



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted Via Facsimile/Overnight Delivery*

July 13, 2006

Mr. William P. Lovely, Jr.  
United States Environmental Protection Agency  
EPA - New England (MC HBO)  
One Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site (GECD900)  
Results of Preliminary Assessment of Compensatory Flood Storage Volumes**

Dear Mr. Lovely:

At the request of the U.S. Environmental Protection Agency (EPA), the General Electric Company (GE) has conducted a preliminary flood storage volume assessment for the portion of the Housatonic River 100-year floodplain between Newell Street and Lyman Street (Figure 1). Within this area, several GE projects have been completed or are anticipated to be performed pursuant to the October 2000 Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site or the related Definitive Economic Development Agreement (DEDA) among GE, the City of Pittsfield, and the Pittsfield Economic Development Authority (PEDA). Completed or anticipated activities associated with these projects primarily include building demolition, soil removal/filling, soil grading, and engineered barrier installation.

As part of this preliminary assessment, GE considered activities potentially affecting existing flood storage capacity within the following areas: City Recreational Area, 60s Complex, Newell Street Area I, Newell Street Area II, Lyman Street Area, ½ Mile Reach of the Housatonic River, East Street Area 2-South, Former Oxbow Areas A and C, and Former Oxbow Areas J and K. In addition to the above, GE separately considered compensatory flood storage gains and losses associated with the Thermal Oxidizer removal and the Building 68 Area Removal Action, which were completed prior to the finalization of the CD. The general locations of the activities included in this assessment, as well as their relation to the 100-year floodplain boundary, are shown on Figure 1.

The results of the preliminary flood storage volume assessment for these activities are summarized in Tables 1 and 2, which are separated into the activities performed under the CD or the DEDA and those performed prior to the CD. Table 1 summarizes the overall estimated changes to flood storage capacity on an area-by-area basis, while Table 2 provides details regarding flood storage gains and losses within each area on an incremental foot-by-foot basis.

As shown in Tables 1 and 2, GE anticipates an overall net gain of approximately 21,500 cubic yards (cy) in existing flood storage capacity once all CD- or DEDA-related activities within the 100-year floodplain have been completed. This excludes the approximately 2,500 cy yard net gain associated with the Thermal Oxidizer removal and the Building 68 Area Removal Action, which were completed prior to the CD.

The estimated flood storage volume gains and losses presented in the attached tables supersede those previously presented to EPA, including those presented in the Final Removal Design/Removal Action Work Plans for Newell Street Area II and the Lyman Street Area (submitted in March 2005 and September 2005, respectively). As shown in these tables, the losses in flood storage capacity associated with the installation of engineered barriers in the GE-owned parking lots in those areas will be more than offset by gains in flood storage capacity resulting from other projects within the 100-year floodplain.

Please note also that the results of the flood storage volume assessment provided herein are preliminary and are anticipated to be revised as additional activities are designed and completed and better estimates can be prepared. GE will submit the results of revised assessments to EPA as appropriate.

Please feel free to contact me if you have any questions regarding this letter or the attached information.

Sincerely,

Handwritten signature in blue ink that reads "Andrew T. Silfer / Acc".

Andrew T. Silfer, P.E.  
GE Project Coordinator

**Attachments**

V:\GE\_Pittsfield\_General\Correspondence\Floodplain Storage\38562196Ltr.doc

cc: Dean Tagliaferro, EPA  
Tim Conway, EPA  
Holly Inglis, EPA  
Rose Howell, EPA\*  
K.C. Mitkevicius, USACE  
Susan Steenstrup, MDEP (2 copies)  
Anna Symington, MDEP\*  
Jane Rothchild, MDEP\*  
Linda Palmieri, Weston (2 copies)  
Nancy E. Harper, MA AG\*  
Dale Young, MA EOE

Mayor James Ruberto, City of Pittsfield  
Pittsfield Conservation Commission  
Michael Carroll, GE\*  
Richard Gates, GE  
Roderic McLaren, GE\*  
James Nuss, BBL  
James Bieke, Goodwin Procter  
Public Information Repositories  
GE Internal Repository

