

**NPDES PERMIT NO. NM0028088**  
**RESPONSE TO COMMENTS**

RECEIVED ON THE SUBJECT DRAFT NATIONAL POLLUTANT DISCHARGE  
ELIMINATION SYSTEM (NPDES) PERMIT IN ACCORDANCE WITH REGULATIONS  
LISTED AT 40 CFR 124.17

APPLICANT: Glorieta Adventure Camps  
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ISSUING OFFICE: U.S. Environmental Protection Agency  
Region 6  
1201 Elm Street  
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PERMIT ACTION: Final permit decision and response to comments received on the proposed  
NPDES permit publicly noticed on July 22, 2023.

DATE PREPARED: September 6, 2023

Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40,  
Code of Federal Regulations, revised as of September 28, 2015.

## 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
CaCO <sub>3</sub>	Calcium carbonate
CBOD	Carbonaceous biochemical oxygen demand (five-day unless noted otherwise)
CD	Critical dilution
CFR	Code of Federal Regulations
cfs	Cubic feet per second
CFU	Colony forming units
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
ICIS	Integrated Compliance Information System
mg/l	Milligrams per liter
ug/l	Micrograms per liter
MGD	Million gallons per day
MPN	Most probable number
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	Publicly owned treatment works
RP	Reasonable potential
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

## **SUBSTANTIAL CHANGES FROM DRAFT PERMIT**

None

## **STATE CERTIFICATION**

In a letter from Shelly Lemon, Bureau Chief, SWQB, to Mr. Charles Maguire, Director, dated September 5, 2023, the NMED certified that the discharge will comply with the applicable provisions of Section 208(e), 301, 301, 303, 306 and 307 of the Clean Water Act and with appropriate requirements of State law.

The NMED stated that in order to meet the requirements of State law, including water quality standards and appropriate basin plan as may be amended by the water quality management plan, each of the conditions cited in the draft permit and the State certification shall not be made less stringent.

The State also stated that it reserves the right to amend or revoke this certification if such action is necessary to ensure compliance with the State's water quality standards and water quality management plan.

### **Condition of Certification**

None

### **Comments that are not Conditions of Certification**

#### **Comment No. 1:**

In Part 1, Section A. Limitations and Monitoring Requirements the Pollutants PFAS Analytes, Effluent, PFAS Analytes, influent, and PFAS Analytes, sludge have a sample type of composite. NMED requests that the sample type be a grab sample following the recommendation found in EPA draft method 1633, Section 8 Sample collection, preservation, storage and holding times (<https://www.epa.gov/cwa-methods/cwa-analytical-methods-and-polyfluorinated-alkylsubstances-pfas#draft-method-1633>).

#### **Response No. 1:**

The EPA agrees. In Part 1, Section A. Limitations and Monitoring Requirements, the pollutants PFAS Analytes, Effluent, PFAS Analytes, influent, and PFAS Analytes, sludge, as suggested, now have a sample type of grab in the final permit.

**Comment No. 2:**

In Part 1, Section A. Limitations and Monitoring Requirements footnote \*14 needs to add the email address NMENV-PFAS-DATA@env.nm.gov. The footnote should state *“PFAS Analysis data should be submitted annually to NMED (See Part III.D.IV) and NMENV-PFAS-DATA@env.nm.gov. The data submittal should include the electronic data deliverable and sampling narrative report provided by the analytical laboratory used to complete the analysis. NMED PFAS sampling standard operating procedures (SOPs) can be found at <https://www.env.nm.gov/surface-waterquality/sop/>. ”*

**Response No. 2:**

The EPA agrees. The NMED suggested language has been included in the final permit, under footnote \*14.

**Comment No. 3:**

In Part I, Section C. Monitoring and Reporting (Minor Dischargers), NMED requests the additional reference to 40 CFR 127.16 be added for reference to the electronic reporting requirement.

**Response No. 3:**

The EPA agrees. The 40 CFR127.16 reference, as suggested, has been included in the Part I, Section C.2. of the final permit.