EPA United States Environmental Protection Agency

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Inspection Date(s):	05/10/2017		
Media:	Water		
Regulatory Program(s)	Clean Water Act / NPDES		
Company Name:	**Gadsden Independent School District (ISD) #16**		
Facility Name:			
Facility Physical Location:	1325 West Washington Street		
(city, state, zip code)	Dona Ana County, New Mexico		
Mailing address:	P.O. Box Drawer 70		
(city, state, zip code)	Anthony, New Mexico		
County/Parish:	Doña Ana County		
Facility Contact:	Susan Yturralde	Interim Superintendent	
	syturralde@gisd.k12.nm.us		
FRS Number:	110011027441		
Identification/Permit Number:			
Media Number:	NM0028487		
NAICS:			
SIC:	4952		

Personnel participating in inspection:			
Amy Andrews	USEPA/6EN-WMH	Environmental Engineer	214-907-0638
Kenneth AuBuchon	USEPA/6EN-WMH	Environmental Engineer	281-983-2151
Jennifer Foote	NMED	Municipal Inspector	505-827-0596
Alfredo Holguin	Gadsden ISD	Interim Associate Superintendent	575-882-6949
Jessica Herrera	Gadsden ISD	Director of Physical Plant	575-882-6903
Mario Apodaca	Gadsden ISD	WWTP Operator	575-882-6200

EPA Lead Inspector Signature/Date	AMY ANDREWS Digitally signed by AMY ANDREWS DN: c=US, o=U.S. Government, ou=USEPA, ou=Staff, cn=AMY ANDREWS, dnQualifier=0000131170 Date: 2018.01.10 11:40:18 -07'00'	
	Amy Andrews	Date
Supervisor Signature/Date	Carol Peters	1/9/17
		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Amy Andrews and Kenneth AuBuchon and New Mexico Environment Department (NMED) inspector Jennifer Foote arrived at the Gadsden Independent School District (ISD) #16 at 9:00am on May 10, 2017 for an unannounced inspection. We met with Mr. Mario Apodaca/WWTP Operator at the high school, who then escorted us back to the middle school where we were joined by Mr. Alfredo Holguin/Interim Assistant Superintendent and Ms. Jessica Herrera/Director of Physical Plant for the Opening Conference. Mr. AuBuchon presented his credentials to Mr. Apodaca, Mr. Holguin and Ms. Herrera and informed them that this was an EPA inspection to determine the WWTP's compliance under the Clean Water Act (CWA). This CEI was conducted under the authority of the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the CWA. The generation of this report is based on information supplied by Gadsden ISD representatives, observations made by the EPA inspectors, and records and reports maintained by the permittee (Gadsden ISD), and the EPA.

FACILITY DESCRIPTION

The Gadsden ISD WWTP facility consists of two separate treatment plants, one each at the middle school and the high school in Anthony, New Mexico, in Doña Ana County. The facility is a non-pretreatment facility classified as a minor non-municipal discharger, permitted for with a total flow capacity of 0.09 million gallons per day (MGD). The middle school maintains approximately 1000 students and faculty, and the high school maintains approximately 2000 students when school is in-session. Wastewater from both schools includes the cafeteria, biology and chemistry laboratories, vehicle maintenance shop floor drains and vehicle wash bays. The plant at each school includes a grit removal screen, an aeration basin and a clarifier. Following the clarifier, return activated sludge is pumped back to the aeration basin. The effluent from each WWTP (Outfall 01A is the designated sampling location for the middle school, and Outfall 01B is the sampling location for the high school) flows through piping to a batch tank, where the two effluents mix before going through the ultraviolet (UV) disinfection bank and out to the Rio Grande through Outfall 001.

Section II - OBSERVATIONS

We began the inspection with a records review. Mr. Apodaca explained that samples are usually collected on Thursday of the first week of the month. Samples for Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS) are collected after each of the WWTPs but before the batch tank to the UV disinfection bank, and samples for E. coli bacteria are collected after the UV disinfection.

A tour of the WWTP was conducted after the records review. The WWTP at the middle school looked to be operating within normal parameters, however the high school WWTP appeared to have a denitrification issue in the clarifier, which was causing solids to float over the clarifier baffles. Mr

Apodaca pointed out that he had been collecting the BOD and TSS samples directly after the baffles of the clarifier, which is prior to a holding well at the high school batch plant. Mr. Apodaca stated that samples taken after the holding well were having issues meeting limits, but samples collected directly from the clarifier were within sample limits. Upon viewing the clarifier, floating solids were observed passing over the baffles, and it was noted that by collecting a sample from the clarifier it would be possible to visually ensure that the sample didn't include any of the floating solids. Additionally, since the holding well is an integral part of the batch plant circuit and considered another additional treatment stage, the sample was not collected at the end of the treatment process.

Section III – AREAS OF CONCERN

Requirement

NPDES Permit NM0028487, Part IV: Minor – Sewage Sludge Requirements, Element 2 – Surface Disposal, Section I: Requirements Applying to All Sewage Sludge Surface Disposal,

Item A.3.: *In all cases, if the person (permit holder) who prepares the sewage sludge or supplies the sewage sludge to another person (owner or operator of a sewage sludge unit) for disposal in a surface disposal site, the permit holder shall provide all necessary information to the parties who receive the sludge to assure compliance with these regulations.*

Item A.4.: *The permittee shall give prior notice to EPA (Chief, Permits Branch, Water Management Division, Mail Code 6WQ-P, EPA Region 6, 1445 Ross Avenue, Dallas, Texas 75202) of any planned changes in the sewage sludge disposal practice, in accordance with 40 CFR Park 122.41(I)(1)(iii). These changes may justify the application of permit conditions that are different from or absent in the existing permit. Change in the sludge use or disposal practice may be cause for modification of the permit in accordance with 40 CFR Part 122.62(a)(1).*

Concern

Approximately three years prior to the inspection date, the permittee began contracting with HORVAC Environmental to haul sludge from the WWTPs and surface-dispose of the sludge; previously sludge was hauled to the Doña Ana County South Central WWTP. The permittee was unable to show documentation that notification was given to EPA or NMED of the change in sewage sludge disposal location or facility-type. The permittee was unable to show any sludge sampling or waste manifest records for sludge disposal activities other than a receipt for hauling.

Requirement

40 CFR 503.7 Requirement for a person who prepares sewage sludge*: Any person who prepares sewage sludge shall ensure the applicable requirements in this part are met when the sewage sludge is applied to the land, placed on a surface disposal site, or fired in a sewage sludge incinerator. ("Person" is defined as an individual, association, partnership, corporation, municipality, State or Federal agency, or an agent or employee thereof.)*

503.27 Recordkeeping, (a) *When sewage sludge (other than domestic septage) is placed on an active sewage sludge unit: (1) The person who prepares the sewage sludge shall develop the following information and shall retain the information for five years.*

(i) *The concentration of each pollutant listed in Table 1 of §503.23 in the sewage sludge when the pollutant concentrations in Table 1 of §503.23 are met.*

(ii) *The following certification statement:*

I certify, under penalty of law, that the information that will be used to determine compliance with the pathogen requirements in (insert §503.32(a), §503.32(b)(2), §503.32(b)(3), or §503.32(b)(4) when one of those requirements is met) and the vector attraction reduction requirement in (insert one of the vector attraction reduction requirements in §503.33 (b)(1) through (b)(8) if one of those requirements is met) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

(iii) *A description of how the pathogen requirements in §503.32 (a), (b)(2), (b)(3), or (b)(4) are met when one of those requirements is met.*

(iv) *A description of how one of the vector attraction reduction requirements in §503.33 (b)(1) through (b)(8) is met when one of those requirements is met.*

Concern

The permittee was unable to demonstrate that any of the above-listed recordkeeping requirements were available.

Requirement

NPDES Permit NM0028487, Part III: Standard Conditions, B.3. Proper Operation and Maintenance, a*. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit.*

Concern

The high school WWTP appears to have a denitrification issue in the clarifier, which is causing solids to float over the clarifier baffles. These solids are likely to be the source of TSS, BOD and e. coli sample limit exceedances.

Requirement

40 CFR §122.41(j) Monitoring and records. (1) *Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.*

Concern

The Sampling methodology used for sample collection at Outfall 01B (the internal outfall from the high school) may not result in representative samples of the effluent coming from the high school WWTP (see Observations Section above).

Requirement

NPDES Permit NM0028487, Part III: Standard Conditions, B. Bypass of Treatment Facilities: c. Prohibition of bypass, (1) *Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;* (b) *There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This*

condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance, and, (c) *The permittee submitted notices as require by Part III.B.4.b.*

Concern

After the batch tank where effluent from the middle school WWTP and the High School WWTP mix, and before the UV station, there is bypass piping present which would allow all effluent to leave the facility without passing through the UV station. This bypass piping has a valve which is normally closed to prevent said bypass from occurring, however, there is no lock on the valve and no leak detection system on the valve. This presents the potential for unknown bypasses to occur, or for someone to accidentally or intentionally open the valve to allow a bypass without following any standard procedures or notifications.

Section IV – FOLLOW UP

No information was received by EPA after exiting the Facility on May 10, 2017.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 5 photos taken 5/10/2017
Appendix 2 – NPDES Permit No. NM0028487 dated 03/04/2014, selected pages
Appendix 3 – Sludge Removal Tickets and Manifest for DP-1355 Discharge Site

Appendix 1

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Gadsden Independent School District Waste Water Treatment Plant		
City: Anthony	County/Parish: Doña Ana	State: New Mexico

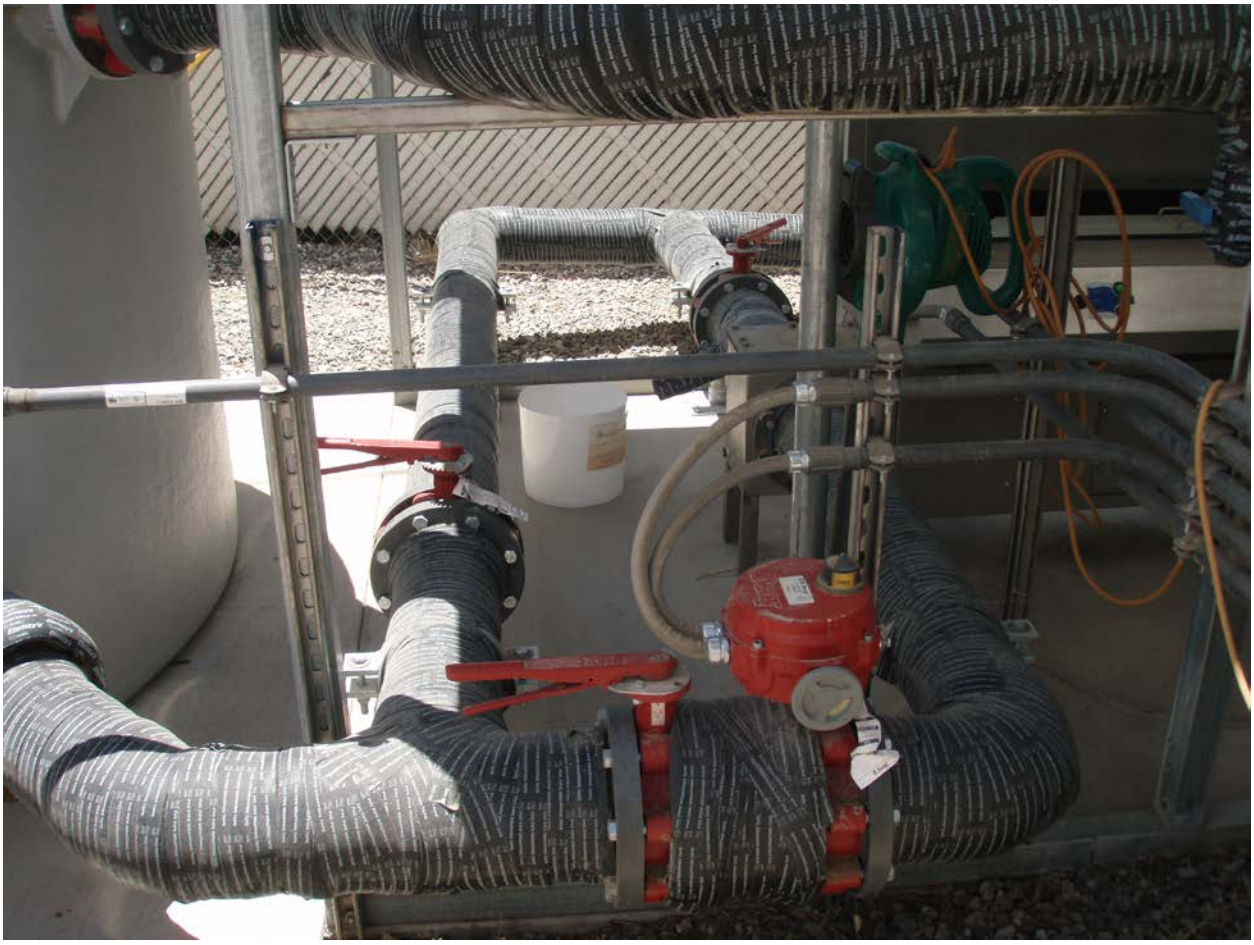

Photo File Name: P5100077.JPG
Date of Photo: 05/10/2017
Time of Photo: 11:30am
Photographer: Kenneth AuBuchon
Description: On the left is the batch tank in which effluent from 01A and 01B mix. The piping shown on the right goes to the UV disinfection banks which are off the edge of the picture to the right. The pipe shown on the left is a bypass pipe with an unlocked valve which would allow effluent to bypass the UV disinfection bank.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Gadsden Independent School District Waste Water Treatment Plant		
City: Anthony	County/Parish: Doña Ana	State: New Mexico

