01-0894

GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Courier

November 2, 2005

Mr. William P. Lovely, Jr. (MC HBO)
USEPA – New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Re: GE-Pittsfield/Housatonic River Site
Unkamet Brook Area (GECD170)
Addendum to Pre-Design Investigation Report

Dear Mr. Lovely:

On September 7, 2005, the General Electric Company (GE) submitted a *Pre-Design Investigation Report for Unkamet Brook Area Removal Action* (PDI Report). That report presented the results of the pre-design investigations at the Unkamet Brook Area and proposed certain additional soil investigations at that area, to be carried out following approval by the U.S. Environmental Protection Agency (EPA) and then reported in a Supplemental PDI Report. Since that time, based on further review of the available soils data, GE has identified certain additional soil sampling that it would like to carry out at this area. Therefore, it is submitting this Addendum to the PDI Report to propose that additional sampling beyond the supplemental investigations proposed in the PDI Report.

GE has determined that one of the commercial/industrial properties in this area, Parcel K11-7-8 (whose location is shown on Figure 1), likely already meets the soil-related Performance Standards that would apply to residential properties. Achieving the residential Performance Standards at this property would avoid the need to seek a Grant of Environmental Restriction and Easement (ERE) or to implement a Conditional Solution at this property. However, application to this property of the Performance Standards for residential properties would require additional sampling for PCBs on a sampling grid that is consistent with the requirements for residential properties in the *Statement of Work for Removal Actions Outside the River* (SOW). Accordingly, to complete an evaluation of whether this property meets the residential Performance Standards, GE proposes to conduct additional sampling at that property.

The SOW requires PCB sampling of residential properties at the Former Oxbow Areas on a 25-foot grid for the top foot of soil and a 50-foot grid for soil deeper than one foot (SOW, Technical Attachment D, p. 7). Assuming that these same grids would apply to residential properties at the Unkamet Brook Area (if there were any), such grids have been superimposed on Parcel K11-7-8, starting with the grids previously used in the pre-design investigation of this portion of the Unkamet Brook Area. These grids are shown on Figure 2.

Although the SOW states that samples from the top foot at residential properties should be collected from the 0- to 0.5-foot and 0.5 to 1-foot depth intervals, EPA has approved an alternative sampling approach for the residential properties at Former Oxbow Areas J and K, under which surface samples were collected from the 0- to 1-foot depth increment. Applying that same approach here, GE proposes to collect samples from the 0- to 1-foot depth increment at the 25-foot grid nodes on Parcel K11-7-8 where such surface samples were not previously collected. These additional sampling locations are identified on Figure 2. These samples will be submitted for PCB analysis.

In addition, GE proposes to advance soil borings at the 50-foot grid nodes on this property where borings were not previously advanced for the collection of subsurface samples. These additional soil boring locations are also shown on Figure 2. At each of these boring locations, in addition to the collection of surface samples from the 0- to 1-foot depth increment (at locations where surface samples were not previously collected), subsurface samples will be collected, beginning at one foot below the ground surface (bgs), to a depth of 15 feet. Although the SOW states that subsurface samples at residential properties should be collected in two-foot depth intervals, GE proposes, for this property, to collect the subsurface samples from depth increments of 1 to 3 feet, 3 to 6 feet, and 6 to 15 feet for two reasons: (1) for consistency with the existing subsurface PCB data from this property (which were collected in those depth increments); and (2) because the existing subsurface PCB data from this property show no detected PCBs. The samples from the 0- to 1-foot and 1- to 3-foot depth increments will be submitted for PCB analysis, and the deeper samples will be held at the laboratory and will be analyzed for PCBs iteratively if samples from the depth increment above them show detected PCBs. For purposes of applying the residential Performance Standard of 2 ppm, if PCBs are detected in any sample deeper than one foot, all the existing and new PCB data from depth increments from one foot bgs to the depth at which PCBs were detected will be averaged, using the spatial averaging procedures specified in the SOW, to determine the average PCB concentration in the 1- to X-foot depth increment, where X equals the depth at which PCB were detected at the property.

