

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1 1 CONGRESS STREET, SUITE 1100 BOSTON, MASSACHUSETTS 02114-2023 SDMS 258053

September 5, 2001

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 "June 2001 Demolition/Consolidation Work Plan for Buildings 31, 31-J, and 31-P" including Supplemental Information provided on August 28, 2001

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above referenced "June 2001 Demolition/Consolidation Work Plan for Buildings 31, 31-J, and 31-P" including the supplemental information that GE provided on August 28, 2001. These documents are subject to the terms and conditions specified in the Consent Decree that was entered in Federal District Court on October 27, 2000 (the "Consent Decree").

The original proposal combined with the supplemental information adequately addresses the EPA and Massachusetts Department of Environmental Protection's (MADEP) concerns which were conveyed to GE in several telephone call, meetings, and a site visit.

Pursuant to Paragraph 73 of the Consent Decree, the EPA, after consultation with MADEP, approves the above referenced submittal subject to the following conditions:

Conditions:

- 1. GE shall remove sediments, clean, and fill all sumps/elevator shafts depicted on Figure 1 "Building 31 Basement Floor Elevations" (August 28, 2001) with either grout or concrete. Additionally, all floor elevations lower than 980.00 ft (AMSTL) shall be either grouted or cemented to 980.00 ft or higher. This action is necessitated to minimize the potential of groundwater infiltrating into the basement of the consolidation cell.
- 2. Condition #1 does not apply to the room at the western edge of the Building 31 foundation where the entrance to the ash tunnels are. GE shall construct a concrete wall separating the Powerhouse basement and the room leading to the ash tunnels. The ash tunnel room shall be filled with construction debris (less than 200 ppm PCBs) to ground surface. The Building 31 cap shall extend to cover this area.
- 3. GE shall also cut, concrete or grout the storm/floor drains, water intakes, electrical conduits

as identified on Figure 3 Section 4 "Building 31 Basement Tunnels" (June 2001) in order to mitigate potential groundwater infiltration into the consolidation cell.

- The Agencies accept GE's proposal to install a downgradient monitoring well at the 4. southwest corner of Building 31 as depicted on Figure 2 of the August 2001 supplemental document. This new well shall be monitored as a GW-3 sentinel source well and be included in the GMA - 1 baseline program.
- 5. If excess space exists within the foundation after consolidating Building 31 the Agencies would allow consolidation of other construction debris from other buildings within the 30s Complex. The additional material must comply with Hill 78 consolidation requirements e.g., less than 50 ppm PCBs and no TCLP exceedances.
- 6. GE shall ensure that the material placed in the foundation prior to installation of the cap shall be adequate to ensure integrety of the cap.
- The cap on to of the Building 31 OPCA shall extend, at a minimum of, two feet beyond the 7. foot print of the foundation wall. This requirement also includes the room discussed in Condition 2.

The EPA's approval of this submittal does not preclude EPA from requiring additional investigations and response activities, to the extent authorized, pursuant to the Consent Decree and the Scope of Work

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

Sincerely,

Michael Nalipinski GE Facility Leader

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