



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

01 - 0776

July 22, 2004

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

Via Facsimile and U.S. Mail

Re: Conditional Approval of General Electric's 26 February 2004 submittal *Pre-Design Investigation Work Plan for the Hill 78 Area - Remainder*, Housatonic River Project Site, Pittsfield, Massachusetts

Dear Mr. Silfer

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Pre-Design Investigation Work Plan for the Hill 78 Area - Remainder* (Work Plan). 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 submittal subject to the following conditions:

Conditions

1. The City of Pittsfield storm water drainage and sewer lines extend from Tyler Street under the Hill 78 OPCA and the Hill 78 Area-Remainder Response Action Area (RAA). Leaks or breaks in the lines could be a potential problem for the Hill 78 Landfill cap (i.e., settlement) or the Hill 78 RAA and related GMA-4 (i.e., releases). GE shall evaluate the integrity of these lines in connection with the Hill 78 OPCA study, the Hill 78 RAA or the GMA-4 monitoring program, as appropriate.
2. Previous groundwater investigations have indicated that a chlorobenzene plume and a chlorinated solvents plume have been identified in the area of the Hill 78 OPCA, extending below the Gas Turbine Generator Building and the Steam Turbine Generator Building. The chlorobenzene plume extends beyond the southern boundary of the RAA. GE shall indicate that these volatile organic compounds have been detected within the boundary of the RAA and discuss any potential source areas, such as the Hill 78 landfill, either in the revised Hill 78 RAA workplan, the Hill 78 OPCA reports or the GMA-4 monitoring reports, as

appropriate.

3. In Section 3.2 of the Work Plan, GE proposes evaluating the non-GE-owned Parcel K11-7-1 as a separate averaging area utilizing the Performance Standards applicable to the non-GE-owned commercial/industrial parcels at Unkamet Brook and East Street Area 1-North with an ERE. In Section 3.3 of the Work Plan, GE proposes to perform PCB soil characterization on an approximate 50-foot grid for the 0- to 1-foot depth interval and on an approximate 100-foot grid for the subsurface depth intervals. The Agencies agree with this sampling approach, subject to the following modifications. Proposed boring RAA9-K9 shall be moved approximately 15 feet southeast to the corner of the parcel boundary. Proposed boring RAA9-L11 shall be moved ~ 10' to the west to parcel boundary. These moves will enable PCB data from these borings to be utilized for both averaging areas. Surface soil sample location RAA9-LM10.5 at the southern boundary of the parcel shall be converted to a soil boring.
4. In Subsection 4.3.1 of the Work Plan, GE's evaluation of existing historical soil data has led to the rejection of several soil samples where PCBs were detected at high concentrations (greater than 500 ppm). Although the Agencies agree that these samples should be rejected, GE shall shift the locations of certain proposed boring locations to resample at these locations and depths. Specifically, GE shall shift proposed boring RAA9-J9 south to prior boring location 2N, and shift proposed boring RAA9-L17 northeast near prior boring location L-7.
5. In Section 4.4 of the Work Plan, GE indicates that several proposed sample locations were moved from grid nodes and two proposed samples were added to address utility characterization as part of the pre-design investigation. It appears that, within the utility corridor to the west of the Steam Turbine Generator Building, proposed sample location RAA9-J12 is approximately 190 ft from proposed sample location RAA9-L13. GE shall move proposed sample location RAA9-K12 approximately 25 ft to the east into the utility corridor. It appears that, within the utility corridor to the north of the Steam Turbine Generator Building, proposed sample location RAA9-H16 is approximately 200 ft from proposed sample location RAA9-H18. GE shall add a boring at location RAA9-H17. It appears that, within the utility corridor to the east of Building 78, proposed sample location RAA9-F6 is approximately 210 ft from RAA9-H7. GE shall move boring RAA9-G7 approximately 25 ft to the west into the utility corridor.
6. A "paved" parking lot is located in the southeast corner of the RAA. EPA has recently reviewed the extent and condition of paved areas within the designated parking lot and does not agree with GE's presentation of "paved areas" as depicted in Figure 4. Specifically, EPA has observed significant areas of the parking lot where the pavement has deteriorated to such an extent that dirt is exposed and grass/weeds are actively growing. There are also several unpaved berms with

grass or other established plantings present. EPA does not consider this former parking lot area to be "paved" for the purposes of establishing sampling requirements. EPA proposes the following three options to address this concern:

