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ENVIRONMENT DEPARTMENT

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DAVE MARKLIN  
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Acting Deputy Secretary

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 25, 2011

Mr. Bob Horacek, City Manager  
P.O. Box 879  
Grants, NM 87020

**Re: Industrial Storm Water; SIC 4952; NPDES Compliance Evaluation Inspection; City of  
Grants Waste Water Treatment Plant; NMU001762; August 15, 2011**

Dear Mr. Horacek,

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>.

If you have any questions about this inspection report, please contact me at (505) 827-2575.

Sincerely,

*/s/Daniel Valenta*

Daniel Valenta  
Environmental Scientist/Specialist  
Surface Water Quality Bureau

cc: Marcia Adams, USEPA (6EN-AS) by e-mail  
Samuel Tate, USEPA (6SF) by e-mail  
Carol Peters-Wagon, USEPA (6EN-WM) by e-mail

Diana McDonald, USEPA (6EN-WM) by e-mail  
NMED District I, by e-mail



**City of Grants Waste Water Treatment Plant  
Compliance Evaluation Inspection  
August 15, 2011**

**Further Explanations**

**Introduction**

On August 15, 2011, Daniel Valenta of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the City of Grants, Waste Water Treatment Plant (WWTP) (Standard Industrial Classification 4952, Activity Code TW) in Cibola, 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 TW*) 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 WWTP has a design flow capacity of 1.70 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. The facility is comprised of a lift station, and a series of treatment lagoons. The effluent gravity flows through the treatment system, three aerated treatment lagoons with two final polishing lagoons. The facility discharges after final disinfection with sodium hypochlorite to a series of golf course ponds and does not have an individual NPDES permit. The facility has been in operation for at least 20 years, with the main lift station rebuilt two years ago.

Storm water runoff from this facility may discharge to an unnamed arroyo and thence to the Rio San Jose in segment 20.6.4.98 of the *State of New Mexico Standards for Interstate and Intrastate Surface Waters*, thence to the Rio Puerco, thence to the Rio Grande. Designated uses are livestock watering, marginal warm water aquatic life, primary contact, and wildlife habitat at this time.

At 1358 hours on August 15, 2011, the inspector arrived at the City of Grants WWTP. Mr. Mike Labbe, Facility Operator, was contacted by phone and arrived shortly thereafter. Project manager Mr. Anthony Martinez joined the inspection. The Inspector made introductions, presented credentials and explained the purpose of the inspection. The Inspector, Messrs Martinez and Labbe toured the facility. An exit interview to discuss preliminary findings was conducted with Messrs Martinez and Labbe at the WWTP, the inspection ended at 1504 hours on August 15, 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."*

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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.

1. As of the date of this inspection, this facility does not have coverage under the NPDES Storm Water MSGP for Industrial Activities. Mr. Martinez appeared to have some familiarity with the storm water regulations and the permit program; I was informed a SWPPP was being prepared.
2. The serious of treatment lagoons appeared to have adequate freeboard with no visible sign of overflow apparent. No sludge was present at the facility. A discharge area has been constructed to accept and contain septage waste from commercial operators. This is enclosed by a wall with a water hose to clean the area; this then drains to the facility headworks.
3. Two waste dumpsters were present at the site, no containment was present at these dumpsters to confine rainwater, (see photo 1). The top of one dumpster had no lid and could not be closed to rainwater. Wood chips were used at one time to reduce odors. These have now been piled in the open, exposed to rainwater and alongside what may be a discharge point for the site, (see photo 2).
4. Although this is a fairly clean, well organized site, there appear to be few Best Management Practices (BMPs) implemented, such as containment ponds and trenches, drip pans, perimeter berms, curbing, run on diversion structures, regular training, inspections, or other practices to prevent or reduce rain water from coming in contact with pollutions or leaving the site.

