



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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01-0642
SDMS 49288

September 29, 2003

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 11 July 2003 *Pre-Design Investigation Report for the Former Oxbow Areas J and K Removal Action*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the pre-design investigation activities described in the above-referenced *Pre-Design Investigation Report for the Former Oxbow Areas J and K Removal Action* (PDI Report). 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:

1. In Subsection 2.3, GE discusses modifications to the pre-design sampling activities. GE notes that subsurface refusal prevented GE from advancing soil borings at locations RAA15-A11, RAA15-C6 and RAA15-C11 to their 15-ft below ground surface (bgs) target depth (refusal was at approximately 3 ft bgs at location A11, and 10 ft bgs at the remaining locations). The subsurface refusal prevented the collection of soil samples for PCB analysis from the deeper intervals of each of the soil borings. Data for only one depth interval was lost for locations RAA15-C6 and RAA15-C11. As recovery would likely be poor from the depth interval due to the obstruction, there is no reason for GE to attempt to use a more powerful drill rig to collect a soil sample from the 10 to 15-ft depth interval at these locations. However, for the location at or near RAA15-A11, additional PCB data are necessary for depth intervals below 3 ft bgs, since 12 ft of lost subsurface PCB data (comprising three depth intervals) are at stake. EPA has noted that PCB analytical results from the 0 to 4 and 4 to 8-ft depth intervals for existing samples from nearby location YB-1 show relatively low concentrations of PCBs. However, since the YB-1 data do not meet data quality objectives (DQOs), it cannot be used to characterize the RAA15-A11 location. In these circumstances, since GE has already attempted to advance a boring at location RAA15-A11 itself using a truck-mounted drill rig and auger methods, GE shall advance a new boring at existing location YB-1, approximately 5 ft northwest of RAA15-A11, and collect samples from that boring at the 3- to 6-ft, 6- to 10-ft, and 10- to 15-ft depth intervals for PCB analyses.

2. In Subsection 2.3, GE also notes that subsurface refusal prevented GE from advancing soil borings at locations RAA15-C6 and RAA15-C11 to their 15-ft bgs target depth (refusal was at approximately 10 ft bgs at each location). However, GE does not further note that the subsurface refusal prevented the collection of soil samples for Appendix IX+3 analyses from each of the soil borings. The Appendix IX+3 soil samples proposed for collection from these borings were not replaced by samples from other locations within their respective averaging areas. In its next submittal (an evaluation of data needs) as described in Subsection 3.3 of the PDI Report and referenced at the end of this letter, GE shall propose to collect replacement Appendix IX+3 samples for those lost Appendix IX+3 data. These replacement samples shall be collected at nearby locations, considering the need for Appendix IX+3 data at the relevant averaging areas.
3. In Subsection 2.3, GE discusses data quality for the pre-design investigation analytical results. EPA's review of the reported detection limits for Appendix IX+3 analytical results for the RAA found 30 semi-volatile organic compound (SVOC) analyses with detection limits that were greater than twice the Industrial Preliminary Remediation Goals (PRGs) for commonly detected substances with relatively low PRGs, such as benzo(a)pyrene and dibenzo(a,h)anthracene. In 25 of the 30 cases, the substances with the relatively low PRGs were still quantified by the analytical results (at elevated concentrations), resulting in no consequence. However, for the five remaining SVOC analyses, samples RAA15-B15 (0-1), RAA15-C6 (0-1), RAA15-E6 (6-10), RAA15-G4 (3-6) and RAA15-G20 (10-15), the elevated detection limits resulted in the detection of no SVOCs with relatively low PRGs, or no other SVOCs at all. GE shall include in its submittal described in Subsection 3.3 of the PDI Report and referenced at the end of this letter an evaluation of the need for additional SVOC soil sampling related to this data issue (that is, the elevated detection limits) and, if needed, shall propose such supplemental sampling.
4. In addition to the locations of the five remaining samples with high detection limits listed in Comment 3, above, GE shall evaluate the need for additional sampling to delineate the vertical and lateral extent of polycyclic aromatic hydrocarbon contamination at and around the following locations: RAA15-A19, RAA15-B11, RAA15-C11, RAA15-D8, RAA15-E5, RAA15-E7, RAA15-E8, and RAA15-E11. The results of this evaluation - and, if warranted, a proposal for such additional sampling - shall be presented in GE's next submittal, as described in Subsection 3.3 of the PDI Report and referenced at the end of this letter.

GE shall provide a proposal for supplemental soil sampling, which includes the sampling requirements listed above in this letter and after conducting evaluations regarding EREs, recreational vs. commercial/industrial, and preliminary PCB/Appendix IX+3 averaging (as discussed in Section 3.3 of the July 2003 PDI report) within four months from the date of this letter. GE's submittal shall include a schedule for completing such sampling. The Conceptual RD/RA Work Plan for this RAA shall be submitted by GE to EPA within 9 months of the date of this letter..

If there is any conflict between the Performance Standards as described in the Report 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 Statement of Work shall control. EPA reserves its right to perform additional sampling in the areas subject to Proposal and/or require additional sampling or response actions, if necessary, pursuant to the Consent Decree.

If you have any questions, please contact me at (617) 918-1268.

Sincerely,



Michael J. Nalipinski
GE Facility Project Manager

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