



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ONE CONGRESS STREET, SUITE 1100
BOSTON, MA 02114-2023

March 8, 2007

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 December, 2006 submittal titled
*Supplemental Soil Evaluation Report and Removal Design/Removal Action Work Plan
Addendum for Selected Phase 2 Floodplain Properties Adjacent to the 1 ½ Mile Reach of
the Housatonic River, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.*

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's December, 2006 submittal titled *Supplemental Soil Evaluation Report and Removal Design/Removal Action Work Plan Addendum for Selected Phase 2 Floodplain Properties Adjacent to the 1 ½ Mile Reach of the Housatonic River* (the "Report"). This 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 above-referenced Report, subject to the following conditions:

1. Based on an updated and more detailed topographic survey and other factors, EPA modified the boundary that was previously agreed upon by GE and EPA between the 1 ½ Mile Removal Action and GE's 1 ½ Mile Floodplain RAAs and that was utilized in GE's previous Removal Design/Removal Action (RD/RA) evaluations. The modified area is near the property lines for 18-4-6, 18-4-201, 18-4-202 and 18-4-7. The attached map dated 2-12-07 (revision D) and titled Floodplain RAA/1.5 Mile Reach Boundary depicts the revised boundary. GE shall revise the previous RD/RA evaluations for Parcels I8-4-6 and I8-4-201/202 using the boundary shown on the attached map.
2. For Parcels I8-4-201/202, GE shall remove and replace the top foot of soil in polygons 118, 119 and 120 and extend the polygons to the revised RAA boundary. The PCB levels for surficial soil associated with these polygons are 35 ppm, 50 ppm, and 244 ppm (0.5 to 1 foot) respectively.

3. GE shall consider expanding or adding soil removal areas to address certain other samples at these properties based on constructability and related factors. Specifically, GE shall consider removing and replacing soils associated with the following polygons:
 - a. At Parcels I8-4-201/202, the soils in polygon 39 down to 2.5 feet. The PCB level for soil associated with this polygon is 700 ppm.
 - b. At Parcels I8-4-2,3,4, the soils in polygons 18 and 45 down to 1.5 feet. The PCB levels for soil associated with these polygons are 30.4 and 53 ppm respectively.
 - c. At Parcel I8-4-7, the soils in polygons 24 and 32 down to 1.0 feet. The PCB levels for soil associated with these polygons are 76 and 50 ppm respectively.
 - d. At Parcel I8-4-7, the soils in polygon 24 down to 1.5 feet. The PCB level for soil associated with this polygon is 53 ppm.
 - e. At Parcel I8-4-7, the soils in polygon 7 down to 2.5 feet. The PCB level for soil associated with this polygon is 700 ppm.
4. GE shall include an inventory of the trees and shrubs located in the general work area in the Supplemental Information Package. GE shall replace any trees and shrubs damaged during the soil removal activities.
5. GE shall revise Section 6.3.1 to meet the requirements of Technical Attachment J to the SOW. Technical Attachment J requires GE to perform soil restoration inspection and maintenance activities at least every six months for the first year following response actions and annually thereafter (subject to subsequent EPA approval of a different frequency). Additional inspections of the soil restoration areas are required after severe storms. These requirements are in addition to the requirement to perform an inspection of the soil restoration area within one month after completion of final restoration activities and semi-annual inspections of the planted *vegetative material* for two years that is included in GE's Report.
6. GE shall revise the first sentence in section 6.3.2 as follows: "In connection with periodic inspections and inspections after severe storm events, GE will . . ." GE shall modify the remainder of Section 6.3.2 to be consistent with the revised first sentence.
7. GE shall propose a definitive schedule for the selection of a remediation contractor, the submission of a supplemental information package and the initiation of on-site remediation activities.
8. GE shall propose a schedule for the submission of a draft Final Completion Report for the 1 ½ Mile Floodplain Residential Properties and a draft Final Completion Report for the 1 ½ Mile Floodplain Non-Residential Properties. The due date for the draft reports shall be

triggered by the date at which on-site remediation and restoration activities (excluding post-removal site control activities) are completed.

GE shall submit a *Revised Supplemental Soil Evaluation Report and Removal Design/Removal Action Addendum, for Selected Phase 2 Properties Adjacent to the 1 ½ Mile Reach of Housatonic River* to address conditions in the letter within 21 days of the date of this letter.

EPA reserves its right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the CD.

If you have any questions, please contact me at (617) 918-1282.

