



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



SDMS DocID 000232754

June 16, 2005

Mr. Andrew Silfer
Corporate Environmental Programs
General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Approval of General Electric's *Addendum to Removal Design/ Removal Action Work Plan for the Group 3A & 3B Floodplain Properties* GE- Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Addendum to Removal Design/ Removal Action Work Plan for the Group 3A & 3B Floodplain Properties* dated June 8, 2005 (Addendum). The Addendum 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 above-referenced submittal subject to the following conditions which are presented below.

1. Attachment B of the Addendum presents GE's response to EPA's comment regarding the derivation of a standard for sulfide that considers odor threshold and leaching potential to groundwater. For future submittals, GE shall evaluate surrogates other than carbon disulfide to address odor threshold and leachability issues since this compound does not have sufficient information to derive a leaching based standard, and a derived odor index for carbon disulfide is not relevant.
2. EPA has reviewed the revised excavation limits shown on Figures 5 and Figure 6. GE shall consider further expansions of the excavation limits shown on Figure 6 based on constructability and related factors in the vicinity of the 1-foot removal located along the property line between parcels I7-3-10 and I7-3-9.

If there is any conflict between the Performance Standards as described in the Addendum and as set forth in the Consent Decree and/or Statement of Work for Removal Actions Outside the River

(Appendix E to the Consent Decree), the Consent Decree and Statement of Work shall control. EPA reserves its right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (617) 918-1240.

Sincerely,



William Lovely
GE Facility Project Manager

cc.

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