GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Electronic Mail/Overnight Delivery

June 4, 2007

Mr. Dean Tagliaferro
EPA Project Coordinator
U.S. Environmental Protection Agency
c/o Weston Solutions, Inc.
10 Lyman Street, Suite 2
Pittsfield, MA 01201

Re: GE-Pittsfield/Housatonic River Site
Lyman Street Area (GECD430) – Properties East of Lyman Street
EPA Requested Information and Analytical Data for Proposed Topsoil Source

Dear Mr. Tagliaferro:

This letter addresses recent comments provided by the U.S. Environmental Protection Agency (EPA) during a May 30, 2007 site visit with the General Electric Company (GE) at the Lyman Street Area - Properties East of Lyman Street (Lyman Street Area).

The attached Revised Engineered Barrier Final Grade Plan and Revised Engineered Barrier Detail drawing (Attachment 1) address the following construction activities:

- extension of the engineered barrier to the edge of curbing along Lyman Street;
- installation of additional curbing along Lyman Street;
- improvement of the sidewalk along Lyman Street;
- replacement of the chainlink fence along the Lyman Street sidewalk within the engineered barrier;
- placement of the engineered barrier around a segment of curved curbing and a guard rail; and
- removal of trees and soil to promote drainage along the swale in the area subject to Natural Resource Restoration/Enhancement.

As stated in the March 29, 2007 document submitted to EPA titled *Lyman Street Area – Properties East of Lyman StreetSupplemental Information Package*, GE is providing analytical results (Attachment 2) associated with sampling of the proposed topsoil source to be used by the on-site contractor, Maxymillian Technologies, Inc. (Maxymillian). Maxymillian has proposed to use topsoil from a stockpile at the Maxymillian facility, located in Pittsfield, Massachusetts. GE initially sampled the proposed topsoil source on April 2, 2007. Analytical results associated with this sample indicated that no constituents were detected above the Massachusetts Contingency Plan (MCP) Method 1 S-1 GW-2/GW-3 soil standards with the exception of lead at a concentration of 373 parts per million (ppm). The Method 1 S-1 GW-2/GW-3 soil standard for lead is 300 ppm. To further quantify the presence of lead within the proposed topsoil source, GE resampled the source on May 16, 2007. Lead was detected in the second sample at 22.4 ppm. The average lead concentration from these two GE samples is 197.7 ppm (well below the Method 1 standard). In addition, Maxymillian has advised GE that it collected 5 composite

samples from the proposed source and that the highest detected lead concentration was 26 ppm. Given that the overall average lead concentration from these samples is well below the Method 1 standard, GE is allowing the use of the topsoil from this source at the Lyman Street Area. This is the same topsoil source that is proposed to be used at the Phase 2 floodplain properties, as stated in the May 29, 2007 document submitted to the EPA titled *Supplemental Information Package for Selected Phase 2 Floodplain Properties*.

If you have any further questions, please feel free to contact me.

Sincerely,

Richard W. Gates/CAA

Richard W. Gates
Remediation Project Manager

CAA/cmb
Attachments

cc: Rose Howell, EPA*
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Linda Palmieri, Weston (2 copies)
Bruce Collingwood, City of Pittsfield
Michael Carroll, GE*
Andrew Silfer, GE
Roderic McLaren, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter LLP
Public Information Repositories
GE Internal Repository
* *without attachments*

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Attachment 1

LEGEND:

- APPROXIMATE PROPERTY LINE LOCATION
- GRADE BREAK
- LIMITS OF GRADING
- 990 — PROPOSED CONTOUR (SEE NOTES 2 AND 4)
- 985.5 X — PROPOSED SPOT ELEVATION
- PROPOSED BARRIER COLLECTION PIPE (SEE NOTE 3)
- PIPE FLOW DIRECTION
- PERMANENT EROSION CONTROL MAT
- H.P. — HIGH POINT
- AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT (SEE NOTES 9, 10 AND 11) 1/6
- AREA SUBJECT TO ENGINEERED BARRIER AND NATURAL RESOURCE RESTORATION
- ACCESS ROAD 8/6
- AREA PREVIOUSLY ADDRESSED AS PART OF 1/2 MILE REACH REMOVAL ACTIVITIES (SEE NOTE 12)

NOTES:

1. REFER TO THE TECHNICAL DRAWINGS OF THE FINAL RD/RA WORKPLAN FOR ADDITIONAL BASEMAP INFORMATION, CONTRACTOR REQUIREMENTS AND DESIGN DETAILS.
2. PROPOSED AND EXISTING CONTOUR INTERVAL IS 1 FOOT.
3. ENGINEERED BARRIER COLLECTION PIPES SHALL HAVE A MINIMUM SLOPE OF 0.5%.
4. PROPOSED GRADES REPRESENT TOP OF ENGINEERED BARRIER (i.e., TOPSOIL).
5. REFER TO NOTE 6, DRAWING 2 FOR DESCRIPTION OF NAPL COLLECTION SYSTEM ACTIVITIES.
6. CHAINLINK FENCE REMOVED AS PART OF THE SITE WORK ACTIVITIES SHALL BE REPLACED AROUND THE PERIMETER OF EACH PROPERTY AT THE PROPERTY LINE. WHEREVER POSSIBLE, PORTIONS OF THE CHAINLINK FENCE SHALL BE RELOCATED OUTSIDE THE LIMITS OF THE ENGINEERED BARRIER TO MINIMIZE LINER PENETRATIONS. PORTIONS OF THE CHAINLINK FENCE THAT MUST BE PLACED WITHIN THE LIMITS OF THE ENGINEERED BARRIER ALONG LYMAN STREET, SHALL BE INSTALLED INSIDE OF THE SIDEWALK (AS SHOWN ON DETAIL 1 OF DRAWING 2 OF THESE TECHNICAL DRAWINGS).
7. THE BARRIER COLLECTION PIPE OUTLET SHALL EXTEND INTO THE EXISTING RIVER BANK RIPRAP.
8. THE CONTRACTOR SHALL VERIFY THE 12-INCH THICKNESS OF THE ENGINEERED BARRIER AND 18-INCH THICKNESS OF THE ACCESS ROAD IN ACCORDANCE WITH THE PROJECT'S REQUIREMENTS.
9. THE AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT SHALL BE GRADED AS SHOWN WITH 3 INCHES (MINIMUM) OF TOPSOIL PLACED ABOVE IMPORTED SOIL FILL OR 3 INCHES OF TOPSOIL PLACED ABOVE EXISTING/EXCAVATED SURFACE.
10. BRUSH AND OTHER GROUND VEGETATION WITHIN THE AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT SHALL BE REMOVED. ALL TREES LARGER THAN SIX INCHES IN DIAMETER WILL NOT BE REMOVED AND SHALL BE PROTECTED FROM DAMAGE AND DISTURBANCE. SOIL PLACED IN THE VICINITY OF THE TREES TO REMAIN SHALL BE FEATHERED SO THAT SOIL IS NOT PLACED DIRECTLY AROUND THE TRUNK OF THE TREE.
11. ALL SOIL REMOVED AS PART OF REGRADING ACTIVITIES IN THE AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT SHALL BE DISPOSED OF AS NON-TSCA SOIL AT THE HILL 78 OPCA.
12. TREES ALONG THE RIVERBANK WITHIN THE AREA PREVIOUSLY ADDRESSED AS PART OF 1/2 MILE REACH REMOVAL ACTIVITIES THAT ARE WITHIN THE ENGINEERED BARRIER LIMITS MUST BE RELOCATED ALONG THE RIVERBANK IN LOCATIONS DETERMINED BY GE. ALL SOIL REMOVED AS PART OF THE TREE RELOCATION ACTIVITIES SHALL BE DISPOSED OF AS TSCA SOIL AT AN OFFSITE DISPOSAL FACILITY.
13. ABOVE GRADE/BELOW GRADE TRANSITION OF THE GROUNDWATER COLLECTION PIPE SHALL BE RELOCATED TO PARCEL I9-8-2, JUST OUTSIDE OF THE ENGINEERED BARRIER, TO AVOID LINER PENETRATIONS.
14. WOOD STOCKADE FENCE THAT EXISTS 2 FEET SOUTH OF THE PROPERTY LINE SHALL BE RELOCATED 2 FEET NORTH TO THE PROPERTY LINE TO FACILITATE NATURAL RESOURCE RESTORATION/ENHANCEMENT ACTIVITIES.
15. THE GUARD RAIL AND POSTS SHALL BE PROTECTED AND REUSED FOLLOWING CONSTRUCTION OF ENGINEERED BARRIER. A CONCRETE COLLAR AND GEOSYNTHETICS PENETRATION SEAL SHALL BE PLACED AROUND EACH OF THE POSTS.
16. THE ENGINEERED BARRIER SHALL BE ATTACHED TO EACH SIDE OF THE EXISTING CURVED CURB USING A SOIL/BENTONITE SEAL. THE SOIL/BENTONITE SEAL SHALL CONSIST OF A MIXTURE OF SOIL FILL AND POWDERED BENTONITE. SOIL FILL SHALL BE UNIFORMLY BLENDED WITH 5 TO 10% BENTONITE.
17. THE ASPHALT SIDEWALK ALONG THE WESTERN SIDE OF THE AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT SHALL BE CLEANED OF ALL SOIL/DEBRIS AND RESTORED WITH ASPHALT AS NEEDED. THE CHAINLINK FENCE SHALL BE REPLACED ALONG THE EASTERN EDGE OF THE SIDEWALK. ANY REGRADING TO THE EAST OF THE SIDEWALK WILL NOT EXCEED A 25% GRADE.
18. THE DRAINAGE SWALE LOCATED AT THE NORTHEAST CORNER OF THE SITE SHALL BE RE-ESTABLISHED SO THAT IT DISCHARGES AT A UNIFORM GRADE TO THE EXISTING LOW POINT TO THE EAST. SOIL AND TREES SHALL BE REMOVED AS NECESSARY TO PROMOTE POSITIVE DRAINAGE TO THE EAST. THE CENTERLINE OF THE DRAINAGE SWALE SHALL BE LOCATED A SUFFICIENT DISTANCE AWAY FROM THE EXISTING ASPHALT TO AVOID POTENTIAL IMPACTS.

