

RNCM 93

BOOZ ALLEN & HAMILTON INC.

4330 EAST WEST HIGHWAY • BETHESDA, MARYLAND 20814-4455 • TELEPHONE: (301) 951-2200 • FAX: (301) 951-2255

January 21, 1993

Ms. Allison Abernathy, 5204G
Site Assessment Branch
Hazardous Site Evaluation Division
Office of Emergency and Remedial Response
U.S. Environmental Protection Agency
1235 Jefferson Davis Highway
Arlington, VA 22202



Subject: EPA Contract Number 68-W1-0005, Work Assignment A02
Docket Compilation Support for NPL Update #13

Dear Ms. Abernathy:

Today, the Docket received the attachment to the December 7, 1992 public comment letter from the Mayor of the City of Albuquerque. The one page letter had been logged into the docket as NPL-U13-3-3-3 and NPL-U13-3-4-3. The index was updated to reflect the new page count. Replacement copies of these documents were forwarded to Ms. Rosemary Wisniewski of VIAR and the Region 6 NPL Coordinator per your request.

- Replacement NPL Update #13 Index Pages:
 - Page 4 reflecting the revised page counts
- Replacement Copies of NPL-U13 Public Comments:
 - NPL-U13-3-3-3
 - NPL-U13-3-4-3

Please call me at (202) 260-9374 should you have any questions.

Very truly yours,

Annemarie Senol
BOOZ ALLEN & HAMILTON Inc.

Annemarie Senol
Senior Consultant

Enclosures

cc: Ms. Rosemary Wisniewski, VIAR
✓ U.S. EPA - Region 6 NPL Coordinator



City of Albuquerque

P.O. BOX 1293 ALBUQUERQUE, NEW MEXICO 87103

December 7, 1992

Docket Coordinator
USEPA CERCLA Docket Office
OS 245 Waterside Mall
401 M Street, SW
Washington, D.C. 20460

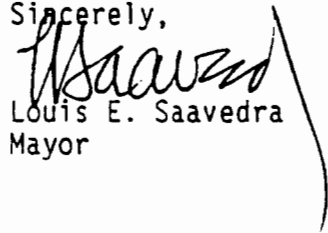
Dear Docket Coordinator:

I am writing to protest the EPA's proposed listing of two additional sites in Albuquerque, the "Old Rinchem Site" and the AT&SF site, for the National Priorities List. I believe that the designation is improper and inappropriate for the reasons outlined below.

1. The ranking of the "Old Rinchem Site" contains a technical error. (See Attachment I). If the scoring is recalculated using correct assumptions, the site will fall below the threshold for the Superfund Priority List.
2. A listing on the National Priorities List causes irreparable social and economic harm to the community far beyond the public health and environmental benefits it proposes to achieve. The listing should not be undertaken without a thorough evaluation of other avenues of accomplishing the clean up. No site should be listed before first showing that listing the site has the greatest net benefit to the community of all the alternatives. Neither of these have been done.
3. We understand that Superfund is a limited fund to be used for those sites which have imminent public health threats and for which there are no responsible parties willing to undertake remediation. In the case of both of these sites, the responsible parties have already willingly spent a great deal of money on defining the problem and are ready to begin remediation. Listing these sites would not only delay the clean-up and increase the cost, but would be an inappropriate use of Superfund when there are other, higher priority sites with imminent public health problems and no willing parties for remediation.

I urge you not to list these sites on the National Priorities List. Instead, I urge the EPA to enter into a pilot program with the responsible parties for each of the sites which will accomplish the same ends in a shorter time frame, with lower costs, and without the economic and social hardship imposed upon the community by the stigma of Superfund.

Sincerely,


Louis E. Saavedra
Mayor

Attachment



COMPANY, INC.

6133 EDITH BOULEVARD NE
ALBUQUERQUE, NM 87107
PHONE (505) 345-3655

RECEIVED
DEC 7 1992
MAYOR/CAO
OFFICE

December 1, 1992

Louis E. Saavedra, Mayor
City of Albuquerque
P.O. Box 1293
Albuquerque, NM 87103

Dear Mayor Saavedra:

A one half to two thirds acre industrial site at 5001 Edith Blvd. NE, in Bernalillo county, New Mexico, has been formally proposed by EPA for addition to the Superfund or National Priority List (NPL). The site was titled by EPA or NMEID as "The Old Rinchem Site." This site, located in the Hahn Industrial Area (perhaps a more appropriate name for the site), should not be confused with the current Rinchem location. For a history of Rinchem's usage of the site see Attachment 1.

