



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**

March 4, 2015

Mr. Bobby Towle  
Operations Manager  
New Mexico Water Service Company  
401 Horner Street  
Belen, New Mexico 87002

**Re: Rio Del Oro Wastewater Treatment Plant; Minor; Individual Permit; SIC 4952;  
Compliance Evaluation Inspection; NPDES Permit NM0030414; February 20, 2015**

Dear Mr. Towle:

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)  
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

If you have any questions about this inspection report, please contact Sandra Gabaldon at (505) 827-1041 or at [sandra.gabaldon@state.nm.us](mailto:sandra.gabaldon@state.nm.us).

Sincerely,

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  
Gladys Gooden-Jackson (6EN-WC) by e-mail  
Tung Tguyen, (6EN-WQ) by email  
NMED District I 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 <input type="checkbox"/> N <input type="checkbox"/> 2 <input type="checkbox"/> 5 <input type="checkbox"/> 3 <input type="checkbox"/> N <input type="checkbox"/> M <input type="checkbox"/> 0 <input type="checkbox"/> 0 <input type="checkbox"/> 3 <input type="checkbox"/> 0 <input type="checkbox"/> 4 <input type="checkbox"/> 1 <input type="checkbox"/> 4 <input type="checkbox"/> 11 <input type="checkbox"/> 12 <input type="checkbox"/> 1 <input type="checkbox"/> 5 <input type="checkbox"/> 0 <input type="checkbox"/> 2 <input type="checkbox"/> 2 <input type="checkbox"/> 0 <input type="checkbox"/> 17 <input type="checkbox"/> 18 <input type="checkbox"/> C <input type="checkbox"/> 19 <input type="checkbox"/> S <input type="checkbox"/> 20 <input type="checkbox"/> 1 <input type="checkbox"/>					
Remarks					
M I N O R W W T P					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> 69	70 <input type="checkbox"/> 3 <input type="checkbox"/>	71 <input type="checkbox"/> N <input type="checkbox"/>	72 <input type="checkbox"/> N <input type="checkbox"/>	73 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	74 75 <input type="checkbox"/> 80

#### Section B: Facility Data

Name and Location of Facility Inspected <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i> Rio Del Oro Wastewater Treatment Plant Take 1-25 South, Exit 215, south on NM 47. From junction 6 and NM47, turn left, then turn left onto Patricio. Continue to Tome cemetery and turn left on dirt road – follow road to WWTP.	Entry Time /Date 0940 Hours / February 20, 2015	Permit Effective Date April 01, 2010
	Exit Time/Date 1115 Hours / February 20, 2015	Permit Expiration Date March 31, 2015
<b>VALENCIA COUNTY</b>		
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Porfirio Baca, Level I Certified Operator	Other Facility Data SIC 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Robert Towle, Operations Manager / (505) 864-2218 / (505) 463-1395 (cell) New Mexico Water Service Company 401 Horner Street Belen, NM 87002	Contacted Yes <input type="checkbox"/> * <input checked="" type="checkbox"/> No <input type="checkbox"/>	LAT: 34 28.28.34 LONG: -106 42 21.45

#### 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	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	S	Laboratory	N	Storm Water	N	Other:

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

Please see checklist and further explanations for details of findings

Name(s) and Signature(s) of Inspector(s) Sandra Gabaldón	Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041/(505) 827-0610	Date
Signature of Management QA Reviewer Michelle Lemon, Municipal Team Leader	Agency/Office/Phone and Fax Numbers NMED/SWQB/(505) 82-2819/(505) 827-0610	Date

**SECTION A - PERMIT VERIFICATION**

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS  S    (FURTHER EXPLANATION ATTACHED NO)

DETAILS: Permit expires March 31, 2015. Permittee has submitted their application with the 180 days as required.

