



GE
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USA

Transmitted via Overnight Courier

December 17, 2007

Mr. Richard Hull
U.S. Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
Hill 78 Area-Remainder (GEC160)
Results of Data Needs Assessment**

Dear Mr. Hull:

On July 27, 2007, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a document titled Third Supplemental Data Letter summarizing the results of additional field activities conducted at the Hill 78 Area-Remainder Removal Action Area (RAA) in accordance with the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site and the accompanying Statement of Work for Removal Actions Outside the River (SOW). The Third Supplemental Data Letter also contained a proposed schedule for the assessment of remaining data needs and the submittal of a Conceptual RD/RA Work Plan for the Hill 78 Area-Remainder RAA. That proposed schedule was modified by EPA in its October 18, 2007 conditional approval letter related to the Third Supplemental Data Letter.

As discussed below, GE has initiated detailed RD/RA evaluations and, based on the results of the evaluations performed to date, no further data needs have been identified. Therefore, this letter confirms the EPA-approved schedule for submittal of a Conceptual RD/RA Work Plan for the Hill 78 Area-Remainder RAA.

I. Status of RD/RA Evaluations and Results of Data Needs Assessment

Since submittal of the Third Supplemental Data Letter, GE has initiated several RD/RA activities. Specifically, GE has identified the necessary evaluation areas and initiated preliminary assessments of current soil conditions with respect to PCB and other Appendix IX+3 constituents. A general summary of these activities is presented below.

For PCBs, RD/RA activities are being conducted based on the procedures outlined in Technical Attachment E of the Statement of Work for Remedial Actions Outside of the River (SOW). The results of the evaluations conducted to date indicate that some remediation will be necessary to achieve the applicable Performance Standards. However, the available data set appears sufficient to identify the extent of such remediation, such that no specific PCB-related data needs have been identified at this time. This finding will be confirmed as the detailed RD/RA evaluations proceed.

For Appendix IX+3 constituents other than PCBs, RD/RA assessment activities are being conducted based on the procedures outlined in Technical Attachment F of the SOW. Based on the results of the initial evaluation steps, it is anticipated that a site-specific risk assessment (as allowed for in the SOW) will be performed and the evaluation will demonstrate that no remediation will be needed to achieve the applicable Performance Standards. As such, no such additional data needs related to Appendix IX+3 have been identified at this time.

Based on the above, GE will continue with RD/RA evaluations for Hill 78 Area-Remainder and the preparation of the Conceptual RD/RA Work Plan. Although it is not anticipated that there are any current soil-related data needs, the detailed and final technical evaluations for this RAA have not yet been completed. As a result, some data needs may be identified as the RD/RA evaluations are completed. In that event, GE will identify proposed sampling activities in the Conceptual RD/RA Work Plan.

II. Future Activities

In its October 18, 2007 conditional approval letter for the Third Supplemental Data Letter, EPA indicated that the Conceptual RD/RA Work Plan for Hill 78 Area-Remainder should be submitted within four months of that letter – i.e., by February 18, 2008, assuming that no additional data needs are identified. As described in this letter, GE has initiated several of the activities toward preparation of a Conceptual RD/RA Work Plan and, based on the current status of these evaluations, no further soil sampling data appear necessary. Therefore, GE anticipates submittal of the Conceptual RD/RA Work Plan by February 18, 2008.

Please call Andrew Silfer or me if you have any questions about this data letter or the upcoming activities at the Hill 78 Area-Remainder RAA.

Sincerely,



Richard W. Gates
Remediation Project Manager

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