United States Environmental Protection Agency

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Inspection Date(s):	7/31/2018		
Media:	Water		
Regulatory Program(s)	CWA – NPDES		
Company Name:	**Camino Real Regional Utility Authority (CRRUA)**		
Facility Name:	**Sunland Park Waste Water Treatment Plant**		
Facility Physical Location:	1000 McNutt Road		
(city, state, zip code)	Sunland Park, NM 88063		
Mailing address:	1000 McNutt Road		
(city, state, zip code)	Sunland Park, NM 88063		
County/Parish:	Dona Ana County		
Facility Contact:	Brent Westmoreland	Utility Executive Director	
	brentw@donaanacounty.org		
FRS Number:	110011027174		
Identification/Permit Number:	NM0029483		
Media Number:			
NAICS:	221320		
SIC:	4952		

Personnel participating in inspection:			
Amy Andrews, P.E.	USEPA/6EN-WMH	Environmental Engineer	214-907-0638
Jennifer Foote	NMED/Point Source Regulation	Inspector	505-827-0596
Carlos Guebara	Bridel Facility Operations	Contract Wastewater Operator	575-589-1075

EPA Lead Inspector Signature/Date	AMY ANDREWS Digitally signed by AMY ANDREWS DN: c=US, o=U.S. Government, ou=USEPA, ou=Staff, cn=AMY ANDREWS, dnQualifier=0000131170 Date: 2018.10.11 14:54:52 -06'00'	
	Amy Andrews	Date
Supervisor Signature/Date	CAROL PETERS-WAGNON Digitally signed by CAROL PETERS-WAGNON DN: c=US, o=U.S. Government, ou=USEPA, ou=Staff, cn=CAROL PETERS-WAGNON, dnQualifier=0000009981 Date: 2018.10.12 10:48:27 -05'00'	
	Carol Peters	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

Environmental Protection Agency (EPA) Region 6 inspector Amy Andrews arrived at the Camino Real Regional Utility Authority (CRRUA) Sunland Park Waste Water Treatment Plant (WWTP) at 9:30 AM on July 31, 2018 for an unannounced inspection. I met with Carlos Guebara, the facility's contracted Wastewater Treatment Operator who works for Bridel Facility Operations. I presented my credentials to Mr. Guebara and informed him that this was an EPA inspection to determine compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act (CWA). The inspection was conducted under the authority of the NPDES permit program, in accordance with the Federal CWA. This report is based on information supplied by CRRUA Sunland Park WWTP representatives (the permittee), observations made by the EPA inspector, and records and reports maintained by the permittee and the EPA.

FACILITY DESCRIPTION

The CRRUA Sunland Park WWTP is located on McNutt Road, Sunland Park, New Mexico in Dona Ana County. The facility is a non-pretreatment facility classified as a major municipal discharger, permitted for 2.0 million gallons per day (MGD) of discharge with an actual average flow maintained around 1.5 – 1.6 MGD. Discharge is into the Rio Grande River located at Latitude 31° 47' 54" North and Longitude 106° 33' 24" West. The facility is operated 40 hours per week with a total of 6 workers, 3 of which are WWTP Operators, however one of the operators is usually offsite, working at the CRRUA Santa Theresa WWTP. Wastewater travels to the Sunland Park WWTP via 20 lift stations which are shared with the Santa Theresa WWTP. The works at the Sunland Park WWTP include automatic bar screens with manual backup and a grit removal chamber, aeration basins, two clarifiers and an ultraviolet disinfection (UV) unit. Waste activated sludge goes to a sludge thickener and then to the four-cell aerobic digester. Stabilized sludge is typically dried using the belt press, with backup drying beds for when the belt press goes down. The belt press typically fills two to three roll-off containers per day. Dried biosolids and grit removed by the grit chamber go to the Camino Real Municipal Landfill

Section II - OBSERVATIONS

Sunland Park WWTP is currently the only operational WWTP in the vicinity that is discharging to the river, however there is a West Mesa WWTP that operates on a lagoon system, and the Santa Theresa plant wasn't online yet, as of the date of this inspection (expected startup September 2018). The Sunland Park WWTP was built in 1988 and is in serious need of rehabilitation; plans for upgrading this WWTP are slated to begin the planning phase after the Santa Theresa WWTP comes online.

