

INSPECTION REPORT

Inspection Entry Date/Time	03/01/2023 04:00 PM (MT)	Announced: No
Inspection Exit Date/Time	03/01/2023 04:40 PM (MT)	Access: Granted
Weather	Day 1 – sunny	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, WWTP	
Type of Inspection	FCI - Focused Compliance Inspection	
Permittee Name	Camino Real Regional Utility Authority (CRRUA)	
Facility or Site Name	Sunland Park Wastewater Plant	
Facility/Site Physical Address	1000 McNutt Road	
City, State, Zip Code	Sunland Park, NM 88063	
County/Borough/Parish		
Facility GPS Coordinates	31.79564, -106.5566	
Mailing Address (If different)		
City, State, Zip Code		
FRS ID	110011027174	
Permit Number(s) (If Applicable)	NM0029483	
SIC and/or NAICS	4952	
Regulatory Representatives Participating in Inspection:		
Organization	Name	Title
EPA Region 6	Amy Andrews, P.E.	Lead Inspector / Environmental Engineer
NMED/SWQB	Jason Martinez	Environmental Specialist
Lead Inspector:		
Amy Andrews	 AMY ANDREWS Digitally signed by AMY ANDREWS DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=AMY ANDREWS, 0.9.2342.19200300.100.1.1=68001003655888 Date: 2023.04.14 13:22:23 -06'00'	04/14/2023
	EPA Region 6	andrews.amy@epa.gov (214) 907-0638
Supervisor Review:		
Roberto Bernier	 ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2023.04.17 09:09:34 -05'00'	
	EPA Region 6	Bernier.roberto@epa.gov (214) 665-8376

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

EPA Region 6 Lead Inspector, Amy Andrews, arrived at the Sunland Park Wastewater Plant (the “Site” or “Facility”), located at 1000 McNutt Road, Sunland Park, NM 88063, at 04:00 PM (MT) on 03/01/2023 for an unannounced inspection. EPA Region 6 Lead Inspector presented credentials to Eric Lopez 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 Sunland Park Wastewater Plant 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 Sunland Park Wastewater Plant 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 Sunland Park Wastewater Plant 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	Amy Andrews, P.E.	Lead Inspector / Environmental Engineer	Yes	Yes
NMED/SWQB	Jason Martinez	Environmental Specialist	Yes	Yes
Bridel Facility Operations	Eric Lopez	Operations Specialist	Yes	Yes

Facility/Site Description

EPA Region 6 lead inspector confirmed the following facility information:

The Sunland Park WWTP is classified as a major municipal discharger under the CWA, Section 402, of the NPDES permit program and is authorized to discharge up to 2.0 million gallons per day (MGD) based on design flow. The permittee is authorized to discharge treated municipal wastewater from Outfall 001 to the Rio Grande River Basin, in waterbody segment 20.6.4.101 (NMAC, State of New Mexico Standards for Interstate and Intrastate Surface Waters) of the Rio Grande Basin. This segment includes the designated uses of irrigation, marginal warmwater aquatic life, livestock watering, wildlife habitat and primary contact.

Facility/Site Information

Responsible official	Brent Westmoreland, Executive Director
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Location(s)

Location/Area/Sub-area	Description
1 - Collection System	The influent from the City of Sunland Park and Santa Teresa is pumped to the WWTP through the main lift station. The wastewater originating from the Sunland Park Racetrack is also pumped to the WWTP through a separate lift station. There are a total of Seven (7) lift stations within the city's sewer collection system.
2 - Treatment System	Preliminary treatment at the headworks includes a (recently rehabilitated) mechanical bar screen and grit chamber, after which the wastewater is transferred to the aeration basin, air is provided by three (3) blowers. Two blowers run continuously while the other is on stand-by. Two (2) of the three (3) blowers have been recently rebuilt (but not replaced). From the aeration basin, wastewater flows to two (2) circular final clarifiers where return activated sludge (RAS) is returned to the aeration basin, waste activated sludge (WAS) is pumped to the digester, and clarified wastewater flows to an ultraviolet (UV) disinfection unit.
3 - Flow Meters & Outfall	UV disinfection is by a TrojanUV300plus which was recently replaced. The treated effluent then passes through a Parshall flume for flow measurement and then is discharged to the Rio Grande.
4 - Biosolids/Sludge	The sludge thickener and four-cell aerobic digester receives waste activated sludge from the clarifiers where the sludge is thickened and then sent to a belt press for dewatering. Polymer is used for greater solids separation. There are also three (3) drying beds used as a backup if the belt press is inoperable. The dewatered sludge is transported to Corralitos Landfill, owned and operated by South Central Solid Waste Authority.

