

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	August 29, 2023	
Media Program:	Water	
Regulatory Program(s)	CWA	
Company Name:	City of Farmington	
Facility Name:	Farmington Electric Utility System - Bluffview Power Plant	
Facility Physical Location:	101 N. Browning Parkway	
(city, state, zip code)	Farmington, New Mexico 87401-2263	
Mailing address:	800 Municipal Drive	
(city, state, zip code)	Farmington, New Mexico 87401-2263	
County/Parish:	San Juan	
Facility Phone Number	505-427-6604	
Facility Contact:	Jamie Shockey	Generation Superintendent
	jshockey@fmrn.org	
FRS Number:	110062658985	
Identification/Permit Number:	NM0031135	
Media Identifier Number:	N/A	
NAICS:	221121	
SIC:	4911	
Personnel participating in inspection:		
Jamie Shockey	Farmington Electric Utility System- Bluffview Power Plant	Generation Superintendent
Bill Dees	Farmington Electric Utility System- Bluffview Power Plant	Water Treatment Specialist
Ann Woods	Farmington Electric Utility System- Bluffview Power Plant	Environmental Scientist
David Esparza, P.E.	USEPA/R6-ECDWM	Environmental Engineer
EPA Lead Inspector Signature/Date		
	David Esparza	Date
Supervisor Signature/Date		
	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (EPA) Region 6 inspector David Esparza, P.E., arrived at the City of Farmington Electric Utility System (FEUS)- Bluffview Power Plant (BPP) steam electric power plant at approximately 12:30 PM on August 29, 2023, for an unannounced inspection. I met with Mr. Jamie Shockey, Generation Superintendent, Ms. Ann Woods, Environmental Scientist, and Mr. Bill Dees, Water Treatment Specialist. I presented my credentials to Mr. Shockey and informed him that this was an EPA inspection to determine the facility's compliance under the Clean Water Act (CWA) and the requirements of the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the CWA. The generation of this report is based on information supplied by FEUS-Bluffview representatives, observations made by the EPA inspector, NMED, and records and reports maintained by the permittee and the EPA. Before leaving the facility on August 29, 2023, an exit briefing was held with Mr. Shockey, and the above-mentioned individuals to explain areas of concern noted at the time of the inspection.