Section III – AREAS OF CONCERN

Requirement 1

NPDES Permit NM0029483, Part III: Standard Conditions B.3. Proper Operation and Maintenance a. *The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit.*

Concern 1

The permittee reports that parts are often breaking down, but there is a pumping equipment parts store just down the road who is able to keep many of the needed parts in stock. At the time of this inspection, all trains of the plant were online, however the age of the plant is evident (and can be seen in the Photo Log in Appendix A), in the rusting steel joists holding up the walkways, the rusting (and leaking) vent pipe in the aeration basin, clarifier weirs which need leveling, and the broken hood vent fan in the laboratory. The UV system is difficult to find parts for (not available at the pumping equipment parts store) and is supposed to save energy by not coming on at full power unless the water is at a high turbidity, however due to a malfunction, currently it is either on full power, or completely off. Only four of the eight UV banks are currently operational.

Requirement 2

NPDES Permit NM0029483, Part III.C.5. *b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities*

Concern 2

pH buffer solutions had a written date of “5/28/16” on them, however there was no other written identification to say whether this date was the received-on date, or the opened-on date. The manufacturer of these solutions, “USABlueBook” states that they must be used within 6 months after opening. Received-on dates, opened-on dates, and expiration date based on the earliest of six months after opening, or manufacturers printed expiration date should be written on every bottle, including smaller, temporary bottles (if used). It was therefore impossible to confirm proper calibration of the pH instrument.

Requirement 3

NPDES Permit NM0029483, Part III: C.2. *Representative Sampling: Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.*

Concern 3

Sampling for Boron is typically collected on consecutive days each week, instead of spread over the week. It is possible that the samples are not representative of the entire process if there are variations in the wastewater stream throughout the week (i.e., higher residential flow over the weekend vs higher industrial flow during the week).

Requirement 4

NPDES Permit NM0029483, Part III: Standard Conditions B.3.a. Proper Operation and Maintenance: *The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control {and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate, quality assurance procedures.*

Concern 4

The permittee was unable to demonstrate that Standard Operating Procedures existed for laboratory procedures.

Requirement 5

NPDES Permit NM0029483, Part III: A.2. Duty to Comply: *The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and its grounds for enforcement action; for permit termination; revocation and reissuance, or modification; or for denial of a permittee renewal application.*

Concern 2

Permit limits (as listed in NPDES Permit NM0029483, Part I: A.1. Final Effluent Limits) have been exceeded for E. coli repeatedly in 2018, and Whole Effluent Toxicity testing failed in February 2018.

Section IV – FOLLOW UP

The following information was received by EPA after exiting the Facility on 7/31/2018:

- Email and phone correspondence on 9/18/2018, 9/19/2018, 9/20/2018, 9/25/2018, 9/29/2018, and 10/4/2018
- WET testing results were received from the facility on 9/19/2018 and 10/4/2018
- Pollutant sampling results and sludge sampling results were received from the facility on 10/4/2018

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 5 photos taken 7/31/2018

Appendix 1
Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Camino Real Regional Utility Authority (CRRUA)/Sunland Park Waste Water Treatment Plant		
City: Sunland Park	County/Parish: Doña Ana	State: New Mexico

