

United States Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
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January 12, 2001

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

RE: Conditional Approval of GE's Cell G2 NAPL Submittals
Upper ½-Mile Reach Removal Action
General Electric-Housatonic River Site, Pittsfield, Massachusetts

Dear Mr. Silfer:

GE has submitted the following documents regarding the Non-Aqueous Phase Liquids (NAPLs) uncovered at Cell G2 of the Upper ½-Mile Reach Removal Action:

- *GE-Pittsfield/Housatonic River Site; Upper ½-Mile Reach Removal Action (GECD800); Results of Cell G2 NAPL Investigation and Proposal to Address the Presence of LNAPL in Cell G2 (November 17, 2000).*
- *GE-Pittsfield/Housatonic River Site; Upper ½-Mile Reach Removal Action (GECD800); Revised Figure 5 for Cell G2 NAPL Investigation Proposal (November 27, 2000).*
- Short-term structural analysis of the proposed Waterloo sheetpile wall, By Maxymillian Technologies, Inc (dated 12/5/00; provided to EPA by GE on 12/6/00).
- *GE-Pittsfield/Housatonic River Site; Upper ½-Mile Reach Removal Action (GECD800); Contingency Plan for NAPL remaining in Cell G2 (December 19, 2000).*

The above-referenced documents submitted by GE are subject to the terms and conditions specified in the Consent Decree that was entered in District Court on October 27, 2000 (the "Consent Decree"). In response to requests from GE, EPA agreed to expedite our review of individual components of the above-mentioned submittals to allow GE to implement such components while EPA reviewed the submittal in its entirety. As such, EPA has issued the following interim conditional approval letters regarding the NAPL at Cell G2.

- *Conditional Approval to Install Intermediate Cut-off Wall in Cell G2 (December 1, 2000).*

Interim Conditional Approval of GE's Cell G2 NAPL Submittals (the Conditional Approval letter did not address GE's groundwater modeling, monitoring and potential for groundwater recovery components) December 11, 2000.

Conditional Approval of GE's Contingency Plan for NAPL remaining in Cell G2 (December 26, 2000)

EPA has now completed its review of the remaining portions of the Cell G2 NAPL submittals. Pursuant to the Upper ½-Mile Reach Removal Action Work Plan and Paragraph 73(b) of the Consent Decree, EPA, after consulting with the Massachusetts DEP, approves the above-referenced submittal subject to the following conditions:

1. GE shall notify EPA within 24 hours if NAPL is detected in either of the two proposed perimeter wells.
2. GE and EPA will agree on the actual location of the proposed monitoring wells prior to installation.
3. GE shall collect groundwater elevation measurements at all three proposed wells in addition to monitoring for NAPL on a weekly basis. In addition, GE shall collect NAPL and groundwater elevation measurements from existing wells numbered ES2-2, ES2-2A, and ES2-7.
4. GE shall collect NAPL/groundwater elevation measurements at all wells identified in item three during high flow events. For the purposes of this monitoring requirement, high flow events shall be defined as peak river flows in excess of 1,000 cubic feet per second as measured at the Coltsville, Massachusetts USGS gauging station.
5. The two wells proposed to be located outside the containment barrier shall be considered NAPL compliance wells as described in Technical Attachment H of Appendix E to the Consent Decree ("Technical Attachment H"). Therefore, the applicable performance standard for these two wells is:

"For areas adjacent to physical containment barriers, prevention of any measurable LNAPL migration around the ends of the physical containment barriers"(Section 4.2, bullet 3 of Technical Attachment H).

In addition, the following performance standard is applicable to the riverbank and surface water adjacent to Cell G2:

"Containment, defined as no discharge of NAPL to surface waters and/or sediments, which shall include no sheens on surface water and no bank seeps of NAPL" (Section 4.2, bullet 1 of Technical Attachment H).

6. EPA reserves the right to add any additional monitoring wells it deems necessary as perimeter compliance wells (for NAPL and/or GW-3 performance standards pursuant to Technical Attachment H) in this area. 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 may include, but are not limited to, PCBs, VOCs and SVOCs.

Schedule

1. GE shall install the eastern (upstream) and center monitoring wells within two weeks of the removal of the sheetpile associated with Cell G2. GE shall install the western (downstream) monitoring well within two weeks of the removal of the sheetpile associated with Cell G3. GE shall provide EPA notice three business days prior to installing any well.
2. GE shall conduct weekly groundwater elevation measurements/NAPL monitoring at the eastern (upstream) and center monitoring wells, and wells ES2-2, ES2-2A, and ES2-7 following installation and development of the eastern (upstream) and center monitoring wells. GE shall conduct weekly groundwater elevation measurements/NAPL monitoring at the western (downstream) following installation and development of this well. The initial monitoring period for these wells shall begin with the monitoring of the eastern (upstream) and center monitoring wells, and wells ES2-2, ES2-2A, and ES2-7 and continue until four weeks of monitoring is completed for the western (downstream) monitoring well. Following the initial monitoring period, GE shall conduct monthly groundwater elevation monitoring/NAPL measurements of these six wells until GE proposes, and EPA approves, an alternate monitoring program.
3. Within two weeks of the completion of the initial monitoring period discussed above, GE shall submit a report evaluating the monitoring data. This report shall include:
 - A local groundwater elevation map using actual field measurements for the six wells referenced above;
 - A comparison of the field monitoring data to groundwater elevations calculated by the model included as Attachment C to the November 17, 2000 submittal;
 - An evaluation of, and if appropriate a proposal for, additional investigative, monitoring or response actions (including additional groundwater controls) in this area.

EPA's conditional approval of this submittal 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. Furthermore, this conditional approval letter does not modify any of the performance standards contained in the Upper ½-Mile Reach Removal Action Work Plan, the Consent Decree and/or the *Statement of Work for Removal Actions Outside the River* (Appendix E to the Consent Decree).

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

Sincerely,

Dean Tagliaferro

cc: Tim Conway, EPA
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Site File