05-0095

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

SDMS 268554

April 18, 2002

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

Re: Comments on General Electric Company's (GE) October 2001 *Pre-Design Investigation Work Plan for the Newell Street Area II Removal Action,* GE Housatonic River Project Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA's) conditional approval of the above-referenced *Pre-Design Investigation Work Plan for the Newell Street Area II Removal Action*. The Newell Street Area II Removal Action Area (RAA) is also referred to as RAA 13 in project documents.

This *Pre-Design Investigation Work Plan for the Newell Street Area II Removal Action* (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:

Conditions

Within 30 days of the receipt of this letter, GE shall submit an addendum to the Work Plan which addresses the following comments:

General Comments

1. Consistent with other pre-design investigations conducted pursuant to the CD and the SOW, grid nodes located within 15 feet (ft) of the boundary of the RAA shall be included in the investigation of RAA 13. Specifically, grid nodes Y87, Y88, Y89, Y90, Y91, B79, F97, F98, F99, I95, and Z99 are located within 15 feet of the boundary of the RAA; therefore, GE shall propose to collect additional samples or use existing analytical results to characterize these grid nodes.

2. The boundary of the RAA, as depicted in Figure 2 of the Work Plan, does not follow the property boundary between parcels J9-23-8 and J9-23-9. GE shall correct Figure 2, and include available and valid data from this area for grid characterization or supplemental use.

3. The boundary of the RAA, as depicted in Figure 2 of the Work Plan, follows the property boundary along the western edge of the RAA. GE shall extend the RAA to the western fence line. Extending the boundary would result in the addition of six grid nodes (within, or within 15 feet of, the new boundary) to the Work Plan: B83, C84, D85, E86, H88, and I89. EPA reserves the right to extend the boundary of the RAA based on the analytical results.

4. The majority of residential parcels and right-of-ways adjacent to RAA 13 have been sampled, and portions of several parcels (J9-23-6, J9-23-7, J9-23-9, J9-23-10 and J9-23-11) have been remediated. Several RAA-13 grid nodes are within or adjacent to areas of previous remediation. In areas where remedial activities have occurred (and adjacent to such areas), data collected prior to remedial activities should be used to characterize soil concentrations within RAA 13 for the soil that remains. For example, at grid node E-96, the 0 to 1-foot depth interval will be characterized using sample 161-C3 (the soil in this area was removed during remediation efforts in 1999). At the same location, in boring J9-23-12-SB-2, PCBs were found at 350 ppm in the 6- to 8-foot depth interval; the samples from this boring are not proposed for use in Table 1 of the Work Plan. GE shall add J9-23-12-SB-2 to Figure 2 and Table 1, and use all available, valid data (both within RAA 13 and within approximately 15 feet of the RAA boundary), for either grid characterization or supplemental use.

5. GE's Appendix IX+3 sampling strategy to meet vertical and horizontal spatial distribution requirements is unclear as presented in Tables 2 and 4 and Figure 2 of the Work Plan. For example, it appears that existing subsurface Appendix IX+3 samples from five locations (NS-10, NS-11, NS-12, NS-13, and NS-14) are proposed for characterization of the 10-15-ft sample depth interval, yet all five locations are within 100 ft of each other. Further, based on the information provided in Tables 2 and 4 of the Work Plan, the sample depth intervals called for in the SOW do not appear to be evenly-represented by Appendix IX+3 samples. The number of subsurface Appendix IX+3 samples proposed for characterization from each sample depth interval are not evenly distributed between the four intervals, with the 10- to 15-ft sample depth interval over-represented. In addition, the Appendix IX+3 analyte groups are not evenly represented, with samples analyzed for dioxins/furans over-represented.GE shall develop a separate figure for Appendix IX+3 sampling (existing and proposed), and a table showing Appendix IX+3 sample distribution, to be included in the Addendum to the Work Plan. Additional samples required to meet the distribution requirements specified in the SOW, and those required per General Comments 1 and 3, shall be presented in the Addendum to the Work Plan.

6. Section 2.3.2 of the SOW indicates that GE must demonstrate that soil in subsurface utility corridors potentially subject to emergency repair requirements does not exceed a 200 ppm spatial average. GE shall identify the location and depth of all subsurface utilities on a figure in the addendum Work Plan, and propose a sampling strategy that will meet the Performance Standard for soil in subsurface utility corridors. The sampling strategy will include soil samples located no more than 25 ft from the utility and spaced at a linear interval of approximately 100 ft for the subsurface samples along each utility corridor.

Specific Comments

1. **Table 1.** The analytical results for sample BE-0041, depicted on Figure 2, are not included in the table.

2. **Table 2.** GE shall correct the Sample ID for the VOC sample collected from boring N2SC-09. Sample ID SS09 should apply to a sample collected from 14 to 15 ft bgs, not 8 to 10 ft bgs, as indicated (Source Control sampling protocol).

3. **Table 3.** For grid node H91, GE indicates that the 1-3 ft sample depth interval will be characterized using data from the 1-2 ft sample from location J9-23-7-3. However, Table 1 indicates that data from the 2-4 ft bgs interval of location J9-23-7-3 is to be used for supplemental purposes. GE shall use the data from both the1-3 and 2-4 ft bgs depths of location J9-23-7-3 to characterize the entire 1-3 ft depth interval of grid node H91.

4. **Figure 2.** Two minors error were noted in Figure 2.

- Two locations designated NS-24 are depicted on Figure 2; one is near grid node B4 and the second is near grid node F95.
- In the table entitled "Summary of Soil Boring PCB Sample Results", the value for NS-7, 4-6 ft bgs, should be "- -" (no sample collected) instead of 130 ppm.

EPA reserves its right to perform additional sampling in RAA 13 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 River Team Leader

cc: Mike Carroll, GE
Dick Gates, GE
J. Lyn Cutler, MA DEP
Sue Keydel, MA DEP
Bryan Olson, US EPA
Holly Inglis, US EPA
Tim Conway, US EPA
K.C. Mitkevicius, USACE
Dawn Jamros, Roy F. Weston
Pittsfield MA Office, US EPA
Mayor Sara Hathaway, City of Pittsfield
Tom Hickey, PEDA
Teresa Bowers, Gradient
Public Information Repositories (2)
Site File