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March 10, 2003

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

Via Electronic and U.S. Mail

Re: Comments on General Electric's November 2002 *Pre-Design Investigation Work Plan for Unkamet Brook Removal Action*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the pre-design investigation activities described in the above-referenced "*Pre-Design Investigation Work Plan for Unkamet Brook Removal Action*" (PDIWP). The PDIWP 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 conditions presented in this letter. The General Electric Company (GE) shall address these conditions in a revised PDIWP, to be submitted to EPA within 60 days from the date of this letter. Following EPA review and approval of the revised PDIWP, GE shall commence the pre-design activities on the schedule proposed by GE in that revised PDIWP and approved by EPA.

General Conditions

1. In the PDIWP, GE proposed to exclude Parcel L11-4-112 from the Unkamet Brook Area RAA because it contains several railway tracks and related appurtenances. EPA does not concur with this proposal. In the revised PDIWP, GE shall include Parcel L11-4-112 in the pre-design investigations, but may omit sampling in the ballast of active rail lines.
2. In the revised PDIWP, GE shall propose a process for assessing sediments in the Decorative Pond that includes, at a minimum, the following components:
  - An inspection of the flow-control structures located between the pond and Unkamet Brook to assess the presence of accumulated sediments within the structures;
  - Sampling of accumulated sediments (if present) in the flow-control structures for PCBs;

- Reporting of the PCB results in the Interim Pre-Design Investigation Report (Interim PDI Report) discussed in Condition 19 below;
  - If no accumulated sediments are observed in the flow-control structures, GE shall measure the sediment thickness at the bottom of the pond and report such measurements in the Interim PDI Report; and,
  - If PCBs are detected in the sediments in the flow-control structures or if no accumulated sediments are observed in the flow-control structures, an evaluation of the need for and scope of sampling of surficial sediments within the Decorative Pond for PCBs and, if appropriate, a proposal and schedule for such sampling shall be included in the Interim PDI Report.
3. In Subsection 4.2.1 of the PDIWP, GE proposes to perform sampling in the portion of the non-industrial area of GE-owned Parcel K12-9-1 that is located more than 100 feet from Unkamet Brook (excluding the inundated wetlands) in an iterative fashion. GE proposes to initially sample such portion on a larger grid than is required in the Statement of Work for Removal Actions Outside the River (SOW) and then evaluate the need for additional sampling. EPA accepts this proposed approach subject to the following conditions:
- a. GE shall collect 22 additional surface soil samples (0 to 1 foot) for PCB analysis at the following grid nodes: RAA10-N-F23, N-H21, N-H23, N-J13, N-J15, N-J17, N-J19, N-J21, N-J23, N-L21, N-N23, N-N25, N-P23, N-P25, N-P27, N-R23, N-R25, N-R27, N-T25, N-V23, N-V25, and N-X25.
  - b. GE shall convert the proposed surface soil samples at grid nodes RAA10-N-E26, N-M26, and N-CC26 to soil borings and collect samples for PCB analysis at the 0- to 1-foot, 1- to 3-foot, 3- to 6-foot, and 6- to 15-foot depth increments. GE shall also advance a soil boring at location N-I26 with similar soil sample increments.
  - c. An additional five (5) soil borings and additional 15 surface soil samples shall be added on the parcel for further PCB and Appendix IX+3 constituent characterization (as discussed in comment 4 below), to be located as directed by EPA based on the results of an EPA and MDEP walk-over of the parcels once the snow has melted.
  - d. Following receipt of the initial pre-design PCB sampling results for this parcel, GE shall evaluate whether additional PCB sampling at this parcel (excluding the inundated wetlands and portions of Unkamet Brook and the former interior landfill that are located within the parcel) is needed to assess achievement of the applicable PCB Performance Standards. GE shall submit the results of this evaluation and, if necessary, a proposal for additional sampling at this parcel to EPA for review and approval. In the event that GE determines that no additional sampling is necessary or that any additional sampling would amount to less overall sampling in this area than would otherwise be required by the SOW, and EPA approves that determination, GE and EPA shall file a non-material modification to the SOW with the federal District Court, pursuant Paragraph 216 of the Consent Decree, after providing MDEP with a reasonable opportunity to review and comment.

