



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
ONE CONGRESS STREET, SUITE 1100  
BOSTON, MA 02114-2023

July 1, 2004

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

Via Facimile and U.S. Mail

Re: Comments on General Electric's May 2004 *Former Oxbows A & C, Supplemental Pre-Design Investigation Report and Additional Sampling Proposal*, 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 for the above-referenced *Former Oxbows A & C, Supplemental Pre-Design Investigation Report and Additional Sampling Proposal*, (PDIASP) dated May 19, 2004. The PDIASP 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 with the following conditions.

1. Regarding additional sampling locations proposed by GE south of Parcel I8-23-5, as the parcels south of Parcel I8-23-5 are residential parcels, the proposed samples should be collected using residential property characterization criteria. GE shall collect five samples spaced 25 feet apart, located across Elm Street from sample location RAA11-X2 and RAA11-X3 and situated south of the paved portion of Elm Street within its southern right-of-way. Two of the five sample locations shall be subsurface sample locations, located 50 ft apart, and sampled in 2-ft increments to the depth  $x$ , where  $x$  represents the depth at which PCBs are not detected. The other three sample locations will be located 50 ft apart and sampled at the 0- to 1-ft depth interval.
2. Regarding the further characterization of non-PCB constituents in certain areas of the RAA where elevated concentrations of Appendix IX+3 constituents have previously been detected, GE shall, in addition to the 0- to -1 foot delineation sampling proposed in the PDIASP for

locations around locations RAA11-C17 and -G15, collect a sample from the 1 - to 3-foot depth increment at location -C17 and submit that sample for analysis of semi-volatile organic compounds.

3. Also regarding the further characterization of certain areas of the RAA where elevated concentrations of Appendix IX+3 constituents have previously been detected, GE shall further evaluate the need for additional Appendix IX+3 sampling at locations RAA11-D26, RAA11-F12, RAA11-F26, RAA11-G25, RAA11-I17, RAA11-Q15, and RAA11-O15 to support RD/RA activities. GE shall present the results of its evaluations of non-PCB Appendix IX+3 constituents at these locations in the Conceptual RD/RA Work Plan for EPA review and approval.
4. It is currently unclear whether elevated lead concentrations noted at locations RAA11-J16 and RAA11-R8 will be addressed by future PCB removals or site-specific risk assessment. GE shall indicate, in the Conceptual RD/RA Work Plan, how the lead concentrations at these locations will be addressed.

GE shall initiate field work within 30 days from the date of this letter, subject to obtaining access from the property owners.

EPA does not approve the schedule for the submission of a letter report and a conceptual RD/RA Work Plan described in the fourth through sixth sentences of the first paragraph of Section VI (Proposed Schedule). Instead, GE shall submit a letter report containing the sampling results from all field work four months after the date of this letter. The letter report shall indicate whether any additional soil sampling is needed, and if so, the letter report shall contain a proposal for such sampling. Whether or not additional sampling is required, GE shall then submit for review and approval the Conceptual RD/RA Work Plan by January 14, 2005.

If there is any conflict between the Performance Standards as described in the Work Plan 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 Consent Decree and Statement of Work shall control. EPA reserves its right to perform additional sampling in the areas subject to PDIASP 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) 918-1240.

Sincerely,

  
William Lovely  
EPA Project Manager

cc:

|                                 |                              |
|---------------------------------|------------------------------|
| Dick Gates,                     | GE                           |
| James Bieke,                    | Shea & Gardner               |
| Jim Nuss,                       | BBL                          |
| Sue Keydel,                     | MDEP                         |
| Sue Steenstrup,                 | MDEP                         |
| Robert Bell,                    | MDEP                         |
| Anna Symington,                 | MDEP                         |
| 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 James Ruberto,            | City of Pittsfield           |
| Property Owner                  | Parcel I8-23-6/I9-5-1/I9-5-2 |
| Property Owner                  | Parcel I8-23-4               |
| Property Owner                  | Parcel I8-23-5               |
| Property Owner                  | Parcel I8-23-9               |
| Property Owner                  | Parcel I8-23-10              |
| Public Information Repositories |                              |