GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Delivery

May 1, 2006

Ms. Sharon M. Hayes
GE Facility Project Manager
United States Environmental Protection Agency
One Congress Street, Suite 1100
Boston, MA 02114-2023

Re: GE-Pittsfield/Housatonic River Site
40s Complex (GECD120)
Demolition, Disposition, and Site Restoration Activities – Buildings 42, 43/43-A, 44

Dear Ms. Hayes:

As a follow-up to our recent discussions, the General Electric Company (GE) has prepared this letter to document the agreements reached between the U.S. Environmental Protection Agency (EPA) and GE regarding the partial removal and subsequent restoration of the concrete floor slabs of Buildings 42, 43/43-A, and 44 at GE's facility in Pittsfield, Massachusetts. Specifically, as part of the demolition of these buildings, GE had previously proposed to remove a portion of the Building 42 floor slab and to cover the remaining concrete floor slabs with a layer of crushed debris, soil, and vegetation. That proposal was described in a July 6, 2005 letter from GE titled *Supplemental Building Material Characterization Report – Buildings 42, 43/43-A, 44* (Supplemental Building Characterization Report). Since EPA's conditional approval of that report (provided in a letter to GE dated August 18, 2005), GE initiated demolition activities in March 2005, and above-grade demolition activities at Buildings 42, 43/43-A, and 44 are now substantially complete. GE is currently processing/crushing suitable building demolition debris for subsequent placement in a stockpile area to be located immediately west of the former buildings (consistent with the activities documented in the above-referenced correspondence).

As described in the above-referenced document, the approved plan called for the removal of a portion of the Building 42 concrete floor slab (also referred to as a "carve-out") and disposal of the removed slab material at the Building 71 On-Plant Consolidation Area (OPCA). Furthermore, following this removal, GE would place a layer of crushed demolition debris over the remaining portions of the concrete floor slabs of Buildings 42, 43/43-A, and 44, as well as an additional 4 inches of topsoil and seed. However, as discussed below, while GE still plans on performing the carve-out of the Building 42 concrete floor slab, GE and EPA discussed a different approach than that previously documented concerning the disposition of the removed slab materials and for the restoration of the remaining portions of the concrete floor slabs.

Building 42 Partial Slab Removal Activities

The total area of the concrete slab-on-grade floor associated with Building 42 is approximately 48,000 square feet. The portion of the Building 42 concrete floor slab to be removed is approximately 60 feet by 150 feet, or approximately 9,000 square feet (see Figure 1). The portion of the floor slab to be removed includes the Building 42 concrete floor surrounding Sample ID 42-CW-6, and this area was selected for removal because it is bounded by the locations of two concrete column samples indicating PCB

concentrations less than 50 ppm (Table 1 and Figure 1). While there were no PCB data collected from the concrete slab itself, data obtained from these above-grade materials were applied to the underlying floor as a conservative measure in the absence of floor data. This carve-out area will be removed in its entirety (i.e., the full thickness of the slab and existing foundation elements) and segregated for transportation to an appropriate out-of-state disposal facility. Following removal, the remaining void space will be backfilled to grade with crushed demolition debris and properly compacted.

Post-Demolition Restoration Activities

Following completion of demolition activities and partial slab removal, the remaining concrete floors of former Buildings 42, 43/43-A, and 44 will be left intact and crushed demolition debris will be placed as needed to fill tunnels, vaults, and other remaining voids in the slabs, as well as to establish a level grade between the slabs and the surrounding surfaces. However, except as stated in the preceding sentence, crushed debris will not be placed on the remaining areas of slabs from these former buildings, nor will 4 inches of topsoil or seed be required on the remaining areas of slab. In addition, to provide structural support, GE will place some of the building demolition debris to form a wedge along the southern side of the Kellogg Street retaining wall and the western side of the Woodlawn Avenue retaining wall. However, to facilitate surface water infiltration and to mitigate the potential for the accumulation or ponding of water on the remaining slabs, these backfilled areas will not be covered with asphalt and/or concrete.

