GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT
Ground Water Quality Bureau

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MARK E. WEIDLER
SECRETARY

FILE COPY

July 22, 1998

Pierce L. Chandler Jr.
1204 Bayshore
Rockwall, TX 75087

Dear Mr. Chandler:

Your May 18, 1998 Soil Vapor Workplan for the Sparton Technology site quoted consultant reports prepared for GTE and Digital that proposed soil vapor extraction (SVE) cleanup goals of 70 and 275 ppmv respectively. As stated in EPA's July 20, 1998 comments on your SVE workplan, these proposed goals were not the final remediation goals at these sites. Since the New Mexico Environment Department (NMED) did not approve these proposed goals and since your workplan did not reference the actual vapor concentrations at the time of site closure, I wanted to make sure that you had copies of the attached closure letters.

Digital's SVE system was closed in the attached September 28, 1995 letter from myself to John Zannos of Digital. The letter acknowledges that vapor levels had been reduced to less than 10 ppmv in all probes.

GTE's SVE system was closed in the attached October 23, 1997 letter from NMED Secretary Mark Weidler (written by myself) to Larry McMillen of Siemens and Alvin Ludwig of GTE. The letter acknowledges that average vapor levels had been reduced to 2-6 ppmv in the various remediation zones.

If you have any questions regarding these letters or if I may be of further assistance, please call me at 505-827-2831.

Sincerely,

Dennis McQuillan
Remediation Manager

xc Ana Marie Ortiz, Office of General Counsel
Michael Donnellan, DOJ
Mike Hebert, EPA
Jim Harris, Thompson & Knight

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EDGAR T. THORNTON, III
DEPUTY SECRETARY

September 28, 1995

Mr. John Zannos
Manager-Acquisition, Divestiture and Remedial Projects
Environmental Health and Safety
Digital Equipment Corporation
111 Powdermill Road
Maynard, Massachusetts 01754-1499

RE: **CONDITIONAL APPROVAL OF (INTERIM) GROUNDWATER TREATMENT SYSTEM DESIGN REPORT; CONDITIONAL APPROVAL OF SVE SYSTEM SHUT DOWN**

Dear Mr. Zannos:

The New Mexico Environment Department Ground Water Protection and Remediation Bureau (NMED) has reviewed various submittals from Digital Equipment Corporation (DEC) related to both site characterization and installation of a groundwater pump and treat system as discussed in: the February, 1995 Groundwater Treatment System Design Report, the Focused Feasibility Study from December, 1994, and your recent letter on Additional Characterization in Arroyo Area dated June, 1995. DEC and NMED have had considerable discussion in response to NMED's preliminary verbal comments to these submittals, and we appreciate the dialogue.

Proposed Groundwater Pump and Treat System

NMED conditionally approves the proposed groundwater pump and treat system outlined in the groundwater Treatment System Design Report, an Interim Remedial Action, with the following condition:

1) that all three extraction wells proposed be completed as multi-level wells with screens above and below the silty-clay aquitard.

The consideration is that Digital has asserted that above-standard contamination observed in GZ-14D would be addressed by pumping from the deep screens in EW-1 and EW-3. Given that within the last eight consecutive quarters sampling at GZ-14D has shown above-standard contamination, NMED considers it prudent to require that

EW-2 have a deep extraction screen. The deep zone has not been extensively pump-tested to yield site-specific hydraulic properties, and there is uncertainty about the configuration of above-standard groundwater contamination plume that may be encountered when extraction wells are finally installed and sampled. NMED believes it appropriate to require this additional screen installation to provide appropriate flexibility to address these uncertainties, and to avoid any potential delays in the start-up of a comprehensive groundwater remediation system.

Soil-Vapor Extraction

In the Focused Feasibility Study section 3.33 Comparison of Vadose Zone Remediation Standards, proposed Soil Remediation Standards have been derived from the SESOIL model and the proposed RCRA action levels. It is apparent from the practical experience in this case that the complexities involved in the contamination of ground water are many, leading NMED to question certain premises used in proposing these limits. NMED does not agree that the use of an annual rainfall of 12 inches per year presents a realistic modelling assumption for recharge at the site. This figure ignores potential recharge from other sources such as leaky sewers or arroyos which may have a locally profound effect on contaminant transport. NMED disagrees with the above assumption, since it is reasonable to assume that greater amounts of water recharge can be anticipated at such an industrial site. In spite of the repairs conducted to sewers at the site, future releases cannot be predicted; and hence proposed Soil Cleanup Standards must be set at more conservative lower levels.

NMED believes that significant remediation has been attained at the site in the area of the current soil-vapor extraction (SVE) system's operation. In fact, total VOC levels achieved by the system appear to have dropped below 10 ppmV/V in all probes by January, 1995. NMED believes that the asymptotic curve of contaminant concentration in the vadose zone demonstrates the effectiveness of contaminant mass removal at the known source area. The VOC aggregate total of 10 ppmV/V seems to have a low relative potential to contaminate groundwater, but only in the area of current SVE operation and probe locations. The concentration of contaminants present elsewhere may be higher. Consider the following:

1) Contamination of groundwater in the vicinity of the SVE system has been abated to below-standards.

