



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



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Transmitted Via Federal Express

Mr. Richard Cavagnero
Chief, Emergency Planning & Response Branch
Office of Site Remediation and Restoration
U.S. Environmental Protection Agency
One Congress Street, Suite 1100 - HBR
Boston, Massachusetts 02203-2211

Re: Pittsfield/Housatonic River Site
On-Plant Consolidation Areas -
Supplemental Addendum to June 1999 Detailed Work Plan



Dear Mr. Cavagnero:

Enclosed is a revised Supplemental Addendum to the General Electric Company's *Detailed Work Plan for On-Plant Consolidation Areas*. This Supplemental Addendum replaces the Supplemental Addendum that was sent to you on August 25, 1999. It contains updated ARARs tables for the On-Plant Consolidation Areas, which incorporate EPA's comments on prior versions. We would appreciate receiving EPA's formal approval of this Supplemental Addendum.

Sincerely,

Andrew T. Silfer, P.E.
Senior Technical Manager

Enclosure

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TABLE 1

ARARs for Hill 78 Consolidation Area

Regulation	Citation	Requirements	Applicability/Appropriateness	Determination Re Attainment
Federal ARARs				
TSCA Regulations (PCB Remediation Waste)	40 CFR 761.61	Establishes cleanup options for PCB remediation waste, including PCB-contaminated soils. Options include risk-based approval by EPA. Parties seeking risk-based approval must demonstrate that cleanup plan will not pose an unreasonable risk of injury to health or the environment.	Applicable to the extent Hill 78 Consolidation Area contains preexisting materials with PCBs \geq 50 ppm.	Materials subject to this regulation will not be added to Hill 78 Consolidation Area. However, to the extent this area already contains TSCA-regulated wastes, this requirement will be attained based on EPA finding that construction and use of this Consolidation Area per Work Plan will not pose an unreasonable risk of injury to health or the environment.
TSCA Regulations (Decontamination)	40 CFR 761.79	Establishes decontamination standards and procedures for removing PCBs from non-porous surfaces.	Applicable to decontamination of equipment used in consolidation excavation activities.	Will be attained in the event that equipment used in Hill 78 Consolidation Area requires decontamination for PCBs by implementing equipment cleaning procedures in accordance with Section 6.15 of Work Plan.
Clean Water Act NPDES Regulations (Stormwater Discharges)	40 CFR 122.26(c)(ii)(C) 40 CFR 122.44(k) 40 CFR 125.100-.104	Discharges of stormwater associated with construction activities are required to implement best management practices to control pollutants in stormwater discharges during and after construction activities.	Applicable to discharges of stormwater.	Will be attained by implementing erosion and sedimentation controls and stormwater management measures in accordance with Sections 4.7, 5.9, 6.11, and 6.13 of Work Plan.

TABLE 1

ARARs for Hill 78 Consolidation Area

Regulation	Citation	Requirements	Applicability/Appropriateness	Determination Re Attainment
Federal ARARs (cont'd)				
RCRA Regulations Hazardous Waste Management/Disposal Facilities (Landfill Operation)	40 CFR 264.301(g)-(j)	Certain design and operating standards for hazardous waste landfills, including requirements to have run-on and run-off control systems for 25-year storm, manage stormwater control systems, and apply cover if landfill contains particulate matter subject to wind dispersal. These standards do not include liner and leachate collection requirements.	Relevant and appropriate to consolidation of waste to the extent Consolidation Area already contains materials that constitute hazardous waste.	Will be attained.
RCRA Regulations for Hazardous Waste Management/Disposal Facilities (Landfill Closure and Post-Closure Care)	40 CFR 264.111 40 CFR 264.117 40 CFR 264.310(a) 40 CFR 264.310(b)(1) & (5)	Standards for closure and final cover of hazardous waste landfills. Also, requirements for post-closure monitoring and maintenance. Does not include leachate collection and liner requirements.	Relevant and appropriate for capping and post-capping monitoring and maintenance of Consolidation Area to the extent it already contains materials that constitute hazardous waste.	Will be attained. Final cover will meet standards in 264.310(a) for cover design/construction. Post-closure monitoring and maintenance will be conducted in accordance with Sections 8 and 9 of Work Plan and will meet requirements of 264.310(b)(1) & (5).

