



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

NEW MEXICO ENVIRONMENT DEPARTMENT

Harold Runnels Building
1190 South St. Francis Drive (87505)
P.O. Box 5469, Santa Fe, NM 87502-5469
Phone (505) 827-0187 Fax (505) 827-0160
www.nmenv.state.nm.us



RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

Certificated Mail – Return Receipt Requested

October 17, 2014

Mr. Chris Olsen, Vice President, Generation
Public Service Company of New Mexico (PNM)
2401 Aztec NE MS Z1020
Albuquerque, NM 87107

Re: PNM Rio Bravo Generating Station, formerly Delta Person Generating Station; Minor Individual Permit; SIC 4911; NPDES Compliance Evaluation Inspection; NPDES NM0030376; September 17, 2014

Dear Mr. Olsen:

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:

Racquel Douglas
US Environmental Protection Agency, Region VI
Enforcement Branch (6EN-WM)
Fountain Place
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 Erin Trujillo at 505-827-0418 or at erin.trujillo@state.nm.us.

PNM Rio Bravo Generating Station - NM0030376

October 17, 2014

Page 2 of 2

Sincerely,

/s/Bruce J. 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
Racquel Douglas, USEPA (6EN-WM) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) e-mail
Brent Larsen and Tung Nguyen, USEPA (6WQ-PP) by e-mail
Bill Chavez, NMED District I by e-mail
John Hale, PNM Resources 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 3 0 3 7 6 11 12 1 4 0 9 1 7 17 18 C 19 S 20 2																					
Remarks																					
E L E C T R I C P O W E R G E N E R A T I O N																					
Inspection Work Days					Facility Evaluation Rating					BI	QA	-----Reserved-----									
67 69					70 2					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) Public Service Company of New Mexico (PNM), Rio Bravo Generating Station, formerly Delta Person Generating Station; 725 Electric Avenue SE, Albuquerque, New Mexico 87105. Bernalillo County.	Entry Time /Date ~0750 hours / 09/17/2014	Permit Effective Date March 1, 2010
	Exit Time/Date ~0940 hours / 09/17/2014	Permit Expiration Date February 28, 2015
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) -John Hale, P.E., Technical Project Manager, PNM Resources / 505-241-2014, cell 505-362-1129 -Richard Threet, Plant Manager, PNM / 505-241-4723 -Malcolm Long, Supervisor, PNM	Other Facility Data Outfall Latitude: 35.029125° Longitude: -106.643444°	
Name, Address of Responsible Official/Title/Phone and Fax Number Chris Olsen, Vice President, Generation, Public Service Company of New Mexico, 2401 Aztec NE MS Z1020, Albuquerque, NM 87107	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
SIC 4911		

Section C: Areas Evaluated During Inspection

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

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

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

- See attached report and further explanations.

Name(s) and Signature(s) of Inspector(s) Erin S. Trujillo /s/Erin S. Trujillo	Agency/Office/Telephone/Fax NMED/SWQB/505-827-0418	Date 10/17/2014
Signature of Management QA Reviewer Sarah Holcomb /s/Sarah Holcomb	Agency/Office/Phone and Fax Numbers NMED/SWQB/505-827-2798	Date 10/17/2014

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

 S M U NA (FURTHER EXPLANATION ATTACHED Yes)

DETAILS: **Ownership transfer letter dated 07/30/2014. NMED files contain PNM renewal application signed 8/27/2014. Facility name changed on the cover page of NPDES permit included in USEPA letter dated 08/28/2014.**

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE. **PNM name not on permit cover page** 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. **latitude / longitude incorrect** 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 Yes)

DETAILS: **Permittee had not applied to use NetDMR on the day of this CEI, but plans to report electronically.**

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. **DMRs were not due on day of CEI** 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. **Calibration results recorded as "OK," but not numeric results** 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. see above 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. **DMRs were not due** Y N NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.

