05-0133

SDMS 223119

GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Courier

March 16, 2005

Mr. James M. DiLorenzo
U.S. Environmental Protection Agency
EPA - New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Re: **GE-Pittsfield/Housatonic River Site**
Groundwater Management Area 1 (GECD310)
Newell Street Area II Groundwater and DNAPL Proposal

Dear Mr. DiLorenzo:

As you are aware, GE recently submitted a report entitled *Final RD/RA Work Plan for Newell Street Area II* (Final Work Plan), prepared by Blasland, Bouck and Lee, Inc. on behalf of GE. The Final Work Plan presented a summary of the pre-design investigation activities performed at the Newell Street Area II RAA, a summary of the PCB and Appendix IX+3 evaluation procedures and results, design information, an implementation plan, a discussion regarding Contractor selection, details regarding post-construction activities, and a section concerning the schedule of construction activities. In summary, proposed removal actions for this RAA are anticipated to include soil removal, backfilling, placement of an engineered barrier, and restoration activities.

As shown on the attached figure, there are numerous groundwater monitoring wells and two active dense non-aqueous phase (DNAPL) recovery systems located within/adjacent to the areas proposed for response actions. Non-aqueous phase liquid (NAPL) occurrence at this site primarily consist of DNAPL, which occurs within a well-defined depression at the top of the till confining layer. The wells in this RAA have been subject to a baseline monitoring program that has been ongoing since Spring 2001. Additionally, many of these wells were installed and monitored several years prior to the beginning of the baseline program. Data from these years of monitoring have established that groundwater flow patterns and NAPL occurrence are generally consistent and stable within the Newell Street Area II RAA.

In an effort to reduce the number of wells penetrating the engineered barrier, GE proposes to abandon certain existing monitoring wells and to modify the DNAPL recovery and collection systems. Attached Table 1 presents a summary of the existing monitoring wells and DNAPL recovery wells within the Newell Street Area II RAA. As indicated on that table, there are 40 existing monitoring wells and six DNAPL recovery wells within the RAA. Of the existing monitoring wells, GE proposes that 22 of them be abandoned. The majority of the wells proposed for abandonment are not currently monitored as part of the ongoing groundwater quality or NAPL monitoring programs within Groundwater Management Area (GMA) 1, although three wells (N2SC-15, N2SC-17, and NS-36) that are part of the current GMA 1 monitoring program are proposed for removal. However, these wells are not subject to groundwater quality monitoring nor are they critical to NAPL monitoring or removal activities. The remaining in-place wells (assuming well abandonment, as proposed) will provide an adequate network to perform long-term monitoring of water quality and NAPL occurrence at the site, while reducing the number of well penetrations through the proposed engineered barrier and associated long-term maintenance considerations. All wells will be abandoned in accordance with the procedures established in Appendix GG of GE's Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP).

With regard to DNAPL recovery, two separate systems currently operate at the site. System 1 consists of wells NS-15, NS-30, and NS-32. These wells are each 2-inches in diameter and the removed DNAPL is pumped to a small collection shed situated at the north side of the former parking lot, at the top of the adjacent Housatonic riverbank. These three wells removed a total of 224 gallons of DNAPL in 2004, with monthly collection volumes ranging from 11 to 26 gallons. System 2 consists of wells N2SC-1I, N2SC-3I, and N2SC-14. Well N2SC-14 has a diameter of 4-inches, while the other System 2 wells are 2-inches in diameter. DNAPL collection volume from System 2 in 2004 was 1,530 gallons, with monthly recoveries ranging from of 30 to 346 gallons. This collection volume represents a significant reduction in DNAPL recovery compared to the amounts collected in 1999 (10,915 gallons) and 2000 (11,846 gallons), when the system first became operational. DNAPL removed from the System 2 wells is piped to collection storage tanks that are housed within an enclosed trailer body, located along the western edge of the existing parking lot, next to well N2SC-1I.

