



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

01-0516
SDMS 160527

August 29, 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 concerning General Electric Company's (GE) June 2002 *Plant Site 1 Groundwater Management Area NAPL Monitoring Report for Fall 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 *Plant Site 1 Groundwater Management Area NAPL Monitoring Report for Fall 2001* (Report). The Plant Site 1 Groundwater Management Area is also referred to as GMA-1.

This Report 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.

EPA's review of the Report focused on the comments contained in EPA's April 26, 2002 letter concerning GMA-1 non-aqueous phase liquid (NAPL) technical and reporting issues. The content of the Report is very informative and GE addresses all of EPA's comments, however, some of EPA's issues were not completely addressed or resolved. The unresolved issues do not have to be resolved as a condition of EPA accepting this document, but shall be addressed in subsequent GE Fall GMA 1 NAPL reports.

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:

Conditions

- 1. EPA's April 26, 2002 Letter, Comment No. 11.** Although GE provided updated cross-sections in the Report, the cross-sections did not include NAPL observations identified in boring logs, as requested. The cross-sections contained in GE's 1999 Source Control Investigation Reports further provide an excellent graphic summary of GMA-1 NAPL information showing soil boring PCB data, well screen intervals, NAPL observations, water table elevations, NAPL elevations in wells and detailed geology. GE shall utilize updated versions of these 1999 cross-sections in subsequent GMA-1 Fall NAPL monitoring reports. Additionally, GE shall incorporate new Removal Action Area (RAA) pre-design investigation soil boring data into future GMA-1 Fall NAPL reports.

2. **EPA's April 26, 2002 Letter, Comment No. 12.** The Report provides an updated elevation contour map of the glacial till surface, but does not delineate other silt/peat confining layers detected during the ½-Mile Removal Action and the Source Control Investigation. Although these layers may be thin and localized, they are critical because they tend to be located near the river at elevations corresponding to the river bottom. NAPL associated with these layers could potentially discharge to the river. The new RAA soil boring data at Newell Street, Lyman Street and East Street Area 2-South should provide additional data that can be used to further delineate the depth and extent of these silt/peat confining layers. GE shall incorporate new RAA data into the existing GMA-1 maps and cross-sections and delineate the extent of these localized silt/peat layers in future GMA-1 Fall NAPL reports.
3. **EPA's April 26, 2002 Letter, Comment No. 18.** The updated MODFLOW groundwater flow model and scenarios for East Street Area 2 presented in Appendix F meet EPA's requirements, however, EPA has technical questions concerning several aspects of the model including the definition of recharge areas, boundary conditions, and the handling of river/recharge pond nodes. EPA believes that these questions can be resolved during a separate technical meeting covering groundwater-modeling issues. GE shall coordinate with EPA, during the next monthly Outside the River status meeting, to set up a GMA-1 groundwater-modeling meeting.
4. Preliminary review of the Cell G2 sheetpile barrier high flow conditions assessment data, provided in the May 2002 Monthly Report, suggests that groundwater mounding behind the sheetpile barrier is greater than anticipated. Even during dry conditions, the groundwater elevation difference between riverbank wells HR-G2-MW2 (behind barrier) and HR-G2-MW1 (upstream of barrier) averaged approximately 0.9 feet. Higher than anticipated groundwater mounding could facilitate the movement of LNAPL around the Cell G2 sheetpile barrier (or other GE containment barriers). GE shall provide an assessment of this data and any additional data collected this fall in the upcoming GMA-1 NAPL Monitoring Report for Fall 2002.
5. During the document review, EPA developed several questions concerning GE's NAPL recovery and groundwater treatment operations. GE shall provide additional information concerning the following issues during technical discussions or in future GMA-1 Fall NAPL reports:
 - a. Has GE considered lowering the NAPL recovery well groundwater pump intake elevations during seasons with low groundwater levels to potentially enhance LNAPL recovery? Do the individual recovery well designs allow for the changing of groundwater pump intake elevations? This drop off in NAPL recovery associated with lower groundwater levels should be discussed further in relation to the design of the recovery systems.
 - b. Does GE monitor and record the volume of treated groundwater being discharged into the Recharge Pond? This information would help quantify the amount of groundwater recharge associated with the Recharge Pond.
 - c. Has GE ever conducted an assessment of potential groundwater flow stagnation points (and by association potential LNAPL flow stagnation points) related to the recovery system at East Street Area 2?

The EPA reserves its right to perform additional sampling and monitoring in GMA-1 and/or 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 J. Nalipinski
GE Facility Project Manager

cc: John Novotny, GE
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