

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/27/2025	
Media Program:	Water	
Regulatory Program(s)	CWA	
Company Name:	Village of Taos Ski Valley	
Facility Name:	Taos Ski Valley WWTP	
Facility Physical Location:	101 Ocean Boulevard	
(city, state, zip code)	Village of Taos Ski Valley, New Mexico 87525	
Mailing address:	Post Office Box 100	
(city, state, zip code)	Taos Ski Valley, New Mexico 87525	
County/Parish:	Taos	
Facility Phone Number	575-776-8220	
Facility Contact:	Kevin Cisneros	WWTP Operator
	kevin@vtsv.org	
FRS Number:	110002047197	
Identification/Permit Number:	NM0022101	
Media Identifier Number:	NA	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Kevin Cisneros	Village of Taos Ski Valley	WWTP Operator
Damean Crenen	Village of Taos Ski Valley	WWTP Operator
Josiah Griego	Village of Taos Ski Valley	WWTP Operator
David Esparza	EPA-R6/ECDWM	Environmental Engineer
EPA Lead Inspector Signature/Date		
	David Esparza	Date
Supervisor Signature/Date		
	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (EPA) Region 6 inspector David Esparza, PE, arrived at the Village of Taos Ski Valley (Taos Ski Valley) Wastewater Treatment Plant (WWTP) at approximately 8:30 AM on March 27, 2025, for an unannounced inspection. I (David Esparza) presented my credentials to Mr. Kevin Cisneros, Lead Wastewater Operator of Taos Ski Valley and informed him that this was an EPA inspection to determine the facility's compliance under the Clean Water Act (CWA) and the requirements 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 Taos Ski Valley representatives, observations made by the EPA inspector, NMED, and records and reports maintained by the permittee (Taos Ski Valley), and the EPA. Before leaving the facility on March 27, 2025, an exit briefing was held with Mr. Cisneros, to explain areas of concern noted at the time of the inspection. It should be noted the WWTP also maintains a discharge permit (DP-1383) issued by the New Mexico Environment Department (NMED), Groundwater Quality Bureau (GWQB) in conjunction with sewage sludge disposal.

FACILITY DESCRIPTION

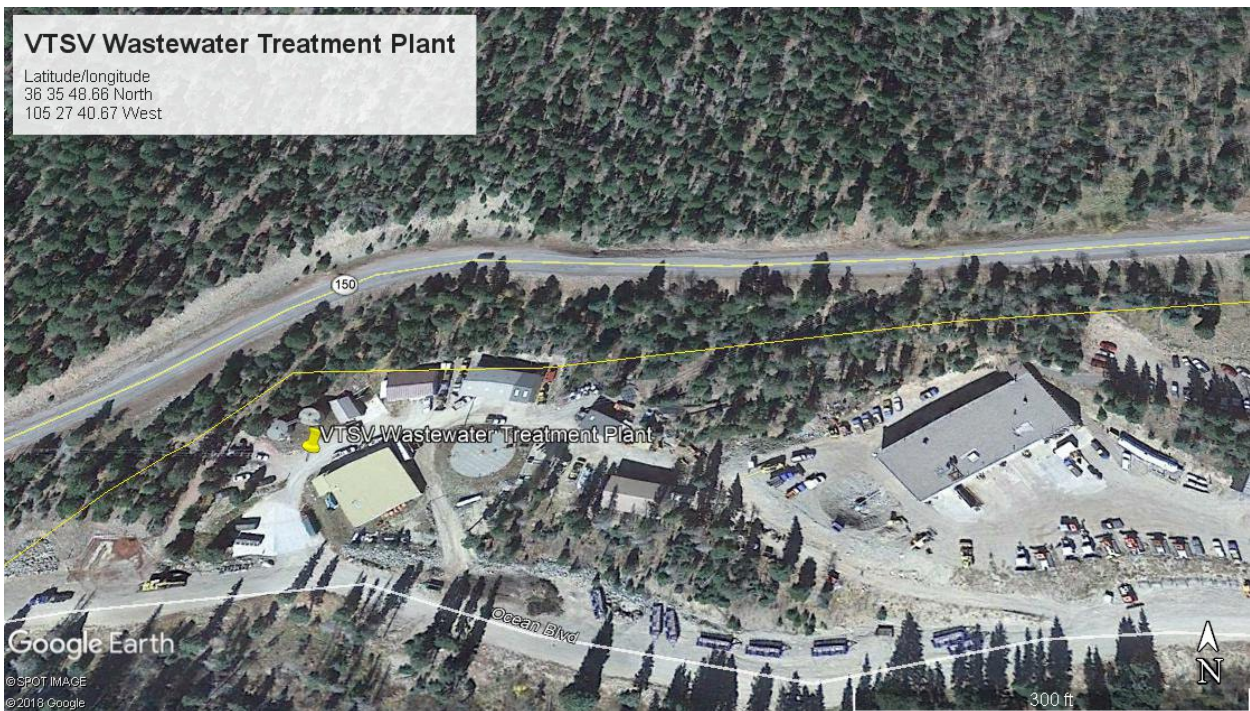
The Village of Taos Ski Valley (VTSV) WWTP facility is classified as a minor discharger with a design capacity of 0.9 MGD serving a year-round population of approximately 500 people and a peak tourist population of approximately 5,000. The facility is located at 38 Ocean Boulevard Taos Ski Valley, Taos County New Mexico or approximately 0.36-miles west of the Village Administration Office, between New Mexico State Road (SR) 150 and Ocean Boulevard in Taos Ski Valley, Taos County, New Mexico (denoted in Aerial Image #1 below). Approximate coordinates to the VTSV WWTP facility are Latitude 36°35'48.66" North, Longitude 105°27'40.67" West. Site hours of operation are Monday through Friday 7am to 5pm.

