



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

01-0034

September 15, 2003

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

Re: Conditional Approval of General Electric Company's (GE) August 4, 2003 Removal Design/Removal Action Work Plan for Newell Street I

Dear Mr. Silfer:

I have received your letter, dated August 4, 2003, which transmits the Final Removal Design/Removal Action Work Plan for Newell Street I. Subject to the conditions outlined below, EPA approves the aforementioned document.

Conditions

1. During the cleanup activities described in the plan, GE shall closely coordinate with EPA and Weston Solutions, Inc. (Weston) to ensure that the appropriate level of oversight is achieved. For example, at the regularly scheduled Monday morning progress meetings, GE shall update EPA and/or Weston on work that was accomplished during the previous week and future work that is expected to take place during the week of the progress meetings. This coordination is particularly important during excavation and cap placement activities.
2. GE shall ensure that the proposed Newell Street I drainage outlets are constructed to prevent erosion of the restored ½ Mile Reach river banks.
3. GE proposes to potentially utilize on-site stockpiled soils as backfill material. GE shall review available soil pile data and conduct any additional sampling that is necessary to meet the requirements of the Soil Cover/Backfill Characterization Plan.
4. GE proposes to use soil with a maximum particle size of 3 inches as backfill material. For the top six inches of backfill in areas above which an engineered barrier will be placed, GE shall ensure that soil with a maximum particle size of 1 inch is utilized. Alternatively, GE can add a non-woven cushion geotextile instead of using the soil with a smaller maximum particle size.
5. GE has proposed to abandon several wells to help to facilitate the cleanup work. GE shall not abandon Well SZ-3R as it may be useful for future groundwater investigations.
6. As part of the restoration plan for these properties, GE proposes to reconstruct items to "similar dimensions and appearance." It is our understanding that GE intends to submit to the property owners a "restoration agreement" as part of the access agreement process. This restoration agreement will identify all items at a property affected by the remediation activities and will provide a detailed description of how each item will be restored. The property owner and GE will both sign off on the agreement to ensure that agreement has

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

been reached. Although not in the work plan, EPA endorses this method of ensuring a mutual understanding between GE and the property owners with regard to this critical aspect of the cleanup.

7. EPA is concerned with the potential for water buildup in the anchor trenches. GE shall place lower permeability soil in all anchor trenches and/or place a flap of geomembrane over those anchor trenches which have a geocomposite drainage net over the top of the trench.
8. GE shall ensure that, where utilized instead of seed, sod shall account for the final two inches of restoration.

GE shall submit the supplemental information package described in Section 9 of the work plan on or before September 29, 2003. EPA expects building demolition activities to begin immediately and remediation activities to commence within the next month.

Sincerely,



Bryan Olson
GE/Housatonic Team Leader

cc: Sue Steenstrup, MDEP
Holly Inglis, US EPA
Tim Conway, 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
Newell I Property Owners
Public Information Repositories (4)