CMOM ANNUAL REPORT FY2015

September 30, 2015

Albuquerque Bernalillo County
Water Utility Authority

Contents

Capacity, Management, Operations and Maintenance (CMOM) Plan Overview

In accordance with National Pollutant Discharge Elimination System (NPDES) Permit No. NM0022250 (Permit), the Albuquerque Bernalillo County Water Utility Authority (Water Authority) prepared a Capacity, Management, Operations and Maintenance (CMOM) Plan with Emphasis on the Fats, Oils and Grease (FOG) Policy. The effective date of the Water Authority's permit is October 1, 2012.

The CMOM Plan consists of the following documents:

1. FOG Policy
2. CMOM Annual Report
3. CMOM Program Self-Assessment

The FY2015 CMOM Annual Report follows previous FY2013 and FY2014 reports. All three reports can be accessed at http://www.abcwua.org/Sewer_System.aspx.

Report Purpose

As indicated by its name, the CMOM Annual Report will be reissued to describe CMOM activities in the previous fiscal year (July 1 to June 30). This CMOM Annual Report covers July 1, 2014 to June 30, 2015. The CMOM Annual Report provides summary descriptions of CMOM activities (past and planned) and is intended to be a communication tool. The report is intended for Water Authority staff, regulatory authorities, customers, and the general public.

Permit Requirements

The Water Authority discharges to the Rio Grande under authority of NPDES Permit No. NM0022250 (Permit). Under this Permit, the Water Authority operates the Southside Water Reclamation Plant (SWRP) and the Collection System. The following are the Permit requirements that impact the collection system.

1. The Water Authority must submit a (monthly) Discharge Monitoring Report (DMR) in tabular form for all overflows. (Part I, Paragraph C.6).
2. The Water Authority must develop a Capacity, Management, Operation and Maintenance (CMOM) Plan with emphasis on the Fats, Oils and Grease (FOG) Policy. The FOG Policy will be a re-evaluation of the existing FOG Sewer Use and Wastewater Control (SCO) Ordinance. The goal of the FOG Policy will be to reduce Sanitary Sewer Overflows (SSOs). The FOG Policy may address such items as an inventory of repeat Food Service Establishments (FSE) sources of SSO and routine grease trap inspection programs at FSE with increased frequencies at repeat FOG SSO FSEs. Additional elements of the FOG Policy may be sewer line inspections, such as video recording and required sewer line cleaning activities if warranted at repeat sites.

A minor modification was made to the Permit effective January 12, 2015 that deleted the need to notify USFWS of spills. The modification is attached as Appendix 11.

Administrative Order

The Water Authority received an Administrative Order (AO) from EPA on July 22, 2014 (Appendix 4) and the Water Authority provided a response on September 3, 2014 (Appendix 5). The AO addressed issues at the Southside Water Reclamation Plant (SWRP) and the Collection System. Relative to the Collection System, the AO alleged unauthorized discharges (SSOs). Attachment C of the AO is a listing of alleged Unauthorized Discharges.

In the response, the Water Authority identified exceptions and corrections to Attachment C. The Water Authority requested a meeting with EPA to discuss the ongoing improvements being made to address the issues in the AO and to answer any questions related to the allegations in the AO. The meeting took place on October 30, 2014.

EPA Sanitary Sewer Compliance Inspection – September 2012

As described in the FY2013 CMOM Plan and Annual Report: 1) EPA audited the Water Authority on September 25-26, 2012 with an exit interview on September 26, 2012; 2) The Water Authority developed and submitted to EPA a Corrective Action Plan (CAP) which was followed as described in the FY2013 and FY2014 CMOM reports.

The Water Authority and EPA met on October 30, 2014 at which time it was found that the Water Authority was unaware that the EPA had completed an Inspection Report for the 2012 Audit. The report was provided to the Water Authority on October 30, 2014 and on January 13, 2015 the Water Authority submitted a response. Appendices 6 and 7 respectively are the "Sanitary Sewer Compliance Inspection Report" and the "Response to Sanitary Sewer Compliance Inspection Report."

As described in the Response to Sanitary Sewer Compliance Inspection Report, nearly all the issues raised in the Audit Report had been identified in the exit interview and included in the CAP and as described in the FY2013-15 CMOM reports, have been followed up on by the Water Authority. Through a review of the Sanitary Sewer Compliance Inspection Report some points of emphasis were identified, e.g. develop and implement written standard operating procedures (SOPs). These are addressed under Identified Gaps in the Water Authority Processes with Recommendation to Close.

Administrative Complaint

The Water Authority received an Administrative Complaint (AC) from EPA on June 9, 2015 (Appendix 6) and the Water Authority provided a response on July 14, 2015 (Appendix 7). The AC addressed issues at the Southside Water Reclamation Plant (SWRP) and the Collection System. Relative to the Collection System, the AC alleged unauthorized discharges (SSOs) and provided a listing of alleged Unauthorized Discharges.

In the response, the Water Authority submitted a revised listing of unauthorized discharges from January 2011 through February 2015. This includes all spills of less than 50 gallons which prior to October 1, 2012 were not originally reported by the Water Authority.

CMOM Program Self-Assessment

EPA states (see http://www.epa.gov/npdes/pubs/cmomselfreview.pdf): "An important component of a successful CMOM program is to periodically collect information on current

systems and activities and develop a "snapshot-in-time" analysis. From this analysis, the utility establishes its performance goals and plans its CMOM program activities." The Water Authority developed Self-Audits as a part of the FY2013 and FY2014 reports. Because the data provided in the Self-Audit does not significantly change year-to-year, the next update will coincide with the FY2019 CMOM Report.

FOG Policy

The Water Authority's FOG Policy is a separate document. The FOG Policy was developed as a requirement of the NPDES Permit effective on October 1, 2012. The policy was developed to work in conjunction with the Water Authority Sewer Use and Wastewater Control Ordinance (SUO) and Enforcement Response Plan (ERP) to reduce the rate of SSOs in the collection system and decrease FOG loading at the SWRP. The policy describes expectations for FOG dischargers such as Food Service Establishments (FSEs) and waste haulers, and the steps the Water Authority is taking to mitigate FOG.

The FOG Policy sets a Water Authority goal of inspecting every FSE once every three years. Details of what is expected of the FSE in terms of Grease Removal System (GRS) functionality, pumping schedule, maintenance, and recordkeeping are identified. The FOG policy explains the Water Authority use of the 25% solids and grease rule (25 Percent Rule) to determine if a GRS is filled to capacity. The policy also contains Best Management Practices (BMPs) such as scraping plates, using screens, and not using emulsifiers, etc.

Pumper requirements are also covered in the FOG Policy. Full evacuation of a GRS is required each time pumping occurs. The pumper must leave the FSE documentation in the form of manifests that contain pertinent information such as date, time, volume pumped, and the condition of the GRS. The FOG Policy lists the minimum service to be provided by the pumper.

Enforcement of FOG violations and hauled wastewater violations is described in the FOG Policy. The FOG Policy works in conjunction with the ERP to set administrative assessments for violations.

The FOG Policy also sets forth the process for identifying new sources of FOG. The Water Authority Pretreatment Program will update the FOG database on an annual basis. The FOG Policy sets a goal that the Water Authority will meet with the City of Albuquerque, Bernalillo County, the Village of Los Ranchos, the Village of Corrales, plumbers, and the New Mexico Restaurant Association on a semiannual basis to discuss FOG issues.

In developing the FOG Policy, the Water Authority held a meeting with the hauled wastewater permit holders on July 22, 2013 and a public meeting on July 25, 2013 to discuss the proposed Policy. The final FOG Policy was submitted to the EPA on September 27, 2013 and updated in the Pretreatment Program modification documents sent to EPA on June 2, 2014. No comments from EPA were received regarding either submission.

FOG Enforcement

In FY2015, the Water Authority Pretreatment Program conducted 1,419 FSE inspections with 1101 passing and 318 failing for a compliance rate of 78%. Of the 318 failing inspections, 113 FSEs corrected the deficiencies and called for a re-inspection within seven (7) days. The

remaining 205 FSEs did not take corrective action and thus were issued Notices of Violation (NOVs) of which 57 were for no GRS, 69 were for non-functioning GRS, 12 were for GRS needs pumping, and 67 were for missing manifests.

In response to SSOs, 17 FSE inspections were conducted with eight (8) failing. Within the seven- (7) day grace period, one (1) FSE corrected the deficiency. After the seven- (7) day grace period, seven (7) NOVs were issued. In addition, Water Authority Pretreatment personnel distributed FOG brochures to FSEs, single-family residences and apartment complexes upstream of the SSOs.

SSO Analyses

Permit Requirements

The Permit requires a CMOM Plan with an emphasis on FOG Policy. The Plan goal is to reduce impacts on the sewer system caused by FOG and the Policy goal is to reduce SSOs. The FOG Policy states that the Pretreatment Program will investigate all SSOs related to large amounts of grease. The policy is to take enforcement actions for violations of FOG requirements with priority on FSEs causing repeat SSOs.

SSO Study Team

To meet these requirements, the Water Authority created an SSO Study Team. The Team is comprised of:

1. Collection Section – Assistant Superintendent, Close Circuit Television (CCTV) Supervisor, and Research Analyst;
2. NPDES Pretreatment –Industrial Pretreatment Engineer and Pollution Prevention Specialist.

The Mission Statement for the Study Team is: *The SSO Study Team will work inter-divisionally to study, analyze and determine causes of previous SSOs to mitigate future SSOs in the Collection System.*

The Study Team procedure is:

1. Tabulate all 10-40s, 10-42s and 10-48s (see Table 1 for definitions).
2. Ensure all segments responsible for causing 10-42s and 10-48s are televised.
3. The Research Analyst will review and analyze all CCTV inspections to determine causes (if possible) and document findings.
4. To conduct meetings with the SSO Study Team to review and analyze CCTV that needs further investigation for resolution.
5. Recommend/implement and document mitigations (if possible) based on analysis.
6. Coordinate with NPDES Pretreatment concerning grease issues discovered during analysis.

Table 1 Sewer Trouble Definitions

Sewer Trouble Definitions		
10-40	Sewer Backup	A gravity line blockage that does not result in a spill, or in the vacuum system, a low vacuum (low vac) that causes a customer service disruption. Does not result in an SSO Reportable (10-42) or a Property Damage (10-48).
10-42	SSO Reportable	An overflow of sewage from the system that may impact surface waters. These are reported to the EPA and other locally impacted stakeholders.
10-48	Property Damage	An overflow of sewage from the system that results in damage to private property. These are not reportable under current definitions.

Appendix 1 identifies all 10-42s and 10-48s, and the overflows that resulted in both a 10-42 and a 10-48. When documenting the number of Sewer Troubles of different types, for example in Figure 1, the 10-42 item includes all overflows that may impact surface waters, including those that also had property damage; the 10-48 item includes overflows that only resulted in property damage. This prevents double-counting the number of overflow occurrences.

All 10-40s, 42s and -48s were CCTV inspected, although only 10-42s are "reportable", i.e., required to be reported to the EPA, et al. All 10-42s and -48s were then examined by the Study Team and a Cause and Mitigation were determined.

Table 2 Types of Causes for SSOs

Cause(s) of SSO from DMR		Causes determined from CCTV
CO - Construction	**DB** - Debris	**SC** - Surcharged
CU-Cause Unknown	**RK**-Rocks	**SL** - Sag in Line
EQ - Equipment Failure	**GR** - Grease	**IT** - Intruding Tap
SGG-Sand, grit or gravel	**RT** - Roots	**MH** - Manhole
LF - Line Failure	**RN** - Rainfall	**OJ** - Offset Joint
V - Vandalism	**RGS**-Rags	
RGR - Roots / Grease	**BP**-Burped	

Causes & Mitigations

The Cause(s) were selected from the above table that identifies SSO causes from the DMR and CCTV. The monthly SSO DMR has a specific list of Causes that are based on system observations made by an Operator or Supervisor at the site of an SSO. The CCTV data provided to the Study Team often results in a different, more refined Cause or Causes. Table 3 provides the causes determined by the Study team for FY2015. (Note: The total is less than 100% due to rounding).

Table 3 Summary of Causes from SSO Study

FY2015 10-42, 10-48 Causes	Total	% of Total
Burped	5	7%
Construction	1	1%
Cause Unknown	3	4%
Debris	4	6%
Debris/Rocks	2	3%
Equipment Failure	8	12%
Grease	13	19%
Line Failure	5	7%
Offset Joint	3	4%
Roots	22	32%
Roots/Surcharged	1	1%
Surcharged	1	1%
Grand Total	**68**	**100%**

Mitigations are the steps that the Team identified to prevent a recurrence of an SSO, at least for the identified Cause. Specific Mitigations are very dependent on the conditions observed from the CCTV video and report. Table 4 provides a summary of the various Mitigations. (Note: The total is less than 100% due to rounding). The Mitigations are tracked through completion or implementation.

Table 4 Summary Mitigations from SSO Study

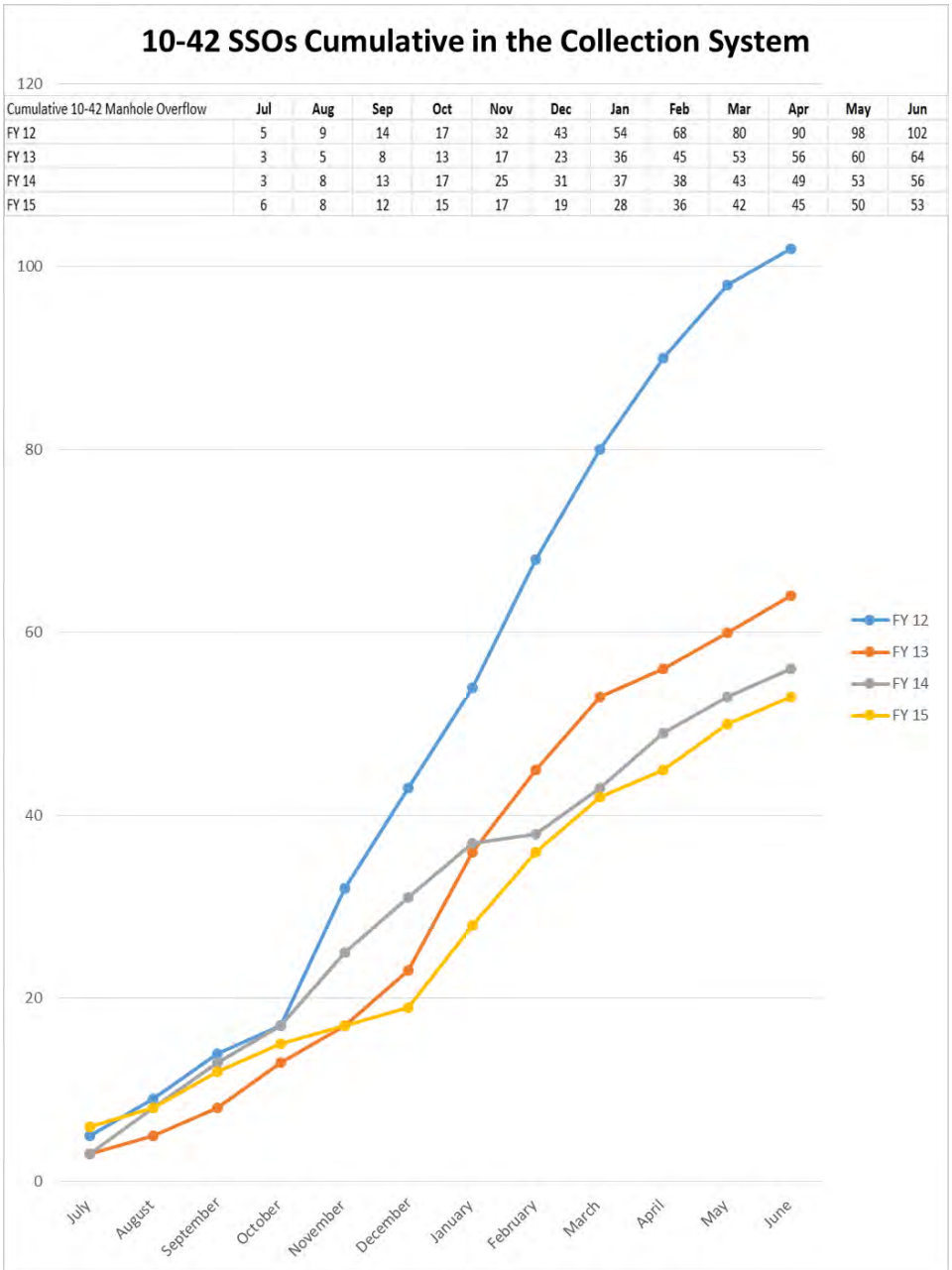
FY2015 10-42, 10-48 Mitigations	Total	% of Total
No Follow Up Needed	9	13%
Pretreatment Notified	2	3%
Pretreatment Notified/Short Interval	2	3%
Pretreatment Notified/Special Instructions	2	3%
Root Foamed	1	1%
Rehab or Replace	11	16%
Rehab or Replace/Pretreatment Notified	2	3%
Special Cleaning	1	1%
Short Interval	2	3%
Special Instructions	28	41%
Special Instructions/Pretreatment Notified	1	1%
Special Instructions/Root Foamed	2	3%
Special Instructions/Short Interval	3	4%
Special Instructions/Short Interval/Pretreatment Notified	1	1%
Special Instructions/Short Interval/Pretreatment Notified/Rehab or Replace	1	1%
Grand Total	**68**	**100%**

SSO Tabulation & Analysis

Appendix 1 contains a list of every 10-42 and 10-48 event in FY2015. The table columns are grouped as follows:

1. The type, i.e., 10-42 or -48, is identified on the left. In some cases a single event was both a 10-42 and a 10-48, as indicated.
2. Next to the right are the data included in the monthly SSO DMRs. It is noted that a "Reported Cause" is listed. This is typically based on the observations of the Operator that reported the SSO.
3. Next to the right is data determined by the Study Team:
    a. Cause
    b. Mitigation
    c. If Pretreatment follow-up is necessary
4. To the far right are follow-ups by NPDES Pretreatment
    a. FSEs visited
    b. Notice of Violation issued

Figure 1 shows the cumulative 10-42s by month for FY2012-15. This figure includes previously not reported spills of less than 50 gallons for the period prior to October 1, 2012. This is per the revised data as submitted in the Response to Administrative Complaint (Appendix 9).



Cumulative 10-42 Manhole Overflow	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
FY 12	5	9	14	17	32	43	54	68	80	90	98	102
FY 13	3	5	8	13	17	23	36	45	53	56	60	64
FY 14	3	8	13	17	25	31	37	38	43	49	53	56
FY 15	6	8	12	15	17	19	28	36	42	45	50	53

Figure 1 FY2015 Sewer Trouble

The SSO Rate is defined as 100 times the number of SSOs in a year divided by the miles of sewer in the system. The Water Authority system has a total of approximately 2,414 miles of line (p. 8 of the Self-Audit). The SSO rate is therefore 4.5, 2.8, 2.5, and 2.3 for FY2012-15 respectively.

Figure 2 shows the total sewer troubles, i.e. 10-40s, -42s, and -48s by year for FY2012-15.

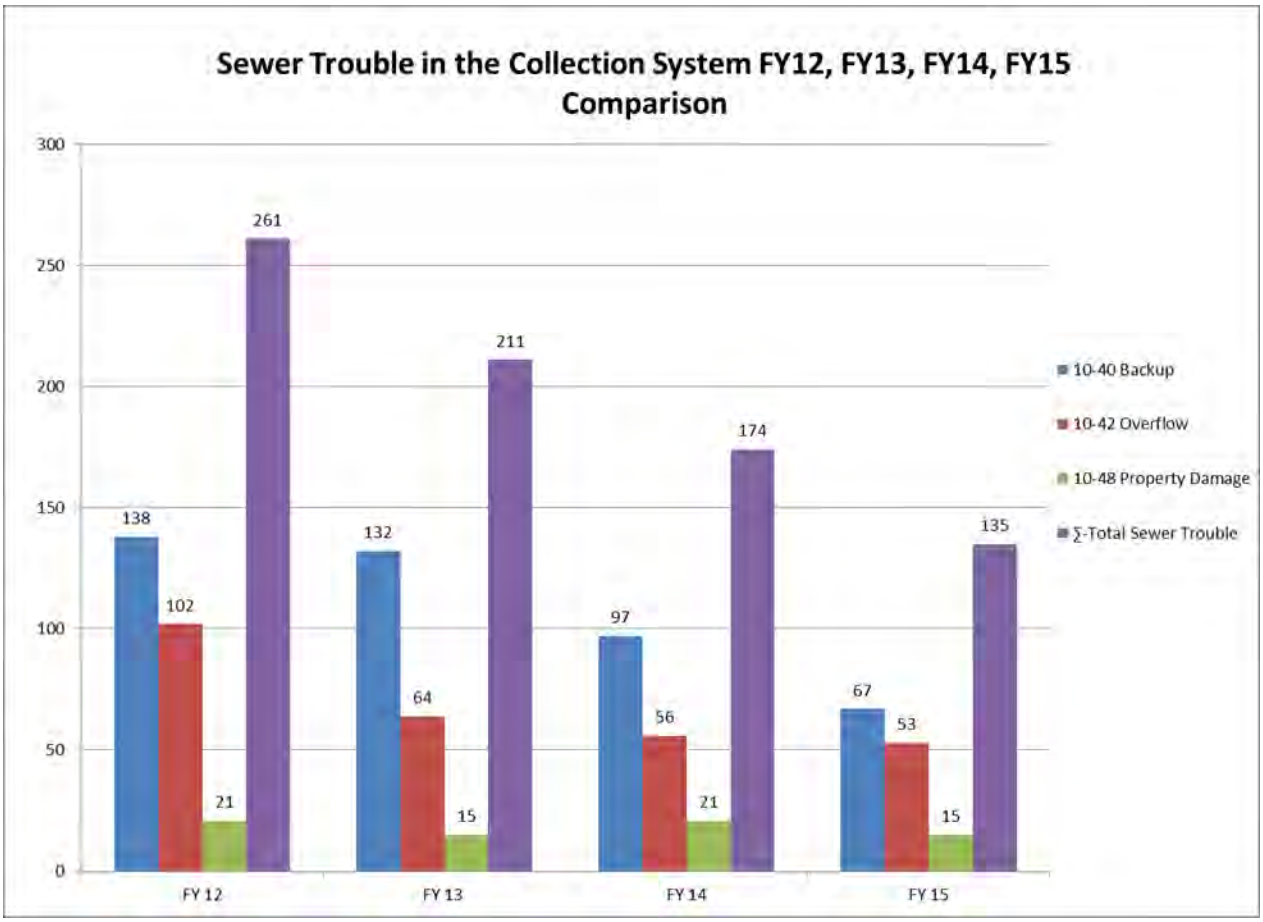


Figure 2 Sewer Trouble Comparison

Volume Spilled and Recovered

Via the OERP, the Water Authority has implemented a policy of capturing spills and documenting actions. Appendix 2 provides estimated spill volumes and volumes recovered for the 53 reported SSOs for FY2015. In FY2015, it is estimated that approximately 98% of the sewage spilled was captured. Of the 48,012 gallons estimated not to be recovered, none was identified as directly reaching the Rio Grande.

Actions Implemented and On-Going Programs

General

The following are gaps that were identified in the FY2014 CMOM Report and were closed in FY2015, or are on-going programs, or both. In addition to the commitments made in the FY2014 CMOM Report, the following additional actions were taken to expand the Water Authority's ability to operate and maintain the system.

1. Through a third-party contract, arc flash studies of the Collection System lift and vacuum stations were completed in FY2015, resulting in improved O&M processes. In addition, required maintenance was identified and is being performed in FY2016. This will increase the safety and reliability of these stations.
2. Through third-party contract, replaced and upgraded obsolete PLCs at four lift stations. This will increase the reliability of these stations.
3. Completed in-house study of the capacity of unlined concrete interceptors to determine which can be rehabbed using slip-lining and which must be rehabbed by replacement or cured-in-place pipe (CIPP). Emergency slip-lining is frequently only marginally more expensive than planned rehab and CIPP is typically not possible once a collapse does occur, and much more expensive replacement is therefore required, This study is anticipated to help focus the Water Authority's rehab budget on the lines that will be higher cost in the event of a collapse.
4. A purchase order has been issued to replace the camera and tractor equipment on the Water Authority's two CCTV units. The new equipment will be obtained and put into service in FY2016.
5. Purchase orders have been issued for two new Vactors which will be obtained and put into service in FY2016.

FOG Policy Implementation:

FOG Policy is an on-going program. Long-term recommendations were made in the FY2014 CMOM Report. The following are on-going efforts to meet the long-term FY2014 recommendations:

1. Develop a link between the Linko FOG database utilized by NPDES Pretreatment and the Maximo work order system used by the Collection Section.
2. Began creating a FSE flier in Spanish. FOG will continue to develop FSE fliers in languages other than English.
3. Satellite Community agreements require that FSE connections be coordinated with the Water Authority.
4. The Pretreatment Program began issuing NOVs for not complying with the record keeping requirements of the SUO and FOG policy. NOVs were issued to 67 FSEs for missing manifests.
5. The Pretreatment Program began issuing NOVs for not complying with the direct access provisions of the SUO and FOG policy.

Collection System Capital Implementation Program (CIP) Funding

This is an on-going program. The following recommendation is made in the FY2013 CMOM Report: "Based on the need for additional funding, the Water Authority Board approved rate increases for three of the next five fiscal years beginning in FY2014. The rate increases assist the Water Authority in increasing CIP funding for the Collection System."

The Water Authority has approved and implemented 5% revenue rate adjustments in FY2014, FY2015 and FY2016.

This completes this recommendation.

Overflow Emergency Response Plan (OERP)

This is an on-going program to update the OERP as required. In FY2014, the following modifications were made to the OERP:

1. Page 5. Clarification of how private vs. public lines can be resolved using our GIS mapping. Statement to identify private lines in the proper GIS layer, if the private line may be confused with the public system.
2. Page 7. In accordance with EPA directive, deleted requirement to report spills to U.S. Fish & Wildlife Service.
3. Page 11. Corrected telephone number.

The Collection Section is the "owner" of the OERP. The Collection Section creates the components of the OERP, routes for internal review (specifically including the Compliance Division), and the completed portions are approved for posting to Maximo by the Collection Section Manager. Appendix 3 provides the OERP which was in effect at the end of FY2015.

In accordance with the OERP, the Water Authority coordinated with the appropriate MS4 Permittees on two spills. The 1/7/2015 spill impacted the North Pino and the Water Authority coordinated with AMAFCA in the cleanup which included pumping out the sewage at containment structures on the North Pino and treating with HTH. The response to the 5/23/2015 spill was coordinated with both the City of Albuquerque and AMAFCA. Due to the volume spilled and temporarily contained after this spill, a Corrective Action Response was submitted to NMED Ground Water Quality Bureau and approval was received from NMED. Both the Approval and the Corrective Action Response are attached in Appendix 10.

Force Main Inspection Program

This is an on-going program. In FY2015 valves found in field were compared to those in the GIS mapping and this information was stored in Maximo. In addition, the Lift Station 24 force mains were studied and in FY16 critical valves will be located and brought to grade.

Closed Circuit Television (CCTV)

This is an on-going program. The following recommendation is made in the FY2013 CMOM Report: "CCTV inspections of the collection system as follows: 1) Small diameter main lines less than 15": In four of five years, televise approximately 5% per year of the small diameter system. Televise high risk lines based on current Asset Management Plan and subsequent in-house analysis. 2) Large diameter lines 15" and larger: Every fifth year, televise as much as possible acknowledging access limitations of the unlined concrete lines 15" and larger.

Anticipated schedule: 3) FY2014-17: 5% of the small diameter each year. 2) FY18: Large diameter unlined concrete pipe."

The CCTV program will continue. Anticipated schedule:

1. FY16-17: 5% of the small diameter each year.
2. FY18: Large diameter unlined concrete pipe.
3. FY19: 5% of the small diameter each year.
4. FY20: 5% of the small diameter each year.

The FY2015 portion of this recommendation is complete. It is currently estimated that that the system includes 1988 miles of small diameter gravity pipe. In FY2015, approximately 115.8 miles of small diameter line was televised, i.e. 5.8%.

Cleaning Program Goal

This is an on-going program. The following recommendation is made in the FY2013 CMOM Report: "The Water Authority will establish and monitor a goal of cleaning all gravity small diameter lines every ten years. (This will be accomplished through the existing Sub-Basin program.) The Water Authority will continue the program of high-frequency maintenance of known problem locations within the system. (This will be accomplished through the existing Short Interval program.) The frequency of Short Interval cleaning will vary in accordance with system performance and risk factors, maintenance history, and the latest maintenance findings."

The FY2015 portion of this recommendation is complete. In FY2015, the Water Authority cleaned approximately 344.7 miles under the Sub-Basin program. This is equal to approximately 17.3% of the small diameter system which exceeds the 10% pace implicit in cleaning every ten years. Likewise, the Short Interval cleaning program was maintained with approximately an additional 175.3 miles cleaned. The total length of all types of cleaning, including interceptors, was approximately 616.1 miles.

The cleaning program continues with the same goals.

Cleaning Tools

In accordance with the FY2014 CMOM Report, ninety new nozzles and root saw kits were purchased in FY2015. Twelve sets of six nozzles were acquired and issued to each of the eleven Vactors normally utilized for cleaning and one set was retained as a spare. Each set included nozzles to be used in regular cleaning and threaded nozzle holders were mounted to the Vactor. Each nozzle was engraved with an identification number for tracking and responsibility purposes. Nine specialty and three interceptor cleaning nozzles were also obtained.

This completes this recommendation.

Root Foaming

The following recommendation is made in the FY2013 CMOM Report: "Starting in FY15, implement a 3-year pilot program. Root foam selected lines that meet the root infested and / or inaccessibility criteria. Compare effectiveness to mechanical cleaning currently practiced and provide recommendation."

FY2015 is considered the first year of the 3-year pilot program and in FY2015, ~25,400 LF of small diameter lines were contractor (Dukes) root foamed. This consisted of 84 manhole-to-manhole segments and one root impacted manhole. An equal number of control pipe segments were identified for comparison. The treated and control pipes were selected based on prior CCTV inspections that showed root issues. In FY2016, both the foamed and control pipes will be CCTVed again and conditions compared utilizing PACP coding. In FY2016, additional root impacted pipes will be identified for foaming and for control.

FOG Buster

The following recommendation is made in the FY2013 CMOM Report: "Starting in FY15, implement a 3-year pilot program. Equip two units with FOG Buster equipment and utilize to clean lines known to be impacted by FOG. Compare effectiveness to mechanical cleaning currently practiced and provide recommendation."

Per this recommendation, the equipment was purchased and installed. One high FOG segment was selected and cleaned utilizing FOG Buster in the downstream portion while the upstream portion was cleaned using water. In FY2016, this line will be re-CCTVed and a comparison will be made of the portions cleaned with or without FOG Buster. In addition, FOG Buster may be further tested on lines identified with high FOG but typically not roots or other pipe conditions that may exacerbate FOG blockages.

Lift Station Telemetry

The following recommendation was made in the FY2014 CMOM Report: "During FY2015, install radio telemetry at Stations 80, 81, 82, 83, 84, and 85. Alternately, remove a station from service."

Station 80 has been removed from service by extension of a gravity main. Telemetry systems have been installed and are in service at Stations 84 and 85. These three stations are the only stations that have suffered SSOs since being acquired by the Water Authority in 2009 and were prioritized for improvement. Telemetry installations for Stations 81, 82 and 83 are under contract and are anticipated to be operational by November 30, 2015.

This completes this recommendation.

Generator Plan

The following recommendation is made in the FY2014 CMOM Report: "During FY2015, develop an SOP for use of generators. Develop table of loads at AirVac stations and Lift Stations 20 and 24 that can be handled by available generators and make arrangement to procure locally available rental units."

In FY2015, the SOP was developed. It was also determined that the Water Authority contract with Power Generation Service is available for renting portable generators. Because Lift Stations 20 and 24 have permanent stand-by generators on-site, the AirVac stations are at most likely to be impacted by a power outage. Therefore, in FY2016, a test will be run simulating a simultaneous power failure at two vacuum stations.

Shunt Trip Testing

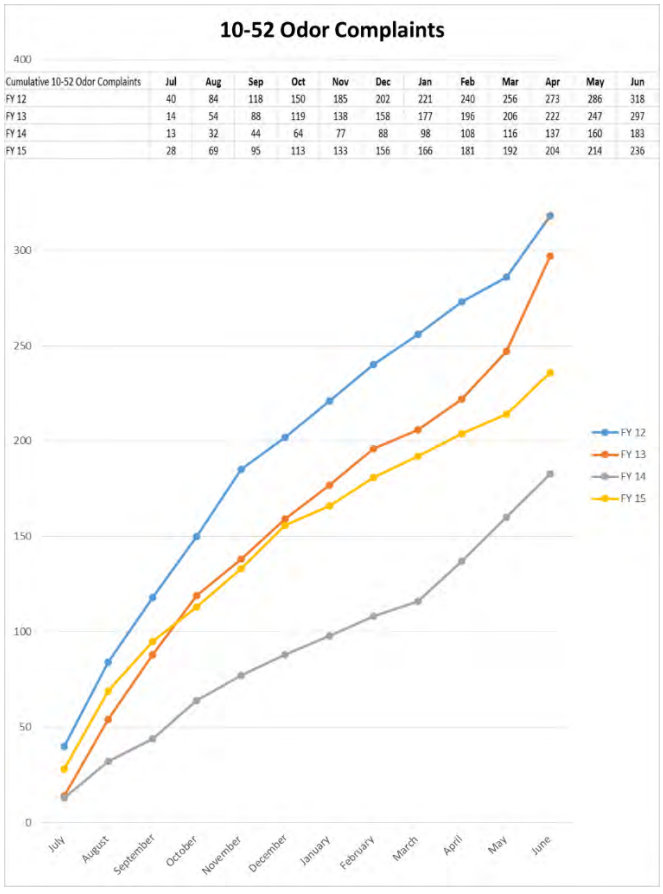
The following recommendation is made in the FY2014 CMOM Report: "During FY2015, design shunt trips, or equivalent, for Lift Stations 20 and 24."

The design is complete and construction is under contract. In FY2016, Lift Stations 20 and 24 will be tested utilizing the shunt trips, simulating a power failure.

Odor Complaints

The Water Authority has committed to tabulate odor complaints by month. The EPA considers odor and corrosion control an issue in collection system O&M, as indicated by the Hydrogen Sulfide Monitoring and Control (HSMC) section in the CMOM Program Self-Assessment standard template from the EPA website.

Odor control is a major issue in warm-weather systems such as Albuquerque's. A high correlation has been demonstrated between odor complaints and the sewage temperature (analysis of FY11 & FY12 temperature vs. odor complaint data, $r = 0.89$, $p < 0.02$). Odor complaints are also known as a 10-52. The following graphic shows the odor complaints received by the Water Authority in FY2012 through FY2015. All odor complaints received are included in this graphic; however, study has indicated that approximately ¾ of the complaints received originate in the private and not the public system.



Cumulative 10-52 Odor Complaints	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
FY 12	40	84	118	150	185	202	221	240	256	273	286	318
FY 13	14	54	88	119	138	158	177	196	206	222	247	297
FY 14	13	32	44	64	77	88	98	108	116	137	160	183
FY 15	28	69	95	113	133	156	166	181	192	204	214	236

Figure 3 Odor Complaints

The following flow chart describes the process followed by the Water Authority in response to an odor complaint. This specific process in the immediate response and the follow-up to odor complaints is due to the importance placed on customer service. Also, the Water Authority has found that some odor complaints are due to a blockage prior to an overflow; therefore, a quick response can prevent an SSO.

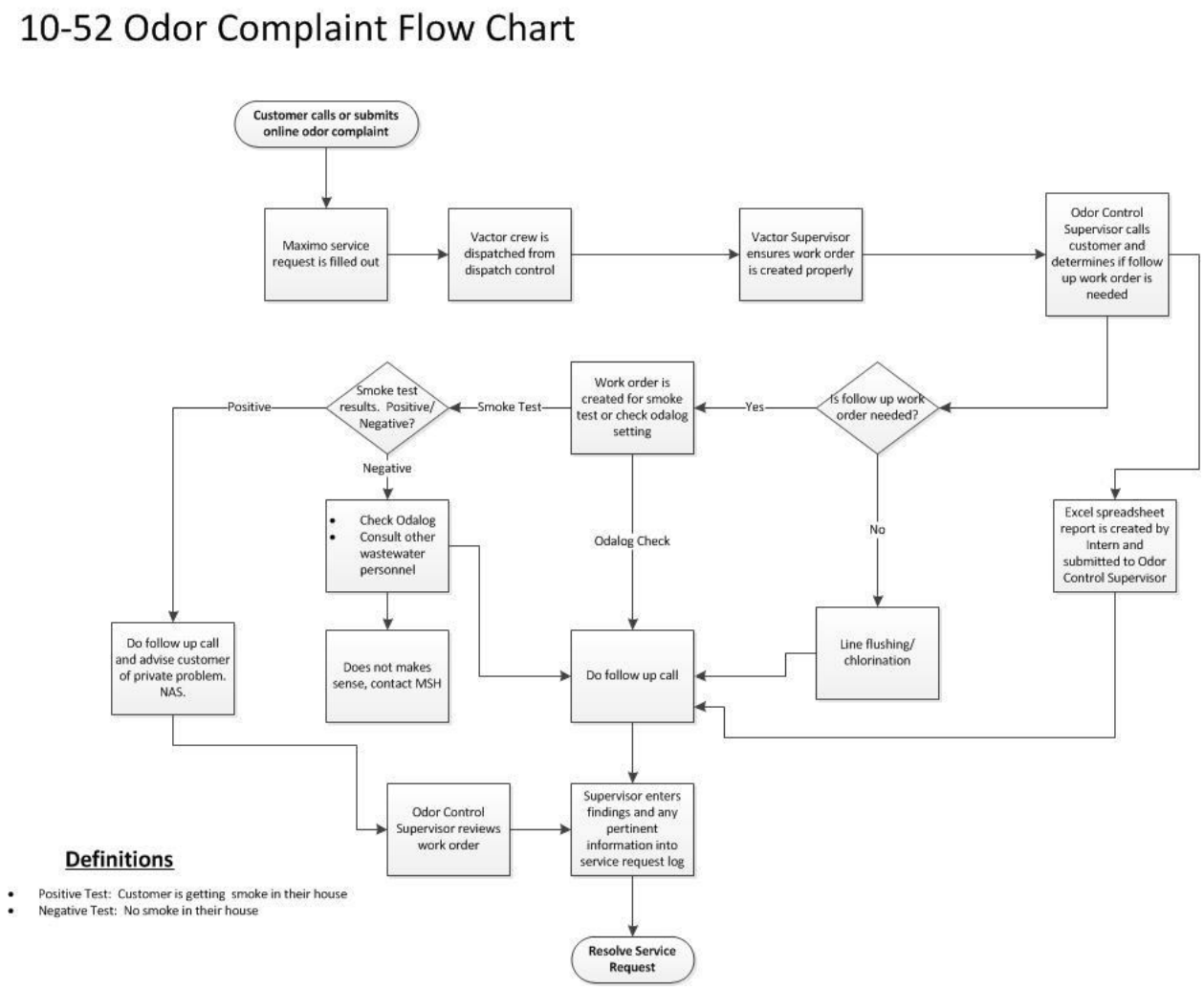


Figure 4 Odor Complaint Flow Chart

Identified Gaps in the Water Authority Processes with Recommendation to Close

In the process of continuous improvement, the Water Authority is committed to identifying and closing gaps. Gaps were identified in the FY2014 CMOM Report with recommendations to close. As discussed above, many of these recommendations are now considered On-Going programs. The following are the current gaps with recommendations to close.

Prohibited Discharges, i.e., SSOs

The Water Authority acknowledges that prohibited discharges have occurred and that all discharges from the sanitary sewer system are prohibited.

Recommendation: The Water Authority will annually examine sewer system performance, set specific steps for decreasing SSOs and mitigating their impacts, and has a program of continuous improvement.

Manhole Base Sketches & Follow-Up

The Water Authority has found poor manhole hydraulics may contribute to SSOs. Since 2012 some manhole bases, identified during SSO investigation as described above, have been channelized by Water Authority crews and, in this limited sample size, SSOs have not recurred. It is desired to identify poor hydraulic conditions before an SSO occurs and to increase the pace of manhole channelizing where required.

Recommendation: In FY2016, require manhole base sketches from cleaning and CCTV crews to identify need for channelizing. Follow-up with construction as appropriate.

Written SOPs

The EPA Inspection Report (Appendix 6) identified a need for written SOPs. Area of Concern (AOC) 4 on pg. 14 of the Audit identified the need for a written SOPs for: 1) the procedure of stopping an SSO emergency response on the procedure for stopping an SSO; 2) consistent completion of overflow response reports.

Recommendation: In FY2016, develop and implement SOPs for routine cleaning, for responding to sewer blockages, and for completion of overflow response forms. This is in addition to the "Use of Portable Generators at Sanitary Lift Stations and Vacuum Stations" and the SOP for Shunt Trip Testing, both of which are discussed above.

Appendices

Appendix 1 Sanitary Sewer Overflow Analysis Table

FY2015 Overflow Analysis Table

Type			DMR															SSO Team Study		Enforcement		
10-42	10-48	10-42 &10-48	Maximo WO #	Diameter	Maximo Reported Date	Repeat	Repeat within 1 year	Date of SSO	Time of SSO	Duration (HH:MM)	Location	Estimated Volume (gallons)	Reported Cause of Overflow	Observed Environmental Impacts	Action Taken	Ultimate Discharge Location	Volume Recovered (gallons)	Cause	Mitigation	Pretreatment Follow Up Requested	FSEs Visited	Notice of Violation
X			11679134	10	7/8/2014	N	N	7/8/2014	10:00 AM	1:00	4200 LUECKING PARK AVE NE	1,200	RG	NEAH	CC/WD/RS/HTH	PST	800	CU	NF			
X			11679587	8	7/9/2014	Y	Y	7/8/2014	9:10 AM	:55	1135 CORRALES RD NW	1,500	EQ	NEAH	CWW/WD/HTH	AC	300	EQ	RH			
X			11681728	8	7/11/2014	N	N	7/11/2014	9:35 AM	1:40	Carlisle & Indian School Blvd. NE	700	LF	NEAH	CC/RS/HTH	SD	100	LF	RH			
X			11682717	8	7/14/2014	Y	Y	7/11/2014	7:15 AM	3:20	9601 Lyon Rd NW	12,473	EQ	NEAH	CWW/WD/RP	O	5,500	EQ	RH			
X			11687128	8	7/21/2014	Y	Y	7/20/2014	3:15 PM	3:30	BLUEFEATHER & LYONS BLVD NW	10,846	EQ	NEAH	CWW/WD/RP/HTH	O	4,800	EQ	RH			
X			11691986	8	7/30/2014	N	N	7/30/2014	9:56 AM	:24	11409 APPIAN WY NE	52	GR/RG	NEAH	CC/WD/RS/HTH	PST	40	RT	SP			
X			11695139	8	8/2/2014	N	N	8/2/2014	9:15 AM	1:45	San Francisco & Louisiana NE	2,625	DB/GR	NEAH	CC/RS/WD/HTH	PST	450	SC	SP			
X			11696051		8/4/2014	Y	Y	8/2/2014	11:45 AM	1:45	LIFT STATION 385 - Corrales Lift Station - 10800 Corrales Rd NW	5,250	EQ	NEAH	HTH	AC	-	EQ	RH			
	X		11696901	8	8/6/2014	N	N	8/5/2014	2:05 PM	:55	701 CENTRAL AVE NE	-	LF	NEAH	CC	PP	-	LF	RH			
	X		11705869	8	8/21/2014	N	N	8/19/2014	7:20 PM	:20	515 VASSAR DR SE	-	RT	NEAH	CC	PP	-	RT	SP			
	X		11721355	8	9/2/2014	N	N	8/28/2014	12:33 PM	1:27	9950 CENTRAL AVE SE	-	BP/DB/GR	NEAH	CC	PP	-	BP	SP			
X			11723318	8	9/5/2014	N	N	9/4/2014	8:45 PM	:40	TRACY & EL SOLINDO NE	4,000	RGR	NEAH	CC/CWW/RP/RS/WD/HTH	SD	500	RT	SP			
	X		11726500	8	9/11/2014	Y	Y	9/10/2014	3:10 PM	2:10	114 GIRARD BLVD SE	-	GR	NEAH	CC	PP	-	GR	PT/SI	Y	1	
	X		11725156	8	9/5/2014	N	N	9/5/2014	9:00 AM	:45	801 YALE BLVD NE	-	GR	NEAH	CC	PP	-	CU	NF			
X			11727324	8	9/13/2014	N	N	9/13/2014	11:25 AM	3:00	5980 ALAMEDA RD NE	200	GR	NEAH	WD/HTH/CWW	SD	40	DB/RK	PT	Y	3	1
X			11728725	8	9/16/2014	N	N	9/16/2014	9:28 PM	1:53	5995 ALAMEDA BLVD NE	40	GR/DB/RK	NEAH	CC/WD/HTH	PL/PST	-	DB/RK	PT			
X			11734441	8	9/28/2014	N	N	9/28/2014	1:00 PM	2:30	10412 PROSPECT AVE NE	50	DB/RK	NEAH	CC/WD/HTH	PST	50	CO	RH			
X			11741780	8	10/13/2014	Y	N	10/13/2014	4:00 PM	:55	CONCHAS & COCHITI SE	10	GR/RG	NEAH	CC/WD/HTH	PST	10	LF	RH/PT	Y	1	1
	X		11747879	8	10/22/2014	N	N	10/20/2014	8:20 PM	:10	5115 GLENDALE RD NW	-	BP/EQ	NEAH	CC	PP	-	BP	NF			
X			11752829	8	10/27/2014	N	N	10/27/2014	9:15 AM	:30	12312 PROSPECT AVE NE	60	RGR	NEAH	CC/WD/HTH	PST	-	RT	SP			
X			11754727	8	10/30/2014	Y	N	10/30/2014	10:30 AM	:20	2800 LA VETA DR NE	100	GR	NEAH	CC/CW/HTH	PST	80	GR	PT/SP	Y	4	
X			11759835	8	11/12/2014	Y	N	11/7/2014	2:30 PM	:55	4700 DANUBE DR NE	275	RT	NEAH	CC/CWW/WD//HTH	SD	100	RT	SI			
	X		11759149	8	11/10/2014	N	N	11/7/2014	8:20 PM	:50	11504 NASSAU DR NE	-	CU	NEAH	CC	PP	-	RT	SI			
X			11759453	8	11/11/2014	N	N	11/11/2014	8:45 PM	3:45	612 BETHEL AVE SE	25	GR/RGS	NEAH	CC/CWW/WD/RP	PST	25	GR	SP/PT	Y	3	
	X		11767842	8	11/26/2014	Y	N	11/26/2014	7:00 PM	NA	315 SAN LORENZO AVE NW	-	BP/EQ	NEAH	CC	PP	-	BP	SP			
X			11775821	8	12/20/2014	N	N	12/20/2014	8:45 AM	2:15	HENDRIX AVE. & WOODFORD DR. NE	725	GR/SGG	NEAH	CC/WD/RS/HTH	PST	300	RT/SC	SP/RF			
X			11776539	8	12/22/2014	N	N	12/22/2014	11:30 AM	:40	14400 SOULA DR NE	80	GR/RT	NEAH	CWW/WD/HTH	PST	30	RT	SP			
	X		11778731	8	12/29/2014	N	N	12/28/2014	2:15 PM	NA	2038 WISCONSIN ST NE	-	GR	NEAH	CC	PP	-	GR	PT/SP	Y	4	1
X			11780583	8	1/1/2015	Y	N	1/1/2015	6:40 PM	2:21	Juan Tabo Blvd. & Southern Ave. SE	7,050	RGS	NEAH	CC/WD/RS/HTH	SD	-	CU	NF			
	X		11782356	8	1/6/2015	Y	N	1/6/2015	12:30 AM	NA	187 MONTE LARGO DR NE	-	RGR	NEAH	CC	PP	-	RT	SP/SI			
X			11783536	8	1/8/2015	N	N	1/7/2015	6:00 AM	3:33	7550 Pan American Freeway NE	26,954	GR	NEAH	CC/CWW/RS/WD/HTH	AC	28,000	DB	SC			
X			11785770	8	1/12/2015	Y	N	1/12/2015	3:25 PM	:50	3904 68TH ST NW	40	GR	NEAH	CC/WD/RP	PST	40	RT	SP/SI			

FY2015 Overflow Analysis Table

Type			DMR															SSO Team Study		Enforcement		
10-42	10-48	10-42 &10-48	Maximo WO #	Diameter	Maximo Reported Date	Repeat	Repeat within 1 year	Date of SSO	Time of SSO	Duration (HH:MM)	Location	Estimated Volume (gallons)	Reported Cause of Overflow	Observed Environmental Impacts	Action Taken	Ultimate Discharge Location	Volume Recovered (gallons)	Cause	Mitigation	Pretreatment Follow Up Requested	FSEs Visited	Notice of Violation
X			11787912	8	1/16/2015	N	N	1/16/2015	10:10 AM	1:15	5100 INDIAN SCHOOL RD NE	40	GR/RGS	NEAH	CC/WD/HTH	SD	-	GR	SP			
X			11788931	8	1/20/2015	N	N	1/17/2015	2:05 PM	1:50	10410 SANTA SUSANA RD NE	25	RT	NEAH	CC/WD/RP/HTH	PST	20	RT	SP			
X			11795464	8	1/27/2015	N	N	1/27/2015	9:26 AM	1:49	1115 Central Ave. NE	80	DB	NEAH	CC/WD/HTH	SD	-	OJ	RH/PT	Y	4	1
X			11795461	8	1/28/2015	N	N	1/27/2015	1:30 PM	1:25	2350 Alamo Ave SE	125	RT	NEAH	CC/WD/HTH	SD	-	RT	SP			
X			11796154	8	1/29/2015	Y	Y	1/28/2015	7:50 AM	:52	Blue Feather & Lyons Blvd NW	6,462	EQ	NEAH	CW/WD/RS/HTH	O	5,000	EQ	NF			
X			11798188	8	1/31/2015	N	N	1/31/2015	11:50 AM	2:00	11801 TIVOLI AVE NE	100	RT	NEAH	CC/WD/RP/HTH	PST	80	RT	SP			
X			11800422	8	2/7/2015	N	N	2/7/2015	10:50 AM	1:25	4411 CANYON CT NE	50	RT	NEAH	BR/CC/RP/HTH	PST	30	RT	SP			
X			11803003	8	2/12/2015	N	N	2/12/2015	7:30 AM	1:10	14217 TURNER CT NE	210	RG/RT	NEAH	CC/RP/HTH	PST	100	RT	SP/SI			
	X		11805472	8	2/18/2015	N	N	2/13/2015	12:05 PM	NA	3037 YUMA RD SW	-	BP	NEAH	ENC	PP	-	BP	SP			
X			11803775	8	2/15/2015	Y	N	2/15/2015	3:00 PM	2:40	517 DOLORES DR SW	50	GR	NEAH	CW/WD/RP/CC	PST	50	OJ	RH			
	X		11806576	8	2/20/2015	N	N	2/20/2015	1:10 AM	NA	11600 FREEWAY PL NE	-	GR	NA	CC	PP	-	OJ	RH			
X			11806883	8	2/21/2015	N	N	2/21/2015	10:00 AM	2:45	1931 LA VETA DR NE	615	RGR	NEAH	CC/RP/HTH	PST	100	DB	SP			
X			11806887	8	2/21/2015	N	N	2/21/2015	10:45 AM	2:35	11011 BALDWIN AV NE	810	RGS	NEAH	CC/CW/RP/HTH	PST	60	DB	SP			
X			11807004	8	2/22/2015	N	N	2/22/2015	4:00 PM	1:35	6400 MOSSMAN PL NE	10	GR/RGS	NEAH	CC/WD/HTH	PST	10	GR	SP			
X			11808113	8	2/24/2015	N	N	2/24/2015	7:23 AM	:33	733 OMAHA ST NE	100	GR	NEAH	CC/WD/RS/HTH	PST	10	RT	SP			
X			11808171	8	2/24/2015	N	N	2/24/2015	11:40 AM	:25	MORRIS & CHICO NE	10	GR	NEAH	CC/CW/WD/HTH	PST	10	LF	RH			
X			11810772	8	3/1/2015	Y	N	3/1/2015	11:50 AM	1:35	3911 VERANDA RD NE	285	GR	NEAH	CC/RP/HTH	PST	30	GR	RH			
X			11812661	8	3/4/2015	N	N	3/4/2015	2:44 PM	1:14	1700 Lomas Blvd NE	3,700	RGS	NEAH	CC/WD/HTH	SD	-	DB	SP			
X			11813760	8	3/6/2015	N	N	3/6/2015	8:51 AM	2:54	13305 WILDERNESS PL NE	4,350	RGR	NEAH	CC/WD/HTH	O	-	RT	SP/RF			
X			11820475	8	3/17/2015	N	N	3/17/2015	1:00 PM	:15	3707 12TH ST NW	30	GR	NEAH	CC/RP/WD/HTH	PL	30	GR	SP			
X			11821154	8	3/18/2015	Y	Y	3/18/2015	6:37 PM	:53	5601 COLD CREEK AVE NW	795	EQ	NEAH	CW/WD/RP/HTH	O	700	EQ	NF			
X			11822404	8	3/21/2015	N	N	3/21/2015	8:50 AM	2:40	11512 HUGHES AVE NE	2,000	RGS	NEAH	CC/WD/RP/CWW	SD	2,000	RT	SP			
X			11831011	8	4/6/2015	N	N	4/6/2015	4:35 PM	:52	1800 ASH ST SE	520	GR	NEAH	CWW/CC/HTH	SD	200	GR	SP			
X			11831199	8	4/7/2015	Y	Y	4/6/2015	9:50 PM	1:01	BLUE FEATHER & LYONS NW	2,440	EQ	NEAH	WD/RP/HTH	O	2,000	EQ	NF			
X			11832814	8	4/8/2015	N	N	4/8/2015	8:00 PM	:20	5036 ARROYO CHAMISA RD NE	50	GR	NEAH	CC/WD/HTH	PST	25	RT	SP			
	X		11843447	8	4/27/2015	N	N	4/28/2015	9:20 PM	NA	5018 3RD ST SW	-	BP	NEAH	ENC	PP	-	BP	SP			
X			11846414	8	5/4/2015	Y	N	5/4/2015	6:32 PM	:23	3310 INDIAN SCHOOL RD NE	345	GR	NEAH	CWW/WD/RS/CC/HTH	SD	100	GR	SP/SI/PT/RH	Y	1	
		X	11849744	8	5/9/2015	Y	N	5/9/2015	1:40 PM	2:40	10323 CHANDLER DR NW	480	GR	NEAH	CWW/CC/RP/HTH	PST	80	GR	SP			
	X		11849746	8	5/9/2015	N	N	5/9/2015	2:20 PM	NA	3045 TOREADOR CT NE	-	GR/RGS	NA	CC	PP	-	RT	SP			
X			11852299	8	5/14/2015	N	N	5/13/2015	10:40 PM	2:20	7852 RIDGEVIEW DR NW	280	GR/RGS	NEAH	CC/WD/HTH	PST	20	RT	RF			
X			11857877	8	5/22/2015	N	N	5/22/2015	8:05 AM	:40	3307 BAHAMA ST NE	50	RT	NEAH	CC/WD/HTH	SD	-	RT	SP			
X			11859647	30	5/26/2015	N	N	5/23/2015	3:00 PM	24:20	3100 MENAUL BLVD NE	2,000,000	LF	NEAH	CWW/RP/HTH	O	2,000,000	LF	NF			
X			11864672	8	6/2/2015	N	N	6/2/2015	12:12 PM	:23	4423 SHERRE DR NE	46	RGS	NEAH	CWW/CC/WD/HTH	PST	40	RT	SP			
	X		11867804	8	6/8/2015	N	N	6/7/2015	NA	NA	1330 LOUISIANA BLVD NE	-	GR	NEAH	CC	PP	-	GR	PT/SI	Y	2	1
X			11872692	8	6/11/2015	Y	N	6/11/2015	10:00 AM	1:15	9180 COORS BLVD NW	40	GR	NEAH	CC/WD/RP/HTH	PL	30	GR	SP/SI/PT			
X			11874032		6/15/2015	N	N	6/12/2015	10:40 AM	:30	LIFT STATION 380 - The Trails Lift Station - 8701 Universe Blvd NW	30,967	EQ	NEAH	CWW/HTH	YD	29,418	EQ	NF			

Appendix 2 Sanitary Sewer Overflow Volume Captured Analysis Table

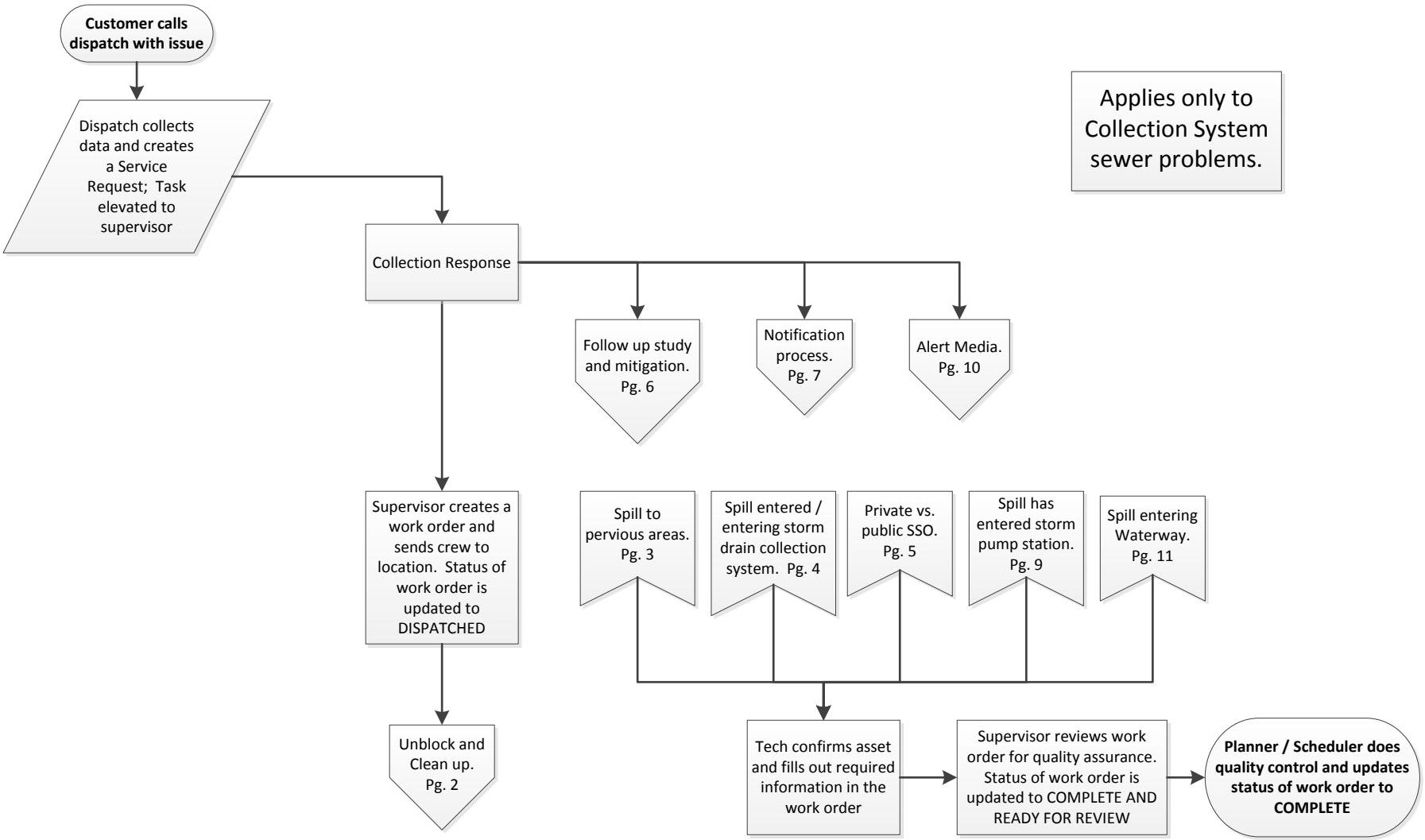
FY2015 10-42 SPILL VOLUME AND VOLUME RECOVERED							
			Estimated				
Maximo WO #	Date of SSO	Location	Volume (gallons)	Volume Recovered (gallons)	Volume Not Recovered	% Recovered	Ultimate Discharge Location
11679134	7/8/2014	4200 LUECKING PARK AVE NE	1,200	800	400	67%	PST
11679587	7/8/2014	1135 CORRALES RD NW	1,500	300	1,200	20%	AC
11681728	7/11/2014	Carlisle & Indian School Blvd. NE	700	100	600	14%	SD
11682717	7/11/2014	9601 Lyon Rd NW	12,473	5,500	6,973	44%	Dirt Retention Pond
11687128	7/20/2014	BLUEFEATHER & LYONS BLVD NW	10,846	4,800	6,046	44%	Dirt Retention Pond
11691986	7/30/2014	11409 APPIAN WY NE	52	40	12	77%	PST
11695139	8/2/2014	San Francisco & Louisiana NE	2,625	450	2,175	17%	PST
11696051	8/2/2014	LIFT STATION 385 - Corrales Lift Station	5,250	0	5,250	0%	AC
11723318	9/4/2014	TRACY & EL SOLINDO NE	4,000	500	3,500	13%	SD
11727324	9/13/2014	5980 ALAMEDA RD NE	200	40	160	20%	SD
11728725	9/16/2014	5995 ALAMEDA BLVD NE	40	0	40	0%	PST/PL
11734441	9/28/2014	10412 PROSPECT AVE NE	50	50	0	100%	PST
11741780	10/13/2014	CONCHAS & COCHITI SE	10	10	0	100%	PST
11752829	10/27/2014	12312 PROSPECT AVE NE	60	0	60	0%	PST
11754727	10/30/2014	2800 LA VETA DR NE	100	80	20	80%	PST
11759835	11/7/2014	4700 DANUBE DR NE	275	100	175	36%	SD
11759453	11/11/2014	612 BETHEL AVE SE	25	25	0	100%	PST
11775821	12/20/2014	HENDRIX AVE. & WOODFORD DR. NE	725	300	425	41%	PST
11776539	12/22/2014	14400 SOULA DR NE	80	30	50	38%	PST
11780583	1/1/2015	Juan Tabo Blvd. & Southern Ave. SE	7,050	0	7,050	0%	SD
11783536	1/7/2015	7550 Pan American Freeway NE	26,954	28,000	-1,046	104%	AC
11785770	1/12/2015	3904 68TH ST NW	40	40	0	100%	PST
11787912	1/16/2015	5100 INDIAN SCHOOL RD NE	40	0	40	0%	SD
11788931	1/17/2015	10410 SANTA SUSANA RD NE	25	20	5	80%	PST
11795461	1/27/2015	2350 Alamo Ave SE	125	0	125	0%	SD
11795464	1/27/2015	1115 Central Ave. NE	80	0	80	0%	SD
11796154	1/28/2015	Blue Feather & Lyons Blvd NW	6,462	5,000	1,462	77%	Dirt Retention Pond
11798188	1/31/2015	11801 TIVOLI AVE NE	100	80	20	80%	PST
11800422	2/7/2015	4411 CANYON CT NE	50	30	20	60%	PST
11803003	2/12/2015	14217 TURNER CT NE	210	100	110	48%	PST
11803775	2/15/2015	517 DOLORES DR SW	50	50	0	100%	PST
11806883	2/21/2015	1931 LA VETA DR NE	615	100	515	16%	PST
11806887	2/21/2015	11011 BALDWIN AV NE	810	60	750	7%	PST
11807004	2/22/2015	6400 MOSSMAN PL NE	10	10	0	100%	PST
11808113	2/24/2015	733 OMAHA ST NE	100	10	90	10%	PST
11808171	2/24/2015	MORRIS & CHICO NE	10	10	0	100%	PST
11810772	3/1/2015	3911 VERANDA RD NE	285	30	255	11%	PST
11812661	3/4/2015	1700 Lomas Blvd NE	3,700	0	3,700	0%	SD
11813760	3/6/2015	13305 WILDERNESS PL NE	4,350	0	4,350	0%	Dirt Arroyo Holding Pond
11820475	3/17/2015	3707 12TH ST NW	30	30	0	100%	PL
11821154	3/18/2015	5601 COLD CREEK AVE NW	795	700	95	88%	Detention Pond
11822404	3/21/2015	11512 HUGHES AVE NE	2,000	2,000	0	100%	SD
11831011	4/6/2015	1800 ASH ST SE	520	200	320	38%	SD
11831199	4/6/2015	BLUE FEATHER & LYONS NW	2,440	2,000	440	82%	Detention Pond
11832814	4/8/2015	5036 ARROYO CHAMISA RD NE	50	25	25	50%	PST
11846414	5/4/2015	3310 INDIAN SCHOOL RD NE	345	100	245	29%	SD
11849744	5/9/2015	10323 CHANDLER DR NW	480	80	400	17%	PST
11852299	5/13/2015	7852 RIDGEVIEW DR NW	280	20	260	7%	PST
11857877	5/22/2015	3307 BAHAMA ST NE	50	0	50	0%	SD
11859647	5/23/2015	3100 MENAUL BLVD NE	2,000,000	2,000,000	0	100%	Retention Pond
11864672	6/2/2015	4423 SHERRE DR NE	46	40	6	87%	PST
11872692	6/11/2015	9180 COORS BLVD NW	40	30	10	75%	PL
11874032	6/12/2015	LIFT STATION 380 - The Trails Lift Station	30,967	29,418	1,549	95%	YD
Grand Total			**2,129,320**	**2,081,308**	**48,012**	**98%**	

