



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted Via Electronic Mail and Overnight Delivery*

July 6, 2006

Ms. Sharon Hayes  
United States Environmental Protection Agency  
EPA New England (MC HBO)  
One Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
East Street Area 2-North (GECD140)  
Buildings 7, 17, 17C, and 19 Demolition and Site Restoration Program  
Follow-up to Notification of Ambient Air PCB Results Exceeding Notification Level**

Dear Ms. Hayes:

This letter is a follow-up to the verbal notification that Michael Hassett of Blasland, Bouck & Lee, Inc. provided to you, on behalf of the General Electric Company (GE), on June 28, 2006, regarding an exceedance of the PCB air monitoring notification level. That exceedance was shown by the data collected on June 18-19, 2006, at a location near Buildings 7, 17, and 19 at the GE Plant during the PCB baseline air monitoring event conducted in support of the upcoming demolition of these buildings.

As Mr. Hassett explained, the pre-demolition baseline PCB air monitoring event associated with the Buildings 7, 17, 17C, and 19 Demolition and Site Restoration Program was conducted on the weekend of June 17-18 and June 18-19, 2006, during which period no active operations were being conducted by GE. Ambient air samples were collected over those two 24-hour periods (i.e., June 17-18 and June 18-19) at the three air monitoring station locations established for this program – MC3A, M7, and M2A (at which there is a co-located monitor, M2A-CO) – as well as at a background station (BK3) located east of Building 9B. These air monitoring station locations are shown on the attached Figure 1. These samples were analyzed for PCBs. The resulting PCB data are presented in the attached Table 1. The data from June 17-18 show no exceedances of the applicable PCB air monitoring notification level ( $0.05 \mu\text{g}/\text{m}^3$ ) or action level ( $0.1 \mu\text{g}/\text{m}^3$ ). However, the data from June 18-19 show exceedances of the PCB notification level at monitoring stations M2A and M2A-CO ( $0.0509$  and  $0.0592 \mu\text{g}/\text{m}^3$ , respectively), although not at the other stations. GE received notification of these results from its air monitoring consultants on June 28, 2006, and notification was provided to EPA on that same day.

As required by GE's currently applicable *Ambient Air Monitoring Plan* (which is part of its July 2003 *Project Operations Plan*), GE has conducted an evaluation concerning the cause of this exceedance of the notification level and the need for corrective action to prevent exceedances of the action level. In doing so, GE has considered the following factors:

- The PCB results reported for monitoring stations M2A and M2A-CO on June 18-19, 2006, are higher than any other results previously recorded at any monitoring station within the GE Plant Area. No previous exceedances of the PCB notification level have been recorded.
- There were no active site operations being performed on this day because it was a weekend.
- It was a very hot and humid day.
- Review of the raw analytical data and associated quality assurance/quality control (QA/QC) information associated with these samples has not, to date, revealed any evidence that the data may be invalid.
- Location M2A is located directly within an area that was, at the time of this event, the work area of the Buildings 1, 1A, 2, 3, 3B, and 100 Annex Demolition and Site Restoration Program. In fact, it is actually located on the slab of former Building 1. GE had originally proposed to locate this monitoring station (then called M2) to the southwest of its current location, adjacent to the railroad tracks at the perimeter of the work area, so as to monitor for potential off-site air impacts. That originally proposed location is also shown on Figure 1. It was moved to its current location in response to comments from EPA. While there was no work activity in this area on the day that the notification level exceedance was recorded, we note that during the timeframe of this baseline monitoring event (i.e., mid-June 2006), activities associated with the Buildings 1, 1A, 2, 3, 3B, and 100 Annex Demolition and Site Restoration Program were still ongoing. These activities included backfilling of manholes and vaults located within the former building slabs, large equipment dismantling, the continued presence in the area of building demolition debris, and removal of piping from the subsurface crossover tunnel that runs from the southwest corner of the former Building 1 slab to the railroad tracks.
- The remaining activities associated with the Buildings 1, 1A, 2, 3, 3B, and 100 Annex Demolition and Site Restoration Program activities have now been completed, and the contractor for that program has demobilized.

Although some of the above factors (e.g., the meteorological conditions, coupled with the location of monitoring station M2A directly within a then-ongoing demolition work area) may have contributed to the anomalously high PCB concentrations recorded at location M2A on June 18-19, GE has not been able to definitively identify the cause of the exceedance. In any case, given the fact that this was a baseline sampling event for the Buildings 7, 17, 17C, and 19 Demolition and Site Restoration Program and that the work activities associated with the Buildings 1, 1A, 2, 3, 3B, and 100 Annex Demolition and Site Restoration Program in this area have now been completed, GE has not identified the need for any specific corrective measures at this time.

