

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

Transmitted Via Facsimile and FedEx

November 24, 1998

Mr. Alan Weinberg Bureau of Waste Site Cleanup Department of Environmental Protection 436 Dwight Street Springfield, MA 01103 Mr. Dean Tagliaferro
Mr. Bryan Olson
Office Site Remediation and Restoration
U.S. Environmental Protection Agency
One Congress Street
Boston, MA 02203-2211

Re:

Newell Street Area II (DEP #1-1057; USEPA Area 5B)

Proposal for DNAPL Recovery Operations

Dear Mr. Weinberg, Mr. Olson and Mr. Tagliaferro:

Enclosed please find the General Electric Company's (GE's) proposal for dense nonaqueous phase liquid (DNAPL) recovery operations at the Newell Street Area II/USEPA Area 5B Site (the Site). This proposal presents the results of the DNAPL recovery field tests, conducted in monitoring wells NS-15, NS-30, and NS-32 and proposes a design for an automated DNAPL pumping system at the Site.

Upon approval of the proposed DNAPL recovery system, GE will start procurement of all necessary equipment and will file a Notice of Intent with the Pittsfield Conservation Commission (PCC).

Please call if you have any questions or comments.

John D. Ciampa/dom

Sincerely,

John D. Ciampa

Remedial Project Manager

Q:\DMN98\A9581550.WPD

JJL/dmn

Enclosures

Mr. Alan Weinberg Mr. Dean Tagliaferro Mr. Bryan Olson November 24, 1998 Page 2 of 2

cc: J. Cutler, DEP*
D. Luckerman, Esq., EPA
State Representative C.
Hodgkins
State Representative P. Larkin
Housatonic River Initiative
G. Bibler, Esq., Goodwin,
Procter & Hoar*
R. Bell, DEP*
Pittsfield Conservation
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State Representative D. Bosley
State Senator A. Nuciforo
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J. Bieke, Esq., Shea & Gardner*
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Commissioner of Health, Pittsfield*
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^{*} enclosures

GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS

PROPOSAL FOR DNAPL RECOVERY OPERATIONS AT THE NEWELL STREET AREA II/USEPA AREA 5B SITE

I. INTRODUCTION

On September 11, 1998, GE submitted a Source Control Work Plan - Upper Reach of the Housatonic River (First ½ Mile) to the United States Environmental Protection Agency (USEPA) and the Massachusetts Department of Environmental Protection (MDEP; collectively, the Agencies). The Source Control Work Plan included a proposal for the implementation of a dense NAPL (DNAPL) recovery field testing program at the Newell Street Area II/USEPA Area 5B Site (the Site). The proposed program included provisions for evaluating the field data and the submission of a proposal for the installation of an active DNAPL pumping system at the Site.

In accordance with the provisions of the Source Control Work Plan, GE implemented the DNAPL recovery field testing program between September 22 and September 30, 1998. This document, which has been prepared by Blasland, Bouck & Lee, Inc. (BBL) on behalf of GE, presents the results of the DNAPL recovery field test and proposes a design for an automated DNAPL pumping system at the Site. The results of the DNAPL recovery field test and the design of the proposed NAPL recovery system for the Site are presented in Sections II and III, respectively. The tentative implementation schedule is discussed in Section IV.

II. RESULTS OF THE DNAPL RECOVERY TESTING PROGRAM

GE conducted a series of one-day DNAPL recovery tests in monitoring wells NS-15, NS-30, and NS-32 between September 22 and September 30, 1998. Each individual one-day test was conducted over an approximate 6- to 7-hour duration using an interface probe and a submersible, pneumatic DNAPL recovery pump. During each test, the DNAPL thickness and the volume of DNAPL removed were recorded at regular intervals. The DNAPL recovery data are summarized in Table 1. Plots of incremental DNAPL recovery volumes as a function of time for each monitoring well are presented in Figures 2 through 4. The DNAPL recovery results are discussed below.

- Monitoring Well NS-15: Daily DNAPL recovery tests were conducted on September 24, 25, and 28, 1998. The one-day tests ranged from 5.6 to 6.9 hours in duration. Total DNAPL recoveries for each day were 4.68, 3.48, and 4.83 gallons, respectively (see Table 1). During each test, incremental DNAPL removal volumes initially decreased through time and then stabilized (see Figure 2). The DNAPL volume present in NS-15 was observed to recover substantially between the conclusion of the September 24 test and the commencement of the September 25 test (67% of September 24 initial volume), and between the conclusion of the September 25 test and the September 28 test (85% of the September 24 initial volume).
- Monitoring Well NS-30: Two one-day tests were conducted on September 29 and September 30, 1998. The tests ranged from 4.3 to 6.6 hours in length, during which total DNAPL recoveries were 2.70 and 3.26 gallons, respectively (see Table 1). As anticipated, incremental DNAPL removal volumes initially decreased through time during each test, but stabilized at a higher level than that observed for well NS-15 (see Figure 3). Between the conclusion of the September 29 test and the beginning of the September 30 test, the initial volume present in well NS-30 on September 30 recovered to 69% of the initial volume present prior to the beginning of the September 29 test.

