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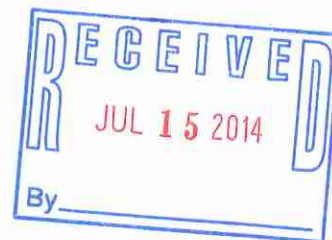
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Affirmative Action/Equal Opportunity Employer

July 11, 2014

Mr. Steven Meier
General Electric Company
319 Great Oaks Blvd
Albany, NY 12203

David Kooris
City of Bridgeport
Office of Planning and Economic Development
999 Broad Street
Bridgeport, CT 06604



RE: Remedial Action Plan – School Parcel
General Electric Company
379 Bond Street, Bridgeport, Connecticut
REM ID# 7426

Dear Mr. Meier and Mr. Kooris:

The Remediation Division of the Bureau of Water Protection and Land Reuse (the Department) has reviewed the report titled Remedial Action Plan (RAP) prepared by Leggette, Brashears & Graham Inc. (LBG) on behalf of General Electric Company (GE). The RAP was received on April 25, 2014 with a Stewardship Permit Application submitted with the City of Bridgeport, and in accordance with 22a-449(c)-05(h) of the Regulations of Connecticut State Agencies (RSCA).

The RAP included the following reports attached as Appendices:

- Appendix I: Target Due Diligence Testing, Triton Environmental, Inc. October 2013
- Appendix II: Site History
- Appendix III: Completed RDEC and GB PMC Soil Remedial Actions
- Appendix IV: Interim Remedial Action Report: Courtyard 32W Excavation
- Appendix V: Interim Remedial Action Report: PCB Removals

The Department and representatives of GE and the City of Bridgeport met on June 18, 2014 for a technical meeting to discuss the Department's comments and questions that resulted from the review of the Stewardship Permit and accompanying reports.

The following are summaries of the comments, questions, and technical discussions regarding the RAP and applicable appendices from the technical meeting on June 18, 2014:

Remedial Action Plan

1. In **Section 3.3.5 Metals and Cyanide**, LBG states that arsenic was identified at concentrations greater than the Residential Direct Exposure Criteria (RDEC) on the elevated southeastern portion of the site; however the 95% Upper Confidence Level (UCL) arithmetic mean was less than the RDEC and therefore no remediation is required.
 - Submit a detailed explanation which describes how the 95% UCL was calculated for this area. Refer to the Guidance for Calculating the 95% Upper Confidence Level for Demonstrating Compliance with the Remediation Standard Regulations posted at the following link:
http://www.ct.gov/deep/lib/deep/site_clean_up/remediation_regulations/95ucl_guidance.pdf
2. The **Summaries of Analytical Results Figures (Figures 6-10)** depict the soil sample locations and results for each constituent prior to remediation by excavation. It would be useful to provide figures that illustrate post-remediation conditions.
 - To illustrate the post-remediation conditions at the property, provide revised Figures 6-10 that include the excavation limits of remediation that has already occurred.
3. **Approximate Extent of Soils Exceeding the GB PMC (Figure 12)** depicts the areas where soil on the property currently contains lead in excess of the GB PMC; however, it does not illustrate the results of the investigation, remediation completed or pending remediation dimensions.
 - Provide a revised Figure 12 that includes: (1) the sample locations and corresponding results from the investigation(s) in the areas proposed for excavations; and (2) the proposed excavation limits and previous excavation limits (if applicable) in areas proposed for lead-impacted soil removal.
4. **Section 6.2 Sequence of Activities** includes "Remove remaining concrete, piping, and asphalt" as a bulleted item. What is the status of the remaining concrete?

Meeting Outcome: The concrete has been sampled and analyzed for the appropriate constituents of concern. No results were reported above criteria. GE/City of Bridgeport will provide the Department with the concrete sample results and a letter indicating of their intent to reuse the concrete as clean fill. A letter of intent and analytical results will suffice. No approval is necessary for reuse of concrete as clean fill. The Department will review the results and issue a letter of concurrence.

Appendix III: Completed RDEC and GB PMC Soil Remedial Actions

1. **Summary of Areas of Concern (Table 1)** has not been updated since the Phase I-III Environmental Site Assessment, March 2013.
 - Provide an updated Summary of AOCs Table that reflects the results of investigations, remedial actions completed, remedial actions needed or no further action conclusions for each AOC.
2. The blue lines on sample results tables on the **Excavation Completed Figures** are purposed to denote the sample location relative to the seasonal high water table.
 - Provide clarification that the blue line immediately below a sample result does not indicate that the sample was collected at the groundwater interface, but rather that the sample was collected above the groundwater table.
 - Provide a groundwater elevation summary for reference.
3. Soil sample results analyzed by the Synthetic Precipitation Leaching Procedure (SPLP) method can be used to trump Total data results in respect to demonstrating compliance with the PMC. In Appendix III, the SPLP results are presented in a separate table from the Total results. If a sample result meets GB PMC based on the SPLP results, the Total data tables indicate that sample meets the GB PMC even though the Total numerical result exceeds criteria.
 - Provide clarification on the Total tables that indicate which samples meet criteria based on the SPLP results.
4. The GB PMC does not apply to soil samples collected from beneath the seasonal high water table. In Appendix III, the data tables present soil samples collected from below the seasonal high water table as in compliance with the GB PMC even though the numerical result does not meet criteria.
 - Provide clarification on the tables that indicate which samples meet criteria because the sample was collected from beneath the water table.
5. In **Appendix III Section 3.0** AOC-16 is mislabeled in as AOC-15.
 - Please revise.
6. In **Appendix III Section 12.0** AOC-27 is mislabeled in as AOC-26.
 - Please revise.

