



GE
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USA

Transmitted Via Overnight Delivery

May 11, 2006

Ms. Sharon M. Hayes
U.S. Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
Hill 78 Area-Remainder (GECD160)
Supplemental Sampling Proposal**

Dear Ms. Hayes:

On September 7, 2005, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a document titled *Hill 78 Area-Remainder Pre-Design Investigation Report* (PDI Report). The PDI Report was prepared in accordance with the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site, and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW). The associated field activities were described in the *Pre-Design Investigation Work Plan for Hill 78 Area-Remainder* (February 2004), and the *Pre-Design Investigation Work Plan Addendum* (August 2004), as conditionally approved by EPA. In the PDI Report, GE proposed that it perform certain additional soil investigations and present the results to EPA in a Supplemental Data Letter.

EPA conditionally approved the PDI Report in a letter dated April 13, 2006. Three conditions set forth in that letter required GE to perform certain sampling activities in addition to those proposed in the PDI Report and to submit this Supplemental Sampling Proposal to propose the required sampling. The April 13, 2006 conditional approval letter also required GE to propose a new schedule for submission of the Supplemental Data Letter reporting on the results of that sampling and addressing the remaining conditions set forth in the conditional approval letter.

This Supplemental Sampling Proposal addresses the relevant EPA conditions and summarizes the modified scope of the approved supplemental pre-design investigations based on those conditions. In addition, this letter proposes certain additional sampling based on GE's further review of the available data. The attached Table 1 summarizes all of the proposed supplemental sampling locations and the analyses to be performed on each sample (including the sampling that had previously been proposed in the PDI Report and approved by EPA, the sampling required by the April 13, 2006 conditional approval letter, and the additional sampling now being proposed by GE), and Figure 1 illustrates the proposed supplemental sample locations. Finally, this letter contains a proposed schedule for the performance of the proposed field and reporting activities related to the Hill 78 Area-Remainder described herein. All of the proposed samples will be collected and analyzed as specified in the approved FSP/QAPP.

Previously Proposed Supplemental Sampling Activities

As described in the PDI Report, based on a review of the existing PCB data, GE identified the need for additional soil sampling at four locations along the southern boundary of the RAA (RAA9-X1, RAA9-X2, RAA9-X3, and RAA9-X4; Figure 1) to further assess the extent of PCBs exceeding 2 ppm, and supplemental sampling activities at these locations were proposed in the PDI Report. In addition, GE proposed to return to locations RAA9-K4, RAA9-M6, and RAA9-N5 (where refusal was met during the initial sampling attempts) to attempt to collect samples from the 6- to 15-foot depth interval for PCB analysis to satisfy the pre-design characterization requirements. If these samples again cannot be collected at the grid nodes, GE has proposed to sample from alternate locations located to the west of each node. These previously approved supplemental sample locations are illustrated on Figure 1 and the analyses to be conducted for each sample depth are listed in Table 1.

EPA-Required Supplemental Sampling Activities

In the April 13, 2006 conditional approval letter, EPA included three conditions that require additional sampling and analysis activities at the Hill 78 Area-Remainder. GE proposes the following sampling and analysis to fulfill these requirements:

- In Condition 4, EPA states that an additional sample is required from the 6- to 15- foot depth increment at location RAA9-I14, which is approximately mid-way between sample locations RAA9-I12 and RAA9-H16, to provide an even spatial distribution of samples for Appendix IX+3 constituents for this depth increment. To address this data need, GE will collect a soil sample from the 6- to 15- foot depth increment at location RAA9-I14 to be analyzed for Appendix IX+3 constituents, excluding pesticides and herbicides.
- In Condition 5, EPA requires additional characterization within the GE-owned parking lot located on the southeast corner of the RAA. Specifically, the condition requires that GE sample and analyze soil beneath the parking lot for PCBs and Appendix IX+3 constituents on a grid basis, utilizing the sampling frequency required for unpaved GE-owned industrial areas. To address this condition, GE proposes to collect surface soil (i.e., 0- to 1-foot depth) and subsurface soil samples (i.e., 1- to 6-foot and 6- to 15-foot depth increments) to supplement available data and provide sampling on an approximate 100-foot sampling grid over the parking lot area. Ten new soil borings are proposed to be installed within the parking lot area. From these borings; 27 samples will be analyzed for PCBs; and 10 samples will be analyzed for Appendix IX+3 constituents, excluding pesticides and herbicides. The sample locations are illustrated on Figure 1 and the proposed sampling depths and analyses are identified in Table 1.
- In Condition 7, EPA requires sampling in the vicinity of the storm sewer and Swales A and B. To address this condition, GE will collect four surface water samples and six sediment samples for PCB and Appendix IX+3 analyses (excluding pesticides and herbicides) at the locations identified by EPA (illustrated on Figure 1). The proposed sample parameters and depths are summarized in Table 1.

