

INSPECTION REPORT

Inspection Entry Date/Time	09/12/2023 09:30 AM (MT)	Announced: No
Inspection Exit Date/Time	09/12/2023 04:00 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	Las Vegas (City Of)	
Facility or Site Name	Las Vegas (City Of)	
Facility/Site Physical Address	3390 Hot Springs Boulevard	
City, State, Zip Code	Las Vegas, NM 87701	
County/Borough/Parish		
Facility GPS Coordinates	35.652015, -105.275872	
Mailing Address (If different)		
City, State, Zip Code		
FRS ID	110011026941	
Permit Number(s) (If Applicable)	NM0028827	
SIC and/or NAICS	4952 4941	
Regulatory Representatives Participating in Inspection:		
Title	Name	Organization
NMED Manager / Inspector	Jason Martinez	NMED
Lead Inspector:		
Kenneth Aubuchon	KENNETH AUBUCHON Digitally signed by KENNETH AUBUCHON Date: 2023.12.21 16:46:35 -06'00'	
	EPA REGION 6	aubuchon.kenneth@epa.gov (281) 983-2151
Supervisor Review:		
Roberto Bernier	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2023.12.21 17:12:51 -06'00'	
	EPA REGION 6	roberto.bernier@epa.gov (214) 665-8376

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

EPA REGION 6 Lead Inspector, Kenneth Aubuchon, arrived at the Las Vegas (City Of) (the “Site” or “Facility”), located at 3390 Hot Springs Boulevard, Las Vegas, NM 87701, at 09:30 AM (MT) on 09/12/2023 for an unannounced inspection. EPA REGION 6 Lead Inspector presented credentials to Maria Gilvarry 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 Las Vegas (City Of) 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 Facility 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 Facility 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

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA REGION 6	Kenneth Aubuchon	Lead Inspector	Yes	Yes
City of Las Vegas	Maria Gilvarry	Utilities Director	Yes	Yes
City of Las Vegas	Jacalyn Stomberg	Wastewater Associate	Yes	Yes
NMED	Jason Martinez	NMED Manager / Inspector	Yes	Yes
City of Las Vegas	Adrian Jaramillo	Safety Officer / DER / HR	Yes	Yes
City of Las Vegas	James Lopez	Wastewater OIT	Yes	Yes
City of Las Vegas	Joshua McClanahan	Collections Tech-1	Yes	Yes

Facility/Site Description

EPA REGION 6 lead inspector confirmed the following facility information:

Raw wastewater enters the plant via a 12-inch Parshall flume with a pulsar electro sonic totalizer, then passes through an automated bar screen and a grit removal system. The solids are sent to the grit classifier, where the influent is sent through the plant, while the heavy organic material and grit is washed and deposited in a dumpster for final disposal at a landfill. The last unit in the headworks is a grease removal unit.

The facility was upgraded in 2018 when the two primary clarifiers and old racetrack aeration basin were repurposed for emergency overflow capacity. From the headworks, wastewater travels to the east and west aeration basins for treatment. The 22 feet deep aeration (AB) basins have an aerobic zone, an intermediate zone, and an anoxic zone. The facility has three blowers to provide air to the system. The blowers are not variable speed blowers and are oversized, so it is not possible to maintain the dissolved oxygen at a steady state throughout the night when the facility is unstaffed. Decant flows by gravity to the two secondary clarifiers. Following the clarifiers is an inline micro filtration system. Effluent passes through the ultraviolet disinfection

system and flows through the 2' Cipolletti weir and secondary totalizer to the outfall located on the bank of the Gallinas River. The permittee collects its effluent samples just above the weir. Reuse water is diverted before the weir and chlorinated before storage on-site.

Waste Activated Sludge (WAS) is pulled from the aeration basins and sent to the aerobic digesters. Final disposal is at surface application sites owned by the city.

