



05-0102

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

August 5, 2002

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

Re: Conditional Approval of General Electric Company's (GE) July 2002 *Newell Street Area I Proposal for Supplemental Pre-Design Soil Investigations*, GE Housatonic River Project Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

In December 2001, GE submitted a document entitled *Conceptual Removal Design/Removal Action Work Plan for Newell Street Area I* (Conceptual RD/RA Work Plan), in accordance with the requirements of the Consent Decree (CD) entered on October 27, 2000 by the United States District Court for the District of Massachusetts, and between GE, the U.S. Environmental Protection Agency (EPA), the Massachusetts Department of Environmental Protection (MDEP), and other agencies. EPA provided comment on the Conceptual RD/RA Work Plan in the May 24, 2002 letter: *Comments on General Electric Company's (GE) December 2001 Conceptual Removal Design/Removal Action Work Plan for Newell Street Area I*. GE prepared the *Newell Street Area I Proposal for Supplemental Pre-Design Soil Investigations* document in response to EPA's May 24, 2002 comments and conversations between GE, EPA and the MDEP.

This *Newell Street Area I Proposal for Supplemental Pre-Design Soil Investigations* (Proposal) is subject to the terms and conditions specified in the Consent Decree (CD). 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 proposes supplemental Appendix IX+3 soil sampling to delineate the extent of elevated semi-volatile organic compound (SVOC) concentrations detected at locations J9-23-19-H13, and -I13 (0- to 1-foot depth increment) and elevated SVOC and lead concentrations at location J9-23-19-H12 (1- to 3- foot depth increment). GE shall revise the proposed delineation sampling plan as follows:
 - SZ-36 Move 0- to 1-ft sample west to the other side of the trailer near the building along the "I" grid line.
 - SZ-32 Add a new 0- to 1-ft sample for SVOCs.
 - SZ-31 Move 1- to 3-ft sample to property boundary along "G" grid line.
 - I-13 Add a new 1- to 3-ft sample for SVOCs to delineate the vertical extent of elevated SVOC concentrations at that location.
2. GE has proposed additional sampling to delineate the extent of elevated lead at selected sample locations and properties. EPA has the following comments on GE's proposed approach:

- a. While the proposed delineation samples address the locations identified in EPA's May 24, 2002 letter, the proposed sample locations are not located beyond the extent of elevated lead results. Three additional locations with elevated lead concentrations need to be addressed: in the 0- to 1-foot depth interval, on Parcel J9-23-16, sample location QP-25 had a reported lead result of 8,150 ppm, sample location QP-26 had a reported lead result of 1,830 ppm and at Parcel J9-23-17, sample IA-93 has a lead concentration of 9,000 ppm.
- b. GE has not proposed to conduct sampling at the next deeper interval below the locations with elevated lead results to vertically define the extent of lead concentrations. GE shall delineate the vertical extent of lead concentrations by sampling at locations D-4 (3- to 6-foot depth interval), D-5 (1- to 3- foot depth interval), and D-6 (3- to 6- foot depth interval).
- c. GE has not proposed to collect samples from the maximum sampling depth interval associated with samples exhibiting elevated lead concentrations. To address elevated lead in the 8- to 12-foot depth interval of samples QP-22 and QP-23, GE shall collect lead delineation samples from the 6- to 10-foot sample depth intervals at locations QP-33, -34, -35 and IA-40.

GE shall revise its approach for delineating areas having elevated lead concentrations taking into account the foregoing comments.

3. At Parcel J9-23-21, GE shall collect an Appendix IX+3 sample at D-15 (6- to 15-foot depth interval) and analyze for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and inorganic constituents.
4. GE has proposed to advance soil borings and collect samples in existing buildings at Parcel J9-23-16, location H-6; and Parcel J9-23-23, locations F-18B and H-18B. If it is not feasible to advance these borings inside the buildings, GE has proposed to select replacement-boring locations outside of the building, as close as practicable to the proposed location. EPA recommends that should the H-6 boring location need to be relocated to outside the building, that it be relocated to the north side of the building. Similarly, boring F-18B should be relocated to the west of the building since boring F-18 already exists to the east of the building.
5. Based on the results of previous discussions between GE and EPA, GE shall advance the following borings beyond the depth interval where GE has proposed to collect samples, so that EPA can collect the following soil samples: C-8 (3- to 6-ft, and 6- to 15-ft), C-14 (3- to 6-ft, and 6- to 15-ft), C-16 (3- to 6-ft), F-14 (1- to 3-ft), QP-33 (10- to 15-ft), QP-34 (10- to 15-ft), QP-35 (10- to 15-ft), and IA-40 (10- to 15-ft).
6. GE has proposed to submit an addendum to the Conceptual RD/RA Work Plan within 5 months of EPA's approval of the supplemental soil investigations. EPA wants to ensure that removal actions at Newell Street Area I begin as soon as possible. Therefore, GE shall submit an addendum within 4 months of the date of GE's receipt of EPA's approval of the Revised Proposal for Supplemental Pre-Design Soil Investigations (discussed below).
7. GE shall submit a Revised Proposal for Supplemental Pre-Design Soil Investigations that takes into account the above conditions within 14 days from GE's receipt of this conditional approval letter.

EPA reserves its right to perform additional sampling in Newell Street Area I 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) 918-1365.

Sincerely,



Bryan Olson

GE/Housatonic Team Leader

cc: Dick Gates, GE
Sue Steenstrup, MDEP
Sue Keydel, MDEP
Mike Nalipinski, US EPA
Holly Inglis, US EPA
John Kilborn, US EPA
K.C. Mitkevicius, USACE
James Bieke, Shea & Gardner
James Nuss, BBL
✓ Dawn Jamros, Roy F. Weston
Pittsfield MA Office, US EPA
Mayor Sara Hathaway, City of Pittsfield
Tom Hickey, PEDDA
Property Owners
Teresa Bowers, Gradient
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