



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted Via Overnight Courier*

June 13, 2008

Mr. Richard Hull  
Remedial Project Manager  
USEPA – Region 1  
1 Congress Street (HBO), Suite 1100  
Boston, MA 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
East Street Area 2-South (GEC150)  
Addendum to May 1, 2008 Demolition and Disposition Activities – Buildings 63, 63X, and 68**

Dear Mr. Hull:

On May 1, 2008, the General Electric Company (GE) submitted a letter to the U.S. Environmental Protection Agency (EPA) describing its plans for demolition of Buildings 63, 63X, and 68 at GE's Pittsfield facility and seeking EPA's approval for disposition of certain building demolition debris at GE's Hill 78 On-Plant Consolidation Area (OPCA). EPA provided conditional approval of that submittal on June 9, 2008. As directed by EPA, GE has prepared this letter as an addendum to its May 1, 2008 submittal. This letter sets forth below GE's responses to the conditions in EPA's letter in which EPA requested additional information.

**EPA Condition 6:**

*GE shall provide an estimate of the total volume of material to be disposed in the Hill 78 OPCA.*

**GE Response:**

GE estimates that the total volume of material to be disposed of in the Hill 78 OPCA is approximately 4,000 cubic yards. This material will come from Buildings 63 and 63X.

**EPA Condition 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.*

**GE Response:**

GE will fill any subsurface voids, such as vaults, pits, and tunnels, with imported gravel borrow and restore the final surface to match surrounding conditions (e.g., asphalt or concrete pavement).

**EPA Condition 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.*

**GE Response:**

Storm and sanitary sewer lines (including floor drains located within the buildings) scheduled to be removed from service in conjunction with the Buildings 63, 63X, and 68 demolition activities (as identified in GE's December 12, 2007 *East Street Area 2-South Addendum to Conceptual Removal Design/Removal Action Work Plan*) will be filled with non-shrink grout, and associated pipe openings will be sealed with mechanical plumbers plugs. Sanitary sewer lines will also be flushed.

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

Sincerely,



Michael T. Carroll  
Manager, Pittsfield Remediation Programs

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|-----|--------------------------------------|---------------------------------|
| cc: | D. Tagliaferro, EPA                  | J. Bernstein, BCK Law           |
|     | T. Conway, EPA                       | T. Bowers, Gradient             |
|     | J. Kilborn, EPA                      | R. McLaren, GE                  |
|     | H. Inglis, EPA                       | A. Silber, GE                   |
|     | R. Howell, EPA                       | R. Gates, GE                    |
|     | S. Steenstrup, MDEP (2 copies)       | J. Bieke, Goodwin Procter       |
|     | J. Rothchild, MDEP                   | S. Gutter, Sidley Austin        |
|     | A. Symington, MDEP                   | J. Nuss, ARCADIS                |
|     | K.C. Mitkevicius, USACE              | GE Internal Repositories        |
|     | L. Palmieri, Weston (2 copies)       | Public Information Repositories |
|     | Mayor J. Ruberto, City of Pittsfield |                                 |
|     | T. Hickey, Director, PED A           |                                 |