NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

DAVE MARTIN
Secretary

BUTCH TONGATE
Acting Deputy Secretary

Certified Mail – Return Receipt Requested

August 12, 2011

The Honorable Martin Resendiz, Mayor
Village of Sunland Park
P. O. Box 470
3800 McNutt Road
Sunland Park, New Mexico 88063

Re: Major-Municipal; SIC 4952; NPDES Compliance Evaluation; City of Sunland Park Waste Water Treatment Plant; NM0029483; July 12, 2011

Dear Mr. Resendiz:

Enclosed, please find a copy of the report and checklist 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 Recordkeeping and Reporting, Operation and Maintenance, Flow Measurement, Laboratory, and Effluent/Receiving Waters Observations. 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

I wish to thank you for the cooperation extended the NMED personnel while at the Sunland Park Wastewater Treatment Plant. If you have any questions about this inspection report, please contact me at (505) 647-7981

Sincerely:

/s/ Steven M. Baumgarn

Steven M. Baumgarn
Environmental Scientist/Specialist
Surface Water Quality Bureau

cc: NMED District III, District Manager
Samuel Tates (6EN-AS) Sent Electronically
Carol Peters-Wagnon (6EN-WM) Sent Electronically
Marcia Adams (6EN-AS) Sent Electronically
Larry Giglio (6WQ-PT) Sent Electronically
Diana McDonald (6EN-AS) Sent Electronically
Kurt Moffatt, 845 N. Motel Blvd, Las Cruces, NM 88007
Sue Padilla, 845 N. Motel Blvd, Las Cruces, NM 88007

EPA

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	12	yr/mo/day	17	18	Inspec. Type	19	Inspector	20	Fac Type
	N	5	NM0002948	3		110712			C		S		1

Remarks: MAJOR WWTP

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
				2		N		N					

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
CITY OF SUNLAND PARK WWTP LOCATED NE OF THE INTERSECTION OF MCNUTT ROAD AND SUNLAND PARK DRIVE, BEHIND CITY HALL AND CITY FIRE STATION AT 1000 MCNUTT ROAD, DONA ANA COUNTY, NEW MEXICO

Entry Time /Date
0900 HOURS 7/12/11

Permit Effective Date
10/1/07

Exit Time/Date
1230 HOURS 7/12/11

Permit Expiration Date
9/30/12

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
* FRANK LEMRA, OPERATOR
* JIAMIE REMERZ, OPERATOR
* LORENZO STEPHENSON, OPERATOR

Other Facility Data
LATITUDE
31° 47’ 34”

LONGITUDE
106° 33’ 24”

SIC 4952

Name, Address of Responsible Official/Title/Phone and Fax Number
MR. MARTIN RESENDIZ, MAYOR
1000 MCNUTT ROAD
SUNLAND PARK, NEW MEXICO 88063

Contacted
Yes [ ] No [*]

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Section C: Areas Evaluated During Inspection

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

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

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

SEE THE FURTHER EXPLANATIONS SECITON OF THE ATTACHED REPORT

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
STEVEN M. BAUMGARN */s/Steven M Baumgarn*	NMED/SWQB 575-647-7981	
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**

RICHARD POWELL **/s/*Richard Powell***	**NMED SWQB 505-827-2798**	

EPA Form 3560-3 (Rev. 9-94) Previous editions are obsolete.

City of Sunland Park Wastewater Treatment Plant
Compliance Evaluation Inspection
NM0029483
July 12, 2011

Narrative

Introduction

On July 12, 2011, a Compliance Evaluation Inspection (CEI) was conducted at the Sunland Park Wastewater Treatment Plant (WWTP) by Steven M. Baumgarn of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB), Point Source Regulation Section (PSRS). A certain number of CEIs are preformed on an annual basis for the U. S. Environmental Protection Agency (USEPA). The purpose of the inspection is to review compliance with the National Pollutant Discharge Elimination System (NPDES) permit.

