



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

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DAVE MARTIN
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Deputy Secretary

Certified Mail - Return Receipt Requested

March 3, 2011

Mr. Steve Boyles
Chairman, Ramah Water and Sanitation District
P.O. Box 416
Ramah, New Mexico 87321

Re: Minor Municipal, SIC 4952, NPDES Compliance Evaluation Inspection, Ramah Water and Sanitation District, NM0023396, March 1, 2011

Dear Mr. Boyles,

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 Ramah WWTP received an overall evaluation rating of "1" on a scale of 1 to 5. Problems were found in all areas reviewed. 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 Ramah 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.

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

Cc: Marcia Gail Adams, USEPA (6EN-AS), by e-mail
Samuel Tate, USEPA (6EN-AS), by e-mail
Carol Peters-Wagnon, USEPA (6EN-AS), by e-mail
Diana McDonald, USEPA (6EN-AS), by e-mail
Larry Giglio, USEPA Permits Branch (6WQ-P), by e-mail
NMED District II, by email
Mike Coffman, NMED Utility Operator Certification Officer, by e-mail
Brad Reid, NMED GWQB, by e-mail

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: NO RECORDS WERE AVAILABLE FOR REVIEW. 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.

 S M U NA (FURTHER EXPLANATION ATTACHED YES)

DETAILS: FACILITY SUFFERED ADVERSE EFFECTS OF A COLD WINTER STORM. REPAIRS HAD NOT BEEN MADE AS OF THIS INSPECTION AND IT WAS AFFECTING TREATMENT EFFICIENCY.

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 YES).
 DETAILS: NO MONITORING OR ASSESSMENT OF THE EFFLUENT HAS BEEN DONE RECENTLY.

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 V-NOTCH WEIR
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: FACILITY HAS NOT MONITORED THEIR EFFLUENT.

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 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. ___ % OF THE TIME. Y N NA
6. SPIKED SAMPLES ARE ANALYZED. ___ % OF THE TIME. Y N NA
7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME

LAB ADDRESS

PARAMETERS PERFORMED

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
001	NONE	NONE	SLIGHT	NONE	SLIGHT	CLOUDY	

RECEIVING WATER OBSERVATIONS ___ DUE TO LACK OF MONITORING IT IS IMPOSSIBLE TO KNOW WHAT EFFECT THE EFFLUENT IS HAVING ON RECEIVING WATERS.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED YES).
 DETAILS: SLUDGE HAS NOW BEEN STORED ON SITE FOR FOUR YEARS. THERE IS NO PLACE TO WASTE ADDITIONAL SLUDGE FROM THE TREATMENT PROCESS.

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: N/A (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

Introduction

On March 1, 2011, Sarah Holcomb of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Ramah Wastewater Treatment Plant (WWTP). The Ramah WWTP has a design flow capacity of 0.058 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 NM0023396. This permit regulates the WWTP discharge to Togeys Drain, thence to Cebolla Creek, thence to the Rio Pescado, thence to the Zuni River in the Colorado River Basin in Segment 20.6.4.97 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 secondary 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 1230 hours on March 1, 2011, the inspector conducted an entrance interview with Mr. Brian Bruce, Board Member, and Mr. Lendricks Lementino, Operator, where she presented credentials and explained the purpose of the inspection. Mr. Lementino conducted a tour of the facility. An exit interview was conducted with Mr. Bruce and Mr. Lementino at the facility at approximately 1300 hours on March 1, 2011 to present the preliminary findings of the inspection.

Treatment Scheme

The Ramah WWTP serves approximately 500 residences, a church, two schools and a restaurant. The approximately eleven year old WWTP is an extended aeration, activated sludge package plant. The treatment train is preceded by a small wet well lift station. The plant itself consists of a bar screen, anoxic basin, aeration basin, clarifier, aerobic sludge digester, chlorine contact chamber, dechlorination unit and a v-notch weir as the effluent leaves the plant to be discharged into the Togeys Drain.

Most raw sewage in the collection system flows by gravity to an on site lift station. Influent passes through the manual bar screen and enters an anoxic basin. The aeration basin has a baffle to direct wastewater through an opening into a narrow partition channel as a means to capture a portion of the floatable solids before they enter the aeration basin. Solids collected in this channel are pumped to the sludge digester.

From the aeration basin, the wastewater enters the clarifier and from the clarifier it enters the chlorine chamber. After chlorination, the effluent enters the dechlorination chamber and then flows through a v-notch weir to the outfall.

Solids Management

The facility has three concrete sludge drying beds with underdrains to collect excess wastewater, which is then pumped to the headworks.

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.

Recordkeeping and Reporting

Section B – Recordkeeping and Reporting Evaluation – Overall rating of Unsatisfactory

The permit requires, in Part III, Section C.3, Retention of Records:

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, for a period of at least 3 years from the date of the sample, measurement, report or application. This period may be extended by request of the Director at any time.

