



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

Via Electronic Mail Only

Date in Electronic Signature

Mr. Robert G. Gibson
Senior Project Manager
General Electric Company
1 River Road – Bldg. 5-7W
Schenectady, NY 12345

Re: Conditional Approval of GE's *Revised Pre-Design Investigation Work Plan for Reach 6*
Housatonic Rest of River
GE-Pittsfield/Housatonic River Site

Dear Mr. Gibson:

On May 1, 2023, the General Electric Company (GE) submitted a document titled *Revised Pre-Design Investigation Work Plan for Reach 6* (the "Revised PDI Work Plan") to the United States Environmental Protection Agency (EPA). The PDI Work Plan was submitted as a condition of EPA's March 2, 2023 conditional approval letter requiring revisions to the November 3, 2022 version of the Work Plan.

The Revised PDI Work Plan was submitted in accordance with Section 4.2.2.2 of GE's *Final Revised Rest of River Statement of Work*, approved by EPA on September 16, 2021, and Section 4 of GE's *Final Revised Overall Strategy and Schedule for Implementation of the Corrective Measures* ("Final Revised OSS"), approved by EPA on July 6, 2022. The Revised PDI Work Plan is subject to the terms and conditions specified in the Consent Decree and the December 2020 Revised Final Permit ("Final Permit").

Pursuant to Section XV of the Consent Decree governing the response action, EPA, after providing reasonable opportunity for review and comment by the Commonwealth of Massachusetts and the Connecticut Department of Energy and Environmental Protection, approves the Revised PDI Work Plan subject to the following condition.

General Comment

1. Four islands east of EA 56/56a located in the transition zone between Reaches 5C and 6 were inadvertently excluded by EPA from a Human Health Risk Assessment exposure area. EPA is concerned these islands may be used by waterfowl hunters, so GE shall add these islands to Exposure Area 56a. The Reach 6 PDI shall include collection of

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Revised Pre-Design Investigation Work Plan for Reach 6
GE-Pittsfield/Housatonic River Site*

additional floodplain soil samples from these four islands from the 0- to 6-inch and 6- to 12-inch depth intervals as shown on the figure attached to this CAL. The historical and PDI floodplain soil data associated with these islands shall be incorporated into the floodplain evaluations to be conducted for Exposure Areas 56 and 56a.

EPA reserves all of its rights under the Consent Decree and the Revised Final Permit, 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 and/or the Revised Final Permit (December 2020). If there is any conflict between the Performance Standards as stated in the submittal and the Performance Standards as stated in the Consent Decree or the Revised Final Permit, the Consent Decree and/or the Revised Final Permit shall control.

Please do not hesitate to contact me at (617) 918-1720 or at fontaine.joshua@epa.gov should you have any questions in this regard.

Sincerely,

JOSHUA FONTAINE

Digitally signed by JOSHUA
FONTAINE

Date: 2023.06.20 08:47:56 -04'00'

Joshua Fontaine
Project Manager

Attachment:

Figure 1: Additional Floodplain PDI Sample Locations

cc: via electronic mail only:
Andrew Silfer, GE
Andrew Thomas, GE
Matthew Calacone, GE
Kevin Mooney, GE
James Bieke, Sidley Austin LLP
Michael Werth, Anchor QEA
Dean Tagliaferro, EPA
Anni Loughlin, EPA
Christopher Smith, EPA
Tim Conway, EPA
John Kilborn, EPA
Christopher Ferry, ASRC (EPA electronic repository)
Thomas Czelusniak, HDR Inc.
Scott Campbell, Taconic Ridge Environmental
Izabela Zapisek, Taconic Ridge Environmental

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John Ziegler, Massachusetts DEP
Ben Guidi, Massachusetts DEP
Michael Gorski, Massachusetts DEP
Michelle Craddock, Massachusetts DEP
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Carol Papp, Connecticut DEEP
Graham Stevens, CT DEEP
Lori DiBella, Connecticut Attorney General's Office
Molly Sperduto, U.S. Fish and Wildlife
Field Supervisor, U.S. Fish and Wildlife
Mark Barash, U.S. Department of Interior
Ken Finkelstein, NOAA
Mayor Linda Tyer, City of Pittsfield
Jim McGrath, City of Pittsfield
Andi Cambi, Pittsfield Health Director
Michael Coakley, Pittsfield Economic Development Authority
Nate Joyner, Pittsfield Community Development & Housing Program,
Melissa Provencher, Berkshire Regional Planning Commission
Christopher J. Ketchen, Chief Administrative Officer, Lenox
Christopher Brittain, Town Administrator, Lee
Mark Pruhenski, Town Manager, Great Barrington
Michael Canales, Town Administrator, Stockbridge
Rhonda LaBombard, Town Administrator, Sheffield
Jim Wilusz, Health Agent for Tri Town Health Department
Bettina Washington, THPO, Wampanoag Tribe of Gay Head (Aquinnah)
Mark Andrews, TCRM Wampanoag Tribe of Gay Head (Aquinnah)
Bonnie Hartley, SMC
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Chairman Russell, SIT
Jeffery Bendremer, THPO, Stockbridge-Munsee Community
Brona Simon, Massachusetts Historical Commission
Edward Bell, Massachusetts Historical Commission
Repository, David M. Hunt Library in Falls Village, CT

FIGURE 1: ADDITIONAL FLOODPLAIN PDI SAMPLE LOCATIONS

