



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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2.6
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September 13, 2005

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

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's April 2005 *Conceptual Removal Design/Removal Action Work Plan for East Street Area 2-North*, 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 *Conceptual Removal Design/Removal Action Work Plan for East Street Area 2-North*, (Work Plan) dated April 19, 2005. The 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 Work Plan, subject to the following conditions.

1. Section 3.3 states that "GE has utilized the proposed MCP Method 1 (Wave 2) soil standards (as opposed to the current MCP standards) for the relevant portions of the non-PCB evaluations..." EPA and MDEP concur with this approach, however GE may be required to re-evaluate the non-PCB constituents if the proposed Wave 2 soil standards are not finalized.
2. Section 3.3.3 explains that the Appendix IX constituent, benzidine, was screened out of the evaluation due to a low frequency of detection (1 out of 121 samples.) According to Table 2 of the June 2004 PDI Report, benzidine was detected in sample #RAA5-F2 at a concentration of 0.31 ppm at a depth interval of 1 to 6 feet bgs. Although benzidine results are reported as "non-detect (ND)" in all other samples, detection limits were consistently above 0.70 ppm, which is well above the detected concentration, and significantly above the screening PRG concentration of 0.013 ppm. There is no current or proposed MDEP soil standard for benzidine. GE shall make a proposal to further evaluate the presence of benzidine, and include this proposal in the supplement to the Work Plan (described above).
3. Section 4.2.3, second paragraph, states that GE proposes to pave "small, non-continuous, and currently unpaved areas" near samples PS-W-94, PS-W-95, PS-W-96, and PS-W-97, in lieu of soil removal. As stated in Section 2.2.2 of the SOW, and referenced on page 3-1 of the Work

Plan, the performance standard for unpaved portions of the GE plant area where the spatial average PCB concentration in the top one foot of soil exceeds 25 ppm requires GE to either “remove and replace soils or install a soil cover (in accordance with the specifications for soil covers described in Attachment G of the SOW.)” Further, PCB concentrations are not to exceed (NTE) 125 ppm in the top one foot of soil in unpaved areas. The area proposed for paving contains PCB concentrations that range from 160 to 1,500 ppm in the top two feet bgs. Therefore, since the related samples are located immediately adjacent to unpaved areas, GE shall remove and replace soil within the top one foot of the unpaved portions of the related polygons to achieve the NTE performance standard, and evaluate whether additional actions are necessary to achieve the remaining performance standards.

4. Section 4.3 discusses the utility corridor evaluations. GE concludes that no utility-specific response actions are warranted. EPA agrees with this conclusion in areas where GE has stated that utilities are no longer active (i.e., near samples ES1-6, PS-W-47 and PS-W-53.) However, there is an active electrical conduit in the immediate vicinity of samples PS-W-90, PS-W-95 and PS-W-96, and an active water main and electrical conduit in the immediate vicinity of RAA5-J10. While the second bullet of this Section of the Work Plan points out that repairs to underground electrical conduits “typically” involve running new lines through existing conduit, rather than excavation, it is not clear whether there remains a possibility of invasive excavations in connection with repairs to such conduits, including in emergency situations. GE shall provide additional information on this issue in the supplement to the Work Plan (described below). It should also be noted that this bullet erroneously states that “the unpaved portion of the polygons associated with these locations is being removed, as shown on Figure 4-1.” As indicated in Condition #3 above (and shown on existing Figure 4-1,) GE proposed pavement for these areas, although that proposal will need to be changed in response to Condition #3. Additionally, there is an active water main in the vicinity of sample RAA5-J10.

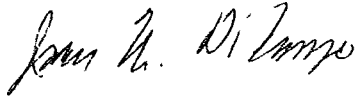
Consistent with the performance standards for utilities, as summarized on page 3-2 of the Work Plan, GE shall take the following steps: First, GE shall further evaluate whether the active utility lines in these areas are potentially subject to emergency repair activities that could involve exposure to subsurface soil. Second, for those that are, GE shall calculate the spatial average PCB concentration in the 1-to 6-foot depth increment in the utility corridor. Third, for any such corridor where the spatial average PCB concentration exceeds 200 ppm, GE shall evaluate whether additional response actions are necessary in that corridor; that evaluation shall include a discussion of how emergency excavations would be handled.

Please submit the additional information required in Conditions no. 2, 3 and 4 above, as a supplemental submittal to the Work Plan, within 4 weeks from the date of this letter.

EPA reserves its right to perform additional sampling or evaluations in the areas subject to this Work Plan, 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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