



01-0482

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

May 2, 2002

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 April 5, 2002** *submittal titled Addendum to Pre-Design Investigation Work Plan for the East Street Area 2-South Removal Action, General Electric (GE) Housatonic River Project Site, Pittsfield, Massachusetts.*

Dear Mr. Silber:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Addendum to Pre-Design Investigation Work Plan for the East Street Area 2-South Removal Action*.

This *Addendum to Pre-Design Investigation Work Plan for the East Street Area 2-South Removal Action* (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 submittal subject to the following conditions:

Conditions

1. GE has identified several existing soil samples for use in characterizing two adjacent depth intervals, for example GE proposes to characterize both the 0- to 1-foot and 1- to 6-foot depth intervals using a single sample collected from the 0- to 2-foot depth interval (e.g., samples X-13 and Y-22). GE shall use individual samples to characterize only a single depth interval.
2. EPA has identified various areas of East Street Area 2-South where additional samples are needed to better characterize both the PCB and Appendix IX+3 constituent concentrations in the Removal Action Area (RAA). Table 1 presents an initial list of the split and "wildcard" samples EPA proposes to collect from the GE Pre-Design Investigation soil borings at the East Street Area 2-South RAA. During the Pre-Design Investigation soil-sampling program, GE shall coordinate the collection of these samples with EPA's Oversight Contractor. Field activities in East Street area 2-South are scheduled to initiate on May 6, 2002.
3. In consideration of the recent negotiations concerning the characterization of utility corridors subject to potential emergency repair at Newell Street Areas I and II, GE shall review the distribution of existing and proposed PCB and Appendix IX+3 soil samples at East Street Area 2-South to determine if the subject utility corridors will be adequately characterized.

5. Minor specific comments.

- a) Sample 68S-1 was not shown on Figure 6.
- b) Neither Table 2, nor Table 5, indicates that data exist for inorganic constituents for Sample 95-25 (also Table 5); however, Figure 6 indicates that inorganic data is available for this sample.
- c) Samples identified for supplemental Appendix IX characterization are not included in Table 5 and could not be located on Figures 4, 5 or 6 (e.g., BF-1, BF-2, BF-3 and BF-6, RS-1 through RS-7, SS-1 and WM-1). All data to be used in characterizing the area should be included in applicable figures and tables.
- d) Sample E2SC-05 (38- to 40-foot depth interval) is identified for "Appendix IX Characterization" use, and should be identified as "Rejected" because the sample's depth interval exceeds the 0 to 15-foot depth characterization limit.

EPA reserves its right to perform additional sampling in the area subject to the Pre-Design Investigation Work Plan for the East Street Area 2-South Removal Action 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 Nalipinski
GE Facility Project Manager

Attachments

cc: John Novotny, GE
James Bieke, Shea & Gardner
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Mayor Sara Hathaway, City of Pittsfield
Tom Hickey, PEDAs
Teresa Bowers, Gradient
Public Information Repositories (4)
Site File

