NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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Lieutenant Governor

DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

TOM SKIBITSKI
Acting Director
Resource Protection Division

Certified Mail - Return Receipt Requested

January 28, 2013

Alan Briley, P.E., City Manager
City of Elephant Butte
P.O. Box 1080
Elephant Butte, New Mexico 87935

RE: Minor Municipal, SIC 4952, NPDES Compliance Evaluation Inspection, City of Elephant Butte / Sierra County Regional WWTP – North Area, NM0030864, January 10, 2013

Dear Mr. Briley,

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 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
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

I appreciate your and Jesse Cole, Wastewater Utility Operator, City of Elephant Butte cooperation during the inspection. If you have any questions about this inspection report, please contact me at (505) 827-0418.

Sincerely,

/s/ Erin S. Trujillo
Erin S. Trujillo
Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN) by e-mail
Hannah Branning, USEPA (6EN-WC) by e-mail
Darlene Whitten-Hill, USEPA (6EN-WC) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Larry Giglio, USEPA (6WQ-PP) by e-mail
Mike Kesler, NMED District III Las Cruces 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 8 6 4 11 12	1 3 0 1 1 0 17 18	C 19	S 20	1

Remarks

W A S T E W A T E R T R E A T M E 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)*	Entry Time /Date	Permit Effective Date
Sierra County Regional Wastewater Treatment Plant (WWTP) – North Area. From I-25 take Exit 79 east, turn north onto NM 181, cross Cuchillo Negro Creek, take first unsigned road east, travel approximately 0.4 miles to stop sign, continue approximately 0.1 miles to an area with unpaved gravel roads that continue south and east to WWTP. Sierra County	**1045 hours / 01/10/2013**	August 1, 2007
	Exit Time/Date **1455 hours / 01/10/2013**	Permit Expiration Date July 31, 2012

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Jesse Cole, Wastewater Utility Operator III, City of Elephant Butte, 575-740-8791, cell 740-8791
Allen Briley, City Manager, City of Elephant Butte

Name, Address of Responsible Official/Title/Phone and Fax Number
Alan Briley, P.E., City Manager, City of Elephant Butte, P.O. Box 1080, Elephant Butte, New Mexico 87935 / 575-744-4892 and fax 575-744-4493

Contacted: Yes [*] No [ ]

Other Facility Data
Outfall 001
Latitude 33.154450°
Longitude -107.231161°

SIC 4952

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

M	Permit	M	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	U	Self-Monitoring Program	M	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
M	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 REPORT WITH FURTHER EXPLANATIONS AND PHOTO LOG.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Erin S. Trujillo ***/s/ Erin S. Trujillo***	**NMED/SWQB/505-827-0418**	**01/28/2013**
Signature of Management QA Reviewer	**Agency/Office/Telephone/Fax**	**Date**
Richard E. Powell ***/s/ Richard E. Powell***	**NMED/SWQB/505-827-2798**	**01/28/2013**

City of Elephant Butte - Sierra County Regional WWTP – 01/10/2013	PERMIT NO. **NM0030864**

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☐ S ☒ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED* ***Yes***)
DETAILS: **180 days before permit termination was 02/02/2012. USEPA letter dated 05/17/2012 stated application rec'd 02/28/2012.**

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE **permittee name (City of Elephant Butte) not on permit**	☐ 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 **outfall location needs to be updated**	☐ Y ☒ N ☐ NA
4. ALL DISCHARGES ARE PERMITTED **continuation of expired permit**	☒ 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: **See Table 1 for DMR summary. Reviewed analytical reports for samples collected 04/2012. Calculation checks in Table 2.**

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. **BOD5, TSS, E.coli and Flow Calculations**	☐ 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. **But, pH method needs to be updated on form**	☒ 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. **pH**	☒ 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: **Replacement of the fine bubble diffusers was planned for one of the reactors. No written Pollution Prevention program.**

1. TREATMENT UNITS PROPERLY OPERATED.	☒ S ☐ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED. **Some brown foam and solids observed in EQ basin**	☐ S ☒ M ☐ U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED . **100 gallon diesel generator on site**	☒ S ☐ M ☐ U ☐ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. **remote alarm dialing monitor (e.g., power, high levels, lift stations)**	☒ 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. **Repeat Finding**	☐ Y ☒ N ☐ NA

