

*Mojave*

**PNM** PUBLIC SERVICE COMPANY OF NEW MEXICO

ALVARADO SQUARE ALBUQUERQUE, NEW MEXICO 87158

May 1, 1985

Mr. Peter Pache, Program Manager  
Hazardous Waste Section  
New Mexico Environmental  
Improvement Division  
Post Office Box 968  
Santa Fe, NM 87504-0968

RECEIVED

MAY 01 1985

HAZARDOUS WASTE SECTION

Dear Mr. Pache:

Subject: Public Service Company of New  
Mexico--Phase V Groundwater  
Investigations for Person  
Generating Station: Revised  
Schedule (May 1, 1985)

In response to comments listed in your letter of April 3, 1985, regarding the subject project, Public Service Company of New Mexico (PNM) has revised the Phase V schedule to incorporate activities that will address these comments. An outline of future work and schedule of tasks is enclosed. As specific methodologies for particular tasks (e.g., full-scale pump test) are developed, you will be provided with the details for review. It is possible that some of the remaining tasks may be modified, or new tasks added, as work proceeds on Phase V. For example, if installation of additional monitor wells for plume definition or refinement of remedial action planning would be needed, this would affect the Phase V schedule as currently revised. If the need for such future revisions to Phase V occurs, you will be notified and a request for revisions will be submitted.

If you have any questions or comments concerning the enclosed information, please call me at 848-2014.

*[Signature]*  
Sincerely,

R. L. Plum  
Regulatory Coordinator

KK:wp  
Enclosures

PHASE V (Revised May 1, 1985)

Definition of Groundwater Contamination  
and Preliminary Design of Remedial  
Actions at Person Generating Station

An initial outline of 16 tasks for Phase V was submitted to the NMEID on September 24, 1984. A revised schedule was subsequently submitted on November 19, 1984. Through April 12, 1985, tasks 1 through 8 have been completed. Task 8 was preparation of a Phase V status report and evaluation of future work options. Based on results of site investigations and comments from the NMEID, the remaining Phase V tasks have been modified to include additional work to provide more detail on extent of groundwater contamination and to perform a full-scale aquifer test. The modifications include deletion of Tasks 9A, 9B, 10, 11, and addition of Tasks 13A.1, 13B.1, and 17.

The Phase V schedule as revised May 1, 1985 (attached) incorporates these most recent revisions. As work on the remainder (i.e., Tasks 9 through 17) of Phase V continues, it is again possible that additional revisions may be necessary if the tasks do not adequately meet their intended objectives. Any such changes would again be made only after discussion with the NMEID. A description of tasks remaining for Phase V as revised May 1, 1985 follows:

Task 9A. Obtain NMEID Approval for 9B, and Obtain Permission for Water Disposal

As originally scheduled in September 1984, a task (i.e., 9B) was outlined for continued pumping of one or more of the monitoring wells near the waste tank. This task was identified as a possible early remedial action step. However, pump testing of these wells and model calculations indicate that such pumping would remove only a small percentage of the contaminants. Thus, this task of continued pumping of monitoring wells has been cancelled.

Task 9B. Begin Continual Pumping of Monitor Wells in Tank Area and Treat Water

Task cancelled for reasons described for Task 9A.

Task 10. Pilot Treatment for Task 9B

Task cancelled for reasons described for Task 9A.

Task 11. Meeting With NMEID on Progress of Tasks 9B and 10

Task cancelled for reasons described for Task 9A.

Task 12. Full-scale Pumping Testing for Aquifer Properties

To better define saturated hydraulic conductivity and storativity, an aquifer pump test will be performed. New

well installations will be required, and drawdown will be measured in an observation well. Exact details on this task will be developed by the contractor and presented to NMEID prior to initiation of this task.

Results of Task 17 (Soil Gas Sampling) will be used to help establish the location for the pump test. Performance of Task 12 will require obtaining an approved plan for disposal of the pump test water and will require NMEID concurrence on the pump test field techniques and data analysis methodologies. An interim progress report of results will be sent to the NMEID.

