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MEMORANDUM

TO: File, PNM/Red/93

FROM: Jane Cramer, Technical Program

THROUGH: Benito Garcia, Bureau Chief, *BG*
Ed Horst, Program Manager, and *EH*
Steve Alexander, Technical Supervisor *SA*

DATE: March 22, 1993

RE: **Hazardous and Radioactive Materials Bureau and
Groundwater Protection and Remediation Bureau
meeting on modification of Public Service
Company of New Mexico Person Generating
Station (PNM) RCRA Permit.**

Attendees:

Barbara Hoditschek, Program Manager
Marc Sides, Permitting Program
Jane Cramer, Technical Program
Dennis McQuillen, Groundwater Protection and Remediation Bureau

Hazardous and Radioactive Materials Bureau (**HRMB**) staff met with Dennis McQuillen, Groundwater Protection and Remediation Bureau, on March 11, 1993 to discuss the possibility of modifying PNM's permit. The PNM RCRA unit has a Post-Closure Care Permit.

Grounds for permit modification are found in Module II, Section J. Groundwater Protection, 2. Groundwater Protection Standard (GPS), on page 14. This section states:

"In accordance with HWMR-4, Section 206.D.1.e.(2), the maximum concentrations of hazardous constituents in the groundwater shall not exceed the values provided in Table 1."

The concentrations listed in Table 1 (see attached) of the permit have been exceeded in some of the wells.

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Dennis suggested that the New Mexico Groundwater Standards ought to be the ones used rather than those in Table 1 of the permit. Barbara Hoditschek agreed that New Mexico Groundwater Standards 1991 ought to be used and further stated that those standards must be applied to all wells, not just those listed in Table 1 of the permit. The GPS needs to be adjusted because PNM exceeded the MCL specified in the permit; so, the site requires clean up to MCL concentrations. We discussed monitoring for compliance options such as, how often to sample; quarterly or annually; and whether all wells, or representative wells, should be sampled.

Marc Sides suggested the following schedule for permit modification:

end of April - complete draft modification
middle of June - public notice of modification
July - modification finished and in place.

However, the above schedule is contingent upon completing FY93 Grant Commitments first. Thus the modification will have to be scheduled and processed in FY94.

It was agreed that HRMB Permitting will proceed as lead with advice and consultation of the Groundwater Protection and Remediation Bureau, and, that PNM will be kept informed. The Technical Section agreed to reviews included in this schedule.

cc: Benito Garcia, Bureau Chief, HRMB
Ed Horst, Program Manager, HRMB
Barbara Hoditschek, Program Manager, HRMB
Steve Alexander, Technical Program Supervisor, HRMB
Steve Carey, NMED, Groundwater Protection and Remediation Bureau

Person Generating Station Permit

Table 1

Maximum Concentration Limits
(milligrams per liter)

WELL	TCA	PCE	DCE
PSMW-1	7.81	2.76	1.92
PSMW-2	10.48	3.35	1.57
PSMW-3	2.39	0.89	0.52
PSMW-3B	0.002	0.002	0.002
PSMW-4	0.002	0.002	0.002
PSMW-5	0.002	0.002	0.002
PSMW-6	0.022	0.070	0.022
PSMW-7	0.002	0.002	0.002
PSMW-8A	0.019	0.022	0.027
PSMW-8B	0.002	0.002	0.002

TCA = 1,1,1-trichloroethane
PCE = tetrachloroethylene
DCE = 1,1-dichloroethylene