



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant 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.nmenv.state.nm.us



RYAN FLYNN
Cabinet Secretary

BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

May 18, 2015

Mr. Gilbert G. Mesa PE
Executive Director
CRRUA
Santa Teresa /Sunland Park North
P.O. Box 429
Sunland Park, New Mexico 88063

Re: Minor Municipal; SIC 4952; Compliance Evaluation Inspection; CRRUA Santa Teresa Wastewater Treatment Plant; NPDES Permit No. NM0030201; February 25, 2015

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 the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
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

CRRUA Santa Teresa
May 18, 2015
Page 2

If you have any questions about this inspection report, please contact Barbara Cooney at (505) 827-0212 or at 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
Raquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, 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 3 0 2 0 1 11 12 1 5 0 2 2 5 17 18 1 19 S 20 1					
Remarks					
M I N O R M U N I C I P A L S A N T A T E R E S A					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 1 69	70 1	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) Camino Real Regulation Utility Authority (CRRUA) – Sunland Park-Santa Teresa Wastewater Treatment Plant McNutt Road From Las Cruces take 1-25 South, Merge onto 1.1- East, Take exit13, Make a U-turn onto NM273 towards Sunland Park. The facility entrance is next to Rinker Concrete @ 5540 McNutt Road. Dona Ana County	Entry Time /Date 11:15 Hours 2-25-2015	Permit Effective Date 3/1/2009
	Exit Time/Date 16:50 Hours 2-25-2015	Permit Expiration Date Terminated 1/23/2014
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Carlos Arellano, Waste Water Operator 575-647-7142	Other Facility Data SIC 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Gilbert G. Mesa, Executive Director Camino Real Regional Utility Authority (CRRUA) 4950 McNutt Rd P.O. Box 429 Sunland Park, NM 8806	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Coordinates at the front gate of facility in decimal degrees: Latitude: 31.855056 Longitude: -106.631832

Section C: Areas Evaluated During Inspection

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

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

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

See Further Explanations Section For Details.

Name(s) and Signature(s) of Inspector(s) /S/ Barbara Cooney	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0212 / 505-827-0160	Date 5/21/2015
Signature of Management QA Reviewer /S/ Shelly Lemmon	Agency/Office/Phone and Fax Numbers 505-827-0187 / 505-827-0160	Date 5/21/2015

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U NA (FURTHER EXPLANATION ATTACHED Yes)

DETAILS: Permit Discontinued xxxx date – however permittee stated they believe the permit is still active and they have constructed a new outfall to the Rio Grande. When the location and design information was requested by the inspector, the permittee did not provide documentation.

- 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)

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. 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? This is UNKOWN Though evidence of overflows on the ground are observed

Y N NA
 Y N NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS.
 DETAILS:

S M U NA (FURTHER EXPLANATION ATTACHED Yes.)

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.
 DETAILS:

S M U NA (FURTHER EXPLANATION ATTACHED NO.)

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 _____)
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES.
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.

Y N NA
 Y N NA
 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.
 DETAILS:

S M U NA (FURTHER EXPLANATION ATTACHED _____)

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 Dona Ana County South Central Wastewater Treatment Plant

LAB ADDRESS

PARAMETERS PERFORMED

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
001	No	UK	Yes	No	Yes	Grey	Effluent goes to Sunland Park WWTP

RECEIVING WATER OBSERVATIONS

The effluent is sent to the Sunland Park WWTP for further processing. However facility representatives stated that an effluent pipe was funded and constructed to the Rio Grande River, however no records of the engineering plans and pipe location were provided to the inspector even after multiple requests.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED YES).

DETAILS: Solids overflowed from basins and heavy solids are being sent to the Sunland Park WWTP

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 (FURTHER EXPLANATION ATTACHED).

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

Introduction

On February 25, 2015 a Compliance Evaluation Inspection (CEI) was conducted at the Camino Real Regional Utility Authority (CRRUA) Santa Teresa Wastewater Treatment Plant (WWTP), also known as the Sunland Park North plant, 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 CRRUA representatives (the permittee), observations made by the NMED inspector, reports and records kept by the permittee and/or NMED.

