



Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue, Pittsfield, MA 01201

05-0113

SDMS 43753

Transmitted Via Facsimile and Overnight Delivery

May 5, 2003

Mr. Bryan Olson
EPA Project Coordinator
U.S. Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
Newell Street Area II (GECD450)
Response to EPA's April 21, 2003 Conditional Approval Letter for the Pre-Design
Investigation Report**

Dear Mr. Olson:

In February 2003, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a document titled *Pre-Design Investigation Report for Newell Street Area II Removal Action* (PDI Report). The PDI Report summarized the pre-design soil investigations performed by GE (and EPA, to a lesser extent) within Newell Street Area II, and it evaluated the sufficiency of the data resulting from those investigations, in combination with data available from prior soil investigations, to support the development of a Conceptual Removal Design/Removal Action (RD/RA) Work Plan for this Removal Action. Based on an evaluation of those data, the PDI Report identified the need for the collection and analysis of several additional soil samples for polychlorinated biphenyls (PCBs) and/or non-PCB constituents listed in Appendix IX of 40 CFR Part 264 (excluding pesticides and herbicides), plus three additional constituents (benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine) (Appendix IX+3).

Following submittal of the PDI Report, EPA issued a conditional approval letter dated April 21, 2003, approving the PDI Report subject to certain conditions. In that letter, EPA directed GE to submit (within 14 days) a letter addressing the conditions in EPA's letter, and confirming the additional sampling activities and sampling/reporting schedule.

This letter addresses each of the conditions in EPA's April 21, 2003 conditional approval letter and presents the proposed schedule for the performance of this supplemental soil sampling and other pre-design activities that were identified in the PDI Report. It also provides an update regarding whether the non-GE owners at Newell Street Area II will agree to Grants of Environmental Restrictions and Easements (EREs) on their properties.

A. Supplemental Soil Sampling

Two of the conditions in EPA's April 21, 2003 conditional approval letter relate specifically to the proposed scope of the supplemental soil sampling and are addressed below.

1. In Condition 1 of its April 21 letter, EPA directed GE to ensure that the proposed sampling at locations RAA13-C88 and RAA13-Z90, which is intended to better characterize the PCBs in the soils for utility bands associated with the 20-inch and 48-inch sewer lines, will extend vertically to represent the depth of the bottom of the utility trench bedding material. GE subsequently contacted the City of Pittsfield Engineer who indicated that utility trench bedding can extend two feet below the invert of the utility pipe. To assure adequate coverage for the 20-inch sewer line to include the depth to utility bedding material, GE will extend the boring depth at RAA13-C88 from seven feet to nine feet, and soil samples will be collected from the 1- to 3-foot, 3- to 6-foot and 6- to 9-foot depth increments for analysis of PCBs. For the 48-inch sewer line and for the same reason described above, the soil boring at sample location RAA13-Z90 will be extended to a depth of 15 feet (instead of the originally proposed 12 feet), and soil samples will be collected from the 1- to 3-foot, 3- to 6-foot, 6- to 10-foot, and 10- to 15-foot depth increments for analysis of PCBs.
2. Condition 2 of EPA's April 21, 2003 letter requires GE to add and/or relocate certain soil samples for Appendix IX+3 analysis. In response to that condition, the following changes will be made to the scope of the proposed Appendix IX+3 soil sampling:
 - a. Samples previously proposed for location RAA13-H93 (at the 1- to 3-foot and 10- to 15-foot depth increments) will now be collected from location RAA13-G92. The 1- to 3-foot sample will be analyzed for all Appendix IX+3 constituents (excluding pesticides and herbicides), and the 10- to 15-foot sample will be analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and inorganics. The latter sample will not be analyzed for polychlorinated dibenzo-p-dioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) since PCDD/PCDF data at this depth already exist at location RAA13-H93.
 - b. A soil sample will be collected from the 3- to 6-foot depth increment at location RAA13-Z88 and analyzed for SVOCs, inorganics, and PCDDs/PCDFs.
 - c. Soil samples will be collected from the 1- to 3-foot and 3- to 6-foot depth increments at location RAA13-F91 and analyzed for Appendix IX+3 constituents.