Assessment of Potential Data Needs and Proposal for Additional Sampling

As discussed in the PDI Report, the site mapping for Hill 78 Area-Remainder available at the time that report was prepared was not sufficient to support future RD/RA evaluations and, therefore, GE indicated in the PDI Report that it would develop an overall detailed site map for this RAA. Since submittal of the PDI Report, GE has developed the detailed site map for Hill 78 Area-Remainder that was utilized in the preparation of this supplemental sampling proposal. Following completion of the site mapping activities described above, as well as the anticipated future modifications to the limits of the Hill 78 OPCA (to be documented in the forthcoming 4th CD modification now under discussion between EPA and GE), some data gaps have been identified and additional sampling is proposed to provide the necessary data.

As shown on Figure 1, GE has identified certain unpaved locations along the northern perimeter of the RAA where the grid nodes are adjacent to the edge of pavement and/or where modifications to the extent of the Hill 78 OPCA has resulted in additional areas within the Hill 78 Area-Remainder that require characterization. Moreover, there is an underground utility corridor east of the intersection of Tyler Street Extension and New York Avenue that should be characterized for PCBs. Therefore, GE proposes to install six additional soil borings along the northern perimeter of the RAA and collect 15 samples for analysis for PCBs and three soil samples for analysis for Appendix IX+3 constituents, excluding pesticides and herbicides, as indicated on Table 1. These borings will complete the grid sampling requirements at the unpaved locations and the proposed boring at location RAA9-G2 will also be utilized to characterize conditions within the utility corridor east of the intersection of Tyler Street Extension and New York Avenue.

In addition, at the southern perimeter of the RAA, GE has identified one location in an unpaved area where the grid node is slightly outside the RAA boundary (at location RAA9-N8) and another underground utility corridor east of the intersection of Merrill Road and New York Avenue that should be characterized for PCBs. Therefore, GE proposes to install soil borings at locations RAA9-N8 and RAA9-NO-5.5 and collect five samples for analysis for PCBs and one soil sample for analysis for Appendix IX+3 constituents, excluding pesticides and herbicides, as indicated on Table 1.

If during the course of performing RD/RA evaluations for the RAA, GE identifies the need for other data to support a potential response action, GE will propose additional sampling to EPA for review and approval.

Response to Other EPA Approval Conditions

Five of the approval conditions contained in EPA's April 13, 2006 letter (i.e., Conditions 1, 2, 3, 6, and 8) requested that clarifications or additional information be provided in the Supplemental Data Letter that will be submitted following completion of the supplemental sampling activities. GE will provide the information required in those conditions in the Supplemental Data Letter. GE notes, however, that a full-size site map of Hill 78 Area-Remainder, required to be prepared pursuant to Condition 8, is attached to this Supplemental Sampling Proposal.

In addition, in Condition 6, EPA has requested that GE complete the cleaning and video survey of the storm and sanitary sewers and present its findings in the Supplemental Data Letter, or sooner if possible. GE is in the process of scheduling a subcontractor to clean the storm sewer and has contacted the City of Pittsfield to arrange the cleaning of the sanitary sewer line beneath the Hill 78 OPCA. GE will continue to inform EPA of the progress of these activities, including the schedule for the field activities.

Future Activities and Schedule

GE will perform the sampling activities discussed above and submit the Supplemental Data Letter within 90 days from EPA's approval of this letter. If no additional data needs are identified based on the results of the supplemental sampling activities proposed herein or from GE's ongoing review of the existing data, that letter will also propose a schedule for the submittal of a Conceptual RD/RA Work Plan for the Hill 78 Area-Remainder Removal Action. If additional data needs are identified, GE will propose to conduct additional pre-design investigations to address those data needs.

Please contact John Novotny or me with any questions.

