

# **NPDES PERMIT NO. NM0028835**

## **FACT SHEET**

FOR THE DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
(NPDES) PERMIT TO DISCHARGE TO WATERS OF THE UNITED STATES

### **APPLICANT**

City of Socorro Wastewater Treatment Plant  
P.O. Drawer K  
302 Main Street  
Socorro, NM 87801

### **ISSUING OFFICE**

U.S. Environmental Protection Agency  
Region 6  
1445 Ross Avenue  
Dallas, Texas 75202-2733

### **PREPARED BY**

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### **DATE PREPARED**

June 30, 2015

### **PERMIT ACTION**

EPA is proposing reissuance of the current permit issued September 27, 2010, with an effective date of November 1, 2010, and an expiration date of October 31, 2015.

### **RECEIVING WATER – BASIN**

The Luis Lopez Drain, thence to Socorro Riverside Drain, thence to the Rio Grande in water quality Segment No. 20.6.4.105 of the Rio Grande Basin.

**DOCUMENT ABBREVIATIONS**

In the document that follows, various abbreviations are used. They are as follows:

4Q3	Lowest four-day average flow rate expected to occur once every three-years
BAT	Best available technology economically achievable
BCT	Best conventional pollutant control technology
BPT	Best practicable control technology currently available
BMP	Best management plan
BOD	Biochemical oxygen demand (five-day unless noted otherwise)
BPJ	Best professional judgment
CBOD	Carbonaceous biochemical oxygen demand (five-day unless noted otherwise)
CD	Critical dilution
CFR	Code of Federal Regulations
cfs	Cubic feet per second
COD	Chemical oxygen demand
COE	United States Corp of Engineers
CWA	Clean Water Act
DMR	Discharge monitoring report
ELG	Effluent limitation guidelines
EPA	United States Environmental Protection Agency
ESA	Endangered Species Act
FCB	Fecal coliform bacteria
F&WS	United States Fish and Wildlife Service
mg/l	Milligrams per liter (one part per million)
ug/l	Micrograms per liter (one part per billion)
MGD	Million gallons per day
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NMIP	New Mexico NPDES Permit Implementation Procedures
NMWQS	New Mexico State Standards for Interstate and Intrastate Surface Waters
NPDES	National Pollutant Discharge Elimination System
SQL	Minimum quantification level
O&G	Oil and grease
POTW	Publically owned treatment works
RP	Reasonable potential
SIC	Standard industrial classification
s.u.	Standard units (for parameter pH)
SWQB	Surface Water Quality Bureau
TDS	Total dissolved solids
TMDL	Total maximum daily load
TRC	Total residual chlorine
TSS	Total suspended solids
UAA	Use attainability analysis
USFWS	United States Fish & Wildlife Service
USGS	United States Geological Service
WLA	Wasteload allocation
WET	Whole effluent toxicity
WQCC	New Mexico Water Quality Control Commission
WQMP	Water Quality Management Plan
WWTP	Wastewater treatment plant

## **I. CHANGES FROM THE PREVIOUS PERMIT**

There is a significant change of permit conditions from the current permit:

1. Change critical dilution from 37% to 19%
2. BOD5 and TSS percent removal limits have been added, in accordance with secondary treatment requirements at 40 CFR 133.102.

## **II. APPLICANT LOCATION and ACTIVITY**

The facility is located at 302 Main Street, in the City of Socorro, NM. The effluent from the site is discharged into the Luis Lopez Drain, thence to Socorro Riverside Drain, thence to the Rio Grande in water quality Segment No. 20.6.4.105 of the Rio Grande Basin. The discharge is located on that water at Latitude 34° 03' 12" North and Longitude 106° 53' 18" West, in Socorro County, New Mexico.

Under SIC Code 4952, the discharge is from a POTW. The treatment processes include a mechanical bar screen (and a manual bar screen in the bypass channel), grit removal (out of process for several years), three sequencing batch reactors, gas chlorine contact chamber and de-chlorination. The current design flow is 1.30 MGD. The sludge produced at the site passes through a sludge thickener, aerobic digesters, belt-filter presses, then is trucked to the City's municipal landfill site.

