PNM 2000

Cole

State of New Mexico
ENVIRONMENT DEPARTMENT
Ground Water Quality Bureau
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
(505) 827-2918 phone
(505) 827-2965 fax

E. JOHNSON
OVERNOR

PETER MAGGIORE
Secretary
PAUL R. RITZMA
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 11, 2000

Mr. Patrick Goodman, Vice President
Public Service Company of New Mexico
Alvarado Square - 96E0
Albuquerque, NM 87158

RE: Additional Information Request for Discharge Plan Renewal, Person Generating Station — UNM Golf Course, DP-1006

Dear Mr. Goodman:

The New Mexico Environment Department (NMED) Ground Water Quality Bureau (GWQB) received your application for discharge plan renewal on June 30, 2000 for the discharge of up to 288,000 gallons per day (gpd) of remediated ground water from the abandoned Person Generating Station to the UNM South Golf Course. In accordance with New Mexico Water Quality Control Commission (WQCC) Regulation 3108, NMED reviewed the application for discharge plan renewal and has determined that the application is administratively complete. A public notice for your discharge plan was published August 10, 2000. NMED has determined that the following additional information is necessary for NMED to continue technical review of your application. Please address the following issues so that NMED can continue processing of your renewal in accordance with WQCC Regulations 3107 and 3109.A.

1. Please confirm the following language to describe the wastewater disposal system for DP-690:

   The Person Generating Station Ground Water Treatment System (GWTS) is briefly described as follows:

   > Public Service Company of New Mexico (PNM) will discharge up to 288,000 gpd of treated ground water recovered from extraction wells at the abandoned Person Generating Station. The ground water, contaminated with 1,1,2,2-tetrachloroethylene (PCE), 1,1-dichloroethylene (1,1-DCE), and 1,1,1-trichloroethane (1,1,1-TCA), is treated using an air stripper and carbon adsorption. Treated water is pumped to the UNM South Golf Course and discharged to two

synthetically-lined irrigation storage lagoons located on the golf course. Treated water from Person Generating Station is commingled with irrigation water and constitutes between 5 and 10 percent of the water stored in the lagoons. Ground water below the site is at a depth of approximately 265 feet and has a total dissolved solids concentration of approximately 250 milligrams per liter.

2. NMED requires a more detailed *Operation Plan* for your facility as required by the Water Quality Control Commission (WQCC) Regulations 1202, 3106 and 3109.E.1. Please augment the operation plan to include the following:

   A. PNM will inject sulfuric acid into the influent stream in amounts sufficient to prevent mineral precipitation in the air stripper and/or the granular activated charcoal units. Acid injection will be adjusted to maintain an effluent pH range of 6.0 to 9.0.

   B. 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.

2. NMED requires a more detailed *Monitoring Plan* for your facility as required by WQCC Regulations 3106 and 3107. Please augment the monitoring plan to include the following:

   A. PNM will monitor and report as follows:

      1. Record monthly effluent volumes discharged to the golf course using a totalizing flow meter, which is located by the surge tank in the GWTS building. Records will be submitted with the quarterly reports.

      2. On a monthly basis, PNM will monitor the influent, effluent, and the two irrigation lagoons at the UNM South Golf Course for the chlorinated volatile organic compounds listed above using EPA Method 8021 or an equivalent method.

      3. PNM will analyze the effluent monthly for sulfate and daily for pH.

      4. Quarterly reports of discharge volumes, influent, effluent, and lagoon analyses will be submitted to the GWQB by February 15, May 15, August 15, and November 15 of each year. PNM will copy monitor reports to Carl Will, NMED Hazardous Waste Bureau (HWB).

3. NMED requires a more detailed *Contingency Plan* for your facility as required by WQCC Regulations 3107 and 3109. Please augment the contingency plan to include the following:

   A. PNM will shut down the recovery wells, the treatment system, and flow to the golf course, if any portion of the treatment system fails to decrease contaminant concentrations to equal or less than the Ground Water Standards listed in WQCC Regulation 3103 and/or if any portion of the delivery system fails to supply effluent

to the golf course.

B. Upon a spill or failure of the treatment/delivery system, PNM will submit the information required by WQCC Regulation 1203 as prescribed, including a corrective action plan to mitigate any damage caused by the spill.

4. NMED requires a more detailed *Closure Plan* for your facility as required by WQCC Regulations 3107 and 3109. Please augment the closure plan to include the following:

A. After cessation of operations PNM will close the GWTS as follows:

1. Abandon in place the influent pipelines from the extraction wells to the GWTS, and the effluent pipeline from the GWTS to the golf course pond.

2. If required by HWB, the extraction wells will be converted to monitoring wells, otherwise they will be plugged and abandoned, with prior GWQB approval, in accordance with the NMED Monitoring Well Construction and Abandonment Guidelines (copy enclosed).

5. NMED requires a complete **Ground Water Discharge Permit Application Form** for your facility as required by WQCC Regulation 3106.C. Please submit the following information not included in your existing application:

A. Location Information — No. 8. Location of any water supply wells, injection wells, seeps, springs, bodies of water or water courses within one mile of the outside perimeter of the discharge site. Figure 1 of your renewal application is dated May 31, 1994. Please update the map with current information, including the location of the new water supply well for the Delta-Person Generating Station.

If you have any questions, I can be reached at (505) 827-0018. I look forward to working with you on the modification of your plan.

Sincerely,

Susan von Gonten

Susan von Gonten, Environmental Scientist
Ground Water Pollution Prevention Section

Enclosures: NMED Monitoring Well Construction and Abandonment Guidelines

xc: L. William Bartels, Dist. Manager, NMED Dist. 1
NMED Albuquerque Field Office
Paul Saavedra, Office of the State Engineer
Carl Will, NMED-HRMB
John Hale, Env. Engineer, PNM, Alvarado Square - 2104, Albuquerque, NM 87158