



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

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RYAN FLYNN
Cabinet Secretary

BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

September 9, 2014

Dr. Jorge A. Garcia, Utilities Director
City of Las Cruces
Post Office Box 20000
Las Cruces, New Mexico 88004

**Re: City of Las Cruces, East Mesa Water Reclamation Plant; Major; Individual Permit;
SIC 4952; Compliance Evaluation Inspection; NPDES Permit NM0030872;
August 26, 2014**

Dear Dr. Garcia:

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

City of Las Cruces, East Mesa Water Reclamation Facility
September 9, 2014
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If you have any questions about this inspection report, please contact Sandra Gabaldon at (505) 827-1041 or at sandra.gabaldon@state.nm.us.

Sincerely,

/s/ Bruce J. Yurdin

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

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson (6EN-WC) 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	8	7	2	11	12	1 4	0	8	2	6	17	18 C	19 S	20 1	
M	A	J	O	R	D	O	M	E	S	T	I	C	W	W	T	P						
Inspection Work Days				Facility Evaluation Rating				BI	QA	Reserved												
67			1	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) City of Las Cruces, East Mesa Water Reclamation Facility, 5150 E. Lohman Ave., Las Cruces, NM – Take Exit 3, from I-25 South, E. Lohman Avenue approximately 1.9 mi to locked gate. DOÑA ANA COUNTY	Entry Time /Date 1330 HOURS / 08-26-2014	Permit Effective Date NOVEMBER 1, 2013
	Exit Time/Date 1620 HOURS / 08-26-2014	Permit Expiration Date OCTOBER 31, 2018
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jose E. Hernandez, Supervisor, (575) 528-3601 / joshernandez@las-cruces.org / cell (575) 202-5034 Chester Ramsey, Certified Operator IV, (575) 528-3601 Luis J. Guerra, Lead Laboratory Technician, (575) 528-3604 / lguerra@las-cruces.org Doug Paczynski, Plant Manager, (575) 528-3599 / dpaczynski@las-cruces.org / cell (575) 993-9647	Other Facility Data OUTFALL 001 Latitude: N 32.33022 Longitude: W 106.7129	
Name, Address of Responsible Official/Title/Phone and Fax Number Dr. Jorge A. Garcia, Utilities Director / (575) 528-3502 / (575) 528-3511 City of Las Cruces 680 Motel Blvd Las Cruces, NM 88005	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
SIC 4952		

Section C: Areas Evaluated During Inspection

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

S	Permit	S	Flow Measurement	S	Operations & Maintenance	S	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	S	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)

- The facility is not discharging at this time. Reclaimed water is being used to irrigate the Sonoma Ranch Golf Course.

Name(s) and Signature(s) of Inspector(s) Sandra Gabaldon /s/ Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041/(505) 827-0610	Date 09-09-2014
Signature of Management QA Reviewer /s/ Michelle Lemon Michelle Lemon, Municipal Team Lead	Agency/Office/Phone and Fax Numbers NMED/SWQB/(505) 827-2819/(505) 827-0610	Date 09-09-2014

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

X S M U NA (FURTHER EXPLANATION ATTACHED NO)

DETAILS:

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE

X Y N NA

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

O Y N X NA

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

X Y N NA

4. ALL DISCHARGES ARE PERMITTED

X Y N NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.

X S M U NA (FURTHER EXPLANATION ATTACHED NO)

DETAILS:

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.

X Y N NA

2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.

X S M U NA

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

X Y N NA

b) NAME OF INDIVIDUAL PERFORMING SAMPLING

X Y N NA

c) ANALYTICAL METHODS AND TECHNIQUES.

X Y N NA

d) RESULTS OF ANALYSES AND CALIBRATIONS.

X Y N NA

e) DATES AND TIMES OF ANALYSES.

X Y N NA

f) NAME OF PERSON(S) PERFORMING ANALYSES.

X Y N NA

3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.

X S M U NA

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

X S M U NA

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

X Y N NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.

X S M U NA (FURTHER EXPLANATION ATTACHED NO)

DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.

X S M O U NA

2. TREATMENT UNITS PROPERLY MAINTAINED.

X S M O U NA

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .

X S M O U NA

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

X S M O U NA

5. ALL NEEDED TREATMENT UNITS IN SERVICE

X S M O U NA

6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.

X S M O U NA

7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.

X S M U NA

8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.

X Y N NA

STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.

X Y O N NA

PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.

X 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: pH is taken on site. All other parameters are either analyzed at Jacob Hands WWTP or contracted out. Please see commercial laboratories for further 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. ISCO sampler used 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:
 TWO **MAG METERS** ARE BEING CALIBRATED IN UNISON TO VERIFY CALIBRATION ON A MONTHLY BASIS; YEARLY CALIBRATION IS ALSO BEING PERFORMED BY AN OUTSIDE REPRESENTATIVE.
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. Y N NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. Closed channel Y N NA
6. HEAD MEASURED AT PROPER LOCATION. Closed Channel 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: pH is the only parameter being measured onsite. The other samples are collected and analyzed by the City of Las Cruces Jacob Hands Waste Water Treatment Plant and commercial laboratories.

