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October 23, 2017

Mr. Michael Hebert  
US EPA, Region 6  
LA/OK/NM Team  
1445 Ross Avenue  
Suite 1200  
Mail Code 6SF-RL  
Dallas, Texas 75202-2733

Re: Changes to Extraction Rates  
Deep Zone Groundwater Treatment System  
South Valley Superfund Site  
Albuquerque, NM

Dear Michael,

GE conducted a routine review of the groundwater data collected at the Deep Zone Groundwater Remediation System. Based on the groundwater monitoring data, there are only two monitoring wells (P83-09D and WB-04(5)) that contain groundwater with a volatile organic compound (VOC) above its respective Applicable or Relevant and Appropriate Requirement (ARAR). The latest groundwater monitoring data indicates that TCE remains just above its ARAR in P83-09D, and 1,1-DCE and TCE remain just above their ARARs in WB-04(5).

Significant efforts have been made to target the two areas to remove the VOCs to below ARARs, but the data indicate removal has reached an asymptotic level. Figure 1 illustrates the location of the monitoring wells and Attachment A provides VOC concentration with time charts for these two monitoring wells.

### **Proposed Changes**

In an effort to improve VOC reduction, GE will modify the extraction rates within the current remediation system. Extraction wells EW-003R and EW-005 are closest to P83-09D and extraction wells EW-004 and EW-006 are closest to WB-04(5). GE will modify the extraction rates by turning off EW-003R and EW-006. GE will monitor groundwater levels of the surrounding wells to track the changes to the groundwater flow and containment. The table below illustrates the changes to the extraction system flow rates.

<b>TABLE 1</b>			
<b>Area</b>	<b>Extraction Wells</b>	<b>Current Rate (gpm)</b>	<b>Proposed Rate (gpm)</b>
P83-09D Area	EW-003R	250	0
	EW-005	100	100+
WB-04(5)	EW-004	145	145+
	EW-006	115	0

### **Schedule**

GE intends to alter the extraction rates as above beginning November 15, 2017. Groundwater levels from the surrounding monitoring wells will be collected in early November prior to changing the extraction rates as a baseline. Then groundwater levels will be collected again in December to begin evaluation changes to the flow regime.

GE will collect groundwater quality samples in accordance with the Performance and Compliance Monitoring Plan (PCMP) in Q2 and Q4 2018. In addition, GE will also collect groundwater samples from the 13 monitoring wells in Q1 and Q3 2018 (i.e. January and July 2018), as is the current practice.

Data from each groundwater level and quality monitoring event will be evaluated to observe changes to the VOC concentrations in the two subject monitoring wells and also evaluate containment. Progress will be noted in the monthly, semi-annual, and annual reports on the current report schedule.

Mr. Michael Hebert, EPA  
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**Closing Remarks**

We trust that the information provided herein is sufficient for agency review and approval of our request. If not, please contact Julie Einerson at 505-440-2905 or me at 303-332-5757 and we will provide the information required.

Very truly yours,

Axis Group Inc.



John W. Billiard, P.E.  
Technical Services Director

Enclosures

Cc: Mr. Allan Pasteris, NMED  
Mr. Randall McAlister, GE Remedial Programs  
Mr. Roger Florio, GE Corporate, Counsel, Remediation  
Ms. Julie Einerson, GE/Genesis

