



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

05-0104
SDMS 268555

August 21, 2002

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

Re: Conditional Approval of General Electric Company's (GE) May 2002 *Newell Street Area II Pre-Design Investigation Work Plan Addendum*, GE Housatonic River Project Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

In October 2001, GE submitted a document entitled *Pre-Design Investigation Work Plan for Newell Street Area II* (PDI Work Plan), in accordance with the requirements of the Consent Decree (CD) entered on October 27, 2000 by the United States District Court for the District of Massachusetts, and between GE, the U.S. Environmental Protection Agency (EPA), the Massachusetts Department of Environmental Protection (MDEP), and other agencies. EPA provided comments on the PDI Work Plan in the April 18, 2002 letter: *Comments on General Electric Company's (GE) October 2001 Pre-Design Investigation Work Plan for Newell Street Area II*. GE prepared the *Newell Street Area II Pre-Design Investigation Work Plan Addendum* document in response to EPA's April 18, 2002 comments and conversations between GE, EPA and the MDEP.

This *Newell Street Area II Pre-Design Investigation Work Plan Addendum* (PDI Work Plan Addendum) is subject to the terms and conditions specified in the Consent Decree (CD). 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

1. In Table 1, several PCB samples (e.g., NS-24, NS-25, NS-27, NS-33, WMECO-1, WMECO-2, WMECO-3, and SS-1 through SS-42) have a proposed data use of "Rejected (Method)." It is not clear whether these refer to the samples now distinguished by a "B" (e.g., NS-24B) on Figure 3; or those sample locations without the differentiating "B". Further, several of these samples were collected on the same day as other samples which were not rejected; for example, NS-16 and NS-24 were both collected on June 13, 1995, but only the results for NS-24 were rejected. Similarly, samples from locations NS-25 and NS-26 were collected the same day but only the results for NS-25 have been rejected. Some of these rejected samples contain significantly elevated PCB concentrations. In the Pre-Design Investigation Report, GE shall clarify what samples are designated as rejected, and provide rationale for these rejections.
2. PCB data for a number of sample data points are not included in the Addendum or the October 2001 Work Plan. For example, sample locations NS-21, NS-24, NS-25, NS-27 and NS-33 as well as NS-21(B), NS-24(B), NS-25(B), NS-27(B) and NS-33(B) are presented on Figure 2, but data for only NS-21, NS-24, NS-25, NS-27 and NS-33 are included in Table 4-1 of the PDI Work Plan, Table 1

of the Addendum, and Figure 2 of the Addendum. Data for samples NS-21(B), NS-24(B), NS-25(B), NS-27(B) and NS-33(B) are not included. Further, analytical results for sample MM-4 are not included in the tables or figures of the PDI Work Plan or the Addendum. The Pre-Design Investigation Report (PDI Report) and other subsequent submittals should present data for all samples proposed for use.

3. EPA concurs with GE that a new surface soil sample is not required at grid location F97. However, GE has not included all applicable samples from remediated areas; for example, soils at sample location J9-23-10-SB-2 were reportedly remediated to a depth 3 feet, but PCB concentrations of 350 ppm in the 6- to 8-foot interval were not removed. GE shall use all pre-remediation soil concentrations that meet quality control/quality assurance criteria to represent those portions of spatial averaging polygons that fall outside of previously remediated areas.
4. Regarding characterization of the utility corridors, GE has relocated six proposed soil borings to within the 50-foot-wide utility corridor band. GE shall modify their proposed sampling locations as follows:
 - GE should move proposed soil boring location RAA13-B83 approximately 10 ft to the north, to allow samples from this boring to be used to characterize the western end of the utility corridor.
 - GE shall keep proposed sample location RAA13-F89 at grid node F89 (instead of relocating it into the utility corridor, as proposed in the Addendum), and add a boring in the utility corridor at previous boring location NS-29 (sampling only from 4 ft bgs to the depth of the utility at this location).
 - GE shall keep proposed sample location RAA13-Z85 at the grid node, to provide characterization of the northern side of the utility corridor. GE shall also relocate proposed sample location RAA13-1 slightly northward, to be within the 50-foot band, and collect PCB samples from all sampling depth intervals.
 - GE shall keep proposed sample location RAA13-B97 at grid node B-97 (instead of relocating it into the utility band as proposed), and add a boring within the utility band at existing sampling location GE-11, where GE shall collect an additional sample from the depth increment (10- to 15-ft) not previously sampled at that location.
5. Taking depth interval and averaging areas into account, GE has proposed to use a minimum of two Appendix IX+3 samples to characterize each parcel for non-PCB constituents. GE shall modify their proposed Appendix IX+3 sampling plan as follows:

0- to 1-foot depth interval

- a. Parcel J9-23-6- GE shall relocate proposed Appendix IX+3 sample RAA13-G88 to proposed location RAA13-F89.
- b. The City Way- GE shall relocate the proposed Appendix IX+3 sample location RAA13-I93 to grid location B87.

1- to 3-foot depth interval

- a. Parcel J9-23-6- An additional Appendix IX+3 sample is required at grid location H89. Also, GE shall collect proposed Appendix IX+3 sample RAA13-F89 at the grid node (not at the modified location proposed to address the utility corridor).
- b. The City Way- GE shall collect Appendix IX+3 samples at grid locations B87.
- c. J9-23-8- GE shall collect an additional Appendix IX+3 sample at grid location Z90.

3- to 6-foot, 6- to 10-foot and 10- to 15-foot sampling depth intervals

- a. Parcel J9-23-6- An additional Appendix IX+3 sample is required at sample location RAA13-F89 for the 10- to 15-foot sampling depth interval.
- b. The City Way - GE shall collect a minimum of three Appendix IX+3 samples at the 3- to 6-foot depth interval at the grid location B87.
- c. GE Wooded Lot - To characterize the northwestern portion of this area, GE shall relocate proposed Appendix IX+3 sample B99 (3- to 6-foot depth interval) to grid location B97.

6. On Figure 3, symbols for soil borings shall be added to grid locations B97 and Z85.

GE shall complete the investigations described in the PDI Work Plan Addendum (as revised by this letter) and submit a PDI Report within 6 months of the date of this letter. EPA reserves its right to perform additional sampling in Newell Street Area II 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 Team Leader

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