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*Surface Water Quality Bureau*

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Director  
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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 20, 2012

Mr. Dan Campbell  
General Manager, Raton Water Works  
P.O. Box 99  
Raton, New Mexico 87740

**Re: Minor Municipal, SIC 4952, NPDES Compliance Evaluation Inspection, Raton Wastewater Treatment Plant, NM0020273, August 6, 2012**

Dear Mr. Campbell,

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.

Findings are based on the inspector's observances in regards to specific requirements of the NPDES permit. The Raton WWTP received an overall evaluation rating of "4" on a scale of 1 to 5. The main problems were found in the area of Flow Measurement and Laboratory. Please refer to the Further Explanations section of the report for more detail.

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 USEPA (Diana McDonald, USEPA (6EN-WT), 1445 Ross Ave, Dallas, Texas, 75202) and NMED (at above address) regarding modifications and compliance schedules.

I wish to thank you for the cooperation extended to the NMED while at the Raton Wastewater Treatment Plant. If you have any questions about this inspection report, please contact me at (505) 222-9587 or [sarah.holcomb@state.nm.us](mailto:sarah.holcomb@state.nm.us).

Sincerely,  
*/s/ Sarah Holcomb*  
Sarah Holcomb  
Environmental Scientist/Specialist  
Surface Water Quality Bureau

Cc: Rashida Bowlin, USEPA (6EN-AS), by email  
Bob Italiano, NMED District II Manager, by email  
Carol Peters-Wagnon, USEPA (6EN-AS), by email

Larry Giglio, USEPA (6EN-P), by email  
Hannah Branning, USEPA (6EN-AS), by email  
Diana McDonald, USEPA (6EN-AS), by email

Darlene Whitten-Hill, USEPA (6EN-AS), by email



## SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS  
DETAILS:

S  M  U  NA (FURTHER EXPLANATION ATTACHED NO)

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.  
DETAILS:

S  M  U  NA (FURTHER EXPLANATION ATTACHED YES)

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.  
DETAILS:

S  M  U  NA (FURTHER EXPLANATION ATTACHED NO)

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 YES)  
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  Y  N  NA  
 TYPE OF DEVICE 9-inch Parshall flume

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.  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 YES)  
 DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)  Y  N  NA

RATON WWTP

PERMIT NO: NM0020273

**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. 100 % 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 SEACREST GROUP AMERICAN INTERPLEX  
 LAB ADDRESS 1341 CANNON ST. LOUISVILLE, CO, 80027-1455 8600 KANIS RD. LITTLE ROCK, AR 72204-2322  
 PARAMETERS PERFORMED WHOLE EFFLUENT TOXICITY NITROGEN, PHOSPHORUS

**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 The facility was not discharging at the time of this inspection.

**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: INJECTED (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

**SECTION I - SAMPLING INSPECTION PROCEDURES** (FURTHER EXPLANATION ATTACHED NO ).

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

## **Introduction**

On August 6, 2012, Sarah Holcomb of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Raton Wastewater Treatment Plant (WWTP). The Raton WWTP has a design flow capacity of 0.9 MGD (million gallons per day) 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 NM0020273. This permit regulates the WWTP discharge to Doggett Creek, an unclassified tributary of the Canadian River Basin in Segment 20.6.4.98 according to the *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 NMAC*. This segment includes the designated uses of livestock watering, wildlife habitat, limited aquatic life, 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 representatives, observations made by the NMED inspector, and records and reports kept by the permittee and/or NMED.

Upon arrival at the WWTP at 1250 hours on August 6, 2012, the inspector conducted an entrance interview with Mr. Nick Aragon, Wastewater Superintendent, where she presented credentials and explained the purpose of the inspection. Mr. Aragon conducted a tour of the facility, including the laboratory and records kept onsite. An exit interview was conducted with Mr. Aragon at the facility at approximately 1435-1445 on August 6, 2012 to present the preliminary findings of the inspection.

## **Treatment Scheme**

The Raton Wastewater Treatment Plant (WWTP) consists of the headworks including a screw pump/auger and grit removal, SBR basins and UV disinfection, as well as a reuse system to irrigate the city's golf course. A splitter box and retention basin are located on site for this purpose, and the effluent is chlorinated in the line on the way out to the golf course.

Influent enters the headworks through a 9" Parshall flume. Grit and solids removal takes place after entry into the system, and the grit and rags from the influent are collected in a container which is later disposed in a landfill.

