



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

06-0128
SDMS 274239

July 2, 2002

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 March 2002 Pre-Design Investigation Work Plan for the Lyman Street Area Removal Action, General Electric Housatonic River Project Site, Pittsfield, Massachusetts.**

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Pre-Design Investigation Work Plan for the Lyman Street Area Removal Action*.

This *Pre-Design Investigation Work Plan for the Lyman Street Area Removal Action* (Work Plan) 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:

Conditions

1. GE has indicated that they have not been able to obtain maps showing the subsurface utilities for a large portion of the non-GE owned portion of the Lyman Street RAA. To address this issue, GE proposes to field locate these subsurface utilities as part of the pre-design investigations. This approach seems reasonable, but the critical issue is timing. The field reconnaissance needs to be conducted prior to the start of field investigations; and based on the results GE shall revise the distribution of the proposed soil samples, as necessary, to ensure that samples are collected along the identified utility corridors.
2. GE proposes to exclude pesticide and herbicide analysis at the Lyman Street RAA. Based on the historic soil sampling data, EPA disagrees with GE's proposal to drop pesticide and herbicide sampling and analyses at the Lyman Street RAA. The detection of aldrin, 4,4'-DDE, 4,4'-DDT, endrin aldehyde and heptachlor epoxide at concentrations far exceeding the Massachusetts Contingency Plan Reportable Concentrations (MCP RC) in subsurface samples suggests that GE's first two arguments (page 4-9, second paragraph) are incorrect

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or not applicable. For example, aldrin was detected at an estimated concentration (J value) of 170 ppm at 10- to 12-ft at LS-11 (aldrin's MCP RC is 0.04 ppm for S-2 soils) and 4,4'-DDE was detected at 26 ppm at LS-30 (4,4'-DDE's MCP RC is 2 ppm for S-2 soils). These deeper detections suggest that pesticides are associated with the fill observed at the site. GE shall include pesticides and herbicides in the Appendix IX+3 analyses for the Lyman Street RAA. GE shall analyze a subset of the Lyman Street Area Appendix IX+3 soil samples for these constituents. The subset of Appendix IX+3 samples shall be both vertically and spatially representative of the RAA and shall at a minimum include depth samples from Oxbow D.

3. EPA has collected and analyzed additional soil samples at the Lyman Street RAA that GE shall need to include in the existing data to the extent that these sampling locations are within the RAA or, would have Thiessen polygons extending into the RAA.
 - Three additional PCB surface soil samples were collected west of the day care center at 10 Lyman Street (H2-OT000011, -12 and -13).
 - EPA has recently collected PCB and Appendix IX soil samples from borings associated with the 1 ½-Mile Removal Action. Three of these borings are located within the Lyman Street Removal Action Area. EPA will forward the analytical results for these samples when they become available.
4. Some existing PCB soil samples, characterizing significant contamination (greater than 500 ppm) in Oxbow D, have been designated for only "Potential Supplemental" use (e.g., LS-8, LS-13). GE shall either utilize the existing data or resample at those locations where existing data showing significantly elevated PCB concentrations in soil.
5. GE has rejected some of the PCB data at locations LS-2 (8- to 12-ft) and LS-4 (6- to 12-ft) due to depth interval issues. EPA doesn't agree with the rejection of these types of samples due to the length of the sample when the sampling interval falls within the RAA spatial averaging intervals. GE shall review its depth interval evaluations to ensure that samples such as these are not rejected.
6. Fieldwork associated with the 1½-Mile Removal Action is scheduled to begin by August or September 2002. Parts of the Lyman Street Parking Lot and the northern riverbank area along parcels I9-4-14, -19, -25, -201 and -203 may be difficult to access, due to road building and removal action activities in these areas. GE shall initiate pre-design investigation activities in these areas (to the extent practical) within 15 days of EPA approval of the supplemental information letter (discussed below).
7. EPA considers a 12-month time frame for the submittal of the Pre-Design Investigation Report to be excessive. EPA considers 9 months to be a reasonable time frame for submittal – unless GE can document other scheduling conflicts.