Task 13A. Develop Preliminary Design of Remedial Options and Costs for Groundwater

As information is developed during other activities, various remedial action plans will be conceptually designed and evaluated. This task will be performed concurrently with other project activities. The end result will be a recommended remedial action for groundwater.

Task 13A.1. Oral Status Report to NMEID on Task 13A

A meeting will be arranged so that PNM and NMEID can discuss interim progress on Task 13A (Groundwater Remedial Options) before a final option is chosen.

Task 13B. Develop Preliminary Design of Remedial Options and Cost For Soil

The contractor will also assist PNM in evaluating options and selecting a proposed plan for handling the soil contamination existing at the site.

Task 13B.1. Written Submittal to NMEID on Task 13B

The various remedial actions for handling soil contamination will be discussed and evaluated in a written submittal to NMEID. This submittal will discuss interim progress on Task 13B (Soil Remedial Options).

Task 13C. Develop Acceptance Criteria for Remedial Actions

An important factor affecting final completion of Tasks 13A and 13B will be a definition of what entails a successful remedial action. Thus, this task will evaluate various criteria that could be used to describe a successful remedial action, and will select the most appropriate criteria for the groundwater and soil remedial actions.

- Task 14. Model Run With New Data (if needed)  
Results of Tasks 12 (Pump Test) and 17 (Soil Gas Sampling) will help evaluate the need for, and level of, additional modelling. Also, completion of Task 13B (Remedial Action Conceptual Design for Groundwater) may involve additional modelling. The NMEID will be notified before extensive modelling work is begun.
- Task 15A. Report on Phase V Results and Submit to Management  
A report presenting results of Tasks 2 through 14 and 17 will be prepared. This report will include recommended remedial action plans. PNM management will review the action plans.
- Task 15B. Obtain Approval of Management on Remedial Actions  
The remedial actions will need approval by PNM management.
- Task 15C. Submittal of Phase V Report to NMEID  
The Phase V report will be submitted to NMEID for review and a meeting will be held to discuss the recommended remedial actions.
- Task 16. Obtain NMEID Approval on Remedial Actions  
Prior to initiating full-scale remedial actions, the approval of the NMEID will be required.
- Task 17. Soil Gas Sampling and Interpretation  
This field task will precede field Task 12 (Pump Test). Tracer Research Corporation will be contracted to perform soil gas sampling at the site in an attempt to better define the extent of groundwater contamination. The general sampling scheme will be presented to the NMEID prior to the field survey. An interim progress report of results will be sent to the NMEID.