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)

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- 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)

A SWPPP should include such things as:

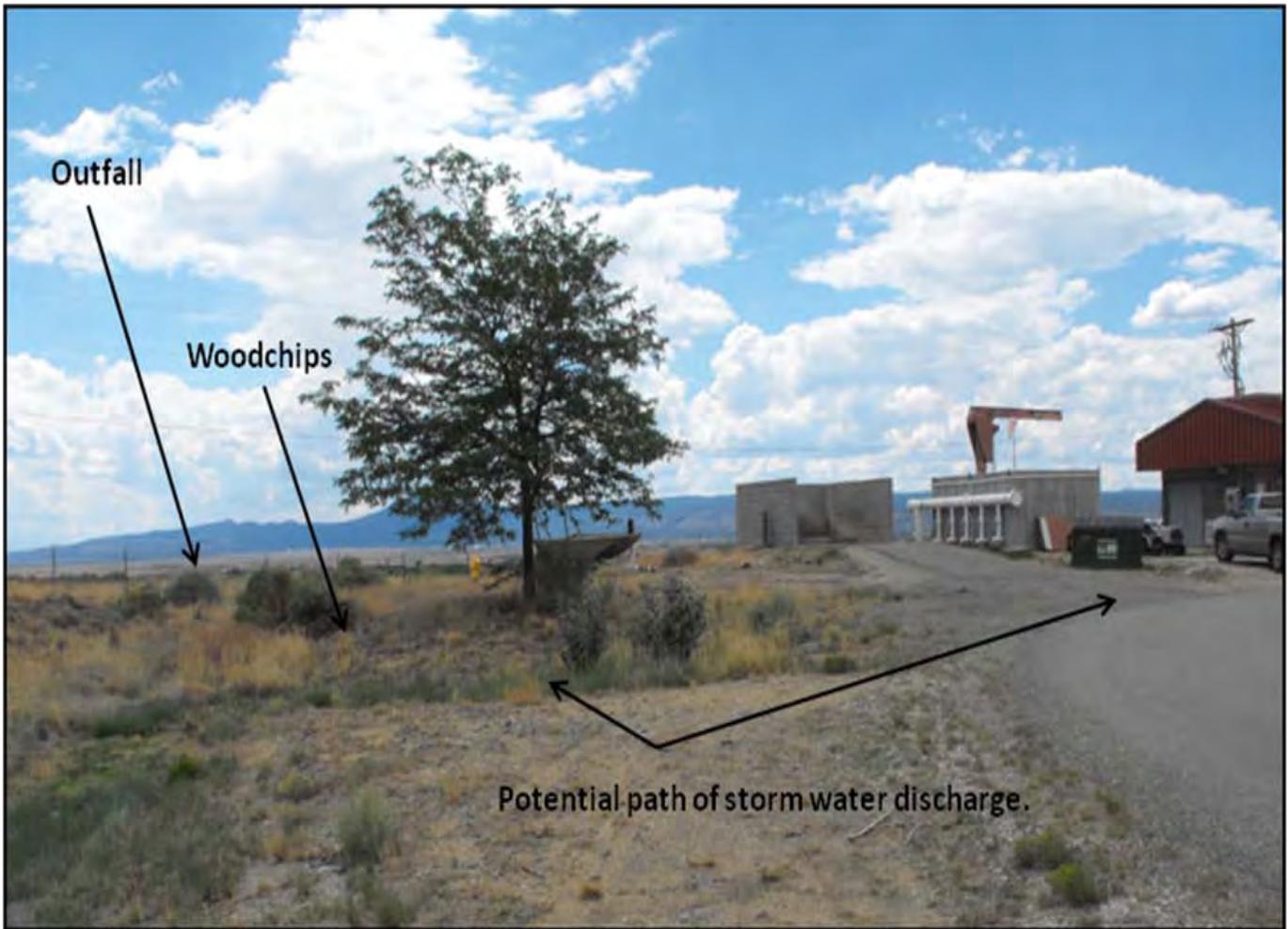
**A description of potential pollutant sources** - includes such things as a site map, an identification of the types of pollutants that are likely to be present in storm water discharges, an inventory of the types of materials handled at the site that potentially may be exposed to precipitation, a list 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.

**NMED/SWQB  
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: August 15, 2011	Time: 1426 hours
City/County: Grants, NM/Cibola County		
Location: Grants WWTP, end of George Hanosh Blvd, photo taken facing southwest.		
Subject: Apparent path rainwater may take and pollutant sources encountered at this corner of the facility.		



**NMED/SWQB  
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: August 15, 2011	Time: 1430 hours
City/County: Grants, NM/Cibola County		
Location: Grants WWTP, end of George Hanosh Blvd, photo taken facing southwest.		
Subject: Potential pollutants exposed to rainwater.		

