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March 30, 2009

Mr. Paul Hare,
General Electric Company
Great Oaks Blvd
Albany, NY 12203

Re: Finalization of the PDI Report

Dear Mr. Hare:

On March 25 and March 30, we spoke about the EPA's March 11, 2009 comments for the finalization of the PDI Report. EPA granted a conditional approval of the Draft PDI Report in a letter dated March 31, 2005 pending modification and also requested a red-line strike out document revision with those comments, which GE supplied in May of 2005.

In question is EPA's March 11, 2009 modification to the reports language relative to the soil column study. As such, EPA required that GE remove the words "at this time" in reference to the reports language that GE and EPA agreed that performance of a soil column study was not necessary at this time. EPA's comment also noted that GE's time to perform such a study had passed and as stated we agreed it was not necessary. Remedial Design proceeded with the 1 mg/kg PCB cleanup level for the Mill Street area of the Site.

As part of the 1998 ROD Remedy to address the future risks associated with ingestion of contaminated groundwater at the Mill Street Area as a result of leaching, the activities included excavation of soils, one foot to bedrock wherever PCBs exceed 1 mg/kg or to a level shown through leaching models and/or soil column testing to be protective to groundwater. EPA incorporated this into the SOW to the July 16, 2001 UAO, as modified. This SOW describes the Pre-Design Phase as consisting of the development of a Pre-Design Work Plan, implementation of the work described in the work plan upon its approval by EPA, submittal of progress reports, and the submittal of a Pre-Design Report describing the results of all pre-design activities. In addition, specifically outlined in the SOW as part of the Pre-Design Work Plan is Section B (iii) Evaluation of Soil Performance Standards which states "If the Respondent chooses to undertake a study to review a site specific PCB cleanup level for those soils outlined in Section X of the ROD that require cleanup to prevent the future leaching of contamination into the groundwater in excess of the PCB MCL (0.5 ug/l), then the Respondent shall discuss and identify what steps they shall take to review such performance standards, and upon EPA approval or modification, after reasonable opportunity for review and comment by NHDES, shall undertake such study. The Respondent shall undertake and complete such studies during the

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time frame of the Pre-Design Phase and submit such findings and recommendations to the EPA and NHDES in the Pre-Design Report, for review, approval or modification.”

In accordance with the UAO, GE's opportunity to undertake such a study ended at the Pre-Design Phase. EPA's April 19, 2005 letter states "EPA understands that GE does not wish to proceed forward with the soil column study. Therefore this action, which was included in the Pre-Design Work Plan, will not be addressed further and therefore there are no outstanding issues relative to finalizing the Pre-Design Report." EPA's comment to remove the language "at this time" relates to the ending of the Pre-Design Phase. There are no other times under the UAO that EPA will entertain a soil column study for the Mill Street soils.

GE may elect to state that a soil column study was discussed, but not conducted during the Pre-Design Investigations. EPA and GE communication relative to certain risk management decisions at the Site have been on-going and will continue to be discussed throughout the Remedial Design and Remedial Action, as needed.

As discussed, GE intends to submit the final PDI Report to the EPA on April 2, 2009, in accordance with the requirements of the UAO.

Sincerely,



Cheryl L. Sprague

Remedial Project Manager

Office of Site Remediation and Restoration

Cc: Mike Jasinski
Ruthann Sherman