



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

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ERIKA SCHWENDER  
Director  
Resource Protection Division

**Certified Mail - Return Receipt Requested**

December 9, 2013

The Honorable Danny J. Cruz  
Town of Springer  
Post Office Box 488  
Colbert Avenue  
Springer, New Mexico 87747

**RE: Town of Springer Wastewater Treatment Plant; Minor; Individual Permit; SIC 4952; NPDES Compliance Evaluation Inspection; NPDES # NM0030295; November 14, 2013**

Dear Mr. Cruz:

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.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the Further Explanations section of the inspection 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. 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)  
1445 Ross Avenue, Suite 120  
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

Town of Springer WWTP  
December 9, 2013  
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If you have any questions about this inspection report, please contact Daniel Valenta at (505) 827-2575 or [daniel.valenta@state.nm.us](mailto:daniel.valenta@state.nm.us).

Sincerely,

*/s/Bruce Yurdin*

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

Cc: Carol Peters, USEPA (6EN-WM) by e-mail  
Larry Giglio, USEPA (6WQ-PP) by e-mail  
Racquel Douglas, USEPA (6EN-WM) by e-mail  
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail  
NMED District I, William Chavez by e-mail



### 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	9	5	11	12	1	3	1	1	2	4	17	18	C	19	S	20	1
Remarks																												
T O W N O F S P R I N G E R W W T P																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----												
67						70						71		72		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)  TOWN OF SPRINGER WWTP – 59 NM Hwy 56, Springer, NM. From I-25, take exit 412. Travel to NM 199/21, travel approximately 0.5 mi east, road turns into NM 56/412. Turn south at unpaved road after guardrail. Facility gate is locked.  COLFAX COUNTY	Entry Time /Date 1015 Hours / 11-14-2013	Permit Effective Date March 1, 2008
	Exit Time/Date 1240 Hours / 11-14-2013	Permit Expiration Date February 28, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  Laura Danielson/Town of Springer, WWTP Supervisor/575-483-2682	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number  Danny J. Cruz, Mayor / 575-483-2910/ Post Office Box 488/ 606 Colbert Avenue Springer, New Mexico 87747	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *	Latitude N. 36.351469 Longitude W. -104.584483  SIC 4952

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

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

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

1. Please see further explanations for details.

Name(s) and Signature(s) of Inspector(s)  Daniel Valenta /s/Daniel Valenta	Agency/Office/Telephone/Fax  NMED/SWQB 505-827-2575	Date  12-9-2013
Signature of Management QA Reviewer  Sarah Holcomb /s/Sarah Holcomb	Agency/Office/Phone and Fax Numbers  NMED/SWQB 505-827-2798	Date  12-9-2013

## SECTION A - PERMIT VERIFICATION

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

DETAILS: **Permit Issued on March 1, 2008; Permit Expired: February 28, 2013. There is no application on file with NMED or USEPA for this facility.**

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: **The Town of Springer does not discharge effluent to the Cimarron River at this time. No compliance sampling being done.**

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 No)

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?  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 NO).  
 DETAILS:

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 NO)  
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  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.  Y  N  NA  
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES.  Y  N  NA  
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. No records maintained of calibration checks  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:

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. 0 % 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  
 LAB ADDRESS  
 PARAMETERS PERFORMED

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

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: N/A (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

**Town of Springer Wastewater Treatment Plant**  
**NPDES Permit No. NM0030295**  
**Compliance Evaluation Inspection**  
**November 14, 2013**

Introduction:

On November 14, 2013, Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) accompanied by Sandra Gabaldón, Surface Water (SWQB) and Russell Isaac, Groundwater Quality Bureau (GWQB), conducted a compliance evaluation inspection (CEI) at the Town of Springer Wastewater Treatment Plant (WWTP). The Town of Springer WWTP has a design flow capacity of 0.30 million gallons per day (MGD) and is classified as a minor 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 NM0030295. This permit regulates the WWTP discharge to the Cimarron River in Segment 20.6.4.306 *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC)*. This segment includes the designated uses of irrigation, 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 representative, observations made by NMED staff, and records and reports kept by the permittee and/or NMED.

The inspector made introductions, stated the purpose of the inspection and presented credentials to Ms. Laura Danielson, Certified Operator, at the Town of Springer's City Hall at approximately 1015 hours. The inspectors and Ms. Danielson toured the WWTP starting at approximately 1031 hours. Preliminary findings were discussed with Ms. Danielson during the inspection and at an exit interview at the end of the inspection. Mr. Cruz, Mayor, was not available on the day of the inspection to discuss preliminary findings.

There has been no reported discharge into the Cimarron River from this facility. The Cimarron River from Canadian River to Cimarron Village does not fully support warmwater aquatic life. Probable causes of impairment are nutrient/eutrophication biological indicators. The Cimarron River Watershed Total Maximum Daily Load (TMDL) dated September 3, 2010 establishes phase I and Target nutrient wasteload allocations for total phosphorus and total nitrogen. The Town of Springer WWTP is not designed to treat effluent for the removal of nitrogen and phosphorus. The Town of Springer submitted an application to the NMED Groundwater Quality Bureau (GWQB) on April 25, 2011 for activated sludge treatment with UV disinfection and effluent storage in evaporation lagoons. The Town of Springer has not applied for a renewal of the NPDES Permit with Region VI United States Environmental Protection Agency (USEPA).

