



MWH

December 5, 2006

Mr. Sin-Kie Tjho
Caribbean Section
RCRA Programs Branch
US EPA – Region 2
290 Broadway
New York, NY 10007-1866

Re: Progress Update
GE Puerto Rico Investment, Inc. at Patillas, Puerto Rico
EPA ID# PRD090492109

Dear Mr. Tjho,

On behalf of General Electric Consumer and Industrial (GE), MWH is submitting this letter to provide an update on recent activities conducted at the GE Facility located in Patillas, Puerto Rico.

In a letter dated September 1, 2005 (Attachment 1), the EPA responded to the submittal of the Supplemental RFI (February 2005), requesting additional data prior to submittal of a “Groundwater Migration Under Control” (CA-750) determination.

GE proposed the following additional off-site activities:

- Perform three additional rounds of groundwater sampling at 7 off-site wells,
- Locate and sample well P-12, if possible, and
- Additional monitoring well clusters to determine the down-gradient boundary of the plume.

GE has completed the following activities:

- Three sampling rounds at the 7 off-site wells. Samples were collected in December 2005, May 2006, and August 2006. See Attachment 2 for a posting map of the analytical results.
- During December 2005, efforts to locate well P-12 were done based on the previously surveyed coordinates using a portable GPS and the previous consultant (Mike Pelletier, EarthTech) that installed the well. However, the P-12 well was not found, and is presumed destroyed, as we were made aware of construction activities performed by others that occurred in this area.
- Installed one additional off-site well cluster (P-20S/P-20D) in a location approved by the EPA. These wells were installed in May 2006, and sampled in May and

August 2006. See Attachment 2 for a posting map of the analytical results. After the analytical results were received from P-20S / P-20D, GE communicated the results to the EPA on July 10, 2006.

In a teleconference held July 18, 2006, the EPA requested that GE continue to pursue further efforts to obtain off-site access to install an additional well cluster down-gradient of well cluster MW-19S/D and southwest of well cluster MW-20S/D (as illustrated on the figure provided in Attachment 3). Attachment 4 provides a copy of the email from the EPA requesting GE to continue to pursue access to the property for additional wells.

Offsite Access Efforts

A chronology of contact with neighboring property Custodian-in-Fact, Mr. Secundino Cora is summarized below;

- September 12, 2006: Roberto Miranda EHS Island Manager of Caribe GE-Puerto Rico operations, met with Mr. Cora to inform him of GE's interest in installing additional monitoring wells on the property, of which Mr. Cora has represented in the past to GE that he is the Custodian-in-Fact.
- October 10, 2006: Mr. Miranda spoke with Mr. Cora requesting access.
- October 26, 2006: A formal letter from GE requesting access was provided to Mr. Cora.
- October 31, 2006: Mr. Miranda called Mr. Cora requesting a response for the access letter.
- November 1, 2006: Mr. Miranda called Mr. Cora again to see if there has been a response to the letter from the owners to which Mr. Cora responds that no response has been received yet.
- November 9, 2006: Mr. Miranda called Mr. Cora; again no response.
- November 30, 2006: Signed access agreement was obtained from Mr. Cora. A copy of the signed access agreement is provided as Attachment 5.

GE understands that Mr. Secundino Cora is the Custodian-in-Fact of the neighboring property where additional off-site wells are being considered and Mr. Cora has provided access to said property in the past. However, as a measure of due diligence, GE is in the process of confirming this latest agreement, in view of Mr. Cora's recent statements to Roberto Miranda that he had to go through a process of obtaining an approval response from *new* owners, in order to sign the updated access agreement allowing installation of new wells.

Path Forward

Once this agreement is duly confirmed, we will develop a schedule for installing the additional well cluster. GE and MWH would like to arrange for a conference call with you to discuss the path forward options for this project.

If you have any questions or comments on the information provided in this letter, please do not hesitate to call Mike Goldstein at (502) 452-3468 or myself at (610) 407-7942.

Sincerely,

A handwritten signature in cursive script, appearing to read "William Bowen".

William Bowen
Project Manager

cc: Michael Goldstein, GE
Amir Lastra, Caribe GE
Christina Archer, GE
Roberto Miranda, Caribe GE

Attachments: Attachment 1 – EPA Letter dated September 1, 2005
Attachment 2 - VOC Analytical Results Posting Map
Attachment 3 – Proposed Well Location Map
Attachment 4 – Copy of Email Requesting GE to Pursue Access for
Additional Wells
Attachment 5 – Access Letter signed by Mr. Cora on November 30, 2006

ATTACHMENT 1
EPA LETTER DATED
SEPTEMBER 1, 2005



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mike Goldstein
Global Remediation Manager
Environmental Health and Safety
Appliance Park, AP26-100
Louisville, KY 40225

Re: Review of Supplemental RFI Report
GE Puerto Rico Investment, Inc. at Patillas, Puerto Rico
EPA ID # PRD090492109

Dear Mr. Goldstein:

The United States Environmental Protection Agency (EPA) has completed its review of the Supplemental RCRA Facility Investigation (RFI) Report submitted in February 2005 by GE Puerto Rico Investment, Inc (GE) for its facility located at Patillas, Puerto Rico. This Report was submitted to EPA to summarize the off-site sampling activities conducted in accordance with the Work Plan dated June 2003.

As you know, prior to the recent installation of the seven groundwater monitoring wells P15 thru P18D, there was only one effective off-site monitoring well (i.e., P12) located roughly 1400 feet from the nearest on-site monitoring well (P10), making it impossible to characterize the full extent of the groundwater plume from the GE facility. Consequently, the purpose of the current sampling activities was to collect the groundwater data necessary to delineate the nature and extent of the groundwater plume. Both EPA and GE realized this and subsequently agreed, at the February 2003 meeting, that GE would initiate necessary groundwater sampling activities required achieve a "Groundwater Migration Under Control" (CA-750) determination. In addition, the supplemental data collection effort would also support GE's investigation of potential natural attenuation.

While the Report contains useful information regarding the extent of the plume and natural attenuation issues, based upon EPA's review of the data contained in the Supplemental RFI Report, it is clear that after the very first round of groundwater sampling event conducted at the 7 new wells located outside of the facility boundary, there is still not sufficient information to determine the extent of the groundwater plume, to make a CA-750 determination or make a determination on the processes governing natural attenuation. As a result, EPA disagrees with GE's conclusion that the extent of off-site contamination in the groundwater has been delineated as stated in the Report.

