



REGION 6
DALLAS, TX 75270

April 8, 2025

TRANSMITTED VIA E-MAIL

Honorable David Romero
Mayor, City of Las Vegas
1700 North Grand Avenue
Las Vegas, New Mexico 87701
mayor@lasvegasm.gov

RE: Administrative Order; Docket Number: CWA-06-2025-1736
NPDES Permit Number: NM0028827

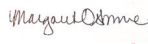
Dear Mayor Romero:

Enclosed is an Administrative Order (AO) issued to the City of Las Vegas for violations of the Clean Water Act (CWA) (33 U.S.C. § 1251 et seq.). Violations were identified during a review of the permit file, noncompliance reports, and discharge monitoring reports submitted for the Las Vegas Wastewater Treatment Facility. The violations alleged are for failure to meet permit effluent limitations and unauthorized discharges. The Environmental Protection Agency (EPA) requests that you immediately confirm receipt of this e-mail and the attached order by a response e-mail to mcelroy.damon@epa.gov.

This AO does not assess a monetary penalty; however, it does require compliance with applicable federal regulations. The first compliance deadline is within thirty (30) days of the effective date of the AO. The EPA is committed to ensuring compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) program and my staff will assist you in any way possible. Please reference AO Docket Number CWA-06-2025-1736 and NPDES Permit Number NM0028827 on your response.

If you have any questions, please contact Mr. Damon McElroy, P.E. of my staff, at (214) 665-7159 or mcelroy.damon@epa.gov.

Sincerely,


Digitally signed by
MARGARET
OSBOURNE
Date: 2025.04.08
16:02:54 -05'00'

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Enclosure

ec: shelly.lemon@env.nm.gov
susan.lucaskamat@env.nm.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

FINDINGS OF VIOLATION AND COMPLIANCE ORDER

Docket Number: CWA-06-2025-1736; NPDES Permit Number: NM0028827

STATUTORY AUTHORITY

The following findings are made, and Order issued, under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA), Section 309(a) of the Clean Water Act (the Act), 33 U.S.C. § 1319(a). The Administrator of EPA delegated the authority to issue this Order to the Regional Administrator of EPA Region 6, who delegated this authority to the Director of the Enforcement and Compliance Assurance Division.

FINDINGS

1. The City of Las Vegas (Respondent) is a "person," as that term is defined at Section 502(5) of the Act, 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2.
2. At all times relevant to this Order (all relevant times), Respondent owned or operated the Las Vegas Wastewater Treatment Facility (facility) located at 905 12th Street, Las Vegas, NM 87701, and was therefore, an "owner or operator" within the meaning of 40 C.F.R. § 122.2.
3. At all relevant times, the facility acted as a "point source" of a "discharge" of "pollutants" with its final wastewater discharge directly to the Gallinas River, Segment No. 20.6.4.220, of the Pecos River Basin which is a "water of the United States," within the meaning of Section 502 of the Act, 33 U.S.C. § 1362, and 40 C.F.R. § 122.2.
4. Because Respondent owned or operated a facility that acted as a point source of discharges of pollutants to waters of the United States, Respondent and the facility were subject to the Act and the National Pollutant Discharge Elimination System (NPDES) program.
5. Under Section 301 of the Act, 33 U.S.C. § 1311, it is unlawful for any person to discharge any pollutant from a point source to waters of the United States, except with the authorization of, and in compliance with, an NPDES permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342.
6. Section 402(a) of the Act, 33 U.S.C. § 1342(a), provides that the Administrator of EPA may issue permits under the NPDES program for the discharge of pollutants from point sources to

waters of the United States. Any such discharge is subject to the specific terms and conditions prescribed in the permit.

7. Respondent applied for and was issued NPDES Permit No. NM0028827 (permit) under Section 402 of the Act, 33 U.S.C. § 1342, with an effective date of December 1, 2022. At all relevant times, Respondent was authorized to discharge pollutants from the facility to waters of the United States only in compliance with the specific terms and conditions of the permit.

8. Part I.A of the permit (Monitoring and Reporting Requirements) requires Respondent to sample and test its effluent and monitor its compliance with permit conditions according to specific procedures, in order to determine the facility's compliance or noncompliance with the permit and applicable regulations. The permit also requires Respondent to file with EPA, certified Discharge Monitoring Reports (DMRs) of the results of monitoring, and Noncompliance Reports when appropriate.

9. The permit contains "Effluent Limitations and Monitoring Requirements" that place certain limitations on the quality and quantity of effluent discharged by Respondent. The relevant discharge limitations are specified in Attachment A, which is incorporated herein by reference.

10. NetDMRs reported in compliance with the permit, show discharges of pollutants from the facility that exceed the permitted effluent limitations established in the permit, as specified in Attachment B, which is incorporated herein by reference.

11. CWA non-compliance reports filed by the Respondent with EPA in compliance with the permit show unauthorized discharges. These discharges are specified in Attachment C.

12. Pursuant to Part III.B of the permit, Respondent is required to 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 achieve compliance with the permit conditions.

13. Pursuant to Part III.B of the permit, Respondent is prohibited from allowing a bypass except under specific circumstances.

14. Pursuant to Part III.C of the permit, Respondent is required to conduct monitoring according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified or approved.

15. On January 13, 2025, the New Mexico Environment Department on behalf of the EPA conducted a Compliance Evaluation Inspection of the facility's wastewater treatment plant, as documented in Attachment D, which is incorporated herein by reference.

16. As a result of the inspection, it was found that Parts III B and C of the permit were violated in that:

- a. Respondent failed to properly operate and maintain the wastewater treatment plant (and related appurtenances),
- b. Respondent failed to conduct sampling as required,
- c. Respondent allowed prohibited bypasses,
- d. Respondent failed to conduct monitoring and reporting according to approved test procedures.

17. On March 18, 2025, Respondent agreed to contact and coordinate with the Southwest Environmental Finance Center (SWEFC) for assistance with compliance with all permit conditions, including Effluent Limitations and Monitoring and Reporting Requirements, and for assistance with applying for available funding. Assistance is available through the SWEFC. Information on the SWEFC is available on the web-address <https://swefc.unm.edu/home/>, or by email at swefc@unm.edu, or by phone at 505-277-0644.

18. Each unauthorized discharge and each instance in which Respondent had a violation of the permit was a violation of Section 301 of the Act, 33 U.S.C. § 1311.

SECTION 309(a)(3) COMPLIANCE ORDER

Based on the foregoing Findings and pursuant to the authority of Section 309(a)(3) of the Act, 33 U.S.C. § 1319(a)(3), EPA hereby orders Respondent to take the following action:

A. Take such measures as are necessary to comply with all permit conditions, including Effluent Limitations and Monitoring and Reporting Requirements, no later than thirty (30) days from the effective date of the Order.

B. Within thirty (30) days of the effective date of this Order, Respondent shall submit a list of the specific actions taken to correct the effluent exceedances and unauthorized discharges.

C. Within thirty (30) days of the effective date of this Order, Respondent shall provide written certification to EPA Region 6 that the violations cited herein have been corrected and the facility is compliant with the requirements of the permit.

D. In the event the Respondent believes complete correction of the violations cited herein is not possible within thirty (30) days of the effective date of this Order, Respondent shall, within thirty (30) days of the effective date of this Order, submit a comprehensive written plan for the elimination of the cited violations within the shortest possible time. Such plan shall describe in detail the specific corrective actions to be taken and why such actions are sufficient to correct the violations. The plan shall include a detailed schedule for the elimination of the violations within the shortest possible time, as well as measures to prevent these or similar violations from recurring.

E. Any information or correspondence submitted by Respondent to EPA under this Order shall be submitted, via e-mail, to the following:

Mr. Damon McElroy, P.E.
mcelroy.damon@epa.gov

GENERAL PROVISIONS

Respondent may seek federal judicial review of the Order pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

Issuance of this Section 309(a)(3) Compliance Order shall not be deemed an election by EPA to waive any administrative, judicial, civil, or criminal action to seek penalties, fines, or other relief under the Act for the violations cited herein, or other violations that become known to EPA. EPA reserves the right to seek any remedy available under the law that it deems appropriate.

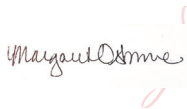
Failure to comply with this Section 309(a)(3) Compliance Order or the Act may result in further administrative action, or a civil judicial action initiated by the United States Department of Justice.

This Order does not constitute a waiver or modification of the terms or conditions of Respondents NPDES permit, which remain in full force and effect. Compliance with the terms and conditions of this Order does not relieve Respondent of its obligation to comply with any applicable federal, state, or local law or regulation.

The effective date of this Order is the date it is received by Respondent.

April 8, 2025

Date

 Digitally signed by
MARGARET OSBOURNE
Date: 2025.04.08
16:04:12 -05'00'

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Attachment A
City of Las Vegas WWTP
NPDES Permit ID No. NM0028827

Effluent Characteristic	Discharge Limitations	
Outfall: 001	Daily Avg. (30-day avg. unless noted)	Daily Max.
Aluminum	66.37 ug/l and 1.38 lbs/d	99.55 ug/l and 2.076 lbs/d
Chlorine, total residual	NA	11 ug/l
Ammonia, total	4 mg/L and 83 lbs/d	6 mg/L and 125 lbs/d
Total Suspended Solids	45 mg/L and 939 lbs/day (7-day)	NA
Dissolved Oxygen	6 mg/L	
<i>E. Coli</i>	126 cfu/100 ml	410 cfu/100 ml
pH shall be a minimum of 6.6 and a maximum of 9.0 standard units.		

Attachment B
City of Las Vegas WWTP
NPDES Permit ID No. NM0028827

Monitoring Period	Parameters	Monitoring	Units	Permit Limit	DMR Value
07/31/2023	Aluminum	30DA AVG	ug/L	66.37	96
07/31/2023	Aluminum	DAILY MX	lb/d	2.076	2.37
07/31/2023	Aluminum	DAILY MX	ug/L	99.55	150.
07/31/2023	Chlorine, total residual	INST MAX	ug/L	11	50
08/31/2023	Aluminum	30DA AVG	ug/L	66.37	82.077
08/31/2023	Aluminum	DAILY MX	ug/L	99.55	130.
08/31/2023	Chlorine, total residual	INST MAX	ug/L	11	40
08/31/2023	Nitrogen, ammonia total [as N]	DAILY MX	mg/L	6	7.8
08/31/2023	Oxygen, dissolved [DO]	MO MIN	mg/L	6	4.83
09/30/2023	Chlorine, total residual	INST MAX	ug/L	11	40
10/31/2023	Aluminum	30DA AVG	ug/L	66.37	135.33
10/31/2023	Aluminum	DAILY MX	lb/d	2.076	3.19
10/31/2023	Aluminum	DAILY MX	ug/L	99.55	260
10/31/2023	Chlorine, total residual	INST MAX	ug/L	11	30
10/31/2023	Oxygen, dissolved [DO]	MO MIN	mg/L	6	3.42
10/31/2023	pH	MINIMUM	SU	6.6	6.58
11/30/2023	Aluminum	30DA AVG	ug/L	66.37	95
11/30/2023	Aluminum	DAILY MX	ug/L	99.55	140
11/30/2023	Aluminum	INST MAX	ug/L	11	50
12/31/2023	Aluminum	30DA AVG	lb/d	1.38	2.136
12/31/2023	Aluminum	30DA AVG	ug/L	66.37	308.667
12/31/2023	Aluminum	DAILY MX	lb/d	2.076	14.598
12/31/2023	Aluminum	DAILY MX	ug/L	99.55	2300.
12/31/2023	Chlorine, total residual	INST MAX	ug/L	11	50
12/31/2023	Oxygen, dissolved [DO]	MO MIN	mg/L	6	2.16
12/31/2023	pH	MINIMUM	SU	6.6	6.45
01/31/2024	Aluminum	30DA AVG	ug/L	66.37	91.533
01/31/2024	Aluminum	DAILY MX	lb/d	2.076	2.208
01/31/2024	Aluminum	DAILY MX	ug/L	99.55	310
01/31/2024	Chlorine, total residual	INST MAX	ug/L	11	50
02/29/2024	Aluminum	30DA AVG	ug/L	66.37	70.583

