



Superfund Records Center
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GE
159 Plastics Avenue
Pittsfield, MA 01201
USA



SDMS DocID

252360

Transmitted Via Federal Express

August 22, 2006

Susan C. Svirsky, Project Manager
United States Environmental Protection Agency
c/o Weston Solutions
10 Lyman Street
Pittsfield, MA 01201

**Re: Proposed Silver Lake Bank Soil Removal
GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts
Silver Lake Area (GECD600)**

Dear Ms. Svirsky:

As described in the June 2006 *Pilot Study Work Plan for Silver Lake Sediments* (Work Plan), which was conditionally approved by the Environmental Protection Agency (EPA), on July 18, 2006, the General Electric Company (GE) is preparing to implement a sediment capping pilot study at the eastern end of Silver Lake. That study is being performed pursuant to a Consent Decree (CD) executed in 1999 by GE, EPA, the Massachusetts Department of Environmental Protection (MDEP), and several other government agencies and entered by the United States District Court for the District of Massachusetts on October 27, 2000, concerning the GE-Pittsfield/Housatonic River Site (the Site). The capping pilot study will include construction of a shoreline armoring system to mitigate the potential for erosion of the cap materials. Recent assessment of the soil data collected in the pilot study area indicate that some bank soil removal will be necessary to meet applicable performance standards associated with the banks of Silver Lake. To avoid removal of soil after the construction of the cap in the pilot study area, GE proposes in this letter to undertake, in advance of a forthcoming Conceptual Remedial Design/Removal Action Work Plan (Conceptual Work Plan) for Silver Lake Bank Soils, the expedited removal of certain Silver Lake bank soils in conjunction with the implementation of the pilot study.

The proposed removal area is located within a Silver Lake property labeled Recreational Area 4, and is adjacent to the proposed pilot study location (Figure 1). Over the course of soil investigations performed by GE and EPA beginning in 1995, 35 soil samples have been collected from 16 locations within Recreational Area 4 for analysis of PCBs, and 10 soil samples have been collected from 6 locations within this area for analysis of other constituents listed in Appendix IX of 40 CFR Part 264, plus three additional constituents (benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine) (Appendix IX+3). GE has utilized these data to perform soil characterizations within Recreational Area 4, and to perform preliminary RD/RA evaluations. The results of these preliminary activities indicate that soil sample location RA-4-SB-8, as shown on Figure 1, has elevated PCB levels in the 0- to 1-foot and 1- to 3-foot depth increments and that if the polygons containing this soil sample location are removed to a depth of three feet, the portion of Recreational Area 4 affected by the pilot study would not require further remediation to satisfy the applicable Performance Standards as set forth in the SOW. Removal of bank soils to a depth of 3 feet (as measured normal to the bank surface) down to the depth of the mean water surface elevation would occur over the area depicted in Figure 1, generating approximately 200 cubic yards of bank soil. GE would characterize the removed soil as necessary for off-site disposal and then transport and dispose of that soil at an appropriately permitted facility.

The transportation of any materials to be disposed of at the Hill 78 On-Plant Consolidation Area (OPCA), or to be stockpiled at the Site, will occur "on-site" within the meaning of Paragraph 9.a of the CD, and thus will be subject to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) on-site permitting exemption referenced in Paragraph 9.a of the CD, and will take place under bills of lading. Materials being disposed of off-site will be shipped using hazardous waste manifests. Over-the-road transport of materials will be performed by licensed haulers in accordance with appropriate local, state, and federal regulations. Dump trailers leaving the work area will be lined to prevent spillage during transportation (as necessary), manifested, and placarded in accordance with federal and state requirements. The Remediation Contractor will be required to implement the following procedures for the transport of excavated materials from the Silver Lake Area to the above-referenced disposal facilities:

- Employ qualified personnel trained per U.S. Department of Transportation (DOT) requirements for handling and shipping hazardous materials, with such training to include general safety, emergency response, exposure protection, accident prevention, preparation of shipping papers, and securing loads;
- Employ drivers that have a Commercial Driver's License (CDL) with a Hazardous Materials Endorsement;
- Utilize trucks that are DOT-inspected;
- Include in its HASP, Operations Plan, and Contingency Plan detailed provisions for responding to transportation emergencies such as spills, releases, or other incidents;
- Maintain records of the number of loads of materials sent to the off-site disposal facilities on a daily basis; and
- Confirm that the materials are suitable for transport (i.e., no free liquids).