Table 1, attached to this letter, reflects the revised scope of supplemental pre-design sampling, showing the supplemental sampling locations, depths, and analyses identified in the PDI Report with the changes described above. Additionally, revised Figures 4 through 8 illustrate the currently proposed supplemental Appendix IX+3 sampling locations, along with the existing Appendix IX+3 soil sample locations from investigations previously performed either as part of or prior to the pre-design investigations. Except as noted in this letter, the procedures and methodologies described in the PDI Report for the supplemental sampling activities will remain unchanged.

B. Miscellaneous Conditions

1. In its Condition 3, EPA directed GE to clarify and illustrate the extent of the proposed vegetative engineered barrier in the GE parking lot area. In response, the currently anticipated extent of that barrier is identified on Figures 4 through 8 with gray shading. Following completion of the remaining pre-design soil investigations, as well as the detailed survey described in the PDI Report, GE will, as part of future RD/RA activities, more specifically delineate the area to be subject to the barrier.
2. Condition 4 of EPA's letter states that "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 evaluations." A review of those locations listed by EPA identified several locations (i.e., RAA13-C3, RAA13-C5, NS-24(B), and SL0475) that are located within the boundaries of the vegetative engineered barrier as defined in the comment above and illustrated on Figures 4 through 8. For the remaining locations identified by EPA, GE will, as part of future RD/RA evaluations, evaluate the need for additional sampling to further delineate the extent of elevated lead or PCDD/PCDF concentrations.
3. In Condition 5 of its letter, EPA provided comments on some of the tables and figures in the PDI Report and directed GE to make certain changes or clarifications to those tables and figures. GE will make those changes, as appropriate, in the tables and figures to be included in the forthcoming Supplemental Pre-Design Investigation Report (Supplemental PDI Report) described below. In addition, in response to EPA's Comment 5.c, GE notes that all recreational parcels identified on Figure 2 of the PDI Report as "GE owned or in the process of purchasing" are now owned by GE. Finally, the changes that EPA requested to Figures 7 and 8 are also reflected on the revised figures attached to this letter.

C. Schedule

The Supplemental PDI Report will be submitted within 90 days from receipt of EPA approval of this letter. This schedule assumes that no unforeseeable delays are encountered. If weather or other factors cause a delay in the schedule proposed above, GE will notify EPA and propose a revised schedule for submitting the Supplemental PDI Report.

D. ERE Notification

In a letter to EPA dated March 20, 2003, GE explained the status of the five non-GE owned parcels at Newell Street Area II with respect to whether the owners would agree to EREs, and requested an extension of time until one month after submission of the Supplemental PDI Report to provide its written notice on this issue. In the meantime, however, GE has obtained additional information on this matter such that it can provide the following notice at this time:

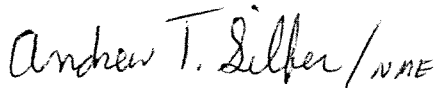
- Two of these properties (Parcel J9-23-2 and a strip of land on which overhead electric utility lines and a sanitary sewer line are located) are owned by the City of Pittsfield, which has agreed in the CD to execute EREs on its properties at the CD Site where necessary.
- Two other parcels (Parcels J9-23-6 and J9-23-8) are owned by the Western Massachusetts Electric Company (WMECo). In June 2002, GE wrote a letter to WMECo providing information regarding its option as to whether to agree to EREs or accept a Conditional Solution, and offering to pay WMECo 18% of the assessed value of these properties in exchange for EREs, as required by the CD.

Thereafter, GE discussed this matter with WMECo on several occasions. On March 24, 2003, WMECo advised GE verbally that it had decided not to execute EREs on its properties at Newell Street Area II and instead to accept the Conditional Solution option. This was confirmed in a letter dated April 30, 2003 to GE from Northeast Utilities on behalf of WEMCo.

- The fifth parcel (Parcel J9-23-4) was previously owned by an individual who has died, and it is apparently in the process of being taken by the City for non-payment of property taxes. Despite several efforts, GE has been unable to identify or reach any individual or entity with an ownership interest in this parcel in order to inquire as to whether the owner would agree to an ERE. In this situation, GE intends to implement a Conditional Solution at this parcel.

