



Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue, Pittsfield, MA 01201

04-0032
SDMS 261524

Transmitted Via Overnight Courier

June 23, 2004

Mr. Dean Tagliaferro
On-Scene Coordinator
U.S. Environmental Protection Agency
c/o Weston Environmental Engineering
One Lyman Street
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
Planned Excavations at Parcel I9-9-34 at Silver Lake Area (GECD600) and
Parcel K10-11-5 at Former Oxbow Areas J and K (GECD420)**

Dear Mr. Tagliaferro

Over the last few weeks, the General Electric Company (GE) has been in contact with the common owner of two separate properties in Pittsfield, Massachusetts, namely, Parcels I9-9-34 and K10-11-5. The owner of those properties has decided to upgrade the existing structure located on Parcel I9-9-34. The plans for that project will require the excavation and removal of soil from that parcel. Moreover, because portions of that parcel are located within the 100-year floodplain, and because the upgrade activities will result in a loss of existing flood storage capacity, the property owner has decided to grade and remove soil from Parcel K10-11-5 to provide offsetting compensatory flood storage capacity.

Although the development activities are private activities being undertaken by an individual property owner, and, therefore, would not require any action or participation by GE, GE is writing to EPA because the property owner has asked GE for information concerning the constituents present in soil in the vicinity of the areas to be excavated and for any views that GE may have as to the disposition of the excavated soil. This letter outlines GE's information and views on these matters for EPA's review.

Summary of Property Development Activities

As shown on Figure 1, the owner plans to excavate soil at Parcel I9-9-34 to a depth of approximately 4 feet below ground surface (bgs) as part of an addition to the existing building on that property. To provide compensatory flood storage capacity for the Housatonic River as a result of the building addition, the property owner plans to conduct soil removal and grading at an area at Parcel K10-11-5, which he also owns. The area at which the owner plans to conduct this removal and regrading is shown on Figure 2. The planned depths of removal associated with this regrading range from approximately 0.5 foot to 1 foot bgs.

Parcel I9-9-34

Parcel I9-9-34 is located on the banks of Silver Lake. Based on the bank soil sampling previously performed by GE and EPA as part of the sampling of the Silver Lake Area Removal Action Area (RAA), GE proposed, in its *Pre-Design Investigation Work Plan Addendum for Soils Adjacent to Silver Lake* (October 2003) (*Silver Lake Soils Addendum*), to collect three samples from the non-bank portion of this property. Those samples were proposed to be collected from locations I9-9-34-SB-10, -11, and -12, as

shown on Figure 1. The *Silver Lake Soils Addendum* was conditionally approved by EPA on March 30, 2004, and the proposed samples on Parcel I9-9-34 were subsequently collected and analyzed for polychlorinated biphenyls (PCBs). Although an Interim Pre-Design Investigation Report for the Silver Lake banks has not yet been submitted to EPA under the approved schedule for that report, the results of those samples have been submitted to EPA and are set forth on the attached Table 1. As shown on Table 1, the PCB results from the samples collected on Parcel I9-9-34 range from non-detect to 1.88 parts per million (ppm) (0- to 1-foot, 1- to 3-foot, and 3- to 6-foot depth increments). Therefore, consistent with the approved *Silver Lake Soils Addendum*, GE does not plan to propose extending the Silver Lake Area RAA onto the non-bank portion of Parcel I9-9-34 or to propose any additional sampling (for PCBs or other constituents) at the non-bank portion of that parcel.

As shown on Figure 1, the development activities planned by the property owner are proposed in a non-bank area of the parcel that, as discussed above, will remain outside the limits of the Silver Lake Area RAA and thus will not be subject to the Consent Decree. As a consequence, GE takes no position on the appropriate disposition of soils from this parcel. GE notes that even if these soils were located within the RAA, the PCB levels detected in the non-bank portion of the parcel are below the PCB Performance Standard of 2 ppm for residential properties. In view of the former use of this property as a service station, however, GE believes it would be prudent for the owner to sample any excavated soil for petroleum-related contamination and associated constituents in evaluating options for the disposition of that soil.

