



*Transmitted via Federal Express*

GE  
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May 10, 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 (GECD600)  
Proposed Soil Sampling Plan Related to Stained Materials in Silver Lake Bank Soils  
Adjacent to Sediment Pilot Study Area**

Dear Ms Svirsky:

### **Introduction**

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 a portion of the Silver Lake Area Removal Action Area (Silver Lake RAA) in Pittsfield, Massachusetts. The Pilot Study Work Plan was conditionally approved by EPA in a letter dated July 18, 2006. In anticipation of potential future soil removal necessary to satisfy the applicable Performance Standards for the Silver Lake Banks, as set forth in the Consent Decree (CD), and to protect the integrity of the pilot study cap and associated bank armor system, GE proposed in a letter dated August 22, 2006, to remove certain bank soils within an area known as Recreational Area 4 (Figure 1) in conjunction with the implementation of the pilot study. EPA conditionally approved the proposed bank soil removal in a letter dated August 30, 2006.

### **Bank Soil Removal Activities**

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 in accordance with the approved plan. Figure 2 shows the location of RA-4-SB-8 and other nearby soil sample locations, and associated polychlorinated biphenyl (PCB) analytical results. The 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). 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, with stained materials located in a portion of the excavation sidewall at a depth of approximately 1- to 2-feet bgs. Following the completion of removal activities in this area EPA and GE agreed that GE would attempt to collect a sample of the stained materials from the approximate region where they were observed within the excavated area. With EPA oversight, GE attempted but was unable to locate additional stained soil within the excavation sidewall. As a result, it was necessary to collect a representative sample of the stained materials from excavated soils that had been staged in a truck prior to transport to GE's Building 65.



The sample was sent for analysis of PCBs, volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs). A summary of the analytical results from this sample is provided in Table 1. As indicated in Table 1, 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 GE would submit a soil sampling and analysis plan intended to delineate the potential vertical and horizontal extent of the stained materials, as well as further characterize the nature of the staining.

### **Proposed Soil Sampling Plan**

GE proposes to collect bank soil borings in an iterative program at up to six locations (see Figure 2), for potential analysis of PCBs, VOCs and SVOCs, as well as total petroleum hydrocarbons (TPH). The proposed locations and/or the associated analyses have been selected to; 1) characterize the nature of the stained materials encountered during the bank soil removal activities discussed above; 2) delineate the potential extent of similarly stained/impacted bank soils; and 3) identify potential sources of the staining. The following is a summary of the proposed locations and related analyses:

- Three borings (SL-PILOTBANK-1, -2, and -3) will be installed to a depth of 3 feet within or adjacent to the general area of staining as illustrated on Figure 2. Each boring will be visually inspected for the presence of stained materials. If stained materials are encountered, sub-samples of the stained materials will be collected and analyzed for PCBs, VOCs, SVOCs, and TPH.
- Up to three additional borings (SL-PILOTBANK-4, -5, and -6) will be installed in an approximate radial pattern further away from the location of any of the initial borings where stained materials (if any) are encountered. If any such additional borings are necessary, they will be installed to similar depths as the initial borings (i.e., the same approximate elevation at the bottom of the boring). Each of these borings will be visually inspected for the presence of stained materials and, as above, if stained materials are encountered, sub-samples will be collected and analyzed for PCBs, VOCs, SVOCs, and TPH.

All field and analytical activities conducted will be performed in accordance with GE's approved Field Sampling Plan/Quality Assurance Project Plan (most recently revised in March 2007). PCB analysis will be performed in accordance with EPA's SW-846 Method 8082. TPH analysis will be performed in accordance with MDEP's "Method for the Determination of Extractable Petroleum Hydrocarbons" (MDEP-EPH/VPH-98-1). Analysis for VOCs and SVOCs will be performed in accordance with EPA's SW-846 Method 8260 and 8270, respectively.

