



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 1  
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BOSTON, MASSACHUSETTS 02114-2023

01-0637

SDMS 49281

September 23, 2003

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 2003 *Groundwater Management Area 5 Baseline Groundwater Quality Interim Report for Spring 2003*, 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 2003* (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:

1. During the Spring 2003 groundwater sampling event, EPA and its contractors were conducting remediation of the Housatonic River in the area adjacent to the southwestern-most section of GMA5. River remediation involved the installation of sheetpiles to create cells and the dewatering of cells to an elevation of approximately 960 ft above mean sea level (amsl). This could have potentially affected groundwater elevations and hydrology. In the future, GE shall discuss the river remediation work in their reports. In particular, GE shall note whether remediation cell dewatering or surface water impoundment was being performed in the vicinity of monitoring wells measured for water level elevations at the time of their measurements.
2. In Subsection 3.3, GE should have noted that chlorinated solvents have been detected in groundwater samples collected in December 2002 from the following monitoring wells: GES-8, GES-9, GT-102, and RW-2. Combined with GE and EPA split groundwater sample results from well GMA5-3, which also indicate the presence of trace level chlorinated solvents, the data indicate a source of chlorinated solvent contamination at an undefined location near or upgradient of the former Elm Street Mobil Station. GE shall include such details in future submissions.
3. GE's water table elevation map, Figure 4, incorporates elevations or data from the wells on the adjacent MCP site and this information is discussed in Section 3.3; however, GE includes an apparently anomalous water level for well GES-206. Unlike the other wells used to collect water level elevation data, well GES-206 is not a shallow water table well, but is screened across a partially-confined aquifer within the glacial till unit. Further well GES-206 had been subject to

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regular product recovery, resulting in water table depression evident in Figure 4. For these reasons, GE shall exclude future groundwater elevation measurements from the GES 206 well. Instead, GE shall include measurement data from a shallow water table well(s) in this area.

The above comments relating to the contents of the Spring 2003 report shall be addressed in future baseline groundwater quality interim reports for GMA 5. If there is any conflict between the Performance Standards as described in the Report and as set forth in the Consent Decree and/or Statement of Work for Removal Actions Outside the River (Appendix E to the Consent Decree), the Statement of Work shall control. 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

cc:	Dick Gates,	GE
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