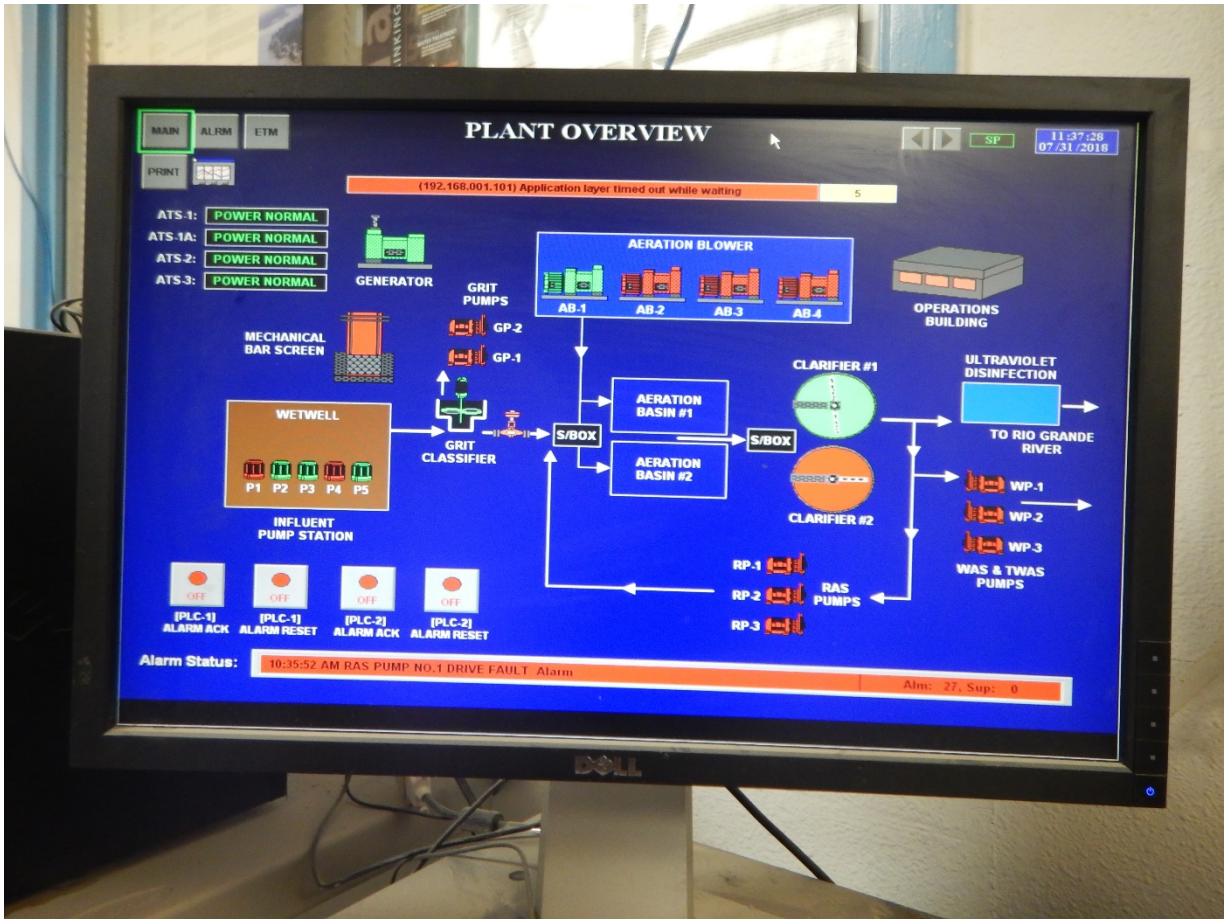

Photo File Name: DSCN0464.JPG
Date of Photo: 7/31/2018
Time of Photo: 11:39 AM
Photographer: Amy Andrews
Description: Plant overview in the Sunland Park WWTP supervisory control and data acquisition SCADA system.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Camino Real Regional Utility Authority (CRRUA)/Sunland Park Waste Water Treatment Plant		
City: Sunland Park	County/Parish: Doña Ana	State: New Mexico

Photo File Name: DSCN0453.JPG
Date of Photo: 7/31/2018
Time of Photo: 11:02 AM
Photographer: Amy Andrews
Description: Rusting I-beam under walkway over splitter box prior to aeration basins.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Camino Real Regional Utility Authority (CRRUA)/Sunland Park Waste Water Treatment Plant		
City: Sunland Park	County/Parish: Doña Ana	State: New Mexico

Photo File Name: DSCN0456.JPG
Date of Photo: 7/31/2018
Time of Photo: 11:04 AM
Photographer: Amy Andrews
Description: Aeration basin with air leaks in rusting air distribution pipes.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Camino Real Regional Utility Authority (CRRUA)/Sunland Park Waste Water Treatment Plant		
City: Sunland Park	County/Parish: Doña Ana	State: New Mexico

