



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

April 13, 2006

Mr. Andrew 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 September 7, 2005 *Hill 78 Area – Remainder Pre-Design Investigation Report*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's September 7, 2005 *Hill 78 Area – Remainder Pre-Design Investigation Report* (the Report). 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, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the September 7, 2005 Report, subject to the following conditions:

1. Page 1-4, par 1 - GE shall clarify whether this investigation was conducted before or after the "clean" (i.e., less than 1 ppm PCBs, etc.) fill material was placed, estimate the volume of fill placed, and more clearly define the area it was placed. Further, GE shall clarify how this "clean" fill will be evaluated in the Conceptual Removal Design/Removal Action evaluation, especially if additional fill continues to be placed over time, since the ground surface from which depth increments are measured will change.
2. Page 1-4, par 2 and Page 1-5, par 1 - GE shall revise the text of the next submittal to be consistent with page 18 of the SOW, such that the maximum horizontal extent of the Hill 78 Consolidation Area (including the final cover, but not including adjacent ancillary facilities) shall not exceed approximately 5.6 acres, or approximately 6.0 acres following the proposed footprint shift; and that the maximum horizontal extent of the Building 71 Consolidation Area (including the final cover, but not including adjacent ancillary facilities) shall not exceed approximately 4.4 acres. In addition, GE shall revise the text of the next submittal, and include appropriate figures, to clarify that the proposed

footprint shift of the Hill 78 OPCA (that will retain the tree buffer between the OPCA and Allendale School) will extend beyond the previously proposed southwest extension to cover four anomalies observed during 2001-2002 geophysical survey work.

3. Page 2-5 - GE shall check the following and revise the text of the next submittal as appropriate:

- Total PCB results for RAA9-I5, 6-15', is ND (0.037) per Table 1, not 0.12 as reported in the text.
- Total PCB results for RAA9-H15, 6-10', are not included in Table 1.
- Depth increment for RAA9-H16 is 6-15' per Table 2, not 0-15' as reported in the text.

4. Page 2-5, par 3 - GE shall collect a soil sample for Appendix IX+3 constituents in the 6-15' depth increment at location RAA9-I14, approximately mid way between RAA9-H16 and RAA9-I12, to provide an even spatial distribution of samples for Appendix IX+3 constituents from this depth increment.

5. Page 2-7 - EPA does not agree that the deteriorated parking lot was adequately characterized. Therefore, as outlined in EPA's July 22, 2004 conditional approval letter and based on recent discussions with GE, GE shall sample and analyze soil beneath the parking lot for PCBs and Appendix IX+3 constituents by applying a grid at the frequency required for "unpaved industrial GE-owned areas."

6. Section 2.6.4 - On Figure 2 and in the legend, GE shall more clearly identify the 30' section of sanitary sewer that was inspected (similar to how the storm sewer is identified). GE shall identify the disposal plans for the materials cleaned from both lines. After being cleaned, GE shall re-vidiotape the entire lengths of both lines. GE shall perform a desktop evaluation to assess the potential for any future damage (e.g., collapse) of both lines once Hill 78 has reached its final capacity, including final cover construction and long-term consolidation effects; the assessment shall include an evaluation of the structural design criteria for the integrity of each type of pipe and connection/joint. GE shall complete the sewer line field activities as soon as possible and provide the results in the Supplemental Data Letter, or sooner, if available.

7. Section 2.6.4 - GE shall collect the following samples to determine whether any Hill 78 contaminants have entered the storm sewer and have migrated off the RAA in either the north or south directions and to determine whether erosion from swales A and/or B is transporting contaminants (such as PAHs and PCBs) off-site and to the Housatonic River via the city storm sewer (see attached map):

- One surface water and one sediment sample for PCBs and Appendix IX+3 constituents from storm sewer manhole MHD2 located upstream of the Hill 78 OPCA, but downstream of Allendale School;
- One sediment sample for PCBs and Appendix IX+3 constituents from the sediment deposit blocking a portion of the storm sewer under the Hill 78 OPCA;
- Three surface water samples for PCBs and Appendix IX+3 constituents, one each

from the upstream portion of swales A and B, and a third just downstream of the confluence of swales A and B, but before the surface water enters an underground pipe near the fence line;

- Four sediment samples for PCBs, two each from swales A and B, equally spaced with existing swale samples RAA9-K12E and RAA9-L15, and one sample from each swale for Appendix IX+3 constituents.

8. Page 3-2 – GE shall develop an overall detailed site map for Hill 78 Area-Remainder that will be full size so sample IDs are legible in the next submittal.