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE  Y

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

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

4. ALL DISCHARGES ARE PERMITTED  Y

**SECTION B - RECORDKEEPING AND REPORTING EVALUATION**

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.  S  M   (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

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

b) NAME OF INDIVIDUAL PERFORMING SAMPLING  Y

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

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

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   U  (FURTHER EXPLANATION ATTACHED NO)

DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.  S   U

2. TREATMENT UNITS PROPERLY MAINTAINED.  S   U

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED.  S   U

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

5. ALL NEEDED TREATMENT UNITS IN SERVICE  S   U

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.  S   U

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.  S

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?<br>IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?<br>HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? | <input type="radio"/> Y <input checked="" type="radio"/> N <input type="radio"/> NA<br><input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA<br><input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA |
| 10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?<br>IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?  | <input type="radio"/> Y <input checked="" type="radio"/> N <input type="radio"/> NA<br><input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA  |

**SECTION D - SELF-MONITORING**

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

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

**SECTION E - FLOW MEASUREMENT**

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED NO).

- |   |   |
|---|---|
| 1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.<br>TYPE OF DEVICE : Turbine meter in discharge line of the turbine pump. This is a no discharge facility. Total Re-use. | <input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA   |
| 2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.   | <input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA   |
| 3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.  | <input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA   |
| 4. CALIBRATION FREQUENCY ADEQUATE.<br>RECORDS MAINTAINED OF CALIBRATION PROCEDURES.<br>CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.  | <input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA<br><input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA<br><input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA |
| 5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.   | <input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA   |
| 6. HEAD MEASURED AT PROPER LOCATION.  | <input type="radio"/> Y <input type="radio"/> N <input checked="" type="radio"/> NA   |
| 7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.  | <input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA   |

**SECTION F - LABORATORY**

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED NO).

- |   |   |
|---|---|
| 1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES) | <input checked="" type="radio"/> Y <input type="radio"/> N <input type="radio"/> NA |
|---|---|

**SECTION F - LABORATORY (CONT'D)**

- 2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED Y N X NA
- 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. X S O M U NA
- 4. QUALITY CONTROL PROCEDURES ADEQUATE. X S M U NA
- 5. DUPLICATE SAMPLES ARE ANALYZED. 100 % OF THE TIME. X Y N NA
- 6. SPIKED SAMPLES ARE ANALYZED.     % OF THE TIME. Y N X NA
- 7. COMMERCIAL LABORATORY USED. X Y N NA

LAB NAME Hall Environmental Analysis Laboratory Wilkins Environmental Consulting & Laboratories  
 LAB ADDRESS 4901 Hawkins, NE; Albuquerque, NM 87109 832 NW 67<sup>th</sup> Street; Oklahoma City, OK 73116  
 PARAMETERS PERFORMED BOD, TSS, E. coli Biomonitoring

**SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS.** S M O U X NA (FURTHER EXPLANATION ATTACHED NO).

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	NONE	NONE	NONE	NONE	NONE	UNKNOWN	

RECEIVING WATER OBSERVATIONS Total Re-use facility. Discharge not observed.

**SECTION H - SLUDGE DISPOSAL**

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

- 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. X S M U NA
- 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. X 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 X 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

**RIO DEL ORO WWTP  
COMPLIANCE EVALUATION INSPECTION  
NPDES Permit No. NM0030414  
INSPECTION DATE: February 20, 2015**

**INTRODUCTION**

A compliance evaluation inspection (CEI) was conducted at the Rio del Oro WWTP on February 20, 2015 by Sandra Gabaldón of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). This facility is a private domestic WWTP classified under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned NPDES permit number NM0030414. The facility design flow is 0.3 million gallons a day (MGD).

The Rio del Oro WWTP discharges into La Canada de La Loma de Arena thence to La Constancia Ditch, thence to the Rio Grande in segment 20.6.4.105 (NMAC State of New Mexico Standards for Interstate and Intrastate Surface Waters). Designated uses of Segment 20.6.4.105 are irrigation, marginal warmwater aquatic life, livestock watering, public water supply, wildlife habitat and primary contact.

