

INSPECTION REPORT

|                                                         |                                                                                                                                                                                           |                                         |
|---------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| Inspection Entry Date/Time                              | 08/03/2023 08:59 AM (MT)                                                                                                                                                                  | Announced: No                           |
| Inspection Exit Date/Time                               | 08/03/2023 11:16 AM (MT)                                                                                                                                                                  | Access: Granted                         |
| Weather                                                 |                                                                                                                                                                                           |                                         |
| Media                                                   | Water                                                                                                                                                                                     |                                         |
| Statute(s)/Program(s)                                   | Clean Water Act, NPDES, WWTP                                                                                                                                                              |                                         |
| Type of Inspection                                      | Compliance Evaluation Inspection (CEI)                                                                                                                                                    |                                         |
|                                                         |                                                                                                                                                                                           |                                         |
| Permittee Name                                          | City of Raton                                                                                                                                                                             |                                         |
| Facility or Site Name                                   | City of Raton Water Filtration Facility                                                                                                                                                   |                                         |
| Facility/Site Physical Address                          | 420 Hereford Avenue                                                                                                                                                                       |                                         |
| City, State, Zip Code                                   | Raton, NM 87740                                                                                                                                                                           |                                         |
| County/Borough/Parish                                   |                                                                                                                                                                                           |                                         |
| Facility GPS Coordinates                                | 36.87007, -104.43525                                                                                                                                                                      |                                         |
| Mailing Address<br>(If different)                       |                                                                                                                                                                                           |                                         |
| City, State, Zip Code                                   |                                                                                                                                                                                           |                                         |
|                                                         |                                                                                                                                                                                           |                                         |
| FRS ID                                                  | 110011026889                                                                                                                                                                              |                                         |
| Permit Number(s) (If Applicable)                        | NM0029891                                                                                                                                                                                 |                                         |
| SIC and/or NAICS                                        | 4941                                                                                                                                                                                      |                                         |
|                                                         |                                                                                                                                                                                           |                                         |
| Regulatory Representatives Participating in Inspection: |                                                                                                                                                                                           |                                         |
| Title                                                   | Name                                                                                                                                                                                      | Organization                            |
| Program Manager, Point Source<br>Regulation Section     | Susan A. Lucas Kamat                                                                                                                                                                      | NMED                                    |
|                                                         |                                                                                                                                                                                           |                                         |
| Lead Inspector:                                         |                                                                                                                                                                                           |                                         |
| Kenneth Aubuchon                                        | <b>KENNETH AUBUCHON</b><br> Digitally signed by KENNETH AUBUCHON<br>Date: 2023.11.13 14:34:04 -06'00' |                                         |
|                                                         | EPA REGION 6                                                                                                                                                                              | aubuchon.kenneth@epa.gov (281) 983-2151 |
|                                                         |                                                                                                                                                                                           |                                         |
| Supervisor Review:                                      |                                                                                                                                                                                           |                                         |
| Roberto Bernier                                         | <b>ROBERTO BERNIER</b><br> Digitally signed by ROBERTO BERNIER<br>Date: 2023.11.14 07:07:58 -06'00'   |                                         |
|                                                         | EPA REGION 6                                                                                                                                                                              | bernier.roberto@epa.gov (214) 665-8376  |

**SECTION I – INTRODUCTION****Site Entry and Inspection Objectives**

EPA REGION 6 Lead Inspector, Kenneth Aubuchon, arrived at the City of Raton Water Filtration Facility (the “Site” or “Facility”), located at 420 Hereford Avenue, Raton, NM 87740, at 08:59 AM (MT) on 08/03/2023 for an unannounced inspection. EPA REGION 6 Lead Inspector presented credentials to Anthony Bustos and informed them that this was an EPA REGION 6 inspection to determine compliance as authorized by Clean Water Act (CWA) Section 308 and implementing regulations. This report is based on information supplied by City of Raton Water Filtration Facility representatives, direct observations made by the EPA REGION 6 inspector, records and reports maintained by the permittee and other information including: photographs taken by EPA REGION 6 inspector(s), physical evidence collected by the EPA REGION 6 inspector(s), measurements taken by EPA REGION 6 inspector(s), verbal or written statements made by information supplied by City of Raton Water Filtration Facility representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA REGION 6 inspector(s) by City of Raton Water Filtration Facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of EPA, State, and/or public records may be included in this report.

