INSPECTION REPORT

Inspection Entry Date/Time	03/01/2023 01:00 PM (MT)	Announced: No
Inspection Exit Date/Time	03/01/2023 03:20 PM (MT)	Access: Granted
Weather		
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, WWTP	
Type of Inspection	CEI - Compliance Evaluation Inspection	
Permittee Name	Camino Real Regional Utility Authority (CRRUA)	
Facility or Site Name	North Wastewater Treatment Plant	
Facility/Site Physical Address	5500 Mcnutt Road	
City, State, Zip Code	Sunland, NM 88008	
County/Borough/Parish		
Facility GPS Coordinates	31.85133, -106.62941	
Mailing Address (If different)		
City, State, Zip Code		
FRS ID	110067602981	
Permit Number(s) (If Applicable)	NM0031178	
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	[Signature] 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: 2023.04.27 09:21:44 -06'00'		[Date] 04/27/2023
	EPA Region 6	andrews.amy@epa.gov	(214) 907-0638

Supervisor Review:

Roberto Bernier	[Signature] ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2023.04.27 12:16:49 -05'00'		[Date]
	EPA Region 6	bernier.roberto@epa.gov	

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

EPA Region 6 Lead Inspector, Amy Andrews, arrived at the Camino Real Regional Utility Authority (CRRUA) North Wastewater Treatment Plant (WWTP; the "Site" or "Facility"), located at 5500 McNutt Road, Sunland, NM 88008, at 01:00 PM (MT) on 03/01/2023 for an unannounced inspection. EPA Region 6 Lead Inspector presented credentials to Mr. Rangel and Mr. 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 CRRUA 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 CRRUA 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 CRRUA 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.

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
Bridel Facility Operations	Raul Rangel	Operator	Yes	No

Facility/Site Description

EPA Region 6 lead inspector confirmed the following facility information:

The CRRUA North WWTP is classified as a major industrial discharger under the CWA, Section 402, of the NPDES permit program and is authorized to discharge up to 1.0 million gallons per day (MGD) based on design flow, with an actual average discharge around 0.82 MGD, serving a population of approximately 8000 people. Discharge is to receiving waters of the Rio Grande River 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.

This is a new extended aeration facility that came online in February 2019, it is installed geographically next-door to the old Santa Theresa WWTP. The old plant had been offline for a number of years; none of the old equipment was rehabilitated to be part of this WWTP. The 1.0 MGD plant that is currently in operation is Phase 1 of a three-phase plan to increase the total capacity of the plant to 3.0 MGD total. Each phase is planned to be a copy of the existing plant.

Facility/Site Information

Responsible official	Brent Westmoreland, Executive Director
WWTP Design Capacity & Average Daily Flow	Design capacity 1.0 MGD, with Average actual flow of 0.82 MGD
Contributing (or shared) Jurisdictions	Shared jurisdiction with the southern Sunland Park WWTP and the West Mesa WWTP. The West Mesa WWTP is primarily industrial users.
Outfalls: (and do the numbers, locations, and receiving waters match the permit?)	001, yes
Operation schedule (days of operation, # shifts/day, # operators/shift, coverage overnight, weekends & emergencies), and is staffing sufficient for proper operation?	Monday through Friday from 7am to 3pm, with on-call staff available overnight and on weekends
Do you use in-house or contract out for laboratory analyses? (including for metals or WET testing?)	Biochemical oxygen demand (BOD), total suspended solids (TSS), and Escherichia coli (E. coli) are sent to Professional Water Testing in Las Cruces. Arsenic and boron are sent to Hall Environmental in Albuquerque. WET testing is sent to BioAquatics in Carrollton, TX.
Is there currently any portion of the treatment train that is non-operational?	no
Are there any plans for renovation or additional equipment to allow for increased wastewater flow?	A 3.0 MGD lift station is planned for installation just north of the North WWTP. It's not clear yet which WWTPs will receive the flow.

