



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

June 5, 2006

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

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's August 30, 2005 *GMA 4 Groundwater Quality Monitoring Interim Report for Spring 2005* and February 27, 2006 *GMA 4 Groundwater Quality Monitoring Interim Report for Fall 2005*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's August 30, 2005 *GMA 4 Groundwater Quality Monitoring Interim Report for Spring 2005* and February 27, 2006 *GMA 4 Groundwater Quality Monitoring Interim Report for Fall 2005*. This letter is subject to the terms and conditions specified in the Consent Decree that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the Consent Decree, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the August 30, 2005 and February 27, 2006 reports, subject to the following conditions:

1. GE shall discuss how differences in well screen depth, seasonal variations, or other factors may affect the observation of vinyl chloride in future GMA 4 submittals. For example, in Section 4.3.1 of the February 27, 2006 report, vinyl chloride was detected in H78B-16 above the MCP GW-2 standard but was not detected above the standard in downgradient well H78B-17R.
2. GE shall incorporate a discussion of groundwater elevation, flow direction, contaminant migration, and seasonal trends into future GMA 4 submittals. For example, in Section 4.3.2 of the February 27, 2006 report, OPCA-MW-1 and OPCA-MW-7 (which both contained PCBs above the MCP GW-3 standard) may be down gradient or side

gradient OPCA monitoring points. In addition, following GE's performance of the enhanced groundwater elevation monitoring program proposed in the February 27, 2006 report as supplemented by EPA's collection of other groundwater elevation and/or chemical data (see condition 7), GE shall evaluate the potential that additional monitoring wells (e.g., 78-6 and GMA4-6) or piezometers may also be considered as down gradient monitoring points relative to the Hill 78 OPCA.

3. In the February 27, 2006 report, Section 4.3.4 indicates that PCB data from wells OPCA-MW-3 and OPCA-MW-8 were rejected, but Section 3.2.3 states that only a portion of the PCB data from OPCA-MW-3 and all PCB data from OPCA-MW-8 was rejected. It is EPA's understanding that the narrative in Section 3.2.3 provides the correct interpretation of the PCB data from these locations following data validation.

4. EPA does not necessarily agree with GE's statement in Section 4.4 of the February 27, 2006 report, that recent "activities performed at GMA 4 indicate no significant impacts on groundwater," since certain contaminants were detected above their respective MCP standards in possible down gradient or side gradient wells (namely PCBs in OPCA-MW-1 and OPCA-MW-7, and cyanide in 78-6). EPA will continue to note such exceedences and will consider such information in our review of the final Baseline Assessment Report where GE will present its final groundwater evaluation and proposed long-term groundwater monitoring program.

5. If consolidated wastes will be placed over OPCA-MW-1 as a result of the proposed shift of the Hill 78 OPCA footprint, GE shall decommission OPCA-MW-1 and replace it with OPCA-MW-1R which shall be located on the same side of the groundwater divide as the Hill 78 OPCA (see attached figure for approximate location). GE's proposal in Section 5.3.2 of their February 27, 2006 report, which is to use GMA4-4 as a replacement for OPCA-MW-1, is unacceptable because GMA4-4 is on the other side of the groundwater divide.

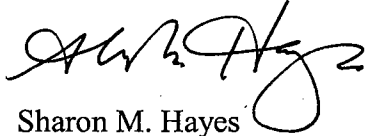
6. GE shall include the new well GMA4-6 in the ongoing OPCA Groundwater Quality Monitoring Program.

7. Pursuant to Paragraph 97 of the Consent Decree, EPA may install additional monitoring wells or piezometers on or adjacent to the Allendale School property. GE shall include EPA-generated groundwater elevation and/or chemical data from these monitoring wells or piezometers in developing water table contour and contaminant migration maps for future GMA 4 submittals.

EPA's approval with conditions of the subject deliverables should not be interpreted as an endorsement of certain of GE's characterizations of data therein, as discussed above. EPA reserves its right to perform additional sampling 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 (617) 918-1328.

