



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

April 8, 2009

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 February 6, 2009 submittal titled  
Groundwater Management Area 2, *Long-Term Monitoring Program Monitoring Event  
Evaluation Report for Fall 2008*, GE-Pittsfield/Housatonic River Site

Dear Mr. Gates:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Long-Term Monitoring Program Monitoring Event Evaluation Report for Fall 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 and the proposed groundwater monitoring described therein, subject to the following conditions.

1. In Section 4.4.1, GE assesses groundwater VOC data, including discussing potential upgradient sources based on data from GMA-1 and GMA-4 wells. In this discussion, GE cites data for trans-1,2-dichloroethene and vinyl chloride for GMA-1 well ES1-5 which were "well below" applicable Performance Standards during 4 out of 6 prior sampling events. EPA notes that other VOC data, including 1,1-dichloroethane, trichloroethene, and tetrachloroethene have also been detected at well ES1-5, a well located on the downgradient periphery of GMA-1. Some of this VOC data is within one-half the currently applicable Performance Standard, which EPA would not consider well below. Similar and related chlorinated compounds have been detected during past monitoring events at GMA-2 wells downgradient of this well. Therefore, EPA believes that GMA-1 may be an upgradient source of contamination to GMA-2.

Thus, EPA does not concur with GE's assertions in this Section 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.

2. GE states on page 23 in the Overall Assessment of Groundwater Data Quality, that

tetrachloroethene detected on the adjacent GMA-4 property has never been found in the wells at GMA-2. EPA notes that vinyl chloride, a product of tetrachloroethene degradation, has in fact been found in GMA-2 at downgradient locations from the wells in GMA-4 where the tetrachloroethene has been found. In future reports, such discussions of groundwater quality shall consider the potential transition of constituents to daughter products and their movement with, and within, groundwater flows.

Furthermore, in section 1.2.3 GE does not identify GMA-4 as a potential source of VOC contamination to GMA-2. Based on the groundwater flow contours, the VOC contamination in groundwater wells at the downgradient boundary of GMA-4, and the fact that vinyl chloride is a degradation byproduct of tetrachlorethene, EPA continues to assert that GMA-4 is a potential source of VOC contamination to the eastern portion of GMA-2. Therefore, GE shall continue to assess whether or not GMA-4 is a potential source of contamination to GMA-2.

3. In response to Condition 4 in the January 27, 2009 Conditional Approval Letter for GMA-4 Groundwater Quality Monitoring Interim Report for Spring 2008, GE has proposed to sample GMA-2 well OJ-MW-1 for VOCs, along with well GMA4-5 and a new well couplet to be installed near the intersection of East Street and Commercial Street, to assess the presence of VOCs downgradient of the eastern portion of GMA-4. That sampling will be performed as part of the annual interim sampling events conducted for GMA-4, with the next sampling round scheduled for Fall 2009.

GE shall consider OJ-MW-1 as a GW-2 compliance well for VOCs and shall incorporate all data from well OJ-MW-1 obtained during the GMA-4 downgradient assessment in future GMA-2 monitoring reports and compare the results to the GW-2 Performance Standards. Prior to monitoring OJ-MW-1, GE shall verify the integrity of, and, if necessary, re-develop, repair, and/or replace the well.

4. Note that in Section 2 of the Report regarding groundwater sampling activities, GE does not discuss information provided on the sampling log indicating that two feet of sediment were measured in well OJ-MW-2 and the inner locking plug for the well was missing. For future groundwater monitoring events, GE shall discuss relevant notes on field sheets describing conditions that may influence the integrity of each well, including well security, missing covers, submersion in puddles, measured sedimentation, evidence of inflow, etc. Issues regarding well integrity and security shall be noted in all future groundwater reports.


5. GE shall develop well OJ-MW-2 a minimum of one week prior to the next monitoring event due to the two feet of sediment that have accumulated in the well. Additionally, if the well is not replaced GE shall evaluate the cause of this deposition, and shall take appropriate measures to mitigate. Since well OJ-MW-2 is one of the two wells scheduled to be sampled in Spring 2009, GE shall delay its sampling of the other well (GMA2-10) until well OJ-MW-2 is re-developed or a replacement well is installed and developed.

6. EPA requests that GE provide detection limits in each of Tables 5, 6, and 7, or their equivalents, in future reports where PCBs are not detected.

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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|----------------------------------|---|
| Dean Tagliaferro, US EPA         | Mike Carroll, GE                                    |
| Tim Conway, US EPA               | Rod McLaren, GE                                     |
| Linda Palmieri, Weston Solutions | James Bieke, Goodwin Procter                        |
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| Public Information Repositories  | Pittsfield Commissioner of Public Health            |