

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

December 23, 2002

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

Via Electronic and U.S. Mail

Re: **Comments on GE's July 2002 *Groundwater Management Area 5 Baseline Groundwater Quality Interim Report for Spring 2002*, General Electric (GE) Housatonic River Project Site, Pittsfield, Massachusetts.**

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the pre-design investigation activities for the above-referenced *Groundwater Management Area 5 Baseline Groundwater Quality Interim Report for Spring 2002* (Report). 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) and discussions with General Electric (GE) personnel, approves the above-referenced submittal subject to the following conditions:

General Conditions

1. Since completion of the Spring 2002 sampling round, EPA has approved the use of peristaltic pumps for volatile organic compound (VOC) sample collection. Therefore, bailers will not be utilized for VOC sample collection in conjunction with the peristaltic pump sampling method used in the future. EPA recommends greater use of bladder pumps instead of peristaltic pumps during subsequent sampling rounds, particularly at wells that have shown relatively high turbidities when a peristaltic pump was previously used, and generally for collection of groundwater samples for VOC analysis.
2. In order to better define groundwater flow direction in the western portion of GMA 5 in future baseline monitoring interim reports, GE shall incorporate one or more of the existing groundwater monitoring wells located at the southwest corner of GMA 5 into the quarterly groundwater elevation rounds, in order to assess groundwater flow direction in this area. EPA suggests that groundwater elevations at existing monitoring wells GT-7 and GES-7, -8, and/or -9 be measured during the quarterly groundwater elevation rounds.
3. In Appendix A, EPA has the following comment regarding data included in Groundwater Sampling Field Logs. Field measurement of dissolved oxygen at well GMA5-1 was recorded as

0.0 mg/L throughout the low-flow sampling, due to an apparent instrument problem that was not corrected.

During future semi-annual groundwater sampling rounds, GE shall correct problems with field equipment when identified during sampling before proceeding with sampling, in order to ensure that field standard operating procedures (SOPs) are followed and data quality objectives are met. Deviations to either the FSP or Quality Assurance Project Plan shall be presented in the subsequent reports. Justification for the deviations shall also be provided and corrective measures should be proposed if necessary.

The above comments relating to the contents of the Spring 2002 report shall be addressed in future baseline groundwater quality interim reports for GMA 5, and comments related to the performance of sampling activities shall be implemented prior to the Winter 2003 quarterly groundwater elevation monitoring round. EPA reserves its right to perform additional sampling in the areas subject to the baseline 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 (617) 918-1268.

Sincerely,



Michael J. Nalipinski  
GE Facility Project Manager

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