



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

May 2, 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 Groundwater Quality and NAPL Monitoring Interim Report for Fall 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 Groundwater Quality and NAPL Monitoring Interim Report for Fall 2005* (Report) submitted on February 27, 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.

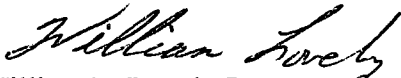
1. EPA disagrees with GE's proposal to use groundwater data to assess whether LNAPL constituents beneath Building 51 are volatilizing and migrating to the indoor air of the building. GE shall submit a revised proposal to EPA that includes an alternative to the proposed evaluation described in 5.2.4 of the Report. EPA suggests that GE's proposal be based on the collection of soil gas samples from beneath or adjacent to Building 51 as this approach is consistent with Technical Attachment H of the SOW and CD, and the EPA guidance document cited above.
2. EPA disagrees with GE's proposal to add monitoring wells 115A and 115B to the natural attenuation sampling as stated in Section 5.3.2 of the Report. Based on existing groundwater data, EPA's position is that it is premature to conclude that monitoring wells 115A and 115B are downgradient monitoring wells 114A and 114B-R. EPA suggests that GE consider measuring groundwater elevations from monitoring wells 115A and 115B during the Spring 2006 sampling event and present those results with a revised proposal in the Spring 2006 Groundwater Quality and NAPL Monitoring Interim Report for GMA-3, which is due on August 31, 2006.

GE shall provide the revised proposal described in condition 1 within 30 days from the date of this letter.

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  
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