



NEW MEXICO  
ENVIRONMENT DEPARTMENT



*Surface Water Quality Bureau*

SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

Harold Runnels Building, N2050  
1190 South St. Francis Drive (87505)  
P.O. Box 5469, Santa Fe, NM 87502-5469  
Phone (505) 827-0187 Fax (505) 827-0160  
[www.nmenv.state.nm.us](http://www.nmenv.state.nm.us)

DAVE MARTIN  
Secretary

BUTCH TONGATE  
Acting Deputy Secretary

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**Certified Mail – Return Receipt Requested**

August 9, 2011

Dr. Jorge Garcia, Utilities Director  
City of Las Cruces  
P.O. Box 20000  
Las Cruces, NM 88004

**Re: Industrial Storm Water, SIC 4952, NPDES Compliance Evaluation Inspection, Jacob Hands WWTP, NMU001751, July 26, 2011**

Dear Dr. Garcia,

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 the cooperation and assistance that your staff provided during my visit to your site. If you have any questions, please feel free to contact me at the above address or by telephone at (505) 222-9587.

Sincerely,  
/s/ Sarah Holcomb  
Sarah Holcomb  
Environmental Scientist/Specialist  
Surface Water Quality Bureau

Cc: Marcia Gail Adams, USEPA (6EN-AS) via e-mail  
Samuel Tate, USEPA (6EN-AS) via e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) via e-mail  
Diana McDonald, USEPA (6EN-WM) via e-mail  
Frank Fiore, NMED District III (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 N 2 5 3 N M U 0 0 1 7 5 1 11 12 1 1 0 7 2 6 17 18 ~ 19 S 20 2 |                            |           |              |           |          |
| Remarks   |                            |           |              |           |          |
| M A J O R W W T P   |                            |           |              |           |          |
| Inspection Work Days  | Facility Evaluation Rating | BI        | QA           | Reserved  |          |
| 67 69   | 70 2                       | 71 N      | 72 N         | 73        | 74 75 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)<br><b>LAS CRUCES WWTP: FROM I-10 HEADED WEST, TAKE THE N. MOTEL BLVD EXIT AND HEAD NORTH. TURN LEFT ON AMADOR AVE., AND PROCEED TO PLANT. ENTRANCE IS ON THE LEFT.</b> | Entry Time /Date<br>1507 HOURS / 7-26-2011                                       | Permit Effective Date<br>9-29-2008  |
|   | Exit Time/Date<br>1630 HOURS / 7-26-2011   | Permit Expiration Date<br>9-29-2013 |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)<br>MR. DOUG PACZYNSKI, SUPERINTENDENT (575) 528-3599<br>MR. JOSHUA ROSENBLATT, REGULATORY ANALYST (575) 528-3704  | Other Facility Data<br>LAT/LONG:<br>N. 32° 17' 33"<br>W. -106° 49' 27"           |                                     |
| Name, Address of Responsible Official/Title/Phone and Fax Number<br>DR. JORGE GARCIA, UTILITIES DIRECTOR (575) 528-3511<br>P.O. BOX 20000, LAS CRUCES, NM 88004   | Contacted<br>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | SIC 4952                            |

**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              |
| M | Records/Reports           | U | Self-Monitoring Program | N | Sludge Handling/Disposal | N | Pollution Prevention |
| S | Facility Site Review      | N | Compliance Schedules    | N | Pretreatment             | N | Multimedia           |
| S | Effluent/Receiving Waters | N | Laboratory              | M | Storm Water              | N | Other:               |

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

1. PLEASE SEE FURTHER EXPLANATIONS FOR FURTHER DETAIL.

|  |   |                  |
|--|---|------------------|
| Name(s) and Signature(s) of Inspector(s)<br>Sarah S. Holcomb /s/ Sarah Holcomb | Agency/Office/Telephone/Fax<br>505-222-9587         | Date<br>8-9-2011 |
| Signature of Management QA Reviewer<br>Richard Powell /s/ Richard Powell       | Agency/Office/Phone and Fax Numbers<br>505-827-2798 | Date<br>8-9-2011 |

**Compliance Evaluation Inspection  
Jacob Hands WWTP, Sector T  
NPDES Permit #NMU001751, July 26, 2011**

**Further Explanations**

**Introductions**

On July 26, 2011, a Compliance Evaluation Inspection was conducted at the Las Cruces WWTP facility (Standard Industrial Classification 4952) located in Las Cruces, New Mexico by Sarah Holcomb (accompanied by Sandra Gabaldón) of the State of New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB). The purpose of this inspection was to document the operator's status regarding the NPDES multi-sector general storm water permit (MSGP) for industrial activities (this facility has industrial activities being conducted on-site that meet the description of industrial activities in Sector T) and stormwater regulations at **40 Code of Federal Regulations (CFR) Part 122.26**.

The Jacob Hands Wastewater Treatment Plant is a 13.5 MGD facility. The plant just underwent an expansion which took it from 8.9 MGD to its current size. The expansion also included the installation of biofilters for odor control. The expansion was finished in June 2009.

Storm water from this facility discharges into the Rio Grande in 20.6.4.101 NMAC of the Lower Rio Grande Basin (*State of New Mexico Standards for Interstate and Intrastate Surface Waters*). Designated uses of the Rio Grande in this section are irrigation, livestock watering, wildlife habitat, marginal warmwater aquatic life, and primary contact.