Appendix 3 Overflow Emergency Response Plan (OERP)

Overflow Emergency Response Plan

01-26-2015

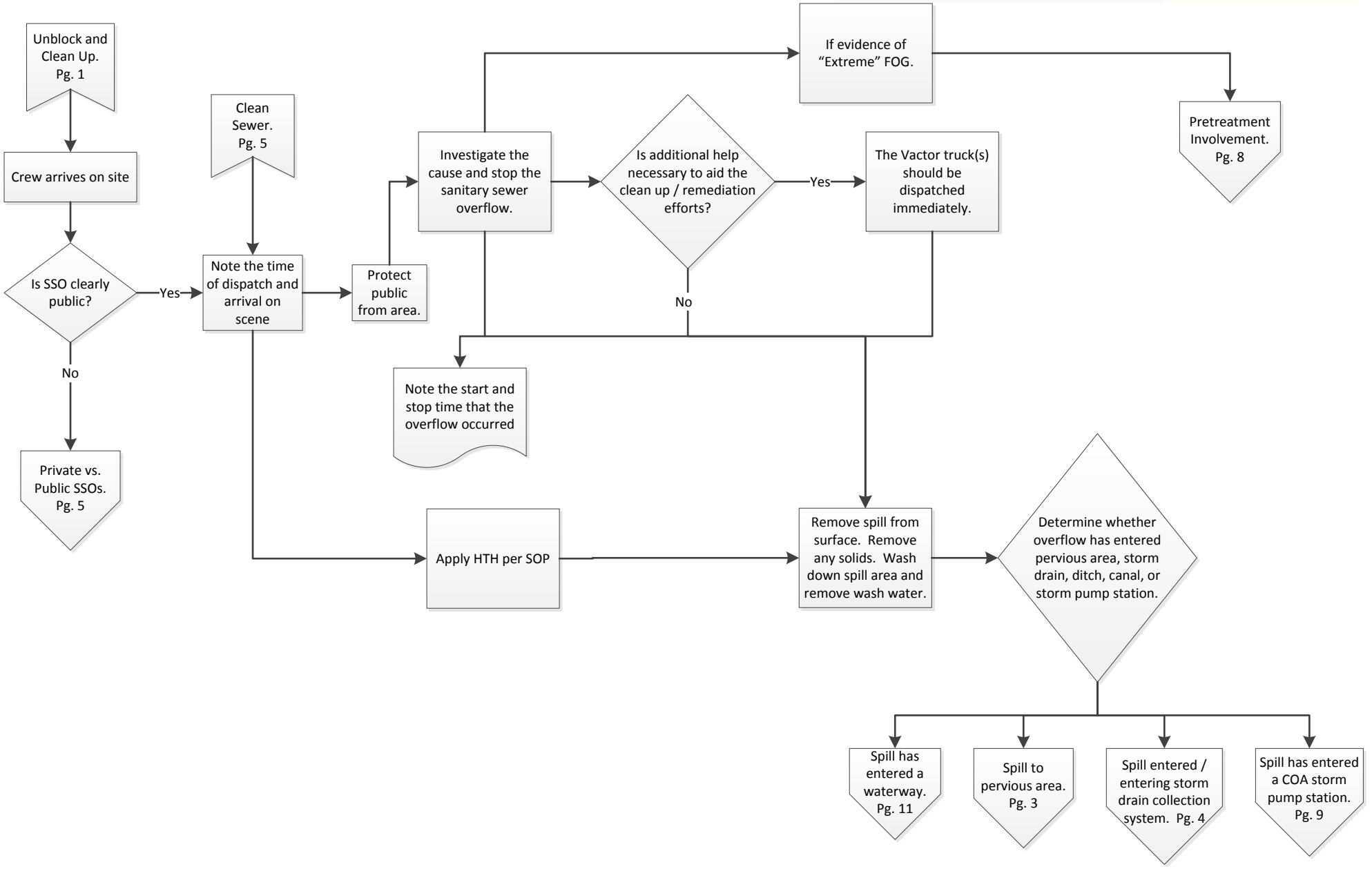
Albuquerque Bernalillo County Water Utility

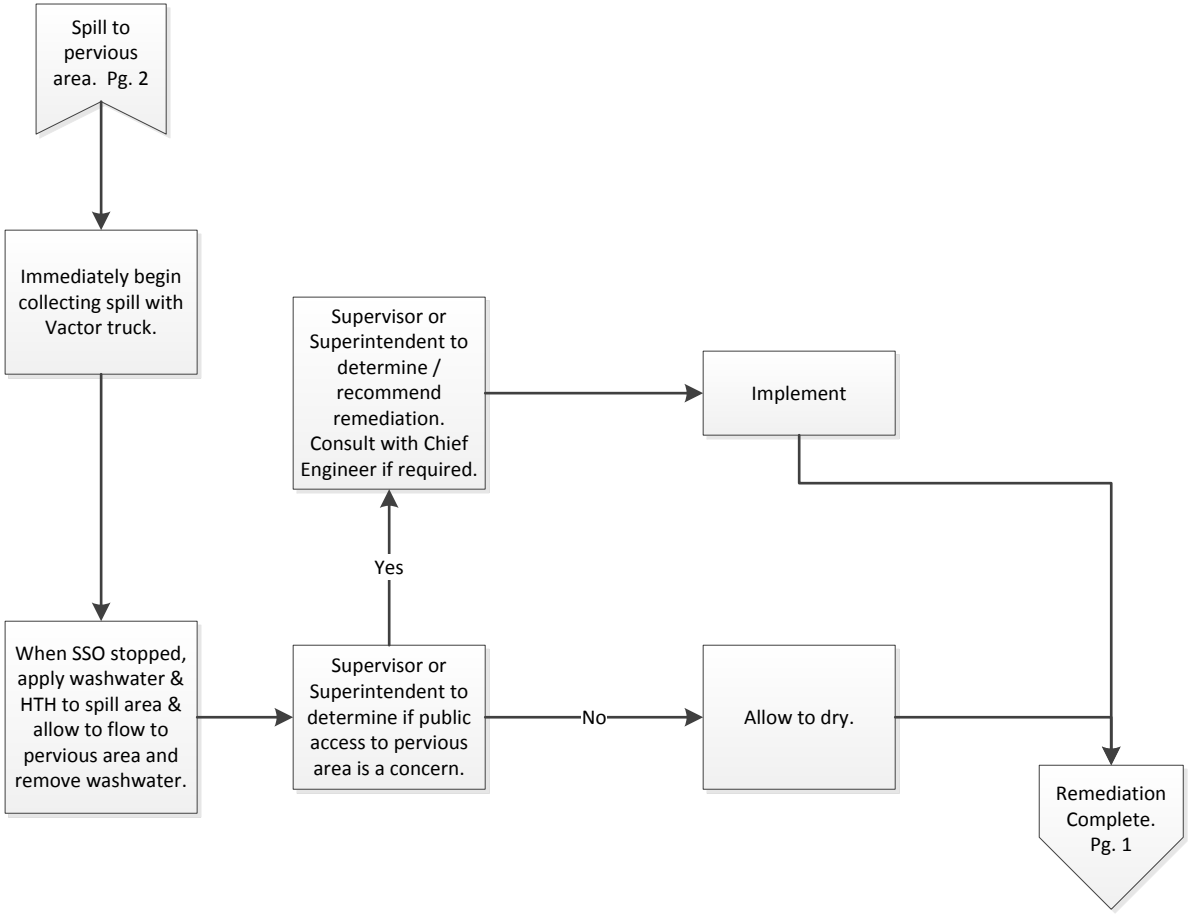


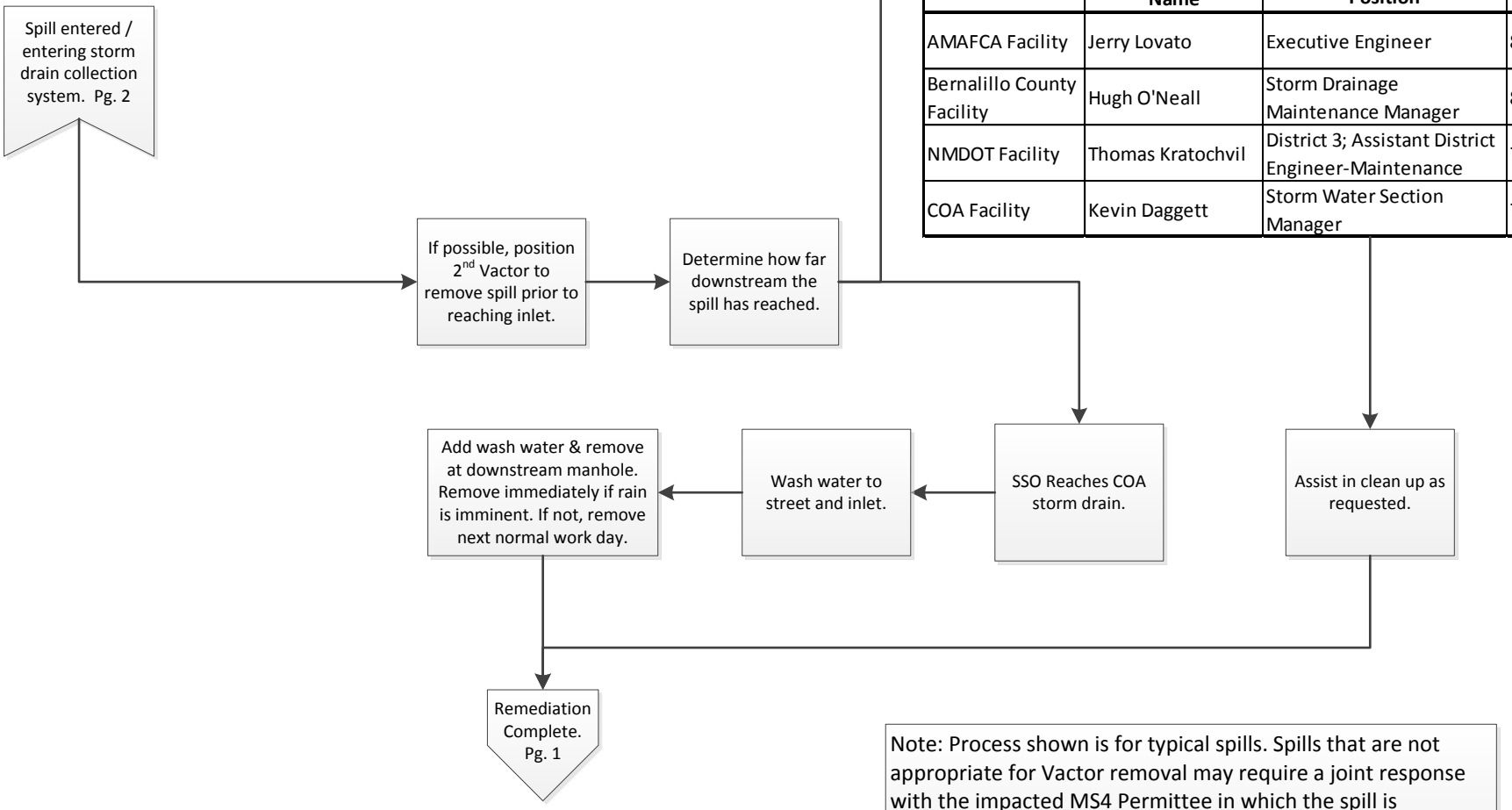
Overflow Emergency Response Plan

01-26-2015

Albuquerque Bernalillo County Water Utility

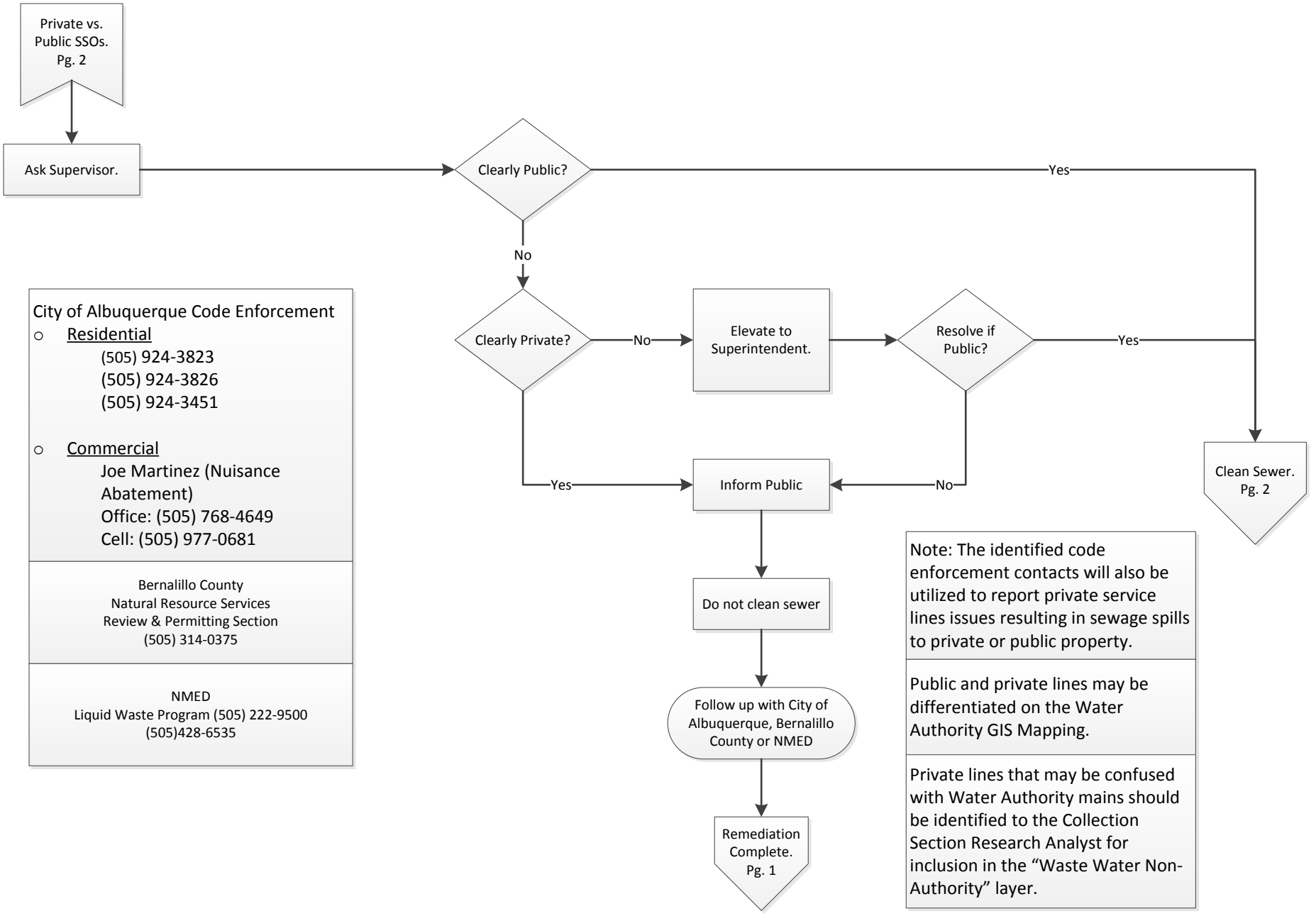


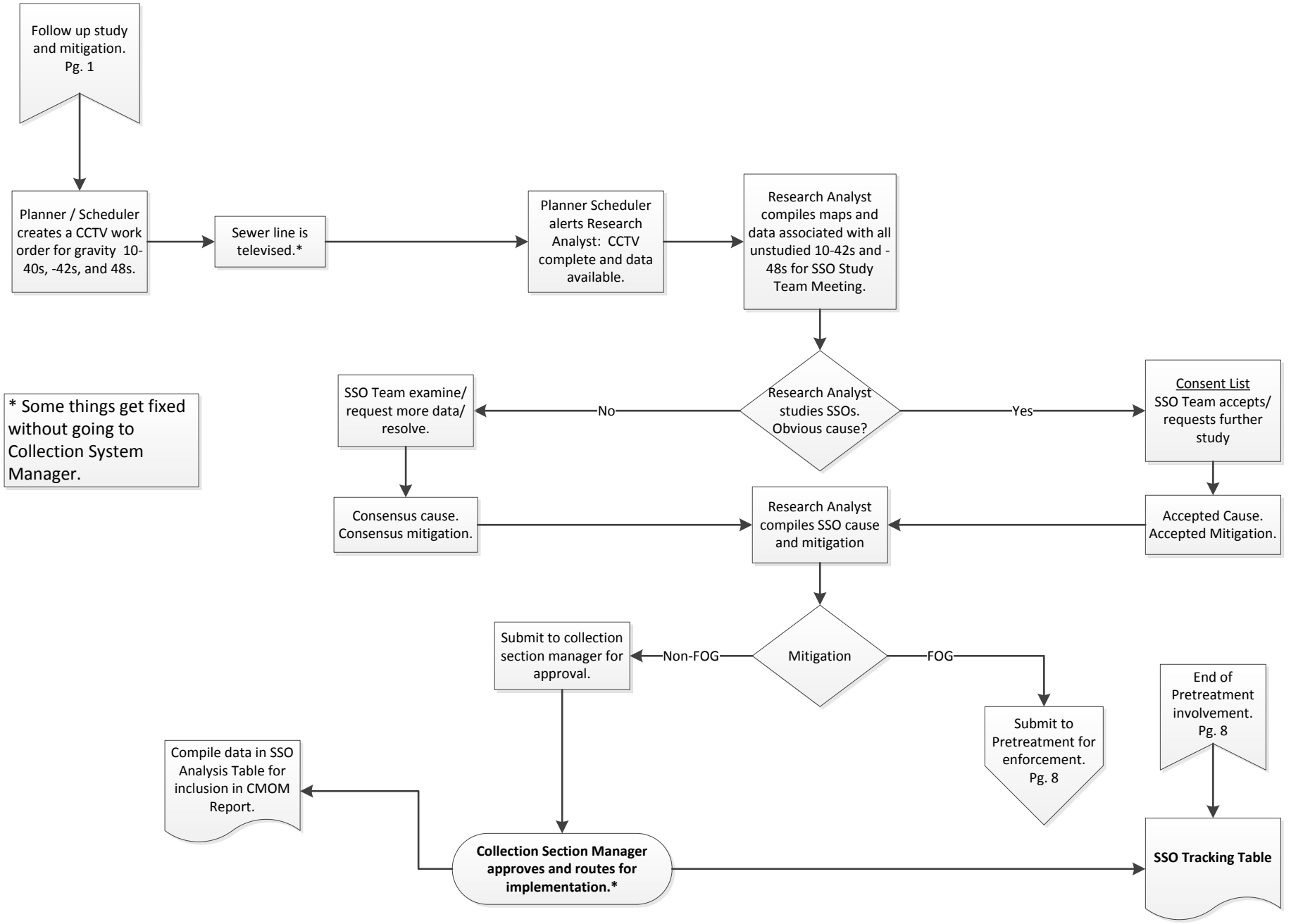

Spill to pervious area. Pg. 2
Immediately begin collecting spill with Vactor truck.
When SSO stopped, apply washwater & HTH to spill area & allow to flow to pervious area and remove washwater.
Supervisor or Superintendent to determine if public access to pervious area is a concern.
Yes
Supervisor or Superintendent to determine / recommend remediation. Consult with Chief Engineer if required.
No
Implement
Allow to dry.
Remediation Complete. Pg. 1

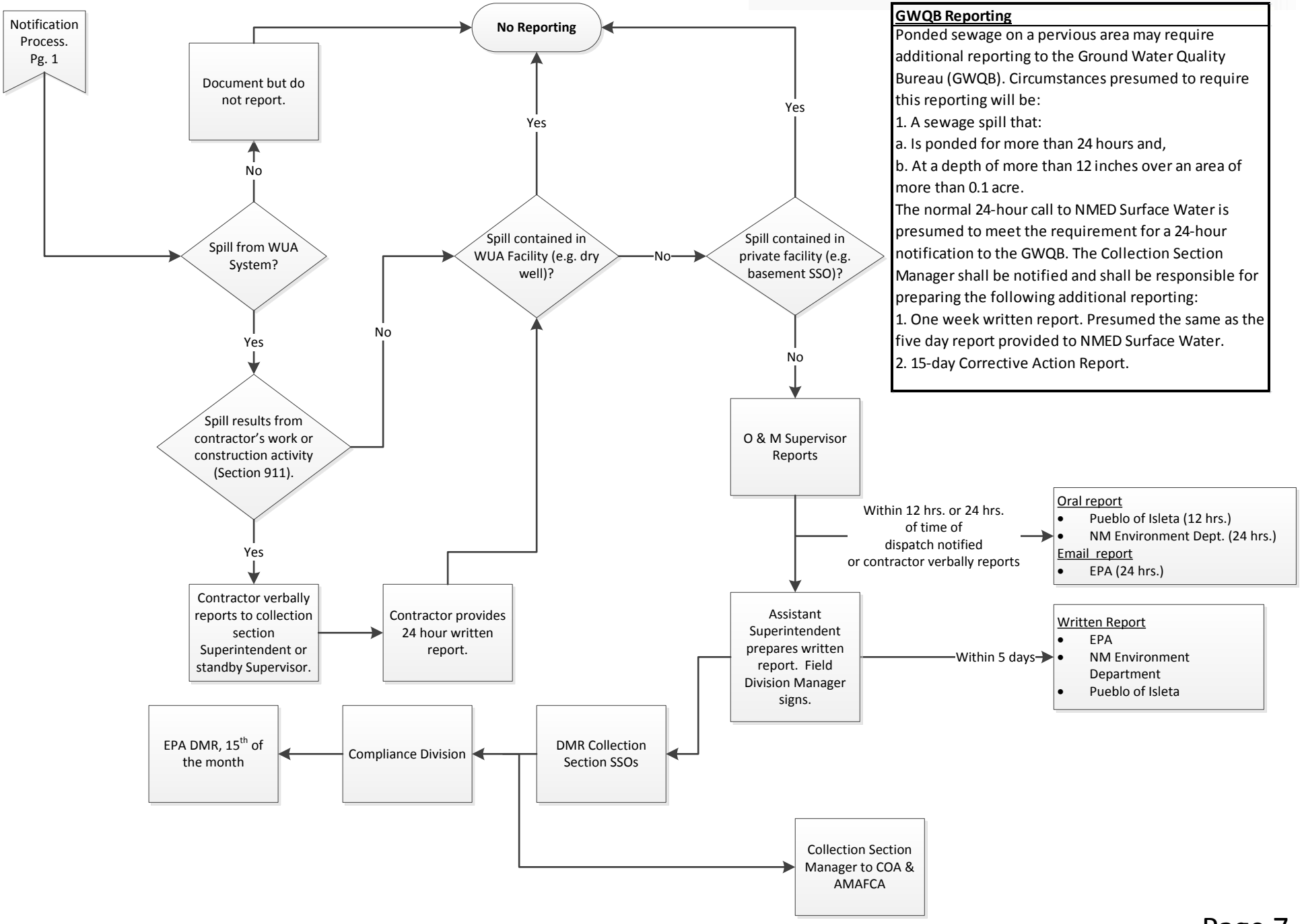


SSO Reaches	Contact			
	Name	Position	Office	Cell
AMAFCA Facility	Jerry Lovato	Executive Engineer	884-2215	362-0020
Bernalillo County Facility	Hugh O'Neall	Storm Drainage Maintenance Manager	848-1505	934-2704
NMDOT Facility	Thomas Kratochvil	District 3; Assistant District Engineer-Maintenance	798-6637	228-8169
COA Facility	Kevin Daggett	Storm Water Section Manager	768-2778	803-8058

Note: Process shown is for typical spills. Spills that are not appropriate for Vactor removal may require a joint response with the impacted MS4 Permittee in which the spill is captured, treated, and determined appropriate for release.


Private vs. Public SSOs. Pg. 2
Ask Supervisor.
Clearly Public?
Yes
No
Clearly Private?
No
Elevate to Superintendent.
Resolve if Public?
Yes
Yes
Inform Public
No
Clean Sewer. Pg. 2
Do not clean sewer
Follow up with City of Albuquerque, Bernalillo County or NMED
Remediation Complete. Pg. 1
City of Albuquerque Code Enforcement
Residential
(505) 924-3823
(505) 924-3826
(505) 924-3451
Commercial
Joe Martinez (Nuisance Abatement)
Office: (505) 768-4649
Cell: (505) 977-0681
Bernalillo County
Natural Resource Services
Review & Permitting Section
(505) 314-0375
NMED
Liquid Waste Program (505) 222-9500
(505)428-6535
Note: The identified code enforcement contacts will also be utilized to report private service lines issues resulting in sewage spills to private or public property.
Public and private lines may be differentiated on the Water Authority GIS Mapping.
Private lines that may be confused with Water Authority mains should be identified to the Collection Section Research Analyst for inclusion in the "Waste Water Non-Authority" layer.


Follow up study and mitigation. Pg. 1
Planner / Scheduler creates a CCTV work order for gravity 10-40s, -42s, and 48s.
Sewer line is televised.*
Planner Scheduler alerts Research Analyst: CCTV complete and data available.
Research Analyst compiles maps and data associated with all unstudied 10-42s and -48s for SSO Study Team Meeting.
Research Analyst studies SSOs. Obvious cause?
No
SSO Team examine/ request more data/ resolve.
Yes
Consent List
SSO Team accepts/ requests further study
* Some things get fixed without going to Collection System Manager.
Consensus cause. Consensus mitigation.
Research Analyst compiles SSO cause and mitigation
Accepted Cause. Accepted Mitigation.
Mitigation
Non-FOG
Submit to collection section manager for approval.
FOG
Submit to Pretreatment for enforcement. Pg. 8
End of Pretreatment involvement. Pg. 8
Compile data in SSO Analysis Table for inclusion in CMOM Report.
Collection Section Manager approves and routes for implementation.*
SSO Tracking Table



GWQB Reporting

Ponded sewage on a pervious area may require additional reporting to the Ground Water Quality Bureau (GWQB). Circumstances presumed to require this reporting will be:

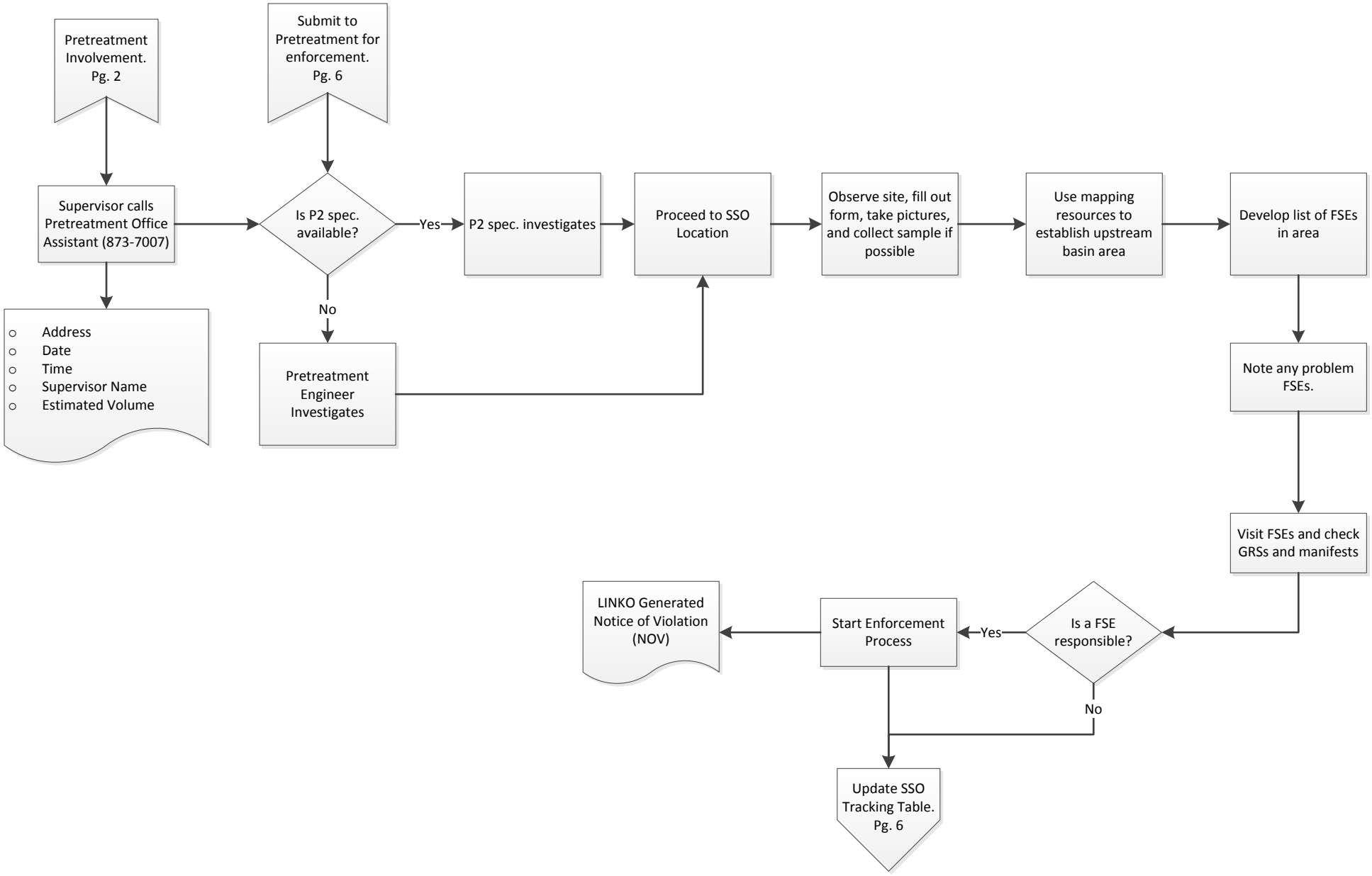
1. A sewage spill that:

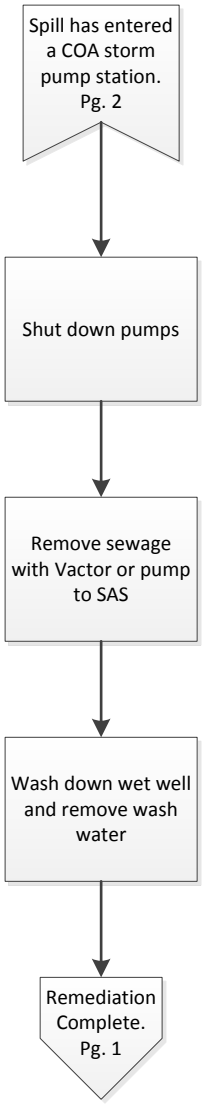
a. Is ponded for more than 24 hours and,

b. At a depth of more than 12 inches over an area of more than 0.1 acre.

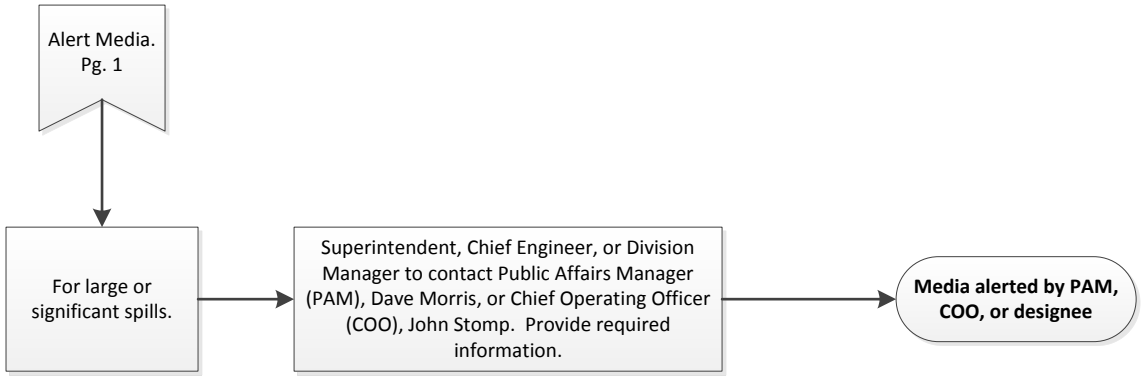
The normal 24-hour call to NMED Surface Water is presumed to meet the requirement for a 24-hour notification to the GWQB. The Collection Section Manager shall be notified and shall be responsible for preparing the following additional reporting:

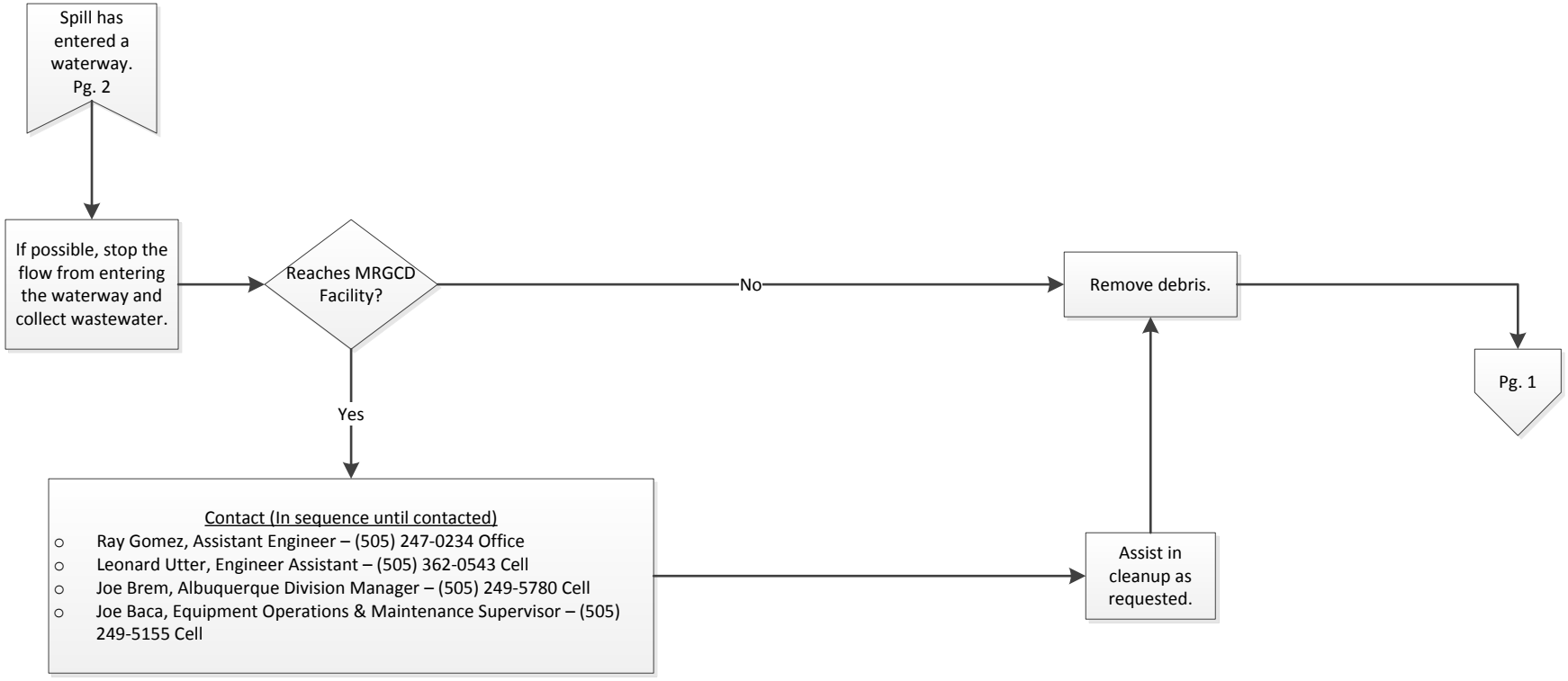
1. One week written report. Presumed the same as the five day report provided to NMED Surface Water.
2. 15-day Corrective Action Report.


Pretreatment Involvement. Pg. 2
Submit to Pretreatment for enforcement. Pg. 6
Supervisor calls Pretreatment Office Assistant (873-7007)
Is P2 spec. available?
Yes
P2 spec. investigates
Proceed to SSO Location
Observe site, fill out form, take pictures, and collect sample if possible
Use mapping resources to establish upstream basin area
Develop list of FSEs in area
Address
Date
Time
Supervisor Name
Estimated Volume
No
Pretreatment Engineer Investigates
Note any problem FSEs.
Visit FSEs and check GRSs and manifests
LINKO Generated Notice of Violation (NOV)
Start Enforcement Process
Yes
Is a FSE responsible?
No
Update SSO Tracking Table. Pg. 6



Note: Process shown is for typical spills. Some spills may require a joint response with the City of Albuquerque in which the spill is captured, treated, and determined appropriate for release.


Alert Media. Pg. 1
For large or significant spills.
Superintendent, Chief Engineer, or Division Manager to contact Public Affairs Manager (PAM), Dave Morris, or Chief Operating Officer (COO), John Stomp. Provide required information.
Media alerted by PAM, COO, or designee


Spill has entered a waterway. Pg. 2
If possible, stop the flow from entering the waterway and collect wastewater.
Reaches MRGCD Facility?
No
Remove debris.
Pg. 1
Yes
Contact (In sequence until contacted)
Ray Gomez, Assistant Engineer – (505) 247-0234 Office
Leonard Utter, Engineer Assistant – (505) 362-0543 Cell
Joe Brem, Albuquerque Division Manager – (505) 249-5780 Cell
Joe Baca, Equipment Operations & Maintenance Supervisor – (505) 249-5155 Cell
Assist in cleanup as requested.

Appendix 4 Administrative Order

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

JUL 22 2014

CERTIFIED MAIL–RETURN RECEIPT REQUESTED: 7005 1820 0003 7451 3721

Mr. John M. Stomp III, P.E.
Chief Operating Officer, Water Utility Authority
Albuquerque Bernalillo County Water Utility Authority
4201 Second Street SW
Albuquerque, NM 87105

Re: Administrative Order, Docket Number: CWA-06-2014-1817
NPDES Permit Number: NM0022250

Dear Mr. Stomp:

Enclosed is an Administrative Order (AO) issued to the Albuquerque Bernalillo County Water Utility Authority for violation of the Clean Water Act (CWA) (33 U.S.C. § 1251 et seq.). Violations were identified during a compliance file review of your wastewater treatment facility, conducted by the Environmental Protection Agency (EPA). The violations alleged are for an exceedance of effluent limitations and unauthorized discharges.

The AO does not assess a monetary penalty; however, it does require compliance with applicable federal regulations. The first compliance deadline is within thirty days of receipt of the AO. The AO also contains other compliance deadlines and information demands. EPA is committed to ensuring compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) program, and my staff will assist you in any way possible. Please reference AO Docket Number CWA-06-2014-1817 and NPDES Permit Number NM0022250 on your response.

If you have any questions, please contact Robert Houston, of my staff, at (214) 665-8565.

Sincerely,

John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosures

cc: Mr. Bruce Yurdin,
Acting Bureau Chief
Surface Water Quality Bureau
New Mexico Environment Department

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1445 Ross Avenue, Suite 1200, Dallas, TX 75202
FINDINGS OF VIOLATION AND COMPLIANCE ORDER AND INFORMATION DEMAND
Docket Number: CWA-06-2014-1817; NPDES Permit Number: NM0022250

STATUTORY AUTHORITY

The following findings are made, and Order issued, under the authority vested in the Administrator of the United States Environmental Protection Agency ("EPA"), by Sections 308 and 309(a) of the Clean Water Act ("the Act"), 33 U.S.C. §§ 1318 and 1319(a). The Administrator of EPA delegated the authority to issue this Order to the Regional Administrator of EPA Region 6, who further delegated this authority to the Director of the Compliance Assurance and Enforcement Division.

FINDINGS

1. The Albuquerque Bernalillo County Water Utility Authority ("Respondent") is a "person," as that term is defined at Section 502(5) of the Act, 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2.

2. At all times relevant to this Order ("all relevant times"), Respondent owned or operated a wastewater treatment plant ("WWTP"), located on Second Street in the City of Albuquerque, Bernalillo County, New Mexico ("facility"), and was, therefore, an "owner or operator" within the meaning of 40 C.F.R. § 122.2. The mailing address for Respondent is 4201 Second Street SW, Albuquerque, NM 87105.

3. At all relevant times, the facility acted as a "point source" of a "discharge" of "pollutants" with its municipal wastewater to the receiving waters of the Rio Grande in Segment 20.6.4.105 of the Rio Grande Basin, which is considered a "water of the United States" within the meaning of Section 502 of the Act, 33 U.S.C. § 1362, and 40 C.F.R. § 122.2.

4. Because Respondent owned or operated a facility that acted as a point source of discharges of pollutants to waters of the United States, Respondent and the facility were subject to the Act and the National Pollutant Discharge Elimination System ("NPDES") program.

5. Under Section 301 of the Act, 33 U.S.C. § 1311, it is unlawful for any person to discharge any pollutant from a point source to waters of the United States, except with the authorization of, and in compliance with, an NPDES permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342.

6. Section 402(a) of the Act, 33 U.S.C. § 1342(a), provides that the Administrator of EPA may issue permits under the NPDES program for the discharge of pollutants from point sources to waters of the United States. Any such discharge is subject to the specific terms and conditions prescribed in the applicable permit.

7. Respondent applied for and was issued NPDES Permit Number NM0022250 ("permit") under Section 402 of the Act, 33 U.S.C. § 1342, which became effective on October 1, 2012. At all relevant times, Respondent was authorized to discharge pollutants from the facility to waters of the United States only in compliance with the specific terms and conditions of the permit.

8. Part I.A of the permit places certain limitations on the quality and quantity of effluent discharged by the Respondent. The relevant discharge limitations are listed in Attachment A, which is incorporated herein by reference.

9. Parts III.C and III.D of the permit require Respondent to sample and test its effluent and monitor its compliance with permit conditions according to specific procedures, in order to determine the facility's compliance or noncompliance with the permit and applicable regulations. They also require Respondent to file with EPA certified Discharge Monitoring Reports ("DMRs") of the results of monitoring, and Noncompliance Reports when appropriate.

10. Certified DMRs filed by Respondent with EPA in compliance with the permit show discharges of pollutants from the facility that exceed the permitted effluent limitations established in I.A of the permit. The discharge of pollutants that exceed the permit limitations are specified in Attachment B, which is incorporated herein by reference.

11. Sanitary Sewer Overflow ("SSO") reports, filed by Respondent with EPA in compliance with the permit, show unauthorized discharges. The unauthorized discharges are specified in Attachment C, which is incorporated herein by reference.

12. Each instance in which Respondent discharged pollutants to waters of the United States in amounts exceeding the effluent limitations contained in the permit was a violation of the permit and Section 301 of the Act, 33 U.S.C. § 1311. Each violation of the conditions of the permit or regulations described above is a violation of Section 301 of the Act, 33 U.S.C. § 1311.

SECTION 309(a)(3) COMPLIANCE ORDER

Based on the foregoing Findings and pursuant to the authority of Section 309(a)(3) of the Act, 33 U.S.C. § 1319(a)(3), EPA hereby orders Respondent to take the following actions:

A. Within thirty (30) days of the effective date of this Order, Respondent shall take such steps as necessary to comply with the effluent limitation provisions of the permit cited herein.

SECTION 308 INFORMATION DEMAND

Based on the foregoing Findings and pursuant to the authority of Section 308 of the Act, 33 U.S.C. § 1318 Respondent is required to do the following:

A. Within thirty (30) days of the effective date of this Order, Respondent must certify compliance with the terms and conditions of the permit.

B. Within thirty (30) days of the effective date of this Order, Respondent shall provide written certification to EPA, Region 6 that the violations cited herein have been corrected and the facility is in compliance with the requirements of the permit.

C. In the event that Respondent believes complete correction of the violations cited herein is not possible within thirty (30) days of the effective date of this Order, Respondent shall, within thirty (30) days of the effective date of this Order, submit a comprehensive written plan for the elimination of the cited violations within the shortest possible time. Such plan shall describe in detail the specific corrective actions to be taken and why such actions are sufficient to correct the violations. The plan shall include a detailed schedule for the elimination of the violations within the shortest possible time, as well as measures to prevent these or similar violations from recurring.

D. If Respondent would like to arrange a meeting with EPA to discuss the allegations in this Section 309(a)(3) Compliance Order or the Section 308 Information Demand, it should contact EPA within forty-five (45) days of the effective date of this Order. The meeting will be held at the Region 6 offices, 1445 Ross Ave., Dallas, Texas, and Respondent can provide any information it believes is relevant to this Order. Respondent shall submit to EPA all information or materials it considers relevant to EPA at least ten (10) days prior to the meeting.

E. To arrange a meeting, or to ask questions or comment on this matter, please contact Robert Houston, of my staff, at (214) 665-8565.

F. Any information or correspondence submitted by the Respondent to EPA under this Order shall be addressed to the following:

Gladys Gooden-Jackson
Water Enforcement Branch (6EN-WC)
EPA, Region 6
1445 Ross Ave., Suite 1200
Dallas, TX 75202-2733

GENERAL PROVISIONS

Respondent may seek federal judicial review of the Order pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706. Section 706, which is set forth at http://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title5-section706&num=0&edition=prelim, states the scope of such review.

Issuance of the Section 309(a)(3) Compliance Order and the Section 308 Information Demand shall not be deemed an election by EPA to forego any administrative or judicial, civil or criminal action to seek penalties, fines, or any other relief appropriate under the Act for the violations cited herein, or other violations that become known. EPA reserves the right to seek any remedy available under the law that it deems appropriate.

Failure to comply with this Section 309(a)(3) Compliance Order, Section 308 Information Demand, or the Act can result in further administrative action, or a civil judicial action initiated by the United States Department of Justice.

This Order does not constitute a waiver or modification of the terms or conditions of Respondent's NPDES permit, which remain in full force and effect. Compliance with the terms and conditions of this Order does not relieve Respondent of its obligation to comply with any applicable federal, state, or local law or regulation.

The effective date of this Order is the date it is received by the Respondent.

7·22·14
Date

John Blevins
Director
Compliance Assurance and
Enforcement Division

LIMITATIONS AND MONITORING REQUIREMENTS

1. INTERIM Effluent Limits - New Mexico WQS - Mercury - 76 MGD Design Flow

During the period beginning on the effective date of the permit and lasting until 36-months from the effective date of the permit, the Permittee is authorized to discharge treated municipal waste water to the Rio Grande in segment number 20.6.4.105 of the Rio Grande Basin. Such discharges shall be limited and monitored by the Permittee as specified below:

EFFLUENT CHARACTERISTIC	DISCHARGE LIMITATIONS (lbs/day, unless stated) (mg/l, unless stated)						MONITORING REQUIREMENTS	
	Storet Code	30-Day Average	7-Day Average	30-Day Average	7-Day Average	Daily Maximum	Measurement Frequency	Sample Type
YEAR ROUND LIMITATIONS								
Effluent Flow, Discharge	50050	Report MGD	Report MGD	***	***	N/A	Continuous	Totalizing Meter
Flow, Rio Grande, Qs4D (*1)	00056	Report MGD	Report MGD	***	***	N/A	Daily (*1)	Record (*1)
Total Suspended Solids	00530	19015	28522	30	45	N/A	Once/Day	24-Hour Composite
Boron, Total (*2)	01022	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Boron, Dissolved (*2)	01020	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Molybdenum, Total (*2)	01062	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Molybdenum, Dissolved (*2)	01060	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Arsenic, Total (*2)	01002	8.7	9.6 (*7)	13.7 ug/l	N/A	15.2 ug/l	Once/Week	24-Hour Composite
Mercury, Total (*2)	71900	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Fecal Coliform Bacteria (Colonies / 100 ml)	74055	N/A	N/A	100	N/A	200	Once/Day	24-Hour Composite
Total Residual Chlorine, TRC	50060	N/A	N/A	N/A	N/A	0.011 (*3)	Once/Day	Instantaneous Grab (*4)
pH, Minimum/Maximum Values, Standard Units	00400	N/A	N/A	6.6 min.	9.0 max.	N/A	Once/Day	Grab
JULY 1 - OCTOBER 31 LIMITATIONS								
Carbonaceous Biochemical Oxygen Demand (5-Day)	80082							
Qs4D < 34.6 MGD (*a)		5071	7,606	8	12	N/A	Once/Day	24-Hour Composite
Qs4D ≥ 34.6 MGD (*d)		9508	14261	15	22.5	N/A	Once/Day	24-Hour Composite
Dissolved Oxygen (minimum)	00300	N/A	N/A	4	N/A	N/A	Once/Day	24-Hour Composite
Ammonia Nitrogen, Total (as N)	00610	634	951 (*7)	1	N/A	1.5	Once/Day	24-Hour Composite

EFFLUENT CHARACTERISTIC	DISCHARGE LIMITATIONS (lbs/day, unless stated) (mg/l, unless noted) (or as noted)						MONITORING REQUIREMENTS	
	Storet Code	30-Day Average	7-Day Average	30-Day Average	7-Day Average	Daily Maximum	Measurement Frequency	Sample Type
JULY 1 - OCTOBER 31 LIMITATIONS (cont)								
Nitrate Nitrogen, Total (as N)	00620							
Qs4D < 34.6 MGD (*a)		5071	5071 (*7)	8	N/A	8	Once/Week	24-Hour Composite
Qs4D ≥ 34.6 MGD (*d)		7606	7606 (*7)	12	N/A	12	Once/Week	24-Hour Composite
Total Inorganic Nitrogen (*8)	00640	Report	Report	Report	N/A	Report	Once/Week	24-Hour Composite
Whole Effluent Lethality (*5)	22414			min. (*6)	min.			
7-Day NOEC								
Qs4D <34.6 MGD (*a)								
Ceriodaphnia dubia		—	—	100%(*6)	100%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	100%(*6)	100%	N/A	1/Quarter	24-Hour Composite
Qs4D ≥ 34.6 MGD (*d)								
Ceriodaphnia dubia		—	—	69%(*6)	69%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	69%(*6)	69%	N/A	1/Quarter	24-Hour Composite
NOVEMBER 1 - JUNE 30 LIMITATIONS								
Carbonaceous Biochemical Oxygen Demand (5-Day)	80082							
Qs4D < 34.6 MGD (*a)		6338	7606	8	12	N/A	Once/Day	24-Hour Composite
34.6 MGD ≤ Qs4D < 183 MGD (*b)		9508	14261	15	22.5	N/A	Once/Day	24-Hour Composite
Qs4D ≥ 183 MGD (*c)		15846	25354	25	40	N/A	Once/Day	24-Hour Composite
Dissolved Oxygen (minimum)		00300						
Qs4D < 183 MGD (*e)		N/A	N/A	4	N/A	N/A	Once/Day	24-Hour Composite
Qs4D $ 183 MGD (*c)		N/A	N/A	2	N/A	N/A	Once/Day	24-Hour Composite
Ammonia Nitrogen, Total (as N)	00610							
Qs4D < 183 MGD (*e)		634	951 (*7)	1	N/A	1.5	Once/Day	24-Hour Composite
Qs4D ≥ 183 MGD (*c)		1901	2852 (*7)	3	N/A	4.5	Once/Day	24-Hour Composite
Nitrate Nitrogen, Total (as N)	00620							
Qs4D < 36.6 MGD (*a)		5071	N/A	8	N/A	8	Once/Week	24-Hour Composite
34.6 MGD ≤ Qs4D < 183 MGD (*b)		7606	N/A	12	N/A	12	Once/Week	24-Hour Composite
Qs4D ≥ 183 MGD (*c)		15846	N/A	25	N/A	N/A	Once/Week	24-Hour Composite
Total Inorganic Nitrogen (*8)	00640	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite

EFFLUENT CHARACTERISTIC	DISCHARGE LIMITATIONS (lbs/day, unless stated) (mg/l, unless noted) (or as noted)						MONITORING REQUIREMENTS	
	Storet Code	30-Day Average	7-Day Average	30-Day Average	7-Day Average	Daily Maximum	Measurement Frequency	Sample Type
NOVEMBER 1 - JUNE 30								
LIMITATIONS (cont)								
Whole Effluent Lethality (*5)	22414			min. (*6)	min.			
7-Day NOEC								
Qs4D <34.6 MGD (*a)								
Ceriodaphnia dubia		—	—	100% (*6)	100%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	100% (*6)	100%	N/A	1/Quarter	24-Hour Composite
34.6 MGD ≤ Qs4D < 183 MGD (*b)								
Ceriodaphnia dubia		—	—	69%(*6)	69%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	69%(*6)	69%	N/A	1/Quarter	24-Hour Composite
Qs4D ≥ 183 MGD (*c)								
Ceriodaphnia dubia		—	—	29%(*6)	29%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	29%(*6)	29%	N/A	1/Quarter	24-Hour Composite

FOOTNOTES

(*1) Qs4D shall be defined as the "four-day average low flow", from the Rio Grande river, taken upstream of the facility. (See Part I.C.8, "Monitoring and Reporting", of the permit for specific conditions and definitions.) The Qs4D will be calculated as each day's daily minimum low flow arithmetically averaged with the three preceding days minimum low-flow rates. For DMR reporting requirements, the facility shall report the monthly average Qs4D and the minimum monthly Qs4D. The monthly Qs4D shall be defined as the arithmetic average of all calculated Qs4D's for the calendar month. The monthly Qs4D will be used to determine the appropriate flow rate for those pollutant limits that are based on either stream flow and/or stream flow and time (season). The minimum monthly Qs4D is the lowest Qs4D that occurs during the calendar month.

(*2) If any individual analytical test result for Arsenic, Boron, Mercury, Molybdenum, and Nitrate is less than the minimum quantification level (MQL) listed below, then a value of zero (0) may be used for that test result for the discharge monitoring report (DMR) calculations and reporting requirements.

Pollutant	MQL, ug/L
Arsenic	10
Boron	100
Mercury	0.2
Molybdenum	30
Nitrate	100

(*3) NO MEASURABLE will be defined as no detectable concentration of TRC as determined by any approved method established in 40 CFR 136. If during the term of this permit the minimum quantification limit for TRC becomes less than 0.011 mg/l, then 0.011 mg/l shall become the effluent limitation. The effluent limitation for TRC is the instantaneous maximum and cannot be averaged for reporting purposes.

(*4) For the purposes of TRC reporting, "instantaneous grab" is defined in 40 CFR Part 136 as being measured within fifteen (15) minutes after sampling.

FOOTNOTES (cont.)

(*5) Compliance with the Whole Effluent Toxicity limitations is required on the effective date of this permit. See PART II, Section B, Whole Effluent Toxicity Limits for additional WET monitoring and reporting conditions.
The NOEC is defined as the greatest effluent concentration which does not elicit lethality that is statistically different from the control (0% effluent) at the 95% confidence level. The 30-day average minimum and the 7-day minimum lethality values shall not be less than the limits listed in the Tables.

(*6) If more than one valid test for a species was performed during the reporting period, the test NOEC's will be averaged arithmetically and reported as the 30-day average minimum NOEC for that reporting period.

(*7) These are daily maximum loading limits, and are based on the daily maximum concentrations.

(*8) Total Inorganic Nitrogen (TIN) shall be calculated as the sum of: Ammonia (NH3) + Ammonium (NH4) + Nitrate (NO3) + Nitrite (NO2)

(*a) Qs4D < 34.6 MGD: Qs4D is less than 34.6 MGD (53.7 cfs).

(*b) 34.6 MGD ≤ Qs4D < 183 MGD: Qs4D is greater than or equal to 34.6 MGD (53.7 cfs), and less than 183 MGD (283 cfs).

(*c) Qs4D ≥ 183 MGD: Qs4D is greater than or equal to 183 MGD (283 cfs)

(*d) Qs4D ≥ 34.6 MGD: Qs4D is greater than or equal to 34.6 MGD.

(*e) Qs4D < 183 MGD: Qs4D is less than 183 MGD.

