



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Electronic Mail/Overnight Delivery

October 20, 2006

Mr. Dean Tagliaferro
United States Environmental Protection Agency
c/o Weston Solutions, Inc.
10 Lyman Street
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
Hill 78 On-Plant Consolidation Area (GECD210)
Re-routing of Sanitary and Storm Water Pipelines**

Dear Mr. Tagliaferro:

As you know, last year the General Electric Company (GE) identified a partial blockage in the 48-inch-diameter storm sewer line located below the Hill 78 On-Plant Consolidation Area (OPCA). Following the performance of additional investigation activities to further delineate the partial blockage, as well as some conceptual discussions with EPA and the City of Pittsfield (City), GE has developed a plan to address the partial blockage. This letter presents the proposed plan, subject to receipt of all necessary approvals by the City, including modifications to both the storm and sanitary sewer pipelines beneath the Hill 78 OPCA. Specifically, the pipeline modification activities will include relocating the portions of the sanitary and storm sewer pipelines that are currently under the Hill 78 OPCA to new locations outside of the western limits of the Hill 78 OPCA, and grouting of the existing pipelines under the OPCA. The relocation activities are discussed in the remainder of this letter. Once this plan to relocate the existing pipelines is approved by the U.S. Environmental Protection Agency (EPA) and necessary approvals have been obtained from the City, a formal engineering design will be prepared for review by EPA and, as appropriate, the City, and subsequent contractor bidding and selection.

RELOCATION OF PIPELINES

The new sanitary sewer pipe is proposed to consist of 10-inch-diameter standard dimension ratio (SDR) 35 polyvinyl chloride (PVC) and be installed from a new concrete manhole located along Tyler Street Extension (northwest of the Hill 78 OPCA), extending around the western perimeter of the Hill 78 OPCA, and leading to a reconnection point at the existing manhole upstream (North) of Merrill Road. The new sanitary sewer will comprise approximately 1,000 linear feet of new PVC pipe set at an average slope of 0.46 percent with five new pre-cast concrete manholes set along the route. In addition, based on current site conditions, modification or replacement of the existing manhole upstream of Merrill Road may also be necessary. The depth of the proposed pipe will vary from 15 to 25 feet below grade. The approximate location of the new 10-inch-diameter sanitary sewer is shown on Figure 1.

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The new storm sewer pipe is proposed to be installed from the existing on-site manhole located northwest of the Hill 78 OPCA, extending around the western perimeter of the Hill 78 OPCA, and "daylighting" immediately upstream (North) of the culvert under Merrill Road. The new storm sewer will consist of approximately 1,250 linear feet of new 48-inch-diameter corrugated, smooth wall interior high-density polyethylene (HDPE) pipe set at an average slope of 0.55 percent with four pre-cast concrete manholes set along the route. Modifications to the existing manhole located northwest of the Hill 78 OPCA will also be required. The depth of the proposed pipe will vary from two feet (in the existing drainage valley north of Merrill Road) to 25 feet below grade. To provide at least two feet of soil cover over the pipe, regrading and filling of a portion of the existing valley will be necessary. The approximate location of the new 48-inch-diameter storm sewer is shown on Figure 1.

Based on a preliminary evaluation of the available PCB data for the existing soils in the vicinity of the locations proposed for the new pipelines, it is anticipated that most of the excavated soils can be reused as backfill. However, a detailed evaluation of the PCB concentrations in the soils will be conducted during the engineering design activities (including additional sampling, if necessary) to confirm that the soils can be reused. This evaluation will be included with the final design submitted to the EPA for its review and approval.

GROUTING EXISTING PIPELINES

Once the new pipes have been installed, the portions of the existing sanitary and storm sewer pipelines that were bypassed by the installation of the new lines will be taken out of service. The pipelines will be blocked at each end and grouted with flowable fill (e.g., a mixture of fly ash and weak concrete).

GE anticipates that, upon relocation of the pipelines, appropriate modifications will be made to City easements to reflect the new locations of the pipelines.

We trust that this letter sufficiently documents the proposed modifications to the existing sanitary and storm sewer pipelines currently located beneath the Hill 78 OPCA, and we request EPA approval of this plan. Once approved, and subject to receipt of all necessary approvals by the City, we anticipate that the engineering design and contractor procurement activities can be completed in the remainder of 2006 and pipe installation can be initiated in Spring 2007. If you have any comments or questions, please feel free to contact me.

