



PUBLIC SERVICE COMPANY OF NEW MEXICO

ALVARADO SQUARE ALBUQUERQUE, NEW MEXICO 87158



July 23, 1991

Certified Mail
Return Receipt Requested

Dr. Bruce Swanton
New Mexico Environment Department
Hazardous Waste Program
1190 St. Francis Drive
Post Office Box 26110
Santa Fe, NM 87502

Dear Dr. Swanton:

Subject: Disposal of Monitor Well Purge
Water Into Albuquerque's Publicly
Owned Treatment Works (POTW),
Person Generating Station,
NMT 360010342

This letter is provided pursuant to our telephone conversation of July 19, 1991. It is intended to document our discussion and the consensus reached on the approved method for disposal of contaminated groundwater generated during the purge process for groundwater sampling at Person Generating Station.

Currently, approximately 60 gallons of purge water is collected during each quarterly sampling event. The water is accumulated and stored in sealed containers pending ultimate disposal in the City of Albuquerque's POTW. Periodically, a private septic waste hauler is employed to transfer the water from the containers to an entry point into the POTW. The waste is manifested using a City of Albuquerque Disposal Trip Manifest.

In our telephone conversation we discussed whether or not this disposal method is regulatorily appropriate in light of the fact that the purge water may be considered a hazardous waste under the EPA Hazardous Waste Regulations. It is my understanding that you felt this issue to be less important, or at least secondary to the question of: Is the POTW permitted to accept a hazardous waste? You pointed out that there are exclusions from the hazardous waste regulations for POTW's which discharge treated wastewater under an NPDES permit. (You cited 40 CFR 265.1.c(3).) You also indicated that it was important that the POTW be aware of the type of waste they are accepting and that they have given approval for that acceptance.

July 23, 1991

Our current understanding mirrors the approach we have taken to date. Enclosed with this letter are copies of the most recent set of correspondence between PNM and the City of Albuquerque. The set includes our request to dispose of the water, their approval reply, and a copy of the manifest showing receipt of the water.

It is important to note that the City advised us in their approval letter that the Albuquerque City Council is currently in the process of modifying several sections of the Sewer Use and Wastewater Control Ordinance. Those modifications may have a significant impact upon future requests for disposal approval.

Until such time we will continue to dispose of our purge water through the POTW in the manner described above, with the understanding that the New Mexico Environment Department Hazardous Waste Program and the City of Albuquerque Wastewater Utility Division are both in agreement with those procedures.

Sincerely,



Ron D. Johnson
Sr. Environmental Scientist

RDJ:krl

Enclosures: PNM Letter, June 5, 1991, (Johnson to Hogrefe),
Request to Discharge and Data Submittal
City of Albuquerque Letter, June 12, 1991,
(Hogrefe to Johnson), Approval to Discharge
City of Albuquerque Letter, July 16, 1991,
(Hogrefe to Johnson), Return of Manifest



PUBLIC SERVICE COMPANY OF NEW MEXICO

ALVARADO SQUARE ALBUQUERQUE, NEW MEXICO 87158

June 05, 1991

Mr. Robert Hogrefe
Industrial Waste Engineer
Pretreatment Section
4201 Second Street, SW
Albuquerque, NM 87105

Dear Mr. Hogrefe:

Subject: Analytical Results, Person Generating
Station Ground Water, October 1990
Through April 1991

Per our telephone conversation of May 10, 1991, I have enclosed copies of analyses for ground water sampled at Public Service Company of New Mexico's (PNM) Person Generating Station located at Rio Bravo and Broadway. We currently have on hand approximately 150 gallons of monitoring well purge water which we would like to dispose at the City of Albuquerque's Southside Water Reclamation Plant as per our existing agreement (reference July 19, 1990 letter from Bob Hogrefe to Metric Corporation).

The enclosed analytical reports represent analyses conducted at Person Station in October 1990, January 1991, and April 1991. In October 1990 and January 1991, only EPA Method 8240/624 scans (volatile organics) were performed on the ground water. In April 1991, full 40 CFR 264 Appendix IX scans were performed and thus represent a more thorough analytical record. The Appendix IX scans confirm, however, that the only organic compounds present in the ground water are limited to those detectable with the EPA 8240/624 method.

I will contact you in a few days to confirm that we may proceed with contacting a waste hauler for delivery. If you have any questions, please call me at 848-2998.

Sincerely,

Ron D. Johnson
Sr. Environmental Scientist

RDJ:krl

Enclosures: ATI Report Nos. 011515, 101769, 104851



City of Albuquerque

P.O. BOX 1293 ALBUQUERQUE, NEW MEXICO 87103

June 12, 1991

Mr. Ron D. Johnson, Senior Environmental Scientist
Public Service Co. of New Mexico
Alvarado Square
Albuquerque, New Mexico 87158

RE: REQUEST TO DISCHARGE - PERSON GENERATING STATION GROUNDWATER MONITORING
WELLS PURGE WATER

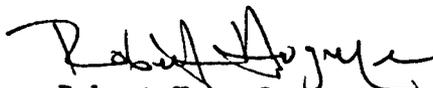
Dear Mr. Johnson:

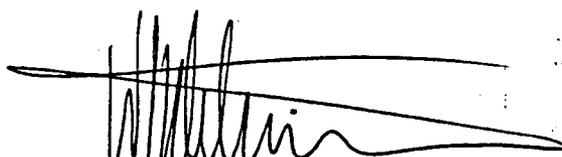
This letter is in response to yours of June 5, 1991, requesting permission to discharge 150 gallons of monitoring well purge water. We appreciate receiving the detailed analytical reports for the samples taken during the months of October 1990, January 1991, and April 1991. The results continue to indicate very low amounts of measurable volatile organic compounds in the purge waters.

Consistent with our earlier determinations, your discharge is approved to the City's sanitary sewer system via truck hauling to the Osuna Septage Disposal Facility. We specifically will not allow the discharge to be taken to the City's Southside Water Reclamation Plant. Please verify with your contracted disposal company that proper trip manifest forms are processed. Thank you for your cooperation.

Please be advised that the City is in the process of modifying several sections of the Sewer Use and Wastewater Control Ordinance. In particular, Section 8-9-3 E. controls discharge of ground water into the sanitary sewer system. The final decision of the City Council in modifying this section could have a significant impact upon future requests to discharge groundwater to the sanitary sewer system. In view of this fact, each such request will be considered independently and no overall acceptance is implied in this, or any other, letter of permission to discharge groundwater. Please contact the Pretreatment Unit at (505) 873-6200 with any questions you may have.

Sincerely,


Robert Hogrefe
Industrial Waste Engineer
City of Albuquerque


W.J. Westmoreland
Industrial Waste Engineer
City of Albuquerque

RH:BW:smv/WPPRE#1463

xc: Gene Leyendecker, Chief Environ. Engineer, Wastewater Utility Division
/file



City of Albuquerque

P.O. BOX 1293 ALBUQUERQUE, NEW MEXICO 87103

July 16, 1991

Mr. Ron D. Johnson, Senior Environmental Scientist
Public Service Co. of New Mexico
Alvarado Square
Albuquerque, New Mexico 87158

RE: PERSON GENERATING STATION GROUNDWATER MONITORING WELLS PURGE WATER,
DISCHARGE MANIFEST OF JUNE 21, 1991

Dear Mr. Johnson:

This will verify and transmit a copy of the City's receipt copy of the discharge manifest form #39243 for the above referenced discharge. Thank you for your cooperation.

Sincerely,

Robert H. Hogrefe
Industrial Waste Engineer

xc:

PNM

file