

INSPECTION REPORT

Inspection Entry Date/Time	05/06/2024 10:00 AM (MT)	Announced: No
Inspection Exit Date/Time	05/06/2024 12:58 PM (MT)	Access: Granted
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, WWTP	
Type of Inspection	Compliance Evaluation Inspection (CEI)	
Permittee Name	Glorieta Adventure Camps	
Facility or Site Name	Glorieta Camps Wastewater Treatment Plant	
Facility/Site Physical Address	Oak Road, at Exit 299, East I-25 North	
City, State, Zip Code	Glorieta, NM 87535	
County	Santa Fe	
Facility GPS Coordinates	35.58342, -105.750592	
Mailing Address (If different)	Glorieta Adventure Camps P.O. Box 8	
City, State, Zip Code	Glorieta, NM 87535	
FRS ID	110011027389	
Permit Number(s) (If Applicable)	NM0028088	
SIC	4952 & 8661	
NAICS	221320	
Lead Inspector:		
Amy Andrews	 AMY ANDREWS c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=AMY ANDREWS, 0.9.2342.19200300.100.1.1=68001003655888 2024.07.05 08:39:14 -06'00'	
	EPA Region 6	andrews.amy@epa.gov (214) 907-0638
Supervisor Review:		
Alan Vaughn	 ALAN VAUGHN Digitally signed by ALAN VAUGHN Date: 2024.07.05 09:57:22 -05'00'	
(acting for Roberto Bernier)	EPA Region 6	vaughn.alan@epa.gov

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

As listed in the Attendees Table below, EPA Region 6 Lead Inspector, Amy Andrews, and officials from the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) arrived at the Glorieta Adventure Camps (the “Site” or “Facility”), located on Oak Road, East of Exit 299 on I-25, Santa Fe County, Glorieta, NM at 10:00 AM (MT) on 05/06/2024 for an unannounced inspection. The EPA Inspector presented credentials to the Glorieta Camps representative, Mr. Steven Rasmussen, and informed the group that this was an EPA inspection to determine compliance as authorized by Clean Water Act (CWA) Section 308 and implementing regulations. This report is based on information supplied by Glorieta Camps representative(s), direct observations made by the EPA Region 6 inspector, NMED officials, records and reports maintained by the permittee; and other information including photographs taken by the EPA Inspector, physical evidence collected by the EPA Inspector, verbal or written statements made and information supplied by Glorieta Camps representative(s) during or subsequent to the on-site Inspection; and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA inspector by Glorieta Camps 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.

Attendees Table:

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 6	Amy Andrews	Lead Inspector	Yes	Yes
Glorieta Adventure Camps	Steven Rasmussen	Water & Wastewater Manager/Operator	Yes	Yes
NMED SWQB	Nafis Fuad	Compliance Lead	Yes	Yes
NMED SWQB	Shawnee Suazo	Complex Facilities Inspector	Yes	Yes
NMED SWQB	Jason Martinez	Environmental Scientist and Specialist	Yes	Yes

Facility/Site Description

EPA lead inspector confirmed the following facility information:

The Glorieta Camps wastewater treatment plant (WWTP) is classified as a minor, privately-owned domestic discharger with a design flow of 0.4 million gallons per day (MGD) which discharges effluent into the Glorieta Creek and thence into the Pecos River. Both waterbodies are classified in Segment 20.6.4.217 NMAC of the Pecos River Basin (State of New Mexico Standards for Intrastate and Interstate Surface Waters). The designated uses are domestic water supply, fish culture, high quality cold-water aquatic life, irrigation, livestock watering, wildlife habitat and primary contact, as well as public water supply on the main stem of the Pecos River.

Domestic wastewater from Glorieta Camps and the community of Glorieta is conveyed to an activated sludge/extended aeration system with ultraviolet disinfection. Raw wastewater enters the facility headworks via gravity flow. The headworks consist of a three-track observation channel with a screen with quarter-inch gaps followed by two manual bar screens, the first one with two-inch gaps, the second with half-inch gaps, followed by an inline grit basin which allows settling solids to settle out and then be pumped to drying beds

with a manual pump. Debris, trash, grit, and other materials collected at the headworks is removed daily and eventually transported to a landfill for final disposal. The flow enters a Parshall flume prior to a series of splitter boxes and manholes. Flow can be directed from the control room to any ring of the aeration basin. The aeration basin is a three-ring orbital basin with two sets of rotating disc aerators which can be operated independently to inject air and keep mixed liquor in motion. The flow typically moves through the basin in series, but the operator can control the flow between the rings with sluice gates. Wastewater flows can be manipulated between the rings for maximum efficiency. The aeration basin also receives leachate from two separate sludge bed underdrain systems that are combined prior to reaching the basin.

