



GE
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Pittsfield, MA 01201
USA

Transmitted Via Overnight Delivery

February 16, 2007

Mr. Richard Hull
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 Mr. Hull:

On September 18, 2006, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a document titled *Hill 78 Area-Remainder (GECD160) Supplemental Data Letter* (Supplemental Data Letter). The Supplemental Data Letter summarized the work performed during supplemental pre-design investigations conducted at the Hill 78 Area-Remainder Removal Action Area (RAA) that were proposed in GE's *Hill 78 Area-Remainder Pre-Design Investigation Report* (PDI Report; September 2005), as conditionally approved by EPA in a letter dated April 13, 2006. The Supplemental Data Letter presented the results of the supplemental pre-design investigations, responded to other EPA requests for clarification/information, and proposed certain additional sampling and a schedule for future activities.

EPA conditionally approved the Supplemental Data letter in a letter dated January 5, 2007. Condition No. 5 of that letter required GE to expand the northern boundary of the RAA presented on figures included in the PDI Report and Supplemental Data Letter to match the RAA boundary prescribed in the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW) and to submit a proposal to meet the sampling requirements of the CD in the expanded area.

This letter contains a proposal to conduct additional soil sampling activities within the portion of the RAA to the north of Tyler Street Extension to satisfy the requirements of Condition No. 5 of EPA's January 5, 2007 letter. This letter also discusses the status of the sampling required by Condition Nos. 1 and 3 of that conditional approval letter. The results of that sampling will be addressed in a Second Supplemental Data Letter, to be submitted to EPA by March 21, 2007, along with the ownership and other information addressed by Condition No. 2 of EPA's January 5, 2007 letter. Condition 4 requires GE to incorporate data collected within the Hill 78 Area-Remainder RAA as part of its sewer relocation project into the Conceptual Removal Design/Removal Action (RD/RA) Work Plan for the RAA. A separate sampling proposal related to that project is being submitted concurrently with this proposal and applicable data (i.e., sample results from the top 15 feet below grade) from the sewer relocation sampling will be utilized during preparation of the Conceptual RD/RA Work Plan.

Sampling to Address Expansion of RAA Boundary

The revised RAA boundary is shown on attached Figure 1. As seen on that figure, extension of the 100-foot sampling grid utilized for characterization of PCBs in unpaved soils to the boundary along the north side of Tyler Street extension has resulted in additional grid nodes requiring sampling to meet the sampling requirements of the Consent Decree. Therefore, 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 satisfy an approximate 100-foot sampling grid over the unpaved portion of this area. Specifically, GE proposes to install seven new soil borings to the north of Tyler Street Extension. Twenty-one soil samples from these borings will be analyzed for PCBs; and 7 soil samples will be analyzed for Appendix IX+3 constituents, excluding pesticides and herbicides. Table 1 summarizes the proposed supplemental sampling locations and the analyses to be performed and the proposed soil boring locations are illustrated on Figure 1. All additional sampling will be performed in accordance with the FSP/QAPP. Based on the results from these samples, GE will evaluate the need for and scope of additional sampling.

Sampling to South of the RAA Boundary

This letter also confirms Condition No. 1 of EPA's January 5, 2007 letter, which required GE to identify two additional soil sampling locations between Old Merrill Road and soil sample locations RAA9-X2 and RAA9-X3 (designated RAA9-X2S and RAA9-X3S, respectively). That sampling was recently completed and the sample locations are also shown on Figure 1. GE collected samples from these locations and from previously-proposed locations RAA9-X5, RAA9-X6, and RAA9-X7, all at the 0 to 1' and 1 to 6' depth intervals on February 13, 2007. The samples from new locations RAA9-X2S and RAA9-X3S and location RAA9-X7 were analyzed for PCBs, while the samples from locations RAA9-X5 and RAA9-X6 are being held for PCB analysis, pending the results of the samples initially analyzed. GE will contact EPA following receipt of the initial analyses to discuss the need to analyze the contingency samples. The results of the analyses that are performed will be discussed along with the results of the other proposed sampling, as discussed below, in the Second Supplemental Data Letter.

Modification to Previously-Proposed Sampling at Location RAA9-B12

In accordance with Condition No. 3 of EPA's January 5, 2007 letter, GE has also sampled for PCBs at the 6 - 15' depth interval at sample location RAA9-B12. That sampling also has been completed, and the data will be discussed in the Second Supplemental Data Letter.

