

**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	1/19/2018		
Media:	Water		
Regulatory Program(s)	CWA – NPDES		
Company Name:	Rio de Arenas Mobile Home Park, LLC		
Facility Name:	Rio de Arenas Wastewater Treatment Plant		
Facility Physical Location:			
(city, state, zip code)	Arenas Valley, NM 88061		
Mailing address:	3647 N Suwanee Pt		
(city, state, zip code)	Crystal River, FL 34428		
County/Parish:	Grant County		
Facility Contact:	Virginia Simmens	Owner	
	gsimmens@hotmail.com		
FRS Number:	110011027343		
Identification/Permit Number:	NM0027375		
Media Number:			
NAICS:			
SIC:	6515		
Personnel participating in inspection:			
Amy Andrews	US EPA, 6EN-WM	Inspector	(214) 907-0638
Jennifer Foote	NMED	Inspector	(505) 827-0596
Manny Orosco	Rio de Arenas Wastewater Treatment Plant	Operator	(575) 590-0148
EPA Lead Inspector Signature/Date			
	Amy Andrews		Date
Supervisor Signature/Date			
	Carol Peters		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (EPA) Region 6 inspector, Amy Andrews, and New Mexico Environment Department (NMED) inspector Jennifer Foote arrived at the Rio de Arenas Wastewater Treatment Plant (WWTP) at 9:30 am on January 19, 2018 for an unannounced Compliance Evaluation Inspection (CEI). We met with Manny Orosco, WWTP Operator, for the Opening Conference. I presented my credentials to Mr. Orosco, and informed him that this was an EPA inspection to determine the WWTP's compliance under the Clean Water Act (CWA). This CEI was conducted under the authority 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 Rio de Arenas WWTP representatives, observations made by the EPA and NMED inspectors, and records and reports maintained by the permittee (Rio de Arenas WWTP), and the EPA.

FACILITY DESCRIPTION

The Rio de Arenas WWTP is classified as a minor, non-municipal discharger with a capacity of 0.04 million gallons per day (MGD). Discharge is into the Rio de Arenas, an intermittent stream, located at Latitude 32°46'25"N and Longitude 108°11'29" W, and thence to San Vicente Arroyo, a naturally ephemeral stream in the Mimbres River Closed Basin (it is possible that as a closed basin, it is not regulated as a waters of the United States). The facility is an activated sludge package plant with chlorine disinfection and one operator (Mr. Orosco). Influent enters the plant via gravity flow into a beehive shaped brick structure, flows through a downward sloped concrete structure with a bar screen, then into an aerated equalization tank to accommodate fluctuating flows. From the equalization tank, wastewater enters an aeration basin, then clarifier basins for settling. A sludge digester unit located between the aeration basin and the equalization tank receives waste activated sludge (WAS) from the clarifiers. Return activated sludge (RAS) flows back from the clarifiers to the equalization basin where it mixes with influent before going to the aeration basin. After the clarifiers, flow enters an open basin or trough, then a chlorine contact chamber with serpentine baffle design. Calcium hypochlorite tablets are manually placed into the open trough below the clarifiers' effluent weir. An outlet pipe at the bottom of the chlorine contact chamber allows effluent to exit the package plant. Effluent is then piped to Outfall 001. Before reaching the outfall, the effluent flow is metered and then flows into a sodium sulfite de-chlorination tablet unit.

Section II - OBSERVATIONS

At the time of the inspection, an Administrative Order had recently been issued for failure to submit monthly Discharge Monitoring Reports (DMRs) for the months of October, November and December 2014 and January through September 2017. Mr. Orosco was able to produce the DMRs for October, November and December 2017 at the inspection. Mr. Orosco also stated that he has been doing the sampling consistently for at least the last six years, so the data exists, but has not been responsible for submitting the DMRs himself, and isn't sure of their status.

Mr. Orosco reported that ownership of the facility has once again changed hands. CCI Investments had acquired the Rio de Arenas Mobile Home Park in the beginning of 2016 (or thereabouts). However, CCI Investments walked away from the site in November 2017 and handed the site back to the original owner (Virginia Simmens).

Section III – AREAS OF CONCERN

Requirement 1:

NPDES Permit NM0027375, Part I.C. *Monitoring results must be reported to EPA on either the electronic or paper Discharge Monitoring Report (DMR) approved formats. ... the permittee is required to make regular monthly reports as described above and shall submit those reports no later than the 28th day of the month following the months: December, March, June and September.*

Concern 1:

Missing DMRs for January through September 2017. No sampling data was provided during the inspection.

Requirement 2:

NPDES Permit NM0027375, Part III.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.*

Concern 2A:

Upon arrival at the facility, the wastewater treatment plant was non-operational because the power had gone out. Mr. Orosco was replacing the fuses in the fuse box (see Photos 2-4 in Appendix 1). He stated that he didn't know how long the power had been out but that was not the first time the power had gone out and the "classic" fuses are difficult to find in stores and hazardous to replace.

Concern 2B:

There were solids floating in the clarifier (see Photo 5 in Appendix 1). It was unclear if this was a result of short circuiting in the system due to the aforementioned power failure, or a more serious problem with the operation of the plant itself.

Concern 2C:

Piping at the facility had been used to prop up other piping (see Photo 6 in Appendix 1), rather than using appropriate strapping. Mr. Orosco stated that there was a lack of funding for the items needed to do the maintenance properly.

Section IV – FOLLOW UP

No information was received by EPA after exiting the Facility on January 19, 2018.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 6 photos taken 1/19/2018

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Rio de Arenas Wastewater Treatment Plant		
City: Arenas Valley	County/Parish: Grant County	State: New Mexico



Photo File Name: DSCN0363.jpg

Date of Photo: 1/19/2018

Time of Photo: 10:08 AM

Photographer: Amy Andrews

Description: View of the wastewater treatment plant, with the chlorine contact chamber at the bottom of the photo.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Rio de Arenas Wastewater Treatment Plant		
City: Arenas Valley	County/Parish: Grant County	State: New Mexico



Photo File Name: DSCN0342.jpg

Date of Photo: 1/19/2018

Time of Photo: 9:48 AM

Photographer: Amy Andrews

Description: Inside of the electrical control panel, showing the "classic" fuses.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Rio de Arenas Wastewater Treatment Plant		
City: Arenas Valley	County/Parish: Grant County	State: New Mexico



Photo File Name: DSCN0358.jpg

Date of Photo: 1/19/2018

Time of Photo: 9:55 AM

Photographer: Amy Andrews

Description: Closeup view of a second electrical control panel with similar "classic" fuses.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Rio de Arenas Wastewater Treatment Plant		
City: Arenas Valley	County/Parish: Grant County	State: New Mexico



Photo File Name: DSCN0359.jpg

Date of Photo: 1/19/2018

Time of Photo: 9:55 AM

Photographer: Amy Andrews

Description: View of the second electrical control panel, inside of a maintenance closet.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Rio de Arenas Wastewater Treatment Plant		
City: Arenas Valley	County/Parish: Grant County	State: New Mexico



Photo File Name: DSCN0355.jpg

Date of Photo: 1/19/2018

Time of Photo: 9:54 AM

Photographer: Amy Andrews

Description: View of the clarifier with solids present.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Rio de Arenas Wastewater Treatment Plant		
City: Arenas Valley	County/Parish: Grant County	State: New Mexico



Photo File Name: DSCN0352.jpg

Date of Photo: 1/19/2018

Time of Photo: 9:53 AM

Photographer: Amy Andrews

Description: View of piping propped up with other piping.