4. Corresponding to the proposed reduction in PCB sampling under the above approach for non-industrial areas of Parcel K12-9-1, GE has proposed to reduce the number of Appendix IX+3 samples, maintaining the ratio of 1/3 the number of PCB samples proposed for collection in the PDIWP. GE has also proposed to modify the number of soil samples to be analyzed for polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (PCDDs/PCDFs) in this area. EPA accepts GE's proposed initial reduction in the number of Appendix IX+3 and PCDD/PCDF sampling locations subject to the following conditions:
  - a. In the revised PDIWP, GE shall propose, for EPA review and approval, the specific Appendix IX+3 and PCDD/PCDF sampling locations.
  - b. The number of samples to be collected from the non-industrial portion of Parcel K12-9-1 for PCDD/PCDF analyses shall at least be approximately one-third of the number of samples proposed in the revised PDIWP for other Appendix IX+3 analyses.
  - c. Following receipt of the initial pre-design Appendix IX+3 and PCDD/PCDF sampling results for this parcel, GE shall evaluate whether additional Appendix IX+3 and PCDD/PCDF sampling at this parcel (excluding the inundated wetlands and portions of Unkamet Brook and the former interior landfill that are located within the parcel) is needed to assess achievement of the applicable Performance Standards. GE shall submit the results of this evaluation and, if necessary, a proposal for additional sampling at this parcel to EPA for review and approval. In the event that GE determines that no additional sampling is necessary or that any additional sampling would amount to less overall sampling in this area than would otherwise be required by the SOW, and EPA approves that determination, GE and EPA shall file a non-material modification to the SOW with the federal District Court, pursuant Paragraph 216 of the Consent Decree, after providing MDEP with a reasonable opportunity to review and comment.
5. EPA does not accept the iterative PCB and Appendix IX+3 sampling approach proposed in the PDIWP for the non-GE owned, non-industrial parcels in the East Area of the Unkamet Brook RAA (Parcels L11-4-11 and L12-2-1). In the revised PDIWP, GE shall propose PCB and Appendix IX+3 sampling on these parcels consistent with the pre-design investigation requirements of the SOW, except that for PCDDs and PCDFs only, GE may propose a reduced scope of sampling, with a minimum of approximately one-half the number of samples collected for other Appendix IX+3 analyses.
6. In preparing the Conceptual RD/RA Work Plan or in making any determination that any portion of Unkamet Brook will require remediation, GE shall evaluate each averaging area within Unkamet Brook (i.e., Areas 9J, 9K, and 9L), as a whole, to evaluate the extent of remedial actions needed to achieve the specified Performance Standards. A conclusion that remediation is required (e.g., sediment removal) in a particular location shall be based on the evaluation of an entire averaging area. A proposal to remove only a portion of an averaging area must be supported by evaluations showing that the averaging area would no longer exceed the Performance Standards following execution of the proposed removal.
7. GE has characterized the location of Unkamet Brook as corresponding to the approximate edge of water (see PDIWP Figures 4 and 5). In the revised PDIWP, GE shall (1) define the boundary of Unkamet Brook as the mean annual high water line; (2) revise Tables 1, 2 and 3,

correcting designations of existing and proposed data points, as needed, distinguishing Unkamet Brook sediments from floodplain soils outside of Unkamet Brook; (3) revise figures as needed; and (4) propose alternative samples (new or existing), as needed, to characterize Unkamet Brook sediments (within the mean annual high water line boundary).

