



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

A-0600
SDMS 44634

June 20, 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's (GE) 25 April 2003 submittal *Pre-Design Investigation Report for the East Street Area 1-North Removal Action, 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 *Pre-Design Investigation Report for the East Street Area 1-North Removal Action* (Report). The East Street Area 1-North Removal Action Area (RAA) is also referred to as RAA 6 in project documents. This Report 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,

Conditions

1. In Subsection 3.2, GE proposes three surface sampling locations for lead, in response to the elevated lead concentration in the surface soil sample from location RAA6-A16. Proposed sample location RAA6-A15 shall be moved within Parcel K10-14-1 to the north and location RAA6-17 shall be moved east into the grassy areas between the pavement and the fence line. Note that EPA may collect wildcard soil samples from the vicinity of location RAA6-A16.
2. The sample collected at RAA6-A16 also contained antimony at 1,600 parts per million (ppm), which exceeds the Massachusetts Contingency Plan (MCP) Method 1 S-2 Soil Standard for antimony. The elevated concentration of antimony at this location suggests that the average antimony concentration for this parcel at the 0- to 1-ft depth interval may exceed the applicable Performance Standard. As such, GE shall evaluate the above delineation samples (RAA6-A15, A-17 and B-16) for both antimony and lead.
3. EPA's review of the two sets of volatile organic compound (VOC) analytical results for samples collected at location RAA6-C6 indicates that the detection limits for the samples were elevated. In a number of cases, the elevated detection limits are significantly above the Preliminary Remediation Goals (PRGs) for the remaining VOC analytes. Of particular concern is the detection limit for benzene, which was raised to between 3.5 and 3.9 parts per million (ppm) and has an industrial PRG of 1.4 ppm. As benzene may be associated

with ethylbenzene and xylenes in fuel products, it remains unclear whether an exceedance of the benzene PRG has occurred. Ethylbenzene and xylenes were detected in some or all of the samples at this location, at concentrations below their PRGs. Use of one-half the detection limit for non-detected VOC analytes in these samples will result in an exceedance of the benzene PRG, as well as a number of other VOC PRGs. Within two weeks of the date of this letter, GE shall submit an evaluation concerning the need for additional VOC soil sampling related to this data issue (that is, the elevated detection limits) and, if needed, a proposal for supplemental soil investigations.

4. GE shall submit the Conceptual Removal Design/Removal Action Work Plan for this Remedial Action Area to EPA within 120 days from the date of EPA's approval of the PDI Report.

EPA reserves its right to perform additional sampling in RAA 6 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
Jim Nuss, BBL
S. Steenstrup, MDEP
Sue Keydei, MDEP
Bryan Olson, US EPA
Holly Inglis, US EPA
John Kilborn, US EPA
K.C. Mitkevicius, USACE
Dawn Jamros, Weston Solutions, Inc. ✓
Pittsfield MA Office, US EPA
Mayor Sara Hathaway, City of Pittsfield
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