GE Power Generation

Apparatus Service Department
General Electric Company
1 River Rd., Bldg. 5, 2nd Floor, Schenectady, NY 12345

Bldg.6, Room 211
Tel. (518) 385 0545

XI

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Section Chief, Technical Section (6H-CX)
RCRA Enforcement Branch (6H-C)
United States Environmental
Protection Agency
1445 Ross Avenue
Dallas, Texas 75202-2733

Kathleen O'Reilly (6H-CX)
United States Environmental
Protection Agency
1445 Ross Avenue
Dallas, Texas 75202-2733

Boyd Hamilton
State of New Mexico
Environmental Improvement Division
Harold Runnels Bldg.
1190 St. Francis Drive
Santa Fe, New Mexico 87503

Subject: **Monthly Progress Report 6**
General Electric Consent Decree
Civil Action No. 87-1073-jb

On December 14, 1989, a meeting was held at the New Mexico Environmental Improvement Division offices to review submitted RFI Workplan. Participants in the meeting were:

Kathleen O'Reilly, EPA Region 6
Boyd Hamilton, New Mexico Environmental Improvement Division
Jens Deichmann, PRC Environmental Management, Inc.
Barry Sims, PRC Environmental Management, Inc.
Barry York, General Electric
A. David Alcott, Law Environmental, Inc.

The discussion at the meeting included agency concerns over the adequacy of previously obtained data, the effectiveness of removing the dry well materials and site soils as interim measures; and General Electric concerns that activities performed for the EPA approved RFI Workplan will have to be repeated to satisfy NMEID Closure investigation requirements.

The following is an outline of our understanding of the additions and changes to be incorporated in the RFI Workplan by January 15,1989.

1. A boring will be drilled not further than 5 feet west of the dry well structure. This boring will be advanced with a hollow stem auger to a minimum depth of 25 feet below the estimated depth (12 feet) of the dry well. Drive spoon samples will be collected at depths of 12 to 14 feet, 17 to 19 feet, 22 to 24 feet, 27 to 29 feet, 32 to 34 feet, and 37 to 39 feet. Appendix IX analyses (40CFR 264) will be performed on the samples collected from 12 to 14 feet, 22 to 24 feet, and 32 to 34 feet. Analyses for Hazardous Substances will be performed on the samples obtained at 17 to 19 feet, 27 to 29 feet, and 37 to 39 feet. Drilling and sampling procedures and sample collection, preservation and shipment procedures will be as described in Appendix A (Section 2.1). A representative portion of the sample collected from each depth interval will be screened using a gas chromatograph set up at the facility. Equipment screening techniques will be as described in Appendix A (Section 2.2) of the RFI Workplan. If the GC analyses of the sample collected from 37 to 39 feet indicates the presence of the selected analytes (Table 1), the boring will be extended to greater depths, being sampled at 5 foot intervals. As long as field screening indicates that the selected analytes are present, the boring will be continued. Laboratory chemical analyses will be performed for Hazardous Substances at depth intervals of approximately 10 feet. The stratigraphy and and chemical analyses of samples obtained in this boring will be evaluated. From this evaluation, a set of indicator chemicals will be proposed by GE for EPA approval to be used for further soil sampling analyses.

2. One additional boring will be added for a total of 5 initial perimeter borings around the dry well to minimum depths of 30 feet. The minimum depth may be adjusted based on laboratory analyses obtained from the center boring adjacent to the dry well. The scope of additional exploration to define the limits of the area impacted by releases into and in the immediate vicinity of the dry well will be proposed based on the field screening results from the initial 5 borings (Section 3.1.3.1).

3. One boring will be deleted resulting in a total of four borings to a depth of 20 feet to evaluate stained soil areas (Section 3.1.3.2).

4. Shallow soil samples will be obtained on a grid approximately 40 feet square within the property boundaries at depths of 0 to 6 inches and 12 to 18 inches. Analyses of these shallow samples will be for PCBs and indicator chemicals and may use a compositing strategy for applicable constituents. Samples will not be obtained under structures of original construction.

5. The following statement will be included in the Section 3.1, Vadose Zone Investigation "If significant contamination is found in the site soils vadose zone monitoring may be necessary".

6. The SCHEMATIC FOR TYPICAL MONITORING WELL, Figure C-2, Appendix C will be corrected to depict double casing.

7. Protective barriers will be specified for the monitoring wells (Section 3.2.2).

A letter response to the EPA document reviews on the INTERIM MEASURES WORKPLAN and the DESCRIPTION OF CURRENT CONDITIONS was submitted on December 15, 1989. Removal of dry well materials and site soils has been deleted from the interim measures activities.

The applicable pages of the RFI DESCRIPTION OF CURRENT CONDITIONS and RFI WORKPLAN are being revised to include the above additions and changes. The schedules are also being revised to reflect changes in scope. Contractors are being notified and, based on prompt agency approval, activities are planned to start on site in February.

Very truly yours,

Barry York
Environmental Project Manager

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cc: Office of Regional Counsel, USEPA, 1445 Ross Ave., Dallas, Texas 75202-2733
AD Alcott, Law Environmental, Inc., 112 Townpark Drive, Kennesaw, GA., 30144-5599
PRC Environmental Management, Inc., American Financial Center, Bldg.4, Suite 225, 2400 Louisiana Blvd.NE, Albuquerque, NM 87110
JT Harrsen, GE, Schdy
GR Logan, GE, Schdy
WP Thornton, GE, Schdy