Location(s)

Location/Area/Sub-area	Description
1 - Collection System	The collection system feeds wastewater to the Viewpoint lift station, which is located in the southern corner of the North WWTP property.
2 - Treatment System	The plant headworks contains an automatic Duperon bar screen, automatic auger with compacter and a grit chamber. Removed grit goes into a roll-off bin and then to the Coralitos Landfill. The treatment is a dual-train Aero-mod package plant where influent first goes to selector tank where it is mixed with return activated sludge (RAS) before being sent to one of the two first stage aeration/anoxic basins followed by a second stage aeration/anoxic basin and then to a "ClarAtor" clarifier which is able to switch between settling and decant. Three blowers feed both trains of Aero-mod basins, and all are located inside of sound-proof boxes for noise mitigation. Each train also has its own digester.
3 - Disinfection, Flow Meters & Outfall	Disinfection is by an Aquaray 40 HO ultraviolet (UV) disinfection system, then through a Parshall Flume to a wet well. Effluent is pumped from the wet well to the outfall at the Rio Grande River
4 - Biosolids/Sludge	Solids from the digesters go to a belt press for drying. The dewatered sludge is transported to Corralitos Landfill, owned and operated by South Central Solid Waste Authority.

5 - Sampling & Laboratory	In-house analysis includes pH and process control samples such as dissolved oxygen. 6-hour composite samples are collected for BOD and TSS, which are sent to an external laboratory.

SECTION II – OBSERVATIONS

Location: 1 - Collection System

Observation #: AA2-OB-002 **Date:** 04/24/2023 **Weather:**

Sanitary sewer overflows (SSOs) tend to happen during rainfall events. CRRUA has plans to completely replace the main collection line north of this WWTP. Mr. Lopez says that he reports the SSOs to EPA himself, both to Ms. Nancy Williams and Ms. Mona Tates.

Location: 2 - Treatment System

Observation #: AA2-OB-001 **Date:** 04/24/2023 **Weather:**

The CRRUA North WWTP lost power on Sunday for about 4 hours (maybe more). All lift stations went down too, so there was no influent flow to the plant. Generators kept plant running. Mr. Rangel responded because he had also lost power at his residence.

The SCADA system has been having issues with call-out where it was sending ghost alarms. Therefore, the whole call-out system was shut down. Facility personnel report that they are switching from Century Link Verbatim system to a Verizon system, and it is in the process of being set up right now. Not having a SCADA alarm call-out creates that possibility of a major plant issue going unnoticed for a significant amount of time.

Photo(s)

1. DSCN1777.JPG

Observation #: AA2-OB-003 **Date:** 04/25/2023 **Weather:**

A lagoon and clarifier that are still present from the previous Santa Teresa WWTP (which was located adjacent to the current North WWTP) are currently being used as overflow capacity for the North WWTP. Overflow wastewater is sent to the lagoon and clarifier directly from the Viewpoint lift station. The lagoon and clarifier are not hard-piped to the North WWTP, CRRUA hires Rain-for-Rent to bring equipment and lay temporary lines to pump stored wastewater to the North WWTP sump, which then pumps all water collected back to the headworks.

There have been major air-line repairs to the blower pipes under the wastewater surface - replacing PVC with stainless steel.

Photo(s)

1. DSCN1767.JPG
2. DSCN1768.JPG

Location: 3 - Disinfection, Flow Meters & Outfall

Observation #: AA2-OB-004 **Date:** 04/26/2023 **Weather:**

The Parshall Flume has algae growing in the bottom of it, which may make the water level measurement invalid.

Facility personnel stated that there is no monthly verification of the effluent Parshall Flume meter against the ultrasonic flow meter.

Facility personnel were not able to show documented evidence of annual flow meter calibration.

Observation #: AA2-OB-007 **Date:** 04/26/2023 **Weather:**

The UV system was installed in 2018, but facility personnel report that the system has been a "nightmare" since then. High water has been damaging the UV ballasts. Recently the whole UV system was raised up out of the effluent water level approximately 8-inches, which they hope will solve the problem.

Photo(s)

1. DSCN1787.JPG

Location: 4 - Biosolids/Sludge

Observation #: AA2-OB-006 **Date:** 04/26/2023 **Weather:**

There has been no annual sludge DMR reporting.

Location: 5 - Sampling & Laboratory

Observation #: AA2-OB-005 **Date:** 04/26/2023 **Weather:**

BOD and TSS are sampled every Wednesday from 10am to 3pm via autosampler. Both autosamplers were cold with thermometers present. Facility personnel stated that they do not flow weight the samples, and there is no documentation was provided showing the times the portions were collected.

pH buffers are missing opened-on date and revised expiration date based on the opened date, which may have indicated that buffers were expired. It was therefore impossible to confirm proper calibration of the pH instrument.

