



01-0564

Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue, Pittsfield, MA 01201

SDMS # 43601

Transmitted Via Facsimile and Overnight Delivery

April 16, 2003

Mr. Bryan Olson
EPA Project Coordinator
U.S. Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
Floodplain Residential and Non-Residential Properties Adjacent to the 1½ Mile
Reach of Housatonic River (GEC710 and GEC720)
Response to EPA's April 9, 2003 Conditional Approval Letter for Phase 2, Group 2
Floodplain Properties**

Dear Mr. Olson:

In January 2002, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a document titled *Pre-Design Investigation Work Plan for Floodplain Properties Adjacent to the 1½ Mile Reach of the Housatonic River* (PDI Work Plan). That document was prepared in accordance with the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site (the Site) and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW). The PDI Work Plan identified initial pre-design polychlorinated biphenyl (PCB) soil investigations proposed for two of the Removal Action Areas (RAAs) within the Site: 1) Actual/Potential Lawns of the Floodplain Current Residential Properties Adjacent to the 1½ Mile Reach; and 2) the non-riverbank portions of the Floodplain Non-Residential Properties Adjacent to the 1½ Mile Reach. That Work Plan proposed to conduct those pre-design investigations in phases, corresponding approximately to the phases of work being conducted by EPA on corresponding reaches of the Housatonic River and its banks as part of the 1½ Mile Reach Removal Action. This letter relates to the floodplain properties in Phase 2, Group 2 of the 1½ Mile Floodplain RAAs (i.e., those located between Elm Street and Dawes Avenue).

Following submittal of the PDI Work Plan, GE determined that the data table presented in that Work Plan relating to the Phase 2 properties (Table 4-3) did not accurately reflect the soil removal activities previously performed at certain floodplain properties within that phase. Thus, in a letter dated March 11, 2003, GE provided a revised Table 4-3 to EPA and -- in consideration of EPA's anticipated schedule for the 1½ Mile Reach Removal Action -- proposed to submit a PDI Work Plan Addendum for the Phase 2 properties by July 15, 2003. However, following a March 20, 2003 meeting with GE, EPA issued a conditional approval letter dated April 9, 2003, approving the pre-design investigations proposed in the PDI Work Plan for the Phase 2 properties subject to certain conditions identified by EPA in that letter. In that letter, EPA directed that, instead of submitting an addendum for these properties, GE should submit

(within 7 days) a letter addressing the conditions in EPA's April 9 letter, including the proposed additional sampling activities and a proposed sampling schedule.

This letter addresses each of the conditions in EPA's April 9, 2003 conditional approval letter and presents a proposed schedule for the performance of initial pre-design investigations at these properties. In addition, we are attaching a revised Figure 4-3 showing the proposed (and existing) sampling locations at these properties, and a new Table 1 listing the locations of the proposed soil borings and the depths from which samples will be collected from those borings. The attached Figure 4-3 and Table 1 reflect both the investigations previously proposed for the Phase 2 properties in the PDI Work Plan and the additional sampling activities described below. Unless otherwise noted below, the procedures, protocols, and methodologies established in the PDI Work Plan remain unchanged.

A. Pre-Design Activities - Phase 2 Properties

Several of the conditions presented in EPA's April 9, 2003 letter are specific to the scope of the soil sampling and investigations, and are addressed below.

1. In Condition No. 2 of its April 9, 2003 conditional approval letter, EPA indicated that its project database has been updated since submittal of the PDI Work Plan, and it directed GE to update the appropriate data tables and figures for inclusion in the future Pre-Design Investigation Report for the Phase 2 properties. GE will incorporate this information into its future reports. Also, on a related matter, please note that a recent review of the City of Pittsfield Tax Assessors Records revealed that Parcel I8-4-1 has now been redesignated as Parcel I8-4-101. That new parcel number is shown on the attached figure.
2. EPA's Condition Nos. 3 and 5 require GE to perform additional soil sampling, beyond the sampling proposed in the PDI Work Plan, for certain properties in Phase 2 – namely, Parcel I8-4-101, Parcels I8-4-2, 3, & 4 (which comprise one commonly owned property), and Parcel I8-4-201/202.

