



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted Via Overnight Courier*

June 29, 2007

Mr. Richard Fisher  
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 (GEC310)**  
**Groundwater Elevation Assessment for Newell Street Area II Removal Action Area**

Dear Mr. Fisher:

This letter provides the results of the General Electric Company's (GE's) groundwater elevation assessment completed in April 2007 at the Newell Street Area II Removal Action Area (RAA), which is part of Groundwater Management Area 1 (GMA 1) of the GE-Pittsfield/Housatonic River Site in Pittsfield, Massachusetts. This assessment was conducted in accordance with Condition 4 of the United States Environmental Protection Agency's (EPA's) letter dated May 10, 2006 conditionally approving GE's January 30, 2006 *GMA 1 Groundwater Quality Monitoring Interim Report for Fall 2005*. That condition required GE to install four additional monitoring wells around the perimeter of Newell Street Area II and to monitor the elevation from those wells and certain other wells on a quarterly basis for a one year period to define groundwater flow patterns around Newell Street Area II. As discussed in the *Groundwater Management Area 1 NAPL Monitoring Report for Spring 2006*, submitted to EPA on August 30, 2006, GE installed the specified new wells (wells GMA1-25, GMA1-26, GMA1-27, and GMA1-28) in spring 2006 and, in July 2006, GE initiated the monitoring of groundwater elevations. This letter summarizes the groundwater elevation monitoring results that have been collected at these wells since July 2006.

This letter also partially addresses Conditions 3 and 4 of EPA's letter dated May 22, 2007 conditionally approving GE's February 27, 2007 *Plant Site 1 Groundwater Management Area NAPL Monitoring Report for Fall 2006* (Fall 2006 GMA 1 NAPL Report). Condition 3 of that letter referred to anomalous data concerning the elevations of well N2SC-09S and required GE to address those data in an Addendum to the Fall 2006 GMA 1 NAPL Report. If necessary to address the anomalous data, GE was required to inspect the physical condition of the well and resurvey the well. Similarly, Condition 4 noted an anomaly in the elevation data with respect to well NS-10, and specified that, if necessary to address that anomaly, GE should inspect and resurvey the well. As discussed below, GE resurveyed both wells and reports on the results of that resurveying in this letter.

Groundwater elevations from the four new Newell Street Area II wells and nine existing water table wells were generally monitored on a quarterly basis (July 2006, October 2006, January 2007, and April 2007) for the one year period, although certain wells were inaccessible and not monitored during particular events. Two other monitoring wells (NS-9 and NS-16) designated to be included in this assessment were not monitored during this period because they were destroyed during the placement of an engineered barrier over the Newell Street parking lot. Well locations are shown on the attached figures.

As stated above, the Fall 2006 GMA 1 NAPL Report showed discrepancies in the groundwater elevation data for two wells, N2SC-09S and NS-10, compared to other groundwater elevations in the Newell Street Area II RAA. To resolve this discrepancy, wells N2SC-09S and NS-10 were resurveyed in May 2007. It was found that the measuring point elevation for N2SC-09S had changed from 987.84 feet Above Mean Sea Level (AMSL) to 982.75 feet AMSL, while the measuring point elevation for well NS-10 changed from 984.59 feet AMSL to 987.14 feet AMSL. The changes in measuring point elevation are attributed to modifications made to the above-ground section of the casings of these wells during Removal Actions which took place in the Newell Street Area II RAA in 2006.

The groundwater elevations (corrected with the new survey elevations) for the four monitoring events for the water table monitoring wells measured at Newell Street Area II are presented in the attached Table 1. In addition to the Newell Street Area II wells monitored during this assessment, semi-annual monitoring data from well MM-1 from the adjacent Newell Street Area I RAA are also shown in the table, as available monitoring results from that well were utilized in the creation of the groundwater elevation contour maps. As shown in Table 1, the lowest groundwater elevations typically occurred during the summer 2006 monitoring event, while the highest groundwater elevations were generally present in the spring 2007 event. The average change in groundwater elevations between these two events was approximately 2.28 feet.

