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Surface Water Quality Bureau

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DAVE MARTIN
Secretary
RAJ SOLOMON, P.E.
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 18, 2011

Mr. Timothy P. Dodge
City Manager, City of Las Vegas
1700 North Grand Avenue
Las Vegas, NM 87701

Re: **Minor-Municipal; SIC 4941; Compliance Evaluation Inspection; City of Las Vegas Water Treatment Plant; NM0030341; April 12, 2011**

Dear Mr. Dodge,

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 found were in the recordkeeping and laboratory. 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
Suite 1200, 1445 Ross Avenue
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau
P.O. Box 5469
Santa Fe, New Mexico 87502

I appreciate the cooperation of Mr. Jose Vialpando while at the Las Vegas Water Treatment Plant. If you have any questions about this inspection report, please contact me at (505) 827-2575.

Sincerely,

/s/Daniel Valenta

Daniel Valenta
Environmental Scientist/Specialist
Surface Water Quality Bureau

cc: -Marcia Gail Adams, USEPA (6EN-AS) by e-mail
-Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
-Larry Giglio, USEPA (6EN-P) by e-mail
-Samuel Tates, USEPA (6FS) by e-mail
-Diana McDonald, USEPA (6EN-WM) by e-mail
-Kenny Garcia, Utility Director, City of Las Vegas by e-mail kgarcia@ci.las-vegas.nm.us
-Robert Italiano, NMED District II Manager (Santa Fe) 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 3 0 3 4 1 11 12 1 1 0 4 1 2 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 69	70 2	71 N	72 N	73	74 75 M I N O R 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) City of Las Vegas Water Treatment Plant, 3390 Hot Springs Road (NM 65), Montezuma, San Miguel County, New Mexico. From I-25, take exit 343, turn left onto Grand Avenue (NM 85), turn left onto 329, turn left onto Hot Springs Road, and continue approximately 5 miles to facility entrance on southwest side of road.	Entry Time /Date 1010 hours / 04-12-2011	Permit Effective Date December 1, 2006
	Exit Time/Date 1340 hours / 04-12-2011	Permit Expiration Date November 30, 2011
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jose Vialpando/Water Operations Supervisor/505-454-1533 fax 505-454-9879 Bernadette Gold/ Water Quality Technician/505-454-1533 fax 505-454-9879	Other Facility Data SIC 4941 Outfall 001	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Timothy P. Dodge, 1700 North Grand Avenue, Las Vegas, NM 87701/ City Manager, City of Las Vegas/ 505-454-1401 ex: 3256 fax 505-425-7335	Yes <input type="checkbox"/> Contacted No <input checked="" type="checkbox"/> *	Latitude 35° 39' 02.13" N Longitude -105° 16' 31.22" W

Section C: Areas Evaluated During Inspection

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

S	Permit	S	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
N	Effluent/Receiving Waters	U	Laboratory	N	Storm Water	N	Other:

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

1. SEE ATTACHED CHECKLIST AND REPORT FOR FURTHER EXPLANATIONS.

Name(s) and Signature(s) of Inspector(s) Daniel J. Valenta /s/Daniel Valenta	Agency/Office/Telephone/Fax NMED/SWQB/505-827-2575	Date 4/18/2011
Signature of Management QA Reviewer Richard Powell /s/Richard Powell	Agency/Office/Phone and Fax Numbers NMED/SWQB/505-827-2798	Date 4/18/2011

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. DETAILS: **No DMR's submitted since Nov. 2008** S M U NA (FURTHER EXPLANATION ATTACHED **yes**)

- 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. 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: **Permittee reports no discharge to Outfall 001.**

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. Y N NA
 TYPE OF DEVICE **4" Neptune Tru Flow Meter**
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. **No discharge has occurred** 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. ___ % 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: No Flow.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED no).

DETAILS: **Permittee discharges waste water and solids via force main to City of Las Vegas Waste Water Treatment Plant.**

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: NA (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

**City of Las Vegas Water Treatment Plant
NPDES Permit No NM0030341
Compliance Evaluation Inspection**

Further Explanations

Introduction

On April 12, 2011, Daniel Valenta, accompanied by Sandra Gabaldon, both of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the City of Las Vegas Water Treatment Plant (WTP) at 3390 Hot Springs Boulevard, New Mexico State Highway (NM) 65, in Montezuma, San Miguel County, New Mexico. The Las Vegas WTP has a design flow capacity of 5 MGD (million gallons per day) and is classified as a minor municipal 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 NM0030341. This permit regulates the WTP's "emergency" discharge to an unnamed arroyo and thence to the Gallinas River below the diversion for the Las Vegas municipal reservoir in Segment 20.6.4.220 of the Pecos River Basin according to the *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code* (NMAC). This segment includes the designated uses of irrigation, livestock watering, wildlife habitat, marginal coldwater aquatic life and primary contact.

The NMED performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate compliance with the NPDES permit. This inspection report is based on information provided by the facility representatives, observations made by the NMED inspectors, records, and reports kept by the facility and/or NMED. Upon arrival at the City of Las Vegas WTP at 1010 hours, the inspector presented his credentials to Mr. Jose Vialpando, Water Operations Supervisor for the WTP and explained the purpose of the inspection. Mr. Vialpando contacted Mr. Kenny Garcia, Utility Director and arranged for the inspectors to meet briefly with him at his office at 1130 to review the permit renewal process and preliminary finding. The inspectors returned to the WTP at 1300 to review records. Following the review, an exit interview to discuss preliminary findings was conducted with Mr. Vialpando and Ms. Bernadette Gold, Water Quality Technician. The inspection ended at 1340 hours on April 12, 2011.