Parcels I8-4-101 and I8-4-2, 3, & 4

For these residential properties, which were previously subject to soil investigations and soil removal/replacement activities, the proposed pre-design soil investigations will include additional soil sampling and analyses to further assess the depth at which PCBs are detected in soils (to a maximum depth of 15 feet). As shown on Figure 4-3, pre-design sampling will occur at four of the previous sampling locations (sample IDs corresponding to the new sample locations are presented in parentheses): I8-4-1-7 (2-SB-12); I8-4-2,3,4-2 (2-SB-13); I8-4-2,3,4-10 (2-SB-14); and I8-4-2,3,4-20 (2-SB-15). At each of these locations, borings will be advanced and subsurface samples will be collected beginning from the depth increment immediately below the previous depth of sampling and extending to a depth of 15 feet. The depth increments from which these samples will be collected are shown in Table 1. For example, at sample location I8-4-1-7 (new boring 2-SB-12), where there are existing data to a depth of 5 feet below ground surface (bgs), sample collection will be initiated at 5 feet bgs and proceed in two-foot intervals to a depth of 15 feet (i.e., 5- to 7-foot, 7- to 9-foot, 9- to 11-foot, 11- to 13-foot, and 13- to 15-foot depth intervals). Samples will be submitted for analysis of PCBs using an iterative approach, in which the uppermost two samples collected will initially be analyzed for PCBs and the deeper samples will be held. If the results from the deepest sample initially analyzed indicate detectable PCBs, deeper depth increments will be analyzed, as necessary.

In addition, at certain of the locations identified above, GE proposes to conduct sampling and analysis for 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). Specifically, soil samples will be collected for Appendix IX+3 analyses from three of the proposed locations identified above: I8-4-1-7 (2-SB-12); I8-4-2,3,4-10 (2-SB-14); and I8-4-2,3,4-20 (2-SB-15). These samples will be collected from a 2-foot depth increment located immediately or very close beneath the previous depth of soil excavation at each location. Specifically, considering the prior soil removal depths at these locations, these samples will be collected from the 1- to 3-foot depth increment at location 2-SB-12, the 5- to 7-foot depth increment at location 2-SB-14, and the 4- to 6-foot depth increment at location 2-SB-15, as shown on Table 1.

This Appendix IX+3 sampling and analysis at these previously remediated properties will be considered a screening-level effort. As such, if the results at a given parcel do not show any exceedances of the applicable standards for these constituents in soil at residential properties, no additional Appendix IX+3 sampling at that parcel will be necessary. However, if the results do show such an exceedance, GE will evaluate the need for and scope of additional sampling for the relevant constituents, as part of its evaluation discussed in Section B of this letter.

Parcels I8-4-201/202

The PDI Work Plan proposed to collect several surface and subsurface samples at this property. As required by EPA's Condition No. 5, GE will advance one additional boring on this property (2-SB-16, as shown on revised Figure 4-3) in the vicinity of several prior sampling locations to further assess the vertical extent of PCBs. Samples from this proposed boring will be collected from the same depth increments specified in the PDI Work Plan for the other soil borings on this property (i.e., 0 to 1 foot, 1 to 3 feet, 3 to 5 feet, 5 to 7 feet, and 7 to 9 feet), as shown in Table 1, and will be analyzed for PCBs iteratively consistent with the protocol identified in the PDI Work Plan for the other borings on this property (i.e., beginning with the uppermost three depth increments). Sufficient sample volume will be obtained to allow EPA's representative to obtain a split sample.

