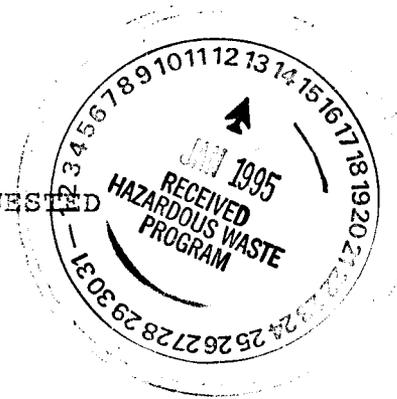


CERTIFIED MAIL - RETURN RECEIPT REQUESTED



January 15, 1995



STATE OF NEW MEXICO ENVIRONMENT DEPARTMENT

Jeff Sterba, Senior Vice President  
Power Supply Resources  
Public Service Company of New Mexico  
Alvarado Square  
Albuquerque, NM 87158

RE: Discharge Plan Approval, Person Station, DP-1006

Dear Mr. Sterba:

Pursuant to Water Quality Control Commission (WQCC) Reg. 3-109, the discharge plan application for DP-1006, submitted by Jerry Godwin for the discharge of 288,000 gallons per day of treated ground water from the Person Generating Station is hereby approved. The facility is located in the City of Albuquerque's South Valley in Section 4, T9N, R3E, Bernalillo County. In approving this discharge plan, the New Mexico Environment Department (NMED) has determined that the requirements of WQCC Reg. 3-109.C have been met.

The approved Person Generating Station treatment and disposal system is briefly described as follows:

Ground water below the Person Station contaminated with 1,1,2,2 Tetrachloroethylene (PCE), 1,1 Dichloroethylene (1,1-DCE), and 1,1,1 Trichloroethane (1,1,1-TCA) will be recovered and treated through an air stripper and thence through a liquid-phase carbon absorption system to reduce each of the above VOC's to concentration levels not to exceed 5 parts per billion. Treated water will be pumped via pipeline to the University of New Mexico's South Golf Course and discharged to two synthetically-lined irrigation storage lagoons located on the golf course. Treated water from PNM's Person Station will constitute between 5 and 10 per cent of the water stored in the lagoons. Stored water will be applied to the golf course by spray irrigation.

Gary Johnson  
Governor

Mark Weldler  
Secretary

.....  
Harold Runnels Building  
1190 St. Francis Drive  
P.O. Box 26110  
Santa Fe, NM 87502  
(505) 827-2850  
FAX (505) 827-2836



The approved discharge plan consists of the materials and letters submitted by PNM and Metric Corporation dated June 13, September 14, October 26, and November 30, 1994. The

Jeff Sterba  
DP-1006  
January 15, 1995  
Page 2

discharge shall be managed in accordance with the approved plan and is subject to the conditions listed below.

However, approval of this discharge plan does not relieve you of your responsibility to comply with any other applicable federal, state and/or local laws and regulations, such as zoning requirements and nuisance ordinances.

#### **CONDITIONS FOR APPROVAL**

This discharge plan approval is subject to the following conditions for the following reasons:

1. PNM shall monitor the influent and effluent daily for the VOC's listed above using EPA methods 601/8010 for the first week after remediation commences, thence weekly for four weeks, and then monthly thereafter. Beginning with the initial monthly sampling, and monthly thereafter, PNM shall also sample the two irrigation lagoons at the UNM golf course and analyze for the above VOC's. Monthly reports shall be submitted to the Ground Water Section quarterly by February 15, May 15, August 15, and November 15 of each year. PNM shall copy monitor reports to: Terri Davis, NMED Hazardous & Radioactive Materials Bureau.

The reason for this condition is to comply with § 3-109.C.3.c.(2) and 3-107 of the WQCC regulations.

2. PNM shall obtain a 24 hour composite sample of the effluent during the first week of discharging and analyze the sample for Manganese, Iron, Sulfate, Chloride, Nitrate as nitrogen, and TDS. If any of the above parameters exceed WQCC standards, PNM shall cease discharging until the treatment system is modified such that the parameters exceeding WQCC standards are treated to below WQCC standards.

The reason for this condition is to comply with WQCC regulation 3-103.

#### **SPECIFIC REQUIREMENTS**

The terms and conditions of this approval contain specific requirements which are summarized below.

1. PNM will treat up to 288,000 gallons per day of VOC contaminated ground water from below their Person

Generating Station through an air stripper and liquid phase carbon absorption system.

