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Person Station Corrective Action Directive (CAD)  
and Corrective Action Program (CAP)  
Status Report  
(NMT 360010342)

Work Completed September 4, 1995 through September 8, 1995

1. Monday 9/4. Holiday. No activity.
2. Tuesday 9/5. PSMW-27-600: Continued well development, air lift pumped for 16 hours at 3.5 gpm, 3360 gallons (5560 gallons total development).  
Tuesday 9/5. PSMW-27-Cluster: Excavated area for vault and drain line installation.
3. Wednesday 9/6. PSMW-27-600: Completed well development, air lift pumped for 16 hours at 3.5 gpm, 3360 gallons (8920 gallons total development).  
Wednesday 9/6. PSMW-500: Continued well development, air lift pumped for 8 hours at 2.5 gpm, 1200 gallons (1400 gallons total).  
Wednesday 9/6. PSMW-27 Cluster: excavated pit, set forms for walls and floors.  
Wednesday 9/6. VEW: Started up soil vapor extraction system for one week of operation.
4. Thursday 9/7. PSMW-27-500: Continued well development, air lift pumped 24 hours at 2.5 gpm, 3600 gallons (5000 gallons total development).  
Thursday 9/7. PSMW-27-Cluster: Poured concrete for walls and floor of vault.
5. Friday 9/8. PSMW-27-500: Completed well development, air lift pumped 14 hours at 2.5 gpm, 2100 gallons (7100 gallons total development).  
Friday 9/8. PSMW-27-400: Continued well development, air lift pumped 10 hours at 2.7 gpm, 1620 gallons (1820 gallons total development).
6. Saturday 9/9. PSMW-27-400: Continued well development, air lift pumped 24 hours at 2.7 gpm, 3888 gallons (5708 gallons total development).
7. Sunday 9/10. PSMW-27-400: Continued well development, air lift pumped 6 hours at 2.7 gpm, 972 gallons (6680 gallons total development).

Work Scheduled for September 11, 1995 through September 15, 1995

1. Pump and Treat System: Continue operation under an emergency pumping permission from State Engineer office until water rights application for transfer finalized.

2. Phase II Implementation:

Currently waiting on response from Ethicon, Inc. on proposed access for trenching and piping from wells PSMW-24, PSMW-25, and PSMW-26.

EW-1 is operational and part of the pump and treat system.

3. VEW System:

System is operational under a pulsed mode recommended by Parsons-Engineering Science, Inc. (PES) has recommended operation of VEW system in a pulsed mode i.e., one week of operation followed by 3 weeks of system recovery. Cycle would then be repeated. PES feels that optimum recovery with minimum operational costs would be achieved with this pattern. System is currently in operation: September 6 through September 13.

4. Deep Plume Investigation:

Continue installation of PSMW-27-Cluster (a 3 level cluster well to be installed on Ethicon property near monitor well PSMW-27, with sampling intervals at 400 feet, 500 feet, and 600 feet nominally below ground surface). Scheduled for this week: Complete well development of 27-400, complete installation of vault, cut off well casings to slightly below ground level inside vault, install packers and pumps.

#### Corrective Action Program (CAP) Update

1. Air Permit (Modification): 100 % complete.

On April 20, 1995, PNM submitted a request to the Albuquerque Air Pollution Control Division (Division) to modify the existing air permit for the CAP. The modification is needed to facilitate a change in air stripper location for the Phase II pump and treat program. (Originally it was felt a second air stripper would be located at a separate location, now it will be located in the same building with the first air stripper). On May 25, 1995, the Division approved PNM's requested revision. The Division also formalized the requirement to use EPA methods 18 and 25 for compliance determination of non-methane hydrocarbons (instead of the TO-14 method we had previously used). Kramer and Associates, Inc., was on site to conduct the necessary testing August 16-18, 1995. PNM is waiting for results of testing.

2. Water Rights Modification: In progress.

PNM has pending before the State Engineer's office a request to relocate the diversion point for existing PNM water rights to the Person Station location. Pump and treat activities are currently proceeding under an emergency request approved by the State Engineer. The publication of the notice and comment period for the request are now complete. No comments or protests were received by the State Engineer's office. A hearing on the request may now be scheduled by the State Engineer's office (this may be waived). PNM is waiting on expected approval.

### 3. Phase II Installation: In progress.

Phase II entails the installation of one new extraction well (EW-1 located between the VEW and PSMW-16), and the conversion of PSMW-24, PSMW-25, and PSMW-26 from monitor wells to extraction wells.

EW-1 installation is complete and the well became an operational component of the pump and treat system on August 14.

Conversion of PSMW-24, PSMW-25, and PSMW-26 will require approval from Ethicon, Inc., to allow trenching and installation of piping, etc. A meeting with Ethicon, Inc. was conducted on Monday, May 22. PNM has provided Ethicon, Inc. with a written proposal for the work. PNM also mailed, on June 29, a copy of the draft revision to the existing access agreement between PNM and Ethicon to allow installation and maintenance of the converted wells (as well as continuing access to existing monitoring wells). This is currently under review by Ethicon, Inc.

Phase II also required the installation of an additional air stripper and associated piping. An air permit modification has been approved, and the second air stripper has been installed and has been operated.