

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

May 22, 2007

Mr. Richard W. Gates 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 27, 2007 submittal titled Plant Site 1 Groundwater Management Area NAPL Monitoring Report for Fall 2006, GE-Pittsfield/Housatonic River Site

Dear Mr. Gates:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *NAPL Monitoring Report for Fall 2006* (the Report). The Report 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 Report, the proposed NAPL monitoring, and the other actions described therein, subject to the following conditions.

- 1. EPA reserves the right to require GE to install replacement wells for any well that was included in the baseline monitoring program and is abandoned prior to submittal and approval of a long-term control plan, including those wells damaged or abandoned due to PEDA construction activities.
- 2. The Report attributes the need for a re-survey of well HR-G3-MW-1 to previous anomalous data which indicated an apparent hydraulic depression. The tabulated data (Table 6) indicates an approximately 4-ft lower elevation than the data shown in Figure 13. GE shall provide an explanation for this differing information, or shall provide corrected tables and/or figure. Also, the statement regarding the anomalous data and the hydraulic depression shall either be confirmed or corrected depending on the response to this condition. If necessary to evaluate the anomalous data, GE shall inspect the physical condition of the well, re-survey the well, and furnish revised data tables and figures in an addendum to this Report.
- 3. Figure 14 in the Report shows well N2SC-09S in two different locations. This well is described as having anomalous data and subject to re-survey (note that the elevation

given in the figure appears anomalous in both locations). GE shall provide an edited figure that shows the well in its correct location and edited tables that include data for this well. The characterization of the well data as anomalous shall also be re-addressed with regard to the corrected figure and tables. If necessary to evaluate the anomalous data, GE shall inspect the physical condition of the well, re-survey the well, and furnish revised data tables and figures in an addendum to this Report.

4. The elevation of well NS-10 given in Figure 14 appears to be approximately 2.3 ft lower than the depicted groundwater contours. GE shall provide an explanation for this apparent anomalous data. If necessary to evaluate the anomalous data, GE shall inspect the physical condition of the well, re-survey the well, and furnish revised data tables and figures in an addendum to this Report.

GE shall provide the information required in conditions 2, 3, and 4 in an addendum to this Report within 60 days for receipt of this letter.

EPA reserves all of its rights under the CD, including 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) 918-1721.

Sincerely,

Richard Fisher

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GE Facility Project Manager

cc:

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