NEW MEXICO
ENVIRONMENT DEPARTMENT

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SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

RYAN FLYNN
Cabinet Secretary

BUTCH TONGATE
Deputy Secretary

Certified Mail - Return Receipt Requested

May 7, 2014

Mr. Arthur M. Torrez
Water/Wastewater Manager
2306 East College Avenue
Post Office Drawer 1838
Roswell, NM 88202-1838

Re: Roswell Wastewater Treatment Plant; Major; Individual Permit; SIC 4952; Compliance Evaluation Inspection; NPDES Permit NM0020311; April 30, 2014

Dear Mr. Torrez:

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.

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 USEPA and NMED regarding modifications and compliance schedules at the addresses below:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Fountain Place
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 Sandra Gabaldon at (505) 827-1041 or at sandra.gabaldon@state.nm.us.

Sincerely,

/s/ Bruce J. Yurdin

Bruce J. Yurdin
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson (6EN-WC) by e-mail
NMED District III, by e-mail

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	11	12	17	18	19	20
Transaction Code		NPDES		yr/mo/day		Inspec. Type	Inspector	Fac Type
N	5	NM0020311		140430		C	S	

Remarks: MAJOR WWTP

67	69	70	71	72	73	74	75	80
Inspection Work Days		Facility Evaluation Rating	BI	QA			Reserved	
		4	N	N				

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 WASTEWATER TREATMENT PLANT -
Taike 285 south to Roswell, go East on College Avenue to end of street. WWTP at the end of road.

CHAVES COUNTY

Entry Time /Date
1115 hours / 04-30-2014

Permit Effective Date
11-01-2013

Exit Time/Date
1420 hours / 04-30-2014

Permit Expiration Date
10-31-2018

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Daniel Mendiola, Superintendent, (575) 522-1449 / (575) 524-2727

Other Facility Data

Name, Address of Responsible Official/Title/Phone and Fax Number
Arthur M. Torrez, Water/Wastewater Manager / (575) 522-1449
2305 East College Avenue
Post Office Drawer 1838
Roswell, NM 88202-1838

Contacted
Yes * No

SIC 4952

Section C: Areas Evaluated During Inspection

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

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

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

1. **The permittee has a design capacity of 7 MGD (million gallons per day); however, this facility utilizes the majority of their effluent for agricultural / parks / golf courses throughout the Roswell area. The facility sells effluent at $0.05/gallon. This is done approximately 10 months out of the year. The facility has a groundwater discharge permit and adheres to the limitations set forth in the permit.**

2. **For further information, please see attached checklist and further explanations.**

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
/s/ Sandra Gabaldón Sandra Gabaldon, Environmental Scientist/Specialist	NMED/Surface Water Quality Bureau/827-1041	05/07/2014
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
/s/ Michelle Lemon Michelle Lemon, Municipal Team Leader	NMED/Surface Water Quality Bureau/827-2819	05/07/2014

ROSWELL WASTEWATER TREATMENT PLANT	PERMIT NO. NM0020311

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS X S ¨ M ¨ U ¨ NA (*FURTHER EXPLANATION ATTACHED NO*)

DETAILS: **Outfall 002 (Berrendo Creek) has not been used in a number of years. This outfall continues to be permitted in the event of any emergency situation.**

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	X Y ¨ N ¨ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	O Y ¨ N X NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	X Y ¨ N ¨ NA
4. ALL DISCHARGES ARE PERMITTED	X Y ¨ N ¨ NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. X S ¨ M ¨ U ¨ NA (*FURTHER EXPLANATION ATTACHED NO*)
DETAILS:

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	X Y ¨ N ¨ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	X S ¨ M ¨ U ¨ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	X Y ¨ N ¨ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	X Y ¨ N ¨ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	X Y ¨ N ¨ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	X Y ¨ N ¨ NA
e) DATES AND TIMES OF ANALYSES.	X Y ¨ N ¨ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	X Y ¨ N ¨ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	X S ¨ M ¨ U ¨ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	X S ¨ M ¨ U ¨ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	X Y ¨ N ¨ NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. X S ¨ M ¨ U ¨ NA *(FURTHER EXPLANATION ATTACHED NO)*
DETAILS:
This facility is an extended activated sludge system which has a design capacity that is greater than their influent. Therefore, they have the ability to alternate treatment basins and are not treating to their capacity level as yet.

1. TREATMENT UNITS PROPERLY OPERATED.	X S ¨ M O U ¨ NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	X S ¨ M O U ¨ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .	X S ¨ M O U ¨ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	X S ¨ M O U ¨ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE	X S ¨ M O U ¨ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	X S ¨ M O U ¨ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	X S ¨ M ¨ U ¨ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	X Y ¨ N ¨ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	X Y O N ¨ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	X Y ¨ N ¨ NA

ROSWELL WASTEWATER TREATMENT PLANT	PERMIT NO. NM0020311

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	X Y O N ¨ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	X Y ¨ N O NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	X Y O N ¨ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	¨ Y X N ¨ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	¨ Y ¨ N X NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. X S ¨ M ¨ U ¨ NA *(FURTHER EXPLANATION ATTACHED NO).*
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	X Y ¨ N ¨ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	X Y ¨ N ¨ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	X Y ¨ N ¨ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	X Y ¨ N ¨ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	X Y ¨ N ¨ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	X Y ¨ N ¨ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	X Y ¨ N ¨ NA
b) PROPER PRESERVATION TECHNIQUES USED.	X Y ¨ N ¨ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	X 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?	O Y ¨ N X NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. O S X M ¨ U ¨ NA *(FURTHER EXPLANATION ATTACHED NO)*
DETAILS**: Permittee discharges approximately two months out of the year (December – January).**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE 24-inch Parshall Flume	X Y ¨ N ¨ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. **When discharging occurs**.	X Y ¨ N ¨ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	X Y ¨ N ¨ NA
4. CALIBRATION FREQUENCY ADEQUATE.	¨ Y X N ¨ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	¨ Y X N ¨ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. **Calibration checks are not documented**.	O Y X N ¨ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. **No Discharge occurring at this time**.	O Y ¨ N X NA
6. HEAD MEASURED AT PROPER LOCATION. **No discharge occurring at this time**.	O Y ¨ N X NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	X Y ¨ N ¨ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. X S ¨ M ¨ U ¨ NA *(FURTHER EXPLANATION ATTACHED NO)*
DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	X Y ¨ N ¨ NA

