



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Federal Express

September 13, 2006

Ms. Sharon Hayes
United States Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, MA 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
30s Complex (GECD120)
Demolition and Disposition Activities – Building 32 Substation Concrete Floor Slab**

Dear Ms. Hayes:

The General Electric Company (GE) has prepared this letter to (a) identify its plans to demolish the concrete slab-on-grade floor at the Building 32 Substation to 1 foot below grade and (b) seek the U.S. Environmental Protection Agency's (EPA's) approval of GE's plans for the consolidation of the concrete debris resulting from that demolition activity. The Building 32 Substation is located within the former 30s Complex Removal Action Area (RAA) at GE's Pittsfield facility. On August 10, 2006, GE submitted a letter titled *Demolition and Disposition Activities – Building 32 Substation* addressing the demolition and disposition of the above-grade building materials of the Building 32 Substation. In a letter dated August 24, 2006, EPA approved GE's proposal to consolidate those building demolition materials at GE's Hill 78 On-Plant Consolidation Area (OPCA). However, based on subsequent discussions with the Pittsfield Economic Development Authority (PEDA), owner of the 30s Complex property, the scope of the demolition activities has been expanded to include the removal of the existing concrete slab-on-grade. As such, this letter presents a general description of GE's anticipated additional demolition activities at the Building 32 Substation for informational purposes, and presents, for EPA approval, GE's proposed plans for the consolidation of the additional building demolition debris at GE's Hill 78 OPCA.

Pre-Demolition Characterization Activities

GE performed additional pre-demolition characterization activities for the Building 32 Substation on August 30, 2006. As requested by EPA, the August 2006 characterization activities involved the collection of two core samples from the concrete floor slab for analysis of polychlorinated biphenyls (PCBs), and were performed consistent with the procedures summarized in the document titled *Protocols for Building Demolition and Associated Characterization Activities* (Demolition Protocols), the most recent version of which was submitted to EPA in July 2003 (as Exhibit A-1 to Attachment A to GE's *Project Operations Plan* [POP], incorporating modifications previously approved by EPA). The locations of the samples are shown on Figure 1.

The analytical results of the August 2006 sampling activities are summarized in Table 1. A review of the data indicates that PCBs were detected at total concentrations of 0.52 and 0.56 parts per million (ppm) in the two building material samples. Based on these results, as well as the previously collected Toxicity Characteristic Leaching Procedure (TCLP) data collected from this building (which were presented in [GE's August 10, 2006 letter](#)), the additional demolition debris that will be generated from the Building 32 Substation concrete floor slab is considered suitable for consolidation at GE's Hill 78 OPCA. GE's proposal concerning disposition of materials in the Hill 78 OPCA is presented below.

Demolition of the Building 32 Substation Concrete Floor Slab

Following completion of pre-demolition activities (e.g., asbestos abatement, equipment and liquids removal, removal of loose lead-based paint, etc.), the concrete floor slab will be demolished to 1 foot below grade using conventional construction equipment and practices, with appropriate dust control measures performed during the demolition activities. The remaining void will be backfilled with clean fill to match surrounding grade, and the final surface will be restored with topsoil and seed to establish vegetative growth.

Building Demolition Material Disposition

Based on the attached characterization information (Table 1), the additional demolition material from the Building 32 Substation concrete floor slab meets the applicable PCB requirements of the Consent Decree (CD) and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW) for consolidation at the Hill 78 OPCA (i.e., total PCB concentrations below 50 ppm). In addition, the TCLP data from a previous composite sample of wall materials from this building (presented in GE's August 10, 2006 letter) showed non-detect concentrations or concentrations well below EPA's TCLP regulatory limits, thus indicating that the materials from this building will also meet the requirement of the CD and SOW that materials to be placed in the Hill 78 OPCA not constitute hazardous waste under the Resource Conservation and Recovery Act. In these circumstances, GE proposes to consolidate the demolition debris from the Building 32 Substation concrete floor slab (approximately 100 cubic yards) at the Hill 78 OPCA.

