



January 8, 2025

*Via Email*

Dr. Maria-Elena Giner  
US Section, International Boundary and Water Commission  
4191 N. Mesa St.  
El Paso, TX 79902

Re: Hollister Pump Station, South Bay International Wastewater Treatment Plant

Dear Commissioner Giner:

Veolia is writing to update you on the status of the Hollister Pump Station at the South Bay International Wastewater Treatment Plant (the "Plant"). Recent events have further demonstrated the need for IBWC to take urgent action to replace failed components and provide redundancy at the Hollister Pump Station so it can reliably operate. The sewage spill there on New Year's Day last week was a consequence of the failure to timely replace vital equipment. We ask that IBWC now act with urgency to allow Veolia to restore full operation of the Hollister Pump Station by replacing outdated and damaged equipment.

The Hollister Pump Station receives flows from the Smuggler's Gulch collector and the Goat Canyon collector (via the Goat Canyon Pump Station) and then conveys those flows to the Plant for treatment. If the Hollister Pump Station is not functioning, all flows into Goat Canyon and Smuggler's Gulch must bypass the collectors. As such, the Hollister Pump Station is a significant component of the canyon collector system feeding into the Plant and protecting against flows down the canyons, it is critical that the systems at the Hollister Pump Station be reliable and have sufficient redundancy.

The Hollister Pump Station is equipped with four submersible pumps – two 220 hp pumps and two 75 hp pumps. The smaller pumps are designed to convey volumes from normal flows, while the larger pumps are designed to convey volumes from infrequent high-flow events. Normally, at least one small pump (for normal flows) and one large pump (for higher flows) should be functioning for normal operation of the Hollister Pump Station. These pumps direct flows to the Plant via two force main pipes. To limit surge and associated water hammer, each of the two force mains has a surge tank/arrestor, which is essential to the operation of its respective force main. The surge tanks are equipped with vacuum release valves to allow air to enter the system when negative air pressures occur within the tanks, which is necessary for the protection of the tanks against vacuum and for their proper operation.

The operation and maintenance of the canyon collectors and the Hollister Pump Station and Goat Canyon Pump Station have been a consistent challenge due to the regular influx from Mexico of grit and debris into Smuggler's Gulch and Goat Canyon. This ongoing problem has become significantly more challenging since 2023, with the initiation of a large-scale road



construction project along the border in Mexico. Mexican road construction crews regularly dump tons of dirt, sand and other building materials directly into the Smuggler's Gulch channel just before it flows to the IBWC canyon collector.

On June 17, 2024, Mexico had a significant flow event that sent large amounts of grit and debris into the system causing both surge tanks at the Hollister Pump Station to fill with grit and fail. The larger surge tank filled with approximately six feet of grit and debris, and the air relief valve on top of the tank became clogged. Simultaneously, the smaller surge tank developed a perforation at the bottom of the tank. As a result of this simultaneous failure caused by excessive grit, debris and sand entering the system from Mexico, the surge tanks flooded, overflowing the Hollister Pump Station's containment structure, damaging the Hollister Pump Station's electronic components, and causing a spill.

Veolia operations personnel promptly started clean-up and mitigation efforts, including engaging O.C. Vacuum to provide additional support to clean up and dispose of the grit and debris material from the spill at Hollister Pump Station into the Plant. On June 17, 2024, IBWC authorized Veolia via email to dewater and clean the area around the Hollister Pump Station, with an initial budget not to exceed \$200,000.

The initial dewatering of the containment structure took almost four days of continuous 24/7 operation (June 17-21). The wet well was cleaned on June 21, 2024, and cleaning of the surge tanks took place from June 24-27. The smaller surge tank was unrepairable due to the age and thinness of the metal of the tank. Veolia also engaged the services of a certified tank inspection contractor to evaluate the condition of the larger surge tank to see if it could be put back into use after repairs were made. The tank inspection took place on July 1, 2024, and the inspector determined that the large surge tank had enough wall thickness for temporary use following a recoating. The age of the surge tanks also complicated repairs because the manufacturer no longer makes replacement components. Veolia advised IBWC that similar surge tanks at the Goat Canyon Pump Station were also vulnerable due to their age and condition, and Veolia recommended replacing those tanks as well. Veolia also advised IBWC that while the large surge tank could potentially be put back into service temporarily, doing so was not a long-term sustainable solution.

Following the June 17 incident, Veolia recommended to IBWC that the tanks at both Hollister Pump Station and Goat Canyon Pump Station be replaced.

