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February 25, 2009

Mr. Ira W. Leighton
Acting Regional Administrator
United States Environmental Protection Agency
Region 1
1 Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Re: GE-Pittsfield/Housatonic River Site
Corrective Measures Study

Dear Mr. Leighton:

Thank you for your February 5th response to my January 16th letter. I am pleased that EPA agrees that the Ecologically Sensitive Alternative (ESA) should be developed and considered on an equal footing with all of the previously identified remedial alternatives in a revised Corrective Measures Study (CMS) Report.

In the meantime, as you requested in your February 5th letter, GE will provide a response to EPA's comments on the CMS on March 9, 2009. The response will reflect thousands of hours of effort by GE and its consultants since we received those comments. It will be a voluminous response that could total as many as 1000 pages of text and supporting materials, and will address the great majority of EPA's comments.

As you know, in GE's November 5th letter from Andy Silfer to Susan Svirsky, we stated that in order to properly address the issues raised, GE required a minimum of 180 days (*i.e.*, to March 9, 2009) to respond to the interim comments and that we would be prepared to further discuss schedule modifications at an upcoming meeting with EPA and the Commonwealth of Massachusetts. We subsequently stated that we would need an additional four months from the date of EPA approval of a work plan for the ESA to complete the analysis of the ESA.

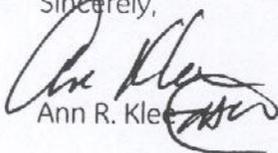
We discussed this timeframe with EPA and the Commonwealth at the meeting that took place on December 19th in Boston. At that time, we gave EPA an update regarding the status of GE's effort to respond to EPA's comments and also emphasized our view that the ESA was integral to a complete response to EPA's comments and should be incorporated in a CMS Supplement. The Commonwealth

agreed with that approach. We reiterated that incorporating this information would require additional time and effort, and further indicated that we could provide an ESA work plan in approximately 30 days and a comprehensive CMS Supplement four months thereafter. We suggested that a follow up meeting of the technical staff from GE, EPA and the Commonwealth would facilitate more specific discussion of the ESA and advance our shared goal of completing the CMS as expeditiously as possible. Regional Administrator Varney expressed support for the technical meeting and then suggested that further discussion of the CMS schedule be deferred to that meeting. Unfortunately, there were delays in scheduling this meeting; however, it is now scheduled to take place on March 12th in Pittsfield.

In the meantime, we have been diligently proceeding with our work. Accordingly, we are still able to meet our commitment to provide EPA with an interim response on March 9. That submission will not include responses to some comments or portions of comments that would be affected by the further definition of remedial alternatives, including the ESA, or that require additional time to complete. Those remaining responses will be provided, along with GE's evaluation of the ESA and any revisions to our interim responses in light of that evaluation, in the revised CMS Report referenced in your letter. This approach is consistent with our RCRA permit, which provides that deadlines for additional submittals may be established only upon EPA's approval or disapproval of the CMS Report, which has not occurred to date.

Thank you again for your letter of February 5th and your attention to this matter. I am pleased to hear that our staffs have arranged a meeting to discuss the development and analysis of the ESA. We look forward to continuing to work with EPA, the Commonwealth, and other stakeholders toward the completion of a revised CMS Report.

Sincerely,



Ann R. Klee

cc: James T. Owens, III, EPA
Richard Cavagnero, EPA
Robert Cianciarulo, EPA
Timothy Conway, EPA
Susan Svirsky, EPA
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