

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	01/20/2022	
Media Program:	Water	
Regulatory Program(s)	CWA	
Company Name:	Town of Taos	
Facility Name:	Taos WWTP	
Facility Physical Location:	182 Los Cordovas Drive	
(city, state, zip code)	Ranchos de Taos, New Mexico 87571	
Mailing address:	400 Camino de la Placita	
(city, state, zip code)	Taos, New Mexico 87571	
County/Parish:	Taos	
Facility Phone Number	757-751-2047	
Facility Contact:	Francisco Espinoza	Public Works Director
	fespinoza@taosgov.com	
FRS Number:	110022681267	
Identification/Permit Number:	NM0024066	
Media Identifier Number:	NA	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Gerald Salazar	SMA-Operations (Contract Operator)	Wastewater Operator III
Jerome Salazar	SMA-Operations (Contract Operator)	Wastewater Operator III
Jose Apodaca	SMA-Operations (Contract Operator)	Wastewater Operator III, Water Operator II and Laboratory Tech. I
Celsa Vigil	SMA-Operations (Contract Operator)	Laboratory Technician
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 Taos (Taos) Wastewater Treatment and Reclamation Facility (WWTP) approximately 12:00 AM on January 20, 2022, for an unannounced inspection. I presented my credentials to Mr. Gerald Salazar, on-site Contract Supervisor 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' representatives, observations made by the EPA inspector, NMED, and records and reports maintained by the permittee (Taos), and the EPA. Before leaving the facility on January 20, 2022, an exit briefing was held with Mr. Salazar, to explain areas of concern noted at the time of the inspection. It should be noted the WWTP also maintains a discharge permit (DP-232) issued by the New Mexico Environment Department (NMED), Groundwater Quality Bureau (GWQB) that allows a permitted discharge up to 2MGD.

FACILITY DESCRIPTION

The Town of Taos (Taos) WWTP facility is classified as a major discharger with a design capacity of 2.0 MGD and an average daily flow of 1.2 MGD, serving a population of approximately 11,000 that includes the Town of Taos, Taos Pueblo, El Prado, and communities within the Valle de Los Ranchos area as well as individual residences in the proximate area. The facility is located at 182 Los Cordovas Drive, Rancho de Taos, Taos County, New Mexico (denoted in Aerial Image #1 and further detailed in Aerial Image #2 below). The WWTP has been operated and managed under a contract agreement with SMA Operations, LLC. since 1991. WWTP hours of operation are Monday through Friday 8 AM to 5 PM.

The WWTP treatment process is comprised of a gravity collection system, and one (1) lift station (identified in Table #1). The influent then traverses through a splitter box that sends the flow to either the East or West aeration basins. These two (2) basins from the old WWTP have been configured such that half of each has a series of fine bubble diffusers to create an aerated zone, and the other half has mixers only that constitute the anoxic zone.