FACILITY DESCRIPTION

Background

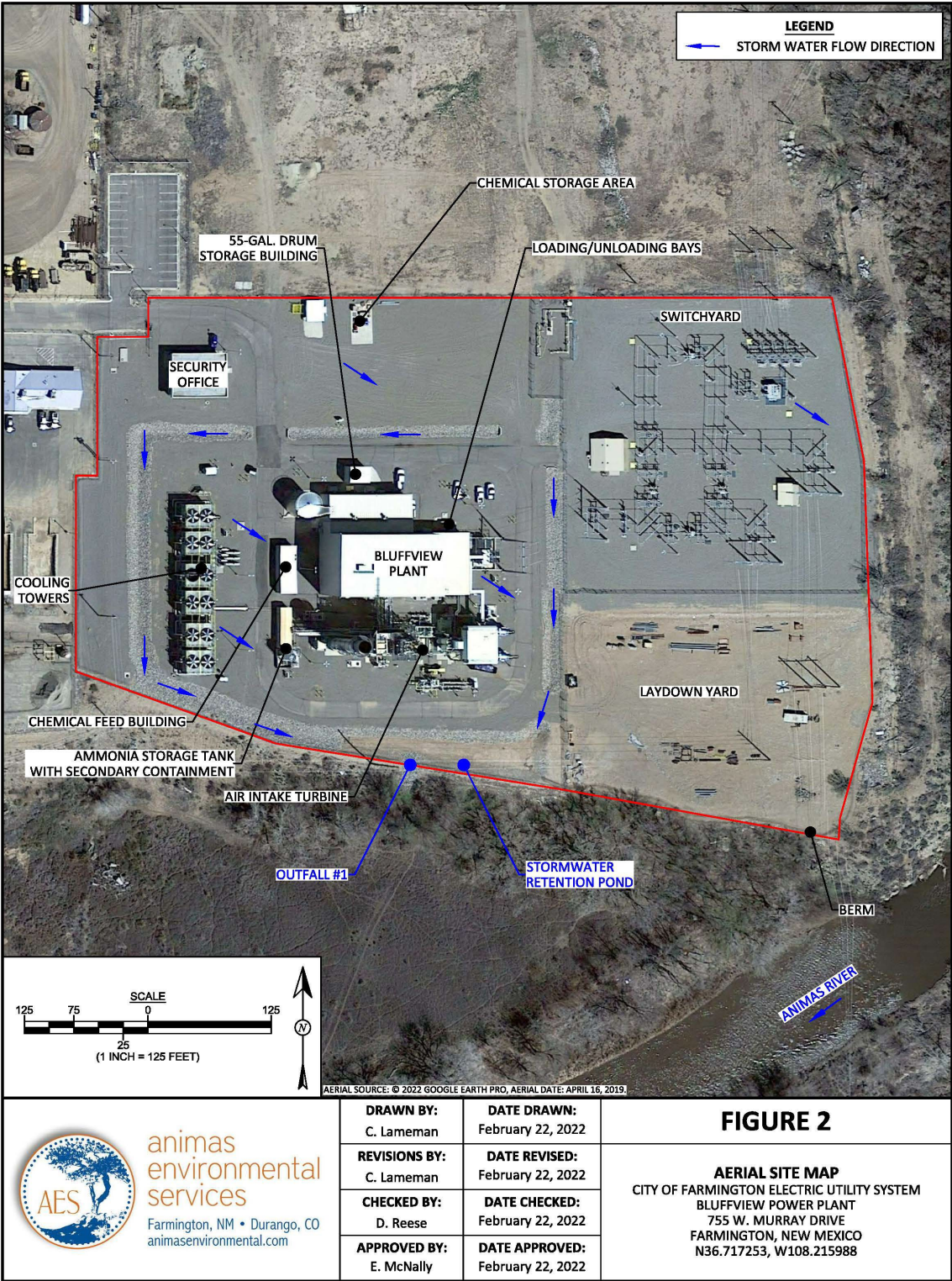
The Bluffview Power Plant originally discharged its wastewater to the City of Farmington Wastewater Treatment Plant (NPDES No. NM0020583). However, because the City WWTP could not meet the effluent limitation for Total Dissolved Solids (TDS) in accordance with the basin wide Colorado River Salinity Control Program (CRSCP), resulting in a TDS permit violation, the City issued an Industrial Pretreatment Program permit to order that the Bluffview Power Plant acquire its own NPDES permit for authorization of wastewater discharges.

The FEUS/BPP is a minor industrial facility (depicted in **Aerial Image #1** below) that discharges wastewaters from cooling tower blowdown, demineralized reverse osmosis wastewater, evaporative cooler (summer only), and various floor drains (including oily water header that is treated by an oil separator, and process areas drain header). Boiler blowdown and city water are used in the cooling tower. The electricity generated at this facility provides power for San Juan County, New Mexico, including both residential and industrial consumers. BPP was constructed in 2004 and commenced commercial operation in May 2005. The facility generates approximately 60 megawatts at full production is located at 755 West Murray Drive, Farmington, San Juan County New Mexico (depicted in **Aerial Site Map Image #2** below; prepared by Animas Environmental Services). The plant is designed to develop electricity in a combined cycle arrangement which includes a natural gas fueled General Electric turbine; the waste heat is captured in a Heat Recovery Steam Generator (HRSG) which produces steam to a Siemens Steam Turbine. The processes used to develop electricity from steam include turbine generators, a heat recovery steam generator, cooling towers, water pump station, sub-station, and other supporting equipment that is utilized to produce and deliver electricity.

Currently FEUS/BPP has 25 full-time equivalent (FTE) personnel operating on a 4-work shift basis.



Aerial Image #1: Overall view of the FEUS-Bluffview Power Plant. Aerial from Google Earth maps.



