

Vieques
REPT



January 10, 2004

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RECEIVED
JAN 11 2004
GENERAL ELECTRIC CO.
CEP/RECO

Mr. Jean Robert Jean
Environmental Protection Agency - Region 2
290 Broadway
New York, New York 10007-1866

Re: Caribe General Electric Products - Summary of site closure issues, Vieques,
Puerto Rico

Dear Mr. Jean:

On behalf of Caribe General Electric Products (CGE), thank you for your October 22, 2004, letter summarizing the Environmental Protection Agency's (EPA's) review of the Closure Report for the CGE facility in Vieques, Puerto Rico. CGE views this as a significant milestone towards resolving several lingering site closure issues and focusing future site activities on the continuing groundwater investigation.

We are writing to summarize our understanding of the closure status and post-closure care requirements, if any, for each of the referenced waste management units. First, in your letter, you reference the need for CGE to submit a Closure Certification as stipulated in 40 CFR 265.115. Please note that the required Closure Certification, by Carlos A. Ortiz Suarez, P.E. (Geotec Subsoil Exploration and Materials Company) was included within the document titled Addendum to Closure Report (Canonie, September 1991; copy attached). We assume that the attached Closure Certification satisfies this requirement.

Second, your letter indicates that CGE is subject to comply with the closure/post-closure care requirements as specified in 40 CFR Part 265.117 through 120. We have reviewed these requirements for each unit, and as set forth in the following sections, CGE believes that there are no applicable post-closure requirements for the referenced waste management units because the closure of each unit has met the closure performance standard and has been approved by EPA. Given the long regulatory history of this site, we are summarizing below our understanding of the classification, closure status, post-closure requirements, if any, and overall regulatory status of the former waste management units at the facility. Based on this evaluation, CGE believes that there is no continuing regulatory requirement for post-closure monitoring. There does, however, remain the need for further investigation, related to TCE in groundwater near monitoring well C-4, that CGE will continue to address. Therefore, CGE proposes to update the

current groundwater monitoring program to focus future monitoring on the continuing investigation of TCE in groundwater near monitoring well C-4. CGE will submit, by separate letter, an updated groundwater monitoring program that will include additional well installation and continued monitoring for VOCs and monitored natural attenuation parameters.

CONTAINER STORAGE AREA

Regulatory Classification

The Container Storage Area, located on the south side of the manufacturing plant, was used to store hazardous wastes from 1983 to 1988. Per 40 CFR Section 265.110, this hazardous waste management unit is subject to the closure requirements in Sections 265.111 to 265.115.

Closure Activities/Status

The Closure Plan (Canonie, October 1989) indicates that the Container Storage Area was cleaned in accordance with a plan approved by EPA and the Environmental Quality Board of Puerto Rico (EQB), as certified in June 1989. EPA and EQB determined that closure activities met all requirements specified in the approved closure plan and accepted closure certification in November 1990 (letter from F. del Valle [EQB] to L. Dávila [CGE], November 3, 1990). As documented in the October 22, 2004, letter, EPA has confirmed that CGE has met the closure performance standard and the requirements of the approved closure plan (per 40 CFR Sections 265.111 and 265.112) for several former hazardous waste management units, including the Container Storage Area.

Post-Closure Requirements

There are no post-closure requirements for the Container Storage Area. Per 40 CFR 265.110(b), the post-closure regulations in 40 CFR Sections 265.116 to 265.120 do not apply.

Unit Regulatory Status

No further activities are required for the Container Storage Area because closure has been approved and there are no applicable post-closure requirements.

INACTIVE SUBSURFACE LEACH FIELD SYSTEM (LEACH FIELD)

Regulatory Classification

The Inactive Subsurface Leach Field System (Leach Field) was identified as a surface impoundment in the CGE Part A permit application. Per 40 CFR Section 265.110, this hazardous waste management unit is subject to the closure requirements in Sections 265.111 to 265.115.

