GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Courier

May 1, 2008

Mr. Dean Tagliaferro
United States Environmental Protection Agency
c/o Weston Solutions
10 Lyman Street
Pittsfield, MA 01201

Re: GE-Pittsfield/Housatonic River Site
East Street Area 2-South (GECD 150)
Demolition and Disposition Activities – Buildings 63, 63X, and 68

Dear Mr. Tagliaferro:

The General Electric Company (GE) has prepared this letter to describe its plans for the demolition of Buildings 63, 63X, and 68 at GE's Pittsfield, Massachusetts facility (Figure 1), and to seek the U.S. Environmental Protection Agency's (EPA's) approval for the consolidation of certain of the demolition debris at GE's Hill 78 On-Plant Consolidation Area (OPCA). GE plans to initiate demolition of Buildings 63, 63X, and 68 in the 2008 construction season as part of its ongoing Brownfields program. As building demolition activities themselves are not part of the Removal Actions under the Consent Decree (CD) and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW), this letter presents a general description of GE's anticipated demolition activities for these buildings. However, this letter presents, for EPA approval, GE's proposed plans for the consolidation of certain building demolition debris at the Hill 78 OPCA. In addition, this letter serves to notify EPA of the anticipated ambient air monitoring station locations associated with demolition and restoration activities at Buildings 63, 63X, and 68.

Pre-Demolition Building Material Characterization Activities and Data

GE performed pre-demolition characterization activities for Buildings 63 and 63X on March 25, 2008. (Note: Building 63 was constructed in 1940 and Building 63X was constructed as an addition to Building 63 in 1944. Buildings 63 and 63X comprise one single building encompassing approximately 59,000 square feet.) GE notified EPA in advance of the sampling activities, and an EPA representative was present during the sampling activities. That program involved the collection of samples of concrete/cinder block walls from 12 locations for analysis of polychlorinated biphenyls (PCBs), as well as analysis of two composite samples of concrete/cinder block wall materials, using the Toxicity Characteristic Leaching Procedure (TCLP), for volatile organic compounds, semi-volatile organic compounds, and metals subject to TCLP regulatory limits under the Resource Conservation and Recovery Act (RCRA). No samples were collected from Building 68 because all above-grade demolition debris from Building 68 will be disposed of at an appropriate off-site disposal facility. In addition, no samples were collected from the concrete floor slabs of Buildings 63, 63X, and 68 because those slabs will not be removed as part of the demolition activities scheduled for 2008. Rather, applicable portions of the remaining concrete floor slabs will be addressed as part of future remediation for the East Street Area 2-South Removal Action Area.

The March 2008 characterization activities at Buildings 63 and 63X were performed consistent with the procedures summarized in the document titled *Protocols for Building Demolition and Associated Characterization Activities* (Demolition Protocols), the most recent version of which was submitted to EPA on March 30, 2007 [as Exhibit A-1 to Attachment A to GE's *Project Operations Plan* (POP), which was approved by EPA on June 13, 2007]. Under the Demolition Protocols, initial characterization sampling of building materials subject to demolition (with the exception of wood block flooring and structural steel) is performed using an area-based approach, requiring the collection of one sample for every 5,000 square feet of floor area for analysis of PCBs and one sample for every 50,000 square feet of floor area for TCLP analysis. In addition, the Demolition Protocols provide the minimum number of samples that must be collected per floor of each building for PCB and TCLP analyses to determine if the building materials are suitable for disposition at the Hill 78 OPCA. The March 2008 characterization sampling activities at Buildings 63 and 63X were performed in accordance with these Demolition Protocols, with the exception that, as noted above, no samples were collected from the concrete floor slabs. The locations at which the discrete PCB samples were collected are depicted on Figure 2. The two samples subject to TCLP analysis were composites of the seven samples from Building 63 (samples 63-1 through 63-7) and the five samples from Building 63X (samples 63X-1 through 63X-5), respectively.

The analytical results from the March 2008 sampling activities are presented in Table 1 (PCB data) and Table 2 (TCLP data). A review of the PCB data indicates that all of the 12 collected samples contained PCBs at concentrations well below 50 parts per million (ppm). Specifically, PCBs were detected at total concentrations ranging from 0.025 to 0.43 ppm. In addition, none of the results from the two composite samples subject to TCLP analysis exceeded the TCLP regulatory limits under RCRA. Therefore, the building materials from Buildings 63 and 63X meet the CD requirements for consolidation at the Hill 78 OPCA.