The transport of excavated materials from the Silver Lake Area to the appropriate disposal facility will be conducted in accordance with the following guidelines:

- After a safety check of the truck, the truck bed will be lined with polyethylene. Excavated soil will be placed in the truck and the load will be covered.
- An appropriate hazardous waste manifest or bill of lading will be prepared and signed by the truck driver and the appropriate disposal facility.

Full details of the RD/RA evaluations performed for Recreational Area 4 soils will be included in the Conceptual Work Plan anticipated to be submitted in the near future, following the completion of RD/RA evaluation activities for the entire Silver Lake Area. By this letter, GE is not seeking EPA's concurrence in GE's RD/RA evaluations for Recreational Area 4, but EPA's approval to proceed at the present time with the soil removal work proposed herein.

Following EPA approval, GE will perform the proposed bank soil removal as part of the implementation of the pilot study in mid-September, and will submit a brief report documenting the performance of such activities.

Please contact me with questions or comments.

Sincerely,

Andrew T. Silfer/dmn

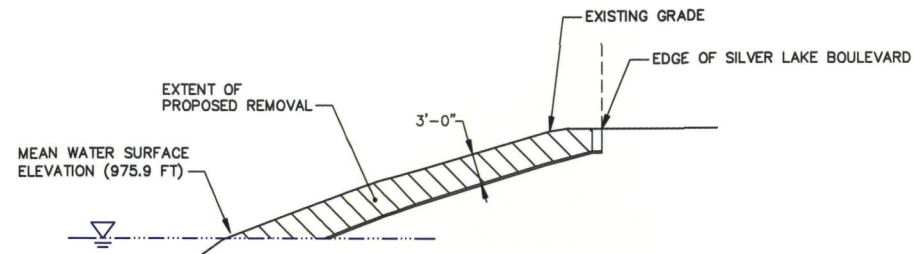
Andrew T. Silfer, P.E.
GE Project Coordinator

