



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Surface Water Quality Bureau

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KYAN FLYNN
Cabinet Secretary-Designate

BUTCH TONGATE
Deputy Secretary

ERIKA SCHWENDER
Director
Resource Protection Division

Certified Mail - Return Receipt Requested

September 3, 2013

Mr. Doug Powers, City Manager
City of Tucumcari
215 East Center Street
Tucumcari, NM 88401

Re: Wastewater Treatment Plant; Major; Municipal; SIC 4952; Tucumcari WWTP; NPDES Compliance Evaluation Inspection; NPDES NM0020711; August 15, 2013

Dear Mr. Powers:

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.

Introduction, treatment scheme, and problems noted during this inspection 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 advised 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)
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

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

Tucumcari WWTP
September 3, 2013
Page 2

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, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Larry Giglio, USEPA (6WQ-PP) by e-mail
Hannah Branning, USEPA (6EN-WC) by e-mail
Jan Walker, USEPA (6EN) by e-mail
NMED District I, William Chavez 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 2 0 7 1 1 11 12 1 3 0 8 1 5 17 18 C 19 S 20 1 | | | | | |
| Remarks | | | | | |
| W A S T E W A T E R T R E A M E N T P L A N T | | | | | |
| Inspection Work Days | Facility Evaluation Rating | BI | QA | Reserved | |
| 67 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) Tucumcari Wastewater Treatment Plant – North on 1st St., cross over RR tracks, 0.4 miles to Maple St., turn right onto Maple, left onto Rock Island to WWTP. Quay County | Entry Time /Date 1100/August 15, 2013 | Permit Effective Date February 1, 2008 |
| | Exit Time/Date 1520/August 15, 2013 | Permit Expiration Date January 31, 2013 |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Janet Garcia, Laboratory Analyst 575-461-4372 Michael Rivera, Plant Operator Level III WW, 575-461-4542 | Other Facility Data Latitude N 35° 11' 48.90" Longitude W 103°43'04.94" SIC 4952 | |
| Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Doug Powers, 215 East Center St., Tucumcari, NM 88401/ City Manager/ 575-461-3451, fax 575-461-2049 | Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | |

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

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

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

1. SEE REPORT AND FURTHER EXPLANATIONS.

| | | |
|--------------------------------------------------------------------------------------|----------------------------------------------------------------------|--------------------------|
| Name(s) and Signature(s) of Inspector(s) DANIEL VALENTA /s/ Daniel Valenta | Agency/Office/Telephone/Fax NMED/SWQB 505-827-2575 | Date 9/3/2013 |
| Signature of Management QA Reviewer SARAH HOLCOMB /s/Sarah Holcomb | Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2798 | Date 8/29/2013 |

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED *Yes*)

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. 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 (*Yes*)
Equipment out of operation.

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. **Samples should be taken at the same location every time.** 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" 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. (DATE OF LAST CALIBRATION _____) **No Calibration** 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 No)
 DETAILS:

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

City of Tucumcari Wastewater Treatment Plant
NPDES Permit Number NM0020711
August 15, 2013

Introduction

A Compliance Evaluation Inspection (CEI) was conducted at the City of Tucumcari Waste Water Treatment Plant (WWTP) by Mr. Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) on August 15, 2013. 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, in accordance with the Federal Clean Water Act. These inspections are conducted under agreement with USEPA and are used by the USEPA to determine compliance with the NPDES permit program.

The City of Tucumcari WWTP is classified as a major municipal discharger under the Federal Clean Water Act (CWA), section 402 National Pollutant Discharge Elimination System (NPDES) permit program, and is assigned permit number NM0020711. The Standard Industrial Classification Code ((SIC) is 4952. The effluent is conveyed by underground pipe for about 1.5 miles to Breen's pond, overflow from the pond is discharged to an unnamed creek. The unnamed creek is a perennial stream and it travels about one mile to reach Pajarito Creek, a perennial tributary to the Canadian River. This Canadian River Basin is in segment 20.6.4.303 with the designated uses of irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat, and secondary contact.

Treatment Scheme

Within the collection system of the City of Tucumcari, eleven lift stations deliver wastewater to the WWTP. Each lift station has two pumps. Movable pumps are available for back up if the lift stations fail. Alarms are located at four of the eleven lift station and are sounded in the event of an overflow. Two portable generators are available at the WWTP to provide power for the lift station pumps in the event of a power outage.

