

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	09/13/2022	
Media Program:	Water	
Regulatory Program(s)	NPDES	
Company Name:	Laguna Development Corporation	
Facility Name:	Casa Blanca Wastewater Treatment Plant (WWTP)	
Facility Physical Location:	Southeast of the intersection of Interstate 40 (I-40) and Casa Blanca Road (aka Indian Service Route #23)	
(city, state, zip code)	Pueblo of Laguna, Cibola County, New Mexico	
Mailing address:	14500 Central Avenue SW	
(city, state, zip code)	Albuquerque, New Mexico 87121	
County/Parish:	Bernalillo	
Facility Phone Number	505-463-0873	
Facility Contact:	Glenn Trotter	Level 2 Operator
	gtrotter@POLDC.com (505-463-0873)	
FRS Number:	110020039340	
Identification/Permit Number:	NM0030678	
Media Identifier Number:	NA	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Glenn Trotter	Casa Blanca/Rio Puerco WWTP	Operator
David A. Esparza	USEPA/6ECDWM	Environmental Engineer
EPA Lead Inspector Signature/Date		
	David A. Esparza	Date
Supervisor Signature/Date		
	Robert Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector David Esparza, PE, arrived at the Casa Blanca Wastewater Treatment Plant (WWTP) (hereinafter referred to as Casa Blanca WWTP) operated via contract by the Laguna Development Corporation (LDC) at approximately 9:30 AM on September 13, 2022, for an unannounced inspection. I met with Mr. Trotter and presented my credentials and informed him that this was an EPA inspection to determine Casa Blanca's WWTP compliance under the Clean Water Act (CWA). This compliance evaluation inspection (CEI) was conducted under the authority of the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the CWA. The generation of this report is based on information supplied by Laguna Development representatives, observations made by the United States Environmental Protection Agency (US EPA) inspector, and records and reports maintained by the permittee, and the US EPA.

FACILITY DESCRIPTION

The WWTP is a minor discharger with a design flow capacity of 0.19 MGD (million gallons per day). Pre-Pandemic the average daily discharge flow was 55k-gallons per day (gpd). It is currently averaging between 35k to 45k gpd. The facility is located approximately 0.30-miles southeast of the intersection of U.S. Interstate 40 (I-40) and Indian Service Route #23, Cibola County, New Mexico (depicted in **Aerial Image #1** below). The WWTP facility serves the Dancing Eagle Casino/administrative buildings, restaurant, high school, senior center, residential area, and travel center.



Aerial Image #1: Overall view of the Laguna Development Corporation- Casa Blanca Wastewater Treatment Plant location. Note: the evaporative lagoon cells. Aerial from Google Earth Maps.

The WWTP is overseen by Level 2 Operator Mr. Glenn Trotter on a 24-hour/365-day schedule.

The treatment works are a Kubota™ Membrane Bioreactor (MBR) employing two (2) basins with 4 plate cartridges in each basin. The 2 basins operate simultaneously except during brief times when maintenance is being performed on one (1) unit. The combined twin MBR design flow is 0.19 MGD with peak flow capability of 0.38 MGD.

A Supervisory Control and Data Acquisition (SCADA) system provides around the clock monitoring of WWTP operations. The influent is piped using three (3) lift stations (LS) (**Table 1** below) through an automated fine screen, thence into a single anoxic tank under constant mixing. Wastewater then enters an aerated tank via gravity flow, thence continues to the MBR basins. The mixed liquor suspended solids from the MBR basins is returned to the anoxic tank, thence the treated permeate is gravity flowed through the storage tank to the outfall structure, with chlorine injection on the outlet side.

Table 1 Casa Blanca Lift Stations

Name	Location	Comment
WWTP #1	Northwest corner inside WWTP fenced perimeter	Vault (concrete) was replaced, and LS was serviced circa early 2020. Locked hatchway w/ safety gate.
WWTP #2	North outside of WWTP fenced perimeter	Vault (concrete) was replaced, and LS was serviced circa early 2020. Locked hatchway w/ safety gate. Lacks secure perimeter fencing, alarms (either audible or flashing light) or signage.
Burger King	West side of drive-thru next to building	Vaults were cleaned, serviced and new pumps were installed circa early 2020.