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

2. INTERIM Effluent Limits - Pueblo of Isleta WQS - Arsenic and Total Inorganic Nitrogen - 76 MGD Design Flow

During the period beginning on the effective date of the approval of the 2002 Pueblo of Isleta WQS, and lasting for no longer than three years, the permittee is authorized to discharge treated municipal waste water to the Rio Grande in segment number 20.6.4.105 of the Rio Grande Basin. Such discharges shall be limited and monitored by the permittee as specified below:

EFFLUENT CHARACTERISTIC	DISCHARGE LIMITATIONS (lbs/day, unless stated) (mg/l, unless stated)						MONITORING REQUIREMENTS	
	Storet Code	30-Day Average	7-Day Average	30-Day Average	7-Day Average	Daily Maximum	Measurement Frequency	Sample Type
YEAR ROUND LIMITATIONS								
Effluent Flow, Discharge	50050	Report MGD	Report MGD	***	***	N/A	Continuous	Totalizing Meter
Flow, Rio Grande, Qs4D (*1)	00056	Report MGD	Report MGD	***	***	N/A	Daily (*1)	Record (*1)
Total Suspended Solids	00530	19015	28522	30	45	N/A	Once/Day	24-Hour Composite
Boron, Total (*2)	01022	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Boron, Dissolved (*2)	01020	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Molybdenum, Total (*2)	01062	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Molybdenum, Dissolved (*2)	01060	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Arsenic, Total (*2)	01002	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Mercury, Total (*2)	71900	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Fecal Coliform Bacteria (Colonies / 100 ml)	74055	N/A	N/A	100	N/A	200	Once/Day	24-Hour Composite
Total Residual Chlorine, TRC	50060	N/A	N/A	N/A	N/A	0.011 (*3)	Once/Day	Instantaneous Grab (*4)
pH, Minimum/Maximum Values, Standard Units	00400	N/A	N/A	6.6 min.	9.0 max.	N/A	Once/Day	Grab
JULY 1 - OCTOBER 31 LIMITATIONS								
Carbonaceous Biochemical Oxygen Demand (5-Day)	80082							
Qs4D < 34.6 MGD (*a)		5071	7,606	8	12	N/A	Once/Day	24-Hour Composite
Qs4D ≥ 34.6 MGD (*d)		9508	14261	15	22.5	N/A	Once/Day	24-Hour Composite
Dissolved Oxygen (minimum)	00300	N/A	N/A	4	N/A	N/A	Once/Day	24-Hour Composite
Ammonia Nitrogen, Total (as N)	00610	634	951 (*7)	1	N/A	1.5	Once/Day	24-Hour Composite

EFFLUENT CHARACTERISTIC	DISCHARGE LIMITATIONS (lbs/day, unless stated) (mg/l, unless noted) (or as noted)						MONITORING REQUIREMENTS	
	Storet Code	30-Day Average	7-Day Average	30-Day Average	7-Day Average	Daily Max.	Measurement Frequency	Sample Type
JULY 1 - OCTOBER 31 LIMITATIONS								
Nitrate Nitrogen, Total (as N)	00620							
Qs4D < 34.6 MGD (*a)		5071	5071 (*7)	8	N/A	8	Once/Week	24-Hour Composite
Qs4D ≥ 34.6 MGD (*d)		7606	7606 (*7)	12	N/A	12	Once/Week	24-Hour Composite
Total Inorganic Nitrogen (*8)	00640	Report	Report	Report	N/A	Report	Once/Week	24-Hour Composite
Whole Effluent Lethality (*5)	22414			min. (*6)	min.			
7-Day NOEC								
Qs4D <53.7 MGD (*a)								
Ceriodaphnia dubia		—	—	100% (*6)	100%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	100% (*6)	100%	N/A	1/Quarter	24-Hour Composite
Qs4D ≥ 53.7 MGD (*d)								
Ceriodaphnia dubia		—	—	69% (*6)	69%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	69% (*6)	69%	N/A	1/Quarter	24-Hour Composite
NOVEMBER 1 - JUNE 30 LIMITATIONS								
Carbonaceous Biochemical Oxygen Demand (5-Day)	80082							
Qs4D < 34.6 MGD (*a)		6338	7606	8	12	N/A	Once/Day	24-Hour Composite
34.6 MGD ≤ Qs4D < 183 MGD (*b)		9508	14261	15	22.5	N/A	Once/Day	24-Hour Composite
Qs4D ≥ 183 MGD (*c)		15846	25354	25	40	N/A	Once/Day	24-Hour Composite
Dissolved Oxygen (minimum)	00300							
Qs4D < 183 MGD (*e)		N/A	N/A	4	N/A	N/A	Once/Day	24-Hour Composite
Qs4D ≥ 183 MGD (*c)		N/A	N/A	2	N/A	N/A	Once/Day	24-Hour Composite
Ammonia Nitrogen, Total (as N)	00610							
Qs4D < 183 MGD (*e)		634	951 (*7)	1	N/A	1.5	Once/Day	24-Hour Composite
Qs4D ≥ 183 MGD (*c)		1901	2852 (*7)	3	N/A	4.5	Once/Day	24-Hour Composite
Nitrate Nitrogen, Total (as N)	00620							
Qs4D < 34.6 MGD (*a)		5071	N/A	8	N/A	8	Once/Week	24-Hour Composite
34.6 MGD ≤ Qs4D < 183 MGD (*b)		7606	N/A	12	N/A	12	Once/Week	24-Hour Composite
Qs4D ≥ 183 MGD (*c)		15846	N/A	25	N/A	N/A	Once/Week	24-Hour Composite
Total Inorganic Nitrogen (*8)	00640	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite

EFFLUENT CHARACTERISTIC	DISCHARGE LIMITATIONS (lbs/day, unless stated) (mg/l, unless noted) (or as noted)						MONITORING REQUIREMENTS	
	Storet Code	30-Day Average	7-Day Average	30-Day Average	7-Day Average	Daily Max.	Measurement Frequency	Sample Type
NOVEMBER 1 - JUNE 30 LIMITATIONS (cont)								
Whole Effluent Lethality (*5)	22414			min. (*6)	min.			
7-Day NOEC								
Qs4D <34.6 MGD (*a)								
Ceriodaphnia dubia		—	—	100% (*6)	100%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	100% (*6)	100%	N/A	1/Quarter	24-Hour Composite
34.6 MGD ≤ Qs4D < 183 MGD (*b)								
Ceriodaphnia dubia		—	—	69% (*6)	69%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	69% (*6)	69%	N/A	1/Quarter	24-Hour Composite
Qs4D ≥ 183 MGD (*c)								
Ceriodaphnia dubia		—	—	29% (*6)	29%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	29% (*6)	29%	N/A	1/Quarter	24-Hour Composite

FOOTNOTES

(*1) Qs4D shall be defined as the "four-day average low flow", from the Rio Grande river, taken upstream of the facility. (See Part I.C.8, "Monitoring and Reporting", of the permit for specific conditions and definitions.) The Qs4D will be calculated as each day's daily minimum low flow arithmetically averaged with the three preceding days minimum low-flow rates. For DMR reporting requirements, the facility shall report the monthly average Qs4D and the minimum monthly Qs4D. The monthly Qs4D shall be defined as the arithmetic average of all calculated Qs4D's for the calendar month. The monthly Qs4D will be used to determine the appropriate flow rate for those pollutant limits that are based on either stream flow and/or stream flow and time (season). The minimum monthly Qs4D is the lowest Qs4D that occurs during the calendar month.

(*2) If any individual analytical test result for Arsenic, Boron, Mercury, Molybdenum, and Nitrate is less than the minimum quantification level (MQL) listed below, then a value of zero (0) may be used for that test result for the discharge monitoring report (DMR) calculations and reporting requirements.

Pollutant	MQL, ug/L
Arsenic	10
Boron	100
Mercury	0.2
Molybdenum	30
Nitrate	100

(*3) NO MEASURABLE will be defined as no detectable concentration of TRC as determined by any approved method established in 40 CFR 136. If during the term of this permit the minimum quantification limit for TRC becomes less than 0.011 mg/l, then 0.011 mg/l shall become the effluent limitation. The effluent limitation for TRC is the instantaneous maximum and cannot be averaged for reporting purposes.

(*4) For the purposes of TRC reporting, "instantaneous grab" is defined in 40 CFR Part 136 as being measured within fifteen (15) minutes after sampling.

(*5) compliance with the Whole Effluent Toxicity limitations is required on the effective date of this permit. See PART II, Section B, Whole Effluent Toxicity

Limits for additional WET monitoring and reporting conditions.
The NOEC is defined as the greatest effluent concentration which does not elicit lethality that is statistically different from the control (0% effluent) at the 95% confidence level. The 30-day average minimum and the 7-day minimum lethality values shall not be less than the limits listed in the Tables.

(*6) If more than one valid test for a species was performed during the reporting period, the test NOEC's will be averaged arithmetically and reported as the 30-day average minimum NOEC for that reporting period.

(*7) These are daily maximum loading limits, and are based on the daily maximum concentrations.

(*8) Total Inorganic Nitrogen (TIN) shall be calculated as the sum of: Ammonia (NH3) + Ammonium (NH4) + Nitrate (NO3) + Nitrite (NO2)

(*a) Qs4D < 34.6 MGD: Qs4D is less than 34.6 MGD (53.7 cfs).

(*b) 34.6 MGD ≤ Qs4D < 183 MGD: Qs4D is greater than or equal to 34.6 MGD (53.7 cfs), and less than 183 MGD (283 cfs).

(*c) Qs4D ≥ 183 MGD: Qs4D is greater than or equal to 183 MGD (283 cfs).

(*d) Qs4D ≥ 34.6 MGD: Qs4D is greater than or equal to 34.6 MGD.

(*e) Qs4D < 183 MGD: Qs4D is less than 183 MGD.

EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

3. FINAL Effluent Limits - 76 MGD Design Flow

During the period starting three years after the Pueblo of Isleta WQS have been approved, and lasting until the permit expiration date, the permittee is authorized to discharge treated municipal waste water to the Rio Grande in segment number 20.6.4.105 of the Rio Grande Basin. Such discharges shall be limited and monitored by the permittee as specified below:

EFFLUENT CHARACTERISTIC	DISCHARGE LIMITATIONS (lbs/day, unless stated) (mg/l, unless stated) (unless noted)						MONITORING REQUIREMENTS	
	Storet Code	30-Day Average	7-Day Average	30-Day Average	7-Day Average	Daily Max.	Measurement Frequency	Sample Type
YEAR ROUND LIMITATIONS								
Effluent Flow, Discharge	50050	Report MGD	Report MGD	***	***		Continuous	Totalizing Meter
Flow, Rio Grande, Qs4D (*1)	00056	Report MGD	Report MGD	***	**		Daily (*1)	Record (*1)
Total Suspended Solids	00530	19,015	28,552	30	45	N/A	Once/Day	24-Hour Composite
Boron, Total (*2)	01022	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Boron, Dissolved (*2)	01020	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Molybdenum, Total (*2)	01062	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Molybdenum, Dissolved (*2)	01060	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Arsenic, Total (*2)	01002	Report	Report (*7)	Report	N/A	Report	Once/Week	24-Hour Composite
Mercury, Total (*2)	71900							
Qs4D <53.7 MGD (*a)		0.0051	0.008	0.008 ug/l	N/A	0.012 ug/l	Once/Week	24-Hour Composite
Qs4D ≥ 53.7 MGD (*d)		0.007	0.011	0.012 ug/l	N/A	0.017 ug/l	Once/Week	24-Hour Composite
Fecal Coliform Bacteria (Colonies / 100 ml)	74055	N/A	N/A	100	N/A	200	Once/Day	24-Hour Composite
Total Residual Chlorine, TRC	50060	N/A	N/A	N/A	N/A	0.011(*3)	Once/Day	Instantaneous Grab (*4)
pH, Minimum/Maximum Values, Standard Units	00400	N/A	N/A	6.6 min.	9.0 max.	N/A	Once/Day	Grab
JULY 1 - OCTOBER 31 LIMITATIONS								
Carbonaceous Biochemical Oxygen Demand (5-Day)	80082							
Qs4D < 34.6 MGD (*a)		5071	7606	8	12	N/A	Once/Day	24-Hour Composite
Qs4D ≥ 34.6 MGD (*d)		9508	14261	15	22.5	N/A	Once/Day	24-Hour Composite

EFFLUENT CHARACTERISTIC	DISCHARGE LIMITATIONS (lbs/day, unless stated) (mg/l, unless stated) (unless noted)						MONITORING REQUIREMENTS	
	Storet Code	30-Day Average	7-Day Average	30-Day Average	7-Day Average	Daily Max.	Measurement Frequency	Sample Type
JULY 1 - OCTOBER 31 LIMITATIONS (cont)								
Dissolved Oxygen (minimum)	00300	N/A	N/A	4	N/A	N/A	Once/Day	24-Hour Composite
Ammonia Nitrogen, Total (as N)	00610	634	951	1 (*7)	N/A	1.5	Once/Day	24-Hour Composite
Total Inorganic Nitrogen (*8)	00640							
Qs4D < 34.6 MGD (*a)		4228	N/A	6.67 (*7)	N/A	10	Once/Week	24-Hour Composite
Qs4D ≥ 34.6 MGD (*d)		6155	N/A	9.71 (*7)	N/A	14.56	Once/Week	24-Hour Composite
Whole Effluent Lethality (*5)	22414			min. (*6)	min.			
7-Day NOEC								
Qs4D <53.7 MGD (*a)								
Ceriodaphnia dubia		—	—	100% (*6)	100%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	100% (*6)	100%	N/A	1/Quarter	24-Hour Composite
Qs4D ≥ 34.6 MGD (*d)								
Ceriodaphnia dubia		—	—	69% (*6)	69%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	69% (*6)	69%	N/A	1/Quarter	24-Hour Composite
NOVEMBER 1 - JUNE 30 LIMITATIONS								
Carbonaceous Biochemical Oxygen Demand (5-Day)	80082							
Qs4D < 34.6 MGD (*a)		6338	7606	8	12	N/A	Once/Day	24-Hour Composite
34.6 MGD ≤ Qs4D < 183 MGD (*b)		9508	14261	15	22.5	N/A	Once/Day	24-Hour Composite
Qs4D $ 183 MGD (*c)		15846	25354	25	40	N/A	Once/Day	24-Hour Composite
Dissolved Oxygen (minimum)	00300							
Qs4D < 183 MGD (*e)		N/A	N/A	4	N/A	N/A	Once/Day	24-Hour Composite
Qs4D ≥ 183 MGD (*c)		N/A	N/A	2	N/A	N/A	Once/Day	24-Hour Composite
Ammonia Nitrogen, Total (as N)	00610							
Qs4D < 183 MGD (*e)		792	1204	1.25 (*7)	N/A	1.9	Once/Day	24-Hour Composite
Qs4D ≥ 183 MGD (*c)		1901	2852	3 (*7)	N/A	4.5	Once/Day	24-Hour Composite
Total Inorganic Nitrogen (*8)	00640							

Qs4D < 34.6 MGD	4228	N/A	6.67 (*7)	N/A	10	Once/Week	24-Hour Composite
34.6 MGD ≤ Qs4D < 183 MGD	6155	N/A	9.71 (*7)	N/A	14.56	Once/Week	24-Hour Composite
Qs4D $ 183 MGD (*c)	14375	N/A	22.68 (*7)	N/A	34	Once/Week	24-Hour Composite

EFFLUENT CHARACTERISTIC	DISCHARGE LIMITATIONS (lbs/day, unless stated) (mg/l, unless stated) (unless noted)						MONITORING REQUIREMENTS	
	Storet Code	30-Day Average	7-Day Average	30-Day Average	7-Day Average	Daily Max.	Measurement Frequency	Sample Type
NOVEMBER 1 - JUNE 30 LIMITATIONS (cont)								
Whole Effluent Lethality (*5)	22414			min. (*6)	min.			
7-Day NOEC								
Qs4D <34.6 MGD (*a)								
Ceriodaphnia dubia		—	—	100% (*6)	100%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	100% (*6)	100%	N/A	1/Quarter	24-Hour Composite
34.6 MGD ≤ Qs4D < 183 MGD (*b)								
Ceriodaphnia dubia		—	—	69% (*6)	69%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	69% (*6)	69%	N/A	1/Quarter	24-Hour Composite
Qs4D ≥ 183 MGD (*c)								
Ceriodaphnia dubia		—	—	29% (*6)	29%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	29% (*6)	29%	N/A	1/Quarter	24-Hour Composite

FOOTNOTES

(*1) Qs4D shall be defined as the "four-day average low flow", from the Rio Grande river, taken upstream of the facility. (See Part I.C.8, "Monitoring and Reporting", of the permit for specific conditions and definitions.) The Qs4D will be calculated as each day's daily minimum low flow arithmetically averaged with the three preceding days minimum low-flow rates. For DMR reporting requirements, the facility shall report the monthly average Qs4D and the minimum monthly Qs4D. The monthly Qs4D shall be defined as the arithmetic average of all calculated Qs4D's for the calendar month. The monthly Qs4D will be used to determine the appropriate flow rate for those pollutant limits that are based on either stream flow and/or stream flow and time (season). The minimum monthly Qs4D is the lowest Qs4D that occurs during the calendar month.

(*2) If any individual analytical test result for Arsenic, Boron, Mercury, Molybdenum, and Nitrate is less than the minimum quantification level (MQL) listed below, then a value of zero (0) may be used for that test result for the discharge monitoring report (DMR) calculations and reporting requirements.

Pollutant	MQL, ug/l
Arsenic	10
Boron	100
Mercury	0.2
Molybdenum	30
Nitrate	100

(*3) NO MEASURABLE will be defined as no detectable concentration of TRC as determined by any approved method established in 40 CFR 136. If during the term of this permit the minimum quantification limit for TRC becomes less than 0.011 mg/l, then 0.011 mg/l shall become the effluent limitation. The effluent

limitation for TRC is the instantaneous maximum and cannot be averaged for reporting purposes.

FOOTNOTES (cont)

(*4) For the purposes of TRC reporting, "instantaneous grab" is defined in 40 CFR Part 136 as being measured within fifteen (15) minutes after sampling.

(*5) Compliance with the Whole Effluent Toxicity limitations is required on the effective date of this permit. See PART II, Section B, Whole Effluent Toxicity Limits for additional WET monitoring and reporting conditions.
The NOEC is defined as the greatest effluent concentration which does not elicit lethality that is statistically different from the control (0% effluent) at the 95% confidence level. The 30-day average minimum and the 7-day minimum lethality values shall not be less than the limits listed in the Tables.

(*6) If more than one valid test for a species was performed during the reporting period, the test NOEC's will be averaged arithmetically and reported as the 30-day average minimum NOEC for that reporting period.

(*7) These are daily maximum loading limits, and are based on the daily maximum concentrations.

(*8) Total Inorganic Nitrogen (TIN) shall be calculated as the sum of: Ammonia (NH3) + Ammonium (NH4) + Nitrate (NO3) + Nitrite (NO2)

(*a) Qs4D < 34.6 MGD: Qs4D is less than 34.6 MGD (53.7 cfs).

(*b) 34.6 MGD ≤ Qs4D < 183 MGD: Qs4D is greater than or equal to 34.6 MGD (53.7 cfs), and less than 183 MGD (283 cfs).

(*c) Qs4D ≥ 183 MGD: Qs4D is greater than or equal to 183 MGD (283 cfs).

(*d) Qs4D ≥ 34.6 MGD: Qs4D is greater than or equal to 34.6 MGD (53.7 cfs).

(*e) Qs4D < 183 MGD: Qs4D is less than 183 MGD (53.7 cfs).

Date	Outfall	Parameter	Violation	Permit Limit
May 31, 2013	001A	Ammonia Nitrogen, Total Daily Max.	1.6 mg/L	1.5 mg/L
September 30, 2013	001A	Ammonia Nitrogen, Total Daily Max.	1,654 lbs./day	951 lbs./day
September 30, 2013	001A	Ammonia Nitrogen, Total Daily Max.	3.8 mg/L	1.5 mg/L
June 30, 2013	001A	E. coli Bacteria, Daily Max.	119 Colonies/100 ml	88 Colonies/100 ml
September 30, 2013	001A	E. coli Bacteria, Daily Max.	153 Colonies/100 ml	88 Colonies/100 ml
December 31, 2013	001A	Mercury, Total Daily Max.	0.014 ug/L	0.012 ug/L
October 31, 2012	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	1,261 lbs./day	709 lbs./day
November 30, 2012	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	1,235 lbs./day	709 lbs./day
December 31, 2012	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	1,230 lbs./day	709 lbs./day
January 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	1,277 lbs./day	709 lbs./day
February 28, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	1,290 lbs./day	709 lbs./day
March 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	1,107 lbs./day	709 lbs./day
April 30, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	1,557 lbs./day	709 lbs./day
May 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	1,465 lbs./day	709 lbs./day
June 30, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	900 lbs./day	709 lbs./day
July 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	858 lbs./day	709 lbs./day
August 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	854 lbs./day	709 lbs./day
September 30, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	915 lbs./day	709 lbs./day
October 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	898 lbs./day	709 lbs./day
December 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	1,154 lbs./day	709 lbs./day
January 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	1,551 lbs./day	709 lbs./day
February 28, 2014	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	1,082 lbs./day	709 lbs./day

Date	Outfall	Parameter	Violation	Permit Limit
March 31, 2014	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	969 lbs./day	709 lbs./day
April 30, 2014	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	810 lbs./day	709 lbs./day
May 31, 2014	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Avg.	866 lbs./day	709 lbs./day

Attachment C
Unauthorized Discharges

Date	Location	Volume
January 1, 2011	Montano & 4th Street, NW Storm sewer	500 gallons
January 3, 2011	Golf Course Rd, NW Arroyo	500 gallons
February 16, 2011	Moutain Rd, NE Arroyo	500 gallons
February 4, 2011	Larkin Rd., SW Street	100 gallons
February 18, 2011	Candelaria & Morris, NE Street & Storm sewer	100 gallons
March 5, 2011	Coors Blvd, NW	1,000 gallons
March 14, 2011	Kathyrn & Dickerson, SE Street & Storm sewer	100 gallons
March 19, 2011	Wastegate, SW Arroy	1,000 gallons
March 20, 2011	Comache Ave., NE	500 gallons
March 19, 2011	Bluewater & 64th St., NW Street	100 gallons
March 25, 2011	Broadway Blvd., SE Street	500 gallons
March 26, 2011	Pennsylvania & Rhode Island, SE Street	100 gallons
March 27, 2011	Jesse James Dr., SW Storm sewer & Arroyo	500 gallons
March 28, 2011	Mojave St., NW Street	100 gallons
March 28, 2011	Bluewater & 64th St., NW Street & Storm sewer	100 gallons
April 5, 2011	Cathy Ave., NE Storm sewer & Arroyo	500 gallons
April 14, 2011	Broadway Blvd & Avenida Cesar Chavez Street	1,000 gallons
April 19, 2011	Broadway Blvd & Avenida Cesar Chavez Street	1,000 gallons
May 9, 2011	San Diego Ave., NE Street	100 gallons
May 7, 2011	General Stillwell St., NE Arroyo	100 gallons
May 12, 2011	Candaleria & Pitt Street & Storm sewer	100 gallons
May 14, 2011	Columbus Circle, NW Golf Course	500 gallons
June 7, 2011	Avenida de Barranca, NW Street & Storm Sewer	500 gallons
June 10, 2011	Montgomery & Carlisle Street & Arroyo	500 gallons
July 5, 2011	University & Sunport, SE Storm sewer	100 gallons
July 11, 2011	University and Sunport, SE Street & Storm sewer	500 gallons
August 21, 2011	San Pedro & Topke, NE Street	500 gallons
September 13, 2011	Manuel Blvd, NE Storm sewer	500 gallons
October 3, 2011	Sunport & I-25 Storm sewer & Arroyo	1,000 gallons
November 12, 2011	Louisiana Blvd., NE Street	500 gallons
November 18, 2011	San Mateo Blvd., NE Storm sewer	500 gallons
November 24, 2011	Blumenshine & Roseberry, SW Street & Arroyo	1,000 gallons
November 24, 2011	Layton Ave., NE Street	1,000 gallons
December 8, 2011	64th & Bluewater, NW Street & Storm sewer	500 gallons
December 10, 2011	64th & Bluewater, NW Street & Storm sewer	500 gallons
December 24, 2011	Blumenshine & Roseberry, SW Yard & Dirt lot	1,000 gallons
December 31, 2011	Blumenshine & Roseberry, SW Open lot	1,000 gallons
January 3, 2012	Rio Puerco Trail, SW Park	500 gallons
January 3, 2012	Altez St., SE Street	100 gallons
January 14, 2012	Claremont Ave., NE Street	500 gallons
January 14, 2012	64th & Bluewater, NW Street & Storm sewer	100 gallons
January 23, 2012	Griegos Rd, NW Street & Parking Lot	500 gallons
January 25, 2012	Nassau Dr., NE Street	500 gallons

Attachment C
Unauthorized Discharges

Date	Location	Volume
January 29, 2012	Corrales Rd., NW Yard & Parking lot	1,000 gallons
February 9, 2012	Luchetti Road, SW Arroyo	1,000 gallons
February 19, 2012	Chandler Drive, NW Arroyo	100 gallons
February 17, 2012	Sunport Blvd, SE Storm sewer	100 gallons
February 27, 2012	Broadway blvd., NE Storm sewer	1,000 gallons
March 7, 2012	Osuna Road, NE Street	100 gallons
March 10, 2012	Riverview Drive, NW Storm sewer	100 gallons
March 25, 2012	Orfero Trail, NW Arroyo & Street	100 gallons
April 8, 2012	Juan Tabo Blvd., NE Street & Storm Sewer	1,000 gallons
April 5, 2012	Tramway Terrace Loop, NE Street	1,000 gallons
April 19, 2012	Four Hills Rd & Pinon Creek Arroyo	500 gallons
April 22, 2012	Mary Ellen St & Aspen Avenue Street	1,000 gallons
April 25, 2012	Mary Ellen Street Street & storm sewer	1,000 gallons
April 25, 2012	Spence Ave., SE Street	500 gallons
May 19, 2012	Sevilla Avenue, NW Arroyo	1,000 gallons
May 22, 2012	Montgomery Blvd., NE Street & storm sewer	1,000 gallons
May 29, 2012	Eastridge Drive., NE Street	500 gallons
May 26, 2012	Jade park Ave. & Ray Street, NE Street	500 gallons
June 23, 2012	Irving & Rainbow, NW Street	100 gallons
June 28, 2012	Eubank Blvd., NE Street	100 gallons
July 7, 2012	Lafayette Drive, NE Arroyo	500 gallons
July 25, 2012	Taylor Ranch Road, NW Street	500 gallons
July 29, 2012	Wyoming & Comache, NE Street	100 gallons
August 1, 2012	Hidden Valley Drive, SE Street	500 gallons
October 6, 2012	Coors Blvd., NW	500 gallons
October 17, 2012	Lakeview Place, SW	500 gallons
October 26, 2012	Iron Street, SE	50 gallons
October 29, 2012	San Joaquin Ave, SE	500 gallons
October 29, 2012	Richmond Drive, SE	100 gallons
November 1, 2012	Richmond Drive, SE	100 gallons
November 3, 2012	Juan Tabo, NE	500 gallons
November 12, 2012	Kathryn Ave, SE	Unknown
November 12, 2012	Septage Spill - SWRP Septage Site	20 gallons
November 16, 2012	Willow Ct., SE	Unknown
December 3, 2012	Lead Avenue	50 gallons
December 8, 2012	Stagecoach Lane, SE	50 gallons
December 17, 2012	Coal / I-25	50 gallons
December 20, 2012	Lomas Verde Avenue, NE	50 gallons
December 19, 2012	Burmuda & Vienna, NE	100 gallons
December 30, 2012	Horizone Avenue	100 gallons
January 4, 2013	Mt. Rainier Drive, NE	50 gallons
January 4, 2013	7th st. & Candelaria	100 gallons
January 4, 2013	Spanish Bit Street, NE	1,000 gallons

Attachment C
Unauthorized Discharges

Date	Location	Volume
January 10, 2013	Las Casitas Drive, NE	50 gallons
January 13, 2013	Central Avenue, NW	50 gallons
January 12, 2013	Georgia & Summer Avenue, NE	500 gallons
January 12, 2013	Layton Avenue, NE	1,000 gallons
January 16, 2013	Yale & Kathryn, SE	100 gallons
January 15, 2013	Chelwood & Palo Duro, NE	50 gallons
January 17, 2013	Pan American, NE	1,000 gallons
January 20, 2013	Pan American Freeway West, NE	500 gallons
January 19, 2013	Pickard Avenue, NE	50 gallons
January 24, 2013	Cochiti Road, SE	500 gallons
February 1, 2013	Kathryn Ave, SE	100 gallons
February 1, 2013	Zimmerman Ave, SE	100 gallons
February 3, 2013	Indian School Rd & Rita Drive, NE	Unknown
February 4, 2013	Zuni & Palomas, SE	50 gallons
February 4, 2013	Juan Tabo & Lomas Blvd, NE	500 gallons
February 6, 2013	Carlisle, NE	100 gallons
February 11, 2013	Indian School & Broadway, NE	100 gallons
February 16, 2013	Montano, NW	50 gallons
February 22, 2013	Overflow at plant	1,000 gallons
February 22, 2013	Skyline, NE	500 gallons
March 2, 2013	Caynon View, NE	500 gallons
March 4, 2013	Copper & Camino del Norte, NE	500 gallons
March 6, 2013	Ponderosa Avenue, NE	100 gallons
March 9, 2013	Del Monte Trail, SW	50 gallons
March 12, 2013	Morris Street & Montgomery, NE	1,000 gallons
March 14, 2013	Pan American Frontage Rd.	500 gallons
March 19, 2013	Central Avenue, SE	Unknown
March 23, 2013	Edith, NE	50 gallons
April 11, 2013	Acoma Rd. & Conchas St., SE	1,000 gallons
April 26, 2013	Ridgecrest, SE	50 gallons
April 17, 2013	Montgomery, NE	50 gallons
May 2, 2013	Pino Avenue, NE	Unknown
May 7, 2013	Monte Alto Place, NE	Unknown
May 15, 2013	America's Parkway	360 gallons
May 28, 2013	Spense	60 gallons
June 13, 2013	Lobo Place, NE	20 gallons
June 10, 2013	Stage Coach	410 gallons
June 5, 2013	Aztec	300 gallons
June 26, 2013	65th St.	255 gallons
July 12, 2013	Woodward	500 gallons
July 26, 2013	Eubank & Montgomery	3,000 gallons
July 19, 2013	Roma & Guaymas	200 gallons
August 2, 2013	Los Picaros Road	1,315 gallons

Attachment C
Unauthorized Discharges

Date	Location	Volume
August 19, 2013	Barstow & Holly Ave	200 gallons
August 23, 2013	Four Hills	680 gallons
August 23, 2013	Montgomery	1,500 gallons
August 5, 2013	Los Picaros Road	150 gallons
September 2, 2013	Don Luis	3,725 gallons
September 9, 2013	Easy	200 gallons
September 17, 2013	Montgomery	7,500 gallons
September 25, 2013	ABCWUA (onsite)	5,000 gallons
September 26, 2013	Palm Springs	70 gallons
September 26, 2013	Juan Tabo & Candelaria	260 gallons
October 6, 2013	Summit Ave	1,275 gallons
October 17, 2013	Delicado	50 gallons
October 15, 2013	Padeo del Norte & Channel	50 gallons
October 21, 2013	2nd Street	40 gallons
October 28, 2013	2nd Street	250 gallons
November 20, 2013	Tramway	150 gallons
November 21, 2013	Central	500 gallons
November 16, 2013	Graceland & Hoyle	100 gallons
November 9, 2013	Candlelight	13,100 gallons
November 23, 2013	Bellamah & Monte Largo	250 gallons
November 27, 2013	Blue Feather & Lyons	3,300 gallons
November 23, 2013	Menaul	2,500 gallons
December 1, 2013	Del Mastro	15 gallons
December 11, 2013	Central & Mullberry	100 gallons
December 16, 2013	La Corrida	2 gallons
December 14, 2013	La cueva	6,250 gallons
December 19, 2013	Luchetti Road	4,488 gallons
December 20, 2013	Gladden/Pennsylvania	500 gallons
January 8, 2014	Arno	550,000 gallons
January 9, 2014	Mountain View	625 gallons
January 9, 2014	Indian School Road	5,350 gallons
January 18, 2013	Edith, NE	1,330 gallons
January 15, 2013	Boradway	150,000 gallons
January 30, 2014	Carlisle, NE	3,975 gallons
February 19, 2014	Wyoming	100 gallons
March 4, 2014	Lomas & University	500 gallons
March 5, 2014	Iron & Elm	500 gallons
March 8, 2014	Iron	100 gallons
March 12, 2014	Cibola Village	125 gallons
March 25, 2014	Constitution & Stamford	50 gallons
April 11, 2014	Elizabethh & Menaul	220 gallons
April 10, 2014	Comamche	31,500 gallons
April 25, 2014	Golf Course	7,500 gallons

Attachment C
Unauthorized Discharges

Date	Location	Volume
April 25, 2014	Golf Course &McMahon	500 gallons
April 27, 2014	Georgr & University	85 gallons
April 30, 2014	Broadway	20 gallons
May 9, 2014	Harper	100 gallons
May 15, 2014	Sagewood	1,500 gallons
May 15, 2014	Juan Tabo & Lomas	325 gallons
May 14, 2014	Jefferson & Montgomery	735 gallons
June 8, 2014	Lyon	18,000 gallons
June 10, 2014	Lomas & Nakomis	500 gallons
June 19, 2014	Paradise & University	75 gallons

Appendix 5 Response to Administrative Order

For clarity, only the portions related to the Collection Section are attached.

Albuquerque Bernalillo County
Water Utility Authority

PO Box 568
Albuquerque, NM 87103-0568
505-768-2500
www.abcwua.org

September 3, 2014

Ms. Gladys Gooden-Jackson
Water Enforcement Branch (6EN-WC)
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Via USPS Priority Mail: Signature Confirmation Receipt

Subject: Administrative Order, Docket Number: CWA-06-2014-1817
Permit Number: NM0022250

Dear Ms. Gooden-Jackson:

The Albuquerque Bernalillo County Water Utility Authority (Water Authority) received the referenced Administrative Order (AO) on July 29, 2014. After noting that Attachment A was the Limitations and Monitoring Requirements of the National Pollutant Discharge Elimination System (NPDES) permit effective May 1, 2005 – September 30, 2012 and that Attachment C had been omitted from the transmittal, a phone call was made as directed in the Administrative Order by Water Authority representatives Barbara Gastian and Charles Leder to Mr. Robert Houston. A voice message was left for Mr. Houston to notify him that Attachment C had been omitted from the permit and request that he return the phone call for further discussion of the AO.

We received a written response from Mr. Houston via electronic communication dated July 31, 2014. Mr. Houston's correspondence acknowledged that Attachment C was not attached and that the AO would be re-issued with adjusted dates.

The amended AO was received on August 8, 2014 (Attachment C was included in the amended AO). However, Attachment A to the AO is the Limitations and Monitoring Requirements of the NPDES permit effective May 1, 2005- September 30, 2012. As you know, the Water Authority received a revised permit with the effective date of October 1, 2012 which we have attached for reference to our response.

RESPONSE TO ADMINISTRATIVE ORDER

SECTION 309(a) COMPLIANCE ORDER

Section 309(a)(3) Compliance Order of the AO orders the Water Authority to take the following action:

> "A. Within thirty (30) days of the effective date of this Order, Respondent shall take such steps as necessary to comply with the effluent limitations provision of the permit cited herein."

Attachment B – Effluent Violations is a list of effluent violations occurring from October 31, 2012 through May 31, 2014.

Information provided to respond to the violations is provided below.

1. The first six (6) noted violations were reported as required within 24 hours, to be followed by a five (5) day report. As stated, corrective action was taken after each violation. The violations were not recurrent.

2. The balance of the violations list parameter Biochemical Oxygen Demand, 5-Day, 30-Day Avg. Each violation noted the loading rates in pounds per day (lbs/day) with respect to the permit limit of 709 lbs/day. A total of 19 violations are noted, one (1) in each month from October 2012 through May 2014.

3. On May 30, 2013, NMED/SWQB representatives conducted a Compliance Evaluation Inspection (CEI) at the SWRP. During the course of the CEI, Water Authority representatives first noted that although the 30-DAY AVG (mg/L) and 7-DAY AVG (mg/L) as reported in each Discharge Monitoring Report (DMR) submitted from October 2012 to April 2013 routinely met the permit discharge limits, the permit discharge listing for Carbonaceous Biochemical Oxygen Demand, 30-DAY AVG loading limit was exceeded in each month. It appeared the incorrect loading limit was based on a calculation error in the permit. In the June 10, 2013 CEI Report, NMED/SWQB acknowledged the error on page 10:

> "Further Explanations, Section A – Permit Verification – Overall Rating of "Satisfactory", Findings for Permit Verification:
>
> The permit was issued October 1, 2012. Review of the final effluent limits have a carbonaceous Biochemical Oxygen Demand, 5-day, 30 day average loading limit of 709 lbs/day. Their 30-day average is 15 mg/L.
>
> The calculation used for loading is as follows:
>
> Concentration (15 mg/L) * design flow (76 MGD) * 8.34
>
> 15 mg/L * 76 MGD * 8.34 = 9507 lbs/d
>
> This error was found during this inspection and therefore review of their DMRs show that the 30-day average loading is above the permit limit of 709 lbs/d. EPA may consider modification of the permit to address this issue."

A copy of the report is attached for reference.

4. On June 10, 2013, EPA Administrative Order, Docket Number: CWA-06-2013-1807 was received.

5. In response to AO CWA-06-2013-1807, EPA was informed in a letter dated July 2, 2013 (attached) of the following:

> "Carbonaceous Biochemical Oxygen Demand, 5-Day
> Violations of the permit discharge limitation for Carbonaceous Biochemical Oxygen Demand, 5-Day (CBOD) 30-DAY AVG in lbs/day discharge limit are listed for the months of October, November, and December of 2012 and January of 2013, with values of 1,261, 1,235, 1,230, and 1,277 lbs/day, respectively. The permit specifies a 30-DAY AVG discharge limitation of 709 lbs/day.

Consistent with the method for calculating the other 30-Day average loading limitations contained in the permit, the CBOD loading limitation is based on the concentration (15 milligrams per liter (mg/L)) and is calculated as follows:

15 mg/L * 76 MGD * 8.34 = 9,508 lbs/day

The 30-DAY AVG concentration levels reported in monthly DMRs since October 2012 have been no greater than 3 mg/L or 20% of the permitted level. The reported 30-DAY AVG loading levels have ranged between 1,107 and 1,557 lbs/day or 12-16% of the recalculated loading limitation.

Based on what appears to be a calculation error, the Water Authority requests a revision to the permit limitation for CBOD."

6. The Water Authority subsequently reviewed the permit and EPA responses to comments submitted on the draft permit. During the review additional potential typographical errors, along with some necessary minor wording changes were identified. The permit cover letter directs the Water Authority to contact Laurence Giglio of the NPDES Permits Branch should there be any questions regarding the final permit. During a conversation with Mr. Giglio on July 31, 2013 to discuss the request to modify the permit condition, he directed that the request for revisions be addressed to Mr. Larsen and Ms. Johnsey.

7. On August 8, 2013, the Water Authority submitted the attached document: **Basis for the Request to Revise Permit Conditions for Albuquerque Bernalillo County Water Utility Authority Southside Water Reclamation Plant NPDES Permit (NM0022250), Effective Date October 1, 2012** to Mr. Larsen and Ms. Johnsey. The letter included a request to modify the CBOD, carbonaceous 05 (cBOD5) – loading limitation from 709 lbs/day to 9508 lbs/day.

8. The cover letters submitted for all DMRs for May 2013 to the present reference the error in the CBOD loading. The May 2013 DMR submittal is attached to illustrate.

Attachment C - Unauthorized Discharges is list of overflows from the sanitary sewer or on the SWRP Plant site that occurred from January 1, 2011 to June 19, 2014.

The Water Authority reviewed the 182 Unauthorized Discharges listed in Attachment C (178 for sanitary sewer overflows and four (4) for SWRP plant site overflows or spills).

The listing matches Water Authority records with the following exceptions:

1. The "Volume" column does not recognize that prior to May 1, 2013 the Water Authority reported an estimated range for the volume discharged, e.g. "51-100 gallons". Typically, Attachment C reports the highest volume in the specified range.

2. The following overflows were not included:

Date	Location	Volume
May 7, 2013	4201 2nd St SW	50 gallons
May 7, 2013	4201 2nd St SW	200 gallons
June 10, 2013	4201 2nd St SW	3000 gallons
November 16, 2013	4201 2nd St SW	3000 gallons
November 19, 2013	Claremont & Palomas NE	73 gallons

Notification Reports for the above events, SWRP Overflow DMRs for May 2013, June 2013 and November 2013 and the SSO DMR for November 2013 are attached.

3. The list included six (6) events with "Unknown" volumes. Volumes were included in the reports. The corrections are noted in the table below.

4. The list included three (3) events where the original discharge volumes had been updated in the 5-day Reports and monthly DMRs previously submitted to EPA. The updated volumes are noted in the table below.

Date	Location	Volume
November 12, 2012	Kathryn Ave., SE	~~Unknown~~ 50 gallons
November 16, 2012	Willow Ct., SE	~~Unknown~~ 1000 gallons
February 3, 2013	Indian School Rd. & Rita Drive, NE	~~Unknown~~ 100 gallons
March 19, 2013	Central Ave., SE	~~Unknown~~ 500 gallons
May 2, 2013	Pino Ave., NE	~~Unknown~~ 8000 gallons
May 7, 2013	Monte alto Place, NE	~~Unknown~~ 3750 gallons
September 25, 2013	ABCWUA (onsite)	~~5,000~~ 6170 gallons offsite, 3.8 MG onsite
January 8, 2014	Arno	~~550,000~~ 5450 gallons
January 15, 2014	Broadway	~~150,000~~ 5574 gallons

The SSO DMRs for November 2012, February 2013, March 2013, May 2013 and January 2014 and SWRP Overflow DMR for September 2013 showing the updated volumes are attached.

SECTION 308 INFORMATION DEMAND

Section 308 Information Demand of the AO orders the Water Authority to take the following actions:

> "A.Within thirty (30) days of the effective date of this Order, Respondent must certify compliance with the terms and conditions of the permit.
> B. Within thirty (30) days of the effective date of this Order, Respondent shall provide• written certification to EPA, Region 6 that the violations cited herein have been corrected and the facility is in compliance with the requirements of the permit.
> C. In the event that Respondent believes complete correction of the violations cited herein is not possible within thirty (30) days of the effective date of this Order, Respondent shall, within thirty (30) days of the effective date of this Order, submit a comprehensive written plan for the elimination of the cited violations within the shortest possible time. Such plan shall describe in detail the specific corrective actions to be taken and why such actions are sufficient to correct the violations. The plan shall include a detailed schedule for the elimination of the violations within the shortest possible time, as well as measures to prevent these or similar violations from recurring."

Certification of Compliance.
As stated previously, the Water Authority certifies compliance with the terms and conditions of the permit except for the 30-day AVG loading limit for CBOD. Compliance with the CBOD loading limitation is not possible until the permit limitation is modified. A formal request to modify the permit was submitted to EPA Region 6 on August 8, 2013. All other violations have been corrected.

Regarding corrective actions at the SWRP, on May 19, 2014, the Water Authority submitted the attached Revised Corrective Action Plan to Mr. Houston. This document updated the status of the improvements listed in the April 2012 Corrective Action Plan. In addition to those actions, in response to the overflow at the SWRP in September 2013, the following actions were taken or are planned to be completed:

1. Retained Eaton Corporation to conduct a field service report for existing Field Isolation Switchgear (FIS) (2013).
2. Worked with the local electric utility to have a second substation feed available to the plant (2013).
3. Installed new Field Isolation Switchgear (completed summer 2014). The existing FIS will be kept in service as a redundant system.
4. Retained AECOM Technology Corporation in 2014 to conduct an evaluation of the plant electrical system and develop recommendations for improvements.

Regarding unauthorized discharges from the sanitary sewer system, the Water Authority acknowledges that all discharges from the sanitary sewer system are prohibited. The Water Authority accepts the goal of reaching zero sanitary sewer overflows (SSOs) and actively manages to eliminate or minimize such discharges by implementation of the Capacity, Management, Operations and Maintenance (CMOM) Plan (2013), Water Authority Sewer Use and Wastewater Control Ordinance (SUO) (2014) and Fats, Oils and Grease (FOG) Policy (2014). The CMOM Plan, the draft SUO revision and a previous version of the FOG policy were prepared as required by the NPDES permit and submitted to EPA on September 27, 2013. The Water Authority Board adopted revisions to the SUO on January 29, 2014 which became effective on July 1, 2014. The FOG Policy was updated in May 2014. The SUO and the updated FOG policy were submitted to EPA on June 2, 2014 as part of the Pretreatment Program Modification Request. The CMOM Plan, SUO and FOG Policy are attached. Specific activities include:

1. CMOM. The CMOM Plan is a comprehensive plan for preventing SSOs with procedures for overflow emergency response, volume spilled and recovered, force main inspection, sewer cleaning, and responding to odor complaints. The CMOM plan also addresses initiatives for improving processes such as closed-circuit televising of sewer lines and the use of root foaming and FOG buster techniques.

2. SUO. The January 29, 2014 Ordinance contains expanded FOG requirements. The Water Authority Pretreatment Program is actively enforcing the newly effective SUO. Notices of Violation (NOVs) have been given to all known (250) Food Service Establishments (FSEs) without Grease Removal Systems (GRSs) and 11 FSEs for non-functional GRSs. The Pretreatment Program will focus enforcement on non-functional and overfilled GRSs in FY15.

3. FOG Policy. The FOG Policy was updated in May 2014. The Pretreatment Program reduces impacts from FOG on the sewer system through outreach/public relations, inspections, and enforcement. A total of 3,606 FSE inspections have been performed between January 1, 2011 and June 30, 2014.

The Water Authority has requested a meeting with EPA to discuss the ongoing improvements we are making to resolve these issues along with answering any questions related to the allegations in this AO.

Please contact me at (505) 768-3631 or jstomp@abcwua.org if you have any questions or need additional information.

Sincerely,

John M. Stomp, III, P.E.
Chief Operating Officer

cc: John Blevins, EPA Region 6, Compliance Assurance and Enforcement Division

Mr. Bruce Yurdin
Acting Bureau Chief
Surface Water Quality Bureau
New Mexico Environment Department
P.O. Box 5469
Santa Fe, NM 87502-5469

Attachments: NPDES permit (NM0022250) effective October 1, 2012
June 10, 2013 NMED Compliance Evaluation Inspection Report for NM0022250
July 2, 2013 Response to AO Letter
August 8, 2013 Permit Modification Request for NM0022250
May 2013 Discharge Monitoring Report for NM0022250
SWRP Overflow 5-Day Reports for May 7, 2013, June 10, 2013 and November 16, 2013 events.
SSO Notification Report for Claremont & Palomas NE on November 19, 2013.
SSO DMRs for November 2012, February 2013, March 2013, May 2013 and November 2013, January 2014.
SWRP Overflow DMRs from May 2013, June 2013, September 2013 and November 2013
May 2014 Revised Corrective Action Plan for SWRP
2013 ABCWUA CMOM Plan
2014 ABCWUA SUO
2014 ABCWUA FOG Policy

Appendix 6 Sanitary Sewer Compliance Inspection Report

SANITARY SEWER COMPLIANCE INSPECTION

INSPECTION REPORT

Albuquerque Bernalillo County Water Utility Authority

REPORT DATE: January 28, 2013
INSPECTION CONDUCTED: September 25 - 26, 2012

Office of Enforcement and Compliance Assurance
Water Enforcement Division
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

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EXECUTIVE SUMMARY

Sanitary Sewer Compliance Inspection
Albuquerque Bernalillo County Water Utility Authority

On September 25 and 26, 2012, the U.S. Environmental Protection Agency (EPA), with assistance from PG Environmental, LLC (PG), a U.S. EPA contractor (hereinafter, collectively EPA Inspection Team), inspected the Albuquerque Bernalillo County Water Utility Authority (Authority) sanitary sewer system. The purpose of the inspection was to evaluate the Authority's compliance as it relates to the operation and maintenance (O&M) of the Authority's wastewater collection and conveyance system, as well as sanitary sewer overflow (SSO) response and reporting procedures. This report summarizes the results of the inspection. A detailed listing of field activities is included in Appendix A.

The EPA Inspection Team identified several areas of potential non-compliance regarding the Authority's compliance with its NPDES permit. Each identified potential non-compliance is correlated with the associated permit requirement, as summarized below in Table ES1. This summary table of findings provides a brief compliance status overview of each item of potential non-compliance; however, the supporting information to substantiate these claims is contained in the appropriate sections of the body of the report.

Table ES1. NPDES Wastewater Discharge Permit NM0022250 Sanitary Sewer Compliance Inspection Summary for Albuquerque Bernalillo County Water Utility Authority

Permit Requirement	Compliance Status
Finding 1. Part III., SECTION B. Provision 2. DUTY TO MITIGATE and Provision 4.c PROHIBITION OF BYPASS and State of New Mexico Administrative Code 20.6.2.2201 – DISPOSAL OF REFUSE 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. Also, 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. Further, the New Mexico Administrative Code (NMAC) 20.6.2.2201 states: No person shall dispose of any refuse in a natural watercourse or in a location and manner where there is a reasonable probability that the refuse will be moved into a natural watercourse by leaching or	The Authority is prohibited from bypassing any portion of the treatment facilities. Based on reported overflows from the sanitary sewer system, the Authority bypassed the treatment facilities on 101 occasions during the period of January 15, 2010 to August 1, 2012 It should be noted that the Authority was found not to be reporting SSOs with volumes estimated to be 50 gallons or less.

Table ES1. NPDES Wastewater Discharge Permit NM0022250 Sanitary Sewer Compliance Inspection Summary for Albuquerque Bernalillo County Water Utility Authority

Permit Requirement	Compliance Status
otherwise. Solids diverted from the stream and returned thereto are not subject to abatement under this Section.	
Finding 2. PART I., SECTION C. MONITORING AND REPORTING, Provision 6. The permittee shall report all overflows with the Discharge Monitoring Report submittal. These reports shall be summarized and reported in tabular format. The summaries shall include: the date, time, duration, location, estimated volume, and cause of the overflow; observed environmental impacts from the overflow; actions taken to address the overflow; and ultimate discharge location if not contained (e.g., storm sewer system, ditch, tributary). Overflows which endanger health or the environment shall be orally reported to EPA at (214) 665-6595 and NMED Surface Water Quality Bureau at (505) 827-0187, within 24 hours from the time the permittee becomes aware of the circumstance. A written report of overflows which endanger health or the environment shall be provided to EPA and the NMED Surface Water Quality Bureau within 5 days of the time the permittee becomes aware of the circumstance.	The NPDES permit requires the permittee to submit various levels of reports in the event that an SSO occurs in the collection system. The Authority was found to be deficient in several aspects of this reporting, including: a) The Authority determined it was not required to report SSOs of 50 gallons or less and therefore did not report 637 SSOs of 50 gallons or less for the period of January 1, 2008 to September 25, 2012. b) The Authority failed to accurately estimate and report SSO volumes. Ranges were used to estimate SSO volume and the top range included all SSOs greater than 1,000 gallons. c) The Authority failed to record the volume of at least one SSO. d) The Authority failed to orally report SSOs to EPA and NMED Surface Water Quality Bureau within 24 hours. e) The Authority failed to identify the tributary or waterway which was the ultimate discharge location.
Finding 3. PART I., SECTION C. MONITORING AND REPORTING, Provision 7. Any noncompliance which may endanger health or the environment shall also be orally reported to the Pueblo of Isleta at (505) 869-5748 and to the U. S. Fish and Wildlife Service, Albuquerque Field office at (505) 761-4525, as soon as possible, but within 12 hours from the time the permittee becomes aware of the circumstance. A written report of overflows which endanger health or the environment, shall be provided within 5 days of the time the permittee becomes aware of the circumstance.	The Authority is required to report SSOs in accordance with its NPDES permit. The Authority failed to contact the Pueblo of Isleta or U.S. Fish and Wildlife Service concerning NPDES noncompliance (e.g., SSOs) which may endanger health or the environment for the period of January 1, 2008 to September 25, 2012.
Finding 4. Part III., SECTION B. Provision 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.	The Authority is required to minimize any discharge that will adversely affect the environment. Authority staff indicated that the first priority when responding to an SSO is to break or remove the blockage in the sewer and restore normal flow to the system. They further stated that capturing wastewater spillage after it enters a storm drain is not a common practice, creating a reasonable likelihood of adversely affecting the environment downstream.

Table ES1. NPDES Wastewater Discharge Permit NM0022250 Sanitary Sewer Compliance Inspection Summary for Albuquerque Bernalillo County Water Utility Authority

Permit Requirement	Compliance Status
Finding 5. PART III. STANDARD CONDITIONS FOR NPDES PERMITS, SECTION B. PROPER OPERATION AND MAINTENANCE, Provision 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.	The Authority is required to conduct operations and maintenance activities of all treatment facilities. As defined in the permit, the collection system is part of the treatment facilities. The Authority failed to properly operate and maintain the collection system in order to minimize prohibited discharges from the collection system. The Authority failed to maintain and update written standard operating procedures (SOPs) for routine maintenance and failed to conduct a force main evaluation and inspection program as necessitated by historical force main failures in the system.

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TABLE OF CONTENTS

LIST OF APPENDICES

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I. INTRODUCTION

On September 25 and 26, 2012, the U.S. Environmental Protection Agency (EPA), with assistance from PG Environmental, LLC (PG), a U.S. EPA contractor, inspected the Albuquerque Bernalillo County Water Utility Authority (Authority) sanitary sewer system. The EPA Inspection Team evaluated the Authority's compliance as it relates to the operation and maintenance (O&M) of the Authority's wastewater collection and conveyance system, as well as sanitary sewer overflow (SSO) emergency response and reporting procedures. The sewer collection and conveyance system is completely separate from the City of Albuquerque (City) storm water system. The EPA Inspection Team evaluated compliance with the Authority's National Pollutant Discharge Elimination System (NPDES) Wastewater Discharge Permit No. NM0022250 (Permit)[1].

The purpose of the inspection was to assess the Authority's operational management and controls of its sewage collection and conveyance system, the effectiveness of its SSO emergency response procedures, and the accuracy and reliability of its reporting program. This report summarizes the results of the inspection. A detailed listing of field activities is included in Appendix A. The following are the primary personnel involved in the inspection of the Authority's sewer collection and conveyance system:

Authority Representatives:	Mark Holstad, Collection Section Manager Mark Gallegos, Collection Section Superintendent Patrick Griego, Collection Section Superintendent Angelo R. Baca, Assistant Superintendent, Planner/Scheduler
New Mexico Environmental Department (NMED) Representatives:	Sarah Holcomb, Daniel Valenta, Barbara Cooney
EPA Inspection Team:	James Zimny, U.S. Environmental Protection Agency, HQ Robert Houston, U.S. Environmental Protection Agency, Region 6 Hannah Branning, U.S. Environmental Protection Agency, Region 6 Joshua Waldmeier, U.S. Environmental Protection Agency, Region 6 Craig Blett, PG Environmental, LLC Jake Albright, PG Environmental, LLC

A complete list of inspection attendees is included on the sign-in sheet in Appendix B.

The compliance inspection consisted of the following major activities:

- Discussions with representatives from the Authority regarding the operation and maintenance of the wastewater collection and conveyance system, reporting procedures, and capital improvement program.
- Observation of maintenance crew activities.
- Examination of the Authority's records for wastewater collection and conveyance system procedures, maintenance, and reporting records.

Section II of this report presents background information on the Authority's sewer collection and conveyance system and sewage treatment plant. Section III presents the inspection team's findings with

[1] A new permit was to become effective October 1, 2012. The requirements of that permit were not reviewed during the inspection.

respect to the permit requirements, Section IV presents areas of concern in the Authority's program, and Section V presents additional pertinent observations.

II. TREATMENT AND COLLECTION SYSTEM DESCRIPTION

A. Southside Water Reclamation Plant

The Southside Water Reclamation Plant (WRP) was not a focus of the inspection. A summary of the WRP is provided for general reference. The WRP provides preliminary screening; grit removal; primary clarification and sludge removal; advanced secondary treatment including ammonia and nitrogen removal; final clarification; and effluent chlorination and dechlorination prior to discharge to the Rio Grande. The WRP is located at 4201 2nd Street Southwest, and has a designed flow of approximately 76 million gallons per day (mgd), with an average daily flow of approximately 55 mgd.

The Permit authorizes the Authority to discharge wastewater effluent from the WRP to the Rio Grande in Segment 20.6.4.105 of the Rio Grande Basin from a single outfall, designated Outfall 001. Outfall 001 is located at Latitude 35°01'04" N and Longitude 106°40'13" W.

B. Collection System

The Authority was created in June 2003 as a sub-division of the State of New Mexico to improve the communication and cooperation between the City and Bernalillo County in the operation of their respective collection systems. The Authority provides wastewater collection, conveyance, and treatment for the City of Albuquerque as well as surrounding unincorporated areas of Bernalillo County, servicing approximately 303 square miles and 600,000 residents. The Authority's wastewater collection and conveyance system is comprised of approximately 2,400 miles of sanitary sewers. The majority of the sanitary sewer is gravity lines; however, there are 35 lift stations and 10 vacuum stations that service low lying areas. The collection system's sewer discharges to four main interceptors (referred to as the Westside Interceptor, Tijeras Interceptor, Edith Interceptor and the Valley Interceptor) which convey wastewater to the WRP.

According to the Collection Section Manager, the collection system is adequately sized to convey peak daily flows and has not experienced capacity related backups or bypasses.

C. Operations and Maintenance

There are a total of 64 persons dedicated to operating and maintaining the collection system. The personnel comprise 11 crews and management for O&M activities for the sewer collection and conveyance system. The crews are directed by a supervisor who reports to one of the two Collection Section Superintendents or to the Assistant Collection Section Superintendent.

Records for the collection system were available for review during the inspection. The Authority has been using a developed-in-house computer tracking database for O&M activity, designated "Sewer App," since the mid-1990s. The Authority is in the process of converting all collection system O&M tracking to the Maximo computer maintenance management system (CMMS).The conversion to Maximo began in approximately April 2009 with the addition to the CMMS of gravity lines. Pump stations were integrated in Maximo beginning in early 2012 along with a sub-basin cleaning plan in approximately June 2012. The Collection Section Manager stated that the Authority's goal is to be fully integrated using Maximo by the end of 2012.

Collection system crews receive work orders generated from Maximo or Sewer App. These work orders are then used by crews to conduct preventive maintenance and repairs. Among the activities that are

regularly scheduled are sewer cleaning and routine preventive maintenance, short interval cleaning (e.g., hot-spot cleaning), and closed circuit television inspection (CCTV) of lines. The Collection Section Manager stated that the Authority is able to clean the entire collection system approximately every three to five years. It should be noted that the Authority submitted the *Revised Corrective Action Plan* (not reviewed as part of the inspection) to EPA Region 6 in response to Administrative Order (AO) CWA-06-2011-177 on April 12, 2012. This plan includes provisions for the implementation of a capacity, management, operations, and maintenance (CMOM) program as well as a construction schedule and description for priority sewer projects. Refer to Appendix C for a copy of the *Revised Corrective Action Plan*.

D. Sewer Cleaning Program

The Authority has divided the sanitary sewer system into 44 separate sub-basins to aid in scheduling and tracking cleaning activities. As stated previously, the Authority has 11 crews available for sanitary sewer O&M. Four crews work a shift Monday through Thursday, and four different crews work a Tuesday through Friday. Crews are typically divided evenly between the east and west sides of the City for routine cleaning. The remaining three crews are used on swing shifts and focus mainly on short interval cleaning (e.g., hot-spots).

According to the Collection Section Superintendents, Authority crews use a step cleaning strategy when performing routine and short interval cleaning. This means that crews will jet and vacuum a short section of sewer line, typically 50 feet, then a longer segment of the same line, increasing the segment length in approximately 50-foot increments until they reach the next manhole.

Short interval cleaning is conducted on a once-per-month to once-per-year frequency, based upon the needs of the particular sewer segment. Short interval recommendations are made by collections personnel based on maintenance history including SSO activity in the sewer segment, CCTV observations, and observations made during routine cleaning. According to the Collection Section Superintendents, these recommendations are then reviewed for implementation by the Authority's SSO Reduction Committee.

III. ASSESSMENT OF COMPLIANCE WITH PERMIT REQUIREMENTS

The EPA Inspection Team evaluated the Authority's compliance with the Permit. The Permit has an effective date of May 1, 2005 and an expiration date of April 30, 2010. The Permit has been administratively extended. The EPA Inspection Team identified several instances of potential noncompliance regarding the Authority's Permit, which are reported as findings below and correlated to a Permit requirement.

A. Finding 1. Part III., SECTION B. Provision 2. DUTY TO MITIGATE and Provision 4.c PROHIBITION OF BYPASS and NMAC 20.6.2.2201 – DISPOSAL OF REFUSE

The Permit states, "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." The Permit also states the following:

> 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.

Further, NMAC 20.6.2.2201 states, "No person shall dispose of any refuse in a natural watercourse or in a location and manner where there is a reasonable probability that the refuse will be moved into a natural watercourse by leaching or otherwise. Solids diverted from the stream and returned thereto are not subject to abatement under this Section."

The EPA Inspection Team reviewed prohibited discharges reported to EPA by the Authority and found that 101 prohibited discharges (i.e., SSOs) had been reported to EPA during the period of January 15, 2010 to August 1, 2012. Refer to Appendix D for the list of these reported SSOs. It should be noted that the Authority was found not to be reporting SSOs with volumes estimated to be 50 gallons or less. Refer to "Finding 2" immediately below for details concerning this practice.

B. Finding 2. PART I., SECTION C. MONITORING AND REPORTING, Provision 6.

The Permit states the following:

> The permittee shall report all overflows with the Discharge Monitoring Report submittal. These reports shall be summarized and reported in tabular format. The summaries shall include: the date, time, duration, location, estimated volume, and cause of the overflow; observed environmental impacts from the overflow; actions taken to address the overflow; and ultimate discharge location if not contained (e.g., storm sewer system, ditch, tributary). Overflows which endanger health or the environment shall be orally reported to EPA at (214) 665-6595 and NMED Surface Water Quality Bureau at (505) 827-0187, within 24 hours from the time the permittee becomes aware of the circumstance. A written report of overflows which endanger health or the environment shall be provided to EPA and the NMED Surface Water Quality Bureau within 5 days of the time the permittee becomes aware of the circumstance.

The Authority was found to be deficient in the following as it relates to the overflow reporting requirements of the Permit:

a) The Authority determined it did not need to report SSOs less than or equal to 50 gallons.
b) The Authority failed to report SSOs over 50 gallons.
c) The Authority failed to accurately estimate and report SSO volumes.
d) The Authority failed to record the volume of at least one SSO.
e) The Authority failed to report the ultimate discharge location of an SSO.
f) The Authority failed to orally report SSOs to EPA and NMED Surface Water Quality Bureau within 24 hours of becoming aware of the overflow.

Potential non-compliance is described in more detail below.

a) According to the Collection Section Manager, the Authority does not typically report SSOs which are estimated to have a volume less than or equal to 50 gallons. The EPA Inspection Team determined through document review that the Authority had potentially recorded 637 SSOs with volumes estimated to be between 1 and 50 gallons between January 1, 2008 and September 25, 2012; however, none were apparently reported to EPA as required. The number of unreported SSOs with volumes less than or equal to 50 gallons was based on a count of reports in files containing the unreported SSOs and a work order log generated by the CMMS and provided to EPA during the inspection. A small subset of these SSO reports was reviewed; however, most of the reports in the files were not

reviewed due to time constraints during the inspection. Two examples of unreported SSO less than or equal to 50 gallons are included in Appendix E. Also, a list of service requests (SRs) generated by the CMMS for SSOs of less than or equal to 50 gallons occurring between January 1, 2012 and September 25, 2012 can be found in Appendix F.

The Collection Section Manager explained that the determination to not report such SSOs was made based on information that he gathered through attending various workshops and researching practices of other agencies. The Collection Section Manager stated that he recently contacted EPA for clarification on reporting protocol and was told to report all SSOs regardless of volume. He indicated that the Authority would begin the practice of reporting all SSOs on October 1, 2012.

b) As stated above, the Authority's standard practice was to only report SSOs with volumes exceeding 50 gallons; however, the EPA Inspection Team found that the Authority failed to report SSOs exceeding 50 gallons in volume on multiple occasions. This finding was based on a review of a small subset of SSOs in files containing SSO reports for spills less than 50 gallons and on a review of SSO reports for spills that were in files of "reported" SSOs.

