UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
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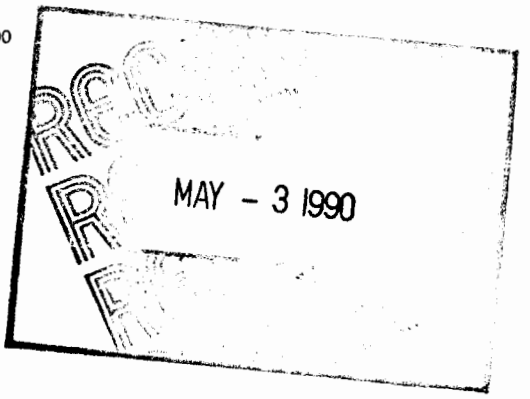

May 1, 1990

Mr. Boyd Hamilton
Program Manager
Hazardous Waste Section
Hazardous Waste Bureau
Environmental Improvement Division
1190 St. Francis Drive
Santa Fe, NM 87503

XIII

Dear Mr. Hamilton:

Per our telephone conversation on 4/27/90, attached is the list of selected indicator compounds that we discussed regarding the General Electric Apparatus Service (GE) Shop in Albuquerque, New Mexico. These selected compounds are based on data previously collected by General Electric and the Environmental Protection Agency (EPA). These data are intended to satisfy RCRA Facility Investigation Requirements (RFI) of EPA and closure requirements of NMEID.

As designed by NMEID, EPA, and GE, the most recent sampling event (March 1990) was focused on collecting data that allows the selection of indicator compounds. Depending on the closure options proposed by General Electric and pending RFI results, this RFI effort should satisfy a substantial portion, if not all, requirements for closure data collection. Verification sampling following any corrective action will of course have to be performed by GE.

Split samples were collected by EPA during the event and analyses compared favorably with data collected by GE. The selection of indicator compounds provides an efficient and accurate means of identifying the extent of contamination at the GE facility.

During the March sampling, several of the benzenes, ethylbenzene, xylene and PCBs were detected, and a few of the semivolatile compounds.

The selected indicator compounds that NMEID and EPA developed, based on GE's proposal, is attached. These shall not be composite samples.

I have received NMEIDs faxed concurrence on this matter. I appreciate NMEID's prompt response on this list, as we discussed. GE has verbally agreed to these analyses.

You've been most helpful on this project and EPA appreciates your cooperative attitude!

Sincerely,

Kathleen L. O'Reilly
Geologist
Technical Section (6H-CX)
RCRA Enforcement Branch

cc: Jack Ellvinger, NMEID
Bill Luthans (6H-PS)
Barry York, GE
Barry Sims, PRC

Indicator compound selection:

Proposed by GE	Counter proposal by EPA
1. BTEX - Method 8020	It is not clear whether GE intends to analyze for all components indicated in Method 8020 or just benzene, toluene, ethylenzene, and xylene. All compounds identified in Method 8020 need to be analyzed for and reported.
2. Polychlorinated biphenyls (PCB's) Method 8080	Method 8080 also includes pesticides. Analysis need not be done for pesticides. PCB's should be reported separately, not additively.
3. Volatile organic analysis VOA's - Method 8240	The only contaminants from the volatile group that were detected are xylene, ethylbenzene, and methylene chloride. Methylene chloride was detected at 8 ppb and does not appear to be a problem. The other compounds will be detected using Method 8020. EPA does not believe analysis for VOA's is necessary.
4. Not proposed by GE	Base neutral extractables - Method 8270. EPA proposes that GE analyze for a select group of BNAs to include only the chlorobenzenes. Chlorobenzene analyses shall include at least: 1,2-Dichlorobenzene, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, 1,2,4-Trichlorobenzene, and 1,2,4,5-Tetrachlorobenzene. Split samples which EPA will collect are to be analyzed for the entire suite of semi-volatiles.