Sincerely,



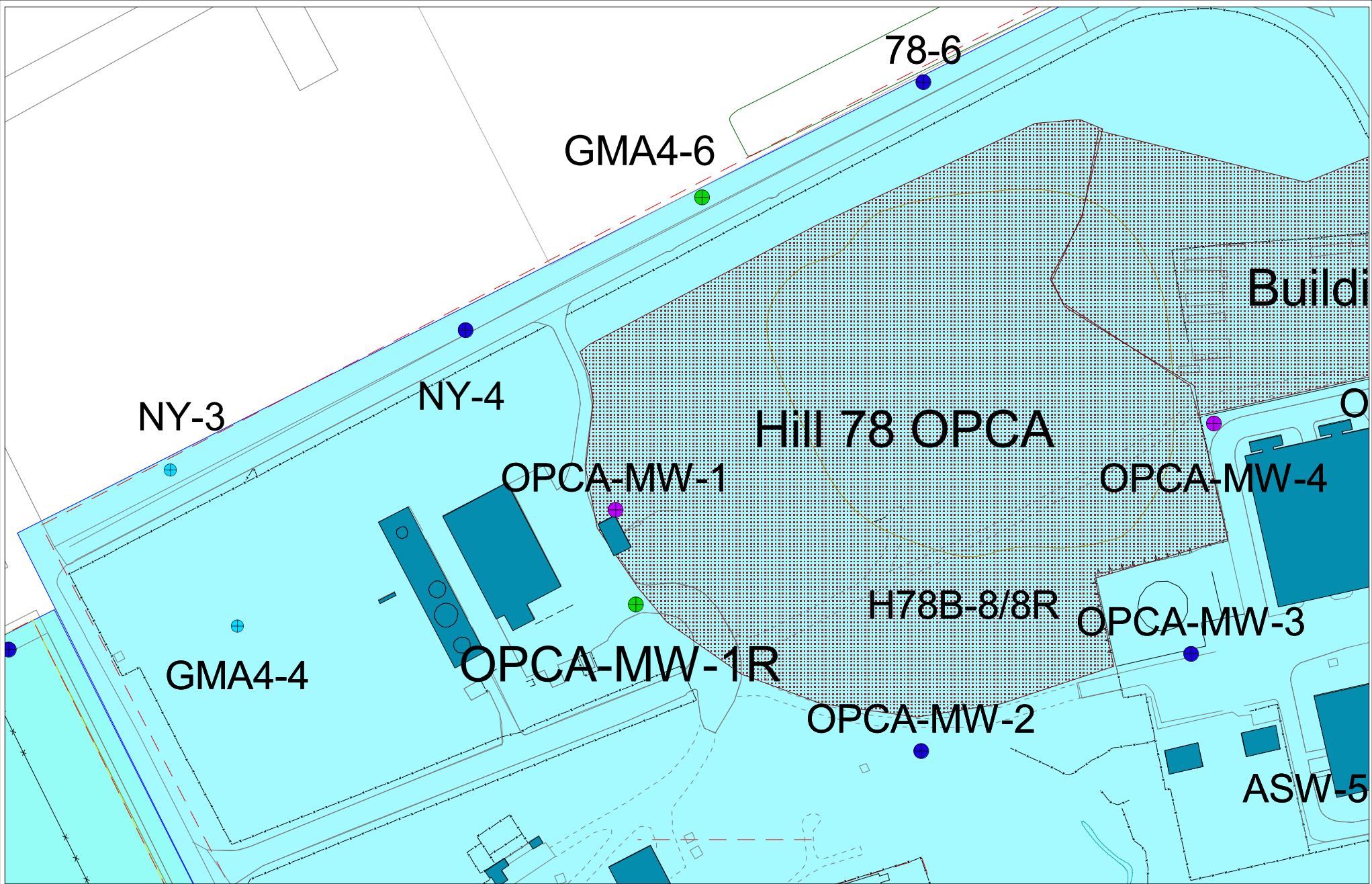
Sharon M. Hayes
GE Facility Project Manager

Attachment

cc:

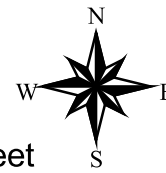
Dean Tagliaferro, EPA
Tim Conway, EPA
Rose Howell, EPA
Holly Inglis, EPA
Sue Steenstrup, MDEP
Anna Symington, MDEP
Jane Rothchild, MDEP
Thomas Angus, MDEP
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Richard Gates, GE
James Nuss, BBL
James Bieke, Goodwin Procter LLP
Linda Palmieri, Weston Solutions
Dale Young, MA EOE
Teresa Bowers, Gradient
Jeffrey Bernstein, Bernstein, Cushner & Kimmell
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GMA Monitoring Points

- GW-2/3 compliance well
- GW-3 compliance well
- Groundwater Elevation well
- Proposed well



GE/Housatonic River Project
Draft-Confidential

Figure 1
GMA 4 Groundwater
Monitoring Network