



**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Surface Water Quality Bureau

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RYAN FLYNN
Cabinet Secretary-Designate

BUTCH TONGATE
Deputy Secretary

THOMAS SKIBITSKI
Acting Director
Resource Protection Division

Certified Mail - Return Receipt Requested

May 14, 2013

Mr. John Milloy
Vallecitos MDWCA
P.O. Box 1251
Vallecitos, New Mexico 7581

Re: Minor Non-Municipal; SIC 4941; NPDES Compliance Evaluation Inspection; Vallecitos MDWCA; Permit NMU001854; May 2, 2013

Dear Mr. Milloy:

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 Findings section of the 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, Region VI
Enforcement Branch (6EN-WM)
Allied Bank Tower
1445 Ross Avenue
Dallas, Texas 75202-2733

Bruce Yurdin
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact me at (505) 827-2575 or daniel.valenta@state.nm.us.

Sincerely,

/s/Daniel Valenta

Daniel Valenta
Environmental Scientist/Specialist
Surface Water Quality Bureau

Cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail
Samuel Tate, USEPA (6EN-AS) by e-mail
Carol Peters, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Larry Giglio, USEPA (6WQ-PP) by e-mail
Hannah Branning, USEPA (6EN-WC) by e-mail
Jan Walker, USEPA (6EN) by e-mail
NMED District II, Robert Italiano 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 8 5 4 11 12 1 3 0 5 0 2 17 18 C 19 S 20 2					
Remarks					
D R I N K I N G W A T E R F A C I L I T Y					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 1	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) Vallecitos MDWCA/ P.O. Box 1251/ Vallecitos, NM 87581 Rio Arriba County	Entry Time /Date 1534/ 5-2-2013	Permit Effective Date No Permit
	Exit Time/Date 1644/5-2-2013	Permit Expiration Date No Permit
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. Bob Dunsmore/Operator/575-582-4224	Other Facility Data LAT 36° 29' 42.37" N LONG 106° 06' 45.20" W SIC 4941	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. John Malloy, P.O. Box 1251, Vallecitos, NM 87581/Vallecitos MDWCA President/ 505-575-582-	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

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

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

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

1. Facility does not have permit coverage for the discharge of chlorinated waste from back flushing filters.

Name(s) and Signature(s) of Inspector(s) DANIEL VALENTA /s/Daniel Valenta	Agency/Office/Telephone/Fax NMED/SWQB 505-827-2575	Date 5/14/2013
Signature of Management QA Reviewer BRUCE YURDIN /s/Bruce Yurdin	Agency/Office/Phone and Fax Numbers NMED/SWQB 505-827-0418	Date 5/14/2013

**Compliance Evaluation Inspection
Vallecitos MDWCA
NMU001854
May 2, 2013**

Introduction

On May 2, 2013 a Compliance Evaluation Inspection was conducted at the Vallecitos MDWCA (Standard Industrial Classification 4941) by Daniel Valenta of the NMED. The purpose of this inspection was to document the facility's status regarding the process wastewater from the Water Treatment Plant. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative findings section of the report.

Vallecitos is a small village in the Carson National Forest of 96 people. It is beside the Vallecitos River where it draws its raw water through an infiltration gallery alongside the river. The village has 29 active connections to the water system. Located in the infiltration gallery is a pump that powers the system. When the storage tank, located above the village, gets low the pump is triggered on. The pump pushes water from the gallery through the three filter tanks and up to the storage tank. Injected into the water stream is household Great Value Bleach for disinfection.

When the filters need back flushing a one way valve is opened manually allowing the chlorinated water from the storage tank to back flow through the filters and out a discharge pipe to the river. The volume of discharge is not measured and the amount of chlorinated water used in the process depends on the length of time the manual valve is left open. No records of backflow events were available for review. The operators are unpaid volunteers who live in the village.

The water discharges from the facility into the Rio Vallecitos in Segment 20.6.4.115 of the Rio Grande Basin. This segment has a Total Maximum Daily Load (TMDL) for chronic aluminum, temperature, and turbidity. Segment 20.6.4.115 designated uses are: domestic water supply, irrigation, high quality coldwater aquatic life, livestock watering, wildlife habitat, primary contact, public water supply on the Rio Vallecitos and El Rito creek.

This report is based on on-site observation by NMED personnel and verbal information provided by the facility's representative. Arriving at the site at approximately 1020 hours, the inspector made introductions, presented his credentials and discussed the purpose of the inspection with Mr. Russell Casados. A brief exit interview to discuss the findings of this inspection was conducted at the facility at 1427 hours.

Federal Clean Water Act and NPDES Requirements

Section 301 of the Federal Clean Water Act states: *“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 CFR Part 122.1 (b) Scope of the NPDES permit requirement states (1) states, *“The NPDES program requires permits for the discharge of ‘pollutants’ from any ‘point source’ into ‘waters of the United States.’ The terms ‘pollutant’, ‘point source’ and ‘waters of the United States’ are defined at § 122.2.”*

Compliance Evaluation Inspection
Vallecitos MDWCA
NMU001854
May 2, 2013

Per 40 CFR Part 122.21(a) Duty to apply states (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.”*

Findings

The Vallecitos MDWCA does not have NPDES permit coverage for the discharge of chlorinated wastewater into the Rio Vallecitos.

At the present time the Vallecitos MDWCA is working with an engineering consultant firm and the New Mexico Construction Program Bureau to build a new system for the village. The discharge from the present system appears to require permit coverage. The USEPA Region 6 NPDES Permit Coordinator can be contacted for more information on how to submit an application for discharges of pollutants under the federal Clean Water Act.

**NMED/SWQB
Official Photograph Log**

Photo # 1

Photographer: Daniel Valenta	Date: 5/2/2013	Time: 1547
City/County: Vallecitos/Rio Arabia		
Location: Village of Vallecitos Water Treatment Facility facing south.		
Subject: Vallecitos MDWCA filter/equipment house next to the river.		



**NMED/SWQB
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 5/2/2013	Time: 1542
City/County: Vallecitos/Rio Arabia		
Location: Village of Vallecitos Water Treatment Facility facing east.		
Subject: Discharge outfall of chlorinated back flush water from the Vallecitos MDWCA.		



**NMED/SWQB
Official Photograph Log**

Photo # 3

Photographer: Daniel Valenta	Date: 5/2/2013	Time: 1544
City/County: Vallecitos/Rio Arabia		
Location: Village of Vallecitos Water Treatment Facility facing north.		
Subject: Pump house over the infiltration galleria next to the Rio Vallecitos.		

