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GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

March 19, 2007

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

**Re: GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts
Silver Lake Area (GEC600)
Summary of Bank Soil Removal Activities Associated with
Pilot Study Implementation**

Dear Ms Svirsky:

This letter summarizes the soil removal actions that were performed on November 8-10, 2006 by the General Electric Company (GE) during implementation of a sediment capping pilot study at the Silver Lake Area Removal Action Area (Silver Lake RAA) in Pittsfield, Massachusetts. In June 2006, GE submitted to the U.S. Environmental Protection Agency (EPA) a document titled *Pilot Study Work Plan for Silver Lake Sediments* (Pilot Study Work Plan) that described the sediment capping pilot study activities proposed for an approximate one-acre portion of Silver Lake. The Pilot Study Work Plan was conditionally approved by EPA in a letter dated July 18, 2006.

Since the sediment capping pilot study involved a portion of the adjacent bank, GE performed a preliminary assessment of the available soil data for polychlorinated biphenyls (PCBs) and other constituents, in the vicinity of the pilot study area. The bank portion of the pilot study test area is located within an area known as Recreational Area 4 (Figure 1). As discussed with EPA during the July 2006 technical meeting held in Pittsfield, the results of this preliminary assessment indicated that some bank soil removal would likely be necessary to satisfy the applicable Performance Standards for the Silver Lake Banks, as set forth in the Consent Decree (CD), in the northern portion of the pilot study area within Recreational Area 4. To protect the integrity of the pilot study cap and armor system, GE proposed in a letter dated August 22, 2006, to remove certain bank soils associated with sample location RA-4-SB-8 within Recreational Area 4 in conjunction with the implementation of the pilot study. The approximate limits of the initially proposed removal area are shown on Figure 2. EPA conditionally approved the proposed bank soil removal in a letter dated August 30, 2006.

Following EPA's approval of the initially proposed bank soil removal limits, and in the course of preparing for the pilot study, GE refined the preliminary Removal Design/Removal Action (RD/RA) evaluations and related soil removal limits associated with sample location RA-4-SB-8 through the collection of additional soil data. Specifically, on September 15, 2006, GE collected two additional samples within Recreational Area 4 east of sample location RA-4-SB-8 at the

approximate mid-bank (SL-BS-0.50-1) and in the upper third of the bank (SL-BS-0.83-1). Figure 2 shows the sampling locations and PCB analytical results associated with the two additional soil samples, as well as select prior samples from previous investigations located within Recreational Area 4. Using the PCB results from the two additional sample locations, GE updated the previous preliminary RD/RA evaluations for Recreational Area 4. GE discussed the results with EPA and, with EPA's approval, revised the limits of bank soil removal. The revised removal area is shown on Figure 2. Details related to the performance of bank soil removal, the appearance of stained soil during the removal, and restoration activities are provided below.

Summary of Bank Soil Removal Activities

To facilitate disposal of removed soils, on August 25, 2006, GE collected a soil sample (RA4-PILOT) from within the initially proposed bank soil removal limits for analysis of Toxicity Characteristic Leaching Procedure (TCLP) constituents. In addition, following revision to the bank soil removal limits, on September 29, 2006, GE collected an additional soil sample (RA4-PILOT-2) for analysis of TCLP constituents (Figure 2). Analytical results for both samples indicated that TCLP concentrations were below the levels specified in EPA's regulations under the Resource Conservation and Recovery Act (RCRA) for constituting hazardous waste, indicating that soils were not subject to RCRA hazardous waste disposal requirements. A summary of the TCLP analytical results from both samples is provided in Table 1. Given these results and the PCB data from the soils, GE determined that the soils could be transported to and disposed of at a facility authorized to receive waste regulated under the Toxic Substances Control Act (TSCA).

On November 8-10, 2006, GE performed the bank soil removal activities at and adjacent to sample location RA-4-SB-8 within Recreational Area 4 (Figure 2). These bank soil removal activities resulted in the removal of approximately 70 cubic yards (cy) of soil to depths generally extending up to 3 feet below ground surface (bgs). Details related to the extent and depth of the completed excavation, and a representative cross-section illustrating pre-existing, excavated, and restored elevations, are shown on Figure 3.

