



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

November 21, 2011

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 August 30, 2011 submittal titled
Groundwater Management Area 3, *Groundwater Quality and NAPL Monitoring Interim
Report for Spring 2011*, GE-Pittsfield/Housatonic River Site

Dear Mr. Gates:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Groundwater Quality and NAPL Monitoring Interim Report for Spring 2011* (the Report). The Report 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 Report subject to the following conditions.

1. GE states that an additional sample will be collected from well 16B-R for PCB analysis in the Fall 2011 monitoring round due to the GW-2 exceedance in the Spring 2011 monitoring round. GE shall not necessarily limit the continued sampling at this well to the Spring 2011 monitoring round for PCBs, but shall maintain this well in the interim monitoring program and continue sampling for PCBs, along with the other analytes given in Table 1 during Spring sampling rounds, until GE proposes and EPA concurs to discontinue such sampling at this well.
2. GE states on page 29 that LNAPL is shown on Figure 8 as being located in a depression and therefore prevented from migrating. EPA notes that the correct figure reference should be Figure 7 rather than Figure 8. Although the data posted on Figure 7 do show slightly higher groundwater elevations to the east of the LNAPL area in wells 51-14 and 51-18, the depicted water table contour lines show a slope to the southeast, toward Unkamet Brook and its drainage area. Thus, the extent to which groundwater flow conditions are acting to prevent LNAPL migration appears to be questionable. GE shall ensure that future statements regarding this subject reflect the fact that groundwater migration may not be fully inhibited to the southeast in the direction of these brooks that drain into the Housatonic River, but that a monitoring well network is in place to check for this, and has not indicated such migration is taking place.
3. GE shall sample monitoring well 39-BR in the Fall of 2011 for VOCs.

4. There are several errors associated with the depiction of the top of peat contours on Figure 8:
 - For borings which did not encounter the peat layer, there are no bottom-of-boring elevations depicted on the figure in accordance with the legend. Additionally, GE shall manually adjust the contours to account for boring depths where the peat layer was not encountered (e.g. RAA10-N-Y20 where the contour shows a peat elevation of approximately 978.5 ft, yet the boring log indicates that the peat must be at an elevation of less than 971.5 ft).
 - The elevation of 977.01 listed for well 78B-R should be listed as (<977.01) as the boring log for this well indicates that the peat layer was not encountered to the bottom of the boring.
 - Boring RAA10-N-Y20 was advanced to approximate elevation 971.5 without encountering the peat layer, yet the top of peat contour lines around this boring indicate a top of peat elevation between 978 and 979.
 - The 984 contour line is mislabeled as 982 in the area north of RAA10-N-EE20.
 - The text label for the top peat contour line in the legend includes extraneous text about water table elevation which should be deleted.

The boring logs for 78B-R and RAA10 -N-Y20 indicate the existence of a deeper trough in the top of peat surface than is currently depicted to the east of RAA10-N-Y18 and GMA3-16; both of which encountered NAPL impacted soils immediately above the top of peat. Well 78B-R is not a suitable DNAPL monitoring well as it does not intersect the lower permeability layer of the peat in this area

GE shall advance additional soil borings in this area to better define the top of peat elevation and extent of fill materials which appear to have been placed on top of the peat layer. Two soil borings shall be completed adjacent to RAA10-N-X19 and RAA10-N-Y20. Soil samples shall be collected, logged for geologic description, and screened with a PID continuously from ground surface until the top of the peat layer is encountered, or a maximum depth of 25 ft (i.e., at approximately 965 feet in elevation). If DNAPL-impacted soils are present in any of the borings, GE shall propose, for EPA approval, a location for DNAPL monitoring(s) well capable of monitoring the top of the peat layer for the presence of DNAPL in the deepest portion of the peat layer trough.

GE shall provide in the Fall 2011 report a revised cross-section for section C-C and a revised top of peat figure that incorporates the results of these borings and the other comments made above.

5. GE shall continue taking measures to acquire permission to access monitoring wells GMA3-5 and OBG-2.
6. GE shall, in subsequent reports, not show the extent of NAPL as disconnected, such as shown on Figures 7 and 10, when there is no intermediate well data between two nearby NAPL data points to suggest such a discontinuity (e.g. between wells 51-5 and 51-8) and when no other

reasons exist to suggest such a discontinuity. In the event that GE relies on such other reasons, it shall provide the rationale in the monitoring report for EPA review and approval.

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 Report 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:

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