



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Surface Water Quality Bureau

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RYAN FLYNN
Cabinet Secretary-Designate

BUTCH TONGATE
Deputy Secretary

ERIKA SCHWENDER
Director

Certified Mail - Return Receipt Requested

August 6, 2013

Mr. Bill McCain, Executive Director
Sacramento Methodist Assembly
P.O. Box 8
Sacramento, NM 88347-0008

**Re: Minor Non-Municipal; SIC 4952; Sacramento Methodist Assembly; NPDES Compliance
Evaluation Inspection; NM0028886; July 11, 2013**

Dear Mr. McCain:

Enclosed please find a copy of the report and check list for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the Federal Clean Water Act.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the Further Explanations section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

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

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

Sacramento Methodist Assembly
NPDES CEI Permit NM0028886

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
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
Jan Walker, USEPA (6EN) by e-mail
NMED District III, Frank Ford 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 3 0 7 1 1 17 18 C 19 S 20 2					
Remarks					
M I N O R W W T P C O N F E R E N C E C E N T E R					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 1 69	70 2	71 N	72 N	73	74 75 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) Sacramento Methodist Assembly Retreat & Conference Center, Sacramento, NM – US54 to just north of Alamogordo, East on US82 to Mayhill, South on NM24, West on NM521 to Sacramento, follow signs to center on South side of 521, WWTP on left side of entrance road just below main building. Otero County	Entry Time /Date 1010/July 11, 2013	Permit Effective Date July 1, 2013
	Exit Time/Date 1231/July 11, 2013	Permit Expiration Date June 30, 2018
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Randy Bruggtink/Operator/575-687-3414 Mr. Bill McCuaig/Excutive Director/575-687-3414/fax 575-687-4219	Other Facility Data LAT 32 47 24.23 N LONG -105 33 34.74W SIC 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Bill McCuaig/Excitve Director/575-687-3414/fax 575-687-4219 Sacramento Methodist Assembly Retreat & Conference Center P.O. Box 8, Sacramento, NM 88347-0008	Contacted Yes <input checked="" 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	S	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	S	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	U	Laboratory	N	Storm Water		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	Date 8/7/2013
Signature of Management QA Reviewer BRUCE YURDIN /s/Bruce Yurdin	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2795	Date 8/7/2013

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U NA (FURTHER EXPLANATION ATTACHED *no.*)
 DETAILS: **New permit arrived on day of inspection.**

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

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 *no.*)
 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
PERSONNEL PASS THE PACKAGE PLANT SEVERAL TIMES A DAY AND CAN HEAR IF POWER IS OFF

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. **FACILITY IS SO OLD MANUALS ARE NOT 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

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 **3 INCH PALMER-BOWLUS FLUME & GREYLINE ULTRASONIC FLOW METER SLT 32**

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. **FLOW METER HAS NEVER BEEN CALIBRATED**

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. 0 % OF THE TIME. 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 Blvd, Alamogordo, NM 88310-6114
 PARAMETERS PERFORMED TSS, BOD, E-Coli, Fecal

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: **WHEN NEEDED A PRIVATE SLUDGE HAULER IS CONTRACTED TO TAKE THE SLUDGE TO RUIDOSO 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

**Sacramento Methodist Assembly WWTP
NPDES Permit NM0028886
Compliance Evaluation Inspection
July 11, 2013**

Introduction

A Compliance Evaluation Inspection (CEI) was conducted at the Sacramento Methodist Assembly Retreat & Conference Center Wastewater Treatment Plant (SMA WWTP) located in Sacramento, New Mexico on July 11, 2013 by Mr. Daniel Valenta of the New Mexico Environmental Department (NMED), Surface Water Quality Bureau (SWQB). This facility is classified as a minor industrial discharger under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program, and is assigned the NPDES permit number NM0028886. The facility design flow is 0.042 million gallons per day (MGD).

