Public Service Company of New Mexico

Ron

Teri 0.

Phr year, see Phr. Jack

your July 13, 1994

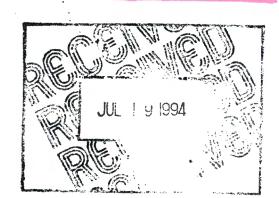
Certified Mail Return Receipt Requested

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

Dear Mr. Garcia:

Subject:

Request for Modification to Technical Schedule for Person Station Corrective Action Directive (NMT 360010342)



On September 18, 1991, the New Mexico Environment Department (NMED) issued a Corrective Action Directive (CAD) for ground water contamination at the Person Generating Station RCRA facility. A technical schedule for completion of activities associated with a ground water contamination investigation (Phase I) and a Corrective Action Program (Phase II) were developed by the NMED and PNM pursuant to the CAD. This schedule is shown in Attachment 1 to this letter. Implementation of the technical schedule began in January 1992.

Both PNM and HRMB have worked diligently in trying to maintain compliance with the original technical schedule. However, neither party anticipated certain requirements which lead to delays in implementation of the schedule. Even though HRMB approved the Corrective Measures Proposal (CMP) on January 24, 1993, (See Item 4a of Attachment 1), PNM could not immediately begin installation of the CAP equipment (as proposed in the technical schedule) because several items/issues needed resolution before installation could begin. For example:

- PNM's contractor, Engineering Science, needed time to prepare engineering specifications and drawings for bid and construction purposes.
- Implementation of the CMP required the issuance of an air permit from the Bernalillo County Air Quality Control Division. Their regulations prohibit any construction until the permit is issued.
- Implementation of the CMP required a RCRA permit modification from the NMED in order to disturb the integrity of the closure cover.

• Implementation of the CMP required a workable solution for disposal of the treated ground water. Regulatory permitting and private agreements needed to be completed.

These items, and others, caused considerable departures from the original technical schedule. PNM is hereby requesting that the NMED HRMB modify the CAD technical schedule to reflect new deadlines. PNM's recommended modified schedule is also enclosed as Attachment 2.

If you have any questions, please contact me at 848-2998.

Sincerely,

Ron D. Johnson

Sr. Environmental Scientist

RDJ:rdj enclosures

cc: Teri Davis - NMED HRMB

## Attachment 1 Person Generating Station (NMT360010342) Corrective Action Directive - Phase II Schedule

Item	Scheduled Days to Completion	Scheduled Date	Actual Days Needed to Complete Item	Completion Date	Description
0	0	NA	0	Aug 25, 1993	HRMB certifies that Phase I of the CAD is complete (i.e., Assessment Summary Report for Phase I is approved).
1	60	Oct 24, 1993	86	Nov 19, 1993	PNM will submit a proposal for Phase II of its Corrective Action Program (i.e., prepare and submit a Corrective Measures Proposal or CMP).
					Note: PNM requested, and HRMB granted an extension of the due date to November 19, 1993.
2	90	Nov 23, 1993	118	Dec 21, 1993	PNM receives HRMB's comments on the CMP.
					Note: HRMB, at this time, requested that PNM conduct a detailed Baseline Risk Assessment.
3	120	Dec 23, 1993	146	Jan 18, 1994	PNM incorporates HRMB's comments and resubmits the CMP.
					Note: PNM commits to conducting a Baseline Risk Assessment and agrees to meet with HRMB to establish framework for the Risk Assessment.
4a 4b	125 125	Dec 28, 1993 Dec 28, 1993	152 ?	Jan 24, 1994 ?	HRMB approves CMP. PNM begins installation of CAP equipment.
5	215	Mar 28, 1994	?	?	Installation of CAP equipment complete.
6	275	May 27, 1994	?	?	A post-corrective measures implementation report is submitted to HRMB.

## Attachment 2 Person Generating Station (NMT360010342) Corrective Action Directive - Revised Phase II Schedule

Item	Scheduled Days to Completion	Scheduled Date	Description
4a	0	December 28, 1993	HRMB approves Corrective Measures Proposal for Phase II.
4b	199	July 15, 1994	PNM obtains all necessary regulatory approvals, private agreements, etc. needed to implement CMP. PNM finalizes all engineering specifications, construction diagrams, bid packages, etc., and selects construction contractors.
4c	212	July 25, 1994	<ul> <li>PNM begins installation of CAP-Phase I equipment. Installation includes:</li> <li>Trenching and installation of all underground piping.</li> <li>Construction of building enclosure for air stripper system, installation of air strippers.</li> <li>Drilling and installation of vapor extraction/dewatering well through closure cap.</li> <li>Installation of vapor extraction treatment system.</li> <li>Conversion of monitor well PSMW-16 into pump and treat well.</li> </ul>
5	279	October 3, 1994	Installation of CAP-Phase I equipment complete. System startup and check-out complete.
6	369	January 1, 1995	CAP Phase I complete. CAP Phase I effectiveness evaluated and information used in the final design for CAP-Phase II.
7	400	February 1, 1995	PNM begins additional installation for CAP Phase II.
8	428	March 1, 1995	PNM completes additional installation for CAP Phase II. CAP Phase II begins.
9	489	May 1, 1995	A post-corrective measures report is submitted to HRMB.