

08-0003

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

December 1, 2000

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

RECEIVED
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BY:

RE: Conditional Approval to Install Intermediate Cut-Off in Cell G2
Upper ½ -Mile Reach Removal Action
GE-Pittsfield/Housatonic River Site

Dear Mr. Silfer:

On November 17, 2000, GE submitted a document entitled *GE-Pittsfield/Housatonic River Site, Upper ½-Mile Reach Removal Action (GEC800), Results of Cell G2 NAPL Investigation and Proposal to Address Presence of LNAPL in Cell G2* ("GE's Submittal"). EPA is currently reviewing this submittal its entirety. However, pursuant to this submittal and verbal requests from GE, EPA has expedited our evaluation of GE's proposal to install an intermediate cut-off well in Cell G2 and restore the upstream section of Cell G2. Approval of the cut-off wall would allow GE to perform certain tasks in the upstream end of Cell G2 while the remainder of the submittal is reviewed.

On November 22, 2000, representatives of EPA and GE had a teleconference to discuss GE's submittal. On that call, EPA stated the likely source of the LNAPL was Former Oxbow H and that GE should provide a revised figure showing the spatial relation between Former Oxbow H and the proposed permanent sheetpile wall. On November 29, 2000, GE resubmitted this Figure indicating that Former Oxbow H is contained within the limits of the proposed permanent sheetpile. Concurrently, EPA's contractor performed the same task and generated a figure indicating that the Former Oxbow may extend slightly upstream of the proposed permanent sheetpile. The difference between the two figures is reasonable given the inherent inaccuracies in overlaying historical maps and areal photos over existing maps.

Therefore, pursuant to the Upper ½-Mile Reach Removal Action Work Plan and pursuant to Paragraph 73(b) of the Consent Decree, EPA approves the above-referenced submittal subject to the following conditions:

1. GE shall extend the proposed permanent sheetpile wall 10 feet upstream to ensure that the

upstream boundary of Former Oxbow H is within the limits of the proposed permanent sheetpile wall.

2. GE shall relocate the proposed intermediate cut-off wall 10 feet upstream of the proposed location to maintain the twenty-foot spacing between the intermediate cut-off wall and the proposed permanent sheetpile wall.

3. EPA reserves the right to require several additional perimeter compliance wells (for both NAPL and GW-3 performance standards) in this area. These wells may need to be screened at different depths to monitor for contamination in different sections of the groundwater since both LNAPL and DNAPL have been identified in this area. Also, since PCBs, volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs) have been detected in NAPLs in this area, the analytical requirements for the above-mentioned perimeter compliance wells will likely include, at a minimum, PCBs, VOCs and SVOCs. EPA may require these wells be installed as part of the conditional approval for GE's submittal referenced above or as part of EPA's conditional approval of GE's Plant Site 1 Groundwater Management Area 1 submittal.

4. EPA reserves the right to require future long-term monitoring of VOCs and SVOCs in sediments and/or surface water in the area near the LNAPL seeps.

Furthermore, as you know, Section 4.2 -- Non-Aqueous Phase Liquid Standards of Technical Attachment H of Appendix E to the Consent Decree contains performance standards that prohibit the following in areas where there is no physical containment barrier:

- The discharge of NAPL to surface waters and/or sediments, including the presence of bank seeps or sheens on the surface water,
- The presence of measurable NAPL (i.e., detectable with an oil/water interface probe) in wells near the bank.

Therefore, if there are violations of these performance standards in the future, GE is subject to corrective action requirements.

As indicated above, EPA's conditional approval of installation of the interim cut-off wall does not preclude EPA from requiring additional investigations and response activities pursuant to the Consent Decree and/or the *Statement of Work for Removal Actions Outside the River* (Appendix E to the Consent Decree) in the future.

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

Sincerely,



Dean Tagliaferro

On-Scene Coordinator

cc: Bill Horne, GE
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