Corporate Environmental Programs
General Electric Company
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Transmitted via Federal Express

July 3, 2002

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
Newell Street Area I (GECD440)
Proposal for Supplemental Pre-Design Soil Investigations

Dear Mr. Olson:

In January 2002, the General Electric Company (GE) submitted the *Conceptual Removal Design/Removal Action Work Plan for Newell Street Area I* (Conceptual RD/RA Work Plan or Work Plan) to the U.S. Environmental Protection Agency (EPA). In that document, GE presented a series of evaluations related to the need for and scope of response actions to address PCB and non-PCB constituents in soil at the Newell Street Area I Removal Action Area (RAA). In that document, GE also proposed several additional soil sampling activities to supplement and/or complete the evaluations presented therein. Specifically, Section 5 of the Conceptual RD/RA Work Plan provided details regarding the collection of additional samples for analysis of PCBs or the constituents listed in Appendix IX of 40 CFR 264 (excluding pesticides and herbicides), plus benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine (Appendix IX+3). Based on subsequent discussions with EPA and the Massachusetts Department of Environmental Protection (MDEP), and in accordance with EPA's May 24, 2002 letter providing comments on the Conceptual RD/RA Work Plan, several additional PCB and Appendix IX+3 data needs were identified beyond those previously identified in the Work Plan. This letter describes the supplemental soil investigations proposed by GE for the Newell Street Area I RAA to address the remaining data needs and support future RD/RA activities.

To supplement this letter, GE has prepared tables and figures to summarize the proposed supplemental investigations. The proposed PCB soil sampling locations and depth intervals are presented on Figure 1, along with 50-foot-wide bands centered along the length of the two main utilities (i.e., the sanitary sewer line which is located across the back of the RAA and the stormwater drain line located along the property boundary between Parcels J9-23-18 and J9-23-19). These bands are included on Figure 1 to facilitate the evaluations required by Comment 8 of EPA's May 24, 2002 comment letter. Table 1 provides a summary of the number and distribution of existing and proposed Appendix IX+3 soil samples at Newell Street Area I on a parcel-specific basis, including information regarding the amount of Appendix IX+3 data that are and will be available to support future evaluations. The proposed Appendix IX+3 soil sampling locations for the 0- to 1-foot, 1- to 3-foot, 3- to 6-foot, and, 6- to 15-foot depth increments are depicted on Figures 2 through 5, respectively.

The remainder of this letter provides additional details regarding GE's proposal for supplemental investigations to address remaining PCB and Appendix IX+3 data needs. Certain general issues are addressed first, followed by GE's proposal for supplemental sampling on a parcel-specific basis.

GENERAL COMMENTS

EPA's May 24, 2002 comment letter on the Work Plan included general comments and recommendations regarding how the data for Newell Street Area I are to be evaluated. A number of these comments are relevant to this supplemental sampling proposal. Specifically, EPA's Comment 15 states that Appendix IX+3 samples collected "in close proximity" to one another should only be counted as one Appendix IX+3 sample for purposes of the required evaluations (EPA cited as an example locations QP-22 and QP-23 on Parcel J9-23-16, which are located within 25 feet of each other). To take account of this comment, for purposes of the assessment of the numbers and distribution of existing and proposed Appendix IX+3 samples (as presented in Table 1) and the evaluation of additional Appendix IX+3 data needs, multiple samples located within 25 feet of each other on a single property were counted as only one sample. EPA's Comment 15 also indicates that Appendix IX+3 samples that were not analyzed for the full constituent list should not be considered as meeting the Appendix IX+3 characterization requirements for constituents for which they were not analyzed. To reflect this comment, in Table 1 and the evaluation of Appendix IX+3 data needs, prior samples were counted only for the constituents for which they were analyzed.

In addition, Comment 1 of EPA's May 24, 2002 letter requires GE to propose resampling at select representative locations for certain volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) for which the prior analytical results were non-detect but had elevated detection limits. As described in the Conceptual RD/RA Work Plan, there were a number of such constituents which were not detected, but where the detection limits were sufficiently high (generally above the Practical Quantitation Limits) that one-half the detection limits exceeded the Preliminary Remediation Goals (PRGs) used for screening purposes under the procedures set forth in the *Statement of Work for Removal Actions Outside the River* (SOW).

To address this issue, GE is proposing to resample for the non-detected constituents with elevated detection limits at 12 representative locations/depths in this RAA. These locations/depths were selected by first identifying, for each such constituent, the existing samples with the highest 10% of detection limits. The proposed locations/depths to be resampled were then selected from those sample locations, with an effort to select locations/depths where numerous constituents had elevated detection limits and to ensure that the location with the highest detection limit for each constituent would be resampled. At these locations/depths, GE proposes to resample for the non-detected VOCs/SVOCs that previously had elevated detection limits where one-half those limits exceeded the PRGs, in an effort to achieve the Practical Quantitation Limits. The specific locations and depths where GE is proposing such resampling and the specific VOCs and SVOCs to be analyzed for in each such sample are listed in Table 2. These locations and depths are also identified in the parcel-specific discussions provided below. In those discussions, "Select VOCs, SVOCs" means the constituents listed, for the relevant sample, in Table 2.

PARCEL J9-23-12

Supplemental PCB Soil Sampling: As required by Comment 8 of EPA's May 24, 2002 letter, GE has identified two areas in the vicinity of the existing sanitary sewer line (located along the northern portion of Newell Street Area I) where additional PCB soil data are necessary to characterize the soils associated with the utility corridor. To achieve a spacing of one sample per 100 to 150 linear feet within a 50-foot band centered along the pipeline (and to depths corresponding to the utility trench bedding), GE proposes the collection of additional PCB samples at the following locations and depth increments:

Sample ID	Depth Increment
SLO083	10-15'
SLO466	3-6', 6-10', 10-15'

Supplemental Appendix IX+3 Soil Sampling: In accordance with Comment 10 of EPA's May 24, 2002 letter, additional samples are required to characterize the 1- to 3-foot depth increment. In addition, GE is proposing to resample two locations from the 0- to 1-foot depth increment for select VOCs/SVOCs to address elevated detection limits, as shown in Table 2. The proposed Appendix IX+3 sample locations for Parcel J9-23-12 are presented on Figures 2 and 3 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-12-C12	0-1'	Detection Limits	Select VOCs, SVOCs
J9-23-12-C12	1-3'	Characterization	SVOCs, Dioxins/Furans, Inorganics
SLO083	1-3'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
SLO093	0-1'	Detection Limits	Select VOCs, SVOCs
SLO466	1-3'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics

