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ENVIRONMENT DEPARTMENT

*Surface Water Quality Bureau*

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Cabinet Secretary-Designate

BUTCH TONGATE  
Deputy Secretary

ERIKA SCHWENDER  
Director  
Resource Protection Division

**Certified Mail - Return Receipt Requested**

January 24, 2014

Mr. Chris Olson, Vice President Generation  
Public Service Company of New Mexico (PNM)  
2401 Aztec NE MS Z120  
Albuquerque, NM 87107

**Re: Public Service Company of New Mexico, Person Station, Minor, Individual Permit; SIC 4911; NPDES Compliance Evaluation Inspection; NM0030384; January 17, 2014**

Dear Mr. Olson:

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:

Diana McDonald  
US Environmental Protection Agency, Region VI  
Enforcement Branch (6EN-WM)  
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 Sarah Holcomb at 505-827-2798 or at [sarah.holcomb@state.nm.us](mailto:sarah.holcomb@state.nm.us).

Public Service Company of NM – Person Station

January 24, 2014

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Sincerely,

*/s/ Bruce 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  
Raquel Douglas, USEPA (6EN-WM) by e-mail  
Brent Larsen, USEPA (6WQ-PP) by e-mail  
Hannah Branning, USEPA (6EN-WC) by e-mail  
Gladys Gooden-Jackson, USEPA (6EN) by e-mail  
NMED District 1, William Chavez by e-mail



Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

### 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   8   4   11   12   1   4   0   1   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   4					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 NM (PNM), Person Generating Station, 701 Electric Ave. SE, Albuquerque, NM 87105. Bernalillo County.	Entry Time /Date 1130 hours / 1-17-2014	Permit Effective Date 9-1-2010
	Exit Time/Date 1200 hours / 1-17-2014	Permit Expiration Date 8-31-2015
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Mr. John Hale, P.E. Technical Project Manager, PNM Resources, 505-241-2014, cell 505-362-1129	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Mr. Chris Olson, Vice President of Generation Public Service Company of NM, 2401 Aztec NE, MS Z120, Albuquerque, NM 87107	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> *	Outfall 001 N. 35.029167° W. -106.641944°  SIC 4911 (Inactive)

#### Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	S	Operations & Maintenance	N	CSO/SSO
S	Records/Reports	N	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	N	Laboratory	N	Storm Water	N	Other:

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

1. Please see further explanations for more information.

Name(s) and Signature(s) of Inspector(s) Sarah Holcomb /s/ Sarah Holcomb	Agency/Office/Telephone/Fax 505-827-2798	Date 1-24-2014
Signature of Management QA Reviewer Bruce Yurdin /s/ Bruce Yurdin	Agency/Office/Phone and Fax Numbers 505-827-2795	Date 1-24-2014

## SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS  
DETAILS:

S  M  U  NA (FURTHER EXPLANATION ATTACHED YES)

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE

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

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.  
DETAILS:

S  M  U  NA (FURTHER EXPLANATION ATTACHED NO)

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.

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.

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.

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.

Y  N  NA

## SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED.  
DETAILS:

S  M  U  NA (FURTHER EXPLANATION ATTACHED NO)

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.

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 NO.)  
 DETAILS:

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.  Y  N  NA

5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.  Y  N  NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE  Y  N  NA

a) SAMPLES REFRIGERATED DURING COMPOSITING.  Y  N  NA

b) PROPER PRESERVATION TECHNIQUES USED.  Y  N  NA

c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.  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:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED.  Y  N  NA  
 TYPE OF DEVICE No totalizing meter/No flow measurement device installed

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.  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.  Y  N  NA

## SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED NO.)  
 DETAILS:

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. 100 % OF THE TIME.  Y  N  NA
6. SPIKED SAMPLES ARE ANALYZED.     % OF THE TIME.  Y  N  NA
7. COMMERCIAL LABORATORY USED.  Y  N  NA

LAB NAME  
 LAB ADDRESS  
 PARAMETERS PERFORMED

**SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS.**  S  M  U  NA (FURTHER EXPLANATION ATTACHED YES).

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	No discharge						

RECEIVING WATER OBSERVATIONS

**SECTION H - SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS.  S  M  U  NA (FURTHER EXPLANATION ATTACHED NO).  
 DETAILS:

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: N/A (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

**SECTION I - SAMPLING INSPECTION PROCEDURES** (FURTHER EXPLANATION ATTACHED    ).

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

**PNM-Person Generating Station  
Compliance Evaluation Inspection  
NPDES Permit No. NM0030384  
January 17, 2014**

**Further Explanations**

**Introduction**

On January 17, 2014, Sarah Holcomb of the New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB) conducted a Compliance Evaluation Inspection (CEI) at the PNM Person Generating Station groundwater treatment facility at 701 Electric Avenue SE, Albuquerque, NM 87105 in Bernalillo County. The PNM groundwater treatment system has a maximum daily flow rate of 100 gallons per minute or 0.144 million gallons per day and 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 NM0030384.

