

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	06/25/2025	
Media Program:	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 88202-1838	
County/Parish:	Chavez	
Facility Phone Number	575-622-1449 x 3307	
Facility Contact:	Naomi Steward	Wastewater Supervisor
	n.steward@roswell-nm.gov	
FRS Number:	110039926925	
Identification/Permit Number:	NM0020311	
Media Identifier Number:	N/A	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Andrew Valadez	City of Roswell	Utilities Director
Naomi Steward	City of Roswell	Wastewater Supervisor
David Esparza	EPA-ECDWM	Environmental Engineer
EPA Lead Inspector Signature/Date		
	David Esparza	Date
Supervisor Signature/Date		
	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector David Esparza, PE, arrived at the City of Roswell Wastewater Treatment Plant (WWTP) at approximately 8:30 AM on June 25, 2025, for an announced inspection. I met with Mr. Andrew Valadez, Utilities Director, presented my credentials and informed him that this was an EPA inspection to determine the WWTP's compliance under the Clean Water Act (CWA). We were later joined by Ms. Naomi Steward, Wastewater Supervisor. 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 on June 25, 2025, an exit briefing was held with Mr. Valadez and Ms. Naomi Steward, to explain areas of concern noted at the time of the inspection and discuss the Capacity Management Operations and Maintenance (CMOM) checklist forwarded via electronic mail (email) earlier in our discussion (**Appendix 1** Capacity Management Operations and Maintenance Self-Assessment). **Note:** The City of Roswell's existing NPDES permit became effective on January 1, 2020, and had an expiration date of December 31, 2024. A permit renewal application was submitted on July 22, 2024.

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 3.1 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 48,000 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 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. The WWTP is a gravity flow system with four (4) lift stations (LS), (identified in Table 1 below). After entering the WWTP 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. It then flows into the final clarifiers. The facility staff monitors incoming registered septage haulers for pH and grease to determine compatibility with the WWTP for acceptance or rejection.

Table 1: City of Roswell Lift Stations

Lift Station Name	Location by Street Address	Comment
Roswell International Air Center (RIAC)	1211 E Hobson Rd	Back-up power
Mistic	122 Will Rogers Rd.	
Kids Care	3751 N Main	
Mescalero	1000 E Mescalero	

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

It was stated the WWTP has not discharged to the Rio Hondo in approximately 2-years but utilizes the treated effluent 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. Routine weekly maintenance is performed on the UV system to ensure the proper disinfection of the effluent.

Currently the established Industrial Users (IU) includes Dean Baldwin Paint LLC., and Vestis (f.k.a. Aramark). 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 (gallons per day) to 44,000 gpd into the City's WWTP.

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

Section II - OBSERVATIONS

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

- A review of the City of Roswell completed CMOM Self-Assessment: **General Information** (page 2)- indicates an average daily flow of 3.1 MGD of the design capacity 7 MGD.
- A review of the City of Roswell completed CMOM Self-Assessment: **Collection System Information** (page 3)- indicates 4 lift or pump stations (identified in Table 1 above), and an approximate service area of 30 square miles. Further discussion regarding the CMOM indicates that 20% of the total piping, equates to 26-years old and less than 50-years old and the remaining 80% approximately 75-years old. The CMOM further states 80% of the piping is constructed of vitrified clay pipe (VCP) and 20% of polyvinyl chloride pipe (PVC).
- A review of the City of Roswell completed CMOM Self-Assessment: **Budgeting (BUD)** (page 10)- does not identify a percentage of the utility 's overall budget being allocated to maintenance of the collection system (**\$BUD-06**).
- A review of the City of Roswell completed Self-Assessment: **Training (TR)** (page 12) indicates the utility does have a formal job knowledge, skills, and abilities (KSA) training program(**\$TR-01**), but indicates 100% of the training goals is on-the-job (**\$TR-10**).
- A review of the City of Roswell completed CMOM Self-Assessment: **Safety (SAF)** (page 14) does not indicate the utility has a written safety policy in place (**\$SAF-01**).
- A review of the City of Roswell completed CMOM Self-Assessment: **Customer Service (CS)** (page 17) does not indicate the utility has a customer service and public relations program (**\$CS-01**), or customer service evaluation program to obtain feedback from the community in place (**\$CS-08**).
- A review of the City of Roswell completed CMOM Self-Assessment: **Equipment & Collection System**

Maintenance (ESM) (page 17 and page 18) indicates the utility does not maintain maintenance schedule records (§ESM-02), there is not an established system for prioritizing equipment maintenance needs (§ESM-04), and corrective repair work orders are not backlogged more than six months (§ESM-06).

- A review of the City of Roswell completed CMOM Self-Assessment: **Equipment Parts Inventory (EPI)** (page 18 and page 19) indicates the utility has not identified critical spare parts (§EPI-01), adequate supplies are not on hand to allow for two-point repairs (§EPI-02), the system does not have a parts standardization policy in place (§EPI-03), does not maintain a stock of spare parts on its maintenance vehicles (§EPI-05), and does not have a system in place to track and maintain an accurate inventory of spare parts (§EPI-06).
- A review of the City of Roswell completed CMOM Self-Assessment: **Management Information System (MIS)** (page 20) indicates there are not written instructions for managing and tracking scheduled system inventory, safety incidents, equipment/tools tracking or parts inventory (§MIS-04). Additionally, it is not clear how often the management information system is updated (§MIS-06).
- A review of the City of Roswell completed CMOM Self-Assessment: **System Mapping (MAP)** (page 21 and page 22) indicates "as built" plans (record drawings) or maps are not available for use by field crews in the office and in the field (§MAP-01), and there is not a procedure for field crews to record changes or inaccuracies in the maps and update the mapping system (§MAP-02). Additionally, the System Mapping does not record the following scale, property lines, SSO occurrences, pipe material, installation date, flow meters, slope, manhole rim elevation, manhole coordinates, or manhole invert elevation (§MAP-04). **Note:** the city states it does have a combined sewer. Furthermore, these additional manhole attributes shape, type (e.g., precast, cast in place, etc.) or age are not recorded (§MAP-06).
- A review of the City of Roswell completed CMOM Self-Assessment: **Internal TV Inspection (TVI)** (page 23) indicates the utility does not have a standardization pipeline condition assessment program (§TVI-01). It is not clear if a written operation procedures/guidelines for the internal TV inspection program exists (§TVI-03), inclusive of records indicating pipe size, type, length, and joint spacing, distance recorded by internal TV, results of the internal TV inspection (including a structural rating), internal TV operator name, cleanliness of the line and location and identification of line being televised by manholes (§TVI-04). Furthermore, a rating system is not used to determine the severity of the defects found during the inspection process (§TVI-05), a code list is not used for internal TV inspection reporting (§TVI-06), though the total defects determined by TV inspection, during the past 5, years are attributed to the following: debris/grease/roots, intruding tap/roots, surcharges, offset joint/grease, and line failure are not identified (§TVI-07).
- A review of the City of Roswell completed CMOM Self-Assessment: **Sewer Cleaning (CLN)** (page 25 and page 26) indicates there is not a program to identify sewer line segments, with chronic problems, that should be cleaned on a more frequent schedule (§CLN-01), though it also states the entire system is cleaned weekly. It further states the city does not have a root control program (§CLN-05), and it is not clear if stoppages are plotted on maps and correlated with other data such as pipe size and material or location (§CLN-09).

