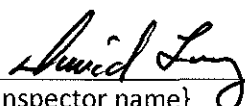
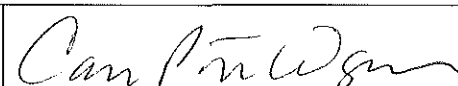


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	April 25, 2017		
Media:	Water		
Regulatory Program(s)	CWA 308[A][B]		
Company Name:	Jicarilla Apache Utility Authority		
Facility Name:	Dulce Wastewater Treatment Plant		
Facility Physical Location:	290 Narrow Gauge Road		
(city, state, zip code)	Dulce, New Mexico 87528		
Mailing address:	P.O. Box 507		
(city, state, zip code)	Dulce, New Mexico 87528-0507		
County/Parish:	Rio Arriba		
Facility Contact:	Jesse Frogge	Project Manager – Utility Partners	
	jfrogge@utilitypartnersllc.com		
FRS Number:	110013676290		
Identification/Permit Number:	NM0030520		
Media Number:	NA		
NAICS:	221320		
SIC:	4952		
Personnel participating in inspection:			
David Long	USEPA/6EN-WM	Environmental Scientist	214.665.7323
Amy Andrews	USEPA/6EN-WM	Environmental Engineer	214.907.0638
Brenda Schiller	Utility Partners	Lab Tech/Operator	575.759.1866
Ron Clark	Applied Products Group	President	602.793.6545
Steven Waupekenay	Jicarilla Apache Village Authority	Assistant Director	505.330.2214
EPA Lead Inspector Signature/Date			12/13/2017
	{Inspector name}		Date
Supervisor Signature/Date			12/13/17
	{Supervisor name}		Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

A U.S. Environmental Protection Agency (USEPA) compliance evaluation inspection was performed at the City of Dulce Wastewater Treatment Plant located at 290 Narrow Gauge Road, Dulce, New Mexico on April 25, 2017. The inspection was conducted under the guidelines established by the USEPA under the National Pollutant Discharge Elimination System (NPDES) for wastewater treatment systems. This targeted site visit was performed as a part of the USEPA Region 6's annual ACS inspection commitment and its' purpose was to inspect and review current operations as compared to their NPDES permit requirements. An entry briefing was conducted by EPA-Region 6 inspectors David Long and Amy Andrews at 9:00 a.m. and the inspector met with Jesse Frogge, Project Manager, and Brenda Schiller, Lab Tech/Operator, who were present for the entire inspection. Mr. Frogge and Ms. Schiller are employees of Utility Partners LLC from Gulfport, Mississippi which has been engaged to bring the facility into compliance with federal permit requirements. Ron Clark, President of Applied Products Group (Contractor for Utility Partners) and Steven Waupenkenay, Assistant Director for the Jicarilla Apache Village Authority, were also present for the entry briefing, but did not remain for the rest of the inspection. During the entry briefing, the EPA inspectors provided credentials and explained the purpose of the inspection.

FACILITY DESCRIPTION

The facility is owned by the Jicarilla Apache Nation and operates under NPDES permit NM0030520 (effective August 1, 2014). The Dulce WWTP is a minor municipal discharger with a design flow of 0.6 million gallons a day (MGD) and average daily flow of 0.250 MGD. The discharge from the WWTP is to Amargo Creek and eventually to the San Juan River Basin. The Dulce facility is in operation 24 hours each day and seven days per week with operators on site from 8:00 a.m. to 5:00 p.m. Monday through Friday. One operator is on-call for evenings and weekends, however the facility lacks a Supervisory Control and Data Acquisition (SCADA) system to provide 24/7 monitoring of plant operations.

Treatment units at the facility include a lift station which feeds the influent to headworks which includes grit removal and a solids spiral removal system. From the headworks, flow is split and sent to Sequencing Batch Reactors (SBR) #1 and #2. From the SBR units, flow is sent to either Digester #1 or Digester #2. Solids from the digesters are sent to a belt press for drying before disposal at the City of Farmington Landfill. Decant effluent from the digesters is sent to a box filter for final solids removal prior to disinfection by a UV system. Final discharge flow rate is monitored by an American Sigma flow meter. The facility also maintains a nine inch Parshall flume as a primary flow measurement device.

