



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lt. Governor

## NEW MEXICO ENVIRONMENT DEPARTMENT

Harold Runnels Building  
1190 South St. Francis Drive (87505)  
P.O. Box 5469, Santa Fe, NM 87502-5469  
Phone (505) 827-0187 Fax (505) 827-0160  
[www.env.nm.gov](http://www.env.nm.gov)



RYAN FLYNN  
Cabinet Secretary  
BUTCH TONGATE  
Deputy Secretary

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

January 21, 2016

Mr. Jose Terrones  
Project Manager  
Anthony Water and Sanitation District  
P.O. Box 1751  
Anthony, NM 88021

**RE: Minor-Municipal; SIC 4952; NPDES Compliance Evaluation Inspection; Anthony Water and Sanitation District Waste Water Treatment Plant; NM0029629; November 17, 2015**

Dear Mr. Terrones:

Enclosed please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas, for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are listed in the report. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address above) in writing within 30 days from the date of this letter. Further, notify in writing both USEPA (Racquel Douglas, USEPA (6EN), 1445 Ross Ave., Dallas, Texas, 75202), NMED regarding modifications and compliance schedules.

If you have any questions about this inspection report, please contact Barbara Cooney at 505-827-0212 or at [barbara.cooney@state.nm.us](mailto:barbara.cooney@state.nm.us).

Sincerely,  
*/s/ Bruce J. Yurdin*

Bruce J. Yurdin  
Program Manager  
Point Source Regulation Section  
Surface Water Quality Bureau

Cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Racquel Douglas, USEPA (6EN-WM) by e-mail  
Darlene Whitten-Hill, USEPA (6EN) by e-mail  
NMED District III, by e-mail



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

### NPDES Compliance Inspection Report

#### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1   N   2   5   3   N   M   0   0   2   9   6   2   9   11   12   1   5   1   1   1   7   17   18   C   19   S   20   1					
Remarks					
M   I   N   O   R   M   U   N   I   C   I   P   A   L   A   N   T   H   O   N   Y   W   W   T   P					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67       1   69	70   2	71   N   72   N   73       74   75   M   I   N   O   R   80			

#### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) ANTHONY WATER & SANITATION DISTRICT, WASTEWATER TREATMENT FACILITY, 1470 NORTH 4TH, ANTHONY, NEW MEXICO 88021.  From Las Cruces take I-10 towards Texas Boarder, Take EXIT 162, NM404 (East O'Hara Road) → Turn Right - road curves around - travel approx. 1/3 to 1/2 mile to stop light at NM460, Turn Left (South) → 4 <sup>th</sup> street is a small service road that parallels NM460. It is easiest to make a U-Turn at the intersection of East O'Hara Road and NM460 then take a quick right onto 4 <sup>th</sup> Street. - The WWTP is approx. 1/2 Block down on the Left. The golf course is just past the WWTP. DONA ANA COUNTY	Entry Time /Date 11:20 a.m. / November 17, 2015	Permit Effective Date January 1, 2013
	Exit Time/Date 2:45 p.m. / November 17, 2015	Permit Expiration Date December 31, 2017
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Randy Sanchez, Operator 575-618-7504 Ryan Lunderville, Head Operator 575-882-3922	Other Facility Data SIC 4952 GPS location at the outfall to the Rio Grande Latitude: North 32° 01' 23" Longitude: West 106° 38' 54"	
Name, Address of Responsible Official/Title/Phone and Fax Number Jose Terrones, Project Manager 575-882-3922 Anthony Water and Sanitation District P.O. Box 1751 Anthony, NM 88021	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

#### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	M	Flow Measurement	U	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	U	Self-Monitoring Program	U	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
M	Effluent/Receiving Waters	M	Laboratory	N	Storm Water	N	Other:

#### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

PLEASE SEE THE ATTACHED REPORT WITH FURTHER EXPLANATIONS

Name(s) and Signature(s) of Inspector(s) /S/ BARBARA COONEY	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0212 / 505-827-0160	Date January 21, 2016
Signature of Management QA Reviewer /S/ JENNIFER FOOTE	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-0187 / 505-827-0160	Date January 21, 2016

## SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

 S  M  U  NA (FURTHER EXPLANATION ATTACHED No)

DETAILS:

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE

 Y  N  NA

2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES

 Y  N  NA

3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT

 Y  N  NA

4. ALL DISCHARGES ARE PERMITTED

 Y  N  NA

## SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.

 S  M  U  NA (FURTHER EXPLANATION ATTACHED Yes)

DETAILS:

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.

