

Transmitted Via Overnight Delivery

May 12, 2008

Mr. Richard Cavagnero
Deputy Director
Office of Site Remediation and Restoration
United States Environmental Protection Agency
One Congress Street, Suite 1100
Boston, MA 02114-2023

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)
Agreement between PEDA and GE Regarding Crushed Building Demolition Debris
Placement and Potential Relocation**

Dear Messrs. Cavagnero and Tagliaferro:

The General Electric Company (GE) and the Pittsfield Economic Development Authority (PEDA) have jointly prepared this letter to address certain items discussed in the U.S. Environmental Protection Agency's (EPA's) February 25, 2008 letter to PEDA and the City of Pittsfield. That letter addressed, among other items, disposition of crushed building materials from Buildings 7, 11, 16, 17, 17C, and 19. As you know, there has been extensive correspondence and communications among EPA, PEDA, and GE over the course of the last 2 years relating to the topic of re-use of crushed building demolition debris in the 19s Complex.

Most recently, GE and PEDA met on April 2, 2008 to discuss the current draft crushed building demolition debris placement plans and to gain consensus regarding such plans. During this meeting, PEDA re-iterated its conditions related to their acceptance of the building demolition debris. These conditions, previously included in a July 9, 2007 letter to EPA, included the following:

- 1. PEDA must be able to re-use the building debris on any parcel owned by PEDA within the designated 52-acre William Stanley Business Park of the Berkshires.*
- 2. PEDA must be able to re-use the building debris without any additional testing or re-testing.*
- 3. If PEDA determines that it cannot use some or all of the building debris (i.e. it does not meet the performance standards or PEDA does not have a use for the material), then GE shall be responsible for and bear the cost of removing and properly disposing of the material.*

During this meeting, PEDA and GE reached agreement on the modified placement locations, and agreed that a joint letter from PEDA and GE to EPA would be sufficient to satisfy EPA's request for an agreement (i.e., to address condition 24 of EPA's January 9, 2008 letter).

A figure illustrating the placement locations agreed to by PEDA and GE during the April 2, 2008 meeting is attached to this letter. It is PEDA's and GE's expectation that this letter will satisfy EPA's request for


an agreement between PEDA and GE, and that the process of executing a CD modification can move forward. If EPA concurs that this agreement is acceptable, GE will revise and resubmit the draft placement plan (originally submitted on January 10, 2008) and draft CD modification to reflect the modified placement locations. PEDA and GE also agreed to minimize the number of relocations, and GE has agreed to be responsible for the relocation of the material at PEDA's request, either to another area within the PEDA properties, to another location subject to the CD (subject to EPA's approval), or to an off-site disposal facility. In either case, GE will arrange for the relocation and incur the costs associated with such relocation.

If EPA has any comments or questions concerning this letter, please contact me at your earliest convenience.

