Notification that US Environmental Protection Agency Region 6 will be conducting a Remote Video Partial Compliance Evaluation at City of Rio Rancho Wastewater Treatment Plant (WWTP) #2 (NM00227987) Date and Time that Remote Video Partial Compliance Evaluation will be conducted: April 28, 2021.

Process:

This email provides notification to City of Rio Rancho WWTP #2, Rio Rancho, New Mexico (NM0027987) that US Environmental Protection Agency Region 6 will be conducting a Remote Video Partial Compliance Evaluation (RVPCE) on April 28, 2021. As with on-site inspections, this RVPCE is conducted pursuant to authorities under Section 308 of Clean Water Act.

The RVPCE is a new compliance monitoring tool that US Environmental Protection Agency Region 6 is utilizing during the pendency of the COVID- 19 Public Health Emergency. During this time, to protect its employees and the employees of regulated facilities, US Environmental Protection Agency Region 6 is limiting use of on-site inspections to instances where there is known or potential noncompliance at high risk facilities. For more routine compliance monitoring of regulated facilities (e.g.,, required annual inspections), US Environmental Protection Agency Region 6 is evaluating the use of non-comprehensive RVPCEs which do not require agency inspectors to be on-site to assess facility continuing compliance with permit requirements. This remote method will take advantage of readily available and robust video communication capabilities (e.g., Smart Phones using video tools such as FaceTime) that will be remotely directed by the inspector from their agency workstation. A facility representative will be responsible for carrying the smartphone during a walkthrough of the facility so that the inspector can observe operations and conditions. The inspector and facility representative can carry out a dialogue as they would if the inspector was on site, including an opening conference, during the facility walk through, and during a closing conference. At various points during the walk through, the inspector may ask the facility representative to take and transmit digital photographs of facility components, operations, and/or monitoring devices, as the inspector would do if they were on site. As with an on-site inspection, the US Environmental Protection Agency Region 6 will not make a compliance determination during the RVPCE but will subsequently provide the facility with a report of the inspection within timeframes established by agency management.

Records/Documents Review Request In-Conjunction with Remote Video Partial Compliance Evaluation

GENERAL PROCEDURE

During the Remote Video Partial Compliance Evaluation (RVPCE) at City of Rio Rancho WWTP, US Environmental Protection Agency Region 6 will be reviewing records kept at your facility.
Generally, these records will date back **three years** from the present, but some of the records will be for specific time periods. To expedite this portion of the investigation, US Environmental Protection Agency Region 6 is providing you advanced notification of the records that will likely be reviewed during the RVPCE. For most documents, US Environmental Protection Agency Region 6 will review the records by video and request copies, as needed. In certain cases, document copies will be requested for later review at US Environmental Protection Agency Region 6.

In preparation for this RVPCE, US Environmental Protection Agency Region 6 has divided this record and document request into two portions. The first section consists of documents that US Environmental Protection Agency Region 6 would like available for review and copies prepared (as noted) on April 28, 2021. The second section consists of general and media specific documents that will probably be reviewed by US Environmental Protection Agency Region 6 inspectors. Other documents may also be requested that are not listed. During the investigation, US Environmental Protection Agency Region 6 will work with the City of Rio Rancho WWTP to develop a schedule to review these documents.

PART 1 - Please have requested documents available on April 28, 2021, which may include:

1. Current facility site map, inclusive of delineation of outfall location (Latitude/Longitude)
2. Summary of the WWTPs standard operating procedures (SOPs). Clarification if the WWTP accepts septage.
3. Summary of the WWTPs sanitary sewer overflow (SSO) protocol, inclusive of a spreadsheet type document delineating any/all SSO events specifically with respect to the previous 2-year period.
4. Management organization chart, including Environmental department. This should identify the number of full-time positions and hours of operation.
5. Summary of Industrial Users (IUs), inclusive of names and type(s) of operations. Clarification if the City utilizes a standard Service Agreement for all IUs or a specific Agreement for each. If a Standard Agreement is used identification when the document was last updated.
6. A spreadsheet type document identifying the quantity and location of any lift station(s).
7. A summary/discussion with respect to the August 2019 IMH Financial Corporation/Alpha Southwest unpermitted disposal.

PART 2 - Documents likely to be reviewed by US Environmental Protection Agency Region 6 inspectors:

General

1. Provide brief descriptions for all process areas including the following information:
    1. Simplified process flow diagrams
    2. Material balances
    3. Pollution control equipment and/or systems
    4. Raw materials used and annual usage.
    5. Products made
    6. Vessel cleaning procedures
2. List of on-site laboratories and types of analyses conducted.
3. Inventory of chemicals and quantities purchased during the last two years and list of products.
4. Enforcement actions/Notices of Violations (NOVs)
5. Consent Decrees/Orders/Agreements and related correspondences.
6. List of all shutdowns that have occurred during the last two years.
7. Management organizational chart (including environmental department)

Clean Water Act (CWA)

1. NPDES/State/municipal discharge permit(s) effective during the last 3 years, including any separate storm water permit(s).
2. Current NPDES/State/municipal discharge permit(s) application(s) including industrial, sanitary, pretreatment, and storm water. Also provide information on changes in process waste streams since permit application submittal.
3. Exceptions/exemptions/variances/appeals from current NPDES permit requirements.
4. All reports/plans required by NPDES/State discharge permit(s) including, but not limited to best management plans (BMPs), water quality impact assessments, toxicity studies, sludge management, spill plans, storm water pollution prevention plans, etc.

5. All as-built plans and/or written descriptions of the complete plant wastewater conveyance systems (e.g. above and below grade pipelines, sewers, pumping stations and trenches (including by-pass capability), monitoring stations, and outfall locations. Include process, sanitary, and storm water conveyance systems.
6. Description of all wastewater treatment plants (WWTP), including schematic diagrams, as-built plans, and any process changes since submittal of the NPDES/pretreatment permit application.
7. All WWTP operation and maintenance plans, manuals, and operations logbooks.
8. Written calibration procedures and records for flow measuring and recording equipment (industrial, storm, sanitary discharges) and wastewater sampling devices or continuous monitors (e.g. pH) used for compliance reporting purposes
9. Written sampling/preservation/chain of custody procedures for all self-monitoring data collected.
10. Discharge monitoring reports (DMRs) for the last three years.
11. Any correspondence regarding exceedances of discharge limitations during the last three years.
12. Any correspondence regarding spills, bypasses, or upsets during the last three years.
13. Any compliance order, schedule, penalty assessment, or other enforcement actions issued in the last three years and related correspondence.
14. Most recent inspection report(s) and response.
15. Production rates for determining effluent limitations for last 5 years.
16. Most recent NPDES/State discharge permit fact sheet.
17. All pretreatment and/or sewer use ordinances and permits.
18. SPCC and Facility Response Plans effective during past three years
19. Water balance diagram
20. Water intake information, both from on-site wells and surface waters