

GE APP 2002



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PETER MAGGIORE
SECRETARY

May 28, 2002

Mr. Edward Jamison
EHS Project Manager - Remediation
GE Power Systems
1 River Road, Building 43-237
Schenectady, NY 12345

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

Dear Mr. Jamison:

The New Mexico Environment Department (NMED) has reviewed the Revised Corrective Measures Study (CMS) Report for the General Electric Power Systems (GEPS) Apparatus Service Shop located on 4420 McLeod Road, Albuquerque, New Mexico. NMED's draft comments were provided to EPA and GE on February 27, 2002. Draft comments were discussed and resolved on April 12, 2002. Provided below are NMED's final comments to the subject document that was received by NMED on February 15, 2002.

General Comments

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| 1 | Organization | A number of the sections presented in Appendix C are repeated from the main body of the CMS Report. To eliminate repetition and confusion, the elements of Appendix C should be integrated into the main body of the CMS Report within the appropriate sections. |
| 2 | Closure Plan Requirement | Because the previously submitted Closure Plan has not been formally approved, the CMS Report should be submitted as an amended Closure Plan and have the title "Amended Closure Plan |

and Revised Corrective Measures Study."

- 3 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 in accordance with 40 CFR Part 265, Subpart D.

Specific Comments

- 5 1.0 Introduction, Section 1, page 1. The statement that the corrective measure implementation "will be focused and streamlined to benefit all parties" is inappropriate by itself. A streamlined corrective measure is being considered because it is protective of human health and the environment, it is congruent with acceptable practice and guidance, and it is also appropriate for the site. This additional discussion should be added to the CMS Report.
- 6 3.1.1 Nature and Extent, page 7. The CMS Report states that the vertical extent of PCBs reached 97 feet bgs. Figure 3 also lists Boring B-1 with PCBs to 97 feet. The available sampling data for Boring B-1 shows a much shallower vertical extent for PCBs, about 30 feet bgs. Please correct this, or provide a reference for the B-1 PCB sampling results shown in the CMS Report.
- 7 3.1.1 Nature and Extent, page 7. The CMS Report states that "sampling did not identify evidence of contaminant sources or releases in the former waste storage or former drum rack areas." 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 levels range up to 3,300 ug/kg. At soil sample stations HA-30 and HA-40, PCB concentrations range up to 3,700 ug/kg. The CMS Report should remove the statement quoted above, present the previous results, and describe how these areas will be addressed during the corrective action program.
- 8 3.1.1 Nature and Extent, page 7. The groundwater sampling discussion should include the results for both groundwater monitoring events summarized in a table. Also, the locations of the groundwater monitoring wells should be presented on one of the report figures. A reference should be

provided that can be used to examine the complete analytical results of the groundwater sampling events.

- 9 3.1.2 Potential Receptors, page 8. The groundwater pathway should be discussed in this section. If volatile and semi-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 ground water. This section should explain that the corrective measure soil verification results will determine whether or not groundwater is considered to be an receptor.
- 10 4.0 Risk Characterization, page 9. The CMS Report states that the attached risk assessment does not include PCBs, but a risk assessment is required for PCBs below a depth of 15' to meet the TSCA requirements (i.e., either 1 ppm, or a risk assessment based cleanup). On p. 9, there is a discussion on the lack of an exposure pathway below a depth of 15'. This discussion of PCBs should be developed in the risk assessment (Appendix A, Section 3, page 9).
- 11 4.1 Soil, page 10. The CMS Report states that residential use scenario is used from 0 - 5' bgs, and a construction worker scenario from 5' - 15' bgs. The Risk Assessment addresses the top 5', but not the 5' - 15' interval in terms of construction worker exposures to the contaminated soil. The Risk Assessment should be revised to include this scenario for the 5' - 15' depth range.
- 12 4.1 Soil, page 10. The CMS Report states that "there is no threat to site ground water." Without the benefit of soil verification results, the statement that there is no potential for groundwater contamination cannot be made with any confidence. If verification results show volatile or semi-volatile organic contamination higher than previously measured in the boreholes, additional actions to protect groundwater at the site may be required. The statement should be revised to the effect that previous sampling and assessment suggests no groundwater threat, but verification samples will be taken from the bottom of the dry well excavations to confirm this. If verification sampling results show volatile or semi-volatile organic contamination higher than previously measured at the

facility, then a revision of the risk assessment, and assessment of the migration potential, may be required to protect groundwater at the facility.

- 13 4.1 Soil, page 11. It should be clarified that the target risk level of 1E-05 must incorporate a residential risk exposure scenario.
- 14 4.2 Groundwater, page 11. The groundwater contaminant transport model results are based on previous contamination levels obtained from borehole sample results. If soil sample verification results obtained during the proposed corrective measure show volatile organic contamination higher than previously measured in the boreholes, additional actions to protect groundwater at the site may be required. The CMS Report should be revised to recognize this contingency.
- 15 5.1 Corrective Measure Objectives, page 14. 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.
- 16 5.3.1 Alternative Description, page 16. 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.
- 17 5.3.1 Alternative Description, page 17. Post excavation samples from the bottom of the two drywells should include samples for VOCs and SVOCs in addition to PCB samples.
- 18 5.3.1 Alternative Description, page 17. This section should state that the backfill data will be presented in the Corrective Measures Implementation and Closure Certification Report.
- 19 5.3.1 Alternative Description, page 17. 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

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non-hazardous. 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 "Remediation Waste Pending Analysis" and dated, so that storage periods may be tracked properly. The CMS Report should describe the sampling program and frequency of analysis that will be used to confirm that soil piles are non-hazardous.

