



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

01-0668
SDMS 201104

November 26, 2003

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 October 2003 **Conceptual Removal Design/Removal Action Work Plan for East Street Area 1-North**, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the conceptual remedial design/remedial action work plan described in the above-referenced **Conceptual Removal Design/Removal Action Work Plan for East Street Area 1-North** (CRD/RA Work Plan). The CRD/RA 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:

1. The CRD/RA Work Plan generally complies with the requirements stated in the CD and SOW. However, in Subsection 4.3.2 (page 4-6), GE points out a variety of evaluation issues related to the Appendix IX+3 constituents that are not covered specifically in the CD and SOW. In most cases, GE has proposed solutions to these evaluation issues in the CRD/RA Work Plan similar to those provided in previous RD/RA Work Plans. However, for two additional compounds (2-hexanone and N-nitrosopiperidine) detected in soil that have no established EPA Region 9 Preliminary Remediation Goals (PRGs).

The detection of the volatile organic compound (VOC) 2-hexanone (a.k.a, methyl butyl ketone) is associated with the detection of other VOCs (1,4-dichlorobenzene, 2-butanone (a.k.a, methyl ethyl ketone), bromoform, and xylenes) and PCBs at a depth of 8 to 10 ft at location RAA6-E6. As the sample location is located within 75 ft of a non-GE-owned building, GE shall evaluate the compound. The detection of the semi-volatile organic compound (SVOC) N-nitrosopiperidine is associated with the detection of a number of other SVOCs and PCBs at a depth of 1 to 3 ft at location RAA6-A11. As the sample location is located within 15 ft of a non-GE-owned building and is one of only two samples analyzed for Appendix IX+3 constituents from Parcel K11-1-15, GE shall evaluate the compound. As there are no EPA Region 9 PRGs or MCP Method 1 soil standards for 2-hexanone or N-nitrosopiperidine, GE may propose to use surrogate PRGs to evaluate these compounds, as it does for certain other specific compounds for which EPA Region 9 PRGs are not available. Such surrogate PRGs must be based on the EPA Region 9 PRGs for structurally similar

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compounds, provided that the PRG used for N-nitrosopiperidine is for a similar carcinogenic compound (e.g., N-nitrosopyrrolidine) and the PRG used for 2-hexanone (a.k.a. methyl butly ketone) is for a similar non-carcinogenic compound. If the maximum detected concentration of 2-hexanone or N-nitrosopiperidine exceeds the surrogate PRG, GE must evaluate such compound(s) further either by deriving a Method 2 standard using the MCP procedure for doing so or else by including such compound(s) in the area-specific risk evaluation for the area in question.

GE shall revise the CRD/RA Work Plan in accordance with the requirements listed above in this letter within six weeks from the date of this letter. That revised CRD/RA Work Plan shall include an evaluation of the need for a Final RD/RA Work Plan for this RAA, and if such a Final RD/RA Work Plan is needed, shall propose to submit that Work Plan to EPA within four months from the date of this letter. If a Final RD/RA Work Plan is not needed, the revised CRD/RA Work Plan shall propose a schedule for conducting a pre-certification inspection and preparing a Final Completion Report for this RAA in accordance with the CD and Statement of Work for Removal Actions Outside the River (Appendix E to the CD).

If there is any conflict between the Performance Standards as described in the Report and as set forth in the Consent Decree and/or Statement of Work for Removal Actions Outside the River (Appendix E to the Consent Decree), the Statement of Work shall control. EPA reserves its right to perform additional sampling in the areas subject to Proposal and/or require additional sampling or response actions, if necessary, pursuant to 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
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