



**NEW MEXICO
ENVIRONMENT DEPARTMENT**



Resource Protection Division

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**DAVE MARTIN
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Deputy Secretary**

**THOMAS SKIBITSKI
Acting Division Director**

Certified Mail – Return Receipt Requested

May 15, 2013

The Honorable Danny J. Cruz, Mayor
Town of Springer
Post Office Box 448
Springer, NM 87747

RE: Minor Municipal, SIC 4941, NPDES Compliance Evaluation Inspection, Town of Springer Water Treatment Plant, NM0030627, April 18, 2013

Dear Mr. Cruz:

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) 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.

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 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
Allied Bank Tower
Region VI Enforcement Branch (6EN-
WM)
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

Town of Springer WTP
Mr. Danny J. Cruz
Page -2-
May 15,2013

I wish to thank your staff for their cooperation during this inspection. If you have any questions concerning this inspection report, please feel free to contact me at the above address or by telephone (505) 827-1041.

Sincerely,

/s/ Sandra Gabaldon
Sandra Gabaldón
Surface Water Quality Bureau

Cc: Rashida Bowlin, 6EN-WC, via email
Darlene Whitten-Hill, 6EN-WC, via email
Carol Peters-Wagnon, 6EN-WM, via email
Jan Walker, 6EN-WC, via e-mail
Larry Giglio, 6WQ-PP, via email
Diana McDonald, 6EN-WM, via email
District II, via e-mail



NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="N"/> <input type="text" value="M"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="3"/> <input type="text" value="0"/> <input type="text" value="6"/> <input type="text" value="2"/> <input type="text" value="7"/> 11 12 <input type="text" value="1"/> <input type="text" value="3"/> <input type="text" value="0"/> <input type="text" value="4"/> <input type="text" value="1"/> <input type="text" value="8"/> 17 18 <input type="text" value="C"/> 19 <input type="text" value="S"/> 20 <input type="text" value="1"/>	Remarks				
<input type="text" value="T"/> <input type="text" value="O"/> <input type="text" value="W"/> <input type="text" value="N"/> <input type="text" value="O"/> <input type="text" value="F"/> <input type="text" value="S"/> <input type="text" value="P"/> <input type="text" value="R"/> <input type="text" value="I"/> <input type="text" value="N"/> <input type="text" value="G"/> <input type="text" value="E"/> <input type="text" value="R"/> <input type="text" value="W"/> <input type="text" value="T"/> <input type="text" value="P"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text"/> <input type="text"/> <input type="text"/> 69	70 <input type="text" value="3"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text"/> <input type="text"/> <input type="text"/>	74 75 <input type="text"/>

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) NM 128 HWY 468, Springer, NM. From I-25, take exit 412, continue 0.9 miles on Maxwell Ave., then 0.3 miles on Railroad Ave., turn west on NM 468, travel 1.9 miles, turn north on access road, facility on right. COLFAX COUNTY	Entry Time /Date 0950 hours / April 18, 2013	Permit Effective Date August 28, 2007
	Exit Time/Date 1220 hours / April 18, 2013	Permit Expiration Date September 30, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Warren Hurtgen, Certified Operator I, (575) 483-2682	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Danny J. Cruz, Mayor / 575-483-2910 Post Office Box 488 606 Colbert Avenue Springer, New Mexico 87747	Contacted Yes <input type="checkbox"/> No <input type="checkbox"/> *	SIC Code: 4941 Outfall 001: Latitude N. 36.392030° Longitude W. -104.615260°

Section C: Areas Evaluated During Inspection

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

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

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

See further explanations for details.

Name(s) and Signature(s) of Inspector(s) Sandra Gabaldón /s/ Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB/(505) 827-1041/ (505) 827-0160	Date 05/15/2013
Signature of Management QA Reviewer Bruce Yurdin, Program Manager /s/ Bruce Yurdin	Agency/Office/Phone and Fax Numbers NMED/SWQB/(505) 827-2795/(505) 827-0160	Date 05/14/2013

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS S M U NA (FURTHER EXPLANATION ATTACHED YES)

DETAILS: **Permit issued: August 28, 2007; Expires: September 30, 2013 - RENEWAL APPLICATION RECEIVED 04/09/2012**

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE **Application states: Town of Springer; Permit states: City of Springer** 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 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

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 X U NA (FURTHER EXPLANATION ATTACHED YES).
 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. Y N NA
 TYPE OF DEVICE Estimate flow.

