



NEW MEXICO
ENVIRONMENT DEPARTMENT



Surface Water Quality Bureau

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DAVE MARTIN
Secretary

BUTCH TONGATE
Acting Deputy Secretary

Certified Mail - Return Receipt Requested

September 21, 2011

Honorable Tracy Boyce
Mayor
Village of Cimarron
P.O. Box 654
Cimarron, NM 87714

**Re: Minor Municipal; SIC 4952; NPDES Compliance Evaluation Inspection; Village of Cimarron
Wastewater Treatment Plant; NM0031038; August 23, 2011**

Dear Mayor Boyce:

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.

I wish to thank you for your cooperation and the cooperation of the Village of Cimarron representatives Ms. Mindy Cahill, Mr. Leo Martinez and Mr. Damian Casias during the inspection. If you have any questions about this inspection report, please contact me at (505) 827-0212.

Sincerely,

Barbara Cooney
Surface Water Quality Bureau

cc: Marcia Gail Adams, USEPA (6EN-AS) by e-mail
Samuel Tate, USEPA (6EN-AS) 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
Sonia Hall and Hannah Branning, USEPA (6EN-WC)
NMED District II Manager by e-mail

SECTION A - PERMIT VERIFICATION

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

DETAILS: The Village Clerk has retired and a new signatory is needed. There is a new Mayor.

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE Y N NA

2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES Y N NA

3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT Y N NA

4. ALL DISCHARGES ARE PERMITTED Y N NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. S M U NA (FURTHER EXPLANATION ATTACHED YES)

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 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 YES)
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. Y N NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. Y N NA
4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION NONE) Y N NA
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES. Y N NA
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. Y N NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. Y N NA
6. HEAD MEASURED AT PROPER LOCATION. Y N NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES. Y N NA

SECTION F - LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED NO)
 DETAILS: LABORATORY NOT EVALUATED BECAUSE - THERE HAS BEEN NO SAMPLING NOR ANALYSIS SINCE THIS PERMIT WAS ISSUED

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 YES).

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

RECEIVING WATER OBSERVATIONS
 There was no discharge at the time of this inspection. The berms of the lagoons appeared to be leaking or otherwise discharging at the outfall in the recent past, due to the very heavy vegetative growth of wetlands type plants (including cattails) at the outfall.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED YES).
 DETAILS:

- 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. S M U NA
- 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. S M U NA
- 3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: NONE (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

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Introduction

On August 23, 2011 a Compliance Evaluation Inspection (CEI) was conducted at the Village of Cimarron Wastewater Treatment Plant (WWTP) by Barbara Cooney of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB).

The inspection was conducted by NMED for the US Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the federal Clean Water Act. These inspections are conducted under contract with the USEPA and are used by EPA to evaluate compliance with the NPDES permit program. This inspection report is based on information supplied by the Village of Cimarron representatives (the permittee), observations made by the NMED inspector, reports and records kept by the permittee and/or NMED.

The Village of Cimarron WWTP is classified as a minor municipal discharge with a design flow of 0.0083 MGD. The discharge for the WWTP enters French Lake, a tributary to the Cimarron River in water quality segment 20.6.4.306 NMAC, at Latitude 36° 30' 28" North, Longitude 104° 53' 45" West. The Designated Uses for this segment of the river are: irrigation, warmwater aquatic life, livestock watering, wildlife habitat and primary contact.

Inspection Details

The inspector arrived at the Village of Cimarron administrative offices at 12:30 hours and met with Ms. Mindy Cahill, Village Clerk/Administrator and Mr. Leo Martinez, Village Maintenance and Plant Operator. The inspector presented credentials and explained the purpose of the inspection. A records review was conducted at the offices. Mr. Martinez and Mr. Damian Casias - also of the Village Maintenance Department and Plant Operator, accompanied the inspector on a tour of the facility. An exit interview was then conducted with Ms. Cahill and Mr. Martinez at the Village Office. The inspector left the Village of Cimarron facilities at 14:51 hours.

