**NEW MEXICO**
**ENVIRONMENT DEPARTMENT**

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***Jennifer J. Pruett***
Deputy Secretary

**Certified Mail - Return Receipt Requested**

October 7, 2019

Mr. Jerah Cordova, Mayor
City of Belen
100 S. Main Street
Belen, New Mexico 87002

**Re: City of Belen Wastewater Treatment Plant, Major, Individual Permit; SIC 4952; NPDES Compliance Evaluation Inspection; NPDES Permit No. NM0020150; Inspection Date: September 11, 2019**

Dear Mr. Cordova:

Enclosed please find a copy of the report and check list 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.

Further explanations and problems noted during this inspection are discussed on the completed form and checklist of this inspection report. 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 advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

David Long, Enforcement Coordinator
Environmental Protection Agency, Region 6 NPDES
Enforcement Branch (6EN-WM)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Sarah Holcomb, Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

David Long (Long.David@epa.gov) is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Sandra Gabaldón at 505-827-1041 or at Sandra.gabaldon@state.nm.us.

Sincerely,
*/s/ Sarah Holcomb*

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Brent Larsen and Tung Nguyen, USEPA (6WQ-PP) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail
John Rhoderick, NMED District I by e-mail

Mr. Jeffrey Gatewood by e-mail
Mr. Reyes Moreno by e-mail

SH/sg

EPA

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

# NPDES Compliance Inspection Report

## Section A: National Data System Coding

| 1 | 2 | 3 | NPDES | yr/mo/day | 18 | 19 | 20 | Fac Type |
|---|---|---|---|---|---|---|---|---|
| Transaction Code | | | | | Inspec. Type | Inspector | | |
| N | 5 | N | NM0002015 0 | 091119 | C | S | | 1 |

| 67 | 69 | 70 | 71 | 72 | 73 | 74 | 75 | 80 |
|---|---|---|---|---|---|---|---|---|
| Inspection Work Days | | Facility Evaluation Rating | BI | QA | Reserved | | | |
| 1 | | 2 | N | N | | | | |

MAJOR WWTP

## Section B: Facility Data

| Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)* | Entry Time /Date | Permit Effective Date |
|---|---|---|
| BELEN WWTP – 1-25 South, Exit 195. Travel approximately 5 miles and then turn east (left) on Vivian Road. South on Conservancy Road to WWTP. | 1022 Hours / September 11, 2019 | March 1, 2015 |
| | Exit Time/Date | Permit Expiration Date |
| | 1250 Hours / September 11, 2019 | February 29, 2020 |

| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) | Other Facility Data |
|---|---|
| Jeffery Gatewood, Operator IV / (505) 966-2581 / jeffry.gatewood@belen-nm.gov<br>Reyes Moreno, Operator III, (505) 966-2581 / reyes.moreno@belen-nm.gov | SIC 4952<br><br>N 34°37.527<br>W -106°46.614 |

| Name, Address of Responsible Official/Title/Phone and Fax Number | Contacted |
|---|---|
| Jerah Cordova, Mayor / (505) 966-2580 / jerah.cordova@belen-nm.gov<br>100 S. Main Street<br>Belen, New Mexico 87002 | Yes ☐ No * |

## Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

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

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

**Please see checklist and further explanations for details of findings**

| Name(s) and Signature(s) of Inspector(s) | Agency/Office/Telephone/Fax | Date |
|---|---|---|
| Sandra Gabaldon /s/ Sandra Gabaldon | NMED/SWQB/(505) 827-1041/(505) 827-0160 | October 7, 2019 |
| | | |
| **Signature of Management QA Reviewer**<br>***/s/ Kevin Pierard***<br>**Kevin Pierard, Municipal Team Lead** | **Agency/Office/Phone and Fax Numbers**<br>**NMED/SWQB/(505) 827-2795(505) 827-0160** | **Date**<br>**October 7, 2019** |

| City of Belen Wastewater Treatment Plant | PERMIT NO. NM0020150 |
|---|---|

SECTION A – PERMIT VERIFICATION

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

DETAILS: Please see further details.