City of Elephant Butte - Sierra County Regional WWTP – 01/10/2013	PERMIT NO. **NM0030864**

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* ***Yes*** *)*.
DETAILS: **Part I.A of permit requires 3-hr composite monitoring sample type for BOD5 and TSS**

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. **BOD5 and TSS**	☐ Y ☒ N ☐ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. **TRC (prior to April 12)**	☐ Y ☒ N ☐ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. **TRC (prior to April 2012)**	☐ Y ☒ N ☐ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE **Not documented**	☐ Y ☒ N ☐ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	☒ Y ☐ N ☐ NA
b) PROPER PRESERVATION TECHNIQUES USED. **Not documented (preservation for E.coli monitoring)**	☐ Y ☒ N ☐ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3. **Not documented (container type)**	☐ 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**: Flow is batch discharge. Some algal growth and some turbulence observed in flume.**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE **3" insert nested in 9" Parshall flume**	☒ Y ☐ N ☐ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	☒ Y ☐ N ☐ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. **ultrasonic flow meter**	☒ Y ☐ N ☐ NA
4. CALIBRATION FREQUENCY ADEQUATE. **Last calibration 10/01/2012 Ted D. Miller Associates**	☒ 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: **pH conducted on-site. When required, TRC would also be conducted on site. Contract laboratories were not inspected.**

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)* **BOD5**	☐ Y ☒ N ☐ NA

City of Elephant Butte - Sierra County Regional WWTP – 01/10/2013	PERMIT NO. NM0030864

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. **Trip blanks were used for application renewal testing** ☐ S ☒ M ☐ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. **0** % OF THE TIME. ☐ Y ☒ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. **pH (not applicable); Contract Laboratory (not documented)** % OF THE TIME. ☐ Y ☒ N ☐ NA

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

LAB NAME	**1) Aqua Environmental Testing Lab, 575-526-0871**	**2) Wilkins Environmental**
LAB ADDRESS	**12695 Leasburg St Park Rd, Las Cruces, NM 8807**	**832 NW 67th Street, Oklahoma City, OK 73116**
PARAMETERS PERFORMED	**BOD, TSS, E.coli Bacteria**	**WET**

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**	**White Foam**	**None**	**Clear**	**None**

RECEIVING WATER OBSERVATIONS: **Some white foam observed in effluent. Last reported exceedance was TSS in Feb 2011. No TRC monitoring was reported during described use of chlorine prior to April 2012.**

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. **Certification** ☐ S ☐ M ☒ U ☐ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: **Not Applicable** (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 Elephant Butte – Sierra County Regional WWTP North Area
NPDES Permit No NM0030864
Compliance Evaluation Inspection
January 10, 2013

Further Explanations

Introduction

On January 10, 2013, Erin Trujillo of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Sierra County Regional Waste Water Treatment Plant (WWTP) – North Area within the city limits of Truth or Consequences, Sierra County, New Mexico. The address of the WWTP is 1001 Sunset Ridge Road; however, roads to the plant are not signed at this time. The WWTP, on land owned and operated by the City of Elephant Butte, has a design flow of 0.6 million gallons a day (MGD), and is classified as a minor municipal discharger under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned permit number NM0030864 which regulates discharge of treated effluent from outfall 001, thence to a tributary, thence to Cuchillo Negro Creek, thence approximately 0.7 miles to Rio Grande in Segment 20.6.4.103 *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC*).

Segment 20.6.4.103 of the Rio Grande Basin is described as the main stem of the Rio Grande from the headwaters of Caballo Reservoir upstream to Elephant Butte dam and perennial reaches of tributaries to the Rio Grande in Sierra and Socorro counties, excluding waters on tribal lands. This segment includes the designated uses of irrigation, livestock watering, wildlife habitat, marginal coldwater aquatic life, secondary contact and warmwater aquatic life. Rio Grande from Caballo Reservoir to Elephant Butte Reservoir does not support Marginal Coldwater Aquatic Life. The dissolved oxygen impairment may indicate excessive nutrients. Probable sources of impairment are listed as unknown. Protocols for nutrients in large rivers are under development.

