

Public Service Company of New Mexico

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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.

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- 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 | 125 | Dec 28, 1993 | 152 | Jan 24, 1994 | HRMB approves CMP. |
| 4b | 125 | Dec 28, 1993 | ? | ? | 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 | PNM begins installation of CAP-Phase I equipment. Installation includes: <ul style="list-style-type: none"> ● Trenching and installation of all underground piping. ● Construction of building enclosure for air stripper system, installation of air strippers. ● Drilling and installation of vapor extraction/dewatering well through closure cap. ● Installation of vapor extraction treatment system. ● Conversion of monitor well PSMW-16 into pump and treat well. |
| 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. |