## **III. EFFLUENT CHARACTERISTICS**

The facility submitted effluent data with its Application Form 2A, dated April 22, 2015. The permit application is determined to be administratively complete on May 5, 2015. Effluent characteristics indicate several metals, volatile organic and acid extractable pollutants were detected in the discharge. Also, the facility's DMRs for the period of November 1, 2010 through May 31, 2015 show exceedance of the Total Residual Chlorine limit of 19 ug/l from January 31, 2011 to May 31, 2012 on several occasions. However, no exceedances have been reported after May 31, 2012.

## **IV. REGULATORY AUTHORITY/PERMIT ACTION**

In November 1972, Congress passed the Federal Water Pollution Control Act establishing the NPDES permit program to control water pollution. These amendments established technology-based or end-of-pipe control mechanisms and an interim goal to achieve "water quality which provides for the protection and propagation of fish, shellfish, and wildlife and provides for recreation in and on the water," more commonly known as the "swimmable, fishable" goal. Further amendments in 1977 of the CWA gave EPA the authority to implement pollution control programs such as setting wastewater standards for industry and established the basic structure for regulating pollutants discharges into the waters of the United States. In addition, it made it unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a permit was obtained under its provisions. Regulations governing the EPA administered

NPDES permit program are generally found at 40 CFR §122 (program requirements & permit conditions), §124 (procedures for decision making), §125 (technology-based standards) and §136 (analytical procedures). Other parts of 40 CFR provide guidance for specific activities and may be used in this document as required.

## V. DRAFT PERMIT RATIONALE AND PROPOSED PERMIT CONDITIONS

### A. OVERVIEW of TECHNOLOGY-BASED VERSUS WATER QUALITY STANDARDS-BASED EFFLUENT LIMITATIONS AND CONDITIONS

Regulations contained in 40 CFR §122.44 requires that NPDES permit limits are developed that meet the more stringent of either technology-based effluent limitation guidelines, numerical and/or narrative water quality standard-based effluent limits, or the previous permit.

### B. TECHNOLOGY-BASED EFFLUENT LIMITATIONS/CONDITIONS

Regulations promulgated at 40 CFR §122.44 (a) require technology-based effluent limitations to be placed in NPDES permits based on ELGs where applicable, on BPJ in the absence of guidelines, or on a combination of the two. In the absence of promulgated guidelines for the discharge, permit conditions may be established using BPJ procedures. EPA establishes limitations based on the following technology-based controls: BPT, BCT, and BAT. These levels of treatment are:

**BPT** - The first level of technology-based standards generally based on the average of the best existing performance facilities within an industrial category or subcategory.

**BCT** - Technology-based standard for the discharge from existing industrial point sources of conventional pollutants.

**BAT** - The most appropriate means available on a national basis for controlling the direct discharge of toxic and non-conventional pollutants to navigable waters. BAT effluent limits represent the best existing performance of treatment technologies that are economically achievable within an industrial point source category or subcategory.

The facility is a POTW treating sanitary wastewater. POTW's have technology-based ELG's established at 40 CFR Part 133, Secondary Treatment Regulation. Pollutants with ELG's established are BOD, TSS and pH. BOD limits of 30 mg/l for the 30-day average and 45 mg/l for the 7-day average are found at 40 CFR §133.102(a). TSS limits; also 30 mg/l for the 30-day average and 45 mg/l for the 7-day average, are found at 40 CFR §133.102(b). ELG's for pH are between 6-9 s.u. and are found at 40 CFR §133.102(c). Regulations at 40 CFR §122.45(f)(1) require all pollutants limited in permits to have limits expressed in terms of mass such as pounds per day. When determining mass limits for POTW's, the plant's design flow is used to establish the mass load. Mass limits are determined by the following mathematical relationship:

Loading in lbs/day = pollutant concentration in mg/l \* 8.345 lbs/gal \* design flow in MGD  
30-day average TSS loading = 30 mg/l \* 8.345 lbs/gal \* 1.3 MGD = 325 lbs/day

30-day average BOD loading = 30 mg/l \* 8.345 lbs/gal \* 1.3 MGD = 325 lbs/day  
 Technology-Based Effluent Limits – 1.3 MGD design flow.