The CRRUA Santa Teresa Wastewater Treatment Plant (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 NM0030201. The permit was discontinued by EPA at the request of CRRUA January 23, 2014. The Standard Industrial Classification Code (SIC) is 4952. The facility is not permitted for discharge to surface waters. The facility is used as pretreatment processing plant for the City of Sunland Park WWTP NM0029483 permitted for a design flow of 2.0 Million Gallons per Day (MGD). Effluent is sent to the City of Sunland Park WWTP. The discharge for the City of Sunland Park WWTP enters the Rio Grande in Water Quality Segment 20.6.4.101 NMAC at Latitude N 31.79866, Longitude W 106.55733. 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 CRRUA Sunland Park WWTP at 11:00 hours and met with Mr. Carlos Arellano, Lead Plant Operator. Mr. Kurt Moffat – CRRUA Manager and Mr. Ernesto Carranza – Supervising Operator, were not available the day of the inspection. Mr. Moffat has since retired. The inspector showed her credentials and explained the purpose of the inspection. Mr. Arellano accompanied the inspector on a tour of the Santa Teresa facility, the extended area of the collection system and a follow up tour of the Sunland Park WWTP NPDES permit number NM0029483. A records review was conducted following the plant tour. Additional records were requested by the inspector. Some of the records, though not all requested, were provided. An exit interview was held at the CRRUA offices following the inspection with Mr. Arellano, Mr. Eric Lopez, contract Wastewater Specialist, Ms. Sue Padilla, Assistant Director CRRUA, and Mr. Gilbert Mesa, Executive Director CRRUA. The inspector left all facilities at 16:50 hours.

Treatment Scheme

The wastewater collection system for the Santa Teresa area includes housing developments, an airport and an industrial park. Operators did not have information on the exact mileage and distance for the collection system, nor the number of hookup and contributors. Wastewater is carried through a combination of 8 lift stations and gravity flow to the plant. Flow enters through a manual bar screen.

Influent flow is not measured. Raw wastewater is split between two aerated ponds. The ponds have one working floating aerator in each, and are heavily loaded with solids and foam. A second aerator that is not in operation is present in the west pond. The east pond is equipped with one though there is enough surface area for a second aerator. Flow from the two ponds is combined and sent to a secondary clarifier, then to a final pond originally designed for disinfection with chlorine, though no chlorination was being done at the time of the inspection. From the final pond, flow is sent to the View Point Lift Station adjacent to the WWTP, also known as the Santa Teresa Lift Station, and then flows by gravity to the City of Sunland Park WWTP. Another discharge line from the Santa Teresa plant to the Rio Grande was installed according to facility representatives. However, operators did not know where the effluent line ties into the treatment plant. The inspector requested information about the site designs, however that information was not provided.

Solids

Solids wasted from the secondary clarifier are concentrated in a central treatment unit; a small package plant that used to be two chambers of an aeration basin, but instead is now being used as a modified aerobic solids digester. A belt press on site and was not in operation at the time of the inspection. There are no sludge drying beds on site. Visual observations indicated that every treatment unit at the facility was extremely overloaded with solids. Operational sampling for process control is not done at this facility so exact numbers and concentrations of solids is not known.

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 (Unsatisfactory)

Requirements for Permit

The NPDES permit was effective March 1, 2009 for discharge to the Rio Grande in Water Quality segment 20.6.4.101. The permit was discontinued by EPA on January 23, 2014 based on a request by the permittee (See attached letter from EPA).

Findings for Permit Requirements

The permit was discontinued by EPA on January 23, 2014 based on a request by the permittee. Since that time the facility has served as a pretreatment plant for the City of Sunland Park WWTP. However in the exit interview, facility representatives stated that they believed the permit is still in place and that an effluent pipe has been funded and constructed to the Rio Grande.

The facility is currently not permitted to discharge to any surface waters. If the permittee intends to resume discharges a permit application must be submitted to EPA and copied to the State. Permit applications may be found at the EPA website:

http://cfpub.epa.gov/npdes/doctype.cfm?sort=name&program_id=45&document_type_id=8

Record Keeping and Reporting

Overall Rating For Record Keeping and Reporting (NA)

Findings For Records and Reporting

Discharges are monitored through the CRRUA, City of Sunland Park WWTP NM0029483 and records shall be evaluated for that facility on a separate inspection.

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 conditions 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

Santa Teresa:

1. Overloaded with solids – aeration basins
2. Evidence of over flows to the ground
3. No influent flow monitoring
4. No effluent flow monitoring
5. Appears to be hydrologically overloaded. With no flow data, it is difficult to determine actual volumes entering and exiting the facility.