Specifically, through document review of a small subset of the Authority's *Field Division/Collection Section Condition Report* forms filed between January 1, 2008 and September 25, 2012, the EPA Inspection Team found that at least two SSOs estimated to be between 51 and 100 gallons were not reported to EPA as required by the Permit. The first such SSO occurred on December 14, 2009 at 8010 Academy Road NE, and the second occurred on January 24, 2010 at 3821 Commercial Street NE. Refer to Appendix E for copies of the *Field Division/Collection Section Condition Report* forms recorded by the Authority for the aforementioned SSOs.

c) Authority staff stated that they do not make specific volume estimates when reporting SSOs; instead, they categorize volumes into ranges. The Authority uses the following ranges when reporting SSOs: 0-50 gallons; 51-100 gallons; 101-500 gallons; 501-1,000 gallons; and over 1,000 gallons. Authority staff indicated that several spills have occurred that significantly exceed 1,000 gallons; however, an accurate estimation of the volume was not recorded. Further, it was stated by Authority staff that operators do not receive training on estimating volumes of SSOs and that there is no written SOP or defined procedure for estimating volumes. Based on the information reported by the Authority, the EPA Inspection Team was unable to accurately estimate the true volume of SSOs that had occurred in the system. Refer to Appendix E for examples of the *Field Division/Collection Section Condition Report* form used to report SSOs.

d) The Authority failed to include a reported volume of SSO discharged from the collection system for at least one SSO event report reviewed during the inspection. Specifically, a *Field Division/Collection Section Condition Report* was filed for an SSO occurring on December 15, 2009 at the intersection of Solano Drive SE and Pershing Avenue SE. The volume of the spill was not recorded. It should also be noted that this event did not appear to be reported to EPA. Refer to Appendix E for a copy of the *Field Division/Collection Section Condition Report*.

e) The Authority routinely failed to report the ultimate location of an SSO. The *Field Division/Collection Section Condition Report* form does have a check box to indicate the location the wastewater was spilled but does not indicate the ultimate location of the wastewater or whether any of the spilled wastewater was captured for treatment. Without knowing whether the spill was captured or lost to a storm sewer or drainageway, the EPA Inspection Team could not determine the ultimate location of the spill.

f) The EPA Inspection Team found through review of a small subset of the Authority's *Field Division/Collection Section Condition Report* forms from January 1, 2008 to September 19, 2012 that

on numerous occasions the Authority failed to orally report SSOs to EPA and the NMED Surface Water Quality Bureau within 24 hours of becoming aware of them. Two specific examples of this deficiency were noted for overflows occurring on February 17 and 19, 2012. In the case of the February 17, 2012 event, EPA and the NMED Surface Water Quality Bureau were notified four days after the Authority became aware of the overflow, and in the case of the February 19, 2012 event, oral notification was given two days after the Authority became aware of the overflow. The *Field Division/Collection Section Condition Report* forms for these two events can be found in Appendix E. It should also be noted that the EPA Inspection Team observed numerous forms on which the date and time of oral notification was not recorded. Refer to Appendix E for two such examples.

C. Finding 3. PART I., SECTION C. MONITORING AND REPORTING, Provision 7.

The Permit states the following:

> Any noncompliance which may endanger health or the environment shall also be orally reported to the Pueblo of Isleta at (505) 869-5748 and to the U. S. Fish and Wildlife Service, Albuquerque Field office at (505) 761-4525, as soon as possible, but within 12 hours from the time the permittee becomes aware of the circumstance. A written report of overflows which endanger health or the environment shall be provided within 5 days of the time the permittee becomes aware of the circumstance.

Authority staff stated that it is not standard practice to report the occurrence of SSOs to the Pueblo of Isleta or to the U. S. Fish and Wildlife Service. No evidence was presented that demonstrated this requirement had been met. The Collection System Manager stated that he recently asked EPA for clarification on the Permit requirement and was told that all SSOs are considered to endanger health and/or the environment and should be reported to the Pueblo of Isleta and to the U. S. Fish and Wildlife Service.

D. Finding 4. PART III., SECTION B. PROPER OPERATIONS AND MAINTENANCE, Provision 2. DUTY TO MITIGATE

The permit states, "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."

Authority staff indicated that when responding to an SSO, their first priority is to break or remove the blockage in the sewer and restore normal flow to the system. They further stated that attempting to capture wastewater once it had entered storm drains was not standard procedure. Failure to attempt to capture spilled wastewater creates a reasonable likelihood of adversely affecting human health or the environment. It should be noted that the storm sewer system located within the Authority's service area is owned and operated by the City. Authority staff indicated that the City is typically notified when an SSO enters a storm drain; however, no record of this notification was available for review. Authority staff further stated that the storm sewer system discharges to retention and detention basins in some locations as well as surface waters; however, Authority staff were uncertain which storm drains went to basins and which went to surface waters.

E. Finding 5. PART III., SECTION B. PROPER OPERATION AND MAINTENANCE, Provision 3. PROPER OPERATION AND MAINTENANCE a.

The Permit states the following:

> 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.

The Authority failed to properly operate and maintain the collection system in order to minimize prohibited discharges from the collection system. Examples of improper operation and maintenance include failure to maintain and update written SOPs for routine maintenance and failure to conduct a force main evaluation and inspection program. For example, one force main had multiple ruptures and spills before system operations were modified (i.e., pump pressure was reduced). Further evidence of improper operation and maintenance is the existence of a large number of SSOs (both reported and unreported) caused by the accumulation of grease, roots, and debris.

According to the Collection Section Manager, the Authority does not currently maintain an O&M manual or SOPs for routine and preventive maintenance of the sanitary sewer system. Field crews conducting cleaning and maintenance activities rely primarily on on-the-job training. The Collection Section Manager further stated that the Authority is pursuing implementation of a CMOM program for the first time. Refer to Appendix C for the *Revised Corrective Action Plan*, which describes implementation of the CMOM program.

IV. AREAS OF CONCERN

In addition to potential noncompliance with the Permit, the EPA Inspection Team also noted several areas of concern (AOC) with the Authority's sanitary sewer operations, maintenance, and management and SSO emergency response procedures. These AOCs are detailed below. Note that relative importance or significance of the AOCs is not represented by the order presented in the report.

A. AOC 1. The Authority appeared to have inaccurately estimated its unique pipe cleaning cycle.

The Authority stated that it conducts a system-wide cleaning of its entire gravity sewer system on a three to five year cycle. The EPA Inspection Team was able to review some recent monthly cleaning production reports. Based on a projection of those monthly cleaning production data, the cleaning cycle appeared to be closer to eight or nine years. The total monthly cleaning for the months of November 2011 through August 2012 was approximately 224 miles for preventive maintenance. That equates to a monthly average of 22.4 miles per month. Based on a system length of approximately 2,400[2] miles, it would take approximately nine years to clean the entire system. An additional 15 miles of short interval cleaning is conducted on average each month. The short interval cleaning was not included in the calculation because the same segments are cleaned repeatedly and are not representative of mileage towards a comprehensive system cleaning cycle. The EPA inspection team believes that short interval cleaning is vital to SSO prevention and should continue. The primary concern is the need to establish performance measures and to track those measures (e.g., cleaning cycles and effectiveness of short term interval cleaning) so that management decisions can be made on the allocation of resources to conduct operations.

[2] The total length of collection system pipe was taken from the Asset Management Plan. This length of pipe may include force mains and vacuum collection pipes which would not be subject to regular preventative cleaning.

B. AOC 2. The Authority does not maintain an inventory of spill containment equipment.

The Authority does not readily maintain spill containment equipment necessary to prevent overflows from entering storm drains. Authority staff stated that overflow containment equipment such as sandbags are not maintained in crew vehicles or at the central maintenance yard as part of the standard inventory for SSO response teams. Once on site, first responders work to restore normal flow to the system. When that is achieved, responders then work to clean and disinfect the affected overflow area. According to Authority staff, attempting to contain the overflow and minimize the affected area is not standard practice. There are no written procedures to address SSO spill containment.

C. AOC 3. Authority staff was unaware of proper SSO response procedures.

Proper training including periodic refresher training is critical for first responders to an SSO event. Authority representatives stated that all collections crews are trained through a tiered certification program with attainments of Levels I through III. A Level III operator was questioned in the field regarding SSO response procedures and he stated that he was not familiar with any particular response procedures. He stated that he typically bases his actions on instructions given by the responding supervisor. Additionally, according to Authority representatives, no training is conducted on SSO volume calculations.

D. AOC 4. The Authority has no formal written procedures for SSO emergency response and reporting protocols.

The EPA Inspection Team found that the Authority did not maintain SOPs or written protocols for SSO emergency response procedures. Also, there were no written instructions for the consistent completion of overflow response reports. Like proper SSO emergency response training, written protocols for SSO overflow response is critical to conducting consistent SSO event responses. It is evident from the failure of proper reporting (see Finding 2 above) that without written procedures, the Authority is not meeting Permit requirements.

The Collection Section Manager presented the EPA Inspection Team with draft *Overflow Emergency Response Plan* flowcharts which are currently in development, but have not yet been implemented. It should be noted that while the flowcharts may be helpful in guiding crews on proper response steps, a more detailed written SOP should be developed. For example, the flowchart tells the responding crew to "Investigate the cause and stop the sanitary sewer overflow;" however, there is no SOP on the procedure for "stopping" an SSO. Refer to Appendix G for draft copies of the flowcharts.

E. AOC 5. The Authority did not have an effective system for prioritizing service requests.

The Authority has developed a prioritization rating for customer SRs of 1 through 5, with 1 being lowest priority and 5 being an absolute emergency. According to staff at the Authority's dispatch center, the large majority of SRs are coded 4 regardless of the nature of the event, effectively negating any value to prioritizing the SR. According to dispatch staff, a code 4 means that the dispatched crew is expected to finish their current task and then respond in a timely manner, whereas a code 5 would mean immediately stop the task at hand and respond as soon as possible. A failure to differentiate the priority could cause crews to become complacent in their response and could affect the response time or level of effort for a large or significant overflow event.

Authority representatives provided the EPA Inspection Team with a log of 2,238 SRs generated by the CMMS for SRs occurring between January 1, 2011 and September 25, 2012. Of the 2,238 SRs, 1 event was rated as *Priority 1*; 8 events were rated as *Priority 2*; 11 events were rated as *Priority 3*; 1,294 events

were rated as *Priority 4*; 20 events were rated as *Priority 5*; and 904 events did not have a priority rating recorded. This equates to 98 percent rated as no priority or *Priority 4*.

F. AOC 6. The Authority does not investigate the actual start time of SSO events.

According to staff at the Authority's dispatch center, no attempt is made to determine the actual start time of an SSO event. Dispatch center staff stated that they identify the start time of an overflow as the time that the SR for the event was generated. While this is a reasonable approach, some level of investigation could improve reporting. For example, the caller could be asked whether the SSO was reported as soon as it was observed, or if there was a delay between observation and reporting. The EPA Inspection Team recommended that a written, standard line of questioning be implemented by dispatch staff to aid in determining detailed information about SSO events, such as actual start time.

G. AOC 7. The Authority does not have a formal written Sewer System Management Plan or Sewer System Operation and Maintenance Manual(s).

According to the Collection Section Manager, the Authority does not have a Sewer System Management Plan (SSMP) or Sewer System Operation and Maintenance Manual(s). Mr. Holstad did indicate that the Authority is developing and will soon implement work flowcharts to be used as guides for O&M protocols. The EPA Inspection Team recommended developing an additional document which describes specific sewer system protocols in detail, including but not limited to training, preventive O&M, SSO response, SSO reporting, short interval cleaning, and emergency response. Such a document should be directed at Authority staff as well as any contractors servicing the sewer system.

H. AOC 8. There was inconsistent use of terminology on various forms and records.

The EPA Inspection Team observed that there was inconsistent use of terminology on various forms and records. For example, the term flushing and the term cleaning were used interchangeably on SR forms. This becomes pertinent when reviewing historic records to determine an accurate description of a past activity. For example, if cleaning is read as meaning flushing, when cleaning could have actually have meant root-sawing, then future maintenance decisions could be based on erroneous information. Standardizing terminology will also make querying historical work orders in the CMMS more accurate. This is the type of issue that could be addressed in written SOPs and a collection system O&M manual.

I. AOC 9. Implementation of a Fats, Oils and Grease Program

The Authority conducts a pretreatment program that includes food service establishment (FSE) inspections for compliance with grease interceptor requirements. According to the *Revised Corrective Action Plan* (see Appendix C), The City notified the Authority that there are approximately 2,200 restaurants, schools, bakeries, senior centers, meat markets, and daycare centers that prepare or serve food within the Authority's service area. The City provided the Authority with the one-time list of FSEs but according to Authority representatives, there is no formal ongoing procedure for the City to notify the Authority of a new FSE. The Authority is only made aware of a new FSE by happenstance when observing a new FSE during field activities.

J. AOC 10. Modifications to reports did not include identification or date.

Multiple SSO event reports were modified (i.e., corrected or changed) following initial preparation by the use of correction fluid or simply by writing over the initial information. The modifying individual was not typically identified on the form nor was the initial information still legible. In addition, the modification was not typically dated. Both pieces of information are desirable for reference should any of the information be examined in the future. The Authority should consider adopting a policy of making a

single strike-through of the original entry and providing initials (and preferably a date) adjacent to the change; these practices are similar to those commonly found on laboratory forms. Examples of this concern are presented in Appendix E.

K. AOC 11. Inconsistencies were found between separate documents reporting the same event.

A review of multiple documents contained in an individual SSO event file revealed inconsistencies between records that present the same information. For example, the SR call log would report one time for a call while the *Field Division/Collection Section Condition Report* form would record a different time for the same call (refer to Appendix E for supporting examples). The EPA Inspection Team recommended that written procedures and quality control procedures be implemented for filling out SRs, *Field Division/Collection Section Condition Report* forms, and other spill reports to ensure quality and consistency of the information reported.

V. OTHER PERTINENT OBSERVATIONS

A. Asset Management Plan and Decade Plan

The Authority has developed an Asset Management Plan (dated 2011, prepared by GHD, Inc.) and a Decade Plan, FY 2012-2021 for the sanitary sewer system. The purpose of the two plans is to document the current state of the assets owned and maintained by the Authority, and to establish capital expenditures and long term goals for O&M (e.g., rehabilitation and replacement) as well as financial projections.

The Asset Management Plan documents the condition of all Authority assets and establishes a long range renewal program (i.e., 100 years) and associated expenditures. The Decade Plan sets priorities for spending in the coming 10 years based on an asset business risk score. The 10-year plan is generated to provide the Authority with a more accurate understanding of the short and intermediate-term renewal requirements.

B. Broadway Boulevard and Avenida Caesar Chavez SSO

During the inspection, the EPA Inspection Team reviewed a number of SSO event report documents. The most significant events reviewed were two SSOs occurring in the same sewer segment at Broadway Boulevard and Avenida Caesar Chavez, one on April 14, 2011 and the other on April 19, 2011. Both SSOs were the result of collapses in the Edith Interceptor (54-inch reinforced concrete pipe). The April 14, 2011 event lasted for approximately seven hours, and the April 19, 2011 event lasted approximately 14 hours. Both events were reported to have been greater than 1,000 gallons in volume though no accurate volume was reported. Neither spill was reported within 24 hours or the Authority becoming aware of the spill; however, both spills were reported in the day following the spill.

According to Authority staff, the spills were mitigated by allowing the overflows to enter a nearby storm drain or to flow approximately one half mile down the street in order to discharge into a stormwater detention pond. Wastewater which entered the detention pond flowed to a wet well of the detention pond's stormwater pump station where it was contained. The contained wastewater was then pumped back into the sanitary sewer, bypassing the collapsed segment. Authority staff further stated that multiple vactor trucks were deployed in order to clean pooled and overflowing wastewater in the street. Three of these trucks had bypass capability, meaning they could pump wastewater directly back into the sanitary sewer without using a tank. It was reported that the April 14, 2011 spill was disinfected with 600 lbs. of chlorine, and the April 19, 2011 spill was disinfected with between 600 and 1,000 lbs. of chlorine. The collapsed segments of pipe have since been replaced. Refer to Appendix H for the spill reports for these two events.

APPENDIX A – Field Activity Log

The following table presents the observations the EPA Inspection Team made at assets visited during the inspection.

Asset/Location	Date and Time of Inspection	Photo Log Reference	Observations/Description
Pump Station No. 20	September 25, 2012 1:45 PM	1 - 4	Pump Station No. 20 consists of seven pumps driven by four variable frequency drives (VFDs). There are two buildings on the pump station site, one with four pumps which are the primary pumps and one with three pumps which are used mainly for backup. The station pumps 16 to 17 million gallons per day (mgd) on average from the Westside Interceptor to the WRP. In the case of high flows, wastewater can be stored in wet wells at the station to avoid overflows. The VFDs and pumps can be controlled and monitored via a terminal board control center located inside the four-pump building. A backup power generator was observed on site. There were no issues of concern noted during the visit.
Vacuum Station Nos. 61 & 64	September 25, 2012 2:20 PM	5,6	In addition to pump stations, the sewer system also has 10 vacuum stations which "pull" water through the lines instead of push it through like a typical pump station. Each vacuum station can service approximately 10,000 residents. Wastewater enters a vacuum pit until a volume of approximately 10 gallons is reached, triggering the vacuum to turn on and pull/suck the wastewater downstream. There were no issues of concern noted during the visit.
Dispatch Center at Duncan McRae Water System Control Center, Pino Yards	September 25, 2012 3:15 PM	N/A	The EPA Inspection Team interviewed dispatch center staff about routine and after hours protocol for receiving calls, dispatching SSO response crews, and generating and updating SRs. Concerns regarding SR priority setting were identified and are discussed in this report.
Sewer system short interval cleaning crew	September 25, 2012 5:00 PM	7,8	The short interval cleaning crew was performing step cleaning in an alleyway hot spot. The EPA Inspection Team observed the crew jet the line at increasing distance intervals and vacuum flush grease and debris. Concerns regarding a lack of written cleaning procedures were identified and are discussed in this report.
Responding field crew at location of three past SSO events: Roseberry Road & Blumenshine Circle	September 26, 2012 10:42 AM	9, 10	SSOs occurred at this location on three separate occasions within approximately a five-week timeframe. The cause was determined to be a biofilter device installed in an upstream manhole becoming unattached from its mounting, flowing downstream, and obstructing a flow diversion valve. The obstruction did not allow high flows to bypass into a relief line; instead, it caused the backups. The valve was eventually replaced. There were no other issues of concern noted during the visit.

Asset/Location	Date and Time of Inspection	Photo Log Reference	Observations/Description
Responding superintendents at location of past SSO event: Broadway Boulevard SE & Avenida Caesar Chavez SE	September 26, 2012 11:45 AM	11 through 14	Two SSOs occurred in the same sewer segment at Broadway Boulevard and Avenida Caesar Chavez, one on April 14, 2011 and one on April 19, 2011. Both SSOs were the result of collapses in the Edith Interceptor (54-inch reinforced concrete pipe). Refer to Section V.B of the Inspection Report for additional details. General findings and areas of concern regarding SSO emergency response are discussed throughout the report.
Location of past SSO: Mary Ellen Street NE & Aspen Street NE	September 26, 2012 2:45 PM	N/A	An SSO occurred at this location on April 22, 2012. The EPA Inspection Team observed the vicinity of the SSO as well as the manhole that overflowed. The area appeared stable with normal flow in the segment. General findings and areas of concern regarding SSO emergency response are discussed throughout the report.
Sewer construction project: 1200 block of Mary Ellen Street NE	September 26, 2012 2:55 PM	15	Crews were working to install a new 8-inch sewer line, a manhole, and a 24-inch air jumper line as well as to connect five sewer services to the new line. It should be noted that no active construction was occurring on the day of the inspection. There were no issues of concern noted during the visit.
Location of past SSO: 1203 Mary Ellen Street NE	September 26, 2012 3:00 PM	N/A	An SSO occurred at this location on April 25, 2012 as a result of a contractor doing construction. The EPA Inspection Team observed the vicinity of the SSO as well as the manhole that overflowed. The area appeared stable with normal flow in the segment. General findings and areas of concern regarding SSO emergency response are discussed throughout the report.

APPENDIX B - Inspection Attendance Log Sign-in Sheet

SIGN-IN SHEET (PLEASE PRINT)

Permittee: Albuquerque **Date conducted:** 9/25/12

Permit No.

Name	Title	Organization/ Company	Department	Phone/Email
Jake Allbright	Inspector	EPA Contractor	—	717-440-0344 jake.allbright@epa.com
James Zimmy	Water Enforcement	EPA, DC		202-564-6551 Zimmy.james@epa.gov
Josh Waldmeier	Water Enforcement	EPA Region 6		214-665-8064 Waldmeier.Joshua@epa.gov
BARBARA GASTIAN	COMPLIANCE DIVISION	ABCWUA		873-6958 bgastian@abcwua.org
Sarah Holcomb	& Inspector	NMED SWQB		505-263-5165 Sarah.holcomb@state.nm.us
Daniel Valenta	Inspector	NMED SWQB		505-827-2575 daniel.valenta@state.nm.us
Robert Houston	Enforcement Officer	EPA, Region 6		214-665-8565 houston.robert@epa.gov

Name	Title	Organization/ Company	Department	Phone/Email
Hannah Branning	New Mexico Cordinator Water Enforcement	EPA		214-665-7489 branning.hannah@epa.gov
Barbara Cooney	NMED Environmental Scientist Specialist	NMED	Surface Water Quality Bureau (SWQB)	505-827-0212 barbara.cooney@State.nm.us
CRAIG BLETT	INSPECTOR	PG		303 279 1778
~~Jeff~~ Charles S. Leder	Acting Manager Plant Operations Div.	ABCWUA	Plant Operations Division	505-873-7072 cleder@abcwua.org
Dr. James H. Olsen, Jr.	FIELD DIVISION MGR	ABCWUA	FIELD	505-857-8235 JOLSEN@ABCWUA.ORG
Mark Halstad	Collection Section Manager	ABCWUA	Field	505-873-7019 mhalstad@abcwua.org
Patricia Coriego	Collection Section Superintendent	ABCWUA	Field	505 235-3340 Pgriego@abcwua.org

~~Amy~~

Name	Title	Organization/ Company	Department	Phone/Email
Angelo Baca	Assistant Superintendent Planner/Scheduler	ABCWUA	Field Division	arbaca@abcwua.org 873-7003 - 228-7428
John Stomp	Chief Operating Officer	ABCWUA	Administration	jstomp@abcwua.org (505) 768-3631
Joey Nogales	Operations Superintendent	ABCWUA	Operations Swap	505-980-4343 / jnogales@abcwua.org
Jeffrey Romanowski	Chief Engineer	ABCWUA	Plant - Wastewater	8737035 jromanowski@abcwua.org
Jane DeRose-Bamman	Program Manager/ NPDES	ABCWUA	Compliance Division	505-873-3696 jderosebamman@abcwua.org
Mark Kelly	Industrial Waste Engineer	ABCWUA	Compliance	873-7047 mkelly@abcwua.org

APPENDIX C - Authority's Revised Corrective Action Plan (dated April 12, 2012)

Albuquerque Bernalillo County
Water Utility Authority

JA
9-25-12
PO Box 1293
Albuquerque, NM 87103
505-768-2500
www.abcwua.org

April 12, 2012

John Blevins
Director
Compliance Assurance and Enforcement Division
EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Re: Supplemental Response to the Administrative Order CWA-06-2011-1777

Dear Mr. Blevins:

The Albuquerque Bernalillo County Water Utility Authority (Water Authority) discussed some modifications and request for additional information in a telephonic conversation on February 29, 2012. This response and revised Corrective Action Plan and CPM Schedule of Activities are submitted as requested which include the following:

- Additional schedule information regarding the implementation of the CMOM program
- Revised schedule of Construction Activities to focus on the priorities as developed by the Water Authority staff and consultants.

The Authority's understanding of the process is that we will receive two Consent and Final Orders for the SSO's (CMOM program) and Effluent Violations. In addition, we understand that there may be a fine levied against the Water Authority for the fish kill violation that occurred in March 2010. Mr. Charles Kolberg is the Authority's in-house General Counsel and will be the primary contact for the discussions and negotiations on the Consent and Final Orders. Mr. Kolberg can be reached at (505) 768-3646 or ckolberg@abcwua.org.

The Water Authority would like to schedule a meeting with your staff in Dallas to discuss the Revised Corrective Action Plan and the two Consent and Final Orders.

If you have any questions or need additional information on this Supplemental Response, please do not hesitate to contact me at (505) 768-3631 or jstomp@abcwua.org.

Sincerely,

John M. Stomp III, P.E.
Chief Operating Officer

cc: Ms. Sonia Hall
Water Enforcement Branch (6EN-WC)
EPA, Region 6
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733

Mr. Glenn Saums
Acting Bureau Chief
Surface Water Quality Bureau
New Mexico Environment Department
P.O. Box 5469
Santa Fe, NM 87502-5469

Joe Chwirka, Plant Division Manager
Barbara Gastian, Compliance Division Manager
Jim Olsen, Field Division Manager
Mark Holstad, Chief Engineer, Collections
Jeff Romanowski, Chief Engineer, Plant

REVISED CORRECTIVE ACTION PLAN
APRIL 2012

Albuquerque Bernalillo County Water Utility Authority
Revised Corrective Action Plan
April 12, 2012

The Water Authority submits the following Revised Corrective Action Plan (CAP) developed to address short-term and long-term exceedances at the Southside Water Reclamation Plant and to develop a Capacity, Management, Operations and Maintenance (CMOM) program. This reflects discussions at the meeting on July 12, 2011 and our phone conversation on February 29, 2012. Details of the CMOM program along with schedule modifications are provided in the paragraphs below. In addition, the Water Authority re-evaluated the timing and scheduling of the rehabilitation and reconstruction projects at the Southside Water Reclamation Plant. A description of the projects and how the Water Authority proposes to implement them is provided following the CMOM program.

1. Capacity, Management, Operations and Maintenance (CMOM)

The Water Authority commits to implementing a CMOM program over the next five years. To date, the Water Authority-Collections Section has implemented many of the program requirements of CMOM because they are good practice and meets the goal of reducing and eliminating preventable sanitary sewer overflows (SSOs). The Water Authority will continue to build on and accelerate the existing programs and implement a plan to fill in the gaps.

When developing internal goals and objectives, it was determined that the Water Authority's SSO rate as compared to other similar systems was very low. An in-house evaluation of system SSOs helped to better understand the metropolitan area system and the root causes for SSOs. It was determined:

- The greatest reduction in SSOs will occur through improved O&M.
- Relatively fewer SSOs will be eliminated through accelerated FOG control or accelerated rehabilitation.
- Infiltration and Inflow (I/I) is not a problem in the Authority's collections system nor is hydraulic capacity.
- Hydrogen sulfide is a major problem in the Authority's system, causing corrosion, collapses and odor complaints.

Plan for Improved Operation and Maintenance (O&M):

The plan is tailored to the Albuquerque metropolitan system, including its conditions, configuration and complexity. A program of improved O&M is proposed, including necessary management. The Water Authority will attempt to continuously improve the performance by identifying gaps and implement best O&M practices. The improvements for each of the CMOM areas are identified below and are separated by the type of system (i.e., gravity or lift station).

Albuquerque Bernalillo County Water Utility Authority
Revised Corrective Action Plan
April 12, 2012
Page 2

Gravity System

The Water Authority has programmed major increases in Closed Circuit Television (CCTV) inspection. In FY10-11, the Water Authority inspected most of the large diameter (≥12-inches) unlined concrete interceptors. Under the CMOM program, the Water Authority proposes to televise five percent per year of the small diameter (<12-inches) prioritized by risk ratings and to re-inspect the large diameter unlined concrete interceptors in the fifth year. The CCTV data will be used to determine the priority of Preventative Maintenance (PM) cleaning and how to mesh with the upcoming Capital Improvement Program (CIP).

Schedule for CCTV:

Year 1 – 4:	CCTV 5% per year of the small diameter lines (total 20%)
Year 5:	CCTV 80% of possible high risk un-lined large diameter lines (total 80%)
Year 6 – 9:	CCTV 5% per year of the small diameter lines (total 40%)
Year 10:	CCTV 80% of possible high un-lined risk large diameter lines (total 80%)
Year 11 – 14:	CCTV 5% per year of the small diameter lines (total 60%)

This program will remain in place in perpetuity with 5% per year of the small diameter for four years with the fifth year completing 80% of the possible high risk un-lined large diameter lines.

The Water Authority established an internal SSO reduction committee to evaluate and determine the root cause of each reportable overflow and property damage. The existing committee has been working for more than 2-years and consists of staff from the Collection Section. The committee examines each case and attempts to identify the cause and develop a mitigation plan for that section of line. Based on the analysis, the Operation and Maintenance program was changed to include some or all of the following:

- Prohibition of back flushing except with Supervisor permission
- Utilization of barricading to allow flushing from the downstream manhole.
- Resolution of access to currently inaccessible manholes.
- The work order will be modified for specific tools to be used on specific line segments.
- Identification of needed rehab or replacement that are then forwarded for inclusion in the next CIP project.

- Purchased root saws and set up procedure / responsibility for trading in old for new.
- Where a pipe-related defect, e.g. roots, is not identified as the cause of the SSO, Pretreatment Section personnel are requested to follow up with potential upstream sources.

These studies have resulted in a better understanding of what portions of the system are more likely to experience overflows and what conditions need to be addressed.

The following list summarizes a portion of the existing program that the Water Authority will be incorporating and improving with the expanded CMOM program:

a. Develop tool selection software based on pipe conditions.
   - The Water Authority has migrated to PACP condition rating system for CCTV inspections.
   - The Water Authority has implemented *inspectIT* as its CCTV software and has integrated *inspectIT* with *Maximo* (the work order tracking software system). Defects identified per PACP will be documented in *Maximo*. The proper nozzle will be selected for the CCTV-identified defects and this nozzle will be identified in the CMMS created work order

Schedule: This implementation of the software is ongoing and should be complete by December 2013. However, modifications and improvements in the software and our understanding of our system will continue in perpetuity.

b. Evaluate chemical root control versus mechanical removal.
   - Root control is a one solution to reduce SSOs.
   - The Water Authority currently exclusively utilizes mechanical root removal via its fleet of Vactors.
   - Chemical root control will be tested and evaluated.

Schedule: The Water Authority commits to complete a one-time pilot program for application of chemical root control which will be complete by June 2013 and will be studied for two years to determine the efficacy of the program. A report of the evaluation and any changes or additions to update the root control program will be implemented by June 2015.

c. Geographical Information Systems (GIS) and CMMS
   - The Water Authority utilizes GIS and CMMS programs.
   - These programs are continuously being upgraded as needs are identified.

Schedule: This activity is ongoing and will continue in perpetuity.

d. Hydraulic model
   - The Water Authority developed an interceptor hydraulic model in 2009.
   - The model shows no need for capacity increases to meet current flow rates.
   - The Water Authority will maintain and upgrade the model to address development.

Schedule: This activity is ongoing and will continue in perpetuity.

e. Training and Benchmarking
   - The Water Authority supports continuous staff training, education, benchmarking relative to peer systems, and attendance at technical conferences.

Schedule: This activity is ongoing and will continue in perpetuity.

f. Sub-Basin Short Interval Cleaning Program
   - Sewer system divided into sub-basins (total of 44)
   - Sub-Basin cleaning completed on a sub-basin to sub-basin process fully cleaning one and then moving to another
   - Short interval program improvements to focus cleaning efforts on the line segments that have SSO's, root problems or other issues that require more attention

Schedule: This activity is ongoing and will continue in perpetuity.

Fats, Oil and Grease (FOG) Reduction Program

The Sewer Use and Wastewater Control Ordinance states that as of December of 2010 all food establishments that were previously exempt from installing grease traps must have them installed. The Pretreatment Section of the WUA has initiated a FOG program to ensure compliance with the ordinance. The program consists of several parts:

- A list of food establishments was obtained from the City of Albuquerque Environmental Health department and Bernalillo County Environmental Health department. These lists established approximately 2200 restaurants, schools, bakeries, senior centers, meat markets, and daycare centers that are preparing and/or serving food in the service area.
- Monitoring Technicians are in the process of visiting each of these food establishments to determine if they have a grease trap and if it is in good working order. Grease management literature is distributed. To date, 100% of the food establishments have been surveyed at least once.

- Results of the grease trap inspections are entered into a dedicated database, *Linko*FOG. *Linko*FOG allows mass mailing letters to be sent to food establishments not in compliance. Since 2007, over 2,400 inspections have been performed at food establishments. From these inspections, it has been found that 15% do not have a grease trap.
- When requested by the Collection Section, Pretreatment personnel perform SSO follow-ups. These follow-ups scour the area upstream of a SSO including canvassing of food establishments to determine if they caused the SSO. Water Authority grease abatement information is handed out. Beginning this year, eight SSO's have been investigated by pretreatment staff. Seven SSO's are in the process of being investigated for FOG issues.
- Enforcement (Notice Of Violation) has begun on food establishments that do not currently have grease traps. Once notified, owners have 15 days to submit a plan of action to be in compliance with the ordinance. Owners will have one year to install a functioning grease trap. To date, one NOV has been sent to a local restaurant.

Lift Stations

1. The Water Authority will re-implement regular testing of emergency standby generator systems at all lift stations. All of the issues identified will be resolved to keep primary and backup system operational. The testing is scheduled at least once per year.
2. The Water Authority will implement a CMMS work order management program by the end of 2013.
3. A Lift Station Asset Management Plan (AMP) is underway and will be completed by June 2013. The Lift Station AMP will be used to assist in making decisions about prioritization of rehabilitation work for the next ten years.

Overflow Response and Audit

In addition to the existing programs and improvements above, the Water Authority will create a written overflow response plan that identifies specific processes in responding to and reporting SSOs. The process will be mapped working with the existing staff and training will follow the development of the process flow diagrams and Standard Operating Procedures.

The Water Authority commits to performing an in-house self-audit based on the EPA Region 4 form (unless Region 6 has a similar form). The results of the audit will be presented to the Water Authority management to identify issues that need to be improved or addressed to reduce SSOs.

Schedule: The Draft Overflow Response plan and audit will be complete by July 2013. Revisions will be made as the program is developed with the Final Overflow Response Plan and Audit complete by July 2014.

Annual Report

An in-house annual report will be developed that includes the following:

1. SSOs
   - Tabulate number of SSOs of various kinds.
   - Compare SSO rate to peer utilities.
   - Document causes and mitigations.
2. FOG enforcement: Document number of grease traps inspected, NOVs issued and resolved SSO follow-ups.
3. Odor complaints
   - Tabulate number of odor complaints by month.
4. Identify gaps in the Water Authority processes.
5. Provide recommendations to close the gaps. This may result in modified O&M processes or CIP.

Schedule: The annual report by be completed by April 1st of every year for the previous year.

2. Compliance Reporting Protocol

The Compliance Division will now be responsible for reviewing and approving the submittals prior to issuance to EPA. The Plant and Compliance Division will cooperate to get a draft copy of the Discharge Monitoring Report (DMR) within 48-hours of submittal. The Compliance Division will review the DMR and will produce the transmittal letter for signature and will file the report. All reports shall be posted and stored electronically by the Compliance Division.

3. Rehabilitation and Reconstruction Compliance Plan

Based on the discussions at the July 12, 2011 meeting and subsequent phone conversations, there have been revisions to the rehabilitation and reconstruction plan to specifically address compliance issues at the SWRP. The sequence of construction proposed and the timing for each of the rehabilitation and reconstruction projects was developed to keep the facilities at the plant operating and to coordinate tie-ins and startup. The list of projects provided are those that are needed to bring the plant into compliance and do not represent all of the proposed reconstruction efforts that are planned by the Water Authority. For example, the Water Authority plans to construct a new Operations and Maintenance Building and to completely landscape the facility but neither of these projects will be discussed because they are not important to permit compliance. New digester capacity is shown, but is not critical to compliance but is needed for additional capacity in the future.

Projects Recently Completed:

Ultraviolet Disinfection

The UV plant was recently completed with startup and operations beginning on April 13, 2011. The facility has been operating satisfactorily and is intended to reduce or eliminate fecal coliform and chlorine violations at the Plant.

Final Clarifiers

All twelve of the existing final clarifiers have been rehabilitated and mechanisms replaced. The final clarifier work was scheduled with the completion of the ultraviolet project to reduce solids excursions. The two facilities have been functioning efficiently with no violations.

Projects Under Construction:

SCADA Upgrade and Fiber Optic

The Water Authority will be upgrading the existing SCADA and plant communications facilities throughout the plant. The work consists of replacement of the outdated system with new servers and workstations that will greatly improve operator interface and provide useful trending and other data with the new *Historian* package. In addition to the SCADA upgrade, the communication lines throughout the plant are being replaced with high speed fiber optic and new coaxial cable. All of these upgrades are needed to integrate with the new operating systems used when the other reconstruction projects come on-line. The SCADA and communication improvements are scheduled to be completed by December 2012.

Southside Reuse Project

This project will provide filtered and chlorinated effluent for non-potable uses at the plant. The current reuse system is in need of complete replacement and this project is under construction and will be operational for use at the wastewater treatment plant in May 2012.

Projects Scheduled for Construction:

The first four major new projects in the construction sequence were those identified by the outside consultant from a capacity evaluation and asset assessment of the SWRP process areas. The areas in need of immediate capacity improvements or rehabilitation were the bar screens, grit removal, dewatering and aeration blowers. Therefore, these projects were prioritized first in
Albuquerque Bernalillo County Water Utility Authority

the sequence of construction and are shown on the CPM chart located at the end of this attachment. The remaining projects were aligned based on need and the ability to have multiple construction activities at the plant while continuing to operate and to comply with the permit. The new digester complex schedule follows the majority of the rehabilitation of the existing digesters.

Preliminary Treatment Facility (PTF)

The original design concept of constructing the PTF facility with the new Dewatering complex at a location significantly away from the existing facilities was over designed and considerably over budget. The redesigned PTF facility will be located adjacent to the existing PTF to simplify the construction. The redesigned project will completely replace the existing screening and grit removal. Grit removal has plagued the operations at the plant for many years and the new PTF facility will include a completely new grit removal system. Also, the existing bar screens which were replaced a couple of years ago will be moved from the existing facility to the new PTF.

Major Operational and Construction Issues:

- There are three major interceptors that come into the wastewater plant. All three will need to be re-routed to the new PTF facility while the plant remains in operation.
- Installation of new instrumentation and communication systems

Schedule:

The redesign of the project will be under design by the end of May 2012 with construction complete in September 2015.

Dewatering Complex

A total of three new centrifuges (one moved from the existing building) with location for a spare will be installed in the redesigned Dewatering Complex which will be located adjacent to the existing facility.

Major Operational and Construction Issues:

- Moving the existing centrifuges to the new facility
- Continued operation and potentially moving the existing sludge bins
- Installation of new instrumentation and communication systems

Schedule:

The redesign of the project will be under design by the end of June 2013 and with construction complete in May 2015.

Interim Blower Capacity Improvements

This project will replace a portion of the existing centrifugal blowers with a more efficient type. The interim project will replace a portion of the blowers in the north blower building and move the centrifugal blowers to the south blower building. This will provide additional air capacity and redundancy until the blower building rehabilitation project can be designed and constructed.

Major Operational and Construction Issues:

- Continued operation of the existing facilities during construction
- Replacement of the existing blowers with new more efficient blowers
- Electrical, instrumentation and motor control center improvements

Schedule:

The project is under design proposals for the blowers have been requested. The lead time for new blower equipment is long and thus allows adequate time to implement electrical and mechanical improvements as needed for the new blowers and relocation of the existing blowers.

Final Blower Rehabilitation Project

The final project will include full expansion of the blower facilities that will include a mix of both centrifugal and larger more efficient blowers. The North Blower complex will house all of the blowers and the south blower complex will be phased out. The project will include renovation of the existing north blower building to accommodate all of the air needs.

Major Operational and Construction Issues:

- Continued operation of the existing facilities during construction
- Total replacement of the existing blowers with new more efficient blowers
- Demolish existing south blower building
- Electrical, instrumentation and MCC improvements

Schedule:

This project will be designed when the interim improvements have been complete and operations. Completion of the project is scheduled for May 2017.

Aeration Basin Piping and Rehabilitation Project

The improvements planned for the aeration basins include air piping, valve and flow meters, foam control systems, spray and wash water systems, RAS pumping improvements and replacement of existing ceramic diffusers with membrane diffusers.

Major Operational and Construction Issues:

- Permit compliance with air piping and diffuser replacement

Schedule:

The design of the improvements will follow the blower evaluation and construction will commence with the blower project, but will be complete in October 2014.

Existing Digester Rehabilitation Project

The existing digesters are in need of structural improvements due to deterioration of the covers that are leaking gas and producing odors. In addition, the mixers need to be rehabilitated and replaced when the covers are replaced. Other improvements include electrical and instrumentation, hot water loop system, low pressure gas system, and sludge withdrawal.

Major Operational and Construction Issues:

- Implementation will take place on one or two digesters at a time so as to minimize impacts on sludge digestion operations. It will take several years to complete all ten primary and four secondary digesters.
- Meeting the Part 503 regulations during the rehabilitation project
- Sludge storage capacity – blending tank and secondary digesters

Schedule:

The analysis of the various structural and cover alternatives is underway to determine what modifications are needed to add new mixers and repair the leaks. It is anticipated that all of the digesters will be rehabilitated by the end of September 2018 at a rate of one or two per year.

Dissolved Air Floatation (DAF) Thickening Improvements

The Water Authority needs to evaluate the existing DAF system and make recommendation for complete replacement or rehabilitation. There is a need to evaluate the current state of technology and decide if the existing facilities can be modified to accommodate the new technology or should be replaced. The study phase should be complete by early 2014. If the existing DAF buildings are to be rehabilitated, then design will be completed and begin to rehabilitate them one at a time.

Major Operational and Construction Issues:

- Coordination with the Digester rehabilitation work
- Continuing to operate two units while other is rehabilitated
- Pipeline from DAF to existing and new sludge blending tank

Schedule:

Completion date for all three units is October 2015.

Primary Clarifier Improvements

The Design Analysis Report for the primary clarifiers has been authorized and a final draft has been completed, but additional analysis may be required. Based on the current recommendations, the Water Authority will be authorizing the design which will begin something in March 2014. The project will most likely be a combination of new clarifiers and rehabilitation of the existing clarifiers.

Major Operational and Construction Issues:

- Coordination with the digester rehabilitation project
- Need to keep all of the primary clarifiers operational until significant progress is made with the digester renovations project
- Construction of the PTF will have major impact on the area of the new primary clarifiers including piping, electrical and communication.
- Coordination of tie-ins, shutoffs and other activities with the plant staff and other contractors

Schedule:

The design should be complete around March 2015 with construction complete by March 2018.

New Digesters

There will be a need for additional digester capacity to meet future flow requirements and to provide operational flexibility for meeting the Part 503 regulations. At the current time, it is anticipated that there may be a need for two additional digesters and possibly more may be needed in the future. New digesters will be co-located for operational purposes adjacent to the existing digesters. There may also be a need for additional sludge blending prior to and following the digesters which will also be included. Liquid storage will also be examined prior to dewatering for additional solids handling flexibility.

Major Operational and Construction Issues:

- Coordination with the existing digester rehabilitation project
- Location of the new digesters and issues with relocation of existing facilities if necessary
- Coordination of tie-ins, shutoffs and other activities with the plant staff and other contractors

Schedule

The design of the new digesters will begin in November 2015 when the DAF improvements project is complete with construction complete sometime around the end of calendar year 2019.

Other Plant Improvements and Increased Repairs and Maintenance Budget

There are numerous miscellaneous plant improvements that will need to be completed as the above projects are implemented. The Water Authority has increased the repairs and maintenance budget for these smaller systems to keep up with the scheduled activities.

Albuquerque Bernalillo County Water Utility Authority
Revised Corrective Action Plan
April 12, 2012
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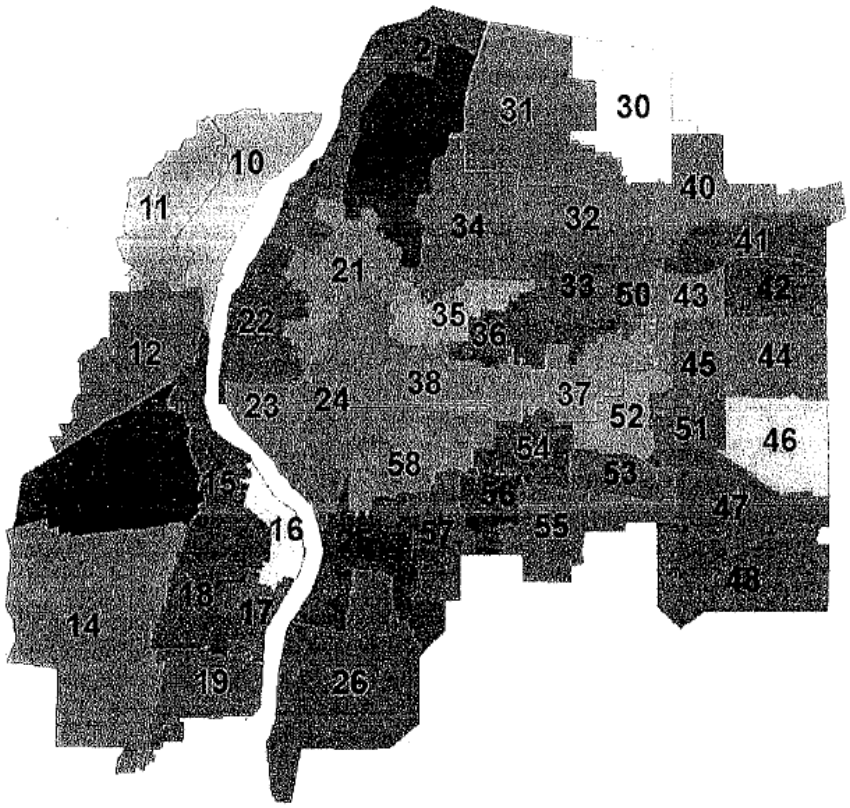
Summary of the Construction Activities

The Water Authority is committed to completing the ongoing and planned construction projects in the time provided in the CPM schedule. Many unforeseen issues may be encountered during implementation and time needed to resolve these issues. Coordination between the construction projects and ensuring continued compliance with the discharge permit is very important to the Water Authority. With the present schedule, there will be anywhere from three to five projects under construction at the same time for a little more than five years which will be very challenging. The total estimated construction cost is around $135,000,000 which computes to more than $ 2,000,000 per month of work to be accomplished for 60 plus months. That is a significant amount of sustained work over the period of time and will certainly add stress to the operations just with the logistics of contractor material and equipment storage, access inside and around the plant during construction, coordination with operations and maintenance staff and the most important issue of communication.

Water Authority Collection System Subbasin Map (44 Total)



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APPENDIX D - List of SSOs Reported to EPA by Authority (January 15, 2010 through August 1, 2012)

DATE:	LOCATION:	AMOUNT:	CORRECTIVE ACTION:
1/15/2010	13009 Skyview Ave, NE Street and Storm drain	51-100 gallons	Treated with chlorine
2/2/2010	10000 Calabacillas, NW Streat and storm sewer	501-1000 gallons	Removed solids; removed pooled wastewater
1/30/2010	2710 Madeira,NE Street	51-100 gallons	Treated with chlorine
2/21/2010	7000 Bluewater Ave, NW Steet and storm sewer	101-500 gallons	Treated with chlorine
2/5/2010	Morris and Candaleria street	101-500 gallons	Removed solids; treated with chlorine
2/11/2010	7000 Bluewater Ave, NW Arroyo	51-100 gallons	Removed pooled wastewater; treated with chlorine
3/10/2010	Morris and Karen, NE Street and Storm sewer	101-500 gallons	Treated with chlorine
3/8/2010	12200 Lomas Blvd, NE Street and Storm sewer	> 1000 gallons	Treated with chlorine
3/5/2010	2nd St & Montano, NW street	101-500 gallons	Treated with chlorine
2/27/2010	Eucariz & 82nd St, NW street	501-1000 gallons	Treated with chlorine
3/15/2010	150 Placitas Road, NW street	51-100 gallons	Treated with chlorine
3/23/2010	Morris & Comanche, NE Street	51-100 gallons	Removed solids; treated with chlorine
4/11/2010	Texas St, NE Street	51-100 gallons	Treated with chlorine
4/2/2010	Hotel Circle, NE Storm sewer	3000 + gallons	Treated with chlorine
4/25/2010	Coronado Ave., NE Storm sewer & arroyo	501-1000 gallons	Removed solids; treated with chlorine
5/3/2010	Bryn Mawr Drive, NE Street & arroyo	101-500 gallons	Treated with chlorine
5/18/2010	Luchetti Rd, SW Dirt field	101-500 gallons	Bermed area to contain spill
5/17/2010	Isleta Blvd, SW street	51-100 gallons	Treated with chlorine

DATE:	LOCATION:	AMOUNT:	CORRECTIVE ACTION:
6/28/2010	Lakeview & Harris, SW Into basement of home	51-100 gallons	Turned over to claims
6/26/2010	Tramway Blvd, NE Arroyo	101-500 gallons	Treated with chlorine
8/3/2010	Eagle ranch Rd, NW Parking lot	51-100 gallons	Treated with chlorine
8/20/2010	Tanager Dr., SW Street	51-100 gallons	Treated with chlorine
8/29/2010	Eubank Blvd, NE Street	101-500 gallons	Treated with chlorine; washed down with water
9/23/2010	Alcazar St., SE Street	51-100 gallons	Treated with Chlorine
10/6/2010	Hackberry Trail, SE Street	101-500 gallons	Treated with Chlorine
10/24/2010	Burma Drive, NE Street	51-100 gallons	Treated with Chlorine
10/27/2010	Lomas & Juan Tabo, NE Street & Storm sewer	101-500 gallons	Solids removed; treated with chlorine
12/1/2010	Zambra Place, NE Street	51-100 gallons	Treated with chlorine
11/20/2010	Veranda & Hoyle Rd., NE Storm sewer	101-500	Solids removed; treated with chlorine
11/20/2010	Trumbull & Conchas Street	51-100 gallons	Treated with Chlorine
11/14/2010	Coronado Ave., NE Street & arroyo	101-500 gallons	Treated with Chlorine
11/28/2010	guadalupe Trail, NW Yard	101-500 gallons	Removed solids; Treated with Chlorine; Removed pooled wastewater
12/29/2010	Eubank & Lagrima del Oro Street	51-100 gallons	Treated with chlorine
1/1/2011	Montano & 4th Street, NW Storm sewer	101-500 gallons	N/A
12/27/2010	Bluewater & 64th St., NW Street	51-100 gallons	Treated with Chlorine
1/3/2011	Golf Course Rd, NW Arroyo	101-500 gallons	No information given on report
2/16/2011	Moutain Rd, NE Arroyo	101-500 gallons	Treated with Chlorine

DATE:	LOCATION:	AMOUNT:	CORRECTIVE ACTION:
2/4/2011	Larkin Rd., SW Street	51-100 gallons	Treated with Chlorine
2/18/2011	Candelaria & Morris, NE Street & Storm sewer	51-100 gallons	Treated with Chlorine
3/5/2011	Coors Blvd, NW	501-1000 gallons	No information given on report
3/14/2011	Kathyrn & Dickerson, SE Street & Storm sewer	51-100 gallons	Removed solids
3/19/2011	Wastegate, SW Arroy	> 1000 gallons	Removed solids
3/20/2011	Comache Ave., NE	101-500 gallons	No information given on report
3/19/2011	Bluewater & 64th St., NW Street	51-100 gallons	No information given on report
3/25/2011	Broadway Blvd., SE Street	101-500 gallons	Removed pooled wastewater; Treated with Chlorine
3/26/2011	Pennsylvania & Rhode Island, SE Street	51-100 gallons	Treated with Chlorine
3/27/2011	Jesse James Dr., SW Storm sewer & Arroyo	101-500 gallons	Treated with Chlorine
3/28/2011	Mojave St., NW Street	51-100 gallons	No information given on report
3/28/2011	Bluewater & 64th St., NW Street & Storm sewer	51-100 gallons	Treated with Chlorine; washed down
4/5/2011	Cathy Ave., NE Storm sewer & Arroyo	101-500 gallons	Treated with Chlorine
4/14/2011	Broadway Blvd & Avenida Cesar Chavez Street	> 1000 gallons	Treated with Chlorine
4/19/2011	Broadway Blvd & Avenida Cesar Chavez Street	> 1000 gallons	Treated with Chlorine
5/9/2011	San Diego Ave., NE Street	51-100 gallons	Removed solids
5/7/2011	General Stillwell St., NE Arroyo	51-100 gallons	Treated with Chlorine
5/12/2011	Candaleria & Pitt Street & Storm sewer	51-100 gallson	Treated with Chlorine; washed down
5/14/2011	Columbus Circle, NW Golf Course	101-500 gallons	Treated with chlorine

DATE:	LOCATION:	AMOUNT:	CORRECTIVE ACTION:
6/7/2011	Avenida de Barranca, NW Street & Storm Sewer	101-500 gallons	Treated with Chlorine; washed down
6/10/2011	Montgomery & Carlisle Street & Arroyo	101-500 gallons	Treated with chlorine
7/5/2011	University & Sunport, SE Storm sewer	51-100 gallons	Removed solids
7/11/2011	University and Sunport, SE Street & Storm sewer	101-500 gallons	Treated with Chlorine
8/21/2011	San Pedro & Topke, NE Street	101-500 gallons	Treated with Chlorine
9/13/2011	Manuel Blvd, NE Storm sewer	101-500 gallons	Treated with Chlorine
10/3/2011	Sunport & I-25 Storm sewer & Arroyo	>1000 gallons	Broken line
11/12/2011	Louisiana Blvd., NE Street	101-500 gallons	Treated with Chlorine
11/18/2011	San Mateo Blvd., NE Storm sewer	101-500 gallons	Treated with Chlorine
11/24/2011	Blumenshine & Roseberry, SW Street & Arroyo	> 1000 gallons	Treated with Chlorine
11/24/2011	Layton Ave., NE Street	> 1000 gallons	Treated with Chlorine
12/8/2011	64th & Bluewater, NW Street & Storm sewer	101-500 gallons	Treated with Chlorine
12/10/2011	64th & Bluewater, NW Street & Storm sewer	101-500 gallons	No solids
12/24/2011	Blumenshine & Roseberry, SW Yard & Dirt lot	> 1000 gallons	Treated with Chlorine
12/31/2011	Blumenshine & Roseberry, SW Open lot	> 1000 gallons	Treated with Chlorine
1/3/2012	Rio Puerco Trail, SW Park	101-500 gallons	Removed solids; washed down
1/3/2012	Altez St., SE Street	51-100 gallons	Removed pooled Wastewater; Treated with Chlorine
1/14/2012	Claremont Ave., NE Street	101-500 gallons	Treated with Chlorine
1/14/2012	64th & Bluewater, NW Street & Storm sewer	51-100 gallons	Treated with Chlorine
1/23/2012	Griegos Rd, NW Street & Parking Lot	101-500 gallons	Treated with Chlorine

DATE:	LOCATION:	AMOUNT:	CORRECTIVE ACTION:
1/25/2012	Nassau Dr., NE Street	101-500 gallons	Treated with Chlorine
1/29/2012	Corrales Rd., NW Yard & Parking lot	> 1000 gallons	Removed solids; Treated with Chlorine
2/9/2012	Luchetti Road, SW Arroyo	> 1000 gallons	Diluted with water
2/19/2012	Chandler Drive, NW Arroyo	51-100 gallons	Washed road with vactor truck
2/17/2012	Sunport Blvd, SE Storm sewer	51-100 gallons	Treated with Chlorine
2/27/2012	Broadway blvd., NE Storm sewer	> 1000 gallons	Bermed area; Treated with Chlorine
3/7/2012	Osuna Road, NE Street	51-100 gallons	Treated with Chlorine
3/10/2012	Riverview Drive, NW Storm sewer	51-100 gallons	Treated with Chlorine
3/25/2012	Orfero Trail, NW Arroyo & Street	51-100 gallons	Removed pooled Wastewater; Treated with Chlorine
4/8/2012	Juan Tabo Blvd., NE Street & Storm Sewer	501-1000 gallons	Treated with Chlorine; Washed down
4/5/2012	Tramway Terrace Loop, NE Street	501-1000 gallons	Pumped
4/19/2012	Four Hills Rd & Pinon Creek Arroyo	101-500 gallons	Treated with Chlorine
4/22/2012	Mary Ellen St & Aspen Avenue Street	> 1000 gallons	Other
4/25/2012	Mary Ellen Street Street & storm sewer	> 1000 gallons	Removed solids; Removed pooled wastewater; Treated with Chlorine & washed down
4/25/2012	Spence Ave., SE Street	101-500 gallons	Removed pooled wastewater; washed down
5/19/2012	Sevilla Avenue, NW Arroyo	> 1000 gallons	Treated with chlorine
5/22/2012	Montgomery Blvd., NE Street & storm sewer	> 1000 gallons	Treated with Chlorine
5/29/2012	Eastridge Drive., NE Street	101-500 gallons	Washed down
5/26/2012	Jade park Ave. & Ray Street, NE Street	101-500 gallons	Treated with Chlorine

DATE:	LOCATION:	AMOUNT:	CORRECTIVE ACTION:
6/23/2012	Irving & Rainbow, NW Street	51-100 gallons	Treated with Chlorine
6/28/2012	Eubank Blvd., NE Street	51-100 gallons	Treated with Chlorine
7/7/2012	Lafayette Drive, NE Arroyo	101-500 gallons	Sewer backed into two apartments; combination cleaning
7/25/2012	Taylor Ranch Road, NW Street	101-500 gallons	Treated with chlorine
7/29/2012	Wyoming & Comache, NE Street	51-100 gallons	Removed pooled wastewater
8/1/2012	Hidden Valley Drive, SE Street	101-500 gallons	Treated with Chlorine; Washed down

APPENDIX E - Field Division/Collection Section Condition Reports

The table below corresponds to the *Field Division/Collection Section Condition Reports* that support findings 2a. through 2e. The reports can be found immediately following the table.

Exhibit Number	Date of Event	Service Request Number	Primary Finding Issue(s)	Primary Finding(s) Supported by Example	Additional Finding(s) Supported by Example
#1	2/26/12	42038	Unreported SSO under 50 Gallons	2a.	2b. & 2e.
#2	2/25/12	42067	Unreported SSO under 50 Gallons	2a.	2b., 2d. & 2e.
#3	12/14/09	10108607	Unreported SSO over 50 Gallons	2a.	2b., 2d. & 2e.
#4	1/24/10	11084	Unreported SSO over 50 Gallons & Inconsistent Recording of Time Crew Notified between Two Reports Documenting the Same Event	2b. & AOC 11.	2b., 2d. & 2e.
#5	12/15/09	10109803	Volume Not Recorded	2c.	2b., 2d. & 2e.
#6	2/17/12	41813	24-hr Reporting Not Met	2e.	2b.
#7	2/19/12	41827	24-hr Reporting Not Met	2e.	2b. & 2d.
#8	4/25/12	44034	Inconsistent Recording of Time Crew Notified between Two Reports Documenting the Same Event	AOC 11.	AOC 10. & 2b.

Appendix E – Exhibit #1

Water Utility Authority

Albuquerque Bernalillo County Water Utility Authority
Field Division/Collection Section
Condition Report

SR# 42038
WO#
Date Reported 2/26/12
Time Crew Notified 12 : 00 ☐ AM ☑ PM
Time Crew Arrived ___ : ___ ☐ AM ☐ PM
Supervisor George Cordova

Name Helen (Property Owner or Reporter) Phone Number 345-0497

Reported Location

From Manhole MAP#	From Manhole MH#	To Manhole MAP #	To Manhole MH #	Line Type	Line Dia.	Occupant Notified
7738	31	7738	25	PVC	8"	☐ Yes ☑ No

Address No. ___ Street Name San Lorenzo & Cherokee Street Type RD Quad NW

Intersecting Street San Lorenzo & Cherokee RD NW

☐ **40 Sewer Backup Comments:** Rags & Grease Came up over ☐ cont. on back

☑ **42 Manhole Overflow – CS ☐ / ANR ☑** (Auth. City Sewer / Auth. Non-Reportable)

Time Of Spill 11 : 30 ☑ AM ☐ PM

Time Spill Was Stopped 12 : 00 ☐ AM ☐ PM

Duration of Spill 2 hrs. 30 mins.

Amount Spilled
- ☑ 1 --- 50
- ☐ 51 --- 100
- ☐ 101 --- 500
- ☐ 501 --- 1000
- ☐ Over --- 1000

Where was Wastewater Spilled
- ☐ Yard
- ☐ Parking lot
- ☐ Street (Dirt)
- ☐ Street (Pavement)
- ☑ Storm Sewer
- ☐ Arroyo (Dirt)
- ☐ Arroyo (Concrete)
- ☐ Other ___

What was done to Clean Area
- ☐ Removed Solids
- ☐ Removed Contaminated Soil
- ☐ Bermed Area to Contain
- ☐ Spill
- ☐ Removed Pool Wastewater
- ☐ Treated with Chlorine Amount Used __Cups __lbs.
- ☑ Other ___

☐ **48 Property Damage – Risk Management** #768 - 3080

List Damages ___

Claim Adiusters Name

Yes	No	
☐	☐	Were Pictures Taken
☐	☐	Does Home Have Basement
☐	☐	Does Home Have Back Water Valve
☐	☐	Is Floor Elevation Below Upstream Manhole

Engineering Comments and / or Recommendations

1st Review Action to be Taken
- ☑ Clean 1 Segments Upstream 1 Downstream Date 3/12/12
- ☑ Televise The Line Date 3/14/2012
- ☐ Root Saw Date ___/___/___
- ☐ Root Foam Date ___/___/___
- ☐ Adjust PM Interval:

Freq. In weeks	Seq. #	Activity #
☐ 4 wks.		
☐ 12 wks.		
☐ 24 wks.		

Date Set: ___/___/___ Int.: ___
- ☐ Notify Pretreatment Date ___/___/___
- ☐ No Further Action Date ___/___/___

Line Maint. Engineer: ___
Date ___/___/___

2nd Review Action to be Taken
- ☐ Root Saw Date ___/___/___
- ☐ Root Foam Date ___/___/___
- ☐ Point Repair Date ___/___/___
- ☐ Submit for Replacement Date ___/___/___
- ☐ No Further Action Date ___/___/___

Line Maint. Engineer: ___
Date ___/___/___

Final Review Action to be Taken
- ☐ Project Complete Date ___/___/___
- ☐ No Further Action Date ___/___/___

Comments: ___

Line Maint. Engineer: ___
Date ___/___/___

Agency	Verbal Notification	Written Notification
NMED	Date ___/___/___ ☐ AM ☐ PM Time ___:___	Date ___/___/___
USEPA	Date ___/___/___ ☐ AM ☐ PM Time ___:___	Date ___/___/___

Appendix E – Exhibit #2

Water Utility Authority

Albuquerque Bernalillo County Water Utility Authority
Field Division/Collection Section
Condition Report

SR# 42016
WO# 11209309
Date Reported 2/25/2012
Time Crew Notified 11 : 00 ☐ AM ☐ PM
Time Crew Arrived 12 : 00 ☐ AM ☐ PM
Supervisor Gonzalez Cordova

Name PASSERBY Phone Number _____
Property Owner or Reporter

Reported Location

From Manhole MAP#	From Manhole MH #	To Manhole MAP #	To Manhole MH #	Line Type	Line Dia.	Occupant Notified
G21	12	G21	022	VCP	8"	☐ Yes ☐ No

Address No. 4009 Street Name Pitt Street Type St Quad NE

Intersecting Street Pitt & NATALIE

☐ 40 Sewer Backup Comments: _____ ☐ cont. on back

☑ 42 Manhole Overflow – CS ☐ / ANR ☑
Auth. City Sewer / Auth. Non-Reportable

Time Of Spill 10 : 00 ☐ AM ☐ PM
Time Spill Was Stopped 12 : 50 ☐ AM ☑ PM
Duration of Spill 2 hrs. 50 mins.

