



REGION 6
DALLAS, TX 75270

April 24, 2026

TRANSMITTED VIA EMAIL

Gary Whitehead
City Manager
City of Truth or Consequences
505 Sims Street
City of Truth or Consequences, New Mexico 87901
gwhitehead@torcnm.org

Re: Administrative Order; Docket Number: CWA-06-2026-1771
NPDES Permit Number: NM0020681

Dear Mr. Whitehead:

Enclosed is Administrative Order (AO), Docket Number CWA-06-2026-1771, issued to the City of Truth or Consequences Wastewater Treatment Plant (WWTP) for violations of the Clean Water Act (CWA), 33 U.S.C. § 1251 *et seq.* The violations are for failure to meet permit effluent limits, submit testing results, and properly operate and maintain the WWTP. The AO incorporates the *Project Schedule* submitted to EPA on January 26, 2026, as part of the previous AO (Docket # CWA-06-2025-1746). The AO also incorporates requirements to address other violations found during an inspection conducted on January 29, 2026, and review of the required report submittals. The first compliance deadline for the AO is May 15, 2026.

The AO does not assess a monetary penalty; however, it does require compliance with applicable federal regulations. The first compliance deadline is thirty (30) days from the effective date of this letter. The United States Environmental Protection Agency (EPA) is committed to ensuring compliance with the requirements of the National Pollutant Discharge Elimination System (NPDES) program and my staff will assist you in any way possible. Please reference AO Docket Number CWA-06-2026-1771, and NPDES Permit Number NM0020681, on your response. If you have any questions, please contact Ms. Rachel Matthews, of my staff, at (214) 665-8589 or at matthews.rachel@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Cheryl T. Seager".

Digitally signed by CHERYL
SEAGER
Date: 2026.04.24 07:40:28
-05'00'

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Enclosure(s)

e.c. Jamie Foreman
Regulatory and Compliance Specialist Water/ Wastewater
City of Truth or Consequences
jforeman@torcnm.org

Ms. Johanna Munoz
Executive Assistant
City of Truth or Consequences
jmunoz@torcnm.org

Ms. Shelly Lemon
NMED Water Bureau Chief
Shelly.Lemon@env.nm.gov

Ms. Susan LucasKamat
NMED Surface Water Quality Bureau
Susan.LucasKamat@env.nm.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

FINDINGS OF VIOLATION AND COMPLIANCE ORDER

Docket Number: CWA-06-2026-1771; NPDES Permit Number: NM0020681

STATUTORY AUTHORITY

The following findings are made, and Order issued, under the authority vested in the Administrator of the United States Environmental Protection Agency (EPA), by Section 309(a) of the Clean Water Act (the Act), 33 U.S.C. § 1319(a). The Administrator of EPA has delegated the authority to issue this Order to the Regional Administrator of EPA Region 6, who has further delegated this authority to the Director of the Enforcement and Compliance Assurance Division.

FINDINGS

1. The City of Truth or Consequences (Respondent) is a "person," as that term is defined at Section 502(5) of the Act, 33 U.S.C. § 1362(5), and 40 C.F.R. § 122.2.
2. At all times relevant to this Order (all relevant times), Respondent owned or operated a wastewater treatment plant (facility) located at 1595 Animal Shelter Road, in the City of Truth or Consequences, Sierra County, New Mexico, 87901 and is therefore an "owner or operator" within the meaning of 40 C.F.R. § 122.2.
3. At all relevant times, the facility acted as a "point source" of a "discharge" of "pollutants" with its wastewater discharge to Rio Grande River in Segment 20.6.4.103 of the Middle Rio Grande Basin, which is a "water of the United States" within the meaning of Section 502 of the Act, 33 U.S.C. § 1362, and 40 C.F.R. § 122.2.
4. Because Respondent owned or operated a facility that acted as a point source of discharges of pollutants to waters of the United States, Respondent and the facility were subject to the Act and the National Pollutant Discharge Elimination System (NPDES) program.
5. Under Section 301 of the Act, 33 U.S.C. § 1311, it is unlawful for any person to discharge any pollutant from a point source to waters of the United States, except with the authorization of, and in compliance with, an NPDES permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342.
6. Section 402(a) of the Act, 33 U.S.C. § 1342(a), provides that the Administrator of EPA may issue permits under the NPDES program for the discharge of pollutants from point sources to waters of the United States. Any such discharge is subject to the specific terms and conditions prescribed in the applicable permit.

7. Respondent applied for and was issued NPDES Permit No. NM0020681 (permit) under Section 402 of the Act, 33 U.S.C. § 1342, which became effective on April 1, 2022, with an expiration date of March 31, 2027. At all relevant times, Respondent was authorized to discharge pollutants from the facility to waters of the United States only in compliance with the specific terms and conditions of the permit.

8. Part I.A. of the permit places certain limitations on the quality and quantity of effluent discharged by Respondent, as specified in Attachment A, which is incorporated herein by reference.

9. Pursuant to Parts I.A, I.C, and II.D of the permit, Respondent is required to sample and test its effluent and monitor its compliance with permit conditions according to specific procedures, in order to determine the facility's compliance or noncompliance with the permit and applicable regulations. The permit also requires Respondent to file certified monthly Discharge Monitoring Reports (DMRs) and Whole Effluent Toxicity (WET) Reports.

10. Pursuant to Part III.B. of the permit, Respondent is required to properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by Respondent as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants and will achieve compliance with the conditions of the permit.

11. Pursuant to Part III.C of the permit, Respondent is required to conduct monitoring according to specified test procedures, calibrate and perform maintenance procedures on all monitoring and analytical instruments, and have an adequate analytical quality control program.

12. On January 17, 2025, EPA issued Administrative Order (AO) Docket Number CWA-06-2025-1712, which cited multiple violations of the permit. The AO required Respondent to eliminate violations or submit a comprehensive plan to eliminate violations.

13. Respondent submitted a comprehensive plan to bring the facility into compliance. The plan was incorporated into AO Docket Number CWA-06-2025-1746, issued on May 13, 2025, and included multiple tasks including the following specifications for construction design planning:

- *Submit detailed plans and timeline for weir replacement, and*
- *Submit a detailed timeline for the rehabilitation, or replacement, of the headworks, including dates for the 30/60/90% completion construction and final construction design plans, provided by consultants.*

14. On January 26, 2026, a Project Schedule for construction design was submitted that included a timeline for both weir replacement and headworks construction. See Attachment B.

15. On January 29, 2026, an inspection of the facility was conducted by New Mexico Environment Department (NMED) inspectors, on behalf of EPA. The inspection report is included in Attachment C, which is incorporated herein by reference.

16. As a result of the inspection, it was found that Part III.B.3 of the permit was violated in that Respondent failed to:

[P]roperly operate and maintain all facilities and systems . . . as efficiently as possible . . . and . . . achieve compliance with the conditions of th[e] permit. Proper operation and maintenance . . . includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities

17. A compliance review found that DMRs filed by Respondent show continued discharges of pollutants from the facility that exceed the permitted effluent limitations established in the permit, as specified in Attachment D, which is incorporated herein by reference.

18. The compliance review found that quarterly WET Reports have not been submitted for July 2025 or January 2026, as specified in Attachment E, which is incorporated herein by reference.

19. This AO includes several long-term tasks from the Project Schedule submitted as required by Docket Number CWA-06-2025-1746. Those tasks have been incorporated under paragraph C.

20. Each violation of the conditions of the permit described above was a violation of Section 301 of the Act, 33 U.S.C. § 1311.

SECTION 309(a)(3) COMPLIANCE ORDER

21. Based on the foregoing Findings and pursuant to the authority of Section 309(a)(3) of the Act, 33 U.S.C. §1319(a)(3), EPA hereby orders Respondent to take the following actions:

A. Immediately take all measures as necessary to comply with permit conditions and effluent limits.

B. No later than May 15, 2026, submit a list of specific actions taken to correct the Areas of Concern listed in the inspection report from the January 29, 2026 inspection that are not specifically addressed in the Task list below.

C. Respondent shall accomplish the following tasks and comply with the following schedule of activities:

TASK		DUE DATE
1.	Submit missing WET Reports. If WET tests have not been completed, submit plan to complete missing tests.	May 15, 2026
2.	Repair, or submit plan to repair, the backup generator.	May 15, 2026
3.	Submit copy of the comprehensive design plan(s) for all WWTP improvements indicating 60% of the engineering design is complete.	September 15, 2026
4.	Submit copy of the comprehensive design plan(s) for all WWTP improvements indicating 95% of the engineering design is complete.	November 10, 2026
5.	Submit a draft 5-year Capital Improvement Plan (CIP) for WWTP repairs.	November 10, 2026
6.	Submit final copy of the comprehensive design plan(s) for all WWTP improvements indicating engineering design is complete.	December 31, 2026
7.	Submit final 5-year CIP for repairs.	January 15, 2027
8.	Submit a copy of the final construction report, including punch list.	June 30, 2028

D. Respondent shall submit Quarterly Progress Reports that are due on the 20th day of the months of January, April, July, and October. Each report shall provide, from the previous three (3) calendar months and for each task in paragraph B above, the following until task completion:

- i. A description of task implementation and percent completion estimate,
- ii. A description of problems encountered and solutions,
- iii. Documented itemized costs of the project tasks,
- iv. Photographs of construction project activities.

E. In the Quarterly Progress Reports, Respondent shall sign and certify, under penalty of law, that the information contained in such report is true, accurate, and not misleading by signing the following statement:

I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all its attachments, and that based on my inquiry of those individuals immediately responsible for obtaining information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

F. If Respondent would like to arrange a meeting with EPA to discuss the violations alleged in this Order, Respondent should contact EPA within thirty (30) days of the effective date of this Order. The meeting will be held at the Region 6 offices, 1201 Elm St., Dallas, Texas, or through a virtual platform, as appropriate, and Respondent can provide any information it believes is relevant to this Order. Respondent shall submit to EPA all information or materials it considers relevant to EPA at least ten (10) days prior to the meeting. To arrange a meeting, or comment on this matter, please contact Rachel Matthews at (214) 665-8589.

G. All information, and/or correspondence, shall be electronically submitted to:

Ms. Rachel Matthews
matthews.rachel@epa.gov

GENERAL PROVISIONS

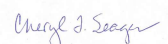
Respondent may seek federal judicial review of this Order pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

Issuance of this Section 309(a)(3) Compliance Order shall not be deemed an election by EPA to waive any administrative, judicial, civil or criminal action to seek penalties, fines or other relief under the Act for the violations cited herein, or other violations that become known to EPA. EPA reserves the right to seek any remedy available under the law that it deems appropriate.

Failure to comply with this Section 309(a)(3) Compliance Order or the Act may result in further administrative action, or a civil judicial action initiated by the United States Department of Justice.

This Order does not constitute a waiver or modification of the terms or conditions of Respondent's NPDES permit, which remain in full force and effect. Compliance with the terms and conditions of this Order does not relieve Respondent of its obligation to comply with any applicable federal, state, or local law or regulation.

The effective date of this Order is the date it is received by Respondent.

