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Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 19, 2016

Mr. Juan Fuentes, City Manager
City of Truth or Consequences
505 Sims Street
Truth or Consequences, New Mexico 87901

RE: City of Truth or Consequences WWTP; Major; Multi-Sector General Permit SIC 4952; NPDES Compliance Evaluation Inspection; NMR053105; March 12, 2016

Dear Mr. Fuentes:

Enclosed please find a copy of the report 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.

Problems noted during this inspection are listed in the 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. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address above) in writing within 30 days from the date of this letter. Further, notify in writing both USEPA (Racquel Douglas, USEPA (6EN), 1445 Ross Ave., Dallas, Texas, 75202), NMED regarding modifications and compliance schedules.

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

Sincerely,

/s/Bruce Yurdin

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

Cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Darlene Whitten-Hill, USEPA (6EN) by e-mail
NMED District III, Mike Kesler by e-mail
Robert Houston, USEPA (6EN) by e-mail
Sandra Whitehead, Mayor Pro-Tem

EPA

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	3	NPDES	11	12	yr/mo/day	17	18	Inspec. Type	19	Inspector	20	Fac Type
	N	5	N	MR0531051			160512			~		S		2

Remarks: WWTP SECTOR T

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
			2			N		N					

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time /Date	Permit Effective Date
City of Truth or Consequences WWTP **1595 Animal Shelter Road** **Truth or Consequences, New Mexico 87901 Sierra County**	**1157 hours/5-12-16**	**6/4/2015**
	Exit Time/Date **1600 hours/5-12-16**	Permit Expiration Date **6/4/2020**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Mr. Jesus Salayandia/WWTP Superintendent/575-894-7331	**GPS:** **N. 33.11472** **W. -107.282458** **SIC: 4952** **Activity code: T**
Name, Address of Responsible Official/Title/Phone and Fax Number **Mr. Juan Fuentes, 505 Sims Street, Truth or Consequences, New Mexico 87901/** **City Manager/575-894-6674 ext. 320**	Contacted Yes [ ] No [*]

Section C: Areas Evaluated During Inspection

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

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	U	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	N	Laboratory	U	Storm Water	N	Other:

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

1. **Facility has coverage under NMR053105, active October 1, 2015.**
2. **The facility has not completed three Quarterly Routine inspections.**
3. **No Quarterly Visual Assessments have been completed.**
4. **A yearly Annual report must be submitted before January 30th, see MSGP section 7.5.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Daniel Valenta */s/Daniel Valenta*	**NMED/SWQB 505-827-2575**	5/18/2016
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Sarah Holcomb */s/Sarah Holcomb*	**NMED/SWQB 505-827-2798**	5/18/2016

NPDES Industrial Storm Water Checklist (MSGP)

National Database Information		General	
Inspection Type	MSGP	Inspector Name	Daniel Valenta
NPDES ID Number	NMR053105	Telephone	505-827-2575
Inspection Date	5/12/2016	Entry Time	1157
Inspector Type *(circle one)*	EPA [State] EPA Oversight	Exit Time	1600
Facility Sector/ SIC/Activity Code	SIC 4952/Sector T	Signature	

Facility Location Information				
Name/Location/ Mailing Address	City of Truth or Consequences/ 1595 Animal Shelter Road, Truth or Consequences, New Mexico, 87901			
GPS Coordinates	Latitude	33.11472	Longitude	-107.282458
Receiving Water(s)	Rio Grande - 20.6.4103 NMAC			

Contact Information		
	Name(s)	Telephone
Name(s) and Role(s) of All Parties Meeting the Definition of Operator	Mr. Jesus Salayandia/WWTP Superintendent	575-894-7331
Facility Contact	Mr. Jesus Salayandia/WWTP Superintendent	575-894-7331
Authorized Official(s)	Mr. Juan Fuentes/City Manager Ms. Sandra Whitehead/Mayor Pro-Tem	575-894-6674 ext. 320 575-740-1285

Basic Permit Information			Basic SWPPP Information		
Permit Coverage	Y	N	SWPPP Prepared & Available	[Y]	N
Permit Type	[General]	Individual	SWPPP Contents Satisfactory	Y	[N]
Operational Date	unknown		SWPPP Implementation Satisfactory	Y	[N]
NOI/Application Date	10/1/2015		SWPPP Date	9/26/2015	
If applicable, is no exposure certification on file?	Y	N	*Intentionally left blank*		