PARCEL J9-23-13

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: To address Comment 5 of EPA's May 24, 2002 letter, GE proposes to collect additional samples to delineate the extent of elevated lead concentrations detected at sample locations J9-23-12-D4 (1- to 3-foot depth increment) and J9-23-13-D5 (0- to 1-foot depth increment). (Additional lead delineation samples for location J9-23-13-D5 are proposed at Parcel J9-23-16, as discussed below.) The proposed Appendix IX+3 sample locations for Parcel J9-23-13 are presented on Figures 2 and 3 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
MM-13	1-3'	Delineation	Lead
MM-14	0-1' & 1-3'	Delineation	Lead
MM-15	1-3'	Delineation	Lead
MM-16	0-1' & 1-3'	Delineation	Lead

PARCEL J9-23-16

Supplemental PCB Soil Sampling: The Conceptual RD/RA Work Plan proposed the collection of additional soil samples for analysis of PCBs in soils located beneath the existing building at Parcel J9-23-16. These samples are proposed to satisfy the grid-based sampling requirements specified in the SOW in the event that GE performs demolition of the existing building at some point in the future. As illustrated on Figure 1, GE proposes to collect additional samples for PCB analysis at the following locations and depth increments, to the extent feasible:

Sample ID	Depth Increment
J9-23-16-H6	0-1', 1-3', 3-6', 6-10' & 10-15'
J9-23-16-I6	0-1'

It should be noted, however, that it may not be feasible to get a drill rig inside the existing building at this parcel to drill the boring proposed for location J9-23-16-H6. If it is not feasible to do so, GE will either: (a) install the boring manually if that can be done to the specified depth; or (b) if that is not possible,

install a soil boring outside the building at a location as close as practicable to the location proposed inside the building and collect the soil samples from that boring.

Supplemental Appendix IX+3 Soil Sampling: To address Comment 5 of EPA's May 24, 2002 letter, GE proposes to collect additional samples to delineate the extent of elevated lead concentrations at sample locations J9-23-13-D5 (0- to 1-foot depth increment), J9-23-16-D6 (1- to 3-foot depth increment), QP-22 (4- to 8-foot depth increment) and QP-27 (4- to 6-foot depth increment). In addition, based on the concentrations of lead observed at sample location QP-23 (0- to 4-foot, and 4- to 8-foot depth increments), GE proposes the collection of additional samples to assess the presence of lead in the vicinity of that sample location. Further, to address Comment 7 of EPA's May 24, 2002 letter, GE proposes to collect one additional sample from the 6- to 15-foot depth increment for Appendix IX+3 analyses. That sample will be collected from location J9-23-16-H6 (which is inside the building) if it is feasible to install a boring to 15 feet at that location. However, if it is not feasible to do so (as discussed above), GE will collect that sample from the same replacement soil boring outside the building at which the required PCB samples will be collected. Finally, GE is proposing to resample one location (QP-27) from the 4- to 6-foot depth increment for select VOCs/SVOCs to address elevated detection limits, as shown in Table 2. The proposed Appendix IX+3 sample locations for Parcel J9-23-16 are presented on Figures 2 thorough 5 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-16-H6	6-15'	Characterization	VOCs*, SVOCs, Dioxins/Furans, Inorganics
QP-15	1-3'	Delineation	Lead
QP-19	0-1' & 1-3'	Delineation	Lead
QP-26	1-3'	Delineation	Lead
QP-27	4-6'	Detection Limits	Select VOCs, SVOCs
QP-31	0-1' & 1-3'	Delineation	Lead
QP-33	0-1', 1-3', 3-6', 6-8'	Delineation	Lead
QP-34	0-1', 1-3', 3-6', 6-8'	Delineation	Lead
QP-35	0-1', 1-3', 3-6', 6-8'	Delineation	Lead

*The 2-foot sample increment with the highest PID reading will be submitted for VOC analysis.

PARCEL J9-23-17

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: During validation of the pre-design soil data collected at Parcel J9-23-17, GE noted laboratory deficiencies that resulted in the rejection of the majority of the dioxin/furan data. As a result, the Conceptual RD/RA Work Plan proposed the collection of eight samples from four sample locations (IA-43, IA-63, IA-72, and IA-82) for dioxin/furan analysis. Comment 7 of EPA's May 24, 2002 letter required that the sample proposed for location IA-43 be relocated to a previously unsampled location approximately 35 feet to the south, and also requested the collection of additional dioxin/furan samples from the 3- to 6-foot, and 6- to 15-foot depth increments at the proposed locations. In addition, based on recent conversations with EPA, GE has elected to relocate the sample proposed for the 1- to 3-foot depth increment at location IA-63 to IA-102.

To satisfy Comment 5 of EPA's letter, GE proposes to collect additional soil samples to delineate the extent of elevated lead concentrations detected at sample location IA-98 (3- to 6-foot, and 6- to 15-foot depth increments). Further, to address Comment 15 of EPA's letter, GE has reviewed the distribution of Appendix IX+3 soil samples at this property and proposes to collect an additional sample from the 1- to 3-foot depth increment at location IA-82 for Appendix IX+3 analysis.

GE has elected to combine some of the sampling to address the aforementioned EPA comments. For example, the requested 3- to 6-foot, and 6- to 15-foot dioxin/furan characterization samples will be collected at the same locations where the lead delineation samples for IA-98 will be collected.

Finally, GE is proposing to resample the 3- to 6-foot, and 6- to 15-foot depth increments at one location (IA-98) for select VOCs/SVOCs to address elevated detection limits, as shown in Table 2.

The proposed Appendix IX+3 sample locations for Parcel J9-23-17 are presented on Figures 2 through 5 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
IA-40	0-1', 1-3', 3-6', 6-8'	Delineation	Lead
IA-63	0-1'	Characterization	Dioxins/Furans
IA-72	0-1' & 1-3'	Characterization	Dioxins/Furans
IA-82	0-1'	Characterization	Dioxins/Furans
IA-82	1-3'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
IA-97	3-6' & 6-15'	Characterization	Dioxins/Furans
IA-97	3-6' & 6-15'	Delineation	Lead
IA-98	3-6' & 6-15'	Detection Limits	Select VOCs, SVOCs
IA-101	3-6' & 6-15'	Characterization	Dioxins/Furans
IA-101	3-6' & 6-15'	Delineation	Lead
IA-102	1-3'	Characterization	VOCs, Dioxins/Furans
IA-110	0-1', 1-3', 3-6', 6-15'	Characterization	Dioxins/Furans
IA-110	3-6' & 6-15'	Delineation	Lead