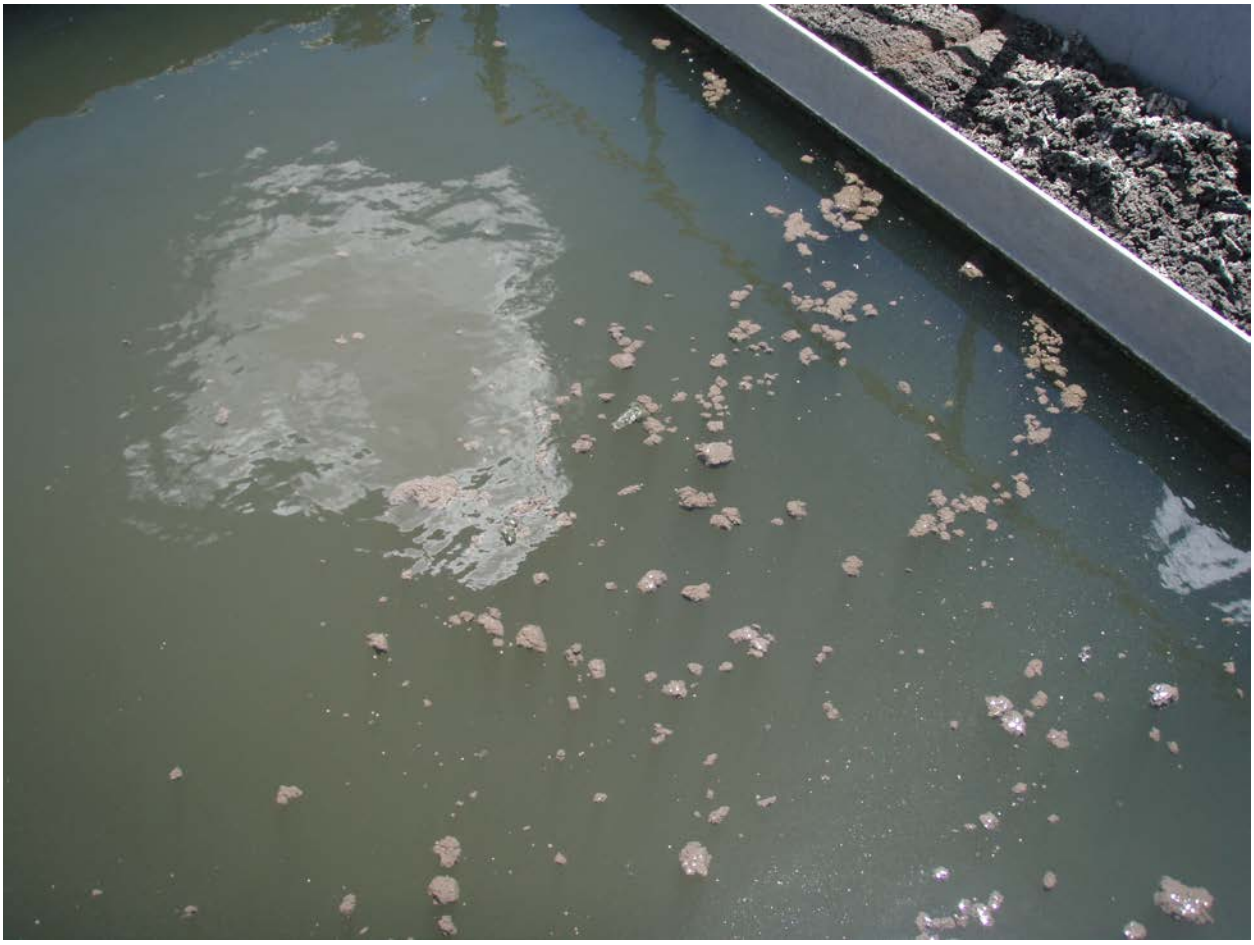

Photo File Name:
Date of Photo: 05/10/2017
Time of Photo: 12:10pm
Photographer: Kenneth AuBuchon
Description: Solids floating in the clarifier at the high school WWTP.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Gadsden Independent School District Waste Water Treatment Plant		
City: Anthony	County/Parish: Doña Ana	State: New Mexico

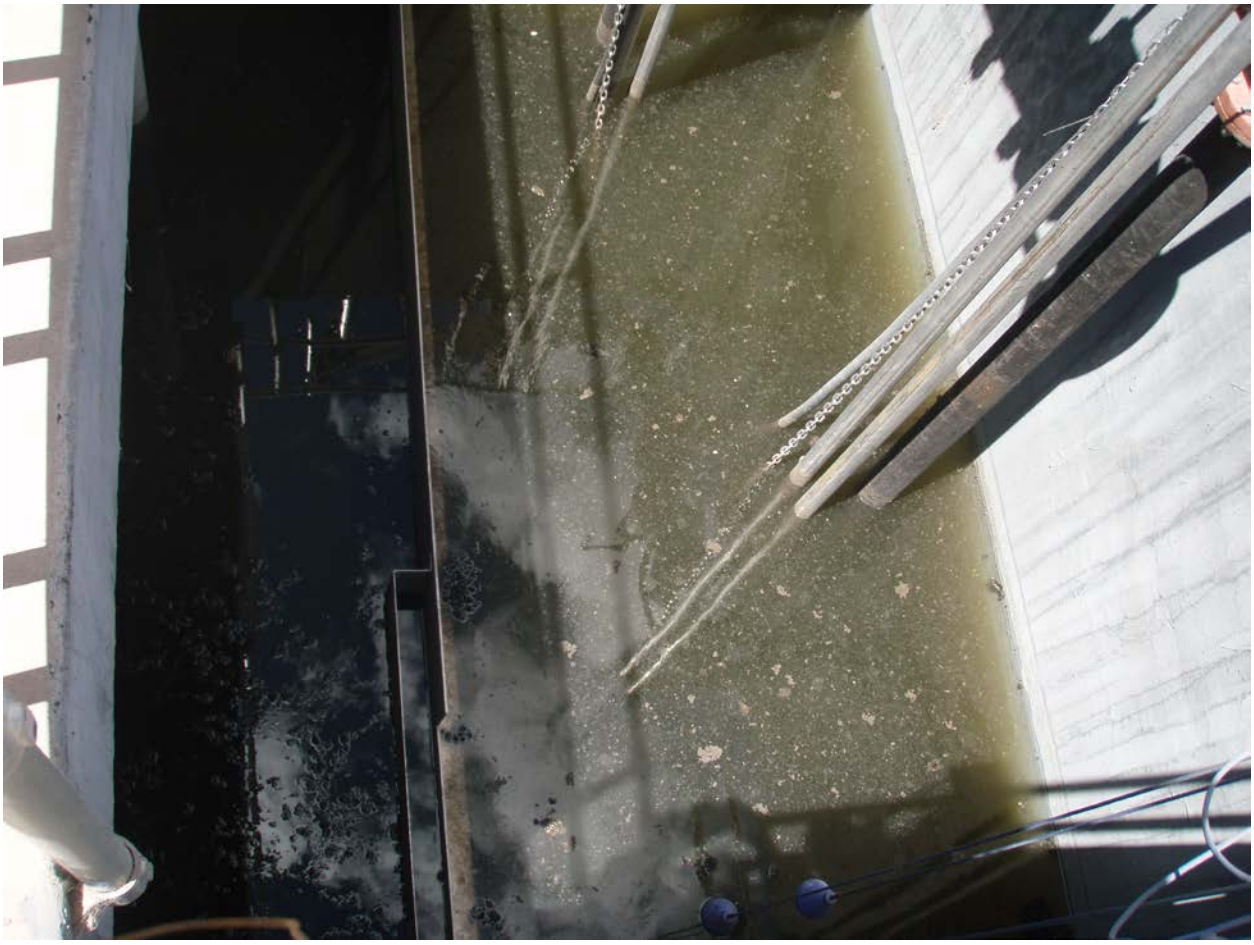

Photo File Name:
Date of Photo: 05/10/2017
Time of Photo: 12:17pm
Photographer: Kenneth AuBuchon
Description: Treated effluent in a holding well at the high school WWTP, after the clarifier and prior to mixing with the effluent from the middle school WWTP.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Gadsden Independent School District Waste Water Treatment Plant		
City: Anthony	County/Parish: Doña Ana	State: New Mexico

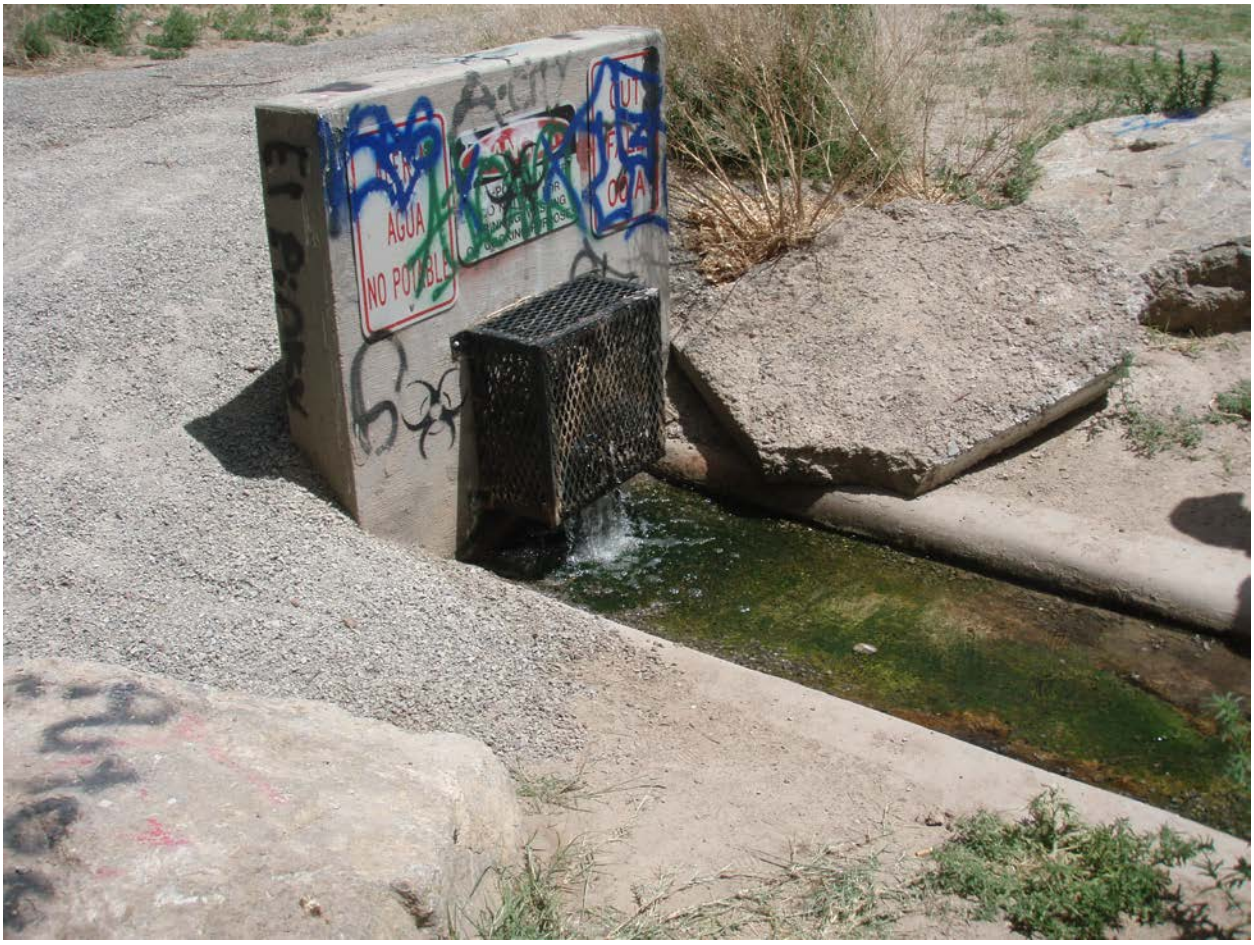

Photo File Name:
Date of Photo: 05/10/2017
Time of Photo: 1:35pm
Photographer: Kenneth AuBuchon
Description: Outfall 001

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Gadsden Independent School District Waste Water Treatment Plant		
City: Anthony	County/Parish: Doña Ana	State: New Mexico

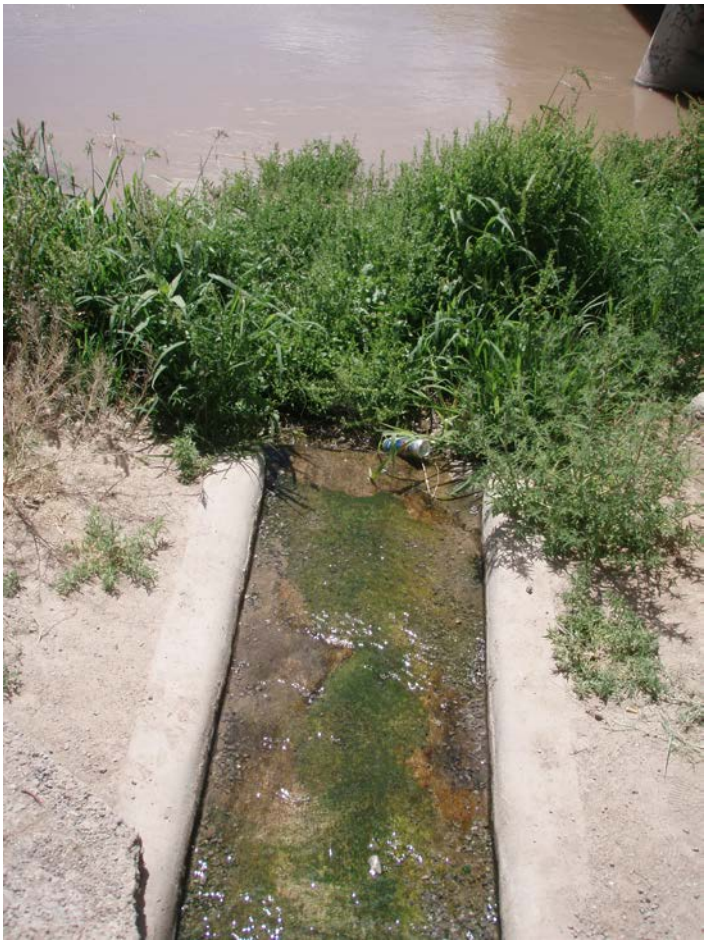

Photo File Name:
Date of Photo: 05/10/2017
Time of Photo: 1:37pm
Photographer: Kenneth AuBuchon
Description: Outfall 001 at the confluence with the Rio Grande.