SYR-85-NES LAF KFS LAYER: ON=*; OFF=REF, 120691X01|BLDG-SH, |BNDS, |EO_PAVEMENT, |FL_CHAINLINK, |FL_CHAINLINK-REMOVED, |MISC_BOLLARDS, |REMOVALBDRY
G:\CAD\GE-CAD\GE_ACTIVE\C\30916002\30916001.DWG SAVED:6/4/2007 1:38 PM LAYOUT:1 PAGESETUP:---- PENTABLE:PLTCONT1.CTB PRINTED:6/4/2007 1:45 PM BY:JHRICHARDSON
PROJECTNAME:----
IMAGES:
XREFS:
30916X01
30916X02

ORIGINAL SCALE APPLIES TO 22"X34" DRAWING

30' 0 30' 60'

THIS DRAWING WAS PREPARED AT THE SCALE(S) INDICATED. INACCURACIES IN THE STATED SCALE(S) MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED. **USE THE GRAPHIC SCALE BAR(S) TO DETERMINE THE ACTUAL SCALE(S) OF THIS DRAWING.**

No.	Date	Revisions	Init

Professional Engineer's Name		
Professional Engineer's No.		
State: MASS	Date Signed	
Project Mgr.: CAA	Designed by: RWP	Drawn by: NES

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GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
LYMAN STREET AREA REMEDIAL ACTION

REVISED ENGINEERED BARRIER FINAL GRADE PLAN

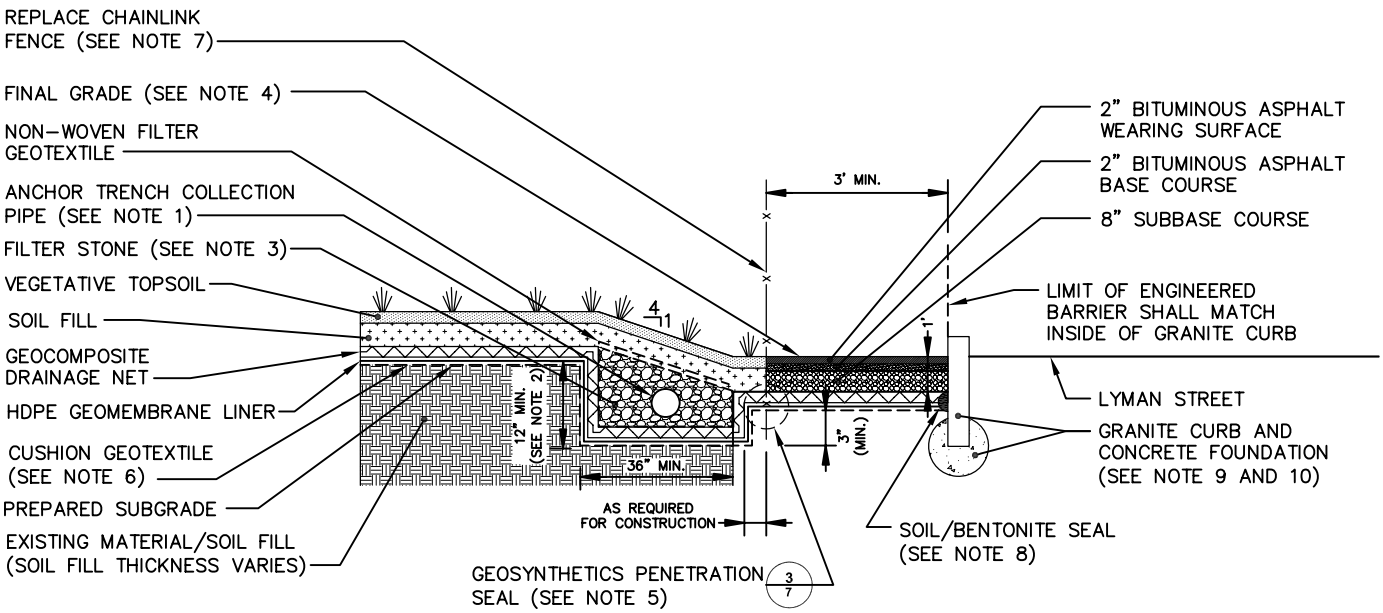
TECHNICAL DRAWINGS

ARCADIS Project No. 301.96

Date MAY 2007

ARCADIS U.S., INC.
6723 TOWPATH ROAD
SYR., N.Y. 13214-0066
315.446.9120

1



NOTES:

