

TABLE OF CONTENTS

PERMIT ATTACHMENT A - FACILITY DESCRIPTION AND HISTORY	5
A.1 GENERAL INFORMATION	5
A.2 FACILITY TOPOGRAPHY AND HYDROLOGY	5
A.2.1 Surrounding Land Use	6
A.3 SOIL CONTAMINATION AND REMEDIATION	6
A.3.1 Soil and Pore Gas Confirmation Sampling.....	7
A.3.2 Soil Sample and Soil Vapor Analytical Results	7
A.4 CURRENT CONDITIONS	7
A.5 DESCRIPTION OF THE CORRECTIVE ACTION SYSTEM	7
A.5.1 Groundwater Monitor Well Network	7
A.5.2 Groundwater Extraction Well Network.....	7
A.5.3 Groundwater Treatment System	8
PERMIT ATTACHMENT B - INSPECTION REQUIREMENTS	11
B.1 INSPECTION / MAINTENANCE / REPAIR AND FREQUENCIES.....	11
B.2 REMEDIATION SYSTEM INSPECTION / MAINTENANCE / REPAIR.....	11
B.2.1 Inspection	11
B.2.2 Maintenance / Repair	11
B.3 MONITOR WELL NETWORK INSPECTION / MAINTENANCE / REPAIR.....	11
B.3.1 Inspection.....	11
B.3.2 Maintenance / Repair	12
B.4 SECURITY FENCE INSPECTION / MAINTENANCE / REPAIR	12
B.4.1 Inspection	12
B.4.2 Maintenance / Repair	12
B.5 UNLINED WELL INSPECTION / MAINTENANCE / REPAIR	12
B.5.1 Inspection	12
B.5.2 Maintenance / Repair	12
B.6 INSPECTION RECORD KEEPING AND CORRECTIVE ACTION	12
PERMIT ATTACHMENT C - LIST OF SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN	14
PERMIT ATTACHMENT D – FINANCIAL ASSURANCE DOCUMENTS.....	15
PERMIT ATTACHMENT E – FIGURES	21
PERMIT ATTACHMENT F - COMPLIANCE SCHEDULE	33

LIST OF TABLES

Permit Location	No.	Description
Part 2	2-1	Potential Equipment/System Failures and Solutions
Part 4	4-1	Concentration Limits for Hazardous Constituents
Part 4	4-2	Groundwater Extraction Well Pumping Rates
Part 4	4-3	Key Well Network
Part 4	4-4	Groundwater General Chemistry Parameters
Permit Attachment A	A-1	Groundwater Monitoring and Extraction Well Construction Details
Permit Attachment A	A-2	Groundwater Monitoring and Extraction Well Status
Permit Attachment B	B-1	GWTS Inspection Components
Permit Attachment C	C-1	List of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) Requiring Corrective Action
Permit Attachment C	C-2	List of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) Corrective Action Complete Without Controls
Permit Attachment C	C-3	List of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) Corrective Action Complete With Controls
Permit Attachment F	F-1	Compliance Schedule

LIST OF FIGURES

Permit Location	No.	Description
Permit Attachment E	E-1	Facility Location Map
Permit Attachment E	E-2	Aerial Photograph
Permit Attachment E	E-3	Topographic Map Including 100 Year Floodplain
Permit Attachment E	E-4	Current Zoning, Land Use, Surface Water Bodies and Wind Rose
Permit Attachment E	E-5	Groundwater Treatment System Building Emergency Equipment Location and Evacuation Routes
Permit Attachment E	E-6	Monitor and Extraction Well Network
Permit Attachment E	E-7	Groundwater Treatment System Process Flow Diagram
Permit Attachment E	E-8	Key Well Network
Permit Attachment E	E-9	Concentration of 1,1-DCE in Shallow Groundwater October 2006
Permit Attachment E	E-10	Concentration of PCE in Shallow Groundwater October 2006
Permit Attachment E	E-11	Groundwater Treatment System Photo
Permit Attachment E	E-12	Groundwater Treatment System Photo

LIST OF ABBREVIATIONS/ACRONYMS

bgs	below ground surface
CFR	Code of Federal Regulations
°C	degrees Celsius
DQO	Data Quality Objective
EC	Emergency Coordinator
EPA	U.S. Environmental Protection Agency
HWA	New Mexico Hazardous Waste Act
L	liter(s)
MCL	maximum contaminant level
µg	microgram(s)
mg	milligram(s)
MS	matrix spike
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NMSA	New Mexico Statutory Authority
OSHA	Occupational Safety and Health Administration
PCIF	Post-Closure Inspection Form
ppmv	part(s) per million volume basis
QA	Quality assurance
QC	Quality control
RCRA	Resource Conservation and Recovery Act
SWMU	Solid Waste Management Unit
TCE	Trichloroethene
VOC	Volatile organic compound

PERMIT ATTACHMENT A - FACILITY DESCRIPTION AND HISTORY

A.1 GENERAL INFORMATION

The Permittee operated the Person Generating Station (Facility) from 1952 to 1986. Photographs of the Facility taken in 2007 are presented in Permit Attachment E (*Figures*). The Facility is located on a 22-acre site south of the Albuquerque metropolitan area in Bernalillo County, New Mexico (Figure E-1). The site is northeast of the intersection of Broadway Boulevard and Rio Bravo Boulevard and is approximately 2 miles (mi) east of the Rio Grande. Figure E-2 is an aerial photograph of the site showing on-site buildings, abutting properties, and important features of the site, including the Unlined Well and the groundwater treatment system (GWTS) building.

The power plant contained four oil-fired electric generating units that were built between 1951 and 1957 with the rated capacity of each unit ranging from 18 to 33 megawatts (MW). The generating units operated regularly until 1981, after which intermittent operations occurred from 1982 to 1986. The power generating facilities were deactivated in 1993.

The generating station consisted of several supporting structures including four aboveground 10,000 to 50,000-barrel fuel oil tanks, four cooling towers, a switchyard and several large-capacity water production wells. Several of the support structures, such as the evaporative cooling towers have been removed. The switchyard is operational, but is not typically staffed because of its automated control systems. The Permittee also operates a Power Operations Center within the Facility boundary. Access to the operations center is controlled separately from access to the former power plant/structures and is restricted by a series of security fences and locked gates.

Present-day activities at the Facility (excluding the Power Operations Center) include: periodic switchyard maintenance; operation and maintenance of the GWTS; collection of groundwater samples from monitoring and extraction wells; and, Facility inspections and other miscellaneous activities.

In July 2000, a single unit, simple-cycle, gas turbine generating unit with a nominal rating of 132 MW was installed and began operating commercially. This generating unit, known as the Delta-Person Generating Station, is owned and operated by Delta-Power, LLC (Figure E-1).

A.2 FACILITY TOPOGRAPHY AND HYDROLOGY

The Facility is located on a terrace along the eastern edge of the Rio Grande Valley. Ground surface elevations range from approximately 5,015 to 5,070 feet above mean sea level within the property boundaries. Surface water in the area consists mainly of the Rio Grande River, located approximately two miles from the site and flowing north to south, and the Albuquerque Municipal Arroyo Flood Control Authority South Diversion Channel, an unlined drainage channel located adjacent to the northwest corner of the site that flows only during storm events.

A topographic map of the site and surrounding area, including the 100-year floodplain of the Rio Grande is included as Figure G-3. The topography is provided at a scale of 1 inch equals 400 ft and with elevation contours at 20-ft intervals, sufficient for presenting the generally flat terrain at the site. 2003 data from the Federal Emergency Management Agency indicate that the Facility is not within the designated 100-year floodplain. A portion of the 100-year floodplain (Figure E-3) abuts the Facility to the north, corresponding to a small arroyo that receives intermittent water flow from precipitation events; this arroyo is more than 300 ft from the Unlined Well.