Appendix 2
NPDES Permit No. NM0028487
dated 03/04/2014, selected pages

REGION 6
1445 ROSS AVENUE
DALLAS, TEXAS 75202-2733

NPDES Permit No NM0028487

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Clean Water Act, as amended, (33 U.S.C. 1251 et. seq; the "Act"),

Gadsden Independent School District
PO Drawer 70
Anthony, NM 88021

is authorized to discharge from a facility located at 1325 West Washington Street, Dona Ana County, New Mexico, to Rio Grande River in Segment 20.6.4.101 of the Rio Grande Basin, from a point located approximately

Outfall 001: Latitude 31° 59' 56.03" N and Longitude 106° 38' 6.52" W

in accordance with this cover page and the effluent limitations, monitoring requirements and other conditions set forth in Part I, Part II, III and Part IV.

This permit supersedes and replaces NPDES Permit No. NM0028487 with an effective date of July 1, 2008.

This permit shall become effective on May 1, 2014

This permit and the authorization to discharge shall expire at midnight, April 30, 2019

Issued on March 25, 2014

William K. Honker, P.E.
Director
Water Quality Protection Division (6WQ)

Prepared by

Tung Nguyen
Environmental Engineer
Permits & Technical Section (6WQ-PP)

11. SEVERABILITY
The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

B. PROPER OPERATION AND MAINTENANCE

1. NEED TO HALT OR REDUCE NOT A DEFENSE
It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. The permittee is responsible for maintaining adequate safeguards to prevent the discharge of untreated or inadequately treated wastes during electrical power failure either by means of alternate power sources, standby generators or retention of inadequately treated effluent.

2. DUTY TO MITIGATE
The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

3. PROPER OPERATION AND MAINTENANCE

a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

4. BYPASS OF TREATMENT FACILITIES

a. BYPASS NOT EXCEEDING LIMITATIONS
The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of Parts III.B.4.b. and 4.c.

b. NOTICE

(1)ANTICIPATED BYPASS
If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.

(2)UNANTICIPATED BYPASS
The permittee shall, within 24 hours, submit notice of an unanticipated bypass as required in Part III.D.7.

c. PROHIBITION OF BYPASS

(1) Bypass is prohibited, and the Director may take enforcement action against a permittee for bypass, unless:

(a) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and,

(c) The permittee submitted notices as required by Part III.B.4.b.

(2) The Director may allow an anticipated bypass after considering its adverse effects, if the Director determines that it will meet the three conditions listed at Part III.B.4.c(1).

MINOR - SEWAGE SLUDGE REQUIREMENTS

INSTRUCTIONS TO PERMITTEES

Select only those Elements and Sections which apply to your sludge reuse or disposal practice.

The sludge conditions do not apply to wastewater treatment lagoons where sludge is not wasted for final reuse/disposal. If the sludge is not removed, the permittee shall indicate on the DMR "No Discharge".

Although reporting is not required at this time, this permit may be modified or revoked and reissued to require an annual DMR.

ELEMENT 1 - LAND APPLICATION

SECTION I: Page 2 - Requirements Applying to All Sewage Sludge Land Application

SECTION II: Page 6 - Requirements Specific to Bulk Sewage Sludge for Application to the Land Meeting Class A or B Pathogen Reduction and the Cumulative Loading Rates in Table 2, or Class B Pathogen Reduction and the Pollutant Concentrations in Table 3

SECTION III: Page 9 - Requirements Specific to Bulk Sewage Sludge Meeting Pollutant Concentrations in Table 3 and Class A Pathogen Reduction Requirements

SECTION IV: Page 10 - Requirements Specific to Sludge Sold or Given Away in a Bag or Other Container for Application to the Land that does not meet the Pollutant Concentrations in Table 3

ELEMENT 2 - SURFACE DISPOSAL

SECTION I: Page 12 - Requirements Applying to All Sewage Sludge Surface Disposal

SECTION II: Page 16 - Requirements Specific to Surface Disposal Sites Without a Liner and Leachate Collection System

SECTION III: Page 17 - Requirements Specific to Surface Disposal Sites With a Liner and Leachate Collection System

ELEMENT 3 - MUNICIPAL SOLID WASTE LANDFILL DISPOSAL

SECTION I: Page 18 - Requirements Applying to All Municipal Solid Waste Landfill Disposal Activities

ELEMENT 2- SURFACE DISPOSAL

SECTION I. REQUIREMENTS APPLYING TO ALL SEWAGE SLUDGE SURFACE DISPOSAL

A. General Requirements

1. The permittee shall handle and dispose of sewage sludge in accordance with Section 405 of the Clean Water Act and all other applicable Federal regulations to protect public health and the environment from any reasonably anticipated adverse effects due to any toxic pollutants which may be present.
2. If requirements for sludge management practices or pollutant criteria become more stringent than the sludge pollutant limits or acceptable management practices in this permit, or control a pollutant not listed in this permit, this permit may be modified or revoked and reissued to conform to the requirements promulgated at Section 405(d)(2) of the Clean Water Act.
3. In all cases, if the person (permit holder) who prepares the sewage sludge or supplies the sewage sludge to another person (owner or operator of a sewage sludge unit) for disposal in a surface disposal site, the permit holder shall provide all necessary information to the parties who receive the sludge to assure compliance with these regulations.
4. The permittee shall give prior notice to EPA (Chief, Permits Branch, Water Management Division, Mail Code 6WQ -P, EPA Region 6, 1445 Ross Avenue, Dallas, Texas 75202) of any planned changes in the sewage sludge disposal practice, in accordance with 40 CFR Part 122.41(l)(1)(iii). These changes may justify the application of permit conditions that are different from or absent in the existing permit. Change in the sludge use or disposal practice may be cause for modification of the permit in accordance with 40 CFR Part 122.62(a)(1).
5. The permittee or owner/operator shall submit a written closure and post closure plan to the permitting authority 180 days prior to the closure date. The plan shall include the following information:

    a. A discussion of how the leachate collection system will be operated and maintained for three years after the surface disposal site closes if it has a liner and leachate collection system.
    b. A description of the system used to monitor continuously for methane gas in the air in any structures within the surface disposal site. The methane gas concentration shall not exceed 25% of the lower explosive limit for methane gas for three years after the sewage sludge unit closes. A description of the system used to monitor for methane gas in the air at the property line of the site shall be included. The methane gas concentration at the surface disposal site property line shall not exceed the lower explosive limit for methane gas for three years after the sewage sludge unit closes.
    c. A discussion of how public access to the surface disposal site will be restricted for three years after it closes.

B. Management Practices

1. An active sewage sludge unit located within 60 meters of a fault that has displacement in Holocene time shall close by March 22, 1994.
2. An active sewage sludge unit located in an unstable area shall close by March 22, 1994.
3. An active sewage sludge unit located in a wetland shall close by March 22, 1994.
4. Surface disposal shall not restrict the flow of the base 100-year flood.
5. The run-off collection system for an active sewage sludge unit shall have the capacity to handle run-off from a 25-year, 24-hour storm event.
6. A food crop, feed crop, or a fiber crop shall not be grown on a surface disposal site.

7. Animals shall not be grazed on a surface disposal site.
8. Public access shall be restricted on the active surface disposal site and for three years after the site closes.
9. Placement of sewage sludge shall not contaminate an aquifer. This shall be demonstrated through one of the following:

   a. Results of a ground-water monitoring program developed by a qualified ground-water scientist.
   b. A certification by a qualified ground-water scientist may be used to demonstrate that sewage sludge placed on an active sewage sludge unit does not contaminate an aquifer.

10. When a cover is placed on an active surface disposal site, the concentration of methane gas in air in any structure within the surface disposal site shall not exceed 25% of the lower explosive limit for methane gas during the period that the sewage sludge unit is active. The concentration of methane gas in air at the property line of the surface disposal site shall not exceed the lower explosive limit for methane gas during the period that the sewage sludge unit is active. Monitoring shall be continuous.

C. Testing Requirements

1. Sewage sludge shall be tested at the frequency show below in Element 2, Section I.D. for PCBs. Any sludge exceeding a concentration of 50 mg/Kg shall not be surface disposed.
2. Pathogen Control

   All sewage sludge that is disposed of in a surface disposal site shall be treated by either the Class A or Class B pathogen requirements unless sewage sludge is placed on an active surface disposal site, and is covered with soil or other material at the end of each operating day.

   a. Six alternatives are available to demonstrate compliance with Class A sewage sludge. All 6 alternatives require either the density of fecal coliform in the sewage sludge be less than 1000 MPN per gram of total solids (dry weight basis), or the density of Salmonella sp. bacteria in the sewage sludge be less than three Most Probable Number per four grams of total solids (dry weight basis) at the time the sewage sludge is used or disposed; at the time the sewage sludge is prepared for sale or given away in a bag or other container for application to the land. Below are the additional requirements necessary to meet the definition of a Class A sludge. Alternatives 5 and 6 are not authorized to demonstrate compliance with Class A sewage sludge in Texas permits.

      Alternative 1 - The temperature of the sewage sludge that is used or disposed shall be maintained at a specific value for a period of time. See 503.32(a)(3)(ii) for specific information.

      Alternative 2 - The pH of the sewage sludge that is used or disposed shall be raised to above 12 and shall remain above 12 for 72 hours. The temperature of the sewage sludge shall be above 52 degrees Celsius for 12 hours or longer during the period that the pH of the sewage sludge is above 12. At the end of the 72 hour period during which the pH of the sewage sludge is above 12, the sewage sludge shall be air dried to achieve a percent solids in the sewage sludge greater than 50%.

Alternative 3 - The sewage sludge shall be analyzed for enteric viruses prior to pathogen treatment. The limit for enteric viruses is one Plaque-forming Unit per four grams of total solids (dry weight basis) either before or following pathogen treatment. See 503.32(a)(5)(ii) for specific information. The sewage sludge shall be analyzed for viable helminth ova prior to pathogen treatment. The limit for viable helminth ova is less than one per four grams of total solids (dry weight basis) either before or following pathogen treatment. See 503.32(a)(5)(iii) for specific information.

Alternative 4 - The density of enteric viruses in the sewage sludge shall be less than one Plaque- forming Unit per four grams of total solids (dry weight bas is) at the time the sewage sludge is used or disposed or at the time the sludge is prepared for sale or give away in a bag or other container for application to the land. The density of viable helminth ova in the sewage sludge shall be less than one per four grams of total solids (dry weight basis) at the time the sewage sludge is used or disposed or at the time the sewage sludge is prepared for sale or give away in a bag or other container for application to the land.

Alternative 5 - Sewage sludge shall be treated by one of the Processes to Further Reduce Pathogens (PFRP) described in 503 Appendix B. PFRPs include composting, heat drying, heat treatment, and thermophilic aerobic digestion.

Alternative 6 - Sewage sludge shall be treated by a process that is equivalent to a Process to Further Reduce Pathogens, if individually approved by the Pathogen Equivalency Committee representing the EPA.

b. Four alternatives are available to demonstrate compliance with Class B sewage sludge. Alternatives 2, 3, and 4 are not authorized to demonstrate compliance with Class B sewage sludge in Texas permits.

Alternative 1 -

- Seven random samples of the sewage sludge shall be collected for one monitoring episode at the time the sewage sludge is used or disposed.
- The geometric mean of the density of fecal coliform in the samples collected shall be less than either 2,000,000 Most Probable Number per gram of total solids (dry weight basis) or 2,000,000 Colony Forming Units per gram of total solids (dry weight basis).

Alternative 2 - Sewage sludge shall be treated in one of the Processes to significantly Reduce Pathogens described in 503 Appendix B.

Alternative 3 - Sewage sludge shall be treated in a process that is equivalent to a PSRP, if individually approved by the Pathogen Equivalency Committee representing the EPA.

Alternative 4 - Sewage sludge placed on an active surface disposal site is covered with soil or other material at the end of each operating day.

3. Vector Attraction Reduction Requirements

All sewage sludge that is disposed of in a surface disposal site shall be treated by one of the following alternatives 1 through 11 for Vector Attraction Reduction.

Alternative 1 - The mass of volatile solids in the sewage sludge shall be reduced by a minimum of 38%.

Alternative 2 - If Alternative 1 cannot be met for an anaerobically digested sludge, demonstration can be made by digesting a portion of the previously digested sludge anaerobically in the laboratory in a bench-scale unit for 40 additional days at a temperature between 30 and 37 degrees Celsius. Volatile solids must be reduced by less than 17% to demonstrate compliance.

Alternative 3 - If Alternative 1 cannot be met for an aerobically digested sludge, demonstration can be made by digesting a portion of the previously digested sludge with a percent solid of two percent or less aerobically in the laboratory in a bench-scale unit for 30 additional days at 20 degrees Celsius. Volatile solids must be reduced by less than 15% to demonstrate compliance.

Alternative 4 - The specific oxygen uptake rate (SOUR) for sewage sludge treated in an aerobic process shall be equal to or less than 1.5 milligrams of oxygen per hour per gram of total solids (dry weight basis) at a temperature of 20 degrees Celsius.