GE shall submit a Supplemental Sampling Proposal proposing the sampling discussed in comments 4, 5, and 7 of this letter within 30 days of the date of this letter. That Supplemental Sampling Proposal shall propose a revised time for submission of the Supplemental Data Letter that provides the information described in Section 3.3 of the Report and addresses the conditions in this letter. EPA reserves its right to perform additional sampling 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) 918-1328.

Sincerely,

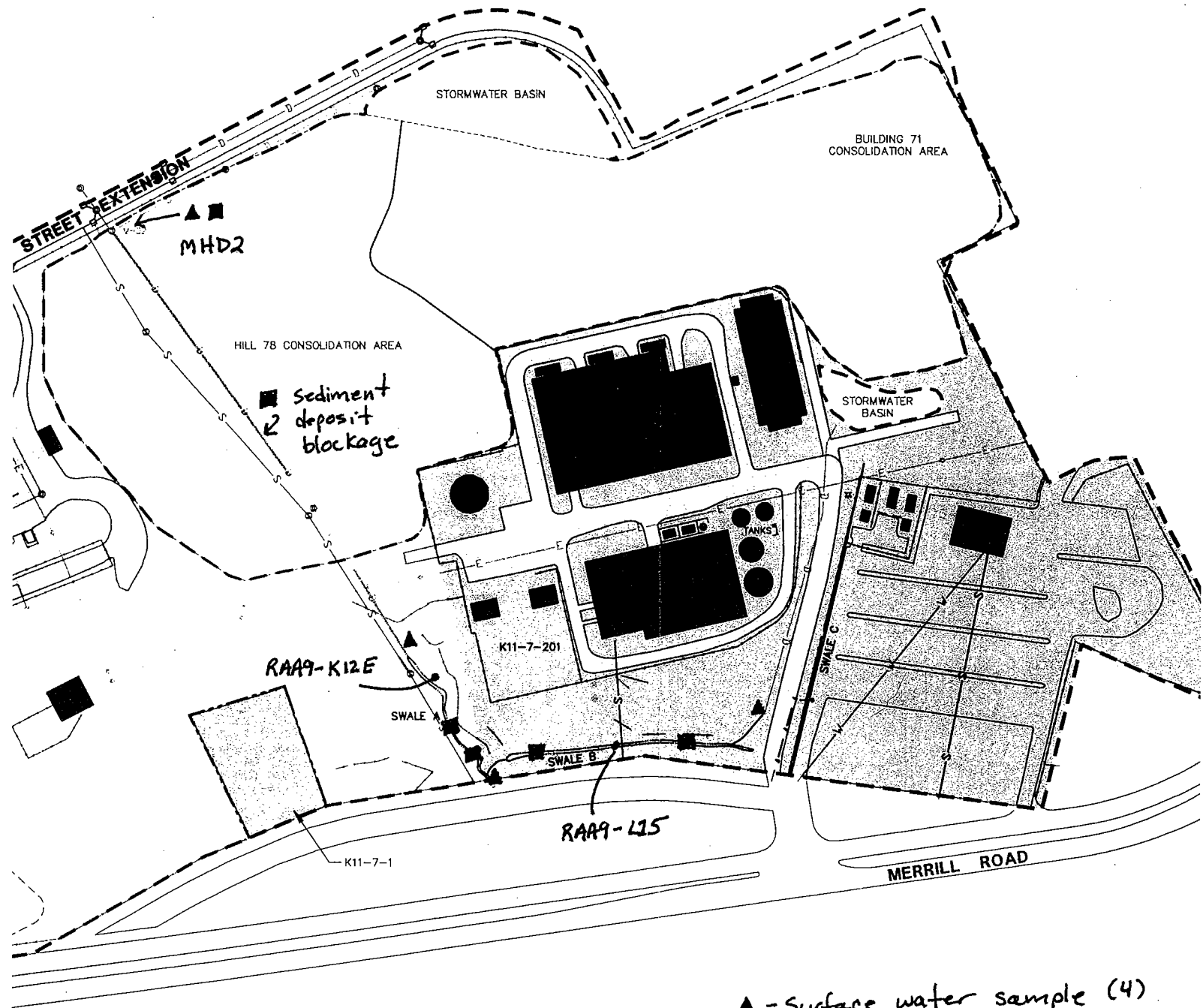


Sharon M. Hayes
GE Facility Project Manager

cc:

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Pittsfield Department of Health	
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Map for Condition # 7



- ▲ - Surface water sample (4)
- - sediment sample (6)
- Approximate locations