

United States Environmental Protection Agency
Region 1
Office of Site Remediation and Restoration
One Congress Street, Boston, Massachusetts 02114-2023

Date: July 21, 2008
Subject: Pollution Report (POLREP) 2 and Final
Site: Former Oxbow Areas J & K Removal Action Area (RAA),
GE-Pittsfield/Housatonic River Site, Pittsfield,
Massachusetts
From: Richard Hull, GE Facility RPM - EPA New England
To: See Attached List
Response Authority: CERCLA Removal Action
Pollutant: Polychlorinated Biphenyls (PCBs)
Site ID No.: 0167
Phone Number: (617) 918-1882
Mobilization Date: February 10, 2003
Demobilization Date: August 3, 2006
Completion Date: June 3, 2008
Last POLREP: February 25, 2003

I. Background:

On October 27, 2000, a Consent Decree (the "CD") executed by the General Electric Company ("GE"), the United States Environmental Protection Agency, the Massachusetts Department of Environmental Protection ("MDEP"), and several other government agencies was entered in the United States District Court for the District of Massachusetts. The Consent Decree requires (among other things) the performance of response actions to address polychlorinated biphenyls (PCBs) and other hazardous constituents in soils, sediment, and groundwater in several areas at and near Pittsfield, Massachusetts that collectively comprise the GE-Pittsfield/Housatonic River Site.

The CD requires GE to investigate and, where necessary, perform response actions to address soil contamination at the 20 Removal Action Areas (RAAs) at the GE-Pittsfield/Housatonic River Site. All activities completed by GE at the Former Oxbow Areas J & K RAA were performed pursuant to a statement of work (SOW), which is Appendix E to the CD.

Former Oxbow Areas J & K RAA is an approximate 8.5 acre site located adjacent to the Housatonic River approximately 2,500 feet upstream from the Newell Street Bridge, in Pittsfield, Massachusetts. The Oxbow J component of the RAA is approximately 6 acres and is generally located north of the Housatonic River, south of East Street, and between Fasce Street and Commercial Street. The Oxbow K component of the RAA is approximately 2.5 acres and is generally located south of the Housatonic River, across from the eastern portion of Former Oxbow Area J, and generally to the northeast of Ventura Avenue.

This area originally consisted of land adjoining several oxbows or low-lying areas of the Housatonic River. Rechannelization and straightening of the Housatonic River in the early 1940s separated these oxbows and low-lying areas from the active course of the river. The oxbows and low-lying areas were subsequently filled with various material and by a variety of sources (including GE), resulting in the surface elevations and topography evident today.

Former Oxbow J is comprised of six commercial/industrial properties, as well as several utility-related easements and City-owned easements/rights-of-way. Although primarily industrial and commercial in nature, certain small and discontinuous areas within Former Oxbow J are designated in the CD and SOW as recreational. The Work Plan evaluated these Former Oxbow J areas as follows:

Parcel K10-11-1	Commercial/Recreational
Parcel K10-11-2	Commercial/Recreational
Parcel K10-11-3	Commercial/Recreational
Parcel K10-11-5	Commercial
Parcel K10-12-1	Commercial/Recreational
Parcel K10-13-1	Commercial/Recreational

Former Oxbow K is comprised of five residential and recreational parcels. The Work Plan evaluated these Former Oxbow K areas as follows:

Parcel K10-10-3	Recreational
Parcel K10-10-4	Recreational
Parcel K10-10-5	Residential
Parcel K10-10-6	Residential
Parcel K10-10-33*	Recreational

*only a portion of this parcel is included in the RAA.

In the former Oxbows J & K RAA both the riverbank and nonriverbank portions of the properties are included in this RAA.

Groundwater within the Former Oxbow Areas J&K RAA is being addressed under Groundwater Management Area # 2 pursuant to the CD and SOW and is not part of this pollution report.

In June 2002, GE submitted a pre-design investigation work plan that required the collection of soil samples at a frequency dictated by Appendix E of the CD. GE submitted an addendum to the work plan in January 2003, which was conditionally approved by EPA on January 13, 2003. Pursuant to these plans, starting in February 2003, GE collected and analyzed soil samples for total PCBs and non-PCB contaminants consisting of the contaminants listed in Appendix IX of

40 CFR Part 264 plus the following three additional contaminants: benzidene, chloroethylvinyl ether, and 1,2-diphenylhydrazine.

For additional details, see Former Oxbow Areas J & K RAA POLREP 1 dated February 25, 2003. Additional documents are available on the GE-Pittsfield/Housatonic River Site website (www.epa.gov/region1/ge).

II. Actions Since the last POLREP:

In July 2003, GE submitted a pre-design investigation report, which was conditionally approved by EPA on September 29, 2003. Subsequently, GE submitted a supplemental pre-design investigation report in June 2004, and an additional supplemental pre-design investigation report in November 2004, both of which were conditionally approved by EPA on August 26, 2004, and January 10, 2005, respectively. Based on the soil-related Performance Standards contained in the CD and SOW and the analytical data from the sampling events, GE conducted technical removal design/removal action (RD/RA) evaluations using spatial averaging protocols specified in the Consent Decree for both PCBs and Appendix IX constituents. These evaluations concluded that existing soil conditions did not satisfy the applicable soil-related Performance Standards at all parcels, and, therefore, response actions, including soil removal, were necessary to achieve these Performance Standards at some parcels as described below.

GE presented the results of the evaluations associated with the pre-design investigation in a conceptual removal design/removal action work plan submitted in March 2005. Following EPA's conditional approval of the conceptual RD/RA on June 14, 2005, GE submitted a final RD/RA in September 2005, which was also conditionally approved by EPA on February 23, 2006.