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 the Permittee's compliance with the NPDES permit. 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 WWTP at approximately 1045 hours on the day of this inspection, the inspector made introductions, presented credentials and explained the purpose of the inspection to Mr. Jesse Cole, Wastewater Utility Operator III, City of Elephant Butte. The inspector and Mr. Cole toured the plant until approximately 1400 hours. The inspector conducted an exit interview to discuss preliminary findings with Mr. Cole and Mr. Alan Briley at the City's 103 Water Street, Elephant Butte, New Mexico offices. The inspector left the City's Water Street offices at approximately 1455 hours on the day of this inspection.

Treatment Scheme

City of Elephant Butte web site states, *"…about 30% of the town has been served with sewer with additional sewer being installed as funds become available."* The estimated population is approximately 1,000. According to the on-site permittee representative, the plant does not receive domestic waste from sludge haulers.

Raw sewage flows through a collection system via six (6) lift stations to the plant. The final station is approximately one quarter mile north of the plant. Influent flow is measured with a magnetic flow meter. An additional lift station is located at the treatment plant to allow decant from the digester and the drying beds back to the headworks.

At the headworks, raw sewage passes through a manual bar screen and grit chamber. Screenings are sent down a chute to a container at ground level. The main treatment units for this facility are two sequencing batch reactor (SBR) basins and a digester which allow for aeration, mixing, anoxic and decanting of influent. Currently, about four and half cycles occur per day according to the on-site permittee representative. Following the SBR treatment units, flow enters a rectangular covered flow equalization (EQ) basin. The EQ basin is covered to minimize algal growth in the effluent prior to discharge.

Not every decant cycle from the SBRs result in a discharge at Outfall 001. When the combined SBR decant level in the EQ basin reaches approximately 24 inches, the flows continues in a pipe to the Ultra Violet (UV) disinfection system. The UV system, 6 banks with 4 bulbs each, is always running and some effluent remains in the UV channel. Standing effluent in the UV channel is disinfected until the next batch discharge occurs according to the on-site permittee representative. After the UV channel, flow continues to a Parshall flume, which is a 9" Parshall flume with a 3" insert to allow measurement of low flows. After the flume, effluent flows through a pipe to Outfall 001.

Below the outfall, a blue-green material or residue was observed along the banks of the effluent tributary to Cuchillo Negro Creek. Both City of Truth or Consequences and City of Elephant Butte are cooperators within the Sierra Soil & Water Conservation District (SWCD) Cooperative Weed Management Area (CWMA). According to Mr. Bill Sallee, Noxious Weed Technician, Sierra SWCD who was contacted by telephone after the inspection (575-894-2212), SWCD had applied pesticide, in this case herbicide, in this area for salt cedar management.

Effluent continued in the tributary to Cuchillo Negro Creek. Cuchillo Negro Creek above the WWTP was not flowing on the day of this inspection. Effluent continued to flow in Cuchillo Negro Creek for approximately 200 feet until the flow infiltrated. The City of Elephant Butte, Sierra County Regional WWTP also has a State of New Mexico Groundwater Quality Bureau (GWQB) Discharge Permit (DP-1594).

Solids Management

Sludge produced at the plant is placed in two divided (four concrete cell) drying beds for dewatering. On the day of this inspection, the drying beds had not been decanted and the beds had standing water. The on-site permittee representative described manual methods to control when sludge was sent to the beds and to clean around the screens to allow the beds to decant. The City rents equipment to remove sludge from the drying beds. Screenings removed from the bar screen were also transported and disposed with the dried sewage sludge.

The report for the last CEI on 07/27/2011 indicated that sludge was sent to an agricultural property. The previous certified operator, Jerry Bonner, Wastewater Utility Operator IV, no longer works at the WWTP since 04/02/2012. Permittee representatives during this inspection did not have knowledge that sludge was sent to any other place than a Municipal Solid Waste Landfill (MSWLF). According to on-site representatives, a private company (Bar-2 Sand & Gravel, Inc., Truth or Consequences, New Mexico) was hired to transport sludge and screenings generated at the plant to the Truth or Consequences (T or C) Landfill. On-site record keeping included tickets from the hauler on the quantity and weight of sludge and landfill receipts. According to the City Manager, sludge may have been transported to the Sierra County landfill at one time, but the County landfill is now closed. According to the permittee representatives, the landfill(s) did not require testing prior to disposal, but sewage sludge and screenings

were tested--Toxicity Characteristic Leaching Procedure (TCLP) and paint filter liquid tests, respectively--by the Permittee.