Sincerely,


Michael T. Carroll 5/9/2008
Date

Manager, Pittsfield Remediation Programs
General Electric Company


Thomas E. Hickey 5/9/2008
Date

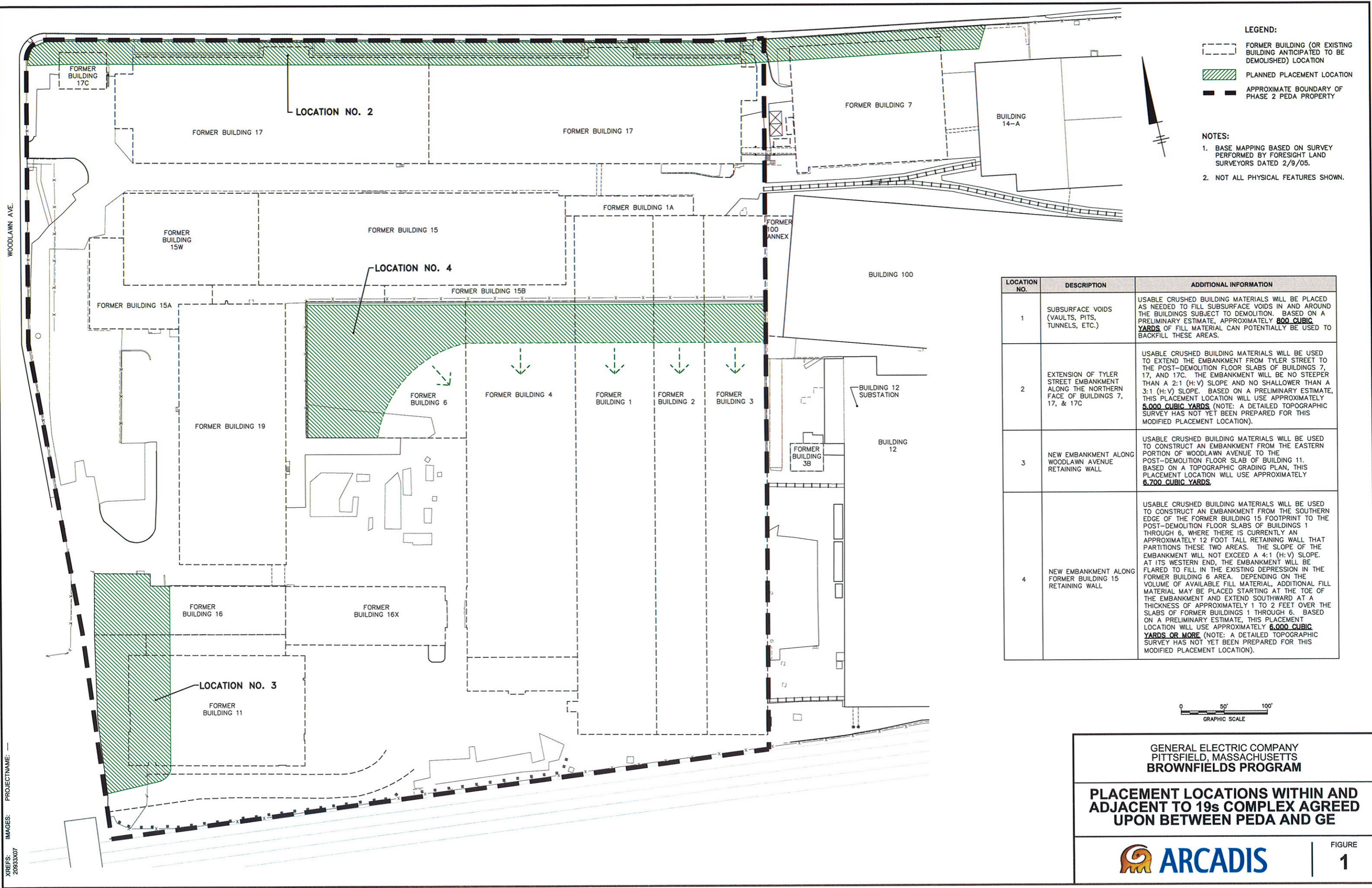
Executive Director
Pittsfield Economic Development Authority

Attachment

cc: T. Conway, EPA
J. Kilborn, EPA
H. Inglis, EPA
S. Steenstrup, MDEP
J. Rothchild, MDEP
A. Symington, MDEP
Mayor J. Ruberto, City of Pittsfield
J. Bernstein, BCK Law
B. Landau, BCK Law

T. Bowers, Gradient
R. McLaren, GE
A. Silber, GE
R. Gates, GE
J. Bieke, Goodwin Procter
S. Gutter, Sidley Austin
J. Nuss, ARCADIS
GE Internal Repositories
Public Information Repositories

CITY: SYRACUSE DIV/GRUP: 141 DB: GMS AGS LAF LD: DMW PIC: RM: M. HASSETT, TM: LYR: ONI-OFF-REF
 G:\CAD\GE-CAD\C-AC\18020953\000\000\02\DWG\PEDA\2095301.DWG LAYOUT: 1 SAIVED: 4/8/2008 10:55 AM ACADVER: 17.05 (LMS TECH) PAGES: 17 OF 17 PLOT: PLT\FULL\CTB PLOTTED: 5/12/2008 8:50 AM BY: POSENAUER, LISA
 XREFS: IMAGES: PROJECTNAME: 20953X07



LEGEND:
 - - - - - FORMER BUILDING (OR EXISTING BUILDING ANTICIPATED TO BE DEMOLISHED) LOCATION
 [Hatched Box] PLANNED PLACEMENT LOCATION
 [Thick Dashed Line] APPROXIMATE BOUNDARY OF PHASE 2 PEDA PROPERTY

NOTES:
 1. BASE MAPPING BASED ON SURVEY PERFORMED BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
 2. NOT ALL PHYSICAL FEATURES SHOWN.