The SMA WWTP discharges into an intermittent unclassified water of the state 20.6.4.98 and 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 dated November 2012). The designated uses in 20.6.4.98 NMAC are livestock watering, wildlife habitat, marginal warmwater aquatic life and primary contact.

The inspector arrived at the SMA center building at 1010 and was met by Ms. Lorain Garner who was the secondary contact for the WWTP. The inspector made introductions, presented his credentials, and discussed the purpose of the inspection. The primary operator, Mr. Randy Brugtink was not present. He was contacted by phone and interview concerning the operation of the facility and sampling and test methods. An exit interview to discuss preliminary findings of the inspection was conducted at the SMA at 1231 hours with Ms. Lorain Garner and Executive Director Mr. Bill McCuaig.

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 inspectors, and records and reports kept by the permittee and/or NMED.

Treatment Scheme

The SMA WWTP is a complete-mix, extended aeration package plant (Sanilogical Model) with chlorination/dechlorination capability. 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 a pre-programmed cycle. The plant has a two-day detention time for a total volume capacity of 76,000 gallons.

Sacramento Methodist Assembly WWTP
NPDES Permit NM0028886
Compliance Evaluation Inspection
July 11, 2013

Following treatment in the reactors, wastewater flows into a chlorine contact chamber with chlorine tablets situated in vertical canisters. Dechlorination is provided by diphosphorus tablets in canisters set-up in a tank below the chlorine chamber. Both types of tablets are manually replaced as needed.

A 3 inch Palmer-Bowlus flume and Greyline ultrasonic flow meter SLT 32 were installed at outfall 001 in July 2005. The outfall pipe is a 4" PVC type located below the dechlorination tank and discharges directly into an unnamed tributary to the Agua Chiquita. According to the operator, the source of the flow in the tributary is several springs. The Agua Chiquita is located approximately ½ mile below Outfall 001 and the effluent may percolate into the ground before reaching it.

Sludge Management

Sludge is removed directly from the treatment plant on an as-needed basis by a private septage hauler for off-site disposal.

**Sacramento Methodist Assemble WWTP
 NPDES Permit NM0028886
 Compliance Evaluation Inspection
 July 11, 2013**

Section B - Recordkeeping and Reporting Evaluation – Overall Rating of “U = Unsatisfactory”

Section F – Laboratory – Overall Rating of “U = Unsatisfactory”

Permit Requirements for Self-Monitoring and Laboratory

Part III.B.3.a (Standard Conditions, Proper Operation and Maintenance) of the permit states, *“Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.”*

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

- 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.*

Part III, Section C.5.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.”*

Part I, Section A, LIMITATIONS AND MONITORING REQUIREMENTS:

2007 Permit Requirements

<i>Pollutant</i>	<i>Minimum</i>	<i>Maximum</i>	<i>Frequency</i>	<i>Sample Type</i>
<i>TRC</i>	<i>n/a</i>	<i>11 ug/l</i>	<i>Five/Week</i>	<i>Instantaneous Grab</i>

**Sacramento Methodist Assemble WWTP
NPDES Permit NM0028886
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July 11, 2013**

	<i>30 Day Ave</i>	<i>Daily Maximum</i>	<i>7-Day Ave</i>	<i>Frequency</i>
<i>Flow</i>	<i>Report MGD</i>	<i>Report MGD</i>	<i>Report MGD</i>	<i>Daily Average</i>

	<i>30 Day Ave</i>	<i>Daily Maximum</i>	<i>Frequency</i>	<i>Sample Type</i>
<i>E. coli</i>	<i>126</i>	<i>410</i>	<i>Once/Month</i>	<i>Grab</i>

2013 Permit Requirements

	<i>30 Day Ave</i>	<i>Daily Maximum</i>	<i>Frequency</i>	<i>Sample Type</i>
<i>E. coli</i>	<i>206</i>	<i>940</i>	<i>Once/Month</i>	<i>Grab</i>

Part III, Section B.3.a, PROPER OPERATION AND MAINTENANCE: *“Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.”*

Part III, Section C.5.c, MONITORING PROCEDURES: *“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”.*

Finding

The new permit was received at the facility on the day of the inspection. The permit has some new reporting requirements that are now are being incorporated into the daily SOP's.

