



Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Department of Environmental Protection
Western Regional Office

OCT 11 1995

ENVIRONMENTAL PROGRAMS

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Lt. Governor

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October 6, 1995

Superfund Records Center

SITE: GE HOUSATONIC

BREAK: 11.9

OTHER: _____

Mr. Jeffrey Ruebesam
General Electric Company
Area Environmental and Facility Operations
100 Woodlawn Avenue
Pittsfield, Massachusetts 01201

Re: Pittsfield 1-0148; RTN# 1-10380;
GE/Unkamet Brook;
Conditional Approval of Immediate
Response Action (IRA) Plan

Dear Mr. Ruebesam:

The Department of Environmental Protection (the Department) received, on September 6, 1995, an Immediate Response Action (IRA) Plan dated August 31, 1995 for the excavation and removal of drums buried in a fill area of the subject site, located south of Merrill Road west and adjacent to the west entrance to the GE Building OP-3 parking lot.

Background Information

On June 10, 1994, GE first encountered drums buried in this fill area during installation of a steam line between the Altresco cogeneration plant and Building OP-3 and notified the Department. Installation of this steam line was being completed in accordance with the Department approved GE Excavation Protocols. Upon discovery of the buried drums, GE completed a Department approved IRA to remove nineteen drums found within the steam line excavation. By October 17, 1994, GE completed this IRA and submitted an IRA Completion Statement along with results for sampling. Drums, and soil surrounding the drums, were disposed of as hazardous waste. Samples collected from the base of the drum excavation were analyzed for Toxicity Characteristic Leaching Procedure (TCLP) volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, and total polychlorinated biphenyls (PCBs). Results indicated that no TCLP compounds were detected and no PCBs were detected. Results for the samples collected from the drum contents indicated that some drums contained solids or liquids contaminated primarily with VOCs and PCBs.

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During November 1994, GE conducted a ground penetrating radar (GPR) survey to determine if any drums remain in this area. GE states that the GPR survey results indicate that additional drums may be buried in this area. The results of this survey are summarized in Figures 2B and 2C of the August 31, 1995 IRA Plan. GE's Phase II Scope of Work/RCRA Facility Investigation (RFI) Proposal included plans for removal of remaining drums in this area as part of the Phase II/RFI Investigation. The Department and the USEPA have joint jurisdiction over response actions completed at the subject site. In accordance with the review letter dated August 17, 1995 for the Phase II Scope of Work/RFI Proposal, the excavation and removal of buried drums is not considered assessment work and should be completed as an IRA. As such, GE submitted an IRA Plan for the removal of the remainder of the drums in this area.

Summary of IRA Plan

As proposed in the IRA Plan, GE will first collect subsurface soil samples in order to characterize the top 4 to 6-foot layer of soil within the suspected buried drum area. The IRA Plan states that GE suspects the top few feet of the soil to be "clean". Soil samples will be collected at two foot intervals to a depth of 4 feet at the two borings proposed for the northwestern half of the area, and to a depth of 6 feet at the two borings proposed for the southeastern half of the area. Samples will be analyzed for PCBs and screened for VOCs in accordance with GE's Sampling and Analysis Plan/Data Collection and Analysis Quality Assurance Plan (SAP/DCAQAP), dated May 1994. Samples exhibiting VOC screening results greater than 10 units on a photoionization detector (PID) will be analyzed for VOCs, using EPA Method 8240. According to the IRA Plan, the top increments of soil will be separated and designated for use as backfill "assuming favorable results".

After installation of the borings, GE will excavate a five-foot square hole at each of the "target locations" (potential locations of buried drums as determined by the ground penetrating radar survey) down to the depth of the target location (Shown in Figure 2C of the IRA Plan). In areas where several target locations exist, the excavation will be expanded to include the nearby locations. Soil below four to six feet will be separated and sampled for disposal. If drums are found in the excavations, soil surrounding the drums will be separated into another pile for sampling and disposal. Drums will be removed from the excavation and transferred to overpack barrels, stored in GE's hazardous waste storage facility, and sampled for disposal. Drum pieces will be transferred to plastic tote bins. Any visually contaminated soils will be stockpiled with soils removed from around the drums. If the groundwater table is reached during excavation of the target areas, excavation will be stopped and GE will remove all drums encountered to that depth. If groundwater has to be removed to

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allow for removal of visible drums, recovered groundwater will be pumped to a tanker for transport to GE's groundwater treatment plant located at the East Street Area II site in Building 64G. The IRA Plan states that "mitigating actions will include provisions for dust control, although it is unlikely to be required".

Three of the proposed target locations are located on Consolidated Railroad Corporation (Conrail) property. GE states that property access may not be obtained from Conrail in time for work to proceed prior to the ground freezing. In the event that access is not obtained from Conrail, GE plans to proceed excavating all but the three proposed target locations on Conrail property, so that work can be completed prior to the ground freezing.

The IRA Plan states that a protective barrier will be installed to enclose the work area. The Plan also states that the Pittsfield Police and Fire Departments will be briefed on the project at least seven days prior to the start of excavation.