B. Proposed Schedule

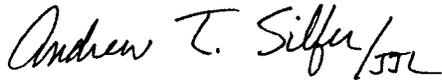
Condition No. 1 of EPA's conditional approval letter requires that GE: (1) coordinate the proposed sampling of the Phase 2 properties with EPA's 1½ Mile Reach Removal Action, and (2) propose, for EPA review and approval, a schedule for performing the pre-design sampling. GE proposes to initiate the sampling activities described above within two weeks of EPA's approval of this letter, subject to obtaining the necessary access permission, and to submit a sampling summary letter report within 10 weeks after EPA's approval of this letter, again subject to obtaining access. (Thus, for example, if EPA approval is received on April 21, 2003, GE would provide the summary letter report by June 30, 2003.) In the meantime, the sampling results will be presented in the monthly status reports for the overall GE-Pittsfield/Housatonic River Site. Further, depending on EPA's anticipated schedule for performing response actions within this section of the 1½ Mile Reach, GE is willing to discuss with EPA other arrangements that may expedite EPA's receipt of the most critical sampling data (e.g., identification of priority sampling locations, submittal of preliminary analytical data as received by GE, etc.).

Consistent with the process outlined in the PDI Work Plan, following performance of initial pre-design sampling activities, GE will perform a preliminary assessment of the need for additional remediation to address PCBs in soil at these Phase 2 properties. Further, consistent with Condition No. 6 of EPA's April 9, 2003 letter, based on that assessment and review of the available Appendix IX+3 data, GE will evaluate the need for and scope of additional soil sampling for non-PCB Appendix IX+3 constituents (or for PCBs if necessary) at these properties. That evaluation, together with a proposal and schedule for such sampling (if warranted), will be provided in the above-mentioned summary letter report for EPA review and approval. It is anticipated that any additional sampling (if warranted) will be conducted prior to the initiation of 1½ Mile Reach construction activities on these Phase 2 properties. That summary

letter report will also present a proposed schedule for the submission of the Pre-Design Investigation Report for the Phase 2 properties.

Please contact Dick Gates or me with any questions.

Sincerely,



Andrew T. Silfer, P.E.
GE Project Coordinator

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JJL/csc

Enclosure

cc: Tim Conway, EPA
R. Howell, EPA
Holly Inglis, EPA
Dean Tagliaferro, EPA
Michael Nalipinski, EPA
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Alan Weinberg, MDEP (cover letter only)
Robert Bell, MDEP (cover letter only)
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Dale Young, MA EOE
Mayor Sara Hathaway, City of Pittsfield