 Y  N  NA

2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.

 S  M  U  NA

a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING

 Y  N  NA

b) NAME OF INDIVIDUAL PERFORMING SAMPLING

 Y  N  NA

c) ANALYTICAL METHODS AND TECHNIQUES.

 Y  N  NA

d) RESULTS OF ANALYSES AND CALIBRATIONS.

 Y  N  NA

e) DATES AND TIMES OF ANALYSES.

 Y  N  NA

f) NAME OF PERSON(S) PERFORMING ANALYSES.

 Y  N  NA

3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.

 S  M  U  NA

4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.

 S  M  U  NA

5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.

Not Verifiable

 Y  N  NA

## SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.

 S  M  U  NA (FURTHER EXPLANATION ATTACHED Yes)

DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.

 S  M  U  NA

2. TREATMENT UNITS PROPERLY MAINTAINED.

 S  M  U  NA

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.

 S  M  U  NA

4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.

 S  M  U  NA

5. ALL NEEDED TREATMENT UNITS IN SERVICE.

 S  M  U  NA

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.

 S  M  U  NA

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.

 S  M  U  NA

8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.

 Y  N  NA

STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.

 Y  N  NA

PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.

 Y  N  NA

## SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?  
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?  
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?
- Y  N  NA  
 Y  N  NA  
 Y  N  NA
10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?  
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?
- Y  N  NA  
 Y  N  NA

## SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED Yes.)  
 DETAILS: Missing Records

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.  Y  N  NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.  Y  N  NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.  Y  N  NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.  Y  N  NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.  Y  N  NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE  Y  N  NA
- a) SAMPLES REFRIGERATED DURING COMPOSITING.  Y  N  NA
- b) PROPER PRESERVATION TECHNIQUES USED.  Y  N  NA
- c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.  Y  N  NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?  Y  N  NA

## SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED Yes.)  
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  
 TYPE OF DEVICE  Y  N  NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.  Y  N  NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.  Y  N  NA
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION Sept. 2014)  
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES.  Y  N  NA  
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.  Y  N  NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.  Y  N  NA
6. HEAD MEASURED AT PROPER LOCATION.  Y  N  NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.  Y  N  NA

## SECTION F - LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED Yes.)  
 DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)  Y  N  NA

**SECTION F - LABORATORY (CONT'D)**2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED  Y  N  NA3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.  S  M  U  NA4. QUALITY CONTROL PROCEDURES ADEQUATE.  S  M  U  NA5. DUPLICATE SAMPLES ARE ANALYZED. 10 % OF THE TIME.  Y  N  NA6. SPIKED SAMPLES ARE ANALYZED. 10 % OF THE TIME.  Y  N  NA7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME Water Technology Associates (Doug Roby)

Bio Aquatics

3501 Mesilla Hills Dr.

Carrollton, TX

LAB ADDRESS Las Cruces, NM 88005

PARAMETERS PERFORMED BOD, TSS, E coli

Whole Effluent Toxicity

**SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS.**  S  M  U  NA (FURTHER EXPLANATION ATTACHED Yes.)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
	No	No	No	No	No	Slight brown-clear	

RECEIVING WATER OBSERVATIONS See The Further Explanations Section of This Report

**SECTION H - SLUDGE DISPOSAL**SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED Yes.)  
DETAILS:1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY.  S  M  U  NA2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503.  S  M  U  NA3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: Surface Disposal at landfill (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)**SECTION I - SAMPLING INSPECTION PROCEDURES** (FURTHER EXPLANATION ATTACHED No.)1. SAMPLES OBTAINED THIS INSPECTION.  Y  N  NA

