GE-Housatonic
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Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue, Pittsfield, MA 01201

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Transmitted via Overnight Courier

January 28, 2005

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

Re: GE-Pittsfield/Housatonic River Site
Lyman Street Area (GECD430)
Supplement to Conceptual Removal Design/Removal Action Work Plan

Dear Mr. Lovely:

In March 2004, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a document entitled *Conceptual Removal Design/Removal Action Work Plan for the Lyman Street Area* (Conceptual Work Plan). That document was prepared in accordance with the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW). Based on evaluations of the data for polychlorinated biphenyls (PCBs) and other Appendix IX+3 constituents (i.e., the constituents listed in Appendix IX of 40 CFR Part 264 plus benzidine, 2-cloroethyl vinyl ether, and 1,2-diphenylhydrazine) in soil at the various evaluation areas at the Lyman Street Area, the Conceptual Work Plan identified the extent of soil-related remediation activities necessary to achieve the applicable Performance Standards established in the CD and SOW. In a letter dated January 10, 2005, EPA provided conditional approval of the Conceptual Work Plan and directed GE to prepare a supplement to the work plan to address the conditions contained therein.

This letter serves as the supplement to the Conceptual Work Plan. Specifically, it presents GE's proposal for additional sampling at Sub-Area 201A within Parcel I9-4-201, and responds to the other comments in EPA's conditional approval letter. In addition, GE's proposed schedule for the initiation of the supplemental sampling and for the submittal of an Addendum to the Conceptual Work Plan is provided herein.

Responses to EPA General Conditions

The following addresses each of the conditions contained in the above-mentioned EPA conditional approval letter.

1. Condition No. 1 of EPA's conditional approval letter stated the owner of Parcel I9-4-201 has informed EPA that the lessor of Sub-Area 201A (Kid Zone, Inc.) plans to construct an outdoor playground adjacent to the back portion of its facility. Accordingly, EPA required that this sub-area be evaluated, as a separate evaluation/averaging area, in accordance with the residential Performance Standards established in the CD and SOW. In addition, EPA noted that it has determined that the boundary between Sub-Area 201A and the remainder of Parcel I9-4-201 should be adjusted to be consistent with the commercial use of the loading dock along the eastern side of the building. Figure 1 depicts this revised boundary of Sub-Area 201A. In these circumstances, EPA directed GE to submit a proposal for the collection of supplemental soil samples at Sub-Area 201A (as revised) so

that sampling of that sub-area will meet the requirements of the CD and SOW for sampling at residential areas, and thereafter to revise its evaluation of the need for and extent of soil remediation at that sub-area in accordance with the residential Performance Standards.

In accordance with that condition of EPA's letter, GE proposes to conduct additional PCB soil investigations for Sub-Area 201A. Consistent with the approach outlined in the SOW for pre-design investigations for PCBs at residential properties, a 25-foot grid sampling pattern has been established for surface soil sampling in this sub-area (see Figure 1), and GE will collect supplemental soil samples from the locations on that grid that have not previously been sampled. Also consistent with the SOW, a 50-foot grid pattern was previously used in this sub-area for sub-surface borings to a depth of 15 feet below ground surface, and thus no additional subsurface sampling for PCBs in necessary. As shown on Figure 1, GE proposes to collect 30 additional PCB samples from the 0- to 1-foot depth interval at Sub-Area 201 to supplement the existing grid-based sampling previously conducted within this sub-area. The PCB data from these samples, together with the existing PCB data, will be used to apply the residential Performance Standard of 2 ppm for PCBs to the relevant evaluation depths for residential areas – i.e., the 0- to 1-foot and 1- to 15-foot depth increments.

In addition, as outlined in the SOW, a minimum of three non-PCB Appendix IX+3 samples are required for a residential area outside of the GE Plant Area for evaluation purposes. At Sub-Area 201A, four surface soil samples (from locations RAA12-N14, Q13, -R13, and -S14) and two subsurface samples (from the 3- to 6-foot depth increment at location RAA12-S14 and the 10- to 15-foot depth increment at location BH000557) have been analyzed for Appendix IX+3 constituents (excluding pesticides and herbicides). Although these existing non-PCB data meet the SOW requirements for Appendix IX+3 sampling at residential areas, the existing subsurface data are limited to the southern part of Sub-Area 201A. Accordingly, GE proposes to perform additional Appendix IX+3 sampling at two subsurface locations on the northern side of the daycare facility. Specifically, GE proposes to collect subsurface Appendix IX+3 samples at locations RAA12-NO14 (1- to 3-foot depth increment) and RAA12-OP13 (6- to 10-foot depth increment), as shown on Figure 1. These samples will be submitted for analyses of Appendix IX+3 constituents (excluding pesticides and herbicides).