Sunland Park is classified as a major municipal discharger under the federal Clean Water Act's Section 402 NPDES permit program and is assigned permit number NM0029438. The discharge is to the Rio Grande in stream segment 20.6.4.101 NMAC. This stream segment has the following designated uses: irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat, and primary contact. The inspection report, EPA Form 3460-3 and checklist are based on observations made by the inspector, record review, and information supplied by Sunland Park representatives.

The inspector arrived at Sunland Park Wastewater Treatment Plant at 0930 hours on July 12, 2011. He met with Frank Lemra, Jiame Ramerz, and Lorenzo Stephenson, Operators, showed credentials, and stated the purpose of the inspection. Mr. Kurt Moffatt, the contract Level IV operator from Dona Ana County was not available for this inspection Records and laboratory procedures were reviewed. An exit interview with all three operators took place at 1230 hours on July 12, 2011.

Treatment Scheme

Wastewater is pumped to the Sunland Park Wastewater Treatment Plant by eight lift stations. At the treatment plant a main lift station lifts the wastewater up to the treatment units. Influent then enters the entrance works which consists of an automatic bar screen with a manual backup, a grit chamber for grit removal and a classifier. Solids collected from the bar screen and grit chamber are disposed in the local landfill. The lift station is attached to an alarm system which protects against overflow problems. An additional lift station has been constructed near the Sunland Park North (Santa Teresa) Wastewater Treatment Plant, which is used to transport wastewater to the Sunland Park facility, for treatment.

The wastewater flow then enters the aeration basin. Air is provided by four blowers. Two blowers run continuously while one is resting and these units are alternated on a daily basis.

Return activated sludge is brought back to the aeration basin from the final clarifiers.

Wastewater then flows to two circular final clarifiers from the aeration basin. At the time of this inspection the units effluent looked relatively clear.

Contents of the final clarifier are discharged to the ultraviolet (UV) disinfection unit. The effluent proceeds through an effluent flow box. The effluent flow is measured using a 12 inch Parshall flume, an instantaneous flow meter and totalizer. Samples for NPDES permit monitoring are collected from this unit. The flow is then discharged via an underground pipe to the Rio Grande in Segment 20.6.4.101 NMAC of the Rio Grande Basin.

Sludge

Waste activated sludge is pumped to the sludge thickener and then to the four cell aerobic digester. Sludge from the digester is then pumped to the new belt filter press. Pressed sludge is place into a truck to be transported to the local landfill. The belt filter press is operated on a daily basis for approximately 4 hours. Presently the drying beds are used as a backup only for this facility in case the belt filter press goes down. A polymer is added to the sludge as it enters the belt filter press to allow for greater separation of the water and solids. Dried sludge is hauled to the local landfill where it is stockpiled and then mixed with cover dirt for disposal in the landfill. The sludge disposal site is restricted from public access.

SUNLAND PARK WWTP	PERMIT NO. NM0029483

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:NOTIFICATION OF MAXIMUM EXCURSIONS

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

SUNLAND PARK WWTP	PERMIT NO.NM0029483

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.	☒ Y ☐ N ☐ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	☒ Y ☐ N ☐ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	☒Y ☐ N ☐ NA
b) PROPER PRESERVATION TECHNIQUES USED.	☒ Y ☐ N ☐ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	☒Y ☐ N ☐ NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	☐ Y ☐ N ☒ NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☒ U ☐ NA *(FURTHER EXPLANATION ATTACHED YES)*
DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE	☒ Y ☐ N ☐ NA
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* 2/11)	☒ 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

SUNLAND PARK WWTP	PERMIT NO. NM0029483

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☒ S ☐ M ☐ U ☐ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. ☒ S ☐ M ☐ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. __ % OF THE TIME. ☐ Y ☒ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. __ % OF THE TIME. ☐ Y ☐ N ☒ NA

7. COMMERCIAL LABORATORY USED. ☒Y ☐ N ☐ NA

LAB NAME DOUG ROBY

LAB ADDRESS LAS CRUCES

PARAMETERS PERFORMED 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
001	NONE	NONE	NONE	NONE	NONE	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: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED NA).*