ROSWELL WASTEWATER TREATMENT PLANT	PERMIT NO. NM0020311

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED — X Y ¨ N O NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. — X S O M ¨ U ¨ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. — X S ¨ M ¨ U ¨ NA

5. DUPLICATE SAMPLES ARE ANALYZED. 100 % OF THE TIME. — X Y ¨ N ¨ NA

6. SPIKED SAMPLES ARE ANALYZED. ___ % OF THE TIME. — ¨ Y ¨ N X NA

7. COMMERCIAL LABORATORY USED. — X Y ¨ N ¨ NA

LAB NAME Wilkens Environmental Consulting and Laboratories

LAB ADDRESS 832 NW 67 Street; Oklahoma City, Oklahoma 73116

PARAMETERS PERFORMED Biomonitoring

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

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001							

RECEIVING WATER OBSERVATIONS NO DISCHARGE

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. — X S ¨ M ¨ U ¨ NA *(FURTHER EXPLANATION ATTACHED NO).*
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. — X S ¨ M ¨ U ¨ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. — X 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 X 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
Roswell Wastewater Treatment Plant
NPDES Permit No. NM0020311
April 30, 2014

Introduction

A Compliance Evaluation Inspection (CEI) was conducted at the Roswell Wastewater Treatment Plant (WWTP), located in Roswell, New Mexico on April 30, 2014 by Ms. Sandra Gabaldón, accompanied by Mr. Daniel Valenta, of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). This facility is classified as a major discharger under the federal Clean Water Act (CWA), Section 402. This facility is regulated under the National Pollutant Discharge Elimination System (NPDES) permit program, and is assigned NPDES permit number NM0020311. The facility design flow is 7 million gallons per day (MGD).

The Roswell Wastewater Treatment Plant has two permitted outfalls: Outfall 001 discharges into the Rio Hondo River; and Outfall 002 discharges into Berrendo Creek in the Pecos River Basin. The designated uses of Segment 20.6.4.206 NMAC include: Irrigation, livestock watering, wildlife habitat, secondary contact and warmwater aquatic life.

The inspectors arrived at the WWTP at 1115 hours and conducted an entrance interview with Mr. Daniel Mendiola, Level IV Operator. The inspector made introductions, presented her credentials, and discussed the purpose of the inspection with Mr. Mendiola. An exit interview to discuss preliminary findings of the inspection was conducted with Mr. Mendiola and Mr. Arthur Torrez, Water and Wastewater Manager, on site.

The NMED performs a specific number of CEI's annually for the United States Environmental Protection Agency (USEPA). The purpose of this inspection is to provide the USEPA with information to evaluate the permittee's compliance with their NPDES permit. The enclosed inspection report is based on verbal information supplied by the permittee's representatives, observations made by the NMED inspector, and a review of records maintained by the permittee, commercial laboratories, and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative Further Explanations section of the report.

Treatment Scheme

There are a total of three lift stations that bring influent from the City of Roswell into the WWTP. Influent enters the plant through a pump station where it goes through a bar screen and a grit chamber. It then enters one of two primary clarifiers, into a splitter box and then flows into aeration basins with fine bubble diffusers. It then flows into the final clarifiers. Disinfection is accomplished with Ultraviolet light. A total of two banks, 96 bulbs are used. Weekly maintenance is performed on the UV system to ensure its proper disinfection of the effluent. There are remnants of the old trickling filter onsite along with the previous chlorine contact chamber, which is no longer used.

Sludge

All sludge generated is composted using the static windrow method. Sludge in the drying bed is allowed to dry to a minimum of 50% solid before windrowing. Temperatures are monitored within the windrows. Regular turning of windrows is performed with a minimum of five turnings to meet the requirements. Fecal coliform densities are also taken to ensure compliance, along with vector attraction reduction requirements. Class A sludge is produced at this facility.

Official Photograph Log
Photo # 1

Photographer: Daniel Valenta	Date: April 30, 2014	Time: 1200 hours
City/County: Roswell / Chaves		State: New Mexico
Location: Roswell WWTP		
Subject: Overview of facility		

Compliance Evaluation Inspection
Roswell Wastewater Treatment Plant
NPDES Permit No. NM0020311
April 30, 2014

Further Explanations

Note: The sections are arranged according to the format of the enclosed EPA inspection checklist (Form 3560-3), rather than being ranked in order of importance.

Section E – Flow Measurement – Overall Rating of "Marginal"

Permit Requirements for Flow Measurement:

The Permit in Part III, Section C.6 states:

> *Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy of reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to insure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from the true discharge rates throughout the range of expected discharge volumes.*

Findings for Flow Measurement*:*

The permittee is not documenting calibration checks. The permittee has not done a calibration of the instrumentation. Permittee should check the calibration between the primary and secondary flow devices to ensure it is within the maximum deviation of less than 10%.