



NEW MEXICO  
ENVIRONMENT DEPARTMENT



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Acting Deputy Secretary

**Certified Mail - Return Receipt Requested**

September 9, 2011

Honorable Richard Velarde  
Mayor  
Village of Cuba  
P.O. Box 426  
Cuba, NM 87013

Re: **Minor Municipal; SIC 4952; NPDES Compliance Evaluation Inspection; Village of Cuba Wastewater Treatment Plant; (NM0024848) August 10, 2011**

Dear Mayor Velarde:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) 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.

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 to modify your operational and/or administrative procedures, as appropriate.

I wish to thank you for the cooperation of the Village of Cuba WWTP representatives including Ms. Vandora Casados, Ms. Ester Herrera and Mr. Curtis Lopez during this inspection.

If you have any questions about this inspection report, please contact me at (505) 827-0212.

Sincerely,

*/S/ Barbara Cooney*

Barbara Cooney  
Surface Water Quality Bureau

cc: Marcia Gail Adams, USEPA (6EN-AS) by e-mail  
Samuel Bates, 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  
Sonia Hall and Hannah Branning, USEPA (6EN-WC)  
NMED District II Manager by e-mail



## SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

 S  M  U  NA (FURTHER EXPLANATION ATTACHED NO )

DETAILS:

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 YES )

DETAILS: DMRs SENT IN LATE

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:

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:

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 NO )  
 DETAILS: Flow Measurement with the ultrasonic device is checked daily with the staff gauge in the Parshall flume. The measurements are within 10% and are recorded.

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 10% )  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

**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. 10 % OF THE TIME. Samples analyzed at Hall are QA'd dup. 10% - Sample analyzed by operator are not  Y  N  NA
6. SPIKED SAMPLES ARE ANALYZED. 0 % OF THE TIME. No Info available about spike samples. Lab does participate in DMR-QA study  Y  N  NA
7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME Hall Environmental Analytical Laboratory  
4901 Hawkins NE, Suite D

LAB ADDRESS Albuquerque, NM 87109

PARAMETERS PERFORMED TKN, Nitrogen Nitrites/Nitrates, Ammonia, BOD, TSS, E.coli

**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
01	NO	NO	YES	YES	NO	BROWN-GREEN	

RECEIVING WATER OBSERVATIONS: Effluent Exceedences are listed in the Further Explanations portion of this report.

**SECTION H - SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED NO ).  
DETAILS: The polishing ponds are overloaded with solids and there has not been any solids wasting in more than 10 years.

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: NA (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
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT.  Y  N  NA

Compliance Evaluation Inspection  
Village of Cuba Wastewater Treatment Plant  
NM0024848  
August 10, 2011  
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**Introduction**

On August 10, 2011 a Compliance Evaluation Inspection (CEI) was conducted at the Village of Cuba Wastewater Treatment Plant (WWTP) by Barbara Cooney of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB).

An inspection was conducted by NMED for the US Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the federal Clean Water Act. These inspections are conducted under contract with the USEPA and are used by EPA to evaluate compliance with the NPDES permit program. This inspection report is based on information supplied by the Village of Cuba representatives (the permittee), observations made by the NMED Inspectors, reports and records kept by the permittee or NMED.

The WWTP has a design flow of 0.144 MGD and is classified as a minor discharger under the federal Clean Water Act, Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned permit number NM0024848. The discharge location is to the Rio Puerco in water quality segment identified as between Arroyo Chijuilla to the Northern Boundary of the Village of Cuba - between Segments 20.6.4.105 NMAC and 20.6.4.109 NMAC of the Rio Grande Basin. At the time the permit was issued this water quality segment was considered 20.6.4.99NMAC with the designated uses of aquatic life, irrigation, livestock watering, wildlife habitat and secondary contact.

The current New Mexico Water Quality Standards effective January 14, 2011 identify this location as 20.6.4.131 of the Rio Grande Basin. The designated uses are: warmwater aquatic life, irrigation, livestock watering, wildlife habitat and primary contact.

**Inspection Details**

The Inspector arrived at the Village of Cuba offices at 13:00 p.m. An entrance interview was conducted with Ms. Ester Herrera, and Ms. Vandora Casados of the Village of Cuba. The Inspector made introductions, presented credential and discussed the purpose of this inspection. Mr. Curtis Lopez of the Village Maintenance Staff later met the Inspector at the entrance of the WWTP and accompanied her during the inspection. An exit interview was held later with Ms. Casados again at the Village offices following the inspection. The Inspector left the location at 15:30 p.m.

**Treatment Scheme**

Raw sewage enters the aerated lagoon system via the approximately 5 miles long collection system from the town. The flow is transported by gravity and one lift station in town. A second lift station at the entrance works of the WWTP carries sewage from a subdivision of about 20 homes to the WWTP. The second lift station is operated by manually turning on the lift pump twice daily. The pump is powered by natural gas stored in a tank on site. Primary treatment consists of a manual bar screen. Material removed from the bar screen are placed in a barrel adjacent to the bar screen and land filled periodically.