Through a series of discussions between EPA and GE representatives, EPA understands that GE has agreed to perform additional off-site sampling activities based upon the following framework of understanding:

1. EPA and GE agree that one of the objectives of the current site investigation effort include the CA-750 determination, which has been rescheduled for Sept 2006.
2. Due to the stability and consistent trends shown in on-site well data, EPA agrees that on-site sampling can be temporarily suspended while the off-site sampling is being conducted.
3. If the off-site plume is sufficiently and appropriately delineated, and not expanding, then a positive CA-750 determination could be made by the end of FY 2006.
4. The major issue is the delineation of the down-gradient off-site boundary of the plume. As agreed, the

following outlines the additional groundwater sampling activities to be performed in an attempt to delineate the plume off-site

- 4a. GE will perform three more rounds of sampling at the 7 new wells in 2005 and 2006
- 4b. To supplement the effort to determine the down-gradient boundary of the off-site plume, GE will sample the P-12 shallow well, if it could be located.
- 4c. In conjunction with the results of steps 3a and 3b above, GE agrees to propose one or more additional well clusters, as needed, to determine the down gradient boundary of the plume.

If the above conditions are consistent with your understanding of the mutual agreement that was reached, then please submit a written plan for the additional investigation work in accordance with the above-mentioned points within 30 days.

Although EPA disagrees with the premise that the plume has been delineated, the Report does contain useful data and information regarding Monitored Natural Attenuation (MNA) which could be used for supporting the recommendation of MNA as one of the feasible remedial options. Therefore, EPA has decided to include the attached comments pertaining to MNA in the belief that these comments would be useful for the next stage (i.e., CMS) of the corrective action process. In addition, please bear in mind that these comments could be changed depending upon the results of upcoming sampling activities which GE has agreed to perform.

If you have any questions regarding the above, please contact Sin-Kie Tjho of my staff, at (212) 637-4115.

Sincerely,



Dale J. Carpenter, Chief
Caribbean Section
RCRA Programs Branch

cc: Carmello Vazquez, EQB

ATTACHMENT I

GENERAL COMMENTS

1. Although information necessary to support GE's recommendation that Monitored Natural Attenuation (MNA) be selected as a final remedy has been presented in the Supplemental RFI and, by way of reference in historical documents, further details regarding certain supporting evaluations, as well as a more comprehensive discussion concerning remedy implementation are necessary. It is recommended that the requested information further detailed in the following comments be provided in a revised Supplemental RFI and/or subsequent documents (e.g., revised Corrective Measures Study [CMS] or CMS addendum).
2. * A critical component of a successful MNA remedy for groundwater is a comprehensive long term groundwater monitoring program (LTMP). Although it appears that quarterly groundwater sampling has been conducted for a number of years, there is no current LTMP that adequately addresses all facets of natural attenuation or natural attenuation remedy in both the shallow and deep aquifers (as well as potentially surface water and sediment). Data gaps associated with historical groundwater monitoring activities have been identified and, in part, supplemented through the completion of the recent RFI activities. As stated in Section 5.7.2, Assessment of Natural Attenuation as a Remedial Alternative (bullet 3, page 5-23), a key component of a successful MNA remedy includes "Implementation of a well-designed monitoring program, with a back-up contingency plan if MNA is not sufficient..."
- * At the appropriate time, IF MNA is to be implemented, the existing groundwater monitoring program shall be thoroughly evaluated and revised, where necessary, to ensure successful implementation of any MNA remedy. Furthermore, future revisions and/or subsequent monitoring reports shall incorporate all necessary MNA parameters, break-down product analyses, trend analyses, etc., similar to that contained in the Supplemental RFI.
3. Data gaps associated with the groundwater monitoring program related to historical RFI and CMS activities required installation of additional groundwater monitoring wells, addition of MNA-related analytes and an updated evaluation of extent and nature of contamination, among other activities. Partial resolution of some of these data gaps, as presented in the Supplemental RFI, appears to address some of the previously identified data gaps that hindered a complete evaluation of the applicability of the MNA in previous CMS evaluations. As stated above and in these comments, additional information will be necessary to sufficiently resolve data needs. EPA anticipates additional data will be generated. In light of this recent data and any future data generated, the information shall be presented in the context of a revised CMS or CMS Addendum document. It is further recommended that such a document include a more comprehensive discussion and justification of corrective measures issues which were previously incomplete or have been altered based on recent data (i.e., cleanup time frames, costs, LTMP, etc.).
- * 4. There are a number of uncertainties whether the degradation processes that have been identified with two of the most persistent remaining contaminants are occurring, or will occur, to completion at this site. Figure 5-1 indicates that 1,1-dichloroethene (1,1-DCE) should proceed to vinyl chloride through anaerobic biodegradation. Likewise, 1,1-dichloroethane (1,1-DCA) is noted to breakdown to chloroethane through anaerobic degradation. However, Section ES.2.4 of the Supplemental RFI states "reductive dechlorination is no longer occurring, and that further breakdown of DCE must continue through abiotic oxidation reactions." If there is evidence of abiotic oxidation in the areas where 1,1-DCE and 1,1-DCA are present, it shall be provided.

In addition, it is unclear if any of the expected 1,1-DCE and 1,1-DCA breakdown products have been adequately monitored and/or evaluated. Much of the evidence does not support an interpretation that anaerobic biodegradation is occurring (e.g., lack of carbon source) and more recent data trends suggest that remaining contaminant concentrations are fairly stable, particularly in the deeper aquifer zone. Based on these factors and the discussion of limitations on the mechanisms that appear to be occurring locally (Section 5.7.1), it is not unlikely that 1,1-DCE and 1,1-DCA will ultimately break down. The apparent discrepancy between Figure 5-1 and the conclusion that abiotic oxidation will be a primary attenuation mechanism shall be evaluated and discussed further. In addition, given the potential issues with degradation of 1,1-DCE and 1,1-DCA, it will be necessary to evaluate whether remediation goals can be achieved in a reasonable time frame. This concern should likely be addressed in a revised CMS or CMS Addendum document before selection of MNA as a remedy can be fully considered.