• Monitoring Well NS-32: Two one-day DNAPL removal tests were completed for monitoring well NS-32 on September 22 and September 23, 1998. Additionally, DNAPL was removed one time on the morning of September 24. The duration of the two tests were similar (6.6 and 6.4 hours respectively), and daily totals of 1.22 and 0.63 gallons of DNAPL were recovered during each test (see Table 1). Incremental DNAPL removal volumes decreased during the early stages of each test, and remained below 0.1 gallons for most of the two trials (see Figure 4). The overnight recovery rate of DNAPL in well NS-32 also was lower relative to wells NS-15 and NS-30.

In summary, the DNAPL recovery tests revealed that incremental recovery volumes decreased from the initial volume present in each well, but asymptotically approached a stable level through time. Over the 5-to 7-hour duration of the one-day tests, stable incremental recovery volumes of approximately 0.5 gallons per hour were observed for monitoring wells NS-15 and NS 30. In contrast, stable removal volumes for well NS-32 were less than 0.1 gallon per hour during the two one-day tests. These data provide an estimated recovery rate for wells NS-15, NS-30, and NS-32. Although the results of the short-term tests cannot be employed to predict long-term DNAPL removal volumes, the data from the recent DNAPL recovery tests indicate that an automated DNAPL recovery system appears feasible for monitoring wells NS-15, NS-30, and NS-32, although the recovery from NS-32 may be limited.

III. DESCRIPTION OF DNAPL COLLECTION SYSTEM

As discussed in Section II, GE intends to install an automated DNAPL recovery system for wells NS-15, NS-30, and NS-32. This section provides a general description of the proposed system. Figure 1 provides a site plan and Figures 5 through 7 provide additional details and system specifications.

A pneumatic DNAPL recovery pump will be installed in each of the three wells. The pumps will discharge via double wall containment piping to a 55-gallon drum located within a pre-manufactured storage building. Each of the piping runs will be insulated and heat traced to prevent freezing during winter operations. Additionally, the piping will be sloped to allow drainage back to the wells when the pumps are not in operation. The operation of the pumps will be controlled by a timer located adjacent to the well head that can be adjusted, as appropriate, to optimize DNAPL recovery. The pump air compressor and electrical controls will be located in a separate equipment storage building located adjacent to the DNAPL storage building. Additionally, all piping materials, pumps, floats, etc. that will be in contact with the DNAPL have been selected based on appropriate materials compatibility considerations.

The DNAPL and equipment storage buildings will be provided with heating and ventilation for year-round operation. The DNAPL storage building also includes a 122 gallon secondary containment sump (i.e., 220 percent of the drum volume). Level floats will be installed in the 55-gallon drum and the containment sump that will shut off the pumps in the event of a high level in the drum or a high level in the sump.

When the drum becomes full, GE will remove and appropriately dispose of the drum. Based on the results of the recovery testing program and the estimated stable yield of the three wells (1.1 gallons per hour), the drum will initially be replaced approximately once every two days. However, it should be pointed out that these initial results are from a short-term test and it is anticipated that the overall recovery volumes/rates will decrease as the system continues to operate.

In addition to the three wells mentioned above, two other wells (N2SC-1I and N2SC-2) installed as part of the Source Control investigations have initially indicated the presence of DNAPL at thicknesses of approximately 3 to 3.5 feet. GE will monitor these wells on a weekly basis and remove DNAPL if a thickness of greater than 0.5 feet is measured. If the thickness of DNAPL is consistently greater than 1 foot over a 4 to 6 week period, GE will evaluate the need to include these wells in the automated DNAPL recovery system. Furthermore, additional wells may be included in the automated DNAPL recovery system pending evaluation of the results of the Source Control investigations.

