



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

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November 16, 2000

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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