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS			
	lbs/Day		mg/l (unless noted)	
Parameter	30-Day Avg.	7-Day Avg.	30-Day Avg.	7-Day Avg.
Flow	N/A	N/A	Measure MGD	Measure MGD
CBOD <sub>5</sub>	325	488	30	45
TSS	325	488	30	45
pH	N/A	N/A	6.0 – 9.0 standard units	

**C. WATER QUALITY BASED LIMITATIONS**

**1. General Comments**

Water quality based requirements are necessary where effluent limits more stringent than technology-based limits are necessary to maintain or achieve federal or state water quality limits. Under Section 301(b) (1) (C) of the CWA, discharges are subject to effluent limitations based on federal or state WQS. Effluent limitations and/or conditions established in the draft permit are in compliance with applicable State WQS and applicable State water quality management plans to assure that surface WQS of the receiving waters are protected and maintained, or attained.

**2. Implementation**

The NPDES permits contain technology-based effluent limitations reflecting the best controls available. Where these technology-based permit limits do not protect water quality or the designated uses, additional water quality-based effluent limitations and/or conditions are included in the NPDES permits. State narrative and numerical water quality standards are used in conjunction with EPA criteria and other available toxicity information to determine the adequacy of technology-based permit limits and the need for additional water quality-based controls.

**3. State Water Quality Standards**

The general and specific stream standards are provided in NMWQS (20.6.4 NMAC effective June 5, 2013). The facility discharges into the Luis Lopez Drain, thence to Socorro Riverside Drain, thence to the Rio Grande in segment number 20.6.4.105 of the Rio Grande Basin. The designated uses of the receiving water are irrigation, marginal warm-water aquatic life, livestock watering, public water supply, wildlife habitat and primary contact.

**4. Permit Action - Water Quality-Based Limits**

Regulations promulgated at 40 CFR §122.44(d) require limits in addition to, or more stringent than effluent limitation guidelines (technology based). State WQS that are more stringent than effluent limitation guidelines are as follows:

a. BACTERIA

Previous permits had effluent limitations for fecal coliform based on the pre-2005 WQS and those limitations became invalid after EPA approved the 2005 WQS. The draft permit proposes not to include a monitoring requirement and effluent limitation for fecal coliform because The WQS for fecal coliform was replaced with E. coli in the EPA approved NMWQS. The draft permit applies site-specific E. coli TMDL assigned to the facility- the daily limitation of 126 cfu/100 ml and  $6.21 \times 10^9$  cfu/day at the point of discharge.

b. pH

Stream segment specific (20.6.4.105 NMAC) WQS for pH range of 6.6 - 9.0 s.u., is more restrictive than the technology-based pH range, so WQ-based pH applies.

c. TOXICS

i. General Comments

The CWA in Section 301 (b) requires that effluent limitations for point sources include any limitations necessary to meet water quality standards. Federal regulations found at 40 CFR §122.44 (d) state that if a discharge poses the reasonable potential to cause an in-stream excursion above a water quality criteria, the permit must contain an effluent limit for that pollutant.

All applicable facilities are required to fill out appropriate sections of the Form 2A and 2S, to apply for an NPDES permit or reissuance of an NPDES permit. The new form is applicable not only to Publicly Owned Treatment Works (POTWs), but also to facilities that are similar to POTWs, but which do not meet the regulatory definition of “publicly owned treatment works” (like private domestics, or similar facilities on Federal property). The forms were designed and promulgated to “make it easier for permit applicants to provide the necessary information with their applications and minimize the need for additional follow-up requests from permitting authorities,” per the summary statement in the preamble to the Rule. These forms became effective December 1, 1999, after publication of the final rule on August 4, 1999, Volume 64, Number 149, pages 42433 through 42527 of the FRL.

The facility is designated a major POTW for permitting purposes and must supply the expanded pollutant testing list described in EPA Application Form 2A. Detected toxic pollutants are discussed above in Part III of this Fact Sheet.