 Digitally signed by CHERYL
SEAGER
Date: 2026.04.22 16:06:06
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Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Attachment A
Docket Number
CWA-06-2026-1771

PART I – REQUIREMENTS FOR NPDES PERMITS

A. LIMITATIONS AND MONITORING REQUIREMENTS

1. OUTFALL 001 - FINAL Effluent Limits – 1.06 MGD Design Flow

During the period beginning the effective date of the permit and lasting through the expiration date of the permit (unless otherwise noted), the permittee is authorized to discharge treated domestic wastewater from Outfall 001 to Rio Grande River. Such discharges shall be limited and monitored by the permittee and reported as specified below:

POLLUTANT	DISCHARGE LIMITATIONS MINIMUM	DISCHARGE LIMITATIONS MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH	6.6 s.u.	9.0 s.u.	Daily	Instantaneous Grab (*3)
DO (*6)	6 mg/L	N/A	Weekly	Instantaneous Grab (*3)

POLLUTANT	30-DAY AVG, lbs/day, unless noted	7-DAY AVG lbs/day, unless noted	30-DAY AVG mg/l, unless noted (*1)	7-DAY AVG mg/l, unless noted (*1)	DAILY MAX mg/l, unless noted (*1)	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	Report MGD	Report MGD	N/A	N/A	N/A	Daily	Totalized meter
BOD ₅	176	265	20	30	N/A	Weekly	6-hr Composite
TSS	265	398	30	45	N/A	Weekly	6-hr Composite
BOD ₅ % removal, minimum	≥85 (*2)	N/A	N/A	N/A	N/A	Monthly	Calculation
TSS % removal, minimum	≥85 (*2)	N/A	N/A	N/A	N/A	Monthly	Calculation
TRC	N/A	N/A	N/A	N/A	11 ug/l (*4)	Daily	Instantaneous Grab (*3)
E. coli bacteria	NA	N/A	548 cfu (or MPN)/100 ml (*5)	N/A	2,507 cfu (or MPN)/100 ml	Weekly	Grab
Hexachlorobenzene, interim limit (*7, *8)	5.48E-02	N/A	6.2 ug/l	N/A	NA	Weekly	Grab
Hexachlorobenzene, final limit (*8, *9)	5.43E-05	8.15E-05 daily max	6.14E-03 ug/l	N/A	9.21E-03 ug/l	3/Week	Grab
Cadmium, Total	0.01	0.02	1.55 ug/L	N/A	2.32 ug/L	3/Week	Grab
Acrylonitrile	0.1	0.15	11.65 ug/L	N/A	17.48 ug/L	Weekly	Grab
Total Phosphorus	N/A	N/A	N/A	N/A	Report	Quarterly	6-hr Composite
Total Nitrogen	N/A	N/A	N/A	N/A	Report	Quarterly	6-hr Composite

WHOLE EFFLUENT TOXICITY TESTING 7-DAY CHRONIC NOEC FRESHWATER (*10)	VALUE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Ceriodaphnia dubia	Report	Quarterly	24-hr Composite
Pimephales promelas	Report	Quarterly	24-hr Composite

Footnotes:

*1 See **Appendix A of Part II** of the permit for minimum quantification limits.

*2 Percent removal is calculated using the following equation:

$$\text{Percent removal} = \frac{\text{average monthly influent concentration } \left(\frac{\text{mg}}{\text{L}}\right) - \text{average monthly effluent concentration } \left(\frac{\text{mg}}{\text{L}}\right)}{\text{average monthly influent concentration } \left(\frac{\text{mg}}{\text{L}}\right)} \times 100$$

*3 Analyzed within 15 minutes of collection.

*4 The effluent limitation for TRC is the instantaneous maximum and cannot be averaged for reporting purposes.

*5 The geometric mean of E. coli bacteria shall be used for reporting the 30-day average values.

*6 Field kit (probe) can be used to measure.

*7 Interim limitations are expired on first day of 4th year from the permit effective date.

*8 EPA Method 612 (or approved method under 40 CFR 136.3 with MDL/ML of 0.05 ug/L or lower) shall be used for analysis.

*9 Limitations shall be effective beginning first day of 4th year from the permit effective date.

*10 Monitoring and reporting requirements begin on the effective date of this permit. See Part II of the permit for WET testing requirements for additional WET monitoring and reporting conditions. Grab samples are allowed per method, if needed.

Attachment B

Docket Number: CWA-06-2026-1771

EXHIBIT A - PROJECT SCHEDULE

ID	Task Name	Duration	Start	Finish	Predecessors	Half 1, 2026					Half 2, 2026					Half 1, 2027					Half 2, 2027					Half 1, 2028																		
						J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A											
1	<u>TorC WWTP HEADWORKS AND CLARIFIER IMPROVEMENTS</u>	564 days	Mon 2/2/26	Thu 3/30/28																																								
2	<u>PRE-DESIGN PHASE</u>	16 days	Mon 2/2/26	Mon 2/23/26																																								
3	Contract Award Notice	1 day	Mon 2/2/26	Mon 2/2/26																																								
4	Internal Project Start-Up	10 days	Tue 2/3/26	Mon 2/16/26	3																																							
5	Project Kickoff Meeting	5 days	Tue 2/17/26	Mon 2/23/26	4																																							
6	<u>DESIGN PHASE</u>	206 days	Tue 2/24/26	Tue 12/8/26																																								
7	Supplemental Site Data Acquisition	25 days	Tue 2/24/26	Mon 3/30/26																																								
8	Data Gathering, Identify Field Confirmations Needed	15 days	Tue 2/24/26	Mon 3/16/26	5																																							
9	Field Verifications of Record Drawings, Updates to Conditions	10 days	Tue 3/17/26	Mon 3/30/26	8																																							
10	60% Design	70 days	Tue 3/31/26	Mon 7/6/26																																								
11	Prepare 60% Design Plans, Cost Estimate	40 days	Tue 3/31/26	Mon 5/25/26	9																																							
12	Owner 60% Review Period	10 days	Tue 5/26/26	Mon 6/8/26	11																																							
13	NMED & EPA Review Period	20 days	Tue 6/9/26	Mon 7/6/26	12																																							
14	95% Design	70 days	Tue 7/7/26	Mon 10/12/26																																								
15	Prepare 95% Design Plans, Specifications, Cost Estimate	40 days	Tue 7/7/26	Mon 8/31/26	13																																							
16	Owner 95% Review Period	10 days	Tue 9/1/26	Mon 9/14/26	15																																							
17	NMED & EPA Review Period	20 days	Tue 9/15/26	Mon 10/12/26	16																																							
18	Final Stamped Design	41 days	Tue 10/13/26	Tue 12/8/26																																								
19	Prepare Stamped Design Plans, Specifications, Cost Estimate	20 days	Tue 10/13/26	Mon 11/9/26	17																																							
20	NMED & EPA Approval Period	20 days	Tue 11/10/26	Mon 12/7/26	19																																							
21	Approval to Bid	1 day	Tue 12/8/26	Tue 12/8/26	20																																							
22	<u>CONSTRUCTION PHASE</u>	343 days	Tue 12/8/26	Thu 3/30/28																																								
23	Advertising Period	25 days	Tue 12/8/26	Mon 1/11/27	20																																							
24	Contractor Bids Due	1 day	Tue 1/12/27	Tue 1/12/27	23																																							
25	Recommendation of Award to City	5 days	Wed 1/13/27	Tue 1/19/27	24																																							
26	City Commision Approval	10 days	Wed 1/20/27	Tue 2/2/27	25																																							
27	Funding Agency Approval to Award	10 days	Wed 2/3/27	Tue 2/16/27	26																																							
28	Issue NOA - Contract Document Execution	15 days	Wed 2/17/27	Tue 3/9/27	27																																							
29	Pre-Construction Meeting/Notice To Proceed	1 day	Wed 3/24/27	Wed 3/24/27	28FS+10 days																																							
30	Construction Submittals - Initial Submission	40 days	Thu 3/25/27	Wed 5/19/27	29																																							
31	Construction Submittal - Review & Approval	10 days	Thu 5/20/27	Wed 6/2/27	30																																							
32	Clarifier Equipment - Fab & Delivery	100 days	Thu 6/3/27	Wed 10/20/27	31																																							
33	Bar Screen Equipment - Fab & Delivery	140 days	Thu 6/3/27	Wed 12/15/27	31																																							
34	Facility Construction Period	116 days	Thu 10/21/27	Thu 3/30/28																																								
35	Clarifier No. 1	30 days	Thu 10/21/27	Wed 12/1/27	32																																							
36	Isolate & Empty Clarifier No. 2	5 days	Thu 12/2/27	Wed 12/8/27	35																																							
37	Clarifier No. 2	30 days	Thu 12/9/27	Wed 1/19/28	36																																							
38	Bar Screen & Headworks	20 days	Thu 1/20/28	Wed 2/16/28	37																																							
39	Substantial Completion	1 day	Thu 2/17/28	Thu 2/17/28	38,35,37																																							
40	Final Completion	10 days	Fri 2/18/28	Thu 3/2/28	39																																							
41	Project Closeout - O&M Submittal and Record Drawings	20 days	Fri 3/3/28	Thu 3/30/28	40																																							

City of Truth or Consequences Wastewater Treatment Plant Headworks & Clarifier Improvements	Task		Project Summary		Inactive Task		Duration-only		Finish-only	
	Split		External Tasks		Inactive Milestone		Manual Summary Rollup		Progress	
	Milestone		External Milestone		Inactive Summary		Manual Summary		Deadline	
	Summary		Inactive Task		Manual Task		Start-only			

Attachment C

Docket Number:

CWA-06-2026-1771



MICHELLE LUJAN GRISHAM
GOVERNOR

JAMES C. KENNEY
CABINET SECRETARY

Original via Electronic Mail

March 27, 2028

Gary Whitehead, City Manager
City of Truth or Consequences
505 Sims Street,
Truth or Consequences, NM 87901
gwhitehead@torcnm.gov

Re: **City of Truth or Consequences Wastewater Treatment Plant, Major, Individual Permit; SIC /
NAICS 4952/221320; NPDES Compliance Evaluation Inspection; NPDES permit no. NM0020681;
January 29, 2026.**

Dear Gary Whitehead:

Enclosed please find a copy of the report for the referenced inspection that the New Mexico Environment Department ("NMED") conducted at your facility on behalf of the U.S. Environmental Protection Agency ("USEPA"). This inspection report will be sent to the USEPA Region 6 Office in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System ("NPDES") permitting program in accordance with requirements of the federal Clean Water Act.

The inspection report includes an introduction, observations, records review, areas of concern, closing conference and follow-up.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify both the USEPA and NMED in writing regarding modifications and compliance schedules at the addresses below:

Rachel Matthews
New Mexico NPDES Enforcement Coordinator
U.S. Environmental Protection Agency
Region 6 Water Enforcement Branch (6ECDWM)
1201 Elm Street, Suite 500
Dallas, Texas 75202
Matthews.Rachel@epa.gov
214-665-8589

Susan LucasKamat
Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502
Susan.LucasKamat@env.nm.gov
505-946-8924

If you have any questions about this inspection report, please contact Nafis Fuad at 505-531-7956 or at nafis.fuad@env.nm.gov.

Sincerely,

SCIENCE | INNOVATION | COLLABORATION | COMPLIANCE

Susan LucasKamat

 Digitally signed by Susan LucasKamat
Date: 2026.03.27 17:54:16 -06'00'

Susan A. LucasKamat
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau
PSRS.Program.Manager@env.nm.gov

cc: Roberto Bernier, USEPA (6ECDWM) via email Bernier.Roberto@epa.gov
Rachel Mathews, USEPA (6ECDWM) via email Matthews.Rachel@epa.gov
Amy Andrews, P.E., USEPA (6ECDWM) via email Andrews.Amy@epa.gov
David Esparza, P.E., USEPA (6ECDWM) via email Esparza.David@epa.gov
Tung Nguyen, USEPA (6WDPE) via email Nguyen.Tung@epa.gov
Silvia Zavala, USEPA (6WDPN) via email zavala.silvia@epa.gov
Susan A. Lucas Kamat, NMED SWQB Point Source Manager, via email
Susan.LucasKamat@env.nm.gov
Nafis Fuad, NMED SWQB Inspection Team Supervisor, via email Nafis.Fuad@env.nm.gov
Shawnee Suazo, NMED SWQB Complex Facility Inspector, via email
Shawnee.Suazo@env.nm.gov
Luke Zhong, NMED SWQB Municipal and Industrial Inspector, via email Luke.Zhong@env.nm.gov
Jason Martinez, NMED SWQB Permit Team Supervisor, via email Jason.Martinez2@env.nm.gov
Michael Kesler, NMED EHB District III Manager, via email Michael.Kesler@env.nm.gov
Jamie Foreman, City of TorC, via email jforeman@torcnm.gov
Keegan McCraw, City of TorC, via email kmccraw@torcnm.gov
Jesse Cole, City of TorC contractor, via email jezzys@yahoo.com
Patrick Loveall, City of TorC, via email ploveall@torcnm.gov



New Mexico Environment Department - Surface Water Quality Bureau INSPECTION REPORT

Inspection Date(s):	01/29/2026			
Media Program:	Water			
Regulatory Program(s)	CWA - NPDES			
Company Name:	City of Truth or Consequences			
Facility Name:	City of Truth or Consequences Wastewater Treatment Plant (WWTP)			
Facility Physical Location:	1595 Animal Shelter Road			
(city, state, zip code)	Truth or Consequences, NM 87901			
Mailing address:	505 Sims Street			
(city, state, zip code)	Truth or Consequences, NM 87901			
County/Parish:	Sierra County			
Facility Phone Number	575-740-4342			
Facility Contact:	Jamie Foreman		Interim Water Supervisor	
	jforeman@torcnm.gov			
FRS Number:	110013987034			
Identification/Permit Number:	NM0020681			
Media Identifier Number:	N/A			
NAICS:	221320			
SIC:	4952			
Personnel participating in inspection:				
Name	Affiliation	Title	Opening conf.	Closing conf.
Keegan McCraw	City of Truth or Consequences	Administrative Assistant	X	
Luke Zhong	NMED-SWQB	Municipal and Industrial Inspector	X	
Shawnee Suazo	NMED-SWQB	Inspector	X	
Patrick Loveall	City of Truth or Consequences	Water / Wastewater Operator	X	
Gary Whitehead	City of Truth or Consequences	City Manager	X	
Jamie Foreman	City of Truth or Consequences	Interim Water Supervisor		(Remote)
Nafis Fuad	NMED-SWQB	Compliance and Enforcement Supervisor	X	X
NMED Lead Inspector Signature/Date	Nafis Fuad Digitally signed by Nafis Fuad Date: 2026.03.27 14:56:05 -06'00'			
	Nafis Fuad		Date:	
Supervisor Signature/Date	Susan LucasKamat Digitally signed by Susan LucasKamat Date: 2026.03.27 17:42:34 -06'00'			
	Susan Lucas Kamat		Date:	

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Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

NMED inspectors Nafis Fuad, Shawnee Suazo, and Luke Zhong arrived at the City of Truth or Consequences Wastewater Treatment Plant (WWTP) (the “Site” or “Facility”) at 12:00 PM on January 29, 2026, for an unannounced inspection. We met Keegan McCraw, Administrative Assistant, to conduct the opening conference. I, Nafis Fuad, presented my credentials to Keegan McCraw and informed him that this was an NMED-led inspection to determine compliance with the facility’s National Pollutant Discharge Elimination System (NPDES) permit, NM0020681, and the Clean Water Act (CWA). The scope of the inspection is a Compliance Evaluation Inspection (CEI) and includes evaluation of the compliance of the facility with its NPDES permit.

