LOS ALAMOS

Department of Public Utilities

Electric, Gas, Water, and Wastewater Services

March 30, 2022

SENT VIA USPS REGULAR MAIL AND ELECTRONIC MAIL TO:

Mr. Tung Nguyen
Environmental Engineer
NPDES Permitting Section (6WD-PE)
U.S. Environmental Protection Agency
1201 Elm Street, Suite 500
Dallas, Texas 75270
nguyen.tung@epa.gov

Ms. Evelyn Rosborough
U.S. Environmental Protection Agency
Water Quality Protection Division (6WQ-NP)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202
rosborough.evelyn@epa.gov

Re: Incorporated County of Los Alamos Submission of Comments for Renewal of NPDES Permit No. NM0020141

Dear Mr. Nguyen and Ms. Rosborough:

The Incorporated County of Los Alamos ("County"), through its Department of Public Utilities ("DPU") hereby provides U.S. Environmental Protection Agency, Water Quality Protection Division (6WD-PE) ("Agency") its comments related to the proposed renewal of NPDES Permit No. NM0020141. The County and DPU appreciates EPA's attention and patience regarding the submission of the comments contained herein.

DPU attaches hereto its comments in relation to the above referenced permit renewal.

Administrative Office
1000 Central Avenue, Suite 130
Los Alamos, NM 87544
P 505.662.8333 F 505.662.8005

dpu@lacnm.us
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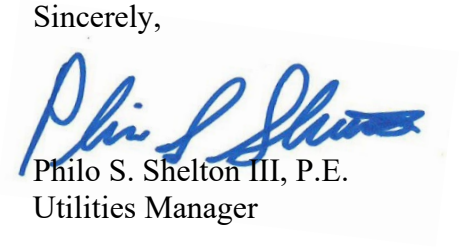
DPU would request that prior to the close public comments for both EPA and NMED, that the parties meet to discuss DPU's concerns, as it may resolve several comments contained in our comments. If EPA is unable to postpone the deadline for public comments, DPU would request that EPA hold a public hearing or meeting on the proposed draft permit as provided under federal code.

The County and DPU appreciate this opportunity to submit comments to the draft NPDES Permit and we look forward to working with the EPA on the final terms.

Sincerely,



Philo S. Shelton III, P.E.
Utilities Manager

Enclosure

cc: Ms. Susan A. Lucas Kamat, Program Manager, NMED SWQB (Email Only)
Ms. Barbara Cooney, NMED, Surface Water Quality Bureau (Email Only)
Mr. Brent Larson, US EPA, Region VI, Permitting Section (Email Only)
Mr. Jack Richardson, Deputy Utility Manager, GWS (Email Only)
Mr. James Alarid, Deputy Utility Manager, Engineering (Email Only)
Mr. Steve Lynne, County Manager (Email Only)
Mr. Alvin Leaphart, County Attorney (Email Only)
Mr. Cornell Wright, Chair, Board of Public Utilities (Email Only)
Mr. Randall Ryti, Chair, County Council (Email Only)
Mr. Kevin Powers, Asst. County Attorney (Email Only)

Incorporated County of Los Alamos Comments to

U.S. Environmental Protection Agency, Region 6
Water Division

National Pollutant Discharge Elimination System ("NPDES")
Permit No. NM0020141

Prepared by the

LOS ALAMOS
Department of Public Utilities
Electric, Gas, Water, and Wastewater Services

Incorporated County of Los Alamos, New Mexico

March 30, 2022

DEPARTMENT OF PUBLIC UTILITIES OF THE INCORPORATED COUNTY OF LOS ALAMOS, NEW MEXICO COMMENTS TO THE RENEWAL OF NPDES PERMIT NO. NM0020141 FOR THE LOS ALAMOS TOWNSITE MUNICIPAL WASTEWATER TREATMENT PLANT

Contents

DEPARTMENT OF PUBLIC UTILITIES OF THE INCORPORATED COUNTY OF LOS ALAMOS, NEW MEXICO COMMENTS TO THE RENEWAL OF NPDES PERMIT NO. NM0020141 FOR THE LOS ALAMOS TOWNSITE MUNICIPAL WASTEWATER TREATMENT PLANT

The Incorporated County of Los Alamos ("County"), through its Department of Public Utilities ("DPU"), hereby submits its public comments to the U.S. Environmental Protection Agency Region 6("EPA"), in renewal of municipal NPDES Permit No. NM0020141.

I. EPA's Draft Permit Changes Compliance from Best Available Technology (BAT) to, in part, Compliance to in-stream Water Quality Standards.

As provided by EPA in the draft permit document and Fact Sheet[1], DPU is greatly concerned that EPA is proposing to change the long-standing compliance and discharge limits from one based on best available technology ("BAT") and Technology Based Effluent Limitations ("TBEL") to one requiring in-stream water quality standard-based limitation. **DPU would request EPA explain what law, code, or case authorizes EPA the authority to include NPDES discharge limits based on in-stream water quality standards without conducting the required TMDL process.**

A. *NPDES Discharge Limits based on In-Stream Water Quality Standards are Improper without developing TMDLs.*

DPU asserts that EPA's inclusion of municipal in-stream water quality standards in the renewing NPDES permit is improper and circumvents clearly established federal laws and codes that mandate that EPA and the State of New Mexico establish a total maximum daily load ("TMDL") for the various discharge in a stream segment and for a specific pollutant to establish NPDES permit discharge limitations to address in-stream impairments. *See generally* https://www.epa.gov/tmdl/developing-total-maximum-daily-loads-tmdls ("After the identification of water quality-limited waters is completed, states develop TMDLs at a level necessary to achieve the applicable state water quality standards. Waters targeted for TMDL development are based on the extent of pollution and the use(s) of the water, (*e.g.*, health of aquatic life or public recreation),

[1] The draft permit and related documents were provided to the County's DPU on Friday, January 28, 2022 via email from Stephanie Abbott, U.S. EPA, Region VI, to Mr. Philo Shelton, DPU Manager.

and the identity of the pollutant(s) causing or expected to cause the impairment.") *see also* 33 U.S.C. § 1313(d), and 33 U.S.C. § 1342.