PARCEL J9-23-18

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: As discussed in the Conceptual RD/RA Work Plan, no Appendix IX+3 data are currently available to characterize soils in the 1- to 6-foot depth increment at Parcel J9-23-18. As a result, GE proposed the collection of samples from the 1- to 3-foot, and 3- to 6-foot depth increments at sample locations J9-23-18-H11 and RV-9 for Appendix IX+3 analyses. EPA's parcel-specific comment for this property requested the relocation of the proposed samples for location RV-9 to location RV-1. In addition, to address Comment 5 of EPA's May 24, 2002 letter, GE proposes to collect additional samples on this parcel to delineate the extent of elevated lead concentrations at sample location J9-23-17-IA-98 (3- to 6-foot, and 6- to 15-foot depth increments) on Parcel J9-23-17. Finally, GE is proposing to resample one location (RV-9) from the 10- to 12-foot depth increment for select VOCs/SVOCs to address elevated detection limits, as shown in Table 2. The proposed Appendix IX+3 sample locations for Parcel J9-23-18 are presented on Figures 3 through 5 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-18-H11	1-3' & 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
RV-1	1-3' & 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
RV-2	3-6' & 6-15'	Delineation	Lead
RV-9	10-12'	Detection Limits	Select VOCs, SVOCs

PARCEL J9-23-19

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property. However, the parcel-specific comments for this property require the determination of what utilities are present on the property and a subsequent utility evaluation, if appropriate. GE proposes to perform a field investigation to determine the presence of utilities at this property during performance of the supplemental sampling activities for Appendix IX+3 constituents, described below. Upon determining the presence of such utilities, GE will perform any required utility corridor evaluations and incorporate the results of such evaluations in the forthcoming Addendum to the Conceptual RD/RA Work Plan.

Supplemental Appendix IX+3 Soil Sampling: As discussed in the Conceptual RD/RA Work Plan, the collection of additional Appendix IX+3 data is proposed to support evaluations concerning the extent of soil removal necessary to address elevated SVOC concentrations associated with sample locations J9-23-19-H13 (0- to 1-foot depth increment) and J9-23-19-I13 (0- to 1-foot depth increment) and elevated concentrations of SVOCs and lead at sample location J9-23-19-H12 (1- to 3-foot depth increment). In addition, GE is proposing to resample one location from the 0- to 1-foot depth increment and two locations from the 1- to 3-foot depth increment for select VOCs/SVOCs to address elevated detection limits, as shown in Table 2. The proposed Appendix IX+3 sample locations for Parcel J9-23-19 are presented on Figures 2 and 3 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-19-F12	1-3'	Detection Limits	Select VOCs, SVOCs
J9-23-19-H12	1-3'	Detection Limits	Select VOCs, SVOCs
J9-23-19-H13	0-1'	Detection Limits	Select VOCs, SVOCs
SZ-31	1-3'	Delineation	SVOCs, Lead
SZ-32	1-3'	Delineation	SVOCs, Lead
SZ-33	1-3'	Delineation	SVOCs, Lead
SZ-34	1-3'	Delineation	SVOCs, Lead
SZ-34	0-1'	Delineation	SVOCs
SZ-35	0-1'	Delineation	SVOCs
SZ-36	0-1'	Delineation	SVOCs
SZ-37	0-1'	Delineation	SVOCs

PARCEL J9-23-20

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: In accordance with Comment 15 of EPA's May 24, 2002 letter, GE has reviewed the distribution of Appendix IX+3 soil samples at this property and is proposing the collection of an additional sample to characterize the 0- to 1-foot depth increment at this property. The proposed Appendix IX+3 sample location for Parcel J9-23-20 is presented on Figure 2 and consists of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-20-F14	0-1'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics

PARCEL J9-23-21

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: As discussed in Section 5 of the Conceptual RD/RA Work Plan, no Appendix IX+3 data exist to characterize soils in the 1- to 6-foot depth increment at Parcel J9-23-21. As a result, GE proposed the collection of samples from the 1- to 3-foot, and 3- to 6-foot depth increments at sample locations J9-23-21-D15 and J9-23-21-I15 for Appendix IX+3 analyses. In addition, EPA's comments related to Parcel J9-23-21 require the collection of two additional Appendix IX+3 samples at sample location SZ-19 (1- to 3-foot, and 3- to 6-foot depths) for analysis of Appendix IX+3 constituents to better characterize the 1- to 6-foot depth increment in the central portion of this property. Finally, to address Comment 15 of EPA's May 24, 2002 letter, GE has reviewed the distribution of Appendix IX+3 soil samples at this property and is proposing the collection of an additional sample to characterize the 0- to 1-foot depth increment at this property. The proposed Appendix IX+3 sample locations for Parcel J9-23-21 are presented on Figures 2 through 4 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-21-D15	0-1', 1-3' & 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
J9-23-21-I15	1-3' & 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
SZ-19	1-3' & 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics

PARCEL J9-23-22

Supplemental PCB Soil Sampling: The Conceptual RD/RA Work Plan proposed the collection of additional samples from the 1- to 6-foot depth increment for analysis of PCBs to delineate the extent of soil removal associated with sample location J9-23-22-J18. As illustrated on Figure 1, GE proposes to collect the following additional samples:

Sample ID	Depth Increment
J9-23-22-K18	1 -3' & 3-6'

Supplemental Appendix IX+3 Soil Sampling: As discussed in the Conceptual RD/RA Work Plan, no Appendix IX+3 data exist to characterize soils in the 6- to 15-foot depth increment at Parcel J9-23-22. As a result, GE proposed the collection of samples from that depth increment at locations J9-23-12-D16 and J9-23-22-H16 for Appendix IX+3 analyses. However, EPA's comments for this property requested the relocation of the sample proposed for location J9-23-22-D16 to location J9-23-22-C16. In addition, in response to Comment 15 of EPA's May 24, 2002 letter, GE has reviewed the distribution of Appendix IX+3 soil samples at this property and proposes the collection of additional soil samples from the 1- to 3-foot, and/or 3- to 6-foot depth increments at sample locations J9-23-22-C16 and J9-23-22-F16. Finally, GE is proposing to resample one location (J18) from the 1- to 3-foot depth increment for select VOCs/SVOCs to address elevated detection limits, as shown in Table 2. The proposed Appendix IX+3 sample locations for Parcel J9-23-22 are presented on Figures 3 through 5 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-22-C16	1-3'	Characterization	VOCs, SVOCs, Dioxins/Furans
J9-23-22-C16	6-15'	Characterization	VOCs*, SVOCs, Dioxins/Furans, Inorganics
J9-23-22-F16	1-3', 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
J9-23-22-H16	6-15'	Characterization	VOCs*, SVOCs, Dioxins/Furans, Inorganics
J9-23-22-J18	1-3'	Detection Limits	Select VOCs, SVOCs

*The 2-foot sample increment with the highest PID reading will be submitted for VOC analysis.

