

NMD98074558
RD

Geoscience Consultants, Ltd.

500 Copper Avenue N.W. Suite 200
Albuquerque, New Mexico 87102
(505) 842-0001 FAX (505) 842-0595



RECEIVED
EPA REGION VI

1990 JUN -8 PM 1:28

SUPERFUND BRANCH

June 7, 1990

Mr. Tim Underwood
OK/NM Superfund Enforcement Section (6H-EO)
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

RE: QAPjPs FOR USAF/GE PLANT 83 AND SAN JOSE-6

Dear Mr. Underwood:

Attached are the Quality Assurance/Quality Control Project Plans (QAPjP) for both the USAF/GE Plant 83 and San Jose-6 operable units. The QAPjPs have been revised in accordance with the comments made in your letter, received May 2, 1990. Each numbered comment has been addressed and a brief response, with numbers correlating to your comments made in the May 2 letter, outlines the corrections or additions to the text. Other changes to the QAPjP, other than grammatical changes, have also been noted in the responses.

RESPONSE TO EPA COMMENTS FOR SAN JOSE-6 OPERABLE UNIT

- 1) An approval page containing the appropriate signature lines for approving personnel has been inserted directly following the title page.
- 2) Section 2.0 has been changed to Project Organization and describes the responsibilities for key GCL and GE personnel. A project organization chart has also been included. The old Section 2.0 Quality Assurance Objectives and all following sections have been changed to reflect the insertion of this new section.
- 3) Page 12 now contains a reference to Appendix A and Appendix B for the decontamination procedures for the drilling rig, equipment and the disposal of said fluids.
- 5) Section 9.4 (Final Reporting and Data Archival) now located on page 19 has been changed to incorporate the type of reports that will be submitted to support data validation. Documents will now be archived for a minimum of 6 years after termination of the administrative order, and EPA will be notified 30 calendar days prior to the destruction of any document.
- 6) Section 11.0 (Preventative Maintenance Procedures) p. 22 now stipulates that copies of preventative maintenance logbooks will be supplied from the laboratory.
- 7) Section 3.0 of Appendix A has been expanded to include the well screen slot size and the criteria used to select it.

9063349



Mr. Tim Underwood
June 7, 1990
Page Two

- 8) Appendix A Section 3.0 now specifies that bentonite pellets will be used below the water table and bentonite powder will be used above the water table. Bentonite powder will be hydrated with 10 gallons of water.
- 9) Tolerances for the pH, conductivity and temperature have been added to Section 4.0 Appendix A and Section 4.0 Appendix B. Section 4.0 of Appendix A has also been expanded to address the potential problem of contaminated development fluids.
- 10) Section 2 of Appendix B now specifies the use of a bentonite drilling fluid for mud rotary drilling.
- 11) The criteria used for selecting the predetermined depth for surface casing is that the surface casing will be placed 15 feet above the top of the screened interval which has already been determined for the shallow intermediate and deep intermediate screened zones (Appendix B 2.0).
- 12) Section 2 of Appendix B has been modified to specify a cement slurry containing 5% bentonite to be used to grout the surface casing in place and will be allowed to cure at least 12 hours before drilling resumes.
- 13) Appendix B Section 3.0 has been modified to include the criteria used to select the screen slot size.
- 14) After reviewing the list of known contaminants and their compatibility with PVC it was determined that the use of PVC below the water table would not jeopardize the integrity of the ground water samples nor be subject to degradation by the contaminants (Parker, L.V., Hewitt, A.D. and T.F. Jenkins, Spr 1990, Ground Water Monitoring Review, Vol. 10 No. 2 p. 146-177). Section 3.0 has been modified to specify procedures for the use of a combination of stainless steel and PVC screen and casing.
- 15) Appendix C Section 3.7.2 now references Appendix F-5 for analytical methods.
- 16) Appendix D now includes references for equations that will be used for packer leakage calculations. Procedures and explanations of procedures have also been imported from GCL's San Jose-6 Remedial Design (Section 3.5) to elaborate on the details for the testing of the SJ-6 well.
- 17) References for all Appendices have been checked and corrected. Article 4-14 of the New Mexico rules and Regulations (State Engineer, 1966) was added to Section 2.0 of Appendix E. Section 3.4 (San Jose-6 Remedial Design) "Clean-out and Plug Abandoned Wells" was added for additional well plugging information to section 2.0 of Appendix E. To clarify any questions referring to the sealing of the wells, Section 3.6 (San Jose-6 Remedial