- The facility uses chlorine and dechlorination for the final treatment before discharging. The permit requires testing for TRC five times a week. The chlorine meter reports sample measurements in mg/l the reporting requirement in the permit is in ug/l. After speaking to the operator concerning the chlorine meter it appears the conversion from mg/l to ug/l was not completed before reporting the information on DMR's, see attached spreadsheet. TRC values on the spreadsheet have been converted to ug/l. The listed MQL for TRC is 33µg/L. The dechlorination tank which holds the dechlorine tubes was checked. They were all empty except the small piece shown, see photo 1.

$$1 \text{ mg} = 1,000 \text{ ug}$$

- It is not documented that sample collection procedures are adequate for bacteria monitoring. As previously discussed, there is a potential for chlorine to be in the effluent. Preservation requirements in Table IA-Bacterial Tests of 40 CFR 136.3 states, *“Add a reducing agent only if an oxidant (e.g., chlorine) is present.”* Proper preservation techniques, in this case 0.0008% Na₂S₂O₃ to de-chlorinate the sample, were not documented on reviewed records.

**Sacramento Methodist Assembly WWTP
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- The permit requires a daily average flow measurement. With these daily averages the 30-day average, monthly maximum flow, and highest 7 day average is calculated. However the only flow measurement reported is the monthly average, see attached spreadsheet.

USEPA Region 6 NPDES Reporting Requirements Handbook states:

***How do I calculate and report 7-day averages?** We recognize that calendar weeks and calendar months rarely coincide. Therefore, for the purpose of calculating and reporting 7-day averages, you should follow the process below: a. Define your week (SUN-SAT, MON-SUN, etc.). b. Calculate the averages of all sample data obtained for each week. c. The highest calculated weekly average will be reported on the DMR for the month in which (1) the week ends or (2) the week begins, or (3) the month which contains the greatest number of days. It is the choice of the facility. However, the choice should be consistent month to month, year to year. SET A RULE AND STICK WITH IT.*

- 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.

$$\begin{aligned} \text{BOD (mg/l)} \times \text{MGD (Day of Sampling)} \times 8.34 &= \text{loading (lbs/day)} \\ \text{TSS (mg/l)} \times \text{MGD (Day of Sampling)} \times 8.34 &= \text{Load (lbs/day)} \end{aligned}$$

- Under the 2007 permit limits the facility exceeded the E-coli limit the months of:

November 2012
December 2012
February 2012
July 2011

- Duplicate samples have not been collected at the SMA wastewater facility. An adequate quality assurance-quality control (QA/QC) program should include a minimum of 10% duplicate sample analyses frequency for all parameters. In the case of the SMA permit where once per month sampling is required, a duplicate or second sample should be collected at least every ten months for BOD, TSS, Fecal, pH, and TRC

Section E - Flow Measurement – Overall Rating of “M= Marginal”

Permit Requirements for Flow Measurement

Part III, Section C.5.b of the permit states:

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.

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Part III, Section C.6 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.

