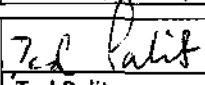
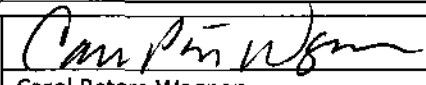


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	03/22/2018		
Media:	Water (CWA)		
Regulatory Program(s)	NPDES		
Company Name:	Cannon Air Force Base, NM		
Facility Name:	Wastewater Treatment facility at Cannon Air Force Base, NM		
Facility Physical Location:	100 South D.L. Ingram Blvd, Cannon Air Force Base, in Curry County, NM		
(city, state, zip code)	Cannon Air Force Base, NM 88103		
Mailing address:	506 D.L. Ingram Blvd, Cannon Air Force Base, NM 88103		
(city, state, zip code)	Cannon Air Force Base, NM 88103		
County/Parish:	Curry County		
Facility Contact:	Lyla Granfield	Environmental Protection Specialist	
	575 904 3233		
FRS Number:	110042049262		
Identification/Permit Number:	NM0030236		
Media Number:			
NAICS:			
SIC:	4952- Sewerage Systems		
Facility Representatives:	Norman Boyce	Contract Officer Representative	575 784 2105
EPA Inspectors:	Ted Palit, P.E.		214 665 8061
	David Esparza, P.E.		505 366 8402
State Inspector(s):			
Other Inspector(s):			
Metadata	Title:	Cannon Air Force Base, New Mexico	
	Author:	US EPA Region 6 Compliance Assurance and Enforcement Division Dallas TX	
	Subject:	Inspection Report, Clean Water Act (CWA), National Pollutant Discharge Elimination System(NPDES)	
	Keywords:	Wastewater Treatment Plant, Sludge disposal, Publicly Owned Treatment Works (POTW)	
EPA Lead Inspector Signature/Date	 Ted Palit		6/11/18 Date
Supervisor Signature/Date	 Carol Peters-Wagnon		6/11/18 Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

On May 22, 2018, I, Ted Palit and David Esparza arrived at the wastewater treatment facilities owned and operated by the Cannon Air Force Base (Base) in the State of New Mexico. The plant facilities are located at 100 South D.L. Ingram Blvd, Cannon Air Force Base, in Curry County, New Mexico. Ted Palit and David Esparza arrived at the plant facilities at about 9 AM and met with Lylya Granfield, Environmental Protection Specialist and Norman Boyce, contract Officer representative. Upon arrival we presented our credentials and explained the purpose and the extent of our inspection activities.

The Base's current NPDES permit allows it to discharge treated effluent to receiving waters named North Playa Lake (Outfall 001) and Golf Course Pond (Outfall 002). On October 18, 2017, the Permittee wrote to EPA that discharge from the waste water treatment plant of the Base to the North playa Lake and the Golf Course pond are isolated and are not part of the waters of the United States. On February 02, 2018, based on all available information reviewed, EPA Region 6 concurred that the above referenced water bodies are isolated, intrastate waters with no known nexus to interstate commerce. As such, Base's NPDES permit has been declared discontinued and void. A copy if Region 6's letter is attached in Appendix 1.

However, since the Base prepares sewage sludge generated during the treatment of domestic sewage in a treatment works which must be managed and disposed, the base is subject to the provisions in Part 503. We explained to the Base personnel that the purpose of our inspection is to evaluate the compliance status of the requirements of 40 CFR Part 503 – Standards for the Use or Disposal of Sewage Sludge.

FACILITY DESCRIPTION

The wastewater treatment plant (WWTP) is a sequencing batch reactor (SBR) type activated sludge process with preliminary treatment facilities including raw waste water screw pumps, mechanical bar screen, auger monster screen, packaged headworks unit and influent pump station. The SBR consist of three 55 ft x 55 ft reactor basins with side water depths of 13 ft minimum to 18 ft maximum. Components of SBR include an aeration system, mixing system, decanter, and sludge wasting pumps. Disinfection is achieved by effluent dechlorinating. Waste sludge is aerobically digested and dried in beds. Dried sludge is composted and disposed either in a municipal solid waste landfill or land applied. A topographic map of the WWTP site is attached in Appendix 2 and a process flow diagram is attached in Appendix 3.

Section II – OBSERVATIONS

Effluent from the waste water treatment plant is discharged to the North Playa Lake which is adequately sized to accommodate the flow from the plant. In addition, the Base has provision to store effluent at the Golf Course Pond.

Section III – AREAS OF CONCERN

The Base has adequate capacity to store treated, dried, and composted sludge at the plant site before it could be disposed to a municipal solid waste landfill or land applied. However, storing sludge for a prolonged period of time could cause concern to meet regulatory compliance. Sludge remaining on the land (plant site) for longer than two years shall demonstrate compliance with the provisions of Part 503.20(b)(1)–(5) and shall not be allowed to contaminate surface or ground water accordingly.