The issue was revisited during the biweekly capital projects meetings with IBWC staff in July (July 10, 2024 and July 24, 2024), in which Veolia reiterated the need to replace the surge tanks at the Hollister Pump Station. Veolia also advised IBWC that additional electrical construction work was needed to bring the Hollister Pump Station's electrical junction boxes and conduits above ground. This infrastructure was installed below ground in the wetwell, and, as previously noted by Veolia, the existing conduits and wiring were compromised as a result of the floods of Hurricane Hilary in 2023.



On July 30, 2024, IBWC requested a proposal from Veolia for the additional electrical construction work and ancillary work needed to temporarily restore the Hollister Pump Station to service, with just the one larger surge tank returned to service. Once this emergency work was complete, only the larger pumps would be operational, as IBWC had not approved replacing the smaller surge tank. Veolia repeatedly informed IBWC staff that operating the Hollister Pump Station with just the large pumps and single surge tank would present operational difficulties, as the large pumps were not designed to handle smaller flows or to be the primary pumps for the station, and that the system was extremely vulnerable to failure because of lack of redundancy and overuse straining the already-damaged system.

On July 31, 2024, Veolia submitted a proposal to execute the required electrical work and to repair the existing larger surge tank to return the Hollister Pump Station temporarily to service.

On August 2, 2024, IBWC submitted via email the notice to start the electrical and tank repair work (including replacing the tank's vacuum release valve), with a budget not to exceed \$200,000. Veolia and its subcontractors worked diligently and brought the Hollister Pump Station back into service on September 16, 2024.

IBWC requested that Veolia propose options to replace the surge tanks of both the Hollister and Goat Canyon Pump Stations, and Veolia worked with potential subcontractors to develop options to replace the surge tanks and the pump stations. On August 14, 2024, IBWC posted an RFP on sam.gov for a Repair to Grit Facility package, in which IBWC also requested, as additional bid option items, the replacement of the surge tanks at the Hollister and Goat Canyon Pump Stations. The proposal due date was September 9, 2024 (which was later extended to September 13).

On September 13, 2024, Veolia submitted via email a response to the IBWC RFP, which included options to replace the tanks at the Hollister and Goat Canyon Pump Stations. IBWC confirmed receipt of this RFP response, but, to Veolia's knowledge, to date no action has been taken with respect to the work described in the RFP.

Despite Veolia's repeated and consistent requests to IBWC staff over many months to address this urgent situation, Veolia never received official feedback on its RFP response. However, in one of the biweekly capital projects meetings in October, IBWC staff mentioned that the RFP scope of work would not be executed as a standalone project but would instead be added to the larger Plant expansion/rehabilitation project with PCL and Stantec. This comment was very concerning to Veolia, as it indicated that IBWC was not intending to address the Hollister Pump Station shortcomings in a reasonable time frame. Our understanding is that the rehabilitation/expansion project will take several years to complete, while the shortcomings of the existing surge tanks should be addressed immediately.



Around October 18, 2024, the one functional larger tank began to experience operational issues related to the controls and maintaining the pressure necessary for proper operation. On October 21, 2024, Veolia again recommended that IBWC replace the surge tanks. IBWC responded via email stating: "Thanks for the response and recommendation to replace the tanks - we are working on that, but we need to use the existing tank until new ones are ready." Veolia is unaware of any active efforts to procure new tanks for the Hollister Pump Station. We would appreciate an update on any efforts that have been undertaken. Operating with just one damaged, outdated tank left the Hollister Pump Station vulnerable to another failure, despite multiple recommendations from Veolia to replace the tanks.

Unfortunately, that failure occurred on January 1, 2025 at around 6:00 pm, when the vacuum release valve of the larger surge tank failed, leading to a spill in the Hollister Pump Station odor control building and eventually onto the nearby street. At the time, only the larger pumps and surge tank were operating, so there was no redundancy. It is extremely unfortunate that, because Veolia never received approval to address this situation fully, we now have an urgent and serious issue that requires immediate attention. Veolia staff are working expeditiously to fix the vacuum release valve (which is under warranty) and address the immediate situation, but it is imperative that IBWC take additional action now to get the Hollister Pump Station fully equipped and returned to normal operating conditions. Veolia respectfully requests that IBWC issue emergency authorization for Veolia to replace all the surge tanks at the Hollister Pump Station and the Goat Canyon Pump Station. Prompt action is required to procure new tanks as quickly as possible. Until the tanks are replaced, the small pumps are brought back online and the pump station is fully restored, we anticipate additional mechanical failures will occur due to the overuse of the large pumps for normal flows. Veolia stands ready to help expedite procurement of replacement tanks to fully restore the Hollister Pump Station and prevent additional failures at this critical piece of infrastructure.

If you have any questions or would like to discuss our request further, please don't hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Chandrasekar Venkatraman".

Chandrasekar Venkatraman, PE  
President, Capital Program Management  
Municipal Water Contract Operations, VNA



CC:

Isela Canava

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