ATS/dmn

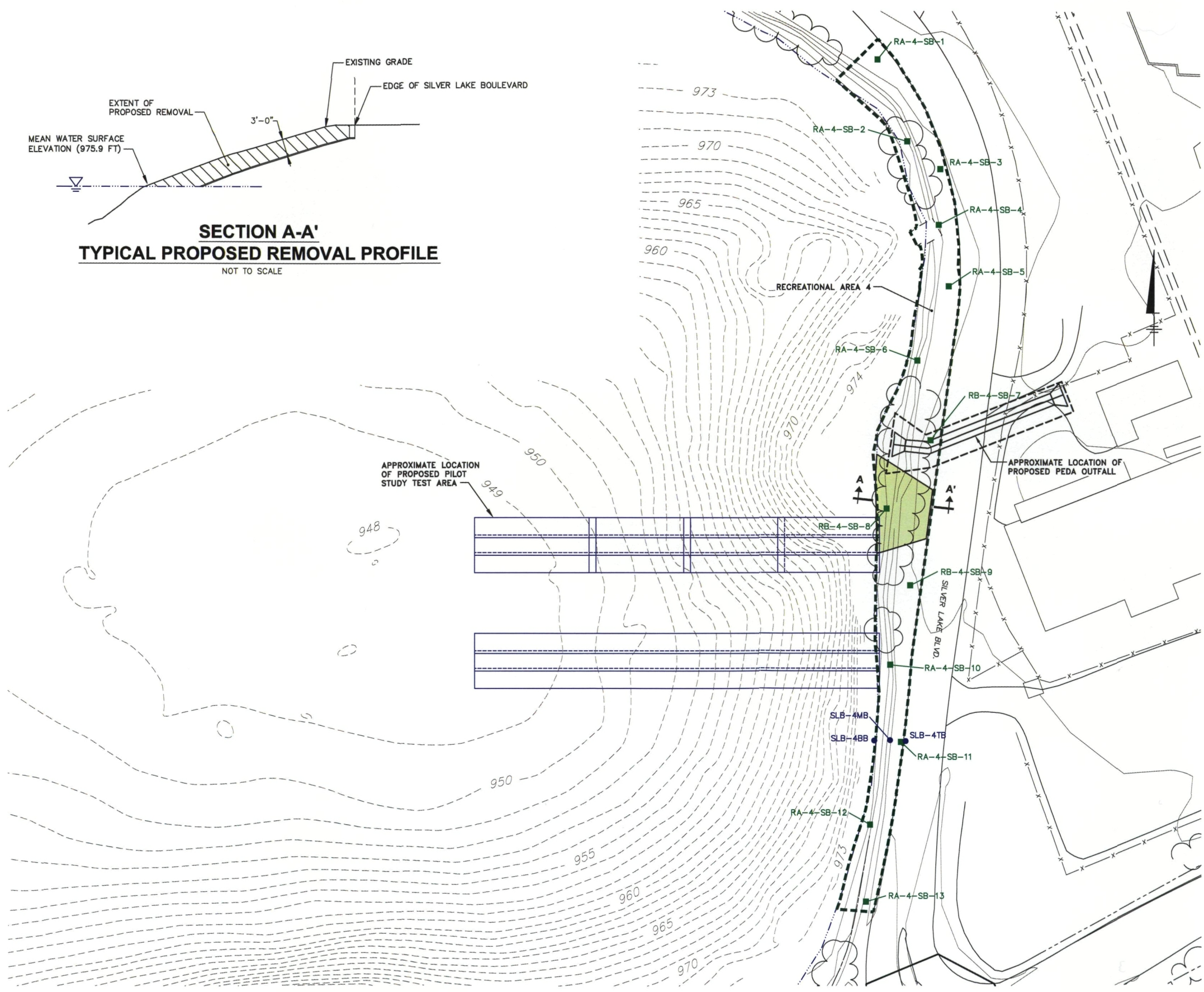
Enclosure

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Public Information Repositories
GE Internal Repositories

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SECTION A-A'
TYPICAL PROPOSED REMOVAL PROFILE
 NOT TO SCALE



- LEGEND:**
- EDGE OF WATER
 - ~ VEGETATION
 - PAVED ROADWAY
 - x-x- FENCELINE
 - ELEVATION CONTOUR
 - 970--- SILVER LAKE ELEVATION CONTOUR
 - PROPERTY BOUNDARY
 - RECREATIONAL AREA 4
 - PROPOSED LIMIT OF DISTURBANCE RELATED TO PEDA OUTFALL
 - PRE-DESIGN PCB SOIL SAMPLE LOCATION
 - PRIOR (HISTORICAL) PCB SOIL SAMPLE LOCATION
 - AREA PROPOSED FOR REMOVAL OF TOP 3 FEET

- NOTES:**
1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1990; DATA PROVIDED BY GENERAL ELECTRIC COMPANY, AND BLASLAND BOUCK AND LEE ENGINEERS, P.C. CONSTRUCTION PLANS.
 2. NOT ALL PHYSICAL FEATURES SHOWN.
 3. SITE BOUNDARY IS APPROXIMATE.
 4. ALL LOCATIONS ARE APPROXIMATE.
 5. THE SILVER LAKE CONTOUR INFORMATION PRESENTED ON THIS DRAWING REPRESENTS THE RESULTS OF A SURVEY PERFORMED BY OCEAN SURVEYS, INC. ON 10-13 JUNE 2003 AND CAN ONLY BE CONSIDERED AS INDICATING THE CONDITIONS EXISTING AT THAT TIME. REUSE OF THIS INFORMATION BY CLIENT OR OTHERS BEYOND THE SPECIFIC SCOPE OF WORK FOR WHICH IT WAS ACQUIRED SHALL BE AT THE SOLE RISK OF THE USER AND WITHOUT LIABILITY TO OSI.

GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
 PROPOSED SILVER LAKE
 BANK SOIL REMOVAL

**PROPOSED
 SOIL REMOVAL AND PCB
 SOIL SAMPLING LOCATIONS**

BBL
 an ARCADIS company

FIGURE
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