



Thomas Antonoff
EHS Project Manager – Remediation

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14 June 2006

Mr. Brian Salem
Environmental Specialist
New Mexico Environment Department
Hazardous Waste Bureau
DOE Oversight Program
P.O. Box 5400 / MS 1396
Albuquerque, NM 87185

**RE: Former Apparatus Inspection and Repair Service Center
4420 McLeod Road NE – Albuquerque, New Mexico
General Electric Consent Decree, Civil Action No. 87-1073-Jb**

Dear Mr. Salem:

Pursuant to our recent discussion concerning the above referenced site, I would like to take this opportunity to thank you for your prompt review and commentary on our *Draft - Corrective Measure Implementation/Construction Certification Report (CMI/CCR)* dated 14 April 2006. Based on our conversation I understand the New Mexico Environment Department (NMED) has no comments on the report. Subject to review and input from the USEPA, we await receipt of NMED and USEPA correspondence on your review and acceptance of the work conducted to fulfill RCRA Corrective Action requirements at the subject site. During our conversation on June 13, 2006, you also indicated the NMED may propose collecting additional confirmatory groundwater samples from the existing on-site monitoring wells prior to GE's approved abandonment of the wells. We respectfully request your permission to abandon the wells without performing this additional sampling event, based on the rationale provided below.

The 2003 EPA Statement of Basis confirms that groundwater has been assessed and does not represent a concern. Groundwater, present at depths surpassing 270 feet below grade, was assessed at the site during the extensive history of site characterization, which included risk assessments to determine the potential for ground-water impact at the site. These risk assessments were performed over a 12 year period between 1990 and 2002.

Summary descriptions and results of the risk assessments were incorporated into the *Final Revised Closure Plan, Final Corrective Measure Study Report, and Preliminary Corrective Measure Implementation Work Plan (CMS/WP)* dated 20 May 2003. The CMS/WP was approved by the NMED and EPA on January 20, 2004. Specifically, the sections of importance from the CMS/WP with regard to abandoning the wells are 4.0 Risk Characterization, 4.2 Groundwater (Risk Characterization), 8.5.1 Decommission of Groundwater Monitoring Wells, Appendix A, and Appendix B.

The CMS/WP Sections 4.0 and 4.2 state that the Revised Risk Assessment *"was performed based on an uncontrolled, residential future land use scenario assumption to satisfy January 2001 changes in New Mexico law"*, and that *"the results of the RFI and subsequent investigations indicated that the groundwater at the site has not been affected by the former site operations or presence of compounds of potential concern at this site."*

As part of the previously submitted 1992 CMS effort, Daniel B. Stephens and Associates, Inc. (Stephens) of Albuquerque, New Mexico completed a conservative contaminant transport model for the site. The results of the conservative modeling indicated that *"the concentrations of chemical constituents present at the site would not surpass drinking water standards at the point of regulatory compliance, which is the GE property boundary, at any point in the future regardless of site remedial activities."*

Appendices A and B of the CMS/WP consist of the Revised Human Health Risk Assessment and Daniel B. Stephens & Associates, Inc. - *Contaminant Modeling in the Vadose and Saturated Zones*, respectively.

Section 8.5.1 of the CMS/WP which was reviewed and approved by the NMED and USEPA titled Decommission of Groundwater Monitoring Wells states that *"No threat to groundwater is anticipated. Therefore, there is no need to monitor groundwater quality in the future. After the corrective measure is implemented, the post excavation sampling results will be discussed with USEPA and NMED. If post excavation sampling results verify that soil remaining at the site does not contain significantly greater concentrations of constituents than were identified during the RFI, the groundwater monitoring wells will be properly decommissioned after USEPA and NMED concur."*

Based on a review of soil-sample analyses results from post-excavation verification presented in the Draft CMI/CCR and RFI/supplemental investigations, the remaining soil at the site does not contain greater concentrations of constituents than were identified during the RFI. The CMI/CCR results are discussed in the Draft CMI/CCR Section 3.2.4.3 Dry Wells 2 and 3 Area Sampling and Analysis Results and are summarized on Table 4.

GE appreciates this opportunity to discuss the project with you. Pursuant to the Figure 13 - Milestone Project Tracking and Status Schedule presented in the CMS/WP, GE is required to decommission the groundwater monitoring wells within 15 days of receiving comments on the Draft CMI/CCR. However, we request concurrence with the NMED and USEPA prior to decommissioning these wells.

Please feel free to contact me if you have any questions or concerns regarding the project. I can be reached at (518)-385-9931.

Sincerely,
GE Energy

Thomas Antonoff
Project Manager – Remediation
Environment Health & Safety

cc: Rita Ware, EPA