- A review of the City of Roswell completed CMOM Self-Assessment: **Manhole Inspection and Assessment (MAN)** (page 26 and page 27) indicates the city does not have routine manhole inspection and assessment program (§MAN-01), does not have a goal for the number of manholes inspected annually (§MAN-03), inflow from manhole covers, presence of infiltration, location, and estimated quantity, inflow from manhole covers (§MAN-05), or a grouting program (§MAN-06).
- A review of the City of Roswell completed CMOM Self-Assessment: **Pump Stations (PS)** (page 28 and page 29) indicates the city does not have an emergency operating procedure for each pump station (§PS-03), only 1 of the 4 pump stations are equipped with backup power sources (§PS-05), and there is not a procedure for manipulating pump operations during wet weather to increase in-line storage of wet weather flows (§PS-07). Additionally, records are not maintained for each inspection (§PS-13) and 12% of the pump stations are equipped with permanent flow meters (§PS-19).
- A review of the City of Roswell completed CMOM Self-Assessment: **Capacity Assessment (CA)** (page 30) indicates that the city does not have a flow monitoring program (§CA-01), a comprehensive capacity assessment and planning program (§CA-02), or a tool (hydraulic model, spreadsheet, etc.) for assessing whether adequate capacity exists in the sewer system (§CA-04).
- A review of the City of Roswell completed CMOM Self-Assessment: **Tracking SSOs (TRK)** (page 32 and page 33) is not clear if the city, has reported any SSO event in the past 5 years (§TRK-01).
- A review of the City of Roswell completed CMOM Self-Assessment: **Overflow Emergency Response (OERP)** (page 35) indicates the city does not have a documented OERP available for utility staff to use (§OERP-01). Additionally, it is not clear if specific responsibilities for personnel who respond to emergencies are detailed (§OERP-03), if staff are continuously trained to respond to emergencies (§OERP-04), or if work crews have immediate access to tools and equipment during emergencies (§OERP-05). Furthermore, it is not clear if procedures to limit public contact with areas affected by SSOs (§OERP-09), or containment techniques to protect storm systems exist (§OERP-10).
- A review of the City of Roswell completed CMOM Self-Assessment: **Smoke & Dye Testing (SDT)** (page 36 and page 37) indicates the city does not have a smoke testing program to identify sources of inflow and infiltration (§SDT-01), a smoke testing program to identify sources of inflow and infiltration in illegal connectors (§SDT-01A), or a smoke testing program to identify sources of inflow and infiltration in house laterals (private service laterals (§SDT-01B).
- A review of the City of Roswell completed CMOM Self-Assessment: **Hydrogen Sulfide Monitoring and Control (HSMC)** (page 38 and page 39) indicates the city does not have a program to rate the system vulnerability for hydrogen sulfide corrosion or any associated aspects (§HSMC-01).

During the closing conference, David Esparza discussed the requested completion of the Capacity, Management, Operation and Maintenance (CMOM) Self-Assessment document.

Section III – AREAS OF CONCERN

A review of the of the CMOM self-assessment completed by the City of Roswell, and additional supporting information, indicates some of the following or could be beneficial:

- A review of the City of Roswell completed CMOM Self-Assessment indicates it is not clear the city, has reported any SSO events in the past 5 years.
- Preparation of an Overflow Emergency Response Plan (OERP) delineating specific utility staff responsibilities to responding emergencies, a public notification plan and procedures to limit public contact with areas affected by sanitary sewer overflow (SSO) events.
- Preparation of an Internal TV Inspection (TVI), Sewer Cleaning (CLN), Manhole Inspection and Assessment (MAN) program.
- Preparation/creation of supporting documentation to complement the tracking maintenance activities within the existing Management Information System (MIS).
- Preparation of an Equipment & Collection System Maintenance (ESM) and Equipment Parts Inventory (EPI) program. Given the recent experiences of supply chain delays, it is paramount to day-to-day operations and permit compliance.
- Preparation of a newsletter or notification procedure for regular communication/coordination with other municipal departments to facilitate Internal Communications (IC).
- Preparation of a formal Training (TR) job knowledge, skills, and abilities (KSA) training program to assist and encourage safe work practices and potential position advancement.

EPA Region 6 inspector David Esparza, PE conducted a closing conference at the Roswell WWTP at approximately 1:00 PM on June 25, 2025, for the inspection. During the closing conference, David Esparza discussed the requested completion of the Capacity, Management, Operation and Maintenance (CMOM) Self-Assessment document.

ADDITIONAL AREAS of CONCERN:

- A review of the submitted Integrated Compliance Information System (ICIS) Discharge Monitoring Reports (DMR) data for the period January 21, 2022, through March 31, 2025, indicates NPDES permit exceedances with respect to Oxygen, dissolved (DO) and Whole Effluent Toxicity (WET) (Appendix 2 ICIS E90 Effluent Violations).
- A review of the submitted Integrated Compliance Information System (ICIS) Discharge Monitoring Reports (DMR) data for the period January 4, 2024, through May 8, 2025, indicates Roswell experienced 7 sanitary sewer overflow (SSO) events (Appendix 3 ICIS E80 Effluent Violations).