In the State of New Mexico, sewage sludge is considered a Special Waste. T or C landfill is a registered MSWLF that once, but no longer, accepts special waste sludge. Arrangements to transport sludge generated by the facility to a MSWLF accepting special waste sludge had not been finalized on the day of this inspection according to the on-site permittee representative.

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

Section A - Permit Verification – Overall Rating of "M = Marginal"

Permit Requirements for Permit Verification

Part III.D.9 (Standard Conditions, Other Information) of the permit 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.*

Part III.A.4 (Standard Conditions, Duty to Reapply) of the permit states:

> *If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The application shall be submitted at least 180 days before the expiration date of this permit. The Director may grant permission to submit an application less than 180 days in advance but no later than the permit expiration date. Continuation of expiring permits shall be governed by regulations promulgated at 40 CFR Part 122.6 and any subsequent amendments.*

Findings for Permit Verification

The permit does not list the permittee operating the WWTP, in this case, the City of Elephant Butte.

At the time the permit became effective, the outfall had not been constructed. The discharge location in the permittee's 2005 and 2012 applications; and on the permit is Latitude 33° 09' 22", Longitude 107° 14' 01". The following is the constructed Outfall 001 location based on Google Earth imagery (see Figure 1):

Outfall 001	Decimal Degrees	Degrees, Minutes, Seconds
Latitude	33.154450°	33° 9' 16.02" N
Longitude	-107.231161°	107° 13' 52.18" W

The permit renewal application submittal deadline (180 days before permit termination) was 02/02/2012. USEPA letters dated 04/10/2012 and 05/17/2012 indicated that the City of Elephant Butte NPDES application received on 02/28/2012 and additional information received on 04/26/2012 was administratively complete. NMED SWQB files do not contain USEPA documentation that the Permittee was granted permission to submit an application less than 180 days in advance of the expiration date.

Section B - Recordkeeping and Reporting Evaluation – Overall Rating of "U = Unsatisfactory"

Permit Requirements for Recordkeeping and Reporting

Part III.C.4 (Standard Conditions, Record Contents) of the permit states:

Records of 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.

Findings for Recordkeeping and Reporting

City of Elephant Butte submits hard copy (paper) Discharge Monitoring Reports (DMR). Information and contacts for the USEPA national tool to electronically submit DMRs (called NetDMR) at http://www.epa.gov/netdmr was provided to the permittee representatives following this inspection. USEPA does not require minor facilities to submit DMRs electronically at this time, but it is encouraged.

The following reported analytical results and measurements were not consistent with calculated results or USEPA guidance (see Table 2):

- Reported 30-day average for E.coli (15.4 CFU/100 ml) was not the calculated geometric mean (8.1 CFU/100 ml) of the three laboratory results for samples collected in April 2012. DMRs indicate reporting of 30 day average geometric mean (labeled 30DAVGEO), not arithmetic average.
- Reported 7-day averages for 5 day Biochemical Oxygen Demand (BOD5) on the April 2012 DMR were not the highest weekly averages of the three laboratory results and calculated loadings for samples collected in April 2012.
- Reported 7-day average Total Suspended Solids (TSS) concentration on the April 2012 DMR was reported to be 8.0 mg/L, but the highest weekly average of the three laboratory results for samples collected in April 2012 was 16.0 mg/L.
- Reported 7-day average flow measurements were not calculated correctly per USEPA guidance. According to the on-site permittee representative, an arithmetic average of the daily flow results for only the last 7 days of the month were reported as the 7-day average flow for the entire month since April 2012. The method to calculate 7-day average flow prior to April 2012 was not known by the on-site representative.

  Comment: USEPA Region 6 NPDES Reporting Requirements Handbook Revised August 25, 2004 states: *"How do I calculate and report 7-day averages? We recognize that calendar weeks and calendar months rarely coincide. Therefore, for the purpose of calculating and reporting 7-day averages, you should follow the process below: a. Define your week (SUN-SAT, MON-SUN, etc.). b. Calculate the averages of all sample data obtained for each week. c. The highest calculated weekly average will be reported on the DMR for the month in which (1) the week ends or (2) the week begins, or (3) the month which contains the greatest number of days. It is the choice of the facility. However, the choice should be consistent month to month, year to year. SET A RULE AND STICK WITH IT."*

Section C - Operations and Maintenance – Overall Rating of "M = Marginal"

Permit Requirements for Operations and Maintenance

Part I.E (Pollution Prevention Requirements) of the permit states:

> *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.*

Part III.B.3.b (Standard Conditions, Proper Operation and Maintenance) 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

Written documentation of a pollution prevention program including the nine (9) items (A thru I) listed above was not readily available and/or provided for review during this inspection.