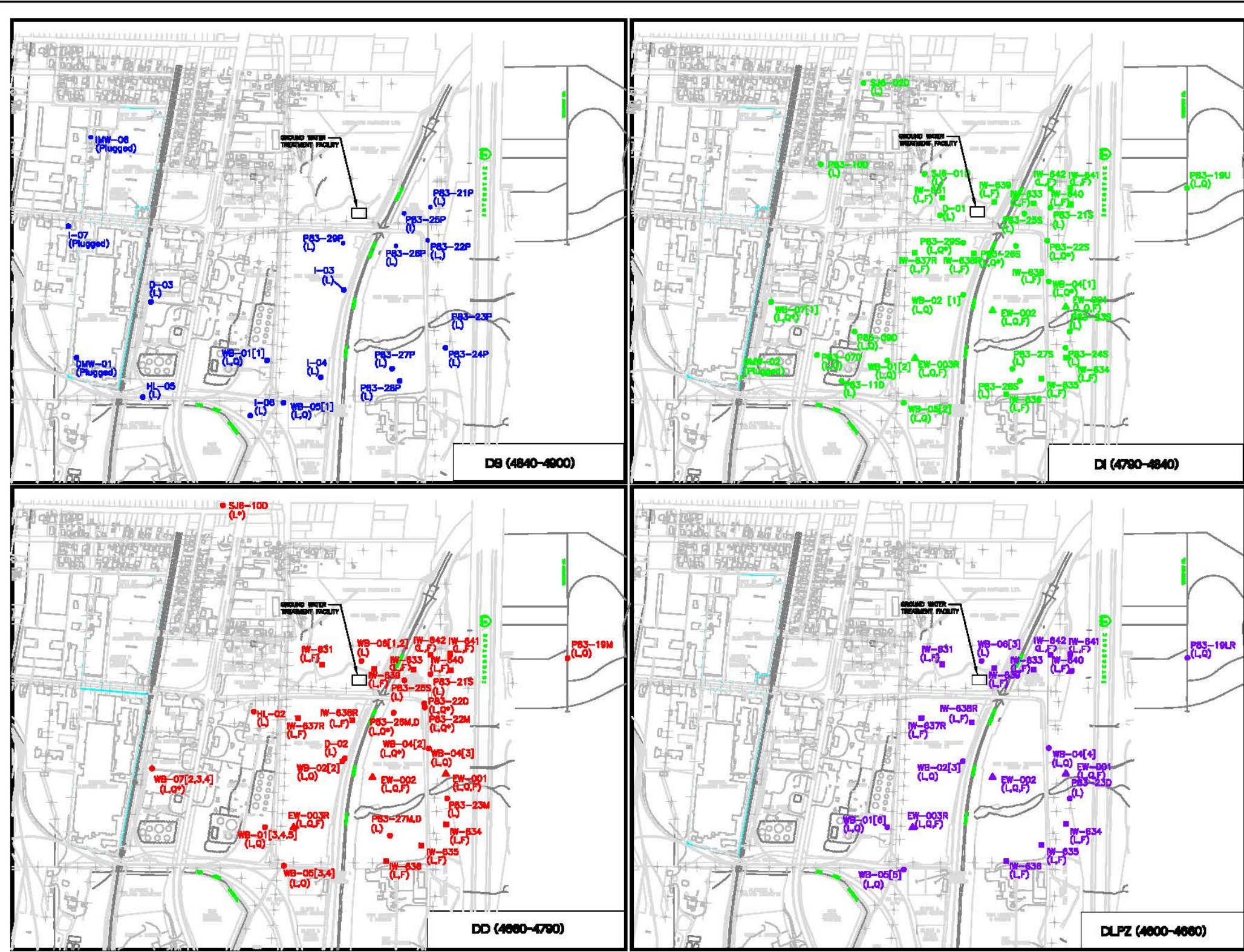
## FIGURE

### Figure 1A and 1B Deep Zone Well Locations

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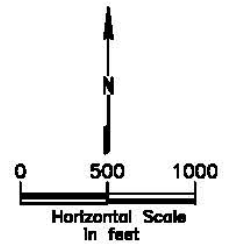
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Approximate Existing Ground Surface		Elevation, Feet (MSL)		2002 Technical Memorandum Refined Model Layers		Vertical Scale	
EPA-Approved Deep Zone Intervals	100% Design Model Layers						
Deep Shallow (DS) Zone	4870-4900 Layer 1	4870	4870	①	30'	10'	
	4840-4870 Layer 2	4840	4840	②	30'		
		4840	4830	CLAY	③		40'
Deep Intermediate (DI) Zone	4790-4840 Layer 3	4790	4790	④	50'	80'	
	4740-4790 Layer 4	4740	4740	⑤	50'		
Deep Intermediate/Deep Deep (DI/DD) Zone	4680-4740 Layer 5	4680	4680	⑥	30'	300'	
	4600-4680 Layer 6	4600	4600	⑦	30'		
Below Deep Low Permeability (BOLP) Zone	4500-4800 Layer 7	4500	4575	⑧	25'	300'	
		4500	4550	⑨	25'		
		4500	4525	⑩	25'		
		4500	4500	⑪	25'		
		4500	4475	⑫	25'		
		4200-4500 Layer 8	4200	4200	⑬		300'
		3900-4200 Layer 9	3900	3900	⑭		300'
			3900	3900			
			3900	3900			
			3900	3900			

**NOTE:** MONITORING WELLS S16-07D AND S16-08D ARE MONITORED ANNUALLY DURING THE SAN JOSE-8 SAMPLING EVENT. THESE WELLS DO NOT APPEAR ON THIS FIGURE BECAUSE THEY ARE SCREENED BELOW ELEVATION 4800.



