



March 9, 2006

GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

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)
Revised Interim Media Protection Goals Proposal**

Dear Ms. Svirsky:

Pursuant to Special Conditions II.C and II.D of the Reissued RCRA Corrective Action Permit (the Permit) issued by the U.S. Environmental Protection Agency (EPA) to the General Electric Company (GE) on July 18, 2000, GE hereby submits the enclosed revised Interim Media Protection Goals Proposal (IMPG Proposal) for the Rest of River.

GE initially submitted an IMPG Proposal to EPA on September 6, 2005. On December 9, 2005, EPA issued a letter to GE in which EPA disapproved that IMPG Proposal and directed GE to submit a revised IMPG Proposal to correct certain purported "deficiencies" identified in EPA's letter and to make numerous other specific revisions identified in an attachment to EPA's letter.

At GE's request, EPA extended the deadlines for GE to invoke dispute resolution on EPA's disapproval (to January 23, 2006) and to submit a revised IMPG Proposal (to March 10, 2006). In addition, EPA and GE representatives met on a number of occasions to discuss EPA's December 9, 2005 comments.

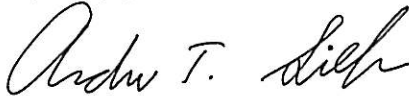
On January 23, 2006, GE submitted a notice to EPA in which it invoked dispute resolution, pursuant to Special Condition II.N.1 of the Permit, on EPA's disapproval of the September 2005 IMPG Proposal. In that notice letter, GE explained that, while it believes that it was not required to take that step in order to raise any objections to EPA's disapproval of the IMPG Proposal in a later proceeding to review EPA's modification of the Permit to select corrective measures for the Rest of River, GE was nevertheless invoking dispute resolution as a protective measure to ensure that its objections are preserved for the record. GE's notice letter was accompanied by a summary Statement of Position outlining GE's main objections. At the same time, GE proposed to stay that dispute resolution proceeding until either (a) the time when GE can seek administrative dispute resolution regarding EPA's notification of its intended decision on the Permit modification to select corrective measures, or (b) the time of an appeal of that Permit modification pursuant to the Permit and the Consent Decree. As part of that proposal, GE agreed to submit a revised IMPG Proposal by March 10, 2006. In a letter dated January 25, 2006, EPA agreed to the proposed stay on the terms set forth in GE's letter.

GE disagrees with EPA's determination that the prior IMPG Proposal was "deficient," and with a number of EPA's directives for revising the IMPG Proposal. The primary areas and bases of that disagreement are summarized in GE's Statement of Position accompanying its dispute resolution notice, a copy of which is also enclosed herewith. Nevertheless, as required by the Permit and the Consent Decree, GE has revised the IMPG Proposal to implement EPA's directives, despite its disagreement with many of them. This revised IMPG Proposal does not reflect GE's views on the appropriate IMPGs for the Rest of River area or on the appropriate underlying exposure assumptions, toxicity values, or data interpretations for human health or ecological protection.

In making the EPA-directed revisions to the IMPG Proposal, GE preserves its position on the issues set out in its Statement of Position attached to its notice of dispute, including its objections to EPA's directives. Moreover, as stated therein, in the event that GE raises these or other issues in a dispute resolution proceeding or appeal following expiration of the stay, GE will revise or modify the issues as appropriate at that time and will provide additional rationale and explanations for its positions. Further, as set out in the Statement of Position, GE also preserves all positions stated in prior submissions to EPA relating to human health or ecological risk issues, as well as any other rights that GE has under the Permit, the Consent Decree, or applicable law.

Please let me know if you have any questions about this revised IMPG Proposal or would like additional copies.

Very truly yours,



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

Enclosures

cc: Dean Tagliaferro, EPA	Kevin Mooney, GE
Timothy Conway, EPA	Russell Keenan, AMEC
Holly Inglis, EPA	Ellen Ebert, AMEC
Rose Howell, EPA*	John Schell, BBL Sciences
Susan Steenstrup, MDEP	Ken Jenkins, BBL Sciences
Anna Symington, MDEP	Larry Barnthouse, LWB Environmental
Robert Bell, MDEP	Miranda Henning, ENVIRON
Thomas Angus, MDEP	Margaret Branton, BEC
Susan Peterson, CDEP	James Bieke, Goodwin Procter
Michael Carroll, GE	Samuel Gutter, Sidley Austin
Jane Gardner, GE	
Roderic McLaren, GE	

(* without enclosures)