2. Condition No. 2 of the EPA conditional approval letter states that GE should consider removal of soil in the 0- to 1-foot depth interval around sample location RAA12-Z3 in the recreational portion of I9-4-14 due to the concentrations of lead found at that location and depth. Samples collected by GE and EPA (split sample) from the 0- to 1-foot depth increment at this location showed lead concentrations of 1,300 ppm and 1,990J ppm, respectively. (Because the EPA sample is J qualified, it is considered to be an estimated concentration.) As shown in the Conceptual Work Plan, the average lead concentration in the 0- to 1-foot depth increment at the recreational portion of Parcel I9-4-14 is 610 ppm (and will be lower following the soil removal proposed for that portion). This is considerably less than the EPA-approved risk-based concentration for lead of 1,313 ppm in recreational areas. Accordingly, no additional soil removal is required to address lead in that area, including at location RAA12-Z3.

3. Condition No. 3 of the EPA conditional approval letter states that GE should consider certain additional soil removals to address PCBs centered around three sample locations on Parcel I9-4-19 – specifically, the 0- to 1-foot depth samples at locations RAA12-V5 and -U6 and the 3- to 6-foot depth sample at location RAA12-X6 (see Figure 4-1 of Conceptual Work Plan). Each of these locations is discussed below:

- Location RAA12-V5 is situated in the commercial portion of Parcel I9-4-19. The PCB concentration in the 0- to 1-foot sample from that location was 95 ppm. As shown in the Conceptual Work Plan, following the soil removals proposed for Parcel I9-4-19, the PCB concentrations for the commercial portion of that parcel will be well below the applicable Performance Standards (see page 4-11 of Conceptual Work Plan). Specifically, the post-remediation spatial average PCB concentration in the 0- to 1-foot depth increment at the commercial portion of Parcel I9-4-19 will be 4.84 ppm, compared to the applicable Performance Standard of 25 ppm; and the discrete PCB concentration in the surface sample from location RAA12-V5 is below the not-to-exceed (NTE) value of 125 ppm for unpaved soil at commercial areas. However, further review of the data indicates that the polygons associated with this surface sample extend slightly into the adjacent recreational portion of this parcel, as shown on Figures D-12 and D-13 of the Conceptual Work Plan. Specifically, the polygons associated with surface sample RAA12-V5 cover approximately 90 square feet in the recreational portion of this parcel. Based on review of this information, GE plans to expand the soil removals in the recreational portion of Parcel I9-4-19 to include removal of the top foot of soil in the portion of the polygons associated with RAA12-V5 that are located within the recreational area. The description of this additional soil removal will be incorporated into the Addendum to the RD/RA Work Plan and the Final RD/RA Work Plan.

- Location RAA12-U6 is also situated in the commercial portion of Parcel I9-4-19, and the 0- to 1-foot sample from that location showed a PCB concentration of 61 ppm. As noted above, the post-remediation spatial average PCB concentration for that depth increment at the commercial portion of this parcel (4.84 ppm) will be well below the applicable Performance Standard (25 ppm). Moreover, the PCB concentration in the surface soil sample from location RAA12-U6 is below the applicable NTE value of 125 ppm, and the polygon associated with this sample does not extend into the recreational portion of this parcel. Accordingly, no additional soil removal is necessary to address this sample.

- Location RAA12-X6 is located in the recreational portion of Parcel I9-4-19. The PCB concentration in the 3- to 6-foot depth sample from that location was 259 ppm. However, as shown in the Conceptual Work Plan (p. 4-13), the spatial average PCB concentration for the 0- to 15-foot depth interval in the recreational portion of this parcel is 25.4 ppm, which is considerably less than the applicable Performance Standard of 100 ppm for that depth interval at recreational areas. Therefore, no additional soil removal is required to address this sample result.