Section IV – FOLLOW UP

The following information and/or clarification was received by EPA after exiting on June 25, 2025:

- Completed Capacity Management Operations and Maintenance Self-Assessment

Section V – LIST OF APPENDICES

Appendix 1 – Capacity Management Operations and Maintenance Self-Assessment

Appendix 2 – Review of the ICIS E90 Effluent Violations

Appendix 3 – Review of the ICIS E80 Effluent Violations

Appendix 1

Capacity Management Operations and Maintenance Self-Assessment (CMOM)

CAPACITY, MANAGEMENT, OPERATION AND MAINTENANCE (CMOM) Program Self-Assessment

Compiled By:

Name: ___Naomi Steward_____

Title: ___Superintendent_____

Date: ___07/11/2025_____

Staffing list and Organization chart: Attach separate document as needed

General Information

Service area	29.7	Service population	47,836
	SQ. MILES		PEOPLE
Annual precipitation	12.91 inches*	*Based off the link below 1/1893-6/2016	
	NUMBER		

*Find your annual New Mexico precipitation here: <https://wrcc.dri.edu/summary/Climsmnm.html>

# of Treatment Facilities	1	WWTP design capacity	7 MGD
	NUMBER		MGD
Average Daily Flow	3.1	Average dry weather flow	3.1
	MGD		MGD
Manholes		Number of air vacuum relief valves	
	NUMBER		NUMBER

Service Area Characteristics

Residential	X	Commercial	X
Industrial	X	Institutional	X
Multi-Family	X	Other	
	NUMBER		NUMBER
Total			
		NUMBER	

Collection system service lateral responsibility (check one)

At main line connection only	
From main line to property line or easement/cleanout	X
Beyond property line/clean out	
Other:	

Comments:

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What percent of sewer system is served by combined sewers (i.e., sanitary sewage and storm water in the same pipe)?	2
	PERCENT

Collection System Information

Conveyance & Pumping		Pump Stations		Vacuum Stations		
	Gravity Sewers	Stations	Force Mains	Stations	Vacuum Lines	Force Mains
Pipes and pumps: Length/quantity		4				
	MILES	NUMBER	MILES	NUMBER	MILES	MILES
Age of system: 0-25 years old						
	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT	PERCENT
26-50 years old						
	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT	PERCENT
51-75 years old						
	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT	PERCENT
>75 years old	70					
	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT	PERCENT
Number of Inverted siphons						
	NUMBER					

Pipe Diameter Information	Gravity Sewers	Force Mains	Vacuum Lines
8 inches or less			
	PERCENT	PERCENT	PERCENT
9 - 14 inches			
	PERCENT	PERCENT	PERCENT
15 - 36 inches			
	PERCENT	PERCENT	PERCENT
> 36 inches			
	PERCENT	PERCENT	PERCENT

Comments:

Pipe Material Information	Gravity Sewer	Force Mains	Vacuum Lines
Prestressed concrete cylinder pipe (PCCP)			
	PERCENT	PERCENT	PERCENT
High density polyethylene (HDPE)			
	PERCENT	PERCENT	PERCENT
Reinforced concrete pipe (RCP)			
	PERCENT	PERCENT	PERCENT
Polyvinyl Chloride (PVC)	20		
	PERCENT	PERCENT	PERCENT
Vitrified Clay Pipe	80		
	PERCENT	PERCENT	PERCENT
Cast Iron Pipe (CIP), Ductile Iron Pipe (DIP)			
	PERCENT	PERCENT	PERCENT
Non-reinforced concrete pipe			
	PERCENT	PERCENT	PERCENT
Asbestos cement pipe			
	PERCENT	PERCENT	PERCENT
Brick			
	PERCENT	PERCENT	PERCENT
Fiberglass			
	PERCENT	PERCENT	PERCENT
Cured in Place			
	PERCENT	PERCENT	PERCENT
Fold and Form			
	PERCENT	PERCENT	PERCENT

Comments:

Engineering Design (ED)

Checklist Item		Yes	No	N/A
ED-01	Is there a document which includes design criteria and standard construction details?	X		
	Comments:			
ED-02	Is there a document that describes the procedures that the utility follows in construction design review?	X		
	Comments:			
ED-03	Are WWTP and O&M staff involved in the design review process?	X		
	Comments:			
ED-04	Is there a procedure for testing and inspecting new or rehabilitated system elements both during and after the construction is completed?	X		
	Comments:			
ED-05	Are construction sites supervised by qualified personnel (such as professional engineers) to ascertain the construction is in accordance with the agreed upon plans and specifications?	X		
	Comments:			
ED-06	Are new manholes tested for inflow and infiltration?			X
	Comments:			
ED-07	Are new gravity sewers checked using closed circuit TV inspection?	X		
	Comments:			
ED-08	Does the utility have documentation on private service lateral design and inspection standards?		X	
	Comments:			
ED-09	Does the utility attempt to standardize equipment and sewer system components?		X	
	Comments:			
Comments:				

Satellite Communities and Sewer Use Ordinance (SUO)

Checklist Item		Yes	No	N/A
SUO-01	Does the utility receive flow from satellite communities? IF NO, GO TO NEXT SECTION		X	
	Comments:			
SUO-02	What is the total area from satellite communities that contribute flow to the collection system? (<i>Acres or square miles</i>)			
	Comments:			
SUO-03	Does the utility require satellite communities to enter into an agreement? IF NO, GO TO QUESTION SUO-06		X	
	Comments:			
SUO-04	Does the agreement include the requirements listed in the sewer use ordinance?			
	Comments:			
SUO-05	Do the agreements have a date of termination and allow for renewal under different terms?			
	Comments:			
SUO-06	Does the utility maintain a legal authority to control the maximum flow introduced into the collection system from satellite communities?			X
	Comments:			
SUO-07	Are standards, inspections, and approval for new connections clearly documented in a SUO?			X
	Comments:			
SUO-08	Does the SUO require satellite communities to adopt the same industrial and commercial regulatory discharge limits as the utility?			X
	Comments:			
SUO-09	Does the SUO require satellite communities to adopt the same inspection and sampling schedules as required by the pretreatment ordinance?			X
	Comments:			
SUO-10	Does the SUO require satellite communities or the utility to issue control permits for significant industrial users?			X
	Comments:			

Checklist Item		Yes	No	N/A
SUO-11	Does the SUO contain provisions for addressing overstrength wastewater from satellite communities?			X
	Comments:			
SUO-12	Does the SUO contain procedures for the following?			
	Inspection standards	X		
	Pretreatment requirements	X		
	Building/sewer permit issues	X		
	Comments:			
SUO-13	Does the SUO contain general prohibitions of the following materials?			
	Fire and explosion hazards	X		
	Corrosive materials	X		
	Obstructive materials	X		
	Oils or petroleum	X		
	Material which may cause interference at the wastewater treatment plant	X		
	Comments:			
SUO-14	Does the SUO contain procedures and enforcement actions for the following?			
	Fats, oils, and grease (FOG)	X		
	Infiltration and inflow	X		
	Building structures over the sewer lines	X		
	Storm water connections to sanitary lines (downspouts)	X		
	Defects in service laterals located on private property	X		
	Sump pumps, air conditioner connections			X
	Comments:			

Comments:

Organizational Structure (OC)

