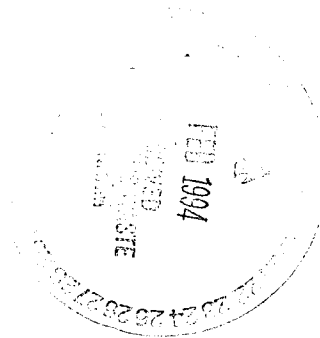


Public Service Company of New Mexico



February 15, 1994

Certified Mail
Return Receipt Requested

Mr. Marcus Sides
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
525 Camino de Los Marquez
Santa Fe, NM 87502

Dear Mr. Sides

Subject: Person Generating Station, RCRA
Permit Modification, NMT360010342,
Additional Information

Enclosed please find additional information needed for our requested permit modification per our telephone discussions. I am enclosing the following items:

1. Revised Post-Closure Care Plan. The post-closure care plan has been substantially revised to incorporate activities associated with our proposed Corrective Action Program. I have also included a 3.5 inch DOS formatted diskette containing a copy of the post-closure care plan in a Word Perfect file named "PCPLAN.PNM".
2. Revised inspection log for the security fence around the Person Station property.
3. Revised inspection log for the closure cap.
4. A sketch map of the Person Station property showing the approximate locations of the closure cap and all monitor wells on the property. This map also shows the proposed location for replacement monitor well PSMW-6R.

If you need additional information, please let me know. I can be reached at 848-2998.

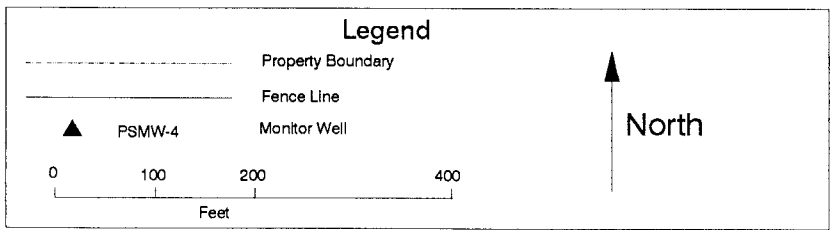
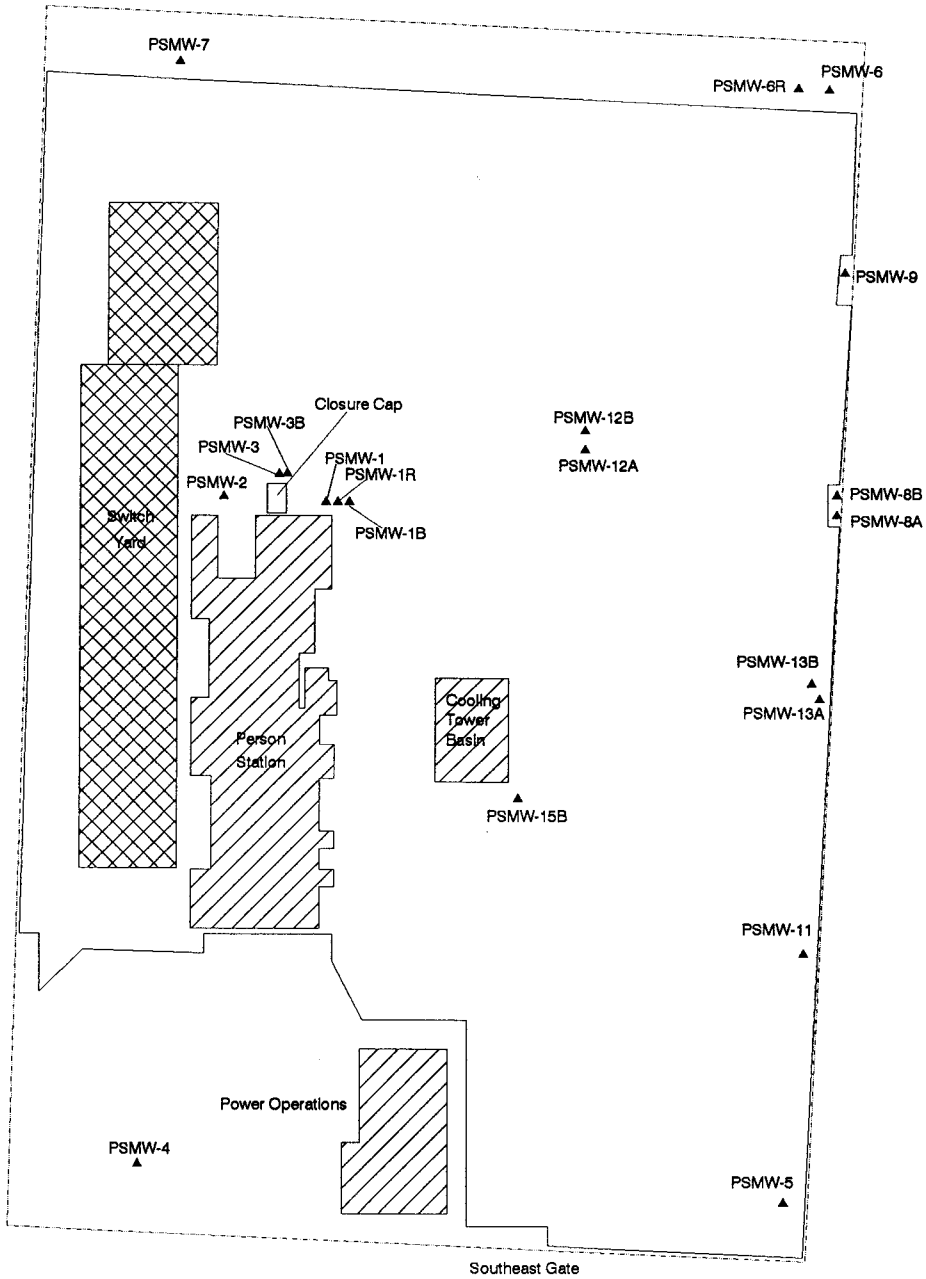
Sincerely,