SECTION II – OBSERVATIONS

Location: 2 - Treatment System		
Observation #: AA2-OB-001	Date: 03/01/2023	Weather: sunny
Bar screen and grit pumps were rebuilt in late 2022 by C&E. An epoxy coating was used for structural stability. The bar screen is fully automated. The grit drain line has been rerouted and the grit auger runs for 15 minutes out of every hour.		
Photo(s) 1. DSCN1806.JPG 2. DSCN1807.JPG		

Observation #: AA2-OB-002	Date: 03/01/2023	Weather: sunny
RAS and WAS pumps are old and are in need of replacement, however as a cost saving measure, they are constantly being rebuilt instead of replaced. Eric stated that CRRUA is getting Asset Management software soon, but he's concerned that they may not have the personnel who have time to learn and run the software.		
Photo(s) 1. DSCN1811.JPG 2. DSCN1812.JPG 3. DSCN1814.JPG 4. DSCN1816.JPG		
Observation #: AA2-OB-004	Date: 04/12/2023	Weather:
Aeration lines in the aeration basin are leaking and blowing wastewater out of the basin and onto the ground.		
Photo(s) 1. DSCN1799.JPG 2. DSCN1800.JPG 3. DSCN1802.JPG 4. DSCN1803.JPG 5. DSCN1804.JPG 6. DSCN1805.JPG 7. DSCN1808.JPG 8. DSCN1809.JPG 9. DSCN1810.JPG		

Location: 3 - Flow Meters & Outfall		
Observation #: AA2-OB-003	Date: 04/12/2023	Weather:
The UV disinfection system was recently replaced and is running well. The autosampler had also been replaced and a thermometer was present and at the proper temperature.		
Photo(s) 1. DSCN1793.JPG 2. DSCN1794.JPG 3. DSCN1796.JPG		

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: Overflow/Bypass/Upset Reports or Notifications		AOC: No
Ref #: AA2-RR-002	Reviewed By: Amy Andrews	Reviewed Date: 04/12/2023
Three sanitary sewer overflows were reported between 10/01/2022 and 12/31/2022: 11/01/2022 - estimated 5,000 gallons, 3 hours in duration, section of force main line failed 11/04/2022 - estimated 6,000 gallons, 4 hours in duration, section of force main line failed 12/10/2022 - estimated 1,200 gallons, 2 hours in duration, failed controller on vacuum manhole CRRUA has recently obtained funding to repair and replace lines in the collection system.		
Record: DMR Reports		AOC: No
Ref #: AA2-RR-001	Reviewed By: Amy Andrews	Reviewed Date: 04/12/2023
DMR Reports and corresponding laboratory bench sheets from October 2022, November 2022, and December 2022 were submitted by the permittee and reviewed by the lead inspector. DMR Values reported in the EPA database were reviewed from 3/1/2022 to 2/28/2023. Effluent limit excursions of biochemical oxygen demand (BOD), including percent removal, were noted during the months of June 2022, November 2022, December 2022, and January 2023. Effluent limit excursions of total suspended solids (TSS) were noted during the months of November 2022, December 2022, and January 2023. Effluent limit excursions of Escherichia coli (E. coli) have been recorded for the months of April 2022, May 2022, June 2022, September 2022, November 2022, December 2022, and January 2023.		
Document(s)		
1. Effluent Violations E90 For Single NPID With Date Range Mar2022-Feb2023.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 #: AA2-OB-002	Location: 2 - Treatment System
Regulation and/or Permit Requirement NM0029483 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: RAS and WAS pumps are old and are in need of replacement, however as a cost saving measure, they are constantly being rebuilt instead of replaced. Eric stated that CRRUA is getting Asset Management software soon, but he's concerned that they may not have the personnel who have time to learn and run the software.	
Additional Notes:	

AOC Reference #: AA2-OB-004	Location: 2 - Treatment System
Regulation and/or Permit Requirement NM0029483 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: Aeration lines in the aeration basin are leaking and blowing wastewater out of the basin and onto the ground.	
Additional Notes:	

AOC Reference #: AA2-RR-001	Records Review: DMR Reports
Regulation and/or Permit Requirement NM0029483 I.a.1.	
I.a.1. - LIMITATIONS AND MONITORING REQUIREMENTS Effluent Limits	
AOC: Effluent limit excursions of biochemical oxygen demand (BOD), including percent removal, were noted during the months of June 2022, November 2022, December 2022, and January 2023. Effluent limit excursions of total suspended solids (TSS) were noted during the months of November 2022, December 2022, and January 2023. Effluent limit excursions of Escherichia coli (E. coli) have been recorded for the months of April 2022, May 2022, June 2022, September 2022, November 2022, December 2022, and January 2023.	
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 04:40 PM (MT) on 03/01/2023 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

Requested documentation was received after exiting the facility on 03/01/2023.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Effluent Limit Exceedances

APPENDIX 1: PHOTO LOG



Photo 1	DSCN1793.JPG	
03/01/2023 04:10 PM	Photographer: Amy Andrews	
3 - Flow Meters & Outfall	No CBI	No PII
View of finger weirs just past UV disinfection. Effluent appears clear.		