Checklist Item		Yes	No	N/A
OC-01	Is an organizational chart available that shows the overall personnel structure for the utility, including operation and maintenance staff?	X		
	Comments:			
OC-02	Are up-to-date job descriptions available that delineate responsibilities and authority for each position?	X		
	Comments:			
OC-03	Are the following items discussed in the job descriptions?			
	Nature of work to be performed	X		
	Minimum requirements for the position	X		
	Necessary special qualifications or certifications	X		
	Examples of the type of work	X		
	List of licenses required for the position	X		
	Performance measures or promotion potential	X		
	Comments:			
OC-04	What percent of staff positions are currently vacant?	20%		
	Comments:			
OC-05	On average how long do positions remain vacant? (<i>months</i>)	APPROX 1MO		
	Comments: POSITIONS ARE FILLED IMMEDIATELY BASED ON THE POOL OF APPLICANTS			
OC-06	What percent of utility work is contracted out?	10%		
	Comments:			

Comments:

Internal Communications (IC)

Checklist Item		Yes	No	N/A
IC-01	Which of the following methods are used to communicate with utility staff?			
	Regular meetings	X		
	Bulletin boards	X		
	E-mail	X		
	Cell Phones	X		
	Other (explain)			
	Comments:			
IC-02	How often are the staff meetings held? (e.g., Daily, Weekly, Monthly, etc.)			
	<i>CASE TO CASE BASIS</i>			
IC-03	Are incentives offered to employees for performance improvements?		X	
	Comments:			
IC-04	Does the utility have an "Employee of the Month/Quarter/Year" program?	X		
	Comments: UOCP NMED "OPERATOR OF THE YEAR"			
IC-05	How often are performance reviews conducted? (e.g. Semi-annually, Annually, etc.)			
	<i>6 MONTHS PROBATIONARY PERIOD</i>			
IC-06	Does the utility regularly communicate/coordinate with other municipal departments?	X		
	Comments: MONTHLY INFRASTRUCTURE MEETINGS @ CITY HALL			

Comments:

Budgeting (BUD)

Checklist Item		Yes	No	N/A
BUD-01	What is the average annual fee for residential users? Avg. \$5.84			
	Comments: Based off information available 0.87 per 1,000 gal			
BUD-02	How often are user charges evaluated and adjusted? (e.g. annually, biannually. etc.)			
	Comments:			
BUD-03	Are utility-generated funds used for non-utility programs?		X	
	Comments:			
BUD-04	Are costs for collection system operation and maintenance (O&M) separated from other utility services such as water, storm water, and treatment plants? IF NO, GO TO BUD-07	X		
	Comments:			
BUD-05	What is your average annual (O&M) budget?			
	Comments:			
BUD-06	What percentage of the utility's overall budget is allocated to maintenance of the collection system?			
	Comments:			
BUD-07	Does the utility have a Capital Improvement Plan (CIP) that provides for system repairs/replacements on a prioritized basis?	X		
	Comments:			
BUD-08	What is your average annual CIP budget?			
	Comments:			

Comments:

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Checklist Item		Yes	No	N/A
BUD-09	What percentage of the maintenance budget is allotted to the following maintenance?			
	Predictive maintenance -			
	Preventive maintenance -			
	Corrective maintenance -			
	Emergency maintenance -			
	Comments:			
BUD-10	Does the utility have a budgeted program for the replacement of under-capacity pipes?			
	Comments:			
BUD-11	Does the utility have a budgeted program for the replacement of over-capacity pipes?			
	Comments:			

Comments:

Training (TR)

Checklist Item		Yes	No	N/A
TR-01	Does the utility have a formal job knowledge, skills, and abilities (KSA) training program?	X		
	Comments:			
TR-02	Does the training program address the fundamental mission, goals, and policies of the utility?	X		
	Comments:			
TR-03	Does the utility have mandatory training requirements identified for key employees?	X		
	Comments:			
TR-04	What percentage of employees met or exceeded their annual training goals during the past year?			
	Comments:			
TR-05	Does the utility provide training in the following areas?			
	Safety	X		
	Routine line maintenance	X		
	Confined space entry	X		
	Traffic control	X		
	Record keeping	X		
	Electrical and instrumentation			
	Pipe repair	X		
	Bursting / CIPP			
	Public relations			
	SSO/Emergency response	X		
	Pump station operations and maintenance	X		
	CCTV and trench/shoring	X		
	Other			
	Comments:			
TR-06	Are operator and maintenance certification programs used? IF NO GO TO TR-08	X		
	Comments:			

TR-07	Are operator and maintenance certification programs required?	X		
	Comments: For appropriate personnel.			
TR-08	Is on-the-job training progress and performance measured?			
	Comments:			
Checklist Items		Yes	No	NA
TR-09	Which of the following methods are used to assess the effectiveness of the training?			
	None			
	Periodic testing			
	Drills			
	Demonstrations			
	Comments:			
TR-10	What percentage of the training offered by the utility is in the form of the following?			
	Manufacturer training			
	On-the-job training 100			
	In-house classroom training			
	Industry-wide training			
	Comments:			

Safety (SAF)

Checklist Item		Yes	No	N/A
SAF-01	Does the utility have a written safety policy?			
	Comments:			
SAF-02	How often are safety procedures reviewed and revised? (Annually, quarterly, etc.)			
	Comments:			
SAF-03	Does the utility have a safety committee?	X		
	Comments:			
SAF-04	Are regular safety meetings held with the utility employees?	X		
	How often?			
	Comments:			
SAF-05	Does the utility have a safety training program?	X		

	Comments:			
SAF-06	Are records of employee safety training kept up to date?	X		
	Comments:			
	Checklist Item	Yes	No	N/A
SAF-07	Does the utility have written procedures for the following?			
	Lockout/tagout	X		
	Material safety data sheets (MSDS)	X		
	Chemical handling	X		
	Confined spaces permit programs	X		
	Trenching and excavations safety	X		
	Biological hazards in wastewater	X		
	Traffic control and work site safety	X		
	Electrical and mechanical systems	X		
	Pneumatic and hydraulic system safety	X		
	Comments:			
SAF-08	What is your agency's lost-time injury rate?			
	Comments:			
SAF-09	Are the following equipment items available and in adequate supply?			
	Rubber/disposable gloves	X		
	Confined space ventilation equipment	X		
	Hard hats, safety glasses, rubber boots	X		
	Antibacterial soap and first aid kit	X		
	Tripods or non-entry rescue equipment			
	Fire extinguishers	X		
	Equipment to enter manholes			
	Portable crane/hoist	X		
	Atmospheric testing equipment and gas detectors			
	Oxygen sensors			
	H2S Monitors	X		
	Full body harness	X		
	Protective clothing	X		
	Traffic/public access control equipment			
	5-minute escape breathing devices			
	Life preservers for lagoons			N/A
	Life preservers at activated sludge plants	X		
	Fiberglass or wooden ladders for electrical work	X		
	Respirators and/or self-contained breathing apparatus			
	Methane gas or optical vector (OVA) analyzer			
	Lower explosion limit (LEL) metering			