A handwritten signature in cursive script that reads "Ron Johnson".

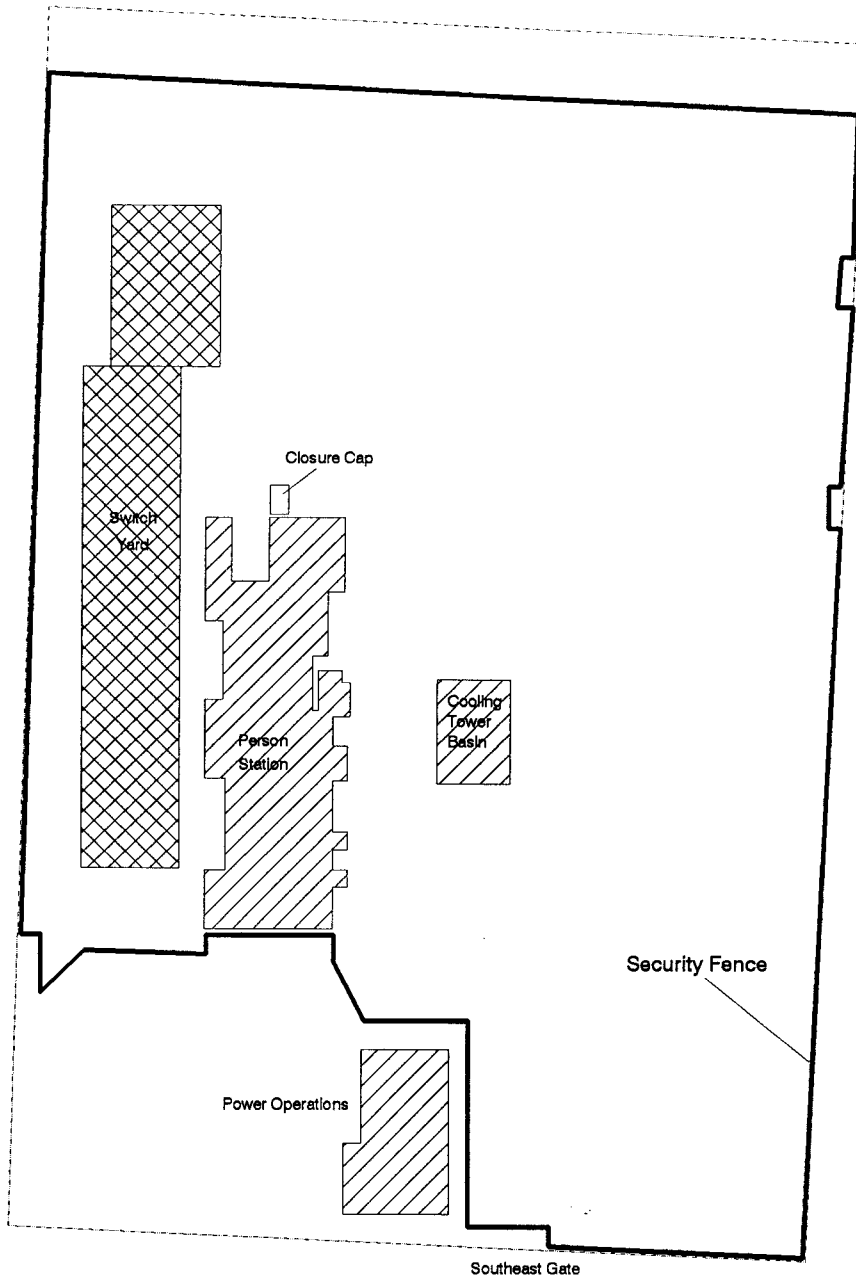
Ron D. Johnson
Sr. Environmental Scientist

