

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	05/05/2025	
Media Program:	Water	
Regulatory Program(s)	CWA	
Company Name:	City of Las Cruces	
Facility Name:	Jacob Hands Memorial WWTF	
Facility Physical Location:	2851 West Amador	
(city, state, zip code)	Las Cruces, New Mexico 88005	
Mailing address:	680 N. Motel Blvd.	
(city, state, zip code)	Las Cruces, New Mexico 88007	
County/Parish:	Dona Ana	
Facility Phone Number	(575) 528-3256	
Facility Contact:	Joaquin Murillo	Deputy Director Wastewater/Utilities
	jmurillo@lascruces.gov	
FRS Number:	110039926774	
Identification/Permit Number:	NM0023311	
Media Identifier Number:	N/A	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Joaquin Murillo	City of Las Cruces	Deputy Director Wastewater/Utilities
David Esparza	EPA-R6/ECDWM	Environmental Engineer
EPA Lead Inspector Signature/Date		
	David Esparza	Date
Supervisor Signature/Date		
	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (EPA) Region 6 inspector David Esparza, PE, arrived at the City of Las Cruces Public Works Department at approximately 1:00 PM on May 5, 2025, for an unannounced inspection. I presented my credentials to Mr. Joaquin Murillo, City of Las Cruces' Deputy Director Wastewater/Utilities and informed him that this was an EPA inspection to determine the facility's compliance under the Clean Water Act (CWA) and the requirements 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 Las Cruces' representatives, observations made by the EPA inspector, records and reports maintained by the permittee (Las Cruces), and the EPA. Before leaving the facility on May 5, 2025, an exit briefing was held with Mr. Murillo, 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).

FACILITY DESCRIPTION

The City of Las Cruces-Jacob Hands Memorial Wastewater Treatment Facility (Jacob Hands) (WWTF) is classified as a major discharger with a design capacity of 13.5 million gallons per day (MGD) and an average daily flow of 9.7 MGD, serving a population of approximately 115,000. The facility is located at 2851 W. Amador Avenue, Las Cruces, Dona Ana County, New Mexico (denoted in Aerial Image #1 below).

The WWTF treatment process is comprised of a gravity collection system, and 16 lift/pump stations (Identified in Table 1 below). The influent traverses through a mechanical bar screen where large debris is removed, thence to the grit washer and the aerated grit remover where further debris is removed from the influent. Biofilters were installed during the 2009 WWTF expansion for odor control. Influent then flows to the equalization basin, thence to the primary clarifiers. There are two primary clarifiers that rotate operational status every six months. From the primary clarifiers flow enters the roughing filters. There are two aeration basins after the roughing filters, the east and west basins. Final clarifiers are used prior to chlorination and dechlorination. Effluent is then released through a 24" Parshall flume to an unnamed ditch, thence the Rio Grande.

The CDM (f.k.a. Camp Dresser and McKee) Master Plan cites the utility department also treats wastewater from areas receiving water service from Doña Ana Mutual Domestic Water Consumers Association (MDWCA), Moongate Water Company, Jornada Water Company, the Town of Mesilla, San Pablo, and New Mexico State University (NMSU). The Master Plan further states the existing collection system is comprised of approximately 500-miles of pipes, inclusive of 39-miles of interceptors with a diameter of 15-inches or greater. Except for the West Mesa Industrial Park wastewater system, these interceptors receive flow from throughout the service area and convey the flow to Jacob Hands. It should be noted the West Mesa Industrial Park Wastewater Treatment Facility (WMIP) is a separate system that receives flows from West Mesa Industrial Park tenants through one central interceptor.

The Jacob Hands Waste Activated Sludge (WAS), a by-product of wastewater treatment, is moved to a gravity thickener to concentrate the solids and reduce the volume of sludge, thence to the primary and

secondary digesters. Bio-solids from the East Mesa WWTF (NM0030872) are also sent to the digester at Jacob Hands. Produced digester gases are sent to the co-generation (CoGen) System. The Jacob Hands processed bio-solid waste is small quantity distributed to the public with excess transported to the West Mesa WWTF for composting.



Aerial Image #1: Overall view of the City of Las Cruces'- Jacob Hands Wastewater Treatment Plant. Aerial from Google Earth maps.

Table 1: City of Las Cruces-Jacob Hands Memorial Lift Stations

Lift Station Number	Name	Street Address
1	Boutz.	1716 W. Boutz Road
2	Brown	1811 Brown Road
3	Craver	40125 Willow Glen
4	Chisolm	379 E Franey
5	Dove Crossing	3141 Karen Drive
6	Frenger	1801 East Park
7	Inspiration	7805 Holman Road
8	Mesilla Park	201 W Union
9	Sanctuary	4105 W Hwy 28
10	Sand Hill	999 Parkhill
11	Shadow Run	5000 Las Alturas
12	Tortugas	291 E Tortugas Drive
13	University	520 W University
14	Holman	14000 Holman Road
15	Metro Verde	4501 Arroyo

Lift Station Number	Name	Street Address
16	Jacob Hands	2851 W Amador

Currently there are eight (8) established Industrial Users (IU) that currently discharge their effluent into the City's WWTF (identified in **Table 2** below).

