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Subject: **Monthly Progress Report 18**
General Electric Consent Decree
Civil Action No. 87-1073-jb

Percentage of RFI completed - 95%
Percentage of CMS completed - 35%

RFI

EPA approval of the final RFI Report was received, contingent upon additional data collection. GE believes that the data submitted in the report fulfills the goals established for the RFI. The data does not indicate that there is a significant threat to human health or the environment and is adequate to conduct the Corrective Measures Study. However, in order to expeditiously complete this project, GE will conduct additional soil sampling and analyses to further define the extent of constituents in the vicinity of Dry Well No. 2. The proposed additional data collection specifying sampling locations, analyses, and schedule is attached as "WORKPLAN FOR SUPPLEMENTAL SOIL ASSESSMENT".



CMS

A Corrective Measures Study begins by identifying those conditions which require corrective action and then evaluating various approaches to correction by reference to their feasibility, effectiveness and cost. Updated site conditions have been compared with regulatory guidelines to establish the requirements and specific objectives of corrective measures.

Review of site-specific exposure conditions, as identified in the RFI, shows that air and surface water are very unlikely pathways for constituent migration to potential receptors. Evaluation of data obtained during the RFI indicates that ground water has not been impacted by the release of constituents at this site. Modeling of contaminant transport through the vadose zone to ground water at 260 feet below ground surface has been performed using two common analytical models - Seasonal Soil Compartment Model (SESOIL4) and US EPA's 1986 Technical Methods for Calculating Time of Travel in the Unsaturated Zone. The time of travel studies indicate that the time required for the most mobile of the detected constituents to reach ground water is measured in thousands of years. The SESOIL models results show that the constituents will not migrate through the clayey strata which occur at different levels in the soil profile.

Review of the concentrations of constituents detected in site soils indicate that only PCBs were reported at levels which exceed the action levels contained in the proposed Subpart S Rule which would trigger the necessity for corrective action. The Subpart S document also states that action levels and cleanup standards specified under TSCA are applicable to RCRA corrective action for PCBs in soils. There are constituents present on site for which action levels are not available. For these constituents a health-based risk evaluation was performed considering site-specific exposure conditions. This study shows that the presence of the constituents does not present an unacceptable health risk to employees or personnel authorized to be on the site. Therefore, with the exceptions stated below, since there appears to be no need for corrective action - no CMS is required.

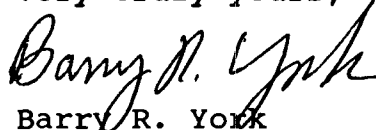
However, in the Closure Plan submitted to New Mexico Environmental Improvement Division it was specified that GE would excavate the dry well structure(s), contained solidified material, and connected drain lines and remove them to appropriate qualified disposal. The Closure Plan also specified the removal of soils containing PCB concentrations equal to or greater than 50 ppm or exhibiting RCRA Hazardous Waste Characteristics. GE proposes to do this corrective action and a CMS addressing this work is being prepared.

The CMS will propose remediation of the dry well structures, contained solidified material and connected drain lines as specified in the Closure Plan. The CMS will also propose the removal of soils to the PCB concentration levels specified in 40 CFR 761.125 Requirements for PCB spill cleanup. Due to the limited quantities of materials which will require remediation it is planned to evaluate only excavation and removal to qualified landfills or incineration as corrective measures alternatives. Other alternatives, such as on-site treatment are not cost effective due to the small volume of material requiring treatment, and are deemed no more effective than removal.

PROJECTED WORK

It is anticipated that within the next reporting period, field activities associated with the "WORKPLAN FOR SUPPLEMENTAL SOIL ASSESSMENT" will be completed and a report will be submitted which will include the details supporting the corrective action alternative specified.

Very truly yours,



Barry R. York
Environmental Project Manager

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