| | |
|---|---|
| 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 (NO )*)
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 |

| City of Belen Wastewater Treatment Plant | PERMIT NO. NM0020150 |
|---|---|

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 NO )*
DETAILS:

| | |
|---|---|
| 1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.<br>TYPE OF DEVICE:36" Weir | ☒ Y ☐ N ☐ NA |
| 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. | ☒ 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 YES )*
DETAILS:

| | |
|---|---|
| 1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)* | ☒ Y ☐ N ☐ NA |

| CITY OF BELEN WASTEWATER TREATMENT PLANT | PERMIT NO. NM0020150 |
|---|---|

**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. 100 % OF THE TIME. ☒ Y ☐ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. 0 % OF THE TIME. ☐ Y ☒ N ☐ NA

7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NA

LAB NAME Hall Environmental Analysis Laboratory BioAquatic Testing

LAB ADDRESS 4901 Hawkins St., NE; Albuquerque, NM 87109 2501 Mayes Road #100; Carrollton, TX 87006

PARAMETERS PERFORMED BOD, TSS, E. coli; Sludge Biomonitoring

**SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS.** ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED NO ).*

| OUTFALL NO. | OIL SHEEN | GREASE | TURBIDITY | VISIBLE FOAM | FLOAT SOL. | COLOR | OTHER |
|---|---|---|---|---|---|---|---|
| 001 | NONE | NONE | NONE | NONE | NONE | Slight Turbidity | |
| | | | | | | | |
| | | | | | | | |

RECEIVING WATER OBSERVATIONS Receiving channel was stagnant except at the discharge point. Slight turbidity noted.

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: agricultural (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

**Compliance Evaluation Inspection**
**City of Belen Wastewater Treatment Plant (WWTP)**
**NPDES Permit No. NM0020150**
**Date of Inspection: September 11, 2019**

**Introduction:**

On September 11, 2019, Sandra Gabaldón accompanied by Daniel Valenta, of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Belen Wastewater Treatment Plant (WWTP), Valencia County, State of New Mexico. The Belen WWTP has a design flow capacity of 1.2 MGD (million gallons per day) and is classified as a major municipal discharger under the federal Clean Water Act (CWA), Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. The City of Belen is assigned NPDES Permit No. NM0020150. This permit regulates the WWTP point source discharge to the Bosque Drain, thence to the Rio Grande in he Rio Grande Basin in segment 20.6.4.105 NMAC of *the State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4. NMAC.* This segment includes the designated uses of irrigation, marginal warmwater aquatic life, livestock watering, public water supply, wildlife habitat and primary contact.

**Inspection Details**:

The NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspectors, and records and reports kept by the permittee, NMED and/or USEPA.

Upon arrival at approximately 1022 hours, Ms. Gabaldon met with Mr. Jeffrey Gatewood, Chief Operator (Certified Level IV). During the entrance interview, Ms. Gabaldón presented her federal credentials, made introductions and explained the purpose of the inspection. A tour of the facility commenced thereafter. Upon completion of the tour, the inspector reviewed the facility's laboratory and requested records from June 2019. An exit interview to discuss preliminary findings of the inspection was conducted at approximately 1250 hours on September 11, 2019, at the facility with Mr. Gatewood, Mr. Reyes Moreno (Certified Operator III/Laboratory technician) and Mr. Benjamin Morales (uncertified/laboratory technician).

**Facility Description**:

The City of Belen WWTP is located at 1300 Conservancy Road, Belen, in Valencia County, New Mexico. The facility is a non-pretreatment (< 5 MGD) facility, classified as a major municipal discharger, permitted for 1.2 MGD design flow, with an actual average flow maintained around 0.4 MGD.

The Belen WWTP is an activated sludge facility. The main plant lift station consists of a wet well and four submersible pumps rated for 880 gpm (gallons per minute) each. Entrance works (headworks) include a barscreen and Parshall Flume. All flow from the entrance works goes to the grit tank, where high specific gravity solids are dropped out of the classifier and dewatered. These solids (grit) are disposed of in the landfill. **The facility does not perform the paint filter test (40 CFR 258) as required**

**prior to grit disposal.** The wastewater flow from the grit chamber goes to the two aeration basins. The flow is split evenly between the two aeration basins. Flow from the aeration basins is then split between two secondary clarifiers. From the clarifiers, all wastewater flow goes through the chlorine contact chamber, where chlorine contact time is approximately 30-40 minutes. Sulfur dioxide provides de-chlorination. Water is then discharged over a 36" rectangular weir into the Bosque Drain.