IV. ANTICIPATED SCHEDULE

The proposed schedule for the construction and implementation of the Newell Street Area II automated DNAPL recovery system is illustrated on Figure 8. GE has already purchased the DNAPL recovery pumps. Upon receipt of Agency approval of the proposed DNAPL recovery system design, GE will prepare and submit a Notice of Intent (NOI) to the Pittsfield Conservation Commission (PCC). During PCC review, GE proposes to install the DNAPL recovery pumps, operate the pumps manually on a daily basis, and purchase the enclosures and remaining equipment. During this enhanced manual recovery phase, it is anticipated that DNAPL will be pumped from each well at least once per day, placed in approved containers, and removed from the Site. The enhanced manual recovery effort will continue until GE receives the necessary Order of Conditions from the PCC, and the automated system is constructed and operational. The remaining installation activities will be initiated within 10 days following the PCC's issuance of an Order of Conditions covering this work, unless the Order is appealed. This schedule may be subject to modification, if necessary, to accommodate possible constraints associated with PCC review, inclement weather, and obtaining access permission from the Western Massachusetts Electric Company (for Well NS-30).

BLASLAND, BOUCK & LEE, INC.
engineers & scientists

Tables

TABLE 1

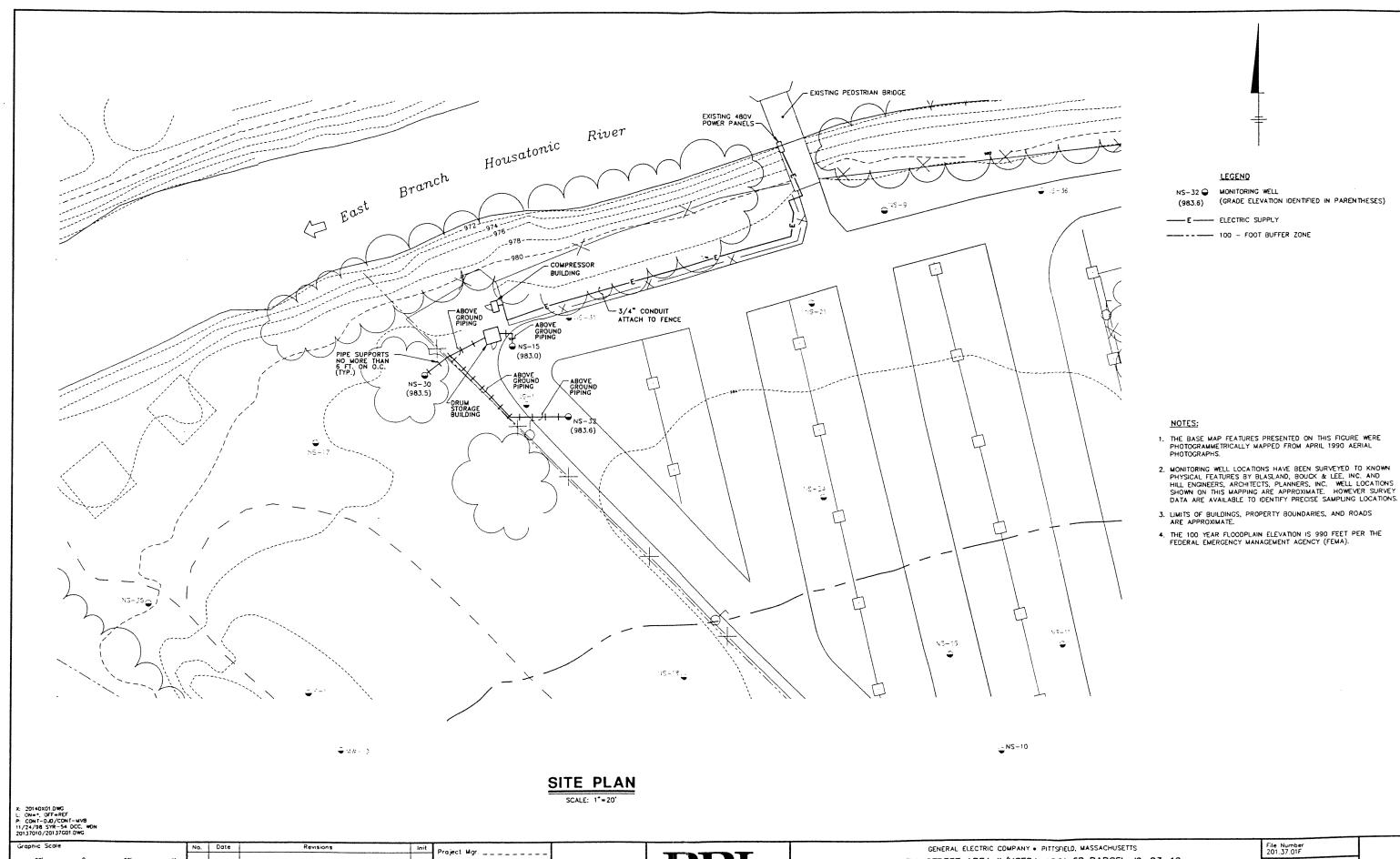
GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS NEWELL STREET AREA II/USEPA AREA 5B

