

HSWA GEAPP G/MJR



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PETER MAGGIORE
SECRETARY



February 27, 2002

Mr. Gary G. Miller
Technical Section (6EN-HX)
Hazardous Waste Enforcement Branch
U.S. EPA Compliance Assurance & Enforcement Division
1445 Ross Avenue
Dallas, TX 75202-2733

**RE: APPARATUS SERVICE SHOP CORRECTIVE MEASURES STUDY REPORT
GENERAL ELECTRIC POWER SYSTEMS
NMD047140256
HWB-GE-02-001**

Dear Mr. Miller:

The New Mexico Environment Department (NMED) has reviewed the Revised Corrective Measures Study Report for the General Electric Power Systems Apparatus Service Shop located on 4420 McLeod Road, Albuquerque, New Mexico. Provided below are NMED's comments to the subject document that was received by NMED on February 15, 2002.

General Comments

- 1 Organization The document NMED received on February 15, 2002 does not seem to be assembled properly. The body of the main text is repeated in the figures section behind the Figure tab. A number of the sections presented in Appendix C are repeated from the main body of the CMS Report. To eliminate repetition and confusion, it is suggested that the elements of Appendix C be integrated into the main body of the CMS Report within the appropriate sections.
- 2 RCRA Compliance It is stated that the appropriate corrective measure has been conceptually agreed upon by the USEPA, NMED, and GEPS. However, the scope of the CMS generally omits compliance with

RCRA. The soil sampling verification program should include RCRA constituents. This information should be used to clarify whether or not any contaminant mass that may remain below the 15-foot depth is (or is not) a threat to groundwater and should be used to present and demonstrate clean closure equivalency. NMED may require further actions if soil contamination below the dry wells is considered to be a threat to groundwater.

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| 3 | Closure Plan Requirement | Because the previously submitted Closure Plan has not been formally approved, it is suggested that this CMS Report be submitted as an amended Closure Plan and have the title "Amended Closure Plan and Revised Corrective Measures Study." |
| 4 | Reporting Requirements | The CMS Report should describe how GEPS will comply with any remaining reporting requirements given in the Consent Decree, including monthly reporting. A contingency plan should be prepared to meet the requirement under Section VII, <i>Work to be Performed</i> . |

Specific Comments

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| 5 | 1.0 Introduction | The statement that the corrective measure implementation "will be focused and streamlined to benefit all parties" is inappropriate. A streamlined corrective measure is being considered because it is congruent with acceptable practice and guidance and it is also appropriate for the site. NMED is primarily interested in the protection of human health and the environment. |
| 6 | 3.1.1 Nature and Extent | At the former drum rack area and at the former waste storage area, previous results indicate that surface soil PCB contamination was measured above the cleanup level of 1 ppm. At soil sample stations HA-19 and HA-48 near the former Drum Rack Area, PCB results range up to 3,300 ug/kg. At soil sample stations HA-30 and HA-40, PCB results range up to 3,700 ug/kg. The CMS Report should present these results and describe how these areas will be addressed during the corrective action program. |
| 7 | 3.1.1 Nature and Extent | The results for both groundwater monitoring events should be summarized in a table. The locations of the groundwater monitoring wells should be presented on one of the report figures. |

Provide a reference that can be used to examine the complete analytical results of the groundwater sampling events.

