



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

Superfund Records Center
SUBJ: GE-Housatonic
PROJECT: 2.2
OFFICE: 236681

August 2, 2005

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 October 2004 *East Street Area 2-South Interim Letter Report – Proposed Additional RD/RA-Related Investigations*, 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 *East Street Area 2-South Interim Letter Report – Proposed Additional RD/RA-Related Investigations* (Report) dated October 22, 2004. This Report 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 revise Figure 2 of the Interim Letter Report to include sample locations RAA4-H12 and RAA4-J7, which appear to have been left off that figure.
2. GE shall install a new boring in the general vicinity of X-19 and consistent with previous pre-design investigation activities, analyze the boring for AIX+3 constituents (excluding pesticides and herbicides) at the following depth intervals: 0- to 1-foot, 1- 6-foot, and 6- to 15-foot depth intervals.
3. Table 3 (Proposed PRG Surrogates): EPA agrees with GE's proposed use of surrogate constituents to determine applicable PRGs with the following exceptions. For 7,12-dimethylbenz(a)anthracene, attachment F to the SOW specifies the use of benzo(a)pyrene as a surrogate for 7,12-dimethylbenz(a)anthracene, not benzo(a)anthracene. In further evaluations, GE shall use benzo(a)pyrene as the surrogate for 7,12-dimethylbenz(a)anthracene. In addition EPA does not agree with the surrogates for the following three of the listed compounds:

- a. 2-Acetoaminofluorene
- b. 3-Methylcholanthrene
- c. P-Dimethylaminoazobenzene

For these three compounds, GE shall provide additional information to support the proposed use of the surrogates identified above, propose alternate surrogates, or propose an alternative approach for addressing these constituents. In addition, in future references to 4,6 Dinitro-2-methylphenol, GE shall note that this compound is also known as 4,6 Dinitro-o-cresol.

Errata

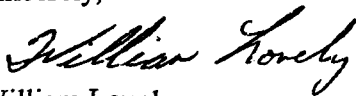
4. Figure 2: GE shall add a note to the legend to describe the green dashed line (i.e., proposed expansion area.)

GE shall address the comments above within 14 days of this letter by providing an addendum to the Report. This addendum shall include a revised figure showing the additional sampling locations.

EPA reserves its right to perform additional sampling in the areas subject to this Report and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (617) 918-1247.

Sincerely,



William Lovely
GE Facility Project Manager

cc:

Dean Tagliaferro, US EPA	John Novotny, GE
Tim Conway, USEPA	Mike Carroll, GE
John Kilborn, US EPA	Rod McLaren, GE
Rose Howell, US EPA	James Bieke, Goodwin Procter
Holly Inglis, USEPA	James Nuss, BB&L
Susan Steenstrup, MDEP	Dale Young, MA EOE
Anna Symington, MDEP	Richard Nasman, Berkshire Gas Company
Robert Bell, MDEP	Jeffrey Porter, Mintz, Levin
Kevin Rodrigues, MDEP	Robert Cataldo, ENSR
K.C. Mitkevicius, USACE	David Mauro, META
Linda Palmieri, Weston Solutions	Pittsfield Department of Health
Mayor James Ruberto, City of Pittsfield	Public Information Repositories