 S M U NA (FURTHER EXPLANATION ATTACHED Yes)

DETAILS: **There are no treatment facilities. Back flow from collection tank (before flow meter) could allow an unmeasured discharge. Permittee representative indicated that collection tank system and operations would be evaluated.**

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. Y N NA
- STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. **written outfall sampling SOPs** Y N NA
- PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. 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 Yes).
 DETAILS: **No WET monitoring reported for 2013 or 2014 on the day of this CEI.**

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. **Previous findings** Y N NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. **Previous findings** Y N NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE. Y N NA
- a) SAMPLES REFRIGERATED DURING COMPOSITING. **Note: WET monitoring would require compositing** Y N NA
- b) PROPER PRESERVATION TECHNIQUES USED. **Example: pH preservation for Zinc not documented** Y N NA
- c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3. **Example: pH holding times** 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: **Flow meter certificate of conformance in NMED SWQB files provided to permittee on-site rep following CEI.**

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE **Georg Fischer Signet LLC, Signet Rotor-X Paddlewheel**
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. **Calibration due date 10/22/2014 per Certificate of Conformance** 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. **1.379 to 19.923 ft/s** Y N NA

SECTION F - LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED Yes)
 DETAILS: **Approved methods not documented for pH. Contract laboratory not inspected.**

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. not documented in written procedures provided % OF THE TIME. Y N NA
- 6. SPIKED SAMPLES ARE ANALYZED. laboratory 100 % OF THE TIME. Y N NA
- 7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME **Hall Environmental Analysis Laboratory** **Atkins Environmental Toxicology Lab**
 LAB ADDRESS **4901 Hawkins NE, Albuquerque, NM 87109** **888 W. Sam Houston Pkwy S Ste 110, Houston, TX 77042**
 PARAMETERS PERFORMED **BOD, COD, TOC, TSS, ammonia (as N), Zinc and Hardness** **WET report dated 09/05/2012**

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						

RECEIVING WATER OBSERVATIONS. **No flow (no discharge) to Outfall 001 during this CEI.**

SECTION H - SLUDGE DISPOSAL

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

DETAILS: **No sewage sludge**

- 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: not applicable (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

**Public Service Company of New Mexico
Rio Bravo Generating Station
Compliance Evaluation Inspection
NPDES Permit No. NM0030376
September 17, 2014**

Further Explanations

Introduction

On September 17, 2014, Erin Trujillo, accompanied by Sarah Holcomb, both of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the Public Service Company of New Mexico (PNM) owned and operated, Rio Bravo Generating Station, formerly Delta Person GP, LLC, Delta-Person Generating Station, 725 Electric Avenue SE, Albuquerque, New Mexico 87105 in Bernalillo County, New Mexico. The facility 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 NM0030376.

This permit authorizes discharges from Outfall 001 to an unnamed unlined tributary now identified in Segment 20.6.4.97 *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (NMAC)*, thence to Albuquerque Metropolitan Arroyo Flood Control Authority (AMAFCA) South Diversion Channel, thence to the Rio Grande in Segment 20.6.5.105 NMAC. NMED Use Attainability Analysis for Unclassified Non-Perennial Watercourses with NPDES Permitted Facilities dated June 2012 (USEPA technical approval dated January 30, 2013) is available at:

<http://www.nmenv.state.nm.us/swqb/documents/swqbdocs/Standards/UAA/UAA-UnclassifiedNon-PerennialReachesForNPDESPermits.pdf>.

NMED SWQB performs a certain number of CEIs each year for the U.S. Environmental Protection Agency (USEPA), Region VI. The purpose of this inspection is to provide the USEPA with information to evaluate the Permittee's compliance with the NPDES permit. This inspection report is based on information provided by the PNM representatives, observations made by the NMED inspector, and records and reports kept by the PNM and/or NMED.

Upon arrival at the facility at approximately 0750 hours on the day of this inspection, the inspector made introductions, presented credentials and explained the purpose of the inspection to John Hale, P.E., Technical Project Manager, PNM Resources; and Richard Threet, Plant Manager and Malcolm Long, Supervisor, PNM. The inspectors and PNM on-site representatives toured the facility. Following the tour, the inspector conducted an exit interview to discuss preliminary findings. The inspectors left the facility at approximately 0940 hours on the day of this inspection.

