



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

01-0452  
SDMS 160280

February 7, 2002

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 Company's (GE) August 30, 2001 report titled Plant Site 1 Groundwater Management Area NAPL Monitoring Report for Spring 2001, GE Housatonic River Project Site, Pittsfield, Massachusetts.**

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced August 30, 2001 report titled Plant Site 1 Groundwater Management Area NAPL Monitoring Report for Spring 2001.

The Plant Site 1 Groundwater Management Area NAPL Monitoring Report for Spring 2001 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 following conditions:

1. Figures 3 and 4 depict the extent of NAPLs observed beneath the site. The figures also include the locations of monitoring wells located in GMA-1. However, not all the wells in either figure are screened at an appropriate interval to detect LNAPL or DNAPL. The present format of the figures implies to show non-detection of NAPL between two NAPL-bearing wells which would otherwise be interpreted as a single NAPL area, artificially breaking up what would otherwise be interpreted as a larger area of NAPL.

For future NAPL monitoring reports, GE shall modify the figures showing LNAPL and DNAPL extent to include only the wells that are screened at an appropriate interval and designed to detect LNAPL or DNAPL, respectively. This modification will also make the figures easier to read, by removing extraneous well locations.

2. Regarding the extent and migration of NAPL in GMA-1, the primary controlling factors should be depicted in the report. GE includes two figures (Figures 5 and 6) that portray April and June groundwater contours across GMA-1, which provide insight into the extent and migration of LNAPL. However, GE did not include a figure portraying the elevation of the top of the till unit across GMA-1. GE shall provide a figure that depicts the contours of the top of the till unit beneath GMA-1 in all future NAPL Monitoring Reports, in order to provide insight of one component which influences the extent and migration of DNAPL.
3. The GMA-1 area contains pockets of NAPL (identified on Figures 3 and 4) where no collection is discussed in the Report. All the individual areas where NAPL is detected should be discussed in the GMA-1 NAPL Monitoring Reports. GE shall address all GMA-1

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NAPL areas in future reports, including the NAPL areas discovered during the ½-Mile Removal Action.

4. In future NAPL Monitoring Reports, figures should show the locations of: the former oxbows; referenced landmarks, such as the former Berkshire Gas facilities, building 12-G and the 12-F tank farm; and, various outfalls. These locations are referenced in the text, but not illustrated in the figures.
5. Wells mentioned in the text are not consistently found on the figures. Examples include wells P-R, QQ-R, LL-R, M-R, 25R and 26R (page 2-17), and wells E2SC-03I and HR-C-RW-1 (page 3-3), and Lyman Street Area wells MW-6R, LSSC-09 and LS-11. GE shall provide maps showing the locations of all wells discussed or listed in future NAPL Monitoring Reports.
6. Tables of routine monitoring data (such as Table D-2) shall be sorted first by well name and then by date to allow changes in the amount of detected NAPL to be easily tracked over time for an individual well in future NAPL Monitoring Reports. In addition, GE shall provide the data for future NAPL Monitoring Reports in electronic format as either a spreadsheet or a database to allow for further evaluation.

EPA reserves its right to perform additional sampling related to the Plant Site 1 Groundwater Management Area NAPL and/or to 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 Nalipinski  
GE Facility Project Manager

cc: Andrew Silber, GE  
John Novotny, GE  
J. Lyn Cutler, MA DEP  
Sue Keydel, MA DEP  
Bryan Olson, US EPA  
Holly Inglis, US EPA  
John Kilborn, US EPA  
K.C. Mitkevicius, USACE  
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