

CONFIDENTIAL

PUBLIC SERVICE COMPANY OF NEW MEXICO
ALVARADO SQUARE ALBUQUERQUE, NEW MEXICO

December 9, 1983

Mr. Anthony Drypolcher
Acting Bureau Chief
Groundwater and Hazardous
Waste Bureau
New Mexico Environmental
Improvemental Division
Post Office Box 968
Santa Fe, NM 87504-0968

Dear Mr. Drypolcher:

Subject: Public Service Company of
New Mexico-Person Generating
Station-EPA ID NMT360010342

Public Service Company of New Mexico (PNM) acknowledges its receipt on November 16, 1983 of your letter dated November 9, 1983 concerning Person Generating Station. We appreciate the opportunity to discuss areas of mutual concern in your office on Monday, December 12, 1983 at 9:30 am.

PNM may question some of the specific conclusions which form the basis of your letter. Nevertheless PNM is taking action and intends to cooperate with the New Mexico Environmental Improvement Division (NMEID).

This letter will present the course of action PNM is taking with respect to the subsurface tank.

INVESTIGATION & FEASIBILITY STUDY

PNM is conducting an Investigation and Feasibility Study of this site to determine what, if any, cleanup may be necessary. This investigation should help to determine the following:

1. The extent of any contaminated soil and the approximate volume involved.
2. A determination of whether continued movement of this spilled material is to be expected.
3. An analysis of anticipated environmental impact.
4. A review of remedial action alternatives available to treat any contaminated soil in the most environmentally acceptable and cost effective manner.

Attached for your information is PNM's current schedule for baseline data collection (Attachment 1).

BACKGROUND DISCUSSION

A subsurface tank was constructed at Person Generating Station to collect waste oils and solvents which resulted from the cleaning of motors and other equipment used at this generating facility. Construction of the tank is believed to have occurred in July 1976. Initial use of the facility is believed to have occurred at approximately the same time. The solvents used at this location until Spring 1979 included kerosene, stoddard solvent and a water-trisodium phosphate mix used for steam cleaning. In Spring 1979, the use of Dowclene*EC was begun. Dowclene*EC, a product of the Dow Chemical Company, is a generic solvent based on two active ingredients, 1,1,1, Trichloroethane (75%) [TCA] and Tetrachloroethylene (25%) [PCE]. During Spring and early Summer, 1980, repainting of equipment at Person Generating Station occurred. The painting equipment was cleaned in the area serviced by the tank. It is believed that waste paints, paint thinners, and turpentine were collected in the tank during this time period. Periodically this tank was pumped of its contents by various waste oil reclaimers for the purpose of recycling at another location.

Use of the tank continued until October 13, 1983 when it was discovered that some of its contents had leaked into the ground.

When it was discovered that the tank was leaking, PNM ceased its use and notified both NMEID and the U.S. Environmental Protection Agency (EPA) that a "spill" of potentially hazardous material had been discovered. Thus the spill was discovered October 13, 1983 and notification of both agencies occurred on that same date. Subsequent to those notifications PNM began its investigation into the extent of the spill. The results of this investigation to date are as follows:

1. The material spilled include Dowclene*EC, wastewater, oils and greases, paint solids and turpentine.
2. Traces of a major ingredient of Dowclene*EC, in the form of PCE have been measured at a depth of 90 feet below the surface (Attachment 2). This material has subsequently been selected as a tracer for any future sampling to be conducted.
3. Analyses of 1,1,1, Trichloroethane, the other major ingredient in Dowclene*EC have been measured nearer to the surface and in smaller amounts (Attachment 3).
4. Analyses of the material removed from the tank indicates that it does not meet any of the characteristics of a hazardous waste as listed in HWMR (Attachment 4).
5. Due to removal of liquid head and the observed soil properties, the material is not expected to move either radially or vertically. We are in the process of evaluating the extent of contamination in both the radial direction and vertical direction and the potential for further migration.

