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ENVIRONMENT DEPARTMENT

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BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

Certified Mail – Return Receipt Requested

December 18, 2017

Mr. David Aranda, Plant Manager
El Paso Electric / Rio Grande Power Station
P.O. Box 982
El Paso, Texas 79960-0982

Re: El Paso Electric; Rio Grande Power Station; Minor, Non-Municipal; SIC 4911; NPDES Compliance Evaluation Inspection; NM0000108; November 16, 2017

Dear Mr. Aranda:

Enclosed please find a copy of the report and check list 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 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.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report. 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 in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

David Long
NPDES Enforcement Coordinator
Environmental Protection Agency, Region 6
NPDES Enforcement Branch (6EN-WM)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Sarah Holcomb
Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Erin Trujillo at 505-827-0418 or at erin.trujillo@state.nm.us.

Sincerely,

/s/Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
Nancy Williams, USEPA (6EN-WC) by e-mail
Brent Larsen and Tung Nguyen, USEPA (6WQ-PP) by e-mail
Isaac Chen, USEPA (6WQ-PP) by e-mail
Michael Kesler, NMED District III by e-mail
Aida G. Mauricio, El Paso Electric by e-mail

EPA

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
N	5	NM0000108	170111	C	S	2

Remarks: STEAM ELECTRIC POWER STATION

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
	4	N	N	MINOR

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*
El Paso Electric Company, Rio Grande Power Station, 3501 Doniphan Drive, Sunland Park, New Mexico 88063. From I-10 (Texas), take Exit 13, Travel ½ Mile West on Sunland Park Drive, then 0.9 Miles South on Doniphan Drive to plant on right. Doña Ana County

Entry Time /Date
~0845 hours / 11/16/2017

Exit Time/Date
~1225 hours / 11/16/2017

Permit Effective Date
08/01/2013

Permit Expiration Date
07/31/2018

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
-Aida G. Mauricio / El Paso Electric Company, Principal Env. Eng / 915-543-5956 & Fax 543-5802
-See attached list

Other Facility Data
Outfall 001 at Rio Grande:
Lat 31.80356°
Long -106.54633°

Outfall 002 at Montoya Drainage Canal:
Lat 31.804428°
Long -106.549904°

SIC 4911

Name, Address of Responsible Official/Title/Phone and Fax Number
David Aranda, Plant Manager, Rio Grande Power Station
El Paso Electric, P.O. Box 982, El Paso, Texas 79960-0982 / 915-543-2959

Contacted: Yes * No

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	S	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	M	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. See attached checklist report and further explanations.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Erin S. Trujillo */s/Erin S. Trujillo*	**NMED/SWQB/505-827-0418**	**12/18/2017**
Signature of Management QA Reviewer	**Agency/Office/Telephone/Fax**	**Date**
Jennifer Foote */s/Jennifer Foote*	**NMED/SWQB/505-827-2795**	**12/18/2017**

El Paso Electric / Rio Grande Station / November 16, 2017	PERMIT NO. **NM0000108**

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED* ***No***)
DETAILS: **Renewal application shall be submitted at least 180 days before 07/31/2018 (02/01/2018).**

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	☒ Y ☐ N ☐ NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	☐ Y ☐ N ☒ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	☒ Y ☐ N ☐ NA
4. ALL DISCHARGES ARE PERMITTED	☒ Y ☐ N ☐ NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☒ S ☐ M ☐ U ☐ NA (*FURTHER EXPLANATION ATTACHED* ***No***)
DETAILS: **Previous CEI on 12/02/2014. Approved for NetDMR on 12/29/2011.**

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	☒ Y ☐ N ☐ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	☒ S ☐ M ☐ U ☐ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	☒ Y ☐ N ☐ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	☒ Y ☐ N ☐ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	☒ Y ☐ N ☐ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	☒ Y ☐ N ☐ NA
e) DATES AND TIMES OF ANALYSES.	☒ Y ☐ N ☐ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	☒ Y ☐ N ☐ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	☒ S ☐ M ☐ U ☐ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	☒ S ☐ M ☐ U ☐ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	☐ Y ☐ N ☒ NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED* ***No***)
DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.	☒ S ☐ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED. **Computerized work order process system**	☒ S ☐ M ☐ U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. **Power station has equivalent power sources**	☒ S ☐ M ☐ U ☐ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. **Power Plant's Industrial Control System Operational**	☒ S ☐ M ☐ U ☐ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE	☒ S ☐ M ☐ U ☐ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	☒ S ☐ M ☐ U ☐ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	☒ S ☐ M ☐ U ☐ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	☒ Y ☐ N ☐ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. **Staff may need to review TRC alarm levels.**	☒ Y ☐ N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	☒ Y ☐ N ☐ NA

