

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	09/17/2025	
Media Program:	Water	
Regulatory Program(s)	NPDES	
Company Name:	Laguna Development Corporation	
Facility Name:	Rio Puerco Wastewater Treatment Plant (WWTP)/Route 66 Casino	
Facility Physical Location:	Exit 140 @ Interstate 40 (I-40)	
(city, state, zip code)	Pueblo of Laguna, Cibola County, New Mexico	
Mailing address:	14500 Central Avenue SW	
(city, state, zip code)	Albuquerque, New Mexico 87121	
County/Parish:	Bernalillo	
Facility Phone Number	505-463-0873	
Facility Contact:	Glenn Trotter	Level 2 Operator
	gtrotter@POLDC.com	
FRS Number:	110020039359	
Identification/Permit Number:	NM0030686	
Media Identifier Number:	N/A	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Glen Trotter	Casa Blanca/Rio Puerco WWTP	Operator
David A. Esparza	USEPA/6ECDWM	Environmental Engineer
EPA Lead Inspector Signature/Date		
	David Esparza	Date
Supervisor Signature/Date		
	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector David Esparza, PE, arrived at the Laguna Development Corporation (LDC) - Rio Puerco Wastewater Treatment Plant (WWTP)/Route 66 Casino office at approximately 11:00 AM on September 17, 2025, for an unannounced inspection. I met with Mr. Glenn Trotter, presented my credentials, and informed him that this was an EPA inspection to determine Rio Puerco's WWTP compliance under the Clean Water Act (CWA). This compliance evaluation inspection (CEI) was conducted under the authority of the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the CWA. The generation of this report is based on information supplied by Laguna Development representatives, observations made by the United States Environmental Protection Agency (US EPA) inspector, and records and reports maintained by the permittee, and the US EPA.

FACILITY DESCRIPTION

The WWTP is a minor discharger with a design flow capacity of 0.38 MGD (million gallons per day). Pre-Pandemic, the average daily discharge flow was 88,000-gallons per day (gpd). It is currently averaging approximately 70,000-gpd. The facility is located approximately 0.33-miles southeast of the Route 66 Casino Hotel or 1.0 miles southwest of Exit 140 @ U.S. Interstate 40 (I-40), Bernalillo County, New Mexico (depicted in **Aerial Image #1** below). The WWTP facility serves the Casino/Hotel, Recreational Vehicle (RV) Park, and Travel Center and associated administrative buildings. The WWTP is overseen by Level 2 Operator Mr. Glenn Trotter on a 24-hour and 365-day schedule.

A Supervisory Control and Data Acquisition (SCADA) system provides around the clock monitoring of WWTP facility operations, exclusive of the lift stations. The influent is piped through a series of various screens (coarse, grit removal and fine), thence to an anoxic basin for nitrification/denitrification, pre-aeration thence to the membrane bioreactor (MBR) basins. After chlorine disinfection the treated effluent is discharged to an unnamed arroyo, thence to the Rio Puerco. The WWTP sludge was previously processed through the onsite belt press and placed into an approximate 8,000-gallon storage tank. The practice was discontinued during the Pandemic. Currently, Atlas Pumping extracts approximately 3,500-gallons per week from the WWTP MBRs and transports to a disposal facility. The onsite sludge tank is currently not in use. Furthermore, the WWTP continues to maintain a series of evaporative lagoons in the event of an emergency. The WWTP maintains one (1) lift station (LS). The WWTP maintains a backup diesel generator for power that is exercised weekly.



Aerial Image #1: Overall view of the Laguna Development Corporation-Rio Puerco Wastewater Treatment Plant Location. Aerial from Google Earth Maps

Section II - OBSERVATIONS

I observed the following and/or the following information was provided and/or stated:

- The operator (Mr. Trotter) oversees this facility (Rio Puerco) and Casa Blanca WWTP (NM0030678) on an individual employee basis full-time. Additionally, he is responsible for sample collection and operation and maintenance (O&M) associated with both facilities.
- A Supervisory Control and Data Acquisition (SCADA) system provides around the clock monitoring of WWTP facility operations, exclusive of the lift station.
- The onsite 8k gallon sludge tank is currently not in use. Atlas Pumping extracts approximately 3,500-gallons per week from the WWTP MBRs and transports to a disposal facility.
- Effluent totalizing flow meter readings are recorded daily.
- Mr. Trotter stated that a series of evaporative lagoons are maintained in the event of an emergency or system failure.
- The WWTP maintains one (1) lift station (LS).