Alternative 5 - Sewage sludge shall be treated in an aerobic process for 14 days or longer. During that time, the temperature of the sewage sludge shall be higher than 40 degrees Celsius and the average temperature of the sewage sludge shall be higher than 45 degrees Celsius.

Alternative 6 - The pH of sewage sludge shall be raised to 12 or higher by alkali addition and, without the addition of more alkali shall remain at 12 or higher for two hours and then at 11.5 or higher for an additional 22 hours.

Alternative 7 - The percent solids of sewage sludge that does not contain unstabilized solids generated in a primary wastewater treatment process shall be equal to or greater than 75% based on the moisture content and total solids prior to mixing with other materials. Unstabilized solids are defined as organic materials in sewage sludge that have not been treated in either an aerobic or an anaerobic treatment process.

Alternative 8 - The percent solids of sewage sludge that contains unstabilized solids generated in a primary wastewater treatment process shall be equal to or greater than 90% based on the moisture content and total solids prior to mixing with other materials. Unstabilized solids are defined as organic materials in sewage sludge that have not been treated in either an aerobic or an anaerobic treatment process.

Alternative 9 -

- Sewage sludge shall be injected below the surface of the land.
- No significant amount of the sewage sludge shall be present on the land surface within one hour after the sewage sludge is injected.
- When sewage sludge that is injected below the surface of the land is Class A with respect to pathogens, the sewage sludge shall be injected below the land surface within eight hours after being discharged from the pathogen treatment process.

Alternative 10 -

- Sewage sludge applied to the land surface or placed on a surface disposal site shall be incorporated into the soil within six hours after application to or placement on the land.
- When sewage sludge that is incorporated into the soil is Class A with respect to pathogens, the sewage sludge shall be applied to or placed on the land within eight hours after being discharged from the pathogen treatment process.

Alternative 11 - Sewage sludge placed on an active sewage sludge unit shall be covered with soil or other material at the end of each operating day.

4. Methane Gas Control Within a Structure On Site

   When cover is placed on an active surface disposal site, the methane gas concentration in the air in any structure shall not exceed 25% of the lower Explosive limit (LEL) for methane gas during the period that the disposal site is active.

5. Methane Gas Control at Property Line

   The concentration of methane gas in air at the property line of the surface disposal site shall not exceed the LEL for methane gas during the period that the disposal site is active.

D. Monitoring Requirements

Methane Gas in covered structures on site - Continuous

Methane Gas at property line - Continuous

All other pollutants shall be monitored at the frequency shown below:

Amount of sewage sludge* (metric tons per 365 day period)	Frequency
0 ≤ Sludge ≤ 290	Once/Year
290 ≤ Sludge < 1,500	Once/Quarter
1,500 ≤ Sludge ≤ 15,000	Once/Two Months
15,000 ≤ Sludge	Once/Month

*Amount of sewage sludge placed on an active sewage sludge unit (dry weight basis).

Representative sample s of sewage sludge shall be collected and analyzed in accordance with the methods referenced in 40 CFR 503.8(b).

SECTION II. REQUIREMENTS SPECIFIC TO SURFACE DISPOSAL SITES WITHOUT A LINER AND LEACHATE COLLECTION SYSTEM.

1. Pollutant limits - Sewage sludge shall not be applied to a surface disposal site if the concentrations of the listed pollutants exceed the corresponding values based on the surface disposal site boundary to the property line distance:

Table 5

Unit boundary to property line distance (meter)	Pollutant concentrations* (mg/kg)			
	Arsenic	Chromium	Nickel	PCB's
0 to < 25	30	200	210	49
25 to < 50	34	220	240	49
50 to < 75	39	260	270	49
75 to < 100	46	300	320	49
100 to < 125	53	360	390	49
125 to < 150	62	450	420	49
≥ 150	73	600	420	49

*Dry weight basis

2. Management practices - Listed in Section I.B. above.
3. Notification requirements

a. The permittee shall assure that the owner of the surface disposal site provide written notification to the subsequent site owners that sewage sludge was placed on the land.
b. The permittee shall provide the location of all existing sludge disposal/use sites to the State Historical Commission within 90 days of the effective date of this permit. In addition, the permittee shall provide the location of any new disposal/use site to the State Historical Commission prior to use of the site.

c. The permittee shall within 30 days after notification by the State Historical Commission that a specific sludge disposal/use area will adversely affect a National Historic Site, cease use of such area.

4. Recordkeeping requirements - The permittee shall develop the following information and shall retain the information for five years. The sludge documents will be retained on site at the same location as other NPDES records.

a. The distance of the surface disposal site from the property line and the concentration (mg/Kg) in the sludge of each pollutant listed above in Table 5, as well as the applicable pollutant concentration criteria listed in Table 5.
b. A certification statement that all applicable requirements (specifically listed) have been met, and that the permittee understands that there are significant penalties for false certification including fine and imprisonment. See 503.27(a)(1)(ii) or 503.27(a)(2)(ii) as applicable to the permittees sludge disposal activities.
c. A description of how either the Class A or Class B pathogen reduction requirements are met, or whether sewage sludge placed on a surface disposal site is covered with soil or other material at the end of each operating day.
d. A description of how the vector attraction reduction requirements are met.
e. Results of a groundwater monitoring program developed by a qualified ground-water scientist, or a certification by a qualified groundwater scientist may be used to demonstrate that sewage sludge placed on an active sewage sludge unit does not contaminate an aquifer. A qualified ground water scientist is an individual with a baccalaureate or post graduate degree in the natural sciences or engineering who has sufficient training and experience in groundwater hydrology and related fields, as may be demonstrated by State registration, professional certification or completion of accredited university programs, to make sound professional judgments regarding groundwater monitoring, pollutant fate and transport, and corrective action.

5. Reporting Requirements - None.

SECTION III. REQUIREMENTS SPECIFIC TO SURFACE DISPOSAL SITES WITH A LINER AND LEACHATE COLLECTION SYSTEM.

1. Pollutant limits - None.
2. Management Practices - Listed in Section I.B. above.
3. Notification requirements

a. The permittee shall assure that the owner of the surface disposal site provide written notification to the subsequent owner of the site that sewage sludge was placed on the land.
b. The permittee shall provide the location of all existing sludge disposal/use sites to the State Historical Commission within 90 days of the effective date of this permit. In addition, the permittee shall provide the location of any new disposal/use site to the State Historical

Commission prior to use of the site. The permittee shall within 30 days after notification by the State Historical Commission that a specific sludge disposal/use area will adversely affect a National Historic Site, cease use of such area.

4. Recordkeeping requirements - The permittee shall develop the following information and shall retain the information for five years. The sludge documents will be retained on site at the same location as other NPDES records.

   a. The following certification statement found in 503.27(a)(1)(ii):

   "I certify, under penalty of law, that the pathogen requirements (define option used) and the vector attraction reduction requirements in (define option used) have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information used to determine the (pathogen requirements and vector attraction reduction requirements, if appropriate) have been met. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."

   b. A description of how either the Class A or Class B pathogen reduction requirements are met or whether sewage sludge placed on a surface disposal site is covered with soil or other material at the end of each operating day.
   c. A description of how the vector attraction reduction requirements are met.
   d. Results of a ground-water monitoring program developed by a qualified ground-water scientist, or a certification by a qualified ground-water scientist may be used to demonstrate that sewage sludge placed on an active sewage sludge unit does not contaminate an aquifer.

5. Reporting Requirements - None.

ELEMENT 3 - MUNICIPAL SOLID WASTE LANDFILL DISPOSAL

SECTION I. REQUIREMENTS APPLYING TO ALL SEWAGE SLUDGE DISPOSED IN A MUNICIPAL SOLID WASTE LANDFILL

1. The permittee shall handle and dispose of sewage sludge in accordance with Section 405 of the Clean Water Act and all other applicable Federal regulations to protect public health and the environment from any reasonably anticipated adverse effects due to any toxic pollutants that may be present. The permittee shall ensure that the sewage sludge meets the requirements in 40 CFR 258 concerning the quality of the sludge disposed in a municipal solid waste land fill.
2. If requirements for sludge management practices or pollutant criteria become more stringent than the sludge pollutant limits or acceptable management practices in this permit, or control a pollutant not listed in this permit, this permit may be modified or revoked and reissued to conform to the requirements promulgated at Section 405(d)(2) of the Clean Water Act.
3. If the permittee generates sewage sludge and supplies that sewage sludge to the owner or operator of a MSWLF for disposal, the permittee shall provide to the owner or operator of the MSWLF appropriate information needed to be in compliance with the provisions of this permit.
4. The permittee shall give prior notice to EPA (Chief, Permits Branch, Water Management Division, Mail Code 6WQ-P, EPA Region 6, 1445 Ross Avenue, Dallas, Texas 75202) of any planned changes in the sewage sludge disposal practice, in accordance with 40 CFR Part 122.41(l)(1)(iii). These changes may justify the application of permit conditions that are different

Appendix 3
Sludge Removal Tickets and Manifest for DP-1355 Discharge Site

HORVAC Environmental

Liquid Waste Manifest for DP-1355 Discharge Site

10-25-16

No. 12189

7178 Donphan Dr. P.O. Box 410 Canutillo, TX 79835 Tel:915-877-3117

#	Collection Point Name & Address:	Waste Type:	Volume Gallons	Collection Date:	Discharge Date:	Discharge Time:	Discharge Cell:
1	Applebees Hischool	SL	10600	10-25	10-25	1200	5
2	Hi 21 South Main St						
3	treatment Plant						
4							
5							

CERTIFICATION:
I hereby declare that liquid wastes identified on this manifest were obtained at the locations and in the volumes as indicated. I certify that the loads have been monitored by odor and visual appearance and to the best of my knowledge these liquid wastes are of the types approved for disposal at the DP-1355 facility.

Transport Driver (Print & Sign)

10-25-16
Date

100462 / 110826
Vehicle License Number

Waste Types:
GR = Grease
BR = Brine
SL = Sludge
SE = Septage

Southwest Envirotec NEW MEXICO

Formerly Southwest Septic

5486 Del Rey Blvd. • Las Cruces, NM 88012 (575) 382-9596

INVOICE
No. 140721

NAME

ADDRESS

PHONE

PLEASE PAY FROM THIS INVOICE, NO STATEMENT WILL BE SENT

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE DATE

DRIVER

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 5% (24 APR).
WE RESERVE THE RIGHT TO REFUSE SERVICE FOR UNPAID BALANCES. THANK YOU.

HORVAC Environmental

Liquid Waste Manifest for DP-1355 Discharge Site

7178 Donphan Dr. P.O. Box 410 Canutillo, TX 79835 Tel:915-877-3117

No. 11522

#	Collection Point Name & Address:	Waste Type:	Volume Gallons	Collection Date:	Discharge Date:	Discharge Time:	Discharge Cell:
1	Sheldon Mcdaniels	SL	1000	6-9-	6-9	130	4
2	Frankie						
3	Carlson						
4							
5	H&D Agoda						

CERTIFICATION:
I hereby declare that liquid wastes identified on this manifest were obtained at the locations and in the volumes as indicated. I certify that the loads have been monitored by odor and visual appearance and to the best of my knowledge these liquid wastes are of the types approved for disposal at the DP-1355 facility.

Transport Driver (Print & Sign) — Date: 6.9.16

11036
Vehicle License Number

Waste Types:
GR = Grease
BR = Brine
SL = Sludge
SE = Septage

Southwest Envirotec NEW MEXICO

Formerly Southwest Septic

5486 Del Rey Blvd. • Las Cruces, NM 88012 (575) 382-9596

INVOICE
No. 140296

NAME

ADDRESS

PHONE

PLEASE PAY FROM THIS INVOICE. NO STATEMENT WILL BE SENT.

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE DATE

DRIVER

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 5% (24 APR).
WE RESERVE THE RIGHT TO REFUSE SERVICE FOR UNPAID BALANCES. THANK YOU.

HORVAC Environmental

SL

Liquid Waste Manifest for DP-1355 Discharge Site

No. 11545

7178 Donphan Dr. P.O. Box 410 Canutillo, TX 79835 Tel:915-877-3117

#	Collection Point Name & Address:	Waste Type:	Volume Gallons	Collection Date:	Discharge Date:	Discharge Time:	Discharge Cell:
1	[illegible]						
2	[illegible]	SL	7000	6.3.	6-3	10	4/5
3	[illegible]		6500	6.3	6.3	1120	4/5
4	[illegible]						
5	[illegible]						

CERTIFICATION:
I hereby declare that liquid wastes identified on this manifest were obtained at the locations and in the volumes as indicated. I certify that the loads have been monitored by odor and visual appearance and to the best of my knowledge these liquid wastes are of the types approved for disposal at the DP-1355 facility.

[illegible] 6.3.16

Transport Driver (Print & Sign) Date

9577 / 5563

Vehicle License Number

Waste Types:
GR = Grease
BR = Brine
SL = Sludge
SE = Septage

Southwest Envirotec
NEW MEXICO

Formerly Southwest Septic

5486 Del Rey Blvd. • Las Cruces, NM 88012 (575) 382-9596

INVOICE
No. 140281

NAME [illegible]

ADDRESS [illegible]

PHONE [illegible]

[illegible]

1500 gls [illegible]

[illegible]

[illegible]

[illegible]

PLEASE PAY FROM THIS INVOICE. NO STATEMENT WILL BE SENT

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE [illegible] DATE 6.3.16

DRIVER [illegible]

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 5% (24 APR).
WE RESERVE THE RIGHT TO REFUSE SERVICE FOR UNPAID BALANCES. THANK YOU.