With respect to the non-PCB constituents listed in Appendix IX of 40 CFR Part 264 (excluding pesticides and herbicides) plus three additional constituents – benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine (Appendix IX+3), the applicable requirement in the SOW for sampling residential properties calls for the analysis of a minimum of three Appendix IX+3 samples per property. This requirement has already been met at Parcel K11-7-8. Hence, no additional general characterization sampling for non-PCB constituents is necessary at this property to meet the SOW's sampling requirement for residential properties.

GE has also reviewed the existing Appendix IX+3 data from this property to determine whether there are specific data needs to support the evaluation of whether the property would meet the Performance Standards for residential properties. For this property, GE has: (a) compared the maximum concentrations of dioxin Toxicity Equivalency Quotients (TEQs) in the 0- to 1-foot and 1- to 15-foot depth increments to the CD's Performance Standard for such TEQs at residential areas (1 ppb); and (b) compared the average concentrations of the other non-PCB constituents (which were not screened out) in each of those depth increments to the "Wave 2" Method 1 S-1 soil standards proposed by the Massachusetts Department of Environmental Protection (MDEP) in September 2004 (as modified in May 2005), which are expected to be finalized prior to the performance of the remediation at this RAA. Based on that review, GE has not identified any specific non-PCB data needs at Parcel K11-7-8

The supplemental PCB sampling described above at Parcel K11-7-8 is proposed as an addition to the proposed additional investigations described in the PDI Report. Following EPA approval of those investigations, as supplemented by this addendum, GE will carry out those investigations and present the results in the Supplemental PDI Report in accordance with schedule described in the PDI Report.

Please call me if you have any questions or comments regarding this supplemental proposal.

