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Surface Water Quality Bureau

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BUTCH TONGATE
Deputy Secretary

JAMES H. DAVIS, Ph.D.
Director
Resource Protection Division

Certified Mail - Return Receipt Requested

July 30, 2012

Cynthia Nava, Superintendent
Gadsden Independent School District #16
Gadsden Administrative Complex
P.O. Drawer 70
Anthony, New Mexico 88021

Re: **Minor Non Municipal; SIC 8211; NPDES Compliance Evaluation Inspection; Gadsden Independent School District #16, Waste Water Treatment Facility, NM0028487, Anthony, New Mexico, July 12, 2012**

Dear Ms. Nava,

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. The main problems were found in the area Record Keeping & Reporting, Self-Monitoring Program, Operations & Maintenance, Laboratory, and Flow Measurement. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing, both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

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

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

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

Sincerely,

/s/Daniel Valenta

Daniel Valenta
Environmental Scientist/Specialist
Surface Water Quality Bureau

Cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Samuel Tate, 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
NMED District III 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 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="8"/> <input type="text" value="4"/> <input type="text" value="8"/> <input type="text" value="7"/> 11 <input type="text" value="1"/> 12 <input type="text" value="2"/> <input type="text" value="0"/> <input type="text" value="7"/> <input type="text" value="1"/> <input type="text" value="2"/> 17 18 <input type="text" value="C"/> 19 <input type="text" value="S"/> 20 <input type="text" value="2"/>	Remarks																											
Inspection Work Days		Facility Evaluation Rating					BI	QA	Reserved																			
67	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	69	70	<input type="text" value="2"/>	71	<input type="text" value="N"/>	72	<input type="text" value="N"/>	73	<input type="text"/>	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) Gadsden Independent School District #16, Middle School, 1301 W. Washington and High School, 6301 Highway 28 Drive, Anthony, NM 88021. Doña Ana County	Entry Time /Date 0905/July 12, 2012	Permit Effective Date July 1, 2008
	Exit Time/Date 1320/July 12, 2012	Permit Expiration Date June 30, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mario Apadoca / Gadsden ISD, WWTP Operator/575-621-5839 Raul Sanchez / Gadsden ISD, WWTP Operator / 575-882-6914	Other Facility Data LAT 31.999280 N LONG -106.635388 W SIC 8211	
Name, Address of Responsible Official/Title/Phone and Fax Number Cynthia Nava, Gadsden Administrative Complex, P.O. Drawer 70, Anthony, NM 88021/ Superintendent / 575-882-6203 or 882-6200	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)

<input type="text" value="S"/>	Permit	<input type="text" value="U"/>	Flow Measurement	<input type="text" value="M"/>	Operations & Maintenance	<input type="text" value="N"/>	CSO/SSO
<input type="text" value="U"/>	Records/Reports	<input type="text" value="U"/>	Self-Monitoring Program	<input type="text" value="S"/>	Sludge Handling/Disposal	<input type="text" value="N"/>	Pollution Prevention
<input type="text" value="S"/>	Facility Site Review	<input type="text" value="N"/>	Compliance Schedules	<input type="text" value="N"/>	Pretreatment	<input type="text" value="N"/>	Multimedia
<input type="text" value="S"/>	Effluent/Receiving Waters	<input type="text" value="U"/>	Laboratory	<input type="text" value="N"/>	Storm Water	<input type="text" value="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/fax 505-827-0160	Date 7/30/2012
Signature of Management QA Reviewer RICHARD E. POWELL /s/Richard Powell	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2798	Date 7/30/2012

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:

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. Y N NA
Values for TRC were reported in mg/l not ug/l. Required BOD & TSS loading limits incorrectly calculated.
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. S M U N
- a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING **Location missing.** 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. **Missing time of analyses, unable to verify holding times.** 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. **Operators have no way to monitor oxygen levels of aeration units.** S M U NA
2. TREATMENT UNITS PROPERLY MAINTAINED. **Bypass occurring at clarifier.** S M U NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. S M U N
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. **Lead operator to retire, no level 3 to replace.** 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?
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?

Y N NA
 Y N NA
 Y N NA

10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?

Y N NA
 Y N NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS.
 DETAILS:

S M U NA (FURTHER EXPLANATION ATTACHED No.)

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

Holding time for e -Coli cannot be confirmed and pH samples held beyond holding times.

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.
 DETAILS:

S M U NA (FURTHER EXPLANATION ATTACHED Yes)

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.

Y N NA

TYPE OF DEVICE **V-notch weir and flow meter may not be functioning correctly at Middle School WWTP. Flow increased during inspection, meter did not respond to increase.**

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.
 DETAILS:

S M U NA (FURTHER EXPLANATION ATTACHED Yes)

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. 100 % 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 Water Technology Associates
- LAB ADDRESS 3400 S. Espina, Las Cruces
- PARAMETERS PERFORMED BOD, TSS, pH, e Coli **No WET TEST Required**

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. S M U NA (FURTHER EXPLANATION ATTACHED No.)