Closure Activities/Status

The Leach Field was clean closed in April 1991 by completing the following activities: (1) removal and disposal of all Leach Field piping and 86 tons of soil, and (2) cleaning (i.e., decontamination) and in-place closure of the inaccessible, non-perforated header pipe. Confirmatory soil sampling for VOCs and inorganics indicated low-levels of some inorganics, which were below applicable EPA health-based criteria (Closure Report, Canonie, June 1991). EPA has determined, as documented in the October 22, 2004, letter, that CGE has met the closure performance standard and the requirements of the approved closure plan (per 40 CFR Sections 265.111 and 265.112) for several former hazardous waste management units, including the Leach Field.

Post-Closure Requirements

The Leach Field does not require post-closure care because it has been clean closed per the specifications of 40 CFR 265.228(a)(1). 40 CFR Section 265.110(b)(2) indicates that the post-closure care regulations in Sections 265.116 through 265.120 apply to surface impoundments when the owner or operator intends to remove the wastes at closure ***to the extent that these sections are made applicable to such facilities in §265.228(a)(2)*** (i.e., if the unit is not clean closed and all or some of the wastes are left in place).

Unit Regulatory Status

No further action is required for the Leach Field because closure has been approved and there are no applicable post-closure requirements. Post-closure monitoring was initially specified in the Closure Plan (Canonie, October 1989) and Closure Report (Canonie, June 1991) to include a minimum of two years of groundwater monitoring if there were no increasing contaminant concentration trends. This monitoring focused on this unit and the Sediment Tank. This monitoring has continued to be conducted semi-annually, as modified by the additional monitoring specified in the Closure Plan Amendment – Revision No. 1 (Canonie, February 1994) and subsequent correspondence with EPA regarding new monitoring well installation.

Based on the closure approval for this unit, CGE proposes to terminate the current post-closure monitoring program in favor of an updated monitoring program focused on the continuing investigation of TCE in groundwater near monitoring well C-4.

SEDIMENT TANK

Regulatory Classification

The Sediment Tank was installed as part of the Leach Field system in 1979 to intercept solids entering the Leach Field and minimize system plugging. After Leach Field use was discontinued in October 1983, the tank was used as a central collection point for drumming hazardous wastes until 1985, when it was decommissioned and filled with sand. The Sediment Tank was identified as a tank in the CGE Part A permit application. Per 40 CFR Section 265.110, this hazardous waste management unit is subject to the closure requirements in Sections 265.111 to 265.115.

Closure Activities/Status

The Sediment Tank closure completed in April 1991 consisted of removal of the tank and all material in the tank, and proper disposal of 11 tons of soil and debris. The inlet pipe to the tank was cut, cleaned, and permanently plugged with concrete. Post-excavation confirmatory soil sampling indicated low levels of some inorganics, which were below applicable EPA health-based criteria (Closure Report, Canonie, June 1991). EPA has determined, as documented in the October 22, 2004, letter, that CGE has met the closure performance standard and the requirements of the approved closure plan (per 40 CFR Sections 265.111 and 265.112) for several hazardous waste management units, including the Sediment Tank.

Post-Closure Requirements

The Sediment Tank does not require post-closure care because the tank and associated contamination has been removed per 40 CFR Section 265.197(a). 40 CFR Section 265.110(b)(3) indicates that the post-closure care regulations in Sections 265.116 through 265.120 apply to tank systems that are not clean closed and all or some of the wastes are left in place, and are required under §265.197 to meet landfill post-closure requirements.

Unit Regulatory Status

No further activities are required for the Sediment Tank because closure has been approved and there are no applicable post-closure requirements. CGE proposes to terminate the current post-closure monitoring program in favor of a revised

monitoring program focused on the continuing investigation of TCE in groundwater near monitoring well C-4.

SEPTIC TANK SYSTEM

Regulatory Classification

The Septic Tank System handled both sanitary and process waste discharges from 1969 to 1971. In 1971, the process wastewater was separated from the sanitary system and discharged to the Leach Field system. The Septic Tank System is not considered a RCRA hazardous waste management unit because it never handled RCRA waste (i.e., post-1980 waste).

