



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1  
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BOSTON, MASSACHUSETTS 02114-2023

01-0609  
SDMS 44947

June 11, 2003

Mr. Andrew T. Silfer  
Corporate Environmental Programs  
General Electric Company  
100 Woodlawn Avenue  
Pittsfield, MA 01201

Via Electronic and U.S. Mail

**Re: Comments on General Electric Company's (GE) 29 April 2003 submittal *Removal Design/Removal Action Work Plan Addendum for the Future City Recreational Area*, General Electric (GE)-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.**

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Removal Design/Removal Action Work Plan Addendum for the Future City Recreational Area* (Work Plan). The Future City Recreational Area (FCRA) is a portion of the East Street Area 2-South Removal Action Area (RAA), also referred to as RAA 4 in project documents. This 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 submittal subject to the following conditions, and pending subsequent EPA review of the outstanding submittals noted in Section 8 of the Work Plan:

**Conditions**

1. In Subsection 6.5.1, GE indicates that the average depth to groundwater at the FCRA is between 17 and 22 ft below ground surface (bgs). However, EPA notes that soil borings advanced in the vicinity of the western edge of the FCRA encountered soils saturated with water and/or non-aqueous phase liquids (NAPL) above 15 ft bgs. This area is proposed for the location of the scorer's box and the footings for some of the outdoor lighting units. Attachment F contains a details sheet for the proposed athletic field, which includes light pole pier and footing details, but does not include scorer's box footing details. In the supplemental information package, these details shall be provided, and GE shall address the higher-than-average depth to groundwater and evidence of NAPL in this area of the FCRA, as it may affect construction.
2. In Subsection 6.5.2, GE indicates that soils removed as part of the FCRA construction will be disposed of in the Hill 78 On-plant Consolidation Area (OPCA). As noted in Comment 1 above, certain deep soils to be removed to construct piers and footings for the scorer's box and lighting fixtures in the western portion of the FCRA may contain NAPL or contaminated groundwater. In its supplemental information package, GE shall describe

how anomalous materials discovered during construction activities will be characterized and disposed of.

EPA reserves its right to perform additional sampling in RAA 4 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 J. Nalipinski

GE Facility Project Manager

cc: John Novotny, GE  
James Bieke, Shea & Gardner  
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