Summary of DNAPL Recovery Data

Tana da in Al	less Distance	Flansed Time of	Incremental Volume of DNAPI: Removal (gall)	Total Total
world a		Daily Test (hours).	DNAPE Removal (gall)	Daily Volume
NS-15	09/24/98	0.0	2.59	1
N9-19	09124130	2.6	0.91	
	1	4.1	0.63	1
1	1 1	5.6	0.55	4.68
	09/25/98	0.0	1.73	
	00,20,00	2.0	0.37	
	1	4.0	0.67	
		6.0	0.71	3.48
	09/28/98	0.0	2.19	
1		1.9	0.68	1
		3.1	0.54	
	1	4.3	0.44	
	ji j	5.6	0.53	4.00
1	1	6.9	0.45	4.83
NS-30	09/29/98	0.0	0.86	
140-00	00/20/20	1.3	0.65	
¥.		2.9	0.61	
		4.3	0.58	2.70
	09/30/98	0.0	0.59	
H	30.00	1.3	0.62	
1	1	2.6	0.53	
1	1	3.8	0.49	i .
ı		4.9	0.54	
		6.6	0.49	3.26
NS-32	09/22/98	0.0	0.98	T
140-52	03/22/00	1.0	0.03	
		2.0	0.09	
	1	3.0	0.05	. 22
		6.6	0.07	1.22
	09/23/98	0.0	0.26	
		1.3	0.16	
		2.4	0.06	
		3.4	0.04	
1		4.4	0.04	1
		5.4	0.03	
		6.4	0.04	0.63
	09/24/98	0.0	0.28	0.28

BLASLAND, BOUCK & LEE, INC.
engineers & scientists

Figures



Designed by _ _ _ _ _ _

Drawn by ______

Checked by ______

NEWELL STREET AREA II/USEPA AREA 58 PARCEL J9-23-12

DNAPL RECOVERY SYSTEM

201.37.01F Date NOVEMBER 1998

FIGURE 2

General Electric Company Pittsfield, Massachusets

Newell Street Area II/USEPA Area 5B

DNAPL Removal Volume vs. Time: Daily Results for NS-15

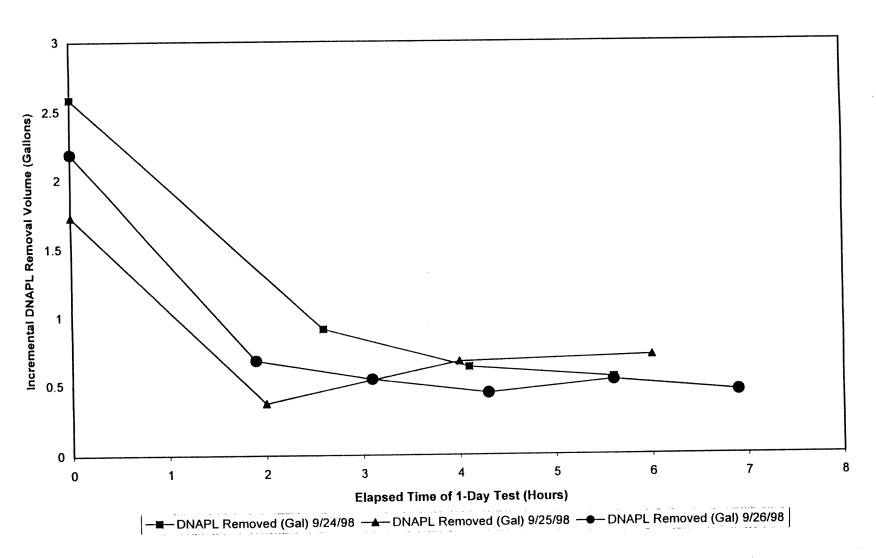


FIGURE 3

General Electric Company Pittsfield, Massachusets

Newell Street Area II/USEPA Area 5B DNAPL Removal Volume vs. Time: Daily Results for NS-30

