

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	01/19/2022	
Media Program:	Water	
Regulatory Program(s)	CWA	
Company Name:	Town of Red River	
Facility Name:	Red River WWTP	
Facility Physical Location:	2 Straight Creek Trail	
(city, state, zip code)	Red River, New Mexico 87558	
Mailing address:	Post Office Box 1020	
(city, state, zip code)	Red River, New Mexico 87558	
County/Parish:	Taos	
Facility Phone Number	575-754-6671	
Facility Contact:	Patrick Jaramillo	Plant Manager
	awwtplant@gmail.com	
FRS Number:	110002042110	
Identification/Permit Number:	NM0024899	
Media Identifier Number:	NA	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Patrick Jaramillo	Town of Red River	Plant Manager
Miguel De La Mata	Town of Red River	Laboratory Analyst
Matthew Stewart	Town of Red River	Wastewater 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 Town of Red River (Red River) Wastewater Treatment Plant (WWTP) approximately 10:00 AM on January 19, 2022, for an unannounced inspection. I presented my credentials to Mr. Patrick Jaramillo, Plant Manager 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 Red River representatives, observations made by the EPA inspector, NMED, and records and reports maintained by the permittee (Red River), and the EPA. Before leaving the facility on January 19, 2022, an exit briefing was held with Mr. Jaramillo, to explain areas of concern noted at the time of the inspection. It should be noted the WWTP also maintains a discharge permit (DP-268) issued by the New Mexico Environment Department (NMED), Groundwater Quality Bureau (GWQB) in conjunction with the sludge drying beds

FACILITY DESCRIPTION

The WWTP was constructed in 1983 and 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 2 Straight Creek Trail, Red River, Taos County, New Mexico (depicted in **Aerial Image #1** below). The WWTP is operated by staff within the Public Works Department and consists of 7 full-time equivalent (FTE) positions, during the hours of 7:00 AM to 3:30 PM daily. On-call staff is available on an as needed basis.

The 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 (**Appendix 2 Piping Flow Diagram**), two (2) lift station (identified in **Table #1** and depicted in **Appendix 3**), headworks comprised of a bar screen/grit removal system (**Appendix 1 Photograph #1**, and **Photograph #2**), grit cyclone, screened fine mesh filter (**Appendix 1 Photograph #3**, and **Photograph #4**), three (3) trains of Rotating Biological Contactors (RBCs): one (1) for biological oxygen demand (BOD) removal and two (2) for ammonia removal (**Appendix 1 Photograph #5** and **Photograph #6**), two (2) parallel final clarifiers, three (3) parallel ultraviolet (UV) disinfection banks (**Appendix 1 Photograph #7**), thence the disinfected effluent traverses over a stepped cascade structure prior to discharge to the Red River via a closed conduit pipe (**Appendix 1 Photograph #8** and **Appendix 4 Red River WWTP Hydraulic Profile**).

Solids are wasted from the clarifiers and pumped to the seven (7) lined drying beds located east of the WWTP main building. The sludge enters the drying beds via a forced main from the WWTP. Decant water

is returned to the headworks by gravity flow lines. Following the approximate 3-year sludge detention time, solids are moved to a stockpile area near the WWTP and are blended with wood chips for compost.



Aerial Image #1: Overall view of the Town of Red River’s Wastewater Treatment Plant. Aerial from Google Earth maps.

Table 1: Town of Red River Lift Stations

	Lift Station	Address
1	High Street	461 East High Street
2	Rio Colorado	approximately at the end of Golden Treasure Trail

Septage and domestic (typically greywater) wastewater is screened before entering the headworks. According to WWTP records approximately two (2) septic dumps per week, averaging 1200 gallons each time is received.

Currently, there is no Industrial User (IU) contributing to the WWTP.

Section II – OBSERVATIONS

I observed the following and/or the following information was provided or stated on January 19, 2022.

- It was stated Red River does not have existing written policies and procedures to address any potential sanitary sewer overflow events (SSOs), standard operating procedures (SOPs) pertaining facility operations and maintenance (O&M) and/or a Fats, Oils and Grease (FOG) program.
- The WWTP does not have back-up for some of its aging treatment process equipment (**Appendix 1 Photograph #3, and Photograph #4**), i.e., if equipment or mechanical systems go off-line replacement parts are difficult to locate and often require specific manufacture reproduction.
- The WWTP maintains an on-site generator for back up that is exercised every two (2) weeks.
- An alarm system comprised of a series of monitors and a call out system notifies the operators by telephone of any WWTP process failures.
- I was advised that in approximately mid-January 2021 electricity was lost to the compressors in the sludge pump room. These compressors are used to assist the four (4) sludge pumps that pump the sludge to the lagoons from the clarifiers. It was ultimately identified the sludge line force main to the lagoons was frozen.
- It was stated the sludge has been staged on-site for at least the last 8-years.
- Overall maintenance and operation of the WWTF appeared to be satisfactory. All equipment looked to be running properly.
- An Administrative Order (AO) (Docket #CWA-06-2018-1781) was issued on April 5, 2018, regarding a bulk caustic soda spill on January 5, 2018.
- A First Amended Administrative Complaint (Complaint) (Docket #CWA-06-2018-1786) was issued on July 10, 2018.
- A Consent Agreement and Final Order (CAFO) (Docket #CWA-06-2018-1786) was issued on December 4, 2019, regarding the January 2018 bulk caustic soda spill and included provisions to Supplemental Environmental Project (SEP) parameters.
- The current NPDES permit (NM0024899) is set to expire on April 30, 2022. A permit/application renewal has not been submitted. Note: The typical process suggests submittal 180-days prior to expiration.