Prior to performing bank soil removal, the limits of removal were demarcated and the area subject to removal was isolated from lake surface water through the construction of a polyethylene-lined hay bale berm. During excavation, unsaturated soils were directly loaded into lined trucks and transported to a TSCA material staging area located at GE's Building 65 for temporary staging. Saturated soils were initially allowed to dewater via gravity within the open excavation prior to being placed within lined trucks for transport to Building 65. Trucks with excess decant water were temporarily held at the removal area while water was collected from within the lined bed and placed in a 200-gallon high-density polyethylene (HDPE) tank. During the performance of removal activities, approximately 250 gallons of decant water were collected and transported to GE's Building 64G water treatment facility for treatment.

Following the temporary staging at Building 65, approximately 100 tons of soil were transported to and disposed of at CWM Chemical Services, L.L.C., Model City, New York.

Appearance of Stained Soil during Removal Activities

During the course of bank soil removal activities, an area of stained soil was encountered near the northern extent of the bank soil removal area. The stained materials were located in a portion of the excavation sidewall at a depth of approximately 1- to 2-feet bgs. Following removal to the

pre-determined excavation depth of 3 feet in this area, EPA and GE agreed to temporarily discontinue further removal of these materials and sample the stained soil for PCBs, volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs). These materials were transported to Building 65 for temporary staging and segregated from the remainder of the excavated soil while awaiting characterization results. A summary of the analytical results from this sample is provided in Table 2. As indicated in Table 2, VOCs were not detected, PCBs were detected at a concentration of 9.4 parts per million (ppm), and a few SVOCs were detected at relatively low levels.

Following review of the analytical results, EPA and GE agreed that the stained materials were not subject to RCRA disposal regulations, and thus could be handled consistent with the remainder of bank soils subject to removal (i.e., subject to TSCA regulations). In addition, EPA and GE agreed that GE would discontinue removal activities in this area and would discuss with EPA potential future activities related to the stained materials in this area and/or potentially within other areas of the Silver Lake RAA as part of the future RD/RA activities.

Restoration

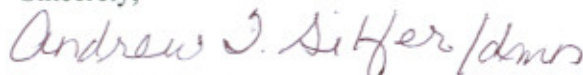
Following bank soil removal activities, the excavation area within the limits of the pilot study was restored in accordance with the Pilot Study Work Plan. The excavation area outside (i.e., to the north) the limits of the pilot study was backfilled to original grade with clean backfill from a n EPA-approved backfill source, lined with a woven geotextile, and covered with armor stone similar to that specified in the Pilot Study Work Plan.

Future Activities

GE will incorporate the soil removal activities described in this letter into the Conceptual RD/RA Work Plan for the Silver Lake RAA bank soils (including Recreational Area 4) to be submitted to EPA in early May 2007. GE will also provide EPA with a sampling proposal for the further characterization of the stained materials discussed above.

Please contact me with questions or comments.

Sincerely,



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

ATS/dmn
Attachments

cc: Susan Steenstrup, MDEP
Jane Rothchild, MDEP*
Anna Symington, MDEP*
Dean Tagliaferro, USEPA
Richard Fisher, USEPA
Holly Inglis, USEPA
Tim Conway, USEPA
Rose Howell, USEPA*

Thomas Fredette, USACE
Kenneth Munney, USFWS
Michael Palermo, Mike Palermo Consulting
Dale Young MA EOE
Nancy Harper, MA AG*
Linda Palmieri, Weston Solutions
Scott Campbell, Weston Solutions
Mayor James Ruberto, City of Pittsfield
Michael Carroll, GE*
Rod McLaren, GE*
Richard Gates, GE
James Nuss, ARCADIS BBL
Stuart Messur, ARCADIS BBL
Mark Graveling, ARCADIS BBL
James Bieke, Goodwin Procter
Public Information Repositories
GE Internal Repositories

* *without attachments*

Tables

**TABLE 1
ANALYTICAL DATA ASSOCIATED WITH TCLP CONSTITUENTS**

**SILVER LAKE PILOT STUDY BANK SOIL REMOVAL
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in parts per million, ppm)**

