



GE
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USA

Transmitted Via Federal Express

December 21, 2006

Mr. Dean Tagliaferro
United States Environmental Protection Agency
c/o Weston Solutions
10 Lyman Street
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
East Street Area 2-North (GEC140)
Proposal for At-Grade Concrete Slabs of Buildings in the 19s Complex**

Dear Mr. Tagliaferro:

In a letter to the General Electric Company (GE) dated January 26, 2006, the U.S. Environmental Protection Agency (EPA) provided conditional approval of GE's proposed demolition and disposition activities for the above-grade portions of Buildings 1, 2, 3, 3B, 15, 15A, 15B, and 15W at the GE facility. These buildings (except for Building 3B) are located within a portion of the East Street Area 2-North Removal Action Area known as the 19s Complex, which GE intends to transfer to the Pittsfield Economic Development Authority (PEDA) under the Definitive Economic Development Agreement. For the at-grade concrete slabs to remain following the demolition activities, EPA's letter directed GE to submit a plan to EPA regarding the characterization and disposition of those slabs by the earlier of (1) 30 days after GE receives notice of PEDA's foundation requirements for the 19s Complex, or (2) December 29, 2006. EPA required that this plan provide the following information:

- If the slabs are to be removed, details regarding the characterization of the slabs for disposition;
- If the slabs are to remain in place, information documenting how this option will be protective of human health and the environment; and/or
- If the future intended use for any slab is unknown or if any slab will remain unused, a proposal for the installation and maintenance of appropriate engineering controls.

At the present time, PEDA has not identified a course of action for the future use(s) of the 19s Complex, including the at-grade concrete slabs within that complex. Given this situation, GE has prepared a proposed plan for future activities related to these slabs. In addition, while only the above-referenced buildings were addressed in EPA's January 26, 2006 conditional approval letter, EPA has indicated during recent discussions that all the other remaining building slabs located within the 19s Complex need to be addressed in a similar manner. The remainder of this letter identifies the current status of building demolition activities at the 19s Complex and describes GE's proposed plan for the future handling of the at-grade concrete slabs of those buildings. (In proposing this plan, GE notes its position that there is no basis in the Consent Decree to require such activities for building slabs, and it reserves the right to contest such requirements in the future.)

There are numerous buildings in the 19s Complex that have either been demolished or are scheduled to be demolished. The at-grade concrete slabs associated with all of the buildings that have previously been demolished currently remain present. The status of demolition activities within the 19s Complex is summarized below.

Buildings Previously Demolished:

- Buildings 1, 2, and 3;
- Buildings 4, 5, and 6;
- Building 8/8E; and
- Buildings 15, 15A, 15B, and 15W.

Buildings Scheduled for Demolition:

- Buildings 17, 17C, and 19; and
- Buildings 11, 16, and 16X.

With regard to the at-grade concrete slabs of these building, GE and PEDDA have not initiated any discussions regarding the foundation requirements at the 19s Complex, and PEDDA has not provided an indication of its plans related to the slabs at the 19s Complex. Moreover, given that several large buildings located within the 19s Complex still require demolition and subsequent site restoration, the 19s Complex continues to be an active construction site, which involves some limited use of the existing slabs for construction-related activities (e.g., vehicle traffic, staging of clean equipment and materials).

In this situation, GE cannot provide EPA with specific details regarding PEDDA's future intended use of the 19s Complex, including the building slabs. However, GE can advise EPA that the existing and future at-grade slabs at the 19s Complex will be covered by new buildings, pavement, soil, or another appropriate surface cover, although the specific type(s) of cover and the timing for installation of the covers are uncertain at this point. In these circumstances, GE proposes to implement the following activities related to the existing and future at-grade slabs:

- First, during the period prior to transfer of the 19s Complex to PEDDA, GE, as current owner of this area, will continue to maintain the area as a controlled site, with continued implementation of security measures and perimeter fencing.
- Second, prior to transfer of the 19s Complex to PEDDA, GE will submit to EPA a specific plan relating to the slabs. This plan will identify the areas and type of cover system that will be installed over these slabs. If, at that time, PEDDA's development plans for the slabs are known, the proposed cover system will take those plans into account. For example, if PEDDA's plans call for the installation of new buildings, concrete slabs, asphalt pavement, or fill materials over the existing building slabs, those materials would serve as the covers, and hence no further activities would be proposed for such areas. In that case, GE would propose to install, prior to transfer, a vegetated soil cover over any portions of the slabs that would not have a cover under PEDDA's redevelopment plans. If, at the time of this submission, PEDDA's plans for the future use of these slabs are still unknown or if the slabs are intended to remain unused, GE's plan will call for installation of a vegetated soil cover over the slabs prior to transfer – unless (a) GE and PEDDA agree and jointly propose that PEDDA will continue to maintain appropriate institutional controls (e.g., site security and other Post-Removal Site Control activities applicable to the area after transfer) at the 19s Complex until a cover is installed over the slabs, and (b) EPA approves that proposal.

In addition, although Buildings 3B and 7 are not located within the 19s Complex, GE proposes to implement the same activities for the slabs of those buildings on the same timetable noted above.

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

Sincerely,

Michael Carroll/MPH

Michael T. Carroll
Manager, Pittsfield Remediation Programs

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