The permit requires, in Part III, Section D.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.*

The permit requires, in Part III, Section D.4, Discharge Monitoring Reports and Other Reports:

Monitoring results must be reported on Discharge Monitoring Report (DMR) Form EPA Number 3320-1 in accordance with the “General Instructions” provided on the form. The permittee shall submit the original DMR signed and certified as required by Part III.D.11 and all other reports required by Part III.D to the EPA at the address below. Duplicate copies of DMRs and all other reports shall be submitted to the appropriate State agency(ies) at the following address(es):

EPA:

*Compliance Assurance and Enforcement Division
Water Enforcement Branch (6EN-W)
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733*

New Mexico:

*Program Manager
Surface Water Quality Bureau
New Mexico Environment Department
P.O. Box 5469
1190 Saint Francis Drive
Santa Fe, NM 87502*

Findings for Recordkeeping and Reporting:

This facility has had trouble retaining a certified operator to actually operate the facility. One operator was employed by the Water and Sanitation District, but according to the facility representative, he was unreliable. At the time of the inspection, that operator had not been seen for two weeks. The Board contracted with another operator to try to rectify the noncompliance that was currently occurring.

Due to the problems with staff, there were no records to review. No DMRs had been submitted to the state for almost two years (since September 2009). Since there were no process control, flow, or analytical monitoring records, it was impossible for the inspector to evaluate whether data reported on the DMRs prior to 2009 was accurate.

Operations and Maintenance

Section C – Operations and Maintenance Evaluation – Overall rating of Unsatisfactory

The permit requires, in Part II.D, Contributing Industries and Pretreatment Requirements:

1. *The following pollutants may not be introduced into the treatment facility:*
 - c. *Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW, resulting in Interference;*

The permit requires, in Part III.B.3, Proper Operation and Maintenance:

- a. *The permittee shall at all times properly operate and maintain all facilities and systems of 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 operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.*

Findings for Operation and Maintenance:

As mentioned earlier, this facility serves about 500 residences, 2 schools, a church and a restaurant. A large amount of foam was observed in the aeration basin and the facility representative indicated that there were some problems with grease from the elementary school and the restaurant. The high school in the area was built a few years ago and has a new grease trap installed. The elementary school and the restaurant do not, and the board is planning to send out letters to the community asking residents to not dispose of their grease down the drain. This is important, as grease can not only cause problems at the wastewater treatment plant, but can also accumulate in the collection system and cause corrosion problems in time.

Treatment units were not being properly operated at the time of this inspection. New Mexico experienced a severe cold snap at the beginning of February, with record lows experienced in many parts of the state. Ramah was at overnight temperatures of approximately -20° F for three nights. This caused problems at the plant, in that the facility is completely outdoors and all the equipment was not buffered from the temperatures. Pipes froze and pumps broke, so currently the anoxic basin is not functioning as it should because there is no air being directed to the basin. The facility has two Return Activated Sludge (RAS) lines directing sludge back to the aeration basin. One of these lines is currently not functioning.

The color of the material in the aeration basin was extremely dark, indicating very high solids content in the facility. When asked, the contract operator indicated that the sludge age in the clarifier was probably around 4 months. This was also indicated by the bulking sludge and denitrification processes observed in the clarifier.

The facility does have a generator onsite in the event of power failures, but it is not currently working. The unit can be turned on manually, but a part is on order that will allow it to turn on automatically if there is a power failure.

There is no alarm system for the facility, other than a street light installed at the headworks of the facility. The facility representative indicated that if the power goes out, that light goes out as well as the power in half of the town. He said that he lives close enough that he can see if the power goes out (if the street light goes out) from his home.

The facility has not been able to employ a certified operator for years. The operator who was working at the facility most recently did not have any certification, and the contract operator currently working at the facility does not have certification either. The facility representative indicated that he would like to get three to four people trained and certified in order to have backups to run the plant.

Self-Monitoring

Section D – Self-Monitoring Evaluation – overall rating of Unsatisfactory.

Permit Requirements for Self-Monitoring:

The permit requires in Part III.C.5:

- a. *Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.*
- b. *The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.*
- c. *An adequate analytical quality control program, including the analyses of sufficient standards, spikes and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.*

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

<i>EFFLUENT CHARACTERISTICS</i>	<i>DISCHARGE MONITORING</i>		<i>MONITORING REQUIREMENTS</i>	
<i>WHOLE EFFLUENT TOXICITY TESTING (48-Hour Static Renewal)</i>	<i>30-DAY AVG MINIMUM</i>	<i>48-HR MINIMUM</i>	<i>MEASUREMENT FREQUENCY</i>	<i>SAMPLE TYPE</i>
<i>Daphnia pulex</i>	<i>Report</i>	<i>Report</i>	<i>Once/first year of permit (*4, 5)</i>	<i>24-Hr Composite</i>

**4: The sample for the WET test for Outfall 001 shall be taken during the period November 1 and April 30 during the first year of the permit. The permittee shall submit the results of any toxicity testing performed in accordance with Part II of the permit. See Part II, Whole Effluent Toxicity Testing Requirements for additional WET monitoring and reporting conditions.*

Findings for Self-Monitoring:

The permittee had not submitted DMRs to the state since September 2009. While the inspector was onsite, there were no paper records to indicate that monitoring had actually been conducted, prior to and since the last DMR submission. To Mr. Bruce and Mr. Lementino's knowledge, no sampling and assessment had been done for quite some time.