6. The aerated ponds have enough surface area for two aerators each. One aerator is in operation in each pond. The east pond only has one aerator. The west pond has two aerators but only one in operation.
7. Secondary clarifier is overloaded with solids.
8. Collection System extends to an industrial area with numerous Significant Industrial Users and no monitoring is being conducted on the waste entering the system, nor the impact it may be having on the plant operations.
9. View Point Lift Station following the WWTP has portable pumps on site, evidence of sewage spills, and oil and gas spills are present at three or more different locations on the ground. Spills have not been cleaned up, instead one area of spillage was covered partially with gravel.
10. Because this facility does discharge to the Sunland Park WWTP NM0029483, the following information is being included in this report:

A reconnaissance walk through of the Sunland Park WWTP showed that many of the unsatisfactory conditions found at the WWTP have not been corrected. In addition to the finding of the November 2014 CEI, an additional problem was noted by the International Boundary and Water Commission (IWBC) in a complaint on March 11, 2015 date (see attached photo). Untreated waste, foam and turbidity was observed and photographed entering the Rio Grande.

The permittee provided photos of the outfall the week following the incident reported by IWBC (see attached photos).

Those findings from the November 2014 CEI include:

1. *Headworks Mechanical bar screen – out of operation.*
2. *Headworks Grit Removal system – out of operation.*
3. *Aeration Basins heavily overloaded with foam and solids. The basins have evidence of over flows including over the outside of the entire basins system (see attached photos).*
4. *Sanitary Sewer Overflows & Collection system – sewer overflows at the man hole near Santa Teresa, called the Dias Lago spill from January 30, 2014 through February 6, 2014 (see attached photos).*
5. *Collection system – lift stations – inadequate alarm systems. No back up power, evidence of past overflows based on debris seen around the lift station. Three lift stations were visited as part of the inspection, the Racetrack liftstation, the Santa Teresa lift station and the Dias Lago lift station (see attached photos).*

6. *Solids Belt press out of operation. The belt has rips and tears (see attached photos). [The belt press has been repaired and is operational. Increased solids removal was occurring at the time of the walk though.]*
7. *Ultraviolet Disinfection not functioning at full operation. Some of the light banks were off line.*
8. *Chlorine dosing is being done with a barrell turned on it's side at the front end of the UV basin. This is dangerous and no containment is present in the event of a spill (see attached photos).*
9. *No Dechlorination.*
10. *Inadequate operational staff. The facility has gone through numerous staff changes at every level in the last few years and there have been periods of management by untrained personnel and staff lacking in experience during the time since the last NMED inspection in August 2013. The conditions at the treatment plant have deteriorated significantly since that time. The Level 4 Wastewater Operator, is also acting as lead operator for other facilities through CRRUA, as well as the signatory for CRRUA. According to facility representatives the Level 4 Operator is rarely on site and rarely directly involved in operations at the Sunland Park WWTP. However, he does fill out the Discharge Monitoring Reports (DMRs). The lead operator who oversaw plant operations for the last year is no longer employed by the permittee. The facility has numerous equipment failures and shows overall decline in general maintenance under that management. This facility and the CRRUA organization is understaffed to meet the demands of not only operations and maintenance but general management. More trained staff is needed.*
11. *Debris on the ground outside of the aerated grit chamber and around the grit hopper.*
12. *Overall housekeeping at the WWTP and the lift stations in the collection system showed debris on the ground and declining conditions (see attached photos).*
13. *Lift station from the Santa Teresa WWTP that transports partially processed wastewater to the Sunland Park WWTP was inspected. Raw sewage mixed with oil from the generators was pooling on the ground (see attached photos). There was evidence of overflows from the lift station that extended beyond the fenced in area.*
14. *Final Clarifiers had a small amount of floating solids that indicate older sludge and inadequate wasting of solids (see attached photo). The clarifier weirs were clean and free of algae and collected solids. An operator was cleaning the weirs the day of the inspection*
15. *Evidence of Hydraulic overload – overflows from the aeration basin. Though the plant design is at 2.0 MGD, and flows recorded are less than that at 7 day averages of 1.53 MGD, overflows from the aeration basins indicate both overloading of solids and overloading of total wastewater volume (see attached photos). This facility cannot accept and effectively treat high volumes of wastewater in it's current condition.*

Self-Monitoring

Overall Rating For Self Monitoring (Not Evaluated)

Flow Measurement

Overall Rating For Flow Measurement (Unsatisfactory)

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 rates throughout the range of expected discharge volumes.