In order to determine if groundwater contamination is present in this area, GE proposes installation and sampling of one piezometer and sampling of existing monitoring well MW-39. Groundwater samples will be analyzed for VOCs, SVOCs, metals, PCBs, and pesticides. Well MW-39 is located in the northwest portion of the fill/buried drum area near the location of the steam line jacking pit excavation where the drums were first found and removed during the June 1994 IRA. The proposed piezometer is located at the south end of the fill area, presumed downgradient of the fill area.

Departmental Determinations

In accordance with 310 CMR 40.0424 (2), the Department approves of the IRA Plan subject to the conditions listed below.

1. Pursuant to 310 CMR 40.0425, an IRA Status Report or IRA Completion Report is due 120 days from the date of this letter and no later than 60 days from the date of completion of the removal action (310 CMR 40.0427 (2)).
2. In addition to the statutory requirements as stated in 310 CMR 40.0427, the IRA Completion Report must include the following: a map to scale indicating horizontal and vertical locations of all drums and contaminated soil; a map to scale indicating the boundaries of the fill area; all manifests, bills of lading, etc. documenting disposal of all drums and soil; locations for and results for any soil, drum or groundwater samples.
3. A schedule for completion of the IRA was not provided in the IRA Plan. Pursuant to 310 CMR 40.0424(e), a proposed schedule must be included with the IRA Plan. Therefore, a completion

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schedule for the proposed IRA must be submitted to the Department within 20 days of the date of this letter and no later than 5 days prior to starting the IRA.

4. As proposed, the work area shall be adequately secured at all times to prevent public access to excavation pits, contaminated soil, equipment or drums.
5. All excavated soil must be placed on and covered with polyethylene sheeting.
6. As stated in the Department's and USEPA's August 17, 1995 letter, the IRA Plan should have included plans for sampling soil left in place. The sampling proposed in the IRA Plan is not sufficient to determine if contamination will be left in place. At a minimum, GE shall complete additional soil sampling as described below. The four proposed soil borings shall be installed to the maximum depth of excavation in each area (8 feet in the northwestern area and 10 feet in the southeastern area) and split spoon soil samples shall be collected every two feet and analyzed as proposed in the IRA Plan. Prior to backfilling any excavation where drums or visually contaminated soil are observed, soil samples shall be collected at the base of each excavation, screened for VOCs and analyzed for a minimum of the drum contents as determined by the drum sampling and PCBs. Any soil sample exhibiting a VOC screening result greater than 10 units shall be analyzed for VOCs using EPA Method 8240. Additionally, since the soil samples listed above are intended to provide an indication of any contamination left in place after drum and soil removal, only total, not TCLP analyses, shall be used for these soil samples.
7. Data from two groundwater sampling points are not sufficient to determine if the fill area has contaminated groundwater in this area. At least one additional piezometer or monitoring well must be installed at the southeastern end of the fill area. Groundwater samples must be collected from the two piezometers and monitoring well MW-39 and analyzed for the parameters as proposed in the IRA Plan (VOCs, SVOCs, metals listed in Appendix IX+3, PCBs and pesticides).
8. Soil excavated from all areas shall be handled and backfilled in accordance with the protocols established in the Department approved, GE Excavation Protocols and in accordance with the Toxic Substance Control Act (TSCA). The IRA Plan contains a discrepancy in stating that soil within the top 4 to 6 feet will be treated as backfill and soil surrounding drums will be stockpiled separately, as some of the target locations shown in Figure 2C are only one foot deep. In accordance with the

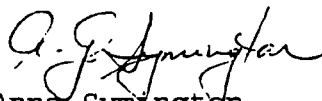
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GE Excavation protocols (as approved by the Department), soil that is visually contaminated, contains greater than 50 ppm PCBs, or is considered hazardous waste cannot be backfilled. Also in accordance with these protocols, soil backfilled within the top foot of the ground surface must contain less than 2 ppm PCBs, not exhibit readings greater than 10 units during VOC screening, and not be considered hazardous waste. Additionally, soil that qualifies for backfill use must be reused in the excavation or at the GE Facility property. Soil sampled for disposal and backfill purposes shall be sampled in accordance with the GE Excavation Protocols. Soil surrounding the drums shall not be used as backfill unless it meets the criteria listed in GE Excavation Protocols and it is sampled for a minimum of the drum contents, PCBs and VOCs using total, not TCLP, analyses.

9. GE shall conduct daily ambient air screening for VOCs during excavation activities at locations upwind (background) and downwind (outside of the exclusion or contaminated zone) using a PID such as a HNu or other suitable field instrument. The Department shall be notified if any readings above background are obtained outside of the exclusion zone. The Department reserves the right to require additional qualitative air monitoring if readings sustained above background are obtained outside of the exclusion zone, downwind of the work site.
10. GE shall propose further Phase II/RFI investigations in their revised Phase II/RFI Proposal to determine if fill areas such as this one exist at the site.

If you have any questions regarding this matter, please contact the undersigned or Anthony Kurpaska of this office.

Sincerely,



Anna Symington
Acting Section Chief
Special Projects
Bureau of Waste Site Cleanup

AGS:AFK:afk
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