The sewage is split at the junction box to the two aerated lagoons. Both aerators were in operation at the time of this inspection. The sewage then flows by gravity to two polishing ponds. The wastewater then combines from the polishing pond and flow to a chlorine contact chamber. Chlorine gas is injected from a line attached to a cylinder tank into the wastewater flow before it enters the chlorine contact chamber. From the chlorine contact chamber, the flow enters one of eight sand filters. The filtered effluent flows through a 60° V-Notch weir where the flow staff gauge is located. Previously the treated effluent was discharged to an open ditch that extended approximately 1/2 mile before it reached the Rio Puerco. However the ditch berms have failed and the effluent forms a sort of braided flow over the ditch - berm and to the Rio Puerco.

### **Sludge Handling**

The facility has an onsite sludge drying bed that has not been used in many years. Large amounts of solids are currently built up in the polishing ponds. The solids have not been wasted from the ponds nor the aeration basins in many years.

### **Further Explanations**

Note: The sections are arranged according to the format of USEPA Form 3560-3 and checklist, attached, rather than being ranked in order of importance.

### **Record Keeping and Reporting**

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

The permit requires, in Part I Section C. Monitoring and Reporting.

- a. The permittee shall effectively monitor the operation and efficiency of all treatment and control facilities and the quantity and quality of the treated discharge.*
- b. Monitoring information shall be on Discharge Monitoring Reports Form(s) EPA 3320-1 as specified in Part III.D.4 of this permit and shall be submitted quarterly. Each quarterly submittal shall include separate forms for each month of the reporting period.*
- c. Reporting periods shall end on the last day of the months March, June, September and December.*
- d. The permittee is required to submit regular quarterly reports as described above postmarked no later than the 28<sup>th</sup> day of the month following each reporting period.*

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 No. 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.II and all other reports required by art II.D to the EPA at the address below. Duplicate copies of the DMR's 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, Room N2050  
Santa Fe, NM 87502-5469*

The permit requires in Part III, C. 4. Records Content

*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 times(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**

1. Discharge Monitoring Reports (DMRs) for the times period of October 1, 2010 through June 2011 were received by NMED on July 28, 2011.
2. The DMR submitted for the month of January 2011 is missing the second page that typically has the reporting information for the Total Residual Chlorine and E coli bacteria.
3. The DMRs submitted have errors including missing loading values for BOD (June 2011), and incorrect number of exceedence listed. Exceedences are reported on the DMRs for parameters that have a "report" requirement as part of the compliance schedule. Those parameters include, TKN, Ammonia and Phosphorous. The compliance schedule extends to 1 day less than 3 years from the effective date of the permit.

**Operation and Maintenance**

**Permit Requirements for Operation and Maintenance**

The permit requires, in Part III, Section 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 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.*

The permit requires in part I, Section B., Schedule of Compliance

*The permittee shall achieve compliance with the total nitrogen, total phosphorous, and total ammonia effluent limitation specified for discharges in accordance with the following schedule:*

<i>Activity</i>	<i>Date of Completion</i>
<i>Commence Construction</i>	<i>1 year after permit effective date</i>
<i>Complete Construction</i>	<i>3 years after permit effective date</i>
<i>Achieve Final Effluent Limitations</i>	<i>3 years after permit effective date</i>

*The permittee shall submit progress reports along with the DMRs Quarterly at the Schedule specified in the section C.1.d, below.*

The permit requires, in Part I Section C. Monitoring and Reporting.

- a. The permittee shall effectively monitor the operation and efficiency of all treatment and control facilities and the quantity and quality of the treated discharge.*
- b. Monitoring information shall be on Discharge Monitoring Reports Form(s) EPA 3320-1 as specified in Part III.D.4 of this permit and shall be submitted quarterly. Each quarterly submittal shall include separate forms for each month of the reporting period.*
- c. Reporting periods shall end on the last day of the months March, June, September and December.*

*d. The permittee is required to submit regular quarterly reports as described above postmarked no later than the 28<sup>th</sup> day of the month following each reporting period.*