Aerial Site Map Image #2: Prepared by Animas Environmental Services

Section II – OBSERVATIONS

I observed the following and/or the following information was provided or stated:

- FEUS/BPP does have written Standard Operating Procedures (SOPs) SOPs (initial and revised) for pH and total chlorine analysis. The SOPs are updated when Standard Methods are revised. The last update was September 2023 for both parameters.
- FEUS/BPP recently updated the current Stormwater Pollution Prevention Plan (SWPPP) in September 2023 in accordance with NPDES permit NMR053052 (**Appendix 3 FEUS/BPP Notice of Intent**). Additionally, the facility agreed to make available electronic copies of the applicable weekly, quarterly, and semi-annual inspection reports as requested in the Request for Information (RFI) dated September 6, 2023 (**Appendix 4 Request for Information (RFI)**). Additionally, FEUS/BPP provided copies of their complete Comprehensive Sediment and Erosion Control inspections too.
- FEUS/BPP overall operations and maintenance (O&M), and general facility housekeeping appeared to be in good order.
- The facility did have secure perimeter fencing and lighting; thus, limiting access.

Section III – SUMMARY/AREAS OF CONCERN

- A review of the submitted Integrated Compliance Information System (ICIS) Discharge Monitoring Reports (DMR) data for the period March 31, 2019, through May 31, 2023, indicates numerous NPDES permit excursions with respect to pH, Chlorine, Total Residual (TCR), and Solids, Total Suspended (TSS) (**Appendix 2 ICIS E90 Effluent Violations**).

Section IV – FOLLOW UP

The following information and/or clarification was received by EPA after exiting the Facility on August 29, 2023:

- A complete electronic copy of your Standard Operating Procedures (SOPs) and clarification how often it is updated.
- A current copy of the facility Site Map delineating the total area footprint, locations/volumes of any onsite fuel storage tanks, delineation of processes, all associated ancillary equipment and outfall(s).
- Electronic copies of your Stormwater Pollution Prevention Plan (SWPPP), inclusive of any inspection reports for the previous two (2) years.

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 2 photos taken 8/29/2023

Appendix 2 – ICIS E90 Effluent Violations

Appendix 3 – FEUS/BPP Notice of Intent

Appendix 4 – Request for Information (RFI)

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: FEUS-Bluffview Power Plant		
City: Farmington	County/Parish: San Juan	State: New Mexico



View of FEUS-Bluffview Power Plant Cooling Towers looking approximately Northwest. (DSCN2632).
Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: FEUS-Bluffview Power Plant		
City: Farmington	County/Parish: San Juan	State: New Mexico



View of the FEUS-Bluffview Outfall discharge into the Animas River. (DSCN2634). Photographed by D. Esparza

Appendix 2
Review
of the
ICIS
E90 Effluent Violations

FARMINGTON ELECTRIC UTILITY SYSTEM BLUFFVIEW POWER PLANT**NM0031135**

Monitoring Period End Date	Outfall	Parameter	Statistical Base	Units	Limit Value	DMR Value
01/31/2018	001	pH	MINIMUM	SU	6.6	6.47
05/31/2020	001	Solids, total dissolved	DAILY MX	lb/d	2000.	2243.
06/30/2020	001	Chlorine, total residual	INST MAX	ug/L	19.	39.5
11/30/2020	001	Chlorine, total residual	INST MAX	ug/L	19.	25.5
06/30/2021	001	Solids, total dissolved	DAILY MX	lb/d	2000.	2209.
08/31/2021	001	Chlorine, total residual	INST MAX	ug/L	19.	56.7
05/31/2022	001	Chlorine, total residual	INST MAX	ug/L	19.	48.
12/31/2022	001	Chlorine, total residual	INST MAX	ug/L	19.	68.3
01/31/2023	001	pH	MINIMUM	SU	6.6	6.51