5. The assumptions used in the MNA Toolbox evaluation are not conservative and will not result in a reasonable interpretation of the potential for MNA to be effective. Section 5.5 indicates that the actual calculated mass for 1989 was 33 pounds. However, an estimated mass of 80,000 pounds was actually used as the initial mass. There are two concerns resulting from this assumption. First, the increase in contaminant mass appears to be unreasonable given the disparity with the actual monitoring data. By increasing the initial mass so significantly at the beginning, it almost guarantees that the lower concentrations observed later will support an interpretation of MNA.

Secondly, it is not appropriate to consider a significant source removal as part of the calculation for "natural" attenuation. While it is understood that the removal of the French Sump significantly decreased the contaminant mass in the system, it should not be considered as a reduction accomplished through natural mechanisms. Any evaluation shall begin with monitoring data collected after the source removal was performed. If the MNA Toolbox evaluation is to be used to support the selection of MNA as a remedy, more conservative assumptions shall be used and comprehensive discussion provided in subsequent documents.

6. The Supplemental RFI indicates that groundwater nearby and/or downgradient of the GE facility is not utilized as a source of drinking water. However, it is unclear whether land use controls (LUCs) or other appropriate restrictions on groundwater use have been instituted to prevent this and other potential exposures (e.g., through agricultural use, etc.). LUCs shall be further detailed in subsequent documents (e.g., revised CMS, CMS Addendum or CMI).
7. No consideration has been given to the future land use, including the possibility of future residential redevelopment. The CMS shall consider whether the Site could possibly be used for residential or recreational purposes in the future and indicate whether institutional controls will be implemented. In addition, it is noted that the last land use reconnaissance was conducted in 1990. The document shall be revised to indicate whether property adjacent to the site has been recently evaluated for the presence of groundwater wells and/or buildings that may be affected by contaminants in groundwater originating from beneath the facility property.

SPECIFIC COMMENTS

1. Section 1.2.3.1 RCRA Facility Investigation Report According to page 5, there are "no potential receptors (human and ecological) that have been identified in the area between the Site and the Rio Grande de Patillas". However, the text in Section 3.2 indicates that this area is used for agricultural purposes which would ultimately effect receptor populations. Therefore the text shall be revised to include a discussion of

the potential receptor populations, exposure points and routes at the Site. Also, the distances to the nearest residential areas and subpopulations shall be provided.

2. Section 3.2 Land Use: The principal land use downgradient of the Site is described as primarily agricultural. GE shall specify exactly what types of human activities are associated with the agricultural area. In this discussion clarify if this agricultural area is used for local populations or commercial farming. Additionally, clarification shall be provided concerning any activity patterns in this agricultural area (e.g. percentage of time a worker may be in this area, accessibility to children, etc.).
3. Section 3.8, Local Groundwater Use, Page 3-9: This section indicates that potential contamination of nearby public drinking water supply wells by activities associated with GE "is not possible." However, little detail is provided to support this conclusion. The Supplemental RFI and/or subsequent document(s) shall be revised to provide a discussion or reference to a historical discussion justifying this conclusion.
4. Section 4.1.1, Interpretation of Historical Water Quality results, Page 4-2: This section, among others, states that, based on the completion of French Sump removal activities in 1990, "...there is no more source material to contribute to the plume from the upgradient end." Although it is agreed that the removal action has likely all but eliminated the volume of source material, this statement is a bit presumptive as the potential for residual, low-level contamination remains. Therefore, this sentence shall be revised to indicate that the potential for contaminant contribution from this area is minimal.
5. Section 4.2, Soil Gas Investigation, Page 4-3: This section indicates that detections of volatile organic compounds (VOCs) in the shallow groundwater are likely the result of the upward migration of contamination present in the deep groundwater. However, Section 3.7.2.1, Head Differences Between Well Pairs (page 3-9) indicates that groundwater elevations in well pairs in on-site wells demonstrate a downward migration potential, and notes a "strong downward potential in the vicinity of the plant..." As a result, it is unclear how contaminants would migrate upward against the observed gradient. The Supplemental RFI and/or subsequent document(s) shall be revised to address this inconsistency.
6. Section 4.5 Characterization of Contaminants in Exposure Media:
This section provides an outline of the screening and development of the list of chemicals of potential concern (COPCs). The presence of chloroform shall be considered a contaminant of concern (COC) unless GE can demonstrate that it is not related to a release at its facility. The text shall explain the mobility, persistence, treatability, bioaccumulation and any special exposure routes of related to chloroform that as it relates to the Site.
7. Section 5.7, Summary of the Natural Attenuation Evaluation, Page 5-20: This section references Figure 5-8 which reportedly demonstrates a reduction in contaminant plumes since 1989. However, the purported reduction depicted on this figure is simply explained by the better definition (compared to the historical plume maps) achieved by the additional sampling points (i.e., the downgradient extent of contamination was not clearly defined in 1989). The historical plume maps cannot be directly compared with the isoconcentration maps generated by the most recently installed monitoring wells. Different sampling points were used at different times to generate the two maps rendering a direct comparison inappropriate. In addition, the current contaminant concentrations were actually higher in several locations when compared to the 1989 data, calling into question whether the plume has decreased in size. When considered in conjunction with concerns regarding extent of contamination (as discussed in comments above and below), the discussion presented in this section and the associated figure are not appropriate and will need revision.

8. Section 5.7.2, Assessment of Natural Attenuation as a Remedial Alternative (bullet 3, page 5-24): This bullet indicates that a time frame of approximately 15 years will be required to achieve groundwater contaminant concentrations below MCLs. However, it is unclear on what information this conclusion is based. It is also unclear whether this estimate applies to shallow and/or deep groundwater contamination. As previously noted, contaminant concentrations have remained stable throughout the history of site investigations. A more detailed analysis and discussion of cleanup time frames with respect to both shallow and deep groundwater contamination will be required in the CMS.