The highest level of solvent contamination in any of the five monitor wells used in the 1988 study was 153 parts per billion (ppb) in the water. This had dropped to 69ppb in 1992. These proportions are less than seven ounces and three ounces respectively in one acre foot of water.

The formal proposal on October 14, 1992 to add the site to the NPL occurred because EPA's ranking of the threats to human health and the environment, using a formula called Hazard Ranking System (HRS), exceeded the threshold score of 28.5. A consultant used by EPA rated the site at 42.1, primarily because of a perceived threat of volatile organic solvents from the site contaminating the City of Albuquerque's ground water pumping wells. Representatives of Rinchem Company, Inc. and Albuquerque Environmental Health Department have independently discovered an apparent oversight that would reduce the score to 20.6 and make listing of the site unnecessary. (See Attachment 2)

The primary effect of formal proposal of the site to the NPL is to open a sixty day comment period. EPA desires to receive written, technical comments providing justification for raising or lowering the HRS score for the site. All such comments must be received in quadruplicate prior to December 13, 1992 at Docket Coordinator, Headquarters US EPA CERCLA Docket Office, OS 245 Waterside Mall, 401 M Street SW, Washington, DC 20460. All comments must be addressed by EPA prior to final adjustment of the ranking and the decision to list or not list the site.

Rinchem Company, Inc. has been a leader in Environmental Stewardship in New Mexico for the past 16 years. I have served as Chair of New Mexico Emergency

Management Task Force for 4 years, as a member or chair of the State Emergency Response Commission for 5 years, and as a member of Bernalillo County Groundwater Protection Advisory Committee for 4 years. Other Rinchem employees have served as member of two local emergency planning committees, President and committee chairs of New Mexico Hazardous Waste Management Society and as volunteers in Albuquerque Household Waste collection projects since 1985. The company's Albuquerque facility was the 1992 recipient of the NMED and EPA Region VI Environmental Excellence Award. Further references that will attest to Rinchem's record as an environmentally sound Chemical Services provider may be found in Attachment 3.

Rinchem Company, Inc., while not the owner of the site, has indicated and demonstrated that it is willing to undertake the necessary action to assess the levels of contamination and perform the necessary clean-up. Details of Rinchem's Remedial Investigation Plan are found in Attachment 4. Given Rinchem's level of commitment to clean up the site, and given previous Superfund history, it is expected that listing the site would:

- * Delay the clean-up of the site by years;
- * Increase the cost of clean-up dramatically;
- * Financially impact many small businesses who would be listed as potentially responsible parties, ie. current and past property owners and tenants and their banks, insurers, vendors, and customers;
- * Reduce or eliminate availability of home improvement resources for local property values; and,
- * Bring no new financial resources to compensate for all of the above.

I am confident that Rinchem has the commitment and ability to remediate the site without government intervention. I am just as confident that government involvement will hinder the process and be a detriment not only to Rinchem, but to the residents of the Hahn Industrial Area, the City of Albuquerque and other citizens of New Mexico.

If, after reviewing the enclosed briefing data, you agree, please address comments to EPA requesting that the site score be adjusted as shown in the briefing. If you have questions or concerns regarding this matter please contact me at (505) 345-3655.

We Care,



Bill Moore, President

vc

Enclosure

Attachment # 1

RINCHEM COMPANY, INC. USAGE OF PROPOSED SITE 5001 EDITH BOULEVARD NE ALBUQUERQUE, NM

Rinchem Company, Inc. was organized as a New Mexico Corporation in May 1976. With only two employees, the new firm leased the property at 5001 Edith Blvd. NE. The property was owned by Mr. John Urban of 1007 La Poblana Rd NW in Albuquerque. Mr. Urban had previously operated an electronics assembly business at the site. It had also been used by Scherer Hydraulics and, through April 1976, by Mr. Reggie Baldwin of Baldwin Hydraulics. These three known tenants are of the type known to use the organic solvents sold by Rinchem and found in the soil and ground water on or near the site.

When Rinchem first rented the property it included a 33 x 100 foot warehouse adjacent to a 20 X 40 foot office and a 20 x 60 foot canopy. The soil south of the canopy and west of the warehouse and canopy were stained black and oily. An on-site supply well was located about six feet west and six feet south of the north-west corner of the building. Both Mr. Urban and Mr. Baldwin instructed Rinchem employees not to drink from the on-site well as it was contaminated. Rinchem used bottled drinking water throughout its use of the property. It did use well water for restrooms; and other non ingestion purposes. Used water was distributed below the site surface through the septic system 1each field.