RDJ:rdj
enclosures

Person Station Hazardous Waste Facility
 (NMT 360010342)
 Monitor Wells on Property



Person Station Hazardous Waste Facility
(NMT 360010342)
Security Fence Inspection Log

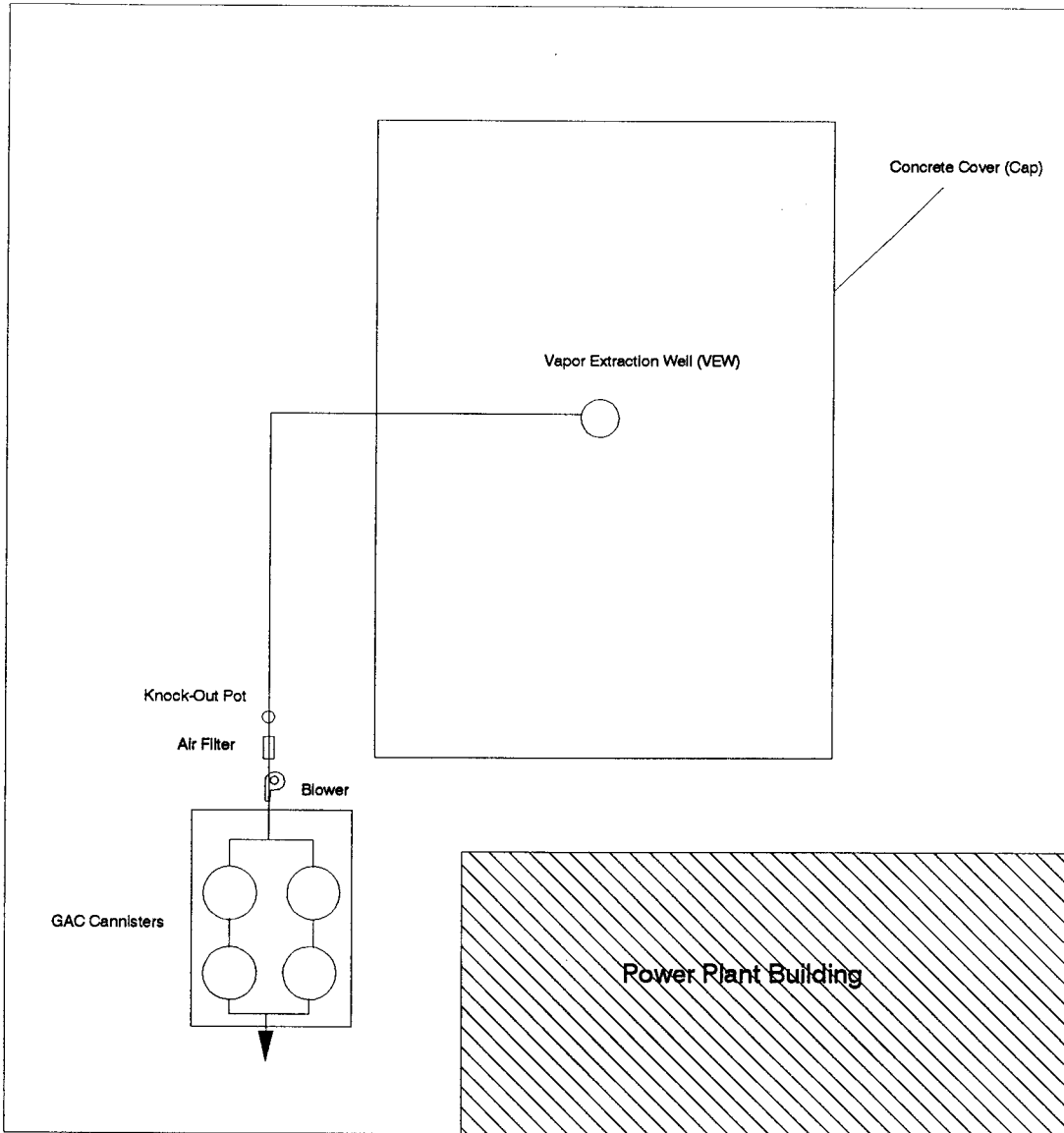


Security	Problem (Y/N)	Action Taken	Date
Fence			
Gates			
Locks			
Outrigging			
INSPECTOR: _____ DATE: / / TIME: :			

This log documents that the security fence was inspected for evidence of deterioration and found to be in good working order, except for problems noted above (if any).

Signature of Inspector

Person Station Hazardous Waste Facility
 (NMT 360010342)
 Closure Cap and VEW Inspection Log



Description	Problem (Y/N)	Action Taken	Date
Surface Wear/Gouging			
Cracks/Deterioration			
Subsidence			
Water Ponding			
VEW-Cap Seal			
VEW-Vacuum Lines			
Comments:			
INSPECTOR: _____ DATE: / / _____ TIME: : _____			

This log documents that the Person Station Closure Cover and VEW were inspected for evidence of deterioration, subsidence, vacuum line leaks, and seal integrity. All surface blemishes/problem areas are noted on the sketch above.

 Signature of Inspector

PUBLIC SERVICE COMPANY OF NEW MEXICO
PERSON GENERATING STATION

POST-CLOSURE CARE PERMIT
NMT 360010342-1
ATTACHMENT A

POST-CLOSURE CARE PLAN
Revised February 1994

Post-Closure Plan for A Hazardous Waste Disposal Facility
at Person Generating Station

Introduction

This document discusses post-closure activities to be conducted after closure of the hazardous waste disposal facility at PNM's Person Generating Station as required by 40 CFR 264.118.

This post closure care plan is being revised to incorporate changes in activities related to the initiation of a Corrective Action Program (CAP). The CAP was approved by the NMED subsequent to the submittal of a Corrective Measures Proposal (CMP) by PNM in November 1993. As part of the CAP, PNM proposed to install a vapor extraction dewatering well (VEW) through the center of the closure cap.

Details of the CAP are contained in the document Corrective Measures Proposal for the Person Generating Station, PNM, January 1994, prepared by Engineering Science, Inc. The VEW should effectively remove most of the remaining contaminants beneath the closure cap.

1.0 Background

The Person Generating Station site was a gas and oil fired electrical production facility operated by PNM from 1951 through 1986. The site still contains an operational electrical switching station and power operations facility. The power plant cannot be operated in its current condition.

The Person Generating Station site included a maintenance area to support, among other activities, equipment cleaning efforts. The parts wash area included a sump and a below-grade waste oil tank. The tank was apparently in use from about July 1976 until October 13, 1983 when it was discovered that the tank lacked an impermeable bottom (i.e., the tank bottom was constructed of soil).

