



01-0509

Corporate Environmental Programs  
General Electric Company  
100 Woodlawn Avenue, Pittsfield, MA 01201

SDMS 37568

*Transmitted Via Overnight Delivery*

August 8, 2002

Mr. Bryan Olson  
EPA Project Coordinator  
U.S. Environmental Protection Agency  
EPA New England  
One Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
Unkamet Brook Area (GEC170)  
Proposed Soil Investigations to Support Facility Upgrade Project**

Dear Mr. Olson:

This letter describes the investigations proposed by the General Electric Company (GE) to characterize soils in certain portions of the Unkamet Brook Area Removal Action Area (RAA) at GE's Pittsfield, Massachusetts facility. The proposed investigations have been identified in response to plans developed by GE Plastics to renovate three existing access areas (as shown on Figure 1). This project will involve the construction of a new security building and access gates, construction of new pavement areas, restoration of existing paved areas, and miscellaneous other roadway and traffic pattern upgrades. As part of these activities, which are scheduled to begin in early September, it is estimated that approximately 1,500 to 2,000 cubic yards of soil will be excavated and transported off-site for disposal.

Since this work will be performed within areas covered by the October 27, 2000 Consent Decree entered into by GE, the U.S. Environmental Protection Agency (EPA), the Massachusetts Department of Environmental Protection (MDEP) and several other entities, the planned facility upgrades have been reviewed with respect to the pre-design soil investigation requirements established in the CD and accompanying *Statement of Work for Removal Actions Outside the River* (SOW). From this review, GE has identified a pre-excavation sampling program that will support certain aspects of the upgrade project (i.e., the characterization of soils subject to disposal) and also generate soil data that will satisfy some pre-design investigation requirements established in the CD and SOW. A summary of the proposed sampling program is presented below.

### **Soil Sampling Objectives**

In accordance with the CD and SOW, GE is required to perform pre-design soil investigations for the Unkamet Brook Area to support future Removal Design/Removal Action (RD/RA) evaluations for this area. The Pre-Design Investigation Work Plan identifying the proposed scope of such activities at this

RAA is not scheduled to be submitted to EPA until November 27, 2002. However, in light of the scope (and schedule) of the facility upgrades summarized above, GE has determined that pre-design soil sampling in these areas would be beneficial at this time.

There are two primary objectives of the sampling activities proposed in this letter. First, since this RAA will be subject to future pre-design soil investigations, one or more of the areas included in facility upgrades may be subject to future pre-design sampling. As a result, GE prefers to sample these areas prior to the initiation and completion of construction activities to avoid future disturbances to this area. Second, the upgrade project will involve the removal and likely off-site disposal of existing soils from the RAA. Therefore, the sampling plan outlined in this letter will be used to support waste characterization/disposition activities. These objectives serve as the overall data quality objectives for the proposed investigations.

### **Proposed Soil Investigations**

The three areas subject to upgrades are either currently paved or will be paved following completion of the project. Therefore, the proposed sampling program considered the pre-design sampling requirements established in the CD and SOW for paved areas within the GE Plant Area (including the Unkamet Brook Area). The applicable requirements call for the advancement of soil borings at an approximate frequency of two soil borings per acre of paved area, with sample collection at the following depth increments: 0 to 1 foot, 1 to 6 feet, and 6 to 15 feet. As shown on Figure 1, the total area associated with the planned upgrades is less than one acre. However, GE has elected to advance at least one boring in each of the areas (five borings total) to satisfy pre-design requirements and to provide area-specific information to support future waste characterization/disposition activities.

Figure 1 identifies the proposed sampling locations, while Table 1 summarizes the scope of sampling and analysis activities. In total, 15 soil samples from five soil boring locations will be collected and analyzed for PCBs. In addition, a total of five samples will be analyzed for the constituents listed in Appendix IX of 40 CFR 264, plus 2-chloroethyl vinyl ether, benzidine, and 1,2-diphenylhydrazine (Appendix IX+3), excluding herbicides and pesticides (discussed below). Additional notes regarding the proposed sampling and analysis activities are provided below:

- For the purposes of this sampling activity, and to expedite GE's preparation and EPA review/approval of this proposal, GE has not considered the potential availability and usability of any existing soil data at or near the areas subject to the facility upgrades. Any such data will be obtained and assessed as part of waste characterization activities (related to this project) and/or as part of the future preparation of the Pre-Design Investigation Work Plan for this RAA.
- The scope of Appendix IX+3 sampling has been developed consistent with the requirements established in the CD and SOW. Specifically, the number of Appendix IX+3 samples (five total) is one-third the total number of required PCB samples, with three of the Appendix IX+3 samples collected from the top foot of the RAA. The remaining two Appendix IX+3 samples are distributed between the subsurface soil sample depth increments.
- The samples identified for analysis using the Toxicity Characteristic Leaching Procedure (TCLP) have been selected based on a current understanding of the upgrade project and specifically the locations/depths of soil that may be subject to removal and off-site disposal. A total of three samples (one from each area) have been selected for TCLP analysis.