Wastewater exits the aeration basin and flows into a covered clarifier unit. Return Activated Sludge (RAS) is pumped from the clarifier back to the active ring of the aeration basin and waste activated sludge (WAS) is pumped to the Imhoff tanks that are now used as sludge thickeners, and thickened sludge is sent to the drying beds. The facility plans to use all sludge compost along with food waste from the cafeteria to fertilize vegetation onsite at the 2,400-acre facility. Water leaving the clarifier flows through a pipeline that travels along the west side of Glorieta Creek. Disinfection takes place at a 16-bulb Trojan UV 3000 PTP ultraviolet (UV) system and then the effluent flow is measured by a 90° V-notch weir and staff gage with an electronic totalizing meter. Effluent compliance samples are collected at the weir. The disinfected effluent cascades down a series of concrete steps for approximately 25 feet, then into the Glorieta Creek.

Facility/Site Information

Responsible official	Anthony Scott, owner (210-844-9945)
Type of primary flow meter	Effluent primary flow meter is a 90-degree V-notch weir with an instantaneous ultrasonic flow meter.
How do you manage your biosolids?	Don't produce many biosolids, only waste every three or four months. Biosolids have been stockpiled since 2020, in anticipation of composting and using onsite. Currently sludge tanks are empty, sludge is in drying beds waiting on delivery of wood chips.
Have any bypasses or overflows happened at the plant or in the collection system in the last year?	No, however it's possible the Village of Glorieta has had SSOs that have not been reported.
Have any hydraulic overloads occurred at the plant?	No
Backup electrical power source, and does it turn on automatically?	Backup generator
What is your overflow/emergency capacity (overflow basins, holding tanks, redundancy) and do you have sufficient spare parts?	Permittee has excellent overflow/emergency storage capacity and redundancy. Facility personnel stated that they can reroute the influent into the sludge tanks for holding instead of the treatment train, which gives them 3 to 4 days of capacity during the summer, or 21 to 22 weeks in the winter when there are no campers.
How often do you visually inspect the outfall(s) and flow measuring devices?	Permittee provided records showing verification of flow measurement devices at least once a month.
Do you use in-house or contract out for laboratory analyses? (including for metals or WET testing?)	In-house analysis includes pH and temperature. Primary laboratory is Eurofins located in Albuquerque, NM (previously Hall Environmental). Facility sends to Eurofins lab monitoring samples for analysis including BOD, TSS, E coli, O&G, Specific Conductance, Phosphorus, and Nitrogen. WET Testing goes to

	BioAquatic lab in Carrollton, TX.
Operation schedule (days of operation, # shifts/day, # operators/shift, coverage overnight, weekends & emergencies), and is staffing sufficient for proper operation?	Two operators (Steven Rasmussen and Hunter Parott) work Monday to Friday from 7am to 4pm. Operators trade on call each weekend.
Outfalls: (and do the numbers, locations, and receiving waters match the permit?)	Outfall 001 that matches the permit
Contributing (or shared) Jurisdictions	Village of Glorieta - flow goes through a culvert under highway, have bar screen on other side of the highway
WWTP Approx. # of residents served	60 people onsite day of inspection. Have had retreats recently with between 150-580 people, mostly on weekends. 2780 total camp beds currently; can have up to 125 staff.
WWTP Design Capacity & Average Daily Flow	400,000 gpd; highest seen is 33,000 gpd; planning to engineer for 138,000 peak flow, average 80,000 gpd

SECTION II – OBSERVATIONS

Location: 2 - Primary and Secondary Treatment	
Observation #: AA2-OB-001	Date: 05/06/2024
During the month of March 2024 there was almost two weeks where facility personnel rerouted flow to the sludge Imhoff tanks instead of through the treatment plant. This was done in order to empty the aeration basins for rehab. No effluent flow occurred during this time; therefore no compliance samples were collected (just pH). The second monthly compliance sample that would have been taken during this time was collected early that month, so the correct number of BOD, TSS, and E. coli samples were still collected. EPA was not notified of the process change to reroute flow to the sludge tanks.	