Additionally, the remaining floor slabs of former Buildings 42, 43/43-A, and 44 will be addressed consistent with EPA's January 26, 2006 conditional approval letter for demolition and disposition activities at Buildings 1, 2, 3, 3B, 15, 15A, 15B, and 15W located in the East Street Area-2 North Removal Action Area (RAA). Specifically, GE will submit a plan for EPA's approval regarding the characterization and disposition of the remaining slabs of former Buildings 42, 43/43-A, and 44. The plan will be submitted the earlier of 1) 30 days after GE receives notice of the Pittsfield Economic Development Authority's foundation requirements for the 40s Complex RAA or 2) December 29, 2006. If any slabs are to be removed, GE will provide details regarding the characterization of the slabs for disposition. If GE elects to leave any slabs in place, GE will submit to EPA information documenting how this option will be protective of human health and the environment. If at such time the future intended use for any slab is unknown or if any slab will remain unused, GE will submit a proposal for the installation and maintenance of appropriate engineering controls to mitigate direct contact and groundwater leaching risks. If any slabs are to remain in place, that plan shall also propose any provisions of the ERE for the 40s Complex that should be required to eliminate any potential direct contact risks, unless such slabs are sampled and anticipated uses are found to be acceptable to the ERE grantee.

If you have any questions or require additional information, please feel free to contact me.

Sincerely,

John Novotny /MPH

John F. Novotny, P.E.
Manager, Facilities and Brownfields Programs

GDR/cmb
Attachment

cc: Dean Tagliaferro, EPA
Tim Conway, EPA
John Kilborn, EPA
Holly Inglis, EPA
Rose Howell, EPA
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP
Jane Rothchild, MDEP
Linda Palmieri, Weston (2 copies)
Tom Hickey, Director, PEDA
Mayor James Ruberto, City of Pittsfield
Pittsfield Department of Health
Jeffrey Bernstein, Bernstein, Cushner & Kimmell
Teresa Bowers, Gradient
Michael Carroll, GE
Andrew Silfer, GE
Roderic McLaren, GE
James Nuss, BBL
James Bieke, Goodwin Procter
Larry Kirsch, Goodwin Procter
Public Information Repositories
GE Internal Repository

