



**NEW MEXICO  
ENVIRONMENT DEPARTMENT**



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RYAN FLYNN  
Cabinet Secretary  
BUTCH TONGATE  
Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

July 7, 2015

Mr. Britt Chesnut, Generation Manager  
City of Farmington, Electric Utility System  
501 McCormick School Road  
Farmington, NM 87401

Re: Minor Industrial, SIC 4911, NPDES Compliance Evaluation Inspection, City of Farmington, Electric Utility System, NM0000043, June 29, 2015

Dear Mr. Chesnut,

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:

Gladys Gooden-Jackson  
US Environmental Protection Agency, Region VI  
Enforcement Branch (6EN-WM)  
1445 Ross Avenue  
Dallas, Texas 75202-2733

Bruce Yurdin  
New Mexico Environment Department  
Surface Water Quality Bureau  
Point Source Regulation Section  
P.O. Box 5469  
Santa Fe, New Mexico 87502

If you have any questions about this inspection report, please contact Sarah Holcomb at 505-827-2798 or at [sarah.holcomb@state.nm.us](mailto:sarah.holcomb@state.nm.us).

Sincerely,

*/s/ Bruce Yurdin*

Bruce J. Yurdin

Program Manager

Point Source Regulation Section

Surface Water Quality Bureau

cc: Rashida Bowlin, USEPA (6EN-AS) by e-mail  
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail  
Gladys Gooden-Jackson, USEPA (6EN-WM) by e-mail  
Brent Larsen, USEPA (6WQ-PP) by e-mail  
Raquel Douglas, USEPA (6EN-WC) by e-mail  
NMED District 2, Bob Italiano by e-mail



### NPDES Compliance Inspection Report

#### Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 N M 0 0 0 0 0 4 3	11 12 1 5 0 6 2 9 17	18 C	19 S	20 2	
Remarks					
E L E C T R I C G E N E R A T I O N					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 4	71 N	72 N	73	74 75 80

#### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) <b>CITY OF FARMINGTON, ELECTRIC UTILITY SYSTEM, ANIMAS POWER PLANT, 501 MCCORMICK SCHOOL ROAD, FARMINGTON, NM; SAN JUAN COUNTY: From US 64 (east side of Farmington) at 1200 E. Broadway Ave., turn southwest onto McCormick School Rd., travel one block, plant on right.</b>	Entry Time /Date 1246 / 6-29-2015	Permit Effective Date 10-1-2011
	Exit Time/Date 1430 / 6-29-2015	Permit Expiration Date 9-30-2016
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Mr. Aaron Dailey, Environmental Scientist (505) 599-8345</b>	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Mr. Britt Chesnut, Power Plant Generation Manager, City of Farmington Electric Utility System 501 McCormick School Rd., Farmington, NM 87401 (505) 599-8342</b>	GPS: N. 36.725611° W -108.191316°  SIC: 4911  Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

#### Section C: Areas Evaluated During Inspection

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

S	Permit	N	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	N	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	N	Laboratory	N	Storm Water	N	Other:

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

- INSPECTOR ARRIVED AT THE FACILITY AT 1246 HOURS ON JUNE 29, 2015. THE INSPECTOR CONDUCTED AN ENTRANCE INTERVIEW WITH MR. AARON DAILEY, WHERE SHE MADE INTRODUCTIONS, PRESENTED CREDENTIALS AND EXPLAINED THE PURPOSE OF THE INSPECTION.
- PLEASE SEE REPORT FOR FURTHER EXPLANATIONS.
- AN EXIT INTERVIEW TO DISCUSS THE PRELIMINARY FINDINGS OF THE INSPECTION WAS CONDUCTED WITH MR. DAILEY AND MR. BRITT CHESNUT, GENERATION MANAGER, AT THE FACILITY AT APPROXIMATELY 1415 HOURS ON JUNE 29, 2015.

Name(s) and Signature(s) of Inspector(s) <b>Sarah Holcomb /s/ Sarah Holcomb</b>	Agency/Office/Telephone/Fax <b>505-827-2798</b>	Date <b>7-8-15</b>
Signature of Management QA Reviewer <b>Bruce Yurdin /s/ Bruce Yurdin</b>	Agency/Office/Phone and Fax Numbers <b>505-827-2795</b>	Date <b>7-8-15</b>

## SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS  
DETAILS:

S  M  U  NA (FURTHER EXPLANATION ATTACHED YES)

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.  
DETAILS: NO DISCHARGE SINCE 2013.

S  M  U  NA (FURTHER EXPLANATION ATTACHED NO)

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.  
DETAILS:

S  M  U  NA (FURTHER EXPLANATION ATTACHED NO)

1. TREATMENT UNITS PROPERLY OPERATED.

S  M  U  NA

2. TREATMENT UNITS PROPERLY MAINTAINED.

S  M  U  NA

3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .

S  M  U  NA

4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.

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.  
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.  
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.

Y  N  NA  
 Y  N  NA  
 Y  N  NA

## 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:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.  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 Outfall 001 magnetic meter; Outfall 003 and 003A pump rate output

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 NO)  
 DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)  Y  N  NA

**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.  S  M  U  NA

4. QUALITY CONTROL PROCEDURES ADEQUATE.  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.  Y  N  NA

7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME Farmington WWTP

LAB ADDRESS 800 Municipal Dr., Farmington NM

PARAMETERS PERFORMED pH, TSS, contracts oil & grease out to ERMI Environmental Labs in Allen, TX

**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						
003	No Discharge						
003A	No Discharge						

RECEIVING WATER OBSERVATIONS

**SECTION H - SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED NO).

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: N/A (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

**Compliance Evaluation Inspection  
City of Farmington Animas Steam Plant  
NPDES Permit No. NM0000043  
June 29, 2015**

**Introduction**

On June 29, 2015, Sarah Holcomb of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the City of Farmington, Electric Utility System, Animas Power Plant, 501 McCormick School Road, Farmington, NM 87401 in San Juan County. The Animas Power Plant is classified as a minor industrial discharger under the Federal Clean Water Act, Section 402, of the National Pollutant Discharge Elimination System (NPDES) permit program. It is assigned NPDES permit number NM0000043. This permit regulates the discharge of once-through cooling water and screen wash to Willet Ditch thence to the Animas River in Segment 20.6.4.403 according to the *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 NMAC*. This segment includes the designated uses of public water supply, industrial water supply, irrigation, livestock watering, wildlife habitat, marginal coldwater aquatic life, primary contact and warmwater aquatic life.

The NMED performs a certain number of CEIs for the U.S. Environmental Protection Agency (USEPA), Region VI, under the NPDES permit program, in accordance with the Federal Clean Water Act. USEPA uses these inspections to determine compliance with the NPDES permit program. This inspection report is based on information provided by the permittee's representatives, observations made by the NMED inspector, and records and reports kept by the permittee and/or NMED.

Upon arrival at the facility at 1246 hours on June 29, 2015, the inspector conducted an entrance interview with Mr. Aaron Dailey, Environmental Scientist, where she made introductions, presented credentials and explained the purpose of the inspection. The inspector then conducted a tour of the facility with Mr. Dailey. An exit interview was conducted with Mr. Dailey and Mr. Britt Chesnut, Generation Manager, at the facility at approximately 1415-1430 hours on June 29, 2015 to present the preliminary findings of the inspection.

**Treatment Scheme**

The Farmington Electric Utility System is owned and operated by the City of Farmington and serves approximately 44,000 customers. The service territory encompasses the City of Farmington, most of the populated area of San Juan County (including the City of Bloomfield and the San Juan River Valley west from the City to the Navajo Reservation) and a portion of Rio Arriba County northeast of the City. The Electric Utility System also provides transmission services for the City of Aztec, which owns its own substation and distribution facilities to Williams Field Services. The Animas Power Plant in the utility system was originally built in 1929 as a hydroelectric generating unit. From 1955 through 1959, four steam turbines and boilers were constructed. Until March of this year, the approximately 50.3 megawatt steam electric generation facility consists of five generating units. Two conventional steam turbines (Units 1 and 2) are used in combined cycle arrangement with an 18,680 KW natural gas fired combustion turbine constructed in 1993. Two conventional steam units (Units 3 and 4) were retired in 2000 and 1995, respectively, due to the cost of operations/inefficiency of those units, according to the on-site permittee representative. The process used to develop electricity from steam includes turbine generators, heat recovery steam generator (HRSG), cooling towers, water pump station, sub-station and other supporting equipment.

In March, the facility completed the conversion to a simple cycle generating unit. The current system is fired by natural gas provided by NM Gas Company. The cooling towers have been removed, and demolition of the structures was officially finished on June 26, 2015. The permittee plans to fill in the footprints with base course. There is not a discharge from the facility, and the city may be discussing plans to terminate the NPDES permit for this generating station.

**Compliance Evaluation Inspection  
City of Farmington Animas Steam Plant  
NPDES Permit No. NM0000043  
June 29, 2015**

**Further Explanations**

Note: The sections are arranged according to the format of the enclosed EPA Inspection Checklist (Form 3560-3), rather than being ranked in order of importance.