The inspectors arrived at the facility at 1507 hours. The inspector conducted an entrance interview with Mr. Doug Paczynski, Superintendent, during which the inspectors made introductions, presented their credentials and discussed the purpose of the inspection. Mr. Joshua Rosenblatt, Regulatory Analyst, also joined Mr. Paczynski and the inspectors on a tour of the entire facility and explained processes and management measures already in place. The inspectors conducted an exit interview with Mr. Paczynski and Mr. Rosenblatt at 1615 hours to explain the preliminary findings of the inspection.

This report is based on verbal information reported by the facility representatives, on-site observations made by NMED personnel, and records maintained by NMED and the USEPA.

**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.*

*40 Code of Federal Regulations Part 122.21(a) Duty to apply (1) states: "Any person who discharges or proposes to discharge pollutants...must submit a complete application to the Director in accordance with this section and part 124 of this chapter."*

This facility did not have NPDES permit coverage on the date of this inspection, although a SWPPP had been prepared and the facility was getting ready to submit their NOI for permit coverage. Storm water discharges from this facility can be regulated by either an individual NPDES permit or the Storm Water Multi-Sector General Permit for Industrial Activities (MSGP). This type of facility is covered under Section T – Treatment Works – under SIC 4952.

A Storm Water Pollution Prevention Plan (SWPPP) had been prepared in written form. However, it had not been signed and was not yet being implemented at the time of the inspection.

The inspectors reviewed the draft SWPPP and found that the document was very comprehensive and addressed most of the permit requirements. A few modifications were needed to address information needed on the site map. No assessment of run-on stormwater quality had been conducted, but the facility plans to address that in the future. Obviously, none of the inspections or reports had been done at that point, however, the SWPPP and associated documents appeared to be very orderly. Mr. Rosenblatt informed the inspectors that training for facility staff was occurring the next week. According to a phone conversation the inspector had with Mr. Rosenblatt on August 8, 2011, the SWPPPs had been signed and the NOI for the facility should be sent in some time during the week of August 8.

**Activities at this treatment works facility can result in the creation of various pollutant sources that include, but are not limited to, the following:**

- **Preparation of biological and physical treatment processes:** These activities can be a source of pollutants such as Disinfectants, polymers and coagulants, alum, ferric chloride, sodium aluminate, soda ash, lime, sodium hypochlorite, and caustic soda. These pollutants can come from sources such as spills and leaks of process chemicals.
- **Soil amending and grass fertilizing:** These activities can be a source of pollutants such as commercial brands of balance fertilizers (6-6-6, 8-8-8 or 12-12-12), commercial sludge based products, nitrogen, other nutrients, phosphorus and ammonia. These pollutants can come from sources such as over-fertilizing.
- **Liquid storage in above ground storage:** These activities can be a source of pollutants such as aluminum sulfate, liquid chlorine, liquid polymer, fuel, and oil. These pollutants can come from sources such as 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), and leaks and spills during pumping of liquids from barges, trucks, or rail cars to a storage facility.
- **Pest Control:** These activities can be a source of pollutants such as diazinon, malathion, amdro, dimethylphthalate, diethyl phthalate, dichlorvos, carbaryl, skeetal, batex, and liquid copper. These pollutants can come from sources such as large quantities of pesticide application, pesticide storage.
- **Sludge Drying Beds and Storage Piles:** These activities can be a source of pollutants such as nitrate, TDS (Total Dissolved Solids), TSS (Total Suspended Solids), and ammonia. These pollutants can come from sources such as sludge.
- **Sludge Transfer:** These activities can be a source of pollutants such as nitrate, TDS, TSS, oil, fuel, hydraulic fluids and ammonia. These pollutants can come from sources such as sludge, vehicles and transfer equipment.
- **Incineration:** These activities can be a source of pollutants such as heavy metals, TDS and TSS. These pollutants can come from sources such as ash impoundments/piles.
- **Miscellaneous:** These activities can be a source of pollutants such as TSS, heavy metals, fecal coliform, nitrate and TSS. These pollutants can come from grit and scum piles from clarifiers, screens and exposed soil.

**If not properly managed or treated in accordance with an NPDES permit, activities associated with the activities at this facility could be a potential threat to water quality through storm water discharges.**

#### **Site Inspection Summary**

The MSGP was reissued in 2008.

On the day of the inspection, some pollutant sources observed on site that were exposed outside and could potentially come into contact with storm water included: 1) composting areas and 2) an old equipment “boneyard” located at the western side of the plant.

For additional information on BMPs and SWPPPs for Sector T, please refer to pages 51004-51007 in the document entitled *Final NPDES Storm Water Multi-Sector General Permit for Industrial Activities (Federal Register/Vol. 60, No. 189, Friday, September 29, 1995)*. This document can be downloaded from “Storm Water Archived Publications” at:

[https://cfpub2.epa.gov/npdes/docs.cfm?view=archivedprog&program\\_id=6&sort=date\\_published](https://cfpub2.epa.gov/npdes/docs.cfm?view=archivedprog&program_id=6&sort=date_published). This is an older, discontinued permit (1995 MSGP) but contains helpful background information that was not carried over to either the 2000 or 2008 MSGP.

An exit interview to discuss the preliminary findings of this inspection was conducted at the plant offices with Mr. Paczynski and Mr. Rosenblatt at approximately 1615-1630 hours. The inspector informed the facility representatives of the requirements under the NPDES storm water program regarding permitting requirements, preparation of a SWPPP, and installation of appropriate storm water runoff control practices (per the SWPPP).