

STATE OF NEW MEXICO

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October 19, 1983

TO: FILE

FROM: *jr* TRENT H. THOMAS, ENVIRONMENTAL SCIENTIST, HAZARDOUS
WASTE SECTION

RE: REPORTED RELEASE AT PNM, PERSON GENERATING STATION

On October 13, 1983, EID Hazardous Waste Section was notified of a possible release of material at a previously unidentified storage unit, a Person Generating Station. This storage unit had received degreasing washes from various machinery and contained TCE. EPA NRC was also notified.

Mr. H.L. Plum indicated that the integrity of the unit (tank?, pipe?,) was no longer secure and that the material may have been released.

The following day, October 14, 1983, Mr. Plum again called seeking guidance on clean-up criteria if in fact their planned analysis showed a release of material to the environment. I informed Mr. Plum that I knew of no formalized guidelines, either state or federal, and that perhaps he should contact EPA Regional Response Center-Dallas for possible references. EPA informed Mr. Plum that they usually went along with recommendations from their state.

During the course of the day, I spoke with Anthony Drypolcher, Richard Perkins and Dennis McQuillan as to possible suggestions on clean-up criteria. It was generally agreed that if the material could be shown not to have entered ground water, the WQCC standards, for those identified constituents, might provide appropriate levels for decontamination of remaining residue. It was also agreed that EID collect samples whenever clean-up was thought to be sufficient by PNM in order to determine the states needs for possible clean-up.

On Monday morning, October 17, 1983, I contacted Mr. Plum and informed him that I would be in the Albuquerque area and would like to visit the site. During this visit Mr. Plum and PNM consultants explained their

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proposed plans for clean-up of the area and for disposal of the contaminated material. In general, their proposal seemed sufficient to remedy the problem.

However, after this preliminary inspection and a review of the files, it became evident that the proposed clean-up might have to follow established procedural guidelines pursuant to the New Mexico Hazardous Waste Management Regulations. The main concern being that this might not be an emergency situation, but might constitute on-site disposal and require an approved closure plan for planned removal.

On October 18, 1983, at approximately 4:30pm, I informed Mr. Richard Jordan of PNM that no excavation or removal of material was to begin until the status of the site had been clarified.

In order to accomplish this, it was agreed by EID staff that a compliance inspection be performed the following day to begin the formal process.

clm

NARRATIVE
PUBLIC SERVICE NM-PERSON STATION
EPA ID NMT360010342
INSPECTION DATE -- October 19, 1983

NARRATIVE #1

F001 - Approximately one drum of Dow Clean E-C, a halogenated solvent consisting of 1,1,1, trichloro-ethane and trichloro-elthylene is used yearly as a degreaser.

NARRATIVE #2

Ignitability - Approximately one drum of stoddard solvent and one drum of kerosene are being used yearly for degreasing. The flash points for these products are such that the waste(s) generated may meet the characteristic(s) for ignitability prior to entering the storage unit.

NARRATIVE #3

50-7000 GPM of water is discharged to "Schwartzan Pond" which is located west of the facility. This waste stream consists of water used in the cooling towers, compressors and demineralizers and is monitored for pH flow. After reaching the pond, the water is used for irrigation.

A small laboratory used to perform limited analysis disposes of the waste generated into a septic tank connected to a drainfield.

Waste lube oils and crankcase are generated during maintenance on equipment.

NARRATIVE #4

The wastes identified in narrative #1,#2, and the oils in narrative #3 are picked-up for recycling approximately one each year. The last shipment off-site was almost three weeks ago. Lubbock Oil operating out of Lubbock, Texas, picks-up and transports the waste for recycling. There were no records or manifests available for review.

NARRATIVE #5

The wastes identified in narrative #4 were being stored on-site in a storage unit which for the purpose of this inspection was inspected as a tank. This tank is an iron pipe, 42 inches in diameter and 9 feet 7 inches in height placed vertically in the ground with a plate covering the opening. When PNM officials became aware of the tanks existence in early October, they discontinued its use and have since determined that the tank did not have a bottom. With this determination, PNM officials instituted appropriate notification procedures. See attachment #1. See attachment #2 for drawing of storage area.

