



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

July 30, 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 May 14, 2008, *Groundwater Management Area 2 Long-Term Monitoring Program Addendum to 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 May 14, 2008, *Groundwater Management Area 2 Long-Term Monitoring Program Addendum to Monitoring Event Evaluation Report for Fall 2007* (the "Addendum"). 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 Addendum based on the following conditions.

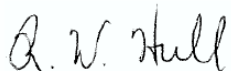
1. Regarding GE's derivation of alternate Method 2 GW-3 standards for copper and cobalt, EPA and the MDEP do not concur with some of GE's conclusions. When derived in the manner described in the Massachusetts Contingency Plan (MCP), the alternate standards are not "guidance values" but are considered to be the applicable Groundwater Standards. Furthermore, in its April 15, 2008, Conditional Approval Letter (CAL), EPA provided guidance so that a single Groundwater Standard value, rather than a range of values, would be derived for each of copper and cobalt, as anticipated in the MCP, CD and SOW. Based on the derivation provided by GE, EPA and the MDEP consider 0.23 mg/l and 0.075 mg/l, for copper and cobalt, respectively, to be the Method 2 GW-3 Groundwater Standards that should be applied at groundwater management area (GMA) 2 and the other GMAs at the GE site. EPA and the MDEP do concur with GE's conclusion that, based on current and historic monitoring results, additional monitoring for cobalt and copper is not warranted at GMA 2. Attached is a memorandum from the MDEP which provides further detail regarding the derivation of alternative groundwater standards.

2. In Section 3, Paragraph 3, of the Addendum, GE notes that acetone and chlorobenzene have not been detected in the upgradient GMA 2 wells adjacent to the western portion of GMA 4. However, acetone was detected in well GMA2-2 in April 2003 (0.018 parts per million (ppm)), and chlorobenzene was detected in well GMA2-6 (0.00057 ppm, estimated) in October 2003. Although these wells are not upgradient monitoring points, GE shall mention such results in any future groundwater assessments.
3. As an element of future groundwater monitoring events at GMA-2, GE shall collect additional groundwater elevation data to further document the possible groundwater divide east of GMA 2 and assess if it precludes groundwater flow from the southern portion of GMA 4 to the eastern end of GMA 2. Specifically, GE shall collect groundwater elevation data from well GMA 4-5 located at the Commercial Street Site in conjunction with the collection of data from the GMA 2 wells.
4. As an element of its future assessments of the extent and concentration of PCBs and VOCs detected in wells at GMA 2 relative to monitoring results from portions of GMA 1 and GMA 4, GE shall overlay an expanded water table contour map with data boxes depicting both mean and specific concentrations of individual constituents analyzed across the GMAs during the subject monitoring period. The data boxes shall list the concentrations of PCBs, total VOCs, and as applicable, commonly-detected VOCs, including tetrachloroethylene (PCE), trichloroethylene (TCE), toluene and vinyl chloride (VC).

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:

Dean Tagliaferro, EPA
Rose Howell, EPA
Tim Conway, EPA
Holly Inglis, EPA
K.C. Mitkevicius, USACE
Linda Palmieri, Weston Solutions
Michael Gorski, MDEP
Thomas Angus, MDEP

Tom Hickey, PEDA
Nancy E. Harper, MA AG
Dale Young, MA EOE
Jeffrey Bernstein, BCK Law
Theresa Bowers, Gradient
Mike Carroll, GE
Rod McLaren, GE
Andrew Silber, GE

Sue Steenstrup, MDEP
Anna Symington, MDEP
Jane Rothchild, MDEP
Mayor James Ruberto, City of Pittsfield
Pittsfield Commissioner of Public Health
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Chris Ferry, ASCR
James Nuss, ARCADIS
James Bieke, Goodwin Procter
John Ciampa, SPECTRA