WESTON Ref. No.
01-0085

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

SDMS 158738

August 24, 2000

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
Plant Site 1 Groundwater Management Area (GECD310)
Proposal for Groundwater Investigation Near 10 Lyman Street Property

Dear Mr. Olson:

At the request of the U.S. Environmental Protection Agency (EPA), the General Electric Company (GE) is submitting this letter as a proposal to conduct a limited groundwater investigation in the vicinity of an existing building located at 10 Lyman Street in Pittsfield, Massachusetts, within the Lyman Street Area portion of the Plant Site 1 Groundwater Management Area (GMA 1). The purpose of this investigation is to obtain up-to-date groundwater data from this area so as to evaluate the potential for volatilization and upward migration of certain constituents in groundwater into the indoor air of the existing building at 10 Lyman Street. Although comprehensive groundwater sampling will be conducted at GMA 1 pursuant to the October 7, 1999 Consent Decree (following its entry by the court), GE is voluntarily submitting this proposal for limited advance sampling in this particular area, at EPA's request, due to the potential for occupancy of the 10 Lyman Street building by a new tenant.

Background Information

Previous investigations conducted in this area include a *MGL Chapter 21E Property Assessment* completed in February 1988 by Scalise-Knysh Associates, Inc. (S-K) and a *Site Assessment Update* completed by O'Brien & Gere Engineers, Inc. (OBG) in March 1993. In addition, a well inventory was conducted by GE on August 11, 2000, to assess the condition of the six wells which were installed during the S-K and OBG site assessment activities. The results of these site assessments are discussed below.

Six monitoring wells were installed and sampled during prior site assessment activities at 10 Lyman Street. The well locations are illustrated on Figure 1. Wells MW-1, MW-2, MW-3, and MW-4 were installed in 1988. Each of these wells was constructed with 2-inch diameter PVC casing and five feet of PVC well screen extending to depths of either 15 or 16 feet below the ground surface. Wells MW-5 and MW-6 were installed in 1992. These wells were also constructed with 2-inch diameter PVC casing and well screen, but with 15-foot screen segments extending to a depth of 20 feet below the ground surface in each well.

Groundwater samples were collected from wells MW-1, MW-2, MW-3, and MW-4 following their installation in 1988 and were analyzed for certain volatile organic compounds (VOCs), pesticides/PCBs, and dissolved metals. In 1993, these wells were sampled again, along with wells MW-5 and MW-6, and the samples were analyzed for certain VOCs. The measured depths to groundwater in these wells range between approximately 8 and 12 feet below grade. Based on the depth to groundwater and the proximity of this groundwater to the building at 10 Lyman Street, groundwater in this area is classified as falling in

Category GW-2 under the Massachusetts Contingency Plan (MCP). A comparison of the previous groundwater analytical results with applicable MCP Method 1 GW-2 standards is presented in Table 1. No constituents for which such standards exist were found in this groundwater at levels above their respective MCP Method 1 GW-2 standards.

In addition to the prior investigations conducted at these wells, shallow groundwater samples were more recently collected and analyzed from a monitoring well located along the eastern edge of the 10 Lyman Street building. Specifically, well LSSC-16S was sampled on March 13, 1999, and analyzed for constituents listed in Appendix IX of 40 CFR Part 264, plus 2-chloroethylvinyl ether, benzidene, and 1,2-diphenylhydrazine. The results of this investigation were presented in a report entitled *Source Control Investigation Addendum Report – Upper Reach Housatonic River (First ½ Mile),* prepared by HSI GeoTrans, Inc. on June 15, 1999. The only VOC detected in the LSSC-16S groundwater sample was acetone (a common laboratory contaminant) at a concentration of 0.0046 parts per million (ppm), which is well below the MCP Method 1 GW-2 standard of 50 ppm for this compound. In addition, no semi-volatile organic compounds (SVOCs) were detected in this groundwater sample.

On August 11, 2000, GE representatives conducted a preliminary reconnaissance of monitoring wells MW-1 through MW-6. During this reconnaissance, two wells (MW-3 and MW-4) were observed to be in satisfactory condition, two wells (MW-2 and MW-6) were found to be unusable due to damage and obstructions, and the remaining two wells (MW-1 and MW-5) were not located.

Proposed Additional Investigations

To further assess groundwater conditions in the vicinity of the building at 10 Lyman Street, GE proposes to collect groundwater samples from wells MW-3 and MW-4 and submit them for analysis of VOCs and SVOCs. As shown on Figure 1, both of these wells are in close proximity to the building. The results from well MW-3 will provide data from upgradient of the building, while the results from well MW-4 will provide downgradient data very close to the portion of the building that may be occupied by the new tenant.

Prior to the sample collection, GE will re-develop these wells. In addition, if the remaining MW-series wells can be located or repaired, they will also be re-developed, as some of these wells have been proposed to be utilized in GE's baseline monitoring program for GMA 1.

GE will also survey these wells to obtain precise location and elevation data. During prior investigations, well elevations were measured in relation to an arbitrary datum, and it is unclear whether the well locations illustrated in the site assessment reports represent surveyed locations or are approximate locations.