The existing WWTP is located inside a building to protect it from inclement weather during the winter months. The WWTP treatment process is comprised of a gravity collection system, one (1) lift station (identified in Table #1), headworks comprised of a grit removal system with a screw pump and bagging system. Flow from the headworks then traverses through a flow control box; thence to two (2) in-ground equalization (EQ) basins, i.e., an anoxic EQ basin with mixers and a steel EQ basin.

The WWTP maintains the following basins which were retrofitted from the existing treatment facility. This includes one (1) Pre-Anoxic Zone (PAX) basin of approximately 24K-gallons (existing tank) which flows into the one (1) Pre-Aeration Zone (PAI) basin of approximately 71K-gallons (existing tank). Flow is separated into two (2) parallel treatment trains. Each train consists of one (1) Pre-Aeration Zone tank of approximately 30K-gallons (existing tanks) which flow into the following process zones. One (1) Post-Anoxic Zone (AXP) basin of 29K-gallons per train which flow into one (1) Membrane Zone (MBR) basin of approximately 21K-gallons. Solids from the MBR basin are returned to the Pre-Anoxic Zone basin. The

permeate water thence traverses through two (2) ultraviolet (UV) disinfection units per train prior to discharge to the Rio Hondo, a tributary of the Rio Grande. The WWTP utilizes an Alfa Laval centrifuge located within the dewatering building prior to discharging to the sludge pad. Final disposal of the sludge is at the Taos County Regional Landfill or Rio Rancho Landfill.

In June 2019 an improvement project included the placement of an Ovivo Membrane Bioreactor (MBR) system that provides primary treatment in the WWTP. This MBR system is comprised of two (2) treatment trains including an upgraded ultra-violet (UV) disinfection system that has two (2) banks of three (3) modules for each treatment train and Supervisory Control and Data Acquisition (SCADA) instrumentation.



Aerial Image #1: Overall view of the Village of Taos Ski Valley's Wastewater Treatment Plant. Aerial from Google Earth maps.

Table 1: Village of Taos Ski Valley Lift Stations

	Lift Station	Address
1	Kachina	104 Kachina Road

Taos Ski Valley has written policies and procedures to address potential sanitary sewer overflows (SSOs), and standard operating procedures (SOPs) pertaining to facility operations and maintenance (O&M) and a current Fats, Oils and Grease (FOG) program policy regarding existing and new FOG contributors. Additionally, their utility Asset Management Plan was updated.

Currently, there is no Industrial Users (IU) or satellite communities contributing to the WWTP.

