



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

June 9, 2008

Mr. Michael T. Carroll, Manager  
Pittsfield Remediation Programs  
General Electric Company  
159 Plastics Avenue  
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's May 1, 2008 submittal titled *East Street Area 2-South Demolition and Disposition Activities - Buildings 63, 63X, and 68*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts

Dear Mr. Carroll:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's May 1, 2008 submittal titled *East Street Area 2-South Demolition and Disposition Activities - Buildings 63, 63X, and 68* (the "Demolition and Disposition Plan"). This letter 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, in consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the Demolition and Disposition Plan, subject to the following conditions:

1. GE shall properly characterize any building demolition debris to be disposed of off-site.
2. This letter does not constitute approval or disapproval of the characterization of building demolition debris or other material for off-site disposal, nor does it constitute approval or disapproval of GE's building demolition activities themselves. During demolition and disposition activities, GE shall comply with all applicable federal, state and local laws, requirements, regulations, and ordinances.
3. Any placement of material in the Hill 78 OPCA is subject to the volume limitations of the Hill 78 OPCA, the other OPCA-related performance standards and requirements of the CD and the SOW, and the requirements of the OPCA Work Plans, as conditionally approved by EPA.
4. For the material placed into the Hill 78 OPCA, GE shall provide for a relatively even placement of building debris (brick, concrete, steel, etc.) to facilitate proper compaction, and

shall ensure that the maximum size of any material placed into the Hill 78 OPCA is less than three feet in its largest dimension.

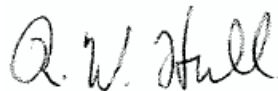
5. Any materials generated for disposal from the abandonment or relocation of utilities associated with the demolition of buildings 63, 63X and 68 shall be characterized and disposed in accordance with GE's March 2007, Project Operations Plan (POP). If GE considers the re-use of excavated material associated with the abandonment or relocation of utilities, it shall conduct characterization sampling, also in accordance with the POP, and shall ensure that the spatial average PCB concentration of the backfill material re-used for any subgrade utilities does not exceed 25 ppm.
6. GE shall provide an estimate of the total volume of material to be disposed in the Hill 78 OPCA.
7. GE shall identify the measure it will implement to address any vaults, pits and tunnels discovered during the demolition activities associated with buildings 63, 63X and 68. At a minimum, GE shall fill any vaults, pits and tunnels to grade.
8. In its December 12, 2007, Addendum to Conceptual RD/RA Work Plan for ESA2-S, Figure F-1 identified storm and sanitary sewer lines associated with buildings 63, 63X and 68, and indicated that these lines would be removed from service in conjunction with future demolition activities at the 60s complex. EPA requests that GE identify the measures it will implement to address these utilities as well as any floor drains within the buildings. EPA recommends that, at a minimum, GE flush the sanitary sewer lines and grout the entire length of the sanitary sewer line.

Within 15 days of the date of this letter, GE shall provide an Addendum to the Demolition and Disposition Plan addressing 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,



Richard W. Hull  
GE Facility Project Manager

cc:

Dean Tagliaferro, EPA  
John Kilborn, EPA  
Tim Conway, EPA

Pittsfield Commissioner of Public Health  
Tom Hickey, Director, PEDDA  
Rod McLaren, GE

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