FACILITY DESCRIPTION

The facility is located at 1595 Animal Shelter Road, Truth or Consequences, NM 87901. See aerial photo below.

The design flow of this facility is 1.06 million gallons per day (MGD) and is a major publicly owned treatment works (POTW) discharger. The facility has total of five (5) lift stations within its sewer collection system, two (2) of which are owned by the Village of Williamsburg.

Under their NPDES permit the facility is authorized to discharge treated effluent to Rio Grande in Segment 20.6.4.103 New Mexico Administrative Code (NMAC) of the Middle Rio Grande Basin.

Preliminary treatment at the headworks includes a barscreen and a cone shaped grit separator. From the headworks the wastewater flows to an aeration basin/oxidation ditch. From the oxidation ditch wastewater flows into two clarifiers. Supernatant from clarifiers flow to ultraviolet (UV) chamber with two (2) channels. Disinfected effluent flows through a Parshall flume where the flow is measured and compliance monitoring samples are collected before discharging through the outfall.

Solids separated at the headworks are sent to drying beds and then to Corralitos Regional Landfill. Solids from the aeration basin and clarifiers are designed to be sent to a digester and then to a belt press and composted thereafter.

Onsite In-house analysis is completed for the following:

- Dissolved Oxygen (DO), effluent (daily),
- pH, effluent (daily),
- Total Residual Chlorine (TRC), effluent (daily),
- E. coli bacteria, effluent (weekly).

Eurofins Environmental testing, Albuquerque, NM completes the following weekly analysis:

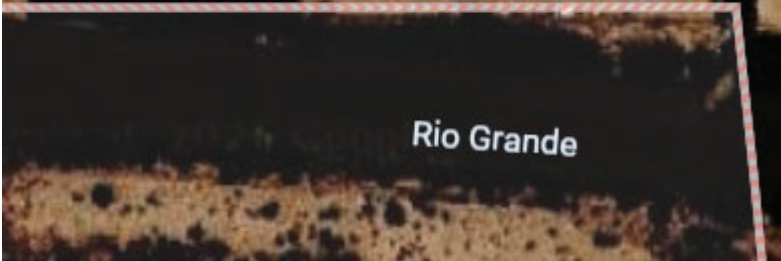
- 5-day Biochemical Oxygen Demand (BOD₅) (Influent & effluent),
- Total Suspended Solids (TSS) (Influent & effluent),
- Hexachlorobenzene (Effluent) Note: the sampling frequency and the final limit will change effective April 1, 2026.
- Acrylonitrile (Effluent),

Eurofins Environmental testing, Albuquerque, NM completes the following 3/week analysis:

- Total Cadmium (Effluent)

Cove Environmental, Stillwater, OK completes the following quarterly analysis:

- Whole Effluent Toxicity (WET) tests

Aerial photo City of Truth or Consequences – WWTP Accessed from google maps on 2026-02-12	
Latitude: 33.11493, Longitude: -107.28154	

Section II – OBSERVATIONS

After entry I observed that the overall condition of the facility grounds appeared to be clean with good housekeeping.

I interviewed Patrick Loveall, water & wastewater operator. The facility serves a population of approximately 3500 within the City of Truth or Consequences and the Village of Williamsburg. An unknown number of the population is served by septic systems. The facility does not receive hauled waste. The facility serves no Significant Industrial Users (SIUs) and no Categorical Industrial Users (CIUs). The facility serves more than thirty-five (35) non-significant, non-categorical industrial users, including one (1) Hospital, one (1) nursing home, approximately twenty-five to thirty-five (35) restaurants, and one (1) brewery. The daily average flow of this facility is 0.67-0.70 MGD. The facility does not experience any seasonal effects other than a slight change in the summer. The facility experiences negligible inflow and infiltration (I&I). Administrative assistant, Keegan McCraw, informed me that the facility is in the process of acquiring access to an asset management system. Patrick Loveall informed me that the facility has a diesel generator for backup power, however, the generator has been experiencing issues and has been out of operation for over a year. Patrick Loveall also informed me that the previous water supervisor had started the process of repairing the facility generator, however, there has been no progress since the departure of the previous water supervisor. Patrick Loveall informed me that the facility is installing a new bar screen and renovation of one vacuum station.

Patrick Loveall informed me that the staffing level for the facility is currently at five (5) full-time staff. The facility also has one (1) supporting staff member. Supporting staff members are not trained in compliance sampling and do not conduct sampling operations. Working hours are set from Monday through Friday, 7:00 AM to 3:30 PM. Two full-time staff and one supporting staff maintain and collect compliance samples at the wastewater treatment facility along with the city's water treatment facility.

As supporting information, I inquired about other non-NPDES regulations that apply to the facility. Patrick Loveall informed me that the minimum staffing level determined by NMED - Utility Operator Certification Program (UOCP) to be one (1) level 3 wastewater operator. Please note that the operator certification and certified operator requirements are administered by NMED-UOCP and is not a part of the NPDES program or CWA. None of the full-time workers meet the NMED-UOCP requirements of level 3 wastewater operator. Hence, the facility has contracted Jesse Cole, wastewater level 4 operator, as the contract operator to meet the NMED-UOCP minimum operator requirements. Patrick Loveall informed me that the facility is also regulated under a ground water discharge permit (DP-1162). Ground water discharge permits are issued by the New Mexico Environment Department (NMED) Groundwater Quality Bureau (GWQB).

COLLECTION SYSTEM

The City of Truth or Consequences and the Village of Williamsburg own their respective portions of the collection system. However, the entire collection system is maintained by the City of Truth or Consequences. A team member from the city checks all five (5) lift stations daily. The three (3) lift stations owned by the City of Truth or Consequences have onsite audible and visual alarms and are connected to the facility's Supervisory Control and Data Acquisition (SCADA) system. Water/wastewater operator Patrick Loveall, interim water supervisor Jamie Foreman, facility staff Conrad, and water foreman Tony, receive notifications regarding the lift stations from the SCADA. Sanitary Sewer Overflows (SSOs) are mitigated by the City of Truth or Consequences. Patrick Loveall informed me that there was a recent SSO due to issues at the lift station located at Central Avenue, which was within the Village of Williamsburg. Patrick Loveall informed me that the Village is working on upgrading both the lift stations in portion of their collection system. Patrick Loveall informed me that there is no written standard operating procedure for reporting and mitigating SSOs, the responding crew reports the SSOs to the Interim Water Supervisor. The facility does not report SSOs per NPDES permit requirement. Patrick Loveall informed me that two (2) of the three (3) lift stations owned by the city have onsite generators and the city has portable generators as well.

The facility has recently added approximately 20-30 houses to its service. However, the houses were not occupied as of the time of the onsite inspection on 01/29/2026.

HEADWORKS

I observed the bar screen at the headworks was non-operational (Photo #1). City manager, Gary Whitehead, informed us that the city is in the process of replacing the bar screen within the next 18-months. Patrick Loveall informed me that the facility manually scrapes the bar screen once a day in the morning. The wet well following the bar screen appeared to have excessive amounts of fat, oil, and grease (FOG) (Photo #2). I smelled a noxious odor in wet well. The headworks has level alarm. I observed what appeared to be inadequate pumping of influent during the inspection. Patrick Loveall informed me that the influent flow transducer is not working. The headworks is operating at a high flow, using the float (Photo #2), rendering the flow to the grit chamber from the wet well inconstant. Patrick Loveall informed me that while the flow passes through the grit separator (Photo #3), it has been non-operational for approximately 8 years. I observed the headworks operating at high flow, the overflow channel (Photo #4) from the grit separator was being used.

TREATMENT SYSTEM

I observed that decommissioned clarifiers were partially filled with fill material (Photo #5). Patrick Loveall informed me that the facility is in the process of breaching the bottoms of the decommissioned clarifiers and will fill them up afterwards. Patrick Loveall also informed me that the facility had fencing around the decommissioned clarifiers in order to prevent hazard falling, which however, were blown away by recent strong winds (Photo #5).

Patrick Loveall informed me that one of the aerators in the oxidation ditch was deliberately not being operated at the time of the inspection to create an anoxic zone in the basin for denitrification and another aerator was out of operation for between 1 - 2 years. Refer to follow-up section of this report for the status of the operator. I observed the remaining aerators were operational (Photo #8). I observed mixed liquor in oxidation ditch appeared to be of chocolate color. I did not observe any dark foam nor smelled any bad odor at the oxidation ditch.

I observed there was vegetation growth in the oxidation ditch (Photos #8, #9, & #10). I observed solids accumulation at the south-west corner of the oxidation ditch (Photos #9 & #10). Patrick Loveall informed me this is due to the inability to use foam/scum/sludge drying beds (Photos #11). The existing pipework blocks the flow (Photos #10), which is the facility has tried to remove but in vain. The reason for this is to the pipe is structurally embedded into the basin concrete.

I observed one of the channels from the flow splitter was closed (Photo #6). Patrick Loveall informed me that the reason the north clarifier (#1) was non-operational at the time of the inspection was due to a recirculation pump failure (Photo #12). I observed that both the secondary clarifiers appeared to have uneven weir crest (Photos #12 & #13) and overflow over the crest appeared to be uneven (Photos #13). I observed biomass formation on the crest and the channel. Patrick Loveall informed me that previously, the clarifiers have experienced settleability issues during the winter months.

DISINFECTION SYSTEM

Patrick Loveall informed me that the facility alternates between the two UV channels (Photo #14). I observed the UV control panels indicating three (3) out of four (4) sets of 2-lamp sets were on (Photo #15). The control panel does not have any alarm; there are flashing lights that indicate issues with the UV system. Patrick Loveall informed me that the facility cleans the sleeves and has inventory of spare bulbs. The effluent from the UV chamber appeared to have low turbidity (Photo #16). The facility has a V-notch weir installed (Photo #16) at the channel carrying the UV treated wastewater to the primary flow measuring device, the effluent Parshall Flume. Patrick Loveall informed me that the weir was installed to mitigate turbulent flow at the Parshall Flume.

The facility does not use chlorine for disinfection.

FLOW MEASUREMENT

I saw improper placement of flow measurement device. I observed that the throat section of the primary flow measuring device has a staff gauge that is not legible (Photo # 17) and the converging section of the flume has a second staff gauge that is in use (Photo # 18). I observed that the flow is turbulent at the Parshall flume, including in the converging section, where the facility has both the staff gauge for the flume and the secondary flow measuring device, in this case an ultrasonic flow meter, installed (Photo # 18). I confirmed totalizing flow meter is calibrated (Photo # 19). I did not see any buildup of solids in flume. I saw the flume had no cracks. The facility uses an autosampler next to the flume to collect composite samples (Photo # 20).

OUTFALL

I observed no suspended solids, turbidity, foam, grease, scum, color, or other macroscopic particulate matter in the effluent (Photo # 21). I did not see any potential toxicity (dead fish, dead plants) in the receiving waterway. I did not see any evidence of Eutrophication.