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Review			
General			**Notes:**
Was the SWPPP completed prior to NOI submission?	[Y]	N	
Copy of the NOI and acknowledgment letter from EPA?	Y	[N]	Just the NOI, acknowledgment letter missing.
Copy of the permit language?	[Y]	N	
Have copies of inspection reports/all other documentation been retained as part of the SWPPP for 3 years from date permit coverage expires?	Y	N	Permit became active on 10/1/2015.
Does the SWPPP contain a signed/certified statement indicating that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to precipitation, in accordance with the substantive requirements in 40 CFR 122.26(g)(4)(iii)? Applicable to: • Routine facility inspection (3.1.1) • Quarterly visual assessment (3.2.3) • Benchmark monitoring (6.2.1.3).	Y	N	n/a
Does the SWPPP include copies of relevant parts of other documents (e.g., SPCC) referenced in the SWPPP?	Y	[N]	
Does the SWPPP include documentation to support eligibility under the Endangered Species Act?	[Y]	N	Endangered or threatened species documents.
Does the SWPPP include documentation to support eligibility under the Historic Preservation Act?	[Y]	N	
Does the SWPPP include documentation to support eligibility under NEPA (New Source)?	Y	N	n/a
Did all “operators” sign/certify the SWPPP?	Y	[N]	No part of the SWPPP has been signed.
Is the storm water pollution prevention team identified (name or title)?	[Y]	N	May need to be updated.
Are the storm water pollution prevention team’s responsibilities identified?	[Y]	N	

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
SWPPP provides a description of the facility's industrial activities?	[Y]	N	
Is there a general location map (e.g., USGS quadrangle map) with enough detail to identify the location of the facility and all receiving waters for storm water discharges?	Y	[N]	Does not show receiving waters.
Is there a site specific site map?	[Y]	N	
Does the site map contain the size of the property in acres?	[Y]	N	
Does the site map contain the location and extent of significant structures and impervious surfaces?	Y	[N]	
Does the site map contain directions of storm water flow (indicated by arrows)?	Y	[N]	Details lacking in direction of flows.
Does the site map contain locations of all existing structural control measures?	Y	[N]	
Does the site map contain locations of all receiving waters in the immediate vicinity of the facility, indicating if any of the waters are impaired, and if so, whether the waters have TMDLs established for them?	Y	[N]	
Does the site map contain locations of all storm water conveyances including ditches, pipes and swales?	Y	[N]	
Does the site map contain locations of all potential pollutants and significant materials identified under Part 5.2.2?	Y	[N]	
Does the site map contain locations where significant spills or leaks identified under Part 5.2.3.3 have occurred?	Y	N	N/A, no spills have occurred in the last 3 years.
Does the site map contain locations of all storm water monitoring points?	[Y]	N	Only one outfall is noted on map.
Does the site map contain locations of storm water inlets and outfalls, with a unique identification (e.g., 001, 002) for each outfall and if substantially identical?	Y	[N]	Only one outfall for the facility is listed.
Does the site map contain municipal separate storm sewers and where the facility discharges to them?	Y	N	n/a
Does the site map contain locations and descriptions of all non-storm water discharges?	Y	N	n/a

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
Does the site map contain locations of the following activities where these activities are exposed to precipitation? • Fueling stations • Vehicle and equipment maintenance and/or cleaning areas • Loading/unloading areas • Locations used for the treatment, storage or disposal of wastes • Liquid storage tanks • Processing and storage areas • Immediate access roads and rail lines used or travelled by carriers of raw materials, manufactured products, waste materials, or by-products used or created by the facility • Transfer areas for substances in bulk • Machinery	Y	N	
Does the site map contain locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants?	Y	N	n/a
Does the SWPPP document areas at the facility where industrial materials or activities are exposed to storm water and from which allowable non-storm water discharges are released?	Y	N	
Does the SWPPP include a list of the industrial activities exposed to storm water (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams)?	Y	N	
Does the SWPPP include a list of pollutants and/or pollutant constituents associated with each identified activity?	Y	N	
Does the SWPPP include documentation of where spills and leaks occurred for three years prior to the preparation of the SWPPP?	Y	N	SWPPP describes no spill having occurred in the last 3 years.

NPDES Industrial Storm Water Checklist (MSGP)

Site Description			Notes:
Does the SWPPP include a non-storm water discharge evaluation in the SWPPP? Does it include: • Date • Description of evaluation criteria • List of the outfalls or onsite drainage points directly observed • Different types of non-storm water discharges and source locations • Actions taken such as a list of control measures for elimination.	[Y]	N	
Does salt storage occur at this facility?	Y	[N]	
Does the SWPPP include a summary of storm water sampling data for the previous permit term?	Y	[N]	First MSGP permit the facility has.

