GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Electronic Mail/Overnight Delivery

May 22, 2007

Mr. Dean Tagliaferro
EPA Project Coordinator
U.S. Environmental Protection Agency
c/o Weston Solutions, Inc.
10 Lyman Street, Suite 2
Pittsfield, MA 01201

Re: GE-Pittsfield/Housatonic River Site
Lyman Street Area (GECD430) – Properties East of Lyman Street
EPA Requested Information and Analytical Data for Proposed Backfill Sources

Dear Mr. Tagliaferro:

This letter addresses recent comments provided by the U.S. Environmental Protection Agency (EPA) during an Apri l 30, 2007 site visit and subsequent meetings with General Electric Company (GE) regarding the Lyman Street Area - Properties East of Lyman Street. Additionally, this letter provides a summary of the laboratory analytical results for proposed backfill sources to be used during the response actions.

The attached Revised Engineered Barrier Final Grade Plan (Attachment 1) addresses the following construction activities:

- extending the engineered barrier to the existing pavement along Lyman Street;
- replacing the chainlink fence along Lyman Street within the engineered barrier;
- relocating trees along the riverbank that are removed as a result of the engineered barrier installation;
- removing brush and trees smaller that six inches in diameter in the area subject to Natural Resource Restoration/Enhancement;
- disposing of soil that is removed as part of grading activities in the area subject to Natural Resource Restoration/Enhancement as non-TSCA material at the Hill 78 On-Plant Consolidation Area (OPCA);
- placing three inches of topsoil over soil fill in the area subject to Natural Resource Restoration/Enhancement;
- relocating the above grade/below grade transition of the groundwater collection pipe outside of the engineered barrier; and
- relocating the fence along the northern limit of Parcel I9-8-1 to the property line.

As stated in the March 29, 2007 Supplemental Information Package (SIP), GE is providing analytical results (Attachment 2) associated with sampling of the proposed soil fill and gravel sources to be used by the on-site contractor. Specifically, as indicated in the attached tables, the soil fill sample was collected from a stockpile maintained by Pittsfield Sand & Gravel, located at Brown's Pit in Dalton, Massachusetts; the gravel was collected from a stockpile maintained by Pittsfield Sand & Gravel, located in Pittsfield, Massachusetts. Additionally, as stated in the SIP, GE will be using the on-site stockpiled soil generated during the removal of access roads within the 1½ Mile Floodplain Areas for fill beneath the geosynthetic components of the engineered barrier. The analytical results for the on-site stockpiled soils (as provided by EPA to GE via electronic mail on April 4, 2007) are included in Attachment 3. The analytical results for the proposed topsoil source will be submitted in a forthcoming letter.

If you have any further questions, please feel free to contact me.

Sincerely,

Richard W. Gates/CAA

Richard W. Gates
Remediation Project Manager

CAA/cmb
Attachments

cc: Rose Howell, EPA*
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Linda Palmieri, Weston (2 copies)
Bruce Collingwood, City of Pittsfield
Michael Carroll, GE*
Andrew Silfer, GE
Roderic McLaren, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter LLP
Public Information Repositories
GE Internal Repository
* *without attachments*

ARCADIS BBL

Attachment 1

LEGEND

- APPROXIMATE PROPERTY LINE LOCATION
- GRADE BREAK
- LIMITS OF GRADING
- 990 — PROPOSED CONTOUR (SEE NOTES 2 AND 4)
- 985.5 X — PROPOSED SPOT ELEVATION
- PROPOSED BARRIER COLLECTION PIPE (SEE NOTE 3)
- PIPE FLOW DIRECTION
- PERMANENT EROSION CONTROL MAT
- H.P. — HIGH POINT
- AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT (1/6) (SEE NOTES 9, 10 AND 11)
- AREA SUBJECT TO ENGINEERED BARRIER AND NATURAL RESOURCE RESTORATION
- ACCESS ROAD (8/6)
- AREA PREVIOUSLY ADDRESSED AS PART OF 1/2 MILE REACH REMOVAL ACTIVITIES (SEE NOTE 12)

NOTES:

1. REFER TO THE TECHNICAL DRAWINGS OF THE FINAL RD/RA WORKPLAN FOR ADDITIONAL BASEMAP INFORMATION, CONTRACTOR REQUIREMENTS AND DESIGN DETAILS.
2. PROPOSED AND EXISTING CONTOUR INTERVAL IS 1 FOOT.
3. ENGINEERED BARRIER COLLECTION PIPES SHALL HAVE A MINIMUM SLOPE OF 0.5%.
4. PROPOSED GRADES REPRESENT TOP OF ENGINEERED BARRIER (i.e., TOPSOIL).
5. REFER TO NOTE 6, DRAWING 2 FOR DESCRIPTION OF NAPL COLLECTION SYSTEM ACTIVITIES.
6. CHAIN LINK FENCE REMOVED AS PART OF THE SITE WORK ACTIVITIES SHALL BE REPLACED AROUND THE PERIMETER OF EACH PROPERTY AT THE PROPERTY LINE. WHEREVER POSSIBLE, PORTIONS OF THE CHAINLINK FENCE SHALL BE RELOCATED OUTSIDE THE LIMITS OF THE ENGINEERED BARRIER TO MINIMIZE LINER PENETRATIONS. PORTIONS OF THE CHAINLINK FENCE THAT MUST BE PLACED WITHIN THE LIMITS OF THE ENGINEERED BARRIER DUE TO THE PROPERTY LINE'S PROXIMITY TO LYMAN STREET, SHALL BE INSTALLED INSIDE OF THE ANCHOR TRENCH (AS SHOWN ON DETAIL 1 OF DRAWING 2 OF THESE TECHNICAL DRAWINGS).
7. THE BARRIER COLLECTION PIPE OUTLET SHALL EXTEND INTO THE EXISTING RIVER BANK RIPRAP.
8. THE CONTRACTOR SHALL VERIFY THE 12-INCH THICKNESS OF THE ENGINEERED BARRIER AND 18-INCH THICKNESS OF THE ACCESS ROAD IN ACCORDANCE WITH THE PROJECT'S REQUIREMENTS.
9. THE AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT SHALL BE GRADED AS SHOWN WITH 3 INCHES (MINIMUM) OF TOPSOIL PLACED ABOVE IMPORTED SOIL FILL OR 3 INCHES OF TOPSOIL PLACED ABOVE EXISTING/EXCAVATED SURFACE.
10. BRUSH AND OTHER GROUND VEGETATION WITHIN THE AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT SHALL BE REMOVED. ALL TREES LARGER THAN SIX INCHES IN DIAMETER WILL NOT BE REMOVED AND SHALL BE PROTECTED FROM DAMAGE AND DISTURBANCE. SOIL PLACED IN THE VICINITY OF THE TREES TO REMAIN SHALL BE FEATHERED SO THAT SOIL IS NOT PLACED DIRECTLY AROUND THE TRUNK OF THE TREE.
11. ALL SOIL REMOVED AS PART OF REGRADING ACTIVITIES IN THE AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT SHALL BE DISPOSED OF AS NON-TSCA SOIL AT THE HILL 78 OPCA.
12. TREES ALONG THE RIVERBANK WITHIN THE AREA PREVIOUSLY ADDRESSED AS PART OF 1/2 MILE REACH REMOVAL ACTIVITIES THAT ARE WITHIN THE ENGINEERED BARRIER LIMITS MUST BE RELOCATED ALONG THE RIVERBANK IN LOCATIONS DETERMINED BY GE. ALL SOIL REMOVED AS PART OF THE TREE RELOCATION ACTIVITIES SHALL BE DISPOSED OF AS TSCA SOIL AT AN OFFSITE DISPOSAL FACILITY.
13. ABOVE GRADE/BELOW GRADE TRANSITION OF THE GROUNDWATER COLLECTION PIPE SHALL BE RELOCATED TO PARCEL 19-8-2, JUST OUTSIDE OF THE ENGINEERED BARRIER, TO AVOID LINER PENETRATIONS.
14. WOOD STOCKADE FENCE THAT EXISTS 2 FEET SOUTH OF THE PROPERTY LINE SHALL BE RELOCATED 2 FEET NORTH TO THE PROPERTY LINE TO FACILITATE NATURAL RESOURCE RESTORATION/ENHANCEMENT ACTIVITIES.