SOLIDS HANDLING

Patrick Loveall informed me that the facility removes waste activated sludge one or two times per week. During the inspection the belt press was not operational. Jamie Foreman informed me that the facility composts solids from their digester and belt press. The facility gives the compost away after it is cleared, other city entities land apply the compost. When in operations, the extracted liquids from solid processing are recirculated to the headworks.

LABORATORY

I observed that the laboratory appeared to be safe and clean. I observed that the pH probe in the laboratory is stored improperly in an open Erlenmeyer Flask in storage solution which caused the crystallization of the storage solution due to exposure to the atmosphere (Photo #23). The laboratory had adequate equipment, and appeared to be properly maintained, to perform in-house analyses. I verified the expiry dates for reagents and calibration solutions were not tracked properly. The pH buffers had received dates and opened dates written on the bottles, however, the facility does not track the true expiry date after opening and uses the manufacturer expiry date (Photo #24). I verified the sample storage temperatures and holding times to be adequate. I observed the laboratory keeps adequate calibration and maintenance records. However, the desiccator in the laboratory is not calibrated to measure humidity (Photo #22). I observed that the desiccator solids are not replaced, Patrick Loveall informed me that the facility does not replace the desiccator solids, nor does it calibrate the desiccator. I also observed that the equipment used to generate dilution water is not serviced or tested for quality of the water generated (Photo #25). I confirmed that personnel handling samples and performing analyses have adequate training. The laboratory currently does not have backup power due to malfunctioning facility backup generator. The laboratory has adequate inventory of supplies.

RECORDS REVIEW

I reviewed facility records for July and August of 2024, and October, November and December of 2025. Records appeared to be not maintained as required by permit. The facility benchsheet records values without units. Analyses are not performed per permit requirements. Analytical results were not consistent with data reported on discharge monitoring reports (DMRs).

On August 19, 2024, and August 21, 2024, the facility's collected effluent samples were analyzed by Eurofins Albuquerque with EPA method 200.8 for cadmium. The laboratory reports reported values for total recoverable cadmium as 0.0016 mg/L (1.6 µg/L) and 0.00071 mg/L (0.71 µg/L) respectively. However, the facility recorded these as 0.0016 µg/L and 0.00071 µg/L respectively, in their DMR worksheet (Microsoft Excel spreadsheet) (appendix 5) to perform statistics on the data and reported the same on their discharge monitoring record (DMR). Note that the reported values are 1000 times smaller than the actual values measured. I observed similar issues with Total Residual Chlorine (TRC) reporting. The facility uses a HACH pocket Colorimeter II™ which measures TRC in the unit of mg/L with two decimal places. However, the value that is being tracked in the facility daily log sheet, for example for August 18, 2024 (appendix 5) is recording an unitless value with two decimal places 0.24. Consequently, this value is being entered as a unitless value with two decimal places of 0.24 on the DMR worksheet (appendix 5). However, the facility's August 2024 DMR submission (appendix 5) shows that they have reported that value with two decimal places (0.24) of TRC in mg/L as the instantaneous max for the month of August 2024 while the unit for the field to enter TRC is µg/L. Note: this correct value of TRC measured in the effluent is 21 times more than the effluent limitation of 11.0 µg/L. Sampling and analysis data were not adequate. Data was missing the following information: times of sampling, analytical methods and techniques, units for results of analyses, times of analyses (appendix 5). The facility records initials of the individual performing sampling and analysis. However, it does not identify person overwriting values on the benchsheet (appendix 5).

I observed that the facility permit requires the Whole Effluent Toxicity (WET) testing to be conducted with an effluent dilution series (%) of 24%, 32%, 43%, 57%, and 76% (appendix 4). However, the laboratory report dated November 18-25, 2025, reported a dilution series (%) of 16%, 21%, 29%, 38%, and 51%. These tests do not constitute valid tests required by the permit conditions (appendix 5). The

facility also reports these incorrect values in their DMR (appendix 3). I also observed that the facility did not report WET testing results due on 6/30/25 and 12/31/25 (appendix 3).

I observed that the sample for analysis for Acrylonitrile on sample taken on 10/01/2025 was prepared beyond the specified holding time. The laboratory identified the results not meeting regulatory requirements (appendix 5).

The facility does not submit reports to the USEPA and NMED on required report per permit schedule of compliance, Sanitary Sewer Overflows (SSOs), and daily maximum limitation exceedances within 24 hours, as required by the permit (appendix 4).

On May 13, 2025, USEPA issued an Administrative Order (AO) ordering the facility, among other tasks, to submit plans for repair/rehabilitation of their, clarifier weirs and headworks. City manager Gary Whitehead informed me that the facility is on track to get a contract signed to rehabilitate the headworks within 18 months. On February 2, 2026, the USEPA deemed the information provided by the facility to be satisfactory and closed out the AO.

Section III – AREAS OF CONCERN (AOC)

The following areas of concern were identified in this inspection:

1. The facility lacked proper operation and maintenance including that of the headworks, Williamsburg lift stations, grit chamber, oxidation ditch, and clarifier.
 - a. Note: the USEPA issued Administrative Order (AO) to repair/rehabilitate clarifier, and headworks has been closed out as of February 2, 2026.
2. The facility has not submitted any reports required by permit schedule of compliance,
3. The facility does not report Sanitary Sewer Overflows (SSOs) per the permit requirement,
4. The facility does not have adequate backup power generation,
5. The facility has numerous exceedances of effluent limitations from January 12, 2023, through January 28, 2026,
6. The facility does not report daily maximum limitation exceedances within 24-hours as required by the permit,
7. The facility does not appropriately and accurately report discharge monitoring reports (DMRs) (appendix 5),
8. The facility does not conduct or report Whole Effluent Toxicity (WET) tests as required by the permit (appendix 3, 4, & 5),
9. The flow is turbulent at both the primary and the secondary flow measuring devices,
10. The facility does not calibrate the desiccator humidity gauge used in the laboratory, nor does it use desiccator solids,
11. The facility does not record values properly on daily benchsheet with the following missing information: times of sampling, analytical methods and techniques, units for results of analyses, times of analyses, identification of person overwriting values,
12. The facility does not properly store the pH electrode in the laboratory,
13. The facility does not track the true expiry date of pH buffers after opening,
14. The facility does not service or test the laboratory dilution water generation equipment.
15. Analysis for Acrylonitrile did not meet regulatory requirements.

CLOSING CONFERENCE:

NMED inspector Nafis Fuad conducted a remote closing conference via Microsoft Teams with the facility's interim water supervisor, Jamie Foreman at 1:30 PM on February 10, 2026, for the inspection. During the closing conference, I reviewed the #1 - #8 Areas of Concern noted during the inspection. Additionally, I noted the additional AOCs #9 - #15 after records review which were not included in the closing conference.

Section IV – FOLLOW UP

I received the following information on 2/23/2026, 3/4/2026, 3/11/2026, after exiting the Facility on 1/29/2026:

1. Schematic of treatment process
2. Submitted and signed DMR copy of submission/record for July & August 2024, October, November, December 2025; and:
 - a) Laboratory Bench Sheets (handwritten &/or typed) used to construct DMRs listed above.
 - b) Laboratory Analysis Reports used to construct DMRs listed above along with Chain of Custody records
 - c) Microsoft Excel spreadsheets used to construct DMRs listed above.
 - e) Calculation sheets used to calculate volumes for composite samples.
3. WET Testing Laboratory reports for Q2 (due June), Q3 (due September), and Q4 (due December) of 2025.
4. Flow meter logs for October, November, December 2025.
5. Latest Calibration sheets for influent and effluent primary and secondary flow meters.
6. Latest Calibration sheets for laboratory equipment (scales, thermometers, incubators, etc.).
7. A list of Overflow and/or Bypass Summary (if relevant) from January 1, 2024, to present.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log

Appendix 2 – Opening and closing conference sign-in sheets

Appendix 3 – Reporting errors and effluent limit exceedances in DMR from January 12, 2023, through January 28, 2026

Appendix 4 – Permit No. NM0020681 effective 04/01/2022, Part I pages 1, 2, 3, & 4; Part II pages 2 & 4

Appendix 5 – Example of excerpts/scans of laboratory analysis reports/bench sheets

Appendix 1

Photograph Log



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 1

Location	City of Truth or Consequences - WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1334	Date: 1/29/26
		
Barscreen at the headworks. Automatic feature non-operational, cleaned manually. Refer to AOC #1.		



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 2

Location	City of Truth or Consequences - WWTP		
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico	
Photographer: Nafis Fuad	Image File: IMG_1337	Date: 1/29/26	



Headworks wet well with excessive fat-oil-grease (FOG). Pump was operating at high level using the float. Refer to AOC #1.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 3

Location	City of Truth or Consequences - WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1340	Date: 1/29/26



Grit chamber non-operational for approximately 8 years. Refer to AOC #1.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 4

Location	City of Truth or Consequences - WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1341	Date: 1/29/26



Grit chamber overflow being used at the time of inspection due to inconsistent high flow caused by malfunctioning flow transducer. Refer to AOC #1.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 5

Location	City of Truth or Consequences - WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1343	Date: 1/29/26



Decommissioned clarifier bottoms are being breached and clarifiers are being filled.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 6

Location	City of Truth or Consequences - WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1346	Date: 1/29/26



Flow splitter from aeration basin to clarifiers



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 7

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1347	Date: 1/29/26



Flow regulators for the two clarifiers.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 8

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1349	Date: 1/29/26



Operating aerators in oxidation ditch. Vegetative growth in the oxidation ditch was observed. Refer to AOC #1.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 9

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1350	Date: 1/29/26



Vegetative growth in the oxidation ditch was observed. Refer to AOC #1.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 10

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1352	Date: 1/29/26



Vegetative growth in the oxidation ditch was observed. Refer to AOC #1.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 11

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1355	Date: 1/29/26
		
Foam/scum/sludge drying beds that are currently not in use and will go under renovation.		



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 12

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1357	Date: 1/29/26
A large, circular concrete clarifier tank at a wastewater treatment plant. The tank is filled with dark water. A green metal weir crest and launder system is visible along the inner edge of the tank. The background shows a clear blue sky, some trees, and industrial structures.		
North clarifier (#1) not in operation during the inspection due to a recirculating pump failure. Weir crest and launder not level. Refer to AOC #1.		



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 13

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1359	Date: 1/29/26



South clarifier (#2) in operation during the inspection. Image shows algae growth at the weir crest and the launder. Refer to AOC #1.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 14

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1361	Date: 1/29/26



UV channels

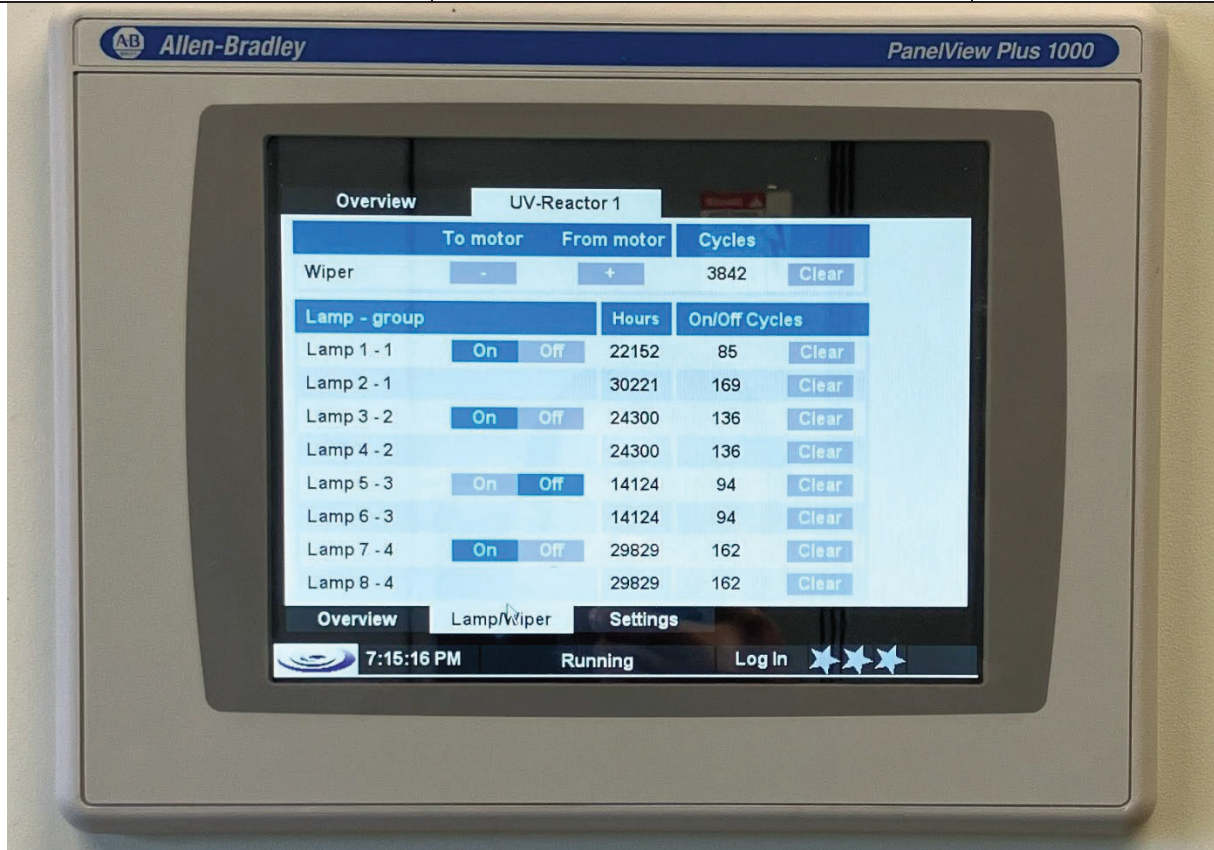
UV chambers housing UV channels.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 15

