



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

December 7, 2006

Mr. Andrew T. Silfer
Corporate Environmental Programs
General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Approval of General Electric's *August 30, 2006 submittal titled Groundwater Management Area 3 Groundwater Quality and NAPL Monitoring Interim Report for Spring 2006*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of General Electric's *Groundwater Management Area 3 Groundwater Quality and NAPL Monitoring Report for Spring 2006* ("Report") submitted on August 30, 2006. The Report 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), conditionally approves the Report subject to the following conditions.

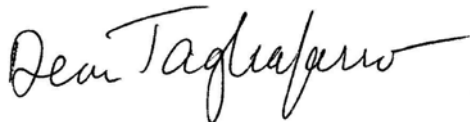
1. GE shall analyze filtered groundwater samples collected from Well 114A for PCBs whenever GE collects and analyzes samples from well 114B-R for PCBs. This is necessary to assess the vertical migration of PCBs in the water column.
2. GE shall increase the gauging of well 78B-R to monthly as proposed in the September 2005 Pre-Design Investigation Report for Unkamet Brook.
3. GE shall install a monitoring well at location RAA10-N-Y-18 to look for the presence of NAPL. The well shall be screened from 1.0 to 11.0 feet below ground surface (in order to provide a minimal surface seal), and constructed with a 2-inch diameter, 20-slot (0.02-inch) screen and #2 sand, to maximize the capacity for intrusion of NAPL. GE shall construct the well with a 1-ft DNAPL sump from 11.0 to 12.0 ft. GE shall gauge and monitor the well on a monthly basis. Since this well will have a minimal surface seal, it will be used for NAPL monitoring and not groundwater quality monitoring.

4. In future submittals, GE shall post and incorporate groundwater elevations from GMA 4 wells 60B and RF-14 into the groundwater elevation tables and groundwater elevation contour map.
5. In the next submittal, GE shall include the references for their statement that chlorobenzene breakdown products include 2- and 4-chlorophenol, as well as any references that support the “natural” breakdown of chlorobenzene in the environment.
6. In the next submittal, GE shall clarify the quantity of LNAPL recovered in the Spring of 2005. This report indicates that 165 gallons of LNAPL were recovered in the Spring of 2005. However, GE’s Spring 2005 report indicated that approximately 77 gallons of LNAPL were recovered. Also, if significant decreases in LNAPL recovery are identified, GE shall provide an explanation for the decreased recovery, and, if appropriate, propose enhancements to the LNAPL recovery system. GE shall ensure that the total quantity of LNAPL removed since 1997 is adjusted accordingly.
7. Note that EPA does not agree with GE’s interpretation that well cluster 115 is a downgradient location with respect to the dissolved VOC plume. The well cluster may be cross-gradient to the point along Unkamet Brook where groundwater from the dissolved VOC plume is likely to discharge to surface water.

EPA reserves its right to perform additional sampling in the areas subject to the interim monitoring program and/or require additional sampling or response actions, if necessary, to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (413) 236-0969.

Sincerely,



Dean Tagliaferro

cc: Skip Hull, EPA
Holly Inglis, EPA
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