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Surface Water Quality Bureau

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DAVE MARTIN
Secretary

BUTCH TONGATE
Deputy Secretary

JAMES H. DAVIS, Ph.D.
Director
Resource Protection Division

Certified Mail - Return Receipt Requested

June 20, 2012

Patrick Themig, Vice President Generation
Public Service Company of New Mexico (PNM)
Alvarado Square MS 1030
Albuquerque, N.M., 87158-0001

RE: Minor-Non-Municipal, SIC 4911, NPDES Compliance Evaluation, PNM / Person Generating Station,
NM0030384, June 18, 2012

Dear Mr. Themig,

Enclosed, please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB) 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.

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 to modify your operational and/or administrative procedures, as appropriate. 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
Allied Bank Tower
Region VI Enforcement Branch (6EN-WM)
1445 Ross Avenue
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

I appreciate the cooperation of John Hale, P.E., PNM Resources during the inspection. If you have any questions about this inspection report, please contact me at (505) 827-0418.

Sincerely,

/s/ Erin S. Trujillo
Erin S. Trujillo
Surface Water Quality Bureau

cc: Marcia Gail Adams, USEPA (6EN-AS) by e-mail
Samuel Tate, EPA (6EN-AS) by e-mail
Carol Peters-Wagon, USEPA (6EN-WM) by e-mail
Diana McDonald, USEPA (6EN-WM) by e-mail
Hannah Branning, USEPA (6EN-WC) by e-mail
Larry Giglio, USEPA (6WQ-PP) by e-mail
Bill Chavez, Acting NMED District I Manager by e-mail
John Hale, P.E., PNM Resources 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 2 0 6 1 8 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 3					71 N	72 N	73	74 75 M I N O R	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 New Mexico (PNM), Person Generating Station, 701 Electric Avenue SE, Albuquerque, New Mexico 87105. Bernalillo County	Entry Time /Date 1000 hours / 06/18/2012	Permit Effective Date September 1, 2010
	Exit Time/Date 1130 hours / 06/18/2012	Permit Expiration Date August 1, 2015
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) -John Hale, P.E., Technical Project Manager, PNM Resources, 505-241-2014, cell 505-362-1129	Other Facility Data Outfall 001 (Permitted) Latitude 35.029167° Longitude -106.641944°	
Name, Address of Responsible Official/Title/Phone and Fax Number Patrick Themig, Public Service Company of New Mexico, Alvarado Square MS 1030, Albuquerque, New Mexico 87158-0001 / Vice President / Switchboard 505-241-2700	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> * Contacted	Inactive SIC 4911 (Electric Services)

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

M	Permit	N	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. SEE ATTACHED CHECKLIST REPORT WITH FURTHER EXPLANATIONS AND PHOTO LOG.

Name(s) and Signature(s) of Inspector(s) Erin S. Trujillo /s/ Erin S. Trujillo	Agency/Office/Telephone/Fax NMED/SWQB/505-827-0418	Date 06/20/2012
Signature of Management QA Reviewer Richard E. Powell /s/ Richard E. Powell	Agency/Office/Telephone/Fax NMED/SWQB/505-827-2798	Date 06/20/2012

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

S M U NA (FURTHER EXPLANATION ATTACHED Yes)

DETAILS: **The physical address on the permit for the station appears incorrect (should be 701 Electric Ave SE—not SW). Sample type for pH and temperature specified in permit needs to be clarified or corrected.**

- 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE **Permittee mailing address is not updated.** Y N NA
- 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES **No discharge** Y N NA
- 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT **No outfall constructed** Y N NA
- 4. ALL DISCHARGES ARE PERMITTED **No discharge** Y N NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT.

S M U NA (FURTHER EXPLANATION ATTACHED No)

DETAILS: **Permittee has approved subscriber agreement to use NetDMR dated Feb 2012. Reviewed DMRs since last inspection on 02/11/2009 thru 1st Qtr 2012. No reported discharge.**

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. **No discharge / No analytical results** Y N NA
- 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. **No discharge** 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. **No discharge / No analysis** S M U NA
- 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR. **Not evaluated** 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.

S M U NA (FURTHER EXPLANATION ATTACHED No)

DETAILS:

- 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 **Yes**),
 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
If discharge, then
- a) SAMPLES REFRIGERATED DURING COMPOSITING. **compositing would be required for PCBs and WET** 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 **Yes**)
 DETAILS: **If discharge, pH, Temp and DO would need to be analyzed on site.**

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. **Not evaluated / Written procedures not on site** S M U NA
5. DUPLICATE SAMPLES ARE ANALYZED. _____% 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 **No**).