Facility/Site Information

Location(s)

Location/Area/Sub-area	Description
Outfall 001	Outfall 001 is located at Latitude 35 - 33' 59.68" north and Longitude 105 - 12' 42.37" west. The effluent from the treatment plant is discharged into the Gallinas River (Perennial prt Aguilar Creek to Pecos Arroyo) in Segment No. 20.6.4.220 of the Pecos River Basin.
Solids	Waste Activated Sludge (WAS) is pulled from the aeration basins and sent to the aerobic digesters. Final disposal is at a surface application sites owned by the city.
Sludge Removal	At the time of the inspection, the solids digester was unable to transfer waste solids to be hauled to facility land application sites due to a broken valve in the closed position. Sludge removal is limited to the onsite drying beds.
Treatment System	The aeration (AB) basins have an aerobic zone, an intermediate zone, and an anoxic zone. The facility has three blowers to provide air to the system. Decant flows by gravity to the two secondary clarifiers. Following the clarifiers is an inline micro filtration system. Effluent passes through the ultraviolet disinfection system.
Grit Removal	At the time of the inspection, the grit removal system was not in operation.
Secondary Clarifier	At the time of the inspection, one of the secondary clarifiers was not operational due to a bent rack arm and the need for a motor replacement.

SECTION II – OBSERVATIONS

Location: Outfall 001		
Observation #:	Date:	Weather:
KA1-OB-001	09/12/2023	
On May 7, 2018, the facility was issued an administrative order (AO) for NPDES permit violations for Total Aluminum violations and not submitting discharge monitoring reports (DMRs). There was a total of twelve reported effluent limit violations, all for Total Aluminum, in DMRs submitted on 1/15/2022, 10/15/2021, 9/15/2020, 2/15/2020, 11/15/2019, 5/15/2019, 1/15/2019, 8/15/2018, 1/15/2018, 11/15/2017, 10/15/2017, and 9/15/2017. Administrative Order; Docket Number: CWA-06-2016-1730 required the facility to take such measures as are necessary to comply with the Permit conditions, specifically for the Total Aluminum effluent limitations, no later than thirty (30) days from the effective date of the Order.		

Location: Solids		
Observation #: KA1-OB-002	Date: 09/12/2023	Weather:
At the time of the inspection, the solids digester was unable to transfer waste solids to be hauled to facility land application sites due to a broken valve in the closed position. Sludge removal is limited to the onsite drying beds and the staff using a pump installed over the gravity thickener wall and are pumping directly from the digesters.		

Location: Treatment System		
Observation #: KA1-OB-003	Date: 09/12/2023	Weather:
At the time of the inspection, one of the secondary clarifiers was not operational due to a bent rack arm and the need for a motor replacement. Purchase order number 240451 for the repairs was provided.		

Location: Treatment System/Grit Removal		
Observation #: KA1-OB-004	Date: 09/12/2023	Weather:
At the time of the inspection, the grit removal system was not in operation. Purchase orders 231306 and 240537 were provided indicating belt and pulley on grit blower and grit pump work has been initiated.		

Location: Outfall 001		
Observation #: KA1-OB-005	Date: 09/12/2023	Weather:
On July 18, 2023, the facility was issued an administrative order (AO) for NPDES permit violations for failure to meet permit effluent limitations. A response letter sent on August 10, 2023, identified a gravity thickener valve at the Wastewater Treatment Plant (WWTP) broken in the closed position on December 9, 2022, resulting in staff being unable to discharge sludge for the exceedances. Further explained was that to address the exceedances the valve will need to be replaced or an alternative found to allow for proper levels of sludge removal. The city reached out to contractors from New Mexico and Texas to obtain cost estimates for the repair. The contractors City staff contacted would not perform the work due to the depth and the location of the valve relative to the digester wall. City staff and engineer are developing a permanent solution. The E Coli issues have been addressed by maintenance performed on the UV system. At the time of the inspection, additional reported violations were identified in discharge monitoring reports submitted to the Environmental Protection Agency, Region 6 (EPA) after the issuance of the AO. The City's wastewater treatment facility reported violations were for total aluminum, total residual chlorine, and ammonia exceedances of permitted effluent limitations.		