As provided in 33 U.S.C. § 1313, and related federal code sections, Congress has set out a public process where EPA and states are to set NPDES point-source discharge limitations based on actual collected data demonstrating the sources of pollutants. From this, and through the public process, EPA and the State set specific waste load allocations for both point and non-point discharges. It is through this public process that permittees can ensure that the formulas and processes used by EPA, and the State, in setting NPDES waste load allocations and related discharge limits are correct and applicable to the sources regulated. DPU is unaware of any other case or law that has disposed of the requirement for EPA and NMED to first establish a TMDL for inclusion of point source NPDES permit discharge limits to meet in-stream water quality standards.

Here EPA seems to circumvent this well-defined process, and instead create its own waste load calculations as found in the EPA provided document titled "NMWQS NM0020141.pdf." As provided in this document, it appears to be EPA's own calculations that Mr. Tung Nguyen developed without public input to come up with the specific NPDES for in-stream water quality discharge limitations for the County's NPDES point source permit. See for example 40 C.F.R. § 122.44(c)(1)(ii) which requires that EPA, "[w]hen determining whether a discharge causes, has the reasonable potential to cause, or contributes to an in-stream excursion above a narrative or numeric criteria within a State water quality standard, the permitting authority shall use procedures which account for existing controls on point and nonpoint sources of pollution, the variability of the pollutant or pollutant parameter in the effluent, the sensitivity of the species to toxicity testing (when evaluating whole effluent toxicity), and where appropriate, the dilution of the effluent in the receiving water."

Unlike the TMDL process, where parties are able to participate in and comment on how EPA and the State allocate certain pollutant loading calculations through the specified public hearing process, EPA has created their own numbers without comment from anyone. It is presumed that NMED provided comments to EPA in calculating the NPDES permit numbers, but that was done outside the public process, and it is unclear what is or is not included in the formulas used by EPA in the referenced document, and NMED has not provided their communications with

EPA or others in regard to an Inspection of Public Records Act request. Such a hidden process in determining in-stream water quality discharge limits appears to be a procedural due process violation under the Administrative Procedures Act (5 U.S.C.S. § 551 *et seq*.) as well as 33 U.S.C. § 1313 and related provisions. Therefore, the inclusion of the in-stream water quality standards in the proposed NPDES as found in the permit is arbitrary and capricious and is not in accordance with law.

DPU would thus request that EPA respond to how it developed the proposed NPDES permit in-stream water quality-based limitations, and under what authority it used to circumvent the TMDL waste load allocation public process and reveal what the spreadsheet calculations and quality checks that are in the EPA spreadsheet.

B. *Compliance with In-Stream WQS is not practical as there is no effective discharge to streams leading to WOTUS*

For the purpose of these comments and considering EPA's previously stated position that EPA can add discharge limitations where it finds the source to have a potential to impact jurisdictional receiving water, see generally EPA's Fact Sheet page 4 of 11, DPU suggests that EPA has not demonstrated what data shows that the proposed in-stream discharge limits will actually correlate to any current or future in-stream water quality change, either by improvement or degradation. This data is required by 40 CFR §122.44(d)(1)(vi). DPU request that EPA provide the data that demonstrates the in-stream permit discharge limits correlate to the NMED's listed impairments. Without such information, DPU is unable to determine on what basis the limitations have to any federal jurisdictional waters.

Another reason DPU would like to understand EPA's rational, is that the WWTP's discharge path, both upstream and downstream of the WWTP, is an ephemeral stream that rarely, if ever, has any visible flow that reaches a jurisdictional water of the United States. Once discharged from the plant's discharge pipe, the flow travels 0.7 miles to a Los Alamos National Laboratory ("LANL") constructed wetland*, which is 1.42 miles in length*, and any flows that may be discharged then travel 4.92 miles to the Rio Grande headwaters. See **Attachment 1**. The wetland was specifically constructed by LANL to address legacy U.S. Department of Energy discharges, *many of which are the same in-stream water quality impairments as identified by*

NMED in its 303b/305d Water Impairment listing as approved by EPA. *See* NMED 2020-2022 Integrated Report, Appendix A.[2]

DPU next presents, in **Attachment 1**, the three stations' flow data from the point of discharge to the two LANL flow monitoring stations directly above and below the LANL wetland. The data clearly shows, from January 1, 2020, to December 1, 2021, there were only 59 days that there was some flow over zero (0) over seven hundred and one (701) days that was then able to travel to federal jurisdictional waters, the Rio Grande. Hence, DPU is greatly concerned on what data EPA is using pursuant to 40 CFR § 122.44, to demonstrate that implementing in-stream water quality based effluent limitations in this permit will impact or even affect in-stream water quality. Without an open and transparent process, similar to that used in the creation of and inclusion of TMDL waste load allocations, DPU is left to only guess how EPA reasonably determined the in-stream discharge limitations.

