

**Region 6 - Enforcement & Compliance Assurance Division**  
**INSPECTION REPORT**

|                                        |                                                              |                        |
|----------------------------------------|--------------------------------------------------------------|------------------------|
| Inspection Date(s):                    | 01/17/2024                                                   |                        |
| 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          |
|                                        | <a href="mailto:awwtplant@gmail.com">awwtplant@gmail.com</a> |                        |
| 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     |
| David Esparza                          | EPA-R6/ECDWM                                                 | Environmental Engineer |
| EPA Lead Inspector<br>Signature/Date   |                                                              |                        |
|                                        | David Esparza                                                | 01/17/2024             |
| Supervisor<br>Signature/Date           |                                                              |                        |
|                                        | Roberto Bernier                                              | 1/17/2024              |

## **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) Hall at approximately 12:30 PM on January 17, 2024, for a discussion with Ms. Georgiana Rael, Town Clerk/Administrator regarding the status of a previous Administrative Order (AO) resulting from a caustic spill resulting in a fish kill. At approximately 2:30 PM I arrived at the Wastewater Treatment Plant (WWTP) for an unannounced inspection. I met with 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 17, 2024, 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 3 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, two (2) lift station (identified in Table #1), headworks comprised of a bar screen/grit removal system, grit cyclone, screened fine mesh filter, three (3) trains of Rotating Biological Contactors (RBCs): one (1) for biological oxygen demand (BOD) removal and two (2) for ammonia removal, two (2) parallel final clarifiers, three (3) parallel ultraviolet (UV) disinfection banks, thence the disinfected effluent traverses over a stepped cascade structure prior to discharge to the Red River via a closed conduit pipe (Appendix 1 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 force 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 1,200 gallons each time is received.

## Section II – OBSERVATIONS

I observed the following and/or the following information was provided or stated on January 17, 2024.

- The WWTP does not have back-up for some of its aging treatment process equipment, 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.
- The previous stockpiled sludge has been transported and disposed. In approximately December 2023 new sludge material was stockpiled. WWTP personnel requested information regarding the applicable 40 CFR Part 503-Biosolids criteria.
- Overall maintenance and operation of the WWTF appeared to be satisfactory. All equipment looked to be running properly. The one (1) screened fine mesh filter previously off-line has been repaired.
- 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. On July 10, 2018, a first Amended Administrative Complaint (Complaint) (Docket #CWA-06-2018-1786) was issued. On December 4, 2019, a Consent Agreement and Final Order (CAFO) (Docket #CWA-06-2018-1786) was issued, regarding the January 2018 bulk caustic soda spill and included provisions to Supplemental Environmental Project (SEP) parameters. Ms. Rael, Town Administrator offered that due to the Covid passing of the WWTP supervisor, availability of the fish species and raising costs, the Town is in the process of submitting a proposal to remit the monetary amount in lieu of continuing to pursue acquisition of the fish from the Nebraska hatchery.
- The Town participated in the FY-22 EPA-Compliance Advisor Program (CAP) and was provided or assisted in the development of the following:
  1. A general Sanitary Sewer Overflow (SSO) response procedure and implementation plan.
  2. Policies and procedures for most of the processes across the facility
  3. Preparation of their pretreatment program for industrial dischargers.
  4. Standard operating procedures (SOP) for sludge removal and pumping times with setpoints identified. The facility has observed reduced solids carryover into the ultra-violet (UV) disinfection system since implementation.
  5. Chemical Storage and Handling- prepared a Spill Prevention Plan (SPCC) in accordance with §311 of the Clean Water Act (CWA) (<https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations>) and the SPCC Rule (40 CFR 112).
  6. Labeled storage tanks and pumping equipment- signage has been placed on out-of-service storage tanks and other outdated equipment for the Fire Marshall.
  7. Cleared escape routes- Debris and excess equipment have been removed from escape routes and around fire extinguishers and properly disposed.
  8. Updated their Emergency Response Plan
  9. Prepared an initial Asset Management Plan

### **Section III – AREAS OF CONCERN**

- A review of the submitted Integrated Compliance Information System (ICIS) Discharge Monitoring Reports (DMR) data for the period January 22, 2022, through January 31, 2023, indicates NPDES permit excursions with respect to Total Suspended Solids (TSS), and 5-day Biological Oxygen Demand (BOD<sub>5</sub>) (**Appendix 2 ICIS E90 Effluent Violations**).

### **Section IV- RECOMMENDATIONS**

- Ensure the Town's written proposal to remit the monetary amount in lieu of continuing to pursue acquisition of the fish from the Nebraska hatchery includes applicable Docket Number identification and associated points of contact (POC).

