

06-0199

SDMS 248184

GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted Via Electronic Mail and Overnight Courier*

March 27, 2006

Mr. William P. Lovely, Jr.  
USEPA – New England  
One Congress Street, Suite 1100 (MC HBO)  
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
Former Oxbow Areas J and K (GEC420)  
Additional Supplemental Sampling Proposal**

Dear Mr. Lovely:

On March 22, 2006, the General Electric Company (GE) submitted the above referenced document to the United States Environmental Protection Agency (EPA). Upon review of that document, it was determined that the sample depth increments associated with the proposed locations described on page 2 of the proposal were inadvertently switched between sampling locations so that they were not consistent with the depth increments at which polychlorinated biphenyls (PCBs) were detected above 2 parts per million (ppm). As such, the above referenced document has been corrected and is attached hereto.

Please call me at (413) 448-5909 if you have any questions.

Sincerely,

*Richard W. Gates / RWG*

Richard W. Gates  
Remediation Project Manager

Enclosure

V:\GE\_Pittsfield\_CD\_Former\_Oxbow\_Areas\_J\_and\_K\Agreements and Proposals\14561832.doc

cc: Dean Tagliaferro, EPA  
Tim Conway, EPA  
John Kilborn, EPA  
Holly Inglis, EPA  
Rose Howell, EPA  
Linda Palmieri, Weston  
K.C. Mitkevicius, USACE  
Susan Steenstrup, MDEP (2 copies)  
Anna Symington, MDEP  
Robert Bell, MDEP  
Thomas Angus, MDEP  
Nancy E. Harper, MA AG  
Dale Young, MA EOE

Mayor James Ruberto, City of Pittsfield  
Michael Carroll, GE  
Andrew Silber, GE  
Rod McLaren, GE  
James Nuss, BBL  
James Bieke, Goodwin Procter LLP  
Property Owner - Parcel K10-11-5  
Property Owner - Parcel K10-10-2  
Property Owner - Parcel K10-10-3  
Richard Drennan, Esq.  
Emil George, Esq.  
Public Information Repositories  
GE Internal Repository



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**Re: GE-Pittsfield/Housatonic River Site  
Former Oxbow Areas J and K (GECD420)  
Additional Supplemental Sampling Proposal**

Dear Mr. Lovely:

On November 2, 2005, the General Electric Company (GE) submitted to the United States Environmental Protection Agency (EPA) a *Supplemental Sampling Plan for Former Oxbow Areas J and K* (Supplemental Sampling Plan). In that document, GE proposed additional sampling for certain non-residential properties at the Former Oxbow Areas J and K Removal Action Area (RAA) to support evaluations concerning the possible achievement of Performance Standards applicable to residential properties within the Former Oxbow Areas. Specifically, GE proposed additional sampling at six properties (K10-13-1, K10-12-1, K10-11-5, K10-10-3, K10-10-4, and K10-10-33) for polychlorinated biphenyls (PCBs) on the pre-design sampling grid that is required for residential properties under the *Statement of Work for Removal Actions Outside the River* (SOW). GE also proposed supplemental sampling for select non-PCB constituents listed in Appendix IX of 40 CFR Part 264 (excluding pesticides and herbicides) plus three additional constituents – benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine at two properties (K10-13-1, and K10-12-1). EPA provided conditional approval of that Supplemental Sampling Plan in a letter to GE dated January 17, 2006.

Between January 23 and February 10, 2006, GE performed sampling activities in accordance with the Supplemental Sampling Plan and EPA's January 17, 2006 conditional approval letter. Since that time, as part of its review of the data, GE has evaluated the results to assess whether PCBs were detected above 2 parts per million (ppm) in sample locations along the RAA boundary.

That review identified two locations within Parcel K10-11-5 where PCBs were detected above 2 ppm along the RAA boundary. At locations RAA15-A27.5 and RAA15-CD27.5, PCBs were detected in the 0- to 1-foot depth increment at concentrations of 33 ppm and 3.5 ppm, respectively. These locations, however, are adjacent to the Commercial Street Area that is currently being investigated by GE under an Administrative Consent Order ("ACO") with the Massachusetts Department of Environmental Protection.

