

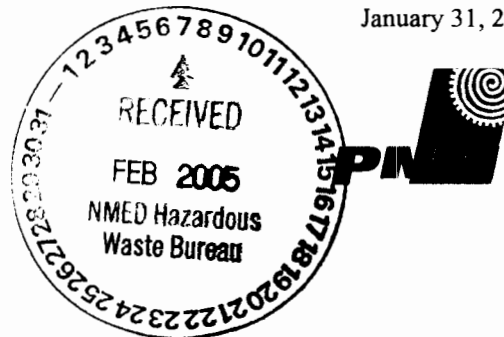
Public Service Company
of New Mexico
2401 Aztec, NE
Albuquerque, NM 87107
Fax 505 855-6320

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January 31, 2005

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Carolyn Cooper
New Mexico Environment Department
Hazardous Waste Bureau
2905 Rodeo Park Drive East
Santa Fe, NM 87505



**RE: Person Generating Station (NMT 360010342) – RCRA Post-Closure Care Permit
Modification Request, Supplemental Information**

Dear Ms. Cooper:

Public Service Company of New Mexico (PNM) is submitting the following comments and information as requested in the Notice of Deficiency letter from the New Mexico Environment Department Hazardous Waste Bureau (HWB), dated September 4, 2003.

General Comments:

1. As was noted in the HWB letter, the incorrect citation was referenced on page 2, Section 3.0. The correct citation is 40 CFR 270.42(c)(2).
2. The public notice was published in the Albuquerque Journal on March 21, 2003.
3. Enclosed as Attachment A is a corrected copy of the RCRA Subtitle C Site Identification Form with treatment activities checked.
4. Enclosed as Attachment B are three maps, which provide the information required by 20.4.1.900 NMAC (incorporating 40 CFR 270.14(I)). The topographic map illustrates wells and surface water bodies. The second map illustrates the location of the solid waste management units (previously included in the modification request document). The third map illustrates the locations of the groundwater monitoring wells, extractions wells, and the treated effluent discharge location.
5. As was noted in the HWB letter, the incorrect permit condition was referenced. The correct permit condition is III.E.
6. During the RCRA Facility Investigation that was conducted in August 1989, extensive soil sampling of the Natural Pit Area and selected surrounding areas occurred. Four background samples were collected for total chromium analyses from areas outside the RCRA facility boundary on August 1, 1989.

The soil samples were collected at 1-foot intervals down to a total depth of 5 feet. The average for all four soil samples ranged from 2.95 mg/kg in the 2- to 3-foot interval to 4.50 mg/kg in the 0- to 1-foot interval.

Natural Pit Area (NPA):

1. Enclosed as Attachment C is the analytical report for the total chromium sample collected from the GTS influent. As the report indicates, the total chromium concentration in the sample was 0.0080 mg/l, well below the New Mexico Water Quality Control Commission standard of 0.05 mg/l.

Spin-Off Filter Area:

1. PNM has provided several reports to the HWB in the past regarding work activities conducted at the NPA and the Spin-Off Filter Area. If necessary, PNM can provide copies of these reports to the HWB again. However, in an effort to expedite this request, PNM has included copies of some previously submitted information in Attachment D.

The attached figure shows the pre-excavation extent of the NPA and the adjacent spin-off filter area. Also included in Attachment D is a copy of the November 1998 report titled, Closure Report: PNM Person Generating Station Hazardous Waste Storage Facility – Natural Pit Area NMT360010342. This report was previously provided to the HWB in support of PNM's request for a No Further Action determination.

2. Table 3 on page 2-17 of the above-referenced closure report shows the concentrations of total recoverable petroleum hydrocarbons in the soil after completion of NPA excavation activities. As the table indicates, the concentrations are insignificant.
3. As a result of past construction activities, substantial earthwork and grading has occurred in the Spin-Off Filter Area (as well as the entire facility). Consequently, an accurate delineation of the Spin-Off Filter Area is no longer possible. However, PNM collected one composite soil sample from the area that generally comprised the Spin-Off Filter Area. As requested by the HWB, the sample was analyzed for volatile organic compounds (EPA Method 8260), semi-volatile organic compounds (EPA Method 8270), and RCRA total metals (EPA Methods 6010B and 7471A).

As the analytical report indicates, the sample was non-detect for volatiles and semi-volatiles. Results for the eight RCRA metals analyses indicate low concentrations of arsenic, barium, chromium, and lead. Although the analyses were performed using a totals method, an approximation of the relevant RCRA TCLP standards can be obtained by dividing each total metal concentration by 20. As the table below indicates, the concentrations are well below the respective TCLP concentrations. A copy of the analytical report is included in Attachment E.