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001A	No	No	CLEAR	No	No	No	

RECEIVING WATER OBSERVATIONS:

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No.)

DETAILS: **Solids removed by liquid waste hauler to South Central Regional WWTP**

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: _____ (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

**Gadsden Independent School District
Compliance Evaluation Inspection
NPDES Permit No. NM0028487
July 12, 2012**

Further Explanations

Introduction

On July 12, 2012 Daniel Valenta, New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Gadsden Independent School District (ISD) #16 Waste Water Treatment Facility in Anthony, Doña Ana County, New Mexico. Gadsden ISD's facility, consisting of two separate treatment plants with one at the High School and one at the Middle School, has a design flow capacity of 0.09 MGD (million gallons per day) and is classified as a minor non municipal 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 NM0028487 which regulates discharge of wastewater from Outfall 001 to the Rio Grande (*Segment 20.6.4.101 State of New Mexico Standards for Interstate and Intrastate Surface Waters, New Mexico Administrative Code (NMAC)*).

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate the Permittee's compliance with the NPDES permit. This inspection report is based on information provided by the Permittee's representatives, observations made by the NMED inspectors, and records and reports kept by the Permittee and/or NMED.

The inspector arrived at the facility's physical plant offices in Anthony, New Mexico at approximately 0905 hours on the day of the inspection, made introductions and explained the purpose of the inspection to the WWTP Lead Operator, Mr. Raul Sanchez. We then went to the office of Mr. Michael Munoz, Coordinator of the Physical Plant. The inspector made introductions, explained the purpose of the inspection and presented credentials. Mr. Mario Apadoca, Operator, joined us at this time. The inspector toured the facilities with Messrs. Sanchez and Apadoca. Following the tour, a preliminary exit interview was conducted with Messrs, Sanchez, Apadoca, and Munoz. The inspection ended at 1320 hours on July 12, 2012.

Treatment Scheme

Middle School

The Middle School Waste Water Treatment Plant (WWTP), oldest of the two treatment plants at this facility, was constructed in the 1970's. Recent work completed in December of 2009 at this plant included refurbishing the main lift station with submersible pumps, relining (re-coating) basins, and upgrading and replacing aeration pipes and diffusers.

Raw wastewater from the Middle School (approximately 1,000 students and faculty), cafeteria, supporting ISD buildings, on-site caretaker residence, and vehicle maintenance shop floor drains all drain to the WWTP. The influent enters the plant via a lift station east of the aeration basin. Both the Middle School cafeteria and ISD physical plant vehicle wash bays have grease traps before the lift station. The lift station is located in a covered building which pumps wastewater from a wet well to the aeration basin. A light alarm at the lift station is visible from the on-site caretaker residence.

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Lifted wastewater then enters the treatment plant through a screening basket. Screenings are placed in buckets and allowed to dry for final disposal at a municipal solid waste landfill in Sunland Park, New Mexico. After being screened, the wastewater enters a rectangular, baffled aeration basin. Return Activated Sludge (RAS) from the clarifier is pumped to the head of the aeration basin. Air is provided by two blowers. The blowers provide the lift needed to continuously remove RAS to the aeration basin.

Floating material is removed manually from the clarifier. Flow leaving the clarifier then enters the chlorine contact chamber. Chlorination is provided by the chlorine (Calcium hypochlorite) pellet tube unit as the flow enters the chamber. Flow is measured leaving the chlorine contact chamber. As flow exits the chlorine contact chamber, it passes over a notched weir. The notch in the flow measurement weir did not appear "V"-shaped, but modified or worn down to a trapezoid (see photo 2). There was no channel box before the weir.

After the weir, flow enters a pipe with a de-chlorination (Sodium sulfite) pellet tube unit. Piped effluent (Outfall 01A inside the facility) enters an open vertical concrete pipe then mixes with the effluent flow from the High School WWTP before discharging to the Rio Grande at Outfall 001.

High School

The High School WWTP was constructed in 1993 to accommodate increased flow at this facility. The design flow at this treatment plant is 55,000 gallons per day. The collection system includes 3 lift stations with alarm lights. Raw wastewater from the High School (approximately 2,070 students and faculty), cafeteria, vehicle shop, biology lab, chemical lab, and an on-site caretaker residence enters the plant via a lift station and passes through a static screen for solids removal. Similar to the Middle School WWTP, screenings are placed in buckets and allowed to dry for final disposal at municipal solid waste landfill in Sunland Park, New Mexico.

After the lift stations and screen, wastewater then enters an aeration basin. Aeration is provided by two blowers. The blowers provide lift for the RAS to be moved on a continuous basis back to the aeration basin. A diesel generator mounted on a trailer is located at the High School WWTP. Gadsden ISD has a contract for preventative maintenance and exercises the generator once each quarter.