The NMED performs a certain number of CEI's annually for the United States Environment Protection Agency (USEPA). The purpose of this inspection is to provide the USEPA with information to evaluate the permittee's compliance with their NPDES permit. The enclosed inspection report is based on verbal information supplied by the permittee's representative, observations made by the NMED inspector, and a review of records maintained by the permittee, commercial laboratory, and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative further explanations section of this report.

The inspector arrived at the facility at 0940 hours and conducted an entrance interview with the on-site operator, Mr. Porfirio Baca. Mr. Baca called Mr. Towle, Wastewater Operations Supervisor, and notified Mr. Towle of the impending inspection. Sandra Gabaldon, inspector, showed her credentials to Mr. Baca and preceded with the inspection, which included a tour of the facility, inspection of laboratory equipment and methods, and records review.

**TREATMENT SCHEME:**

The Rio del Oro wastewater treatment facility is a membrane bioreactor.

Raw sewage is discharged into one of two (2) automatic fine bar screens (one on-line; one standby) that are provided with a common conveyor/washer/compactor (CWC). The CWC removes organics from the screenings and automatically dumps the washed and compacted screenings into a dumpster that is emptied at a landfill.

The influent from the bar screen discharges into the pre-air basin to be mixed with the activated sludge (mixed liquor suspended solids). Not only are BOD and TSS removed in the pre-aeration basin, nitrogen is also removed with alternating periods of aeration (nitrification) and anoxic mixing (denitrification).

Two (2) submersible pumps continuously pump the mixed liquor from the pre-aeration basin into each of the two (2) separate bioreactors. Each reactor is equipped with four (4) submerged membrane units (SM\*) which have 200 flat plate filters in each unit. Facility effluent is withdrawn through the flat plate membranes (filtered) by permeate pumps (two operational; one standby), disinfected with ultraviolet light, and discharged to a holding basin for irrigation reuse. Two (2) UV disinfection units for bacterial control are being utilized at the end of the treatment scheme.

The excess mixed liquor suspended solids in the bioreactors automatically recycles back to the pre-aeration basin through telescoping valves. Waste activated sludge is removed from both bioreactors daily and is discharged into the sludge holding tank. Sludge is removed weekly from the holding tank and taken to the surface disposal site.

Air is supplied to the pre-aeration and bioreactor basins with two (2) separate aeration systems. Two (2) aeration blowers are provided for each system (one on line; one standby). The MBR is monitored and controlled by a programmable logic controller (PCL) that also provided supervisory control and data acquisition for alarm notification. Operator control is provided through a human-machine interface that is simply a PC located in the admin/lab building. In the event of a failure of the PLC, the facility can also be operated manually.

### **SLUDGE MANAGEMENT:**

The facility pumps sludge from the aerobic digester into a septage truck which hold approximately 2,000 gallons. From here, the sludge is surface disposed at a dedicated site approximately 4 miles from the facility. The sludge is surface disposed and incorporated into the soil approximately four hours after application.

**Compliance Evaluation Inspection**  
**Rio Del Oro WWTP**  
**NPDES Permit No. NM0030414**  
**Inspection Date: February 20, 2015**

**Further Explanations:**

Note: The sections are arranged according to the format of the enclosed EPA inspection checklist (Form 3560-3), rather than being ranked in order of importance.

**Section D – Self Monitoring – Overall Rating of “Marginal”**

The permit requires in Part I, Section D. Pollution Prevention:

*The permittee shall continue a program directed towards optimizing the efficiency and extending the useful life of the facility. The permittee shall consider the following items in the program:*

- a. The influent loadings, flow and design capacity;*
- b. The effluent quality and plant performance;*
- c. The age and expected life of the wastewater treatment facility's equipment;*
- d. Bypasses and overflows of the tributary sewerage system and treatment works;*
- e. New developments at the facility;*
- f. Operator certification and training plans and status;*
- g. The financial status of the facility;*
- h. Preventative maintenance programs and equipment conditions, and;*
- i. An overall evaluation of conditions at the facility.*

The permit requires in Part III. Monitoring Procedures:

- a. Monitoring must be conducted according to test procedure approve under 40 CFR 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 Self-Monitoring:

The permittee, according to Mr. Baca (operator), does not have a written pollution prevention plan.