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1365 (cropped)	Date: 1/29/26



UV control panel showing lamps that are on.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 16

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1366	Date: 1/29/26



V-notch weir installed at the channel from UV chamber to the primary flow measuring device, Parshall flume. The weir is not used for flow measurement as it was installed as an upstream flow control to reduce turbulence at the flow measuring device.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 17

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1367	Date: 1/29/26



Primary flow measuring device, Parshall flume. Image shows turbulence at the converging and the throat section of the flume. Image shows that the staff gauge at the throat section is not legible.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 18

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1368	Date: 1/29/26



Converging section of Parshall flume where the facility has a legible staff gauge and an ultrasonic flow meter installed in order to measure the flow. Image shows turbulence at the converging section of the flume. Refer to AOC #9.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 19

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1370	Date: 1/29/26



Flow logger for the secondary flow measuring device, ultrasonic flow meter.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 20

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1371	Date: 1/29/26



Autosampler with a thermometer.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 21

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1373	Date: 1/29/26



Discharge from the outfall.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 22

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1326	Date: 1/29/26



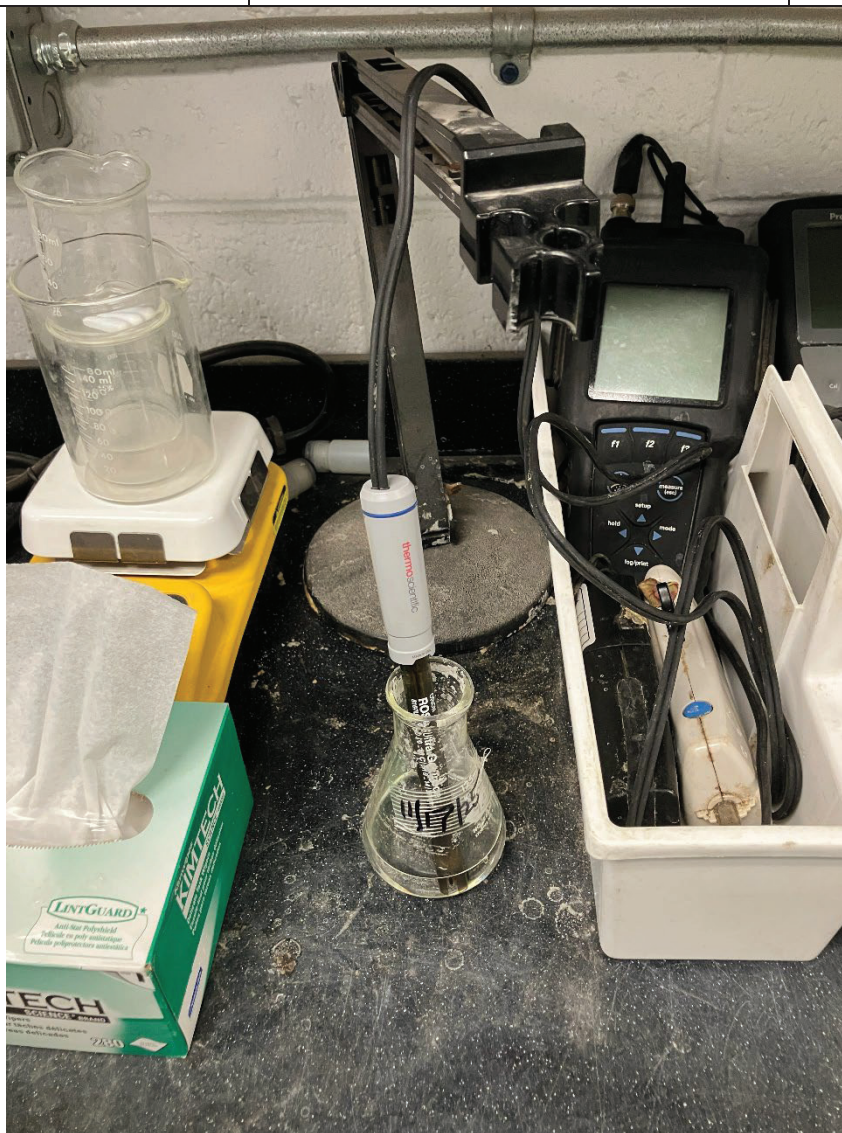
Desiccator in the laboratory, not calibrated. Refer to AOC#10.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 23

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1328	Date: 1/29/26



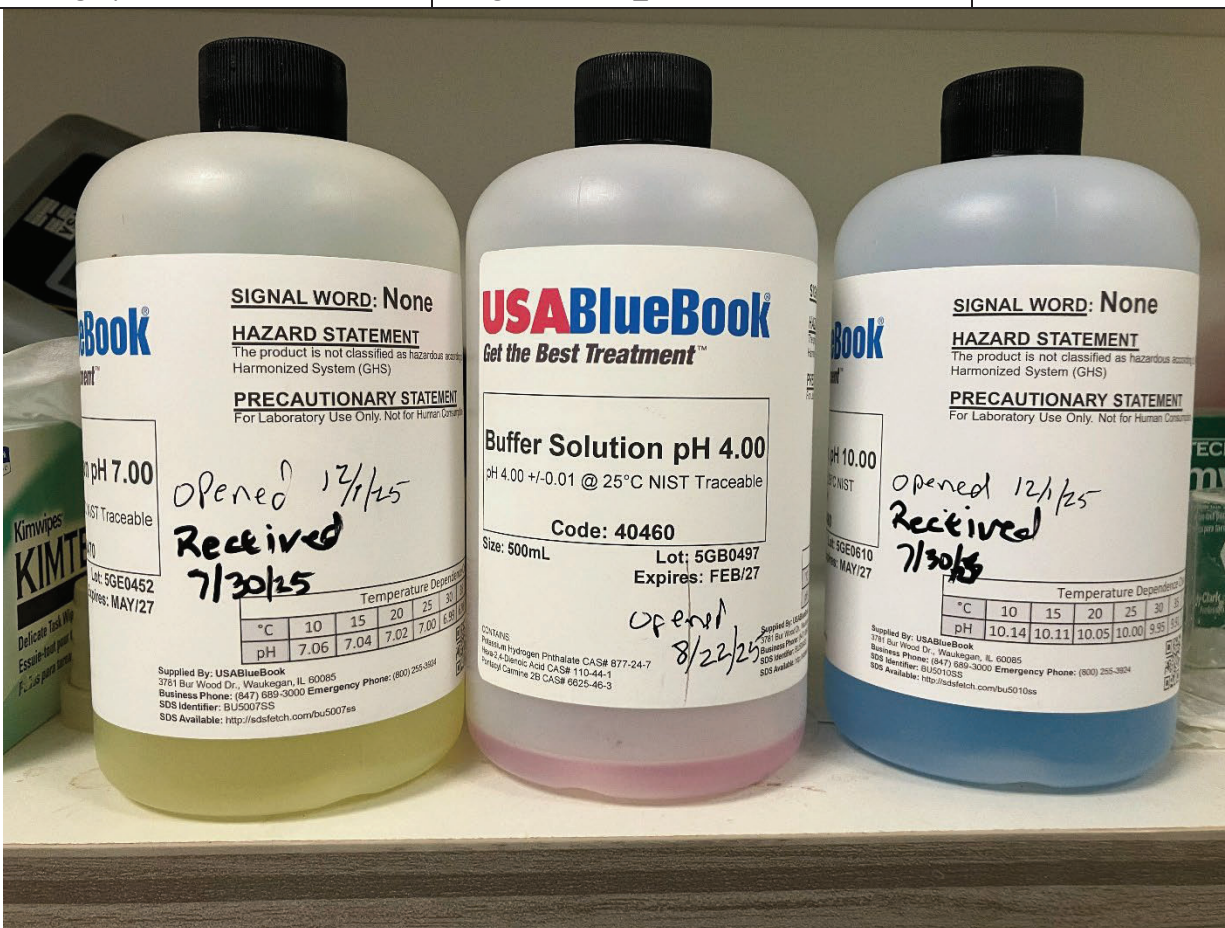
pH probe in the laboratory is stored in an open Erlenmeyer Flask in storage solution. Image shows crystallization of the storage solution due to exposure to the atmosphere. Refer to AOC#12.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 24

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1329	Date: 1/29/26



pH buffers in the laboratory. Image shows only received dates and opening dates are tracked. True expiry dates after opening are not tracked. Refer to AOC#13.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 25

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1331	Date: 1/29/26



Dilution water generation equipment in the laboratory. The facility does not service or test the equipment. Refer to AOC#14.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 26

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Jamie Foreman	Image File: 20260311_094448	Date: 03/11/26



Total Residual Chlorine (TRC) meter used by the facility. Image shows the unit is mg/L. Refer to AOC#7.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 27

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Nafis Fuad	Image File: IMG_1363	Date: 1/29/26



Facility backup generator which is out of order for over a year from the time of inspection. Refer to AOC#4.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 28

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Jamie Foreman	Image File: image000001 (15)	Date: 3/11/26



The facility digester for solids from aeration basin and clarifiers.



New Mexico Environment Department - Surface Water Quality Bureau Photograph Log

Photo No. 29

Location	City of Truth or Consequences – WWTP	
City: Truth or Consequences	County/Parish: Sierra County	State: New Mexico
Photographer: Jamie Foreman	Image File: image000002 (7)	Date: 3/11/26



The facility belt-press, not operational during the inspection.

Appendix 2

Opening and closing conference sign-in sheets

New Mexico Environment Department
 Surface Water Quality Bureau - Point Source Regulation Section
 1190 S St Francis Dr., Santa Fe, NM - 87505



NPDES Inspection attendance sheet

FACILITY: City of Truth or Consequences
 ASSOCIATED PERMIT #: NM0020681
 LEAD INSPECTOR: Nafis Foad
 Date(s) of Inspection: 1/29/2026

ATTENDEES

Name	Affiliation	Title	Phone #	email	Opening conf.	Closing Conf.
Keegan McCraw	City of Tore	Admin. Assistant	575-874-7331	KMcCraw@ToreNM.gov	✓	
Luke Zhang	NMED	Municipal & Industrial Inspector	505-690-2863	luke.zhang@env.nm.gov	✓	
Shawnee	NMED	Trispector		shawnee_scarzo@env.nm.gov	✓	NF X
Patrick Lorenell	City of Tore	water/waste operator	575-740-6220	plorenell@ToreNM.gov		

Name	Affiliation	Title	Phone #	email	Opening conf.	Closing Conf.
Grady Whitehead	City	city manager	575-746-7649	grwhitehead@tcpsnm.org		
X	X	X	X	X	X	X
Closing	Conference	was held with	Interim Water Supervisor			
Jamie	Foreman,	remotely via	Microsoft Teams	on 2/10/2026		

N.F.
 Initials: 1/29/2026 Date:

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Appendix 3

Reporting errors and effluent limit exceedances in DMR from January 12, 2023, through January 28, 2026

Permit NM0020681

Permit Name	Issue Date	Effective Date	Expiration Date
TRUTH OR CONSEQUENCES, CITY OF	2/28/2022	4/1/2022	3/31/2027

