

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	09/03/2025	
Media Program:	Water	
Regulatory Program(s)	NPDES	
Company Name:	City of Santa Fe	
Facility Name:	Santa Fe Wastewater Treatment Plant	
Facility Physical Location:	73 Paseo Real	
(city, state, zip code)	Santa Fe, New Mexico 87507	
Mailing address:	73 Paseo Real	
(city, state, zip code)	Santa Fe, New Mexico 87507	
County/Parish:	Santa Fe	
Facility Phone Number	505-955-4642	
Facility Contact:	Michael Dozier	Wastewater Management Division Director
	mldozier@santafenm.gov	
FRS Number:	110064609044	
Identification/Permit Number:	NM0022292	
Media Identifier Number:	N/A	
NAICS:	221320	
SIC:	4952	
Personnel participating in inspection:		
Jesse Roach	City of Santa Fe	Interim Utility Department Director
Leroy Alvarado	City of Santa Fe	Operations Superintendent
Michael Dozier	City of Santa Fe	Wastewater Management Division Director
David Esparza	EPA-R6/ECDWM	Environmental Engineer
EPA Lead Inspector Signature/Date	DAVID ESPARZA Digitally signed by DAVID ESPARZA David Esparza Date: 2025.10.28 15:10:07 -06'00'	
Supervisor Signature/Date	For	Date
	Roberto Bernier	

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector David Esparza, PE, arrived at the City of Santa Fe Wastewater Treatment Plant (WWTP) at approximately 1:00 PM on September 3, 2025, for an announced inspection. I met with Mr. Michael Dozier, Wastewater Management Division Director, Mr. Jesse Roach, Interim Utility Department Director and Mr. Leroy Alvarado, Operations Superintendent Utilities Director, I presented my credentials and informed them that this was an EPA inspection to determine the WWTP's 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 Santa Fe representatives, observations made by the United States Environmental Protection Agency (US EPA) inspector, and records and reports maintained by the permittee (Santa Fe), and the US EPA. Before leaving the facility on September 3, 2025, an exit briefing was held with Mr. Dozier, Mr. Roach and Mr. Alvarado, to explain and discuss the Capacity Management Operations and Maintenance (CMOM) checklist forwarded via electronic mail (email) earlier in our discussion (**Appendix 1** Capacity Management Operations and Maintenance Self-Assessment).

FACILITY DESCRIPTION

The WWTP is a major discharger with a design flow of 13 million gallons per day (MGD), inclusive of an average daily flow of 4.7 MGD, and is located at 73 Paseo Real or approximately 3/4-miles west of the Veterans Memorial Highway (also identified as NM-599N), Santa Fe County, New Mexico (depicted in Aerial Image #1 below). The WWTP serves a population of approximately 90,000 residents, but during the summer months, Santa Fe becomes a tourist destination, which increases the flow to the WWTP. The WWTP is operated by staff within the Wastewater Management Division of the Public Utilities Department on a 24-hour per day, 7 days per week basis.

The city owns the Canyon Road lift station (LS) but cleans all 5 LSs once a month (Identified in **Table 1** below). The Aldea and Monte Sereno Homeowners Associations (HOA), respectively own and are responsible for all repairs and any issues that arise at these LSs.

Table 1: City of Santa Fe Lift Stations

	Lift Station	Address	Capacity (gallons)
1	Canyon Road	1519 Canyon Road	1,391
2	Aldea 1 Station 41	Camino De Vecinos Road	7,517
3	Aldea 2 Station 121	Avenida Frijoles	2,242
4	Monte Sereno 1	Valle Sereno/Tesuque Overlook	3,755
5	Monte Sereno 2	Opera Drive/Village Drive	6,201

Various components are utilized in the removal of larger debris collected in the influent prior to entry at the headworks. The fine screen type bar screen can be operated by either a flow actuated device or by timer, wherein the significant purpose is the removal of cans, plastic products, paper, rags and other things too large to pass through the finer screen. These larger items are fed into the rag press, where most