To potentially enhance the long-term recovery efficiency of DNAPL collection operations and reduce the associated facilities, piping, and long-term maintenance, GE is proposing several additional DNAPL-related activities. Initially, GE will separately shut down each collection system and perform DNAPL recovery tests on each individual well within the existing systems. The recovery testing will be performed consistent with the procedures presented in Appendix F of the current FSP/QAPP, latest revision dated

January 9, 2004. In addition to the recovery tests in the System 1 and 2 wells, a DNAPL recovery test will also be conducted in monitoring well N2SC-8. At this location, DNAPL thicknesses of 1.78 to 2.29 feet were measured on six separate occasions in 2004.

Following the review of the results of the DNAPL recovery tests, GE will submit a proposal to upgrade the current recovery systems and DNAPL storage facilities to EPA and MDEP. At this time, it is anticipated that the systems will be modified such that DNAPL will be piped into a single collection facility (i.e., the trailer) and that the small shed currently utilized for System 1 will be removed. GE also anticipates that several of the 2-inch recovery wells will be removed from the automated collection system and be replaced by a lesser number (approximately two or three) 4-inch to 6-inch diameter wells. These larger diameter wells will enable the installation of DNAPL sensing probes that will automatically cycle collection pumps on and off. This equipment upgrade and the larger-size well diameter should improve long-term DNAPL collection efficiency.

Given the anticipated time frame for soil-related Removal Actions at the Newell Street Area II RAA, GE would appreciate a response as early as possible on this proposal. Feel free to contact me at your earliest convenience if you or Weston technical staff have any questions.

Sincerely,

John F. Novotny/gpc

John F. Novotny, P.E.
Manager - Facilities and Brownfields Programs

cc: D. Tagliaferro, EPA
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J. Bieke, Goodwin Procter
J. Ciampa, SPECTRA
R. Nasman, Berkshire Gas
B. Charest, Northeast Utilities Service Co.
C. Nicol, Northeast Utilities Service Co.
C. Dooley, Western Mass. Electric Co.
M. McHugh, Rich, May
J. Porter, Mintz, Levin
R. Cataldo, ENSR
D. Mauro, META
Public Information Repositories
GE Internal Repositories