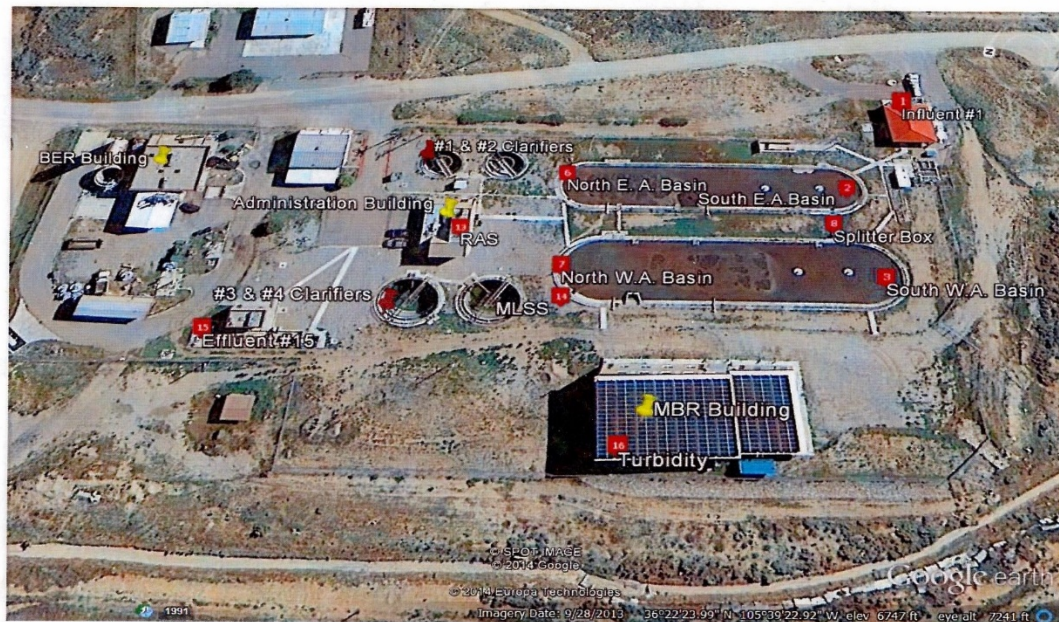
Thence the partially treated wastewater enters the MBR system, consisting of four (4) parallel basins with filters, aerators, and mixers operating simultaneously. Return Activated Sludge (RAS) is returned to the splitter box past the grit removal basin, where the Waste Activated Sludge (WAS) is pulled from the return line. After the sludge is dewatered from the belt press, the solids are deposited into roll-off bins for transport and landfill disposal. The processed water or Permeate Water is continuously sent through two (2) banks of Ultraviolet Disinfection (UV) system lights prior to discharge into an unnamed arroyo that flows for approximately ¾- mile thence into the Rio Pueblo de Taos a tributary to the Rio Grande.

Approximately 500k-gallons of disinfected effluent water, is sold to the Taos Country Club for maintenance of their golf course greens.

Septage and domestic (typically greywater) wastewater is received at the head works. According to WWTP records an average of approximately 140K-gallons of septage is received on a weekly basis (2021 Taos records). The facility staff monitors incoming registered septage haulers for pH and grease to determine compatibility with the WWTP for acceptance or rejection. This policy was adopted under Town of Taos Resolution 14-62 on November 25, 2014.



Aerial Image #1: Overall view of the Town of Taos' Wastewater Treatment and Reclamation Facility. Aerial from Google Earth maps.



Sample Locations		
1-Influent	6-North East Aeration Basin	12-#2 Clarifier (OOS)
2-South East Aeration Basin	7-North West Aeration Basin	13-Ras Line
3-South West Aeration Basin	8-Splitter Box	14-MLSS Line
4-Center East Aeration Basin	9-#3 Clarifier (OOS)	15-Effluent
5-Center West Aeration Basin	10-#1 Clarifier (OOS)	16-Turbidity
	11-#4 Clarifier (OOS)	

Aerial Image #2: Detailed overall view of the Town of Taos' Wastewater Treatment and Reclamation Facility. Aerial from Google Earth maps and provided by SMA Operations, LLC.

Table 1: Town of Taos Lift Stations

	Lift Station	Address
1	Town Hall	400 Camino de la Placita Taos

Taos does have 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 a current Fats, Oils and Grease (FOG) program policy with respect to existing and/or new FOG contributors. Additionally, their current Asset Management Schedule (Utility Improvement Fund) for 2021-2022 has been drafted and is awaiting legal approval for advertising.

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

Section II – OBSERVATIONS

I observed the following and/or the following information was provided or stated on January 20, 2022.

- The WWTP and all ancillary services are contract operated/managed by SMA Operations, LLC. and have been since 1991.
- The WWTP maintains a backup diesel generator for power that is exercised weekly.
- A Supervisory Control and Data Acquisition (SCADA) system provides around the clock monitoring of WWTP operations and is manned during normal working hours with alarm notifications in the off hours.
- No visible sheen, stressed vegetation or aromatics were observed at the WWTP outfall.
- The WWTP had secure perimeter fencing; thus, limiting access. The overall WWTP's operations and maintenance (O&M), and general facility housekeeping appeared to be in good order.