The seasonal groundwater contour figures for summer 2006, fall 2006, winter 2006/2007, and spring 2007 are shown in Figures 1 through 4, respectively. Figure 2 was updated from a similar figure presented in the Fall 2006 GMA1 NAPL Report to reflect the corrected groundwater elevations for wells N2SC-09S and NS-10. As seen on these figures, despite seasonal variations in groundwater elevations from event to event, the overall groundwater flow pattern at Newell Street Area II consistently displays flow to the north, toward the Housatonic River.

Based on the groundwater data provided herein, no modifications to the current NAPL monitoring or groundwater quality monitoring programs at GMA 1 are needed to address the groundwater flow characteristics that were observed. Therefore, as shown in Table 2, GE proposes to revert to the prior groundwater elevation and NAPL monitoring schedule for the Newell Street Area II wells that were included in this assessment, with the exception that no additional monitoring is proposed at wells NS-9 and NS-16, which no longer exist. Replacement wells are not proposed due to the presence of an engineered barrier at these locations.

Please call Andrew Silber or me if you have any questions regarding this report.

Sincerely,



Richard W. Gates  
Remediation Project Manager

Attachments

cc: D. Tagliaferro, EPA  
T. Conway, EPA (cover letter only)  
H. Inglis, EPA (CD-ROM)  
R. Howell, EPA (cover letter only)  
K.C. Mitkevicius, USACE (CD-ROM)  
L. Palmieri, Weston (2 hard copies and CD-ROM)  
A. Symington, MDEP (cover letter only)  
J. Rothchild, MDEP (cover letter only)  
S. Steenstrup, MDEP (2 copies)  
J. Ruberto, Mayor, City of Pittsfield  
Pittsfield Commissioner of Public Health  
T. Hickey, Director, PEDA  
J. Bernstein, BCK Law  
T. Bowers, Gradient  
N. E. Harper, MA AG  
D. Young, MA EOEA

M. Carroll, GE (cover letter only)  
A. Silfer, GE (CD-ROM)  
R. McLaren, GE (cover letter only)  
J. Nuss, ARCADIS BBL  
J. Bieke, Goodwin Procter  
J. Ciampa, SPECTRA  
J. Porter, Mintz, Levin  
R. Nasman, Berkshire Gas  
M. Booher, Leboeuf, Lamb,  
Greene & MacRae, L.L.P.  
I. Murarka, Ish, Inc.  
K. Hylton, KHES, LLC  
D. Mauro, META  
Public Information Repositories  
GE Internal Repositories

**Tables**

**Table 1**  
**Quarterly Groundwater Elevation Data**  
**Newell Street Area II Water Table Monitoring wells**

**Groundwater Management Area 1**  
**General Electric Company - Pittsfield, Massachusetts**

Well Name				
	Summer 2006 <sup>4</sup>	Fall 2006 <sup>5</sup>	Winter 2006/2007 <sup>6</sup>	Spring 2007 <sup>7</sup>
<b>Newell Street Area II</b>				
GMA1-8	971.91	972.51	972.41	974.09
GMA1-9	972.51	973.10	973.01	974.64
GMA1-25	972.99	974.04	974.53	976.16
GMA1-26	973.53	973.63	977.95	975.51
GMA1-27	974.94	974.97	974.96	977.00
GMA1-28	973.09	973.36	973.58	975.10
MW-1S	974.85	973.35	973.34	975.13
N2SC-07S	NA <sup>8</sup>	972.84	NA <sup>9</sup>	NA <sup>10</sup>
N2SC-09S <sup>11</sup>	972.95	973.50	973.94	975.53
NS-10 <sup>11</sup>	971.31	973.65	974.39	976.14
NS-17	971.86	972.86	972.69	974.43
NS-20	979.34	979.15	NA <sup>9</sup>	980.38
NS-37	NM	972.58	NM	974.14
<b>Newell Street Area I</b>				
MM-1	NM	976.19	NM	977.34

