



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

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DAVE MARTIN
Secretary

RAJ SOLOMON, P.E.
Deputy Secretary

Certified Mail - Return Receipt Requested

June 24, 2011

Mr. Bill McCuaig, Executive Director
Sacramento Methodist Assembly
Post Office Box 8
Sacramento, New Mexico 88347-008

RE: Minor Non-Municipal, NPDES Compliance Evaluation Inspection, Sacramento Methodist Assembly, NPDES Permit No. NM0028886, June 21, 2011

Dear Mr. McCuaig:

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.

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 of Records/Reports, Operations/Maintenance, Self-Monitoring, Flow Measurements and Receiving/Effluent. 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)
Suite 1200
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) 827-1041 or sandra.gabaldon@state.nm.us

Sincerely,
/s/ Sandra Gabaldon

Sandra Gabaldón
Surface Water Quality Bureau

Cc: Marcia Gail Adams, EPA, Enforcement Section (6EN-AS) by e-mail
Larry Giglio, EPA (6EN-P) by e-mail
Carol Peters-Wagnon, EPA (6EN-WM) by e-mail
Diana McDonald, EPA (6EN-WM) by e-mail
Samual Tates, EPA, (6W-AS) by e-mail
NMED District III Manager (Roswell) 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 | 8 | 8 | 8 | 6 | 11 | 12 | 1 | 1 | 0 | 6 | 2 | 1 | 17 | 18 | C | 19 | S | 20 | 2 | |
| Remarks | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| M I N O R N O N M U N I C I P A L | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Inspection Work Days | | | | | | Facility Evaluation Rating | | | | | | BI | | QA | | Reserved | | | | | | | | | | | | | |
| 67 | | | | | | 70 | 2 | | | | | | | 71 | N | 72 | N | 73 | | | | | | | | | | | 80 |

Section B: Facility Data

| | | | |
|--|--|---|---|
| Name and Location of Facility Inspected <i>(For industrial users discharging to POTW, also include POTW name and NPDES permit number)</i> SACRAMENTO METHODIST ASSEMBLY – 285 South, to US 54, East on US 82 to South NM24. Follow signs to Sacramento Methodist Assembly. OTERO COUNTY | | Entry Time /Date 1300 HOURS / 06-21-2011 | Permit Effective Date January 1, 2007 |
| | | Exit Time/Date 1445 hours / 06-21-2011 | Permit Expiration Date December 30, 2011 |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Tracy Mimms, Operator / 575-687-3414 | | Other Facility Data | |
| Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Bill McCuaig, Executive Director / 575-687-3414 / 575-687-4219 PO Box 8 Sacramento, NM 88347-0008 | | SIC 4952 LAT 32 47 24.23 N LONG -105 33 34.74 W | |
| | | Contacted Yes <input type="checkbox"/> No <input type="checkbox"/> * | |

Section C: Areas Evaluated During Inspection

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

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

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

1. PLEASE SEE CHECKLIST AND FURTHER EXPLANATIONS

| | | |
|---|--|-----------------------|
| Name(s) and Signature(s) of Inspector(s) SANDRA GABALDON /s/ Sandra Gabaldon | Agency/Office/Telephone/Fax NMED/SWQB 505 827-1041/505-827-0160 | Date June 24, 2011 |
| Signature of Management QA Reviewer RICHARD E. POWELL /s/ Richard E. Powell | Agency/Office/Phone and Fax Numbers 505-827-2798 | Date June 24, 2011 |

SECTION A - PERMIT VERIFICATION – EPA CURRENTLY WORKING ON RENEWAL PERMIT FOR SANTA ROSA WWTP.

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: See further explanations

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

Operator unable to locate operation and maintenance manual, SOPs, or emergency procedures. Operator states written copies are maintained.

SACRAMENTO METHODIST ASSEMBLY

PERMIT NO. NM0028886

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. Grab samples required in 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
No COCs provided. Unable to confirm preservation techniques (temp. <6°C)
- c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3 Y N NA
Unable to confirm holding times for TRC.
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 4" Palmer Bowlus Flume
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. Y N NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. Y N NA
4. CALIBRATION FREQUENCY ADEQUATE. 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 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. FOR ALL PARAMETERS EXCEPT pH AND CHLORINE Y N NA

6. SPIKED SAMPLES ARE ANALYZED. 0 % OF THE TIME. Y N NA

7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME Diagnostic & Technology Center, Inc

LAB ADDRESS 2420-B N. White Sands Boulevard; Alamogordo, NM 88310-6114

PARAMETERS PERFORMED TSS, BOD, e.Coli

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 |
|-------------|-----------|--------|-----------|--------------|------------|-------|-------|
| 001 | NO | NO | NO | NO | NO | CLEAR | |
| | | | | | | | |
| | | | | | | | |

RECEIVING WATER OBSERVATIONS

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED NO).
 DETAILS:

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

Sacramento Methodist Assembly
Compliance Evaluation Inspection
NPDES Permit No. NM 0028886
June 21, 2011

Introduction

A compliance evaluation inspection (CEI) was conducted at the Sacramento Methodist Assembly Wastewater Treatment Plant (WWTP) on June 21, 2011 by Sandra Gabaldón of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). 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. The enclosed inspection report is based on verbal information provided by the permittee's representative, Mr. Tracy Mimms, observations made by the NMED inspectors, and a review of records maintained by the permittee and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative further explanations section of the report.

