



**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 February 27, 2009 submittal titled
Groundwater Management Area 3, *Groundwater Quality and NAPL 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 and NAPL 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. In the next report, GE shall include a summary table of the results of the well inspection and maintenance program initiated in the fall of 2008 of the 54 wells in this GMA. Such summary tables shall be included in all subsequent reports for inspection and maintenance activities for the subject monitoring period.

In the Conditional Approval Letter (CAL) for the Spring 2008 monitoring report, EPA required GE to conduct mitigation measures as necessary to address sediment buildup in several wells. GE shall include inspection observations that identify potential issues with the wells that have resulted in deposition, and the measures taken to mitigate this deposition. Since well 51-7 was unintentionally omitted from the inspection and maintenance activities of the past monitoring period, this well shall be addressed prior to the next monitoring round.

2. The number of groundwater elevation monitoring points coupled with the low groundwater gradient warrants increased resolution in future contour maps. GE shall increase the resolution of the contours in future groundwater elevation contour maps to 1-ft contours.

3. 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.

4. For the sampling logs at wells GMA3-2, GMA3-8, and 16B-R, GE has recorded a drawdown in excess of the 0.3 foot displacement goal established in GE's Field Sampling Plan. In addition, since the groundwater level decreased to a point below the top of the bladder pump in well GMA3-8 such that depth to water readings could not be collected, it is uncertain whether the water level was continuing to decrease, had stabilized, or was increasing back toward static levels. Although all field parameter readings were within the criteria to define stabilization, GE could have conducted additional activities to further verify that the well was not being placed under stress at the time of sampling such as:

- reducing the pump rate to the minimum rate as soon as excessive drawdown was observed;
- lowering the pump intake to allow depth to groundwater measurements to be collected for a greater period of time and possibly to a stabilized level; and
- continued purging until turbidity data showed a fluctuation between increasing and decreasing values indicative of stabilization or the well was purged dry.

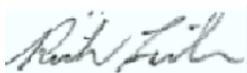
For future sampling activities, GE shall make every effort to adhere to the guidelines and requirements in the Field Sampling Plan. For situations where there is a deviation from the Field Sampling Plan, GE shall note this and evaluate potential reasons and potential impacts on field and analytical data.

5. In future reports, GE shall show the contemporaneous extent of NAPL in future depictions of sub-slab soil gas and indoor air sampling locations, such as Figure E-1 in this Report.

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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