Findings For Flow Measurements

Records that were requested were not provided therefore a finding of Unsatisfactory is assigned to this section of the report.

Laboratory

Overall Rating For Laboratory (Not Evaluated)

Effluent And Receiving Water

Overall Rating For Effluent And Receiving Water (Unsatisfactory)

Permit Requirements For Effluent And Receivig Water

The permittee is not allowed to discharge to surface waters since the permit was discontinued. The final discharge is from the Sunland Park WWTP NM0029483.

Findings For Effluent And Receivig Water

Because the final effluent from the Sunland Park Facility was alleged by a complainant, and confirmed by NMED personnel to have foam and turbidity entering the Rio Grande on March 11, 2015 (see attached photos), an Unsatisfactory rating is being applied.

Sludge Handling

Overall Rating For Sludge Handling (Not Evaluated)

Pretreatment

Overall Rating For Pretreatment (Unsatisfactory)

Permit Requierments for Pretreatment

The permit requires in Part II.D. Contributing Industries and Pretreatment Requirements:

1. The following pollutants may not be introduced into the treatment facility:

a. Pollutants which create a fire or explosion hazard in the publicly owned treatment works (POTW), including, but not limited to, wastestreams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.21;

b. Pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.0, unless the works are specifically designed to accommodate such discharges;

c. Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW, resulting in Interference;

d. Any pollutant, including oxygen demanding pollutants (e.g., BOD), released in a discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW;

e. Heat in amounts which will inhibit biological activity in the POTW resulting in Interference but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds 40 degrees Centigrade (104 degrees Fahrenheit) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits;

f. Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;

g. Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems; and

h. Any trucked or hauled pollutants, except at discharge points designated by the POTW.

2. The permittee shall require any indirect discharger to the treatment works to comply with the reporting requirements of Sections 204(b), 307, and 308 of the Act, including any requirements established under 40 CFR Part 403.

3. The permittee shall provide adequate notice of the following:

a. Any new introduction of pollutants into the treatment works from an indirect discharger which would be subject to Sections 301 and 306 of the Act if it were directly discharging those pollutants; and

b. Any substantial change in the volume or character of pollutants being introduced into the treatment works by a source introducing pollutants into the treatment works at the time of issuance of the permit.

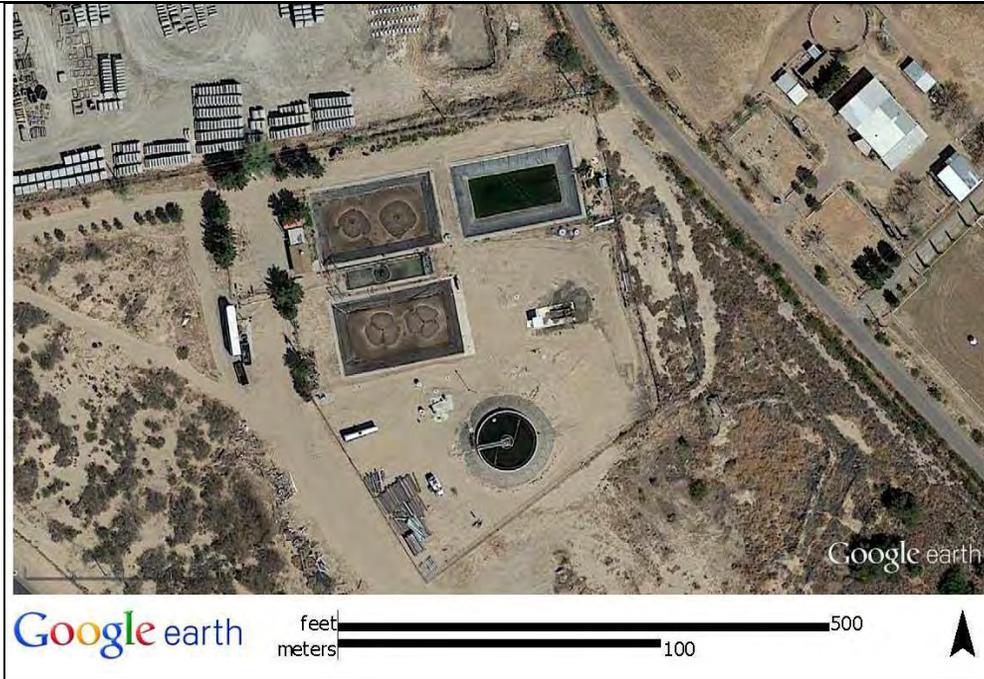
Any notice shall include information on (i) the quality and quantity of effluent to be introduced into the treatment works, and (ii) any anticipated impact of the change on the quality or quantity of effluent to be discharged from the POTW.