Monitoring Period	Parameters	Monitoring	Units	Permit Limit	DMR Value
02/29/2024	Aluminum	DAILY MX	ug/L	99.55	150
03/31/2024	Aluminum	30DA AVG	lb/d	1.38	12.292
03/31/2024	Aluminum	30DA AVG	ug/L	66.37	1456.75
03/31/2024	Aluminum	DAILY MX	lb/d	2.076	118.511
03/31/2024	Aluminum	DAILY MX	ug/L	99.55	14000.
03/31/2024	Aluminum	MO MIN	mg/L	6	5.9
03/31/2024	pH	MINIMUM	SU	6.6	6.3
04/30/2024	Aluminum	DAILY MX	ug/L	99.55	120
04/30/2024	pH	MINIMUM	SU	6.6	6.37
05/31/2024	Aluminum	30DA AVG	ug/L	66.37	88.69
05/31/2024	Aluminum	DAILY MX	lb/d	2.076	2.491
05/31/2024	Aluminum	DAILY MX	ug/L	99.55	290
05/31/2024	Oxygen, dissolved [DO]	MO MIN	mg/L	6	5.86
05/31/2024	Solids, total suspended	7 DA AVG	mg/L	45	59.2
06/30/2024	Aluminum	30DA AVG	lb/d	1.38	3.95
06/30/2024	Aluminum	30DA AVG	ug/L	66.37	335.5
06/30/2024	Aluminum	DAILY MX	lb/d	2.076	33.643
06/30/2024	Aluminum	DAILY MX	ug/L	99.55	2900.
06/30/2024	Chlorine, total residual	INST MAX	ug/L	11	30
06/30/2024	Oxygen, dissolved [DO]	MO MIN	mg/L	6	1.66
06/30/2024	pH	MINIMUM	SU	6.6	6.51
06/30/2024	Solids, total suspended	7 DA AVG	lb/d	939.	1672.4
06/30/2024	Solids, total suspended	7 DA AVG	mg/L	45	73
10/31/2024	Chlorine, total residual	INST MAX	ug/L	11	60
11/30/2024	Chlorine, total residual	INST MAX	ug/L	11	20
12/31/2024	Chlorine, total residual	INST MAX	ug/L	11	280
12/31/2024	Oxygen, dissolved [DO]	MO MIN	mg/L	6	3.5
01/31/2025	E. coli	DAILY MX	CFU/100mL	410	2400
01/31/2025	Solids, total suspended	7 DA AVG	mg/L	45	53.3

Attachment C
City of Las Vegas WWTP
NPDES Permit ID No. NM0028827

Date	Volume (Gallons)	SSO Impact	Cause
12/3/2024	416,666	Gallinas River	Hydraulic overflow caused solids in the WWTP clarifier(s) to flow over the weirs and into the effluent discharge.
1/3/2025 to 1/6/2025	4,700,000	Gallinas River	
1/13/2025	520,000	Gallinas River	
1/17/2025	800,000	Gallinas River	
3/10/2025	500,000	Gallinas River	
3/29/2025	500,000	Gallinas River	

Attachment D

City of Las Vegas WWTP

NPDES Permit ID No. NM0028827



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

Original via Electronic Mail

March 14, 2025

Travis Martinez
Utilities Director (Water)
City of Las Vegas
905 12th Street
Las Vegas, NM 87701
tmartintez@lasvegasnm.gov

Re: **City of Las Vegas - Wastewater Treatment Plant, Major, Individual Permit; SIC 4952; NPDES Compliance Evaluation Inspection; NPDES permit no. NM0028827; 01/13/2025**

Dear Travis Martinez:

Enclosed please find a copy of the report for the referenced inspection that the New Mexico Environment Department ("NMED") conducted at your facility on behalf of the U.S. Environmental Protection Agency ("USEPA"). This inspection report will be sent to the USEPA Region 6 Office in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System ("NPDES") permitting program in accordance with requirements of the federal Clean Water Act.

The inspection report includes an introduction, observations, records review, sampling activities and analytical results, areas of concern, and closing conference and follow-up. Further explanations and problems noted during this inspection are discussed in this inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify both the USEPA and NMED in writing regarding modifications and compliance schedules at the addresses below:

Rachel Matthews
New Mexico NPDES Enforcement Coordinator
U.S. Environmental Protection Agency
Region 6 Water Enforcement Branch (6ECDWM)
1201 Elm Street, Suite 500
Dallas, Texas 75202
Matthews.Rachel@epa.gov
214-665-8589

Susan LucasKamat
Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502
Susan.LucasKamat@env.nm.gov
505-946-8924

If you have any questions about this inspection report, please contact Nafis Fuad at 505-531-7956 or at nafis.fuad@env.nm.gov.

Sincerely,

Susan LucasKamat Digitally signed by Susan
LucasKamat
Date: 2025.03.14 07:36:47 -06'00'

Susan A. LucasKamat
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Roberto Bernier, USEPA (6ECDWM) via email Bernier.Roberto@epa.gov
Nancy Williams, USEPA (6ECDWA) via email Williams.Nancy@epa.gov
Rachel Mathews, USEPA (6ECDWM) via email Matthews.Rachel@epa.gov
Amy Andrews, P.E., USEPA (6ECDWM) via email Andrews.Amy@epa.gov
David Esparza, P.E., USEPA (6ECDWM) via email Esparza.David@epa.gov
McElroy, Damon, USEPA via email Mcelroy.Damon@epa.gov
Brent Larsen, USEPA (6WDPE) via email Larsen.Brent@epa.gov
Tung Nguyen, USEPA (6WDPE) via email Nguyen.Tung@epa.gov
Susan A. Lucas Kamat, NMED SWQB Point Source Manager, via email
Susan.LucasKamat@env.nm.gov
Nafis Fuad, NMED SWQB Compliance and Enforcement Lead, via email Nafis.Fuad@env.nm.gov
Shawnee Suazo, NMED SWQB Compliance and Enforcement Complex Facility Specialist, via
email Shawnee.Suazo@env.nm.gov
Luke Zhong, NMED SWQB Compliance and Enforcement Municipal and Industrial Specialist, via
email Luke.Zhong@env.nm.gov
Jason Martinez, NMED SWQB Permit and Certification Lead, via email
Jason.Martinez2@env.nm.gov
Avery Young, NMED GWQB PPS Domestic Lead, via email avery.young@env.nm.gov
Andrew Romero, NMED GWQB PPS via email andrewc.romero@env.nm.gov
Thomas Vigil, NMED EHB District II Manager, via email ThomasX.Vigil@env.nm.gov
Joshalyne Slumberg, City of Las Vegas via email Jslumberg@lasvegasnm.gov
James Lopez, City of Las Vegas via email Jlopez@lasvegasnm.gov
Joshua McClenahan, City of Las Vegas via email JMcClenahan@lasvegasnm.gov
Robert Espinoza, City of Las Vegas via email REspinoza@lasvegasnm.gov
David G. Romero, City of Las Vegas Mayor via email mayor@lasvegasnm.gov
Casandra Fresquez, City of Las Vegas Clerk via email cfresquez@lasvegasnm.gov



New Mexico Environment Department - Surface Water Quality Bureau

INSPECTION REPORT

Inspection Date(s):	01/13/2025	
Media Program:	Water	
Regulatory Program(s)	CWA	
Company Name:	City of Las Vegas	
Facility Name:	City of Las Vegas Wastewater Treatment Plant	
Facility Physical Location:	East Frontage Road of I-25	
(city, state, zip code)	Las Vegas, NM 87701	
Mailing address:	905 12 th Street	
(city, state, zip code)	Las Vegas, NM 87701	
County/Parish:	San Miguel County	
Facility Phone Number	505-426-4729	
Facility Contact:	Travis Martinez	Utilities Director (Water)
	tmartintez@lasvegasnm.gov	
FRS Number:	110011026941	
Identification/Permit Number:	NM0028827	
Media Identifier Number:	N/A	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Joshelyn Slumberg	City of Las Vegas	Operator Associate
James Lopez	City of Las Vegas	Operator in Training
Joshua McClenahan,	City of Las Vegas	Collections Supervisor
Robert Espinoza	City of Las Vegas	Wastewater Manager
Travis Martinez	City of Las Vegas	Utilities Director (Water)
Nafis Fuad	New Mexico Environment Department	Compliance and Enforcement Team Lead
Shawnee Suazo	New Mexico Environment Department	Complex Facility Specialist
Mauricio Tarazona	New Mexico Environment Department	Permitting and Certification Team
NMED Lead Inspector Signature/Date	Nafis Fuad Nafis Fuad Digitally signed by Nafis Fuad Date: 2025.03.13 21:26:36 -06'00'	
Supervisor Signature/Date	Susan LucasKamat Susan LucasKamat Digitally signed by Susan LucasKamat Date: 2025.03.14 07:35:43 -06'00'	

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Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

New Mexico Environment Department (NMED) inspectors Nafis Fuad (lead inspector), Shawnee Suazo and Mauricio Tarazona arrived at the City of Las Vegas Wastewater Treatment Plant (the “Site” or “Facility”) at 10:45 am on 01/13/2025 for an unannounced inspection. We met with Robert Espinoza, Utility Superintendent (Wastewater Division) to conduct the opening conference. I presented my credentials to Robert Espinoza and informed him that this was an NMED led inspection to determine compliance with the facility’s National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act (CWA). The scope of the inspection is a Compliance Evaluation Inspection (CEI) and includes an evaluation of the compliance of the facility with its NPDES permit and the CWA.

FACILITY DESCRIPTION

The City of Las Vegas has a total population of 12,000 – 13,000. The Facility serves a population of approximately 8,000-9,000. The rest of the population use septic systems and the facility has no immediate plans to connect them to the collection system. The facility has State of New Mexico ground water discharge permit 1118 (DP-1118). Ground water discharge permits are issued by the New Mexico Environment Department (NMED) Groundwater Quality Bureau (GWQB).

The facility is accessible from I-25 north. Take exit 343 toward NM-283/I-25 BUS/NM-329/Las Vegas. Take a right onto S Grand Ave and then immediately turn right onto Frontage Rd/Frontage Rd 2137/Romeroville Frontage Rd. Drive 0.3 miles south on Frontage Rd/Frontage Rd 2137/Romeroville Frontage Rd and then take a left. The facility is on the left 0.7 miles down the unnamed road right across the rail tracks. See the aerial photo below.

The design flow of this facility is 2.5 million gallons per day (MGD). The facility is defined as a major publicly owned treatment works (POTW) discharger. The facility has a total of four (4) lift stations within its sewer collection system.

Raw wastewater enters the plant via a 12-inch Parshall flume with a pulsar electro sonic totalizer flow meter, then passes through an automated bar screen and a grit removal system. From the bar screen, the influent flows by gravity through a channel that directs the flow to the aerated grit chamber where inorganic material such as sand and gravel are removed. The grit pumps pull a slurry of grit from the bottom of the grit chamber and pumps it to the grit classifier and cyclone. The cyclone separates much of the water from the slurry and returns it to the waste flow stream. The solid material is sent to the classifier, where almost all the remaining water and lighter organic material are removed and returned to the waste stream. The remaining grit is washed as it is moved up the classifier by a screw auger and is disposed to a waste bin for disposal. The effluent from the grit chamber flows through the grease well and on to the treatment train. Grease and other floating material collected in the grease well is

skimmed from the surface with a telescoping valve that discharges to the grease pump station, which transfers the grease to the digesters. Solids are finally disposed of at a landfill owned by the city. The facility was upgraded in 2018 when the two (2) primary clarifiers and old racetrack aeration basin were repurposed for emergency overflow capacity of approximately 2 million gallons.

From the headworks, wastewater travels to the east and west aeration basins for treatment. The 22 feet deep aeration (AB) basins have an aerobic zone, an intermediate zone, and an anoxic zone. The facility has three (3) blowers to provide air for the system. Decant flows by gravity to the two secondary clarifiers. Following the clarifiers is an inline micro disc filtration system. Effluent then passes through the ultraviolet (UV) disinfection system and flows through the 2' Cipolletti weir and secondary totalizer flow meter to the outfall.

The effluent from the treatment plant is discharged into the Gallinas River in Segment No. 20.6.4.220 of the Pecos River Basin.

The facility collects its effluent samples just above the weir. Reuse water is diverted before the weir and chlorinated before storage on-site. Waste Activated Sludge (WAS) is pulled from the aeration basins and sent to the aerobic digesters. Final disposal is at surface application sites owned by the city.