- 8 3.1.1 Nature and Extent Some of the soil sample locations and data shown on Figure 3 do not agree with previous published results, and some data points are missing. For example, results for station HA-30 is shown as 3.7 ppm in the RFI Report, not ND. Station HA-48 does not appear to be located in the same location that it was in the RFI Report. Other soil sample locations appear to be missing, such as station HA-19. The CMS Report should present a complete and accurate summary of all measured soil sample results used to make any corrective action decisions.
- 9 3.1.2 Potential Receptors If volatile organic contamination below the 15-foot depth is comparable to previous borehole results in the low part-per-billion range, then it is unlikely that a threat to groundwater exists. However, the results of the verification sampling program will determine whether or not contaminant mass below the dry wells represents a threat to groundwater. This section should explain that the corrective measure soil verification results will determine whether or not groundwater is considered to be an environmental receptor.
- 10 4.0 Risk Characterization Without the benefit of soil verification results, the statement that there is no potential for groundwater contamination cannot be made. If verification results show volatile organic contamination higher than previously measured in the boreholes, NMED may require additional actions to protect groundwater at the site.
- 11 4.1 Soil The results of the risk assessment are based on contamination previously measured in the boreholes. Soil verification results obtained during the corrective measure will provide new information that will be used to evaluate risk to the environmental groundwater pathway.
- 12 4.1 Soil It should be clarified that the target risk level of 1E-05 must incorporate a residential risk exposure scenario.
- 13 4.2 Groundwater The groundwater contaminant transport model results are based on previous contamination levels obtained from borehole sample results. As stated in comment 9 above, if soil sample verification

- results obtained during the proposed corrective measure show volatile organic contamination higher than previously measured in the boreholes, NMED may require additional actions to protect groundwater at the site.
- 14 5.1 Corrective Measure Objectives The cleanup goal statement should include RCRA constituents. Without soil sample verification data for RCRA constituents, NMED is unlikely to grant site closure under RCRA.
- 15 5.1 Corrective Measure Objectives As stated above, the statement that groundwater “will not be impacted by the site” is unconfirmed. If soil sample verification obtained during the corrective measure show volatile organic contamination higher than previously measured in the boreholes, NMED may require additional actions to protect groundwater at the site.
- 16 5.1 Corrective Measure Objectives This section states that “fulfilling the corrective measure objectives will require remediation of the areas identified on Figure 4.” However, Figure 4 does not clearly illustrate what areas will be remediated. The figure should clearly indicate which areas will be excavated during the corrective measure. Also, the CMS should explain how the lateral extent and depth of each excavated area will be determined.
- 17 5.1 Corrective Measure Objectives This section states that the corrective measure will obtain a clean/NFA RCRA corrective action closure to the satisfaction of USEPA and NMED, and that clean closure equivalency will be demonstrated in the Corrective Measures Certification Report. However, it is not clear what analysis will be conducted on samples collected at the limits of excavation at the remediated areas that could be used to demonstrate clean closure equivalency. A soil verification sampling and analysis program should be presented that includes analysis for Appendix IX constituents (40 CFR 264) such as volatile organic compounds using EPA method 8260 or another approved method.
- 18 5.3.1 Alternative Description The description of the alternative should include a summary of any permits or certificates that may be required by the City of Albuquerque and Bernalillo County for the proposed corrective measure activities.

- 19 5.3.1 Alternative Description This section should state that the backfill data will be presented in the Corrective Measures Certification Report.
- 20 5.3.1 Alternative Description Until waste sample results are available, it is possible that hazardous waste may be accumulated on-site without a RCRA permit or without having interim status. The proposed waste management operations description should state that soils will be managed as hazardous until it is confirmed that these wastes are nonhazardous. Wastes may not be managed at the site for more than 90 days unless the wastes are determined to be non-hazardous or non-TSCA before the 90-day storage limit is up. Soil containers should be labeled with a sign "Hazardous Waste Pending Analysis" and dated, so that storage periods may be tracked properly. The frequency of analysis that will be used to confirm that soil piles are nonhazardous should be proposed. Describe the sampling program that will be used to determine that decontamination wastes are not hazardous.
- 21 5.3.1 Alternative Description Because the site is in a populated area, it is undesirable to store excavated soil in piles on the land surface, because of potential exposure from dust or other pathways. Remediation soils should be stored in roll-off containers.
- 22 5.3.1 Alternative Description Excavation procedures should include a statement that OSHA guidelines will be complied with (29 CFR 1910 and 1926).
- 23 5.3.1 Alternative Description Currently, the dry wells are not visible on the land surface. This section should describe how the dry wells would be located during the corrective measure program.
- 24 5.3.2.4 Health and Safety As described in Section D of Attachment A of the Consent Decree, the CMS should contain an adequate health and safety plan that specifies what dust control practices will be implemented, what instruments will be used to measure organic vapors, what respiratory protection practices will be implemented, and what level of personal protective equipment will be required at the site. Describe the decontamination procedures that will be used to control and manage decontamination liquids. Also, the health and safety plan should include a statement that warning signs will be posted during corrective measure activities as required by the Consent Decree.