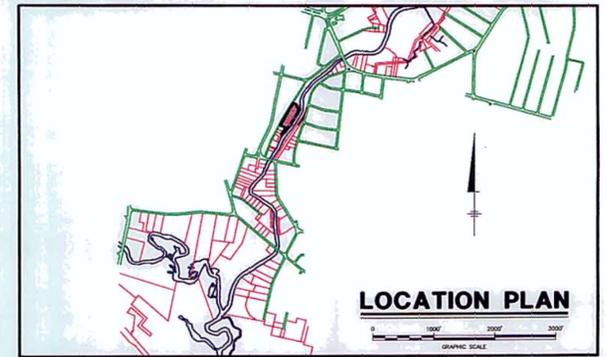
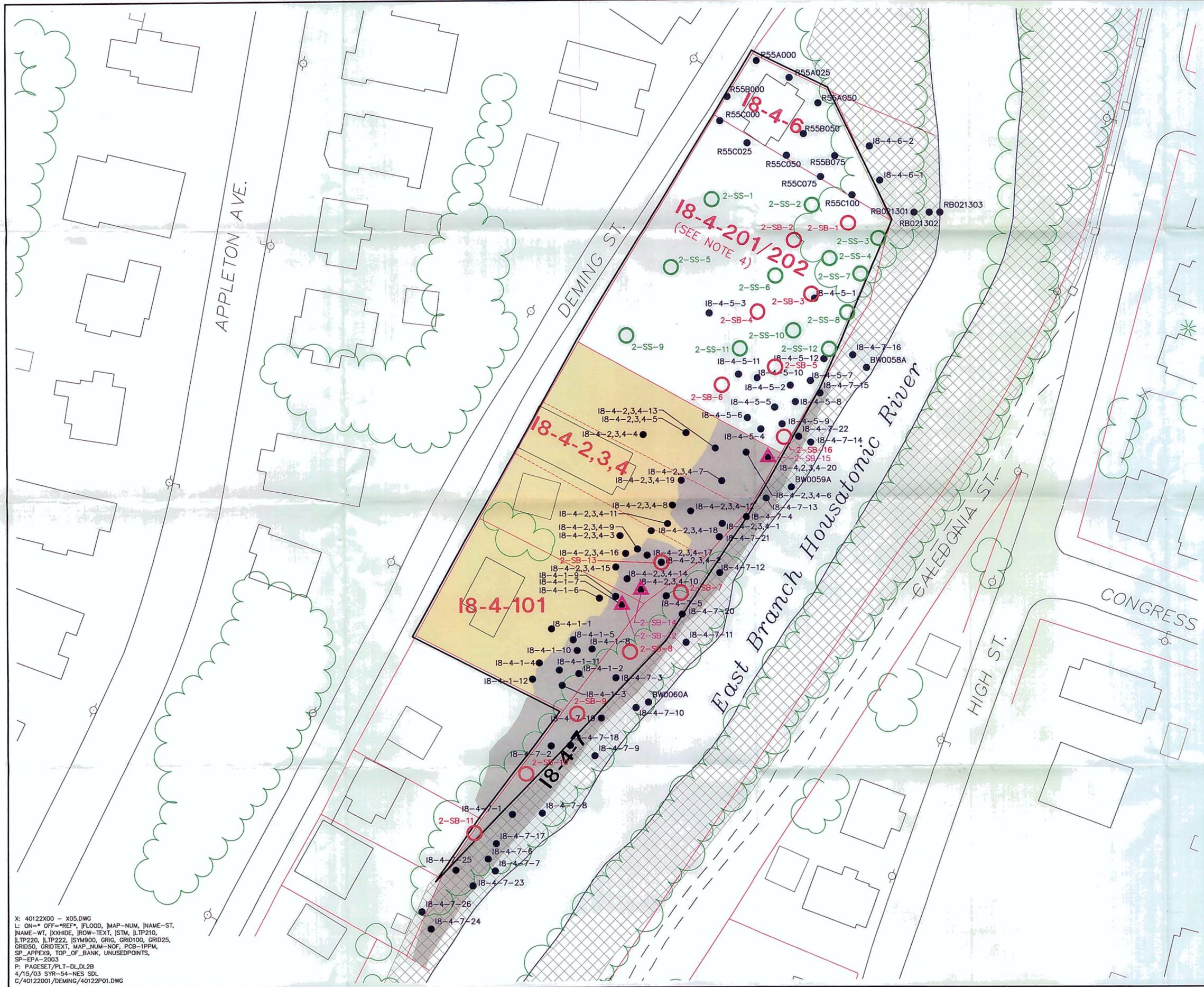
Michael Carroll, GE (cover letter only)
Richard Gates, GE
Rod McLaren, GE (cover letter only)
James Nuss, BBL
James Bieke, Shea & Gardner
Property Owner - Parcel I8-4-2, -3, -4
Property Owner - Parcel I8-4-101
Property Owner - Parcel I8-4-201/202
Property Owner - Parcel I8-4-7
Public Information Repositories
GE Internal Repository

TABLE 1
SUMMARY OF PROPOSED SAMPLES FROM SOIL BORINGS BY DEPTH
GENERAL ELECTRIC COMPANY - PITTSFIELD MASSACHUSETTS
PHASE 2, GROUP 2 FLOODPLAIN PROPERTIES ADJACENT TO THE 1.5 MILE REACH

