



**United States Environmental Protection Agency
One Congress Street, Suite 1100 (HBO)
Boston, MA 02114-2023**

December 18, 2007

Mr. Richard W. Gates, Remediation Project Manager
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 November 13, 2007 submittal titled *East Street Area 2-North Removal Action Area Supplemental Information Package*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Gates:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *East Street Area 2-North Removal Action Area Supplemental Information Package* (the "SIP") dated November 13, 2007. The SIP 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 apply specific contingencies for the discovery of buried containers, such as drums, capacitors or transformers, during excavation, similar to those included in the Contingency Plan for construction of the pipelines at Hill 78 Area Remainder RAA and elsewhere, to the East Street Area 2-North removal action. GE shall document these contingencies in the revised SIP.
2. Section 5.2 of the Hazard and Risk Analysis section of the Health, Safety and Contingency Plan (the "Plan") identifies PCBs as the only site contaminant of concern. Some of the soil removal will be conducted due to elevated levels of VOCs rather than PCBs. Maxymillian shall consider modifying Section 5.2 of the Plan to include VOCs as a contaminant of concern.
3. Maxymillian shall consider modifying Appendix B of the Plan to include Aroclors 1254 and 1260, as well as VOCs, as contaminants of concern, and MSDS sheets for these contaminants.

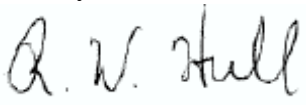
4. Maxymillian shall consider including in Section 6.0 of the Plan, the contractor's provision for real-time organic vapor monitoring (e.g., PID or similar) during excavation activities along with the proposal for dust monitoring.
5. The Operations Plan prepared by Maxymillian does not specify the measures or equipment that will be implemented for controlling dust. The Operations Plan shall specify what measures and equipment will be implemented for dust suppression.
6. It is recommended that GE develop an alternative approach for the excavation of materials from the polygon located on the slope at the corner of Merrill Road and New York Avenue and provide specific erosion control measures to be implemented during excavation activities. Current conditions suggest that the area at the toe of the slope is subject to flooding and poor drainage. Staging an excavator in this location may create an unsuitable work zone due to saturated soils, and may adversely impact runoff from the work area.
7. Section 6.0 of the Operations Plan shall include provisions for the inspection and decontamination of the exterior of transport and disposal vehicles prior to their departure from the site.
8. In order to comply with Section 2.2 of the Plan, which specifies that clean material not come into contact with contaminated equipment, a dedicated bucket may be used or the bucket used for removal activities may be decontaminated prior to backfilling.
9. GE shall include a detailed project schedule in the revised SIP, including start and complete construction dates.

Within 15 days of the date of this letter, GE shall submit a revised SIP to EPA which addresses the conditions above.

EPA reserves all of its rights under the CD, including but not limited to, the right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the CD.

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

Sincerely,

A handwritten signature in black ink that reads "R. W. Hull". The signature is written in a cursive style and is positioned above the printed name.

Richard W. Hull
GE Facility Project Manager

cc:

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