	Comments:		
SAF-10	Are safety monitors clearly identified?	X	
	Comments:		

Customer Service (CS)

Checklist Item		Yes	No	N/A
CS-01	Does the utility have a customer service and public relations program? IF NO GO TO CS-03			
	Comments:			
CS-02	Does the customer service program include giving formal presentations on the wastewater field to the following?			
	Schools and universities			
	Community gatherings			
	Local officials			
	Businesses			
	Media			
	Citizens			
	Building Inspector(s)			
	Public utility officials			
	Comments:			
CS-03	Are employees of the utility specifically trained in customer service?		X	
	Comments:			
CS-04	Are there sample correspondence, Q/A's, or "scripts" to help guide staff through written or oral responses to customers?		X	
	Comments:			
CS-05	What methods are used to notify the public of major construction or maintenance work?			
	Door hangers		X	
	Public radio or T.V. announcements	X		
	Newspaper	X		
	Flyers		X	

	Signs	X		
	Other	X		
	None			
	Comments: ANNOUNCEMENTS ON SOCIAL MEDIA PLATFORMS			
	Checklist Item	Yes	No	N/A
CS-06	Is a homeowner notified prior to construction that his/her property may be affected?	X		
	Comments:			
CS-07	Do you provide information to residents on cleanup and safety procedures following basement backups and overflows from manholes when they occur?	X		
	Comments:			
CS-08	Does the utility have a customer service evaluation program to obtain feedback from the community?		X	
	Comments:			
CS-09	Do customer service records include the following information?			
	Personnel who received the complaint or request	X		
	Nature of the complaint or request	X		
	To whom the follow-up action was assigned	X		
	Date of the complaint or request	X		
	Date the complaint or request was resolved	X		
	Total days to end the problem		X	
	Name, address, and telephone number of the customer	X		
	Location of the problem	X		
	Date the follow up action was assigned	X		
	Cause of the problem			
	Feedback to customer	X		
	Comments: Asset Essentials work order has the bulk of this information			
CS-10	Does the utility have a goal for how quickly customer complaints (or emergency calls) are resolved? IF NO, GO TO NEXT SECTION	x		

	Comments:
CS-11	What percentage of customer complaints (or emergency calls) are resolved within the timeline goals? 99%
	Comments:

Equipment & Collection System Maintenance (ESM)

Checklist Item		Yes	No	N/A
ESM-01	Is a maintenance card or record kept for each piece of mechanical equipment within the collection system? IF NO, GO TO ESM-03	X		
	Comments:			
ESM-02	Do equipment maintenance records include the following information?			
	Maintenance recommendations	X		
	Instructions on conducting the specific maintenance activity	X		
	Other observations on the equipment	X		
	Maintenance schedule	X		
	A record of maintenance on the equipment to date	X		
ESM-03	Comments:			
ESM-04	Are dated tags used to show out-of-service equipment?	X		
	Comments:			
ESM-05	Is there an established system for prioritizing equipment maintenance needs?	X		
	Comments:			
ESM-06	What percent of repair funds are spent on emergency repairs?			25%
	Comments:			
ESM-07	Are corrective repair work orders backlogged more than six months?		X	
	Comments:			
ESM-08	Do collection system personnel coordinate with state, county, and local personnel on repairs, before the street is paved?	X		

	Comments:
--	------------------

Comments:

Equipment Parts Inventory (EPI)

Checklist Item		Yes	No	N/A
EPI-01	Have critical spare parts been identified?		x	
	Comments:			
EPI-02	Are adequate supplies on hand to allow for two-point repairs in any part of the system?		x	
	Comments:			
EPI-03	Is there a parts standardization policy in place?		x	
	Comments:			
EPI-04	Does the utility have a central location for storing spare parts?	x		
	Comments:			
EPI-05	Does the utility maintain a stock of spare parts on its maintenance vehicles?		x	
	Comments:			
EPI-06	Does the utility have a system in place to track and maintain an accurate inventory of spare parts?		x	
	Comments:			
EPI-07	For those parts which are not kept in inventory, does the utility have a readily available source or supplier?	x		
	Comments:			

Comments:

Management Information System (MIS)

Checklist Item		Yes	No	N/A
MIS-01	Does the utility have a management information system (MIS) in place for tracking maintenance activities? <i>(Either electronic or good paper files)</i> IF NO, GO TO NEXT SECTION	x		
	Comments:			
MIS-02	Are the MIS records maintained for a period of at least three years?	x		
	Comments:			
MIS-03	Is the MIS able to distinguish activities taken in response to an overflow event?	x		
	Comments:			
MIS-04	Are there written instructions for managing and tracking the following information? (Check all that apply)			
	Complaint work orders	x		
	Schedule work orders	x		
	Customer Service	X		
	Scheduled preventive maintenance	X		
	Scheduled Inspections	X		
	Scheduled system inventory			
	Safety incidents			
	Scheduled monitoring/sampling	X		

	Compliance/overflow tracking	X		
	Equipment/tools tracking			
	Parts inventory			
MIS-05	Do the written instructions for tracking procedures include the following information?			
	Accessing data and information			
	Instructions for using the tracking system			
	Updating the MIS			
	Developing and printing reports			
	Comments:			
Checklist Item		Yes	No	N/A
MIS-06	How often is the management information system updated?			
	Immediately			
	Within one week of the "incident"			
	Monthly			
	Other:			
	Comments:			

Comments:

System Mapping (MAP)

Checklist Item		Yes	No	N/A
MAP-01	Are "as built" plans (record drawings) or maps available for use by field crews in the office and in the field?		X	
	Comments:			

MAP-02	Is there a procedure for field crews to record changes or inaccuracies in the maps and update the mapping system?		x	
	Comments:			
MAP-03	Do the maps show the date the map was drafted and the date of the last revision?	x		
	Comments:			

Comments:

Checklist Item		Yes	No	N/A
MAP-04	Do the sewer line maps include the following?			
	Scale		x	
	North arrow	X		
	Date the map was drafted	X		
	Date of last revision	X		
	Service area boundaries	X		
	Property lines		x	
	Other landmarks (Roads, water bodies, etc.)	X		
	Manhole and other access points	X		
	Location of building laterals	X		
	Street names	X		
	SSOs occurrences/CSOs outfalls		x	
	Flow monitors		x	
	Force mains			
	Pump stations			
	Lined sewers			
	Main, trunk, and interceptor sewers			
	Easement lines and dimensions			
	Pipe material		X	
	Pipe diameter	X		
	Installation date		x	
	Slope		X	
	Manhole rim elevation		X	
	Manhole coordinates		X	
	Manhole invert elevation		X	
	Distance between manholes	x		