ATTACHMENT 2
VOC ANALYTICAL RESULTS POSTING MAP

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P-15DD (Screened 68.5 - 73.5 feet BGS)							
Analytical				June 2004	Dec. 2005	May 2006	Aug. 2006
Group	Constituent	Units	MCL	Result	Result	Result	Result
VOCs	1,1,1-Trichloroethane	ug/l	200	0.5 J	< 0.8	< 0.8	< 0.8
	1,1-Dichloroethane	ug/l	NS	2.1	2 J	2 J	2 J
	1,1-Dichloroethene	ug/l	7	104	96	99	86
	Chloroform	ug/l	80	< 1	< 0.8	< 0.8	< 0.8

P-17D (Screened 50.1 - 60.1 feet BGS)							
Analytical				June 2004	Dec. 2005	May 2006	Aug. 2006
Group	Constituent	Units	MCL	Result	Result	Result	Result
VOCs	1,1,1-Trichloroethane	ug/l	200	< 1	< 0.8	< 0.8	< 0.8
	1,1-Dichloroethane	ug/l	NS	2.1	2 J	2 J	2 J
	1,1-Dichloroethene	ug/l	7	163	120	130	110
	Chloroform	ug/l	80	< 1	< 0.8	< 0.8	< 0.8

P-18D (Screened 35 - 45 feet BGS)							
Analytical				June 2004	Dec. 2005	May 2006	Aug. 2006
Group	Constituent	Units	MCL	Result	Result	Result	Result
VOCs	1,1,1-Trichloroethane	ug/l	200	1.2	1 J	< 0.8	1 J
	1,1-Dichloroethane	ug/l	NS	2.1	1 J	2 J	2 J
	1,1-Dichloroethene	ug/l	7	64.6	38	53	53
	Chloroform	ug/l	80	0.9 J	4 J	3 J	2 J

P-19D (Screened 25.7 - 35.7 feet BGS)							
Analytical				June 2004	Dec. 2005	May 2006	Aug. 2006
Group	Constituent	Units	MCL	Result	Result	Result	Result
VOCs	1,1,1-Trichloroethane	ug/l	200	1.1	< 0.8	< 0.8	1 J
	1,1-Dichloroethane	ug/l	NS	0.7 J	< 1	< 1	< 1
	1,1-Dichloroethene	ug/l	7	14.5	5	7	8
	Chloroform	ug/l	80	2.2	2 J	2 J	1 J

P-20D (Screened 40 - 50 feet BGS)					
Analytical				May 2006	Aug. 2006
Group	Constituent	Units	MCL	Result	Result
VOCs	1,1,1-Trichloroethane	ug/l	200	< 0.8	< 0.8
	1,1-Dichloroethane	ug/l	NS	1 J	1 J
	1,1-Dichloroethene	ug/l	7	37	44
	Chloroform	ug/l	80	1 J	1 J

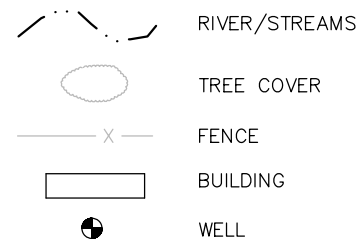
P-18S (Screened 6.4 - 16.4 feet BGS)							
Analytical				June 2004	Dec. 2005	May 2006	Aug. 2006
Group	Constituent	Units	MCL	Result	Result	Result	Result
VOCs	1,1,1-Trichloroethane	ug/l	200	1.6	1 J	1 J	0.9 J
	1,1-Dichloroethane	ug/l	NS	2.3	1 J	2 J	< 1
	1,1-Dichloroethene	ug/l	7	63.8	26	39	20
	Chloroform	ug/l	80	1.1 J	2 J	1 J	< 0.8

P-16S (Screened 16.2 - 26.2 feet BGS)							
Analytical				June 2004	Dec. 2005	May 2006	Aug. 2006
Group	Constituent	Units	MCL	Result	Result	Result	Result
VOCs	1,1,1-Trichloroethane	ug/l	200	0.4 J	< 0.8	< 0.8	< 0.8
	1,1-Dichloroethane	ug/l	NS	5.3	4 J	3 J	2 J
	1,1-Dichloroethene	ug/l	7	13.2	17	11	9
	Chloroform	ug/l	80	0.2 J	< 0.8	< 0.8	< 0.8

P-19S (Screened 5.6 - 15.6 feet BGS)							
Analytical				June 2004	Dec. 2005	May 2006	Aug. 2006
Group	Constituent	Units	MCL	Result	Result	Result	Result
VOCs	1,1,1-Trichloroethane	ug/l	200	0.4 J	< 0.8	< 0.8	< 0.8
	1,1-Dichloroethane	ug/l	NS	0.3 J	< 1	< 1	< 1
	1,1-Dichloroethene	ug/l	7	5.4	2 J	1 J	< 0.8
	Chloroform	ug/l	80	0.9 J	< 0.8	2 J	< 0.8

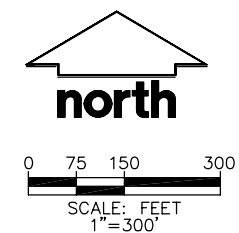
P-20S (Screened 12.1 - 22.1 feet BGS)					
Analytical				May 2006	Aug. 2006
Group	Constituent	Units	MCL	Result	Result
VOCs	1,1,1-Trichloroethane	ug/l	200	< 0.8	< 0.8
	1,1-Dichloroethane	ug/l	NS	< 1	< 1
	1,1-Dichloroethene	ug/l	7	< 0.8	< 0.8
	Chloroform	ug/l	80	1 J	< 0.8

LEGEND



NOTES:

1. CONCENTRATIONS IN MICROGRAMS PER LITER ($\mu\text{g/L}$).
2. MCL = USEPA MAXIMUM CONTAMINANT LEVEL.
3. BOLD CONCENTRATION INDICATES EXCEEDANCE OF MCL.
4. 2005–2006 DATA COLLECTED BY MWH, INC; 2004 DATA COLLECTED BY EARTH TECH, INC.
5. BGS – BELOW GROUND SURFACE.



