

# PNM

**PUBLIC SERVICE COMPANY OF NEW MEXICO**

ALVARADO SQUARE ALBUQUERQUE, NEW MEXICO 87158

August 31, 1992

Certified Mail  
Return Receipt Requested

Ms. Teri Davis  
New Mexico Environment Department  
Hazardous and Radioactive Materials Bureau  
525 Camino de Los Marquez  
Santa Fe, NM 87502

Dear Ms. Davis:

Subject: Request To Modify Sampling and  
Analysis Plan For pH Requirements,  
Person Generating Station,  
NMT360010342

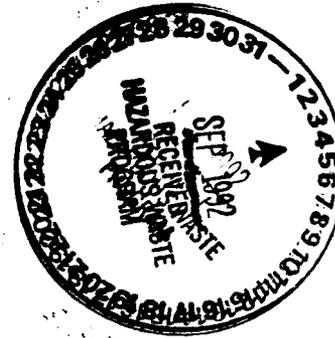
As follow up to our discussions during the recent Comprehensive Monitoring Evaluation conducted at Person Generating Station I would like to formally request a modification to the pH stabilization requirements in our Sampling and Analysis Plan (SAP).

Currently, the SAP requires a replication of ground water pH measurements to 0.01 pH unit before stabilization can be assumed to be achieved and well purging adequate. As we previously discussed, this is an overly stringent requirement for field measurements and one which exceeds even what is expected of laboratory equipment pursuant to the SW-846 Method 9040 standard.

The SW-846 Method 9040 standard (a copy is enclosed for your convenient reference) defines "drift-free" readings as readings within 0.1 pH unit of each other (See Sections 7.2 and 7.4). Also, for calibration using two buffers, the method only requires successive readings within 0.05 pH units of the buffer pH value (See Section 7.1.2).

Considering this, it is no surprise that we have seen some difficulty achieving stabilization of ground water values to 0.01 pH unit, as required by our SAP.

I would like, therefore, to request a modification to our SAP for the Person Generating Station ground water monitoring program. It is proposed that the SW-846 method be followed as written, i.e., pH meter calibrations using buffer standards shall be performed in a manner such that successive readings within 0.05 pH unit will be considered stable, and three successive readings of well purge water within 0.1 pH unit



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shall be considered as documentation that the purge water has stabilized with respect to pH.

I would appreciate a written response to this request at your earliest convenience. If you need additional information, please feel free to contact me at 848-2998.

Sincerely,



Ron D. Johnson  
Sr. Environmental Scientist

RDJ:krl  
Enclosure

cc: Ms. Jean Arya - w/o enclosure  
Mr. Gary Richardson, METRIC Corporation - w/o enclosure

*Enclosure  
Not Found*