

Public Service Company of New Mexico

September 14, 1993

Certified Mail
Return Receipt Requested

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



Dear Ms. Hoditschek

Subject: Notice of Anticipated Noncompliance and
Request for Class I Permit Modification,
Person Station Hazardous Waste Facility,
NMT 360010342

Pursuant to permit requirements at Module I.E.13 of the Person Station Hazardous Waste Post Closure Care Permit, Public Service Company of New Mexico (PNM) is making notification of an anticipated noncompliance with permit conditions related to its groundwater monitoring program. PNM is also requesting a Class I Permit Modification to correct the noncompliance situation.

Background

Originally, the permit required semi-annual sampling of seven monitor wells (PSMW-1, 3B, 5, 6, 7, 8A, and 8B). In October 1989 sampling results exceeding the Maximum Concentration Limit at PSMW-8A triggered Compliance Monitoring of all seven wells on a quarterly basis. A Corrective Action Directive (CAD) issued in September 1991 has resulted in the installation of numerous new monitor wells and the establishment of a separate ground water monitoring program. Due to declining water table elevations at the facility, most of the original monitor wells are going dry. As a result, monitor well PSMW-1R was installed to replace PSMW-1 in January 1993. PSMW-5 and PSMW-6 will be dry within the next year and PNM will be unable to collect ground water samples as required by the permit. If the monitor wells cannot be sampled PNM will be in noncompliance of its permit.

To prevent a noncompliance situation, PNM is requesting permission to modify the permit-required ground water monitoring program as outlined below. This modification includes a request to reduce the frequency of sampling for the permit wells as well as a request to reduce the breadth of analyses. This request is being made in order to prevent permit noncompliance and to integrate and simplify requirements of the two ground water monitoring programs.

PNM is requesting the following:

1. Substitute CAD monitor well PSMW-11 for permit monitor well PSMW-5. PSMW-11 is in the vicinity of PSMW-5 and sampling results show both wells to be outside the southern edge of the contaminant plume. Both wells are located on the eastern property boundary of Person Station. Both wells were installed to monitor the upper 15 feet of the water table.
2. Replace PSMW-6 with a new monitor well to be designated PSMW-6R. PSMW-6 is strategically located on the northern property boundary of Person Station. No existing CAD well can be adequately substituted for this well. PSMW-6R would be installed to monitor the upper 15 feet of the water table (the same interval originally monitored by PSMW-6).
3. Reduce sampling requirements (frequency and types of analyses) of the permit wells so that requirements are consistent with the CAD ground water sampling program. The CAD ground water sampling program, as approved by the NMED in its letter dated August 25, 1993, institutes twice yearly sampling of most of the CAD wells and permit wells PSMW-1R and PSMW-8A for analysis by EPA method 601/8010 (chlorinated volatile organics - the only constituents known to comprise the contaminant plume). Additionally, PSMW-1R, a source area well, will be sampled once each year for analysis of all 40 CFR 264 Appendix IX constituents to determine if new contaminants are entering the groundwater from the source.

PNM is requesting that the sampling program for the permit wells PSMW-1R, PSMW-3B, PSMW-7, PSMW-8A, PSMW-8B, and (pending approval of Item 1 above) PSMW-6R, and PSMW-11, be modified to twice yearly sampling for analysis by EPA method 601/8010; and once yearly sampling of PSMW-1R and PSMW-7 for analysis of all 40 CFR 264 Appendix IX constituents. The two Appendix IX scans should be adequate to determine if new constituents are being released from the source area (PSMW-1R) or if new constituents are entering the Person Station ground water from other sources (PSMW-7).

Suggested Changes to Permit Language

To facilitate the requested modifications, the following language changes to the permit will be needed:

A. Modifications to Post Closure Care Permit

1. Module II.J.3 (Page 14)

Point of Compliance. The groundwater protection standard in permit paragraph

II.J.2. above shall apply at an imaginary vertical intercept with the first aquifer (approximately 117 feet deep) along a line drawn through wells PSMW-6, PSMW-8B, PSMW-8A, and PSMW-5 down gradient of the closed disposal unit and an imaginary horizontal intercept, parallel to the water table and intercepting the screened interval of wells PSMW-3B and PSMW-8B.

Change to:

Point of Compliance. The groundwater protection standard in permit paragraph II.J.2. above shall apply at an imaginary vertical intercept with the first aquifer (approximately 117 feet deep) along a line drawn through wells PSMW-6R, PSMW-8B, PSMW-8A, and PSMW-11 down gradient of the closed disposal unit and an imaginary horizontal intercept, parallel to the water table and intercepting the screened interval of wells PSMW-3B and PSMW-8B.