In April 2006, GE submitted an addendum to the final RD/RA which presented the results of additional sampling conducted at a number of parcels that GE determined could potentially achieve the Performance Standards that apply to residential properties. Five of six non-residential properties that were subject to additional sampling meet residential Performance Standards. GE evaluated the sixth property as commercial/recreational. EPA conditionally approved the addendum on June 23, 2006

For properties not meeting residential standards, the Consent Decree requires either an Environmental Restriction and Easement (ERE) or a "Conditional Solution" be implemented on each such property. EREs are deeded environmental land use restrictions that prohibit certain uses. Conditional Solutions apply where a private property owner refuses an ERE. Conditional Solutions place obligations on GE to perform response actions to allow legally permissible future uses (changing from commercial to residential use, for example). The properties not meeting

residential performance standards all have Conditional Solutions, so there are no EREs for the properties in this RAA.

The soil-related Performance Standards for PCBs at given depth intervals are as follows:

Commercial/industrial properties (with Conditional Solutions):

0-1 feet 25 ppm; 0-3 feet 25 ppm; 1-6 feet 200 ppm; and 0-15 feet 100 ppm

Recreational properties (with Conditional Solutions):

0-1 feet 10 ppm; 0-3 feet 10 ppm; and 0-15 feet 100 ppm

Residential properties

0-1 feet 2 ppm; 1-X feet 2 ppm, where X is defined as the maximum depth at which PCBs were detected (up to a maximum depth of 15 feet)

The soil-related Performance Standards for non-PCB contaminants are described in the SOW and in GE's Final Completion Report.

Following the investigations that were conducted at each of the 11 parcels in the RAA, soil was removed and restoration work was conducted at parcels such that the applicable Performance Standard for each parcel was met. The soil removal and restoration activities were primarily conducted between July and November 2006. An air monitoring program was conducted during the removal phase of the construction process. Additional restoration activities were conducted subsequent to November 2006 and prior to submission of the Final Completion Report.

Following is a list of the parcels in the RAA with the applicable use designation, along with a description of the remediation work conducted on the parcel:

Parcel K10-11-1: Commercial/Recreational with Conditional Solution. Remediation included soil removal and restoration.

Parcel K10-11-2: Commercial/Recreational with Conditional Solution. Remediation included soil removal and restoration, including tree and shrub replanting.

Parcel K10-11-3: Commercial/Recreational with Conditional Solution. Remediation included soil removal and restoration.

Parcel K10-11-5: Commercial. Additional evaluation, soil removal, and restoration, including tree and shrub replanting and riverbank stabilization, were conducted such that the parcel meets residential standards. Therefore, an ERE or Conditional Solution is not necessary.

Parcel K10-12-1: Commercial. Additional evaluation, soil removal, and restoration, including tree and shrub replanting, were conducted such that the parcel meets residential standards. Therefore, an ERE or Conditional Solution is not necessary.

Parcel K10-13-1: Commercial/Recreational with Conditional Solution. Remediation included soil removal and restoration.

Parcel K10-10-3: Recreational. Additional sampling and evaluation was performed, and the property meets residential standards without the need for remediation. Therefore, an ERE or Conditional Solution is not necessary.

Parcel K10-10-4: Recreational. Additional sampling and evaluation was performed, and the property meets residential standards without the need for remediation. Therefore, an ERE or Conditional Solution is not necessary.

Parcel K10-10-5: Residential. No remediation was required.

Parcel K10-10-6: Residential. Remediation included soil removal and restoration, including tree and shrub replanting.

Parcel K10-10-33: Recreational. Additional sampling and evaluation was performed, and the property meets residential standards without the need for remediation. Therefore, an ERE or Conditional Solution is not necessary.

By cover letter dated May 13, 2008, GE submitted a Final Completion Report for the Former Oxbow Areas J & K RAA and certified that all actions required by the Consent Decree (excluding Post-Removal Site Control Activities) were completed and that the soil-related Performance Standards were attained. On May 21, 2008, Massachusetts DEP sent a letter to EPA concurring that GE completed all actions required by the Consent Decree (excluding Post-Removal Site Control Activities). On June 3, 2008, EPA issued GE a Certificate of Completion for the Former Oxbows J & K RAA and transmitted the Certificate of Completion to GE along with an approval letter for GE's Final Completion Report.

III. Disposition of Waste

Under the Consent Decree, GE may dispose of non-RCRA hazardous waste with average PCB concentrations less than 50 ppm into the Hill 78 On-Plant Consolidation Area ("OPCA"). Material with average concentrations greater than 50 ppm PCBs and/or RCRA hazardous waste was authorized may be disposed at the Building 71 OPCA. Free liquids, free product, intact

drums and capacitors, asbestos-containing material, and other equipment that contains liquid PCBs within its internal components, must be disposed of appropriately off-site.

The total quantity of soil removed from the RAA was approximately 1,955 cubic yards. Of the total, 1,290 cubic yards were disposed at the Building 71 OPCA and 665 cubic yards were disposed at the Hill 78 OPCA.

For additional details, see Final Completion Report for Former Oxbow Areas J & K Removal Action, May 2008, available at the GE-Housatonic River Site website (www.epa.gov/region1/ge).

IV. Financial:

Not applicable. PRP-lead removal action.

V. Future Activities

- Monitor GE's post-removal site control activities. GE will be conducting post-removal site control activities according to an approved plan contained in GE's Final Completion Report.
- Monitor GE's groundwater management and/or non-aqueous phased liquids (NAPL) recovery activities. This activity will be conducted under a separate removal action associated with Groundwater Management Area # 2.

POLREP DISTRIBUTION LIST

Date and Polrep #: July 21, 2008 POLREP #2 & Final

Project: Former Oxbows J & K Removal Action Area (GE/Housatonic Site)

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