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. Y N X NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. Y N X NA

4. CALIBRATION FREQUENCY ADEQUATE. Last Calibration 02/06/2013 by Yukon and Associates. Y N X NA
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES. Y N X NA
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. No records maintained of calibration checks Y N X NA

5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. Y N X NA

6. HEAD MEASURED AT PROPER LOCATION. Y N X NA

7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES. Y N X NA

SECTION F - LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. S X 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 O M X U NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. S X M U NA

5. DUPLICATE SAMPLES ARE ANALYZED. 0 % OF THE TIME. TRC, pH Y X N NA

6. SPIKED SAMPLES ARE ANALYZED. 0 % OF THE TIME. TRC Y X N NA

7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME Hall Environmental Analysis Laboratory Bio-Aquatics

LAB ADDRESS 4901 Hawkins, NE 2501 Mayes Road, Carrollton, TX 75006

PARAMETERS PERFORMED Aluminum, Nickel, Zinc Whole Effluent Toxicity

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. S M O U NA (FURTHER EXPLANATION ATTACHED YES).

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	No Discharge						

RECEIVING WATER OBSERVATIONS Unnamed tributary, thence Cimarron River, not inspected.

SECTION H - SLUDGE DISPOSAL

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

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. S M U X NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. S M U X 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 X 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

Town of Springer
NPDES Permit No. NM0030627
Compliance Evaluation Inspection
April 18, 2013

Introduction:

On April 18, 2013, Sandra Gabaldón and Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a compliance evaluation inspection (CEI) at the Town of Springer Water Treatment Plant (WTP). The Springer WTP has a design flow capacity of 0.280 million gallons per day (MGD) and is classified as a minor 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 NM0030627. This permit regulates the WTP backwash water to an unnamed arroyo, thence to the Cimarron River in waterbody segment 20.6.4.306 of the Canadian River Basin. Designated uses of this segment include: irrigation, warmwater aquatic life, livestock watering, wildlife habitat and primary contact; and public water supply on the Cimarroncito creek.

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 representative, observations made by NMED staff, and records and reports kept by the permittee and/or NMED.

Upon arrival at the WTP at 0950 hours on April 18, 2013, the inspector conducted an entrance interview with Mr. Warren Hurtgen, Certified Operator I where credentials were presented and the purpose of the inspection explained. Mr. Hurtgen has been employed for approximately one year with the Town of Springer. Ms. Laura Danielson, Lead Operator, was on vacation on this day. Limited records were reviewed, as the operator did not know the location of records maintained for their NPDES permit. An exit conference was again held with Mr. Hurtgen at the Town of Springer Wastewater Treatment Plant at approximately 1330 hours to present preliminary findings of the inspections (both the water treatment plant and the wastewater treatment plant were inspected on this day; only the WTP is discussed here).

Treatment Scheme:

The Town of Springer WTP treats surface water from two reservoirs. The facility serves a population of approximately 1,047 (2010 Census) and the Springer Correctional Facility (inmate population of 296). Overflows from the upper reservoir drain via a spillway into the lower reservoir from which raw water is drawn for treatment. The lower reservoir also has a spillway and associated drainage ditch leading toward the unnamed tributary south of the facility. The dams are currently subject to a New Mexico Office of the State Engineer order limiting storage in the reservoirs. Re-construction of the reservoirs and lower spillway are in the early stages of funding from the state of New Mexico.

Copper sulfate to control algae for taste and odor control is used in the reservoirs in the warmer months. Approximately 75 pounds of copper sulfate per month is broadcast into each reservoir.

Raw water from the lower reservoir flows via gravity to a pump station and sent to the enclosed treatment plant. Raw water is treated by two Tonka package plants rated at 525,600 gallons per day each. Treatment processes are conventional and include coagulation, flocculation, sedimentation, filtration, and disinfection. The treatment scheme primarily consists of chemical injection followed by two parallel package units, each compartmentalized into two flocculation chambers, sedimentation basin, and multi-media filter. Depending on water demand or maintenance schedule, one or both of the package units may be placed into service at any time. Following filtration, through the multi-media unit, water is disinfected with a mixed oxidant (MIOX) disinfecting solution before distribution to the municipal drinking water supply system.