At the opening meeting, the inspection objectives were discussed. Mr. Bustos explained that the facility has not had a reported discharge since 2001. Additionally, Mr. Bustos explained that in 2018 that the settling basin was dredged with dredged material dried and hauled to local landfill.

**Attendees**

| Organization                      | Attendee Name     | Title                 | Present in Opening Conf. | Present in Closing Conf. |
|-----------------------------------|-------------------|-----------------------|--------------------------|--------------------------|
| EPA REGION 6                      | Kenneth Aubuchon  | Lead Inspector        | Yes                      | Yes                      |
| NMED                              | Susan Lucas Kamat | Program Manager       | Yes                      | Yes                      |
| City of Raton - Raton Water Works | Anthony Bustos    | Lead Operator level 3 | Yes                      | Yes                      |
| City of Raton                     | Terry Sykes       | General Manager       | No                       | Yes                      |

**Facility/Site Description**

EPA REGION 6 lead inspector confirmed the following facility information:

The Raton Water Treatment Plant is a municipal drinking water treatment facility. The plant was built in 1946 and is currently undergoing renovations. The facility is designed for total reuse of its wastewater but maintains an NPDES permit in case an event occurs when they cannot reclaim all the backwash water.

The intake water is received from Lake Maloya and/or the Cimarron River. Recently the Cimarron River has been affected by forest fires and is being used less as a water supply. This facility has the ability to treat up to 4 MGD, with the backwash and filter-to-waste water flows generating a flow of approximately 0.08 MGD. The raw water is treated with coagulation, flocculation, sedimentation, filtration and disinfection. Raw water is fed to a large holding tank. The water is then pumped into the facility where aluminum chloride and a polymer are injected. It

flows through two large basins where the floc grows in size. The water is then fed into rectangular clarifiers where the floc settles out. After clarification, the water flows into filtration units and then is sent out for distribution. Major treatment operations for the WTP have an alarm system and automatic call out system.

Filter backwash sludge is managed by sending flows from the backwash system into two 660,000gallon settling basins below the plant by turning a manual valve. The backwash is currently flushed about four times a year and is expected to be reduced to twice a year after renovations. Water from this pond is pumped back up to the holding tanks after the waste has settled. The backwash flow is metered and a mass balance could be done to help estimate flows out of the pond if it were to overflow. If the pond were to overflow it would breach on the west side, where the slopes of the pond have been armored with rip rap. Stormwater has been diverted around the pond through a culvert.

The sludge is periodically removed from the settling basin and may be further dewatered in sludge drying beds prior to transfer of the alum sludge solid to a city owned land-application site.

**Photo(s)**

1. [P1011066.JPG](#)

**Facility/Site Information**

|                                                                                                           |                                                                                                                                        |
|-----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| <b>Responsible official</b>                                                                               | Terry Sykes                                                                                                                            |
| <b>Have any bypasses or overflows happened at the plant or in the collection system in the last year?</b> | Yes, at the time of the inspection the cleaning of sediments from raw water tank was being discharged bypassing the permitted outfall. |
| <b>Outfalls: (and do the numbers, locations, and receiving waters match the permit?)</b>                  | Outfall 001                                                                                                                            |
| <b>WWTP Design Capacity &amp; Average Daily Flow</b>                                                      | No Discharge since 2001                                                                                                                |