Photo(s)

1. DSCN1784.JPG

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

Record: DMR Reports		**AOC:** Yes
Ref #: AA2-RR-001	**Reviewed By:** Amy Andrews	**Reviewed Date:** 04/26/2023

InspectionReport_CWADMR 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 3/31/2023.

A single effluent limit excursion of BOD was noted during the month of October 2022.

A single effluent limit excursion TSS was noted during the month of December 2022.

Effluent limit excursions of E. coli have been recorded for the months of August 2022, September 2022, October 2022, and December 2022.

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-004	**Location: 3 - Disinfection, Flow Meters & Outfall**

Regulation and/or Permit Requirement

- NM0031178 III.C.6.

- III.C.6. - MONITORING AND RECORDS; FLOW MEASUREMENTS Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be sele...

AOC:

The Parshall Flume has algae growing in the bottom of it, which may make the water level measurement invalid.

Facility personnel stated that there is no monthly verification of the effluent Parshall Flume meter against the ultrasonic flow meter.

Facility personnel were not able to show documented evidence of annual flow meter calibration.

Additional Notes:

AOC Reference #: AA2-OB-005	Location: 5 - Sampling & Laboratory

Regulation and/or Permit Requirement

NM0031178 III.F.22.e

- III.F.22.e - DEFINITIONS; MUNICIPAL TERMS; 6-HOUR COMPOSITE SAMPLE consists of six effluent portions collected no closer together than one hour (with the first por...

AOC:

Facility personnel stated that they do not flow weight the samples, and there is no documentation was provided showing the times the portions were collected.

Additional Notes:

AOC Reference #: AA2-OB-005	Location: 5 - Sampling & Laboratory

Regulation and/or Permit Requirement

- NM0031178 III.C.5.b.

- III.C.5.b. - MONITORING AND RECORDS; MONITORING PROCEDURES The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instru...

AOC:

pH buffers are missing opened-on date and revised expiration date based on the opened date, which may have indicated that buffers were expired. It was therefore impossible to confirm proper calibration of the pH instrument.

Additional Notes:

AOC Reference #: AA2-OB-006	Location: 4 - Biosolids/Sludge

Regulation and/or Permit Requirement

NM0031178 IV. Element 3.9

- IV. Element 3.9 - MUNICIPAL SOLID WASTE LANDFILL DISPOSAL
  Reporting requirements - The permittee shall report annually on the Discharge Monitoring Report the following information:
  a. Results of the Toxicity Characteristic Leaching Procedure Test conducted on the sludge to be disposed (Pass/Fail).
  b. Annual sludge production in dry metric tons/year.
  c. Amount of sludge disposed in a municipal solid waste landfill in dry metric tons/year.
  d. Amount of sludge transported interstate in dry metric tons/year.
  e. A certification that sewage sludge meets the requirement in 40 CFR 258 concerning the quality of the sludge disposed in a municipal solid waste landfill unit shall be attached to the DMR.

AOC:

There has been no annual sludge DMR reporting.

Additional Notes:

AOC Reference #: AA2-RR-001	Records Review: DMR Reports
Regulation and/or Permit Requirement • NM0031178 I.a.1	
• I.a.1 - LIMITATIONS AND MONITORING REQUIREMENTS Effluent Limits	
AOC: A single effluent limit excursion of BOD was noted during the month of October 2022. A single effluent limit excursion TSS was noted during the month of December 2022. Effluent limit excursions of E. coli have been recorded for the months of August 2022, September 2022, October 2022, and December 2022.	
Additional Notes:	

AOC Reference #: AA2-OB-001	Location: 2 - Treatment System
Regulation and/or Permit Requirement • NM0031178 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: The SCADA system has been having issues with call-out where it was sending ghost alarms. Therefore, the whole call-out system was shut down. Facility personnel report that they are switching from Century Link Verbatim system to a Verizon system, and it is in the process of being set up right now. Not having a SCADA alarm call-out creates that possibility of a major plant issue going unnoticed for a significant amount of time.	
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 03:20 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 Excursions

APPENDIX 1: PHOTO LOG

Photo 1	DSCN1767.JPG	
03/01/2023 02:49 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
View of lagoon left over from the old Santa Teresa WWTP that is currently used for holding excess flow prior to being pumped to the headworks of the North WWTP.		