	Comments:			
MAP-05	Are the following sewer attributes recorded?			
	Size			
	Shape			
	Invert elevation			
	Material			
	Separate/combined sewer			
	Installation date			
	Comments:			
Checklist Item		Yes	No	N/A
MAP-06	Are the following manhole attributes recorded?			
	Shape		x	
	Type (e.g., precast, cast in place, etc.)		x	
	Depth		x	
	Age		x	
	Material		x	
	Comments:			
MAP-07	Is there a systematic numbering and identification system to identify manholes, sewer lines, pump station, etc.?	x		
	Comments:			

Internal TV Inspection (TVI)

Checklist Item		Yes	No	N/A
TVI-01	Does the utility have a standardization pipeline condition assessment program? If yes, explain		x	
	Comments:			
TVI-02	Is internal TV inspection used to perform condition assessment? IF NO, GO TO NEXT SECTION	x		

	Comments:			
TVI-03	Are there written operation procedures/guidelines for the internal TV inspection program?			
	Comments:			
TVI-04	Do the internal TV record logs include the following?			
	Pipe size, type, length, and joint spacing		x	
	Distance recorded by internal TV		x	
	Results of the internal TV inspection (including a structural rating)		x	
	Internal TV operator name		x	
	Cleanliness of the line		x	
	Location and identification of line being televised by manholes		x	
	Comments:			
TVI-05	Is a rating system used to determine the severity of the defects found during the inspection process?		x	
	Comments:			
TVI-06	Is there a code list used for internal TV inspection reporting?		x	
TVI-07	Approximately what percent of the total defects determined by TV inspection, during the past 5, years were attributed to the following?			
	Debris			
	Debris/Grease			
	Debris/Roots			
	Grease			
	Grease/Roots			
	Intruding Tap			
	Intruding Tap/Roots			
	Surcharged			
	Offset Joint/Grease			
	Roots			
	Roots/Debris			
	Roots/Grease			
	Roots/Grease/Debris			
	Roots/Line Failure			
	Line Failure			

	Sag In Line			
	Sag In Line/Debris			
	Sag In Line/Grease			
	Other:			
	Other:			
	Total Percentage			
	Comments:			
TVI-08	Are main line and lateral repairs checked by internal TV inspection after the repair(s) have been made?		x	
	Comments:			

Sewer Cleaning (CLN)

Checklist Item		Yes	No	NA
CLN-01	Is there a program to identify sewer line segments, with chronic problems, that should be cleaned on a more frequent schedule?		x	
	Comments:			
CLN-02	What is the entire system cleaning frequency? (e.g., every "X" years)	W e e k l y		
	Comments:			
CLN-03	What is the utility's plan for system cleaning (% or frequency in years)?	100 annually		
	Comments:			
CLN-04	What percent of the total cleaning was considered repeat and trouble spot cleaning during the past year?			
	Comments:			
CLN-05	Does the utility have a root control program?		x	
	Comments:			
CLN-06	Does the utility have a fats, oils, and grease (FOG) program?	x		
	Comments: pretreatment department			

CLN-07	What is the average number of stoppages experienced per 100 miles of sewer pipe per year?			
	Comments:			
CLN-08	Has the number of stoppages increased, decreased, or stayed the same over the past 5 years?			
	Comments:			
CLN-09	Are stoppages plotted on maps and correlated with other data such as pipe size and material or location?			
	Comments:			

Comments:

Checklist Item		Yes	No	NA
CLN-10	Do the sewer cleaning records include the following information?			
	Date and time	X		
	Cause of stoppage	X		
	Method of cleaning			
	Location of stoppage or routine cleaning activity	X		
	Identity of cleaning crew			
	Further actions necessary/initiated			
	Comments:			
CLN-11	If sewer cleaning is done by a contractor, are videos taken before and after cleaning?	X		
	Comments:			

Manhole Inspection and Assessment (MAN)

Checklist Item		Yes	No	N/A
MAN-01	Does the utility have a routine manhole inspection and assessment program? IF NO, GO TO MAN-06		X	

	Comments:		
MAN-02	Are the results and observations from the routine manhole inspection recorded?		
	Comments:		
MAN-03	Does the utility have a goal for the number of manholes inspected annually?		
	Comments:		
MAN-04	How many manholes were inspected during the past year?		
	What is the percent of total manholes were inspected during the		
	Comments:		

Comments:

Checklist Item		Yes	No	N/A
MAN-05	Do the records for manholes/pipe inspection include the following?			
	Conditions of the frame and cover	x		
	Evidence of surcharge			
	Offsets or misalignments			
	Atmospheric hazards measurements (especially hydrogen sulfide)			
	Details on the root cause of cracks or breaks in the manhole or pipe including blockages			
	Recording conditions of (corbel, walls, bench, trough, and pipe seals)			
	Presence of corrosion	x		
	If repair is necessary	x		
	Manhole identifying number/location	x		
	Wastewater flow characteristics (flowing freely or backed up)	x		
	Accumulation of grease, debris, or grit	x		
	Presence of infiltration, location, and estimated quantity		x	
	Inflow from manhole covers		x	

	Comments:			
MAN-06	Does the utility have a grouting program?		x	
	Comments:			

Comments:

Pump Stations (PS)

Checklist Item		Yes	No	N/A
PS-01	Are Standard Operating Procedures (SOPs) and Standard Maintenance Procedures (SMPs) used for each pump station?	x		
	Comments:			
PS-02	Are there enough trained personnel to properly inspect and maintain all pump stations?	x		
	Comments:			
PS-03	Is there an emergency operating procedure for each pump station?			
	Comments:			
PS-04	Is there an alarm system to notify personnel of pump station failures and overflow?	x		

	Comments:			
PS-05	Percent of pump stations with backup power sources	10%		
	Comments:			
PS-06	Does the utility use the following methods when loss of power occurs?			
	On-site electrical generators	x		
	Portable electric generators			
	Vacuum trucks to bypass pump station	x		
	Alternate power source			
	Other			
	Comments:			
PS-07	Is there a procedure for manipulating pump operations during wet weather to increase in-line storage of wet weather flows?			
	Comments:			

Comments:

Checklist Item		Yes	No	N/A
PS-08	Are wet well operating levels set to limit pump start/stops?	x		
	Comments:			
PS-09	Are the lead, lag, and backup pumps rotated regularly?		x	
	Comments:			
PS-10	Are operation logs maintained for all pump stations?			
	Comments:			
PS-11	Are the manuals that contain the manufacturers recommended maintenance schedules for all pump station equipment available?			
	Comments:			
PS-12	On average, how often were pump stations inspected during the past year?	100%		

	Comments:			
PS-13	Are records maintained for each inspection?			
	Comments:			
PS-14	Average annual labor hours spent on pump station inspections			
	Comments:			
PS-15	Percent of pump stations with pump capacity redundancy			
	Comments:			
PS-16	Percent of pump stations with dry weather capacity limitations			
	Comments:			
PS-17	Percent of pump stations with wet weather capacity limitations			
	Comments:			
PS-18	Percent of pump stations calibrated annually			
	Comments:			
PS-19	Percent of pump stations with permanent flow meters			
	Comments:			

Capacity Assessment (CA)

Checklist Item		Yes	No	N/A
CA-01	Does the utility have a flow monitoring program?			
	Comments:			
CA-02	Does the utility have a comprehensive capacity assessment and planning program?			
	Comments:			
CA-03	Are flows measured prior to allowing new connections?			
	Comments:			
CA-04	Do you have a tool (hydraulic model, spreadsheet, etc.) for assessing whether adequate capacity exists in the sewer system? IF NO, GO TO CA-06.			