Photo File Name: DSCN0458.JPG
Date of Photo: 7/31/2018
Time of Photo: 11:13 AM
Photographer: Amy Andrews
Description: Clarifier weirs in need of releveling.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Camino Real Regional Utility Authority (CRRUA)/Sunland Park Waste Water Treatment Plant		
City: Sunland Park	County/Parish: Doña Ana	State: New Mexico

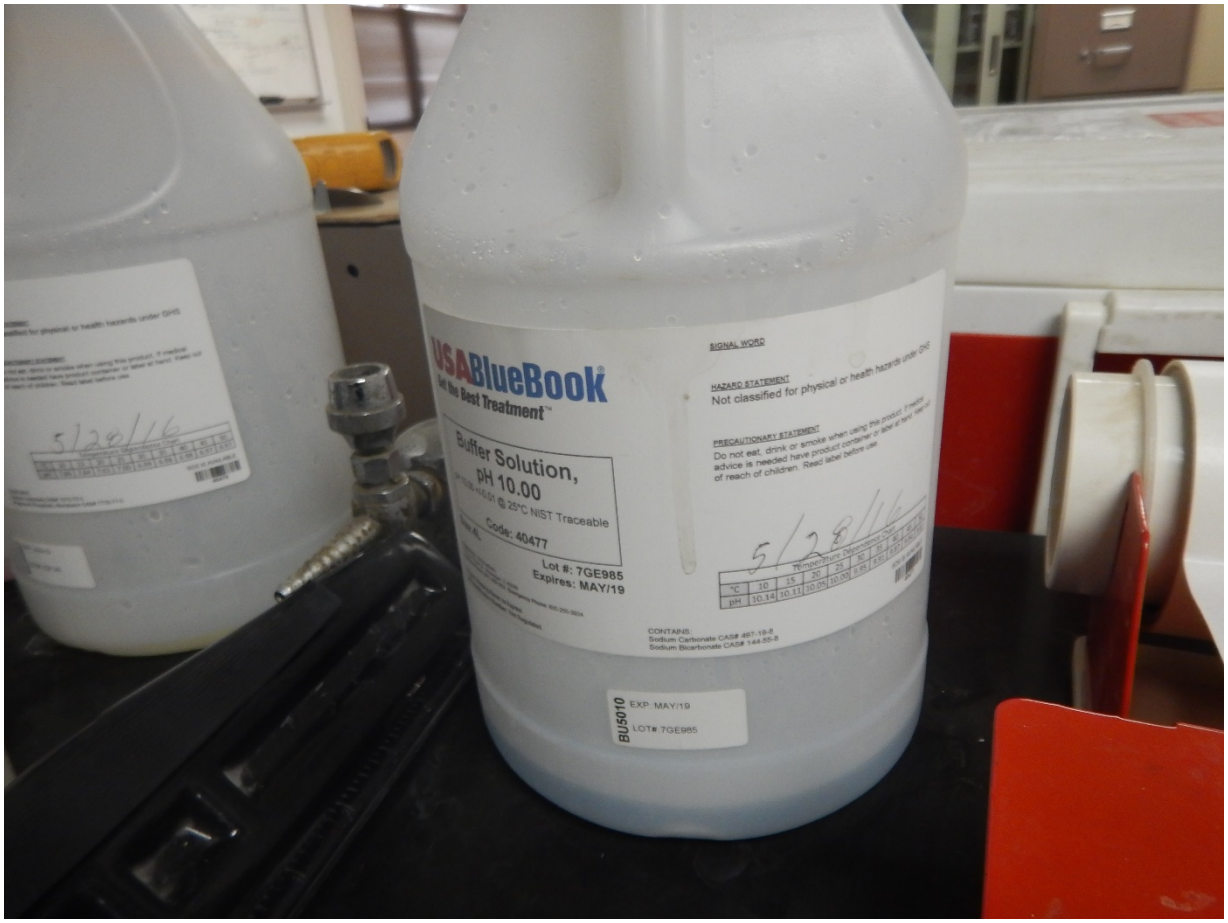

Photo File Name: DSCN0465.JPG
Date of Photo: 7/31/2018
Time of Photo: 11:44 AM
Photographer: Amy Andrews
Description: pH buffer bottles with a written date of “5/28/16” on them, however the meaning of the date written is unclear.