Location: 0 - Collection System	
Observation #: AA2-OB-002	Date: 05/06/2024
Facility personnel stated that Glorieta Camps is in the process of upgrading the collection system, which should help with inflow/infiltration (I/I) issues that plague the plant after rainstorms, however they are not aware of any recent sanitary sewer overflows (SSOs). The collection system includes both Glorieta camps (domestic waste from campers, and the kitchen) and the Village of Glorieta. Several houses in Glorieta are also still on septic. There is a signed agreement with the Village of Glorieta about accepting their waste, but it used to just be an old handshake agreement with the previous owner of the camp (LifeWay). When they current owner, Anthony Scott, bought the property, he made sure the agreement was put into writing (inspector requested a copy of the agreement). The agreement also allows around four (4) loads of hauled waste from the Village of Glorieta per year, which is likely from the village residents' septic tanks. The trucked waste is put into the Imhoff sludge holding tanks and mixed with normal influent flow before trickling into the treatment basins with the rest of the influent flow.	

Location: 4 - Laboratory

Observation #: AA2-OB-003

Date: 05/06/2024

The thermometer in the lab is expired, tag says it was last calibrated 02/14/2017. Thermometers should be certified against a National Institute of Standards and Technology (NIST) calibrated thermometer at least once per year.

In-house analysis includes pH and temp. The primary laboratory is Eurofins located in Albuquerque, NM (previously Hall Environmental). The facility sends Eurofins samples for analysis that include BOD, TSS, E coli, O&G, Specific Conductance, Phosphorus, and Nitrogen. WET Testing is completed by BioAquatic located in Carrollton, TX.

The pH buffers have written opened-on date, and an expiration date calculated based on the earliest of 1-year from opened-on date, or the manufacturer's printed expiration date. However, pH buffer solutions begin to oxidize when opened and most do not last a full year – inspector was unable to verify the solutions' validity after opening from this manufacturer. Inspector recommends facility personnel contact the manufacturer to determine appropriate expiration time of solutions after they are opened or find a different manufacturer.

The permittee's current permit cycle now contains requirements for sampling for Per- and polyfluoroalkyl substances (PFAS) once per permit-term. Inspector will correspond with permittee outside of this inspection to ensure that permittee has the proper information about conducting the PFAS sampling and analysis.

Photo(s)

1. [IMG-20240506113018301862847.jpg](#)

Location: 2 - Primary and Secondary Treatment

Observation #: AA2-OB-004

Date: 05/06/2024

The original influent pipe was corrugated steel, but has been replaced with PVC, and an added a grit basin. There is no staff gauge for the influent flow meter.

The outer ring of aeration basins is not currently in use, but is available for extra storage, if needed. The aeration basin is currently watertight, but engineers have stated that catastrophic failure of aeration basin concrete walls is possible (horizontal cracks are visible in basin walls) due to freeze thaw damage and vibrations from blades.

The door to the blower room has a combination lock.

Denitrification was observed occurring in clarifier. Clarifier is leaning away from building; separation was observed in the concrete and the weirs aren't level. The clarifier is cleaned in March (once a year, although facility personnel say they try to clean it twice a year).

Smith Engineering has been retained for concrete and process engineering design.

Photo(s)

1. [IMG-202405061159215921102186.jpg](#)
2. [IMG-20240506120417417115740.jpg](#)
3. [IMG-20240506121919191959601.jpg](#)

Location: 3 - Disinfection to Discharge

Observation #: AA2-OB-005

Date: 05/06/2024

The effluent primary flow meter staff gauge is verified against the secondary ultrasonic meter one a month. The UV system has issues with the controller board not notifying operators of dead bulbs, so they use a 6-month schedule for replacing all the bulbs.

Location: 8 - Sludge and Biosolids

Observation #: AA2-OB-006

Date: 07/03/2024

The Imhoff sludge tanks have problems with the sludge plugs in the bottom, so someone must clean them out regularly. This is a permitted confined space. The tanks have a relatively low wall with respect to the ground, which could allow someone to trip and fall into the tank. These tanks need a barrier to be OSHA compliant. The wall above the drying beds is also low and needs a barricade to prevent fall hazards and the fence around the compost bin was observed to need repair. Facility personnel stated that there are not many pedestrians in the area, fences keep out the campers from the WWTP area.

