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SDMS: 159200

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

December 26, 2000

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

**RE: Conditional Approval of GE's Contingency Plan for NAPL remaining in Cell G2  
Upper ½-Mile Reach Removal Action  
General Electric-Housatonic River Site, Pittsfield, Massachusetts**

Dear Mr. Silfer:

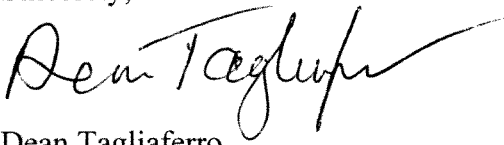
On December 19, 2000, GE submitted a document entitled *GE-Pittsfield/Housatonic River Site; Upper ½-Mile Reach Removal Action (GECD800); Contingency Plan for NAPL remaining in Cell G2*. This document is subject to the terms and conditions specified in the Consent Decree that was entered in District Court on October 27, 2000 (the "Consent Decree"). Pursuant to the Upper ½-Mile Reach Removal Action Work Plan and Paragraph 73(b) of the Consent Decree, EPA, after consulting with the Massachusetts DEP, approves the above-referenced submittal subject to the following conditions:

- EPA may require modifications of the proposed backfill material below the proposed HDPE liner to facilitate NAPL collection. This may include, but is not limited to, the placement of a thicker washed gravel layer and a thinner layer of isolation material.
- GE has the option of placing stone or a sand/stone mix for backfill adjacent to the permanent sheetpile wall up to elevation 967 to facilitate in NAPL recovery and groundwater control. GE may also use stone backfill to mitigate the effects of boils or quick conditions, should they occur.

EPA's conditional 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, this conditional approval letter does not modify any of the performance standards contained in the Upper ½-Mile Reach Removal Action Work Plan, the Consent Decree 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 (617) 918-1282.

Sincerely,



Dean Tagliaferro

cc: Tim Conway, EPA  
Bryan Olson, EPA  
Mike Nalipinski, EPA  
Holly Inglis, EPA  
J. Lyn Cutler, DEP  
Sue Steenstrup, DEP  
Andrew Thomas, GE  
William Horne, GE  
Mark Gravelding, BBL  
Ray Goff, USACE  
Site File