



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

August 1, 2001

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
Newell Street Area I (GEC440)
Parcel J9-23-26 (Lakewood Playground) – Report on Additional Soil Sampling Results**

Dear Mr. Olson:

This letter report provides the results of additional soil investigations recently performed by the General Electric Company (GE) at one property within and adjacent to Newell Street Area I - specifically, the Lakewood Playground (Parcel J9-23-26). These investigations involved sampling and analysis for arsenic in the soil at this property. This letter also presents all available arsenic data from this property and includes an evaluation of the need for additional soil sampling for arsenic at this property.

Background

Soil investigations were initially conducted at Parcel J9-23-26 as part of the pre-design soil investigations performed by GE at Newell Street Area I in accordance with GE's *Addendum to Pre-Design Investigation Work Plan for the Newell Street Area I Removal Action*, which was submitted to the U.S. Environmental Protection Agency (EPA) on December 1, 2000, and conditionally approved by EPA on January 11, 2001. That initial investigation indicated the detection of arsenic in two surface soil samples at this property at concentrations that exceed the threshold set forth in the Massachusetts Contingency Plan (MCP) for reporting a potential Imminent Hazard for arsenic (40 ppm) (310 CMR 40.0321(2)(b)). Those samples consisted of surface soil samples from locations J9-23-26-C-24 (41.8 ppm) and J9-23-26-E-23 (85.6 ppm). Upon learning of these results, GE notified the Massachusetts Department of Environmental Protection (MDEP) on March 13, 2001, of a potential Imminent Hazard (as defined in the MCP) at these locations, and prepared a proposal to further assess the presence of arsenic in this area. Those investigations were proposed to EPA in a letter dated April 9, 2001 (approved by EPA on April 12, 2001) and were performed on May 7, 2001. GE provided the results of those additional investigations to EPA in a letter dated June 19, 2001. However, arsenic concentrations in two of the soil samples collected on May 7, 2001 were in excess of the MCP Method 1 S-1 soil standard for arsenic of 30 ppm. In response, GE proposed, in its June 19, 2001 letter, to collect additional soil samples to further delineate the presence of arsenic within Parcel J9-23-26. This proposal was conditionally approved by EPA in a letter dated June 28, 2001. GE collected the additional soil samples on July 3, 2001. As required by EPA's conditional approval letter of June 28, 2001, GE provided the preliminary results from that sampling event to EPA and MDEP within 10 days of the sample collection - i.e., on July 13, 2001. Those results are discussed below, along with an overall summary of all arsenic data at this property.

Recent Soil Investigations

In accordance with its June 19, 2001 letter, GE collected 18 additional surface and near-subsurface soil samples on July 3, 2001. Nine of those samples were initially analyzed for arsenic, while the remaining nine samples were held by the laboratory for potential analysis if the results of initial sampling showed arsenic concentrations above the MCP Method 1 S-1 soil standard. None of the initially analyzed samples contained such concentrations, so analysis of the remaining samples was not performed. The results of this recent sampling, together with all prior arsenic sampling results for Parcel J9-23-26 (as well as an adjacent sampling location on Parcel J9-23-25), are presented on Figure 1, along with an illustration of the sample locations.

Overview of Arsenic Soil Data

As noted above, all available arsenic data for Parcel J9-23-26 are shown on Figure 1. All these data have been validated in accordance with GE's approved *Field Sampling Plan/Quality Assurance Project Plan* and have found to be of acceptable quality for use in response action evaluations for Newell Street Area I, as discussed in Attachment 1 to GE's *Supplemental Data Validation/Assessment Report* for Newell Street Area I, which was submitted to EPA on July 25, 2001.

Based on review of these data, GE has delineated the presence of arsenic within Parcel J9-23-26 at concentrations above the MCP Method 1 S-1 soil standard. Arsenic at levels above the Method 1 S-1 soil standard is confined to certain limited locations and depth increments at Parcel J9-23-26. These locations and depth increments are limited to: J9-23-26-C-24 (0- to 1-foot depth increment, 41.8 ppm); J9-23-26-D-24 (0- to 1-foot depth increment, 39.2 ppm); and J9-23-26-E-23 (0- to 1-foot and 1- to 3-foot depth increments, 85.6 and 60.1 ppm, respectively).