The Rio Grande Basin aquifer lies below the Facility. Depth to groundwater at the Facility ranges from 120 to 200 ft below ground surface (bgs). Groundwater has been grouped into two categories for the purposes of investigation and corrective action: shallow and deeper groundwater. The shallow portion of the aquifer refers to groundwater from 120 ft bgs, and the deeper portion is 200 to 900 ft bgs. Historically, contamination has been detected in the shallow and deeper portions of the aquifer, and the “B Zone” wells screened in the interval between the two groundwater units (from 120 to 200 ft bgs).

The permeability of the aquifer sediments is significantly greater in the horizontal direction than in the vertical direction; thus, documented contaminant migration has been predominately in the horizontal direction with limited vertical migration under natural aquifer conditions. Deeper contamination may have resulted from groundwater production wells associated with the Facility. These production wells have now been plugged, eliminating this transport pathway.

The Person Generating Station is not within 200 ft of a fault that has had displacement during the Holocene and, thus, meets the requirements of 40 CFR § 264.18.

A.2.1 Surrounding Land Use

Figure E-4 presents area land use and zoning around the Person Generating Station, and the wind rose for this area of Albuquerque. As seen on the map, current land types and allowable land uses in proximity of the Facility include surface waters, agricultural, vacant/abandoned, commercial, transportation/utility, and recreation/open space. The BNSF Railroad runs through the right-of-way on the Facility’s western boundary. Interstate 25 and its right-of-way property are located approximately 1,200 ft (0.2 mi) east of the site. The University of New Mexico Championship Golf Course is located east of Interstate 25 approximately 2,100 ft (0.4 mi) to the northeast of, and generally downgradient from, the site. The closest residential development to the site is approximately 1,500 ft (0.3 mi) to the southwest and generally upgradient from the Facility. Future development in the area is expected to be similar to the current land use surrounding the site.

A.3 SOIL CONTAMINATION AND REMEDIATION

An unlined below-grade vertically placed 3.5 feet by 10 feet cylindrical waste oil storage vessel, also referred to as the Unlined Well, located on the north side of the Facility was in use from July 1976 until October 13, 1983 when the vessel was removed from service. Waste oils and greases, kerosene, a water-trisodium phosphate mixture used in steam cleaning, Stoddard Solvent, Dowclene EC and other solvent mixtures generated during maintenance activities were disposed of in the Unlined Well. Dowclene EC is a generic solvent with two primary ingredients: 1, 1, 1-Trichloroethane and Tetrachloroethene. Usage of Dowclene began in 1979. Equipment repainting activities conducted in 1980 generated another type of liquid waste including waste paint, paint thinners and turpentine that were also disposed of in the Unlined Well.

An initial excavation of soil from the Unlined Well occurred in 1983 (disposal of sixteen 55-gallon drums of material in 1987). Preliminary investigations of the nature and extent of soil contamination at the Unlined Well began in 1984; investigation results were subsequently used to develop a Closure Plan and the initial Post-Closure Care Permit issued by the EPA in August 1988. The Unlined Well was capped in 1987; the final cover consisted of two 80-mil high-density polyethylene liners overlain with a 6-inch thick compacted soil layer and a 25-ft by 35-ft, 6-inch thick reinforced concrete slab.

The soil remediation requirements for the Unlined Well were stipulated in the Post-Closure Care Permit issued by the Department in 2000. A soil vapor extraction system (SVE) was operated from 1995-2003 to remove soil contaminants. Remediation of the entire soil column (ground surface to water table) to soil screening levels (SSL) protective of groundwater; and remediation of surface soils (ground surface to 12 ft bgs) to SSLs protective of human health based on a residential land use was required.

A.3.1 Soil and Pore Gas Confirmation Sampling

A soil sampling and analysis program was implemented in 2003 to confirm that soil cleanup levels have been met for the Unlined Well. Three soil borings within 10 ft of the SVE well were completed to approximately 120 ft bgs. Soil samples were collected at nine depths at each location (3, 6, 9, 12, 33, 57, 77, 97 and 117 ft bgs) and analyzed using EPA Method 8260. Surface soil (3, 6, 9 and 12 ft bgs) analytical results were used for comparison to surface soil cleanup levels determined to be protective of human health. Five soil vapor probes (SVP) were installed in each boring at 38, 58, 78, 98 and 118 ft bgs and were analyzed for 1,1-DCE, 1,1,1-TCA, PCE, 1,2,4-trimethylbenzene, and 1,3,5- trimethylbenzene.

A.3.2 Soil Sample and Soil Vapor Analytical Results

The analytical results for 27 total surface (0-12 ft bgs) and subsurface (33-117 ft bgs) soil samples determined that 26 were non-detect for all analytes; PCE was detected in one sample (11.00 µg/kg at SVP-1-33, 33 ft bgs). Results of the analysis of all soil and soil vapor samples were below action levels

A.4 CURRENT CONDITIONS

The Unlined Well was excavated in September 1998. Approximately 52,000 cubic yards of contaminated soil and debris were removed.

The excavation was backfilled with clean soil, to a uniform depth of 4 feet bgs in February 2003. Asphalt was installed over the Regulated Unit. Figure G-2 presents the current configuration and features of the Facility and delineates the area subject to Post-Closure Care.

The extent of groundwater contamination in 2006 is illustrated in Figures E-8, E-9 and E-10.

A.5 DESCRIPTION OF THE CORRECTIVE ACTION SYSTEM

The corrective action system consists of three elements: a groundwater monitor well network; an extraction well network; and a groundwater pump and treat system to remediate contaminated groundwater. These components are described in the following sections.

A.5.1 Groundwater Monitor Well Network

The groundwater monitor well network includes one hydraulically upgradient well, thirteen hydraulically down gradient wells and two deeper aquifer cluster wells illustrated in Figure E-6. Details on well depth, casing size and material and screen length, are presented in Table A-1.

A.5.2 Groundwater Extraction Well Network

The groundwater extraction well network (Figure E-6) includes five recovery wells: VEW, EW-1, EW-2, EW-3, and EW-4. In 2006, the average groundwater extraction rates in gallons per minute (GPM) were: VEW (1.5 gpm), EW-1 (1 gpm), EW-2 (3.5 gpm), EW-3 (39 gpm), and EW-4 (12.5 gpm), for a total average flow rate of approximately 56 gpm.

TABLE A-1
Groundwater Monitor and Extraction Well Construction Details

Well ID	Total Depth of Well (ft)	Casing Size (in)	Casing Material	Screen Length (ft)
PSMW-01R	137	2	PVC	20
PSMW-07R	133	2	PVC	29
PSMW-08B	169	2	PVC	20
PSMW-10	171	2	PVC	20
PSMW-11	165	2	PVC	20
PSMW-13A	164.3	2	PVC	20
PSMW-17	191	4	PVC	20
PSMW-18	185	4	PVC	20
PSMW-20	226	4	PVC	20
PSMW-22	227	4	PVC	20
PSMW-27	269	4	PVC	20
PSMW-37	111	2	PVC	20
VEW (Extraction well)	135	4	PVC	125
EW-1 (Extraction well)	158	4	PVC	22
EW-2 (Extraction well)	197	4	PVC	30
EW-3 (Extraction well)	253	4	PVC	30
EW-4 (Extraction well)	231	4	PVC	10
PSMW-24C-500	577	2	Stainless Steel	10
PSMW-27C-500	717	2	Stainless Steel	10
PSMW-27C-600	717	2	Stainless Steel	10

A.5.3 Groundwater Treatment System

The groundwater treatment system (GWTS) (Figures E-5, E-11 and E-12) was installed in 1995. Currently, the GWTS uses activated carbon to treat approximately 61 gpm of groundwater from five groundwater recovery wells. Figure E-7 presents a process flow diagram for the GWTS. Prior to modification of the GWTS in 2002, the primary treatment involved air stripping followed by activated carbon treatment.

