

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
COMPLIANCE ASSURANCE & ENFORCEMENT DIVISION
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TO: Phillip Solano

FAX #: 505/827-1544

BUSINESS #: _____

PAGES TO FOLLOW: 3

FROM: GARY MILLER (6EN-NX)

BUSINESS #: 214/665-8318

REMARKS:

SENT BY:

DATE:

TIME:

January 21, 1997

Mr. Michael K. O'Donnell
Project Manager
Environment, Health & Safety
General Electric Company
Building 2, Room B-33
One River Road,
Schenectady, New York 12345

DRAFT

Dear Mr. O'Donnell:

The U. S. Environmental Protection Agency (EPA) and the New Mexico Environmental Department (NMED) have completed a review of the Work Plan for Closure of Two Drywells (WP), dated October 29, 1996. The two drywells are located at the former General Electric Company Apparatus Service Center in Albuquerque, New Mexico. The WP was submitted in accordance with the Consent Decree (Civil Action Number 87-1073-jb) between EPA and General Electric Company.

EPA approves this submittal with the modifications detailed in Enclosure 1. These modifications, developed by EPA and NMED, are necessary to comply with the closure and post-closure requirements of 40 CFR § 265, Subpart G, and Section VII of the Consent Decree. EPA expects all of the enclosed modifications to be fully implemented. If you believe that any changes are necessary, other than those directed by EPA's attached modifications, those changes should be discussed with, and approved by, EPA.

If you have any questions concerning this matter, or would like to discuss the attached modifications in detail, please contact me at (214) 665-8318.

Sincerely yours,

DRAFT

Gary Miller
Project Coordinator
Technical Section (6EN-HX)
Hazardous Waste Enforcement Branch

cc: Phillip Solano, NMED
Baird Swanson, NMED

bcc: Nelly Rocha (6EN-L)

DRAFT**Required Modifications
Work Plan for Closure of Two Drywells**

General Electric Company Apparatus Service Center
Albuquerque, New Mexico

1. During closure, GE must comply with the New Mexico Hazardous Waste Regulations 20 NMAC 4.1.600, concerning measures to control access, and sign requirements. These regulations incorporate 40 CFR § 265.14(b)(2)(ii) and § 265.14(c).
2. The area referred to as the "optional area of excavation" shall be remediated as detailed in the Work Plan, in accordance with Section VII of the Consent Decree.
3. Storage of excavated materials in temporary stockpiles, as described in Section 4.2 of the Work Plan, shall not be done unless sampling and analysis are obtained, which prove that the excavated materials are not hazardous. Otherwise, the excavated materials must be stored in the roll-off boxes as described in the Work Plan, in accordance with the requirements of 40 CFR § 262.34, including labeling and limits on accumulation time.
4. Verification samples taken following excavation, which is described in Section 4.3 of the Work Plan, shall be discreet samples, and shall not be composited.
5. Samples obtained from the roll-off boxes for treatment and/or disposal characterization, as described in Section 4.4, shall be also include a total analysis for semi-volatile organic compounds (SW-846, Method 8270).
6. Section 4.6, Equipment Decontamination, proposes to use decontamination waste water for dust control on the loads of excavated material. Decontamination waste water shall not be used for dust control. Decontamination residues and waste waters shall be sampled and tested, using analysis methods described in Section 4.4, "Characterization for Treatment/Disposal", and shall be properly labeled, transported and disposed.
7. GE must conduct ground water monitoring, utilizing the existing ground water monitoring wells, in accordance with 40 CFR § 265 Subpart F, at least until the Final Remedy is selected for the site. The need for further ground water monitoring will be determined based on the Corrective Measures Study (CMS) results and Final Remedy, in accordance with 40 CFR § 265.90(c).

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**Required Modifications
Work Plan for Closure of Two Drywells**

General Electric Company Apparatus Service Center
Albuquerque, New Mexico

(Continued)

8. Upon completion of closure, certification shall be submitted to NMED by both GE, as owner of the Facility, and by an independent Registered Professional Engineer that the drywells have been closed in accordance with the approved, modified closure plan, as required by 40 CFR § 265.115.

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