Table 2: City of Las Cruces-Jacob Hands Industrial Users

Name	Type of Discharge	SIC #
NASA	Industrial Service	9661
New Mexico State University	Education-school	8221
Memorial Medical Center	Hospital	8062
Southern Root Nuts Company	Pecan processing	5159
Olam	Chile processing	2099
American Linen	Commercial Laundry	7211
Johnny's Septic Tank Company	Dewatered Fats, Oils, and Grease	4953
7 Diamond	Dewatered Septic Tank Sludge	562219

Additionally, Las Cruces has written policies and procedures to address land development and specific ordinances regarding the operation of their NPDES permitted facility.

Section II - OBSERVATIONS

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

- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment: **General Information** (page 2)- indicates an average daily flow of 9.7 MGD.
- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment: **Collection System Information** (page 3)- indicates 16 lift or pump station (identified above), and approximately 500-miles of gravity sewer lines. The CDM Master Plan indicates that approximately one-third (1/3) of the total piping, equate to or are greater than 10-inches in diameter, are less than 20-years old and that greater than three-fourths (3/4) are less than 30-years old. The Plan further states most of the piping is constructed of vitrified clay pipe (VCP) and polyvinyl chloride pipe (PVC) with the VCP being more common in sewers with diameters less than 15 inches in diameter. Other pipeline materials in this system include cast iron, ductile iron, and reinforced concrete.
- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment: **Engineering Design (ED)** (page 5)- indicates their engineering group involves staff for any comments or concerns with design, surveys are completed prior to construction and taken into consideration during design and planning, and television camera reports are available for all new installation of gravity sewer lines. Additionally, the city is currently updating the locate, (i.e., as-builts) field reports information within the Wastewater line maintenance group (**§ED-03, §ED-06, §ED-07 and §ED-08**).

- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment: **Satellite Communities and Sewer Use Ordinance (SUO)** (page 6)- indicates the utility department also treats wastewater from areas receiving water service from Doña Ana Mutual Domestic Water Consumers Association (MDWCA), Moongate Water Company, Jornada Water Company, the Town of Mesilla, San Pablo, and New Mexico State University (NMSU) (§SUO-01).
- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment: **Organizational Structure (OC)** (page 8)- indicates 28% of the staff positions are currently vacant (§OC-04) and the city is not offering co-op positions now. This number is including new and approved positions currently advertised for recruitment and 5% of the utility work is contracted out (§OC-06).
- A review of the City of Las Cruces-Jacob Hands completed Self-Assessment: **Internal Communications (IC)** (page 9) indicates the utility does not regularly communicate/coordinate with other municipal departments? (§IC-06).
- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment: **Budgeting (BUD)** (page 10)- indicates approximately 8% of the utility 's overall budget is allocated to maintenance of the collection system (§BUD-06).
- A review of the City of Las Cruces-Jacob Hands completed Self-Assessment: **Training (TR)** (page 12) indicates the utility does not have a formal job knowledge, skills, and abilities (KSA) training program (§TR-01), but does have training goals for supervisors and non-supervisors that must be met annually (§TR-04).
- A review of the City of Las Cruces-Jacob Hands 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), corrective repair work orders are not backlogged more than six months (§ESM-06), and collection system personnel do not coordinate with state, county, and local personnel on repairs, before the street is paved (§ESM-06).
- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment: **Equipment Parts Inventory (EPI)** (page 19) indicates the utility does not have a parts standardization policy in place (§EPI-03).
- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment: **Management Information System (MIS)** (page 19 and page 20) indicates the utility is not able to distinguish activities taken in response to an overflow event (§MIS-03), there are not written instructions for managing and tracking the complaint work orders, scheduled system inventory, or parts inventory (§MIS-04). Additionally, the utility does not have written instructions for tracking procedures pertaining to the following: accessing data and information, instructions for using the tracking system, updating the MIS, or developing and printing reports, though it also states work orders/maintenance records/dates/material used/complaint work orders are maintained by our MIS group and is updated regularly (§MIS-05).

- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment: **System Mapping (MAP)** (page 21 and page 22) indicates the sewer line maps do not include SSOs occurrences/CSOs outfalls (**\$MAP-04**), attributes related to invert elevations, separate/combined sewer or installation dates (**\$MAP-05**). **Note:** the city does not have a combined sewer. Additionally, the System Mapping does not record the following manhole attributes shape, type (e.g., precast, cast in place, etc.) or age (**\$MAP-06**).
- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment: **Internal TV Inspection (TVI)** (page 23) indicates there are not written operation procedures/guidelines for the internal TV inspection program (**\$TVI-03**).
- A review of the City of Las Cruces-Jacob Hands 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 every 3-years. It further states the city does not have a root control program (**\$CLN-05**), and stoppages are not plotted on maps and correlated with other data such as pipe size and material or location (**\$CLN-09**).
- A review of the City of Las Cruces-Jacob Hands 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**) or a grouting program (**\$MAN-06**).
- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment: **Pump Stations (PS)** (page 28 and page 29) indicates the city does not have Standard Operating Procedures (SOPs) and Standard Maintenance Procedures (SMPs) used for each pump station (**\$PS-01**), an emergency operating procedure for each pump station (**\$PS-03**), only 50% 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 Las Cruces-Jacob Hands completed CMOM Self-Assessment: **Capacity Assessment (CA)** (page 30) indicates that the city maintains some flow metering in specific locations, for specific functions and are calibrated on a routine basis, but flow meter checks do not include the following independent water level, a check of the desiccant, downloading data or a battery condition (**\$CA-09**). Additionally, the CMOM indicates the flow monitoring records do not include the following: location description, flow meter type, or how often the flow meter is inspected or calibrated (**\$CA-11**).
- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment: **Tracking SSOs (TRK)** (page 32 and page 33) indicates the city, has reported one (1) SSO event in the past 5 years (**\$TRK-01**) and 100% of the reported SSOs was less than 1,000 gallons (**\$TRK-02**). Additionally, the city indicates the last overflow resulted from a Digester overflow (**\$TRK-06**).
- A review of the City of Las Cruces-Jacob Hands 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), specific responsibilities for personnel who respond to emergencies are not detailed (§OERP-03), staff are not continuously trained to respond to emergencies (§OERP-04) and a public notification plan does not exist (§OERP-08).