Treatment Scheme

PNM submitted an ownership transfer letter dated July 30, 2014. PNM's renewal application was signed August 27, 2014. This facility is a one-unit, simple cycle, natural gas-fired 132 megawatt (MW) electrical power generating station. It generated electric power by the combustion of natural gas. The facility is also equipped to operate on diesel fuel. The station generates electricity through direct combustion during periods of peak demand. Ambient air is drawn through an air filtration / evaporation intake structure. Well water stored in a holding tank is pumped through the filtration unit. The evaporative cooler functions by circulating groundwater (raw water) pumped from an on-site production well to an aboveground storage tank then through the cooler where the intake air directly contacts the circulating water and is cooled through evaporation of some of the water. The lower temperature air is denser and results in increased turbine output. In order to keep the concentration of dissolved solids within system design limits, a portion of the circulated water is periodically "blown down." This blow down water contains raw water in which dissolved solids have been concentrated through evaporation. The blow down water is discharged from the

evaporative cooler to an aboveground surge tank (collection tank), and then from the facility via Outfall 001. The evaporative cooler blowdown average flow is listed as 99,000 gallons per year. No additives (e.g., sulfuric acid and chlorine) are added to the blow down discharge as indicated on PNM’s renewal application.

This facility is described as a peaking and standby plant and, as such, operates infrequently and sporadically. Since the effective date of this permit, reported discharges occurred June 2010; June, July, August, and September of 2011; July and August of 2012; May, June, July and August of 2013; and August of 2013.

PNM on-site representatives indicated during this CEI and provided written procedures described that discharge monitoring reports (DMRs) will be submitted electronically thru USEPA NetDMR system. A subscriber agreement for NetDMR had not been obtained on the day of this CEI. DMRs for July, August and September 2014, due quarterly, were not due to be submitted by PNM on the day of this CEI.

Section A – Permit Verification – Overall Rating of “M = Marginal”

Permit Requirements for Permit Verification

Part III.D.9 (Standard Conditions, Other Information) of the permit states:

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.

Findings for Permit Verification

Inspectors discussed the raw water source and PNM’s reporting of “believe absent” on the renewal application for some pollutants with PNM on-site representatives during this CEI. NMED SWQB files contain groundwater data provided with DMRs. Raw groundwater data may not be representative of a discharge where solids may have been concentrated through evaporation. Effluent concentrations were previously included in USEPA reasonable potential calculations of previous permits.

PNM’s renewal application included data from sample collection on August 12, 2014. Problems with the sampling and analysis is discussed below in Section B, D and F.

The following appears to need update or clarification on the permit:

- PNM is not listed on the updated permit cover page transmitted in USEPA letter dated August 28, 2014.
- The sample type monitoring requirements for pH—indicated to be “grab (totalizer)”—in Part I.A.1 of the Permit appears to need update or clarification. Sample type for pH is typically a “grab” sample.
- The discharge location (latitude and longitude) on the PNM’s renewal application and on the cover page of the permit is approximately 1,200 feet south-southeast of the location of the outfall based on readily-available on-line mapping tools (see Figure 1 below). PNM renewal application signed August 27, 2014 figures show the outfall location correctly, but includes the incorrect latitude-longitude from the existing permit:

Permitted Outfall Location

	<u>Cover Page of Permit</u>
Latitude	35° 1' 34" N
Longitude	106° 38' 30" W

Approximate Outfall Location

Latitude	35° 1' 44.85" N (35.029125°)
Longitude	106° 38' 36.40" W (-106.643444°)

Figure 1 Outfall Location



Section B - Recordkeeping and Reporting Evaluation - Overall Rating of “M = Marginal”;
Section D - Self-Monitoring - Overall Rating of “U = Unsatisfactory”; and
Section F - Laboratory - Overall Rating of “U = Unsatisfactory”

Permit Requirements for Recordkeeping and Reporting, Self-Monitoring and Laboratory

Part I.A.1 (Limitations and Monitoring Requirements, Measurement Frequency 1/Day or 1/Week) of the Permit state:

PART I – REQUIREMENTS FOR NPDES PERMITS							
A. LIMITATIONS AND MONITORING REQUIREMENTS							
1. Outfalls 001							
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 from Outfall 001. Such discharges shall be limited and monitored by the permittee as specified below:							
EFFLUENT CHARACTERISTICS		DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
POLLUTANT	STORET CODE	Standard Units				MEASUREMENT FREQUENCY	SAMPLE TYPE
		MINIMUM	MAXIMUM				
pH	00400	6.6		9.0		1/Day	Grab (Totalizer)
EFFLUENT CHARACTERISTICS		DISCHARGE LIMITATIONS				MONITORING REQUIREMENTS	
POLLUTANT	STORET CODE	lbs/day, unless noted		mg/l, unless noted		MEASUREMENT FREQUENCY	SAMPLE TYPE
		30-Day Avg	Daily Max	30-Day Avg	Daily Max		
Flow	50050	Report MGD	Report MGD	***	***	Daily	Totalizing meter
Total Suspended Solids	00530	11	38	30	100	1/Week	Grab
Hardness, CaCO ₃		NA	NA	Report	Report	1/Week	Grab
Zinc	01092	0.38	0.38	1.0	1.0	1/Week	Grab
Total Residual Chlorine	50060	N/A	N/A	N/A	0.011 (*3)	1/Week	Instantaneous Grab (*1)

Part III.B.3a (Standard Conditions, Proper Operation and Maintenance) of the Permit states “*Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.*”

Part III.C.3 (Standard Conditions) of the Permit states “*The permittee shall retain records of all monitoring information, including all calibration and maintenance records....*” Part III.C.4 (Standard Conditions, Record Contents) of the Permit states:

Records of monitoring information shall include:

- a. The date, exact place, and time of sampling or measurements;*
- b. The individual(s) who performed the sampling or measurements;*
- c. The date(s) and time(s) analyses were performed;*
- d. The individual(s) who performed the analyses;*
- e. The analytical techniques or methods used; and*
- f. The results of such analyses.*

Part III.C.5 (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 permit 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.*
- c. An adequate analytical quality control program, including the analyses of sufficient standards, spikes and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.*

Part III.D.8 (Standard Conditions, Reporting, Other Noncompliance) of the Permit states “*The permittee shall report all instances of noncompliance not reported under Parts III.D.4 and D.7 and Part I.B (for industrial permits only) at the time monitoring reports are submitted. The reports shall contain the information listed at Part III.D.7.*” Part III.D.7 of the Permit states “*...The report shall contain the following information: (1) A description of the noncompliance and its cause; (2) The period of noncompliance including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and, (3) Steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.*”

Findings for Recordkeeping and Reporting, Self-Monitoring and Laboratory

Recordkeeping for pH monitoring did not include the analytical method and results of calibrations. It was not documented that the calibration of the pH instrument met procedures required in an USEPA approved method in 40 CFR 136.3.

Notes: On-site pH calibration form (Photo 1) show calibration results for pH were recorded as “OK”. But, no numeric results of readings or temperature of calibration or standardization before sample analysis were recorded. On August 12, 2014, the on-site pH calibration form shows the use of two (7 and 10), not three buffers.

An approved method for pH monitoring listed in 40 CFR 136.3, Standard Methods 4500-H+ approved by Standard Methods Committee in 2000, provides a procedure for instrument calibration that includes three buffers, recording temperature measurement, setting and adjusting instrument, meter response within 0.1 unit for the pH of the third buffer, trouble shooting, and standardization. The purpose of standardization is to adjust the response of the glass electrode to the instrument.

Recordkeeping for pH and TRC monitoring did not include both sampling time and analytical time; therefore, it was not documented that the analyses met the required holding time for pH or TRC, in this case “analyze within 15 minutes,” required in USEPA approved methods (40 CFR 136.3 Table II).

Notes: PNM’s renewal application indicates that blow down water for pH and TRC were 7.72 s.u. and 0.14 mg/L, respectively. On-site log for August 12, 2014 also indicate that the monitoring results for pH and TRC were 7.72 s.u. and 0.14 mg/L, respectively. However, only one time was recorded.

Reviewed recordkeeping did not document that sample preservation requirements (e.g., pH adjustment for zinc, COD and ammonia monitoring) in USEPA approved methods in 40 CFR 136.3 Table II were met.

Notes: Undated written procedures labeled “NPDES Evaporative Outfall 001 Sampling Procedures” indicated that a sample kit will be need to be ordered and picked up at a contract laboratory. Required containers, preservation techniques and holding times were not described in written procedures provided during this CEI that also included PNM “Rio Bravo Generating Station, Environmental Procedures, NPDES Permit Monitoring and Reporting Procedures” dated June 3, 2014.

