

08-0151  
SDMS: 205003

**United States Environmental Protection Agency**  
**EPA New England**  
**One Congress Street, Suite 1100**  
**Boston, MA 02114-2023**

April 22, 2004

Mr. Andrew T. Silfer, P.E.  
Corporate Environmental Programs  
General Electric Company  
100 Woodlawn Avenue  
Pittsfield, Massachusetts 01201

**RE: Comments on GE's 2003 Annual Monitoring Report**  
**Upper ½-Mile Reach Removal Action**  
**General Electric-Pittsfield/Housatonic River Site**

Dear Mr. Silfer:

On February 11, 2004, GE submitted a document entitled *2003 Annual Monitoring Report, Upper ½-Mile Reach of the Housatonic River* (February 2004). This document was submitted pursuant to the requirements contained in the *Removal Action Work Plan for Upper ½-Mile Reach of Housatonic River* (the "Work Plan") (BBL, 1999). Although the Work Plan does not require EPA to review and approve this document, EPA reviewed the *Monitoring Report* and has the following comments. Also, note that the Natural Resource Trustees provided comments on the *Monitoring Report* under separate cover.

**Section 3. Restored Bank Erosion Monitoring**

Although the Work Plan allows GE to exclude the 170-foot section of the river bank excavated and restored as part of the Building 68 Removal Action from the restored bank monitoring and response requirements, EPA recommends GE include this area in the ½-Mile inspection and documentation process. Although the 170-foot section of the river bank is excluded from the monitoring requirements of the Work Plan, if EPA observes significant erosion and potential recontamination of the Housatonic River from this section of the river bank, EPA may request that GE take corrective action under other provisions of the Consent Decree and/or other EPA regulations.

**Table 7-1 Post-Removal Cages Mussel Study**

Please provide a brief report that summarizes the Pre-Removal, During Removal and Post Removal Caged Mussel Study Results. Please supplement the data provide in this table with sample dates and estimated river flows (a range over the sample period is acceptable) and include a footnote that for the Post-Removal Caged Mussel Study, EPA's temporary dam was in place between Lyman and Elm Street that significantly affected river flows.

**Table 8-1 Summary of Future Post-Construction Monitoring Activities**

**CAP-Mon-1 through CAP Mon-8/Footnote 3.** EPA concurs with GE's proposal to collect all eight isolation layer samples in 2007.

**Restored Sediments/Footnote 4.** There is an error in the footnote. Five year sampling should occur in the following years: 2007, 2012 and 2017. The footnote indicates sampling will be performed in 2007, 2011, and 2015. Please correct in the 2004 Annual Report.

EPA's comments on this submittal do not preclude EPA from requiring additional investigations and response activities pursuant to the Consent Decree, the Upper ½-Mile Reach Removal Action Work Plan and/or the *Statement of Work for Removal Actions Outside the River* (Appendix E to the Consent Decree).

If you have any questions, please contact me at (413) 236-0969.

Sincerely,



Dean Tagliaferro

cc: Holly Inglis, EPA  
Dale Young, MA EOE  
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