At the head of the plant, aluminum sulfate and cationic polymer (Poly-Diallyldimethylammonium Chloride or pDADMAC) are injected into the raw water within the intake pipes and then flashed mixed. Water flows into the flocculation chamber where horizontal paddle wheel mixers enhance the coagulation-flocculation process. Following the flocculation chamber, flow enters the sedimentation basin and is thrust up through tube settlers. The upward movement of water through the tube settlers allows each tube to function as a small settling basin. From the sedimentation basin, water enters a multi-media filtration unit for removal of remaining suspended solids. Filter backwashing begins automatically at preset intervals based on continuously monitored effluent turbidity levels. The operator may also manually backwash the filter media. Finished (potable water) is used to backwash the filters. Backwash water is flushed to a detention pond (also known as the backwash pond) located adjacent to the treatment building.

The dimensions of the backwash pond are approximately 60 feet by 40 feet. The backwash pond is excavated yearly according to the operator. Solids are allowed to dry on the banks of the backwash pond, then placed in a drum for storage on site. An outlet pipe installed near the top of the detention pond decants and conveys wastewater to Outfall 001, located approximately 400 feet down gradient from the pond.

Section A – Permit Verification – Overall Rating of “Marginal”

Permit Requirements for Permit Verification:

Part III.D.9 States:

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.

Findings for Permit Verification

The permittee submitted a permit renewal application on April 9, 2012. However, the permittee did not list copper sulfate as being used in the process. The Permittee should contact USEPA Region 6 Permit Branch to submit additional information that has not been provided in the permit application.

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

Permit Requirements for Recordkeeping and Reporting:

Part III.C.1 states:

The permittee shall allow the Director, or an authorized representative, upon the presentation of credentials and other documents as may be required by the law to:

- a. Enter upon the permittee’s premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;*
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;*
- c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices or operations regulated under this permit.*

Part III.C.4 states:

Records and monitoring information shall include:

- a. The date, exact place, and time of sampling or measurements;*
- b. The individual(s) who performed the sampling or measurements;*
- c. The date(s) and time(s) analyses were performed;*
- d. The individual(s) who performed the analyses;*
- e. The analytical techniques or methods used; and*
- f. The results of such analyses.*

Part III.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.

Part III.D.8 of the permit states:

The permittee shall report all instances of noncompliance not reported under III.D.4 and D.7 and Part I.B (for industrial permits only) at the time monitoring reports are submitted. The reports shall contain the information listed in Part III.D.7.

Findings for Recordkeeping and Reporting:

The permittee's representative, Mr. Hurtgen, was unable to provide all records at the time of this inspection. The permit explicitly states that records are to be made available to an authorized representative (NMED) at the time of the inspection. The operator should be made aware where all records are kept for future inspections or when requested by the Director or other authorized representatives.

The benchsheets provided by the permittee's representative included January, February, March, April 2013 and December 2012 and October 2012. The following information was obtained reviewing these benchsheets.

- Initials are provided; however there is no indication if this individual is the person who sampled or who analyzed the sample. Further clarification is needed.
- There are no analytical technique or method used stated on the benchsheet for Cl or pH
- The benchsheets have columns for "Time Sample" and "Time Test"; however, on many occasions, the "Time Test" is left blank for Cl and pH. Both Cl and pH have a holding time of 15 minutes. There is no way for the inspector to verify holding times when this information is not included on the benchsheets. The permittee should insure all times are recorded.

"Time Test" left blank:

- April 2013 – April 4, 9, and 12th.
- February 2013 – February 2, 8, 9, and 24th.
- October 2012 – October 5, 13, and 24th
- December 2012 – December 3, 8, 14, 15, 18, 20, 21, 29 and 3st.

Review of the benchsheets indicate that calibration of the pH and Cl meters are done on a weekly basis. It is important that calibration be done to insure accuracy of measurements when taken. It is suggested that calibration of both the pH meter and Cl meter be done each time the instrument is being used for compliance sampling.

In March 2013, the Town of Springer notified EPA of their aluminum exceedance for the month. However, they reported as 200 ug/L and the actual results was 290 ug/L.