Please contact Richard Gates or me with any questions.

Sincerely,



Andrew T. Silfer, P.E.

GE Project Coordinator

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NME/csc

Attachments

cc: Tim Conway, EPA
Holly Inglis, EPA
Michael Nalipinski, EPA
Rose Howell, EPA
Susan Steenstrup, MDEP
Susan Keydel, MDEP
Alan Weinberg, MDEP *
Robert Bell, MDEP *
Thomas Angus, MDEP *
K.C. Mitkevicius, USACE
Dawn Jamros, Weston
Nancy E. Harper, MA AG *
Dale Young, MA EOE
Mayor Sara Hathaway, City of Pittsfield

Pittsfield Department of Health
Michael Carroll, GE *
Richard Gates, GE
Rod McLaren, GE *
James Nuss, BBL
James Bieke, Shea & Gardner
Charles Dooley, WMECo
Barbara Charest, Northeast Utilities
Charles Nicol, Northeast Utilities
Public Information Repositories
GE Internal Repository

(* without attachments)

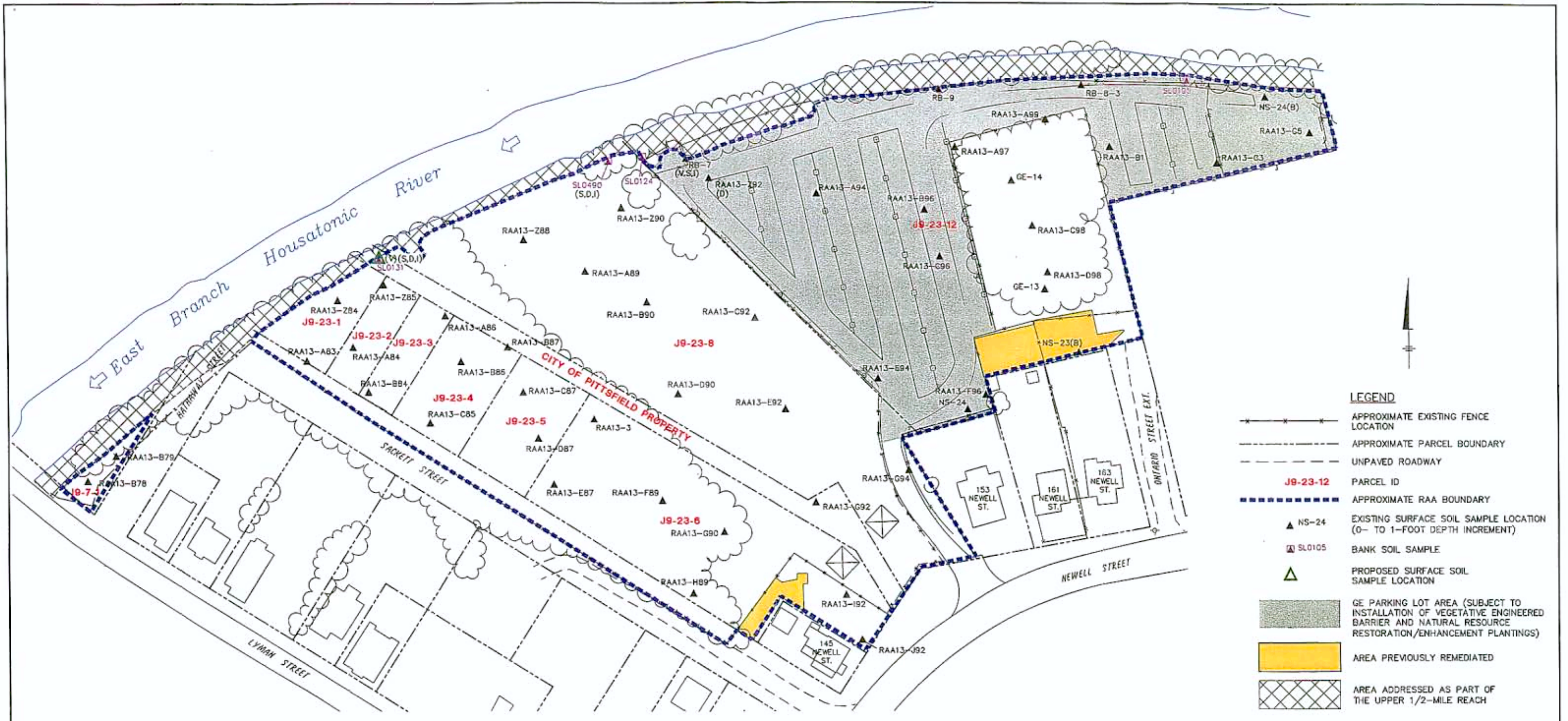
**TABLE 1
PROPOSED SUPPLEMENTAL PRE-DESIGN INVESTIGATION SOIL SAMPLING**

**RESPONSE TO EPA'S APRIL 2003 CONDITIONAL APPROVAL LETTER FOR THE NEWELL STREET AREA II PRE-DESIGN INVESTIGATION REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Parcel ID	Sample ID	Sample Depth (feet)	Nearest Grid Coordinate	Analyses To Be Performed					Rationale
				PCBs	VOCs	SVOCs	Inorganics	PCDD/PCDF	
City of Pittsfield	RAA13-C88	1-3	C88	X	X	X	X	X	PCB Characterization of Utility Band (20-inch Sanitary Sewer) and Non-PCB Appendix IX Characterization
		3-6	C88	X	--	--	--	--	PCB Characterization of Utility Band (20-inch Sanitary Sewer) and Non-PCB Appendix IX Characterization