Onsite In-house analysis is completed for the following:

- Dissolved Oxygen, effluent, daily
- pH, effluent, daily
- Total Residual Chlorine, effluent, Weekly
- *E. coli*, effluent, weekly
- Total Suspended Solids, effluent, Weekly

Eurofins Albuquerque, Albuquerque, NM completes the following analysis three samples per week:

- Total Recoverable Aluminum, Effluent

Eurofins Albuquerque, Albuquerque, NM completes the following weekly analysis:

- 5-day Biological Oxygen Demand, Effluent
- Total Cadmium, Effluent
- Total Ammonia, Effluent
- Total Mercury, Effluent
- Bis(2-ethylhexyl) Phthalate

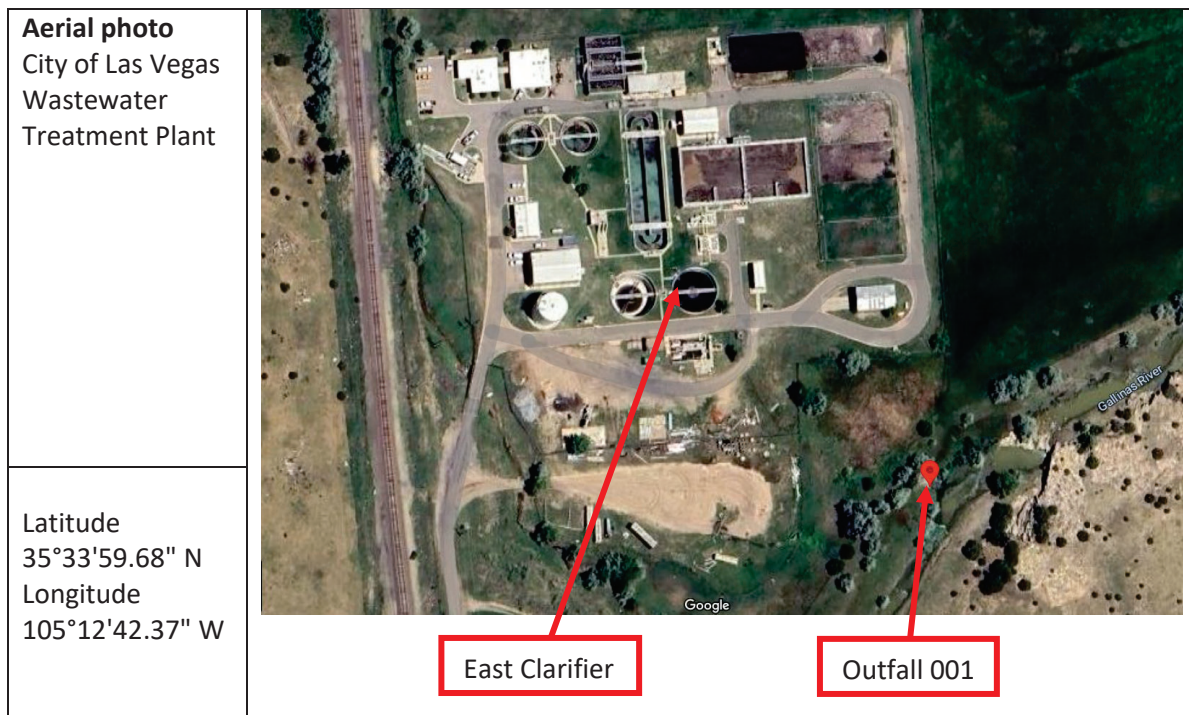
Eurofins Albuquerque, Albuquerque, NM completes the following monthly analysis:

- Total Nitrogen (TN), Effluent
- Total Phosphorous (TP), Effluent

Bio-Aquatic Testing, Inc., Carrollton, TX completes the following quarterly analysis:

- Whole Effluent Toxicity (WET) tests

The staffing level for the facility is currently at four (4) staff with one (1) level 4 wastewater operator, One (1) level 1 wastewater operator, one (1) operator in-training, and one (1) contracted level 2 wastewater laboratory technician. There is one (1) uncertified staff who helps in the laboratory. The level 4 wastewater operator is the wastewater manager, Robert Espinoza, who also has a level 2 wastewater laboratory technician certification. The collections side of the city has one (1) employee currently. Working hours are from Monday through Friday, 7:00 am to 3:30 pm. Two (2) staff are on call during off hours and weekends. At full staffing the facility operations employ one (1) supervisor, one (1) manager, and four (4) operators, and the collections employ one (1) collection systems supervisor, one (1) collection system operator, and four (4) collections labors.



Section II – OBSERVATIONS

After entry, we held an interview with the facility staff and inquired about recent non-compliances reported by the facility. The facility reported two overflows of solids from clarifiers though the outfall 001 into the Gallinas River, one on 12/03/2024 and the second from 01/03/2025 – 01/06/2025, with approximate volumes of 416,666 gallons and 4.7 million gallons respectively. The facility attributed these overflows to hydraulic overloading and other technical issues identified in a follow-up on -site training and technical assistance report (Appendix #6) prepared by Robert George from Oso del Agua LLC (OdA) on behalf of NMED GWQB.

During the interview Robert Espinoza informed us that although the permit design flow for the facility is 2.5 MGD, the facility operates without any issues up to 1.8 MGD. The average daily flow is 1.3-1.4 MGD. Seasonally, there is approximately 10-20% Inflow and Infiltration through the old lines. There have been some recent unexpected spikes in flow due to the unusual discharge from the City of Las Vegas Water Treatment Plant (WTP), which is also under the city utilities water division director.

The utility director, Travis Martinez, informed us that the WTP regularly discharged supernatant from settled backwash water to the WWTP. The WTP recently installed a Veolia Actiflo® pretreatment system which was run for 3 or 4 weeks and is suspected to have caused upsets in the filter beds of the WTP. Due to these upsets the WTP has started backwashing the filters at a frequency that is more than usual. Although the Actiflo® was not operational during the inspection due to a diesel spill from the system, Travis Martinez informed us that it might go into operation once the spill is cleaned up by Clean Harbors. He also informed us that the contract with Veolia is for 3 years.

There has also been unexpected spike in flow that the facility and the city utilities suspect to be originating from recent groundwater table rise. The facility has no plans for renovation or additional equipment to allow for increased wastewater flow.

The wastewater superintendent, Robert Espinoza, explained to us that the WWTP can handle the supernatant from the WTP at a controlled way in a lower flow rate. He also informed us that the WWTP has requested to be informed of the unexpected discharge from the WTP prior to the discharge happening, during working hours when they can prepare for the events. The follow-up on-site training and technical assistance report (Appendix 6) also suggested similar measures. Robert Espinoza expects the WWTP to be able to handle 150-200 gallons per minute (GPM) discharge from the WTP during the day and 100 GPM during the night in order for the WWTP to recover from the shock hydraulic loading. He informed us that discharge from the WTP at times at times have incurred a total flow to the WWTP of 2.3 MGD for about three days continuously which, in his opinion, is beyond the capacity of the WWTP to handle.

Travis Martinez explained that WTP has managed to bring down the flow of the discharge from the WTP to the WWTP to 200 GPM from 450 GPM initially. He also explained that the WTP is looking into installing a smaller sized pump to support a continuous low flow as opposed to a shock hydraulic loading to the WWTP.

We confirmed that the facility has approximately 100 miles of collection system with four (4) lift stations. Three (3) of the lift stations are on Supervisory Control and Data Acquisition (SCADA) system. Two (2) on call operators and the superintendent Robert Espinoza receives a call from the SCADA system in case of any emergency.

The facility informed us that there were three (3) overflows from the plant in 2024 – one (1) in the collection system during a 4-inch rainfall, one (1) in the plant around the same time, and one (1) in the

plant in fall that was contained in the facility grounds. We informed the facility that NMED Surface Water Quality Bureau (SWQB) did not have records of all the overflows and requested the facility's Standard Operating Procedures (SOP) for overflow reporting. The facility informed us that in case of an overflow the superintendent writes down the information and sends it to the laboratory manager who reports the information to the contacts on the written SOP. However, the email address for SWQB was incorrect. We provided the facility with the correct email addresses for SWQB and for the USEPA enforcement officer assigned to the facility. The facility also mentioned that potential sanitary sewer overflow (SSO) locations are at one or two manholes near the river. During the inspection the facility had no written SSO remediation policies and emergency SOPs. The utility director, Travis Martinez, informed us that the utility department is working on such an SOP. The utility director also informed us that the goals of the facilities program for managing, operating and maintaining the sanitary sewer conveyance system was to update manholes, install SCADA for the fourth lift station, and build up inventory. The facility informed us that there were no identified structural deficiencies in the collection system. The facility also informed us that it has an Operation and Maintenance (O&M) schedule for upgrading and replacing or repairing parts and equipment. The city utility department has recently hired an inventory specialist in order to develop an inventory. The facility has received a request for proposal (RFP) for upgrading the UV system from Kingdom Technology Services. The facility is also trying to procure a fan press.

The facility has a diesel generator that can provide backup power to the plant for an estimated 24 hours. The fuel capacity of the generator is 250 gallons, and the facility has a 75-gallon transfer tank. However, the generator does not provide backup power to the blower currently. The facility has also acquired funding for two (2) more generators. Each lift station has its own generator, which are tested automatically and are contracted for maintenance work.

We observed the decommissioned primary clarifiers had wastewater in them. Rober Espinoza explained that due to the pump being taken offline when those clarifiers were decommissioned, when the facility is hydraulically overloaded, the primary clarifiers receive wastewater which are then pumped to the digester directly, bypassing the treatment system. Robert Espinoza informed us that the pumps are still housed and can be brought into operation.

During the inspection we observed another overflow of solids from the overflowing clarifier being discharged into the Gallinas River through the outfall 001 at around 2:45 pm. We observed the east clarifier to overflow solids. Robert Espinoza explained the difficulty the facility is facing to adequately distribute flow to the east and west clarifier. Per the follow-up on-site training and technical assistance report (Appendix 6), approximately 2/3 of the flow is diverted to the east clarifier. That report also identified that the sludge blanket in the east clarifier is only a few feet below the surface by mid-morning, suggesting the hydraulic overload is affecting this clarifier more adversely. The report identified replacing the secondary clarifier splitter box to be a possible solution to remediate this issue.

We observed one of the recommendations from the technical assistance report, blocking an opening in the flow box just upstream of the splitter box with wooden plank to restrict overflow to the decommissioned racetrack aeration basin (Photo #3), was addressed by the facility. However, we observed even with this effort to block, some portion of the flow was entering into the decommissioned racetrack aeration basin. We also observed the content of the flow box was abruptly moving vertically, showing the effect of the hydraulic overloading at the plant. The flow box has two inlets, one from the influent and the other from the decommissioned racetrack, and one outlet which goes to a flow splitter box for secondary clarifiers.

We also observed overflowing solids into the UV housing during the overflow event. The facility informed us that after the overflow events the facility cleans the UV housing. We observed the proper placement of flow measurement device. We confirmed that the secondary flow measuring device is not compared to confirming the reading to be 10% of the primary weir. We observed solids in the effluent at the primary effluent flow measurement device, the weir. We observed the laboratory technician, Alyssa Chavez, and the laboratory uncertified staff taking sample of the effluent during the discharge event. We observed the autosampler (Global Water WS700) used to collect composite samples, stationed next to the sampling location did not have any thermometer to monitor the sample temperature.

We visited the outfall 001 and observed discolored effluent containing solids being discharged into the Gallinas River.

RECORDS REVIEW

I reviewed facility records. We reviewed the laboratory calibration and maintenance records and found them to be adequate. We observed that personnel handling samples and performing analyses have proper training or certification.

We observed records are maintained as required by permit. I reviewed the laboratory benchsheets, external laboratory reports, and discharge monitoring report (DMR) calculation spreadsheet for December 2024, and observed calculations are not performed per permit requirements (Appendix #5). Analytical results were not consistent with data reported on DMRs. These errors are described below.

The facility used influent flow recorded on benchsheets as flow, in conduit or through the treatment plant, on their DMRs.

