



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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BOSTON, MA 02114-2023

SDMS  
213228

August 26, 2004

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

Via Electronic and U.S. Mail

Re: Approval of General Electric's June 2004 *Former Oxbow Areas J and K, Supplemental Pre-Design Investigation Report and Additional Sampling Proposal*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Former Oxbow Areas J and K, Supplemental Pre-Design Investigation Report and Additional Sampling Proposal*, (PDI Report) dated June 28, 2004. 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 which are presented below.

1. Section 1 states that subsurface obstructions prevented the collection of samples from the 10-15- foot depth increment at sampling locations RAA15-C5, RAA15-C11E, and YB-1. The report further states that in cases of drilling refusal, at least three attempts were made to penetrate the obstructions using a tractor- and truck-mounted drill rig and hollow-stem augers, at the same and nearby locations. However, based on discussions with GE, EPA understands that hollow-stem augers were not used at the above locations where refusal was met during the supplemental sampling, but had previously used at adjacent or nearby locations during the initial sampling round. GE shall ensure that future sampling events include the use of hollow-stem augers and an appropriately sized drill rig when obstructions are encountered.
2. Section 1 also states that none of the exceptions to the sampling program significantly affects the overall intended use of the proposed samples. However, the report does not

include an explanation to support this statement. EPA notes that GE's *Remedial Evaluations and Proposal for Supplemental Pre-Design Investigations* dated January 28, 2004, proposed a sample from the 10-to 15-foot depth increment at location RAA15-C5 for the purpose of characterizing Appendix IX+3 constituents on parcel K10-11-1. GE shall clarify in the letter report regarding the supplemental sampling how exceptions, such as the one on parcel K10-11-1, did not significantly affect the overall intended use of the proposed samples.

3. In Section 3, GE proposes additional supplemental sampling to delineate the horizontal extent of polycyclic aromatic hydrocarbons (PAHs) around certain PDI sample locations. EPA recommends that GE conduct the following sampling for Appendix IX+3 semi-volatile organic constituents (SVOCs) to delineate PAHs in the vicinity of RAA15-E8: (1) collect a soil sample from the 1- to 3-foot depth interval at a new boring, RAA15-E8NENE, to be located approximately 20 feet north-northeast of supplemental boring RAA15-E8NE; and (2) move the location of proposed soil sample RAA15-NWW (1- to 3-foot depth interval) approximately 20 feet northeast of the proposed location and approximately 30 feet northwest of RAA15-E8NW, and re-designate that sample as RAA15-E8NWNW. EPA also recommends that GE collect two additional Appendix IX+3 SVOC soil samples to delineate the extent of PAHs in the vicinity of RAA15-E7: from the 0- to 1-ft and 1- to 3-ft depth intervals at location RAA15-F7.
4. EPA requests that GE include in subsequent submittals a column on the Appendix IX +3 tables listing the applicable Region IX Preliminary Remediation Goals (PRGs) for each Appendix IX+3 constituent and highlight boxes and/or numbers within the table where the analytical results exceed the applicable PRG.

GE shall initiate supplemental fieldwork within 30 days from the date of this letter, subject to obtaining access from the property owners. GE shall submit the letter report for the supplemental sampling to the Agencies no later than three (3) months from the date of this approval letter.

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) 918-1240.

Sincerely,



William P. Lovely, Jr.  
GE Facility Project Manager

cc:

Dick Gates,	GE
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