



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Delivery

August 15, 2005

Mr. William P. Lovely, Jr.
United States Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
East Street Area 2-South (GECD150)
Addendum to Interim Letter Report – Proposed Additional RD/RA-Related Investigations**

Dear Mr. Lovely:

On October 22, 2004, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a document titled *Interim Letter Report – Proposed Additional RD/RA-Related Investigations* (Interim Letter Report). EPA subsequently provided conditional approval of that document in a letter to GE dated August 2, 2005. As directed therein, EPA's comments were to be addressed in an Addendum to the Interim Letter Report (Addendum). This letter serves as that Addendum and provides GE's responses to EPA's comments.

EPA Comment No. 1 – *GE shall revise Figure 2 of the Interim Letter Report to include sample locations RAA4-H12 and RAA4-J7, which appear to have been left off that figure.*

GE Response – GE believes that EPA intended to refer to sample location RAA4-I7 rather than RAA4-J7 in its conditional approval letter. GE has added sample locations RAA4H-12 and RAA4-I7 to a revised Figure 2, which is attached.

EPA Comment No. 2 – *GE shall install a new boring in the general vicinity of X-19 and consistent with previous pre-design investigation activities, analyze the boring for AIX+3 constituents (excluding pesticides and herbicides) at the following depth intervals: 0- to 1-foot, 1- to 6-foot, and 6- to 15-foot depth intervals.*

GE Response – GE has added a proposed soil boring, RAA4-A36, in the general vicinity of X-19. Samples will be collected from the 0- to 1-foot, 1- to 6-foot, and 6- to 15-foot depth increments and submitted for Appendix IX+3 constituent analyses (excluding pesticides and herbicides). The proposed soil boring has been included on the revised Table 1 and Figure 2 of the Interim Letter Report, which are attached.

EPA Comment No. 3 – *EPA agrees with GE's proposed use of surrogate constituents to determine applicable PRGs with the following exceptions. For 7,12-dimethylbenz(a)anthracene, attachment F to the SOW specifies the use of benzo(a)pyrene as a surrogate for 7,12-dimethylbenz(a)anthracene, not benzo(a)anthracene. In further evaluations, GE shall use benzo(a)pyrene as the surrogate for 7,12-dimethylbenz(a)anthracene. In addition EPA does not agree with the surrogate for the following three of the listed compounds:*

- a. 2-Acetoaminofluorene
- b. 3-Methylcholanthrene
- c. P-Dimethylaminoazobenzene

For these three compounds, GE shall provide additional information to support the proposed use of the surrogates identified above, propose alternate surrogates, or propose an alternative approach for addressing these constituents. In addition, in future references to 4,6 Dinitro-2-methylphenol, GE shall note that this compound is also known as 4,6 Dinitro-o-cresol.

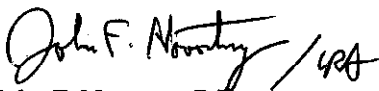
GE Response – The surrogates proposed in the Interim Letter Report for the three above-listed constituents were selected by GE's risk assessment consultant (AMEC Earth & Environmental, Inc.) because they are the constituents that are as structurally similar as possible to the constituents in question and for which EPA Region IX PRGs exist. As requested by EPA, GE shall either: 1) provide additional information to support the proposed use of the surrogates identified above, 2) propose alternate surrogates, or 3) propose an alternative approach for addressing these constituents in the forthcoming Conceptual RD/RA Work Plan for East Street Area 2-South. GE will use benzo(a)pyrene as the surrogate for 7,12-dimethylbenz(a)anthracene. In future references to 4,6 Dinitro-2-methylphenol, GE will note that this compound is also known as 4,6 Dinitro-o-cresol.

EPA Comment No. 4 – *Figure 2: GE shall add a note to the legend to describe the green dashed line (i.e., proposed expansion area).*

GE Response – GE has made the requested revision to Figure 2 of the Interim Letter Report.

Please contact me with any questions or comments regarding the information contained herein.

Sincerely,



John F. Novotny, P.E.
Manager – Facilities & Brownfields Programs

Enclosures

V:\GE_Pittsfield_CD_ESA_2_South\Reports and Presentations\48952196Ltr.DOC

cc: Dean Tagliaferro, EPA
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Public Information Repositories
Pittsfield Department of Health
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* cover letter only

