



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

April 8, 2008

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 January 30, 2008 submittal titled Plant Site 1 Groundwater Management Area, *Groundwater Quality Monitoring Interim Report for Fall 2007*, GE-Pittsfield/Housatonic River Site

Dear Mr. Gates:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Groundwater Quality Monitoring Interim Report for Fall 2007* (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 (MassDEP), approves the Report and the proposed Spring 2008 groundwater monitoring described therein, subject to the following conditions.

1. GE states that the groundwater samples were collected by the low-flow techniques specified in the FSP/QAPPP. The low-flow techniques specified in the FSP are dependent on the accurate measurement of stabilized water quality parameters. The pH and temperature for the groundwater reported for several of the monitoring wells was elevated over and above that which would be expected for groundwater (e.g. approximately 14°C and 11 S.U.). For future sampling events, GE shall bring the means to shelter (e.g. umbrella) the sampling equipment such that the effect of sunlight can be minimized.

For future sampling events where the stabilized pH in the monitoring wells is determined to be elevated (>8.5 S.U.), GE shall:

1. Ensure that field staff brings redundant equipment and/or pH paper into the field so that monitoring equipment can be ruled out as a factor.
2. Ensure that field staff brings pH buffer solutions to check and record equipment calibration in the field. A check of the calibration shall be recorded in the field notes following sampling at each well where the pH deviates, at a minimum, from the range of 5.0 S.U. to 8.5 S.U.

If the pH is still determined to be elevated after checking equipment calibration and using redundant equipment, then GE shall determine if the groundwater in the GMA has become caustic, if the sample collection equipment and/or method is affecting the sample, or if the sampling well is effecting pH measurement. GE shall then propose appropriate corrective measures as necessary.

GE shall discuss any instances where the stabilized sample pH deviates from the range of 4.5 S.U. to 9.0 S.U. in the subsequent monitoring report. The analytical data from any such wells shall be evaluated and qualified or rejected for pH-sensitive parameter groups (if necessary), unless GE demonstrates that the reported pH is representative of the groundwater in the area of the well.

2. Table 1 states that well GMA1-25 may be damaged. GE shall investigate the reasons that a submersible pump could not be used at this monitoring well – including whether an object is stuck in the well, whether the well is damaged, whether the screen is compromised, and whether any damage could be compromising the collection of a representative sample. GE, with EPA concurrence, shall take appropriate corrective actions to ensure that proper samples can be collected from this well. If the well is beyond repair, a new well may be required. EPA oversight information indicates that this well may have been damaged by equipment during fill operations in June 2006. Note that analysis of samples from this well has indicated extremely elevated pH as discussed in Condition 2. GE shall report on this investigation in the next monitoring report.

3. GE states that no additional supplemental sampling is proposed at wells LSSC-8S or LSSC-18. EPA notes that these two wells will remain in the interim monitoring program, and will be sampled in accordance with Table 8 of the Report.

4. Several applicable groundwater quality standards have been modified in the Massachusetts Contingency Plan (MCP) in February 2008. GE shall include a discussion on this subject in the forthcoming interim monitoring report for the Spring 2008 sampling event.

If you have any questions, please contact me at (617) 918-1721.

Sincerely,



Richard Fisher
GE Facility Project Manager

cc:

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