During the entry briefing, the EPA inspectors were informed by Mr. Frogge that Utility Partners had just taken over the operation of the plant and that none of the issues noted in their June 2016 EPA inspection had been properly addressed by the Jicarilla Apache Tribe in the past year. Area of concern noted in the June 2016 inspection include:

1. Facility has not submitted Discharge Monitoring Reports since 2014 and could not provide any laboratory data to indicate that samples had been collected and analyzed
2. An unacceptable number of treatment units were not in operating condition at the time of inspection including their influent grit pump, sludge belt press, and solids filtration/removal system. Due to the lack of proper solids removal and wasting, a layer of sludge was noted at the facility's outfall
3. The facility is not performing regular calibrations on their analytical equipment including the dissolved oxygen meter adjacent to SBR Basin #2 and discharge flow meter in the treatment plant, and the thermometers and balance in their laboratory
4. Good housekeeping at the facility is lacking as noted by the presence of dried solids on the ground adjacent to both the lift station, SBR Basins and sludge press. Additionally, during the inspection it was noted that wash water was being discharged to the storm sewer system and allowed to flow offsite. Finally, the security fence surrounding the facility was breached and had not been repaired
5. Facility personnel have failed to develop and/or implement quality assurance/quality control programs for spill response, laboratory operations, calibration of facility equipment, and maintenance of treatment units
6. Treatment plant has operators present less than 12 hours per day, but lacks any sort of afterhours monitoring system and/or callout system
7. In addition to their failure to annually calibrate their discharge flow meter, facility has not maintained their primary flow measurement device (keeping staff gauge clean and readable) to allow for periodic comparisons between their mechanical and electronic flow measurement devices.
8. Procedures used to perform Total Suspended Solids and pH are not in compliance with Standard Methods
9. Facility could not provide a copy of their current permit and had posted in their laboratory the analytical requirements from their previous permit
10. While facility has not wasted any sludge from their system for, at least, the past two years, the facility could not provide a sludge DMR for any of the years in which sludge was generated and disposed

Section II - OBSERVATIONS

Following the entry briefing, a site tour was performed to observe the operational condition of the plant. The site tour showed that none of this facility's treatment units or operational issues noted in the previous year's inspection had been addressed. Flow to the facility's outfall was greatly reduced, however, observed flow had a slight yellow appearance and the area surrounding the outfall and beyond was covered with a layer of sludge indicating severe bulking within the treatment system due to the inoperative belt press and lack of solids wasting.

Following the site tour, facility paperwork used to generate DMR data would normally be reviewed for both precision and accuracy, but this facility has not submitted any DMRs since 2014 and no sample records, laboratory results, nor DMR calculation spreadsheets were available for review. Ms. Schiller indicated that since their arrival on site, samples were being regularly collected and submitted to the laboratory located in the wastewater treatment plant in Farmington, New Mexico, but no results had been returned to allow for review. DMRs would be submitted on a timely basis once results were

available. Ms. Schiller also indicated that all laboratory equipment would be replaced or brought up to approved operational condition to allow the onsite lab to begin performing their permit required analyses.

Section III – AREAS OF CONCERN

At the conclusion of the inspection, the EPA inspectors met with Mr. Frogge and Ms. Schiller. At that time, the inspectors provided details of the inspection and reviewed issues noted in the inspection that would require additional follow-up or correction. All issues noted in the Facility Description still need to be addressed. However, it was agreed to allow Utility Partners an opportunity to bring the facility into compliance with their wastewater permit. An itemized list of repairs and upgrades was provided to the EPA inspectors and Mr. Frogge agreed to provide periodic updates on the facility's operational status.

The inspectors exited the site at 11:45 a.m.

Section IV – FOLLOW UP

Mr. Frogge is to provide an update on treatment plants operational status and repairs.

Section V – LIST OF APPENDICES

Appendix 1 – Facility Submitted Documents

Appendix 1 – Facility Submitted Documents

3-7-17

WASTEWATER TREATMENT PLANT COST BREAKDOWN

ITEMS	VENDOR	QUANTITY	ITEMIZED COST	TOTAL COST
1 Headworks Improvements				
Materials	AATT	1	\$ 16,707.00	\$ 16,707.00
Labor		1	\$ 16,322.00	\$ 16,322.00
Supervision and Oversight	CWE	1	\$ 4,400.00	\$ 4,400.00
Total Job Cost				\$ 37,429.00
2 SCADA				\$ -
Data Gathering	CWE	1	\$ 3,000.00	\$ 3,000.00
Data Gathering	APG	1	\$ 11,000.00	\$ 11,000.00
New SCADA System	?	1	\$ 332,000.00	\$ 332,000.00
Supervision and Oversight	CWE	1	\$ 4,000.00	\$ 4,000.00
Total Job Cost				\$ 350,000.00
3 Diffusers				\$ -
Materials (Retro + 2 New)		1	\$ 89,312.48	\$ 89,312.48
Labor	UP, LLC	1	\$ 19,860.00	\$ 19,860.00 ✓
Supervision and Oversight	CWE	1	\$ 4,500.00	\$ 4,500.00
Total Job Cost				\$ 113,672.48
4 Mag Meter/Effluent Flow Meter				
Materials	APG	1	\$ 6,899.81	\$ 6,899.81
Labor	AATT	1	\$ 2,038.00	\$ 2,038.00
Supervision and Oversight	CWE	1	\$ 3,100.00	\$ 3,100.00
Total Job Cost				\$ 12,037.81
5 Filter Building				
Materials	Aqua	1	\$ 6,068.66	\$ 6,068.66
Labor	UP, LLC	1	\$ 6,600.00	\$ 6,600.00 ✓
New UV System	APG	1	\$ 90,000.00	\$ 90,000.00 ?
Supervision and Oversight	CWE	1	\$ 5,000.00	\$ 5,000.00
Total Job Cost				\$ 107,668.66
6 Level Controls				
Materials	APG	1	\$ 8,273.26	\$ 8,273.26
Labor	APG	1	\$ 3,012.47	\$ 3,012.47
Supervision and Oversight	CWE	1	\$ 3,500.00	\$ 3,500.00
Total Job Cost				\$ 14,785.73
7 Automatic Valves				
Materials	?	1	\$ 15,000.00	\$ 15,000.00
Labor		1	\$ 2,000.00	\$ 2,000.00
Supervision and Oversight	CWE	1	\$ 3,000.00	\$ 3,000.00
Total Job Cost				\$ 20,000.00