#### **Findings for Operation and Maintenance**

1. There are no back-ups for the two aerators in the aeration basins. According to plant representatives, both the aerators are run 24 hours a day 7 days a week.
  1. The settling ponds are heavily over loaded with solids.
  2. The chlorine contact chamber has walls that are falling down. Also, the chamber does not appear to have been cleaned at any time. Because of the location of the chlorine contact chambers - directly after the settling ponds and before the sand filters, there appears to be more solids in the chambers than is optimal for this type of treatment unit. Additionally, the location requires that very heavy dosing of chlorine is necessary to maintain disinfection through the sand filters. This is a design flaw in the WWTP. Typically disinfection w/ Chlorine and de-chlorination occurs as the final treatment process.
  3. The eight sand filters have serious clogging problems. The sand media is a mix of rocks, sand and gravel not appropriate for this type of treatment unit. The sand filters were flooded by surface run off due to a rain storm many years ago and a large amount of clay soil from the surrounding area now clogs the pore spaces between the sand and rocks. The location of the chlorine contact chamber upstream in the treatment works of the sand filters results in accumulation of the chlorine salts in the filter beds, adding to the impermeability of the treatment units. The operators do clean and rototill the sand filters to a depth of about 1.5' throughout the year, unfortunately this maintenance improves filtration and permeability for a few months.
  4. There were no records of calibration for the effluent flow meter.
  5. The design of this WWTP is not sufficient to meet the required effluent limits. The permit has outlined a compliance schedule for the construction of a new WWTP. Construction is to have begun. This facility would have needed to commence with construction on September 1, 2011 to meet this compliance schedule. This has not occurred as of the time this inspection report is written.
  6. The Certified Operator who had managed this WWTP for many years retired in the fall of 2010. Since that time the Village of Cuba has had challenges employing and retaining a certified operator. At the time of the inspection, the responsibility of plant maintenance was added to the duties of the drinking water operator, Mr. Antonio Crespein and maintenance worker Mr. Curtis Lopez. This is not an adequate operational staff to maintain the facility, and to carry out all the sampling and monitoring requirements.

#### **Effluent/Receiving Waters Observations**

#### **Permit Requirements for Effluent Limitations and Monitoring Requirements**

The permit requires in Part III, C.5. Monitoring Procedures

- 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 the measurements and shall maintain appropriate record of such activities.*

#### **Findings for Effluent Limitations and Monitoring Requirements**

Since the effective date of the current NPDES permit, the following effluent exceedences have occurred as reported on the DMRs. Additionally missing monitoring samples are also noted in the table below. The dates are listed in descending order with the most recent listed first.

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<b>Date</b>	<b>Pollutant</b>	<b>Permit Limit</b>	<b>Concentration Reported on DMRs</b>
June 2011	BOD Loading 30 day avg lbs/day	36 lbs/day	Missing on DMR
June 2011	BOD Loading 7 day avg	54 lbs/day	Missing on DMR
June 2011	BOD 30 day avg mg/L	30 mg/L	36 mg/L
May 2011	BOD 30 day avg mg/L	30 mg/L	56 mg/L
May 2011	BOD 7 day avg mg/L	45 mg/L	68 mg/L
May 2011	Total Residual Chlorine(TRC) Daily Max	19 µg/L Or 0.019mg/L	Possible error
April 2011	BOD Loading 30 day avg lbs/day	30 mg/L	41.5 mg/L
April 2011	TSS 30 day avg mg/L	30 mg/L	56 mg/L
April 2011	TSS 7 day avg mg/L	45 mg/L	59 mg/L
March 2011	BOD 30 day avg mg/L	30 mg/L	35 mg/L
March 2011	To Total Residual Chlorine(TRC) Daily Max	19 µg/L Or 0.019mg/L	Possible error
February 2011	BOD 30 day avg mg/L	30 mg/L	38 mg/L
February 2011	To Total Residual Chlorine(TRC) daily max	19 µg/L Or 0.019mg/L	Possible error
February 2011	E. coli bacteria daily max - cfu	2507 cfu	19863 cfu
February 2011	E. coli bacteria 30 day avg - cfu	548 cfu	16000cfu
January 2011	Ecoli reports Missing		
January 2011	TRC reports missing		
December 2010	TSS 30 day avg mg/L	30 mg/L	39 mg/L
December 2010	TSS 7 day avg mg/L	45 mg/L	50 mg/L
December 2010	TRC	19 µg/L Or 0.019mg/L	Possible Error

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<b>Date</b>	<b>Pollutant</b>	<b>Permit Limit</b>	<b>Concentration Reported on DMRs</b>
November 2010	BOD 30 day avg mg/L	30 mg/L	38.5 mg/L
December 2010	TRC	19 µg/L Or 0.019mg/L	20 ug/L
October 2010	TSS 30 day avg mg/L	30 mg/L	64 mg/L
October 2010	TSS 7 day avg mg/L	45 mg/L	74 mg/L
October 2010	To Total Residual Chlorine(TRC) daily max	19 µg/L Or 0.019mg/L	Possible error

On the DMRs submitted, TRC for March 2011 is reported as 0.025 µg /L. The TRC value being reported on the DMRs appears to be inaccurate for the unit of measurement of micrograms/Liter or µg /L. The Hach chlorine meter used for this measurement is not sensitive enough to read values as low as 0.025 µg /L. It is more likely the value reported should be listed as 0.025 mg/L or 25 µg /L.

0.001mg/L = 1.0 µg /L.

It is a common error to mix up units. It is necessary for operators and laboratory analyst to be careful when recording results.