The Sacramento Methodist Assembly (SMA) is classified as a minor private domestic discharger with a design flow of 0.042 million gallons a day (MGD) and is assigned NPDES permit number NM0028886. The discharge from the WWTP enters an unnamed intermittent stream, thence to the Agua Chiquita, thence to the Rio Penasco, thence to the Pecos River in segment 20.6.4.208 NMAC of the Pecos River Basin (*State of New Mexico Standards for Interstate and Intrastate Surface Water 20.6.4 NMAC*). The designated uses for this segment include: fish culture, irrigation, livestock watering, wildlife habitat, coldwater aquatic life and primary contact.

Ms. Gabaldón arrived at the facility at the facility at 1300 hours on June 21, 2011. Ms. Gabaldón presented her credentials to Mr. Tracy Mimms, operator, and explained the purpose of the inspection. An exit conference was held with Mr. Mimms on this date to discuss preliminary findings of this inspection.

Treatment Scheme

The SMA WWTP is a complete mix, extended aeration package plant with chlorination/dechlorination disinfection. The plant consists of four reactor tanks that operate in series with four accessible surface ports per tank. The reactors include aeration diffusers and double sided weirs. Two-thirds of the reactor is dedicated to aeration and the remaining portion functions as a clarifier. The blowers alternate on pre-programmed cycles. The plant has a two day detention time for a total volume capacity of 76,000 gallons. Peak flow periods typically occur in the morning from 7:30 to 9:30 AM.

Following treatment in the reactors, wastewater flows into a chlorine contact chamber with chlorine tablets situated in vertical canisters. Dechlorination occurs in a tank located below the chlorination chamber.

Sludge Management

Sludge is removed directly from the treatment plant yearly by a private septage hauler for offsite disposal.

Sacramento Methodist Assembly
Compliance Evaluation Inspection
NPDES Permit No. NM 0028886
June 21, 2011

Further Explanations

Section B – Recordkeeping and Reporting Evaluation: Overall rating of “Marginal”

The permit requires, in Part III, Section D.4., Monitoring and Records:

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 II.D.11 and all other reports required by Part III.D. to the EPA. Duplicate copies of DMR’s and all other reports shall be submitted to the New Mexico Environment Department.

The permit requires, in Part III, Section C.4, Monitoring and Records:

Records of monitoring information shall include:

- a. The date, exact place, and time of sampling or measurement;*
- 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 Section B – Recordkeeping and Reporting:

The permittee has failed to submit Discharge Monitoring Reports (DMRs) since December 2010. The operator stated that he submitted the first six months of 2011 last week to EPA. As yet, we have not received any DMRs at NMED.

The operator provided analytical benchsheets from their contract laboratory, Diagnostic & Technology Center, Inc. There are no corresponding chain of custody (COC) records provided with these benchsheets. The primary objective of the COC is to create an accurate written record that can be used to trace the possession and handling of the sample from the moment of its collection through its analysis.

The permittee does pH and total residual chlorine (TRC) onsite. The pH benchsheet lacks the analytical method being used (e.g., Standard Methods 4500-H+ B). The permittee is recording the analytical results for TRC only. There is no formatted benchsheet provided for TRC which records the date, exact place and time of sampling, individual performing sample, date and time of analysis, individual performing analysis, or analytical technique being used.

There are no maintenance records available that indicate preventive maintenance being performed on either the chlorine or pH meter.

Section C – Operations and Maintenance: Overall rating of “Unsatisfactory”

Permit requirements, 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 the 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 include adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities similar systems which are installed by a permittee only with 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 Operations and Maintenance:

The permittee has only one certified operator onsite. It is suggested that there be two certified operators onsite to allow for instances when one operator is out ill, on vacation or an unexpected emergency.

The permittee has no standby power available.

The permittee has no alarm system for power or equipment failures.

Section E – Flow Measurements: Overall rating of “Marginal”

The permit requires in Part III. C. 6: Flow Measurement

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.

The operator had no calibration records available from an outside representative. EPA recommends that calibration of all flow measurement devices performed annually.

Section F – Laboratory: Overall rating of “Marginal”

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.*

The contract laboratory recorded the TSS and BOD₅ methods as EPA 160.2 and EPA 405.1, respectively. These methods were withdrawn from 40 CFR 136 March 12, 2007. The contract laboratory is required to conduct test procedures approved under 40 CFR 136. Standard Methods 2540 D (TSS) and 5210 B (BOD) are both approved methods for compliance reporting.

The inspector asked the operator to explain the sampling and analysis he does for pH and TRC. He correctly did the TRC, however, the operator is not following the correct methodology for pH. He is using three buffers, 7.0, 10.0 and 4.0. He is calibrating his meter with all three rather than bracketing his expected pH (~7.8) with 7.0 and 10.0, and checking his meter against buffer 4.0. The inspector suggested that he review the method to familiarize himself with the correct procedure of analyzing his pH for compliance reporting.