Routine monitoring of the GWTS provides information needed to schedule preventative maintenance and to detect conditions that require repair or replacement. Maintenance procedures for the strainer, equalization tank, influent tank, pump, bag filter, GAC unit, and effluent surge tank are described fully in the O & M manual.

Sampling ports are located throughout the system to allow for collection and analysis of samples to characterize influent and effluent water, and to verify the level of treatment between the GAC

units. The objectives of sampling and analysis are to ensure that groundwater cleanup levels are achieved and to provide operational data needed for routine system maintenance.

Specific sampling collection, analysis, evaluation, and documentation procedures presented in the O&M manual were developed in accordance with the Discharge Plan. Samples will be collected in discrete events to provide a data set representative of actual operating conditions.

Treated groundwater is discharged to two University of New Mexico Championship Golf Course irrigation lagoons under a groundwater discharge permit (DP-1006) from the NMED Ground Water Quality Bureau. The permit allows the discharge of up to 144,000 gallons per day of treated groundwater. Monthly sample collection includes influent and effluent from the two carbon units. All samples are analyzed by EPA Method 8260. The monthly discharge volume is calculated from totalizer readings. Results are reported to NMED semi-annually.

TABLE A-2
Groundwater Monitoring and Extraction Well Status

Well Name	Current Status	Future Status/Comments
Post-Closure Care and Compliance Groundwater Monitoring Wells		
PSMW-01R	Post-closure care down gradient monitoring well	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
PSMW-07R	Post-closure care upgradient monitoring well (background well)	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
PSMW- 08B	Post-closure care down gradient monitoring well	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
PSMW-10	Post-closure care down gradient monitoring well	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
PSMW-11	Post-closure care down gradient monitoring well	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
PSMW-13A	Post-closure care down gradient monitoring well	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
PSMW-17	Post-closure care down gradient monitoring well	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
PSMW-18	Post-closure care down gradient monitoring well	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
PSMW-20	Post-closure care down gradient monitoring well	Plug and abandon following completion of compliance groundwater monitoring. Replace if well goes dry.
PSMW-22	Post-closure care down gradient monitoring well	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
PSMW-27	Post-closure care down gradient monitoring well	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
PSMW-37	Post-closure care down gradient monitoring well	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.

Well Name	Current Status	Future Status/Comments
Extraction Wells Approved for Plug and Abandonment		
PSMW-25	Wells not suited for monitoring due to lack of water	Plug and abandon
PSMW-26	Wells not suited for monitoring due to lack of water	Plug and abandon
EW-5	Wells not suited for extraction due to lack of water	Plug and abandon
Deep Aquifer Monitor Wells		
PSMW-24C-500	Deep regional monitor well	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
PSMW-27C-500 and 600	Deep regional monitor well	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
Extraction Wells		
EW1	Supplies groundwater to the Pump and Treat system	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
EW-2	Supplies groundwater to the Pump and Treat system	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
EW-3	Supplies groundwater to the Pump and Treat system	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
EW-4	Supplies groundwater to the Pump and Treat system	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.
VEW	Supplies groundwater to the Pump and Treat system	Plug and abandon following completion of Post-Closure Care. Replace if well goes dry.

PERMIT ATTACHMENT B - INSPECTION REQUIREMENTS

B.1 INSPECTION / MAINTENANCE / REPAIR AND FREQUENCIES

Systems associated with the Facility shall be routinely inspected. The systems that shall require inspection and maintenance/repair include the groundwater monitoring network, the groundwater remediation system and associated discharge system and the perimeter security fence, security signs, gate locks and survey benchmarks and monuments. Inspection, maintenance and repair of these systems shall be performed on a regularly scheduled basis to ensure the integrity and proper functioning of the systems. These routines are described in more detail in the following sections.

B.2 REMEDIATION SYSTEM INSPECTION / MAINTENANCE / REPAIR

B.2.1 Inspection

The GWTS shall be inspected during each semi-annual groundwater monitoring event. Components of the GWTS as noted in Table B-1 shall be inspected on a semi-annual basis. Results of the inspection shall be noted on the inspection forms.

TABLE B-1
GWTS Inspection Components

Tanks (percent full) – influent and effluent surge levels
Golf Course pond level
Golf Course remote system shut off operational status
I-25 Vault level
Totalizer readings (gallons)
Flow Readings (gallons per minute) – effluent and extraction wells
Transfer Pumps (operating frequency)
Pressure Readings (pounds per square inch) – bag filters
GWTS Pump – cracks in silicon carbide parts; melting or deformation of shaft support, bushing, and rear casing socket; abrasion or cuts of casing liner; wear, scoring, or grooving of carbon bushing; wear of mouth ring; material trapped in impeller vanes; cracks or grooves in inner magnet encapsulation; slurry in pumped liquid; and abrasion of rear casing

B.2.2 Maintenance / Repair

The remediation system shall be maintained/repared/replaced as needed within 60 days of discovery of any needed repairs.

B.3 MONITOR WELL NETWORK INSPECTION / MAINTENANCE / REPAIR

B.3.1 Inspection

All monitor and extraction wells shall be inspected during each semi-annual groundwater monitoring event. The inspection shall note the condition of the components including protective casings and bollards, wellhead covers/caps/locks and well identification markings. Groundwater pumps and sample tubing shall be inspected during each sampling event. Pump replacement and maintenance/repair and tubing replacement shall be performed on an as-needed

basis based upon pump and tubing performance, inspections and review of analytical sampling results.

B.3.2 Maintenance / Repair

The monitor and extraction well components shall be maintained/repaired/replaced as needed within 60 days of discovery of any needed repairs. Maintenance/repair activities shall also ensure that all well components are protected from the weather.

B.4 SECURITY FENCE INSPECTION / MAINTENANCE / REPAIR

B.4.1 Inspection

The fence, gates, locks, and warning signs at the Facility shall be inspected on a semi-annual basis. The inspections shall document in writing the condition of the fence, including fence wires, posts, gates, gate locks, and warning signs and note excessive accumulations of wind-blown plants and debris that would obscure warning signs, block access to the Facility, or interfere with any of the groundwater monitoring network components, or any sampling using said components. Damage or breach in the perimeter fencing or evidence of breach or tampering with gates and/or gate locks shall be documented. Local survey benchmarks and/or monuments shall also be inspected.

B.4.2 Maintenance / Repair

Damage to the fence, gates, locks, warning signs, and survey benchmarks and monuments shall be repaired within 60 days of discovery by routine inspections. Activities may include, but are not limited to, removing excessive accumulations of wind-blown plants and debris, repairing broken wire sections and posts, repairing and oiling gates, cleaning or replacing locks, repairing or replacing warning signs, and removing excess soil and/or vegetation covering survey monuments. Maintenance records shall be maintained with the PCIFs.

B.5 UNLINED WELL INSPECTION / MAINTENANCE / REPAIR

The requirements of this Section (B.5) concerning inspection, maintenance, and repair of the RCRA cap do not apply if the Permittee removes the RCRA cap in accordance with Permit Section 3.8.