Rinchem engaged primarily in chemical distribution from 1976 through 1983, when the company was sold to its first employee/manager and moved to a newly constructed chemical distribution center about one mile north. The business grew steadily from the two employees generating \$363,000 of revenue in its first twelve months until eight employees (two of whom lived and worked in El Paso) generated \$1,854,000 in 1983. Nearly thirty thousand dollars of 1983 revenues resulted from transportation and brokering of chemical wastes to EPA permitted Treatment Storage and Disposal Facilities.

When Rinchem prepared to move to new facilities in 1983, its Manager contacted Mr. Will Focht of EPA Region VI for instructions on closing the facility in a clean condition. Rinchem followed Mr. Focht's instructions by removing all of its chemicals and other assets, cleaning floors and shoveling stained soil into two 950 gallon tanks for disposal at a permitted hazardous waste facility.

Mr. Robert Lowy of NMEID performed a preliminary investigation at the direction of EPA in November 1983 and documented Rinchem's use of the property. He was

told of Rinchem's cleanup and moving plans and the instructions of Will Focht. Rinchem cooperated with his investigation by pointing out the areas of heavy chemical usage for sampling. When he returned March 1, 1984, all chemicals had been removed and only the tanks of dirt remained. Rinchem's manager told Mr. Lowy, then and in subsequent discussions, that he believed the site was clean, but if contamination were found Rinchem would clean it. .

Mr. Lowy sampled soil from five locations including the stained soil from the tanks stored on a bermed concrete slab. He did ask permission to sample the tanks, but then instructed that they not be moved, preventing their shipment for disposal at a permitted disposal facility. Even though the property was soon sold, the tanks stayed where they were for more than one year in accordance with repeated instructions from NMEID personnel. Between 1985 and 1987 the new owner, Mr. Bobby Ford, of Janco Sheet Metal, spread the dirt as fill in the western third of the site. He claims the NMEID staff told him it was clean and he could dispose of it.

Rinchem received a report in 1985 indicating slight soil contamination, but significant contamination in the on-site supply well. The report stated that the supply well "may be indicative of regional contamination in The Hahn Industrial Area of Albuquerque's North Valley." Mr Lowy said he had assigned it medium priority for further study.

Rinchem's president served as Chair of The New Mexico Emergency Management Task Force (with the chief of the Hazardous Waste Bureau) from 1987 until 1990, as a member, or as Chair, of the State Emergency Response Commission from 1987 through 1992, and as a member of Bernalillo County's Groundwater Protection Advisory Committee from 1988 through 1992. Until a news release in January, 1992 he did not hear of a 1988 study of the site documenting chlorinated solvents at 153 parts per billion and acetone at 71 parts per billion in monitoring wells south of the site.

NMED has apologized for the "blind siding" of Rinchem management and cooperated to the extent their budget, manpower availability and other priorities would allow, but their constraints, along with their requests to participate in the sampling of the monitoring wells have slowed the remediation process significantly. Rinchem has agreed again to perform a Remedial Investigation, Feasibility Study and Remedial Action to prevent contaminated ground water from leaving the site while removing contaminants from the groundwater and soil.

During October and November 1992, Rinchem has accomplished the following:

- * Reviewed NMED/and EPA Documentation relating to the site (totalling approximately 1200 pages).
- * Studied City of Albuquerque AGIS documentation of the site and surrounding area (approximately 300 pages).
- * Documented and analyzed Rinchem use of the property.

- * Sampled, analyzed, and documented current volatile and semi volatile organic contamination in five NMED 1988 monitor wells.
- * Analyzed and documented significant changes in local ground water flow between 1988 and 1992.
- * Installed six additional groundwater monitor wells on or adjacent to the site with the assistance of a hydrogeologic consulting firm and environmental drilling company.

Well sampling and soil boring and testing will continue through mid-December and independent lab results will be arriving through year end. For details of the Remedial Investigation Plan see Attachment 4.

**RINCHEM COMPANY, INC.
HRS SCORING DECISIONS**

This comment is presented to challenge a basic assumption used in the Hazard Ranking System screening of the site. The evaluator identified two sources for an observed release. "Source one" was contaminated soil. The evaluator did not estimate a hazardous waste quantity for "source one" stating "the actual area of contaminated soil can not be adequately determined with reasonable certainty."