Parameter	Sample ID: Sample Depth(Feet): Date Collected:	TCLP Regulatory Limits	RA4-Pilot 0-3 8/25/2006	RA4-Pilot-2 0-3 9/29/2006
Volatile Organics				
1,1-Dichloroethene		0.7	ND(0.010)	ND(0.010)
1,2-Dichloroethane		0.5	ND(0.010)	ND(0.010)
2-Butanone		200	ND(0.25)	ND(0.25)
Benzene		0.5	ND(0.010)	ND(0.010)
Carbon Tetrachloride		0.5	ND(0.010)	ND(0.010)
Chlorobenzene		100	ND(0.010)	ND(0.010)
Chloroform		6	ND(0.010)	ND(0.010)
Tetrachloroethene		0.7	ND(0.010)	ND(0.010)
Trichloroethene		0.5	ND(0.010)	ND(0.010)
Vinyl Chloride		0.2	ND(0.010)	ND(0.010)
Semivolatile Organics				
1,4-Dichlorobenzene		7.5	ND(0.010)	ND(0.010)
2,4,5-Trichlorophenol		400	ND(0.010)	ND(0.010)
2,4,6-Trichlorophenol		2	ND(0.010)	ND(0.010)
2,4-Dinitrotoluene		0.13	ND(0.010)	ND(0.010)
Cresol		200	ND(0.010)	ND(0.010)
Hexachlorobenzene		0.13	ND(0.010)	ND(0.010)
Hexachlorobutadiene		0.5	ND(0.010)	ND(0.010)
Hexachloroethane		3	ND(0.010)	ND(0.010)
Nitrobenzene		2	ND(0.010) J	ND(0.010)
Pentachlorophenol		100	ND(0.050)	ND(0.050)
Pyridine		5	ND(0.010) J	R
Organochlorine Pesticides				
Endrin		0.02	ND(0.0020)	ND(0.0020)
Gamma-BHC (Lindane)		0.4	ND(0.040)	ND(0.040)
Heptachlor		0.008	ND(0.0040)	ND(0.0040)
Heptachlor Epoxide		0.008	ND(0.0040)	ND(0.0040)
Methoxychlor		10	ND(0.10)	ND(0.10)
Technical Chlordane		0.03	ND(0.0030)	ND(0.0030)
Toxaphene		0.5	ND(0.050)	ND(0.050)
Herbicides				
2,4,5-TP		1	ND(0.10)	ND(0.10)
2,4-D		10	ND(0.40)	ND(0.40)
Inorganics				
Arsenic		5	ND(0.200) J	ND(0.200)
Barium		100	0.248 J	0.674 B
Cadmium		1	0.00520 J	0.0188 B
Chromium		5	0.00770 J	0.0423 B
Lead		5	0.0625 J	0.191
Mercury		0.2	ND(0.000570)	0.0000930 B
Selenium		1	ND(0.200)	ND(0.200)
Silver		5	ND(0.100) J	ND(0.100)

Notes:

1. Samples were collected by ARCADIS BBL, and submitted to SGS Environmental Services, Inc. for analysis of TCLP constituents.
2. Samples have been validated as per Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP), General Electric Company, Pittsfield, Massachusetts, Blasland Bouck & Lee, Inc. (approved May 29, 2004 and resubmitted June 19, 2004).
3. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.

Data Qualifiers:

Organics (volatiles, semivolatiles, pesticides, herbicides,)

- J - Indicates that the associated numerical value is an estimated concentration.
- R - Data was rejected due to a deficiency in the data generation process.

Inorganics

- B - Indicates an estimated value between the instrument detection limit (IDL) and (PQL).
- J - Indicates that the associated numerical value is an estimated concentration.

TABLE 2
ANALYTICAL DATA ASSOCIATED WITH STAINED MATERIAL
SILVER LAKE PILOT STUDY BANK SOIL REMOVAL
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Parameter	Sample ID: Date Collected:	RA4-Bank-1108-1 11/08/06
Volatile Organics		
None Detected		--
PCBs		
Aroclor-1254		7.3
Aroclor-1260		2.1
Total PCBs		9.4
Semivolatile Organics		
3&4-Methylphenol		0.46 J
Anthracene		0.18 J
Benzo(a)anthracene		0.86
Benzo(a)pyrene		0.88
Benzo(b)fluoranthene		1.2
Benzo(k)fluoranthene		0.43 J
Chrysene		1.1
Fluoranthene		1.3
Naphthalene		0.076 J
Phenanthrene		0.72 J
Phenol		0.34 J
Pyrene		1.5

Notes:

1. Sample was collected by ARCADIS BBL, and submitted to Northeast Analytical, Inc. and SGS Environmental Services, Inc. for analysis of PCBs, volatiles and semivolatiles.
2. Sample has been validated as per Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP), General Electric Company, Pittsfield, Massachusetts, Blasland Bouck & Lee, Inc. (approved May 29, 2004 and resubmitted June 19, 2004).
3. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.
4. Only detected constituents are summarized.
5. -- Indicates that all constituents for the parameter group were not detected.