Zinc is a metal that requires the addition of HNO₃ < 2 s.u. or at least 24 hours prior to analysis in Table II of 40 CFR 136.3. Completed chain of custody record for a sample collected on August 12, 2014 for BOD, COD, TOC, TSS, ammonia (as N) and total zinc provided in PNM’s renewal application does not include preservation type. Completed commercial laboratory Sample Log-In Check List form indicate that no preservation was added to bottles. Addition of preservation at the laboratory was not recorded in the commercial laboratory report for the Zinc sample. Additional information from the laboratory may be available.

Determination and documentation of the source or reason for high TRC monitoring results (e.g, analytical method interferences, improper sampling and analysis methods, exceeding holding times, instrument’s reporting units, etc.) and/or additional monitoring and reporting appears needed.

Notes: TRC monitoring results (0.14 mg/L) reported on PNM’s renewal application exceeded both the TRC effluent limitation of 0.011 mg/L in Part I.A.1 of the Permit and the minimum quantification level of 33 µg/L (0.033 mg/L) in Appendix A of Part II. Part I.A.1 Footnote *1 states “*The effluent limitation for TRC is the instantaneous maximum grab sample taken during periods of chlorine use and can not be averaged for reporting purposes. Regulations at 40 CFR Part 136 define “instantaneous grab” as analyzed within 15 minutes of collection. Samples shall be representative of period of chlorination.*” No chlorine or chlorination is added to the blow down discharge according to PNM on-site representatives and PNM’s renewal application

Written procedures for measurements, monitoring, and reporting appear to need review, additional information, clarification or update. In addition to incorporating analytical methods, calibrations, holding times, and preservation (discussed above), other examples include:

- Written procedures provided for review did not describe procedures or appropriate frequency for duplicates and/or spikes. For example, EPA’s NPDES Inspection Manual states “*10 percent of the samples should be duplicated.*” In this example, a duplicate sample would be collected at least every tenth sample for each parameter.
- Undated written procedure incorrectly refers to “free chlorine reagents.” Part I.A of the Permit requires monitoring for total residual chlorine.

Note: PNM on-site representatives described that total chlorine reagents were used and total chlorine reagents were available on site.

- PNM written procedures dated June 3, 2014 state “*Meter to be calibrated prior to use using appropriate procedure.*” Nalco Analysis Procedures were on-site. A copy of a pH method approved

in 40 CFR 136.3, that also includes additional calibration procedures, was not included in PNM written procedures provided during this CEI.

- PNM procedures dated June 3, 2014 state non-compliance oral reports are to be made “within 24 hours” and did not list NMED. Part II.F of the permit states “Any non-compliance which may endanger health or the environment shall also be orally reported to EPA...and the NMED Surface Water Quality, as soon as possible, but within 12 hours from the time the permittee becomes aware of the circumstances.”

Note: Phone numbers listed in the Permit are for NMED’s statewide spill reporting, not NMED Surface Water Quality Bureau as indicated in the permit.

Status of Previous Findings

The following findings were discussed in the previous June 18, 2012 CEI report for the previous owner/permittee Delta-Person GP, LLC:

- Part I.A.1 (Limitations and Monitoring Requirements, include a list of pollutants to be monitored at 1st Discharge and the results were to be reported. Part I.A.1 Footnote 4 states “*Monitoring and reporting requirements begin on the effective date of this permit. Samples should be taken upon first discharge.*”

Monitoring and reporting at the time of the 1st discharge for pollutants listed in Part I.A.1 of the permit was not documented. Based on a review of NMED SWQB’s files, monitoring for the list of pollutants after 1st Discharge has not been conducted / is not documented.

- Part I.A.1 (Limitations and Monitoring Requirements, requires composite samples for 48-Hour Static Renewal WET testing using *Daphnia pulex* species at a frequency of 1/year. Footnote 2 of Part I.A of the Permit states, “*Monitoring and reporting requirements begin on the effective date of this permit. Samples should be taken in upon first discharge. See PART II, Whole Effluent Toxicity testing requirements for additional WET monitoring and reporting conditions.*”

Based on a review of NMED SWQB’s files and PNM’s renewal application, bio-monitoring was conducted in 2012, but the results do not appear to have been reported on DMRs. No WET testing appears to have been conducted / reported in 2013. WET testing was conducted in 2014 according to the PNM representative.