The facility calculated the loading values for BOD and TSS correctly in their spreadsheet, however, they used the wrong flow value for BOD. Analysis result for BOD provided by external laboratory Eurofins Albuquerque and the chain of custody form indicates that a sample was collected for BOD on 12/03/2024, the DMR calculation spreadsheet provided by the facility shows the results for the BOD analysis sample collected on 12/03/2024 was used with flow value from 12/04/2024.

Also, the facility calculated the 30-day average for BOD and TSS incorrectly (BOD – 62.1 lb/day and TSS – 19.96 lb/day) and reported the incorrect data on the DMR. The correct values for those two pollutant loads should be 120.96 lb/day for BOD and 24.67 lb/day for TSS, respectively.

Furthermore, the facility measures only one sample per month for total nitrogen (TN) and total phosphorus (TP). However, in December 2024 the facility reported an incorrect value for the averages for TN and TP.

Analysis result for BOD provided by external laboratory Eurofins Albuquerque indicates that sample collected for BOD on 12/03/2024 was prepped or analyzed beyond the specified holding time. This does not meet regulatory requirements.

In December 2024, the facility monitored only 3 weeks of effluent sample for *E. coli* bacteria.

I reviewed the facilities Discharge Monitoring Reports (DMRs) and observed the facility had numerous exceedances from the permit limits for Dissolved Oxygen (Concentration), pH (minimum), Total Suspended Solids (7-day average concentration and loading), Total Recoverable Aluminum (30-day average and daily maximum, concentration and loading), Total Residual Chlorine (Concentration).

Section III – AREAS OF CONCERN

The following areas of concern were identified in this inspection:

1. The facility is discharging effluent containing solids that is not permitted by the NPDES permit through the outfall. (Photo #12 & #13; Appendix #4)
2. The autosampler for collecting composite samples had no method of meeting the sample storage requirements per 40 CFR Part 136. (Photo #11)
3. The facility did not have any hydraulic overload mitigation plan or any other SSO remediation plan. (Appendix #6)
4. The facility did not take measure to inform the public and downstream users while discharging effluent that does not meet permit requirements and has the potential to harm human health and the environment.
5. The facility has no written SOP for the WWTP operation or communication between the WTP and the WWTP. (Appendix #6)
6. Wastewater going into the decommissioned primary clarifiers are pumped directly to the digester bypassing the treatment system. (Photo #1)
7. Flow distribution between the secondary clarifiers needs to be adequately addressed. (Appendix #6)
8. The facility had numerous exceedances from the permit limits between September 13, 2023, and January 13, 2025. (Appendix #3)
9. The facility has exceeded its design flow of 2.5 MGD numerous times. (Appendix #3)
10. Facility has reported value in DMR that does not meet regulatory requirements. (Appendix #5)

11. The facility has used pollutant concentrations analyzed and flow values recorded on different days in order to calculate pollutant loading. (Appendix #5)
12. The facility needs to monitor its effluent at the required frequency per the NPDES permit. (Appendix #5)
13. The facility needs to report effluent flow recorded as flow, in conduit or through treatment plant. (Appendix #3 & #5)

CLOSING CONFERENCE:

NMED inspectors Nafis Fuad (lead inspector), Shawnee Suazo and Mauricio Tarazona conducted a closing conference at the City of Las Vegas Wastewater Treatment Plant at 3:15 pm on 01/13/2025 for the inspection. During the closing conference, I reviewed the #1 - #6 Areas of Concern noted during the inspection. Additionally, I noted the additional AOCs #7 - #9, after the onsite inspection which were not included in the closing conference.

Section IV – FOLLOW UP

I received the following information on 01/27/2025, after exiting the Facility on 01/13/2025:

1. Schematic of treatment process and a map of facility
2. Physical description of the units and process (description extracted from permit application is acceptable)
3. Copies of Operator Certifications or other training documentation evidence for all personnel who make operational changes at the WWTP.
4. Copies of Laboratory Technician Certifications or other training documentation evidence for all personnel who collect samples or run laboratory analyses (including personnel who only run some parameters like pH).
5. Evidence of the facility's stormwater permits.
6. Documents related to RFP for UV system.
7. Submitted and signed DMRs from October 2024 to December 2024 **along with** **all** documentation directly related to the creation of these specific DMRs, including:
 - Laboratory Bench Sheets (handwritten &/or typed) used to construct DMRs from above. – including related copies of the Laboratory Blue Book
 - Laboratory Sampling Reports used to construct DMRs (i.e., lab reports from external labs).
 - Excel (or other database) spreadsheets used to construct DMRs listed above.
 - Chain of Custody records (usually included as last page of Laboratory Report)
 - Calculation sheets used to calculate volumes for composite samples, or other records used to verify composite times/volumes used in autosamplers.
8. WET Testing Laboratory reports from January 2024 to December 2024.
9. Submitted and signed Sludge DMR with metals, pathogens and vector report from the last 1 year.
 - Sludge sampling Laboratory Sampling Reports
10. Flow meter logs showing daily flow rates from October 2024 to December 2024.
11. Calibration sheets for effluent primary and secondary flow meters within the last 1 year.
12. Calibration sheets for laboratory equipment within the last 1 year.

13. Excursion, Overflow or Bypass Summary Reports from October 2024 to December 2024.

I received an SOP for reporting noncompliance and a template for Public Service Announcement (PSA) to be used during future discharges of such kind into the Gallinas River (AOC #4) on 02/06/2025. I have received weekly reports from the facility on this noncompliance related to discharge of effluent with overflowing solids into the Gallinas River, detailing the facility's efforts to mitigate them and prevent any further noncompliance, until 02/07/2025.

The facility reported another noncompliance related to the solid overflow for 8 hours on 03/10/2025 with an approximate volume of 500,000 gallons. I have requested additional information on the event, inquiring the precise reasons for the noncompliance and the efforts on 03/11/2025. The facility has attributed this noncompliance to hydraulic overloading as well. The facility has not used the PSA template to notify any downstream users.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log

Appendix 2 – Opening and closing conference sign-in sheets

Appendix 3 – Effluent Violations from September 13, 2023, to January 13, 2025

Appendix 4 – Permit No. NM0028827 effective 12/01/2022, pages 1 - 2

Appendix 5 – Example of received reports and bench sheets and facility schematic diagram

Appendix 6 - Follow-up on-site training and technical assistance report prepared by Robert George from Oso del Agua LLC. (OdA) on behalf of NMED - GWQB.

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Appendix 1

Photograph Log



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 1

Location	City of Las Vegas Wastewater Treatment Plant	
City: Las Vegas	County/Parish: San Miguel County	State: New Mexico
Photographer: Nafis Fuad	File Name: IMG_0676	Date: 01/13/2025



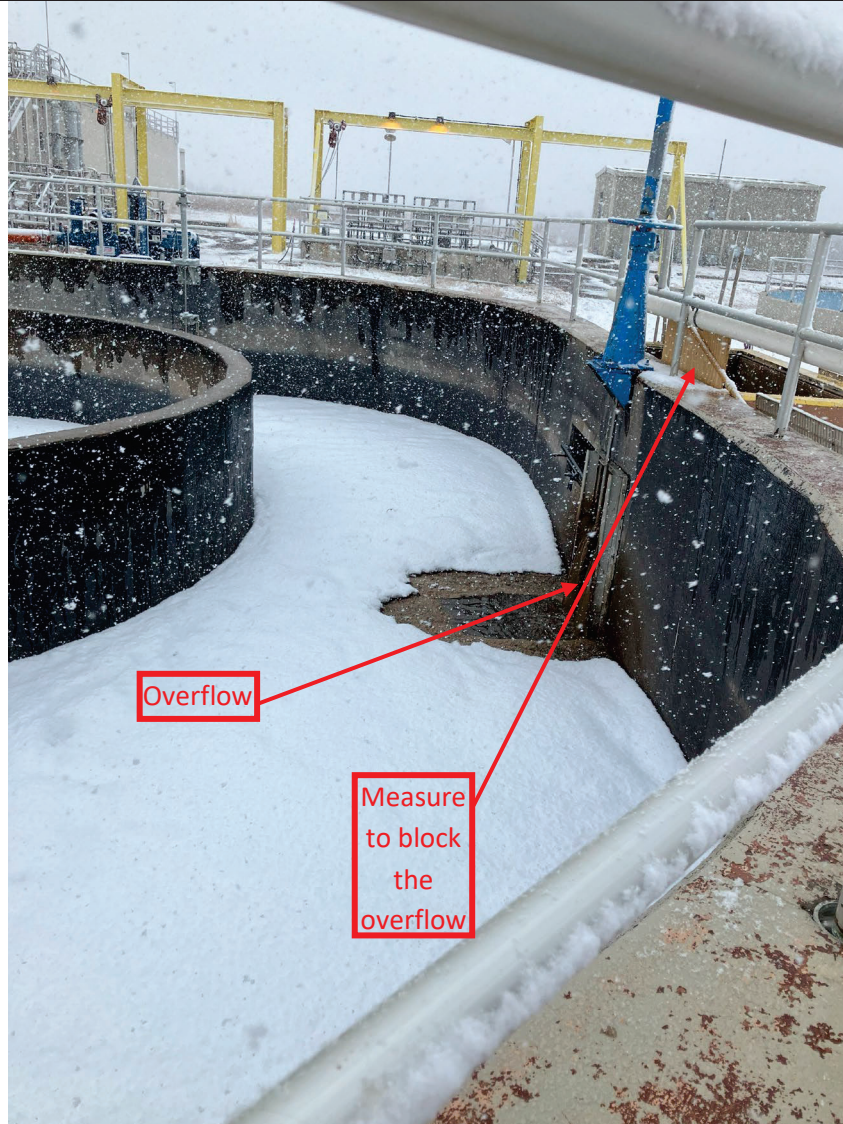
Decommissioned primary clarifier accumulating wastewater during hydraulic overloading. Refer to AOC #5.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 2

Location	City of Las Vegas Wastewater Treatment Plant	
City: Las Vegas	County/Parish: San Miguel County	State: New Mexico
Photographer: Nafis Fuad	File Name: IMG_0678	Date: 01/13/2025



Overflow of wastewater from the flow box into the decommissioned racetrack aeration basin despite the effort to block the opening from on the flow box with a wooden plank.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 3

Location	City of Las Vegas Wastewater Treatment Plant		
City: Las Vegas	County/Parish: San Miguel County	State: New Mexico	
Photographer: Nafis Fuad	File Name: IMG_0679	Date: 01/13/2025	
			
Flow box with device to block overflow into the decommissioned racetrack aeration basin.			



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 4

Location	City of Las Vegas Wastewater Treatment Plant		
City: Las Vegas	County/Parish: San Miguel County	State: New Mexico	
Photographer: Nafis Fuad	File Name: IMG_0680	Date: 01/13/2025	



Aeration basin.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 5

Location	City of Las Vegas Wastewater Treatment Plant		
City: Las Vegas	County/Parish: San Miguel County	State: New Mexico	
Photographer: Nafis Fuad	File Name: IMG_0682	Date: 01/13/2025	



Treatment in the aeration basin.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 6

Location	City of Las Vegas Wastewater Treatment Plant		
City: Las Vegas	County/Parish: San Miguel County	State: New Mexico	
Photographer: Nafis Fuad	File Name: IMG_0690	Date: 01/13/2025	
			
Unsettled solids in the east clarifier.			



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 7

Location	City of Las Vegas Wastewater Treatment Plant		
City: Las Vegas	County/Parish: San Miguel County	State: New Mexico	
Photographer: Nafis Fuad	File Name: IMG_0687	Date: 01/13/2025	



Unsettled solids overflowing with the effluent from the east secondary clarifier.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 8

Location	City of Las Vegas Wastewater Treatment Plant		
City: Las Vegas	County/Parish: San Miguel County	State: New Mexico	
Photographer: Nafis Fuad	File Name: IMG_0692	Date: 01/13/2025	



Solids in the UV channel and disc filter housing during the overflow event.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 9

Location	City of Las Vegas Wastewater Treatment Plant		
City: Las Vegas	County/Parish: San Miguel County	State: New Mexico	
Photographer: Nafis Fuad	File Name: IMG_0694	Date: 01/13/2025	



Solids in the UV channel and disk filter housing during the overflow event.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 10

Location	City of Las Vegas Wastewater Treatment Plant	
City: Las Vegas	County/Parish: San Miguel County	State: New Mexico
Photographer: Nafis Fuad	File Name: IMG_0695	Date: 01/13/2025



Solids in the flow measuring device, which is also the sampling location for monitoring requirements.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 11

Location	City of Las Vegas Wastewater Treatment Plant	
City: Las Vegas	County/Parish: San Miguel County	State: New Mexico
Photographer: Nafis Fuad	File Name: IMG_0696	Date: 01/13/2025



Autosampler (Global Water WS700) used to collect composite samples, stationed next to the sampling location with no thermometer to monitor the sample temperature.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 12

Location	City of Las Vegas Wastewater Treatment Plant	
City: Las Vegas	County/Parish: San Miguel County	State: New Mexico
Photographer: Nafis Fuad	File Name: IMG_0697	Date: 01/13/2025



Discolored effluent containing solids being discharged into the Gallinas River though outfall 001.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 13

Location	City of Las Vegas Wastewater Treatment Plant		
City: Las Vegas		County/Parish: San Miguel County	State: New Mexico
Photographer: Nafis Fuad		File Name: IMG_0700	Date: 01/13/2025
			
Discolored effluent containing solids discharged into the Gallinas River through outfall 001, directly downstream of outfall 001.			