Flow from the aeration basin enters a rectangular clarifier basin. Flow is measured after the clarifier before the chlorine contact chamber using a V-notch weir and ultrasonic transducer device. The weir is located in an open channel box and the transducer is located upstream of the weir. An automatic ISCO 4210 Ultrasonic Flow Meter was mounted in the pump and blower control room and displayed instantaneous flow rate, time, totalized flow and head measurement.

After measurement, flow passes through a chlorine pellet tube unit and then drops into a wet well. The chlorine contact chamber acts also as a lift station to pump treated effluent to the outfall line at the Middle School WWTP. Effluent is pumped in batches through a pipe to the Middle School WWTP. De-chlorination (Sodium sulfite) is accomplished when the effluent reaches the Middle School WWTP through a pellet unit. After de-chlorination, effluent (Outfall 01B inside the facility) enters the previously discussed open vertical concrete pipe then mixes with the effluent flow from the Middle School WWTP before discharging to the Rio Grande at Outfall 001.

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Sludge Management

Biosolids produced at the treatment plants are pumped out of the clarifiers on a monthly basis and transported by a contracted septic tank and cesspool service to the Doña Ana County South Central Regional WWTF.

Further Explanations

Section B – Recordkeeping and Reporting: “Unsatisfactory”

Section F – Laboratory: “Unsatisfactory”

Part I.A.1 (Effluent Limitations and Monitoring Requirements, Outfall 001) of the permit requires pH, TRC and E.coli bacteria effluent monitoring at a frequency of once/month and grab sample type representative of final effluent prior to the discharge into the receiving stream.

Part III.C.4 (Standard Conditions, Record Contents) of the permit states:

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.*

Part III.C.5 (Standard Conditions, Monitoring Procedures) of the permit requires:

- 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.*

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Part III.D.4 (Standard Conditions, Discharge Monitoring Reports and Other Reports) of the permit states:

“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.”

Finding

- Based on reviewed laboratory reports and chain of custody forms, pH results reported on DMRs did not conform to sample holding times in 40 CFR 136.3, in this case within 15 minutes of sample collection. The reviewed chain of custody form indicates that the time to transport samples from the facility to a commercial laboratory in Las Cruces exceeds 15 minutes. **This is a repeat finding of the August 2010 inspection.**
- Per 40 CFR 136.3 holding time for E Coli is 6 hours. The reviewed chain of custody form and lab results form does not have required time of analysis. It cannot be confirmed the holding time requirement has been met. The above permit requirement of having this documented has not been met.
- The permit requires testing for and reporting TRC once a month. The chlorine meter reads samples in mg/l the reporting requirement is in ug/l. It does not appear the conversion from mg/l to ug/l was always completed before reporting the information on DMR’s. The listed MQL for TRC in the permit is 100 µg/L.

1 milligram = 1,000 microgram

- The permit has a mass loading requirement for BOD and TSS. Reviewing past DMR’s and bench sheets the calculation used to get the reportable loading was not performed correctly. The MGD values used in the calculation were the monthly averages not the flow on the day of sampling. **This is a repeat finding of the August 2010 inspection and the May2008 inspection.**

BOD (mg/l) x MGD (Day of Sampling) x 8.34 = loading (lbs/day)

TSS (mg/l) x MGD (Day of Sampling) x 8.34 = Load (lbs/day)

- The values reported for daily maximum flow were the monthly averages. **This is a repeat finding of the August 2010 inspection and the May2008 inspection.**

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2. Internal Outfalls 01A and 01B

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the permittee is authorized to discharge from internal outfall serial number 01A and 01B. Such discharges shall be limited and monitored by the permittee as specified below:

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.	7-Day Avg.		
Flow ⁽¹⁾ STORET: 50050	N/A	N/A	N/A	N/A	Daily	Estimate
Biochemical Oxygen Demand (BOD ₅) STORET: 00310	22.5 ⁽¹⁾	N/A	30	45	One/Month	Grab
Total Suspended Solids (TSS) STORET: 00530	22.5 ⁽¹⁾	N/A	30	45	One/Month	Grab

Samples shall be taken at the discharge from the final treatment unit of each plant prior to the comingling of two waste streams from the following approximate locations: Internal Outfalls 01A and 01B.

FOOTNOTE:

1. Combined load of effluents at 01A and 01B shall not exceed 22.5 ponds per day.

Section C – Operations and Maintenance: “Unsatisfactory”

The permit requires, in Part III, Section 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.

Finding

- The WWTP at the High School clarifier has developed substantial short circuiting around the weir teeth in the final clarifier, (see photo 1). **This is a repeat finding of the May 2008 Inspection.**
- Operators have no basis for the times aeration units are kept running or if there is enough O₂ present to keep the biological organisms alive. Having and using an O₂ meter is a basic tool in running a WWTP.