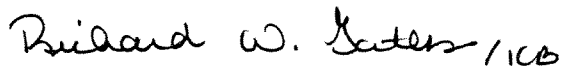
In addition, GE's review identified three samples collected within Parcel K10-10-3 that exceed 2 ppm for PCBs and are located near the RAA boundary. Specifically, at location RAA15-L5, PCBs were detected at a concentration of 4.1 ppm in the 1- to 3-foot depth increment, and at location RAA15-L8, PCBs were detected at concentrations of 4.7 ppm and 6.4 ppm in the 3- to 6-foot and 6- to 10-foot depth increments, respectively. Location RAA15-L5 is adjacent to Parcel K10-10-2, which is neither part of the RAA nor being addressed under the ACO. Location RAA15-L8 is adjacent to the Parkside Avenue Right-of-Way. Therefore, GE proposes additional PCB sampling with respect to these two locations.

As shown on Figure 1, GE proposes to collect additional PCB samples from three locations. First, based on the elevated PCB concentrations detected in the 1- to 3-foot depth increment at sample location RAA15-L5 near the south-eastern boundary of the RAA, GE proposes to advance borings on adjacent Parcel K10-10-2 at locations K10-10-2-SB-1 and K10-10-2-SB-2. At these locations, GE proposes to collect samples for PCB analysis from the 1- to 3-foot depth increment. Second, to delineate the extent of the elevated PCB concentration detected at location RAA15-L8 near the southern boundary of the RAA, GE proposes to advance an additional soil boring on Parcel K10-10-3 at location RAA11-L8S, approximately 3 feet south of RAA15-L8. At this boring, GE proposes to collect a sample for PCB analysis from the 3- to 6-foot and 6- to 10-foot depth increments. Based on the results from these samples, GE will evaluate whether additional sampling for PCBs or other constituents is necessary, and will provide the results of that evaluation, along with a proposal for such sampling if warranted. In addition, once the extent of PCBs on Parcel K10-10-2 is determined, GE will make a proposal as to whether the boundary of the RAA should be extended onto this Parcel.

Following receipt of EPA approval of this letter and a signed access agreement from the owner of Parcel K10-10-2, GE will conduct the proposed PCB sampling described above as soon as possible. Then, if possible, GE will incorporate this new data into the Addendum that is currently due on April 17, 2006. If this schedule cannot be met due to the timing of receipt of access or other factors, GE will discuss the due date of the Addendum with the agencies.

Please call me if you have any questions or comments regarding this proposal.