- A review of the City of Las Cruces-Jacob Hands 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), a smoke testing program to identify sources of inflow and infiltration in house laterals (private service laterals (§SDT-01B), written procedures for smoke testing (§SDT-02), a documented procedure for isolating line segments (§SDT-03), or a documented procedure for notifying residents that smoke testing will be conducted in their area (§SDT-04).

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/RECOMENDATIONS

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

- A review of the City of Las Cruces-Jacob Hands completed CMOM Self-Assessment indicates the city, has reported one (1) SSO event in the past 5 years and 100% of the reported SSOs was less than 1,000 gallons. Additionally, the city indicates the last overflow resulted from a Digester overflow.
- 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.

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 *Escherichia coli* (*E. coli*), Total Suspended Solids (TSS), 5-day Biological Oxygen Demand (BOD₅), Polychlorinated biphenyls and Whole Effluent Toxicity (WET) (Appendix 2 ICIS E90 Effluent Violations). **Note:** Administrative Order (AO) (Docket # CWA-06-2022-1710) was issued on March 31, 2022, regarding failure to meet permit effluent limitations and was closed on March 1, 2024.

Section IV – FOLLOW UP

The following information and/or clarification was received by EPA after exiting on May 5, 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 1

City of Las Cruces-Jacob Hands
Capacity Management Operations
And
Maintenance (CMOM) Self-Assessment

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

Compiled By:

Name: ____Joaquin Murillo_____

Title: Jacob Hands Wastewater Treatment Facility Permit #0023311

Date: ____May 20, 2025_____

Staffing list and Organization chart: Attach separate document as needed

Please see attachment:

General Information

Service area		Service population	115,000
	SQ. MILES		PEOPLE
Annual precipitation	6.28 inches*		
	NUMBER		

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

# of Treatment Facilities	1	WWTP design capacity	13.5
	NUMBER		MGD
Average Daily Flow	9.7	Average dry weather flow	9.7
	MGD		MGD
Manholes	Please see attachmen	Number of air vacuum relief valves	0
	NUMBER		NUMBER

Service Area Characteristics

Residential		Commercial	
Industrial		Institutional	
Multi-Family		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:

--	--

What percent of sewer system is served by combined sewers (i.e., sanitary sewage and storm water in the same pipe)?	0%
	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	522	16	16	0		
	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						
	PERCENT	NUMBER	PERCENT	NUMBER	PERCENT	PERCENT
Number of Inverted siphons	12					
	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:

Please see attachment for conveyance & Pumping

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)			
	PERCENT	PERCENT	PERCENT
Vitrified Clay Pipe			
	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:

Percentage not available at this time.

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: Yes. Our engineering group involves staff for any comments or concerns with design.			
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?			
	Comments: Surveys are performed before construction and taken into consideration during design and planning.			
ED-07	Are new gravity sewers checked using closed circuit TV inspection?	x		
	Comments: T.V. camera reports are available for all new installation of gravity sewer lines.			
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: We try to standardize wherever possible		
Comments: ED-08: We are currently updating our locate field reports information within the Wastewater line maintenance group.			

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: The City of Las Cruces receives flow from the Town of Mesilla, and a section of Dona Ana			
SUO-02 What is the total area from satellite communities that contribute flow to the collection system? (<i>Acres or square miles</i>)	Comments: Total Area in acres or square miles not available at this time.		
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?	x		
Comments:			
SUO-05 Do the agreements have a date of termination and allow for renewal under different terms?		x	
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: see attachment			
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)			
	Defects in service laterals located on private property			

	Sump pumps, air conditioner connections			
	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: See attachments			
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?	28%		
	Comments: We are not offering co op positions at the moment. This number is including new and approved positions currently advertised for recruitment.			
OC-05	On average how long do positions remain vacant? (<i>months</i>)	6		

	Comments:	
OC-06	What percent of utility work is contracted out?	5%
	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.)			
	Comments: Meetings are held monthly			
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:			

IC-05	How often are performance reviews conducted? (e.g. Semi-annually, Annually, etc.)		
	Comments: Performance reviews are conducted semi-annually		
IC-06	Does the utility regularly communicate/coordinate with other municipal departments?		x
	Comments:		

Comments:

Budgeting (BUD)

	Checklist Item	Yes	No	N/A
BUD-01	What is the average annual fee for residential users?			
	Comments: \$ 2 8 0			
BUD-02	How often are user charges evaluated and adjusted? (e.g. annually, biannually. etc.)			
	Comments: user charges are evaluated annually			
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? About 8% of WW utility budget			

	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? 19,687,415		
	Comments:		

Comments:

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

	Comments:		
BUD-11	Does the utility have a budgeted program for the replacement of over-capacity pipes?		x
	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: The utility has training goals for supervisors and non-supervisors that must be met annually.			
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		x	
	Pipe repair	x		
	Bursting / CIPP		x	
	Public relations	x		
	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?	x		
	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	x		
	Drills	x		
	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			
	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?	X		
	Comments:			
SAF-02	How often are safety procedures reviewed and revised? (Annually, quarterly, etc.)			
	Comments: A N N U A L L Y			
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?	MONTHLY		
	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: MONITORED BY SAFETY TEAM			

