



**United States Environmental Protection Agency
One Congress Street, Suite 1100
Boston, MA 02114-2023**

January 10, 2007

Mr. Andrew T. Silfer
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 October 30, 2006 submittal titled Groundwater Management Area 1, *Evaluation of Additional Recovery Measures and Proposal to Install LNAPL Recovery Well – 60s Complex*, GE-Pittsfield/Housatonic River Site

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Evaluation of Additional Recovery Measures and Proposal to Install LNAPL Recovery Well – 60s Complex* (Evaluation, dated October 30, 2006). The Evaluation was supplemented by a faxed letter with attachments (Supplement) sent from Nick Smith (BBL on behalf of GE) to Richard Fisher (EPA) on December 14, 2006. The Evaluation with Supplement 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 Evaluation with Supplement, subject to the following conditions.

GE shall complete the construction as described in the Evaluation with Supplement. The as-built plans, or the proposed design if the well has not yet been installed, shall be included with the forthcoming Fall 2006 NAPL Report.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Fisher", written over a horizontal line.

Richard Fisher
GE Facility Project Manager

Attachment: Email from Nick Smith (BBL on behalf of GE) to Richard Fisher (EPA) on December 14, 2006

cc:


Dean Tagliaferro, US EPA
Mike Carroll, GE
John Kilborn, US EPA
Rose Howell, US EPA
Holly Inglis, USEPA
Susan Steenstrup, MDEP
Anna Symington, MDEP
Jane Rothchild, MDEP
N. Harper, MA AG
K.C. Mitkevicius, USACE
Public Information Repositories

Tim Conway, USEPA
Richard Gates, GE
Rod McLaren, GE
James Bieke, Goodwin Procter
James Nuss, Arcadis BBL
Dale Young, MA EOE
Mayor James Ruberto, City of Pittsfield
Dale Young, MA EOE
Pittsfield Commissioner of Public Health
Linda Palmieri, Weston Solutions



"Smith, Nick"
<ns@bbl-inc.com>
12/14/2006 10:41 AM

To: Richard Fisher/R1/USEPA/US@EPA, "Moran, Chris"
<Chris.Moran@WestonSolutions.com>
cc: "Gates, Richard (GE, Corporate)" <richard.gates@ge.com>, "Kirsch, Laurence S" <lkirsch@goodwinprocter.com>, jciampa@spectraenv.com, "Silfer, Andrew (GE, Corporate)"
bcc:
Subject: GMA 1 - Addendum to Evaluation of Additional Recovery Measures and Proposal to Install LNAPL Recovery Well - 60s Complex

History:  This message has been replied to and forwarded.

On October 30, 2006, the General Electric Company (GE) submitted a letter report titled *Evaluation of Additional Recovery Measures and Proposal to Install LNAPL Recovery Well - 60s Complex* (October 30, 2006 Proposal). In that report, GE evaluated the location and specifications of potential groundwater/LNAPL recovery wells within the former scrapyard area within the East Street Area 2-South/60s Complex portion of Groundwater Management Area 1 (GMA 1) and proposed to install a new LNAPL recovery well in the former scrapyard area.

In a November 30, 2006 communication, you requested additional information regarding that proposal, specifically:

- Copies of Figure 1 (BBL Site Plan) and Appendix A Figures 1 and 2 (Golder Associates, Particle Starting Locations, Spring and Fall) in the Submittal with 0.5-ft groundwater elevation contours;
- Well construction and design details, including the proposed gravel/sand pack around the well; and
- Design rationale detailing the choice of the recovery well location when considering the seemingly increased NAPL productivity as moving from location GMA1-16 toward GMA1-19 (based on Tables 2 and 3 of the submittal).

The figures and well schematic presenting the well construction and design details requested above are attached.

In regard to the location of the proposed recovery well location, the primary goal of the proposed LNAPL recovery activities in this area is to control any LNAPL migration. Although the initial manual LNAPL recovery at well GMA1-19 has been greater than that at well GMA1-16, GE believes that a single LNAPL recovery well located near the center of the downgradient edge of the known LNAPL extent between monitoring wells GMA1-16 (eastern extent of LNAPL) and GMA1-19 (western extent of LNAPL) will more effectively contain and recover all of the LNAPL in this area than a recovery well offset toward one side of the LNAPL area. As discussed in the October 30, 2006 Proposal, the results of the groundwater flow model constructed to identify the capture zone of a potential automated recovery system in this area showed that a single groundwater recovery well located approximately midway between wells GMA1-19 and GMA1-16 would provide hydraulic control over the entire southern portion of the scrapyard area. Therefore, GE proposed to install recovery well RW-3 at this midpoint location.