Photo 2	DSCN1794.JPG	
03/01/2023 04:11 PM	Photographer: Amy Andrews	
3 - Flow Meters & Outfall	No CBI	No PII
View of the effluent flow channel showing UV disinfection system.		



Photo 3	DSCN1796.JPG	
03/01/2023 04:11 PM	Photographer: Amy Andrews	
3 - Flow Meters & Outfall	No CBI	No PII
UV disinfection system.		



Photo 4	DSCN1799.JPG	
03/01/2023 04:13 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
Wastewater is being aerosolized and blown out of aeration basin due to leaks in the air lines. Wastewater is coating walkways, the outside of the basin, and the ground around the basin.		



Photo 5	DSCN1800.JPG	
03/01/2023 04:14 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
Wastewater is being aerosolized and blown out of aeration basin due to leaks in the air lines. Wastewater is coating walkways, the outside of the basin, and the ground around the basin.		



Photo 6	DSCN1802.JPG	
03/01/2023 04:15 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
Wastewater is being aerosolized and blown out of aeration basin due to leaks in the air lines. Wastewater is coating walkways, the outside of the basin, and the ground around the basin.		



Photo 7	DSCN1803.JPG	
03/01/2023 04:15 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
Wastewater is being aerosolized and blown out of aeration basin due to leaks in the air lines. Wastewater is coating walkways, the outside of the basin, and the ground around the basin.		



Photo 8	DSCN1804.JPG	
03/01/2023 04:15 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
Wastewater is being aerosolized and blown out of aeration basin due to leaks in the air lines. Wastewater is coating walkways, the outside of the basin, and the ground around the basin.		

