GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Federal Express

August 10, 2006

Ms. Sharon Hayes
United States Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, MA 02114-2023

Re: GE-Pittsfield/Housatonic River Site
30s Complex (GECD120)
Demolition and Disposition Activities – Building 32 Substation

Dear Ms. Hayes:

The General Electric Company (GE) has prepared this letter to identify its plans to demolish the Building 32 Substation (including an associated transformer) located within the former 30s Complex Removal Action Area (RAA) at GE's Pittsfield facility and to seek the U.S. Environmental Protection Agency's (EPA's) approval of GE's plans for the consolidation of certain debris resulting from that demolition activity. The 30s Complex Removal Action was completed in full satisfaction of the applicable requirements of the Consent Decree (CD), as documented in the *Final Completion Report For the 30s Complex Removal Action* (BBL, March 2005). The 30s Complex parcel was transferred to the Pittsfield Economic Development Authority (PEDA) in May 2005. GE plans to initiate demolition of the Building 32 Substation in the upcoming months as part of an agreement with PEDA, which will allow for the decommissioning of an electrical utility corridor network within the 30s Complex, on which an easement is currently reserved. As building demolition activities themselves are not part of the Removal Actions under the CD and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW), this letter presents a general description of GE's anticipated demolition activities for this building for informational purposes. However, this letter presents, for EPA approval, GE's proposed plans for the consolidation of certain building demolition debris at GE's on-plant consolidation areas (OPCAs).

Pre-Demolition Characterization Activities

GE performed pre-demolition characterization activities for the Building 32 Substation in July 2006. That program involved the collection of samples from brick walls from four locations for analysis of polychlorinated biphenyls (PCBs), as well as collection of one composite sample of brick wall materials for Toxicity Characteristic Leaching Procedure (TCLP) analysis of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and metals. In addition, the program involved the collection of one oil sample from a transformer located west of the Building 32 Substation (adjacent to the Western Massachusetts Electric Company property on Silver Lake Boulevard) for analysis of PCBs, as this transformer will also be decommissioned and removed as part of the demolition activities. The July 2006 characterization activities were performed consistent with the procedures summarized in the document titled *Protocols for Building Demolition and Associated Characterization Activities* (Demolition Protocols), the most recent version of which was submitted to EPA in July 2003 (as Exhibit A-1 to

Attachment A to GE's *Project Operations Plan* [POP], incorporating modifications previously approved by EPA).

Under the Demolition Protocols, initial characterization sampling of building materials subject to demolition (with the exception of wood block flooring and structural steel) is performed using an area-based approach, requiring the collection of one sample for every 5,000 square feet of floor area for analysis of PCBs and one composite sample for every 50,000 square feet of floor area for TCLP analysis. In addition, the Demolition Protocols provide the minimum number of samples that must be collected per floor of each building for PCB and TCLP analyses to determine if the building materials are suitable for disposition at the OPCAs. The July 2006 characterization sampling activities were performed in accordance with these Demolition Protocols, with the exception that no samples were collected from the at-grade concrete slab of the Building 32 Substation because the slab will be left in place following demolition and site restoration activities. Please also note that the Building 32 Substation spans approximately 2,500 square feet in total floor area, which, under the Demolition Protocols, only requires the collection of one sample for PCB analysis. However, as a conservative approach, four building material samples were collected in equally distributed locations throughout the building for PCB analysis, in order to gain a more spatial representation of the building materials.

The analytical results of the July 2006 sampling activities, which were provided in the CD Monthly Status Report for July 2006, are summarized in Tables 1 and 2. A review of the data from the July 2006 characterization event indicated that PCBs were detected at total concentrations ranging from 0.11 to 0.59 parts per million (ppm) in the building materials. None of the results for the sample collected for TCLP analysis exceeded the TCLP regulatory limits specified in EPA's regulations under the Resource Conservation and Recovery Act (RCRA). Therefore, the demolition debris generated from the Building 32 Substation is considered suitable for consolidation at GE's Hill 78 OPCA. GE's proposal concerning disposition of materials in the Hill 78 OPCA is presented below.

With regard to the oil sample collected from the transformer located west of the Building 32 Substation, the corresponding laboratory analysis indicated no detection of PCBs. As a result, the oil from this transformer will be properly drained, containerized, and transported to an appropriate off-site disposal facility. The remaining transformer carcass will be properly characterized, processed, and also transported to an appropriate off-site disposal facility.

Demolition of the Building 32 Substation

Following completion of pre-demolition activities (e.g., asbestos abatement, equipment and liquids removal, removal of loose lead-based paint, etc.), the building will be demolished using conventional construction equipment and practices, with appropriate dust control measures performed during the demolition activities. At this time, it is anticipated that the existing concrete slab-on-grade floor of the Building 32 Substation will be left intact.

Building Demolition Material Disposition

Based on the attached characterization information (Tables 1 and 2), GE proposes to consolidate the demolition debris from the Building 32 Substation at the Hill 78 OPCA. As discussed above, the information in Tables 1 and 2 indicates that the demolition material from the Building 32 Substation meets the standards in the CD and SOW for consolidation at the Hill 78 OPCA (i.e., total PCB concentrations below 50 ppm and no material that would constitute hazardous waste under RCRA).