GE does not know the source of the arsenic in soil at Parcel J9-23-26. Based on current information, there is no evidence to tie the presence of arsenic in soil at this property to releases or fill material from the GE facility. Hence, GE reserves the right to contest liability for the presence of arsenic at this property.

Future Activities

GE has evaluated the need for further soil sampling for arsenic at Parcel J9-23-26. Based on review of all available arsenic data, including the results of the latest sampling, there is no need for further arsenic sampling at this property, since the available data have delineated the extent of arsenic at concentrations exceeding the MCP Method 1 S-1 soil standard. GE will incorporate the arsenic sampling results from this property in its response action evaluations to be developed and included in the Conceptual Removal Design/Removal Action Work Plan for the Newell Street Area I Removal Action.

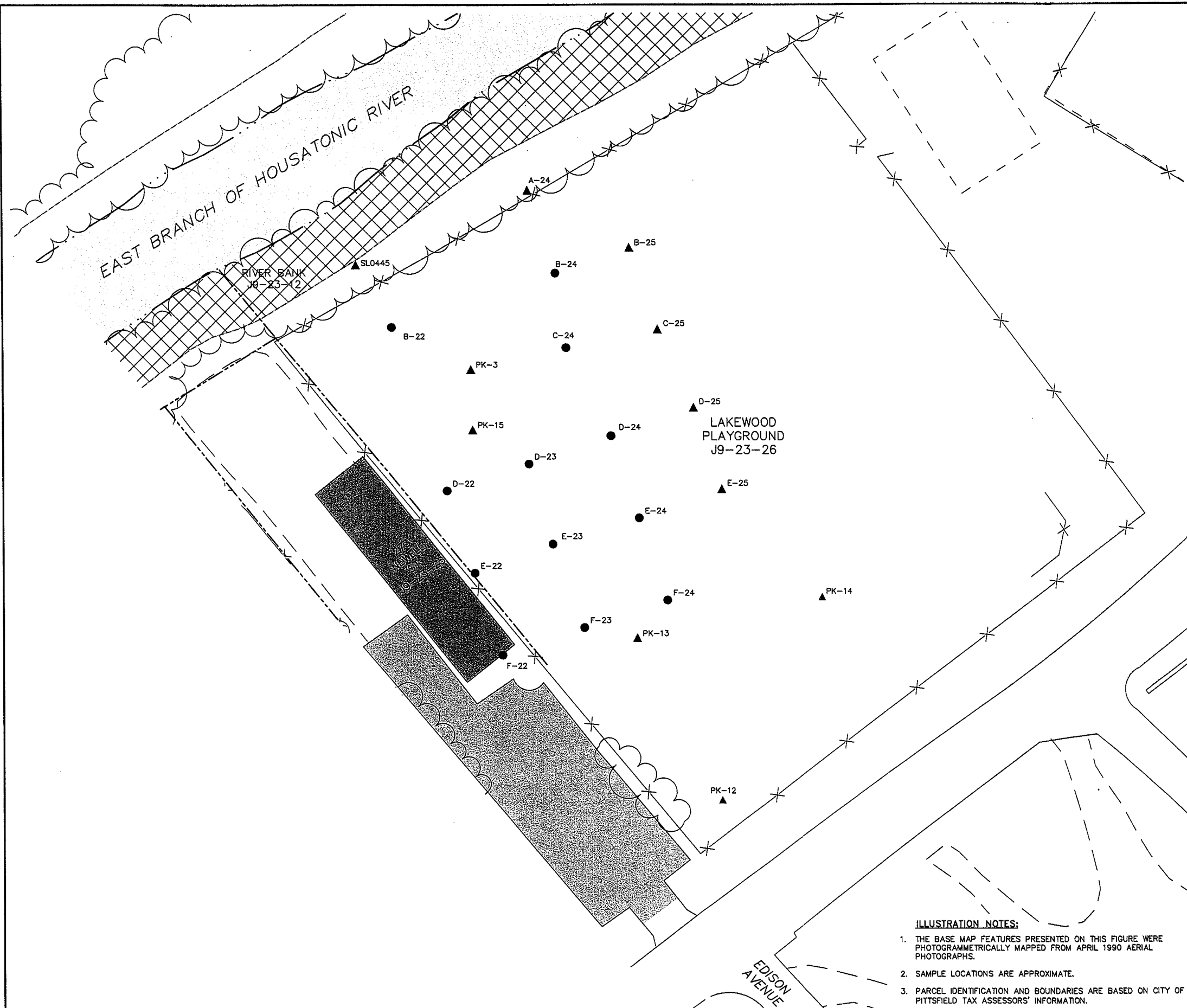
Please call Richard Gates or me if you have any questions regarding this report.