- GE shall sample this parking lot by applying a grid at the frequency required for "unpaved industrial GE-owned areas;" or
- GE shall pave all of the non-bermed areas and add the following soil boring locations within the unpaved berms of this parking lot area for PCB analysis from the appropriate intervals: RAA9-I22, RAA9-J22, RAA9-J20, and RAA9-K19; or
- GE shall pave the entire parking lot area, including the unpaved berms, so that the sampling strategy as proposed in the PDI workplan is sufficient to address this paved area.

In lieu of implementing one of the above options at this time, GE may perform the initial sampling of the parking lot as proposed in the PDI workplan. The results of that effort will then be used to determine whether remediation of that area and/or whether additional characterization data is necessary - - and which of the three options (or others identified based on the sampling results) - - may be appropriate.

7. In Section 4.4 of the Work Plan, GE does not propose analyses for pesticides or herbicides as part of the pre-design investigation and suggests the presence of these compounds are most likely attributable to the application of weed and pest control materials. EPA agrees that pesticides and herbicides are not likely to be a constituent of concern in soil in the Hill 78 Area-Remainder and sampling for these constituents will not be required in the pre-design investigation. However, the prior detections of pesticides and herbicides in certain surficial samples in drainage routes from the Hill 78 Landfill indicate that the three drainage swales within the Hill 78 Area-Remainder may require additional investigations. Currently, GE does not propose any sampling to be conducted for PCBs or Appendix IX+3 constituents within Drainage Swales A, B or C. To address this data need, GE shall add surface soil sampling locations to be analyzed for PCBs and Appendix IX+3 constituents (excluding pesticides and herbicides) at the following locations: near former boring location SE-1 in Drainage Swale A; north of grid node RAA9-L15 in Drainage Swale B; and west of grid node RAA9-J18 in Drainage Swale C.
8. In addition to the abovementioned PCB samples, GE shall move or add non-PCB Appendix IX+3 soil boring locations that correspond to historical locations of elevated levels of PCBs, PAHs, and VOCs (for which that data were rejected). GE shall modify the Appendix IX+3 sampling locations as follows; shift the

Appendix IX+3 sample from 0- to 1- foot to 1- to 6- feet at relocated boring RAA9-L17 (at former boring L-7); move the Appendix IX+3 sample from 1- to 6- feet at boring RAA9-F20 to boring RAA9-F18; and move the Appendix IX+3 sample from 0- to 1-foot at boring RAA9-G20 to boring RAA9-G18.

GE shall prepare an Addendum to the Pre-Design Investigation Work Plan, consisting of revised tables and figures and indicating the proposed sampling locations, as modified based on the conditions contained herein. That addendum shall be submitted for EPA and DEP approval within 30 days of the date of this letter.

If there is any conflict between the Performance Standards as described in the Report and as set forth in the Consent Decree and/or Statement of Work for Removal Actions Outside the River (Appendix E to the Consent Decree), the Statement of Work shall control. EPA reserves its right to perform additional sampling in the areas subject to proposal and/or require additional sampling or response actions, if necessary, pursuant to the Consent Decree.

If you have any questions, please contact me at (617) 918-1247.

Sincerely,



James M. DiLorenzo
USEPA Remedial Project Manager

cc: John Novotny, GE
James Bieke, Shea & Gardner
Jim Nuss, BB&L
Sue Steenstrup, MDEP
Dean Tagliaferro, USEPA
Michael Nalipinski, USEPA
Holly Inglis, US EPA
Rose Howell, US EPA
Tim Conway, US EPA
John Kilborn, US EPA
K.C. Mitkevicius, USACE
Dawn Jamros, Weston Solutions, Inc.
Joe Mastone, Weston Solutions, Inc.
Pittsfield MA Office, US EPA
Mayor James Ruberto, City of Pittsfield
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