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	X		
	Fire extinguishers	X		
	Equipment to enter manholes	X		
	Portable crane/hoist	X		
	Atmospheric testing equipment and gas detectors	X		
	Oxygen sensors	X		
	H2S Monitors	X		
	Full body harness	X		
	Protective clothing	X		
	Traffic/public access control equipment	X		
	5-minute escape breathing devices	X		
	Life preservers for lagoons			x
	Life preservers at activated sludge plants	X		
	Fiberglass or wooden ladders for electrical work	X		
	Respirators and/or self-contained breathing apparatus	X		
	Methane gas or optical vector (OVA) analyzer		X	
	Lower explosion limit (LEL) metering	X		
	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	x		
	Comments:			
CS-02	Does the customer service program include giving formal presentations on the wastewater field to the following?			
	Schools and universities	x		
	Community gatherings	x		
	Local officials	x		

	Businesses	x		
	Media	x		
	Citizens	x		
	Building Inspector(s)	x		
	Public utility officials	x		
	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			
	None			
	Comments:			
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	x		
	Feedback to customer			x
Comments:				
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?			
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		
	Comments:			
ESM-03	Are dated tags used to show out-of-service equipment?	x		
	Comments:			
ESM-04	Is there an established system for prioritizing equipment maintenance needs?		x	
	Comments:			
ESM-05	What percent of repair funds are spent on emergency repairs?			
	Comments: N / A			
ESM-06	Are corrective repair work orders backlogged more than six months?		x	
	Comments:			
ESM-07	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	v		
	Customer Service	v		
	Scheduled preventive maintenance	v		
	Scheduled Inspections	v		
	Scheduled system inventory		x	
	Safety incidents	v		
	Scheduled monitoring/sampling	v		
	Compliance/overflow tracking	v		
	Equipment/tools tracking	v		
	Parts inventory		x	
MIS-05	Do the written instructions for tracking procedures include the following information?			
	Accessing data and information		x	
	Instructions for using the tracking system		x	
	Updating the MIS		x	
	Developing and printing reports		x	
	Comments: Developing and printing reports.			
Checklist Item		Yes	No	N/A
MIS-06	How often is the management information system updated?			

	Immediately			x
	Within one week of the "incident"			x
	Monthly			x
	Other:			x
Comments: The system we use to track work orders/maintenance records/dates/material used/complaint work orders is maintained by our MIS group and is updated regularly.				

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	x		
	Pump stations	x		
	Lined sewers	x		
	Main, trunk, and interceptor sewers	x		
	Easement lines and dimensions	x		
	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	x		
	Shape			x
	Invert elevation		x	
	Material	x		
	Separate/combined sewer		x	
	Installation date		x	
	Comments: We do not have a combined sewer within the City of Las Cruces.			

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: Our Wastewater Line Maintenance does regular t.v. inspections to access the condition of lines.			
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?		x	
	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?	☐	☒
	Comments:		
TVI-06	Is there a code list used for internal TV inspection reporting?	☐	☒
TVI-07	Approximately what percent of the total defects determined by TV inspection, during the past 5, years were attributed to the following?		
	Debris	na	
	Debris/Grease	na	
	Debris/Roots	na	
	Grease	na	
	Grease/Roots	na	
	Intruding Tap	na	
	Intruding Tap/Roots	na	
	Surcharged	na	
	Offset Joint/Grease	na	
	Roots	na	
	Roots/Debris	na	
	Roots/Grease	na	
	Roots/Grease/Debris	na	
	Roots/Line Failure	na	
	Line Failure	na	
	Sag In Line	na	
	Sag In Line/Debris	na	
	Sag In Line/Grease	na	
	Other:		
	Other:		
	Total Percentage		
	Comments:		

TVI-08	Are main line and lateral repairs checked by internal TV	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)	Once every 3 years		
	Comments:			
CLN-03	What is the utility's plan for system cleaning (% or frequency in years)?	Once every 3 years		
	Comments:			
CLN-04	What percent of the total cleaning was considered repeat and trouble spot cleaning during the past year?	na		
	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:			
CLN-07	What is the average number of stoppages experienced per 100 miles of sewer pipe per year?	na		
	Comments:			
CLN-08	Has the number of stoppages increased, decreased, or stayed the same over the past 5 years?			
	Comments:Decreased			
CLN-09	Are stoppages plotted on maps and correlated with other data such as pipe size and material or location?			
	Comments:		x	

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	x		
	Location of stoppage or routine cleaning activity	x		
	Identity of cleaning crew	x		
	Further actions necessary/initiated	x		
	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			
	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			
	If repair is necessary			
	Manhole identifying number/location			
	Wastewater flow characteristics (flowing freely or backed up)			
	Accumulation of grease, debris, or grit			
	Presence of infiltration, location, and estimated quantity			
	Inflow from manhole covers			
	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?		x	
	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	50%		
	Comments:			
PS-06	Does the utility use the following methods when loss of power occurs?			
	On-site electrical generators	x		
	Portable electric generators	x		
	Vacuum trucks to bypass pump station	x		