2. Module II.J.4.C (Page 14)

HWMR-4, Section 206.D.1.j.(6) is changed to require that monitoring wells PSMW-3B, PSMW-6, PSMW-8A, PSMW-8B, and PSMW-5 shall be sampled and analyzed only for volatile and semi-volatile organic constituents within ninety days of the determination of the significant increase.

Change to:

HWMR-4, Section 206.D.1.j.(6) is changed to require that monitoring wells PSMW-3B, PSMW-6R, PSMW-8A, PSMW-8B, and PSMW-11 shall be sampled and analyzed only for volatile and semi-volatile organic constituents within ninety days of the determination of the significant increase.

3. Module III.F.1 (Page 16)

Designated Wells. The designated monitoring wells are PSMW-1 in the vicinity of the permitted unit and down gradient wells PSMW-3B, PSMW-6, PSMW-8A and PSMW-8B.

Change to:

Designated Wells. The designated monitoring wells are PSMW-1R in the vicinity of the permitted unit and down gradient wells PSMW-3B, PSMW-6R, PSMW-8A, PSMW-8B and PSMW-11.

4. Module III.F.3.C (Page 17)

Monitor wells PSMW-3B, PSMW-6, PSMW-8A and PSMW-8B shall annually

be sampled as above and quantitatively analyzed for volatile and semi-volatile organic compounds using EPA approved methods. Detection of organic constituents other than TCA, PCE or DCE shall be reported to the Director within seven days of receipt of the analytical results by the Permittee.

Change to:

Monitor wells PSMW-1R and PSMW-7 shall annually be sampled as above and quantitatively analyzed for 40 CFR 264, Appendix IX constituents. Detection of new constituents, not previously reported, shall be reported to the Director within seven days of receipt of the analytical results by the Permittee.

5. Table 1, Maximum Concentration Limits (Page 20)

Add to Table:

<u>Well</u>	<u>TCA</u>	<u>PCE</u>	<u>DCE</u>
PSMW-1R	7.81	2.76	1.92
PSMW-6R	0.022	0.070	0.022
PSMW-11	0.002	0.002	0.002

Maximum concentration limits (MCLs) for PSMW-1R and PSMW-6R correspond to existing MCLs for PSMW-1 and PSMW-6, respectively. MCLs for PSMW-11 correspond to existing MCLs for PSMW-5.

6. Figure 2, Post Closure Inspection Log Sheet

A revised form is enclosed. The revised form is more generic in format and will allow incorporation of all monitor wells at Person Station.

7. Modifications to Attachment A, Post Closure Care Plan

1. Page 14, Paragraph 8.

The wells to be used for water chemistry sampling are PSMW-1 and PSMW-3B in the immediate area of the waste tank and PSMW-8A, PSMW-8B and PSMW-6 down gradient from the tank, as shown in Figure 1. Water levels will be measured annually in all ten monitoring wells which have been installed at Person Generating Station (Figure 1). Each well to be sampled will be checked first for water level, then purged of three to five casing-volumes, or emptied if purging is not possible. After purging, samples will be collected using dedicated stainless steel bailers. Sufficient sample will be obtained to conduct the required analyses.

Handwritten note: A revised sheet to make sure that these wells are sampled.

Change to:

The wells to be used for water chemistry sampling are PSMW-1R and PSMW-3B in the immediate area of the waste tank and PSMW-8A, PSMW-8B, PSMW-6R and PSMW-11 down gradient from the tank. Water levels will be measured annually in all functional monitoring wells installed at Person Generating Station. Each well to be sampled will be checked first for water level, then purged of three to five casing-volumes, or emptied if purging is not possible. After purging, samples will be collected using dedicated teflon-lined bladder pumps or dedicated stainless steel bailers. Sufficient sample will be obtained to conduct the required analyses.

2. Page 15, Paragraph 6.

Monitor wells PSMW-3B, PSMW-5, PSMW-6, PSMW-8A and PSMW-8B shall annually be sampled as above and quantitatively analyzed for volatile and semi-volatile organic compounds using EPA-approved methods. Detection of organic constituents other than TCA, PCE or DCE shall be reported to the Director within seven days of receipt of the analytical results by the Permittee.

Change to:

Handwritten note:
Add PSMW-1R and PSMW-7
to the list of wells to be
sampled and analyzed for
40 CFR 264, Appendix IX
constituents.