2. TYPE OF SAMPLE OBTAINED

GRAB \_\_\_\_\_ COMPOSITE SAMPLE \_\_\_ METHOD \_\_\_\_\_ FREQUENCY \_\_\_\_\_

3. SAMPLES PRESERVED.  Y  N  NA4. FLOW PROPORTIONED SAMPLES OBTAINED.  Y  N  NA5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.  Y  N  NA6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.  Y  N  NA7. SAMPLE SPLIT WITH PERMITTEE.  Y  N  NA8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.  Y  N  NA9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.  Y  N  NA

### **Introduction**

On November 17, 2015 a Compliance Evaluation Inspection (CEI) was conducted at the Anthony Water and Sanitation District Wastewater Treatment Plant (WWTP) by Barbara Cooney of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). The inspection was conducted by NMED for the US Environmental Protection Agency (USEPA), Region VI, under the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the Federal Clean Water Act. These inspections are conducted under contract with the USEPA and are used by USEPA to evaluate compliance with the NPDES permit program. This inspection report is based on information supplied by the Anthony Water and Sanitation District representatives (the permittee), observations made by the NMED inspectors, reports and records kept by the permittee and/or NMED.

The Anthony Water and Sanitation District WWTP is classified as a minor municipal discharger under the Federal Clean Water Act (CWA), section 402 NPDES permit program, and is assigned NPDES permit number NM0029629. The Standard Industrial Classification Code (SIC) is 4952. The facility is permitted for a design flow of 0.99 Million Gallons per Day (MGD). The discharge for the WWTP enters the Rio Grande in Water Quality Segment 20.6.4.101 NMAC. The Designated Uses for this segment of the river are: irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat, and primary contact.

### **Inspection Details**

The inspector arrived at the Anthony Water and Sanitation District WWTP at 11:20 hours and met with Mr. Randy Sanchez, Operator. The inspector showed her credentials and explained the purpose of the inspection. Mr. Sanchez accompanied the inspector on a tour of the facility. A records review and laboratory inspection were conducted following the plant tour. Additional records were requested by the inspector and provided by the facility representatives, for further review by the inspector. The inspector left the facility at 15:45 hours. An exit interview was held by phone on November 20, 2015 at 10:45 hours between the inspector and Mr. Charles Trujillo, Utilities Director, Mr. Ryan Lunderville, Plant Manager and Mr. Randy Sanchez. Preliminary findings were discussed during the exit interview.

### **Treatment Scheme**

The Anthony WWTP has a hydraulic capacity of 0.99 MGD. The average daily flow entering this facility is approximately 0.650 MGD. Operations at this facility began January 28, 1996.

Flow from the City of Anthony enters the WWTP from twelve lift stations. Approximately 2000 sewer hookups from residences, businesses, schools and municipal government offices are within a 3 square mile service area. An instantaneous flow measuring device is located on the influent pipe as it enters the treatment works. This unit provides both instantaneous flow and a totalizer which is read daily at 0800 hours. A wheel graph read out is located in the control building. These records are kept on site. The headworks consists of a manual bar screen. Screenings are placed in a container for shipment to a sanitary landfill after drying.

Flow from the headworks enters the first of four aeration basins run in series. Between each aeration basin is an anoxic basin for nitrogen removal. Flow passes through all seven basins during the treatment phase. The DO levels that should be maintained in the aeration basins are above 0.2 to 1.5 mg/L. It was unclear if the operators were testing DO or not. The operator did not know what the Mixed Liquor Suspended Solids (MLSS) levels were. DO in the anoxic basins should be near 0 mg/l. A mixer in the anoxic basins keeps the solids suspended and the contents moving, but provides no oxygenation. Air for the aeration basins is provided through in-line diffusers on the bottom of the aeration basins. Blowers provide the air for the aeration system. There are two blowers on site which are alternated, to allow one to rest and to reduce wear.