PARCEL J9-23-23

Supplemental PCB Soil Sampling: The Conceptual RD/RA Work Plan proposed the collection of additional soil samples for analysis of PCBs for soils present beneath the building at Parcel J9-23-23. These samples were proposed to satisfy the grid-based sampling requirements specified in the SOW in the event that future demolition of the existing building is performed. As illustrated on Figure 1, GE proposes to collect additional samples for PCB analysis at the following locations and depth increments, to the extent feasible:

Sample ID	Depth Increment
J9-23-23-F18B	0 -1', 1-3', 3-6', 6-10' & 10-15'
J9-23-23-G18B	0-1'
J9-23-23-H18B	0-1', 1-3', 3-6', 6-10' & 10-15'
J9-23-23-I19	0-1'

As at Parcel J9-23-16, it may not be feasible to get a drill rig inside the existing building at this parcel to drill the borings proposed for locations J9-23-23-F18B and -H18B. If it is not feasible to do so, GE will either: (a) install the borings manually if that can be done to the specified depth; or (b) if that is not possible, install soil borings outside the building at locations as close as practicable to the locations proposed inside the building and collect the samples from those borings.

Supplemental Appendix IX+3 Soil Sampling: In response to Comment 15 of EPA's May 24, 2002 letter, GE has reviewed the distribution of Appendix IX+3 soil samples at this property and proposes the collection of additional soil samples from the 0- to 1-foot, 1- to 3-foot, and/or 6- to 15-foot depth increments at sample locations J9-23-23-D18, J9-23-23-F18B and J9-23-23-I19 for analysis of certain Appendix IX+3 constituent groups, as listed below. In addition, GE is proposing to resample one location (H19) from the 0- to 1-foot depth increment for select VOCs/SVOCs to address elevated detection limits, as shown in Table 2. The proposed Appendix IX+3 sample locations for Parcel J9-23-22 are presented on Figures 2, 3 and 5 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-23-D18	6-15'	Characterization	VOCs*, SVOCs, Dioxins/Furans, Inorganics
J9-23-23-F18B	1-3'	Characterization	VOCs, SVOCs, Dioxins/Furans
J9-23-23-H19	0-1'	Detection Limits	Select VOCs, SVOCs
J9-23-23-I19	0-1'	Characterization	VOCs, SVOCs, Dioxins/Furans

*The 2-foot sample increment with the highest PID reading will be submitted for VOC analysis.

It should be noted, however, that if is not feasible to install a soil boring at location J9-23-23-F18B (which is inside the building), then the 1- to 3-foot sample proposed for that location will be collected from the same replacement soil boring outside the building at which the required PCB samples will be collected.

PARCEL J9-23-24

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: In response to Comment 15 of EPA's May 24, 2002 letter, GE has reviewed the distribution of Appendix IX+3 soil samples at this property and proposes the collection of additional soil samples from the 1- to 3-foot, and 3- to 6-foot depth increments at sample location J9-23-23-G20. In addition, GE is proposing to resample one location (H20) from the 6- to 8-foot depth increment for select VOCs/SVOCs to address elevated detection limits, as shown in Table 2. The

proposed Appendix IX+3 sample locations for Parcel J9-23-22 are presented on Figures 3 through 5 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-24-G20	1-3' & 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
J9-23-24-H20	6-8'	Detection Limits	Select VOCs, SVOCs

PARCEL J9-23-25

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: As discussed in the Conceptual RD/RA Work Plan, no Appendix IX+3 data exist to characterize soils in the 6- to 15-foot depth increment at Parcel J9-23-25. As a result, GE proposed in Section 5 of the Conceptual RD/RA Work Plan to collect samples from that depth at locations J9-23-25-D20 and J9-23-25-H22 for Appendix IX+3 analysis. However, EPA's parcel-specific comments require the relocation of the sample proposed for location J9-23-25-H22 to location J9-23-25-F22. The proposed Appendix IX+3 sample locations for Parcel J9-23-22 are presented on Figure 5 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-25-D20	6-15'	Characterization	VOCs*, SVOCs, Dioxins/Furans, Inorganics
J9-23-25-F22	6-15'	Characterization	VOCs*, SVOCs, Dioxins/Furans, Inorganics

*The 2-foot sample increment with the highest PID reading will be submitted for VOC analysis.

PARCEL J9-23-26

Supplemental PCB Soil Sampling: As required in Comment 8 of EPA's May 24, 2002 letter, GE has identified an area along the existing sanitary sewer utility line (located along the northern portion of Newell Street Area I) where additional PCB soil data are necessary to characterize the soils associated with the utility corridor. To achieve a spacing of one sample per 100 to 150 linear feet within a 50-foot band centered along the pipeline (and to depths corresponding to the utility trench bedding), GE proposes the collection of additional samples at the following location and depth increments for analysis of PCBs:

Sample ID	Depth Increment
SLO445	3 -6', 6-10' & 10-15'

Supplemental Appendix IX+3 Soil Sampling: In response to Comment 15 of EPA's May 24, 2002 letter, GE has reviewed the distribution of Appendix IX+3 soil samples at this property and proposes the collection of an additional soil sample from the 1- to 3-foot depth increment at sample location J9-23-26-E22. The proposed Appendix IX+3 sample location for Parcel J9-23-26 is presented on Figure 3 and consists of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-26-E22	1-3'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics

Proposed Schedule

Following receipt of EPA's written approval for the investigation activities proposed herein, GE anticipates that it will be able to complete the proposed sampling and analyses activities within approximately 60 days. Thereafter, GE believes that it will take approximately another 90 days to complete the revised evaluations incorporating the data from the investigations proposed herein.

Accordingly, GE proposes to submit an addendum to the Conceptual RD/RA Work Plan, which will include the results of this supplemental sampling proposal, as well as revised removal design/removal action evaluations, within 5 months of EPA's approval of the investigations proposed in this letter.

Please contact me with any questions or comments you have regarding this proposal.

Sincerely,

Richard Gates/GA

Richard Gates
Remediation Project Manager

Attachments
V:GE_CD_NSAI_Agr_01722415.doc

cc: Tim Conway, EPA
Holly Inglis, EPA
Michael Nalipinski, EPA
K.C. Mitkevicius, USACE
Dawn Jamros, Weston
Alan Weinberg, MDEP (cover letter only)
Robert Bell, MDEP (cover letter only)
Thomas Angus, MDEP (cover letter only)
Susan Keydel, MDEP
Nancy E. Harper, MA AG
Charles Fredette, CDEP (cover letter only)
Dale Young, MA EOEA
Mayor S. Hathaway, City of Pittsfield
Thomas Hickey, Director, PEDA
Pittsfield Department of Health
Michael Carroll, GE (cover letter only)
Andrew Silfer, GE
Rod McLaren, GE
James Bieke, Shea & Gardner
James Nuss, BBL
Jeffrey Bernstein, Bernstein, Cushner & Kimmel
Teresa Bowers, Gradient
Property Owner – 187 Newell Street
Property Owner – 203 Newell Street
Property Owner – 217 Newell Street
Property Owner – 221, 229, 230 Newell St.
Property Owner – 247/249 Newell Street
Property Owner – 269 Newell Street
Property Owner – 273 Newell Street
Cristobal Bonifaz, Esq.
Public Information Repositories
GE Internal Repository

