01-0700

Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue, Pittsfield, MA 01201

Transmitted Via Overnight Delivery

February 19, 2004

Michael Nalipinski
EPA Project Manager
U.S. Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Re: GE-Pittsfield/Housatonic River Site
Demolition and Disposition Activities - GE Building 40B *(GECD120)*

Dear Mr. Nalipinski:

In January 2004, the General Electric Company (GE) provided verbal notification to the U.S. Environmental Protection Agency (EPA) regarding GE's planned demolition of Building 40B located at GE's Pittsfield, Massachusetts facility (Figure 1). As a follow-up to that notification, this letter presents a general description of GE's anticipated demolition activities for this building. Since building demolition activities themselves are not part of the Removal Actions under the Consent Decree [CD] and the accompanying Statement of Work for Removal Actions Outside the River [SOW], specific EPA approval is not required for those activities. This letter does present for EPA approval a description of GE's plans for consolidation of the building demolition debris at GE's on-plant consolidation areas (OPCAs), as well as a description of GE's plans for backfilling and restoring the affected areas.

Existing Site Conditions

The Building 40B area consists of a GE-owned building that is a small above-grade building structure, as well as a larger below-grade vault. The above-grade structure is a one-story sheet metal building. The below-grade vault is constructed of steel-reinforced concrete (approximately 12 inches thick) and was formerly used to store No. 6 fuel oil for power production. The vault walls and floor are considered to be intact and the vault was cleaned out some years ago (including pressure washing of the concrete walls). The vault base extends approximately 12 to 15 feet below grade and the top of the vault varies from approximately 6 to 18 inches below grade. Based on design drawings, the former fuel oil storage capacity within the Building 40B vault is estimated to have been approximately 700,000 gallons. Neither the above-grade building nor the vault is equipped with water, sewer, gas, or storm drain lines, but the above-grade building is connected to an active steam line.

Characterization of the soils and groundwater in the vicinity of Building 40B has previously been performed, and the results were provided to EPA in the *Pre-Design Investigation Report for Removal Actions for 20s, 30s, and 40s Complexes* (March 2001), and subsequent Plant Site 1 Groundwater Management Reports (2002 & 2003), respectively. GE has reviewed the analytical data for soil and

groundwater samples provided in these reports and has found no indications of impacts to soil or groundwater due to the presence of the below-grade vault.

Demolition of Above-Grade Structure and Ancillary Features

Above-grade demolition activities will include the removal of the one-story sheet metal building, its associated concrete floor slab, and other ancillary site features such as piping, bollards, fencing, and light posts. The demolition activities will be performed consistent with the provisions in the 2003 document titled *Protocols for Building Demolition and Associated Characterization Activities* (Demolition Protocols).

Demolition/Abandonment of Below-Grade Vault

As indicated above, the Building 40B area also includes a subsurface concrete vault. GE will remove the concrete cover of the vault, as well as the upper portion of the walls to a depth below grade (i.e., approximately 18 inches) that is sufficient to facilitate installation of a subbase layer and asphalt pavement across the Building 40B area. The remaining interior surfaces of the vault will then be pressure washed as a general housekeeping measure and to remove residual debris that may be present on the interior surfaces. Washwater will be collected, containerized, and disposed of at GE's water treatment plant in Building 64G. The base of the vault will then be covered with approximately 1 foot of flowable fill to cushion the vault floor against impacts from backfill placement and compaction. The vault will then be filled with clean imported soil fill (i.e., backfill from a source that has been previously used for other response actions at the GE Plant Area). Following backfilling of the vault, bituminous asphalt pavement will be installed across the former Building 40B area.

The demolition and backfilling activities will be performed with appropriate ambient air monitoring and dust control measures.

Building Demolition Material Disposition

With respect to the disposition of the building demolition debris, GE is planning to consolidate the demolition debris from the Building 40B area at the Building 71 OPCA in accordance with the provisions contained in the CD and SOW regarding use of the OPCAs, as well as the Demolition Protocols. Since the Building 71 OPCA is designated for receipt of materials regardless of whether they are regulated by the Toxic Substances Control Act (TSCA) or constitute hazardous waste under the Resource Conservation and Recovery Act (RCRA), building characterization data for Building 40B are not necessary for consolidation of the debris from this building in that OPCA, provided that other prohibitions related to OPCA disposal are not encountered (discussed below).

Consolidation of demolition debris from these activities will be subject to the conditions in the CD and SOW for consolidation at the OPCAs. Specifically, GE will not consolidate at the OPCAs free liquids, intact drums or capacitors, equipment containing PCBs within its internal components, or asbestos-containing material required by applicable law to be removed from structures prior to demolition -- all of which will be disposed of at an appropriate off-site disposal facility. Therefore, the type of demolition debris subject to consolidation at the OPCAs is anticipated to include concrete, sheet metal, structural steel, and other demolition debris.

The transport, handling, placement, and grading of the demolition debris at the OPCAs will generally be performed in a manner consistent with GE's practices during other Brownfields demolition projects. Following EPA approval concerning the planned disposition of demolition debris, GE will finalize its project planning and prepare for the start of demolition activities in early March.