GE previously notified EPA of certain bulk concrete debris that is currently stockpiled in Building 63, but which was not sampled as part of the March 2008 building material sampling program. Based on discussions with EPA, GE conducted sampling of this bulk concrete debris on April 18, 2008, to determine its suitability for consolidation at the Hill 78 OPCA. This sampling effort consisted of collecting discrete core samples from all 95 individual pieces of concrete debris, and compositing every 5 discrete core samples for laboratory analysis of PCBs, yielding 19 composite samples for PCB analysis. In addition, one overall sample was composited from the 19 PCB composite samples for TCLP analysis. The PCB and TCLP analytical results from the concrete debris sampling activities are summarized in Tables 3 and 4, respectively. The PCB data show that all PCB concentrations from the 19 PCB samples were well below 50 ppm, ranging from 0.014 to 0.4 ppm, and the TCLP results showed no exceedances of the TCLP regulatory limits. Thus, this bulk concrete debris is also suitable for consolidation at the Hill 78 OPCA.

Demolition of Buildings 63, 63X, and 68

Following completion of pre-demolition activities (including, among other activities, asbestos abatement, equipment and liquids removal, etc.), the buildings will be demolished using conventional construction equipment and practices, with appropriate ambient air monitoring and dust control measures performed during the demolition activities. Prior to initiating demolition activities, GE will also abandon or relocate utilities (e.g., former process supply lines, sanitary sewer lines, storm sewer lines, potable and fire water supply lines, etc.) as necessary to facilitate building demolition. Subsurface excavation activities (if any) associated with the abandonment or relocation of subsurface utilities will be addressed separately under a Pre-Excavation Notification letter. In addition, restoration of the post-demolition area (e.g., backfilling of vaults, pits, tunnels; pavement patching/repair; placement of soil cover) will be coordinated with future Removal Action activities at East Street Area 2-South.

Ambient air monitoring for PCBs and particulate matter will be conducted during these building demolition and restoration activities in accordance with GE's Ambient Air Monitoring Plan (Attachment D to the POP). The anticipated locations of the ambient air monitoring stations to be used during these activities are shown on Figure 3. During each day of work, particulate monitoring will be conducted at two of these four locations, selected to be the most representative depending on where work is taking place and other conditions (e.g., wind direction) on that day. PCB monitoring will be conducted during two 24-hour periods prior to the start of demolition activities and at a frequency of approximately one 24-hour monitoring event for every four weeks of building demolition/restoration activities. All four air sampling locations will be monitored during each PCB air sampling event. In addition, a background air monitoring station for both PCBs and particulate matter will be located and operated north of Building 9B near New York Avenue at the GE Plant site.

Building Demolition Material Disposition

As discussed above, the analytical results from the building material samples collected in March 2008 from the above-grade building materials at Buildings 63 and 63X, as well as the results from the April 2008 sampling of the bulk concrete debris stockpiled in Building 63, indicate that these materials meet the standards in the CD and SOW for consolidation at the Hill 78 OPCA (i.e., total PCB concentrations below 50 ppm and no material that would constitute hazardous waste under RCRA). Therefore, GE proposes to consolidate these materials (including the bulk concrete debris) at the Hill 78 OPCA. However, in the event that the Hill 78 OPCA has insufficient capacity, any debris unable to be placed there will be disposed of at an appropriate off-site disposal facility. In addition, the demolition material from Building 68 will be disposed of at an appropriate off-site disposal facility.

Consolidation of the demolition and bulk concrete debris at the Hill 78 OPCA will be conducted consistent with the provisions contained in the CD and SOW regarding use of the OPCA, as well as the Demolition Protocols. Specifically, GE will not consolidate at the OPCA free liquids, intact drums or other equipment that contains liquid PCBs, or asbestos-containing material required by applicable law to be removed from structures prior to demolition. Materials deemed unsuitable for placement at the OPCA will be disposed of at an appropriate off-site disposal facility. The transport, handling, placement, and grading of the debris at the OPCA will be performed in a manner consistent with GE's practices during other Brownfields demolition projects and in accordance with all applicable OPCA requirements, including GE's *2006 Addendum to OPCA Work Plan.*

Based on the above, GE requests EPA's approval for GE's plan to consolidate the demolition debris from Buildings 63 and 63X, as well as the bulk concrete debris stockpiled in Building 63, at the Hill 78 OPCA. Following EPA's approval, GE will finalize its project planning and proceed with the demolition and subsequent site restoration of Buildings 63, 63X, and 68.