An adequate number of qualified operators did not appear to be provided. City of Elephant Butte has one certified operator. Three other staff work at the plant and/or maintain lift stations. But, there was no back up for the certified operator in case of leave.

Written procedures for emergency treatment control (e.g., alternative disinfection in case the UV system goes down, spills, lift station and sanitary sewer overflows) were not readily available and/or provided for review during this inspection.

Brown foam and solids were observed in the EQ basin. No brown foam was observed in the effluent at the flume or below the outfall on the day of this inspection. Additional maintenance appeared needed to minimize brown foam and floatable solids observed in the EQ basin and potential for discharge of foam and solids at the outfall. In addition, the potential for solids to flow thru the UV system may increase maintenance of the banks or bulbs.

Section D - Self-Monitoring – Overall Rating of "U = Unsatisfactory"

Permit Requirements for Self-Monitoring

Part I.A Footnote 3 of the permit states, *"The maximum TRC shall be monitored by instantaneous grab samples once per day only when using chlorine for either bacteria control in the effluent or when chlorine is being used in any of the wastewater treatment systems for cleaning and/or filamentous bacteria control in the settling basins."*

Part III.C.2 (Standard Conditions, Representative Sampling) of the permit states:

> *Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.*

Part III (Municipal Terms) of the permit states:

> *3-HOUR COMPOSITE SAMPLE consists of three effluent portions collected no closer together than one hour (with the first portion collected no earlier than 10:00 a.m.) and composited according to flow.*

Findings for Self-Monitoring

Some sample collection procedures were not documented. For example, the on-site permittee representative verbally described collection procedures to ensure that a sufficient length of time had passed after the start of EQ basin decant. There were no plant-specific written sample collection procedures readily available or provided for review to ensure that representative samples were collected.

Samples for BOD5 and TSS were collected and analyzed, but a three (3) hour composite sample was not collected according to the on-site permittee representative. Composites for BOD5 and TSS were obtained earlier than 1000 hours. The time for the 1st sample was recorded on daily logs after April 2012. If a 2nd batch discharge occurred within three hours of the first, then a 2nd grab sample was collected. Flow at the time of sample collection was not measured or used to composite the set. If a 2nd grab was collected, equal amounts were used in the composite. The last collection time would be recorded on chain of custody (COC) forms. Grab samples of a 2nd or 3rd batch discharge (if any) during the sampling day were not collected and composited according to flow.

Required Total Residual Chlorine (TRC) monitoring during use of chlorine was not reported on DMRs prior to April 2012. Chlorine products Induclor 70 and Dixichlor had been used to control filamentous bacteria in the treatment system prior to April 2012 according to the on-site permittee representative. The timeframe(s) for the use of chlorine was not known, not documented and/or records were not readily available according to the on-site permittee representative.

Specific E.coli bacteria dechlorination procedures were not documented on reviewed COC forms. Reported results for E.coli bacteria monitoring during the described use of Chlorine in the treatment system prior to April 2012 would not be valid if the samples were not properly preserved (de-chlorinated).

Type of sample container (e.g., polyethylene) was not documented on reviewed COC forms.

Section E - Flow Measurement – Overall Rating of "M = Marginal"

Permit Requirements for Flow Measurement

Part III, Section 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, Section C.6 of the permit states:

> *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 the 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 than 10% from true discharge rates throughout the range of expected discharge volumes.*

Findings for Flow Measurement

Routine calibration checks (e.g., using flume staff gage readings and established discharge tables) were not done to assure continued compliance between yearly calibrations. Some algal growth was on the surface of the flume. Some turbulence of the flow was also observed in the flume. Cleaning appeared needed to help ensure smooth water flow. Accurate flow measurement data is important, because the data is to be used in loading calculations and to determine composite sample volumes.

