



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1  
1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

01-0571

SDMS 43606

April 17, 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 January 2003 *Groundwater Management Area 5 Baseline Groundwater Quality Interim Report for Fall 2002*, 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 *Groundwater Management Area 5 Baseline Groundwater Quality Interim Report for Fall 2002* (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:

General Conditions

1. In Subsection 3.2, GE references attached groundwater monitoring information for the Former Elm Street Mobil Station site, located immediately upgradient of the southwest corner of Groundwater Management Area (GMA) 5. However, GE does not appear to have incorporated the groundwater monitoring information into its interpretation of groundwater contamination in the vicinity of GMA 5. In the future, GE shall use the most recent available groundwater elevation data reported at the Former Elm Street Mobil Station site to infer groundwater flow direction at the western end of GMA 5. These groundwater data shall include, but not be limited to, groundwater elevations and flow direction. If practicable, EPA or MDEP may provide copies of these submittals to GE, but GE remains responsible for reviewing and extracting pertinent information from the submittals in advance of the submittal deadline for the GMA 5 interim reports. GE shall discuss the significance of the presence of chemical constituents in groundwater samples collected by third parties during the investigation of the Former Elm Street Mobil Station site.

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2. In Subsection 5.3, GE proposes to eliminate the collection of pesticide and herbicide samples. EPA believes it is premature to terminate groundwater sampling for pesticides and herbicides at this time. Therefore, GE shall not eliminate the collection of pesticide and herbicide samples.
3. Certain GE analytical sample results from Fall 2002 show the presence of mercury, which had not been detected at these locations in previous groundwater sampling rounds by either GE or EPA. EPA split samples from some of the same locations in which the GE analysis detected mercury in the Fall 2002 sampling round. The EPA split samples did not detect mercury.

GE shall submit selected groundwater samples collected during the next semi-annual baseline monitoring round from GMA - 1 to separate laboratories for mercury analysis, to assess the potential of laboratory-related impacts to the mercury data. Following completion of the Spring 2003 sampling event, GE shall further evaluate the Fall 2002 mercury detections by GE in light of the analytical data from the other baseline sampling events and the EPA non-detect results from the Fall 2002 sampling. GE shall include a discussion in the subsequent baseline monitoring report presenting the results of that assessment.

4. In Appendix A, EPA has reviewed data included in *Groundwater Sampling Field Logs*. These data indicate that additional care needs to be taken by field crews to follow low-flow sampling methods and to address monitoring equipment problems during future groundwater sampling rounds. GE shall correct problems with field equipment when identified, before proceeding with sampling, in order to ensure the field standard operating procedures (SOPs) are followed and data quality objectives are met. Deviations to the *Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP)* should be presented in subsequent reports. Justification for the deviations should be noted and corrective measures should be proposed, if necessary. In addition, GE shall ensure that the field crews are familiar with the *FSP/QAPP* and that SOPs are followed and field documentation of sampling procedures is accurately recorded. If, during field activities, GE determines that a deviation from the *FSP/QAPP* and/or SOP may be appropriate, they will notify Weston so that EPA and GE can make a mutual determination can be made as to the best approach to resolve the issue.

The above comments relating to the contents of the Fall 2002 report shall be addressed in future baseline groundwater quality interim reports for GMA 5, and comments related to the performance of sampling activities shall be implemented prior to the Spring 2003 quarterly groundwater elevation monitoring round. 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:	Dick Gates,	GE
	Rod McLaren	GE
	James Bieke,	Shea & Gardner
	Jim Nuss,	BBL
	Sue Keydel,	MDEP
	Sue Steenstrup,	MDEP
	Robert Bell,	MDEP
	Alan Weinberg,	MDEP
	Bryan Olson,	US EPA
	Holly Inglis,	US EPA
	Tim Conway,	US EPA
	Rose Howell,	US EPA
	K.C. Mitkevicius,	USACE
	Dawn Jamros,	Weston Solutions, Inc.
	Pittsfield MA Office	US EPA
	Mayor Sara Hathaway,	City of Pittsfield
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