Flow from the final aeration basin enters the circular, centrally located secondary clarifier via an 18 inch line. Solids are allowed to settle in this unit and returned to the aeration basins through a return activated sludge (RAS) line. When MLSS levels get relatively high, sludge should be wasted to an aerobic digester. The clarifier is skirted to prevent floating material from exiting the unit. The weirs on this unit were not even and short circuiting did appear to be taking place. A sweep arm, scum removal system is employed to clear the foam off the surface and deposit it into a scum box. The scum box contents are drained to the digester. Scrappers are used on the bottom of this unit to move sludge to the center of the clarifier. A sludge blanket of approximately two to four feet is maintained in this unit. Effluent from the clarifier flows by gravity in the weir gallery to a 16-inch clarifier effluent line. The contents of this unit were clear.

Flow from the secondary clarifier travels by gravity to the disinfection unit. Disinfection is accomplished through two banks of ultra violet (UV) lamps in the effluent channel. An opacity meter at this unit determines when the lamps need to be cleaned.

After disinfection, effluent flow measurements are taken through a 12-inch Parshall flume with a secondary sonic sensor device. The readings in gallons per minute can be recorded as total daily flow as well. Flow then leaves the WWTP by gravity and enters the Rio Grande through an approximately two mile long discharge pipe.

### **Solids**

Waste activated sludge (WAS) is pumped from the secondary clarifier to an aerobic digestion unit. The contents are aerated and mixed prior to going to the belt filter press. Dried sludge is then removed and transferred to a sanitary landfill in Sunland Park for final disposal. Sludge drying beds on site are used as a backup drying system.

### **Further Explanations**

Note: The sections are arranged according to the format of USEPA Form 3560-3 and checklist, attached, rather than being ranked in order of importance.

### **Permit**

Overall Rating For Permit Verification (Satisfactory)

### **Record Keeping and Reporting**

Overall Rating For Record Keeping and Reporting (Unsatisfactory)

### **Permit Requirements For Record Keeping and Reporting**

The permit requires, in III. C. Monitoring and Records

#### *1. Inspection and Entry*

*The permittee shall allow the Director, or an authorized representative, upon the presentation of credentials and other documents as may be required by the law to:*

- a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;*
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;*
- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices or operations regulated or required under this permit; and*
- d. Sample or monitor at reasonable times, for the purpose of assuring permit compliance or as otherwise authorized by the Act, any substances or parameters at any location.*

### **Findings For Recordkeeping and Reporting**

Records were reviewed for the months of July, August and September 2015. Concerns found during the records review are noted below and under the sections for Self-Monitoring and Laboratory.

1. Discharge Monitoring Reports (DMRs) have not been submitted to the State of New Mexico nor to EPA for the entire year of 2015. This is the primary reason for the Unsatisfactory rating.
2. At the time of the inspection, the operator could not locate and provide all the records requested. The inspector requested the operator work with the facility manager who was in classes the day of the inspection, to locate and organize documents and to send records via email within the following two weeks after the inspection.
3. There was no indication that process control testing is being done for Dissolved Oxygen (DO) and Mixed Liquor Suspended Solids (MLSS).
4. The EPA is encouraging permittees to transition from submitting DMRs as paper copies to the NetDMR system. Information on the NetDMR training can be found at:  
<http://epa.gov/netdmr/about/training.html>

Additionally, the State conducts classes on a periodic basis, through the Operator Certification Schools. Facility personnel are encouraged to attend these training sessions.

### **Operations And Maintenance**

Overall Rating For Operation and Maintenance (Unsatisfactory)

### **Permit Requirements For Operation And Maintenance**

The permit requires in Part III. B.