Appendix 3

FEUS/BPP

Notice of Intent

Permit Information

Master Permit Number: NMR050000NPDES ID: NMR053052

Eligibility Information

State/territory where your facility is discharging: NMDoes your facility discharge to federally recognized Indian Country lands? NoAre you a "Federal Operator" as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)?NoWhich type of form would you like to submit? Notice of Intent (NOI)

By indicating "Yes" below, I confirm that I understand that the MSGP only authorizes the stormwater discharges in Part 1.1.2 and the allowable non-stormwater discharges listed in Part 1.2.2. Any discharges not expressly authorized in this permit cannot become authorized or shielded from liability under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the allowable stormwater and non-stormwater discharges listed in Parts 1.2.1. and 1.2.2. will be discharged, they must be covered under another NPDES permit.

YesAre you a new discharger or a new source as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)?No➔ Have stormwater discharges from your facility been covered previously under an NPDES permit? No➔ Are you discharging to any waters of the U.S. that are designated by the state or tribal authority under its antidegradation policy as a Tier 3 water (Outstanding National Resource water)? (See Appendix L (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_l_-_list_of_tier_3_tier_2_and_tier_2.5_waters.pdf))NoDo you anticipate the discharge of groundwater or spring water from your facility? NoWhat is the legal name of the Operator as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)?City of Farmington Electric UtilityWhat is the name of your facility or activity as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)?FARMINGTON (CITY OF) ELECTRIC UTILITY - BLUFFVIEW POWER PLANT

Operator Information

Operator Information

Operator Name: City of Farmington Electric Utility

Operator Mailing Address

Address Line 1: 755 West Murray Drive

Address Line 2:

City: Farmington

ZIP/Postal Code: 87401

State: NM

County or Similar Division: San Juan

Operator Point of Contact Information

First Name Middle Initial Last Name: Eric Jaquez

Title: Environmental Scientist

Phone: 505-599-8345

Ext.:

Email: ejaquez@f mtn.org

Facility Information

Facility Information

Facility Name: FARMINGTON (CITY OF) ELECTRIC UTILITY - BLUFFVIEW POWER PLANT

Facility Address

Address Line 1: 755 WEST MURRAY DRIVE

Address Line 2: 501 N BROWNING PARKWAY

City: FARMINGTON

ZIP/Postal Code: 87401

State: NM

County or Similar Division: San Juan

Latitude/Longitude for the Facility

Latitude/Longitude: 36.715986°N, 108.21485°W

Latitude/Longitude Data Source: Map

Horizontal Reference Datum: WGS 84

General Facility Information

What is the ownership type of the facility? Municipality

Estimated area of industrial activity at your facility exposed to stormwater (rounded to the nearest quarter acre): 12

Is your facility presently inactive and unstaffed? No

Exception for Inactive and Unstaffed Facilities: The requirement for indicator monitoring, impaired waters monitoring, and/or benchmark monitoring does not apply at a facility that is inactive and unstaffed, as long as there are no industrial materials or activities exposed to stormwater.

If circumstances change during the permit term that affect your qualifications for this exception to monitoring requirements (i.e. industrial materials or activities exposure to stormwater or your facility's active/inactive and staffed/unstaffed status) you must submit a NOI notifying EPA of the change in circumstances.

Sector-Specific Information

Primary Sector: O

Primary Subsector: O1

Primary Activity Code: SE

Discharge Information

By indicating "Yes" below, I confirm that I understand that the MSGP only authorizes the stormwater discharges in Part 1.2.1 and the allowable non-stormwater discharges listed in Part 1.2.2. Any discharges not expressly authorized in this permit cannot become authorized or shielded from liability under CWA section 402(k) by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including the Notice of Intent (NOI) to be covered by the permit, the Stormwater Pollution Prevention Plan (SWPPP), during an inspection, etc. If any discharges requiring NPDES permit coverage other than the authorized stormwater and non-stormwater discharges listed in Parts 1.2.1 and 1.2.2 will be discharged, they must be covered under another NPDES permit.

Yes

Federal Effluent Limitation Guidelines

Identify the Effluent Limitation Guideline(s) that apply to your stormwater discharges.

