



GE
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Transmitted via Certified Mail

September 28, 2009

Mr. Roger A. Janson, Director
Water Quality Management Unit
USEPA, Region I
One Congress Street
Suite 1100 (MC CWQ)
Boston, MA 02114-2023

Massachusetts Department of Environmental Protection
WERO – Bureau of Resource Protection
436 Dwight Street
Springfield, MA 01103

Environmental Protection Agency
Water Technical Unit (SEW)
P.O. Box 8127
Boston, MA 02114

**Re: General Electric Company, Pittsfield, Massachusetts
NPDES Permit No. MA0003891
Attachment C – Best Management Practices Plan
BMP A.1.B & A.2.A – Debris Removal From Oil/Water Separators (OWS) and Short-Term OWS Enhancements**

Dear Mr. Janson and et al:

General Electric Company (GE) hereby submits this letter in satisfaction of the requirements under Attachment C-Best Management Practices Plan, BMP A.1.B and A.2.A, of National Pollutant Discharge Elimination System (NPDES) Permit No. MA0003891, herein referenced as the "Permit Modification." This letter describes the removal of sediment and debris from oil/water separators (OWS), OWS modification from an underflow to an overflow arrangement, and reasonable best efforts to increase OWS water storage volumes and solids settling capabilities recently completed in accordance with BMP A.1.B and A.2.A of the Permit Modification.

OWS Sediment and Debris Removal

In accordance with the first bullet of Attachment C BMP A.1.B., GE conducted sediment and debris removal activities at OWS 64W, 64X, 119W, and 64Z. Cleaning activities included the removal of sediment and debris from influent/effluent chambers, drum screen areas and settling bays. In total, GE removed approximately 47 cubic yards (cy) of non-TSCA sediment and debris from OWS 64W, 64X, and 119W and approximately 12 cy of TSCA material from 64Z during cleaning activities. Evacuated materials were staged in roll-off containers at the GE facility. Non-TSCA material was transported to a GE approved CWM Chemical Services, L.L.C. (CWM) facility located in Fairport, NY for off-site disposal. TSCA material will be transported to a GE approved CWM facility located in Model City, N.Y. for off-site disposal.

OWS Modifications

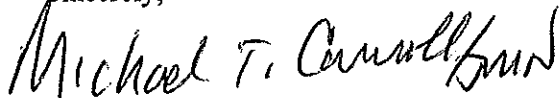
In accordance with the first and second bullets of Attachment C, BMP A.2.A., GE modified OWS 64W, 64X, and 119W from an underflow to an overflow arrangement and made reasonable best efforts to increase water storage volumes and solids settling capabilities. In July and August of 2009, GE completed the installation of overflow weirs at OWS 64W, 64X, and 119W. Figure 1, included as Attachment A, illustrates the typical location of the overflow weir installed at OWS 64W, 64X, and 119W. Overflow weir installation modified each of the OWSs from an underflow to an overflow/underflow arrangement. In addition, overflow weir installation activities increased the water surface elevation within the separator, thereby, increasing the available storage volumes within each OWS. A summary table, included below, indicates the net water surface elevation increase for each OWS. It should be noted that the above referenced modifications were performed at OWS 64Z in October 2006.

Oil/Water Separator	Pre-Modification Water Surface Elevation*	Post-Modification Water Surface Elevation*
64W	974.76 feet	975.05 feet
64X	976.86 feet	978.06 feet
119W	985.11 feet	985.61 feet
64Z	986.57 feet	987.20 feet

*Pre- and post-water surface elevations represent water surface elevations at the maximum operating capacity.

With the performance of OWS sediment/debris removal and modification activities described above, GE has fulfilled the first bullet requirement set forth in BMP A.1.B and the first two bulleted requirements set forth in BMP A.2.A.

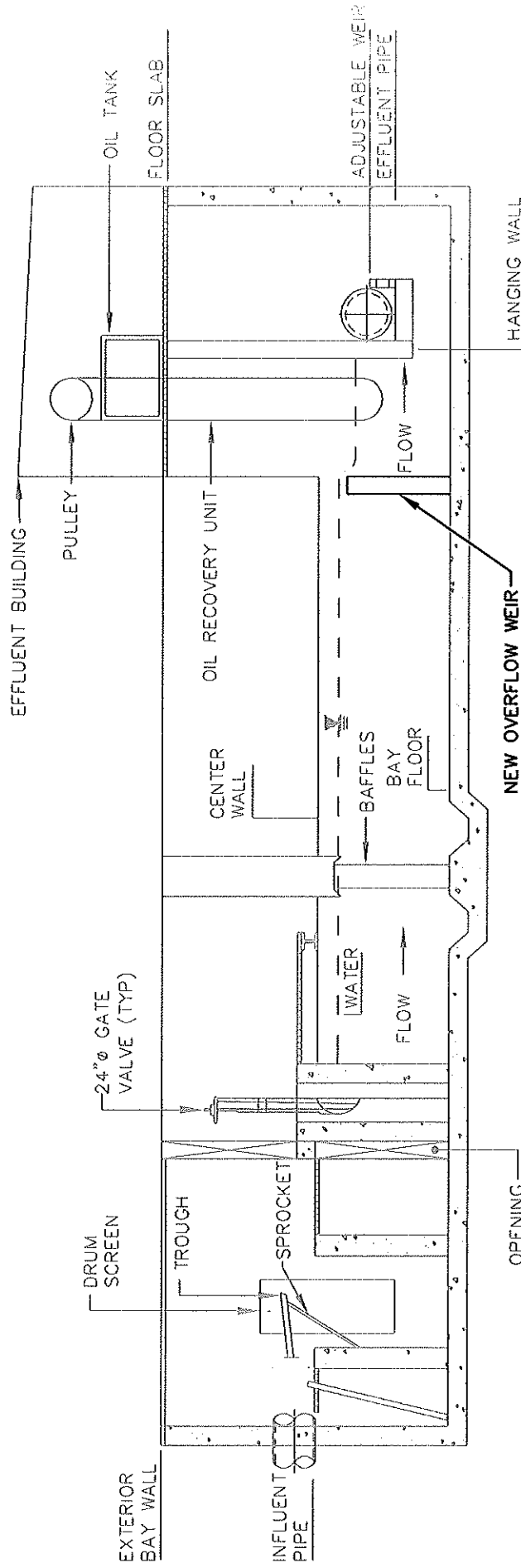
Sincerely,



Michael T. Carroll
Manager of Pittsfield Remediation Programs

Attachment – Figure 1

- cc: T. Conway, EPA
B. Pitt, EPA
D. Tagliaferro, EPA
M. Gorski, MassDEP
D. Howland, MassDEP
P. Hogan, MassDEP
A. Silber, GE
R. McLaren, GE
J. Levesque, GE
K. Mooney, GE
B. Smith, Hunton & Williams
S. Gutter, Sidley Austin
J. Nuss, ARCADIS
M. Higgins, ARCADIS
P. Filippetti, ARCADIS



NOT TO SCALE

GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
**OIL/WATER SEPARATOR CLEANING AND OVERFLOW
 WEIR INSTALLATION ACTIVITIES SUMMARY REPORT**

**TYPICAL OIL/WATER
 SEPARATOR PROFILE**