DPU would request that, pursuant to 40 CFR §122.44, EPA provide their calculations which it considered in setting the proposed permit's in-stream water quality compliance discharge limitations, and that data EPA believes will show that the limits will achieve compliance with the State's listed impairments or prevent degradation.

C. *EPA fails to explain how In-Stream Permit Discharge Limits will change if NMED Changes the State's EPA approved Integrated Report.*

DPU would request that EPA provide the process and procedures it will use to modify any final NPDES permit in-stream discharge limits where, or if, NMED, changes, adds, modifies, or removes listed water quality impairments in its biannual § 303d/305b Integrated Report. Will EPA, similar to EPA's current process of EPA staff calculating the discharge limit, independently and without notice re-calculate discharge limitations and/or add additional permit limits? Does that process contemplate or require a reopener of the permit, including one of notice and comment? Will DPU and other parties be able to provide comment on EPA's methods and calculations?

DPU would appreciate a clear and definite answer from EPA as to how any proposed or future in-stream limits be modified based on external State NMED actions.

[2] Available at https://www.env.nm.gov/surface-water-quality/303d-305b/. Last visited 3/28/2022.

II. Required Sampling and Monitoring for Parameters with no Exceedances.

As provided on page 2 of Part I of the draft permit, EPA is requiring DPU to monitor nineteen (19) parameters that have no discharge limits, and appear to only be for EPA numeric monitoring purposes, *e.g.*, Thallium, total[3] quarterly for the next five years, selenium quarterly for the next five years, cadmium one every six months for the next five years, etc.

It is unclear why EPA requires DPU to collect, sample, and provide results for constituents that have no direct relationship to in-stream water quality standards or relate to actual documented exceedances of the plant. In fact, only four (4) of these parameters are listed impairments on the State's most recent EPA approved 303d/305b Integrated Report. The requirement for DPU to monitor for pollutants that are not a demonstrated water quality impairment seems only to be data collection for EPA and State NMED uses that the agencies would otherwise have to collect, sample, and provide. Putting this burden on a discharger is not only fiscally burdensome but is an unfunded mandate. *See generally Printz v. United States*, 521 U.S. 898, 912 (1997). This is especially true where some tests can cost over a thousand dollars per test.

DPU therefore request that EPA provide the basis for requiring non-compliance monitoring and sampling for pollutants that have not been demonstrated to show an exceedance or remove these from the permit.

III. Metals and Toxin Testing and Reporting Requirements are Unclear and Could Lead to Unintentional Technical Violations of the CWA.

DPU, in review of the sampling and reporting requirements for Dioxin, Manganese, and Copper first notes, as provided above, it is unclear how EPA, using their document titled "NMWQS NM0020141.pdf", established the proposed permits' in-stream discharge limitations using EPA's three-step process, and again requests that EPA take no further action until DPU, and EPA are able to discuss the process used.

For the purposes of this public comment, DPU would, in relation to the three parameters request EPA modify the frequency of testing for dioxin, copper, and manganese for the *entire term* of the permit to once per quarter. This request is made to avoid an inevitable testing violation due

[3] See EPA Fact Sheet, Section I, statement that "Previous limitations for thallium have been removed, but monitoring is required."

to the proposed testing and reporting frequency of once per week for years 1 through 4 and three (3) times per week for year 5.

After reviewing the proposed sampling frequency for these three (3) parameters, DPU found that the laboratory sampling turnaround time for these parameters is approximately fifteen (15) business days from the date of the receipt of the sample.[4] Thus, if DPU were to collect the first week of the month's sample, DPU would not get the results until after the 15th of that month, and for the second week's testing, results would not come back until the end of the month, etc. Because DMR's are due every 30 days, each DMR would be short the last two weeks of any one calendar month. By changing the frequency of testing for these three parameters to once per quarter, DPU can ensure that the 7-day average and daily maximum can be timely collected, sampled, and reported to EPA.

DPU is also concerned with providing dioxin results because of the required 7-day holding time before which time the results are later provided, which makes it impossible to meet the testing and reporting requirements in the draft permit. In order to comply with the permit requirements, DPU employees would be required to travel to Albuquerque every week to deliver the dioxin sample for testing, and the County would still not be in compliance with the permit's current reporting requirements.

In support of DPU's request, DPU would present that previous test for Manganese and Copper show a consistent history of complying with the respective standards, testing more than once per quarter is not necessary. DPU would also note that the proposed testing frequency for dioxin, manganese, and copper would increase cost to the 4,810 households on this treatment facility to $91,520 in the first four years *and $68,640 in the fifth year alone*.[5] This does not include related staff time at 6 hours per day, 26 days per year at an average of $50 per hours, totaling an additional $7,800.

IV. EPA and NMED's Comment Periods Conflict And Do Not Allow For Full Opportunity For Public Comment.

The County expresses concern on the timing of both EPA and State comments related to EPA's issuance of the proposed permit. As provided in the EPA Notice, public comments

[4] As provided by Hall Environmental Analysis Laboratory.
[5] See footnote 3.

are due within 30 days from the date of the publication of the Notice. Here EPA issued the notice on a Friday, January 28, 2022, which did not allow the County the chance to review the draft documents until the next business day 3 days later. Similarly, EPA requires that NMED, submit its review of the draft comment within the same 30-day comment period. *See* 20.6.2.2001 NMAC.