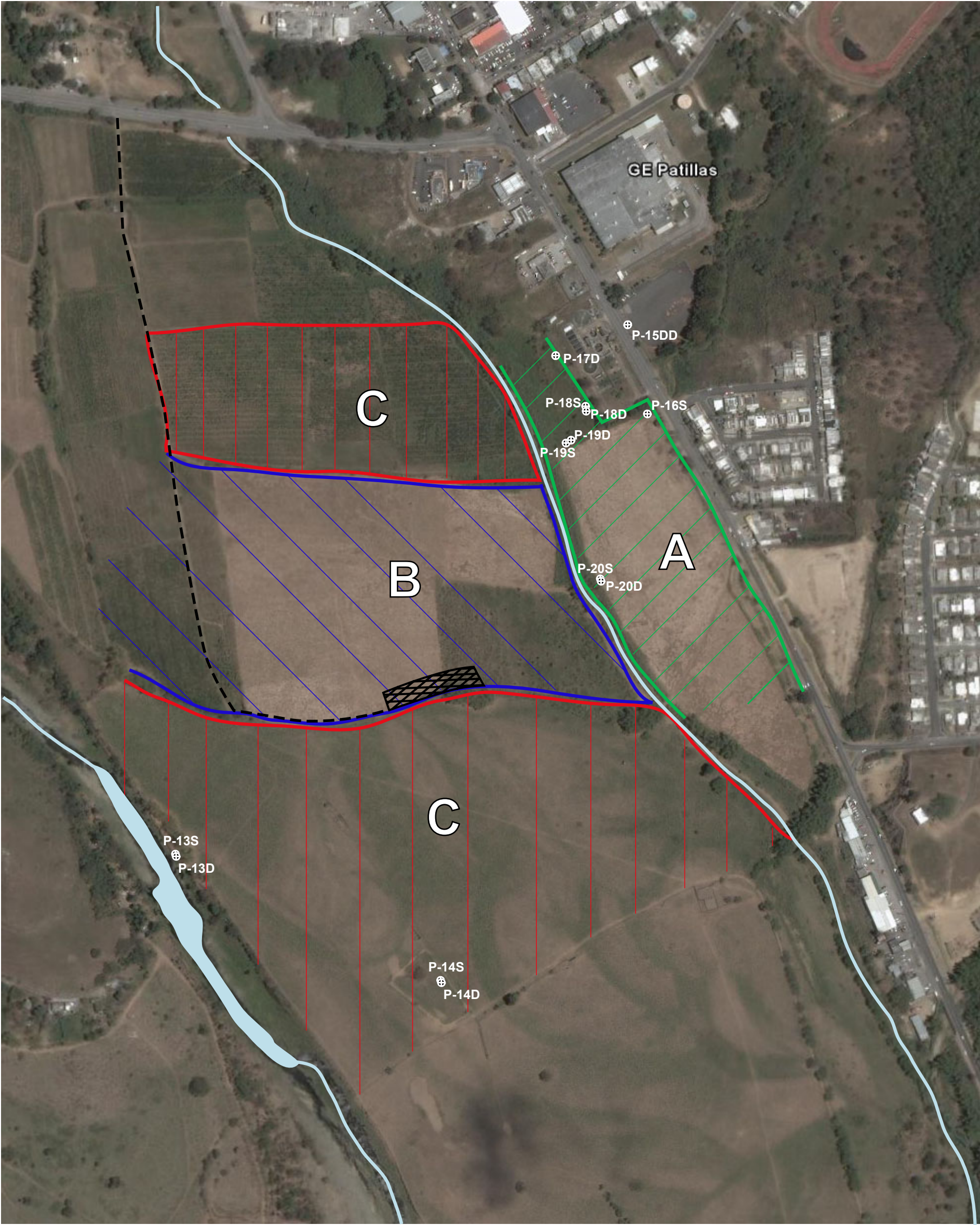
CARIBE GENERAL ELECTRIC
PATILLAS, PUERTO RICO

VOC ANALYTICAL RESULTS POSTING MAP

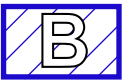


ATTACHMENT 2

ATTACHMENT 3
PROPOSED WELL LOCATION MAP



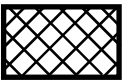
Available Access (owned/leased by Sn. Cora)



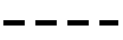
Limited Access (owned/leased by Sn. Cora)



No Current Access (owned by Sn. Cobian)



Potential New Well Location



Potential Access Route

Note: Area boundaries are approximate, and based on information provided by Earth Tech, Inc. and current understanding by MWH.



CARIBE GENERAL ELECTRIC
PATILLAS, PUERTO RICO

DRAFT
OFF-SITE PROPERTY ACCESS MAP



MWH

FIGURE 1

ATTACHMENT 4
COPY OF EMAIL REQUESTING GE TO
PURSUE ACCESS FOR ADDITIONAL WELLS

Goldstein, Michael (GE Indust, ConsInd)

From: Goldstein, Michael (GE Indust, ConsInd)
Sent: Thursday, March 16, 2006 6:28 PM
To: 'Tjho.Sin-Kie@epamail.epa.gov'
Cc: 'Bill Bowen (E-mail)'; Miller, Donald (GE, Corporate, non-ge); Miranda, Roberto (GE Indust, ConsInd)
Subject: RE: Alternative well location needed to keep on schedule



Figure
Alternative location Sin-kie,

Pursuant to our discussion, GE will install the new well cluster in the box labeled "alternative area proposed for well location" as close to the "X" where the hypothetical flow line crosses the 20 ft msl contour. This new well will provide additional data about groundwater quality and flow direction.

In response to your question, we suggested this alternative location in the interest of time and to support your desired goal to have the data necessary to make an EI 750 determination this Fall. The reason for proposing the Alternate Well location was that the construction of wells in the original box across the creek requires additional time to: 1) obtain the necessary permit from the US Corps of Engineers to support one route to the wells; or 2) constructing a rather long temporary road to access the location from the north. In the end, neither route would have supported the schedule we discussed, so we have proposed this alternative location.

I want to further clarify that this was not an access-related issue. We have been able to secure access to the area in the box on the other side of the creek (labeled "well location agreed between GE and USEPA") and will work to obtain access to other areas to support site investigations in the future as necessary.

Thank you for your understanding. We will keep you posted on our progress.

Mike

-----Original Message-----

From: Tjho.Sin-Kie@epamail.epa.gov [mailto:Tjho.Sin-Kie@epamail.epa.gov]
Sent: Thursday, March 16, 2006 11:00 AM
To: Goldstein, Michael (GE Indust, ConsInd)
Subject: Re: Alternative well location needed to keep on schedule

Mike:

The alternate location is not the best one I like to see, but knowing the general direction of the flow, it is probably within the range. Please locate the well near the top of the alternate location box you proposed on the map. In the mean time, GE needs to continue to try to gain access to the the property, as down the road GE would need to access to those propoerties. Please keep EPA informed of your efforts in that regard and cc us on all correspondence, so when you are unsuccessful, EPA will involve.

