



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

November 25, 2008

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 July 30, 2008 submittal titled Plant Site 1 Groundwater Management Area, *Groundwater Quality Monitoring Interim Report for Spring 2008*, GE-Pittsfield/Housatonic River Site

Dear Mr. Gates:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Groundwater Quality Monitoring Interim Report for Spring 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 Fall 2008 groundwater monitoring described therein, subject to the following conditions.

1. During all future monitoring events, GE shall use best efforts to measure groundwater elevations within a three-day period. Also, at the time of the collection of groundwater samples, GE shall note the groundwater elevation for each well and the flow in the Housatonic River as measured at Coltsville, and include this information in subsequent groundwater reports under the Decree.
2. In addition to re-developing well ESA1N-52, GE shall re-survey and confirm the construction details since the well details given in the groundwater sampling logs from Spring 2008 and Fall 2007 are discrepant. GE shall also inspect the well covers, surface grade in the vicinity of the well, and overall condition of the well and conduct maintenance as necessary in order to inhibit inflow to the well and otherwise ensure the well's viability and functionality. Also, it appears that deposition, or other obstruction, has been measurable in this well since 2003. Since this deposition, or other obstruction, may be an indicator of surface water inflow to the well, the quality of the monitoring data for this well since 2003 may be questionable. GE shall discuss the potential impact on this well's data quality in the next monitoring report, and GE shall consider this potential impact when making decisions for the long-term monitoring program. In this evaluation

of past data, GE shall also include a discussion on the discrepant well details given in past reports and the potential impact on data quality.

3. GE shall re-develop well ES2-2A and shall inspect the well covers and surface grade in the vicinity of the well and conduct maintenance as necessary in order to inhibit inflow to the well.

4. GE discusses the retention of well ESA2S-52 in the monitoring program. For future discussions regarding monitoring program determinations for a given well, GE shall include bar charts illustrating historical concentrations of the primary constituents being evaluated.

5. GE shall sample and/or demonstrate compliance for PCBs with GW-2 criteria at the following wells: ES2-19; GMA1-3; 95-25; ESA1N-17A; 95-20; A7; ES1-10; ES1-18; F-1; LSSC-16S; MW-3/3R; MM-1; ESA1S-37R, GMA1-4; GMA1-25; GMA1-27; 31R; 72R; and GMA1-6.

GE shall note that groundwater/LNAPL monitoring/sampling data from GMA1-6 may not, by itself, be considered sufficient to demonstrate compliance with the GW-2 standard within the building immediately to the north and upgradient of the well. Per MDEP guidance, groundwater/LNAPL monitoring/sampling data from a point likely to have the highest contaminant concentrations is necessary to demonstrate compliance with the GW-2 standards at the building. The LNAPL monitoring data from the wells immediately to the north (upgradient) of the building indicate that GW-2 compliance is not demonstrated by virtue of their containing LNAPL within such proximity to the building. A well downgradient of the building is not, by itself, sufficient to demonstrate GW-2 compliance in view of this upgradient LNAPL monitoring data and is for use in demonstrating GW-2 compliance for buildings further downgradient from the plume and this subject building.

6. In the next groundwater quality monitoring interim report, GE shall provide an updated figure (similar to Figure 11 of the September 2000 Baseline Monitoring Program Proposal for Plant Site 1 Groundwater Management Area) illustrating areas within GMA 1 where the average depth to groundwater is within 15 feet of the ground surface, utilizing groundwater elevation data collected between 2000 and 2008.

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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