Following removal of the tank from service, PNM installed a closure cap on the 25 foot by 35 foot source area to minimize infiltration. The cap was comprised of a minimum 6 inch thick concrete cap over a minimum 6 inch thick layer of compacted soil over two layers of 80 mill High Density Polyethylene (HDPE) plastic sheeting.

The closure cap was installed pursuant to a RCRA Closure Plan approved by the NMED in September 1987. Post Closure care of the cap has occurred pursuant to a RCRA permit and post closure care plan approved by the NMED which became effective in August 1988.

This document is the post closure care plan for the cap as required by 40 CFR 264.118 (or New Mexico equivalent).

2.0 Post Closure Care Period Contact

In the event it should become necessary to contact PNM concerning this disposal facility during the post-closure care period, please write or call:

Director
Environmental Services Department
Public Service Company of New Mexico
Alvarado Square
Albuquerque, NM 87158-0408
(505) 848-2700

3.0 Monitoring Activities

The following subsections describe the planned monitoring and inspection activities and the frequency at which they will be performed during post closure care.

All inspections will be recorded on an appropriately signed inspection log sheet identified in the post closure care permit. These log sheets will include the date and time of inspections, name of the inspector, notations of observations made and the date and nature of any repairs or remedial action. These log sheets will be placed in an inspection log maintained at PNM's Document Control Center at its Alvarado Square, Albuquerque, New Mexico offices.

3.1 Groundwater Monitoring

Permit compliance monitor wells (identified in the post closure care permit) will be sampled twice each year and analyzed using the EPA approved method 601/8010 (chlorinated volatile organic). This method will identify the constituents known to have been released from source area. Additionally, once each year a source well and a background well (identified in the post closure care permit) will be additionally analyzed for all constituents contained in 40 CFR 264 Appendix IX. This screening will identify any new groundwater contaminants either entering the groundwater from the source area or entering the groundwater beneath the site from an off-site (upgradient) source.

During sampling events, each monitor well will be inspected. This inspection will include the locking system of the security cap, the security cap function, possible damage to the protective casing at the surface, and its grouting, and any barrier protective posts. If tampering of a groundwater monitoring well is discovered during groundwater sampling, or at any other time, NMED will be notified.

Should a well become inoperable during the post-closure care period, NMED will be notified. Appropriate action, including the possible installation of a replacement well, will be taken by PNM.

3.2 Cap Inspections

An integral part of the post-closure plan is an inspection program to determine the condition of the cover placed during closure activity. These inspections will be carried out twice yearly concurrent with groundwater monitoring activity. These inspections will be of a visual nature to determine if deterioration of the closure cover surface or subsidence has occurred. If at any time it is determined that any surface wear or cracking of the surface cover has occurred which endangers the integrity of the HDPE liner, repairs will be made as needed.

After the installation of the VEW, cap inspections will also include visual inspection of the seals around the VEW where it penetrates the concrete cover as well as inspections of piping joints and connections where the vacuum lines feed to the granular activated carbon canisters.

3.3 Security Fence Inspections

Inspection of the security fence and its gates will also occur to ensure that they are in good repair and have not been breached in any manner. Any damage noted in this fencing will be repaired as soon as practicable. These inspections will be carried out twice yearly concurrent with groundwater monitoring activity.

3.4 Corrective Action Program Activities

In order to evaluate the effectiveness of the VEW, soil gas from the VEW will be monitored for total volatile organic using a hand held photo-ionization detector instrument on the following schedule: daily for the first week, weekly thereafter. This same schedule and sampling technique will be used to monitor the effluent gas from the granular activated carbon unit.

4.0 Maintenance Activities

The following subsections describe the planned maintenance activities and the frequency at which they will be performed during post closure care.

All maintenance activities will be recorded in field logs or field notebooks. The field logs and field notebooks will include the date of activities, name(s) of the persons conducting maintenance, and type of maintenance performed. These records will be maintained at PNM's Document Control Center at its Alvarado Square, Albuquerque, New Mexico offices.

