



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

January 27, 2009

Mr. Richard W. Gates, Remediation Project Manager
Corporate Environmental Programs
General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: EPA Conditional Approval of General Electric's August 29, 2008, submittal titled *Groundwater Management Area 4 (GECD340) Groundwater Quality Monitoring Interim Report for Spring 2008*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's August 29, 2008, submittal titled *Groundwater Management Area 4 (GECD340) Groundwater Quality Monitoring Interim Report for Spring 2008* (the "Report"). This letter 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, subject to the following conditions:

1. During all future monitoring events, GE shall use best efforts to measure groundwater elevations within a two-day period. Also, at the time of the collection of groundwater samples, GE shall note the groundwater elevation in the well being sampled and the river stage of the East Branch of the Housatonic River measured at Coltsville, and include this information in the groundwater reports.
2. In all future groundwater monitoring reports, where GE makes reference to the MCP GW-2 compliance standard for PCBs, revised by MDEP in February 2008, GE shall indicate that when analyzing samples to evaluate State groundwater standards, MDEP has informed EPA that the use of filtered samples is appropriate. In the Report, GE, with the concurrence of EPA, used PCB results from the analysis of filtered samples for comparison to the new GW-2 standard.
3. Note that EPA will require GE to treat the OPCA monitoring wells differently than other wells for purposes of long-term groundwater monitoring. In its response to GE's August 15,

2008 submittal, "Hill 78 and Building 71 On-Plant Consolidation Areas Post-Removal Site Control Plan ("OPCA PRSCP"), EPA will provide specific conditions on the OPCA post-closure monitoring program, including the OPCA monitoring wells. Upon receipt of such conditions, GE shall address the conditions as required in EPA's response to the OPCA PRSCP. If GE uses an OPCA monitoring well to satisfy requirements related to GMA 4, GE shall include such requirements (that is, GMA-related requirements) in subsequent GMA submittals.

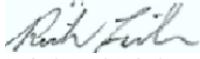
4. In order to determine the direction and extent of migration of VOCs beyond the boundary of GMA-4 in the area south of wells H78B-16 and H78B-17R, and to assess the potential migration of constituents deeper in the water column, GE shall provide a proposal for the installation of an additional monitoring well couplet. EPA recommends that the proposal for the installation of this monitoring well couplet locates the wells in the vicinity of the intersection of East Street and Commercial Street, between wells OJ-MW-1 (at GMA-2) and GMA4-5. The couplet shall include a shallow well screened to intersect the top of the water table and a deeper well with a screened interval that reaches the till interface (if encountered) or screened at a depth 10-20 feet below the top of the water table, if the till is greater than 20' below the water table. The well couplet location and screened interval depths shall be subject to approval by EPA's field representative following utility clearance and prior to the initiation of drilling. If the till interface is sufficiently shallow such that a single well screened from the top of the groundwater table to the top of the till interface can be utilized, GE may install a single well subject to approval by EPA's field representative.

To determine the extent and migration of VOCs beyond the GMA-4 boundary, GE's proposal shall include a schedule for monitoring the newly installed well couplet, as well as wells OJ-MW-1 and GMA4-5 (at the Commercial Street Site), for groundwater elevation and VOCs at no less a frequency than the monitoring conducted at GMA 4 as part of its interim monitoring program. The proposal shall be included with GE's groundwater monitoring report for the fall 2008 monitoring period. Access for the proposed location of the couplet shall be verified in the forthcoming report. Descriptions of the sampling activities and results, along with assessments of the data and any proposals to modify the groundwater sampling activities in this area, including additional groundwater characterization in this area, shall be included in subsequent groundwater monitoring reports.

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 Richard Fisher at (617) 918-1721.

Sincerely,



Richard Fisher
Project Manager

cc:

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