**Sludge**:

Sludge is drawn from the bottom of the secondary clarifiers and pumped to the sludge thickener unit. The sludge is decanted in this unit prior to being pumped to the aerobic digesters. Supernatant from the sludge thickener is piped back to the influent wet well and reintroduced to the aeration basins. After digestion, sludge is taken to the sludge drying beds. Drainage from the beds is routed back to the wet well at the plant lift station. After drying to approximately 50 percent total solids, the sludge is removed to the sludge composting pad for composting. The sludge is composted after drying without the use of amendment materials. After composting, the sludge is used as a soil conditioner for Rasband Farms.

**Compliance Evaluation Inspection**
**City of Belen Wastewater Treatment Plant (WWTP)**
**NPDES Permit No. NM0020150**
**Date of Inspection: September 11, 2019**

**Further Explanations:**

**Section A – Permit Verification – Overall Rating "Unsatisfactory"**

According to **40 CFR 122.21(d):**

**(d)** *Duty to reapply.*

*Any POTW with a currently effective permit shall submit a new application at least 180 days before the expiration date of the existing permit, unless permission for a later date has been granted by the Director. (The Director shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)*

**In Part III, 4. Duty to Reapply**:

*If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The application shall be submitted at least 180 days in advance but no later than the permit expiration date. Continuation of expiring permits shall be governed by regulations promulgated at 40 CFR 122.6 and any subsequent amendments.*

**Findings** for Permit Verification:

The permitee has not submitted their Application for Renewal to EPA. Their permit expires on February 29, 2020. The application should have been submitted by September 2019. According to the Mr. Gatewood, they are still in the process of completing the application process.

**Section B – Recordkeeping and Reporting Evaluation – Overall Rating of "Unsatisfactory"**

**In Part I, A. Limitations and Monitoring Requirements:**

| EFFLUENT CHARACTERISTICS | DISCHARGE LIMITATIONS lbs/day, unless noted I mg/1, unless noted | | | | | MONITORING REQUIREMENTS | |
|---|---|---|---|---|---|---|---|
| POLLUTANT | 30-DAY AVG | 7-DAY AVG | 30-DAY AVG | 7-DAY AVG | DAILY MAX | MEASUREMENT FREQUENCY | SAMPLE TYPE |
| Flow | ReportMGD | Report MGD | *** | *** | *** | Continuous | Totalizing Meter |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| Biochemical Oxygen Demand, 5-day | 300 | 450 | 30 | 45 | *NIA* | 3/Week | 6-Hr Cpmposite |
| BOD% Removal (*I) | 85% (* 1) | *NIA* | *NIA* | *NIA* | *NIA* | *NIA* | *NIA* |
| TSS% Removal | 85% (*I) | *NIA* | *NIA* | *NIA* | *NIA* | *NIA* | *NIA* |
| Total Suspended Solids | 300 | 450 | 30 | 45 | *NIA* | 3/Week | 6-Hr Composite |
| **E. Coli Bacteria (*2)** | **5.73X $10^9$(*3)** | **Report (*2)** | **126** | ***NIA*** | **410** | **3/Week** | **Grab** |
| **Total Residual Chlorine** | **N/A** | **N/A** | **N/A** | ***N/A*** | **19 ug/l (*2)** | **Daily** | **Grab (*4)** |

Footnotes:

*2 Colony forming units (cfu) per 100 ml.

*4 Instantaneous Grab. Regulations at 40 CFR Part 136 define "instantaneous grab" as analyzed within 15 minutes of collection. The effluent limitation for TRC is the instantaneous maximum and cannot be averaged for reporting purposes. TRC limitations will apply when chlorine is used in the treatment process, either alone, or in combination wi1:h ultraviolet light treatment.

