



August 31, 2006

AMEC Project No. 3-4915-0021

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

RE: **MONITORING WELL PLUGGING AND ABANDONMENT WORKPLAN
Former GE Albuquerque Apparatus Inspection & Repair Service Center
4420 McLeod Road, North East, Albuquerque, New Mexico
General Electric Consent Decree, Civil Action No. 87-1073-jb**

Dear Mr. Salem:

On behalf of General Electric Energy, Inc. (GE), AMEC Earth & Environmental (AMEC) is pleased to present this workplan for decommissioning the remaining four groundwater monitor wells at the Former GE Apparatus Service Center located at 4420 McLeod Road on Albuquerque, New Mexico.

BACKGROUND:

The Former GE Apparatus Service Center is located at 4420 McLeod Road, NE, Albuquerque, New Mexico, on an approximate two-acre property in a light industrial park. The site is approximately four miles northeast of downtown Albuquerque and approximately 4.5 miles east of the Rio Grande River.

The Former GE Apparatus Service Center was built in 1969 for the repair of industrial equipment. The equipment repair was primarily electrical motors, but also included transformers.

The project has an extensive history of site characterization, including the installation and sampling of four groundwater monitoring wells. Results from groundwater samples from these wells were non-detect for contaminants of concern. Additionally, risk assessments, which showed that there was no potential for ground-water impact at the site, were performed between 1990 and 2002. Summary descriptions and results of the groundwater sampling and 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.

AMEC Earth & Environmental, Inc.
8519 Jefferson NE
Albuquerque, NM 87113
Tel (505) 821-1801
Fax (505) 821-7371

www.amec.com



The CMS/WP was approved by the NMED and EPA on January 20, 2004. Between September 2005 and February 2006, Corrective measures at the site were implemented to the satisfaction of the NMED and USEPA as stated in response letters dated August 2 and August 18, 2006 respectively. NMED grants acceptance of the Corrective Measures Implementation/ Construction Completion Report (CMI/CCR) and the CMS/WP schedule pursuant to the abandonment of the on-site monitoring wells.

The CMS/WP Section 8.5.1 Decommission Groundwater Monitoring Wells states that *"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. Monitoring wells will be decommissioned in accordance with NMED Monitoring Well Construction and Abandonment Guidelines."*

In order to meet these NMED monitoring well plugging and abandonment guidelines, AMEC proposes to perform the following scope of services on behalf of GE:

- Task 1 - Plugging and Abandonment of Monitoring Wells (4) in accordance with NMED guidelines.
- Task 2 - Monitoring Wells Plugging and Abandonment Reporting.

These tasks are described below in detail.

Task 1 – Plugging and Abandonment of Monitoring Wells:

This task involves plugging and abandoning four groundwater monitoring wells. Each well will be plugged in accordance with NMED regulations using cement grout with bentonite powder added for expansion purposes. NMED well abandonment regulations state:

The appropriate methodology for abandoning boreholes and decommissioning ground-water monitoring wells is described in detail in the American Society for Testing and Materials (ASTM) Guidance D 5299-92 and in the State Engineer Office regulations. The practices described in these references are to be followed, with the following modifications when appropriate.

In order to achieve an effective seal, the monitoring wells should be free of debris and foreign matter that may restrict the adhesion of plugging materials to the well wall. The well is to be sealed from total depth to the surface with a bentonite/cement grout (6% to 8% bentonite powder). The grout should be emplaced in such a manner so as to ensure that it is present throughout the length of the well, without bridges or channeling. The depth to groundwater at the site ranges from approximately 250 feet below ground surface to approximately 260 feet below ground surface. Accordingly, abandonment procedures will be conducted as follows:

- 1) Wells will be grouted with a bentonite/cement grout (6% to 8% bentonite powder) to within 3 feet of ground surface.



- 2) The steel protective cover and well casing will be removed to a depth of at least three (3) feet below grade using a backhoe.
- 3) Grout will be emplaced with a tremmie pipe.
- 4) Wells will be grouted shut from the bottom up to ensure a complete fill of the well casing.
- 5) Areas left exposed by excavation of wellheads will be backfilled and patched to match the existing grade. Any landscaping displaced by the abandonment will be replaced to original conditions.

Task 2 – Reporting of Well Plugging and Abandonment Procedures:

AMEC will prepare a letter report describing and documenting the plugging and abandonment procedures performed in the field as required by NMED. The report will be submitted within five working days of the completion of fieldwork.

SCHEDULE:

Upon your review and approval of this workplan, AMEC will perform the plugging and abandonment program within ten business days. It is GE's preference to perform this work within the month of September, and respectfully requests your review and approval of this workplan prior to Friday, September 15. You will receive a 2-day advance notice of planned field activities should you or your personnel desire to be onsite to observe the plugging and abandonment of the four monitoring wells. The final letter report will be submitted within five working days of the completion of fieldwork.

Please contact either Tom Antonoff of GE at (518) 385-9931 or the undersigned at (505) 821-1801 if you have any questions or concerns regarding this workplan.

Best Regards,

AMEC Earth and Environmental, Inc.

A handwritten signature in black ink, appearing to read "Peter Guerra".

Peter Guerra
Project Manager

A handwritten signature in black ink, appearing to read "Bertisabel M. Custer".

Bertisabel M. Custer, CHMM
Program Manager

cc: Mr. Thomas Antonoff, GE – Schenectady, New York
Ms. Rita Ware – USEPA