

INSPECTION REPORT

Inspection Entry Date/Time	08/02/2023 09:10 AM (MT)	Announced: No
Inspection Exit Date/Time	08/02/2023 02:20 PM (MT)	Access: Granted
Weather		
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, WWTP	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Permittee Name	City of Raton	
Facility or Site Name	City of Raton	
Facility/Site Physical Address	1750 East Hereford Ave.	
City, State, Zip Code	Raton, NM 87740	
County/Borough/Parish	Colfax Conty	
Facility GPS Coordinates	36.85979, -104.431951	
Mailing Address (If different)		
City, State, Zip Code		
FRS ID	110000734572	
Permit Number(s) (If Applicable)	NM0020273	
SIC and/or NAICS	4952	
Regulatory Representatives Participating in Inspection:		
Title	Name	Organization
Program Manager, Point Source Regulation Section	Susan A. Lucas Kamat	NMED
Lead Inspector:		
Kenneth Aubuchon	KENNETH AUBUCHON  Digitally signed by KENNETH AUBUCHON Date: 2023.11.08 12:38:13 -06'00'	
	EPA REGION 6	aubuchon.kenneth@epa.gov (281) 983-2151
Supervisor Review:		
Roberto Bernier	ROBERTO BERNIER  Digitally signed by ROBERTO BERNIER Date: 2023.11.08 13:09:38 -06'00'	
	EPA REGION 6	bernier.roberto@epa.gov (214) 665-8376

SECTION I – INTRODUCTION**Site Entry and Inspection Objectives**

EPA REGION 6 Lead Inspector, Kenneth Aubuchon, arrived at the City of Raton (the “Site” or “Facility”), located at 1750 East Hereford Ave., Raton, NM 87740, at 09:10 AM (MT) on 08/02/2023 for an unannounced inspection. EPA REGION 6 Lead Inspector presented credentials to Lloyd Wakefield and informed them that this was an EPA REGION 6 inspection to determine compliance as authorized by Clean Water Act (CWA) Section 308 and implementing regulations. This report is based on information supplied by City of Raton representatives, direct observations made by the EPA REGION 6 inspector, records and reports maintained by the permittee and other information including: photographs taken by EPA REGION 6 inspector(s), physical evidence collected by the EPA REGION 6 inspector(s), measurements taken by EPA REGION 6 inspector(s), verbal or written statements made by information supplied by City of Raton representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA REGION 6 inspector(s) by City Of Raton representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of EPA, State, and/or public records may be included in this report.

At the opening meeting, inspection objectives were covered. Mr. Wakefield explained that he was a level 4 operator and that the city was losing the public works director soon. Mr. Wakefield explained that the facility had been issued a new permit and the facility re-uses thru a state permit 92% - 98% of its discharge.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA REGION 6	Kenneth Aubuchon	Lead Inspector	Yes	Yes
City of Raton	Lloyd Wakefield	Lead Operator - Level 4	Yes	Yes
NMED	Susan A. Lucas Kamat	Program Manager, Point Source Regulation Section	Yes	Yes

Facility/Site Description

EPA REGION 6 lead inspector confirmed the following facility information:

The facility is located at 420·East Hereford Avenue, Raton, Colfax County, New Mexico. The facility has a design flow capacity of 0.9 MGD serving a residential population of 6885.

The Raton Wastewater Treatment Plant (WWTP) consists of the headworks including a screw pump/auger and grit removal, SBR basins and UV disinfection, as well as a reuse system to irrigate the city's golf course. A splitter box and retention basin are located on site for this purpose, and the effluent is chlorinated in the line on the way out to the golf course. Influent enters the headworks through a 9" Parshall flume. Grit and solids removal take place after entry into the system, and the grit and rags from the influent are collected in a container that is later disposed in a landfill. The flow then enters a splitter box where it is evenly divided between two basins of the SBR. These two units run in parallel.

The water enters equalization chambers after leaving the splitter box. This gives the operator control of the wastewater level s in the reactor basins. In the first phase, the water fills the reactor chambers. The water entering the chambers mixes with the biomass that has settled from the last treatment phase. Once the chambers are full, in the second phase, air is added to the mixture through fine bubble diffusers to facilitate biological growth and waste reduction/treatment of the wastewater. In the third phase, the air is turned off and the treated wastewater can settle. In the decant phase, the now clarified effluent is discharged from this part of the plant. The total cycle run time is 289 minutes and this cycle runs 5 times per day.

