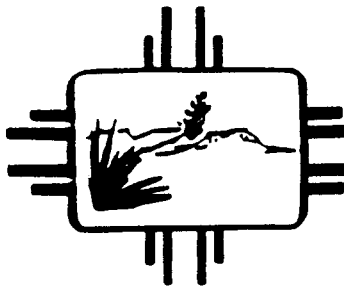


PNM 90



New Mexico Health and Environment Department

GARREY CARRUTHERS
Governor

DENNIS BOYD
Secretary

MICHAEL J. BURKHART
Deputy Secretary

RICHARD MITZELFELT
Director

September 19, 1990

Ms. Lawrie Chisholm
Manager, Environmental Services Department
Public Service Company of New Mexico
Alvarado Square
Albuquerque, NM 87158

RE: Person Generating Station
NMT360010342
Corrective Action

Dear Ms. Chisholm:

Enclosed please find a first draft of Scope of Work for Interim Measures at Person Generating Station, Public Service Company (PNM), Albuquerque, New Mexico. This document may become an enforceable document through an enforcement action in the near future.

We would like to meet with you within the next few weeks to discuss and negotiate the language of this document. Please contact Ms. Julie Wanslow at (505) 827-2928 to set up this meeting. In order to ensure a productive meeting, we would prefer that you submit written comments regarding this document prior to the meeting.

Sincerely,

Julie Wanslow

for Boyd Hamilton
Acting Supervisor
Enforcement and Inspection Section
Hazardous Waste Program

Enclosure

cc: Ron Johnson, PNM
Mickey Flowers, U.S. EPA (6H-HS)
Tracy Hughes, HED General Counsel
Dan Vigil, EID District 1

SCOPE OF WORK FOR INTERIM MEASURES (IM)
AT
PERSON GENERATING STATION
PUBLIC SERVICE COMPANY
ALBUQUERQUE, NEW MEXICO

A. **CORRECTIVE ACTIONS**

The Respondent shall undertake and complete each of the following actions to the satisfaction of the EID and in accordance with the terms, procedures and schedules which are set forth below.

1. Interim Measures - Groundwater Recovery and Disposition

a. Interim Measures Work Plan

(1) Draft Interim Measures Work Plan

No later than sixty (60) days after the effective date of this Order, the Respondent shall prepare and submit to EID for review and approval a Draft Interim Measures (IM) Work Plan which details the installation and operation of a recovery well network which prevents further migration of contaminants from the Public Service Company's (PNM) Equipment Wash Station, Below Grade Waste Oil Tank, and migration of contaminants beyond PNM's property boundary.

This recovery well network must be consistent with and integrated into any long term solution at the site.

This Work Plan shall contain detailed engineering drawings and designs, operation and maintenance requirements, construction plans, schedules for construction, monitoring, and implementation of the tasks described below.

EID shall review the Draft IM Work Plan and submit comments to the Respondent.

(2) Final Interim Measures Work Plan

Within sixty (60) days after receiving EID's

comments, the Respondent shall submit the Final IM Work Plan. The Final IM Work Plan shall be developed in final format and shall address to EID's satisfaction each of EID's comments received on the Draft IM Work Plan.

b. Implementation of Interim Measures

No later than sixty (60) days after receipt of EID approval of the Final IM Work Plan, the Respondent shall have installed and initiated operation of a recovery well network at the PNM. This interim recovery well network shall include the following:

- (1) Recovery wells shall be located at or near monitor wells PSMW-8A, PSMW-1, PSMW-2, PSMW-3, and between wells PSMW-8A and PSMW-6, and PSMW-8A and PSMW-5. These wells shall be located such that their capture zones prevent further migration of contaminants from the site.
- (2) The recovery wells and all site monitoring wells shall be monitored on a minimum bi-weekly basis for piezometric levels in order to provide data to detail the effectiveness of the recovery system.
- (3) The recovery wells shall be so designed and constructed as to allow sampling and flow measurement of each individual well.
- (4) The Respondent shall maintain continuous operation of the recovery system at the site.
- (5) The treatment and/or disposal of recovered waters under this provision shall be performed in compliance with all Federal, State, or local laws, regulations, permits, or ordinances. The groundwater must at least be treated to the EPA Drinking Water Standards, (see Table 1 of the RSI).

c. Interim Measure Reports

- (1) Draft IM Annual Report

Annually (every 365 days beginning with the effective date of this Order), the Respondent shall submit a report on the effectiveness of the recovery well system, detailing the present capture zone, projected capture zone, and what actions will be necessary to ensure efficient

capture zone characteristics at the site. Raw data, maps, contours, and graphs shall be included to graphically relate the data.

The Respondent shall propose schedules of installation of additional wells to EID for approval, should data indicate expansion of the recovery system is necessary.

EID shall review the report and submit comments to the Respondent.

(2) Final IM Annual Report

Within 30 days after receiving EID's comments, the Respondent shall submit the Final Annual Report. The Final Annual Report shall be developed in final format and shall address to EID's satisfaction each of EID's comments received on the Draft Annual Report.

Upon EID approval of the Final Annual Report, the Respondent shall initiate any actions described in the Final Annual Report.

(3) Monthly IM Progress Reports

By the first day of each month, the Respondent shall submit a progress report that detail the status of the Interim Measures and copies of any data generated during that time period.