Sincerely,



Paul Richards Gates

Richard Gates
Remediation Project Manager

Attachment

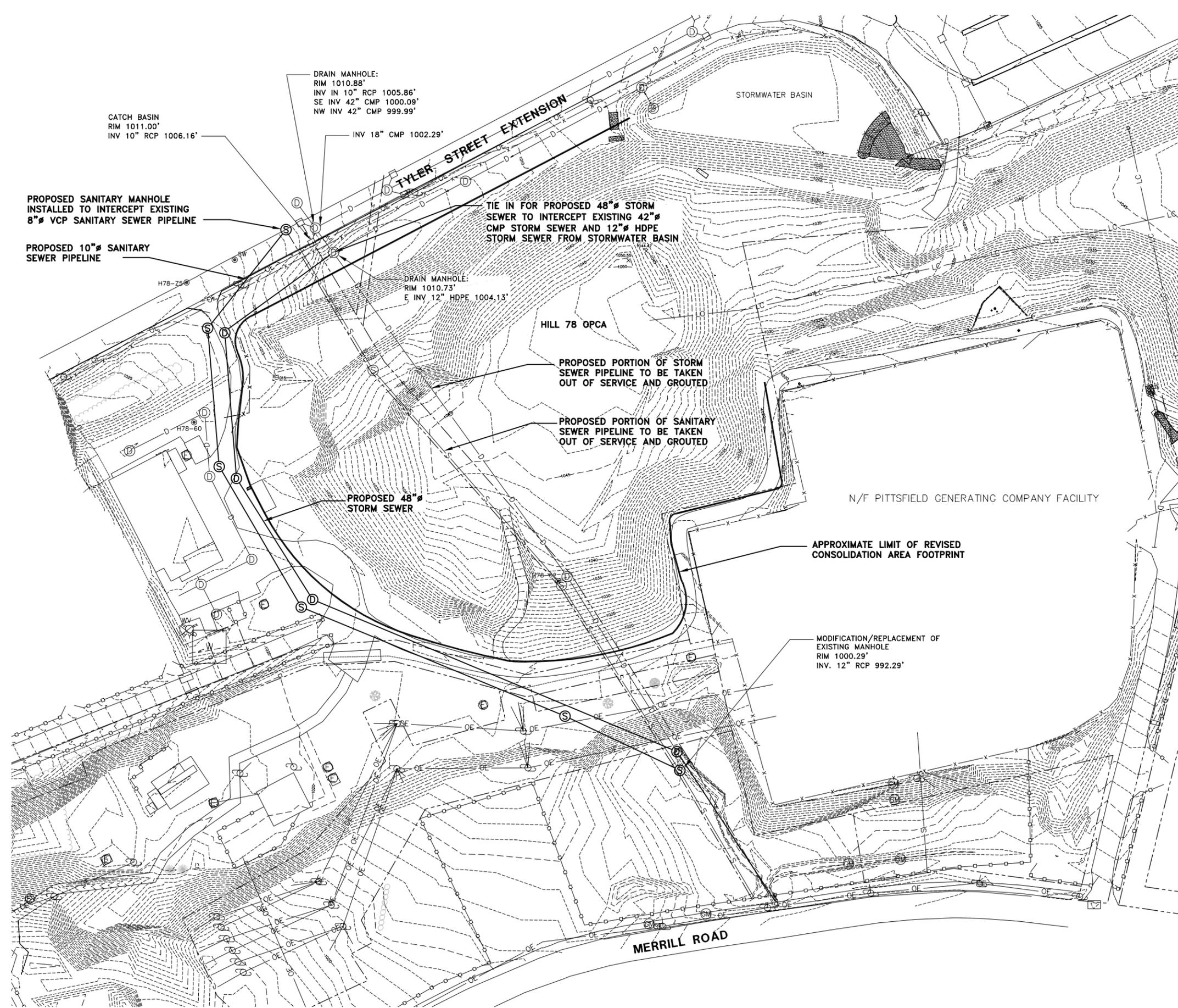
cc: Tim Conway, EPA
John Kilborn, EPA
Holly Inglis, EPA
Rose Howell, EPA*
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
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Teresa Bowers, Gradient
Michael Carroll, GE*
Andrew Silfer, GE
Roderic McLaren, GE*
James Nuss, BBL
James Bieke, Goodwin Procter
Laurence Kirsch, Goodwin Procter
Public Information Repositories
GE Internal Repository

**cover letter only*

Figure

SYR-85-KMD GMS LAF LAYER: ON=*, OFF=REF
 G:\ACTIVE\20404001\CONSOL_20404001.DWG SAVED:10/19/2006 9:18 AM LAYOUT:1 PAGESETUP:----- PENTABLE.PLT, FULLCTB PRINTED:10/19/2006 9:51 AM BY:KDAVIS
 PROJECT NAME: 20404X01
 XREFS: IMAGES: 20404X01



CATCH BASIN
 RIM 1011.00'
 INV 10" RCP 1006.16'

 DRAIN MANHOLE:
 RIM 1010.88'
 INV IN 10" RCP 1005.86'
 SE INV 42" CMP 1000.09'
 NW INV 42" CMP 999.99'

 INV 18" CMP 1002.29'