Amount Spilled
☑ 1 --- 50
☐ 51 --- 100
☐ 101 --- 500
☐ 501 --- 1000
☐ Over --- 1000

Where was Wastewater Spilled
☐ Yard
☐ Parking lot
☐ Street (Dirt)
☑ Street (Pavement)
☐ Storm Sewer
☐ Arroyo (Dirt)
☐ Arroyo (Concrete)
☐ Other _____

What was done to Clean Area
☐ Removed Solids
☐ Removed Contaminated Soil
☐ Bermed Area to Contain
☐ Spill
☐ Removed Pool Wastewater
☐ Treated with Chlorine
Amount Used__Cups__lbs.
☐ Other _____

☐ 48 Property Damage – Risk Management
#768 - 3080

List Damages _____

Claim Adjusters Name

Yes	No	
☐	☐	Were Pictures Taken
☐	☐	Does Home Have Basement
☐	☐	Does Home Have Back Water Valve
☐	☐	Is Floor Elevation Below Upstream Manhole

Engineering Comments and / or Recommendations

1st Review Action to be Taken
☑ Clean 1 Segments Upstream 2 Downstream
Date 3/8/12
☑ Televise The Line Date 3/14/2012
☐ Root Saw Date ___/___/___
☐ Root Foam Date ___/___/___
☐ Adjust PM Interval:

Freq. In weeks	Seq. #	Activity #
☐ 4 wks.		
☐ 12 wks.		
☐ 24 wks.		

Date Set: ___/___/___ Int.: ___
☐ Notify Pretreatment Date ___/___/___
☐ No Further Action Date ___/___/___
Line Maint. Engineer: _____
Date ___/___/___

2nd Review Action to be Taken
☐ Root Saw Date ___/___/___
☐ Root Foam Date ___/___/___
☐ Point Repair Date ___/___/___
☐ Submit for Replacement Date ___/___/___
☐ No Further Action Date ___/___/___
Line Maint. Engineer: _____
Date ___/___/___

Final Review Action to be Taken
☐ Project Complete Date ___/___/___
☐ No Further Action Date ___/___/___
Comments: _____
Line Maint. Engineer: _____
Date ___/___/___

Agency	Verbal Notification	Written Notification
NMED	Date ___/___/___ ☐ AM ☐ PM Time ___:___	Date ___/___/___
USEPA	Date ___/___/___ ☐ AM ☐ PM Time ___:___	Date ___/___/___

Appendix E – Exhibit #3

Albuquerque Bernalillo Co.
Water Utility Authority
Field Division/Collection Section
Condition Report

Control Card # 10108607
Date Reported 12/14/09
Time Crew Notified 7:45 ☑ AM ☐ PM
Time Crew Arrived 8:25 ☑ AM ☐ PM
Foreman G. Lucero

Name _____ Phone Number _____
Property Owner or Reporter

Reported Location

From Manhole MAP#	From Manhole MH#	To Manhole MAP#	To Manhole MH#	Line Type	Line Dia.	Occupant Notified
E19	985	E19	988	VCP	8"	☐ Yes ☐ No

Address # 8010 Street Name Academy Street Type Rd Quad NE

Intersecting Street Wyoming & Academy

☐ 40 Sewer Backup Comments: _____ ☐ cont. on back

☑ **42 Manhole Overflow**

Time Of Spill 7:45 ☑ AM ☐ PM
Time Spill Was Stopped 8:50 ☑ AM ☐ PM
Duration of Spill 1 hrs. 5 mins.

Amount Spilled
☐ 1-50 gallons
☑ 51-100 gallons
☐ 101-500 gallons
☐ 501-1000 gallons
☐ over 1000 gallons

Where was Wastewater Spilled
☐ Yard
☐ Parking lot
☑ Street (Dirt)
☑ Street (Pavement)
☐ Storm Sewer
☐ Arroyo (Dirt)
☐ Arroyo (Concrete)
☐ Other _____

What was done to Clean Area
☑ Removed Solids
☐ Removed Contaminated Soil
☐ Bermed Area to Contain spill
☐ Removed pool Wastewater
☐ Treated with Chlorine
Amount used ____cups. ___ lbs.
☐ Other _____

☐ **48 Property Damage** Risk Management # 768-3080 After Hours Pager # 841-6941

Claim Adjusters Name _____
Year of Home _____

List Damages _____

Yes	No	
☐	☐	Were Pictures Taken
☐	☐	Does Home Have Basement
☐	☐	Does Home Have Back Water Valve
☐	☐	Is Floor Elevation Below Upstream Manhole

Engineering Comments and / or Recommendations

1st Review Action to be Taken
Clean 1 Segments upstream, 3 downstream
Date 2/17/10 YH
Televise the line. Date ___/___/___
Root Saw. Date ___/___/___
Root Foam. Date ___/___/___
Adjust PM Interval:

Freq. In weeks	Seq. #	Activity #
☐ 4 wks.		
☐ 12 wks.		
☐ 24 wks.		

Date Set: ___/___/___ Int.: ____
Notify Pretreatment Date ___/___/___
No Further Action Date ___/___/___
Maint. Engineer: _____
12/22/09

2nd Review Action to be Taken
☐ Root Saw Date ___/___/___
☐ Root Foam Date ___/___/___
☐ Point Repair Date ___/___/___
☐ Submit for Replacement Date ___/___/___
☐ No Further Action Date ___/___/___
Line Maint. Engineer: _____
Date ___/___/___

Final Review Action to be Taken
☐ Project Complete Date ___/___/___
☐ No Further Action Date ___/___/___
Comments: _____
Line Maint. Engineer: _____
Date ___/___/___

Agency	Verbal Notification	Written Notification
NMED	Date ___/___/___ ☐ AM ☐ PM Time ___:___	Date ___/___/___
USEPA	Date ___/___/___ ☐ AM ☐ PM Time ___:___	Date ___/___/___

Appendix E – Exhibit #4

W.O.# 10132663

City of Albuquerque
Public Works Department
Wastewater Utility Division
Collection System Condition Report

Control Card # 11084
Date Reported 1/24/10
Time Crew Notified 10:35 ☑ AM ☐ PM
Time Crew Arrived 1:20 ☐ AM ☑ PM
Foreman D. Montes

Name David Garcia (Property Owner or Reporter) Phone Number _____

Reported Location

From Manhole MAP#	From Manhole MH #	To Manhole MAP #	To Manhole MH #	Line Type	Line Dia.	Occupant Notified
6 1 9	8 9 2	6 1 9	8 6 4	CP	10	☑ Yes ☐ No

Address # 3821 **Street Name** Commercial **Street Type** ST **Quad** NE

Intersecting Street _____ & _____

☐ **40 Sewer Backup Comments:** _____ ☐ **cont. on back**

☑ **42 Manhole Overflow**

Time Of Spill 10:35 ☑ AM ☐ PM
Time Spill Was Stopped 1:45 ☐ AM ☑ PM
Duration of Spill ___ hrs. ___ mins.

Amount Spilled
☐ 1-50 gallons
☑ 51-100 gallons
☐ 101-500 gallons
☐ 501-1000 gallons
☐ over 1000 gallons

Where was Wastewater Spilled
☑ Yard
☐ Parking lot
☐ Street (Dirt)
☐ Street (Pavement)
☐ Storm Sewer
☐ Arroyo (Dirt)
☐ Arroyo (Concrete)
☑ Other Ground

What was done to Clean Area
☐ Removed Solids
☐ Removed Contaminated Soil
☐ Bermed Area to Contain spill
☐ Removed pool Wastewater
☐ Treated with Chlorine
Amount used ___ cups. ___ lbs.
☑ Other No Solids

☑ **48 Property Damage** **Risk Management # 768-3080** **After Hours Pager # 841-6941**

Claim Adjusters Name _____
Year of Home _____

List Damages Carpet, walls, Grout on tile

Yes	No	
☑	☐	Were Pictures Taken
☐	☑	Does Home Have Basement
☐	☑	Does Home Have Back Water Valve
☑	☐	Is Floor Elevation Below Upstream Manhole

Engineering Comments and / or Recommendations

1st Review Action to be Taken
☒ Clean 3 Segments upstream, 2 downstream Date 2/25/10
☐ Televise the line. Date ___/___/___
☐ Root Saw. Date ___/___/___
☐ Root Foam. Date ___/___/___
☐ Adjust PM Interval:

Freq. In weeks	Seq. #	Activity #
☐ 4 wks.		
☐ 12 wks.		
☐ 24 wks.		

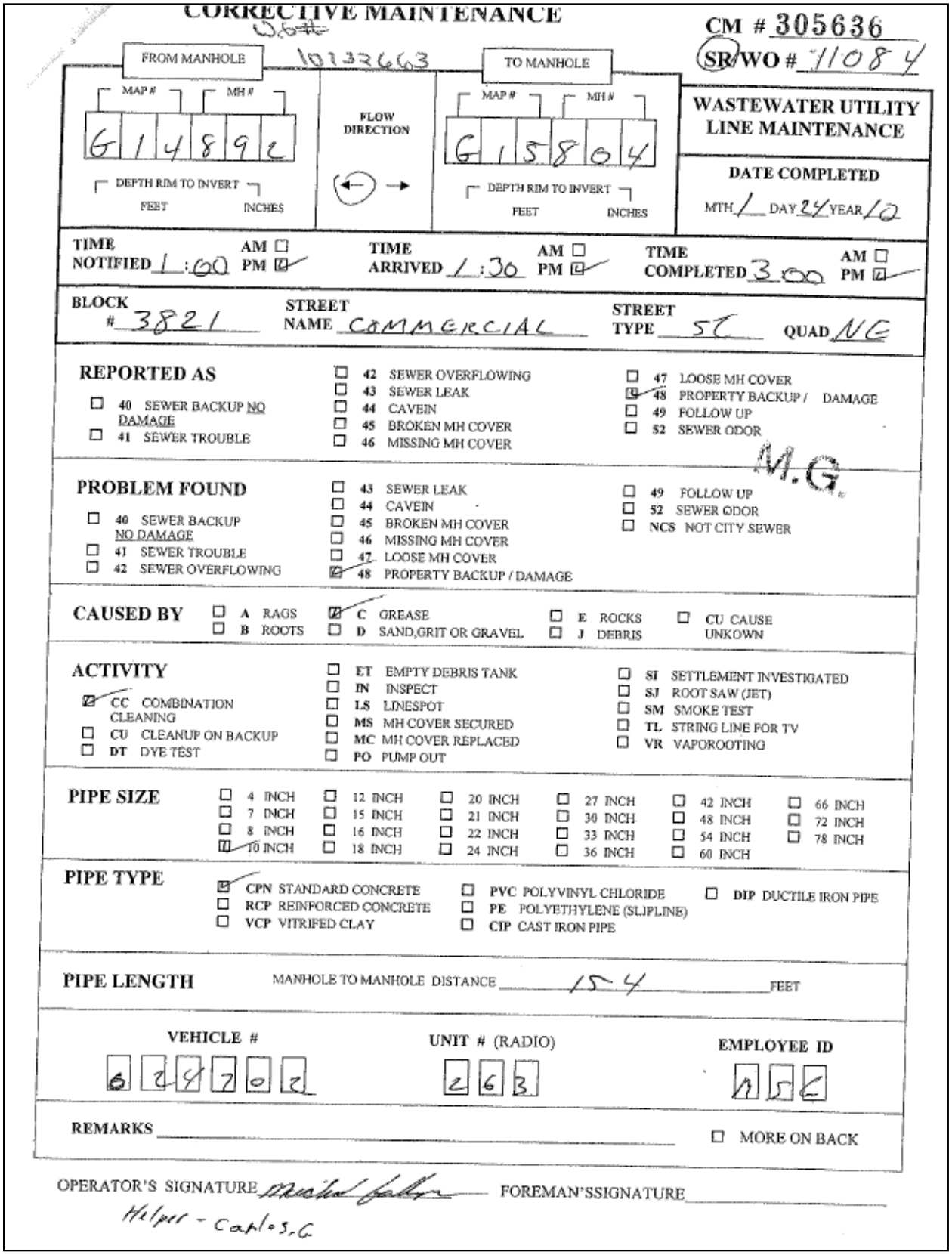
Date Set: ___/___/___ Int.: ____
☐ Notify Pretreatment Date ___/___/___
☐ No Further Action Date ___/___/___
Line Maint. Engineer: _____
Date 3/1/10

2nd Review Action to be Taken
☐ Root Saw Date ___/___/___
☐ Root Foam Date ___/___/___
☐ Point Repair Date ___/___/___
☐ Submit for Replacement Date ___/___/___
☐ No Further Action Date ___/___/___
Line Maint. Engineer: _____
Date ___/___/___

Final Review Action to be Taken
☐ Project Complete Date ___/___/___
☐ No Further Action Date ___/___/___
Comments: _____
Line Maint. Engineer: _____
Date ___/___/___

Agency	Verbal Notification	Written Notification
NMED	Date ___/___/___ Time ___:___ ☐ AM ☐ PM	Date ___/___/___
USEPA	Date ___/___/___ Time ___:___ ☐ AM ☐ PM	Date ___/___/___

Appendix E- Exhibit #4 (continued)



CORRECTIVE MAINTENANCE

CM # 305636

SR/WO # 71084

FROM MANHOLE 10132663 — MAP # G14892 — MH #

TO MANHOLE — MAP # G15864 — MH #

FLOW DIRECTION

DEPTH RIM TO INVERT — FEET — INCHES

WASTEWATER UTILITY LINE MAINTENANCE

DATE COMPLETED MTH 1 DAY 24 YEAR 12

TIME NOTIFIED 1:00 AM ☐ PM ☑

TIME ARRIVED 1:30 AM ☐ PM ☑

TIME COMPLETED 3:00 AM ☐ PM ☑

BLOCK # 3821 STREET NAME COMMERCIAL STREET TYPE ST QUAD NG

REPORTED AS

- ☐ 40 SEWER BACKUP NO DAMAGE
- ☐ 41 SEWER TROUBLE
- ☐ 42 SEWER OVERFLOWING
- ☐ 43 SEWER LEAK
- ☐ 44 CAVEIN
- ☐ 45 BROKEN MH COVER
- ☐ 46 MISSING MH COVER
- ☐ 47 LOOSE MH COVER
- ☑ 48 PROPERTY BACKUP / DAMAGE
- ☐ 49 FOLLOW UP
- ☐ 52 SEWER ODOR

M.G.

PROBLEM FOUND

- ☐ 40 SEWER BACKUP NO DAMAGE
- ☐ 41 SEWER TROUBLE
- ☐ 42 SEWER OVERFLOWING
- ☐ 43 SEWER LEAK
- ☐ 44 CAVEIN
- ☐ 45 BROKEN MH COVER
- ☐ 46 MISSING MH COVER
- ☐ 47 LOOSE MH COVER
- ☑ 48 PROPERTY BACKUP / DAMAGE
- ☐ 49 FOLLOW UP
- ☐ 52 SEWER ODOR
- ☐ NCS NOT CITY SEWER

CAUSED BY

- ☐ A RAGS
- ☐ B ROOTS
- ☑ C GREASE
- ☐ D SAND,GRIT OR GRAVEL
- ☐ E ROCKS
- ☐ J DEBRIS
- ☐ CU CAUSE UNKOWN

ACTIVITY

- ☑ CC COMBINATION CLEANING
- ☐ CU CLEANUP ON BACKUP
- ☐ DT DYE TEST
- ☐ ET EMPTY DEBRIS TANK
- ☐ IN INSPECT
- ☐ LS LINESPOT
- ☐ MS MH COVER SECURED
- ☐ MC MH COVER REPLACED
- ☐ PO PUMP OUT
- ☐ SI SETTLEMENT INVESTIGATED
- ☐ SJ ROOT SAW (JET)
- ☐ SM SMOKE TEST
- ☐ TL STRING LINE FOR TV
- ☐ VR VAPOROOTING

PIPE SIZE

- ☐ 4 INCH
- ☐ 7 INCH
- ☐ 8 INCH
- ☑ 10 INCH
- ☐ 12 INCH
- ☐ 15 INCH
- ☐ 16 INCH
- ☐ 18 INCH
- ☐ 20 INCH
- ☐ 21 INCH
- ☐ 22 INCH
- ☐ 24 INCH
- ☐ 27 INCH
- ☐ 30 INCH
- ☐ 33 INCH
- ☐ 36 INCH
- ☐ 42 INCH
- ☐ 48 INCH
- ☐ 54 INCH
- ☐ 60 INCH
- ☐ 66 INCH
- ☐ 72 INCH
- ☐ 78 INCH

PIPE TYPE

- ☑ CPN STANDARD CONCRETE
- ☐ RCP REINFORCED CONCRETE
- ☐ VCP VITRIFED CLAY
- ☐ PVC POLYVINYL CHLORIDE
- ☐ PE POLYETHYLENE (SLIPLINE)
- ☐ CIP CAST IRON PIPE
- ☐ DIP DUCTILE IRON PIPE

PIPE LENGTH MANHOLE TO MANHOLE DISTANCE 154 FEET

VEHICLE # 624702

UNIT # (RADIO) 263

EMPLOYEE ID 156

REMARKS ☐ MORE ON BACK

OPERATOR'S SIGNATURE [signature] FOREMAN'SSIGNATURE

Helper - Carlos, G

Appendix E – Exhibit #5

Albuquerque Bernalillo Co.
Water Utility Authority
Field Division/Collection Section
Condition Report

Control Card # 10109803
Date Reported 12/15/09
Time Crew Notified 3:00 ☐ AM ☑ PM
Time Crew Arrived 3:15 ☐ AM ☑ PM
Foreman G. Lucero

Name Robert Stevens (Property Owner or Reporter) Phone Number 266-5265

Reported Location

From Manhole MAP#	From Manhole MH #	To Manhole MAP #	To Manhole MH #	Line Type	Line Dia.	Occupant Notified
L17	115	L17	111	VCP	8"	☐ Yes ☐ No

Address # 615 Street Name Solano Street Type Dr Quad SE

Intersecting Street Solano & Pershing

☑ **40 Sewer Backup Comments:** _____ ☐ cont. on back

☐ **42 Manhole Overflow**

Time Of Spill ___:___ ☐ AM ☐ PM
Time Spill Was Stopped ___:___ ☐ AM ☐ PM
Duration of Spill ___hrs. ___mins.

Amount Spilled
☐ 1-50 gallons
☐ 51-100 gallons
☐ 101-500 gallons
☐ 501-1000 gallons
☐ over 1000 gallons

Where was Wastewater Spilled
☐ Yard
☐ Parking lot
☐ Street (Dirt)
☐ Street (Pavement)
☐ Storm Sewer
☐ Arroyo (Dirt)
☐ Arroyo (Concrete)
☐ Other _____

What was done to Clean Area
☐ Removed Solids
☐ Removed Contaminated Soil
☐ Bermed Area to Contain spill
☐ Removed pool Wastewater
☐ Treated with Chlorine
Amount used ___cups. ___lbs.
☐ Other _____

☐ **48 Property Damage** **Risk Management # 768-3080** **After Hours Pager # 841-6941**

Claim Adjusters Name _____
Year of Home _____

List Damages _____

Yes	No	
☐	☐	Were Pictures Taken
☐	☐	Does Home Have Basement
☐	☐	Does Home Have Back Water Valve
☐	☐	Is Floor Elevation Below Upstream Manhole

Engineering Comments and / or Recommendations

1st Review Action to be Taken
☑ Clean 1 Segments upstream, 2 downstream
Date 12/21/09 JH
☐ Televise the line. Date ___/___/___
☐ Root Saw. Date ___/___/___
☐ Root Foam. Date ___/___/___
☐ Adjust PM Interval:

Freq. In weeks	Seq. #	Activity #
☐ 4 wks.		
☐ 12 wks.		
☐ 24 wks.		

Date Set: ___/___/___ Int.: _____
☐ Notify Pretreatment Date ___/___/___
☐ No Further Action Date ___/___/___
Line Maint. Engineer: _____
Date 12/22/09

2nd Review Action to be Taken
☐ Root Saw Date ___/___/___
☐ Root Foam Date ___/___/___
☐ Point Repair Date ___/___/___
☐ Submit for Replacement Date ___/___/___
☐ No Further Action Date ___/___/___
Line Maint. Engineer: _____
Date ___/___/___

Final Review Action to be Taken
☐ Project Complete Date ___/___/___
☐ No Further Action Date ___/___/___
Comments: _____
Line Maint. Engineer: _____
Date ___/___/___

Agency	Verbal Notification	Written Notification
NMED	Date ___/___/___ Time ___:___ ☐ AM ☐ PM	Date ___/___/___
USEPA	Date ___/___/___ Time ___:___ ☐ AM ☐ PM	Date ___/___/___

Appendix E – Exhibit #6

Water Utility Authority

Albuquerque Bernalillo County Water Utility Authority
Field Division/Collection Section
Condition Report

SR# 41813
WO#
Date Reported 2/17/2012
Time Crew Notified 3 :25 ☐ AM ☑ PM
Time Crew Arrived 4 :20 ☐ AM ☑ PM
Supervisor Carlos Romero

Name Sun Port (Air Port) Phone Number
Property Owner or Reporter

Reported Location

From Manhole MAP#	From Manhole MH#	To Manhole MAP#	To Manhole MH#	Line Type	Line Dia.	Occupant Notified
M	15582	M	15581	PVC	8"	☐ Yes ☐ No

Address No. Street Name Sun Port Street Type Blvd Quad SE

Intersecting Street Yale Blvd &

☐ **40 Sewer Backup Comments:** ☐ cont. on back

☒ **42 Manhole Overflow – CS ☒ / ANR ☐**
Auth. City Sewer / Auth. Non-Reportable

Time Of Spill 3 25 ☐ AM ☑ PM
Time Spill Was Stopped 4 :30 ☐ AM ☑ PM
Duration of Spill ___ hrs. 55 mins.

Amount Spilled
☐ 1 --- 50
☑ 51 --- 100
☐ 101 --- 500
☐ 501 --- 1000
☐ Over --- 1000

Where was Wastewater Spilled
☐ Yard
☐ Parking lot
☐ Street (Dirt)
☐ Street (Pavement)
☑ Storm Sewer
☐ Arroyo (Dirt)
☐ Arroyo (Concrete)
☐ Other

What was done to Clean Area
☐ Removed Solids
☐ Removed Contaminated Soil
☐ Bermed Area to Contain
☐ Spill
☐ Removed Pool Wastewater
☑ Treated with Chlorine
Amount Used Cups lbs.
☐ Other

☐ **48 Property Damage – Risk Management**
#768 - 3080

List Damages

Claim Adjusters Name

Yes	No	
☐	☐	Were Pictures Taken
☐	☐	Does Home Have Basement
☐	☐	Does Home Have Back Water Valve
☐	☐	Is Floor Elevation Below Upstream Manhole

Engineering Comments and / or Recommendations

1st Review Action to be Taken
☑ Clean 1 Segments Upstream 1 Downstream
Date 3/12/12
☑ Televise The Line Date 3/14/2014
☐ Root Saw Date ___/___/___
☐ Root Foam Date ___/___/___
☐ Adjust PM Interval:

Freq. In weeks	Seq. #	Activity #
☐ 4 wks.		
☐ 12 wks.		
☐ 24 wks.		

Date Set: ___/___/___ Int.: ___
☐ Notify Pretreatment Date ___/___/___
☐ No Further Action Date ___/___/___
Line Maint. Engineer:
Date ___/___/___

2nd Review Action to be Taken
☐ Root Saw Date ___/___/___
☐ Root Foam Date ___/___/___
☐ Point Repair Date ___/___/___
☐ Submit for Replacement Date ___/___/___
☐ No Further Action Date ___/___/___
Line Maint. Engineer:
Date ___/___/___

Final Review Action to be Taken
☐ Project Complete Date ___/___/___
☐ No Further Action Date ___/___/___
Comments:
Line Maint. Engineer:
Date ___/___/___

Agency	Verbal Notification	Written Notification
NMED	Date 02/21/12 ☐ AM ☑ PM Time 1:27	Date ___/___/___
USEPA	Date 02/21/12 ☐ AM ☑ PM Time 1:29	Date ___/___/___

Appendix E – Exhibit #7

Water Utility Authority

Albuquerque Bernalillo County Water Utility Authority
Field Division/Collection Section
Condition Report

SR# 41823
WO#
Date Reported 2/19/2012
Time Crew Notified 4 : 56 ☐ AM ☑ PM
Time Crew Arrived 5 : 00 ☐ AM ☑ PM
Supervisor Carlos Romero

Name Terry Hatcher Phone Number 385-1606
Property Owner or Reporter

Reported Location

From Manhole MAP#	From Manhole MH #	To Manhole MAP #	To Manhole MH #	Line Type	Line Dia.	Occupant Notified
B13	32	B13	31	PVC	8"	☐ Yes ☐ No

Address No. 10323 Street Name Chandler Dr NW Street Type Dr Quad NW
Intersecting Street Bass Loop &

☐ **40 Sewer Backup Comments:** ☐ cont. on back

☒ **42 Manhole Overflow – CS ☑ / ANR ☐**
Auth. City Sewer / Auth. Non-Reportable

Time Of Spill 4:56 ☐ AM ☑ PM
Time Spill Was Stopped 5:30 ☐ AM ☑ PM
Duration of Spill 1 hrs. 30 mins.

Amount Spilled
☐ 1 --- 50
☑ 51 --- 100
☐ 101 --- 500
☐ 501 --- 1000
☐ Over --- 1000

Where was Wastewater Spilled
☐ Yard
☐ Parking lot
☐ Street (Dirt)
☐ Street (Pavement)
☐ Storm Sewer
☐ Arroyo (Dirt)
☑ Arroyo (Concrete)
☐ Other

What was done to Clean Area
☐ Removed Solids
☐ Removed Contaminated Soil
☐ Bermed Area to Contain
☐ Spill
☐ Removed Pool Wastewater
☑ Treated with Chlorine
Amount Used Cups lbs.
☐ Other Wash Road with Vactor Truck

☒ **48 Property Damage – Risk Management**
#768 - 3080
List Damages Water On Floor Of Basement Bathroom

Claim Adjusters Name

Yes	No	
☑	☐	Were Pictures Taken
☑	☐	Does Home Have Basement
☐	☑	Does Home Have Back Water Valve
☑	☐	Is Floor Elevation Below Upstream Manhole

Engineering Comments and / or Recommendations

1st Review Action to be Taken
☑ Clean 1 Segments Upstream 1 Downstream
Date 3/8/12
☑ Televise The Line Date 3/14/2012
☐ Root Saw Date ___/___/___
☐ Root Foam Date ___/___/___
☐ Adjust PM Interval:

Freq. In weeks	Seq. #	Activity #
☐ 4 wks.		
☐ 12 wks.		
☐ 24 wks.		

Date Set: ___/___/___ Int.: ___
☐ Notify Pretreatment Date ___/___/___
☐ No Further Action Date ___/___/___
Line Maint. Engineer: ___
Date ___/___/___

2nd Review Action to be Taken
☐ Root Saw Date ___/___/___
☐ Root Foam Date ___/___/___
☐ Point Repair Date ___/___/___
☐ Submit for Replacement Date ___/___/___
☐ No Further Action Date ___/___/___
Line Maint. Engineer: ___
Date ___/___/___

Final Review Action to be Taken
☐ Project Complete Date ___/___/___
☐ No Further Action Date ___/___/___
Comments: ___
Line Maint. Engineer: ___
Date ___/___/___

Agency	Verbal Notification	Written Notification
NMED	Date 02/21/12 ☐ AM ☑ PM Time 1:26	Date ___/___/___
USEPA	Date 02/21/12 ☐ AM ☑ PM Time 1:28	Date ___/___/___

Appendix E - Exhibit #8

Water Utility Authority

Albuquerque Bernalillo County Water Utility Authority
Field Division/Collection Section
Condition Report

SR# 44034
WO# 112227427
Date Reported 4/25/12
Time Crew Notified 7:00 ☐ AM ☒ PM
Time Crew Arrived 7:15 ☐ AM ☒ PM
Supervisor Henry Ortiz

Name _____ Phone Number _____
Property Owner or Reporter

Reported Location

From Manhole MAP#	From Manhole MH #	To Manhole MAP #	To Manhole MH #	Line Type	Line Dia.	Occupant Notified
J21511		J21510		RCP	21"	☒ Yes ☐ No

Address No. 1203 **Street Name** Mary Ellen **Street Type** St **Quad** NE

Intersecting Street &

☒ **40 Sewer Backup Comments:** (NCS) overflow caused by ☒ cont. on back

☒ **42 Manhole Overflow – CS** ☒ **/ ANR** ☐
Auth. City Sewer / Auth. Non-Reportable

Time Of Spill 7:00 ☐ AM ☒ PM
Time Spill Was Stopped 7:45 ☐ AM ☒ PM
Duration of Spill ____ hrs. 45 mins.

Amount Spilled
☐ 1 --- 50
☐ 51 --- 100
☐ 101 --- 500
☐ 501 --- 1000
☒ Over --- 1000

Where was Wastewater Spilled
☐ Yard
☐ Parking lot
☐ Street (Dirt)
☒ Street (Pavement)
☒ Storm Sewer
☐ Arroyo (Dirt)
☐ Arroyo (Concrete)
☐ Other _____

What was done to Clean Area
☒ Removed Solids
☐ Removed Contaminated Soil
☐ Bermed Area to Contain
☐ Spill
☒ Removed Pool Wastewater
☒ Treated with Chlorine
Amount Used 9 Cups __ lbs.
☒ Other Washed down

☐ **48 Property Damage – Risk Management**
#768 - 3080

List Damages _____

Claim Adjusters Name

Yes	No	
☐	☐	Were Pictures Taken
☐	☐	Does Home Have Basement
☐	☐	Does Home Have Back Water Valve
☐	☐	Is Floor Elevation Below Upstream Manhole

Engineering Comments and / or Recommendations

1st Review Action to be Taken
☐ Clean ___ Segments Upstream ___ Downstream
Date ___/___/___
☐ Televise The Line Date ___/___/___
☐ Root Saw Date ___/___/___
☐ Root Foam Date ___/___/___
☐ Adjust PM Interval:

Freq. In weeks	Seq. #	Activity #
☐ 4 wks.		
☐ 12 wks.		
☐ 24 wks.		

Date Set: ___/___/___ Int.: ____
☐ Notify Pretreatment Date ___/___/___
☒ No Further Action Date 04/26/12
Line Maint. Engineer: _____
Date ___/___/___

2nd Review Action to be Taken
☐ Root Saw Date ___/___/___
☐ Root Foam Date ___/___/___
☐ Point Repair Date ___/___/___
☐ Submit for Replacement Date ___/___/___
☐ No Further Action Date ___/___/___
Line Maint. Engineer: _____
Date ___/___/___

Final Review Action to be Taken
☐ Project Complete Date ___/___/___
☐ No Further Action Date ___/___/___
Comments: _____
Line Maint. Engineer: _____
Date ___/___/___

Agency	Verbal Notification	Written Notification
NMED	Date 04/26/12 ☒ AM ☐ PM Time 8:13	Date ___/___/___
USEPA	Date 04/26/12 ☒ AM ☐ PM Time 8:11	Date ___/___/___

Appendix E - Exhibit #8 (continued)

CORRECTIVE MAINTENANCE

CM # 304387

SR/WO # 44034

Alb. Bern. Co./ Water Utility Authority
Field Division / Collection Section

FROM MANHOLE — MAP # / MH #: Y 2 ~~0~~ 5 ~~0~~ ~~X~~ (corrected: 1, 1, 0)
DEPTH RIM TO INVERT — FEET / INCHES

FLOW DIRECTION: ← →

TO MANHOLE — MAP # / MH #: Y 2 1 5 1 1
DEPTH RIM TO INVERT — FEET / INCHES

DATE COMPLETED: MTH 4 DAY 25 YEAR 12

TIME NOTIFIED 6 : 55 AM ☐ PM ☒ | TIME ARRIVED 7 : 15 AM ☐ PM ☒ | TIME COMPLETED 9 : 10 AM ☐ PM ☒

BLOCK No. 1203 | STREET NAME Mary Ellen | STREET TYPE ST | QUAD NE

REPORTED AS
- ☐ 40 SEWER BACKUP NO DAMAGE
- ☐ 41 SEWER TROUBLE
- ☒ 42 SEWER OVERFLOWING
- ☐ 43 SEWER LEAK
- ☐ 44 CAVEIN
- ☐ 45 BROKEN MH COVER
- ☐ 46 MISSING MH COVER
- ☐ 47 LOOSE MH COVER
- ☐ 48 PROPERTY BACKUP / DAMAGE
- ☐ 49 FOLLOW UP
- ☐ 52 SEWER ODOR

PROBLEM FOUND
- ☐ 40 SEWER BACKUP NO DAMAGE
- ☐ 41 SEWER TROUBLE
- ☐ 42 SEWER OVERFLOWING

Amount Spilled
- ☐ 1 --- 50
- ☐ 51 --- 100
- ☐ 101 --- 500
- ☐ 501 --- 1000
- ☒ Over --- 1000

- ☐ 43 SEWER LEAK
- ☐ 44 CAVEIN
- ☐ 45 BROKEN MH COVER
- ☐ 46 MISSING MH COVER
- ☐ 47 LOOSE MH COVER
- ☐ 48 PROPERTY BACKUP / DAMAGE
- ☐ 49 FOLLOW UP
- ☐ 52 SEWER ODOR
- ☐ ANR AUTHORITY NON-REPORTABLE
- ☐ CS CITY SEWER
- ☒ NCS NON-CITY SEWER

CAUSED BY
- ☐ A RAGS
- ☐ B ROOTS
- ☐ C GREASE
- ☐ D SAND,GRIT OR GRAVEL
- ☐ E ROCKS
- ☐ J DEBRIS
- ☐ CU CAUSE UNKOWN

Caused By Plugs

ACTIVITY
- ☒ CC COMBINATION CLEANING
- ☐ CU CLEANUP ON BACKUP
- ☐ DT DYE TEST
- ☐ ET EMPTY DEBRIS TANK
- ☐ IN INSPECT
- ☐ LS LINESPOT
- ☐ MS MH COVER SECURED
- ☐ MC MH COVER REPLACED
- ☐ PO PUMP OUT
- ☐ SI SETTLEMENT INVESTIGATED
- ☐ SJ ROOT SAW (JET)
- ☐ SM SMOKE TEST
- ☐ TL STRING LINE FOR TV
- ☐ VR VAPOROOTING

PIPE SIZE
- ☐ 4 INCH ☐ 7 INCH ☐ 8 INCH ☐ 10 INCH
- ☐ 12 INCH ☐ 15 INCH ☐ 16 INCH ☐ 18 INCH
- ☐ 20 INCH ~~☒ 21 INCH~~ ☐ 22 INCH ☒ 24 INCH
- ☐ 27 INCH ☐ 30 INCH ☐ 33 INCH ☐ 36 INCH
- ☐ 42 INCH ☐ 48 INCH ☐ 54 INCH ☐ 60 INCH
- ☐ 66 INCH ☐ 72 INCH ☐ 78 INCH

PIPE TYPE
- ☐ CPN STANDARD CONCRETE
- ~~☒ RCP REINFORCED CONCRETE~~
- ☒ VCP VITRIFIED CLAY
- ☐ PVC POLYVINYL CHLORIDE
- ☐ PE POLYETHYLENE (SLIPLINE)
- ☐ CIP CAST IRON PIPE
- ☐ DIP DUCTILE IRON PIPE

PIPE LENGTH MANHOLE TO MANHOLE DISTANCE ~~485~~ 360 FEET

VEHICLE NO. 0 2 4 7 0 4 | UNIT # (RADIO) 2 1 2 216- 214- 213- | EMPLOYEE ID 13 5 1 5

REMARKS 10-42 NCS / OverFlow caused By AUI ☐ MORE ON BACK

OPERATOR'S SIGNATURE [signature] FOREMAN'S SIGNATURE Henry Ortiz

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APPENDIX F – January 1, 2012 through September 25, 2012 Call Log for SSOs Under 50 Gallons

Note: The following table was generated from the Authority's *Maximo* CMMS. Fields that are not essential to the finding have been removed for clarity.

Work Order	Address	Asset	Priority	Reported Date	Failure Class	Problem Code	Cause	10 Code	Amount Spilled
11191241	6027 SAN MATEO BLVD NE	269728	4	**1/18/12 6:19 AM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11191777	CONCHAS ST SE/COCHITI RD SE	317996	4	**1/19/12 7:34 AM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11192348	7212 MENAUL BLVD NE	271475	4	**1/20/12 9:36 PM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11196223	10233 LAS CASITAS ST NE	272552	4	**1/31/12 3:50 PM**	PIPE	OVERFLOW	ROOTS	10-42	1-50 GAL
11197270	8225 CENTRAL AVE NE	282692	4	**2/3/12 6:24 PM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11197808	10028 Central ave se	312452	4	**2/6/12 3:35 PM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11200557	2420 COMANCHE RD NE	266527	4	**2/14/12 6:02 AM**	PIPE	OVERFLOW	ROCKS	10-42	1-50 GAL
11200569	2000 FONNER DR SE	604253	4	**2/14/12 6:29 AM**	PIPE	OVERFLOW	RGSGRS	10-42	1-50 GAL
11200576	7507 TRAIL RIDGE RD NE	273206	4	**2/14/12 6:53 AM**	PIPE	OVERFLOW	RGSGRS	10-42	1-50 GAL
11202369	5615 DONNA MARLANE DR SW	255264	4	**2/18/12 4:00 PM**	PIT	BACKUP		10-42	1-50 GAL
11203763	4201 MONTANO RD NW	307290	5	**2/23/12 3:40 PM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11204016	10644 CAPRICORN PL NW	305244	4	**2/23/12 10:20 AM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11204309	4009 PITT ST NE	279604	4	**2/25/12 12:21 PM**	PIPE	OVERFLOW	ROOTS	10-42	1-50 GAL
11204471	SAN LORENZO & CHEROKEE RD NW	305820	5	**2/26/12 4:09 PM**	PIPE	OVERFLOW	RGSGRS	10-42	1-50 GAL
11206559	5555 MONTGOMERY BLVD NE	271936	4	**3/2/12 3:08 PM**	PIPE	OVERFLOW	RGSGRS	10-42	1-50 GAL
11207925	11504 SAN VICTORIO AVE NE	274824	4	**3/7/12 4:38 PM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11208320	7507 TRAIL RIDGE RD NE	273206	3	**3/8/12 3:54 PM**	PIPE	OVERFLOW	RTSGRS	10-42	1-50 GAL
11209075	3800 SHENANDOAH PL NE	273787	4	**3/12/12 10:01 PM**	PIPE	OVERFLOW	ROOTS	10-42	1-50 GAL
11209076	300 ALISO DR SE	285009	4	**3/12/12 10:18 PM**	PIPE	OVERFLOW	SDGT GRVL	10-42	1-50 GAL
11209598	CAGUA & MOUNTAIN NE	285985	4	**3/13/12 10:14 PM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11210109	7100 MENAUL BLVD NE	276669	4	**3/15/12 12:28 PM**	PIPE	OVERFLOW	ROOTS	10-42	1-50 GAL
11213616	11516 RIVIERA RD NE	273985	4	**3/23/12 3:44 PM**	PIPE	BACKUP	ROOTS	10-42	1-50 GAL
11219010	630 GENERAL HODGES SE	316713	4	**4/3/12 8:12 PM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11222651		300925	4	**4/12/12 6:24 AM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11225263	8801 SONYA AVE SW	292129	4	**4/20/12 6:07 AM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11227687	2427 Jensen Dr / Los Padilla Drain	298410	5	**4/26/12 8:36 AM**	PIPE	BROKLINE	WORN	10-42	1-50 GAL
11234445	VERANDA & HOYLE NE	267541	3	**5/9/12 3:58 PM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11236487	10500 4TH ST NW	319486	3	**5/15/12 12:59 PM**	PIT	OVERFLOW	UNKNOWN	10-42	1-50 GAL
11237871	13008 CLOUDVIEW AVE NE	314106	5	**5/18/12 3:43 PM**	PIPE	OVERFLOW	RAGS	10-42	1-50 GAL
11242217	4101 ROBERTA PL NE	271132	4	**5/30/12 8:35 AM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL
11250305	4805 DRIFTWOOD AVE NW	301463	5	**6/18/12 3:39 PM**	PIPE	OVERFLOW	ROOTS	10-42	1-50 GAL
11251363	2846 MOYA RD NW	311293	5	**6/19/12 3:33 PM**	PIPE	BACKUP	GREASE	10-42	1-50 GAL
11279960	5324 SAN MATEO BLVD NE	266023	4	**8/20/12 10:10 PM**	PIPE	OVERFLOW	GREASE	10-42	1-50 GAL

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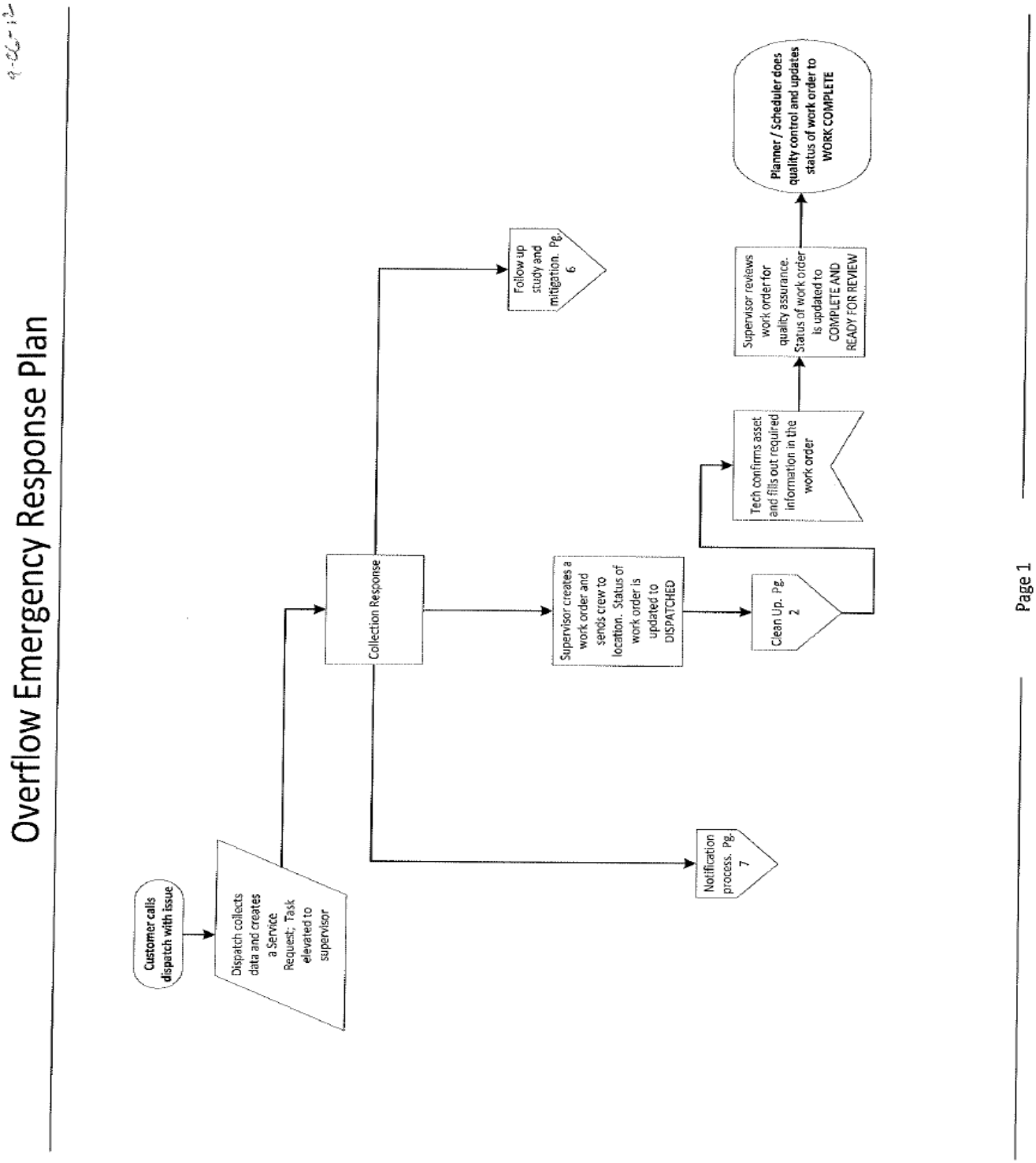
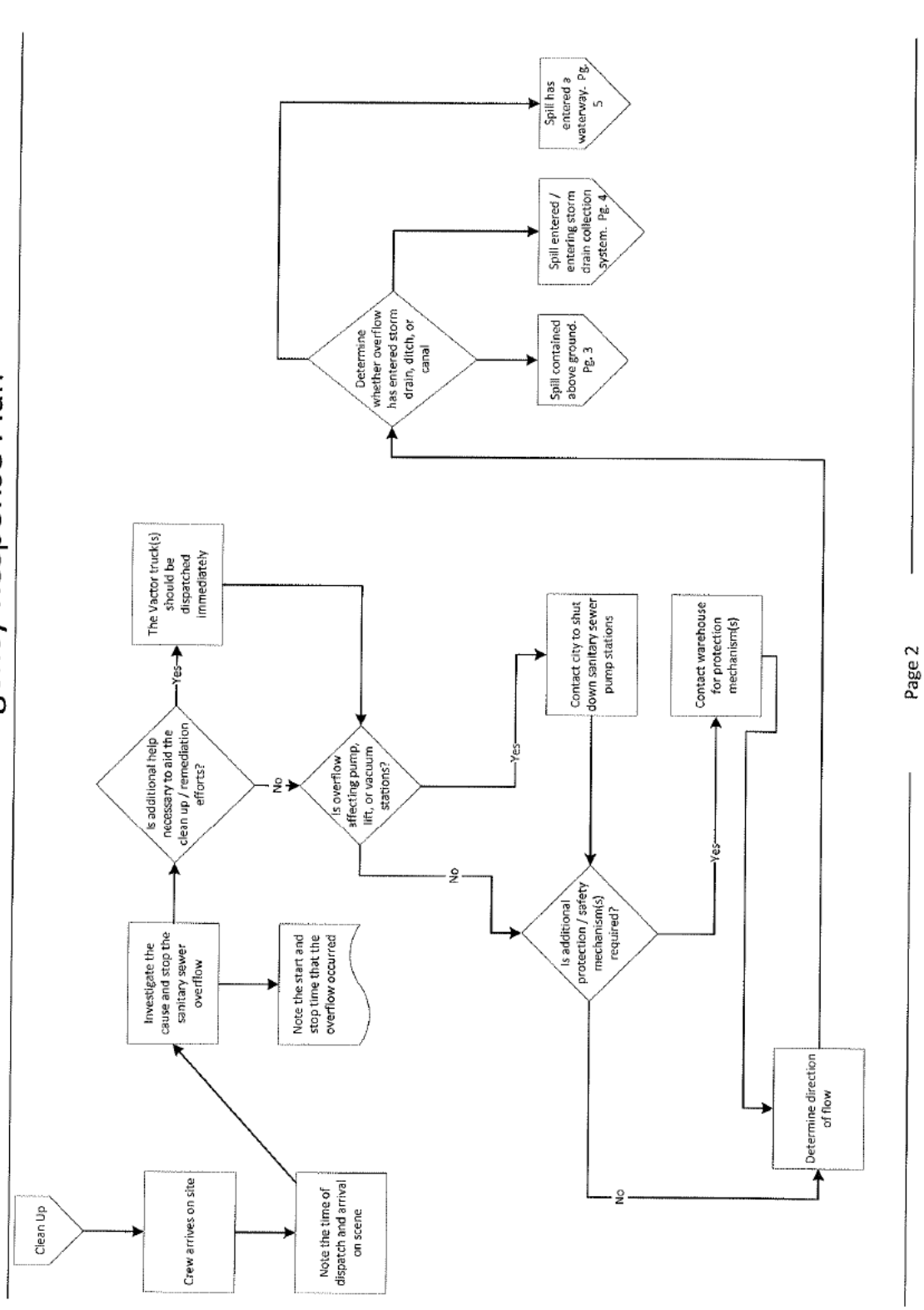
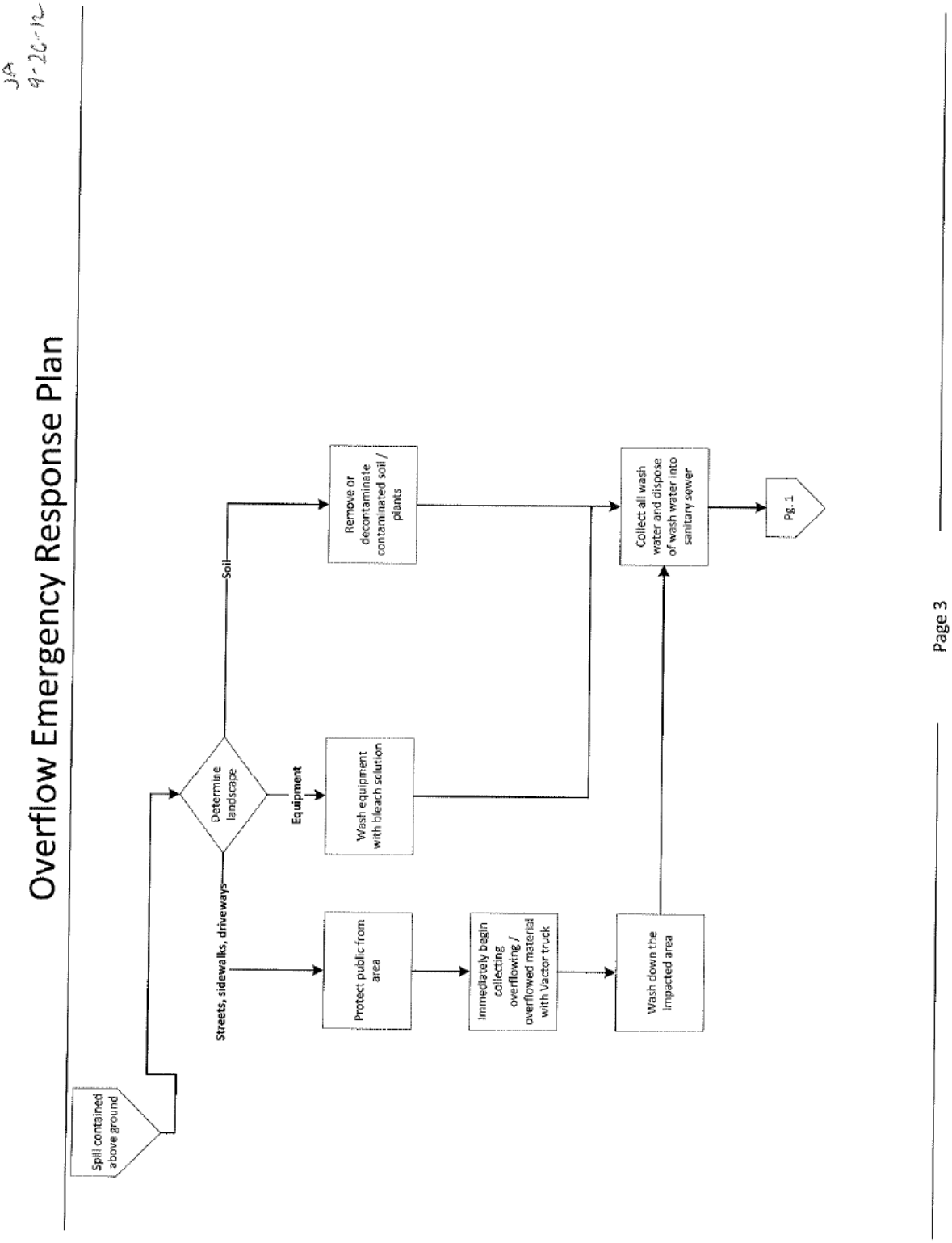
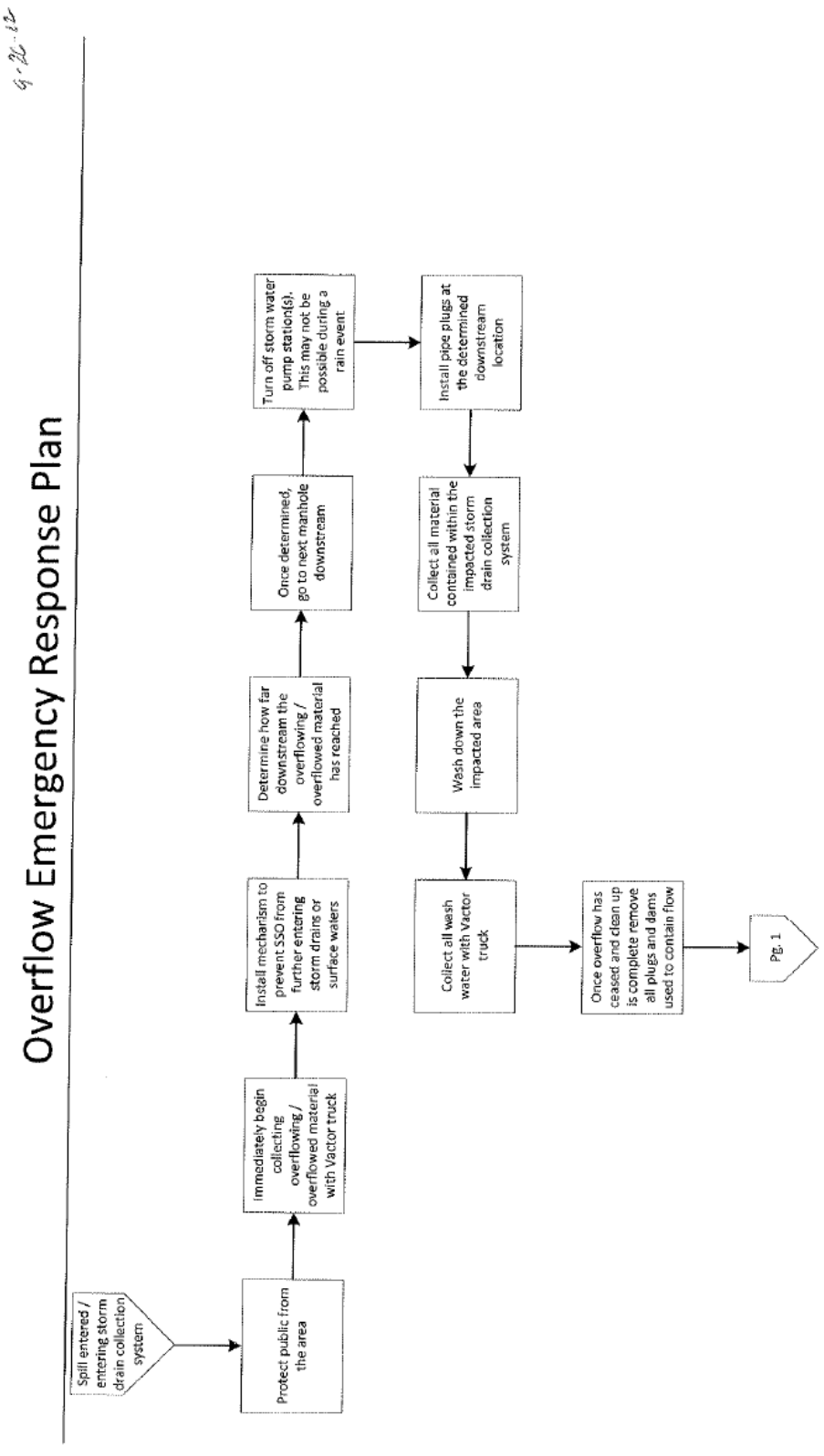
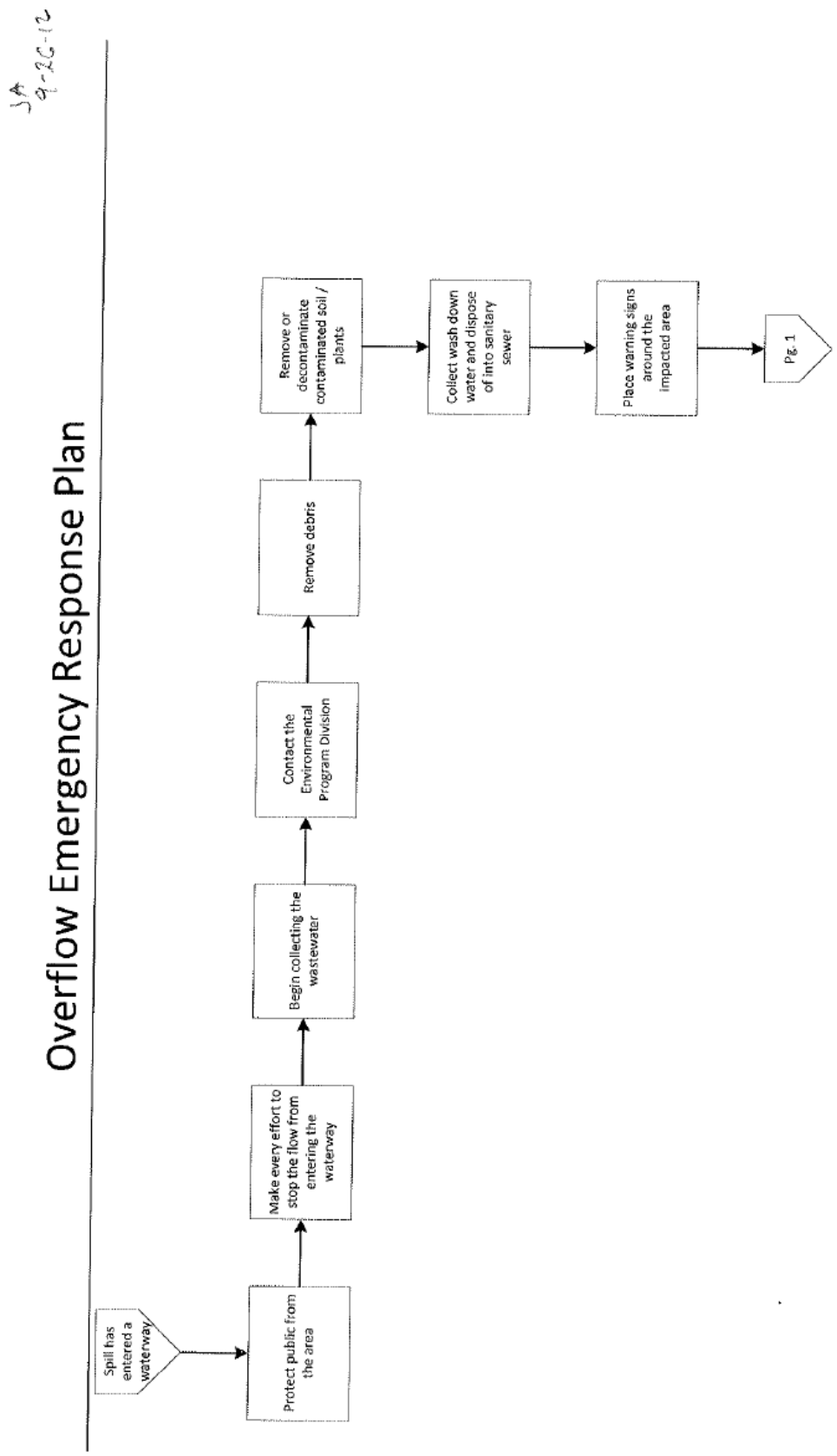
APPENDIX G - Overflow Emergency Response Plan Flow Charts




JA
4-26-12
Overflow Emergency Response Plan
Clean Up
Crew arrives on site
Note the time of dispatch and arrival on scene
Investigate the cause and stop the sanitary sewer overflow
Note the start and stop time that the overflow occurred
Is additional help necessary to aid the clean up / remediation efforts?
Yes
The Vactor truck(s) should be dispatched immediately
No
Is overflow affecting pump, lift, or vacuum stations?
Yes
Contact city to shut down sanitary sewer pump stations
No
Is additional protection / safety mechanism(s) required?
Yes
Contact warehouse for protection mechanism(s)
No
Determine direction of flow
Determine whether overflow has entered storm drain, ditch, or canal
Spill contained above ground. Pg. 3
Spill entered / entering storm drain collection system. Pg. 4
Spill has entered a waterway. Pg. 5
Page 2

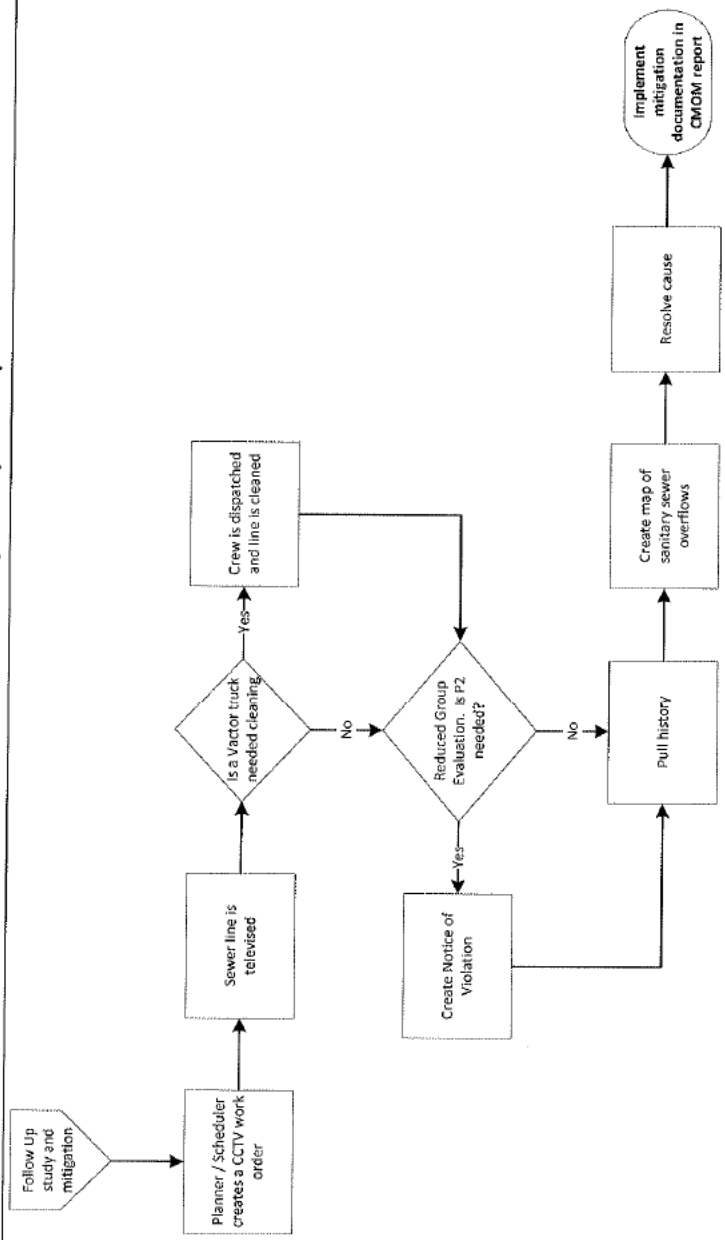

JA
9-26-12
Overflow Emergency Response Plan
Spill contained above ground
Determine landscape
Soil
Remove or decontaminate contaminated soil / plants
Equipment
Wash equipment with bleach solution
Streets, sidewalks, driveways
Protect public from area
Immediately begin collecting overflowing / overflowed material with Vactor truck
Wash down the impacted area
Collect all wash water and dispose of wash water into sanitary sewer
Pg. 1
Page 3