Luis Lopez Drain is a perennial stream and the 4Q3 flow is 10.4 cfs which is approximately 5.6 MGD. The critical dilution (CD) for the facility is calculated to be 19 % ( $1.3 \text{ MGD}/(1.3 + 5.6)$  MGD).

ii. Reasonable Potential

Stream flow data recorded at USGS Station (Station ID 08354900) in Rio Grande Floodway at San Acacia, and stream water quality data from NMED Station ID 32RGrand292.8 are used for RP calculations. The stream 4Q3 flow is 10.4 cfs; and harmonic mean flow, 52.7 cfs, geometric mean TSS, 1817 mg/l, and geometric mean hardness, 203 mg/l. Based on the NMIP, RP is determined by comparing a discharged pollutant concentration times an appropriate statistical variability factor; 2.13, and then comparing the result against the in-stream criteria. The calculation results indicate that the discharge has no RP to cause or contribute to violations of State WQS. However, the ambient data have demonstrated that the average stream aluminum concentration has exceeded the WQS. The NMED has developed facility-specific TMDL for dissolved aluminum. The TMDL assigned to the City of Socorro is discussed in subsection 5 below.

### iii. TRC

The facility uses chlorine for disinfection. EPA established a TRC limitation of 11  $\mu\text{g/l}$  based on an assumption of 0 cfs 4Q3 flow. Because Luis Lopez Drain is a perennial stream and the 4Q3 flow is 10.4 cfs which is about 5.6 MGD, EPA recalculated the TRC effluent limitation and determined the proper TRC limitation should be the acute aquatic life criteria of 19  $\mu\text{g/l}$ . The draft permit establishes an effluent limitation and monitoring requirement for TRC based on the criteria for aquatic life use.

## 5. TMDL Requirements

The NMED has developed site-specific TMDL document for the Middle Rio Grande Watershed and NM Water Quality Control Commission (WQCC) has approved the TMDL document. EPA proposes effluent limitations in accordance with the TMDL document in order to comply with State laws. The TMDL document proposes a daily effluent limitation of 126 cfu/100 ml and a WLA of  $6.21 \times 10^9$  cfu/day (or 6210 Mcfu/day) of E. coli and a WLA of 0.943 lbs/day of dissolved aluminum for the City of Socorro. The final TMDL was approved by EPA on June 30, 2010. Also the WLA for dissolved aluminum was calculated based on the chronic aquatic life criteria, 87  $\mu\text{g/l}$ . EPA propose both mass load and concentration effluent limitations for aluminum in the draft permit pursuant to the TMDL document.

Because federal regulations require effluent limitations for total recoverable, instead of dissolved, metals to be established in the permit. Linear partition coefficients are used to convert dissolved standards to total standards, or vice versa, for screening purpose. If a linear partition coefficient is not available, a ratio of dissolved/total metal concentration is assigned to be 1.0 for both screening and compliance purposes. Because a linear partition coefficient for aluminum is not available, the draft permit proposes effluent limitations for total aluminum and monitoring only requirement for dissolved aluminum. The permittee may use dissolved results to demonstrate in compliance with its TMDL limit or develop a site-specific aluminum linear partition coefficient.

D. MONITORING FREQUENCY FOR LIMITED PARAMETERS

Regulations require permits to establish monitoring requirements to yield data representative of the monitored activity, 40 CFR §122.48(b), and to assure compliance with permit limitations, 40 CFR §122.44(i)(1). Sample frequency is based on the March, 2012, NMIP. Based on the design flow of the facility, 1.3 MGD, monitoring frequencies are proposed to be daily for flow, pH and TRC; once per week for BOD<sub>5</sub>, TSS and E. coli, and three samples per week for aluminum.

Flow is proposed to be monitored continuously by totalizing meter. E. coli bacteria and pH shall use grab samples. The other parameters; BOD, TSS and aluminum shall use 24-Hr composite samples. TRC shall be sampled daily using instantaneous grab samples. Regulations at 40 CFR §136 define instantaneous grab as being analyzed within 15-minutes of collection.

E. WHOLE EFFLUENT TOXICITY LIMITATIONS

Procedures for implementing WET terms and conditions in NPDES permits are contained in the March 2012, Procedures for Implementing NPDES Permits in New Mexico (NMIP). Table 11 of Section V of the NMIP outlines the type of WET testing for different types of discharges. Since there is no history of WET failures during the last permit term and no known operational issues would indicate significant potential to exert toxicity in the receiving stream, therefore it is assumed that there is no reasonable potential to exceed WQS at this time. The permit proposes 7 day chronic WET testing using *Ceriodaphnia dubia* and *Pimephales promelas* at a once per three-month frequency starting with the first year of the permit consistent with the NMIP-WET guidance. If all these four tests pass both the lethal and sub-lethal test endpoints then the permit may allow a frequency reduction to once per six-months for *Ceriodaphnia dubia* and once per year for *Pimephales promelas*. Any failure shall re-establish all tests for the affected species to once per three-month for the remainder of the permit. The test series will be 0% (control), 8%, 11%, 14%, 19% and 25%.