Parameter	Total Concentration (mg/kg)	TCLP Approximation Concentration (mg/L)	RCRA TCLP Standard (mg/L)
Arsenic	2.0	2.0/20 = 0.10	5.0
Barium	65	65/20 = 3.2	100
Cadmium	BDL	-	1.0
Chromium	6.2	6.2/20 = 0.31	5
Lead	6.8	6.8/20 = 0.34	5
Selenium	BDL	-	1.0
Silver	BDL	-	5.0
Mercury	BDL	-	0.2

BDL: Below Detection Limit

4. The final disposal locations of all the oil filters are unknown. Some of the oil filters were disposed of with the excavated petroleum-contaminated soil at the Waste Management Landfill, located in Rio Rancho, NM. Other oil filters may have been disposed of in Person Generating Station solid waste collection bins, which was consistent with the relevant regulations at that time.

Leach Fields:

1. Although there was no evidence to indicate that non-sanitary wastewater discharges had occurred to the facility leach fields, the NMED requested that PNM conduct investigations into the four abandoned leach fields located at the Person Generating St.

PNM determined that one of the four leach fields was not associated with the Person Generating St., but rather the adjacent PNM power operations office building. This facility consists of offices only and, therefore, would have only received sanitary wastewater. Consequently, soil sampling activities were only conducted on three leach fields.

The results of the investigation are presented in the attached report titled, Leach Field Investigation, Public Service Company of New Mexico, Person Generating Station (Attachment F). As the report indicates, analytical results for the soil samples collected from the three leach fields were non-detect for volatiles and semi-volatiles analyses. The RCRA metals analytical results indicate low concentrations in the soil samples, which can be attributed to naturally occurring background levels.

Boneyard:

1. PNM is unaware of any solvent use or storage of solvents that occurred in the boneyard area. Consequently, no soil sampling was conducted in this area.

If you have any questions, please contact me at (505) 855-6392.

Sincerely,



John Hale, P.E.
Technical Project Manager

Enclosures

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ATTACHMENT A

10. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. See instructions on pages 28 to 32)

A. Hazardous Waste Activities

1. Generator of Hazardous Waste (choose only one of the following three categories)

- a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or
- b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or
- c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities (check all that apply)

- d. United States Importer of Hazardous Waste
- e. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 6, check all that apply:

- 2. Transporter of Hazardous Waste
- 3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.
- 4. Recycler of Hazardous Waste (at your site) Note: A hazardous waste permit may be required for this activity.
- 5. Exempt Boiler and/or Industrial Furnace
 - a. Small Quantity On-site Burner Exemption
 - b. Smelting, Melting, and Refining Furnace Exemption
- 6. Underground Injection Control

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):

	Generated	Accumulated
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

- 2. Destination Facility for Universal Waste
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

- 1. Used Oil Transporter - Indicate Type(s) of Activity(ies)
 - a. Transporter
 - b. Transfer Facility
- 2. Used Oil Processor and/or Re-refiner - Indicate Type(s) of Activity(ies)
 - a. Processor
 - b. Re-refiner
- 3. Off-Specification Used Oil Burner
- 4. Used Oil Fuel Marketer - Indicate Type(s) of Activity(ies)
 - a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
 - b. Marketer Who First Claims the Used Oil Meets the Specifications

