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NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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RYAN FLYNN
Cabinet Secretary-Designate

BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

June 24, 2013

Mr. Pete Kampfer, City Manager
P.O. Box 910
224 Savage Ave.
Raton, New Mexico 87740

**Re: Minor Non-Municipal; SIC 4941; Raton Water Treatment Plant; NPDES
Compliance Evaluation Inspection; NM0029891; June 5, 2013**

Dear Mr. Kampfer:

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

City of Raton Water Treatment Plant
NPDES CEI Permit NM0029891
June 5, 2013

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 II, Robert Italiano by e-mail



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	3	0	6	0	5	17	18	C	19	S	20	2
Remarks																												
W A T E R T R E A T M E N T P L A N T																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		-----Reserved-----												
67						70						71		72		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 – from I-25, take exit 454 and make a left turn at the stop. Follow road for about 2 miles. Turn left onto N. 1st Street, follow N. 1st Street to plant. Colfax County	Entry Time /Date 1250/June 5, 2013	Permit Effective Date November 1, 2010
	Exit Time/Date 1522/June 5, 2013	Permit Expiration Date October 31, 2015

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Dan Campbell/General Manager/575-445-3861warehouse 575-445-8092 filter plant 575-445-9591 Lonny Bacon/Filter Plant Superintendent/505-445-9591, cell 505-445-3861, fax 505-445-1089 Anthony Bustos/Operator/ 575-445-959 Logan Wood/Operator/505-501-2813	Other Facility Data GPS: N. 36.918267 W. -104.433844 SIC 4941
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Pete Kampfer/City Manager/ P.O. Box 910, 224 Savage Ave., Raton, New Mexico 87740/ 575-445-9551, fax 575-445-3398	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Section C: Areas Evaluated During Inspection

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

S	Permit	N	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	N	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	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)

- SEE REPORT AND FURTHER EXPLANATIONS.
- THIS FACILITY HAS NOT DISCHARGED DURING THE TERM OF THIS PERMIT.

Name(s) and Signature(s) of Inspector(s) DANIEL VALENTA /s/Daniel Valenta	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2575	Date 6/24/2013
Signature of Management QA Reviewer BRUCE YURDIN /s/Bruce Yurdin	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-2795	Date 6/24/2013

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED *No.*)

- 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.*)

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. **No discharges** 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. DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED (*No*))

- 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

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 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 _____) 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:

No samples taken.

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. ___ % 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	No Discharge						

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: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES

No Samples Taken (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

Raton Water Treatment Plant
NPDES Permit NM0029891
June 5, 2013

Introduction

On June 5, 2013 Daniel Valenta 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 1250 hours on June 5, 2013, the inspector conducted an entrance interview with Mr. Lonnie Bacon, Filter Plant Superintendent and Mr. Anthony Bustos, Plant Operator, where he presented credentials and explained the purpose of the inspection. Mr. Dan Campbell, General Manager, arrived shortly afterwards. Mr. Bacon and Mr. Campbell conducted a tour of the facility, including the onsite lab and files kept in relation to the NPDES permit. An exit interview was conducted with Messrs. Campbell, Bacon, and Wood at approximately 1522 hours on June 5, 2013 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 6882 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, 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 large holding tank. The water is then pumped into the facility where aluminum chloride and a polymer are injected. It flows through two large basins where the floc is allowed to grow in size. The water is then fed into rectangular clarifiers where the floc settles out. After clarification, the water flows into filtration units and then is sent out for distribution. The facility has set a goal of reusing as much of the water generated as waste. Therefore, filter backwash water and filter-to-waste water are discharged to a holding tank for reuse. The accumulated solids are pumped to the pond for settling out. Water in this tank when needed is pumped out into the holding pond below the plant. Water from this pond can be pumped back up to the holding tanks after the waste has settled.

**Raton Water Treatment Plant
NPDES Permit NM0029891
June 5, 2013**

Over the years this process has transported solids into the pond and diminished its holding capacity. If the pond were to overflow it would breach on the west side. The slopes of the pond have been enforced with rip rap to prevent down cutting of the banks and a total collapse of the retention bank.

Further Explanations

Section B – Recordkeeping and Reporting Evaluation - overall rating of Satisfactory

Permit Requirements: Per Page 6 of Part 1E

POLLUTION PREVENTION REQUIREMENTS

The permittee shall institute a program within 12 months of the effective date of the permit (or continue an existing one) directed towards optimizing the efficiency and extending the useful life of the facility. The permittee shall consider the following items in the program:

- a. The influent loadings, flow and design capacity;*
- b. The effluent quality and plant performance;*
- c. The age and expected life of the wastewater treatment facility's equipment;*
- d. Bypasses and overflows of the tributary sewerage system and treatment works;*
- e. New developments at the facility;*
- f. Operator certification and training plans and status;*
- g. The financial status of the facility;*
- h. Preventative maintenance programs and equipment conditions and;*
- i. An overall evaluation of conditions at the facility.*

Findings: The permit became effective on November 1, 2010. Part 1E of the permit required the facility to have a program in place or continue an existing one before November 1, 2011. On the day of the inspection, June 5, 2013, this requirement had not been met. On June 11, 2013 the Raton WTP personnel submitted the attached Pollution Prevention Requirements plan to meet the above requirement.

POLLUTION PREVENTION PROGRAM

Raton Water Treatment Facility – NPDES Permit NM0029891

The utility shall continually strive to upgrade the facility and comply with all New Mexico Environment Department Drinking Water Bureau standards for water treatment and continue the current goal of complete reuse with zero discharge. The program goals and objectives are:

1. Water treatment optimization to meet or exceed all drinking water regulations while increasing efficiency of the process and generating less byproducts, sludge and wastewater
2. Continue zero discharge by reusing all backwash and basin cleanout water
3. Efficiently use all raw water delivered to the facility with minimal loss

The 1946 facility has been upgraded multiple times with a complete expansion in 1995 to extend the facility life. The operations staff certification levels exceed all New Mexico requirements and training exists to continue this level of certification and experience into the future. The facility shall continue and expand the existing preventative maintenance program and continue to maintain a stock of spare components to provide seven day/twenty four hour service to the Raton public. The current Raton Water Works franchise has ten percent of annual revenue committed to a Water/Wastewater Capital Improvement/Emergency Fund. The fund consistently maintains a balance in excess of one million dollars and shall continue to strive to stay properly funded for financial stability. The Raton Water Board shall review all facility capital improvement plans on an annual basis to stay in compliance with all state and federal regulations while providing a quality service and product to the Raton public. Facility upgrade requirements will be continually monitored to maintain quality operation of all processes. New Mexico Environment Department Drinking Water Bureau conducts a Sanitary Survey on a three year interval which consists of a complete evaluation of all facilities, processes, plans, and budgets which will continue to provide a valuable evaluation of the facility in the future and the utility has always strived for compliance of all requirements.