Section III– RECOMMENDATIONS

- Preparation and implementation of written policies and procedures to address any potential sanitary sewer overflow events (SSOs), standard operating procedures (SOPs) pertaining facility operations and maintenance (O&M) and/or a Fats, Oils and Grease (FOG) program.

Section IV – AREAS OF CONCERN

A review of the Integrated Compliance Information System (ICIS) database for the period from January 5, 2018, to January 19, 2022, indicates the following:

1. NPDES permit excursion- Suspended Solids (percent removal)- April 2019, January 2021, and June 2021
2. NPDES permit excursion- pH Gross Effluent- January 2018, February 2018, and June 2021
3. NPDES permit excursion- Biological Oxygen Demand-5 day (BOD₅)- January 2019, February 2019, March 2019, April 2019, January 2021, February 2021
4. NPDES permit excursion- Phosphorus Total [as P]- June 2021
5. NPDES permit excursion- Nitrogen Total [as N]- June 2021
6. NPDES permit excursion- Chlorine Total residual- June 2021
7. Non-receipt of Discharge Monitoring Reports (DMR)- June 2021
8. NPDES permit excursion- Escherichia coli (E coli)- November 2018, March 2019, May 2019, June 2019, and June 2021

Additional Areas of Concern

9. It was stated the sludge has been staged on-site for at least the last 8-years.
10. The current NPDES permit (NM0024899) is set to expire on April 30, 2022. A permit/application renewal has not been submitted. Note: The typical process suggests submittal 180-days prior to expiration.

EPA Region 6 inspector David Esparza conducted a closing conference at Town of Red River's WWTP approximately at 3:30 PM on January 19, 2022, for the inspection.

Section IV – FOLLOW UP

The following information was received by EPA on January 28, 2022, after exiting the Facility on January 18, 2022:

- A summary of the quantity and locations of Red River's lift station(s), inclusive of an aerial image overlay.
- An aerial image overlay of the WWTP of the gravity collection/discharge system Piping Flow Diagram.
- A copy of the current WWTP hydraulic profile schematic.
- A summary of the approximate quantity of septage volumes.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 8 photos taken 1/19/2022

Appendix 2 – Piping Flow Diagram

Appendix 3 – Aerial Image of The Lift Station Locations

Appendix 4 – Red River WWTP Hydraulic Profile

Appendix 5 – A Review of the Integrated Compliance Information System (ICIS) Database for the period from January 5, 2018, to January 18, 2022

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Red River Wastewater Treatment Plant		
City: Red River	County/Parish: Taos	State: New Mexico



View of the headworks comprised of a bar screen/grit removal system. (DSCN2098). Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Red River Wastewater Treatment Plant		
City: Red River	County/Parish: Taos	State: New Mexico



Another view of the headworks comprised of a bar screen/grit removal system. (DSCN2099).
Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Red River Wastewater Treatment Plant		
City: Red River	County/Parish: Taos	State: New Mexico



View of the screened fine mesh filter. (DSCN2097). Note: one (1) mesh filter is currently off-line awaiting repair and/or maintenance. Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Red River Wastewater Treatment Plant		
City: Red River	County/Parish: Taos	State: New Mexico



Another view of the screened fine mesh filter. (DSCN2100). Note: one (1) mesh filter is currently off-line awaiting repair and/or maintenance. Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Red River Wastewater Treatment Plant		
City: Red River	County/Parish: Taos	State: New Mexico



View of the three (3) trains of Rotating Biological Contactors (RBCs): one (1) for biological oxygen demand (BOD) removal and two (2) for ammonia removal. (DSCN 2102). Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Red River Wastewater Treatment Plant		
City: Red River	County/Parish: Taos	State: New Mexico



Another view of the Rotating Biological Contactors (RBCs): one (1) for biological oxygen demand (BOD) removal and two (2) for ammonia removal. (DSCN 2105). Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Red River Wastewater Treatment Plant		
City: Red River	County/Parish: Taos	State: New Mexico