**Location(s)**

| Location/Area/Sub-area  | Description                                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1. Intake Waters</b> | The Raton Water Treatment Plant is a municipal drinking water treatment facility. The plant was built in 1946 and has had renovations and upgrades. The facility is designed for total reuse of its wastewater but maintains the permit in case an event occurs when they cannot reclaim all the backwash water last discharge was in 2001. The intake water is received from Lake Maloya and/or the Cimarron River. |

|                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>2. Treatment System</b> | This facility has the ability to treat up to 4 MGD, with the backwash and filter-to-waste water flows generating a flow of approximately 0.08 MGD. The raw water is treated with coagulation, flocculation, sedimentation, filtration and disinfection. Raw water is fed to a large holding tank. The water is then pumped into the facility where aluminum chloride and a polymer are injected. It flows through two large basins where the floc grows in size. The water is then fed into rectangular clarifiers where the floc settles out. After clarification, the water flows into filtration units and then is sent out for distribution. Major treatment operations for the WTP have an alarm system and automatic call out system. Filter backwash sludge is managed by sending flows from the backwash system into two 660,000-gallon settling basins below the plant by turning a manual valve. Water from this pond is pumped back up to the holding tanks after the waste has settled. |
| Raw Water Tank             | Intake water is maintained in the Raw Water Tank. The tank has the capacity of 2.5 million gallons.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Settling Basin             | The settling basin consists of (2) 660,000-gallon earthen basins totaling (approx.) 1.33 million gallons of capacity. Water is recycled to the drinking water treatment system for reuse.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>3. Outfalls</b>         | The backwash flow is metered, and a mass balance could be done to help estimate flows out of the pond if it were to overflow. If the pond were to overflow it would breach on the west side, where the slopes of the pond have been armored with rip rap. Stormwater has been diverted around the pond through a culvert. The sludge is periodically removed from the settling basin and may be further dewatered in sludge drying beds prior to transfer of the alum sludge solid to a city owned land-application site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

**SECTION II – OBSERVATIONS**

| <b>Location:</b> 2. Treatment System/Settling Basin                                                                                                                                                                              |                         |                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------|
| <b>Observation #:</b> KA1-OB-002                                                                                                                                                                                                 | <b>Date:</b> 08/03/2023 | <b>Weather:</b> |
| The sludge is periodically removed from the settling basin and may be further dewatered in sludge drying beds prior to transfer of the alum sludge solid to a city owned land-application site. Sludge was last removed in 2018. |                         |                 |

| <b>Location:</b> 2. Treatment System/Raw Water Tank                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                         |                 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|-----------------|
| <b>Observation #:</b> KA1-OB-004                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Date:</b> 08/03/2023 | <b>Weather:</b> |
| At the time of the inspection, the 2.5million gallon Raw Water Tank was being cleaned and repaired. The sediment that was being removed from the tank was being discharged directly to an ephemeral arroyo, thence to Raton Creek, thence to Chicorica Creek, thence to the Canadian River in segment 20.6.4.305 of the Canadian River Basin according to the State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 NMAC bypassing the permitted outfall. The discharge consisted of heavy solids that were vacuumed out of the Raw Water Tank. |                         |                 |

**Document(s)**

1. Raton Raw water inspection report (002).docx

**Photo(s)**

1. [P1011075.JPG](#)
2. [P1011076.JPG](#)
3. [P1011077.JPG](#)
4. [P1011078.JPG](#)
5. [P1011079.JPG](#)
6. [P1011080.JPG](#)
7. [P1011081.JPG](#)
8. [P1011082.JPG](#)
9. [P1011083.JPG](#)
10. [P1011084.JPG](#)
11. [P1011085.JPG](#)
12. [P1011086.JPG](#)

**Location: 2. Treatment System/Settling Basin****Observation #:** KA1-OB-005**Date:** 08/03/2023**Weather:**

At the time of the inspection, large trees were growing and embedded in the overflow / down gradient of the settling basin. The tree roots weaken the berm and may lead to bypass paths of the outfall.