- For samples collected for Appendix IX+3 analysis as part of this investigation, GE proposes to exclude analysis for pesticides and herbicides for the following reasons: (1) in prior pre-design sampling and analysis activities performed at the GE Plant Area, pesticides and herbicides were not included; and (2) the presence of these compounds, if detected, would likely be attributable to the application of weed and pest control materials in accordance with their intended and appropriate commercial application.

The collection and analysis of the soil samples will be conducted following the procedures set forth in GE's approved *Field Sampling Plan/Quality Assurance Project Plan* (FSP/QAPP). Specifically, the analytical procedures for the analysis of soil samples will be consistent with the procedures presented in Table 1 of the FSP/QAPP. The field procedures will follow the Standard Operating Procedures (SOPs) presented in Appendices B through X of the FSP/QAPP.

Soil samples collected during this investigation will utilize EPA Method 8082 for the analysis of Aroclor-specific PCBs. Results for PCBs will be reported on a dry-weight basis with a detection limit of 0.05 ppm for all Aroclors. Soil samples for other Appendix IX+3 constituents (excluding pesticides and herbicides) will be analyzed following the methods presented in Table 1 of the FSP/QAPP. Sample results will be presented on a dry-weight basis with detection limits consistent with those presented in Table 3 of the FSP/QAPP.

As at other RAAs within the GE Plant Area, analysis of samples for polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) will be performed using EPA Method 8290 for samples collected from the top foot of soil and Method 8280A for the other samples. PCDD/PCDF results will be reported on a dry-weight basis for both total homologues and 2,3,7,8-substituted congeners, using sample detection limits consistent with those presented in Table 3 of the FSP/QAPP. In addition, total TEQ concentrations will be calculated for the PCDD/PCDF compounds using the Toxicity Equivalency Factors (TEFs) derived by the World Health Organization (WHO) and representing non-detected compounds as one-half the analytical detection limit.

Quality control samples (i.e., matrix spike/matrix spike duplicates, field duplicates, trip blanks, and field blanks) will be collected at the frequency specified in Table 4 of the FSP/QAPP for each sample matrix collected. Tables 4 and 5 of the FSP/QAPP present the quality control criteria and corrective action procedures to be followed for each of the analytical procedures listed in Table 1 and for field-generated quality control samples. Overall project quality assurance will be ensured by following the procedures specified in the FSP/QAPP for sample collection and analysis, corrective action, and data reporting and validation.

#### **Anticipated Schedule and Follow-up Activities**

Following EPA approval, GE will initiate the sampling program described herein, with the goal of completing the program in early September 2002 (this timing is based on the anticipated construction schedule identified by GE Plastics). Once the soil sampling results are available, GE will review those results to confirm the anticipated disposition of excavated site materials (i.e., off-site disposal), or alternatively, to assess possible on-site re-use of the excavated materials. In the event that GE determines to further consider the potential for on-site re-use some or all of the materials, GE will submit a proposal to EPA detailing this course of action and including a plan for additional soil sampling sufficient to support such re-use under the standards outlined in GE's *Excavation Protocols for the Management of Excavation Activities*.

In addition, GE will provide all the results of this sampling program (and any other related sampling) to the EPA and MDEP as part of its monthly status reports on CD activities. These sampling results will also be included in the upcoming Pre-Design Investigation Work Plan for the Unkamet Brook Area, to be submitted in November 2002.

Please call me if you have any questions regarding this proposal.

Sincerely,



John F. Novotny, P.E.  
Manager-Facilities & Brownfields Programs

Enclosure

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Public Information Repositories  
GE Internal Repository