EPA's letter also directed GE to consider soil removal to a 3-foot depth in the narrow area between the proposed 3-foot soil removal areas associated with locations RAA12-V6 and -W6 in the recreational portion of Parcel I9-4-19. Due to the close proximity of these removal areas and based on general constructability issues, GE plans to conduct additional soil removal to a depth of 3 feet below grade in the narrow area that separates them. This additional removal will be incorporated into the Addendum to the Conceptual Work Plan and the Final RD/RA Work Plan.

4. Condition No. 4 of the EPA conditional approval letter requires GE to clarify its plan regarding the execution of a Grant of Environmental Restriction and Easement (ERE) at GE-owned Parcel I9-8-1, where GE will install a vegetative engineered barrier in the southern portion of this parcel and will remove soil in discrete areas in the northern portion of the parcel to achieve the PCB Performance Standards for recreational areas. In response to this condition, GE clarifies that an ERE will be executed on the whole of Parcel I9-8-1.

Schedule

Following EPA approval of this supplement, GE will conduct the additional sampling proposed for Sub-Area 201A. GE proposes to submit an Addendum to the Conceptual RD/RA Work Plan within three months from receipt of EPA approval of this supplement. That Addendum will incorporate the results of the additional sampling at Sub-Area 201A, and propose revised limits of soil removal (as necessary).

Please call Dick Gates or me with any questions.

Sincerely,

Andrew T. Silfer/DAJ

Andrew T. Silfer, P.E.
GE Project Coordinator

Attachment
V:\GE_Pittsfield_CD_Lyman_St\Reports and Presentations\Supplemental to Conceptual RD-RA WP\04852196Ltr.doc

cc: Tim Conway, EPA
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Property Owner - Parcel I9-4-14 & -19
Property Owner - Parcels I9-4-25, -202, & -203
Property Owner - Parcel I9-4-201
Dorothy Mara, Hashim & Spinola
John Martin, Martin & Oliveira
Public Information Repositories
GE Internal Repository

**without attachments*

Figure

BBL®
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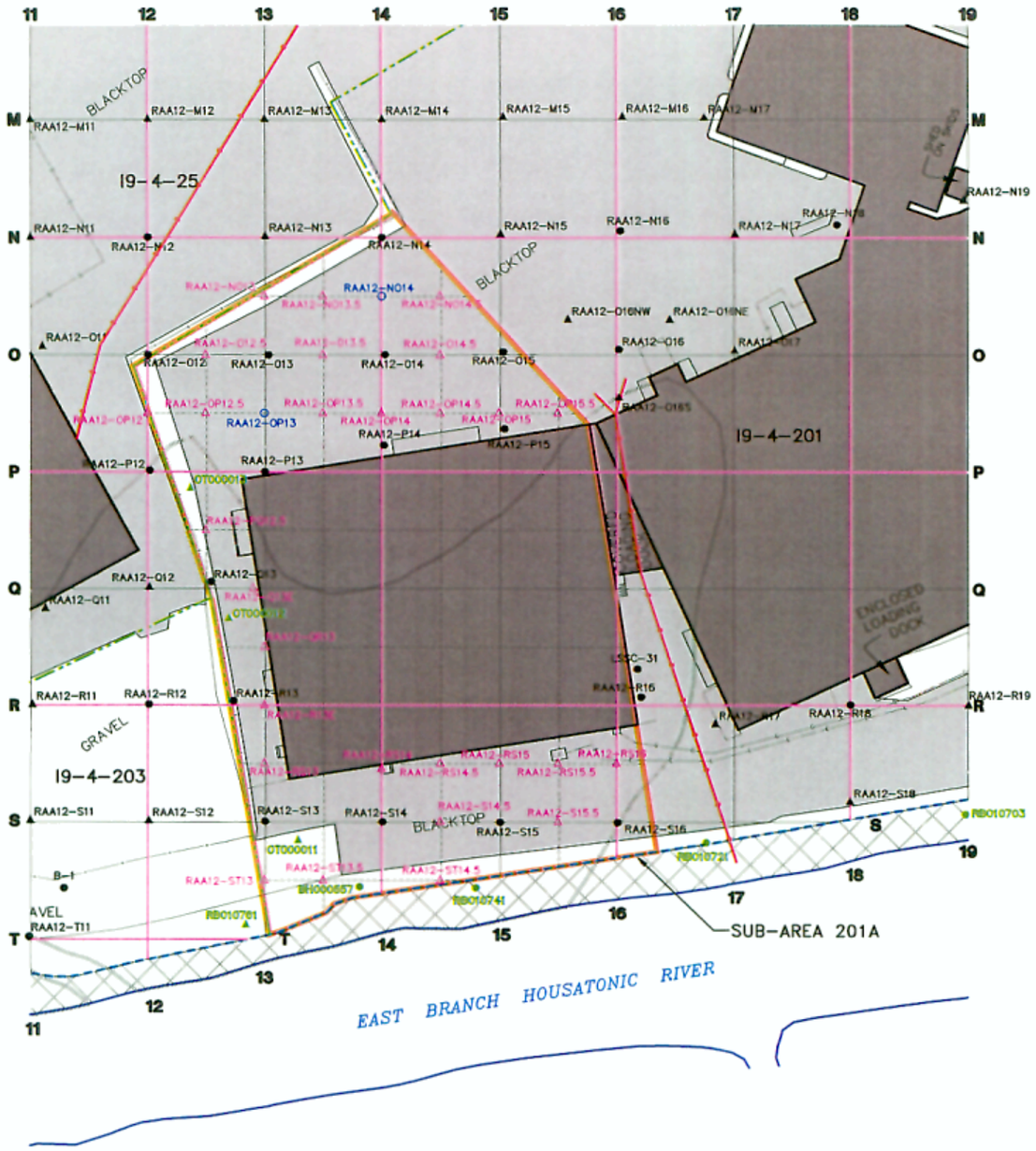
engineers, scientists, economists