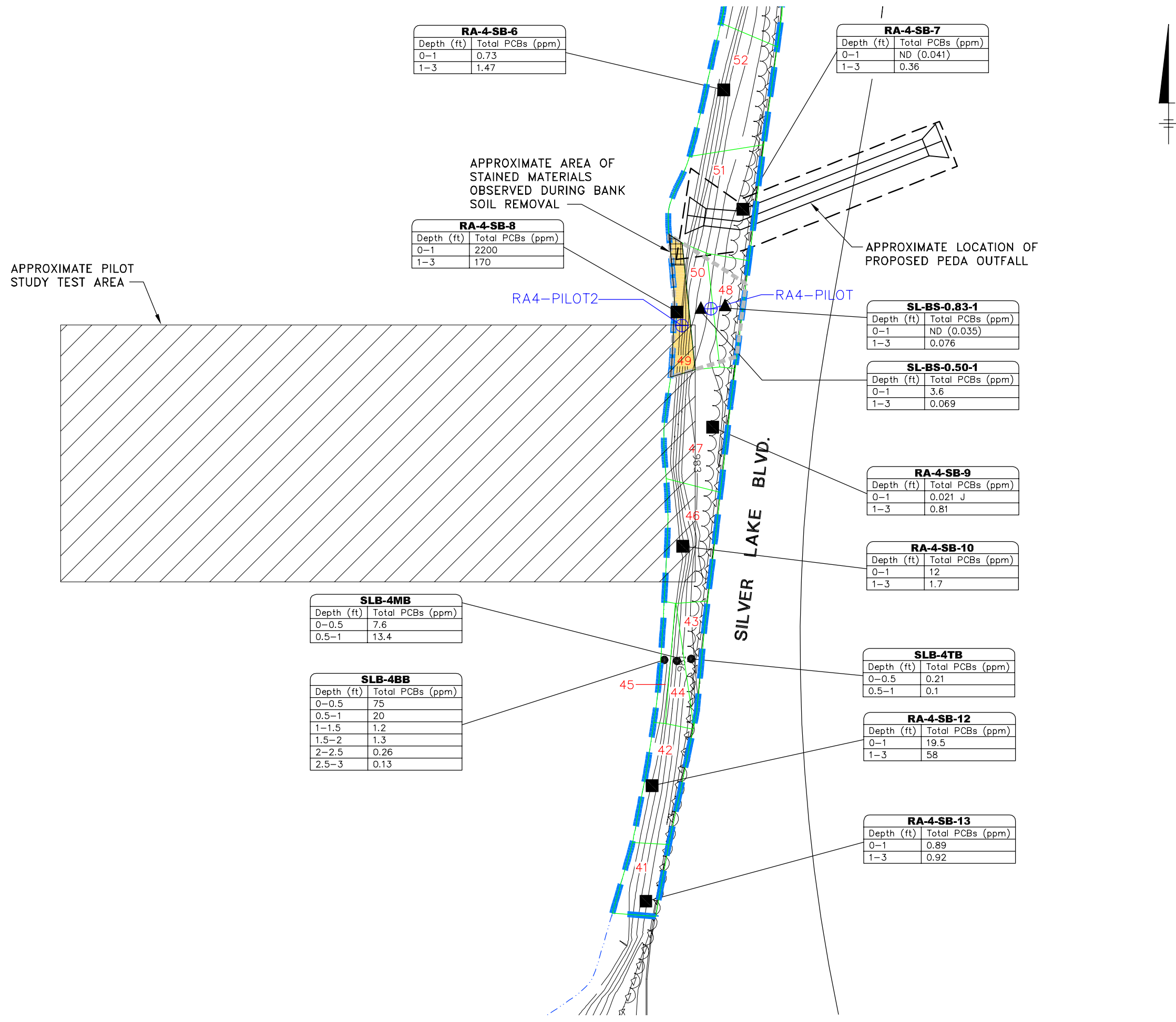
Data Qualifiers:

Organics (PCBs, volatiles, semivolatiles)

J - Indicates that the associated numerical value is an estimated concentration.