TABLE 1

ARARs for Hill 78 Consolidation Area

Regulation	Citation	Requirements	Applicability/Appropriateness	Determination Re Attainment
Federal ARARs (cont'd)				
RCRA Regulations for Hazardous Waste Management/Disposal Facilities (Groundwater Monitoring and Protection)	40 CFR 264, Subpart F	Regulated units must monitor groundwater and comply with groundwater protection standards; hazardous constituents that exceed maximum concentration levels or alternative concentration levels must be removed or treated.	Relevant and appropriate to the extent Consolidation Area already contains materials that constitute hazardous waste.	Groundwater monitoring by upgradient and downgradient monitoring wells will be conducted in accordance with Attachment B to August 12, 1999 Addendum (and any additional addenda) to the Work Plan, as approved or conditionally approved by EPA, and in conjunction with the groundwater monitoring program to be described in Statement of Work for Removal Actions Outside the River (SOW). Criteria for further response actions to meet groundwater protection standards will be as set forth in above-referenced Addendum (and any additional addenda), as approved or conditionally approved by EPA, and in the SOW. To the extent these measures do not meet all requirements in the cited regulations, EPA has determined that attainment is not practicable.

TABLE 1

ARARs for Hill 78 Consolidation Area

Regulation	Citation	Requirements	Applicability/Appropriateness	Determination Re Attainment
State ARARs				
Mass. Hazardous Waste Management Facility Regulations (Landfill Operation)	310 CMR 30.622 (5)-(11)	Certain design and operating standards for hazardous waste landfills, including requirements to have run-on and run-off control systems for 100-year storm, manage stormwater control systems, apply cover if landfill contains particulate matter subject to wind dispersal, control migration of harmful emissions, maintain access roads, and use channeling devices to prevent run-off that could interfere with natural drainage of adjacent lands. These standards do not include liner and leachate collection requirements.	Relevant and appropriate to consolidation of waste to the extent Consolidation Area already contains materials that constitute hazardous waste.	Will be attained, except that requirement to have run-on and run-off control systems to control 100-year storm will be attained only to the extent practicable.
Mass. Hazardous Waste Management Facility Regulations (Landfill Closure and Post-Closure Care)	310 CMR 30.582 310 CMR 30.592 310 CMR 30.633(1) 310 CMR 30.633(2)(a) & (e)	Standards for closure and final cover of hazardous waste landfills. Also, requirements for post-closure monitoring and maintenance. Does not include leachate collection and liner requirements.	Relevant and appropriate to the extent Consolidation Area already contains materials that constitute hazardous waste.	Will be attained. Final cover will meet standards in 30.633(1) for cover design/construction. Post-closure monitoring and maintenance will be conducted in accordance with Sections 8 and 9 of Work Plan and will meet requirements of 30.633(2)(a) & (e).

TABLE 1

ARARs for Hill 78 Consolidation Area

Regulation	Citation	Requirements	Applicability/Appropriateness	Determination Re Attainment
State ARARS (cont'd)				
Mass. Hazardous Waste Management Facility Regulations (Groundwater Monitoring and Protection)	310 CMR 30.672	Regulated units must monitor groundwater and comply with groundwater protection standards; hazardous constituents that exceed maximum concentration levels or alternative concentration levels in groundwater must be removed or treated.	Relevant and appropriate to the extent that Consolidation Area already contains materials that constitute hazardous waste.	Groundwater monitoring by upgradient and downgradient monitoring wells will be conducted in accordance with Attachment B to the August 12, 1999 Addendum (and any additional addenda) to the Work Plan, as approved or conditionally approved by EPA, and in conjunction with the groundwater monitoring program to be described in the SOW. Criteria for further response actions to meet groundwater protection standards will be as set forth in above-referenced Addendum (and any additional addenda), as approved or conditionally approved by EPA, and in the SOW. To the extent these measures do not meet all requirements in the cited regulation, EPA has determined that attainment is not practicable.
Mass. Air Pollution Control Requirements	310 CMR 7.09	Prohibition against creating condition of air pollution in connection with dust generating activities.	Applicable to construction and site alteration activities generating dust.	Will be attained by implementing dust control measures and air monitoring in accordance with Sections 6.7 and 6.10 of Work Plan and with the August 12, 1999 Addendum (and any additional addenda) to the Work Plan, as approved or conditionally approved by EPA.