Treatment Scheme

The City of Las Vegas WTP treats surface water diverted from the Gallinas River. The drinking water treatment process includes disinfection, coagulation, flocculation, sedimentation, and filtration. Water from the diversion dam on the Gallinas River is gravity fed to a settling pond. From the settling pond, raw water flows through gravity fed water lines and can be stored in Peterson Reservoir, Bradner Reservoir and/or Storrie Lake before treatment at the plant.

From the reservoirs, raw water enters a pump house where mixed oxidants or MIOX-generated chlorine, aluminum sulfate and cationic polymer are injected. Following mixing, water enters into one of two clarifier units. The clarifier units have a design capacity of 10 MGD and may be operated in parallel, but currently the plant alternates between the clarifiers for maintenance and to remove settled solids. Every 4 months, settled solids are removed from the bottom of the shut down clarifier unit using a track-vac system and pumped to a 0.5 million gallon concrete-lined storage lagoon.

City of Las Vegas Water Treatment Plant
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After the clarifiers, water flows into the multi-media filtration basins. From the filtration basins, flows may be directed two ways. The water for potable use flows into the clear well for additional MIOX disinfection before routing to the distribution system. Or the backwash from the filtration filter is sent to the backwash recovery basin to allow solids to settle. The top volume of water is sent back to the inlet feed for recycling with the settled waste pumped to the concrete-lined waste storage lagoon.

The concrete-lined storage lagoon is aerated to further degrade solids and keep the system from going septic and remain in suspension. Floor drains in the various buildings discharge to the waste lagoon. The lagoon is discharged in the late evening hours to the Las Vegas Waste Water Treatment Plant (WWTP) nightly. If the lagoon were to overflow it would discharge to a storage depression next to the waste lagoon. Water and solids from the backwash recovery basin can be diverted to the permitted Outfall 001 instead of the waste lagoon. At Outfall 001 is a 4" Neptune Tru Flow Meter that has not recorded flow since the last inspection on April 1, 2009, a visual inspection at the outfall detected no sign of discharge.

The WTP operates 24/7. On weekends an operator does a walkthrough of the plant and is on call. Major treatment operations for the WTP have an alarm system and automatic call system with backups for high and low levels, power loss and equipment failures. The pumps allowing discharge to the WWTP are not alarmed, but a high level alarm exists at the lagoon. The WTP has standby generator on site and is tested weekly.

The current permit, NM0030341, expires on November 30, 2011. Rather than filing a new application, since there appears to be no history or need to discharge via Outfall 001, the operator may want to discuss termination of the permit with EPA.

**City of Las Vegas Water Treatment Plant
NPDES Permit No NM0030341
Compliance Evaluation Inspection**

Finding

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

Part I.B (Monitoring and Reporting) of the permit states: *“Monitoring information shall be on Discharge Monitoring Report Form(s) EPA 3320-1 as specified in Part III.D.4 of this permit and shall be submitted quarterly.*

1. *The permittee shall monitor and record the discharge on DMR monthly.*
2. *Reporting periods shall end on the last day of March, June, September, and December.*
3. *The permittee is required to submit regular discharge reports as described above postmarked no later than the 28th day of the month following each reporting period.”*

Part III.D.4 (Standard Conditions, Discharge Monitoring Reports and Other Reports) of the permit states:

1. *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 III.D.11 and all other reports required by Part III.D to the EPA at the address below. Duplicate copies of DMRs and all other reports shall be submitted to the appropriate State agency(ies)...*

No required monthly Discharge Monitoring Reports have been submitted to NMED since November 2008. Missing DMR’s is a repeat finding also in the 2006 inspection.

B. Section F – Laboratory – Overall Rating of “Unsatisfactory”

“Part 1 Section A (Limitations and Monitoring Requirements) During the period beginning the effective date of the permit and lasting through the expiration date of the permit (unless otherwise noted), the permittee is authorized to discharge backwash and filter-to-waste water, under emergency conditions, to Gallinas River in Segment Number 20.6.4.220, from Outfall 001 (See Part II.B.). If discharges occur, such discharges shall be limited and monitored by the permittee as specified below:”

**City of Las Vegas Water Treatment Plant
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Compliance Evaluation Inspection**

EFFLUENT CHARACTERISTICS		DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
		Standard Units			
POLLUTANT	STORET CODE	MINIMUM	MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
PH	00400	6.6	9.0	1/Week	Grab

EFFLUENT CHARACTERISTICS		DISCHARGE LIMITATIONS			MONITORING REQUIREMENTS	
		Mass, lb/day	Concentration, mg/l			
POLLUTANT	STORET CODE	30-DAY AVG	30-DAY AVG	DAILY MAX	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	50050	Report MGD	***	***	1/Week	Estimated
Total Suspended Solids	00530	Report	Report	Report	1/Week	Grab
Total Residual Chlorine	50060	N/A	N/A	19 ug/l	Daily	Instantaneous Grab (*1)
Total Aluminum	01105	Report	Report	Report	1/Week	Grab
Dissolved Aluminum	01106	Report	Report	Report	1/Week	Grab

EFFLUENT CHARACTERISTICS		DISCHARGE MONITORING		MONITORING REQUIREMENTS	
WHOLE EFFLUENT TOXICITY TESTING (48-Hr. Static Non-Renewal) ⁽²⁾			48-HR MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
		30-DAY AVG			
Daphnia pulex		Report	Report	Once/Term ⁽³⁾	Grab
Pimephales promelas		Report	Report	Once/Term ⁽³⁾	Grab

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

“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. 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.”

This is a repeat finding of the April 2009 Inspection. The facility had not established laboratory procedures or adequate arrangements with contract or other laboratories to conduct analytical testing in the event of a discharge to Outfall 001. The facility representative stated that he needed to make arrangements to have WWTP staff collect samples and conduct or arrange for analytical testing for all pollutants required to be monitored by the permit.