The Tucumcari WWTP is a new Medium Rate Activated Sludge facility (MRAS). MRAS is a conventional biological nutrient removal activated sludge process. The improvements at the WWTF are extensive and consist of new MRAS Basins, Splitter Boxes, Secondary Clarifiers, rehabilitation of the Primary Clarifiers, Sludge Composting Pad, UV Disinfection, a Laboratory/Administration Building, and a Blower/Pump Building. The MRAS plant has a capacity of 1.2 MGD with an average daily flow of 0.48 MGD. The WWTP is a hybrid plant which incorporates some of the components of the old plant.

At the headwork's is a fine mesh bar screen, an aerated grit chamber with an influent wet-well lift station that houses three 25 hp Flygt submersible pumps that are equipped with variable frequency drives. At the time of the inspection, the automatic bar screen was not operational. Sewage was passing through the manual bar screen only. Sewage then flows through an aerated grit chamber or through a bypass grit chamber. An auger system that removes the grit was not operational at this time.

City of Tucumcari Wastewater Treatment Plant
NPDES Permit Number NM0020711
August 15, 2013

The Grit and screening are collected into hoppers for disposal at the landfill. A 9-inch Parshall flume with an ultrasonic recording instrument follows the grit chambers.

The primary plant components consist of two refurbished primary clarifiers; both are 40 feet in diameter and 9 feet deep. The secondary plant components consist of two MRAS aeration basins and two secondary clarifiers. Disinfection is accomplished by two banks of UV lights. The waste solids are pumped to a primary anaerobic digester (with heating and mixing) and then to a secondary anaerobic digester (with no heating and mixing). Solids from the secondary anaerobic digester go to three concrete sludge beds where they are dried and turned by a Brown bear front end loader.

The EPA is encouraging permittees to transition from submitting paper DMRs to the NetDMR system. Information on the NetDMR training can be found at:
<http://epa.gov/netdmr/about/training.html>

City of Tucumcari Wastewater Treatment Plant
NPDES Permit Number NM0020711
August 15, 2013

Section A – Permit Verification – Overall Rating of “Unsatisfactory”

Permit Requirements For Permit Verification

The Permit requires in Part 3.A.4. DUTY TO REAPPLY

4. If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The application shall be submitted at least 180 days before the expiration date of this permit. The Director may grant permission to submit an application less than 180 days in advance but no later than the permit expiration date. Continuation of expiring permits shall be governed by regulations promulgated at 40 CFR Part 122.6 and any subsequent amendments

Finding for Permit Verification

The City of Tucumcari WWTP has been operating under permit NM0020711 issued February 1, 2008 which expired on January 31, 2013. NMED received an application for permit renewal on February 15, 2013; the application was signed by the City Manager on February 14, 2013. The above requirement does not appear to have been met.

Section B – Record Keeping and Reporting – Overall Rating of “Marginal”

Permit Requirements For Record Keeping and Reporting

The permit requires in Part III. D.1.b. MUNICIPAL PERMITS:

Any change in the facility discharge (including the introduction of any new source or significant discharge or significant changes in the quantity or quality of existing discharges of pollutants) must be reported to the permitting authority. In no case are any new connections, increased flows, or significant changes in influent quality permitted that will cause violation of the effluent limitations specified herein.

Finding for Record Keeping and Reporting

The City has built a lined retention pond next to the WWTP; effluent from the plant is being diverted to this pond for reuse, (see photo 1.). At the present time this diversion is not being metered and subtracted from the discharge submitted on DMR's. The flows reported in the DMR's are not the correct values that should be used when calculating loading requirements. Thus the reported values are higher than what was discharged.

City of Tucumcari Wastewater Treatment Plant
NPDES Permit Number NM0020711
August 15, 2013

Section C - Operation and Maintenance – Overall Rating of “Unsatisfactory”

Permit Requirements For Operation and Maintenance (O&M)

The permit requires in Part III.B.3. PROPER OPERATIONS AND MAINTENANCE:

- a. The permittee shall at all times properly operate and maintain all facilities and systems of the treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*

- b. The permittee shall provide an adequate operation staff which is duly qualified to carry out the operation, maintenance and testing functions required to insure compliance with the conditions of this permit.*

Finding for O& M

- 1) Inadequate operational staff. The facility has lost its Facility Supervisor and is looking for a replacement at this time. At the present time there are only four operators assigned at the facility. There are 11 lift stations at the town that must be checked twice a day. This duty occupies two of the four operators. **This is a repeat finding of the August 30, 2010 inspection and the May 9, 2012 inspection.** It must be stressed to City Management the importance of keeping an adequately trained and skilled staff at the WWTP. The WWTP is a complex system and requires highly trained and skilled Operators to prevent system failures and to protect human health and the environment.