HORVAC Environmental

Liquid Waste Manifest for DP-1355 Discharge Site

7178 Donphan Dr. P.O. Box 410 Canutillo, TX 79835 Tel:915-877-3117

No. 11669

#	Collection Point Name & Address:	Waste Type:	Volume Gallons	Collection Date:	Discharge Date:	Discharge Time:	Discharge Cell:
1	3 Soldiers Grease Trap	SL	3000	3-23	3.23		5/4
2	Treadwell Pla Hi-Sch	SL	3300	3-23	3-23	1130	
3	Wilson Mid School Grease	RL	1500	3-23	323	1230	5/4
4							
5	Wash Hydrolene						

CERTIFICATION:

I hereby declare that liquid wastes identified on this manifest were obtained at the locations and in the volumes as indicated. I certify that the loads have been monitored by odor and visual appearance and to the best of my knowledge these liquid wastes are of the types approved for disposal at the DP-1355 facility.

Transport Driver (Print & Sign) — Date: 3.23.16

905771/11336

Vehicle License Number

Waste Types:
GR = Grease
BR = Brine
SL = Sludge
SE = Septage

Southwest Envirotec NEW MEXICO

INVOICE

No. 139880

Formerly Southwest Septic
5486 Del Rey Blvd. • Las Cruces, NM 88012
(575) 382-9596

NAME [illegible]

ADDRESS [illegible]

PHONE [illegible]

3 Lift Stations:
1 [illegible] 3000 gal
1 [illegible]
1 [illegible] Station
1 [illegible] Plant
3000 gal
1 [illegible] lift 1500 gal
750 gal

PLEASE PAY FROM THIS INVOICE, NO STATEMENT WILL BE SENT

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE [illegible] DATE [illegible]

DRIVER [illegible]

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 5% (24 APR).
WE RESERVE THE RIGHT TO REFUSE SERVICE FOR UNPAID BALANCES. THANK YOU.

HORVAC Environmental

Liquid Waste Manifest for DP-1355 Discharge Site

7178 Donphan Dr. P.O. Box 410 Canutillo, TX 79835 Tel:915-877-3117

No. 11686

#	Collection Point Name & Address:	Waste Type:	Volume Gallons	Collection Date:	Discharge Date:	Discharge Time:	Discharge Cell:
1	[illegible] Hi School						
2	Franklin MS [illegible]	[illegible]		3/14	3/14	/	/
3	[illegible]						
4							
5	[illegible]						

CERTIFICATION:
I hereby declare that liquid wastes identified on this manifest were obtained at the locations and in the volumes as indicated. I certify that the loads have been monitored by odor and visual appearance and to the best of my knowledge these liquid wastes are of the types approved for disposal at the DP-1355 facility.

[signature] 3.14.16

Transport Driver (Print & Sign) Date

110906

Vehicle License Number

Waste Types:
GR = Grease
BR = Brine
SL = Sludge
SE = Septage

Southwest Envirotec NEW MEXICO

Formerly Southwest Septic

5486 Del Rey Blvd. • Las Cruces, NM 88012

INVOICE

No. 139841

(575) 382-9596

NAME [illegible]

ADDRESS [illegible]

PHONE [illegible]

PO

1 [illegible]

[illegible]

[illegible] 6750

[illegible]

PLEASE PAY FROM THIS INVOICE, NO STATEMENT WILL BE SENT

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE [illegible] DATE 3.14.16

DRIVER [illegible]

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 5% (24 APR).
WE RESERVE THE RIGHT TO REFUSE SERVICE FOR UNPAID BALANCES. THANK YOU.

Southwest Envirotec NEW MEXICO

Formerly Southwest Septic

5486 Del Rey Blvd. • Las Cruces, NM 88012

INVOICE

№ 135071

(575) 382-9596

NAME

ADDRESS

PHONE

Pump from
Treatment Plant
Gadsden Middle
School 6,500 gal

PLEASE PAY FROM THIS INVOICE, NO STATEMENT WILL BE SENT

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE

DATE 7-20-15

DRIVER

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 2% (24 APR) ON ALL UNPAID BALANCES! TOTAL DUE UPON RECEIPT. THANK YOU.

Southwest Envirotec NEW MEXICO

Formerly Southwest Septic
5486 Del Rey Blvd. • Las Cruces, NM 88012

INVOICE
No. 138649

(575) 382-9596

NAME Gadsden H. School
ADDRESS [illegible]
PHONE [illegible]

From Gadsden Middle
to Hi School
4 X 3500 gals

[illegible]
7-2-2015

PLEASE PAY FROM THIS INVOICE, NO STATEMENT WILL BE SENT

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE ______ DATE ______

DRIVER ______

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 5% (24 APR).
WE RESERVE THE RIGHT TO REFUSE SERVICE FOR UNPAID BALANCES. THANK YOU.

Appendix 1

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Gadsden Independent School District Waste Water Treatment Plant		
City: Anthony	County/Parish: Doña Ana	State: New Mexico

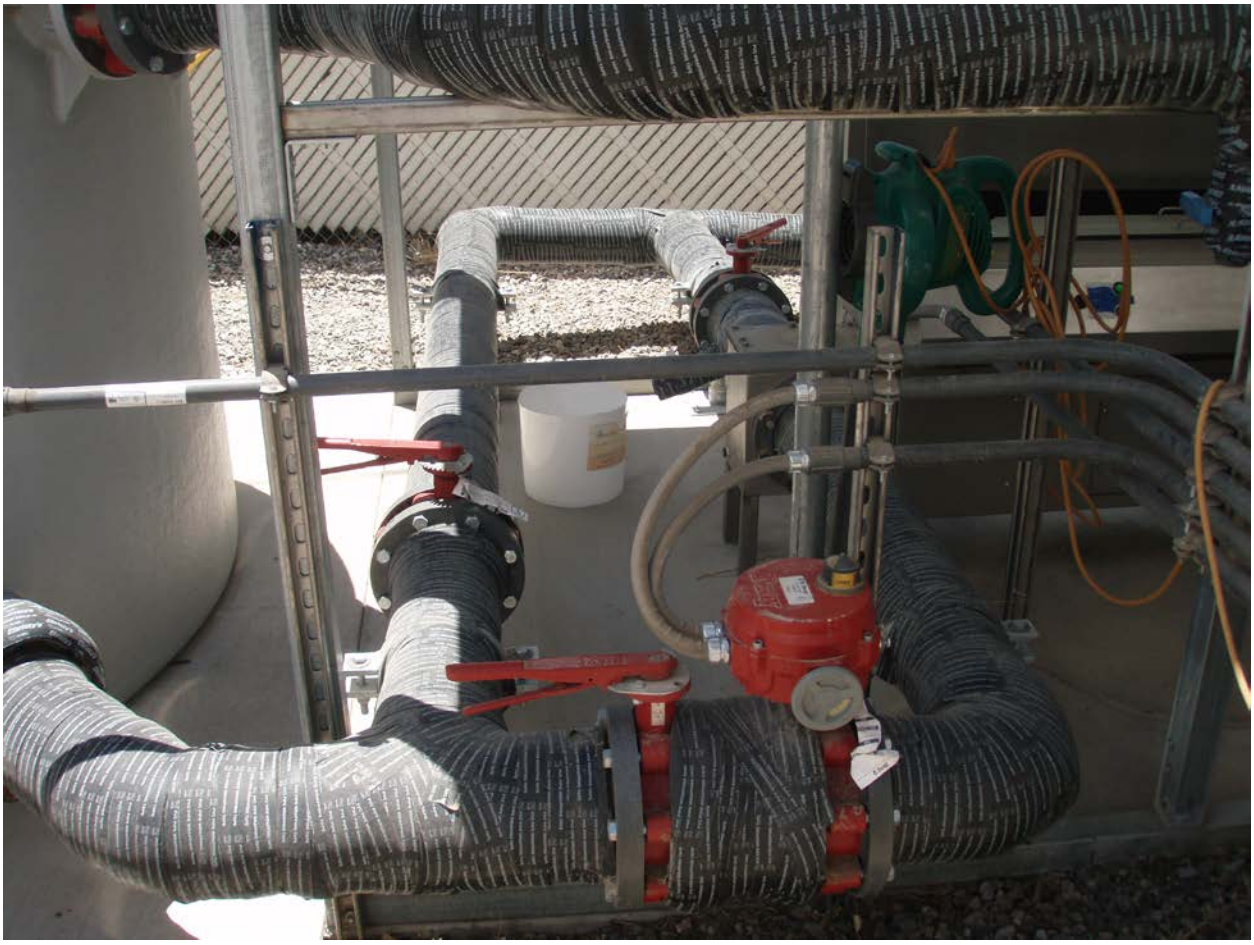

Photo File Name: P5100077.JPG
Date of Photo: 05/10/2017
Time of Photo: 11:30am
Photographer: Kenneth AuBuchon
Description: On the left is the batch tank in which effluent from 01A and 01B mix. The piping shown on the right goes to the UV disinfection banks which are off the edge of the picture to the right. The pipe shown on the left is a bypass pipe with an unlocked valve which would allow effluent to bypass the UV disinfection bank.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Gadsden Independent School District Waste Water Treatment Plant		
City: Anthony	County/Parish: Doña Ana	State: New Mexico

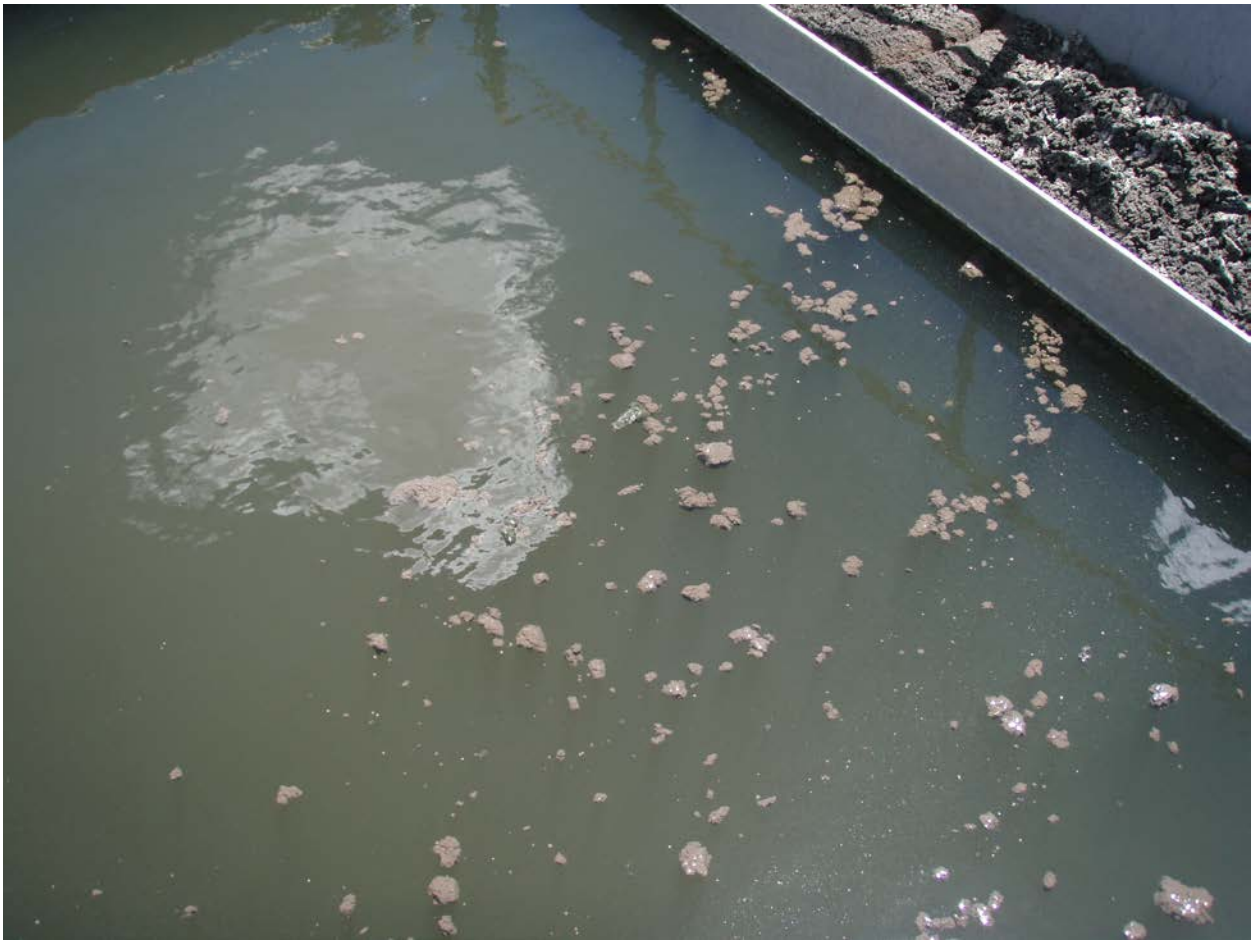

Photo File Name:
Date of Photo: 05/10/2017
Time of Photo: 12:10pm
Photographer: Kenneth AuBuchon
Description: Solids floating in the clarifier at the high school WWTP.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Gadsden Independent School District Waste Water Treatment Plant		
City: Anthony	County/Parish: Doña Ana	State: New Mexico

