



01-0428

Corporate Environmental Programs
General Electric Company
130 Woodlawn Avenue, Pittsfield, MA 01201

September 28, 2001

SDms 159459

Mr. Bryan Olson
EPA Project Coordinator
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 Areas (GECD300)
Clarification of GW-2 Groundwater Monitoring Protocols**

Dear Mr. Olson:

As you know, General Electric (GE) will be implementing baseline groundwater monitoring programs at five Groundwater Management Areas (GMAs) within the GE-Pittsfield/Housatonic River Site, as discussed in the Consent Decree for this Site and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW), and further described in GMA-specific baseline groundwater monitoring program proposals. In accordance with Attachment H to the SOW, these programs will include the monitoring of certain wells for compliance with the GW-2 groundwater standards specified in the Massachusetts Contingency Plan (MCP), which apply to groundwater that is located within 30 feet of an existing occupied building and is present at an average annual depth of 15 feet or less. As stated in Attachment H, the samples collected from these wells must be analyzed initially for all volatile organic compounds (VOCs) listed in Appendix IX of 40 CFR 264, plus 2-chlorethylvinyl ether. However, since Appendix IX does not specifically list which constituents are categorized as VOCs, GE has recently had discussions with EPA and MDEP to clarify the compounds that will be analyzed for in samples from the GW-2 wells. This letter confirms GE's agreement with EPA and MDEP on this subject.

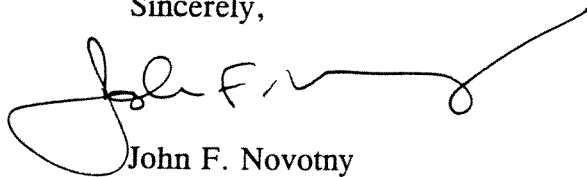
For monitoring wells that will be sampled solely for GW-2 compliance under the approved GMA-specific proposals, GE will initially analyze the collected samples for all constituents that can be quantified using EPA SW-846 Method 8260B. These include not only the compounds listed in Table 2 of GE's approved *Field Sampling Plan/Quality Assurance Project Plan* (FSP/QAPP) as VOCs to be analyzed using Method 8260B, but also several compounds that are categorized in the FSP/QAPP (Table 2) as semi-volatile organic compounds (SVOCs) but which can actually be quantified by Method 8260B. Specifically, GE, EPA, and MDEP have agreed that GE will also include the following five such compounds within the VOC analysis for wells to be sampled only for GW-2 compliance purposes (i.e., where samples for SVOC analysis will not otherwise be collected): m-dichlorobenzene (1-3 DCB), o-dichlorobenzene (1-2 DCB), p-dichlorobenzene (1-4 DCB), naphthalene, and 1,2,4-trichlorobenzene. When these five SVOCs are analyzed by Method 8260B, GE will ensure

that the reported detection limits are less than the applicable GW-2 standards. In addition, in such cases, GE will conduct QA/QC evaluations to validate the resulting analytical data for those constituents in accordance with the FSP/QAPP. To assist in this evaluation, these five SVOCs will be included in the initial and continuing calibration standards, matrix spike/matrix spike duplicates, and the laboratory control standards.

For monitoring wells that will be sampled for evaluation of both GW-2 and GW-3 standards, the analyses will initially include VOC and SVOC analyses, among others. For the samples from these wells, GE will perform the analyses for all SVOCs, including the five specific compounds listed above, using EPA SW-846 Method 8270C, as specified in Tables 1 and 2 of the FSP/QAPP, in order to limit the amount of modifications to the VOC and SVOC analyte lists provided to the laboratory. In reviewing the sampling results from these wells, GE will compare the concentrations detected for all constituents for which GW-2 standards exist to the GW-2 standards. In the future, if GE proposes to discontinue SVOC sampling at certain of these wells for GW-3 monitoring purposes but to retain those wells as GW-2 monitoring wells, the five compounds listed above will be added to the VOC analyte list.

Please call Andy Silber or me if you have any questions regarding this letter or future groundwater monitoring activities.

Sincerely,



John F. Novotny
Manager - Facilities and Brownfields Programs

Cc: M. Nalipinski, EPA
T. Conway, EPA
H. Inglis, EPA
K.C. Mitkevicius, USACE
D. Jamros, Weston
A. Weinberg, MDEP
R. Bell, MDEP
J.L. Cutler, MDEP (2 copies)
D. Gates, GE
S. Keydel, MDEP
S. Steenstrup, MDEP
T. Angus, MDEP
Mayor G. Doyle, City of Pittsfield
Pittsfield Commissioner of Public Health

T. Hickey, Director, PEDDA
J. Bernstein, Bernstein, Cushner & Kimmel
T. Bowers, Gradient
N.E. Harper, MA AG
D. Young, MA EOEA
M. Carroll, GE
A. Silber, GE
R. McLaren, GE
J. Ciampa, SPECTRA
J. Nuss, BBL
J. Bieke, Shea & Gardner
Public Information Repositories
GE Internal Repositories