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I RAA

APPENDIX IX+3 SAMPLE DISTRIBUTION

	Number of Samples Per Depth Increment								Number of Existing & Prop. Samples Per Evaluation Increment					Total Existing AIX+3 Samples	Total Existing & Proposed PCB Samples[1]	Existing AIX+3/PCB Sample Ratio	Total Existing & Proposed AIX+3 Samples	Revised AIX+3/PCB Sample Ratio	AIX+3 Sample Distribution	
	0 - 1'		1 - 3'		3 - 6'		6 - 15'													
Parcel ID/Analyses	Exist.	Prop.	Exist.	Prop.	Exist.	Prop.	Exist.	Prop.	0 - 1'	0 - 3'	1 - 3'	1 - 6'	0 - 15'						0 - 1'	1 - 15'
J9-23-12																				
VOCs	4	0	1	2	1	0	1	0	4	NA	3	NA	9	7	15	47%	9	60%	44%	56%
SVOCs	4	0	0	3	1	0	1	0	4	NA	3	NA	9	6		40%	9	60%	44%	56%
Dioxins/Furans	4	0	0	3	1	0	1	0	4	NA	3	NA	9	6		40%	9	60%	44%	56%
Inorganics	4	0	0	3	1	0	1	0	4	NA	3	NA	9	6		40%	9	60%	44%	56%
J9-23-13																				
VOCs	9	0	2	0	2	0	6	0	9	11	NA	4	19	19	54	35%	19	35%	47%	53%
SVOCs	8	0	2	0	2	0	5	0	8	10	NA	4	17	17		31%	17	31%	47%	53%
Dioxins/Furans	8	0	2	0	2	0	6	0	8	10	NA	4	18	18		33%	18	33%	44%	56%
Inorganics	9	0	2	0	2	0	6	0	9	11	NA	4	19	19		35%	19	35%	47%	53%
J9-23-16																				
VOCs	5	0	2	0	3	0	0	1	5	NA	NA	5	11	10	30	33%	11	37%	45%	55%
SVOCs	7	0	2	0	3	0	0	1	7	NA	NA	5	13	12		40%	13	43%	54%	46%
Dioxins/Furans	7	0	2	0	3	0	0	1	7	NA	NA	5	13	12		40%	13	43%	54%	46%
Inorganics	6	0	3	0	3	0	1	1	6	NA	NA	6	14	13		43%	14	47%	43%	57%
J9-23-17																				
VOCs	9	0	3	2	2	0	2	0	9	NA	5	NA	18	16	53	30%	18	34%	50%	50%
SVOCs	9	0	4	1	2	0	2	0	9	NA	5	NA	18	17		32%	18	34%	50%	50%
Dioxins/Furans	3	4	0	4	0	3	0	3	7	NA	4	NA	17	3		6%	17	32%	41%	59%
Inorganics	9	0	4	1	2	0	2	0	9	NA	5	NA	18	17		32%	18	34%	50%	50%
J9-23-18																				
VOCs	4	0	0	2	0	2	3	0	4	6	NA	4	11	7	8	88%	11	138%	36%	64%
SVOCs	4	0	0	2	0	2	3	0	4	6	NA	4	11	7		88%	11	138%	36%	64%
Dioxins/Furans	4	0	0	2	0	2	3	0	4	6	NA	4	11	7		88%	11	138%	36%	64%
Inorganics	4	0	0	2	0	2	3	0	4	6	NA	4	11	7		88%	11	138%	36%	64%
J9-23-19																				
VOCs	6	0	2	0	1	0	1	0	6	8	NA	3	10	10	31	32%	10	32%	60%	40%
SVOCs	6	0	2	0	1	0	1	0	6	8	NA	3	10	10		32%	10	32%	60%	40%
Dioxins/Furans	6	0	2	0	1	0	1	0	6	8	NA	3	10	10		32%	10	32%	60%	40%
Inorganics	7	0	2	0	1	0	1	0	7	9	NA	3	11	11		35%	11	35%	64%	36%
J9-23-20																				
VOCs	1	1	1	0	3	0	3	0	2	3	NA	4	9	8	23	35%	9	39%	22%	78%
SVOCs	2	1	1	0	3	0	3	0	3	4	NA	4	10	9		39%	10	43%	30%	70%
Dioxins/Furans	2	1	1	0	3	0	3	0	3	4	NA	4	10	9		39%	10	43%	30%	70%
Inorganics	2	1	1	0	3	0	3	0	3	4	NA	4	10	9		39%	10	43%	30%	70%

See Notes on Page 2.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I RAA

APPENDIX IX+3 SAMPLE DISTRIBUTION

	Number of Samples Per Depth Increment								Number of Existing & Prop. Samples Per Evaluation Increment					Total Existing AIX+3	Total Existing & Proposed	Existing AIX+3/PCB	Total Existing & Proposed	Revised AIX+3/PCB	AIX+3 Sample Distribution	
	0 - 1'		1 - 3'		3 - 6'		6 - 15'													
Parcel ID/Analyses	Exist.	Prop.	Exist.	Prop.	Exist.	Prop.	Exist.	Prop.	0 - 1'	0 - 3'	1 - 3'	1 - 6'	0 - 15'	Samples	PCB Samples[(1)]	Sample Ratio	AIX+3 Samples	Sample Ratio	0 - 1'	1 - 15'
J9-23-21																				
VOCs	2	1	0	3	0	3	1	0	3	6	NA	6	10	3	14	21%	10	71%	30%	70%
SVOCs	2	1	0	3	0	3	1	0	3	6	NA	6	10	3		21%	10	71%	30%	70%
Dioxins/Furans	2	1	0	3	0	3	1	0	3	6	NA	6	10	3		21%	10	71%	30%	70%
Inorganics	2	1	0	3	0	3	1	0	3	6	NA	6	10	3		21%	10	71%	30%	70%
J9-23-22																				
VOCs	6	0	1	2	1	1	0	2	6	9	NA	5	13	8	31	26%	13	42%	46%	54%
SVOCs	4	0	1	2	1	1	0	2	4	7	NA	5	11	6		19%	11	35%	36%	64%
Dioxins/Furans	4	0	1	2	1	1	0	2	4	7	NA	5	11	6		19%	11	35%	36%	64%
Inorganics	5	0	1	1	1	1	0	2	5	7	NA	4	11	7		23%	11	35%	45%	55%
J9-23-23																				
VOCs	3	1	2	1	2	0	2	1	4	NA	NA	5	12	9	36	25%	12	33%	33%	67%
SVOCs	4	1	2	1	2	0	2	1	5	NA	NA	5	13	10		28%	13	36%	38%	62%
Dioxins/Furans	4	1	2	1	2	0	2	1	5	NA	NA	5	13	10		28%	13	36%	38%	62%
Inorganics	3	0	3	0	3	0	2	1	3	NA	NA	6	12	11		31%	12	33%	25%	75%
J9-23-24																				
VOCs	2	0	1	1	1	1	2	0	2	NA	NA	4	8	6	16	38%	8	50%	25%	75%
SVOCs	2	0	1	1	1	1	2	0	2	NA	NA	4	8	6		38%	8	50%	25%	75%
Dioxins/Furans	2	0	1	1	1	1	2	0	2	NA	NA	4	8	6		38%	8	50%	25%	75%
Inorganics	3	0	1	1	1	1	2	0	3	NA	NA	4	9	7		44%	9	56%	33%	67%
J9-23-25																				
VOCs	4	0	2	0	2	0	0	2	4	6	NA	4	10	8	30	27%	10	33%	40%	60%
SVOCs	4	0	2	0	2	0	0	2	4	6	NA	4	10	8		27%	10	33%	40%	60%
Dioxins/Furans	4	0	2	0	2	0	0	2	4	6	NA	4	10	8		27%	10	33%	40%	60%
Inorganics	4	0	2	0	2	0	0	2	4	6	NA	4	10	8		27%	10	33%	40%	60%
J9-23-26																				
VOCs	5	0	1	1	2	0	1	0	5	NA	2	NA	10	9	27	33%	10	37%	50%	50%
SVOCs	5	0	1	1	2	0	1	0	5	NA	2	NA	10	9		33%	10	37%	50%	50%
Dioxins/Furans	5	0	1	1	2	0	1	0	5	NA	2	NA	10	9		33%	10	37%	50%	50%
Inorganics	5	0	1	1	2	0	1	0	5	NA	2	NA	10	9		33%	10	37%	50%	50%

