



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

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DAVE MARTIN
Secretary

RAJ SOLOMON, P.E.
Deputy Secretary

Certified Mail – Return Receipt Requested

July 21, 2011

Mr. Larry Fry, City Manager
City of Roswell
Post Office Drawer 1838
Roswell, NM 88201

RE: Major Municipal; SIC 4952; NPDES Compliance Evaluation Inspection; Roswell Wastewater Treatment Plant; NPDES Permit No. NM0020311; July 7, 2011

Dear Mr. Fry:

Enclosed, please find a copy of the report and checklist 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.

Introduction and treatment scheme are discussed in the Further Explanations section of the inspection 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. Further, you are encouraged to notify in writing, both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Diana McDonald
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Suite 1200
1445 Ross Avenue
Dallas, Texas 75202-2733

Program Manager
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 me at (505) 827-1041 or sandra.gabaldon@state.nm.us

Sincerely,

Sandra Gabaldón
Surface Water Quality Bureau

Cc: Marcia Gail Adams, EPA, Enforcement Section (6EN-AS) by e-mail
Larry Giglio, EPA (6EN-P) by e-mail
Carol Peters-Wagnon, EPA (6EN-WM) by e-mail
Diana McDonald, EPA (6EN-WM) by e-mail
Samual Tates, EPA, (6W-AS) by e-mail
NMED District III by e-mail



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	2	0	3	1	1	11	12	1	1	0	7	0	7	17	18	C	19	S	20	1	
Remarks																													
M A J O R M U N I C I P A L																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved													
67	0	0	1	69	70	3	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) ROSWELL WWTP – 285 South (Main Street), East on College Boulevard, Follow to end of road to WWTP.		Entry Time /Date 0810 hours / 07-07-2011	Permit Effective Date December 1, 2006
CHAVES COUNTY		Exit Time/Date 1100 hours / 07-07-2011	Permit Expiration Date November 30, 2011
		Other Facility Data GPS: N. 33.40829° W. – 104.47920° SIC: 4952 Activity code: TW	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Arthur Torrez, Water and Wastewater Manager (575) 622-1449 Daniel Mendiola, Wastewater Operator III		Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Larry Fry, City Manager (575) 637-6240 Post Office Box Drawer 1838 Roswell, NM 88201			

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	S	Compliance Schedules	S	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	M	Laboratory	N	Storm Water	N	Other:

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

- See attached checklist and further explanation report.

Name(s) and Signature(s) of Inspector(s) SANDRA GABALDON	Agency/Office/Telephone/Fax NMED/SWQB (505) 827-1041	Date JULY 21, 2011
Signature of Management QA Reviewer Richard Powell	Agency/Office/Phone and Fax Numbers NMED / SURFACE WATER QUALITY BUREAU (505) 827-2798	Date JULY 21, 2011

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 NO)

- 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. **GENERATOR ONSITE, CHECKED WEEKLY** S M U NA
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. **DIAL OUT ALARM SYSTEM** 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. **THE TREATMENT PLANT RECENTLY UNDERWENT RENOVATION AND THE CONTRACTOR STILL HOLDS ALL OPERATION AND MAINTENANCE RECORDS UNTIL IT IS COMPLETED. WWTP IS AWARE OF O&M REQUIREMENTS.** 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. **24-HOUR FLOW WEIGHTED SAMPLES DONE.** 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. **REFRIGERATED AUTOMATIC SAMPLER USED** 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: **PERMITTEE IS CURRENTLY NOT DISCHARGING. LAST DISCHARGE WAS IN FEBRUARY 2011.**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE **18-INCH PARSHALL FLUME WITH STAFF GAUGE**

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. - **FLOW IS MEASURED WHEN DISCHARGE IS OCCURRING** Y N NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. - **ULTRASONIC TOTALIZER** Y N NA

4. CALIBRATION FREQUENCY ADEQUATE. - **CALIBRATION PERFORMED ANNUALLY** Y N NA
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES. Y N NA
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. - **DONE WEEKLY WHEN DISCHARGING.** Y N NA

5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. - **FACILITY IS NOT DISCHARGING AT THIS TIME.** 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 NO).
 DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES) - **pH ANALYSIS IS BEING PERFORMED INCORRECTLY. LAB TECH IS NOT BRACKETING THE EXPECTED pH. LAB TECH WILL REVIEW PROCEDURE TO ENSURE THIS IS CORRECTED.** 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. S M U NA
- 4. QUALITY CONTROL PROCEDURES ADEQUATE. S M U NA
- 5. DUPLICATE SAMPLES ARE ANALYZED. 100 % OF THE TIME - **WHEN DISCHARGING**. Y N NA
- 6. SPIKED SAMPLES ARE ANALYZED. 10 % OF THE TIME - **WHEN DISCHARGING** Y N NA
- 7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME WILKINS ENVIRONMENTAL
 LAB ADDRESS 832NW 67TH STREET; OKLAHOMA CITY, OK 73116
 PARAMETERS PERFORMED WHOLE EFFLUENT TOXICITY

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

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: agricultural (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

Roswell Wastewater Treatment Plant
Compliance Evaluation Inspection
NPDES Permit No. NM0020311
July 7, 2011

Further Explanations

Introduction

A compliance evaluation inspection (CEI) was conducted at the Roswell Wastewater Treatment Plant (WWTP) on July 7, 2011, by Sandra Gabaldón of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). The inspection was conducted by NMED for the U.S. Environmental Protection Agency (USEPA), Region 6, under the National Pollutant Discharge Elimination System (NPDES) permit program. The enclosed inspection report is based on verbal information provided by the permittee's representative, Mr. Art Torrez, Wastewater Manager, observations made by the NMED inspector, and a review of records maintained by the permittee and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3 checklist.

The Roswell WWTP is classified as a major municipal discharger with a design flow of 7.0 million gallons a day (MGD) and is assigned NPDES permit number NM0020311. The discharge from the WWTP is into Rio Hondo. Discharges occur during the winter months: December – March. The rest of the year, the effluent is used as reclamation water at area farms and the Roswell Golf Course. The designated uses for this segment, 20.6.4.206, (*Interstate and Intrastate Surface Waters, 20.6.4 NMAC*) include: irrigation, livestock watering, wildlife habitat, secondary contact and warmwater aquatic life.

Ms. Gabaldón arrived at the facility at 0810 hours on July 7, 2011. Ms. Gabaldón presented her credentials and explained the purpose of the inspection. Ms. Gabaldon held the exit conference with Mr. Art Torrez at the facility from approximately 1045 hours to 1100 hours.

Treatment Scheme

There are a total of three lift stations that bring influent from the City of Roswell into the WWTP. Influent enters the plant through a pump station where it goes through a bar screen and a grit chamber. It then enters one of two primary clarifiers, into a splitter box and then flows into aeration basins with fine bubble diffusers. It then flows into the final clarifiers. Disinfection is accomplished with Ultraviolet light. A total of two banks, 96 bulbs are used. Weekly maintenance is performed on the UV system to ensure its proper disinfection of the effluent. There are remnants of the old trickling filter onsite along with the previous chlorine contact chamber, which is no longer used.

Sludge

All sludge generated is composted using the static windrow method. Sludge in the drying bed is allowed to dry to a minimum of 50% solid before windrowing. Temperatures are monitored within the windrows. Regular turning of windrows is performed with a minimum of five turnings to meet the requirements. Fecal coliform densities are also taken to ensure compliance, along with vector attraction reduction requirements.