



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

October 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 August 29, 2008, submittal titled *Groundwater Management Area 3 (GECD330) Groundwater Quality and NAPL Monitoring Interim Report for Spring 2008*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's August 29, 2008, submittal titled *Groundwater Management Area 3 (GECD330) Groundwater Quality and NAPL Monitoring Interim Report for Spring 2008* (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 Report, subject to the following conditions:

1. EPA does not concur with GE's conclusions presented in Section 4.6. Drawing definitive conclusions with regard to the effectiveness of NAPL recovery operations at GMA 3 preventing LNAPL migration is premature. 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.
2. GE shall investigate the condition of all of the wells in GMA 3 that are currently gauged or monitored as part of the interim monitoring program, to determine if sediment buildup conditions have occurred similar to that discovered at wells 51-7, 51-9, 51-13 and 59-1 and determine if any wells need to be re-developed. The investigation of each well shall be conducted at the time the well is next gauged or monitored and shall include an assessment of the extent of sediment buildup relative to constructed screen depths. The results of the investigations and any proposed mitigation measures shall be presented in the next semiannual groundwater report following the investigations. GE shall continue

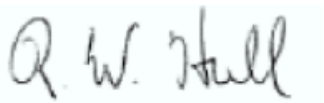
to assess the extent of sediment buildup conditions in all GMA 3 wells as a routine element of well gauging, monitoring and maintenance.

3. GE shall continue to evaluate and graph the relationship between groundwater elevations and LNAPL recovery volumes at GMA 3 and present the results of the evaluations and the graphs, along with an assessment of any additional measures that may be implemented to enhance and increase LNAPL recovery operations at GMA 3, in all future groundwater and NAPL monitoring reports.
4. The first paragraph of Section 4.1 cites Table F-1 of Appendix F as providing a summary of all available historical natural attenuation analytical data for the wells that were analyzed for these parameters in spring 2008. However, no such table was included in Appendix F. GE shall provide a table containing that data in the next groundwater quality and NAPL monitoring interim report.
5. EPA does not concur with GE's conclusions presented in Sections 4.4 and 4.5 regarding the trend of groundwater VOC and natural attenuation monitoring results. Specifically, there is insufficient data to conclude that natural degradation of chlorobenzene is occurring. In the monitoring report submitted after the next natural attenuation sampling event, GE shall further discuss the proportions of chlorobenzene and its breakdown products in groundwater at the downgradient sampling locations.
6. During all future monitoring events, GE shall use best efforts to measure groundwater elevations within a two-day period. Also, at the time of the collection of groundwater samples, GE shall note the groundwater elevation for each well and the flow in the Housatonic River as measured at Coltsville, and include this information in the groundwater reports.

EPA reserves all of its rights under the Decree, including but not limited to, the right to perform and/or require additional sampling or response actions, if necessary, to meet the requirements of the Consent Decree. If there is any conflict between the Performance Standards as stated in the Report and the Performance Standards as stated in the Consent Decree and SOW, the Consent Decree and SOW shall control.

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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