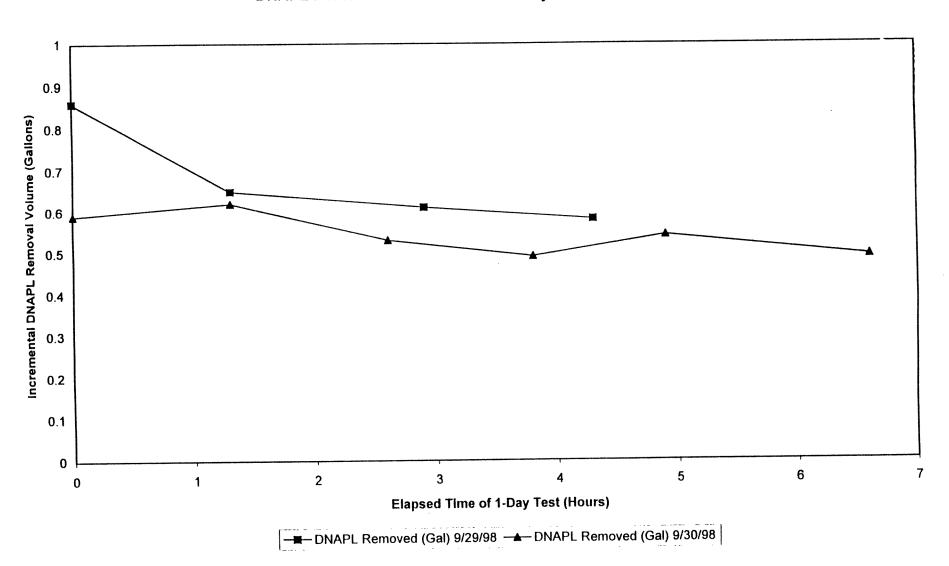
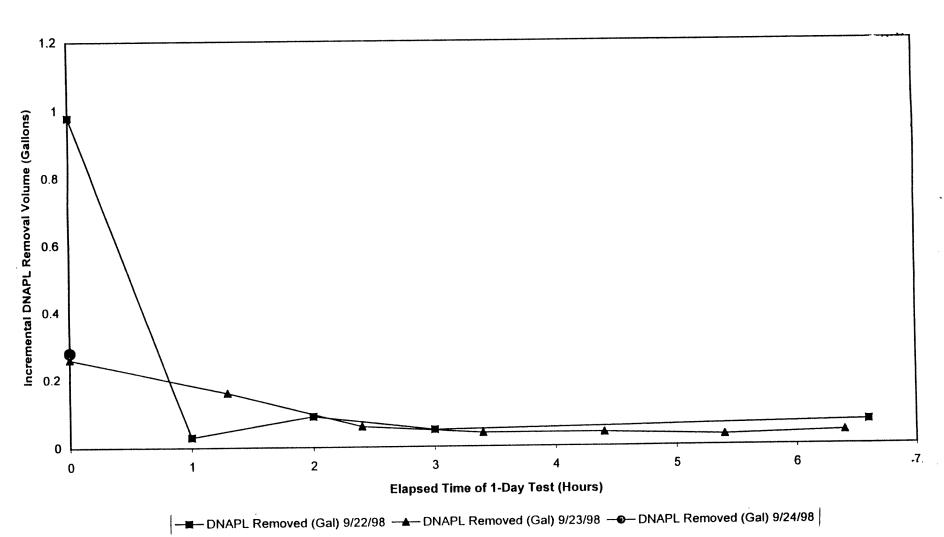


