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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 18, 1996

Mr. Gary Miller
Project Coordinator
Technical Section (6EN-HX)
Hazardous Waste Enforcement Branch
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202-2733

RE: **Work Plan For Closure Of Two Dry Wells**
EPA ID NO. NMD047140256

Dear Mr. Miller:

The New Mexico Environment Department (NMED) Hazardous and Radioactive Materials Bureau (HRMB) has reviewed General Electric's "Work Plan For Closure Of Two Dry Wells," dated October 28, 1996. HRMB has the following comments and concerns on this work plan for your consideration:

General Comments:

1. The intent of the General Electric (GE) document entitled "Work Plan For Closure Of Two Dry Wells" dated October 28, 1996, is unclear to HRMB at this time. As directed by the Environmental Protection Agency (EPA), letter dated August 13, 1996, GE has complied with EPA's request with the submittal of this work plan.

Of concern to HRMB, is whether this GE document is a "RCRA closure plan" or a "Draft Interim Measures (IM) Work Plan," as specified in EPA's Consent Decree, Civil Action No. 87-1073-jb, Section VII, B. and C.1. respectively. If this work plan is a closure plan addressing clean closure, the document is deficient, as per 20 NMAC 4.1.600 incorporating 40 CFR, Subpart G - Closure and Post-Closure Care, §§265.110 through 265.120; and as specified in EPA's consent decree, Section VII, A. and B. If this work plan is a Draft Interim Measures Work Plan, the document must comply with EPA's

consent decree, Section VII, C., and all other appropriate sections as specified.

The following specific comments address deficiencies in the work plan that NMED requests be revised.

Specific Comments:

1. Section 3.0, Remediation Level:
The closure plan states that excavations made at each dry well will extend to a maximum depth of 15 feet.

If the intended purpose of this "work plan" is a closure plan for the purpose of achieving clean closure, NMED requires that at the maximum depth of 15 feet, should the results of the field screening or verification sampling and analysis from the excavation bottom exceed the remediation level of 10 ppm, that further excavation be conducted until verification samples that are taken and analyzed for PCB's from the excavation bottom are at concentrations less than 10 ppm.
2. Section 4.1.1, Site Security:
In addition to the site security measures already in place and proposed as stated in this section, and as illustrated in Figure 2; NMED requests that the facility, during partial or final closure, adhere to the New Mexico Hazardous Waste Regulations, 20 NMAC 4.1.600 incorporating 40 CFR §265.14(b)(2)(ii) and §265.14(c).
3. Section 4.3, Verification Sampling and Analysis, ¶ 2:
"... the optional area of excavation will be expanded vertically, with a maximum depth of 15 feet, ..."

Please refer to specific comment number 1.
4. Section 4.3, Verification Sampling and Analysis, ¶ 3:
"Samples will be composited and results evaluated ..."

NMED requests that discreet samples be taken in lieu of composite samples.
5. Section 4.4, Characterization for Treatment/Disposal, ¶ 1:

NMED requests that the chemical analyses planned for the samples taken from the roll-off boxes include totals for semi-volatile organics, SW-846 Method 8270.

6. Section 4.6, Equipment Decontamination, ¶ 1:
"Water generated by decontamination will be captured and used for dust control on the loads of excavated material."

NMED does not approve in the use of decontamination water for the purposes of dust control. The work plan must identify all areas requiring decontamination and describe all steps necessary to decontaminate equipment, structures and soil. The work plan should include:

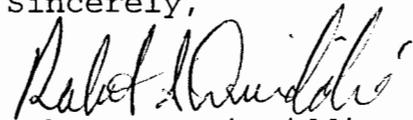
- a list of contaminated equipment, structures and facility area, e.g., tanks, containers, sumps, piping, valves, earth-moving equipment, personnel equipment, etc.
- criteria for evaluating decontamination
- methods for sampling and testing contaminated soils, residues and wastewaters

7. 5.0, Health and Safety, ¶ 2:
"Wash water from decontamination will be used for dust control."

Please refer to specific comment number 6.

If you have any questions regarding this matter, you may contact Phillip Solano of my staff at 505/827-1561.

Sincerely,



Robert S. Dinwiddie, Manager
RCRA Permits Management Program

cc: Benito Garcia, Chief, HRMB
Jerry Bober, Supervisor, RPMP(DOD)
Ronald Crossland, EPA Technical Section (6EN-HX)
GE Red File '96