Findings For Pretreatment

The facility accepts waste from an airport and an industrial park. There is no monitoring or an industrial user survey that identifies all the contributors. It is suggested that a pretreatment survey be conducted to identify all contributors.

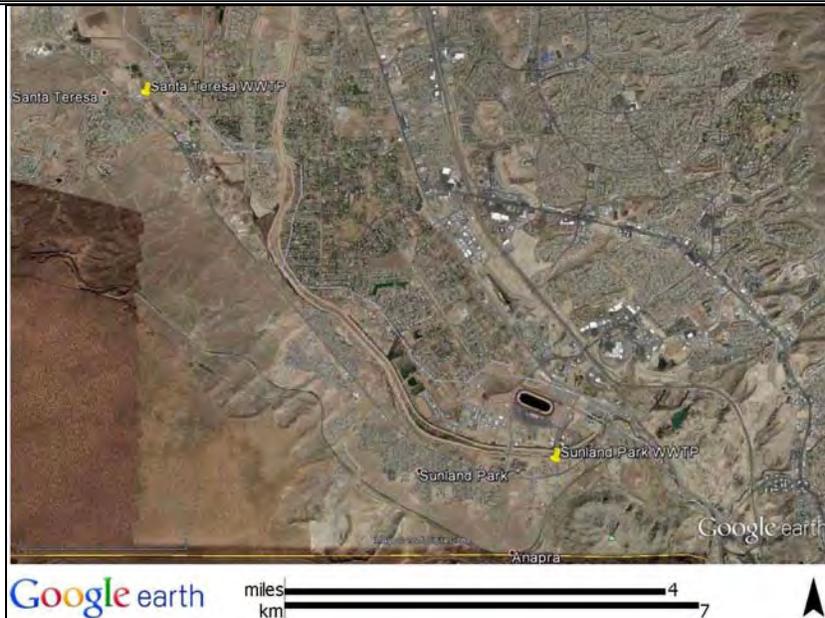
**NMED/SWQB
Official Photograph Log
Photo # 1**

Photographer: Google Earth	Date: 1991	Time: Unknown
City/County: Santa Teresa / Dona Ana		State: New Mexico
Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant		
Subject: Aerial View of the Sunland Park North – Santa Teresa Wastewater Treatment Plant		



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

Photographer: Google Earth	Date: 1991	Time: Unknown
City/County: Santa Teresa - Sunland Park / Dona Ana County		State: New Mexico
Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant		
Subject: Aerial photo show the distance between the Sunland Park North – Santa Teresa WWTP NM0030201 and the Sunland Park WWTP NM0029483 is greater than 7 miles.		



NMED/SWQB
Official Photograph Log
Photo #3

Photographer: B. Cooney

Date: February 25, 2015

Time: 13:30 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant

Subject: Package plant at WWTP influent flow enters the small package plant that is heavily loaded with solids, and only one aerators working. There is evidence of overflows from the basin is seen in the debris on the ground. Overgrown vegetation has not been removed. General maintenance is lacking at this facility.



NMED/SWQB
Official Photograph Log
Photo #4

Photographer: B. Cooney

Date: February 25, 2015

Time: 13:38 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant

Subject: From the package plant, flow is split to two aerated ponds. East Pond: one aerator is working, solids are visible throughout the basins, foam is also an indication of solids overloading. Debris visible at the bottom of the photo shows an area of overflow from the aeration basin of the package plant.



NMED/SWQB
Official Photograph Log
Photo # 5

Photographer: B. Cooney

Date: February 25, 2015

Time: 13:21 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant

Subject: West aerated pond flowing the aeration basins. Only one aerator is operational. Note the worn liner. Solids can be seen throughout the basin indicating overloading and inadequate solids removal.



NMED/SWQB
Official Photograph Log
Photo # 6

Photographer: B. Cooney

Date: February 25, 2015

Time: 13:29 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant

Subject: Evidence of overflow from the basins is noted by the debris on the ground.