Aluminum seems to be a recurring problem with this facility. Review of DMR submittals from 12/2012 to the present revealed the following results:

Date:	Reported Daily Max:	Reported Monthly Ave:
12/2012	36 ug/L	36 ug/L
11/2012	0 ug /L	0 ug/L
10/2012	0 ug/L	0 ug/L
09/2012	1200 ug/L	1200 ug/L
08/2012	30 ug/L	30 ug/L
07/2012	0 ug/L	0 ug/L
06/2012	31 ug/L	31 ug/L
05/2012	400 ug/L	400 ug/L
04/2012	180 ug/L	180 ug/L
03/2012	150 ug/L	150 ug/L
02/2012*	700 ug/L	1400 ug/L
01/2012	510 ug/L	510 ug/L
03/2013	290 ug/L	290 ug/L
02/2013	62 ug/L	62 ug/L
01/2013	26 ug/L	26 ug/L

Aluminum is to be sampled once a month and has a 30-day average limitation of 58 ug/L. Aluminum has a daily maximum limitation of 87 ug/L.

*This sample is unusual in that two different results were reported on the DMR. This could be a result of duplicate sampling; however, the benchsheet from the commercial laboratory was unavailable for review.

Section C – Operation and Maintenance – Overall Rating of “Marginal”

Permit Requirements for Operation and Maintenance:

Part III.B.3.b of the permit states:

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:

Although the Town of Springer has three employees who work at the WTP, it is evident that more help is needed. On the day of the inspection, the lead operator was on vacation, the Level III Operator was helping with other public utility duties and there was only the Level I operator available for the inspection. The Level I operator is fairly new to the facility and requires further assistance in operation, maintenance and compliance sampling.

The facility does not have procedures for emergency treatment control established at this time. Any disaster that may occur should be addressed in a written document and shared with all employees.

Section D – Self Monitoring – Overall Rating of “Unsatisfactory”

Section F – Laboratory – Overall Rating of “Unsatisfactory”

Permit Requirements for Self-Monitoring and Laboratory:

Part I.A – Final Limitations and Monitoring Requirements (Please see Permit for details)

Part II.D – Whole Effluent Toxicity Testing (Please see Permit for details)

Part III.C.5 states:

- a. *Monitoring must be conducted according to test procedures approved under 40 CFR 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.*

Findings for Self-Monitoring and Laboratory:

The permittee has no SOPs available for CI sampling or analysis. When the inspector asked the operator to describe the sampling and analysis required for CI, the operator did not appear to use the approved method under 40 CFR 136. The operator read the results immediately, instead of allowing the reagent to react for three minutes. The operator did not wipe off any smudges that may occur from handling and interfere with the reading. The operator used the same cell to prepare the blank and the prepared sample.

On the benchsheets for pH, there is only a column for calibration of buffer 7. The operator stated that one calibration for buffer 7 was used once a week. The procedure requires three point standardization. Calibration of the pH meter should be done each time the pH is taken since this parameter is only checked weekly. According to Standard Methods, 4500-H+B (pH), it states: “When only occasional pH measurements are made, standardize instrument before each measurement.”

The facility has no approved written analytical methods on site to refer to if questions arise.

WET testing was conducted in 2009 (permit requires once per permit term). However, the commercial laboratory used the wrong dilution series. Instead of using 32%, 42%, 56%, 75%, and 100%, the commercial laboratory used 31%, 42%, 56%, 74% and 99%. The commercial laboratory reported the 75% critical dilution results.

The permittee should do duplicate analyses with each batch of samples to determine precision. In general, ten (10) percent of the samples should be duplicated.

The precision of laboratory findings refers to the reproducibility or degree of agreement among replicate measurements of the same quantity. The closer the numerical values of the measurements come to each other, the more precise are the measurements. In a laboratory QC program, precision is determined by the analysis of actual samples in duplicate.

The permittee currently does not do duplicate samples.

Part of quality assurance for a laboratory is to provide an adequate bench area as well as cleanliness where any analysis is performed. Review of the bench area showed it to be dirty and disorganized. The permittee has no written procedures for cleaning glassware, storage of standards or any procedures for cleaning the area prior to and after analyses of samples.