TABLE 1

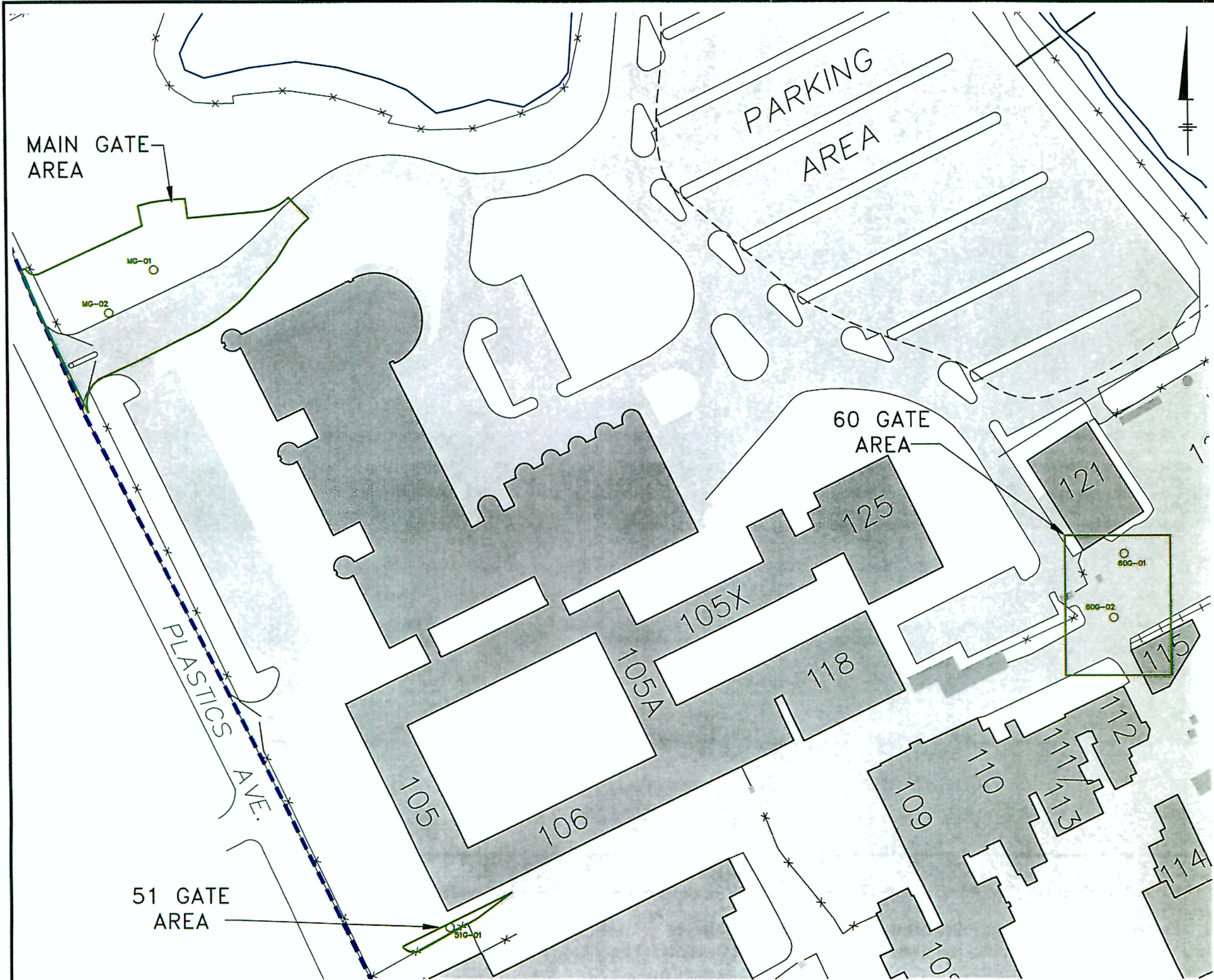
## GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

PROPOSED SOIL INVESTIGATION FOR  
GE PLASTICS FACILITY UPGRADE PROJECTPROPOSED SOIL SAMPLING LOCATIONS, DEPTHS, AND PARAMETERS

SAMPLE ID	SAMPLE DEPTH	ANALYSES					
		PCBs	VOCs	SVOCs	INORGANICS	PCDDs/PCDFs	TCLP (Note 2)
MG-01	0-1 ft	X	X	X	X	X	--
	1-6 ft	X	--	--	--	--	X
	6-15 ft	X	--	--	--	--	--
MG-02	0-1 ft	X	--	--	--	--	--
	1-6 ft	X	X	X	X	X	--
	6-15 ft	X	--	--	--	--	--
51G-01	0-1 ft	X	X	X	X	X	X
	1-6 ft	X	--	--	--	--	--
	6-15 ft	X	--	--	--	--	--
60G-01	0-1 ft	X	--	--	--	--	X
	1-6 ft	X	--	--	--	--	--
	6-15 ft	X	X	X	X	X	--
60G-02	0-1 ft	X	X	X	X	X	--
	1-6 ft	X	--	--	--	--	--
	6-15 ft	X	--	--	--	--	--

**NOTES:**

1. The specific locations/depths of the non-PCB Appendix IX+3 samples may be modified in the field considering PID readings or other observations (e.g., odors or evidence of staining).
2. TCLP = Toxicity Characteristic Leaching Procedure

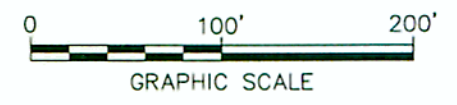


**LEGEND:**

- ✕—✕ FENCE
- APPROXIMATE EDGE OF WATER
- +— RAILROAD TRACK
- WATER
- BUILDING
- CURRENTLY PAVED AREA
- MG-02 PROPOSED SOIL BORING LOCATION
- GENERAL AREA SUBJECT TO FACILITY UPGRADE ACTIVITIES

**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 ON OBSERVATIONS DURING A SITE VISIT BY BBL PERSONAL ON DECEMBER 3, 1997.
2. BOUNDARIES ARE APPROXIMATE.
3. NOT ALL PHYSICAL FEATURES SHOWN.
4. EXTENT OF PAVED/UNPAVED AREAS IS APPROXIMATE.



GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS

**GE PLASTICS SECURITY GATE RENOVATIONS**

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**SUMMARY OF SOIL SAMPLING LOCATIONS**

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**BBL** BLASLAND, BOUCK & LEE, INC.  
engineers & scientists

FIGURE  
**1**

X: 40190X01,40190X02  
 LMAN: AREA-RAA  
 P: PAGESET/PLT-BL  
 8/8/02 SYR-54-DMW LAS NES  
 N/40190001/UPGRADE/40190B01.DWG