DPU asserts this simultaneous comment period is improper and does not give DPU procedural due process because it is denied the opportunity to comment on NMED's State 401 Certification comments to EPA. It would not be until the after the close of the EPA and NMED public comment period would DPU be able to receive NMED's comments. This denies DPU any ability to comment or challenge NMED's comments to EPA, which EPA will then use to draft the final permit, and it is unclear whether that specific concern would be within the EPA's Environmental Appeals Board ("EAB") jurisdiction to hear and decide. This goes against long established procedural due process rights to which give affected parties the right to address agency actions. *See generally Matthews v. Eldridge*, 424 U.S. 319, 333 (1976) ("The right to be heard before being condemned to suffer grievous loss of any kind, even though it may not involve the stigma and hardships of a criminal conviction, is a principle basic to our society."); *see also State ex rel. Battershell v. City of Albuquerque*, 1989-NMCA-045, ¶ 17, 108 N.M. 658 ("[A]dministrative adjudicatory proceedings involving substantial rights of an applicant must adhere to fundamental principles of justice and procedural due process.").

DPU would request that it be allowed to submit additional public comment on the NMED State 401 Certification prior to finalizing the proposed permit.

In the alternative DPU believes that if the parties were to meet and discuss these concerns raised above, there may be potential to resolve some of DPU's concerns as expressed above.

If EPA is unable to extend the current comment period to allow the parties to meet and discuss DPU's concern, DPU would request a Public Hearing as the issues above constitute a significant degree of public interest.

Attachment- 1

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	**Max (cfs)**	**Max (cfs)**
1/1/2020	2.603	0.388
1/2/2020	2.191	0.364
1/3/2020	2.392	0.339
1/4/2020	2.603	0.388
1/5/2020	2.825	0.438
1/6/2020	3.557	0.498
1/7/2020	3.058	0.438
1/8/2020	3.058	0.438
1/9/2020	2.603	0.413
1/10/2020	3.302	0.388
1/11/2020	3.058	0.468
1/12/2020	3.058	0.438
1/13/2020	3.058	0.468
1/14/2020	3.058	0.438
1/15/2020	3.058	0.364
1/16/2020	3.822	0.468
1/17/2020	3.302	0.438
1/18/2020	3.058	0.364
1/19/2020	3.058	0.364
1/20/2020	3.557	0.413
1/21/2020	3.557	0.438
1/22/2020	3.302	0.413
1/23/2020	3.557	0.364
1/24/2020	3.557	0.413
1/25/2020	3.822	0.388
1/26/2020	4.1	0.438
1/27/2020	4.1	0.468
1/28/2020	4.1	0.388
1/29/2020	3.822	0.364
1/30/2020	4.1	0.364
1/31/2020	3.557	0.339
2/1/2020	4.388	0.364
2/2/2020	4.688	0.468
2/3/2020	4.388	0.413
2/4/2020	4.388	0.413
2/5/2020	4.688	0.339
2/6/2020	5	0.498
2/7/2020	4.388	0.388
2/8/2020	5.295	0.388
2/9/2020	5.295	0.413
2/10/2020	5.295	0.438
2/11/2020	5.6	0.413
2/12/2020	5.914	0.438

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	**Max (cfs)**	**Max (cfs)**
2/13/2020	5.914	0.364
2/14/2020	5.914	0.438
2/15/2020	5.914	0.388
2/16/2020	5.914	0.339
2/17/2020	7.265	0.438
2/18/2020	6.913	0.438
2/19/2020	6.571	0.364
2/20/2020	6.913	0.364
2/21/2020	6.571	0.339
2/22/2020	7.265	0.388
2/23/2020	7.998	0.438
2/24/2020	8.379	0.468
2/25/2020	7.998	0.364
2/26/2020	8.379	0.314
2/27/2020	8.379	0.339
2/28/2020	7.998	0.294
2/29/2020	8.769	0.339
3/1/2020	9.17	0.364
3/2/2020	10	0.438
3/3/2020	10	0.364
3/4/2020	10.646	0.339
3/5/2020	9.58	0.339
3/6/2020	9.17	0.274
3/7/2020	10	0.339
3/8/2020	10.974	0.388
3/9/2020	10.646	0.438
3/10/2020	10.974	0.339
3/11/2020	10.974	0.339
3/12/2020	10.974	0.339
3/13/2020	13.029	0.588
3/14/2020	11.644	0.413
3/15/2020	11.644	0.388
3/16/2020	10.646	0.413
3/17/2020	10.974	0.388
3/18/2020	11.644	0.63
3/19/2020	12.328	0.668
3/20/2020	10.646	0.388
3/21/2020	11.307	0.388
3/22/2020	11.644	0.388
3/23/2020	10	0.388
3/24/2020	10.321	0.314
3/25/2020	10.646	0.314
3/26/2020	10.974	0.364