40 CFR Part/Subpart	Eligible Discharges	Affected MSGP Sector	New Source Date	Applicability
Part 423	Coal pile runoff at steam electric generating facilities	O	11/19/1982, 10/08/1974 ⓘ	Does your facility have any discharges subject to this effluent limitation guideline? <u>No</u>

Are you requesting permit coverage for any stormwater discharges subject to effluent limitation guidelines? No

Other Discharge Information

Do you anticipate the discharge of groundwater or spring water from your facility? No

Does your facility discharge into a Municipal Separate Sewer System (MS4)? No

Receiving Waters Information

List all of the stormwater discharge points from your facility.

Discharge Point 001:

Applicable Sectors

Select the Sectors/Subsector(s) that apply to this discharge point.

	Sector	Subsector	SIC/Activity Code
☒	O - STEAM ELECTRIC GENERATING FACILITIES	O1 - Steam Electric Generating Facilities, including coal handling sites	SE

Latitude/Longitude: 36.716°N, 108.2151°W

☐ This discharge point is *Substantially Identical* to an existing discharge point.

Receiving Water

GNIS Name:
n/a

Waterbody Name:
Animas River

Listed Water ID:
n/a

Is this receiving water saltwater or freshwater? Freshwater

Is this receiving water designated by the state or tribal authority under its antidegradation policy as a Tier 2 (or Tier 2.5) water (water quality exceeds levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water)?

Yes

Will you have stormwater discharges from paved surfaces that will be initially sealed or re-sealed with coal-tar sealcoat where industrial activities are located during coverage under this permit?

Yes

Benchmark Monitoring

Are you subject to benchmark monitoring requirements for a hardness-dependent metal? No

Impaired Waters Monitoring

NOTE: The information automatically populated in this section for determining if the receiving water is listed as impaired on the 303(d) list and in need of a TMDL, the cause(s) of the impairment if the receiving water is impaired on the CWA 303(d) list, if a TMDL has been completed for the receiving waterbody, and the TMDL ID and pollutants for which there is a TMDL may be outdated and inaccurate. It is recommended that you consult with your state's guidance for discharges into impaired waters to determine the correct pollutants and TMDLS and update the causes for the impairment and TMDL information accordingly.

Is the receiving water listed as impaired on the 303(d) list and in need of a TMDL? No

Has a TMDL been completed for this receiving waterbody? No

SWPPP Information

Has the SWPPP been prepared in advance of filing this NOI, as required? Yes

SWPPP Contact Information:

First Name **Middle Initial** **Last Name:** Eric Jaquez

Phone: 505-599-8345 **Ext.:**

Email: ejaquez@f mtn.org

SWPPP Availability:

Your current SWPPP or certain information from your SWPPP must be made available through one of the following three options. Select one of the options and provide the required information.

Note: you are not required to post any confidential business information (CBI) or restricted information (as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)) (such information may be redacted), but you must clearly identify those portions of the SWPPP that are being withheld from public access.

☐ **Option 1: Attach a current copy of your SWPPP to this NOI.**

☒ Option 2: Maintain a Current Copy of your SWPPP on an Internet page (Universal Resource Locator or URL).

Provide the web address URL (e.g. <http://www.example.com>): <http://www.fmtm.org/DocumentCenter/View/5086>

☐ Option 3: Provide the following information from your SWPPP:

Endangered Species Protection Worksheet: Criterion C1

The following questions will help you determine your eligibility under Part 1.1.4 of the permit with respect to protection of Endangered Species Act (ESA) species and critical habitat(s). Please refer to Appendix E (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_e_-_procedures_relating_to_endangered_species_protection.pdf) of the 2021 MSGP for important information regarding your obligations under this permit concerning ESA-protected species and critical habitat(s).

Determine ESA Eligibility Criterion

Are your industrial activities already addressed in another operator's valid certification of eligibility for your "action area" under eligibility criteria A, C, D, or E of the 2021 MSGP?

No

Are your industrial activities the subject of a permit under section 10 of the ESA by the USFWS and/or NMFS, and this authorization addresses the effects of your facility's discharges and discharge-related activities on ESA-listed species and critical habitat?