**Photo(s)**

1. [P1011072.JPG](#)
2. [P1011073.JPG](#)

**Location: 3. Outfalls****Observation #:** KA1-OB-006**Date:** 08/03/2023**Weather:**

Facility had a prepared sampling cooler that contained all sample bottles necessary if a discharge would occur.

**Photo(s)**

1. [P1011067.JPG](#)

**SECTION III – RECORDS REVIEW****SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS**

No sampling was conducted.

**SECTION V - AREA OF CONCERN**

Area(s) of Concern may not be in sequential order.

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

| AOC Reference #: KA1-OB-004                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Location: 2. Treatment System/Raw Water Tank |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| <b>Regulation and/or Permit Requirement</b><br><br>NPDES Permit NM0029891 Part I. D. Overflow Reporting                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                              |
| <p>The permittee shall report all overflows with the Discharge Monitoring Report submittal. These reports shall be summarized and reported in tabular format. The summaries shall include: the date, time, duration, location, estimated volume, and cause of the overflow; observed environmental impacts from the overflow; actions taken to address the overflow; and ultimate discharge location if not contained (e.g., storm sewer system, ditch, tributary).</p> <p>Overflows that endanger health or the environment shall be orally reported to EPA at (214) 665-6595, and NMED Surface Water Quality Bureau at (505) 827-0187, within 24 hours from the time the permittee becomes aware of the circumstance. A written report of overflows that endanger health or the environment shall be provided to EPA and the NMED Surface Water Quality Bureau within 5 days of the time the permittee becomes aware of the circumstance.</p> |                                              |
| <b>AOC:</b><br><br>At the time of the inspection, the 2.5million-gallon Raw Water Tank was being cleaned and repaired. The sediment that was being removed from the tank was being discharged directly to an ephemeral arroyo, thence to Raton Creek, thence to Chicorica Creek, thence to the Canadian River in segment 20.6.4.305 of the Canadian River Basin according to the State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 NMAC bypassing the permitted outfall. The discharge consisted of heavy solids that were vacuumed out of the Raw Water Tank.                                                                                                                                                                                                                                                                                                                                                 |                                              |
| <b>Additional Notes:</b> Refer to the Observation Section and Photo log for additional information regarding this AOC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                              |

| AOC Reference #: KA1-OB-005                                                                                                                                                                                                | Location: 2. Treatment System/Settling Basin |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| <b>Regulation and/or Permit Requirement</b><br><br>40 CFR 122.41(e)                                                                                                                                                        |                                              |
| 122.41(e) - (e) Proper operation and maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control...                                                    |                                              |
| <b>AOC:</b><br><br>At the time of the inspection, large trees were growing and embedded in the overflow / down gradient of the settling basin. The tree roots weaken the berm and may lead to bypass paths of the outfall. |                                              |
| <b>Additional Notes:</b> Refer to the Observation Section and Photo log for additional information regarding this AOC.                                                                                                     |                                              |

## **SECTION VI – CLOSING CONFERENCE AND FOLLOW UP**

### **Closing Conference**

The EPA REGION 6 Lead Inspector held a closing conference with Facility personnel at 11:16 AM (MT) on 08/03/2023 for the inspection. During the closing conference, EPA REGION 6 Lead Inspector discussed the observations and Area(s) of Concern identified during the inspection. Observations and Area(s) of Concern have not yet been evaluated for a formal compliance determination.

### **Follow Up**

No follow up was required after exiting the facility on 08/03/2023.

### **Communication Log**

No additional information received by EPA REGION 6 after exiting the Facility on 08/03/2023.