The flow then enters a splitter box where it is evenly divided between two basins of the Sequencing Batch Reactor (SBR). These two units run in parallel. The water enters equalization chambers after leaving the splitter box. This gives the operator control of the wastewater levels in the reactor basins. In the first phase, the water fills the reactor chambers. The water entering the chambers mixes with the biomass that has settled from the last treatment phase. Once the chambers are full, in the second phase, air is added to the mixture through fine bubble diffusers to facilitate biological growth and waste reduction/treatment of the wastewater. In the third phase, the air is turned off and the treated wastewater is allowed to settle. In the decant phase, the now clarified effluent is discharged from this part of the plant. The total cycle run time is 289 minutes and this cycle runs 5 times per day.

The effluent is then sent through a Sunlight Systems UV treatment system. This is an enclosed UV system where the bulbs are fixed and are periodically cleaned, manually, with an internal scrubber, which is part of the unit. This system is housed below ground and has been enclosed within a building to protect it from the elements.

After disinfection by UV, the water proceeds to the outfall. It is measured by a 6" Parshall flume and totalizer meter.

## **Solids Management**

Waste sludge from the SBR basins is decanted during an idle phase, if needed, and directed to a holding basin on site. This was one of the former aeration basins from the old plant footprint. Sludge is then injected at an adjacent plot of land.

### **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 B – Recordkeeping and Reporting Evaluation – Overall rating of Satisfactory**

The permit requires in Part I. Section C.c:

*Reporting periods shall end on the last day of the months March, June, September, and December.*

And, the permit requires in Part III.C.2, Representative Sampling:

*Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.*

#### **Findings** for Recordkeeping and Reporting:

Facility staff has been submitting DMRs to EPA and NMED on a non-traditional quarterly basis. For example, the first quarter of the year 2012 would include the months of December 2011-February 2012. Facility representatives indicated that EPA had given them prior guidance to submit DMRs using these different calendar quarters, however, this is in conflict with the permit, which states that the monitoring periods end on a normal calendar year quarterly basis (in March, June, September and December).

The implementation of NetDMR was discussed with the permittee's representative, who indicated that they have yet to take the NetDMR training. The inspector gave the permittee's representative information on when the next training webinars were occurring.

### **Section E – Flow Measurement Evaluation – Overall rating of Marginal**

The permit requires, in Part III.C.6, Flow Measurements:

*Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge values.*

#### **Findings** for Flow Measurement:

The flow meters were last internally or professionally calibrated at this facility on April 26, 2011. EPA's recommendation has always been to have flow measurement devices professionally calibrated about once per year by a third party/outside representative. The facility representatives indicated during this inspection that it was difficult to schedule a flow calibration expert to come in when Raton would be the only facility they would have as a client in the area.

EPA also recommends that facilities conduct flow measurement checks to ensure that the devices are staying within the required 10% of actual flow in between professional calibrations. The facility staff has not conducted interim flow checks since 2011.

### **Section F - Permit Requirements** for Laboratory – overall rating of Marginal

The permit states in Part III.C.5.a:

*Monitoring must be conducted according to test procedures approved under 40 CFR 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.*

**Findings** for Laboratory:

In the March 12, 2007 Federal Register, EPA revoked a number of previously approved EPA methodologies for testing wastewater. Two of those methods, EPA Method 150.1 (for pH) and EPA Method 160.2 (for TSS) were revoked in favor of the Standard Methods versions, 4500-H+ B (for pH) and 2540 D (for TSS). The old EPA method allowed facilities to “shake and pour” the effluent into the filtration funnel, and the approved method now only allows pipetting the effluent into the filtration funnel.

During the review of Raton’s laboratory, the inspector discovered that the lab was still running the unapproved EPA version of the TSS method. Facility staff indicated that pipetting a large amount of effluent is not accurate. Lab staff measured the Class A 25ml pipette into a Class A graduated cylinder, and found that the measurement from the pipette was about 0.2ml below what it should have been.

The facility’s procedure is to mix the effluent sample, pour it into the filters, and conduct a thorough rinse of the container and also pour that rinsate into the filter to ensure that all of the possible solids are collected for evaluation. This method correlates with the old EPA method.

### Discharge Monitoring Report Calculation Check

The DMR calculation check was conducted for Biochemical Oxygen Demand (BOD), and Total Suspended Solids (TSS) for the months of January and May 2012.

Concentration values are in mg/L. Loading values are in pounds per day. The permit requires a three-hour composite sample once per week for BOD and TSS.