7. Lead (SPLP) was detected above the GB PMC at 1.91 mg/kg in sample B29L-B-2 (0.8-1.7) in the Phase I-III Environmental Site Assessment (ESA) (App XXII AOC-16 Table 7). According to Appendix III Section 3.0 (PMC6) and Figure 4, this area was excavated to a depth of seven feet below grade. If lead was reported above the GB PMC at a depth of less than two feet below grade, why was the final excavation so deep?

Meeting Outcome: GE opted to over-excavate in this area to the groundwater table rather than collect deeper samples to vertically delineate the release area prior to remediation. Excavating to the groundwater table is a commonly used and acceptable method to meet the GB PMC. No confirmation samples are necessary since the GB PMC applies only to soil located above the seasonal high groundwater table.

8. Benzo(a)anthracene exceeded the GB PMC of 0.0006 mg/l in soil sample B33W-B-7 (0.6-2) with a result of 0.00071 mg/l in the Phase I-III ESA (Appendix XXII Table 8 SPLP SVOCs). The result was not highlighted on Table 8 or the Summary of SVOC Results Table 5. It was not addressed in Appendix III or proposed for remediation in the RAP. Please explain why remediation was not proposed at this location.

Meeting Outcome: The total concentration for Benzo(a)anthracene was non-detect in this sample; however, the SPLP result exceeded the GB PMC, and therefore, must be addressed.

- Provide a Data Quality Assessment and Usability Evaluation of the laboratory data to demonstrate that the SPLP result was not reliable, or a revised plan for further investigation, or propose remediation.
9. ETPH exceeded the Residential Direct Exposure Criteria (RDEC) in sample B33E-B-1 (0.5-0.9) with a concentration of 1,200 mg/kg in the Phase I-III ESA (App XXII Figure 1). According to Appendix III Section 9.0 (RDEC 3), this area was excavated and the RDEC soil was removed. However, adjacent sample B33W-B-8 (0.5-2) also contained ETPH at a concentration of 1,200 mg/kg but this was not remediated. If the final remediation plan is to cover the soils that exceed the RDEC with clean fill, pavement or the building footprint, why was this remediated?

Meeting Outcome: B33E-B-1 was located in an elevated area that is not slated to receive additional fill for development purposes and would not have met the conditions necessary for the inaccessible soil requirements. B33W-B-8 is located in a lower-lying area and will receive either two or four feet of fill or will be beneath the building footprint and deemed inaccessible. This explanation for the RDEC remediation is reasonable.

- Provide clarification for this any other remediation that occurred because of detections within an elevated area.

Appendix V: Interim Remedial Action Report for PCB Removal Areas

1. At Location #1 (Former Courtyard 32) a sidewall sample was not collected from the building side of excavation A that was below criteria (CY32-B-19(0.5-2) 1.1 mg/kg) and a sidewall sample was not collected from the building side of excavation B to delineate CY32-B-8 (0.5-2) 2.9 mg/kg. Please provide an explanation for the omission of confirmation samples from the along the building in these excavations.

Meeting Outcome: *The building slab depth was at four feet below grade and the excavation extended laterally to the slab. Given the relatively low concentrations of PCBs reported and the delineated depth of samples in respect to the building slab depth, no additional samples are necessary here.*

2. At Location #2 (Former Courtyard 30W) PCBs were reported in UST70-B-2 from 8.9 mg/kg (4.5-6) to 620 mg/kg (0.5-2) and in UST70-B-1 (0.5-2) 29 mg/kg and (2-4) 13 mg/kg. Sidewall samples were not collected along building side of the greater-than-40 mg/kg portion of excavation to delineate the above detections. Please provide an explanation for the omission of confirmation samples along the building in this excavation.

Meeting Outcome: *The building slab depth was at four feet below grade and the excavation extended laterally to the slab. Because of the higher concentrations of PCBs detected and the depth of detections in respect to the depth of the building slab, additional confirmation soil samples are required to fully demonstrate that remediation is complete in this location.*

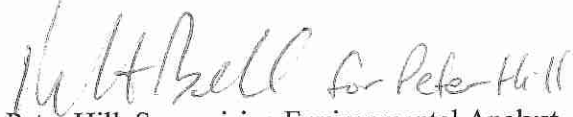
- Please collect confirmation samples in this area from grade to six feet below grade to correspond with the depths of PCB detections.
- Results should be submitted with the revised RAP.

The Department had no questions or comments on the groundwater results or Courtyard 32W Remediation.

The next deliverable due from you is a revised RAP that addresses the comments above and provides the additional sampling data and technical analysis, and additional remediation if results warrant.

If you have any questions pertaining to this matter, please contact Amanda Killeen of my staff at (860) 424-3351.

Sincerely,

A handwritten signature in cursive script, appearing to read "Peter Hill", written in dark ink.

Peter Hill, Supervising Environmental Analyst
Remediation Division
Bureau of Water Protection and Land Reuse
Department of Energy and Environmental Protection

PH:ark

Cc: Miranda Henning, Environ, 136 Commercial Street, Suite 402, Portland, ME 04101
Michael Manolakas, LBG, Inc., 4 Research Drive, Suite 301, Shelton, CT 06484
Pamela Elkow, Robinson & Cole, 1055 Washington Blvd, 9th Floor, Stamford, CT 06901-2249
Marian Whiteman, GE, 3135 Easton Turnpike, MCWIL, Fairfield, CT 06828
Kim Tisa, USEPA
Gary Trombly, DEEP
Chris Sullivan, DEEP