Notes:

1. The elevation shown is in feet above mean sea level.
2. NM - Not Measured (semi-annual monitoring location).
3. NA - Not Available
4. The summer 2006 groundwater elevations were measured on July 11, 2006
5. The fall 2006 groundwater elevations were measured on October 23 and 24, 2006.
6. The winter 2006/2007 groundwater elevations were measured on January 24, 2007.
7. The spring 2007 groundwater elevations were measured on April 23, 2007.
8. During the summer 2006 monitoring round, well N2SC-07S was buried under gravel.
9. During the winter 2007 monitoring round, well N2SC-07S could not be located, well NS-20 was iced over and could not be measured.
10. During the spring 2007 monitoring event, well N2SC-07S was covered by rip/rap.
11. Well elevations for wells N2SC-09S and NS-10 were adjusted based on re-surveying completed in May 2007.

**Table 2**  
**Proposed Groundwater/NAPL Monitoring Program and Removal Criteria**  
**Newell Street Area II Water Table Monitoring wells**

**Groundwater Management Area 1**  
**General Electric Company - Pittsfield, Massachusetts**

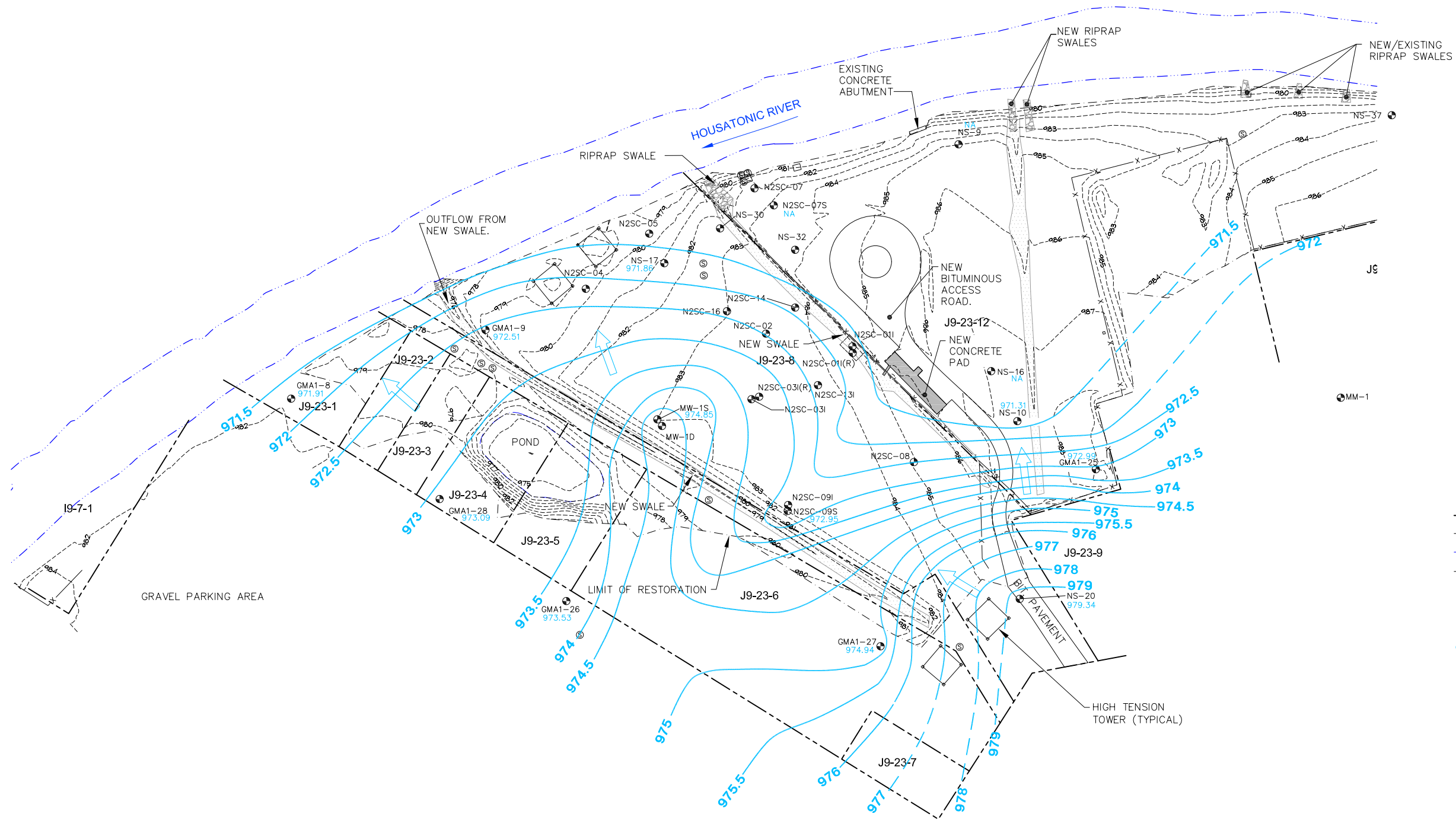
<b>Well ID</b>	<b>Proposed Monitoring Frequency</b>
GMA1-8	Semi-Annual
GMA1-9	Semi-Annual
GMA1-25	Semi-Annual
GMA1-26	Semi-Annual
GMA1-27	Semi-Annual
GMA1-28	Semi-Annual
MW-1S	Quarterly
N2SC-07S	Semi-Annual
N2SC-09S	None
NS-9	None
NS-10	Quarterly
NS-16	None
NS-17	None
NS-20	Semi-Annual
NS-37	Semi-Annual

