



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

06-0130
JDMS 214240

July 25, 2002

Mr. Andrew T. Silfer
Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue
Pittsfield, MA 01201

Re: Comments on General Electric's July 16, 2002 Lyman Street Area Pre-Design Investigation Work Plan Supplemental Information Letter, 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 *Lyman Street Area Pre-Design Investigation Work Plan Supplemental Information Letter*.

This *Lyman Street Area Pre-Design Investigation Work Plan Supplemental Information Letter* 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 proposed to collect an additional 20 samples, to be analyzed for pesticides/herbicides, which GE's proposal distributes across the Removal Action Area (RAA). It is EPA's understanding that this limited pesticide/herbicide sampling will be used to determine if the RAA should be evaluated further for pesticides/herbicides. Therefore, this sampling should focus on filled areas (former oxbows) and the area currently being use for a day care facility. The proposed sampling does not adequately represent these historical fill areas, and unnecessarily represents the northern portions of the RAA. Specifically, no pesticide/herbicide sampling is proposed for Former Oxbow E at any depth interval; and Former Oxbow B is not adequately characterized in the 1- to 3-foot, 3- to 6-foot and 6- to 10-foot depth intervals (only one existing sample in the shallow depth intervals, and no existing or proposed samples for the 6- to 10-foot depth interval).

Therefore, GE shall relocate those proposed samples that are outside the oxbow areas to

historic fill areas, so that all depth intervals of each oxbow are characterized. If these samples indicate further concern regarding pesticides/herbicides, GE shall be required to further evaluate pesticides/herbicides (and determine areas of concern) at the same frequency (and in the same manner) as other Appendix IX+3 constituents. GE shall relocate the proposed pesticide/herbicide samples at the following grid locations:

- 0- to 1-foot depth interval- T4 to W6, N8 to S11, and J14 to H30.
 - 1- to 3-foot depth interval- V2 to Z4, P4 to T11, L12 to R12, and L26 to H32.
 - 3- to 6-foot depth interval- T4 to V5, L10 to S14, and O24 to J22.
 - 6- to 10-foot depth interval- V2 to Z4, R8 to T11, and J14 to H30.
 - 10- to 15-foot depth interval- P4 to T9, N10 to R16, D28 to H32.
2. GE has proposed to link three (3) parcels for sampling and evaluation purposes: I9-4-203, I9-4-25, and I9-4-202. EPA has already accepted GE's proposal to combine parcels I9-4-25 and I9-4-202 (EPA Condition No. 8, July 2, 2002 letter), however, EPA doesn't agree with GE's proposal to combine parcel I9-4-203 with I9-4-25. Parcel I9-4-203 is on the Housatonic River, unpaved, and within the historical extent of Oxbow B. In consideration of these factors, GE shall sample and evaluate parcel I9-4-203 as a separate property. To ensure that there are sufficient Appendix IX samples for the depth intervals to be evaluated at parcel I9-4-203, GE shall relocate the proposed Appendix IX+3 samples at the following grid locations:
- 0- to 1-foot depth interval- Q12 to R12;
 - 1- to 3-foot depth interval- T9 to T11; and
 - 6- to 10-foot depth interval- T9 to T11.
3. As discussed in EPA's July 2, 2002 letter, fieldwork associated with the 1½-Mile Removal Action is scheduled to begin by 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. To help prioritize GE's proposed sampling schedule, EPA has developed the following list of sampling areas in order of priority:
- Area at Lyman Street Parking Lot where auto dealership parking has been proposed.
 - Northern riverbank area along parcel I9-4-201.
 - Remaining portion of Lyman Street Parking Lot.
 - Northern riverbank area along parcels I9-4-25 and I9-4-203.
 - Northern riverbank area along parcels I9-4-19 and I9-4-14.
 - Remaining portions of Lyman Street RAA.

If you have any questions, please contact me at (617) 918-1365 or Mike Nalipinski at (617) 918-1268.

Sincerely,

A handwritten signature in black ink that reads "Bryan Olson". The signature is written in a cursive style with a large initial "B" and "O".

Bryan Olson
GE Team Leader

cc: Dick Gates, GE
James Bieke, Shea & Gardner
Jim Nuss, BBL -
Sue Steenstrup, MDEP
Sue Keydel, MDEP
Mike Nalipinski, US EPA
Holly Inglis, US EPA
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Mayor Sara Hathaway, City of Pittsfield
Tom Hickey, PEDDA
Teresa Bowers, Gradient
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