If EPA has any comments or questions concerning this letter, please contact me at your earliest convenience.

Sincerely,

Michael Carroll/GDR

Michael T. Carroll
Manager, Pittsfield Remediation Programs

GDR/dac
Attachments

cc: T. Conway, EPA*
J. Kilborn, EPA
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A. Symington, MDEP
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J. Bieke, Goodwin Procter
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J. Nuss, ARCADIS
GE Internal Repositories
Public Information Repositories

(* without attachments)

ARCADIS

Tables

TABLE 1
PCB DATA - BUILDING MATERIALS

BUILDING 63 AND 63X CHARACTERIZATION SAMPLING
EAST STREET AREA 2 - SOUTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Sample ID	Date Collected	Aroclor-1016, -1221, -1232, -1248	Aroclor-1242	Aroclor-1254	Aroclor-1260	Total PCBs
63-1	3/25/2008	ND(0.032)	ND(0.032)	0.20	0.18	0.38
63-2	3/25/2008	ND(0.031)	ND(0.031)	0.087	0.035	0.122
63-3	3/25/2008	ND(0.031)	ND(0.031)	0.028 J	ND(0.031)	0.028 J
63-4	3/25/2008	ND(0.032)	0.045	0.026 J	ND(0.032)	0.071
63-5	3/25/2008	ND(0.029)	ND(0.029)	0.15	0.064	0.214
63-6	3/25/2008	ND(0.032) [ND(0.032)]	ND(0.032) [ND(0.032)]	0.11 [0.096]	0.045 [0.041]	0.155 [0.137]
63-7	3/25/2008	ND(0.032)	ND(0.032)	0.12	0.078	0.198
63X-1	3/25/2008	ND(0.030)	ND(0.030)	0.025 J	ND(0.030)	0.025 J
63X-2	3/25/2008	ND(0.15)	ND(0.15)	0.28	0.12 J	0.40
63X-3	3/25/2008	ND(0.030)	ND(0.030)	0.044	0.043	0.087
63X-4	3/25/2008	ND(0.031)	ND(0.031)	0.12	0.049	0.169
63X-5	3/25/2008	ND(0.031)	ND(0.031)	0.20	0.23	0.43

Notes:

1. Samples were collected by ARCADIS and submitted to SGS Environmental Services, Inc. for analysis of PCBs.
2. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.
3. Field duplicate sample results are presented in brackets.

Data Qualifiers:

J - Indicates an estimated value less than the practical quantitation limit (PQL).

TABLE 2
TCLP DATA - BUILDING MATERIALS

BUILDING 63 AND 63X CHARACTERIZATION SAMPLING
EAST STREET AREA 2 - SOUTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in parts per million, ppm)

