



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Electronic Mail/Overnight Delivery

April 25, 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
Supplemental Information Package Addendum**

Dear Mr. Tagliaferro:

This letter addresses recent comments provided by the U.S. Environmental Protection Agency (EPA) in an April 16, 2007 letter conditionally approving the General Electric Company's (GE's) March 29, 2007 submittal of the *Supplemental Information Package* (SIP) regarding the Lyman Street Area – Properties East of Lyman Street. The SIP contained certain Contractor-specific information and implementation details for the remediation actions to be performed at the portion of the Lyman Street Area east of Lyman Street.

In its April 16, 2007 conditional approval letter, EPA requested additional information regarding two comments. Each of these comments and GE's response are provided below.

EPA Comment:

For the area north of the engineered barrier on parcel I9-8-1 that is subject to Natural Resource Restoration/Enhancements, GE shall provide a revised grading plan that illustrates and requires the placement of a minimum of three inches of topsoil to support the growth and sustainability of future vegetation in this area.

GE Response:

As shown on Attachment 1, a revised final grading plan has been prepared for the northern portion of Parcel I9-8-1. As part of the revised final grades, 3 inches (minimum) of topsoil will be placed above imported soil fill material.

EPA Comment :

GE shall provide characterization data for excavated material that requires disposal if the disposal method/facility differs from what was proposed in the Final RD/RA Work Plan. This includes but is not limited to, the temporary gravel road that currently traverses the WMECO property, anchor trenches, and any excavation of material beyond that depicted on Figure 3 of Attachment A to the Final RD/RA Work Plan. Any material that GE proposes to place in the Hill 78 OPCA will require EPA approval.

GE Response:

Based on the results of the pre-design investigation (which determined that PCBs were present in several samples at levels greater than 50 ppm), it has been determined that existing soils subject to excavation will be transported off-site as Toxic Substances Control Act (TSCA) regulated material. In addition, to determine whether such soils may also be subject to Resource Conservation and Recovery Act (RCRA) disposal regulations, additional characterization data was collected for the soils identified for excavation; the results were provided to EPA in Table 9-2 of GE's *Monthly Status Report Pursuant to Consent Decree for March 2007* on April 9, 2007. The data indicated that the soils are not RCRA regulated.

Any additional soil material that is excavated which has not been characterized (e.g., the temporary road that traverses the WMECO property, anchor trenches that require excavation of existing soil) will be disposed of as TSCA regulated material as proposed in the Final RD/RA Work Plan. In addition, such materials will be subject to Toxicity Characteristic Leaching Procedure (TCLP) analysis prior to disposal to determine if the material is RCRA regulated. TCLP data for this material will be provided to the EPA in a separate letter once received by GE from the laboratory.

We trust the above responses are sufficient to address EPA's comments and that on-site remediation activities will commence no later than May 7, 2007. If you have any further questions, please feel free to contact me.