		6-9	C88	X	X	X	X	--	PCB Characterization of Utility Band (20-inch Sanitary Sewer) and Non-PCB Appendix IX Characterization
	SL0131	0-1	Z85	--	X	--	--	--	Non-PCB Appendix IX Characterization
	RAA13-G92	1-3	G92	--	X	X	X	X	Non-PCB Appendix IX Characterization
		10-15	G92	--	X	X	X	--	Non-PCB Appendix IX Characterization
	RAA13-F91	1-3	F91	--	X	X	X	X	Non-PCB Appendix IX Characterization
		3-6	F91	--	X	X	X	X	Non-PCB Appendix IX Characterization
J9-23-8	RAA13-Z90	1-3	Z90	X	--	--	--	--	PCB Characterization of Utility Band (48-inch Sewer Line)
		3-6	Z90	X	--	--	--	--	PCB Characterization of Utility Band (48-inch Sewer Line)
		6-10	Z90	X	--	--	--	--	PCB Characterization of Utility Band (48-inch Sewer Line)
		10-15	Z90	X	--	--	--	--	PCB Characterization of Utility Band (48-inch Sewer Line)
	RAA13-Z88	3-6	Z88	--	--	X	X	X	Non-PCB Appendix IX Characterization at Parcel J9-23-12

Notes:

1. -- = No analyses are proposed.
2. X = Analyses are proposed.



- LEGEND**
- APPROXIMATE EXISTING FENCE LOCATION
 - - - APPROXIMATE PARCEL BOUNDARY
 - - - UNPAVED ROADWAY
 - J9-23-12 PARCEL ID
 - APPROXIMATE RAA BOUNDARY
 - ▲ NS-24 EXISTING SURFACE SOIL SAMPLE LOCATION (0- TO 1-FOOT DEPTH INCREMENT)
 - ▲ SLO105 BANK SOIL SAMPLE
 - ▲ PROPOSED SURFACE SOIL SAMPLE LOCATION
 - GE PARKING LOT AREA (SUBJECT TO INSTALLATION OF VEGETATIVE ENGINEERED BARRIER AND NATURAL RESOURCE RESTORATION/ENHANCEMENT PLANTINGS)
 - AREA PREVIOUSLY REMEDIATED
 - AREA ADDRESSED AS PART OF THE UPPER 1/2-MILE REACH