Sin-Kie

"Goldstein,
Michael (GE
Indust,
ConsInd)" To
Sin-Kie Tjho/R2/USEPA/US@EPA,
<Goldstein.Mike@ SKTjho@optonline.net
ge.com> cc

03/15/2006 08:29 Subject
AM Alternative well location needed
to keep on schedule

Sin-Kie,

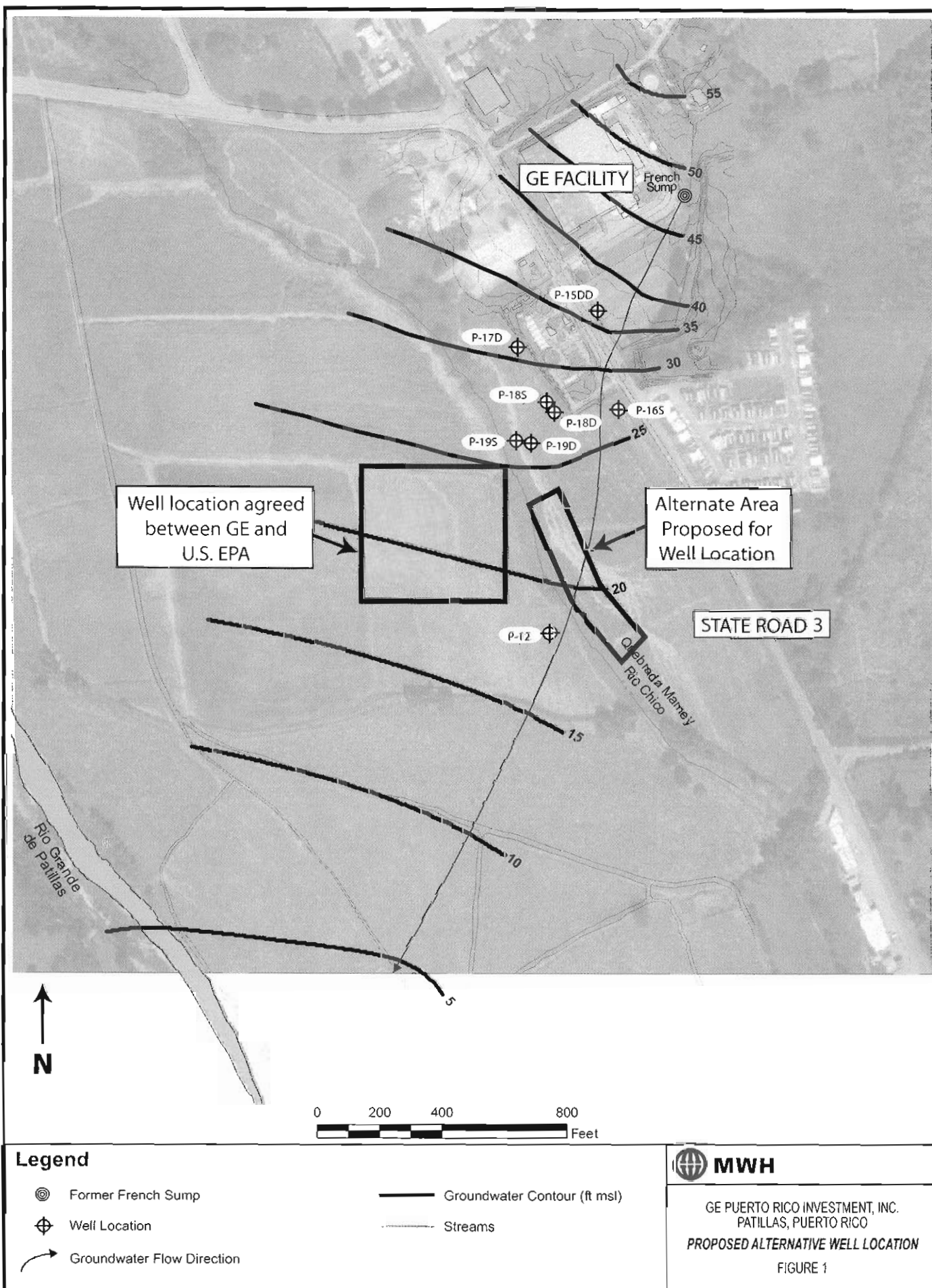
We are encountering some issues trying to get our new well cluster located across the river in the box we discussed. I have met with my team and we feel that the alternate location identified on the attached map would be a better alternative approach that would keep us on current schedule of well installation and sampling in March so that another round can be collected in June. If we do not select this location, we will not be able to get the wells in this quarter and resampled again this summer so that you can have the results before the fall. Can you confirm that you are OK with this alternative approach by e-mail or call me so that we can discuss? If you need to reach me, you may need to call my cell phone 502-514-1997 as I am in lots of meetings and traveling part of this week.

Mike

<<Figure 1_Alternative location_3_14_06_.pdf>>

Michael Goldstein
Manager, Global Remediation and EHS Property Transaction Due Diligence
General Electric Company
Consumer and Industrial Business
Appliance Park, AP26-100
(502) 452-3468
DC# 334-3468

(See attached file: Figure 1_Alternative location_3_14_06_.pdf)



Based on Figure 3-12, EarthTech SRFI, 2005.

Goldstein, Michael (GE Indust, ConsInd)

E-Mail Exchange #1
(re) 2006 Scope and Approach

From: Tjho.Sin-Kie@epamail.epa.gov
Sent: Monday, February 13, 2006 3:30 PM
To: Goldstein, Michael (GE Indust, ConsInd)
Cc: Carpenter.Dale@epamail.epa.gov
Subject: Re: Patillas path forward



Proposed new well
location.pdf...