Closure Activities/Status

Although the Septic Tank System was not considered a RCRA hazardous waste management unit, CGE specified that the closure of the septic system would occur when it was no longer needed for plant sanitary waste disposal (Closure Plan, Canonic, October 1989). Soil sample analytical results collected during 1989 indicate that no contaminants exceeded health-based levels. The Septic Tank System was subsequently decommissioned in September 1993 when the plant was connected to the new Vieques municipal wastewater treatment plant (Closure Plan Amendment – Revision No. 1, Canonic, February 1994).

Post-Closure Requirements

As documented in the October 22, 2004, letter, EPA has confirmed that CGE has met the closure performance standard and the requirements of the approved closure plan (per 40 CFR Sections 265.111 and 265.112) for several former hazardous waste management units and the Septic Tank System. Therefore, there are no post-closure requirements.

Unit Regulatory Status

No further activities are required for the Septic Tank System because closure has been approved and there are no applicable post-closure requirements.

BRIGHT DIP AREA

Regulatory Classification

As described in the Closure Plan (Canonie, October 1989), a bright dipping process utilized acids to descale and control tarnishing of electrical parts from 1972 to 1986 and generated hazardous waste classified as D002. From 1972 to 1983, the rinseates were discharged to the Leach Field. After the decommissioning of the Leach Field in 1983, the rinseates were collected in the Sediment Tank and subsequently pumped into drums. During 1985, generated wastes were temporarily accumulated in the Bright Dip Area in a 55-gallon plastic drum set into the ground. The wastes were then pumped into drums for off-site disposal. Although not historically described in the closure documents as such, a temporary management area for small amounts of wastes located near the waste generating process is typically considered a satellite accumulation area (SAA). The storage standards that apply to SAAs are reduced in comparison to a container storage area; for example, closure requirements do not apply to an SAA.

Closure Activities/Status

The Bright Dip Area closure occurred in 1991 and consisted of removal and proper disposal of 13 tons of soil. Post-closure confirmatory soil sampling indicated low levels of some inorganics, however, all levels were below applicable EPA health-based criteria (Closure Report, Canonie, June 1991). EPA has determined, as documented in the October 22, 2004, letter, that CGE has met the closure performance standard and the requirements of the approved closure plan (per 40 CFR Sections 265.111 and 265.112) for several hazardous waste management units, including the Bright Dip Area.

Post-Closure Requirements

There are no post-closure requirements for the Bright Dip Area. Per 40 CFR 265.110 (b), the post-closure regulations in 40 CFR Sections 265.116 to 265.120 do not apply.

Unit Regulatory Status

No further activities are required for the Bright Dip Area because closure has been approved and there are no applicable post-closure requirements.

In summary, CGE understands that all outstanding site closure issues have been resolved. CGE will submit, by separate letter, an updated groundwater monitoring program that will include additional well installation and continued monitoring for VOCs and monitored natural attenuation parameters. Please advise us of any

further requirements beyond the submittal of the updated site groundwater monitoring program.

Very Truly Yours,



Robert B. Warren, Jr.
Project Scientist



David A. Yoxtheimer
Project Manager/Hydrogeologist

Enclosure

cc: Osvaldo I. Fantauzzi, EQB
Francisco Lopez, PRIDCO
Roberto Miranda, GE IndSys
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RIO PIEDRAS, PUERTO RICO

CERTIFICATION OF CLOSURE REPORT

AUGUST 24, 1991

TO WHOM IT MAY CONCERN:

I, Carlos A. Ortiz Suárez, P.E. License No. 5305, have reviewed The Closure Report prepared by Canonie Environmental for the Caribe - General Products, Inc., plant at Vieques, Puerto Rico and found to comply with generally accepted professional principles and practices.

Very Truly Yours,

Carlos A. Ortiz Suárez, P.E.
Chairman

CO/mj