- NOTES:**
- THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
 - CERTAIN SAMPLING LOCATIONS HAVE BEEN SURVEYED TO KNOWN PHYSICAL FEATURES BY BLASLAND, BOUCK & LEE, INC. AND HILL ENGINEERS, ARCHITECTS, PLANNERS, INC. ALL SAMPLING LOCATIONS SHOWN ON THIS MAPPING ARE APPROXIMATE. HOWEVER SURVEY DATA ARE AVAILABLE FOR CERTAIN OF THESE SAMPLING LOCATIONS TO IDENTIFY PRECISE LOCATIONS.
 - LIMITS OF BUILDINGS, PROPERTY BOUNDARIES, AND ROADS ARE APPROXIMATE.
 - SOIL SAMPLES HAVE AND/OR WILL BE ANALYZED FOR ALL APPENDIX IX+3 CONSTITUENTS (EXCLUDING PESTICIDES AND HERBICIDES) UNLESS OTHERWISE INDICATED IN PARENTHESIS. THE CONSTITUENT GROUPS ARE:
 V = VOLATILE ORGANIC COMPOUNDS (VOCs)
 S = SEMI-VOLATILE ORGANIC COMPOUNDS (SVOCs)
 D = POLYCHLORINATED DIBENZO-P-DIOXINS (PCDDs) AND POLYCHLORINATED DIBENZOFURANS (PCDFs)
 I = INORGANICS
 - (B) = DIFFERENTIATES BORING LOCATIONS WHERE SAMPLES WERE COLLECTED IN JUNE 1995 FROM IDENTICALLY IDENTIFIED SURFACE LOCATIONS WHERE SAMPLES WERE COLLECTED IN OCTOBER 1993.

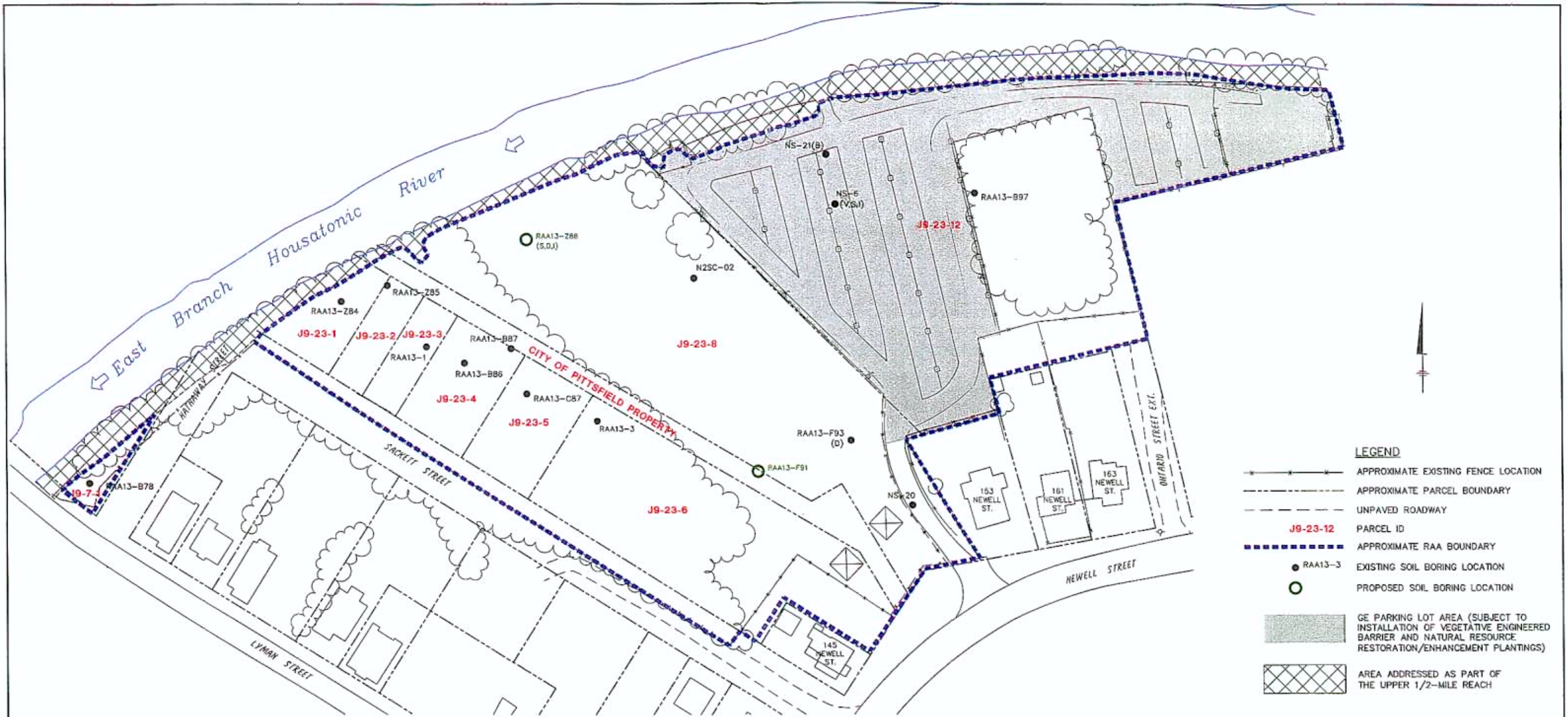
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA II