Overflow Emergency Response Plan
Spill entered / entering storm drain collection system
Protect public from the area
Immediately begin collecting overflowing / overflowed material with Vactor truck
Install mechanism to prevent SSO from further entering storm drains or surface waters
Determine how far downstream the overflowing / overflowed material has reached
Once determined, go to next manhole downstream
Turn off storm water pump station(s). This may not be possible during a rain event
Install pipe plugs at the determined downstream location
Collect all material contained within the impacted storm drain collection system
Wash down the impacted area
Collect all wash water with Vactor truck
Once overflow has ceased and clean up is complete remove all plugs and dams used to contain flow
Pg. 1
Page 4

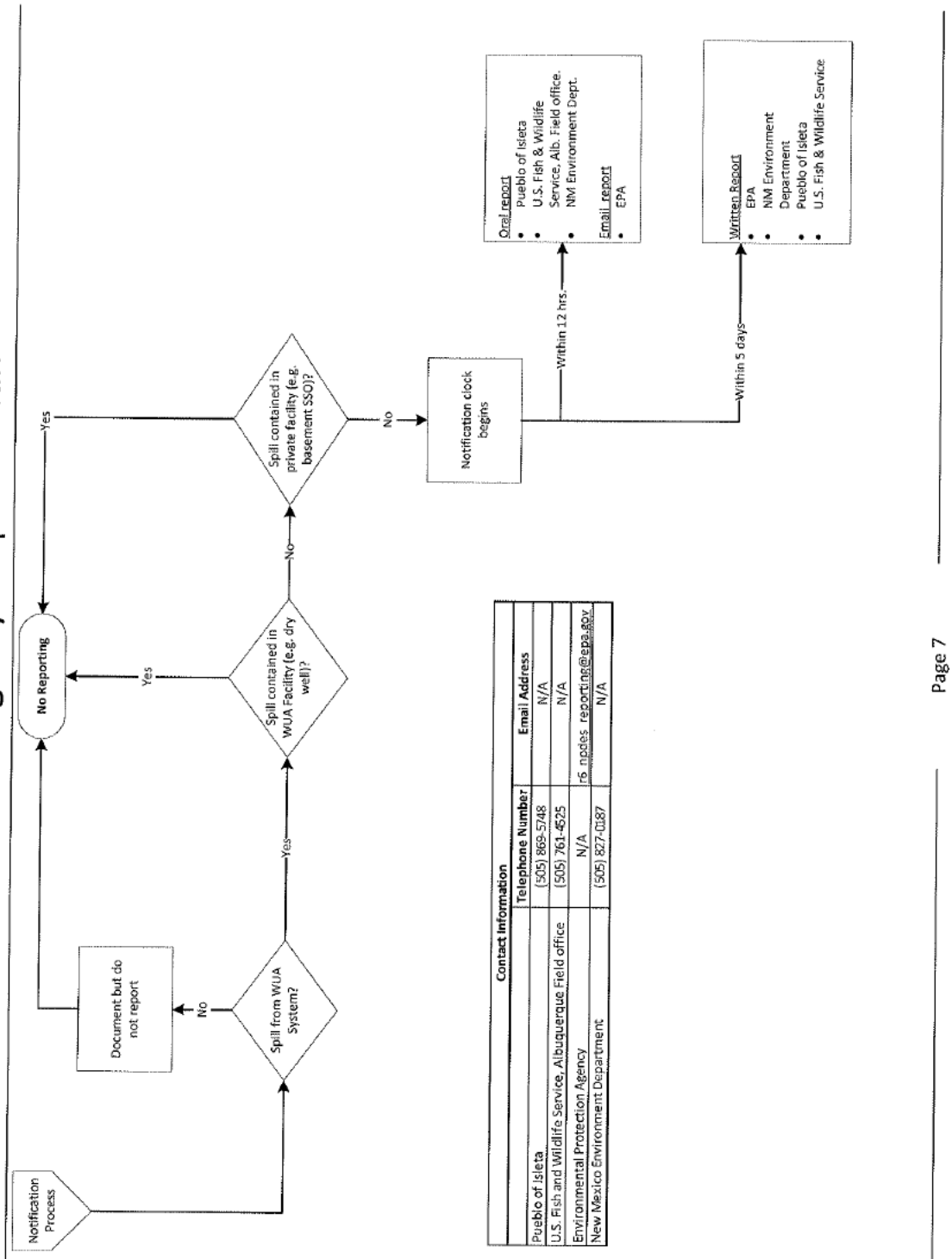

JA 9-26-12
Overflow Emergency Response Plan
Spill has entered a waterway
Protect public from the area
Make every effort to stop the flow from entering the waterway
Begin collecting the wastewater
Contact the Environmental Program Division
Remove debris
Remove or decontaminate contaminated soil / plants
Collect wash down water and dispose of into sanitary sewer
Place warning signs around the impacted area
Pg. 1
Page 5

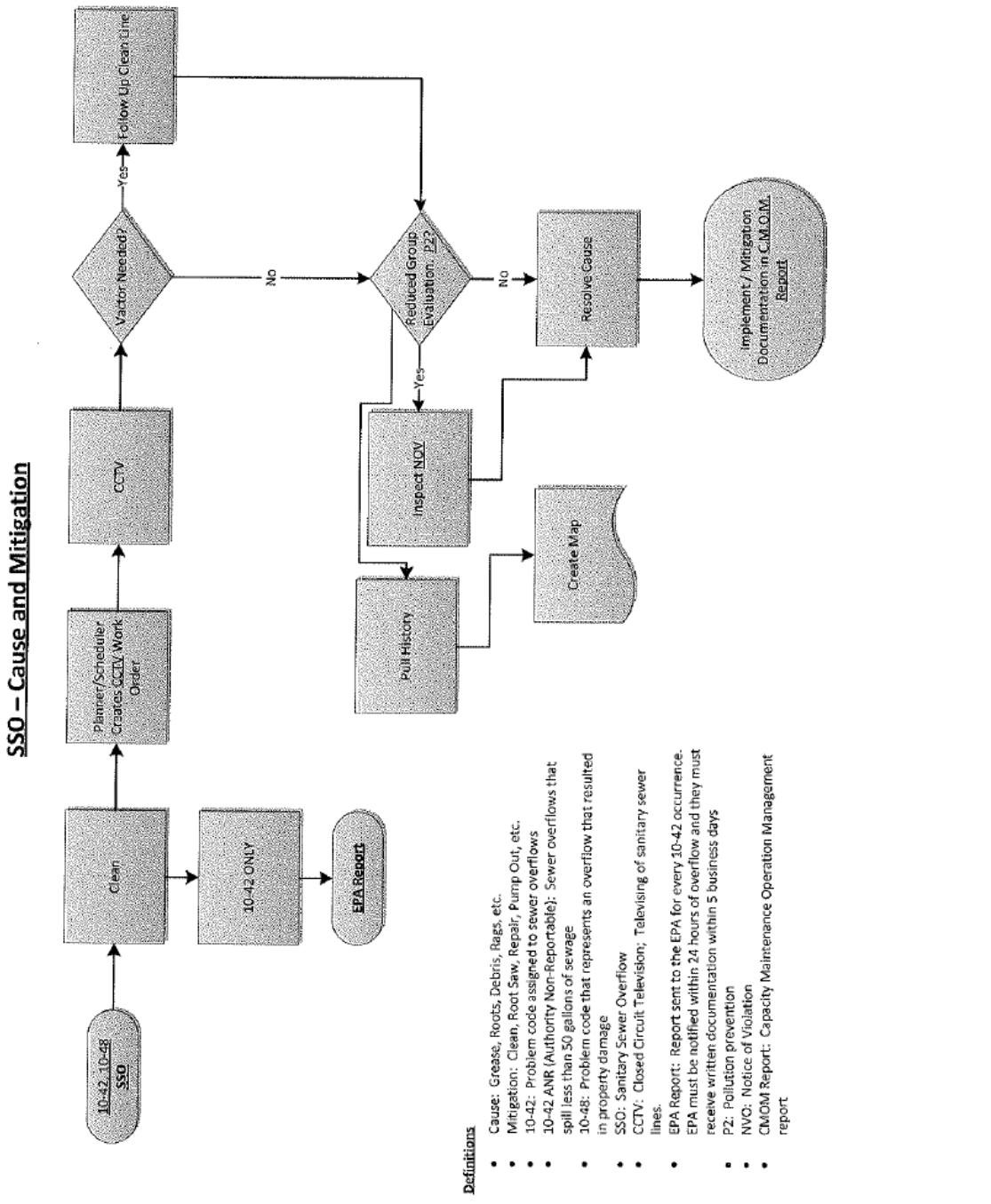
JA
9-26-12

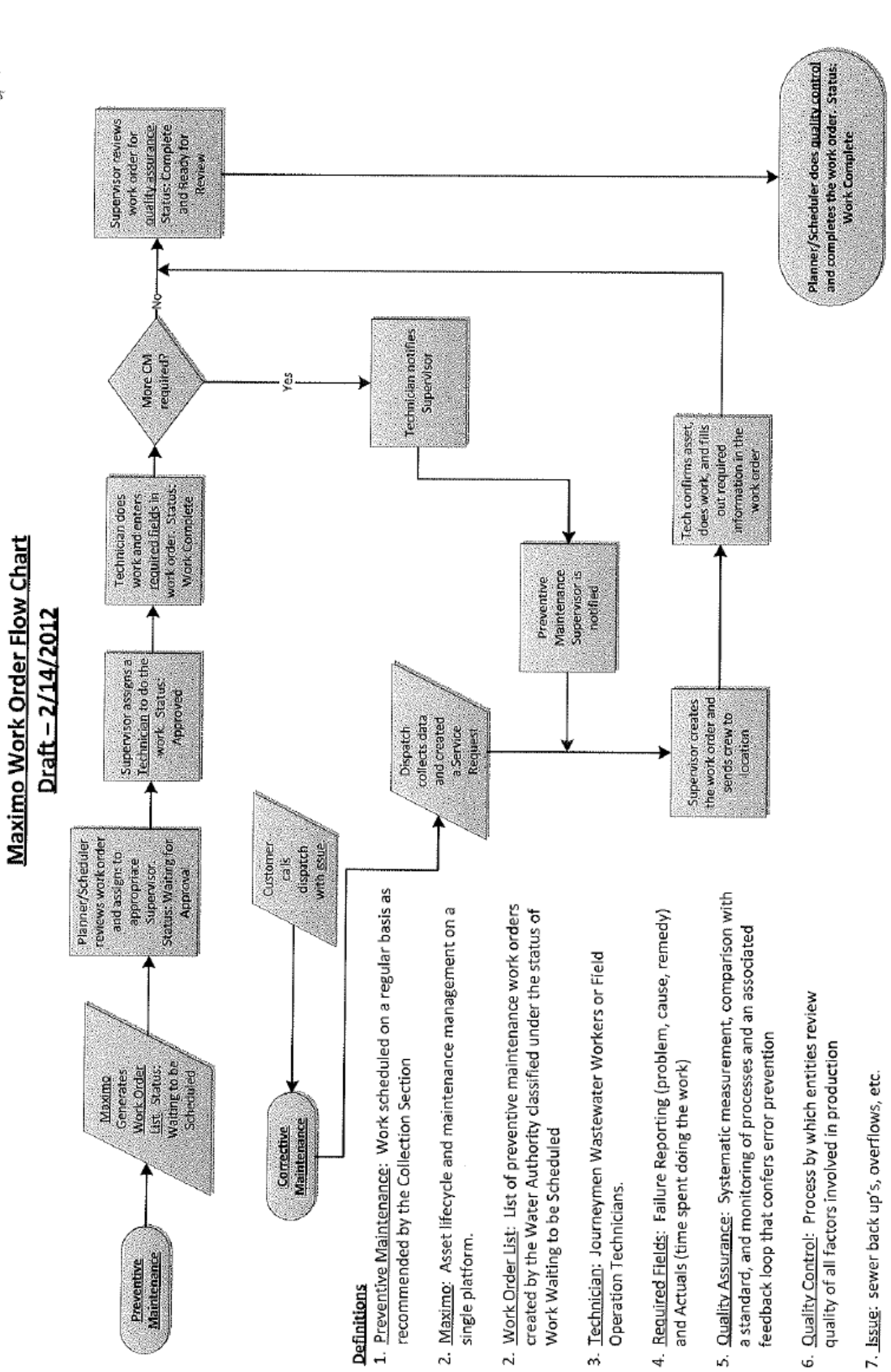
Overflow Emergency Response Plan

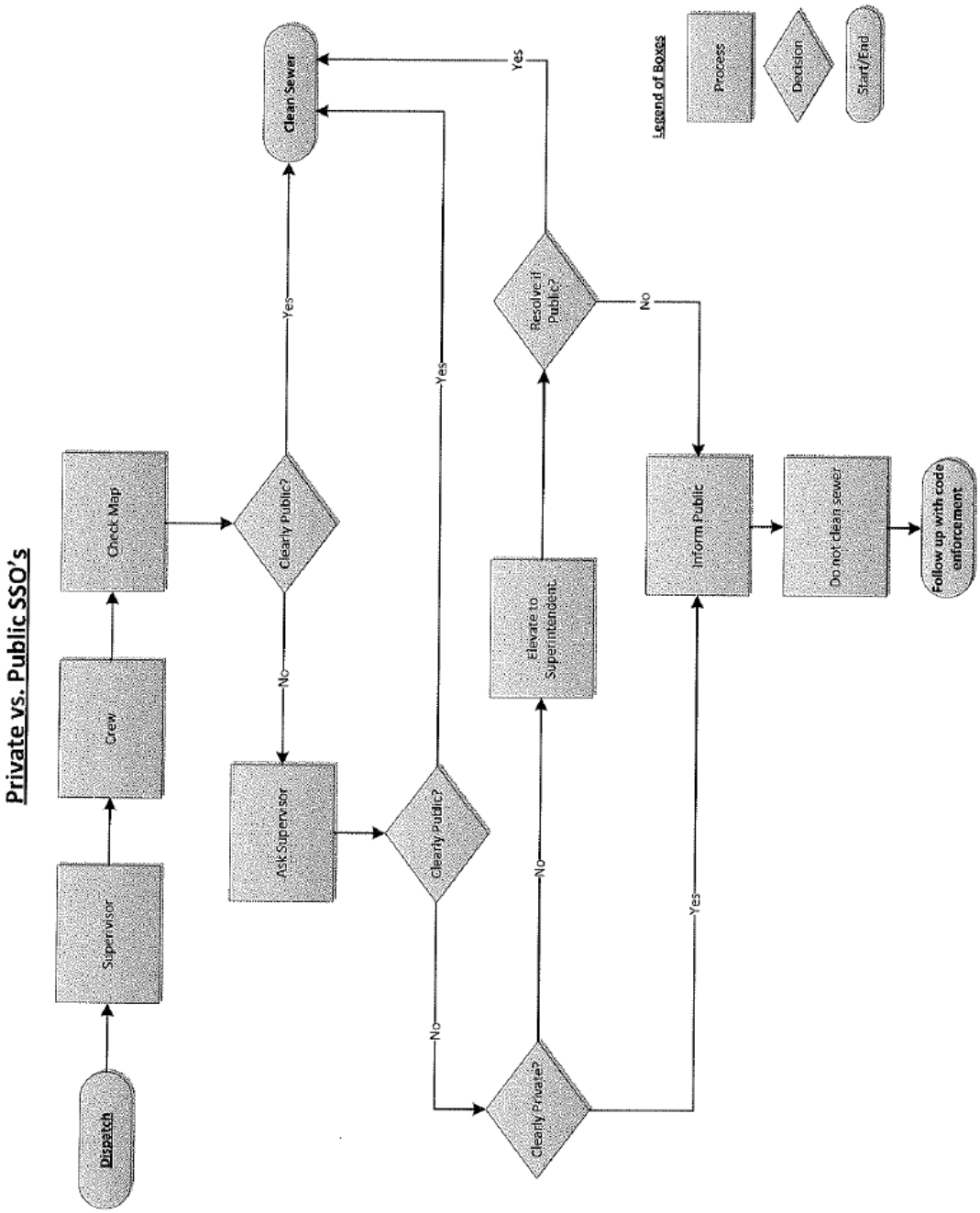


Page 6


Overflow Emergency Response Plan
9-26-12
Notification Process
Spill from WUA System?
No
Document but do not report
Yes
No Reporting
Yes
Spill contained in WUA Facility (e.g. dry well)?
No
Yes
Spill contained in private facility (e.g. basement SSO)?
No
Notification clock begins
Within 12 hrs.
Oral report
Pueblo of Isleta
U.S. Fish & Wildlife Service, Alb. Field office.
NM Environment Dept.
Email report
EPA
Within 5 days
Written Report
EPA
NM Environment Department
Pueblo of Isleta
U.S. Fish & Wildlife Service
Contact Information
Telephone Number
Email Address
Pueblo of Isleta (505) 869-5748 N/A
U.S. Fish and Wildlife Service, Albuquerque Field office (505) 761-4525 N/A
Environmental Protection Agency N/A r6_npdes_reporting@epa.gov
New Mexico Environment Department (505) 827-0187 N/A
Page 7


SSO – Cause and Mitigation
10-42, 10-48 SSO
Clean
10-42 ONLY
EPA Report
Planner/Scheduler Creates CCTV Work Order
CCTV
Vactor Needed?
Yes
Follow Up Clean Line
No
Reduced Group Evaluation P22
Yes
Inspect NOV
Pull History
Create Map
No
Resolve Cause
Implement / Mitigation Documentation in C.M.O.M. Report
Legend of Boxes
Process
Decision
Start/End
Document
Definitions
Cause: Grease, Roots, Debris, Rags, etc.
Mitigation: Clean, Root Saw, Repair, Pump Out, etc.
10-42: Problem code assigned to sewer overflows
10-42 ANR (Authority Non-Reportable): Sewer overflows that spill less than 50 gallons of sewage
10-48: Problem code that represents an overflow that resulted in property damage
SSO: Sanitary Sewer Overflow
CCTV: Closed Circuit Television; Televising of sanitary sewer lines.
EPA Report: Report sent to the EPA for every 10-42 occurrence. EPA must be notified within 24 hours of overflow and they must receive written documentation within 5 business days
P2: Pollution prevention
NVO: Notice of Violation
CMOM Report: Capacity Maintenance Operation Management report


Maximo Work Order Flow Chart
Draft – 2/14/2012
Preventive Maintenance
Maximo Generates Work Order List. Status: Waiting to be Scheduled
Planner/Scheduler reviews work order and assigns to appropriate Supervisor. Status: Waiting for Approval
Supervisor assigns a Technician to do the work. Status: Approved
Technician does work and enters required fields in work order. Status: Work Complete
More CM required?
Yes
No
Technician notifies Supervisor
Supervisor reviews work order for quality assurance. Status: Complete and Ready for Review
Planner/Scheduler does quality control and completes the work order. Status: Work Complete
Corrective Maintenance
Customer calls dispatch with issue
Dispatch collects data and created a Service Request
Preventive Maintenance Supervisor is notified
Supervisor creates the work order and sends crew to location
Tech confirms asset does work, and fills out required information in the work order
Definitions
1. Preventive Maintenance: Work scheduled on a regular basis as recommended by the Collection Section
2. Maximo: Asset lifecycle and maintenance management on a single platform.
2. Work Order List: List of preventive maintenance work orders created by the Water Authority classified under the status of Work Waiting to be Scheduled
3. Technician: Journeymen Wastewater Workers or Field Operation Technicians.
4. Required Fields: Failure Reporting (problem, cause, remedy) and Actuals (time spent doing the work)
5. Quality Assurance: Systematic measurement, comparison with a standard, and monitoring of processes and an associated feedback loop that confers error prevention
6. Quality Control: Process by which entities review quality of all factors involved in production
7. Issue: sewer back up's, overflows, etc.
8. Corrective Maintenance: maintenance addressing issues or defects brought to the Water Authorities attention by a customer or a wastewater worker


Private vs. Public SSO's
Dispatch
Supervisor
Crew
Check Map
Clearly Public?
Yes
No
Clean Sewer
Ask Supervisor
Clearly Public?
Yes
No
Clearly Private?
No
Elevate to Superintendent.
Resolve if Public?
Yes
No
Inform Public
Yes
Do not clean sewer
Follow up with code enforcement
Legend of Boxes
Process
Decision
Start/End

APPENDIX H - Spill Reports for April 14 &19, 2011 SSOs at Broadway Boulevard & Avenida Caesar Chavez

Albuquerque Bernalillo County
Water Utility Authority

Field Division
Collection System Section
4201 Second Street SW
Albuquerque, New Mexico 87105

April 15, 2011

Ms. Sonia Hall, Environmental Specialist
NPDES Compliance Section
US Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

SUBJECT: Docket No. VI-92-1129 · NPDES Permit No. NM 0022250

Dear Ms. Hall:

Enclosed is a copy of a sewer trouble report documenting a collection system manhole overflow. The overflow occurred on April 14, 2011 at 7:00 a.m.

EPA Hotline (answering service), US Environmental Protection Agency, received verbal notification on April 15, 2011 at 3:53 p.m.

Sandra Gabaldon, New Mexico Environment Department, received verbal notification on April 6, 2011 at 3:55 p.m.

If further information is needed, please call Yvonne Herrera, Adm. Senior Office Assistant, (505) 873-7006.

Sincerely,

Dr. James H. Olsen, P.E.
Manager, Field Division

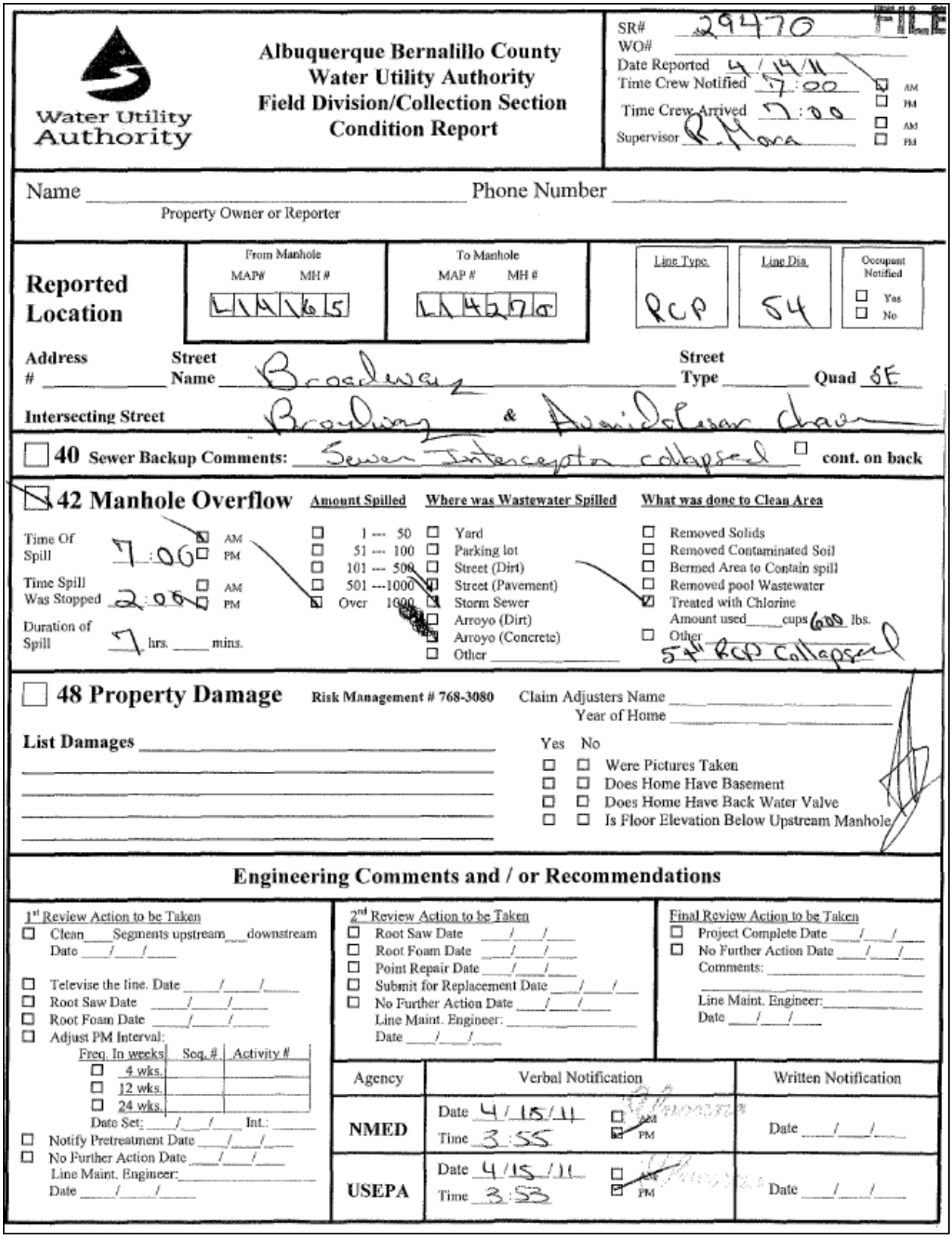
JHO:yeh

Enclosure

cc: Sandra Gabaldon, NM Env. Dept. Surface Water Quality Bureau
PO Box 5469, Santa Fe, New Mexico 87502
John M. Stomp III, P.E., Chief Operations Manager, Water Utility Authority
Mark Holstad, Collection System Manager, Field Division
Mark Gallegos, Collection System Asst. Superintendent, Field Division
Barbara Gastian, Compliance Manager, Compliance Division

Drive K LM LOverflowFEPA 4 14 2011 – Broadway Blvd. & Avenida Cesar Chavez SE

April 14, 2011 Report Page 1 of 3



Water Utility Authority

Albuquerque Bernalillo County Water Utility Authority
Field Division/Collection Section
Condition Report

SR# 29470 FILE
WO#
Date Reported 4/14/11
Time Crew Notified 7:00 ☑ AM ☐ PM
Time Crew Arrived 7:00 ☐ AM ☐ PM
Supervisor R. Mora

Name _____ Phone Number _____
Property Owner or Reporter

Reported Location

From Manhole MAP#	From Manhole MH #	To Manhole MAP #	To Manhole MH #	Line Type	Line Dia.	Occupant Notified
LA	16 5	LA	16 7	RCP	54	☐ Yes ☐ No

Address # _____ Street Name Broadway Street Type _____ Quad SE

Intersecting Street Broadway & Avenida Cesar Chavez

☐ **40 Sewer Backup Comments:** Sewer Intercepter collapsed ☐ cont. on back

☒ **42 Manhole Overflow**

Time Of Spill 7:00 ☒ AM ☐ PM
Time Spill Was Stopped 2:00 ☐ AM ☐ PM
Duration of Spill 7 hrs. ____ mins.

Amount Spilled
☐ 1 --- 50
☐ 51 --- 100
☐ 101 --- 500
☐ 501 ---1000
☒ Over 1000

Where was Wastewater Spilled
☐ Yard
☐ Parking lot
☐ Street (Dirt)
☐ Street (Pavement)
☒ Storm Sewer
☐ Arroyo (Dirt)
☒ Arroyo (Concrete)
☐ Other _____

What was done to Clean Area
☐ Removed Solids
☐ Removed Contaminated Soil
☐ Bermed Area to Contain spill
☐ Removed pool Wastewater
☒ Treated with Chlorine
Amount used ____ cups 600 lbs.
☐ Other 54" RCP Collapsed

☐ **48 Property Damage** Risk Management # 768-3080 Claim Adjusters Name _____
Year of Home _____

List Damages _____

Yes	No	
☐	☐	Were Pictures Taken
☐	☐	Does Home Have Basement
☐	☐	Does Home Have Back Water Valve
☐	☐	Is Floor Elevation Below Upstream Manhole

Engineering Comments and / or Recommendations

1st Review Action to be Taken
☐ Clean ____ Segments upstream ____ downstream
Date ____/____/____
☐ Televise the line. Date ____/____/____
☐ Root Saw Date ____/____/____
☐ Root Foam Date ____/____/____
☐ Adjust PM Interval:

Freq. In weeks	Seq. #	Activity #
☐ 4 wks.		
☐ 12 wks.		
☐ 24 wks.		

Date Set: ____/____/____ Int.: _____
☐ Notify Pretreatment Date ____/____/____
☐ No Further Action Date ____/____/____
Line Maint. Engineer: _____
Date ____/____/____

2nd Review Action to be Taken
☐ Root Saw Date ____/____/____
☐ Root Foam Date ____/____/____
☐ Point Repair Date ____/____/____
☐ Submit for Replacement Date ____/____/____
☐ No Further Action Date ____/____/____
Line Maint. Engineer: _____
Date ____/____/____

Final Review Action to be Taken
☐ Project Complete Date ____/____/____
☐ No Further Action Date ____/____/____
Comments: _____
Line Maint. Engineer: _____
Date ____/____/____

Agency	Verbal Notification	Written Notification
NMED	Date 4/15/11 ☐ AM ☒ PM Time 3:55	Date ____/____/____
USEPA	Date 4/15/11 ☐ AM ☒ PM Time 3:53	Date ____/____/____

April 14, 2011 Report Page 2 of 3

4/19/2011 15:19:11 WASTE WATER UTILITY LINE MAINTENANCE SECTION **SEGMENT HISTORY REPORT**

Page 1 of 1

Work Orders Activity for the Segment (L14165 - L14270)

Pipe Size: 54 - Pipe Length: 344 - Pipe Type: RCP - SI #: - SB#: 58 - Work Week: 0 - Pipe Liner:

Project #	Work Order #	Activity Description	Problem Found	Complete Date	Root Rating	Pipe Condition Rating
Work Order Type Code: TV						
411418	239781	TELEVISED LINE		02/19/2004	0	B - PIPE SLIGHT DEFECTS
99704	149387	TELEVISED LINE		11/06/1990	0	C - PIPE MODERATE DEFECTS

April 14, 2011 Report Page 3 of 3

Albuquerque Bernalillo County Water Utility Authority

Field Division
Collection System Section
4201 Second Street SW
Albuquerque, New Mexico 87105

April 20, 2011

Ms. Sonia Hall, Environmental Specialist
NPDES Compliance Section
US Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

SUBJECT: Docket No. VI-92-1129 - NPDES Permit No. NM 0022250

Dear Ms. Hall:

Enclosed is a copy of a sewer trouble report documenting a collection system manhole overflow. The overflow occurred on April 19, 2011 at 12:30 p.m.

EPA Hotline (answering service), US Environmental Protection Agency, received verbal notification on April 20, 2011 at 5:10 p.m.

Sandra Gabaldon, New Mexico Environment Department, received verbal notification on April 20, 2011 at 5:12 p.m.

If further information is needed, please call Yvonne Herrera, Adm. Senior Office Assistant, (505) 873-7006.

Sincerely,

Dr. James H. Olsen, P.E.
Manager, Field Division

JHO:yeh

Enclosure

cc: Sandra Gabaldon, NM Env. Dept. Surface Water Quality Bureau
PO Box 5469, Santa Fe, New Mexico 87502
John M. Stomp III, P.E., Chief Operations Manager, Water Utility Authority
Mark Holstad, Collection System Manager, Field Division
Mark Gallegos, Collection System Asst. Superintendent, Field Division
Barbara Gastian, Compliance Manager, Compliance Division

Drive K LM LOverflowFEPA 4 19 2011 – Broadway Blvd. & Avenida Cesar Chavez Street SE-2nd

April 19, 2011 Report Page 1 of 3

Water Utility Authority

Albuquerque Bernalillo County
Water Utility Authority
Field Division/Collection Section
Condition Report

SR# 29713
WO#
Date Reported 4/19/11 FILE
Time Crew Notified 12:30 ☐ AM ☑ PM
Time Crew Arrived 12:45 ☐ AM ☑ PM
Supervisor R. Mora

Name ____ Property Owner or Reporter
Phone Number ____

Reported Location

From Manhole MAP#	MH #	To Manhole MAP #	MH #	Line Type	Line Dia.	Occupant Notified
L14	165	L14	270	RCP	54	☐ Yes ☐ No

Address # ____ **Street Name** Broadway & Avenida Cesar Chavez **Street Type** St **Quad** SE

Intersecting Street &

☐ **40 Sewer Backup Comments:** 2nd Collapse of the SDI Interceptor cont. on back

☒ **42 Manhole Overflow**

Time Of Spill 1230 ☐ AM ☑ PM
Time Spill Was Stopped 3:00 ☑ AM ☐ PM
Duration of Spill 14 hrs. ____ mins.

Amount Spilled
- ☐ 1 --- 50
- ☐ 51 --- 100
- ☐ 101 --- 500
- ☐ 501 --- 1000
- ☑ Over 1000

Where was Wastewater Spilled
- ☐ Yard
- ☐ Parking lot
- ☐ Street (Dirt)
- ☐ Street (Pavement)
- ☒ Storm Sewer
- ☐ Arroyo (Dirt)
- ☐ Arroyo (Concrete)
- ☐ Other ____

What was done to Clean Area
- ☐ Removed Solids
- ☐ Removed Contaminated Soil
- ☐ Bermed Area to Contain spill
- ☐ Removed pool Wastewater
- ☒ Treated with Chlorine
- Amount used ____ cups ____ lbs.
- ☐ Other 600 to 1000 HTH lbs

☐ **48 Property Damage** **Risk Management # 768-3080**

Claim Adjusters Name ____
Year of Home ____

List Damages ____

Yes	No	
☐	☐	Were Pictures Taken
☐	☐	Does Home Have Basement
☐	☐	Does Home Have Back Water Valve
☐	☐	Is Floor Elevation Below Upstream Manhole

Engineering Comments and / or Recommendations

1st Review Action to be Taken
- ☐ Clean ___ Segments upstream ___ downstream Date ___/___/___
- ☐ Televise the line. Date ___/___/___
- ☐ Root Saw Date ___/___/___
- ☐ Root Foam Date ___/___/___
- ☐ Adjust PM Interval:

Freq. In weeks	Seq. #	Activity #
☐ 4 wks.		
☐ 12 wks.		
☐ 24 wks.		

Date Set: ___/___/___ Int.: ___
- ☐ Notify Pretreatment Date ___/___/___
- ☐ No Further Action Date ___/___/___

Line Maint. Engineer: ____
Date ___/___/___

2nd Review Action to be Taken
- ☐ Root Saw Date ___/___/___
- ☐ Root Foam Date ___/___/___
- ☐ Point Repair Date ___/___/___
- ☐ Submit for Replacement Date ___/___/___
- ☐ No Further Action Date ___/___/___

Line Maint. Engineer: ____
Date ___/___/___

Final Review Action to be Taken
- ☐ Project Complete Date ___/___/___
- ☐ No Further Action Date ___/___/___

Comments: ____
Line Maint. Engineer: ____
Date ___/___/___

Agency	Verbal Notification	Written Notification
NMED	Date 4/20/11 Time 5:10 ☐ AM ☑ PM	Date ___/___/___
USEPA	Date 4/20/11 Time 5:12 ☐ AM ☑ PM	Date ___/___/___

April 19, 2011 Report Page 2 of 3

4/25/2011 10:18:32 WASTE WATER UTILITY LINE MAINTENANCE SECTION

Page 1 of 1

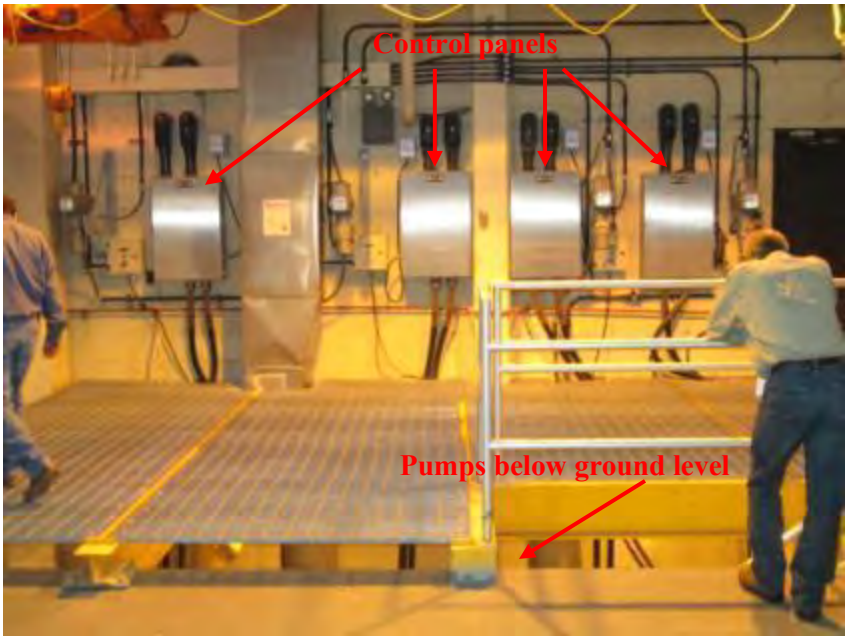
SEGMENT HISTORY REPORT

Work Orders Activity for the Segment (L14166 - L14270)

Pipe Size: 54 - Pipe Length: 344 - Pipe Type: RCP - SI #: - SB#: 58 - Work Week: 0 - Pipe Liner:

Project #	Work Order #	Activity Description	Problem Found	Complete Date	Root Rating	Pipe Condition Rating
Work Order Type Code: TV						
411418	239781	TELEVISED LINE		02/19/2004	0	B - PIPE SLIGHT DEFECTS
99704	149387	TELEVISED LINE		11/06/1990	0	C - PIPE MODERATE DEFECTS

APPENDIX I - Photograph Log



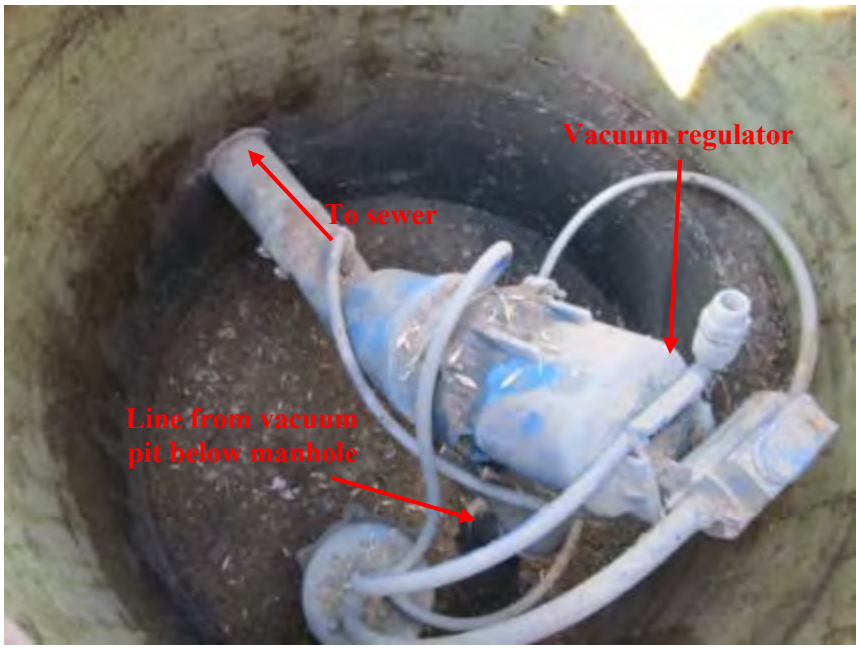
Photograph 1. **Pump Station No. 20 – View of control panels for the four primary pumps. The actual pumps were several floors below ground level.**

Photograph 2. **Pump Station No. 20 – View of backup generator. Authority staff stated that the pump station also has two separate electrical feeds from the local utility, Public Service Company of New Mexico (PNM).**

Photograph 3. Pump Station No. 20 – View of the pump station's biofilter for odor control.

Photograph 4. Pump Station No. 20 – View of the second pump building, which primarily serves as backup capacity, at Pump Station No. 20.

Photograph 5. **Vacuum Station Nos. 61 & 64 – View of a vacuum pump inside the building that houses Vacuum Station Nos. 61 & 64.**



Photograph 6. **Vacuum Station Nos. 61 & 64 – View inside a vacuum pit manhole. The regulator turns the pump on when the pit contains approximately 10 gallons.**

Photograph 7. **Sewer System Short Interval Cleaning Crew – View of one of the Authority's vactor trucks. In this case it was being used for short interval step cleaning.**

Photograph 8. **Sewer System Short Interval Cleaning Crew – View of one of the Authority's vactor trucks. In this case it was being used for short interval step cleaning.**

Photograph 9. **Roseberry Road & Blumenshine Circle – View of the vicinity of the Roseberry Road & Blumenshine Circle SSOs. Note that there is a second manhole hidden by vegetation in the background. Both of these manholes overflowed during the SSO events.**

Photograph 10. **Roseberry Road & Blumenshine Circle – View of the new 48-inch flow control valve installed downstream of the Roseberry Road & Blumenshine manholes.**

Photograph 11. **Broadway Boulevard SE & Avenida Caesar Chavez SE SSOs – *Google Earth* view of the vicinity of the SSOs. Note that locations are approximate.**

Photograph 12. **Broadway Boulevard SE & Avenida Caesar Chavez SE SSOs – Street view of the vicinity of the interceptor collapses. The closest storm drain was located approximately 15 feet from the collapse area. Note that construction activity unrelated to the SSO was happening in the vicinity.**

Photograph 13. **Broadway Boulevard SE & Avenida Caesar Chavez SE SSOs – View of the stormwater detention pond used for containment of the SSOs.**

Photograph 14. **Broadway Boulevard SE & Avenida Caesar Chavez SE SSOs – View of the storm sewer pump station wet well where the SSO was contained.**

Authority staff present at the inspection were unsure of the well's capacity.

Photograph 15. Mary Ellen Street NE Construction – View of the new 24-inch air jumper line to be connected in the 1200 block of Mary Ellen Street NE.

Appendix 7 Response to Sanitary Sewer Compliance Inspection Report

Albuquerque Bernalillo County
Water Utility Authority

PO Box 568
Albuquerque, NM 87103
505-289-3000
www.abcwua.org

January 13, 2015

Mr. Robert Houston
Water Enforcement Branch (6EN-WM)
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Via USPS Priority Mail: Signature Confirmation Receipt

Subject: Response Regarding Meeting With EPA of October 30, 2014

Dear Mr. Houston:

The Albuquerque Bernalillo County Water Utility Authority (Water Authority) would like to thank you for meeting with us at your offices in Dallas on October 30, 2014. As a result of the discussions during the meeting, the Water Authority committed to provide additional information by January 15, 2015. Details of the information requested are provided below.

1. **An updated Corrective Action Plan and Construction Schedule:**
   The Corrective Action Plan (CAP) that was provided in May 2014 has been updated for the improvements to the Southside Water Reclamation Plant (SWRP). The update includes both the written plan and the Gaant Chart detailing construction activities (see Attachment A).

2. **Response to January 28, 2013 Sanitary Sewer Compliance Inspection Report:**
   Attachment B contains the Water Authority's response to the Inspection Report dated January 28, 2013 for the Sanitary Sewer Compliance Inspection conducted September 25 and 26, 2012.

3. **Submittal of Revised Discharge Monitoring Reports:**
   Thank you for providing the Water Authority with the contact information for Mr. Tung Nguyen, who was able to modify the National Pollutant Discharge Elimination System permit to correct the mass loading limits for $CBOD_5$ and Total Inorganic Nitrogen. The amended DMRs were submitted on December 19, 2014 and received by EPA on December 22, 2014.

4. **Confirmation of the Change to Ultraviolet (UV) Disinfection:**
   The Water Authority notified the EPA in a letter dated March 2, 2011 that the SWRP would be converting from chlorine to UV disinfection in April 2011. This letter is included as Attachment C. In the Response to the Administrative Order CWA-06-2011-1777, dated July 6, 2011, the Water Authority confirmed that the UV disinfection facility started operations on April 13, 2011. The pertinent pages of the response are included as Attachment D.

5. **Certified Thermometers in Samplers:**
   The inspection report for the SWRP inspection conducted August 6 and 7, 2014 noted that certified thermometers were not being used in automated samplers as an area of concern. The Water Authority immediately ordered NIST certified thermometers and started using them in October 2014. Attachment E contains the thermometer calibration certificates.

Please contact me at (505) 289-3150 or jstomp@abcwua.org if you have any questions or need additional information.

Sincerely,

John M. Stomp III, P.E.
Chief Operating Officer

cc: Ms. Gladys Gooden-Jackson, EPA Region 6

Attachments:

A. January 2015 CAP Update
B. Response to Sanitary Sewer Inspection Report
C. UV Disinfection Letter, March 2, 2011
D. Excerpt of Response to the Administrative Order CWA-06-2011-1777, July 6, 2011
E. Thermometer Calibration Certificates

Attachment B

Response to Sanitary Sewer Inspection Report

Albuquerque Bernalillo County Water Utility Authority

Response to Sanitary Sewer Compliance Inspection Report

Report Date: January 28, 2013

Inspection Conducted: September 25-26, 2012

The Sanitary Sewer Compliance Inspection occurred on September 25-26, 2012 and the Water Authority was briefed on the preliminary findings at an exit briefing on September 26, 2012. The current National Pollutant Discharge Elimination System (NPDES) Permit became effective shortly thereafter, on October 1, 2012. Based on the preliminary findings of the inspection and the new Capacity, Management, Operation, and Maintenance (CMOM) Permit requirement, the Water Authority developed a Corrective Action Plan (November 2012 CAP) that was submitted to the EPA on November 19, 2012 and a CMOM Report (FY2013 CMOM) submitted to EPA on September 27, 2013. While not required by the NPDES Permit, a second CMOM report (FY2014 CMOM) dated September 26, 2014 was posted to the Water Authority website for public review.

The Water Authority did not receive the Inspection Report until October 30, 2014. As promised in the meeting with Robert Houston at the EPA Region VI office on October 30, 2014, the Water Authority has prepared the following responses to the Inspection Report's findings and areas of concern.

Findings:

A. Finding 1. Part III., SECTION B. Provision 2. DUTY TO MITIGATE and Provision 4.c PROHIBITION OF BYPASS and NMAC 20.6.2.2201 – DISPOSAL OF REFUSE

The EPA Inspection Team reviewed prohibited discharges reported to EPA by the Authority and found that 101 prohibited discharges (i.e., SSOs) had been reported to EPA during the period of January 15, 2010 to August 1, 2012. Refer to Appendix D for the list of these reported SSOs. It should be noted that the Authority was found not to be reporting SSOs with volumes estimated to be 50 gallons or less.

Response:

The Water Authority acknowledges that prohibited discharges have occurred and that all discharges from the sanitary sewer system are prohibited. These issues have been addressed in the November 2012 CAP and both CMOM reports.

The Water Authority annually examines sewer system performance, sets specific steps for decreasing SSOs and mitigating their impacts, and has a program of continuous improvement.

Starting with the new NPDES Permit effective October 1, 2012, the Water Authority currently reports all SSOs regardless of volume. The Water Authority acknowledges the previous practice of only reporting spills of greater than 50 gallons. During the comment period for the proposed NPDES permit, the Water Authority requested a clarification of this requirement. The EPA provided a clear response and the Water Authority is currently reporting all SSOs.

B. Finding 2. PART I., SECTION C. MONITORING AND REPORTING, Provision 6.

The Authority was found to be deficient in the following as it relates to the overflow reporting requirements of the Permit:

a) The Authority determined it did not need to report SSOs less than or equal to 50 gallons.
b) The Authority failed to report SSOs over 50 gallons.
c) The Authority failed to accurately estimate and report SSO volumes.
d) The Authority failed to record the volume of at least one SSO.
e) The Authority failed to report the ultimate discharge location of an SSO.
f) The Authority failed to orally report SSOs to EPA and NMED Surface Water Quality Bureau within 24 hours of becoming aware of the overflow.

Response:

1. See Paragraph A on previous page in response to Finding 1.
2. The Water Authority addressed this issue in the November 2012 CAP. The failure to record an SSO over 50 gallons was not typical but was the exception. Through improved processes, all SSOs, regardless of volume are being recorded and reported.
3. This issue was addressed in the November 2012 CAP and the FY2013 CMOM Report. Training was implemented May 1, 2013.
4. The Water Authority addressed this issue in the November 2012 CAP. The failure to record a volume was not typical but was the exception. Through improved processes, all volumes are being recorded and reported.
5. The Water Authority addressed this issue in the November 2012 CAP. The failure to record a discharge location was not typical but was the exception. Through improved processes, all discharge locations are being recorded and reported.
6. The Water Authority addressed this issue in the November 2012 CAP. The Water Authority has implemented improved processes to assure that proper oral reporting to EPA, NMED Surface Water Quality Bureau, U. S. Fish and Wildlife Service, and the Pueblo of Isleta occurs, and to document this reporting. Recently, the U.S. Fish and Wildlife Service informed EPA that they no longer requested reporting and a permit modification is forthcoming.

C. Finding 3. PART I., SECTION C. MONITORING AND REPORTING, Provision 7.

Authority staff stated that it is not standard practice to report the occurrence of SSOs to the Pueblo of Isleta or to the U. S. Fish and Wildlife Service. No evidence was presented that demonstrated this requirement had been met. The Collection System Manager stated that he recently asked EPA for clarification on the Permit requirement and was told that all SSOs are considered to endanger health and/or the environment and should be reported to the Pueblo of Isleta and to the U. S. Fish and Wildlife Service.

Response:

See Paragraph B.6 above.

D. Finding 4. PART III., SECTION B. PROPER OPERATIONS AND MAINTENANCE, Provision 2. DUTY TO MITIGATE

Authority staff indicated that when responding to an SSO, their first priority is to break or remove the blockage in the sewer and restore normal flow to the system. They further stated that attempting to capture wastewater once it had entered storm drains was not standard procedure. Failure to attempt to capture spilled wastewater creates a reasonable likelihood of adversely affecting human health or the environment. It should be noted that the storm sewer system located within the Authority's service area is owned and operated by the City. Authority staff indicated that the City is typically notified when an SSO enters a storm drain; however, no record of this notification was available for review. Authority staff further stated that the storm sewer system discharges to retention and detention basins in some locations as well as surface waters; however, Authority staff were uncertain which storm drains went to basins and which went to surface waters.

Response:

The Water Authority addressed these issues in the November 2012 CAP and CMOM reports. The Water Authority has implemented a process to capture wastewater prior to reaching a storm drain. This is further discussed in the response to Area of Concern (AOC) 2. The Water Authority has, with the cooperation of the City of Albuquerque, implemented a process of washing sewage spill areas including storm drains. The Water Authority recognizes spills may impact more than just the City's facilities and has met with the Municipal Separate Storm Sewer System (MS4) Permittees in the Water Authority's service area as well as with the MRGCD. As a result of these meetings and discussions, the Water Authority's Overflow Emergency Response Plan (OERP) has been modified, including the designation of points of contact for each entity. As discussed in the CMOM reports, these processes are being followed where assistance is needed in response to a spill. The Water Authority provides copies of the SSO DMR to the City.

E. Finding 5. PART III., SECTION B. PROPER OPERATION AND MAINTENANCE, Provision 3. PROPER OPERATION AND MAINTENANCE.

The Authority failed to properly operate and maintain the collection system in order to minimize prohibited discharges from the collection system. Examples of improper operation and maintenance include failure to maintain and update written SOPs for routine maintenance and failure to conduct a force main evaluation and inspection program. For example, one force main had multiple ruptures and spills before system operations were modified (i.e., pump pressure was reduced). Further evidence of improper operation and maintenance is the existence of a large number of SSOs (both reported and unreported) caused by the accumulation of grease, roots, and debris.

According to the Collection Section Manager, the Authority does not currently maintain an O&M manual or SOPs for routine and preventive maintenance of the sanitary sewer system. Field crews conducting cleaning and maintenance activities rely primarily on on-the-job training. The Collection Section Manager further stated that the Authority is pursuing implementation of a CMOM program for the first time. Refer to Appendix C for the Revised Corrective Action Plan, which describes implementation of the CMOM program.

Response:

As discussed in the response to Finding 1, the Water Authority acknowledges that prohibited discharges have occurred and has taken specific steps for decreasing SSOs and mitigating their impacts. As described in the CAP and the CMOM reports, this specifically includes an emphasis on FOG to combat FOG caused SSOs.

As discussed in the CAP and the CMOM reports, the Water Authority has now performed force main inspections. As a correction to Finding 5, the force main and pumping station were operated as designed but this resulted in excessive pressure that resulted in line breaks. The Water Authority no longer accepts the pipe type installed in this facility, i.e. glued joint Schedule 40 PVC.

In the past, the Water Authority has assured standard operating procedures through an in-house training and certification program that supplements and is more in depth than the required State certification program.

To clarify a misstatement in Finding 5, the training program consists of classroom training by a dedicated trainer. In addition, there is an "on-the-job" component in which the trainee is observed and graded by a Journeyman Operator. This "on-the-job" component is to demonstrate proficiency in operating maintenance equipment.

As discussed in the November 2012 CAP and CMOM reports, improvement in standard operating procedures (SOPs) has resulted from the development, implementation and continuous improvement of the OERP. In addition, the Inspection Report clarifies that written SOPs are also necessary. As a part of its program of continuous improvement, the Water Authority commits to develop and implement written SOPs.

Areas of Concern:

A. <u>AOC 1. The Authority appeared to have inaccurately estimated its unique pipe cleaning cycle.</u>

Response:

This issue has been addressed in the November 2012 CAP and the CMOM reports. The Water Authority identified a cleaning goal in the FY2013 CMOM report based on *Core Attributes of Effectively Managed Wastewater Collection Systems*.

B. <u>AOC 2. The Authority does not maintain an inventory of spill containment equipment.</u>

Response:

This issue has been addressed in the November 2012 CAP and the CMOM reports. The goal is to contain and remove sewage spills. The Water Authority has implemented a process in which this containment and removal is accomplished, when possible, by a second Vactor that is dispatched to remove the spill prior to reaching a drop inlet. This field tested approach has many advantages that make it more appropriate than sand bags for nearly all spills. The second Vactor is typically already in the field and will arrive much more quickly than equipment that is only used in response to a spill. The topography of

the Water Authority service area is such that only a small volume can be contained before spilling around a sand bag containment and causing environmental concerns such as spilling to a pervious area or an unblocked traffic lane.

C. **AOC 3. Authority staff was unaware of proper SSO response procedures.**

Response:

At the time of the Inspection, the Water Authority had not issued its first OERP. Per the CAP and the FY2013 CMOM, the first OERP was issued May 1, 2013. Also on May 1, 2013, the Water Authority provided spill volume calculation training and implemented the requirement to estimate spill volumes rather than utilize a volume range approach. The Water Authority has identified a need for periodic training which is currently being developed and will be implemented when complete.

D. **AOC 4. The Authority has no formal written procedures for SSO emergency response and reporting protocols.**

Response:

This issue was addressed in the November 2012 CAP and the CMOM reports. A written OERP has been issued that provides procedures and protocols. In addition, per discussion in response to a portion of Finding 5, the Water Authority commits to develop written SOPs.

E. **AOC 5. The Authority did not have an effective system for prioritizing service requests.**

Response:

This issue was addressed in the November 2012 CAP and FY2013 CMOM. A change was implemented and all spills are dispatched as a Priority 5, the highest level.

F. **AOC 6. The Authority does not investigate the actual start time of SSO events.**

Response:

This issue was addressed in the November 2012 CAP and the FY2013 CMOM. The Water Authority has trained staff to estimate start time of SSOs. The actual start time is investigated, estimated and recorded.

G. **AOC 7. The Authority does not have a formal written Sewer System Management Plan or Sewer System Operation and Maintenance Manual(s).**

Response:

WEF Manual of Practice No. FD-17 Third Edition, *Prevention and Control of Sewer System Overflows* (p. 52-53, MOP FD-17) describes a Sewer System Management Plan (SSMP) as an enrollee requirement

in programs that have been developed and implemented in some states. New Mexico has not developed such a program. While the Water Authority is not required to have an SSMP, the CMOM reports have addressed most if not all the SSMP components (p. 53, MOP FD-17).

Also, please see the response to Finding 5 for further relevant discussion.

H. AOC 8. There was inconsistent use of terminology on various forms and records.

Response:

Consistency of terminology had been greatly improved through the use of a computerized maintenance management system (CMMS), Maximo, drop down descriptions. As a part of its program of continuous improvement, the Water Authority agrees that improvements are appropriate in documenting the specific cleaning implemented, etc. The Water Authority will address this issue and implement modifications to its CMMS.

I. AOC 9. Implementation of a Fats, Oils and Grease Program

Response:

The FOG policy has been approved by the Water Authority Board. The Pretreatment Program has been working with the City of Albuquerque Environmental Health Department to receive notice of new restaurants. This exchange happens approximately every 6 months.

J. AOC 10. Modifications to reports did not include identification or date.

Response:

Staff has been instructed in this requirement which will be included in training.

K. AOC 11. Inconsistencies were found between separate documents reporting the same event.

Response:

This issue was addressed in the November 2012 CAP. However, it is noted that the revised procedure requires the crew to estimate the actual start of the spill. Since this may differ from the time reported to Dispatch, this is not an inconsistency.

Appendix 8 Administrative Complaint

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

JUN 0 9 2015

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7005 1820 0003 7449 5225

John M. Stomp III, P.E.
Chief Operating Officer, Water Utility Authority
Albuquerque Bernalillo County Water Utility Authority
4201 Second Street SW
Albuquerque, NM 87105

Re: Notice of Proposed Assessment of Class II Civil Penalty
Docket Number: CWA-06-2015-1777
NPDES Permit Number: NM0022250

Dear Mr. Stomp:

Enclosed is an administrative complaint (Complaint) issued to Albuquerque Bernalillo County Water Utility Authority for violation of Section 301(a) of the Clean Water Act (33 U.S.C. § 1251 et seq.). Violations were identified through a file review. The violations alleged include, but are not limited to, the following:

1. unauthorized discharges; and

2. exceedances of effluent limitations.

You have the right to request a hearing regarding the violations alleged in the Complaint and the proposed administrative civil penalty. Please refer to the enclosed Part 22, "Consolidated Rules of Practice," for information regarding hearing and settlement procedures. Note that should you fail to request a hearing within thirty days of your receipt of the Complaint, you will waive your right to such a hearing, and the proposed civil penalty of $134,000.00 may be assessed against you without further proceedings.

Whether or not you request a hearing, we invite you to confer informally with the Environmental Protection Agency (EPA). You may represent Albuquerque Bernalillo County Water Utility Authority, or be represented by an attorney at any conference, whether in person or by telephone. EPA encourages all parties against whom it files a Complaint proposing assessment of a penalty to pursue the possibility of settlement as a result of an informal conference.

EPA is committed to ensuring compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) program and my staff will assist you in any way possible. If you have any questions, or wish to discuss the possibility of a settlement of this matter, please contact Robert Houston, of my staff, at (214) 665-8565.

Sincerely,

John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosures

cc: w/Complaint - Regional Hearing Clerk

Charles S. Leader, P.E.
Manager, Plant Operations Division
Albuquerque Bernalillo County Water Utility Authority
4201 Second Street SW
Albuquerque, NM 87105

Bruce Yurdin
Acting Bureau Chief
Surface Water Quality Bureau
New Mexico Environment Department
P.O. Box 5469
Santa Fe, NM 87502-5469

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 6

In the Matter of	§	Docket No. CWA-06-2015-1777
	§	
Albuquerque Bernalillo County	§	Proceeding to Assess a Class II
Water Utility Authority,	§	Civil Penalty under Section 309(g)
a New Mexico political subdivision,	§	of the Clean Water Act
	§	
Respondent	§	ADMINISTRATIVE COMPLAINT
	§	
NPDES No. NM0022250	§	

I. Statutory Authority

This Complaint is issued under the authority vested in the Administrator of the United States Environmental Protection Agency ("EPA") by Section 309(g) of the Clean Water Act ("Act"), 33 U.S.C. § 1319(g). The Administrator of EPA delegated the authority to issue this Complaint to the Regional Administrator of EPA Region 6, who delegated this authority to the Director of the Compliance Assurance and Enforcement Division of EPA Region 6 ("Complainant"). This Class II Administrative Complaint is issued in accordance with the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits," including rules related to administrative proceedings not governed by Section 554 of the Administrative Procedures Act, 40 C.F.R. §§ 22.50 through 22.52.

Based on the following Findings, Complainant finds that Respondent has violated the Act and the regulations promulgated under the Act and should be ordered to pay a civil penalty.

II. Findings of Fact and Conclusions of Law

1. Albuquerque Bernalillo County Water Utility Authority ("Respondent") is a political subdivision of the State of New Mexico, and as such, Respondent is a "person," as that term is defined at Section 502(5) of the Act, 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2.

2. At all relevant times, Respondent owned or operated a wastewater treatment plant located on Second Street in the City of Albuquerque, Bernalillo County, New Mexico ("facility"), and was therefore an "owner or operator" within the meaning of 40 C.F.R. § 122.2.

3. At all relevant times, the facility acted as a "point source" of a "discharge" of "pollutants" with its municipal wastewater to the receiving waters of the Rio Grande in Segment 20.6.4.105 of the Rio Grande Basin, which is considered a "water of the United States" within the meaning of Section 502 of the Act, 33 U.S.C. § 1362, and 40 C.F.R. § 122.2.

