



01-0662

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

SDMS 201119

*Transmitted Via Overnight Delivery*

November 18, 2003

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  
Former Oxbow Areas A and C (GEC410)  
Proposal for Additional Supplemental Pre-Design Soil Sampling**

Dear Mr. Olson:

In August 2003, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a document titled *Pre-Design Investigation Report for the Former Oxbow Areas A and C Removal Action* (PDI Report). The PDI Report included the results of pre-design soil investigations conducted by GE and EPA and provided an assessment regarding the overall adequacy of the pre-design results to support future Removal Design/Removal Action (RD/RA) activities. Based on that assessment, GE proposed in the PDI Report to perform certain supplemental soil investigations and present the results to EPA in a Supplemental PDI report. EPA conditionally approved the PDI Report (and the proposed supplemental sampling) in a letter dated October 20, 2003. The conditional approval letter also required that GE propose additional supplemental sampling near the southwest boundary of the RAA and in the vicinity of the former Elm Street Mobil Site. This letter proposes that additional supplemental sampling.

Review of GE's PDI sampling data, as well as data from previous investigations conducted by others related to the former Elm Street Mobil Site, indicates that certain surface soil samples in this area contain polychlorinated biphenyls (PCBs) at concentrations greater than 2 parts per million (ppm). Therefore, as described below, additional soil sampling is proposed to further assess the presence of PCBs.

**A. Proposed Additional Pre-Design Sampling**

To further assess the presence of PCBs in soils near the southwest boundary of the RAA and the former Elm Street Mobil Site, GE proposes the following additional supplemental sampling for PCBs. The attached Figure 1 shows the portion of Former Oxbow Areas A and C relevant to this proposed sampling. Therefore, the figure shows the new sampling locations proposed in this letter, as well as those supplemental samples proposed in the PDI Report that are located in this same area. Figure 1 does not show the supplemental samples proposed in the PDI Report to be taken from other portions of Former Oxbow Areas A and C.

Pre-design soil results indicate PCB concentrations greater than 2 ppm in surface (0- to 1- foot depth) soil samples collected at the RAA11-X5 and RAA11-X8 locations at the southwest part of Parcel I8-23-6. Therefore, as shown on Figure 1, GE proposes to advance subsurface borings approximately 10 feet south of these locations at RAA11-X5S and RAA11-X8S. These borings will be advanced to a total depth of 15 feet and soil samples will be collected at the depth increments appropriate for commercial/industrial

properties (0- to 1-foot, 1- to 3-feet, 3- to 6-feet, 6- to 10-feet, and 10- to 15-feet). Initially, PCB analysis will be performed for the 0- to 1-foot and 1- to 3-foot soil samples from these borings. Analysis of samples from deeper depth increments in the borings will be conducted (if needed) based the results of the upper depth increments (e.g., if the PCB results for the 1- to 3-foot depth increment are greater than 2 ppm, a sample from the 3- to 6-foot depth increment will then be analyzed and this process will continue in the boring until the depth increment at which PCB results are less than 2 ppm).

Results for surface (0- to 1- foot depth) soil samples collected by others at locations SB-415 through SB-421 at the southern part of the former Elm Street Mobil Site (Parcel I8-23-5) indicate that concentrations of PCBs are greater than 2 ppm in these samples. Therefore, as shown on Figure 1, GE proposes to advance a series of subsurface borings approximately 15 feet south of these locations at RAA11-W1SE and RAA11-X2 through RAA11-X4. Similar to the supplemental samples proposed above, these borings will be advanced to a total depth of 15 feet and soil samples will be collected at depth increments appropriate for commercial/industrial properties. Again, PCB analysis will be performed initially for the 0- to 1-foot and 1- to 3-foot soil samples from these borings. The lower samples will be subject to PCB analysis on an iterative basis, depending on the results of the upper intervals as described above.

All of the supplemental samples will be collected, analyzed, and validated as specified in the approved FSP/QAPP.

#### **B. Future Activities and Schedule**

GE will initiate the supplemental fieldwork for the former Oxbow Areas A and C within 30 days from obtaining approval of the supplemental sampling proposed in this letter. The results of this sampling will be incorporated into the Supplemental PDI Report, which is due to the EPA by April 20, 2004.

Please contact Dick Gates or me with any questions.