LEGEND:

- 100-FOOT SAMPLING GRID
- 50-FOOT SAMPLING GRID
- 25-FOOT SAMPLING GRID
- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- I9-4-201 PARCEL ID
- GUARD RAIL
- CHAIN LINK FENCE
- WOODEN FENCE
- FORMER OXBOW/LOW LYING AREA
- BUILDING
- PAVED AREA
- AREA ADDRESSED AS PART OF 1 1/2-MILE REACH REMOVAL ACTION
- UNDERGROUND ELECTRIC UTILITY LOCATION
- UNDERGROUND GAS UTILITY LOCATION
- STORM DRAIN UTILITY LOCATION
- APPROXIMATE UNDERGROUND UTILITY LINE LOCATION (NOT FROM SURVEY)
- LS-GWP-20 GE SURFACE SOIL SAMPLING LOCATION (0- TO 1- FOOT SAMPLE DEPTH)
- E-2 GE SOIL BORING LOCATION (1- FOOT OR GREATER SAMPLE DEPTH)
- RB010741 EPA SURFACE SOIL SAMPLE LOCATION
- BH000777 EPA SOIL BORING LOCATION
- RAA12-NO13 PROPOSED ADDITIONAL PCB SURFACE SOIL SAMPLE LOCATION
- RAA12-OP13 PROPOSED ADDITIONAL PCB SURFACE SOIL SAMPLE AND APPENDIX IX + 3 SOIL BORING LOCATION
- SUB-AREA 201A OF PARCEL I9-4-201 WHERE ADDITIONAL SAMPLING IS PROPOSED ON 25-FOOT GRID

FIGURE NOTES:

1. MAPPING IS BASED ON SITE SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS INC., DATED 2/5/04 AND FROM AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. – FLOWN IN APRIL 1990 (EDGE OF RIVER).
2. UTILITY LOCATIONS ARE APPROXIMATE AND ALL UTILITIES MAY NOT BE SHOWN. PRIOR TO ANY CONSTRUCTION, THE CONTRACTOR SHALL CONTACT "DIG-SAFE" AND HAVE ALL UNDERGROUND UTILITIES MARKED ON THE GROUND.

0 60' 120'

GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

CONCEPTUAL RD/RA WORK PLAN FOR THE LYMAN STREET AREA

EXISTING AND PROPOSED SOIL SAMPLE LOCATIONS

BBL BLASLAND, BOUCK & LEE, INC. engineers, scientists, economists

FIGURE 1

X: 40490X01.DWG
L: ON=*, OFF=REF*,SHD-UNPAVED
P: PAGESET/SYR-BL
1/28/05 SYR-BS-DMW DJP KMD
N/40490006/40490B01.DWG