



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

October 22, 2007

Mr. Richard Gates, Remediation Project Manager  
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 October 5, 2007, submittal titled *Addendum to Supplemental Sampling and Engineering Design Report for Re-routing of Sanitary and Storm Sewer Pipelines*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Gates:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of GE's October 5, 2007, submittal titled *Addendum to Supplemental Sampling and Engineering Design Report for Re-routing of Sanitary and Storm Sewer Pipelines* (the "Addendum"). 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, in consultation with the Massachusetts Department of Environmental Protection, approves the Addendum, subject to the following conditions:

1. The plan for tree restoration and replacement activities being prepared as required by condition #5 of EPA's June 19, 2007 conditional approval letter for GE's April 13, 2007 submittal titled *Hill 78 On-Plant Consolidation Area Phase III Final Cover Installation Activities*, which will now incorporate the plans for tree restoration and replacement associated with the rerouting of the sewers, was to be submitted within 30 days following the completion of the 2007 Hill 78 OPCA phase III final cover and closure activities. GE shall now submit the plan within 30 days of the completion of the remaining phase III final cover and closure activities and implement that plan as soon as practicable following completion of those activities. Also, the trees that will be removed as part of the re-routing project are not exclusively spruce trees, as indicated in GE's response to EPA comment No. 4 on page 4 of the Addendum.
2. GE's proposal contained in response to comment #6 for establishing the 50-foot wide utility band associated with the utility corridor as its own polygon (for PCBs only) is appropriate for the portion of the utility corridor for which soils are excavated and replaced. For the section of the utility corridor that is constructed above ground (the

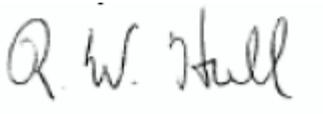
“daylighting” section of the storm sewer pipeline), the polygons for the Hill 78 Area-Remainder RAA shall be evaluated based on the conditions as they exist prior to the proposed work in this area.

3. Although EPA approves GE’s proposal not to segregate and replace utility corridor soils by depth increment, GE shall include all samples collected within the top 15 feet of the utility corridor in the Appendix IX+3 evaluation that will be included in the forthcoming Conceptual RD/RA Work Plan for the Hill 78 Area-Remainder RAA.
4. EPA reserves its right to require additional soil removal for Appendix IX+3 compounds outside the area excavated and replaced for the pipeline trench following its review of the Hill 78 Area-Remainder Conceptual RD/RA Work Plan.

EPA reserves all of its rights under the CD, including but not limited to, the right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the CD.

If you have any questions, please contact me at (617) 918-1882.

Sincerely,



Richard W. Hull  
GE Facility Project Manager

cc:

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