



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

October 9, 2007

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: EPA Conditional Approval of General Electric's June 15, 2007, submittal titled *Groundwater Management Area 2 Baseline Assessment Final Report and Long-Term Monitoring Program Proposal*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's June 15, 2007, submittal titled *Groundwater Management Area 2 Baseline Assessment Final Report and Long-Term Monitoring Program Proposal (the "Report")*. This letter 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, in consultation with the Massachusetts Department of Environmental Protection, approves the Report based on the following conditions.

1. GE shall include, as an element of its Long-Term Monitoring Program (LTMP), an assessment of the extent and concentration of PCBs and VOCs historically detected in wells at GMA 2 relative to monitoring results from the portions of GMA 1 and GMA 4 which are adjacent to and upgradient of GMA 2. The assessment shall include a determination of the relationship between the GMAs relative to groundwater flow and PCB and VOC concentrations and the need for any modifications to the LTMP.
2. EPA disagrees with GE's conclusion that no clear increasing or decreasing trends are evident in the data. Specifically, EPA has identified the following trends:
 - a. TCE results from monitoring well OJ-MW-2 show greater monitoring results from fall monitoring rounds versus the results from the spring monitoring rounds as well as showing an upward trend over time when the fall and spring results are considered separately.
 - b. TCE results from monitoring well GMA2-6 show an increasing trend when observed individually.

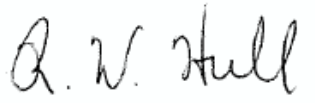
- c. PCB results from monitoring wells GMA2-2 and J-1R show a general increase relative to equilibrium.
 - d. Concentrations of dissolved PCBs from monitoring wells GMA2-4 and GMA2-9 exceeded the MCP GW-3 standards during the fall 2003 and fall 2005 monitoring periods.
3. GE shall include monitoring well OJ-MW-2 in the LTMP for VOCs. GE shall also establish a new well upgradient and within 30 feet of the building located to the east of well GMA2-6 and shall sample the new well for VOCs as a GW-2 compliance point within the LTMP.
4. Attachment H to the Statement of Work (SOW) requires that GE develop Method 2 standards for constituents for which Method 1 standards do not exist. Table B-1 of the Report indicates that, while most wells showed non-detectable concentrations of cobalt and copper, cobalt was detected in monitoring wells GMA2-2, GMA2-5, GMA2-6 and MW-2 and copper was detected in monitoring wells GMA2-1 and GMA2-4. However, Section 4.9.5 of the Report does not discuss the detections of cobalt and copper or make any comparisons to calculated Method 2 GW-3 Standards or explain why such standards were not calculated. GE shall discuss the baseline analytical results for cobalt and copper and either develop Method 2 standards for these two constituents or explain why such standards are not necessary.
5. GE shall classify monitoring well GMA2-1 as a GW-3 compliance point in addition to a GW-3 Perimeter upgradient well. Groundwater in the vicinity of monitoring well GMA2-1 may flow into the ditch adjacent to the well and then directly into the river. Therefore, GE shall compare analytical results from this well directly against GW-3 Performance Standards.

GE shall commence implementation of the LTMP, as conditioned by this letter, in fall 2007. EPA recognizes that it may not be possible to install the new well described in condition 3 in time for its inclusion in the fall 2007 sampling event, in which case GE shall install and develop that well in time to monitor it as part of the spring 2008 LTMP sampling event. GE shall address each of the conditions above in the Fall 2007 Monitoring Event Evaluation Report for GMA 2 to be submitted within 60 days following receipt of the final analytical data packages for the fall 2007 sampling event.

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,

A handwritten signature in black ink that reads "R. W. Hull". The signature is written in a cursive style and is positioned to the left of a vertical line.

Richard W. Hull
GE Facility Project Manager

cc:

Dean Tagliaferro, EPA
Rose Howell, EPA
Tim Conway, EPA
Holly Inglis, EPA
K.C. Mitkevicius, USACE
Linda Palmieri, Weston Solutions
Thomas Angus, MDEP
Sue Steenstrup, MDEP
Anna Symington, MDEP
Jane Rothchild, MDEP
Mayor James Ruberto, City of Pittsfield
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Tom Hickey, PEDA
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