Parcel K10-11-5

Parcel K10-11-5 is located within Former Oxbow Areas J and K. GE has reviewed available soil analytical data for PCBs and non-PCB Appendix IX+3 constituents from the 0- to 1-foot and 1- to 3-foot and 3- to 6-foot depths increments within or near the planned excavation area. These data are presented in Tables 2 and 3.

As shown in Table 2, PCB results for the [nine] soil samples (0- to 1-foot and 1- to 3-foot depth increments) in proximity to the planned removal/regrading area range from non-detect to 0.73 ppm. Surface sample RAA15-D25, taken from within the area to be excavated or regraded, showed 0.27 ppm PCBs. As shown on Figure 2, all of the samples listed in Table 2 are located within or near to the area where soil removal and regrading is planned for the purpose of providing compensatory flood storage capacity.

Table 3 presents the Appendix IX+3 data for samples located within or adjacent to the area where soil excavation and regrading are planned at Parcel K10-11-5. As shown on Table 3, three soil samples from three locations (0- to 1-foot or 1- to 3-foot depth increment) were analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), dioxins/furans, and inorganics. As shown on Figure 2, soil boring RAA15-D25 is located within the area where soil excavation is planned, and surface sample RAA15-C23 and soil boring RAA15-C24 are located approximately 20 feet and 10 feet north of the removal area, respectively. The analytical results for these samples are below Massachusetts Contingency Plan (MCP) Method 1 S-1 soil standards.

Given that the PCB results for samples collected at or close to the planned excavation are less than 2 ppm and the concentrations of other Appendix IX+3 constituents at and in proximity to the planned excavation/regrading area are below MCP Method 1 standards, GE intends to allow the property owner to dispose of these materials, approximately 85 (cy), in the existing GE soil backfill area located at the corner of New York Avenue and Merrill Road.

GE would appreciate EPA's review of the above information and any reaction it may have at your earliest opportunity. Please call me if you have any questions regarding these matters.

Sincerely,

Richard W. Gates /DAJ

Richard W. Gates
Remediation Project Manager

Attachments

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cc: Michael Nalipinski, EPA
Tim Conway, EPA
Susan Steenstrup, MDEP
Michael Carroll, GE*
Rod McLaren, GE
Andrew Silfer, GE
James Nuss, BBL
James Bieke, Shea & Gardner

* *without attachments*

Tables

**TABLE 1
PCB SOIL SAMPLING DATA FOR PARCEL I9-9-34**

**SILVER LAKE AREA
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)**

Sample ID	Depth(Feet)	Date Collected	Aroclor-1016, -1221, -1232, -1242, -1248	Aroclor-1254	Aroclor-1260	Total PCBs
I9-9-34-SB-10	0-1	2/19/2004	ND(0.21)	1.2	0.68	1.88
	1-3	2/19/2004	ND(0.039)	0.034 J	0.024 J	0.058 J
	3-6	2/19/2004	ND(0.039)	0.020 J	ND(0.039)	0.020 J
I9-9-34-SB-11	0-1	2/20/2004	ND(0.040)	0.41	0.41	0.82
	1-3	2/20/2004	ND(0.039) [ND(0.038)]	0.41 [0.38]	0.13 [0.11]	0.54 [0.49]
	3-6	2/20/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)
I9-9-34-SB-12	0-1	2/20/2004	ND(0.036)	ND(0.036)	0.041	0.041
	1-3	2/20/2004	ND(0.037)	0.26	0.12	0.38
	3-6	2/20/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)

Notes:

1. Samples were collected by Blasland, Bouck & Lee, Inc., and were submitted to CT&E Environmental Services, Inc. for analysis of PCBs.
2. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
3. Field duplicate sample results are presented in brackets.