	Alternate power source	x		
	Other			
	Comments: There is also back up power from another sub-station at our main on-site lift station.			
PS-07	Is there a procedure for manipulating pump operations during wet weather to increase in-line storage of wet weather flows?		x	
	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?	x		
	Comments:			
PS-11	Are the manuals that contain the manufacturers recommended maintenance schedules for all pump station equipment available?	x		
	Comments:			
PS-12	On average, how often were pump stations inspected during the past year?	Once a month		
	Comments:			
PS-13	Are records maintained for each inspection?		x	
	Comments:			
PS-14	Average annual labor hours spent on pump station inspections			
	Comments: information not available			

PS-15	Percent of pump stations with pump capacity redundancy	100%
	Comments:	
PS-16	Percent of pump stations with dry weather capacity limitations	0
	Comments:	
PS-17	Percent of pump stations with wet weather capacity limitations	0
	Comments:	
PS-18	Percent of pump stations calibrated annually	Not available
	Comments:	
PS-19	Percent of pump stations with permanent flow meters	12%
	Comments:	

Capacity Assessment (CA)

Checklist Item		Yes	No	N/A
CA-01	Does the utility have a flow monitoring program?	x		
	Comments:			
CA-02	Does the utility have a comprehensive capacity assessment and planning program?	x		
	Comments:			
CA-03	Are flows measured prior to allowing new connections?	x		
	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.	x		
	Comments: hydraulic models are ran during Master Plan finalization.			
CA-05	Does your capacity assessment tool produce results consistent with conditions observed in the system?	x		
	Comments:			

CA-06	What is the ratio of peak wet weather flow to average dry weather flow at the wastewater treatment plant?	1.2:1		
	Comments:			
CA-07	How many permanent flow meters are currently in the system? (Include meters at pump stations and WWTPs)	4		
	Comments:			
CA-08	How frequently are the flow meters checked?			
	Comments: Flow meters at WWTP/monthly. Verified/calibr by SCADA group/2x year			
CA-09	Do the flow meter checks include the following?			
	Independent water level		x	
	Checking the desiccant		x	
	Velocity reading	x		
	Cleaning away debris	x		
	Downloading data		x	
	Battery condition		x	
	Comments:			

Checklist Item		Yes	No	N/A
CA-10	Are records maintained for each inspection? IF NO, GO TO CA-12	x		
	Comments:			
CA-11	Do the flow monitoring records include the following?			
	Descriptive location of flow meter		x	
	Type of flow meter		x	
	Frequency of flow meter inspection		x	
	Frequency of flow meter calibration		x	
	Comments: flow monitoring records are separate from flow meter inspections.			
CA-12	Does the utility maintain any rain gauges?		x	
	Comments:			
CA-13	Does the utility have any wet weather capacity problems?		x	
	Comments:			
CA-14	Are low points or flood-plain areas monitored during rain events?			n/a

	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?	1		
	Comments:			
TRK-02	What % of SSOs were less than 1,000 gallons in the past 5 years?	100%		
	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		0	
	Lift/Vacuum Systems (Revised term)		0	
	Main and trunk sewers		0	
	Lateral and branch sewers		0	
	Total		0	
	Comments: The last overflow reported was from an over flowed Digester.			
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		0	
	Cause Unknown		0	
	Debris		0	
	Debris/Grease		0	
	Debris/Roots		0	
	Equipment Failure		0	
	Grease		0	
	Sag In Line		0	
	Intruding Tap		0	
	Line Failure		0	
	Manhole/Surcharged		0	
	Offset Joint		0	
	Roots		0	
	Roots/Debris		0	
	Roots/Grease		0	
	Roots/Intruding Tap		0	
	Roots/Line Failure		0	

	Surcharged	0
	Other(s):	0
	Grand Total	0

Comments:

Checklist Item	
TRK-07A	What percentage of SSOs were released to:
	Storm Sewer 0
	Arroyo/Ditch/Drain 0
	Street/ Parking lot 0
	Private Property 0
	River/Stream/Lake/Bayou/Ocean 0
	Other:
	Grand Total 0
	Comments:
TRK-07B	For surface water releases, what percent are to areas that could affect:
	Contact recreation (beaches, swimming areas) 0
	Drinking water sources 0
	Shellfish growing areas 0
	Fishing or spawning areas 0
	Comments:

Checklist Item		Yes	No	N/A
TRK-08	How many chronic SSO locations are in the collection system?	NA		
	Comments:			
TRK-09	Are pipes with chronic SSOs being monitored for sufficient capacity and/or structural condition?			NA
	Comments:			
TRK-10	Prior to collapse, are structurally deteriorating pipelines being monitored for renewal or replacement?	X		
	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?		X	
	Comments: emergencies are responded to immediately			
OERP-05	Do work crews have immediate access to tools and equipment during emergencies?	x		
	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: Procedures are followed as per NPDES permit			
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? <i>(can be delegated to another authority)</i>	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	x	
	Cause(s)	x	
	Names of affected receiving water(s)	x	
	Location	x	
	How it was stopped	x	
	Any remediation efforts	x	
	Estimated flow/volume discharged	x	
	Duration of overflow	x	
	Comments:		
OERP-12	Does the utility have signage to keep public from affected area?		x
	Comments: Affected areas are addressed and cleaned up immediately		

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?		x
	Comments:		
SDT-03	Is there a documented procedure for isolating line segments?		x
	Comments:		
SDT-04	Is there a documented procedure for notifying residents that smoke testing will be conducted in their area?		x
	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>		x	
	Comments:			
SDT-06	Are there guidelines for the weather conditions under which smoke testing should be conducted?		x	

