



08-0005

December 19, 2000

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

Dean Tagliaferro
On Scene Coordinator
U.S. Environmental Protection Agency
c/o Weston Environmental ENgineering
One Lyman Street
Pittsfield, Massachusetts 01201

**Re: GE-Pittsfield/Housatonic River Site
Upper ½-Mile Reach Removal Action (GEC800)
Contingency Plan for NAPL remaining in Cell G2**

Dear Mr. Tagliaferro:

On November 17, 2000, the General Electric Company (GE) submitted a document entitled *Results of Cell G2 NAPL Investigation and Proposal to Address Presence of LNAPL in Cell G2* to the United States Environmental Protection Agency (EPA). This submittal presented the results of an investigation conducted to delineate the extent of NAPL encountered during sediment and bank soil removal activities in Cell G2 as part of the Upper ½-Mile Reach Removal Action. Additionally, the submittal included a proposal to address the presence of coal-tar LNAPL that was encountered in Cell G2. The proposal involved additional excavation of the coal-tar LNAPL-impacted materials and the installation of a sheetpile containment barrier wall. In a December 11, 2000 letter, the EPA provided GE interim conditional approval for a portion of the proposal. One of the conditions required GE to submit a contingency plan to install a NAPL collection system and/or impermeable cap in the event that NAPL or NAPL-impacted sediments remain following excavation activities. Please note that given the nature of the LNAPL observed in Cell G2 the installation of any collection system and/or impermeable cap in the river may have limited effectiveness. Regardless, in response to the above-referenced EPA requirement, this letter has been prepared to present a proposed contingency plan.

GE's proposed contingency plan is to install an LNAPL observation/recovery well and impermeable cap system in the Cell G2 area if LNAPL remains following excavation of sediments to a maximum depth of 965 feet above mean sea level (AMSL) (or to the maximum safe excavation limits). Figure 1 provides a conceptual design for a LNAPL observation/recovery well and impermeable cap system. Please note that since this is a contingency plan and the location and extent of any LNAPL remaining is not known, the construction of the proposed system may be subject to field modification, in consultation with EPA.

Specifically, in the event that LNAPL remains following excavation activities, a gravel layer will be constructed in the impacted area sloping upward towards the containment barrier sheeting and the observation/recovery well (see Figure 1). This system is similar in construction to the system used in Cell C except that the gravel layer and geomembrane will be sloped to allow potential LNAPL to migrate upward toward the containment barrier and the observation/recovery well. For the observation/recovery well, an approximate one-foot length of 0.090-slotted screen will be placed into a minimum 1-foot of washed gravel. Following placement of the washed gravel, a 60-mil high-density polyethylene (HDPE) liner will be placed.

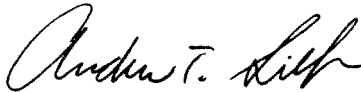
Dean Tagliaferro
December 19, 2000
Page 2

In the event that the HDPE liner is required to be placed in sections, these sections will be welded in accordance with manufacturer specifications and/or recommendations. Also, the HDPE liner will be sealed around the 12-inch diameter protective casing and along the sheeting using an approximate 2-foot wide, 1-foot thick layer of grout. The remaining sides of the liner will be keyed into the subgrade and grouted. The protective casing, along the recovery pipe, will stick up approximately 2 feet above final grade. The protective casing will be anchored to the sheeting using pipe collars and plugged at the top to protect the pipe during a high flow event. The annulus between the 12-inch diameter protective casing and the 6-inch diameter pipe will be filled with grout. Isolation layer material will be placed above the HDPE and the remainder of the area will be restored in accordance with the provisions set forth in the Upper ½-Mile Reach Removal Action Work Plan (BBL, August 1999).

In the event that such an observation/recovery well is installed, GE will initially monitor the well for the presence of NAPL on a weekly basis. If NAPL is observed at a thickness of 0.5 feet or greater, it will be manually removed. Following 6 weeks of monitoring, the results will be evaluated and GE will propose a schedule for additional monitoring and/or recovery to the EPA for approval.

Please call with any questions or comments.

