



BILL RICHARDSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
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PNM 2003



RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 4, 2003

Mr. John Hale, P.E.
Technical Project Manager
Public Service Company of New Mexico
2401 Aztec NE
MS Z160
Albuquerque, NM 87107

**SUBJECT: NOTICE OF DEFICIENCY: RCRA POST-CLOSURE CARE PERMIT
MODIFICATION REQUEST, REMOVAL OF SOLID WASTE
MANAGEMENT UNITS, CLASS 3 PERMIT MODIFICATION
PERSON GENERATING STATION MARCH 2003
PUBLIC SERVICE COMPANY OF NEW MEXICO,
EPA ID NMT360010342
TASK # HWB-PNM-01-099**

Dear Mr. Hale:

The New Mexico Environment Department (NMED) has received the subject document dated March 2003, requesting a Class 3 permit modification to the Person Generating Station RCRA post-closure care permit. The Hazardous Waste Bureau has determined that additional information is required for consideration prior to granting approval of the Class 3 Permit Modification.

Please supply the following information.

General Comments:

1. Page 2, Section 3.0 – It appears that the wrong citation is referenced;
2. Page 3 – Please provide the date on which the public notice was run;
3. Attachment 2, RCRA Subtitle C Site Identification Form – Item 10.A.3 should be checked due to treatment activities ongoing at the Facility;
4. In accordance with 20.4.1.900 NMAC (incorporating 40 CFR 270.13(l)), PNM should submit a topographic map extending one mile beyond the property boundaries which includes all required items in 270.13(l);
5. Page 7, Section 4.2.9 – This paragraph mentions that the financial assurance instrument for post closure care is addressed in Permit Condition II.E, the referenced Permit Condition should be III.E;
6. Please provide the PNM site background chromium levels.

Natural Pit Area (NPA):

1. With reference to the Natural Pit Area (NPA), NMED requests that PNM collect a sample for total chromium analysis from the Groundwater Treatment System (GTS) influent groundwater;

Spin-Off Filter Area:

1. Page 12, Section 4.2.12.2 – The text mentions that any soil that was visibly contaminated with petroleum hydrocarbons would have been removed from the Spin-Off Filter Area during NPA excavation operations. Please provide a drawing illustrating the lateral extent of the total NPA excavation;
2. Page 12, Section 4.2.12.2 - Please provide the TPH sampling locations and sampling results from the Spin-Off Filter Area;
3. PNM should sample the soil in the Spin-Off Filter Area for VOCs, SVOCs, and RCRA metals using approved EPA SW-846 methods;
4. Please provide the disposition of the filters that were stored in the area, if known;

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Leach Fields:

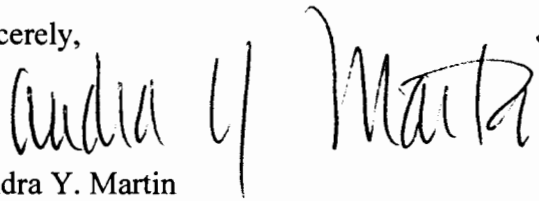
1. PNM should sample the soil in the four leach fields for VOCs, SVOCs, and RCRA metals using approved EPA SW-846 methods. A minimum of four samples per leach field is recommended;

Boneyard:

1. Please provide information as to whether any equipment that was stored in this SWMU contained or came in contact with any types of solvents. If there is evidence that this occurred, soil samples for VOCs, SVOCs, and RCRA metals analysis using approved EPA SW-846 methods shall be required.

If you have any questions regarding this letter, please contact Robert Warder of my staff, at (505) 841-9040.

Sincerely,



Sandra Y. Martin
Acting Chief
Hazardous Waste Bureau

SYM:rw

cc: John Kieling, NMED HWB
Will Moats, NMED HWB
Robert Warder, P.E., NMED HWB
L. King, EPA Region 6 (6PD-N)

File: PNM 01-099 and Reading File