



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ONE CONGRESS STREET, SUITE 1100
BOSTON, MA 02114-2023

September 7, 2004

Mr. Andrew T. Silfer
Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Comments on General Electric's February 18, 2004 *Unkamet Brook Area, Interim Pre-Design Investigation Report and Additional Pre-Design Investigation Proposal*
GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter provides the Environmental Protection Agency's (EPA) conditional approval of the above-referenced *Unkamet Brook Area, Interim Pre-Design Investigation Report and Additional Pre-Design Investigation Proposal*, (Proposal) dated February 18, 2004. The Proposal 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 above-referenced submittal subject to the following conditions which are presented below.

1. In Section 2.1, GE states that sampling of surficial sediments within Decorative Pond for PCBs is not warranted based on a number of factors including: the fact that the concentration of PCBs in the sediments accumulated within the flow-control structure is less than 2 ppm; the uncertain timeframe over which sediment accumulated within the flow-control structure; and, the reasonable likelihood that the accumulated sediment present in the flow-control structures may have come from Unkamet Brook (rather than Decorative Pond) and has been retained in the flow-control structures. EPA disagrees with GE's position. Consequently, EPA will collect three samples within the Decorative Pond and analyze those samples for total PCBs. EPA will subsequently provide the results of this sampling to GE for inclusion in the database for the Unkamet Brook Area. EPA may require GE to propose and conduct further sampling and investigation of the Decorative Pond based upon the results of EPA's sampling.

2. As stated in Section 3.0 of the Proposal, GE shall submit a supplemental sampling report on the results of the additional PCB sampling of the northern inundated wetland area within four months of the date of this letter. GE shall also submit the Pre-Design Investigation Report for the Unkamet Brook Area within 12 months of the date of this letter.

EPA reserves its right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the Consent Decree.

If you have any questions, please contact me at (617) 918-1240.

Sincerely,



William P. Lovely, Jr.
GE Facility Project Manager

cc:

John Novotny,	GE
James Bieke,	Shea & Gardner
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Susan Steenstrup,	MDEP
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