Consolidation of the demolition debris at the Hill 78 OPCA will be conducted consistent with the provisions contained in the CD and SOW regarding use of the Hill 78 OPCA, as well as the Demolition Protocols. Specifically, GE will not consolidate at the Hill 78 OPCA free liquids, intact drums or other equipment that contains liquid PCBs, or asbestos-containing material required by applicable law to be removed from structures prior to demolition. Materials deemed unsuitable for placement at the Hill 78 OPCA will be transported to an appropriate off-site disposal facility. The transport, handling, placement, and grading of the concrete debris at the Hill 78 OPCA will be performed in accordance with all applicable OPCA requirements, including GE's 2006 *Addendum to OPCA Work Plan*.

Based on the above, GE requests EPA's approval for GE's plan to consolidate the demolition debris from the Building 32 Substation concrete floor slab at the Hill 78 OPCA. Following EPA's approval, GE will finalize its project planning and proceed with the demolition and subsequent site restoration of the Building 32 Substation.

If EPA has any comments or questions concerning this letter, please contact me at your earliest convenience.

Sincerely,



Michael T. Carroll
Manager, Pittsfield Remediation Programs

GDR/cmb
Attachments

cc: Dean Tagliaferro, EPA
Tim Conway, EPA
John Kilborn, EPA
Holly Inglis, EPA
Rose Howell, EPA
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP
Jane Rothchild, MDEP
Linda Palmieri, Weston (2 copies)

Thomas Hickey, Director, PEDDA
Mayor James Ruberto, City of Pittsfield
Pittsfield Department of Health
Jeffrey Bernstein, Bernstein, Cushner & Kimmell
Teresa Bowers, Gradient
Stephen Wilson, CHA
Andrew Silber, GE
Roderic McLaren, GE
James Nuss, BBL
James Bieke, Goodwin Procter
Larry Kirsch, Goodwin Procter
Samuel Gutter, Sidley Austin
Public Information Repositories
GE Internal Repository

Table

**TABLE 1
PCB DATA RECEIVED DURING SEPTEMBER 2006**

**BUILDING 32 SUBSTATION SAMPLING
20s, 30s, 40s COMPLEX
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in parts per million, ppm)**

Sample ID	Date Collected	Aroclor-1016	Aroclor-1221	Aroclor-1232	Aroclor-1242	Aroclor-1248	Aroclor-1254	Aroclor-1260	Total PCBs
SUB32-CONC-NW-1	8/30/2006	ND(0.032)	ND(0.032)	ND(0.032)	ND(0.032)	ND(0.032)	ND(0.032)	0.56	0.56
SUB32-CONC-SE-1	8/30/2006	ND(0.032)	ND(0.032)	ND(0.032)	ND(0.032)	ND(0.032)	ND(0.032)	0.52	0.52

