

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

December 11, 2000

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

**RE: Interim Conditional Approval of GE's Cell G2 NAPL Submittals**  
**Upper ½-Mile Reach Removal Action**  
**General Electric-Housatonic River Site, Pittsfield, Massachusetts**

Dear Mr. Silfer:

GE has submitted the following documents regarding the Non-Aqueous Phase Liquids (NAPLs) uncovered at Cell G2 of the Upper ½-Mile Reach Removal Action:

- *GE-Pittsfield/Housatonic River Site; Upper ½-Mile Reach Removal Action (GECD800); Results of Cell G2 NAPL Investigation and Proposal to Address the Presence of LNAPL in Cell G2 (November 17, 2000).*
- *GE-Pittsfield/Housatonic River Site; Upper ½-Mile Reach Removal Action (GECD800); Revised Figure 5 for Cell G2 NAPL Investigation Proposal (November 27, 2000).*
- Short-term structural analysis of the proposed Waterloo sheetpile wall, By Maxymillian Technologies, Inc (dated 12/5/00; provided to EPA by GE on 12/6/00).

The above-referenced documents submitted by GE are subject to the terms and conditions specified in the Consent Decree that was entered in District Court on October 27, 2000 (the "Consent Decree"). EPA continues to review the submittals in their entirety. However, in response to requests from GE, EPA agreed to expedite the review of individual components of the submittals. On December 1 2000, EPA issued an interim conditional approval delineating the upstream limits of the proposed Waterloo sheetpile. This allowed GE to install an intermediate cut-off wall in Cell G2 and restore the upstream of Cell G2.

EPA has completed the review of the submittals excluding the groundwater modeling, monitoring and potential for groundwater recovery components. EPA will respond to these issues in the near the future.

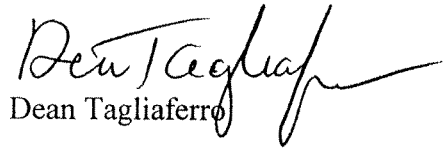
Therefore, pursuant to the Upper ½-Mile Reach Work Plan and Paragraph 73(b) of the Consent Decree, EPA, approves the above-referenced submittals subject to the following conditions:

- GE shall extend the horizontal extent of the permanent sheetpile wall a minimum of 20 feet downstream to ensure that the downstream boundary of Former Oxbow H is within the limits of the permanent sheetpile wall. Further extensions of the sheetpile wall may be necessary based on conditions observed during the excavation of bank soils proposed in the above-referenced submittals and based on the extent of NAPL present in Cell G3.
- GE shall re-excavate the entire surface of Cell G3 downstream of the intermediate cut-off wall a minimum of two inches to ensure that any residual NAPL or NAPL-impacted sediments that resulted from the flooding of the cell are removed.
- GE shall resurvey the entire surface of Cell G3 downstream of the intermediate cut-off wall to ensure the required excavation depths have been achieved.
- GE shall install temporary recovery wells or sumps on the river side of the proposed sheetpile to allow for the removal of NAPL during excavation, backfilling and grouting operations. The wells/sumps should be located as close to the NAPL source as possible to prevent migration of NAPL during the response action.
- GE has the option to place 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, however, GE shall ensure that the final restoration meets the minimum thicknesses for the isolation and armor layers, as specified in the Upper ½-Mile Reach Work Plan.
- GE shall submit a contingency plan within seven days of receipt of this letter to install a NAPL collection system and/or impermeable cap in the event that NAPL or NAPL-impacted sediments remain following excavation activities.

Note that EPA discussed these conditions at the December 6, 2000 weekly meeting and gave GE verbal conditional approval on the minimum 25 foot length of the Waterloo sheetpile and the minimum horizontal extent of the Waterloo sheetpile.

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  
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