El Paso Electric / Rio Grande Station / November 16, 2017	PERMIT NO. **NM0000108**

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? ☐ Y ☒ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? ☐ Y ☐ N ☒ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? ☐ Y ☐ N ☒ NA

10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? ☐ Y ☒ N ☐ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT? ☐ Y ☐ N ☒ NA

SECTION D - SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED* ***No*** *).*
DETAILS: **NPDES compliance monitoring locations and process control sampling locations were not labeled.**

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT. **See note above on labels.** ☒ Y ☐ N ☐ NA

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES**.** ☒ Y ☐ N ☐ NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT. ☐ Y ☐ N ☒ NA

4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. ☒ Y ☐ N ☐ NA

5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. ☒ Y ☐ N ☐ NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE ☒ Y ☐ N ☐ NA

a) SAMPLES REFRIGERATED DURING COMPOSITING. ☒ Y ☐ N ☐ NA

b) PROPER PRESERVATION TECHNIQUES USED. ☒ Y ☐ N ☐ NA

c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3. ☒ Y ☐ N ☐ NA

7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT? ☒ Y ☐ N ☐ NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED* ***No*** *)*
DETAILS**:**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. ☒ Y ☐ N ☐ NA
TYPE OF DEVICE **Flowmeters**

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. ☒ Y ☐ N ☐ NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. ☒ Y ☐ N ☐ NA

4. CALIBRATION FREQUENCY ADEQUATE. ☒ Y ☐ N ☐ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES. ☒ Y ☐ N ☐ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. ☒ Y ☐ N ☐ NA

5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. ☐ Y ☐ N ☒ NA

6. HEAD MEASURED AT PROPER LOCATION. ☐ Y ☐ N ☒ NA

7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES. ☒ Y ☐ N ☐ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED* ***Yes*** *)*
DETAILS: **pH and TRC conducted at on-site laboratory. Contract laboratories were not evaluated (not inspected).**

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)* **Contract Laboratory Reports** ☒ Y ☐ N ☐ NA

El Paso Electric / Rio Grande Station / November 16, 2017	PERMIT NO. **NM0000108**

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. **Certified / Calibrated thermometer** ☐ S ☒ M ☐ U ☐ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. **Written procedures under review / Updates in Progress** ☒ S ☐ M ☐ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. **>10** % OF THE TIME. ☒ Y ☐ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. **~100** % OF THE TIME. **Batch Spikes** ☒ Y ☐ N ☐ NA

7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NA

LAB NAME	**1) Alamo Analytical Laboratories, LTD, 310-340-8121**	**2) Stillmeadow, Inc., 281-240-8828**
LAB ADDRESS	**10526 Gulfdale, San Antonio, TX 78216**	**12852 Park One Drive, Sugar Land, TX 77478**
PARAMETERS PERFORMED	**All except WET, pH and TRC**	**WET**

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☒ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED **No**).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	No discharge	No discharge	No discharge	No discharge	No discharge	No discharge	None
002	Not observed	Not observed	Not observed	Not observed	Not observed	Not observed	None
Internal Outfalls	No discharge	No discharge	No discharge	No discharge	No discharge	No discharge	None

RECEIVING WATER OBSERVATIONS: **Discharge pipe to Outfall 001 is disconnected. No reported effluent exceedances/excursions. Rio Grande was flowing.**

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☐ U ☒ NA *(FURTHER EXPLANATION ATTACHED **No**).*
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☐ S ☐ M ☐ U ☐ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☐ S ☐ M ☐ U ☐ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: _____ (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED **No**).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☒ N ☐ NA

2. TYPE OF SAMPLE OBTAINED

GRAB _____ COMPOSITE SAMPLE _ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☒ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☒ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☒ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☒ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☒ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☒ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☒ NA

El Paso Electric Company / Rio Grande Power Station
NPDES Permit #NM0000108
Compliance Evaluation Inspection
November 16, 2017

Further Explanations

Introduction

On November 16, 2017, a Compliance Evaluation Inspection (CEI) was conducted at the El Paso Electric Company, Rio Grande Power Station at Sunland Park, New Mexico by Erin S. Trujillo of the State of New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB). El Paso Electric is classified as a minor discharger under the federal Clean Water Act, Section 402 National Pollutant Discharge Elimination System (NPDES) permit program and is assigned permit number NM0000108. This permit allows discharges to the Montoya Drain, thence to the Rio Grande; and to the Rio Grande in Segment 20.6.4.101 of the State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC).

