WESTON Ref. No.

07-0008
SDMS 157091

United States Environmental Protection Ag
Region I
One Congress Street, Suite 1100
Boston, MA 02114-2023

March 17, 1999

Mr. Andrew T. Silfer, P.E.
General Electric Company
100 Woodlawn Avenue
Pittsfield, Massachusetts 01201

RE: Conditional Approval of GE's *Source Control Investigation Report, Upper Reach of the Housatonic River (First ½ Mile)*, prepared by HSI Geotrans, dated February 9, 1999

GE submitted the above-referenced report to EPA on February 9, 1999. Based on a review of GE's submittal and on discussions with GE, EPA conditionally approves the above-referenced submittal subject to the following comments:

Requirements for additional borings/wells

Newell Street

GE shall install one additional intermediate depth boring/well in the area southwest of MW-1S and 1D to delineate the extent of DNAPL in this area.

If any of the proposed borings/wells collect free-phase DNAPL, then additional borings/wells to delineate the extent of DNAPL may be required.

Lyman Street

To assist in determining the northern extent of DNAPL, GE shall install an additional intermediate depth boring/well at a location between LS-8 and LS-28.

Well LS-43 has no cap, either protective or internal. GE shall inspect, repair (or replace if warranted) and re-monitor this well. Repair may include redevelopment of the well. GE shall also inspect and, if necessary, repair monitoring wells LS-44 and LS-45.

If wells LS-43, 44 or 45 or the borings/wells required pursuant to this investigation collect free-phase DNAPL, then additional borings/wells to delineate the extent of DNAPL may be required.

Comparison of LNAPL vs. DNAPL

GE shall provide a comparison of the LNAPL vs. the DNAPL at both the Lyman Street and Newell Street Parking Lots. This comparison shall include the chemical constituents, density, and viscosity. For the Newell Street Parking Lot, GE shall evaluate whether or not the LNAPL at NS-10 may be perched DNAPL. For the Lyman Street Parking Lot, the shallow depth of silt/till may result in a mixing of the LNAPL and DNAPL. GE shall provide a comparison of the LNAPL and DNAPL to confirm that they are separate contaminant plumes and to assist in distinguishing/delineating the plumes.

Also, EPA's Conditional Approval GE's Source Control Work Plan required the analysis of density and viscosity be performed when any samples of NAPL were collected. Please provide the results of the density and viscosity for the NAPL samples collected and include the results in the above-referenced comparison.

Incorporation of Monitoring Wells into Existing Monitoring Programs

GE shall submit a proposal to include the wells installed pursuant to source control activities to GE's existing monitoring programs.

Potential Errors and Omissions in the Report

Figures 3-2, 5-1

The elevation of the top of silt/till layer at location N2SC-03I may be incorrect. HSI/Geotrans identifies the top of silt/till at 947.53. Weston's boring logs identify the top of the silt at a depth of no greater than 946.53 ft, although the sample which confirms the presence of the silt was collected from 945.53 to 944.73 ft, below a 1-ft interval of no sample recovery. HSI/Geotrans appears to be identifying the top of the silt/till approximately one to two feet higher, as a silty sand with gravel underlying a dark-stained sand and gravel. A comparison of HSI/Geotrans and Weston boring logs show that non-recovery of samples is depicted as a data gap in Weston boring logs, while the data collected immediately above the data gap is extrapolated across the data gap in HSI/Geotrans boring logs. The HSI/Geotrans boring log appears to show that the silty sand extends continuously downward to the silt, which makes the higher elevation for the top of the silt/till seem reasonable. The Weston boring log, showing the data gap, indicates that a deeper top of silt/till is better supported by the data. The selection of the silt, rather than the silty sand, as the top of the silt/till is more consistent with the selection made at other locations at the Newell Street Area 2 site.

Figure 5-1

Top of silt/till elevations were omitted for locations 3-6C-EB-23 to -29. Addition of the top-of-till elevations at these locations would better define the topography in this area.

The top of silt/till elevation for location LSSC-01 is 952.52 (noted correctly on Figures 4-2 and 4-8) not 953.52 ft.

The 950-ft depression contour located in the vicinity of Newell Street Area 2 should extend farther northward, as the top of the silt/till elevation at location E2SC-15 is 950.3 ft.

Figure 5-2

A spot check of analytical results noted some errors. In soil boring E2SC-15, analytical data contained in the Proposal for Supplemental Source Control Containment/Recovery Measures, January 1999, does not agree with the posted total PCB results in Figure 5-2. Total PCB data for the zero to 1-ft interval bgs is not included in Table 2-4 (although Weston field notes confirm that a sample was collected from this interval, as does HSI/Geotrans Table 2-1). Further the total PCB concentration for the 1 to 6-ft interval bgs is reported as 8 mg/kg on Figure 5-2, but is actually 80 mg/kg in Table 2-4 in the same reference.

GE shall consider these comments in future submittals.

Additional Work

1. GE has proposed conducting additional investigative activities as part of their February 16, 1999 submittal titled *Conceptual Barrier Design for Lyman Street Site*. EPA is in the process of reviewing this submittal. Subsequent to the completion of the investigative activities proposed and approved in the Lyman Street submittal, EPA may require additional investigative activities including, but not limited to, the advancement of borings in the Housatonic River and the installation of intermediate depth borings/wells on the south side of the Housatonic River, opposite the Lyman Street Parking Lot.

2. EPA may require additional source control response actions subsequent to the completion of investigative activities required by this conditional approval letter. Furthermore, additional performance standards, objectives and other requirements for NAPL monitoring, containment, and/or recovery will be included in the Scope of Work for Removal Actions Outside the River, which is currently being negotiated by GE, EPA and other government agencies.

Schedule

GE shall initiate the installation of the required borings/well by March 30, 1999. Within 45 days of completing the boring/well installations, GE shall submit a report that includes the following:

- A summary of the investigative activities required by this approval letter
- A proposal for inclusion of the monitoring wells installed pursuant to source control investigative and response activities into GE's existing monitoring programs

- The evaluation of the comparison of LNAPL vs. DNAPL at the Newell and Lyman Street Parking Lots, and
- Additional proposed activities, if any

If you have any questions, please contact me at (617) 918-1282.

Sincerely,

Dean Tagliaferro
On-Scene Coordinator

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Site File