EPA United States Environmental Protection Agency

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:	**Casa Blanca Wastewater Treatment Plant (WWTP)**	
Facility Physical Location:	Southeast of the intersection of Interstate 40 (I-40) and Casa Blanca Road (aka Indian Service Route #23)	
(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:	110020039340	
Identification/Permit Number:	NM0030678	
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 Digitally signed by DAVID ESPARZA Date: 2025.10.02 11:58:40 -06'00'	
	David Esparza	Date
Supervisor Signature/Date	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2025.10.02 14:15:28 -05'00'	
	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector David Esparza, PE, arrived at the Casa Blanca Wastewater Treatment Plant (WWTP) operated via contract by the Laguna Development Corporation (LDC) at approximately 8:30 AM on September 17, 2025, for an announced inspection. I met with Mr. Trotter and presented my credentials and informed him that this was an EPA inspection to determine Casa Blanca'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 0.19 MGD (million gallons per day). Pre-Pandemic, the average daily discharge flow was 55k-gallons per day (gpd). It is currently averaging between 35k to 45k gpd. The facility is located approximately 0.30-miles southeast of the intersection of U.S. Interstate 40 (I-40) and Indian Service Route #23, Cibola County, New Mexico (depicted in **Aerial Image #1** below). The WWTP facility serves the Dancing Eagle Casino/administrative buildings, restaurant, high school, senior center, residential area, fire station and travel center. The WWTP is overseen by Level 2 Operator Mr. Glenn Trotter on a 24-hour and 365-day schedule.

Aerial Image #1: Overall view of the Laguna Development Corporation- Casa Blanca Wastewater Treatment Plant location. Note: the evaporative lagoon cells. Aerial from Google Earth Maps.

The treatment works are a Kubota ™ Membrane Bioreactor (MBR) employing two (2) basins with 4 plate cartridges in each basin. The 2 basins operate simultaneously except during brief times when maintenance is being performed on one (1) unit. The combined twin MBR design flow is 0.19 MGD with peak flow capability of 0.38 MGD.

A Supervisory Control and Data Acquisition (SCADA) system provides around the clock monitoring of WWTP operations. The influent is piped using three (3) lift stations (LS) (**Table 1** below) through an automated fine screen, thence into a single anoxic tank under constant mixing. Wastewater then enters an aerated tank via gravity flow, thence continues to the MBR basins. The mixed liquor suspended solids from the MBR basins is returned to the anoxic tank, thence the treated permeate is gravity flowed through the storage tank to the outfall structure, with chlorine injection on the outlet side.

Se Table 1 Casa Blanca Lift Stations

Name	Location	Comment
WWTP #1	Northwest corner inside WWTP fenced perimeter	Vault (concrete) was replaced, and LS was serviced circa early 2020. Locked hatchway w/ safety gate.
WWTP #2	North outside of WWTP fenced perimeter	Vault (concrete) was replaced, and LS was serviced circa early 2020. Locked hatchway w/ safety gate. Lacks secure perimeter fencing, alarms (either audible or flashing light) or signage.
Burger King	West side of drive-thru next to building	Vaults were cleaned, serviced and new pumps were installed circa early 2020. New electrical upgrades are planned.

Waste sludge is drawn from the recycle line and placed into a series of five (5) lined aerated lagoons for extended treatment. All pumps, blowers and the entire facility have a backup generator arranged to automatically run as required.

The disinfected effluent is discharged through Outfall 001 to Acoma Creek (Latitude 35° 01' 37" North and Longitude 107° 28' 11" West), thence to the Rio San Jose. The Rio San Jose is a perennial stream. It becomes intermittent when flow is diverted during the growing season for irrigation water within the village jurisdictions. The flow in the lower reaches of the Rio San Jose below the Highland Meadows area flows year-round to its convergence with the Rio Puerco between the Pueblos of Laguna and Isleta.

Section II - OBSERVATIONS

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

- The operator (Mr. Trotter) oversees this facility Casa Blanca WWTP (NM0030678) and Rio Puerco WWTP (NM0030686) on an individual employee basis full-time. These two (2) facilities are located approximately 30-miles apart. 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 operations.

- Effluent totalizing flow meter readings are recorded daily.

- The WWTP maintains three (3) lift station (LS) (**Table 1** above).

- The WWTP currently utilizes sodium bisulfite for de-chlorination of the effluent prior to discharge at Outfall 001.

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) (February 29, 2024, March 31, 2024 and May 31, 2024), Enterococci (December 31, 2022, February 29, 2024, March 31, 2024 and May 31, 2024), and Total Dissolved Solids (TSS) (December 31, 2024, March 31, 2025, and June 30, 2025).

Additional Areas of Concern

- The operator (Mr. Trotter) oversees this facility Casa Blanca WWTP (NM0030678) and Rio Puerco (NM0030686) on an individual employee basis full-time 24-hour per day 365 days per year.

- Additionally, he is responsible for sample collection and operation and maintenance (O&M) associated with both facilities.

- Lift Station WWTP#2 located approximately North and outside the fenced perimeter lacks secure perimeter fencing, alarms (either audible or flashing light) or signage.

- Lift Station-Burger King located within the restaurant drive-thru lacks ready access for servicing and/or routine maintenance.

Section IV- RECOMMENDATIONS

1. 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 IV – FOLLOW UP

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

Section V – 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

NM0030678

CASA BLANCA 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
02/29/2024	E. coli	30DAVGEO	CFU/10	47.	114.4
02/29/2024	E. coli	DAILY MX	CFU/10	88.	185.
02/29/2024	Enterococci	30DAVGEO	CFU/10	30.	620.5
03/31/2024	E. coli	30DAVGEO	CFU/10	47.	112.2
03/31/2024	E. coli	DAILY MX	CFU/10	88.	816.4
03/31/2024	Enterococci	30DAVGEO	CFU/10	30.	243.
05/31/2024	E. coli	DAILY MX	CFU/10	88.	199.3
05/31/2024	Enterococci	30DAVGEO	CFU/10	30.	49.1
12/31/2024	Solids, total dissolved	DAILY MX	lb/d	792.3	806.
12/31/2024	Solids, total dissolved	DAILY MX	mg/L	250.	2300.
03/31/2025	Solids, total dissolved	DAILY MX	mg/L	250.	2100.
06/30/2025	Solids, total dissolved	DAILY MX	mg/L	250.	2300.