ORIGINAL SCALE APPLIES TO 22"X34" DRAWING

30' 0 30' 60'

THIS DRAWING WAS PREPARED AT THE SCALE(S) INDICATED. INACCURACIES IN THE STATED SCALE(S) MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED. **USE THE GRAPHIC SCALE BAR(S) TO DETERMINE THE ACTUAL SCALE(S) OF THIS DRAWING.**

No.	Date	Revisions	Init

Professional Engineer's Name		
Professional Engineer's No.		
State: MASS	Date Signed	
Project Mgr.: CAA	Designed by: RWP	Drawn by: NES

ARCADIS BBL
Infrastructure, environment, facilities

GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
LYMAN STREET AREA REMEDIAL ACTION

REVISED ENGINEERED BARRIER FINAL GRADE PLAN

TECHNICAL DRAWINGS

ARCADIS Project No. 206.91

Date JANUARY 2007

ARCADIS U.S., INC.
6723 TOWPATH ROAD
SYR., N.Y. 13214-0066
315.446.9120

1

SYR-85-NES GMS LAF LAYER: ON=*; OFF=REF, 120691X0|BLDG-SH, |BNDS, |EO_PAVEMENT, |FL_CHAINLINK, |FL_CHAINLINK-REMOVED, |MISC_BOLLARDS, |REMOVALBDRY
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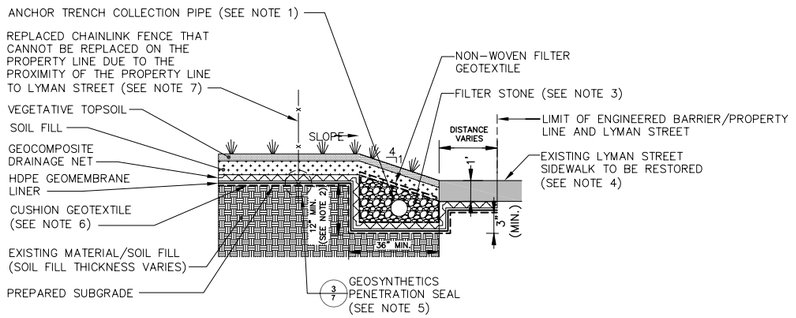
PROJECTNAME:-----
XREFS: 30916X01 30916X00
IMAGES:



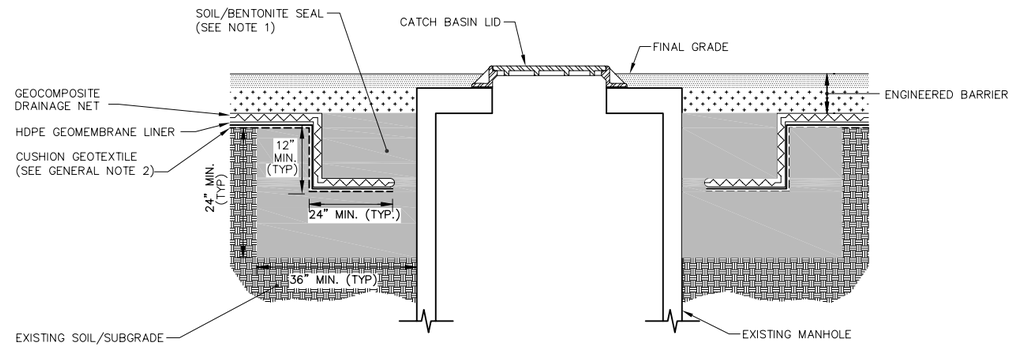
NOTES:

1. ANCHOR TRENCH COLLECTION PIPE SHALL BE 6"ø PERFORATED SMOOTH-BORE CORRUGATED HDPE.
2. ANCHOR TRENCH DEPTH MAY EXCEED 12-INCH AS NECESSARY TO ACHIEVE COLLECTION PIPE INVERTS SHOWN ON DRAWING 1.
3. FILTER STONE SHALL BE WRAPPED IN NON-WOVEN GEOTEXTILE. NON-WOVEN GEOTEXTILE SHALL BE OVERLAPPED AS SHOWN.
4. IN THE LOCATION OF THE LYMAN STREET SIDEWALK, THE ENGINEERED BARRIER SHALL BE ASPHALT SO THAT THE SIDEWALK IS RESTORED TO ITS ORIGINAL LOCATION.
5. REFER TO THE TECHNICAL DRAWINGS OF THE FINAL RD/RA WORK PLAN FOR DESIGN DETAILS.
6. CUSHION GEOTEXTILE IN REQUIRED WHERE ENGINEERED BARRIER IS INSTALLED ABOVE EXISTING SIL/PAVEMENT.
7. THE CHANILINK FENCE SHALL BE INSTALLED ALONG LYMAN STREET SO THAT NO FENCE POSTS ARE INSTALLED WITHIN THE ANCHOR TRENCH.

LYMAN STREET SIDEWALK ANCHOR TRENCH

NOT TO SCALE

1



NOTES:

1. SOIL/BENTONITE SEAL TO CONSIST OF A MIXTURE OF SOIL FILL AND POWDERED BENTONITE. SOIL FILL SHALL BE UNIFORMLY BLENDED WITH 5 TO 10% BENTONITE.

MANHOLE DETAIL

NOT TO SCALE

2

GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
LYMAN STREET AREA REMEDIAL ACTION

REVISED ENGINEERED BARRIER DETAILS

TECHNICAL DRAWINGS

ARCADIS U.S., INC.
6723 TOWPATH ROAD
SYR., N.Y. 13214-0066
315.446.9120

ARCADIS Project No.
206.91

Date
JANUARY 2007

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Attachment 2

TABLE 1
BACKFILL SOURCE SAMPLING RESULTS

BROWNS PIT - DALTON, MA. SOIL FILL SAMPLING PROGRAM
LYMAN STREET AREA
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Parameter / Sample ID: / Date Collected:	Browns-Soilfill-C1 04/02/07
Volatile Organics	
2-Butanone	0.0040 J
Acetone	0.036
PCBs	
None Detected	--
Semivolatile Organics	
None Detected	--
Inorganics	
Arsenic	7.78
Barium	46.7
Beryllium	0.385 B
Cadmium	0.0767 B
Chromium	9.52
Cobalt	13.4
Copper	35.0
Lead	28.4
Mercury	0.0240
Nickel	24.4
Thallium	0.0549 B
Vanadium	14.1
Zinc	42.1

Notes:
1. Sample was collected by ARCADIS BBL, and submitted to SGS Environmental Services, Inc. for analysis of PCBs, volatiles, semivolatiles, and metals,
2. -- Indicates that all constituents for the parameter group were not detected.
3. Only detected constituents are summarized.

Data Qualifiers:

Organics (PCBs, volatiles, semivolatiles)
J - Indicates an estimated value less than the practical quantitation limit (PQL).

Inorganics
B - Indicates an estimated value between the instrument detection limit (IDL) and PQL.

TABLE 2
BACKFILL SOURCE SAMPLING RESULTS

PITTSFIELD SAND & GRAVEL - GRAVEL BACKFILL SAMPLING PROGRAM
LYMAN STREET AREA
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Parameter / Sample ID: / Date Collected:	PSG-Gravel-C1 04/02/07
Volatile Organics	
Acetone	0.048
PCBs	
None Detected	--
Semivolatile Organics	
None Detected	--
Inorganics	
Antimony	0.0559 B
Arsenic	6.09
Barium	34.1
Beryllium	0.295 B
Chromium	12.9
Cobalt	8.64
Copper	21.1
Lead	9.89
Mercury	0.00587 B
Nickel	16.6
Thallium	0.0414 B
Vanadium	11.8
Zinc	46.5

Notes:
1. Sample was collected by ARCADIS BBL, and submitted to SGS Environmental Services, Inc. for analysis of PCBs, volatiles, semivolatiles, and metals,
2. -- Indicates that all constituents for the parameter group were not detected.
3. Only detected constituents are summarized.

