



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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BOSTON, MASSACHUSETTS 02114-2023

01-0600

June 20, 2003

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

Via Electronic and U.S. Mail

Re: Comments on General Electric's February 2003 submittal "*Plant Site 1 Groundwater Management Area NAPL Monitoring Report for Fall 2002*," GE - Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA's) conditional approval of the pre-design investigation activities described in the above-referenced "*Plant Site 1 Groundwater Management Area NAPL Monitoring Report for Fall 2002*" (NAPL Report). The NAPL Report is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the above-referenced submittal subject to the conditions presented in this letter.

Conditions

1. The detection of dense non-aqueous phase liquid (DNAPL) in monitoring well LSSC-8I is significant. GE shall take the following actions:
 - a. Check well LSSC-8I weekly for NAPL (as proposed by GE in their NAPL notification). Collect a sample of the DNAPL, if available, for analysis of physical and chemical parameters. If sample volume is an issue, prioritize the physical parameter analyses. Provide the results of any analyses in the next NAPL report.
 - b. Review the boring logs from the Lyman Street Removal Action Area (RAA) soil borings to see if NAPL shows were observed in the nearby soil borings.
 - c. Check for NAPL in nearby monitoring wells EPA-1, LSSC-32, LSSC-33 and LS-44 at least monthly.
 - d. Develop a geologic cross section through the area and update the local glacial till surface map to help determine potential DNAPL migration pathways.
2. GE is required to ensure that there is "no discharge of NAPL to surface waters and/or sediments, which shall include no sheens on surface water and no bank seeps of NAPL." At a minimum, GE shall walk the lower bank of the river adjacent to all parts of GMA-1 during each semi-annual NAPL monitoring round to inspect the bank for sheens or NAPL seeps. Additionally, GE shall inspect the riverbanks at East Street Area 2-South, Lyman Street and

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Newell Street Area II after high-flow events in the river (greater than 1,000 cfs at Coltsville) to ensure that NAPL isn't being flushed out of the riverbanks due to the rise and fall of riverbank groundwater levels. GE shall take special care to observe the ends of the sheetpile containment barriers and around discharge pipes.

3. GE observed NAPL sheen in boring RAA4-O15 during the East Street Area 2-South RAA investigation. GE also observed NAPL in a nearby soil boring during the installation of well 95-1 in 1996. GE shall implement monitoring for groundwater elevations and NAPL presence on a monthly basis at wells 95-1 and 3-6C-EB-22, which is just downgradient of soil boring RAA4-O15, and provide the monitoring results in the next NAPL report.
4. Maintaining the groundwater capture zones and product removal at the NAPL recovery systems is essential. GE shall provide information on how the recovery wells are maintained and discuss the schedule for evaluation and maintenance in subsequent submittals. GE provided separate data for each recovery well in this NAPL Report, which met the first step for the evaluation. Additional evaluation steps by GE should include tracking the specific discharge of the recovery wells (to check for well screen fouling) and plotting the efficiency of NAPL recovery (ratio of NAPL recovered per gallon of groundwater pumped) over time.
5. GE reports that no NAPL was recovered from caisson 64-S during December 2002 (once the system was tracked separately). The well was modified during September 2002 and EPA suspects that it will take time for the NAPL around the well to adjust to the lowering of the groundwater table. The caisson/well modification raises a question concerning the monitoring of the upper caisson (now cased off by the well extension) for LNAPL. Does water collect in the upper caisson section and does GE monitor it for NAPL? GE shall provide this information in the next NAPL monitoring submittal.
6. The recent high-flow event in the Housatonic River (2,100 cfs at Coltsville on March 29, 2003) should provide the information necessary to evaluate transient groundwater mounding behind the sheetpile containment barriers. GE discusses the data logger monitoring at the G2 sheetpile containment barrier, but concentrates on average conditions. GE shall evaluate transient conditions after a high flow event when a higher groundwater flow gradient could be created around the sheetpile containment barrier by the river stage decreasing faster than the groundwater elevations on the riverbank.
7. EPA's review of Figure 10 (2002 LNAPL extent) has identified two issues:
 - a. Two areas within the East Street Area 2-South LNAPL plume are not adequately monitored: The area around well 22 and the area just south of the two treatment plants. GE shall monitor LNAPL in the area of well 22 (utilizing well 22 or by installing a new well) and install one new LNAPL monitoring well along the road just south of the treatment plants.
 - b. GE shall include a discussion concerning apparent anomalies in NAPL presence, such as the area with no measurable LNAPL centered on wells 1R and E2SC-25 and the LNAPL areas greater than 1-ft thick centered on wells 25R and 26R, well 30 and well 95-7, in the Fall 2003 GMA-1 NAPL Monitoring Report.

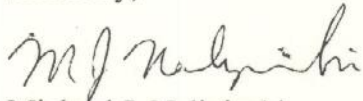
Errata

1. Several NAPL monitoring wells are not shown or could not be located on Figure 1; 31R (East Street Area 1-South), NS-11 (mis-labeled N2SC-11), all of the Cell J1 sheetpile containment barrier monitoring wells, and both LLR and well 45 (East Street Area 2-South).

EPA reserves its right to perform additional sampling in the areas subject to the GMA-1 NAPL Monitoring Program and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (617) 918-1268.

Sincerely,



Michael J. Nalipinski
GE Facility Project Manager

cc:	John Novotny,	GE
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