Mr. Tim Underwood
June 7, 1990
Page Three

Design) "Well Abandonment Procedures" and Section 2 of Appendix D (San Jose-6 Remedial Design) "Sealing of Wells" were added to Section 3.0 of Appendix E. A reference was added to Section 4.0 of Appendix E from the San Jose-6 Remedial Design.

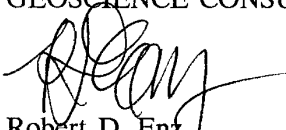
RESPONSE TO EPA COMMENTS FOR USAF/GE PLANT 83 OPERABLE UNIT

- 1) An approval page has been inserted directly following the title page containing the appropriate signature lines for approving personnel.
- 2) Section 2.0 has been changed to Project Organization and describes the responsibilities for key GCL and GE personnel. A project organization chart has also been included. The old Section 2.0 Quality Assurance Objectives and all following sections have been changed to reflect the insertion of this new section.
- 3) Additions have been made to Section 4.5 (Aquifer Tests) to further qualify techniques and equipment to be used in the pump testing and slug testing.
- 4) Comments have been added to Section 4.6 addressing the fact that specific models will be selected dependent on interpretation of hydraulic properties of the aquifer.
- 5-7) Section 4.7 (Soil Vapor Extraction Monitoring) has been modified to incorporate the type of monitoring and sampling that will be conducted for this system. Section 4.8 (Air Stripper Monitoring) has been modified to incorporate the same type of information required for Section 4.7.
- 8) Section 9.4 has been changed to accommodate Section VIII of the Administrative Order for this operable unit. Records will be kept a minimum of 6 years after termination of the administrative order and EPA will be notified 30 calendar days prior to the destruction of any documents.
- 9) Section 3.2 of Appendix A has been expanded to include descriptions of surface characteristics at all sampling locations.
- 10) Section 3.8 of Appendix A has been modified to exclude the use of tape on vapor probes. Clean, small gauge steel wire will be the method used to secure drive points to vapor probes.
- 11) Section 3.16 of Appendix A has been expanded to include more detailed analytical procedures and equipment specifications to be used during the soil vapor study.
- 12) A table has been added to Section 3.19 of Appendix A to record pertinent information for each soil vapor point.

Mr. Tim Underwood
June 7, 1990
Page Four

- 13) Section 3.0 of Appendix B has been expanded to include the well screen slot size and the criteria used to select it. Bentonite pellets will be used below the water table and bentonite powder will be used above the water table. Bentonite powder will be hydrated with 10 gallons of water.
- 14) Section 4.0 of Appendix B has been expanded to address the potential problem of contaminated development fluids.
- 15) Tolerances for the pH, conductivity and temperature have been added to Section 4.0 Appendix B and Section 4.0 Appendix C.
- 16) Section 2.0 Appendix C has been modified to include the use of bentonite mud drilling fluid and the use of a cement slurry containing 5% bentonite to grout the surface casing in place. The cement slurry will be allowed to cure for at least 12 hours before drilling resumes.
- 17) Section 2.0 Appendix C now stipulates that the surface casing will be set 15 feet above the top of the screened interval.
- 18) Section 3.0 Appendix C now contains the same criteria for the well screen and well screen selection as Section 3.0 Appendix B. After reviewing the list of known contaminants and their compatibility with PVC it was determined that the use of PVC below the water table will not jeopardize the integrity of the ground water samples nor be subject to degradation by the contaminants (Parker, L.V., Hewitt, A.D. and T.F. Jenkins, Spr 1990, Ground Water Monitoring Review, Vol. 10 No. 2 p. 146-177.)

Sincerely,
GEOSCIENCE CONSULTANTS, LTD.



Robert D. Enz
Program Manager

RDE/lc/0402/EPARES83.LTR

cc: Sheri Sinclair, NMEID
Julie Einerson, GE