WESTON Ref. No.
01-0367

Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue, Pittsfield, MA 01201 SDMS 275750

May 15, 2001

Bryan Olson
EPA Project Coordinator
U.S. Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Re: GE-Pittsfield/Housatonic River Site
Portion of East Street Area 2-South (GECD150): Future City Recreational Area
Addendum to Pre-Design Investigation Report

Dear Mr. Olson:

As you know, the General Electric Company (GE) recently conducted soil investigations within and adjacent to the portion of East Street Area 2-South referred to as the Future City Recreational Area. The results of these investigations were reported to the U.S. Environmental Protection Agency (EPA) in a document titled *Pre-Design Investigation Report for Portion of East Street Area 2-South: Future City Recreational Area* (Pre-Design Report; April 2001).

In the Pre-Design Report, GE identified the need for certain limited additional soil sampling in the northwest corner of this area. This data need was identified in response to the finding of elevated concentrations of certain semi-volatile organic compounds (SVOCs) in one subsurface soil sample collected within the Future City Recreational Area -- i.e., the 5- to 14-foot depth sample from location CRA-3 (see attached Figure 1). Although samples from this depth increment will be evaluated as part of the overall averaging area within East Street Area 2-South that contains the Future City Recreational Area (i.e., the former Gas Plant/Scrapyard Area), the results from that depth increment (in the absence of any sample results from shallower depths at that location) indicated the potential for elevated levels of SVOCs to be present in the overlying soils at that location. As a result, GE noted in the Pre-Design Report that it planned to collect soil samples from the 0- to 2-foot depth increment (which would correspond to the 1- to 3-foot depth increment after installation of the soil cover for the Future City Recreational Area) at three locations within that area – CRA-3 and nearby locations CRA-4 and CRA-23 (see Figure 1) – and to analyze the sample from CRA-3 for SVOCs, while retaining the others for possible future SVOC analysis depending on the results from the CRA-3 sample.

On April 27, 2001, GE collected soil samples from the 0- to 2-foot depth increment at sampling locations CRA-3, CRA-4, and CRA-23, as shown on attached Figure 1. The soil sample from location CRA-3 (as well as a duplicate sample) was analyzed for the SVOCs listed in Appendix IX of 40 CFR Part 264, plus benzidine and 1,2-diphenylhydrazine. The remaining soil samples from locations CRA-4 and CRA-23 were held by the laboratory pending an assessment of the results of the CRA-3 sample and duplicate.

The preliminary results of the SVOC soil data from CRA-3 (0- to 2-foot depth increment) are summarized in Table 1. Upon review of these results, in combination with the remaining SVOC data summarized in the Pre-Design Report, GE has preliminarily determined that, based on the configuration

of the Future City Recreational Area shown in the Pre-Design Report, soil removal to address SVOCs would not be necessary as part of the response actions for that area. Therefore, GE does not plan to analyze the 0- to 2-foot samples from CRA-4and CRA-23 at this time.

It should be noted, however, that, as a separate matter, GE is currently in the process of evaluating and discussing with the City of Pittsfield and EPA potential modifications to the configuration of the Future City Recreational Area. Such modifications may include an expansion of the limits of the Future City Recreational Area beyond the limits currently shown for that area in the Pre-Design Report. Such an expansion may require the performance of additional pre-design soil investigations outside the current limits of the area. If so, GE will prepare a Supplemental Pre-Design Investigation Work Plan for such additional sampling and will submit that plan to EPA for review and approval. Once that matter is resolved and any such additional sampling is conducted and the results received, GE will re-evaluate the need for further sampling and analysis within the overall Future City Recreational Area, including the need for further SVOC analysis for the northwest corner of the area.

Please call John Novotny or me if you have any questions regarding this letter or future activities related to the Future City Recreational Area.