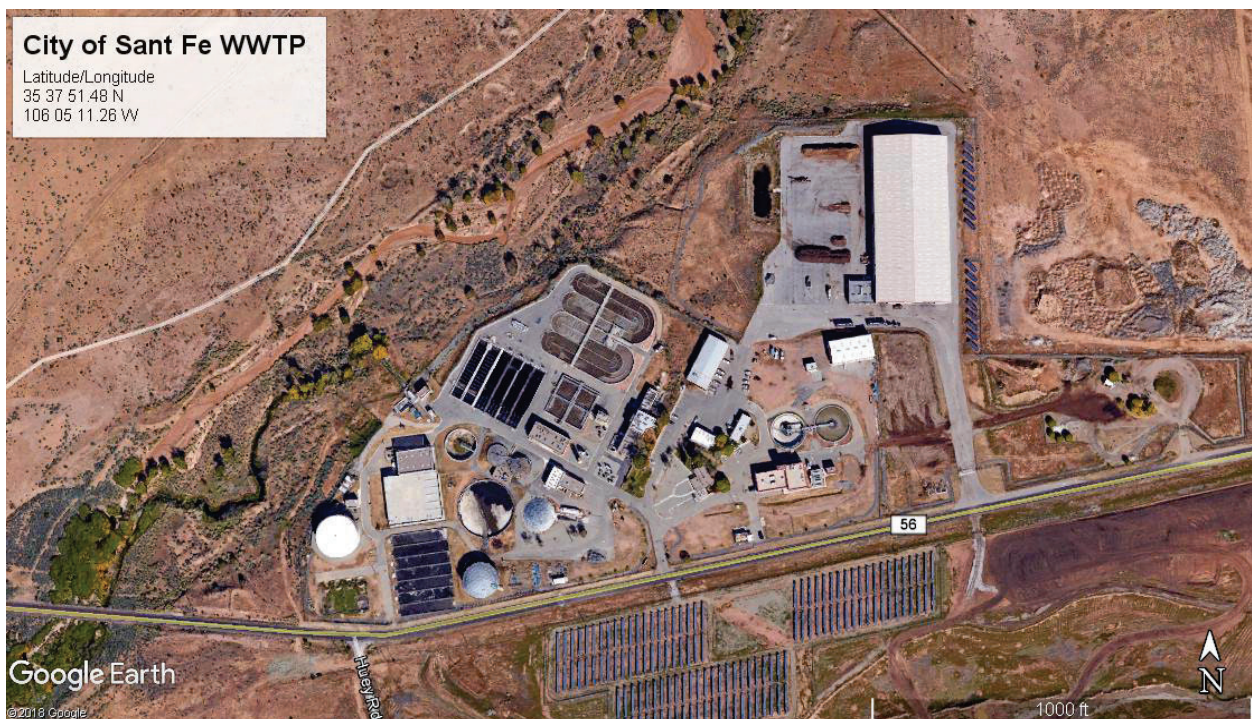
of the moisture is reduced by compression, and discharged to the dumpsters. Vagrant rocks are manually collected ahead of the bar screen. The remaining influent continues to two wet wells.

The grit removal system consists of a grit tank, where flows are aerated to allow inorganic waste to settle while allowing organics to float and pass through to a wet well. The contents of the grit tank are pumped back to the grit separator, washed to remove the organic matter, and with the help of an auger is fed onto a conveyor belt, thence dropped into a dumpster for disposal.

Flows from the wet well enter two (2) approximate 600,000-gallon primary clarifiers via a splitter box. The velocity is reduced in the clarifiers to allow heavier organics to settle and be removed by a scraper. The lighter material floating on the top is removed by a skimmer arm and the solids at of the clarifier are pumped to the digester.

Wastewater continues from the primary clarifier to one of two aeration basins for aerobic treatment.

After the aeration basins, the secondary clarifiers flow enters filtration at the disc filters and sand filters wherein, the WWTP utilizes Ultra-violet light to disinfect the treated effluent prior to discharging to Outfall 001 and into the receiving waters; Santa Fe River.



Aerial Image #1- City of Santa Fe Wastewater Treatment Plant

Currently there are three (3) Industrial User's (IU) (Listed in **Table 2** below) contributing to the WWTP and all of which are required to adhere to Santa Fe's Ordinance Chapter XXII – Sewers: §22-9 Industrial Pretreatment Regulations and Procedures, and §22-10 Wastewater Extra-Strength Surcharge Program.

Table 2- City of Santa Fe Significant Industrial Users

Industrial Username	Location
Esoterix (Laboratory Corporation)	2000 Vivigen Way
New Mexico History Museum	113 Lincoln Avenue
Christus St. Vincent Regional Medical Center	455 St. Michaels Drive

SOLIDS:

The DAF (dissolved air flotation) is used to thicken the sludge by pressurizing water, above atmospheric pressure, inclusive of an added polymer prior to introduction to a header. The thickened solids are then handled either by anaerobic sludge digestion or lime stabilization.