4.1 Maintenance of Groundwater Monitoring Wells

The groundwater monitoring wells have been designed to require little maintenance. If a routine inspection, as described above, determines the need for maintenance activity this will be performed as soon as possible. The types of maintenance that might be anticipated include replacement of a barrier post, replacement of the concrete skirting (pad), replacement of locks, removal of sediment accumulating in the bottom of the well, re-development of the well, and repair or replacement of dedicated sampling pumps.

4.2 Maintenance of the Cap

The concrete cap has been designed to require little maintenance. If a routine inspection, as described above, determines the need for maintenance activity this will be performed as soon as possible. The types of maintenance that might be anticipated include grouting of major cracks or joints and removal of vegetation growing in cracks or joints.

4.3 Security Fence Maintenance

PNM has enclosed Person Generating Station with an eight-foot high chain link security fence with barbwire outrigging to halt the unauthorized entry of persons and livestock onto the facility's ground. Gates are normally locked except during periods of high usage. During normal weekday hours, to permit employee and supplier entry to the facility, one service gate located near the southeast corner of the southern fenceline may remain open.

An additional gate located at the southwest corner of the southern fence line remains open. However, this entrance only allows access to the parking lot on the south side of Person Generating Station. Further access to Person Generating Station or PNM's Power Operations facility from this area is denied via locked gates.

If a routine inspection, as described above, determines the need for maintenance activity this will be performed as soon as possible. The types of maintenance that might be anticipated include repair of a cut in the fence, repair of major holes beneath fence caused by erosion, repairs of gates or locking mechanisms caused by usage.

4.4 Corrective Action Program Maintenance

The soil vapor extraction system is specified for long-term operation and will be mechanically simple and engineered for reliable, low-maintenance operation. It is anticipated that the soil vapor extraction system will operate only 18-24 months. Routine maintenance includes a monthly change of the unit's air filter and removing any condensate that may have accumulated in the knock-out pot. During the initial months of operation, maintenance may also include replacement of carbon canisters and shipment of spent canisters to the manufacturer for regeneration.

5.0 Personnel Training

PNM has established a program of on-the-job training that teaches personnel providing facility inspections and groundwater monitoring to perform their duties in a manner that ensures the facility will be in compliance with training requirements. All persons performing these duties will be members of PNM's Environmental Services Department. This program will be directed by a person trained in hazardous waste management procedures who is on the staff of PNM's Environmental Services Department.

Personnel training is an integral part of PNM's post-closure plan for this facility. This program ensures that the personnel involved in the post-closure activities are properly trained to inspect the security measures, condition of the closure cover and groundwater monitoring wells.

PNM will maintain documentation and records that contains the job title of each position at the facility related to post-closure activities; the name of each employee filling each position; a written job description for each position listed which includes the requisite skill, education or other qualifications, and duties of employees assigned to each position; and a written description of the type and amount of training to be given to each person filling a listed position. Records that document training will also be maintained by PNM.

Staff responsible for performing groundwater monitoring, including well sampling, sample handling and data assessment, will be professional hydrologists. As needed over the period of the monitoring program, the professional hydrologists may train other staff to assist on field sampling efforts of groundwater monitoring. However, a fully qualified hydrologist will always supervise sampling efforts, will review results of sampling, and will assess the significance of monitoring data.

Procedures for performing the groundwater monitoring program will follow methods given in various U.S. EPA documents, including:

1. Handbook for Ground Water, 1987, U.S. Environmental Protection Agency Document, EPA-625/6-87-016.
2. RCRA Ground-Water Monitoring Technical Enforcement Guidance Document, 1986, U.S. Environmental Protection Agency Document, OSWER-9950.1.
3. Test Methods for Evaluating Solid Waste-Physical/Chemical Methods, 1986. U.S. Environmental Protection Agency Report SW-846, 3rd edition.

6.0 Amendment of Plan

Should it be necessary to modify substantive aspects of this Post-closure Plan, the Plan will be amended in writing within 60 days after the changes occur. Such amendments will be submitted to the NMED for approval as soon as practicable after it becomes apparent that a modification is needed.