



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

1595 Wynkoop Street

DENVER, CO 80202

Phone 800-227-8917

<http://www.epa.gov/region08>

Ref: 8WD-CWW

SENT VIA EMAIL
ELECTRONIC READ RECEIPT REQUESTED

Barbara A. Walz

Senior VP, Policy and Compliance, Chief Compliance Officer

Tri-State Generation and Transmission Association, Inc. – JM Shafer Generating Station

P.O. Box 33695

Denver, Colorado 80233-0695

Re: EPA Pretreatment Notification of Categorical Industrial User Requirements, ICIS Number:
CO-PF00107

Dear Ms. Walz:

On February 19, 2020, the U.S. Environmental Protection Agency (EPA) conducted an inspection of JM Shafer Generating Station (JM Shafer, facility). Based on information gathered during the inspection and information submitted by JM Shafer in the October 24, 2019 application for the Notification of Discharge Requirements, JM Shafer is subject to the Steam Electric Point Source Category Pretreatment Standards at 40 CFR Part 423. JM Shafer is an industrial user of the City of Fort Lupton's publicly owned treatment works (POTW), which does not have a Pretreatment Program approved by the EPA. Therefore, the EPA directly oversees compliance of industrial users that discharge to the City of Fort Lupton POTW and is partnering with the City of Fort Lupton POTW to ensure the POTW is protected from potential impacts of pollutants discharged from non-domestic sources.

Enclosed is information regarding JM Shafer's discharge requirements as a categorical industrial user, subject to the Steam Electric Point Source Category Pretreatment Standards at 40 CFR Part 423 (Enclosure 1, Notification of Discharge Requirements). This enclosure sets forth specific effluent limits, monitoring frequencies and reporting requirements the EPA has established in accordance with 40 CFR Part 403 in addition to applicable Categorical Pretreatment Standards and Pretreatment Requirements. Enclosure 2 is the associated fact sheet, which provides a rationale for the conditions set forth in Enclosure 1.

The Pretreatment Regulations at 40 CFR 403.12(j) require JM Shafer to promptly notify the EPA and POTW in advance of any substantial change in the volume or character of pollutants in its discharge that may affect the regulatory requirements contained in this notification. These substantial changes could include changes to the operations, wastestream generation, and/or wastewater management that may affect the status of JM Shafer under the Pretreatment Regulations or the calculation of alternative limits due to dilution from non-regulated wastestreams.

Nothing contained in this notification package or in any EPA regulations restrict State or local agencies from imposing additional requirements in accordance with applicable laws, including requirements which are more stringent than those imposed by the EPA.

If you have any questions about the enclosed information, please contact Al Garcia at 303-312-6382 or garcia.al@epa.gov.

Sincerely,

Darcy O'Connor, Director
Water Division

Enclosures:

1. Notification of Discharge Requirements under the Steam Electric Point Source Category and the General Pretreatment Regulations
2. JM Shafer Fact Sheet

cc:

Darlene Crosby, Senior Environmental Planner, Tri-State Generation and Transmission, Inc.
Jon Mays, Fort Lupton Project Manager, Jacobs Engineering
Jon Wallace, Pretreatment Coordinator, Colorado Department of Public Health and Environment