After the sludge has been treated, onsite storage is available prior to disposal or surface injection into the adjacent field (located south of the WWTP). The WWTP employs composting to reduce their sludge injection. After mechanically processing and mixing with wood chips/hay the composted sludge is stockpiled for a period up to 60-days prior to any sales to the public.

RE-USE:

Some treated and disinfected domestic wastewater is used (sold) periodically at the Santa Fe Country Club, the Santa Fe Municipal Recreation Complex and the Marty Sanchez Golf Club for landscape irrigation

Section II - OBSERVATIONS

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

- A review of the City of Santa Fe's completed CMOM Self-Assessment: **General Information** (page 2)- indicates an average daily flow of 4.7 MGD of the design capacity 13 MGD.
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Collection System Information** (page 3)- indicates 5 lift or pump stations, and an approximate service area of 50 square miles. Further discussion regarding the CMOM indicates that 25% of the total piping, equates to 25-years old, 35% as 26-years to 50 years old, 35% as 51-years to 75-years old and 10% as greater than 75-years old. The CMOM further states 18% of the piping is constructed of prestressed concrete cylinder pipe (PCCP), 5.2% as high-density polyethylene (HDPE), 0.6% as reinforced concrete pipe (RCP), 43.3% as polyvinyl chloride (PVC), inclusive of 0.9% for force mains and 3.5% for vacuum, 21.4% as vitrified clay pipe (VCP) and 0.6% as cast iron pipe (CIP).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Engineering Design (ED)** (page 5)- indicates new manholes are not tested for inflow and infiltration (**§ED-06**).

- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Satellite Communities and Sewer Use Ordinance (SUO)** (page 6)- indicates the agreements do not have a date of termination or allow for renewal under different terms (§SUO-05).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Organizational Structure (OC)** (page 8)- indicates performance measures or promotion potential are not discussed in the job descriptions (§OC-03), 35% of current staffing positions are vacant (§OC-04). **Note:** based on the submitted staffing chart this equates to approximately 23 full-time equivalent positions. The length of time, non-level operators and administrative staff tend to be refilled within 6 months. Licensed operators tend to be harder to fill and can take 10 to 24 months (§OC-05), and that 20% of the utility work is currently contracted out as most high priority repairs and scheduled rehab projects are being completed through on-call contracts. 2 contracted level 4 operators are currently covering 1 shift in a 4-shift circulation at the treatment plant (§OC-06).
- A review of the City of Santa Fe's completed Self-Assessment: **Internal Communications (IC)** (page 9) indicates performance reviews are not currently conducted (§IC-05).
- A review of the City of Santa Fe's completed Self-Assessment: **Training (TR)** (page 12 and page 13) indicates the utility is in the process of building a program (§TR-01), however does not provide training in routine line maintenance, record keeping, electrical and instrumentation, pipe repair, bursting / CIPP (cured-in-place pipe), public relations or CCTV (closed-circuit television) and trench/shoring (§TR-05). Additionally, the completed CMOM indicates on-the-job training progress and performance measures are not measured (§TR-08). Furthermore, the CMOM indicates current employees are generally all trained on the job (45%), manufacturer training (20%), in-house training (20%) and industry-wide training (15%). In 2024 modules were built for facility specific classroom training, while industry wide and manufacturer training only make up a small portion of training (§TR-10).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Safety (SAF)** (page 13 and page 14) does not indicate the utility has a safety committee (§SAF-03). It is also stated the utility does not hold or conduct regular safety meetings (§SAF-04) though the city has a safety department that holds safety trainings and meetings, and the program is structured for all city departments and is not dedicated to utilities alone (§SAF-05). Additionally, the utility does not have written procedures for lockout/tagout, material safety data sheets (MSDS), chemical handling, confined spaces permit programs, trenching and excavations safety, biological hazards in wastewater, traffic control and work site safety, electrical and mechanical systems, pneumatic and hydraulic system safety (§SAF-07). What is stated is trainings are conducted periodically for all the above but no current written procedures for the department. Of significance the utility experienced 4 injuries and 4 days of lost time in 2024 (§SAF-08). Additionally, the utility states the following equipment items are not available or inadequate-supply 5-minute escape breathing devices, respirators and/or self-contained breathing apparatus (§SAF-09).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Customer Service (CS)** (page 15 and page 16) does not indicate the utility has a customer service and public relations program but, a new division focused on conservation and sustainability. This new division will assist in outreach and presentations (§CS-01). The utility also indicates employees are not specifically trained in customer service (§CS-03), or is sample correspondence, Q/A's, or "scripts" to help guide staff through written

or oral responses to customers (§CS-04) or is customer service evaluation program to obtain feedback from the community in place (§CS-08).

- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Equipment & Collection System Maintenance (ESM)** (page 17 and page 18) indicates the utility does not maintain maintenance schedule records (§ESM-02), dated tags are not used to show out-of-service equipment (§ESM-03), and corrective repair work orders are not backlogged more than six months (§ESM-06).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Equipment Parts Inventory (EPI)** (page 18) indicates the utility does not have a parts standardization policy in place (§EPI-03), does not maintain a stock of spare parts on its maintenance vehicles but most spare parts are stocked in the warehouse and issued to operators upon request (§EPI-05).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Management Information System (MIS)** (page 19 and page 20) indicates there are not written instructions for managing and tracking scheduled system inventory, but the city has purchased software and services to implement CMMS/MIS and estimates it will be online in mid-2026 (§MIS-01). Additionally, it appears there is not written instructions for managing and tracking the following complaint work orders, customer service, scheduled preventive maintenance, scheduled inspections, scheduled system inventory, scheduled monitoring/sampling, compliance/overflow tracking, equipment/tools tracking or parts inventory (§MIS-04). Furthermore, it is stated when fully implemented the CMMS system will be instantaneously updated from tablets or cell phone (§MIS-06).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **System Mapping (MAP)** (page 21 and page 22) indicates the System Mapping does not record the following location of buildings, SSO occurrences, flow monitors, easement lines and dimensions or slope (§MAP-04). Also, that separate sewer attributes are not recorded (§MAP-05).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Internal TV Inspection (TVI)** (page 23) indicates the utility does not have a standardization pipeline condition assessment program (§TVI-01). Furthermore, a rating system is not used to determine the severity of the defects found during the inspection process (§TVI-05), though the total defects determined by TV inspection, during the past 5, years were attributed to the following: debris/grease/roots, intruding tap/roots, offset joint/grease, and line failure were not identified (§TVI-07).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Manhole Inspection and Assessment (MAN)** (page 26) indicates the city does not have routine manhole inspection and assessment program due to lack of staff (§MAN-01), or a grouting program (§MAN-06).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Pump Stations (PS)** (page 27) indicates the city does not have an emergency operating procedure for each pump station (§PS-03), and there is not a procedure for manipulating pump operations during wet weather to increase in-line storage of wet weather flows (§PS-07). Additionally, the manuals that contain the manufacturers recommended maintenance schedules for all pump station equipment are not available (§PS-11).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Capacity Assessment (CA)**

(page 29 thru page 31) indicates that the city does not have a flow monitoring program (§CA-01), a tool (hydraulic model, spreadsheet, etc.) for assessing whether adequate capacity exists in the sewer system (§CA-04) or maintain any rain gauges (§CA-12).

- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Tracking SSOs (TRK)** (page 31 and page 32) indicates the city, has reported 62 sanitary sewer overflow events (SSO) in the past 5 years (§TRK-01) and approximately 90% of the events amounted to less than 1,000-gallons (§TRK-02). Most of the events being manholes (70%) (approximately 6,833 of the total 9,761 reported manholes) and main/trunk sewers (30%) (§TRK-06). It is further stated most of the events were caused by debris/roots (§TRK-07). Additional aspects that were identified are chronic locations (§TRK-08), the locations not being monitored for sufficient capacity and/or structural condition (§TRK-09), or prior to collapse, the structurally deteriorating pipelines are not monitored for renewal or replacement (§TRK-10).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Overflow Emergency Response (OERP)** (page 34 and page 35) indicates the city does not have a documented OERP available for utility staff to use (§OERP-01). Additionally, it is not clear if specific responsibilities for personnel who respond to emergencies are detailed (§OERP-03), or does it have a public notification plan (§OERP-08).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Smoke & Dye Testing (SDT)** (page 36 and page 37) indicates the city does not have a smoke testing program to identify sources of inflow and infiltration (§SDT-01), a smoke testing program to identify sources of inflow and infiltration in house laterals (private service laterals) (§SDT-01B), written procedures for smoke testing (§SDT-02), a procedure for isolating line segments (§SDT-03), a procedure for notifying residents that smoke testing will be conducted in their area (§SDT-04), a dye testing program (§SDT-10), or written procedures for dye testing (§SDT-11).
- A review of the City of Santa Fe's completed CMOM Self-Assessment: **Hydrogen Sulfide Monitoring and Control (HSMC)** (page 38 and page 39) indicates the city does not have a corrosion control program (§HSMC-02), procedures for application of chemicals (§HSMC-04), methods used for hydrogen sulfide control- aeration, iron salts, enzymes, activated charcoal canisters, chlorine, sodium hydroxide, hydrogen peroxide, potassium permanganate, or biofiltration (§HSMC-08), or contain air relief valves at the high points of the force main system (§HSMC-09).