Waste sludge is drawn from the recycle line and placed into a series of five (5) lined aerated lagoons for extended treatment. All pumps, blowers and the entire facility have a backup generator arranged to automatically run as required.

The disinfected effluent is discharged through Outfall 001 to Acoma Creek (Latitude 35° 01' 37" North and Longitude 107° 28' 11" West), thence to the Rio San Jose. The Rio San Jose is a perennial stream. It becomes intermittent when flow is diverted during the growing season for irrigation water within the village jurisdictions. The flow in the lower reaches of the Rio San Jose below the Highland Meadows area flows year-round to its convergence with the Rio Puerco between the Pueblos of Laguna and Isleta.

Section II - OBSERVATIONS

I observed the following and/or the following information was provided and/or stated:

- The operator (Mr. Trotter) oversees this facility Casa Blanca WWTP (NM0030678) and Rio Puerco WWTP (NM0030686) on an individual employee basis full-time. These two (2) facilities are located approximately 30-miles apart. Additionally, he (Trotter) is responsible for sample collection and operation and maintenance (O&M) associated with both facilities.

- A Supervisory Control and Data Acquisition (SCADA) system provides around the clock monitoring of WWTP operations.
- Effluent totalizing flow meter readings are recorded daily.
- The WWTP maintains three (3) lift station (LS) (**Table 1** above).
- The WWTP currently does utilize sulfur dioxide for de-chlorination of the effluent prior to discharge at Outfall 001. Furthermore, pursuant to a discussion with Mr. Trotter regarding types of disinfection and sampling equipment. He inquired about utilizing an ultraviolet (UV) disinfection system in conjunction with an automatic sampling unit given his time constraints operating both systems.

Section III – AREAS OF CONCERN

A review of the ICIS database for the period from November 19, 2019, to September 13, 2022 (**Appendix 2**) indicates NPDES permit excursions.

- NPDES permit excursion- Biochemical Oxygen Demand- 5 day (BOD₅) (percent removal)- December 31, 2019.

Additional Area of Concern

- The operator (Mr. Trotter) oversees this facility Casa Blanca WWTP (NM0030678) and Rio Puerco (NM0030686) on an individual employee basis full-time 24-hour per day 365 days per year.
- Additionally, he (Trotter) is responsible for sample collection and operation and maintenance (O&M) associated with both facilities.
- Lift Station WWTP#2 located approximately North and outside the fenced perimeter lacks secure perimeter fencing, alarms (either audible or flashing light) or signage.
- Lift Station-Burger King located within the restaurant drive-thru lacks ready access for servicing and/or routine maintenance.

Section IV- RECOMMENDATIONS

1. Additional certified facility staff to assist in the day-to-day operations of both facilities and to address potential absence due to illness or personal time off (PTO) issues.
2. Pursuant to the discussion with Mr. Trotter regarding types of disinfection, sampling equipment and given his time constraints operating both systems. It might be beneficial for LDC to research

acquisition and installation of an ultraviolet (UV) disinfection system in conjunction with an automatic sampling unit.

EPA Region 6 inspector David Esparza conducted a closing conference at the Casa Blanca WWTP on September 13, 2022, for the inspection.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on September 13, 2022.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 5 photos taken 09/13/2022

Appendix 2 – Review of the Integrated Compliance Information System (ICIS) Database for the period from November 19, 2019, to September 13, 2022

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Laguna Development Corporation / Casa Blanca WWTP/Dancing Eagle Casino WWTP		
City: Pueblo of Laguna	County/Parish: Cibola	State: New Mexico



