

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

Date: July 18, 2008
Subject: Pollution Report (POLREP) 2 and Final
Site: Former Oxbow Areas A&C Removal Action Area (RAA),
GE-Pittsfield/Housatonic River Site, 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: March 25, 2003
Demobilization Date: October 31, 2006
Completion Date: June 3, 2008
Last POLREP: March 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) within the GE-Pittsfield/Housatonic River Site. All activities completed by GE at the Former Oxbow Areas A&C RAA were performed pursuant to a statement of work (SOW), which is Appendix E to the CD.

The Former Oxbow Areas A&C RAA is an approximately 8-acre site located in Pittsfield, Massachusetts that is generally located to the south of the Housatonic River, beginning approximately 250 feet downstream of the Lyman Street Bridge. The Former Oxbow Areas A&C RAA is considered one of the Former Oxbow Areas under the CD and consists of seven parcels. Only the non-riverbank portion of these parcels is included in this RAA. The riverbank portions of these parcels are part of the 1.5 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 Former Oxbow Areas A&C RAA is being addressed under Groundwater Management Area # 5 pursuant to the CD and SOW and is not part of this pollution report.

In September 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. This work plan, conditionally approved by EPA on December 11, 2002, was variously revised and supplemented, with conditional approvals, through November 2004. Pursuant to this plan, starting in March 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 A&C POLREP 1 dated March 25, 2003. Addition documents are also available on 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 August 15, 2003 through October 29, 2004. 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 proposed response actions to meet the soil-related Performance Standards in Removal Design/Removal Action Work Plans, supplements, and addendums dated January 2005 through October 2006. 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, but, as described below, three parcels were cleaned to residential standards.

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 contamination are described in the SOW and in GE's Final Completion Report.

Following the investigations that were conducted at the seven 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. An air monitoring program was conducted during the removal phase of the construction process. The construction activities were generally performed between July and November 2006.

Following is a list of the parcels in the RAA with the applicable use designation, along with a description of the remediation work that has been conducted on the parcel following the investigation.

- I8-23-4: Commercial. Evaluated for PCBs only. Non-PCBs are being addressed by Exxon Mobil under MDEP oversight. Additional evaluation, soil removal, and restoration actions were conducted such that the parcel meets residential standards. Therefore, an ERE or Conditional Solution is not necessary.
- I8-23-5: Commercial. Evaluated for PCBs only. Non-PCBs are being addressed by Exxon Mobil under MDEP oversight. Additional evaluation, soil removal, and restoration actions were conducted such that the parcel meets residential standards. Therefore, an ERE or Conditional Solution is not necessary.
- I8-23-6: Recreational and Commercial with a Conditional Solution. The parcel is comprised of two areas with different designated uses: one commercial and the other recreational. Remediation included soil removal and restoration.

- I8-23-9: Commercial. Additional evaluation, soil removal, and restoration actions were conducted such that the site meets residential standards. Therefore, an ERE or Conditional Solution is not necessary.
- I8-23-10: Commercial with a Conditional Solution. No soil removal required.
- I9-5-1: Recreational with a Conditional Solution. Remediation included soil removal and restoration.
- I9-5-2: Recreational with a Conditional Solution. No soil removal required.

By cover letter dated May 12, 2008, GE submitted a Final Completion Report for the Former Oxbow Areas A&C 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 May 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 June 3, 2008, EPA issued GE a Certificate of Completion for the Former Oxbow Areas A&C 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 5,985 cubic yards, which was disposed of at the following locations: Building 71 OPCA (1,710 cubic yards), Hill 78 OPCA (4,100 cubic yards), and Model City New York facility (175 cubic yards).

For additional details, see the Former Oxbows Areas A&C Final Completion Report, June 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 the 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 # 5.

POLREP DISTRIBUTION LIST

Date and Polrep #: July 18, 2008 POLREP #2

Project: Former Oxbow Areas A&C Removal Action Area (GE-Pittsfield/Housatonic Site)

John Kilborn, Senior Enforcement Counsel, OES
Bob Cianciarulo, Chief, MA Superfund, OSRR
Richard Cavagnero, Deputy Director, OSRR
Dean Tagliaferro, GE Team Leader, OSRR
Cheryl O'Halloran (CERCLIS Coordinator), OSRR
Brenda Haslett, (CERCLIS Coordinator), OSRR
Site File c/o Holly Inglis, OSRR