



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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01-0499
SDMS # 36449

July 8, 2002

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 January 2002 Pre-Design Investigation Work Plan for Floodplain Properties Adjacent to the 1 1/2-Mile Reach of the Housatonic River, General Electric/Housatonic River Project Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the pre-design investigation activities for the Phase 1, Group 1A and Group 1B, properties in the above-referenced "*Pre-Design Investigation Work Plan for Floodplain Properties Adjacent to the 1 1/2-Mile Reach of the Housatonic River*," (PDIWP). The PDIWP 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.

General Electric (GE) will provide Phase/Group-specific addenda to the PDIWP for EPA's review and approval in a phased approach. GE proposes to conduct the pre-design investigations and subsequent remedial design/remedial action (RD/RA) activities for the 1 1/2-Mile Floodplain Removal Action Area (RAA) in phases to coincide with EPA's removal activities in the 1 1/2-Mile Reach. This approach will require extensive coordination and cooperation between EPA and GE to minimize intrusive investigations and disruption to the property owners during various phases of the construction and remediation activities. As discussed below, GE shall provide EPA with a proposed schedule for the pre-design investigation activities for each proposed phase that would allow the review and conditional approval of RD/RA work plans for the 1 1/2-Mile Floodplain Properties in a reasonable time frame prior to initiation of EPA's construction and remediation activities in the 1 1/2-Mile Reach.

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 following conditions:

General Conditions

1. EPA, with MDEP, provides conditional approval of only the Phase 1, Group 1A and Group 1B, properties identified in the above-referenced PDIWP. GE will provide Phase/Group-specific addenda to the Work Plan for EPA's review and approval in a phased approach to coincide with EPA's proposed schedule for construction and remediation activities in the 1 1/2-Mile Reach.

2. The PDIWP proposes that the pre-design soil sampling investigations be conducted in an iterative manner over progressive depth intervals. The initial sampling will focus only on polychlorinated biphenyls (PCBs). GE proposes to collect PCB samples to a maximum depth of 10 feet below ground surface, and analyze the samples in an iterative manner over increasing depth. This approach is acceptable as long as GE will return to the sample locations to obtain samples at deeper depth increments, if the analytical data indicate that PCB contamination may extend below the proposed 9- to 10-foot depth increment.
3. The initial grid-like sampling layout on individual properties (residential, commercial, or recreational) should be uniformly spaced, except that more widely spaced sampling locations may be used in portions of the properties farther from the river where the existing data and characteristics of the properties indicate that PCB concentrations are likely to be non-detectable or very low. The actual sampling locations may be modified to account for site conditions and previous data. EPA reserves the right to require additional sampling in the future if the data indicate that a more uniform grid or more dense sampling is required in particular areas to support future RD/RA activities.
4. The PDIWP presents three maps, Figures 1-1, 1-2, & 1-3, which depict the 1½-Mile RAA Floodplain Properties that were the subject of this PDIWP. The PDIWP also presents ten maps, Figures 4-1 through 4-10, which depicts the existing and proposed sampling/boring locations. The 1-ppm PCB isopleth line (purple) is presented on Figures 1-1 through 1-3 and identified as such in the legend. The 10-year floodplain line (red) appears to be depicted on Figures 1-1 through 1-3, but is not identified in the legend. The more recent EPA and GE sampling data suggest that contamination is not restricted to the 10-year floodplain. GE shall include the 10-year floodplain line and topographic contour lines on the large figures and depict PCB concentrations at various sample locations to show variations in PCB concentrations with depths in future addenda for subsequent PDIWP phases.
5. The PDIWP proposes to conduct the pre-design investigations and subsequent RD/RA activities for the 1 ½-Mile Floodplain RAAs in phases to coincide with EPA's removal activities in the 1 ½-Mile Reach. This approach will require extensive coordination and cooperation between EPA and GE to minimize intrusive investigations and disruption to the property owners during the various construction and remediation activities. Since the EPA-lead remediation of the 1 ½-Mile Reach of the Housatonic River may take over 4 to 5 years to complete, proposed schedules for the pre-design investigation activities for each phase should be developed that would allow the review and conditional approval of RD/RA work plans for the 1 ½-Mile Floodplain Properties in a reasonable time frame prior to initiation of EPA's 1½-Mile Reach construction and remediation activities.

If feasible, EPA will advise GE of its likely timing for initiating removal actions for a given phase or stage of the 1 ½-Mile Reach project at least 12 months prior to the

anticipated commencement date for that phase or stage. GE shall then submit a proposed schedule for the submission of the Phase- and/or Group-specific Work Plan Addendum for the corresponding section of the floodplain. That schedule shall provide for submission of such Phase- and/or Group-specific Addendum at least 10 months prior to the initiation of EPA's removal activities in that section of the 1 ½-Mile Reach.

Fieldwork associated with the first phase of EPA's 1½-Mile Removal Action is scheduled to begin by August or September 2002. GE shall complete the pre-design investigation activities in the specific areas that will be affected by these access road construction activities as soon as practicable after EPA's approval of the Work Plan Addendum for the Phase 1, Group 1A and 1B, properties (discussed below), and shall coordinate its activities with EPA's road construction activities to minimize interferences by each set of activities with the other.

6. The PIDWP excludes the riverbank portions of the 1 ½-Mile Reach where EPA will be performing removal actions. The final location of the GE top-of-bank line and the EPA limit-of-excavation line for the section of the 1½-Mile Reach from the Lyman Street bridge to the Elm Street bridge have been determined. The final location of the GE top-of-bank line and the EPA limit-of-excavation line from the Elm Street bridge to the confluence will require further discussions between GE and EPA and shall be agreed to prior to GE's submittal of subsequent addendums.
7. Specific comments to the PIDWP relating to the 1 ½-Mile Reach RAA Floodplain Properties in Phase 2, Phase 3, and Phase 4, designated as Group 2, Groups 3A, 3B, 3C, & 3D, and Groups 4A, 4B, & 4C, will be postponed until after the submission and review of the Phase 1, Groups 1A and 1B, Work Plan Addendum. Work Plan Addenda submissions will require, at a minimum, a letter describing the proposed activities and any revised tables and figures, as appropriate. GE shall revise site maps, at a minimum, to illustrate any changes in parcel ownership, property lines, and property uses in future work plan addenda.
8. GE's proposed iterative approach to evaluating the amount of additional Appendix IX sampling appears to be reasonable. However, GE should include the existing EPA and GE Appendix IX data in the Phase 1 Work Plan Addendum.

Conditions Specific to Phase 1, Groups 1A and 1B

1. Parcel I8-24-6 and Parcel I9-4-13 were recently combined into Parcel I8-24-301 for tax purposes. However, since new Parcel I8-24-301 includes the former Parcel I8-24-6, additional soil sample locations should be identified in the Phase 1 Work Plan Addendum.

GE shall address the general conditions in this letter by providing various Phase/Group specific addenda to the Work Plan for EPA's review and approval at future date(s), as discussed in Comment 5 above.

GE shall address the specific condition no. 9 in this letter by providing the first addendum to the Work Plan specifically for the Phase 1, Groups 1A and 1B, properties. In order to facilitate GE's initiation of the proposed pre-design investigation for the Phase 1, Group 1A and 1B, properties, GE shall prepare a letter addressing the above specific condition within 15 days of the date of this letter. EPA will consider this submission to be the Work Plan Addendum. EPA will review and approve this letter, Phase 1, Groups 1A and 1B, Work Plan Addendum, within 15 days of its receipt.

EPA reserves its right to perform additional sampling in the areas subject to Work Plan 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: Dick Gates, GE
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