

**ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

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In Re:)		
)		
Four Corners Power Plant)	NPDES Appeal No. 19-06	
NPDES Renewal Permit: NN0000019)		
Arizona Public Service Company (Permittee))		
)		
)		

**ARIZONA PUBLIC SERVICE COMPANY'S RESPONSE TO
PETITION FOR REVIEW**

ATTACHMENT 7



October 5, 2005

VIA OVERNIGHT MAIL

Mr. Doug Eberhardt, Chief
Permits Issuance Section
U.S. EPA, Region IX, W-5-1
75 Hawthorne Street
San Francisco, California 94105-3901

RE: NPDES Permit Renewal Application #NM0000019

Dear Mr. Eberhardt:

Arizona Public Service Company (APS) as co-owner and operator of the Four Corners Steam Electric Station near Fruitland, New Mexico, (Four Corners Power Plant) submits this letter and the attached documents as part of the National Pollution Discharge Elimination System (NPDES) permit renewal application. This renewal application is made pursuant to 40 CFR Part 122.

The application does not include analyses for three volatile, organic compounds: acrolein, 2-chloroethylvinyl ether, and Bis (Chloromethyl) Ether. The laboratory contracted for analysis failed to run these parameters with the samples submitted and, as discussed previously with EPA, APS did not wish to delay reapplication to accommodate resampling and analysis. APS will collect additional samples and have them analyzed promptly so the analytical results may be forwarded to you during your review period.

Mr. Carl Woolfolk, Four Corners Power Plant Environmental Supervisor, contacted Mr. Eugene Bromley of your staff, to discuss the missing data for the permit re-application. Mr. Bromley advised APS to submit the available data and forward the missing results once they are received. APS has requested expedited service from the laboratory to minimize the delays in completing the renewal application.

The current NPDES permit for the Four Corners Power Plant became effective on April 7, 2001, and is expiring on April 6, 2006. APS is applying for authorization to continue discharging from the following Outfalls:

001 Cooling Pond Discharge to unnamed wash tributary to Chaco Wash

Internal Outfalls:

- 01A Condenser Cooling Water Discharge
- 01E Combined Waste Treatment Pond Discharge
- 01B Chemical Metal Cleaning Wastewater Discharge

APS has enclosed a copy of the present Four Corners Power Plant NPDES Permit, to assure your files are complete. No substantial changes are being requested and we are proposing re-issuance of this permit. APS is hopeful this will expedite the NPDES permit renewal.

ADDITIONAL INFORMATION

Analytical data for 01B is not included in Form 2C. Outfall 01B, Chemical Metal Cleaning Wastewater, is not being used. Four Corners currently co-disposes chemical metal cleaning wastewater with fly ash and scrubber sludge, as allowed by the RCRA Dietrich exemption. This Outfall must be retained, however, in case the ability to co-dispose with coal combustion byproducts is eliminated by future rule-

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making. Because the boilers are chemically cleaned infrequently recent analytic data is not available for chemical metal cleaning wastewater.

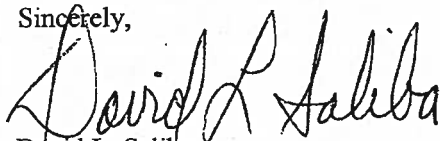
Additionally, in order to discharge chemical metal cleaning wastewater, treatment would be necessary to meet effluent limitations. Therefore, analysis of chemical metal cleaning wastewater before treatment would not be meaningful.

APS requests EPA's consideration in using EPA method 330.5 for the determination of total residual chlorine instead of the amperometric methods. We are making this request because the distance between the sampling point and laboratory analyzer is large, which makes it difficult to collect and analyze the sample within 15 minutes per standard methods requirements. Additionally, this requirement does not allow for other parameters to be analyzed at the same time and location. As evidenced by all previous data submitted, effluent toxicity has not been observed at the Four Corners outfalls. APS is requesting that EPA allow the continued annual biomonitoring as presently allowed in the facility's NPDES permit.

As you are aware, APS continues to collect impingement data at all five cooling water intake structures in conformance with the Proposal for Information Collection (PIC) submitted in April 2005. As part of the PIC submittal APS requested a three and one half year extension for submittal of the Comprehensive Demonstration Study in compliance with the 316(b) rule. We are requesting that the allowance for the extension be documented in the renewed facility NPDES permit.

If you have any questions concerning this application, please contact Winston Benally or Carl Woolfolk, Environmental Services at (505) 598-8448 or (505) 598-8799, respectively. APS requests the opportunity to work with you on changes that may be made to the permit.

Sincerely,



David L. Saliba
Fossil Plant Manager

RG/CDW/WB/jmd

Enclosure

C5531/05-009-001.8

bcc:	Winston Benally	4915
	David. Saliba	4900
	Env File	4915

xc: Patrick Antonio NNEPA