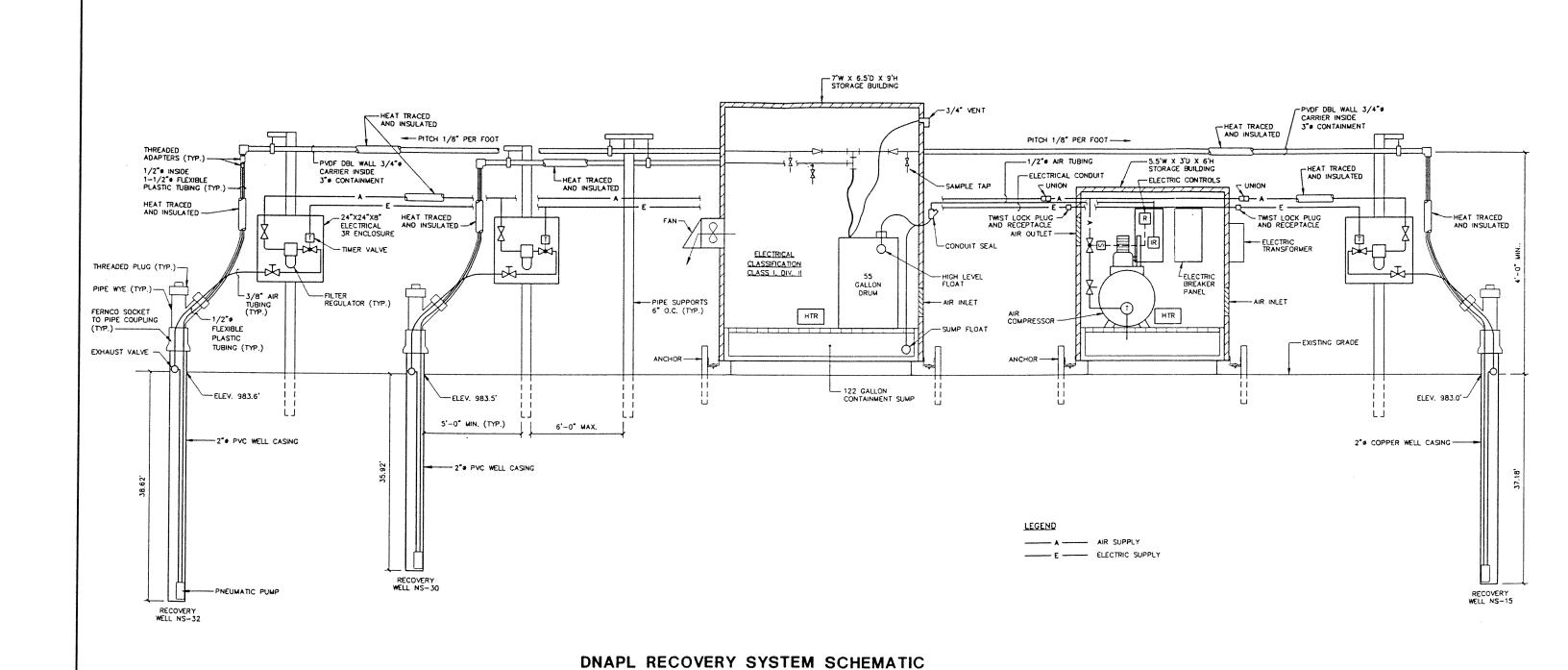
FIGURE 4

General Electric Company Pittsfield, Massachusets

Newell Street Area II/USEPA Area 5B

DNAPL Removal Volume vs. Time: Daily Results for NS-32





Project Mgr.

Designed by _ _ _ _ _ _

L: ON=*, OFF=REF P: CONT-0J0/CONT-MVB 11/24/98 SYR-54 DCC, WON 20137010/20137G02.0WG

NO ALTERATIONS DEPUITTED MEDEON SYCEDT

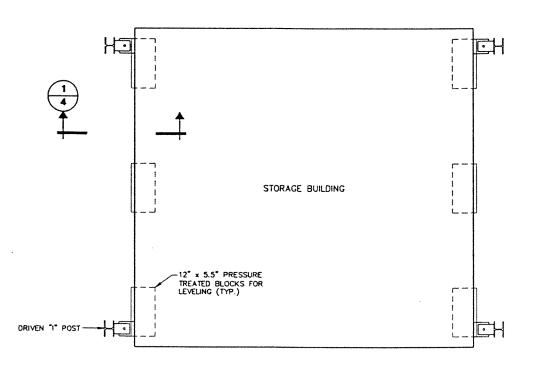
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DNAPL RECOVERY SYSTEM

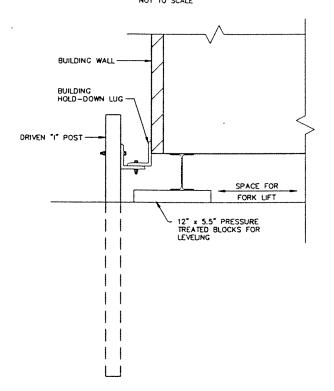
GENERAL ELECTRIC COMPANY . PITTSFIELD, MASSACHUSETTS

NEWELL STREET AREA II/USEPA AREA 5B PARCEL J9-23-12

File Number 201.37.02F

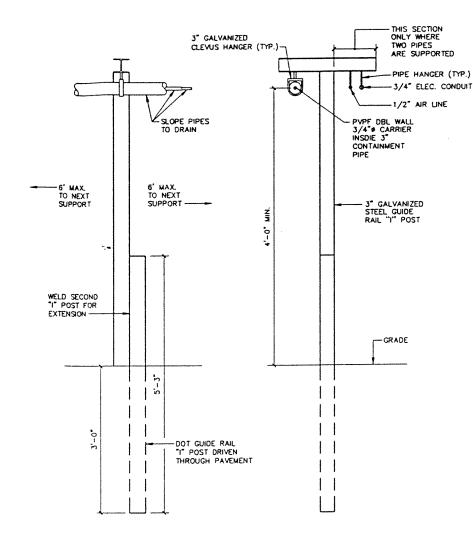


PLAN NOT TO SCALE



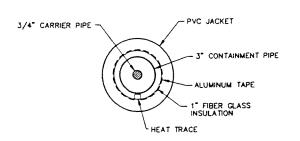
BUILDING ANCHOR





PIPE SUPPORT DETAIL

NOT TO SCALE



PIPE SECTION NOT TO SCALE



GENERAL SPECIFICATIONS:

- 1. STORAGE BUILDINGS: CHEMICAL STORAGE BUILDINGS AS MANUFACTURED BY SAFETY STORAGE. FACTORY MUTUAL APPROVED FOR STORAGE OF HAZARDOUS CHEMICALS.
- A. DRUM STORAGE BUILDING:

NOMINAL DIMENSIONS: 7.0' X 6.5' X 9.0' HIGH
122 GALLON CONTAINMENT SUMP
ELECTRICAL COMPONENTS RATED FOR A CLASS 1, DIV. 2 AREA
VENTILATION FAN (CLASS 2)
1000 WATT HEATER (CLASS 2)
100 WATT INCANDESCENT LIGHT (CLASS 2)

B. COMPRESSOR BUILDING:

NOMINAL DIMENSIONS: 5.6" X 3.0" X 6.0" HIGH 86 GALLON CONTAINMENT SUMP VENTILATION FAN 1000 WATT HEATER 100 WATT INCANDESCENT LIGHT

- RECOVERY PUMPS: PNEUMATIC DNAPL RECOVERY PUMPS AS MANUFACTURED BY QED ENVIRONMENTAL SYSTEMS, INC.
 - A. THREE (3) PUMPS PART # LP1301 FOR 2" DIAMETER WELLS
 THREE (3) MINI PULSE PUMP CYCLE TIMER, PART # MPS360, 120V,
 W/ FILTER-REGULATOR
 THREE (3) 2" DIAMETER WELL EXHAUST VALVES, PART # L353
 - B. TUBINC; 120 FT. NYLON; PART # L417, < 00 LIQUID, 3/8" OD AIR TUBINC; 50 FT. UV-BLACK NYLON, PART # 35097, < 00 TUBINC; 75 FT. 3/8" NYLON AIR, PART # 35716 TUBINC; FITTINGS; MISC. FITTINGS PACKAGE, PART # PP-CUSTOM

3. PIPING:

- A. DOUBLE-WALL PRODUCT PIPE: GUARDIAN PIPING SYSTEMS BY CHEMTROL; 3/4" PVOF CARRIER PIPE W/ 3" PVOF CONTAINMENT PIPE. THERMAL FUSED WELDED JOINTS.
- B. FLEXIBLE PRODUCT TUBING: 1/2" INSIDE; NALGENE 880 KYNAR BY THE NALGE COMPANY. 1-1/2" OUTSIDE; NALGENE 689 POLYPROPYLENE COPOLYMER TUBING.
- C. AIR TUBING: $1/2^{\sigma}$ GALVANIZED STEEL, THREADED PIPING. USE TEFLON TAPE ON JOINTS.
- THREE (3) TIMER AND REGULATOR ENCLOSURE: HOFFMAN STEEL ENCLOSURE, 24"X 24"X 8", CATALOG # A-24R248HCR. PADLOCK HASP, CONTINUOUS HINGE.
- 5. AIR COMPRESSOR: 3 HP, CAST IRON, OIL LUBRICATED, AIR COMPRESSOR DAYTON STOCK NUMBER 48237. 30 GALLON HORIZONTAL TANK, THREE PHASE, 460 VOLT MOTOR, DEVELOP 9.4 CFM AT 90 PSI. FURNISH WITH AUTOMATIC, TIMER CONTROLLED DRAIN BLOW-OFF.
- 6. HEAT TRACE: THERMON TYPE FD; FM RATED CLASS 1, DIV. 2; 5 WATTS PER FOOT, 120 VAC, ET-7 END CAPS, TBX-4LC CONNECTORS AS NEEDED.
- 7. HEAT TRACE CONTROLS: THREE THERMON N-7G-040 THERMOSTATS.
- 8. INSULATION: 3" CONTAINMENT: 1" THICK FIBERGLASS W/PVC JACKET. 1/2" AIR: USE 3/4" URETHANE FOAM.

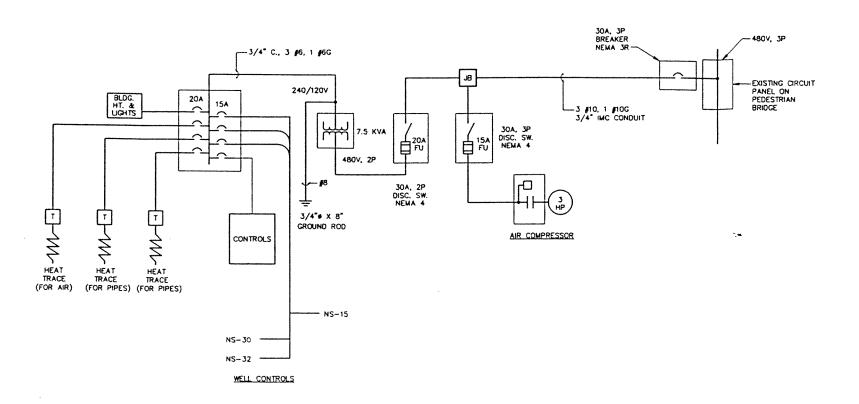
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NEWELL STREET AREA II/USEPA AREA 5B PARCEL J9-23-12