The soil contamination from 1984 and 1988 samples was predominantly on the western third of the site. The area of the site (see reference 9 page 13) is approximately 121'x 265' = 32,065 square feet. Dividing by 34,000 per 40 CFR 300 2.4.2.1.4 and Table 2-5 Hazardous Waste Quantity Evaluation Equations yields a number less than one. Even using the entire area of the site yields a number less than one.

"Source two" was defined by the evaluator as the 400 drums left on site. Since the drums were not left on site as of March 1, 1984 when the soil samples were taken, they are not a second source. If indeed they ever contributed to a release to ground water it was prior to the sampling of soil and is a part of the area calculation above.

Even if source two existed (which it clearly did not) and were rated for a volume of 40 per 40 CFR 300 Part 2.4.2.1.3 and Table 2-5, Part 2.4.2.2 requires adding source One (< 1) and Source Two (40) rounding to the nearest integer (40 or 41) and selecting the corresponding Hazardous Waste Quantity Factor from Table 2-6. The corresponding factor is 1. Because the area of contaminated soil can be estimated as well below the threshold for a higher factor, it would be a significant misuse of the screening tool and overstatement of the risk to use a default factor of 10.

A Hazardous Waste Quantity Factor Value of 1 times the Toxicity/Mobility Factor of 100 yields a Waste Characteristics Factor of 3 rather than 6.

The above calculations reduce the HRS site score to 20.6

**RINCHEM COMPANY, INC.
LIST OF REFERENCES**

1. Gary Yeager
Hazardous materials Coordinator
Sandia National Labs
P.O. Box 5800
Albuquerque, NM
(505) 844-2699

2. Julie Einerson
Director of Safety and Environmental Services
General Electric-Aircraft Engines Division
336 Woodward Blvd. SW
Albuquerque, NM 87102
(505) 765-9367

3. Ozzie Uribe
Director of Environmental Services
El Paso Natural Gas Company
P.O. Box 1492
El Paso, TX 79978-1492
(915) 848-2576

4. Stephen F. Anderson, P.E.
Generation Design Engineer
Public Service Company of NM
Alvarado Square
Albuquerque, NM 87158
(505) 848-2576

5. Milo G. Myers
Hazardous Waste Program Specialist
City of Albuquerque/Environmental Health Department
P.O. Box 1293
Albuquerque, NM 87103
(505) 768-2600

6. Capt. John McArthur
U.S. Army Dugway Proving Ground
ATTN: STEDP Environmental Division
Dugway, UT 84022-5000
(801) 522-3420 or (801) 522-3417

Attachment # 4

RINCHEM COMPANY, INC. REMEDIAL INVESTIGATION PLAN 5001 EDITH BOULEVARD NE

Introduction:

Rinchem's Remedial Investigation for the Industrial site at 5001 Edith Boulevard NE will be a two pronged approach. Task 1 will be to model the plume of volatile organic solvent contamination in the groundwater on and around the site. The extent of the contamination must be measured and estimated with respect to length, width, depth, and concentration. Task 2 will be to find the contaminated soil source (if any) on the site used by Rinchem between 1976 and 1983. Any soil contamination found will be measured and estimated with respect to length, width, depth, and concentration.

Groundwater Modeling:

On October 22 and 23, 1992, Rinchem and New Mexico Environment Department sampled five wells on and around the site. Analytical results are available from that sampling. Results indicate:

- * The levels in two previously contaminated wells are now below detectable limits (OR 88-2 and OR 88-4);
- * The levels in the worst well have reduced by 55%, but are still above acceptable standards (OR 88-3), and;
- * One well that previously showed no detectable contamination now shows chlorinated solvent contamination above the Safe Drinking Water Act levels (OR 88-5).

Also a shift in the groundwater elevation indicates a change in flow from approximately 27 degrees East of South to nearly 60 degrees West of South.

To further profile the plume Rinchem has contracted for the installation of six additional groundwater monitoring wells. Two will be on the Western third of the site, two on the North or up gradient side and two South or down gradient from contaminated wells. Rinchem will seek permission to sample and analyze two existing wells west off the site.

These six to eight wells will be sampled in early December 1992. Samples will be analyzed by an independent laboratory for volatile organic contaminants at Safe

Drinking Water Act levels. If, after these results are available, the plume cannot be adequately characterized, additional wells will be positioned to answer remaining questions.

