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Transmitted via Overnight Delivery

October 11, 2010

Ms. Susan Svirsky
U.S. Environmental Protection Agency
c/o Weston Solutions, Inc.
10 Lyman Street
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
Rest of River (GEC850)
Revised Corrective Measures Study Report**

Dear Ms. Svirsky:

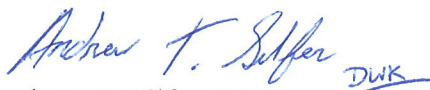
Enclosed for the General Electric Company (GE) is a Revised Corrective Measures Study (CMS) Report for the Rest of River. This Revised CMS Report is submitted pursuant to Special Condition II.G of the Reissued RCRA Corrective Action Permit (the Permit) issued by the U.S. Environmental Protection Agency (EPA) to GE for the Rest of River and correspondence from EPA, including its letters of January 15, 2010 providing conditional approval of GE's *Work Plan for the Evaluation of Additional Remedial Alternatives* and June 24, 2010 regarding the schedule for submitting the Revised CMS Report. This report evaluates various alternatives for addressing the sediments and floodplain soils in the Rest of River area and for handling sediments or soils removed from the River and floodplain. Submission of this Revised CMS Report is subject to GE's reservations of rights set forth in this report (including in Section ES.1, Section 1.2, and Section 11).

In addition, we are enclosing a separate document titled *Evaluation of Remedial Alternatives Using Sound Ecological Assumptions*. As required by the Permit, the evaluations presented in the Revised CMS Report take into account EPA's Human Health Risk Assessment (HHRA) and Ecological Risk Assessment (ERA) for the Rest of River, even though GE disagrees with many of the assumptions, PCB toxicity values, interpretations, and conclusions in the HHRA and ERA, as well as other EPA directives for conducting the CMS. GE has prepared this separate document to discuss the implications of using assumptions, PCB toxicity values, interpretations, and conclusions that, unlike those used by EPA, are scientifically sound. This document contains a brief discussion of the evidence on the human health effects of PCBs and the impact of a scientifically supportable interpretation of that

evidence on the assessment of whether the remedial alternatives considered in the Revised CMS Report would provide protection of human health. However, the main focus of this separate document is to illustrate the impact of applying scientifically sound assumptions and interpretations of the ecological studies and data used in EPA's ERA to evaluate the extent to which the various remedial alternatives would provide protection of the environment.

Please call me if you have any questions.

Very truly yours,



Andrew T. Silfer, P.E.
GE Project Coordinator

Enclosures

cc: James T. Owens, III, EPA
Richard Cavagnero, EPA
Dean Tagliaferro, EPA
Timothy Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA (cover letter only)
Ian Bowles, MA EOEEA (cover letter and CD)
Kenneth Kimmell, MA EOEEA
Laurie Burt, MDEP
Michael Gorski, MDEP (cover letter and CD)
Eva Tor, MDEP (cover letter and CD)
John Ziegler, MDEP (2 hard copies and CD)
Karen Pelto, MDEP
Mary Griffin, MA DFG
Richard Lehan, MA DFG (cover letter and CD)
Mark Tisa, MA DFG (cover letter and CD)
Nancy E. Harper, MA AG (cover letter and CD)
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Jeffrey Porter, Mintz, Levin
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