The effluent is then sent through a UV treatment system. This is an enclosed UV system where the bulbs are fixed and are periodically cleaned, manually, with an internal scrubber, which is part of the unit. This system is housed below ground and has been enclosed within a building to protect it from the elements. After disinfection by UV, the water proceeds to the outfall. It is measured by a 6" Parshall flume and totalizer meter.

Waste sludge from the SBR basins is decanted during an idle phase, if needed, and directed to a holding basin on site. This was one of the former aeration basins from the old plant footprint. Sludge is then injected at an adjacent plot of land adjacent to the facility.

Facility/Site Information

Responsible official	Lloyd Wakefield
WWTP Approx. # of residents served	Approximately 6885 served
WWTP Design Capacity & Average Daily Flow	0.9 MGD

Location(s)

Location/Area/Sub-area	Description
1. Collection System	Collection System serves approx. 6885 people.
2. Laboratory	Facility conducts on-site analysis and uses Hall Environmental for Nitrogen and Phosphorus analysis.
3. Treatment System	The Raton Wastewater Treatment Plant (WWTP) consists of the headworks including a screw pump/auger and grit removal, SBR basins and UV disinfection, as well as a reuse system to irrigate the city's golf course.
4. Sludge	Waste sludge from the SBR basins is decanted during the idle phase and is directed to a holding basin on site. This was one of the former aeration basins from the old plant footprint. Sludge is then surface injected at an adjacent 20 Acre plot of land.
5. Discharge	The facility discharge is to Doggett Creek, thence to Raton Creek, thence to Chicorica Creek, thence to Canadian River. The Doggett Creek is an unclassified perennial water below the discharge point. The discharge is located at Latitude 36° 52' 13.91" N and Longitude 104° 25' 39.18" W, in Colfax County, New Mexico.

SECTION II – OBSERVATIONS

Location: 1. Collection System		
Observation #: KA1-OB-001	Date: 11/07/2023	Weather:
At the time of the inspection SSOs (Sanitary Sewer Overflows) were not being reported as required by permit. 24-Hour Reporting of SSOs was not conducted as required in permit.		

Location: 3. Treatment System		
Observation #: KA1-OB-002	Date: 11/07/2023	Weather:
A TMDL for nutrients was approved by the NMWQCC August 14, 2019. Under the Temporary Standard promulgated by the New Mexico Water Quality Control Commission and approved by EPA Region 6 at 20.6.4.318 NMAC, the term to achieve 30-day average limits of 8 mg/L TN and 1.6 mg/L TP is 20 years. The target completion date is January 2040. The permittee shall make diligent efforts to ensure progress is being made in achieving the temporary standard by the target completion date. These efforts shall include both operation optimization and modification of the existing treatment facility. They shall be conducted in two phases. Generally, Phase 1 consists of coagulation selection/incorporation and process upgrades, if any, for phosphorous removal and Phase 2 includes the facility aeration control upgrades for nitrogen removal. The portion of the compliance schedule applicable during this 5-year permit term is included here. The permittee shall comply with the schedule of activities and shall submit a progress report to both EPA and NMED outlining the status of the phase activities during the months of January, April, July, and October, of each year. The report of progress shall also include an explanation for delays, if applicable, and proposed remedial actions. No reports were provided at the time of the inspection.		
Photo(s) 1. P1011057.JPG 2. P1011058.JPG		

SECTION III – RECORDS REVIEW**SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS**

No sampling was conducted.

SECTION V - AREA OF CONCERN

Area(s) of Concern may not be in sequential order.

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: KA1-OB-001	Location: 1. Collection System
Regulation and/or Permit Requirement	
NPDES Permit NM0020273 Part I. D. Overflow Reporting	

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 that 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 that 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.

AOC:

At the time of the inspection SSOs (Sanitary Sewer Overflows) were not being reported as required by permit. 24-Hour Reporting of SSOs was not conducted as required in permit.