2) A significant mass of contaminants has been removed from

the vadose zone in spite of beginning soil concentrations being largely below RCRA soil remediation Standards.

3) SESOIL modelling results originally predicted that groundwater contamination at the site would not exist, which was proven to be untrue. That was at least in part due to the localized recharge present from sewer leakage flushing contaminants to groundwater.

4) Similar recharge at a variable and unknown rate far above the 12 inches per year exists along the Bear Canyon Arroyo, where, coincidentally, above-standard chlorinated solvent contamination in ground water is present.

NMED suggests that, since practical experience has shown that the 10 ppmV/V level is achievable, and since unknown pathways of contaminant transport exist outside the areas that are being monitored, a conservative convention based upon achievable results for this site should apply for cleanup goals at this site. NMED believes the cleanup goal for total VOC concentrations should be 10 ppmV/V for the Digital site. Since monitoring results show this goal has been met in the area that has been ventilated, NMED hereby approves a long-term shutdown of the SVE system at its current location while other potential source areas are investigated. NMED also reserves the right to re-sample vapor probes during this SVE system shut-down period to observe any possible rebound concentrations that may occur.

NMED is in receipt of the recent DEC letter in which you state that the NMED effort to characterize soil gas near the Bear Canyon Arroyo might divert the resources, focus and attention of DEC. For the time being, NMED will respectfully disagree with the DEC assertion that "resolution of this matter via direct identification and remediation is problematic and uncertain". In fact, there may be significant certainty that a pump-and-treat remedy is inadequate if a large mass of contaminants in the vadose zone in that area is identified through this effort.

NMED remains concerned that a potentially significant vadose-zone source of groundwater contamination upgradient of GZ-02 may exist and intends to proceed with the installation of deep vapor probes in the vicinity of GZ-02 along the Bear Canyon Arroyo east and west of Jefferson. NMED offered the use of its drilling rig so as not to delay the important DEC work on ground-water remediation. NMED appreciates DEC's cooperation with and contribution to this effort.

NMED agrees that the prudent direction is to focus DEC efforts on the ground-water remedy at this time. Although NMED and DEC have had reasonable disagreements at times on the specifics of how to best clean this site up, DEC has always operated in good faith. We greatly appreciate that.

Sincerely,

Dennis McQuillan

Dennis McQuillan
Remediation Manager

DM/BES

xc: Baird Swanson, NMED District 1 Office
Marcy Leavitt, Chief, GWPRB
Kurt Montman, Albuquerque Environmental Health
Norman Gaume, Albuquerque Public Works

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MARK E. WEIDLER
SECRETARY

October 23, 1997

Larry R. McMillen
Vice President-Human Resources
Siemens Telecom Networks
900 Broken Sound Parkway
Boca Raton, Florida 33487

Alvin E. Ludwig
Assistant Controller, Operations Support
GTE Service Corporation
One Stamford Forum
Stamford, CT 06904

RE: Termination of Administrative Order on Consent (AOC) for the former GTE/Lenkurt (GTE) and current Siemens Telecom Networks (STN) facility at 501 Morris NE, Albuquerque, NM.

Dear Messrs. McMillen and Ludwig:

Pursuant to Section XXVI of the AOC, this letter provides written notice that STN and GTE have satisfied their obligations under the AOC, and that the AOC is hereby terminated. Based on work performed under the AOC, the New Mexico Environment Department (NMED) has determined that:

- ground water has not been contaminated by site-related compounds; and

- the vadose zone at the site has been remediated so that it is incapable of contaminating ground water, injuring human health, animal or plant life or property, or interfering with public welfare or use of property.

Monitoring of five ground-water wells over two years failed to detect site-related compounds. The vadose zone was remediated by soil-vapor extraction (SVE) of 1440 pounds of solvent resulting in the following reduction of average TCE vapor concentrations (ppmv):

Depth	pre-SVE	post-SVE	Reduction
shallow (20-40')	94	2	98 %
intermediate (60-90')	252	6	98 %
deep (150-350')	33	5	85 %

Additionally, the community relations and public participation requirements of the AOC were satisfied by NMED, STN and GTE by public meetings on March 28, 1996 and June 12, 1997, and by the issuance of a Fact Sheet.

NMED greatly appreciates the monitoring and corrective actions performed by Siemens and GTE at this site. If you have any questions regarding this AOC termination, or if potential purchasers have any questions about site conditions, please contact Dennis McQuillan of the Ground Water Quality Bureau at 505/827-2831.

Sincerely,

Mark E. Weidler
Environment Secretary

MEW/DM

cc: The Honorable Gary E. Johnson, Governor
The Honorable Mimi Stewart, State Representative
The Honorable Michael Brasher, City Councillor
The Honorable Pete Domenici, U.S. Senator
The Honorable Jeff Bingaman, U.S. Senator
The Honorable Steve Schiff, U.S. Representative
Kurt Montman, Albuquerque Environmental Health
Stephen Green, Cambridge Properties, Inc.
Ana Marie Ortiz, NMED Office of General Counsel
Dennis McQuillan, NMED Ground Water Quality Bureau
Baird Swanson, NMED District 1