4. Because Respondent owned or operated a facility that acted as a point source of discharges of pollutants to waters of the United States, Respondent and the facility were subject to the Act and the National Pollutant Discharge Elimination System ("NPDES") program.

5. Under Section 301 of the Act, 33 U.S.C. § 1311, it is unlawful for any person to discharge any pollutant from a point source to waters of the United States, except with the authorization of, and in compliance with, an NPDES permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342.

6. Section 402(a) of the Act, 33 U.S.C. § 1342(a), provides that the Administrator of EPA may issue permits under the NPDES program for the discharge of pollutants from point sources to waters of the United States. Any such discharge is subject to the specific terms and conditions prescribed in the applicable permit.

7. Respondent applied for and was issued NPDES Permit No. NM0022250 ("permit") under Section 402 of the Act, 33 U.S.C. § 1342, which became effective on October 1, 2012. At all relevant times, Respondent was authorized to discharge pollutants from the facility to waters of the United States only in compliance with the specific terms and conditions of the permit.

8. Part I of the permit requires Respondent to sample and test its effluent and monitor its compliance with permit conditions according to specific procedures, in order to determine the facility's compliance or non-compliance with the permit and applicable regulations. It also requires Respondent to file with EPA certified Discharge Monitoring Reports ("DMRs") of the results of monitoring, and Non-Compliance Reports when appropriate.

9. Part I.A of the permit places certain limitations on the quality and quantity of effluent discharged by Respondent. The relevant discharge limitations are specified in Attachment A.

10. Certified DMRs filed by Respondent with EPA in compliance with the permit show discharges of pollutants from the facility that exceed the permitted effluent limitations established in Part I.A of the permit, as specified in Attachment B.

11. Sanitary Sewer Overflow ("SSO") bypass reports filed by Respondent with EPA in compliance with the permit show unauthorized discharges. The unauthorized discharges are specified in Attachment C.

12. On May 17, 2011, EPA issued Administrative Order number CWA-06-2011-1777 to Respondent citing exceedances of effluent limitations, unauthorized discharges, and failure to report parameters. However, DMRs submitted by Respondent indicate that violations are continuing to occur. The Administrative Order also cites a sulfur dioxide indicator failure which led to a fish kill. Respondent failed to report the fish kill within twenty-four (24) hours as required by the permit.

13. On June 4, 2013, EPA issued Administrative Order Docket Number CWA-06-2013-1807 to Respondent citing exceedances of effluent limitations. The Administrative Order requires that Respondent take corrective action to eliminate and prevent a recurrence of permit violations; however, the DMRs submitted by Respondent indicate that violations are continuing to occur.

14. On July 22, 2014, EPA issued Administrative Order Docket Number CWA-06-2014-1817 to Respondent citing exceedances of effluent limitations and unauthorized discharges. The Administrative Order requires that Respondent take corrective action to eliminate and prevent recurrence of permit violations; however, DMRs and non-compliance reports submitted by Respondent indicate that violations are continuing to occur.

15. On March 24, 2015, EPA issued Administrative Order Docket Number CWA-06-2015-1733 to Respondent citing exceedances of effluent limitations and unauthorized discharges. The Administrative Order requires that Respondent take corrective action to eliminate and prevent recurrence of permit violations.

16. On March 25, 2015, EPA issued Administrative Order Docket Number CWA-06-2015-1752 to Respondent citing a bypass at the facility. According to Respondent's non-compliance report dated March 3, 2015, Respondent discharged approximately 6 million gallons of primary clarifier effluent into the Rio Grande due to a power spike.

17. Each violation of the conditions of the permit or regulations described above is a violation of Section 301 of the Act, 33 U.S.C. § 1311. Also, each unauthorized discharge is a violation of Section 301 of the Act, 33 U.S.C. § 1311.

18. Under Section 309(g)(2)(B) of the Act, 33 U.S.C. § 1319(g)(2)(B), Respondent is liable for a civil penalty in an amount not to exceed $16,000 per day for each day during which a violation continues, up to a maximum of $187,500.00.[a]

19. EPA has notified the New Mexico Environment Department of the issuance of this Complaint and has afforded the State an opportunity to consult with EPA regarding the

[a] Violations which occurred after January 12, 2009 through December 6, 2013, are subject to penalties not to exceed $16,000 per day for each day during which a violation continues, up to a maximum of $177,500. Violations occurring after December 6, 2013 are subject to $16,000 per day for each day during which a violation continues, up to a maximum of $187,500. 78 Fed. Reg. 66647 (December 6, 2013).

assessment of an administrative penalty against Respondent as required by Section 309(g)(1) of the Act, 33 U.S.C. § 1319(g)(1).

20. EPA has notified the public of the filing of this Complaint and has afforded the public thirty (30) days in which to comment on the Complaint and on the proposed penalty as required by Section 309(g)(4)(A) of the Act, 33 U.S.C. § 1319(g)(4)(A). At the expiration of the notice period, EPA will consider any comments filed by the public.

III. Proposed Penalty

21. Based on the foregoing Findings, and pursuant to the authority of Sections 309(g)(1) and (g)(2)(B) of the Act, 33 U.S.C. §§ 1319(g)(1) and (g)(2)(B), EPA Region 6 hereby proposes to assess against Respondent a penalty of one hundred thirty-four thousand dollars ($134,000.00).

22. The proposed penalty amount was determined based on the statutory factors specified in Section 309(g)(3), 33 U.S.C. § 1319(g)(3), which includes such factors as the nature, circumstances, extent and gravity of the violations, economic benefits, if any, prior history of such violations, if any, degree of culpability, and such matters as justice may require.

23. Complainant has specified that the administrative procedures specified in 40 C.F.R. Part 22, Subpart I, shall apply to this case, and the administrative proceedings shall not be governed by Section 554 of the Administrative Practice Act. However, pursuant to 40 C.F.R. § 22.42(b), Respondent has a right to elect a hearing on the record in accordance with 5 U.S.C.

§ 554, and Respondent waives this right unless Respondent in its answer requests a hearing in accordance with 5 U.S.C. § 554.

IV. Failure to File an Answer

24. If Respondent wishes to deny or explain any material allegation listed in the above Findings or to contest the amount of the penalty proposed, Respondent must file an Answer to this Complaint within thirty (30) days after service of this Complaint whether or not Respondent requests a hearing as discussed below.

25. The requirements for such an Answer are set forth at 40 C.F.R. § 22.15 (copy enclosed). Failure to file an Answer to this Complaint within thirty (30) days of service of the Complaint shall constitute an admission of all facts alleged in the Complaint and a waiver of the right to hearing. Failure to deny or contest any individual material allegation contained in the Complaint will constitute an admission as to that finding or conclusion under 40 C.F.R. § 22.15(d).

26. If Respondent does not file an Answer to this Complaint within thirty (30) days after service of this Complaint, a Default Order may be issued against Respondent pursuant to 40 C.F.R. § 22.17. A Default Order, if issued, would constitute a finding of liability, and could make the full amount of the penalty proposed in this Complaint due and payable by Respondent without further proceedings thirty (30) days after a Final Default Order is issued.

27. Respondent must send its Answer to this Complaint, including any request for hearing, and all other pleadings to:

Regional Hearing Clerk (6RC-D)
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Respondent shall also send a copy of its Answer to this Complaint to the following EPA attorney assigned to this case:

Ellen-Chang-Vaughan (6RC-EW)
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

28. The Answer must be signed by Respondent, Respondent's counsel, or other representative on behalf of Respondent and must contain all information required by 40 C.F.R. §§ 22.05 and 22.15, including the name, address, and telephone number of Respondent and Respondent's counsel. All other pleadings must be similarly signed and filed.

V. Notice of Opportunity to Request a Hearing

29. Respondent may request a hearing to contest any material allegation contained in this Complaint, or to contest the appropriateness of the amount of the proposed penalty, pursuant to Section 309(g) of the Act, 33 U.S.C. § 1319(g). The procedures for hearings are set out at 40 C.F.R. Part 22, with supplemental rules at 40 C.F.R. § 22.38.

30. Any request for hearing should be included in Respondent's Answer to this Complaint; however, as discussed above, Respondent must file an Answer meeting the requirements of 40 C.F.R. § 22.15 in order to preserve the right to a hearing or to pursue other relief.

31. Should a hearing be requested, members of the public who commented on the issuance of the Complaint during the public comment period will have a right to be heard and to present evidence at such hearing under Section 309(g)(4)(B) of the Act, 33 U.S.C. § 1319(g)(4)(B).

VI. Settlement

32. EPA encourages all parties against whom civil penalties are proposed to pursue the possibility of settlement through informal meetings with EPA. Regardless of whether a formal hearing is requested, Respondent may confer informally with EPA about the alleged violations or the amount of the proposed penalty. Respondent may wish to appear at any informal conference or formal hearing personally, by counsel or other representative, or both. To request an informal conference on the matters described in this Complaint, please contact Robert Houston, of my staff, at (214) 665-8565.

33. If this action is settled without a formal hearing and issuance of an opinion by the Presiding Officer pursuant to 40 C.F.R. § 22.27, this action will be concluded by issuance of a Consent Agreement and Final Order ("CAFO") pursuant to 40 C.F.R. § 22.18(b). The issuance

of a CAFO would waive Respondent's right to a hearing on any matter stipulated to therein or alleged in the Complaint. Any person who commented on this Complaint would be notified and given an additional thirty (30) days to petition EPA to set aside any such CAFO and to hold a hearing on the issues raised in the Complaint. Such a petition would be granted and a hearing held only if the evidence presented by the petitioner's comment was material and was not considered by EPA in the issuance of the CAFO.

34. Neither assessment nor payment of a penalty in resolution of this action will affect Respondent's continuing obligation to comply with all requirements of the Act, the applicable regulations and permits, and any separate Compliance Order issued under Section 309(a) of the Act, 33 U.S.C. § 1319(a), including one relating to the violations alleged herein.

6.9.15
Date

John Blevins
Director
Compliance Assurance and
Enforcement Division

CERTIFICATE OF SERVICE

I certify that the foregoing Class II Administrative Complaint was sent to the following persons, in the manner specified, on the date below:

Original hand-delivered:

Regional Hearing Clerk (6RC-D)
U.S. EPA, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Copy by certified mail,
return receipt requested:

John M. Stomp III, P.E.
Chief Operating Officer, Water Utility Authority
Albuquerque Bernalillo County Water Utility Authority
4201 Second Street SW
Albuquerque, NM 87105

Charles S. Leader, P.E.
Manager, Plant Operations Division
Albuquerque Bernalillo County Water Utility Authority
4201 Second Street SW
Albuquerque, NM 87105

Bruce Yurdin
Acting Bureau Chief
Surface Water Quality Bureau
New Mexico Environment Department
P.O. Box 5469
Santa Fe, NM 87502-5469

Copy hand-delivered:

Ellen Chang-Vaughan (6RC-EW)

Dated: JUN 10 2015

Jackie Allen

ATTACHMENT A

EFFLUENT CHARACTERISTIC	DISCHARGE LIMITATIONS (lbs/day, unless stated) (mg/l, unless stated) (unless noted)						MONITORING REQUIREMENTS		
	Storet Code	30-Day Average	7-Day Average	30-Day Average	Average	7-Day Max.	Daily Frequency	Measurement Type	Sample
JULY 1 - OCTOBER 31 LIMITATIONS (cont)									
Dissolved Oxygen (minimum)	00300	N/A	N/A	4		N/A	N/A	Once/Day	24-Hour Composite
Ammonia Nitrogen, Total (as N)	00610	634	951	1 (*7)		N/A	1.5	Once/Day	24-Hour Composite
Total Inorganic Nitrogen (*8)	00640								
Qs4D < 34.6 MGD (*a)		4228	N/A	6.67 (*7)	N/A	10	Once/Week	24-Hour Composite	
Qs4D ≥ 34.6 MGD (*d)		6155	N/A	9.71 (*7)	N/A	14.56	Once/Week	24-Hour Composite	
Whole Effluent Lethality (*5) 7-Day NOEC Qs4D <53.7 MGD (*a)	22414		min. (*6)	min.					
Ceriodaphnia dubia		—	—	100% (*6)		100%	N/A	1/Quarter	24-Hour Composite
Pimephales promelas		—	—	100% (*6)		100%	N/A	1/Quarter	24-Hour Composite
Qs4D ≥ 34.6 MGD (*d)									
Ceriodaphnia dubia		—	—	69% (*6)	69%	N/A	1/Quarter	24-Hour Composite	
Pimephales promelas		—	—	69% (*6)	69%	N/A	1/Quarter	24-Hour Composite	
NOVEMBER 1 - JUNE 30 LIMITATIONS									
Carbonaceous Biochemical Oxygen Demand (5-Day)	80082								
Qs4D < 34.6 MGD (*a)		6338	7606	8	12	N/A	Once/Day	24-Hour Composite	
34.6 MGD ≤ Qs4D < 183 MGD (*b)		9508	14261	15	22.5	N/A	Once/Day	24-Hour Composite	
Qs4D $ 183 MGD (*c)		15846	25354	25		40	N/A	Once/Day	24-Hour Composite
Dissolved Oxygen (minimum)	00300								
Qs4D < 183 MGD (*e)		N/A	N/A	4		N/A	N/A	Once/Day	24-Hour Composite
Qs4D ≥ 183 MGD (*c)		N/A	N/A	2		N/A	N/A	Once/Day	24-Hour Composite
Ammonia Nitrogen, Total (as N)	00610								
Qs4D < 183 MGD (*e)		792	1204	1.25 (*7)	N/A	1.9	Once/Day	24-Hour Composite	
Qs4D ≥ 183 MGD (*c)		1901	2852	3 (*7)		N/A	4.5	Once/Day	24-Hour Composite
Total Inorganic Nitrogen (*8)	00640								

Attachment B - Effluent Violations

Date	Outfall	Parameter	Violation	Permit Limit
January 31, 2011	001A	Coliform, Fecal Daily Maximum	790 per 100 Mil	200 per 100 Mil
February 28, 2011	001A	Solids, Total Suspended 7 Day Average	34,045 lbs./day	28,522 lbs./day
February 28, 2011	001A	Solids, Total Suspended 30 Day Average	37 mg/L	30 mg/L
February 28, 2011	001A	Solids, Total Suspended 7 Day Average	83 mg/L	45 mg/L
March 31, 2011	001A	Chlorine, Total Residual Inst. Maximum	0.35 mg/L	0.011 mg/L
April 30, 2011	001A	Nitrogen, Ammonia Total 30 Day Average	2,231 lbs./day	1,901 lbs./day
April 30, 2011	001A	Nitrogen, Ammonia Total 30 Day Average	5.1 mg/L	3 mg/L
April 30, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	18.3 mg/L	4.5 mg/L
May 31, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	12.8 mg/L	4.5 mg/L
June 30, 2011	001A	Chlorine, Total Residual Inst. Maximum	0.07 mg/L	0.011 mg/L
July 31, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	2 mg/L	1.5 mg/L
July 31, 2011	001A	Coliform, Fecal Daily Maximum	1,373 per 100 Mil	200 per 100 Mil
July 31, 2011	001A	Nitrogen, Inorganic Total 30 Day Average	10.64 mg/L	9.71 mg/L
July 31, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	2 mg/L	1.5 mg/L
August 31, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	2 mg/L	1.5 mg/L
September 30, 2011	001A	Nitrogen, Ammonia Total Daily Maximum	1.9 mg/L	1.5 mg/L
September 30, 2011	001A	Nitrogen, Inorganic Total Daily Maximum	16.26 mg/L	14.56 mg/L
September 30, 2011	001A	pH, Minimum	5.7 S.U.	6.6 S.U.
September 30, 2011	001A	Coliform, Fecal Daily Maximum	3,000 per 100 Mil	200 per 100 Mil
October 31, 2011	001A	Coliform, Fecal Daily Maximum	240 per 100 Mil	200 per 100 Mil
December 31, 2011	001A	Coliform, Fecal Daily Maximum	220 per 100 Mil	200 per 100 Mil
October 31, 2012	001A	Mercury, Total Daily Maximum	0.014 ug/L	0.012 ug/L

Date	Outfall	Parameter	Violation	Permit Limit
October 31, 2012	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,261 lbs/day	709 lbs/day
November 30, 2012	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,235 lbs./day	709 lbs./day
December 31, 2012	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,230 lbs./day	709 lbs./day
January 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,277 lbs./day	709 lbs./day
February 28, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,290 lbs./day	709 lbs./day
March 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,107 lb.s/day	709 lbs./day
May 31, 2013	001A	Ammonia Nitrogen, Total Daily Maximum	1.6 mg/L	1.5 mg/L
April 30, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,557 lbs./day	709 lbs./day
May 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,465 lbs./day	709 lbs./day
June 30, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	900 lbs./day	709 lbs./day
June 30, 2013	001A	E. Coli Bacteria, Daily Maximum	119 Colonies/100 ml	88 Colonies/100 ml
July 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	858 lbs./day	709 lbs./day
August 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	854 lbs./day	709 lbs./day
September 30, 2013	001A	E. Coli Bacteria, Daily Maximum	153 Colonies/100 ml	88 Colonies/100 ml
September 30, 2013	001A	Ammonia Nitrogen, Total Daily Maximum	1,654 lbs./day	951 lbs./day
September 30, 2013	001A	Ammonia Nitrogen, Total Daily Maximum	3.8 mg/L	1.5 mg/L
September 30, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	915 lbs./day	709 lbs./day
October 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	898 lbs./day	709 lbs./day
December 31, 2013	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,154 lbs./day	709 lbs./day
December 31, 2013	001A	Mercury, Total Daily Maximum	0.014 ug/L	0.012 ug/L
February 28, 2014	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	1,082 lbs./day	709 lbs./day
March 31, 2014	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	969 lbs./day	709 lbs./day

Date	Outfall	Parameter	Violation	Permit Limit
April 30, 2014	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	810 lbs/day	709 lbs/day
May 31, 2014	001A	Biochemical Oxygen Demand, 5-Day, 30-Day Average	866 lbs/day	709 lbs/day
July 31, 2014	001A	E. Coli Bacteria, Daily Maximum	411 Colonies/100 ml	88 Colonies/100 ml
August 31, 2014	001A	E. Coli Bacteria, Daily Maximum	104 Colonies/100 ml	88 Colonies/100 ml
November 30, 2014	001A	E. Coli Bacteria, Daily Maximum	727 Colonies/100 ml	88 Colonies/100 ml

Attachment C
Unauthorized Discharges

Date	Location	Volume
January 1, 2011	Montano & 4th Street, NW Storm sewer	500 gallons
January 3, 2011	10300 Golf Course Rd. NW	500 gallons
February 4, 2011	1535 Larkin Rd. SW	100 gallons
February 16, 2011	8001 Mountain Rd.	500 gallons
February 18, 2011	Candelaria & Morris, NE Street & Storm sewer	100 gallons
March 5, 2011	10308 Candeleria & Morris Rd.	100 gallons
March 5, 2011	9180 Coors Blvd.	1,000 gallons
March 14, 2011	Kathryn & Dickerson	100 gallons
March 19, 2011	Westgate & Detitum Busin	1,000 gallons
March 19, 2011	64th & Bluewater	1,000 gallons
March 20, 2011	2420 Comanche Ave.	1,000 gallons
March 21, 2011	2420 Comanche Rd. NE	500 gallons
March 21, 2011	West Gate & Detitum Busin SW	1,000 gallons
March 25, 2011	2205 Broadway Blvd. SE	500 gallons
March 26, 2011	Pennsylvania & Rhode Island, SE Street	100 gallons
March 27, 2011	2820 Jessie James Rd.	500 gallons
March 28, 2011	Mojave St., NW Street	100 gallons
March 28, 2011	Bluewater & 64th St., NW Street & Storm sewer	100 gallons
March 28, 2011	Pennsylvania & Rhode Island	100 gallons
March 28, 2011	2820 Jesse James Dr.	500 gallons
April 5, 2011	Cathy Ave., NE Storm sewer & Arroyo	500 gallons
April 14, 2011	Broadway Blvd & Avenida Cesar Chavez Street	1,000 gallons
April 19, 2011	Broadway Blvd & Avenida Cesar Chavez Street	1,000 gallons
May 7, 2011	2921 General Stillwell St.	100 gallons
May 9, 2011	San Diego Ave., NE Street	100 gallons
May 10, 2011	8620 San Diego Ave.	100 gallons
May 12, 2011	Candaleria & Pitt Street & Storm sewer	100 gallons
May 14, 2011	Columbus Circle, NW Golf Course	500 gallons
May 18, 2011	9906 Columbus Cir.	500 gallons
June 7, 2011	5828 Avenida La Barrance	500 gallons
June 10, 2011	Montgomery & Carlisle Street & Arroyo	500 gallons
July 5, 2011	University & Sunport, SE Storm sewer	100 gallons
July 11, 2011	University and Sunport, SE Street & Storm sewer	500 gallons
August 21, 2011	San Pedro & Topke, NE Street	500 gallons
August 21, 2011	Outfall 001	10,000 gallons
September 13, 2011	7521 Menaul Blvd.	500 gallons
October 3, 2011	Sunport & I-25 Storm sewer & Arroyo	1,000 gallons
October 3, 2011	Sun Port & I-25	10,000 gallons
November 12, 2011	1001 Louisiana	500 gallons
November 18, 2011	4710 San Mateo Blvd.	500 gallons
November 24, 2011	Blumenshine & Roseberry	10,000 gallons
November 24, 2011	Layton Ave. NE	1,000 gallons

Attachment C
Unauthorized Discharges

Date	Location	Volume
December 8, 2011	64th & Bluewater, NW Street & Storm sewer	500 gallons
December 24, 2011	Blumenshine & Roseberry, SW Yard & Dirt lot	1,000 gallons
December 31, 2011	Blumenshine & Roseberry, SW Open lot	1,000 gallons
January 3, 2012	Rio Puerco Trail, SW Park	500 gallons
January 3, 2012	110 Altez	100 gallons
January 14, 2012	Claremont Ave., NE Street	500 gallons
January 14, 2012	64th & Bluewater, NW Street & Storm sewer	100 gallons
January 23, 2012	Griegos Rd, NW Street & Parking Lot	500 gallons
January 23, 2012	417 Griegos	101 gallons
January 25, 2012	Nassau Dr., NE Street	500 gallons
January 25, 2012	11523 Nassau Dr.	101 gallons
January 29, 2012	2469 Corrals Rd.	1,000 gallons
February 9, 2012	2309 Luchetti	1,000 gallons
February 17, 2012	Sun Port & Yale Blvd.	100 gallons
February 19, 2012	10323 Chandler Dr.	100 gallons
February 27, 2012	915 Broadway Blvd.	1,000 gallons
March 7, 2012	Osuna Road, NE Street	100 gallons
March 10, 2012	Riverview Drive, NW Storm sewer	100 gallons
March 25, 2012	Orfero Trail, NW Arroyo & Street	100 gallons
April 5, 2012	Tramway Terrace Loop, NE Street	1,000 gallons
April 8, 2012	Juan Tabo Blvd., NE Street & Storm Sewer	1,000 gallons
April 19, 2012	Four Hills Rd & Pinon Creek Arroyo	500 gallons
April 22, 2012	Mary Ellen St & Aspen Avenue Street	1,000 gallons
April 25, 2012	Mary Ellen Street Street & storm sewer	1,000 gallons
April 25, 2012	Spence Ave., SE Street	500 gallons
May 19, 2012	Sevilla Avenue, NW Arroyo	1,000 gallons
May 22, 2012	Montgomery Blvd., NE Street & storm sewer	1,000 gallons
May 26, 2012	Jade park Ave. & Ray Street, NE Street	500 gallons
May 29, 2012	Eastridge Drive., NE Street	500 gallons
June 23, 2012	Irving & Rainbow, NW Street	100 gallons
June 28, 2012	Eubank Blvd., NE Street	100 gallons
July 7, 2012	Lafayette Drive, NE Arroyo	500 gallons
July 25, 2012	Taylor Ranch Road, NW Street	500 gallons
July 29, 2012	Wyoming & Comache, NE Street	100 gallons
August 1, 2012	Hidden Valley Drive, SE Street	500 gallons
October 6, 2012	Coors Blvd., NW	500 gallons
October 17, 2012	Lakeview Place, SW	500 gallons
October 26, 2012	Iron Street, SE	50 gallons
October 29, 2012	San Joaquin Ave, SE	500 gallons
October 29, 2012	Richmond Drive, SE	100 gallons
November 1, 2012	Richmond Drive, SE	100 gallons
November 3, 2012	Juan Tabo, NE	500 gallons

Attachment C
Unauthorized Discharges

Date	Location	Volume
November 12, 2012	Kathryn Ave, SE	Unknown
November 12, 2012	Septage Spill - SWRP Septage Site	20 gallons
November 16, 2012	Willow Ct., SE	Unknown
December 3, 2012	Lead Avenue	50 gallons
December 8, 2012	Stagecoach Lane, SE	50 gallons
December 17, 2012	Coal / I-25	50 gallons
December 19, 2012	Burmuda & Vienna, NE	100 gallons
December 20, 2012	Lomas Verde Avenue, NE	50 gallons
December 30, 2012	Horizone Avenue	100 gallons
January 4, 2013	Mt. Rainier Drive, NE	50 gallons
January 4, 2013	7th st. & Candelaria	100 gallons
January 4, 2013	Spanish Bit Street, NE	1,000 gallons
January 10, 2013	Las Casitas Drive, NE	50 gallons
January 12, 2013	Georgia & Summer Avenue, NE	500 gallons
January 12, 2013	Layton Avenue, NE	1,000 gallons
January 13, 2013	Central Avenue, NW	50 gallons
January 15, 2013	Chelwood & Palo Duro, NE	50 gallons
January 15, 2013	Boradway	150,000 gallons
January 16, 2013	Yale & Kathryn, SE	100 gallons
January 17, 2013	Pan American, NE	1,000 gallons
January 18, 2013	Edith, NE	1,330 gallons
January 19, 2013	Pickard Avenue, NE	50 gallons
January 20, 2013	Pan American Freeway West, NE	500 gallons
January 24, 2013	Cochiti Road, SE	500 gallons
February 1, 2013	Kathryn Ave, SE	100 gallons
February 1, 2013	Zimmerman Ave, SE	100 gallons
February 3, 2013	Indian School Rd & Rita Drive, NE	Unknown
February 4, 2013	Zuni & Palomas, SE	50 gallons
February 4, 2013	Juan Tabo & Lomas Blvd, NE	500 gallons
February 6, 2013	Carlisle, NE	100 gallons
February 11, 2013	Indian School & Broadway, NE	100 gallons
February 16, 2013	Montano, NW	50 gallons
February 22, 2013	Overflow at plant	1,000 gallons
February 22, 2013	Skyline, NE	500 gallons
March 2, 2013	Caynon View, NE	500 gallons
March 4, 2013	Copper & Camino del Norte, NE	500 gallons
March 6, 2013	Ponderosa Avenue, NE	100 gallons
March 9, 2013	Del Monte Trail, SW	50 gallons
March 12, 2013	Morris Street & Montgomery, NE	1,000 gallons
March 14, 2013	Pan American Frontage Rd.	500 gallons
March 19, 2013	Central Avenue, SE	Unknown
March 23, 2013	Edith, NE	50 gallons

Attachment C
Unauthorized Discharges

Date	Location	Volume
April 11, 2013	Acoma Rd. & Conchas St., SE	1,000 gallons
April 17, 2013	Montgomery, NE	50 gallons
April 26, 2013	Ridgecrest, SE	50 gallons
May 2, 2013	Pino Avenue, NE	Unknown
May 7, 2013	Monte Alto Place, NE	Unknown
May 15, 2013	America's Parkway	360 gallons
May 28, 2013	Spense	60 gallons
June 5, 2013	Aztec	300 gallons
June 10, 2013	Stage Coach	410 gallons
June 13, 2013	Lobo Place, NE	20 gallons
June 26, 2013	65th St.	255 gallons
July 12, 2013	Woodward	500 gallons
July 19, 2013	Roma & Guaymas	200 gallons
July 26, 2013	Eubank & Montgomery	3,000 gallons
August 2, 2013	Los Picaros Road	1,315 gallons
August 5, 2013	Los Picaros Road	150 gallons
August 19, 2013	Barstow & Holly Ave	200 gallons
August 23, 2013	Four Hills	680 gallons
August 23, 2013	Montgomery	1,500 gallons
September 2, 2013	Don Luis	3,725 gallons
September 9, 2013	Easy	200 gallons
September 17, 2013	Montgomery	7,500 gallons
September 25, 2013	ABCWUA (onsite)	5,000 gallons
September 26, 2013	Palm Springs	70 gallons
September 26, 2013	Juan Tabo & Candelaria	260 gallons
October 6, 2013	Summit Ave	1,275 gallons
October 15, 2013	Padeo del Norte & Channel	50 gallons
October 17, 2013	Delicado	50 gallons
October 21, 2013	2nd Street	40 gallons
October 28, 2013	2nd Street	250 gallons
November 9, 2013	Candlelight	13,100 gallons
November 16, 2013	Graceland & Hoyle	100 gallons
November 20, 2013	Tramway	150 gallons
November 21, 2013	Central	500 gallons
November 23, 2013	Bellamah & Monte Largo	250 gallons
November 23, 2013	Menaul	2,500 gallons
November 27, 2013	Blue Feather & Lyons	3,300 gallons
December 1, 2013	Del Mastro	15 gallons
December 11, 2013	Central & Mullberry	100 gallons
December 14, 2013	La cueva	6,250 gallons
December 16, 2013	La Corrida	2 gallons
December 19, 2013	Luchetti Road	4,488 gallons

Attachment C
Unauthorized Discharges

Date	Location	Volume
December 20, 2013	Gladden/Pennsylvania	500 gallons
January 8, 2014	Arno	550,000 gallons
January 9, 2014	Mountain View	625 gallons
January 9, 2014	Indian School Road	5,350 gallons
January 30, 2014	Carlisle, NE	3,975 gallons
February 19, 2014	Wyoming	100 gallons
March 4, 2014	Lomas & University	500 gallons
March 5, 2014	Iron & Elm	500 gallons
March 8, 2014	Iron	100 gallons
March 12, 2014	Cibola Village	125 gallons
March 25, 2014	Constitution & Stamford	50 gallons
April 10, 2014	Comamche	31,500 gallons
April 11, 2014	Elizabethh & Menaul	220 gallons
April 25, 2014	Golf Course	7,500 gallons
April 25, 2014	Golf Course &McMahon	500 gallons
April 27, 2014	Georgia & University	85 gallons
April 30, 2014	Broadway	20 gallons
May 9, 2014	Harper	100 gallons
May 14, 2014	Jefferson & Montgomery	735 gallons
May 15, 2014	Sagewood	1,500 gallons
May 15, 2014	Juan Tabo & Lomas	325 gallons
June 8, 2014	Lyon	18,000 gallons
June 10, 2014	Lomas & Nakomis	500 gallons
June 19, 2014	Paradise & University	75 gallons
September 4, 2014	Tracy and El Solindo	4,000 gallons
September 13, 2014	Almeda	200 gallons
September 16, 2014	Almeda	40 gallons
September 19, 2014	Southside Water Reclamation Plant	1,000 gallons
September 28, 2014	Elizabeth and Prospect	50 gallons
October 13, 2014	Conchas and Cochiti, SE	10 gallons
October 27, 2014	Prospect Ave., NE	60 gallons
October 30, 2014	La Veta Rd., NE	100 gallons
November 7, 2014	Danube, NE	275 gallons
November 11, 2014	Bethel Ave., SE	25 gallons
January 16, 2015	5100 Indian School, NE	40 gallons
January 17, 2015	10410 Santa Susanna Rd., NE	25 gallons
January 27, 2015	2350 Alamo Ave., SE	125 gallons
January 27, 2015	1000 Central, NE	80 gallons
January 28, 2015	Bluefeather/Lyons Blvd., NW	6,462 gallons
February 7, 2015	4411 Canyon Ct., NE	50 gallons
February 12, 2015	14217 Turner CT., NE	210 gallons
February 15, 2015	517 Dolores Dr., SW	50 gallons

Attachment C

Unauthorized Discharges

Date	Location	Volume
February 27, 2015	4201 Second Street SW	6,000,000 gallons

Appendix 9 Response to Administrative Complaint

For clarity, only the portions related to the Collection Section are attached.

Albuquerque Bernalillo County
Water Utility Authority

PO Box 568
Albuquerque, NM 87103
505-289-3000
www.abcwua.org

July 14, 2015

Mr. John Blevins
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

VIA USPS MAIL: CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Subject: Response to Administrative Complaint
Docket Number: CWA-06-2015-1777
NPDES Permit Number: NM0022250

Dear Director Blevins:

The Albuquerque Bernalillo County Water Utility Authority (Water Authority) received the referenced Administrative Complaint (Complaint) on June 15, 2015. In accordance with paragraphs 24 and 29 of the Complaint, the Water Authority has filed a timely Answer to the Complaint and included a request for hearing therein. The Answer to the Complaint is included in Attachment 1.

However, prior to any hearing, the Water Authority would like to schedule an informal settlement conference with Robert Houston and other representatives from your office concerning the allegations and the proposed penalty. The primary topics we wish to discuss are as follows: the extensive corrective and remedial action Water Authority has taken in response to each previous violation; corrections needed to address apparent errors in both the number and severity of past violations recited in the Complaint; and the penalty proposed, which we believe is overly harsh and unnecessarily punitive given the Water Authority's proactive approach to compliance with its NPDES permit responsibilities. At the informal settlement conference, we will propose a set of corrective actions in accordance with our previous commitments towards improving the Southside Wastewater Reclamation Plant ("SWRP") in compliance with Administrative Order CWA-06-2015-1733.

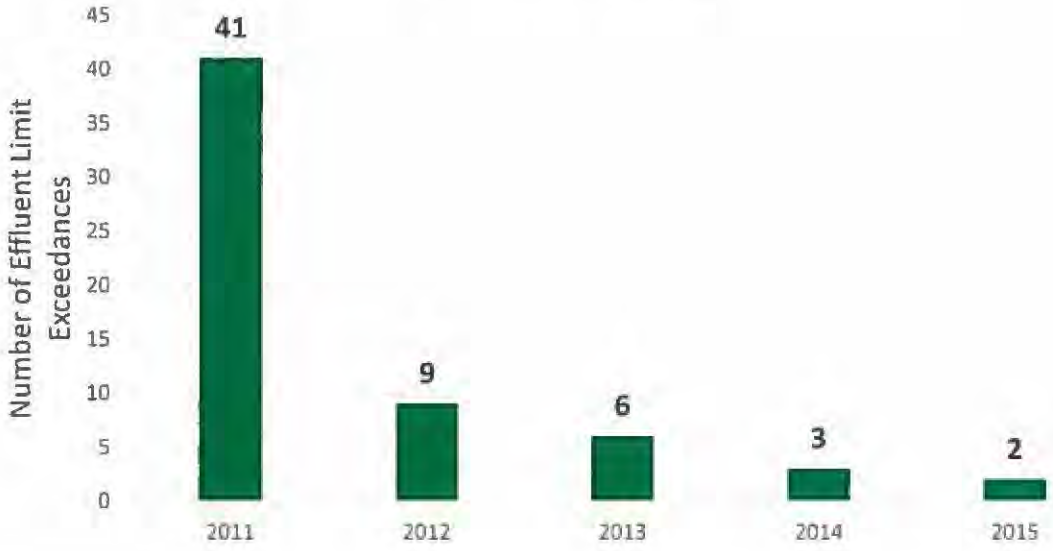
WATER AUTHORITY CORRECTIVE ACTIONS SINCE 2011

On July 12, 2011, Water Authority staff, including myself, met with Robert Houston and many other enforcement and legal staff from Region 6 to discuss effluent violation issues at the SWRP. At that time, the Water Authority committed to rebuilding and rehabilitating the wastewater treatment plant. In addition, we committed to update our process control using the BioWin software, improve our training programs and increase the management efforts towards consistent completion of periodic maintenance. We committed to spend $250 million over ten years for extensive improvements knowing that rebuilding the plant while continuing to operate and maintain permit compliance is difficult. To date, we have spent more than $60 million including, but not limited to, final clarifier and aeration basin improvements, blower improvements, and the new Preliminary Treatment Facility (PTF).

As a follow-up to our meeting on July 2011, the Water Authority again met with Mr. Houston in Dallas in October 29, 2014 to discuss the progress made in regards to previous Administrative Orders and illustrate current and future improvement projects. Since 2011, effluent performance of the SWRP has greatly improved. Attachment 2 shows the number of effluent violations at the SWRP by analyte and year. The last full year, 2014, represents a 92% decrease in effluent violations compared to 2011. While we are pleased with the progress, we understand and are committed to increasing our efforts towards eliminating effluent violations all together.

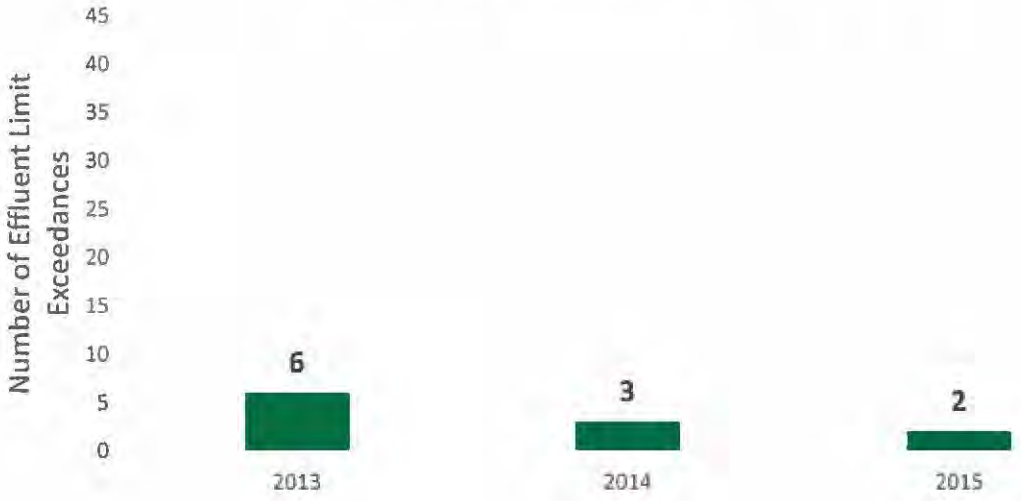
Despite the issuance of a more stringent effluent limits in the NPDES permit issued in October of 2012, effluent violations have continued to trend downward. There have been only 11 effluent violations since the issuance of the new NPDES permit, which is less than a quarter of the total violations in 2011. The Water Authority has not had any permit exceedances in 2015 for Chlorine, Total Inorganic Nitrogen, Mercury, Ammonia, or Total Suspended Solids. Figure 1 depicts the decrease in effluent violations since 2011.

Figure 1 - NPDES Compliance (All Parameters)
CY 2011 through 2015



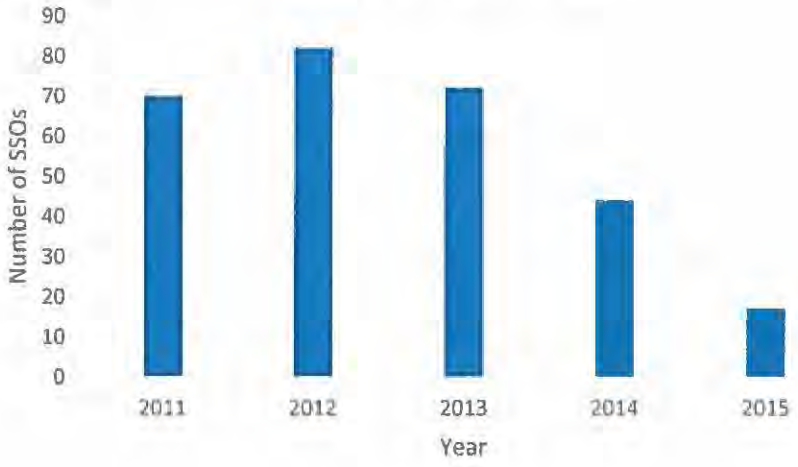
On the following page is Figure 2, which shows the number of violations since the reissuance of the NPDES permit in 2012. This graphic shows clearly that we have made significant progress reducing effluent violations, although we realize that we have more room for improvement.

Figure 2 - NPDES Compliance (All Parameters)
October 1, 2012 through 2015



With more than 2,500 miles of collections and interceptors, Sanitary Sewer Overflows (SSO's) continue to occur in the collection system. However, Figure 3 below identifies that the overall number of SSO events in the collection system is also decreasing over time. The Water Authority is actively working to reduce SSO's with new programs (root foaming and FOG buster additive) and establishing a dedicated SSO committee to study the cause of each SSO. We have instituted a Capacity Maintenance, Operation and Management (CMOM) program which we believe with further reduce the amount of SSO's.

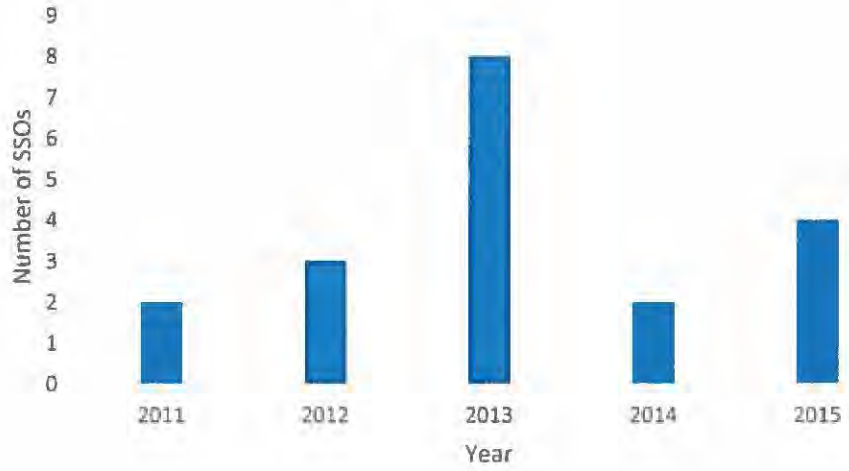
Figure 3 - Collection System SSO's
CY 2011 to 2015



Collection system SSOs are captured prior to reaching the Rio Grande and we have developed and implemented plans working with the City, AMAFCA, and Bernalillo County to address these operations. When an SSO occurs, the downstream storm drainage is blocked and then these SSOs are, pumped, treated with chlorine, and washed down. To date, none of these SSOs result in wastewater reaching the Rio Grande.

The Water Authority is also trying to prevent overflows at the SWRP. Figure 4 identifies the number of SSO's at the SWRP between 2011 and February 2015. Most of the SSO's are captured on-site and are treated. In order to eliminate SSOs at the SWRP from reaching the Rio Grande, the Water Authority has either completely plugged the storm water outfalls with concrete or built a large earthen dam in front of them. Water Authority staff is working on the design of two storm/spill retention basins: one on the north side and another on the south side of the plant site. When complete, all runoff will be detained and pumped back to the head of the plant thereby eliminating the need for future storm water discharge points. The drainage ponds will also provide on-site storage in the event of a major power failure to provide on-site containment to prevent overflows leaving the plant property. All of these improvements will be complete by the December 2015 in accordance with the Administrative Order CWA-06-2015-1752.

Figure 4 – SWRP SSO's
CY 2011 to 2015



Only two overflows from the SWRP from 2011 until 2015 have resulted in discharges to the Rio Grande. All others have been successfully captured, pumped and treated. The most recent SSO, however, which was caused by a power surge, resulted in a significant quantity of primary effluent reaching the river and we have committed to eliminate that possibility from happening again. We have two Administrative Orders to complete specific actions and provided our first progress report at the end of June 2015.

With respect to the Complaint, the Water Authority has the following comments:

THE COMPLAINT RESTATES PREVIOUS ERRONEOUS ALLEGATIONS

Finding 9. ***"Part I.A. of the permit places certain limitations on the quality and quantity of effluent discharged by Respondent. The relevant discharge limitations are specified in Attachment A."***

Response: Attachment A contains a partial list of the Limitations and Monitoring Requirements of the National Pollutant Discharge Elimination System (NPDES) permit effective May 1, 2005 – September 30, 2012. A copy of the Limitations and Monitoring Requirements from the current NPDES permit, effective October 1, 2012, is attached for reference (Attachment 3).

Finding 10. ***"Certified DMRs filed by Respondent with EPA in compliance with the permit show discharges of pollutants from the facility that exceed the permitted effluent limitations established in Part I.A. of the permit, as specified in Attachment B.***

Response: Attachment B – Effluent Violations is a list of 49 effluent violations occurring from January 1, 2011 through November 30, 2014. The Water Authority has provided responses regarding most of the listed violations in responses to Administrative Orders dated July 2, 2013 and September 3, 2014 (Attachments 4 and 5, respectively).

The 18 violations listed for "Biochemical Oxygen Demand, 5-Day, 30-Day Average" from October 31, 2012 through May 31, 2014 were generated based on a typographical error in the NPDES permit. The loading limitation was listed as 709 pounds per day (lbs/day) cBOD. Per our request, EPA Region 6 modified the permit on December 1, 2014 and revised the limit to 9,508 lbs/day cBOD. In December 2014, the Water Authority submitted revised DMRs from October 2012 – October 2014. These violations were removed from the EPA Enforcement Compliance History Online (ECHO) database in early 2015.

Regarding the violation for "Mercury, Total Daily Maximum" noted for October 31, 2012, an amended October 2012 DMR was submitted to EPA in June 2013. The Water Authority followed EPA guidance for the analytical method (EPA Method 1631) that allowed for blank correction. This violation has been removed from the EPA ECHO database. The list also included the July 2011 daily maximum ammonia nitrogen violation twice.

In addition, the list included only the violations of the greatest magnitude. There were 24 other violations reported to EPA from January 2011 – December 2011, nine (9) other violations reported to EPA from January 2012 – August 2012, and one (1) violation reported to EPA in January 2015. Attachment 6 contains corrections to the list of effluent violations.

Finding 11. ***Sanitary Sewer Overflow ("SSO") bypass reports filed by Respondent with EPA in compliance with the permit show unauthorized discharges. The unauthorized discharges are specified in Attachment C.***

Response: Attachment C - Unauthorized Discharges is list of overflows from the sanitary sewer or on the SWRP Plant site that occurred from January 1, 2011 to February 28, 2015.

The Water Authority reviewed the Unauthorized Discharges listed in Attachment C. Attachment 7 identifies the discrepancies. There are 10 SSOs in Attachment C that need to be removed due to duplication. There are 140 unauthorized discharges that should be added to Attachment C.

THE WATER AUTHORITY REMAINS COMMITTED TO CONTINUOUS IMPROVEMENT

We believe that the proposed penalty is unnecessarily punitive because the Water Authority is already designing and constructing further improvements to the wastewater treatment plant. Projects under study and design include biological nutrient removal monitoring systems, anaerobic digester renewal, dissolved air flotation systems, blower filtration systems, new anaerobic digesters and new primary clarifiers. These improvements are outlined in Administrative Order CWA-06-2015-1733 and the Revised Corrective Action Plan submitted in May 2014 (Attachment 8).

Since 2011, the Water Authority has committed itself to and has shown improving compliance with our NPDES permit. The Water Authority realizes that this goal is not yet complete, but will continue to work to eliminate permit violations. The Water Authority has requested a meeting with EPA to discuss the allegations in the Complaint and to discuss ongoing compliance issues.

Please contact me at (505) 289-3150 or jstomp@abcwua.org if you have any questions or need additional information.

Sincerely,

John M. Stomp III, P.E.
Chief Operating Officer

cc: Robert Houston, EPA Region 6, Compliance Assurance and Enforcement Division
Ellen Chang-Vaughan, EPA Attorney (6RC-EW)
Bruce Yurdin, New Mexico Environment Department

Attachments:

1. Water Authority's Answer to the Administrative Complaint
2. Exceedances of Effluent Limits Graphs
3. Effluent Limitations and Monitoring Requirements for NPDES permit (NM0022250) effective October 1, 2012
4. July 2, 2013 Response to AO Letter
5. September 3, 2014 Response to AO Letter, sans attachments
6. List of Effluent Violations (January 2011 – November 2014) – Revised
7. Unauthorized Discharges (January 2011 – February 2015) – Revised
8. Revised Corrective Action Plan, Southside Water Reclamation Plant, May 2014

Attachment 7

Unauthorized Discharges (January 2011 – February 2015) – Revised

Attachment 7 Unauthorized Discharges – Revised

Date	Location	Volume	Comments
January 1, 2011	Montano & 4th Street, NW Storm sewer	500 gallons	223 Montano Rd NW
January 3, 2011	10300 Golf Course Rd. NW	500 gallons	
February 4, 2011	1535 Larkin Rd. SW	100 gallons	
February 16, 2011	8001 Mountain Rd.	500 gallons	
February 18, 2011	Candelaria & Morris, NE Street & Storm sewer	100 gallons	10308 Candelaria & Morris
~~March 5, 2011~~	~~10308 Candeleria & Morris Rd.~~	~~100 gallons~~	Duplicate of above
March 5, 2011	9180 Coors Blvd.	1,000 gallons	
March 14, 2011	Kathryn & Dickerson	100 gallons	
March 19, 2011	Westgate & Detitum Busin	1,000 gallons	
March 19, 2011	64th & Bluewater	~~1,000~~ 100 gallons	
March 20, 2011	2420 Comanche Ave.	1,000 gallons	
~~March 21, 2011~~	~~2420 Comanche Rd. NE~~	~~500 gallons~~	Duplicate of above
~~March 21, 2011~~	~~West Gate & Detitum Busin SW~~	~~1,000 gallons~~	Duplicate of above
March 25, 2011	2205 Broadway Blvd. SE	500 gallons	
March 26, 2011	Pennsylvania & Rhode Island, SE Street	100 gallons	
March 27, 2011	2820 Jessie James Rd.	500 gallons	
March 28, 2011	Mojave St., NW Street	100 gallons	6460 Mojave Street NW
March 28, 2011	Bluewater & 64th St., NW Street & Storm sewer	100 gallons	63rd & Bluewater NW
~~March 28, 2011~~	~~Pennsylvania & Rhode Island~~	~~100 gallons~~	Duplicate of above
~~March 28, 2011~~	~~2820 Jesse James Dr.~~	~~500 gallons~~	Duplicate of above
April 5, 2011	Cathy Ave., NE Storm sewer & Arroyo	500 gallons	6324 Cathy Ave NE
April 14, 2011	Broadway Blvd & Avenida Cesar Chavez Street	1,000 gallons	914 Broadway Blvd SE
April 19, 2011	Broadway Blvd & Avenida Cesar Chavez Street	1,000 gallons	
May 7, 2011	2921 General Stillwell St.	100 gallons	
May 9, 2011	San Diego Ave., NE Street	100 gallons	8620 San Diego Ave.

Date	Location	Volume	Comments
~~May 10, 2011~~	~~8620 San Diego Ave.~~	~~100 gallons~~	Duplicate of above
May 12, 2011	Candaleria & Pitt Street & Storm sewer	100 gallons	
May 14, 2011	Columbus Circle, NW Golf Course	500 gallons	9906 Columbus Circle NW
~~May 18, 2011~~	~~9906 Columbus Cir.~~	~~500 gallons~~	Duplicate of above
June 7, 2011	5828 Avenida La Barrance	500 gallons	
June 10, 2011	Montgomery & Carlisle Street & Arroyo	500 gallons	
July 5, 2011	University & Sunport, SE Storm sewer	100 gallons	
July 11, 2011	University and Sunport, SE Street & Storm sewer	500 gallons	
August 21, 2011	San Pedro & Topke, NE Street	500 gallons	
August 21, 2011	Outfall 001	10,000 gallons	"<10,000 gallons" was reported.
August 25, 2011	Outfall 001	10,000 gallons	Reported to EPA but not included in Attachment C
September 13, 2011	7521 Menaul Blvd.	500 gallons	
October 3, 2011	Sunport & I-25 Storm sewer & Arroyo	1,000 gallons	
~~October 3, 2011~~	~~Sun Port & I-25~~	~~10,000 gallons~~	Duplicate of above
November 12, 2011	1001 Louisiana	500 gallons	
November 18, 2011	4710 San Mateo Blvd.	500 gallons	
November 24, 2011	Blumenshine & Roseberry	~~10,000~~ 1,000 gallons	
November 24, 2011	Layton Ave. NE	1,000 gallons	9201 Layton Avenue NW
December 8, 2011	64th & Bluewater, NW Street & Storm sewer	500 gallons	
December 10, 2011	64th & Bluewater, NW Street & Storm sewer	500 gallons	Reported to EPA but not included in Attachment C
December 24, 2011	Blumenshine & Roseberry, SW Yard & Dirt lot	1,000 gallons	
December 31, 2011	Blumenshine & Roseberry, SW Open lot	1,000 gallons	
January 3, 2012	Rio Puerco Trail, SW Park	500 gallons	10500 Rio Puerco Trail SW
January 3, 2012	110 Altez	100 gallons	
January 12, 2012	SWRP Septage Spill	<200 gallons	Reported to EPA but not included in Attachment C

Date	Location	Volume	Comments
January 14, 2012	Claremont Ave., NE Street	500 gallons	
January 14, 2012	64th & Bluewater, NW Street & Storm sewer	~~100~~500 gallons	
January 23, 2012	Griegos Rd, NW Street & Parking Lot	500 gallons	417 Griegos Rd NW
~~January 23, 2012~~	~~417 Griegos~~	~~101 gallons~~	Duplicate of above
January 25, 2012	Nassau Dr., NE Street	500 gallons	11523 Nassau Dr. NE
~~January 25, 2012~~	~~11523 Nassau Dr.~~	~~101 gallons~~	Duplicate of above
January 29, 2012	2469 Corrals Rd.	1,000 gallons	Corrales Rd. NW
February 9, 2012	2309 Luchetti	1,000 gallons	
February 17, 2012	Sun Port & Yale Blvd.	100 gallons	
February 19, 2012	10323 Chandler Dr.	100 gallons	
February 27, 2012	915 Broadway Blvd.	1,000 gallons	
March 7, 2012	Osuna Road, NE Street	100 gallons	6051 Osuna Road NE
March 10, 2012	Riverview Drive, NW Storm sewer	100 gallons	1200 Riverview Drive SW
March 25, 2012	Orfero Trail, NW Arroyo & Street	~~100~~ 500 gallons	6316 Orfero Trail NW
April 5, 2012	Tramway Terrace Loop, NE Street	1,000 gallons	1830 Tramway Terrace Loop NE
April 8, 2012	Juan Tabo Blvd., NE Street & Storm Sewer	1,000 gallons	2925 Juan Tabo Blvd. NE
April 19, 2012	Four Hills Rd & Pinon Creek Arroyo	500 gallons	
April 22, 2012	Mary Ellen St & Aspen Avenue Street	1,000 gallons	
April 25, 2012	Mary Ellen Street Street & storm sewer	1,000 gallons	1203 Mary Ellen Street NE
April 25, 2012	Spence Ave., SE Street	500 gallons	704 Spence Avenue SE
May 19, 2012	Sevilla Avenue, NW Arroyo	1,000 gallons	5401 Sevilla Avenue NW
May 22, 2012	Montgomery Blvd., NE Street & storm sewer	1,000 gallons	6500 Montgomery Blvd. NE
May 26, 2012	Jade park Ave. & Ray Street, NE Street	500 gallons	
May 29, 2012	Eastridge Drive., NE Street	500 gallons	1605 Eastridge Drive
June 23, 2012	Irving & Rainbow, NW Street	100 gallons	

Date	Location	Volume	Comments
June 28, 2012	Eubank Blvd., NE Street	100 gallons	113 Eubank Blvd. NE
July 2, 2012	SWRP Onsite Overflow	1000 gallons	Reported to EPA but not included in Attachment C
July 7, 2012	Lafayette Drive, NE Arroyo	500 gallons	3401 Lafayette Drive
July 25, 2012	Taylor Ranch Road, NW Street	500 gallons	5601 Taylor Ranch Road NW
July 29, 2012	Wyoming & Comache, NE Street	100 gallons	
August 1, 2012	Hidden Valley Drive, SE Street	500 gallons	13104 Hidden Valley Drive SE
October 6, 2012	Coors Blvd., NW	500 gallons	1401 Coors Blvd NW
October 17, 2012	Lakeview Place, SW	500 gallons	4320 Lakeview Place SW
October 26, 2012	Iron Street, SE	50 gallons	714 Iron Avenue SE
October 29, 2012	San Joaquin Ave, SE	500 gallons	2738 San Joaquin Avenue SE
October 29, 2012	Richmond Drive, SE	100 gallons	1204 Richmond Drive SE
November 1, 2012	Richmond Drive, SE	100 gallons	1200 Richmond Drive
November 3, 2012	Juan Tabo, NE	500 gallons	528 Juan Tabo NE
November 12, 2012	Kathryn Ave, SE	~~Unknown~~50 gallons	217 Kathryn Avenue SE
November 12, 2012	Septage Spill - SWRP Septage Site	20 gallons	
November 16, 2012	Willow Ct., SE	~~Unknown~~ 1,000 gallons	
December 3, 2012	Lead Avenue	~~50~~ 1,000 gallons	608 Willow Ct SE
December 8, 2012	Stagecoach Lane, SE	50 gallons	Lead Avenue & University Blvd
December 17, 2012	Coal / I-25	50 gallons	1424 Stagecoach Lane SE
December 19, 2012	Burmuda & Vienna, NE	100 gallons	
December 20, 2012	Lomas Verde Avenue, NE	50 gallons	
December 30, 2012	Horizone Avenue	100 gallons	13205 Lomas Verde Avenue NE
January 4, 2013	Mt. Rainier Drive, NE	50 gallons	8814 Horizon Blvd NE
January 4, 2013	7th st. & Candelaria	100 gallons	3737 Mt. Rainer Drive NE
January 4, 2013	Spanish Bit Street, NE	~~1,000~~ 50 gallons	

Date	Location	Volume	Comments
January 10, 2013	Las Casitas Drive, NE	50 gallons	4200 Spanish Bit Street NE
January 12, 2013	Georgia & Summer Avenue, NE	500 gallons	10243 Las Casitas Drive NE
January 12, 2013	Layton Avenue, NE	1,000 gallons	9215 Layton Avenue NE
January 13, 2013	Central Avenue, NW	50 gallons	2437 Central Avenue NW
January 15, 2013	Chelwood & Palo Duro, NE	50 gallons	
January 15, ~~2013~~ 2014	Boradway	~~150,000~~ 61,674 gallons	915 Broadway Blvd. NE. SSO occurred in 2014.
January 16, 2013	Yale & Kathryn, SE	100 gallons	
January 17, 2013	Pan American, NE	1,000 gallons	4741 Pan American NE
January 18, ~~2013~~ 2014	Edith, NE	1,330 gallons	920 Edith Road SE. SSO occurred in 2014.
January 19, 2013	Pickard Avenue, NE	50 gallons	7708 Pickard Avenue NE
January 20, 2013	Pan American Freeway West, NE	500 gallons	4712 Pan American Freeway West NE
January 24, 2013	Cochiti Road, SE	500 gallons	6500 Cochiti Road SE
February 1, 2013	Kathryn Ave, SE	100 gallons	2400 Kathryn Avenue SE
February 1, 2013	Zimmerman Ave, SE	100 gallons	6118 Zimmerman Avenue NE
February 3, 2013	Indian School Rd & Rita Drive, NE	~~Unknown~~100 gallons	
February 4, 2013	Zuni & Palomas, SE	50 gallons	
February 4, 2013	Juan Tabo & Lomas Blvd, NE	500 gallons	
February 6, 2013	Carlisle, NE	100 gallons	2103 Carlisle Blvd NE
February 11, 2013	Indian School & Broadway, NE	100 gallons	
February 16, 2013	Montano, NW	50 gallons	218 Montano NW
February 22, 2013	Overflow at plant	1,000 gallons	
February 22, 2013	Skyline, NE	500 gallons	13701 Skyline NE
March 2, 2013	Caynon View, NE	500 gallons	109 Canyon View Pl NE
March 4, 2013	Copper & Camino del Norte, NE	500 gallons	

Date	Location	Volume	Comments
March 6, 2013	Ponderosa Avenue, NE	100 gallons	4512 Ponderosa Avenue NE
March 9, 2013	Del Monte Trail, SW	50 gallons	1300 Del Monte Trial SW
March 12, 2013	Morris Street & Montgomery, NE	1,000 gallons	
March 14, 2013	Pan American Frontage Rd.	500 gallons	Pan American Frontage Rd. & Bogan NE
March 19, 2013	Central Avenue, SE	~~Unknown~~500 gallons	3600 Central Avenue SE
March 23, 2013	Edith, NE	50 gallons	4200 Edith NE
April 11, 2013	Acoma Rd. & Conchas St., SE	1,000 gallons	
April 17, 2013	Montgomery, NE	50 gallons	3520 Montgomery NE
April 26, 2013	Ridgecrest, SE	50 gallons	2811 Ridgecrest Dr SE
May 2, 2013	Pino Avenue, NE	~~Unknown~~ 8,000 gallons	6501 Pino Avenue SE
May 7, 2013	Monte Alto Place, NE	~~Unknown~~3,750 gallons	175 Monte Largo Pl NE in Maximo
May 7, 2013	SWRP Onsite Overflow	<50	Reported to EPA but not included in Attachment C
May 7, 2013	SWRP Onsite Overflow	<200	Reported to EPA but not included in Attachment C
May 15, 2013	America's Parkway	360 gallons	2121 Americas Parkway NE
May 28, 2013	Spense	60 gallons	1521 Spence Avenue SE
June 5, 2013	Aztec	300 gallons	6219 Aztec Road NE
June 10, 2013	Stage Coach	410 gallons	1316 Stagecoach Lane SE
June 10, 2013	SWRP Onsite Overflow	3000 gallons	Reported to EPA but not included in Attachment C
June 13, 2013	Lobo Place, NE	20 gallons	1336 Lobo Place NE
June 26, 2013	65th St.	255 gallons	65th St. B/W Churchill & Gonzales SW
July 12, 2013	Woodward	500 gallons	700 Woodward SE
July 19, 2013	Roma & Guaymas	200 gallons	801 Guaymas Pl NE
July 26, 2013	Eubank & Montgomery	3,000 gallons	
August 2, 2013	Los Picaros Road	1,315 gallons	3512 Los Picaros Road
August 5, 2013	Los Picaros Road	150 gallons	3617 Los Picaros Road

