



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

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**Certified Mail - Return Receipt Requested**

September 19, 2013

Mr. David Sonnenberg  
Operations Superintendent  
For Water and Wastewater  
City of Bloomfield  
P.O. Box 1838  
Bloomfield, NM 87413

**Re: Bloomfield Wastewater Treatment Plant; Major; Municipal; SIC 4952; NPDES Compliance Evaluation Inspection; NM0020770; August 22, 2013**

Dear Mr. Sonnenberg:

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

Bloomfield WWTP  
September 19, 2013  
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If you have any questions about this inspection report, please contact Barbara Cooney at 505-827-0212 or at [barbara.cooney@state.nm.us](mailto:barbara.cooney@state.nm.us) .

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-Wagnon, 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 1, Robert Italiano 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   7   0   11   12   1   3   0   8   2   2   17   18   C   19   S   20   1					
Remarks					
B   L   O   O   M   F   I   E   L   D   W   W   T   P   M   A   J   O   R   M   U   N   I   C   I   P					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67       1   69	70   3	71   N	72   N	73	74   75   M   A   J   O   R     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) City of Bloomfield WWTP – Location: 1176 Church Street- From Bernalillo take State Hwy 550 north to Bloomfield, at the intersection of SH 550 and SH 64 turn left (west) go to Church Street, Turn Left(south) travel aprox. ½ mile to the WWTP. San Juan County, New Mexico	Entry Time /Date 0950 Hours / August 22, 2013	Permit Effective Date September 1, 2009
	Exit Time/Date 1715 Hours/ August 22, 2013	Permit Expiration Date August 31, 2014
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) David Sonnenberg –Operations Superintendent (505) 632-0776 Jeff Lock – Operator/Laboratory Analyst (505) 632-0776 Ronnie McQueen – Operator	Other Facility Data SIC: 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number David Sonnenberg –Operations Superintendent (505) 632-8475 or (505) 820-7182 915 North First Street Bloomfield, NM 87413	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Latitude- North 36° 43'42" Longitude- West 107° 57'00"

#### Section C: Areas Evaluated During Inspection

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

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

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

See Further Explanations Section of the Report For Details.

Name(s) and Signature(s) of Inspector(s) /S/ Barbara Cooney	Agency/Office/Telephone/Fax NMED/SWQB 505-827-0212	Date September 19, 2013
Signature of Management QA Reviewer /S/ Bruce Yurdin	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2795	Date September 20, 2013

## 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: Errors on Daily Flow Records July 2013

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 Yes \_\_)

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: Not evaluated.

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  Y  N  NA  
 TYPE OF DEVICE

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\_)  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

**SECTION F - LABORATORY (CONT'D)**2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED  Y  N  NA3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.  S  M  U  NA4. QUALITY CONTROL PROCEDURES ADEQUATE.  S  M  U  NA5. DUPLICATE SAMPLES ARE ANALYZED. 10 % OF THE TIME.  Y  N  NA6. SPIKED SAMPLES ARE ANALYZED. 10 % OF THE TIME. Spike samples analyzed as part of the DMR QA study.  Y  N  NA7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME                    Huther & Associates  
 LAB ADDRESS                Denton, TX  
 PARAMETERS PERFORMED    Whole Effluent Toxicity Test

**SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS.**  S  M  U  NA (FURTHER EXPLANATION ATTACHED YES ).

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
	None	Slight	Slight	None	Yes	Greenish Brown	None

RECEIVING WATER OBSERVATIONS  
 See Attached Further Explanations.

**SECTION H - SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED YES ).  
 DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. Not enough capacity in drying beds to handle solids produced  S  M  U  NA2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503.  S  M  U  NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: \_\_\_\_\_ (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  NA4. FLOW PROPORTIONED SAMPLES OBTAINED.  Y  N  NA5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE.  Y  N  NA6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE.  Y  N  NA7. SAMPLE SPLIT WITH PERMITTEE.  Y  N  NA8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED.  Y  N  NA9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.  Y  N  NA

City of Bloomfield WWTP  
NPDES Permit Number NM0020770  
Compliance Evaluation Inspection  
22 August 2013  
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**Introduction**

A Compliance Evaluation Inspection (CEI) was conducted at the City of Bloomfield Wastewater Treatment Plant (WWTP) by Ms. Barbara Cooney of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) on 22 August 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.

This facility is a major municipal waste water treatment plant (WWTP) under the Federal Clean Water Act (CWA), section 402 National Pollutant Discharge Elimination system (NPDES) permit program and is assigned NPDES permit number NM0020770. The Standard Industrial Classification Code (SIC) is 4952. The facility discharges into the San Juan River in water quality segment 20.6.4.408 of the San Juan Basin (*State of New Mexico Standards for Interstate and Intrastate Surface Waters*). The designated uses for the segment are municipal and industrial water supply, irrigation, livestock watering, wildlife habitat, secondary contact, marginal coldwater aquatic life and warmwater aquatic life.