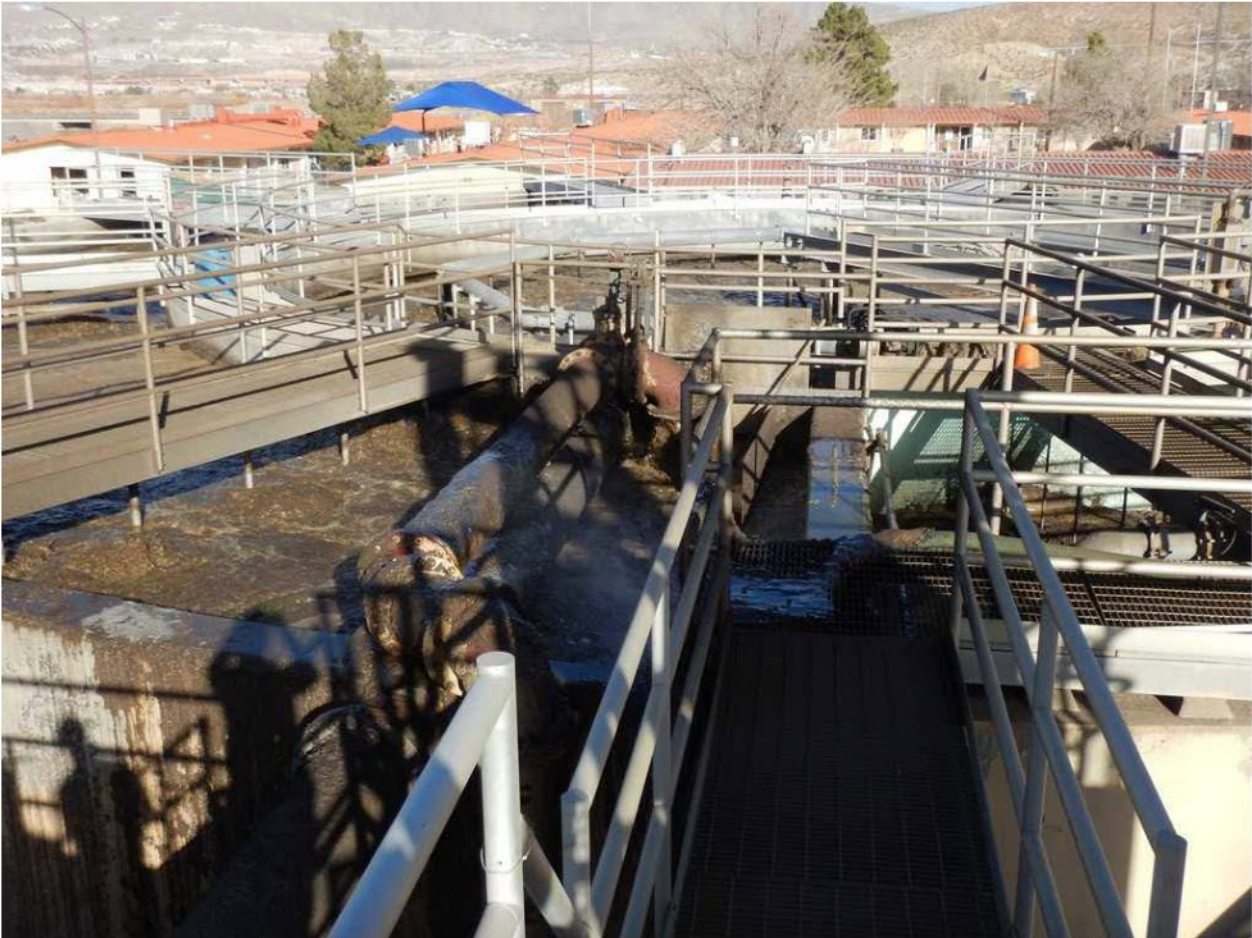


Photo 9	DSCN1805.JPG	
03/01/2023 04:15 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
Wastewater is being aerosolized and blown out of aeration basin due to leaks in the air lines. Wastewater is coating walkways, the outside of the basin, and the ground around the basin.		



Photo 10	DSCN1806.JPG	
03/01/2023 04:16 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
New bar screen.		



Photo 11	DSCN1807.JPG	
03/01/2023 04:16 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
New bar screen.		



Photo 12	DSCN1809.JPG	
03/01/2023 04:21 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
Wastewater is ponding and drying on the ground outside of the aeration basin due to leaks in the air lines.		



Photo 13	DSCN1810.JPG	
03/01/2023 04:21 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
Wastewater is ponding and drying on the ground outside of the aeration basin due to leaks in the air lines.		



Photo 14	DSCN1811.JPG	
03/01/2023 04:22 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
Pumps and blower motors in various states of being rebuilt.		



Photo 15	DSCN1814.JPG	
03/01/2023 04:23 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
Pumps and blower motors in various states of being rebuilt.		



Photo 16	DSCN1816.JPG	
03/01/2023 04:24 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
Pumps and blower motors in various states of being rebuilt.		

APPENDIX 2: EFFLUENT LIMIT EXCURSIONS

Permit NM0029483 - Query Dates 3/1/2022 to 2/28/2023

Permit Name	Major Minor Status	Issue Date	Effective Date	Expiration Date
CAMINO REAL REGIONAL UTILITY AUTHORITY	Major	9/17/2020	11/1/2020	10/31/2025

Outfall 001A

00310 BOD, 5-day, 20 deg. C / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
11/1/2020	10/31/2025	6 Hour Composite	Weekly

Limit			
Limit Unit Desc	Pounds per Day	Milligrams per Liter	Milligrams per Liter
Statistical Base	7 DA AVG	30DA AVG	7 DA AVG
Limit Value	534.	25.	32.
DMR Values			
6/30/22			33
11/30/22		38.4	62.6
12/31/22	1039.5	62.79	190
1/31/23		25.7	

00530 Solids, total suspended / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
11/1/2020	10/31/2025	6 Hour Composite	Weekly

Limit			
Limit Unit Desc	Pounds per Day	Milligrams per Liter	Milligrams per Liter
Statistical Base	7 DA AVG	30DA AVG	7 DA AVG
Limit Value	750.	30.	45.
DMR Values			
11/30/22		34.08	48.2
12/31/22		38.63	111
1/31/23	2271.3		

51040 E. coli / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
11/1/2020	10/31/2025	Grab	Five per Week

Limit			
Limit Unit Desc	Colony Forming Units per 100ml	Colony Forming Units per 100ml	Colony Forming Units per 100ml
Statistical Base	30DAVGEO	7DAV GEO	DAILY MX
Limit Value	126.	126.	410.
DMR Values			
4/30/22			648.8
5/31/22		222.5	2419.8
6/30/22		180.7	1413.6
9/30/22			920.8
11/30/22	137.6	1268	>6659
12/31/22		>2419.6	44958
1/31/23		146.3	>2419.6

81010 BOD, 5-day, percent removal / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
11/1/2020	10/31/2025	Calculated	Weekly

Limit	
Limit Unit Desc	Percent
Statistical Base	MO AV MN
Limit Value	85.
DMR Values	
12/31/22	79.56