**Phase V: Definition of Groundwater Contamination and  
Preliminary Design of Remedial Actions**

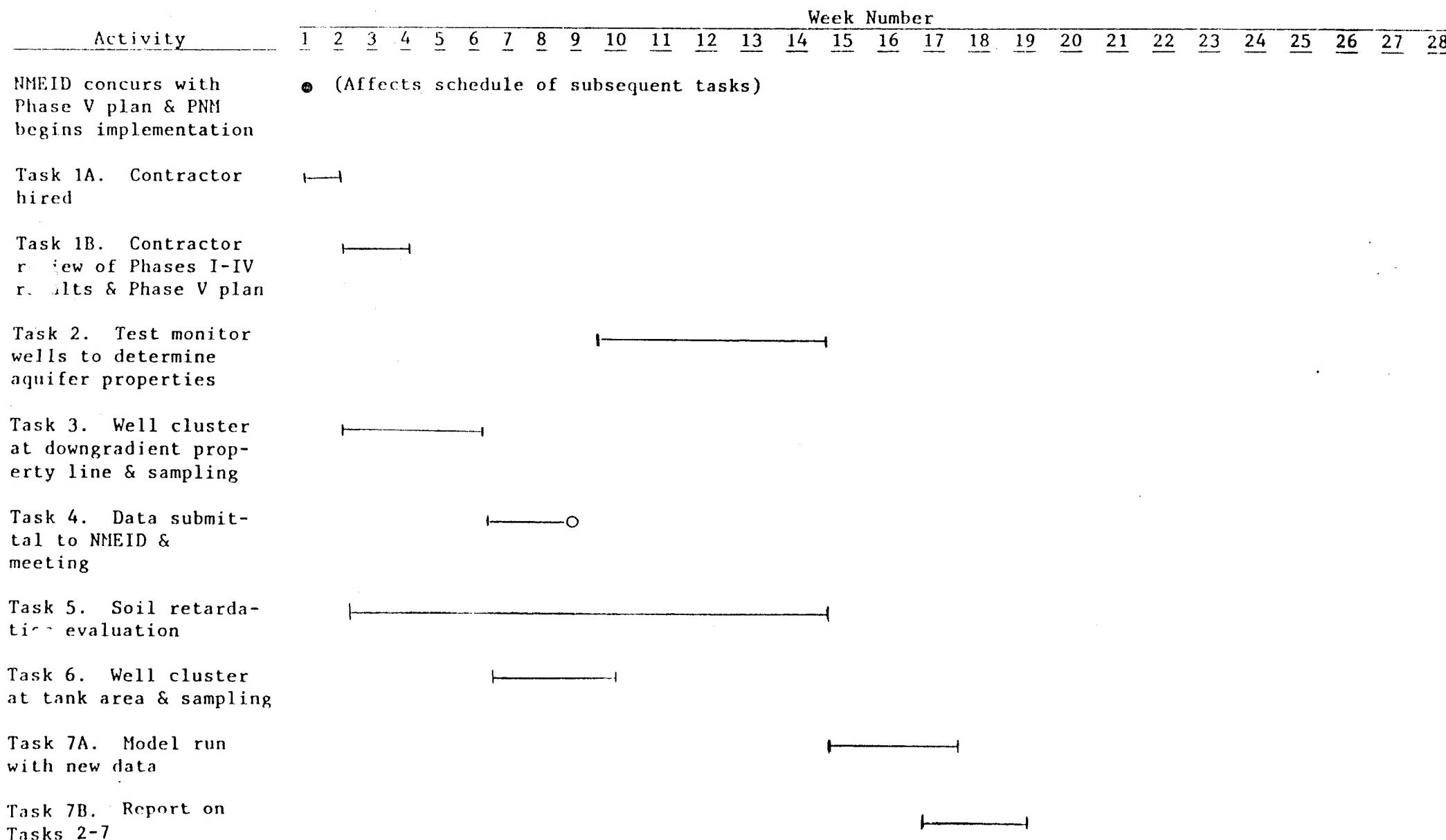
Activity	Week Number																						
	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51
Task 15B. Obtain approval of management on remedial actions																							
Task 15C. Submit Phase V report to NMEID																							
Task 16. Obtain NMEID approval on remedial actions																							
Phase VI. Begin implementation of remedial actions																							

(Affects Phase IV)---●

will not proceed until NMEID approves  
 Reevaluation point for PNM if data indicate unexpected problems

## Phase V: Definition of Groundwater Contamination and Preliminary Design of Remedial Actions

**Phase V: Definition of Groundwater Contamination and  
Preliminary Design of Remedial Actions**



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Activity	Week Number																												
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	
Task 8. Submittal of Task 7B report to NMEID & meeting																													
Task 9A. Obtain NMEID approval for 9B, and obtain permission for water disposal																													Task cancelled
Task 9B. Begin continual pumping of monitor wells in tank area																													Task cancelled
Task 10. Pilot treatment testing (if needed)--integrate with Task 9B																													Task cancelled
Task 11. Meeting with NMEID on progress of Tasks 9B & 10																													Task cancelled
Task 12. Full-scale pump test for aquifer properties																													Rescheduled--see next page
Task 13A. Develop preliminary design of remedial options & costs for groundwater																													>
Task 13B. Develop preliminary designs of remedial options & costs for soil																													>
Task 13C. Develop acceptance criteria for remedial actions																													Continues through week 45