

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	05/13/2025	
Media Program:	Water	
Regulatory Program(s)	NPDES	
Company Name:	City of Tucumcari	
Facility Name:	Tucumcari Wastewater Treatment Plant	
Facility Physical Location:	1700 North Rock Island Street	
(city, state, zip code)	Tucumcari, New Mexico	
Mailing address:	Post Office Box 1188	
(city, state, zip code)	Tucumcari, New Mexico 87321	
County/Parish:	Quay	
Facility Phone Number	575-461-4542	
Facility Contact:	Calvin Henson	Wastewater Superintendent
	wastewater@cityoftucumcari.com	
FRS Number:	110000762354	
Identification/Permit Number:	NM0020711	
Media Identifier Number:	NA	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Calvin Henson	City of Tucumcari	Wastewater Superintendent
Stephen Salas	City of Tucumcari	Public Works Director
Janet Garcia	City of Tucumcari	Laboratory Director
David Esparza	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

EPA Region 6 inspector David Esparza, PE arrived at the City of Tucumcari Wastewater Treatment Plant (WWTP) (Tucumcari) at approximately 8:00 AM on May 13, 2025, for an unannounced inspection. I met with Mr. Calvin Henson, Wastewater Superintendent, Mr. Stephen Salas, Public Work Director and Ms. Janet Garcia, Laboratory Director presented my credentials and informed them that this was an EPA inspection to determine the Tucumcari WWTP's (Tucumcari) 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 Tucumcari representatives, observations made by the United States Environmental Protection Agency (US EPA) inspector, and records and reports maintained by the permittee (Tucumcari), and the US EPA. Before leaving the facility, an exit briefing was held at 11:30 AM with the above representatives of the City of Tucumcari to explain areas of concern noted at the time of the inspection.

FACILITY DESCRIPTION

The WWTP is a major discharger with a design flow capacity of 1.2 MGD (million gallons per day) and an average influent flow of 0.4 MGD. The facility is located at 1700 North Rock Island Street, Tucumcari, Quay County, New Mexico (depicted in **Aerial Site Image #1** below). The WWTP also accepts approximately 3,500-gallons per day of septage from permitted waste haulers. The facility serves a population of approximately 5,000 residents and is operated by staff within the Public Works Department consisting of 5 full-time equivalent (FTE) positions, during the hours of 7:00 AM to 4:00 PM five (5) days during the regular work week and 1 FTE on weekends. On-call staff is available on an as needed basis.



Aerial Site Image #1: Overall view of the City of Tucumcari Wastewater Treatment Plant

The WWTP discharges its disinfected effluent through a closed conduit pipe to a point within Breen Pond located approximately 2-miles from the WWTP (located approximately at a point described as

Latitude/Longitude 35° 13' 09.18" N, 103° 42' 16.69"W), overflow from the pond traverses to No Name Creek, thence travels approximately one mile to Pajarito Creek, a tributary to the Canadian River.

Construction of the new WWTP Medium Rate Activated Sludge facility (MRAS) was completed in 2011 and was a replacement for the original WWTP built in 1982. These upgrades included construction of a water reuse storage pond, pump station, and a pipeline for a water conservation and reuse projects. This upgraded system is a conventional activated sludge process that also incorporates biological nutrient removal. The previous improvements also included upgrades to the headworks, new splitter boxes, rehabilitation of the primary clarifiers, new MRAS basins, secondary clarifiers, two (2) banks of Trojan ultraviolet (UV) disinfection units, a blower/pump building, sludge drying and composting pads, and a new laboratory and administration building. Rehabilitation of the anaerobic and aerobic sludge digesters included replacement of the floating roof with a fixed roof over the anaerobic digester and reinforcement/repairs to the concrete structures.

Currently the WWTP has completed phase 2 of their wastewater Effluent Reuse Project. Upon project completion the reuse project will include the installation of new effluent lift pumps to convey Class 1B effluent from the existing facility to two (2) onsite storage ponds, one (1) existing (3 million gallons) and one (1) new (4 million gallons) for a total combined storage of 7 million gallons. The Reuse project also includes installation of Reuse Booster Pumps that will draw from the pond storage and pump via closed conduit pipeline to irrigation pivots at the New Mexico State University (NMSU) property (an existing operation) and the Smith property (new). At the Smith property, three (3) new irrigation pivots will be installed to reuse the Class 1B effluent water the WWTP is producing. Additional electrical upgrades will be installed and power feeds for each irrigation pivot at the Smith property.

