



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202-2733

February 5, 1990

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Barry R. York
Apparatus Service Department
General Electric Company
1 River Rd., Bldg. 6, 2nd Floor
Schenectady, NY 12345

XIII

Dear Mr. York:

The U.S. Environmental Protection Agency (EPA) has completed its review of the RCRA Facility Investigation (RFI) Workplan and Current Conditions Report which have been revised by General Electric (GE) Company and were resubmitted to the Agency on January 22, 1990. EPA is approving these documents with the contingency that GE modify the Workplan to address the below listed items to EPA's satisfaction. Overall it appears that the majority of EPA and New Mexico Environmental Improvement Division (NMEID) comments have been incorporated into the documents. As I am sure the Workplan will be adhered to, the project should proceed efficiently and quickly. As discussed in the December 14, 1989, meeting between EPA, NMEID, and GE, and confirmed by Mr. Boyd Hamilton of NMEID, the data collection elements put forth in the the RFI workplan should satisfy a significant portion of the data collection requirements for closure.

The contingency items for approval follow:

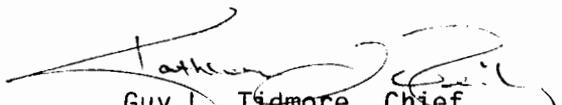
1. Please update Table 7 in the Current Condition Report.
2. Page 3-3 of the Workplan states that the pattern and concentration of acetone and 2-butanone do not match that expected to be associated with natural contaminant migration through a vertical soil section of this thickness. This statement is an opinion and unless substantiated should be stated as such.
3. On page 3-7 (RFI Workplan), it is stated that the piezometer screen length will be determined in accordance with lithology of the materials encountered. The screen length must also be placed appropriately to intercept the water table.
4. Page 5-4 in the RFI Workplan is missing.

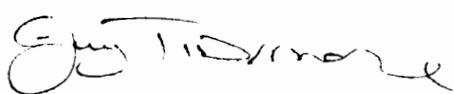
5. On page 9-2, it is stated that potential sources will be removed with implementation of the proposed Interim Measures. As the soil removal is not being done under Interim Measures this is no longer true. Please delete the statement.
6. In Appendix B (Page B-12), it is stated that VOAs will be collected within 3 hours of completion of well purging. VOAs shall be collected as soon as water within the well reaches 90% recovery. Water should not be allowed to cascade down the well screen, as this will cause degassing of volatiles. If well recovery exceeds 3 hours, VOAs shall be collected as soon as enough water is present in the casing to fill the sampler. Volatilization of compounds will significantly reduce VOA concentrations in a 3-hour period and is not acceptable as representative of ground water quality.
7. The most significant problem is that the monitor wells were changed from 4" stainless steel to 2" PVC (APP C-2). As discussed on December 14, 1989, PVC is an acceptable material from a chemical standpoint but its structural integrity at the expected monitoring well depths is suspect. Use of a 2" well rather than a 4" well was not discussed. Please contact me immediately regarding this matter so progress is not delayed.

These items are largely editorial in nature and can be quickly amended. Please submit the revised pages to EPA as soon as possible, but in no more than 30 days from receipt of this letter. Work may proceed before the revisions are submitted with the understanding that approval of the documents is contingent on these changes.

I am quite pleased with the quality of work submitted by GE and our rapid progress. Should you have any questions on the requirements for approval, please contact me or Kathleen O'Reilly at (214) 655-6480.

Sincerely,


Guy L. Tidmore, Chief
Technical Section (6H-CX)
RCRA Enforcement Branch

for 

cc: Jack Ellvinger, NMEID ✓
Jens Deichmann, PRC-ALB
Randall E. Brown EPA