Please call Andrew Silfer, Richard Gates, or me if you have any additional questions regarding this proposal.

Nicholas A. Smith
Senior Project Scientist II
Blasland, Bouck & Lee, Inc.

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SitePlan.pdf

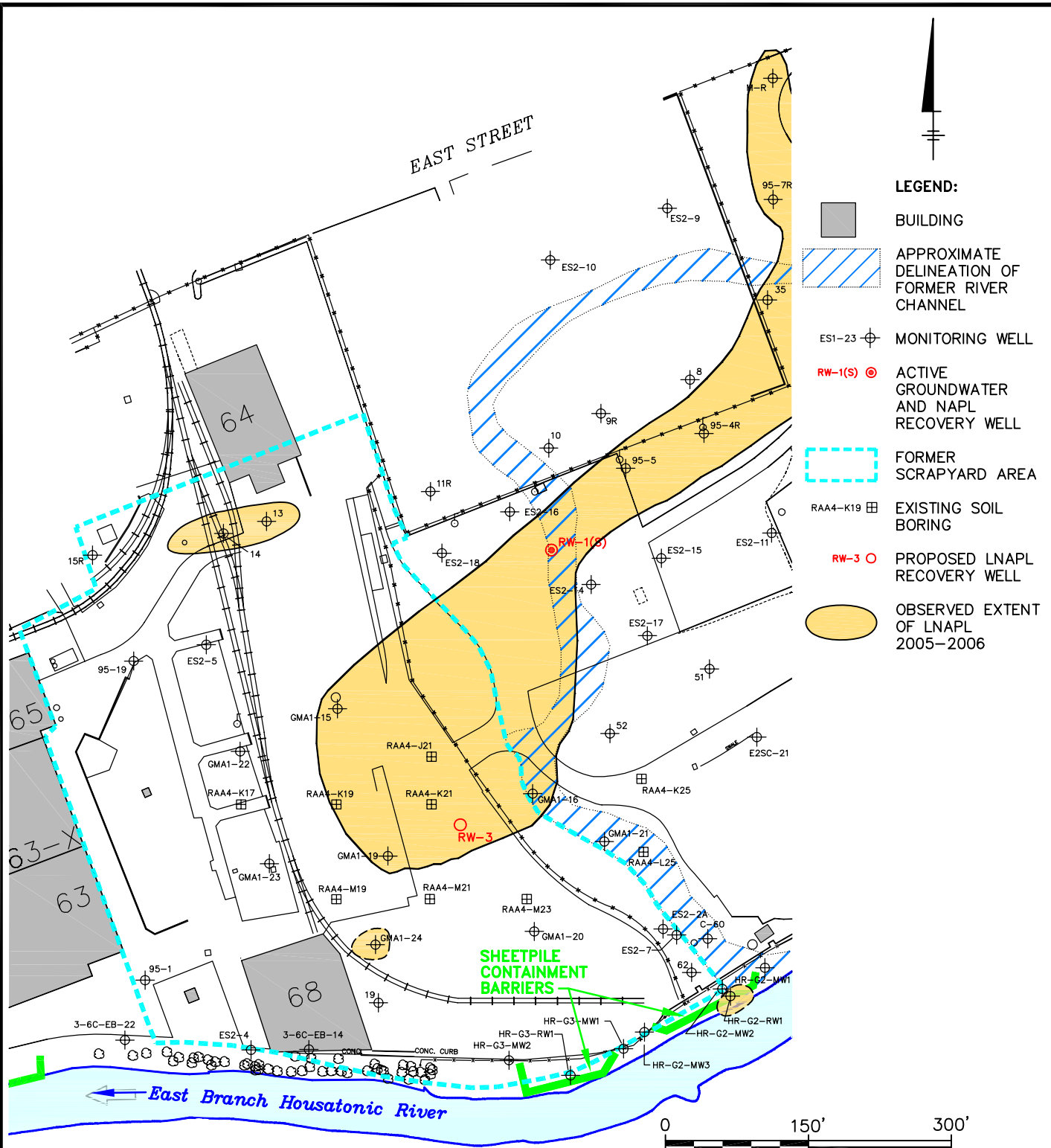


GWcontours.pdf



WellSchematic.pdf

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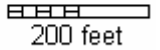
- MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1990; DATA PROVIDED BY GENERAL ELECTRIC COMPANY, AND BLASLAND AND BOUCK ENGINEERS, P.C. CONSTRUCTION PLANS.
- NOT ALL PHYSICAL FEATURES SHOWN.
- SITE BOUNDARY IS APPROXIMATE.
- ALL MONITORING WELL LOCATIONS ARE APPROXIMATE.

GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
GMA 1 NAPL MONITORING PROGRAM

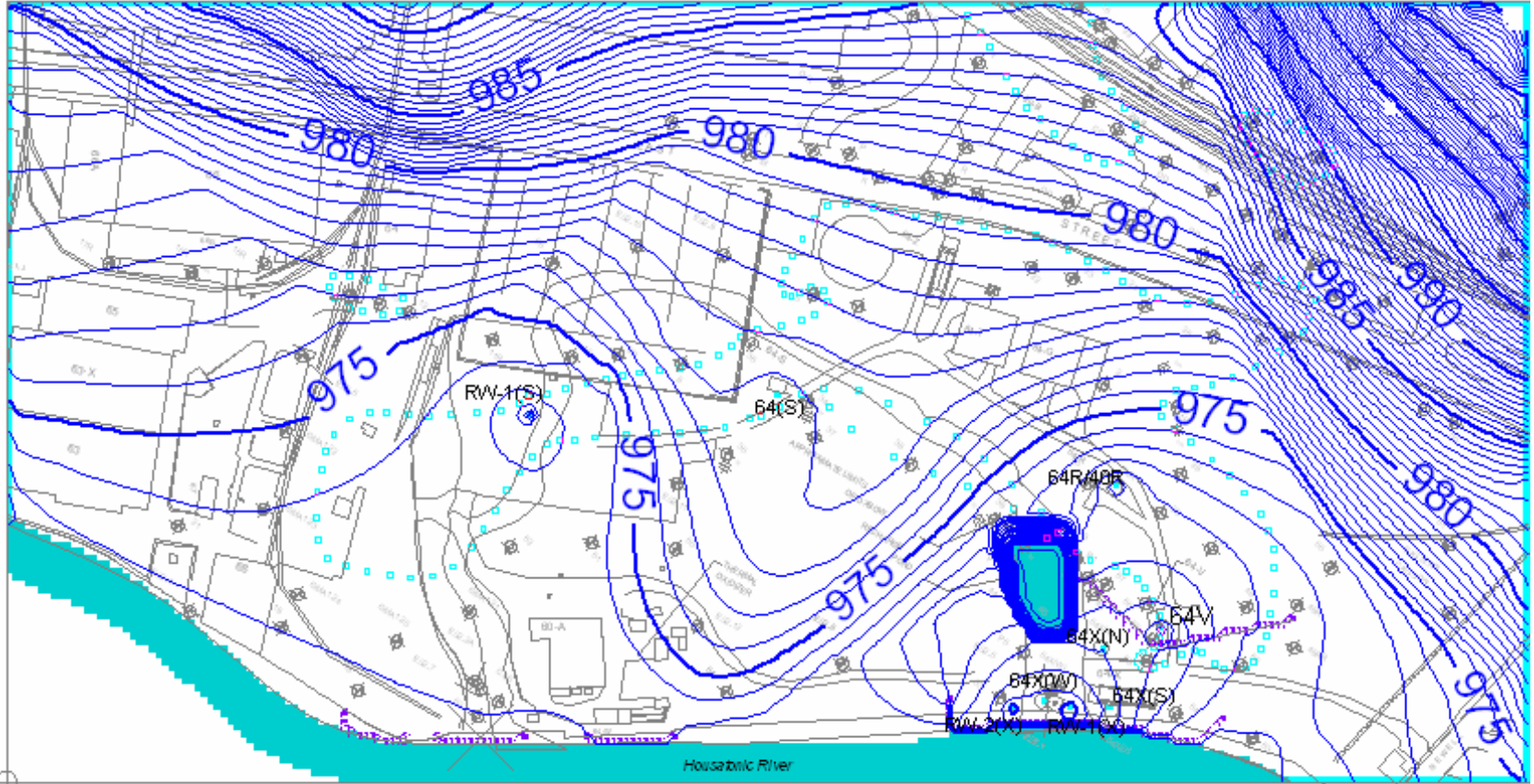
SITE PLAN


 an ARCADIS company

FIGURE
1



Spring1-06.gww Existing Conditions



Contouring Interval 0.5 Feet

Run:Spring1-06.gww

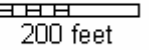
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DR BY:	FG	DATE:	12/06/06
CHK BY:	JJE	FILE No.:	Figures 1 to 6.doc
REV BY:	FG	DIRECTORY:	063-6424\2006 Model

