

Notice of Violation Council Update

Mike Butler, Chief Plant Operator

September 2019

The Wastewater Department is continuing its efforts to correct the issues identified in the Notice of Violation (NOV) issued on September 5, 2018. The NOV consisted of six findings, all findings are being addressed by the following;

1. The unauthorized discharge of treated effluent through a hole in the fence to temporary unlined ponds.
 - No further discharge has occurred
 - The hole in the fence has been repaired
 - The temporary ponds have been backfilled and regraded
2. Submittal of plans for an emergency impoundment or alternative disposal, with construction to follow, completed by September 3, 2016.
 - Plans for an alternative disposal (irrigation system) have been submitted and approved by Ground Water Quality Bureau.
 - Construction of the alternative disposal (irrigation system) should begin shortly.
3. Submittal and construction of an impervious surface (drying bed) with construction to follow, completed by March 2, 2016.
 - A temporary drying bed has been constructed of a single piece of liner leftover from the construction of the pond.
 - The engineering firm Bohannon Huston Inc. has been contracted to design a permanent drying bed, with construction to follow.
4. A minimum of two feet of freeboard between the liquid level and the top of the pond.
 - The mechanical evaporator has been repaired and is currently in use to help evaporate the treated effluent.
 - The Road Department has been running both water trucks, doubling the amount of treated effluent used for dust suppression on the Towns roads
 - When completed the irrigation system will aid in lowering the pond level for winter storage.
5. Solids removed from the plant were being placed directly on the ground, and not contained to prevent leachate from percolating into the ground.
 - All solids have been removed, and soil samples at the specified depths have been submitted to NMED.
 - A disposal Management Plan has been submitted and approved by Solid Waste Bureau to haul solids to the landfill
 - The Wastewater Department is now a certified Special Waste Hauler

- The belt press that dewateres the solids from the plant has been refurbished, drying the solids to a liquid percentage that we can haul directly to the landfill.
 - The drying bed will allow us to store solids as needed
6. The analytical results from the lab were not submitted with the monitoring report starting in July of 2017, also the reports indicated E. coli was being sampled for instead of fecal coliform.
- All analytical results from the lab have been submitted with subsequent reports.
 - All samples have been for fecal coliform

The Wastewater Department has been working closely with NMED to insure all findings in the NOV are either already resolved or are working towards a resolution. We anticipate continued progress moving forward.

Bohannon Houston Inc. is working on a plan to upgrade the headworks at the plant to include new screens and influent meter. Also addressing the other issues in the Tech Memo.

The Wastewater Plant was inspected by NMED Ground Water Quality Bureau on June 25, 2019. The included Inspection Report shows the progress made toward addressing the findings of the NOV. Also included is the email approving the design of the irrigation system.