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	**Max (cfs)**	**Max (cfs)**
3/27/2020	11.644	0.339
3/28/2020	11.307	0.314
3/29/2020	11.307	0.339
3/30/2020	10	0.364
3/31/2020	10.321	0.253
4/1/2020	10.974	0.294
4/2/2020	10.974	0.274
4/3/2020	8.769	0.274
4/4/2020	11.984	0.166
4/5/2020	11.984	0.233
4/6/2020	10.321	0.253
4/7/2020	10.646	0.038
4/8/2020	9.17	0.046
4/9/2020	10.974	0.014
4/10/2020	9.17	0.054
4/11/2020	10	0.012
4/12/2020	11.307	0.012
4/13/2020	11.307	0.233
4/14/2020	9.58	0.182
4/15/2020	10	0.197
4/16/2020	7.627	0.213
4/17/2020	5.914	0.166
4/18/2020	6.238	0.019
4/19/2020	7.998	0.054
4/20/2020	10.974	0.438
4/21/2020	2	0.182
4/22/2020	5.295	0.019
4/23/2020	4.688	0.061
4/24/2020	1.834	0.009
4/25/2020	2.191	0.007
4/26/2020	1.12	0.004
4/27/2020	0.433	0.002
4/28/2020	0	0.002
4/29/2020	0	0.002
4/30/2020	0.467	0.001
5/1/2020	0	0.001
5/2/2020	0	0
5/3/2020	0.267	0
5/4/2020	0.433	0
5/5/2020	0.5	0
5/6/2020	0	0
5/7/2020	0	0
5/8/2020	0	0

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	**Max (cfs)**	**Max (cfs)**
5/9/2020	0	0
5/10/2020	0.1	0
5/11/2020	1.12	0
5/12/2020	0	0
5/13/2020	0	0
5/14/2020	1.12	0
5/15/2020	0.5	0
5/16/2020	1.248	0
5/17/2020	1.383	0
5/18/2020	2.392	0
5/19/2020	2.825	0
5/20/2020	2	0
5/21/2020	1.12	0
5/22/2020	0	0
5/23/2020	0	0
5/24/2020	0	0
5/25/2020	0	0
5/26/2020	0	0
5/27/2020	0.333	0
5/28/2020	0	0
5/29/2020	0	0
5/30/2020	0.3	0
5/31/2020	1.383	0
6/1/2020	1.12	0
6/2/2020	1.248	0
6/3/2020	1.12	0
6/4/2020	0	
6/5/2020	0	
6/6/2020	0	
6/7/2020	0.722	
6/8/2020	1.248	
6/9/2020	0	
6/10/2020	0	
6/11/2020	0	
6/12/2020	0	
6/13/2020	0	
6/14/2020	0	
6/15/2020	0	
6/16/2020	0	
6/17/2020	0	
6/18/2020	0	
6/19/2020	0	
6/20/2020	0	

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	Max (cfs)	Max (cfs)
6/21/2020	0	
6/22/2020	0	
6/23/2020	0	
6/24/2020	0	
6/25/2020	0	
6/26/2020	0	
6/27/2020	0	
6/28/2020	0	
6/29/2020	0	
6/30/2020	0	
7/1/2020	0	
7/2/2020	0	
7/3/2020	0	
7/4/2020	0	
7/5/2020	0	
7/6/2020	0	
7/7/2020	0	
7/8/2020	0	
7/9/2020	0	
7/10/2020	0	
7/11/2020	0	
7/12/2020	0	
7/13/2020	0	
7/14/2020	0	
7/15/2020	0	
7/16/2020	0.033	
7/17/2020	0	
7/18/2020	0	
7/19/2020	0.433	
7/20/2020	1.12	
7/21/2020	0.853	
7/22/2020	0.133	
7/23/2020	0.033	
7/24/2020	0.033	
7/25/2020	0.467	
7/26/2020	1	
7/27/2020	1.248	
7/28/2020	2.191	
7/29/2020	1.383	
7/30/2020	1.525	
7/31/2020	0.1	
8/1/2020	0.722	
8/2/2020	1.248	

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	Max (cfs)	Max (cfs)
8/3/2020	1	
8/4/2020	1.383	
8/5/2020	0.2	
8/6/2020	0.033	
8/7/2020	0	
8/8/2020	0.033	0
8/9/2020	0.167	0
8/10/2020	0	0
8/11/2020	0.267	0
8/12/2020	0	0
8/13/2020	0	0
8/14/2020	0	0
8/15/2020	0	0
8/16/2020	0	0
8/17/2020	0	0
8/18/2020	0.2	0
8/19/2020	0	0
8/20/2020	0.033	0
8/21/2020	0	0
8/22/2020	0	0
8/23/2020	0.1	0
8/24/2020	0	0
8/25/2020	0	0
8/26/2020	0	0
8/27/2020	0	0
8/28/2020	0	0
8/29/2020	0.067	0
8/30/2020	0.433	0
8/31/2020	0.333	0
9/1/2020	0.3	0
9/2/2020	0	0
9/3/2020	0	0
9/4/2020	0	0
9/5/2020	0.033	0
9/6/2020	0.067	0
9/7/2020	0	0
9/8/2020	0.167	0
9/9/2020	0.367	0
9/10/2020	0.5	0
9/11/2020	0.433	0
9/12/2020	0.5	0
9/13/2020	0.5	0
9/14/2020	0.5	0

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	Max (cfs)	Max (cfs)
9/15/2020	2	0
9/16/2020	0.4	0
9/17/2020	0.167	0
9/18/2020	0.2	0
9/19/2020	0	0
9/20/2020	0.467	0
9/21/2020	0.3	0
9/22/2020	0.233	0
9/23/2020	1.248	0
9/24/2020	0.853	0
9/25/2020	0.467	0
9/26/2020	0.722	0
9/27/2020	0	0
9/28/2020	0.067	0
9/29/2020	0	0
9/30/2020	0.3	0
10/1/2020	0.333	0
10/2/2020	0.167	0
10/3/2020	0.2	0
10/4/2020	0.3	0
10/5/2020	0.467	0
10/6/2020	0.4	0
10/7/2020	0.604	0
10/8/2020	0	0
10/9/2020	0	0
10/10/2020	0	0
10/11/2020	0.467	0
10/12/2020	1	0
10/13/2020	1.12	0
10/14/2020	1.12	0
10/15/2020	1.12	0
10/16/2020	0.433	0
10/17/2020	0.722	0
10/18/2020	1.383	0
10/19/2020	1.12	0
10/20/2020	1	0
10/21/2020	1	0
10/22/2020	1.12	0
10/23/2020	0.4	0
10/24/2020	0.722	0
10/25/2020	1.383	0
10/26/2020	1.248	0
10/27/2020	1.383	0