Sincerely,



John F. Novotny
Manager - Facilities and Brownfields Programs

Enclosure

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Public Information Repositories
GE Internal Repositories

**(Copy of letter only)*

TABLE 1
PROPOSED SUPPLEMENTAL SOIL SAMPLING LOCATIONS, DEPTHS, AND PARAMETERS
SUPPLEMENTAL PRE-DESIGN INVESTIGATION WORK PLAN FOR HILL 78 AREA-REMAINDER
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Sample ID	Sample Depth (ft.)	Analyses To Be Performed				
		PCBs	VOCs	SVOCs	Inorganics	PCDDs/PCDFs
PREVIOUSLY APPROVED SUPPLEMENTAL INVESTIGATIONS						
UNPAVED AREAS ON GE PROPERTIES						
RAA9-K4	6-15	X	--	--	--	--
RAA9-M6	6-15	X	--	--	--	--
RAA9-N5	6-15	X	--	--	--	--
RAA9-X1	0-1	X	--	--	--	--
RAA9-X2	0-1	X	--	--	--	--
	1-6	X	--	--	--	--
RAA9-X3	0-1	X	--	--	--	--
	1-6	X	--	--	--	--
RAA9-X4	0-1	X	--	--	--	--
EPA-REQUIRED SUPPLEMENTAL INVESTIGATIONS						
SURFACE WATER SAMPLE LOCATIONS						
RAA9-MHD2-SW	--	X	X	X	X	X
RAA9-J12S-SW	--	X	X	X	X	X
RAA9-L13E-SW	--	X	X	X	X	X
RAA9-K17-SW	--	X	X	X	X	X
SEDIMENT SAMPLE LOCATIONS						
RAA9-MHD2-SD	--	X	X	X	X	X
RAA9-H11W-SD	--	X	X	X	X	X
RAA9-K13W-SD	--	X	--	--	--	--
RAA9-L13N-SD	--	X	X	X	X	X
RAA9-L14W-SD	--	X	X	X	X	X
RAA9-K16S-SD	--	X	--	--	--	--
GE-OWNED PARKING LOT AT SOUTHEAST CORNER OF RAA AND UNPAVED AREAS ON GE PROPERTIES						
RAA9-H21	0-1	X	--	--	--	--
	1-6	X	--	--	--	--
	6-15	X	--	--	--	--
RAA9-I18	6-15	X	--	--	--	--
RAA9-I19	0-1	X	X	X	X	X
	1-6	X	X	X	X	X
	6-15	X	--	--	--	--
RAA9-I22	0-1	X	X	X	X	X
	1-6	X	--	--	--	--
	6-15	X	--	--	--	--
RAA9-J18	1-6	X	--	--	--	--
	6-15	X	--	--	--	--

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GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