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

RECEIVING WATER OBSERVATIONS: No flow on the day of this inspection.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED **No**).

DETAILS: **No sewage sludge**

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: Not Applicable (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED **No**).

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
June 18, 2012**

Further Explanations

Introduction

On June 18, 2012, Erin Trujillo 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, New Mexico 87105 in Bernalillo County, New Mexico. PNM groundwater treatment system has a maximum daily flow rate of 100 gallons per minute or 0.144 million gallons per day (USEPA Public Notice of Draft NPDES Permit dated May 29, 2010) 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 20.6.5.105 *State of New Mexico Standards for Interstate and Intrastate Surface Waters, 20.6.4 New Mexico Administrative Code (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 inspectors, 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 arrived at approximately 1000 hours on the day of this inspection at the PNM Power Operations office which is also at 701 Electric Avenue SE, Albuquerque, New Mexico 87105 and contacted the Permittee's representative. Upon John Hale, P.E., Technical Project Manager, PNM Resources arrival at approximately 1026 hours, the inspector made introductions, presented credentials and explained the purpose of the inspection. Mr. Hale provided access through a locked gate at the east end of paved portion of Electric Avenue. 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 1130 hours on the day of this inspection.

Treatment Scheme

Person Generating Station is a 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 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 ground water 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. The GTS is designed to operate 24 hours per day 365 days per year. According to the Permittee 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 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 (DP) 1006.

No mechanism, piping or outfall is constructed to discharge treated groundwater to the arroyo located on the north side of PNM property boundaries. The permittee maintains an NPDES permit as a contingency if flow to the golf course ponds was not allowed or feasible.

Section A – Permit Verification – Overall Rating of “M = Marginal”

Permit Requirements for Permit Verification

Part III.D.9 (Standard Conditions, Other Information) of the permit states:

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.

Findings for Permit Verification

The following items on the NPDES permit appear to need update, correction and/or clarification:

- Permittee mailing address (facility is not staffed) on permit title page
- Facility physical address (701 Electric Ave SE—not SW) on permit title page
- Outfall location on permit title page
- Sample type monitoring requirements for pH grab (totalizer) and temperature totalizing meter in Part I.A of the permit

The discharge location (if constructed) described by the Permittee on-site representative on the day of this inspection appears consistent with a vicinity map contained in the Permittee application in NMED SWQB files. However, the discharge location (latitude and longitude) on the Permittee application and on the title page of the permit is approximately 400 feet east of the intended location of the outfall based on readily-available on-line mapping tools.

Figure 1: PNM Person Generating Station



Figure 2 Outfall Location



Sections D and F – Self Monitoring and Laboratory

Permit Requirements for Self-Monitoring and Laboratory

Part III.B.3.a (Standard Conditions, Proper Operation and Maintenance) of the permit states:

Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures.

Part III.C.5 (Standard Conditions, Monitoring Procedures) of the permit states:

a. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit or approved by the Regional Administrator.

b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to insure accuracy of measurements and shall maintain appropriate records of such activities.

c. An adequate analytical quality control program, including the analyses of sufficient standards, spikes and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.

Comments for Self-Monitoring and Laboratory

An on-site laboratory and sample processing area is located in the GWTS building. Testing for other state permit requirements is conducted both on site and off-site at commercial laboratories. Some of the effluent monitoring required under this NPDES permit (e.g., pH, Temperature and DO) would need to be conducted on site. Prior to discharge authorized under this NPDES permit, additional on-site analytical equipment and written procedures for monitoring (both on-site and commercial laboratory analysis) would be required to meet USEPA approved methods in 40 CFR 136. For example, only two buffers were used on site for pH instrument calibration. Approved methods in 40 CFR 136.3 require a bracket calibration and three buffer standardization prior to sample analysis. Additional quality control elements in 40 CFR 136 would need to be documented in effluent monitoring and analytical testing standard operating procedures under this NPDES permit (see Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act; Analysis and Sampling Procedures modified by Federal Register, Vol. 77, No. 97 on Friday, May 18, 2012 effective June 18, 2012).

**NMED/SWQB
Official Photograph Log
Photo # 1**

Photographer: Erin S. Trujillo	Date: 06/18/2012	Time: 1050 hours
City/County: Albuquerque / Bernalillo	State: New Mexico	
Location: PNM / Person Generating Station		
Subject: Vapor monitoring and groundwater extraction wells at concrete capped waste oil tank (unlined well). Sheltered (covered and enclosed) groundwater treatment system (GWTS) building is in background of this photo. Enclosed carbon filtration tanks and nitrogen cylinders were stored outside the GWTS building.		