However, GE plans to add to the ambient air monitoring program for the Buildings 7, 17, 17C, and 19 Demolition and Site Restoration Program an additional monitor at location M2 (see Figure 1). That additional monitoring location is at the perimeter of the work area and thus should provide data that better represent the potential for off-site ambient air impacts to the south of the work area. Further, GE plans to conduct another pre-demolition baseline monitoring event for this program, which will include the new monitor at location M2 as well as all the existing monitors. GE will advise EPA of the timing of that additional baseline monitoring event.

In the meantime, please call me if you have any questions about this matter.

Sincerely,

A handwritten signature in purple ink that reads "Michael T. Carroll". The signature is written in a cursive style with a horizontal line through the middle of the name.

Michael T. Carroll  
Manager, Pittsfield Remediation Programs

Attachments

cc: Dean Tagliaferro, EPA  
Rose Howell, EPA (w/o attachments)  
Holly Inglis, EPA  
Tim Conway, EPA  
Linda Palmieri, Weston  
Susan Steenstrup, MDEP  
Anna Symington, MDEP  
Jane Rothchild, MDEP  
Tom Hickey, Director, PEDDA  
Andrew Silber, GE  
Richard Gates, GE  
Rod McLaren, GE  
James Nuss, BBL  
Michael Hassett, BBL  
Maura Hawkins, BEC  
James Bieke, Goodwin Procter  
Public Information Repositories  
GE Internal Repository

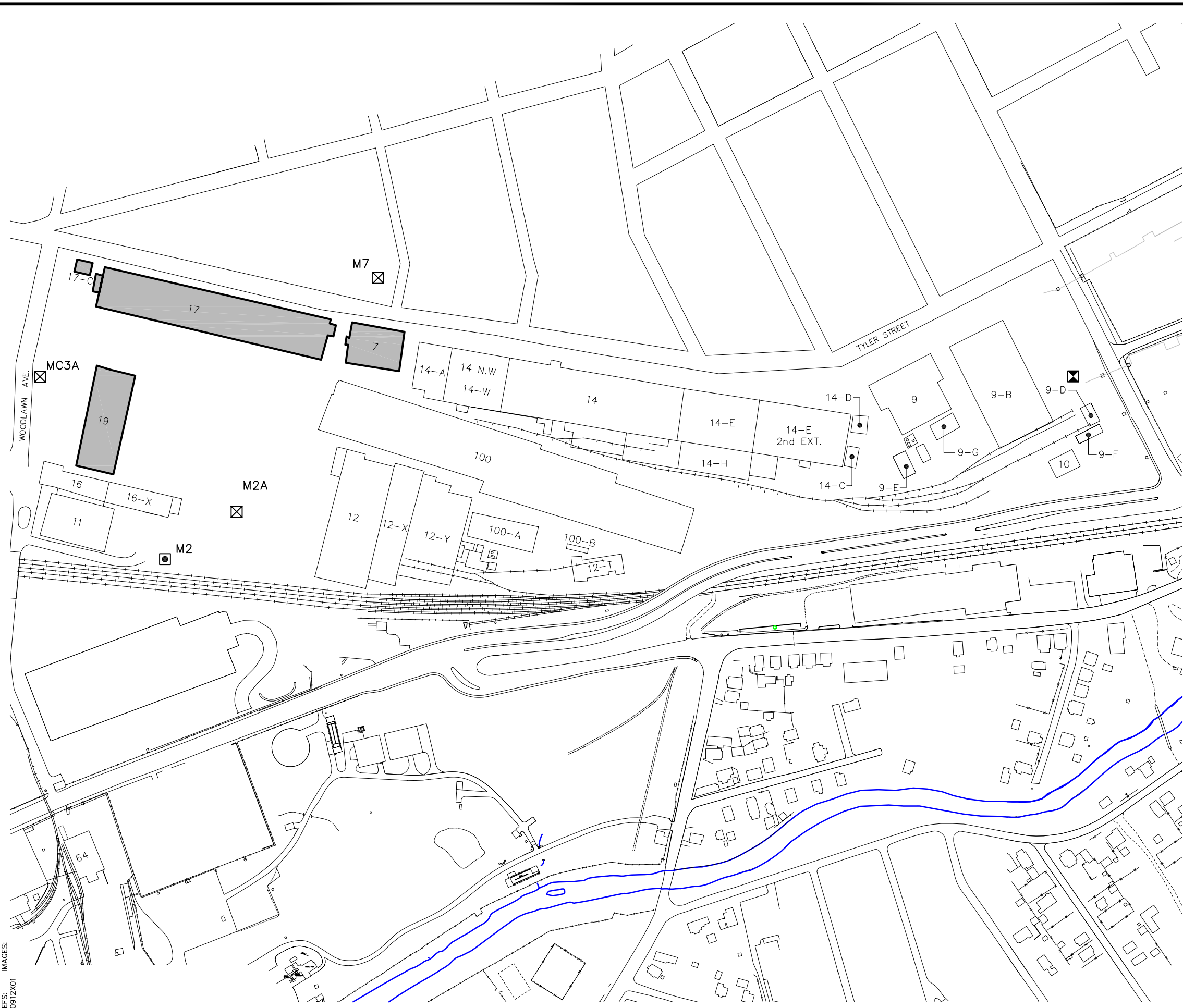
**TABLE 1  
 AMBIENT AIR PCB DATA RECEIVED DURING JUNE 2006**

