



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

October 22, 2008

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

Via Electronic and U.S. Mail

Re: EPA Conditional Approval of General Electric's August 1, 2008 *Groundwater Management Area 2 Long-Term Monitoring Program Monitoring Event Evaluation Report for Spring 2008*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's August 2008 *Groundwater Management Area 2 Long-Term Monitoring Program Monitoring Event Evaluation Report for Spring 2008* (the "Report"). This letter 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, in consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the Report based on the following conditions.

1. As previously indicated in its October 9, 2007, Conditional Approval of General Electric's June 15, 2007, submittal titled *Groundwater Management Area 2 Baseline Assessment Final Report and Long-Term Monitoring Program Proposal*, EPA does not concur with GE's conclusion that there is no significant seasonal variability of the results at GMA 2. Specifically, TCE data from monitoring well OJ-MW-2 show higher results during fall monitoring rounds versus the results from the spring monitoring rounds as well as showing an upward trend over time when the fall and spring results are considered separately. Additional TCE data from monitoring well OJ-MW-2 will be necessary to further assess seasonal variations.
2. During all future monitoring events, GE shall make every effort to measure groundwater elevations on a single day and to collect groundwater samples on a single day. The condition for measuring groundwater elevations on a single day was previously included in EPA's March 15, 2007, Conditional Approval of General Electric's January 30, 2007, submittal titled *Groundwater Management Area 2 (GECD320) Groundwater Quality Monitoring Report for Fall 2006*. Also, at the time of the collection of groundwater

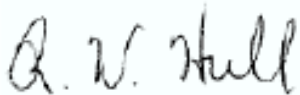
samples, GE shall note the groundwater elevation for each well and the flow in the Housatonic River as measured at Coltsville, and include this information in the groundwater reports.

3. GE shall note a typographical error in the last sentence of paragraph 4 on page 20. The sentence reads, in part, "...changes in TOC..." but should read "...changes in VOC...". GE shall make note of the error in the next groundwater monitoring report for GMA 2.
4. In all future reports, GE shall revise Figure 5, and any other figures depicting wells at GMA 4, to show newly located wells OPCA-MW-1RR and OPCA-MW-2R that were installed to replace decommissioned wells OPCA-MW-1R and OPCA-MW-2.
5. EPA does not concur with GE's assertions in sections 1.2 and 4.4 about the potential sources of contamination to GMA-2 and the potential for groundwater flow between GMAs. Therefore, EPA reserves the right to require that GE expand the monitoring and response requirements in GMA-2 if groundwater monitoring at either GMA-4 or GMA-1 indicates an increase in groundwater contaminant concentrations and/or if other factors or information warrant additional response actions.

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) 918-1882.

Sincerely,



Richard W. Hull  
GE Facility Project Manager

cc:

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