

2007 represented the fifth year that water column monitoring was conducted following restoration of the Upper ½-Mile Reach, and therefore marked the completion of the water column monitoring program detailed in the Work Plan.

Over the past five years, GE has collected 28 water column samples associated with the Upper ½-Mile Reach water column monitoring program. Of these 28 samples, only five have had analytical results that indicated the presence of PCBs above the standard reporting limit. Further, all of five of these results were from unfiltered water samples; none of the 28 filtered sample results indicated the presence of PCBs. Additionally, only one of these results was from within the past two years (low-flow sample on 03/26/06), and this sample was collected upstream of the Upper ½-Mile Reach at the Newell Street location. Considering these data, GE proposes to terminate this specific sampling program as part of the Upper ½-Mile Reach monitoring activities. Water column sampling will continue to be performed and reported as part of the ongoing monthly water column sampling efforts being performed under the Housatonic River Monthly Water Column Sampling Program.

8.5 Isolation Layer Sampling

Overall, as discussed in the 2007 Sediment Summary Letter Report (Appendix D), the available isolation layer sampling data do not show a consistent pattern indicative of PCB transport from the underlying sediments and do not allow any definitive conclusions regarding the performance of the isolation layer relative to the long-term predictions on which the isolation layer design was based. It is too early to make any such conclusion. However, as also discussed in that report, the data do indicate that, at the present time, the isolation layer is preventing the migration of PCBs from the underlying sediments to the surface of the isolation layer. In these circumstances, GE does not believe that any corrective action is necessary or required at this time to address the isolation layer.

GE proposes the collection and analysis of an additional round of isolation layer samples at the same general time as the “10-Year” deposited sediments sampling events (currently anticipated for 2012). This proposal is included in Table 8-1. Based on review of those results, GE will further evaluate the effectiveness of the isolation layer. In addition, at that time, GE will evaluate the scope and frequency of further long-term monitoring of the isolation layer, and will make a proposal to EPA regarding such further monitoring.

8.6 Deposited Sediment Sampling

The PCB data from the deposited sediments collected from the Upper ½-Mile indicate the presence of low levels of PCBs in the materials that have been deposited on top of the armor stone since completion of the Upper ½-Mile sediment remediation and restoration

activities. Overall, as discussed in the 2007 Sediment Summary Letter Report (Appendix D), it cannot be concluded that the PCBs in the Upper ½-Mile surface sediments are attributable to sources other than those that have been or are being addressed by GE at the Pittsfield/Housatonic River Site (as defined in the Work Plan). In these circumstances, in accordance with the Work Plan, GE believes that no further response actions are required at this time to address the PCBs in the surface of the Upper ½-Mile sediments.

As required by the Work Plan, GE will conduct two additional rounds of deposited sediment sampling at 5-year intervals – i.e., the “10-Year” sampling event (currently anticipated for 2012) and the “15-Year” sampling event (currently anticipated for 2017). A summary of these events is included in Table 8-1. Upon the conclusion of that program, GE will evaluate the scope and frequency of further long-term monitoring of the deposited sediment, and will make a proposal to EPA regarding such further monitoring.

8.7 Future Reporting

GE proposes to include the results from the long-term monitoring events described above in an annual report to be submitted with EPA. In addition, interim trip reports will be submitted as appropriate.

**General Electric Company
Pittsfield, Massachusetts**

2007 Annual Monitoring Report

**Upper ½-Mile Reach of the
Housatonic River**

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