	Comments:			
CA-05	Does your capacity assessment tool produce results consistent with conditions observed in the system?			
	Comments:			
CA-06	What is the ratio of peak wet weather flow to average dry weather flow at the wastewater treatment plant?			
	Comments:			
CA-07	How many permanent flow meters are currently in the system? (Include meters at pump stations and WWTPs)			
	Comments:			
CA-08	How frequently are the flow meters checked?			
	Comments:			
CA-09	Do the flow meter checks include the following?			
	Independent water level			
	Checking the desiccant			
	Velocity reading			
	Cleaning away debris			
	Downloading data			
	Battery condition			
	Comments:			

Checklist Item		Yes	No	N/A
CA-10	Are records maintained for each inspection? IF NO, GO TO CA-12			
	Comments:			
CA-11	Do the flow monitoring records include the following?			
	Descriptive location of flow meter			
	Type of flow meter			
	Frequency of flow meter inspection			
	Frequency of flow meter calibration			
	Comments:			
CA-12	Does the utility maintain any rain gauges?	x		
	Comments:			

CA-13	Does the utility have any wet weather capacity problems?			
	Comments:			
CA-14	Are low points or flood-plain areas monitored during rain events?			
	Comments:			
CA-15	Does the utility have any dry weather capacity problems?		x	
	Comments:			
CA-16	Is flow monitoring used for billing purposes, capacity analysis, and/or inflow and infiltration investigations?	x		
	Comments:			
Comments:				

Tracking SSOs (TRK)

Checklist Item		Yes	No	N/A
TRK-01	How many SSO events have been reported in the past 5 years?			
	Comments:			
TRK-02	What % of SSOs were less than 1,000 gallons in the past 5 years?			
	Comments:			
TRK-03	Does the utility document and report all SSOs regardless of size?	x		

	Comments:			
TRK-04	Does the utility document basement backups?		x	
	Comments:			
TRK-05	Are there areas that experience frequent street flooding?	x		
	Comments:			
TRK-06	What % of SSO discharges were from each of the following in the last 5 years?			
	Manholes	65		
	Lift/Vacuum Systems (Revised term)	10		
	Main and trunk sewers	10		
	Lateral and branch sewers	15		
	Total	100		
	Comments:			
Checklist Item		Yes	No	N/A
TRK-07	What % of SSO discharges were caused by each of the following in the last 5 years?			
	Construction			
	Cause Unknown			
	Debris			
	Debris/Grease	30		
	Debris/Roots			
	Equipment Failure	5		
	Grease	40		
	Sag In Line			
	Intruding Tap			
	Line Failure			
	Manhole/Surcharged	10		
	Offset Joint			
	Roots			
Roots/Debris				

	Roots/Grease	
	Roots/Intruding Tap	
	Roots/Line Failure	
	Surcharged	
	Other(s):	
	Grand Total	

Comments:

Checklist Item		
TRK-07A	What percentage of SSOs were released to:	
	Storm Sewer	
	Arroyo/Ditch/Drain	
	Street/ Parking lot	
	Private Property	
	River/Stream/Lake/Bayou/Ocean	
	Other:	
	Grand Total	
	Comments:	
TRK-07B	For surface water releases, what percent are to areas that could affect:	
	Contact recreation (beaches, swimming areas)	
	Drinking water sources	
	Shellfish growing areas	
	Fishing or spawning areas	
	Comments:	

Checklist Item		Yes	No	N/A
TRK-08	How many chronic SSO locations are in the collection system?			
	Comments:			
TRK-09	Are pipes with chronic SSOs being monitored for sufficient capacity and/or structural condition?			
	Comments:			
TRK-10	Prior to collapse, are structurally deteriorating pipelines being monitored for renewal or replacement?			

	Comments:
--	------------------

Comments:

Overflow Emergency Response (OERP)

	Checklist Item	Yes	No	N/A
OERP-01	Does the utility have a documented OERP available for utility staff to use? IF NO, GO TO OERP-04		x	
	Comments:			
OERP-02	How often is the OERP reviewed and updated? (Annually, Biannually, etc.)			
	Comments:			
OERP-03	Are specific responsibilities detailed in the OERP for personnel who respond to emergencies?			
	Comments:			
OERP-04	Are staff continuously trained to respond to emergencies?			
	Comments:			
OERP-05	Do work crews have immediate access to tools and equipment during emergencies?			
	Comments:			
	Checklist Item	Yes	No	N/A
OERP-06	Does the utility have procedures for notifying state agencies, local health departments, the NPDES authority, the public, and drinking water authorities of significant overflow events?	x		
	Comments:			
OERP-07	Does the procedure include a current list of the names, titles, phone numbers, and responsibilities of all personnel involved?	x		

	Comments:			
OERP-08	Does the utility have a public notification plan?	x		
	Comments:			
OERP-09	Does the utility have procedures to limit public contact with areas affected by SSOs? (can be delegated to another authority)		x	
	Comments:			
OERP-10	Does the utility use containment techniques to protect storm systems?		x	
	Comments:			
OERP-11	Do the overflow records include the following information?			
	Date and time			
	Cause(s)			
	Names of affected receiving water(s)			
	Location			
	How it was stopped			
	Any remediation efforts			
	Estimated flow/volume discharged			
	Duration of overflow			
	Comments:			
OERP-12	Does the utility have signage to keep public from affected area?			
	Comments:			

Smoke & Dye Testing (SDT)

Checklist Item		Yes	No	N/A
SDT-01	Does the utility have a smoke testing program to identify sources of inflow and infiltration?		x	
	Comments:			

SDT-01A	Does the utility have a smoke testing program to identify sources of inflow and infiltration in illegal connectors?		x	
	Comments:			
SDT-01B	Does the utility have a smoke testing program to identify sources of inflow and infiltration in house laterals (private service laterals)?		x	
	Comments:			
SDT-02	Are there written procedures for smoke testing?			N/A
	Comments:			
SDT-03	Is there a documented procedure for isolating line segments?			
	Comments:			
SDT-04	Is there a documented procedure for notifying residents that smoke testing will be conducted in their area?			
	Comments:			

Comments:

	Checklist Item	Yes	No	N/A
SDT-05	What is the guideline for maximum amount of line to be tested at one time? (<i>Feet or Miles</i>)			
	Comments:			
SDT-06	Are there guidelines for the weather conditions under which smoke testing should be conducted?			