Future Activities and Schedule

As discussed above, a separate sampling proposal for the Hill 78-Remainder sewer line sampling/relocation project is being submitted concurrently with this proposal. That sampling is proposed to be performed 30 days after approval from EPA. The analytical data from the upper 15 feet collected during this sampling will be incorporated into the Conceptual RD/RA Work Plan.

As also discussed above, the supplemental sampling activities proposed by GE in the Supplemental Data Letter and additional sampling activities required by EPA at locations south of Tyler Street Extension have been completed. GE will submit a Second Supplemental Data letter, including the results of those investigations and other available and relevant information on the additional parcels that were sampled, by March 21, 2007, in accordance with the schedule set forth by EPA in its January 5, 2007 conditional approval letter.

GE plans to conduct the additional sampling proposed above, to address the expansion of the RAA boundary to the north, following EPA approval of this proposal. Prior to performance of the field activities, GE will provide EPA with 7 days advance notice to allow: (1) the assignment of field oversight personnel; (2) preparations to split samples with EPA's contractor (if desired); and (3) review of the sampling locations by EPA's field representatives in the event that the proposed boring locations illustrated on Figure 1 are modified due to physical access limitations or the presence of underground utility lines in this area. The analytical results from this soil characterization sampling will be presented in a Third Supplemental Data Letter to be submitted within 75 days following EPA approval of this proposal. The preliminary analytical results from the soil samples will also be provided in the CD Monthly Status Report that follows receipt of those results.

If no additional data needs are identified based on the results of the supplemental sampling activities proposed herein or based on data collected during the sewer line sampling/relocation project, the Third Supplemental Data 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 Andrew Silber or me with any questions.

Sincerely,



Richard W. Gates
Remediation Project Manager

Attachments

V:\GE_Pittsfield_CD_Hill_78_Remainder\Reports and Presentations\3rd Supp PDI Prop\095711222Ltr.doc

cc: Tim Conway, EPA *
Dean Tagliaferro, EPA
Holly Inglis, EPA
Rose Howell, EPA *
Robert Cianciarulo, EPA *
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Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP *
Jane Rothchild, MDEP *
Thomas Angus, MDEP *
Nancy E. Harper, MA AG *
Dale Young, MA EOE
Mayor James Ruberto, City of Pittsfield
Pittsfield Commissioner of Public Health
Thomas Hickey, Director, PEDA
Jeffrey Bernstein, Bernstein, Cushner & Kimmel
Theresa Bowers, Gradient
Michael Carroll, GE *
Rod McLaren, GE *
Andrew Silber, GE
James Nuss, ARCADIS BBL

James Bieke, Goodwin Procter
Tim Eglin, Pureenergy I, LLC
Public Information Repositories
GE Internal Repositories

