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NEW MEXICO
ENVIRONMENT DEPARTMENT

Surface Water Quality Bureau

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

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

July 15, 2011

Mr. Larry Fry, City Manager
City of Roswell
Post Office Drawer 1838
Roswell, NM 88201

Re: Industrial Storm Water; SIC 4952; NPDES Compliance Evaluation Inspection; City of Roswell Wastewater Treatment Plant; NMU001741; July 7, 2011

Dear Mr. Fry:

Enclosed please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas, for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are discussed in the Further Explanations section of the inspection report. You are encouraged to review the inspection report and 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 USEPA (Diana McDonald, USEPA (6EN-WM), 1445 Ross Ave., Dallas, Texas 75202) and NMED (at above address) regarding modifications and compliance schedules.

The NPDES Storm Water Multi-Sector General Permit for Industrial Activities (MSGP-2008) was reissued on September 29, 2008. The MSGP, fact sheet and other information on the industrial storm water program can be downloaded at <http://cfpub2.epa.gov/npdes/stormwater/msgp.cfm>.

Thank you for your cooperation and assistance during this inspection. If you have any questions about this inspection report, please contact me at (505) 827-1041.

Sincerely,
/s/ Sandra Gabaldon

Sandra Gabaldón
Surface Water Quality Bureau

cc: Marcia Adams, USEPA (6EN-AS) by e-mail
Samuel Tate, USEPA (6SF) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
NMED District II, 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 U 0 0 1 7 4 1 11 12 1 1 0 7 0 7 17 18 ~ 19 S 20 2					
Remarks					
W A S T E W A T E R T R E A T M E N T P L A N T					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 [] [] [] 69	70 2	71 N	72 N	73 [] []	74 75 M A J 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) ROSWELL WWTP – 285 South (Main Street), East on College Boulevard, Follow to end of road to WWTP. CHAVES COUNTY	Entry Time /Date 0810 Hours / 07-07-2011	Permit Effective Date September 29, 2008
	Exit Time/Date 1100 Hours / 07-07-2011	Permit Expiration Date September 29, 2013
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Arthur Torrez, Water and Wastewater Manager (575) 622-1449 Daniel Mendiola, Wastewater Operator III	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Larry Fry, City Manager (575) 637-6240 Post Office Box Drawer 1838 Roswell, NM 88201	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	GPS: N. 33.40829° W. – 104.47920° SIC: 4952 Activity code: TW

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

U	Permit	N	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	U	Storm Water	N	Other:

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

1. FACILITY DID NOT HAVE REQUIRED NPDES PERMIT COVERAGE ON DAY OF INSPECTION.
2. SEE ATTACHED REPORT AND FURTHER EXPLANATION.

Name(s) and Signature(s) of Inspector(s) SANDRA GABALDON /s/Sandra Gabaldon	Agency/Office/Telephone/Fax NMED/SWQB/505-827-1041/827-0160	Date July 15, 2011
Signature of Management QA Reviewer RICHARD E. POWELL /s/ Richard E. Powell	Agency/Office/Phone and Fax Numbers NMED/SWQB/505-827-2798	Date July 15, 2011

City of Roswell Wastewater Treatment Plant
MSGP Compliance Evaluation Inspection
NPDES Permit No. NMU001741
July 7, 2011

Introduction

On July 7, 2011, Sandra Gabaldón of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the City of Roswell, Wastewater Treatment Plant (WWTP) (Standard Industrial Classification 4952, Activity Code TW) in Chaves County, New Mexico. 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 was to document the operator's status regarding the USEPA's NPDES Storm Water Multi-Sector General Permit (MSGP) for Industrial Activities (*this facility has industrial activities being conducted on-site that meet the description of industrial activities in section T*) and storm water regulations at 40 Code of Federal Regulations (CFR) Part 122.26. This inspection report is based on information provided by the Owner/Operator's representatives, observations made by the NMED inspectors, and records and reports kept by the Owner/Operator and/or NMED.

The City of Roswell WWTP has recently updated their old trickling filters to activated sludge. The WWTP has a design flow capacity of 7.0 Million Gallons per Day (MGD) and is classified as a major municipal discharger under the federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. Storm water runoff from this facility discharges to the Rio Hondo thence to the Pecos River in Segment 20.6.4.206 (*State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC)*) of the Pecos River Basin. This segment has designed uses irrigation, livestock watering, wildlife habitat, secondary contact and warmwater aquatic life.

At 0810 hours on July 7, 2011 the inspector made introductions, presented credentials and explained the purpose of this inspection. This MSGP Inspection followed an Inspection of the WWTP's individual permit, NM0020311. The Inspector, Mr. Torrez, and Mr. Mendiola toured the facility. An exit interview to discuss preliminary findings was conducted with Mr. Torrez. At this time, Mr. Torrez explained to the inspector that he has tried to get permit coverage and is awaiting a biological opinion from the US Fish and Wildlife Service regarding proposed invertebrate species that have been added to the endangered species list for Chaves County. Mr. Torrez has had further contact with Ms. Diana McDonald, EPA, regarding this matter. There have been several emails generated back and forth between EPA, Mr. Torrez and the US Fish and Wildlife Service since September 2010. As of this date, no resolution has been made regarding this matter. The inspection ended at 1100 hours on July 7, 2011.

