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USA

August 24, 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 (GEC850)
Request for Extension of Time to Prepare CMS Report**

Dear Ms. Svirsky:

The General Electric Company requests an extension of time until March 21, 2008, to submit to EPA the Corrective Measures Study (CMS) Report for the Rest of River, as required by Special Condition II.G of the Reissued RCRA Permit. In support of this request, GE states the following:

- On July 11, 2007, GE submitted to EPA a Treatability Study Work Plan to evaluate, in the CMS, chemical extraction as a potential treatment technology for removed soils and sediments. The Work Plan was developed in response to EPA's request, in its April 13, 2007 "conditional approval" of GE's CMS Proposal, that GE conduct such a treatability study. Attachment C to the Work Plan noted that it will take approximately 20 weeks from the date that EPA approves the Work Plan to conduct the treatability study, analyze the data, and prepare a report thereon. EPA provided conditional approval of the Work Plan on July 31, 2007. Further, once the treatability study has been completed, the results will need to be integrated into the evaluation and cost estimation of chemical extraction and the comparative evaluation of that technology with other potential *ex-situ* treatment/disposition alternatives in the CMS Report. While difficult to estimate at this time, it is anticipated that integrating the results of the treatability study into the CMS will take at least several additional weeks.
- In developing the Rest of River fate, transport, and bioaccumulation model, EPA used a data-based method for assigning boundary conditions to the East Branch during the model calibration and validation periods. As EPA has recognized, that approach cannot be used to establish future boundary conditions for the East Branch (i.e., boundary conditions following completion of the ½ Mile and 1½ Mile Removal Actions and the Removal Actions Outside the River) in simulating the various sediment remedial alternatives during the CMS. This is a critical part of the EPA model, and the model cannot be used to simulate sediment remedial scenarios until those conditions are established. To support the development of both current and future East Branch boundary conditions, GE proposed additional water column and sediment sampling, which was initiated based on preliminary approval in April and approved by EPA in the Agency's May 24, 2007 "conditional approval" of the Model Input Addendum

(MIA). A proposed procedure for developing the East Branch current and future boundary conditions that integrates these recent data was submitted to EPA on August 3, 2007. GE will not be able to run the model to compare sediment remedial alternatives – which is at the heart of the CMS process – until the upstream boundary conditions have been approved by EPA.

While GE has succeeded in shortening run times for EPA's fate and transport model by using more powerful processors, the model still requires approximately 2 weeks of continuous CPU time to execute a single 52-year projection of model for the Primary Study Area (Reaches 5 and 6). An additional 2 weeks is required to execute a single projection of the model for Reaches 7 and 8. Given the number of sediment alternatives to be evaluated in the CMS and the fact that some evaluations are likely to be iterative (i.e., requiring modifications after results from prior model runs are known), several months will be needed for the necessary model runs to be completed once the boundary conditions are established.

- In its conditional approval letters for both the CMS Proposal and the MIA, EPA directed GE to use both upper and lower bounds for a number of the parameters used to simulate sediment remedial scenarios through the model (e.g., boundary conditions, post-remediation sediment PCB concentrations, backfill PCB concentrations). This will further significantly increase the number of model runs required to complete the CMS and, hence, the overall time to complete the CMS.
- Due to EPA's directives, some of the procedures to be used in the CMS evaluations were not or will not be known until several months after EPA's initial "conditional approval." For example, EPA's April 13, 2007 conditional approval letter required GE to propose a revised methodology for applying the Interim Media Protection Goals for piscivorous mammals. GE proposed a revised methodology in its May 11, 2007 CMS Proposal Supplement. However, in its July 11, 2007 conditional approval letter for the Supplement, EPA directed GE to make substantial changes to that methodology. Further, on July 25, 2007, GE invoked dispute resolution under the Permit on several of those directives. Thus, the methodology to be used for these evaluations is still not resolved.
- EPA's conditional approval letters for the CMS Proposal, the MIA, and the CMS Proposal Supplement contained numerous other conditions and directives. Many of these have increased the scope and complexity of the CMS. For example, Comment # 29 in EPA's April 13 conditional approval letter directs GE to "apply the Evaluation Criteria in the CMS to each alternative and each sediment/bank area, except where the alternatives being considered are sufficiently similar to warrant aggregation." Applying the evaluation criteria to each alternative "and each sediment/bank area" substantially increases the amount of evaluation and documentation required in the CMS Report.

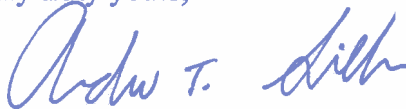
As described above, numerous developments have impacted the schedule for completion of the CMS. The most significant impact on the schedule is the need to conduct a treatability study of chemical extraction. Moreover, when this is combined with the other factors described above, as

well as the very substantial work that will be required to evaluate the range of sediment, floodplain, and treatment/disposition alternatives under the criteria in the Permit, it is clear that several additional months will be needed to complete the CMS studies and evaluations and develop the CMS Report.

It is our best estimate, at this time, that the CMS can be completed by March 21, 2008. If additional delays or problems are encountered, we will promptly bring them to EPA's attention and ask for additional time as necessary.

Thank you for considering this request, and please let me know if you have any questions about this matter.

Very truly yours,



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

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