2. PNM will pump treated ground water to the UNM South Golf Course for spray irrigation of approximately 100 acres as specified in PNM's "PIPELINE CONSTRUCTION AND WATER SUPPLY AGREEMENT" with UNM dated October 27, 1994.
3. PNM will monitor and report as follows:
  - a) Record monthly effluent volumes discharged to the golf course using a totalizing flow meter. Records will be submitted with the quarterly reports.
  - b) Sample and report as outlined in conditions # 1 and 2 under CONDITIONS FOR APPROVAL above.
4. If any portion of the treatment and/or delivery system fails to decrease contaminant concentrations to 5 parts per billion or less and/or deliver effluent to the golf course, PNM will shut down the recovery wells and not reactivate until the problems are corrected and contaminant levels are below requirements.
5. After cessation of operations PNM will close the facility as described in section 19 in their discharge plan application.

#### GENERAL DISCHARGE PLAN REQUIREMENTS

In addition to any other requirements provided by law, approval of discharge plan, DP-1006, is subject to the following general requirements:

#### Monitoring and Reporting

Monitoring and reporting shall be as specified in the discharge plan and supplements thereto. These requirements are summarized on the attached sheet(s). Any inadvertent omissions from this summary of a discharge plan monitoring or reporting requirement shall not relieve you of responsibility for compliance with that requirement.

#### Record Keeping

1. The discharger shall maintain at the facility, a written

Jeff Sterba  
DP-1006  
January 15, 1995  
Page 4

record of ground water and waste water quality analyses.

The following information shall be recorded and shall be made available to the NMED upon request.

- a. The dates, exact place and times of sampling or field measurements.
  - b. The name and job title of the individuals who performed the sampling or measurements.
  - c. The dates the analyses were performed.
  - d. The name and job title of the individuals who performed the analyses.
  - e. The analytical techniques or methods used.
  - f. The results of such analyses, and
  - g. The results of any split sampling, spikes or repeat sampling.
2. The discharger shall maintain a written record of any spills, seeps, and/or leaks of effluent, leachate and/or process fluids not authorized by this discharge plan.
3. The discharger shall maintain a written record of the operation, maintenance and repair of facilities/equipment used to treat, store and/or dispose of waste water; to measure flow rates; and/or to monitor water quality. This will include repairs, replacement or calibration of any monitoring equipment and repairs or replacement of any equipment used in the Person Generating Station remediation system.
4. The discharger shall maintain a written record of the amount of effluent discharges to the UNM Golf Course.

#### **Inspection and Entry**

In accordance with § 74-6-9.B & E NMSA 1978 and WQCC Reg. 3-107.D., the discharger shall allow the Secretary or her authorized representative, upon the presentation of credentials, to:

1. Enter at regular business hours or at other reasonable times upon the discharger's premises or where records must be kept under the conditions of this discharge plan.

Jeff Sterba  
DP-1006  
January 15, 1995  
Page 5

2. Inspect and copy, during regular business hours or at other reasonable times, any records required to be kept under the conditions of the discharge plan.

3. Inspect, at regular business hours or at other reasonable times, any facility, equipment (including monitoring and control equipment), practices or operations regulated or required under this discharge plan.

4. Sample or monitor, at reasonable times for the purpose of assuring discharge plan compliance or as otherwise authorized by the New Mexico Water Quality Act, any effluent at any location before or after discharge.

#### **Duty to Provide Information**

In accordance with § 74-6-9.B NMSA 1978 and WQCC Reg. 3-107.D., the discharger shall furnish to the NMED, within a reasonable time, any relevant information which it may request to determine whether cause exists for modifying, terminating and/or renewing this discharge plan or to determine compliance with this plan. The discharger shall furnish to the NMED, upon request, copies of records required to be kept by this discharge plan.

#### **Spills, Leaks and Other Unauthorized Discharges**

This approval authorizes only those discharges specified in the discharge plan. Any unauthorized discharges violate WQCC Reg. 3-104, and must be reported to the NMED and remediated as required by WQCC Reg. 1-203. This requirement applies to all seeps, spills, and/or leaks discovered from the Person Generating Station remediation system.

#### **Retention of Records**

The discharger shall retain records of all monitoring information, including all calibration and maintenance records, copies of all reports required by this discharge plan, and records of all data used to complete the application for this discharge plan, for a period of at least five years from the date of the sample collection, measurement, report or application. This period may be extended by request of the Secretary at any time.