View of Lift Station (LS) WWTP#1 located at the approximate Northwest corner inside WWTP fenced perimeter. (DSCN1653). September 13, 2022. Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Laguna Development Corporation / Casa Blanca WWTP/Dancing Eagle Casino WWTP		
City: Pueblo of Laguna	County/Parish: Cibola	State: New Mexico



View of LS WWTP#1 with hatchway open and safety gate in-place. (IMG0138). September 13, 2022.
Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Laguna Development Corporation / Casa Blanca WWTP/Dancing Eagle Casino WWTP		
City: Pueblo of Laguna	County/Parish: Cibola	State: New Mexico



View of control panel of the Burger King Lift Station located along the West side of drive-thru next to the building. (IMG0140). September 13, 2022. Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Laguna Development Corporation / Casa Blanca WWTP/Dancing Eagle Casino WWTP		
City: Pueblo of Laguna	County/Parish: Cibola	State: New Mexico



View of the Burger King Lift station vaults located within the drive-thru next to the building. (IMG0142).
September 13, 2022. Photographed by D. Esparza West side of drive-thru next to building



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Laguna Development Corporation / Casa Blanca WWTP/Dancing Eagle Casino WWTP		
City: Pueblo of Laguna	County/Parish: Cibola	State: New Mexico



View of Lift Station (LS) WWTP#2 located approximately North and outside of WWTP fenced perimeter (DSCN1658). September 13, 2022. Photographed by D. Esparza

Appendix 2

A Review of the Integrated Compliance Information
System (ICIS) Database
for
the period from
November 19, 2019, to September 13, 2022

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List of Violations Related to the Permit

						Record Numbers 1 to 39
Violation Type	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Action
Schedule Violation	1 P QUMTR Quarterly Monitoring Report	C40	03/30/2022	N-04/30/2022	1-04/30/2022	
Schedule Violation	1 P QUMTR Quarterly Monitoring Report	C40	06/30/2022	N-07/31/2022	1-07/31/2022	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 Q1	D90	11/30/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 Q2	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C2	D90	11/30/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C3	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00400 pH Effluent Gross Season ID:0 C1	D90	11/30/2019			
DMR Non-Receipt Violation	001 A 00400 pH Effluent Gross Season ID:0 C3	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 Q1	D90	11/30/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 Q2	D90	11/30/2019	K-02/28/2020	2-05/05/2020	

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DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 C2	D90	11/30/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 C3	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q1	D80	11/30/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q2	D80	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 50060 Chlorine, total residual Disinfection, Process Complete Season ID:0 C3	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C2	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C3	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 81010 BOD, 5-day, percent removal Effluent Gross Season ID:0 C1	D90	11/30/2019			
DMR Non-Receipt Violation	001 A 81011 Solids, suspended percent removal Effluent Gross Season ID:0 C1	D90	11/30/2019			
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 Q1	D90	12/31/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 Q2	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C2	D90	12/31/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C3	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00400 pH Effluent Gross Season ID:0 C1	D90	12/31/2019			
DMR Non-Receipt Violation	001 A 00400 pH Effluent Gross Season ID:0 C3	D90	12/31/2019	K-02/28/2020	2-05/05/2020	

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DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 Q1	D90	12/31/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 Q2	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
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DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 C3	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q1	D80	12/31/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q2	D80	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 50060 Chlorine, total residual Disinfection, Process Complete Season ID:0 C3	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C2	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C3	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 81010 BOD, 5-day, percent removal Effluent Gross Season ID:0 C1	D90	12/31/2019			
DMR Non-Receipt Violation	001 A 81011 Solids, suspended percent removal Effluent Gross Season ID:0 C1	D90	12/31/2019			
DMR Non-Receipt Violation	001 Q 70295 Solids, total dissolved Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 61211 Enterococci Effluent Gross Season ID:0 C2	D90	12/31/2021	N-02/28/2022	1-02/28/2022	
DMR Non-Receipt Violation	001 Q 70295 Solids, total dissolved Effluent Gross Season ID:0 Q2	D80	12/31/2021	K-02/28/2022	1-02/28/2022	

Record Numbers 1 to 39

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