



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

November 5, 2008

Ms. Susan Svirsky
U.S. Environmental Protection Agency
c/o Weston Solutions, Inc.
10 Lyman Street
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
Rest of River (GEC850)
Time for Submission of Corrective Measures Study Supplement**

Dear Ms. Svirsky:

GE has reviewed EPA's letter and comments dated September 9, 2008, on GE's March 2008 Corrective Measures Study (CMS) Report for the Rest of River and has been working to formulate responses to those comments. In addition, GE recently received EPA's letter of October 30, 2008 containing additional, specific comments relating to the CMS Report.

EPA's September 9 cover letter requests that GE submit a CMS Supplement that addresses EPA's comments within 90 days from the date of that letter – i.e., by December 8, 2008. The letter also states that EPA will consider additional remedial alternatives beyond those described in the CMS Report, sets forth a process for developing such alternatives, and states that if EPA approves a Supplement to the CMS Proposal that describes those alternatives, EPA "may also consider a reasonable extension" to the 90-day timeframe for submittal of the CMS Supplement to incorporate the evaluation of those alternatives. GE has requested a meeting with EPA and state agencies to discuss the development of another remedial approach. During our discussions of that additional remedial approach, we can discuss any further modifications to the schedule that will be needed to allow for its development and evaluation.

In the meantime, GE has been evaluating EPA's comments relating to the current remedial alternatives and has concluded that it is not feasible to respond to those comments within 90 days. Many of those comments require information that EPA typically does not require at the CMS stage of the process. Some examples of the practical realities of responding to EPA's extensive comments (39 single-spaced pages containing 166 separate comments) are described below:

- EPA's comments state that GE should provide a detailed description both of the restoration process and of methods that may be used to restore affected habitats (General Comment 10). EPA would also have GE present a detailed discussion of the process to be used to avoid, minimize, or mitigate impacts of construction/remediation activities on the quality of life of affected communities and on species subject to the Massachusetts Endangered Species Act (MESA) (General Comment 16). Further, EPA has indicated that GE should identify a range of siting criteria and other design, construction, and restoration measures for the alternatives (Specific Comment 77). These detailed discussions of both process and methods will require considerable efforts by a team of experts, including some who were not involved in preparation of the CMS Report.
- In both General Comments 10 and 16 and Specific Comment 42, EPA indicated that GE should illustrate the process with an in-depth evaluation using specific areas that EPA would identify. EPA did not identify those areas until its letter of October 30, 2008, which identified six specific areas for an in-depth evaluation of how the specifics of the above-described processes would be applied to features of those areas. Conducting the detailed evaluations of these six areas will take a great deal of work, particularly for a range of remedial options that may affect these areas.
- EPA wants GE to prepare detailed substantive evaluations of applicable or relevant and appropriate requirements (ARARs), in tables following a five-column format specified by EPA, for each of the eight sediment alternatives, each of the seven floodplain alternatives, and each of the five treatment/disposition alternatives evaluated in the CMS (General Comments 27 and 29). EPA has specified that there should be separate evaluations for chemical-specific, location-specific, and action-specific ARARs. Moreover, for the on-site treatment/disposition alternatives, EPA has directed that GE identify potential locations for the disposition or treatment facilities and develop separate ARARs evaluation tables for each such location (General Comments 1 and 3). These comments will require over 60 ARARs evaluation tables, which will run, in total, several hundred pages.

The types of analyses that EPA wants to be included in these tables require some detailed analyses. For example, EPA has stated that, in assessing whether the temporary staging areas for excavated sediments and soils would meet the requirements of EPA's regulations under the Toxic Substances Control Act (TSCA) and Resource Conservation and Recovery Act (RCRA), GE should discuss "the uncertainties, including design uncertainties, and how such uncertainties could be avoided" (Specific Comment 5). Similarly, EPA has instructed GE to conduct a "comprehensive evaluation" of how each alternative would comply "with the substantive performance standards of MESA, including the compliance of each alternative with the performance standards associated with authorizing a 'take'

under MESA, and setting forth specific proposals on how compliance with the long-term Net Benefit standard will be achieved” (Specific Comment 21).

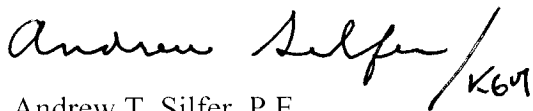
- EPA’s comments will require GE to reconsider many of its cost estimates, to revise those estimates in several respects, and to provide a great deal of additional information regarding those estimates. Further, EPA has requested GE to provide “detailed cost build-up assumptions for all the combined alternatives” (i.e., each of the sediment and floodplain alternatives combined with each treatment/disposition alternative), and also to “discuss the uncertainties associated with these cost estimates” (Specific Comment 123).
- EPA also wants GE to develop and present tables showing the comparisons among remedial alternatives for numerous additional metrics. These metrics include PCB mass exported, reach average PCB concentrations, comparisons to ambient water quality criteria, time to reach the various Interim Media Protection Goals (IMPGs), and PCB mass removed/remaining – all of which are to be shown by subreach and for Connecticut (Specific Comment 13). In addition, EPA has requested such comparison tables for other metrics as well, including predicted reductions in PCB concentrations, worker health risk, habitat restoration benefits, habitat loss, etc. (Specific Comment 22).
- EPA noted a number of differences in inputs between the simulation modeling performed by GE in the CMS and a parallel modeling effort conducted by EPA, and it instructed GE to propose a resolution of those differences for EPA’s consideration prior to submittal of the CMS Supplement (Specific Comment 52). GE has submitted a separate memorandum to EPA on this subject on October 31, 2008, which it would like to discuss with the Agency. That memorandum provides a preliminary evaluation of the potential impact of these differences on the model results. As it explains, however, in order to fully evaluate and reconcile these differences in a definitive and quantitative way, it would be necessary to re-run nearly all of the CMS model simulations using the alternate inputs, compare them to the simulations in the CMS Report, and evaluate the results. If this is necessary, GE estimates that approximately 3 to 4 months would be required to complete such efforts, including 6 to 8 weeks to re-run the EPA model (given its long run times) and additional 6 to 8 weeks to process the results, generate the revised output graphics and metrics, evaluate the differences, and incorporate all results into the CMS Supplement.

Each of the tasks described above will, by itself, take substantial time to complete. The combination of these tasks, along with addressing EPA’s many other comments, will further increase the overall response time. GE has concluded that, even apart from evaluating a new remedial approach, a minimum of an additional 90 days is needed to complete the additional evaluations of the current CMS alternatives in response to

EPA's comments and to prepare a CMS Supplement presenting that information. Accordingly, at this time, GE suggests March 9, 2009 as a revised submittal date for the CMS Supplement. As noted above, during our discussions regarding new alternatives, we can discuss any further modifications to this schedule to allow the development and evaluation of such alternatives.

Please call me if you have any questions.

Very truly yours,



Andrew T. Silfer, P.E.
GE Project Coordinator

cc: James Owens, III, EPA
Richard Cavagnero, EPA
Dean Tagliaferro, EPA
Timothy Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA
Michael Gorski, MDEP
Susan Steenstrup, MDEP
Anna Symington, MDEP
Jane Rothchild, MDEP
Dale Young, MA EOEEA
Susan Peterson, CDEP
Tom Hill, GE
John Haggard, GE
Michael Carroll, GE
Roderic McLaren, GE
Kevin Mooney, GE
Stuart Messur, ARCADIS
Kevin Russell, QEA
James Bieke, Goodwin Procter
Samuel Gutter, Sidley Austin
Jeffrey Porter, Mintz, Levin
Public Information Repositories
GE Internal Repository