

**United States Environmental Protection Agency**  
**EPA New England**  
**5 Post Office Square, Suite 100**  
**Boston, MA 02109-3912**

March 14, 2011

Mr. Kevin Mooney  
GE Corporate Environmental Programs  
159 Plastics Avenue  
Pittsfield, MA 01201

**RE: 2010 Annual Monitoring Report**  
**1½ Mile Reach Removal Action**  
**GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts**

Dear Mr. Mooney:

EPA has reviewed GE's *2010 Annual Monitoring Report* prepared by Arcadis (January 2011) for the 1½ Mile Reach of the Housatonic River (the "Report"). The Report is subject to EPA approval and 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 and the Natural Resource Trustees, approves the above-referenced Report subject to the following conditions and comments:

- GE shall continue the herbivore control activities that were initiated in December 2010 through spring 2011.

Also, for future inspection and annual monitoring reports, GE shall make the following changes:

- Re-define articulate concrete block (ACB) in the section(s) that discuss the ACB in detail. For example, in this Report, ACB is defined in Section 1.2, but discussed in detail in Section 5.
- If in the future, reseeded is performed, GE shall provide a more detailed description of the grass seed or herbaceous cover seed used.
- Starting on April 1, 2011, the Final Post-Removal Site Control (PRSC) Plan requirements shall supersede the requirements in the Interim PRSC Plan. In addition, if there are any conflicts in requirements in the Final PRSC plan and this Report, the requirements in the Final PRSC Plan shall be followed.

- To be consistent with the language in the 1½ Mile Reach Final Completion Report (FCR) and the Final PRSC Plan going forward, GE shall refer to the Parcel which consists of riverbank property abutting High Street, the East Branch of Housatonic River, and Parcels I8-10-102 and I7-20-101 as “City Layout for High Street” in both the future reports and figures.
- To be consistent with the language in the 1½ Mile Reach FCR and the Final PRSC Plan going forward, GE shall refer to the Parcel which consists of property abutting Deming Street, Elm Street Bridge, River, and Parcel I8-4-8 as “Property abutting Deming Street, Elm Street Bridge, East Branch of Housatonic River, and Parcel I8-4-8” in both the future reports and figures.

EPA reserves the right to perform additional sampling and/or require additional response actions, if necessary, to meet the requirements of the Consent Decree. Except as expressly stated, this Report and EPA’s approval of this Report shall not be deemed to modify the Interim PRSC Plan and the requirements therein.

If you have any questions, please contact me at (413) 236-0969.

Sincerely,



Dean Tagliaferro  
EPA Project Manager

- cc:
- A. Silber, GE
  - M. Carroll, GE
  - R. McLaren, GE
  - J. Bieke, Goodwin Procter
  - J. Ziegler, MA DEP
  - E. Tor, MA DEP
  - K. Pelto, MA DEP (Lead Administrative Trustee)
  - M. Gorski, MA DEP
  - S. Peterson, CT DEP
  - K. Munney, US F&W
  - R. Nasman, Berkshire Gas
  - J. F. Yablonsky, Berkshire Gas
  - Mayor Ruberto, City of Pittsfield
  - C. Mitchell, Pittsfield Conservation Commission
  - B. Landau, Noble and Wickersham
  - J. Kilborn, EPA
  - H. Inglis, EPA
  - R. Howell
  - C. Ferry, ASRC
  - Public Information Repositories (MA and CT)