NMED/SWQB
Official Photograph Log
Photo # 7

Photographer:

Date: February 25, 2015

Time: 13:28 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant

Subject: Another view of evidence from basin overflows is noted by the debris on the ground.



NMED/SWQB
Official Photograph Log
Photo # 8

Photographer:

Date: February 25, 2015

Time: 13:36 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant

Subject: Secondary clarifier has visible solids in the basin.



NMED/SWQB
Official Photograph Log
Photo # 9

Photographer:

Date: February 25, 2015

Time: 13:22 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant

Subject: The final pond that was formerly used as a chlorine contact basin has visible sold. From this basin, flow is sent to the View Point Lift Station for transport to the City of Sunland Park WWTP.



NMED/SWQB
Official Photograph Log
Photo #10

Photographer:

Date: February 25, 2015

Time: 12:04 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant -

Subject: View Point Lift Station temporary mobile pumps are being used. Oil and gas spills on the ground.



NMED/SWQB
Official Photograph Log
Photo # 11

Photographer:

Date: February 25, 2015

Time: 12:12 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant

Subject: View Point Lift Station temporary mobile pumps are being used. Oil and gas spills on the ground. The area of gravel was noted in the inspection of the City of Sunland Park WWTP conducted by NMED on November 20, 2015. The area had raw sewage, grease and oil spilled on the ground. It was not removed nor cleaned up. It was simply covered by gravel. The contaminants may still affect ground water.



NMED/SWQB
Official Photograph Log
Photo # 12

Photographer:

Date: February 25, 2015

Time: 12:10 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant

Subject: View Point Lift Station temporary mobile pumps are being used. Oil and gas spills on the ground. The area of gravel was noted in the inspection of the City of Sunland Park WWTP conducted by NMED on November 20, 2015. The area had raw sewage on the ground. It was not removed nor cleaned up.



NMED/SWQB
Official Photograph Log
Photo # 13

Photographer:

Date: February 25, 2015

Time: 12:10 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant

Subject: Another wider area photo of the View Point Lift Station. A chlorine tank in the back is used for odor control and dosing directly into the sewer line.



NMED/SWQB
Official Photograph Log
Photo # 14

Photographer:

Date: February 25, 2015

Time: 12:12 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant

Subject: From a man hole on McNutt road, a temporary line is in place to handle the flow. The manhole is where flow is split to either enter the Santa Teresa – Sunland Park North plant or to be sent directly to the Sunland Park plant approximately 7 miles away. This manhole is scheduled for rehabilitation.



NMED/SWQB
Official Photograph Log
Photo #15 & 16

Photographer:

Date: February 25, 2015

Time: 12:15 Hours

City/County: Santa Teresa / Dona Ana

State: New Mexico

Location: Sunland Park North – Santa Teresa Wastewater Treatment Plant

Subject: Another view from a man hole on McNutt road, a temporary line is in place to handle the flow. The manhole is where flow is split to either enter the Santa Teresa – Sunland Park North plant or to be sent directly to the Sunland Park plant approximately 7 miles away. This manhole is scheduled for rehabilitation.



NMED/SWQB
Official Photograph Log
Photo # 17

Photographer:

Date: February 25, 2015

Time: 15:55 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: Sunland Park Wastewater Treatment Plant

Subject: A walk through of the Sunland Park Plant shows the aeration basins are in the same condition as found in the inspection done by NMED on November 20, 2014. The basins remain heavily overloaded with solids and foam.



NMED/SWQB
Official Photograph Log
Photo # 18

Photographer:

Date: February 25, 2015

Time: 16:01 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: Sunland Park Wastewater Treatment Plant

Subject: A walk through of the Sunland Park Plant shows the aeration basins are in the same condition as found in the inspection done by NMED on November 20, 2014. A barrel of liquid chlorine is dripping into the effluent channel and ultraviolet disinfection channel. There is not enough contact time and no de-chlorination in place at this location. Repairs must be made to the ultraviolet system to achieve appropriate disinfection of effluent.



NMED/SWQB
Official Photograph Log
Photo # 19

Photographer:

Date: February 25, 2015

Time: 16:01 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: Sunland Park Wastewater Treatment Plant

Subject: A walk through of the Sunland Park Plant shows the aeration basins are in the same condition as found in the inspection done by NMED on November 20, 2014. Effluent following the ultraviolet disinfection system. The effluent was a slight greenish color and foamy. Repairs must be made to the ultraviolet system to achieve appropriate disinfection of effluent.



