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*Addendum to Pre-Design  
Investigation Work Plan  
for the  
Newell Street Area I  
Removal Action*

General Electric Company  
Pittsfield, Massachusetts

December 2000



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**ADDENDUM TO  
PRE-DESIGN INVESTIGATION WORK PLAN  
FOR THE NEWELL STREET AREA I REMOVAL ACTION**

**General Electric Company  
Pittsfield, Massachusetts**

**December 1, 2000**

On March 6, 2000, the General Electric Company (GE) submitted a *Pre-Design Investigation Work Plan for the Newell Street Area I Removal Action* (Work Plan). That document described the pre-design soil investigations proposed by GE to support the design of the soil-related Removal Action to be conducted for Newell Street Area I under the terms of the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site. On November 16, 2000, following entry of the CD by the U.S. District Court on October 27, 2000, the U.S. Environmental Protection Agency (EPA) issued a letter providing conditional approval of that Work Plan. A copy of that letter is included as Attachment A hereto. EPA's conditional approval letter required GE to submit an Addendum to the Work Plan to address the EPA comments set forth in its letter. This document constitutes that Addendum.

In response to EPA's comments 1 through 6 (see Attachment A), GE has revised the scope of its proposed pre-design soil investigations. These modifications are described herein and presented in several attachments to this Addendum. First, Attachment B includes two figures that were previously included in the March 2000 Work Plan and have since been revised in light of EPA comments. The first (revised Figure 2) identifies the prior soil sampling locations within Newell Street Area I. This figure supersedes Figure 2 of the March 2000 Work Plan and includes additional sampling locations related to the Upper ½ Mile Reach Removal Action. The second figure in this attachment (revised Figure 3) identifies the proposed surface and subsurface soil sampling locations, as well as those existing soil sampling locations that are being used to satisfy certain of the pre-design sampling location/depth requirements. This figure supersedes Figure 3 of the March 2000 Work Plan. In response to EPA comment 1, this figure incorporates a re-alignment of the subsurface soil sampling grid (to be consistent with the grid previously established for Parcel J9-23-17) and includes a grid coordinate labeling system.

Based on the modifications described above, and considering the existing soil data, GE has revised its proposed pre-design soil investigation program. Attachment C presents an overall summary of that proposed program. That attachment summarizes, on a sample-by-sample basis, the proposed sampling locations, depths, and analytical parameters. A total of 124 locations will be sampled, at which 225 soil

samples will be collected for PCB analysis and approximately 85 soil samples will be analyzed for one or more groups of the Appendix IX+3 constituents.

Attachment D summarizes the existing and proposed soil sampling locations and depths that collectively satisfy the grid-based sampling requirements. In response to EPA comment 3, GE now proposes to use existing data from the 0- to 6-inch depth increment to satisfy the soil sampling requirement for the 0- to 1-foot depth increment. Attachment E summarizes the available soil data for Newell Street Area I and categorizes these data based on their potential use related to future Remedial Design/Remedial Action (RD/RA) activities. Specifically, that attachment categorizes the existing data into one of the following three categories:

- Data that have been used to satisfy grid-based pre-design soil sampling requirements and will be incorporated into future RD/RA activities (designated “Grid Characterization”);
- Data that have not been incorporated into the proposed grid-based pre-design investigations but will be considered in future RD/RA activities (designated “Supplemental”); or
- Data that have not been incorporated into the proposed pre-design investigations and will not be used in any future RD/RA activities (designated “Rejected”). In general, these excluded data correspond to data collected over large depth intervals (e.g., 0 to 10 feet).

The proposed soil investigation program addresses EPA’s comments on the scope of that program and will continue to meet the soil sampling requirements summarized in Section 3.3 of the Work Plan. EPA comments 1 and 3 were discussed above. In response to EPA comment 2, GE is proposing to include volatile organic compounds (VOCs) in the analyses for all Appendix IX+3 samples, except for locations where usable VOC data already exist; and it is also proposing to analyze 15 subsurface samples located along grid line D (as shown on the revised Figure 3) for pesticides and herbicides, as indicated in Attachment C. In response to EPA comment 4, relating to sampling inside of or adjacent to buildings, the sampling program has been expanded to incorporate the sampling identified in EPA’s comment, as shown on revised Figure 3 and in Attachment C. In response to EPA comment 5, three proposed soil borings have been added at Parcel J9-23-12 (B-16, B-18, and existing location SLO457). In response to EPA comment 6, the specific sampling locations specified by EPA have been added to the program, as shown on revised Figure 3.

