

**URS**

GEAPP 2003



December 30, 2003

Mr. Robert N. Wilkinson  
Environmental Scientist  
Hazardous Waste Enforcement Branch  
United States Environmental Protection Agency  
1445 Ross Avenue  
Dallas, Texas 75202

**SUBJECT:** Monthly Progress Report – December 2003  
General Electric Consent Decree, Civil Action No. 87-1073-jb

Dear Mr. Wilkinson:

On behalf of GE Power Systems (GE), URS Corporation (URS) hereby submits this Monthly Status report for the above-referenced facility. In July 2001, GE, USEPA and NMED entered into discussions following a period of reduced activity regarding the site. As a result of these discussions URS, on behalf of GE, has since prepared and submitted a revised document entitled *Revised Closure Plan, Final Corrective Measure Study Report, Preliminary Corrective Measure Implementation Work Plan (Work Plan)* for the Former Apparatus Service Center, Albuquerque, New Mexico on August 16, 2002. This document was prepared at the direction of the USEPA and NMED to replace previously prepared documents that had not been acted upon by the agencies.

On October 21, 2002, GE received draft/preliminary response comments from the USEPA following USEPA review of the *Work Plan*. On November 6, 2002, GE received a preliminary copy of NMED comments regarding the August 16, 2002 submittal. GE, URS, and the USEPA discussed the draft comments during telephone calls on several occasions in November and December of 2002 in order to clarify and better understand some of the comments. On February 19, 2003, GE received USEPA's and NMED's final comments on the *Work Plan* and began incorporation of the comments into the *Work Plan*. The final comments were contained in a letter, dated January 10, 2003 that GE did not receive. USEPA faxed a copy of the letter to GE on February 19, 2003 so that GE could address the comments. On March 20, 2003 GE submitted responses to USEPA's and NMED's comments on the *Work Plan*. On May 20, 2003, GE submitted Final Revisions to the *Work Plan*, which addressed USEPA's and NMED's comments on the March 20, 2003 submittal, which were discussed during a telephone conference on May 7, 2003. On August 11, 2003, GE received a letter, dated August 5, 2003, from USEPA that indicated the May 20, 2003 Final Revisions to the *Work Plan* met the USEPA's and NMED's requirements in USEPA's conditional approval letter, dated January 10, 2003. The August 5, 2003 letter also stated that NMED would provide their response in a separate letter.

The recent activities that have transpired since the preceding monthly progress report are:

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GE-Albuquerque/URS Corporation  
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- On December 9, 2003, GE received a hard copy of the *Final Decision and Response to Comments* (FDRC) document from USEPA. Upon review of the FDRC document, GE noted discrepancies between the FDRC document and previous correspondence from USEPA. On GE's behalf, URS contacted USEPA and NMED to arrange a telephone conference to attempt to resolve the discrepancies.
- On December 22, 2003, representatives of GE (Mr. Ed Jamison) and URS (Mr. Don Porterfield) participated in a telephone conference with representatives of USEPA (Mr. Robert Wilkinson and Ms. Rita Ware) and NMED (Mr. Will Moats). The discussion topics, which are presented below in italics, that were the focus of the conference call and the resolutions that were agreed to by GE, USEPA, and NMED are:
  1. *The FDRC document indicates that the pre-implementation investigation is to be completed within 75 days of GE's receipt of the FDRC. However, an August 5, 2003 letter from EPA, which approved the Work Plan, indicated that NMED would provide their approval of the Work Plan separately. Thus, it is not clear to GE that both EPA and NMED have approved the Work Plan.* Mr. Wilkinson confirmed that USEPA has approved the *Work Plan*. Mr. Moats indicated that NMED has not yet provided official approval of the *Work Plan* to GE, but expects to do so shortly. URS and GE await receipt of the approval from NMED.
  2. *The FDRC document indicates that GE will submit final design documents to EPA and NMED for their approval. However, the requirement for submittal of final design documents was omitted from the most recent submission of the Work Plan at the request of EPA and NMED. Both USEPA and NMED agreed that submission of the final design documents was not necessary after completion of the pre-implementation investigation. Furthermore, all parties agreed that documentation of the waiver of the final design submittal in this progress report would be sufficient for the administrative record.*
  3. *What is the status of NMED's review of the project file and when does NMED expect to issue approval letter?* Mr. Moats indicated that NMED has reviewed the project file and expects to issue an approval letter shortly.
- Based on discussions with the NMED and USEPA, GE awaits receipt of formal approval correspondence from the NMED that the Work Plan and proposed corrective action are approved for implementation and that successful implementation will facilitate RCRA closure. GE and URS will provide an updated implementation schedule to USEPA and NMED following receipt of NMED's approval to proceed. The updated schedule will provide dates for milestone events during implementation of the project. Furthermore, GE and URS will use the monthly progress reports to keep the project team members abreast of the project schedule and provide notification if delays are encountered or schedule changes are required.

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URS will continue to submit monthly status reports to the USEPA and NMED for this project. Please contact either Edward F. Jamison, P.G., of GE at (518) 385-7979 or myself at (518) 688-0015 if you have any questions or concerns regarding this information.

Very truly yours,

URS Corporation



Don Porterfield, P.E.  
Project Director

cc: Edward F. Jamison, GE – Schenectady, New York  
Rita Ware – USEPA  
John Kieling – NM Environment Department ✓  
Will Moats – NM Environment Department