Notes:

1. The number of PCB samples represents the total number of samples required to satisfy the grid-based sampling approach specified in the CD.
2. Sample and sample duplicates are counted as one sample. Also, multiple samples collected from the same location & depth increment on different days are counted as one sample.
3. Multiple samples located within 25' of each other on a single property were counted as one sample only.
4. Samples proposed to delineate the extent of soil removal to address Appendix IX+3 constituents are not included in sample counts.

TABLE 2

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I RAA

SAMPLE LOCATIONS, DEPTHS, AND ANALYTES FOR SELECT VOCs/SVOCs ANALYSES

Parcel ID:	J9-23-12	J9-23-12	J9-23-16	J9-23-17	J9-23-17	J9-23-18	J9-23-19	J9-23-19	J9-23-19	J9-23-22	J9-23-23	J9-23-24
Proposed Sample Location:	**C-12**	**SLO093**	**QP-27**	**IA-98**	**IA-98**	**RV-9**	**F-12**	**H-12**	**H-13**	**J-18**	**H-19**	**H-20**
Proposed Sample Depth(Feet):	**0-1'**	**0-1'**	**4-6'**	**3-6'**	**6-15'**	**10-12'**	**1-3'**	**1-3'**	**0-1'**	**1-3'**	**0-1'**	**6-8'**
Volatile Organics												
1,1,2-Trichloroethane						X						
1,1-Dichloroethene						X					X	X
1,2,3-Trichloropropane	X	X		X	X	X	X	X	X			X
1,2-Dibromoethane												X
1,2-Dichloroethane						X					X	
1,2-Dichloropropane						X						
1,4-Dioxane						X					X	
Acrolein												X
Acrylonitrile												X
Benzene						X						
Bromodichloromethane						X						
Carbon Tetrachloride						X						
Chloroform						X					X	
Chloromethane						X					X	
cis-1,2-Dichloropropene						X						
trans-1,3-Dichloropropene						X						
Vinyl Chloride						X					X	X
Semivolatile Organics												
1,2-Diphenylhydrazine	X	X					X	X	X			
1,4-Dichlorobenzene							X	X	X			
2-Nitroaniline							X	X	X			
3,3'-Dichlorobenzidine							X	X	X			
3,3'-Dimethylbenzidine	X	X	X	X	X	X	X	X	X	X	X	X
3-Nitroaniline							X	X	X			
4-Chlorobenzilate							X	X	X			
4-Nitroaniline							X	X	X			
7,12-Dimethylbenz(a)anthracene	X	X	X	X	X	X	X	X	X		X	X
Acetophenone	X	X					X	X	X			
Aramite							X	X	X			
Benzidine	X	X	X	X	X	X	X	X	X	X	X	X
bis(2-Chloroethyl)ether	X	X				X	X	X	X			X
bis(2-Chloroisopropyl)ether							X	X	X			
Diallate							X	X	X			
Dibenzo(a,h)anthracene	X	X		X	X						X	
Hexachlorobenzene	X	X					X	X	X			
Hexachlorobutadiene							X	X	X			
Indeno(1,2,3-cd)pyrene	X	X										
Methapyrilene							X	X	X			
N-Nitrosodiethylamine	X	X	X	X	X	X	X	X	X	X	X	X
N-Nitrosodimethylamine	X	X	X	X	X	X	X	X	X	X	X	X
N-Nitroso-di-n-butylamine	X	X	X	X	X	X	X	X	X	X	X	X
N-Nitroso-di-n-propylamine	X	X		X	X	X	X	X	X			X
N-Nitrosomethylethylamine	X	X	X	X	X	X	X	X	X	X	X	X
N-Nitrosopyrrolidine	X	X					X	X	X			
o-Toluidine							X	X	X			
Pentachloronitrobenzene							X	X	X			
Pentachlorophenol	X	X					X	X	X			

NOTES:
1. The Appendix IX+3 constituents included on this table are ones that previously had non-detect sample results where 1/2 the detection limit exceeded the Preliminary Remediation Goal (PRG), but no detected concentrations exceeding the PRG.
2. **X**= indicates the constituents to be included in analysis of the proposed samples.

LEGEND

- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- EASEMENT
- J9-23-23 PARCEL ID
- TOP OF BANK
- DRAIN LINE
- SANITARY SEWER
- AREA TO BE ADDRESSED AS PART OF 1/2-MILE REACH
- ▲QP-30 OR ▲GE3 GE EXISTING SURFACE SOIL SAMPLE LOCATION
- ●MM-3 GE EXISTING SOIL BORING LOCATION
- ●BH000467 EPA SOIL BORING LOCATION
- FW-16 EXISTING MONITORING WELL LOCATION
- ○OT000014 EPA SOIL PILE SAMPLE
- ■F-23 EXISTING SOIL SAMPLE LOCATION USED TO SATISFY ADDITIONAL ARSENIC ANALYSIS
- (BH000321) EPA SPLIT SAMPLE IDENTIFICATION
- ✕IA-9 ABANDONED MONITORING WELL LOCATION
- (3-6) SUPPLEMENTAL SOIL SAMPLING LOCATION (DEPTH INCREMENT IN PARENTHESES)
- ALL PCB DATA LOCATED WITHIN THIS 50-FOOT WIDE STRIP WILL BE UTILIZED IN UTILITY CORRIDOR EVALUATIONS.

