



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
ONE CONGRESS STREET, SUITE 1100  
BOSTON, MA 02114-2023

November 4, 2004

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

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's submittal titled "*Conceptual Removal Design/ Removal Action Work Plan for Newell Street IP*", GE - Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter provides the Environmental Protection Agency's (EPA's) conditional approval of the above referenced "*Conceptual Removal Design/ Removal Action Work Plan for Newell Street IP*" (Work Plan) dated July 2004. The Work Plan is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2000.

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 which are presented below.

1. The Workplan states that during final design, the final soil removal limits and depths of excavation may be adjusted. Consequently, GE shall consider the following modifications to the proposed remediation:
  - a. Section 4.2, Evaluations for Parcel I9-7-1. GE shall consider extending the soil removal on this parcel to include the top foot of soil bounded between the pink polygon shown in Figure 4-1 and the riverbank soil along the East Branch of the Housatonic River.
  - b. Section 4.3 Evaluation for Parcel J9-23-1. GE shall consider extending the soil removal on this parcel to include the top foot of soil bounded between the pink polygon shown in Figure 4-1 and the riverbank soil along the East Branch of the Housatonic River.
  - c. Sections 4.6 and 4.7, Evaluations for Parcels J9-23-4 and J-9-23-5. GE shall consider expanding the excavation to include removal of soil within polygons

associated with RAA13-B87 at the 3- to 6- ft depth interval for each of these parcels.

- d. Section 4.8, Evaluation for Parcel J-9-23-6. GE shall consider expanding the excavation to include removal of soil within polygons associated with RAA13-F91 at the 3- to 6- ft depth interval.
  - e. Section 4.9, Evaluations for Parcel J-9-23-8. GE shall consider modifying the proposed limits of the Engineered Barrier to include: (1) placement of the barrier over soil in the vicinity of N2SC-08 which is bounded by polygon 399 at the 3 to 4- ft depth interval; and (2) expansion of the barrier over soil in the vicinity of sample locations RAA13F-94 and NS-21 and bounded by the northwest corner of Parcel J9-23-9.
  - f. Section 4.11 City of Pittsfield Property. GE shall consider extending the soil removal on this parcel to include the top foot of soil bounded between the pink polygon in the vicinity of RAA13-Z85 as shown in Figure 4-1 and the riverbank soil along the East Branch of the Housatonic River.
2. Section 4.12, Utility Corridor Evaluations. EPA has reviewed the discussions presented in the Conceptual Removal Design/ Removal Action (RD/RA) Work Plan concerning the need for additional soil removal to address utilities potentially subject to emergency repair. EPA does not concur with GE's evaluations concerning soils within Utility Area 2 (i.e., stormwater piping within the City of Pittsfield property) and Utility Area 4 (i.e., eastern portion of 48-inch sanitary sewer line). EPA has determined that additional soil removal is warranted to address soils within certain portions of each of these utility corridors. Specifically, in the Final RD/RA Work Plan, GE shall include the following soil removals to address these two utility corridors:
- a. Within the corridor associated with Utility Area 2 (City of Pittsfield property), GE shall remove soils from the PCB polygons associated with sample RAA13-F91 to a depth of 5 feet. Previous soil removal activities proposed in the Conceptual RD/RA Work Plan indicate that soils associated with this sample would be removed to a depth of 3 feet.
  - b. Within the corridor associated with Utility Area 4 (eastern portion of 48-inch sanitary sewer line), GE shall remove soils from the PCB polygons associated with samples NS-1 and NS-1A to a depth of 8 feet.
3. Section 5, Preliminary Design Information and Future Design Related Activities. GE shall consider including in the Final RD/RA Work Plan a discussion of: (1) how the proposed remedial actions will also serve to ameliorate groundwater beneath the Newell Street II area; and (2) how the NAPL recovery program will be coordinated with the proposed removal actions described in this Work Plan.

GE shall submit a Final RD/RA Work Plan for Newell Street II within four months of the date of this letter. This Final RD/RA Work Plan shall address the comments provided above and shall

include a schedule for implementing the proposed removal actions.

EPA reserves its right to perform additional sampling and/or require additional Response Actions, if necessary, to meet the requirements of the Consent Decree.

Please contact me at (617) 918-1240 if you have any questions regarding this approval.

Sincerely,

  
William Lovely  
GE Facility Project Manager

cc:     Tim Conway, EPA  
          John Kilborn, EPA  
          Rose Howell, EPA  
          Dean Tagliaferro, EPA  
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          Charles Nicol, Northeast Utilities Service Co.  
          Charles J. Dooley, Western Mass. Electric Co.