



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

November 25, 2008

Mr. Richard W. Gates  
Corporate Environmental Programs  
General Electric Company  
159 Plastics Avenue  
Pittsfield, MA 01201

via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's August 29, 2008 submittal titled  
Groundwater Management Area 1, *NAPL Monitoring Report for Spring 2008*,  
GE-Pittsfield/Housatonic River Site

Dear Mr. Gates:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *NAPL Monitoring Report for Spring 2008* (the Report). The Report is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the Report subject to the following conditions.

1. For all NAPL monitoring activities that are conducted on a quarterly basis or less, GE shall provide EPA with a minimum of one week notice as stated on page 29 of the Report. This shall include, but not be limited to, the semi-annual bank inspections that are conducted to verify compliance with NAPL Performance Standard No. 1 and in accordance with Condition 2 of EPA's June 30, 2003 conditional approval letter (CAL) for the Fall 2002 NAPL monitoring report. The timing of this notice shall be based on an acknowledgement by EPA that such notice has been received.

Absent such notification, the scheduling of such inspections shall be subject to change based on the availability of EPA oversight personnel. GE shall make best efforts to notify EPA of bank inspections that are conducted during high river flow events as described in the June 30, 2003 CAL. For all NAPL monitoring activities that are conducted at greater than a quarterly frequency, GE shall provide EPA with prior notice of at least one week when feasible if any scheduling or protocol modifications to the required procedures are anticipated.

2. GE shall evaluate compliance with NAPL Performance Standard No. 5 in subsequent reports under the Decree by adding a new section to NAPL monitoring reports that

identifies buildings and residences within NAPL areas where GW-2 standards are applicable. This shall include, but not necessarily be limited to, any building that has been within 30 ft of a NAPL plume, both presently and historically, and where the average depth to groundwater is within 15 ft of the ground surface. This shall include an updated figure (similar to Figure 11 of the September 2000 Baseline Monitoring Program Proposal for Plant Site 1 Groundwater Management Area) illustrating areas within GMA 1 where the average depth to groundwater is within 15 feet of the ground surface, utilizing groundwater elevation data collected between 2000 and 2008.

3. The illustration of the RW-4 cone of depression shown on Figure 8 indicates a zone of influence over the leading edge of the NAPL plume extending to monitoring well GMA1-19. However, that depiction is uncertain since there are no intermediate monitoring points located between well GMA1-19 and recovery well RW-4. GE shall evaluate the need for additional NAPL control/recovery measures in this area, including increasing the drawdown at well RW-4, to further ensure that LNAPL migration is controlled in this area.

4. GE notes in Section 4.3 that groundwater elevation readings for certain wells are measured during the survey of other GMAs (per page 28, several GMA-1 wells are monitored during the GMA-2 monitoring round). GE notes that these wells will be monitored within the same general timeframe as the rest of the GMA-1 wells. Because of these commingled groundwater elevation measurements, along with the fact that groundwater elevations from various GMAs can be shown on a common drawing, GE shall use best efforts to ensure that all groundwater elevations are collected within a one week period.

In addition, during NAPL monitoring rounds, GE shall also note the flow in the Housatonic River as measured at Coltsville, and include this information in subsequent NAPL reports under the CD.

5. For all wells that are monitored for DNAPL, GE shall measure the depth to the bottom of the well and compare this measurement to the screen bottom elevation as given in the construction details. A comparison of these values and a description of any sediment deposition within the wells shall be given in the next NAPL monitoring report. If the comparison for any well shows that the ability to measure DNAPL is compromised, GE shall take corrective measures to ensure the well's effectiveness.

6. GE describes well LS-43 in Table 2 as covered over in asphalt. GE shows this well on Figure 6 as having no DNAPL found. GE shall not show wells as having no NAPL found if GE did not actually conduct a measurement at a given well. GE shall also uncover this well, verify its integrity (report any differences with the construction details given in Table 1), and resume monitoring this well in accordance with Table 2. If this is not possible, GE shall replace well LS-43.

7. GE states in Table 2 that wells ES2-14, 15, and 17 are not being monitored because EPA staging is preventing well access. EPA is no longer using this area for staging,

therefore, GE shall verify the integrity of these wells (report any differences with the construction details given in Table 1) and resume monitoring them in accordance with Table 2.

8. GE has reported no LNAPL recovery with the Southside Recovery System. GE shall conduct an inspection to verify the proper operation of this NAPL recovery system. GE shall provide a minimum of two weeks notice to EPA and schedule the inspection so that EPA can observe this inspection.

9. In order for GE to evaluate compliance with NAPL Performance Standards 1 and 4, in the next report GE shall provide a river bank inspection protocol, checklist, and Figure.

EPA reserves all of its rights under the Decree, including but not limited to, the right to perform and/or require additional sampling or response actions, if necessary, to meet the requirements of the Consent Decree. If there is any conflict between the Performance Standards as stated in the Report and the Performance Standards as stated in the Consent Decree and SOW, the Consent Decree and SOW shall control.

If you have any questions, please contact me at (617) 918-1721.

Sincerely,



Richard Fisher  
GE Facility Project Manager

cc:

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