



**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 13, 2009 submittal titled
Groundwater Management Area 5, *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. For the sampling log at well GMA5-9, GE has recorded a drawdown in excess of the 0.3 foot displacement goal established in GE's Field Sampling Plan. In addition, the Groundwater Sampling Log shows an increase in turbidity during the final five measurements collected after the pumping rate was decreased. Since the groundwater level had decreased to a point below the top of the bladder pump such that depth to water readings could not be collected, it is uncertain whether the water level was continuing to decrease, had stabilized, or was increasing back toward static levels. Although all field parameter readings were within the criteria to define stabilization, GE could have conducted additional activities to further verify that the well was not being placed under stress at the time of sampling such as:

- reducing the pump rate to the minimum rate as soon as excessive drawdown was observed;
- lowering the pump intake to allow depth to groundwater measurements to be collected for a greater period of time and possibly to a stabilized level; and
- continued purging until turbidity data showed a fluctuation between increasing and decreasing values indicative of stabilization or the well was purged dry.

During future sampling events, GE shall utilize field techniques that ensure that representative samples are collected (to the extent practicable) and shall provide an evaluation of the field methods relative to the low-flow sampling protocol contained in GE's EPA-approved Field Sampling Plan.

2. In Section 1.2.2 (Overview of Hydrogeologic Conditions at the Site) of future monitoring reports, GE shall mention that groundwater flow conditions were temporarily impacted by the presence of the sheetpiling and dam that were installed as part of EPA's 1.5 Mile Reach Removal Action, include the timeframe of the sheetpiling and dam installations and removal, and shall refer to GE's Spring 2006 GMA-5 Groundwater Quality Report which further discussed the impact of those barriers.

3. GE has based the cadmium data evaluation at well GMA5-4 on results showing detection limits greater than the applicable GW-3 groundwater standard. However, GE has advised EPA that the detection limit (MDL) [0.0019 ppm] utilized by the laboratory was less than the quantitation limits (QL) [0.01 ppm] presented by GE and will allow the non-detected results to be quantified to a level of 0.003 ppm, which is below the 0.004 ppm GW-3 Performance Standard for this constituent. In the next monitoring event evaluation report, GE shall present revised historical results for cadmium at well GMA5-4 reflecting the re-evaluated QL of 0.003 ppm and shall continue to monitor this well for cadmium until EPA approves a reduction or cessation of monitoring, but no sooner than following collection of four rounds of data that satisfy the standard, including the use of analytical results where the QL is less than applicable standards.


4. Section 4.4.1, Page 27. Note that the source of tetrachlorethene has not been definitively identified, and may or not be related to dry cleaning, laundry facilities or former GE operations at the Site.

5. Section 5.2 of GE's Report includes GE's view on the potential conclusions and actions following the Spring 2009 Monitoring event. EPA does not necessarily agree with GE's characterization and reserves all of its rights to review any GE proposal following that event.

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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