View of the three (3) parallel ultraviolet (UV) disinfection banks. (DSCN 2107) Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Red River Wastewater Treatment Plant		
City: Red River	County/Parish: Taos	State: New Mexico



View of the disinfected effluent as it traverses over a stepped cascade structure prior to discharge to the Red River via a closed conduit pipe. (DSCN 2106) Photographed by D. Esparza

Appendix 2

Piping Flow Diagram



© 2015 Google

Google earth

Appendix 3

Aerial Image of The Lift Station Locations

Town of Red River Lift Stations



WorldMark Red River

Main St

High Street LS

Rio Colorado Cabins

Rio Colorado LS

Google Earth

800 ft



Appendix 4

Red River WWTP Hydraulic Profile

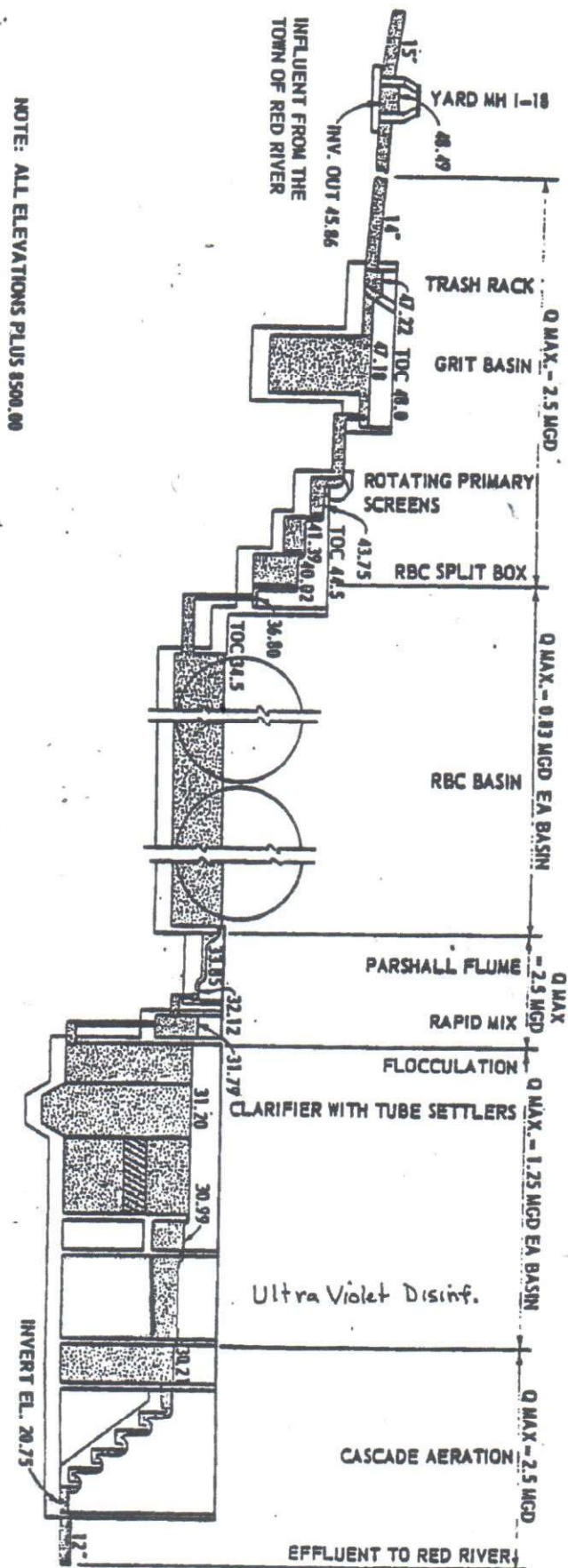


Figure I-1. HYDRAULIC PROFILE

Appendix 5

A Review of the Integrated Compliance Information
System (ICIS) Database
for
the period from
January 5, 2018, to January 18, 2022