Appendix 2

Opening and closing conference sign-in sheets

New Mexico Environment Department
 Surface Water Quality Bureau - Point Source Regulation Section
 1190 S St Francis Dr., Santa Fe, NM - 87505



NPDES Inspection attendance sheet

FACILITY: Las Vegas WWTPASSOCIATED PERMIT #: NM0028827LEAD INSPECTOR: Nafis FnadDate(s) of Inspection: 01/13/2025

ATTENDEES

Name	Affiliation	Title	Phone #	email	Opening conf.	Closing Conf.
Joshilyn Stumberg	CLV	operator associate	505-759-7599	JStumberg@lasvegasmn.gov	✓	✓
James Lopez	CLV	OIT	505-426-6533	JLopez@LasVegasnm.gov	✓	✓
Joshua McElarhan	CLV	collections tech	505 429 7070	JMcElarhan@LasVegasnm.gov	✓	✓
Robert Espinoza	CLV	WW Manager	505-718-5298	respinoza@LasVegasNM.gov	✓	✓
Shawnee	NMED	Inspector		Shawnee.Sep.20@nmed.nm.gov	✓	✓
Mauricio Tavarona	NMED	Inspector	505-531-7396	mauricio.tavarona@nmed.nm.gov	✓	✓
Travis Martinez	CLV	Utility Director	505-426-4724	tmartinez@LasVegasNM.gov	✓	✓

Appendix 3

Effluent Violations from September 13, 2023, through January 13, 2025

Permit Name	Version Nbr	Curr. Major Minor Status	Issue Date	Effective Date	Expiration Date
LAS VEGAS, CITY OF (SOUTH EAST	0	Major	10/7/2022	12/1/2022	11/30/2027

Version # 0

Outfall 001A

00300 Oxygen, dissolved [DO] / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
12/1/2022	11/30/2027	Grab	Daily

Limit	
Limit Unit Desc	Milligrams per Liter
Statistical Base	MO MIN
Limit Value	6.
DMR Values	
9/30/23	6.82
10/31/23	3.42
11/30/23	6
12/31/23	2.16
1/31/24	6.04
2/29/24	6
3/31/24	5.9
4/30/24	6.02
5/31/24	5.86
6/30/24	1.66
7/31/24	6
8/31/24	6
9/30/24	6
10/31/24	6
11/30/24	NODI=3
12/31/24	3.5

00400 pH / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
12/1/2022	11/30/2027	Grab	Daily

Limit		
Limit Unit Desc	Standard Unit	Standard Units
Statistical Base	MINIMUM	MAXIMUM
Limit Value	6.6	9.
DMR Values		
9/30/23	6.77	7.19
10/31/23	6.58	7.26
11/30/23	6.62	7.31
12/31/23	6.45	7.03
1/31/24	6.6	7.35
2/29/24	6.68	7.38
3/31/24	6.3	7.56
4/30/24	6.37	6.98
5/31/24	6.69	7.51
6/30/24	6.51	7.63
7/31/24	6.6	7.8
8/31/24	6.6	7
9/30/24	6.6	7.2
10/31/24	6.7	7.65
11/30/24	7.2	7.63
12/31/24	7	7.4

City of Las Vegas Wastewater Treatment Plant

NPDES # NM0028827

Inspection Date: 01/13/2025

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

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
12/1/2022	11/30/2027	24 Hour Composite	Weekly

Limit				
Limit Unit Desc	Pounds per D	Pounds per Day	Milligrams per	Milligrams per Liter
Statistical Base	30DA AVG	7 DA AVG	30DA AVG	7 DA AVG
Limit Value	626.	939.	30.	45.
DMR Values				
9/30/23	24.2	34.68	2.9	4.6
10/31/23	59.8	77.67	7.48	10.2
11/30/23	46.71	59.33	5.76	7.1
12/31/23	71.23	148.44	8.21	14.4
1/31/24	40.71	63.517	4.79	6.4
2/29/24	60.46	140.218	9.57	24.58
3/31/24	39.05	70.23	4.49	7.96
4/30/24	34.1	38.4	3.9	4.4
5/31/24	129.4	520.8	14.7	59.2
6/30/24	241.87	1672.4	21.83	73
7/31/24	60.1	110.8	4.8	7
8/31/24	40	79.1	3.8	5.7
9/30/24	26.7	46.3	2.8	5.1
10/31/24	39.1	53.7	3.7	3.6
11/30/24	55.9	65.9	3.8	4
12/31/24	19.9	29.5	1.7	2.5

01104 Aluminum, total recoverable / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
12/1/2022	11/30/2027	Grab	Three per Week

Limit				
Limit Unit Desc	Pounds per D	Pounds per Day	Micrograms pe	Micrograms per Liter
Statistical Base	30DA AVG	DAILY MX	30DA AVG	DAILY MX
Limit Value	1.38	2.076	66.37	99.55
DMR Values				
9/30/23	.334	.782	46.667	87
10/31/23	1.098	3.19	135.33	260
11/30/23	.817	1.389	95	140
12/31/23	2.136	14.598	308.667	2300
1/31/24	.687	2.208	91.533	310
2/29/24	.55	1.502	70.583	150
3/31/24	12.292	118.511	1456.75	14000
4/30/24	.5	1.06	59.07	120
5/31/24	.73	2.491	88.69	290
6/30/24	3.95	33.643	335.5	2900
7/31/24	.66	1.24	65.23	92
8/31/24	.15	.4	15.5	47
9/30/24	.35	.542	37.33	60
10/31/24	.3	.52	29.21	61
11/30/24	.21	.74	25.71	45
12/31/24	.19	1.52	10.73	62

50060 Chlorine, total residual / Location A / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
12/1/2022	11/30/2027	Grab	Daily

Limit	
Limit Unit Desc	Micrograms per Liter
Statistical Base	INST MAX
Limit Value	11.
DMR Values	
9/30/23	40
10/31/23	30
11/30/23	50
12/31/23	50
1/31/24	50
2/29/24	0
3/31/24	NODI=B
4/30/24	NODI=B
5/31/24	NODI=B
6/30/24	30
7/31/24	NODI=B
8/31/24	NODI=B
9/30/24	NODI=B
10/31/24	60
11/30/24	20
12/31/24	280

50050 Flow, in conduit or thru treatment plant / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
12/1/2022	11/30/2027	Totalizer	Continuous

Limit			
Limit Unit Desc	Million Gallons	Million Gallons per Day	Million Gallons
Statistical Base	30DA AVG	7 DA AVG	DAILY MX
Limit Value			
DMR Values			
9/30/23	1.001	1.216	.646
10/31/23	.959	1.1	.698
11/30/23	.987	.997	1.281
12/31/23	1.04	.934	2.488
1/31/24	.938	1.053	2.024
2/29/24	.912	1.25	2.155
3/31/24	.684	1.045	1.116
4/30/24	1.036	1.069	1.319
5/31/24	1.05	1.078	1.483
6/30/24	1.329	1.497	2.747
7/31/24	1.49	1.89	3
8/31/24	1.266	1.432	1.808
9/30/24	1.119	1.174	1.569
10/31/24	1.263	1.571	2.254
11/30/24	1.549	1.696	3.369
12/31/24	1.386	1.604	2.95

Appendix 4

Permit No. NM0028827 effective 12/01/2022, pages 1 - 2

PART I – REQUIREMENTS FOR NPDES PERMITS**SECTION A. LIMITATIONS AND MONITORING REQUIREMENTS**

1. FINAL Effluent Limits – 2.5 MGD Design Flow

During the period beginning the effective date of the permit and lasting through the expiration date of the permit (unless otherwise noted), the permittee is authorized to discharge treated municipal wastewater to the Gallinas River, in Segment Number 20.6.4.220, from Outfall 001. Such discharges shall be limited and monitored by the permittee as specified below:

EFFLUENT CHARACTERISTICS		DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
		Standard Units			
POLLUTANT	STORET CODE	MINIMUM	MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH	00400	6.6	9	Daily	Grab

EFFLUENT CHARACTERISTICS		DISCHARGE LIMITATIONS						MONITORING REQUIREMENTS	
		lbs/day, unless noted			mg/l, unless noted (*1)				
POLLUTANT	STORET CODE	30-DAY AVG	DAILY MAX	7-DAY AVG	30-DAY AVG	DAILY MAX	7-DAY AVG	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	50050	Report MGD	Report MGD	Report MGD	N/A	N/A	N/A	Continuous	Totalizing Meter
Biochemical Oxygen Demand, 5-day	00310	417	N/A	542	20	N/A	26	One/Week	24-Hour Composite
Biochemical Oxygen Demand, 5-day, % removal, minimum	50076	≥ 85% (*5)	N/A	N/A	N/A	N/A	N/A	One/Week	Calculation (*5)
Total Suspended Solids	00530	626	N/A	939	30	N/A	45	One/Week	24-Hour Composite
Total Suspended Solids, % removal, minimum	81011	≥ 85% (*5)	N/A	N/A	N/A	N/A	N/A	One/Week	Calculation (*5)
E. Coli Bacteria (*2)	51040	N/A	N/A	N/A	126 (*2) cfu/100 ml	410 (*2) cfu/100 ml	N/A	One/Week	Grab
Total Recoverable Aluminum	01105	1.38	2.076	N/A	66.37 ug/l	99.55 ug/l	N/A	Three/Week	Grab
Total Cadmium	01027	0.0102	0.0153	N/A	0.491 ug/l	0.736 ug/l	N/A	One/Week	Grab
Total Residual Chlorine	50060	N/A	N/A	N/A	N/A	11 ug/l (*3)	N/A	Daily (*3)	Instantaneous Grab (*3)
Total Ammonia	00610	83	125	N/A	4	6	N/A	One/Week	Grab
Total Mercury	71900	0.0160	0.0186	N/A	0.770 ug/l	0.891 ug/l	N/A	One/Week	Grab
Bis(2-ethylhexyl)Phthalate	39100	0.484	0.726	N/A	23.22 ug/l	34.83 ug/l	N/A	One/Week	Grab
Dissolved Oxygen (minimum)	00300	N/A	N/A	N/A	6.0	N/A	N/A	Daily	Grab
Total Nitrogen (*9, *10)	00600	145	Report	N/A	13.0	Report	N/A	One/Month	24-Hour Composite
Total Phosphorous (*9)	00665	23.9	Report	N/A	2.14	Report	N/A	One/Month	24-Hour Composite

WHOLE EFFLUENT TOXICITY TESTING (7-Day Chronic Static Renewal/NOEC) (*4)	VALUE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Ceriodaphnia dubia	Report	Once/Quarter	24-Hr Composite
Pimephales promelas	Report	Once/Quarter	24-Hr Composite