EXISTING AND PROPOSED APPENDIX IX+3 SOIL SAMPLE LOCATIONS (0- TO 1-FOOT DEPTH INCREMENT)

BBL
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engineers & scientists

FIGURE
4

X: 301930.DWG
L: 01-11 OFF-REP, *GND*
P: PAGESET/PLT-01
S/S/03 SVR-85-DJP DJP GMS
N/30193001/301930.DWG



- LEGEND**
- APPROXIMATE EXISTING FENCE LOCATION
 - - - APPROXIMATE PARCEL BOUNDARY
 - - - UNPAVED ROADWAY
 - J9-23-12 PARCEL ID
 - APPROXIMATE RAA BOUNDARY
 - RAA13-3 EXISTING SOIL BORING LOCATION
 - PROPOSED SOIL BORING LOCATION
 - █ GE PARKING LOT AREA (SUBJECT TO INSTALLATION OF VEGETATIVE ENGINEERED BARRIER AND NATURAL RESOURCE RESTORATION/ENHANCEMENT PLANTINGS)
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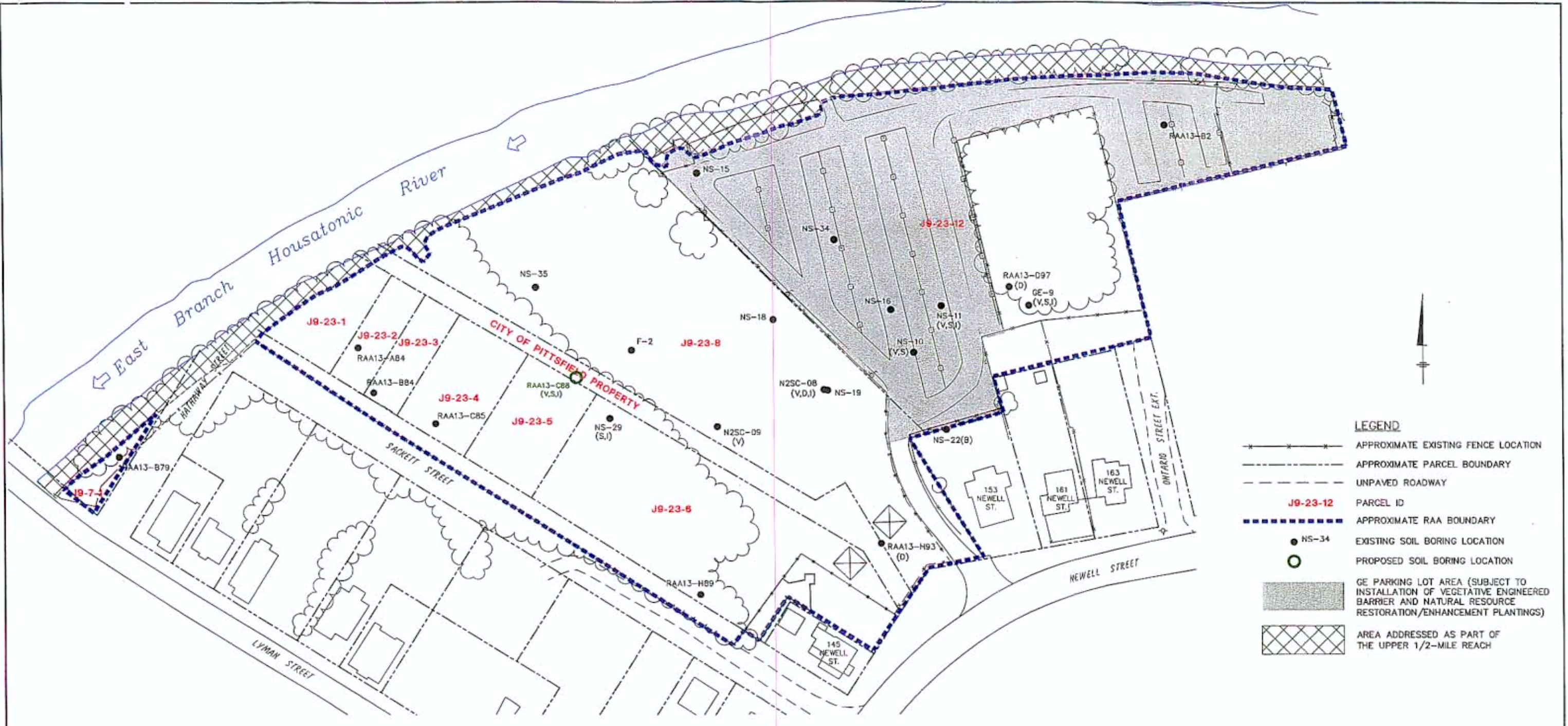
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA II