#### *3. Proper Operations and Maintenance*

*a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner that which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the condition of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*

*b. The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.*

### **Findings For Operation and Maintenance**

1. Operators have increased solids wasting from the time of the previous inspection. This has had a positive effect on overall plant performance.
2. A mixer in an anoxic basin was out of order. The sludge belt press was out of order at the time of the inspection.
3. A blower was out of order at the time of the inspection.
4. Some uneven flow and short circuiting was observed in the secondary clarifiers. This is likely the result of the units settling into the ground over the years. However the weirs were free of excessive algae build up and were being cleaned regularly.
5. The piping for the air diffusers in the aeration basins was showing signs of rusting and deterioration.
6. There were not any back up parts on site for the blowers or other equipment.
7. The sludge drying bed liners are old and falling apart.

### **Self-Monitoring**

Overall Rating For Self-Monitoring (Marginal)

#### **Permit Requirements For Self Monitoring**

The permit requires in Part III. C. Monitoring and Records.

*2. Representative Sampling*

*Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.*

*3. Retention of Records*

*The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report, or application. The period may be extended by request of the Director at any time.*

#### **Findings For Self Monitoring**

Records were reviewed for the month of July, August and September 2015.

1. Because daily flow records were not provided to the inspector, loading calculations cannot be verified.

2. At the time of the inspection, the operator on site was not able to locate all the records requested. The inspector then requested that quarterly records be sent for the time period listed above. The permittee did send many of the records requested following the inspection.

### **Flow Measurement**

Overall Rating For Flow Measurement (Marginal)

#### **Permit Requirements For Flow Measurements:**

The permit requires in Part III C. 6. FLOW MEASUREMENTS:

*Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed calibrated, and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected, shall be capable of measuring flow with a maximum deviation 10% from true discharge tares throughout the range of expected discharge volumes.*

#### **Findings For Flow Measurements**

1. The calibration record from the contractor Yukon & Associates show it was last checked September 17, 2014. This should be done yearly. In addition Operators should periodically through the year check the Drexelbrook electronic sensor against the Parshall Flume staff gauge.

### **Laboratory**

Overall Rating For Laboratory (Marginal)

#### **Permit Requirements For Laboratory**

The perm requires in Part C. Monitoring and Records. 4. Records Content

*Records of monitoring information shall include:*

- a. The date, exact place, and time of sampling or measurements;*
- b. The individual(s) who performed the sampling or measurement;*
- c. The date(s) and time(s) analyses were performed;*
- d. The individual(s) who performed the analyses;*
- e. The analytical technique or method used; and*
- f. The results of such analyses.*

The permit requires in Part C. Monitoring and Records. 5. Monitoring Procedures

- a. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.*
- b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.*
- c. An adequate analytical quality control program, including the analyses of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.*

#### **Findings For Laboratory**

1. Records of samples taken and analyzed by the contract laboratory included the required information.
2. The onsite laboratory has records for pH sampling and analysis. These records did not have the procedure identified on the bench sheet. The documents should be updated to include that information. The records did include the name of the person performing the sample and analysis, dates and times and the results.
3. The pH meter and buffers were stored and maintained correctly.
4. Duplicate samples were not analyzed for quality control at the onsite laboratory. The contract laboratory did show duplicate samples being analyzed for TSS.
5. The balance for the laboratory was most recently calibrated by a contractor February 10, 2015.

**Effluent And Receiving Water**

Overall Rating For Effluent And Receiving Water (Marginal)

**Permit Requirements For Effluent And Receiving Water**

The permit requires in Part I Table I

EFFLUENT CHARACTERISTICS	DISCHARGE							
	lbs/day, unless noted			mg/L, unless noted (*1)			MONITORING REQUIREMENTS	
POLLUTANT	30-DAY AVG	DAILY MAX	7-DAY AVG	30-DAY AVG	DAILY MAX	7-DAY AVG	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	Report MGD	Report MGD	Report MGD	N/A	N/A	N/A	Daily	Totalizing Meter
Total Suspended Solids	245.2	N/A	367.8	30	N/A	45	Three/Month	3-Hour Composite
Total Suspended Solids, %	≥ 85% (*2)	N/A	N/A	N/A	N/A	N/A	Once/Month	Calculation (*2)
Biochemical Oxygen Demand	245.2	N/A	367.8	30	N/A	45	Three/Month	3-Hour Composite
Biochemical Oxygen Demand	≥ 85% (*2)	N/A	N/A	N/A	N/A	N/A	Once/Month	Calculation (*2)
Total Residual Chlorine	N/A	N/A	N/A	N/A	19 µg/l	N/A	Five/Week	Instantaneous Grab (*3)
<i>E. coli</i> Bacteria	4.30 (*4)	N/A	N/A	126 (*5)	410 (*5)	N/A	Three/Month	Grab