Data Qualifiers:

Inorganics

B - Indicates an estimated value between the instrument detection limit (IDL) and practical quantitation limit (PQL).

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Attachment 3

Preliminary analytical data
Subject to verification

Common Fill Material and Dense Grade Material from the old Water Treatment Plant (Parcel I8-23-6) Stockpile Characterization
Analytical Results
GE-Pittsfield/Housatonic River Project 1.5 Mile Removal Action
Pittsfield, MA

(Results are presented in part per million, ppm)

Location ID	OT000421	OT000422	OT000423		
Field Sample ID	H2-OT000421-0-6S13	H2-OT000422-0-6S13	H2-OT000423-0-6S13	Region IX Preliminary Remediation Goals	MCP Wave 2 Method 1 S-1 Standard
Date Collected	09/13/2006	09/13/2006	09/13/2006		
Location	Parcel I8-23-6	Parcel I8-23-6	Parcel I8-23-6	Residential	Residential
Stockpile Location	Area 64A North	Area 64C North	Area 64C North		(lowest)
Material Type	Dense Grade	Common Fill	Common Fill		
Analyte					
PCBS					
AROCLOR-1254	0.083	0.19	ND	N/A	2.0
AROCLOR-1260	0.11	0.34	0.043	N/A	2.0
PCB, TOTAL	0.19	0.53	0.043	2.0 (1)	2.0
APP IX SEMIVOLATILES					
ACENAPHTHYLENE	ND	0.017 J	ND	55*	100
ACETOPHENONE	ND	ND	0.024 J	0.49	N/A
ANTHRACENE	0.018 J	0.023 J	ND	14,000	1,000
BENZO(A)ANTHRACENE	0.083 J	0.13 J	0.043 J	0.56	7
BENZO(A)PYRENE	0.083 J (2)	0.15 J (2)	0.066 J (2)	0.056	2
BENZO(B)FLUORANTHENE	0.055 J	0.13 J	0.060 J	0.56	7
BENZO(GHI)PERYLENE	0.075 J	0.11 J	0.036 J	55*	1,000
BENZO(K)FLUORANTHENE	0.084 J	0.11 J	0.049 J	5.6	70
CHRYSENE	0.10 J	0.16 J	0.058 J	56	7
DIBENZO(A,H)ANTHRACENE	ND	0.021 J	ND	0.056	0.7
FLUORANTHENE	0.21 J	0.23 J	0.077 J	2,000	1,000
INDENO(1,2,3-C,D)PYRENE	0.047 J	0.082 J	0.028 J	0.56	7
PHENANTHRENE	0.13 J	0.12 J	0.039 J	55*	100
PYRENE	0.20 J	0.27 J	0.089 J	1,500	1,000
APP IX VOLATILES					
	all non-detects	all non-detects	all non-detects		
METALS					
ANTIMONY	1.3	1.0	1.5	30	20
ARSENIC	2.6 (2)	4.0 (2)	4.6 (2)	0.38	20
BARIUM	18.9	24.8	18.1	5,200	1,000
BERYLLIUM	0.21	0.27	0.22	150	0.7
CHROMIUM	3.9	5.8	4.7	210	30
COBALT	4.3	4.8	5.0	3,300	N/A
COPPER	7.5	8.8	8.6	2,800	N/A
LEAD	6.0	6.4	5.5	400	300
NICKEL	8.0	7.0	7.9	1,500	20
VANADIUM	4.3	6.7	5.7	520	600
ZINC	28.2	29.9	27.9	22,000	2,500
INORGANICS					
CORROSIVITY BY PH (ph)	8.1	8.1	8.2	N/A	N/A
CYANIDE	ND	ND	ND	11*	N/A
IGNITABILITY (deg)	>150	>150	>150	N/A	N/A
PAINT FILTER LIQUIDS (ml)	Absent	Absent	Absent	N/A	N/A
PERCENT SOLIDS (%)	96.9%	91.7%	95.3%	N/A	N/A
SULFIDE	ND	ND	ND	350*	N/A