Photo 2	DSCN1768.JPG	
03/01/2023 02:50 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
View of clarifier left over from the old Santa Teresa WWTP that is currently used for holding excess flow prior to being pumped to the headworks of the North WWTP.		

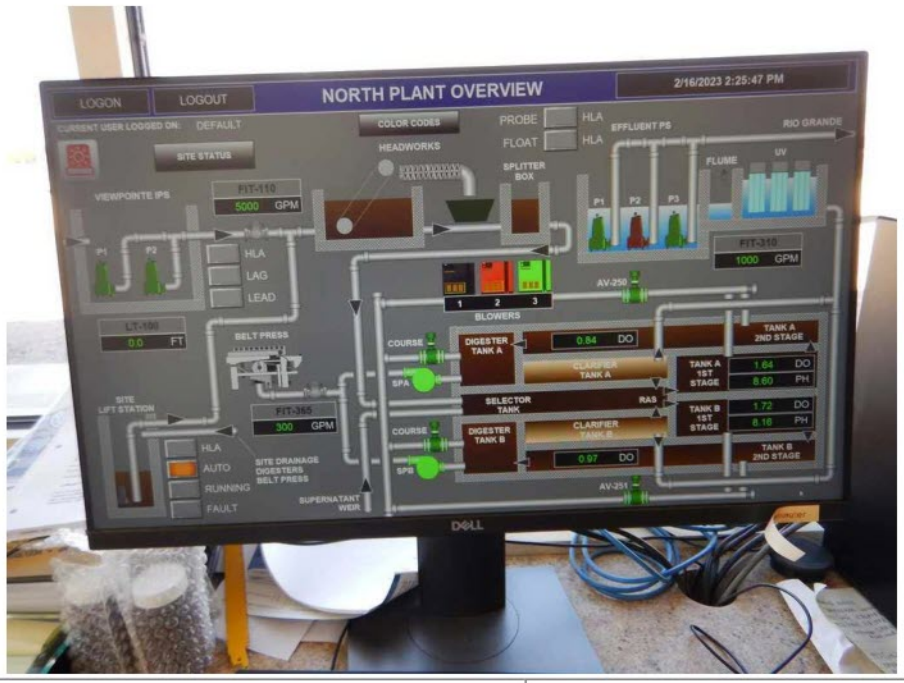

Photo 3	DSCN1777.JPG	
03/01/2023 03:02 PM	Photographer: Amy Andrews	
2 - Treatment System	No CBI	No PII
Plant overview showing on SCADA system		

Photo 4	DSCN1784.JPG	
03/01/2023 03:14 PM	Photographer: Amy Andrews	
5 - Sampling & Laboratory	No CBI	No PII
pH buffers missing opened-on and revised expiration dates		

Photo 5	DSCN1787.JPG	
03/01/2023 03:45 PM	Photographer: Amy Andrews	
3 - Disinfection, Flow Meters & Outfall	No CBI	No PII
View of Outfall 001.		

APPENDIX 2: EFFLUENT LIMIT EXCURSIONS

Permit NM0031178 - Query Dates 3/1/2022 to 3/31/2023

Permit Name	Major Minor Status	Issue Date	Effective Date	Expiration Date
CAMINO REAL REGIONAL UTILITY AUTHORITY	Major	11/30/2018	12/30/2018	12/29/2023

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
1/1/2019	12/29/2023	6 Hour Composite	Weekly

Limit		
Limit Unit Desc	Pounds per Day	Milligrams per Liter
Statistical Base	7 DA AVG	7 DA AVG
Limit Value	376.	45.
DMR Values		
10/31/22	483.39	77.8

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

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
1/1/2019	12/29/2023	6 Hour Composite	Weekly

Limit	
Limit Unit Desc	Milligrams per Liter
Statistical Base	7 DA AVG
Limit Value	45.
DMR Values	
12/31/22	45.5

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

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
1/1/2019	12/29/2023	Grab	Weekly

Limit		
Limit Unit Desc	Billion Colony Forming Units per Day	Colony Forming Units per 100ml
Statistical Base	30DAVGEO	DAILY MX
Limit Value	2.53	410.
DMR Values		
8/31/22		9600
9/30/22	3.58	1537
10/31/22		20000
12/31/22		16909