Appendix 5

Example of received reports and bench sheets and facility schematic diagram

Las Vegas Wastewater Treatment Plant

Dec 2024

(Last Month)

green denotes cell value is calculated

red number means daily sheet missing, could not verify

blue cell denotes changed from previous worksheet

Blue Numbers

Date Day		Influent												Effluent											
		Flow	eff flow	7D avg	BOD	TSS	TDS	TP	Chloride	TKN	Nitrate / Nitrite	Ammonia	pH	DO	Temp	TRC	NTU	BOD	7D avg	BOD	7D avg	TSS	7D avg	TSS	
		MGD		MGD	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	units	mg/L	deg-C	mg/L	units	mg/L	mg/L	lbs	lbs	mg/L	mg/L	lbs	
1	Sun	8701112320	1.458																						
2	Mon	8702974980	1.863										7.21	12.80	14.40	0.00	0.19								
3	Tue	8703675840	0.701										7.37	6.90	16.20	0.00	0.45								
4	Wed	8706625540	2.950		53.00	27.00	750.00	6.70	130.00	53.00	0.00	31.00	7.39	7.40	12.70	0.00	1.18	16.00	16.00	393.65	393.65	1.20	1.20	29.52	
5	Thu	8708204540	1.579										7.21	12.80	14.40	0.00	0.19								
6	Fri	8709647360	1.443										7.38	5.60	16.30	0.00	0.05								
7	Sat	8710991870	1.345	1.604									7.21	6.90	16.00	0.00	0.22								
8	Sun	8712240130	1.248										7.22	6.80	16.00	0.00	0.51								
9	Mon	8713451520	1.211										7.41	6.70	17.40	0.00	0.45								
10	Tue	8715042820	1.591										7.35	6.00	14.60	0.00	0.16								
11	Wed	8716338180	1.295		490.00	236.33							7.44	7.00	14.70	0.00	0.52	0.00	0.00	0.00	0.00	1.47	1.47	15.84	
12	Thu	8717576190	1.238										7.40	6.10	17.70	0.00	0.51								
13	Fri	8719353860	1.778										7.36	7.40	14.00	0.00	0.71								
14	Sat	8720693250	1.339	1.448									7.30	8.40	13.10	0.00	0.72								
15	Sun	8721909760	1.217										7.33	8.00	12.90	0.00	0.49								
16	Mon	8723090430	1.181										7.20	8.90	10.90	0.00	0.73								
17	Tue	8724296700	1.206										7.40	5.70	14.40	0.00	0.51								
18	Wed	8725478400	1.182		68.00	45.83							7.25	6.00	17.30	0.00	1.12	0.00	0.00	0.00	0.00	2.47	2.47	24.35	
19	Thu	8727078910	1.601										7.20	8.90	10.90	0.00	0.73								
20	Fri	8728361980	1.283										7.26	7.40	14.30	0.00	0.89								
21	Sat	8729908220	1.546	1.364									7.22	6.40	11.92	0.00	0.32								
22	Sun	8731159550	1.251										7.21	6.90	12.55	0.00	0.41								
23	Mon	8732249090	1.090										7.36	6.10	17.50	0.00	0.66								
24	Tue	8733446140	1.197										7.31	7.20	13.30	0.01	0.75								
25	Wed	8735412220	1.966		120.00	194.67							7.39	6.30	16.20	0.01	0.32	5.50	5.50	90.18	90.18	1.77	1.77	28.96	
26	Thur	8736487420	1.075										7.32	6.00	15.00	0.00	0.64								
27	Fri	8737452000	0.965										7.05	4.90	15.60	0.01	0.54								
28	Sat	8739039230	1.587	1.358									7.30	3.50	16.10	0.00	0.69								
29	Sun	8740289540	1.250										7.33	4.30	13.40	0.00	0.52								
30	Mon	8741464060	1.175										7.24	7.90	13.60	0.28	0.81								
31	Tue	8742634500	1.170										7.32	8.10	14.20	0.00	1.24								
30-day Min			0.701										7.05	3.50											
30-day Avg			1.386		182.75	125.96							7.32	8.10				5.38	62.15		1.73		19.96		
30-day Max			2.950										7.44	12.80		280.00									
7-day Avg				1.604															16.00		393.65		2.47		

BOD Removal 0.97

TSS Removal 0.99

"NETDMR-Datashet 2024.xlsx - Dec" - Page 1

City of Las Vegas Wastewater Treatment Plant
NPDES # NM0028827
Inspection Date: 01/13/2025

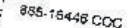
EDD (Type) _____

Cooler Temp (including CF): $1.4 - 0.1 = 1.3^{\circ}\text{C}$ (approx)[illegible]

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all processed w/ REC - DAB (2/9/24)

11 10 9 8 7 6 5 4 3 2 1

[illegible]

Inspection Date: 01/13/2025

Eurofins Albuquerque analysis report for 12/03/2024 samples - Page 7

Client Sample Results

Client: City of Las Vegas, NM
Project/Site: DMR

Job ID: 885-16446-1

Client Sample ID: Effluent

Lab Sample ID: 885-16446-2

Date Collected: 12/03/24 09:25

Matrix: Water

Date Received: 12/06/24 08:43

Method: EPA 625.1 - Semivolatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Bis(2-ethylhexyl) phthalate	ND	H	0.0050	0.00028	mg/L	-	12/11/24 07:29	12/11/24 15:52	1
Surrogate	%Recovery	Qualifier	Limits				Prepared	Analyzed	Dil Fac
2,4,6-Tribromophenol (Surr)	68		31 - 132				12/11/24 07:29	12/11/24 15:52	1
2-Fluorobiphenyl (Surr)	69		29 - 112				12/11/24 07:29	12/11/24 15:52	1
2-Fluorophenol (Surr)	34		28 - 114				12/11/24 07:29	12/11/24 15:52	1
Nitrobenzene-d5 (Surr)	57		15 - 314				12/11/24 07:29	12/11/24 15:52	1
p-Terphenyl-d14 (Surr)	88		20 - 141				12/11/24 07:29	12/11/24 15:52	1
Phenol-d5 (Surr)	18		8 - 424				12/11/24 07:29	12/11/24 15:52	1

Method: EPA 200.7 Rev 4.4 - Metals (ICP) - Total Recoverable

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Aluminum	0.018	J	0.020	0.017	mg/L	-	12/10/24 06:46	12/12/24 13:07	1

General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Biochemical Oxygen Demand (SM 5210B)	16	H H3	2.0	2.0	mg/L	-		12/11/24 14:18	1
Ammonia (SM4500 NH3 C LL)	ND		0.27	0.12	mg/L	-	12/10/24 14:19	12/11/24 10:35	1

Eurofins Albuquerque analysis report for 12/03/2024 samples - Page 4

Definitions/Glossary

Client: City of Las Vegas, NM

Job ID: 885-16446-1

Project/Site: DMR

Qualifiers

GC/MS Semi VOA

Qualifier	Qualifier Description
H	Sample was prepped or analyzed beyond the specified holding time. This does not meet regulatory requirements.

Metals

Qualifier	Qualifier Description
A	Continuing Calibration Verification (CCV) is outside acceptance limits, low biased.
J	Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.

General Chemistry

Qualifier	Qualifier Description
H	Sample was prepped or analyzed beyond the specified holding time. This does not meet regulatory requirements.
H3	Sample was received and analyzed past holding time. This does not meet regulatory requirements.

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
⚖	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

“NETDMR-DataSheet 2024.xlsx – Dec” – Page 2

Las Vegas Wastewater Treatment Plant

Dec 2024

(Last Month)

		converts to ug/L below												As N		TKN+Nitrate/ TN		
Date	Day	7D avg lbs	E. Coli col	Fecal Coliform col	Aluminum lbs	Cadmium mg/L lbs	Mercury mg/L lbs	Ammonia, NH3 mg/L lbs	TKN mg/L	TDS mg/L	TP mg/L lbs	Chloride mg/L	Nitrate/ Nitrite as N mg/L		TN mg/L lbs			
1	Sun																	
2	Mon				0.018	0.2797												
3	Tue				0.018	0.1052												
4	Wed	29.52			0.062	1.5254	0.00	0.00	0.00	0.00	0.00	610.00	0.68	16.73	76.00	13.00	13.000	319.84
5	Thu																	
6	Fri		6.00															
7	Sat																	
8	Sun																	
9	Mon				0.000	0.0000												
10	Tue				0.000	0.0000												
11	Wed	15.84			0.000	0.0000	0.00	0.00	0.00	0.00	0.00							
12	Thu		4.44															
13	Fri																	
14	Sat																	
15	Sun																	
16	Mon				0.000	0.0000												
17	Tue				0.000	0.0000												
18	Wed	24.35	5.30		0.000	0.0000	0.00	0.00	0.00	0.00	0.00							
19	Thu																	
20	Fri																	
21	Sat																	
22	Sun																	
23	Mon				0.000	0.0000												
24	Tue				0.000	0.0000												
25	Wed	28.96			0.020	0.3279	0.00	0.00	0.00	0.00								
26	Thur																	
27	Fri																	
28	Sat																	
29	Sun																	
30	Mon																	
31	Tue																	
30-day Min																	18.02	208.42
30-day Avg			5.21		10.727	0.187	0.00	0.00	0.00	0.00		0.94	10.90					
30-day Max			6.00		62.000	1.525	0.00	0.00	0.00	0.00		0.68	16.73				13.00	319.84
7-day Avg		29.52			ug/L	lbs/day												
			geomean	geomean														

30-day average needs to be the same value since there is only one sample for the month

Missing 4th weekly sample

City of Las Vegas Wastewater Treatment Plant

NPDES # NM0028827

Inspection Date: 01/13/2025

December 2024 daily flows recorded

Month December Daily Flows Year 2024

	Influent Flow Cont.		Influent Flow Discharge Cont.		Effluent Flow Cont.		UV Channel Flow Cont.	
Date *	8699654140	1.95	10229689200	1.36	7333297150	1.36	4246808320	1.35
1	8701112320	1.86	10226052400	1.26	7334665220	1.82	4248162820	1.66
2	8702974980	1.96	10227820500	1.80	7336489470	1.82	4249826000	1.66
3	8703675840	1.70	10229461000	1.60	7338168320	1.67	4251406590	1.58
4	8706625540	2.94	10231371800	1.91	7340149250	1.98	4253170690	1.76
5	8708204540	1.57	10232861700	1.48	7341602300	1.45	4254622460	1.45
6	8709647360	1.44	1023426700	1.80	734298690	1.29	4255961600	1.33
7	8710991870	1.34	10235501600	1.27	7344067070	1.16	4257239300	1.27
8	8712740130	1.24	10236708900	1.26	7345272140	1.15	4258431350	1.19
9	8713451520	1.21	10237865000	1.15	7346365440	1.14	4259600130	1.16
10	8715042520	1.59	10239383600	1.51	7347860480	1.49	4261092350	1.49
11	8716338180	1.29	10240633300	1.26	7349119490	1.25	4262364420	1.27
12	8717376190	1.23	102418190000	1.23	7350312960	1.19	4263599100	1.23
13	8719338860	1.77	10243616800	1.72	7351978500	1.66	4265236480	1.63
14	8720693250	1.55	10244880000	1.24	7353205250	1.22	4266496510	1.26
15	8721904760	1.21	10246018000	1.13	7354351100	1.14	4267646720	1.15
16	8723090430	1.18	10247144500	1.13	7355344900	1.89	4268777470	1.13
17	8724296700	1.20	10248281100	1.13	7356448110	1.07	4269920720	1.14
18	8725478400	1.16	10249414700	1.13	7357571140	1.08	4271066880	1.14
19	8727078910	1.60	10250561600	1.64	7359064060	1.53	4272598780	1.53
20	8728361980	1.28	10252280800	1.22	7360164860	1.10	4273814780	1.21
21	8729908220	1.54	10253840000	1.55	7361595900	1.43	4275269380	1.45
22	8731159550	1.25	10255091700	1.25	7362709400	1.11	4276498480	1.22
23	8732249090	1.08	10256153600	1.06	7363813380	1.10	4277549820	1.05
24	8733446140	1.19	10257310700	1.15	7364754430	1.94	4278720770	1.17
25	8735412220	1.910	10259413000	2.10	7366025790	1.87	4280588540	1.80
26	8736487420	1.07	10260626400	1.21	7367679490	1.05	4281754370	1.16
27	8737452000	1.96	10261565400	1.93	7368541180	1.86	4282692610	1.93
28	8739039230	1.54	10263079900	1.51	7370016770	1.47	4284150630	1.45
29	8740289540	1.25	10264284200	1.20	7371207680	1.19	4285355000	1.20
30	8741764060	1.17	10265404400	1.12	7372271100	1.51	4286478080	1.12
31	8742634500		10266550000		7373383170		4287621630	

* Space By Word (Date) for last reading last month.

