



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ONE CONGRESS STREET, SUITE 1100
BOSTON, MA 02114-2023



SDMS DocID 244880

GE-Housatonic
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244880

February 15, 2006

Mr. Andrew T. Silfer
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 October 7, 2005 *Supplement to Conceptual Removal Design/Removal Action Work Plan and Proposal for Additional Investigations, East Street Area 2-North*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Supplement to Conceptual Removal Design/Removal Action Work Plan for East Street Area 2-North*, (Supplement Work Plan) dated October 7, 2005. This Supplement to the Work Plan 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 above-referenced Supplement to the Work Plan, subject to the following conditions:

1. With regard to the six additional Appendix IX+3 samples to be collected, GE shall make every effort to achieve detection limits for benzidine that are lower than, or closer to, the applicable Region IX PRG of 0.013 ppm, to the extent practicable.
2. GE shall create a separate averaging area for the portion of the East Street Area 2-North Removal Action Area which will be transferred to PEDDA as identified in the October 7, 2005 Supplement Work Plan. For that separate averaging area, GE shall evaluate the need for removal actions (e.g., soil removal, enhanced pavement, engineered barrier, etc.) to achieve the applicable Performance Standards for the property that will be transferred to PEDDA. If additional land from the East Street Area 2-North Removal Action Area is to be transferred to PEDDA, GE shall create a revised averaging area encompassing all land transferred and to be transferred to PEDDA and re-evaluate the need for additional removal actions to achieve the applicable Performance Standards for the entire property transferred and to be

transferred to PEDDA. If additional land from the East Street Area 2-North Removal Action Area is to be transferred by GE to a third party other than PEDDA, GE shall create a revised averaging area encompassing all land to be transferred to that third party and re-evaluate the need for additional removal actions to achieve the applicable Performance Standards for the entire property to be transferred to that third party. GE shall also continue to evaluate the overall East Street Area 2-North Removal Action Area as a single averaging area.

3. Although not required to meet the applicable soil-related Performance Standards for this Removal Action Area, GE shall consider removing soil in the vicinity of PS-W-52 through PS-W-55 due to VOC concentrations in the 2-6 and 6-10 foot depth intervals, and specifically near PS-W-55B, where elevated levels of PCE (20,000 ppm) and TCE (8,000 ppm) were found in the 2-6 foot depth interval.

Errata: Page 4, line 1 – The reference to sample location RAA5-J12 should be RAA5-J10.

EPA agrees with GE's proposed schedule for submitting the Addendum to the Conceptual Work Plan (due within 60 days of this letter).

EPA reserves its right to perform additional sampling or evaluations in the areas subject to this Supplement to the Work Plan, and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (617) 918-1328.

Sincerely,



Sharon M. Hayes
GE Facility Project Manager

cc:

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|------------------|-----------------|---------------------------------|-----------------------------|
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