**(Copy of letter only)*

Attachments

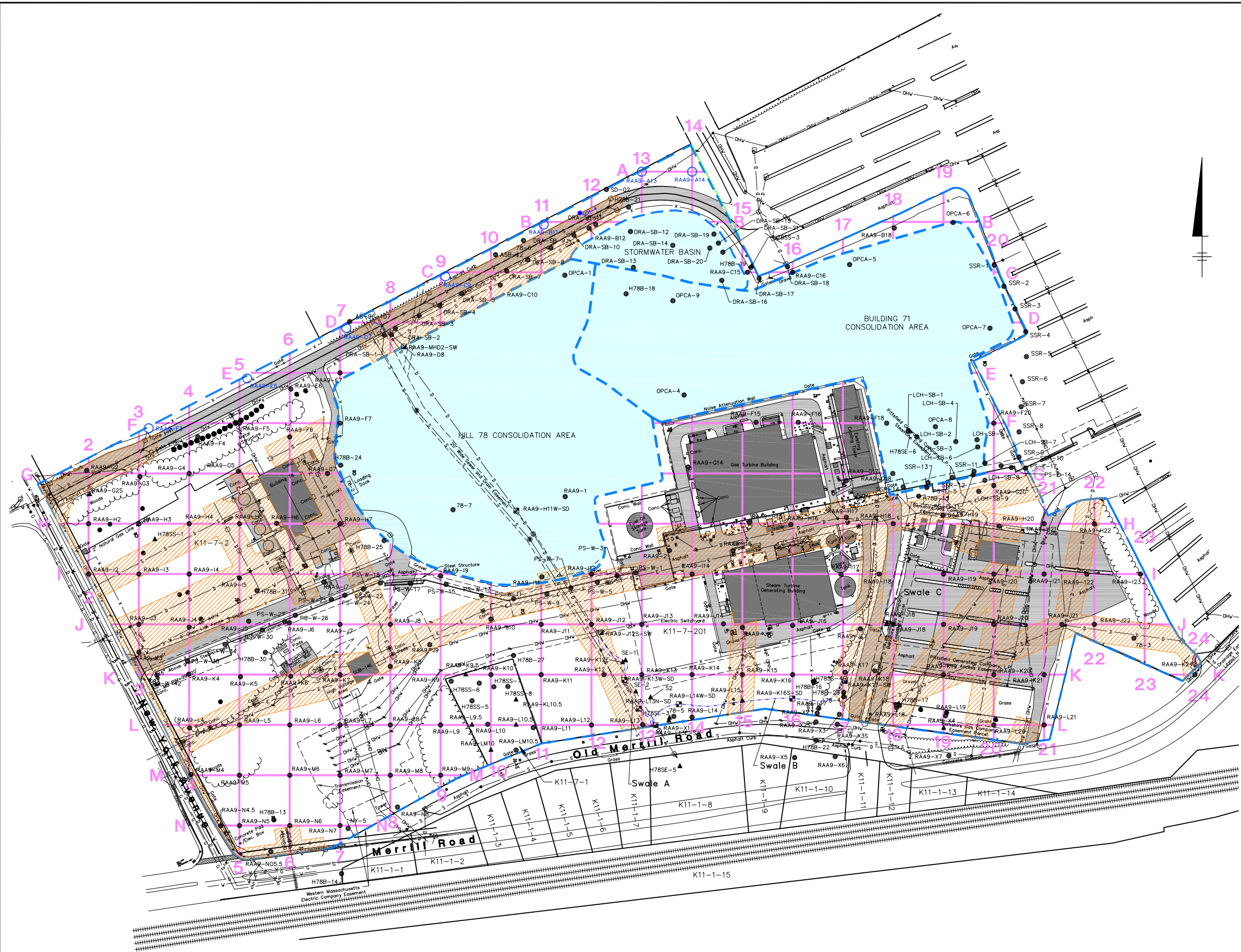
Table 1
Proposed Supplemental Soil Sampling Locations, Depths, And Parameters
Hill 78 Area-Remainder
General Electric Company - Pittsfield, Massachusetts

Sample ID	Sample Depth (ft.)	Analyses To Be Performed				
		PCBs	VOCs	SVOCs	Inorganics	PCDDs/PCDFs
UNPAVED AREAS ON GE PROPERTIES NORTH OF TYLER STREET EXTENSION						
RAA9-A13	0-1	X	--	--	--	--
	1-6	X	X	X	X	X
	6-15	X	--	--	--	--
RAA9-A14	0-1	X	X	X	X	X
	1-6	X	--	--	--	--
	6-15	X	--	--	--	--
RAA9-B11	0-1	X	X	X	X	X
	1-6	X	--	--	--	--
	6-15	X	--	--	--	--
RAA9-C9	0-1	X	--	--	--	--
	1-6	X	--	--	--	--
	6-15	X	X	X	X	X
RAA9-D7	0-1	X	X	X	X	X
	1-6	X	--	--	--	--
	6-15	X	--	--	--	--
RAA9-E5	0-1	X	--	--	--	--
	1-6	X	X	X	X	X
	6-15	X	--	--	--	--
RAA9-F3	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 supplemental pre-design investigations 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.

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 PROJECTNAME: IMAGES: 20464X01



- 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
 - EXISTING SURFACE WATER SAMPLE LOCATION (PCB & APPENDIX IX+3)
 - EXISTING SEDIMENT SAMPLE LOCATION (PCB & APPENDIX IX+3)
 - RAA9-X5 ○ PROPOSED SUPPLEMENTAL SAMPLING LOCATION

- NOTES:**
1. MAPPING BASED ON ELECTRONIC FILE (S2149W01.DWG) OF SURVEY BY FORESIGHT LAND SERVICES, DATED 3/16/06. UTILITY LOCATIONS BASED ON AVAILABLE RECORDED DATA AND VISIBLE FIELD EVIDENCE AND ARE NOT REPRESENTED AS BEING EXACT OR COMPLETE.
 2. SAMPLES FROM LOCATIONS RAA9-X5 AND RAA9-X6 ARE PROPOSED TO BE HELD PENDING ANALYTICAL RESULTS OF SAMPLES RAA9-X2S AND RAA9-X3S.

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