#### **Enforcement**

Jeff Sterba  
DP-1006  
January 15, 1995  
Page 6

Failure to grant the Secretary or her authorized representative access to the records required to be kept by this discharge plan or to allow an inspection of the discharge facilities or to the collection of samples is a violation of this discharge plan and the WQCC Regulations. Such violations as well as other violations of the discharge plan, may subject the discharger to a compliance order, a compliance order assessing a civil penalty or an action in district court pursuant to § 74-6-10 NMSA 1978, and/or modification or termination of this discharge plan pursuant to § 74-6-5.L NMSA 1978. Penalties assessed as part of a compliance order shall not exceed \$15,000 per day for violations of the terms of this permit or the requirements of § 74-6-5 NMSA 1978, and shall not exceed \$10,000 per day for violations of other sections of the Water Quality Act.

#### **Modifications and/or Amendments**

The discharger shall notify NMED, pursuant to WQCC Regs. 3-107.C, of any modifications or additions to the Person Generating Station's remediation system, including any increase in waste water flow rate or waste water storage and disposal management changes to the system as approved under this discharge plan. The discharger shall obtain NMED's approval, as a discharge plan modification, prior to any increase in the quantity or concentration of constituents in the leachate above those approved in this plan. Please note that WQCC Regs. 3-109.E and F provide for possible future amendment of the plan.

#### **Other Requirements**

Please be advised that the approval of this plan does not relieve PNM of liability should your operation result in actual pollution of surface or ground water which may be actionable under other laws and/or regulations.

#### **RIGHT TO APPEAL**

If PNM is dissatisfied with this action taken by NMED, PNM may file a petition for hearing before the WQCC. This petition shall be in writing to the Water Quality Control Commission within thirty (30) days of the receipt of this letter. Unless a timely request for hearing is made, the decision of the NMED shall be final.

Jeff Sterba  
DP-1006  
January 15, 1995  
Page 7

**TRANSFER OF DISCHARGE PLAN**

Prior to any transfer of ownership, the discharger shall provide the transferee a copy of the discharge plan, including a copy of this approval letter and shall document such to the NMED.

Jeff Sterba  
DP-1006  
January 15, 1995  
page 7

**PERIOD OF APPROVAL**

Pursuant to WQCC Reg. 3-109.G.4., this discharge plan approval is for a period of 5 years. This approval will expire January 15, 2000 and you must submit an application for renewal at least 120 days before that date.

Sincerely,

  
Marcy Leavitt, Chief  
Ground Water Protection &  
Remediation Bureau

ML/RO/ro

Enclosures: Discharge Plan Summary Sheet

cc: Garth Graves, NMED District I Manager  
Dan Vigil, NMED HPM, Albuquerque  
Terri Davis, Geologist, H&RMB  
Ron Johnson, PNM, Alvarado Square, Albuquerque 87158  
Gary Richardson, Metric Corp., 8429 Washington  
Place, Albuquerque, NM 87113

NMED, GROUND WATER SECTION, DISCHARGE PLAN SUMMARY

Discharge Plan Number..... 1006  
Date Report Generated..... 11-JAN-95  
Staff Reviewer..... RICHARD OHRBOM

Legally Responsible Party. JEFF STERBA SR. V.P. 848-2838  
Owner..... PUBLIC SERVICE CO OF NM  
ALVARADO SQUARE  
ALBUQUERQUE NM 87158

Facility..... PNM PERSON STATION-UNM GOLF COURSE

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Primary Waste Type..... INDUSTRIAL GENERATING STATION  
Treatment..... HYDROCARBON REMEDIATION AIR STRIPPER  
Discharge..... LAND APPLICATION RECREATION  
Discharge Location..... UNM SOUTH GOLF COARSE

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Application Received..... 13-JUN-94                      Discharge Volume.. 288000 gpd  
Public Notice Published... 18-JUL-94                    Depth to GW..... 265 feet  
Discharge Plan Approved... 15-JAN-95                   TDS..... 250 mg/l  
Discharge Plan Expires.... 15-JAN-00

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Monitoring Reports due.... 15-FEB 15-MAY 15-AUG 15-NOV

<u>Sampling Category</u>	<u>Annual Frequency</u>	<u>No. of Sites</u>	<u>Sampling Description</u>
2	12	1	Monthly volume of effluent to UNM, report quarterly
6	12	4	VOC's, Influent, Effluent, and Golf Course Ponds. Report Quarterly

\_\_\_\_\_ If this space is checked, monitoring requirements are summarized or explained in more detail on the attached sheet. Any inadvertent omission from this summary does not relieve the discharger of responsibility for compliance with that requirement.

Send All monitoring reports or correspondence to:      RICHARD OHRBOM  
Ground Water Section  
Environment Department  
1190 St. Francis Drive  
Santa Fe NM 87503  
(505) 827-2900