



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted via Overnight Courier*

November 12, 2007

Mr. Dean Tagliaferro  
EPA Project Coordinator  
U.S. Environmental Protection Agency  
c/o Weston Solutions, Inc.  
10 Lyman Street  
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site  
Groundwater Management Area 3 (GECD330)  
Second Addendum to Supplemental Soil Gas Migration Assessment Report and Sampling Plan**

Dear Mr. Tagliaferro:

On July 24, 2007, the General Electric Company (GE) submitted to the United States Environmental Protection Agency (EPA) a document titled *Addendum to Supplemental Soil Gas Migration Assessment Report and Sampling Plan* (Addendum to Supplemental Assessment Report) for Groundwater Management Area 3. That document was submitted in response to a conditional approval letter issued by EPA on June 25, 2007, for the *Supplemental Soil Gas Migration Assessment Report and Sampling Plan* (Supplemental Assessment Report), which had identified a number of potential migration pathways by which soil gas beneath Buildings 51 and 59 at the GE Pittsfield facility might enter the buildings through the slabs or sidewalls. In the Addendum to Supplemental Assessment Report, GE summarized the results of its assessment of those potential pathways in terms of whether the potential pathways/penetrations identified extend to the underlying soil, and it summarized the actions that had been taken to seal pathways/penetrations that may have extended to the underlying soil. The Addendum indicated the only such pathways/penetrations that may extend to the underlying soil and that could not be sealed during the available timeframe were five such potential pathways/penetrations in Building 51. The Addendum provided a proposal for addressing those five potential pathways/penetrations.

EPA provided conditional approval of the Addendum to Supplemental Assessment Report on October 1, 2007. Condition No. 1 of that letter directed GE to either seal the five penetrations within Building 51 that were unable to be sealed earlier or collect soil gas samples from those potential pathways for analysis of volatile organic compounds. EPA further directed GE to submit a report detailing the actions taken to seal those penetrations or providing the results of any soil gas samples collected from them within 45 days of its letter. This *Second Addendum to Supplemental Soil Gas Migration Assessment Report and Sampling Plan* (Second Addendum to Supplemental Assessment Report) has been prepared to address EPA's directives in that letter.

In accordance with EPA's conditional approval letter, GE revisited each of the five remaining potential pathways/penetrations identified in the Addendum to Supplemental Assessment Report that had not previously been addressed. Similar to the initial investigation summarized in the Addendum, GE determined during this follow-up assessment that the five remaining potential pathways/penetrations in Building 51 can be classified into one of two categories: (1) penetrations that do not extend to the underlying soil; and (2) penetrations that extended to the underlying soil and were sealed. The results of this assessment are described below, using the same numbering system for these potential pathways/penetrations that were used in the Supplemental Assessment Report and the July 24, 2007 Addendum. Photographs of these items were provided in Attachment A-2 of the Addendum to Supplemental Assessment Report.

*Penetrations That Do Not Extend to the Underlying Soil*

For Item (20), further investigation of this pump pit located beneath a steel grate in the former boiler room at the northeast end of Building 51 indicated that the entire area below the grate was enclosed in concrete. Therefore, this item is not a penetration to the underlying soil, and no further activities were performed.

For Item (25), further investigation of this fire line drain located in the fire pump room adjacent to the compressor room at the northeast end of Building 51 indicated that this item drains into a storm drain. This fire line drain is connected to the City of Pittsfield sewer system, and is not an unsealed penetration to the underlying soil. Therefore, no further activities were performed.

*Penetrations to the Underlying Soil That Were Sealed During Recent Assessment*

For Item (19), the open gravel floor areas in the former boiler room at the northeast end of Building 51 were sealed with concrete on October 1, 2007. There are no longer any open gravel areas in this room.

For Item (21), the open pipe chase in the former boiler room at the northeast end of Building 51 was filled in with flowable fill and capped with concrete on October 1, 2007.

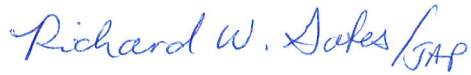
For Item (24), this fire pump pit is located adjacent to the compressor room at the northeast corner of Building 51. Penetrations to the underlying soil were present at two areas. Each area was addressed with flowable fill and then capped with concrete on October 1, 2007.

Attachment A provides photographic documentation showing that Items 19, 21, and 24 have been sealed and thus no longer constitute unsealed penetrations to the underlying soil.

Based on the findings and activities described above, no additional sampling (beyond that previously proposed in the Supplemental Assessment Report) was required. A summary of the soil gas/indoor air sampling and the material/product inventory for Buildings 51 and 59 (both of which were conducted on October 10-11, 2007, in accordance with the Supplemental Assessment Report) will be included in GE's GMA 3 Groundwater Quality and NAPL Monitoring Report for Fall 2007, due to EPA by February 28, 2008.

Please contact me if you have any questions or comments.

Sincerely,



Richard W. Gates  
Remediation Project Manager

Attachments

cc: Tim Conway, EPA  
Holly Inglis, EPA  
Rose Howell, EPA\*  
K.C. Mitkevicius, USACE  
Linda Palmieri, Weston (2 copies)  
Anna Symington, MDEP\*  
Jane Rothchild, MDEP\*  
Susan Steenstrup, MDEP (2 copies)  
Mayor James Ruberto, City of Pittsfield  
Pittsfield Commissioner of Public Health  
Nancy E. Harper, MA AG\*

Dale Young, MA EOE\*  
Michael Carroll, GE  
Andrew Silber, GE  
Rod McLaren, GE  
Dennis Arseneau, GE Corporate Properties  
Andrew Hogeland, SABIC  
John Wood, SABIC  
James Nuss, ARCADIS BBL  
James Bieke, Goodwin Procter  
Public Information Repositories  
GE Internal Repositories

(\* without attachments)

**Attachment A**

Building 51 Photos



(19) Open gravel floor areas in former boiler room at northeast end of Building 51 have been sealed with concrete.



(21) Open pipe chase in former boiler room at northeast end of Building 51 was filled in with flowable fill and capped with concrete.



(24-1) Fire pump pit (location 1) located adjacent to compressor room at northeast end of Building 51 filled in with flowable fill and capped with concrete.



(24-2) Fire pump pit (location 2) located adjacent to compressor room at northeast end of Building 51 filled in with flowable fill and capped with concrete.

GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
 SECOND ADDENDUM TO SUPPLEMENTAL SOIL GAS  
 MIGRATION ASSESSMENT REPORT AND SAMPLING PLAN

## BUILDING 51 PHOTOS