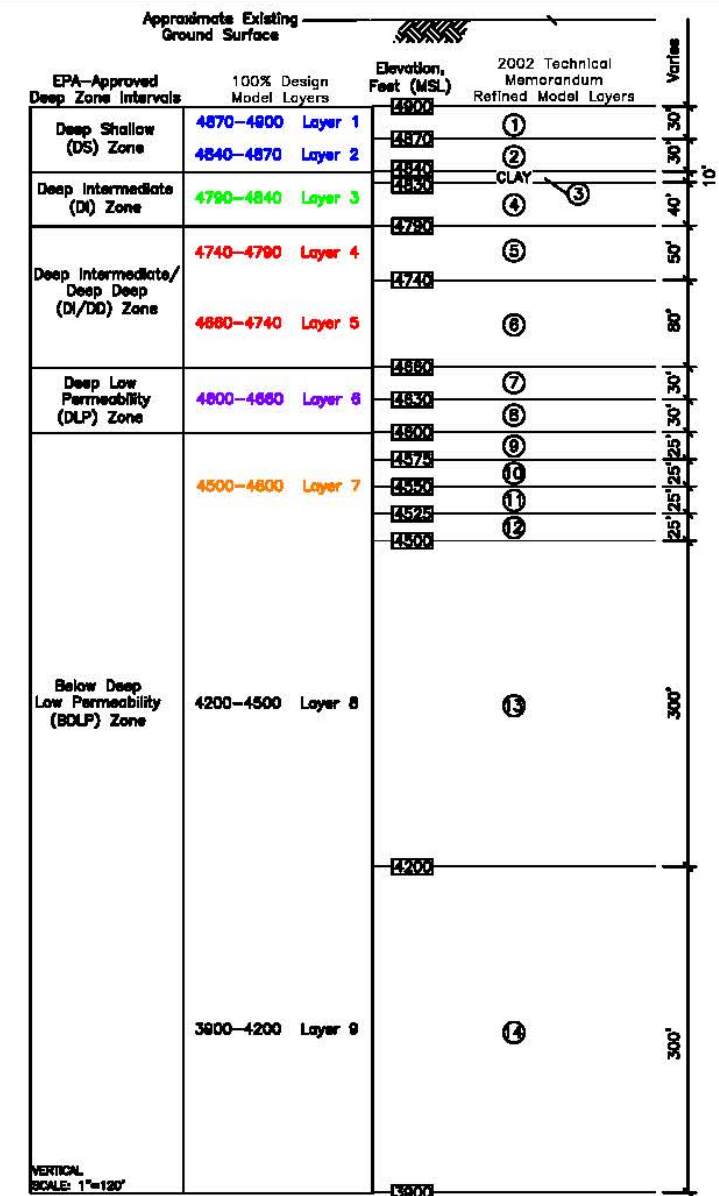
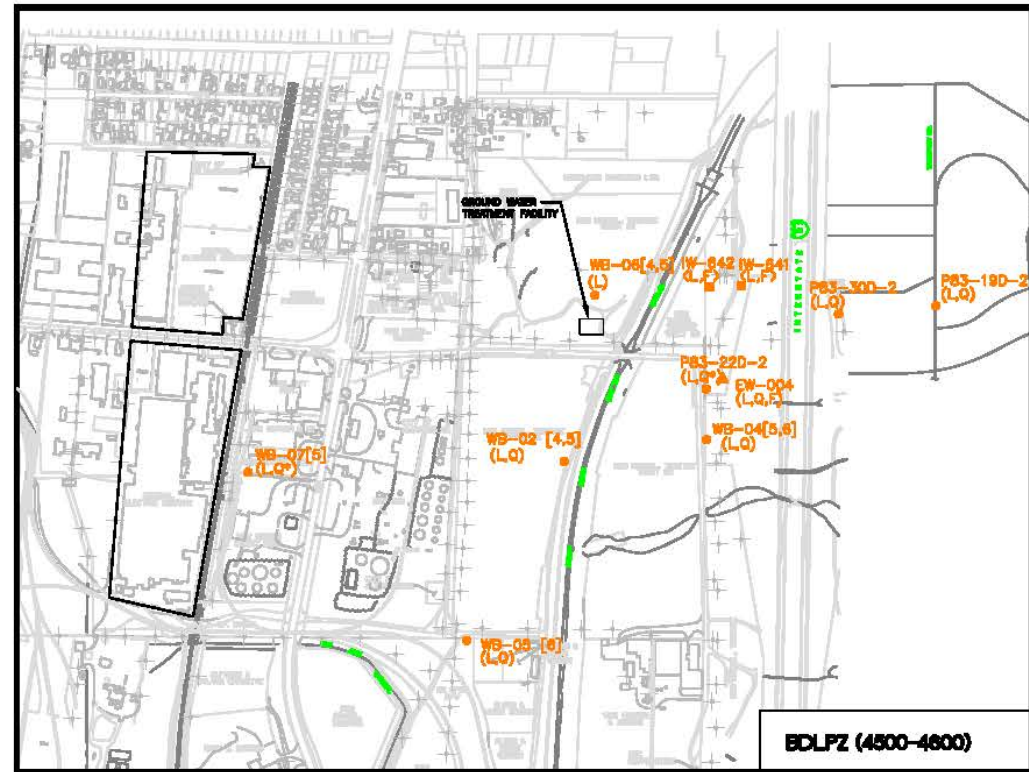
- LEGEND:**
- MONITORING WELL LOCATION AND DESIGNATION, (L) INDICATES GROUND WATER LEVEL MONITORING LOCATIONS, (Q) INDICATES WATER QUALITY MONITORING LOCATIONS
  - ▲ EXTRACTION WELL LOCATION AND DESIGNATION, (L) INDICATES GROUND WATER LEVEL MONITORING LOCATIONS, (Q) INDICATES WATER QUALITY MONITORING LOCATIONS, (F) INDICATES FLOW RATE MONITORING LOCATIONS
  - INJECTION WELL LOCATION AND DESIGNATION, (L) INDICATES GROUND WATER LEVEL MONITORING LOCATIONS, (F) INDICATES FLOW RATE MONITORING LOCATION
  - WELL MONITORED DURING THE ANNUAL SJ-8 EVENT ONLY