PNM does not believe that this spill has caused or will cause a hazard to human health or the environment. We recognize however, that your agency

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is obligated by statute and regulation to look into matters of this kind and we therefore invite and request NMEID support in our continued efforts to determine the extent of the spill.

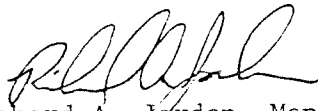
Appropriate action at this time is further investigation of alternatives available for the control and/or treatment of such spills in the most environmentally conscious and cost effective manner. NMEID assistance in defining what amount of cleanup would normally be required for similar spills of pure products would be appreciated. Should NMEID have knowledge of cost effective cleanup alternatives employed for such spills, PNM would appreciate this information also.

CONCLUSION

PNM has made every effort to comply with both Resource Conservation and Recovery Act (RCRA) and New Mexico Hazardous Waste Management Regulation NM HWMR). We believe our compliance record demonstrates our commitment to abide by these laws. PNM has presented the facts as we understand them. We have also provided a course of action to determine what responsible future action will be required concerning the spilled material at Person Generating Station. Your concurrence and support in this matter would be appreciated.

We are looking forward to discussing this matter with you and your staff on Monday, December 12, 1983.

Sincerely,



Richard A. Jordan, Manager
Regulatory Licensing & Compliance

RAJ/HLP:cam
xc: Jack Rex

BASELINE DATA COLLECTION
FOR

ATTACHMENT 1

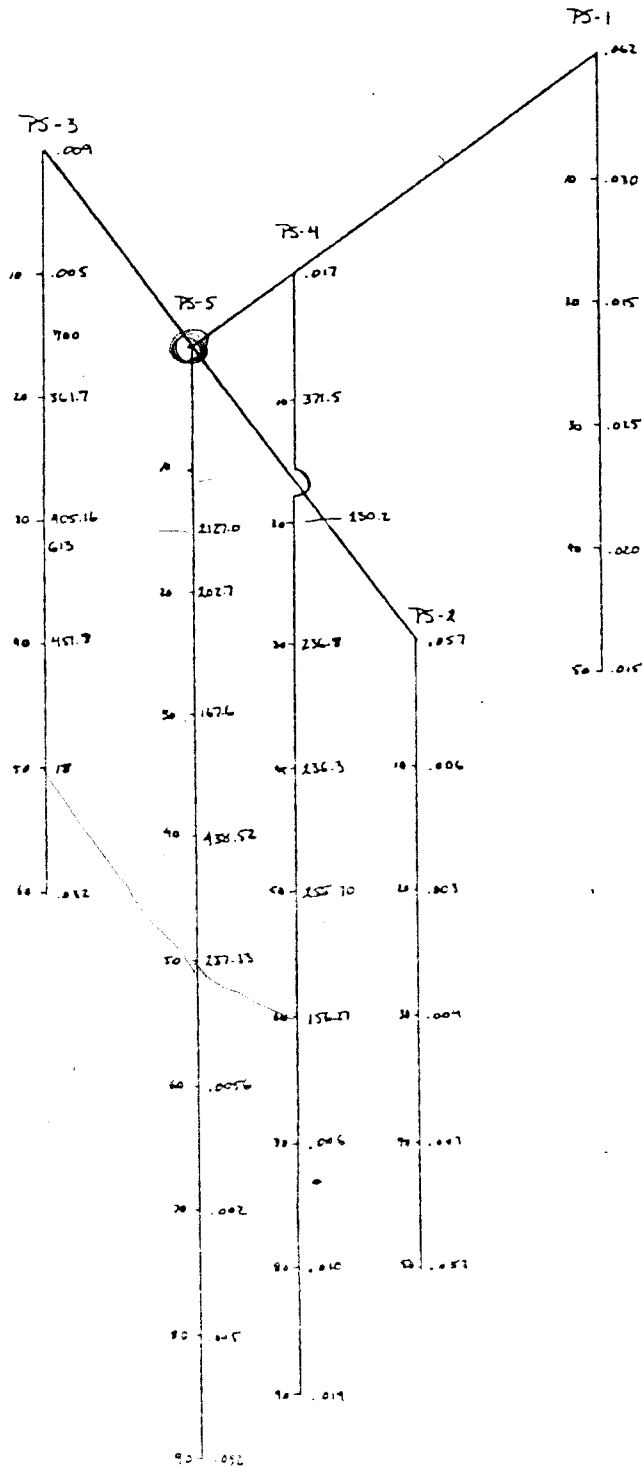
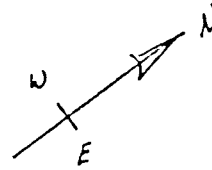
PERSON GENERATING STATION