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

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Further Explanations

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

Recordkeeping and Reporting Requirements

The permit requires, in Part II, Section A, 24-Hour oral Reporting Daily Maximum Limitation Violations

> *Under the provisions of Part III.D.7.b.(3)of this permit, violations of daily maximum limitations for the following pollutants shall be reported orally to EPA Region 6, Compliance and Assurance Division, Water Enforcement Branch (6EN-W), Dallas, Texas, and concurrently to NMED within 24 hours from the time the permittee becomes aware of the violation followed by a written report in five days.*
>
> *E. coli bacteria*
> *Total residual chlorine*

Findings for Recordkeeping and Reporting Requirements

During the period of Discharge Monitoring Report (DMR) review for this inspection, (2009, 2010, and 2011) it was noted that there were 5 maximum excursions for E-coli bacteria. As indicated above the excursion needs to be reported to EPA and NMED within 24 hours of finding out about the excursion. E-coli bacteria samples are presently analyzed by a private laboratory. Often the actual written reports do not arrive at the treatment plant until many days later. Presently a violation report is attached to the DMR when it is submitted to EPA, but no verbal report is submitted to either EPA or NMED. It is recommended that the permittee ask the laboratory to contact them if an excursion of the maximum E-coli limit has been detected so the proper authorities (EPA and NMED) can be notified verbally. After verbal notification is made a written report needs to be submitted with 5 days to the same agencies. It should be noted that there were a number of groups and agencies collecting samples which include E-coli in the Lower Rio Grande and when they find a stream sample exceeding the Water Quality Standards, they often are looking for a cause. This notification process will help pinpoint the cause if it is due to the wastewater treatment plant.

Operation and Maintenance

Permit Requirements for Operation and Maintenance

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

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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.

Findings for Operation and Maintenance

As wastewater enters the wastewater treatment plant it passes through an area which is showing its age. This facility is over 30 years old and spalling and cracking, as well as, rust on metal works is beginning to be extensive. No through and through cracking was taking place. This area is near where the new line was installed prior to the last inspection. The permittee needs to look as the possibility of replacement in the near future.

At the time of this inspection it was noted that no grease ordinance was in place. There was substantial evidence of grease including shiny foam on the aeration basin and small grease balls located in the final clarifiers. A grease ordinance and enforcement program needs to be implemented to ensure that grease is removed at the source (ie: restaurants and other places of business) instead of being allowed to enter the treatment plant. Excessive grease can cause filamentous growth during the winter months which allow for insufficient settling and possible effluent violations at the outfall.

At the time of this inspection the final clarifiers had some pin floc going over the weirs. The operators indicated that this was a seasonal problem. During the early morning hours when the temperatures were low the pin floc appeared. By afternoon when the sun was shining and warming the water temperatures the effluent was much clearer and the pin floc had disappeared. The presence of the pin floc did not appear to have an effect on the final effluent total suspended solids concentration. Substantial filamentous growth of algae was also noted on the weirs and around the edges of the final clarifiers. The operators indicated that brushing of the final clarifiers weirs were cleaned every other day.

It is recommended that during months of high intensity sunshine this be done more frequently.

Housekeeping throughout the treatment plant needs to be improved. There are areas where pipes are laying on the ground and may cause a tripping problem for operators moving through the treatment plant. Dangerous situations such as this need to be eliminated as soon as possible and properly placed in storage.

Flow Measurement

Permit Requirements for Flow Measurement

The permit requires, in Part III, Section C.6, Flow Measurements

> *Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of 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 the 10% from true discharge rates throughout the range of expected discharge volumes.*

Findings for Flow Measurement

This facility uses a manufacturer representative to come in on an annual basis to calibrate the digital effluent flow readout device against the Parshall flume staff gage. This was last done in February 2011. During the rest of the year manual checks are not completed. It is recommended that an instantaneous check of the effluent flow readout device against the Parshall flume staff gage be completed periodically during the year to ensure that the readout device is within ±10% of the staff gage value. It is also recommended that a log book be kept to record these checks so that when inspectors visit the plant they can observe the frequency and technique employed to complete these checks.