Section C – Operations and Maintenance – Overall Rating of “S = Satisfactory”

Part III.B.3a (Standard Conditions, Proper Operation and Maintenance) of the Permit states:

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee 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 this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.

There are no treatment facilities. PNM representatives indicated operations and maintenance procedures were under review. Written procedures may need updating.

Back flow of collection tank contents, installed up flow from the flow meter, could allow a discharge that is not monitored or measured by the flow meter (see Photo 2) as required by the Permit. On-site representatives indicated that the collection tank system and operations were under review by PNM. Alternative systems and/or written procedures for the system to prevent discharges that are not measured or monitored may be needed.

**NMED/SWQB
Official Photograph Log
Photo # 1**

Photographer: Erin S. Trujillo	Date: 09/17/2014	Time: 0847 hours
City/County: Albuquerque / Bernalillo		State: New Mexico
Location: PNM Rio Bravo Generating Station		
Subject: pH Calibration records provide name, date, time, calibration type (buffer) and qualitative results only. Entry for 8/12/14 only shows two buffers (7 and 10).		

Delta Person pH Calibration records

Name	Date	Time	Sample Location	Cal. Type	Result
Dan Western	7-31-12	1:29 PM	Lab	4-7-10	OK
Dan Western	8-28-12	10:00	Lab	4-7-10	OK
Dan Western	12-6-12	08:00	Lab	4-7-10	OK
Dan Western	5-30-13	12:15	Lab	4-7-10	OK
Dan Western	6-27-13	13:05	Lab	4-7-10	OK
Dan Western	7-31-13	13:46	Lab	4-7-10	OK
Gene Lemusoux	8-12-14	16:47	Lab	7-10	OK
Malcolm Long	7/10/14	13:50	Lab	4/7/10	OK
Gene Lemusoux	9/11/14	16:54	Lab	4-7-10	OK
M Long	9/14/14	11:00	Lab	4-7-10	OK
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____