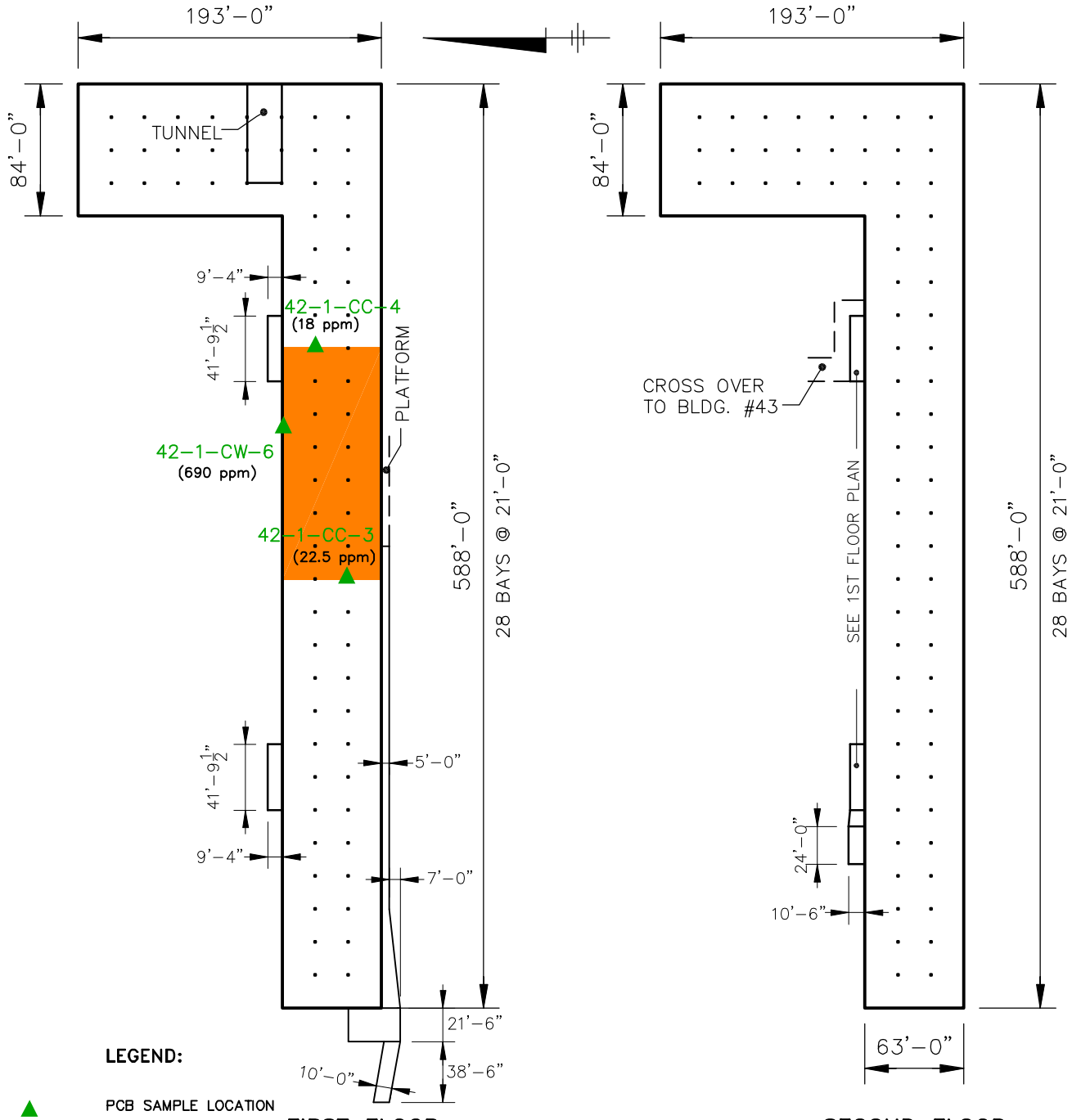
TABLE 1
PCB SAMPLE DATA

40s COMPLEX BUILDING MATERIAL CHARACTERIZATION SAMPLING
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Sample ID	Date Collected	Aroclor-1016, -1221, -1232, -1242	Aroclor-1248	Aroclor-1254	Aroclor-1260	Total PCBs
Building 42						
42-1-CC-3	1/30/2004	ND(0.33) [ND(1.7)]	ND(0.33) [ND(1.7)]	3.0 [42]	ND(0.33) [ND(1.7)]	3.0 [42]
42-1-CC-4	1/30/2004	ND(3.3)	ND(3.3)	18	ND(3.3)	18
42-1-CW-6	1/30/2004	ND(83)	ND(83)	690	ND(83)	690

Notes:

1. Sample ID consists of Building Number-Floor Number-Material Type-Sample Number Material Designations:
   CC - Concrete Column
   CW - Concrete Wall
2. Samples were collected by Blasland, Bouck & Lee, Inc., and submitted to SGS Environmental Services, Inc. (formerly CT&E Environmental Services, Inc.) for analysis of PCBs.
3. Shaded samples indicate PCB concentrations exceeding 50 ppm.
4. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
5. Duplicate sample results are presented in brackets.



NOTES:

1. THE GENERAL LAYOUT FOR THIS FIGURE WAS OBTAINED FROM A SKETCH PREPARED BY THE GENERAL ELECTRIC COMPANY TITLED "1ST & 2ND FLOOR PLAN BLDG 42, DATED MAY 10, 1946, REVISED FEBRUARY 1, 1961, DRAWING NO. K-9254442, SHEET 1.
2. SAMPLE ID'S CONSIST OF BUILDING NUMBER-FLOOR NUMBER-MATERIAL TYPE-SAMPLE NUMBER. MATERIAL DESIGNATIONS ARE AS FOLLOWS:

   CC - CONCRETE COLUMN
   CW - CONCRETE WALL
3. LOCATIONS ARE APPROXIMATE.
4. THE SAMPLE RESULT FOR SAMPLE ID 42-1-CC-3 (22.5 PPM) REPRESENTS THE ARITHMETIC AVERAGE OF THE PARENT AND DUPLICATE SAMPLE (3 PPM AND 42 PPM, RESPECTIVELY).

X: 20671X00, X01.DWG
L: ON=* OFF=*REF*, P: PAGESET/PLT-AP1
5/1/06 SYR-85-NES PRO LJP
C/20671003/20671G24.DWG

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
40s COMPLEX DISPOSITION ACTIVITIES

1ST & 2ND FLOOR PLANS BUILDING 42

BBL BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
1