



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

01-0563
SDMS # 43055

April 14, 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 (GE) February 2003 *Pre-Design Investigation and PCB Soil Evaluation Report for Phase 1 Floodplain Properties Adjacent to the 1 1/2-Mile Reach of the Housatonic River*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) comments on the pre-design investigation activities for the above-referenced document (Report). The 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 Report, subject to the following conditions:

1. A number of minor inconsistencies were noted in the various field notes and logs presented in the Report by GE's contractor, BB&L, when compared to those prepared by EPA's oversight contractor, Weston Solutions, Inc. (Weston). GE shall discuss these inconsistencies with Weston.
2. In Section 4 of the Report, GE states that it believes that "there is no need for additional sampling and/or an evaluation for non-PCB Appendix IX+3 constituents in soil at these properties." GE bases this conclusion upon the SOW, Appendix E to the CD, Section 2.5.2.8 (b), which provides that, "For floodplain properties located downstream of the GE Plant Area, where there are intervening potential sources of non-PCB constituents, GE may exclude from the evaluation particular properties (or portions of properties) where response actions are not necessary to address PCBs." In Section 4 of the Report, GE claims that the Group 1 properties meet this SOW provision because the Group 1 properties are located downstream of the GE Plant Area, "there are intervening potential sources of non-PCB constituents (e.g., the Lyman Street Area and Former Oxbow Area C)", and, finally, no response actions are necessary to address PCBs. While EPA agrees that no further response actions are required to address PCBs and, therefore, that no

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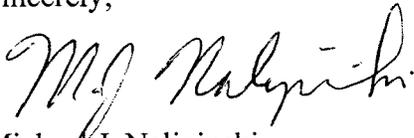
further evaluation is required for non-PCB constituents, EPA does not necessarily agree that the Lyman Street Area and Former Oxbow Area C are sources of non-PCB constituent(s).

3. In Section 5 of the Report, Future Activities and Schedule, GE states that GE anticipates that EPA will advise GE prior to commencing removal activities for a given phase or stage of the 1 ½-Mile Reach Removal Action. Based on EPA's conditional approval letter of April 9, 2003 for the Phase 2, Group 2 floodplain properties, GE will conduct sampling of the Phase 2, Group 2 properties prior to commencement of EPA's 1 ½ Mile Reach construction activities on these properties.

EPA reserves its right to perform additional sampling and/or require additional sampling or Response Actions in these areas, 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
James Bieke, Shea & Gardner
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