Sincerely,



Andrew T. Silfer, P.E.  
GE Project Coordinator

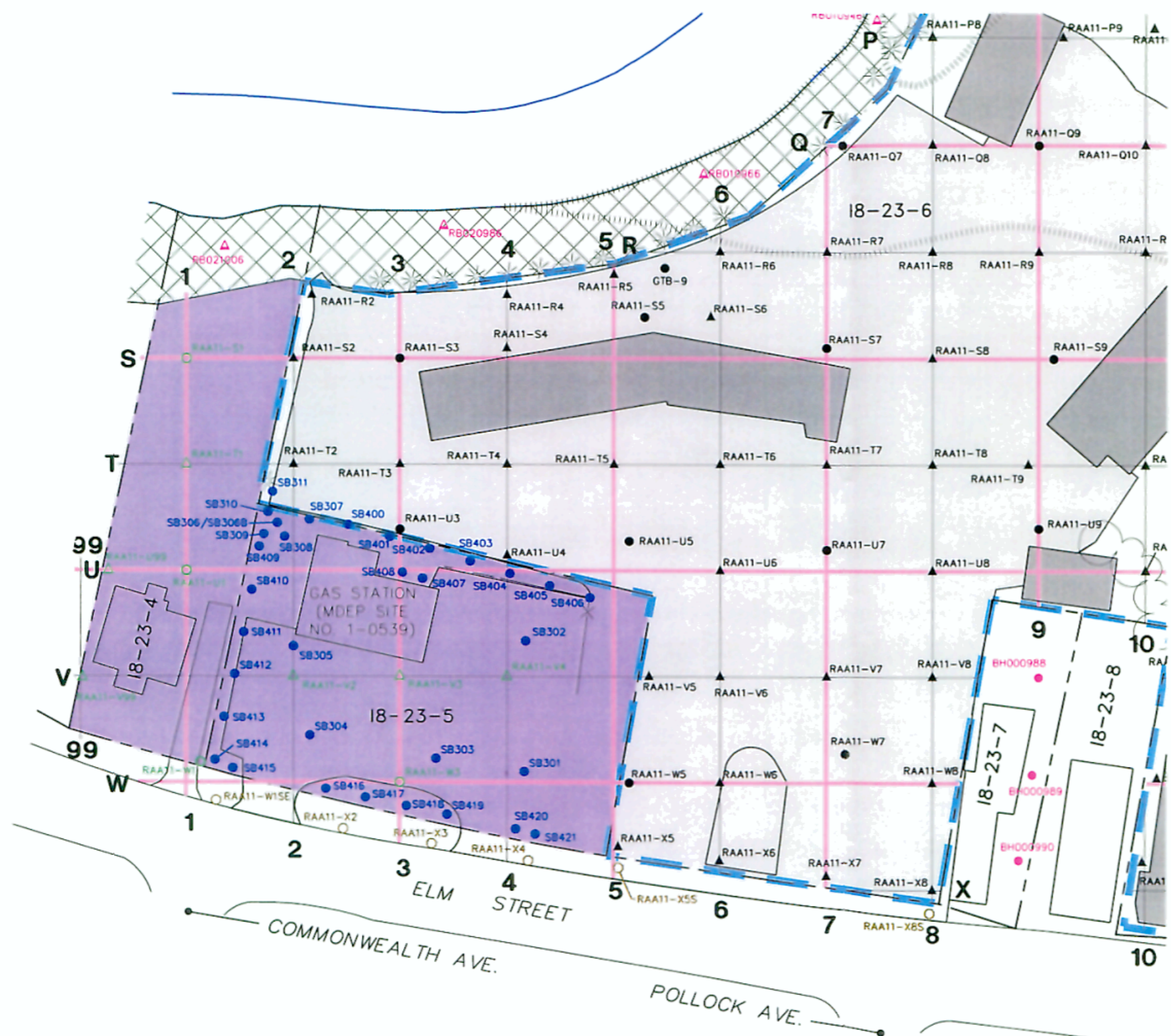
Enclosure

V:\GE\_Pittsfield\_CD\_Former\_Oxbow\_Areas\_A\_and\_C\Agreements and Proposals\78132196.doc

cc: Tim Conway, EPA  
Rose Howell, EPA  
Michael Nalipinski, EPA  
K.C. Mitkevicius, USACE  
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Pittsfield Department of Health  
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Michael Carroll, GE  
Rod McLaren, GE\*  
Richard Gates, GE  
James Nuss, BBL  
James Bieke, Shea & Gardner  
Property Owner – Parcel I8-23-4  
Property Owner – Parcel I8-23-5  
Property Owner – Parcel I8-23-6  
Public Information Repositories  
GE Internal Repository

*\*cover letter only*

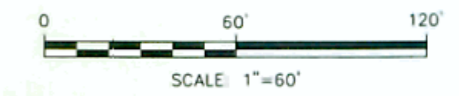


**LEGEND:**

- EDGE OF WATER
- PROPERTY BOUNDARY
- 18-23-6** PROPERTY ID
- FORMER OXBOW/LOW LYING AREA
- APPROXIMATE REMOVAL ACTION AREA BOUNDARY (AS DEFINED IN STATEMENT OF WORK)
- BUILDING
- PAVED AREA
- AREA INCLUDED AS PART OF 1 1/2-MILE REACH REMOVAL ACTION
- 50-FOOT SAMPLING GRID
- 100-FOOT SAMPLING GRID
- AREA SUBJECT TO ADDITIONAL INVESTIGATION
- SURFACE SOIL SAMPLE LOCATION
- SOIL BORING LOCATION
- 1 1/2-MILE BANK SOIL SAMPLES (EPA DATA)
- SOIL BORING LOCATION (EPA DATA AT ADJACENT PROPERTY)
- SAMPLING LOCATION FROM ELM STREET MOBIL INVESTIGATIONS
- PROPOSED SUPPLEMENTAL SURFACE SOIL SAMPLE LOCATION
- PROPOSED SUPPLEMENTAL SOIL BORING SAMPLE LOCATION
- PROPOSED ADDITIONAL SUPPLEMENTAL SOIL BORING SAMPLE LOCATION

**NOTES**

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
2. TAX ASSESSOR'S PARCEL IDENTIFICATION NUMBERS AND BOUNDARY INFORMATION OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE ON AUGUST 22, 2002.
3. PROPERTY USE DESIGNATIONS REFLECT CURRENT AND FORESEEABLE FUTURE USE.



**GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
 FORMER OXBOW AREAS A AND C  
 EXISTING AND PROPOSED  
 SUPPLEMENTAL PCB SOIL  
 SAMPLE LOCATIONS**



FIGURE  
**1**

X: 30131X05.DWG  
 L: ON=\*, OFF=REF\*  
 P: PAGESET/PLT-BL  
 11/18/03 SYR-B5-DMW KMD DMW  
 N/30131001/30131030.DWG