



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

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BOSTON, MASSACHUSETTS 02114-2023

01-0459

February 28, 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 Company's (GE) December 20, 2001 report titled Hill 78 On-Plant Consolidation Area Geophysical Testing Results and Environmental Protection Agency's recommended GMA-4 soil boring locations at Hill 78, GE Housatonic River Project Site, Pittsfield, Massachusetts.**

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced December 20, 2001 report titled Hill 78 On-Plant Consolidation Area Geophysical Testing Results. EPA's recommended locations for GMA-4 soil borings RAA9-1 and RAA9-2 are also included in this letter.

The Hill 78 On-Plant Consolidation Area (OPCA) Geophysical Testing Results 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 following conditions:

1. GE shall review the positioning of the EM-61 survey grids and monitoring well locations on the base maps to ensure that the anomalies detected during the survey are properly located. The locations of the EM-61 anomalies in the concrete pad area east of the Hill 78 OPCA appear to be shifted off center and the EM-61 response observed at other monitoring well locations is absent at monitoring well location H78B-18.
2. The EM-61 response north of the fence corner east of the Hill 78 OPCA may represent more than the influence of the metal fence. EPA considers the northern most portion of this EM-61 response area an anomaly. GE shall investigate the extent of this anomaly. Although monitoring well OPCA-MW-4 is located nearby, the spring 2001 groundwater flow elevation contours suggest that OPCA-MW-4 is cross gradient rather than downgradient from this anomaly and this well would not serve as a monitoring point for potential contamination related to the observed anomaly.
3. A series of moderate size EM-61 anomalies, not identified as anomalies by GE on Figure 1, were detected south-southeast of the Hill 78 OPCA. These anomalies require further investigation since they appear to extend beyond the planned extent of the Hill 78 OPCA. GE shall conduct supplemental geophysical investigations (i.e., EM-61 supplemented by Ground Penetrating Radar) to better delineate the extent of these anomalies.
4. The anomaly noted in condition No. 2 and the large anomaly identified between Building 78 and the Hill 78 OPCA appear to extend beyond the extent of the EM-61 survey grids. These anomalies require additional delineation. GE shall conduct supplemental geophysical investigations (i.e., EM-61 supplemented by Ground Penetrating Radar) to better delineate the extent of these anomalies.

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5. Once the location and extent of the identified anomalies has been determined, GE shall propose additional soil characterization activities to determine the nature of the anomalies or extend the final Hill 78 OPCA cover system over the identified anomalies. EPA recommends that GE investigate the anomalies with the objective of ensuring that drummed liquid material is not located at such anomalies. One definitive method to accomplish the above objective would be to conduct limited test pits at selected locations rather than installing soil borings. Test pits typically provide a far more extensive view of the subsurface conditions than small diameter soil borings. Single soil borings may miss the source of the anomalous EM-61 responses or any potential contamination associated with the anomalies.

As part of the Plant Site 3 Groundwater Management Area (GMA-4) Baseline Monitoring Program GE proposed a till interface investigation near the Hill 78 OPCA involving the installation of two soil borings (RAA9-1 and RAA9-2) to be advanced down to the top of till interface to determine if DNAPL is present. Concerned that the proposed soil boring locations might not coincide with the deepest portion of the till trough identified in earlier investigations, EPA conducted an Earth Resistivity geophysical survey at Hill 78 to help identify the bottom of the till trough. Based on the results of the Earth Resistivity geophysical survey, EPA proposes that soil borings RAA9-1 and RAA9-2 be installed at the locations identified on Figure 1. EPA's interpretation of the Earth Resistivity geophysical survey results identifies the depth to the top of the till interface to be approximately 70 to 80 feet below ground surface at EPA's proposed soil boring locations south of the Hill 78 OPCA.

EPA reserves its right to perform additional sampling related to the Hill 78 OPCA and/or to 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 Nalipinski  
GE Facility Project Manager

Attachment

cc: Andrew Silfer, GE  
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