



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

05-0112
JDMS 268559

21 April 2003

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) February 2003 Pre-Design Investigation Report for 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) conditional approval of the pre-design investigation activities for the above-referenced *Pre-Design Investigation Report for Newell Street Area II Removal Action* (Report). The Report 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

1. GE has proposed to collect samples from two additional borings to further characterize soil in utility corridors for PCBs: RAA13-C88 (to a maximum depth of 7 feet bgs, because the 20-inch sanitary sewer is reportedly at a depth of 7 feet below ground), and RAA13-Z90 (to a maximum depth of 12 feet bgs as the 48-inch sewer line is 12 feet bgs). GE shall ensure that the samples will be collected to a depth equal to the depth of the bottom of the utility trench bedding.
2. GE has proposed to collect several additional samples to further characterize non-PCB constituents (those listed in Appendix IX of 40 CFR 264, plus benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine, referred to as Appendix IX+3). GE shall add and/or relocate Appendix IX+3 samples as follows:
 - a. Relocate proposed sample location RAA13-H93 (1- to 3-ft and 10- to 15-ft depth intervals), to location G92, where elevated lead and dioxins were detected in the upper foot.
 - b. Collect an Appendix IX+3 sample at location RAA13-Z88 (3- to 6-ft depth interval), to fill a horizontal data gap on the western portion of Parcel J9-23-12 at this depth interval. This sample may be analyzed for Appendix IX+3 semi-volatile organic compounds (SVOCs), dioxins/furans, and metals only.
 - c. Collect Appendix IX+3 samples at grid location RAA13-F91, from the 1- to 3-ft and 3- to 6-ft depth intervals, to better characterize this area and to provide information for evaluating the City of Pittsfield parcel. (This sample location was previously requested, however, GE recommended deleting it, as they believed the utility corridor was within an easement that would not be separately characterized.)

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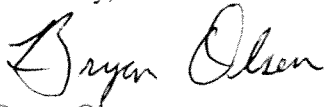
3. In Figures 3 through 8, GE has identified an area "subject to installation of a vegetative engineered barrier and natural resource restoration/enhancement plantings." The SOW states that the portion of Newell Street Area II that will be subject to a vegetative engineered barrier will "consist of the existing parking lots owned by GE (including both paved and unpaved properties)" (SOW, p.47) and does not specifically identify the area to be subject to the barrier. To avoid any confusion, GE shall clarify and illustrate the extent of the proposed vegetative engineered barrier, in order that samples located near the proposed barrier's boundary are appropriately addressed in RD/RA evaluations.
4. Preliminary review of Appendix IX+3 sample analytical results identified several locations outside the proposed vegetative barrier for which GE may need to collect supplemental samples to support the RD/RA evaluation. The constituents and areas that may require supplemental samples may include:
 - a. Elevated lead concentrations are reported for samples from borings in the eastern portion of Parcel J9-23-12 indicate that the areas of lead contamination from the adjacent Newell Street Area I RAA extend into the Newell Street Area II (NSAII) RAA. For example, elevated lead was reported in samples from the following borings: RAA13-C3, RAA13-C5, NS-24B, and SL0475.
 - b. Elevated lead concentrations are reported for samples from locations RAA13-G92 and SL0124.
 - c. Elevated dioxin/furan concentrations are reported for samples from locations RAA13-A97 (14 ppb, upper foot), RAA13-B90 (43 ppb, 1- to 3-ft depth interval), and SL0124 (32 ppb, upper 0.5-ft).
5. EPA has the following comments on Tables and Figures:
 - a. Table 2 - The analytical results for sample RAA13-1 (21- to 23-ft depth interval) shall be removed, as the sample depth interval is not applicable.
 - b. Table 4 - The following samples and their analytical results shall be removed, as all parameters are listed as "NS" (not sampled) and/or "R" (rejected): NS-1A (12- to 14-ft depth interval), NS-7 (2- to 4-ft depth interval), NS-9 (4- to 6-ft depth interval). Similarly, samples NS-7 (14- to 16-ft depth interval) and NS-33 (12- to 14-ft depth interval) only had common laboratory contaminants reported, and could be excluded in the RD/RA evaluation.
 - c. Figure 2 - In subsequent documents, GE shall clarify the ownership status for three parcels that GE has indicated "GE owned or in the process of purchasing." In a letter dated March 20, 2003, addressed to Mr. Bryan Olson, EPA, GE does not include these in a listing of non-GE-owned properties.
 - d. Figure 3 - Sample location RAA13-B79 shall be added to the figure.
 - e. Figure 7 - The location of EPA sample NS-29 shall be added to the figure.
 - f. Figure 8 - The notations for the following sample locations shall be corrected: NS-11, indicates that data are available for volatile organic compounds (VOCs) and SVOCs, however, only VOC data are reported; and NS-14 indicates that VOC data are available, however, Table 4 reports VOCs as not sampled.

Within two weeks of the date of this letter, GE shall submit a letter to EPA (including relevant tables and figures) that incorporates the comments presented herein and provides an updated proposal for future activities proposed in the PDI Reports. Within 90 days of EPA's approval of that proposal, GE shall submit the Supplemental PDI Report.

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/Housatonic Team Leader

cc: Dick Gates, GE
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