Sincerely,



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

cc: M. Nalipinski, EPA
T. Conway, EPA (w/o attachment)
H. Inglis, EPA
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Public Information Repositories
GE Internal Repositories



LEGEND

- APPROXIMATE PARCEL BOUNDARY
- J9-23-23 PARCEL ID
- x-x- FENCE LINE
- ▲ C-25 SURFACE SOIL SAMPLE LOCATION WITH ARSENIC ANALYSIS
- D-24 SURFACE/SUBSURFACE SOIL SAMPLE LOCATION WITH ARSENIC ANALYSIS
- BUILDINGS
- ▨ PAVED AREAS
- ▩ AREA TO BE ADDRESSED AS PART OF 1/2-MILE REACH

TABLE 1: SUMMARY OF EXISTING ARSENIC DATA

Sample ID	Sample Depth (Feet)	Date Collected	Arsenic Concentration (ppm)
PK-3	0-1	5/7/01	8.5
PK-12	0-0.5	5/9/91	6.30 AN**
PK-13	0-0.5	5/9/91	5.00
PK-14	0-0.5	5/9/91	9.10 N
PK-15	0-0.5	5/9/91	7.00
J9-23-25-F-22	1-3	2/5/01	7.20 L
J9-23-26-A-24	0-1	2/9/01	6.30
J9-23-26-B-22	6-15	2/8/01	7.80
J9-23-26-B-24	0-1	5/7/01	13.5
J9-23-26-B-24	1-3	2/8/01	10.1
J9-23-26-B-24	3-6	2/8/01	11.0
J9-23-26-B-25	0-1	5/7/01	7.80 [17.1]
J9-23-26-C-24	0-1	2/8/01	41.8
J9-23-26-C-24	1-3	5/7/01	7.40
J9-23-26-C-25	0-1	5/7/01	8.00
J9-23-26-D-22	0-1	7/3/01	5.00
J9-23-26-D-22	1-3	7/3/01	4.70
J9-23-26-D-22	3-6	2/8/01	7.40
J9-23-26-D-23	0-1	5/7/01	5.40
J9-23-26-D-23	1-3	7/3/01	4.50
J9-23-26-D-24	0-1	5/7/01	39.2
J9-23-26-D-24	1-3	5/7/01	9.90
J9-23-26-D-25	0-1	7/3/01	7.80
J9-23-26-E-22	0-1	5/7/01	4.90
J9-23-26-E-22	1-3	7/3/01	3.60
J9-23-26-E-23	0-1	2/9/01	85.6
J9-23-26-E-23	1-3	5/7/01	60.1
J9-23-26-E-23	3-6	7/3/01	8.80 [9.60]
J9-23-26-E-24	0-1	5/7/01	10.0
J9-23-26-E-24	1-3	7/3/01	8.90
J9-23-26-E-25	0-1	7/3/01	8.20
J9-23-26-F-23	0-1	5/7/01	6.40
J9-23-26-F-23	1-3	7/3/01	5.00
J9-23-26-F-24	0-1	5/7/01	7.20
J9-23-26-F-24	1-3	5/7/01	4.80
J9-23-26-SLO445	0-1	2/9/01	8.50

- Table Notes:
- Duplicate sample results are presented in brackets.
 - A - Results reported from single-point method-of-standard addition calculation.
 - N - Indicates sample matrix spike analysis was outside control limits.
 - L - Indicates laboratory duplicate analysis was outside control limits.
 - ** - Indicates sample matrix duplicate was outside control limits.



- ILLUSTRATION NOTES:**
- THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
 - SAMPLE LOCATIONS ARE APPROXIMATE.
 - PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
PARCEL J9-23-26

**SUMMARY OF ARSENIC
SOIL SAMPLE RESULTS**

BBL BLASLAND, BOUCK & LEE, INC.
engineers & scientists

FIGURE
1

X: 10112X01.DWG
L: ON=*, OFF=REF
P: PLT DL2B
8/1/01 SYR-S4-JER PGL RCA
10112001/10112P21.DWG