



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

June 13, 2007

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

Via Electronic and U.S. Mail

Re: Approval of General Electric's March 2007, submittal titled *Field Sampling Plan/Quality Assurance Project Plan* and *Project Operations Plan*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter provides the Environmental Protection Agency's (EPA) approval of GE's March 2007, submittal titled *Field Sampling Plan/Quality Assurance Project Plan* and *Project Operations Plan* (the "FSP/QAPP and POP"). 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 March 2007, FSP/QAPP and POP, subject to the following condition:

1. In addition to the requirements of Section 3.3 of Attachment B to the POP, the use of any existing excavated site soils or crushed building demolition debris must comply with any effective Environmental Restriction and Easement imposed on the Removal Action Area that generates and/or receives any such material.

As previously indicated, EPA still recommends the use of an alternative dual column pair selection in order to satisfy the confirmation requirements of EPA Method 8082, rather than the column confirmation procedure currently used by NEA and described in its August 24, 2006, *Standard Operating Procedure for the Determination of PCB Aroclors by US-EPA SW-846 Method 8082*. The ZB-1/ZB-2 dual column pair selection does not provide enough dissimilarity as recommended by Method 8082 for measuring PCB Aroclors in air. But because the analysis and applicable SOP are being used for samples from a source known to contain specific Aroclors, Method 8082 suggests that a second column confirmation procedure may not be necessary as long as there is a clearly recognizable pattern. Accordingly, although EPA believes that the use of an alternate dual column procedure would be preferable, it will not require that

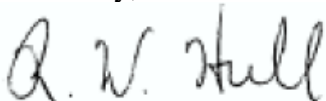
NEA modify SOP NEA 148 for the purpose of approving the revised FSP/QAPP.

EPA reserves its right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the CD. If there is any conflict between the Performance Standards as described in the above-referenced submittals, and as set forth in the Consent Decree and/or Statement of Work, the Consent Decree and Statement of Work shall control.

Attached with this letter is the FSP/QAPP title and approval sheet signed by EPA and the MDEP.

If you have any questions, please contact me at (617) 918-1882.

Sincerely,



Richard W. Hull
GE Facility Project Manager

cc:

Dean Tagliaferro, EPA
John Kilborn, EPA
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John Ciampa, Spectra

**Field Sampling Plan/
Quality Assurance Project Plan**
for
General Electric Company
Pittsfield, Massachusetts

APPROVALS:




Dean Tagliaferro/Project Coordinator (EPA)

6/14/07
Date



Susan Steenstrup/Project Coordinator (MDEP)

6/13/07
Date



Andrew T. Silfer/Project Coordinator (GE)

3/30/07
Date



James M. Nuss or
Stuart D. Messur/Supervising Contractor (ARCADIS BBL)

3/30/07
Date



Dennis K. Capria/Overall QA/QC Coordinator (ARCADIS BBL)

3/30/07
Date

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Note:

This title and approval sheet has been prepared in accordance with Section 3.2.1 of the document titled *EPA Requirements for Quality Assurance Project Plan*.