- 25 Figure 1 The site map does not adequately illustrate the location of the site.
- 26 Figure 2 The site layout should illustrate the location of the groundwater monitoring wells.
- 27 Appendix C A number of the sections presented in this Appendix are repeated from the main body of the CMS Report. To eliminate repetition and confusion, it is suggested that the elements of Appendix C be integrated into the main body of the CMS Report within the appropriate sections.
- 28 Appendix C
1.0 Background It is stated that a "more detailed design document will be prepared following acceptance of this by USEPA and New Mexico Environment Department (NMED) scope." Attachment A of the Consent Decree indicates that a Draft and a Final Corrective Measures Study Report will be submitted within 30 days after the receipt of EPA comments on the draft. Therefore, the "more detailed design document" referred to should be identified as the Final Corrective Measures Study Report.
- 29 Appendix C
2.2 Site
Characterization This section lacks any useful information regarding the results of past soil boring and soil sampling characterization programs. Perhaps it should be re-titled "location and description of the dry wells."
- 30 Appendix C
3.0 Corrective
Measure Objectives This is the same section presented earlier in the document. See comments 14 through 17, above.
- 31 Appendix C
4.0 Soil/Dry Well
Corrective Action This information should have been presented in Section 5.3.1, Alternative Description. To eliminate confusion and repetition, the description of the corrective measure activities should be presented in one section of the CMS Report.
- 32 Appendix C
4.1 Site Preparation Currently, the dry wells are not visible on the land surface. This section should describe how the dry wells will be located during the corrective measure program. See comment 23. Also, site preparation activities should include a description of any required City of Albuquerque or Bernalillo County permits or registrations. See comment 18.

Mr. Gary G. Miller
February 27, 2002
Page 7

- 33 Appendix C
4.4 Health and
Safety This section states that a health and safety plan will be prepared. However, an adequate description of health and safety procedures should be presented in the main body of the CMS Report. See comment 24.
- 34 Appendix C
4.5 Excavation Area
Layout It is stated that excavation areas and associated depths are presented in Figure 3. However, Figure 3 only illustrates areas previously shown to be contaminated. It does not clearly indicate what specific areas will be excavated. See comment 16. The Figure should clearly indicate where excavations will occur during the corrective measure activities.
- 35 Appendix C
4.5 Excavation Area
Layout To help avoid the possibility of volatilization, verification soil samples should be collected from the bottom of the excavation under safe conditions, not the excavation bucket.
- 36 Appendix C
4.5 Excavation Area
Layout The verification soil sampling program presented here excludes any sampling for RCRA constituents. The soil verification sampling and analysis program should include analysis for Appendix IX constituents (40 CFR 264) such as volatile organic compounds using EPA method 8260 or another approved method. See comments 9, 14, and 17.
- 37 Appendix C
4.5 Waste
Characterization The waste characterization program should include a proposed frequency of analysis. See comment 20.

Please incorporate these comments into the final set of comments that will be presented to GE. If you have questions, please call me at (505) 845-5932.

Sincerely,



Richard Kilbury
Project Leader

Mr. Gary G. Miller
February 27, 2002
Page 8

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cc: J. Bearzi, NMED HWB
W. Moats, NMED HWB
~~File: GE, 2002~~