

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	02/28/2023	
Media Program:	Water	
Regulatory Program(s)	CWA – NPDES	
Company Name:	City of Las Cruces/ Las Cruces Utilities	
Facility Name:	East Mesa Water Reclamation Facility	
Facility Physical Location:	5150 E Lohman Ave.	
(city, state, zip code)	Las Cruces, NM 88005	
Mailing address:	P.O. Box 20000	
(city, state, zip code)	Las Cruces, NM 88005	
County/Parish:	Doña Ana County	
Facility Phone Number	575-541-2000	
Facility Contact:	Laura Montoya	Deputy Director Wastewater
	lamontoya@las-cruces.org	
FRS Number:	110042387459	
Identification/Permit Number:	NM0030872	
Media Identifier Number:		
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
<i>Name</i>	<i>Affiliation/mailcode</i>	<i>Title</i>
Amy Andrews, P.E.	USEPA/6EN-WMH	Inspector / Environmental Engineer
Jason Martinez	NMED/SWQB	Inspector / Environmental Specialist
Laura Montoya	Deputy Director Wastewater	City of Las Cruces
Joaquin Murillo	Acting Plant Manager	City of Las Cruces
Jordan Kirkham	Wastewater Treatment Plant Crew Leader	City of Las Cruces
Steven Perez	Regulatory Compliance Analyst	City of Las Cruces
Jerry Flores	Operator	City of Las Cruces
Gregorio Uranga	Operator	City of Las Cruces
EPA Lead Inspector Signature/Date	AMY ANDREWS Digitally signed by AMY ANDREWS DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=AMY ANDREWS, 0.9.2342.19200300.100.1.1=68001003655888 Date: 2023.04.27 15:54:31 -06'00'	
	Amy Andrews	Date
Supervisor Signature/Date	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2023.04.28 07:15:54 -05'00'	
	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

Environmental Protection Agency (EPA) Region 6 inspector, Amy Andrews, and New Mexico Environment Department (NMED) Surface Water Quality (SWQB) inspector, Jason Martinez, arrived at the City of Las Cruces, East Mesa Water Reclamation Facility (WRF) at 1:50 PM on February 28, 2023 for an unannounced inspection. We met with the personnel listed in the table on Page 1. I presented my credentials to Ms. Montoya and informed her that this was an EPA inspection to determine compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act (CWA). The inspection was conducted under the authority of the NPDES permit program, in accordance with the Federal CWA. This report is based on information supplied by City of Las Cruces representatives (the permittee), observations made by the EPA inspector, and records and reports maintained by the permittee and the EPA.

FACILITY DESCRIPTION

The East Mesa WRF is classified as a major industrial discharger under the CWA, Section 402, of the NPDES permit program and is authorized to discharge up to 1.0 million gallons per day (MGD) based on design flow, but discharge is primarily used as reuse water. Influent flow rates to the plant average around 0.3 to 0.4 MGD. Discharge (when it occurs) is to a receiving water named South Fork Las Cruces Arroyo, an intermittent stream, and thence to the Rio Grande River in waterbody segment 20.6.4.98 (NMAC, State of New Mexico Standards for Interstate and Intrastate Surface Waters) of the Rio Grande Basin. This segment includes the designated uses of livestock watering, wildlife habitat, marginal warmwater aquatic life and primary contact.

The collection system allows domestic wastewater from the east mesa side of Las Cruces, including the Mountain View Regional Medical Center, to be directed to the East Mesa Water Reclamation Facility via two of the city's lift stations. The collection system also allows for influent to be redirected to the Jacob Hands WWTP in an emergency. A regulating lift station provides an average influent flow of 0.5 MGD to the influent of two parallel Aero-Mod Sequox Treatment systems. Influent enters a drum screen and spray wash. Screenings are deposited in a municipal dumpster for land fill disposal. Two twin trains present a selector tank followed by two first stage aeration tanks. A "block out" can direct flow to secondary aeration basins. Solids are airlifted to twin digester tanks. Return activated sludge is airlifted back to aeration tanks. Following clarification, flows are collected and sent via weir to a cloth disc filter drum unit where solids are backwashed and returned to the works influent. Flows continue over multiple weirs and finally to the ultraviolet (UV) unit for disinfection. Chlorination is available for supplemental/backup disinfection or in the event of partial or full UV servicing or failure. All flow metering and compliance testing are conducted at designated outfall 001. Discharge is approximately 0.45 MGD of Class A reclaimed water and utilized for irrigation or discharged to South Fork Arroyo at outfall 001. Biosolids at approximately 80% moisture content are transported via tanker truck for additional digestion at the Jacob Hands Wastewater Treatment Facility. All facility biosolids are then dewatered with a belt press and transported to West Mesa Composting facility.

Section II – OBSERVATIONS

At the opening meeting introductions were made and the inspection objectives were discussed. I provided a document request list of documents and information to be reviewed as part of the inspection. Facility personnel provided a description of the operational processes of the facility and described operational challenges that had been encountered recently.

After the opening meeting, we toured the WWTP. The facility was clean with no obvious operational issues. All treatment units were operational at the time of the inspection. Facility personnel stated that the effluent from this facility is primarily used as reuse water to water the parks, golf course, high school fields, and the local landfill. Additional observations made during the tour include the following:

- Grit collected at the headworks is picked up by city trash collection and taken to the Corralitos Landfill, which is located outside of the City of Las Cruces.
- Recently operators have been adding a small amount of chlorine to the plant just before the disk filters to help reduce algae.
- Flow after the UV disinfection goes to a wet well and then is pumped to the reuse water tower. If the pumps in the wet well lost power, then the water would fill the wet well and flow out the overflow pipe to the NPDES outfall.
- The flow meter to the NPDES outfall is a closed-pipe transducer (see Photo Log).
- Current planned plant upgrades to the UV system will increase the plant flow capacity above the current 0.3 to 0.4 MGD, but will not exceed 1.0 MGD.
- The only recent discharge to the NPDES outfall was during January 2023. Facility documentation shows that 59,151 gallons were discharged to the outfall on 01/05/2023. It's not clear if there is an alarm on the SCADA system to notify operators that the discharge is taking place. personnel report that the volume was too small to collect a sample.

Even though no NPDES compliance samples have been collected recently, the facility does still collect samples for their NMED groundwater permit, and facility personnel state that they are prepared to collect an NPDES sample if the need arises. Samples go to the laboratory at the Jacob Hands Wastewater Treatment Facility.

Section III – AREAS OF CONCERN

No areas of concern were observed at the time of the inspection.

Section IV – CLOSING CONFERENCE

EPA Region 6 inspector, Amy Andrews, conducted a closing conference at the City of Las Cruces East Mesa WRF at 3:00 PM on 02/28/2023 for the inspection. During the closing conference, inspectors discussed observations made during the inspection and noted that there were no observed Areas of Concern.

Section V – FOLLOW UP

Documents requested by the inspector during the inspection were received by EPA via email on 03/03/2023 through 03/07/2023, after exiting the Facility on 02/28/2023.

Section VI – LIST OF APPENDICES

Appendix 1 – Photograph Log – 1 photo taken 02/28/2023

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: City of Las Cruces East Mesa Water Reclamation Facility		
City: Las Cruces	County: Doña Ana County	State: New Mexico



Photo File Name: DSCN1679.JPG

Date of Photo: 02/28/2023

Time of Photo: 12:49 PM

Photographer: Amy Andrews

Description: View into manhole showing pipe to the NPDES outfall and outfall flow meter.