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CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

August 25, 1993

Mr. Ron Johnson, Senior Environmental Scientist  
Public Service Company of New Mexico  
Alvarado Square  
Albuquerque, New Mexico 87158

**RE: Completion of Phase I of the Corrective Action  
Directive (CAD) for the RCRA Unit at Public Service  
Company of New Mexico (PNM) Person Generating Station.**

Dear Mr. Johnson,

This letter acknowledges receipt by the Hazardous & Radioactive  
Materials Bureau (HRMB) of the submittals:

- CAD Assessment Summary Report, July 1993, and;
- CAD Potential Corrective Measures Technologies Report,  
July 1993.

Following HRMB's initial review of the submittals, HRMB staff and  
PNM representatives met on August 10 to discuss HRMB's comments  
on the two submittals (CAD Phase I), and to allow Engineering-  
Science, Inc. (ESI), consultant to PNM, to present their  
recommended conceptual approach for remediation (CAD Phase II) to  
HRMB for early input. The following is a summary of the results  
of HRMB's review and of discussions during the meeting.

The CAD requires (page A-6, Item 9 of Phase I) that PNM submit a  
report discussing all Potential Corrective Measure Technologies  
considered for the site, along with, a proposal for a groundwater  
pump and treat system. The latter was not included in the  
report, however, it was included in the recommended approach for  
remediation presented by ESI in the August 10 meeting. HRMB  
understands that a written proposal for a groundwater pump and  
treat system will be included in the CAD Corrective Action  
Program submittal (page A-8, Item 1 of Phase II).

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The CAD also requires (page A-5, Item 5 of Phase I) quarterly sampling of assessment monitoring wells listed in Attachment B, Groundwater Assessment Program Overview, of the CAD. In the RCRA Monitoring Plan, Section 5.0 of the CAD Assessment Summary Report, PNM proposes the following changes to the assessment monitoring well network:

- Add wells PSMW-1R, -37, -8A, -13B, to fill data gaps.
- Drop wells PSMW-9, and 12A, because proximity to other wells renders them redundant.
- Decrease to semi-annual sampling because quarterly sampling has shown little seasonal variation, generating little useful data. And,
- drop wells PSMW-12B, and -15B because these wells are completed in the second (or lower) flow zone, and pumping of them could potentially spread contamination into this presently uncontaminated zone.

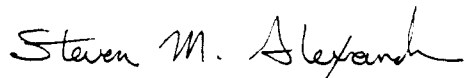
PNM also is developing a written request, pending possible future permit modification, to substitute or replace point-of-compliance wells, PSMW-5 and -6. PNM is unable to obtain groundwater samples from these wells due to the regional drop in water table elevation.

The CAD requires (second paragraph in Item 3 of Attachment B: Groundwater Assessment Program Overview) that PNM install second (or lower) flow zone wells if the Method Detection Limit is exceeded in the upper flow zone wells. In the CAD Assessment Summary Report, Appendix A: Departures from the CAD Workplan, PNM states that groundwater flow data and analytical data show that drilling of additional second flow zone wells would be unwise. As stated above, if these wells are installed and pumped, contamination could potentially be spread into presently uncontaminated zones. HRMB accepts this departure from the CAD, however, should future information indicate a need for additional second flow zone wells, HRMB may decide to require installation of these wells.

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Based on the above, HRMB certifies that the submittals; CAD Assessment Summary Report, July 1993, and, CAD Potential Corrective Measures Technologies Report, July 1993, are acceptable.

Sincerely,



Steven M. Alexander, Program Manager  
RCRA Technical Compliance Program

cc: file: PNM/red/93  
Barbara Hoditschek, Program Manager, RCRA Permitting