NMED performs a certain number of CEI's for the U.S. Environmental Protection Agency (USEPA) each year. The purpose of this inspection is to provide USEPA with information to evaluate the Permittee's compliance with the NPDES permit. The enclosed report is based on review of files maintained by both the Permittee and NMED, on-site observation by NMED personnel and verbal information provided by the Permittee representatives.

Ms. Trujillo conducted an entrance interview with Mr. David Aranda, Plant Manager, Aida G. Mauricio, Principal Environmental Engineer, and other El Paso Electric staff (list is attached) upon arrival at approximately 0845 hours on the day of this inspection. The inspector made introductions, presented credentials, and discussed the purpose of the inspection. An exit interview to discuss preliminary findings of this inspection was conducted on-site with Mr. Aranda, Ms. Aida G. Mauricio and other staff. The inspector left the facility gate at approximately 1225 hours on the day of this inspection.

Treatment Scheme (Incorporates Comments from El Paso Electric dated January 8, 2015)

The Rio Grande Power Station, a steam electric facility, initiated operations in 1929. Power plant units 1-5 have been retired. Fuel oil for emergency purposes is no longer available at the facility. The station can operate four units fueled with natural gas identified as Units 6, 7, 8, and 9:

Unit 6 – Output 50 Megawatts, Commissioned 1957, Steam Turbine
Unit 7 – Output 50 Megawatts, Commissioned 1958, Steam Turbine
Unit 8 – Output 150 Megawatts, Commissioned 1972, Steam Turbine
Unit 9 – Output 100 Megawatts, Commissioned 2013, Simple Cycle Gas Turbine

Information in the Permittee's 2011 application indicated that the discharge (water balance) would not change with the addition of power station Unit 9. There are four cooling towers associated with the units identified as No. 6, 7, 8 and 9. Cooling tower 9, also installed in 2013, may be routed to lines associated with heat exchangers No. 6, 7 and 8.

Water sources include municipal water supply and groundwater wells. Some wastewater is reused at the facility. The facility has two canals. The upper canal is used to store wastewater and the lower canal is used to store stormwater. The lower canal is permitted to discharge through Outfall 001. There has not been any discharge from Outfall 001 since May 2010. The pipe from the lower canal to Outfall 001 is disconnected. The upper canal receives rainfall precipitation, groundwater from wells and some

wastewater. The cooling towers use groundwater from wells, water from the upper canal and municipal supplied water. Treated cooling tower blowdown discharges to the Montoya Canal thence to the Rio Grande through Outfall 002.

Metal cleaning wastewater generated from hydroblasting the main heat exchangers, condenser and smaller service heat exchangers discharge through floor drains from the power plant units to oil/water separators before being routed to the upper canal. Incorporating information provided by Permittee Representatives, metal cleaning wastewater is generated two ways. Hydro-blasting is used to clean heat exchangers. Water is recirculated between the affected heat exchanger and a 10,000 gallon poly tank. The wastewater is collected within this tank, sampled, and discharged through internal outfalls 106, 107 and/or 108, if analytical testing meets NPDES permit compliance. If analytical testing demonstrates potential non-conformance with permit, the wastewater is transported to the Newman Power Plant located in El Paso, Texas for disposal by evaporation as permitted by TPDES WQ-000836. Cleaning frequency of heat exchanger per unit is approximately 1-2 times per year, as needed. Each cleaning generates approximately 3,000 to 5,000 gallons per unit per cleaning. Transporting all metal cleaning wastewater is considered. Boiler chemical cleaning is conducted as needed based on industry standards. Wastewater collected and stored in Frac Tanks. The estimated volume generated is 100,000 to 120,000 gallons per boiler per cleaning event at a frequency of every 3 to 5 years per boiler (Units 6, 7 and 8). Testing for boiler chemical cleaning is conducted in conformance with Resource Conservation Recovery Act (RCRA) regulations and transported to the Newman Power Plant for disposal by evaporation as permited by TPDES WQ-00836.

Several pipes of various materials (e.g., steel, PVC, iron), sizes and schedules from the facility enter and discharge into the upper and lower canals. The facility has a pipe identification project to document wastewater sources. Permittee representatives described submitting an updated facility schematic and pipe identification as part of the renewal application.

