



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

01-0065
SDMS 201298

November 24, 2003

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's August 2003 submittal "*Plant Site 1 Groundwater Management Area NAPL Monitoring Report for Spring 2003*," GE - Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA's) conditional approval of the pre-design investigation activities described in the above-referenced "*Plant Site 1 Groundwater Management Area NAPL Monitoring Report for Spring 2003*" (NAPL Report). The NAPL 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.

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 conditions presented in this letter.

Conditions

1. It appears that the high-flow event in the Housatonic River (2,100 cfs at Coltsville on March 29, 2003) provided the information necessary to evaluate transient groundwater mounding behind the sheetpile containment barriers. The electronic data for Cell G2 which was provided as part of the March and April 2003 Monthly Reports needs to be updated to include the river water elevation once the measuring point is surveyed. Also, the groundwater elevations submitted for well HR-G2-MW-2 in the March and April monthly reports appears to be shifted in time. The peak water elevations in HR-G2-MW-2 do not coincide with the river water and groundwater elevations, as would be expected and as has been the case in earlier high flow events. GE shall submit the updated electronic files for the March 29th high-flow event once the electronic data has been reviewed and the survey data is available.
2. GE proposes to discontinue NAPL monitoring at small diameter wells (e.g., well 95-7) based on the potential that they produce exaggerated NAPL thickness due to surface tension. EPA disagrees with this proposed change for any small diameter well with a measurable thickness of NAPL. Although there may be some surface tension effects, it is difficult to believe that surface tension is responsible for the 6.68 foot thick column of LNAPL measured in well 95-7 during the spring NAPL measurement round. Also, the closest LNAPL monitoring wells (ES2-9 and 5) are over 100 feet away from well 95-7. GE shall retain all small diameter NAPL monitoring wells with measurable NAPL, unless there are other nearby NAPL monitoring wells with similar NAPL thicknesses that can be utilized.
3. A thin layer of LNAPL (0.01 feet thick) was observed in well 72 in East Street Area I. This well is located within 30 feet of two residences. GE must demonstrate that the constituents in the LNAPL do not pose an unacceptable risk to occupants via volatilization and transport into the indoor air of the nearby residences.

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EPA reserves its right to perform additional sampling in the areas subject to the GMA-1 NAPL Monitoring Program 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

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