Sincerely,



Richard W. Gates  
Remediation Project Manager

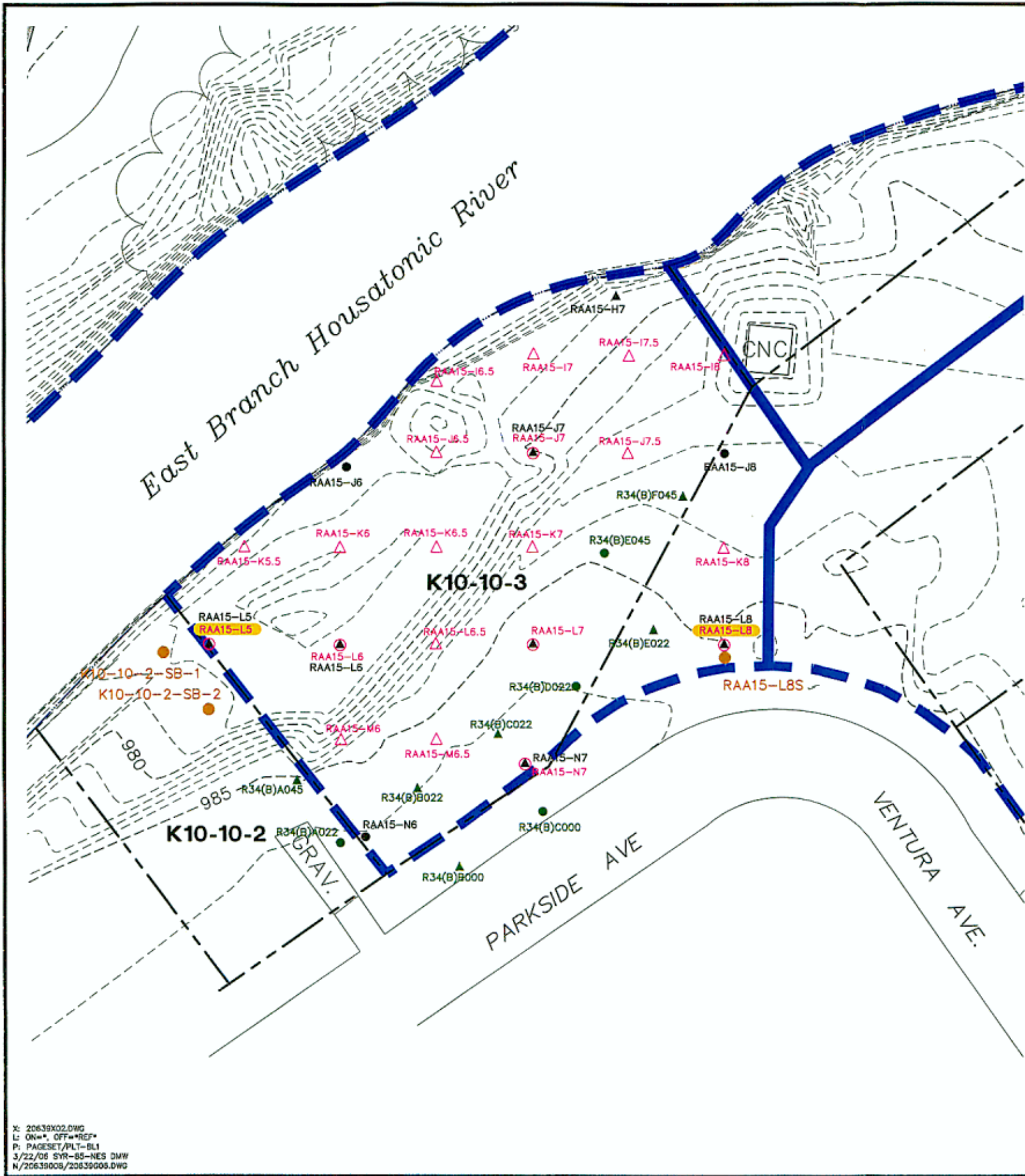
Attachments

V:\GE\_Pittsfield\_CD\_Former\_Oxbow\_Areas\_J\_and\_K\Agreements and Proposals\14661832.doc

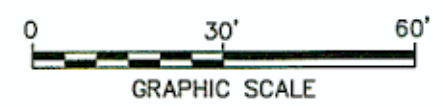
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\* without attachments



- LEGEND**
- APPROXIMATE REMOVAL ACTION AREA BOUNDARY
  - RD/RA AVERAGING AREA BOUNDARY
  - PROPERTY LINE
  - K10-10-3** PROPERTY ID
  - WESTERN MASS. ELECTRIC CO. EASEMENT
  - SEWER EASEMENT
  - INDEX ELEVATION CONTOUR
  - INTERMEDIATE ELEVATION CONTOUR
  - ▲ FP-1 EXISTING SURFACE SOIL SAMPLE LOCATION
  - YB-3 EXISTING SOIL BORING LOCATION
  - ▲ R34(B)C022 EXISTING EPA SURFACE SOIL SAMPLE LOCATION
  - R34(B)C000 EXISTING EPA SOIL BORING LOCATION
  - ▲ RAA15-K7 SUPPLEMENTAL SURFACE SOIL SAMPLE LOCATION
  - RAA15-L7 SUPPLEMENTAL SOIL BORING LOCATION
  - PROPOSED SOIL BORING LOCATION
  - LOCATION WITH A PCB CONCENTRATION GREATER THAN 2 ppm (ADJACENT TO RAA BOUNDARY)



- GENERAL NOTES:**
1. BASE MAP MODIFIED FROM SURVEY DRAWINGS NO. GE-1080-1 (6/25/04) AND GE-1080-3 (11/18/04) BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, INC. AND FROM PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1990.
  2. EASEMENTS AND PROPERTY LINES DIGITIZED FROM COPIES OF CITY OF PITTSFIELD TAX ASSESSORS MAPS AND ARE APPROXIMATE.
  3. FORMER RIVER CHANNEL AND OXBOW/LOW-LYING AREAS DELINEATED USING THE CITY OF PITTSFIELD'S RECHANNELIZATION MAPPING, 1940.
  4. UTILITY LOCATIONS ARE APPROXIMATE, AND ALL UTILITIES MAY NOT BE SHOWN.
  5. SAMPLE LOCATIONS WERE SURVEYED BY BLASLAND, BOUCK & LEE, INC. OR HILL ENGINEERS, ARCHITECTS AND PLANNERS. HISTORICAL LOCATIONS ARE APPROXIMATE.

GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
**FORMER OXBOW AREAS J AND K**

**EXISTING AND PROPOSED PCB SOIL  
SAMPLE LOCATIONS - PARCEL K10-10-3**




FIGURE  
**1**

X: 20639X02.DWG  
L: ON\* OFF\*REF\*  
P: PAGESET/PLT-BL1  
3/22/08 SYR-85-NES DMW  
N: 20639X08/20639X08.DWG