

## TOWN OF EDGEWOOD

*Where the Mountains Meet the Plains*

1911 Historic Route 66  
P.O. Box 3610  
Edgewood, NM 87015  
Phone: (505) 286-4518 Fax (505) 286-4519  
[www.edgewood-nm.gov](http://www.edgewood-nm.gov)

October 12, 2018

Attn: Kellie Jones  
New Mexico Environment Department  
Groundwater Quality Bureau  
PO Box 5469, Santa Fe, NM 87502-5469

RE: Responses to the Notice of Violation – Town of Edgewood  
Wastewater Treatment Plant, DP 1654

Dear Ms. Jones:

The Town of Edgewood (Town) would like to express our thanks and appreciation to the New Mexico Environment Department for the sit-down meeting on September 18, 2018 with yourself and Melanie Sandoval.

We at the Town can assure NMED that we will be proactive in our efforts to meet the required conditions set forth in the Notice of Violation. Over the past two and a half years the current administration has worked very hard to address issues and problems at the Wastewater Treatment Plant (WWTP). The Town has hired Mike Butler, a contract operator through Rocky Mountain Water and Wastewater, and Mike Garcia, an employee hired by the Town. Together, they took over operations of the plant from the previous operator, EPCOR, who was relieved of their duties, February 1<sup>st</sup>, 2018. Also, the Town hired HDR Engineering who completed a Preliminary Engineering Report for the WWTP through the NMED Construction Programs Bureau (CPB) in 2018. Following the completion of that report, several upgrades were made at the WWTP using State Appropriations through the NMED-CPB including a new SCADA system, two refrigerated samplers, upgrades and repairs for the belt press, overhaul of an existing blower, and various minor repairs and other modifications.

Below are our responses, in order, to the Notice of Violation letter received on September 5, 2018 and per our meeting with you and Ms. Sandoval on September 18, 2018.

1:

a)

- Mayor John Bassett, Town of Edgewood, PO Box 3610, Edgewood, NM 87105

John Bassett  
Mayor

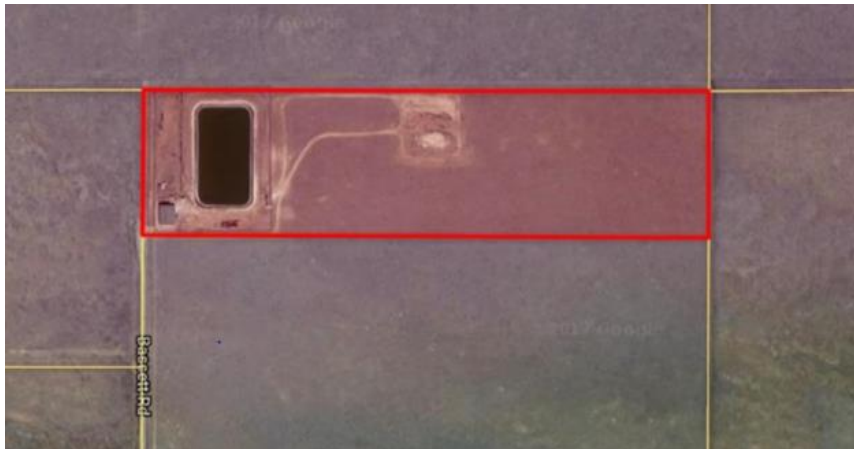
Sherry Abraham  
John Abrams  
Linda Holle  
Audrey Jaramillo  
Town Councilors

Juan Torres  
Clerk-Treasurer

Carla Salazar  
Deputy Clerk

William H. White  
Municipal Judge

- Operators: Mike Butler (contract operator through Rocky Mountain Water and Wastewater) and Mike Garcia, employee, (Town of Edgewood).
- Town of Edgewood Wastewater Treatment Plant; 170 Bassett Blvd, Edgewood, NM 87105
- There was no illegal discharge, the discharge was on the Town of Edgewood property. The treated effluent was discharged through a fence, just east of the pond, but the overall property (41.46 acres) is owned by the Town (see the red outline). See the attached image after the letter. The Town had thought the previous operator, EPCOR, had notified the NMED of their plan to discharge to the adjacent Town property to minimize the volume in the pond.



- The discharge is treated effluent from the pond. The Town has proposed a permanent reuse irrigation system via center-pivot sprinklers, hand-move, or solid-set, pending additional funding by the NMED.
  - See the latest test results after the letter.
  - It is estimated that approximately 3,200,000 has been discharged over 81 days.
  - There is no damage, all treated effluent was contained onsite. The current pond level is so low there will be no need to discharge from the pond until after the renewal of the discharge permit which will include an alternative disposal method.
- b) See the attached photo showing that the hole in the fence has been repaired.



c) See the attached photo showing that the additional ponding areas have been dewatered and are in the process of being backfilled and regraded.



d) As stated above, there was no illegal or unauthorized discharge. The Town thought NMED was notified of the discharge of the treated effluent. The Town has proposed a permanent reuse irrigation system via center-pivot sprinklers, hand-move, or solid-set, pending additional funding by the NMED. In addition, the original design was to add additional effluent storage ponds as the flows increase via 50,000 gpd increments. This won't be required for several years but will occur sometime in the future. The current level of the pond is about 3ft which gives us approximately 6 million gallons of storage remaining. We are producing about 30-35K gallons a day. The town is currently using up to 50K gallons per day for dust suppression and is in the process of purchasing a second water truck, so this number will go up. We will not need to discharge from the pond in any manner other than dust suppression on the roads until after the renewal of the discharge permit and an alternative disposal method has been determined.