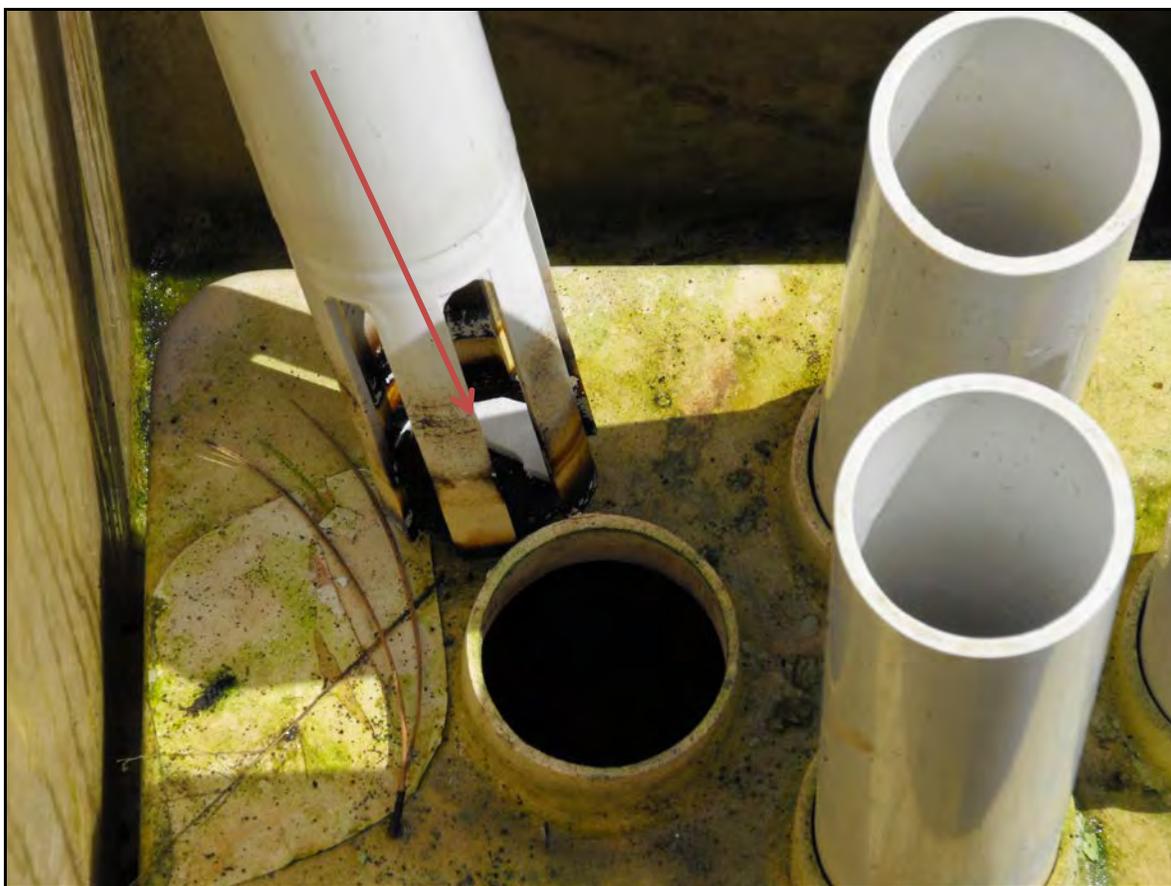
Findings for Flow Measurement

There were no flow measurement calibration records or other measurements to verify accuracy and reliability available. Flow measurement accuracy is important because this information is used to calculate BOD5 and TSS mass loading calculations. USEPA's NPDES Inspection Manual, Chapter 6 states, "The facility must ensure that their flow measurement systems are calibrated by a qualified source at least once a year to ensure their accuracy."

**NMED/SWQB
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: 7/11/2013	Time: 1045 hours
City/County: Sacramento/Otero County		
Location:	Sacrament Methodist Assembly	
Subject:	Lack of declorine tablets in tubes allows chlolorinated water to be released. The other tubes are empty.	



**NMED/SWQB
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 7/11/2013	Time: 1039 hours
City/County: Sacramento/Otero County		
Location: Sacrament Methodist Assembly		
Subject: Below ground aeration and treatment system.		