Location: 4 - Laboratory

Observation #: AA2-OB-007

Date: 07/03/2024

Permittee has exceeded the DMR limit for specific conductance (300 uS/cm) for multiple years and is under an EPA Administrative Order (Docket number: CWA-06-2024-1743) to come into compliance. Permittee has elected to construct a new effluent reuse (total retention) engineered facility and then terminate the permit in accordance with the Administrative Order as described further below.

Location: 2 - Primary and Secondary Treatment

Observation #: AA2-OB-008

Date: 07/03/2024

Permittee has exceeded the DMR limit for specific conductance (300 uS/cm) for multiple years and is under Administrative Order number CWA-06-2024-1743 to come into compliance. Permittee has elected to come into compliance by constructing a new WWTP which will discharge to groundwater within the state of New Mexico under a state-specific groundwater permit. The Administrative Order deadlines are as follows: Obtain Design Drawings, Advertise for Bids and Award Construction by 10/31/2024; Obtain Permit(s) and complete Funding Application by 10/31/2025; Complete Rough Construction including Roads, Electrical, Headworks, and Effluent Field by 4/30/2027; Complete Moving Bed Biofilm Reactor (or equivalent) Unit Process Construction by 4/30/2028; New Facility Start-up, Completion, and terminate NPDES Permit by 1/1/2029. Permittee reports that they are on schedule and have contracted Wilson Engineering for the design of the new plant.

Location: 7 - Outfall 001 and Effluent

Observation #: AA2-OB-009

Date: 07/03/2024

Permittee has been reporting zeros ("0") for TSS concentrations and loadings from September 2022 to the date of this inspection report. It is highly unlikely that the plant has never discharged any measurable suspended solids during that time. Permittee must not tailor their sample collection dates/times to the schedule of the

plant but must collect the samples at times that will be representative of the actual quality of the effluent.

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: Other - Pollution Prevention Program		AOC: No
Ref #: AA2-RR-002	Reviewed By: Amy Andrews	Reviewed Date: 07/02/2024
This document fulfills part of the permit requirements in Part I:D. Document is labeled as "Spill Prevention, Control, and Countermeasure plan - 2024," however an SPCC plan is specific to preventing a discharge of petroleum products into navigable waters or adjoining shorelines, which does not apply to this facility.		
Document(s) 1. Spill Prevention, Control, and Countermeasure plan - 2024.docx		
Record: DMR Reports		AOC: Yes
Ref #: AA2-RR-001	Reviewed By: Amy Andrews	Reviewed Date: 07/02/2024
Since July 2021, the permittee has reported values of zero ("0") on their DMRs. Inspector-requested laboratory documents from January, February, and March 2024 showed the sample results as non-detect. Glorieta Camps NPDES Permit NM008088, Part II does allow certain pollutants to be reported as zero values if the method is sufficiently sensitive. TSS, BOD, and E coli cannot be reported as zero but must be reported as less than the laboratory's Reporting Limit. TSS, in this case, should have been reported as "<4.0" milligrams per liter. The loading rate and percent removals must then also be calculated using the laboratory's Reporting Limit. Therefore, the loading rates and percent removals for these months were reported incorrectly. Permittee's contract laboratory is frequently reporting "DO Depletion <2.0" which is a laboratory quality control error. While laboratory quality control errors do happen, they should not be happening nearly every month. Permittee should contact laboratory to discuss remedies of the error. Permittee is not using the flow on the date of sample for loading calculations. Loadings must be calculated for each day before they can be used to calculate the 7-day or 30-day averages. Permittee is calculating the 30-day average by dividing the total of the monthly concentrations by 30. Permittee is required to collect two monthly samples for BOD and TSS, therefore the 30-day average would be calculated by adding the two values together and dividing by the number of samples, which was two (2). Permittee is calculating the 7-day average by dividing the total of the monthly concentrations by seven (7). Permittee is required to collect two monthly samples for BOD and TSS. Assuming the two samples are collected at least a week apart from each other, the 7-day average would be the highest of the two sample result values. Please see Appendix 3 for a comparison of submitted values to values calculated by the inspector. Permittee must resubmit all incorrect values from this permit cycle (November 2023).		
Document(s) 1. WW DMR Form.xlsx		

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 #: AA2-OB-001	Location: 2 - Primary and Secondary Treatment
Regulation and/or Permit Requirement	
NM0028088 III.D.1.b	
III.D.1.b - REPORTING REQUIREMENTS; PLANNED CHANGES; INDUSTRIAL PERMITS The permittee shall give notice to the Director as soon as possible of any planned physical...	
AOC:	
EPA was not notified of the process change to reroute flow to the sludge tanks.	