No

You must determine whether species listed as either threatened or endangered under the Endangered Species Act, and/or their critical habitat are located in your facility's action area. ESA-listed species and critical habitat are under the purview of the NMFS and the USFWS.

Determine Your Action Area

Your "action area" (as defined in Appendix A (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_a_-_definitions.pdf)) includes all areas to be affected directly or indirectly by the action and not merely the immediate area involved in the action, including areas beyond the footprint of the facility that are likely to be affected by stormwater discharges, discharge-related activities, and authorized non-stormwater discharges. You must select and confirm that all the following are true:

- ➔ In determining my "action area", I have considered that discharges of pollutants into downstream areas can expand the action area well beyond the footprint of my facility and the discharge point(s). I have taken into account the controls I will be implementing to minimize pollutants and the receiving waterbody characteristics (e.g. perennial, intermittent, ephemeral) in determining the extent of physical, chemical, and/or biotic effects of the discharges. I confirm that all receiving waterbodies that could receive pollutants from my facility are included in my action area.

True

- ➔ In determining my "action area", I have considered that discharge-related activities must also be accounted for in determining my action area. I understand that discharge-related activities are any activities that cause, contribute to, or result in stormwater and authorized non-stormwater point source discharges, and measures such as the siting, construction, and operation of stormwater controls to control, reduce, or prevent pollutants from being discharged. I understand that any new or modified stormwater controls that will have noise or other similar effects, and any disturbances associated with construction of controls, are part of my action area.

True

Provide a written description of your action area and explain your rationale for the extent of the action area drawn on your map. [Click here for an example.](#)

Action area includes the facility, which has an engineered detention basin its southeast corner. In a worst case scenario, stormwater could be discharged from the detention pond south, cross a wooded area, and eventually reach the Animas River. Additionally, the power plant has a storage yard located east of and adjacent to the facility (note that the storage is scheduled to be converted to a maintenance shop, warehouse and offices in about late 2021 or early 2022). The storage yard is completely bermed and stormwater drainage is routed west and drains the detention basin. The action area map is included in the iPAC documentation.

Attach a map of the action area for your facility. Mapping tool iPAC (the Information, Planning, and Consultation System) located at <http://ecos.fws.gov/ipac/> (<https://ecos.fws.gov/ipac/>) or click here (/net-msgp/documents/action_area_example.pdf) for an example.

Name	Uploaded Date	Size
 iPAC facility map.pdf (attachment/704804)	03/23/2021	256.64 KB

Determine if ESA-listed species and/or critical habitat are in your facility's action area.

ESA-listed species and critical habitat are under the purview of the NMFS and the USFWS, and in many cases, you will need to acquire species and critical habitat lists from both federal agencies.

National Marine Fisheries Service (NMFS)

To obtain NMFS-listed species and critical habitat information, use the resources listed below:

General Resources:

- NOAA Fisheries, Regions Page (<https://www.fisheries.noaa.gov/regions>) 

For the Northeastern U.S.:

- NOAA Fisheries Greater Atlantic Region ESA Section 7 Mapper (<https://noaa.maps.arcgis.com/apps/webappviewer/index.html?id=1bc332edc5204e03b250ac11f9914a27>)

For Puerto Rico:

- *Acropora* critical habitat map (<https://www.fisheries.noaa.gov/resource/map/acropora-elkhorn-and-staghorn-coral-critical-habitat-map-and-gis-data>)
- Green turtle critical habitat map (<https://www.fisheries.noaa.gov/resource/map/green-turtle-critical-habitat-map-and-gis-data>)
- Hawksbill Turtle critical habitat map (<https://www.fisheries.noaa.gov/resource/map/hawksbill-turtle-critical-habitat-map-and-gis-data>)

Western U.S.:

- West Coast Region Protected Resources App (<https://www.webapps.nwfsc.noaa.gov/portal/apps/webappviewer/index.html?id=7514c715b8594944a6e468dd25aaacc9>)

Pacific Islands:

- Contact the Pacific Islands Regional Office at (808) 725-5000 or pirohonolulu@noaa.gov (<mailto:pirohonolulu@noaa.gov>)

I have checked the webpages listed above and confirmed that: There are NMFS-listed species and/or critical habitat in my action area.

