



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

04-0019

SDMS 261523

January 14, 2004

Mr. Andrew T. Silber
Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Final Conditional Approval of General Electric's October 2003 *Silver Lake Area Pre-Design Investigation Work Plan Addendum for Soils Adjacent to Silver Lake*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silber:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the pre-design investigation work plan described in the above-referenced *Silver Lake Area Pre-Design Investigation Work Plan Addendum for Soils Adjacent to Silver Lake* (PDI Work Plan Addendum). The PDI Work Plan Addendum is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the above-referenced submittal subject to the following conditions:

1. Subsection 2.3, third bullet on Page 2-2: EPA concurs that a monitoring well should not be installed at location I9-9-24-SB-1 at this time. GE shall advance an additional soil boring (I9-9-24-SB-6) at the top of bank, upgradient from the location, in order to determine the lateral extent of the NAPL.
2. In Subsection 2.4, GE introduces EPA split analytical results in Table 2-5. In the future, such tables shall include the GE location ID in the table, for cross-referencing purposes.
3. Although additional Appendix IX+3 data needs have not been evaluated by GE in the PDI Work Plan Addendum, a replacement for the Appendix IX+3 semi-volatile organic compounds (SVOCs) fraction of the sample collected from location I9-9-32-SB-3 must be collected, as the data for the original sample were mostly rejected. GE shall collect a subsurface soil sample from location I9-9-32-SB-2 (1- to 3-ft depth interval) for analysis for Appendix IX+3 SVOCs.
4. The following are EPA's specific comments regarding GE's evaluation of PCB data for the following residential properties.
 - a. Parcel I9-9-1: GE's proposed supplemental sample location I9-9-1-SB-6 is not acceptable as a substitute for sampling to the depth of PCB non-detection at existing sample locations SLB-8BB, A168, and B144. GE shall evaluate PCB concentrations at existing sampling location B144, not at a new location in between the three existing locations.

- b. Parcel I9-9-9: GE shall move proposed supplemental sample location I9-9-9-SB-6 east approximately 15 ft, to a slightly lower elevation and to achieve a better distribution of sampling locations on the parcel.
 - c. Parcel I9-9-24: As noted in Condition 1, GE shall advance an additional soil boring (I9-9-24-SB-6) at the top of bank, in order to determine the lateral extent of the NAPL noted at location I9-9-24-SB-1. The soil boring should be advanced mid-way between locations I9-9-24-SB-1 and I9-9-24-SS-4, with samples collected for PCB analysis from the 0- to 1-ft and 1- to 3-ft depth intervals. GE shall reevaluate additional sampling needs on the non-bank portion of the property upon receipt of the analytical results from location I9-9-24-SB-6.
 - d. Parcel I9-10-8: GE shall collect samples from the 3- to 5-ft and 5- to 7-ft depth intervals at proposed supplemental sample locations I9-10-8-SB-12 through I9-10-8-SB-15 during this sampling round, and hold them for PCB analysis as warranted by the shallower analytical results.
5. The following are EPA's specific comments regarding GE's evaluation of PCB data for the following commercial properties.
- a. Parcel I9-9-25: GE shall move one or both of proposed samples I9-9-25-SB-8 and I9-9-25-SB-9 10 ft to the east, away from the western property boundary.