### **Schedule**

GE anticipates installation of the borings discussed above within 2- to 3-weeks of EPA approval of this proposal. Note that, as discussed, these proposed locations are in the vicinity of the Pilot Study area; as such, it may be necessary to adjust actual sample locations to avoid disturbances to any equipment or other facilities related to ongoing monitoring of the Pilot Study cap. GE will coordinate with EPA regarding specific sample collection locations, and the scheduling of sample collection field activities following approval of the proposed plan. Upon receipt of analytical results, GE will discuss with EPA the need for any additional borings or sample collection activities. Within 45 days of receipt of all analytical results or completion of the boring program (if samples are not submitted for analysis), GE will prepare and submit a brief summary report

presenting the results, as discussed above, and discussing the nature and extent of any stained soils (if any), and any associated remedial actions within Recreational Area 4.

Please contact me with questions or comments.

Sincerely,



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

ATS/dmn  
Attachments

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James Nuss, ARCADIS BBL  
Stuart Messur, ARCADIS BBL  
Mark Gravelding, ARCADIS BBL  
James Bieke, Goodwin Procter  
Public Information Repositories  
GE Internal Repositories

\* *without attachments*



**Table**

**TABLE 1**  
**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
<b>Volatile Organics</b>		
None Detected		--
<b>PCBs</b>		
Aroclor-1254		7.3
Aroclor-1260		2.1
Total PCBs		9.4
<b>Semivolatile Organics</b>		
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. limit.
5. Only detected constituents are summarized.  
-- Indicates that all constituents for the parameter group were not detected.

Data Qualifiers:

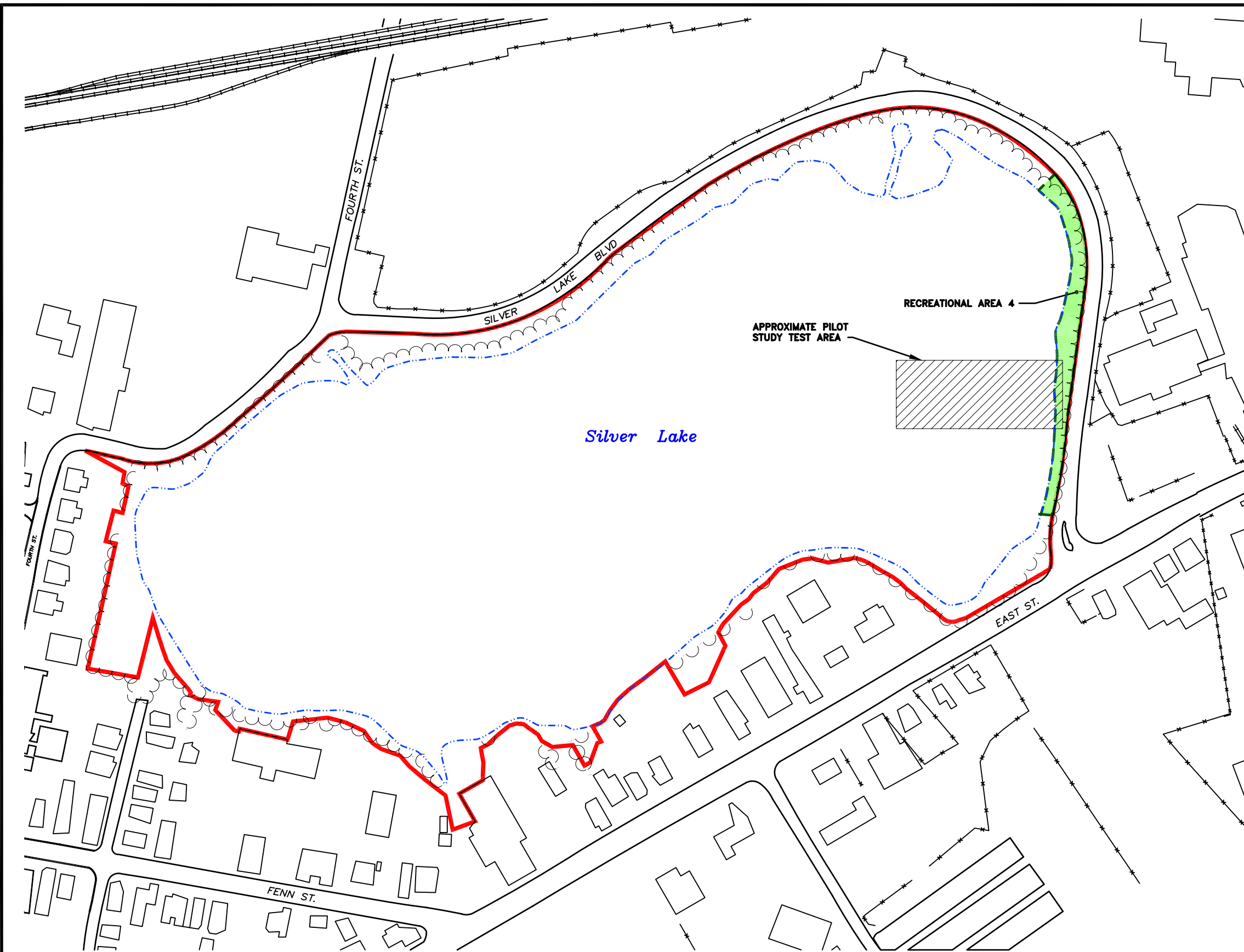
Organics (PCBs, volatiles, semivolatiles)

