



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

April 15, 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: EPA Conditional Approval of General Electric's March 2008 *Groundwater Management Area 2 Long-Term Monitoring Program Monitoring Event Evaluation Report for Fall 2007*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's March 2008 *Groundwater Management Area 2 Long-Term Monitoring Program Monitoring Event Evaluation Report for Fall 2007* (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 (MDEP), approves the Report based on the following conditions.

1. In accordance with EPA's conditional approval letter dated October 9, 2007, GE shall submit an addendum to the Report including 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. GE shall update and include this assessment with each Long-Term Monitoring Event Evaluation report.
2. In Subsection 1.2.2, GE indicates that fill materials have been noted to depths of 7 ft bgs. However, the Pre-Design Investigation Report for the Former Oxbow Areas J & K Removal Action indicates that fill materials were noted to a depth of 9.5 ft bgs in soil boring RAA15-J2, and refusal on concrete was noted in soil boring RAA15-C6 at 10 ft bgs. GE shall amend the Report to address this discrepancy.
3. In its next groundwater monitoring round submittal, GE shall evaluate the MDEP's revised MCP GW-2 and GW-3 standards which became effective on February 14, 2008, and shall

discuss what additional measures will be implemented to address and comply with the revised standards.

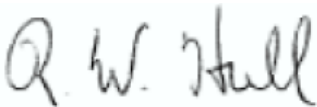
4. Subsection 4.4.1 indicates that the TCE concentration noted at well OJ-MW-2 was one-half of the MCP Method 1 GW-2 standard during the Fall 2007 monitoring round. The TCE concentrations reported for the Fall 2002 and Fall 2003 monitoring rounds, the two most recent fall monitoring rounds, were 0.012 ppm and 0.015 ppm, respectively. EPA concurs with GE's assessment to continue monitoring well OJ-MW-2 for VOCs as part of the long-term monitoring program.
5. EPA and MDEP do not agree with GE's derivation of GW-3 standards for cobalt and copper. All metals included in MDEP's Method 1 GW-3 standards use a groundwater dilution value ( $D_{GW}$ ) of 2.5 rather than the value of 25 used by GE. GE shall recalculate the Method 2 GW-3 values using a  $D_{GW}$  of 2.5, to be consistent with the MCP.

GE shall submit an addendum to the Report addressing the conditions in this letter within 30 days of the date of 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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