Data Qualifiers:

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

TABLE 2
PCB SOIL SAMPLING DATA FOR PROPOSED RE-GRADING AREA AT PARCEL K10-11-5

FORMER OXBOW AREAS J AND K REMOVAL ACTION
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor-1016	Aroclor-1221	Aroclor-1232	Aroclor-1242	Aroclor-1248	Aroclor-1254	Aroclor-1260	Total PCBs
RAA15-C22	0-1	2/28/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.016 J	0.016 J
	1-3	2/28/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
RAA15-C23	0-1	3/3/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.0089 J	0.0089 J
RAA15-C24	0-1	3/3/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.041	0.041
	1-3	3/3/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.058	0.058
RAA15-C25	0-1	3/4/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.17	0.17
RAA15-D22	0-1	3/4/2003	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	0.029 J	0.029 J
RAA15-D23	0-1	3/4/2003	ND(0.051)	ND(0.051)	ND(0.051)	ND(0.051)	ND(0.051)	ND(0.051)	0.095	0.095
RAA15-D24	0-1	3/4/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.017 J	0.017 J
RAA15-D25	0-1	3/4/2003	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.082	0.19	0.272
RAA15-D26	0-1	3/4/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.73	0.73

Notes:

1. Samples were collected by Blasland, Bouck & Lee, Inc., and were submitted to Severn Trent Laboratories, Inc. for analysis of PCBs.
2. Samples have been validated as per Field Sampling Plan/Quality Assurance Project Plan, General Electric Company, Pittsfield, Massachusetts, Blasland, Bouck & Lee, Inc (approved November 4, 2002 and resubmitted December 10, 2002).
3. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
4. Field duplicate sample results are presented in brackets.

Data Qualifiers:

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

TABLE 3
APPENDIX IX+3 SOIL SAMPLING DATA FOR PROPOSED RE-GRADING AREA AT PARCEL K10-11-5

FORMER OXBOW AREAS J AND K REMOVAL ACTION
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
 (Results are presented in dry weight parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	RAA15-C23 0-1 03/03/03	RAA15-C24 1-3 03/03/03	RAA15-D25 0-1 03/04/03
Volatile Organics			
Acetone	ND(0.025)	ND(0.026)	0.012 J
Methylene Chloride	0.0037 J	0.0028 J	0.0021 J
Trichloroethene	ND(0.0062)	ND(0.0064)	0.0039 J
Semivolatile Organics			
2-Methylnaphthalene	ND(0.37)	ND(0.36)	0.062 J
Acenaphthylene	0.31 J	0.023 J	0.14 J
Anthracene	0.088 J	ND(0.36)	0.090 J
Benzo(a)anthracene	0.34 J	0.061 J	0.34 J
Benzo(a)pyrene	0.58	0.076 J	0.40
Benzo(b)fluoranthene	0.60	0.072 J	0.44
Benzo(g,h,i)perylene	0.25 J	ND(0.36)	0.18 J
Benzo(k)fluoranthene	0.56	0.077 J	0.40
Chrysene	0.41	0.088 J	0.46
Dibenzo(a,h)anthracene	0.074 J	ND(0.36)	0.055 J
Dibenzofuran	ND(0.37)	ND(0.36)	0.051 J
Fluoranthene	0.52	0.12 J	0.73
Indeno(1,2,3-cd)pyrene	0.26 J	ND(0.36)	0.22 J
Naphthalene	ND(0.37)	ND(0.36)	0.062 J
Phenanthrene	0.14 J	0.052 J	0.32 J
Pyrene	0.41	0.10 J	0.53
Furans			
2,3,7,8-TCDF	0.0000052 J	ND(0.0000047) X	ND(0.0000038) X
TCDFs (total)	ND(0.0000041) X	ND(0.000024) X	ND(0.000063) X
1,2,3,7,8-PeCDF	ND(0.0000013)	0.000011 J	0.000011 J
2,3,4,7,8-PeCDF	ND(0.0000012)	ND(0.0000012) X	0.000017 J
PeCDFs (total)	ND(0.0000061) X	ND(0.000027) X	ND(0.00013) X
1,2,3,4,7,8-HxCDF	ND(0.0000015) X	0.000015 J	0.000026 J
1,2,3,6,7,8-HxCDF	ND(0.0000055) X	ND(0.0000041) X	ND(0.000019) X
1,2,3,7,8,9-HxCDF	ND(0.0000011)	ND(0.0000028)	ND(0.0000018)
2,3,4,6,7,8-HxCDF	ND(0.0000019) X	ND(0.0000053) X	ND(0.000014) X
HxCDFs (total)	ND(0.0000035) X	ND(0.000027) X	ND(0.00011) X
1,2,3,4,6,7,8-HpCDF	0.0000041 J	0.000018 J	0.000026
1,2,3,4,7,8,9-HpCDF	ND(0.0000018)	ND(0.0000043)	0.000020 J
HpCDFs (total)	0.0000082 J	0.000033 J	ND(0.000078) X
OCDF	ND(0.000001)	ND(0.000013)	0.000065
Dioxins			
2,3,7,8-TCDD	ND(0.0000028)	ND(0.0000067) X	ND(0.0000041)
TCDDs (total)	ND(0.0000028)	ND(0.0000067) X	ND(0.000037) X
1,2,3,7,8-PeCDD	ND(0.0000016)	ND(0.0000043)	ND(0.0000052) X
PeCDDs (total)	ND(0.0000016)	ND(0.0000043)	ND(0.000038) X
1,2,3,4,7,8-HxCDD	ND(0.0000018)	ND(0.0000049)	ND(0.0000090) X
1,2,3,6,7,8-HxCDD	ND(0.0000017)	ND(0.0000046)	0.000039 J
1,2,3,7,8,9-HxCDD	ND(0.0000018)	ND(0.0000048)	0.000021 J
HxCDDs (total)	ND(0.0000018)	ND(0.000028) X	ND(0.000025) X
1,2,3,4,6,7,8-HpCDD	ND(0.0000060) X	0.000081 J	0.000073
HpCDDs (total)	ND(0.000011) X	0.000016 J	0.00016
OCDD	ND(0.0000049) J	0.000079	0.00051 J
Total TEQs (WHO TEFs)	0.0000039	0.000019	0.000046
Inorganics			
Antimony	ND(6.70) J	ND(6.50) J	0.660 J
Arsenic	2.50	2.60	9.30
Barium	21.1 B	22.5	30.8
Chromium	8.20	7.40	8.50
Cobalt	4.80 B	4.80 B	6.10
Copper	9.30	10.8	31.1 J
Lead	8.20 J	14.1 J	52.5
Mercury	0.0370 B	0.0350 B	0.0730
Nickel	9.20	8.80	12.9
Vanadium	8.10	7.30	10.9
Zinc	29.6	34.4	71.8

