

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

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REGIONAL PLANNING COMMISSION

September 27, 2000

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

**RE: Conditional Approval of GE's September 20, 2000 Submittal entitled *Proposal to Install Monitoring Wells Adjacent to Cells G1/G2, Upper 1/2 -Mile Reach Removal Action* GE-Pittsfield/Housatonic River Site**

Dear Mr. Silfer:

On September 20, 2000, General Electric (GE) submitted the above-referenced document to EPA and the Massachusetts Department of Environmental Protection (DEP). This submittal is subject to the terms and conditions specified in the Consent Decree that was lodged in District Court on October 7, 1999 (the "Consent Decree"). Pursuant to Paragraph 73(b) of the Consent Decree, EPA, after consulting with the Massachusetts DEP, approves the above-referenced submittal subject to the following conditions:

1. GE shall provide EPA with a minimum of three days notice prior to initiating field activities to allow EPA to arrange for oversight.
2. GE shall install the center well one to two feet into the top of the till and shall install a 10-foot screen beginning approximately one foot below the top elevation of till. EPA acknowledges that this is a modification to EPA's July 19, 2000 conditional approval letter for GE's *Proposal to Address the Presence of DNAPL in Cell G1*.
3. GE shall ensure that their contractor has the equipment and supplies required to convert to the cash and wash well installation method and that GE's contractor converts to case and wash, if necessary, for proper well installation.
4. EPA disagrees with GE's proposal to use the center well to fulfill EPA's request for an additional well (EPA-4) identified in EPA's August 24, 2000 comment letter on GE's April 2000 *Baseline Monitoring Program Proposal for Plant Site I Groundwater Management Area*. This is because the sheetpile barrier will alter the groundwater flow patterns in the immediate area and could potentially prevent the well from adequately monitoring upgradient contaminant sources.

However, EPA will approve the western most (downstream) perimeter well, if subsequently proposed by GE, as fulfilling EPA's request for an additional well (EPA-4).

5. GE shall monitor the three wells weekly until GE proposes, and EPA concurs with, an alternate monitoring frequency.

6. As we discussed on September 26, 2000, GE will install the upstream perimeter well and the center well within three weeks of receiving this conditional approval letter. GE will install the downstream perimeter well within three weeks of the completion of construction activities associated with Cell G2 of the Upper ½-Mile Reach Removal Action. GE will submit the evaluation report referenced on page 2 of GE's current submittal within six weeks of initiation of weekly monitoring of the downstream monitoring well.

EPA's approval of this submittal does not preclude EPA from requiring additional investigations and response activities pursuant to the Consent Decree and/or the *Statement of Work for Removal Actions Outside the River* (Appendix E to the Consent Decree) in the future. Furthermore, in the event the Consent Decree does not get entered by the Court, EPA reserves the right to require additional investigations and response activities pursuant to its statutory and regulatory authorities reserved under the Consent Decree including, but not limited to, the Resource Conservation and Recovery Act ("RCRA") and the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA").

If you have any questions, please contact me at (617) 918-1282.

Sincerely,

  
Dean Tagliaferro  
On-Scene Coordinator

cc: Bill Horne, GE  
John Novotny, GE  
Andrew J. Thomas, Jr. GE  
J. Lyn Cutler, MA DEP  
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