



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

00-0153
SDMS 40201

December 11, 2002

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 May 2002 Pre-Design Investigation Work Plan for the Former Oxbows A & C Removal Action, 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 "*Pre-Design Investigation Work Plan for the Former Oxbows A & C Removal Action*," (PDIWP). The PDIWP 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:

General Conditions

Review of the PDIWP has identified a number of data gaps or inconsistencies that shall be addressed in an PDIWP Addendum.

1. In Subsection 2.4, GE lists sources of available soil analytical results. Table 1 summarizes available PCB analytical results, and Table 2 summarizes available non-PCB analytical results. Review of these portions of the PDIWP indicates that some existing soil analytical results were omitted; specifically, EPA soil analytical results (for the 1½-Mile Reach Removal Action) collected from the drainage ditch located along the southern boundary of the RAA. In addition, a number of soil samples were collected from soil borings in and around the southwestern corner of the RAA in September 2002, as part of the investigation of the former Elm Street Mobil Station, that will be available at the end of December 2002. GE shall include all analytical results, regardless of the source of the analytical data, e.g., Exxon/Mobil contractor, EPA, etc., if such data is applicable and meets data quality criteria, in subsequent submittals, and incorporate any new analytical results into the PDIWP Addendum.
2. Figure 4 depicts what appears to be a right-of-way (ROW) for a proposed extension of Mystic Street southeast of Parcel I9-5-1. Based on experience from other RAAs, it is possible that the southeastern boundary of Parcel I9-5-1 (which defines the boundary of the RAA) extends to the centerline of the ROW. GE shall extend the sampling of Parcel I9-5-1 to the centerline of the ROW. Similarly, GE shall install a boring into the mid point of the Day Street paper extension.

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3. In Table 3, page 4, GE proposes to use data from sample location A-1 to characterize all depth intervals for PCBs. Considering that data for this sample is old and that sample location A-1 is located almost exactly 50 feet from the grid location it is being proposed to represent, GE shall advance a new deep boring at location RAA11-M11.
4. In Subsections 4.4.1 and 4.4.2 of the Work Plan, GE proposes to use the current surface of the loam pile located on former Oxbow A to determine sampling depths. Instead, GE shall use the ground surface beneath the loam pile as the zero elevation to initiate the respective soil sampling depths. GE shall revise Tables 1 and 2 to identify the loam pile samples collected by Weston for EPA as eliminated, and revise Figures 3 and 4, and the appropriate text, accordingly. Additionally, GE should consider augmenting WESTON's samples from the 'loam' pile in order to facilitate characterization of this material.
5. Also in Subsections 4.4.1 and 4.4.2 of the Work Plan, GE shall use the original grade of the temporary access roads to determine sample interval depths. This grade can be easily determined by GE samplers in the field, as landscape fabric was laid down to be used as an indicator of the original grade prior to temporary access road construction.
6. Subsection 4.4.1 includes GE's plans to characterize PCB concentrations surrounding utility lines subject to emergency repairs. GE shall graphically present the locations of all utilities, as well as sampling locations (including depths), necessary to comply with the conditions of the CD and SOW in the Addendum to the PDIWP. According to the property owner there are some high voltage electrical lines which are not represented on the figures.

Further, GE shall shift proposed soil boring location RAA11-Q11 30 ft to the west-northwest to fill the greater than 150-ft sample interval in the proposed characterization of the utility trench in this area.

GE shall confirm the depth of the City 48-inch sewer line and revise the PCB sampling strategy to address the actual depth of the sewer line. These changes may affect the sample depths at the following locations: RAA11-S5, -S11, -U5, -U7, -U9, and -W5.

