

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

Date: August 27, 2008
Subject: Pollution Report (POLREP) 2 and Final
Site: Newell Street Area I Removal Action Area (RAA), GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts
From: Rich Fisher, 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) 918-1721
Mobilization Date: January 24, 2001
Demobilization Date: November 9, 2007
Completion Date: August 27, 2008
Last POLREP: February 20, 2001

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 (DEP), 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) within the GE-Pittsfield/Housatonic River Site. All activities completed by GE at the Newell Street Area I RAA were performed pursuant to a statement of work (SOW), which is Appendix E to the CD.

The Newell Street Area I RAA is an approximately 11-acre site located in Pittsfield, Massachusetts that is generally bounded to the north by the Housatonic River, to the south by Newell Street, to the west by the Ontario Street Extension and the Newell Street Area II RAA, and to the east by the Lakewood (Hibbard) Playground. The Newell Street Area I RAA is considered one of the Former Oxbow Areas under the CD and consists of thirteen parcels. Only the non-riverbank portion of these parcels is included in this RAA. The riverbank portions of these parcels are part of the Upper ½-Mile Reach Removal Action.

This area originally consisted of land adjoining two 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.

Groundwater within the Newell Street Area I RAA is being addressed under Groundwater Management Area # 1 pursuant to the CD and SOW and is not part of this pollution report.

In March 2000, 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. This work plan, conditionally approved by EPA on November 16, 2000, was variously revised and supplemented through June 2001. Pursuant to this plan, starting in February 2001, 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 initial Newell Street Area I POLREP dated February 20, 2001 or the GE-Pittsfield/Housatonic River Site website (www.epa.gov/region1/ge).

II. Actions Since the last POLREP:

GE submitted sample results in pre-design investigation reports dated April 9, June 19, June 29, and August 1, 2001. 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 and engineered barrier installations, were necessary to achieve these Performance Standards at some parcels as described below.

GE proposed response actions to meet the soil-related Performance Standards in Removal Design/Removal Action Work Plans and supplements dated from April 2003 to June 2004. These Performance Standards are based upon the existing use of a property: that is, commercial, recreational, or residential. None of the parcels in this RAA are in residential use.

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

Commercial/industrial properties (with EREs):

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

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 EREs):

0-1 feet 10 ppm; 1-3 feet 15 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 13 parcels in the RAA, soil was removed, engineered barriers (1-ft minimum thickness) were installed, and restoration work was conducted at parcels such that the applicable Performance Standard for each parcel was met. An air monitoring program was conducted during the removal phase of the construction process. The construction activities were generally performed between September 2003 and June 2006. Minor remediation activities were also performed on one parcel from November 7 to November 9, 2007.

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 following the investigation.

- J9-23-12: Recreational with ERE. Non-riverbank portion behind parcels J9-23-16 through J9-23-25. This parcel is identified as "GE-owned riparian strip" in the Final Completion Report. Remediation included soil removal.
- J9-23-13: Commercial with a Conditional Solution. Remediation included soil removal and engineered barrier installation.

- J9-23-16: Commercial with ERE. Remediation included soil removal and engineered barrier installation.
- J9-23-17: Recreational with a Conditional Solution. Remediation included soil removal and engineered barrier installation.
- J9-23-18: Commercial with a Conditional Solution. Remediation included soil removal and engineered barrier installation.
- J9-23-19: Commercial with a Conditional Solution. Remediation included soil removal and engineered barrier installation.
- J9-23-20: Commercial with a Conditional Solution. Remediation included soil removal and engineered barrier installation.
- J9-23-21: Commercial with a Conditional Solution. Remediation included soil removal.
- J9-23-22: Commercial with a Conditional Solution. Remediation included soil removal and engineered barrier installation.
- J9-23-23: Commercial with ERE. Remediation included soil removal and engineered barrier installation.
- J9-23-24: Commercial with ERE. Remediation included soil removal.
- J9-23-25: Commercial with a Conditional Solution. No active remediation was required to meet Performance Standards.
- J9-23-26: Recreational with ERE. Northwest portion of Lakewood (Hibbard) Playground only. No active remediation was required to meet Performance Standards.

By cover letter dated July 31, 2008, GE submitted a Final Completion Report for the Newell Street Area I 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. By letter dated August 21, 2008 to EPA, Massachusetts DEP concurred that GE had completed all actions required by the Consent Decree (excluding Post-Removal Site Control Activities). On August 27, 2008, EPA issued GE a Certificate of Completion for the Newell I 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 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 14,810 cubic yards, all of which was disposed at the Building 71 and Hill 78 OPCAs. The volume of soil disposed of at the Building

71 OPCA was approximately 13,960 cubic yards and the volume of soil disposed at the Hill 78 OPCA was approximately 850 cubic yards. The total area encompassed by the engineered barriers at the RAA is approximately 67,000 sq. ft.

One building was demolished on parcel J9-23-16 and two buildings were demolished on parcel J9-23-23. The building demolition debris (except for items prohibited from disposal at the OPCAs under the CD and SOW) was disposed of at the Building 71 OPCA. Buried drums and capacitors that were discovered intact during the construction activities were placed into eighteen drum overpacks and temporarily stored in GE's on-plant hazardous waste storage facility (Building 78) for characterization and subsequent shipment to Waste Management facilities in Model City, NY or Port Arthur, TX for incineration/disposal.

For additional details, see Newell Street Area I Final Completion Report, July 2008 available at the GE-Pittsfield/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 #1.

POLREP DISTRIBUTION LIST

Date and Polrep #: 08/27/08, POLREP #2

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