**Findings For Effluent And Receiving Water**

1. Effluent records were not available and not reported via Discharge Monitoring Reports at the time of the inspection. A fully Satisfactory rating cannot be given without complete records. The permittee did provide records after the inspection for the months of July, August and September 2015. The records for that time period did not show effluent exceedences, therefore a rating of “Marginal” rather than “Unsatisfactory” was given.

**SLUDGE HANDLING**

Overall Rating For Sludge Handling (Unsatisfactory)

**Permit Requirements For Sludge Handling**

The permit requires in Part IV. MINOR - SEWAGE SLUDGE REQUIREMENTS ELEMENT 2-SURFACE DISPOSAL

***SECTION I. REQUIREMENTS APPLYING TO ALL SEWAGE SLUDGE SURFACE DISPOSAL***

***A. General Requirements***

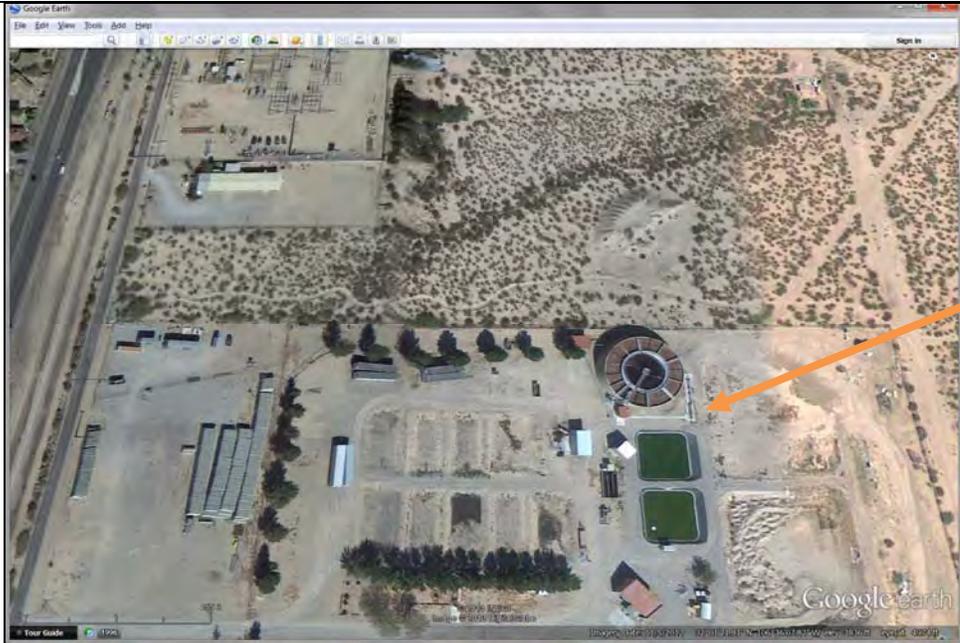
*1. The permittee shall handle and dispose of sewage sludge in accordance with Section 405 of the Clean Water Act and all other applicable Federal regulations to protect public health and the environment from any reasonably anticipated adverse effects due to any toxic pollutants which may be present.*

**Findings For Sludge Handling**

1. DMRs have not been submitted for sludge. Records were not provided for solids testing. This is the reason for the Unsatisfactory rating.
2. Solids coming off the belt press land on an unbermed concrete area. Run off and track out is occurring from this area. Solids were observed on bare ground.
3. The sludge drying beds have liners that are breaking down and could potentially be leaking into groundwater.