AOC Reference #: AA2-OB-003	Location: 4 - Laboratory
Regulation and/or Permit Requirement	
NM0028088 III.C.5.a.	
III.C.5.a. - MONITORING AND RECORDS; MONITORING PROCEDURES a. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other...	
AOC:	
The thermometer in the lab is expired, tag says it was last calibrated 02/14/2017. Thermometers should be certified against a National Institute of Standards and Technology (NIST) calibrated thermometer at least once per year.	

AOC Reference #: AA2-OB-004	Location: 2 - Primary and Secondary Treatment
Regulation and/or Permit Requirement	
NM0028088 III.B.3.a	
III.B.3.a - PROPER OPERATION AND MAINTENANCE a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control...	
AOC:	
The aeration basin is currently watertight, but engineers have stated that catastrophic failure of aeration basin concrete walls is possible (horizontal cracks are visible in basin walls) due to freeze thaw damage and vibrations from blades.	

AOC Reference #: AA2-OB-004	Location: 2 - Primary and Secondary Treatment
Regulation and/or Permit Requirement NM0028088 III.B.3.a	
III.B.3.a - PROPER OPERATION AND MAINTENANCE a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control...	
AOC: Denitrification is occurring in clarifier. Clarifier is leaning away from building, can see separation in concrete and weirs aren't level. The clarifier is cleaned in March (once a year, although facility personnel say they try to clean it twice a year).	

AOC Reference #: AA2-OB-006	Location: 8 - Sludge and Biosolids
Regulation and/or Permit Requirement NM0028088 III.B.3.a	
III.B.3.a - PROPER OPERATION AND MAINTENANCE a. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control...	
AOC: The tanks have a relatively low wall with respect to the ground, which could allow someone to trip and fall into the tank. These tanks need a barrier to be OSHA compliant. The wall above the drying beds is also low and needs a barricade to prevent fall hazards and the fence around compost bin isn't in great shape.	

AOC Reference #: AA2-RR-001	Records Review: DMR Reports
Regulation and/or Permit Requirement NM0028088 I.A.1.	
I.A.1. - Limitations and Monitoring Requirements. OUTFALL 001 - FINAL Effluent Limits – 0.4 MGD Design Flow During the period beginning the effective date of the...	
AOC: Since July 2021, the permittee has reported values of zero ("0") on their DMRs. Inspector-requested laboratory documents from January, February, and March 2024 showed the sample results as non-detect. NPDES Permit NM008088, Part II does allow certain pollutants to be reported as zero values if the method is sufficiently sensitive, however, TSS, BOD, and E coli cannot be reported as zero, they must be reported as less than the laboratory's Reporting Limit. TSS, in this case, should have been reported as "<4.0" milligrams per liter. The loading rate and percent removals must then also be calculated using the laboratory's Reporting Limit. Therefore, the loading rates and percent removals for these months were reported incorrectly. Permittee is not using the flow on the date of sample for loading calculations. Loadings must be calculated for each day before they can be used to calculate the 7-day or 30-day averages.	

AOC Reference #: AA2-RR-001	Records Review: DMR Reports
Regulation and/or Permit Requirement NM0028088 III.F.22.b	
III.F.22.b - DEFINITIONS; MUNICIPAL TERMS; 30-DAY AVERAGE or MONTHLY AVERAGE, other than for fecal coliform bacteria, is the arithmetic mean of the daily values for...	
AOC: Permittee is calculating the 30-day average by dividing the total of the monthly concentrations by 30. Permittee is required to collect two monthly samples for BOD and TSS, therefore the 30-day average would be calculated by adding the two values together and dividing by the number of samples, which was two (2).	

AOC Reference #: AA2-RR-001	Records Review: DMR Reports
Regulation and/or Permit Requirement NM0028088 III.F.22.a	
III.F.22.a - DEFINITIONS; MUNICIPAL TERMS; 7-DAY AVERAGE or WEEKLY AVERAGE, other than for fecal coliform bacteria, is the arithmetic mean of the daily values for all...	
AOC: Permittee is calculating the 7-day average by dividing the total of the monthly concentrations by seven (7). Permittee is required to collect two monthly samples for BOD and TSS. Assuming the two samples are collected at least a week apart from each other, the 7-day average would be the highest of the two sample result values.	