Date	Location	Volume	Comments
August ~~19~~18, 2013	Barstow & Holly Ave	200 gallons	
August 23, 2013	Four Hills	680 gallons	903 Four Hills Rd SE
August 23, 2013	Montgomery	1,500 gallons	7017 Montgomery Blvd NE
September 2, 2013	Don Luis	3,725 gallons	Don Luis Road & Atrisco Drive SW
September 5, 2013	SWRP Onsite Overflow	30 gallons	Reported to EPA but not included in Attachment C
September 9, 2013	Easy	200 gallons	10617 Easy Street NW
September 17, 2013	Montgomery	7,500 gallons	3541 Montgomery NE
September 25, 2013	ABCWUA (onsite)	5,000 gallons	Revised reports updated amount to: 3.8 MG onsite 6170 gal. offsite
September 26, 2013	Palm Springs	70 gallons	11716 Palm Springs Avenue NE
September 26, 2013	Juan Tabo & Candelaria	260 gallons	
October 6, 2013	Summit Ave	1,275 gallons	1116 Summit Avenue NE
October 15, 2013	Padeo del Norte & Channel	50 gallons	
October 17, 2013	Delicado	50 gallons	10316 Delicado Place NE
October 21, 2013	2nd Street (SSO)	40 gallons	1715 2nd St. SW.
October 28, 2013	2nd Street (SWRP)	250 gallons	
November 9, 2013	Candlelight	13,100 gallons	3300 Candlelight Drive NE
November 16, 2013	Graceland & Hoyle	100 gallons	
November 16, 2013	SWRP Onsite Overflow	50 gallons	Reported to EPA but not included in Attachment C
November 19, 2013	Claremont & Palomas NE	73 gallons	Reported to EPA but not included in Attachment C
November 20, 2013	Tramway	150 gallons	901 Tramway Blvd. NE
November 21, 2013	Central	500 gallons	1001 Central Ave. NE/North Alley
November 23, 2013	Bellamah & Monte Largo	250 gallons	
November 23, 2013	Menaul	2,500 gallons	12117 Menaul Blvd. NE

Date	Location	Volume	Comments
November 27, 2013	Blue Feather & Lyons	3,300 gallons	
December 1, 2013	Del Mastro	15 gallons	1108 Del Mastro Drive SW
December 11, 2013	Central & Mullberry	100 gallons	
December 14, 2013	La cueva	6,250 gallons	14332 La Cueva Avenue NE
December 16, 2013	La Corrida	2 gallons	5613 La Corrida Road NE
December 19, 2013	Luchetti Road	4,488 gallons	2309 Luchetti Road SW
December 20, 2013	Gladden/Pennsylvania	500 gallons	7517 Gladden/ Pennsylvania NE
January 8, 2014	Arno	~~550,000~~ 61,550 gallons	903 Arno Street NE
January 9, 2014	Mountain View	625 gallons	13405 Mountain View Avenue NE
January 9~~1~~9, 2014	Indian School Road	5,350 gallons	3310 Indian School Rd NE
January 30, 2014	Carlisle, NE	3,975 gallons	Carlisle & Montgomery NE
February 19, 2014	Wyoming	100 gallons	7121 Wyoming Blvd. NE
March 4, 2014	Lomas & University	500 gallons	11824 Lomas Blvd. NE
March 5, 2014	Iron & Elm	500 gallons	
March 8, 2014	Iron	100 gallons	712 Iron Avenue SE
March 12, 2014	Cibola Village	125 gallons	4200 Cibola Village Drive NE
March 25, 2014	Constitution & Stanford	50 gallons	
April 10, 2014	Comanche	31,500 gallons	2401 Comanche Road NE
April 11, 2014	Elizabeth & Menaul	220 gallons	
April 25, 2014	Golf Course	7,500 gallons	10501 Golf Course NW
April 25, 2014	Golf Course &McMahon	500 gallons	
April 27, 2014	Georgia & University	85 gallons	
April 30, 2014	Broadway	20 gallons	904 Broadway NE
May 9, 2014	Harper	100 gallons	5901 Harper NE
May 14, 2014	Jefferson & Montgomery	735 gallons	4404 Montgomery Blvd. NE

Date	Location	Volume	Comments
May 15, 2014	Sagewood	1,500 gallons	701 Sagewood Ct. SE
May 15, 2014	Juan Tabo & Lomas	325 gallons	770 Juan Tabo Blvd. NE
June 8, 2014	Lyon	18,000 gallons	9607 Lyon Rd. NW
June 10, 2014	Lomas & Nakomis	500 gallons	1001 Nakomis Dr. NE
June 19, 2014	Paradise & University	75 gallons	10000 Vivald Rd. NW
July 8, 2014	4200 Luecking Park Avenue NE	1200 gallons	Reported to EPA but not included in Attachment C
July 8, 2014	1135 Corrales Rd. NW	1500 gallons	Reported to EPA but not included in Attachment C
July 11, 2014	Carlisle and Indian School Blvd. NE	700 gallons	Reported to EPA but not included in Attachment C
July 11, 2014	9601 Lyons Rd. NW	12,473 gallons	Reported to EPA but not included in Attachment C
July 20, 2014	Blue Feather & Lyons Blvd. NW	10,846 gallons	Reported to EPA but not included in Attachment C
July 30, 2014	11409 Appian Way NE	52 gallons	Reported to EPA but not included in Attachment C
August 2, 2014	San Francisco & Louisiana NE	2,625 gallons	Reported to EPA but not included in Attachment C
August 2, 2014	10800 Corrales Rd. NW	5,250 gallons	Reported to EPA but not included in Attachment C
September 4, 2014	Tracy and El Solindo	4,000 gallons	
September 13, 2014	5980 Almeda	200 gallons	5980 Alameda Blvd. NE
September 16, 2014	5995 Almeda	40 gallons	5995 Alameda Blvd. NE
September 19, 2014	Southside Water Reclamation Plant	1,000 gallons	
September 28, 2014	Elizabeth and Prospect	50 gallons	10412 Prospect Avenue NE
October 13, 2014	Conchas and Cochiti, SE	10 gallons	
October 27, 2014	Prospect Ave., NE	60 gallons	12312 Prospect Avenue NE
October 30, 2014	La Veta Rd., NE	100 gallons	2800 La Veta Dr. NE
November 7, 2014	Danube, NE	275 gallons	4700 Danube Drive NE

Date	Location	Volume	Comments
November 11, 2014	Bethel Ave., SE	25 gallons	612 Bethel Ave. SE
November 30, 2014	SWRP Onsite Overflow	200 gallons	Reported to EPA but not included in Attachment C
December 20, 2014	Hendrix Ave. & Woodford Dr. NE	725 gallons	Reported to EPA but not included in Attachment C
December 22, 2014	14400 Soula Dr NE	80 gallons	Reported to EPA but not included in Attachment C
January 1, 2015	Juan Tabo Blvd. & Southern Ave. SE	7050 gallons	Reported to EPA but not included in Attachment C
January 7, 2015	7550 Pan American Freeway NE	26,954 gallons	Reported to EPA but not included in Attachment C
January 8, 2015	SWRP Digester #4	1000 gallons	Reported to EPA but not included in Attachment C
January 12, 2015	3904 68th St. NW	40	Reported to EPA but not included in Attachment C
January 16, 2015	5100 Indian School, NE	40 gallons	
January 17, 2015	10410 Santa Susanna Rd., NE	25 gallons	
January 18, 2015	SWRP Pump House #2	3000 gallons	Reported to EPA but not included in Attachment C
January 27, 2015	2350 Alamo Ave., SE	125 gallons	
January 27, 2015	1000 Central, NE	80 gallons	1115 Central Ave. NE
January 28, 2015	Bluefeather/Lyons Blvd., NW	6,462 gallons	
January 31, 2015	11801 Tivoli Ave. NE	100 gallons	Reported to EPA but not included in Attachment C
February 7, 2015	4411 Canyon Ct., NE	50 gallons	
February 12, 2015	14217 Turner CT., NE	210 gallons	
February 15, 2015	517 Dolores Dr., SW	50 gallons	
February 19, 2015	SWRP Dewatering Facility	150 gallons	Reported to EPA but not included in Attachment C
February 21, 2015	1931 La Veta Dr. NE	615 gallons	Reported to EPA but not included in Attachment C

Date	Location	Volume	Comments
February 21, 2015	11011 Baldwin Ave. NE	810 gallons	Reported to EPA but not included in Attachment C
February 22, 2015	6400 Mossman Pl. NE	810 gallons	Reported to EPA but not included in Attachment C
February 24, 2015	733 Omaha St. NE	100 gallons	Reported to EPA but not included in Attachment C
February 24, 2015	Morris and Chica NE	10 gallons	Reported to EPA but not included in Attachment C
February 27, 2015	4201 Second Street SW	6,000,000 gallons	

Appendix 10 Corrective Action Response & Approval for Balduini Park

NEW MEXICO
ENVIRONMENT DEPARTMENT

Harold Runnels Building
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, New Mexico 87502-5469
Phone (505) 827-2900 Fax (505) 827-2965
www.env.nm.gov

SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

RYAN FLYNN
Cabinet Secretary

BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

August 21, 2015

Dr. James H. Olsen, P.E.
Albuquerque Bernalillo County Water Utility Authority
Field Division Collection System Section
4201 Second Street SW
Albuquerque, NM 87105

RE: Corrective Action Plan Approval, Albuquerque Bernalillo County Water Utility Authority, DP-1308

Dear Dr. Olsen:

On June 08, 2015, the Ground Water Quality Bureau of the New Mexico Environment Department (NMED) received written notification and corrective action responses of an unauthorized discharge at the Balduini Park located on the south side of Menaul Blvd. NE, immediately east of the North Diversion Channel (NDC) and west of Bryn Mawr Drive. The information submitted satisfies the reporting requirements of Subsection A of 20.6.2.1203 NMAC of the Water Quality Control Commission Regulations (20.6.2 NMAC).

Spill Description

According to the information submitted, the unauthorized discharge is described as follows:

The spill started approximately at 3:00 p.m. on Saturday May 23, 2015. The sanitary sewer overflow investigation found a blockage between manholes H16-531 and H16-541 approximately 750 feet west of the NDC. TLC is the current On-call contractor that managed the emergency. Around 11:30 PM a six-inch pump was installed and in operation at the upstream manhole (H16-541) to bypass and to discharge into manhole H16-531. The spill was decreased and continued up until 2:30 a.m. Sunday, May 24, 2015 when a second six-inch pump was in place and stopped it. An 18-inch pump was installed and operational at 9:00 a.m. and controlled higher daytime flows.

Approximately 2 million gallons of sewage spilled in less than 3 days was contained by the storm drainage pond at the Balduini Park. The cause of blockage was due to the collapse of a corroded 33" trunk sewer immediately downstream of manhole H16-541. No sewage was spilled downstream to the storm drainage system.

Corrective Actions

The corrective actions taken by the facility included:

- followed Water Authority's Overflow Emergency Response Plan;
- collected spill with vactor trucks;
- pond was fully pumped out;
- partial disinfection was provided by the application of high test hypochlorite; and
- a temporary fence was placed over the spilling manhole for cleanup.

The corrective actions taken by the permittee are hereby approved pursuant to Subsection A(7) of 20.6.2.1203 NMAC.

Additional corrective actions may be required if additional information becomes available indicating that the corrective actions taken are inadequate and/or ground water contamination occurs as a result of the described discharge. The Albuquerque Bernalillo County Water Utility Authority may be required to abate water pollution pursuant to Sections 20.6.2.4000 through 20.6.2.4115 NMAC, if the corrective action plan will not result in compliance with the standards and requirements set forth in Section 20.6.2.4103 NMAC within 180 days of confirmation of ground water contamination.

If you have any questions regarding these issues, please contact Alan Garrido at (505) 827-2713 or Steve Huddleson, Program Manager of the Pollution Prevention Section, at (505) 827-2936.

Sincerely,

Michelle Hunter, Chief
Ground Water Quality Bureau

MH:AG

cc: Steve Huddleson, Program Manager (electronic copy)
William Chavez, District Manager, NMED District I (electronic copy)
NMED Albuquerque Field Office (electronic copy)

Albuquerque Bernalillo County Water Utility Authority

Field Division
Collection System Section
4201 Second Street SW
Albuquerque, New Mexico 87105

June 5, 2015

Michelle Hunter, Acting Chief
Ground Water Quality Bureau
New Mexico Environment Department
1190 St. Francis Drive, P.O. Box 5469
Santa Fe, NM 87502-6110

Re: Albuquerque Bernalillo County Water Utility Authority Sanitary Sewer Line Notice of Discharge Removal and Corrective Action Response for Balduini Park

Dear Ms. Hunter:

In response to New Mexico Water Quality Control Commission Regulations (20.6.2.1203 NMAC), the Albuquerque Bernalillo County Water Utility Authority (Water Authority) is submitting the following Notice of Discharge Removal and Corrective Action Response Report for your notification and approval.

Sequence of Events

At 4:23 p.m. Saturday, May 23, 2015, Dispatch received a report of a sanitary sewer overflow (SSO) at Balduini Park which is located on the south side of Menaul Blvd. NE, immediately east of the North Diversion Channel (NDC) and west of Bryn Mawr Dr. The Standby Supervisor was alerted and the Standby Vactor crew was mobilized, arriving on-site at 5:05 and 5:57 p.m. respectively. The SSO was investigated and a blockage was found between manholes H16-531 and H16-541. This link is approximately 750 feet west of the NDC. At that time there was no evidence at the surface of a collapse and it was possible the cause of the overflow was a blockage. Water Authority crews made immediate efforts to unblock the line and additional crews were mobilized to assist.

The table below summarizes the Collapse and Spill Timeline. The need for by-pass pumping was quickly recognized. TLC was mobilized at 7:23 p.m. under an existing On-Call contract for such emergencies. The selected by-pass configuration was the only option that could be installed immediately. This involved two six-inch pumps that would be placed in the upstream manhole (H16-541) with separate six-inch lay-flat hoses to discharge to manhole H16-531. The first six-inch pump was in operation at approximately 11:30 p.m., which decreased but did not eliminate the spilling into Balduini Park. The second six-inch pump was in place at approximately 2:30 a.m. and the spill ceased.

While the six-inch pumps with lay-flat hose allowed the spill to be stopped, it was recognized that higher daytime flows might overwhelm these pumps. Therefore, TLC was already authorized to utilize, and was taking steps to mobilize, the much larger capacity 18-inch pump. At approximately 8:50 a.m. the next morning, May 24, the flow rate exceeded the six-inch pumping capacity and spilling resumed into the pond.

The critical path item for operation of the 18-inch pump is the fusion of HDPE force main. TLC utilized its fusion machine and also borrowed another machine from another contractor. The 18-inch pump was in operation at approximately 9 p.m. on Sunday at which time the spill stopped; except for a 40 minute spill early Tuesday morning due to a hung check valve on the pump, no more sewage was spilled. Spilling occurred from manhole H16-564 which, although it is on a 15" line and not on the collapsed trunk line, has the lowest rim elevation on the hydraulic system upstream of the collapse. This manhole is within the fenced area for the storm pond. AMAFCA is responsible for the pond area and owns a portion of the underlying land and has a drainage easement from the City for the remainder.

Shortly after the spill was recognized, the Water Authority contacted Jerry Lovato, AMAFCA Executive Engineer, and Kevin Daggett, with the City of Albuquerque. The Water Authority worked closely with Mr. Lovato and his staff. The Balduini Park pond drains to the North Diversion Channel (NDC) through a ported outlet structure. The outlet pipe has a flap gate to prevent backflow from the NDC. The outlet pipe can also be controlled by a normally open gate valve. The ported outlet structure, flap gate, and gate valve are owned, operated and maintained by AMAFCA. AMAFCA and Water Authority personnel verified the flap gate was kept closed by existing debris and no sewage had escaped. Later in the evening on May 23 AMAFCA personnel further blocked the flap gate with sand bags. On Monday in advance of an impending storm, AMAFCA with Water Authority concurrence closed the gate valve. An undetermined amount of storm runoff is understood to have reached Balduini Park and was contained and eventually also pumped to the sanitary sewer.

The sewage ponded to a depth of approximately 3.5' measured at the outlet structure. Based on this depth, the total volume contained is estimated at 2 million gallons. The lowest point in the pond is estimated at 0.5 to 1.0' below the lowest port in the outlet structure. Partial disinfection was provided by the application of nearly 300 pounds of high test hypochlorite (HTH), i.e. calcium hypochlorite, in the spilling sewage on Saturday and Sunday.

It was not possible to pump out Balduini Park until an adequate by-pass system, i.e. the 18-inch pump and force main, was in operation. Approximately 2 hours (11 p.m.) after the 18-inch pump was in operation the first pump was draining the pond. Additional pumps were added the next day until two six-inch and two smaller pumps were continuously pumping. One six-inch pump broke on Monday and was replaced on Tuesday. On May 26, the pond was fully pumped out at the outlet structure although some puddles remained in the middle of the pond. The pond is now dry. A temporary fence was placed over the spilling manhole to catch rags and provide for easier cleanup. Water Authority crews removed rags from pond after drying adequately to provide for access.

The cause of the blockage was confirmed early Sunday morning when the collapse reached the surface. The existing 33" RCP had collapsed due to corrosion immediately downstream of manhole H16-541. The 25' depth at this location caused the delay in surface subsidence.

Verbal notification was made within 24 hours to NMED Surface Water Quality Bureau (SWQB). In accordance with prior communication with the NMED Groundwater Quality Bureau (GWQB), this also

suffices for notification to the GWQB. The five-day written notification of the spill and discharge removal was made by letter to the US EPA with copies to the NMED SWQB and GWQB.

Collapse and spill timeline

Day	Date	Time	Event / Comment	Time
Saturday	5/23/15	3:00 PM	Approximate start of spill	8 hr 30 min
Saturday	5/23/15	11:30 PM	First 6" pump in operation. Spill continues but not as much.	3 hr 0 min
Sunday	5/24/15	2:30 AM	2nd 6" pump in place. Spill stops.	0 hr 0 min
Sunday	5/24/15	8:50 AM	Flow greater than capacity of both 6" pumps which continue pumping. Spill resumes.	12 hr 10 min
Sunday	5/24/15	9:00 PM	Both 6" pumps taken off-line and 18" pump started up. Spill stops.	0 hr 0 min
Monday	5/25/15	All Day	No spills.	0 hr 0 min
Tuesday	5/26/15	5:00 AM	Check valve on 18" pump hangs up and pump loses prime. Spill resumes for ~40 minutes.	0 hr 40 min
				24 hr 20 min

Conclusion and Corrective Action Responses

Approximately 2 million gallons of sewage spilled to and was contained by the storm drainage pond at Balduini Park. There was sewage collected in the pond for more than two days and less than three days, other than minor puddles that later dried. The spill was caused by the collapse of a 33" trunk sewer. By-pass pumping around the collapse is on-going and repairs are in the process of being made. No sewage was spilled to the downstream storm drainage system, i.e. the North Diversion Channel. All sewage was pumped back into the sanitary sewer system less the amount that soaked into the earth lined pond and likely evapotranspired. Nearly 300 pounds of HTH was applied to assist with disinfection.

The Water Authority followed its Overflow Emergency Response Plan (OERP) for sanitary sewer overflows in the collection system. The OERP is attached for reference. Page 3 addresses specific issues related to spills to pervious areas in which, remediation consists of removing the wastewater, controlling access, and allowing to dry which completes remediation. This is in addition to steps noted elsewhere in the OERP, e.g. remove solids and apply HTH as noted on page 2.

Based on the analysis and remedial steps taken, it is concluded that this overflow event will have little effect to the public health or to the ground water or environment in the area.

Please contact me at 505-857-8235 (soon changing to 505-289-3535) with questions or comments.

Sincerely,

Dr. James H. Olsen, P.E.
Manager, Field Division

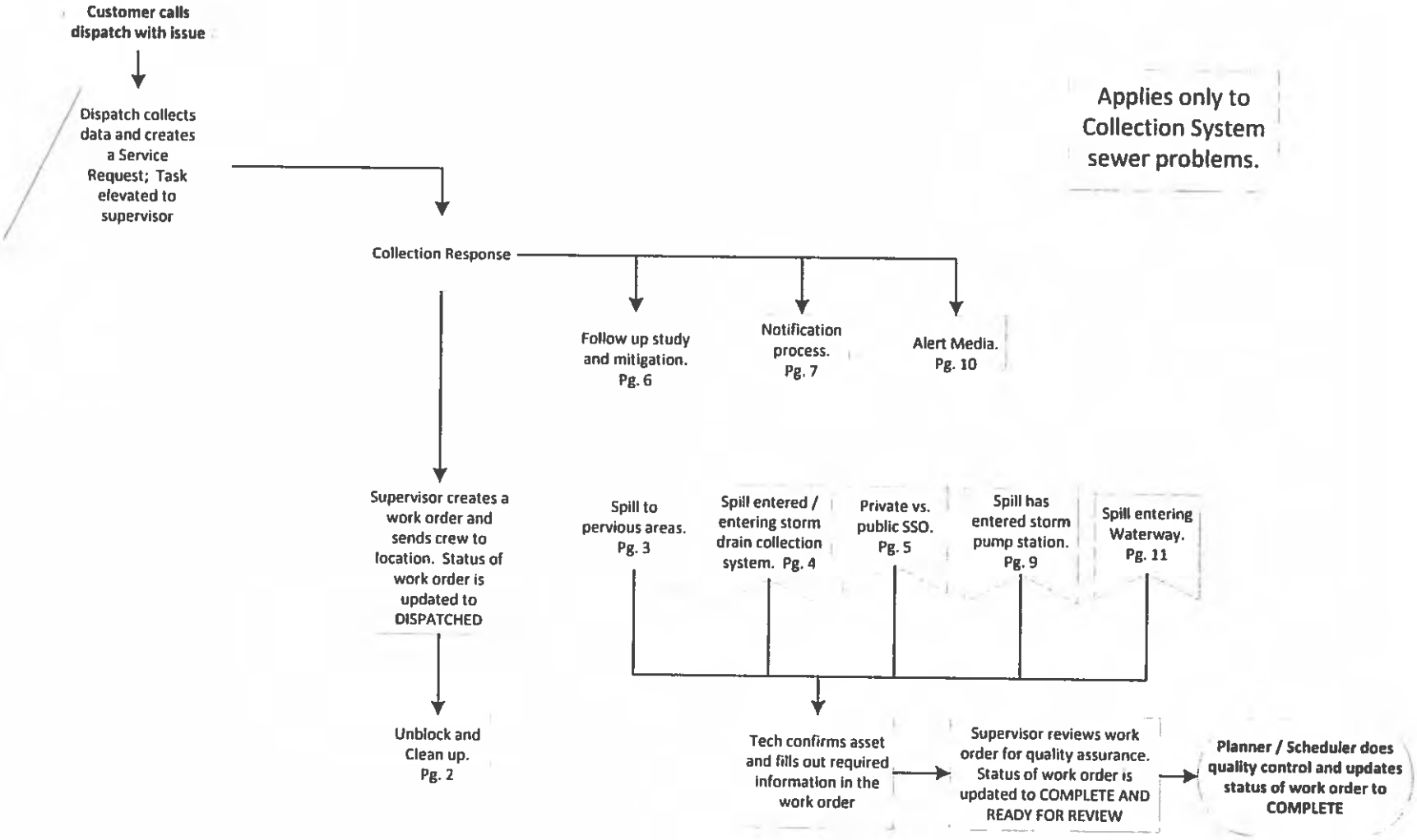
Attachment: OERP

cc: Sandra Gabaldon, NMED, Surface Water Quality Bureau
Mark Sanchez, Executive Director, ABCWUA
John M. Stomp III, P.E., Chief Operating Officer, ABCWUA
Mark Holstad, Collection System Manager, Field Division, ABCWUA
Mark Kelly, Compliance Manager, ABCWUA
Kevin Daggett, P.E., Manager, Storm Drainage Design Section, COA
Jerry Lovato, P.E., Executive Engineer, AMAFCA

Overflow Emergency Response Plan

01-26-2015

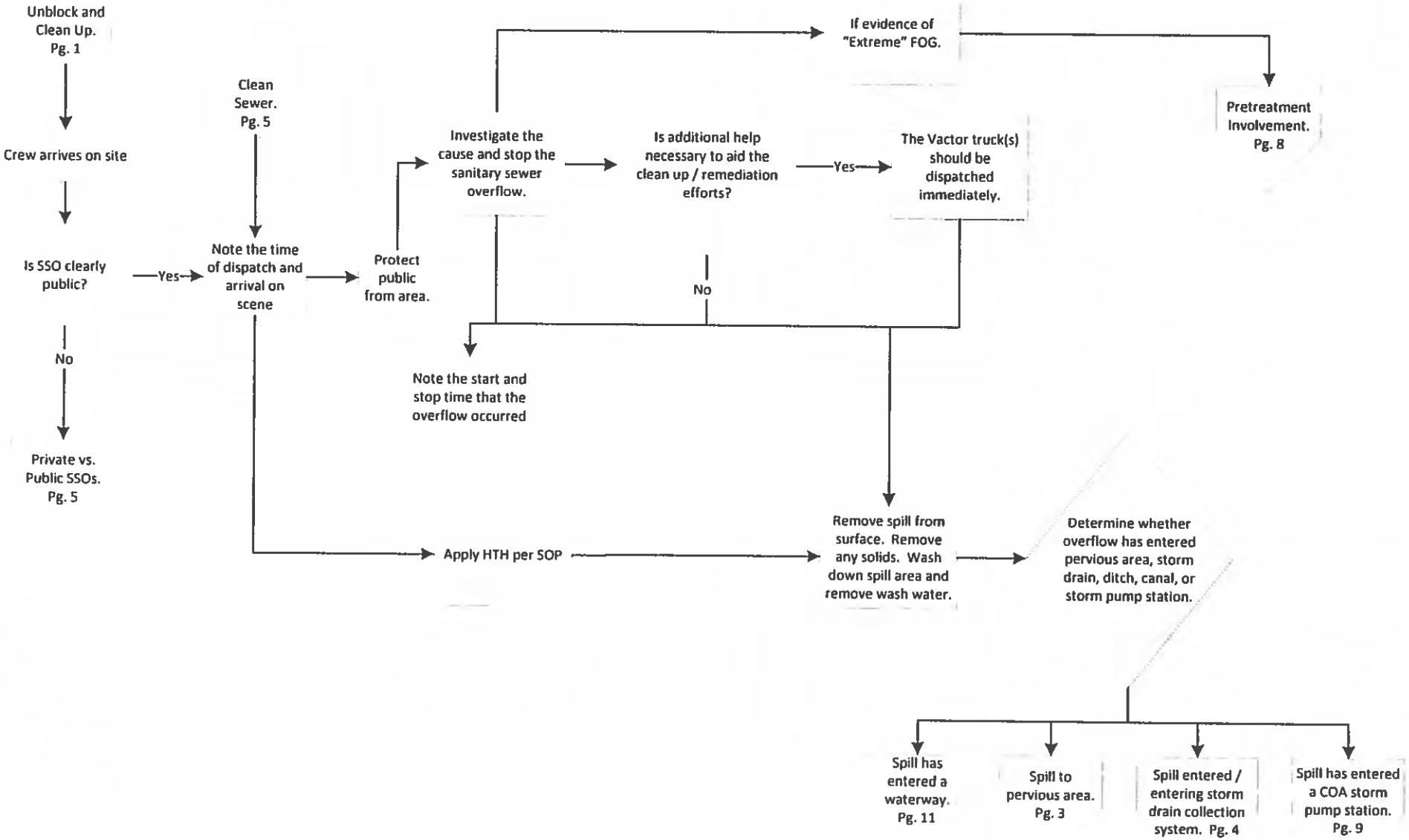
Albuquerque Bernalillo County Water Utility

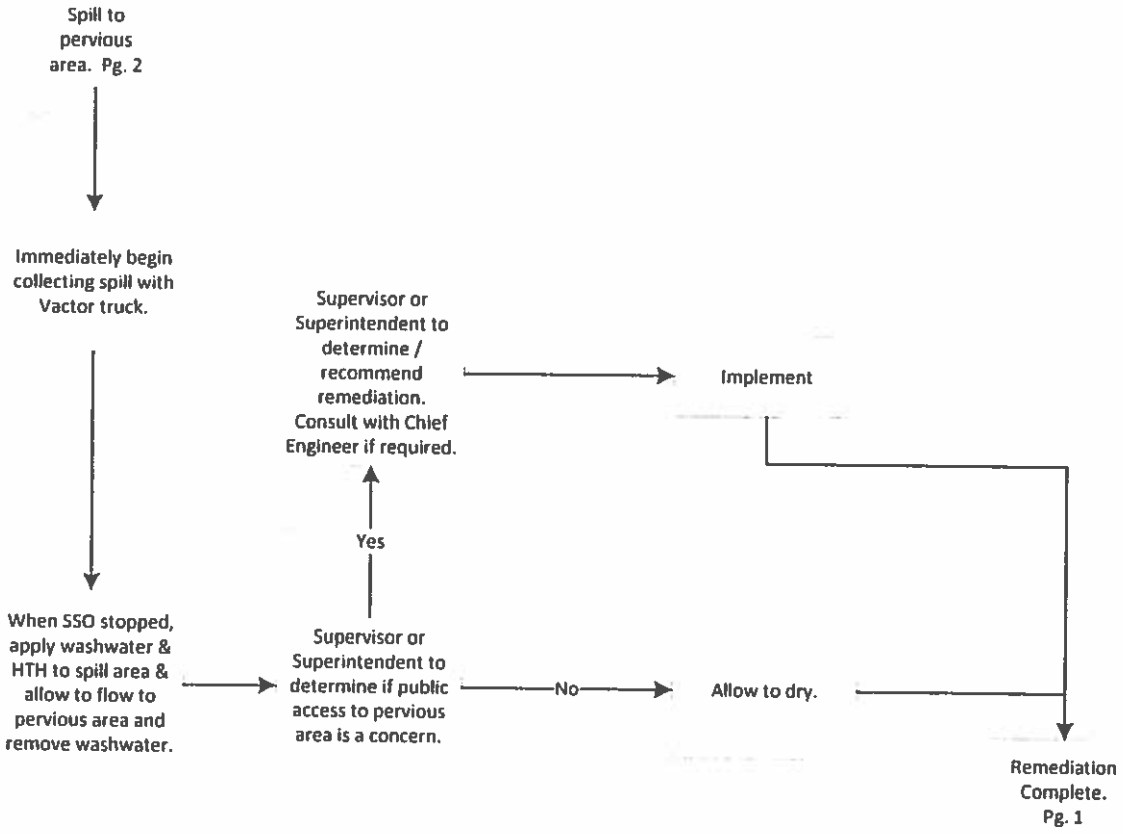


Overflow Emergency Response Plan

01-26-2015

Albuquerque Bernalillo County Water Utility

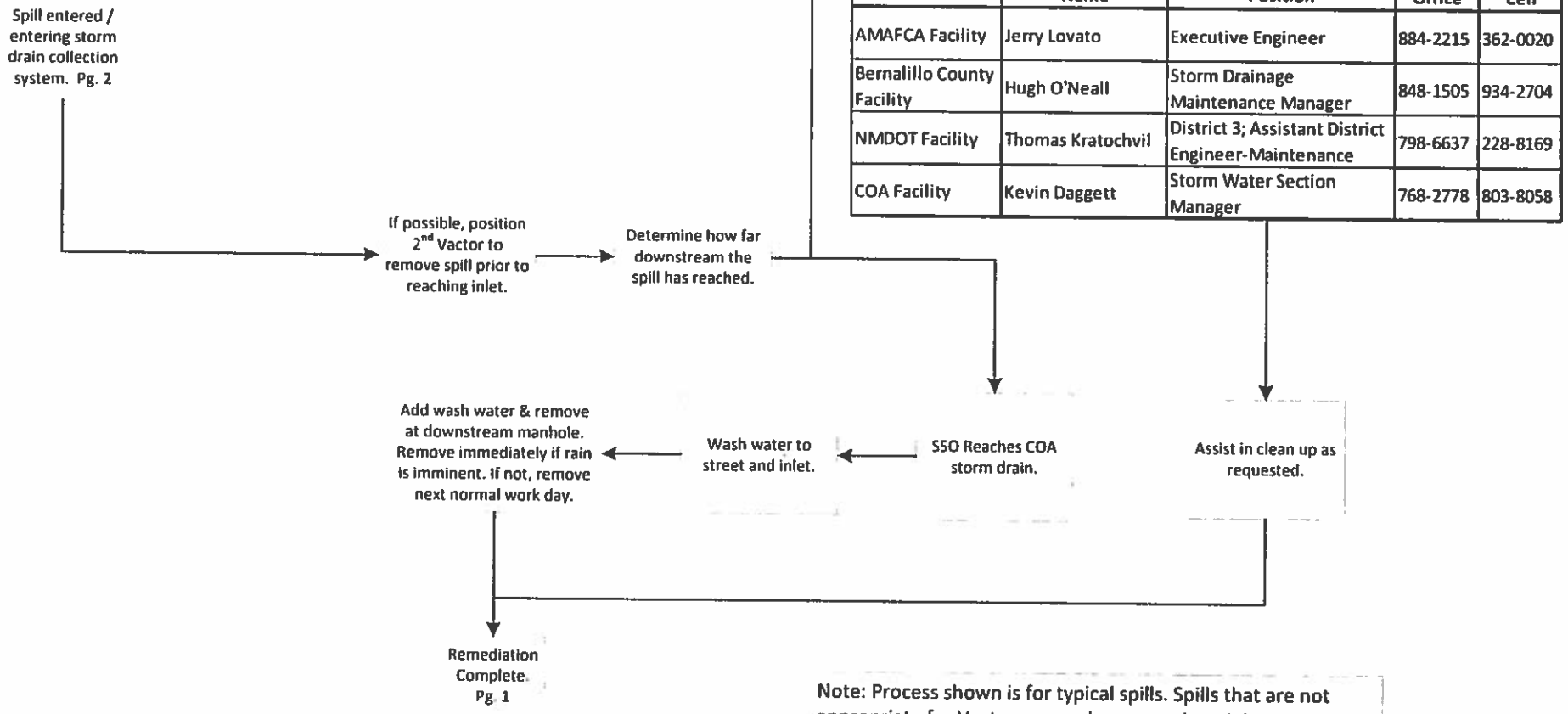



Spill to pervious area. Pg. 2
Immediately begin collecting spill with Vactor truck.
When SSO stopped, apply washwater & HTH to spill area & allow to flow to pervious area and remove washwater.
Supervisor or Superintendent to determine if public access to pervious area is a concern.
Yes
Supervisor or Superintendent to determine / recommend remediation. Consult with Chief Engineer if required.
No
Allow to dry.
Implement
Remediation Complete. Pg. 1

Overflow Emergency Response Plan

01-26-2015

Albuquerque Bernalillo County Water Utility



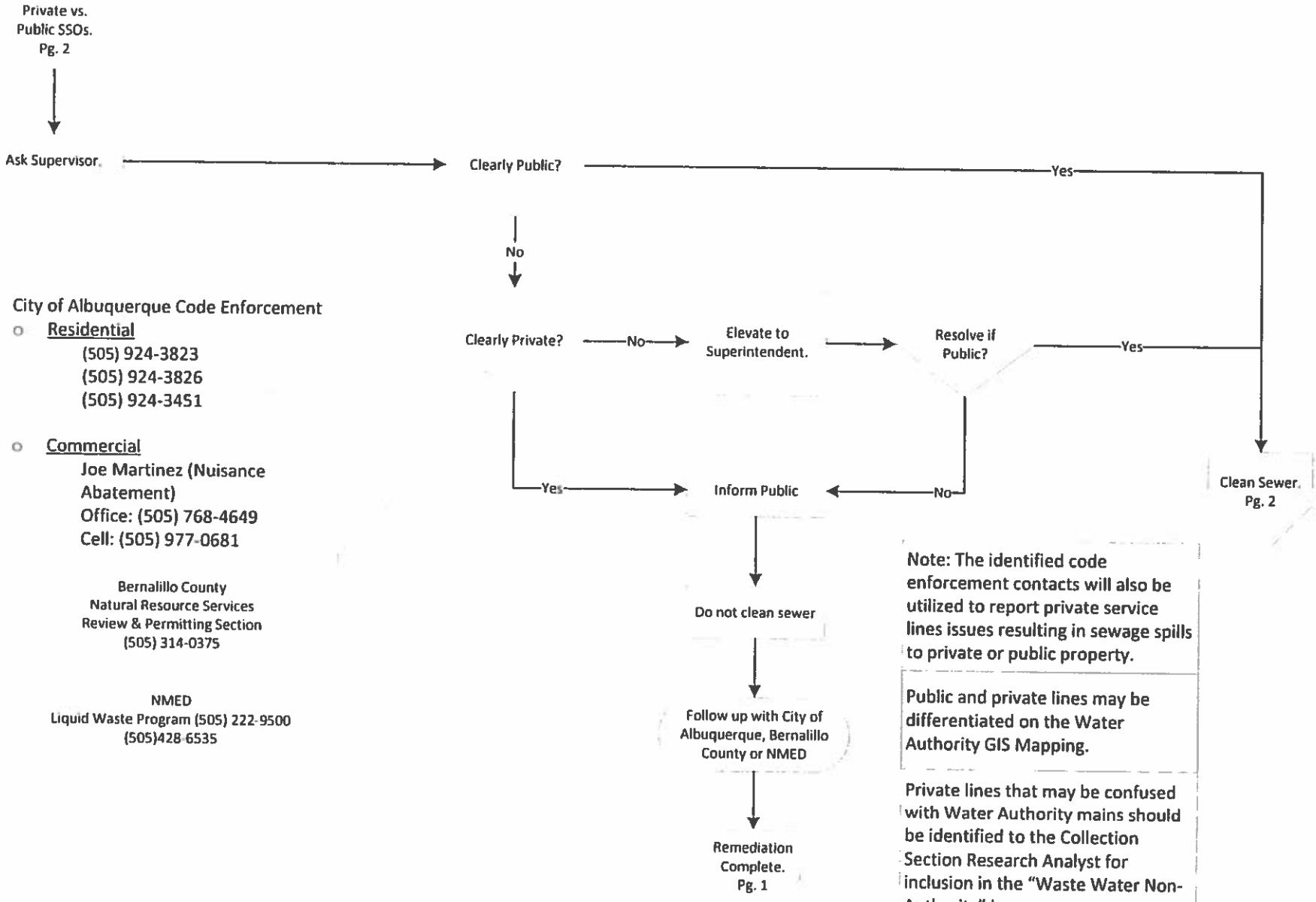
SSO Reaches	Contact			
	Name	Position	Office	Cell
AMAFCA Facility	Jerry Lovato	Executive Engineer	884-2215	362-0020
Bernalillo County Facility	Hugh O'Neall	Storm Drainage Maintenance Manager	848-1505	934-2704
NMDOT Facility	Thomas Kratochvil	District 3; Assistant District Engineer-Maintenance	798-6637	228-8169
COA Facility	Kevin Daggett	Storm Water Section Manager	768-2778	803-8058

Note: Process shown is for typical spills. Spills that are not appropriate for Vactor removal may require a joint response with the impacted MS4 Permittee in which the spill is captured, treated, and determined appropriate for release.

Overflow Emergency Response Plan

01-26-2015

Albuquerque Bernalillo County Water Utility



City of Albuquerque Code Enforcement

- Residential
  - (505) 924-3823
  - (505) 924-3826
  - (505) 924-3451
- Commercial
  - Joe Martinez (Nuisance Abatement)
  - Office: (505) 768-4649
  - Cell: (505) 977-0681

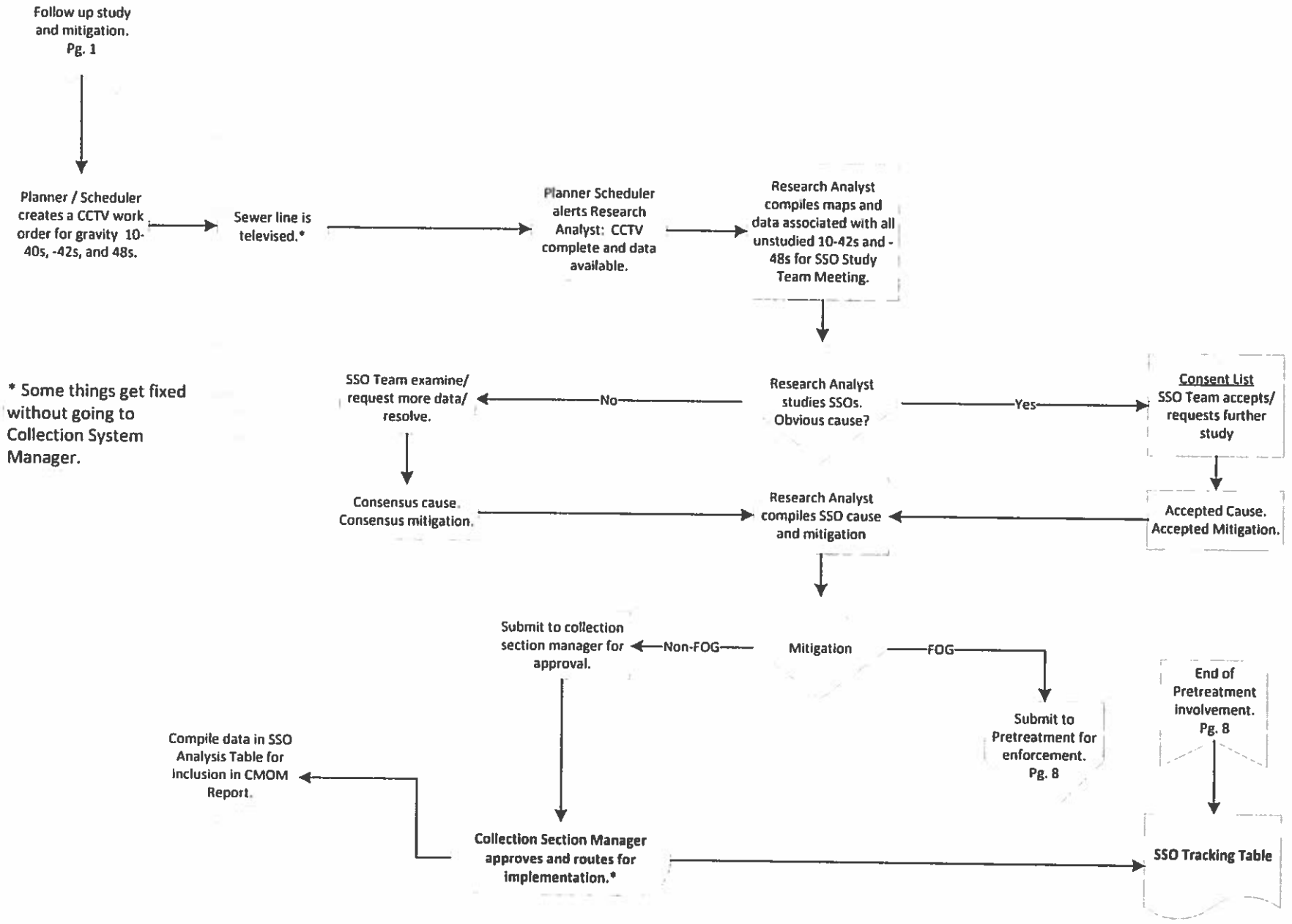
Bernalillo County
Natural Resource Services
Review & Permitting Section
(505) 314-0375

NMED
Liquid Waste Program (505) 222-9500
(505)428-6535

Note: The identified code enforcement contacts will also be utilized to report private service lines issues resulting in sewage spills to private or public property.

Public and private lines may be differentiated on the Water Authority GIS Mapping.

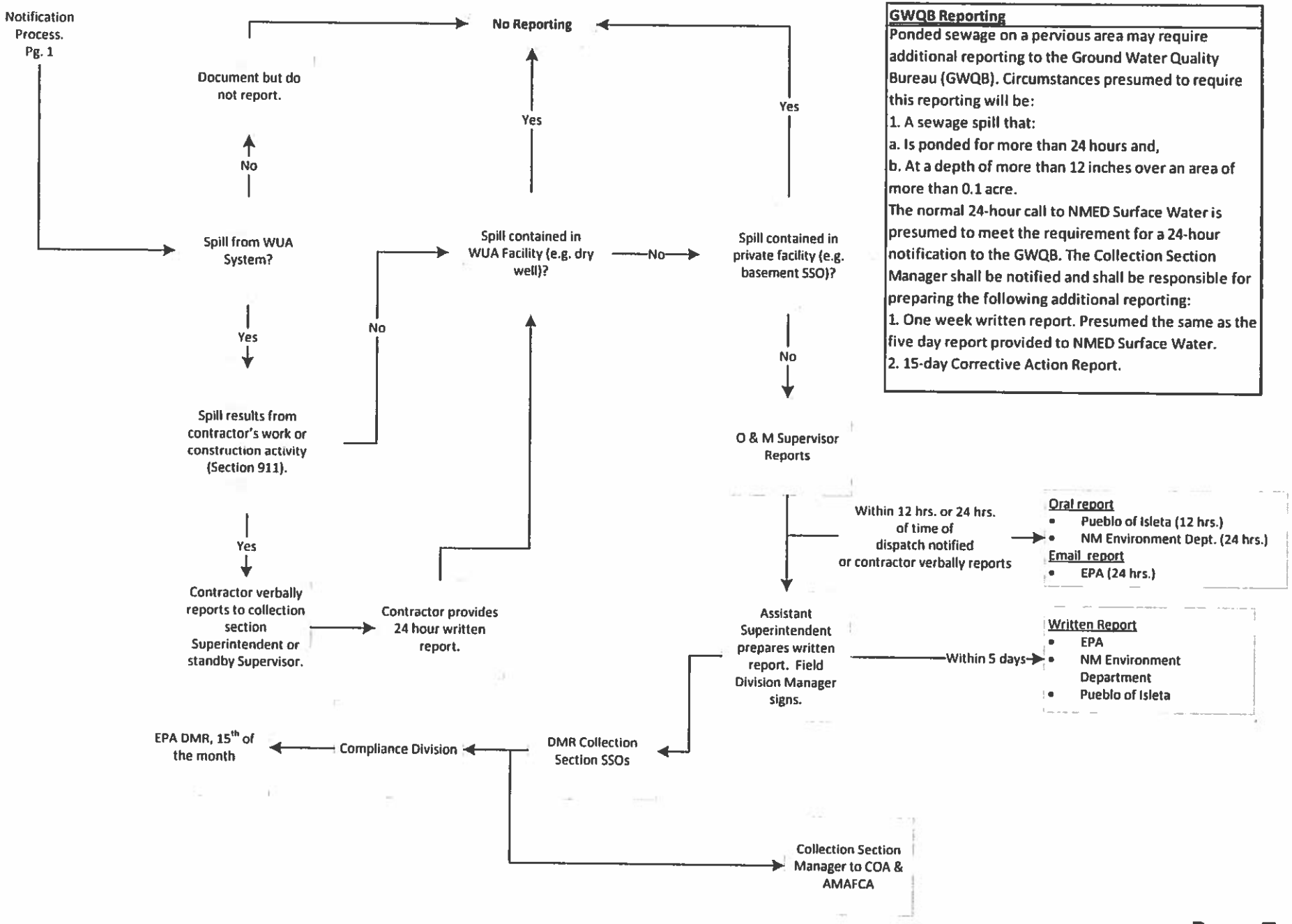
Private lines that may be confused with Water Authority mains should be identified to the Collection Section Research Analyst for inclusion in the "Waste Water Non-Authority" layer.


Follow up study and mitigation. Pg. 1
Planner / Scheduler creates a CCTV work order for gravity 10-40s, -42s, and 48s.
Sewer line is televised.*
Planner Scheduler alerts Research Analyst: CCTV complete and data available.
Research Analyst compiles maps and data associated with all unstudied 10-42s and -48s for SSO Study Team Meeting.
* Some things get fixed without going to Collection System Manager.
Research Analyst studies SSOs. Obvious cause?
No
SSO Team examine/ request more data/ resolve.
Yes
Consent List
SSO Team accepts/ requests further study
Consensus cause. Consensus mitigation.
Research Analyst compiles SSO cause and mitigation
Accepted Cause. Accepted Mitigation.
Mitigation
Non-FOG
Submit to collection section manager for approval.
FOG
Submit to Pretreatment for enforcement. Pg. 8
End of Pretreatment involvement. Pg. 8
Compile data in SSO Analysis Table for Inclusion in CMOM Report.
Collection Section Manager approves and routes for implementation.*
SSO Tracking Table

Overflow Emergency Response Plan

01-26-2015

Albuquerque Bernalillo County Water Utility



GWQB Reporting

Ponded sewage on a pervious area may require additional reporting to the Ground Water Quality Bureau (GWQB). Circumstances presumed to require this reporting will be:

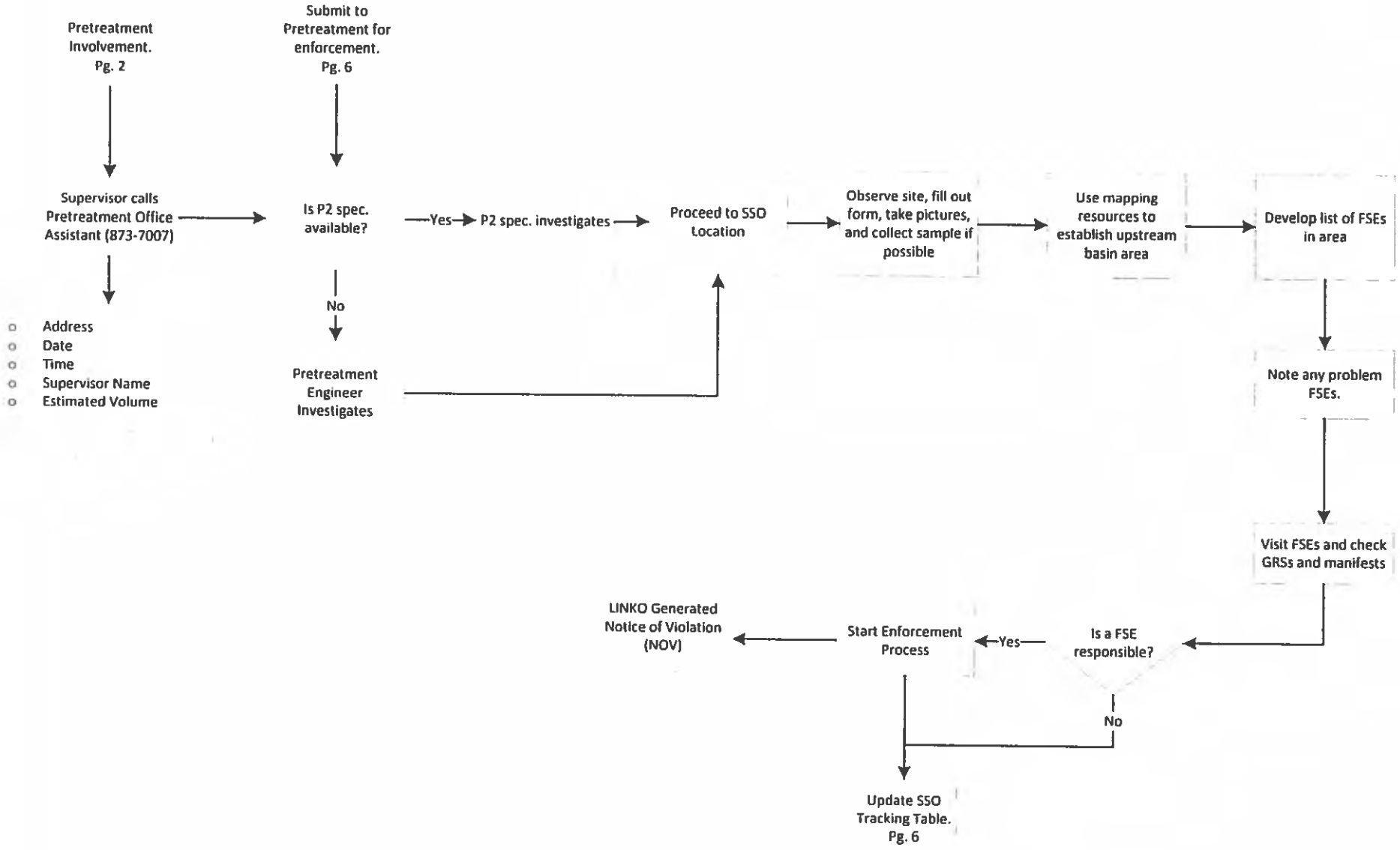
1. A sewage spill that:

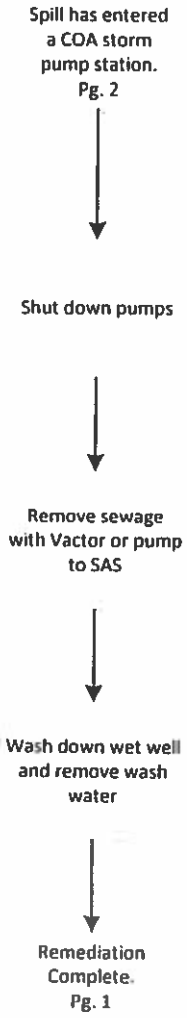
a. Is ponded for more than 24 hours and,

b. At a depth of more than 12 inches over an area of more than 0.1 acre.

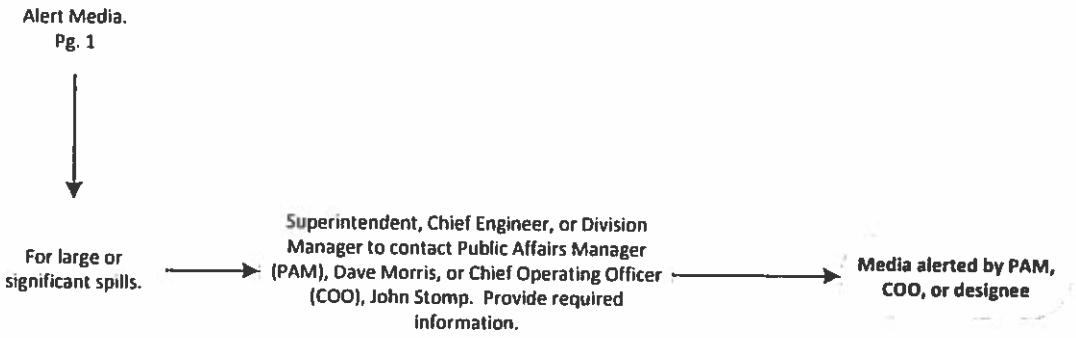
The normal 24-hour call to NMED Surface Water is presumed to meet the requirement for a 24-hour notification to the GWQB. The Collection Section Manager shall be notified and shall be responsible for preparing the following additional reporting:

1. One week written report. Presumed the same as the five day report provided to NMED Surface Water.
2. 15-day Corrective Action Report.


Pretreatment Involvement. Pg. 2
Submit to Pretreatment for enforcement. Pg. 6
Supervisor calls Pretreatment Office Assistant (873-7007)
Is P2 spec. available?
Yes
P2 spec. investigates
Proceed to SSO Location
Observe site, fill out form, take pictures, and collect sample if possible
Use mapping resources to establish upstream basin area
Develop list of FSEs in area
Note any problem FSEs.
Visit FSEs and check GRSs and manifests
Is a FSE responsible?
Yes
Start Enforcement Process
LINKO Generated Notice of Violation (NOV)
No
Update SSO Tracking Table. Pg. 6
No
Pretreatment Engineer Investigates
Address
Date
Time
Supervisor Name
Estimated Volume



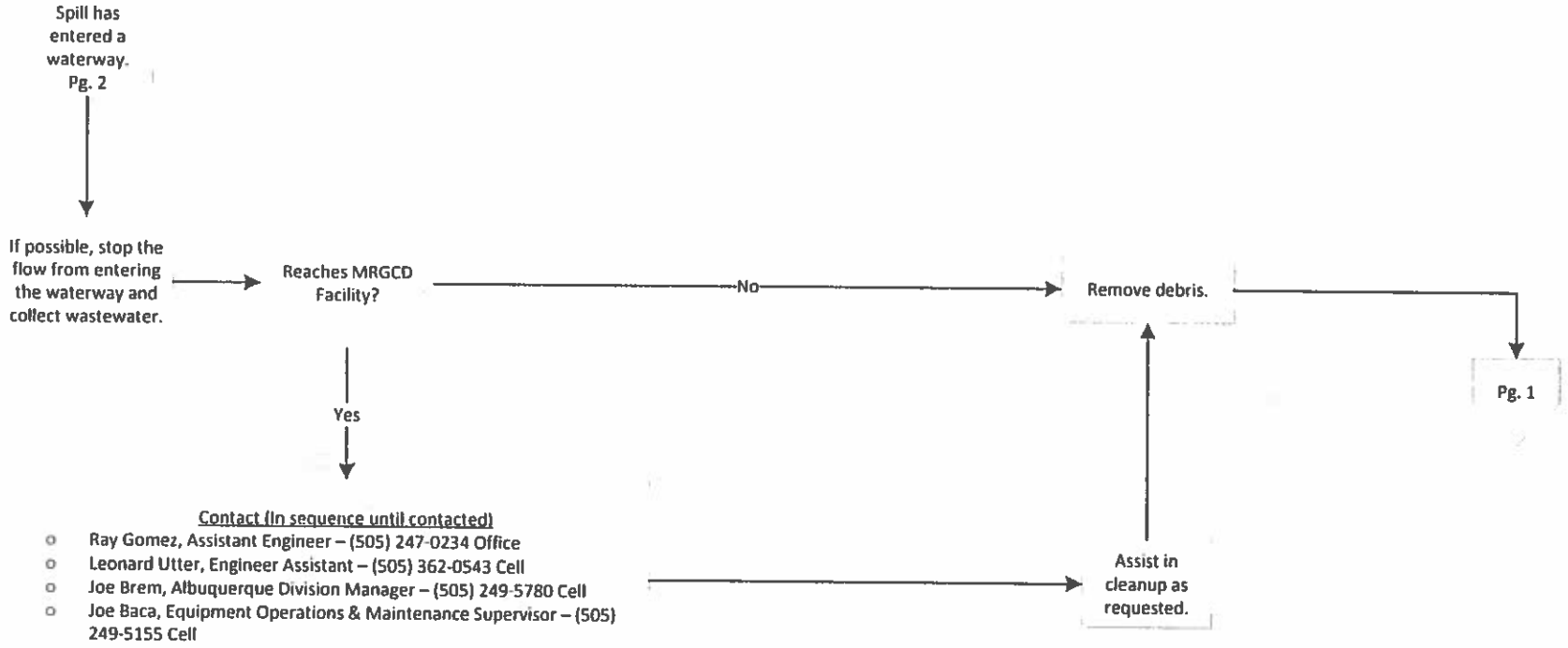
Note: Process shown is for typical spills. Some spills may require a joint response with the City of Albuquerque in which the spill is captured, treated, and determined appropriate for release.


Alert Media.
Pg. 1
For large or significant spills.
Superintendent, Chief Engineer, or Division Manager to contact Public Affairs Manager (PAM), Dave Morris, or Chief Operating Officer (COO), John Stomp. Provide required information.
Media alerted by PAM, COO, or designee

Overflow Emergency Response Plan

Albuquerque Bernalillo County Water Utility

01-26-2015



Appendix 11 Modification of Permit

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE
DALLAS, TEXAS 75202-2733

JAN 12 2014

CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7014 0150 0000 2453 0312)

REPLY TO: 6WQ-NP

Mr. John M. Stomp, III, P.E.
Chief Operating Officer
Albuquerque Bernalillo County Water Utility Authority
PO Box 568
Albuquerque, NM 87103

Re: Modification of Permit Conditions for Albuquerque Bernalillo County Water Utility Authority Southside Water Reclamation Plant NPDES Permit NM00022250

Dear Mr. Stomp, III:

On January 5, 2015 the USFWS in New Mexico requested EPA (via email) to waive the entire notification process to this office. Pursuant to 40 CFR 122.63(a), the following minor permit administrative changes are made to page 6 of Part I:

- Removal of oral & written notification and results from WET testing to the USFWS.

The revised page(s) of Part I of the final permit are enclosed. Please discard the outdated copies. Should you have any question on any aspect of the administrative change, please feel free to contact Tung Nguyen of the NPDES Permits Branch at the above address or Voice: (214) 665-7153, Fax: (214) 665-2191, or E-mail: nguyen.tung@epa.gov.

Sincerely yours,

Brent E. Larsen
Chief
Permit & Technical Assistance Section

Enclosures

cc w/enclosure:
New Mexico Environment Department
Pueblo of Isleta
U.S. Fish and Wildlife Service

prior approval granted by the permitting authority for this procedure to be acceptable. Data reported must also include evidence to show that the proper correlation continues to exist after approval.

6. The permittee shall report all overflows with the Discharge Monitoring Report submittal. These reports shall be summarized and reported in tabular format. The summaries shall include: the date, time, duration, location, estimated volume, and cause of the overflow; observed environmental impacts from the overflow; actions taken to address the overflow; and ultimate discharge location if not contained (e.g., storm sewer system, ditch, tributary). Any noncompliance which may endanger health or the environment shall also be orally reported to the Pueblo of Isleta at (505) 869-7565 as soon as possible, but within 12 hours from the time the permittee becomes aware of the circumstance. Notification shall be made to the EPA at the following e-mail address: <R6_NPDES_Reporting@epa.gov>, as soon as possible, but within 24-hours from the time the permittee becomes aware of the circumstance. Lastly, oral notification shall also be to the New Mexico Environment Department at (505) 827-0187 as soon as possible, but within 24 hours from the time the permittee becomes aware of the circumstance. A written report of overflows which endanger health or the environment shall be provided to EPA, the New Mexico Environment Department and the Pueblo of Isleta, within 5 days of the time the permittee becomes aware of the circumstance.

7. Any and all reports, correspondence and material(s), required to be submitted to the EPA, including but not limited to those identified in No's 1 through 6 above of this part, shall also be reported to the NMED and the Pueblo of Isleta at the addresses noted in No. 2 above.

D. POLLUTION PREVENTION REQUIREMENTS

The permittee shall institute a program within 12 months of the effective date of the permit (or continue an existing one) directed towards optimizing the efficiency and extending the useful life of the facility. The permittee shall consider the following items in the program:

a. The influent loadings, flow and design capacity;
b. The effluent quality and plant performance;
c. The age and expected life of the wastewater treatment facility's equipment;
d. Bypasses and overflows of the tributary sewerage system and treatment works;
e. New developments at the facility;
f. Operator certification and training plans and status;
g. The financial status of the facility;
h. Preventative maintenance programs and equipment conditions and;
i. An overall evaluation of conditions at the facility.