Sincerely,

Andrew T. Silfer, P.E.
GE Project Coordinator

Enclosures
U:\MEG01\3171199.doc

cc: M. Nalipinski, EPA
T. Conway, EPA
H. Inglis, EPA
K.C. Mitkevicius, USACE
D. Veilleux, Weston
A. Weinberg, MDEP
R. Bell, MDEP
J.L. Cutler, MDEP (2 copies)
S. Steenstrup, MDEP
S. Keydel, MDEP
T. Angus, MDEP
C. Fredette, CDEP
Mayor G. Doyle, City of Pittsfield
Pittsfield Commissioner of Public Health
Director, PEDA
J. Bernstein, Bernstein, Cushner & Kimmel
T. Bowers, Gradient
N.E. Harper, MA AG
D. Young, MA EOEA
K. Finkelstein, NOAA
Field Supervisor, USFWS, DOI
M. Carroll, GE
J. Novotny, GE
R. McLaren, GE
J. Nuss, BBL
J. Bieke, Shea & Gardner
S. Gutter, Sidley & Austin
J. Porter, Mintz, Levin, Cohn, Ferris, Glovsky, & Popeo
Public Information Repositories
GE Internal Repositories

PRELIMINARY ANALYTICAL DATA
SUBJECT TO VERIFICATION

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

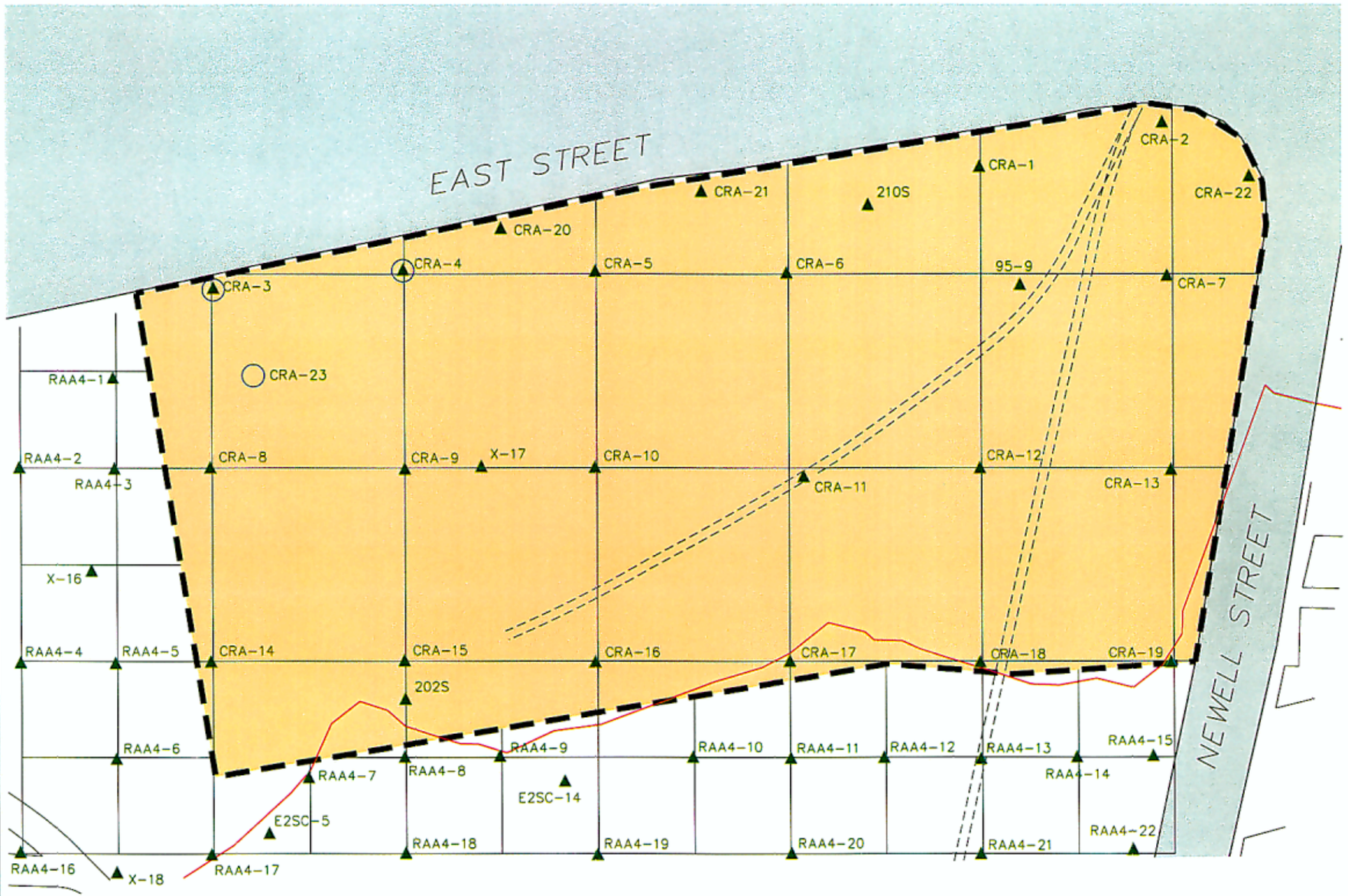
FUTURE CITY RECREATIONAL AREA
SOIL SAMPLING RESULTS FOR SVOCs