Figures

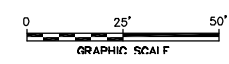
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 PROJECT NAME: 40152001
 IMAGES:



LEGEND:

- RECREATIONAL AREA 4 BOUNDARY
- SURFACE ELEVATION (1-FT CONTOUR)
- GUARDRAIL
- MEAN WATER ELEV (975.9 FT) (APPROX.)
- PRIOR (HISTORICAL) PCB SOIL SAMPLE LOCATION
- PRE-DESIGN PCB SOIL SAMPLE LOCATION
- APPROXIMATE LOCATION OF TCLP SOIL SAMPLES COLLECTED DURING THE PERFORMANCE OF PILOT STUDY
- ADDITIONAL SAMPLE LOCATIONS COLLECTED DURING THE PERFORMANCE OF PILOT STUDY
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 50 POLYGON ID
- AREA OF INITIALLY PROPOSED BANK SOIL REMOVAL
- APPROXIMATE AREA OF BANK SOIL REMOVAL
- APPROXIMATE AREA OF STAINED MATERIALS ENCOUNTERED DURING BANK SOIL REMOVAL ACTIVITIES
- APPROXIMATE PILOT STUDY TEST AREA

- NOTES:**
- BASE MAP MODIFIED FROM ELECTRONIC FILE OF SURVEY PERFORMED BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, DRAWING NO. CX101, REV A, DATED 3/15/06. DUE TO SNOW COVER AT TIME OF SURVEY, ALL PHYSICAL FEATURES MAY NOT BE SHOWN.
 - ADDITIONAL BASE MAPPING FOR BANK SOIL REMOVAL MODIFIED FROM ELECTRONIC FILE OF SURVEY PERFORMED BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, PROVIDED 2/16/07.
 - ALL SAMPLE LOCATIONS SHOWN ARE APPROXIMATE.