Section III – AREAS OF CONCERN

A review of the Integrated Compliance Information System (ICIS) database for the period from January 1, 2022, to September 25, 2025 (**Appendix 1**) indicates NPDES permit excursions with respect to Escherichia coli (E coli) (December 31, 2023), Enterococci (December 31, 2022, and December 31, 2023), Mercury (as Total Hg) (December 31, 2024, February 28, 2025, March 31, 2025 and April 30, 2025), Total Dissolved Solids (TDS) (December 31, 2024, March 31, 2025, and June 30, 2025) and Suspended Solids % Removal (December 31, 2023).

Additional Areas of Concern

- The operator (Mr. Trotter) oversees this facility (Rio Puerco) and Casa Blanca WWTP (NM0030678) on an individual employee basis full-time. Additionally, he is responsible for sample collection and operation and maintenance (O&M) associated with both facilities.
- The one (1) lift station located approximately Northwest of the WWTP lacks secure perimeter fencing, a safety gate (beneath the hatchway opening), alarms (either audible or flashing light) or signage.
- The WWTP currently does not de-chlorinate the effluent prior to discharge at Outfall 001.

EPA Region 6 inspector David Esparza. PE conducted a closing conference at Laguna Development Corporation/Rio Puerco WWTP on September 17, 2025, for the inspection.

Section IV- RECOMMENDATIONS

Additional certified facility staff to assist in the day-to-day operations of both facilities and to address potential absence due to illness or personal time off (PTO) issues.

EPA Region 6 inspector David Esparza conducted a closing conference at the Casa Blanca WWTP on September 17, 2025, for the inspection.

Section V – FOLLOW UP

No additional information was received by EPA after exiting the Facility on September 17, 2025.

Section VI – LIST OF APPENDICES

Appendix 1 – Review of the Integrated Compliance Information System (ICIS) Database for the period from January 1, 2022, to September 25, 2025.

Appendix 1

A Review of the Integrated Compliance Information
System (ICIS) Database
for
the period from
January 1, 2022, to September 25, 2025

NM0030686

RIO PUERCO WWTP

Monitoring Period End Date	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value
12/31/2022	Enterococci	30DAVGEO	CFU/10	30.	1210.3
12/31/2023	BOD, 5-day, 20 deg. C	30DA AVG	mg/L	30.	78.
12/31/2023	E. coli	30DAVGEO	CFU/10	47.	632.4
12/31/2023	E. coli	DAILY MX	CFU/10	88.	1553.
12/31/2023	Enterococci	30DAVGEO	CFU/10	30.	2020.
12/31/2023	Solids, suspended percent removal	MO AV MN	%	85.	76.
12/31/2023	Solids, total suspended	30DA AVG	mg/L	30.	35.5
12/31/2024	Mercury, total [as Hg]	DAILY MX	mg/d	1.58	2.3
12/31/2024	Mercury, total [as Hg]	DAILY MX	ug/L	.0011	.0045
12/31/2024	Solids, total dissolved	DAILY MX	mg/L	250.	1700.
02/28/2025	Mercury, total [as Hg]	DAILY MX	mg/d	1.58	2.2
02/28/2025	Mercury, total [as Hg]	DAILY MX	ug/L	.0011	.0022
03/31/2025	Mercury, total [as Hg]	DAILY MX	mg/d	1.58	2.5
03/31/2025	Mercury, total [as Hg]	DAILY MX	ug/L	.0011	.0025
03/31/2025	Solids, total dissolved	DAILY MX	lb/d	792.3	1644.
03/31/2025	Solids, total dissolved	DAILY MX	mg/L	250.	2900.
04/30/2025	Mercury, total [as Hg]	DAILY MX	ug/L	.0011	.013
06/30/2025	Solids, total dissolved	DAILY MX	lb/d	792.3	1577.
06/30/2025	Solids, total dissolved	DAILY MX	mg/L	250.	2200.