*

**Findings** for Recordkeeping and Reporting:

The permittee showed the inspectors how they are analyzing TRC for compliance reporting purposes. The meter being used shows the results in mg/L. The permittee is required to report in ug/L. **They are not converting their results into ug/L**. For instance, the permittee's results when they performed the TRC in front of the inspectors was .15 mg/L which is 150 ug/L.

The permittee is required to report their E. coli results in geometric mean. The geomean is calculated by taking the logarithm for each sample result, calculating the arithmetic average of the logarithm and then after you get your arithmetic average of the logarithm, you take the antilog of the arithmetic average of the logarithms. This will give the geomean. The permittee is only reporting the logarithm, and not completing the calculation. For example, the permittee provided the following information for one week in June 2019:

| Colonies per 100 mL (sample results) | Log of Colonies per 100 mL |
|---|---|
| 4 | 0.6020 |
| 2 | 0.3010 |
| 7 | 0.8450 |
| | |
| Arithmetic Average: | 1.748 / 3 = .58276 |
| **Geometric Mean:** | **Antilog of .58276 = 3.826** |

The permittee used 1.748 in their calculation rather than the geometric mean of 3.826. **The reported results on their DMR are incorrect.**

**Section D – Self-Monitoring – Overall Rating of "Marginal"**

**40 CFR 122.41(4)(ii) states:**

> *If the permittee monitors any pollutant more frequently than required by the permit using test procedures approved under 40 CFR Part 136, or another method required for an industry-specific waste stream under 40 CFR subchapters N or O, the results of such*

*monitoring shall be included in the calculation and report of the data submitted in the DMR or sludge reporting form specified by the Director.*

**In Part III, D(5) of the Permit states: Additional Monitoring By the Permittee states:**

*If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR Part 136 or as specified in this permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the Discharge Monitoring Report (DMR). Such increased monitoring frequency shall also be indicated on the DMR. Monitoring must be conducted according to test procedures approved under 40 CFR 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.*

**Findings** for Self-Monitoring:

The permittee sends BOD, TSS and E. coli samples to Hall Environmental for analyses as well as performing their own analyses of BOD, TSS and E. coli. The permittee is not including these results in their calculations that are reported on their NetDMR. They are not increasing the "frequency" number on their NetDMR. For instance, the permittee stated they ran their BOD "three per week" instead of indicating they have four samples for the month of June 2019.

**Section F – Laboratory – Overall Rating of "Marginal"**

**40 CFR 136.7 Quality assurance and quality control states:**

The permittee/laboratory shall use suitable QA/QC procedures when conducting compliance analyses with any part 136 chemical method or an alternative method specified by the permitting authority. These QA/QC procedures are generally included in the analytical method or may be part of the methods compendium for approved Part 136 methods from a consensus organization. For example, Standard Methods contains QA/QC procedures in the Part 1000 section of the Standard Methods Compendium. The permittee/laboratory shall follow these QA/QC procedures, as described in the method or methods compendium.

**Standard Methods Quality Control states**:

Include in each analytical method or SOP the minimum required QC for each analysis. A good quality control program consists of at least the following elements, as applicable: initial demonstration of capability, ongoing demonstration of capability, method detection level determination, reagent blank (also referred to as method blank), laboratory-fortified blank (also referred to as blank-spike), laboratory fortified matrix (also referred to as matric spike), laboratory-fortified matrix duplicate (also referred to as matrix spike duplicate) or duplicate sample, internal standard, surrogate standard (for organic analysis) or tracer (for radiochemistry), calibration control charts, and corrective action, frequency of QC indicators, QC acceptance criteria, and definitions of a batch.

**Part III.C.5(c) Monitoring Procedures of the Permit**:

c. An adequate analytical quality control program, including the analyses of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.

**Findings** for Laboratory:

The permittee's SOP (standard operating procedures) does not provide any information regarding quality control procedures as listed above.

**Section H – Sludge Disposal – Overall Rating of "Marginal"**

**40 CFR 503.17.3.(i)(B)**:

> *"I certify, under penalty of law, that the information that will be used to determine compliance with Class A pathogen requirements in §503.32(a) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there is significant penalties for false certification including the possibility of fine and imprisonment."*

**Findings** for Sludge Disposal:

The permittee does not provide the certification statement required.