#### BOD January 2012

<u>DATE</u>	<u>CONCENTRATION</u>	<u>CONV FACTOR</u>	<u>FLOW, MGD</u>	<u>LOADING</u>
1-4-12	2.9 mg/L	x 8.34	x 0.58 =	14.03
1-11-12	3.2 mg/L	x 8.34	x 0.59 =	15.75
1-18-12	3.7 mg/L	x 8.34	x 0.51 =	15.74
1-25-12	5.3 mg/L	x 8.34	x 0.56 =	24.75

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TOTAL: 15.1 mg/L 70.27

Loading:

January's 30 day average =  $70.27 / 4 = 17.57$  lbs/day (reported 19.1 lbs/day)

January's 7 day average = 24.75 lbs/day (reported 24.5 lbs/day)

Concentration:

January's 30 day average =  $15.1 \text{ mg/L} / 4 = 3.78$  mg/L (reported 4.1 mg/L)

January's 7 day average = 5.3 mg/L (reported 5.3 mg/L)

#### TSS January 2012

<u>DATE</u>	<u>CONCENTRATION</u>	<u>CONV FACTOR</u>	<u>FLOW, MGD</u>	<u>LOADING</u>
1-4-12	4.4 mg/L	x 8.34	x 0.58 =	21.28
1-11-12	9.4 mg/L	x 8.34	x 0.59 =	46.25
1-18-12	2.4 mg/L	x 8.34	x 0.51 =	10.21
1-25-12	6.9 mg/L	x 8.34	x 0.56 =	32.23

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TOTAL: 23.1 mg/L 109.97

Loading:

January's 30 day average:  $109.97 / 4 = 27.49$  lbs/day (reported 27.5 lbs/day)

January's 7 day average: 46.25 lbs/day (reported 46.5 lbs/day)

Concentration:

January's 30 day average =  $23.1 \text{ mg/L} / 4 = 5.78$  mg/L (reported 5.8 mg/L)

January's 7 day average = 9.4 mg/L (reported 9.4 mg/L)

### BOD May 2012

<u>DATE</u>	<u>CONCENTRATION</u>	<u>CONV FACTOR</u>	<u>FLOW, MGD</u>	<u>LOADING</u>
5-2-12	3.7 mg/L	x 8.34 x	0.45 =	13.89
5-9-12	3.2 mg/L	x 8.34 x	0.30 =	8.01
5-16-12	3.6 mg/L	x 8.34 x	0.47 =	14.11
5-23-12	2.7 mg/L	x 8.34 x	0.40 =	9.01
5-30-12	2.8 mg/L	x 8.34 x	0.16 =	3.74
<b>TOTAL:</b>				<b>48.76</b>

Loading:

May's 30 day average =  $48.76 / 5 = 9.75$  lbs/day (reported 11.2 lbs/day)

May's 7 day average = 14.11 lbs/day (reported 14.2 lbs/day)

Concentration:

May's 30 day average =  $16.0 \text{ mg/L} / 4 = 4.0$  mg/L (reported 3.3 mg/L)

May's 7 day average = 3.7 mg/L (reported 3.7 mg/L)

### TSS May 2012

<u>DATE</u>	<u>CONCENTRATION</u>	<u>CONV FACTOR</u>	<u>FLOW, MGD</u>	<u>LOADING</u>
5-2-12	3.9 mg/L	x 8.34 x	0.45 =	14.64
5-9-12	3.5 mg/L	x 8.34 x	0.30 =	8.76
5-16-12	4.6 mg/L	x 8.34 x	0.47 =	18.03
5-23-12	3.4 mg/L	x 8.34 x	0.40 =	11.34
5-30-12	3.7 mg/L	x 8.34 x	0.16 =	4.94
<b>TOTAL:</b>				<b>57.71</b>

Loading:

May's 30 day average =  $57.71 / 5 = 11.54$  lbs/day (reported 13.2 lbs/day)

May's 7 day average = 18.03 lbs/day (reported 18.1 lbs/day)

Concentration:

May's 30 day average =  $19.1 \text{ mg/L} / 5 = 3.82$  mg/L (reported 3.9 mg/L)

May's 7 day average = 4.6 mg/L (reported 4.6 mg/L)

NMED/SWQB

**Official Photograph Log**

Photo # 1

Photographer: Sarah Holcomb	Date: 8-6-2012	Time: 1342 hours
City/County: Raton/Colfax County		
Location: Raton Wastewater Treatment Plant		
Subject: Outfall from the WWTP; no discharge at the time of this inspection.		