Flow, in conduit or through treatment plant needs to be reported from this

Plant schematic provided



Appendix 6

Follow-up on-site training and technical assistance report
prepared by Robert George from Oso del Agua LLC. (OdA)
on behalf of NMED GWQB.

City of Las Vegas WWTF (DP-1118)

Follow-up On-site Training and Technical Assistance Report

Site Visit Date: December 4, 2024

Report Date: December 16, 2024



View of the City of Las Vegas WWTF

OVERVIEW

Oso del Agua LLC (OdA) has been contracted by the New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB) to provide on-site training and technical assistance to wastewater treatment facilities throughout New Mexico to help facilities achieve and maintain compliance with their Ground Water/Liquid Waste Discharge Permits. Services are delivered at no-cost to facility owners/operators and are not related to any enforcement actions. Note that the suggestions made within this report are only recommendations, not enforceable requirements.

ON-SITE VISIT SUMMARY

Robert George, Field Training Specialist for Oso del Agua LLC performed a follow-up on-site visit to the wastewater treatment facility (WWTF) that serves the City of Las Vegas on December 4, 2024. OdA previously visited this facility on July 27, 2022 and July 11, 2024. Reports for those visits were issued on August 5, 2022 and July 18, 2024 (respectively). Both reports should be considered as companions to this report and the July 18, 2024 report is referenced directly herein. During the recent visit, Mr. George met with the City's Wastewater Utility Superintendent Robert Espinoza, and other staff at the WWTF. Andrew Romero with the NMED GWQB also participated in the site visit. OdA spoke with Paul Kennedy from Souder Miller and Associates Operations Services and the city's Interim Utilities Director, Travis Martinez, a few days after the visit.

This facility discharges reclaimed effluent pursuant to ground water Discharge Permit DP-1118, which was last renewed on January 19, 2018, and expired on January 18, 2023 (the permit continues administratively and is in the process of being renewed). DP-1118 authorizes the City to discharge up to 520,000 gallons per day (gpd) of Class 1A reclaimed domestic wastewater for sprinkler irrigation at 15 city-owned re-use locations, dispense reclaimed wastewater for temporary uses from a standpipe, and transfer reclaimed wastewater to other entities for reuse under separate Discharge Permits. Effluent is limited to 10 mg/L total nitrogen (TN). The facility also discharges to an outfall on the Gallinas River pursuant to a National Pollutant Discharge Elimination System (NPDES) permit NM0028827.

The WWTF continues to suffer from the effects of the Hermits Peak/Calf Canyon Fire and from long-standing solids handling problems. The City's water treatment facility is struggling to manage the water quality that has resulted following the fire. As a result, the water treatment facility is discharging large amounts of water to the WWTF. Meanwhile, the solids handling and disposal processes at the wastewater plant continue to operate in only a limited capacity and upgrades are badly needed. Other issues related to the DP-1118 point of compliance and mechanical problems at the plant remain unresolved. OdA evaluated the treatment system and provided training/recommendations in the following areas:

1. Hydraulic Issues
2. Solids Handling
3. Point of Compliance for DP-1118

Note that while efforts have been made to make this report accessible to the general reader, the technical sections are intended primarily for knowledgeable operators, lab analysts, and engineering professionals. Not all industry acronyms are defined, and the author assumes that some of the scientific/technical concepts employed are already understood by the reader.

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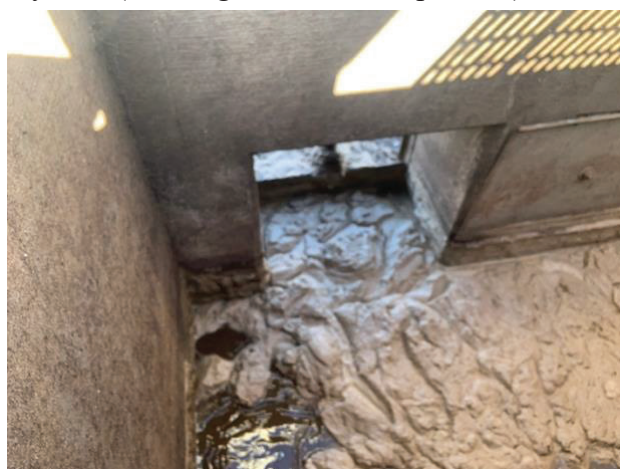
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HYDRAULIC ISSUES

The City's water treatment plant has been discharging larger volumes of water to the sewer system recently, causing increased turbidity in the wastewater effluent and threaten to cause a washout of the sludge blankets in the secondary clarifiers. The water plant has historically discharged filter backwash water to the sewer through a stabilizing lagoon at rates that did not pose a problem for the wastewater treatment plant. But the city installed a Veolia ballasted clarification pre-treatment unit to deal with the raw water quality following the Hermits Peak/Calf Canyon fire, and the pretreatment unit has dramatically increased the flow to the sewer. The city's WWTF typically treats around 1.0 MGD of sewage but is receiving around 120,000 gpd from the Veolia unit and has experienced additional hydraulic loads of around 0.5 – 1.0 MGD when the water plant has been forced to drain clarifiers to deal with water quality problems. While it is not possible to stop the flows altogether, there may be a few things that can be done to help mitigate the impact upon the wastewater treatment system.

SECONDARY CLARIFIER FLOW SPLIT – The hydraulic loading to the secondary clarifiers is controlled at the secondary clarifier splitter box. As discussed in Oda's last report, this splitter box offers less than ideal flow control and should (ultimately) be replaced with a unit that provides more head (through higher walls), better valves, and visual feedback to the operators. But until long-term actions can be taken, the operation of the splitter box may be able to be improved.

Unwanted Overflow: Currently, when the operators try to balance the flow between the east and west clarifiers, they choke down the valve feeding the east clarifier (forcing more flow to the west unit). Unfortunately, under the current high hydraulic load conditions, choking down this valve results in overflow into the abandoned rack-track aeration basin through an opening in the flow box just upstream of the splitter box. This has two negative impacts: (1) the splitter box cannot be used to evenly distribute flow to both clarifiers and (2) unwanted flow enters the abandon aeration basin, from where it must eventually be removed and returned to the treatment system (harming the treatment process). The overflow point is shown in this picture:



Blocking the Overflow: This problem may be able to be addressed by installing a temporary block at this overflow point. Oda recommends constructing blocking from a piece of plywood that fits the opening mounted with a long board (2 x 4) that is cut to the proper size to allow it to be “jammed” against the opposing wall to hold the plywood blocking in place. Blocking the overflow point will increase the head in the clarifier splitter box. The additional head may be sufficient to allow the east valve to

be choked down and improve the flow split. The hazard in this approach is that under very high flow conditions, the clarifier splitter box could overflow, spilling mixed liquor onto the ground.

To avoid this, the temporary blocking should only extend around 3 – 4 inches higher than the current water level. This way, if the water level reaches the top of the blocking, it will overflow into the abandoned aeration basin (as before) but should not overflow the splitter box. Experimentation may be necessary to arrive at the correct balance on how high the blocking can extend without creating an overflow threat at the splitter box. But getting the best hydraulic performance out of the clarifiers by balancing their loading is critical, *so the effort to block the overflow should be a high priority.*

Balancing the Loading to the Clarifiers: Once the proper blocking is in place, a concerted effort to balance the flow to the secondary clarifiers should be undertaken. The current flow split is estimated to be around 1/3 to the west clarifier and 2/3's to the east. The east clarifier sludge blanket is only a few feet below the surface by mid-morning (and visible), confirming that the higher hydraulic load is being applied to this clarifier. If solids washout occurs, it will happen to the east clarifier first (as has historically been the case in OdA's experience). By balancing the loading closer to 50/50 between the clarifiers, they can be used to their best effect. The effluent quality should improve, and catastrophic solids washouts may be avoided. While this approach *may* improve the situation somewhat, a long-term effort to create a project to replace the secondary clarifier splitter box should remain a priority.

MANAGING THE DISCHARGES AT THE WATER PLANT – The other area that should be addressed to mitigate the impact of the hydraulic loading problem is to ensure that everything that can be done at the City's water treatment plant is being done.

Manage the Discharges: High discharge flows to the sewer have much less impact at night when other flows are low. If possible, the city should coordinate releases from the water plant to either:

1. Send the discharges to the WWTF during low flow periods (i.e., at night), or;
2. Spread the discharges over the longest period possible at the lowest flow rate possible to minimize the impact upon the WWTF.

Equipment Changes at Water Plant: Doing either of these may require that new pumps or new controls be installed at the water plant, but this issue is important enough to warrant significant equipment changes/expenditure.

Communicate and Coordinate: Another important area that can be improved is communication between the water and wastewater facilities. The operators of the water treatment plant should be cognizant of the potential impact of the discharges upon the WWTF and should be communicating and coordinating with the wastewater operators to minimize the impacts. OdA recommends that the city create a regular meeting once a month for the next three months where the wastewater superintendent, water treatment superintendent, and utilities director meet to discuss managing the flows and seek workable strategies.

SOLIDS HANDLING

Continuing to reduce the solids inventory remains a primary goal for this WWTF. A description of the solids handling issues and recommendations was included in OdA's July 18, 2024 report (please refer to that report for more information). The operators have made efforts to clean out some of the sludge drying beds to create space for sludge drying, which will help somewhat, especially during the winter months. But the overall progress on addressing the solids handling problems has stalled, including on the following issues:

1. The catch-up transport of sludge to the disposal site by a contractor over the summer did not occur. This was intended to reduce the solids in the treatment system and digesters and allow the operators to take over afterward.
2. A sludge dewatering unit (fan-press) was successfully demonstrated at the facility, but only limited progress toward funding, designing, and installing the fan-press has occurred since. Installing a permanent unit is very important to meeting the long-term solids handling needs of this facility.
3. Only limited effort toward applying for a Solid Waste Disposal Plan has been made. The landfill has been contacted, but the NMED Solid Waste Bureau has not. A Disposal Plan will take at least 6 months to secure and will be needed to dispose of solids at the landfill, which is the best long-term strategy for solids disposal.

It is unfortunate that the catch-up effort using a contractor to haul and apply sludge to the city's disposal site did not occur, but that is past. The fan-press was successfully demonstrated, and the city now needs to move forward on designing and funding the installation of a permanent fan-press dewatering unit. A Solid Waste Disposal Plan is also needed so that the dewatered sludge produced from the new fan-press can be disposed in the most efficient manner. Securing a disposal plan quickly will also allow the city to dispose of dried sludge that is stockpiled at the WWTF. These issues are discussed in more detail below.

FAN-PRESS PROJECT – The fan-press sludge dewatering equipment project starts with the creation of an engineering scope of work (SOW) that describes the project that the city is seeking to have designed. The job of creating the SOW falls to the WWTF Superintendent and will be carried out by one of the city's on-call engineering firms. The design SOW should include the following:

- Design of a sludge dewatering unit to be retro-fitted into the existing Parkson unit building. This will require the removal of the Parkson equipment, installation of a fan-press that meets the (exact) specifications of the unit that the city is seeking, plumbing, electrical, heating, lighting, and mechanical changes to accommodate the unit and its elements. The design will need to provide a method for feeding sludge to the fan-press from the digesters at a consistent rate and for transporting the dewatered sludge from the fan-press to a rolloff dumpster. The transfer method should evenly fill the dumpster while the fan-press is operational with minimal operator intervention.