*\*cover letter only*

**TABLE 1  
PRELIMINARY ESTIMATES OF CHANGES TO EXISTING FLOOD STORAGE CAPACITY - OVERALL SUMMARY<sup>1</sup>**

**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

**Actions Performed Under the Consent Decree or DEDA**

Area	Status	Estimated Flood Storage Gains		Estimated Flood Storage Losses		Estimated Net Storage Change (cy)
		Type	Volume (cy)	Type	Volume (cy)	
City Recreational Area	Complete	None	0	Soil Cover and Soil Grading	294	-294
60's Complex Demolition - Completed <sup>2</sup>	Complete	Building Demolition	19,408	None	0	19,408
Upper 1/2 Mile Reach	Complete	Riverbank remediation	183	None	0	183
Newell Street Area I	Ongoing	Building Demolition, Soil Grading	2,116	Engineered Barrier Installation, Installation of Bocce Courts	404	1,712
Newell Street Area II	Ongoing	Soil Grading	2,098	Engineered Barrier Installation (Parking Lot)	8,365	-6,267
Lyman Street Area	Future	None	0	Engineered Barrier Installation (Parking Lot)	11,223	-11,223
60's Complex Demolition - Future <sup>3</sup>	Future	Building Demolition	18,400	None	0	18,400
East Street Area 2 - South <sup>4</sup>	Future	None	0	Enhanced Pavement	403	-403
Former Oxbow Areas A and C <sup>5</sup>	Future	No Flood Storage Impacts Anticipated				
Former Oxbow Areas J and K	Future	No Flood Storage Impacts Anticipated				
		42,205		20,689		21,516 <sup>6</sup>

**Actions Performed Prior to the Consent Decree**

Area	Status	Estimated Flood Storage Gains		Estimated Flood Storage Losses		Estimated Net Storage Change (cy)
		Type	Volume (cy)	Type	Volume (cy)	
Thermal Oxidizer	Complete	Building Demolition	2,432	None	0	2,432
Building 68	Complete	Riverbank Removal	74	None	0	74
		2,506		0		2,506 <sup>6</sup>

**Notes:**

1. The flood storage information provided herein is associated with completed and anticipated projects located within the 100-year floodplain of the Housatonic River between the Newell Street and Lyman Street bridges.
2. Flood storage calculation includes demolition activities associated with Buildings 61, 61A, 61J, 61R, 61S, 62, 62 Shed, 64Y, 66, 66A, 66B, and 67.
3. Flood storage calculation includes demolition activities associated with Buildings 63, 63X, 65, and 68.
4. Assumes 3 inches of pavement over areas specified in the Conceptual RD/RA Work Plan. Calculations may need to be revised based on the scope of response actions to be presented in the Final RD/RA Work Plan.
5. The placement of riprap in the drainage channel at the storm outlet at Day Street may result in a de minimis loss in existing storage capacity.
6. GE intends to use excess flood storage capacity for other activities to be undertaken by GE in these areas in the future.

**TABLE 2  
PRELIMINARY ESTIMATES OF CHANGES TO EXISTING FLOOD STORAGE CAPACITY - INCREMENTAL ELEVATIONS<sup>1</sup>**

**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

**ESTIMATED FLOOD STORAGE GAINS BY ELEVATION (cy)**

Actions Performed Under the Consent Decree or DEDA									
Incremental Feet	City Recreational Area	60's Complex Demolition - Completed <sup>2</sup>	Upper 1/2 Mile	Newell Street Area I	Newell Street Area II	Lyman Street Area	60's Complex Demolition - Future <sup>3</sup>	East Street Area 2 - South <sup>4</sup>	Total
Less Than 982	0	0	183	0	16	0	0	0	199
982-983	0	0	0	0	313	0	0	0	313
983-984	0	0	0	0	128	0	0	0	128
984-985	0	9	0	41	727	0	179	0	956
985-986	0	2,593	0	0	914	0	2,954	0	6,461
986-987	0	2,945	0	0	0	0	3,393	0	6,337
987-988	0	3,039	0	421	0	0	3,393	0	6,852
988-989	0	3,111	0	498	0	0	3,393	0	7,001
989-990	0	4,762	0	770	0	0	3,393	0	8,925
990-991	0	2,922	0	385	0	0	1,696	0	5,003
991-992	0	28	0	0	0	0	0	0	28
<b>TOTALS</b>	<b>0</b>	<b>19,408</b>	<b>183</b>	<b>2,116</b>	<b>2,098</b>	<b>0</b>	<b>18,400</b>	<b>0</b>	<b>42,205</b>

