

SDMS: 159273

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

January 18, 2001

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

RE: Conditional Approval of GE's submittal entitled *Revised 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 January 15, 2001, GE submitted a document entitled *Revised 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(h) of the Consent Decree, EPA, after consulting with the Massachusetts DEP, approves the above-referenced submittal subject to the following conditions:

1. It is unclear where the well screen will be placed if the actual distance from the HDPE liner to the bottom of the sump exceeds six feet (i.e., the length of the well screen and the one foot sump). EPA recommends that the top of the slotted well be set at or above the HDPE liner to allow for LNAPL, if present, to infiltrate the well. The bottom elevation of the well will then be dictated by length of the screen and well sump and the corresponding angle of the well.
2. In GE's December 19, 2000 submittal entitled *Contingency Plan for NAPL Remaining in Cell G2*, GE proposed to remove NAPL from the well only if NAPL levels exceeded six inches. Based on the conditions observed during the excavation of Cell G2, EPA believes this criteria no longer appropriate. Therefore, unless EPA subsequently approves a modified NAPL recovery protocol, GE shall:
 - Notify EPA within 24 hours if NAPL is present in the recovery well; and,
 - Remove any recoverable NAPL, regardless of NAPL thickness.

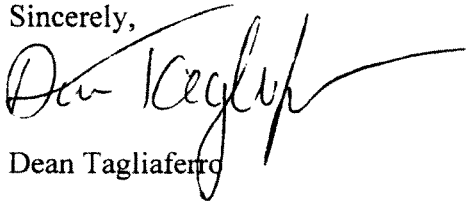
Following the initial six week monitoring period, GE shall propose for EPA approval a long-term schedule and procedure for additional monitoring and/or NAPL recovery.

3. Conditions and approvals cited in the letter for actions involving NAPL/groundwater monitoring, assessments, reporting and response actions are subject to further review and potential modification by EPA during the implementation of Technical Attachment H to Appendix E of the Consent Decree.

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
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Site File