8. For Unkamet Brook averaging areas 9J, 9K and 9L, if the PCB results from the limited sediment sampling proposed in the PDIWP suggest that remediation activities may not be necessary for portions of the Brook sediments to meet the Performance Standards in the CD and SOW, GE must then demonstrate that those portions have been adequately characterized in accordance with the pre-design requirements established in the SOW. In the Interim PDI Report (discussed in Condition 19 below), GE shall present the pre-design PCB sampling results for the Brook sediments, assess these and the historical PCB data in terms of potential data needs, and present a preliminary assessment regarding the need for remedial actions. Based on these activities, for those portions of the Brook sediments that may not require remediation, GE shall propose additional pre-design PCB sampling for EPA review and approval, as necessary to meet the pre-design requirements established in the SOW.
9. Similar to Condition 8 above, if the PCB results from the soil sampling proposed in the PDIWP for the inundated wetland areas suggest that remediation activities may not be necessary for portions of those areas to meet the Performance Standards in the CD and SOW, GE must then demonstrate that those portions have been adequately characterized in accordance with the pre-design requirements established for these areas in the SOW. In the Interim PDI Report (discussed in Condition 19 below), GE shall present the pre-design PCB sampling results for the inundated wetlands, assess these and the historical PCB data in terms of potential data needs, and present a preliminary assessment regarding the need for remedial actions. Based on these activities, for those portions of the inundated wetland areas that may not require remediation, GE shall propose additional pre-design PCB sampling for EPA review and approval, as necessary to meet the pre-design requirements established in the SOW.
10. In addition to Conditions 8 and 9 above, for those portions of Unkamet Brook and/or the inundated wetland areas where remediation may not be necessary (and thus additional PCB sampling will be performed), GE shall include, in the Interim PDI Report, a proposal to address Appendix IX+3 constituents in the upper foot of sediments and/or soils in those portions.
11. In the revised PDIWP, GE shall identify on the report figures the approximate location of the two branches of the unnamed brook, which are depicted in aerial photos as flowing from the OP-3 area toward the Housatonic River and are located north of Unkamet Brook. Further, after establishing the PCB grid-based soil sampling pattern for this area GE shall relocate or add samples so that a minimum of eight (8) samples are located within the two unnamed brooks. The linear spacing of these eight (8) samples shall be approximately every 150 feet along the waterways.
12. For subsurface utilities potentially subject to emergency repair, the revised PDIWP shall propose a revised characterization approach consistent with the following:
  - A. For GE-owned commercial/industrial parcels, GE may propose an iterative approach. Initially, GE shall conduct PCB pre-design soil sampling at a minimum at the locations proposed in the PDIWP. If any discrete PCB

results from this pre-design sampling exceed 200 ppm in the top six (6) feet, GE shall, in the Interim PDI Report, identify any active subsurface utilities in the area(s) where such concentrations were found, and shall evaluate the need for and scope of additional PCB sampling for the soils in those active utility corridors, taking into account other nearby data as appropriate. If such additional sampling should be necessary, it should be consistent with the approach described below.

- B. For other areas of the RAA (and those portions of the above areas where additional utility-related characterization sampling is necessary), GE shall assess existing subsurface utilities consistent with the approach used at other RAAs at this Site. Specifically, PCB soil data (either existing or proposed) should be available within a 50-foot band centered along the utility at a linear spacing of 100 to 150 feet along the utility, and the minimum depth of the PCB soil data should be six (6) feet (for utilities located within the GE Plant) or the depth of the utility trench bedding (for non-GE-owned areas).
13. For the non-industrial portions of GE-owned Parcel K12-9-1 and non-GE-owned, non-industrial Parcels L11-4-11 and L12-2-1, GE shall sample for herbicides and pesticides at the same locations and depths proposed for PCDD/PCDF sampling.
  14. GE has not proposed any specific pre-design soil or sediment investigation activities to support capping the Former Interior Landfill and re-routing that section of Unkamet Brook, and "has not identified any need at this time for additional pre-design characterization activities beyond those presented in this PDI Work Plan." Because the re-routed Unkamet Brook bank "will abut the Former Interior Landfill," EPA reserves the right to require additional sampling to assure that the extent of the landfill cap is adequate, and that soils and sediments beyond the cap (including the area of the re-routed brook) are adequately characterized.
  15. In Subsection 4.2.2 of the PDIWP, GE shall change the second sentence of the first paragraph to read "...would not be necessary if for any such portion where GE determines, ...will be required ~~for all or a portion of the brook or wetlands~~ in any event."
  16. GE shall provide limits of detection for all existing analytical results included in Appendix A that are proposed for characterization or supplemental data usage. If GE is unable to provide detection limits for any such analytical results, such results shall not be used in any pre-design characterization in the Unkamet Brook RAA.
  17. GE shall modify Footnote 11 to Table 1 regarding samples located beneath existing building slabs, to clarify that such data have not been used to satisfy pre-design sampling requirements. With respect to future site conditions, EPA notes that soils beneath an existing building will be subject to future RD/RA evaluations (and possible response actions) should the building be removed, subject to the conditions as defined in the CD and/or applicable EREs.
  18. In Subsection 4.2.1 of the PDIWP, GE proposes surficial and subsurface PCB sampling locations in Figures 3, 4, and 5 to provide pre-design soil characterization data. GE shall amend and/or modify the proposed PCB sampling as follows:

- a. Figure 3/West Area:
  - i. GE shall provide a map in the revised PDIWP showing which median strips in the General Dynamics parking lot are unpaved, if any. If any of these median strips are to remain unpaved, GE shall propose additional surface soil sampling to characterize those locations in the revised PDIWP.
  - ii. Convert the surficial sample at grid location RAA10-W-O16 to a subsurface sample location, to characterize Parcel K11-7-9 with two, rather than one, subsurface locations.
  - iii. Review and adjust the following subsurface sample locations in paved areas as needed to characterize soils in the vicinity of following locations: RAA10-W-H15, approximately 40 feet to the southeast of the grid node; RAA10-W-K17, approximately 50 feet southeast of the grid node; and RAA10-W-L19, approximately 50 feet southwest of the grid node.
  
- b. Figure 4/North Area:
  - i. Add three subsurface PCB sample locations to represent grid nodes RAA10-N-CC10, RAA10-N-CC12, and RAA10-N-EE10. At these locations, the sample grid node falls within an existing building but is less than 15 feet from the exterior edge of the building. For each grid node, a sample location outside of the building and in an unpaved area shall be proposed in the revised PDIWP.
  - ii. Relocate the sample proposed at grid node RAA10-N-JJ10 approximately 50 feet to the west.
  
- c. Figure 5/East Area:
  - i. Add surficial sample location RAA10-E-U23 to Parcel L12-2-2.
  
19. GE shall submit an Interim PDI Report to address certain areas of this RAA where additional investigations may be needed based on the outcome of initial activities. At a minimum, that report shall address the following areas: a) Decorative Pond, b) Unkamet Brook sediments, c) inundated wetlands, and d) need for additional utility-related sampling in the GE-owned commercial/industrial parcels. For such areas, the Interim PDI Report shall summarize the findings of the activities conducted and present GE's assessment and proposals related to such findings. The Interim PDI Report shall be submitted to EPA for review and approval within 6 months of the approval of the revised PDIWP. GE shall submit the final PDI Report for EPA review and approval within 12 months of the date EPA approves the Interim PDI Report.

**Errata**

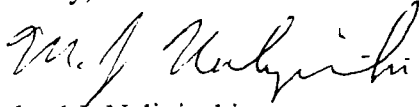
The summary table on Figure 4 reports the PCB concentration in sample UFP2-L4, 0-1 ft bgs, as 0.25 [0.23] ppm; however, Table 7-2 of the *MCP Interim Phase II Report and Current Assessment Summary for Unkamet Brook Area/USEPA Area 1*, Page 3 of 10, reports the concentration as 46 ppm. This result appears to have been transposed with the result for

sample UFP-R4.

EPA reserves its right to perform additional sampling in the areas subject to PDIWP and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (617) 918-1268.

Sincerely,



Michael J. Nalipinski  
GE Facility Project Manager

cc:	John Novotny,	GE
	James Bieke,	Shea & Gardner
	Jim Nuss,	BBL
	Sue Keydel,	MDEP
	Sue Steenstrup,	MDEP
	Robert Bell,	MDEP
	Alan Weinberg,	MDEP
	Bryan Olson,	US EPA
	Holly Inglis,	US EPA ✓
	John Kilborn,	US EPA
	K.C. Mitkevicius,	USACE
	Judy Morris,	Weston Solutions
	Pittsfield MA Office,	US EPA
	Mayor Sara Hathaway,	City of Pittsfield
	Property Owner	Parcel K11-7-8
	Property Owner	Parcel L11-4-11
	Property Owner	Parcel L11-4-213
	Property Owner	Parcel L12-1-2
	Property Owner	Parcel L12-1-3
	Property Owner	Parcel L12-1-4
	Property Owner	Parcel L12-1-5
	Scott LeBeau,	General Dynamics
	Mass. Dept. of Highways,	Rights of Way Bureau
	Mass. Board of Regional Community Colleges	
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	Site File	