



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

01-0805
SDMS 214579

October 19, 2004

Mr. Andrew T. Silber
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 June 2004 *Pre-Design Investigation Report for the East Street Area 2-North Removal Action*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silber:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Pre-Design Investigation Report for the East Street Area 2-North Removal Action*, (PDI Report) dated June 17, 2004. The PDI 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.

1. In Subsection 2.3 of the Report, GE notes that sample location RAA5-C6 was shifted 20 ft eastward to avoid the cover of a subsurface pit. Weston oversight personnel were present at the time that GE personnel discussed the presence of the subsurface pit with BB&L personnel. GE personnel indicated that the pit may have been a former underground storage tank (UST) that was closed in place. Because the subsurface pit is located in Building 17, which is slated for demolition and transfer to the Pittsfield Economic Development Authority (PEDA), GE shall review its files pertaining to this area and former use of the pit, and conduct field reconnaissance to assess existing conditions. GE has indicated that it intends to place certain building demolition debris from this area in the On-Plant Consolidation Areas (OPCAs). Therefore, in its submittal of the building characterization data to EPA (supporting use of the OPCAs for disposal), GE shall include the results of the file review and field reconnaissance.
2. In Subsection 2.6 of the Report, GE proposes collecting five additional PCB soil samples to fill identified data gaps in the characterization of subsurface utilities subject to emergency repair. EPA has identified four additional sample locations to provide utility characterization coverage at an interval of approximately 100 to 150 linear feet. At each location, samples from the 0 to 1 foot, and 1 to 6 foot depth increments shall be collected and analyzed for PCBs.

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Recommended Sample ID	Sample Location Description	Active Utility in Vicinity
RAA5-H25	South of Building 14-E second extension and immediately north of the railroad spur, between locations PS-W-97 and RAA5-H26	Storm Sewer
RAA5-J19	East of Building 12T, between locations RAA5-J18 and RAA5-K19	Storm Sewer
RAA5-J22	East of Building 100 within the railroad spurs, between locations 100-8 and ES1-2	Storm Sewer
RAA5-K11	South of Building 12, between locations RAA5-J10 and 95-13	Water Main/Storm Sewer

3. In Appendix A of the Report, GE includes soil-boring logs for the PDI soil sampling effort. A review of GE's *Soil Boring Installation and Soil Sampling Procedures*, contained in GE's current *Field Sampling Plan/Quality Assurance Project Plan*, concludes that the logs are incomplete as follows. No changes are necessary to the existing soil-boring logs.
- Less than half of the soil-boring logs contain any reference to soil moisture, and only 13 of the 97 logs are complete with regard to soil moisture. None of the logs identify the water table interface. In future soil investigations for all RAAs, GE shall prepare soil boring logs that contain all the parameters required in *Section IV, Step 1 of Appendix C to GE's Soil Boring Installation and Soil Sampling Procedures*.
 - A number of boring logs record that soil sample recovery was less than 50% for the target sampling interval. These soil-boring logs should document that intervals of poor recovery were re-sampled at least twice in an attempt to improve sample recovery. In the future, GE shall document on the soil-boring logs that three sampling attempts were made at intervals where sample recovery was less than 50%.
4. With regard to the determination of target depth increments to be analyzed for Appendix IX+3 constituents, *GE's Soil Boring Installation and Soil Sampling Procedures* (which is Appendix C to the FSP/QAPP) states on page C-4, "In many cases, the project-specific work plan will specify the target depth increment... However, it may also provide that some modifications to the specified location/depth may be made in the field considering PID readings or visual observations." It further states that "[i]n such cases, the following procedures will be followed: If another sample exhibits a significantly higher PID reading or more visual evidence of contamination (e.g., staining, presence of oil, odor, etc.) than the depth increment specified in the work plan, then such other sample will be selected for Appendix IX+3 analysis, unless similar soil samples from comparable depth increments have been or will be analyzed for Appendix IX+3 constituents at nearby sample locations." Section 4.4 of the April 2003 PDI Work Plan discusses such modifications. Consistent with this approach, EPA has identified two sample locations, RAA5-F33 and RAA5-I17, where Appendix IX+3 sample depth intervals were not moved to depth intervals with elevated headspace readings. In one additional case, at location RAA5-B3, EPA oversight personnel collected a supplemental Appendix IX+3 soil sample from the depth interval with elevated headspace, because GE personnel were not planning to do so. In future soil investigations for all RAAs, GE shall ensure that the protocols specified in Appendix C to the FSP/QAPP are followed.

GE shall initiate supplemental fieldwork and submit the Conceptual RD/RA Work Plan consistent with the schedule provided in Section 3.3 of the Report. Specifically, GE shall conduct the additional sampling proposed in the PDI Report and identified in Comment 3 of this letter. Within 4 months from the date of this letter, GE shall submit to EPA a "data needs assessment" letter evaluating the completeness of the available data set to support the preparation of the Conceptual RD/RA Work Plan within 6 months from the data of this letter. If data needs are identified, the data needs assessment letter should include GE's proposed scope and schedule for additional investigations, and the schedule for submittal of the Conceptual RD/RA Work Plan.

EPA reserves its right to perform additional sampling in the areas subject to PDI Report 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) 918-1247.

Sincerely,



James M. DiLorenzo
GE Facility Project Manager

cc: John Novotny,	GE
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