

**United States Environmental Protection Agency**  
**Region I**  
**One Congress Street, Suite 1100**  
**Boston, MA 02114-2023**

June 28, 1999

Mr. Andrew T. Silfer, P.E.  
General Electric Company  
100 Woodlawn Avenue  
Pittsfield, Massachusetts 01201

**RE: Conditional Approval of GE's April 28, 1999 Submittal Titled *DNAPL Assessment, East Street Area 2 Site, Pittsfield, Massachusetts*, by HSI Geotrans**

EPA approves the above-referenced submittal subject to the following modifications:

**Evaluation of Automated DNAPL Recovery**

GE shall install a six-inch well for the proposed evaluation of an automated DNAPL collection system.

**Manufactured Gas Plant Issues**

The Report states that equipment and/or operations of the former manufactured gas plant appear to be the source of the DNAPL in this study area. Specifically, the Report states the boring X-19 was believed to have been advanced into the former coal tar separator. Since the submission of this Report, GE has performed additional investigations and now believes that boring X-19 was not advanced into the coal-tar separator, but into a different piece of equipment associated with the former manufactured gas plant.

In May 1999, GE located the former coal tar separator, advanced a boring into the separator, and collected samples. The analysis from this boring indicated the presence of primarily BTEX (benzene, toluene, ethyl benzene, and xylenes) and PAHs (polynuclear aromatic hydrocarbons). Total BTEXs detected were approximately 1,000 parts per million (ppm) and total PAHs detected were approximately 5,000 ppm. The analysis of samples collected from boring X-19 detected approximately 200,000 ppm PAHs, which is indicative of concentrated waste or product.

Therefore, GE shall perform the following:

1. Determine the layout of the former manufactured gas plant equipment intercepted by boring X-19. Following delineation, GE shall remove the waste contents of the equipment and either

remove the equipment itself or close it in place.

2. Install a monitoring well downgradient and within 25 feet of boring X-19. Sampling consistent with previous borings installed as part of Source Control activities shall be performed. The well shall be constructed to monitor for the presence of DNAPL. This well shall be included in the NAPL monitoring program for East Street Area II.

### **Schedule**

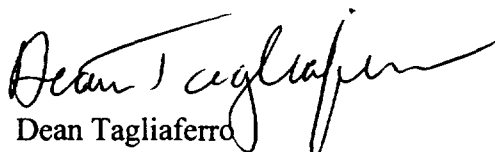
GE shall complete all requirements proposed in the above-referenced Report, as modified by this letter, by September 27, 1999. GE shall also submit a report documenting (1) the results of the evaluation of an automated DNAPL collection system and proposed actions to recover the DNAPL, (2) the results of boring installed in the coal tar separator, (3) the removal/closure of the equipment associated with boring X-19, and, (4) the results of the additional investigative activities required by this letter (e.g., boring logs, sampling data, presences or absence of DNAPL, map identifying well locations and manufactured gas plant equipment, etc.).

### **Additional Work**

EPA may require additional work to be performed, either as part of Source Control activities (e.g., the expansion of an automated DNAPL collection system) or as part of other regulatory mechanisms (e.g., actions to fully delineate the lateral extent of DNAPL, actions to locate additional sources of contamination, additional response actions to address threats posed by soil or groundwater contamination, etc.).

If you have any questions, please contact me at (617) 918-1282.

Sincerely,

  
Dean Tagliaferro  
On-Scene Coordinator

cc: John Ciampa, GE  
Richard Nasman, Berkshire Gas  
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John Kullberg, USACE  
Holly Inglis, EPA ✓  
Mayor Doyle, City of Pittsfield  
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