Section F – Laboratory – Overall Rating of "U = Unsatisfactory"

Permit Requirements for Laboratory

Part III.B.3.a (Standard Conditions, Proper Operation and Maintenance) of the permit states:

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

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

> *a. 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.*
>
> *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 Laboratory

USEPA approved analytical procedures in 40 CFR 136.3 were not recorded to be used for BOD5 monitoring. Aqua Environmental Testing Laboratory Chemistry Report for effluent samples collected April 10, April 19 and April 30, 2012 indicate use of EPA Method 405.1 to analyze BOD5. This method was withdrawn in March of 2007 (Federal Register/Vol. 72, No. 47/Monday, March 12, 2007/Rules and Regulations). **This is a repeat finding** for contract laboratories of this Permittee.

It was also noted that record keeping (bench sheets) for pH calibration and monitoring had not been updated with the latest approved Standard Method (SM). Record keeping indicated SM 18th Edition. The pH method in SM 18 was approved in 1990. In 40 CFR 136.3 effective June 18, 2012 (Federal Register / Vol. 77, No. 97 / Friday, May 18, 2012 / Rules and Regulations), approved Standard Methods include the year of approval, in this case for pH, SM 4500–H+ B–2000.

Record keeping for pH monitoring conducted on 01/08/2013 did not include a 3rd buffer standardization prior to sample analysis as required by Standard Methods 4500–H+ B–2000. Permittee representatives were informed during the exit interview by this inspector that additional samples could be collected in January 2013, analyzed in accordance with an approved method, to meet permit requirements.

Duplicate samples for pH were not collected and analyzed at the on-site laboratory by the Permittee. Duplicate samples were not sent to contract laboratories. According to EPA's NPDES Inspection Manual, *"10 percent of the samples should be duplicated."* Also, reviewed laboratory reports did not include quality control/quality assurance results (e.g., results for spiked samples analyzed by contract laboratories) to verify accuracy of the analytical procedures.

Section G - Effluent/Receiving Waters Observations. – Overall Rating of "M = Marginal"

Permit Requirements for Effluent / Receiving Waters

Part I.A of the permit states, *"There shall be no discharge of floating solids or visible foam in other than trace amounts."*

Findings for Effluent / Receiving Waters

Some white foam was observed in the flow at the flume and in the receiving water below the outfall. Algal growth in the flume and in the effluent tributary may be a sign of excessive nutrients. The reported 7-day average (7 DA AVG) effluent limit for TSS was exceeded in February 2011 during cold temperatures (settling problem in SBR and filamentous bacteria bulking problem). As previously discussed, TRC concentrations of the effluent during described use of Chlorine in the treatment system prior to April 2012 were not monitored. It is not documented if E.coli bacteria monitoring during the described use of Chlorine in the treatment system prior to April 2012 are valid.

Section H - Sludge Disposal – Overall Rating of "M = Marginal"

Permit Requirements for Sludge Disposal

Part IV (Element 3 - Municipal Solid Waste Landfill, Disposal Section I Requirements Applying to All Municipal Solid Waste Landfill Disposal Activities) of the permit states:

> *3. If the permittee generates sewage sludge and supplies that sewage sludge to the owner or operator of a MSWLF for disposal, the permittee shall provide to the owner or operator of the MSWLF appropriate information needed to be in compliance with the provisions of this permit.*
>
> *6. Recordkeeping requirements - The permittee shall develop the following information and shall retain the information for five years. The sludge documents will be retained on site at the same location as other NPDES records. a. The description and results of the tests performed, required by the owner/operator of the MSWLF to demonstrate compliance with the 40 CFR 258 regulations. b. certification that sewage sludge meets the requirements in 40 CFR 258 concerning the quality of the sludge disposed in a municipal solid waste landfill unit.*

Findings for Sludge Disposal

The Permittee did not have a readily available certification record(s) that sewage sludge going to a MSWLF met requirements in 40 CFR 258. Also, the Permittee did not have readily available records that testing information was provided to the owner or operator of the MSWLF. Additional requirements and information for sludge generators can be obtained from NMED Solid Waste Bureau (SWB) Harold