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. Jacob Hands laboratory not inspected. S M U NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. Jacob Hands laboratory not inspected. S M U NA

5. DUPLICATE SAMPLES ARE ANALYZED. ~10% OF THE TIME. Y N NA

6. SPIKED SAMPLES ARE ANALYZED. ~100% OF THE TIME. Y N NA

7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME City of Las Cruces, Jacob Hands WWTP Geotechnical Environmental Water Resources Ecological Continental Analytical Services, Inc.

LAB ADDRESS 2851 W. Amador, Las Cruces, NM 4601 DTC Boulevard, Suite 900, Denver, CO 525 N. Eighth St. Salina KS

PARAMETERS PERFORMED BOD, E. coli, TSS Biomonitoring Thallium, Bis (2-Ethylhexyl) Phthalate

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 No discharge on the date of inspection. Permittee is using reclaimed water to irrigate the Sonoma Golf Course.

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

City of Las Cruces
East Mesa Water Reclamation Facility
NPDES Permit No. NM0030872
Compliance Evaluation Inspection
August 26, 2014

Further Explanations

Introduction

On August 26, 2014, Sandra Gabaldón of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the City of Las Cruces, East Mesa Water Reclamation Facility in Doña Ana County, Las Cruces, New Mexico. The facility has a design flow capacity of 1.0 MGD (Million Gallons per Day) and is classified as a major municipal discharger under the federal Clean Water Act (CWA), Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0030872 which regulates discharge of treated sanitary wastewater from Outfall 001 to the Southfork Arroyo, thence to the Alameda Arroyo, thence to the Las Cruces Lateral, thence to the Rio Grande in Segment 20.6.4.101 (*State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC)*) of the Rio Grande Basin.

NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate the Permittee's compliance with their NPDES permit. 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.

Ms. Gabaldón, arrived at the facility at approximately 1330 hours on August 26, 2014, introduced herself to Mr. Chester Ramsey, Certified Operator. Previously, Ms. Gabaldón had arrived at the City of Las Cruces, Jacob Hands Wastewater Treatment Plant (WWTP) and was greeted by Mr. Luis Guerra, Lead Laboratory Technician and Mr. Jose Hernandez, Supervisor. Mr. Hernandez accompanied Ms. Gabaldón to the East Mesa Water Reclamation Facility. At the time of arrival at Jacob Hands and East Mesa Water Reclamation Facility, Ms. Gabaldon presented her credentials, and explained the purpose of her inspection. Mr. Ramsey and Mr. Hernandez toured the facility with Ms. Gabaldón. An exit interview was conducted at the City of Las Cruces Jacob Hands Wastewater Treatment Plant with Mr. Guerra, Mr. Hernandez and Mr. Doug Paczynski, Plant Manager, who previously was unavailable.

Treatment Scheme

The collection system allows domestic wastewater from the east mesa side of Las Cruces, including the Mountain View Regional Medical Center, to be directed to the East Mesa Water Reclamation Facility. Previously wastewater was sent to the City of Las Cruces Jacob Hands Wastewater Treatment Plant. Because of this connection, it is still possible to send any influent to the Jacob Hands WWTP in an emergency situation.

Influent enters the facility to be treated by a mechanical drum screen and a spray wash. Screenings are collected and bagged at a compactor station for disposal. The plant has two identical treatment trains (east and west). Influent enters a selector tank followed by two first stage aeration tanks. A "blockout" in the aerator tank can be operated to allow wastewater to flow to the second stage aeration tank. Solids from the first stage of aeration tank can be sent to a digester tank (two digester tanks available). Wastewater then flows through an inlet screen to a rectangular clarifier basin. Return Activated Sludge (RAS) is sent through a trough and gravity fed back into the aeration basin. Following clarification, flow is sent to disc filter drums. The backwash from the disc filter drums is pumped back to the headworks. After the filter drums, flow enters the ultra-violet unit for disinfection.

After disinfection, effluent is metered prior to discharge at Outfall 001. According to the permit application, this facility has a limited discharge of approximately 0.09 MGD during the months of November through February. The City of Las Cruces has a State of New Mexico Ground Water Discharge Permit to use reclaimed water for irrigation at the Sonoma Golf Course along with other city owned properties.

Sludge:

Biosolids are transported to the City of Las Cruces Jacob Hands WWTP via a 6,000 gallon truck. The biosolids are combined with those generated at the Jacob Hands facility. Sludge is sent to the City of Las Cruces West Mesa Compost facility for further treatment.

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Sandra Gabaldón	Date: August 26, 2014	Time: 1403 hours
City/County: Las Cruces / Dona Ana		State: New Mexico
Location: City of Las Cruces East Mesa Water Reclamation Facility		
Subject: Close up view of enclosed disc filter		



NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Sandra Gabaldón	Date: August 26, 2014	Time: 1424 hours
City/County: Las Cruces / Dona Ana		State: New Mexico
Location: City of Las Cruces East Mesa Water Reclamation Facility		
Subject: West aeration basin		



NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Sandra Gabaldón	Date: August 26, 2014	Time: 1424 hours
City/County: Las Cruces / Dona Ana		State: New Mexico
Location: City of Las Cruces East Mesa Water Reclamation Facility		
Subject: Discharge pipe		