Actions Performed Prior to the Consent Decree		
Thermal Oxidizer	Building 68	Total
118	74	192
244	0	244
276	0	276
276	0	276
276	0	276
276	0	276
276	0	276
276	0	276
276	0	276
276	0	276
138	0	138
0	0	0
<b>2,432</b>	<b>74</b>	<b>2,506</b>

**ESTIMATED FLOOD STORAGE LOSSES BY ELEVATION (cy)**

Actions Performed Under the Consent Decree or DEDA									
Incremental Feet	City Recreational Area	60's Complex Demolition - Completed <sup>2</sup>	Upper 1/2 Mile	Newell Street Area I	Newell Street Area II	Lyman Street Area	60's Complex Demolition - Future <sup>3</sup>	East Street Area 2 - South <sup>4</sup>	Total
Less Than 982	0	0	0	0	-81	0	0	-16	-97
982-983	0	0	0	0	0	-4	0	0	-4
983-984	0	0	0	-13	0	-432	0	0	-445
984-985	0	0	0	-68	0	-1,479	0	-47	-1,594
985-986	0	0	0	-107	0	-2,146	0	-62	-2,315
986-987	0	0	0	-213	-177	-2,004	0	-214	-2,608
987-988	0	0	0	-3	-1,450	-2,004	0	-12	-3,469
988-989	0	0	0	0	-1,898	-1,949	0	-26	-3,873
989-990	0	0	0	0	-1,915	-1,059	0	-26	-3,000
990-991	-204	0	0	0	-2,844	-145	0	0	-3,193
991-992	-91	0	0	0	0	0	0	0	-91
<b>TOTALS</b>	<b>-294</b>	<b>0</b>	<b>0</b>	<b>-404</b>	<b>-8,365</b>	<b>-11,223</b>	<b>0</b>	<b>-403</b>	<b>-20,689</b>

Actions Performed Prior to the Consent Decree		
Thermal Oxidizer	Building 68	Total
0	0	0
0	0	0
0	0	0
0	0	0
0	0	0
0	0	0
0	0	0
0	0	0
0	0	0
0	0	0
0	0	0
0	0	0
0	0	0
0	0	0
<b>0</b>	<b>0</b>	<b>0</b>

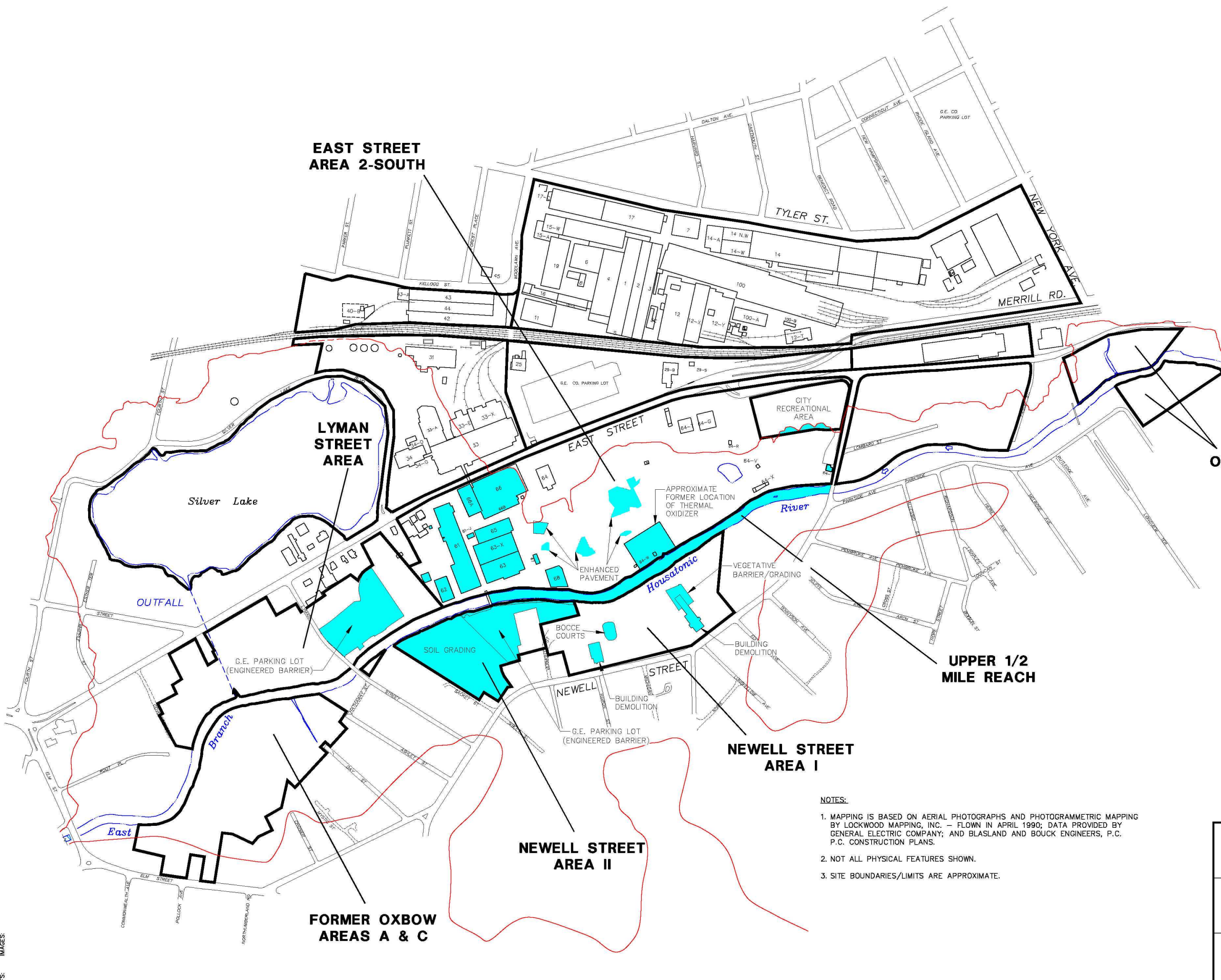
**ESTIMATED NET STORAGE CHANGE BY ELEVATION (cy)**

