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

June 5, 2000

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State Project Coordinator
Section Chief, Special Projects
Bureau of Waste Site Cleanup
Department of Environmental Protection
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**Re: GE-Pittsfield/Housatonic River Site
Upper ½ Mile Reach Removal Action (GECD800)
DNAPL Report and Response Measures**

RECEIVED
JUN 09 2000

BY:

Dear Mr. Olson and Ms. Cutler:

Pursuant to Paragraph 70 of the Consent Decree for the GE-Pittsfield/Housatonic River Site, this letter constitutes the written report of the General Electric Company setting forth the events that occurred and the measures taken in response to the discovery and reporting of PCB-containing dense non-aqueous phase liquid (DNAPL) in Cell F1 during the Upper ½ Mile Reach Removal Action. Also pursuant to Paragraph 70 of the Consent Decree, this letter constitutes GE's written report following conclusion of this event setting forth the response actions taken by GE.

On May 14, 2000, during remediation of Cell F1, GE visually observed a small amount of DNAPL of unknown composition in that cell, apparently leaking through a joint in the sheetpiling from the adjacent area on the north side of the River. On May 15, 2000, GE bermed, with sandbags, an area of approximately 4 feet by 8 feet to isolate the DNAPL area. Also on that day, GE collected a sample of the DNAPL for analysis.

On May 16, 2000, GE installed four borings in Cell F1, ranging from 4 to 6 feet deep, in the area of the DNAPL. The purpose of these borings was to determine the lateral extent of the DNAPL. Three of the borings were installed around the perimeter of the DNAPL area, and one boring was placed as close as possible to the DNAPL itself. Based on these borings and the visual evidence, GE determined preliminarily that the DNAPL was in fact migrating from the adjacent area of the River north of the sheetpiling (which is Cell G1 for this Removal Action), rather than emerging from a source in Cell F1.

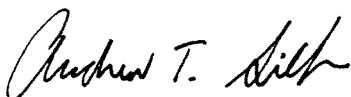
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On the afternoon of May 16, 2000, GE received preliminary analytical data on the composition of the DNAPL. PCB Aroclor 1260 was found at a concentration of 350,000 ppm, chlorobenzene was found at 1270 ppm, 1,2,4-trichlorobenzene was found at 235,000 ppm, and 1,4-dichlorobenzene was found at 6050 ppm. No other VOCs or SVOCs were found above their respective detection limits. Based upon these analytical data, and GE's observation that 1-2 gallons of DNAPL had collected in Cell F1, GE calculated that PCBs in the DNAPL appeared to exceed the CERCLA reportable quantity of 1 pound in a 24-hour period, *see* 40 C.F.R. § 302.4. GE immediately called the National Response Center to report this information. The NRC assigned report #529150 to the incident. GE also orally advised the EPA Project Coordinator, Bryan Olson, and the Massachusetts Project Coordinator, J. Lyn Cutler, of these results.

On May 17, 2000, GE commenced and completed excavation of the DNAPL area per the Work Plan for the Upper ½ Mile Reach Removal Action. GE excavated a two-foot deep area of approximately 3 feet by 3 feet in the area where the DNAPL had been found. Visual observation confirmed that the DNAPL was not emerging from the bottom of the excavated area, but rather was migrating laterally from the joint in the sheetpiling. GE placed bentonite pellets against the joint in the sheetpiling to seal it off. GE continued its observation of the DNAPL area throughout the afternoon of May 17, and confirmed that the seal had effectively sealed off the source of the migration from the Cell G1 area. After observing the area, EPA oversight personnel approved the continuation of the restoration of Cell F1, and GE proceeded with that restoration. As an additional precaution, GE placed an extra layer of fabric in the DNAPL excavation area, and backfilled with additional isolation material. After the excavated area was filled to grade, GE placed fabric over the entire surface of Cell F1 as part of the planned restoration of the cell. The restoration of Cell F1 was completed on May 19. EPA oversight personnel were present throughout the process of remediation of the DNAPL in Cell F1.

As discussed above, GE has completed its actions in Cell F1 in response to the discovery of DNAPL. This report does not address possible actions that may be required to address such DNAPL in Cell G1 as work progresses in that cell.

Sincerely yours,



Andrew T. Silfer
GE Project Coordinator

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