



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
WESTERN REGIONAL OFFICE

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June 1, 2005

Mr. Michael T. Carroll
Remediation Project Manager
GE Corporate Environmental Programs
159 Plastics Avenue
Pittsfield, Massachusetts 01201

Re: Site Number GESD02
Review and Conditional Approval of *Supplemental Scope of Work for Sediment and Riverbank Investigations, Housatonic River-West Branch*

Dear Mr. Carroll:

The Massachusetts Department of Environmental Protection (the Department, DEP) has reviewed the report titled *Supplemental Scope of Work for Sediment and Riverbank Investigations, Housatonic River-West Branch (the Scope of Work)*, dated March 29, 2005. The Scope of Work was prepared by Blasland, Bouck & Lee, Inc. for the General Electric Company (GE).

The West Branch of the Housatonic River (the West Branch) has been investigated by the U.S. Environmental Protection Agency (in 1999) and by the Department (in 2000) to determine the presence of polychlorinated biphenyls (PCBs) in river sediments, riverbank soils, and surface water. Elevated levels of PCBs were detected in riverbank soils and in river sediments adjacent to Dorothy Amos Park (the Park), and approximately mile upstream of the confluence with the East Branch of the Housatonic River. In a letter to GE dated February 25, 2005, the Department directed GE to perform additional response actions to further define the extent of the PCB contamination in riverbank soils and river sediments, to perform surface water sampling, and to gauge and sample the existing groundwater monitoring wells at the Park. The Scope of Work outlines GE's plan to meet these objectives.

The Scope of Work outlines GE's proposed investigation activities for sediment and riverbank soil sampling and proposes a schedule for the submission of the sampling results. The Department approves the Scope of Work with the following conditions:

1. In Section II of the Scope of Work, GE has proposed to collect sediment samples from 20 locations adjacent to the Park, designated as DASED-1 through -20, and at 6 locations around transect 09100, designated as WB09100-SED-1 through -6. Samples at each location will be collected from the 0- to 0.5-foot and 0.5- to 1-foot depth increments and thereafter in 1-foot increments to a depth of 5 feet. The samples from depths down to 3 feet will be submitted for PCB analysis, and the samples from the 3- to 4-foot and 4- to 5-foot depth increments will be held for possible future PCB analysis. GE shall vertically delineate PCBs to a concentration of 1 part per million (ppm) at all of the proposed sediment sampling locations, and additionally, at the following locations:
 - DEP sampling location WSD00450L2, where the PCB concentration in the 1- to 2-foot increment was 1.9 ppm,
 - EPA sampling location SDW22081 where the PCB concentration in the 1.5- to 2.0-foot increment was 1.13 ppm, and;
 - Two locations, one on each side of the river, between transect 00700 and the West Street Bridge.
2. For the riverbank soils adjacent to the Park, GE has proposed to collect samples from seven locations designated as DARB-1 through -7. To identify these sampling locations, GE focused on areas where "existing data indicate that PCB concentrations greater than 10 ppm extend to a depth of at least 3 feet below grade, since GE does not believe that the presence of PCB concentrations less than 10 ppm at depths greater than 3 feet at locations on the lower portion of the riverbank would require remediation." However, GE should delineate the vertical extent of PCBs with concentrations exceeding 2 ppm. Therefore, GE shall vertically delineate PCBs in riverbank soils to a concentration of 2 ppm at the proposed locations, and at the following DEP sampling locations where PCBs were detected in the 1- to 3-foot depth interval at concentrations greater than 2 ppm: WB00150LT3, WB00200LT3, WB00250LT3, WB00325LT3, WB00325LB3, WB00350LB3, WB400LT3, WB00450LT3, and WB00700LT3.
3. The Department has determined that PCBs have been adequately delineated horizontally along the riverbank, except for the area between transect 00700 and the West Street Bridge. GE shall collect riverbank soil samples from two locations in this area, one at approximately one-third of the way up the riverbank from the waterline, and the other just above the waterline.
4. Section II also outlines GE's proposed surface water sampling activities and monitoring well gauging and sampling activities. The Department approves of these activities as proposed.

5. In Section III of the Scope of Work, GE proposes to complete the investigation activities outlined in Section II and submit an Additional Investigation Summary Report, presenting the results of the investigations, within four months of the Department's approval of the Scope of Work. The Department approves of the proposed schedule.

If you have any questions regarding these matters please contact Joanne Flescher at (413) 755-2292.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Susan J. Steenstrup
Project Coordinator, Special Projects
Bureau of Waste Site Cleanup

SJS/JMF

cc: Richard W. Gates, GE
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Housatonic River Initiative
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