**Inspection Details**

The inspector arrived at the Bloomfield WWTP at 9:50 a.m. a.m. Mr. David Sonnemberg, Operations Superintendent, Mr. Jeff Lock, Plant Operator and Laboratory Analyst and Mr. Ronnie McQueen, Operator accompanied the inspector through the plant during the inspection. The Inspector made introductions, showed her credentials and explained the purpose of her visit. The Operators accompanied Ms. Cooney as she toured the WWTP and the laboratory. Ms. Cooney was provided at her request all records of plant and laboratory activity for the month of July 2013 for a records review. An exit interview was held with Mr. Sonnenberg, Mr. Loch and Mr. McQueen following the inspection. The Inspector left the WWTP at 5:17 p.m.

**Treatment Scheme**

The Bloomfield WWTP is designed to treat 0.9 MGD. The collection system is estimated to be 148 miles long and services a population of approximately 7800 people. The head works of the WWTP were upgraded in 2005. Influent flow is measured with Parshall flume with a staff gauge and an ultrasonic flow meter that totalizes the flow. The head works has split channels, one is to a manual bar screen, the other to the mechanical grit and solids removal system including a screw pump. The channels converge at an aerated grit chamber. The manual bar screen channel is a back up and was not being used at the time of the inspection. From the aerated grit chamber three sump pumps lift the influent water to the aeration basins. The sump pumps are run on rotation. One pump is rested at a time.

The two aeration basins are run in parallel. The square basins are above ground because of the high water table. Aeration is accomplished with surface aerators that sit approximately four feet deep in the basins. They create a great deal of turbulence at the surface of the basins. Due to the surface location of the aerators and the square shape of the basins, aeration is not efficient and evenly distributed throughout the basins. It is likely that solids build up and become septic in the

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bottom corners of the basins. The basins color was a light brown, indicating older microbes and solids that are less efficient at aerobic treatment. From the aeration basins, decant is sent to the two secondary round clarifiers (run in parallel), then to the square serpentine chlorine contact chamber. Dechlorination follows that process and the effluent flows through a Parshall flume with a fixed staff gauge, and an ultrasonic flow meter reads the discharge volume. This is the sampling location for the NPDES permit. The flow then goes to the San Juan River through an enclosed pipe that is approximately 1/8 mile in length.

### **Sludge**

According to the operator, solids are wasted from the secondary clarifiers to an open air chamber identified as the aerobic digester / solids thickener. The aerobic digester was not being aerated at the time of the inspection. The contents of the chamber were visibly anaerobic with a light brown - grey color. A fair amount of bubbling was occurring and the sulfurs odor being emitted by the contents of the basin was noticeable from well outside the treatment plant boundaries. Decant from the digester / solids thickener is sent back to the head works where it mixes with the raw influent. From the digester / solids thickener, solids are sent to the belt press, then hauled to the sludge drying beds. Final disposal of solids is to a surface disposal site at the Bondad landfill in Colorado. The sludge drying beds have under drains that direct liquids back to the head of the plant.

Grit removed from the head works is collected in a wheel barrow or hopper and after passing the paint filter test disposed of in the landfill.

### **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 A – Permit Verification – Overall Rating of “Satisfactory”**

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

### **Permit Requirements For Record Keeping and Reporting**

The permit requires in Part III.3. C. MONITORING AND RECORDS

#### ***4. RECORD CONTENTS***

*Records of monitoring information shall include:*

- a. The date, exact place, and time of sampling or measurements;*
- b. The individual(s) who performed the sampling or measurements;*
- c. The date(s) and time(s) analyses were performed;*
- d. The individual(s) who performed the analyses;*
- e. The analytical techniques or methods used; and*
- f. The results of such analyses.*

### **Findings For Record Keeping and Reporting:**

Errors were made on the records for Flow Measurements during the month of July 2013. This caused daily flows to be estimated, and affected the loading calculations for that period. This

was due to a new employee collecting the data. The facility managers have worked with the employee to correct the errors and to prevent future mistakes in recording.

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

#### **Permit Requirements For Operation and Maintenance**

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

*a. The permittee shall properly and maintain all facilities and systems of treatment and control (and 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 operations 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.*

#### **Findings For Operation and Maintenance:**

Numerous facility design problems were observed during this inspection. Most of these are repeat findings.

1. Aeration Basins - The parallel aeration basins have surface aerators that mix approximately the top six feet of the chambers. The paddles cause a great deal of turbulence and frequent splash over. Regardless of the highly turbulent surface these aerators create, the lower 2/3 of each basin does not receive adequate and reliable aeration and mixing, causing anoxic and potentially even septic conditions.