For NMFS species, include the full printout from the Species Directory with the correct Region selected.

Name	Uploaded Date	Size
 NM Heritage Species List San Juan County.pdf (attachment/713649)	05/24/2021	328.83 KB
 Species List New Mexico Ecological Services Field Office.pdf (attachment/713620)	05/24/2021	225.14 KB

U.S. Fish and Wildlife Service (USFWS)

To obtain FWS-listed species and critical habitat information, use the resources listed below:

- IPaC (the Information, Planning, and Consultation System) (<https://ecos.fws.gov/ipac/>)
- For instructions for using IPaC, click here.

I have checked the webpages listed above and confirmed that: There are FWS-listed species and/or critical habitat in my action area.

For FWS species, include the full printout from your IPaC query/Official Species List.

Name	Uploaded Date	Size
 NM Heritage Species List San Juan County.pdf (attachment/713648)	05/24/2021	328.83 KB
 Species List New Mexico Ecological Services Field Office.pdf (attachment/713647)	05/24/2021	225.14 KB

You may be eligible under **Criterion C**. You must assess whether your discharges and discharge-related activities are likely to adversely affect ESA-listed species or critical habitat, and whether any additional measures are necessary to ensure no likely adverse effects. In order to make a determination of your facility's likelihood of adverse effects, you must complete the Criterion C Eligibility fields below.

Criterion C Eligibility

Select which applies:

Criterion C1: Facility eligible for Criterion C in the 2015 MSGP with no change to ESA-listed species, critical habitat, or action area.

Your facility was eligible for Criterion C in the 2015 MSGP and there has been no change in your facility's action area and you have confirmed that there are no additional ESA-listed species or critical habitat under the jurisdiction of USFWS and/or NMFS in your action area since your certification under Criterion C in the 2015 MSGP. You must provide a description of the basis of this criterion selected on your NOI form and provide documentation supporting your eligibility determination in your SWPPP.

Select which applies:

I am seeking coverage under the MSGP as an existing discharger and there are no modifications to my facility.

Provide a basis statement providing the USFWS and/or NMFS resources consulted that helped you determine that there are no additional ESA-listed species and/or critical habitat have been listed by under the jurisdiction of the Services in your action area.

Review of the iPAC documentation showed that there is not habitat present within the action area that support the presence of the listed species, and additionally, no critical habitat was identified by the iPAC documentation. Note that there are three listed fish species that have critical habitat locations, but the locations are not available. The New Mexico Department of Game and Fish monitor this reach of the Animas River and work with the Animas and San Juan River Watershed groups, of which the City of Farmington is a member, to ensure that river conditions are protective of listed State and Federal species.

Note: Any missing or incomplete information in this section may result in a delay of your coverage under the permit.

Historic Preservation: Criterion A

The following questions will help you determine your eligibility under Part 1.1.5 of the permit with respect to preservation of historic properties. You may still use the paper instructions in Appendix F (https://www.epa.gov/sites/production/files/2021-01/documents/2021_msgp_-_appendix_f_-_procedures_relating_to_historic_properties_preservation.pdf) of the MSGP in advance or in conjunction with answering the questions in this section of the form. For more information about your State Historic Preservation Office (SHPO) or Tribal Historic Preservation Office (THPO), please visit the National Park Service (NPS) websites at:

- State Historic Preservation Office (SHPO) (<https://www.nps.gov/subjects/nationalregister/state-historic-preservation-offices.htm>)
- Tribal Historic Preservation Office (THPO) (https://www.nps.gov/history/tribes/Tribal_Historic_Preservation_Officers_Program.htm)

Are you an existing facility that is resubmitting for certification under the 2021 MSGP? Yes

➔ If you are an existing facility you should have already addressed National Historic Preservation Act (NHPA) issues. To gain coverage under the 2015 MSGP, you were required to certify that you were either not affecting historic properties or had obtained written agreement from the relevant SHPO or THPO regarding methods of mitigating potential impacts.