DESCRIPTION	DURATION				
	NOVEMBER 1983	DECEMBER 1983	JANUARY 1984	FEBRUARY 1984	MARCH 1984
Additional 5 holes	-----*				
Analysis of Data	-----*				
Additional 7 holes		*-----*			
Analysis of Data		*-----*			
Additional holes if required			*-----*		
Site Analysis			*-----*		
Field/Assessment	-----*				
Water Flow Pattern Analysis	-----*				
Summary Report			X X		
Final Report					X

ATTACHMENT 2

PERSON GENERATING STATION
 CORE BORING ANALYSES
 (THM - PERCHLOROETHYLENE (PCE))
 SCALE: 1" = 10'

1020



DISTANCE OF CASING FROM CENTER
 OF EXPOSED TANK AND COMPASS DIRECTIONS:

- TS-1 = 20' N
- TS-2 = 15' E
- TS-3 = 10' W
- TS-4 = 5' N
- TS-5 = 0'

ATTACHMENT 3

RESULTS OF ANALYSES
FOR
1,1,1, TRICHLOROETHANE

Tank liquid	17,274 ppm
15'	462.2 ppm

5051 845 8884
 7009 Jefferson St. NE
 Albuquerque, NM 87109

Analytical and Environmental Services

AnaCor
 Laboratories

To: PNM
 Alvarado Square
 Albuquerque, NM 87158

Date: 2 December 1983
 1275

Attention: Jody Plum

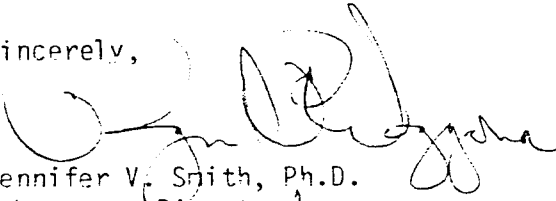
Sample Identification : Person Tank Sample

Analyte	Analytical Results	Normal Detection Limit
Corrosivity	Non-Corrosive	
Ignitability	36 °C	0.1 °C
Reactivity	Non-Reactive	
Toxicity:		
As	<0.002 ppm	0.002 mg/l
Ba	0.27 ppm	0.005 mg/l
Cd	0.08 ppm	0.002 mg/l
Cr	0.72 ppm	0.005 mg/l
Pb	5.51 ppm	0.001 mg/l
Hg	<0.002 ppm	0.002 mg/l
Se	<0.002 ppm	0.002 mg/l
Aq	<0.003 ppm	0.003 mg/l
Endrin	ND *	0.1 mg/l
Lindane	ND *	0.1 mg/l
Methoxychlor	ND *	0.1 mg/l
Toxaphene	ND *	0.1 mg/l
2,4-D	ND *	0.1 mg/l
2,4,5-TP Silvex	ND *	0.1 mg/l

*ND= None Detected
 Reference: 40 CFR, Part 261

An invoice for services is enclosed. Thank you for your consideration in contacting AnaCor Laboratories.

Sincerely,


 Jennifer V. Smith, Ph.D.
 Laboratory Director

Enclosure