



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

April 19, 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: EPA Conditional Approval of General Electric's February 27, 2007, submittal titled *Groundwater Management Area 3 (GECD330) NAPL Monitoring Report for Fall 2006*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's February 27, 2007, submittal titled *Groundwater Management Area 3 (GECD330) NAPL Monitoring Report for Fall 2006* (the "Report"). 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 February 27, 2007, Report, subject to the following conditions:

1. Figures 6 and 7 of the Report fail to identify well GMA4-3, which was monitored and considered as part of the GMA 3 assessment. In all future monitoring and assessment reports, GE shall describe and identify all monitoring wells utilized and considered as part of any GMA 3 groundwater and NAPL monitoring assessment on all relevant tables and figures, including well GMA4-3.
2. Section 3.4 of the Report indicates that 1,190 gallons of LNAPL have been removed from GMA 3 since 1997 as part of GE's NAPL monitoring and recovery program. Section 2.3 of the Report indicates that 1,232 gallons of LNAPL have been removed since 1997. Subsequent monitoring reports for GMA 3 shall be revised to provide a consistent and accurate accounting of the amount of LNAPL removed from GMA 3 since 1997 and more clearly identify and account for any discrepancies provided in earlier groundwater monitoring reports for GMA 3.
3. GE shall perform the LNAPL recovery rate testing of wells 51-8, 59-3R, GMA3-10, and GMA3-12, along with an assessment of the feasibility of installing an automated LNAPL

recovery system in the vicinity of those wells, as proposed in the Report.

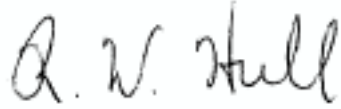
GE shall submit the results of the LNAPL recovery rate testing and provide a report on the feasibility of installing additional LNAPL recovery systems at GMA 3, as proposed in the Report and conditioned in 3 above, within 90 days of the date of this letter.

GE shall make every effort in the future to inspect wells and implement corrective measures as soon as anomalous data results are discovered in order to minimize any adverse impact to subsequent monitoring events.

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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