The following table summarizes the numbers of PCB and Appendix IX+3 soil analyses that will be available to satisfy the grid-based soil sampling requirements at Newell Street Area I after completion of the proposed soil sampling and analysis program, taking into account the existing data that will be used to satisfy such requirements:

PCB Analyses by Depth Increment						Appendix IX+3 Analyses by Depth Increment*				
0-1 ft	1-3 ft	3-6 ft	6-10 ft	10-15 ft	Total	0-1 ft	1-3 ft	3-6 ft	6-15 ft	Total
183	46	46	46	46	367	55	19	18	18	110

\* Excluding pesticides and herbicides, which will be analyzed for at 15 subsurface locations along grid line D as specified in Attachment C.

Thus, following the proposed sample collection and analysis effort and taking into account the existing usable data, a total of 367 PCB sample results will be available to satisfy the applicable grid node and depth increment requirements described in Section 3.3 of the Work Plan. In addition, 110 sets of analyses will be available for Appendix IX+3 constituents (excluding pesticides and herbicides, except as discussed above), with these analyses approximately evenly divided between the top foot of soil and deeper depth increments. Although this total number is slightly less than one-third of the total number of PCB results, that can be explained by the fact that the PCB samples from depths greater than 6 feet will be analyzed in two depth increments (6 to 10 feet and 10 to 15 feet), whereas Appendix IX+3 samples from such depths will be analyzed, in accordance with prior EPA concurrence, as single composite samples of the 6- to 15-foot depth.

In addition, in response to EPA comment 7, all readily available information concerning utility corridors at Newell Street Area I is included in Attachment F. GE will attempt to obtain additional information on other utilities and provide such additional information (if found) in the Pre-Design Investigation Report. Also, GE is aware of four underground storage tanks which are, or were, located on properties at Newell Street Area I. GE will, to the extent possible, identify the status and locations of these tanks and present that information in the Pre-Design Investigation Report.

Finally, in response to EPA comment 8, GE notes that no natural resource restoration/enhancement activities are required at Newell Street Area I under the CD; hence, no investigations relating to such activities are necessary.

With respect to the schedule, GE proposes to initiate the field sampling activities described above following EPA approval of this Addendum and subject to obtaining the necessary access permission from the property owners. GE has already begun the process of requesting such access. Assuming that (1) EPA provides prompt approval of this Addendum and does not require significant changes in the scope of the proposed investigation, (2) access permission for sampling can be obtained in a timely manner, and (3) the sampling activities are not significantly hindered by winter weather conditions, GE will complete the investigations and submit a Pre-Design Investigation Report within 180 days from entry of the CD -- i.e., by April 25, 2001. However, if significant delays occur in any of these steps, GE may not be able to meet the proposed schedule. If it cannot do so, GE will notify EPA and propose a revised schedule for completing the investigations and submitting the Pre-Design Investigation Report.

# ***Attachment A***

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

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***EPA Conditional Approval Letter  
dated November 16, 2000***



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100  
BOSTON, MASSACHUSETTS 02114-2023

November 16, 2000

NOV 17 2000

GE CORPORATE  
ENVIRONMENTAL PROGRAM

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

Via Facsimile and U.S. Mail

RE: Conditional Approval of General Electric's March 6, 2000 submittal entitled "Pre-Design Investigation Work Plan for the Newell Street Area I Removal Action

Dear Mr. Silfer:

On March 6, 2000, the General Electric Company (GE) submitted the above-referenced document (the "Work Plan") to the Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (DEP). This Work Plan is subject to the terms and conditions specified in the Consent Decree that was entered in U.S. District Court on October 27, 2000 (the "Consent Decree").