The permittee does total residual chlorine (TRC) analysis when they clean their MBRs. However, on inspection of their Chlorine meter, it was noted that the glass cuvettes had been broken.

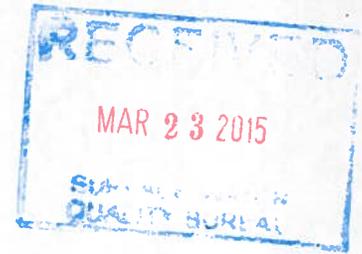
The BOD samples on August 8, 2024, August 13, 2014 and August 20, 2014 had oxygen depletion on their method blanks that was greater than  $>0.2$  mg/L. This may be an indication that something is wrong with the dilution water in the blanks. Contamination of the glassware may be an issue. However, excessive oxygen demand in the dilution water blank does not invalidate the data in the BOD test. The commercial laboratory should follow up with cleaning of the glassware and/or calibration of the DO meter.

Samples submitted to the commercial laboratory on August 20, 2014 had a temperature recorded at  $8^{\circ}\text{C}$  for BOD and TSS. This invalidates the analysis of these parameters. The holding temperature is  $\leq 6^{\circ}\text{C}$  for BOD and TSS. The holding temperature for E. coli is  $<10^{\circ}\text{C}$ . The samples from August 20, 2014, for BOD and TSS should not be used for DMR reporting.



**NEW MEXICO WATER SERVICE COMPANY**

March 17, 2015



Bruce Yurdin  
Surface Water Quality Bureau  
Point Source Regulation Section  
PO Box 5469  
Santa Fe, NM 87502-5469

**RE: COMPLIANCE EVALUATION INSPECTION (CEI), February 20, 2015  
RIO DEL ORO WASTEWATER TREATMENT FACILITY  
NPDES PERMIT NO. NM0030414**

Dear Mr. Yurdin:

We are in receipt of your letter on February 20, 2015 concerning the referenced inspection. Listed below are the findings noted during the inspection and included in the further explanations section of the report. Our responses follow each finding under the header "Action Taken".

**Section D – Self Monitoring – overall Rating of “Marginal”**

*The Permit in Part I, Section D. Pollution Prevention:*

**Findings**

*The permittee doesn't have a written pollution prevention plan.*

**Action Taken**

The permittee has all this information in the O/M manual that was provided by vendor when the Wastewater Treatment facility was designed.

**Findings**

*Inspector noticed glass cuvettes broken on chlorine meter.*

**Action Taken**

Ordered new cuvettes on March 16, 2015, will receive by March 19, 2015

**Findings**

*BOD Samples taken in August 2014 had an oxygen depletion on their method blanks that was greater than >0.2 mg/l.*

**Action Taken**

Contacted Hall Environmental Analysis Laboratory, the lab we use, and talked to Manager Andy Freeman. Mr. Freeman acknowledged the problem, which they subsequently corrected.

**Findings**

*Samples submitted to commercial laboratory on August 20, 2014 had temperature recorded at 8°C.*

**Action Taken**

We had been using blue ice packs for temperature control, but are now utilizing ice for that purpose.

Should you have any questions or comments regarding our response to your CEI findings of the Rio del Oro Wastewater Treatment Facility, please contact me.

Sincerely,



Paul Risso  
General Manager  
New Mexico Water Service Company  
505-864-2218 Ext. 226 (Office)  
505-864-8438 (Fax)  
505-264-4839 (cell)  
prisso@newmexicowater.com

Cc Ron Hay  
Bobby Towle, NMWSC  
NMWSC File  
Racquel Douglas, 6EN-WM