

Public Service Company of New Mexico

October 8, 1993

Certified Mail
Return Receipt Requested

Ms. Barbara Hoditschek
New Mexico Environment Department
Hazardous and Radioactive Materials Bureau
525 Camino de Los Marquez
Santa Fe, NM 87502

Dear Ms. Hoditschek

Subject: Request For Modification of
Post Closure Plan, Person Generating
Station, NMT360010342

Public Service Company of New Mexico (PNM) is hereby requesting a modification of our post closure care plan for the RCRA facility at Person Station (NMT360010342). This modification request concerns a proposal by PNM to temporarily disturb the closure cap and liners for the purpose of installing a soil vapor extraction system designed to remediate remaining buried contaminants.

PNM is currently responding to a Corrective Action Directive (CAD) issued by the New Mexico Environment Department (NMED) in September 1991. PNM has completed Phase I of the CAD (assessment of the shallow contaminant plume) and is currently preparing a corrective measures proposal (CMP) for Phase II (remediation). The CMP intends to include remediation of the vadose zone contaminants beneath the permitted unit using soil vapor extraction (SVE) technology. The preferred design requires the installation of a dual purpose SVE/ground water extraction well through the concrete cap, plastic liners, and contaminated soil. The SVE well will facilitate remediation of the contaminated soil and will also be used to pump underlying contaminated ground water to the surface for treatment.

Module II.M. of our post closure care permit places restrictions on future use requiring that no activities be allowed to disturb the integrity of the final cover, liners, etc., unless the permittee can demonstrate to the NMED, by petition for a permit modification, that the disturbance:

1. is necessary to the proposed use of the property and will not increase the potential hazard to human health or the environment; or
2. is necessary to reduce a threat to human health or the environment.

(Hoditschek)

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Enclosed with this letter is a description of the SVE well system proposed for installation including construction diagrams. The description is provided by Engineering Science, Inc. (ES). ES has been selected to assist PNM in the preparation of the CMP and construction of the selected remedial system. The SVE well will be placed through the center of the concrete cap adjacent to but not through the original abandoned tank. This location represents the approximate center of the underlying contaminated soil.

The SVE well installation will be such that no leakage of surface water can occur down and around the well which might serve to drive contaminants lower in the vadose zone. Also, any air release of contaminants will be in accordance with Bernalillo County air emission regulations. Since the system is designed to remediate the vadose zone area it should serve to reduce the threat to the environment by reducing the potential for buried contaminants to reach the underlying ground water.