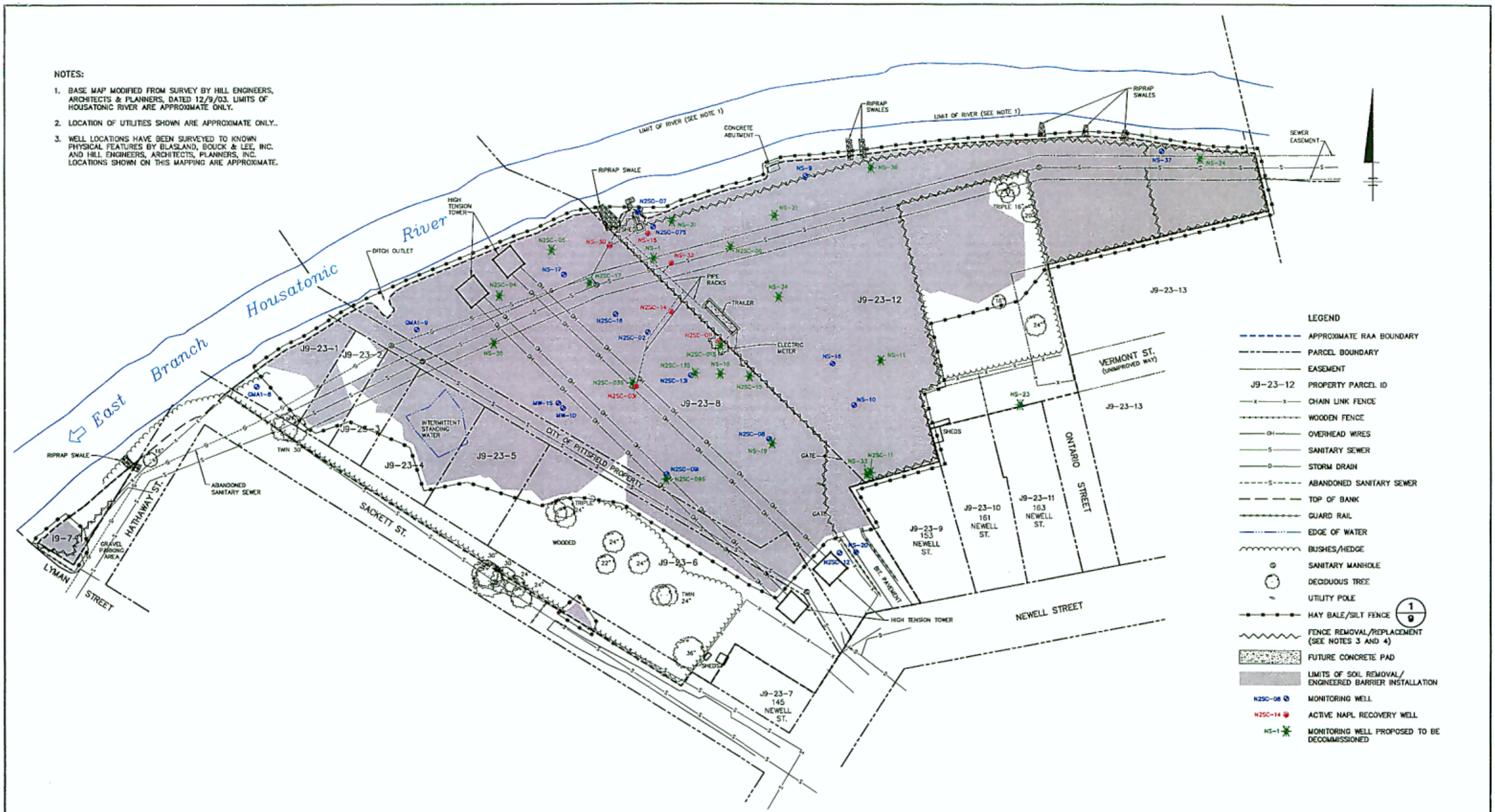
TABLE 1
SUMMARY OF EXISTING MONITORING WELLS AND WELLS PROPOSED FOR DECOMMISSIONING AT NEWELL STREET AREA II

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

WELL ID	PARCEL ID WHERE WELL IS LOCATED	CURRENT MONITORING WELL USAGE	WELL PROPOSED FOR REMOVAL ?
GMA1-8	J9-23-1	GROUNDWATER QUALITY/GROUNDWATER ELEVATION MONITORING	NO
GMA1-9	J9-23-8	GROUNDWATER QUALITY/GROUNDWATER ELEVATION MONITORING	NO
MW-1D	J9-23-8	DNAPL MONITORING	NO
MW-1S	J9-23-8	DNAPL MONITORING	NO
N2SC-01I	J9-23-8	DNAPL RECOVERY	NO
N2SC-01S	J9-23-8	NONE	YES
N2SC-02	J9-23-8	DNAPL MONITORING	NO
N2SC-03I	J9-23-8	DNAPL RECOVERY	NO
N2SC-03S	J9-23-8	NONE	YES
N2SC-04	J9-23-8	NONE	YES
N2SC-05	J9-23-8	NONE	YES
N2SC-06	J9-23-12	NONE	YES
N2SC-07	J9-23-12	DNAPL MONITORING	NO
N2SC-07S	J9-23-12	MONITORING	NO
N2SC-08	J9-23-12	DNAPL MONITORING	NO
N2SC-09I	J9-23-8	DNAPL MONITORING	NO
N2SC-09S	J9-23-8	NONE	YES
N2SC-11	J9-23-12	NONE	YES
N2SC-12	J9-23-8	NONE	NO
N2SC-13I	J9-23-8	DNAPL MONITORING	NO
N2SC-13S	J9-23-8	NONE	YES
N2SC-14	J9-23-8	DNAPL RECOVERY	NO
N2SC-15	J9-23-8	DNAPL MONITORING	YES
N2SC-16	J9-23-8	DNAPL MONITORING	NO
N2SC-17	J9-23-8	DNAPL MONITORING	YES
NS-01	J9-23-12	NONE	YES
NS-09	J9-23-12	GROUNDWATER QUALITY MONITORING	NO
NS-10	J9-23-12	LNAPL MONITORING/GROUNDWATER ELEVATION MONITORING	NO
NS-11	J9-23-12	NONE	YES
NS-15	J9-23-12	DNAPL RECOVERY	NO
NS-16	J9-23-12	LNAPL MONITORING	NO
NS-17	J9-23-8	GROUNDWATER QUALITY/GROUNDWATER ELEVATION MONITORING	NO
NS-18	J9-23-8	NONE	YES
NS-19	J9-23-8	NONE	YES
NS-20	J9-23-8	GROUNDWATER QUALITY/GROUNDWATER ELEVATION MONITORING	NO
NS-21	J9-23-12	NONE	YES
NS-23	J9-23-12	NONE	YES
NS-24	J9-23-12	NONE	YES
NS-30	J9-23-8	DNAPL RECOVERY	NO
NS-31	J9-23-12	NONE	YES
NS-32	J9-23-12	DNAPL RECOVERY	NO
NS-33	J9-23-12	NONE	YES
NS-34	J9-23-12	NONE	YES
NS-35	J9-23-8	NONE	YES
NS-36	J9-23-12	GROUNDWATER ELEVATION MONITORING	YES
NS-37	J9-23-12	GROUNDWATER QUALITY/GROUNDWATER ELEVATION MONITORING	NO