NMED/SWQB
Official Photograph Log
Photo # 20

Photographer:

Date: February 25, 2015

Time: 16:03 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: Sunland Park Wastewater Treatment Plant

Subject: A walk through of the Sunland Park Plant shows the aeration basins are in the same condition as found in the inspection done by NMED on November 20, 2014. The solids dewatering belt press has been repaired and increased solids wasting is taking place. Though the plant is still heavily overloaded with solids.



NMED/SWQB
Official Photograph Log
Photo # 21

Photographer:

Date: February 25, 2015

Time: 16:03 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: Sunland Park Wastewater Treatment Plant

Subject: Subject: A walk through of the Sunland Park Plant shows the aeration basins are in the same condition as found in the inspection done by NMED on November 20, 2014. The solids dewatering belt press has been repaired and increased solids wasting is taking place. Though the plant is still heavily overloaded with solids. In addition to dewatering by belt press, solids are being sent to the drying beds in greater volumes than noted in the previous inspection.



**NMED/SWQB
Official Photograph Log
Photo # 22**

Photographer: Leslie Grijalva / Texas River
Protection Program / IBWC, U.S. Section

Date: Date: March 11, 2015

Time: 14:46 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: Sunland Wastewater Treatment Plant – outfall at the Rio Grande

Subject: Complaint of Sewage Discharge to Rio Grande from Sunland Park WWTP NM0029483, the final discharge point for the Santa Teresa WWTP. Note the brown/grey foam, floating solids and turbidity being discharged to the Rio Grande. The discharge appears to be untreated sewage due to poor operations and maintenance at the Sunland Park WWTP. The complainant also noted a strong sewage odor from the discharge.



**NMED/SWQB
Official Photograph Log
Photo # 23**

Photographer: Leslie Grijalva / Texas River
Protection Program / IBWC, U.S. Section

Date: March 11, 2015

Time: 14:23 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: Sunland Wastewater Treatment Plant – outfall at the Rio Grande

Subject: Another view; Complaint of Sewage Discharge to Rio Grande from Sunland Park WWTP NM0029483, the final discharge point for the Santa Teresa WWTP. Note the brown/grey foam, floating solids and turbidity being discharged to the Rio Grande. The discharge appears to be untreated sewage due to poor operations and maintenance at the Sunland Park WWTP. The complainant also noted a strong sewage odor from the discharge.



NMED/SWQB
Official Photograph Log
Photo # 24

Photographer: Photographer: Leslie Grijalva /Texas
River Protection Program / IBWC, U.S. Section

Date: March 11, 2015

Time: 14:40 Hours

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: Sunland Wastewater Treatment Plant – outfall at the Rio Grande

Subject: Another view; Complaint of Sewage Discharge to Rio Grande from Sunland Park WWTP NM0029483, the final discharge point for the Santa Teresa WWTP. Note the brown/grey foam, floating solids and turbidity being discharged to the Rio Grande. The discharge appears to be untreated sewage due to poor operations and maintenance at the Sunland Park WWTP. The complainant also noted a strong sewage odor from the discharge.



NMED/SWQB
Official Photograph Log
Photo # 25

Photographer: Ernesto Carrera – Sunland Park

Date: March 20, 2015

Time: Unknown

City/County: Sunland Park /Dona Ana

State: New Mexico

Location: Outfall of the City of Sunland Park Wastewater Treatment Plant at the Rio Grande

Subject: Effluent discharge nine days after the complaint by the IBWC of raw sewage being discharged. Foam is observed and some degree of turbidity appears to be present.



NMED/SWQB
Official Photograph Log
Photo # 26

Photographer: Ernesto Carrera – Sunland Park

Date: March 20, 2015

Time: Unknown

City/County:

State: New Mexico

Location:

Subject: Looking upstream from the effluent discharge nine days after the complaint by the IBWC of raw sewage being discharged. Foam is observed and some degree of turbidity appears to be present.



NMED/SWQB
Official Photograph Log
Photo # 27

Photographer: Ernesto Carrera – Sunland Park

Date: March 20, 2015

Time: Unknown

City/County: Sunland Park / Dona Ana

State: New Mexico

Location: Effluent of the Sunland Park WWTP to the Rio Grande

Subject: Effluent discharge nine days after the complaint by the IBWC of raw sewage being discharged. Foam is observed and some degree of turbidity appears to be present.