	Comments:		
SDT-07	What is the goal for the % of the system smoke tested each year?		x
	Comments:		
SDT-08	What % of the system has been smoke tested in the past 5 years?	NA	
	Comments:		
SDT-09	Do the written records contain location, address, and description of the smoking element that produced a positive result?		NA
	Comments:		
SDT-10	Does the utility have a dye testing program?	X	
	Comments:		
SDT-11	Are there written procedures for dye testing?	X	
	Comments:		
SDT-12	Does the utility have a goal for the percent of the system dye tested each year?	X	
	Comments:		
SDT-13	What percent of the main collection system had been dye tested over the past year?	0%	
	Comments:		
SDT-14	Does the utility share smoke and dye testing equipment with another utility?		NA
	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	X		
	A major problem			
	Comments:			
HSMC-02	Does the utility have a corrosion control program?	X		
	Comments: We monitor H2S levels at headworks			
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?	x		
	Comments:			
HSMC-05	Are the chemical dosages, dates, and locations documented?	x		
	Comments:			
HSMC-06	Does the utility document where odor is a problem in the system?	x		
	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		x	
	Iron Salts	x		
	Enzymes		x	
	Activated charcoal canisters		x	
	Chlorine		x	
	Sodium hydroxide		x	
	Hydrogen peroxide		x	
	Potassium permanganate		x	
	Biofiltration	x		
	Other			
	Comments:			
HSMC-09	Does the system contain air relief valves at the high points of the force main system?		x	
	Comments:			
HSMC-10	How often are the valves maintained and inspected? (Weekly, Monthly, etc.)			NA
	Comments:			
HSMC-11	Does the utility enforce pretreatment requirements?	x		
	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: Lift stations are monitored by a SCADA system for door entry into lift stations. Lift stations are also fenced and barb wired. Security guards are on-site 24/7 at the Jacob Hands Wastewater Treatment Facility. Emergency Response Plans have also been developed for the Utility as a whole.

Appendix 2
Review
of the
ICIS
E90 Effluent Violations

E90 Effluent Violations From 01/01/2019 - Present

NM0023311

LAS CRUCES, CITY OF

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
01/31/2022	001	A	E. coli	30DAVGEO	BCFU/d	42.5	=	71.96	6
01/31/2022	001	A	E. coli	30DAVGEO	CFU/100	126	=	217.05	6
01/31/2022	001	A	E. coli	DAILY MX	CFU/100	410	=	2419.6	6
01/31/2022	001	A	Solids, suspended percent	MO AV MN	%	85	=	77	1
01/31/2022	001	A	Solids, total suspended	30DA AVG	lb/d	3379	=	4720.9	8
01/31/2022	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	64.6	8
01/31/2022	001	A	Solids, total suspended	7 DA AVG	lb/d	5069	=	5233.9	8
01/31/2022	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	71	8
02/28/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	lb/d	3379	=	5443.4	8
02/28/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	73.1	8
02/28/2022	001	A	BOD, 5-day, 20 deg. C	7 DA AVG	lb/d	5069	=	7749.4	8
02/28/2022	001	A	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	=	102.9	8

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
02/28/2022	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	68	1
02/28/2022	001	A	E. coli	30DAVGEO	BCFU/d	42.5	=	206.31	18
02/28/2022	001	A	E. coli	30DAVGEO	CFU/100	126	=	609.87	18
02/28/2022	001	A	E. coli	DAILY MX	CFU/100	410	>	2419.6	18
02/28/2022	001	A	Solids, suspended percent	MO AV MN	%	85	=	63	1
02/28/2022	001	A	Solids, total suspended	30DA AVG	lb/d	3379	=	6456.8	10
02/28/2022	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	87	10
02/28/2022	001	A	Solids, total suspended	7 DA AVG	lb/d	5069	=	7055.1	10
02/28/2022	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	97.5	10
03/31/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	37.3	2
03/31/2022	001	A	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	=	48.2	2
03/31/2022	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	83	1
03/31/2022	001	A	E. coli	30DAVGEO	BCFU/d	42.5	=	97.31	17
03/31/2022	001	A	E. coli	30DAVGEO	CFU/100	126	=	279.55	17
03/31/2022	001	A	E. coli	DAILY MX	CFU/100	410	=	5419.6	17
03/31/2022	001	A	Solids, suspended percent	MO AV MN	%	85	=	66	1
03/31/2022	001	A	Solids, total suspended	30DA AVG	lb/d	3379	=	5901.8	10
03/31/2022	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	77	10
03/31/2022	001	A	Solids, total suspended	7 DA AVG	lb/d	5069	=	6991.2	10

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
03/31/2022	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	91	10
03/31/2022	001	Q	Polychlorinated biphenyls [	30DA AVG	lb/d	#####	=	#####	4
03/31/2022	001	Q	Polychlorinated biphenyls [	30DA AVG	ug/L	.00102	=	.00268	4
03/31/2022	001	Q	Polychlorinated biphenyls [	DAILY MX	lb/d	#####	=	#####	4
03/31/2022	001	Q	Polychlorinated biphenyls [	DAILY MX	ug/L	.0011	=	.00268	4
04/30/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	lb/d	3379	=	3641.3	4
04/30/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	49.3	4
04/30/2022	001	A	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	=	65.8	4
04/30/2022	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	71	1
04/30/2022	001	A	E. coli	30DAVGEO	BCFU/d	42.5	=	64.96	9
04/30/2022	001	A	E. coli	30DAVGEO	CFU/100	126	=	192.74	9
04/30/2022	001	A	E. coli	DAILY MX	CFU/100	410	=	853.7	9
04/30/2022	001	A	Solids, suspended percent	MO AV MN	%	85	=	59	1
04/30/2022	001	A	Solids, total suspended	30DA AVG	lb/d	3379	=	6911.3	12
04/30/2022	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	93	12
04/30/2022	001	A	Solids, total suspended	7 DA AVG	lb/d	5069	=	8976.4	12
04/30/2022	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	120.9	12
05/31/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	38.1	1
05/31/2022	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	76	1

