



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

May 31, 2007

Ms. Susan Svirsky
U.S. Environmental Protection Agency
c/o Weston Solutions, Inc.
10 Lyman Street
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
Rest of River (GECD850)
Corrective Measures Study Proposal – Addendum to Supplement**

Dear Ms. Svirsky:

On May 11, 2007, the General Electric Company (GE) submitted a Supplement to its Corrective Measures Study (CMS) Proposal for the Rest of River to the U.S. Environmental Protection Agency (EPA). That Supplement was submitted in response to EPA's letter of April 13, 2007, "conditionally approving" the CMS Proposal and directing GE to submit a Supplement to the CMS Proposal addressing a number of the conditions and directives in EPA's letter.

At the time of that Supplement, GE had invoked dispute resolution under the Reissued RCRA Corrective Action Permit with respect to certain conditions and directives in EPA's conditional approval letter. That dispute affected involved one of the items that EPA had required GE to address in the Supplement – namely, a revised Table 5-1 summarizing the sediment remediation alternatives. As a result, GE stated in the Supplement that it would provide that remaining information to EPA within 10 days of resolution of GE's dispute.

In an exchange of letters from EPA (dated May 22, 2007) and GE (dated May 23, 2007), EPA made revisions to certain of the disputed conditions, and GE agreed that it would not proceed further at this time with the dispute resolution proceeding, while reserving its future rights regarding these or any of the other conditions in EPA's April 13, 2007 letter. Accordingly, GE is submitting herewith a revised Table 5-1 to the CMS Proposal. This revised table reflects EPA's comments in General Conditions 1, 17, 21, and 23 of its April 13, 2007 letter, with the revisions to General Condition 21 set forth in the Attachment to EPA's May 22, 2007 letter.

Please let me know if you have any questions about the enclosed revised table or would like to discuss any issues.

Very truly yours,



Andrew T. Silfer, P.E.
GE Project Coordinator

Enclosure

cc: Dean Tagliaferro, EPA
Timothy Conway, EPA
John Kilborn, EPA
Robert Cianciarulo, EPA
Holly Inglis, EPA
Rose Howell, EPA (cover letter)
Richard McGrath, Sleeman Hanley & DiNitto
Scott Campbell, Weston Solutions
Joel Lindsay, Weston Solutions
Edward Garland, HydroQual
Michael Palermo, Mike Palermo Consulting
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP
Jane Rothchild, MDEP
Thomas Angus, MDEP
Dale Young, MA EOE
Susan Peterson, CDEP
Michael Carroll, GE
Jane Gardner, GE
Roderic McLaren, GE
Kevin Mooney, GE
Stuart Messur, ARCADIS BBL
Mark Graveling, ARCADIS BBL
James Rhea, QEA
Kevin Russell, QEA
James Bieke, Goodwin Procter
Samuel Gutter, Sidley Austin
Donna Voorhees, Menzie-Cura
John Lortie, Woodlot Alternatives
Gary Lawrence, EVS Environment
Mark Velleux, HydroQual
Public Information Repositories
GE Internal Repository

**General Electric Company
Housatonic River – Rest of River: CMS Proposal**

Table 5-1 – Summary of Corrective Measure Alternatives for In-River Sediments

Alt.	Reach 5A	Reach 5B	Reach 5 Erodible Banks	Reach 5C	Reach 5 Backwaters	Reach 6 (Woods Pond)	Reach 7 Impoundments	Reach 7 Channel	Reach 8 (Rising Pond)	Reaches 9 - 16
SED 1	No action	No action	No action	No action	No action	No action	No action	No action	No action	No action
SED 2	MNR	MNR	MNR	MNR	MNR	MNR	MNR	MNR	MNR	MNR
SED 3	2' removal w/ capping	MNR	Removal/ stabilization	Combination of TLC and MNR	MNR	TLC	MNR	MNR	MNR	MNR
SED 4	2' removal w/ capping	Combination of 2' removal w/ capping and TLC (dep. on depth & velocity)	Removal/ stabilization	Combination of TLC (in shallow & depositional areas) and capping (in deeper areas)	Combination of TLC and MNR	Combination of 1.5' removal w/ capping in shallow areas and TLC in deep area	MNR	MNR	MNR	MNR
SED 5	2' removal w/ capping	2' removal w/ capping	Removal/ stabilization	Combination of 2' removal w/ capping (in shallow areas) and capping (in deeper areas)	Combination of TLC and MNR	Combination of 1.5' removal w/ capping in shallow areas and capping in deep area	MNR	MNR	TLC	MNR
SED 6	2' removal w/ capping	2' removal w/ capping	Removal/ stabilization	2' removal w/ capping	Removal of sediments >50 mg/kg in top 1' (w/ capping/backfill); TLC for remainder >1 mg/kg	Combination of 1.5' removal w/ capping in shallow areas and capping in deep area	TLC	MNR	Combination of TLC in shallow areas and capping in deep areas	MNR
SED 7	3-3.5' removal w/ backfill	2.5' removal w/ backfill	Removal/ stabilization	2' removal w/ capping	Removal of sediments >10 mg/kg in top 1' (w/ capping/backfill); TLC for remainder >1 mg/kg	Combination of 2.5' removal w/ capping in shallow areas and capping in deep area	Removal of higher PCB levels (e.g., >3 mg/kg) in top 1.5' (w/ capping/backfill); TLC for remainder >1 mg/kg	MNR	Comb. of removal of higher PCB levels (e.g., >3 mg/kg) in top 1.5' (w/ capping/backfill) & TLC in shallow areas and capping in deep areas	MNR
SED 8	Removal to 1 mg/kg depth horizon w/ backfill	Removal to 1 mg/kg depth horizon w/ backfill	Removal/ stabilization	Removal to 1 mg/kg depth horizon w/ backfill	Removal to 1 mg/kg depth horizon w/ backfill	Removal to 1 mg/kg depth horizon w/ backfill	Removal to 1 mg/kg depth horizon w/ backfill	MNR	Removal to 1 mg/kg depth horizon w/ backfill	MNR

Notes:

MNR – Monitored Natural Recovery

TLC – Thin-Layer Capping