B.5.1 Inspection

The inspection shall provide verification that no deterioration of the concrete RCRA cap, including cracks or other signs of malfunction, deterioration, or vandalism has occurred.

B.5.2 Maintenance / Repair

Damage to the RCRA cap shall be repaired within 60 days of discovery by routine inspections.

B.6 INSPECTION RECORD KEEPING AND CORRECTIVE ACTION

Inspection results shall be recorded on Post-Closure Inspection Forms (PCIFs) produced by the Permittee. The form shall include the date and time of the inspection as well as the name of the inspector. Copies of all completed forms shall be provided and summarized in the Operating Record. The completed forms shall document in writing by the inspector, a notation of the observations made, and the date and nature of any repairs or other corrective actions taken. Incomplete inspection forms shall be considered to be representative of incomplete inspections and shall constitute a violation of this Permit.

The PCIFs shall include provisions to inspect the groundwater monitor and extraction well system, the GWTS, security features including fences, gates and signage, and emergency equipment.

Repairs and maintenance shall be undertaken to ensure protection of human health and the environment and mitigate any potential hazards. If an inspection reveals that a non-emergency problem has developed, the needed repairs, maintenance or replacement shall be initiated within three days, unless circumstances beyond the control of the Permittee causes further delay. The Permittee shall limit any such delays to as short a time period as reasonably possible. Repairs shall not take longer than 60 days to complete. If a hazard appears imminent or a hazardous situation already exists, remedial action shall be initiated immediately. Any action taken pursuant to an inspection shall be noted on the PCIF. If any identified hazard meets the definition of an emergency as specified in Section D.1 of Permit Attachment D, the Facility's Contingency Plan shall be implemented by the Permittee, and required notification procedures shall be followed. The Permittee shall report to the Department any remedial activities related to an emergency within one (1) business day.

PERMIT ATTACHMENT C - LIST OF SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN

TABLE C-1 List of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) Requiring Corrective Action			
SWMU / AOC	DESCRIPTION	COMMENTS	
Unlined Well	Used for Disposal of Waste Oil, Solvents, Paint and Thinners	Formerly called Waste Oil Tank	
TABLE C-2 List of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) Corrective Action Complete Without Controls			
SWMU / AOC	DESCRIPTION	DATE OF NFA APPROVAL	COMMENTS
Four Leach Fields	Used for Percolation of Treated Domestic Sanitary Sewerage	July 2005	
Bone Yard Area	Used to Store Scrap Metal, Piping and Equipment	July 2005	
Spin-off Filter Area	Disposal Site for Used Vehicle Oil Filters	July 2005	
Natural Pit Area	Natural Surface Depression Used to Dispose of Used Crankcase Oil and Site of a Fuel Oil Spill	July 2005	
TABLE C-3 List of Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) Corrective Action Complete With Controls			
SWMU / AOC	DESCRIPTION	DATE OF NFA APPROVAL	COMMENTS
Reserved	Reserved	Reserved	Reserved

PERMIT ATTACHMENT D – FINANCIAL ASSURANCE DOCUMENTS

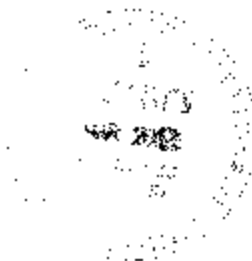
Avantec Square
Albuquerque, NM 87136-2104
P: 505 241 2051
F: 505 241 2176
PNMKeynotes.com

PNM Keynotes

March 29, 2013

Via FedEx

Mr. John Kieling
RCRA Permits Program Manager
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505



RE: Person Generating Station (NMT 360010342) – Updated Financial Assurance Information

Dear Mr. Kieling:

Pursuant to 40 CFR 264.115(f)(5), Public Service Company of New Mexico (PNM) is submitting the following items as required under 40 CFR 264.115(f)(3) for the Person Generating Station.

- A signed letter from PNM's Chief Financial Officer.
- An independent financial auditor's report.

If you have any questions, please contact me at (505) 241-2014.

Sincerely,

John Hale, P.E.
Technical Project Manager

Enclosures

Cc: Dipa Maji – MS 1120

Alvarado Square
Albuquerque, NM 87158-2104
P 505.241.2031
F 505.241.2376
PNMResources.com

March 29, 2011

Mr. John Kieling
RCRA Permits Program Manager
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505

RE: Person Generating Station (NMT 360010342) - Updated Financial Assurance Information

Dear Mr. Kieling:

Pursuant to 40 CFR 264.145(f)(5), Public Service Company of New Mexico (PNM) is submitting the following items as required under 40 CFR 264.145(f)(3) for the Person Generating Station.

- A signed letter from PNM's Chief Financial Officer.
- An independent financial auditor's report.

If you have any questions, please contact me at (505) 241-2014.

John Hale, P.E.
Technical Project Manager
Enclosures

March 29, 2011

New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Attention: John Kieling
RCRA Permits Program Manager

Gentlemen:

I am the Chief Financial Officer of Public Service Company of New Mexico ("PNM"). This letter is in support of this firm's use of the financial test to demonstrate financial assurance for closure and/or post-closure costs, as specified in subpart H of 40 CFR parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

EPA Identification Number: NMT -360010342

**Name: Public Service Company of New Mexico
Person Generating Station**

**Address: Broadway Boulevard and Rio Bravo Boulevard
Albuquerque, NM**

Current Post-Closure Care Cost Estimate: \$872,940.00

2. This firm guarantees, through the guarantee specified in subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: **None**. The firm identified above is: **Not Applicable**.

3. In States where EPA is not administering the financial requirements of subpart H of 40 CFR Parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such tests are shown for each facility: **None**.

Page 2

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost Estimates not covered by such financial assurance are shown for each facility: **None.**

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under Part 144. The current closure cost estimates required by 40 CFR 144.62 are shown for each facility: **None.**

This firm is required to file a Form 10-K with the Securities and Exchange Commission ("SEC") for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk (*) are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended **December 31, 2010.**

Alternative II

1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the five paragraphs above): **\$872,940.00**

2. Current bond rating of most recent issuance of this firm and name of rating service: **Baa3 (Moody's Investors Service)**

3. a) \$60.3 million, Maricopa County, Arizona Pollution Control Corporation, Pollution Control Revenue Refunding Bonds (Public Service Company of New Mexico Palo Verde Project) consisting of 2010 Series A and 2010 Series B.

b) \$343.545 million, City of Farmington, New Mexico, Pollution Control Revenue Refunding Bonds (Public Service Company of New Mexico San Juan Project) consisting of 2010 Series A through F

Date of issuance of bonds: **June 9, 2010**

4. Date of maturity of bonds: **Serial maturities from June 1, 2015 through June 1, 2040**

*5. Tangible net worth (if any portion of the closure and post-closure cost estimates is included in "total liabilities" on your firm's financial statements, you may add the amount of that portion to this line): **\$1,071,717,623**

*6. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.): **Not required; more than 90% of firm's assets are located in the U.S.**

Page 3

*7. Is line 5 at least \$10 million? **Yes**

*8. Is line 5 at least 6 times line 1? **Yes**

*9. Are at least 90% of firm's assets located in the U.S.? If not, complete line 10:
Yes

10. Is line 6 at least 6 times line 1? **Not Applicable**

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Very truly yours,

PUBLIC SERVICE COMPANY
OF NEW MEXICO

Name: Charles N. Eldred

Title: Executive Vice President and Chief Financial Officer

Deloitte & Touche LLP
JPMorgan Chase Tower
2200 Ross Avenue, Suite 1600
Dallas, TX 75201-6778
USA
Tel: +1 214 8407000
www.deloitte.com