NOTES:

1. ACCESS/CLEARANCE LIMITATIONS MAY PREVENT THE USE OF A DRILL RIG TO COLLECT THE SUBSURFACE SAMPLES AT LOCATIONS H-6, F-18B AND H-18B. IF DRILL RIG ACCESS IS NOT POSSIBLE, GE WILL EITHER ATTEMPT TO MANUALLY COLLECT THESE SAMPLES OR WILL ATTEMPT TO COLLECT THE REQUIRED SOIL SAMPLES AT A SOIL BORING LOCATION IMMEDIATELY OUTSIDE THE BUILDING IN CLOSE PROXIMITY TO THE PROPOSED BORING LOCATION.
2. BASE MAP MODIFIED FROM SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS, DATED 8/15/01.
3. UTILITIES ARE SHOWN IN AN APPROXIMATED WAY ONLY AND ALL UTILITIES MAY NOT BE SHOWN. PRIOR TO ANY CONSTRUCTION, THE CONTRACTOR SHALL CONTRACT "DIG-SAFE" AND HAVE ALL UNDERGROUND UTILITIES MARKED ON THE GROUND.

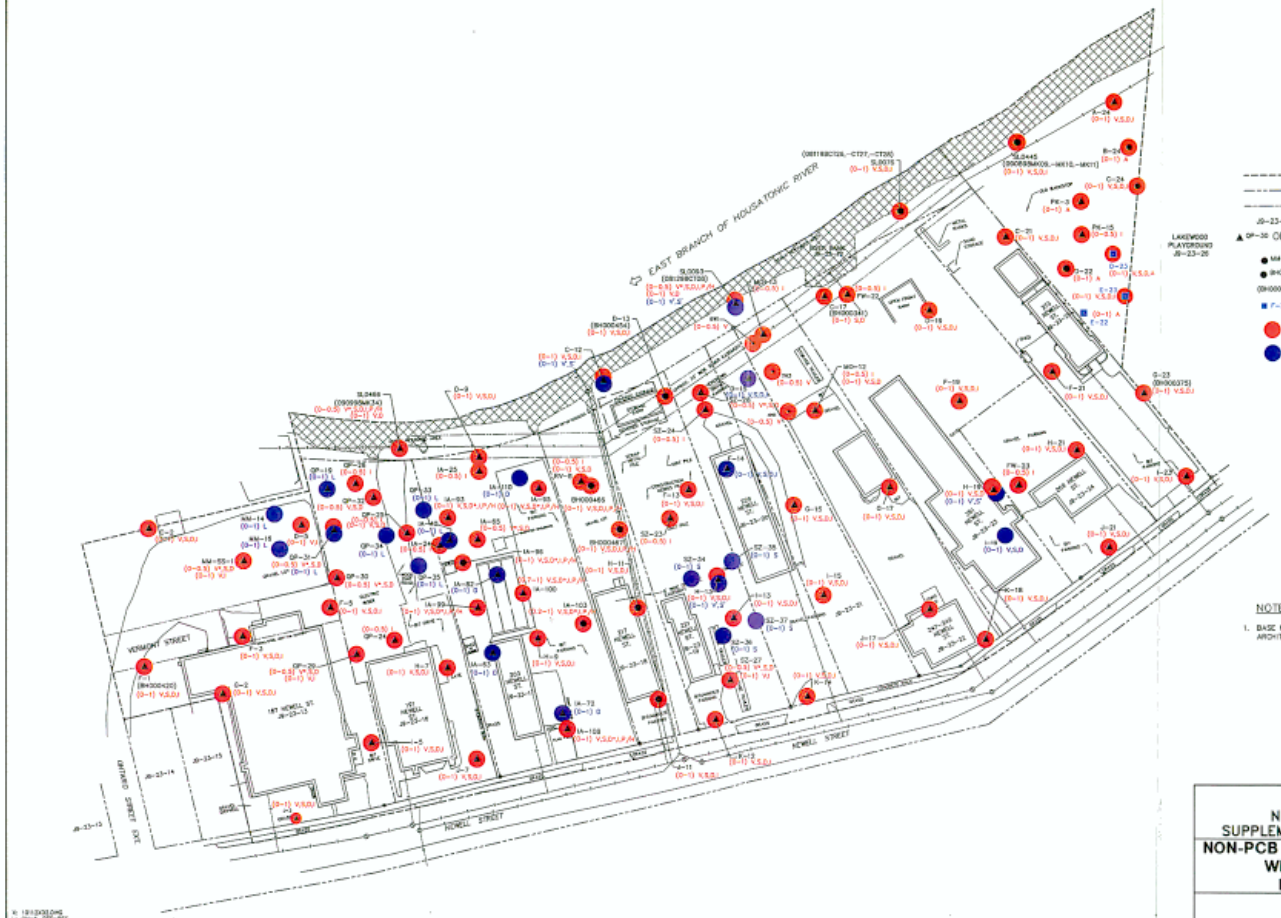
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I
REVISED SUPPLEMENTAL SAMPLING PROPOSAL