TABLE 1
East Street Area 2-South RAA
EPA's Proposed Split and Wildcard Samples

No.	Proposed Location ID	0 - 1 ft	1 - 6 ft	6 - 15 ft
1	RAA4-D21	---	---	VOC/SVOC/Inorg.
2	RAA4-E29	---	PCB	---
3	RAA4-E38	---	---	VOC/SVOC/Inorg.
4	RAA4-E39	---	VOC/SVOC/Inorg.	---
5	RAA4-F23	---	PCB	---
6	RAA4-F36	PCB	PCB/VOC/SVOC/Inorg.	VOC/SVOC/Inorg.
7	RAA4-F37	---	Dioxin	---
8	RAA4-G14	---	VOC/SVOC/Inorg.	---
9	RAA4-G15	VOC/SVOC/Inorg	---	Dioxin
10	RAA4-G27	---	PCB/VOC/SVOC/Inorg.	PCB
11	RAA4-H17	---	PCB	VOC/SVOC/Inorg./Dioxin
12	RAA4-H24	---	PCB/VOC/SVOC/Inorg.	VOC/SVOC/Inorg.
13	RAA4-H29	---	---	PCB/VOC/SVOC/Inorg.
14	RAA4-H3	---	---	VOC/SVOC
15	RAA4-I25	---	PCB/VOC/SVOC/Inorg.	---
16	RAA4-K11	---	---	VOC/SVOC/Inorg.
17	RAA4-K15	VOC/SVOC/Inorg.	---	PCB/VOC/SVOC/Inorg.
18	RAA4-K17	---	Dioxin	---
19	RAA4-K25	---	PCB	PCB/VOC/SVOC/Inorg.
20	RAA4-K31	---	PCB/VOC/SVOC/Inorg.	VOC/SVOC/Inorg.
21	RAA4-K33	---	VOC/SVOC/Inorg.	---
22	RAA4-L8	---	---	VOC/SVOC/Inorg.
23	RAA4-M17	PCB	Dioxin	---
24	RAA4-M23	---	---	VOC/SVOC/Inorg.
25	RAA4-M27	---	VOC/SVOC/Inorg./Dioxin	---
26	RAA4-M3	---	---	Inorganics
27	RAA4-M7	---	VOC/SVOC/Inorg.	---
28	RAA4-O19	---	PCB	---
29	RAA4-O25	PCB	PCB(3-6)	---
30	RAA4-O3	PCB/VOC/SVOC/Inorg.	---	---
31	RAA4-O9	---	---	PCB
32	RAA4-Q6	---	---	VOC/SVOC/Inorg.

Notes: **Analytes in Bold Type Indicate Split Sample with GE**
 Analytes in Normal Type Indicate Wildcard Samples

Comments

The following comments are included for informational purposes or to identify issues, which GE will need to address in future East Street Area 2-South work plans and reports.

1. Table 1-Existing Soil PCB Data and Proposed Usage.

Several samples, including E2SC-03 and EB-27 (being used to characterize grid locations G-38 and P-16, respectively) are included in Table 3, and should be included in Table 1.

2. Table 2, Existing Soil Appendix IX+3 Data and Proposed Usage.

Several samples have proposed data uses of "None (RRZ Eng. Barrier)," and these samples are not shown on Figures 4, 5 and 6 (e.g., samples ES2-2, ES2-3 and ES2-4). However, other samples located within the area of the 200-Foot Riparian Removal Zone (RRZ) engineered barrier area are identified for Appendix IX characterization use and are shown on Figures 4, 5 and 6. In accordance with the March 5, 2002 conditional approval letter from EPA, GE should provide clear rationale for why some data is retained and other data is not retained for Appendix IX characterization use (e.g., samples associated with polygons that extend beyond the limits of the engineered barrier).

3. Table 4 - Proposed Paved Area Characterization for PCBs.

Sample locations I-11S and Y-18 should be included in this table.

4. Table 5 - Proposed Characterization of Appendix IX+3 Constituents.

- a) Samples E-39 and G-36 are not included in Table 5. However, since these locations are shown on Figure 4, they should be included in Table 5.
- b) GE has listed the associated averaging area for each sample in Table 5. Based on Figure 1, which presents the averaging areas as identified in the Statement of Work (SOW) to the CD, EPA believes that the averaging areas for several sample locations are incorrectly identified.
 - i) 0- to 1-foot depth interval -
 - ii) Samples Y-22, G-17 and H-17 are incorrectly identified as being within the 60s Complex area; they actually appear to be within area 4B, the Former Scrap Yard.
 - iii) Sample G-38 is identified as being part of 4B, the Former Scrap Yard averaging area, when it should be identified as part of area 4D, the 200-foot Industrial Averaging Strip.
 - iv) 1- to 6-foot depth interval - Samples Y-12, Y-17 and Y-22 should be identified as being within area 4B, the Former Scrap Yard averaging area, not within the 60s Complex.
 - v) 6- to 15-foot depth interval - Samples 95-19 and E2SC-13 are identified as being part of averaging areas 4A and 4B, respectively, however they appear to lie in areas 4B and 4D, respectively.