



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

March 29, 2007

Mr. Michael T. Carroll, Manager
Pittsfield Remediation Programs
General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's February 5, 2007 submittal titled *Evaluation of Need for Additional Soil Investigations and Sampling Proposal – Woodlawn Avenue Portion of the East Street Area 2-North RAA*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Carroll:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Evaluation of Need for Additional Soil Investigations and Sampling Proposal – Woodlawn Avenue Portion of the East Street Area 2-North RAA*, dated February 5, 2007. This letter 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 submittal, subject to the following conditions:

1. In addition to evaluating the Woodlawn Avenue Area as shown in Figures 2 and 3 of the sampling proposal as part of East Street Area 2-North, GE shall consider evaluating the entire Woodlawn Avenue Area as a separate, unpaved area. Specifically, in addition to the sampling proposed in its previous submittal, GE shall collect soil samples from proposed soil boring locations SB-1, SB-2, and SB-3, at the 6-15 foot depth intervals for analysis of PCBs. Also, GE shall collect one sample from each of the proposed soil boring locations for analysis of Appendix IX+3 constituents, excluding herbicides and pesticides. One sample shall be collected from each of the 0-1 foot, 1-6 foot, and 6-15 foot depth intervals. The specific sample location and depths for these samples shall be field determined. Along with historical PCB and Appendix IX+3 data from existing soil boring locations RAA1-12, 40-BH000473, and RAA 5-I1, the analytical results from this additional sampling and the sampling proposed in GE's previous submittal shall be incorporated into the revised RD/RA evaluations to be presented in the Addendum to the Final RD/RA Work Plan for East Street Area-2 North.

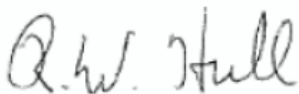
2. GE shall collect at least one additional soil boring from within the unpaved area located immediately to the north of the electric utility line tunnel, at the western border of the Woodlawn Avenue Area, as shown in Figures 2 and 3 of the sampling proposal. One sample shall be collected from each of the 0-1 foot, 1-6 foot, and 6-15 foot depth intervals and analyzed for PCBs and a sample from one of the depth intervals shall be analyzed for Appendix IX+3 constituents, excluding herbicides and pesticides. The results shall be incorporated in the Woodlawn Avenue Area evaluation and the revised RD/RA evaluations to be presented in the Addendum to the Final RD/RA Work Plan for East Street Area-2 North. If GE decides to not evaluate the entire Woodlawn Avenue Area as a separate, unpaved area, then GE shall identify to EPA the unpaved areas within the Woodlawn Avenue Area and evaluate those areas as unpaved.
3. GE shall provide more specific information regarding the nature of the existing electric utility crossing Woodlawn Avenue Area, including its status as active or inactive and if it is located within a tunnel and therefore not subject to emergency repairs that would involve the contact with soil. This information shall be included in the Addendum to the Final RD/RA Work Plan for East Street Area-2 North.

GE shall conduct the additional sampling as described in its sampling proposal and as required in 1 and 2 above, and submit the results in the Addendum to the Final RD/RA Work Plan for East Street Area 2-North within 60 days of receipt of this letter. Such addendum shall include a utility corridor evaluation for all utilities subject to emergency repair in the Woodlawn Avenue Area.

EPA reserves its right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the CD. If there is any conflict between the Performance Standards as stated in the Work Plan and the Performance Standards as stated in the CD and SOW, the CD and SOW shall control.

If you have any questions, please contact me at (617) 918-1882.

Sincerely,



Richard W. Hull
GE Facility Project Manager

cc:

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