Runnels Building Room S2050, 1190 St. Francis Drive – P.O. Box 5469 Santa Fe, New Mexico 87502-5469, 505-827-0197. NMED SWB also has the following guidance document:

http://www.nmenv.state.nm.us/swb/documents/SludgeDMPGuidelines_3-15-2011.pdf

Table 1: NM0030864, Sierra County, Summary of DMRs

	BOD				pH		TSS				e.Coli		Flow
Limit	**150.1**	**225.2**	**30**	**45**	**6.6**	**9**	**150.1**	**225.2**	**30**	**45**	**548**	**2507**	
	30 DA AVG	**7 DA AVG**	**30 DA AVG**	**7 DA AVG**	**MIN**	**MAX**	**30 DA AVG**	**7 DA AVG**	**30 DA AVG**	**7 DA AVG**	**30 DAVGEO**	**Daily Max**	**30 DA AVG**
Units	**lbs/day**	**lbs/day**	**mg/L**	**mg/L**	**su**	**su**	**lbs/day**	**lbs/day**	**mg/L**	**mg/L**	**CFU/100 mL**	**CFU/100 mL**	**MGD**
Dec-12	1.30	1.30	3.38	3.38	7.19	7.71	1.23	1.31	3.2	3.2	8	20.3	0.0455
Nov-12	1.27	1.40	3.37	3.65	7.57	7.67	1.83	3.03	4.87	8.00	6.15	12.0	0.04792
Oct-12	1.8	2.14	4.81	3.26	7.58	7.67	2.01	2.05	5.3	5.0	7.92	95.7	0.047467
Sep-12	1.74	1.83	2.83	2.17	7.52	7.71	2.60	2.96	4.17	3.50	4.07	10.2	0.065526
Aug-12	2.04	2.37	4.07	4.50	7.60	7.74	2.73	3.39	5.51	6.52	12.23	33.7	0.06434
Jul-12	2.22	3.19	4.23	5.41	7.53	7.6	5.05	7.31	10.14	13.2	<1	<1	0.0711
Jun-12	3.22	4.3	6.28	8.00	7.6	7.67	3.6	5.6	6.9	10.4	4.5	6.3	0.065
May-12	4.2	5.5	8.99	6.49	7.59	7.63	5.0	3.7	10.50	6.40	8.1	12.3	0.06041
Apr-12	4.91	3.02	9.98	9.14	7.36	7.63	5.13	7.86	10.3	8.0	15.4	24.2	0.05761
Mar-12	2.88	3.06	7.0	7.0	7.36	7.63	1.2	3.18	3.3	1.0	1.0	1.0	0.06878
Feb-12	2.28	2.77	5.3	6.0	7.28	7.35	1.02	1.85	2.3	4.0	1.0	1.0	0.05538
Jan-12	3.51	4.07	7.7	8.0	7.27	7.50	2.54	5.95	5.77	13.5	1.65	4.5	0.05713
Dec-11	4.19	6.14	6.3	7.0	7.35	7.41	1.84	2.51	3.2	5.0	3.7	6.0	0.06468
Nov-11	2.19	2.74	5.3	7.0	7.40	7.56	0.75	0.98	1.8	2.5	1.0	3.0	0.05744
Oct-11	2.01	2.13	4.70	5.0	7.54	7.57	0.43	0.46	1.0	1.0	0.33	1.0	0.05559
Sep-11	2.35	3.37	5.7	8.0	7.56	7.66	1.41	2.57	3.3	6.0	23	44	0.05616
Aug-11	2.62	4.20	6.0	10.0	7.49	7.65	3.24	7.63	6.83	15.5	21	47	0.05709
Jul-11	5.71	8.11	10.0	13.0	7.49	7.63	5.16	6.89	9.67	15.0	4.3	12.0	0.06488
Jun-11	6.2	12.7	13.8	31.0	7.39	7.53	6.6	7.9	14.0	19.0	405	1500	0.05824
May-11	1.7	2.6	4.3	5.5	7.36	7.50	2.6	3.8	7.2	12.0	4.0	11.0	0.05451
Apr-11	2.53	3.71	6.8	11.0	7.34	7.75	4.63	6.49	12.1	14.8	24.3	82	0.04767
Mar-11	1.27	1.40	3.37	3.65	7.57	7.67	1.83	3.03	4.87	8.00	6.15	12.0	0.04792
Feb-11	5.64	8.27	14.7	19.0	7.53	7.63	11.08	22.19	27.7	**51.0***	173	420	0.04688
Jan-11	1.62	1.83	6.3	6.8	7.09	7.50	2.45	3.51	9.27	11.5	11	28	0.04168