Treatment Scheme

The Village of Cimarron WWTP serves a population of approximately 950 people. According to Village representatives, 540 hook-ups are served by the drinking water distribution system. Raw sewage flows by gravity through the collection system. One lift station is located on the south side of town. The raw sewage enters the WWTP through a 4" to 6" Parshall Flume where a wooden stick is used as the staff gauge to measure influent flow. The staff gauge affixed to the wall is coated with debris and is unreadable. The raw sewage is split between two lagoons. One lagoon has a small "Solar Bee" mixing unit anchored in the center. This does not actually provide any aeration; it simply mixes a small section of the solids and water in the lagoon. Each lagoon is roughly 2 acres in size followed by two small sand filters designated for each lagoon then through a 6 inch Parshall Flume that has no staff gauge to the outfall at French Lake. Five to six feet of free board was observed in both lagoons. The stains that show the high water mark on the sidewalls is less than two feet from the top of the cement liners in the lagoons. The wastewater system has no observable disinfection system.

Sludge Handling

Extremely high levels of solids are present in both lagoons. Around the edges, solids are so thick that plants have taken root and are growing in the lagoons. It appears that solids have never been wasted. There are no sludge drying beds at the site. According to facility representatives, with the current treatment units, solids would have to be hauled to an offsite location for processing and disposal. According to Cimarron representatives, the nearest location for solids disposal is in Colorado.

Further Explanations

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.

Permit Verification

Overall Rating For Permit Verification (Satisfactory)

Permit Requirements For Permit

The Permit Requires in Part III.D.11. REPORTING REQUIREMENTS and SIGNATORY REQUIREMENTS:

All applications, reports, or information submitted to the Director Shall be signed and certified.

(1) ALL PERMIT APPLICATIONS shall be signed as follows:

(3) FOR A MUNICIPALITY, STATE, FEDERAL, OR OTHER PUBLIC AGENCY - by either a principal executive officer or ranking elected official. For the purpose of this section, a principal executive officer of Federal agency includes: (a) The chief executive officer of the agency, or (b) senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency.

b. ALL REPORTS required by the permit and other information requested by the Director shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if: (1) The authorization is made in writing by a person described above; (2) The authorized specifies either an individual or position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, or position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company. A duly authorized representative may thus be either a named individual on an individual occupying a named position; and, (3) The written authorization is submitted to the Director.

c. CERTIFICATION Any person signing a document under this section shall make the following certification: "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure the qualified personnel properly gather and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or the persons directly responsible for gather the information, the information submitted is, to the best of my knowledge and belief, true, accurate,

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and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Findings for Permit

Mindy Cahill Village Clerk/Administrator was the signatory authority for this permit and has now retired from her position with the Village of Cimarron. The Village shall send a letter to both EPA and NMED identifying the person who is now responsible for signing permit applications and reports.

Record Keeping and Reporting

Overall Rating For Record Keeping and Reporting (Unsatisfactory)

Permit Requirements For Recordkeeping and Reporting

The permit requires in Part I. D. MONITORING AND REPORTING (MINOR DISCHARGERS)

Monitoring information shall be on Discharge Monitoring Reports Form(s) EPA3320-1 as specified in Part III.D.4 of the permit and shall be submitted quarterly. Each quarterly submittal shall include separate forms for each month of the reporting period.

1. Reporting periods shall end on the last day of the months March, June, September, and December.

2. The permittee is required to submit regular quarterly reports as described above postmarked no later than the 28th day of the month following each reporting period.

3. If any 7-day average or daily maximum value exceeds the effluent limitations specified in Part I.A, the permittee shall report the excursion in accordance with the requirements of Part III.D.

4. Any 30-day average, 7-day average, or daily maximum value reported in the required Discharge Monitoring Report which is in excess of the effluent limitation specified in Part I.A. shall constitute evidence of violation of such effluent limitation and of this permit.

The Discharge Monitoring Form Instructions state:

11. If "no discharge" occurs during monitoring period, enter "No Discharge" across form in place of data entry.

The permit requires in Part III.C. RETENTION OF RECORDS:

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instruments, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the data of the samples, measurement, report, or application. This period may be extended by request of the Director at any time.

