



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

April 23, 2008

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 15, 2008, *Hill 78 Area–Remainder Conceptual RD/RA Work Plan*, 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 15, 2008, *Hill 78 Area–Remainder Conceptual RD/RA Work Plan* (the "Work Plan"). This submittal 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 Work Plan, subject to the following conditions:

1. GE may remove any of the material previously placed in the southwest corner of the Removal Action Area ("RAA"), only after an Environmental Restriction and Easement ("ERE") is recorded for this RAA and only in compliance with such recorded ERE. GE shall no longer place any material generated from the site within the designated fill area without EPA approval.
2. GE shall revise Figure 1-2 to depict the boundary of the general area in the southwest corner of the RAA that has been subject to the placement of fill material.
3. GE shall revise Figure 1-2 to show the two storm water basins associated with the OPCAs, as indicated in the text of Section 1.2.
4. GE shall revise Section 2.2 to reflect that pre-design soil investigations were conducted between October 20, 2004 and July 5, 2007. The sample collected from location RAA9-A13N was collected on July 5, 2007.

5. As indicated in the SOW, the standard of less than 10 ppm of PCBs in the top 3 feet of soil in utility corridors applies to recreational properties and appears to be incorrectly cited on page 14 of the Work Plan. GE shall provide an explanation of how this standard was evaluated for the utility corridors within the Hill 78 Area Remainder.
6. GE shall revise Figure B-33 to include the soil sample locations within the realigned storm and sanitary sewer corridor and table B-21 to include the analytical results for these soil samples.
7. GE shall revise Figure B-33 to correctly represent utility corridors and address any discrepancies between this figure and Figure 1 of GE's July 27, 2007, *Hill 78 Area-Remainder Third Supplemental Data Letter*. Specifically, GE shall review, and if necessary, adjust the utility corridors in the vicinity of grid transect N7, along Tyler Street Extension, and in the vicinity of grid transect I7 along the south side of the RAA boundary.
8. In the Final RD/RA Work Plan, GE shall determine if the "generating facility area" as evaluated in the Conceptual RD/RA Work Plan corresponds to the area as sold. If the areas are different, then GE shall reevaluate the area and propose for EPA approval additional response actions, if necessary.
9. GE shall consider the recent comments provided by EPA, and implemented by GE, regarding the East Street Area 2-North SIP, relative to contractor plans and the operations plan.
10. In accordance with condition #1 of EPA's October 22, 2007, CAL for GE's October 5, 2007, *Addendum to Supplemental Sampling and Engineering Design Report for Re-routing of Sanitary and Storm Sewer Pipelines*, GE is required to prepare a tree restoration plan following the rerouting of the storm and sanitary sewers and the remaining phase III final cover operations for the Hill 78 OPCA. That plan shall also include any restoration that may be required as a result of the remediation activities for the Hill 78 Area-Remainder RAA.
11. Figure 2-1 shows a number of "GE-Owned Paved Areas" that either are very small or are surrounded by numerous samples (for example, the concrete pads by substation 14-E and the eastern end of Tyler Street Extension). Conversely, Figure 2-1 shows a number of areas as "unpaved" that appear to be sampled on a paved frequency (for example, the electric switch yard and fuel oil storage tank area on Parcel K11-7-201). GE shall consider revising the spatial averaging tables to include as many areas as "unpaved" as possible for the purpose of meeting the Performance Standards and for the Grants of Environmental Restrictions and Easements. If a currently paved area can meet unpaved performance standards, GE's future inspection, maintenance, and surveying costs will be reduced, and the ERE will be less restrictive. Areas that are considered unpaved for Performance Standard and ERE purposes can remain as paved. As an exception to the foregoing, GE shall pave and keep paved the OPCA

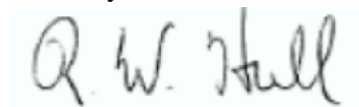
access road located to the south of Hill 78. Such road shall be a "paved" area under the ERE. GE shall provide a figure showing the extent of the areas that GE has considered "paved" and "unpaved" for the purposes of spatial averaging and the EREs.

GE shall submit a Final RD/RA Work Plan for the Hill 78 Area-Remainder Removal Action within 60 days of the date of this letter. The Final RD/RA Work Plan shall address the conditions contained in this letter.

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:

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