TABLE 2

**ARARs for Building 71 Consolidation Area
and Potential Consolidation Area at New York Ave./Merrill Road**

Regulation	Citation	Requirements	Applicability/Appropriateness	Determination Re Attainment
Federal ARARs				
TSCA Regulations (PCB Remediation Waste)	40 CFR 761.61	Establishes disposal options for PCB remediation waste, including PCB-contaminated soils and sediments. Options include risk-based approval by EPA. Parties seeking risk-based approval must demonstrate that method will not pose an unreasonable risk of injury to health or the environment.	Applicable to disposal of PCB remediation waste, which includes soils and sediments at concentrations ≥ 50 ppm PCBs that were contaminated prior to April 18, 1978 and any PCB waste contaminated after that date where the original source was ≥ 500 ppm beginning on April 18, 1978, or ≥ 50 ppm beginning on July 2, 1979.	Will be attained based on EPA finding that construction and use of these on-plant consolidation areas per Work Plan will not pose an unreasonable risk of injury to health or the environment.
TSCA Regulations (Decontamination)	40 CFR 761.79	Establishes decontamination standards and procedures for removing PCBs from non-porous surfaces.	Applicable to decontamination of equipment used in consolidation activities.	Will be attained by implementing equipment cleaning procedures in accordance with Section 6.15 of Work Plan.
RCRA Regulations for Hazardous Waste Management/Disposal Facilities (Preparedness and Prevention)	40 CFR 264, Subpart C	Various requirements for design and operation of a hazardous waste facility to minimize possibility of fire, explosion, or sudden release.	Relevant and appropriate to consolidation of hazardous waste (if any) in these on-plant consolidation areas.	Will be attained. Operation of on-plant consolidation areas will comply with Section 6.17 of Work Plan and with the Health, Safety, and Contingency Plan that will be prepared by the contractor selected to perform the project.

TABLE 2

**ARARs for Building 71 Consolidation Area
and Potential Consolidation Area at New York Ave./Merrill Road**

Regulation	Citation	Requirements	Applicability/Appropriateness	Determination Re Attainment
Federal ARARs (cont'd)				
RCRA Regulations Hazardous Waste Management/Disposal Facilities (General)	40 CFR 264.13-.19	Various requirements relating to waste analysis, security, inspections, personnel training, precautions to prevent accidental ignition or reaction of wastes, location standards, and construction quality assurance program.	Relevant and appropriate to consolidation of hazardous waste (if any) in these on-plant consolidation areas.	Will be attained. On-plant consolidation areas will be operated in accordance with Section 6.2 and Appendix C of Work Plan and with the Health, Safety, and Contingency Plan that will be prepared by contractor selected to perform the project.
RCRA Regulations Hazardous Waste Management/Disposal Facilities (Landfill Operation)	40 CFR 264.301(g)-(j)	Certain design and operating standards for hazardous waste landfills, including requirements to have run-on and run-off control systems for 25-year storm, manage stormwater control systems, and apply cover if landfill contains particulate matter subject to wind dispersal. These standards do not include liner and leachate collection requirements.	Relevant and appropriate to consolidation of hazardous waste (if any) in these on-plant consolidation areas.	Will be attained.

