



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

May 23, 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 February 27, 2008 submittal titled Groundwater Management Area 1, *NAPL Monitoring 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 *NAPL Monitoring 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. Demolished buildings that are referred to for the purpose of locating the existence or former existence of NAPL or for locating a NAPL source, shall be included on the drawings in future reports. On these drawings, these buildings shall be specified as "former." Examples of these building references include Building 42 on page 8, Building 3C on page 11, and Building 69 on page 11.
2. GE shall include a table in all forthcoming NAPL reports detailing which monitoring wells have been previously tested for NAPL recovery during the GMA-1 NAPL monitoring program, including test dates, summarized results, and a reference to the NAPL monitoring report where detailed results were presented.
3. To provide a clearer understanding of the NAPL manual recovery criteria and other NAPL-related criteria for NAPL recovery testing and the installation of automated recovery systems, GE shall add a new section to future reports, identifying the NAPL related criteria that are currently being used on this project. A Section 2.5 could be added to the report describing these NAPL-related procedures.

4. GE shall evaluate the changing thickness of the LNAPL in monitoring wells GMA1-15, -16, and -19 relative to the operation of and recovery from RW-4 over time. The results shall be reported in future fall NAPL monitoring reports.
5. To better clarify the representations of the NAPL plumes shown in the reports, future versions of Figures 11 and 12 shall identify the monitoring points utilized to draw the extent of NAPL plumes. This could be done by adding a color for wells which were measured, but where no NAPL was observed.
6. In future GMA 1 NAPL reports, GE shall plot the NAPL extent from the prior same-season monitoring period (i.e., illustrate the NAPL extent from the prior spring in the spring NAPL reports and compare with the prior fall in the fall NAPL reports) on the figure showing the NAPL extent from the current monitoring period (e.g., Figures 11 and 12 in the Report).
7. EPA notes that the last two NAPL monitoring reports (Spring and Fall of 2007) have provided conflicting information concerning Newell Street Area II monitoring wells NS-15R, N2SC-07, and N2SC-07S. To clarify the status of wells in this area, GE has stated that:
 - a. Well NS-15R has been destroyed and will not be replaced. DNAPL monitoring in this area will be covered by wells NS-30 and N2SC-07.
 - b. Well N2SC-07S has been located and, along with new well NS-9R, will provide groundwater elevation and LNAPL monitoring points at this location near the river.

In future NAPL monitoring reports, GE shall continue to discuss wells that were not found, were unusable, or were otherwise not monitored during the prior six-month period. If necessary, GE shall propose additional wells to be monitored as replacements in the NAPL monitoring program or the installation of new wells.

EPA reserves all of its rights under the Decree, 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 Decree.

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

Sincerely,



Richard Fisher
GE Facility Project Manager

cc:

Dean Tagliaferro, US EPA
Tim Conway, US EPA

Mike Carroll, GE
Andrew Silber, GE

John Kilborn, US EPA
Rose Howell, US EPA
Holly Inglis, USEPA
T. Angus, MDEP
Susan Steenstrup, MDEP
Anna Symington, MDEP
Jane Rothchild, MDEP
Joanne Flescher, MDEP
N. Harper, MA AG
Public Information Repositories
Christopher Ferry, ASRC

Rod McLaren, GE
James Bieke, Goodwin Procter
James Nuss, Arcadis
J. Ciampa, SPECTRA
Dale Young, MA EOEEA
Mayor James Ruberto, City of Pittsfield
K.C. Mitkevicius, USACE
Pittsfield Commissioner of Public Health
Linda Palmieri, Weston Solutions
Tom Hickey, Director, PEDDA