



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

01-0055
SDMS 201042

October 20, 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 General Electric's August 2003 *Pre-Design Investigation Report for the Former Oxbows A & C Removal Action*, GE-Pittsfield/Housatonic River 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 *Pre-Design Investigation Report for the Former Oxbows A & C Removal Action*, (PDI Report) dated August 15, 2003. The PDI 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 2.3, GE discusses modifications to the pre-design sampling activities. GE notes that subsurface refusal prevented GE from advancing soil borings at locations RAA11-E15 and RAA11-I13 to their 15-ft below ground surface (bgs) target depth. The subsurface refusal prevented the collection of soil samples for PCB and Appendix IX+3 analyses from the deeper intervals of each of the soil borings. GE shall use an appropriate drill rig to collect a soil sample for PCB and Appendix IX+3 analyses from the 10 to 15-ft depth interval at location RAA11-E15, after drilling through the concrete obstruction at 8 ft. GE shall offset location RAA11-I13 approximately 40 ft to the north, to the edge of the loam pile, and collect PCB samples from the 6- to 10-ft and 10- to 15 ft depth intervals, and Appendix IX+3 samples from the 10- to 15 ft depth interval.

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2. In Subsection 2.3, GE also discusses other modifications to the pre-design sampling activities. GE notes that subsurface utilities prevented GE from advancing soil borings at locations RAA11-I25 and RAA11-Q11 within 25 ft of 'utility bands' at the site. GE and EPA have previously agreed that only data from within 25 ft of subsurface utilities collected at a maximum interval of 150 ft along the 'utility band' were required to characterize the utility as required by the CD. GE shall collect additional utility characterization, subsurface PCB soil samples as previously proposed in GE Figure 4 of the Addendum to the PDI Work Plan; RAA11-I25A approximately 25 ft south of sample location RAA11-I25, and RAA11-Q11A 20 to 25 ft west of sample location RAA11-Q11.
3. In Subsection 2.4, GE summarizes available soil data. GE incorrectly includes EPA split soil analyses in the table on Page 2-4. EPA split soil samples are quality assurance/quality control samples that do not count toward the sample total for the RAA. This inaccuracy does not significantly affect the sample total for the RAA. In the Supplemental PDI Report, GE shall correct the table on page 2-4 to eliminate EPA splits.
4. In Subsection 2.6.2, GE evaluates data needs at adjacent parcels. Regarding Parcels I8-23-4 and I8-23-5, GE indicates that further PCB sampling will be conducted within the parcels. However, nine of the 12 surface soil samples collected along the southern boundary of the RAA in this area (GE samples RAA11-X5 and RAA11-X8, and ExxonMobil samples SB-415 to SB-421) contain PCBs at concentrations greater than 10 parts per million (ppm), the potential Imminent Hazard reporting concentration under the Massachusetts Contingency Plan (MCP). These samples meet the same criteria as other soil samples identified by GE at the margins of the RAA that lead to further sampling in adjacent parcels. Within 30 days, GE shall propose additional sampling in order to delineate the extent of these elevated soil concentrations along Elm Street.
5. On Page 3-3, in the first complete paragraph, two references to parcel numbers are incorrect. In the second and fourth sentences, Parcel I8-23-3 should be changed to Parcel I8-23-11.
6. GE shall describe in both text and in table foot notes, the differences in nomenclature and depth intervals between the samples collected from the loam pile and those collected from beneath the loam pile, measured from the former ground surface beneath the loam pile. As presented in the PDI Report, the lack of definition could prove confusing to those not familiar with the objectives of the investigation.

GE shall initiate all supplemental fieldwork within 30 days from obtaining approval of the additional sampling along Elm Street. GE shall submit the Supplemental PDI Report to the Agencies no later than six (6) months from the date of this approval letter.

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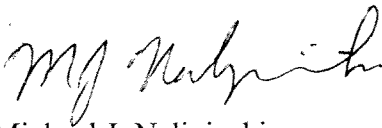
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EPA reserves its right to perform additional sampling in the areas subject to PDI Report and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (617) 918-1268.

Sincerely,



Michael J. Nalipinski
GE Facility Project Manager

cc:

Dick Gates,	GE
James Bieke,	Shea & Gardner
Jim Nuss,	BBL
Sue Steenstrup,	MDEP
Robert Bell,	MDEP
Anna Symington,	MDEP
Bryan Olson,	US EPA
Holly Inglis,	US EPA
John Kilborn,	US EPA
Rose Howell,	US EPA
Dean Tagliaferro,	US EPA
K.C. Mitkevicius,	USACE
Dawn Jamros,	Weston Solutions
Pittsfield MA Office,	US EPA
Mayor Sara Hathaway,	City of Pittsfield
Property Owner	Parcel I8-23-4
Property Owner	Parcel I8-23-5
Property Owner	Parcel I8-23-6/I9-5-1
Property Owner	Parcel I8-23-9
Property Owner	Parcel I8-23-10
Public Information Repositories	