



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

March 8, 2006

Mr. Andrew T. Silfer  
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 *Groundwater Management Area 3 Baseline Groundwater Quality and NAPL Monitoring Interim Report for Spring 2005*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of General Electric's *Groundwater Management Area 3 Baseline Groundwater Quality and NAPL Monitoring Interim Report for Spring 2005* (Report) submitted on August 30, 2005. 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. EPA disagrees with GE's proposal to reduce the frequency of LNAPL collection from monitoring well GMA3-13 from weekly to monthly as described in Section 5.4 of the Report. Instead, GE shall continue to monitor well GMA3-13 on a weekly basis and remove LNAPL if observed at thicknesses greater than the standard 0.25 feet criteria for LNAPL removal.
2. EPA disagrees with GE's proposal to use groundwater data and desktop modeling to assess whether LNAPL constituents beneath Building 51 are volatilizing and migrating to the indoor air of the building. The presence of LNAPL beneath Building 51 raises questions of uncertainty regarding the appropriateness of using a desktop model for an assessment of whether constituents in LNAPL pose an unacceptable risk to the occupants of Building 51. EPA understands that the proposal described in Section 5.4 of the Report has not yet been performed, but is restated in the *Groundwater Management Area 3 Baseline Groundwater Quality and NAPL Monitoring Interim Report for Fall 2005* which was submitted on February 27, 2006. In light of EPA's disagreement with GE's proposal regarding the assessment of whether LNAPL constituents beneath Building 51

are volatilizing and migrating to the indoor air of the building, EPA, in its response to the February 27, 2006 Report, will provide GE with further direction on this issue.

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,



William P. Lovely Jr.  
Remedial Project Manager  
GE/Housatonic River Project

cc:    John Novotny, GE  
      Michael Carroll, GE  
      Rod McLaren, GE  
      Mark Harkness, GE  
      Susan Steenstrup, MDEP  
      Anna Symington, MDEP  
      Robert Bell, MDEP  
      Thomas Angus, MDEP  
      Dean Tagliaferro, EPA  
      Holly Inglis, EPA  
      Rose Howell, EPA  
      Tim Conway, EPA  
      John Kilborn, EPA  
      K.C. Mitkevicius, ACOE

      James Nuss, BB&L  
      John Ciampa, SPECTRA  
      James Bieke, Goodwin Procter  
      Andrew Hogeland, GE Advanced Materials  
      Steven Deloye, GE Advanced Materials  
      Jeff Gardner, Berkshire Community College  
      Mayor James Ruberto, City of Pittsfield  
      Kevin Boland, CSX Transportation  
      Cheryl Grosso, United States Navy  
      Pittsfield Commissioner of Public Health  
      Nancy E. Harper, MA AG  
      Dale Young, MA EOE  
      Linda Palmieri, Weston Solutions  
      Public Information Repositories