Outfall 001A

00300 Oxygen, dissolved [DO] / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/2022	3/31/2027	Grab	Weekly

Limit	
Limit Unit Desc	Milligrams per Liter
Statistical Base	MINIMUM
Limit Value	6.
DMR Values	
1/31/23	3.97
2/28/23	5.63
3/31/23	5.55
4/30/23	5.28
5/31/23	5.21
6/30/23	4.92
7/31/23	3.57
8/31/23	4.78
9/30/23	5.09
10/31/23	4.3
11/30/23	5.78
12/31/23	5.8
1/31/24	6.68
2/29/24	6.68
3/31/24	5.47
4/30/24	5.84
5/31/24	4.88
6/30/24	6.1
7/31/24	4.81
8/31/24	5.93
9/30/24	5.2
10/31/24	5.53
11/30/24	6.22
12/31/24	6.02
1/31/25	6.21
2/28/25	6.21
3/31/25	5.8
4/30/25	6.13
5/31/25	5.44
6/30/25	4.77
7/31/25	5.08
8/31/25	4.38
9/30/25	4.43
10/31/25	5.18
11/30/25	5.66
12/31/25	6.05

00310 BOD, 5-day, 20 deg. C / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/2022	3/31/2027	6 Hour Composite	Weekly

Limit				
Limit Unit Desc	Pounds per Day	Pounds per Day	Milligrams per Liter	Milligrams per Liter
Statistical Base	30DA AVG	7 DA AVG	30DA AVG	7 DA AVG
Limit Value	176.	265.	20.	30.
DMR Values				
1/31/23	45.9	90.8	8.5	17
2/28/23	40.1	69.9	7	12
3/31/23	19.3	43.6	4.5	8
4/30/23	13.5	34.6	7	17
5/31/23	11.7	18.5	7.06	14.6
6/30/23	152	211	5	12.6
7/31/23	130.1	489.5	24.8	83.3
8/31/23	1.5	7.6	.6	3.2
9/30/23	52.52	20.72	0	10.02
10/31/23	40.9	70.4	8.5	11.3
11/30/23	16.4	45.4	6.2	11.4
12/31/23	10.9	26	2.3	4.7
1/31/24	8.7	22	2.3	4.7
2/29/24	4.2	12.7	1.3	2.4
3/31/24	5.1	12.9	4.3	11
4/30/24	15	18.5	10.2	15
5/31/24	19.7	30.2	9.8	16
6/30/24	13.7	22.9	5.3	12
7/31/24	37.39	72.1	12.24	17
8/31/24	13.95	22.23	3.88	6.9
9/30/24	44.611	19.244	6.5	3.875
10/31/24	15.72	28.04	4.72	8.8
11/30/24	16.038	28.296	2.95	5.2
12/31/24	5.572	17.288	.789	3.156
1/31/25	11.384	17.118	2.088	3.2
2/28/25	13.636	19.754	3	4.3
3/31/25	41.714	116.693	11.575	22
4/30/25	7.193	19.589	2.225	6.5
5/31/25	15.622	31.016	3.725	6.5
6/30/25	9.457	19.484	10.375	3.2
7/31/25	414.184	119.4	67	19.36
8/31/25	37.636	14.998	7.3	3.3
9/30/25	14.663	43.864	2.575	7.6
10/31/25	17.195	5.746	5	1.62
11/30/25	31.274	10.148	7.5	2.375
12/31/25	20.457	33.774	4.38	6.2

81010 BOD, 5-day, percent removal / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/2022	3/31/2027	Calculated	Monthly

Limit	
Limit Unit Desc	Percent
Statistical Base	MO AV MN
Limit Value	85.
DMR Values	
1/31/23	95.4
2/28/23	97.3
3/31/23	97.8
4/30/23	96.9
5/31/23	96
6/30/23	95.7
7/31/23	79.1
8/31/23	99.2
9/30/23	97
10/31/23	90.6
11/30/23	95
12/31/23	97.2
1/31/24	98.8
2/29/24	99.4
3/31/24	98
4/30/24	94.3
5/31/24	92.8
6/30/24	95
7/31/24	86.64
8/31/24	97.457
9/30/24	97.201
10/31/24	95.42
11/30/24	96.745
12/31/24	99.436
1/31/25	98.38
2/28/25	98.022
3/31/25	88.113
4/30/25	98.239
5/31/25	97.179
6/30/25	96.357
7/31/25	84.448
8/31/25	97.138
9/30/25	98.678
10/31/25	98.904
11/30/25	85.244
12/31/25	98.543

00400 pH / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/2022	3/31/2027	Grab	Daily

Limit		
Limit Unit Desc	Standard Units	Standard Units
Statistical Base	MINIMUM	MAXIMUM
Limit Value	6.6	9.
DMR Values		
1/31/23	6.65	7.23
2/28/23	6.7	7.04
3/31/23	6.67	7.25
4/30/23	6.82	8.01
5/31/23	6.93	7.47
6/30/23	7.04	7.35
7/31/23	7.12	7.36
8/31/23	7.11	7.37
9/30/23	7.29	7.43
10/31/23	6.87	7.32
11/30/23	7.01	7.88
12/31/23	7.12	7.6
1/31/24	7.17	7.53
2/29/24	6.79	7.54
3/31/24	7.28	7.78
4/30/24	7.29	7.95
5/31/24	7.2	7.85
6/30/24	7.23	7.9
7/31/24	5.43	7.82
8/31/24	7.01	7.73
9/30/24	6.6	7.53
10/31/24	6.79	7.48
11/30/24	6.63	7.55
12/31/24	6.6	7.58
1/31/25	6.85	7.21
2/28/25	6.82	7.23
3/31/25	7.03	7.49
4/30/25	6.99	7.34
5/31/25	7	7.47
6/30/25	7.05	7.58
7/31/25	5.62	7.8
8/31/25	6.82	7.8
9/30/25	6.74	7.7
10/31/25	6.89	7.6
11/30/25	6.72	7.58
12/31/25	6.93	7.56

01027 Cadmium, total [as Cd] / Location 1 / Season 0 / Base

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/2022	3/31/2027	Grab	Three per Week

Limit				
Limit Unit Desc	Pounds per Day	Pounds per Day	Micrograms per L	Micrograms per Lite
Statistical Base	30DA AVG	7 DA AVG	30DA AVG	DAILY MX
Limit Value	.01	.02	1.55	2.32
DMR Values				
1/31/23	0	0	0	.03
2/28/23	0	0	0	0
3/31/23	0	0	0	0
4/30/23	0	0	0	0
5/31/23	0	0	0	0
6/30/23	0	0	0	0
7/31/23	0	0	0	0
8/31/23	0	0	0	0
9/30/23	0	0	0	0
10/31/23	0	0	0	0
11/30/23	0	0	0	0
12/31/23	0	0	0	0
1/31/24	0	0	0	0
2/29/24	0	0	0	0
3/31/24	0	0	0	0
4/30/24	0	0	0	0
5/31/24	0	0	0	0
6/30/24	0	0	0	0
7/31/24	0	0	0	0
8/31/24	0	0	.0002	.0016
9/30/24	0	0	0	0
10/31/24	0	0	0	0
11/30/24	0	0	0	0
12/31/24	0	0	0	0
1/31/25	0	0	0	0
2/28/25	0	0	0	0
3/31/25	0	0	0	0
4/30/25	0	0	0	0
5/31/25	0	0	0	0
6/30/25	0	0	0	0
7/31/25	0	0	0	0
8/31/25	0	0	0	0
9/30/25	0	0	0	0
10/31/25	0	0	0	0
11/30/25	0	0	0	0
12/31/25	0	0	0	0

Values reported in incorrect units

TOP3B NOEC Lethal Static Renewal 7 Day Chronic Ceriodaphnia dubia / Location 1 / Se

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/2022	3/31/2027	24 Hour Composite	Quarterly

Limit	
Limit Unit Desc	Percent
Statistical Base	VALUE
Limit Value	
DMR Values	
3/31/23	51
6/30/23	51
9/30/23	51
12/31/23	51
3/31/24	51
6/30/24	51
9/30/24	51
12/31/24	51
3/31/25	51
6/30/25	Not Received
9/30/25	51
12/31/25	Not Received

TOP6C NOEC Lethal Static Renewal 7 Day Chronic Pimephales promelas / Location 1 / S

Limit Start Date	Limit End Date	Sample Type	Frequency of Analysis
4/1/2022	3/31/2027	24 Hour Composite	Quarterly

Limit	
Limit Unit Desc	Percent
Statistical Base	VALUE
Limit Value	
DMR Values	
3/31/23	51
6/30/23	51
9/30/23	51
12/31/23	51
3/31/24	51
6/30/24	51
9/30/24	51
12/31/24	51
3/31/25	51
6/30/25	Not Received
9/30/25	51
12/31/25	Not Received

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Appendix 4

Permit No. NM0020681 effective 04/01/2022,
Part I pages 1, 2, 3, & 4; Part II pages 2 & 4

PART I – REQUIREMENTS FOR NPDES PERMITS**A. LIMITATIONS AND MONITORING REQUIREMENTS****1. OUTFALL 001 - FINAL Effluent Limits – 1.06 MGD Design Flow**

During the period beginning the effective date of the permit and lasting through the expiration date of the permit (unless otherwise noted), the permittee is authorized to discharge treated domestic wastewater from Outfall 001 to Rio Grande River. Such discharges shall be limited and monitored by the permittee and reported as specified below:

POLLUTANT	DISCHARGE LIMITATIONS MINIMUM	DISCHARGE LIMITATIONS MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH	6.6 s.u.	9.0 s.u.	Daily	Instantaneous Grab (*3)
DO (*6)	6 mg/L	N/A	Weekly	Instantaneous Grab (*3)

POLLUTANT	30-DAY AVG, lbs/day, unless noted	7-DAY AVG lbs/day, unless noted	30-DAY AVG mg/l, unless noted (*1)	7-DAY AVG mg/l, unless noted (*1)	DAILY MAX mg/l, unless noted (*1)	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	Report MGD	Report MGD	N/A	N/A	N/A	Daily	Totalized meter
BOD ₅	176	265	20	30	N/A	Weekly	6-hr Composite
TSS	265	398	30	45	N/A	Weekly	6-hr Composite
BOD ₅ % removal, minimum	≥85 (*2)	N/A	N/A	N/A	N/A	Monthly	Calculation
TSS % removal, minimum	≥85 (*2)	N/A	N/A	N/A	N/A	Monthly	Calculation
TRC	N/A	N/A	N/A	N/A	11 ug/l (*4)	Daily	Instantaneous Grab (*3)
E. coli bacteria	NA	N/A	548 cfu (or MPN)/100 ml (*5)	N/A	2,507 cfu (or MPN)/100 ml	Weekly	Grab
Hexachlorobenzene, interim limit (*7, *8)	5.48E-02	N/A	6.2 ug/l	N/A	NA	Weekly	Grab
Hexachlorobenzene, final limit (*8, *9)	5.43E-05	8.15E-05 daily max	6.14E-03 ug/l	N/A	9.21E-03 ug/l	3/Week	Grab
Cadmium, Total	0.01	0.02	1.55 ug/L	N/A	2.32 ug/L	3/Week	Grab
Acrylonitrile	0.1	0.15	11.65 ug/L	N/A	17.48 ug/L	Weekly	Grab
Total Phosphorus	N/A	N/A	N/A	N/A	Report	Quarterly	6-hr Composite
Total Nitrogen	N/A	N/A	N/A	N/A	Report	Quarterly	6-hr Composite

WHOLE EFFLUENT TOXICITY TESTING 7-DAY CHRONIC NOEC FRESHWATER (*10)	VALUE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Ceriodaphnia dubia	Report	Quarterly	24-hr Composite
Pimephales promelas	Report	Quarterly	24-hr Composite

Footnotes:

*1 See **Appendix A of Part II** of the permit for minimum quantification limits.

*2 Percent removal is calculated using the following equation:

$$\text{Percent removal} = \frac{\text{average monthly influent concentration } \left(\frac{\text{mg}}{\text{L}}\right) - \text{average monthly effluent concentration } \left(\frac{\text{mg}}{\text{L}}\right)}{\text{average monthly influent concentration } \left(\frac{\text{mg}}{\text{L}}\right)} \times 100$$

*3 Analyzed within 15 minutes of collection.

*4 The effluent limitation for TRC is the instantaneous maximum and cannot be averaged for reporting purposes.

*5 The geometric mean of E. coli bacteria shall be used for reporting the 30-day average values.

*6 Field kit (probe) can be used to measure.

*7 Interim limitations are expired on first day of 4th year from the permit effective date.

*8 EPA Method 612 (or approved method under 40 CFR 136.3 with MDL A.M. of 0.05 ug/L or lower) shall be used for analysis.

*9 Limitations shall be effective beginning first day of 4th year from the permit effective date.

*10 Monitoring and reporting requirements begin on the effective date of this permit. See Part II of the permit for WET testing requirements for additional WET monitoring and reporting conditions. Grab samples are allowed per method, if needed.