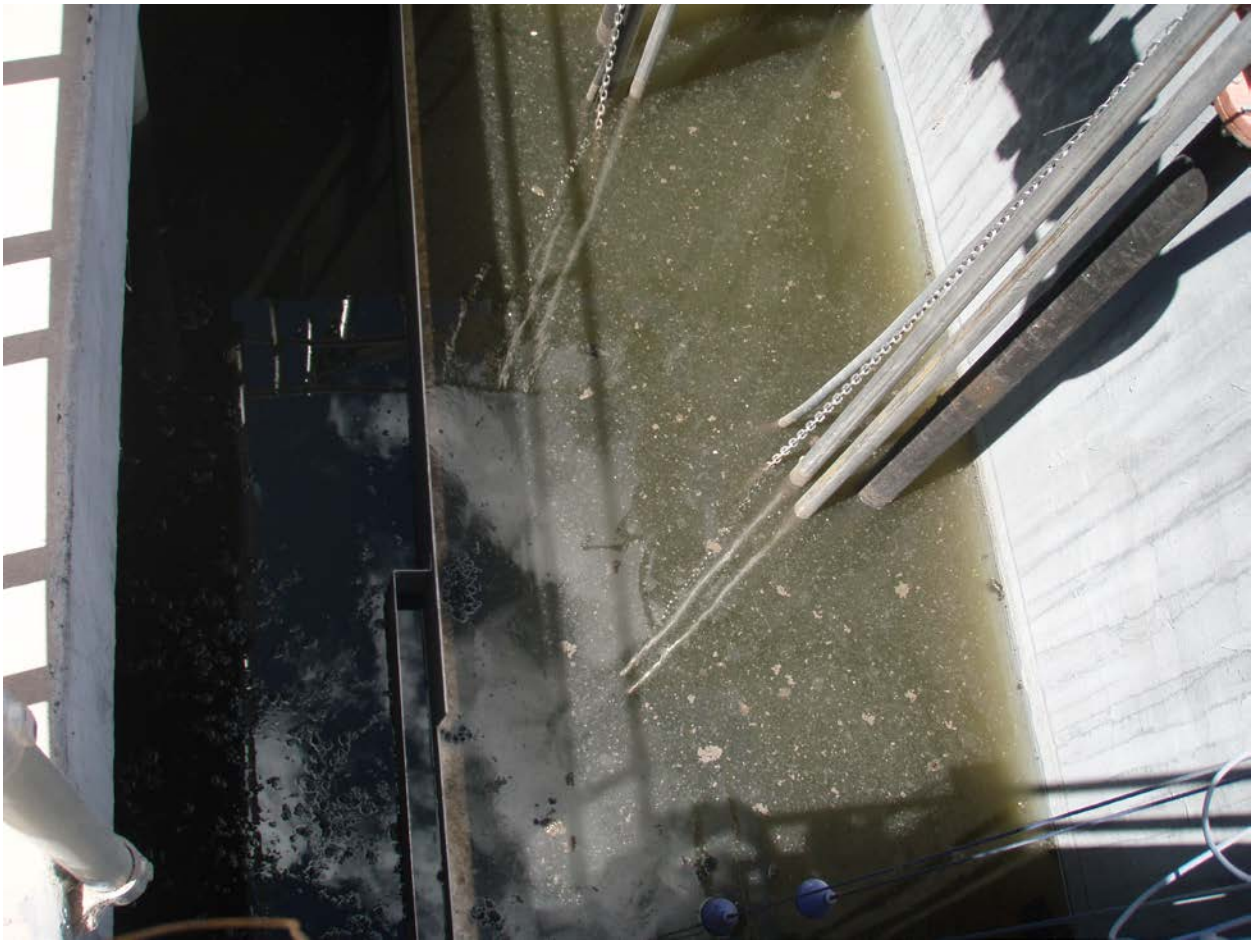

Photo File Name:
Date of Photo: 05/10/2017
Time of Photo: 12:17pm
Photographer: Kenneth AuBuchon
Description: Treated effluent in a holding well at the high school WWTP, after the clarifier and prior to mixing with the effluent from the middle school WWTP.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Gadsden Independent School District Waste Water Treatment Plant		
City: Anthony	County/Parish: Doña Ana	State: New Mexico

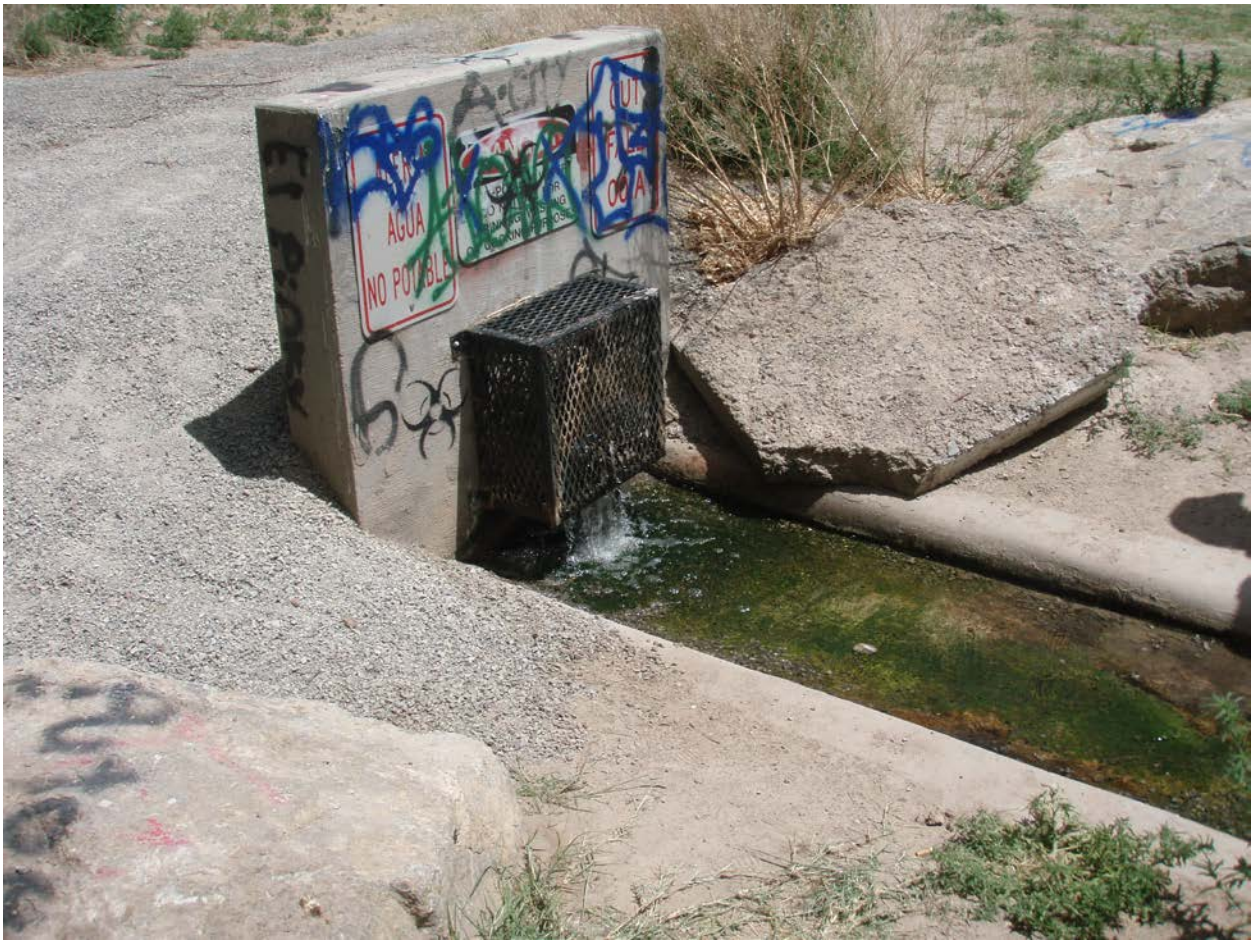

Photo File Name:
Date of Photo: 05/10/2017
Time of Photo: 1:35pm
Photographer: Kenneth AuBuchon
Description: Outfall 001

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Gadsden Independent School District Waste Water Treatment Plant		
City: Anthony	County/Parish: Doña Ana	State: New Mexico

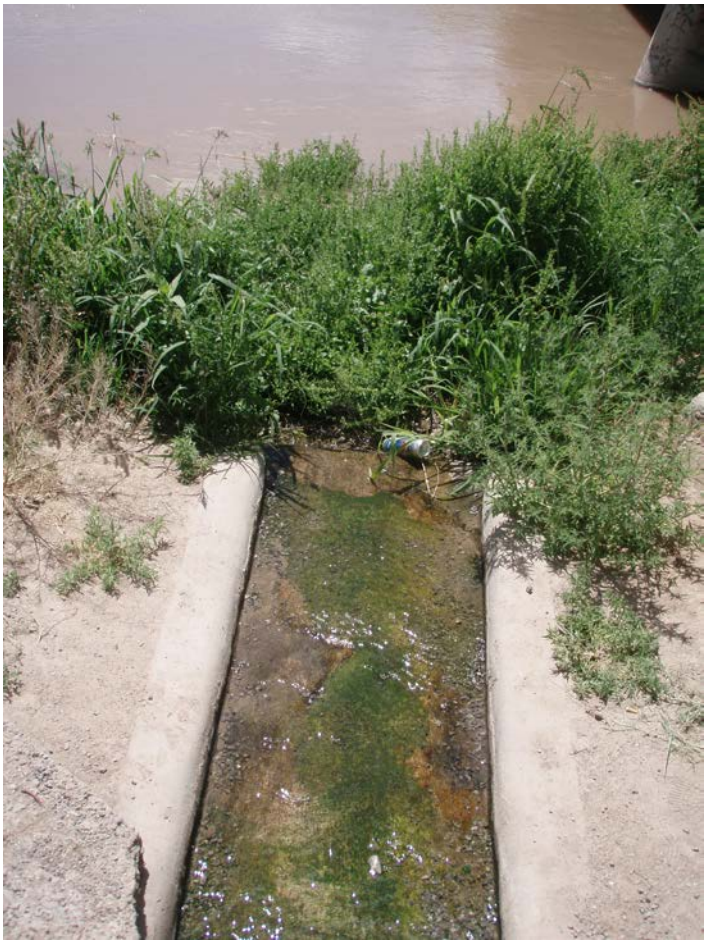

Photo File Name:
Date of Photo: 05/10/2017
Time of Photo: 1:37pm
Photographer: Kenneth AuBuchon
Description: Outfall 001 at the confluence with the Rio Grande.

Appendix 2
NPDES Permit No. NM0028487
dated 03/04/2014, selected pages

REGION 6
1445 ROSS AVENUE
DALLAS, TEXAS 75202-2733

NPDES Permit No NM0028487

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Clean Water Act, as amended, (33 U.S.C. 1251 et. seq; the "Act"),

Gadsden Independent School District
PO Drawer 70
Anthony, NM 88021

is authorized to discharge from a facility located at 1325 West Washington Street, Dona Ana County, New Mexico, to Rio Grande River in Segment 20.6.4.101 of the Rio Grande Basin, from a point located approximately

Outfall 001: Latitude 31° 59' 56.03" N and Longitude 106° 38' 6.52" W

in accordance with this cover page and the effluent limitations, monitoring requirements and other conditions set forth in Part I, Part II, III and Part IV.

This permit supersedes and replaces NPDES Permit No. NM0028487 with an effective date of July 1, 2008.

This permit shall become effective on May 1, 2014

This permit and the authorization to discharge shall expire at midnight, April 30, 2019

Issued on March 25, 2014

William K. Honker, P.E.
Director
Water Quality Protection Division (6WQ)

Prepared by

Tung Nguyen
Environmental Engineer
Permits & Technical Section (6WQ-PP)

11. SEVERABILITY
The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

B. PROPER OPERATION AND MAINTENANCE

1. NEED TO HALT OR REDUCE NOT A DEFENSE
It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. The permittee is responsible for maintaining adequate safeguards to prevent the discharge of untreated or inadequately treated wastes during electrical power failure either by means of alternate power sources, standby generators or retention of inadequately treated effluent.

2. DUTY TO MITIGATE
The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

3. PROPER OPERATION AND MAINTENANCE

a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

4. BYPASS OF TREATMENT FACILITIES

a. BYPASS NOT EXCEEDING LIMITATIONS
The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of Parts III.B.4.b. and 4.c.

b. NOTICE

(1)ANTICIPATED BYPASS
If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.

(2)UNANTICIPATED BYPASS
The permittee shall, within 24 hours, submit notice of an unanticipated bypass as required in Part III.D.7.

c. PROHIBITION OF BYPASS

(1) Bypass is prohibited, and the Director may take enforcement action against a permittee for bypass, unless:

(a) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and,

(c) The permittee submitted notices as required by Part III.B.4.b.

(2) The Director may allow an anticipated bypass after considering its adverse effects, if the Director determines that it will meet the three conditions listed at Part III.B.4.c(1).

MINOR - SEWAGE SLUDGE REQUIREMENTS

INSTRUCTIONS TO PERMITTEES

Select only those Elements and Sections which apply to your sludge reuse or disposal practice.

The sludge conditions do not apply to wastewater treatment lagoons where sludge is not wasted for final reuse/disposal. If the sludge is not removed, the permittee shall indicate on the DMR "No Discharge".

Although reporting is not required at this time, this permit may be modified or revoked and reissued to require an annual DMR.