REPORT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM ON APPLYING AGREED-UPON PROCEDURES

To the Board of Directors and Stockholder of
Public Service Company of New Mexico
Albuquerque, New Mexico

We have performed the procedures included in the Code of Federal Regulations (CFR) Title 40, Part 264, Section 145 (40 CFR 264.145), which were agreed to by the New Mexico Environment Department Hazardous Waste Bureau and Public Service Company of New Mexico and subsidiaries (the "Company"), solely to assist the specified parties in evaluating the Company's compliance with the financial test option as of December 31, 2010, included in the accompanying letter dated March 29, 2011 from Charles N. Eldred, Executive Vice President and Chief Financial Officer of the Company. Management is responsible for the Company's compliance with those requirements. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants, as adopted by Public Company Accounting Oversight Board (United States). The sufficiency of these procedures is solely the responsibility of the parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures that we performed and related findings are as follows:

1. We recomputed the amount included in item 5 under the caption Alternative II, Tangible net worth, in the letter referred to above, as the line item entitled "Total common stockholder's equity" less the line item entitled "Goodwill" in the audited consolidated financial statements of the Company as of and for the year ended December 31, 2010, on which we have issued our report dated March 1, 2011, and noted no difference. It should be understood that (1) we make no representations regarding the Company's determination and presentation of non-GAAP measure of tangible net worth, and (2) the non-GAAP measure presented may not be comparable to similarly titled measures reported by other companies.

2. We recomputed from, or reconciled to, the audited consolidated financial statements of the Company, the information included in items 6 and 9, under the caption Alternative II, in the letter referred to above and noted no differences.

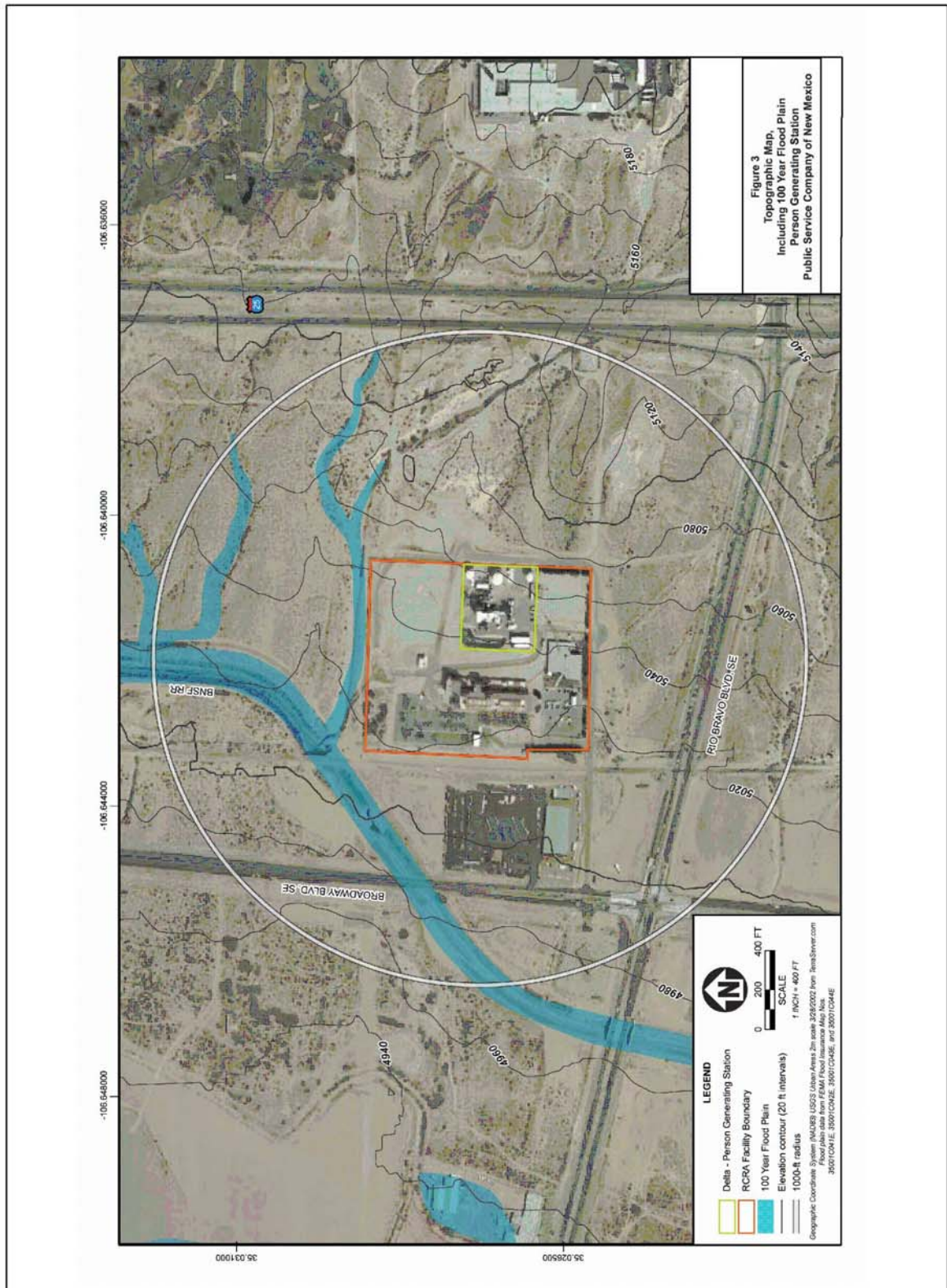
We were not engaged to, and did not, perform an audit conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States), the objective of which is the expression of an opinion on the elements, accounts, or items of a financial statement. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