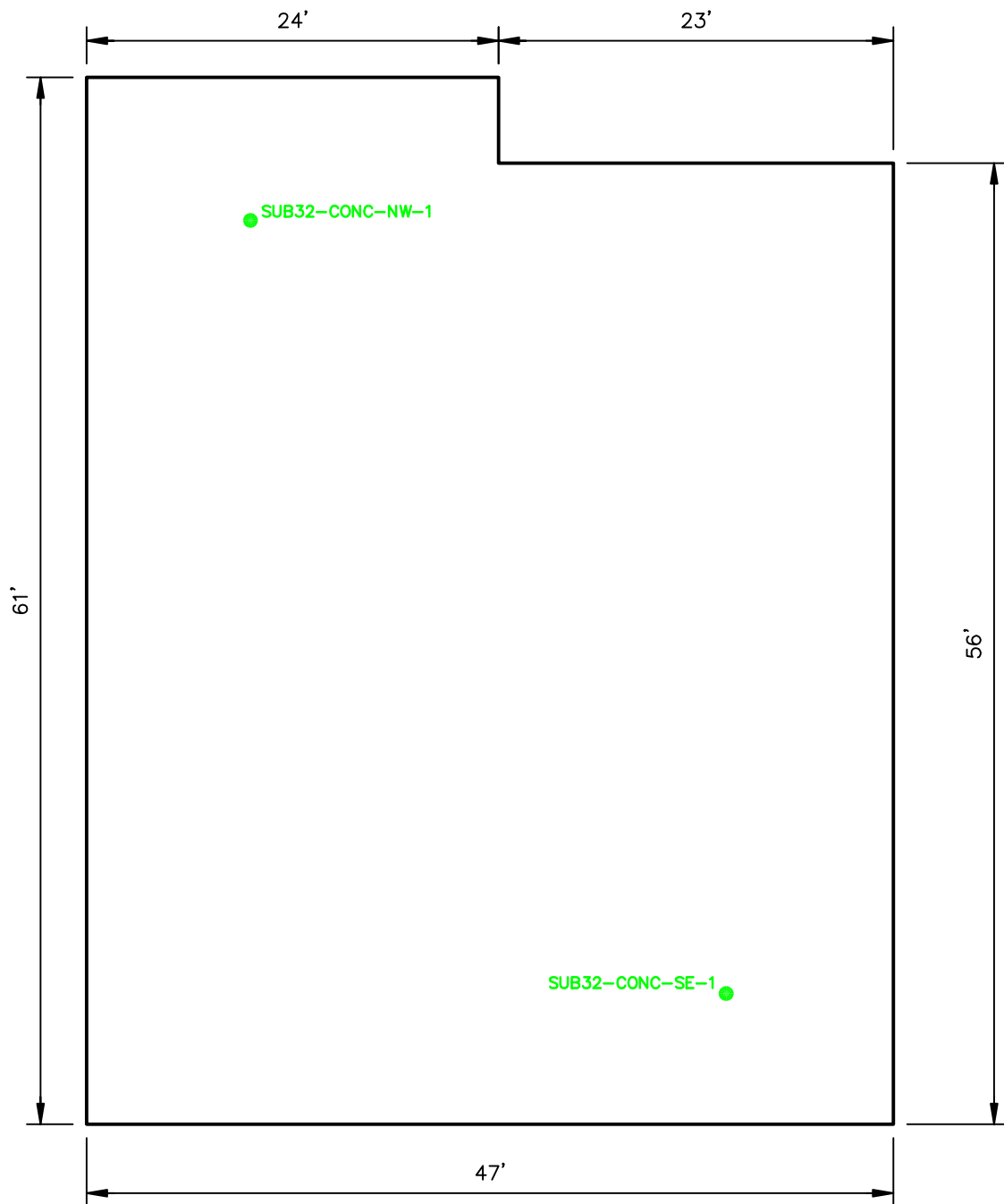
Notes:

1. Samples were collected by BBL, an ARCADIS company (BBL), and submitted to SGS Environmental Services, Inc. for analysis of PCBs.
2. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.

Figure

S:\R-65-PGL_LJP_LAF_LAYER: ON=*, OFF=*REF*
G:\GE_ACTIVE\N\20931001\20931002.dwg SAVED: 9/13/2006 1:03 PM LAYOUT: Layout1 PAGESETUP: AP-PDF PENTABLE: PLTFULL.CTB PRINTED: 9/13/2006 1:03 PM BY: LFORAKER

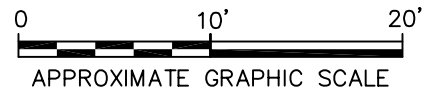
PROJECT NAME: ---
XREFS: IMAGES:



SUB32-CONC-NW-1 ●

LEGEND:

PCB SAMPLE LOCATION FROM
CONCRETE SLAB-ON-GRADE FLOOR



NOTE:

1. THE GENERAL LAYOUT FOR THIS FIGURE WAS OBTAINED FROM A SKETCH PREPARED BY BBL, AN ARCADIS COMPANY, TITLED BUILDING 32 SUBSTATION SAMPLING, AS WELL AS HISTORICAL DRAWINGS PROVIDED BY GENERAL ELECTRIC COMPANY.
2. LOCATIONS ARE APPROXIMATE.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
**BUILDING 32 SUBSTATION DEMOLITION
AND SITE RESTORATION PROGRAM**
**BUILDING 32 SUBSTATION - AUGUST
2006 BUILDING MATERIALS SAMPLING
PROGRAM**



FIGURE
1