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: Sludge Sampling Report		AOC: Yes
Ref #: KA1-RR-007	Reviewed By: Kenneth Aubuchon	Reviewed Date: 12/13/2023
Email From: Draper, Seth To: Aubuchon, Kenneth Subject: RE: Sludge Reports for NM0028827 City of Las Vegas NM Date: Wednesday, December 13, 2023 3:15:54 PM I have sludge submission records from Las Vegas for 2021 and 2020. There are older 2018 and 2017 reports. They did not submit anything for disposal activities in calendar year 2022.		
Document(s) 1. RE_ Sludge Reports for NM0028827 City of Las Vegas NM.pdf		
Record: Compliance Monitoring & Enforcement Report		AOC: Yes
Ref #: KA1-RR-006	Reviewed By: Kenneth Aubuchon	Reviewed Date: 09/12/2023
Administrative Order; Docket Number: CWA-06-2023-1776 dated July 18, 2023. Violations were identified during a review of your permit file and discharge monitoring reports submitted to the Environmental Protection Agency, Region 6 (EPA) for the City's wastewater treatment facility. The violations alleged are for exceedances of permitted effluent limitations.		
Document(s) 1. 6ENWM Administrative Order and Attachments City Of Las Vegas NM0028827 (003).pdf		
Record: Compliance Monitoring & Enforcement Report		AOC: No
Ref #: KA1-RR-005	Reviewed By: Kenneth Aubuchon	Reviewed Date: 09/12/2023
August 10, 2023, Response letter to Administrative Order - Docket Number: CW A-06-2023-1776/NM0028827		
Document(s) 1. WWTP AO response CWA-06-2023-1776NM0028827.pdf		
Record: Inspection Report – Previous		AOC: No
Ref #: KA1-RR-004	Reviewed By: Kenneth Aubuchon	Reviewed Date: 09/12/2023
City of Las Vegas Wastewater Treatment Facility; Major; Municipal Individual Permit; SIC 4952; Compliance Evaluation Inspection; NPDES Permit NM0028827; November 3, 2016		
Document(s) 1. NM0028827-20161103 inspection report.pdf		

Record: Excursion Reports		AOC: No
Ref #: KA1-RR-003	Reviewed By: Kenneth Aubuchon	Reviewed Date: 09/12/2023
E90 Effluent Violations From 01/01/2019 - 9/2023		
Document(s)		
1. E90 Effluent Violations with Limit Set Designator and Number of Excursions.pdf		
Record: Permit Fact Sheet		AOC: No
Ref #: KA1-RR-002	Reviewed By: Kenneth Aubuchon	Reviewed Date: 09/12/2023
NPDES PERMIT NO. NM0028827 / FACT SHEET / City of Las Vegas WWTP		
Document(s)		
1. 2021_Las Vegas WWTP Fact Sheet_NM0028827_Final.pdf		
Record: Enforcement Order Milestones and Consent Decree Commitments		AOC: No
Ref #: KA1-RR-001	Reviewed By: Kenneth Aubuchon	Reviewed Date: 09/12/2023
Administrative Order; Docket Number: CWA-06-2016-1730 dated January 22, 2016. Violations were identified during a review of your permit file and discharge monitoring reports submitted to the Environmental Protection Agency, Region 6 (EPA) for the City's wastewater treatment facility. The violations are for total aluminum exceedances of permitted effluent limitations.		
Document(s)		
1. 6ENW.CityofLasVegas.01.22.16.pdf		

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: Outfall 001
Regulation and/or Permit Requirement	
Administrative Order; Docket Number: CWA-06-2023-1776 dated July 18, 2023	
...required the facility to take such measures as are necessary to comply with the Permit conditions, no later than thirty (30) days from the effective date of the Order.	
AOC:	
At the time of the inspection, additional reported violations were identified in discharge monitoring reports submitted to the Environmental Protection Agency, Region 6 (EPA) after the issuance of the AO. The City's wastewater treatment facility reported violations were for total aluminum, total residual chlorine, and ammonia exceedances of permitted effluent limitations.	
Additional Notes:	

AOC Reference #: KA1-RR-006	Treatment System
Regulation and/or Permit Requirement 40 CFR 122.41(e)	
122.41(e) - (e) Proper operation and maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control...	
AOC: 1) At the time of the inspection, one of the secondary clarifiers was not operational due to a bent rack arm and the need for a motor replacement. Purchase order number 240451 for the repairs was provided. 2) At the time of the inspection, the grit removal system was not in operation. Purchase orders 231306 and 240537 were provided indicating belt and pulley on grit blower and grit pump work has been initiated. 3) At the time of the inspection, the solids digester was unable to transfer waste solids to be hauled to facility land application sites due to a broken valve in the closed position. Sludge removal is limited to the onsite drying beds and the staff using a pump installed over the gravity thickener wall and are pumping directly from the digesters.	
Additional Notes: Purchase orders were provided of repairs and parts to bring plant into proper operations.	

