

Memorandum

01-0348



To: Samuel I. Gutter, Esq.
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Cc: Bryan Olson, EPA
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From: Dr. Teresa S. Bowers
Gradient Corporation, consultant to
the Pittsfield Economic Development Authority

Subject: Request for Additional Samples Underneath Building
Foundations in the 20s, 30s, and 40s complexes

SDMS 214502
Date: December 18, 2000

DEC 29 2000

GE CORPORATE
ENVIRONMENTAL PROGRAMS

Pursuant to Sections VII.D and VII.E of the Definitive Economic Development Agreement, the Pittsfield Economic Development Authority ("PEDA") hereby requests that General Electric Company ("GE") take fifteen (15) additional soil samples, as specified below, in connection with its pre-design investigation of the 20s, 30s, and 40s complexes.

The Statement of Work for Removal Actions Outside the River ("SOW") establishes specific requirements for soil sampling at the GE Plant Area. The applicable requirements include the following:

- For unpaved areas, soil samples must be collected within an approximate 100 foot grid pattern, accounting for existing useable data. At each location, samples must be collected and analyzed to represent the 0 – 1, 1 – 6, and 6 – 15 foot depth intervals.
- For paved areas, soil sampling and analysis must be conducted with the objective of collecting samples at an approximate frequency of 170 borings for 110 paved acres (approximately two locations per paved acre). Samples must be collected from the same depth intervals as specified for unpaved areas.

In accordance with these requirements, GE intends to collect an additional 287 samples from 93 new locations. See June 2000 Pre-Design Investigation Workplan for Removal Actions for the 20s, 30s, and 40s Complexes. Ten of these samples will be collected from underneath existing building foundations, an area of approximately 8 acres. Samples proposed by GE are shown in Table I.

No separate sampling requirements apply specifically to building foundations. However, PEDA's concerns with contaminant concentrations underneath building foundations are different from other paved

areas since there may be future construction activities on the building slabs that require excavation beneath them. Additionally, adequate information will be needed to obtain environmental and health insurance coverage for the new buildings at commercially reasonable rates. Based on these concerns and the soil sampling requirements for paved areas set forth in the SOW, PED A requests 15 additional samples underneath the building foundations of the 20s, 30s, and 40s complexes. These additional samples ensure that each building foundation has a minimum of one sample beneath it and larger foundations have 2 or more samples per acre. The additional samples locations requested are outlined in Table 2 and shown in Figure 1.

Table 1: GE Proposed Sampling Underneath Building Foundations

Proposed Samples	Proposed Sampling Depths		
	0-1 ft.	1- 6 ft.	6-15 ft.
30s Complexes			
RAA2-26	A	P	P
RAA2-27	A	P	P
RAA2-28	P	P	A
RAA2-23	P	A	P
RAA2-22	P	P	A
RAA2-20	A	P	P
RAA2-42	P	A	P
40s Complexes			
RAA1-15	P	A	P
RAA1-16	A	P	P
RAA1-11	P	P	A

Notes: P - Soil sample proposed for PCB analysis
 A - Soil sample proposed for PCB and Appendix IX+3 analysis

Table 2: Additional Sampling Requested by PED A

	Sample Location	Number of Requested Samples
20s Complex	Building 25	1
	Building 29-B	1
30s Complex	Building 33	3
	Building 33-A	1
	Building 33-X	1
	Building 34	1
40s Complex	Building 42	3
	Building 43	2
	Building 44	2

The additional samples requested should comply with the SOW requirements stating that at each location samples should be analyzed to provide coverage from 0 - 1, 1 - 6, and 6 - 15 foot depth intervals.

Additionally, approximately one-third of all the requested samples should be analyzed for Appendix IX+3 constituents with approximately half of these samples coming from the 0 – 1 foot depth interval.