	Comments:		
SDT-07	What is the goal for the % of the system smoke tested each year?		
	Comments:		
SDT-08	What % of the system has been smoke tested in the past 5 years?		
	Comments:		
SDT-09	Do the written records contain location, address, and description of the smoking element that produced a positive result?		
	Comments:		
SDT-10	Does the utility have a dye testing program?		
	Comments:		
SDT-11	Are there written procedures for dye testing?		
	Comments:		
SDT-12	Does the utility have a goal for the percent of the system dye tested each year?		
	Comments:		
SDT-13	What percent of the main collection system had been dye tested over the past year?		
	Comments:		
SDT-14	Does the utility share smoke and dye testing equipment with another utility?		
	Comments:		
Comments:			

Hydrogen Sulfide Monitoring and Control (HSMC)

Checklist Item		Yes	No	N/A
HSMC-01	How would you rate the system vulnerability for hydrogen sulfide corrosion?			
	Not a problem			
	Only in a few isolated areas			
	A major problem			

	Comments:			
HSMC-02	Does the utility have a corrosion control program?		x	
	Comments:			
HSMC-03	Does the utility take hydrogen sulfide corrosion into consideration when designing new or replacement sewers?	x		
	Comments:			
HSMC-04	Does the utility have procedures for application of chemicals?			
	Comments:			
HSMC-05	Are the chemical dosages, dates, and locations documented?			
	Comments:			
HSMC-06	Does the utility document where odor is a problem in the system?			
	Comments:			
HSMC-07	Does the utility have a program in place for renewing or replacing severely corroded sewer lines to prevent collapse?		x	
	Comments:			

Comments:

Checklist Item		Yes	No	N/A
HSMC-08	Are the following methods used for hydrogen sulfide control?			
	Aeration			
	Iron Salts			
	Enzymes			
	Activated charcoal canisters			

	Chlorine			
	Sodium hydroxide			
	Hydrogen peroxide			
	Potassium permanganate			
	Biofiltration			
	Other			
	Comments:			
HSMC-09	Does the system contain air relief valves at the high points of the force main system?			
	Comments:			
HSMC-10	How often are the valves maintained and inspected? (Weekly, Monthly, etc.)			
	Comments:			
HSMC-11	Does the utility enforce pretreatment requirements?			
	Comments:			

Comments:

Infrastructure Security

Although outside the scope of a CMOM program, municipal wastewater utilities should also consider security vulnerabilities. To reduce the threat of both intentional and natural disasters, the utility should take steps to implement appropriate countermeasures and develop or update emergency response plans.

Please summarize any program the utility has for infrastructure security.

Comments:

Appendix 2

Review of the ICIS E90 Effluent Violations

NM0020311

ROSWELL, NEW MEXICO

Monitoring Period End Date	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifi er Code	DMR Value
01/31/2022	Oxygen, dissolved [DO]	DAILY MN	mg/L	4.1	<	1.99
01/31/2022	Oxygen, dissolved [DO]	MO AV MN	mg/L	4.1	<	2.41
01/31/2022	Oxygen, dissolved [DO]	DAILY MN	mg/L	4.1	<=	1.99
01/31/2022	Oxygen, dissolved [DO]	MO AV MN	mg/L	4.1	>=	2.41
12/31/2022	Oxygen, dissolved [DO]	DAILY MN	mg/L	4.1	<	2.06
12/31/2022	Oxygen, dissolved [DO]	MO AV MN	mg/L	4.1	=	2.23
12/31/2022	Oxygen, dissolved [DO]	DAILY MN	mg/L	4.1	<=	2.06
12/31/2022	Oxygen, dissolved [DO]	MO AV MN	mg/L	4.1	<=	2.23
01/31/2023	Oxygen, dissolved [DO]	DAILY MN	mg/L	4.1	<=	1.94
01/31/2023	Oxygen, dissolved [DO]	DAILY MN	mg/L	4.1	<=	1.94
03/31/2025	Whole Effluent Toxicity [WET] - C. dubia	MN VALUE	%	90.	=	68.
03/31/2025	Whole Effluent Toxicity [WET] - C. dubia	MN VALUE	%	90.	=	68.
03/31/2025	Whole Effluent Toxicity [WET] - C. dubia	MN VALUE	%	90.	=	68.

Appendix 3

Review of the ICIS E80 Effluent Violations

FE&C NPDES AIR Admin 

Reports

Help

DESPARZA

Logout



Search Permits

Related NPDES Violations

 ADD SINGLE EVENT VIOLATION

List of Violations Related to the Permit

Record Numbers 1 to 23

Violation Type	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Action
Single Event Violation	R013S Dry-weather SSO, no discharge to waters of the U.S., that may endanger health or the environment	R013S	01/04/2024			Delete
Single Event Violation	R011S Wet-weather SSO, no discharge to waters of the U.S., that may endanger health or the environment	R011S	02/11/2024			Delete
Single Event Violation	R011S Wet-weather SSO, no discharge to waters of the U.S., that may endanger health or the environment	R011S	10/19/2024			Delete
Single Event Violation	R010S Wet-weather SSO discharge to waters of the U.S. that may endanger health or the environment	R010S	10/20/2024			Delete
Single Event Violation	R015S Wet-weather SSO, no discharge to waters of the U.S., not permit compliant, no endangerment	R015S	10/27/2024			Delete
Single Event Violation	A0013 Effluent Violations - Failed Toxicity Test	A0013	02/04/2025			Delete
Single Event Violation	A0013 Effluent Violations - Failed Toxicity Test	A0013	02/13/2025			Delete
Single Event Violation	R013S Dry-weather SSO, no discharge to waters of the U.S., that may endanger health or the environment	R013S	04/06/2025			Delete
Single Event Violation	A0013 Effluent Violations - Failed Toxicity Test	A0013	04/15/2025			Delete
Single Event Violation	R013S Dry-weather SSO, no discharge to waters of the U.S., that may endanger health or the environment	R013S	05/08/2025			Delete
Effluent Violation	001 A 00300 Oxygen, dissolved [DO] Effluent Gross Season ID:0 C1	E90	01/31/2022			
Effluent Violation	001 A 00300 Oxygen, dissolved [DO] Effluent Gross Season ID:0 C2	E90	01/31/2022			