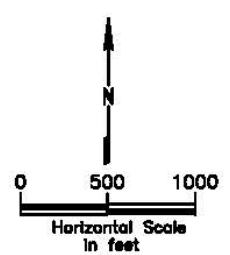
Wells Located Within  
The Deep Aquifer Zones  
General Electric Operable Unit  
Albuquerque, New Mexico

DRAWN LDS	JOB NUMBER AXISBQ	APPROVED JWB	DATE 10/2017	REVISED DATE
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FIGURE  
**1A**



**NOTE:** MONITORING WELLS SJ6-07D AND SJ6-08D ARE MONITORED ANNUALLY DURING THE SAN JOSE-8 SAMPLING EVENT. THESE WELLS DO NOT APPEAR ON THIS FIGURE BECAUSE THEY ARE SCREENED BELOW ELEVATION 4800.



- LEGEND:**
- MONITORING WELL LOCATION AND DESIGNATION. (L) INDICATES GROUND WATER LEVEL MONITORING LOCATIONS, (Q) INDICATES WATER QUALITY MONITORING LOCATIONS
  - WELL MONITORED DURING THE ANNUAL SJ-8 EVENT ONLY



Wells Located Within  
The Deep Aquifer Zones  
General Electric Operable Unit  
Albuquerque, New Mexico

FIGURE  
**1B**

DRAWN LDS	JOB NUMBER AXISABQ	APPROVED JWB	DATE 10/2017	REVISED DATE
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## **ATTACHMENT A**