REVISED SUPPLEMENTAL PCB SOIL SAMPLE LOCATIONS

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

FIGURE 1

X: 10112X02.DWG
P: PAGESET/PLT-DL
8/19/02 SYR-54-SDL LJP NES
C/10112003/10112P07.DWG

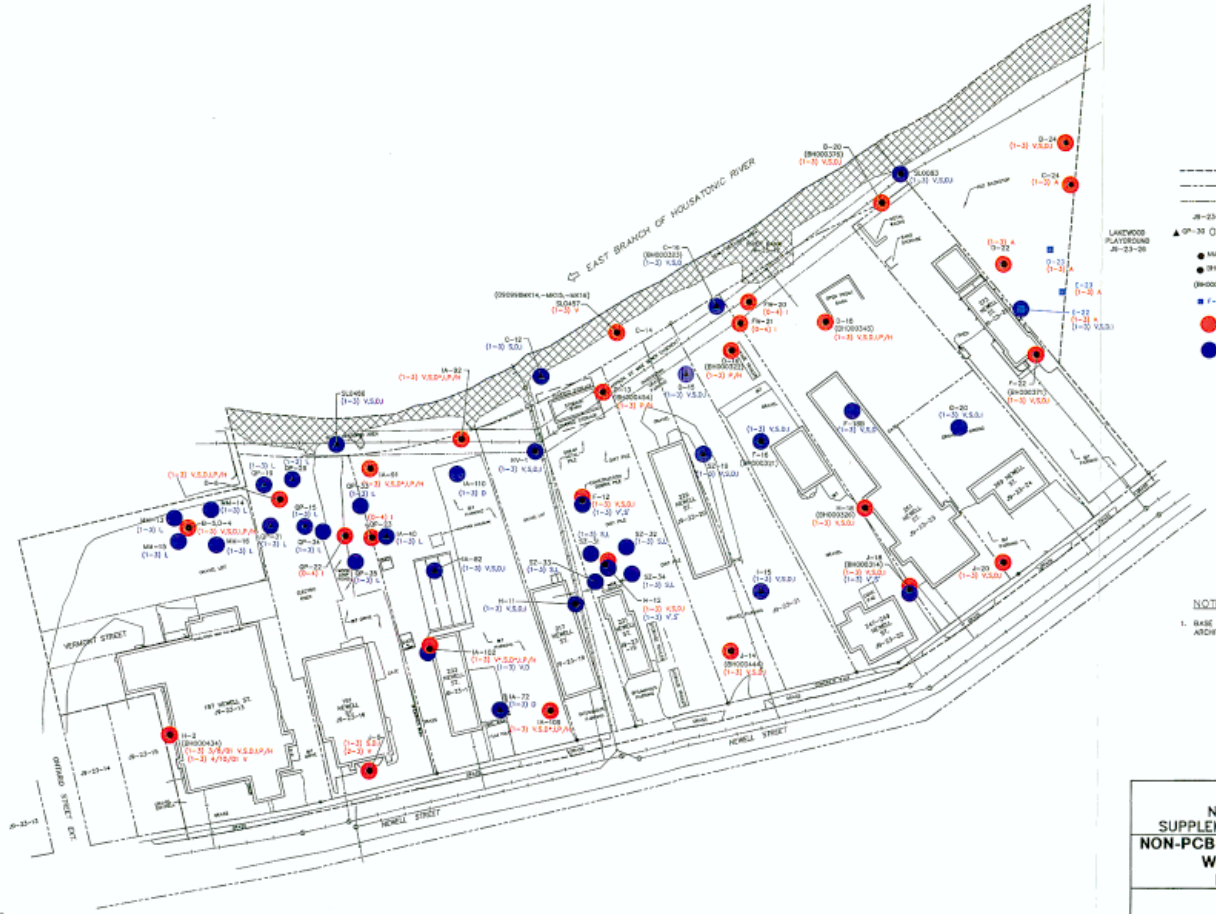


GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

NEWELL STREET AREA I
SUPPLEMENTAL SAMPLING PROPOSAL
NON-PCB SOIL SAMPLE LOCATIONS WITHIN 0- TO 1-FOOT DEPTH INCREMENT

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

FIGURE 2

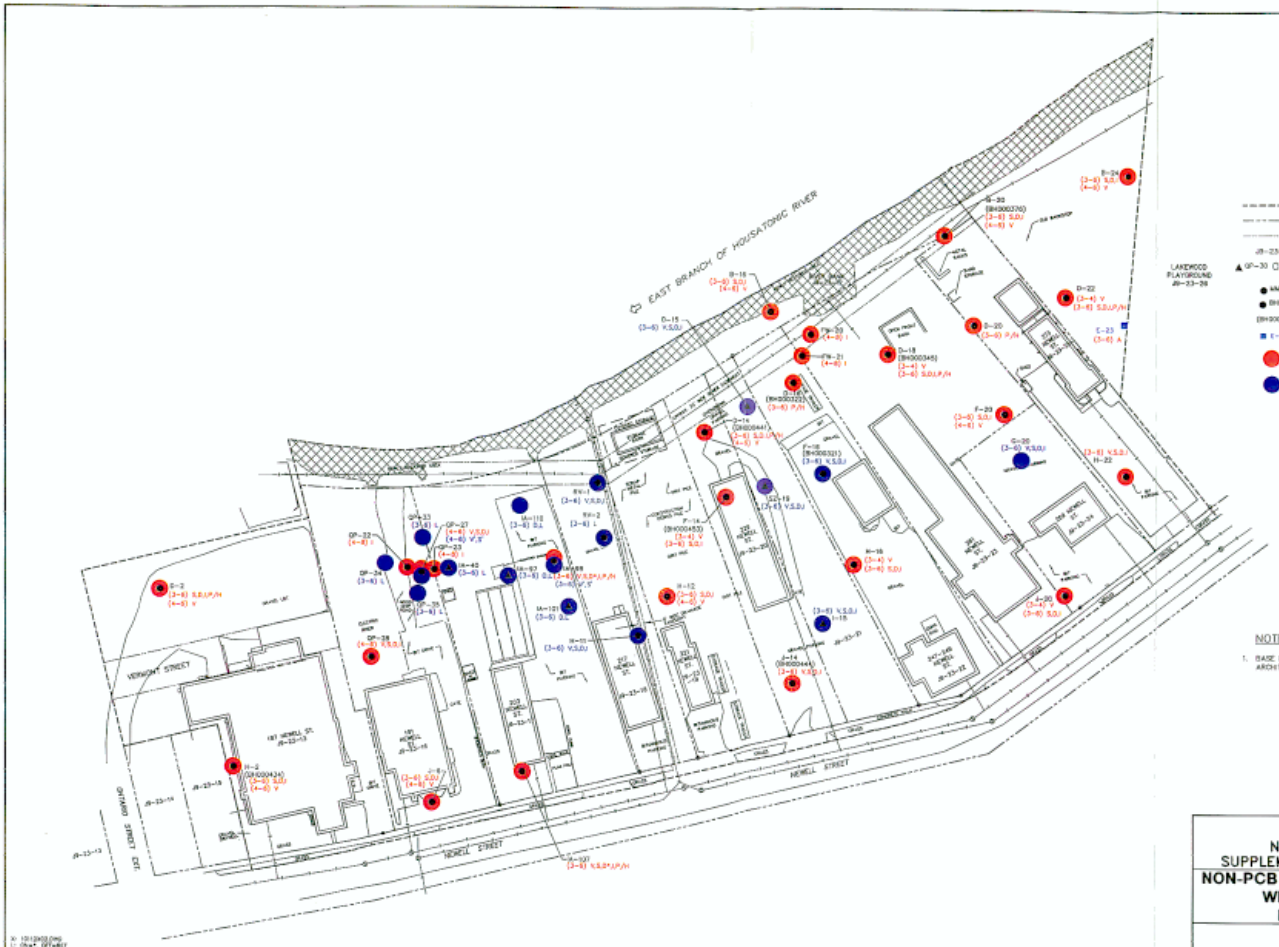


GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I
SUPPLEMENTAL SAMPLING PROPOSAL

NON-PCB SOIL SAMPLE LOCATIONS WITHIN 1- TO 3-FOOT DEPTH INCREMENT

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

FIGURE 3



GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I
SUPPLEMENTAL SAMPLING PROPOSAL

NON-PCB SOIL SAMPLE LOCATIONS WITHIN 3- TO 6-FOOT DEPTH INCREMENT

BLASLAND, BOUCK & LEE, INC.
engineers & scientists

FIGURE 4

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I
SUPPLEMENTAL SAMPLING PROPOSAL

NON-PCB SOIL SAMPLE LOCATIONS WITHIN 6- TO 15-FOOT DEPTH INCREMENT

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

FIGURE 5