1. ANCHOR TRENCH COLLECTION PIPE SHALL BE 6"ø PERFORATED SMOOTH-BORE CORRUGATED HDPE.
2. ANCHOR TRENCH DEPTH MAY EXCEED 12-INCHES AS NECESSARY TO ACHIEVE COLLECTION PIPE INVERTS SHOWN ON DRAWING 1.
3. FILTER STONE SHALL BE WRAPPED IN NON-WOVEN GEOTEXTILE. NON-WOVEN GEOTEXTILE SHALL BE OVERLAPPED AS SHOWN.
4. IN THE LOCATION OF THE SIDEWALK, THE SURFACE OF THE ENGINEERED BARRIER SHALL BE ASPHALT.
5. REFER TO THE TECHNICAL DRAWINGS OF THE FINAL RD/RA WORK PLAN FOR ADDITIONAL DESIGN DETAILS.
6. CUSHION GEOTEXTILE IS REQUIRED WHERE ENGINEERED BARRIER IS INSTALLED ABOVE EXISTING SOIL/PAVEMENT.
7. THE CHANILINK FENCE SHALL BE INSTALLED ALONG THE EASTERN SIDE OF THE SIDEWALK, AND NO FENCE POSTS SHALL BE INSTALLED WITHIN THE ANCHOR TRENCH.
8. SOIL/BENTONITE SEAL TO CONSIST OF A MIXTURE OF SOIL FILL AND POWDERED BENTONITE. SOIL FILL SHALL BE UNIFORMLY BLENDED WITH 5 TO 10% BENTONITE.
9. GRANITE CURB AND CONCRETE FOUNDATION SHALL BE INSTALLED ALONG THE SIDEWALK WHERE NO CURB EXISTS IN LINE WITH THE EXISTING CURB, WITH THE EXCEPTION OF THE ENTRANCE TO THE ACCESS ROAD.
10. EXISTING STREET PAVEMENT SHALL BE REPAIRED AS NECESSARY AND SEALED AGAINST NEW CURBING.

LYMAN STREET SIDEWALK ANCHOR TRENCH

1

NOT TO SCALE

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LYMAN STREET AREA REMEDIAL ACTION

REVISED ENGINEERED BARRIER DETAIL

GENERAL

ARCADIS Project Number
301.96

Date
MAY 2007

2

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Attachment 2

TABLE 1

ANALYTICAL RESULTS FOR PROPOSED TOPSOIL SOURCE

MTI - PITTSFIELD YARD TOPSOIL SAMPLING PROGRAM
LYMAN STREET AREA

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Parameter / Sample ID: / Date Collected:	MTI-Topsoil-C1 04/02/07	MTI-Topsoil-Lead-C1 05/16/07
Volatile Organics		
2-Butanone	0.0042 J	NA
Acetone	0.047	NA
Toluene	0.0047 J	NA
Semivolatile Organics		
Benzo(a)anthracene	0.074 J	NA
Benzo(a)pyrene	0.063 J	NA
Chrysene	0.071 J	NA
Fluoranthene	0.13 J	NA
Phenanthrene	0.063 J	NA
Pyrene	0.12 J	NA
Inorganics		
Arsenic	4.97	NA
Barium	57.8	NA
Beryllium	0.363 B	NA
Cadmium	0.159 B	NA
Chromium	12.7	NA
Cobalt	9.56	NA
Copper	16.2	NA
Lead	373	22.4
Mercury	0.0624	NA
Nickel	15.9	NA
Thallium	0.0838 B	NA
Vanadium	15.5	NA
Zinc	92.1	NA

Notes:

1. To further quantify the presence of lead within the proposed topsoil source, GE resampled the proposed source for lead on May 16, 2007. The average lead concentration from the two GE samples is 197.7 ppm (well below the Method 1 S-1 soil standard of 300 ppm). In addition, Maxymillian Technologies, Inc. has advised GE that it collected 5 composite samples from the proposed source and that the highest lead concentration was 26.2 ppm.
2. Samples were collected by ARCADIS BBL, and submitted to SGS Environmental Services, Inc. for analysis of PCBs, volatiles, semivolatiles, and metals,
3. NA - Not Analyzed.
4. Only detected constituents are summarized.

Data Qualifiers:

Organics (PCBs, volatiles, semivolatiles)

J - Indicates an estimated value less than the practical quantitation limit (PQL).

Inorganics

B - Indicates an estimated value between the instrument detection limit (IDL) and PQL.