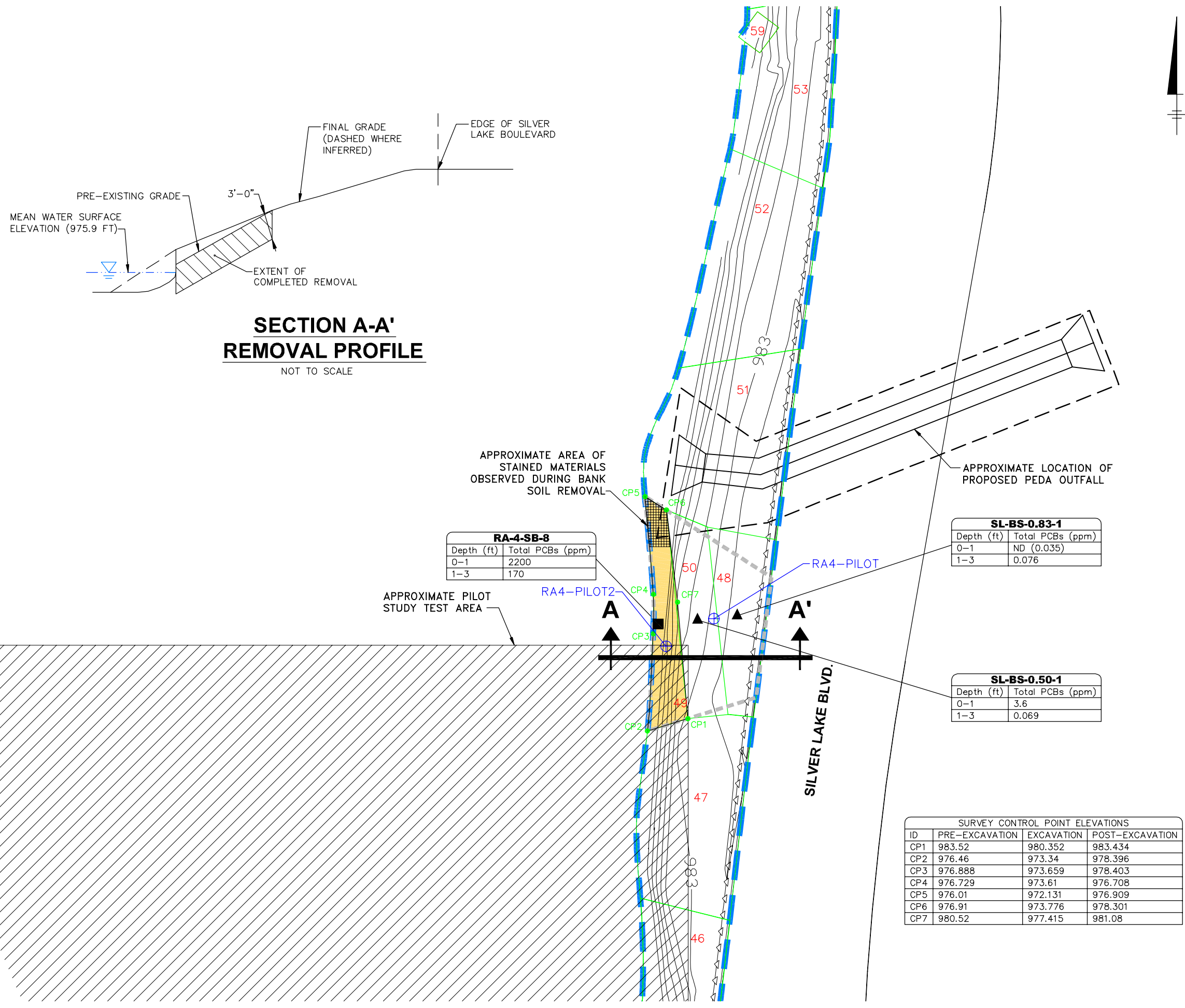


GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
PILOT STUDY BANK SOIL REMOVAL

**BANK SOIL REMOVAL ASSOCIATED
 WITH PILOT STUDY IMPLEMENTATION**

FIGURE
2

SVR-BS-LP LAF PGL LAYER: ON=*, OFF=REF, (FRZ)
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 40152X01



RA-4-SB-8	
Depth (ft)	Total PCBs (ppm)
0-1	2200
1-3	170

SL-BS-0.83-1	
Depth (ft)	Total PCBs (ppm)
0-1	ND (0.035)
1-3	0.076

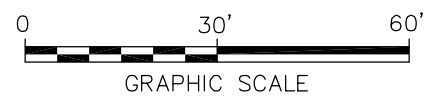
SL-BS-0.50-1	
Depth (ft)	Total PCBs (ppm)
0-1	3.6
1-3	0.069

SURVEY CONTROL POINT ELEVATIONS			
ID	PRE-EXCAVATION	EXCAVATION	POST-EXCAVATION
CP1	983.52	980.352	983.434
CP2	976.46	973.34	978.396
CP3	976.888	973.659	978.403
CP4	976.729	973.61	976.708
CP5	976.01	972.131	976.909
CP6	976.91	973.776	978.301
CP7	980.52	977.415	981.08

LEGEND:

- — — — — RECREATIONAL AREA 4 BOUNDARY
- — — — — SURFACE ELEVATION (1-FT CONTOUR)
- ▽▽▽▽▽ GUARDRAIL
- - - - - MEAN WATER ELEV (975.9 FT) (APPROX.)
- CP1 SURVEY CONTROL POINT PROVIDED BY HILL ENGINEERS, ARCHITECTS, AND PLANNERS
- PRE-DESIGN PCB SOIL SAMPLE LOCATION
- ⊕ APPROXIMATE LOCATION OF TCLP SOIL SAMPLES COLLECTED DURING THE PERFORMANCE OF PILOT STUDY
- ▲ ADDITIONAL SAMPLE LOCATIONS COLLECTED DURING THE PERFORMANCE OF PILOT STUDY
- △ HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 50 POLYGON ID
- AREA OF INITIALLY PROPOSED BANK SOIL REMOVAL
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 2. ADDITIONAL BASE MAPPING FOR BANK SOIL REMOVAL MODIFIED FROM ELECTRONIC FILE OF SURVEY PERFORMED BY HILL ENGINEERS, ARCHITECTS, AND PLANNERS, PROVIDED 2/16/07.
 3. ALL SAMPLE LOCATIONS SHOWN ARE APPROXIMATE.



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
PILOT STUDY BANK SOIL REMOVAL

DETAIL OF BANK SOIL REMOVAL

infrastructure, environment, facilities

FIGURE
3