



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ONE CONGRESS STREET, SUITE 1100
BOSTON, MA 02114-2023**

November 16, 2006

Mr. Andrew T. Silber
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 July 28 submittal titled *Groundwater Quality Interim Monitoring Report for Spring 2006, Groundwater Management Area 2, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.*

Dear Mr. Silber:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of General Electric's July 2006 *Groundwater Management Area 2 Groundwater Quality Interim Monitoring Report for Spring 2006* (Report) submitted on July 28, 2006. 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 (MDEP), approves the Report subject to the conditions presented below.

1. As mentioned in Section 2.2 of the Report, groundwater elevations taken from the 12 GMA-2 monitoring wells and one staff gauge were measured between April 13, 2006 and April 19, 2006. EPA's position is that measurement of groundwater elevations over a number of days is inconsistent with the accurate representation of groundwater elevations for this and other Groundwater Management Areas (GMAs). In future monitoring events, GE shall ensure that groundwater elevations are measured in a single day, as stated in Section 5.2 of the Report.
2. In Section 5.1.2 of the Report, GE proposes to respond to exceedances of MCP GW-3 concentrations for GMA2-1 (in former Oxbow Area J) with supplemental groundwater monitoring in Fall 2006. Due to the seasonal nature of variability of dissolved PCB concentrations, GE shall, in addition to the Fall 2006 sample, collect groundwater samples for dissolved PCB analysis from GMA2-1 in early March 2007. Further, GE shall evaluate trends in water quality (including seasonal effects and sampling variability) in this well and potential sources of PCBs. This evaluation shall be presented in the Baseline Assessment

Final Report and Long-Term Monitoring Program Proposal for GMA 2 (see comment 3).

3. Groundwater Management Area 2 (GMA-2) falls entirely within the boundary of the Former Oxbows J&K Removal Action Area (RAA). Given that the soil related Removal Actions at this RAA were completed during Summer 2006, GE, in accordance with the Consent Decree, including but not limited to Technical Attachment H of Appendix E, shall submit the Baseline Assessment Final Report and Long-Term Monitoring Program Proposal 75 days after the baseline field investigation program is completed (i.e., within 75 days of GE's receipt of the laboratory results of the final round of sampling at well GMA-2-1 currently scheduled for March 2007).

EPA reserves its right to perform additional sampling in the areas subject to the interim monitoring program and/or require additional sampling or response actions, if necessary, to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (617) 918-1240.

Sincerely,



Dean Tagliaferro

cc: Dick Gates, GE
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Affected Property Owners