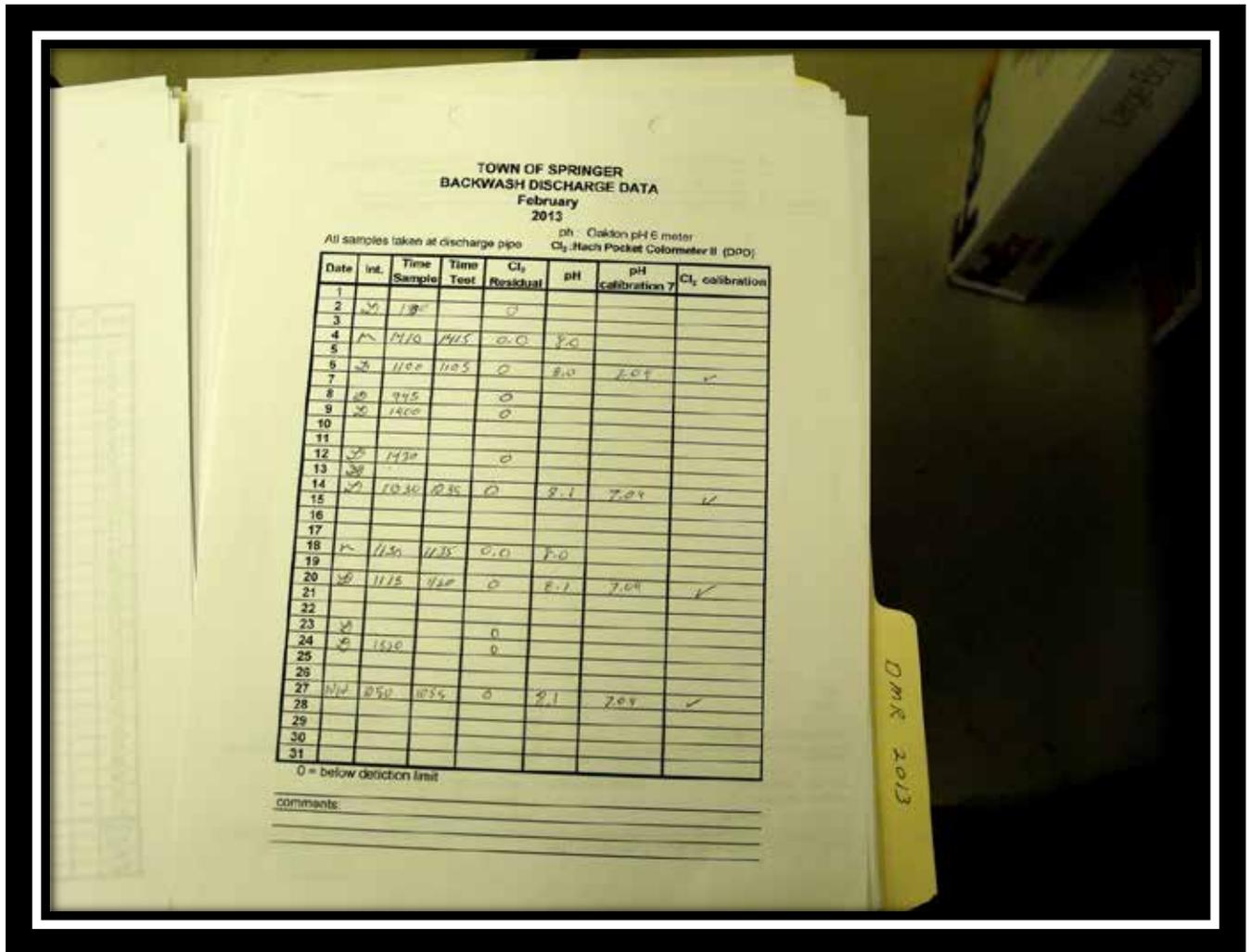
NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Daniel Valenta	Date: 04-18-2013	Time: 1133 Hours
City/County: Town of Springer / Colfax County		State: New Mexico
Location: Town of Springer Water Treatment Plant		
Subject: Overall view of laboratory		



NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Daniel Valenta	Date: 04-18-2013	Time: 1119 Hours
City/County: Town of Springer / Colfax County		State: New Mexico
Location: Town of Springer WTP		
Subject: Benchsheet from February 2013 – Note the pH calibration column and the blank "Time Test" column.		



NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Daniel Valenta	Date: 04-18-2013	Time: 1156 Hours
City/County: Town of Springer / Colfax County		State: New Mexico
Location: Town of Springer WTP		
Subject: Backwash pond / Arrow points to re-disturbance of solids when backwash occurs.		



NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: Daniel Valenta	Date: 04-11-2013	Time: 1223 Hours
City/County: Town of Springer / Colfax County		State: New Mexico
Location: Town of Springer Water Treatment Plant		
Subject: Overflow pipe to discharge. Notice solids above overflow pipe and the appearance of sediment flowing into pipe.		