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ARARs for Building 71 Consolidation Area
and Potential Consolidation Area at New York Ave./Merrill Road

Regulation	Citation	Requirements	Applicability/Appropriateness	Determination Re Attainment
Federal ARARs (cont'd)				
RCRA Regulations for Hazardous Waste Management/Disposal Facilities (Landfill Closure and Post-Closure Care)	40 CFR 264.111 40 CFR 264.117 40 CFR 264.310(a) 40 CFR 264.310(b)(1) & (5)	Standards for closure and final cover of hazardous waste landfills. Also, requirements for post-closure monitoring and maintenance. Does not include leachate collection and liner requirements.	Relevant and appropriate to closure and post-closure care of these on-plant consolidation areas.	Will be attained. Final covers will meet standards in 264.310(a) for cover design/construction. Post-closure monitoring and maintenance will be conducted in accordance with Sections 8 and 9 of Work Plan and will meet requirements of 264.310(b)(1) & (5). Although not required by the ARAR, GE will install a liner and leachate collection system at these consolidation areas as described in the Work Plan.
RCRA Hazardous Waste Regulations (Storage of Hazardous Waste)	40 CFR 264, Subparts I and J 40 CFR 262.34(a)	Subparts I and J of Part 264 identify design, operating, monitoring, closure, and post-closure care requirements for long-term storage of RCRA hazardous waste in containers and tank systems, respectively. However, 262.34(a) allows accumulation of RCRA hazardous wastes for up to 90 days in containers or tanks provided generator complies with requirements of Subparts I and J of Part 265 for containers and tanks.	Relevant and appropriate to storage of leachate collected prior to treatment, to the extent that leachate is a hazardous waste.	Will be attained. Leachate collected may be stored temporarily for 90 days or less in tanker trucks that will meet the standards for up to 90-day accumulation in containers. Alternatively, leachate will be stored in containers or tanks that will meet requirements for long-term storage.

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and Potential Consolidation Area at New York Ave./Merrill Road**

Regulation	Citation	Requirements	Applicability/Appropriateness	Determination Re Attainment
Federal ARARs (cont'd)				
RCRA Regulations for Hazardous Waste Management/Disposal Facilities (Groundwater Monitoring and Protection)	40 CFR 264, Subpart F	Regulated units must monitor groundwater and comply with groundwater protection standards; hazardous constituents that exceed maximum concentration levels or alternative concentration levels in groundwater must be removed or treated.	Relevant and appropriate to consolidation of hazardous waste (if any) in these on-plant consolidation areas.	Groundwater monitoring by upgradient and downgradient monitoring wells will be conducted in accordance with Attachment B to the August 12, 1999 Addendum (and any additional addenda) to the Work Plan, as approved or conditionally approved by EPA, and in conjunction with the groundwater monitoring program to be described in Statement of Work for Removal Actions Outside the River (SOW). Criteria for further response actions to meet groundwater protection standards will be as set forth in above-referenced Addendum (and any additional addenda), as approved or conditionally approved by EPA, and in the SOW. To the extent these measures do not meet all requirements in the cited regulations, EPA has determined that attainment is not practicable.

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Regulation	Citation	Requirements	Applicability/Appropriateness	Determination Re Attainment
Federal ARARs (cont'd)				
Clean Water Act NPDES Regulations (Stormwater Discharges)	40 CFR 122.26(c)(ii)(C) 40 CFR 122.44(k) 40 CFR 125.100-.104	Discharges of stormwater associated with construction activities are required to implement best management practices to control pollutants in stormwater discharges during and after construction activities.	Applicable to discharges of stormwater.	Will be attained by implementing erosion and sedimentation controls and stormwater management measures in accordance with Sections 4.7, 5.9, 6.11, and 6.13 of Work Plan.
State ARARs				
Mass. Hazardous Waste Management Facility Regulations (General)	310 CMR 30.513-30.516	Various requirements relating to waste analysis, security, inspections, and personnel training.	Relevant and appropriate to consolidation of hazardous waste in these on-plant consolidation areas.	Will be attained. On-plant consolidation areas will be operated in accordance with Section 6.2 of Work Plan and the Health, Safety, and Contingency Plan that will be prepared by the contractor selected to perform the project.