There was also no record of the facility having conducted the required biomonitoring test. The permit was reissued to the Ramah Water and Sanitation District on February 1, 2008, therefore the biomonitoring test should have been completed by April 30, 2009.

Flow Measurement

Section E – Flow Measurement Evaluation – overall rating of Unsatisfactory.

Permit Requirements for Flow Measurement:

The permit requires, in Part III, Section 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 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:

The permittee also did not have any records to show that calibrations had been performed to assure the discharge is within 10% or less of actual discharge rates. Flow measurements are important to obtain accurate loading values for the pollutants required to be monitored in the permit. Flow measurement devices should be calibrated once a year by an outside representative, and facility staff should also calibrate the devices periodically in between to assure that the equipment is functioning properly.

Laboratory

Section F – Laboratory Evaluation – overall rating of Unsatisfactory.

Permit Requirements for Laboratory:

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:

From the records review, the inspector knew that chlorine in the discharge had been a major concern at the last NPDES inspection. In accordance with that observation, the inspector asked the facility staff to take a chlorine sample during the inspection. The staff responded by indicating that they did not have the proper equipment on site to be able to do so. The permittee must obtain the proper equipment to be able to analyze the effluent leaving the facility as soon as possible.

Effluent/Receiving Waters

Section G – Effluent/Receiving Waters Evaluation – overall rating of Unsatisfactory.

Permit Requirements for Effluent/Receiving Waters:

The permit states, in Part III, Section A.2, Duty to Comply:

The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Findings for Effluent/Receiving Waters:

Due to the lack of analytical monitoring being done at this facility, it is impossible to know whether the facility is in compliance with the effluent limitations in their permit. It is strongly encouraged that the facility get back into compliance with the conditions of this permit.

Sludge Disposal

Section H – Sludge Disposal Evaluation – overall rating of Unsatisfactory.

Permit Requirements for Sludge Disposal:

The permit requires, in Part III.B.3, Proper Operation and Maintenance:

The permittee shall at all times properly operate and maintain all facilities and systems of 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.

The permit requires, in Part IV, Element 1, Section 1.A.1, General Requirements:

The permittee shall handle and dispose of sewage sludge in accordance with Section 405 of the Clean Water Act and all other applicable Federal Regulations to protect public health and the environment from any reasonably anticipated adverse effects due to any toxic pollutants which may be present in the sludge.

In the Code of Federal Regulations at 40 CFR Part 503.9 (y):

...the placement of sewage sludge on land on which the sewage sludge remains for two years or less.

In the Code of Federal Regulations at 40 CFR Part 503.16 and 503.26, Management Practices - Table 1, Frequency of Monitoring:

Greater than zero, but less than 290 metric tons per 354 day period, frequency of monitoring shall be once per year.

Findings for Sludge Disposal:

The permittee did not have any records to indicate that they had conducted any testing of their sludge. This is a repeat finding from the last inspection. The monitoring requirements are based on the type of disposal being utilized by the permittee. During the inspection, the facility representative indicated that the sludge had now been stored on site for approximately four years. Sludge cannot be stored on site permanently.

The facility representative indicated that he did not know how to dispose of the sludge. The inspector reviewed the requirements with the facility representative and informed the personnel that if sludge testing was conducted, if the sludge falls into Class A quality parameters, it can be given away to farmers in the area.

An important issue with solids at this facility is that until the sludge beds are cleared and room is made to waste sludge from the wastewater treatment plant, the solids will continue to accumulate until the system becomes septic. This will cause the need for a complete restart of the system if this occurs, which is time and labor intensive. The inspector strongly encourages the facility staff to find a way to dispose of the sludge before this occurs.

NMED/SWQB

Official Photograph Log

Photo # 1

Photographer: Sarah Holcomb	Date: 3-1-2011	Time: 1309 hours
City/County: Ramah/McKinley		
Location: Ramah WWTP		
Subject: Aeration basin of the package plant. Note the dark brown color of the water, indicating a high solids content. Also note the large amount of foam from grease throughout the entire system.		



NMED/SWQB

Official Photograph Log

Photo # 2

Photographer: Sarah Holcomb	Date: 3-1-2011	Time: 1309 hours
City/County: Ramah/McKinley		
Location: Ramah WWTP		
Subject: Clarifier of the package plant. The sludge age (~4 months) indicated that wasting had not occurred for a significant amount of time. Sludge was beginning to bulk and denitrification was occurring.		



NMED/SWQB

Official Photograph Log

Photo # 3

Photographer: Sarah Holcomb	Date: 3-1-2011	Time: 1310 hours
City/County: Ramah/McKinley		
Location: Ramah WWTP		
Subject: Discharge from the WWTP after chlorination/dechlorination. Note the slightly cloudy quality of the water leaving the facility.		