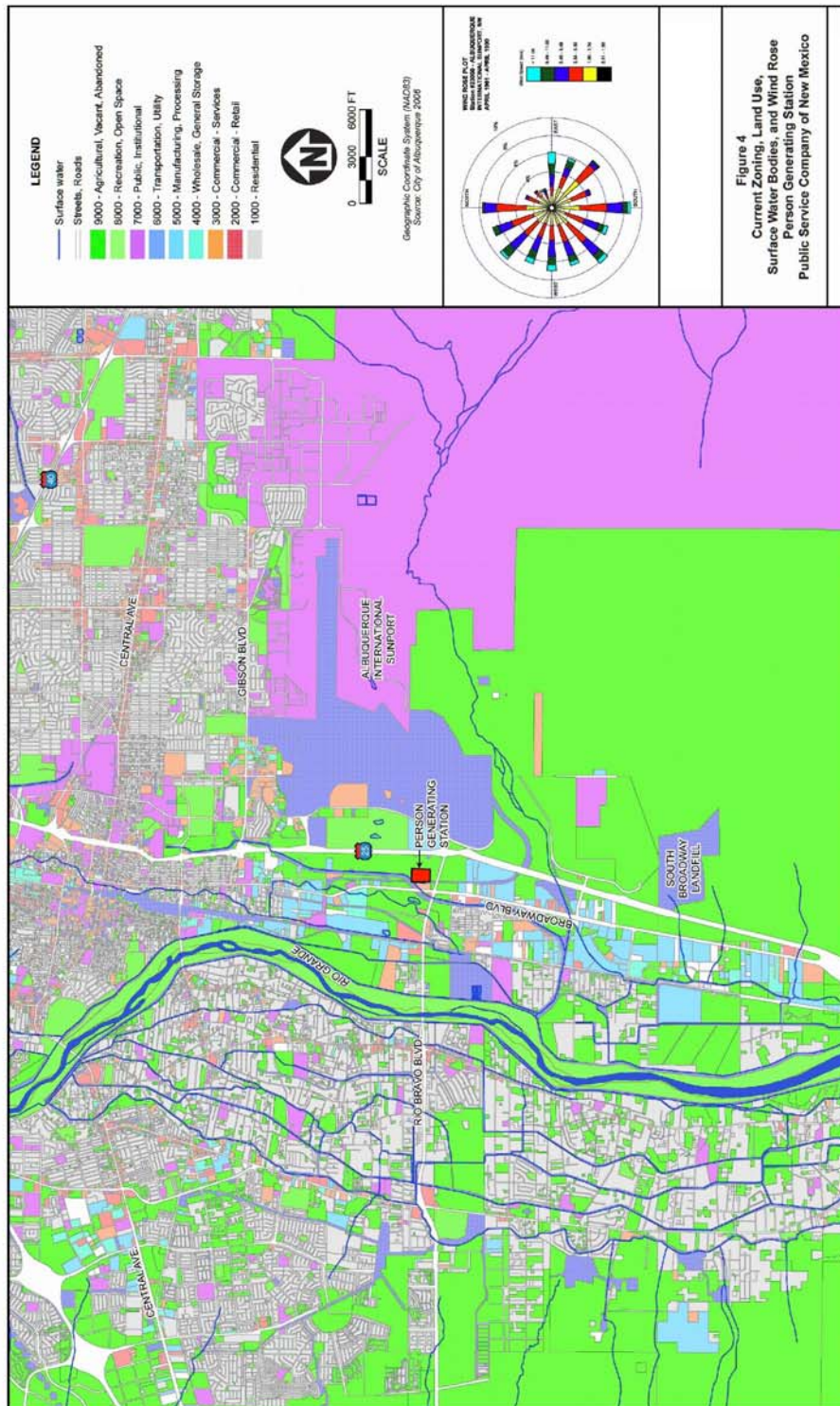
Member of
Deloitte Touche Tohmatsu

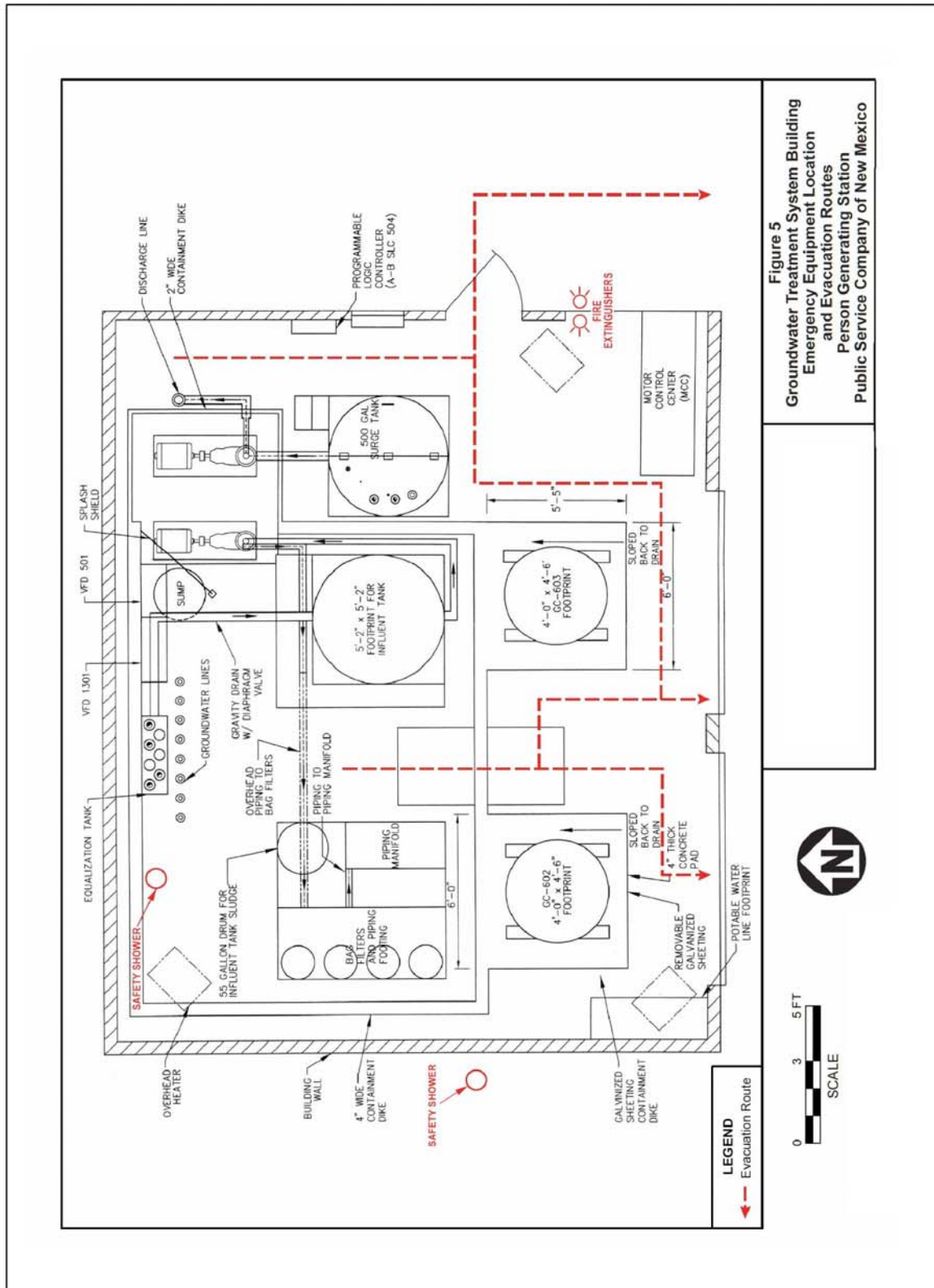
PERMIT ATTACHMENT E – FIGURES

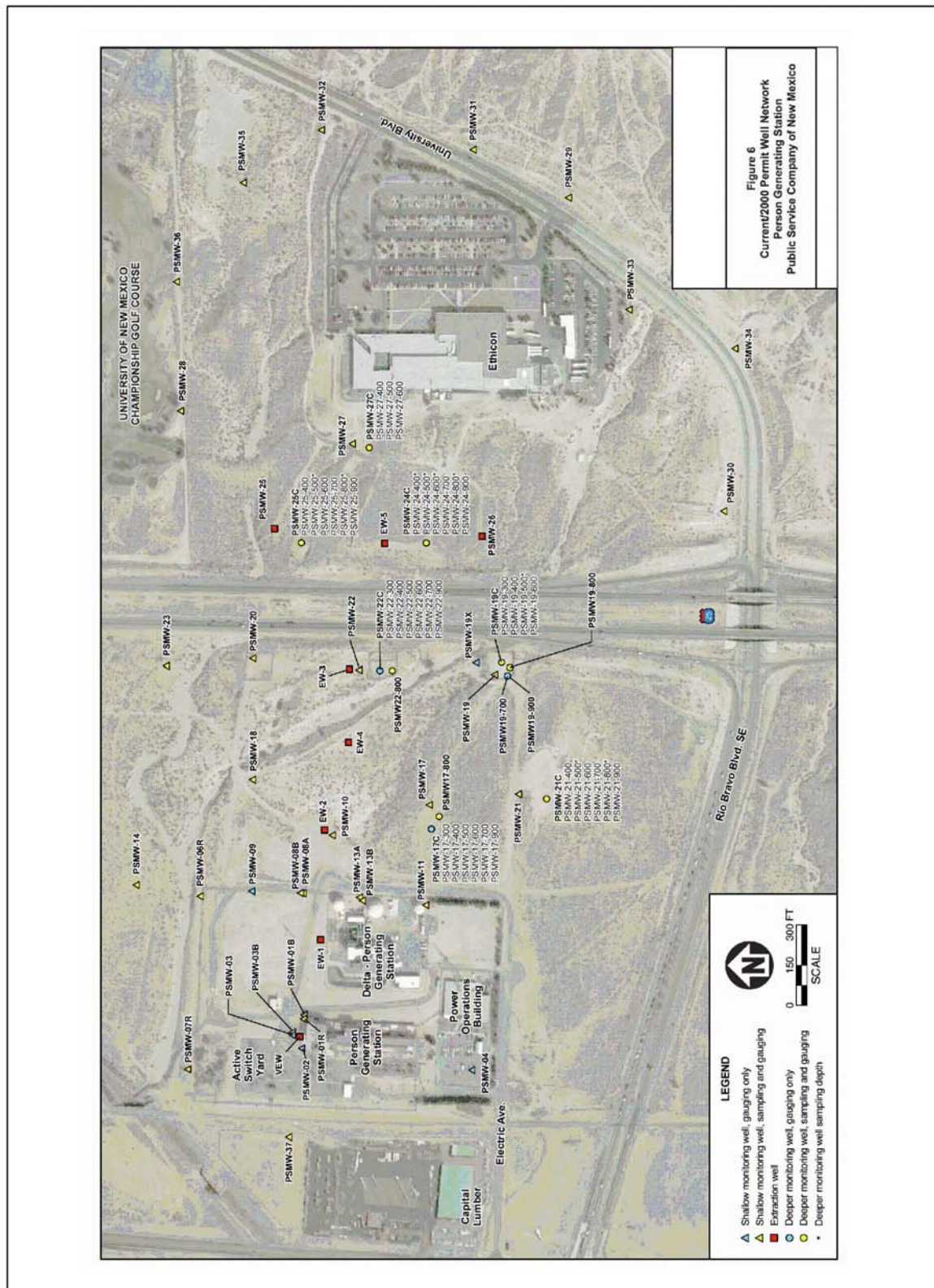


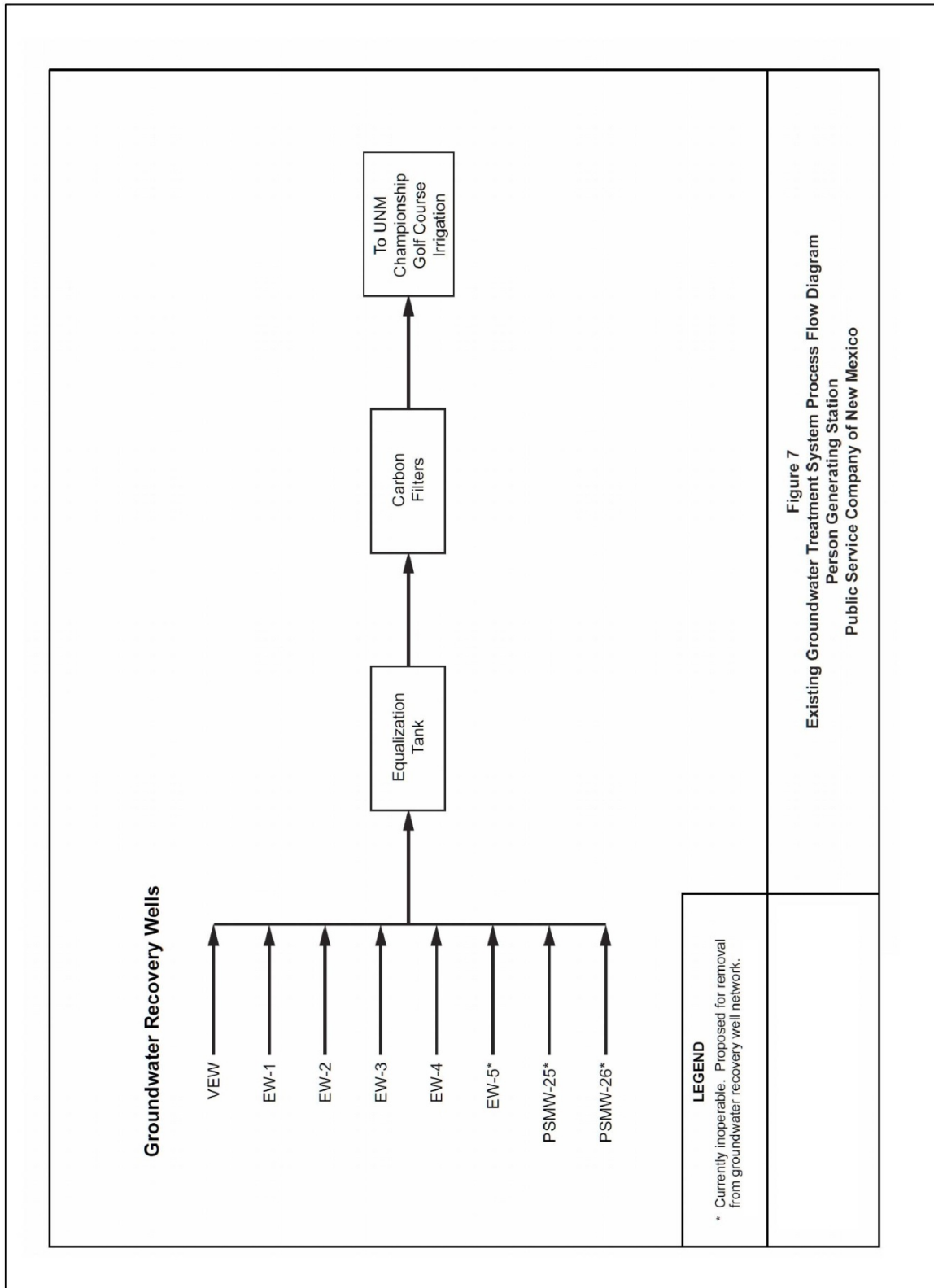


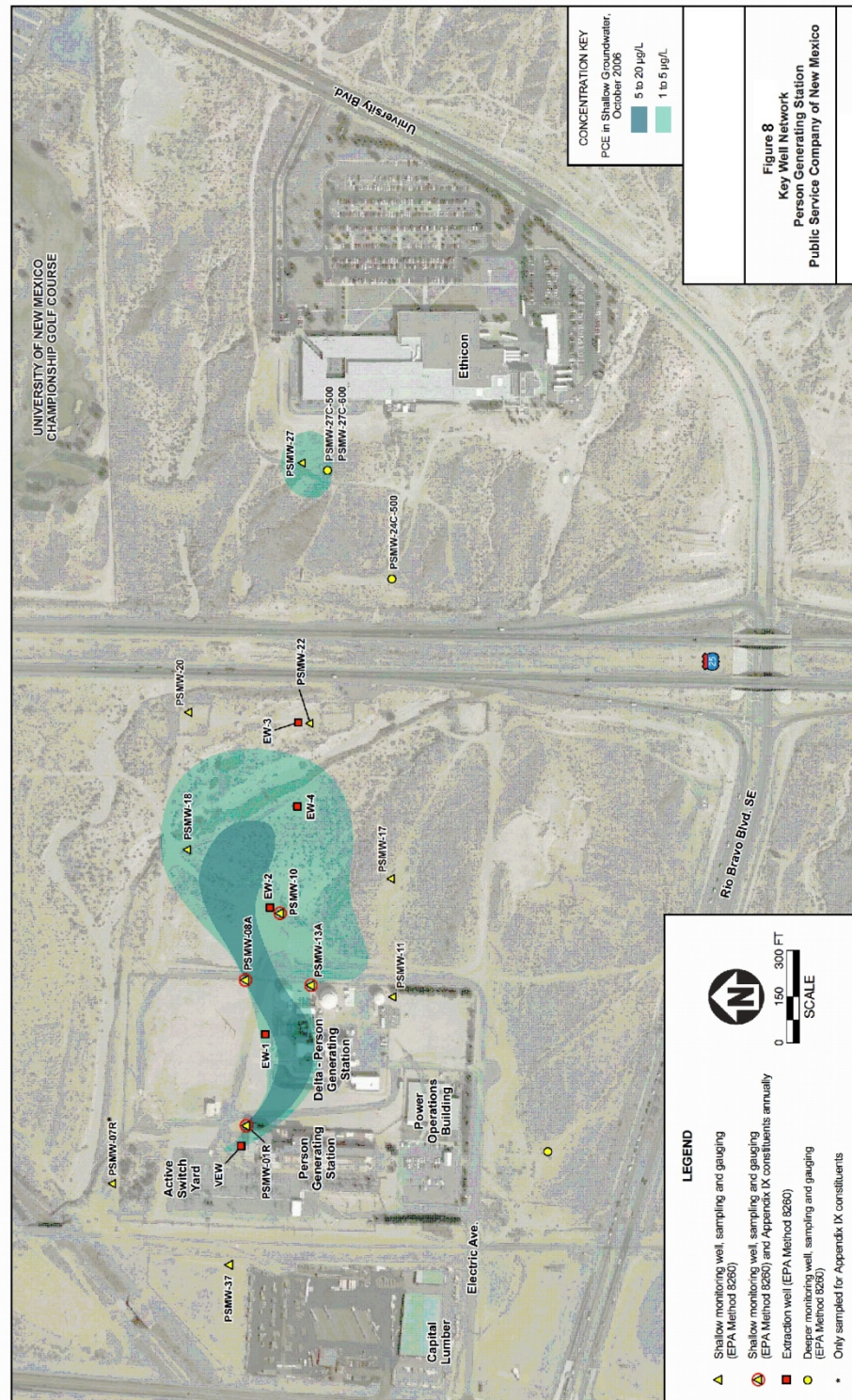


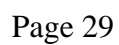












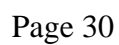




Photo E-11
Groundwater Treatment System, Carbon Unit

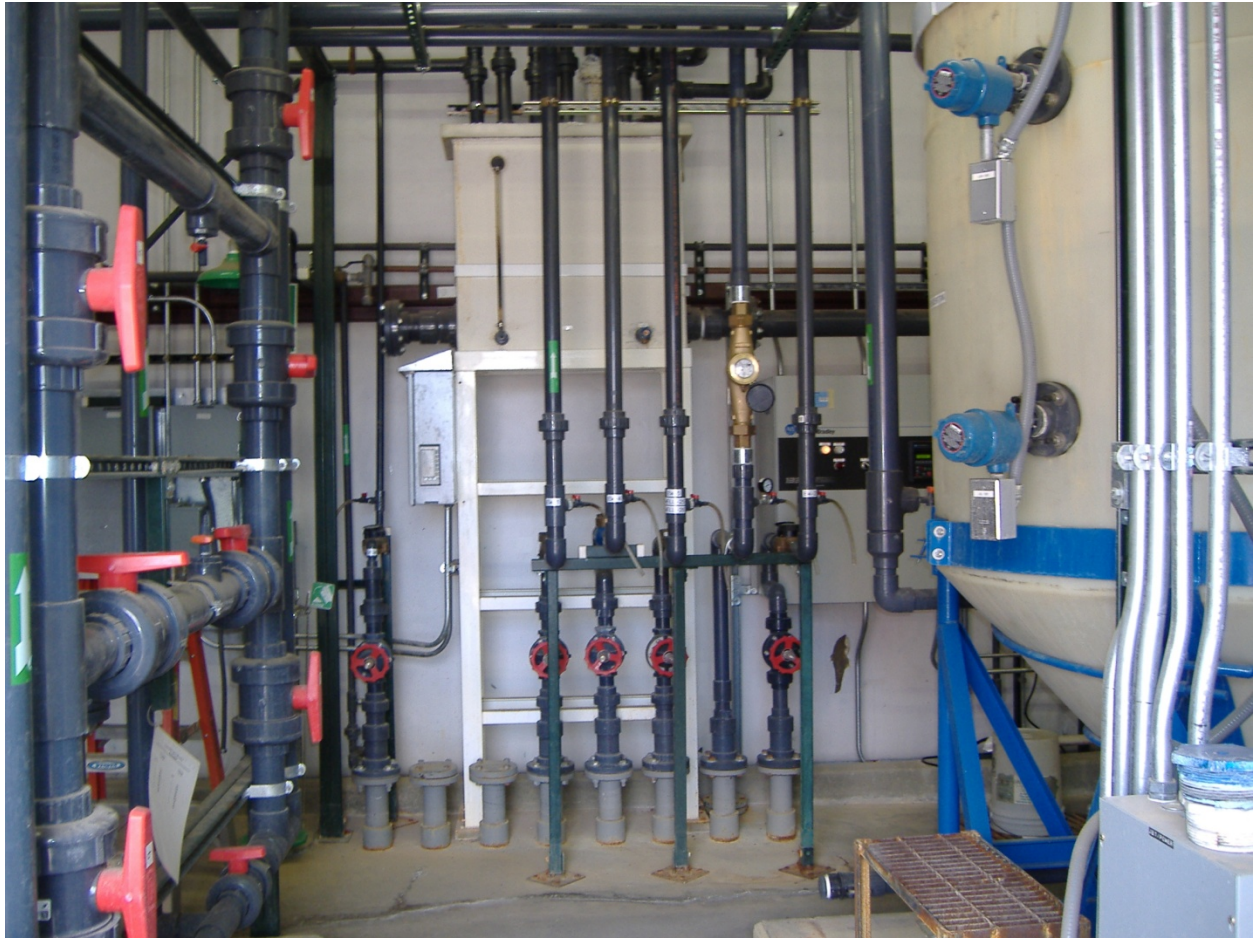


Photo E-12
Groundwater Treatment System, Influent Pipes

PERMIT ATTACHMENT F - COMPLIANCE SCHEDULE

F.1 COMPLIANCE SCHEDULE

This Compliance Schedule (Table F-1) briefly lists particular requirements, in chronological order of submittal, specified in the Permit and their associated due dates. The complete requirements are found in the referenced Permit Sections.

TABLE F-1
Compliance Schedule

Permit Section	Requirement	Due Date
Submittals Due After Permit Issuance		
2.7.3	Revised Post-Closure Care Estimate	Within 60 days of the effective date of this Permit
3.4	Schedule for Plug and Abandonment of Monitor Wells Not Required for Network	Within 90 days of the effective date of this Permit
Semi-Annual Submittals		
2.3.10	Semi-Annual Post-Closure Care Reports	June and December of each calendar year.
Other Submittals		
2.3.9	Biennial Report	March 1 st of each even numbered year
2.3.7	Final Post-Closure Care Report	Within 60 days of the conclusion of Post-Closure Care
1.7.5	Permit Re-Application	At least 180 days prior to the expiration of this Permit