



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

01-0599
SDMS 44633

June 20, 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 April 2003 submittal *Pre-Design Investigation Report for the Lyman Street 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 Lyman Street 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 conditions presented in this letter. The General Electric Company (GE) shall address these conditions and provide the results of the proposed field activities within 60 days from the date of this letter in a supplemental PDI letter report.

Conditions

1. GE reports in the Soil Sampling Data Validation Report (Appendix C, page 17) that the PCB results from the 3- to 6-foot sample location at RAA12-V4 were rejected. GE shall resample that location as part of the proposed supplemental soil investigations to meet the PCB grid sampling requirements specified in the Statement of Work for Removal Actions Outside the River (SOW).
2. GE proposes to reduce the extent of the recreational area behind parcels I9-4-14, I9-4-19 and I9-4-25, as presented on Figure 2 in the PDI Report. The extent of the proposed recreational area is significantly smaller than the area specified in the SOW and Pre-Design Investigation Work Plan (PDIWP). EPA does not agree with this proposed change to the extent of the recreational area. GE shall utilize the recreational area extent, as originally specified on Figure 2-4 of the SOW, in the evaluation of GE's compliance with Performance Standards at the Lyman Street Removal Action Area.
3. On page 2-7, GE proposes to conduct additional sampling around location RAA12-O16 to delineate elevated lead concentrations (51,000 ppm) detected in the 0- to 1-foot depth interval. The vertical extent of the elevated lead concentrations need to be determined. To address these issues, GE shall collect additional lead samples below 1 foot at RAA12-O16 in the 1- to 3-foot and 3- to 6-foot depth intervals
4. Elevated PAH concentrations (e.g., Benzo(a)pyrene at 26 and 47 ppm) were detected in soil boring RAA12-V6 at the 3- to 6- and 6- to 10-foot depth intervals. The vertical extent of these PAH concentrations need to be determined. EPA shall conduct wild card sampling at this location in the 0- to 1-foot and 1- to 3-foot depth intervals for PAH constituents.

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

5. The comparison of EPA split sample data with the results from four GE soil samples collected during the Lyman Street field effort revealed a significant difference between EPA's split data and GE's data. The following four GE samples were reviewed: RAA12-L24, 6-8ft (EPA, LS-BH000789-0-0060); RAA12-L26, 3-6ft (EPA, LS-BH000788-0-0030); RAA12-Y4, 1-3ft (EPA, LS-BH000808-0-0010); and RAA12-Z3, 0-1ft (EPA, LS-BH000791-0-0000).

Over the course of the project the split sample results have varied, but they have generally been comparable. In this case, however, the differences are significant. GE and its subcontractors involved with these sampling and laboratory analysis efforts shall investigate the sampling, handling and analysis of these samples to determine if there are any potential problems that need to be addressed. GE and its subcontractors shall consult with EPA and propose corrective actions or resampling of specific locations, if necessary, to address this issue.

EPA reserves its right to perform additional sampling in the areas subject to PDIWP 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
	Roderic McLaren	GE
	James Bieke,	Shea & Gardner
	Jim Nuss,	BBL
	Richard Nasman	Berkshire Gas
	Sue Keydel,	MDEP
	Sue Steenstrup,	MDEP
	Robert Bell,	MDEP
	Alan Weinberg,	MDEP
	Bryan Olson,	US EPA
	Holly Inglis,	US EPA
	John Kilborn,	US EPA
	Tim Conway,	USEPA
	K.C. Mitkevicius,	USACE
	Dawn Jamros,	Weston Solutions ✓
	Pittsfield MA Office,	US EPA
	Mayor Sara Hathaway,	City of Pittsfield
	Public Information Repositories (4)	
	Site File	