Soil Contamination Modeling:

The site is approximately 120 feet by 220 feet with an area of 90 x 100 feet currently occupied by building or concrete slab. The unoccupied area has been gridded in twenty foot increments. Rinchem will perform shallow (14 foot) soil borings in at least twenty-five of the seventy possible grid corners. The initial twenty-five shallow boring locations were selected to maximize the chance of finding contamination based on building layout, prior testing, and known previous usage of the site. They also emphasize the site perimeter.

Shallow borings will be performed with both stainless steel hand auger and split spoon/hollow core auger drilling rig. Borings will be logged for geology and analyzed on-site and off-site. Boring tools will be decontaminated after each sample.

Testing and sample collections will occur at each two foot interval in each shallow boring. Each test/sample will consist of three potential splits:

- a) At each interval, the bore hole air space will be tested with an MSA photo Ionization Detection Meter containing a 10.6 meV lamp. This analysis will be performed by extracting the soil, inserting the PID sample probe (or extender) down the shallow bore hole, turning on the PID and reading the meter until it approaches a steady reading. This PID will be calibrated before each shift and the calibration gas read after each shift. If 5% or more drift from this standard is seen, the frequency of calibration will be increased.
- b) Each interval will be sampled for analysis on a Gas Chromatograph with Photo Ionization Detector and integrator calibrated for nine solvents previously indicated as being of concern on the site. The samples for the GC will be 40 milliliter vials filled 3/4 full and placed immediately on ice. All samples will be analyzed within two weeks of sampling. Analysis will be performed on 25 grams of soil, saturated with 25 ml of distilled water, with no more than 4mm headspace. Gases are extracted, separated in a gas chromatograph and measured in a photo ionization meter. The samples are heated to 30 degrees C, and compared to results of head space gases for standards of chemical constituents of concern. Quality Assurance, and Quality Control procedures are documented. These results will be correlated with c) below.
- c) Duplicate samples will be collected for independent laboratory verification by GC/MS (EPA method 8260). All intervals will be sampled, but no more than five to ten percent of the samples are

expected to be sent for verification analysis. At least one sample will be submitted for verification analysis from each shallow bore hole which shows a positive result from split a or b. The sample from a "positive" bore hole that corresponds to the interval showing highest contamination will be submitted. GC/MS samples will be 4 ounce jars filled and firmly packed to eliminate head space. The samples will be immediately sealed and placed on ice until arrival at the lab. They will be analyzed within two weeks of collection.

Rinchem will also use soil geology data from the well drilling logs and chemical analysis data from soil split spoon samples as background. The background samples will come from areas which appear undisturbed, below the surface with no reason to suspect contamination. Generally, the background samples are outside the areas influenced by Rinchem operations.

Each test/sample will be labeled in accordance with the following example or pattern:

<u>OR 92</u>	<u>A</u>	<u>-4</u>	<u>a</u>
project number	Boring	Interval in feet below surface	split

The bottles will be pre-labeled and a copy of the label for "split a" will be placed in the sampling log with the PID reading recorded on it.

Additional data from the well drilling will include:

Geology, color, unusual occurrences, depth of hole, depth to water, well finishing and casing procedures.

If soil contamination is determined by the field testing with the PID at the 14 foot level, additional sampling in five foot intervals may continue until the contamination level decreases dramatically or until the fifty foot level. Soil borings are not to proceed to groundwater (80 feet) at this stage.

The Data from this initial soil sampling and analysis will be plotted and evaluated. If the project scientist (an independent hydrogeologist) determines more borings would be helpful, they will be performed. Because there was severely stained dirt under what is now building, corings through the concrete floor may be necessary. The building owner has agreed to allow such coring if deemed necessary.

Conclusion:

Cuttings from boring and drilling operations are contained on-site, in 55 gallon metal drums, until analytical results are received. Those from uncontaminated holes will be returned to the ground on-site, while those which show levels of contamination above regulatory standards will be properly treated or disposed of.

Plotted data from soil and groundwater testing will be used in later phases to develop a Feasibility Study and a Remedial Action Plan. The Feasibility Study will consider known options and select a combination from soil removal, passive and active soil venting, sparging, pump and treat, enhance biodegradation and insitu oxidation. Remedial objectives will be set during this phase. Implementation of the Remedial Action Plan will include appropriate groundwater and soil sample analysis to monitor progress toward, and achievement of, the preset objectives.