During the period beginning the effective date of the permit and lasting through the expiration date of the permit, the permittee is authorized to discharge from Outfall 001 - the discharge to Luis Lopez Drain, thence to Socorro Riverside Drain, thence to Rio Grande of the treatment system aeration basin. The aeration basin receives process area wastewater, process area stormwater, and treated sanitary wastewater. Discharges shall be limited and monitored by the permittee as specified below:

EFFLUENT CHARACTERISTIC	DISCHARGE MONITORING	
	30-DAY AVG MINIMUM	7-DAY MINIMUM
Whole Effluent Toxicity Testing (7 Day Static Renewal) <u>1/</u>		
<u><i>Ceriodaphnia dubia</i></u>	REPORT	REPORT
<u><i>Pimephales promelas</i></u>	REPORT	REPORT

<u>EFFLUENT CHARACTERISTIC</u>	<u>MONITORING REQUIREMENTS</u>	
	<u>FREQUENCY</u>	<u>TYPE</u>
Whole Effluent Toxicity Testing (7 Day Static Renewal)		
<i>Ceriodaphnia dubia</i>	1/Quarter	24-Hr. Composite
<i>Pimephales promelas</i>	1/Quarter	24-Hr. Composite

**VI. FACILITY OPERATIONAL PRACTICES**

**A. SEWAGE SLUDGE**

The permittee shall use only those sewage sludge disposal or reuse practices that comply with the federal regulations established in 40 CFR Part 503 "Standards for the Use or Disposal of Sewage Sludge". The specific requirements are detailed in Part IV of the permit.

**B. WASTE WATER POLLUTION PREVENTION REQUIREMENTS**

The facility has no significant industrial users. EPA determined that the permittee will not be required to develop a full pretreatment program.

**C. OPERATION AND REPORTING**

The applicant is required to operate the treatment facility at maximum efficiency at all times; to monitor the facility’s discharge on a regular basis; and report the results monthly. The monitoring results will be available to the public. The permittee may submit electronic DMRs if approved by EPA in according with section D.4, Part III of the permit.

**VII. 303(d) LIST**

Rio Grande segment 20.6.4.105 from San Marcial at USGS gage to the Rio Puerco is listed on the “2008 - 2010 State of New Mexico 303(d) List for Assessed River/Stream Reaches Requiring Total Maximum Daily Loads (TMDLs)” for not supporting marginal warmwater aquatic life and secondary contact and the probable causes of impairment are aluminum and E. coli. A TMDL has been developed and approved (4A). The segment specific TMDLs are incorporated as effluent limitations into the draft permit as described in section V.C.5 above.

**VIII. ANTIDegradation**

The NMAC, Section 20.6.4.8 “Anti-degradation Policy and Implementation Plan” sets forth the requirements to protect designated uses through implementation of the State water quality standards. The limitations and monitoring requirements set forth in the proposed permit are developed from the State water quality standards and are protective of those designated uses. Furthermore, the policy sets forth the intent to protect the existing quality of those waters, whose quality exceeds their designated use. The permit requirements and the limits are protective of the

assimilative capacity of the receiving waters, which is protective of the designated uses of that water, NMAC Section 20.6.4.8.A.2.

### **IX. ANTIBACKSLIDING**

The proposed permit is consistent with the requirements to meet anti-backsliding provisions of the Clean Water Act, Section 402(o) and 40 CFR §122.44(l)(i)(A), which state in part that interim or final effluent limitations must be as stringent as those in the previous permit, unless material and substantial alterations or additions to the permitted facility occurred after permit issuance which justify the application of a less stringent effluent limitation. The proposed permit does not relax any effluent limitations. Effluent limitations for fecal coliform in the current permit became invalid at the time EPA approved the 2005 NMWQS.

