



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

April 23, 2008

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, 2008, submittal titled *Groundwater Management Area 3 (GECD330) Groundwater Quality and NAPL Monitoring Interim Report for Fall 2007*, 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, 2008, submittal titled *Groundwater Management Area 3 (GECD330) Groundwater Quality and NAPL Monitoring Interim Report for Fall 2007* (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, 2008, Report, subject to the following conditions:

1. In its next groundwater monitoring round submittal, GE shall evaluate the MDEP's revised MCP GW-2 and GW-3 standards which became effective on February 14, 2008, and shall discuss what additional measures will be implemented to address and comply with the revised standards.
2. EPA does not concur with GE's conclusion presented in Section 4.1 that ongoing NAPL recovery operations at GMA 3 have proven effective in preventing LNAPL migration. GE's historic NAPL monitoring and recovery operations have demonstrated an intermittent presence of LNAPL at numerous wells along the edges of the bounds of LNAPL that has been consistently detected during various monitoring events indicating periods of migration as well as periods of retreat, so that no definitive conclusion should be drawn at this time.
3. GE shall investigate the condition of the wells that were monitored as dry during the Fall 2007 monitoring event (51-7, 51-9, 51-13 and 59-1), provide an explanation of the

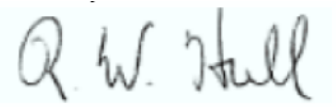
condition and propose measures to be implemented to correct any deficiencies that may have caused the dry wells. GE shall determine if the wells that were monitored as dry are fouled and propose measures to repair any wells that are determined to be fouled.

4. GE shall evaluate if a connection exists between groundwater elevations and LNAPL recovery volumes at GMA 3. In its report for the Spring 2008 monitoring period, GE shall provide the results of the evaluation, along with an assessment of any additional measures that may be implemented to enhance and increase LNAPL recovery operations at GMA 3.

EPA reserves all of its rights under the CD, including but not limited to, the 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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