June 22, 2000

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

Bryan Olson
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EPA New England
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J. Lyn Cutler
State Project Coordinator
Section Chief, Special Projects
Bureau of Waste Site Cleanup
Department of Environmental Protection
436 Dwight Street
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Re: GE-Pittsfield/Housatonic River Site
Upper ½ Mile Reach Removal Action (GECD800)
DNAPL Report and Response Measures – Cell G1

Dear Mr. Olson and Ms. Cutler:

Pursuant to Paragraph 70 of the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site, this letter constitutes the written report of the General Electric Company (GE) setting forth the events that occurred and the measures taken to date in response to the discovery and reporting of PCB-containing dense non-aqueous-phase liquid (DNAPL) in Cell G1 during the Upper ½ Mile Reach Removal Action.

On May 25, 2000, during remediation of Cell F1, GE visually observed a small amount of DNAPL of unknown composition in that cell, although no substantial oil was observed on the sediment surface. Following the Memorial Day holiday weekend (when no work or dewatering was conducted), excavation began in Cell G1 on May 30, and DNAPL was again observed. On that date, GE began pumping water from Cell G1 to the 500,000-gallon water storage tank and from there to the 64G water treatment facility. In addition, a sample of the DNAPL was collected for analysis.

On May 31 and June 1, pockets of DNAPL were observed in Cell G1 during sediment and bank soil excavation at a location near bypass outfall No. 05B from the GE facility. An additional one foot of excavation was performed in an area of 20' by 40' in the portion of Cell G1 where the DNAPL was observed.

On June 2, GE received the analytical results from the May 30 DNAPL sample. These results showed PCB Aroclor 1260 at 449,000 ppm, chlorobenzene at 226 ppm, 1,2,4-trichlorobenzene at 152,000 ppm, and no other detected volatile or semi-volatile organic compounds. Based upon these analytical data, and GE's observation of the amount of DNAPL that had collected in Cell G1, GE calculated that PCBs in the DNAPL might 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 #530819 to the incident. GE also orally advised the EPA Project Coordinator, Bryan Olson, and the Massachusetts Project Coordinator, J. Lyn Cutler, of these results, as well as Susan Steenstrup of MDEP and Dean Tagliaferro of EPA.

On Monday, June 5, 2000, after consultation with EPA, GE installed 12 borings in the bottom of Cell G1 to better understand the extent of the DNAPL. Three of these borings revealed staining and odors. On June 6, GE installed four more borings along the riverbank in the DNAPL area. One of these borings revealed the presence of DNAPL, while the other three did not. On the afternoon of June 6, GE reviewed the boring results with EPA and its contractor and agreed to install seven more borings (five on the bank and two in the sediment) to further define the extent of the DNAPL. Throughout this period, GE continued pumping water from Cell G1 to the 500,000-gallon storage tank and then to the 64G treatment facility.

Before the additional borings could be installed, work in Cell G1 was halted by a major flood event that began on the evening of June 6 and continued throughout June 7. This event caused the floodwaters to overtop the sheetpiles and erode a large portion of the bank near the sheeting at the upstream end of the cell, and thus flooded out Cell G1.

By Thursday June 8, the river elevation had fallen below the top of the sheetpiling, but water continued to enter Cell G1 through the scour breach near the upstream sheetpiling. The high water in the cell on June 7 and 8 precluded work in the cell on those days. On June 9, GE installed 25 linear feet of new sheetpiling at the upstream cutoff wall to seal the scour breach and re-isolate Cell G1. However, additional rain on Sunday June 11 and Tuesday June 13 caused Cell G1 to fill with water via the 30-inch outfall bypass pipe from the 64W oil/water separator. Hence, no work could be performed in Cell G1 on June 12 or 13.

Two soil borings were installed at the top of the bank on June 12. Finally, on June 14, the cell was sufficiently dewatered that GE was able to install the remaining 5 additional borings agreed upon with EPA to further define the extent of DNAPL in Cell G1. A total of 23 borings have been installed to date in the sediments and bank soils at Cell G1. GE also, in cooperation with EPA, installed four borings on June 16 on the bank adjacent to Cell G2 to further define the extent of the DNAPL. Currently, GE is compiling the boring results and the related analytical data obtained from the 27 borings installed to date. GE will be continuing to discuss this situation with EPA and will propose an appropriate remedial measure to address this area shortly. GE will describe the results of its ongoing efforts when it submits its report, pursuant to Paragraph 70 of the CD, following conclusion of these efforts.

Sincerely yours,

William A Horne / for

Andrew T. Silfer, P.E.
GE Project Coordinator

cc: Tim Conway, EPA
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