TABLE 3
APPENDIX IX+3 SOIL SAMPLING DATA FOR PROPOSED RE-GRADING AREA AT PARCEL K10-11-5

FORMER OXBOW AREAS J AND K REMOVAL ACTION
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Notes:

1. Samples were collected by Blasland Bouck & Lee, Inc., and were submitted to Severn Trent Laboratories, Inc. for analysis of Appendix IX+3 constituents.
2. Samples have been validated as per Field Sampling Plan/Quality Assurance Project Plan, General Electric Company, Pittsfield, Massachusetts, Blasland Bouck & Lee, Inc. (approved November 4, 2002 and resubmitted December 10, 2002).
3. With the exception of dioxin/furans, only those constituents detected in one or more samples are summarized.
4. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
5. NA - Not Analyzed.
6. Field duplicate sample results are presented in brackets.
7. Total 2,3,7,8-TCDD toxicity equivalents (TEQs) were calculated using Toxicity Equivalency Factors (TEFs) derived by the World Health Organization (WHO) and published by Van den Berg et al. in Environmental Health Perspectives 106(2), December 1998.

Data Qualifiers:

Organics (volatiles, semivolatiles, dioxin/furans)

- D - Compound quantitated using a secondary dilution.
- J - Indicates that the associated numerical value is an estimated concentration.
- Q - Indicates the presence of quantitative interferences.
- X - Estimated maximum possible concentration.
- Y - 2,3,7,8-TCDF results have been confirmed on a DB-225 column.