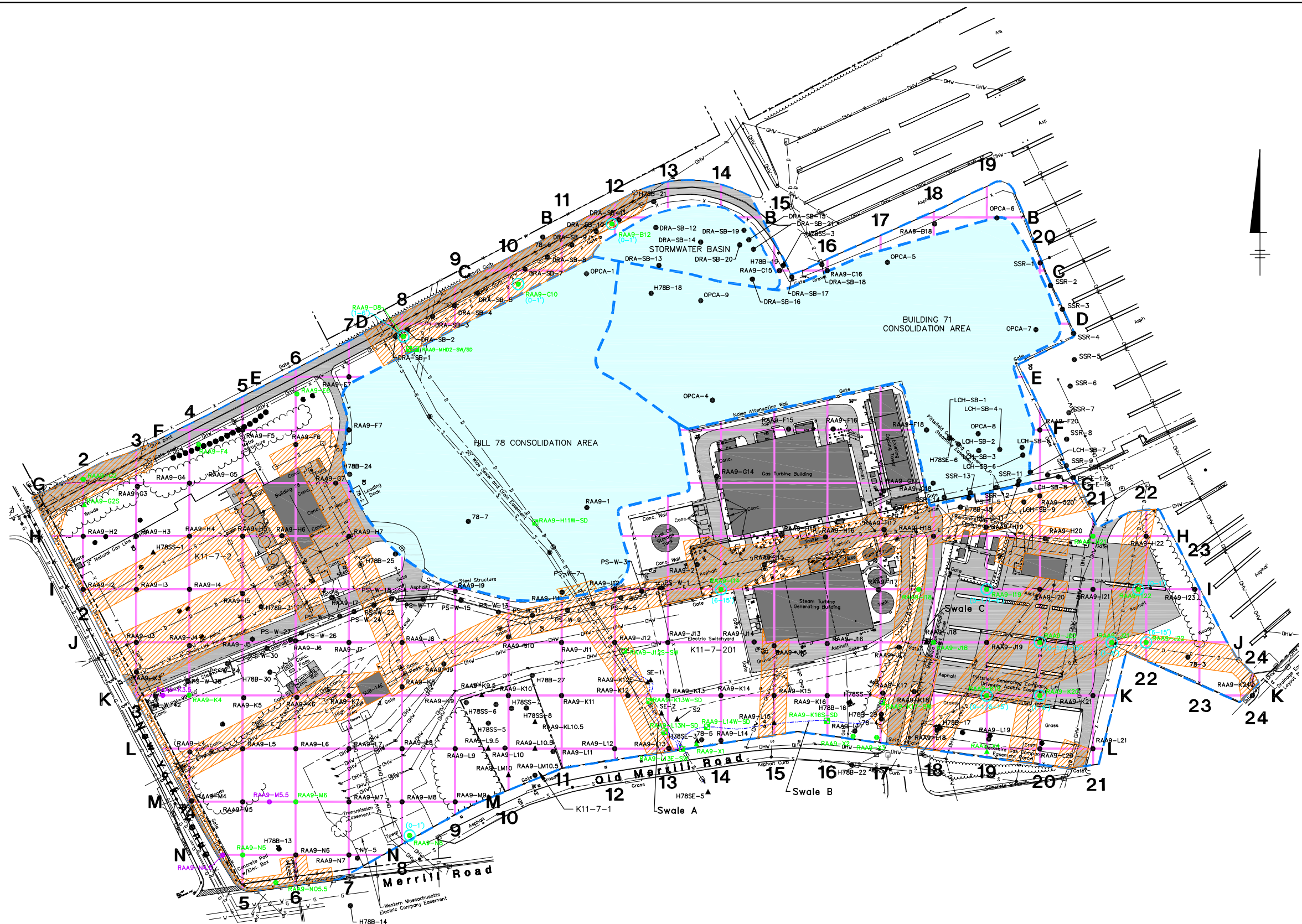
Sample ID	Sample Depth (ft.)	Analyses To Be Performed				
		PCBs	VOCs	SVOCs	Inorganics	PCDDs/PCDFs
GE-OWNED PARKING LOT AT SOUTHEAST CORNER OF RAA AND UNPAVED AREAS ON GE PROPERTIES						
RAA9-J20	0-1	X	X	X	X	X
	1-6	X	--	--	--	--
	6-15	X	X	X	X	X
RAA9-J21	0-1	X	--	--	--	--
	1-6	X	X	X	X	X
	6-15	X	--	--	--	--
RAA9-J22	0-1	X	--	--	--	--
	1-6	X	--	--	--	--
	6-15	X	X	X	X	X
RAA9-K19	0-1	X	X	X	X	X
	1-6	X	--	--	--	--
	6-15	X	X	X	X	X
RAA9-K20	0-1	X	--	--	--	--
	1-6	X	X	X	X	X
	6-15	X	--	--	--	--
PAVED AREAS ON GE PROPERTIES						
RAA9-I14	6-15	--	X	X	X	X
ADDITIONAL GE-PROPOSED SUPPLEMENTAL INVESTIGATIONS						
UNPAVED AREAS ON GE PROPERTIES						
RAA9-B12	0-1	X	X	X	X	X
	1-6	X	--	--	--	--
	6-15	X	--	--	--	--
RAA9-C10	0-1	--	X	X	X	X
	1-6	X	--	--	--	--
	6-15	X	--	--	--	--
RAA9-D8	1-6	--	X	X	X	X
	6-15	X	--	--	--	--
RAA9-E6	0-1	X	--	--	--	--
	1-6	X	--	--	--	--
	6-15	X	--	--	--	--
RAA9-F4	0-1	X	--	--	--	--
	1-6	X	--	--	--	--
	6-15	X	--	--	--	--
RAA9-G2S	0-1	X	--	--	--	--
RAA9-G2	1-6	X	--	--	--	--
	6-15	X	--	--	--	--