Parameter / Sample ID: / Date Collected:	TCLP Regulatory Limits	63-C1 3/25/2008	63X-C1 3/25/2008
Volatile Organics			
1,1-Dichloroethene	0.7	ND(0.010)	ND(0.010)
1,2-Dichloroethane	0.5	ND(0.010)	ND(0.010)
2-Butanone	200	ND(0.25)	ND(0.25)
Benzene	0.5	ND(0.010)	ND(0.010)
Carbon Tetrachloride	0.5	ND(0.010)	ND(0.010)
Chlorobenzene	100	ND(0.010)	ND(0.010)
Chloroform	6	ND(0.010)	ND(0.010)
Tetrachloroethene	0.7	ND(0.010)	ND(0.010)
Trichloroethene	0.5	ND(0.010)	ND(0.010)
Vinyl Chloride	0.2	ND(0.010)	ND(0.010)
Semivolatile Organics			
1,4-Dichlorobenzene	7.5	ND(0.010)	ND(0.010)
2,4,5-Trichlorophenol	400	ND(0.010)	ND(0.010)
2,4,6-Trichlorophenol	2	ND(0.010)	ND(0.010)
2,4-Dinitrotoluene	0.13	ND(0.010)	ND(0.010)
Cresol	200	ND(0.010)	ND(0.010)
Hexachlorobenzene	0.13	ND(0.010)	ND(0.010)
Hexachlorobutadiene	0.5	ND(0.010)	ND(0.010)
Hexachloroethane	3	ND(0.010)	ND(0.010)
Nitrobenzene	2	ND(0.010)	ND(0.010)
Pentachlorophenol	100	ND(0.050)	ND(0.050)
Pyridine	5	ND(0.010)	ND(0.010)
Inorganics			
Arsenic	5	0.0427 B	0.0318 B
Barium	100	0.717 B	0.901 B
Cadmium	1	0.0304 B	0.0284 B
Chromium	5	0.0288 B	0.0344 B
Lead	5	0.100	ND(0.100)
Mercury	0.2	0.000260 B	0.000117 B
Selenium	1	0.0774 B	ND(0.200)
Silver	5	0.0433 B	0.0354 B

Notes:

1. Samples were collected by ARCADIS and submitted to SGS Environmental Services, Inc. for analysis of TCLP constituents.
2. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.
3. Sample ID 63-C1 is a composite sample consisting of building material from discrete sample locations 63-1 through 63-7.
4. Sample ID 63-XC1 is a composite sample consisting of building material from discrete sample locations 63X-1 through 63X-5.

Data Qualifiers:

Inorganics

B - Indicates an estimated value between the instrument detection limit (IDL) and (PQL).

TABLE 3
PCB DATA - CONCRETE DEBRIS

BUILDING 63 AND 63X CHARACTERIZATION SAMPLING
EAST STREET AREA 2 - SOUTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Sample ID	Date Collected	Aroclor-1016, -1221, -1232, -1242, -1248	Aroclor-1254	Aroclor-1260	Total PCBs
CD-1	4/18/2008	ND(0.032)	0.082	ND(0.032)	0.082
CD-2	4/18/2008	ND(0.032) [ND(0.032)]	0.025 J [0.022 J]	ND(0.032) [ND(0.032)]	0.025 J [0.022 J]
CD-3	4/18/2008	ND(0.031)	0.035	ND(0.031)	0.035
CD-4	4/18/2008	ND(0.030)	0.014 J	ND(0.030)	0.014 J
CD-5	4/18/2008	ND(0.032)	0.030 J	ND(0.032)	0.030 J
CD-6	4/18/2008	ND(0.031)	0.022 J	ND(0.031)	0.022 J
CD-7	4/18/2008	ND(0.032)	0.041	ND(0.032)	0.041
CD-8	4/18/2008	ND(0.031)	0.10	ND(0.031)	0.10
CD-9	4/18/2008	ND(0.030)	0.026 J	ND(0.030)	0.026 J
CD-10	4/18/2008	ND(0.031)	0.045	ND(0.031)	0.045
CD-11	4/18/2008	ND(0.031)	0.031	ND(0.031)	0.031
CD-12	4/18/2008	ND(0.031)	0.043	ND(0.031)	0.043
CD-13	4/18/2008	ND(0.032)	0.070	0.18	0.25
CD-14	4/18/2008	ND(0.030)	0.070	ND(0.030)	0.070
CD-15	4/18/2008	ND(0.031)	0.26	0.063	0.323
CD-16	4/18/2008	ND(0.030)	0.29	0.11	0.40
CD-17	4/18/2008	ND(0.030)	0.034	ND(0.030)	0.034
CD-18	4/18/2008	ND(0.032)	0.096	0.044	0.14
CD-19	4/18/2008	ND(0.030)	0.080	0.028 J	0.108

Notes:

1. Samples were collected by ARCADIS and submitted to SGS Environmental Services, Inc. for analysis of PCBs.
2. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.
3. Field duplicate sample results are presented in brackets.

Data Qualifiers:

J - Indicates an estimated value less than the practical quantitation limit (PQL).