AOC Reference #: AA2-OB-009	Location: 7 - Outfall 001 and Effluent
Regulation and/or Permit Requirement NM0028088 III.C.2	
III.C.2 - MONITORING AND RECORDS; REPRESENTATIVE SAMPLING Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity....	
AOC: Permittee has been reporting zeros ("0") for TSS concentrations and loadings from September 2022 to the date of this inspection report. It is highly unlikely that the plant has never discharged any measurable suspended solids during that time. Permittee must not tailor their sample collection dates/times to the schedule of the plant but must collect the samples at times that will be representative of the actual quality of the effluent.	

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA REGION 6 Lead Inspector held a closing conference with Facility personnel at 12:58 PM (MT) on 05/06/2024 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

The following items may need additional follow-up.

Location:	Area:	Sub-area:
AA2-RR-001		
Permittee must resubmit all incorrect values from this permit cycle (November 2023).		
Permittee should contact laboratory to discuss remedies of the error.		
Location: 0 - Collection System	Area:	Sub-area:
AA2-OB-002		
Inspector requested a copy of the agreement with Village of Glorieta (completed)		
Location: 4 - Laboratory	Area:	Sub-area:
AA2-OB-003		
Inspector recommends facility personnel contact the manufacturer to determine appropriate expiration time of solutions after they are opened or find a different manufacturer.		
The permittee's current permit cycle now contains requirements for sampling for Per- and polyfluoroalkyl substances (PFAS) once per permit-term. Inspector will correspond with permittee outside of this inspection to ensure that permittee has the proper information about conducting the PFAS sampling and analysis.		

Communication Log

The following information was received by EPA REGION 6 on/after exiting the Facility on 05/06/2024.

Type	Point of Contact	Job Title/Organization	Description	Date
Email	Steven Rasmussen	Wastewater Operator/Glorieta Camps	Four emails received on 5/17/24 containing all requested documentation.	05/17/2024 11:33 AM (MT) 05/17/2024 11:35 AM (MT) 05/17/2024 11:36 AM (MT) 05/17/2024 11:37 AM (MT)

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log
3. DMR Comparison – Submitted Values to Inspector-Calculated Values

APPENDIX 1: PHOTO LOG



[Title]			IMG-20240506113018301862847.jpg
05/06/2024 11:30 AM (MT)	No CBI	No PII	Photographer: Amy Andrews
4 - Laboratory			[Geographic Coordinates]
pH buffer solutions showing opened-on date and expiration date calculated from the earliest of 1-year from opening, or manufacturer's printed expiration date.			



[Title]			IMG-202405061159215921102186.jpg
05/06/2024 11:59 AM (MT)	No CBI	No PII	Photographer: Amy Andrews
2 - Primary and Secondary Treatment			[Geographic Coordinates]
[Description]			



[Title]			IMG-20240506120417417115740.jpg
05/06/2024 12:04 PM (MT)	No CBI	No PII	Photographer: Amy Andrews
2 - Primary and Secondary Treatment			[Geographic Coordinates]
Sludge tanks and drying bed wall present falling safety hazard.			



[Title]			IMG-20240506121919191959601.jpg
05/06/2024 12:19 PM (MT)	No CBI	No PII	Photographer: Amy Andrews
2 - Primary and Secondary Treatment			[Geographic Coordinates]
Crack between building and settling clarifier has been sealed with expanding spray foam.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
DMR Reports	WW DMR Form.xlsx	No	No	Amy Andrews	07/02/2024
Other - Pollution Prevention Program	Spill Prevention, Control, and Countermeasure plan - 2024.docx	No	No	Amy Andrews	07/02/2024

APPENDIX 3: DMR Comparison – Submitted Values to Inspector-Calculated Values

Glorieta Camps WWTP
NPDES Permit NM0028088

DMR Comparison to Laboratory Reports

Effluent BOD₅ Concentrations:

DMR Date	From Lab ¹			Proper Value for DMR Calcs	Reported on DMRs ²		DMR Values Calculated ³	
	Sample Date	Lab Value (mg/L)	Reporting Limit		30-DAY AVG (mg/L)	7-DAY AVG (mg/L)	30-DAY AVG (mg/L)	7-DAY AVG (mg/L)
January 2024	1/3/2024	DO Depletion <2.0	2.00	2.00	0.13	0.57	2.0	2.0
January 2024	1/16/2024	DO Depletion <2.0	2.00	2.00				
February 2024	2/6/2024	ND	2.00	2.00	0.07	0.29	2.0	2.0
February 2024	2/19/2024	DO Depletion <2.0	2.00	2.00				
March 2024	3/5/2024	DO Depletion <2.0	1.3	1.3	0.15	0.66	2.0	2.6
March 2024	3/13/2024	2.6	1.0	2.6				
Permit Limits:		N/A			30	45	30	45

Effluent BOD₅ Loadings:

Permittee ⁴	Reported on DMRs ²		DMR Values Calculated ³	
	Flow (MGD)	30-DAY AVG (lbs/day)	7-DAY AVG (lbs/day)	30-DAY AVG (lbs/day)
0.00947	0.01	0.04	0.16	0.16
0.009347				
0.009953	0.005	0.02	0.17	0.17
0.009699				
0.012713	0.016	0.07	0.21	0.28
0.024216				
	100	150	100	150

BOD₅ Percent Removal:

From Lab ¹	Reported ²	Calculated ³
Influent (mg/L)	% Removed	% Removed
92.7	98.68%	98.68%
210		
163	99.34%	98.69%
142		
170	99.32%	99.43%
510		
	≥85%	≥85%

Effluent TSS Concentrations:

DMR Date	From Lab ¹			Proper Value for DMR Calcs	Reported on DMRs ²		DMR Values Calculated ³	
	Sample Date	Lab Value (mg/L)	Reporting Limit		30-DAY AVG (mg/L)	7-DAY AVG (mg/L)	30-DAY AVG (mg/L)	7-DAY AVG (mg/L)
January 2024	1/3/2024	ND	4.0	4.0	0	0	<4.0	<4.0
January 2024	1/16/2024	ND	4.0	4.0				
February 2024	2/6/2024	ND	4.0	4.0	0	0	<4.0	<4.0
February 2024	2/19/2024	ND	4.0	4.0				
March 2024	3/5/2024	ND	4.0	4.0	0	0	<4.0	<4.0
March 2024	3/13/2024	ND	4.0	4.0				
Permit Limits:					30	45	30	45

Effluent TSS Loadings:

Permittee ⁴	Reported on DMRs ²		DMR Values Calculated ³	
	Flow (MGD)	30-DAY AVG (lbs/day)	7-DAY AVG (lbs/day)	30-DAY AVG (lbs/day)
0.00947	0	0	0.32	0.32
0.009347				
0.009953	0	0	0.33	0.33
0.009699				
0.012713	0	0	0.42	0.42
0.024216				
	100	150	100	150

TSS Percent Removal:

From Lab ¹	Reported ²	Calculated ³
Influent Grab Sample	% Removed	% Removed
24	100.00%	91.92%
75		
82	100.00%	92.86%
30		
65	100.00%	95.43%
110		
	≥85%	≥85%

E. coli Bacteria Concentrations:

DMR Date	From Lab ¹			Proper Value for DMR Calcs	Reported on DMRs ²		DMR Values Calculated ³	
	Sample Date	Lab Value (MPN/100)	Reporting Limit		30-DAY GeoMean (CFU/100mL)	Daily Max (cfu/100mL)	30-DAY GeoMean (CFU/100mL)	Daily Max (cfu/100mL)
January 2024	1/3/2024	<1	1.000	1.000	0.033	1	1	1.000
January 2024	1/16/2024	<1	1.000	1.000				
February 2024	2/6/2024	<1	1.000	1.000	0.033	1	1	1.000
February 2024	2/19/2024	<1	1.000	1.000				
March 2024	3/5/2024	ND	1.00	1.00	0.033	1	1	1.0
March 2024	3/13/2024	1	1.0	1.0				
Permit Limits:					126	235	126	235

Notes:

- 1 - Values listed on laboratory reports provided to inspector by permittee.
 - 2 - Values reported by permittee on DMRs and obtained by inspector via ICIS database.
 - 3 - DMR values calculated by inspector directly from laboratory report values.
 - 4 - Values provided to inspector by permittee.
- RED** Values were incorrectly reported on DMRs