



01-0631

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

SDMS 46909

Transmitted Via Overnight Delivery

September 5, 2003

Mr. Bryan Olson
EPA Project Coordinator
U.S. Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
Lyman Street Area (GECD430)
Additional Supplemental Pre-Design Soil Investigations**

Dear Mr. Olson:

In April 2003, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a document titled *Pre-Design Investigation Report for the Lyman Street Area Removal Action* (PDI Report). The PDI Report included the results of pre-design soil investigations conducted by GE and EPA, and assessed the overall adequacy of the pre-design results to support future Removal Design/Removal Action (RD/RA) activities. Based on that assessment, GE proposed in the PDI Report to perform certain additional soil investigations and present the results to EPA in a letter report. EPA conditionally approved the PDI Report (and the proposed supplemental sampling) in a letter dated June 20, 2003. The letter report for the Supplemental Pre-Design Soil Investigations was submitted on August 18, 2003. At the time that letter report was submitted, results were not available from sampling performed by EPA at the RAA12-V6 grid location within at Parcel I9-4-19. These sample results were subsequently provided to GE, on August 27, 2003.

Review of the recent EPA results indicates the need for additional supplemental sampling to further assess the presence of polycyclic aromatic hydrocarbons (PAHs) in the 1- to 3-foot depth interval in the area proximal to RAA12-V6. As described below, this additional sampling is proposed at this depth interval at three locations near RAA12-V6. In addition, as further described below, based on further review of the existing PDI data, an additional supplemental sample is proposed to assess the presence of lead at the 1- to 3-foot depth interval in the recreational area near RAA12-Y4 within Parcel I9-4-14. This letter proposes this additional sampling and supplements the sampling proposed in the August 18, 2003 letter report mentioned above.

A. Proposed Additional Pre-Design Sampling

In combination with the pre-design investigation soil data, the results for the supplemental pre-design soil sampling performed to date are generally sufficient to characterize soils within the Lyman Street Area and support the necessary evaluations for this RAA. However, as described in the August 18, 2003 supplemental letter report, and based on the results of the recent EPA sampling and further review of existing PDI data, additional supplemental sampling is proposed as follows.

Additional PAH Sampling

Results of EPA's recent sampling for PAHs at the 0- to 1-foot depth interval at the RAA12-V6 location indicate that concentrations of these compounds are not elevated at this depth. However, the sample results for the 1- to 3-foot depth interval at this location indicate elevated PAH concentrations. Therefore, GE proposes to collect three additional supplemental samples as shown on Figure 1. Additional supplemental samples will be collected at the 1-

to 3-foot depth interval at the proposed RAA12-VNE, RAA12-V6SE, and RAA12-V6SW locations for analysis for SVOCs (including PAHs). These locations are approximately 35 feet northeast, 25 feet southeast, and 35 feet southwest of RAA12-V6, respectively.

Additional Lead Sampling

Further review of existing PDI data indicates that an additional supplemental sample is needed to further assess elevated lead concentrations detected at the 1- to 3-foot depth interval at RAA12-Y4 (Figure 1). Therefore, GE proposes to collect an additional supplemental sample for lead at the 1- to 3-foot depth interval at the RAA12-Y4NW location, approximately 35 feet northwest of RAA12-Y4 (Figure 1).

All of the additional supplemental samples will be collected and analyzed as specified in the approved FSP/QAPP.

If during the course of performing RD/RA evaluations for the RAA, GE identifies the need for other supplemental data to support a potential response action, GE will propose the scope of such supplemental sampling to EPA for review and approval.

B. Future Activities and Schedule

GE will submit the results of the additional sampling proposed in this letter and in the August 18, 2003 supplemental letter report in an Additional Supplemental PDI Report in letter format, within 45 days from the later of EPA's approval of this letter or EPA's approval of the August 18, 2003 supplemental letter report. The Conceptual RD/RA Work Plan for the Lyman Street Area Removal Action will be submitted within 4 months from EPA's approval of the Additional Supplemental PDI Report.

Please contact Dick Gates or me with any questions.

