



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

May 26, 2005

Mr. Andrew Silber  
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 *Removal Design/ Removal Action Work Plan for the Group 3A and 3B Floodplain Properties*, GE- Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silber:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Removal Design/ Removal Action Work Plan for the Group 3A and 3B Floodplain Properties* dated April 2005 (Work Plan). The Work Plan 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 Work Plan subject to the conditions which are presented below.

1. EPA has reviewed the data set forth in the post-remediation tables in Volume II of the Work Plan. Although those data indicate that the PCB Performance Standards will be met, GE shall consider expanding the excavation limits shown on Technical Drawings 5 and 6 of the Work Plan based on constructability and related factors.
2. The derivation of a Method 2 Soil Standard for sulfide as described in Appendix E of the RD/RA Work Plan does not appear to have taken into consideration odor threshold and leaching potential to groundwater. GE shall provide an explanation as to why only direct contact was taken into consideration in deriving the standard.
3. Figure H-2 shows the proposed locations for air monitors for the remedial work on the Group 3B floodplain properties. The proposed locations 3B-2 and 3A-3 are located relatively close together. Without knowing the predominant wind direction at the Group 3B properties (the wind direction is not specified in Appendix H to the Work Plan), it

would appear that the locations of the monitors have not been selected to maximize coverage across this site and relative to the proposed work areas. Unless some of the site-specific factors listed at the bottom of page 2 of 6 preclude moving one or both of these monitors to different locations, GE shall consider moving monitor 3A-3 north so that it lies west of Parcel I7-3-8 or Parcel I7-3-9 and move monitor 3B-2 south, so that it located in the northern area of Parcel I7-3-5. In addition, GE shall clarify whether the labeling for monitor 3B-3 (located within the Group 3A properties) and monitor 3A-3 (located within the Group 3B properties) is accurate and intentional, or whether the labels for these monitors should be switched.

4. The PCB evaluations presented in the Work Plan do not appear to include all of the Weston START data. GE shall review Attachment 1, which includes the missing data, and provide an explanation as to whether inclusion of these data would change the outcome of the remedial evaluations.
5. The top of bank boundary within the Group 3A & 3B floodplain properties does not include EPA's 2004 non-bank removals. GE shall review the top-of-bank boundary taking account of those removals, and determine whether or not additional soil removal is required to meet the Performance Standards specified in the Consent Decree.

GE shall submit an Addendum to the Work Plan that addresses the comments above within two weeks from the date of this letter. This Addendum shall include revised excavation limit figures based on the additional removals proposed by GE in response to the above comments.

If there is any conflict between the Performance Standards as described in the Work Plan and as set forth in the Consent Decree and/or Statement of Work for Removal Actions Outside the River (Appendix E to the Consent Decree), the Consent Decree and Statement of Work shall control. EPA reserves its right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (617) 918-1240.

Sincerely,



William Lovely  
GE Facility Project Manager

cc.

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