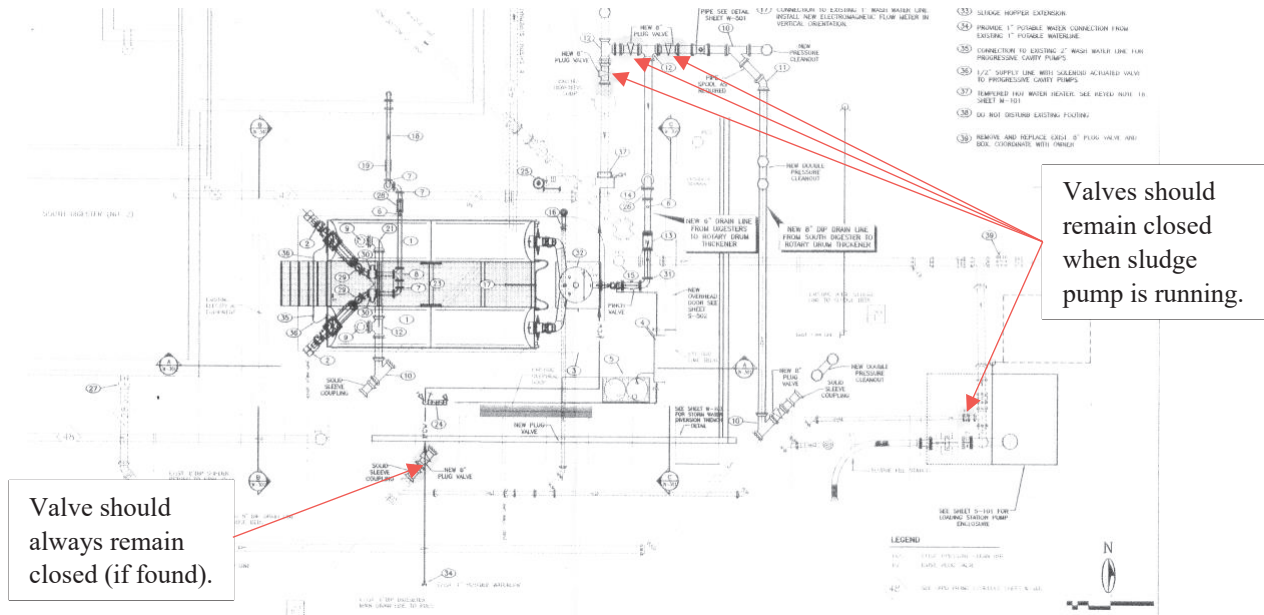
- Suitable draft design reviews at 50%, 65% and 95% should be included to allow the facility operators to comment on the operability, maintainability, and practicality aspects of the design so that the city gets the best product possible.
- Preparation of an engineer's Estimate of Probable Cost (EPC) for the equipment, installation, and construction of the project.
- Preparation of construction and bid documents for the equipment, installation, and construction of the project.
- Submission of the construction documents to NMED-GWQB for review and approval prior to bid.
- Construction oversight of the project (unless the city seeks to hire an independent construction observer, but this person should not be associated with the contractor).
- Management of the bid process (if desired by the city).
- Preparation of as-built drawings at the conclusion of the project and submission of the as-builts to the city and NMED-GWQB.
- Support during start-up of the equipment, including ensuring that all elements work as designed and support for any warranty claims with manufacturers.

Mr. Espinoza should begin drafting the SOW for the engineering services for this project as soon as possible. In a conversation with the city's Interim Utilities Director (Travis Martinez), Mr. Martinez indicated that the funding originally intended for the replacement of the Terragator® equipment can be repurposed to the fan-press project. It is unclear what this project will cost, but the EPC should help clarify this prior to bidding so the city can be prepared to fund the project.

SOLID WASTE DISPOSAL PLAN – To perform landfill disposal, the City will first need to secure a Solid Waste Disposal Plan (permit) from the NMED Solid Waste Bureau. This process typically takes 6 months to a year, so it is important that the City begin the application now. To help the process, Oda provided estimates of some of the basic information for the application in its last report (see the *Solids Handling* section of the report dated July 18, 2024). It has been unclear who the city would seek to prepare and submit this application, but at this point, Oda recommends that this task be delegated to Josh McClenahan at the WWTF. Mr. McClenahan has done some of the preliminary work by contacting the landfill about receiving the city's sludge. Mr. McClenahan should start by contacting the NMED Solid Waste Bureau Permitting and Registration Program at 505-827-0197 or <https://www.env.nm.gov/solid-waste/permitting-and-registration-program/>. A complete application should be submitted as quickly as possible.

SLUDGE TRANSPORT/DISPOSAL PROBLEMS – Several problems exist with the current system of transporting liquid sludge in a tanker truck to the city's sludge disposal site. The first is a recent problem with loading sludge into the truck and sludge leaking into the plant sump system. The second problem is the lack of a way to spread sludge at the disposal site and incorporate it into the soil, which are requirements of both DP-494 and the federal sludge regulations (40 CFR Part 503). These problems, and recommendation to help resolve them, are discussed below:

Sludge Loading Problem: A new problem has come up with loading liquid sludge from the digesters into the transport truck: insufficient head exists to move sludge into the tanker truck and sludge is being discharged back to the plant sump (where it is eventually pumped back into the treatment process). Sludge even spilled from the sump wetwell to the UV enclosure at one point, but work currently being done on the sump pumps should prevent this in the future. The issue appears to be related to the work that was done on the gravity thickener to return it to service. OdA worked with the operators to review the record drawings of the valving on the sludge lines. From that effort, an image from Molzen-Corbin's "Lime Building Modification Plan" was found:



This image is an overlay over an older image of the original piping (much of which is very faint). Please use the actual image (located at the treatment plant) to interpret the recommendations of this section. This image shows the valving associated with the Parkson sludge dewatering unit (now abandoned) and the "loading station pump enclosure". By tracing the piping from the digesters, it is evident that a series of valves must remain closed to avoid discharging sludge to the plant sump and generate sufficient head to load the truck. The three valves identified in the top of the image should remain closed (basically, all the time). The valve identified in the *loading station pump enclosure* should remain closed except when it is used to briefly drain the sludge from the loading line (to avoid spillage) after filling a tanker truck. The last valve identified (to the south of the Parkson unit building) was not found. If this valve is located, it should be kept closed.

If the drawing is reflective of true conditions, keeping these valves closed should allow sludge to be transferred into the tanker truck at the normal rate and should avoid discharging sludge into the plant sump. It is possible that some of the valves were inordinately opened during the recent work performed on the sludge thickener. The valve positions should be verified and maintained in the positions suggested.

Disposal Site Sludge Spreading and Incorporation: Sludge transported to the city's disposal site is regulated under DP-494 and the federal sludge regulations (40 CFR Part 503). DP-494 requires that sludge be spread over the disposal site and the Part 503 requires (among other things) that sludge spread at the site be injected into the soil, incorporated into the soil, or covered with soil within a short period after being spread (typically within 6 hours or by the end of the day...See the *Solids Handling* section of OdA's last report for additional information). The city previously injected liquid sludge at this site using a Terragator® unit, but that unit is inoperable, and repair/replacement is impractical due to cost and other factors. Sludge can still be discharged to this site, but a way must be found to spread and incorporate the sludge shortly after it is placed on the disposal site. In OdA's last report, it was recommended that the city purchase a suitable tractor and disc attachment for this task. In a conversation with Mr. Martinez after the most recent visit, he indicated that around \$80,000 of funding is available now to purchase this equipment.

Purchase Tractor and Discing Equipment: Recommending the purchase of this equipment is somewhat difficult, because if the city can complete the other solids handling effort (to install a fan-press and dispose of sludge to a landfill), the disposal site may not receive much use in the long-term. But without the spreading/discing equipment, the disposal site cannot be used in compliance with DP-494 and Part 503, and having the disposal site option will ensure the city has multiple sludge disposal options over the long run. Therefore, OdA recommends that the WWTF staff prepare a purchase order request for a suitable tractor and disc attachment that can spread and incorporate sludge at the disposal site. A purchase such as this will require three comparable quotes, but this type of agricultural equipment is widely available. Until this equipment is available and functional at the disposal site, sludge disposal at the site should be avoided unless another way to comply with the permit/regulations can be implemented.

POINT OF COMPLIANCE FOR DP-1118

A few issues surrounding the renewal of DP-1118 should be considered by the City before NMED moves forward with drafting the renewal permit. OdA discussed these in its last report but wishes to revisit the Point of Compliance issue due to the discovery of new information.

POINT OF COMPLIANCE – OdA has contended that the advantages of moving the point of compliance for DP-1118 to ***the discharge of the reuse tank*** outweigh the disadvantages. However, during the most recent visit, it became clear (to OdA for the first time) that the chlorine is being added to the effluent when it exits the effluent storage tank, not when it enters. This changes the merits of moving the point of compliance to the outlet of this tank, but OdA believes that changing the system to add chlorine as effluent enters the tank would be relatively easy to change.

New Conduit/Injection Point: By installing a below ground conduit from the existing chlorine pumps to the inlet line to the tank (a distance of around 50 ft) and routing tubing

through the conduit, chlorine could be injected at the inlet of the tank. These photos show the locations involved:



Chlorine Pumps



Effluent Tank Inlet (manhole)

A saddle will need to be installed in the effluent tank inlet piping (located in a manhole). The conduit will need to be routed from inside the building housing the chlorine pumps and buried deep enough to winterize the tubing conveying the chlorine solution to the injection point. The conduit should be properly sized and use only long sweep elbows to ensure that tubing can be pulled through it and replaced when necessary.

FORMALLY REQUESTING A CHANGE TO THE POINT OF COMPLIANCE –

Once the city determines to change the point of compliance, an amendment to the renewal application for DP-1118 should be submitted to NMED. The amendment should propose moving the point of compliance for DP-1118 and should propose an updated effluent sampling plan. Because the effluent tank greatly homogenizes the effluent water quality, NMED may be willing to accept a reduced sampling frequency. OdA recommends proposing a sampling plan as follows:

Parameter	Monitoring Frequency	Notes
Turbidity	Constant (process turbidimeter)	Continuous data logging to determine monthly average and max values.
BOD	1/week, 3-hour composite sample	Composite aliquots collected when transfers are occurring.
<i>E. coli</i>	3/week, grab sample	Samples collected when transfers are occurring
Total Residual Chlorine (TRC)	Grab sample collected when <i>E. coli</i> samples are collected	Samples collected when transfers are occurring
TKN, NO ₃ , TDS, Cl	1/Quarter, grab sample(s)	Samples collected when transfers are occurring
Organic and Inorganic Compounds	1/permit term, 24-hour composite (non-flow-weighted)	Samples collected when transfers are occurring

NMED will consider the city's proposal on moving the point of compliance and altering the sampling plan. If NMED agrees, the new elements will be included in its proposed draft renewal permit.

CONCLUSION

The City of Las Vegas WWTF continues to struggle with solids handling problems and now is dealing with high hydraulic loading issues that resulted from the Hermits Peak/Calf Canyon Fire. The city needs to do everything possible to start a project for the design of a new sludge dewatering unit and should make efforts to manage the hydraulic loads from the water treatment plant effectively.

SITE VISIT CONTACT INFORMATION -

Contact Name	Contact Info	Role
Travis Martinez	Phone: 505-617-1015 Email: tmartinez@lasvegasnm.gov	Utilities Director (Interim), City of Las Vegas
Robert Espinoza	Cell: 505-718-5298 Office: 505-454-3832 Email: respinoza@lasvegasnm.gov	Wastewater Superintendent, City of Las Vegas
Paul Kennedy	Phone: 505-231-2262 Email: paul.kennedy@soudermiller.com	Project Manager, SMA Operations
Alyssa Chavez	Phone: 505-410-6531 Email: alyssa.chavez@smaoperations.com	Laboratory Analyst, SMA Operations
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Andrew Romero	Phone: 505-660-8624 Email: andrewc.romero@state.nm.us	NMED-GWQB Technical Reviewer, DP-1118

NEED FOR ADDITIONAL TRAINING – An additional visit to this site is warranted to assess progress and reevaluate the situation. Until then, OdA will remain available to the operators and City for consultation via videoconference, email, and telephone. A follow up visit will be scheduled to this facility in the 6 – 12 month timeframe.

ACKNOWLEDGEMENT - Robert George wishes to sincerely thank Travis Martinez, Paul Kennedy, Robert Espinoza, and all the facility's personnel for their assistance and engagement during and after the on-site follow-up visit.

DISCLAIMER - The views expressed in this report and recommendations set forth are solely the views and recommendations of Mr. George/OdA. While every effort has been made to ensure that the information contained within this report is accurate, errors and omissions can occur. If you identify an error or omission that significantly impacts the accuracy/validity of this report, please contact OdA to discuss it. If a clear error or omission has occurred, OdA will issue a revised report. Mr. George can be contacted at 1-505-901-7952 or osodelagua@icloud.com.

SITE VISIT PHOTOS



Photo 1: East 2° Clarifier (note sludge blanket level)



Photo 2: Discharge from west (left) and east (right) clarifiers



Photo 3: Sludge spilled from plant sump to UV enclosure



Photo 4: Drying bed nearly ready for cleaning