

**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	08/15/2018		
Media:	Water		
Regulatory Program(s)	CWA		
Company Name:	City of Roswell		
Facility Name:	Roswell Wastewater Treatment Plant		
Facility Physical Location:	2306 E. College Road		
(city, state, zip code)	Roswell, New Mexico		
Mailing address:	Post Office Drawer 1838		
(city, state, zip code)	Roswell, New Mexico 88201		
County/Parish:	Chavez		
Facility Contact:	Andrew Valadez	Wastewater Treatment Plant Supervisor	
	a.valadez@roswell-nm.gov		
FRS Number:	110039926925		
Identification/Permit Number:	NM0020311		
Media Number:	N/A		
NAICS:	221320		
SIC:	4952		
Personnel participating in inspection:			
Andrew Valadez	City of Roswell	Wastewater Supervisor	575-622-1449
Manuel Sisneros	City of Roswell	Wastewater Operator	575-622-1449
David Esparza	USEPA	Environmental Engineer	505-366-8402
EPA Lead Inspector Signature/Date			
	David Esparza		Date
Supervisor Signature/Date			
	Carol Peters		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors David Esparza, PE, arrived at the City of Roswell Wastewater Treatment Plant (WWTP) (hereinafter referred to as WWTP) at approximately 8:00 AM on August 15, 2018 for an unannounced inspection. I met with Mr. Andrew Valadez, Wastewater Supervisor, presented my credentials and informed him that this was an EPA inspection to determine the WWTP's compliance under the Clean Water Act (CWA). This compliance evaluation inspection (CEI) was conducted under the authority of the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the CWA. The generation of this report is based on information supplied by Roswell representatives, observations made by the United States Environmental Protection Agency (US EPA) inspector, and records and reports maintained by the permittee (Roswell), and the US EPA. Before leaving the facility, an exit briefing was held at 12:00 PM with Mr. Valadez to explain areas of concern noted at the time of the inspection and request representative photograph copies of the WWTPs records.

FACILITY DESCRIPTION

The WWTP is a major discharger with a design flow of 7.0 million gallons per day (MGD) and average daily flow of approximately 3.4 MGD. The facility is located at 2306 E. College Road, Roswell, Chavez County, New Mexico (depicted in Aerial Image #1 below). The WWTP facility serves a population of approximately 48,600 (2014 US Census) residents. The WWTP is operated by staff within the Public Works Department and consists of 9 full-time equivalent (FTE) positions, exclusive of administrative support during the hours of 7:00 AM to 3:30 PM seven (7) days during the regular work week and 7:00 AM to 9:00 AM on the weekends. On-call staff is available on an as needed basis.



Aerial Image #1: Overall view of the City of Roswell’s Wastewater Treatment Plant. Aerial from Google Earth maps.

A Supervisory Control and Data Acquisition (SCADA) system provides around the clock monitoring of WWTP operations. After entering the WWTP facility via three (3) lift stations raw influent traverses through a pump station, thence 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 (Appendix 1 Photograph 2, 3 and 4). It then flows into the final clarifiers. According to WWTP records for the months of May (69,575-gallons), June (146,700-gallons) and July (18,300-gallons) an average of approximately 19,550 gallons of septage per week was received. The facility staff monitors incoming registered septage haulers for pH and grease to determine compatibility with the WWTP for acceptance or rejection.

The WWTP maintains a backup diesel generator for power that is exercised weekly, typically every Friday.

Following the belt press, the sludge is placed in concrete drying beds (underdrains return excess liquid to the headworks) for composting into Class A sludge for land application and/or local agricultural purposes.

The WWTP discharges to the Rio Hondo typically 1-3 months out of the year (December to March). Last year (2017) the WWTP discharged only during the month of January as it is area temperature dependent and has not discharged during the 2018 calendar year. The remainder of the year, the treated effluent is used to irrigate approximately 1,100-acres of cropland and 200-acres of golf course turf. Additionally, the WWTP uses the water to irrigate the facility grounds, wash water on the fine screen bar screen and

the gravity belt thickener. It should be noted the WWTP does not maintain a retention pond for re-use water. All disinfected water not used for facility purposes is pumped directly to the area farmers.

If there is a discharge to Outfalls 001 and/or 002, samples are collected via an automatic sampler located after two (2) banks of ultraviolet (UV) disinfection (Appendix 1 Photograph 5). Routine weekly maintenance is performed on the UV system to ensure the proper disinfection of the effluent and operation of the treatment system.

Currently the established Industrial Users (IU) are Dean Baldwin Paint LLC., EA Engineering, Science and Technology (PBC on behalf of the USEPA), Christmas by Krebs and CH2M (USEPA contractor). The City of Roswell and the above identified entities entered into individual wastewater discharge agreements for the disposal of variable treated effluent amounts ranging from 1,500 gpd (gallon per day) to 44,000 gpd into the City's WWTP.

Section II – OBSERVATIONS

I observed the following and the following information was provided and/or stated:

- As a final aspect of the inspection the WWTP laboratory's analytical methods were surveyed for compliance with the 40 CFR 136. The most significant issue noted during this part of the inspection was the non-operating heating ventilation and air conditioning (HVAC) cooling in a portion of the laboratory. Sample containers and the contents therein, had to be moved from the non-temperature-controlled portion to a more hospitable portion of the laboratory. The HVAC units had been removed as part of a reroofing project that was behind schedule.
- An additional observation was the laboratory's use of "over the counter" distilled water in their analytical processes. This is potentially contrary to the American Society for Testing & Materials (ASTM) standard operating procedures (SOPs) pursuant to Reagent Water (1080)/Reagent Water Quality. Standard methods with respect to specific SOPs were requested by laboratory personnel.
- The WWTP on-site laboratory maintains and updates its written SOP's as necessary, inclusive of appropriate annual equipment certifications and/or calibrations.
- The WWTP had secure perimeter fencing; thus, limiting access. The overall WWTP's operations and maintenance (O&M), and general facility housekeeping appeared to be in good order.

Section III – AREAS OF CONCERN

After the on-site inspection, the EPA inspector met with City of Roswell WWTP representatives for a closing conference at 12:00 PM. During this conference, the inspector discussed observations noted during the inspection. These observations included:

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Section IV – FOLLOW UP

The requested information with respect to Reagent Water (1080)/Reagent Water Quality was forwarded via email to the City of Roswell WWTP.

Section V – LIST OF APPENDICES

- Appendix 1 – Photo Log – 6 photos taken 08/14/2018
- Appendix 2 – Opening conference sign-in sheet
- Appendix 3 – Current Wastewater Treatment Plant Site Plan
- Appendix 4 – City of Roswell Septage Spill Response and SSO Protocol
- Appendix 5 – City of Roswell Wastewater Treatment Plant Operator Certifications