Following receipt of the analytical results from the proposed sampling, GE will compare those results to the applicable MCP Method 1 GW-2 standards. If any exceedences of those standards are identified, GE will evaluate those results and, if necessary, develop a proposal for further investigative or assessment activities.

Schedule

GE proposes to initiate the field investigations described above immediately following EPA approval of this proposal. The results of the proposed groundwater sampling and analysis will be submitted to EPA as soon as possible thereafter, but no later than 45 days from such approval, together with an evaluation

of the analytical results in relation to the MCP Method 1 GW-2 standards and, if necessary, a proposal for additional activities.

If you have any questions on this matter, please contact John Novotny or me in the GE Pittsfield office.

Very truly yours,

Andrew T. Silfer /TH for

Andrew T. Silfer, P.E.
GE Project Coordinator

cc: M. Nalipinski, EPA
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J. Nuss, BBL
Public Information Repositories ECL-1-IV(A)(1)
GE Internal Repositories

PRELIMINARY ANALYTICAL DATA
SUBJECT TO VERIFICATION

TABLE 1

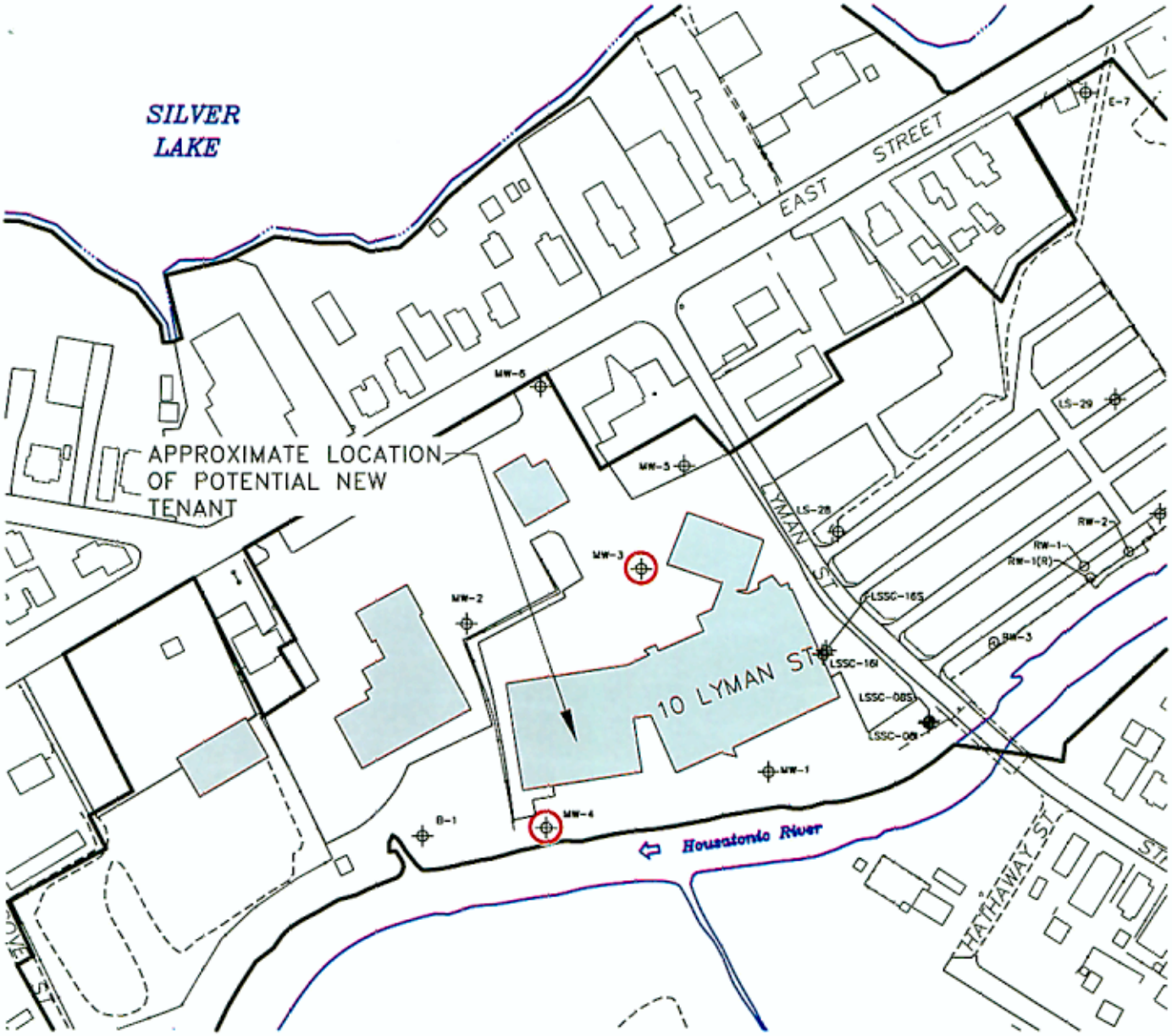
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

