

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	09/13/2022	
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 (505-463-0873)	
FRS Number:	110020039359	
Identification/Permit Number:	NM0030686	
Media Identifier Number:	NA	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Glenn 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: 2022.10.11 14:49:48 -06'00'	
	David A. Esparza	Date
Supervisor Signature/Date	Bernier, Roberto Digitally signed by Bernier, Roberto Date: 2022.10.11 18:10:10 -05'00'	
	Robert 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 (hereinafter referred to as Rio Puerco WWTP) office at approximately 2:00 PM on September 13, 2022, 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 65,000-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 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 (Trotter) 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 stations.
- 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 ICIS database for the period from November 19, 2019, to September 13, 2022 (**Appendix 2**) indicates NPDES permit excursions.

- NPDES permit excursion- Biochemical Oxygen Demand- 5 day (BOD₅) (percent removal)- December 31, 2019
- NPDES permit excursion- Suspended Solids (percent removal)- November 30, 2020.

Additional Area 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 (Trotter) 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 inspectors David Esparza. PE conducted a closing conference at Laguna Development Corporation/Rio Puerco WWTP on September 13, 2022, 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.
- Pursuant to the discussion with Mr. Trotter regarding types of disinfection, sampling equipment and given his time constraints operating both systems. It might be beneficial for LDC to research acquisition and installation of an ultraviolet (UV) disinfection system in conjunction with an automatic sampling unit.
- Installation of secure perimeter fencing, a safety gate (beneath the hatchway opening), alarms (either audible or flashing light) or signage at the lift station.

Section IV – FOLLOW UP

No additional information was received by EPA after exiting the Facility on September 13, 2022.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 7 photos taken 09/13/2022

Appendix 2 – Review of the Integrated Compliance Information System (ICIS) Database for
the period from November 19, 2019, to September 13, 2022

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Laguna Development Corporation / Rio Puerco WWTP/Route 66 Casino WWTP		
City: Pueblo of Laguna	County/Parish: Bernalillo	State: New Mexico



Overall view of the Casa Blanca membrane bioreactor (MBR) basin #2. (DSCN1662). September 13, 2022.
Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Laguna Development Corporation / Rio Puerco WWTP/Route 66 Casino WWTP		
City: Pueblo of Laguna	County/Parish: Bernalillo	State: New Mexico



Replacement membrane cartridges awaiting installation. (IMG0143). September 13, 2022.
Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Laguna Development Corporation / Rio Puerco WWTP/Route 66 Casino WWTP		
City: Pueblo of Laguna	County/Parish: Bernalillo	State: New Mexico



View of two (2) of the three (3) WWTP blowers. Note: one (1) blower required extensive repair after catching fire. (IMG0147). September 13, 2022. Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Laguna Development Corporation / Rio Puerco WWTP/Route 66 Casino WWTP		
City: Pueblo of Laguna	County/Parish: Bernalillo	State: New Mexico



Overall view of the WWTPs permeate pumps. (IMG0148). September 13, 2022. Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Laguna Development Corporation / Rio Puerco WWTP/Route 66 Casino WWTP		
City: Pueblo of Laguna	County/Parish: Bernalillo	State: New Mexico



View of the bulk Sodium Bisulfite solution and peristaltic pump used in the treatment process. (IMG0149). September 13, 2022. Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Laguna Development Corporation / Rio Puerco WWTP/Route 66 Casino WWTP		
City: Pueblo of Laguna	County/Parish: Bernalillo	State: New Mexico



View of the onsite 8k gallon sludge tank currently not in use. Atlas Pumping extracts approximately 3.5k gallons per week from the WWTP MBRs and transports to a disposal facility. (IMG0153). September 13, 2022. Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Laguna Development Corporation / Rio Puerco WWTP/Route 66 Casino WWTP		
City: Pueblo of Laguna	County/Parish: Bernalillo	State: New Mexico



View of the one (1) lift station (LS) located approximately Northwest of the WWTP. Note: The LS lacks secure perimeter fencing, a safety gate (beneath the hatchway opening), alarms (either audible or flashing light) or signage (IMG0154). September 13, 2022. Photographed by D. Esparza

Appendix 2

A Review of the Integrated Compliance Information
System (ICIS) Database
for
the period from
November 19, 2019, to September 13, 2022

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Related NPDES Violations

ADD SINGLE EVENT VIOLATION

List of Violations Related to the Permit

Record Numbers 1 to 40

Violation Type	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Action
Schedule Violation	2 P QUMTR Quarterly Monitoring Report	C40	03/30/2022	N-04/30/2022	1-04/30/2022	
Schedule Violation	2 P QUMTR Quarterly Monitoring Report	C40	06/30/2022	N-07/31/2022	1-07/31/2022	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 Q1	D90	11/30/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 Q2	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C2	D90	11/30/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C3	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00400 pH Effluent Gross Season ID:0 C1	D90	11/30/2019			
DMR Non-Receipt Violation	001 A 00400 pH Effluent Gross Season ID:0 C3	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 Q1	D90	11/30/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 Q2	D90	11/30/2019	K-02/28/2020	2-05/05/2020	

Violation Type	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Action
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 C2	D90	11/30/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 C3	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q1	D80	11/30/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q2	D80	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 50060 Chlorine, total residual Disinfection, Process Complete Season ID:0 C3	D80	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C2	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C3	D90	11/30/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 71900 Mercury, total [as Hg] Effluent Gross Season ID:0 C2	D80	11/30/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 81010 BOD, 5-day, percent removal Effluent Gross Season ID:0 C1	D90	11/30/2019			
DMR Non-Receipt Violation	001 A 81011 Solids, suspended percent removal Effluent Gross Season ID:0 C1	D90	11/30/2019			
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 Q1	D90	12/31/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 Q2	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C2	D90	12/31/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00310 BOD, 5-day, 20 deg. C Effluent Gross Season ID:0 C3	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00400 pH Effluent Gross Season ID:0 C1	D90	12/31/2019			

Violation Type	Violation Information	Violation Code	Violation Date	RNC Detection Code-Date	RNC Resolution Code-Date	Action
DMR Non-Receipt Violation	001 A 00400 pH Effluent Gross Season ID:0 C3	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 Q1	D90	12/31/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 Q2	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 C2	D90	12/31/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 00530 Solids, total suspended Effluent Gross Season ID:0 C3	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q1	D80	12/31/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 50050 Flow, in conduit or thru treatment plant Effluent Gross Season ID:0 Q2	D80	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 50060 Chlorine, total residual Disinfection, Process Complete Season ID:0 C3	D80	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C2	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 51040 E. coli Effluent Gross Season ID:0 C3	D90	12/31/2019	K-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 71900 Mercury, total [as Hg] Effluent Gross Season ID:0 C2	D80	12/31/2019	N-02/28/2020	2-05/05/2020	
DMR Non-Receipt Violation	001 A 81010 BOD, 5-day, percent removal Effluent Gross Season ID:0 C1	D90	12/31/2019			
DMR Non-Receipt Violation	001 A 81011 Solids, suspended percent removal Effluent Gross Season ID:0 C1	D90	12/31/2019			
DMR Non-Receipt Violation	001 Q 70295 Solids, total dissolved Effluent Gross Season ID:0 C3	D80	12/31/2019	K-02/28/2020	2-05/05/2020	
Effluent Violation	001 A 81011 Solids, suspended percent removal Effluent Gross Season ID:0 C1	E90	11/30/2020			

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