



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

April 26, 2007

Mr. Richard W. Gates, Remediation Project Manager
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 February 16, 2007, *Hill 78 Area-Remainder Supplemental Sampling Proposal*, and March 20, 2007, *Hill 78 Area-Remainder Second Supplemental Data Letter*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's February 16, 2007, *Hill 78 Area-Remainder Supplemental Sampling Proposal* (the "Sampling Proposal") and March 20, 2007, *Hill 78 Area-Remainder Second Supplemental Data Letter* (the "Data Letter"). 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 February 16, 2007, Sampling Proposal and the March 20, 2007, Data Letter, subject to the following conditions:

Sampling Proposal

1. As required by the SOW, in order to collect and analyze samples for Appendix IX+3 constituents that are evenly distributed between surface and subsurface soils, GE shall collect and analyze samples for Appendix IX+3 constituents from the seven proposed soil borings at the following frequency and depth intervals: three at 0-1 foot, two at 1-6 feet, and two at 6-15 feet.
2. GE shall collect, and analyze for Appendix IX+3 constituents, one sample each from sampling location RAA9-I2 (0-1 foot) and RAA9-G2S (0-1 foot).
3. It appears that transects I6, D9, and C11 were not previously characterized. In the case of transects D9 and C11, they may have previously been located within the footprint of the OPCA. GE shall characterize soils at grid transects I6, D9, and C11, for PCB and Appendix IX+3 constituents using either existing data or new soil samples as follows:

- a. additional sampling shall be conducted at grid transect I6 to characterize PCBs at the 0-1 foot, 1-6 foot, and 6-15 foot depth increments and Appendix IX+3 constituents at the 1-6 foot depth increment;
- b. additional sampling shall be conducted at grid transect D9 to characterize PCBs at the 0-1 foot, 1-6 foot, and 6-15 foot depth increments and Appendix IX+3 constituents at the 1-6 foot depth increment; and
- c. existing data from boring locations DRA-SB-8 and OPCA-1 may be utilized at grid transect C11 to characterize PCBs at the 0-1 foot (DRA-SB-8 and OPCA-1), 1-6 foot (OPCA-1), and 6-15 foot (OPCA-1) depth increments and Appendix IX+3 constituents at the 0-1 foot (OPCA-1) depth increment.

Data Letter

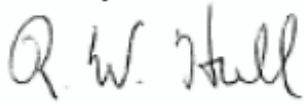
4. GE shall adjust Figure 1 from the Data Letter to more accurately represent utility corridors. Specifically, Figure 1 shall be adjusted as follows:
 - a. Mapping of the storm sewer utility corridors along Tyler Street Extension shows the corridors stopping at the north side of the street in the vicinity of sampling grid transects 7 through 13, and 2 and 3, when they should extend beyond the northern edge of the street. The utility corridor in this vicinity should also be expanded to incorporate any storm and sanitary sewers originating from the border with the Allendale School property and extending under Tyler Street extension.
 - b. It is not clear from Figure 1 whether the catch basin located south of sampling location RAA9-X3S is connected to storm sewers that extend from within the boundaries of the RAA. Also, mapping of the storm sewer utility corridor in the vicinity of sampling grid transect 17 along Old Merrill Road should be adjusted to incorporate the catch basin located north of sampling location RAA9-X3 and to extend to the boundary of the RAA.
 - c. The utility corridor in the south-west corner of the RAA, in the vicinity of grid transect N7, should be extended east to the border of the RAA to fully incorporate the storm sewer utility running along the border of the RAA.

GE shall conduct the sampling described in the Sampling Proposal as conditioned by 1, 2, and 3 above. GE shall submit the analytical results, along with a figure revised in accordance with condition 4 above, within 75 days of the date of this Conditional Approval Letter. In that submission, GE shall propose a schedule for the submittal of a Conceptual RD/RA Work Plan for the Hill 78 Area-Remainder Removal Action.

EPA reserves its 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:

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