



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

February 15, 2007

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: Conditional Approval of General Electric's September 15, 2006 submittal titled *Soil Gas Investigation Summary Report for GMA 3* (GECD330), and General Electric's October 20, 2006 *Soil Gas Migration Assessment Report for Groundwater Management Area 3* (GECD330), GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's September 15, 2006 *Soil Gas Investigation Summary Report for GMA 3* (GECD330), and GE's October 20, 2006 *Soil Gas Migration Assessment Report for Groundwater Management Area 3* (GECD330) (the Reports). 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, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the September 15, 2006 and October 20, 2006 Reports, subject to the following conditions:

1. EPA concurs with GE's conclusion that the constituents detected in the indoor air in buildings 51 and 59 were all found at concentrations below the limits for workplace exposure. EPA does not concur with GE's conclusion that there is no clear link between soil gas, groundwater and NAPL plumes below the building slabs and indoor air contamination.
2. GE shall conduct an inspection of buildings 51 and 59 to identify potential pathways for soil gas migration into buildings 51 and 59 through the building slabs or sidewalls. The inspection shall be conducted to specifically identify and document the following: a) large cracks in areas of unfinished concrete slab that appear to carry-through the entire thickness of the slab, 2) conduits that penetrate the slab and are not well sealed between the conduit and the concrete, 3) conduits penetrating any below-ground foundation walls, and 4) floor drains.

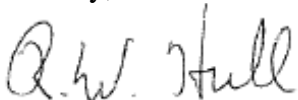
3. GE shall develop and propose a plan for EPA approval for conducting periodic subsurface soil gas and indoor air monitoring, below and within buildings 51 and 59. The proposal shall include the specific analytes to be monitored and the monitoring and analysis methods to be used. The proposal shall also include a provision for conducting a hazardous materials inventory assessment, concurrent with the monitoring event, to determine if products used or stored inside the building contain chemicals that are common to the target contaminants identified in the soils and groundwater. The proposal shall include a schedule for the concurrent monitoring of subsurface soil gas and indoor air that coincides with periodic groundwater and NAPL monitoring at GMA 3, but shall be no less frequent than once per year. The results of the periodic monitoring shall be included in GE's periodic groundwater quality and NAPL monitoring reports.

GE shall submit the results of the inspection conducted in accordance with condition 2, and the periodic subsurface soil gas and indoor monitoring plan required by condition 3, within 30 days of receipt of this letter. GE shall conduct the next periodic subsurface soil gas and indoor air monitoring in accordance with the EPA-approved plan, and include the results with the periodic groundwater monitoring report for GMA 3 due in the fall of 2007. Subsequent annual monitoring results shall be submitted annually along with the GMA 3 monitoring reports.

EPA reserves its 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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