



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

April 6, 2005

Mr. Andrew T. Silber
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 *Conceptual Removal Design/ Removal Action Work Plan for Former Oxbows A & C*, General Electric/Housatonic River Project Site, Pittsfield, Massachusetts.

Dear Mr. Silber:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Conceptual Removal Design/ Removal Action Work Plan for Former Oxbows A & C* (Work Plan) dated January 2005. The Work Plan 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 Work Plan subject to the conditions which are presented below.

1. As shown on Figure 4-1, the drainage swale at the end of Day Street is in an area where PCBs will remain in the soil at a spatially weighted concentration of up to 10 ppm. GE shall present in the Final RD/RA Work Plan its plan to minimize the potential for material within the drainage swale to discharge to the river.
2. The Work Plan does not clearly state whether the planned 1 foot and 2 foot removals in the northeast corner of Parcel I8-23-6 will be based on the existing elevation prior to EPA constructing any access roads, support areas, and any restoration. All remediation needs to begin at the existing elevation prior to EPA constructing any access roads, support areas, and performing any restoration. GE shall ensure that the removals presented in the Final RD/RA Work Plan are based on the existing elevation prior to EPA's construction activities as stated above.
3. Several figures show areas where soil removals were performed prior to the collection of Pre-Design Investigation samples. However, the Work Plan does not state how these previous

soil removals were evaluated. GE shall clarify in the Final RD/RA Work Plan the role that previous removals played in the development of the removals presented in the Conceptual RD/RA Work Plan.

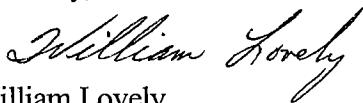
4. Footnotes #1 and #2 for Tables C-13 through C15 (which depict post-remediation conditions) are not accurate, since remediation will occur in polygons drawn around locations RAA11-C17 and RAA11-G15 and these locations will be replaced with clean backfill. Hence, references to collection dates are no longer accurate or relevant. In future submissions, GE shall change these and similar footnotes to correct errors such as those mentioned in this comment and clarify what is being represented in the tables.

GE shall submit the Final RD/RA Work Plan for Former Oxbows A&C within three months of the date of this letter.

If there is any conflict between the Performance Standards as described in the Work Plan 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 Consent Decree and Statement of Work shall control. 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) 918-1240.

Sincerely,



William Lovely
Remedial Project Manager
GE/Housatonic River Project

cc:

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