

STATE OF NEW MEXICO



ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Box 968, Santa Fe, New Mexico 87504-0968
(505) 984-0020

Comments on July 1985
Approved Closure Plan
COPY

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 4, 1985

General Electric Co.
Apparatus and Engineering Services
Environmental Engineering
Attention: Barry York
Building 2 - Room 106
One River Road
Schenectady, New York 12345

60-114-100-100-100-100

Re: Closure Plan -- GE Apparatus Shop, 4420 McLeod Road, NE,
Albuquerque, New Mexico

Dear Mr. York:

The Hazardous Waste Section of the New Mexico Environmental Improvement Division (EID) has completed its review of the Closure Plan submitted for the above referenced facility. This Plan was submitted by the General Electric Co. (GE) and dated July 3, 1985. GE had met with EID in Santa Fe on June 5, 1985 to discuss an earlier version of the Closure Plan; the July 3 Plan contains a number of the revisions discussed at that meeting. In addition to the comments from the June 5 and previous meetings, our review of the July 3 Plan took into consideration comments at a meeting between EID and your consultant (Tom Baca of SEA Engineering) on July 1, 1985.

As provided for by Section 206.C.2.c(4) of the New Mexico Hazardous Waste Regulations (HWMR-2), the EID hereby approves the July 3, 1985 Closure Plan, with modifications, as specified below.

1. HNU Screening of Soil Samples.

Pages 9 and 10 of the Closure Plan indicate that selection of samples for screening will be determined by sampling the headspace in the soil sample jars. This technique has the potential to significantly lower the subsequent soil analysis values. GE is not to sample the headspace of any soil sample jar which

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potentially will be submitted for laboratory analysis. As before stated, EID would prefer that GE analyze samples from 5 foot intervals, regardless of HNU readings. If GE wishes to utilize HNU screening to select additional samples, it should be done by dropping the HNU probe to the bottom of the borehole interval, after the split spoon sample has been taken, or by testing a separate soil sample from the split spoon (not the sample to be taken to the laboratory).

2. Ground-Water Monitoring

As discussed with GE and its representatives in meetings held in late 1984; throughout 1985; meetings with GE's consultants; comments submitted by EID on draft closure plans; and numerous phone calls, no closure plan for this facility will be deemed acceptable unless it includes ground-water monitoring in the Phase I portion of the plan. The fact that liquids were disposed of in the drywell(s) for at least 14 years makes the possibility of ground-water contamination too likely to not install monitoring wells. And, had GE properly notified, ground-water monitoring installation would have been required by November, 1981.

EID, therefore, requires that GE install a minimum of four ground-water monitoring wells, three to be hydraulically downgradient of the hazardous waste unit (dry well or wells) and one to be hydraulically upgradient of the hazardous waste unit. The upgradient well, to be used to define background water quality, shall be located such that water from the well will not be affected by the facility. One downgradient well shall be placed within 50 feet of the dry well(s). The other two wells are to be placed further downgradient in a manner intended to detect both advection and dispersion of any contaminants which may have entered the ground water from the dry well(s).

The wells must be designed and constructed so as to be capable of detecting the types of wastes that went into the dry well(s) (for example, steel or teflon casing, screening at the top of the aquifer, air drilling). The well locations and construction design must be approved by EID prior to beginning drilling.

All the wells are to be sampled and the water analyzed for the following constituents by the indicated analytical technique:

1. Volatile organics
 - a. benzene (EPA Method 8020 or 8240)
 - b. ethylbenzene (EPA Method 8020 or 8240)
 - c. methylene chloride (EPA Method 8010 or 8240)
 - d. methyl ethyl ketone (EPA Method 8015 or 8240)
 - e. tetrachloroethylene (EPA Method 8010 or 8240)
 - f. toluene (EPA Method 8020 or 8240)
 - g. 1,1,1-trichloroethane (EPA Method 8010 or 8240)
 - h. xylene (EPA Method 8020 or 8240)
 - i. GC/MS scan (EPA Method 8240)
2. Semivolatile organics: GS/MS scan (EPA Method 8250)

3. Metals

- a. arsenic (EPA Method 7060 or 7061)
- b. barium (EPA Method 7080 or 7081 or 6010)
- c. cadmium (EPA Method 7030 or 7031 or 6010)
- d. chromium (EPA Method 7090 or 7091 or 6010)
- e. lead (EPA Method 7420 or 7421 or 6010)
- f. mercury (EPA Method 7470)
- g. selenium (EPA Method 7740 or 7741)
- h. silver (EPA Method 7760 or 7761 or 6010).

Water level measurements are to be taken before the wells are pumped. The wells are to be surveyed so that the water level information may be expressed as feet above mean sea level. GE must submit a Sampling and Analysis plan to EID for approval prior to the sampling. EID is to have the option to split samples with GE.

The wells are to be installed and sampled during Phase I of the closure. Well logs, ground-water sample results, and water levels must be submitted with the Phase I written report.

Should the water levels indicate that the wells are not located upgradient and downgradient so as to be able to detect contaminant migration from the dry well(s), then installation of more wells may be required. Should the sample analyses show that wastes from the dry well(s) have contaminated ground water beneath the facility, GE will be required to develop for Phase II a corrective action plan to assess the extent of contamination and to restore the aquifer quality.

3. Post-Closure Plan

The Closure Plan states that if post-closure care is necessary, it will be done in accordance with HMR-2 (sic) Section 206.C. However, in accordance with HMR-2 Section 301.A., any necessary post-closure care will need to be in accordance with HMR-2 Section 206.D. requirements, and will require a post-closure care permit.

4. Chain-of-Custody Form

The example chain-of-custody form in the Closure Plan indicates that samples were sent to two separate labs, so that the form could not have accompanied all samples, and there is no signature for receipt by either lab. The text, however, indicates a more appropriate procedure. Properly, the form should be signed by the field custodian, then sealed inside the package with the samples. Upon arrival, the laboratory should sign the form and indicate whether the outside seal was intact when received.

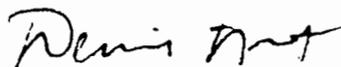
In accordance with the Closure Plan schedule, closure activities will commence within four weeks of receipt of EID's approval of the Closure Plan (this letter), which

would be in the fourth week of October. It is incumbent upon GE to notify EID of the exact date closure activities are commenced.

We appreciate the excellent manner in which most of our comments were addressed in the July 3 Closure Plan and GE's continuing cooperation in progressing toward closure of the dry well(s).

If you should have any questions please feel free to call either Ann Claassen or Jack Ellvinger of the Hazardous Waste Section at (505) 984-0020 ext. 340.

Sincerely,



Denise Fort
Director, EID

DF/JE,AC/mt

cc: Prakesh Dave, EPA Region VI
Richard Mitzelfelt, EID Region I
Duff Westbrook, EID Legal