This permit authorizes discharges from Outfall 001 to an unnamed unlined tributary, thence to Albuquerque Metropolitan Arroyo Flood Control Authority (AMAFCA) South Diversion Channel, thence to the Rio Grande in segment 20.6.4.105 NMAC. This segment includes the designated uses of irrigation, marginal warmwater aquatic life, livestock watering, public water supply, wildlife habitat and primary contact.

The NMED 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 Permittee's representatives, observations made by the NMED inspector, and records and reports kept by the Permittee and/or NMED.

There is no on-site contact for the groundwater treatment system of the inactive power plant. The inspector conducted an inspection at PNM-Reeves this same morning, and was escorted to this site from that location. Mr. Hale provided access through a locked gate at the east end of the paved portion of Electric Ave. The inspector and Mr. Hale toured the facility. An exit interview to discuss preliminary findings was conducted with Mr. Hale on-site. The inspector left the facility at approximately 1200 hours on the day of this inspection.

**Treatment Scheme**

Person Generating Station is decommissioned, non-operational, electric power generating station. The previous NPDES permit (NM0029564) which authorized the discharge of cooling tower blowdown was terminated in 1991. PNM has a hazardous waste facility permit from the NMED Hazardous Waste Bureau (HWB) for post-closure care to monitor groundwater and perform corrective actions at the Person Generating Station. According to the Permittee's on-site representative, solid waste management units and areas of concern, including a waste oil tank (un-lined well used for disposal of waste oil, solvents, paint and thinners) are closed. An active treatment system to remediate groundwater contamination from chlorinated volatile organic compounds (VOCs) disposed in the un-lined well exists on site.

Elements of the groundwater treatment system (GWTS), which is housed in an enclosed, on-site structure, include 8 extraction wells, two surge tanks (influent and effluent), bag filters, and two granulated activated carbon (GAC) units. Influent is combined into an equalization tank then gravity flows to a 785-gallon surge tank. From the influent surge tank, water is pumped through four bag filters that are designed to remove suspended solids. Following the bag filters, water is pumped through two GAC units connected in series, which function as the treatment component for VOC removal. As water passes through the GAC units, VOCs adhere to surface areas of the carbon media. Sampling ports are situated in the line after each GAC unit. Based on monitoring results of the ports, most notably the port between the units, facility personnel determine treatment capability remaining on the primary GAC. When sampling analyses from the port directly after the primary GAC unit indicate detectable levels of VOCs (i.e. breakthrough), it is replaced with a new unit containing fresh media. Typically, the GAC unit in the primary position is replaced every four or five months.

Other components of the GWTS include:

- Pressure monitoring points before and after the carbon units that provide an indication of potential media fouling and/or line clogging (from solids accumulation) or biofouling; operators may replace the GAC unit(s) or backwash it. Pressure monitoring points are also located before and after the bag filters.

- Electronic controls that automatically shut down the system in response to high or low surge tank water levels, high east pond water level, and/or high water level in the building floor sump. In addition, manual system shutdown mechanisms are installed.
- Flow totalizers situated at various points in the treatment system that allow monitoring of total system flows and total volume of water treated.

The GWTS is designed to operate 24 hours per day, 365 days per year. According to the Permittee's on-site representative, no groundwater purging or other release of untreated groundwater occurs at the extraction wells.

Treated effluent, approximately 50 gallons per minute according to the Permittee's on-site representative, is pumped to two University of New Mexico South Golf Course irrigation storage lagoons or ponds. UNM installed a pipe that drains a portion of the water from the east pond into the west pond via gravity flow. Water from both ponds is used to spray irrigate the golf course regulated by NMED Ground Water Quality Bureau (GWQB) Discharge permit no. 1006.

No mechanism, piping or outfall is constructed to discharge treated groundwater to the arroyo located on the north side of the PNM property boundary. PNM maintains the permit as a contingency in the event various circumstances (e.g., modification or termination of the GWQB DP) temporarily or permanently preclude discharges to the golf course ponds. NPDES Outfall 001 (as noted in the permit) is located adjacent to both the Delta-Person Generating Station NPDES outfall and the storm water outfall from the PNM Person site.

## **Further Explanations**

Note: The sections are arranged according to the format of the enclosed EPA Inspection Checklist (Form 3560-3), rather than being ranked in order of importance.

### **Section A- Permit Verification Evaluation – Overall Rating of “Satisfactory”**

The permit states in Part III.A.4, Duty to Reapply:

*If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. The application shall be submitted at least 180 days before the expiration date of this permit. The Director may grant permission to submit an application less than 180 days in advance but no later than the permit expiration date. Continuation of expiring permits shall be governed by regulations promulgated at 40 CFR Part 122.6 and any subsequent amendments.*

### **Findings** for Permit Verification:

The NPDES permit for this facility is maintained as a backup in the event that the discharge of the remediated groundwater at the UNM golf course ponds is no longer feasible. During the inspection, the permittee’s representative indicated that due a slight exceedance of the trichloroethylene limit in their RCRA permit, PNM is required to keep the RCRA permit for an additional three years. According to the permittee’s representative, PNM had anticipated terminating the NPDES permit in the near future, but will need to keep it for the duration of the RCRA permit’s requirements.

The permit will expire on August 31, 2015, so PNM will need to submit an NPDES permit reapplication no later than February 28, 2015.