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	Max (cfs)	Max (cfs)
10/28/2020	1.525	0
10/29/2020	1.676	0
10/30/2020	1.676	0
10/31/2020	2	0
11/1/2020	2.392	0
11/2/2020	1.834	0
11/3/2020	0.853	0
11/4/2020	1.383	0
11/5/2020	1.383	0
11/6/2020	1.525	0
11/7/2020	1.834	0
11/8/2020	2.191	0
11/9/2020	2	0
11/10/2020	2.603	0.033
11/11/2020	2	0.054
11/12/2020	1.834	0.046
11/13/2020	1.834	0.061
11/14/2020	2.392	0.197
11/15/2020	2	0.077
11/16/2020	2.191	0.077
11/17/2020	2.392	0.135
11/18/2020	1.676	0.151
11/19/2020	1.383	0.135
11/20/2020	1.383	0.089
11/21/2020	1.676	0.069
11/22/2020	1.834	0.089
11/23/2020	1.834	0.166
11/24/2020	1.834	0.197
11/25/2020	2.191	0.213
11/26/2020	2.825	0.294
11/27/2020	2.191	0.233
11/28/2020	2.392	0.294
11/29/2020	2.392	0.274
11/30/2020	2	0.274
12/1/2020	2	0.253
12/2/2020	1.676	0.253
12/3/2020	2	0.294
12/4/2020	2.191	0.668
12/5/2020	2.392	0.314
12/6/2020	2.603	0.339
12/7/2020	2.191	0.294
12/8/2020	2.392	0.294
12/9/2020	3.058	0.413

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	**Max (cfs)**	**Max (cfs)**
12/10/2020	3.058	0.468
12/11/2020	2.603	0.438
12/12/2020	2.191	0.438
12/13/2020	2.392	0.438
12/14/2020	2.392	0.528
12/15/2020	2.603	0.468
12/16/2020	2.392	0.528
12/17/2020	2.392	0.558
12/18/2020	1.834	0.388
12/19/2020	2.392	0.468
12/20/2020	2.191	0.468
12/21/2020	2.392	0.468
12/22/2020	2.603	0.498
12/23/2020	2.191	0.438
12/24/2020	2.392	0.498
12/25/2020	1.834	0.438
12/26/2020	2.191	0.63
12/27/2020	2.191	0.528
12/28/2020	2.392	0.468
12/29/2020	2	0.438
12/30/2020	2.392	0.438
12/31/2020	2.603	0.498
1/1/2021	2.191	1.003
1/2/2021	2.603	0.468
1/3/2021	2.392	0.438
1/4/2021	3.302	0.528
1/5/2021	3.557	0.528
1/6/2021	3.302	0.498
1/7/2021	3.302	0.498
1/8/2021	2.825	0.468
1/9/2021	2.603	0.468
1/10/2021	3.302	0.468
1/11/2021	3.557	0.468
1/12/2021	3.302	0.498
1/13/2021	3.557	0.735
1/14/2021	3.822	0.438
1/15/2021	3.822	0.468
1/16/2021	4.1	0.528
1/17/2021	4.1	0.498
1/18/2021	4.1	0.498
1/19/2021	5	0.498
1/20/2021	3.058	0.468
1/21/2021	3.822	0.528

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	**Max (cfs)**	**Max (cfs)**
1/22/2021	4.388	0.498
1/23/2021	6.238	0.498
1/24/2021	6.238	0.528
1/25/2021	5.6	0.558
1/26/2021	4.1	0.558
1/27/2021	5.295	0.63
1/28/2021	4.1	0.468
1/29/2021	4.688	0.498
1/30/2021	4.688	0.498
1/31/2021	4.688	0.498
2/1/2021	5	0.498
2/2/2021	4.388	0.468
2/3/2021	4.1	0.468
2/4/2021	5	0.438
2/5/2021	6.238	0.528
2/6/2021	5.914	0.468
2/7/2021	5.914	0.498
2/8/2021	4.688	0.438
2/9/2021	3.822	0.438
2/10/2021	3.822	0.413
2/11/2021	4.688	0.438
2/12/2021	5	0.438
2/13/2021	5	0.498
2/14/2021	4.688	0.468
2/15/2021	5.6	0.528
2/16/2021	5	0.498
2/17/2021	4.688	0.498
2/18/2021	5.295	0.498
2/19/2021	4.688	0.498
2/20/2021	5	0.528
2/21/2021	5	0.498
2/22/2021	5	0.498
2/23/2021	5	0.468
2/24/2021	5	0.498
2/25/2021	4.1	0.438
2/26/2021	5	0.498
2/27/2021	4.1	0.468
2/28/2021	4.688	0.498
3/1/2021	5.914	0.558
3/2/2021	5.295	0.528
3/3/2021	7.265	0.528
3/4/2021	7.265	0.438
3/5/2021	5.295	0.438