**NMED/SWQB  
Official Photograph Log  
Photo # 1**

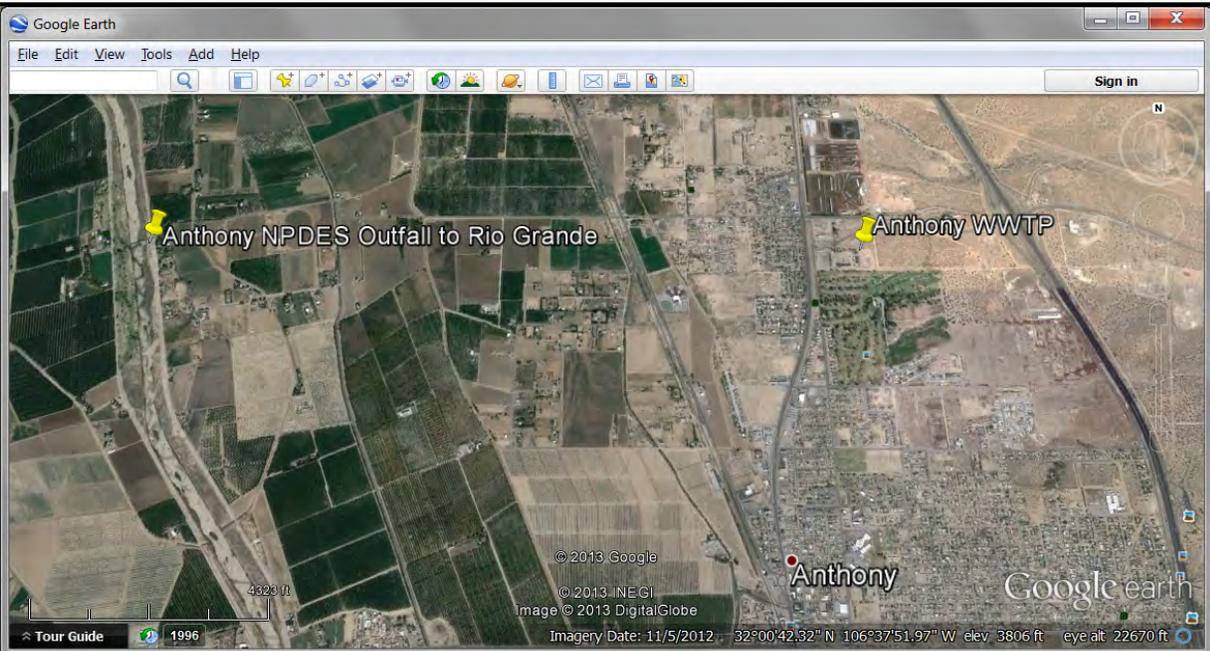
Photographer: B. Cooney	Date: Unknown	Time: Unknown
City/County: Anthony / Dona Ana		State: New Mexico
Location: Anthony WWTP		
Subject: Google Earth Aerial View of Anthony WWTP		



**Sample Location:  
End of UV Treatment**

**NMED/SWQB  
Official Photograph Log  
Photo # 2**

Photographer: : B. Cooney	Date: Unknown	Time: Unkn own
City/County: Anthony / Dona Ana		State: New Mexico
Location: Anthony WWTP		
Subject: Google Earth Aerial View of Anthony WWTP and the Discharge Location at the Rio Grande River aprox. 2 miles away.		



NMED/SWQB  
Official Photograph Log  
Photo #3

Photographer: B. Cooney

Date: November 17, 2015

Time: 13:05 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: A screw pump lifts raw sewage to the above ground treatment units. The entrance works include a manual bar screen seen below. Scraping are put in a hopper and disposed of at the Camino Real Landfill.



NMED/SWQB  
Official Photograph Log  
Photo # 4

Photographer: B. Cooney

Date: November 17, 2015

Time: 13:06 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: The treatments include a donut shaped activated sludge system. The outer chambers work as both aeration basins and anaerobic basins. Below is an aeration basin. The MLSS was not known, it is suggested operators test regularly as part of operation controls. It was apparent there were far fewer solids in the system than the last inspection in 2013 when the treatment plant was observed to be extremely overloaded with solids. This is an improvement in operations for the facility.



