



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

April 6, 2010

Mr. Richard W. Gates
Corporate Environmental Programs
General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's January 8, 2010 submittal titled Groundwater Management Area 1, *Addendum to Proposal to Remove/Replace Monitoring Wells – 20s and 30s Complexes*, GE-Pittsfield/Housatonic River Site

Dear Mr. Gates:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Addendum to Proposal to Remove/Replace Monitoring Wells – 20s and 30s Complexes* (the 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 Addendum subject to the following conditions.

1. For wells that GE has proposed, and EPA approved, for abandonment, GE shall locate and properly abandon in accordance with the Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP). For wells that were characterized as lost, GE shall make an additional effort to locate those wells using survey location coupled with a comparison of ground surface elevation with the last known elevation of the top of riser, and geophysical techniques such as metal detectors and shall document its efforts in the next NAPL monitoring report for GMA-1, including the methods utilized and the results of the search. GE shall provide EPA with one week's notice before attempting to locate the lost wells.
2. The observation and detection of NAPL and stained soils, in the 30s Complex as well as potential changes in hydrology resulting from PEDAs construction activities, including the Water Quality Basin, necessitates continued monitoring of groundwater flow to Silver Lake. Additionally, the presence of NAPL relative to the anticipated construction of occupied buildings in this area necessitates continued groundwater monitoring in this area. GE shall install a new well in between the locations of former wells RF-02 and GMA1-10, since the aforementioned factors justify the addition of a groundwater quality monitoring point to the forthcoming long-term groundwater monitoring program when all soil remediation work in this RAA is completed. The new well shall be installed such that it is screened at the water table and located within

approximately 30 feet from the northern edge of the proposed building pad in the southwest corner of the 30s Complex. GE shall verify the location of the proposed building pad with PEDDA prior to proposing the monitoring well location. This well shall be sampled in the interim monitoring program in accordance with EPA's letter conditionally approving GE's GMA-1 Fall 2009 Groundwater Monitoring Report.

3. For all wells in the 20s and 30s Complexes, including, but not limited to, those that are recovered following burial, or other construction-related impact, GE shall inspect and comment on the integrity, including potential deposition of sediment, of these wells prior to using. This shall include a comparison of the actual depth to the well bottom as compared to the depth given in the construction details, and the actual screen interval elevation compared to the groundwater elevation. For wells that were installed by PEDDA that GE proposes to use in the groundwater monitoring program, GE shall assess the long-term viability of these wells since they were not installed with the intent of long-term usage, and shall provide the construction details in all GMA-1 tables that contain such information. GE shall notify EPA a minimum of one week prior to inspecting the wells pursuant to this condition and report the results of these inspections in the ensuing monitoring report. The requirements of this condition will be revisited during each monitoring period where construction activity occurs in the vicinity of an active monitoring well.

4. During Spring 2009 monitoring well redevelopment and NAPL-bailing activities, GE and EPA field personnel determined that GMA 1 monitoring wells U and GG are shown in the wrong locations on the Fall 2008 GMA 1 NAPL Monitoring Program Water Table Contour Map – Figure 10 (Fall 2008 Contour Map), and others.

The location of well U was shown to be approximately 80 feet north northeast of the mapped location. Incidentally, EPA notes that the groundwater contours shown on Figure 10 appear to show an anomalous contour associated with well U, as mapped. The location of well GG was determined to be 11.35 feet east of well LL-R, whereas on Figure 10, it is shown to be approximately 60 feet east southeast of well LL-R.

The locations of these wells, as presented on Figure 1 of the Addendum, are unchanged from those on the Fall 2008 Contour Map. GE shall correct Figure 1 and all future GMA 1 diagrams to show the correct locations of these wells, or otherwise account for and correct the discrepancies.

5. Following the groundwater and NAPL monitoring well modifications, and topographic changes from construction activities, GE shall update the tabulated construction details for future monitoring reports.

6. GE shall propose the specific location of the replacement wells to EPA for approval a minimum of one week prior to installation.

7. GE shall not abandon any wells without receiving prior consent from EPA.

8. EPA reserves the right to require GE to replace and/or install additional monitoring wells in the future.

EPA reserves all of its rights under the Decree, including but not limited to, the right to perform and/or require additional sampling, or response actions, if necessary, to meet the requirements of the Consent Decree. If there is any conflict between the Performance Standards as stated in the Addendum and the Performance Standards as stated in the Consent Decree and SOW, the Consent Decree and SOW shall control.

If you have any questions, please contact me at (617) 918-1721.

Sincerely,



Richard Fisher
GE Facility Project Manager

cc:

Dean Tagliaferro, US EPA
Tim Conway, US EPA
Linda Palmieri, Weston Solutions
Rose Howell, US EPA
Holly Inglis, USEPA
M. Gorski, MDEP
Jane Rothchild, MDEP
John Ziegler, MDEP
Joanne Flescher, MDEP
Eva Tor, MDEP
N. Harper, MA AG
Public Information Repositories

Mike Carroll, GE
Rod McLaren, GE
James Bieke, Goodwin Procter
William Hines, President, Board of Directors, PEDDA
Chris Ferry, ASRC
James Nuss, ARCADIS
J. Ciampa, SPECTRA
Dale Young, MA EOEEA
Mayor James Ruberto, City of Pittsfield
Mark Otis, USACE
Joseph Schmidl, Weston Solutions
Chris Moran, Weston Solutions
Pittsfield Commissioner of Public Health