EPA Region 6 inspector David Esparza conducted a closing conference at Town of Red River's WWTP approximately at 3:30 PM on January 17, 2024, for the inspection.

### **Section IV – FOLLOW UP**

No additional information was received by EPA, after exiting the Facility on January 17, 2024.

### **Section V – LIST OF APPENDICES**

Appendix 1 – Red River WWTP Hydraulic Profile  
Appendix 2 – ICIS E90 Effluent Violations

## Appendix 1

### Red River WWTP Hydraulic Profile

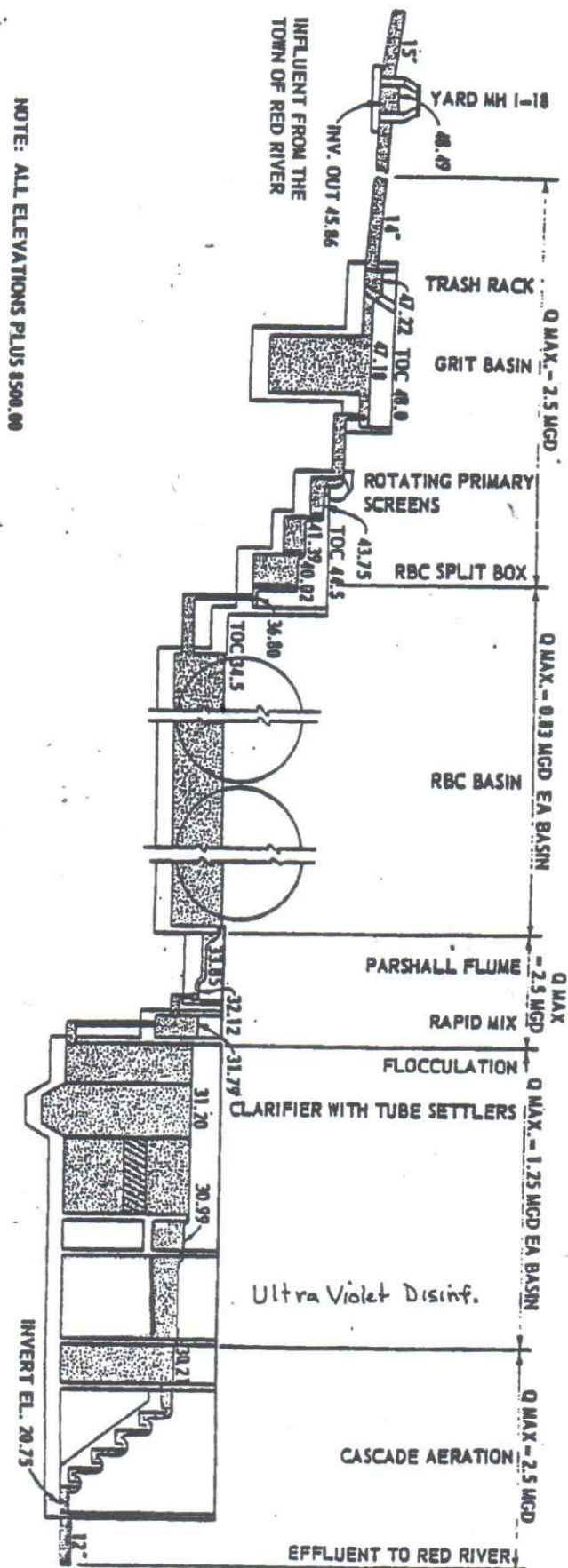


Figure I-1. HYDRAULIC PROFILE

Appendix 2  
Review  
of the  
ICIS  
E90 Effluent Violations

## **E90 Effluent Violations From 01/01/2019 - Present**

**NM0024899**

### **RED RIVER AWWT, TOWN**

| Monitoring<br>Period End<br>Date | Perm<br>Feature<br>ID | Limit Set<br>Designator | Parameter Desc            | Statistical<br>Base Short<br>Desc | Limit<br>Unit<br>Short<br>Desc | Limit<br>Value | DMR<br>Value<br>Qualif<br>ier<br>Code | DMR<br>Value |
|----------------------------------|-----------------------|-------------------------|---------------------------|-----------------------------------|--------------------------------|----------------|---------------------------------------|--------------|
| 01/31/2022                       | 001                   | A                       | BOD, 5-day, percent remo  | MO AV MN                          | %                              | 85             | =                                     | 74.5         |
| 01/31/2022                       | 001                   | A                       | Solids, suspended percent | MO AV MN                          | %                              | 85             | =                                     | 83.2         |