Inorganics

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

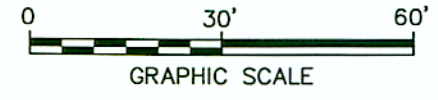
Figures



LEGEND

- EDGE OF WATER
- VEGETATION
- PROPERTY BOUNDARY
- 19-9-34** PROPERTY ID
- COMMERCIAL/INDUSTRIAL PROPERTY
- BANK PORTIONS OF COMMERCIAL/INDUSTRIAL PROPERTIES
- PRE-DESIGN PCB SOIL BORING LOCATION
- PRE-DESIGN PCB AND APPENDIX IX+3 SOIL SAMPLE LOCATION
- SUPPLEMENTAL PCB SOIL BORING LOCATION
- PLANNED CONSTRUCTION AREAS
- HAY BALES AND SILT FENCE

- NOTES:**
1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
 2. TAX ASSESSORS' PARCEL IDENTIFICATION NUMBERS AND BOUNDARY INFORMATION OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE AND IS CURRENT THROUGH SEPTEMBER 5, 1997.
 3. LOCATION OF PLANNED CONSTRUCTION AREA SUPPLIED BY HILL ENGINEERS, ARCHITECTS, PLANNERS, INC., FIGURE MI-942-L1, DATED 4/12/04, AT A SCALE OF 1"=20'.



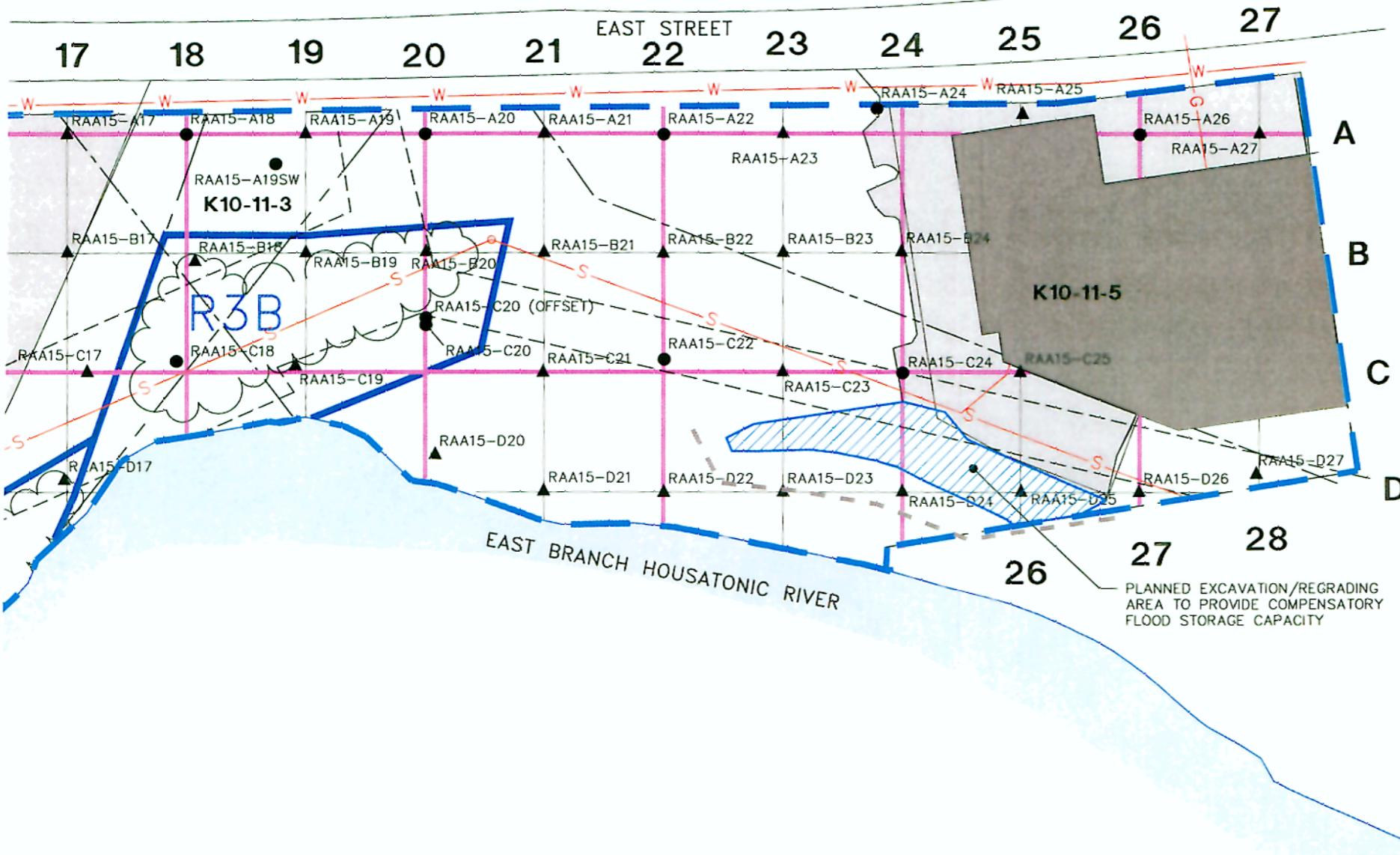