AOC Reference #: KA1-RR-007	Records Review: Sludge Sampling Report
Regulation and/or Permit Requirement NPDES Permit NM0028827 Part IV: MAJOR - SEWAGE SLUDGE REQUIREMENTS	
The sludge DMRs shall be due by February 19th of each year and shall cover the previous January through December time period.	
AOC: At the time of this report, no records/submissions for biosolid disposal activities in calendar years 2022 or 2019 were provided or identified. Biosolid submissions from Las Vegas for years 2021, 2020, 2018, and 2017 were identified in EPA Region 7's data base.	
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 04:00 PM (MT) on 09/12/2023 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

No follow up was required after exiting the facility on 09/12/2023.

Communication Log

The following information was received by EPA REGION 6 on/after exiting the Facility on 09/12/2023.

Type	Location	Point of Contact	Job Title/Organization	Description	Contains PII	Date
Email		Maria Gilvarry	Utilities Director/City of Las Vegas, NM	Net DMR backup for July 2023	No	09/18/2023 09:08 AM (CT)
Email		Maria Gilvarry	Utilities Director/City of Las Vegas, NM	Purchase Order documents requested in support of the 9/12 inspection at CLV	No	09/25/2023 05:55 PM (CT)
Email		Maria Gilvarry	Utilities Director/City of Las Vegas, NM	Purchase Order documents requested in support of the 9/12 inspection at CLV	No	09/21/2023 07:37 AM (CT)
Email		Maria Gilvarry	Utilities Director/City of Las Vegas, NM	Purchase Order documents requested in support of the 9/12 inspection at CLV	No	09/18/2023 09:24 AM (CT)

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log

APPENDIX 1: PHOTO LOG



Sludge Site Plan			P1010019.JPG
09/12/2023	No CBI	No PII	Kenneth AuBuchon
Sludge Site Plan used for the application of biosolids for beneficial reuse.			



Headworks Bar Screen			P1010020.JPG
09/12/2023	No CBI	No PII	Kenneth AuBuchon
Headworks Bar Screening operations.			



Clarifier			P1010026.JPG
09/12/2023	No CBI	No PII	Kenneth AuBuchon
Operating clarifier			



Clarifier			P1010023.JPG
09/12/2023	No CBI	No PII	Kenneth AuBuchon
Old clarifier used for equalization.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Enforcement Order Milestones and Consent Decree Commitments	6ENW.CityofLasVegas.01.22.16.pdf	No	No	Kenneth Aubuchon	12/13/2023
Permit Fact Sheet	2021_Las Vegas WWTP_Fact Sheet_NM0028827_Final.pdf	No	No	Kenneth Aubuchon	12/13/2023
Excursion Reports	E90 Effluent Violations With Limit Set Designator and Number of Excursions.pdf	No	No	Kenneth Aubuchon	12/13/2023
Inspection Report – Previous	NM0028827-20161103 inspection report.pdf	No	No	Kenneth Aubuchon	12/13/2023
Other - Purchase Order	240722-ww.pdf	No	No	Kenneth Aubuchon	12/13/2023
Compliance Monitoring & Enforcement Report	WWTP AO response CWA-06-2023-1776NM0028827.pdf	No	No	Kenneth Aubuchon	12/20/2023
Compliance Monitoring & Enforcement Report	6ENWM Administrative Order and Attachments City Of Las Vegas NM0028827 (003).pdf	No	No	Kenneth Aubuchon	12/20/2023
Sludge Sampling Report	RE_ Sludge Reports for NM0028827 City of Las Vegas NM.pdf	No	No	Kenneth Aubuchon	12/20/2023