Pursuant to Paragraph 73(b) of the Consent Decree, the EPA, after consultation with the DEP, approves the above-referenced submittal subject to the following conditions:

1. GE shall shift the 100 foot sampling grid to match the existing grid for property number J9-23-17. EPA also recommends that GE label the grid using the numbering and lettering system which had been previously discussed and agreed upon (i.e., the vertical grid should start with the number 1 on the western edge of the site and the horizontal grid should start with the letter A on the northern edge of the site).
2. GE shall sample and analyze for all Appendix IX constituents, including VOCs, pesticides and herbicides. For pesticides and herbicides, the sampling and analyses may be limited, in the first instance, to subsurface samples along grid line D. If this sampling indicates that the presence of these Appendix IX constituents (pesticides and herbicides) may have an impact on the extent of the ultimate response action, GE will be required to conduct additional sampling and analyses.
3. GE shall provide a table showing the results of the historic data evaluation that was conducted, including an explanation of why any samples have been rejected for use. Samples in the 0-6 inch interval, which would otherwise be considered to be valid data, should be incorporated into the data set as a 0-1 foot sample.
4. GE shall sample nodes that fall within buildings with dirt floors. For the building that encompasses Node D12, GE can conduct surficial sampling at Node D12 in the building and the subsurface sampling at Node D13, which is immediately outside of the building. For the building which encompasses Node F14, GE shall conduct both surface and subsurface sampling within the building unless the appropriate subsurface sampling equipment will not fit into the building. If this occurs, the subsurface sampling may be conducted just outside the northern edge of the building.

For nodes which fall within buildings (15 feet or less from the edge of the building) that do not have dirt floors, GE shall sample adjacent to those nodes outside the building footprint.

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5. GE shall propose a minimum of 3 additional soil borings for property number J9-23-12. The locations and extent of these borings should be selected considering existing available data and in a manner consistent with the grid sampling approach for recreational properties outlined in Appendix E to the Consent Decree.

6. GE shall sample the following grid nodes that were not originally proposed: C2, C3, C12, C17, C24, D1, D13, F4, F18, G0, H2, H18, and J2. Such soil sampling shall consist of either surface soil sampling or installation of soil borings depending on whether the grid node falls on the 50-foot or 100-foot grid.

7. We note that several underground tanks and utility lines may be present on the properties subject to this report. GE shall submit, in the addendum to the Work Plan discussed below, all readily available information which delineates the utility corridors. GE should also begin to gather additional information, which may not be readily available, on other utility corridors and submit that information in the Pre-Design Investigation Report.

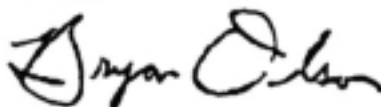
8. The Work Plan addendum shall discuss, and propose if appropriate, sampling locations necessary to evaluate the Performance Standards for any natural resource restoration/enhancement activities (See Appendix E to the Consent Decree, (page 87 of 92)) If no natural resource sampling is required, the addendum to the Work Plan should state that no such sampling is required.

EPA reserves its right to perform additional sampling in the area subject to this Work Plan. EPA also reserves the right to require modifications to the Work Plan and/or require additional sampling or response actions, if necessary, to meet the requirements of the Consent Decree.

Within 15 days of the receipt of this letter, GE shall submit an addendum to the Work Plan which incorporates the above comments. In addition, GE shall complete the investigation work and submit a Pre-Design Investigation Report within 180 days of the entry of the Consent Decree, as proposed in Section 5 of the Work Plan.

If you have any questions, please call me at (617) 918-1365.

Sincerely,



Bryan Olson  
GE/Housatonic Team Leader

Attachment

cc: Property Owners  
Michael Nalipinski, US EPA  
Tim Conway, US EPA  
John Kilborn, US EPA  
Alan Weinberg, MA DEP  
Robert Bell, MA DEP  
J. Lyn Cutler, MA DEP  
Ken Finkelstein, NOAA  
Dick Gates, GE  
Andrew Thomas, GE  
Dawn Veilleux, WESTON  
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