Will you be constructing or installing any new stormwater control measures? No

You are eligible under **Criterion A**

Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Signing an electronic document on behalf of another person is subject to criminal, civil, administrative, or other lawful action.

Certified By: Eric J. Jaquez

Certifier Title: Environmental Scientist

Certifier Email: ejaquez@f.mtn.org

Certified On: 05/24/2021 3:11 PM ET

Appendix 4

Request for Information (RFI)

Esparza, David

From: Esparza, David
Sent: Wednesday, September 6, 2023 10:39 AM
To: jshockey@fmtn.org; wdess@fmtn.org; awoods@fmtn.org
Cc: Bernier, Roberto; Vaughn, Alan; Matthews, Rachel; Esparza, David
Subject: Farmington Electric Utility System Bluffview Power Plant

Mr. Shockey/Ms. Woods:

As I discussed, this is my follow-up to our conversation on August 29, 2023. To reiterate my understanding, I was informed you would provide copies or make available the information as requested. Additional information might be requested after my review of the received information. The specific request for information (RFI) will be delineated below. Therefore, please forward by email the requested information as soon as possible, but no later than close of business September 13, 2023.

- A complete electronic copy of your Standard Operating Procedures (SOPs) and clarification how often it is updated.
- A current copy of the facility Site Map delineating the total area footprint, locations/volumes of any on-site fuel storage tanks, delineation of processes, all associated ancillary equipment and outfall(s).
- Electronic copies of your Stormwater Pollution Prevention Plan (SWPPP), inclusive of any inspection reports for the previous two (2) years.

David A. Esparza, P.E.
Environmental Engineer
U.S. Environmental Protection Agency
Water Enforcement Branch-Municipal/Industrial Section
Mail Code: 6-ECDWM
1201 Elm Street, Suite 500
Dallas, Texas 75270
(505) 366-8402
eMail: esparza.david@epa.gov



**CITY OF FARMINGTON, NEW MEXICO
ELECTRIC ADMINISTRATION**

101 N Browning Parkway
Farmington, NM 87401
(505) 599-1160
Fax (505) 599-8323

September 13, 2023

Re: EPA Inspection Records Request, NPDES Permit No.

Mr. David A. Esparza
Environmental Engineer
U.S. Environmental Protection Agency
Region 6
Water Enforcement Branch-Municipal/Industrial Section
1201 Elm Street, Suite 500
Dallas, Texas 75270

Dear Mr. Esparza,

On August 29, 2023, you conducted a compliance inspection on behalf of the U.S. Environmental Protection Agency (US EPA) of the Bluffview Power Plant, MSGP Permit No. NMR053052. On September 6, 2023 the Farmington Electric Utility System (FEUS) received an email for records requested during the inspection. Listed below are requested information to be submitted no later than close of business September 13, 2023.

1. A complete electronic copy of your Standard Operating Procedures (SOPs) and clarification how often it is updated.
2. A current copy of the facility Site Map delineating the total area footprint, locations/volumes of any on-site fuel storage tanks, delineation of processes, all associated ancillary equipment and outfall(s).
3. Electronic copies of your Stormwater Pollution Prevention Plan (SWPPP), inclusive of any inspection reports for the previous two (2) years.

Item No. 1 includes electronic copies of the SOPs (initial and revised) for pH and total chlorine analysis. The SOPs are updated when Standard Methods are revised

Item No. 2 is included with the Bluffview SWPPP as Figure 2, Aerial Site Map.

Item No. 3 includes SWPPP inspection reports from August 29, 2021 to August 29, 2023.

Should you have any further questions, please contact Ann Woods, Environmental Scientist at annwoods@fmtn.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Britt Chesnut", with a large, stylized flourish extending to the right.

Britt Chesnut
Generation Assistant Director
FEUS

Ann Woods
FEUS

File