



GEAPP 2004

February 2, 2004

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 – January 2004
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.

On December 9, 2003, GE received a hard copy of the *Final Decision and Response to Comments* (FDR) document from USEPA. Upon review of the FDR document, GE noted discrepancies between the FDR 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). During the telephone conference, Mr. Wilkinson confirmed that USEPA had approved the *Work Plan*, while Mr. Moats indicated that NMED has not yet provided official approval of the *Work Plan* to GE, but expected to do so shortly. During the telephone conference it was agreed by both USEPA and NMED 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.

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

- On January 2, 2004, GE received a letter from NMED that approved the Final Revisions to the *Work Plan*. Thus, in accordance with the current schedule in the Final Revisions to the *Work Plan*, the pre-implementation investigation is to be completed by March 18, 2004, which is 75 days after GE's receipt of NMED's approval letter. A figure showing the project schedule based on the January 2, 2004 approval date is attached. Per prior communications, GE understands that the schedule can be amended if needed by notifying the USEPA and NMED in the event of any delays, etc., during completion of the effort.
- On January 21, 2004, URS notified USEPA and NMED, via email, that sample collection activities would begin between January 28 and February 2, 2004.
- On January 28, 2004, the proposed soil boring locations depicted on Figure 8 of the *Work Plan* were staked, labelled, and flagged by a URS Survey crew. While performing this activity, the URS survey crew established horizontal and vertical survey control points at the site that are tied to the City of Albuquerque control monuments. Each of the soil borings will subsequently be assigned a North and East coordinate based on the proposed boring locations.
- On January 28, 2004, New Mexico One Call System, Inc. was contacted to mark out the location of buried public utilities at the site. In conjunction with this task, URS contracted the services of a private utility locating service, TBE Group, Inc. of Albuquerque, New Mexico, to aid in identifying underground utilities in the area of the planned soil investigation and site remediation (soil excavation). The work performed by TBE Group, which consisted of an underground utility scan, was completed on January 28, 2004.

- On January 28, 2004, URS initiated site preparation activities for the collection of indoor air quality samples. As previously agreed to by both USEPA and NMED, the site preparation activities consisted of opening the doors and windows in the building for a period of at least four hours. The doors and windows were then closed, and the air quality in the building was allowed to equilibrate for a minimum period of 24 hours prior to the start of sampling. The indoor air quality samples were collected by URS during the afternoon of January 29, 2004, and submitted to Severn Trent Laboratory (STL) of Austin, Texas for the analysis of tetrachloroethene and trichloroethene by EPA Method TO-15.
- The advancement of 47 geoprobe soil borings and collection of an estimated 129 subsurface soil samples at the site is scheduled to begin on February 2, 2004. URS has retained the services of Enviro-Drill, Inc. of Albuquerque, New Mexico to perform the geoprobe borings. The drilling program is expected to take six to eight days to complete.

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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 the undersigned at (518) 688-0015 if you have any questions or concerns regarding this information.

Very truly yours,

URS CORPORATION



Stephen B. Le Fevre, P.G. C.P.G.
Senior Geologist
Senior Project Manager



Don Porterfield, P.E.
Project Director

cc: Edward F. Jamison, GE – Schenectady, New York
Rita Ware – USEPA
[REDACTED] NM Environment Department
Will Moats – NM Environment Department
Clay Kilmer, URS - Albuquerque

Task Name	04	Jan-05	Feb-05	Mar-05	Apr-05	May-05
GE Receipt of EPA and NMED Approve Final CMS Documents						
Conduct Pre-Implementation Investigation						
Prepare Final Design and Contract Documents						
Solicit Bids						
Receive Bids						
Evaluate Bids						
Contractor Mobilization						
Implement Corrective Measure (mobilization through disposal), meet TSCA Part 40 CFR 761.61 and NM Hazardous Waste Regulations (20.4 NMAC) (Note: see implementation schedule for details)						
Prepare Draft Corrective Measure Certification/Site Closure Document (Corrective Measures Implementation Report and a Clean Closure Equivalency Demonstration, OSWER Direction 9476.00-18 and 40 CFR 270.1(20.4.1.900 NMAC))						
Submit Draft Corrective Measure Certification/Site Closure Document			★			
EPA and NMED Review of Draft Corrective Measure Certification/Site Closure Document						
Receive Comments on Draft Corrective Measure Certification/Site Closure Document					★	
Decommission Groundwater Monitoring Wells						
Prepare Well Decommissioning Report						
Submit Well Decommissioning Report to NMED						★
Address Comments on Corrective Measure Certification/Site Closure Report						
Submit Final Corrective Measure Certification/site Closure Document (Receive certification per 40 CFR 265.115)						★
EPA Provides Letter Stating Order Has Been Complied With						★

Note: If the completion date of a task fell on a weekend the completion date was