Booms and absorbent pads (pillows or socks) are used in the upper canal to remove and control oil. Booms in the canals are inspected weekly and changed as needed according to on-site Permittee representatives. No oil sheens were observed in canal water or on the canal banks on the day of this inspection. Water levels in the upper canal are normally maintained by re-circulation to cooling towers. Canal water levels are visually inspected daily and the estimated height is recorded on logs according to on-site Permittee representatives.

Cooling tower water is treated to control scale, solids, corrosion, pH and algae through chlorination and other chemicals. The discharge is de-chlorinated mechanically. Sodium bisulfate is added based on flow through the facility and is adjusted as needed. Compliance monitoring samples of the cooling tower blowdown effluent are collected from a sampling valve after de-chlorination and prior to discharge at Outfall 002.

Areas Evaluated during Inspection (see USEPA Form 3560-3 and Checklist)

Section D – Self Monitoring – Overall Rating of "S" = Satisfactory
Section C – Operations and Maintenance – Overall Rating of "S" = Satisfactory

Comments:

- NPDES compliance monitoring locations and process control sampling locations were not labeled. A filter existed in the line to the process control sampling port. Flow to the process control sampling port would not be representative of all pollutants discharged to Outfall 002. Labeling would identify the two different purposes of the sampling ports and help to ensure that representative samples continue to be obtained for Outfall 002 to determine compliance under the NPDES permit (See Part III.C.2 of the Permit).

- Permittee representatives described process control alarms used to monitor chlorine concentrations and a review of standard operating procedures (SOP) at the plant. Due to the low Total Residual Chlorine (TRC) effluent concentrations (See Part I of the Permit), SOP reviews should include TRC alarm levels and calibrations (See Part III.B.3 Proper Operations and Maintenance).

Section F– Laboratory – Overall Rating of "M" = Marginal

Permit Requirements for Laboratory

Part III.C.5 a and b (Standard Conditions, Monitoring Procedures) of the permit states:

> *a. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this pemtit or approved by the Regional Administrator.*
>
> *b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.*

Findings for Laboratory

- Part I.A of the permit requires monitoring for pollutants (e.g., TSS, TDS and WET) that have cooling preservation requirements in Table II of 40 CFR 136.3 of less than or equal to 6°C. Permittee representatives described using an on-site dedicated refrigerator to temporarily store samples. Temperatures in the refrigerator were measured and recorded by thermometers. However, the thermometers were not checked or calibrated using a National Institute of Standards and Technology (NIST) thermometer.

- Additional Information: USEPA National Pollutant Discharge Elimination System Compliance Inspection Manual, Table 5-4 quality control procedures for field analyses and equipment states, *"All standardization should be against a traceable NIST or NIST calibrated thermometer…Biweekly, check at two temperatures against a NIST or equivalent thermometer…Temperature readings should agree within ±1°C or the thermometer should be replaced or recalibrated."*

Comments for Laboratory

- Part I.A of the permit required monitoring for Oil and Grease. USEPA approved methods in 40 CFR 136.3 for oil and grease, total recoverable, mg/L include, among other, two EPA methods (1664 Rev. A and 1664 Rev. B). Records provided for review only indicated 1664 and not the revision on the analytical testing report. Other methods used included Standard Methods where the approval year is listed in 40 CFR 136.3 (e.g., TSS approved methods include SM 2540 D-2011). The Permittee can contact the laboratory to provided more information to document approved methods, revisions and date of approvals to ensure compliance with 40 CFR 136.3.

Sincerely,

/s/Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
Nancy Williams, USEPA (6EN-WC) by e-mail
Brent Larsen and Tung Nguyen, USEPA (6WQ-PP) by e-mail
Isaac Chen, USEPA (6WQ-PP) by e-mail
Michael Kesler, NMED District III by e-mail
Aida G. Mauricio, El Paso Electric by e-mail

Attachment – NPDES CEI – 11/16/2017

Name/Contact List

EL PASO ELECTRIC

NPDES - Evaluation 11/16/2017

Rio Grande Power Plant

Aida Mauricio	915 543-5956	
JORGE GARCIA	915 543-2966	ops SUPERVISOR
Victor c. Fernandez	915 543-2956	LAB Tech.
DAVID BARRAZA	915-474-4616	Superintendent ops.
ERIN TRUJILLO, NMOS	505-827-0418	
DAVID ARANDA	(915) 543-2959	PLANT MGR.
CARMEN SANTILLAN	915 543-5731	ENV. FIELD CON
JESUS JIMENEZ	915-472-1023	ENGINEERING