Sincerely,



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

Enclosure

V:\GE_Pittsfield_CD_Lyman_St\Agreements and Proposals\60832196.doc

cc: Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA
Michael Nalipinski, EPA
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Eileen Barnes, MDEP
Alan Weinberg, MDEP*
Robert Bell, MDEP*
Thomas Angus, MDEP*
Dawn Jamros, Weston
Nancy E. Harper, MA AG*
Dale Young, MA EOEAA*
Mayor Sara Hathaway, City of Pittsfield
Thomas Hickey, Director, PEDAA*
Jeffrey Bernstein, Bernstein,
Cushner & Kimmell*

Pittsfield Department of Health
Michael Carroll, GE*
Richard Gates, GE
Rod McLaren, GE
James Nuss, BBL
James Bieke, Shea & Gardner
Richard Nasman, Berkshire Gas
Kelly Hansel, ENSR
David Mauro, META
Michael McHugh, Rich May
Charles J. Dooley, Western Mass. Electric Co.
Property Owner – Parcel I9-4-14 & -19
Dorothy Mara, Esq., Hashim & Spinola
Public Information Repositories
GE Internal Repository

* cover letter only

Figure



- LEGEND**
- APPROXIMATE REMOVAL ACTION AREA BOUNDARY
 - FENCE
 - PROPERTY LINE (APPROXIMATE)
 - FORMER DRAIN/DRAW/UTING AREA
 - ▲ RAA12-0196 EXISTING SUPPLEMENTAL POI SURFACE SOIL SAMPLE LOCATION
 - RAA12-10 EXISTING SUPPLEMENTAL POI SOIL BORING SAMPLE LOCATION
 - RAA12-16 EXISTING POI AND EPA WILD CARD SOIL BORING SAMPLE LOCATION
 - RAA12-14 EXISTING POI SOIL BORING SAMPLE LOCATION
 - RAA12-19* PROPOSED ADDITIONAL SUPPLEMENTAL POI SOIL BORING SAMPLE LOCATION (PROPOSED AUGUST 18, 2003)
 - RAA12-19** PROPOSED ADDITIONAL SUPPLEMENTAL POI SOIL BORING SAMPLE LOCATION (PROPOSED SEPTEMBER 5, 2003)
 - BUILDING
 - ▨ PAVED AREA
 - ▩ AREA ADDRESSED AS PART OF 1/2-MILE REACH REMOVAL ACTION OR 1 1/2-MILE REACH REMOVAL ACTION
 - RECREATIONAL PROPERTY (GE OWNED)
 - RECREATIONAL PROPERTY (NON-GE OWNED)
 - COMMERCIAL/INDUSTRIAL PROPERTY (NON-GE OWNED)

- GENERAL NOTES**
1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. (FORM 8 APR 1990) (DATA PROVIDED BY GENERAL ELECTRIC COMPANY AND BLISS AND BOUCK & LEE, INC. (BBL) CONSTRUCTION PLANS, AND ON OBSERVATIONS DURING A SITE VISIT BY BBL PERSONNEL ON DECEMBER 3, 1997.
 2. SITE BOUNDARY IS APPROXIMATE.
 3. NOT ALL PHYSICAL FEATURES SHOWN.
 4. SOIL SAMPLES WERE OR WILL BE ANALYZED FOR THEIR CONSTITUENTS, INDICATED IN PARENTHESES. THE CONSTITUENT GROUPS ARE:
 V = VOLATILE ORGANIC COMPOUNDS (VOCs)
 SV = SEMI-VOLATILE ORGANIC COMPOUNDS (SVOCs)
 P = POLYCHLORINATED DIBENZO-F-DIOXINS (PCDFs) AND POLYCHLORINATED DIBENZOFURANS (PCDFs)
 H = HORGANICS
 PCB = POLYCHLORINATED BIPHENYLS (PCBs)
 L = LEAD ONLY
 5. PARCELS 19-4-25 AND 19-4-201 ARE UNDER COMMON OWNERSHIP AND WILL BE CONSIDERED AS A SINGLE PROPERTY DURING REMOVAL DESIGN/REMOVAL ACTION EVALUATIONS.



GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
LYMAN STREET AREA

**SUMMARY OF SUPPLEMENTAL SOIL
SAMPLE LOCATIONS**

BBL
BLISS AND BOUCK & LEE, INC.
REGISTERED ENGINEERS

FIGURE
1

E: 4012482.DWG
 L: 04/11/01 OFF+REPT. EASEMENT, FLOOD, & PLOT
 & PLOT PAVED PHOTO FROM 1990. TRUNK
 8.10-840 INDUSTRIAL SHADE-PAVED-BOUND. 1000
 P: PAGESET/PLT-DL
 8/5/03 5:01:05 PM L.P. DAN ROE
 N:\012400\4012482.DWG