During the closing conference, David Esparza discussed the requested completion of the Capacity, Management, Operation and Maintenance (CMOM) Self-Assessment document.

Section III – AREAS OF CONCERN/RECOMMENDATIONS

A review of the of the CMOM self-assessment completed by the City of Santa Fe's, and additional supporting information, indicates some of the following or could be beneficial:

- Preparation of a Satellite Communities and Sewer Use Ordinance (SUO) agreements defining a date of termination or an allowance for renewal under different terms.

- Preparation of an Organizational Structure (OC) defining performance measures or promotion potential in the job descriptions. Implement a mechanism for performance reviews.
- Preparation of a training program specially related to routine line maintenance, record keeping, electrical and instrumentation, pipe repair, bursting / CIPP (cured-in-place pipe), public relations or CCTV (closed-circuit television) and trench/shoring.
- Preparation of an Equipment & Collection System Maintenance protocol identifying maintenance schedule records, dated tags are not used to show out-of-service equipment, and corrective repair work orders are not backlogged more than six months. This could include an Equipment Parts Inventory (EPI) standardization policy in place. Given the recent experiences of supply chain delays, it is paramount to day-to-day operations and permit compliance.
- A review of the City of Santa Fe's completed CMOM Self-Assessment indicates the city, has reported 62 sanitary sewer overflow events (SSO) in the past 5 years and approximately 90% of the events amounted to less than 1,000-gallons. Most of the events being manholes (70%) (approximately 6,833 of the total 9,761 reported manholes) and main/trunk sewers (30%). Proper operation and maintenance program through sewer cleaning, an ongoing pipe and manhole inspection program, and follow-up rehabilitation program.
- Preparation of an Emergency Response Plan (ERP) to include delineating specific utility staff responsibilities to responding emergencies, a public notification plan, and procedures to limit public contact with areas affected by sanitary sewer overflow (SSO) events, etc.

EPA Region 6 inspector David Esparza, PE conducted a closing conference at the Santa Fe WWTP at approximately 2:30 PM on September 3, 2025, for the inspection. During the closing conference, David Esparza discussed the requested completion of the Capacity, Management, Operation and Maintenance (CMOM) Self-Assessment document.

ADDITIONAL AREAS of CONCERN:

- A review of the submitted Integrated Compliance Information System (ICIS) Discharge Monitoring Reports (DMR) data for the period January 31, 2022, through August 27, 2025, indicates NPDES permit exceedances with respect to total Copper (as Cu), total Nitrogen (as N), Escherichia coli (E. coli), 5-day Biological Oxygen Demand (BOD₅), total Phosphorus (as P), total Suspended Solids (TSS), total Cyanide (as CN), Chlorine, Oxygen, dissolved (DO), and pH (Appendix 2 ICIS E90 Effluent Violations).
- A review of the submitted Integrated Compliance Information System (ICIS) Discharge Monitoring Reports (DMR) data for the period January 18, 2022, through June 23, 2025, indicates Santa Fe experienced 43 sanitary sewer overflow (SSO) events (Appendix 3 ICIS E80 NPDES Permit Violations).

Section IV – FOLLOW UP

The following information and/or clarification was received by EPA after exiting on September 3, 2025:

- Completed Capacity Management Operations and Maintenance Self-Assessment

Section V – LIST OF APPENDICES

Appendix 1 – Capacity Management Operations and Maintenance Self-Assessment

Appendix 2 – ICIS E90 Effluent Violations

Appendix 3 – ICIS E80 NPDES Permit Violations