



**United States Environmental Protection Agency
One Congress Street, Suite 1100
Boston, MA 02114-2023**

August 20, 2008

Mr. Richard W. Gates, Remediation Project Manager
Corporate Environmental Programs
General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's June 20, 2008, *Hill 78 Area-Remainder Final RD/RA Work Plan*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's June 20, 2008, *Hill 78 Area-Remainder Final RD/RA Work Plan* (the "Work Plan"). This submittal is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the Work Plan, subject to the following conditions:

1. Section 5.2.2 of the Work Plan, Utility-Related PCB Information, indicates that GE performed an evaluation of the corridor associated with the re-routed storm and sanitary sewer lines and that the new pipeline corridor is shown on revised Figure B-33 and the PCB data collected from within the corridor are included on revised Table B-21. The revised Figure B-33 and Table B-21 included in Attachment A of the Work Plan do not include all of the soil sample locations and analytical results for 0 to 15 foot depth intervals within the new pipeline corridor. Specifically, sample location OPCA-SB-20, for which PCB results exist, is not included. GE shall revise Figure B-33 and Table B-21 to include all soil sample locations and analytical results used for evaluating utility corridors for PCBs.
2. Figure B-33 also includes the boundaries of the Hill 78 and Building 71 OPCAs and associated stormwater basins. The OPCA boundaries as depicted in Figure B-33 do not coincide with the boundaries depicted in Figure 1 of GE's July 27, 2007, *Hill 78 Area-Remainder Third Supplemental Data Letter*, Figure 3 of GE's April 13, 2006, *Addendum to OPCA Work Plan* or with the boundaries depicted in the Fourth Modification of the Consent Decree. GE shall revise Figure B-33 to include the

correct OPCA boundaries and determine if any revised boundaries impact the soil evaluations for the RAA.

3. GE shall include provisions in the final technical drawings, bid documents and Supplemental Information Package (SIP) for delineating and protecting the previously excavated polygon located adjacent to the realigned storm and sewer pipeline and between the two polygons to be excavated, during the remediation activities described in the Work Plan.
4. GE shall restore the areas impacted by the storm and sanitary sewer pipeline realignment activities prior to, or in conjunction with, the backfilling and restoration activities associated with the remediation described in the Work Plan. GE shall incorporate a restoration plan into the Post-Removal Site Control Plan for the Hill 78-Remainder RAA which illustrates the locations of the new swales and other restoration components for the sewer pipeline realignment area, and documents the inspection activities to be performed.

Until restoration is complete, GE shall top soil and seed the area at the southern end of the realigned sewer that has not been addressed since completion of the construction of the sewer, or shall implement interim measures to address erosion occurring at the southern end of the realigned sewer. These measures shall include, but are not limited to, the installation of silt fences and hay bales along the mid-slope of the exposed area, along both sides of the existing drainage swale, and surrounding the edge of the swale at the opening of the storm sewer.

5. In Section 8.6 of the Work Plan, Perimeter Air Monitoring, GE indicates that perimeter PCB air monitoring activities will be conducted on a weekly basis once the perimeter PCB air monitoring currently being performed at the Hill 78 OPCA ceases. To clarify, GE shall conduct perimeter PCB air monitoring activities weekly during the remediation activities described in the Work Plan, regardless of any OPCA placement or PCB air monitoring activities. OPCA-related air monitoring conducted during this time may be utilized to satisfy this requirement, along with the additional air monitoring specified in condition 6 below.
6. In addition to the existing air monitoring stations located at the OPCAs and within the Hill 78-Area Remainder RAA, GE shall also locate one additional air monitoring device between the areas to be excavated and Merrill Road and one between the areas to be excavated and New York Avenue. GE shall conduct PCB air and particulate monitoring at these locations, as well as at least the OPCA West, Northwest, and North PCB air monitoring stations locations, during excavation and restoration activities.
7. GE shall revise Section 1.2 of the Post-Removal Site Control Plan to indicate that the portion of the paved access road along the perimeter of the OPCAs previously identified as being subject to inspection and maintenance, will be inspected as an element of the periodic OPCA-related inspections, in accordance with EPA's October

18, 2007, Conditional Approval of GE's July 27, 2007, *Hill 78 Area-Remainder Third Supplemental Data Letter*.

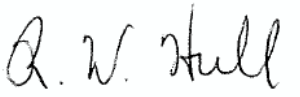
Within 30 days of the date of this letter, GE shall submit an Addendum to the Work Plan that addresses the conditions above.

GE shall prepare a Request for Proposal to potential Remediation Contractors, receive and review bids, and select a Remediation Contractor within 45 days of the date of this letter. Within 30 days after selection of a Remediation Contractor, GE shall submit a SIP, including a schedule for remediation and restoration activities, to EPA for review and approval.

EPA reserves all of its rights under the CD, including but not limited to, the right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the CD.

If you have any questions, please contact me at (617) 918-1882.

Sincerely,



Richard W. Hull
GE Facility Project Manager

cc:

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