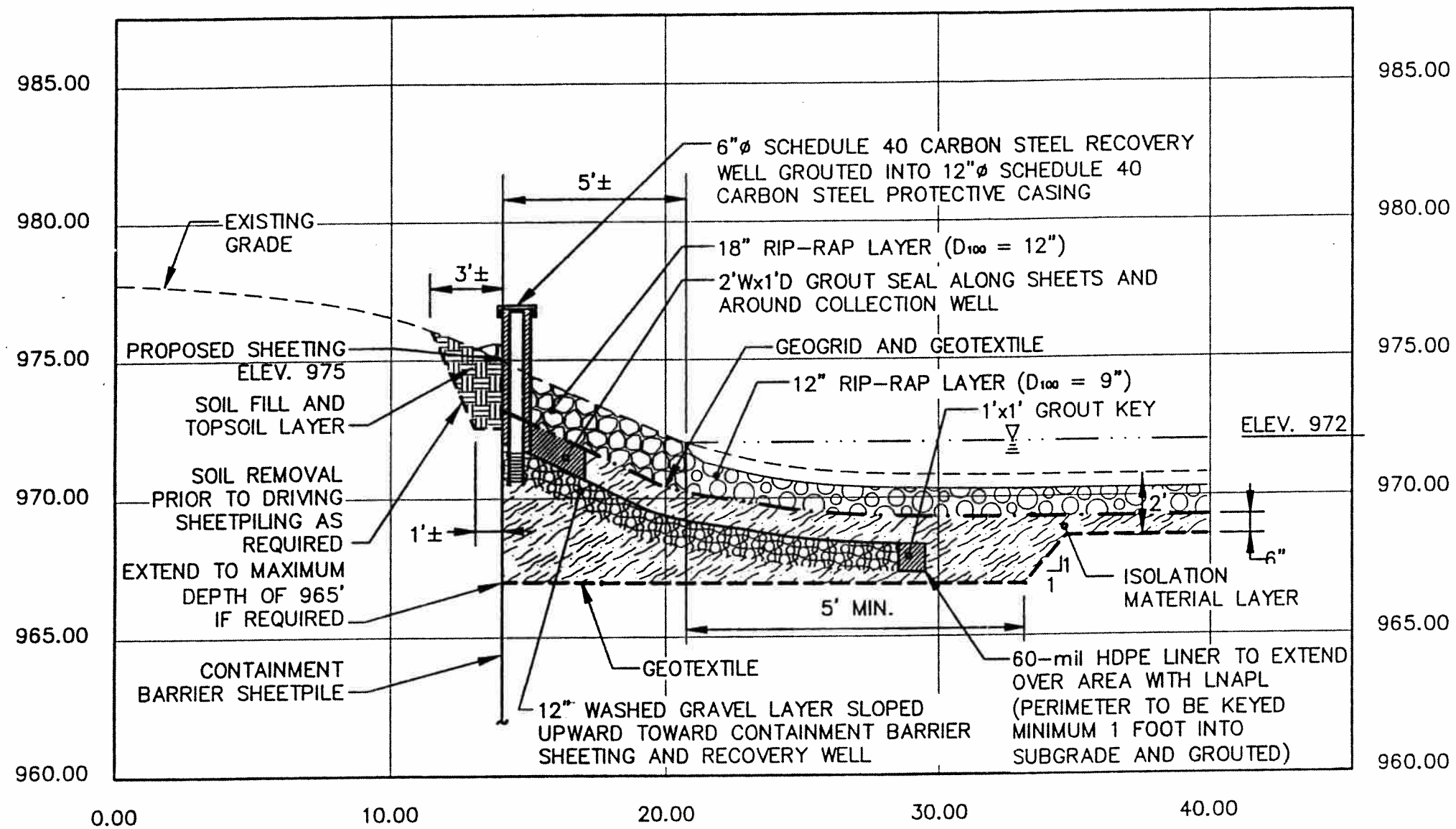
Very truly yours,



Andrew T. Silber
GE Project Coordinator

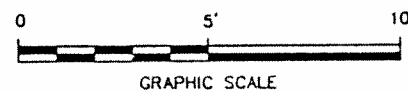
Enclosure

cc: M. Barash, DOI
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Public Information Repositories
GE Internal Repositories



SECTION C-C'

SCALE: HORIZ. 1"=5'
VERT. 1"=5'



GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS REMOVAL ACTION UPPER 1/2-MILE REACH OF HOUSATONIC RIVER	
MODIFIED RESTORATION CROSS-SECTION C-C' (NAPL CONTINGENCY)	
BBL	BLASLAND, BOUCK & LEE, INC. <i>engineers & scientists</i>
FIGURE 1	

X: NONE
L: ON=*, OFF=REF
P: BL
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