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NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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Secretary

BUTCH TONGATE
Deputy Secretary

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

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 9, 2012

Mr. Dan Campbell
General Manager, Raton Water Works
P.O. Box 99
Raton, New Mexico 87740

Re: Minor Non-Municipal, SIC 4941, Raton Water Works Water Treatment Plant, NPDES Compliance Evaluation Inspection, NM0029891. August 6, 2012

Dear Mr. Campbell,

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.

Findings are based on the inspector's observances in regards to specific requirements of the NPDES permit. The Raton WWTP received an overall evaluation rating of "3" on a scale of 1 to 5. The main problems were found in the area of Operations & Maintenance, Self Monitoring and Effluent/Receiving Waters. Please refer to the Further Explanations section of the report for more detail.

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 USEPA (Diana McDonald, USEPA (6EN-WT), 1445 Ross Ave, Dallas, Texas, 75202) and NMED (at above address) regarding modifications and compliance schedules.

I wish to thank you for the cooperation extended to the NMED while at the Raton Water Treatment Plant. If you have any questions about this inspection report, please contact me at (505) 222-9587 or sarah.holcomb@state.nm.us.

Sincerely,
/s/ Sarah Holcomb
Sarah Holcomb
Surface Water Quality Bureau

Cc: Rashida Bowlin, USEPA (6EN-AS), by email
Larry Giglio, USEPA (6WQ-P) by email
Carol Peters-Wagnon, USEPA (6EN-AS), by email
Hannah Braning, USEPA (6EN-AS) by email
Diana McDonald, USEPA (6EN-AS), by email

Bob Italiano, NMED District II Manager, by email

EPA

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 9 8 9 1** 11 12	**1 2 0 8 0 6** 17 18	**C** 19	**S** 20	**2**

Remarks: **WATER TREATMENT PLANT**

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 **3**	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)*
RATON WATER TREATMENT PLANT, COLFAX COUNTY – FROM I-25, TAKE EXIT 454 AND MAKE A LEFT TURN AT THE STOP SIGN. FOLLOW ROAD FOR ABOUT 2 MILES. TURN LEFT ON STATE ROAD 72 AND WHERE THE ROAD FORKS, TURN LEFT ONTO N. 1ST ST. FOLLOW N. 1ST STREET TO PLANT.

Entry Time /Date
1455 HOURS/8-6-2012

Permit Effective Date
11-1-2010

Exit Time/Date
1540 HOURS/8-6-2012

Permit Expiration Date
10-31-2015

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
MR. LONNIE BACON, OPERATOR 4
MR. ANTHONY BUSTOS, OPERATOR 3

Other Facility Data

LAT N. 36° 55.158'
LONG W. -104° 25.946'

Name, Address of Responsible Official/Title/Phone and Fax Number
MR. DAN CAMPBELL, GENERAL MANAGER, RATON WATER WORKS
P.O. BOX 99, RATON, NM 87740
(575) 445-3861

Contacted
Yes * No

Section C: Areas Evaluated During Inspection

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

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

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

1. **THIS FACILITY HAS NOT DISCHARGED DURING THE TERM OF THIS PERMIT.**
2. **SEE REPORT FOR FURTHER EXPLANATIONS.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
SARAH HOLCOMB ***/s/ Sarah Holcomb***	**NMED/SWQB 222-9587 FAX 222-9510**	**8-9-2012**
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
RICHARD POWELL ***/s/ Richard Powell***	**NMED/SWQB 827-2798 FAX 827-0160**	**8-9-2012**

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

RATON WTP	PERMIT NO. NM0029891

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 NO*)
DETAILS: FACILITY HAS NOT DISCHARGED DURING THE TERM OF THIS PERMIT.

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

RATON WTP	PERMIT NO. NM0029891

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 NO)*
DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE NO DEVICE INSTALLED	☐ 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.	☐ Y ☐ N ☒ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	☐ Y ☐ N ☒ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	☐ Y ☐ N ☒ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	☐ Y ☐ N ☒ NA
6. HEAD MEASURED AT PROPER LOCATION.	☐ Y ☐ N ☒ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	☐ Y ☐ N ☒ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED NO)*
DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	☐ Y ☐ N ☒ NA

RATON WTP	PERMIT NO. NM0029891

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

LAB ADDRESS

PARAMETERS PERFORMED

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	N/A	N/A	N/A	N/A	N/A	N/A	

RECEIVING WATER OBSERVATIONS

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED YES).*
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

Introduction

On August 6, 2012, Sarah Holcomb of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Raton Water Treatment Plant (WTP). The Raton WTP has a design flow capacity of 0.08 MGD (million gallons per day) and is classified as a minor industrial 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 NM0029891. This permit regulates the WTP discharge to an ephemeral arroyo, thence to Raton Creek, thence to Chicorica Creek, thence to the Canadian River in segment 20.6.4.305 of the Canadian River Basin according to the *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 NMAC.* This segment includes the designated uses of irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat and primary contact.

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

Upon arrival at the WTP at 1455 hours on August 6, 2012, the inspector conducted an entrance interview with Mr. Lonnie Bacon, Operator 4 and Mr. Anthony Bustos, Operator 3, where she presented credentials and explained the purpose of the inspection. Mr. Bacon and Mr. Bustos conducted a tour of the facility, including the onsite lab and files and paperwork kept in relation to the NPDES permit. An exit interview was conducted with Mr. Dan Campbell, Mr. Logan Wood and Mr. Anthony Bustos at approximately 1535 hours on August 6, 2012 where the inspector presented the preliminary findings of the inspection.

