



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Courier

May 22, 2006

Ms. Sharon M. Hayes
U.S. Environmental Protection Agency
EPA - New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Re: **GE-Pittsfield/Housatonic River Site
Groundwater Management Area 1 (GEC310)
Proposal to Remove/Replace Monitoring Wells – 20s and 30s Complexes**

Dear Ms. Hayes:

The Pittsfield Economic Development Authority (PEDA) has identified certain Groundwater Management Area 1 (GMA 1) monitoring wells located within the 20s and 30s Complexes that would be impacted by their development plans for those areas. Those wells are identified on the attached Figure C-104. As seen on that figure, PEDA proposes to request GE to protect most of the existing monitoring wells. For those wells, GE (on behalf of PEDA) will either extend or cut the monitoring well casings to the level of the proposed grade in the area. However, that solution is insufficient for five monitoring wells (i.e., 20s Complex well O-R and 30s Complex wells 95-15, GMA1-2, GMA1-10, and RF-16) and, to facilitate PEDA's development of the Premises, PEDA has requested that the wells be removed and, where necessary, replacement wells be installed. Those wells are discussed in detail below, along with GE's recommendations on the need to install replacement wells or, alternatively, to remove the wells without replacement. Following EPA approval of the proposals contained herein, PEDA and GE will initiate plans to have GE (on behalf of PEDA) remove the selected monitoring wells and install the approved replacement wells as soon as drilling activities can be coordinated with their other development activities.

Well O-R

This well is located in the 20s Complex and is utilized to monitor the extent of light non-aqueous phase liquid (LNAPL) in this area. It is currently monitored on a semi-annual basis as part of GE's NAPL monitoring program. PEDA has proposed that well O-R be removed and a new well be installed approximately 60 feet to the north of the current well location.

GE RECOMMENDATION: Well O-R should be removed and a replacement well (to be designated as well O-RR) should be installed at the location proposed by PEDA.

Well 95-15

This well is located in the 30s Complex and is not included in the GMA 1 monitoring program. However, it is currently monitored on a monthly basis to provide data to support RD/RA activities at nearby Silver Lake. NAPL has never been observed at this monitoring well. PEDA has proposed that well 95-15 be removed and a new well be installed approximately 30 feet to the southwest of the current well location.

GE RECOMMENDATION: Well 95-15 should be removed and not replaced. A replacement well is not needed at this location as groundwater elevation data in this area are available from nearby wells GMA1-12 and RF-16 (which is proposed to be replaced below).

Well GMA1-2

This well is located in the 30s Complex and is not currently included in the GMA 1 monitoring program. However, it was formerly sampled as a GW-2 monitoring point during the GMA 1 baseline monitoring program. In the January 2005 *Plant Site 1 Groundwater Management Area Groundwater Quality Monitoring Interim Report for Fall 2004* (Fall 2004 GMA 1 Groundwater Quality Report), GE proposed to discontinue sampling activities at this location as the MCP GW-2 standards are not applicable due to the greater than 15 foot depth to groundwater and the fact that the analytical data collected from well GMA1-2 do not indicate a need for continued monitoring. That proposal was approved by EPA in a letter dated May 31, 2005. NAPL has never been observed at this monitoring well. PEDDA has proposed that well GMA1-2 be removed and a new well be installed approximately 100 feet to the northwest of the current well location.

GE RECOMMENDATION: Well GMA1-2 should be removed and not replaced. A replacement well is not needed at this location since the GW-2 monitoring criteria do not apply at this location and groundwater elevation data in this area are available from nearby well 95-16.

Well GMA1-10

This well is located in the 30s Complex and is included in the GMA 1 NAPL monitoring program as a semi-annual NAPL monitoring point. In addition, it is currently monitored on a monthly basis to provide data to support RD/RA activities at nearby Silver Lake. This well was installed to assess the potential presence of NAPL observed in a soil sample collected from a boring installed in December 2000 during the pre-design investigation at this RAA. In response to this observation, GE, with EPA concurrence, installed a monitoring well (GMA1-10) at this location and has routinely monitored the well for the presence of NAPL on a weekly basis since its installation in June 2001. NAPL has never been observed at this monitoring well. PEDDA has proposed that well GMA1-10 be removed and a new well be installed approximately 30 feet to the southwest of the current well location.

GE RECOMMENDATION: Well GMA1-10 should be removed and not replaced. A replacement well is not needed at this location as no NAPL has been observed in the well over almost five years of routine monitoring activities. Groundwater elevation data in this area are available from nearby wells RF-2 and RF-3.

Well RF-16

This well is located in the 30s Complex and is currently included in the GMA 1 interim groundwater quality monitoring program. NAPL has never been observed at this monitoring well. PEDDA has proposed that well RF-16 be removed and a new well be installed approximately 50 feet to the southwest of the current well location.

GE RECOMMENDATION: Well RF-16 should be removed and a replacement well (to be designated as well RF-16R) should be installed at the location proposed by PEDDA.

If EPA agrees that these wells should be removed and/or replaced as proposed by GE, we ask you to please provide verbal approval during the next (or subsequent) Monday morning conference calls. If EPA does not wish to approve any of these proposals, or wants to modify them in some way, any such comments can be addressed under the established system (i.e., draft letter circulation/margin comments/final conditional approval letter), or discussed further during a technical conference call.

If you have any questions, please contact me at (413) 448-5905 or via e-mail at: John.Novotny@corporate.ge.com, or call Nick Smith of BBL at (315) 671-9238 or contact him via e-mail at ns@bbl-inc.com.

Sincerely,



John F. Novotny, P.E.
Manager - Facilities and Brownfields Programs

Enclosure

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