Consolidation of the demolition debris at the Hill 78 OPCA will be conducted consistent with the provisions contained in the CD and SOW regarding use of the Hill 78 OPCA, as well as the Demolition Protocols. Specifically, GE will not consolidate at the Hill 78 OPCA free liquids, intact drums or other equipment that contain liquid PCBs, or asbestos-containing material required by applicable law to be removed from structures prior to demolition. Materials deemed unsuitable for placement at the Hill 78 OPCA, including the deenergized transformer, will be transported to an appropriate off-site disposal facility. Therefore, the type of demolition debris subject to consolidation at the Hill 78 OPCA is anticipated to include concrete, brick, structural steel, and other building demolition debris. The transport, handling, placement, and grading of the demolition debris at the Hill 78 OPCA will be performed in accordance with all applicable OPCA requirements, including GE's *2006 Addendum to OPCA Work Plan.*

Based on the above, GE requests EPA's approval for GE's plan to consolidate the demolition debris associated with the Building 32 Substation at the Hill 78 OPCA. Following EPA's approval, GE will finalize its project planning and proceed with the demolition and subsequent site restoration of the Building 32 Substation.

If EPA has any comments or questions concerning this letter, please contact me at your earliest convenience.

Sincerely,

Michael Carroll /MPH

Michael T. Carroll
Manager, Pittsfield Remediation Programs

DJH/cmb
Attachments

cc: T. Conway, EPA
D. Tagliaferro, EPA
H. Inglis, EPA
R. Howell, EPA*
S. Steenstrup, MDEP (2 copies)
J. Rothchild, MDEP*
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K.C. Mitkevicius, USACE
L. Palmieri, Weston (2 copies)
Mayor J. Ruberto, City of Pittsfield
Pittsfield Commissioner of Public Health
T. Hickey, Director, PEDA
N.E. Harper, MA AG*
D. Young, MA EOEA*
J. Bernstein, Bernstein, Cushner & Kimmel*
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R. McLaren, GE*
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J. Nuss, BBL
GE Internal Repositories
Public Information Repositories

(* without attachments)

Tables

BBL®

an ARCADIS company

TABLE 1
PCB DATA RECEIVED DURING JULY 2006

BUILDING 32 SUBSTATION SAMPLING
20s, 30s, 40s COMPLEX
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in parts per million, ppm)

Sample ID	Matrix	Date Collected	Aroclor-1016	Aroclor -1221, -1232, -1242, -1248	Aroclor-1254	Aroclor-1260	Total PCBs
SUB32-EW-1	Solid	7/19/2006	ND(0.030)	ND(0.030)	0.36	0.23	0.59
SUB32-NW-1	Solid	7/19/2006	ND(0.030)	ND(0.030)	0.065	0.045	0.11
SUB32-SW-1	Solid	7/19/2006	ND(0.031)	ND(0.031)	0.097	0.055	0.152
SUB32-WW-1	Solid	7/19/2006	0.039	ND(0.030)	ND(0.030)	0.21	0.249
T31-4-OIL-1	Oil	7/19/2006	ND(0.92)	ND(0.92)	ND(0.92)	ND(0.92)	ND(0.92)

Notes:
1. Samples were collected by BBL, an ARCADIS company, and submitted to SGS Environmental Services, Inc. for analysis of PCBs.
2. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.
3. Solid matrix samples are presented in dry weight.

TABLE 2
TCLP DATA RECEIVED DURING JULY 2006

BUILDING 32 SUBSTATION SAMPLING
20s, 30s, 40s COMPLEX
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in parts per million, ppm)

Parameter / Sample ID: / Date Collected:	TCLP Regulatory Limits	SUB32-WC-1 7/19/2006
Volatile Organics		
1,1-Dichloroethene	0.7	ND(0.010)
1,2-Dichloroethane	0.5	ND(0.010)
1,4-Dichlorobenzene	7.5	ND(0.010)
2-Butanone	200	ND(0.25)
Benzene	0.5	0.026
Carbon Tetrachloride	0.5	ND(0.010)
Chlorobenzene	100	ND(0.010)
Chloroform	6	ND(0.010)
Tetrachloroethene	0.7	ND(0.010)
Trichloroethene	0.5	0.019
Vinyl Chloride	0.2	ND(0.010)
Semivolatile Organics		
1,4-Dichlorobenzene	7.5	ND(0.010)
2,4,5-Trichlorophenol	400	ND(0.010)
2,4,6-Trichlorophenol	2	ND(0.010)
2,4-Dinitrotoluene	0.13	ND(0.010)
Cresol	200	ND(0.010)
Hexachlorobenzene	0.13	ND(0.010)
Hexachlorobutadiene	0.5	ND(0.010)
Hexachloroethane	3	ND(0.010)
Nitrobenzene	2	ND(0.010)
Pentachlorophenol	100	ND(0.050)
Pyridine	5	ND(0.010)
Inorganics		
Arsenic	5	ND(0.200)
Barium	100	2.04 B
Cadmium	1	ND(0.100)
Chromium	5	0.0255 B
Lead	5	ND(0.100)
Mercury	0.2	ND(0.000570)
Selenium	1	0.203
Silver	5	ND(0.100)

Notes:
1. Sample was collected by BBL, an ARCADIS company, and submitted to SGS Environmental Services, Inc. for analysis of TCLP constituents.
2. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.

Data Qualifiers:

Inorganics
B - Indicates an estimated value between the instrument detection limit (IDL) and practical quantitation limit (PQL).