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

Sincerely,

John F. Novotny /WAR

John F. Novotny, P.E.
Manager – Facilities and Brownfields Programs

JFN/csc
Enclosure

cc: T. Conway, EPA
D. Tagliaferro, EPA
C. Tucker, EPA
H. Inglis, EPA
R. Howell, EPA
S. Steenstrup, MDEP (2 copies)
R. Bell, MDEP
T. Angus, MDEP
A. Symington, MDEP
K.C. Mitkevicius, USACE
D. Jamros, Weston
Mayor J. Ruberto, City of Pittsfield
T. Hickey, PEDA
J. Bernstein, Bernstein, Cushner & Kimmel
T. Bowers, Gradient
R. McLaren, GE
M. Carroll, GE
A. Silfer, GE
J. Bieke, Shea & Gardner
J. Nuss, Blasland, Bouck & Lee, Inc.
W. Rankin, Blasland, Bouck & Lee, Inc.
GE Internal Repositories
Public Information Repositories
(3 copies)

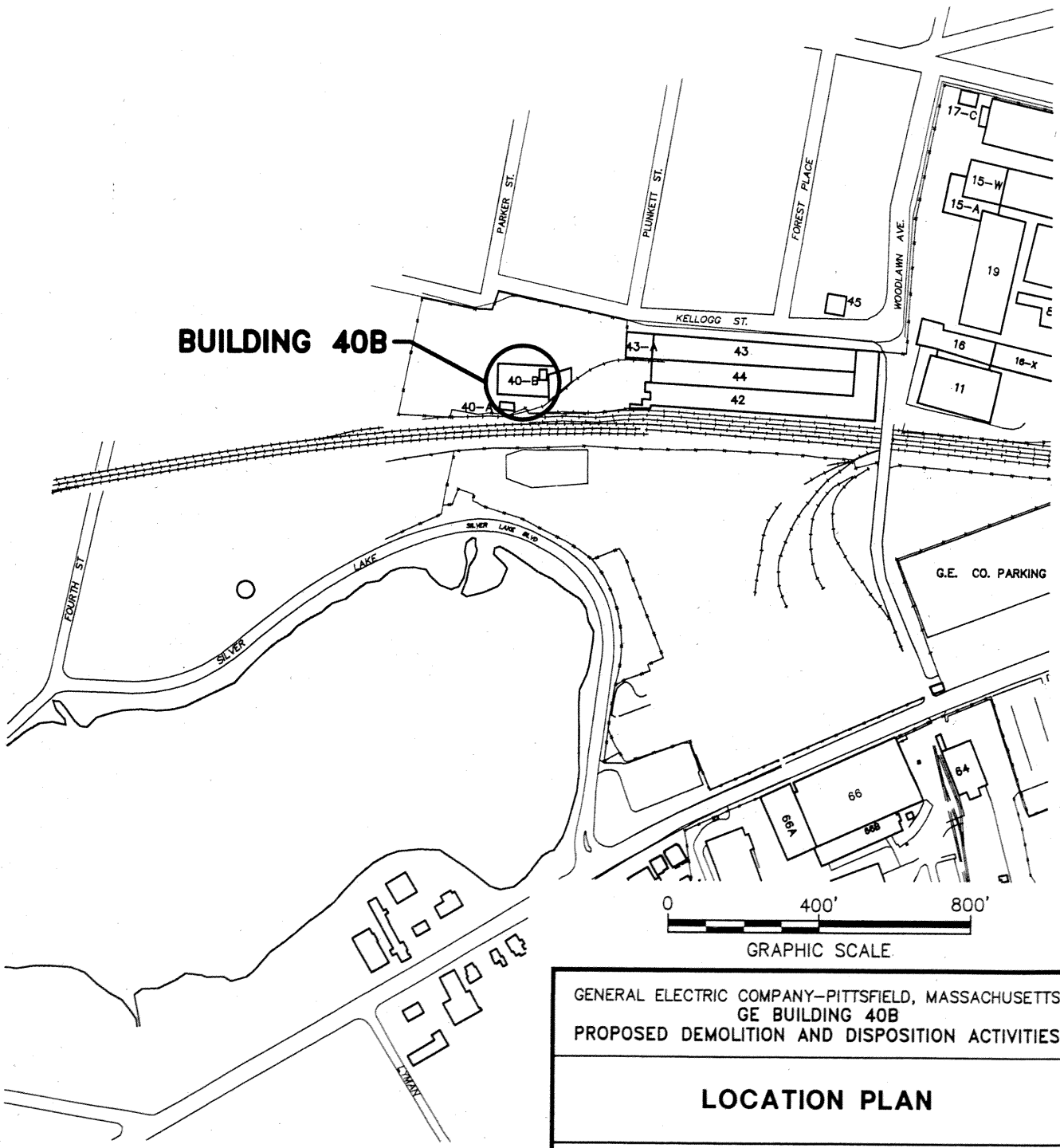
Figure 1

NOTES:

1. PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. – FLOWN IN APRIL 1990; AND DATA PROVIDED BY GENERAL ELECTRIC COMPANY.

2. NOT ALL PHYSICAL FEATURES ARE SHOWN.

3. ALL LOCATIONS ARE APPROXIMATE.



GENERAL ELECTRIC COMPANY–PITTSFIELD, MASSACHUSETTS
GE BUILDING 40B
PROPOSED DEMOLITION AND DISPOSITION ACTIVITIES

LOCATION PLAN

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
1

X: 20469X01.DWG
L: ON=* OFF=*REF*
P: PAGESET/PLT-AP
2/3/04 SYR-85-NES NES LAF
N/20469001/20469G01.DWG