TABLE 4
TCLP DATA - CONCRETE DEBRIS

BUILDING 63 AND 63X CHARACTERIZATION SAMPLING
EAST STREET AREA 2 - SOUTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in parts per million, ppm)

Parameter / Sample ID: / Date Collected:	TCLP Regulatory Limits	CD-20 4/18/2008
Volatile Organics		
1,1-Dichloroethene	0.7	ND(0.010)
1,2-Dichloroethane	0.5	ND(0.010)
2-Butanone	200	ND(0.25)
Benzene	0.5	ND(0.010)
Carbon Tetrachloride	0.5	ND(0.010)
Chlorobenzene	100	ND(0.010)
Chloroform	6	ND(0.010)
Tetrachloroethene	0.7	ND(0.010)
Trichloroethene	0.5	ND(0.010)
Vinyl Chloride	0.2	ND(0.010)
Semivolatile Organics		
1,4-Dichlorobenzene	7.5	ND(0.0060)
2,4,5-Trichlorophenol	400	ND(0.0060)
2,4,6-Trichlorophenol	2	ND(0.0060)
2,4-Dinitrotoluene	0.13	ND(0.0060)
Cresol	200	ND(0.0060)
Hexachlorobenzene	0.13	ND(0.0060)
Hexachlorobutadiene	0.5	ND(0.0060)
Hexachloroethane	3	ND(0.0060)
Nitrobenzene	2	ND(0.0060)
Pentachlorophenol	100	ND(0.031)
Pyridine	5	ND(0.0060)
Inorganics		
Arsenic	5	ND(0.200)
Barium	100	0.632 B
Cadmium	1	0.0320 B
Chromium	5	0.140
Lead	5	0.100
Mercury	0.2	ND(0.000570)
Selenium	1	ND(0.200)
Silver	5	0.0282 B

Notes:

1. Samples were collected by ARCADIS and submitted to SGS Environmental Services, Inc. for analysis of TCLP constituents.
2. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.
3. Sample ID CD-20 is a composite sample consisting of building material from discrete sample locations CD-1 through CD-19.

Data Qualifiers:

Inorganics

B - Indicates an estimated value between the instrument detection limit (IDL) and (PQL).