**Section A – Permit Verification Evaluation** – Overall rating of *Satisfactory*

The permit requires in Part I.A.6:

*The permittee shall notify both EPA and NMED within thirty (30) days of final location of Outfall 004. The permittee shall provide a descriptive and global position location of the final outfall. Reference to existing facility structures; other final outfall locations, significant buildings etc., shall be included in the descriptive location.*

**Findings** for Permit Verification:

The Animas Steam Plant just completed a conversion from a combined cycle facility to a simple cycle, peaking operation-only facility. Permittee representatives indicated that it should only be running approximately 1-2 times per year when need is the greatest. The historic hydroplant is still located on site, and permittee representatives indicate that there is the possibility that it could be refurbished and restarted in the future, but there are no concrete plans at this time for that to occur. The hydroplant is capable of 0.2 MW of generation power.

All discharges have ceased into the Animas River, Willets Ditch and/or the Farmington sanitary sewer system. All equipment was locked out/tagged out at the time of this inspection and all pertinent chemicals have been removed from the site. Some used oil and baking soda still are stored on site. Used oil is removed as needed, and baking soda is located on the premises for spill cleanup purposes.

The inspector confirmed that the 2 steam powered 2.5 MW turbines have been rendered inoperable through equipment removal.

The current setup consists of the turbine, which is capable of generating 19-20 MW. This is fired by natural gas and circulates approximately 2,000 gallons of lube oil. The heat exchanger unit also contains about 1,000 gallons of lube oil. The cooling towers have been demolished and an open footprint existed on site at the time of this inspection. Residual water was still contained in both footprints. According to the permittee representative, the plan is to allow the water to evaporate as much as possible, but that they would evaluate the water using the Farmington POTW's local limits for discharge to the sanitary sewer.

The City is actively evaluating the ability to terminate the NPDES permit for this facility.

**Compliance Evaluation Inspection  
City of Farmington Animas Steam Plant  
NPDES Permit No. NM0000043  
June 29, 2015**

NMED/SWQB

**Official Photograph Log  
Photo # 1**

Photographer: Sarah Holcomb	Date: 6-29-2015	Time: 1353 hours
City/County: Farmington/San Juan County		
Location: Farmington Animas Steam Plant, 501 McCormick School Rd.		
Subject: Footprints of the old cooling towers that were newly demolished at the time of this inspection. Residual water will be evaporated as much as possible and may be discharged to the city's sanitary sewer, if it meets the local limits under the pretreatment program.		



**Compliance Evaluation Inspection  
City of Farmington Animas Steam Plant  
NPDES Permit No. NM0000043  
June 29, 2015**

NMED/SWQB

**Official Photograph Log  
Photo # 2**

Photographer: Sarah Holcomb	Date: 6-29-2015	Time: 1354 hours
City/County: Farmington/San Juan County		
Location: Farmington Animas Steam Plant, 501 McCormick School Rd.		
Subject: The existing gas turbine and heat exchanger unit.		



UTAH COLO.  
ARIZ.

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

FARMINGTON ELECTRIC  
UTILITY SYSTEM

501 McCormick School Road  
Farmington, NM 87401-2663  
(505)599-8343  
Animas Fax (505)326-2315  
Bluffview Fax (505)327-7430  
<http://www.farmington.nm.us>

July 13, 2015

Gladys Gooden Jackson  
US Environmental Protection Agency, Region VI  
Water Enforcement Branch (6EN-WM)  
1445 Ross Avenue  
Dallas, Texas 75202-2733

RE: COMMENT to NPDES Permit No. NM0000043, Farmington Electric Utility Animas Plant, NPDES Compliance Evaluation Inspection, June 29, 2015

VIA FEDERAL EXPRESS <Tracking # 8065 3138 0178 (EPA), # 8065 3138 0189 (NMED)> AND ELECTRONIC MAIL

Dear Ms. Gooden Jackson,

The purpose of this letter is to highlight a minor operational technical clarification to be made in the June 25, 2015 Compliance Evaluation Report conducted on the Animas Plant NPDES NM0000043 permit:

In Section A, "Findings (Page 7/10 of the inspection report package)," the report states that the Animas plant "...should only be running approximately 1-2 times per year when need is the greatest." It is correct that the Animas plant is now configured to operate as a peaking unit; however the estimated operating time per year is estimated to be a cumulative total of one to two months per year (i.e. 700 to 1500 hours per year), whenever high demand dictates--not to be interpreted that the plant will necessarily operate on a continuous basis for up to two months per year and then shut down. Perhaps I was unclear in the description of the current and future estimated plant operation; for this I apologize.

Regardless, the Animas plant has been configured such that the all steam related generation and associated process water discharge has ceased completely as mentioned in the inspection report.

Thank you for allowing the opportunity to provide comments to the NPDES NM0000043 inspection and associated report conducted June 25, 2015.

Please contact me directly at (505) 599-8345, by e-mail at [adailey@fmtn.org](mailto:adailey@fmtn.org) if you have any questions or if any additional information is requested.

Sincerely,



Aaron Dailey, CHMM  
Environmental Scientist  
Farmington Electric Utility System

cc: Bruce Yurdin, NMED Surface Water Quality Bureau  
FEUS Environmental File