LOCATION NO.	DESCRIPTION	ADDITIONAL INFORMATION
1	SUBSURFACE VOIDS (VAULTS, PITS, TUNNELS, ETC.)	USABLE CRUSHED BUILDING MATERIALS WILL BE PLACED AS NEEDED TO FILL SUBSURFACE VOIDS IN AND AROUND THE BUILDINGS SUBJECT TO DEMOLITION. BASED ON A PRELIMINARY ESTIMATE, APPROXIMATELY 800 CUBIC YARDS OF FILL MATERIAL CAN POTENTIALLY BE USED TO BACKFILL THESE AREAS.
2	EXTENSION OF TYLER STREET EMBANKMENT ALONG THE NORTHERN FACE OF BUILDINGS 7, 17, & 17C	USABLE CRUSHED BUILDING MATERIALS WILL BE USED TO EXTEND THE EMBANKMENT FROM TYLER STREET TO THE POST-DEMOLITION FLOOR SLABS OF BUILDINGS 7, 17, AND 17C. THE EMBANKMENT WILL BE NO STEEPER THAN A 2:1 (H:V) SLOPE AND NO SHALLOWER THAN A 3:1 (H:V) SLOPE. BASED ON A PRELIMINARY ESTIMATE, THIS PLACEMENT LOCATION WILL USE APPROXIMATELY 5,000 CUBIC YARDS (NOTE: A DETAILED TOPOGRAPHIC SURVEY HAS NOT YET BEEN PREPARED FOR THIS MODIFIED PLACEMENT LOCATION).
3	NEW EMBANKMENT ALONG WOODLAWN AVENUE RETAINING WALL	USABLE CRUSHED BUILDING MATERIALS WILL BE USED TO CONSTRUCT AN EMBANKMENT FROM THE EASTERN PORTION OF WOODLAWN AVENUE TO THE POST-DEMOLITION FLOOR SLAB OF BUILDING 11. BASED ON A TOPOGRAPHIC GRADING PLAN, THIS PLACEMENT LOCATION WILL USE APPROXIMATELY 6,700 CUBIC YARDS .
4	NEW EMBANKMENT ALONG FORMER BUILDING 15 RETAINING WALL	USABLE CRUSHED BUILDING MATERIALS WILL BE USED TO CONSTRUCT AN EMBANKMENT FROM THE SOUTHERN EDGE OF THE FORMER BUILDING 15 FOOTPRINT TO THE POST-DEMOLITION FLOOR SLABS OF BUILDINGS 1 THROUGH 6, WHERE THERE IS CURRENTLY AN APPROXIMATELY 12 FOOT TALL RETAINING WALL THAT PARTITIONS THESE TWO AREAS. THE SLOPE OF THE EMBANKMENT WILL NOT EXCEED A 4:1 (H:V) SLOPE. AT ITS WESTERN END, THE EMBANKMENT WILL BE FLARED TO FILL IN THE EXISTING DEPRESSION IN THE FORMER BUILDING 6 AREA. DEPENDING ON THE VOLUME OF AVAILABLE FILL MATERIAL, ADDITIONAL FILL MATERIAL MAY BE PLACED STARTING AT THE TOE OF THE EMBANKMENT AND EXTEND SOUTHWARD AT A THICKNESS OF APPROXIMATELY 1 TO 2 FEET OVER THE SLABS OF FORMER BUILDINGS 1 THROUGH 6. BASED ON A PRELIMINARY ESTIMATE, THIS PLACEMENT LOCATION WILL USE APPROXIMATELY 6,000 CUBIC YARDS OR MORE (NOTE: A DETAILED TOPOGRAPHIC SURVEY HAS NOT YET BEEN PREPARED FOR THIS MODIFIED PLACEMENT LOCATION).

GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
 BROWNFIELDS PROGRAM

PLACEMENT LOCATIONS WITHIN AND ADJACENT TO 19s COMPLEX AGREED UPON BETWEEN PEDA AND GE

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FIGURE
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