In addition, GE indicates that the soil borings will be advanced to a depth of 15 ft or refusal. Refusal is not considered as a valid reason for terminating a subsurface investigation, unless refusal occurs at sufficient depth that all pertinent depth intervals have been characterized. In some cases, alternative methods of sample collection, such as use of a drill rig and split spoons, may be needed to collect samples from a given location. GE and EPA field representatives will discuss options and make field decisions regarding refusal on a case-by-case basis.
 - b. Parcel I9-9-31: GE does not propose any additional sampling on this parcel at this time. GE shall preemptively collect (and hold for future analysis) subsurface soil samples at two locations (I9-9-31-SB-4 and I9-9-31-SB-5) near the western edge of the parcel.
 - c. Parcel I9-9-32: GE shall collect non-bank subsurface soil samples to 6 ft bgs at an additional location (I9-9-32-SB-4) approximately 50 ft southeast of location I9-9-32-SB-2.
 - d. Parcel I9-9-34: GE proposes three additional samples on this parcel (I9-9-34-SB-10 through I9-9-34-SB-12). GE shall relocate sample I9-9-34-SB-12 to approximately 45 ft southwest of existing sample location I9-9-34-SB-4.
6. GE Figures 2-1 through 2-4 do not indicate the extent of pavement on each property. GE shall update Figures 2-1 through 2-4 to include the extent of pavement in subsequent submittals, based on available information.
7. GE should note that when additional PCB sampling on one parcel indicates that PCBs above 2 ppm extend to the edge of the parcel, GE shall extend sampling onto the adjacent parcel, even if bank soil analytical results for the adjacent parcel do not indicate PCBs are present.

GE shall complete the supplemental sampling included in the PDI Work Plan Addendum in accordance with the requirements listed above in this letter within six weeks from the date of this

Final Conditional Approval Letter. GE shall submit the interim pre-design investigation report within six months of the date of this Final Conditional Approval Letter.

If there is any conflict between the Performance Standards as described in the Report and as set forth in the Consent Decree and/or Statement of Work for Removal Actions Outside the River (Appendix E to the Consent Decree), the Statement of Work shall control. EPA reserves its right to perform additional sampling in the areas subject to Proposal and/or require additional sampling or response actions, if necessary, pursuant to the Consent Decree.

If you have any questions, please contact me at (617) 918-1268.

Sincerely,



Michael J. Nalipinski
GE Facility Project Manager

cc: John Novotny,	GE
Richard Gates,	GE
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Dawn Jamros,	Weston Solutions
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Property Owners	
Public Information Repositories	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

04-0024
SDMS 210661

March 30, 2004

Mr. Andrew T. Silfer
Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's March 2004 *Proposal for Additional Pre-Design Sampling for Soils Adjacent to Silver Lake*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the pre-design investigation work plan described in the above-referenced *Proposal for Additional Pre-Design Sampling for Soils Adjacent to Silver Lake* (Proposal). The Proposal is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the above-referenced submittal subject to the following conditions:

- 1. GE shall analyze the samples collected from the various depth intervals to 15 ft bgs from sampling location I9-9-19-SB-3 which were previously collected by EPA and have been held for possible future analysis. EPA is concerned that the holding times for these samples will expire before they are analyzed.

GE shall complete the supplemental sampling included in the Proposal in accordance with the requirements listed above in this letter within six weeks from the date of this Final Conditional Approval Letter. GE shall submit the interim pre-design investigation report within six months of the date of this Final Conditional Approval Letter.

If there is any conflict between the Performance Standards as described in the Proposal and as set forth in the Consent Decree and/or Statement of Work for Removal Actions Outside the River (Appendix E to the Consent Decree), the Statement of Work shall control. EPA reserves its right to perform additional sampling in the areas subject to Proposal and/or require additional sampling or response actions, if necessary, pursuant to the Consent Decree.

If you have any questions, please contact me at (617) 918-1268.

Sincerely,

Michael J. Nalipinski
GE Facility Project Manager

- cc: Richard Gates, GE
- James Bieke, Shea & Gardner
- Jim Nuss, BBL
- Sue Steenstrup, MDEP
- Robert Bell, MDEP
- Anna Symington, MDEP
- Eileen Barnes, MDEP
- Holly Inglis, US EPA
- John Kilborn, US EPA
- Rose Howell, US EPA
- K.C. Mitkevicius, USACE
- Dawn Jamros, Weston Solutions
- Pittsfield MA Office, US EPA
- Mayor James Roberto, City of Pittsfield
- Property Owners
- Public Information Repositories