Mike:

As outlined in the September 2005 letter, GE would perform additional groundwater sampling activities necessary to delineate the extent of plume outside the GE facility boundary. In December, GE performed the round #2 sampling at the 6 off-site wells and 1 well inside the facility boundary. Consistent with the agreement reached in the September 2005 letter, GE now proposes to install a new down-gradient well cluster in early March, 2006. Based upon the discussions we recently held, EPA hereby concurs with the proposed general location for the proposed new well cluster, which is intended basically as the replacement for the old down-gradient well P-12 which could not found and presumably totally damaged. In addition to the installation and sampling of this new down-gradient well cluster, GE would continue to perform round #3 sampling (scheduled for March) and round #4 sampling (scheduled for June) at other off-site wells. By September 2006, I hope we would have enough data in hand to make the EI-750 determination.

Glad to hear that Mike Pelletier is still around to provide the necessary support that the new team would need.

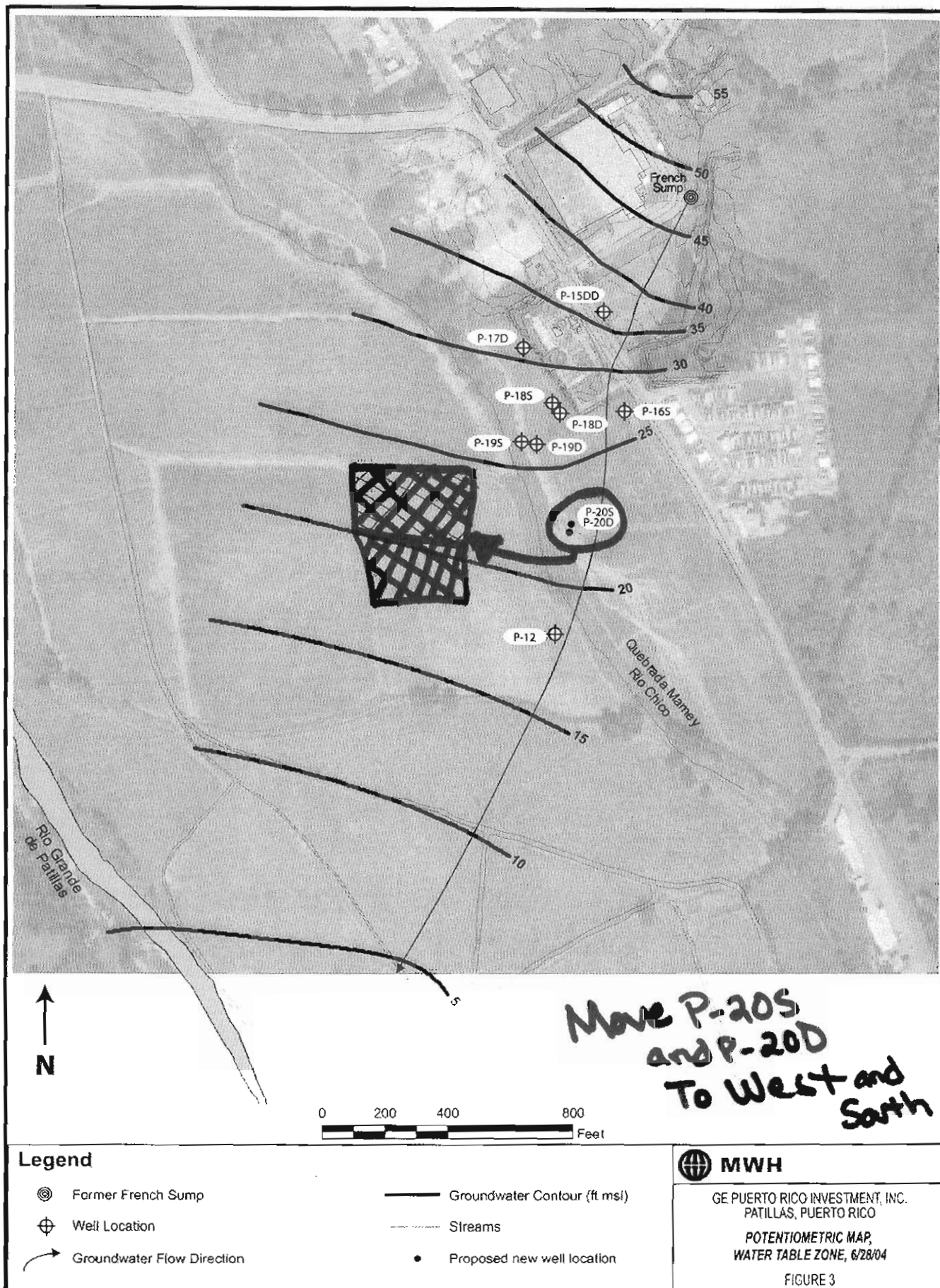
Sin-Kie

"Goldstein,
Michael (GE
Consumer &
Industrial)" To
<Goldstein.Mike@ge.com> Sin-Kie Tjho/R2/USEPA/US@EPA
cc

Subject
02/12/2006 09:01 PM Patillas path forward

> Sin-Kie,
>
> If you reply affirmatively to the proposed new well cluster location
indicated on attached map, I will plan to do the following:
>
> 1) Install new downgradient well cluster (P-20S and P-20D) in March
2006
> 2) Sample the new downgradient well cluster (P-20S and P-20D) in March
2006 (this will be round #1)
> 3) Sample 7 other wells (6 off-site wells: P-16S, P-17D, P-18S, P-18D,
P-19S, and P-19D; and 1 deep on-site well: P-15DD) in March 2006 (this
will be round #3)
> 4) Sample the new downgradient well cluster (P-20S and P-20D) in June
2006 (this will be round #2)
> 5) Sample 7 other wells again in June 2006 (this will be round #4)
> 6) Submit data and work with you to support EI-750 determination in
September 2006 timeframe

> We will status you on our progress throughout the next couple of
months and let you know if anything deviates from this general gameplan.
Please let me know if you need additional data or information and do not
hesitate to call me at any time.
>
> Mike
>
> _____
> Mike Goldstein
> Global Remediation Manager
> GE Consumer and Industrial
> Appliance Park
> AP26-100
> Louisville, KY 40225
> Phone: 502-452-3468
> Dialcomm: 8*334-3468
> Fax: 502-452-0441
> goldstein.mike@ge.com
>
>
>
> > <<Proposed new well location.pdf>>
(See attached file: Proposed new well location.pdf)



Based on Figure 3-12, EarthTech SRFI, 2005.