- 2) In the pretreatment portion of the plant there are two pieces of non-operational equipment, the automatic fine mesh bar screen and the cyclone grit removal equipment. These two pieces are an important part of removing debris and inorganics from the influent flow stream. **This is a repeat finding of the August 30, 2010 inspection and the May 9, 2012 inspection.**

- 3) Standard Operating Procedures (SOPs): The facility has undergone a rebuilding phase, merging new processes with the older existing facility. New SOP's should be written to aid in training new operators. Every operator at the WWTP must be informed and familiar with the new SOP's.

City of Tucumcari Wastewater Treatment Plant
NPDES Permit Number NM0020711
August 15, 2013

Section E – Flow Measurement – Overall Rating of “Unsatisfactory”

Permit Requirements For Flow Measurements

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 volumes.

Findings for Flow Measurements

Facility has a nine inch Parshall and Fisher & Porter ultrasonic flow meter at their effluent discharge point which was installed in November 2011. Per facility personnel no calibration checks have been performed at the flume. The staff gage was so worn and cracked at the bottom an accurate reading of the height of flow would be very difficult. **This is a repeat finding of the May 9, 2012 inspection.**

Section G - Effluent and Receiving Water – Overall Rating of “Marginal”

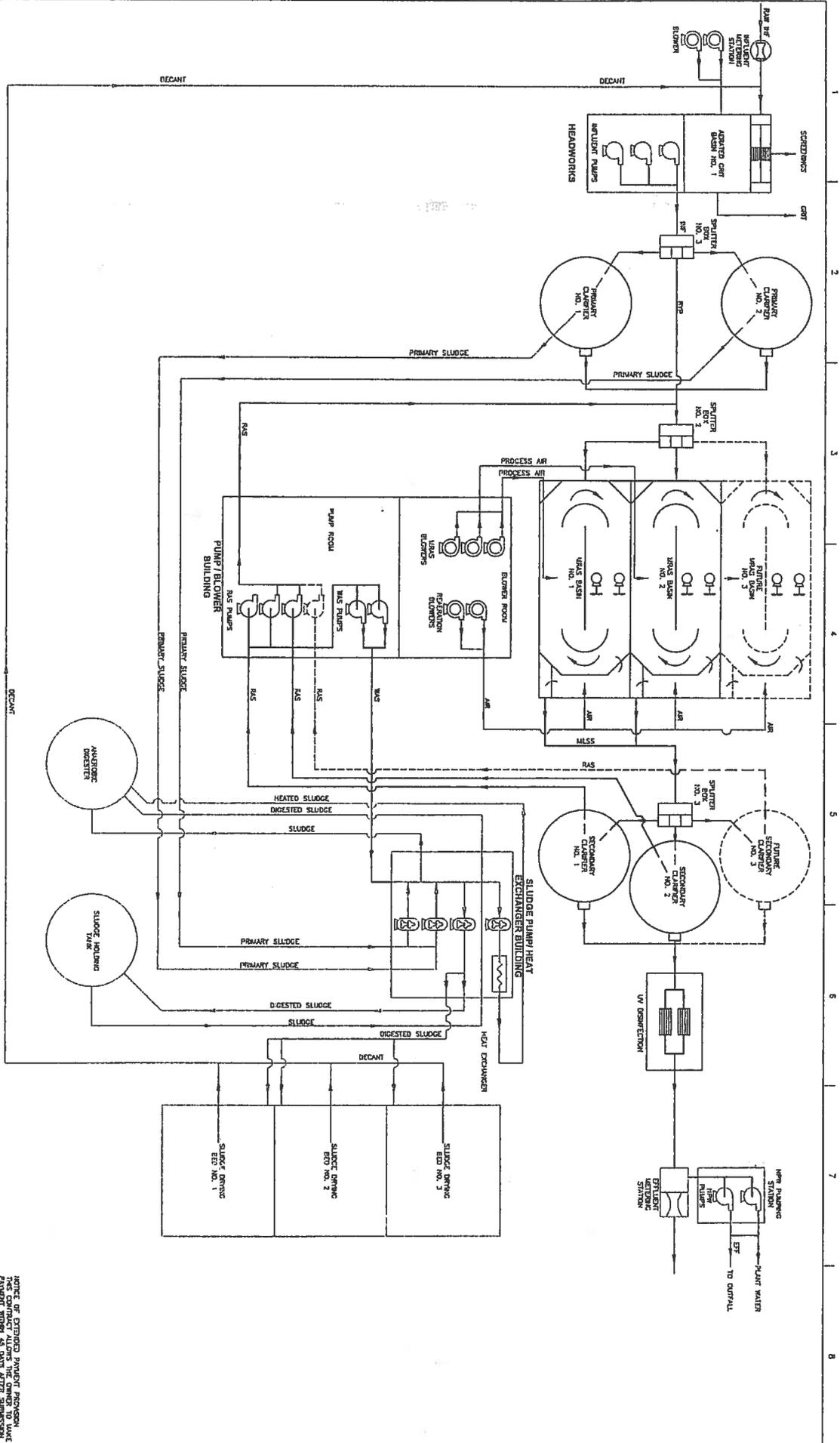
Permit Requirements for Effluent/Receiving Waters