- 20 5.3.1 Alternative Description, page 17. 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 covered roll-off containers.
- 21 5.3.1 Alternative Description, page 17. Excavation and confirmatory sampling procedures should include a statement that OSHA guidelines will be complied with (29 CFR 1910 and 1926).
- 22 5.3.1 Alternative Description, page 17. 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.
- 23 5.3.2.4 Health and Safety, page 18. In accordance with Attachment A of the Consent Decree, the CMS Report should contain an adequate health and safety plan. It should specify 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. The CMS should 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.
- 24 Figure 1. The site location map should be revised to adequately illustrate the location of the site.
- 25 Figure 2. As mentioned previously, the site layout map should be revised to illustrate the location of the groundwater monitoring wells.

- 26 Figure 3. 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, the result for station HA-30 is shown as 3.7 ppm in the RFI Report, not ND as in Figure 3. Station HA-48 does not appear to be located in the same location that it was in the RFI Report. Further, the locations for samples HA-16 and HA-19 are switched. The CMS Report should present a complete and accurate summary of all soil sample results used to make any corrective action decisions.
- 27 Figure 4. The figure only illustrates areas previously shown to be contaminated, and does not show the areas to be excavated. Figure 4 should be revised to show the planned excavation area and depths necessary to meet the PCB cleanup level of 1 mg/kg.
- 28 Appendix A, page 6. The risk assessment does not address soil contamination between 5' and 15' bgs as is stated in the body of the CMS. The risk assessment should be revised to include this.
- 29 Appendix A, page 6. The risk assessment statement that "no constituents ... and are carried forward" is somewhat unclear; it should be revised to state that "none are carried forward".
- 30 Appendix A, Section 2.2. The risk assessment should clearly identify which chemicals and pathways will be excluded from the risk assessment as a result of the screening. The pathway(s) to be carried forward in the risk assessment screening should be clearly identified. Justification for removing any other pathway should be discussed in this section. This could be better explained by referencing Table 2.3 and identifying those chemicals of concern which would be carried forward in the risk assessment. The pathways associated with the COPCs should also be fully discussed. In addition, Table 3.1, which provides the NMED SSL equations, should be attached to this section and discussed here, since it is the basis for the screening levels used to screen the COPCs.
- 31 Appendix A, Table 2.1. The table does not list all hazardous constituents found at the facility, and does not list any metals. The table should be revised to include all hazardous constituents.

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- 32 Appendix A, Table 2.3. The table should indicate that the screening levels are 1/10 of the NMED Residential SSL.
- 33 Appendix A, Table 5.1. Column titles should be added to this table.
- 34 Appendix A, page 20. A statement should be added to this section to clarify that the cleanup level of 1 ppm will be based on TSCA to a depth of 15'.
- 35 Appendix C, page 1. The CMS Report states that a "more detailed design document will be prepared following acceptance of this scope by USEPA and New Mexico Environment Department (NMED)," and "the scope outlined in this document will be utilized in the preparation of contract documents for the site corrective action." Since this CMS Report will be used for preparation of contract documents, it should have sufficient detail to insure that the contract specifications are adequate to meet the requirements of the Consent Decree, and should include any more detailed design specifications. The next step, following EPA/NMED review of this draft CMS Report, is the Final CMS Report according to the Consent Decree.
- 36 Appendix C, page 8. Confirmatory samples for VOCs (Method 8260) and SVOCs (Method 8270) should be collected from the bottom of the drywells to insure that the remaining concentrations will be protective of ground water (i.e., consistent with the values used in the leachate model). This information should be used to clarify whether or not any contaminant mass that may remain below the 15-foot depth is a threat to groundwater and should be used to present and demonstrate clean closure equivalency. Further actions may be required if soil contamination below the dry wells is considered to be a threat to groundwater.
- 37 Appendix C, page 8. The verification sampling and analysis program should include a discussion of the number and location of verification samples. The PCB verification sampling plan must comply with TSCA requirements.
- 38 Appendix C, page 9. The provisions for quality control sampling do not include rinsate, field blanks, or matrix spike/matrix spike duplicate (MS/MSD) samples. The Report should include provisions for collection of

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field duplicates (one in ten), rinsate samples (one prior to sampling and after each decon event), field blanks (one per day), and MS/MSD (one in twenty).

- 39 Appendix C, page 10. The current method for VOC analysis is SW-846 Method 8260, which replaces Method 8240. The method for metals is 6010. The CMS Report should be revised to show these methods.
- 40 Appendix C, page 10. The CMS Report does not describe how the excavated areas will be secured while waiting on the confirmatory sample results. The CMS Report should include this information.

During our comment review meeting on April 12, 2002, GE indicated that these comments would be successfully addressed in the Final CMS Report. The Final CMS Report should be submitted within 60 days of the receipt of this letter. Additionally, the New Mexico Hazardous Waste Management Fee Regulations 20.4.2 NMAC require assessment of fees. NMED will issue an invoice to you under a separate letter when the Final CMS Report is received and deemed administratively complete. Payment is due within sixty (60) calendar days from the date that you receive the invoice. Should you need to request an extension of the sixty-day period the request must be received by the NMED a minimum of fourteen (14) calendar days prior to the end of the sixty-day period. Should you disagree with the fee assessed you may file an Administrative Appeal under the provisions of 20.4.2.302.1 NMAC. If you have questions regarding the CMS Report comments or planned schedule, please call me at (505) 845-5932.

Sincerely,



Richard Kilbury
Project Leader

RKK:rk

cc: J. Bearzi, NMED HWB
J. Kieling, NMED HWB
W. Moats, NMED HWB
G. Miller (Gary G. Miller), EPA Region VI Technical Section (6EN-HX)
File: GE, 2002