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SDMS 158125

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

February 29, 2000

Mr. Andrew T. Silber, P.E.  
Corporate Environmental Programs  
General Electric Company  
100 Woodlawn Avenue  
Pittsfield, Massachusetts 01201

**RECEIVED**

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**BERKSHIRE**  
**REGIONAL PLANNING COMMISSION**

**RE: Conditional Approval of GE's January 14, 2000 submittal entitled *DNAPL Recovery Data and Evaluation at the Newell Street II Area, Plant Site 1 Groundwater Management Area; GE-Pittsfield/Housatonic River Site***

On January 14, 2000, General Electric (GE) submitted the above-referenced document to EPA and the Massachusetts Department of Environmental Protection (DEP). This report is subject to the terms and conditions specified in the Consent Decree that was lodged in District Court on October 7, 1999 (the "Consent Decree"). Pursuant to Paragraph 73(b) of the Consent Decree, EPA, after consulting with the Massachusetts DEP, approves the above-referenced submittal subject to the following conditions:

1. GE proposed conducting additional pumping over a three-day period in wells N2SC-02 and N2SC-03I and to submit to EPA a proposal for "future activities" within 30 days of approval of the above-referenced submittal. EPA anticipates that this submittal will include the design of an automated DNAPL collection system for these two wells and that the "future activities" will consist of the schedule for the installation and start-up of the DNAPL collection system for these two wells.
2. The potential reasons for the fluctuation in DNAPL recovery rates for well N2SC-01I were not presented in the above-referenced submittal. GE shall perform an evaluation of the potential reasons for the decrease in DNAPL recovery to ensure that the recovery of DNAPL from this well is optimized. The results of this evaluation and the results of the additional pumping and proposed future activities for wells N2SC-02 and N2SC-03I shall be submitted to EPA within 30 days of receipt of this letter.
3. Technical Attachment H of Appendix E to the Consent Decree requires GE to include in the six-month evaluation of the Newell Street Area II portion of the Site "proposed modifications or additions, if any, to the NAPL recovery systems necessary to optimize NAPL recovery." The extremely high recovery rate of DNAPL from well N2SC-01I and the fact that wells N2SC-02 and N2SC-03I still have DNAPL thicknesses greater than four

feet indicate that significant quantities of DNAPL remain in the Newell Street II Area and that the influence of the existing DNAPL recovery wells may be limited to the immediate vicinity of the well (e.g., several feet to tens of feet) due to geologic controls on DNAPL distribution and movement.

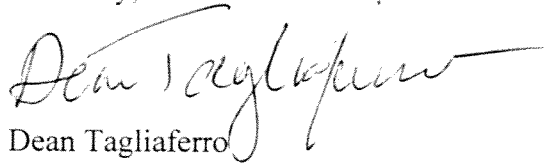
Therefore, EPA has determined that it is appropriate at this time to investigate the possibility of expanding the automated DNAPL collection system beyond the activities proposed by GE. These investigations/enhancements shall include the installation of at least three additional observation/recovery wells in the vicinity of well N2SC-01I to further monitor the effects of recovery at N2SC-01I, and, based on DNAPL recovery tests, potentially add these new wells to the automated DNAPL collection system. The wells shall have a minimum diameter of 4 inches to allow for future use of enhancements (e.g., dual-pump systems) to the recovery techniques that are currently being used, if warranted. The required locations for these three wells with respect to N2SC-01I are west to southwest toward wells N2SC-02 and 03I; northwest toward the river and recovery wells NS-15, 30, and 32; and southeast toward well N2SC-08. These observation/recovery wells shall be located within approximately 50 ft of N2SC-01I. Other potential locations, where little information appears to be available, are east and northeast of N2SC-01I.

GE shall provide a proposal for the installation of these additional wells within fifteen days of receipt of this letter. This proposal shall include the following items: a map identifying proposed well locations; investigative and well installation procedures (e.g., case and wash); and a schedule for investigation activities including well installation, recovery tests, evaluation of data, and, if appropriate, the installation of automated DNAPL collection systems into these wells.

EPA's approval of this submittal does not preclude EPA from requiring additional investigations and response activities pursuant to the Consent Decree and/or the *Statement of Work for Removal Actions Outside the River* (Appendix E to the Consent Decree) in the future. Furthermore, in the event the Consent Decree does not get entered by the Court, EPA reserves the right to require additional investigations and response activities pursuant to its statutory and regulatory authorities reserved under the Consent Decree including, but not limited to, the Resource Conservation and Recovery Act ("RCRA") and the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA").

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

Sincerely,



Dean Tagliaferro  
On-Scene Coordinator

cc: John Ciampa, GE  
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