09/17/2014 08:47

NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Erin S. Trujillo

Date: 09/17/2014

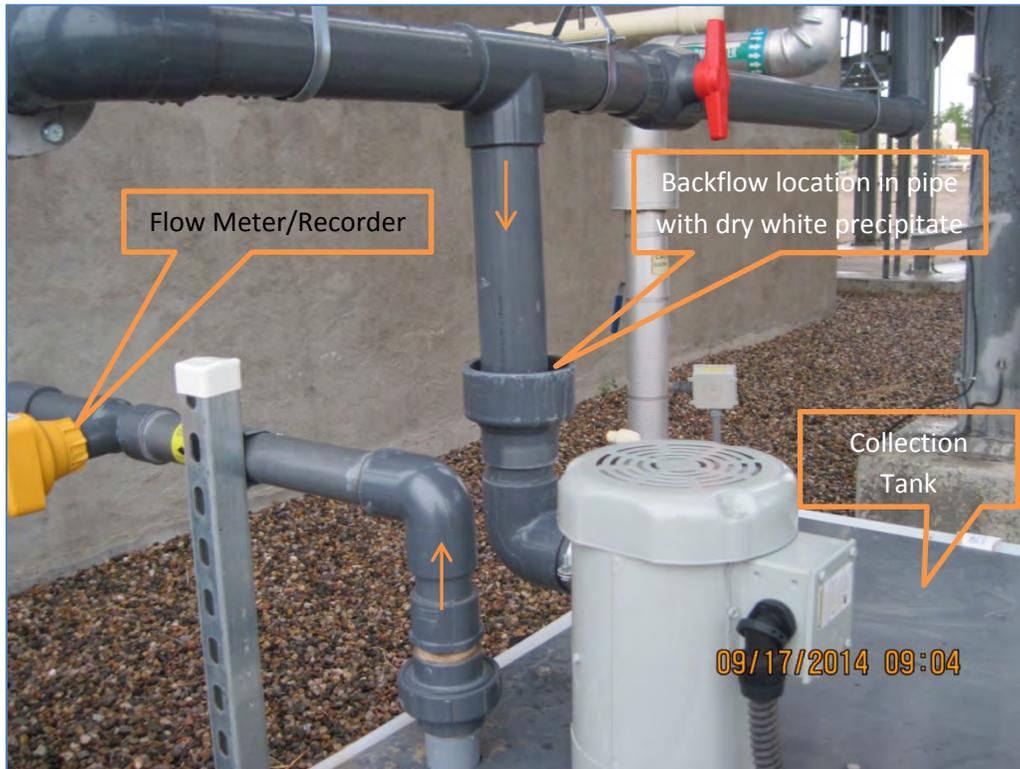
Time: 0904 hours

City/County: Albuquerque / Bernalillo

State: New Mexico

Location: PNM Rio Bravo Generating Station

Subject: Arrows point in direction of flow into and out of collection tank except for backflow location which is called out. White precipitate below backflow location was observed. No precipitate was observed on the ground beneath the pipe and backflow location on the day of this CEL.



Permittee Representative Response dated 11/07/2014

7012 2210 0001 8989 6584

2401 Aztec NE – Z100
Albuquerque, NM 87107
P 505.241.2014
F 505.241.2384
PNMResources.com



November 7, 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Racquel Douglas
U.S. EPA, Region 6
Enforcement Branch (6EN-WM)
Fountain Place
1445 Ross Ave.
Dallas, TX 75202-2733

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

**RE: Public Service Company of New Mexico Rio Bravo Generating Station,
NM0030376 – Response to NPDES Compliance Evaluation Inspection
Report**

Dear Ms. Douglas and Mr. Yurdin:

Public Service Company of New Mexico (PNM) offers the following comments on the Compliance Evaluation Inspection (CEI) Report dated October 17, 2014, as prepared by the New Mexico Environment Department (NMED).

If you have any questions, please contact me at (505) 241-2014.

Sincerely,

A handwritten signature in black ink that reads "John Hale".

John Hale, P.E.
Technical Project Manager

Enclosure

cc: Rick Threet – PNM, via email
Erin Trujillo, NMED-SWQB, via email

Treatment Scheme

As noted in the CEI report, PNM indicated that future DMRs will be submitted electronically through the EPA's NetDMR system. Please be aware that the third quarter 2014 DMRs were submitted via the NetDMR system.

Section A – Permit Verification

Response to Findings

- In general, the evaporative cooler blowdown was analyzed for the same parameters that the previous facility owner, Delta-Person LP, had done. Since there have been no changes to the facility water supply, treatment methods, or discharge processes since the last permit application was submitted, PNM believes the selected analyte list was appropriate.
- As NMED noted, PNM is listed in the letter from the EPA acknowledging the facility name change and the change of ownership. However, only the new facility name, Rio Bravo Generating Station, is listed on the permit cover page.

This omission appears to be to be an oversight on the part of EPA rather than PNM.

- PNM concurs with NMED that the pH sample type on the permit should be listed as a “grab” sample. PNM is unsure of what EPA meant by using the term “Grab (Totalizer)”, but suspects that it is intended to show that the pH sample should be collected at a sample point on the discharge line after the totalizer meter. Consequently, PNM has been collecting grab samples for pH analysis at this location and will continue to do so.
- PNM concurs with NMED's finding that the actual discharge location (Outfall 001) as shown in the permit renewal application figures is not consistent with the coordinates listed in the current permit application and previous permit. PNM will submit the correct location information to EPA.

Section B - Recordkeeping and Reporting Evaluation

Section D – Self-Monitoring

Section F – Laboratory

Response to Findings

- PNM concurs with NMED's finding that recordkeeping for pH monitoring and TRC did not include all the relevant information. PNM will make the necessary changes to the calibration and recordkeeping procedures to ensure that they meet the current requirements.

- Regarding NMED's comments on sample preservation requirements for zinc, COD, and ammonia analysis as conducted for the permit renewal application, PNM informed the contract laboratory that all samples were to be analyzed using the appropriate 40 CFR 136.3 methods. PNM believes that the laboratory analyzed the samples using the appropriate methods; however, PNM will request that the laboratory provide the requested information for future analyses.
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November 7, 2014

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Section D – Self-Monitoring

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