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NEW MEXICO ENVIRONMENT DEPARTMENT

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BUTCH TONGATE
Cabinet Secretary
J.C. BORREGO
Acting Deputy Secretary

Certified Mail - Return Receipt Requested

September 20, 2016

Mr. James Alarid, PE
Deputy Utility Director
Department of Public Works
1000 Central Avenue; Suite 130
Los Alamos, New Mexico 87544

Re: Los Alamos County Wastewater Treatment Plant (WWTP); Multi-Sector General Permit (MSGP); Compliance Evaluation Inspection (CEI); SIC 4952; NPDES Permit NMU001922; September 14, 2016

Dear Mr. Alarid:

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

Sarah Holcomb
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.

Sincerely,

/s/ Sarah Holcomb

Sarah Holcomb
Acting Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: David Long, USEPA (6EN-WM) by email
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
Robert Houston, (6EN-WS) by e-mail
NMED District II by email



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 U 0 0 1 9 2 2 11 12 1 6 0 9 1 4 17 18 C 19 S 20 2																	
S E C T O R T T R E A T M E N T W O R K S																	
Inspection Work Days				Facility Evaluation Rating				BI	QA	Reserved							
67			1	69	70	2	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) Los Alamos County Department of Public Utilities Los Alamos County (Bayo) WWTP 285 South, West on 502, Just past Los Alamos Exit sign, turn right follow to WWTP LOS ALAMOS COUNTY	Entry Time /Date	Permit Effective Date
	1105 Hours / September 14, 2016	June 4, 2015
	Exit Time/Date	Permit Expiration Date
	1420 Hours / September 14, 2016	June 4, 2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Jeff Ayers		Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. James Alarid, Deputy Utility Manager / (505) 663-3420 / james.alarid@lacnm.us 1000 Central Avenue; Suite 130 Los Alamos, NM 87544		SIC: 4952
		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

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
S	Records/Reports	S	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		Other:

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

Los Alamos County WWTP does not have permit coverage under the 2015 MSGP. They were previously covered under the 2008-2013 MSGP. Personnel changes during the interim caused a lapse in knowledge and compliance with the 2015 MSGP.

Mr. James Alarid suggested to the inspectors that compliance with the 2015 MSGP would be forthcoming with submittal of an eNOI along with updating their SWPPP and ESA status.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sandra Gabaldon /s/ Sandra Gabaldon	NMED/SWQB/(505) 827-1041/(505) 827-0160	September 20, 2016
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
/s/ Jennifer Foote Jennifer Foote, Municipal Team Lead	NMED/SWQB/(505) 827-0596/(505) 827-0160	September 20, 2016

**Los Alamos County (Bayo)
Wastewater Treatment Plant
NPDES Compliance Evaluation Inspection
Multi-Sector General Permit (MSGP)
NPDES Permit No.: NMU001922
Inspection Date: September 14, 2016**

Introduction:

On September 14, 2016, a Compliance Evaluation Inspection (CEI) was conducted at Los Alamos Wastewater Treatment Plant (WWTP), County of Los Alamos, Los Alamos, New Mexico by Sandra Gabaldón and Daniel Valenta, of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). The purpose of this inspection is to document the facility's status regarding the National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges associated with industrial activities under 40 CFR 122.26 and the industrial stormwater Multi-Sector General Permit (MSGP, 2015). Los Alamos WWTP is classified as Treatment Works (see Standard Industrial Classification [SIC] code 4952) that meets the description in Sector T of the MSGP.

Upon arrival at 1105 hours on September 14, 2016, the inspectors met with Mr. Jeff Ayers, WWTP Superintendent, and Ms. Jennifer Baca, WWTP Supervisor. Ms. Gabaldón presented her credentials, and explained the purpose of the inspection. The inspectors then met with Mr. Katlyn Mahoney, Compliance Officer, and Mr. James Alarid, Deputy Utility Manager after discussion with Mr. Ayers and Ms. Baca revealed the WWTP did not have coverage under the 2015 MSGP.

This report is based on review of EPA's on-line notice of intent (NOI) database and on-site observation by NMED personnel along with verbal information provided by the Public Utilities Staff.