## **SECTION VII – LIST OF APPENDICES**

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



|                        |        |        |                                |
|------------------------|--------|--------|--------------------------------|
| Main Entrance          |        |        | P1011066.JPG                   |
| 08/03/2023             | No CBI | No PII | Photographer: Kenneth AuBuchon |
| Main Building entrance |        |        |                                |



|                                                                          |        |        |                                |
|--------------------------------------------------------------------------|--------|--------|--------------------------------|
| Sampling Cooler                                                          |        |        | P1011067.JPG                   |
| 08/03/2023                                                               | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 3. Outfalls                                                              |        |        |                                |
| Cooler containing necessary sampling bottles if a discharge would occur. |        |        |                                |



|                                                                 |        |        |                                |
|-----------------------------------------------------------------|--------|--------|--------------------------------|
| Equalization Tank                                               |        |        | P1011068.JPG                   |
| 08/03/2023                                                      | No CBI | No PII | Photographer: Kenneth AuBuchon |
| Recirculation and equalization tank before the settling basins. |        |        |                                |



|                                                                                            |        |        |                                |
|--------------------------------------------------------------------------------------------|--------|--------|--------------------------------|
| Discharge to Settling Basins                                                               |        |        | P1011069.JPG                   |
| 08/03/2023                                                                                 | No CBI | No PII | Photographer: Kenneth AuBuchon |
| This is the discharge from the equalization and recirculation tank to the settling basins. |        |        |                                |



|                                                           |        |        |                                |
|-----------------------------------------------------------|--------|--------|--------------------------------|
| Basin Levies                                              |        |        | P1011072.JPG                   |
| 08/03/2023                                                | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Settling Basin                        |        |        |                                |
| Heavy tree growth on the downside of the settling basins. |        |        |                                |



|                                                                 |        |        |                                |
|-----------------------------------------------------------------|--------|--------|--------------------------------|
| Basin Levees                                                    |        |        | P1011073.JPG                   |
| 08/03/2023                                                      | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Settling Basin                              |        |        |                                |
| Heavy tree growth on the downside of the settling basins levee. |        |        |                                |



|                                                                                                            |        |        |                                |
|------------------------------------------------------------------------------------------------------------|--------|--------|--------------------------------|
| Raw Water Bypass                                                                                           |        |        | P1011075.JPG                   |
| 08/03/2023                                                                                                 | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Raw Water Tank                                                                         |        |        |                                |
| Discharge from the raw water cleaning that was bypassing the settling basins permitted discharge location. |        |        |                                |



|                                                                                                                 |        |        |                                |
|-----------------------------------------------------------------------------------------------------------------|--------|--------|--------------------------------|
| Discharge from Raw Water tank cleaning                                                                          |        |        | P1011076.JPG                   |
| 08/03/2023                                                                                                      | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Raw Water Tank                                                                              |        |        |                                |
| Discharge from the raw water tank cleaning that was bypassing the settling basins permitted discharge location. |        |        |                                |



|                                                                                                                 |        |        |                                |
|-----------------------------------------------------------------------------------------------------------------|--------|--------|--------------------------------|
| Raw Water Tank Cleaning Discharge                                                                               |        |        | P1011077.JPG                   |
| 08/03/2023                                                                                                      | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Raw Water Tank                                                                              |        |        |                                |
| Discharge from the raw water tank cleaning that was bypassing the settling basins permitted discharge location. |        |        |                                |



|                                                                                                                 |        |        |                                |
|-----------------------------------------------------------------------------------------------------------------|--------|--------|--------------------------------|
| Raw Water Tank Cleaning Discharge/Bypass                                                                        |        |        | P1011078.JPG                   |
| 08/03/2023                                                                                                      | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Raw Water Tank                                                                              |        |        |                                |
| Discharge from the raw water tank cleaning that was bypassing the settling basins permitted discharge location. |        |        |                                |



|                                                                                                                 |        |        |                                |
|-----------------------------------------------------------------------------------------------------------------|--------|--------|--------------------------------|
| Raw Water Cleaning Discharge / Bypass                                                                           |        |        | P1011079.JPG                   |
| 08/03/2023                                                                                                      | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Raw Water Tank                                                                              |        |        |                                |
| Discharge from the raw water tank cleaning that was bypassing the settling basins permitted discharge location. |        |        |                                |