Treatment Scheme

The Raton Water Treatment Plant is a municipal drinking water treatment facility. The intake water is received from Lake Maloya and/or the Cimarron River. The facility serves about 6885 people in Raton (according to 2010 Census information).

The plant operates under Standard Industrial Classification Code (SIC) 4941.This facility has the ability to treat up to 4 MGD and runs closely to full capacity, with the backwash and filter-to-waste water flows generating a flow of approximately 0.08 MGD. The raw water is treated with coagulation, flocculation, sedimentation, filtration and disinfection.

Raw water is fed to a holding tank. Raw water is then pumped into the facility where aluminum chloride and polymer are injected. The water is then fed to rectangular clarifiers where the contaminants settle out. After clarification, the water flows into filtration units and then is sent out for distribution. This permit regulates a potential discharge of filter backwash water and filter-to-waste water.

The facility was designed to accommodate the goal to completely reuse the water generated as waste here. Therefore, filter backwash water and filter-to-waste water are discharged to a holding tank for reuse purposes. The water in this tank has the potential to overflow to a holding pond below the plant capable of retaining 1.5 million gallons. This pond has been structured so as to prevent erosion of the banks. Effluent would leave this pond through an outlet at the western end of the pond, which has been constructed with rip rap, but no flow meter. A floating pump is contained in the pond in order to pump water back up to the holding tanks for reuse in the treatment plant system.

Solids Management

Sludge is removed from the settling basins and is put into a concrete lined sludge bed to dry. When the material has dried out, sludge is removed from the bed and is piled next to the concrete. When the pile is big enough, the sludge is then taken to the wastewater treatment plant and is land applied along with the sludge that the wastewater treatment plant generates on their land next to the plant.

Further Explanations

Section C - Operations and Maintenance Evaluation – overall rating of Marginal

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

> *The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*

Findings for Operations and Maintenance:

During a tour of the facility, the inspector observed the basement where the water treatment chemicals are kept. The permittee's representative stated that the policy is to avoid keeping more chemicals on site than they absolutely need, however, there were a number of chemicals on hand. On the west side of the room, a small trough contains water from drip lines where the raw water is tested. These drip lines are constantly flowing. This trough directs the water to a drain, which eventually goes to the wastewater treatment plant. However, being that this was also the room where the process chemicals were kept, including chlorine, aluminum chloride, caustic soda and other chemicals, the inspector was concerned to observe that there were no secondary containment measures in place. In the event of a leak, these chemicals would go straight to the wastewater treatment plant and might cause an upset and noncompliance at that facility, or within the collection system on the way to the wastewater plant. The permittee's representative indicated that this was a problem the water treatment plant was well aware of, and that construction upgrades would be occurring at the plant in the fall to remedy this situation. This is a repeat finding from the 2009 inspection.

The facility representative indicated that an engineering report was being drafted in preparation to find funding to complete this project. The facility needs double walled tanks for the alum, the electrical system needs to be upgraded (the facility was built in the 1950s and still has the original electrical system), and they are assessing whether they should build out the basement to accommodate secondary containment measures for the chemicals stored there.

The pond below the facility (where the filter-to-waste water and filter backwash water are sent) was very full at the time of this inspection. There was perhaps 1-2 feet of freeboard space in the pond. Facility representatives indicated that they are working on a plan to dredge the pond. Their initial goal was to complete this task this summer, however, they anticipate having it done this fall. The facility is still reclaiming as much water as possible from the pond for reuse within the facility, as their practice has historically been. However, if a large rain event were to occur prior to the cleaning of this pond, it might cause a discharge.

NMED/SWQB

Official Photograph Log
Photo # 1

Photographer: Sarah Holcomb	Date: 8-6-2012	Time: 1527 hours
City/County: Raton/Colfax County		
Location: Raton Water Treatment Plant		
Subject: Trough and drain in basement of the water treatment plant that conducts raw water to the wastewater plant. Located in chemical storage area without secondary containment.		

NMED/SWQB

Official Photograph Log
Photo # 2

Photographer: Sarah Holcomb	Date: 8-6-2012	Time: 1527 hours
City/County: Raton/Colfax County		
Location: Raton Water Treatment Plant		
Subject: View of the chemical storage. The tanks on the right are alum storage. Tanks are single walled. There is no secondary containment, and there is another sewer drain located under the middle alum tank. Trough and drain shown in Photo #1 is located to the left in this photo.		

NMED/SWQB

Official Photograph Log
Photo # 3

Photographer: Sarah Holcomb	Date: 8-6-2012	Time: 1519 hours
City/County: Raton/Colfax County		
Location: Raton Water Treatment Plant		
Subject: Pond below the water treatment plant that holds the filter-to-waste water and filter backwash water. In the event of a discharge, water would overflow the dam that the inspector was standing on to take this photo.		

NMED/SWQB

Official Photograph Log
Photo # 4

Photographer: Sarah Holcomb	Date: 8-6-2012	Time: 1518 hours
City/County: Raton/Colfax County		
Location: Raton Water Treatment Plant		
Subject: View of the pump system contained within the pond to facilitate reuse of the water.