Sincerely,



Richard W. Gates
Remediation Project Manager

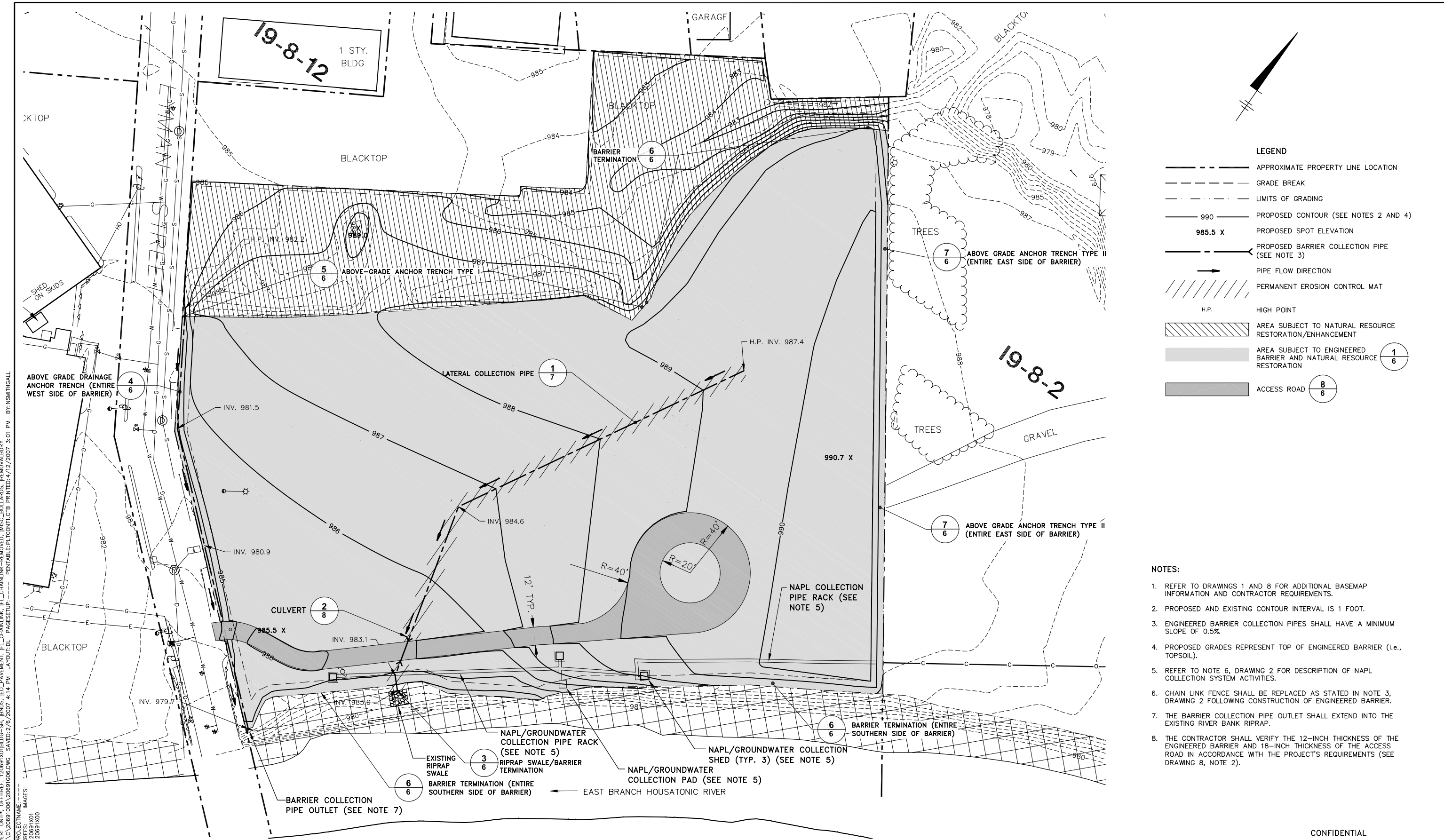
CAA/cmb
Attachments

cc: Tim Conway, EPA
John Kilborn, EPA
Holly Inglis, EPA
Rose Howell, EPA*
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
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Nancy E. Harper, MA AG*
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Pittsfield Department of Health
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James Bieke, Goodwin Procter LLP
Barbara Charest, Northeast Utilities Service Co.
Charles Nicol, Northeast Utilities Service Co.
Robert Dvorchik, Western Mass. Electric Co.
John Tulloch, Western Mass. Electric Co.
Public Information Repositories
GE Internal Repository
* *without attachments*

Attachment 1

Revised Final Grading Plan



PROJECT NAME: 20691X00
 SHEET NO.: 19-8-12
 DATE: 1/12/2007
 DRAWN BY: RWP
 CHECKED BY: NES
 PROJECT NO.: 206.91
 SCALE: 1" = 30'
 PLOT DATE: 1/12/2007 4:14 PM
 PLOT SCALE: 1/8" = 1'-0"

ORIGINAL SCALE APPLIES TO 22"x34" DRAWING
 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 |
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| | | | |

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

GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
 LYMAN STREET AREA REMEDIAL ACTION
ENGINEERED BARRIER
FINAL GRADE PLAN
 TECHNICAL DRAWINGS

CONFIDENTIAL
 ARCADIS Project No. 206.91
 Date JANUARY 2007
 ARCADIS U.S., INC.
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