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	**Max (cfs)**	**Max (cfs)**
3/6/2021	6.238	0.438
3/7/2021	7.265	0.438
3/8/2021	5.295	0.438
3/9/2021	5	0.438
3/10/2021	5.914	0.438
3/11/2021	6.238	0.413
3/12/2021	6.913	0.438
3/13/2021	6.571	0.468
3/14/2021	6.913	0.468
3/15/2021	6.913	0.468
3/16/2021	6.238	0.438
3/17/2021	6.571	0.413
3/18/2021	6.571	0.413
3/19/2021	5	0.339
3/20/2021	5.295	0.274
3/21/2021	5.6	0.274
3/22/2021	4.688	0.274
3/23/2021	6.238	0.413
3/24/2021	6.913	0.438
3/25/2021	5.914	0.364
3/26/2021	5.6	0.339
3/27/2021	5.914	0.294
3/28/2021	5.914	0.314
3/29/2021	5.6	0.314
3/30/2021	5.295	0.294
3/31/2021	3.822	0.151
4/1/2021	4.388	0.213
4/2/2021	4.1	0.233
4/3/2021	10	0.388
4/4/2021	5.6	0.339
4/5/2021	6.913	0.253
4/6/2021	5.914	0.197
4/7/2021	5.6	0.135
4/8/2021	5.295	0.069
4/9/2021	4.688	0.089
4/10/2021	4.388	0.077
4/11/2021	6.238	0.253
4/12/2021	5.914	0.274
4/13/2021	4.688	0.182
4/14/2021	5	0.123
4/15/2021	4.688	0.123
4/16/2021	5.6	0.135
4/17/2021	6.571	0.253

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	**Max (cfs)**	**Max (cfs)**
4/18/2021	7.265	0.339
4/19/2021	5.914	0.339
4/20/2021	5.914	0.233
4/21/2021	5.6	0.112
4/22/2021	4.688	0.038
4/23/2021	4.1	0.024
4/24/2021	4.688	0.009
4/25/2021	5.295	0.038
4/26/2021	3.822	0.038
4/27/2021	1.383	0.002
4/28/2021	3.557	0.002
4/29/2021	5	0.002
4/30/2021	2.191	0.001
5/1/2021	3.058	0.001
5/2/2021	4.1	0.012
5/3/2021	0.3	0.001
5/4/2021	3.822	0
5/5/2021	4.388	0
5/6/2021	1.676	0
5/7/2021	1	0
5/8/2021	1.248	0
5/9/2021	1.676	0
5/10/2021	2.191	0
5/11/2021	2.392	0
5/12/2021	1.834	0
5/13/2021	1.248	0
5/14/2021	1.525	0
5/15/2021	1.383	0
5/16/2021	1.525	0
5/17/2021	1.834	0
5/18/2021	2.191	0
5/19/2021	2.392	0
5/20/2021	3.058	0
5/21/2021	2.191	0
5/22/2021	1.248	0
5/23/2021	2.191	0
5/24/2021	1.12	0
5/25/2021	1.248	0
5/26/2021	0	0
5/27/2021	0	0
5/28/2021	0	0
5/29/2021	0.4	0
5/30/2021	0.604	0

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	**Max (cfs)**	**Max (cfs)**
5/31/2021	1.12	0
6/1/2021	1.676	0
6/2/2021	1.676	0
6/3/2021	2.191	0
6/4/2021	1.525	0
6/5/2021	1.383	0
6/6/2021	1	0
6/7/2021	1.12	0
6/8/2021	1.248	0
6/9/2021	0	0
6/10/2021	0	0
6/11/2021	0	0
6/12/2021	0	0
6/13/2021	0	0
6/14/2021	0	0
6/15/2021	0	0
6/16/2021	0	0
6/17/2021	0	0
6/18/2021	0	0
6/19/2021	0	0
6/20/2021	0	0
6/21/2021	0	0
6/22/2021	0	0
6/23/2021	0	0
6/24/2021	0	0
6/25/2021	0	0
6/26/2021	0	0
6/27/2021	0	0
6/28/2021	0.467	0
6/29/2021	1	0
6/30/2021	0.5	0
7/1/2021	0.3	0
7/2/2021	0.367	0
7/3/2021	0.367	0
7/4/2021	0.367	0
7/5/2021	0.367	0
7/6/2021	0.267	0
7/7/2021	0.2	0
7/8/2021	0.2	0
7/9/2021	0.1	0
7/10/2021	0	0
7/11/2021	0.167	0
7/12/2021	0.3	0

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	Max (cfs)	Max (cfs)
7/13/2021	0.433	0
7/14/2021	1.383	0
7/15/2021	0	0
7/16/2021	0	0
7/17/2021	0.133	0
7/18/2021	0.367	0
7/19/2021	0.433	0
7/20/2021	0.722	0
7/21/2021	2.603	0
7/22/2021	1.676	0
7/23/2021	1.834	0
7/24/2021	1.525	0
7/25/2021	2	0
7/26/2021	1.525	0
7/27/2021	2.191	0
7/28/2021	1.525	0
7/29/2021	1	0
7/30/2021	3.822	0
7/31/2021	1.12	0
8/1/2021	1.834	0
8/2/2021	2.825	0
8/3/2021	2.392	0
8/4/2021	2.603	0
8/5/2021	1.383	0
8/6/2021	1.383	0
8/7/2021	2.392	0
8/8/2021	3.822	0
8/9/2021	3.822	0
8/10/2021	1.12	0
8/11/2021	1.676	0
8/12/2021	2	0
8/13/2021	0.722	0
8/14/2021	1.383	0
8/15/2021	4.388	0
8/16/2021	3.058	0
8/17/2021	5.6	0
8/18/2021	5.295	0
8/19/2021	4.1	0
8/20/2021	1.12	0
8/21/2021	1.383	0
8/22/2021	2.191	0
8/23/2021	2	0
8/24/2021	2	0

