



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



RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

September 14, 2015

Mr. Scott Berry, City Manager
City of Raton
P.O. Box 910
224 Savage Ave.
Raton, New Mexico 87740

**Re: Raton Water Treatment Plant; Minor Non-Municipal; SIC 4941; NPDES Compliance
Evaluation Inspection; NM0029891; August 26, 2015**

Dear Mr. Berry:

Enclosed please find a copy of the report and check list 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.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised 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 below) in writing within 30 days from the date of this letter. Further you are encouraged to notify in writing both USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Fountain Place
1445 Ross Avenue
Dallas, Texas 75202-2733

Bruce Yurdin
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

Raton Water Treatment Plant

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If you have any questions about this inspection report, please contact Daniel Valenta at (505) 827-2575 or at daniel.valenta@state.nm.us.

Sincerely,

/s/Bruce 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, USEPA (6EN-WM) by e-mail
Brent Larsen, USEPA (6WQ) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
NMED District II, Robert Italiano by e-mail
Dan Campbell, Raton Water General Manager 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 8 9 1 11 12 1 5 0 8 2 6 17 18 C 19 S 20 2					
Remarks					
W A T E R T R E A T M E N T P L A N T					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 4	71 N 72 N 73 74 75 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)	Entry Time /Date 1250/August 26, 2015	Permit Effective Date November 1, 2010
Raton Water Treatment Plant – from I-25, take exit 454 and make a left turn at the stop. Follow road for about 2 miles. Turn left onto N. 1st Street, follow N. 1st Street to plant. Colfax County	Exit Time/Date 1525/August 26, 2015	Permit Expiration Date October 31, 2015
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data	
Dan Campbell/General Manager/575-445-3861warehouse 575-445-8092 filter plant 575-445-9591 Lonny Bacon/Filter Plant Superintendent/505-445-9591, cell 505-445-3861, fax 505-445-1089 Anthony Bustos/Operator/ 575-445-959	GPS: N. 36.918267 W. -104.433844	
Name, Address of Responsible Official/Title/Phone and Fax Number	SIC 4941	
Mr. Scott Berry/City Manager/ P.O. Box 910, 224 Savage Ave., Raton, New Mexico 87740/ 575-445-9551, fax 575-445-3398	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

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

- SEE REPORT AND FURTHER EXPLANATIONS.
- THIS FACILITY HAS NOT DISCHARGED DURING THE TERM OF THIS PERMIT.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
DANIEL VALENTA /s/Daniel Valenta	NMED/SWQB 505-827-2575	9/14/2015
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
SARAH HOLCOMB /s/Sarah Holcomb	NMED/SWQB 505-827-2798	9/14/2015

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED *No.*)

- 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 *No.*)

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. **(No discharges)** 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. Y N NA

SECTION C – OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED (*No.*))

- 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. **(Outside generator brought to site.)** 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. **One treatment basin ongoing repairs.** 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? Y N NA
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? Y N NA
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? Y N NA
10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? Y N NA
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT? Y N NA

SECTION D - SELF-MONITORING

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

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT. **(No Discharges have occurred.)** 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 No)
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. **(Estimate Only)** Y N NA
 TYPE OF DEVICE
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 _____) Y N NA
 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 No)
 DETAILS:

- (No samples taken.)**
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 NA
- 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. S M U NA
- 4. QUALITY CONTROL PROCEDURES ADEQUATE. S M U NA
- 5. DUPLICATE SAMPLES ARE ANALYZED. ___ % OF THE TIME. Y N NA
- 6. SPIKED SAMPLES ARE ANALYZED. ___ % OF THE TIME. Y N NA
- 7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME Seacrest Group American Interplex
 LAB ADDRESS 1341 Cannon St. St. Louisvile, CO 80027-1455 8600 Kanis Rd. Little Rock AR 72204-2322
 PARAMETERS PERFORMED WET _____ Nitrogen - Phosphorus

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. S M U NA (FURTHER EXPLANATION ATTACHED No.)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	No Discharge						

RECEIVING WATER OBSERVATIONS:

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No.)
 DETAILS:

- 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. S M U NA
- 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. S M U NA
- 3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES **(No Samples Taken)** (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 NA
- 4. FLOW PROPORTIONED SAMPLES OBTAINED. Y N NA
- 5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. Y N NA
- 6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. Y N NA
- 7. SAMPLE SPLIT WITH PERMITTEE. Y N NA
- 8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. Y N NA
- 9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. Y N NA

Raton Water Treatment Plant
NPDES Permit NM0029891
August 26, 2015

Introduction

On August 26, 2015 Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Raton Water Treatment Plant (WTP). The Raton WTP has a design flow capacity of 0.08 MGD (million gallons per day) and is classified as a minor industrial discharger under the Federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0029891. This permit regulates the WTP discharge to an ephemeral arroyo, thence to Raton Creek, thence to Chicorica Creek, thence to the Canadian River in segment 20.6.4.305 of the Canadian River Basin according to the *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 NMAC*. This segment includes the designated uses of irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat and primary contact.

The NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspector, and records and reports kept by the permittee and/or NMED.

Upon arrival at the WTP at 1250 hours on August 26, 2015, the inspector conducted an entrance interview with Mr. Lonnie Bacon, Filter Plant Superintendent and Mr. Anthony Bustos, Plant Operator, where he presented credentials and explained the purpose of the inspection. Mr. Dan Campbell, General Manager, arrived shortly afterwards. Mr. Bacon and Mr. Campbell conducted a tour of the facility, including the onsite lab and files kept in relation to the NPDES permit. An exit interview was conducted with Messrs. Campbell, Bacon, and Wood at approximately 1522 hours on August 26, 2015 where the inspector presented the preliminary findings of the inspection.

Treatment Scheme:

The Raton Water Treatment Plant is a municipal drinking water treatment facility. The intake water is received from Lake Maloya and/or the Cimarron River. The facility serves about 6882 people in Raton (according to 2010 Census information). Due to a downturn in the economy the area population has decreased. Past water needs of 1800 GPM has decreased to 900 GPM according to the General Manager.

The plant operates under Standard Industrial Classification Code (SIC) 4941. This facility has the ability to treat up to 4 MGD, with the backwash and filter-to-waste water flows generating a flow of approximately 0.08 MGD. The raw water is treated with coagulation, flocculation, sedimentation, filtration and disinfection. Raw water is fed to a large holding tank. The water is then pumped into the facility where aluminum chloride and a polymer are injected. It flows through two large basins where the floc is allowed to grow in size. The water is then fed into rectangular clarifiers where the floc settles out. After clarification, the water flows into filtration units and then is sent out for distribution. The facility has set a goal of reusing as much of the water as possible in the treatment process. Therefore, filter backwash water and filter-to-waste water are discharged to a holding tank for reuse. The accumulated solids are pumped to a drying basin and removed from the site.

Raton Water Treatment Plant
NPDES Permit NM0029891
August 26, 2015

During the treatment process if needed water can be diverted into a holding pond below the plant. Water from this pond can be pumped back up to the holding tanks after the waste has settled. If the pond were to overflow it would breach on the west side. This is where the discharge flow would be sampled and flow rates estimated. See attached photos. The slopes of the pond have been enforced with rip rap to prevent down cutting of the banks and a total collapse of the retention bank.

Further Explanations:

Section D – Self-Monitoring - overall rating of “Marginal”

Permit Requirements: Per Page 3 of Part 1A

PART I – REQUIREMENTS FOR NPDES PERMITS

SECTION A. LIMITATIONS AND MONITORING REQUIREMENTS

1. Effluent Limits – 0.08 MGD Design Flow

During the period beginning the effective date of the permit and lasting through the expiration date of this permit, the permittee is authorized to discharge backwash and filter-to-waste water from Outfall 001. Such discharges shall be limited and monitored by the permittee as specified below:

- | | |
|-----------------------------|------------------------------|
| <i>1. Total Gross Alpha</i> | <i>Report 30 Day Average</i> |
| | <i>Report Daily Max</i> |
| <i>2. Tritium</i> | <i>Report 30 Day Average</i> |
| | <i>Report Daily Max</i> |

Finding: The permit requires sampling for Total Gross Alpha and Tritium if discharge were to occur, see above. No sample collection procedures have been established to obtain the required samples. It was unknown what type of container would be needed and holding time of sample to conform to 40 CFR 136.3. A standard operating procedure (SOP) needs to be established beforehand in order to be ready to sample if ever a discharge event occurred.

**NMED/SWQB
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: 8/26/2015	Time: 1441 hours
City/County: Raton/Colfax County		
Location: Raton Water Treatment Plant, facing southwest.		
Subject: Back flush settling basins, note terrain. Facility is located above the city.		



**NMED/SWQB
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 8/26/2015	Time: 1442 hours
City/County: Raton/Colfax County		
Location: Raton Water Treatment Plant, looking southwest.		
Subject: Drying bed when solids build up in settling basins.		