NMED/SWQB  
Official Photograph Log  
Photo # 5

Photographer: B. Cooney

Date: November 17, 2015

Time: 13:06 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: An anoxic basin in the settling phase. Foam and solids were observed on the surface. However the solids did not appear to be exceptionally old. There was no indication of spillage or overflow from the basin. There is no mechanism for removal of floating solids in the basin.



NMED/SWQB  
Official Photograph Log  
Photo # 6 & 7

Photographer: B. Cooney

Date: November 17, 2015

Time: 13:11 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: The central part of the treatment "doughnut" is the secondary clarifier. The day of the inspection was a very windy so the effects may have been exaggerated; however, the weirs appeared to not be level throughout the basin. The operator indicated that even on days without wind, decant flow was high over the weirs in some parts of the basin than others. The weirs were generally clean and free of debris. Some amounts of larger solids appear to have been caught. The sludge blanket was 1 to 2 feet in the basin, indicating frequent wasting of solids.



NMED/SWQB  
Official Photograph Log  
Photo # 8

Photographer: B. Cooney

Date: November 17, 2015

Time: 12:56 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: Ultra Violet Disinfection Lights and effluent weirs. At the time of inspection all bulbs were operating. Effluent was clear.



NMED/SWQB  
Official Photograph Log  
Photo # 9

Photographer: B. Cooney

Date: November 17, 2015

Time: 13:38 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: Effluent pipe at the Rio Grande. The treated discharge was clear and free of floating solids. Small fish or minnows were swimming in the outfall water.



NMED/SWQB  
Official Photograph Log  
Photo # 10

Photographer: B. Cooney

Date: November 17, 2015

Time: 13:51 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: Effluent pipe at the river, a gentleman and his grandson watching the water and minnows at the outfall.



NMED/SWQB  
Official Photograph Log  
Photo # 11 & 12

Photographer: B. Cooney

Date: November 17, 2015

Time: 12:49 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: Sludge processing. Belt press and conveyor belt sends solids to a dump truck that hauls solids to the Camino Real Landfill for final disposal. At the time of the inspection the belt press was out of operation while the permittee was waiting for spare parts.



NMED/SWQB  
Official Photograph Log  
Photo # 13

Photographer: B. Cooney

Date: November 17, 2015

Time: 12:49 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: Sludge processing area is not bermed and some dried solids were observed on the ground.



NMED/SWQB  
Official Photograph Log  
Photo # 14

Photographer: B. Cooney

Date: November 17, 2015

Time: 12:40 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: Solids handling, when the belt press is out of operation the lined drying beds hold wasted solids. The facility has a NMED Ground Water Discharge Permit.



NMED/SWQB  
Official Photograph Log  
Photo # 15 & 16

Photographer: B. Cooney

Date: November 17, 2015

Time: 12:35 Hours and 12:55 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: Influent Flow meter, recording daily flows. Drexelbrook Ultrasonic Effluent flow meter .



NMED/SWQB  
Official Photograph Log  
Photo # 17

Photographer: B. Cooney

Date: November 17, 2015

Time: 12:32 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: pH buffers were stored correctly and within the manufactures expiration date. Operators should also write on the bottles the date it was opened.



NMED/SWQB  
Official Photograph Log  
Photo # 18

Photographer: B. Cooney

Date: November 17, 2015

Time: 12:55 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: The activated sludge treatment units are above ground. The ground water table in the area is near the surface, less than 20 feet deep.



NMED/SWQB  
Official Photograph Log  
Photo # 19

Photographer: B. Cooney

Date: November 17, 2015

Time: 12:55 Hours

City/County: Anthony / Dona Ana

State: New Mexico

Location: Anthony WWTP

Subject: The facility has storage lagoons that are not used in the treatment process. The lagoons remain in place. According to operators contain rain water and runoff.