**EXISTING APPENDIX IX+3 SOIL
SAMPLE LOCATIONS (3- TO 6-FOOT
DEPTH INCREMENT)**

BBL
BLASLAND, BOUCK & LEE, INC.
engineers & scientists

FIGURE
6

2: 30193010.DWG
L: 04-01, OFF-REV, GRD*
E: JIC, JIC-PREV
P: PAGES/PLT-DL
S/S/03 STR-54-S.P. DWG CWS
N/30193001/30193032.DWG



- LEGEND**
- APPROXIMATE EXISTING FENCE LOCATION
 - - - APPROXIMATE PARCEL BOUNDARY
 - - - UNPAVED ROADWAY
 - J9-23-12 PARCEL ID
 - APPROXIMATE RAA BOUNDARY
 - NS-34 EXISTING SOIL BORING LOCATION
 - PROPOSED SOIL BORING LOCATION
 - █ GE PARKING LOT AREA (SUBJECT TO INSTALLATION OF VEGETATIVE ENGINEERED BARRIER AND NATURAL RESOURCE RESTORATION/ENHANCEMENT PLANTINGS)
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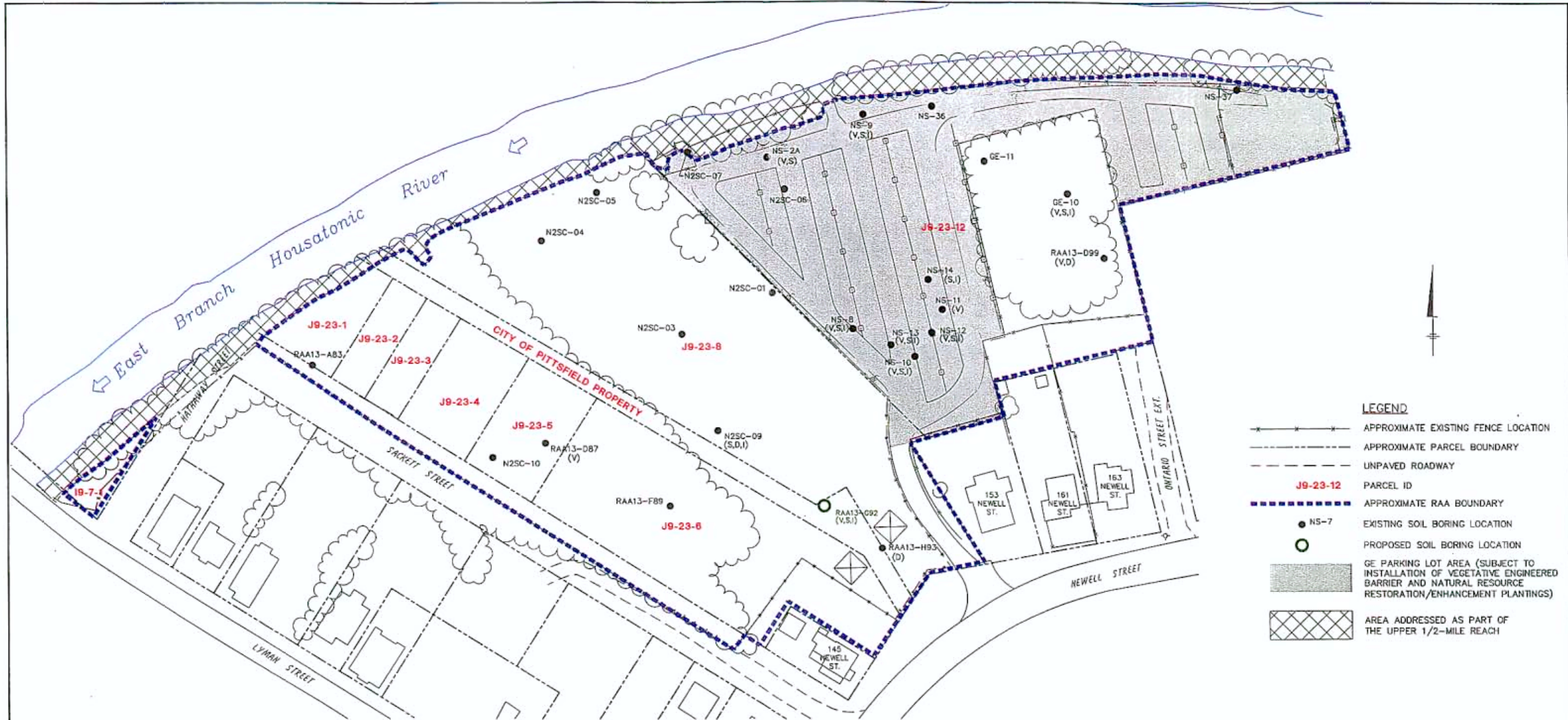
GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
 NEWELL STREET AREA II

EXISTING AND PROPOSED APPENDIX IX+3 SOIL SAMPLE LOCATIONS (6- TO 10-FOOT DEPTH INCREMENT)

BBL
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 engineers & scientists