755
DO meter
probed

Long, David

From: Jesse Frogge <jfrogge@utilitypartnersllc.com>
Sent: Thursday, August 10, 2017 5:08 PM
To: Long, David
Subject: Dulce WWTP updates
Attachments: April DMR 2017.pdf; May DMR 2017.pdf; June DMR 2017.pdf; July DMR 2017.pdf; pH worksheet.pdf

Mr. Long

The following is an update to the repairs and operational issues at Dulce WWTP.

1. The facility started sampling and analyzing the effluent using the requirements in the current NPDES permit. (issued 2014) A Copy of the current permit is posted in the lab and offices. The samples were taken to an outside lab, while we corrected the issues with the onsite lab. We are working on establishing the signatory for the Net DMR program. In the past three months, the director of utilities for the nation has changed four times. I have attached DMRs that we have done manually. The DMRs were figured on an estimated flow due to meter inconsistencies. The DMRs shows the operational improvements since your April visit.
2. The following is a list of the new equipment that has been installed and is operational as of today:

- New decant valves (May 2017)
- New air diffuser in all basins (May 2017)
- Three new blowers (June 2017)
- New filter media cloth (May 2017)
- New Effluent flow meter (July 2017)
- New Influent flow meter (July 2017)
- New BOD incubator (Aug 2017)
- New belt press for solids removal
- New UV control system and bulbs (June 2017)

3. The following is a list of the approved projects that are scheduled but not completed:

- Headworks repairs including the grit removal system, water lines for cleanup, bypass rack gates, and ventilation system. Completion estimated by 9/30/17
- Replacement of the SBR mixers and decanter floats. Completion estimated by 10/31/17
- SCADA and Alarm system. The evaluation of the existing system has been completed. The design phase for the new hardware and software is going on now. Completion of the installation is estimated in 90 days.
- Main lift station piping replacement. Completion estimated by 9/30/17
- New DO meter and probes. Completion by 9/30/17
- New automatic samplers for the influent and effluent. Completion estimated by 10/31/17

- 4 The lab equipment has been calibrated and certified by QA Balance out of Colorado. NIST traceable thermometers have been installed in all temperature sensitive lab equipment. The onsite testing has been running side by side with the outside lab with very good results. The onsite lab has developed an QA/QC process that includes, testing a known standard for pH once a week, testing a known standard for TSS twice a month, testing a known standard for BOD with every set. Duplicates are ran on TSS and BOD every time. We are developing written SOPs for the lab. The balance is checked weekly with Class A weights and recorded in a bound book. The lab equipment temperatures are recorded daily. New reagents are logged in a bound book with the date received, date opened, expiration date, and lot numbers. New lab work sheets have been developed, which includes the Standard Method edition and the method number to be used. (see attached example).
- 5 A computerized maintenance management system is being developed now and will be directly linked to the new SCADA system. The system will manage all scheduling of the calibrations, preventive maintenance, schedule replacements, etc. of all plant equipment. The CMMS is estimated to go online in 90 days.
6. Housekeeping is an ongoing process throughout the plant.
7. The implementation on a security fence has been slowed due to political issues. The project engineer is trying to work them out.

Jesse Frogge
Project Manager
Utility Partners LLC
Dulce NM
1-575-759-1866
Cell 1-575-749-0742
jfrogge@utilitypartnersllc.com

Long, David

From: Jesse Frogge <jfrogge@utilitypartnersllc.com>
Sent: Thursday, August 10, 2017 5:35 PM
To: Long, David
Subject: Dulce WWTP updates part 2

Mr. Long

I forgot to address the sludge issue.

8. The sludge that we have processed through the belt press is being stored in 30 yard roll off containers that are lined with 30 mil plastic. At this time we have two onsite. We have been working with Waste Management to update our sludge profile. They are requiring us to get NMED approval of the analytical tests and our disposal management plan. NMED has approved our analytical results. We are now waiting on the approval letter for the DMP.

Respectfully
Jesse Frogge
Project Manager
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1-575-759-1866
Cell 1-575-749-0742
jfrogge@utilitypartnersllc.com

