



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
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01-0658
SDMS 49275

September 23, 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 GE's July 2003 Plant Site 1 Groundwater Management Area Baseline Groundwater Quality Interim Report for Spring 2003, General Electric (GE) Housatonic River Project Site, Pittsfield, Massachusetts.**

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the pre-design investigation activities for the above-referenced *Plant Site 1 Groundwater Management Area Baseline Groundwater Quality Interim Report for Spring 2003* (Report). The 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) and discussions with General Electric (GE) personnel, approves the above-referenced submittal subject to the following conditions:

1. In Subsection 2.3, GE indicates that monitoring well MW-4 in the Lyman Street Area appears subject to surface water infiltration. With 1 ½ Mile Reach construction activities in the vicinity of well MW-4 complete, GE shall install a replacement well mid-way between wells LSSC-8s and B-2 during Fall 2003. GE shall collect groundwater elevation and quality data from the replacement well during Spring and Fall 2004. If the Spring and Fall 2004 groundwater analytical data are consistent with previous data collected from well MW-4, GE shall continue sampling at the replacement well at a frequency of once per year as prescribed for GMA-1 well during the interim groundwater monitoring period.. If the Spring and Fall 2004 groundwater analytical data are inconsistent with previous data collected from well MW-4, GE shall continue sampling at the replacement well twice per year until the GMA-1 Long Term Monitoring Plan is implemented
2. In Subsection 5.3, GE proposes an Interim Groundwater Monitoring Program for GMA 1. EPA generally concurs with GE's proposed program, with the following conditions.
 - EPA review of GE's baseline monitoring data presented in Appendix D indicates that certain wells exhibited a trend of constituent concentrations during the baseline monitoring sampling rounds. Some wells exhibited no discernable trend, a consistently increasing or decreasing trend, or a trend that was elevated during one season with respect to the other season. For the subset of wells that show a potential seasonal trend, it appears that the concentrations of the primary constituents of interest (i.e., VOCs and PCBs) may

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be elevated during the fall relative to the spring. To further evaluate this potential trend, GE shall alternate the proposed interim groundwater monitoring rounds between the spring and fall seasons. To initiate this monitoring schedule, GE shall conduct the next two sampling rounds, the Fall 2003 baseline remainder/mercury sampling and Spring 2004 interim sampling rounds, as proposed. However, the following interim sampling event shall be conducted in Fall 2005. The next interim sampling event will be conducted during Spring 2006, and the alternating schedule will continue until the conclusion of interim sampling activities. GE shall submit interim groundwater monitoring reports following each sampling round in accordance with the reporting schedules previously used for the spring or fall baseline monitoring rounds, as appropriate.

- Due to the reduced frequency of sampling during the interim program, the potential for the discovery of well damage at the time of sampling is increased, and damage to a well that prevents its sampling will result in the loss of an entire year's data. Therefore, GE shall perform well inspections at the wells proposed for use during the interim monitoring program 2 to 3 months prior to each round, in order to allow for the timely repair/replacement of any damaged wells prior to the upcoming interim sampling round.
- It is the goal of the baseline monitoring program to establish baseline conditions in GMA 1. EPA review of the trend of analytical results depicted by GE in Appendix D indicates that 26 of the 66 wells sampled exhibited increasing contaminant concentrations over the entire baseline monitoring period. The monitoring wells where contaminant concentrations have shown the most prominent increasing trend shall be included in the Interim Groundwater Monitoring Program for GMA 1 until such time as it is demonstrated that groundwater contaminant concentrations have stopped increasing for at least two consecutive sampling rounds. This results in an additional six wells for inclusion in the annual Interim Groundwater Monitoring Program for GMA 1 that are not already proposed for inclusion by GE for other reasons. The wells shall be sampled only for the parameters (VOCs, dissolved PCBs, or both) that were found to be increasing during the baseline monitoring period. The wells that require VOC sampling include LSSC-16s in the Lyman Street Area and NS-17 in Newell Street Area II. The wells that require sampling for dissolved PCBs include RF-2 in GEs 30S Complex; ES1-14 in East Street Area 1-North; E2SC-23 in East Street Area 2-South; and LSSC-8s in the Lyman Street Area.
- In the near future, GE will commence Removal Actions at certain RAAs in order to address soil contamination issues. Some of the remedial actions will include excavation of contaminated soils and their replacement with clean fill. It is possible that groundwater flow and groundwater quality may be altered during these activities. For this reason, GE shall be prepared to institute short-term groundwater monitoring using baseline monitoring program wells, as well as additional wells as needed, during Removal Actions within GMA 1.

The above comments relating to the contents of the Spring 2003 report shall be addressed in future groundwater quality interim reports for GMA 1. If there is any conflict between the Performance Standards as described in the Report and as set forth in the Consent Decree and/or Statement of Work for Removal Actions Outside the River (Appendix E to the Consent Decree), the Statement of Work shall control. EPA reserves its right to perform additional sampling in the areas subject to the baseline 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

cc: John Novotny,	GE
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