United Methodist Camp NM0028886

Date	BOD	BOD	BOD	BOD	pH	pH	TSS	TSS	TSS	TSS	Q	Q	TRC	E-Coli	E-Coli	Fecal	Fecal
	lbs/day	lbs/day	mg/l	mg/l			lbs/day	lbs/day	mg/l	mg/l	MGD	Gal per Day	ug/l	cfu	cfu	cfu	cfu
	30 Day Ave	7 Day Ave	30 Day Ave	7 Day Ave	Min	Max	30 day Ave	7 Day Ave	30 Day Ave	7 Day Ave	30 Day Ave	7 Day Ave	Daily Max	100 ml	100 ml	30 Day Ave	Daily Max
	10.50	15.80	30.00	45.00	6.6	8.8	10.5	15.8	30.0	45.0	same	same	11	126	410	200	400
3/1/13	0.51	0.51	11.00	11.00	8.37	8.37	0.23	0.23	5.00	5.00	0.0062	0.0062	60.0	39.9	39.9	n/a	n/a
2/1/13	2.12	2.12	16.00	16.00	8.17	8.17	1.33	1.33	10.00	10.00	0.0070	0.0070	50.0	55.4	55.4	n/a	n/a
1/1/13	0.69	0.69	13.00	13.00	8.40	8.40	0.56	0.56	10.50	10.50	0.0032	0.0032	60.0	32.3	32.3	n/a	n/a
12/1/12	0.14	0.14	6.00	6.00	8.35	8.35	0.07	0.07	3.00	3.00	0.0032	0.0032	80.0	52.9	52.9	n/a	
11/1/12	0.21	0.21	8.00	8.00	8.29	8.29	0.12	0.12	4.50	4.50	0.0042	0.0042	70.0	228.3	228.3	n/a	
10/1/12	0.17	0.17	6.00	6.00	8.15	8.15	0.20	0.20	7.00	7.00	0.0034	0.0034	0.0	131.4	131.4	n/a	
9/1/12	0.54	0.54	9.00	9.00	7.75	7.75	0.39	0.39	6.50	6.50	0.0063	0.0063	70.0	3.1	3.1		
8/1/12	0.35	0.35	14.00	14.00	7.80	7.80	0.45	0.45	18.00	18.00	0.0050	0.0050	0.0	21.1	21.1		
7/1/12	0.54	0.54	9.00	9.00	7.75	7.75	0.39	0.39	6.50	6.50	0.0063	0.0063	70.0	3.1	3.1		
6/1/12	0.07	0.07	2.50	2.50	7.66	7.66	0.06	0.06	7.00	7.00	0.0039	0.0039	40.0	31.3	31.3		
5/1/12	0.22	0.22	7.00	7.00	7.70	7.70	0.20	0.20	6.50	6.50	0.0044	0.0044	50.0	7.4	7.4		
4/1/12	0.07	0.07	2.50	2.50	7.66	7.66	0.06	0.06	7.00	7.00	0.0039	0.0039	40.0	31.3	31.3		
3/1/12	0.23	0.23	9.00	9.00	7.61	7.61	0.18	0.18	5.50	5.50	0.0046	0.0046	0.0	4.1	4.1		
2/1/12	0.73	0.73	15.00	15.00	7.62	7.62	1.14	1.14	23.50	23.50	0.0053	0.0053	40.0	210.5	210.5		
1/1/12	0.02	0.02	3.00	3.00	7.79	7.79	0.02	0.02	4.00	4.00	0.0007	0.0007	70.0	<1.0	<1.0		
12/1/11	0.46	0.46	7.00	7.00	missing	missing	0.66	0.66	10.00	10.00	0.0058	0.0058	90.0	74.8	74.8		
11/1/11	0.11	0.11	2.00	2.00	7.77	7.77	0.17	0.17	3.00	3.00	0.0067	0.0067	80.0	<1.0	<1.0		
10/1/11	0.35	0.34	6.00	6.00	7.82	7.82	0.45	0.45	8.00	8.00	0.0068	0.0068	90.0	21.3	21.3		
9/1/11	0.20	0.20	6.00	6.00	7.76	7.76	0.18	0.18	5.50	5.50	0.0025	0.0025	80.0	<1	<1		
8/1/11	0.13	0.13	4.00	4.00	7.57	7.57	0.21	0.21	6.50	6.50	0.0009	0.0009	90.0	<1	<1		
7/1/11	0.26	0.26	8.00	8.00	7.58	7.58	0.06	0.06	2.00	2.00	0.0017	0.0017	90.0	344.8	344.8		