**TABLE 1
PROPOSED SUPPLEMENTAL SOIL SAMPLING LOCATIONS, DEPTHS, AND PARAMETERS
SUPPLEMENTAL PRE-DESIGN INVESTIGATION WORK PLAN FOR HILL 78 AREA-REMAINDER
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Sample ID	Sample Depth (ft.)	Analyses To Be Performed				
		PCBs	VOCs	SVOCs	Inorganics	PCDDs/PCDFs
UNPAVED AREAS ON GE PROPERTIES (Continued)						
RAA9-NO5.5	0-1	X	--	--	--	--
	1-6	X	--	--	--	--
RAA9-N8	0-1	X	X	X	X	X
	1-6	X	--	--	--	--
	6-15	X	--	--	--	--

Notes:

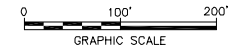
1. This table identifies soil samples to be collected and the analyses to be performed as part of the supplemental pre-design investigation at the Hill 78 Area-Remainder Removal Action Area.
2. The Appendix IX+3 sample intervals shown above may be modified in the field based on the results of photoionization detector (PID) readings and visual observations at the time of sample collection.
3. If GE is unable to obtain samples from locations RAA9-K4, RAA9-M6, and RAA9-N5, GE will then collect samples from three alternate locations to further characterize soils in the 6- to 15-foot depth interval: RAA9-K3.5 (located 50 feet west of RAA9-K4), RAA9-M5.5 (located 50 feet west of RAA9-M6), and RAA9-N4.5 (located 45 feet west of location RAA9-N5). Figure 1 shows the approximate location of these contingency PCB soil samples.



- LEGEND:**
- K11-7-2 PROPERTY ID
 - APPROXIMATE SITE BOUNDARY
 - HILL 78 AND BUILDING 71 CONSOLIDATION AREAS (NOT PART OF HILL 78 AREA-REMAINDER RAA)
 - PROPERTY LINE
 - EASEMENT LINE
 - FENCE LINE
 - EDGE OF SWALE
 - INDEX ELEVATION CONTOUR LINE
 - INTERMEDIATE ELEVATION CONTOUR LINE
 - EDGE OF WOODS
 - LIGHT POLE
 - UTILITY POLE
 - BUSH/TREE/SHRUB
 - GAS MARKER
 - MANHOLE
 - SANITARY MANHOLE
 - CATCH BASIN
 - DRAIN MANHOLE
 - ELECTRIC MANHOLE
 - WATER VALVE
 - FIRE HYDRANT
 - OHW OVERHEAD WIRE
 - D STORM SEWER (DRAINAGE) LINE
 - E UNDERGROUND ELECTRIC LINE
 - S SANITARY LINE
 - W WATER LINE
 - G GAS LINE
 - GE-OWNED PAVED AREA
 - BUILDING/STRUCTURE
 - APPROXIMATE LOCATION OF BAND SURROUNDING SUBSURFACE UTILITIES (25 FEET WIDE ON EACH SIDE OF UTILITY)
 - 78-7 • EXISTING PCB SOIL BORING LOCATION
 - H78SS-1 ▲ EXISTING PCB SURFACE SAMPLE LOCATION
 - RAA9-X3 ● PROPOSED PCB SOIL BORING LOCATION
 - RAA9-X2 ▲ PROPOSED PCB SURFACE WATER SAMPLE LOCATION (PCB & APPENDIX IX+3)
 - PROPOSED SEDIMENT SAMPLE LOCATION (PCB & APPENDIX IX+3)
 - PROPOSED APPENDIX IX+3 SOIL BORING LOCATION (WITH PROPOSED DEPTH(S) OF APPENDIX IX+3 SAMPLING INDICATED)
 - RAA9-K3.5 ● POTENTIAL/CONTINGENCY PCB SOIL BORING LOCATION

NOTES:

- MAPPING BASED ON ELECTRONIC FILE (S2149W01.DWG) OF SURVEY BY FORESIGHT LAND SERVICES, DATED 3/16/06. UTILITY LOCATIONS BASED ON AVAILABLE RECORD DATA AND VISIBLE FIELD EVIDENCE AND ARE NOT REPRESENTED AS BEING EXACT OR COMPLETE.



GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
SUPPLEMENTAL PRE-DESIGN INVESTIGATION
WORK PLAN FOR HILL 78 AREA-REMAINDER
PROPOSED SOIL
CHARACTERIZATION
SAMPLE LOCATIONS

FIGURE
1

X: 20464X07.DWG
 L: ON=*, OFF=*REF*, *GRID*
 P: PAGESET/SYR-DL
 5/10/06 SYR-85-DMW PGL
 C:/20464031/SUPPPDI/2046403.DWG