Section II – OBSERVATIONS

I observed the following and/or the following information was provided or stated on March 27, 2025.

- It was stated that Mr. Drew Padilla, Prodigy Builders, Inc. was the contract operator for VTSV, and he was on-site approximately 2 times per month.
- The previous June 2019 improvements, which included upgrades to the disinfection system, a Supervisory Control and Data Acquisition (SCADA) instrumentation, and placement of an Ovivo Membrane Bioreactor (MBR) system; continue to provide improved treatment monitoring and operation.
- The WWTP maintains an on-site generator for backup power that is routinely exercised every week.
- The previously observed stockpiled sludge remains on-site. It appears new sludge material has been added to the stockpiled sludge.
- Overall operation and maintenance (O&M) of the WWTP appeared to be satisfactory. All equipment looked to be running properly.
- Regarding the identified submitted Integrated Compliance Information System (ICIS) Discharge Monitoring Reports (DMR) data for the period of January 21, 2022, through December 31, 2024, the WWTP stated they were attempting the following actions:
 1. Nitrogen as Ammonia- increasing the air to reduce the Total Nitrogen
 2. Total Phosphorus- adding aluminum sulfate
 3. 5-day Biological Oxygen Demand (BOD₅)- adding a slurry of molasses syrup
 4. pH- adding caustic soda and liquid

Section III – AREAS OF CONCERN

- A review of the submitted Integrated Compliance Information System (ICIS) Discharge Monitoring Reports (DMR) data for the period January 21, 2022, through December 31, 2024, indicates NPDES permit exceedances with respect to Nitrogen and Phosphorus, as well as 5-day Biological Oxygen Demand (BOD₅) and pH (Appendix 1 ICIS E90 Effluent Violations).

EPA Region 6 inspector David Esparza conducted a closing conference at the Village of Taos Ski Valley's WWTP at approximately 11:30 AM on March 27, 2025, for the inspection.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on March 27, 2025.

Section V – LIST OF APPENDICES

Appendix 1 – ICIS E90 Effluent Violations

Appendix 1
Review
of the
ICIS
E90 Effluent Violations

E90 Effluent Violations From 01/01/2019 - Present

NM0022101

TAOS SKI VALLEY, VILLAG

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
01/31/2022	001	A	Nitrogen, ammonia total [a	7 DA AVG	lb/d	5.34	=	6.41	2
01/31/2022	001	A	Nitrogen, ammonia total [a	7 DA AVG	mg/L	3.2	=	11	2
01/31/2022	001	A	Nitrogen, total [as N]	7 DA AVG	mg/L	12.3	=	17.3	1
02/28/2022	001	A	Phosphorus, total [as P]	7 DA AVG	mg/L	.75	=	.85	1
03/31/2022	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	.8	=	1.34	10
03/31/2022	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	.5	=	2.44	10
03/31/2022	001	A	Phosphorus, total [as P]	7 DA AVG	lb/d	1.2	=	2.35	10
03/31/2022	001	A	Phosphorus, total [as P]	7 DA AVG	mg/L	.75	=	4.1	10
04/30/2022	001	A	Phosphorus, total [as P]	7 DA AVG	mg/L	.75	=	1.1	1
05/31/2022	001	A	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30	=	41	1
05/31/2022	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	=	16.33	1
01/31/2023	001	A	Nitrogen, ammonia total [a	30DA AVG	mg/L	3.2	=	3.63	3