Additional Notes:**AOC Reference #: KA1-OB-002****Location: 3. Treatment System****Regulation and/or Permit Requirement**

NPDES Permit NM0020273 Part I. B. Schedule of Compliance

Under the Temporary Standard promulgated by the New Mexico Water Quality Control Commission and approved by EPA Region 6 at 20.6.4.318 NMAC, the term to achieve 30-day average limits of 8 mg/L TN and 1.6 mg/L TP is 20 years. The target completion date is January 2040. The permittee shall make diligent efforts to ensure progress is being made in achieving the temporary standard by the target completion date. These efforts shall include both operation optimization and modification of the existing treatment facility. They shall be conducted in two phases. Generally, Phase 1 consists of coagulation selection/incorporation and process upgrades, if any, for phosphorous removal and Phase 2 includes the facility aeration control upgrades for nitrogen removal. The portion of the compliance schedule applicable during this 5-year permit term is included here. The permittee shall comply with the following schedule of activities:

<u>I. Phase 1 Activities</u>	<u>Target Completion Date</u>
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Incorporation of chemical addition into facility's treatment scheme

1. Continue optimization efforts of existing system, PER for SBR upgrades to achieve nutrient removal goal, coagulation selection thru pilot testings, and conduct a zero-discharge feasibility study;

January 2023

- a. The permittee shall submit a progress report to both EPA and NMED outlining the status of the phase activities during the months of January, April, July, and October, of each year.
- b. The report of progress shall also include an explanation for delays, if applicable, and proposed remedial actions.

AOC:

A TMDL for nutrients was approved by the NMWQCC August 14, 2019. Under the Temporary Standard promulgated by the New Mexico Water Quality Control Commission and approved by EPA Region 6 at 20.6.4.318 NMAC, the term to achieve 30-day average limits of 8 mg/L TN and 1.6 mg/L TP is 20 years. The target completion date is January 2040. The permittee shall make diligent efforts to ensure progress is being made in achieving the temporary standard by the target completion date. These efforts shall include both operation optimization and modification of the existing treatment facility. They shall be conducted in two phases. Generally, Phase 1 consists of coagulation selection/incorporation and process upgrades, if any, for phosphorous removal and Phase 2 includes the facility aeration control upgrades for nitrogen removal. The portion of the compliance schedule applicable during this 5-year permit term is included here. The permittee shall comply with the schedule of activities and shall submit a progress report to both EPA and NMED outlining the status of the phase activities during the months of January, April, July, and October, of each year. The report of progress shall also include an explanation for delays, if applicable, and proposed remedial actions. No reports were provided at the time of the inspection.

Additional Notes:**SECTION VI – CLOSING CONFERENCE AND FOLLOW UP****Closing Conference**

The EPA REGION 6 Lead Inspector held a closing conference with Facility personnel at 02:20 PM (MT) on 08/02/2023 for the inspection. During the closing conference, EPA REGION 6 Lead Inspector discussed the observations and Area(s) of Concern identified during the inspection. Observations and Area(s) of Concern have not yet been evaluated for a formal compliance determination.

Follow Up

I observed no follow up at the time of the inspection.

No follow up was required after exiting the facility on 08/02/2023.

Communication Log

No additional information received by EPA REGION 6 after exiting the Facility on 09/02/2023.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



Influent Flow Meter			P1011056.JPG
08/02/2023	No CBI	No PII	Photographer: Kenneth AuBuchon
Reading at time of the inspection			



ICEAS Basin #2			P1011057.JPG
08/02/2023	No CBI	No PII	Photographer: Kenneth AuBuchon
3. Treatment System			
SBR ICEAS Basin #2 at the time of the inspection.			



ICEAS Basin #1			P1011058.JPG
08/02/2023	No CBI	No PII	Photographer: Kenneth AuBuchon
3. Treatment System			
SBR ICEAS Basin #1 at the time of the inspection.			



Equalization Basin			P1011059.JPG
08/02/2023	No CBI	No PII	Photographer: Kenneth AuBuchon
Equalization Basin at the time of the inspection.			



Sludge Application Field			P1011060.JPG
08/02/2023	No CBI	No PII	Photographer: Kenneth AuBuchon
Sludge application field at the time of the inspection.			



Discharge			P1011062.JPG
08/02/2023	No CBI	No PII	Photographer: Kenneth AuBuchon
Discharge at the time of the inspection.			



Discharge			P1011063.JPG
08/02/2023	No CBI	No PII	Photographer: Kenneth AuBuchon
Discharge at the time of the inspection			

APPENDIX 2: DOCUMENT LOG

(NONE)