Sincerely,

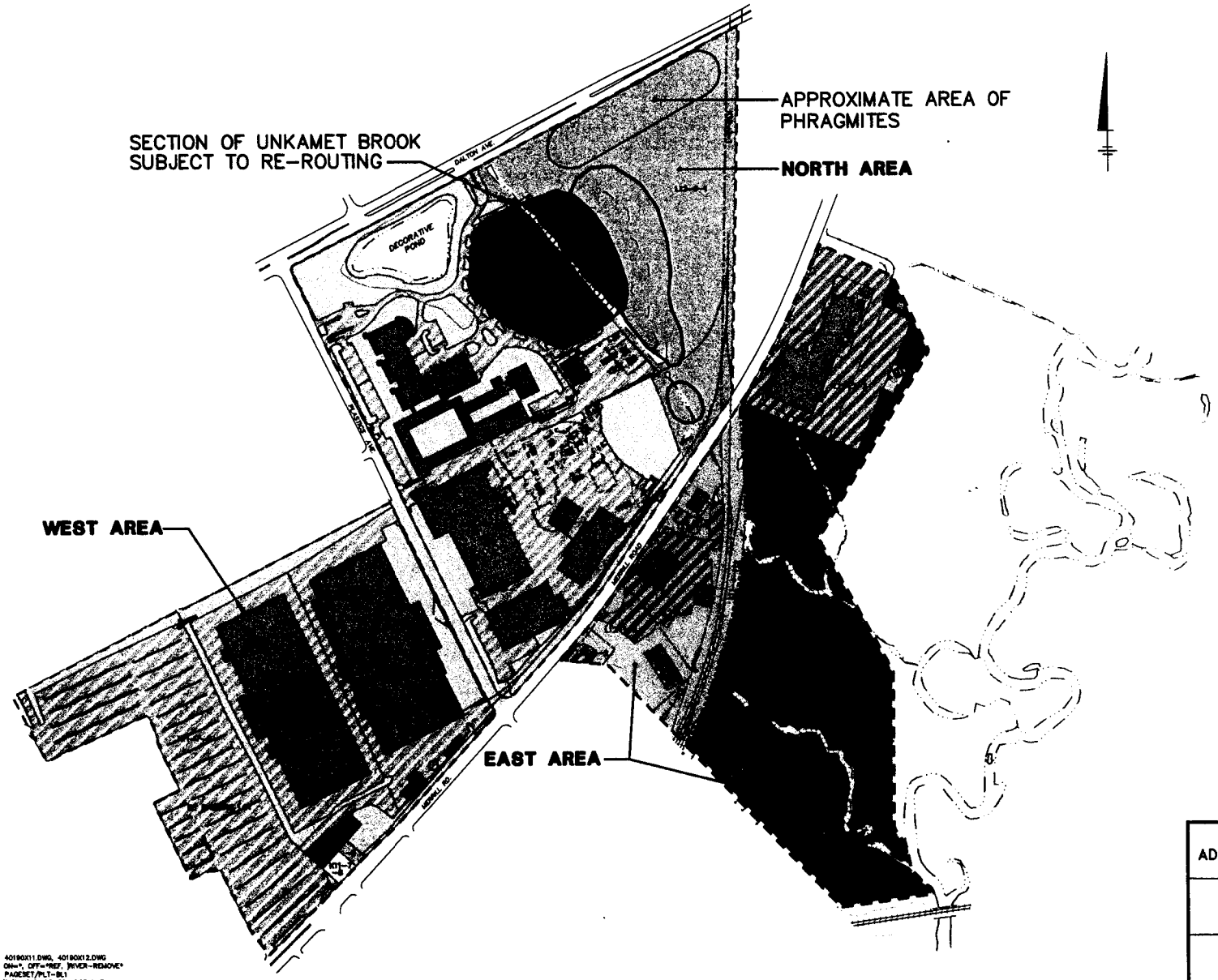
John F. Novotny /NMC

John F. Novotny, P.E.
Manager – Facilities and Brownfields Programs

Attachments
V:\GE_Pittsfield_CD_Unkamet_Brook_Area\Reports and Presentations\Addendum to PDI\65552196.doc

cc: Dean Tagliaferro, EPA
Tim Conway, EPA
John Kilborn, EPA
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Robert Bell, MDEP*
Thomas Angus, MDEP*
Nancy E. Harper, MA AG*
Dale Young, MA EOEA*
Mayor James Ruberto, City of Pittsfield*
Michael Carroll, GE*
Andrew Silfer, GE
Rod McLaren, GE*
James Nuss, BBL
James Bieke, Goodwin Procter LLP
Property Owner - Parcel K11-7-8
Public Information Repositories
GE Internal Repository

* *without attachments*



LEGEND:

- APPROXIMATE REMOVAL ACTION AREA BOUNDARY
- FENCE
- PROPERTY LINE
- L12-3-1 PROPERTY IDENTIFICATION
- APPROXIMATE EDGE OF WATER
- INTERMITTENT STREAM
- RAILROAD TRACK
- 100-YEAR FLOODPLAIN BOUNDARY (DASHED WHERE INFERRED)
- APPROXIMATE PALUSTRINE/EMERGENT WETLANDS BOUNDARY
- PAVED AREA
- WATER
- BUILDING
- GE-OWNED INDUSTRIAL PROPERTY
- NON-GE OWNED COMMERCIAL/INDUSTRIAL PROPERTY
- NON-GE OWNED NON-INDUSTRIAL/RECREATIONAL PROPERTY
- GE-OWNED FORMER INTERIOR LANDFILL
- GE-OWNED NON-INDUSTRIAL PROPERTY
- FORMER BUILDING LOCATION
- PROPERTY SUBJECT TO SUPPLEMENTAL SAMPLING (NON-GE OWNED COMMERCIAL/INDUSTRIAL PROPERTY)

NOTES:

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS. ADDITIONALLY, CONSTRUCTION PLANS PROVIDED BY GENERAL ELECTRIC COMPANY WERE USED.
2. SITE BOUNDARIES ARE APPROXIMATE.
3. NOT ALL PHYSICAL FEATURES SHOWN.
4. EXTENT OF PAVED/UNPAVED AREAS IS APPROXIMATE.
5. 100-YEAR FLOODPLAIN BOUNDARY IS BASED ON FLOOD ELEVATION PUBLISHED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY: "FLOOD INSURANCE STUDY - CITY OF PITTSFIELD, MASSACHUSETTS" JANUARY 19, 1987; AND "FLOOD INSURANCE RATE MAP - CITY OF PITTSFIELD, MASSACHUSETTS" (PANELS 250037 0010C AND 25037 0020C), FEBRUARY 19, 1982, AND TWO-FOOT CONTOUR TOPOGRAPHIC MAPPING GENERATED PHOTOGRAMMETRICALLY IN 1990 AT A BASE SCALE OF 1:2,400.
6. TAX ASSESSOR'S PARCEL IDENTIFICATION NUMBERS AND BOUNDARY INFORMATION OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE AND IS CURRENT THROUGH JUNE 19, 2002.

0 400' 800'
GRAPHIC SCALE

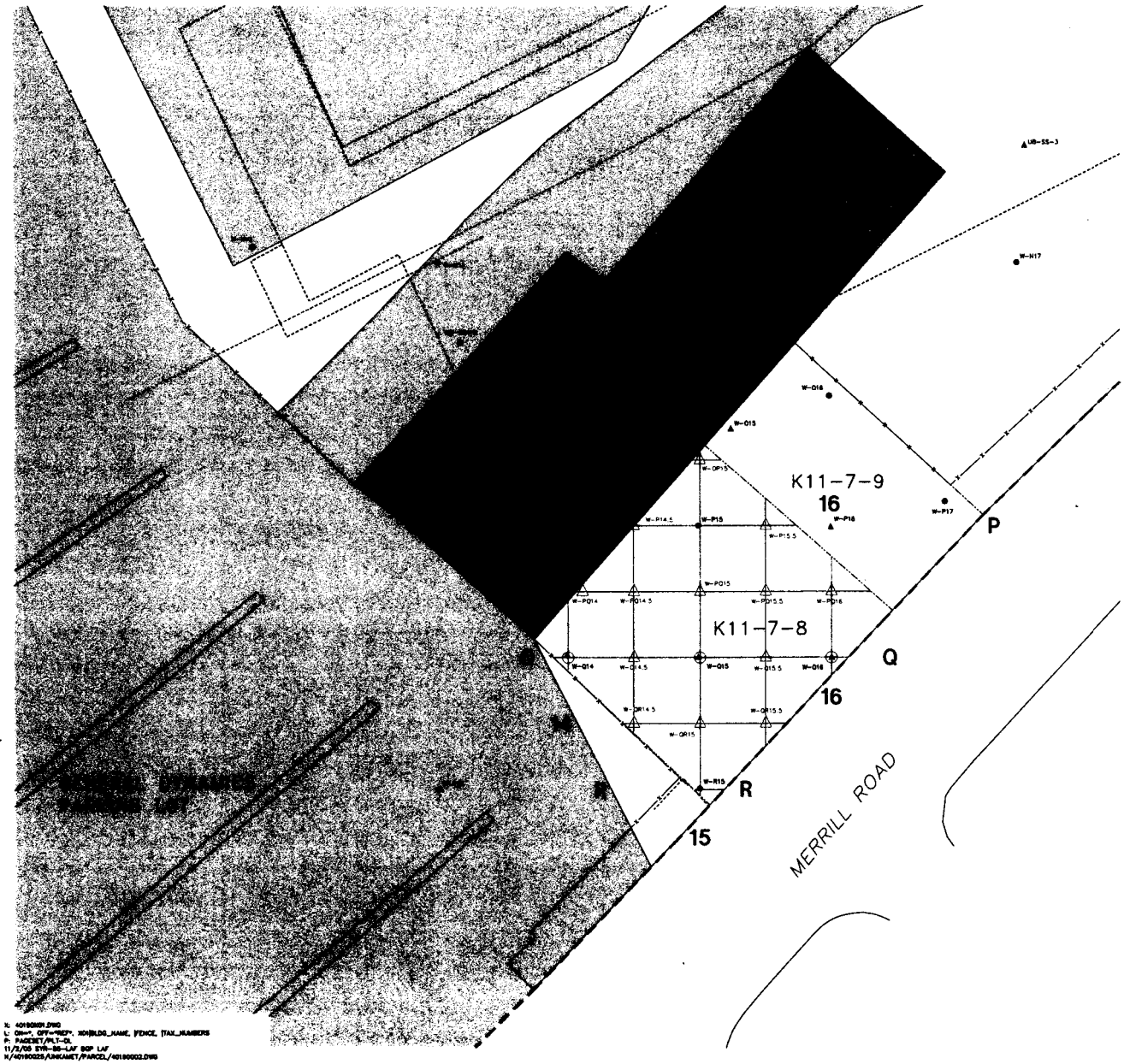
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
ADDENDUM TO PRE-DESIGN INVESTIGATION REPORT FOR UNKAMET BROOK AREA

