



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us



JOHN R. D'ANTONIO, Jr.
SECRETARY

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

September 24, 2002

John Hale, PE
Technical Project Manager
Public Service Company of New Mexico
2401 Aztec NE (MS Z160)
Albuquerque, NM 87107

**RE: GROUNDWATER TREATMENT SYSTEM IMPROVEMENT
CLASS 1 PERMIT MODIFICATION REQUEST
PERSON GENERATING STATION NMT360010342
HWB-PNM-01-099**

Dear Mr. Hale:

The New Mexico Environment Department (NMED) has completed its review of Public Service Company of New Mexico's (PNM) letter dated July 19, 2002, requesting a Class 1 Permit Modification to the Person Generating Station RCRA Post-Closure Care Permit, Permit No. NMT360010342-1.

NMED has determined that this request constitutes a Class 1 permit modification not requiring prior agency approval in accordance with 20.4.1.900 NMAC (incorporating 40 CFR 270.42 Appendix I.A.3) and hereby approves this Class 1 permit modification to modify the Groundwater Treatment System (GTS) by replacing the existing air/stripper/acid addition/granular activated carbon (GAC) unit with two in-series GAC units. The pilot-scale GTS was placed into limited service in September 2001.

This Class 1 permit modification is considered a minor change that does not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment pursuant to 20.4.1.900 NMAC (incorporating 40 CFR 270.42 (a) (1)).

Mr. John Hale, PE
September 24, 2002
Page 2

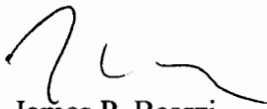
The approved permit modification consists of the following, as proposed by PNM:

- 1) Removal of the existing groundwater treatment system comprised of an air/stripper/acid addition/granular activated carbon (GAC) unit and replace with two in-series GAC units.
- 2) The in-series GAC treatment system has successfully removed volatile organic carbons (VOCs) to below laboratory detection limits. Analytical results for the May and June 2002 sampling events were submitted to NMED for review. A description of the sample locations, a description of the proposed full-scale system, and engineering drawings were submitted to NMED in support of this Class 1 permit modification request.
- 3) The new GAC groundwater treatment system is hereby incorporated and made part of the Post-Closure Care Permit and Permit Attachments. PNM shall insert the description of the sample locations, the description of the proposed full-scale system, and engineering drawings into applicable portions of their Permit and Permit Attachments.

PNM is also required to send a notice of the permit modification to all persons on the enclosed facility mailing list. This notification must be made within 90 calendar days after the change is put into effect in accordance with 20.4.1.900 NMAC (incorporating 40 CFR 270.42 (a) (1) (ii)).

If you have any questions please contact Robert Warder of my staff by phone at (505) 841-9040.

Sincerely,



James P. Bearzi
Chief
Hazardous Waste Bureau

JPB:rw

Enclosure

cc w/o enclosure:

John Kieling, NMED HWB
Will Moats, NMED HWB
Robert Warder, PE, NMED HWB
Laurie King, EPA Region 6 (6PD-N)

File: Red PNM-01-000 and Reading File