



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

January 16, 2007

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 August 25, 2006 submittal titled *Final Removal Design/Removal Action Work Plan, 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 *Final Removal Design/Removal Action Work Plan for East Street Area 2-North*, dated August 25, 2006. This 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 submittal, subject to the following conditions:

1. GE shall not decommission groundwater wells ES1-11 and RF-13 (which was inadvertently labeled as ES1-13 on Technical Drawing 1) at this time. In the Addendum to the Final Removal Design/Removal Action Work Plan, GE shall specify that these wells will be protected during excavation activities, and GE will submit a revised version of Technical Drawing 1 with the monitoring well ES1-13 correctly identified. GE shall evaluate the condition of well ES1-6. If the obstruction in well ES1-6 can be cleared and the well can be used in the future, then GE shall not abandon the well. If it is not practical to remove the obstruction such that the well can be used in the future, then GE shall properly abandon the well. GE shall provide this evaluation in the Addendum to the Final Removal Design/Removal Action Work Plan.
2. Several areas that GE depicts as a "Paved Area" on Figures 2-1 and 4-1 have pavement that is degraded. GE shall clarify, on a figure to be submitted in the Addendum to the Final Removal Design/Removal Action Work Plan, the extent of the areas that are to be considered as "paved" for the purpose of complying with the

soil-related Performance Standards (e.g., areas that were characterized on a paved frequency). Within such areas, GE shall show the areas of degraded pavement where GE will replace or repair the pavement. Alternatively, GE may elect to consider some of these areas as “unpaved” for the purposes of complying with the Performance Standards for unpaved areas. All areas determined to be paved for the purposes of meeting the Performance Standards will need to be surveyed and included in the plans attached to the ERE for the RAA.

3. GE shall select a remediation contractor within 60 days from the date of the approval of the Addendum to the Final Removal Design/Removal Action Work Plan.
4. GE shall include, in the Addendum to the Final Removal Design/Removal Action Work Plan, an updated chart of the project participants.
5. As indicated in Section 7.5.4 of the Final Removal Design/Removal Action Work Plan, GE shall include, in the Addendum to the Final Removal Design/Removal Action Work Plan, a figure showing truck routes should GE determine to transport any materials to the Hill 78 OPCA for disposal. Such truck routes shall be consistent with recent modifications to the operating procedures for the OPCAs.
6. In Section 8.2, GE should acknowledge that EREs must be recorded before the submission of a Final Completion Report and before EPA issues a Certificate of Completion for this Removal Action Area. GE shall acknowledge this in the Addendum to the Final Removal Design/Removal Action Work Plan.
7. GE shall modify section 10.2 of Attachment D as follows: “If the 10-hour average  $PM_{10}$  concentration at any on-site monitor exceeds the notification level of  $120 \mu g/m^3$ , regardless of background levels, the exceedance shall be reported to EPA as soon as practical, but no later than 24 hours following receipt of the data showing the exceedance. GE shall provide written notice of the exceedance within 72 hours following receipt of the data showing the exceedance. GE shall take appropriate steps to prevent an exceedance of the action level and shall discuss with EPA the need for and type of additional response actions. The actions to be considered shall include those previously implemented by GE at other areas at the CD site (e.g., increased frequency of monitoring, additional monitoring locations, increased use of dust suppression measures, modifications to dust-producing activities).” GE shall acknowledge this requirement in the Addendum to the Final Removal Design/Removal Action Work Plan.
8. Attachment E shall state that maintenance and repair activities shall include the maintenance and repair of areas sampled and evaluated on a paved frequency. GE shall clarify the frequency of inspection activities after the initial two years. GE shall acknowledge these requirements in the Addendum to the Final Removal Design/Removal Action Work Plan.

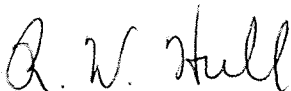
9. GE shall include the portion of Woodlawn Avenue located between the East Street Area 2-North RAA and the 40s Complex RAA in the East Street Area 2-North RAA, and shall revise the RD/RA figures, tables, and evaluations in future submittals as necessary to reflect that change. In addition, GE shall evaluate the need for additional sampling in this area (based on the CD requirements for pre-design investigations, and taking into account, among other things, the utility corridor evaluation criteria and any existing soils data) and submit that evaluation to EPA within 21 days of the date of this letter. If GE's evaluation indicates the need for additional sampling, such sampling shall be proposed by GE in that submittal.
  
10. GE shall comply with the FSP/QAPP/POP, as revised, in implementing the East Street Area 2-North response actions should the FSP/QAPP/POP, as revised, conflict with the Final Removal Design/Removal Action Work Plan. GE shall also comply with any subsequent addenda to the Work Plan and any associated EPA conditional approval letters. GE shall acknowledge this requirement in the Addendum to the Final Removal Design/Removal Action Work Plan.

GE shall submit an Addendum to the Final Removal Design/Removal Action Work Plan addressing these comments within 60 days of EPA's approval of the Woodlawn Avenue evaluation and, if proposed, sampling plan, as described in comment #9 above.

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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