SITE MAP

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE 1

X: 40190X11.DWG, 40190X12.DWG
L: ON=*, OFF=*REF, RIVER-REMOVE*
P: PAGESET/PLT-BL1
11/2/05 SYR-BS-BDL BGP LAF
N/40190025/UNKAMET/PARCEL/40190001.DWG



LEGEND:

- PORTION OF REMOVAL ACTION AREA SHOWN ON THIS FIGURE
- PROPERTY LINE
- FENCE LINE
- K11-7-8 PROPERTY IDENTIFICATION
- STORM SEWER
- SANITARY SEWER
- FIRE PROTECTION MAIN
- ELECTRIC/TELEPHONE CONDUIT
- 50-FOOT PCB SAMPLING GRID
- 25-FOOT PCB SAMPLING GRID
- PAVED AREA
- BUILDING
- W-P15 EXISTING SOIL BORING LOCATION
- W-Q15 EXISTING SURFACE SOIL SAMPLE LOCATION
- PROPOSED SURFACE SOIL SAMPLE LOCATION (0- TO 1- FOOT SAMPLE DEPTH)
- PROPOSED SOIL BORING LOCATION (1-FOOT OR GREATER SAMPLE DEPTH)

NOTES:

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS. ADDITIONALLY, CONSTRUCTION PLANS PROVIDED BY GENERAL ELECTRIC COMPANY WERE USED.
2. NOT ALL PHYSICAL FEATURES SHOWN.
3. EXTENT OF PAVED/UNPAVED AREAS IS APPROXIMATE.
4. TAX ASSESSOR'S PARCEL IDENTIFICATION NUMBERS AND BOUNDARY INFORMATION OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE AND IS CURRENT THROUGH SEPTEMBER 20, 2002.
5. ALL LOCATIONS ARE APPROXIMATE.
6. ONLY EXISTING PCB SAMPLE LOCATIONS USED FOR CHARACTERIZATION OF SITE SOILS AND SEDIMENTS ARE SHOWN. REFER TO THE MAY 2003 "REVISED PRE-DESIGN INVESTIGATION WORK PLAN FOR UNKAMET BROOK AREA REMOVAL ACTION" FOR SOIL SAMPLES THAT HAVE BEEN ELIMINATED FROM FURTHER CONSIDERATION.

0 20' 40'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
ADDENDUM TO PRE-DESIGN INVESTIGATION REPORT FOR UNKAMET BROOK AREA

PARCEL K11-7-8 - PROPOSED AND EXISTING PCB SOIL SAMPLE LOCATIONS

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE 2

FILE: 40190001.DWG
LT: DEF=1, OFF=PROP*, XOF|BLDG_NAME, |FENCE, |TAX_NUMBERS
P: PARCEL/PLT-GL
11/3/05 SYR-BB-LAF BGP LAF
H:/40190025/UNKAMET/PARCEL/40190002.DWG