

Herman, Jason, NMENV

From: Herman, Jason, NMENV
Sent: Thursday, September 13, 2018 2:18 PM
To: 'WILLIAM L MANSKER PhD'
Cc: loretta_rael@yahoo.com; Hunter, Michelle, NMENV
Subject: Response to questions and email
Attachments: DP-465 SDDS - septage.xls; DP-465 SDDS - sludge.xls

Mr. Mansker,

Thank you for your email. I will address as many of your questions/concerns as I can with my responses below (blue text).

I am attaching jpeg scans of the letter I received last week from Michelle Hunter(NMED-GWQB). A Certified original was evidently send to your old P.O. Box address and that may be why your never received it. I am cc'ing this email to Ms. Hunter (and to Pete Domenici, Jr.) so that she is aware that your mailing address for S&R Septiic is changed (to: P.O.Box 3155; Rancho de Taos; 87557) and she can correct your contact information .in the NMED-GWQB S&R Septic files.

My apologies for the confusion. The most recent renewal application included references to an incorrect address. I will make note across the whole file to only mail to the above referenced address.

We should contact Ms. Hunter and schedule a meeting to discuss the non-compliance issues and timely respond to the letter.

If you would like to set up a meeting next week I can reserve a meeting room in Santa Fe. I will be in the office on Monday and Friday of next week and out for inspections the rest of the days.

There are some clarifications that NMED needs to recognize, such as their (and our) understanding of what exactly is considered "sludge" and what sampling protocols and anaytes are applicable to the semi-annual sampling requirements.

The 2012 permit defines the authorized discharges as "domestic septage (including portable toilet waste)" for "liquid, semi-solid and solid domestic wastewater treatment facility and/or package treatment plant sludge." We generally will refer to 40 CFR 503.9(f) for a definition of domestic septage and 40 CFR 503.9(w) for sewage sludge.

The NONC is referencing to the requirement for testing of wastewater treatment sludge disposed of at the facility. Test results are then supposed to be used for nitrogen loading calculations on a Surface Disposal Data Sheet (SDDS). An alternative method is provided for septage only and includes calculation of the nitrogen loading for each cell by use of an assumed 600 mg/L total nitrogen content in the septage. The total amount of nitrogen applied to each of the 16 cells each month should then be reported through submission of a surface disposal data sheet. This is required by Condition 18 for Domestic Septage and Conditions 19, 20 and 21 for Sludge. At this time we have received

It was my understanding from the 2012 DP Renewal yhat lagoon bottom representative composite soil samples were no longer being required.

You are correct that the 2012 renewal did not include monitoring requirements for soil sampling.

So, we therefore perhaps need some written MOI regarding sample data that need to be submitted. It is my opinion that the term "sludge" applies to industrial and wastewater sources and NOT to household septage solids that S&R routinely transports and disposes at the S&R Facility. We need regulatory clarification on this issue..

The monitoring summaries provided the S & R Septic include indication that pumping and disposal of waste non-domestic septage has been occurring consistently at the facility. Domestic Septage as defined by CFR does not include any industrial or commercial waste streams. The most recent monitoring summary reported 31,200 gallons of sludge disposed of at the facility and requires the additional sludge characterization for calculation of the loading to each cell. The previous monitoring summaries do not appear to show any sludge being disposed of at the facility and those reports should have included a statement that no surface disposal occurred within the specific cells.

The signage and 'splash pads' issues are obvious and easily remedied and we should so reassure NMED-GWQB ASAP.

Also, regarding NMED's declarations that some monitoring and load manifest reporting is deficient, Loretta has previously reported to me that the current NMED-GWQB project manager stated to her in a meeting that missing reports (in arrears) were no longer needed and that currency need to be maintained (We need to confirm this!).

You are correct that the previous monitoring reports are not required if the sampling was not performed, SDDS sheets not completed or manifests/summaries are not available. As I stated to Ms. Rael, if this is case then NMED requires a statement/description of the reason for the deficiencies (the reason monitoring and SDDS were not completed) and how this will be corrected in the future. This can be accomplished through a simple letter to me. The most recent monitoring report submission included two remaining deficiencies that will need to be addressed. Cell identification is required to be reported with the totals disposal gallons for each cell and total disposal per cell calculated. All disposal needs to be documented in such a way that the nitrogen loading calculations can be completed and submitted as required by the permit condition. Sampling or the standard must be used to determine the total nitrogen per acre has been applied to each cell. And finally a SDDSs for each cell must filled out and submitted. I have attached a template for your convenience.

Thank you for your attention to this matter and please let me know if you have any additional questions or would like to schedule a meeting.

Jason G. Herman

New Mexico Environment Department
Ground Water Quality Bureau
Pollution Prevention Section
Harold Runnels Building
1190 Saint Francis Drive
P.O. Box 5469
Santa Fe, NM 87502-5469
(Ph) 505-827-2713

From: WILLIAM L MANSKER PhD <wlminex@msn.com>
Sent: Monday, September 10, 2018 4:26 PM
To: Hunter, Michelle, NMENV <Michelle.Hunter@state.nm.us>
Cc: Herman, Jason, NMENV <Jason.Herman@state.nm.us>; loretta_rael@yahoo.com
Subject: Re:

Thank, Michelle I've added Jason to tmy email cluster for S&R.

Regards,
Bill

----- Original Message -----

From: Hunter, Michelle, NMENV