Actions Performed Under the Consent Decree or DEDA									
Incremental Feet	City Recreational Area	60's Complex Demolition - Completed <sup>2</sup>	Upper 1/2 Mile	Newell Street Area I	Newell Street Area II	Lyman Street Area	60's Complex Demolition - Future <sup>3</sup>	East Street Area 2 - South <sup>4</sup>	Total
Less Than 982	0	0	183	0	-65	0	0	-16	102
982-983	0	0	0	0	313	-4	0	0	309
983-984	0	0	0	-13	128	-432	0	0	-317
984-985	0	9	0	-27	727	-1,479	179	-47	-638
985-986	0	2,593	0	-107	914	-2,146	2,954	-62	4,146
986-987	0	2,945	0	-213	-177	-2,004	3,393	-214	3,729
987-988	0	3,039	0	418	-1,450	-2,004	3,393	-12	3,383
988-989	0	3,111	0	498	-1,898	-1,949	3,393	-26	3,128
989-990	0	4,762	0	770	-1,915	-1,059	3,393	-26	5,925
990-991	-204	2,922	0	385	-2,844	-145	1,696	0	1,811
991-992	-91	28	0	0	0	0	0	0	-62
<b>TOTALS</b>	<b>-294</b>	<b>19,408</b>	<b>183</b>	<b>1,712</b>	<b>-6,267</b>	<b>-11,223</b>	<b>18,400</b>	<b>-403</b>	<b>21,516<sup>5</sup></b>

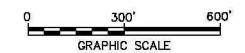
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276	0	276
138	0	138
0	0	0
<b>2,432</b>	<b>74</b>	<b>2,506<sup>5</sup></b>

- Notes:**
- The flood storage information provided herein is associated with completed and anticipated projects located within the 100-year floodplain of the Housatonic River between the Newell Street and Lyman Street bridges.
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- LEGEND:**
- AREAS INCLUDED IN PRELIMINARY FLOOD STORAGE VOLUME ASSESSMENT
  - APPROXIMATE LIMITS OF 100-YEAR FLOODPLAIN BOUNDARY
  - REMOVAL ACTION AREA BOUNDARY



- NOTES:**
1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1990; DATA PROVIDED BY GENERAL ELECTRIC COMPANY; AND BLASLAND AND BOUCK ENGINEERS, P.C. P.C. CONSTRUCTION PLANS.
  2. NOT ALL PHYSICAL FEATURES SHOWN.
  3. SITE BOUNDARIES/LIMITS ARE APPROXIMATE.

GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS	
<b>AREAS INCLUDED IN PRELIMINARY FLOOD STORAGE VOLUME ASSESSMENT</b>	
 an ARCADIS company	FIGURE <b>1</b>