



01-0764

Corporate Environmental Programs
General Electric Company
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June 15, 2004

Mr. James M. DiLorenzo
GE Facility Project Manager
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 3 (GEC330)
Modifications to Baseline Monitoring Program**

Dear Mr. DiLorenzo:

On April 24, 2001, GE submitted a *Baseline Monitoring Program Proposal for Plant Site 2 Groundwater Management Area* (GMA 3 Baseline Monitoring Proposal), which was conditionally approved by EPA on November 21, 2001. The GMA 3 Baseline Monitoring Proposal summarized the hydrogeologic information available at that time for GMA 3, identified several initial field activities, and proposed groundwater and NAPL monitoring activities for the baseline monitoring period at this GMA. Thereafter, certain modifications were made to the GMA 3 baseline monitoring program as a result of EPA approval conditions and/or findings during field reconnaissance of the selected monitoring locations. Those modifications were documented in an *Addendum to the GMA 3 Baseline Monitoring Proposal*, submitted to EPA on February 20, 2002. That addendum was conditionally approved by EPA on April 18, 2002 and baseline groundwater quality monitoring activities commenced at GMA 3 in spring 2002. However, several of the baseline wells located on non-GE-owned properties within this GMA could not be installed and/or sampled at that time because GE encountered delays in obtaining permission from the property owners to access the locations of new or existing groundwater quality monitoring wells. As a result, only 16 of 37 groundwater quality monitoring wells were sampled as scheduled during the spring 2002 sampling event.

In the *Groundwater Management Area 3 Baseline Groundwater Quality and NAPL Monitoring Interim Report for Spring 2002* (Spring 2002 GMA 3 Baseline Report) GE proposed to omit the fall 2002 groundwater sampling round, if access could not be obtained to the areas of those wells by September 30, 2002, and to conduct a minimum of 2 years of semi-annual baseline groundwater quality sampling beginning with the time that the necessary access was obtained. GE also deferred the spring 2003 and fall 2003 sampling rounds (with EPA approval) because certain property access issues could not be resolved prior to the scheduled performance of those sampling events. As described in the *Groundwater Management Area 3 Interim Groundwater Quality and NAPL Monitoring Report for Fall 2003* (Fall 2003 GMA 3 Interim Report), the final property access issues have been resolved and GE will now conduct a minimum of two years of semi-annual baseline groundwater quality sampling at GMA 3.

GE initiated the spring 2004 groundwater sampling event on April 30, 2004 and has completed the required sampling at most of the GMA 3 locations. However, GE has been unable to sample ten of the required monitoring wells at this GMA. GE discussed these situations with EPA during a technical meeting on May 21, 2004 and EPA provided verbal approval of GE's proposed responses. This letter

contains a summary of the discussions concerning each of the wells that could not be sampled and the approved modifications to the baseline groundwater monitoring program that will be implemented.

GW-3 Baseline Monitoring Wells

Four monitoring wells (i.e., wells 6B, 54B, 82B, and 95B) that were to be utilized during the baseline monitoring program to compare groundwater quality with the MCP Method 1 GW-3 standards were found to be unusable in spring 2004 (well 95B was also scheduled to be monitored for natural attenuation parameters). In each case, significant portions of the well screens had filled with sediment that could not be removed by additional well development. GE will install replacement wells (to be designated as wells 6B-R, 54B-R, 82B-R, and 95B-R) at each of these locations and will utilize the replacement wells as GW-3 monitoring points in the baseline monitoring program and will also utilize well 95B-R in the natural attenuation monitoring program. Each well will be installed with 10-foot screen sections positioned to straddle the water table, or as shallow as possible, where groundwater is very close to the ground surface.

Natural Attenuation Monitoring Wells

Seven monitoring wells (i.e., wells 16C, 16E, 89D, 95B, 95C, 111A, and 114C) that were to be utilized to assess intrinsic and natural processes that could mitigate groundwater impacts (i.e., natural attenuation monitoring wells) were found to be unusable in spring 2004. Well 95B was also scheduled to be monitored as a GW-3 monitoring point and will be replaced, as discussed above. As agreed upon with EPA at the May 21, 2004 technical meeting, GE will replace three additional natural attenuation wells (i.e., wells 16C, 89D, and 111A) that are located in areas of interest relative to the known extent of volatile organic compounds (VOCs). The replacement wells will be designated as wells 16C-R, 89D-R, and 111A-R, respectively. Each well will be installed with 10-foot screen sections installed to approximately the same total depth as the well being replaced. The remaining natural attenuation wells that were found to be unusable (i.e., wells 16E, 95C, and 114C) are installed at depths below the area of interest for the natural attenuation monitoring program. Moreover, other wells that are better-positioned within their respective clusters are being utilized for this monitoring. Therefore, these three wells will be removed from the natural attenuation monitoring program and decommissioned.

Schedule

GE has already replaced well 16C with well 16C-R and will install the remaining six replacement wells this summer, in order to have the new wells in place and developed prior to the fall 2004 baseline groundwater quality monitoring event. The next natural attenuation sampling event is scheduled for spring 2005.

Please contact me if you have any questions or comments.

Sincerely,



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

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