

Public Service Company of New Mexico

November 30, 1994

Certified Mail
Return Receipt Requested

Mr. Richard Ohrbom
New Mexico Environment Department
Groundwater Bureau
1190 St. Francis Drive
P.O. Box 26110
Santa Fe, NM 87502

Dear Mr. Ohrbom

Subject: Additional Information Needed to Complete
Request for Discharge Plan, Groundwater
Treatment Program, Person Generating Station

In June 1994, METRIC Corporation acting on behalf of Public Service Company of New Mexico (PNM) submitted a discharge plan application for Person Generating Station (For irrigation of UNM Championship Golf Course).

In October 1994, in a telephone conversation, you indicated that the NMED could not issue an approved discharge plan until it had received the following additional items: 1) a letter indicating that the NMED-HRMB had reviewed and approved a pending risk assessment for the groundwater treatment scenario, and 2) a copy of the contractual agreement between PNM and UNM for acceptance of the treated water at the UNM Championship Golf Course.

Risk Assessment

Parsons-Engineering Science, Inc., has prepared a risk assessment (RA) to develop quantitative risk information associated with the contaminated soil and groundwater at or originating from the Person Generating Station. The RA included an evaluation of risk associated with the selected water disposal option, i.e., discharge of the treated water to a reservoir on the Championship Golf Course. The RA was submitted to the NMED Hazardous and Radioactive Materials Bureau for their review on September 19, 1994. The HRMB notified PNM by letter dated November 7, 1994, that they had completed their review and that they concurred with its findings.

Essentially, the RA showed that there is no appreciable risk to on site and off site workers due to exposure to current and projected future levels of contamination at the site. Additionally, the RA showed that the planned remedial action should result in a level of cleanup that will be protective under even the most conservative exposure scenario (i.e., future on site residents). The RA also evaluated whether or not there was a risk to human health during the proposed remediation. The

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under even the most conservative exposure scenario (i.e., future on site residents). The RA also evaluated whether or not there was a risk to human health during the proposed remediation. The RA found that treating extracted groundwater to achieve an effluent discharge of below 5 ppm (for each contaminant) prior to discharge to surface water would be sufficient to protect human health. The proposed remediation system includes treatment to this effluent level.

Enclosed with this letter are the following items associated with the RA: 1) The RA titled Focused Risk Assessment For The Person Generating Station, Public Service Company of New Mexico, and 2) a copy of the NMED-HRMB letter dated November 7, 1994.

Water Acceptance Agreement

After determining that transfer of the treated groundwater to the UNM golf course was a viable option, PNM and UNM representatives held a series of meetings to discuss the feasibility of a contractual agreement between the parties. The agreement was completed in November 1994. A copy of the agreement is also enclosed.

This submittal should satisfy all remaining requirements for the issuance of a discharge plan for the groundwater treatment project. If there are any additional items needed, or you have any questions regarding the information supplied today, please feel free to contact me at (505) 848-2998.

Sincerely,



Ron D. Johnson
Sr. Environmental Scientist

RDJ:rdj
enclosures

cc: Teri Davis - NMED HRMB
Kim Murphy, UNM Director of Real Estate w/o agreement