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
05/31/2022	001	A	E. coli	30DAVGEO	BCFU/d	42.5	=	68.12	7
05/31/2022	001	A	E. coli	30DAVGEO	CFU/100	126	=	200.43	7
05/31/2022	001	A	E. coli	DAILY MX	CFU/100	410	=	1161.6	7
05/31/2022	001	A	Solids, suspended percent	MO AV MN	%	85	=	66	1
05/31/2022	001	A	Solids, total suspended	30DA AVG	lb/d	3379	=	5804.9	9
05/31/2022	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	77.8	9
05/31/2022	001	A	Solids, total suspended	7 DA AVG	lb/d	5069	=	6414.3	9
05/31/2022	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	88.3	9
06/30/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	30.7	1
06/30/2022	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	80	1
06/30/2022	001	A	E. coli	30DAVGEO	BCFU/d	42.5	=	59.58	8
06/30/2022	001	A	E. coli	30DAVGEO	CFU/100	126	=	166.41	8
06/30/2022	001	A	E. coli	DAILY MX	CFU/100	410	=	2419.6	8
06/30/2022	001	A	Solids, suspended percent	MO AV MN	%	85	=	67	1
06/30/2022	001	A	Solids, total suspended	30DA AVG	lb/d	3379	=	5039.7	8
06/30/2022	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	63.9	8
06/30/2022	001	A	Solids, total suspended	7 DA AVG	lb/d	5069	=	5849	8
06/30/2022	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	74.2	8
06/30/2022	001	Q	Polychlorinated biphenyls [	30DA AVG	lb/d	#####	=	.000127	2

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
06/30/2022	001	Q	Polychlorinated biphenyls [	30DA AVG	ug/L	.00102	=	.00157	2
06/30/2022	001	Q	Polychlorinated biphenyls [	DAILY MX	lb/d	#####	=	.000127	2
06/30/2022	001	Q	Polychlorinated biphenyls [	DAILY MX	ug/L	.0011	=	.00157	2
07/31/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	lb/d	3379	=	3835.8	5
07/31/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	48.2	5
07/31/2022	001	A	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	=	63.1	5
07/31/2022	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	62	1
07/31/2022	001	A	E. coli	30DAVGEO	BCFU/d	42.5	=	129.58	13
07/31/2022	001	A	E. coli	30DAVGEO	CFU/100	126	=	355.59	13
07/31/2022	001	A	E. coli	DAILY MX	CFU/100	410	=	1643	13
07/31/2022	001	A	Solids, suspended percent	MO AV MN	%	85	=	56	1
07/31/2022	001	A	Solids, total suspended	30DA AVG	lb/d	3379	=	6792.7	12
07/31/2022	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	85	12
07/31/2022	001	A	Solids, total suspended	7 DA AVG	lb/d	5069	=	7350.6	12
07/31/2022	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	94.9	12
08/31/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	35.9	1
08/31/2022	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	78	1
08/31/2022	001	A	E. coli	30DAVGEO	BCFU/d	42.5	=	118.31	10
08/31/2022	001	A	E. coli	30DAVGEO	CFU/100	126	=	316.96	10

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
08/31/2022	001	A	E. coli	DAILY MX	CFU/100	410	>	2419.6	10
08/31/2022	001	A	Solids, suspended percent	MO AV MN	%	85	=	68	1
08/31/2022	001	A	Solids, total suspended	30DA AVG	lb/d	3379	=	5590.6	10
08/31/2022	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	68.2	10
08/31/2022	001	A	Solids, total suspended	7 DA AVG	lb/d	5069	=	5879.2	10
08/31/2022	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	70.2	10
09/30/2022	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	82	1
09/30/2022	001	A	Solids, suspended percent	MO AV MN	%	85	=	79	1
09/30/2022	001	A	Solids, total suspended	30DA AVG	lb/d	3379	=	3995.2	6
09/30/2022	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	49	6
09/30/2022	001	A	Solids, total suspended	7 DA AVG	lb/d	5069	=	5120.4	6
09/30/2022	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	62.6	6
10/31/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	41.6	3
10/31/2022	001	A	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	=	47.9	3
10/31/2022	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	83	1
10/31/2022	001	A	E. coli	30DAVGEO	BCFU/d	42.5	=	51.33	8
10/31/2022	001	A	E. coli	30DAVGEO	CFU/100	126	=	138.77	8
10/31/2022	001	A	E. coli	DAILY MX	CFU/100	410	>	2419.6	8
10/31/2022	001	A	Solids, suspended percent	MO AV MN	%	85	=	75	1