Controls to Reduce Pollutants			Notes:
Does the SWPPP include documentation of the location and type of control measures at the facility to comply with the requirements in Part 2?	[Y]	N	
Does the SWPPP include documentation that selection and design of control measures were based on a consideration of the practices and procedures in Part 2.1.1?	[Y]	N	
Does the SWPPP include measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings?	[Y]	N	
Does the SWPPP include good housekeeping measures (e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)?	[Y]	N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP include a schedule for pickup and disposal of wastes and routine inspections of tanks and drums?	Y	N	
Does the SWPPP include preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line?	Y	N	
Does the SWPPP include a schedule for preventative maintenance procedures?	Y	N	
Does the SWPPP include procedures for minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur?	Y	N	
Does the facility implement procedures for plainly labeling containers (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides,” etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur?	Y	N	
Does the facility implement preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling?	Y	N	
Does the facility implement procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases?	Y	N	
Does the facility train employees who may cause, detect, or respond to a spill or leak in these procedures and have necessary spill response equipment available?	Y	N	
Does the facility document and follow procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies?	Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Controls to Reduce Pollutants			Notes:
Does the SWPPP document erosion and sediment controls?	Y	N	
Does the facility stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants?	Y	N	
Does the facility place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion and/or settle out pollutants?	Y	N	N/A, rainfall is noted as flowing inward except at outfall 001.
If the facility stores salt at this facility, are the piles enclosed or covered? Does the facility implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile?	Y	N	n/a
Employee Training – is there a schedule for regular (at least annually) employee training?	Y	N	No stormwater training documented.
Does training cover both the specific control measures used to achieve the effluent limits in Part 2 and monitoring, inspection, planning, reporting, and documentation requirements in other parts of the permit?	Y	N	
Does the facility ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged?	Y	N	
Does the facility minimize generation of dust and off-site tracking of raw, final, or waste materials?	Y	N	
Has the facility eliminated non-storm water discharges not authorized by an NPDES permit?	Y	N	

Notes on SWPPP Review

Site Description:

The Wastewater Treatment Plant consists of headworks (pumps, bar screen), an aerated grit chamber, an oxidation ditch, two circular secondary clarifiers, chlorine disinfection, sludge pumps, two sludge vacuum beds, five sludge drying beds to the south, nine sludge drying beds to the west, five sludge cake/compost storage beds to the north, one emergency overflow storage pond, and composting.

Inflows from the City of Truth or Consequences are collected prior to the headworks. After the headworks the flow goes through the grit chamber and into the oxidation ditch. Grit pumps and a grit dewatering system remove grit from the grit chamber. A weir/splitter box at the edge of the oxidation ditch connects the oxidation oval to a clarifier splitter box via a 14" PVC pipe. The clarifier splitter box connects to two circular clarifiers via two 10" pipes. The flow from both clarifiers goes to the chlorine contact chamber. Once the flow has been disinfected, the effluent is discharge to the Rio Grande or to the following discharge sites: Armijo Pond, Armijo Ballfields, and T or C Golf Course.

The sludge from both clarifiers is pumped to two sludge vacuum beds. After dewatering, the sludge cake is transferred (with front-end loader & truck) to the north sludge/compost beds for further composting or landfill disposal. Sludge/scum from the top of the oxidation ditch is periodically sent to the south sludge drying beds. After drying, the sludge/scum is transferred (via front-end loader & truck) to the west sludge beds for further composting or landfill disposal.

The facility site area is approximately 6.1 gross acres.

NPDES Industrial Storm Water Checklist (MSGP)

Inspections (Part 4)			
General			**Notes:**
Routine Facility Inspections			
Are routine facility inspections conducted at least quarterly while facility operating?	Y	N	
Are inspections documented, including: • Date and time • Name and signature of inspector • Weather information and a description of discharge occurring at the time of the inspection • Previously unidentified discharges from site • Control measures needing maintenance or repairs • Failed control measures that need replacement • Incidents of noncompliance observed • Additional control measures needed.	Y	N	
Exceptions, including (see 3.1.1): • Inactive and unstaffed sites	Y	N	n/a
Quarterly Visual Assessment			.
Are quarterly visual assessments conducted?	Y	N	
Does the assessment consist of a sample collected: • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge • Collected in a clean, clear glass or plastic container.	Y	N	

Inspections			
Are assessments documented, including: • Sample location • Sample collection date/time & visual assessment date/time • Personnel collecting sample & performing assessment and their signature • Nature of the discharge (runoff or snowmelt) • Results of observations (including color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen and other obvious indicators) • Probable sources of contamination • If applicable, reason for not taking samples within 1st 30 minutes.	Y	N	
Exceptions, including (see 3.2.3): • Adverse weather conditions • Climates with irregular storm water runoff • Areas subject to snow • Substantially identical outfalls (per 5.2.5.3) • Inactive and unstaffed sites.	Y	N	

Monitoring (Part 6)			
General			**Notes:**
Does the SWPPP contain a procedure for conducting sector (and co-located) specific benchmark monitoring?	Y	N	
Does the SWPPP contain procedures for conducting effluent limitations guidelines monitoring?	Y	N	
Does the SWPPP contain a procedure for other monitoring (state or tribal specific; impaired waters; other as required)	Y	N	
Are samples analyzed in accordance with 40 CFR Part 136 methods?	Y	N	No samples have been taken.
Benchmark Monitoring			
Does the monitoring consist of a sample collected: • Within the first 30 minutes of discharge • On discharges that occur at least 72 hours (3 days) from the previous discharge	Y	N	No benchmark monitoring required for sector T.