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
01/31/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	lb/d	5.34	=	5.56	3
01/31/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	mg/L	3.2	=	8.4	3
01/31/2023	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8.2	=	9.53	2
01/31/2023	001	A	Nitrogen, total [as N]	7 DA AVG	mg/L	12.3	=	13.3	2
02/28/2023	001	A	Nitrogen, ammonia total [a	30DA AVG	mg/L	3.2	=	8.59	2
02/28/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	lb/d	5.34	=	14.56	2
02/28/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	mg/L	3.2	=	24	2
02/28/2023	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8.2	=	12.73	0
02/28/2023	001	A	Nitrogen, total [as N]	7 DA AVG	mg/L	12.3	=	26.41	0
03/31/2023	001	A	Nitrogen, ammonia total [a	30DA AVG	lb/d	5.34	=	20.42	12
03/31/2023	001	A	Nitrogen, ammonia total [a	30DA AVG	mg/L	3.2	=	34.4	12
03/31/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	lb/d	5.34	=	29.02	12
03/31/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	mg/L	3.2	=	44	12
03/31/2023	001	A	Nitrogen, total [as N]	30DA AVG	lb/d	13.65	=	21.3	10
03/31/2023	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8.2	=	35.88	10
03/31/2023	001	A	Nitrogen, total [as N]	7 DA AVG	lb/d	20.5	=	29.83	10
03/31/2023	001	A	Nitrogen, total [as N]	7 DA AVG	mg/L	12.3	=	45.22	10
03/31/2023	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	.5	=	.95	6
03/31/2023	001	A	Phosphorus, total [as P]	7 DA AVG	lb/d	1.2	=	1.25	6

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
03/31/2023	001	A	Phosphorus, total [as P]	7 DA AVG	mg/L	.75	=	1.9	6
04/30/2023	001	A	Nitrogen, ammonia total [a	30DA AVG	mg/L	3.2	=	5.5	3
04/30/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	lb/d	5.34	=	7.12	3
04/30/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	mg/L	3.2	=	21	3
04/30/2023	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8.2	=	8.92	3
04/30/2023	001	A	Nitrogen, total [as N]	7 DA AVG	mg/L	12.3	=	24.13	3
08/31/2023	001	A	Nitrogen, ammonia total [a	30DA AVG	lb/d	5.34	=	6.56	4
08/31/2023	001	A	Nitrogen, ammonia total [a	30DA AVG	mg/L	3.2	=	18	4
08/31/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	lb/d	5.34	=	6.56	4
08/31/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	mg/L	3.2	=	18	4
08/31/2023	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	16.6	=	19.16	1
08/31/2023	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	1.2	=	3.02	4
08/31/2023	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1.5	=	8.3	4
08/31/2023	001	A	Phosphorus, total [as P]	7 DA AVG	lb/d	1.8	=	3.02	4
08/31/2023	001	A	Phosphorus, total [as P]	7 DA AVG	mg/L	2.25	=	8.3	4
09/30/2023	001	A	Nitrogen, ammonia total [a	30DA AVG	lb/d	5.34	=	13.98	
09/30/2023	001	A	Nitrogen, ammonia total [a	30DA AVG	mg/L	3.2	=	33	
09/30/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	lb/d	5.34	=	13.98	
09/30/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	mg/L	3.2	=	33	

Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value Qualifier Code	DMR Value	Reported Number of Excursions
09/30/2023	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	12.7	=	34	
09/30/2023	001	A	Nitrogen, total [as N]	7 DA AVG	mg/L	19	=	34	
09/30/2023	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	.8	=	6.36	
09/30/2023	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	2.5	=	15	
09/30/2023	001	A	Phosphorus, total [as P]	7 DA AVG	lb/d	1.2	=	6.36	
09/30/2023	001	A	Phosphorus, total [as P]	7 DA AVG	mg/L	3.75	=	15	
10/31/2023	001	A	pH	MINIMUM	SU	6.6	=	6.42	22
12/31/2023	001	A	Nitrogen, ammonia total [a	7 DA AVG	mg/L	3.2	=	4	2
02/29/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	.5	=	.57	3
02/29/2024	001	A	Phosphorus, total [as P]	7 DA AVG	mg/L	.75	=	.88	3
03/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	.5	=	1.25	2
03/31/2024	001	A	Phosphorus, total [as P]	7 DA AVG	mg/L	.75	=	1.3	2
04/30/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	.5	=	1.74	2
04/30/2024	001	A	Phosphorus, total [as P]	7 DA AVG	mg/L	.75	=	3	2
06/30/2024	001	A	pH	MINIMUM	SU	6.6	=	6.38	19
10/31/2024	001	A	BOD, 5-day, percent remo	MO AV MN	%	85	<	95.14	2
12/31/2024	001	A	Nitrogen, ammonia total [a	7 DA AVG	mg/L	3.2	<	3.8	3