ELEMENT 1 - LAND APPLICATION

SECTION I: Page 2 - Requirements Applying to All Sewage Sludge Land Application

SECTION II: Page 6 - Requirements Specific to Bulk Sewage Sludge for Application to the Land Meeting Class A or B Pathogen Reduction and the Cumulative Loading Rates in Table 2, or Class B Pathogen Reduction and the Pollutant Concentrations in Table 3

SECTION III: Page 9 - Requirements Specific to Bulk Sewage Sludge Meeting Pollutant Concentrations in Table 3 and Class A Pathogen Reduction Requirements

SECTION IV: Page 10 - Requirements Specific to Sludge Sold or Given Away in a Bag or Other Container for Application to the Land that does not meet the Pollutant Concentrations in Table 3

ELEMENT 2 - SURFACE DISPOSAL

SECTION I: Page 12 - Requirements Applying to All Sewage Sludge Surface Disposal

SECTION II: Page 16 - Requirements Specific to Surface Disposal Sites Without a Liner and Leachate Collection System

SECTION III: Page 17 - Requirements Specific to Surface Disposal Sites With a Liner and Leachate Collection System

ELEMENT 3 - MUNICIPAL SOLID WASTE LANDFILL DISPOSAL

SECTION I: Page 18 - Requirements Applying to All Municipal Solid Waste Landfill Disposal Activities

ELEMENT 2- SURFACE DISPOSAL

SECTION I. REQUIREMENTS APPLYING TO ALL SEWAGE SLUDGE SURFACE DISPOSAL

A. General Requirements

1. The permittee shall handle and dispose of sewage sludge in accordance with Section 405 of the Clean Water Act and all other applicable Federal regulations to protect public health and the environment from any reasonably anticipated adverse effects due to any toxic pollutants which may be present.
2. If requirements for sludge management practices or pollutant criteria become more stringent than the sludge pollutant limits or acceptable management practices in this permit, or control a pollutant not listed in this permit, this permit may be modified or revoked and reissued to conform to the requirements promulgated at Section 405(d)(2) of the Clean Water Act.
3. In all cases, if the person (permit holder) who prepares the sewage sludge or supplies the sewage sludge to another person (owner or operator of a sewage sludge unit) for disposal in a surface disposal site, the permit holder shall provide all necessary information to the parties who receive the sludge to assure compliance with these regulations.
4. The permittee shall give prior notice to EPA (Chief, Permits Branch, Water Management Division, Mail Code 6WQ -P, EPA Region 6, 1445 Ross Avenue, Dallas, Texas 75202) of any planned changes in the sewage sludge disposal practice, in accordance with 40 CFR Part 122.41(l)(1)(iii). These changes may justify the application of permit conditions that are different from or absent in the existing permit. Change in the sludge use or disposal practice may be cause for modification of the permit in accordance with 40 CFR Part 122.62(a)(1).
5. The permittee or owner/operator shall submit a written closure and post closure plan to the permitting authority 180 days prior to the closure date. The plan shall include the following information:

    a. A discussion of how the leachate collection system will be operated and maintained for three years after the surface disposal site closes if it has a liner and leachate collection system.
    b. A description of the system used to monitor continuously for methane gas in the air in any structures within the surface disposal site. The methane gas concentration shall not exceed 25% of the lower explosive limit for methane gas for three years after the sewage sludge unit closes. A description of the system used to monitor for methane gas in the air at the property line of the site shall be included. The methane gas concentration at the surface disposal site property line shall not exceed the lower explosive limit for methane gas for three years after the sewage sludge unit closes.
    c. A discussion of how public access to the surface disposal site will be restricted for three years after it closes.

B. Management Practices

1. An active sewage sludge unit located within 60 meters of a fault that has displacement in Holocene time shall close by March 22, 1994.
2. An active sewage sludge unit located in an unstable area shall close by March 22, 1994.
3. An active sewage sludge unit located in a wetland shall close by March 22, 1994.
4. Surface disposal shall not restrict the flow of the base 100-year flood.
5. The run-off collection system for an active sewage sludge unit shall have the capacity to handle run-off from a 25-year, 24-hour storm event.
6. A food crop, feed crop, or a fiber crop shall not be grown on a surface disposal site.

7. Animals shall not be grazed on a surface disposal site.
8. Public access shall be restricted on the active surface disposal site and for three years after the site closes.
9. Placement of sewage sludge shall not contaminate an aquifer. This shall be demonstrated through one of the following:

   a. Results of a ground-water monitoring program developed by a qualified ground-water scientist.
   b. A certification by a qualified ground-water scientist may be used to demonstrate that sewage sludge placed on an active sewage sludge unit does not contaminate an aquifer.

10. When a cover is placed on an active surface disposal site, the concentration of methane gas in air in any structure within the surface disposal site shall not exceed 25% of the lower explosive limit for methane gas during the period that the sewage sludge unit is active. The concentration of methane gas in air at the property line of the surface disposal site shall not exceed the lower explosive limit for methane gas during the period that the sewage sludge unit is active. Monitoring shall be continuous.

C. Testing Requirements

1. Sewage sludge shall be tested at the frequency show below in Element 2, Section I.D. for PCBs. Any sludge exceeding a concentration of 50 mg/Kg shall not be surface disposed.
2. Pathogen Control

   All sewage sludge that is disposed of in a surface disposal site shall be treated by either the Class A or Class B pathogen requirements unless sewage sludge is placed on an active surface disposal site, and is covered with soil or other material at the end of each operating day.

   a. Six alternatives are available to demonstrate compliance with Class A sewage sludge. All 6 alternatives require either the density of fecal coliform in the sewage sludge be less than 1000 MPN per gram of total solids (dry weight basis), or the density of Salmonella sp. bacteria in the sewage sludge be less than three Most Probable Number per four grams of total solids (dry weight basis) at the time the sewage sludge is used or disposed; at the time the sewage sludge is prepared for sale or given away in a bag or other container for application to the land. Below are the additional requirements necessary to meet the definition of a Class A sludge. Alternatives 5 and 6 are not authorized to demonstrate compliance with Class A sewage sludge in Texas permits.

      Alternative 1 - The temperature of the sewage sludge that is used or disposed shall be maintained at a specific value for a period of time. See 503.32(a)(3)(ii) for specific information.

      Alternative 2 - The pH of the sewage sludge that is used or disposed shall be raised to above 12 and shall remain above 12 for 72 hours. The temperature of the sewage sludge shall be above 52 degrees Celsius for 12 hours or longer during the period that the pH of the sewage sludge is above 12. At the end of the 72 hour period during which the pH of the sewage sludge is above 12, the sewage sludge shall be air dried to achieve a percent solids in the sewage sludge greater than 50%.

Alternative 3 - The sewage sludge shall be analyzed for enteric viruses prior to pathogen treatment. The limit for enteric viruses is one Plaque-forming Unit per four grams of total solids (dry weight basis) either before or following pathogen treatment. See 503.32(a)(5)(ii) for specific information. The sewage sludge shall be analyzed for viable helminth ova prior to pathogen treatment. The limit for viable helminth ova is less than one per four grams of total solids (dry weight basis) either before or following pathogen treatment. See 503.32(a)(5)(iii) for specific information.

Alternative 4 - The density of enteric viruses in the sewage sludge shall be less than one Plaque- forming Unit per four grams of total solids (dry weight bas is) at the time the sewage sludge is used or disposed or at the time the sludge is prepared for sale or give away in a bag or other container for application to the land. The density of viable helminth ova in the sewage sludge shall be less than one per four grams of total solids (dry weight basis) at the time the sewage sludge is used or disposed or at the time the sewage sludge is prepared for sale or give away in a bag or other container for application to the land.

Alternative 5 - Sewage sludge shall be treated by one of the Processes to Further Reduce Pathogens (PFRP) described in 503 Appendix B. PFRPs include composting, heat drying, heat treatment, and thermophilic aerobic digestion.

Alternative 6 - Sewage sludge shall be treated by a process that is equivalent to a Process to Further Reduce Pathogens, if individually approved by the Pathogen Equivalency Committee representing the EPA.

b. Four alternatives are available to demonstrate compliance with Class B sewage sludge. Alternatives 2, 3, and 4 are not authorized to demonstrate compliance with Class B sewage sludge in Texas permits.

Alternative 1 -

- Seven random samples of the sewage sludge shall be collected for one monitoring episode at the time the sewage sludge is used or disposed.
- The geometric mean of the density of fecal coliform in the samples collected shall be less than either 2,000,000 Most Probable Number per gram of total solids (dry weight basis) or 2,000,000 Colony Forming Units per gram of total solids (dry weight basis).

Alternative 2 - Sewage sludge shall be treated in one of the Processes to significantly Reduce Pathogens described in 503 Appendix B.

Alternative 3 - Sewage sludge shall be treated in a process that is equivalent to a PSRP, if individually approved by the Pathogen Equivalency Committee representing the EPA.

Alternative 4 - Sewage sludge placed on an active surface disposal site is covered with soil or other material at the end of each operating day.

3. Vector Attraction Reduction Requirements

All sewage sludge that is disposed of in a surface disposal site shall be treated by one of the following alternatives 1 through 11 for Vector Attraction Reduction.

Alternative 1 - The mass of volatile solids in the sewage sludge shall be reduced by a minimum of 38%.

Alternative 2 - If Alternative 1 cannot be met for an anaerobically digested sludge, demonstration can be made by digesting a portion of the previously digested sludge anaerobically in the laboratory in a bench-scale unit for 40 additional days at a temperature between 30 and 37 degrees Celsius. Volatile solids must be reduced by less than 17% to demonstrate compliance.

Alternative 3 - If Alternative 1 cannot be met for an aerobically digested sludge, demonstration can be made by digesting a portion of the previously digested sludge with a percent solid of two percent or less aerobically in the laboratory in a bench-scale unit for 30 additional days at 20 degrees Celsius. Volatile solids must be reduced by less than 15% to demonstrate compliance.

Alternative 4 - The specific oxygen uptake rate (SOUR) for sewage sludge treated in an aerobic process shall be equal to or less than 1.5 milligrams of oxygen per hour per gram of total solids (dry weight basis) at a temperature of 20 degrees Celsius.

Alternative 5 - Sewage sludge shall be treated in an aerobic process for 14 days or longer. During that time, the temperature of the sewage sludge shall be higher than 40 degrees Celsius and the average temperature of the sewage sludge shall be higher than 45 degrees Celsius.

Alternative 6 - The pH of sewage sludge shall be raised to 12 or higher by alkali addition and, without the addition of more alkali shall remain at 12 or higher for two hours and then at 11.5 or higher for an additional 22 hours.

Alternative 7 - The percent solids of sewage sludge that does not contain unstabilized solids generated in a primary wastewater treatment process shall be equal to or greater than 75% based on the moisture content and total solids prior to mixing with other materials. Unstabilized solids are defined as organic materials in sewage sludge that have not been treated in either an aerobic or an anaerobic treatment process.

Alternative 8 - The percent solids of sewage sludge that contains unstabilized solids generated in a primary wastewater treatment process shall be equal to or greater than 90% based on the moisture content and total solids prior to mixing with other materials. Unstabilized solids are defined as organic materials in sewage sludge that have not been treated in either an aerobic or an anaerobic treatment process.

Alternative 9 -

- Sewage sludge shall be injected below the surface of the land.
- No significant amount of the sewage sludge shall be present on the land surface within one hour after the sewage sludge is injected.
- When sewage sludge that is injected below the surface of the land is Class A with respect to pathogens, the sewage sludge shall be injected below the land surface within eight hours after being discharged from the pathogen treatment process.

Alternative 10 -

- Sewage sludge applied to the land surface or placed on a surface disposal site shall be incorporated into the soil within six hours after application to or placement on the land.
- When sewage sludge that is incorporated into the soil is Class A with respect to pathogens, the sewage sludge shall be applied to or placed on the land within eight hours after being discharged from the pathogen treatment process.

Alternative 11 - Sewage sludge placed on an active sewage sludge unit shall be covered with soil or other material at the end of each operating day.

4. Methane Gas Control Within a Structure On Site

   When cover is placed on an active surface disposal site, the methane gas concentration in the air in any structure shall not exceed 25% of the lower Explosive limit (LEL) for methane gas during the period that the disposal site is active.

5. Methane Gas Control at Property Line

   The concentration of methane gas in air at the property line of the surface disposal site shall not exceed the LEL for methane gas during the period that the disposal site is active.

D. Monitoring Requirements

Methane Gas in covered structures on site - Continuous

Methane Gas at property line - Continuous

All other pollutants shall be monitored at the frequency shown below:

Amount of sewage sludge* (metric tons per 365 day period)	Frequency
0 ≤ Sludge ≤ 290	Once/Year
290 ≤ Sludge < 1,500	Once/Quarter
1,500 ≤ Sludge ≤ 15,000	Once/Two Months
15,000 ≤ Sludge	Once/Month

*Amount of sewage sludge placed on an active sewage sludge unit (dry weight basis).

Representative sample s of sewage sludge shall be collected and analyzed in accordance with the methods referenced in 40 CFR 503.8(b).

SECTION II. REQUIREMENTS SPECIFIC TO SURFACE DISPOSAL SITES WITHOUT A LINER AND LEACHATE COLLECTION SYSTEM.

1. Pollutant limits - Sewage sludge shall not be applied to a surface disposal site if the concentrations of the listed pollutants exceed the corresponding values based on the surface disposal site boundary to the property line distance:

Table 5

Unit boundary to property line distance (meter)	Pollutant concentrations* (mg/kg)			
	Arsenic	Chromium	Nickel	PCB's
0 to < 25	30	200	210	49
25 to < 50	34	220	240	49
50 to < 75	39	260	270	49
75 to < 100	46	300	320	49
100 to < 125	53	360	390	49
125 to < 150	62	450	420	49
≥ 150	73	600	420	49

*Dry weight basis

2. Management practices - Listed in Section I.B. above.
3. Notification requirements

a. The permittee shall assure that the owner of the surface disposal site provide written notification to the subsequent site owners that sewage sludge was placed on the land.
b. The permittee shall provide the location of all existing sludge disposal/use sites to the State Historical Commission within 90 days of the effective date of this permit. In addition, the permittee shall provide the location of any new disposal/use site to the State Historical Commission prior to use of the site.

c. The permittee shall within 30 days after notification by the State Historical Commission that a specific sludge disposal/use area will adversely affect a National Historic Site, cease use of such area.