FIGURE 7

X: 30193X10.DWG
 U: DN=*, OFF=REF*, *GRID,
 EXC, EXC-PREV
 P: PAGESET/PLT-DL
 S:/03 5/95-05-DJP DWW DWS
 W/30193001/30193033.DWG



LEGEND

- APPROXIMATE EXISTING FENCE LOCATION
- - - APPROXIMATE PARCEL BOUNDARY
- - - UNPAVED ROADWAY
- J9-23-12 PARCEL ID
- APPROXIMATE RAA BOUNDARY
- NS-7 EXISTING SOIL BORING LOCATION
- PROPOSED SOIL BORING LOCATION
- GE PARKING LOT AREA (SUBJECT TO INSTALLATION OF VEGETATIVE ENGINEERED BARRIER AND NATURAL RESOURCE RESTORATION/ENHANCEMENT PLANTINGS)
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 - I = INORGANICS



X: 30193010.DWG
 L: CM=*, OFF=REF*, *GRD,
 EXC, EXC-PREV
 P: PAGESET/PL1-01
 5/5/03 STR-05-DJP SHW CWS
 W/30193001/30193034.DWG

GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
 NEWELL STREET AREA II

EXISTING AND PROPOSED APPENDIX IX+3 SOIL SAMPLE LOCATIONS (10- TO 15-FOOT DEPTH INCREMENT)

BBL
 BLASLAND, BOUCK & LEE, INC.
 engineers & scientists

FIGURE
8