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2. FLOATING SOLIDS, VISIBLE FOAM AND/OR OILS

There shall be no discharge of floating solids or visible foam in other than trace amounts. There shall be no discharge of visible films of oil, globules of oil, grease or solids in or on the water, or coatings on stream banks.

3. SAMPLE LOCATION

Samples taken in compliance with the monitoring requirements specified above shall be taken at the discharge from the final treatment unit prior to the receiving stream. The sample point shall be clearly marked by the facility if it is not at the final outfall location. There shall be no flow from any source into the piping system after the sample point and prior to the final outfall.

B. SCHEDULES OF COMPLIANCE

The permittee shall comply with the following schedule of activities for the attainment of state water quality standards-based final effluent limitations for hexachlorobenzene:

Activity	Months from permit effective date
1. Determine exceedance causes, if applicable	6
2. Develop control options, if needed, evaluate and select control mechanisms	12
3. Construction of selected control mechanisms, if any	24
4. Attain final effluent limitations	36 or less

The permittee shall submit quarterly progress reports to EPA and NMED in accordance with the following schedule. The permittee shall also include the following in its quarterly progress reports: design completion, construction start and construction completion if any. The requirement to submit quarterly progress reports shall expire after written final report has been submitted. No later than 14-days after the date compliance with the final limits have been met, the permittee shall submit a written final report both to EPA and NMED, stating that compliance has been completed. If at any time during the compliance periods the permittee determines that full compliance will not be met within the time allowed, a separate report shall be sent to EPA stating the explanation for this delay and proposed remedial actions.

PROGRESS REPORT DATES: January 30, April 30, July 30, October 30

The permittee should note that each date applies to the prior three month period.

Progress and final reports shall be sent to the agencies (EPA and NMED) mentioned in the Part I.C below.

C. MONITORING AND REPORTING (MAJOR DISCHARGERS)

Discharge Monitoring Report (DMR) results shall be electronically reported to EPA per 40 CFR 127.16. To submit electronically, access the NetDMR website at <https://netdmr.epa.gov>. Until approved for Net DMR, the permittee shall request temporary or emergency waivers from electronic reporting. To obtain

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the waiver, please contact: U.S. EPA - Region 6, Water Enforcement Branch, New Mexico State Coordinator (6EN-WC), (214) 665-7179. If paper reporting is granted temporarily, the permittee shall submit the original DMR signed and certified as required by Part III.D.11 and all other reports required by Part III.D. to the EPA and copies to NMED (under Part III.D.4 of the permit). Reports shall be submitted monthly.

1. Reporting periods shall end on the last day of the month.
2. The permittee is required to submit regular reports as described above postmarked no later than the 15th day of the month following each reporting period.
3. The annual sludge report required in part IV of the permit is due on February 19 of each year and covers the previous calendar year from January 1 through December 31.
4. NO DISCHARGE REPORTING: If there is no discharge at Outfall 001 during the sampling month, place an "X" in the NO DISCHARGE box located in the upper right corner of the Discharge Monitoring Report.
5. If any 7-day average or 30-day average value exceeds the effluent limitations specified in Part I.A, the permittee shall report the excursion in accordance with the requirements of Part III.D.
6. Any 7-day average or 30-day average value reported in the required Discharge Monitoring Report which is in excess of the effluent limitation specified in Part I.A shall constitute evidence of violation of such effluent limitation and of this permit.
7. Other measurements of oxygen demand (e.g., TOC and COD) may be substituted for the five days Biochemical Oxygen Demand (BOD₅), or for the five-day Carbonaceous Biochemical Oxygen Demand (CBOD₅), as applicable, where the permittee can demonstrate long term correlation of the method with BOD₅ or CBOD₅ values, as applicable. Details of the correlation procedures used must be submitted and prior approval granted by the permitting authority for this procedure to be acceptable. Data reported must also include evidence to show that the proper correlation continues to exist after approval.

D. OVERFLOW REPORTING

The permittee shall report all overflows with the Discharge Monitoring Report submittal. These reports shall be summarized and reported in tabular format. The summaries shall include: the date, time, duration, location, estimated volume, and cause of the overflow; observed environmental impacts from the overflow; actions taken to address the overflow; and ultimate discharge location if not contained (e.g., storm sewer system, ditch, tributary).

Overflows that endanger health or the environment shall be reported via email to EPA (Part III.D.7) within 24 hours, and to NMED Surface Water Quality Bureau at (505) 827-0187 within 24 hours from the time the permittee becomes aware of the circumstance. A written report of overflows that endanger health or the environment shall be provided to EPA, and the NMED Surface Water Quality Bureau within 5 days of the time the permittee becomes aware of the circumstance.

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B. 24-HOUR ORAL REPORTING: DAILY MAXIMUM LIMITATION VIOLATIONS

Under the provisions of Part III.D.7.b.(3) of this permit, violations of daily maximum limitations for the following pollutants shall be reported orally to EPA Region 6 (email accepted), Compliance and Assurance Division, Water Enforcement Branch (6EN-W), Dallas, Texas and concurrently to NMED within 24 hours from the time the permittee becomes aware of the violation followed by a written report in five days.

Hexachlorobenzene, Cadmium, Acrylonitrile and DO

C. PERMIT MODIFICATION AND REOPENER

In accordance with [40 CFR Part 122.44(d)], the permit may be reopened and modified during the life of the permit if relevant portions of New Mexico's Water Quality Standards for Interstate and Intrastate Streams are revised, or new State water quality standards are established and/or remanded by New Mexico Water Quality Control Commission, respectively.

In accordance with [40 CFR Part 122.62(s)(2)], the permit may be reopened and modified if new information is received that was not available at the time of permit issuance that would have justified the application of different permit conditions at the time of permit issuance. Permit modifications shall reflect the results of any of these actions and shall follow regulations listed at [40 CFR Part 124.5].

D. CONTRIBUTING INDUSTRIES AND PRETREATMENT REQUIREMENTS

1. The following pollutants may not be introduced into the treatment facility:
 - Pollutants which create a fire or explosion hazard in the publicly owned treatment works (POTW), including, but not limited to, wastestreams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.21;
 - Pollutants which will cause corrosive structural damage to the POTW, but in no case discharges with pH lower than 5.0, unless the works are specifically designed to accommodate such discharges;
 - Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW, resulting in Interference;
 - Any pollutant, including oxygen demanding pollutants (e.g., BOD), released in a discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW;
 - Heat in amounts which will inhibit biological activity in the POTW resulting in Interference but in no case heat in such quantities that the temperature at the POTW treatment plant exceeds 40 degrees Centigrade (104 degrees Fahrenheit) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits;
 - Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;
 - Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems; and

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E. WHOLE EFFLUENT TOXICITY TESTING (7-DAY CHRONIC NOEC FRESHWATER)

It is unlawful and a violation of this permit for a permittee or his designated agent, to manipulate test samples in any manner, to delay sample shipment, or to terminate or to cause to terminate a toxicity test. Once initiated, all toxicity tests must be completed unless specific authority has been granted by EPA Region 6 or the State NPDES permitting authority.

1. SCOPE AND METHODOLOGY

- a. The permittee shall test the effluent for toxicity in accordance with the provisions in this section.

APPLICABLE TO FINAL OUTFALL(S) 001	
REPORTED AS FINAL OUTFALL	001
CRITICAL DILUTION (%)	57%
EFFLUENT DILUTION SERIES (%)	24%, 32%, 43%, 57%, 76%.
TEST SPECIES AND METHODS	Ceriodaphnia dubia / Method 1002.0 (EPA-821-R-02-013 or latest version)
	Pimephales promelas / Method 1000.0 (EPA/821/R-02-013 or latest version)
SAMPLE TYPE	Defined in PART I

- b. The NOEC (No Observed Lethal Effect Concentration) is herein defined as the greatest effluent dilution at and below which lethality that is statistically different from the control (0% effluent) at the 95% confidence level does not occur. Chronic lethal test failure is defined as a demonstration of a statistically significant lethal effect at test completion to a test species at or below the critical dilution. Chronic sub-lethal test failure is defined as a demonstration of a statistically significant sub-lethal effect (i.e., growth or reproduction) at test completion to a test species at or below the critical dilution.
- c. This permit may be reopened to require WET limits, chemical specific effluent limits, additional testing, and/or other appropriate actions to address toxicity.

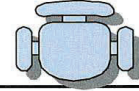
2. REQUIRED TEST ACCEPTABILITY CRITERIA AND TEST CONDITIONS

The permittee shall repeat a test, including the control and all effluent dilutions, if the procedures and quality assurance requirements defined in the test methods or in this permit are not satisfied, including the following additional criteria:

Condition/Criteria	<i>Ceriodaphnia dubia</i>	<i>Pimephales promelas</i>
Test Duration	Until 60% or more of surviving control females have 3 broods (max 8 days)	7 days
# of replicates per concentration	10	5

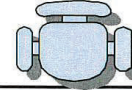
Appendix 5

Example of excerpts/scans of laboratory analysis reports/bench sheets



MONTH OF AUGUST, 2024

TRUTH OF CONSEQUENCES WASTEWATER SYSTEM EFFLUENT FLOWS								
DATE:	INITIALS	TOTALIZER	FLUME MGD	EFF.FLOW	DO	PH	TEMP	TRC
		74829		163675				
1	SM	73533	0.8	164116	5.20	7.67	29.10	0.00
2	PL	78933	0.8	164732	5.55	7.73	30.20	0.00
3	PL	67525	0.8	164732	5.60	7.54	28.90	0.00
4	TH	74458	0.8	165547	5.52	7.21	29.80	0.00
5	SM	75452	0.8	166043	5.41	7.48	29.60	0.00
6	SM	74695	0.8	166636	5.30	7.47	29.70	0.00
7	PL	78408	0.8	167276	5.48	7.42	30.20	0.00
8	PL	88347	0.8	167754	5.36	7.52	30.50	0.00
9	SM	74666	0.8	169178	2.50	7.31	28.90	0.00
10	SM	76446	0.8	168571	5.85	7.18	29.10	0.00
11	PL	81073	0.8	168571	5.46	7.30	37.10	0.00
12	PL	83143	0.8	168571	5.58	7.40	37.60	0.00
13	PL	78377	0.8	168875	5.28	7.36	37.80	0.00
14	PL	66571	0.8	169262	5.32	7.42	37.50	0.02
15	PL	91560	0.8	169262	5.48	7.53	37.80	0.02
16	SM	82782	0.8	169518	5.84	7.11	37.20	0.00
17	SM	76348	0.8	169827	5.80	7.33	36.90	0.00
18	PL	77003	0.8	169927	5.72	7.29	35.90	0.24
19	PL	78307	0.8	169927	5.50	7.38	35.80	0.08
20	PL	73728	0.8	169927	5.62	7.45	36.20	0.08
21	PL	80906	0.8	169927	5.37	7.24	37.40	0.00
22	PL	73819	0.8	170071	5.34	7.29	37.00	0.00
23	SM	74948	0.8	170498	5.37	7.26	35.50	0.00
24								
25	SM	71309	0.8	170851	5.33	7.37	34.70	0.00
26	SM	72741	0.8	171249	5.31	7.36	35.90	0.00
27	PL	76401	0.8	171249	5.38	7.42	34.70	0.00
28	PL	72027	0.8	171249	5.27	7.38	34.30	0.00
29	PL	73246	0.8	171249	5.45	7.42	35.30	0.00
30	PL	55926	0.8	171249	5.90	7.42	34.50	0.00
31	SM	70940	0.8	171249	5.93	7.01	34.40	0.00
			meter initial	meter final				
Armijo ball field MGD			82091000	82627000				
truck fill MGD			43914050	43934010				
golf course MGD			292907450	292907450				