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







**Figures**



SYR-85-LJP\_PGL\_PRO\_LAYER: ON=\*, OFF=REF\*, JPL, PROPERTY-COMMON  
G:\CAD\GE-CAD\GE\_ACTIVE\C\40152002\PILOT\40152002.DWG SAVED: 3/16/2007 4:03 PM LAYOUT:1 PAGES:1 PAGESETUP:----- PENTABLE:PLFULL-CTB PRINTED:5/4/2007 2:27 PM BY:POSTROWSKI  
PROJECTNAME:-----  
XREFS: IMAGES:-----  
40152X02

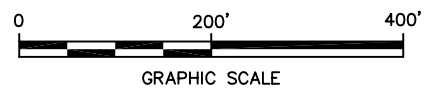


**LEGEND:**

-  MEAN WATER ELEV (975.9) (APPROX.)
-  RAILROAD
-  VEGETATION
-  APPROXIMATE LIMIT OF SILVER LAKE LAKE SOILS RAA BOUNDARY
-  RECREATIONAL AREA 4
-  APPROXIMATE PILOT STUDY TEST AREA

**NOTE:**

1. 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.



GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
**PILOT STUDY BANK SOIL REMOVAL**

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**SILVER LAKE AREA SITE MAP**

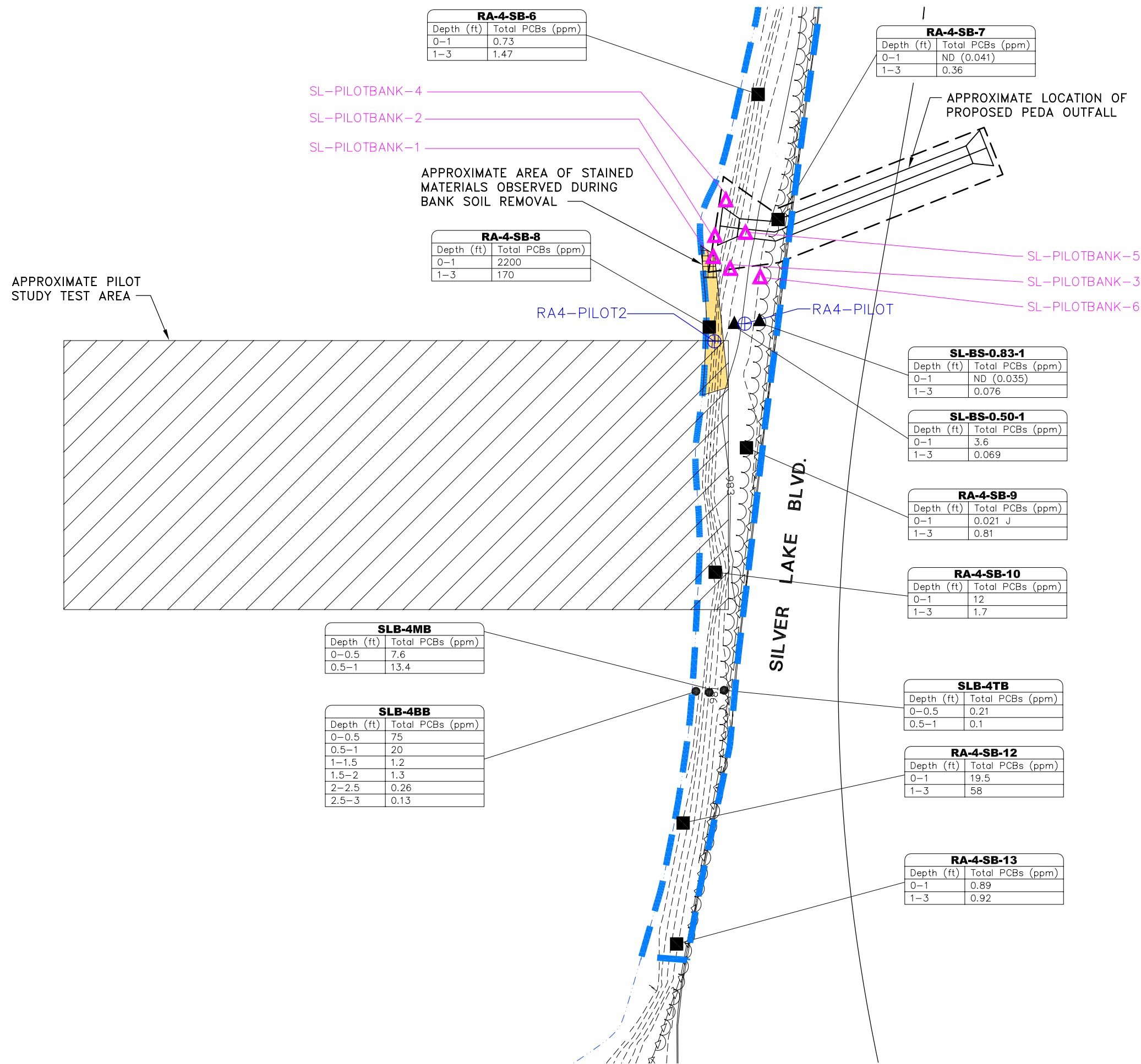
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FIGURE  
**1**