Laboratory

Permit Requirements for Laboratory

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

> *Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.*

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The NPDES Permit Inspection Manual states in Section 7.D. Quality Assurance and Quality Control

In general, 10 percent of the samples should be duplicated.

Findings for Laboratory

The Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), and E-coli bacteria samples are being collected on a weekly basis for this facility. On alternate weeks samples are analyzed by Water Technology Associates (a private laboratory located in Las Cruces) and the Dona Ana County South Central Wastewater Treatment Plant (WWTP). Since Dona Ana County operates a number of facilities in Dona Ana County, they have been taking this opportunity to provide training in laboratory analysis techniques for staff at the Sunland Park WWTP. It was noted at the time of this inspection that duplicate samples were not being submitted to either of these laboratories. It is recommended, per EPA's inspection manual, that duplicate samples be collected and submitted approximately every 10 weeks to the laboratory for a duplicate analysis. This will greatly improve the quality assurance program at this facility.

Effluent/Receiving Waters Observations

Permit Requirements *for Effluent Limitations and Monitoring Requirements*

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

Effluent Characteristics	Discharge Limitations		
	30-day Avg.	7-day Avg.	Max
Biochemical Oxygen Demand (5-day)	30 mg/l	45 mg/l	
Total Suspended Solids	30 mg/l	45 mg/l	
E-coli Bacteria (colonies/100 ml)	126		410

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Findings *for Effluent Limitations and Monitoring Requirements*

As part of this inspection the Discharge Monitoring Reports (DMRs) for this facility were reviewed for the years 2009, 2010, and 2011 to determine if any excursions of the NPDES permit conditions had taken place (see the attached chart). The following is a list of the excursions during this period:

February 2009	*Maximum E-coli*
June 2009	*Maximum E-coli*
August 2009	*Maximum E-coli*
April 2011	*Maximum E-coli*
May 2011	*Maximum E-coli*

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DMR Review for 2009, 2010 and 2011

Date	BOD(mg/l)		TSS(mg/l)		E-Coli(org/100ml)	
	30d Ave	7d Ave	30d Ave	7d Ave	Ave	Max
01/09	4.3	6.1	5.7	9.7	9	127
02/09	4.78	9.8	4.75	6.6	4	610*
03/09	21.98	28.4	22.78	33.2	1	1
04/09	14.54	26.9	11.2	15	1	1
05/09	4.4	5.3	6.98	8.1	1	1
06/09	6.08	7.2	2.93	3.4	27	20000*
07/09	7.06	13.1	3.74	4.6	1	4
08/09	4.16	7.8	2.85	3.2	7	1600*
09/09	4.12	7.6	3.08	4.5	1	1
10/09	7.58	14.7	10.9	22.8	1	2
11/09	3.32	5.7	4.85	8.7	1	3
12/09	3.12	4.59	2.42	3.8	3	24
01/10	8.09	15	5.99	9.52	1	1
02/10	6.79	9.25	5.41	7.1	3	11
03/10	5.45	7.9	3.54	5.45	1	1
04/10	7.22	11.3	3.26	4.55	1	4
05/10	1.63	2.04	4.16	6	8	32
06/10	2.65	5.29	3.01	4.52	15	86
07/10	4.91	7.99	3.13	3.77	5	21
08/10	1.32	5.1	4.48	6.6	1	3
09/10	2.33	3.9	3.46	5.3	1	1
10/10	3.93	6.84	3.77	5.9	2	28
11/10	5.12	10.3	4.07	5.88	1	1
12/10	5.73	7	4.14	5.45	3	7
01/11	6.56	12.1	6.38	8.16	5	36
02/11	3.85	7.2	4.16	5.1	2	8
03/11	2.7	3.9	3.61	4.76	1	6
04/11	2.51	2.94	2.53	3.8	12	2700*
05/11	3.05	4.44	2	3.3	5	1500*
06/11	2.42	3.16	4.36	5.45	1	1
Permit Limits	30	45	30	45	126	410

* - Excursion of the NPDES permit limitations