The WWTP is a gravity flow system with ten (10) lift stations (LS) (Identified in **Table 1** below). The lift stations are equipped with standby generators and automatic switchovers in the event of power loss. The generators are exercised monthly to verify system readiness. In the event of a local power outage, an emergency generator at the WWTP is available to operate most of the facility treatment processes except for the blowers. This enables the WWTP to continue the treatment process through gravity flow, unabated.

Table 1: City of Tucumcari Lift Stations

Lift Station Name	Comments/Status
54	Operational
66	Operational
KOA	Operational- proposed to be upgraded in 2023
Date Street	Operational
Rock Island	Operational
El Carro	Operational
Ridge Crest	Operational
JW	Operational
Sherwood	Stand-by
Tucumcari Truck Terminal (TTT)	Stand-by

The MRAS is a modified racetrack, having both aerobic and anoxic zones. Flow from the MRAS is sent to the reconditioned secondary clarifiers. The flow from the secondary clarifiers is combined and routed to the ultraviolet (UV) treatment building for disinfection.

To address their sludge management, the WWTP has and/or maintains three (3) concrete sludge drying beds (located approximately at the southeast end of the facility) for composting into Class A sludge for land application and/or local agricultural purposes. These beds were originally constructed with underdrains to collect excess wastewater; thus, creating the ability to pump and/or return excess wastewater to the headworks.

The one (1) previous industrial use (IU) discharger, Tucumcari Mountain Cheese Factory no longer discharges to the facility. **Note:** the cheese factory maintains a discharge permit issued by the New Mexico Environment Department (NMED), Groundwater Quality Bureau (GWQB) (renewed November 24, 2025) that allows a discharge up to 20K gallons per day (gpd) into a lined evaporation pond. This previously permitted IU facility is in addition to the proximate motels, restaurants, gas stations, and laundromats. The WWTP maintains a discharge permit (DP-1700) issued by the New Mexico Environment Department (NMED), Groundwater Quality Bureau (GWQB) that allows a discharge up to 1.2 MGD.

A Supervisory Control and Data Acquisition (SCADA) system provides around the clock monitoring of WWTP operations

Additionally, Tucumcari has implemented written policies and procedures to address any potential sanitary sewer overflow events (SSOs), and standard operating procedures (SOPs) pertaining to facility operations and maintenance (O&M), inclusive of daily (morning and evening) visual checks of the WWTP treatment processes and lift stations. These SOPs also include protocols for new hires, inclusive of testing to ensure that they can perform each step properly before advancing on their own. It is not clear whether the city, has a written protocol or mechanism in place pertaining to a Fats, Oils and Grease (FOG) program.

Section II – OBSERVATIONS

I observed or the following was stated on September 29, 2022.

- Discussed status of NPDES permit. The current permit had an effective date of January 1, 2021, and an expiration date of December 31, 2025. Mr. Henson stated he was waiting to receive laboratory results to complete the renewal application, finalize and submit for review and approval. **Note:** as of this date permit renewal application has not been submitted.
- Discussed status of reuse pond and associated parameters identified in Administrative Order (AO) Docket Number: CWA-06-2024-1719:

Total Reuse Project Schedule of Activities Table:

Project Activity	Due Date
Award Contract and Start construction	December 31, 2024
Submit construction status Project Report to EPA	July 31, 2024

Complete construction, begin total reuse process, and submit final Project Report	December 31, 2025
Achieve no discharge of Tucumcari wastewater and terminate NPDES Permit	December 31, 2025