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

Sincerely,



Ron D. Johnson
Sr. Environmental Scientist

RDJ:rdj
enclosures

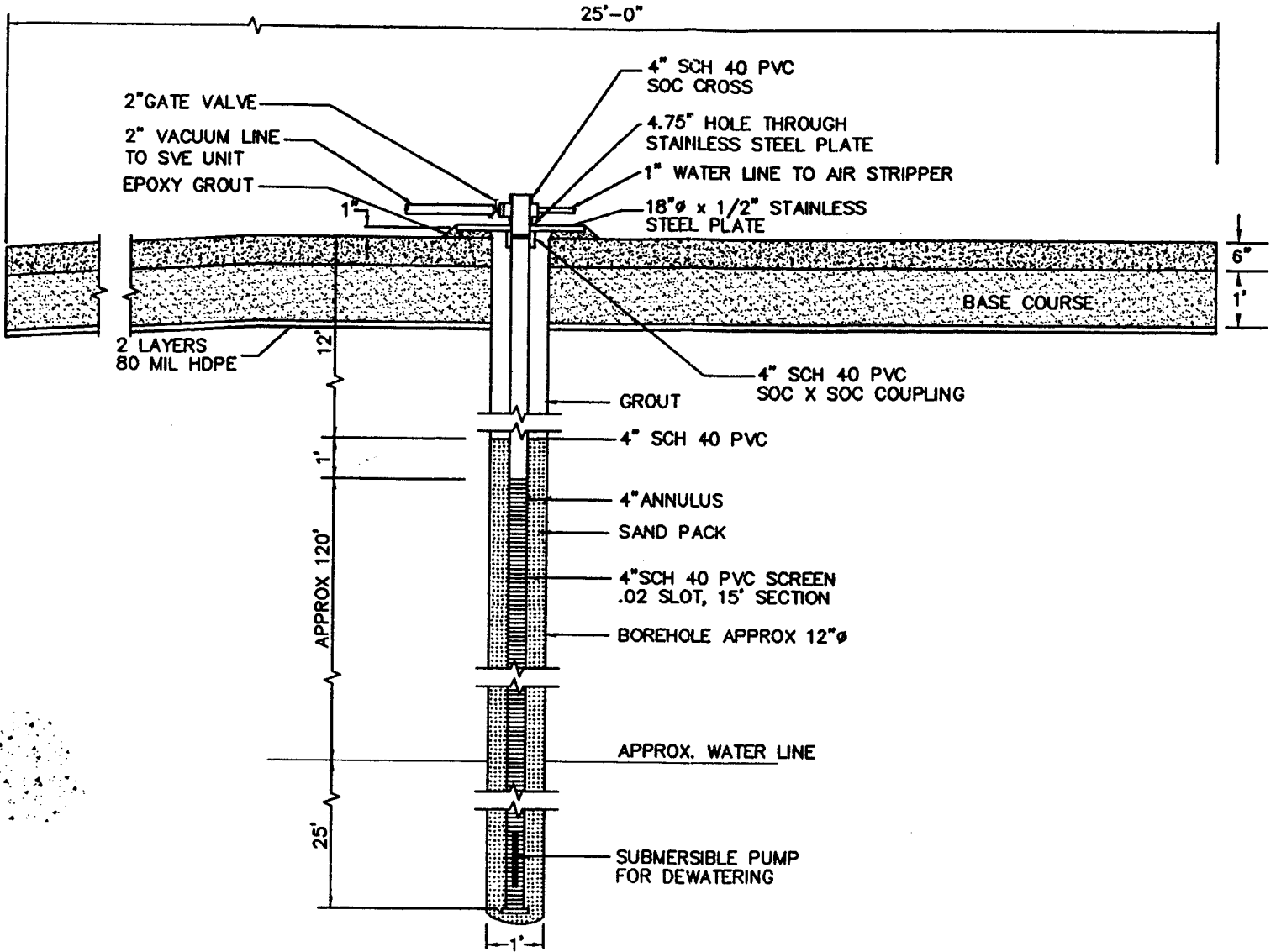
PERSON TSDF CAP

1. Engineering-Science, Inc. (ES) believes that the majority of the soil contamination is located directly beneath and adjacent to the waste oil storage tank. While only a small quantity of soil is contaminated with VOC's, it is a potential source of groundwater contamination. The ES approach to site remediation is the use of soil vapor extraction (SVE) to remove VOCs from the soil, and air strippers to treat the groundwater pumped to the surface. The most rapid and effective way to do this is to place a dual-purpose well in the center of contamination. The most contaminated soil and groundwater will be treated first. This will effectively reduce the source of groundwater contamination. This approach will require drilling a hole through the concrete cap so that the well can be placed through the center of the contamination source to most efficiently remove remaining soil contamination beneath the tank.

2. A 12" diameter hole will be carefully cut through the concrete and the polyethylene liner using a concrete coring tool. A 4" diameter, schedule 40, PVC well will be placed inside the hole to a depth of 25' below the water table. Several steps will be taken to insure that the Treatment Storage Disposal Facility (TSDF) will not be contaminated during drilling or operation. First, the vacuum and water lines will be placed above ground to reduce the amount of concrete removal and disturbance to the cap. Secondly, an 18" diameter, 1/2" thick stainless steel plate will be placed as a sealed collar around the well top. Figure 1 shows how this plate will be sealed with an epoxy grout to prevent surface water from entering the hole. Thirdly, the PVC pipe will be sealed and encased in a 4" wide annulus of grout to a depth of 12' below the surface. This will prevent any surface water from entering the TSDF even if the epoxy seal failed. Finally, all of the drill cuttings will be properly drummed and disposed of. Figure 1 shows the design of the vapor extraction dewatering well that will be used at this site to prevent surface water from penetrating the existing cap.

3. Installation of the well will provide a means of using SVE to remediate the most contaminated soil. The well will also be used to pump groundwater to the surface for treatment. Information gathered during the operation of this system will be used to optimize the full-scale design and operation of the pumping and treatment system to be used for the remaining plume area. Substantial savings in construction, operation and maintenance will be a result of using this dual-purpose well. Placing a dual-purpose SVE/groundwater extraction well through the center of the contamination source will significantly enhance the efficiency of contaminant removal because it will minimize the distance that contaminants must travel to enter the recovery well.