Clean Water Act (CWA) and Industrial Stormwater Permit Requirements:

Section 301(a) of the Federal Water Pollution Control Act states that "*Except as in compliance with this section and sections 302, 306, 307, 318, 402 and 404 of this ACT, the discharge of any pollutant by any person shall be unlawful.*" Federal regulations in 40 CFR part 122.21(a) Duty to Apply, states: "*Any person who discharges or proposes to discharge pollutants...must submit a complete application to the Director in accordance with this section and part 124 of this chapter.*"

USEPA's MSGP was re-issued on June 4, 2015. This replaced the 2008 MSGP which expired on September 29, 2013. Common requirements for coverage under an industrial stormwater permit include the development of a written stormwater pollution prevention plan (SWPPP), implementation of control measures, and submittal of a request for permit coverage, referred to as the Electronic Notice of Intent (eNOI). The SWPPP is a written assessment of potential sources of pollutants in stormwater runoff and control measures that will be implemented at your facility to minimize the discharge of these pollutants in runoff from the site.

The MSGP also requires visual and routine inspections to determine the effectiveness of BMPs on site. For further information regarding the NPDES MSGP please visit EPA's website: <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities#overview>. Once you navigate to the MSGP on the website, you will also find various Fact Sheets for industrial activities. Treatment Works fall under Sector T of the MSGP.

There are a number of factors that influence to what extent automobile salvage yards can affect water quality. Some of these factors include: geographic location, topography, hydrogeology, extent of impervious surfaces, type of ground cover, outdoor activities, the size of your facility, and the type and duration of precipitation events.

Common activities, pollutant sources and associated pollutants that may be found at a facility such as this include:

Activity	Pollutant Source	Pollutant
Preparation of chemical, biological and physical treatment processes	Spills and leaks of process chemicals and materials	Disinfectants, polymers and coagulants, alum, ferric chloride, soda ash, lime, sodium aluminate, sodium hypochlorite, caustic soda, chlorine, sodium bisulfite.
Soil amending and grass fertilizing	Over fertilizing	Commercial brands of balance fertilizers (6-6-6, 8-8-8 or 12-12-12), commercial sludge based products, nitrogen, other nutrients, phosphorous, ammonia. Aluminum sulfate, liquid chlorine, liquid polymer, fuel, oil.
Liquid storage in above ground storage	External corrosion and structural failure	Aluminum sulfate, liquid chlorine, bisulfite, liquid polymer, fuel, oil.
	Installation problems	
	Spills and overfills due to operator error	
	Failure of piping systems (pipes, pumps, flanges, couplings, hoses, and valves)	
	Leaks or spills during pumping of liquids from barges, trucks, or rail cars to a storage facility	
Pest control	Large quantities of pesticide application, pesticide storage	Diazanone, malathion, amdro, dimethylphthalate, diethyl phthalate, dichlorvos, carbaryl, skeetal, batex, liquid copper
Sludge drying beds	Sludge	Nitrate, TDS, TSS, ammonia, fecal pathogens.
Sludge storage piles	Sludge	Nitrate, TDS, TSS, ammonia, fecal pathogens.
Sludge transfer	Sludge, vehicles, transfer equipment	Nitrate, TDS, TSS, oil, fuel, hydraulic fluids, ammonia, fecal pathogens
Septage transfer	Solid and liquid sanitary waste, vehicles	Nitrate, TDS, TSS, oil, fuel, hydraulic fluids, ammonia, fecal pathogens
Incineration	Ash impoundments/piles	Heavy metals, TDS, TSS
Equipment/vehicle maintenance and storage	Spills and leaks of lubricants and coolants	solvents, acids, oil, grease, arsenic, lead, cadmium, chromium, chemical oxygen demand (COD), and benzene
Miscellaneous	Grit and scum piles from clarifiers, screens, exposed soil	TSS, heavy metals, fecal coliform, nitrate

Findings:

Your facility had NO coverage under the 2015 MSGP. You are encouraged to review the permit, update your ESA status as well as your SWPPP and apply for coverage under the eNOI system.