Treatment Scheme:

The Town of Springer has a population of approximately 1,047 (2010 Census). The Springer Correctional Facility has an inmate population of 296. The Town of Springer WWTP has not been fully or consistently operational since initial construction of the package plant was completed in January of 2007. **Effluent at the time of the inspection is bypassing the treatment plant completely and being discharged to the lagoons, (see photo 1).**

**Town of Springer Wastewater Treatment Plant**  
**NPDES Permit No. NM0030295**  
**Compliance Evaluation Inspection**  
**November 14, 2013**

The following is a description of the intended proposed hydraulic flow pattern for the WWTP and solids management if the plant was functional. All effluent is stored in three ponds; the fourth pond is no longer functional.

Influent would pass through a 6-inch Parshall flume with an ultrasonic flow meter connected to the plant's Programmable Logic Controller (PLC). Flow continues through an automatic mechanical bar screen with a manually-cleaned bypass bar screen in channel then enters an influent wet/equalization (EQ) basin. The wet well contains a vertical turbine mixer and two submersible pumps. The wet well overflows to a one million gallon PVC lined lagoon.

After the EQ basin, flow would be pumped to a Wes Tec hybrid activated sludge plant that includes a STM-aerotator aeration mixing unit. The plant was designed to accommodate an average daily flow of 150,000 gallons per day (GPD) with a peak hourly flow of 300,000 gpd. The STM-Aerotator mechanism would rate in the aeration basin providing air and mixing for the fixed and suspended growth bacteria. The activated sludge fixed film system has an aeration basin volume of 56,540 gallons with a maximum water depth of 15.5 feet. The STM aerator would capture atmospheric air and slowly release it as coarse bubble aeration. The amount of aeration would be controlled using a variable speed drive connected to a rotor causing it to rotate faster or slower based on the actual oxygen demand. During the rotation, cascade aeration would elevate the dissolved oxygen in the upper layer of the basin. The combination of the slow rotation of the STM-Aerotator, coarse bubbler release and additional peripheral mixing from the paddle would insure a thoroughly mixed system. The STM-Aerotator includes a large surface area for fixed film growth. The polypropylene discs provide an environment for attached growth organisms. The fixed film component would increase the effective sludge age and improve the sludge settling characteristics.

After the aeration basin, the influent would flow into a rectangular chain drive secondary clarifier with polychem chain and flight sludge collector assembly. Return activated sludge (RAS) and scum skimming from the clarifier would be returned by gravity flow to the influent wet well/EQ basin and then would be pumped back to the aeration basin.

After the clarifier, flow would enter a Ultra-Violet (UV) unit with two banks of bulbs constructed in series. A tie in and outfall to the evaporation basins would be constructed.

Waste activated sludge (WAS) would be pumped using a submersible pump from a collection trough at the bottom of the clarifier to the aerobic sludge digester with a Hurricane mixer. WAS would be removed from the digester when needed. During sludge removal, a polymer mixture would be added to the sludge in the plant's UV/Lab building. Decant would be returned to the influent wet well/EQ basin. The sludge would be dewatered by a 190-lbs/hour belt press on site. A screw feeder would place sludge in an on-site dumpster.

Further Explanations

**Town of Springer Wastewater Treatment Plant**  
**NPDES Permit No. NM0030295**  
**Compliance Evaluation Inspection**  
**November 14, 2013**

**Section A – Permit Verification – Overall Rating of “Unsatisfactory”**

The permit requires in Part III.A.4:

*If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The application shall be submitted at least 180 days before the expiration date of this permit. The director may grant permission to submit an application less than 180 days in advance but no later than the permit expiration date. Continuation of expiring permits shall be governed by regulation promulgated at 40 CFR Part 122.6 and any subsequent amendments.*

**Findings** for Permit Verification:

- The permittee has failed to submit an application 180 days before the expiration date of the permit which was February 2013.
- The permittee has not submitted an application for a renewal of permit NM0030295 as of the day of this inspection November 14, 2013.
- The permittee has not submitted a letter of permit termination to EPA.

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

Photographer: Daniel Valenta	Date: 11-14-2013	Time: 1015 Hours
City/County: Town of Springer / Colfax County		State: New Mexico
Location: Town of Springer WWTP, facing northeast.		
Subject: Clarifier chamber is not functional; drive chain hit the guide rail and broke. The STM Aerator unit is operating; the fixed film on the aerator is black in color.		



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

Photographer: Daniel Valenta	Date: 11-14-2013	Time: 1015 Hours
City/County: Town of Springer / Colfax County		State: New Mexico
Location: Town of Springer WWTP, facing south west.		
Subject: Raw effluent is bypassing the WWTP and discharging into the lagoon.		