 PROPOSED SANITARY MANHOLE
 INSTALLED TO INTERCEPT EXISTING
 8" VCP SANITARY SEWER PIPELINE

 PROPOSED 10" SANITARY
 SEWER PIPELINE

TIE IN FOR PROPOSED 48" STORM
 SEWER TO INTERCEPT EXISTING 42" CMP
 STORM SEWER AND 12" HDPE
 STORM SEWER FROM STORMWATER BASIN

DRAIN MANHOLE:
 RIM 1010.73'
 E INV 12" HDPE 1004.13'

PROPOSED PORTION OF STORM
 SEWER PIPELINE TO BE TAKEN
 OUT OF SERVICE AND GROUTED

 PROPOSED PORTION OF SANITARY
 SEWER PIPELINE TO BE TAKEN
 OUT OF SERVICE AND GROUTED

PROPOSED 48"
 STORM SEWER

APPROXIMATE LIMIT OF REVISED
 CONSOLIDATION AREA FOOTPRINT

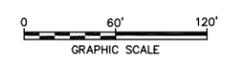
MODIFICATION/REPLACEMENT OF
 EXISTING MANHOLE
 RIM 1000.29'
 INV. 12" RCP 992.29'

LEGEND:

- SURVEY BENCHMARK
- GAS MARKER
- GUY ANCHOR
- SANITARY MANHOLE
- CATCH BASIN
- DRAIN MANHOLE
- WATER METER PIT
- ELECTRIC MANHOLE
- UTILITY POLE
- WATER VALVE
- FIRE HYDRANT
- RIPRAP
- CENTERLINE DITCH
- ABOVE GROUND STEAM PIPE
- DRAINAGE LINES
- OVERHEAD UTILITY
- CHAIN LINK FENCE
- WOOD STOCKADE FENCE
- APPROXIMATE LEASE AND EASEMENT LINE LOCATION (SEE NOTE 11)
- INDEX CONTOUR LINE
- INTERMEDIATE CONTOUR LINE
- VEGETATION

NOTES:

1. BASE MAP INFORMATION SHOWN ON THIS DRAWING WAS DEVELOPED FROM FIELD SURVEY DATA OBTAINED BY BLASLAND, BOUCK & LEE, INC. ON 2/10/99; AS-BUILT FIELD SURVEY OBTAINED BY MAXYMILLIAN TECHNOLOGIES AND PREPARED BY HILL ENGINEERS, ARCHITECTS, & PLANNERS, INC. ON 1/19/00 (CADD FILE NO. MX-36-2.DWG); FIELD SURVEY PERFORMED BY HILL ENGINEERS, ARCHITECTS, & PLANNERS, INC. ON 3/8/00 AND 3/14/00 (CADD FILE NO. SRV-4541.DWG) REVISION A; FIELD SURVEY OF THE BUILDING 71 OPCA, ADJACENT AREA TO THE WEST, AND THE STORMWATER BASIN TO THE NORTHWEST OBTAINED BY SK DESIGN GROUP, INC. ON 12/8/00 (PROJECT NO. 000156); FIELD SURVEY PERFORMED BY HILL ENGINEERS, ARCHITECTS, & PLANNERS, INC. ON 12/27/01; AS-BUILT FIELD SURVEY OBTAINED BY D.R. BILLINGS AND PREPARED BY SK DESIGN GROUP, INC. ON 11/25/03 AND 1/7/04 (PROJECT NO. 020085-LDD); BUILDING 71, OPCA, TOP OF LINER AND LEACHATE COLLECTION SYSTEM PLAN BY BLASLAND, BOUCK & LEE DATED MARCH 2002; AND FIELD SURVEY PERFORMED BY HILL ENGINEERS, ARCHITECTS & PLANNERS, INC. IN JANUARY 2005. CERTAIN FEATURES SHOWN MAY BE APPROXIMATE SINCE SNOW AND ICE ACCUMULATIONS WERE PRESENT AT THE TIME OF CERTAIN SURVEYS.
2. ELEVATIONS SHOWN ARE REFERENCED TO NATIONAL GEODETIC VERTICAL DATUM (NGVD 1929).
3. HORIZONTAL DATUM IS REFERENCED TO THE MASSACHUSETTS STATE PLANE COORDINATE SYSTEM (NAD 1927).
4. CONTOUR INTERVAL EQUALS 1 FOOT.
5. LEASE AND EASEMENT LINE LOCATIONS SHOWN ON THIS DRAWING DIGITIZED FROM PLAN PREPARED BY DESIGN GROUP, INC. ENTITLED "PLAN OF LAND SURVEYED FOR GENERAL ELECTRIC COMPANY", DATED FEBRUARY 18, 1993 (PROJECT NO. 930004) AND ARE APPROXIMATE ONLY.
6. PROPOSED LOCATIONS ARE APPROXIMATE ONLY.



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS

**PROPOSED SANITARY AND STORM
 SEWER PIPELINE LOCATIONS**