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- According to Operator Certification Regulations (20.7.4.12 NMAC) the systems used at the Gadsden Independent School District are required to have a level 3 wastewater operator. Mr. Sanchez who holds a Level III Certification said he will be retiring shortly. Mr. Apadoca holds a Level II Certification and will not meet the above requirement.

Section C – Flow Measurement: “Unsatisfactory”

Part III, Section C. of the permit states:

“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.”

Finding

To measure flow at the middle school a v-notch weir is used with an Isco Signature Flow Meter. New meters were installed after the last inspection. The bottom of the weir at this facility is more like a Trapezoid than a v-notch, (see Photo 2). Per the Isco Open Channel Flow Measurement Handbook the thickness of the weir should be less than 1/8 inch. The Inspector was unable to measure the thickness of the weir due to the location however it appeared to exceed this thickness.

During the facility review at one point very little water was flowing through the v-weir. The discharge then increased however the meter did not read this increase. The meter needs to be calibrated to determine if the weir is the problem or the meter needs to be adjusted. **This is a repeat finding of the August 2010 inspection.**

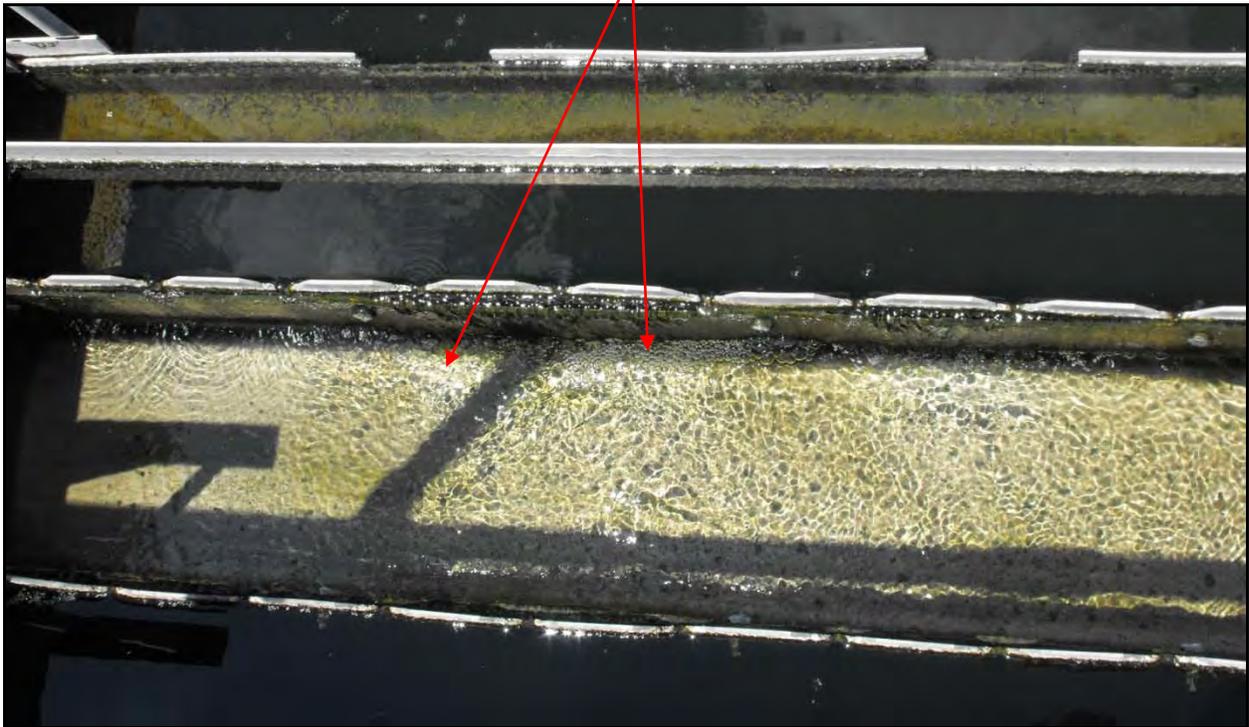
NMED/SWQB

Official Photograph Log

Photo # 1

Photographer: Daniel Valenta	Date: 7/12/2012	Time: 1133 hours
City/County: Anthony/Dona Ana		
Location: Gadsden Independent School District #16 High School WWTP		
Subject: Clarifier unit needs to be adjusted or repaired.		

Short Circuiting



NMED/SWQB

Official Photograph Log

Photo # 2

Photographer: Daniel Valenta	Date: 7/12/2012	Time: 1005 hours
City/County: Anthony/Dona Ana		
Location: Gadsden Independent School District #16 Middle School WWTP		
Subject: V-notch weir damaged.		