|                                                                                                                 |        |        |                                |
|-----------------------------------------------------------------------------------------------------------------|--------|--------|--------------------------------|
| Raw Water Tank Cleaning Discharge/Bypass                                                                        |        |        | P1011080.JPG                   |
| 08/03/2023                                                                                                      | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Raw Water Tank                                                                              |        |        |                                |
| Discharge from the raw water tank cleaning that was bypassing the settling basins permitted discharge location. |        |        |                                |



|                                                                                                                 |        |        |                                |
|-----------------------------------------------------------------------------------------------------------------|--------|--------|--------------------------------|
| Raw Water Cleaning Discharge / Bypass                                                                           |        |        | P1011081.JPG                   |
| 08/03/2023                                                                                                      | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Raw Water Tank                                                                              |        |        |                                |
| Discharge from the raw water tank cleaning that was bypassing the settling basins permitted discharge location. |        |        |                                |



|                                                                         |        |        |                                |
|-------------------------------------------------------------------------|--------|--------|--------------------------------|
| Tank Cleaning Company                                                   |        |        | P1011082.JPG                   |
| 08/03/2023                                                              | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Raw Water Tank                                      |        |        |                                |
| Cleaning company that was discharging from the raw water tank cleaning. |        |        |                                |



|                                                                                                                 |        |        |                                |
|-----------------------------------------------------------------------------------------------------------------|--------|--------|--------------------------------|
| Discharge / Bypass Lines                                                                                        |        |        | P1011083.JPG                   |
| 08/03/2023                                                                                                      | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Raw Water Tank                                                                              |        |        |                                |
| Discharge from the raw water tank cleaning that was bypassing the settling basins permitted discharge location. |        |        |                                |



|                                                                                                                 |        |        |                                |
|-----------------------------------------------------------------------------------------------------------------|--------|--------|--------------------------------|
| Discharge / Bypass Lines                                                                                        |        |        | P1011084.JPG                   |
| 08/03/2023                                                                                                      | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Raw Water Tank                                                                              |        |        |                                |
| Discharge from the raw water tank cleaning that was bypassing the settling basins permitted discharge location. |        |        |                                |



|                                                                                                                 |        |        |                                |
|-----------------------------------------------------------------------------------------------------------------|--------|--------|--------------------------------|
| Discharge / Bypass Lines                                                                                        |        |        | P1011085.JPG                   |
| 08/03/2023                                                                                                      | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Raw Water Tank                                                                              |        |        |                                |
| Discharge from the raw water tank cleaning that was bypassing the settling basins permitted discharge location. |        |        |                                |



|                                                                                                            |        |        |                                |
|------------------------------------------------------------------------------------------------------------|--------|--------|--------------------------------|
| Sediment from Discharge                                                                                    |        |        | P1011086.JPG                   |
| 08/03/2023                                                                                                 | No CBI | No PII | Photographer: Kenneth AuBuchon |
| 2. Treatment System/Raw Water Tank                                                                         |        |        |                                |
| Discharge from the raw water cleaning that was bypassing the settling basins permitted discharge location. |        |        |                                |

**APPENDIX 2: DOCUMENT LOG**

| Document Type                | Document Name                                | Contains<br>CBI | Contains<br>PII | Uploaded<br>By   | Date<br>Received |
|------------------------------|----------------------------------------------|-----------------|-----------------|------------------|------------------|
| Permit Fact Sheet            | nm0029891_fact_sheet_april_05_2021_0.pdf     | No              | No              | Kenneth Aubuchon | 08/16/2023       |
| Permit                       | nm0029891_draft_permit_april_5_2021_2.pdf    | No              | No              | Kenneth Aubuchon | 08/16/2023       |
| Inspection Report – Previous | NM0029891-20190820.pdf                       | No              | No              | Kenneth Aubuchon | 08/16/2023       |
| Other - Scope of Work Report | Raton Raw water inspection report (002).docx | No              | No              | Kenneth Aubuchon | 11/08/2023       |