

G. L. Hubbard

STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION
P.O. Box 968, Santa Fe, New Mexico 87504-0968
(505) 984-0020

DENISE FORT, DIRECTOR

SEPTEMBER 13, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jody Plum
Public Service Company
of New Mexico
Alvarado Square
Albuquerque, NM 87158

Dear Mr. Plum:

Following are comments pursuant to the September 5, 1984 meeting between PNM and EID.

1. In order to close out the July 23, 1984 Notice of Violation we must receive a closure plan, as well as a ground water corrective action program, by September 27, 1984. As discussed at the meeting, the closure plan may delineate the various options to be considered, and the studies you are proposing, without committing to one particular option at this time. Please do address closure plan requirements to the extent possible, e.g., estimate of maximum extent and inventory, anticipated date of closure, decontamination of equipment, and so forth.
2. EID will accept your Part A application on September 27, 1984. We will then call in your Part B application, probably with a due date in May, 1985. Any remedial activities which would require a permit can be included in the Part B.
3. Regarding your preliminary proposal for "Phase V":
 - a. Task 2, Field Study for Preliminary Definition of Aquifer Properties. Prior to performance of this task, EID requests full detail on what is to be included in the study and what procedures will be followed. PNM raised the question of what could be done with the water from this study. A temporary permit for tank storage appears feasible; the City of Albuquerque may also accept a limited quantity of the water into their sewage system.
 - b. Task 3. Well Cluster at Downgradient Property Line and Sampling. The plan you submit should clarify that wells may need to be drilled in several locations, depending on results from each well. We request that you maintain frequent communication with us regarding your results and proposed well locations. We also request that you include in this task an upgradient

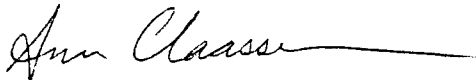
Mr. Jody Plum
September 12, 1984
Page -2-

well cluster - e.g., at your property line west of the "tank"
- to help determine the extent of the plume in that direction.

- c. Task 7A. Model Run with New Data. This task should include drilling and sampling of more wells to verify the model results. Placement of the wells should be such as to ascertain that the plume is no larger than indicated by the model.
- d. Task 9B. Begin Continual Pumping of Monitor Wells in Tank Area and Treat Water. Your plan should include a proposal for disposition of the pumped water until a suitable treatment method is agreed on.
- e. Task 12. Full-Scale Pump Test for Aquifer Properties. It not clear from the preliminary schedule when this will be drilled. As for other activities, we request full detail on the well specifications and test procedures before drilling.

Thank you for giving us an opportunity to review your preliminary schedule. We look forward to your full submittal. If you have any questions regarding this letter, please contact me at 984-0020, Ext. 340.

Sincerely,



Ann Claassen
Water Resource Specialist
Hazardous Waste Section

AC/clm

cc: Joel Hubbell, Ground Water Section ✓