Section III – AREAS OF CONCERN

A review of the Integrated Compliance Information System (ICIS) database for the period from January 1, 2019, to January 20, 2022, indicates the following:

1. NPDES permit excursion- DMR non-receipt (*Lethal Survival Static Renewal 7 Day Chronic Ceriodaphnia dubia*)- March 2019
2. NPDES permit excursion- DMR non-receipt (*Lethal Survival Static Renewal 7 Day Chronic Pimephales promelas*)- March 2019
3. NPDES permit excursion- DMR non-receipt (*Sub-Lethal Reproduction Static Renewal 7 Day Chronic Ceriodaphnia dubia*)- March 2019
4. NPDES permit excursion- DMR non-receipt (*Sub-Lethal Reproduction Static Renewal 7 Day Chronic Pimephales promelas*)- March 2019
5. NPDES permit excursion- Nitrogen Ammonia Total [as N]- December 2020, January 2021, and February 2021
6. NPDES permit excursion- Mercury, total [as Hg] - August March 2021, and September 2021

EPA Region 6 inspector David Esparza conducted a closing conference at the Town of Taos' WWTP approximately at 3:00 PM on January 20, 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 20, 2022:

- Town of Taos - FOG policy – section taken from the Town Code title 13 Section 13.12.100

- The location of Taos' one (1) lift station- at Town Hall 400 Camino de la Placita Taos- serviced quarterly
- A form that the operators use in the event of a sanitary sewer overflow (SSO) protocol or Best Management Practices (BMP).
- A current/updated Site Map/Plan.
- A summary of the approximate quantity of septage volumes for calendar year 2021.
- SCADA – A snapshot of SCADA system.

Section V – LIST OF APPENDICES

Appendix 1 – A Review of the Integrated Compliance Information System (ICIS) Database for the period from January 1, 2019, to January 20, 2022

Appendix 1

A Review of the Integrated Compliance Information
System (ICIS) Database
for
the period from
January 1, 2019, to January 20, 2022

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Related NPDES Violations

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List of Violations Related to the Permit

Record Numbers 1 to 15

Violation Type	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Action
DMR Non-Receipt Violation	TX1 Q TXP3B LOEC Lethal Survival Static Renewal 7 Day Chronic Ceriodaphnia dubia Effluent Gross Season ID:0 C3	D80	03/31/2019	K-05/16/2019	2-05/22/2019	
DMR Non-Receipt Violation	TX1 Q TXP6C LOEC Lethal Survival Static Renewal 7 Day Chronic Pimephales promelas Effluent Gross Season ID:0 C3	D80	03/31/2019	K-05/16/2019	2-05/22/2019	
DMR Non-Receipt Violation	TX1 Q TYP3B LOEC Sub-Lethal Reproduction Static Renewal 7 Day Chronic Ceriodaphnia dubia Effluent Gross Season ID:0 C3	D80	03/31/2019	K-05/16/2019	2-05/22/2019	
DMR Non-Receipt Violation	TX1 Q TYP6C LOEC Sub-Lethal Reproduction Static Renewal 7 Day Chronic Pimephales promelas Effluent Gross Season ID:0 C3	D80	03/31/2019	K-05/16/2019	2-05/22/2019	
Effluent Violation	001 A 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 Q1	E90	12/31/2020			
Effluent Violation	001 A 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 Q2	E90	12/31/2020	R-01/31/2021	2-05/31/2021	
Effluent Violation	001 A 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C2	E90	12/31/2020			
Effluent Violation	001 A 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C3	E90	12/31/2020	R-01/31/2021	2-05/31/2021	
Effluent Violation	001 A 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C2	E90	01/31/2021			
Effluent Violation	001 A 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C3	E90	01/31/2021	R-01/31/2021	2-05/31/2021	
Effluent Violation	001 A 00610 Nitrogen, ammonia total [as N] Effluent Gross Season ID:0 C3	E90	02/28/2021			
Effluent Violation	001 A 71900 Mercury, total [as Hg] Effluent Gross Season ID:0 C2	E90	08/31/2021			

Violation Type	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Action
Effluent Violation	001 A 71900 Mercury, total [as Hg] Effluent Gross Season ID:0 Q2	E90	09/30/2021			
Effluent Violation	001 A 71900 Mercury, total [as Hg] Effluent Gross Season ID:0 C2	E90	09/30/2021			
Effluent Violation	001 A 71900 Mercury, total [as Hg] Effluent Gross Season ID:0 C3	E90	09/30/2021			

Record Numbers 1 to 15

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