2. Aerobic digester / sludge thickener - This basin was septic. There was no indication of any aerobic activity in the basin. The odor from the basin was indicative of a septic condition and was evident more than several hundred yards outside the boundary of the WWTP property. The Clean Water Act does not regulate odors. However odors can be an indicator of how well a treatment plant is or is not operating. The rate of solids removal should be increased.

3. Secondary Clarifiers - The sludge blanket was 4 feet deep. The operators have increased the solids wasting since the last inspection.

The weirs have been replaced on the secondary clarifiers and this is helpful at reducing floating solids from being sent to the chlorine contact chamber. However, floating solids are still getting through.

There was some algae build up on the weirs and floating solids were observed getting through the treatment unit.

4. Concrete cracks - This WWTP was built in 1978. New head works were built and put on line approximately 5 years ago. Throughout the WWTP there are indications of failing concrete,

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including cracks throughout all the treatment units including the secondary clarifiers. Inside the basins the concrete is pitted and crumbling from the many years of exposure to the caustic wastewater. Structural rebar is visible through the deteriorating treatment units. Metal parts and water works are showing signs of rusting throughout. The facility has contracted with a concrete specialist to evaluate the condition.

5. Aging treatment units and obsolete treatment units - The motors for the aeration basin paddle aerators are heavily worn, rusting and leaking oil.

6. Effluent color was slightly turbid greenish brown - The effluent color was indicative of ineffective treatment throughout the WWTP. The color of the effluent was similar to what is commonly found in trickling filter processes. Activated sludge sewage treatment should be able to produce a much more clear effluent than was observed at this facility.

7. Chlorine Contact Chamber - The serpentine chlorine contact chambers were very turbid. Floating solids were observed in the chamber. Operators have installed a surface baffle to catch floating solids before they reach the effluent discharge point. However because floating solids are visible throughout the water column, the surface baffles are only partially effective at removing all of it. Operator indicated that at one time they installed additional screens at the end of the chlorine contact chambers to catch the solids but the screens became clogged to quickly for the operator to keep up with cleaning it, and the screens were removed. This is a repeat finding.

8. Grease in collection system - There were noticeable amounts of grease in the treatment units. The city is encouraged to pursue enforcement of the existing grease ordinances especially for restaurants and other commercial establishments that could be adding grease to the system.

9. Collection System overflow – January 26, 2013 a collection system overflow resulted in 5800 gallons of raw sewage to be spilled. The spill did not reach the river. The operators have increased their inspection of this part of the collection system to prevent future spills.

**Section D – Self Monitoring – Overall Rating of “Satisfactory”**

**Section E – Flow Measurements – Overall Rating of “Not Evaluated”**

**Section F - Laboratory - Overall Rating of "Satisfactory"**

**Section G - Effluent and Receiving Water - Overall Rating "Marginal"**

**Permit Requirements For Effluent and Receiving Water**

The permit requires in Part I. Section A. Limitations and Monitoring Requirements:

**2. FLOATING SOLIDS, VISIBLE FOAM AND/OR OILS**

*a. There shall be no discharge of floating solids or visible foam in other than trace amounts.*

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**The permit requires in Part I. Section A. Limitations and Monitoring Requirements:**

Effluent Characteristics	Lbs/day, unless noted				Mg/L, unless noted			Monitoring Requirements	
	30 Day Avg	Daily Max	7Day Avg		30 Day Avg	Daily Max	7 Day Avg	Measuring Frequency	Sample Type
pH						Minimum 6.6 su	Maximum 9.0 su	5/Week	Grab
Flow		Report MGD	Report MGD		Report MGD	NA	NA	Continuous	Totalizing Meter
BOD 5-day	225	NA	338		30	NA	45	Two/Week	24 Hour Composite
TSS	225	NA	338		30	NA	45		24 Hour Composite
E. coli Bacteria	NA	4.30 x 10 <sup>9</sup> (*3)	NA		126 cfu	126 cfu	NA	Five/Week	Grab
Total Residual Chlorine	NA	NA	NA		NA	19 µg/l	NA	Daily	Grab
Total Dissolved Solids Net Increase	22264	NA	NA		400	NA	NA	1/Quarter	3 Hour Composite

\*3 Conversion factor to determine loading limit is 3.79 x 10<sup>7</sup> x Flow in MGD x cfu/100 ml in effluent.

**Findings For Effluent and Receiving Water:**

The effluent from the WWTP was slightly turbid green-brown at the time of the inspection. There were small amounts of floating solids noted in the chlorine contact chamber and in the effluent at the Parshall Flume. The presence of floating solids is reason for the "Marginal" rating.

There were no effluent exceedences reported during the previous 12 month period. There were several incidents of fairly high BOD at or above 25mg/L. Though these values are within permit limits, it does indicate some loading, and process challenges in the aeration basins.

**Section H - Sludge Disposal - Overall Rating of "Satisfactory"**