8. GE shall revise site maps to illustrate the new parcel ownership and alignment per GE's letter dated April 2, 2002. Because parcels I9-4-202 and I9-4-25 are both contiguous and currently under the same ownership, GE shall sample and evaluate these two parcels as a single property.
9. GE shall implement the following list of PCB and Appendix IX+3 sampling revisions:
 - Move the 0- to 1-ft Appendix IX+3 sample at RAA12-O14 to grid node O16 for better spatial representation.
 - Move the 0- to 1-ft Appendix IX+3 sample at RAA12-O21 to grid node M20 for better spatial representation.
 - Replace the 0- to 1-ft Appendix IX+3 sample at RAA12-M7 with a sample at grid node R13 and move R13 approximately 10 feet westward into the unpaved area.
 - Move the 0- to 1-ft Appendix IX+3 sample at RAA12-J23 to grid node K22 to better characterize the western unpaved area north of the Lyman Street Parking Lot.
 - Move the 0- to 1-ft Appendix IX+3 sample at RAA12-M15 to grid node M14 to better characterize the unpaved area at 10 Lyman Street.
 - Convert surface sampling location RAA12-S14 to a soil boring. Move the proposed 3- to 6-ft Appendix IX+3 sample at location RAA12-P14 to the 3- to 6-ft depth interval at location RAA12-S14, and collect samples for all Appendix IX+3 analyte groups.
 - Replace surface sampling location RAA12-Q16 with a soil boring adjacent to existing soil boring LSSC-31. At this new location, collect Appendix IX+3 samples from the 3- to 6-ft (formerly the 0- to 1-ft sample at RAA12-Q16) and 10- to 15-ft (moved from proposed soil boring RAA12-R18 at the same depth) depth intervals.
 - Relocate the 1- to 3-foot depth interval Appendix IX+3 sample proposed for location L-28 to location L-26, to better characterize Oxbow D.
 - Collect an additional 6- to 10-ft Appendix IX+3 sample at either location S-11 or R-12.
 - Collect VOC samples from the 6- to 10-ft depth interval at location RAA12-J22 and the 10- to 15-ft depth interval at location RAA12-H32, in addition to the proposed Appendix IX+3 analyte groups.
 - Move proposed surface soil sample location RAA12-P13 to the unpaved area west of grid node Q13.
10. In the Work Plan, GE is proposing to evaluate Parcel I9-4-201 as a commercial/industrial property. However, the use of this parcel has changed since the Consent Decree was signed; there is currently a day care facility located in the western portion of the parcel. Given the change in use of the western portion of Parcel I9-4-201, GE shall divide Parcel

I9-4-201 into two separate types of properties for the purposes of developing appropriate response actions. The parcel shall be divided into the two areas, by a line defined as follows: connecting the corner of the property near grid location N14 to the northeast corner of the building housing the day care center (north of grid location P16); extending through the building to the corner near grid location Q16; and, running south down the eastern edge of the building housing the day care center, and continuing straight on to the top of the Housatonic riverbank (slightly southeast of grid location S16).

GE shall sample the western portion of Parcel I9-4-201 following the protocols for residential sampling of PCBs in Former Oxbow Areas, and the eastern portion following the commercial/industrial PCB sampling protocols for Former Oxbow Areas.

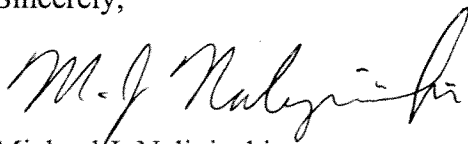
Once the pre-design investigation sampling is complete, GE shall submit a letter to EPA (prior to the submittal of the Lyman Street Area Pre-Design Investigation Report) proposing appropriate approaches for response actions for the western portion of Parcel I9-4-201, based on the Former Oxbow Area Performance Standards, and subject to EPA review and approval.

Based on the discussions between EPA, DEP, and GE, the conditions listed above are amenable to all parties and the PDIWP shall be considered 'conditionally approved'. For clarification purposes, GE shall address the conditions in this letter by providing a supplemental information letter to EPA within 15 days of receipt of this letter, for review and approval.

EPA reserves its right to perform additional sampling in the area subject to Pre-Design Investigation Work Plan for the Lyman Street Area Removal Action 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) 918-1268.

Sincerely,



Michael J. Nalipinski
GE Facility Project Manager

cc: Dick Gates, GE
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