The permit requires in Part I. Section A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

| Effluent Characteristics | Discharge Limitations | | | | Monitoring Requirements | |
|--------------------------|--------------------------------------------|------------|--------------------------------------------------|-----------|-------------------------|----------------|
| | Mass (lbs/day, unless otherwise specified) | | Concentration (mg/L, unless otherwise specified) | | Frequency | Sample Type |
| | 30-Day Avg. | 7-Day Avg. | 30-Day Avg. | Daily Max | | |
| <i>E coli Bacteria</i> | NA | NA | 126 cfu | 410 cfu | 1/week | grab |
| <i>BOD</i> | 230 | 345 | 30 | 45 | 1/week | 6/hr Composite |

Findings for Effluent/Receiving Waters

The Permittee has exceeded the daily maximum effluent limits for E. coli bacteria in August 2012. The 7 day BOD limit was exceeded in January 2013. The permittee failed to submit a DMR for the month of May 2012, see attached spreadsheet.



| ISSUE | DATE | DESCRIPTION |
|-------|------|-------------|
| | | |
| | | |
| | | |

| | |
|-----------------|-----------|
| PROJECT MANAGER | E. DUBOIS |
| DESIGNER | M. CHAZEN |
| CHECKER | C. ANGELO |
| DRAWN BY | S. GARRA |
| DRAWN BY | S. GARRA |
| PROJECT NUMBER | 117005 |