The permit requires in Part III.C.4. RECORDS CONTENT:

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;*

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- d. The individual(s) who performed the analyses;
- e. The analytical technique or methods used; and
- f. The results of such analyses.

The Permit Requires in Part III. A.8. CRIMINAL AND CIVIL LIABILITY:

Except as provided in permit conditions on "Bypassing" and "Upsets", nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance. Any false or materially misleading representation or concealment of information required to be reported by the provisions of the permit, the Act, or applicable regulations, which avoids or effectively defeats the regulatory purpose of the Permit may subject the Permittee to criminal enforcement pursuant to 18 U.S.C. Section 1001.

Findings For Record Keeping and Reporting

1) Submittal of Discharge Monitoring Reports (DMRs) for this facility became a requirement on the effective date of this permit, October 1, 2009. Even during months when "No Discharge" occurs, these reports must be submitted, with no discharge noted. These DMRs must be filled out for each month and submitted quarterly.

2) DMR forms beginning October 2009 through September 2011 were not received by NMED until August 8, 2011.

3) DMRs for the months of August 2011 and September 2011 were filled out and signed on August 12, 2011. Reports cannot be filled out and submitted in advance. The actual monitoring period must have ended to correctly validate that "no discharge" occurred.

4) The permittee stated that no discharge has ever occurred during the period of October 2009 through October 2011. Facility representatives state that due to the severe drought, the liquid portion of the wastewater lagoons have evaporated necessitating no need for discharge nor for effluent monitoring. It is noted that a severe drought has occurred in New Mexico and in the Cimarron area in 2011. However prior to 2011, both average and above averages of snowfall and rainfall were present in the area.

Observations made at the WWTP by the inspector indicate that discharges have in fact occurred contrary to statement made by facility representatives. Those observations included the low water level of the lagoons, with approximately six feet of free board observed during the inspection. When NMED made observations of the lagoons prior to the effective date of the permit in 2009, only 2 feet of freeboard in the lagoons was evident. This claim by facility representatives would necessitate an evaporative rate far in excess of that normally found in other parts of the state of New Mexico during the same period, as observed by this inspector. Additionally, the outfall location had very heavy growth of wetlands types of plants that were not present anywhere else along the bottom of the berm of the WWTP. These wetland plants include cattails and reeds. The inspector notes that vegetation was growing on the other portions of the berms but not wetland type species. The inspector also notes that no discharge was occurring at the time of the inspection.

Operation and Maintenance

Overall Rating For Operation and Maintenance (Unsatisfactory)

Permit Requirements For Operation and Maintenance (O&M)

The permit requires in Part III.B.3. PROPER OPERATIONS AND MAINTENANCE:

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

b. The permittee shall provide an adequate operation staff which is duly qualified to carry out the operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

Findings for Operation and Maintenance

1) The lagoons are heavily loaded with solids. It appears that solids have never been wasted from this facility. There is very little capacity left in the lagoons because of the extreme solids build up. According to facility representatives, to remove solids and transport them to another facility for processing will cost over \$100,000.00. There are no sludge drying beds at this location.

2) Weeds were growing in the lagoons through the cracks in the cement liners.

3) Rodents have burrows along the berms of the lagoons weakening the structures.

4) There are no written operating procedures in place.

5) The WWTP has no power so no alarm system is required indicate failure of mechanical treatment units, with the exception of the lift station in town. The lift station was not investigated as part of this inspection.

Self-Monitoring

Overall Rating For Self Monitoring (Unsatisfactory)

Permit Requirements and Findings for Self-Monitoring

See Comment 4. of the Record Keeping and Reporting section of this report.

Flow Measurement

Overall Rating For Flow Measurement (Unsatisfactory)

Permit Requirements For Flow Measurements:

The permit requires in Part III C. 6. FLOW MEASUREMENTS:

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 flow with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.

Findings For Flow Measurement

The effluent Parshall Flume does not have a readable staff gauge. There were no records of calibration.