SECTION A



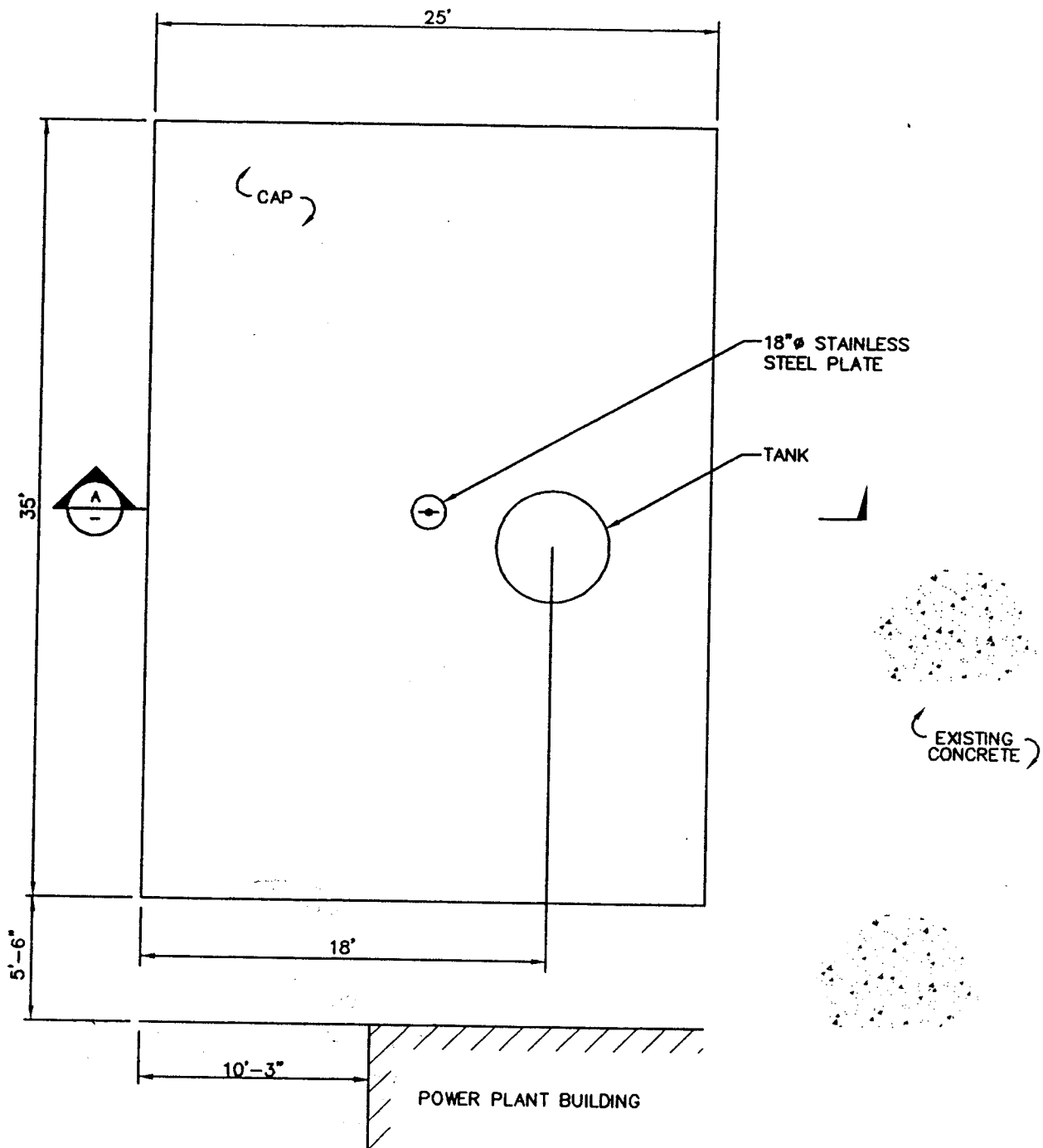
SCALE: 3/8" = 1'-0"

FIGURE 1

TYPICAL VAPOR EXTRACTION DEWATERING WELL (VEW)

ENGINEERING-SCIENCE, INC.

Denver, Colorado



WASTE OIL TANK COVER



SCALE: 1" = 7'-0"