

State of New Mexico ENVIRONMENT DEPARTMENT Harold Runnels Building 1190 St. Francis Drive, P.O. Box 26110 Santa Fe, New Mexico 87502 (505) 827-2850

MEMORANDUM

JUDITH M. ESPINOSA SECRETARY

RON CURRY DEPUTY SECRETARY

- TO: Benito Garcia, Bureau Chief
- THROUGH: Edward Horst, RCRA Program Manager

- FROM: Steve Alexander, Technical Section Supervisor S
- DATE: February 9, 1993
- SUBJECT: Remedial Action on Hazardous Waste Plume, Public Service Company of New Mexico's (PNM) Person Station, Albuquerque.

Two issues of concern have been raised concerning the January 1992 Corrective Action Directive (CAD) signed between PNM and the New Mexico Environment Department (NMED). First, will the required remedial actions provide, in a timely fashion, for protection of human health and the environment or should an alternate remediation agreement be pursued? Second, is there an "imminent threat" to human health or the environment?

As to the first question, any proposal for an alternate remediation agreement will not provide for a more timely remediation than the agreed to schedule in the CAD. PNM will conduct remediation based upon the technology chosen by NMED within the timelines given in the CAD. The estimated date for initiating the installation of the chosen remediation technology is December, 1993. Indications are that PNM would prefer to begin installation of the remediation technology as soon as possible, which could result in actual remediation beginning prior to December, 1993. Due to the above information and PNM's cooperative attitude I would not support the development of an alternate remediation proposal. PNM February 9, 1993 page 2

In response to the second question there is no indication that an imminent threat exists to human health or the environment because there are no wells currently obtaining water from or near the known or estimated extent of the plume. On December 9, 1992 NMED sampled a subset of the known domestic and municipal wells within a one mile radius of PNM and no hazardous constituents were detected. This subset of wells was compiled from records provided by the Groundwater Protection and Remediation Bureau, PNM and an NMED staff field canvas of the area. Additionally, the plume delineation indicates that over a twelve year period it has moved approximately one-half mile in an east-southeast direction. The closest production well is a City of Albuquerque municipal well approximately one and one-half miles north-northeast.