*reported exceedance

Table 2: Calculation Checks for April 2012 DMR

E.coli Check

Reported Daily Max = 24.2 CFU/100 ml
Reported 30 Day Ave Geometric Mean = 15.4 CFU/100 ml (Incorrect Calculation/Reporting)

Sample Collection Date	Result
04/10/12	22.1 CFU/100 ml
04/19/12	24.2 CFU/100 ml*
04/30/12	<1 CFU/100 ml

Daily Max = 24.2 CFU/100 ml
Calculated 30 Day Geometric Mean = 8.1 CFU/100 ml

BOD5 Check

	Concentration	Loading
Reported 7 Day Average	9.14 mg/L	3.02 lbs/day (Incorrect Reporting)
Reported 30 day Average	9.98 mg/L	4.91 lbs/day

Sample Collection	Result	Loading Calculation
04/10/12	15.4 mg/L*	15.4 mg/L x 0.0589 MGD x 8.34 lbs/gal = 7.56 lbs/day*
04/19/12	9.14 mg/L	9.14 mg/L x 0.05437 MGD x 8.34 lbs/gal = 4.14 lbs/day
04/30/12	5.41 mg/L	5.41 mg/L x 0.06698 MGD x 8.34 lbs/gal = 3.02 lbs/day
7 Day Average	15.4 mg/L	7.56 lbs/day
Calculated 30 day Average	9.98 mg/L	4.91 lbs/day

TSS Check

Reported 7 Day Average	8.0 mg/L	7.86 lbs/day (Incorrect Concentration Reporting)
Reported 30 Day Average	10.3 mg/L	5.13 lbs/day

Sample Collection	Result	Loading Calculation
04/10/12	16.0 mg/L*	16.0 mg/L x 0.0589 MGD x 8.34 lbs/gal = 7.86 lbs/day*
04/19/12	8.00 mg/L	8.00 mg/L x 0.05437 MGD x 8.34 lbs/gal = 3.63 lbs/day
04/30/12	7.00 mg/L	7.00 mg/L x 0.06698 MGD x 8.34 lbs/gal = 3.91 lbs/day
7 Day Average	16.0 mg/L	7.86 lbs/day
Calculated 30 Day Average	10.3 mg/L	5.13 lbs/day

Figure 1: Facility Location

Map Prepared by: Erin S. Trujillo		
City/County: City Limits of Truth or Consequences / Sierra County		State: New Mexico
Location: City of Elephant Butte, Sierra County Regional WWTP, NM0030864		
Subject: Outfall 001 Location		

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Erin S. Trujillo	Date: 01/10/2013	Time: 1141 hours
City/County: Truth or Consequences / Sierra County		State: New Mexico
Location: City of Elephant Butte, Sierra County Regional WWTP - North, NM0030864		
Subject: Some white form in effluent, algal growth on surface of flume, and turbulence of flow.		

NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Erin S. Trujillo	Date: 01/10/2013	Time: 1156 hours
City/County: Truth or Consequences / Sierra County		State: New Mexico
Location: City of Elephant Butte, Sierra County Regional WWTP - North, NM0030864		
Subject: Effluent below Outfall 001		

NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Erin S. Trujillo	Date: 01/10/2013	Time: 1157 hours
City/County: Truth or Consequences / Sierra County		State: New Mexico
Location: City of Elephant Butte, Sierra County Regional WWTP, NM0030864		
Subject: Effluent tributary below outfall		

NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: Erin S. Trujillo	Date: 01/10/2013	Time: 1159 hours
City/County: Truth or Consequences / Sierra County		State: New Mexico
Location: City of Elephant Butte, Sierra County Regional WWTP, NM0030864		
Subject: Arrow points to some white foam in effluent tributary below Outfall 001. Algal growth also observed.		

NMED/SWQB
Official Photograph Log
Photo # 5

Photographer: Erin S. Trujillo	Date: 01/10/2013	Time: 1201 hours
City/County: Truth or Consequences / Sierra County		State: New Mexico
Location: City of Elephant Butte, Sierra County Regional WWTP, NM0030864		
Subject: End of effluent flow in Cuchillo Negro Creek on day of this inspection		