(Results are presented in dry weight parts per million, ppm)

Parameter	Sample ID: / Sample Depth(Feet): / Date Collected:	CRA-3 / 0-2 / 04/27/01
Semivolatile Organics		
Acenaphthene		ND(0.44) [0.63]
Acenaphthylene		ND(0.44) [0.44]
Anthracene		ND(0.44) [1.7]
Benzo(a)anthracene		0.60 [3.0]
Benzo(a)pyrene		0.60 [2.8]
Benzo(b)fluoranthene		0.54 [2.1]
Benzo(g,h,i)perylene		ND(0.44) [1.9]
Benzo(k)fluoranthene		0.51 [1.9]
Chrysene		0.54 [2.7]
Fluoranthene		1.2 [7.0]
Fluorene		ND(0.44) [0.84]
Indeno(1,2,3-cd)pyrene		ND(0.87) [2.1]
Naphthalene		ND(0.44) [0.83]
Phenanthrene		0.64 [7.5]
Pyrene		0.88 [6.2]

Notes:

1. Sample was collected by Blasland, Bouck & Lee, Inc., and was submitted to CT&E Environmental Services, Inc. for analysis of semivolatile organics. Only the constituents detected in the sample and/or duplicate are presented in this table.
2. ND - Analyte was not detected. The number in parentheses is the associated quantitation limit.
3. Duplicate sample results are presented in brackets.



LEGEND:

- APPROXIMATE LIMITS OF FUTURE CITY RECREATIONAL AREA (SUBJECT TO CHANGE)
- APPROXIMATE 100-YEAR FLOODPLAIN
- X-18 EXISTING SOIL SAMPLE LOCATION
- ADDITIONAL 0-2 FOOT SOIL SAMPLING LOCATION (SAMPLE CRA-3 ANALYZED FOR SEMI-VOLATILE ORGANIC COMPOUNDS)
- PAVED AREA
- UNPAVED AREA
- EXISTING ROAD ALIGNMENT

NOTES:

1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1990.
2. NOT ALL PHYSICAL FEATURES SHOWN.
3. SITE BOUNDARY IS APPROXIMATE.
4. ALL SAMPLING LOCATIONS ARE APPROXIMATE.
5. EXTENT OF VARIOUS SURFACE COVERS IS APPROXIMATE.
6. 100-YEAR FLOODPLAIN BOUNDARY IS BASED ON ELEVATIONS PUBLISHED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY: "FLOOD INSURANCE STUDY" - CITY OF PITTSFIELD, MASSACHUSETTS" JANUARY 16, 1987; AND "FLOOD INSURANCE RATE MAP - CITY OF PITTSFIELD, MASSACHUSETTS" (PANELS 250037 0010C AND 25037 0020C), FEBRUARY 19, 1982, AND TWO-FOOT CONTOUR TOPOGRAPHIC MAPPING GENERATED PHOTOGRAMETRICALLY IN 1990 AT A BASE SCALE OF 1:2,400.
7. LIMITS OF FUTURE MERRILL ROAD/EAST STREET ALIGNMENT ARE BASED ON BASE MAPPING PREPARED BY J.H. MAXYMILIAN, INC. ("JHM FURTHER DELINEATION SAMPLING" DATED 6/15/99).
8. ADDITIONAL 0-2 FOOT SOIL SAMPLES AT CRA-4 AND CRA-23 WERE NOT ANALYZED FOR SEMI-VOLATILE ORGANIC COMPOUNDS.

0 60' 120'

APPROXIMATE SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
PORTION OF EAST STREET AREA 2-SOUTH: FUTURE CITY RECREATIONAL AREA

SOIL SAMPLE LOCATIONS

BLASLAND, BOUCK & LEE, INC. engineers & scientists

FIGURE 1

L: ON=* OFF=*REF*
P: STD-PCP/BL
5/14/01 SYR-54-DMW NES RCB PGL
10111001/10111B06.DWG