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Regulation	Citation	Requirements	Applicability/Appropriateness	Determination Re Attainment
State ARARs (cont'd)				
Mass. Hazardous Waste Management Facility Regulations (Landfill Operation)	310 CMR 30.622 (5)-(11)	Certain design and operating standards for hazardous waste landfills, including requirements to have run-on and run-off control systems for 100-year storm, manage stormwater control systems, apply cover if landfill contains particulate matter subject to wind dispersal, control migration of harmful emissions, maintain access roads, and use channeling devices to prevent run-off that could interfere with natural drainage of adjacent lands. These standards do not include liner and leachate collection requirements.	Relevant and appropriate to consolidation of hazardous waste in these on-plant consolidation areas.	Will be attained, except that requirement to have run-on and run-off control systems to control 100-year storm will be attained only to the extent practicable.
Mass. Hazardous Waste Management Facility Regulations (Ignition/Reaction)	310 CMR 30.560	Various requirements relating to precautions to prevent accidental ignition or reaction of wastes.	Relevant and appropriate to consolidation of hazardous waste in these on-plant consolidation areas.	Will be attained. On-plant consolidation areas will be operated in accordance with the Health, Safety, and Contingency Plan that will be prepared by the contractor selected to perform the project.

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Mass. Hazardous Waste Management Facility Regulations (Landfill Closure and Post-Closure Care)	310 CMR 30.582 310 CMR 30.592 310 CMR 30.633(1) 310 CMR 30.633(2)(a) & (e)	Standards for closure and final cover of hazardous waste landfills. Also, requirements for post-closure monitoring and maintenance. Does not include leachate collection and liner requirements.	Relevant and appropriate to consolidation of hazardous waste in these on-plant consolidation areas.	Will be attained. Final covers will meet standards in 30.633(1) for cover design and construction. Post-closure monitoring and maintenance will be conducted in accordance with Sections 8 and 9 of Work Plan and will meet requirements of 30.633(2)(a) & (e). Although not required by the ARAR, GE will install a liner and leachate collection system at these consolidation areas as described in the Work Plan.

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Mass. Hazardous Waste Management Facility Regulations (Groundwater Monitoring and Protection)	310 CMR 30.672	Regulated units must monitor groundwater and comply with groundwater protection standards; hazardous constituents that exceed maximum concentration levels or alternative concentration levels in groundwater must be removed or treated.	Relevant and appropriate to consolidation of hazardous waste in these on-plant consolidation areas.	Groundwater monitoring by upgradient and downgradient monitoring wells will be conducted in accordance with Attachment B to the August 12, 1999 Addendum (and any additional addenda) to the Work Plan, as approved or conditionally approved by EPA, and in conjunction with the groundwater monitoring program to be described in SOW. Criteria for further response actions to meet groundwater protection standards will be as set forth in above-referenced Addendum (and any additional addenda) to the Work Plan, as approved or conditionally approved by EPA, and in the SOW. To the extent these measures do not meet all requirements in the cited regulation, EPA has determined that attainment is not practicable.

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Regulation	Citation	Requirements	Applicability/Appropriateness	Determination Re Attainment
State ARARs (cont'd)				
Mass. Hazardous Waste Regulations (Storage of Hazardous Waste)	310 CMR 30.680, 30.690 310 CMR 30.340	30.680 and 30.690 identify requirements for long-term storage of RCRA hazardous waste in containers and tank systems, respectively, that are similar to federal RCRA storage requirements identified above. 30.340 allows on-site accumulation of hazardous waste by generator for up to 90 days in containers and tanks provided that generator complies with certain container and tank standards, and is also similar to federal RCRA storage requirements identified above.	Relevant and appropriate to accumulation and storage of leachate prior to treatment, to the extent that leachate is considered a hazardous waste.	See discussion of federal RCRA Hazardous Waste Regulations (Storage of Hazardous Waste) above.
Mass. Air Pollution Control Requirements	310 CMR 7.09	Prohibition against creating condition of air pollution in connection with dust-generating activities.	Applicable to construction and site alteration activities generating dust.	Will be attained by implementing dust control measures and air monitoring in accordance with Sections 6.7 and 6.10 of Work Plan and with the August 12, 1999 Addendum (and any additional addenda) to the Work Plan, as approved or conditionally approved by EPA.