

March 19, 2002

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 December 2001 submittal titled *Conceptual Removal Design/Removal Action Work Plan for the 20s, 30s and 40s Complexes and supplements to the Work Plan, General Electric (GE) Housatonic River Project Site, Pittsfield, Massachusetts.***

Dear Mr. Silfer:

The Environmental Protection Agency (EPA) has reviewed the above-referenced *Conceptual Removal Design/Removal Action Work Plan for the 20s, 30s and 40s Complexes*, which was submitted by GE in December 2001, as well as three related documents subsequently submitted by GE: (1) a February 7, 2002 submittal titled *20s, 30s, and 40s Complexes – Revised PCB Spatial Averaging Tables*; (2) a February 15, 2002 submittal titled *20s, 30s, and 40s Complexes – Addendum to Conceptual RD/RA Work Plan*; and (3) a March 4, 2002 submittal titled *20s, 30s, and 40s Complexes – Revised Risk Evaluation of Appendix IX+3 Constituents in Soils*. These documents are referenced to collectively in this letter as the "Work Plan."

The Work Plan 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 Work Plan subject to the following conditions:

Conditions

1. A total of 12 volatile organic compounds (VOCs) and 21 semi-volatile organic compounds (SVOCs) exceed the Preliminary Remediation Goals (PRGs) based entirely on elevated detection limits. The data can be summarized as follows:
 - Only 5 of the 33 compounds were detected in any soil sample,
 - For these 5 compounds, the detection frequency was very low (4/28 was the highest detection frequency – the other four were 1/61 or less),
 - Only 5 of the 33 compounds have been detected at the site before, based on historical data: dibenzo(a,h)anthracene, indeno(1,2,3-cd)pyrene, 1,2-dichloroethane, carbon tetrachloride, and vinyl chloride.

GE has conducted resampling for these constituents in soils at selected locations in the 20s, 30s, and 40s Complexes to evaluate if lower analytical detection limits could be achieved for the VOCs and SVOCs in question. The results were presented in GE's February 15, 2002 Addendum to the Conceptual RD/RA Work Plan (Addendum). As reported in that document, the analyses of these supplemental samples were able to achieve significantly lower analytical detection limits – including for the 5 above-listed compounds that were previously detected at the site. Even with these lower

detection limits, the constituents in question were not detected in soil (except for one constituent, dibenzo(a,h)anthracene, in one sample, which was detected at a level below the applicable PRG). In consideration of these results, EPA concurs with GE's conclusion that there is no need for further sampling or evaluation for these constituents at the 20s, 30s and 40s Complexes.

2. EPA concurs with GE proposal in the Addendum to use the Practical Quantitation Limits (PQLs) as "screening PRGs" in future evaluations of the following five Appendix IX+3 constituents at other RAAs rather than the EPA Region 9 PRGs: (1) Benzidine; (2) N-Nitrosodiethylamine; (3) N-Nitrosodimethylamine; (4) N-Nitroso-di-n-butylamine; and (5) N-Nitrosomethylethylamine. The use of PQLs rather than EPA Region 9 PRGs in future RAA evaluations shall only apply to these five constituents at specific Removal Action Areas (RAAs), where the constituents have not been detected in soil. If any of the five constituents are detected at a specific RAA, the original EPA Region 9 PRG value will be used for the evaluation of that constituent, as specified in the CD.
3. GE has proposed to use a portion of the Appendix IX+3 background data set presented in the GE Background Soil Data Assessment for the GE-Pittsfield/Housatonic River Site, dated December 15, 2000 to compare against the detected concentrations of sulfide at the 20s, 30s, and 40s Complexes. EPA has never approved this background submittal. The sulfide background data subset described by GE on page 4-10 and presented in Table 4-10 is unacceptable.

As an alternative to utilizing the sulfide background data, GE shall use the most conservative residential and industrial EPA Region 9 PRG values available for a specific sulfide compound in its Appendix IX+3 evaluations. Carbon disulfide is the only sulfide compound for which there are EPA Region 9 PRGs for soil. Therefore, GE shall use the residential and industrial EPA Region 9 PRG values for carbon disulfide as "screening PRGs" for sulfide in this and future Appendix IX+3 constituent evaluations.

4. The Consent Decree does not provide industrial exposure scenarios for the 0- to 15-foot depth interval. For the non-PCB risk evaluation, GE proposes to evaluate this depth interval using Massachusetts Contingency Plan (MCP) Upper Concentration Limits (UCLs). Considering the lack of an industrial exposure scenario for the 0- to 15-foot soil depth interval in the CD, EPA concurs with GE's proposed approach.
5. In Subsection 4.3.5 (page 4-10), GE compares the arithmetic average concentrations of various Appendix IX+3 compounds against the MCP Method 1 S-2 and S-3 category soil standards. Although the Statement of Work for Removal Actions Outside the River (SOW) states in Attachment F on page 5 of 11 that, "The specific averaging approach and rationale for it will be presented in the RD/RA..." GE has not provided the rationale for using the arithmetic average. EPA does not consider this to be an issue for the 20s, 30s, and 40s Complexes, but GE shall present EPA with a rationale for its choice of spatial averaging approach, subject to EPA review and approval, in future RD/RA documents for other RAAs.

EPA reserves its right to perform additional sampling in the area subject to the *Conceptual Removal Design/Removal Action Work Plan for the 20s, 30s and 40s Complexes* Removal Action and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the Consent Decree.

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

Sincerely,

Michael Nalipinski
GE Facility Project Manager

Attachments

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