Simulated Hydraulic Heads and Particle Starting Locations - Spring

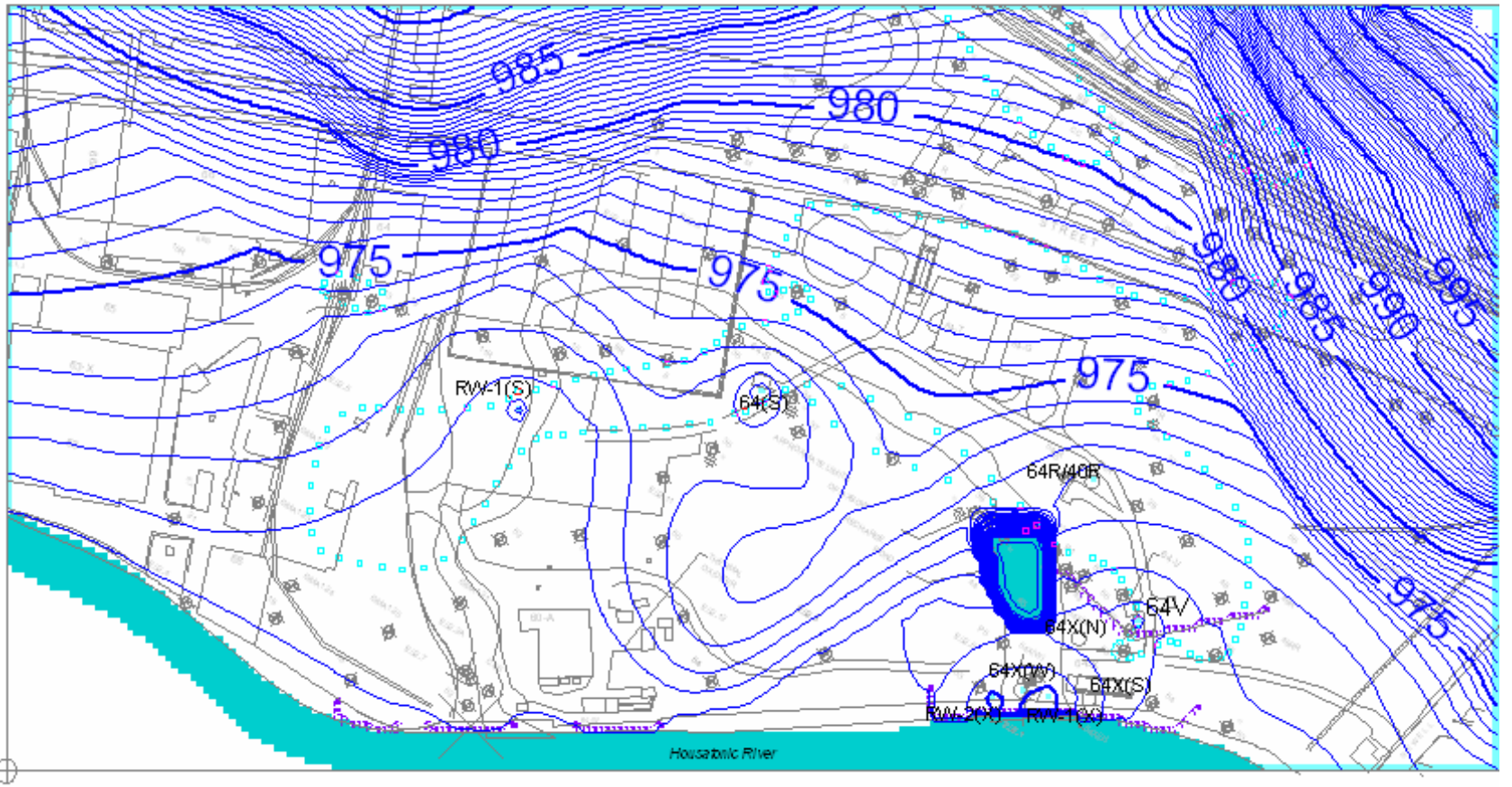
GENERAL ELECTRIC

FIGURE: **1**

Goldner Associates



fall1-06.gww Existing Conditions



Contouring Interval 0.5 Feet

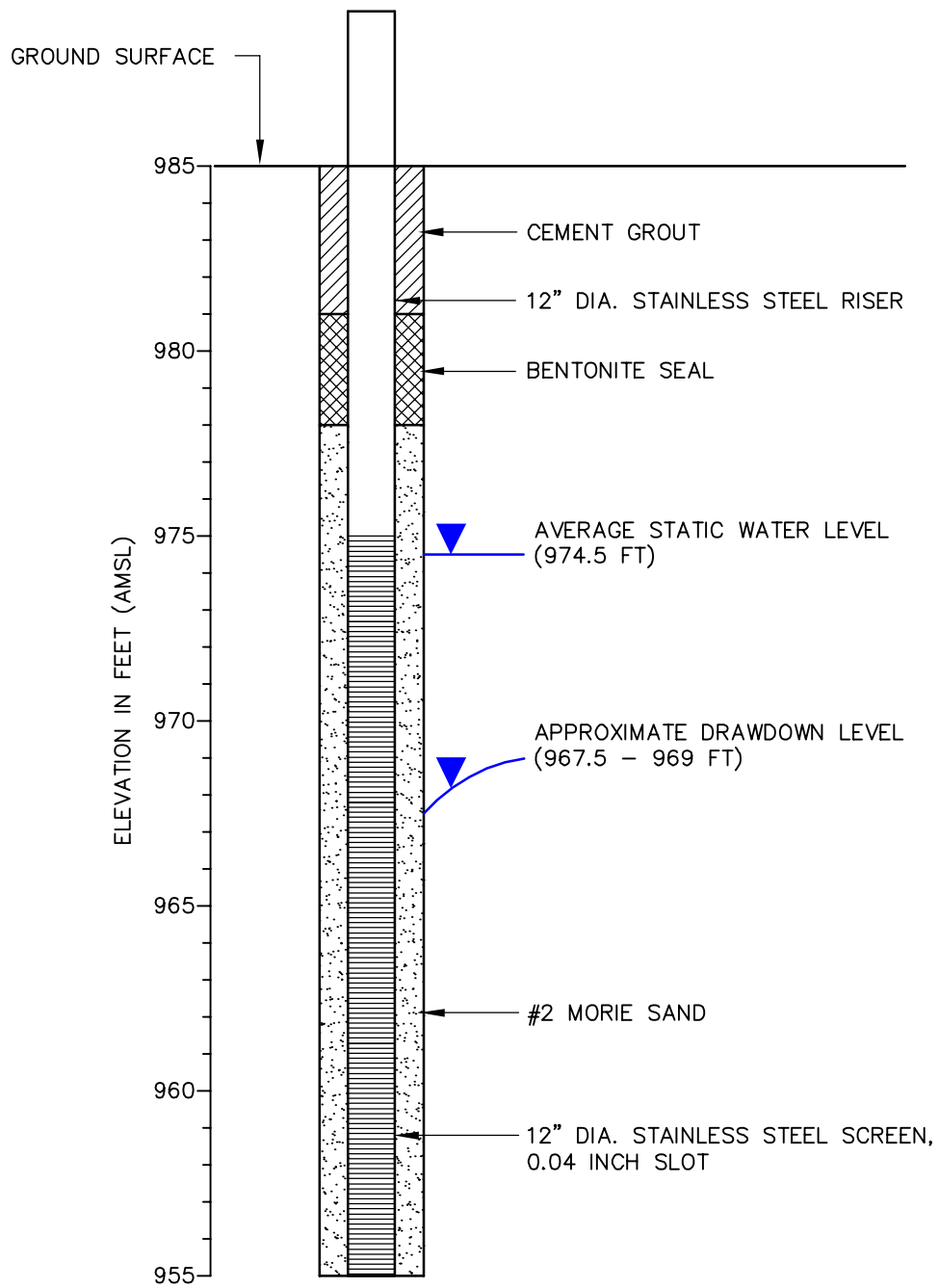
Run: fall 1-06.gww

JOB No.:	063-6424	SCALE:	AS SHOWN
DR BY:	FG	DATE:	12/06/06
CHK BY:	JJE	FILE No.:	Figures 1 to 6.doc
REV BY:	FG	DIRECTORY:	063-6424\2006 Model

Golden Associates

GENERAL ELECTRIC	Simulated Hydraulic Heads and Particle Starting Locations - Fall
FIGURE:	2

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PITTSFIELD, MASSACHUSETTS
GMA 1 NAPL MONITORING PROGRAM

PROPOSED RECOVERY WELL DETAIL



FIGURE
1