SAMPLE ID	DEPTH INCREMENT (FEET)																
	0-1	1-3	3-5	4-6	3-6	5-7	6-8	6-10	7-9	8-10	9-11	10-12	11-13	12-14	13-15	14-15	10-15
GROUP 2																	
2-SB-1	X	X	X			X			X								
2-SB-2	X	X	X			X			X								
2-SB-3	X	X	X			X			X								
2-SB-4	X	X	X			X			X								
2-SB-5	X	X	X			X			X								
2-SB-6	X	X	X			X			X								
2-SB-7						X			X								X
2-SB-8						X			X								X
2-SB-9						X			X								X
2-SB-10						X			X								X
2-SB-11						X			X								X
2-SB-12		Y				X			X		X		X		X		
2-SB-13			X			X			X		X		X		X		
2-SB-14						XY			X		X		X		X		
2-SB-15				XY			X			X		X		X		X	
2-SB-16	X	X	X			X			X								

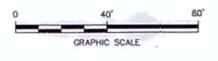
Notes:

1. This table specifies the depth increments from which samples are proposed to be collected from the proposed soil borings. The samples to be collected for PCB analysis will be analyzed iteratively, with the uppermost sample depths analyzed initially, as described in the PDI Work Plan and in the text of the foregoing letter. The samples from deeper increments will be analyzed for PCBs only if the results from the deepest increment initially analyzed show detected PCBs.
2. X - indicates depth interval to be collected for initial or possible future PCB analysis.
3. Y - indicates depth interval to be collected and analyzed for Appendix IX +3 constituents (excluding pesticides and herbicides).



- LEGEND**
- APPROXIMATE PARCEL BOUNDARY
 - FENCELINE
 - 18-4-5 RESIDENTIAL PROPERTY PARCEL ID
 - 18-4-7 NON-RESIDENTIAL PROPERTY PARCEL ID
 - IA-91 EXISTING SOIL BORING LOCATION
 - ▲ 2-SB-12 PROPOSED PCB AND APPENDIX IX+3 SOIL BORING LOCATION
 - 2-SS-2 PROPOSED PCB SURFACE SOIL SAMPLE LOCATION
 - 2-SB-1 PROPOSED PCB SOIL BORING LOCATION
 - BOUNDARY OF FLOODPLAIN PROPERTIES DESIGNATED IN SOW (FOR GROUP 2)
 - ▨ AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
 - ▨ AREA OF PRIOR EXCAVATION (TO DEPTHS RANGING BETWEEN 0.5 AND 4.5 FEET)
 - ▨ PROPERTY PREVIOUSLY REMEDIATED; CLASS A RAO ACHIEVED

- NOTES:**
1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM AERIAL PHOTOGRAPHS DATED APRIL 1990.
 2. SAMPLE LOCATIONS ARE APPROXIMATE.
 3. PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION.
 4. FORMER TAX PARCEL 18-4-5 HAS BEEN DIVIDED INTO TWO PARCELS, 18-4-201 AND 18-4-202, THE CONFIGURATION OF WHICH IS CURRENTLY UNAVAILABLE FROM THE CITY OF PITTSFIELD ASSESSOR'S OFFICE.



GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS
 FLOODPLAIN PROPERTIES ADJACENT TO THE
 1-1/2 MILE REACH
**SUMMARY OF PROPOSED
 SOIL SAMPLING LOCATIONS
 PHASE 2, GROUP 2**

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

FIGURE
4-3

X: 40122X00 - X05.DWG
 L: ON=* OFF=*REF*, [FLOOD, [MAP-NUM, [NAME-ST,
 [NAME-WT, [X-HIDE, [ROW-TEXT, [STM, [LTP210,
 [LTP220, [LTP222, [SYM900, [GRID, [GRID100, [GRID25,
 [GRID50, [GRIDTEXT, [MAP_NUM-NOF, [PCB-1PPM,
 [SP_APPX9, [TOP_OF_BANK, [UNUSEDPOINTS,
 [SP-EPA-2003
 P: PAGESET/PLT-DL2B
 4/15/03 SYR-54-NES SDL
 C:/40122001/DEMING/40122P01.DWG