2: Until the Town received your letter of September 5<sup>th</sup> the current administration was unaware of the timelines which were originally set out back in September of 2015 in a letter to then Town Administrator Steve Shepherd. The previous operator of the plant, EPCOR, had not notified the current administration of the letter or the timelines contained in it. The Town can assure NMED that going forward we will be proactive to meet the required conditions.

The Town will work with HDR Engineering to develop a path forward on a new permanent reuse irrigation system and will likely be under contract by November 1, 2018 but the exact design will not be known until funding is procured. Additional funding for the proposed permanent reuse irrigation system will have to be acquired this fall or through the state legislature in early 2019. The Town would like to extend the written proposal date until adequate funding can be identified. Bidding and award to a qualified contractor is anticipated to take two months and construction will likely take up to two months.

The reuse irrigation system via center-pivot sprinklers, hand-move, or solid-set, pending additional funding by the NMED. In addition, the original design was to add additional effluent storage ponds as the flows increase via 50,000 gpd increments. This won't be required for several years but will occur sometime in the future.

All plans and specifications can be completed in 2018 and construction can be completed by the November 1, 2019 deadline pending funding.

3: Until the Town received your letter of September 5<sup>th</sup> the current administration was unaware of the timelines which were originally set out back in September of 2015 in a letter to then Town Administrator Steve Shepherd. The previous operator of the plant, EPCOR, had not notified

the current administration of the letter or the timelines contained in it. The Town assures the NMED that we will be proactive to meet the required conditions.

The Town will work with HDR Engineering to develop a path forward on a new impervious surface for the dewatered sludge via a concrete compost pad and/or concrete sludge drying bed. HDR will likely be under contract by November 1, 2018 but plans and specifications won't be completed by October 1, 2018. The Town would like to extend this design deadline until November 30, 2018. However, depending on winter conditions, construction will likely to extend into spring of 2019. Bidding and award to a qualified contractor is anticipated to take two months and construction will likely take one month. A temporary liner, portable containers, and/or sludge bags to hold the sludge will be used until the new construction can be completed.

All plans and specifications can be completed in 2018 and construction can be completed by the June 30, 2019 deadline pending funding. After the concrete compost pad and/or concrete sludge drying bed has been constructed, the Town will meet Class A sludge limits per 40 CFR 503 requirements. The Class A sludge is compost and can be disposed of at the Estancia Valley Solid Waste Authority or can be beneficially used as compost for parks and/or agriculture.

- 4: A minimum of 2 feet of freeboard between the liquid level of the impoundment and the elevation of the impoundment liner has never been reached under the current operators. Current operation of the pond, which can hold 7.5 million gallons has about 3 feet of water with a maximum depth of 10 ft.
- 5: Until the Town received your letter of September 5<sup>th</sup> the current administration was unaware of the timelines which were originally set out back in September of 2015 in a letter to then Town Administrator Steve Shepherd. The previous operator of the plant, EPCOR, had not notified the current administration of the letter or the timelines contained in it. The Town assures the NMED that we will be proactive to meet the required conditions.

Enviroworks, LLC from Edgewood, an NMED approved Special Waste Hauler for sludge, will haul any of the existing sludge to the Estancia Valley Solid Waste Authority. The Town is working with Enviroworks, but because of their schedule, may not be able to remove the sludge until after the October 1, 2018 deadline. In addition, the Town will contract with HDR to complete a sludge disposal plan that will be submitted to NMED for review and approval. The Town would like to extend this deadline until November 30, 2018 pending NMED approval of the sludge disposal plan.

In addition, the Town and Hall Environmental will do sampling as identified in the Notice of Violation.

The results of the soil sampling will be submitted by November 1, 2018.

- 6: The Town will comply with all testing requirements per the NMED and the associated DP-1654. The UV transmissivity is no longer applicable since UV is no longer used at the plant. When the DP-1654 is renewed, this will be noted as well.

Thank you for your cooperation and help in association with DP-1654. Please let us know if you have any further questions, comments, or concerns.

Sincerely,

A handwritten signature in black ink that reads "John Bassett". The signature is written in a cursive style with a large initial "J".

Mayor John Bassett  
Town of Edgewood

Cc: Ed DuBois, HDR Engineering  
Mike Butler, Rocky Mountain Water and Wastewater  
Mike Garcia, Town of Edgewood  
Carla Salazar, Town of Edgewood