- Mr. Hanson stated CDM-Smith was the engineer of record on the reuse project and he would confirm if the July 2024 status report had been submitted. He further stated there was a change in the project engineer at CDM that could have caused a possible delay.
- Mr. Hanson stated the reuse project had initially been delayed due to Covid and material cost increases, resulting in a shortage of available funds. However, to begin the project it was separated into phases. Phase 2- included land acquisition and completion of the sprinkler system utilizing available funds. Phase 1- set to begin construction on August 1, 2025 (new funds have been acquired) will include construction of the holding pond and pump station. **Note:** the project was/is being done in reverse order due to available funds.
- Tucumcari has implemented written policies and procedures to address any potential sanitary sewer overflow events (SSOs), and standard operating procedures (SOPs) pertaining to facility operations and maintenance (O&M), inclusive of daily (morning and evening) visual checks of the WWTP treatment processes and lift stations.
- Written protocols or mechanisms are in-place for new hires, inclusive of testing to ensure they can perform each step properly before advancing on their own.
- A Supervisory Control and Data Acquisition (SCADA) system provides around the clock monitoring of WWTP operations.
- Adequate staffing. The permittee currently maintains five (5) FTE operator positions.
- The overall housekeeping of the WWTP of the grounds and ancillary appurtenances appeared to be well maintained and in operational order.
- The WWTP did have secure perimeter fencing and lighting; thus, limiting access.

Section III – AREAS OF CONCERN

A review of the ICIS database for the period from December 31, 2022, to March 31, 2025 (**Appendix 1**) indicates NPDES permit excursions.

- A review of the Integrated Compliance Information System (ICIS) indicates several NPDES permit violations with respect to Escherichia coli (E coli) (December 31, 2022), Phosphorus (total as P) (January 31, 2024, February 29, 2024, March 31, 2024, April 30, 2024, May 31, 2024, June 30, 2024, July 31, 2024, August 31, 2024, September 30, 2024, October 31, 2024, November 30, 2024, December 31, 2024, January 31, 2025, February 28, 2025 and March 31, 2025), Nitrogen (total as N) (January 31, 2024, February 29, 2024, March 31, 2024, April 30, 2024, May 31, 2024, June 30,

2024, July 31, 2024, August 31, 2024, September 30, 2024, October 31, 2024, November 30, 2024, December 31, 2024, January 31, 2025, February 28, 2025 and March 31, 2025).

I conducted a closing conference a closing conference at City of Tucumcari WWTP on May 13, 2025, for the inspection.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on May 13, 2025.

Section V – LIST OF APPENDICES

Appendix 1 – Review of the Integrated Compliance Information System (ICIS) Database for the period from December 31, 2022, to March 31, 2025.

Appendix 2

Review
of the
ICIS database
for
the period
from
December 31, 2022, to March 31, 2025

E90 Effluent Violations From 01/01/2019 - Present

NM0020711

TUCUMCARI, CITY OF

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
12/31/2022	001	A	E. coli	DAILY MX	CFU/100	410	=	1600
01/31/2024	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	12.75
01/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	14.6
01/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	4.6
02/29/2024	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	11.25
02/29/2024	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	15.4
02/29/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	4.85
03/31/2024	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	10.98
03/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	2.35
04/30/2024	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	13.15
04/30/2024	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	15.68
04/30/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	5.15
05/31/2024	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	12
05/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	18.49
05/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	5.8
06/30/2024	001	A	Nitrogen, total [as N]	30DA AVG	lb/d	61.4	=	62.9
06/30/2024	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	19
06/30/2024	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	20.8
06/30/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	6.3
07/31/2024	001	A	Nitrogen, total [as N]	30DA AVG	lb/d	61.4	=	69.9
07/31/2024	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	20.29
07/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	18.6
07/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	5.4
08/31/2024	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	11.61
08/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	16.8
08/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	4.7

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
09/30/2024	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	14
09/30/2024	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	14.3
09/30/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	4.8
10/31/2024	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	10
10/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	17.1
10/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	4.1
11/30/2024	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	13
11/30/2024	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	17.4
11/30/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	4.8
12/31/2024	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	15
12/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	16.1
12/31/2024	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	4.9
01/31/2025	001	A	Nitrogen, total [as N]	30DA AVG	lb/d	61.4	=	70.2
01/31/2025	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	21
01/31/2025	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	13.7
01/31/2025	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	4.1
02/28/2025	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	10.5
02/28/2025	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	15.9
02/28/2025	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	4.6
03/31/2025	001	A	Nitrogen, total [as N]	30DA AVG	mg/L	8	=	10.4
03/31/2025	001	A	Phosphorus, total [as P]	30DA AVG	lb/d	7.67	=	13.1
03/31/2025	001	A	Phosphorus, total [as P]	30DA AVG	mg/L	1	=	4.2