SYB-85-UP WLS PRO LAYER: ON=\*, OFF=REF (FRZ)  
 G:\CAD\GE-CAD\GE\_ACTIVE\C\40152002\PILOT\40152004.DWG  
 PENTABLE-PI FULL.CTB PRINTED: 5/4/2007 2:45 PM BY: POSTROWSKI  
 LAYOUT: 2 PAGES: 2/2 SAVED: 5/4/2007 2:32 PM GRAPHIC SCALE



**RA-4-SB-6**

Depth (ft)	Total PCBs (ppm)
0-1	0.73
1-3	1.47

**RA-4-SB-7**

Depth (ft)	Total PCBs (ppm)
0-1	ND (0.041)
1-3	0.36

**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

**RA-4-SB-9**

Depth (ft)	Total PCBs (ppm)
0-1	0.021 J
1-3	0.81

**RA-4-SB-10**

Depth (ft)	Total PCBs (ppm)
0-1	12
1-3	1.7

**SLB-4MB**

Depth (ft)	Total PCBs (ppm)
0-0.5	7.6
0.5-1	13.4

**SLB-4BB**

Depth (ft)	Total PCBs (ppm)
0-0.5	75
0.5-1	20
1-1.5	1.2
1.5-2	1.3
2-2.5	0.26
2.5-3	0.13

**SLB-4TB**

Depth (ft)	Total PCBs (ppm)
0-0.5	0.21
0.5-1	0.1

**RA-4-SB-12**

Depth (ft)	Total PCBs (ppm)
0-1	19.5
1-3	58

**RA-4-SB-13**

Depth (ft)	Total PCBs (ppm)
0-1	0.89
1-3	0.92



**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
- PROPOSED SAMPLE LOCATION FOR DELINEATION OF STAINED SOILS
- APPROXIMATE AREA OF BANK SOIL REMOVAL
- APPROXIMATE AREA OF STAINED MATERIALS ENCOUNTERED DURING BANK SOIL REMOVAL ACTIVITIES
- APPROXIMATE PILOT STUDY TEST AREA

**NOTES:**

1. 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.
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**  
**PROPOSED SOIL SAMPLING PLAN FOR STAINED MATERIALS ADJACENT TO PILOT STUDY AREA**

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infrastructure, environment, facilities

FIGURE  
**2**