



**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 January 31, 2009 submittal titled Plant Site 1 Groundwater Management Area, *Groundwater Quality Monitoring Interim 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 *Groundwater Quality Monitoring Interim 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. Table 1 shows monitoring well 95-20 in both East St. Area 2 – South and in East St. Area 2-North. The well is located in East St. Area 2- North only, and the tables in future reports shall be corrected accordingly.
2. GE states that Appendix A includes a summary of the results of a well inspection and maintenance program initiated in the fall of 2008 inventory of 128 wells in this GMA. The results from this inspection and maintenance program are not included in Appendix A. GE shall include these results in the next groundwater monitoring report for GMA-1.
3. GE attributes the elevated pH recorded at replacement well A-7R to impacts from the well's recent construction and predicts that the pH will return to more typical levels with increased groundwater flow through the well over time. If the pH monitoring results during the Spring 2009 sampling event return to "normal" levels, GE shall conclude that the pH result for Fall 2008 is anomalous due to the recent well construction and therefore not representative of groundwater conditions and the well data for the Fall 2008 sampling period shall be rejected. If the pH monitoring results during the Spring 2009 sampling event remain at elevated levels, then GE shall conduct further investigation to determine the well's efficacy, or the reason for elevated pH conditions in the groundwater at this location.

4. In Section 2.6, GE states that the fall 2008 sampling round was performed from October 15 to December 11. The sampling logs indicate that the round, excepting the newly installed well A7-R, was conducted in a 15-day period. In future reports, GE shall provide an explanation in the report text for seemingly extended sampling round durations (e.g. greater than 21 days for this GMA), especially when the stream flow in the Housatonic River varies as significantly during the sampling period as reported in Section 2.5. The potential relationship between such stream flow variability throughout the monitoring period and the monitoring data shall be discussed in future reports.

5. In Section 2.6, GE gives the stabilized readings for groundwater parameters measured during the Fall 2008 sampling round. In future reports, GE shall discuss measurements that are outside the range of normal groundwater readings as is the case for the temperature range given in this Report.

In Section 2.6, GE also states that no turbidity was recorded in Table 4 for well ES2-19. The sampling log shows that turbidity was recorded at this well in excess of the instrument's range. Recordings beyond an instrument's range shall be given as a data point in data tables such as Table 4, with explanations provided in narratives such as was done in Section 2.6 of this report.

6. Since well ESA1N-52 has not been successfully developed and/or repaired since an obstruction was observed and significant accumulations of sediment still remain in the well, EPA agrees that the data from Spring 2004 to the present is not sufficiently reliable to be used except for groundwater elevations and NAPL observations as stated in the Report (providing the well screen satisfactorily intersects the water table for such measurements). Therefore, in future GMA-1 determinations and trend analyses, the data for this well from Spring 2004 to the present shall not be referred to, or incorporated in such determinations and trend analyses. If the data from prior to Spring 2004 is not sufficient to establish that the performance standards as revised in February 2008, have been met for well ESA1N-52, then GE shall install a replacement well.

EPA requested in the Conditional Approval Letter for GE's Spring 2008 GMA-1 Groundwater Monitoring Report that GE provide bar charts to illustrate historical concentrations for discussions on monitoring program determinations for individual wells. Bar charts for well ESA1N-52 were not included in the Report, despite GE's proposal to remove this well from the interim groundwater monitoring program. GE shall include bar charts to show the historical data sets for this well in the next report in order to illustrate the compliance status of this well based on pre-Spring 2004 data, and for any other well in any future report where the compliance status of a given well is discussed.

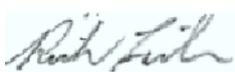
7. For future groundwater monitoring events, GE shall include a note on field sheets describing conditions that may influence the integrity of each well, including security, missing covers, submersion in puddles, measured sedimentation, evidence of inflow, etc. Issues regarding well integrity and security shall be noted in all future groundwater reports.

8. EPA requests that GE provide detection limits in Tables 5, 6, and 7, or their equivalent in future reports where PCBs are not detected.

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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