The influent staff gauge and Parshall Flume were heavily coated with dried debris. The staff gauge was unreadable. Operators indicated that a wooden stick, without any measurement markers was used to estimate the depth of the influent flow.

Laboratory

Overall Rating For Laboratory (NA)

Permit Requirements For Laboratory

The permit requires in Part III. C. 5. MONITORING PROCEDURES

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.

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.

Findings For Laboratory

Laboratory Procedures and Records were not evaluated because no sampling has been done nor reported since the effective date of this permit.

Effluent and Receiving Waters

Overall Rating For Effluent and Receiving Water (Not Evaluated)

Sludge Handling and Disposal

Overall Rating For Sludge Handling and Disposal (Unsatisfactory)

Permit Requirements For Sludge Handling/Disposal

The permit requires in Part III.B.3. PROPER OPERATIONS AND MAINTENANCE:

a. The permittee shall at all times properly operate and maintain all facilities and systems of the treatment and control (and related appurtenances) which are installed or used by permittee as

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efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit.

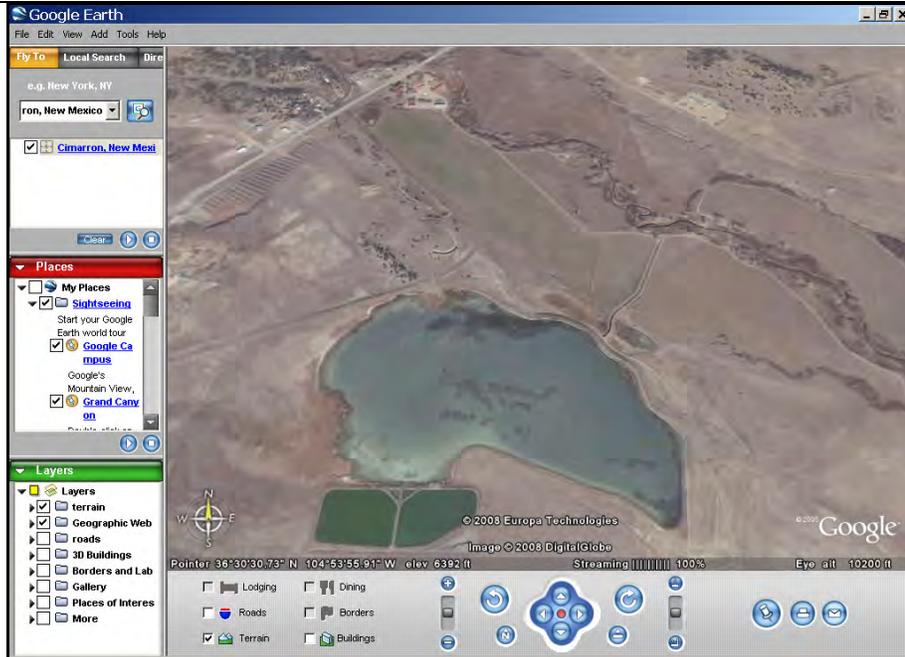
Findings For Sludge Handling

The lagoons are heavily loaded with solids. It appears that solids have never been wasted from this facility. There is very little capacity left in the lagoons because of the extreme solids build up. According to facility representatives, to remove solids and transport them to another facility for processing will cost over \$100,000.00. There are no sludge drying beds at this location.

(note: This is the same comment as found in the Operation and Maintenance Section of this report.)

**NMED/SWQB
Official Photograph Log
Photo # 1**

Photographer: Google Earth	Date: 2008	Time: unknown
City/County: Cimarron / Colfax		State: New Mexico
Location: Cimarron Wastewater Treatment Plant at French Lake		
Subject: Aerial Photo of WWTP		



**NMED/SWQB
Official Photograph Log
Photo # 2**

Photographer: B. Cooney	Date: 2011 Aug 23	Time: 14:06 hours
City/County: Cimarron / Colfax		State: New Mexico
Location: Cimarron WWTP		
Subject: Parshall Flume at head works with an approximately 3" throat width. Note the debris along the side wall is so built up that the staff gauge cannot be read. The operator uses a wooden stick he places in the bottom of the flume to guess the depth of the influent. He then extrapolates the flow rate.		



