



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

01-0773
SDMS 211704

May 5, 2004

Mr. Andrew T. Silfer
Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue
Pittsfield, MA 01201

Via Facsimile and U.S. Mail

Re: **Comments on General Electric's 28 January 2004 *Groundwater Management Area 5 Baseline Groundwater Quality Interim Report for Fall 2003*, General Electric/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 described in the above-referenced *Groundwater Management Area 5 Baseline Groundwater Quality Interim Report for Fall 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), approves the above-referenced submittal subject to the following conditions:

1. In Subsection 1.2, GE does not mention the pre-design investigation performed by GE at RAA 15 during Spring and Summer 2003. These soils are a potential source of PCB and Appendix IX+3 constituent contamination in groundwater in the area, and shall be discussed in future reports.
2. In Subsection 2.2, GE discusses groundwater elevation monitoring. The summer 2003 data were collected during two days, 28 and 29 July 2003. In contrast, the Fall 2003 data were collected between 20 and 24 October 2003, during groundwater sampling at each well. Previously, EPA has directed GE, during review of previous baseline monitoring reports, to collect groundwater elevations as close together as possible, and GE has responded by measuring groundwater elevations prior to sampling, in the period of a day or so. This was not done during the Fall 2003 monitoring round, resulting in the groundwater elevation data being collected over a five-day period. In the future, GE shall collect groundwater elevation data during a single day, prior to collection of groundwater samples.
3. In Subsection 3.2.3, GE states that, "PCBs were detected in either the unfiltered or filtered samples at seven of the eight wells." According to subsequent statements, and the analytical results published in Tables 6 and 7, PCBs were detected in six of the eight wells."

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4. In Subsection 4.4, EPA does not fully agree with the statement that, "...concentrations of VOCs and PCBs have remained relatively stable in the GMA 5 wells." In the Fall 2003 sampling round, wells such as GMA5-4 and GMA5-6 had slightly higher PCB levels and wells GMA5-4, GMA5-5 and GMA5-6 represent first-time detections for VOCs, following several rounds of non-detects.
5. In Subsection 5.2, GE proposes an Interim Groundwater Monitoring Program for GMA 5. EPA generally concurs with the scope of the proposed interim monitoring program, subject to the following conditions:
 - The purpose of the Interim Groundwater Monitoring Program is to observe general conditions in each of the five GMAs until the ongoing soil investigation and removal actions are complete and the temporary dam is removed. Upon completion of such activities, a Long-Term Groundwater Monitoring Program will be developed. The information contained in the following bullets will be considered in determining the scope of the Long-term Groundwater Monitoring Program.
 - EPA's review of the baseline results indicates that groundwater levels in GMA 5 are not stable. This is apparently due to the presence of the temporary surface water impoundment (or dam) installed in the nearby portion of the river prior to the Spring and Fall 2003 monitoring events, which comprise the second half of the Baseline Groundwater Monitoring Program. Because of this, EPA recommends that the initial annual round of the Long-Term Groundwater Monitoring Program, to be conducted following removal of the temporary surface water impoundment, include sufficient analytical data collection to compare with existing baseline data. The scope of the Long-Term Groundwater Monitoring Program may then be modified following completion of the initial annual round. This solution is consistent with GE's recommendation in Section 5 to defer decisions regarding long-term monitoring until the completion of soil remediation in RAA 11.
 - EPA does not believe that GE should use the average of the baseline data to determine which wells have concentrations of organic compounds that are approximately 50% or greater than the applicable MCP groundwater standard to determine whether a monitoring well should be included in the Long-Term Groundwater Monitoring Program. Instead, EPA will compare groundwater concentrations of selected organic constituents to their MCP GW-3 standards and consider possible increasing trends. Future annual monitoring reports will discuss data trends.
 - If the temporary dam is not removed and any soil remedial activities are not complete within two years from the date of this approval letter, the scope of the Interim Groundwater Monitoring Program for GMA5 will be reevaluated with the above considerations.

- EPA considers GE's recommendation to collect at least one additional sample for dissolved cyanide analysis from monitoring well GMA5-8 as unnecessary.
6. In the future, GE will commence the Removal Action at RAA 11 in order to address soil contamination issues to the extent necessary to achieve performance standards. 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.
 7. In Appendix C (Historical Groundwater Data), the y-scale of the graphs (concentration) does not clearly depict the range of the data set. Future trending graphs in this and all other monitoring reports for the five GMAs shall provide scales that are commensurate with the representative data set.

The above comments relating to the contents of the Fall 2003 Report shall be addressed by GE in future baseline groundwater quality reports for GMA 5.

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 and/or require additional sampling or response actions, if necessary, pursuant to the Consent Decree.

If you have any questions, please contact me at (617) 918-1247.

Sincerely,



James M. DiLorenzo
GE Facility Project Manager

cc: John Novotny,	GE
Richard Gates,	GE
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