

08-0094
SDMS: 160536

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

March 11, 2002

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

RE: Final Conditional Approval of GE's submittal entitled *Results of Cell J1 DNAPL Investigation and Proposal to Address Presence of DNAPL in Cell J1*
Upper ½-Mile Reach Removal Action
General Electric-Housatonic River Site, Pittsfield, Massachusetts

Dear Mr. Silfer:

On November 28, 2001, GE submitted a document entitled *Results of Cell J1 DNAPL Investigation and Proposal to Address Presence of DNAPL in Cell J1*. On December 17, 2001, EPA issued a response that conditionally approved the installation of the sheetpile component of GE's proposal. The proposed excavation and monitoring activities were not approved by the December 17, 2001 letter. Rather, the EPA response letter directed GE to perform additional investigative activities and to resubmit the results of the activities, and, if appropriate, propose modifications to the proposed excavation plan. On January 2, 2002, in response to EPA's December 17, 2001 letter, GE submitted a revised Figure 2. This Figure identifies the estimated elevation of the apparent confining layer as determined by additional in-river borings. On January 7, 2002, EPA issued GE an interim conditional approval letter for the proposed excavation and restoration components of the above-referenced submittal.

The purpose of this letter is to address the status of the remaining elements of the above-referenced submittal—specifically, the monitoring component. 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, is conditionally approving the monitoring component of the above-referenced submittal subject to the conditions outlined below.

1. GE shall relocate the center monitoring well to a location approximately 25 feet upstream of the downstream wing wall of the Waterloo sheetpile.

2. GE shall advance the boring at each well location down to the till layer, which is present at approximately 950 feet above mean sea level. At each boring, GE shall collect continuous soil samples. After reaching the till layer, GE, in consultation with EPA, will determine the appropriate depth to install the monitoring well in order to maximize the potential for the detection of NAPL.
3. GE shall ensure that a range of appropriate well screen slot sizes and filter pack material sizes are available prior to installing the monitoring wells to ensure that the well construction is performed in compliance with Appendix T of GE's Sampling and Analysis Plan.
4. GE shall not install the proposed monitoring wells until EPA and GE agree in the field with actual locations.
5. GE shall add the monitoring well on the river side of the Waterloo sheetpile to the monitoring program proposed by GE. GE shall include the well schematic for this well in the subsequent submittal. Until an alternate recovery protocol is approved by EPA, GE shall notify EPA within 24 hours if any NAPL is detected in this monitoring well and GE shall remove any recoverable NAPL, regardless of NAPL thickness, from this well.
6. GE shall notify EPA within 24 hours if NAPL is detected in either of the two proposed perimeter wells.
7. 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"). The applicable Performance Standards for these two wells are bullets 2 and 3 in Section 4.2 of Technical Attachment H.
8. GE shall collect groundwater elevation measurements in addition to NAPL measurements at the proposed wells. Following the initial four week monitoring period, GE shall conduct monthly groundwater elevation monitoring/NAPL measurements of proposed wells until GE proposes, and EPA approves, an alternate monitoring program.
9. Within two weeks of the completion of the initial four week monitoring period, GE shall submit a report evaluating the monitoring data. This report shall include:
 - A local groundwater elevation map using actual field measurements for the wells;
 - A comparison of the field monitoring data to groundwater elevations calculated by the model included as Attachment C; and,
 - An evaluation of, and if appropriate, a proposal for additional investigative, monitoring or response actions (including additional groundwater controls) in this area.

10. GE shall collect groundwater elevation measurements during at least one high flow event, using water level data loggers, in the vicinity of one of the permanent sheetpile walls installed in the Upper ½-Mile Reach. By March 20, 2002, GE shall submit to EPA for approval a brief plan that outlines the objective, subject sheetpile wall location, existing wells and proposed wells/piezometers (if any) to be monitored, the monitoring procedures and a deliverable due date. The monitoring program shall be in place and operational no later than April 10, 2002 in order to conduct monitoring during the historical high flow period.
11. 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 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 GW-3 perimeter compliance wells may include, without limitation, VOCs and SVOCs.
12. 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 NAPL seeps.
13. Conditions and approvals cited in this letter for actions involving NAPL/groundwater monitoring, assessments, reporting and response actions are subject to further review and potential modification by EPA during the implementation of Technical Attachment H to Appendix E of the Consent Decree.

The above-listed requirements are the minimum requirements that GE shall meet. However, this conditional approval letter does not waive or modify any of the Performance Standards specified in the Upper ½-Mile Reach Removal Action Work Plan or the Consent Decree, or any requirements associated with such Performance Standards. As you know, Section 4.2 -- Non-Aqueous Phase Liquid Standards of Technical Attachment H of Appendix E to the Consent Decree includes, among other things, the following Performance Standards:


- "Containment, defined as no discharge of NAPL to surface water and/or sediments, which shall include no sheens on surface water and no bank seeps of NAPL."
- "For areas near surface waters in which there is no physical containment barrier between the wells and the surface water, elimination of measurable NAPL (i.e., detectable with an oil/water interface probe) in wells near the surface water bank that could potentially discharge NAPL into the surface water, in order to prevent such discharge and assist in achieving groundwater quality Performance Standards."
- "For areas adjacent to physical contamination barriers, prevention of any measurable LNAPL migration around the ends of the physical containment barriers."

Furthermore, EPA's conditional approval of this submittal does not preclude EPA from requiring additional investigations and response activities pursuant to the Consent Decree, the Upper ½-

Mile Reach Removal Action Work Plan 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

cc: Tim Conway, EPA
Bryan Olson, EPA
Mike Nalipinski, EPA
Holly Inglis, EPA
J. Lyn Cutler, DEP
Sue Steenstrup, DEP
Mark Gravelding, BBL
Dawn Jamros, Weston
Site File