**NMED/SWQB
Official Photograph Log**

Photo # 3

Photographer: Daniel Valenta	Date: 8/26/2015	Time: 1446 hours
City/County: Raton/Colfax County		
Location: Raton Water Treatment Plant, looking northwest.		
Subject: Pond below facility. Arrow points to discharge pipe from the plant to the pond if needed.		

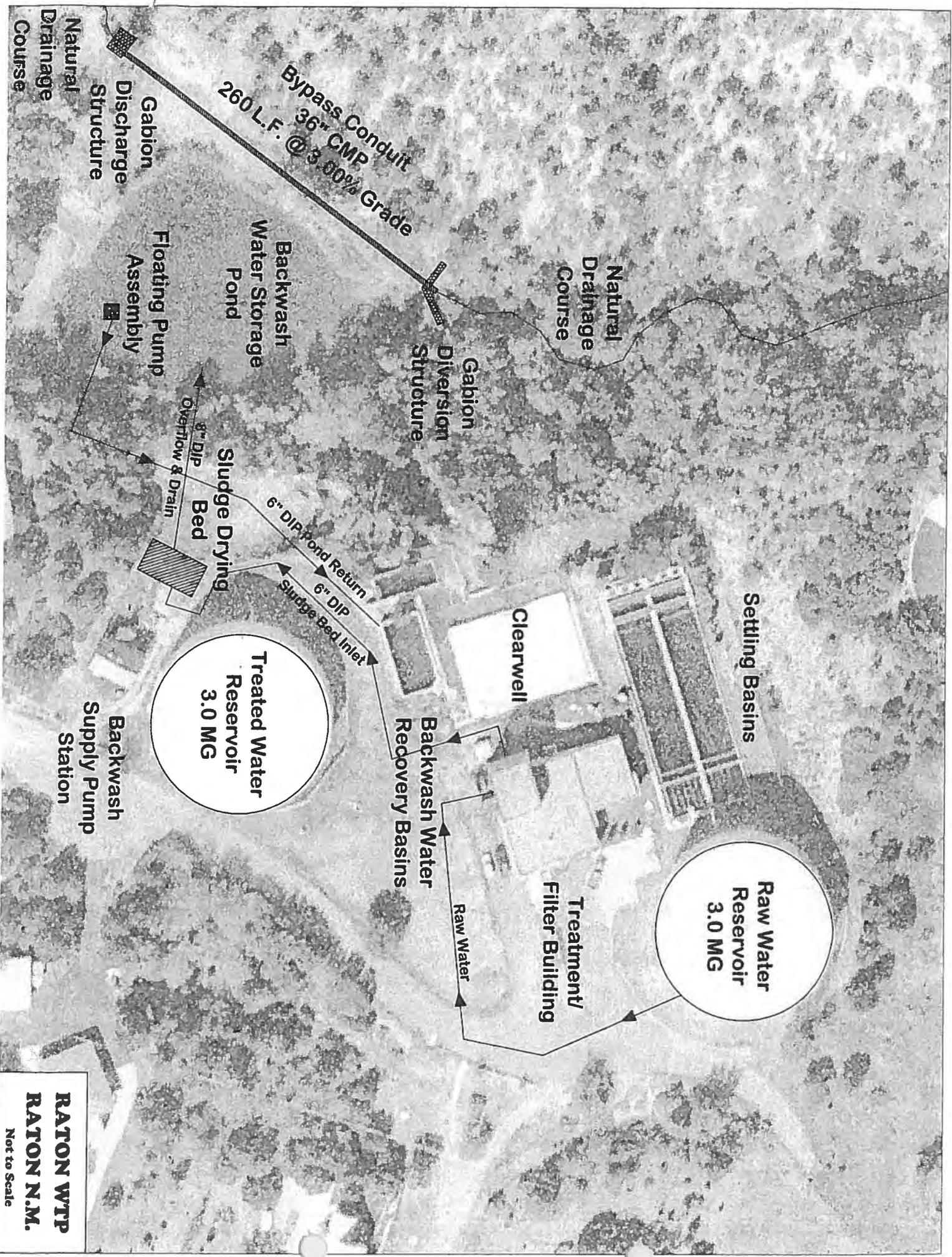


**NMED/SWQB
Official Photograph Log**

Photo # 4

Photographer: Daniel Valenta	Date: 8/26/2015	Time: 1447 hours
City/County: Raton/Colfax County		
Location: Raton Water Treatment Plant, looking north.		
Subject: Pond spillway below facility. Discharge would occur here if pond overflowed.		





RATON WTP
RATON N.M.
 Not to Scale