### **X. ENDANGERED SPECIES CONSIDERATIONS**

According to the re-proposing of the permit in 2010, the US Fish and Wildlife Service (USFWS), Southwest Region 2 website, [http://www.fws.gov/southwest/es/NewMexico/SBC\\_view.cfm?spenty=Socorro](http://www.fws.gov/southwest/es/NewMexico/SBC_view.cfm?spenty=Socorro), listed eight species as endangered for the Socorro County, New Mexico: Socorro isopod, Least tern, northern aplomado falcon, southwestern willow flycatcher, black-footed ferret, Rio Grande silvery minnow, Alamosa springsnail, and Socorro springs nail; and three as threatened species: Chiricahua leopard frog, Mexican spotted owl, and piping plover.

The U.S. Fish and Wildlife Service (FWS) back in 2001 was consulted by EPA, Region 6 regarding the above referenced eleven species. EPA had determined that the permitting action had “no effect” on black-footed ferret, whooping crane, interior least tern, northern aplomado falcon, bald eagle, Mexican spotted owl, piping plover, Socorro isopod and Alamosa springsnail. The FWS had concurred with EPA’s findings in a letter dated May 30, 2001, that the reissued permit may affect, but is not likely to adversely affect the southwestern willow flycatcher and the Rio Grande silvery minnow. The consultation was referred to as Cons. # 2-22-01-I-196.

EPA further evaluated the effect on Socorro springsnail and Chiricahua leopard frog back in 2006 during re-proposing the permit. EPA, Region 6 had determined that there were “no effect” on these two species. EPA did not authorize any increase of pollutants to be discharged into the environment nor to significantly relax permit conditions through this permit renewal action. The facility has improved its treatment process since the last issuance of the permit. EPA had determined that there was no change on the 2001 Section 7 of ESA consultation baseline and the permit renewal action had “no effect” on the rest of listed species.

In addition, an evaluation of the ESA during 2015 re-proposing of the permit shows that black-footed ferret and northern aplomado falcon have been deleted, and two new species have been added as endangered: New Mexico Meadow Jumping Mouse and Chupadera Springsnail. Also, yellow-billed Cuckoo and Pecos flowing plant have been included as threatened at the FWS website at [http://ecos.fws.gov/tess\\_public/reports/species-by-current-range-county?fips=35053](http://ecos.fws.gov/tess_public/reports/species-by-current-range-county?fips=35053). Based on information available on the internet, EPA, Region 6 does not believe that the discharge from the Socorro wastewater facility will have any adverse impact on new listed species.

**XI. HISTORICAL and ARCHEOLOGICAL PRESERVATION CONSIDERATIONS**

The reissuance of the permit should have no impact on historical and/or archeological sites since no construction activities are planned in the reissuance.

**XII. PERMIT REOPENER**

The permit may be reopened and modified during the life of the permit if State Water Quality Standards are promulgated or revised. In addition, if the State amends a TMDL, this permit may be reopened to establish effluent limitations for the parameter(s) to be consistent with that TMDL. Modification of the permit is subject to the provisions of 40 CFR §124.5.

**XIII. VARIANCE REQUESTS**

No variance requests have been received.

**XIV. CERTIFICATION**

The permit is subject to certification by the State Agency following regulations promulgated at 40 CFR 124.53. A draft permit and draft public notice will be sent to the District Engineer, Corps of Engineers; to the Regional Director of the U.S. Fish and Wildlife Service and to the National Marine Fisheries Service prior to the publication of that notice.

**XV. FINAL DETERMINATION**

The public notice describes the procedures for the formulation of final determinations.

**XVI. ADMINISTRATIVE RECORD**

The following information was used to develop the proposed permit:

**A. APPLICATION(S)**

EPA Application Form 2A received April 22, 2015.

**B. 40 CFR CITATIONS**

Citations to 40 CFR are as of January 20, 2010.  
Sections 122, 124, 125, 133, 136

**C. STATE OF NEW MEXICO REFERENCES**

New Mexico State Standards for Interstate and Intrastate Surface Water, 20.6.4 NMAC, as effective June 5, 2013.

Procedures for Implementing National Pollutant Discharge Elimination System Permits in New Mexico, March 15, 2012.

2008 - 2010 State of New Mexico 303(d) List.

Final draft TMDL for the Middle Rio Grande Watershed, dated June 30, 2010

New Mexico Ecological Services Field Office- Listed and Sensitive Species in Socorro County.

Emails from Sandra Gabaldon (NMED) to Jim Afghani (EPA, Region 6), dated June 5, 2015 and June 18, 2015, respectively.