NARRATIVE #6

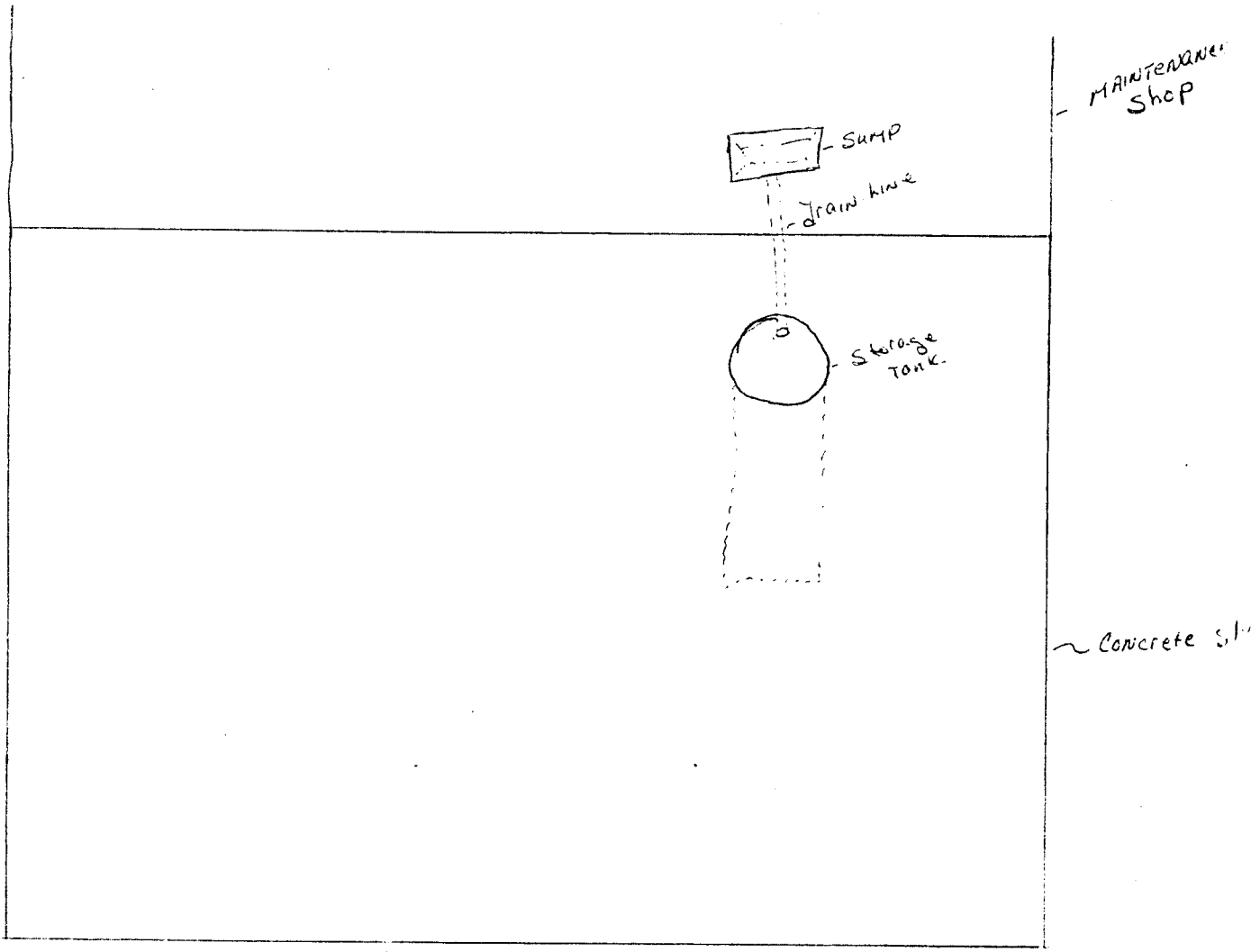
In that a discharge may have occurred because the tank did not have a bottom, the TSD Facilities checklist and tanks checklist were completed.

NARRATIVE #7

This facility requested an EPA ID number as a precautionary measure should the regulations be changed or this facility exceeds the limit for a small quantity generator. See attachment #3.

NARRATIVE #8

Inspections are being performed pursuant to the SPCC Plan and the PCB Plan and these inspections are entered into an inspection log.



Canopy over the concrete slab.

Rewrite of notes taken during inspection of PNM - Person
Station facility on 19-October 1983.

In Attendance -

George Bingham - PNM Regulatory Coordinator -

Jody Plum - PNM Regulatory Coordinator -

Jerry Pittman - PNM Plant Manager

John Fritzes - PNM - Employee

changes obtained on "Notification of Hazardous Waste Activity"
form. This notification filed to obtain EPA ID number -
however form statement indicate small quantity generator
status.

Subpart C. Wastes

FOO1, Trade Name Dow Clean E-C, halogenated solvent
containing 1,1,1, Trichloroethane, & Trichloroethylene.

used in degreasing operation -

Kerosene, standard solvent also used in degreasing.

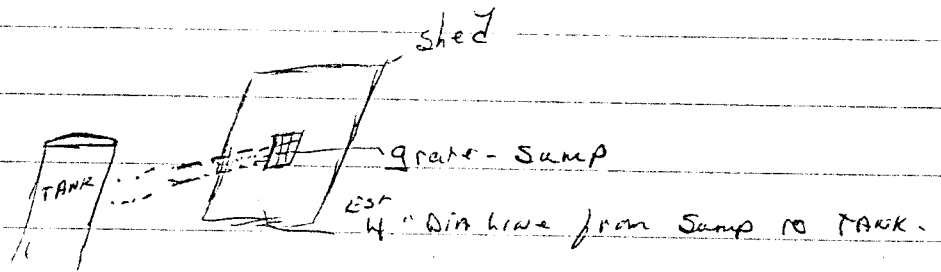
Est. 55 gallon drum of each per year.

Enter a sump then drains into storage tank where
held for recycling - storage tank 9' 7" deep - 42" dia.

TANK

TANK has iron sides - no bottom - gravel then blow
sand. - installed 1976 or 1977. Jody first became
aware Oct 3, 1983.

Deemed TSD checklist N/A because they do not feel they are TSD



Combustion - Tet
May have been
used from 70
to 80.

March 2, 1982 - Mike & Stuyll - inspected - This facility &
Reeves. / letter from Scott - Nov 7-30-82 - no Oils noted

^{small} Small laboratory at Parsons → sink oil/grease analysis, pH -
sophic tank -

ASK - about status of tank going to re-use

ASK. 1,1,1 Trichloroethane & Trichloroethylene - contained
TCA TCE
in Dow-Clean E.C.

Address -

Same thing Reeves & Stuyll - EPA Also
looked at this one - no problems sealed.

SPCC being revised. to include water
daily inspections on SPCC
Berms tanks, valves, pipelines.