**Notes:**

1. The listed wells will utilize the proposed Standard Criteria for manual NAPL removal during routine monitoring of 0.25 feet for LNAPL and 0.5 feet for DNAPL.
2. Any NAPL observed during the bailing round conducted prior to the spring and fall semi-annual monitoring events is manually removed.
3. No NAPL is manually removed from any wells during the spring and fall semi-annual monitoring events, provided that NAPL was removed during the bailing round.
4. No NAPL is manually removed from any wells during non-routine data collection activities.

**Figures**

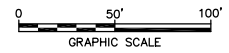
SYR-85-RCB AMS PCB LAYER: ON=\*, OFF=REF\*  
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**LEGEND:**

- PROPERTY LINE
- - - - - LIMIT OF AS-BUILT TOPOGRAPHIC SURVEY
- EDGE OF WATER
- x-x- CHAINLINK FENCE
- ⊙ SEWER MANHOLE
- ⊕ MONITORING WELL
- 974.85 WATER TABLE ELEVATION (FT.)
- 974 WATER TABLE ELEVATION CONTOUR LINE (FT.)
- ← GROUNDWATER FLOW DIRECTION

- NOTES:**
1. BASEMAP INFORMATION OBTAINED FROM A FIGURE CREATED BY HILL ENGINEERS ON 11-7-06 AND LAST REVISED ON 1-2-07 ENTITLED "AS-BUILT SITE PLAN" AT A SCALE OF 1" = 50'. DRAWING FILE NUMBER SRV-1060-001.
  2. HORIZONTAL COORDINATE SYSTEM IS NAD 27 AND ELEVATIONS ARE NGVD29.
  3. GROUNDWATER ELEVATION DATA COLLECTED ON JULY 11, 2006.



GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**GMA 1-NEWELL STREET AREA II**  
**GROUNDWATER ELEVATION**  
**CONTOUR MAP**  
**SUMMER 2006**

FIGURE  
**1**

**ARCADIS** BBL  
infrastructure, environment, facilities