### **VOC Concentrations with Time P83-09D WB-04(5)**

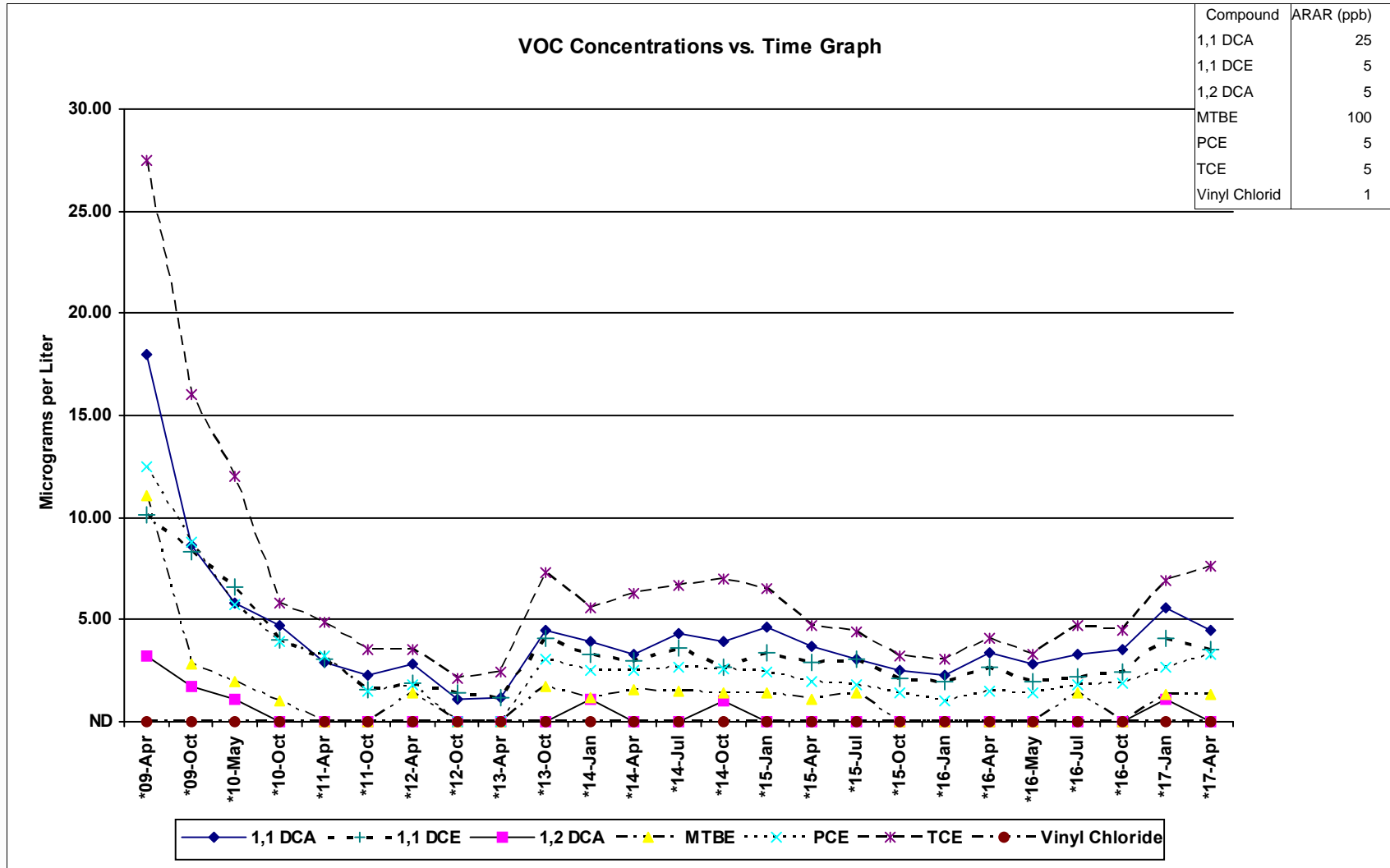
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VOC Concentrations over Time - Conventional Wells  
 P83-09D  
 Deep Zone Groundwater Remediation System  
 Former Air Force Plant 83/General Electric Operable Unit - Albuquerque, New Mexico  
 [Concentrations in Micrograms Per Liter (ug/l)]





VOC Concentrations over Time - Westbay Monitoring Wells  
 WB-04(5)  
 Deep Zone Groundwater Remediation System  
 Former Air Force Plant 83/General Electric Operable Unit - Albuquerque, New Mexico  
 [Concentrations in Micrograms Per Liter (ug/l)]