MONTH OF AUGUST, 2024

TRUTH OF CONSEQUENCES WASTEWATER SYSTEM EFFLUENT FLOWS

DATE:	INITIALS	TOTALIZER	FLUME MGD	EFF.FLOW	DO	PH	TEMP	TRC
1	SM	73533	0.8	164116	5.20	7.67	29.1	0.00
2	PL	78933	0.8	164738	5.55	7.23	30.2	0.00
3	PL	67525	0.8	164732	5.60	7.54	28.9	0.00
4	PL	74458	0.8	165547	5.52	7.21	29.8	0.00
5	SM	75452	0.8	166043	5.41	7.48	29.6	0.00
6	SM	74695	0.8	166636	5.30	7.47	29.7	0.00
7	PL	78408	0.8	167270	5.48	7.42	30.2	0.00
8	PL	88347	0.8	167754	5.36	7.52	30.5	0.00
9	SM	74666	0.8	168178	5.50	7.31	28.9	0.0
10	SM	76446	0.8	168571	5.85	7.18	29.1	0.0
11	PL	81073	0.9	168571	5.46	7.30	32.1	0.00
12	PL	83143	0.8	168571	5.58	7.40	32.6	0.00
13	PL	78377	0.8	168875	5.28	7.36	32.8	0.00
14	PL	66571	0.8	169262	5.32	7.42	32.5	0.02
15	PL	91560	0.8	169262	5.48	7.53	32.8	0.02
16	SM	82582	0.8	169518	5.84	7.11	32.2	0.0
17	SM	76348	0.8	169825	5.80	7.33	36.9	0.0
18	PL	77003	0.8	169927	5.72	7.29	35.9	0.24
19	PL	78307	0.8	169927	5.50	7.38	35.8	0.08
20	PL	73728	0.8	169927	5.62	7.45	36.2	0.08
21	PL	80906	0.8	169927	5.31	7.24	32.4	0.00
22	PL	73819	0.8	170071	5.34	7.29	37.0	0.00
23	SM	74948	0.8	170498	5.37	7.26	35.5	0.0
24								
25	SM	71009	0.8	170851	5.33	7.35	34.5	0.0
26	SM	72541	0.8	171049	5.31	7.36	34.9	0.0
27	PL	76401	0.8	171249	5.38	7.42	34.7	0.00
28	PL	72027	0.8	171249	5.27	7.38	34.3	0.00
29	PL	73246	0.8	171249	5.45	7.42	35.3	0.00
30	PL	55926	0.8	171249	5.90	7.25	34.5	0.00
31	SM	70940	meter initial	meter final	5.93	7.01	34.4	0.04
Armijo ball field MGD								
truck fill MGD								
golf course MGD								

Client Sample Results

Client: City of Truth or Consequences
Project/Site: Weekly DMR NPDES

Job ID: 885-10290-1

Client Sample ID: #1

Lab Sample ID: 885-10290-1

Date Collected: 08/19/24 12:45

Matrix: Water

Date Received: 08/21/24 11:48

Method: EPA 200.8 - Metals (ICP/MS) - Total Recoverable									
Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac	
Cadmium	0.0016		0.00050	mg/L		08/22/24 13:52	08/28/24 13:21	1	

Eurofins Albuquerque

Client Sample Results

Client: City of Truth or Consequences
Project/Site: Weekly DMR NPDES

Job ID: 885-10401-1

Client Sample ID: #3

Date Collected: 08/21/24 13:30

Date Received: 08/22/24 11:00

Lab Sample ID: 885-10401-2

Matrix: Water

Method: EPA 200.8 - Metals (ICP/MS) - Total Recoverable

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Cadmium	0.00071		0.00050	mg/L		08/22/24 13:52	08/29/24 16:21	1

Eurofins Albuquerque

Client Sample Results

Client: City of Truth or Consequences
Project/Site: Weekly DMR NPDES

Job ID: 885-34621-1

Client Sample ID: #1

Date Collected: 10/01/25 13:47

Date Received: 10/02/25 11:05

Lab Sample ID: 885-34621-1

Matrix: Water

Method: EPA 624.1 - Volatile Organic Compounds (GC/MS)

Analyte	Result	Qualifier	RL	Unit	D	Prepared	Analyzed	Dil Fac
Acrylonitrile	ND	H	10	ug/L			10/07/25 22:57	1



Whole Effluent Toxicity (WET) Test Summary

Report ID: TRUT111825
 Study Date: November 18th – 25th, 2025

STUDY SUMMARY

Client/Facility Name: City of Truth or Consequences
Client Contact: Patrick Loveall
Client Phone: 575-894-7331
Facility Location: 1595 Animal Shelter Rd. T or C, NM 87901

Client ID: 111
Sample Location: Outfall 101
Test Type: Compliance
Client Permit: NM0020681

SAMPLE COLLECTION DATA			Collection Started		Collection Completed	
Sample #	Description	Type	Date	Time	Date	Time
111825-13A	Effluent	Composite	11/16/25	0900	11/17/25	0900
112025-26A	Effluent	Composite	11/18/25	0900	11/19/25	0900
112225-04A	Effluent	Composite	11/20/25	0900	11/21/25	0900
SAMPLE RECEIPT DATA						
Sample #	Date Rcvd	Time Rcvd	Temp (°C)	Condition on Receipt		
111825-13A	11/18/25	0900	3.5	Satisfactory		
112025-26A	11/20/25	1400	2.8	Satisfactory		
112225-04A	11/22/25	0918	2.7	Satisfactory		

Test Method/Description:

Short Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms (EPA-821-R-02-013) 7-day Chronic Toxicity, Static Renewal, w/ *Ceriodaphnia dubia* (Method 1002.0) and w/ *Pimephales promelas* (Method 1000.0)

Deviations from Test Method: None.

Statistical Software Utilized: CETIS™ v. 2.1.4.3

Source of Test Organisms: Cove in-house cultures

Dilution Concentrations: 51%, 38%, 29%, 21%, and 16%

Critical Dilution: 38%

Receiving Water: Rio Grande

TEST RESULTS			
Species: <i>C. dubia</i>		Species: <i>P. promelas</i>	
NOEC survival	51%	NOEC survival	51%
NOEC reproduction	51%	NOEC growth	51%
Control survival	100%	Control survival	98%
% CV reproduction (control)	20.47	% CV survival (control)	5.73
% CV reproduction (critical dilution)	23.78	% CV survival (critical dilution)	5.73
Mean number of neonates (control)	26.9	% CV growth (control)	6.49
		% CV growth (critical dilution)	14.34
		Mean dry weight mg (control)	0.482
Results Summary: Effluent did not induce chronic toxicity to either species.			
Test Validity: Valid test. No exceptions to or deviations from the prescribed test method.			
Recommendations: Schedule next test in accordance with permit.			

Attachment D

Docket Number:

CWA-06-2026-1771

Truth or Consequences**NPDES Permit No. NM0020681****Effluent Violations**

Monitoring Period End Date	Parameter	DMR Value	Sample Type	Limit Frequency	Limit Value	Statistical Base	Limit Unit	Percent Exceedance
2/28/2026	Oxygen, dissolved [DO]	4.28	Grab	Weekly	6	MINIMUM	Milligrams per Liter	29
1/31/2026	Oxygen, dissolved [DO]	5.92	Grab	Weekly	6	MINIMUM	Milligrams per Liter	1
11/30/2025	Oxygen, dissolved [DO]	5.66	Grab	Weekly	6	MINIMUM	Milligrams per Liter	6
10/31/2025	Oxygen, dissolved [DO]	5.18	Grab	Weekly	6	MINIMUM	Milligrams per Liter	14
9/30/2025	Oxygen, dissolved [DO]	4.43	Grab	Weekly	6	MINIMUM	Milligrams per Liter	26
8/31/2025	Oxygen, dissolved [DO]	4.38	Grab	Weekly	6	MINIMUM	Milligrams per Liter	27
7/31/2025	BOD, 5-day, percent removal	84.448	Calculated	Monthly	85	MO AV MN	Percent	4
7/31/2025	BOD, 5-day, 20 deg. C	414.184	6 Hour Composit	Weekly	176	30DA AVG	Pounds per Day	135
7/31/2025	pH	5.62	Grab	Daily	6.6	MINIMUM	Standard Units	
7/31/2025	Solids, total suspended	34.436	6 Hour Composit	Weekly	30	30DA AVG	Milligrams per Liter	15
7/31/2025	BOD, 5-day, 20 deg. C	67	6 Hour Composit	Weekly	20	30DA AVG	Milligrams per Liter	235
7/31/2025	Oxygen, dissolved [DO]	5.08	Grab	Weekly	6	MINIMUM	Milligrams per Liter	15
6/30/2025	Oxygen, dissolved [DO]	4.77	Grab	Weekly	6	MINIMUM	Milligrams per Liter	21
5/31/2025	Oxygen, dissolved [DO]	5.44	Grab	Weekly	6	MINIMUM	Milligrams per Liter	9
3/31/2025	Solids, total suspended	106	6 Hour Composit	Weekly	45	7 DA AVG	Milligrams per Liter	136
3/31/2025	Oxygen, dissolved [DO]	5.8	Grab	Weekly	6	MINIMUM	Milligrams per Liter	3
3/31/2025	Solids, total suspended	35.975	6 Hour Composit	Weekly	30	30DA AVG	Milligrams per Liter	20

Attachment E

Docket Number: CWA-06-2026-1771

City of Truth or Consequences
NM0020681
DMR Non-Receipt Violations

Monitoring Period End Date	DMR Due Date	Disch-Desig	Parameter Desc	Statistical Base Desc	Permit Limit Value	Limit Unit	Vio Code	DMR Form Submitted ?	DMR Value Type Code
12/31/2025	Jan 15, 2026	TX1-Q	Pass/Fail Static Renewal 7 Day Chronic Ceriodaphnia dubia	VALUE	Report	pass=0;fail=1	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	Pass/Fail Static Renewal 7Day Chronic Pimephales promelas	VALUE	Report	pass=0;fail=1	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	Low Flow Pass/Fail Survival Test Static Renewal 7 Day Chronic Ceriodaphnia dubia	VALUE	Report	pass=0;fail=1	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	Low Flow Pass/Fail Survival Test Static Renewal 7 Day Chronic Pimephales promelas	VALUE	Report	pass=0;fail=1	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	NOEC Lethal Static Renewal 7 Day Chronic Ceriodaphnia dubia	VALUE	Report	%	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	NOEC Lethal Static Renewal 7 Day Chronic Pimephales promelas	VALUE	Report	%	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	NOEC Sub-Lethal Static Renewal 7 Day Chronic Ceriodaphnia dubia	VALUE	Report	%	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	NOEC Sub-Lethal Static Renewal 7 Day Chronic Pimephales promelas	VALUE	Report	%	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	Coef Of Var Static Renewal 7Day Chronic Ceriodaphnia dubia	VALUE	Report	%	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	Coef Of Var Static Renewal 7Day Chronic Pimephales promelas	VALUE	Report	%	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	LOEC Lethal Survival Static Renewal 7 Day Chronic Ceriodaphnia dubia	VALUE	Report	%	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	LOEC Lethal Survival Static Renewal 7 Day Chronic Pimephales promelas	VALUE	Report	%	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	LOEC Sub-Lethal Reproduction Static Renewal 7 Day Chronic Ceriodaphnia dubia	VALUE	Report	%	D80	No	C3
12/31/2025	Jan 15, 2026	TX1-Q	LOEC Sub-Lethal Reproduction Static Renewal 7 Day Chronic Pimephales promelas	VALUE	Report	%	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	Pass/Fail Static Renewal 7 Day Chronic Ceriodaphnia dubia	VALUE	Report	pass=0;fail=1	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	Pass/Fail Static Renewal 7Day Chronic Pimephales promelas	VALUE	Report	pass=0;fail=1	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	Low Flow Pass/Fail Survival Test Static Renewal 7 Day Chronic Ceriodaphnia dubia	VALUE	Report	pass=0;fail=1	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	Low Flow Pass/Fail Survival Test Static Renewal 7 Day Chronic Pimephales promelas	VALUE	Report	pass=0;fail=1	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	NOEC Lethal Static Renewal 7 Day Chronic Ceriodaphnia dubia	VALUE	Report	%	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	NOEC Lethal Static Renewal 7 Day Chronic Pimephales promelas	VALUE	Report	%	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	NOEC Sub-Lethal Static Renewal 7 Day Chronic Ceriodaphnia dubia	VALUE	Report	%	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	NOEC Sub-Lethal Static Renewal 7 Day Chronic Pimephales promelas	VALUE	Report	%	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	Coef Of Var Static Renewal 7Day Chronic Ceriodaphnia dubia	VALUE	Report	%	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	Coef Of Var Static Renewal 7Day Chronic Pimephales promelas	VALUE	Report	%	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	LOEC Lethal Survival Static Renewal 7 Day Chronic Ceriodaphnia dubia	VALUE	Report	%	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	LOEC Lethal Survival Static Renewal 7 Day Chronic Pimephales promelas	VALUE	Report	%	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	LOEC Sub-Lethal Reproduction Static Renewal 7 Day Chronic Ceriodaphnia dubia	VALUE	Report	%	D80	No	C3
06/30/2025	Jul 15, 2025	TX1-Q	LOEC Sub-Lethal Reproduction Static Renewal 7 Day Chronic Pimephales promelas	VALUE	Report	%	D80	No	C3