NPDES Industrial Storm Water Checklist (MSGP)

• Document the date and duration (in hours) of the rainfall event, rainfall total (snow - date only) for that rainfall • Prior to commingling.			
Is monitoring conducted during each of the first four full quarterly (calendar) monitoring periods following permit coverage?	Y	N	No samples taken.
Is the average of the first four quarterly samples < the parameter benchmark?	Y	N	
Is the average of the first four quarterly samples > the parameter benchmark? • Make the necessary modifications • Continue quarterly monitoring • Determine and document that no further pollutant reductions are technologically available and economically practicable and achievable, continue monitoring once per year, notify EPA • Natural background pollutant level documentation	Y	N	
Exceptions, including (see 6.1.5, 6.1.6 & 6.2.1.3): • Adverse weather conditions • Climates with irregular storm water runoff • Snowmelt • Substantially identical outfalls (per 5.1.5.2) • Inactive and unstaffed sites.	Y	N	
Effluent Limitations Monitoring (Sector A, C, D, E, J, K, L, O, S)			n/a
Sampled once per year?	Y	N	n/a
Follow-up requirements if discharge exceeds effluent limit (see 6.2.2.3)?	Y	N	n/a
Water Quality Based Effluent Limitations			Notes:
Does the facility discharge to water quality impaired waters?	Y	N	Dissolved oxygen.
If TMDL exists, does the facility need to monitor?	Y	N	No TMDL.
Is the facility monitoring all 303(d) pollutants in the first surface water to which they discharge?	Y	N	
Does the facility discharge to a CERCLA site?	Y	N	
Additional monitoring required by EPA?	Y	N	

NPDES Industrial Storm Water Checklist (MSGP)

Reporting (Part 7) Information must be submitted using NeT for NOI, NEC, NOT and Annual Report.			DMRs must be submitted using NetDMR
General			**Notes:**
Is facility a new discharger or new source to water quality impaired waters? Has the facility submitted this information to EPA Region 6?	Y	N	n/a
If there was a facility exceedance under numeric effluent limitations, was a report submitted to EPA within 30 days?	Y	N	No samples taken.
Did the facility submit benchmark or ELG monitoring through NetDMR?	Y	N	No sampling completed.
Did the facility submit Annual Reports to EPA through NeT? (Due January 30 of each year)	Y	N	
If follow up monitoring per 6.2.2.3 exceeds a numeric limit, did the facility submit an Exceedance Report (paper) to EPA Region 6 in addition to reporting the monitoring data through NetDMR?	Y	N	n/a

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Measures to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff	*(e.g., use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away; locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems; clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants; use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible; use spill/overflow protection equipment; drain fluids from equipment and vehicles prior to on-site storage or disposal; perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and ensure that all washwater drains to a proper collection system*) Stormwater appears to flow inward to collection drains.
Good Housekeeping	*(e.g., keeping all exposed areas that are potential sources of pollutants clean, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers)* Yes
Preventative maintenance	*(e.g., regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, and back-up practices should a runoff event occur while a control measure is off-line)* Yes

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Spill Prevention and Response	*(e.g., minimizing the potential for leaks, spills and other releases that may be exposed to storm water and develop plans for effective response to such spills if or when they occur)* Yes
Erosion and Sediment Controls	*(e.g., stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, flow velocity dissipation devices at discharge locations and within outfall channels)* Area is mostly paved, a berm is in place to direct runoff to contained areas.
Management of Runoff	*(e.g., divert, infiltrate, reuse, contain, or otherwise reduce storm water runoff, to minimize pollutants in discharges)* Yes
Salt Storage Piles	*(e.g., enclose or cover piles appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile)* n/a

NPDES Industrial Storm Water Checklist (MSGP)

SWPPP Implementation	
Waste, Garbage and Floatable Debris	*(e.g., keep exposed areas free of such materials or by intercepting them before they are discharged)* Facility is kept clean and ordered.
Evidence of non-storm water discharges	No
Dust Generation and Vehicle Tracking of Industrial Materials	*(minimize generation of dust and off-site tracking of raw, final, or waste materials)* Most of the site is paved.

NPDES Industrial Storm Water Checklist (MSGP)

Notes on SWPPP Implementation and Sector Specific Requirements

List and describe structural controls *(The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications)*

The facility uses site grading, drainage ditches, and berms to control storm water from leaving the 2.54 acre site.


Outfall 001
Rio Grande
Rio Grande
Rio Grande
Google