FE&C

NPDES

AIR

Admin

Reports

Help

DESPARZA

Logout



Search Permits

Related NPDES Violations

ADD SINGLE EVENT VIOLATION

List of Violations Related to the Permit

						Record Numbers 1 to 51
Violation Type	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Action
Schedule Violation	1 A CS031 Achieve Final Compliance With All Obligations Under This order	C40	05/07/2018	S-08/06/2018	5-08/06/2018	
Schedule Violation	1 A CS001 Pay Required Civil Penalty Amount	C10	08/10/2018			
Schedule Violation	1 A CS001 Pay Required Civil Penalty Amount	C20	08/10/2018			
Schedule Violation	1 A CS001 Pay Required Civil Penalty Amount	C30	08/10/2018	S-11/09/2018	4-12/23/2019	
Schedule Violation	1 A CS001 Pay Required Civil Penalty Amount	C40	08/10/2018	S-11/09/2018	4-01/07/2020	
Effluent Violation	001 A 00400 pH Effluent Gross Season ID:0 C3	E90	01/31/2018			
Effluent Violation	001 A 00400 pH Effluent Gross Season ID:0 C1	E90	02/28/2018			
Effluent Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C3	E90	11/30/2018			
Effluent Violation	001 A 81010 BOD, 5-day, percent removal Effluent Gross Season ID:0 C1	E90	01/31/2019			
Effluent Violation	001 A 81010 BOD, 5-day, percent removal Effluent Gross Season ID:0 C1	E90	02/28/2019			
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 Q1	D90	03/31/2019	N-05/16/2019	2-09/17/2019	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 Q2	D90	03/31/2019	K-05/16/2019	2-09/17/2019	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C2	D90	03/31/2019	N-05/16/2019	2-09/17/2019	

Violation Type	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Action
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C3	D90	03/31/2019	K-05/16/2019	9-05/16/2019	
DMR Non-Receipt Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C2	D90	03/31/2019	K-05/16/2019	2-09/17/2019	
Effluent Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C2	E90	03/31/2019			
DMR Non-Receipt Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C3	D90	03/31/2019	K-05/16/2019	2-09/17/2019	
Effluent Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C3	E90	03/31/2019			
DMR Non-Receipt Violation	001 A 81010 BOD, 5-day, percent removal Effluent Gross Season ID:0 C1	D90	03/31/2019			
Effluent Violation	001 A 81010 BOD, 5-day, percent removal Effluent Gross Season ID:0 C1	E90	04/30/2019			
Effluent Violation	001 A 81011 Solids, suspended percent removal Effluent Gross Season ID:0 C1	E90	04/30/2019			
Effluent Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C2	E90	05/31/2019			
Effluent Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C2	E90	06/30/2019			
Effluent Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C3	E90	06/30/2019			
Effluent Violation	001 A 81010 BOD, 5-day, percent removal Effluent Gross Season ID:0 C1	E90	01/31/2021			
Effluent Violation	001 A 81011 Solids, suspended percent removal Effluent Gross Season ID:0 C1	E90	01/31/2021			
Effluent Violation	001 A 81010 BOD, 5-day, percent removal Effluent Gross Season ID:0 C1	E90	04/30/2021			
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 Q1	D90	06/30/2021	N-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 Q2	D90	06/30/2021	K-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C2	D90	06/30/2021	N-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C3	D90	06/30/2021	K-08/15/2021	2-08/30/2021	

Violation Type	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Action
DMR Non-Receipt Violation	001 A 00400 pH Effluent Gross Season ID:0 C1	D90	06/30/2021			
DMR Non-Receipt Violation	001 A 00400 pH Effluent Gross Season ID:0 C3	D90	06/30/2021	K-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 Q1	D90	06/30/2021	N-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 Q2	D90	06/30/2021	K-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 C2	D90	06/30/2021	N-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 C3	D90	06/30/2021	K-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 00600 Nitrogen, total [as N] Effluent Gross Season ID:0 C2	D80	06/30/2021	N-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 00600 Nitrogen, total [as N] Effluent Gross Season ID:0 C3	D80	06/30/2021	K-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 00665 Phosphorus, total [as P] Effluent Gross Season ID:0 C2	D80	06/30/2021	N-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 00665 Phosphorus, total [as P] Effluent Gross Season ID:0 C3	D80	06/30/2021	K-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 C1	D80	06/30/2021	N-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 C2	D80	06/30/2021	K-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 C3	D80	06/30/2021	K-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 50060 Chlorine, total residual Disinfection, Process Complete Season ID:0 C3	D90	06/30/2021	K-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C2	D90	06/30/2021	N-08/15/2021	2-08/30/2021	

Violation Type	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Action
DMR Non-Receipt Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C3	D90	06/30/2021	K-08/15/2021	2-08/30/2021	
DMR Non-Receipt Violation	001 A 81010 BOD, 5-day, percent removal Effluent Gross Season ID:0 C1	D90	06/30/2021			
DMR Non-Receipt Violation	001 A 81011 Solids, suspended percent removal Effluent Gross Season ID:0 C1	D90	06/30/2021			
Effluent Violation	001 A 81010 BOD, 5-day, percent removal Effluent Gross Season ID:0 C1	E90	10/31/2021			
Effluent Violation	001 A 81011 Solids, suspended percent removal Effluent Gross Season ID:0 C1	E90	10/31/2021			

Record Numbers 1 to 51

[ICIS Home](#) [Reports](#) [Help](#) [Logout](#)
 [Back to Top](#)

Technical issues? Contact user support Help Desk at (202) 564-7756 or via email at ICIS@epa.gov

U.S. Environmental Protection Agency 