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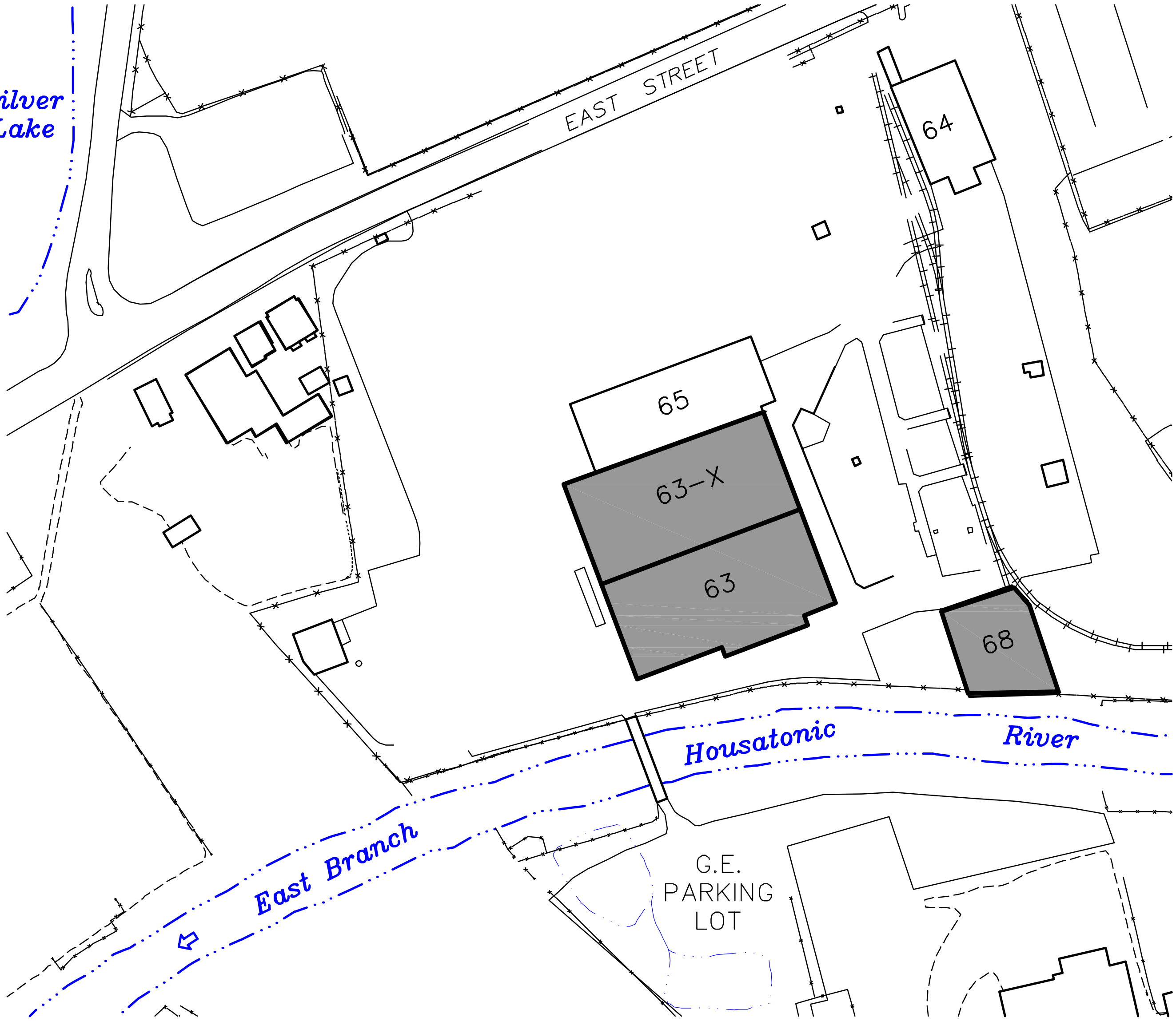
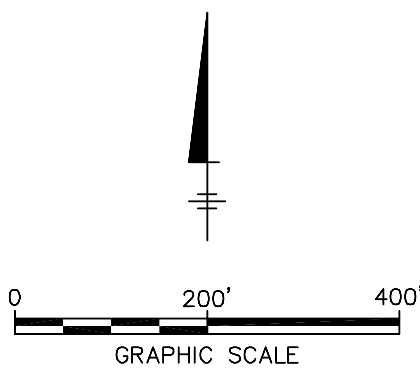
Figures





NOTES:

1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC 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. ALL LOCATIONS ARE APPROXIMATE.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
DEMOLITION AND SITE RESTORATION PROGRAM