7. In Subsection 4.4, GE shall propose a percentage (e.g., 20%) of Appendix IX samples to be analyzed for pesticides and herbicides in order to adequately characterize this RAA.
8. In Subsection 4.5, GE outlines soil sampling and analytical procedures. GE shall add details regarding how refusal on concrete contained within the top 15 feet of soil in the RAA will be dealt with, with respect to ensuring that subsurface soils are adequately characterized.
9. GE shall revise the proposed depth intervals of the proposed subsurface Appendix IX+3 samples listed below, as follows:

GE Proposed Sample Location/Depth Interval	EPA Required Sample Location/Depth Interval
RAA11-G23/1 to 3 ft bgs	RAA11-G21/6 to 10 ft bgs
RAA11-G13/1 to 3 ft bgs	RAA11-I13/6 to 10 ft bgs
RAA11-M15/1 to 3 ft bgs	RAA11-M17/6 to 10 ft bgs

RAA11-E25/3 to 6 ft bgs	RAA11-C21/10 to 15 ft bgs
RAA11-E18/3 to 6 ft bgs	RAA11-D17/10 to 15 ft bgs
RAA11-G23/3 to 6 ft bgs	RAA11-G25/10 to 15 ft bgs
RAA11-M15/3 to 6 ft bgs	RAA11-M17/10 to 15 ft bgs

In addition, GE shall make the following modifications to the proposed non-PCB sampling strategy:

1- to 3-ft depth interval: GE shall substitute a sample from location RAA11-D17 or -E18 for the sample proposed from location RAA11-E17.

6- to 10-ft depth interval: GE shall substitute a sample from location RAA11-C21 or -E25 for the sample proposed from location RAA11-C25. In addition, GE shall propose an additional sample from the southwest portion of the RAA, collected from location RAA11-U7.

10- to 15-ft depth interval: GE shall substitute a sample from location RAA11-Q13 for the sample proposed from location RAA11-O13.

10. The owner of parcel I 8-23-6 also owns adjacent parcels I 8-23-7 and I 9-5-2. Parcel I 9-5-2 is located between Ashley and Day Streets directly south the Oxbow C. GE shall consider sampling these parcels in accordance with the SOW sampling requirements because these properties are owned by the major land owner of the RAA.
11. GE shall move soil boring RAA11-Q17 approximately 35 feet northeast to the corner of parcel I8-23-6 and parcel I8-23-22.

Errata

GE shall correct the following errors noted in the PDIWP.

1. In Subsection 2.4 of the Work Plan, GE identifies the authors of the July 1991 *Phase II Comprehensive Site Investigation* as Groundwater and Environmental Services, Inc. The report was produced by Groundwater Technology, Inc.
2. In Subsection 4.4.1 of the Work Plan, GE indicates that the approximate locations of utility lines are shown on Figures 3 and 4. The approximate locations of utility lines are shown only on Figure 4.
3. In Table 1, "Data Source" column, the note reference shall be changed from the listed "9" to "11."
4. GE shall revise Tables 1 and 3 to include EPA's surficial soil data which was collected prior to the construction of the WWTP pad.
5. In the third column of Table 3, page 3, the sample for the 0- to 1-foot depth increment for grid location H17 needs to be moved from the "existing" to the "proposed" row.
6. In the notes at the bottom of Page 7 of Table 1, the dates for the EPA samples should be included under note 11.E.
7. For consistency in Table 4, entries for grid nodes J12, J13, and L11 should be deleted, as no additional sampling is proposed for either PCBs or non-PCB constituents at these locations.

8. Table 1, Page 6 contains sample RB020946. This sample is not shown on Figure 3 or 4, although a sample RB010946 is included in Figures 3 and 4. GE shall correct the typographic error in Table 1.

GE shall include the responses to the above comments in an Addendum to the PDIWP, to be submitted 45 days following DEP's receipt of the Mobil/Exxon report, but no later than March 1st 2003. GE shall initiate field work within 30 days after approval of the Addendum, subject to obtaining access from the property owners. GE shall submit the Pre-Design Investigation Report to the Agencies no later than five (5) months after approval of the Addendum.

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 PDIWP 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 Keydel, MDEP
Sue Steenstrup, MDEP
Robert Bell, MDEP
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