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
10/31/2022	001	A	Solids, total suspended	30DA AVG	lb/d	3379	=	6366.6	10
10/31/2022	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	77.8	10
10/31/2022	001	A	Solids, total suspended	7 DA AVG	lb/d	5069	=	6841.1	10
10/31/2022	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	82.8	10
11/30/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	lb/d	3379	=	3700.1	5
11/30/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	47.1	5
11/30/2022	001	A	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	=	55.1	5
11/30/2022	001	A	E. coli	30DAVGEO	BCFU/d	42.5	=	62.87	9
11/30/2022	001	A	E. coli	30DAVGEO	CFU/100	126	=	176.26	9
11/30/2022	001	A	E. coli	DAILY MX	CFU/100	410	>	2419.6	9
11/30/2022	001	A	Solids, suspended percent	MO AV MN	%	85	=	76	1
11/30/2022	001	A	Solids, total suspended	30DA AVG	lb/d	3379	=	5885.5	9
11/30/2022	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	75.1	9
11/30/2022	001	A	Solids, total suspended	7 DA AVG	lb/d	5069	=	7385.2	9
11/30/2022	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	98.2	9
12/31/2022	001	A	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	=	51.2	1
12/31/2022	001	A	E. coli	DAILY MX	CFU/100	410	=	2084.3	3
12/31/2022	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	49.8	1
01/31/2023	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	84	1

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
02/28/2023	001	A	E. coli	DAILY MX	CFU/100	410	=	796.7	1
02/28/2023	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	32.2	2
02/28/2023	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	53.8	2
03/31/2023	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	31.9	1
03/31/2023	001	A	E. coli	DAILY MX	CFU/100	410	=	1034.9	3
04/30/2023	001	A	BOD, 5-day, 20 deg. C	30DA AVG	lb/d	3379	=	4538.7	7
04/30/2023	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	58.1	7
04/30/2023	001	A	BOD, 5-day, 20 deg. C	7 DA AVG	lb/d	5069	=	5649.9	7
04/30/2023	001	A	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	=	71.7	7
04/30/2023	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	74	1
04/30/2023	001	A	Solids, total suspended	30DA AVG	lb/d	3379	=	3408.7	4
04/30/2023	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	43.6	4
04/30/2023	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	57.4	4
05/31/2023	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	40.3	2
05/31/2023	001	A	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	=	55.8	2
05/31/2023	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	80	1
05/31/2023	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	39.3	3
05/31/2023	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	52.9	3
07/31/2023	001	A	E. coli	DAILY MX	CFU/100	410	=	898.4	1

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
08/31/2023	001	A	E. coli	DAILY MX	CFU/100	410	=	504.6	1
09/30/2023	001	A	BOD, 5-day, 20 deg. C	30DA AVG	lb/d	3379	=	3396.7	4
09/30/2023	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	39.8	4
09/30/2023	001	A	BOD, 5-day, 20 deg. C	7 DA AVG	mg/L	45	=	51.2	4
09/30/2023	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	80	1
09/30/2023	001	A	E. coli	30DAVGEO	BCFU/d	42.5	=	47.11	3
09/30/2023	001	A	E. coli	DAILY MX	CFU/100	410	=	923.4	3
09/30/2023	001	A	Solids, total suspended	30DA AVG	mg/L	30	=	39.6	3
09/30/2023	001	A	Solids, total suspended	7 DA AVG	mg/L	45	=	57.7	3
09/30/2023	001	Q	Polychlorinated biphenyls [	30DA AVG	lb/d	#####	=	#####	6
09/30/2023	001	Q	Polychlorinated biphenyls [	30DA AVG	ug/L	.00102	=	.001769	6
09/30/2023	001	Q	Polychlorinated biphenyls [	DAILY MX	lb/d	#####	=	#####	6
09/30/2023	001	Q	Polychlorinated biphenyls [	DAILY MX	ug/L	.0011	=	.001769	6
04/30/2024	001	A	E. coli	DAILY MX	CFU/100	410	=	2203	1
07/31/2024	TX1	A	Whole Effluent Toxicity [W	MN VALUE	%	95	=	1	1
08/31/2024	001	A	E. coli	DAILY MX	CFU/100	410	=	469.9	1
08/31/2024	TX1	A	Whole Effluent Toxicity [W	MN VALUE	%	95	=	30	1
09/30/2024	TX1	A	Whole Effluent Toxicity [W	MN VALUE	%	95	<	30	1
09/30/2024	TX1	Q	Whole Effluent Toxicity [W	MN VALUE	%	95	<	30	3

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
10/31/2024	001	A	Polychlorinated biphenyls [	DAILY MX	lb/d	#####	=	#####	2
10/31/2024	001	A	Polychlorinated biphenyls [	DAILY MX	ug/L	#####	=	.00114	2
10/31/2024	TX1	A	Whole Effluent Toxicity [W	MN VALUE	%	95	<	30	1
11/30/2024	TX1	A	Whole Effluent Toxicity [W	MN VALUE	%	95	<	30	1
12/31/2024	001	A	E. coli	DAILY MX	CFU/100	410	=	483.4	1
12/31/2024	001	S	Polychlorinated biphenyls [	DAILY MX	ug/L	#####	=	.001113	2
12/31/2024	TX1	A	Whole Effluent Toxicity [W	MN VALUE	%	95	=	30	1
12/31/2024	TX1	Q	Whole Effluent Toxicity [W	MN VALUE	%	95	<	30	3
01/31/2025	TX1	A	Whole Effluent Toxicity [W	MN VALUE	%	95	<	30	1
02/28/2025	TX1	A	Whole Effluent Toxicity [W	MN VALUE	%	95	<	30	1
03/31/2025	TX1	A	Whole Effluent Toxicity [W	MN VALUE	%	95	<	30	1
03/31/2025	TX1	Q	Whole Effluent Toxicity [W	MN VALUE	%	95	<	30	3