MCP METHOD 1 GW-2 STANDARD ASSESSMENT
10 LYMAN STREET GROUNDWATER ANALYTICAL DATA
(Results are presented in parts per million, ppm)

Sample ID: / Date Collected:	MCP METHOD 1 GW-2 STANDARD	MW-1 January-88	MW-1 February-93	MW-2 January-88	MW-2 February-93	MW-3 January-88	MW-3 February-93	MW-4 January-88	MW-4 February-93	MW-5 February-93	MW-6 February-93
Volatile Organics											
Acetone	50	ND (0.01)	NS	ND (0.01)	NS	ND (0.01)	NS	ND (0.01)	NS	NS	NS
Benzene	2	0.00517	ND (0.005)	ND (0.001)	ND (0.005)	0.284	0.51	ND (0.001)	ND (0.005)	0.254	0.238
Bromoform	0.8	ND (0.01)	NS	ND (0.01)	NS	ND (0.01)	NS	ND (0.01)	NS	NS	NS
Bromomethane	0.002	ND	NS	ND	NS	ND	NS	ND	NS	NS	NS
Carbon Tetrachloride	0.02	ND (0.005)	NS	ND (0.005)	NS	ND (0.005)	NS	ND (0.005)	NS	NS	NS
Chlorobenzene	1	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	NS	NS
Chloroform	0.4	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	NS	NS
1,2-Dichlorobenzene	10	ND (0.005)	NS	ND (0.005)	NS	ND (0.005)	NS	ND (0.005)	NS	NS	NS
1,3-Dichlorobenzene	10	ND (0.005)	NS	ND (0.005)	NS	ND (0.005)	NS	ND (0.005)	NS	NS	NS
1,4-Dichlorobenzene	30	ND (0.005)	NS	ND (0.005)	NS	ND (0.005)	NS	ND (0.005)	NS	NS	NS
1,1-Dichloroethane	9	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	NS	NS
1,2-Dichloroethane	0.02	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	NS	NS
1,1-Dichloroethene	0.001	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	NS	NS
trans-1,2-Dichloroethene	20	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	NS	NS
1,2-Dichloropropane	0.009	ND (0.005)	NS	ND (0.005)	NS	ND (0.005)	NS	ND (0.005)	NS	NS	NS
Ethylbenzene	30	0.221	ND (0.005)	ND (0.001)	0.065	0.157	0.057	ND (0.001)	ND (0.005)	0.375	0.795
Methylene Chloride	50	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	NS	NS
Methyl Ethyl Ketone	50	ND (0.01)	NS	ND (0.01)	NS	ND (0.01)	NS	ND (0.01)	NS	NS	NS
Methyl t-Butyl Ether	50	NS	ND (0.005)	NS	ND (0.005)	NS	ND (0.005)	NS	ND (0.005)	ND (0.005)	ND (0.005)
1,1,2,2-Tetrachloroethane	0.006	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	NS	NS
Tetrachloroethene	3	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	NS	NS
Toluene	6	0.0026	ND (0.005)	ND (0.001)	0.141	0.0914	ND (0.05)	ND (0.001)	ND (0.005)	<0.025	3.243
1,1,1-Trichloroethane	4	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	NS	NS
1,1,2-Trichloroethane	20	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	NS	NS
Trichloroethene	0.3	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	ND (0.001)	NS	NS	NS
Vinyl Chloride	0.002	ND	NS	ND	NS	ND	NS	ND	NS	NS	NS
Total Xylenes	6	0.18	ND (0.005)	ND (0.001)	0.331	0.234	1.555	ND (0.001)	ND (0.005)	1.334	3.17
Pesticides											
Aldrin	0.005	ND (0.000005)	NS	ND (0.000005)	NS	ND (0.000005)	NS	ND (0.000005)	NS	NS	NS

Notes:

1. January 1988 samples were collected by Scalisw-Knysh Associates, Inc. and submitted to Lycott Environmental Research, Inc. for analysis.
2. February 1993 samples were collected by O'Brien & Gere Engineers, Inc. and submitted to Analytics Environmental Laboratory, Inc. for analysis.
3. Only constituents for which MCP Method 1 GW-2 Standards exist are summarized.
4. ND - Not Detected - The number in parantheses is the associated quantitation limit for the constituent, if provided by the analytical laboratory.
5. NS - Not Sampled - Parameter was not requested on sample chain of custody form.



LEGEND

- SITE BOUNDARY
- MW-1 EXISTING MONITORING WELL
- RW-3 ACTIVE PUMPING WELL
- WELL PROPOSED FOR GROUNDWATER SAMPLING

0 200' 400'

GRAPHIC SCALE

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 AND BOUCK ENGINEERS, P.C. CONSTRUCTION PLANS.
2. NOT ALL PHYSICAL FEATURES SHOWN.
3. SITE BOUNDARY IS APPROXIMATE.
4. ALL MONITORING WELL LOCATIONS ARE APPROXIMATE.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

10 LYMAN STREET PROPERTY

SITE PLAN

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

FIGURE 1

X: 20182X01
P: STD-AP
8/24/00 SYR-54-JER
20182001/20182827.DWG