Section IV – FOLLOW UP

N/A

Section V – LIST OF APPENDICES

Appendix 1 – Copy of Region 6's Letter for Discontinuation of NPDES Permit Requirements

Appendix 2 – A Topographic Map of Wastewater Treatment Facilities

Appendix 3 – Copy of Process Flow Diagram of Wastewater System Facilities

Appendix 1 – Copy of Region 6’s Letter for Discontinuation of NPDES Permit Requirements



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7015 1520 0003 3990 4762)

Michael E. Conley, Colonel, USAF
Vice Commander
100 Air Commando Way, Suite 100
Cannon AFB, NM 88103-5214

RE: NPDES Application No. NM0030236

Dear Colonel Conley:

According to 40 CFR § 122.1 (b), the NPDES program requires permits for the discharge of pollutants from any point source into waters of the United States (WOTUS). Your letter dated October 18, 2017 states that the discharge from the Cannon Air Force Base (Cannon AFB) wastewater treatment plant to the North Playa Lake (Outfall 001) and Golf Course Pond (Outfall 002) are isolated, and are not part of the WOTUS.

Based on all available information reviewed, EPA Region 6 concurs that the above-referenced water bodies are isolated, intrastate waters with no known nexus to interstate commerce. Therefore, they are not the WOTUS, and are not jurisdictional under the CWA.

You are hereby notified that your National Pollutant Discharge Elimination System (NPDES) permit to discharge the treated wastewater into the Outfall 001 and Outfall 002 has been discontinued and is now void.

Should you again propose to discharge any pollutants from this facility to the WOTUS in the future, it will be necessary to file a new NPDES permit application at least 180 days in advance of the proposed discharge. If you have any questions, please do not hesitate to contact Dorothy Brown at the above address or telephone (214) 665-8141.

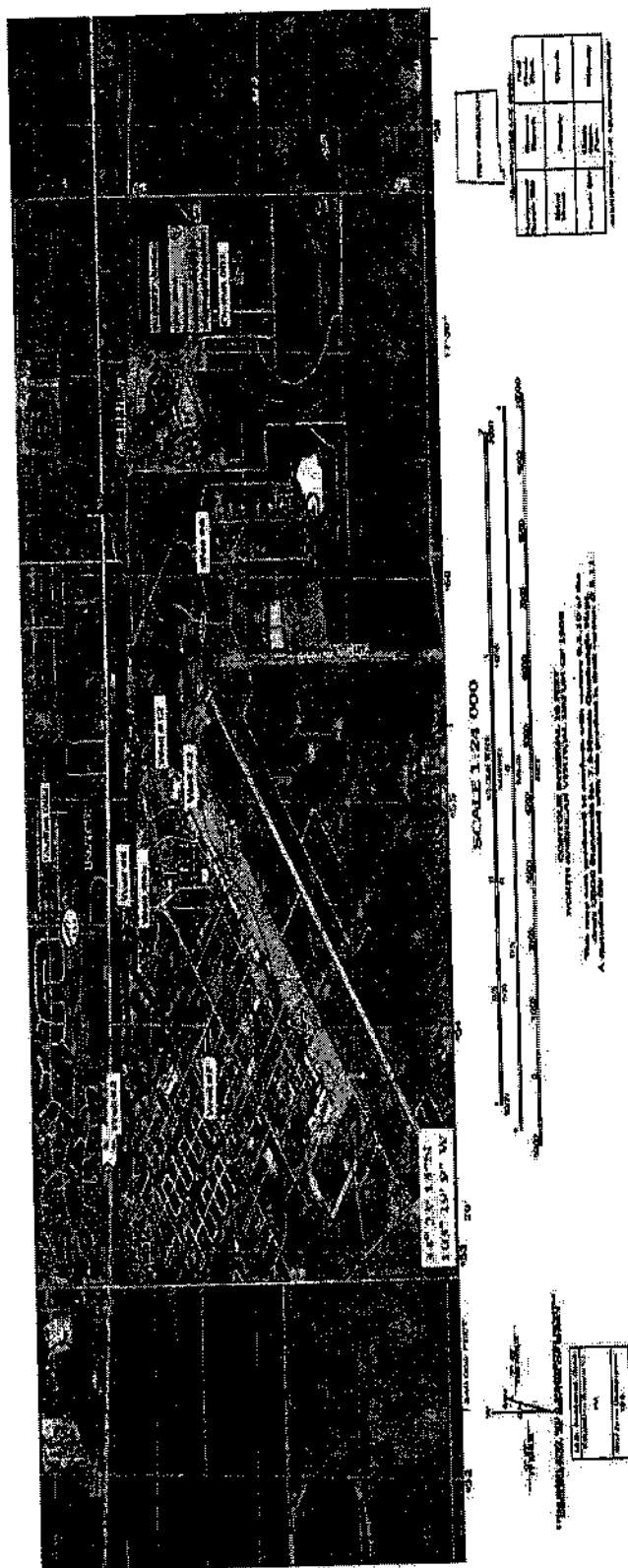
Sincerely yours,


Stacey B. Dwyer, P.E.
Associate Director
NPDES Permits & TMDL Branch

cc: Sarah Holcomb, NMED

Appendix 2 – A Topographic Map of Wastewater Treatment Facilities

Cannon AFB WWTP, NM0030236



RESEARCH AND APPLICATION TRACK.

FONTAINE, NM.
2010

M

**Cannon Air Force Base
EPA permit Renewal January 2013**

HDR, Inc. | Attachment

Appendix 3 – Copy of Process Flow Diagram of Wastewater System Facilities

