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PNM 06

May 25, 2006

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**



*A personal commitment  
to New Mexico*

Mr. John Kieling  
RCRA Permits Program Manager  
New Mexico Environment Department  
Hazardous Waste Bureau  
2905 Rodeo Park Drive East, Building I  
Santa Fe, NM 87505

**RE: Person Generating Station (NMT 360010342-1) - Class I Permit Modification Request for Laboratory Analytical Method Change**

Dear Mr. Kieling:

Public Service Company of New Mexico (PNM) is requesting modification of its existing Resource Conservation and Recovery Act Post-Closure Care Permit (NMT360010342) for the Person Generating Station. Pursuant to 20.4.1.900 NMAC incorporating 270.42, Appendix I.C.2, this request is being submitted as a Class I permit modification request, subject to prior approval by the New Mexico Environment Department Secretary.

The exact modification to be made to the permit conditions and supporting documents is to change the laboratory analytical method referenced in Section IV.A.2.a.iv.f of the Post-Closure Care Permit from U.S. EPA Method 8021B to U.S. EPA Method 8260B.

The purpose of this change is to use a more current laboratory analytical method for the analyses of certain volatile organic compounds in water samples collected from the monitoring wells and extraction wells as required by the Post-Closure Care Permit. EPA Method 8021B utilizes gas chromatography with electrolytic conductivity detectors in series with a photoionization detector. EPA Method 8260 utilizes gas chromatography with mass spectrometry. EPA Method 8260 can achieve the same laboratory detection limits or better than EPA Method 8021B. In addition, EPA Method 8260B also has the capability to confirm the identity of a parameter by comparison to a current parameter database.

Laboratory detection limits for the monitored parameters will remain the same or lower with the change to EPA Method 8260B. This change will have no affect on any other permit conditions.

If you have any questions, please contact John Hale of my staff at (505) 241-2014.

Sincerely,

Matt Lavery  
Director, Participant Services

Cc: David Mayerson  
New Mexico Environment Department  
Hazardous Waste Bureau  
5500 San Antonio NE  
Albuquerque, NM 87109