Findings

Section 301 (a) of the Federal Water Pollution Control Act (a.k.a. Clean Water Act) states that "Except as in compliance with this section and sections 302, 306, 307, 318, 402 and 404 of this Act, the discharge of any pollutant by any person shall be unlawful."

Provisions within the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991 temporarily delayed the deadline for Phase I industrial activities (with the exception of power plants, airports, and uncontrolled sanitary landfills) operated by municipalities with populations of less than 100,000 people to obtain an NPDES storm water discharge permit. Congress delayed the permitting deadline for these facilities to allow small municipality's additional time to comply with NPDES requirements. The Phase II Final Rule ended this temporary exemption from permitting. Since March 10, 2003, all ISTEA-exempted municipally operated industrial activities were required to obtain permit coverage. These include treatment works treating domestic sewage, or any other sewage sludge or wastewater treatment device or system used in the storage, treatment, recycling, and reclamation of

municipal or domestic sewage, including land dedicated to the disposal of sewage sludge; that are located within the confines of a facility with a design flow of 1.0 million gallons per day (MGD) or more; or are required to have an approved pretreatment program under 40 CFR Part 403.

Common activities, pollutant sources, and associated pollutants at treatment works include:

- Preparation of chemical, biological and physical treatment processes - Spills and leaks of process chemicals and materials (Disinfectants, polymers and coagulants, alum, ferric chloride, soda ash, lime, sodium aluminate, sodium hypochlorite, caustic soda, chlorine, sodium bisulfite)
- Soil amending and grass fertilizing - Over fertilizing (Commercial brands of balance fertilizers, commercial sludge based products, nitrogen, other nutrients, phosphorous, ammonia, aluminum sulfate, liquid chlorine, liquid polymer, fuel, oil)
- Liquid storage in above ground storage - External corrosion and structural failure, installation problems, spills and overfills due to operator error, failure of piping systems (pipes, pumps, flanges, couplings, hoses, and valves), leaks or spills during pumping of liquids from barges, trucks, or rail cars to a storage facility (Aluminum sulfate, liquid chlorine, bisulfite, liquid polymer, fuel, oil)
- Pest control - Large quantities of pesticide application, pesticide storage (Diazanone, malathion, amdro, dimethylphthalate, diethyl phthalate, dichlorvos, carbaryl, skeetal, batex, liquid copper)
- Sludge drying beds and storage piles - Sludge (Nitrate, TDS, TSS, ammonia, pathogens)
- Sludge transfer - Sludge, vehicles, transfer equipment (Nitrate, TDS, TSS, oil, fuel, hydraulic fluids, ammonia, pathogens)
- Septage transfer - Solid and liquid sanitary waste, vehicles (Nitrate, TDS, TSS, oil, fuel, hydraulic fluids, ammonia, pathogens)
- Equipment/vehicle maintenance and storage - Spills and leaks of lubricants and coolants (solvents, acids, oil, grease, arsenic, lead, cadmium, chromium, chemical oxygen demand (COD), and benzene)
- Miscellaneous - Grit and scum piles from clarifiers, screens, exposed soil (TSS, heavy metals, pathogens, nitrate)

If not properly managed or treated in accordance with an NPDES permit, these activities (many of which do, or may occur at this facility) are a potential threat to water quality through storm water discharges.

A SWPPP should include such things as:

A description of potential pollutant sources - includes such things as a site map, an identification of the types of pollutants that are likely to be present in storm water discharges, an inventory of the types of materials handled at the site that potentially may be exposed to precipitation, a list of significant spills and leaks of toxic or hazardous pollutants, sampling data, a narrative description of the potential pollutant sources from specific activities at the facility, and identification of specific potential pollutants; and

A description of appropriate measures and controls - includes the type and location of existing and proposed non-structural and structural best management practices (BMPs) selected for each of the

areas where industrial materials or activities are exposed to storm water. A SWPPP must contain a narrative evaluation of the appropriateness of storm water management practices that divert, infiltrate, reuse, or otherwise manage storm water runoff so as to reduce the discharge of pollutants. Non-structural and structural BMPs to be described and implemented include such things as minimizing exposure, good housekeeping, preventive maintenance, spill prevention and response procedures, periodic inspections, employee training, record keeping, non-storm water evaluations and certifications, sediment and erosion control, as well as implementation/maintenance of traditional storm water management practices, where appropriate. A combination of preventive and treatment BMPs will yield the most effective storm water management for minimizing the offsite discharge of pollutants via storm water runoff.