Sincerely,



Dean Tagliaferro
EPA Project Manager

Attachment

cc:

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Rose Howell, EPA

Holly Inglis, EPA

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Anna Symington, MDEP

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Mayor James Ruberto, City of Pittsfield

Public Information Repository (Berkshire Athenaeum)

Rod McLaren, GE

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James Nuss, BBL

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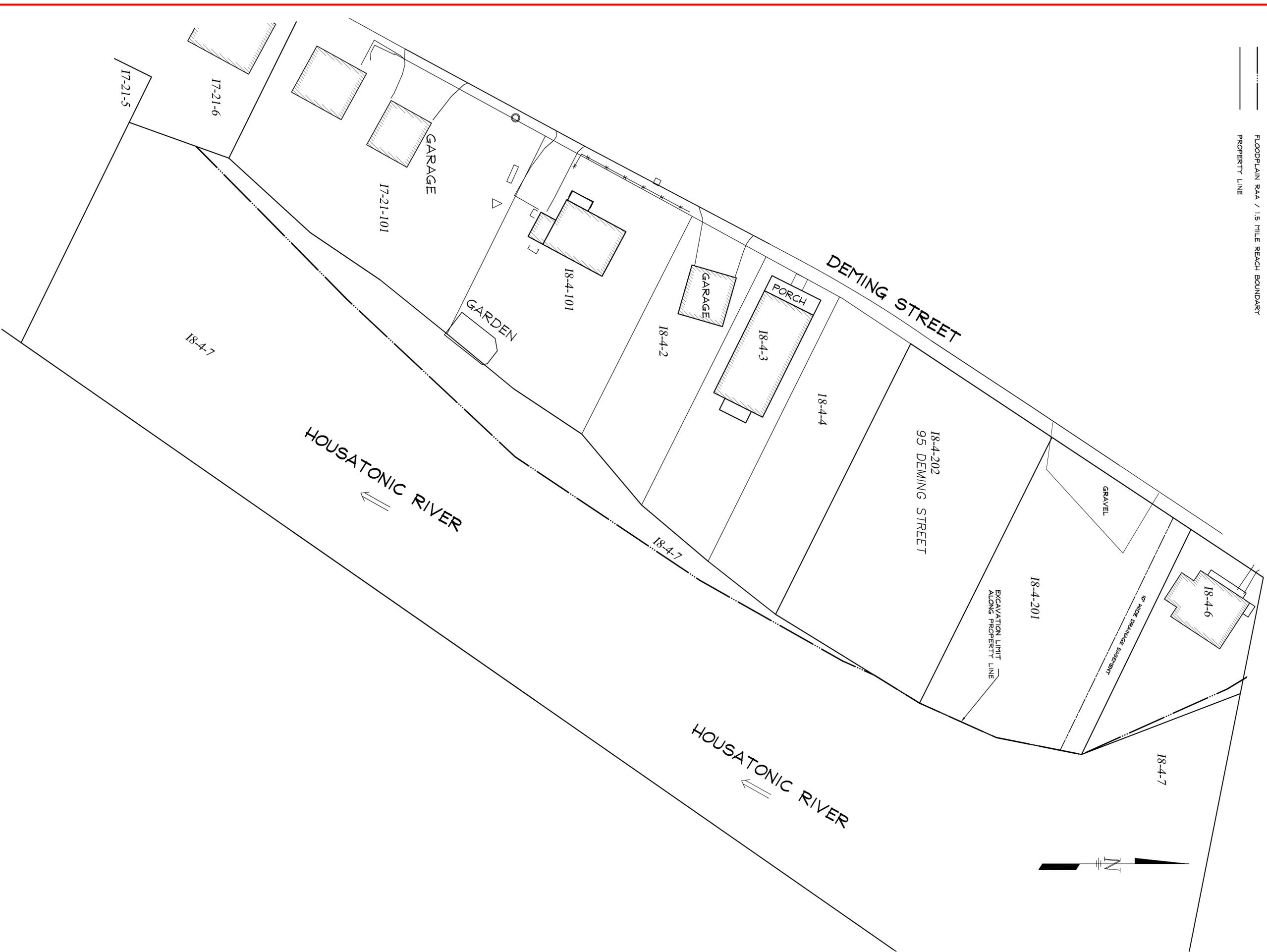
Linda Palmieri, Weston Solutions

Property Owner - Parcels I8-4-201 & 202

Property Owner - Parcels I8-4-2, 3, and 4

LEGEND

- FLOODPLAIN RAA / 1.5 MILE REACH BOUNDARY
- PROPERTY LINE



D	C-101	DRAWING NUMBER			
		REV.			
		PROJECT NUMBER: SRV-758-61			
		PROJECT NUMBER: SRV-758-61			
		GRAPHIC SCALE: 0 10 20			
		MATTER PLAN 1-15-07.DWG			
		CAD CODE:			
	DRAWN BY	DATE DRAWN	SCALE	APP'D. BY	
	JR	1-12-07	1" = 20'		
WESTON SOLUTIONS, INC.		EAST BRANCH HOUSATONIC RIVER, PHASE 2			
FROM ELM STREET BRIDGE,		PITTSFIELD, MA			
PROJECT DESCRIPTION		DRAWING TITLE			
EAST BRANCH HOUSATONIC RIVER		FLOODPLAIN RAA / 1.5 MILE REACH BOUNDARY			
REV.	DESCRIPTION	DRN/CK'D.	DATE		
A	ISSUED FOR COMMENT	JR	1-16-07		
B	ADDED ADJACENT PROPERTIES	JR	1-22-07		
C	ADDED BANK LIMITS	JR	1-23-07		
D	GENERAL REVISIONS	JR	2-12-07		
A COPY OF THE DATA IN THIS DRAWING FILE IS MAINTAINED AT THE OFFICES OF THE ARCHITECTS AND ENGINEERS AND IS THE SOLE RESPONSIBILITY OF THE USER.					
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