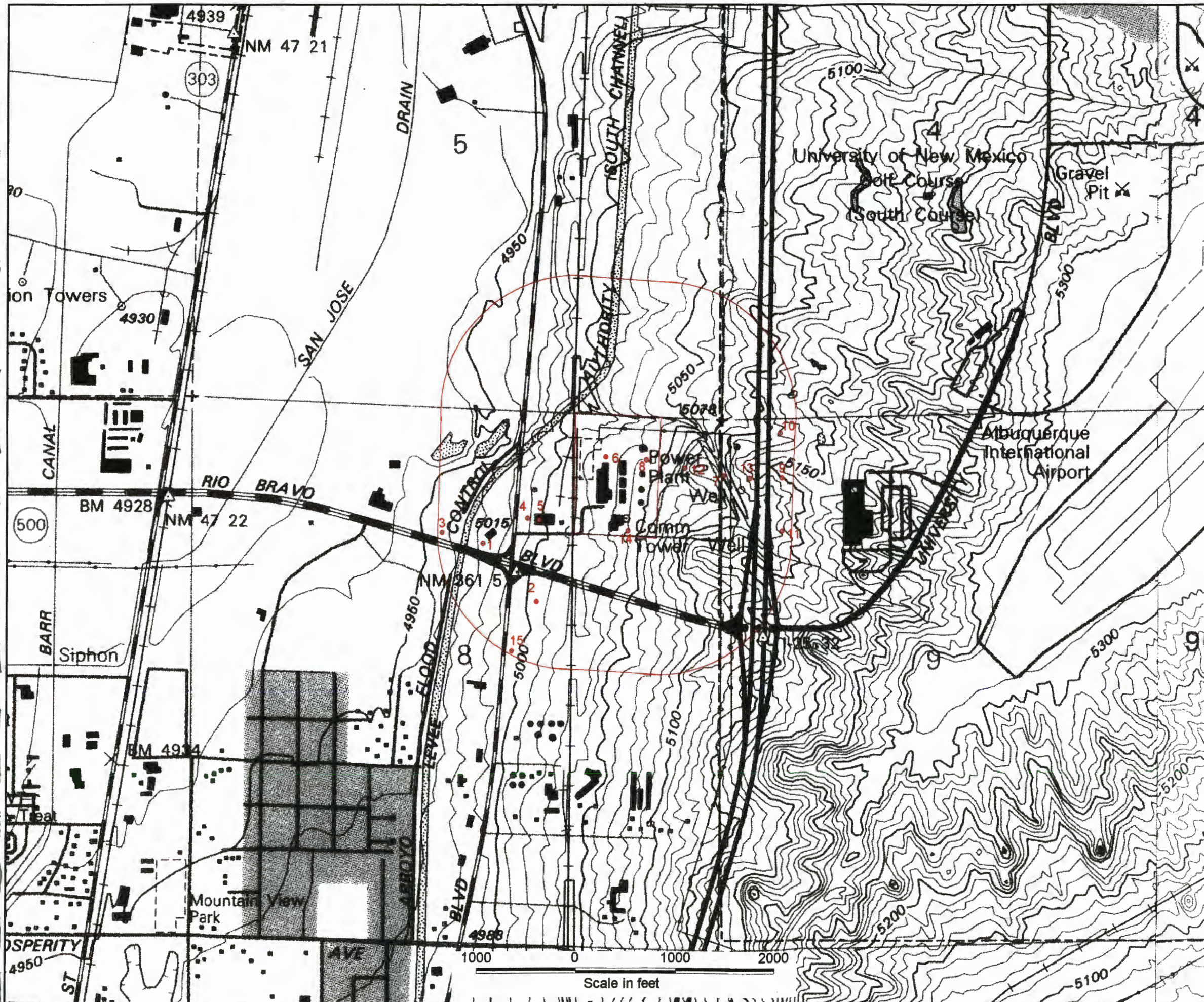
11. Description of Hazardous Wastes (See instructions on page 33) See HW Permit Information Form, Item 10.

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

N/A						

ATTACHMENT B

**TO VIEW THE MAP AND/OR
MAPS WITH THIS DOCUMENT,
PLEASE CALL THE
HAZARDOUS WASTE BUREAU
AT 505-476-6000 TO MAKE AN
APPOINTMENT**



LEGEND

- Water Supply Well
- 1/4 Mile Perimeter

METRIC
CORPORATION

WATER WELLS with in 1/4 MILE of
PNM-PERSON STATION

BERNALILLO COUNTY, NEW MEXICO

27 Oct. 2003

FIGURE



LEGEND

LEGEND: **PERSON GENERATING STATION**

- ▲ Shallow Groundwater Monitor Wells
- Deeper Groundwater Monitor Wells
- Extraction Wells

PSMW-17C	PSMW-19C	PSMW-21C	PSMW-22C	PSMW-24C	PSMW-25C	PSMW-27C
PSMW-17-300	PSMW-19-300	PSMW-21-400	PSMW-22-400	PSMW-24-400	PSMW-25-400	PSMW-27-400
PSMW-17-400	PSMW-19-400	PSMW-21-500	PSMW-22-500	PSMW-24-500	PSMW-25-500	PSMW-27-500
PSMW-17-500	PSMW-19-500	PSMW-21-600	PSMW-22-600	PSMW-24-600	PSMW-25-600	PSMW-27-600
PSMW-17-600	PSMW-19-600	PSMW-21-700	PSMW-22-700	PSMW-24-700	PSMW-25-700	PSMW-27-700
PSMW-17-700	PSMW-19-700	PSMW-21-800	PSMW-22-800	PSMW-24-800	PSMW-25-800	PSMW-27-800
PSMW-17-900	PSMW-19-900	PSMW-21-900	PSMW-22-900	PSMW-24-900	PSMW-25-900	PSMW-27-900

500 0 500 Feet

AERIAL PHOTOGRAPH - SEPTEMBER 2002