BUILDINGS 63, 63X, AND 68
LOCATION PLAN

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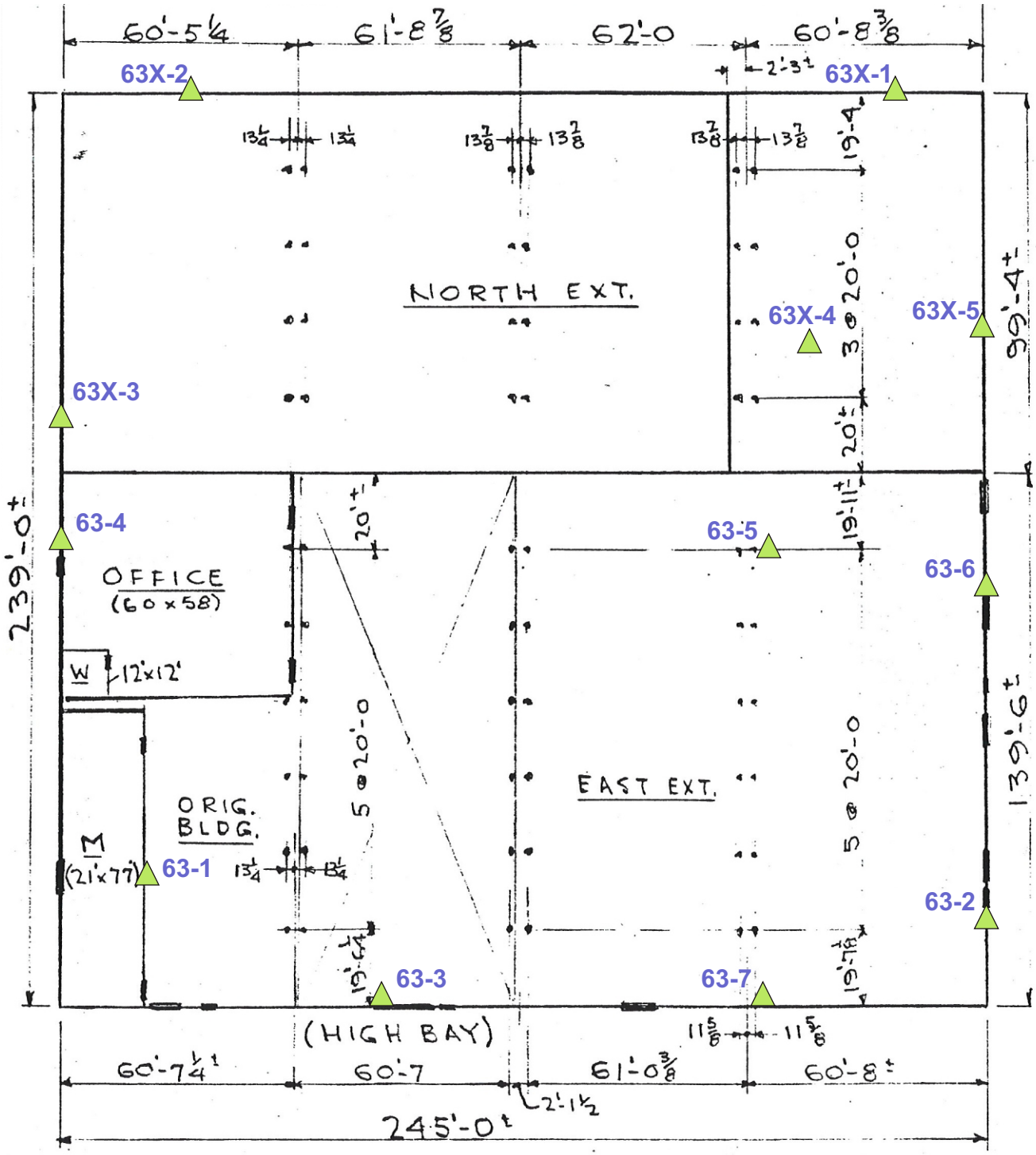
FIGURE
1



LEGEND:

Core Sample Location = 63-1

NOTES:

1. The general layout for this figures was obtained from a sketch prepared by the General Electric Company titled "Drawing no. K-9254463, Sheet No. 1, Floor Plan Bldg. 63."
2. Sample locations shown correspond to samples that were collected during pre-demolition characterization sampling activities on March 25, 2008.
3. Locations are approximate.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

DEMOLITION AND SITE RESTORATION PROGRAM

BUILDINGS 63 AND 63X SAMPLING LOCATIONS

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FIGURE
2

04/17/08 SYR-141ENV-DJH-KLS
C/B0031018/0000/00001/CDR/31018G01.CDR

CITY: SYRACUSE DIV/GROUP: 141 DB: LAF LD: DMW PIC: PM: G.ROSTER TM: LYR: ON=*;OFF=*REF*
G:\CAD\GE-CAD\C-ACT\B003101B\0000\00001\DWG\DEMO\31018G03.DWG LAYOUT: 3 SAVED: 4/30/2008 1:44 PM ACADVER: 17.0S (LMS TECH) PAGESETUP: C-LA-PDF PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 4/30/2008 1:44 PM BY: FORAKER, LYDIA
XREFS: IMAGES: PROJECTNAME: —
31018X01

LEGEND:

- APPROXIMATE AMBIENT AIR MONITORING STATION LOCATION
- BUILDINGS SUBJECT TO DEMOLITION
- FORMER BUILDING LOCATION

NOTES:

1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC 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. ALL LOCATIONS ARE APPROXIMATE.
5. 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.
6. A BACKGROUND AMBIENT AIR MONITORING STATION WILL BE LOCATED AND OPERATED NORTH OF BUILDING 9B NEAR NEW YORK AVENUE ON THE GE PROPERTY.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
DEMOLITION AND SITE RESTORATION PROGRAM

LOCATIONS OF AMBIENT AIR MONITORING STATIONS

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FIGURE
3