CITY OF TUCUMCARI
WASTE WATER TREATMENT FACILITY
PHASE III IMPROVEMENTS

GENERAL PROCESS SCHEMATIC

| | |
|-------|------------|
| SCALE | 1" = 10' |
| DATE | 000-02.dwg |
| SCALE | 1/8" = 1' |
| SHEET | 000-02 |

NOTE: OF EXTENDED PERIOD PROVISION...
 PLANT WITHIN 48 HRS AFTER SUBMISSION
 OF AN UNSUBMITTED REQUEST FOR PAYMENT

**NMED/SWQB
Site Overview**

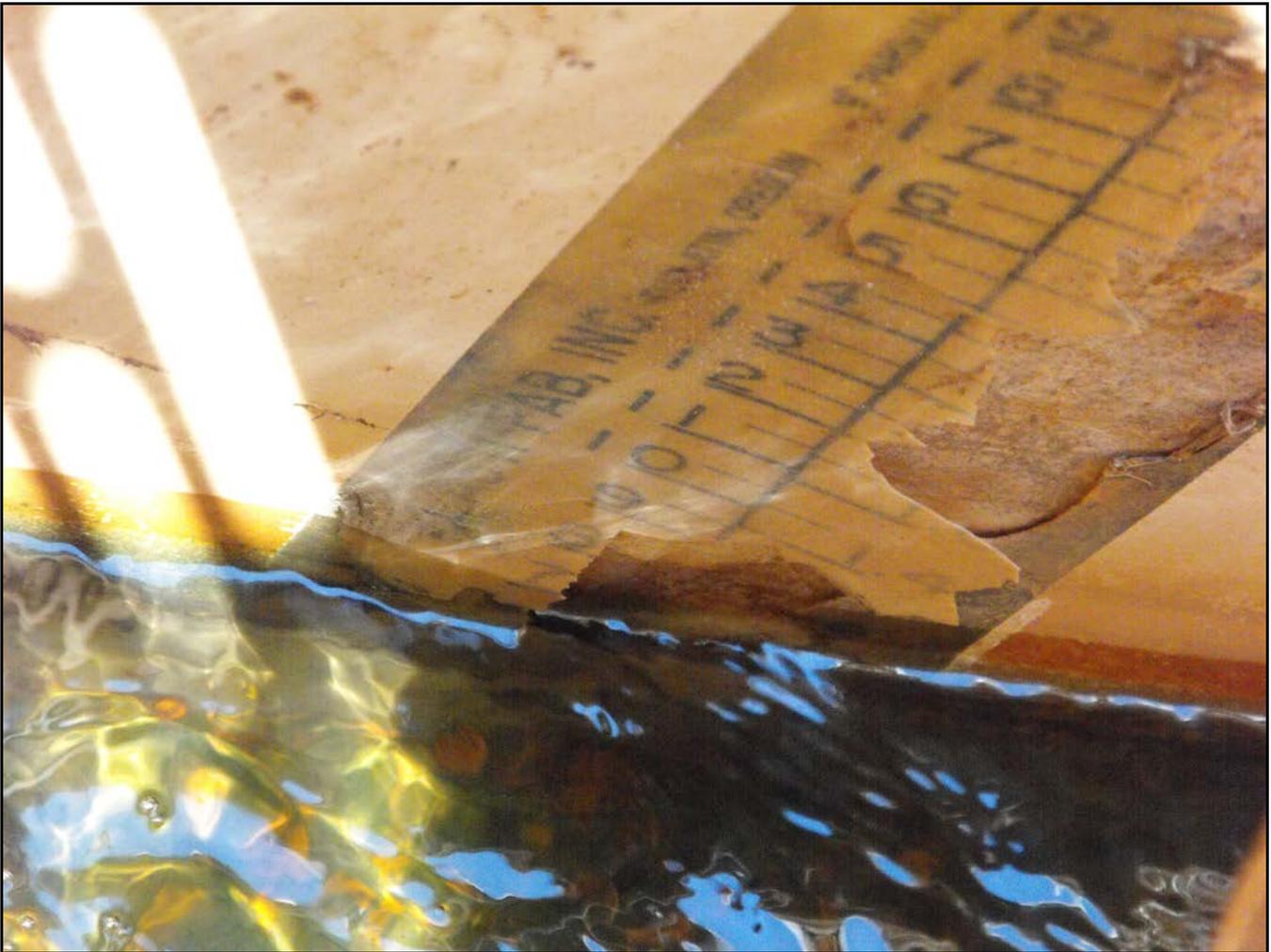
| | |
|--------------------------------------------------------------------------------|--|
| City/County: Tucumcari, NM/Quay County | |
| Location: Tucumcari WWTP, 2508 N. Rock Is., Tucumcari, New Mexico | |
| Subject: Tucumcari WWTP, picture taken 3/21/2012, recycle pond is being built. | |



**NMED/SWQB
Official Photograph Log**

Photo # 1

| | | |
|------------------------------------------------------------------------------------------|-----------------|------------------|
| Photographer: Daniel Valenta | Date: 8/15/2013 | Time: 1340 hours |
| City/County: Tucumcari, NM/Quay County | | |
| Location: Tucumcari WWTP, 2508 N. Rock Is., Tucumcari, New Mexico, facing east. | | |
| Subject: Staff gauge on outfall flume. The gauge is cracked and cannot be read below 7". | | |



**NMED/SWQB
Official Photograph Log**

Photo # 2

| | | |
|---------------------------------------------------------------------------------|-----------------|------------------|
| Photographer: Daniel Valenta | Date: 8/15/2013 | Time: 1353 hours |
| City/County: Tucumcari, NM/Quay County | | |
| Location: Tucumcari WWTP, 2508 N. Rock Is., Tucumcari, New Mexico, facing east. | | |
| Subject: Storage pond for effluent, to be piped to other areas for reuse. | | |