NMED/SWQB
Official Photograph Log
Photo #3

Photographer: B. Cooney

Date: 2011 Aug 23

Time: 14:07 hours

City/County: Cimarron / Colfax

State: New Mexico

Location: Cimarron WWTP

Subject: Stick used by operators to measure depth of flow though the Parshall flume.



NMED/SWQB
Official Photograph Log
Photo #4

Photographer: B. Cooney

Date: 2011 Aug 23

Time: 14:09 hours

City/County: Cimarron / Colfax

State: New Mexico

Location: Cimarron WWTP

Subject: West Lagoon from the influent Parshall flume. The outfall where flow from both lagoons is combined and discharge to French Lake is on the far side of the lagoon near the tree seen on the horizon. A Solar Bee mixer is in the center of the lagoon.



NMED/SWQB
Official Photograph Log
Photo # 5

Photographer: B. Cooney

Date: 2011 Aug 23

Time: 14:18 hours

City/County: Cimarron / Colfax

State: New Mexico

Location: Cimarron WWTP

Subject: Lagoon is heavily loaded with solids. Note the solids build up in the corner of the lagoon. The cement liner of the lagoon is cracked and leaking. Note the vegetation growing through the cracks of the lagoon.



NMED/SWQB
Official Photograph Log
Photo # 6

Photographer: B. Cooney

Date: 2011 Aug 23

Time: 14:32 hours

City/County: Cimarron / Colfax

State: New Mexico

Location: Cimarron WWTP outfall to French Lake

Subject: The outfall from the lagoons to French lake. Note the heavy vegetation including riparian plants such as the cattails. Operators state that no discharge has occurred since before October 2009, yet the growth of wetlands plants at the outfall do not support those statements. French lake in the background is being drained for summer irrigation by Vermejo Ranch. During non-irrigation season, the lake extends nearly as close as the outfall from the lagoons. Along the entire outside of the lagoon dikes vegetation was present, the only location where cattails and other wetlands vegetation were observed was at the outfall location.



NMED/SWQB
Official Photograph Log
Photo # 7

Photographer: B. Cooney

Date: 2011 Aug 23

Time: 14:27 hours

City/County: Cimarron / Colfax

State: New Mexico

Location: Cimarron WWTP

Subject: Lagoon dikes and berms have heavy vegetative growth, indicating leaking. Also heavy rodent activity was noted along the lagoon berms also causing break down and adding to the potential for seepage from the lagoons. - The outfall to French lake is near the tree in the background.



NMED/SWQB
Official Photograph Log
Photo # 8

Photographer: B. Cooney

Date: 2011 Aug 23

Time: 14:27 hours

City/County: Cimarron / Colfax

State: New Mexico

Location: Cimarron WWTP

Subject: The berm between the East and West Lagoons is overgrown with vegetation. Also note the duckweed growing and the solids in the lagoon on the left.



NMED/SWQB
Official Photograph Log
Photo #9

Photographer: B. Cooney

Date: 2011 Aug 23

Time: 14:34 hours

City/County: Cimarron /Colfax

State: New Mexico

Location: Cimarron WWTP

Subject: Solids and septic conditions in the East Lagoon.



NMED/SWQB
Official Photograph Log
Photo #10

Photographer: B. Cooney

Date: 2011 Aug 23

Time: 14:34 hours

City/County:

State: New Mexico

Location: Cimarron WWTP

Subject: WWTP lagoons with excessive solids and plants growing in the cement liner of the lagoon.



NMED/SWQB
Official Photograph Log
Photo #11

Photographer: B. Cooney

Date: 2011 Aug 23

Time: 14:23 hours

City/County: Cimarron / Colfax

State: New Mexico

Location: Cimarron WWTP

Subject: Sand filter, not maintained - plants growing - also, sandfilter has water indicating that lagoons had at some time been drained though the sand filter for discharge to French Lake.

