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**United States Environmental Protection Agency**  
**EPA New England**  
**One Congress Street, Suite 1100**  
**Boston, MA 02114-2023**

D.V.

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**WESTON Ref. No.**  
**08-0009**

July 28, 2000

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

**RE: Recommendation to Perform Additional DNAPL Investigative Activities**  
**Upper ½-Mile Reach Removal Action**  
**General Electric-Housatonic River Site, Pittsfield, Massachusetts**

Dear Mr. Silfer:

The purpose of this letter is to document recent conversations between GE and EPA regarding the potential for uncovering additional DNAPL in the Upper ½-Mile Reach and to document EPA's recommended investigation activities. As you know, GE has encountered DNAPL in three cells during the implementation of the Upper ½-Mile Reach Removal Action. In all three instances, GE has submitted letters to EPA asserting the discovery of DNAPL could potentially constitute a "force majeure" event under the Consent Decree and as such, may delay the completion of the Upper ½-Mile Reach Removal Action.

Based on the results of source control investigative activities, historical information, and the discovery of DNAPL in three excavation cells, EPA continues to believe the potential for uncovering DNAPL in future excavation cells is significant. In fact, in EPA's February 10, 2000 letter regarding GE's January 7, 2000 estimated timetable for the Upper ½-Mile Reach Removal Action, EPA recommended that

"GE anticipate and plan for . . . the following potential scenarios: The presence of DNAPL that requires additional excavation of sediments and/or bank soils. . . ."

By this letter, EPA reiterates its recommendation that GE adequately anticipate and plan for the presence of DNAPL in the remaining sections of the Upper ½-Mile Reach Removal Action.

Specifically, EPA recommends that, at a minimum, GE perform the following investigative activities:

- Install lower bank borings and/or piezometers in areas where there may be a DNAPL source to the River emanating from the adjacent riverbanks. These areas include, but may not be limited to, riverbanks abutting the Newell Street II portion of the Site and the area from Cell G1 to the Building 68 Area (including the area where former Oxbow H intersects the River).
- Adjacent to the Lyman Street Area of the Site, where the presence of DNAPL very near the riverbank's edge has been documented, install deep borings within the River sediments to look for the presence of DNAPL. Although GE is required to install impermeable, metal sheetpile along the riverbank in this area, the presence of DNAPL within the River channel itself may require additional response actions.
- In the unexcavated sediments adjacent to where DNAPL was uncovered during the Building 68 Removal Action, install deep borings within the River sediments to look for the presence of DNAPL.
- Install deep River borings in other areas of the River channel where the current information indicates that DNAPL may be present. For example, where the former oxbows intersect with the current River channel and adjacent to the Newell Street II portion of the Site.

Performing these investigative activities prior to excavating banks and sediments in these areas may give GE additional time to plan DNAPL response actions, if necessary, and may reduce the schedule impacts should additional DNAPL be uncovered. Additional recommendations to minimize the schedule impacts posed by the presence of DNAPL (and delays caused by other factors) were also included in EPA's February 10, 2000 letter to GE.

I look forward to your response.

If you have any questions, please contact me at (617) 918-1282 or (413) 236-0969.

Sincerely,



Dean Tagliafero  
On-Scene Coordinator

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