NOTES:

1. BASE MAP MODIFIED FROM SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS, DATED 12/9/03. LIMITS OF HOUSATONIC RIVER ARE APPROXIMATE ONLY.
2. LOCATION OF UTILITIES SHOWN ARE APPROXIMATE ONLY..
3. WELL LOCATIONS HAVE BEEN SURVEYED TO KNOWN PHYSICAL FEATURES BY BLASLAND, BOUCK & LEE, INC. AND HILL ENGINEERS, ARCHITECTS, PLANNERS, INC. LOCATIONS SHOWN ON THIS MAPPING ARE APPROXIMATE.



LEGEND

- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- EASEMENT
- J9-23-12 PROPERTY PARCEL ID
- CHAIN LINK FENCE
- WOODEN FENCE
- OVERHEAD WIRES
- SANITARY SEWER
- STORM DRAIN
- ABANDONED SANITARY SEWER
- TOP OF BANK
- GUARD RAIL
- EDGE OF WATER
- BUSHES/HEDGE
- SANITARY MANHOLE
- DECIDUOUS TREE
- UTILITY POLE
- HAY BALE/SILT FENCE (1/9)
- FENCE REMOVAL/REPLACEMENT (SEE NOTES 3 AND 4)
- FUTURE CONCRETE PAD
- LIMITS OF SOIL REMOVAL/ ENGINEERED BARRIER INSTALLATION
- N25C-08 MONITORING WELL
- N25C-14 ACTIVE NAPL RECOVERY WELL
- NS-1 MONITORING WELL PROPOSED TO BE DECOMMISSIONED

X: 30193X00, X01, X02.DWG
L: ON=*, OFF= *REF, |CONT*, |VEGETATION
P: PAGESET/SYR-DL2B
3/16/05 SYR-BS-LAF SDL RCA
N/30193004/RAA/30193B01.DWG

Graphic Scale
50' 0 50' 100'
1"=50'

THIS DRAWING WAS PREPARED AT THE SCALE INDICATED IN THE TITLE BLOCK. INACCURACIES IN THE STATED SCALE MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED. USE THE GRAPHIC SCALE BAR IN THE TITLE BLOCK TO DETERMINE THE ACTUAL SCALE OF THIS DRAWING.

Date	Revisions	Init

Professional Engineer's Name		
Professional Engineer's No.		
State	Date Signed	
Project Mgr. ACC	Designed by CAA	Drawn by NES

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

GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA II RAA REMEDIAL ACTION

SITE PLAN

TECHNICAL DRAWINGS

BBL Project No. 301.93
Date MARCH 2005

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