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	Max (cfs)	Max (cfs)
8/25/2021	1.383	0
8/26/2021	2	
8/27/2021	0.033	
8/28/2021	5.914	
8/29/2021	5.6	
8/30/2021	2.392	
8/31/2021	3.822	0
9/1/2021	3.822	0
9/2/2021	6.238	0
9/3/2021	6.238	0
9/4/2021	5.295	0
9/5/2021	3.822	0
9/6/2021	6.571	0
9/7/2021	6.913	0
9/8/2021	4.388	0
9/9/2021	0	0
9/10/2021	0	0
9/11/2021	0.433	0
9/12/2021	1	0
9/13/2021	1	0
9/14/2021	1.12	0
9/15/2021	1.383	0
9/16/2021	1.676	0
9/17/2021	0.5	0
9/18/2021	3.557	0
9/19/2021	7.265	0
9/20/2021	7.265	0
9/21/2021	5.295	0
9/22/2021	2.825	0
9/23/2021	2.825	0
9/24/2021	1.525	0
9/25/2021	1.676	0
9/26/2021	3.302	0
9/27/2021	3.557	0
9/28/2021	5.6	0
9/29/2021	5.295	0
9/30/2021	7.627	0
10/1/2021	7.265	0
10/2/2021	7.265	0
10/3/2021	8.379	0
10/4/2021	8.769	0
10/5/2021	10.974	0
10/6/2021	10.321	0

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	Max (cfs)	Max (cfs)
10/7/2021	7.998	0
10/8/2021	7.627	0
10/9/2021	6.571	0
10/10/2021	7.998	0
10/11/2021	10	0
10/12/2021	9.17	0
10/13/2021	8.379	0
10/14/2021	9.58	0
10/15/2021	7.627	0
10/16/2021	6.571	0
10/17/2021	8.769	0
10/18/2021	7.998	0
10/19/2021	10.321	0
10/20/2021	9.17	0
10/21/2021	8.769	0
10/22/2021	6.571	0
10/23/2021	6.913	0
10/24/2021	10	0
10/25/2021	8.769	0
10/26/2021	9.17	0
10/27/2021	10	0
10/28/2021	9.58	0
10/29/2021	8.379	0
10/30/2021	7.627	0
10/31/2021	8.379	0
11/1/2021	3.822	0
11/2/2021	4.388	0
11/3/2021	4.388	0
11/4/2021	4.388	0
11/5/2021	4.388	0
11/6/2021	5	0
11/7/2021	6.238	0
11/8/2021	6.238	0
11/9/2021	4.688	0
11/10/2021	7.265	0
11/11/2021	7.265	0
11/12/2021	8.769	0
11/13/2021	9.58	0
11/14/2021	11.307	0
11/15/2021	11.984	0
11/16/2021	11.307	0.009
11/17/2021	11.307	0.019
11/18/2021	12.328	0.028

LANL Station	E059.5	E059.8
Locattion	*Pueblo Below LAC WWTF*	*Pueblo Below Wetlands*
Date	Max (cfs)	Max (cfs)
11/19/2021	10.646	0.038
11/20/2021	12.677	0.069
11/21/2021	14.846	0.123
11/22/2021	14.846	0.151
11/23/2021	16.756	0.213
11/24/2021	10.974	0.1
11/25/2021	11.307	0.054
11/26/2021	9.17	0.046
11/27/2021	9.58	0.038
11/28/2021	10.974	0.054
11/29/2021	12.328	0.112
11/30/2021	10.974	0.069
12/1/2021	11.984	0.112

E0601

Pueblo below Grade Control Structure
Max (cfs)
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E0601

Pueblo below Grade Control Structure
Max (cfs)
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E0601

Pueblo below Grade Control Structure
Max (cfs)
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E0601

Pueblo below Grade Control Structure
Max (cfs)
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E0601

Pueblo below Grade Control Structure
Max (cfs)
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E0601

Pueblo below Grade Control Structure
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0.037
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E0601
Pueblo below Grade Control Structure
Max (cfs)
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2.49
1.072

E0601

Pueblo below Grade Control Structure
Max (cfs)
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E0601

Pueblo below Grade Control Structure
Max (cfs)
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E0601
Pueblo below Grade Control Structure
Max (cfs)
1.906
0.525
0.266
0.165
0.166
0.167
0.202
0.059
0.097
0.098
0.062
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0.644
0.105
0.482
0.313
0.253
0.187
0.116
0.117
0.257
0.191
0.192
0.686
0.368
0.602
0.295
0.162

E0601
Pueblo below Grade Control Structure
Max (cfs)
0.015
0.09
0.13
0.017
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0.095
0.095
0.06
0.172
0.273
0.101
0.138
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E0601
Pueblo below Grade Control Structure
Max (cfs)
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0.139
1.53
0.065
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E0601
Pueblo below Grade Control Structure
Max (cfs)
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E0601
Pueblo below Grade Control Structure
Max (cfs)
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E0601

Pueblo below Grade Control Structure
Max (cfs)
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6.958
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E0601
Pueblo below Grade Control Structure
Max (cfs)
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E0601

Pueblo below Grade Control Structure
Max (cfs)
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