Notes:
(1) Based on spatial averaging approach in Consent Decree - Residential soil
(2) Exceeds Region IX Preliminary Remidiation Goals, however, levels are below MCP S-1 Standards for Residential Properties. Therefore, this material meets the criteria for unrestricted re-use.
* - No EPA Region 9 PRG exists for certain noncarcinogenic PAHs (i.e.,benzo(g,h,i)perylene, and phenanthrene), cyanide, or sulfide. The PRGs for naphtalene, hydrogen cyanide, and carbon disulfide, respectively, were used as surrogates.
Only detected constituents are summarized
J - Indicates an estimated value
ND - not detected

9/22/2006

Common Fill Material at the old Water Treatment Plant (Parcel I8-23-6) Stockpile Characterization
Analytical Results
GE-Pittsfield/Housatonic River Project 1.5 Mile Removal Action
Pittsfield, MA

(Results are presented in part per million, ppm)

Location ID	OT000410		
Field Sample ID	H2-OT000410-0-6G31	Region IX Preliminary Remediation Goals	MCP Wave 2 Method 1 S-1 Standard
Date Collected	08/31/2006		
Location	Parcel I8-23-6	Residential	Residential
Stockpile Location	Area 64B North		
Material Type	Common Fill		
Analyte			(lowest)
PCBS			
AROCLOR-1254	0.035	N/A	2.0
AROCLOR-1260	ND	N/A	2.0
PCB, TOTAL	0.035	2.0 (1)	2.0
APP IX SEMIVOLATILES			
BENZO(A)ANTHRACENE	.086 J	0.56	7
BENZO(A)PYRENE	.11 J (2)	0.056	2
BENZO(B)FLUORANTHENE	.079 J	0.56	7
BENZO(GHI)PERYLENE	.094 J	55*	1000
BENZO(K)FLUORANTHENE	.093 J	5.6	70
CHRYSENE	.095 J	56	7
DIBENZO(A,H)ANTHRACENE	.021 J	0.056	0.7
FLUORANTHENE	.14 J	2,000	1000
INDENO(1,2,3-C,D)PYRENE	.067 J	0.56	7
PHENANTHRENE	.033 J	55*	100
PYRENE	.17 J	1500	1000
APP IX VOLATILES			
2-BUTANONE	.0044 J	6,900	0.3
ACETONE	.032	1,400	3
CARBON DISULFIDE	.0029 J	350.0	N/A
METALS			
ANTIMONY	0.45	30	20
ARSENIC	3.9 (2)	0.38	20
BARIUM	19.6	5,200	1,000
BERYLLIUM	0.20	150	0.7
CADMIUM	0.20	37	2.0
CHROMIUM	4.8	210	30
COBALT	5.1	3,300	N/A
COPPER	9.0	2,800	N/A
LEAD	4.0	400	300
NICKEL	8.4	1,500	20
SELENIUM	0.74	370	400
VANADIUM	6.0	520	600
ZINC	30.9	22,000	2,500
INORGANICS			
CORROSIVITY BY PH (ph)	8.2	11*	N/A
CYANIDE	ND	N/A	N/A
IGNITABILITY (deg)	>150	N/A	N/A
PAINT FILTER LIQUIDS (ml)	Absent	N/A	N/A
PERCENT SOLIDS (%)	91.2%	N/A	N/A
SULFIDE	ND	350*	N/A

Notes:
(1) Based on spatial averaging approach in Consent Decree - Residential soil
(2) Exceeds Region IX Preliminary Remidiation Goals, however, levels are below MCP S-1 Standards for Residential Properties. Therefore, this material meets the criteria for unrestricted re-use.
* - No EPA Region 9 PRG exists for certain noncarcinogenic PAHs (i.e.,benzo(g,h,i)perylene, and phenanthrene), cyanide, or sulfide. The PRGs for naphtalene, hydrogen cyanide, and carbon disulfide, respectively, were used as surrogates.
Only detected constituents are summarized
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ND - not detected