**PRE-DEMOLITION BASELINE PCB AMBIENT AIR CONCENTRATIONS  
 BUILDINGS 7, 17, 17C & 19  
 GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Sampling Event Period	Date Analytical Results Received by BEC, Inc.	Field Blank (µg/PUF)	MC3A (µg/m3)	M7 (µg/m3)	M2A (µg/m3)	M2A-CO (colocated) (µg/m3)	BK3 - Background - East of Building 9B (µg/m3)
06/17 - 06/18/06	06/26/06	ND (<0.10)	0.0106	0.0036	0.0155	0.0158	0.0015
06/18 - 06/19/06	06/27/06	ND (<0.10)	0.0137	0.0082	0.0509	0.0592	0.0019
Notification Level		0.05	0.05	0.05	0.05	0.05	0.05

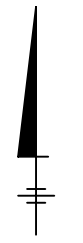
ND - Non Detect

SYR-85-BOP DUP LAF LAYER: ON=\*, OFF=REF\*, LANDFILL\*, ISP-SB-7-99  
 G:\GE\_ACTIVE\C\20912001\BLDG\_7-19\_20912G02.DWG SAVED: 7/5/2006 1:33 PM LAYOUT: Layout1 PAGESETUP: ----- PENTABLE: PLTFULL.CTB PRINTED: 7/5/2006 1:47 PM BY: LAF  
 PROJECTNAME: 20912X01  
 XREFS: IMAGES: 20912X01



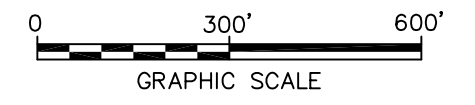
**LEGEND:**

- ☒ M2A APPROXIMATE AMBIENT AIR MONITORING STATION LOCATION AND ID NUMBER
- ☒ APPROXIMATE BACKGROUND AMBIENT AIR MONITORING STATION LOCATION
- M2 APPROXIMATE SUPPLEMENTAL AMBIENT AIR MONITORING STATION LOCATION AND ID NUMBER



**NOTES:**

1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1990; DATA PROVIDED BY GENERAL ELECTRIC COMPANY; AND BLASLAND, BOUCK & LEE, INC. (BBL) CONSTRUCTION PLANS; AND FROM SURVEY PROVIDED BY HILL ENGINEERS, ARCHITECTS, AND PLANNERS, DATED 6/5/01.
2. BUILDING NUMBER DESIGNATIONS ARE BASED ON A GE DRAWING TITLED, GROUND PLAN, SHEET 1, AND DATED JANUARY 1, 1994.
3. NOT ALL PHYSICAL FEATURES ARE SHOWN.
4. THE LOCATIONS OF AIR MONITORING STATIONS SHOWN ON THIS DRAWING ARE APPROXIMATE ONLY. ACTUAL LOCATIONS TO BE DETERMINED BASED ON SITE CONDITIONS AT THE TIME OF DEMOLITION.
5. THE LOCATION OF AMBIENT AIR MONITORING STATION M7 HAS BEEN RELOCATED TO THE GE-OWNED LOT LOCATED ACROSS TYLER STREET, AS REQUESTED BY EPA.
6. AMBIENT AIR MONITORING STATIONS M2A AND MC3A HAVE BEEN RELOCATED BASED ON COMMENTS FROM EPA; HOWEVER, ON-SITE CONSTRUCTION ACTIVITIES (e.g., TRUCK TRAFFIC, DEBRIS STAGING) RESTRICT THE AVAILABLE SPACE WITHIN WHICH THESE STATIONS CAN BE RELOCATED.



GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**BUILDINGS 7, 17, 17C, AND 19**  
**DEMOLITION AND SITE RESTORATION PROGRAM**  
**BUILDINGS 7, 17, 17C, AND 19**  
**LOCATIONS OF AMBIENT AIR**  
**MONITORING STATIONS**

  
 an ARCADIS company

FIGURE  
**1**