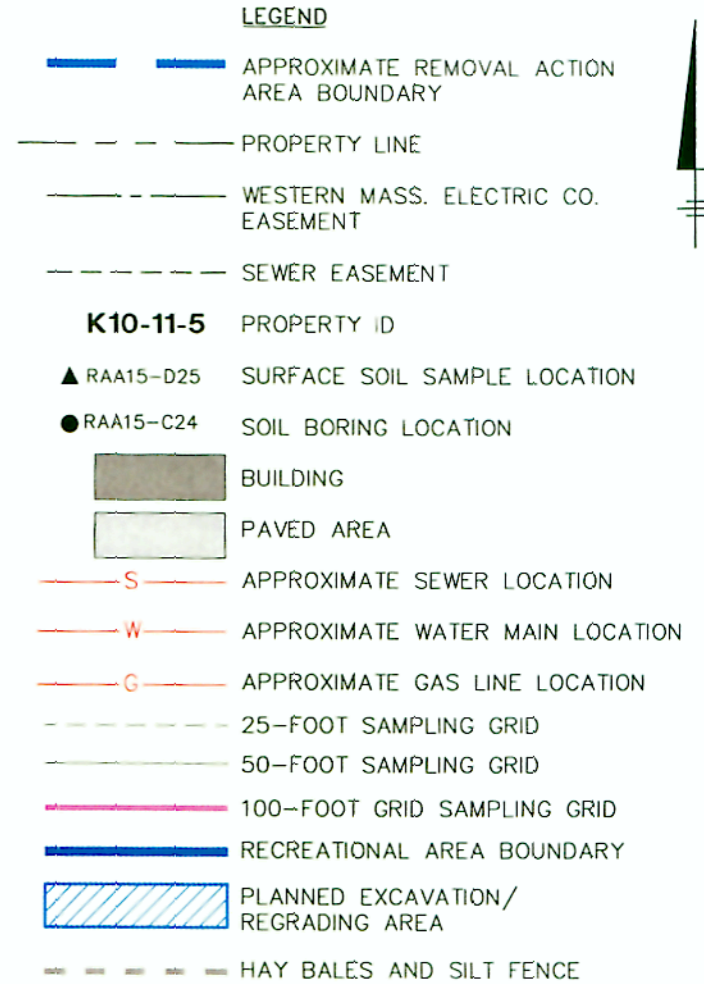
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

PLANNED CONSTRUCTION AREAS AT EAST STREET AUTO MALL/EXISTING SOIL SAMPLE LOCATIONS

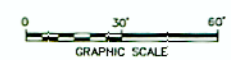
BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
1

X: 40152X02.DWG, 40152X03.DWG
LMAN: 426-A
P: PAGESET/PLT-BL
6/23/04 SYR-54-GMS LAF DMW
N/40152001/SOIL/40152B12.DWG



- GENERAL NOTES:**
1. BASE MAP MODIFIED FROM PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC -- FLOWN IN APRIL 1990.
 2. EASEMENTS AND PROPERTY LINES ARE APPROXIMATE.
 3. LOCATION OF PLANNED CONSTRUCTION AREA SUPPLIED BY HILL ENGINEERS, ARCHITECTS, PLANNERS, INC., FIGURE MI-942-L2, DATED 4/12/04, AT A SCALE OF 1"=20'.



GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
FORMER OXBOW AREAS J AND K

**PLANNED CONSTRUCTION AREA
AT PARCEL K10-11-5/EXISTING
SOIL SAMPLE LOCATIONS**

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
2