Table

**TABLE 1
SUMMARY OF PROPOSED SAMPLING LOCATIONS
EAST STREET AREA 2 - SOUTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Parcel ID	Nearest Grid Coordinate	Sample ID	Sample Depth (ft)	Analysis				
				PCBs	VOCs	SVOCs	Inorganics	PCDD/PCDF
Area 4A	F9	RAA4-F9	1-6	X	--	--	--	--
	F11	RAA4-F11N	1-6	X	--	--	--	--
	G7	RAA4-G7N	1-6	X	--	--	--	--
	H4	RAA4-H4N	1-6	X	--	--	--	--
	L9	RAA4-L9	0-1	X	--	--	--	--
	L10	RAA4-L10	0-1	X	--	--	--	--
Area 4B	A36	RAA4-A36	0-1	--	X	X	X	X
			1-6	--	X	X	X	X
			6-15	--	X	X	X	X
	C25	RAA4-C25N	1-6	X	--	--	--	--
	C27	RAA4-C27N	1-6	X	--	--	--	--
	D21	RAA4-D21N	1-6	X	--	--	--	--
	D26	RAA4-D26	1-6	X	--	--	--	--
	D37	RAA4-16NW	1-6	X	--	--	--	--
	E15	RAA4-E15N	1-6	X	--	--	--	--
	E17	RAA4-E17N	1-6	X	--	--	--	--
	G23	RAA4-G23	3-6	X	--	--	--	--
	G27	RAA4-G27E	1-6	X	--	--	--	--
	HH30	RAA4-HH30	0-1	X	--	--	--	--
	I28	RAA4-I28	0-1	X	--	--	--	--
	L19	RAA4-L19	0-1	X	--	--	--	--
	L23	RAA4-L23	0-1	X	--	--	--	--
	--	206S-N	0-1	--	--	X	--	--
	--	206S-E	0-1	--	--	X	--	--
--	206S-S	0-1	--	--	X	--	--	
--	206S-W	0-1	--	--	X	--	--	
Area 4D	--	211S-N	0-1	--	--	X	--	--
	--	211S-E	0-1	--	--	X	--	--
	--	211S-S	0-1	--	--	X	--	--
	--	211S-W	0-1	--	--	X	--	--
Area 4E	J27	RAA4-J27	0-1	X	X	X	X	X
	K26	RAA4-K26	0-1	X	--	--	--	--
	L18	RAA4-L18	0-1	X	X	X	X	X
	L24	RAA4-L24	0-1	X	--	--	--	--
	L25	RAA4-L25	0-1	X	--	--	--	--
	L26	RAA4-L26	0-1	X	X	X	X	X
	M18	RAA4-M18	0-1	X	--	--	--	--
	M20	RAA4-M20	0-1	X	--	--	--	--
	M22	RAA4-M22	0-1	X	--	--	--	--
	M25	RAA4-M25	0-1	X	X	X	X	X
	N4	RAA4-N4	0-1	X	X	X	X	X
	N6	RAA4-N6	0-1	X	X	X	X	X
	N17	RAA4-N17	0-1	X	--	--	--	--
			1-3	X	--	--	--	--
			3-6	X	--	--	--	--
	N18	RAA4-N18	0-1	X	--	--	--	--
	N19	RAA4-N19	0-1	X	X	X	X	X
	N20	RAA4-N20	0-1	X	--	--	--	--
	N21	RAA4-N21	0-1	X	--	--	--	--
	N22	RAA4-N22	0-1	X	--	--	--	--
	N23	RAA4-N23	0-1	X	--	--	--	--
	N24	RAA4-N24	0-1	X	--	--	--	--
	N25	RAA4-N25	0-1	X	--	--	--	--
	N27	RAA4-N27	0-1	X	--	--	--	--
	N28	RAA4-N28	0-1	X	X	X	X	X
O18	RAA4-O18	0-1	X	X	X	X	X	
O22	RAA4-O22	0-1	X	X	X	X	X	
O24	RAA4-O24	0-1	X	--	--	--	--	
P21	RAA4-P21	0-1	X	X	X	X	X	
P22	RAA4-P22	0-1	X	--	--	--	--	
P24	RAA4-P24	0-1	X	X	X	X	X	
P25	RAA4-P25	0-1	X	--	--	--	--	

**TABLE 1
SUMMARY OF PROPOSED SAMPLING LOCATIONS
EAST STREET AREA 2 - SOUTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Parcel ID	Nearest Grid Coordinate	Sample ID	Sample Depth (ft)	Analysis				
				PCBs	VOCs	SVOCs	Inorganics	PCDD/PCDF
Area 4E	--	RAA4-I30N	0-1	--	--	--	--	X
		RAA4-I30E	0-1	--	--	--	--	X
		RAA4-I30S	0-1	--	--	--	--	X
		RAA4-I30W	0-1	--	--	--	--	X
	--	RAA4-M23N	0-1	--	--	--	--	X
		RAA4-M23E	0-1	--	--	--	--	X
		RAA4-M23S	0-1	--	--	--	--	X
		RAA4-M23W	0-1	--	--	--	--	X
	--	RAA4-O19N	1-3	--	--	X	--	--
		RAA4-O19E	1-3	--	--	X	--	--
		RAA4-O19S	1-3	--	--	X	--	--
		RAA4-O19W	1-3	--	--	X	--	--
	--	BH000750	1-3	--	--	X	--	--
			3-6	--	--	X	--	--
		BH000750-N	1-3	--	--	Y	--	--
			3-6	--	--	Y	--	--
		BH000750-E	1-3	--	--	Y	--	--
			3-6	--	--	Y	--	--
		BH000750-S	1-3	--	--	Y	--	--
			3-6	--	--	Y	--	--
		BH000750-W	1-3	--	--	Y	--	--
			3-6	--	--	Y	--	--