File Number 201.37.03F

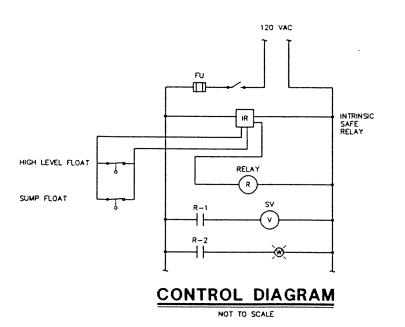
Date NOVEMBER 1998

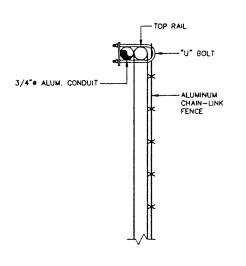
Blasland, Bouck & Lee, Inc. Corporate Headquarters



ELECTRICAL ONE-LINE DIAGRAM

NOT TO SCALE





SUPPORT DETAIL

NOT TO SCALE

L: ON=*. OFF=REF P: CONT-0J0/CONT-MV8 11/17/98 SYR-54 DCC, WON 20137010/20137G04.DWG

| No. | Date | Rewsions | Init | Project Mgr. | Designed by | Drawn by | Checked by

BBBL
BLASLAND, BOUCK & LEE, INC.

ELECTRICAL SPECIFICATIONS;

FOUR(4) 15 A, 1P BREAKERS.

1. GENERAL ELECTRIC DRY TYPE QMS, CATALOG # 9T21B100BG02

INDOOR/OUTDOOR, 7.5 KVA, 480 VOLT SINGLE PHASE PRIMARY, 120/240 VOLT SECONDARY.

 GENERAL ELECTRIC SERIES AL, 100 AMP MAIN BREAKER, 12 BRANCH CIRCUIT, 10,000 AMPS RMS SHORT CIRCUIT. FOUR (4) 20 A, 1P BREAKERS.

4. FLOATS: GEMS PART # LS 1800 SLIDING MAGNETIC SWITCH, ALL TEFLON TYPE.

WITH 2" MALE BRASS THREADED PLUG.

A. BARREL FLOAT, 1-1/4" DIAMETER, 1/8" NPT THREADED STEM, FURNISH

 INTRINSIC RELAY: GEMS SAFE-PAK, SOLID STATE INTRINSIC SAFE RELAY, UL, FM APPROVED FOR PROTECTION OF CIRCUITS IN CLASS 1, DIV. 1 AREAS.
 RELAYS: ICE CUBE, PLUG-IN WITH SOCKET, DPDT, 120 VOLT, 5 AMP RATED CONTACTS.

 CONDUIT: IMC RATED ALUMINUM CONDUIT, 3/4" DIAMETER, COMPRESSION COUPLINGS FOR OUTDOOR USE, THREADED CAST FITTINGS AND DEVICE/JUNCTION BOXES.

B. SUMP FLOAT, 1-1/4" DIAMETER, 1/8" NPT THREADED STEM, FURNISH WITH

2. GENERAL ELECTRIC FUSED SAFETY DISC. SWITCHES: NEMA JR, HEAVY DUTY TYPE TH.

GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS

NEWELL STREET AREA II/USEPA AREA 5B PARCEL J9-23-12

File Number 201.37.04F	
Date NOVEMBER	1998

FIGURE 8

GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS NEWELL STREET AREA II/USEPA AREA 5B

SCHEDULE FOR PREPARATION AND INSTALLATION OF DNAPL RECOVERY SYSTEM

Work Activities	Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8	Week 9	Week 10	Week 11
Submit DNAPL Recovery System for Newell Street Parking Lot to Agencies											
Receive Agency Approval										:	
Install Pumps									,		
Submit DNAPL Recovery System for Newell Street Parking Lot to PCC											
Perform Enhanced Manual Removal		- 1797 - 1898 - 1797 - 1875							TO THE		135 % B
Receive PCC Approval		***********									
Purchase and Receive Enclosures and Remaining Equipment						4					
Install Piping, Enclosures, and Remaining Equipment									手机 模型		

Notes:



- Submittal/Approval Date

- Activity Duration

PCC - Pittsfield Conservation Commission

DNAPL - dense nonaqueous phase liquid