Via Electronic-Mail

November 18, 2022

The Honorable Boe Lopez, Mayor
P.O. Box 488
Springer, New Mexico 87747
diamondarrowranch@yahoo.com

Re: NPDES Compliance Evaluation Inspection; Town of Springer Water Treatment Plant; NPDES Tracking No. NM0030627; October 20, 2022

Dear Mayor Chavez:

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.

Introduction, treatment scheme, and 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:

Rachel Matthews
NPDES Enforcement Coordinator
U.S. Environmental Protection Agency
Region 6 Water Enforcement Branch (6ECDWM)
1201 Elm Street, Suite 500
Dallas, Texas 75202

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

If you have any questions about this inspection report, please contact Levi Dean at 505-365-3337 or at Levi Dean@state.nm.us.

Sincerely,

Susan LucasKamat Digitally signed by Susan LucasKamat
Date: 2022.11.21 12:49:48 -07'00'

Susan LucasKamat
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

Cc: Rachel Matthews, USEPA, matthews.rachel@epa.gov
Nancy Williams, USEPA, williams.nancy@epa.gov
Amy Andrews, USEPA, andrews.amy@epa.gov
David Esparza, USEPA, esparza.david@epa.gov
Mona Tates, USEPA, tates.mona@epa.gov
Ruben Alayon-Gonzalez, USEPA, Alayon-Gonzalez.Ruben@epa.gov
Brent Larson, USEPA, larsen.brent@epa.gov
William Chavez, MED, EHB, william.chavez@state.nm.us
James Montoya, Water/Wastewater Superintendent, tos_springer@yahoo.com

EPA

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 0 0 3 0 6 2 7 11	12 1 0 2 0 2 2 17	18 C	19 S 20	2

Remarks

M I N O R P U B L I C W A T E R T R E A T M E N T

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 0 1 69	70 4	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)*	Entry Time /Date	Permit Effective Date
SPRINGER WATER TREATMENT PLANT: 126 HWY 468, SPRINGER, NM; NORTH ON I-25 TO EXIT 412 AT SPRINGER, CONTUNUE 0.9 MILES ON MAXWELL AVE, CONTINUE 0.3 MILES ON RAILROAD AVE, TURN LEFT ON HWY 468, 1.9 MILES, TURN RIGHT ONTO FACILITY ACCESS ROAD (LOOK FOR OLD WTP), RIGHT ON ACCESS ROAD TO NEW WTP. COLFAX COUNTY	**1405/October 20, 2022**	November **19, 2018**
	Exit Time/Date **1535/October 20, 2022**	Permit Expiration Date **November 20, 2023**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

JAMES MONTOYA, SITE SUPERINTENDENT (505) 4832223

Name, Address of Responsible Official/Title/Phone and Fax Number
MR. Boe Lopez, MAYOR, TOWN OF SPRINGER
606 COLBERT AVE
SPRINGER, NEW MEXICO PHONE (505) 483-2682 FAX (505) 325-5525

Contacted: Yes [*] No [ ]

Other Facility Data

LAT 36.39203

LONG –104.61526

SIC 4941

Section C: Areas Evaluated During Inspection

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

S	Permit	S	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
M	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	S	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)

See further Explanations.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Levi Dean	**NMED/SWQB / 505-365-3337 / 505-827-2855**	**November 19, 2022**
Levi Dean Digitally signed by Levi Dean Date: 2022.11.19 15:51:07 -07'00'		
Signature of Management QA Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Susan Lucas Kamat Susan LucasKamat Digitally signed by Susan LucasKamat Date: 2022.11.21 12:49:25 -07'00'	**NMED/SWQB / 505-946-8924 / 505-927-2855**	**November 19, 2022**

SPRINGER WATER TREATMENT PLANT	PERMIT NO. NM0030627

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS:	☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED NO_)*
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. DETAILS:	☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED NO)*
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. DETAILS:	☐ S ☒ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED NO__)*
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

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. ☒ Y ☐ N ☐ NA
   TYPE OF DEVICE
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. *(DATE OF LAST CALIBRATION_____)* ☐ 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 NO)*
DETAILS:

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

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. _ % OF THE TIME. ☐ Y ☒ N ☐ NA

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

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

LAB NAME: **Hall Environmental**

LAB ADDRESS: **4901 Hawkins St NE, Albuquerque, NM 87109**

PARAMETERS PERFORMED: Total Aluminum, Total Copper, Total Nickel, total Phosphorus, Total Nitrogen

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS.

☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED YES_).*

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

RECEIVING WATER OBSERVATIONS

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED NO__).*
DETAILS: **SLUDGE TAKEN TO ARTHUR REGIONAL LANDFILL**

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: _____ (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 Springer Water Treatment Facility
NPDES Permit No. NM0030627
October 20, 2022

Further Explanations

Introduction

On October 20, 2022 a Compliance Evaluation Inspection (CEI) was conducted at the City of Springer Water Treatment Plant located northwest of Springer, New Mexico by Levi Dean and Daniel Valenta of the State of New Mexico Environment Department (NMED). This facility is classified as a minor municipal discharger under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned permit number NM0030627. The facility design is 0.280 million gallons per day (MGD).