Monitor wells PSMW-1R and PSMW-7 shall annually be sampled as above and quantitatively analyzed for 40 CFR 264, Appendix IX constituents. Detection of new constituents, not previously reported, shall be reported to the Director within seven days of receipt of the analytical results by the Permittee.

Enclosed are tables detailing existing requirements of the Compliance Monitoring Program and the CAD Monitoring Program, and requirements for the proposed Permit Ground Water Monitoring Program, a map showing monitor well locations, and a revised Water Level Measurement and Well Inspection Log. If you need additional information, please contact me at 848-2998.

Sincerely,

Ron D. Johnson
Sr. Environmental Scientist

RDJ:rdj
enclosures

Existing Compliance Monitoring Program
Person Station, NMT 360010342

Well ID	Sampling Frequency	Analysis Required
PSMW-1R	Quarterly	8010 quarterly, Appendix IX scan 1/yr
PSMW-3B	Quarterly	8010 quarterly, Appendix IX scan 1/yr
PSMW-5	Quarterly	8010 quarterly, Appendix IX scan 1/yr
PSMW-6	Quarterly	8010 quarterly, Appendix IX scan 1/yr
PSMW-7	Quarterly	8010 quarterly, Appendix IX scan 1/yr
PSMW-8A	Quarterly	8010, Pb & Cr quarterly; Appendix IX scan 1/yr
PSMW-8B	Quarterly	8010 quarterly, Appendix IX scan 1/yr

Water levels are measured in all operational wells twice per year.

Existing CAD Monitoring Program
Person Station, NMT 360010342

Well ID	Sampling Frequency	Analysis Required
PSMW-1R	Semi-annual	8010 2/yr; Appendix IX scan 1/yr
PSMW-1B	Semi-annual	8010
PSMW-3B	Semi-annual	8010
PSMW-7	Semi-annual	8010
PSMW-8A	Semi-annual	8010
PSMW-8B	Semi-annual	8010
PSMW-10	Semi-annual	8010
PSMW-11	Semi-annual	8010
PSMW-13A	Semi-annual	8010
PSMW-13B	Semi-annual	8010
PSMW-14	Semi-annual	8010
PSMW-16	Semi-annual	8010
PSMW-17	Semi-annual	8010
PSMW-18	Semi-annual	8010
PSMW-19	Semi-annual	8010
PSMW-20	Semi-annual	8010
PSMW-21	Semi-annual	8010
PSMW-22	Semi-annual	8010
PSMW-23	Semi-annual	8010
PSMW-24	Semi-annual	8010
PSMW-25	Semi-annual	8010
PSMW-26	Semi-annual	8010
PSMW-27	Semi-annual	8010
PSMW-28	Semi-annual	8010
PSMW-29	Semi-annual	8010
PSMW-30	Semi-annual	8010
PSMW-31	Semi-annual	8010
PSMW-32	Semi-annual	8010
PSMW-33	Semi-annual	8010
PSMW-34	Semi-annual	8010
PSMW-35	Semi-annual	8010
PSMW-36	Semi-annual	8010
PSMW-37	Semi-annual	8010

Water levels are measured in all operational wells twice per year

Proposed Permit Monitoring Program
Person Station, NMT 360010342

Well ID	Sampling Frequency	Analysis Required
PSMW-1R	Semi-annual	8010 2/yr; Appendix IX scan 1/yr
PSMW-3B	Semi-annual	8010
PSMW-6R	Semi-annual	8010
PSMW-7	Semi-annual	8010 2/yr; Appendix IX scan 1/yr
PSMW-8A	Semi-annual	8010, Pb & Cr
PSMW-8B	Semi-annual	8010
PSMW-11	Semi-annual	8010

Water levels would be measured in all operational wells twice per year.

PERSON STATION HAZARDOUS WASTE FACILITY
 (NMT360010342)
 WATER LEVEL MEASUREMENT AND WELL INSPECTION LOG

DATE	OPERATOR(S)	SOUNDER	
WELL NUMBER	FIELD MEASUREMENT	TIME	NOTES

- FOR EACH WELL CHECK THE FOLLOWING:**
1. Is there evidence of surface leakage into well?
 2. Is the well cover broken or rusted through?
 3. Is the integrity of the cover lock good?
 4. Are there indications of well plugging or blockage?
 5. Are well guard posts intact (if applicable)?
 6. Is there evidence of vandalism to well structures?

Form Date 08/05/93