4. Recordkeeping requirements - The permittee shall develop the following information and shall retain the information for five years. The sludge documents will be retained on site at the same location as other NPDES records.

a. The distance of the surface disposal site from the property line and the concentration (mg/Kg) in the sludge of each pollutant listed above in Table 5, as well as the applicable pollutant concentration criteria listed in Table 5.
b. A certification statement that all applicable requirements (specifically listed) have been met, and that the permittee understands that there are significant penalties for false certification including fine and imprisonment. See 503.27(a)(1)(ii) or 503.27(a)(2)(ii) as applicable to the permittees sludge disposal activities.
c. A description of how either the Class A or Class B pathogen reduction requirements are met, or whether sewage sludge placed on a surface disposal site is covered with soil or other material at the end of each operating day.
d. A description of how the vector attraction reduction requirements are met.
e. Results of a groundwater monitoring program developed by a qualified ground-water scientist, or a certification by a qualified groundwater scientist may be used to demonstrate that sewage sludge placed on an active sewage sludge unit does not contaminate an aquifer. A qualified ground water scientist is an individual with a baccalaureate or post graduate degree in the natural sciences or engineering who has sufficient training and experience in groundwater hydrology and related fields, as may be demonstrated by State registration, professional certification or completion of accredited university programs, to make sound professional judgments regarding groundwater monitoring, pollutant fate and transport, and corrective action.

5. Reporting Requirements - None.

SECTION III. REQUIREMENTS SPECIFIC TO SURFACE DISPOSAL SITES WITH A LINER AND LEACHATE COLLECTION SYSTEM.

1. Pollutant limits - None.
2. Management Practices - Listed in Section I.B. above.
3. Notification requirements

a. The permittee shall assure that the owner of the surface disposal site provide written notification to the subsequent owner of the site that sewage sludge was placed on the land.
b. The permittee shall provide the location of all existing sludge disposal/use sites to the State Historical Commission within 90 days of the effective date of this permit. In addition, the permittee shall provide the location of any new disposal/use site to the State Historical

Commission prior to use of the site. The permittee shall within 30 days after notification by the State Historical Commission that a specific sludge disposal/use area will adversely affect a National Historic Site, cease use of such area.

4. Recordkeeping requirements - The permittee shall develop the following information and shall retain the information for five years. The sludge documents will be retained on site at the same location as other NPDES records.

   a. The following certification statement found in 503.27(a)(1)(ii):

   "I certify, under penalty of law, that the pathogen requirements (define option used) and the vector attraction reduction requirements in (define option used) have been met. This determination has been made under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information used to determine the (pathogen requirements and vector attraction reduction requirements, if appropriate) have been met. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."

   b. A description of how either the Class A or Class B pathogen reduction requirements are met or whether sewage sludge placed on a surface disposal site is covered with soil or other material at the end of each operating day.
   c. A description of how the vector attraction reduction requirements are met.
   d. Results of a ground-water monitoring program developed by a qualified ground-water scientist, or a certification by a qualified ground-water scientist may be used to demonstrate that sewage sludge placed on an active sewage sludge unit does not contaminate an aquifer.

5. Reporting Requirements - None.

ELEMENT 3 - MUNICIPAL SOLID WASTE LANDFILL DISPOSAL

SECTION I. REQUIREMENTS APPLYING TO ALL SEWAGE SLUDGE DISPOSED IN A MUNICIPAL SOLID WASTE LANDFILL

1. The permittee shall handle and dispose of sewage sludge in accordance with Section 405 of the Clean Water Act and all other applicable Federal regulations to protect public health and the environment from any reasonably anticipated adverse effects due to any toxic pollutants that may be present. The permittee shall ensure that the sewage sludge meets the requirements in 40 CFR 258 concerning the quality of the sludge disposed in a municipal solid waste land fill.
2. If requirements for sludge management practices or pollutant criteria become more stringent than the sludge pollutant limits or acceptable management practices in this permit, or control a pollutant not listed in this permit, this permit may be modified or revoked and reissued to conform to the requirements promulgated at Section 405(d)(2) of the Clean Water Act.
3. If the permittee generates sewage sludge and supplies that sewage sludge to the owner or operator of a MSWLF for disposal, the permittee shall provide to the owner or operator of the MSWLF appropriate information needed to be in compliance with the provisions of this permit.
4. The permittee shall give prior notice to EPA (Chief, Permits Branch, Water Management Division, Mail Code 6WQ-P, EPA Region 6, 1445 Ross Avenue, Dallas, Texas 75202) of any planned changes in the sewage sludge disposal practice, in accordance with 40 CFR Part 122.41(l)(1)(iii). These changes may justify the application of permit conditions that are different

Appendix 3
Sludge Removal Tickets and Manifest for DP-1355 Discharge Site

HORVAC Environmental

Liquid Waste Manifest for DP-1355 Discharge Site

10-25-16

No. 12189

7178 Donphan Dr. P.O. Box 410 Canutillo, TX 79835 Tel:915-877-3117

#	Collection Point Name & Address:	Waste Type:	Volume Gallons	Collection Date:	Discharge Date:	Discharge Time:	Discharge Cell:
1	Applebees Hischool	SL	10600	10-25	10-25-16	1200	5
2	Hi 20 South Market						
3	treatment Palast						
4							
5							

CERTIFICATION:
I hereby declare that liquid wastes identified on this manifest were obtained at the locations and in the volumes as indicated. I certify that the loads have been monitored by odor and visual appearance and to the best of my knowledge these liquid wastes are of the types approved for disposal at the DP-1355 facility.

Transport Driver (Print & Sign)

10-25-16
Date

100462 / 110826
Vehicle License Number

Waste Types:
GR = Grease
BR = Brine
SL = Sludge
SE = Septage

Southwest Envirotec NEW MEXICO

Formerly Southwest Septic

5486 Del Rey Blvd. • Las Cruces, NM 88012 (575) 382-9596

INVOICE
No. 140721

NAME

ADDRESS

PHONE

PLEASE PAY FROM THIS INVOICE, NO STATEMENT WILL BE SENT

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE DATE

DRIVER

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 5% (24 APR).
WE RESERVE THE RIGHT TO REFUSE SERVICE FOR UNPAID BALANCES. THANK YOU.

HORVAC Environmental

Liquid Waste Manifest for DP-1355 Discharge Site

7178 Donphan Dr. P.O. Box 410 Canutillo, TX 79835 Tel:915-877-3117

No. 11522

#	Collection Point Name & Address:	Waste Type:	Volume Gallons	Collection Date:	Discharge Date:	Discharge Time:	Discharge Cell:
1	Sheldon McAdkisson	SL	1000	6-9-	6-9	130	4
2	Frankie						
3	Carlson						
4							
5	Hobo Agoda						

CERTIFICATION:
I hereby declare that liquid wastes identified on this manifest were obtained at the locations and in the volumes as indicated. I certify that the loads have been monitored by odor and visual appearance and to the best of my knowledge these liquid wastes are of the types approved for disposal at the DP-1355 facility.

Transport Driver (Print & Sign) — Date: 6.9.16

11036
Vehicle License Number

Waste Types:
GR = Grease
BR = Brine
SL = Sludge
SE = Septage

Southwest Envirotec NEW MEXICO

Formerly Southwest Septic

5486 Del Rey Blvd. • Las Cruces, NM 88012 (575) 382-9596

INVOICE
No. 140296

NAME

ADDRESS

PHONE

PLEASE PAY FROM THIS INVOICE. NO STATEMENT WILL BE SENT.

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE DATE

DRIVER

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 5% (24 APR).
WE RESERVE THE RIGHT TO REFUSE SERVICE FOR UNPAID BALANCES. THANK YOU.

HORVAC Environmental

SL

Liquid Waste Manifest for DP-1355 Discharge Site

No. 11545

7178 Donphan Dr. P.O. Box 410 Canutillo, TX 79835 Tel:915-877-3117

#	Collection Point Name & Address:	Waste Type:	Volume Gallons	Collection Date:	Discharge Date:	Discharge Time:	Discharge Cell:
1	[illegible]						
2	[illegible]	SL	7000	6.3.	6-3	10	4/5
3	[illegible]		6500	6.3	6.3	1120	4/5
4	[illegible]						
5	[illegible]						

CERTIFICATION:
I hereby declare that liquid wastes identified on this manifest were obtained at the locations and in the volumes as indicated. I certify that the loads have been monitored by odor and visual appearance and to the best of my knowledge these liquid wastes are of the types approved for disposal at the DP-1355 facility.

[illegible] 6.3.16

Transport Driver (Print & Sign) Date

9577 / 5563

Vehicle License Number

Waste Types:
GR = Grease
BR = Brine
SL = Sludge
SE = Septage

Southwest Envirotec NEW MEXICO

Formerly Southwest Septic

5486 Del Rey Blvd. • Las Cruces, NM 88012

(575) 382-9596

INVOICE

No. 140281

NAME [illegible] Middle School

ADDRESS [illegible]

PHONE [illegible]

[illegible]

[illegible] gls [illegible]

[illegible]

[illegible]

[illegible]

PLEASE PAY FROM THIS INVOICE, NO STATEMENT WILL BE SENT

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE [illegible] DATE 6.3.16

DRIVER [illegible]

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 5% (24 APR).
WE RESERVE THE RIGHT TO REFUSE SERVICE FOR UNPAID BALANCES. THANK YOU.

HORVAC Environmental

Liquid Waste Manifest for DP-1355 Discharge Site

7178 Donphan Dr. P.O. Box 410 Canutillo, TX 79835 Tel:915-877-3117

No. 11669

#	Collection Point Name & Address:	Waste Type:	Volume Gallons	Collection Date:	Discharge Date:	Discharge Time:	Discharge Cell:
1	3 Soldiers Grease Trap	SL	3000	3-23	3.23		5/4
2	Treadwell Pla Hi-Sch	SL	3300	3-23	3-23	1130	
3	Wilson Mid School Grease	RL	1500	3-23	323	1230	5/4
4							
5	Wash Hydrolene						

CERTIFICATION:

I hereby declare that liquid wastes identified on this manifest were obtained at the locations and in the volumes as indicated. I certify that the loads have been monitored by odor and visual appearance and to the best of my knowledge these liquid wastes are of the types approved for disposal at the DP-1355 facility.

Transport Driver (Print & Sign) — Date: 3.23.16

905771/11336

Vehicle License Number

Waste Types:
GR = Grease
BR = Brine
SL = Sludge
SE = Septage

Southwest Envirotec NEW MEXICO

INVOICE

No. 139880

Formerly Southwest Septic

5486 Del Rey Blvd. • Las Cruces, NM 88012

(575) 382-9596

NAME Addadem Hischa[illegible]

ADDRESS [illegible]

PHONE [illegible]

3 Lift Stations
1 [illegible] 2300 gal
1 mid
1 [illegible]

1 [illegible] meat Plant
3000 gal

1 midshed lift 1500 gal
750 gal

PLEASE PAY FROM THIS INVOICE, NO STATEMENT WILL BE SENT

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE [signature] DATE 3/22/16

DRIVER [signature]

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 5% (24 APR).
WE RESERVE THE RIGHT TO REFUSE SERVICE FOR UNPAID BALANCES. THANK YOU.

HORVAC Environmental

Liquid Waste Manifest for DP-1355 Discharge Site

7178 Donphan Dr. P.O. Box 410 Canutillo, TX 79835 Tel:915-877-3117

No. 11686

#	Collection Point Name & Address:	Waste Type:	Volume Gallons	Collection Date:	Discharge Date:	Discharge Time:	Discharge Cell:
1	Andrews High School						
2	Frank Ely MS Haw2f			3.14	3.14	1	1
3	Andrews Gardens						
4							
5	V Bob Ranch						

CERTIFICATION:

I hereby declare that liquid wastes identified on this manifest were obtained at the locations and in the volumes as indicated. I certify that the loads have been monitored by odor and visual appearance and to the best of my knowledge these liquid wastes are of the types approved for disposal at the DP-1355 facility.

Transport Driver (Print & Sign)

3.14.16

Date

110906

Vehicle License Number

Waste Types:
GR = Grease
BR = Brine
SL = Sludge
SE = Septage

Southwest Envirotec NEW MEXICO

INVOICE

No. 139841

Formerly Southwest Septic

5486 Del Rey Blvd. • Las Cruces, NM 88012

(575) 382-9596

NAME Anthony Grados Hi-sch...

ADDRESS ...

PHONE Anthony Grados

Po

1 ... grease trap

... 6750

PLEASE PAY FROM THIS INVOICE, NO STATEMENT WILL BE SENT

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE ____________ DATE 3.14.16

DRIVER ____________

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 5% (24 APR).
WE RESERVE THE RIGHT TO REFUSE SERVICE FOR UNPAID BALANCES. THANK YOU.

Southwest Envirotec NEW MEXICO

INVOICE

№ 135071

Formerly Southwest Septic

5486 Del Rey Blvd. • Las Cruces, NM 88012

(575) 382-9596

NAME

ADDRESS

PHONE

Pump Sewer
Treatment Plant
Gadsden Middle
School 6,500 gal

PLEASE PAY FROM THIS INVOICE, NO STATEMENT WILL BE SENT

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE

DATE [illegible]

DRIVER

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 2% (24 APR) ON ALL UNPAID BALANCES! TOTAL DUE UPON RECEIPT. THANK YOU.

Southwest Envirotec NEW MEXICO

INVOICE
No. 138649

Formerly Southwest Septic
5486 Del Rey Blvd. • Las Cruces, NM 88012
(575) 382-9596

NAME Gadsden Hi school
ADDRESS [illegible]
PHONE [illegible]

From Gadsden Middle
to Hi school
4 X 3500 gals

[illegible]
7-2-2015

PLEASE PAY FROM THIS INVOICE, NO STATEMENT WILL BE SENT

TOTAL DUE UPON RECEIPT

• Customer understands Southwest Envirotec will not be responsible for contaminated loads •

SIGNATURE

DRIVER ______ DATE

White - Office • Yellow - Customer • Pink - Control

UNPAID BALANCES ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF 5% (24 APR).
WE RESERVE THE RIGHT TO REFUSE SERVICE FOR UNPAID BALANCES. THANK YOU.