The Springer WTP discharges into a non-classified, intermittent one of two concrete lined pond, thence to an non-classified ephemeral arroyo, thence to the Cimarron River, thence to the Canadian River in segment 20.6.4.306 of the Canadian River Basin (*State of New Mexico Standards for Interstate and Intrastate Surface Waters 20.6.4 NMAC*). The designated uses in this segment are irrigation, warmwater aquatic life, livestock watering, wildlife habitat, and secondary contact.

On the day of the inspection, the inspectors arrived at facility the facility at 1405 hours and met the Water Superintendent James Montoya. The inspectors made introduction, presented credentials, and discussed the purpose of the inspection. An exit interview to discuss preliminary finding of the inspection was conducted at the WWTP at 1535 hours with the Superintendent.

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 and/or NMED. Finding of the inspection are detailed on the attached EPA form 3560-3 and in the narrative Further Explanations section of the report.

Treatment Scheme

The Springer WTP treats surface water from two reservoirs. Overflows from the Upper reservoir drain via a spillway into the Lower reservoir from which raw water is drawn for treatment. The water treatment plant was built in 2005 and has a design capacity of one (1) million gallon per day. The facility serves a population of approximately 1285 residents. Treatment processes are conventional and include coagulation, flocculation, sedimentation, filtration, and disinfection. The treatment scheme primarily consists of chemical injection followed by two parallel package units, each compartmentalized into two flocculation chambers, a sedimentation basin, and a multi-media filter. Depending on water demand or maintenance schedule, one or both the package units may be place into service.

Raw water from the lower reservoir flows via gravity to a pump station (consisting of three pumps) and sent to the enclosed treatment plant. At the head of the plant, aluminum sulfate and cationic polymer are injected into the raw water within the intake pipes then flashed mixed. The water is next directed to the flocculation

chamber (in one or both package units) where the horizontal paddle wheel mixers enhance the coagulation-flocculation process. The wheel in the first section of the double-baffled chamber is equipped with four paddles and the wheel in the second has two. Following the flocculation chamber, flow enters the sedimentation basin and is thrust up through tube settlers. The upward movement of water through the tube settlers allows each tube to function as a small settling basin. This configuration creates a high ratio of settling surface area to per unit water volume. The comparatively high settling efficiency provided by the tube setters appear particularly appropriate for the small, rectangular sedimentation basins such as those installed at this facility. Every quarter settled solids are flushed out of the sedimentation basin into an approximately 60,000 gallon concrete detentions pond located adjacent to the treatment building.

From the sedimentation basin, water enters a multi-media filtration unit for removal of remaining suspended solids. Filter backwashing begins automatically at pre-set intervals based on continuously monitored effluent turbidity levels. To achieve grater process control, the operator may also manually backwash the filter media. All backwash water is discharged to the detention pond with no recycling/recovery treatment unit(s) in place. Filter-to-waste water, consisting of clean, filtered water generated at the beginning of each filtration cycle, is also discharged to the detention pond. An outlet pipe installed near the top of the detention pond decants and conveys wastewater to Outfall 001 located approximately 400 yards down gradient. Solids removed from the detention pond are currently placed into a covered container on-site pending disposal at the Arthur Regional Landfill in Wagon Mound, NM.

Following filtration through the multi-media unit, water is injected with chlorine as a disinfectant and flows into a 20,000 gallon clearwell situated beneath floor level. After a period of detention, finished water from the clearwell is pumped to a storage tank for distribution to the municipal drinking water supply system.

Further Explanations

Section B – Recordkeeping and Reporting Evaluation

Permit Requirement

The permit in Part III.C.3 RETENTION OF RECORDS states:
The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement. report, or application. This period may be extended by request of the Director at any time.

Finding

Maintenance log at facility were not up to date at the time of the inspection.

Section C – Operations and maintenance

Concern
Inspector recommends having an onsite generator in case of power failure.

Section F – Self-monitoring "Laboratory"

Permit Requirement

The Permit in Part III.C.5.c MONITORING PROCEDURES states:
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.

Finding

Lab records indicate duplicate samples were not taken for 10% of the collected samples.

NMED/SWQB
Official Photograph Log

Photo # 1

Photographer: Daniel Valenta	Date: October 20, 2022	Time: 1328 hours
City/County: Town of Springer/ Colfax County		
Location: Springer Water Treatment Plant		
Subject: Concrete detentions pond		

Photo # 2

Photographer: Daniel Valenta	Date: October 20, 2022	Time: 1349 hours
City/County: Town of Springer/ Colfax County		
Location: Springer Water Treatment Plant		
Subject: Anoxic basin where denitrification takes place		