



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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01-0517
SDMS 275738

August 29, 2002

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's May 2002 *Pre-Design Investigation Work Plan for the East Street Area 1-North Removal Action*, General Electric/Housatonic River Project Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the pre-design investigation activities for the above-referenced "*Pre-Design Investigation Work Plan for the East Street Area 1-North Removal Action*," (PDIWP). The PDIWP 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) and discussions with General Electric (GE) personnel, approves the above-referenced submittal subject to the following conditions:

General Conditions

Review of the PDIWP has identified a number of data gaps or inconsistencies that shall be addressed in an Addendum to the PDIWP.

1. In the PDIWP, GE defines the East Street Area 1-North (ESA1-N) Removal Action Area (RAA) as "bounded by a non-GE-owned railway property and right-of-way to the north, and Merrill Road to the west." The boundary of the ESA1-N RAA depicted in Figure 1 of the PDIWP does not match the boundary depicted in Figure 2-1 of the SOW. The Statement of Work for Removal Actions Outside the River (SOW), Appendix E to the CD, defines the ESA1-N RAA as "bounded by Merrill Road to the north and west;" and Figure 2-1 of the SOW depicts the ESA1-N RAA as including the railroad and Merrill Road right-of-ways. However, the SOW also states that paved public roadways will not be included in the RAAs, and Figure E-1 of the SOW (which shows averaging areas) depicts the ESA1-N RAA averaging area as not including either Merrill Road or the railroad tracks.

During discussions on August 14, 2002, EPA, MDEP, GE agreed to relocate the northern boundary of the RAA along a line generally parallel to, and extending in both directions from, a wall depicted on Figure 3 of the PDIWP in the vicinity of grid nodes C2, C3, and C4, and to collect additional samples along the northern portion of the RAA. In an Addendum to the

PDIWP, GE shall propose additional subsurface samples at locations RAA6-B7 (relocated to the northeastern corner of the GE-owned portion of the building), RAA6-A11, RAA6-C2 (relocated as needed to remain within the GE-owned portion of the RAA).

2. GE has agreed to include a summary of the available history of GE and non-GE uses and operations at the property, and a brief summary of the investigatory history in the PDIWP Addendum. This sort of background information is needed to assess the appropriateness of the proposed sampling locations and analyses.
3. GE proposes collecting samples RAA6-C4, RAA6-E1, RAA6-E2, RAA6-E3, RAA6-E4, and RAA6-E5 at locations offset from their grid nodes, as depicted in Figure 3 of the PDIWP. GE shall collect the following samples as close to their grid nodes as possible while remaining on GE-owned property: RAA6-E1 through -E4, and RAA6-C3 and -4.
4. GE has identified the locations of known utilities, and proposed to modify several polychlorinated biphenyl (PCB) grid-sampling locations to better characterize soil surrounding those utilities. As agreed to by GE, EPA and MDEP, samples used to characterize utility corridors are to be within a 50-foot band centered along the line of the utility (25 feet on either side), and distributed at a frequency of one sample per approximately 100 linear feet of utility. Information regarding the depth of the utility trench beds is not provided in the PDIWP. GE shall provide information regarding the depth of the utility trench beds in the PDIWP Addendum. In addition, GE shall convert surficial sample location RAA6-D10 to a subsurface boring location and convert subsurface boring sample location RAA6-D9 to a surficial sample location.
5. Based on EPA's review of historical uses of the properties comprising the RAA, GE shall modify the proposed Appendix IX+3 samples as follows:
 - 0-1 ft interval: Move RAA6-B17 to RAA6-A16, move RAA6-C5 to RAA6-D5, eliminate Appendix IX+3 sample at RAA6-E5.
 - 1-6 ft interval: Move RAA6-C17 to RAA6-C15.
 - 6-15 ft interval: Move RAA6-A17 to RAA6-B15.

In addition, as a result of the relocation of the northern boundary of the RAA and the addition of nine PCB sample locations, as well as elimination of a proposed Appendix IX+3 sample, four additional Appendix IX+3 samples (approximately one-third the number of additional PCB samples) will be required to comply with CD requirements. GE shall add the following four Appendix IX+3 samples:

- 0-1 ft interval: RAA6-A11.
 - 1-6 ft interval: RAA6-A11, RAA6-C2, and RAA6-D5.
 - 6-15 ft interval: RAA6-C2.
6. GE states that, should site conditions or obstructions prevent sampling in the proposed locations, the samples in question will be collected as close to the original location as site conditions allow.

Further, regarding Appendix IX+3 sampling, GE states that they will make an effort to maintain the proper ratio of samples collected from the various depth intervals. GE field personnel shall clear any modifications to sample depths or locations with EPA's field representatives, prior to sampling.

7. The legends for Figures 2 through 6 indicate that paved areas have been identified. However, the very faint shading pattern is not distinguishable from non-shaded areas in the figures. As a result, it is not clear what areas have been identified as paved in ESA1-N. GE shall better differentiate between paved and unpaved areas within the PDIWP Addendum.
8. In Appendix A, GE presents existing PCB and non-PCB constituents soil data. In future submittals, GE shall present the limit of detection associated with analytical results in cases where an analyte was reported as not detected (ND), if such information on detection limits is available.

GE shall address the above conditions in an Addendum to the PDIWP, to be submitted within 21 days of the receipt of this letter. EPA reserves its right to perform additional sampling in the areas subject to PDIWP 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
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