Page 6 of 6

ATTACHMENT 5

ACCESS LETTER SIGNED BY MR. CORA ON NOVEMBER 30, 2006



Caribe GE

Caribe GE

El Mundo Office Building
Suite 201
383 F.D. Roosevelt Ave.
Hato Rey PR 00918
Tel. 787-625-2325

26 de octubre de 2006

Mr. Secundino Cora
P.O. Box 1216
Patillas, PR 00723

Re: Petición de Acceso a su Propiedad

Estimado Sr. Cora,

El propósito de esta carta es para pedirle acceso á su propiedad para instalar nuevos pozos de monitoreo para agua subterránea, como parte de la investigación que lleva a cabo, "United States Environmental Protection Agency" (USEPA por su siglas en ingles). La propiedad esta situada al lado de la facilidad de GE Caribe en Patillas, Puerto Rico. Le adjuntado el mapa de la zona propuesta, para los pozos, a la cual nosotros estamos pidiendo acceso.

A cambio del acceso, GE Consumer and Industrial (GE), se compromete a darle copia de los resultados, del muestreo que se llevara a cabo en la propiedad, una vez que los resultados hayan sido examinados y aprobados por la USEPA.

Por favor conteste aprobando o negando el acceso a la propiedad, para instalar los pozos de monitoreo.

Muchas gracias por su consideración en este asunto. En caso de cualquier pregunta por favor no dude en contactarme en el siguiente numero 787-525-4968.

Atentamente,

Roberto Miranda
GE Consumer & Industrial

Autorizo acceso á GE a instalar y hacer muestreos en los nuevos pozos en mi propiedad.

Secundino Cora

30 de noviembre-06

Fecha

No autorizo acceso á GE a instalar y hacer muestreos en los nuevos pozos en mi propiedad.

Secundino Cora

Fecha

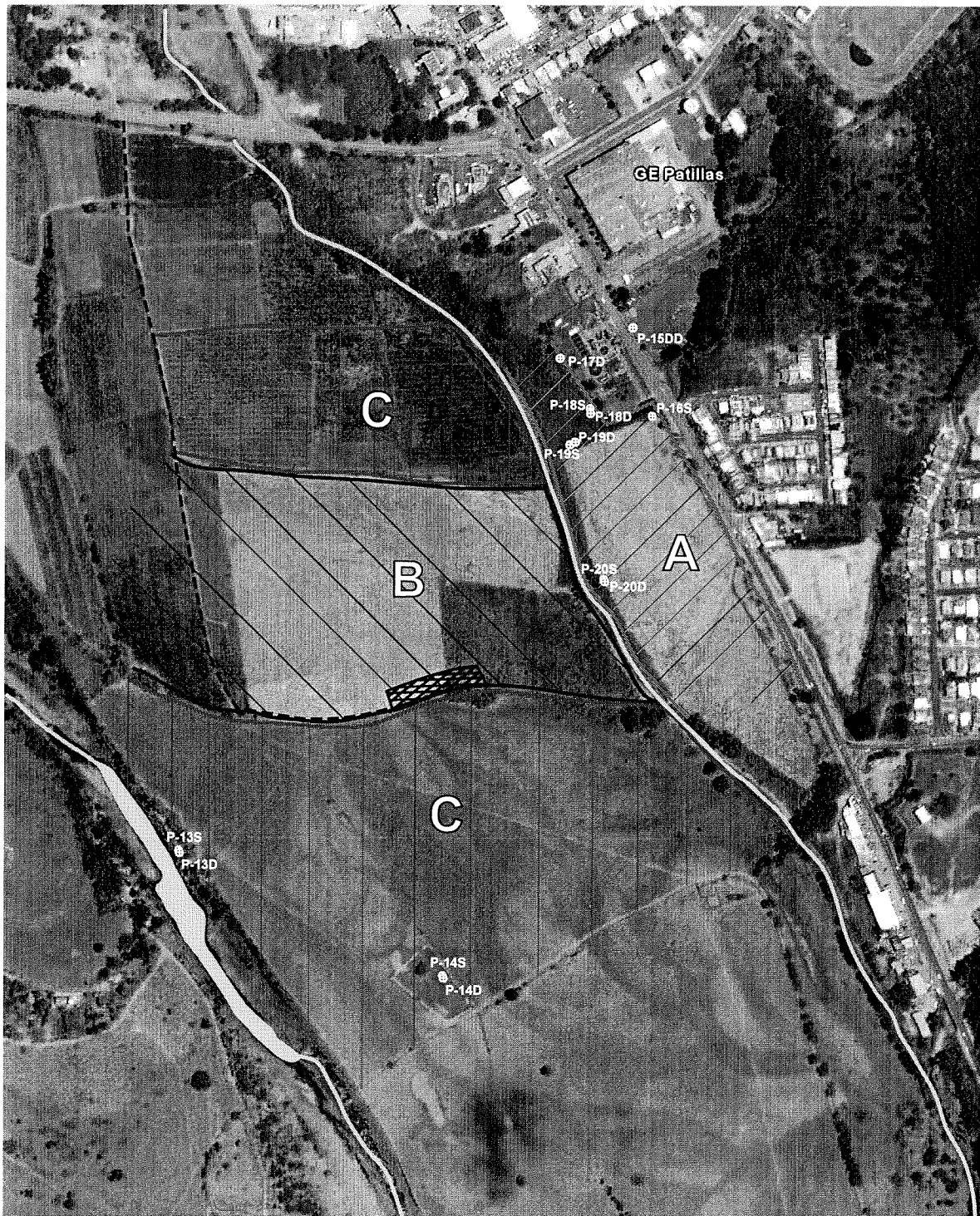
Representante legal de los dueños, según
nos informa el Sr. Secundino Cora es
el Sr. Noel Matei.

Dirrección Física

Barrio Cacao Bajo

carr # 3

Interior



Available Access (owned/leased by Sn. Cora)



Limited Access (owned/leased by Sn. Cora)



No Current Access (owned by Sn. Cobian)



Potential New Well Location



Potential Access Route

Note: Area boundaries are approximate, and based on information provided by Earth Tech, Inc. and current understanding by MWH.



CARIBE GENERAL ELECTRIC
PATILLAS, PUERTO RICO

DRAFT
OFF-SITE PROPERTY ACCESS MAP



MWH

FIGURE 1