Notes:

1. X = Identifies location and depth for which a soil sample will be collected and submitted for analysis.
2. Y = Identifies location and depth for which a soil sample will be collected and held for possible future analysis.
3. -- = Sample not proposed for specified depth interval.

Figure



- NOTES:
1. THE BASE MAP WAS PREPARED FROM A SURVEY PREPARED BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, DRAWING NO. GE-1081-1, DATED 3/24/04.
 2. UTILITIES ARE SHOWN IN AN APPROXIMATED WAY ONLY AND ALL UTILITIES MAY NOT BE SHOWN. PRIOR TO ANY CONSTRUCTION, THE CONTRACTOR SHALL CONTACT "DIG-SAFE" AND HAVE ALL UNDERGROUND UTILITIES MARKED ON THE GROUND.
 3. AVERAGING AREAS 4A THROUGH 4E ARE IDENTIFIED ON FIGURE E-1 OF ATTACHMENT E TO THE STATEMENT OF WORK FOR REMOVAL ACTIONS OUTSIDE THE RIVER (SOW) AS FOLLOWS:
 - 4A - 60S COMPLEX
 - 4B - FORMER GAS PLANT/SCRAP YARD AREA
 - 4C - CITY RECREATIONAL AREA
 - 4D - 200 FOOT INDUSTRIAL AVERAGING STRIP
 - 4E - 200 FOOT RIPARIAN REMOVAL ZONE



LEGEND	
	APPROXIMATE REMOVAL ACTION AREA BOUNDARY
	APPROXIMATE LIMITS OF RD/RA AVERAGING AREAS
	APPROXIMATE LIMITS OF PROPOSED EXPANSION AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT ACTIONS
	PROPERTY LINE
	EASEMENT LINE
	EDGE OF WATER
	STONE WALL
	CHAIN LINK FENCE
	RETAINING WALL
	RAILROAD TRACKS
	TREELINE
	SHRUB
	UTILITY POLE
	HYDRANT
	STEEL VAULT
	ELECTRIC TRANSFORMER
	LIGHT
	CATCH BASIN
	BOLLARD
	BUILDING
	BUILDINGS SUBJECT TO FUTURE DEMOLITION
	PAVED AREA (ASPHALT/CONCRETE)
	UNPAVED AREA (GRASS/DIRT/GRAVEL)
	AREA ADDRESSED AS PART OF BUILDING 68 REMOVAL ACTION OR 1/2-MILE REACH REMOVAL ACTION
	PORTION OF 200 FOOT RIPARIAN REMOVAL ZONE WHERE VEGETATIVE ENGINEERED BARRIER WAS ASSUMED TO BE NEEDED IN THE PRE-DESIGN INVESTIGATION WORK PLAN
	GAS SERVICE
	SANITARY SEWER
	WATER SERVICE
	DRAIN LINE
	▲ RAA4-6 SURFACE SOIL SAMPLE LOCATION (0- TO 1- FOOT SAMPLE DEPTH)
	● E2SC-06 SOIL BORING LOCATION (1- FOOT OR GREATER SAMPLE DEPTH)
	■ SLO403 EXISTING RIVER BANK SOIL SAMPLE
	▲ RAA4-L9 PROPOSED SURFACE SOIL SAMPLE LOCATION (0- TO 1- FOOT SAMPLE DEPTH)
	○ RAA4-K9 PROPOSED SOIL BORING LOCATION (1- FOOT OR GREATER SAMPLE DEPTH)
	50' WIDE CORRIDOR USED TO DETERMINE WHICH SAMPLES ARE INCLUDED IN UTILITY CORRIDOR EVALUATIONS

X: 10111X05, X77.DWG
 L: ON=*, OFF=REF
 P: PAGESET/SYR-DL
 8/15/05 SYR-85-DMW DMW GMS
 N/10111003/POLYGONS/10111B20.DWG

GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
**INTERIM LETTER REPORT FOR
 EAST STREET AREA 2-SOUTH**

**EXISTING AND PROPOSED PCB
 SOIL SAMPLING LOCATIONS**

BBL
 BLAISLAND, BOUCK & LEE, INC.
 engineers, scientists, economists

FIGURE
2