GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Delivery

October 3, 2007

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
Unkamet Brook Area (GECD170)
Proposal for Additional Supplemental PCB Pre-Design Investigations

Dear Ms. Svirsky:

On July 27, 2007, the General Electric Company (GE) submitted a document to the United States Environmental Protection Agency (EPA) titled *Supplement to the Pre-Design Investigation Report for Unkamet Brook Area Removal Action* (PDI Supplement). That report summarized the results of previous supplemental investigations and proposed additional investigations to further assess the presence of polychlorinated biphenyls (PCBs) in certain areas. Specifically, additional PCB investigations were proposed at three locations on Parcels L11-4-11 and L12-1-101 (Figure 1) to determine the extent of PCBs in the vicinity of the boundary of the Unkamet Brook Area Removal Action Area (Unkamet Brook Area). Prior to the submittal of the PDI Supplement, GE and EPA discussed the scope of additional PCB investigations and EPA approved the scope of the additional PCB investigations in an electronic mail message to GE on July 18, 2007. The PDI Supplement documented the planned investigations as had been discussed and agreed to with EPA, and GE conducted the additional PCB investigations on August 30, 2007. As described below, the results of those investigations suggest the need for further investigations in one of the three areas sampled in August 2007. The results of the August 2007 PCB investigations and the proposed additional PCB investigations are discussed below.

A. Summary of Supplemental Pre-Design Investigations

As indicated in the PDI Supplement, GE identified one location (E-BBB27) within Parcel L11-4-11 and two locations (E-KKLL6.5 and E-MMNN8.5) within Parcel L12-1-101 where additional sampling was necessary within the 0- to 1-foot depth increment to further define the presence of PCBs in soil at the Unkamet Brook Area. Specifically, GE proposed additional investigations based on analytical results observed in the following three samples: (1) the 0- to 1-foot sample from location E-AAABBB27 on Parcel L11-4-11, which had a PCB detection of 100 parts per million (ppm); (2) the 0- to 1-foot sample from location E-KK5.5 on Parcel L12-1-101, which had a PCB detection of 3.9 ppm; and (3) the 0- to 1-foot sample from location E-MM7.5 on Parcel L12-1-101, which had a PCB detection of 2.8 ppm.

The preliminary results of the additional PCB investigations conducted in August 2007 are provided in Table 1 and the above-referenced sample locations are shown on Figure 1. Please note that the analytical results summarized on Table 1 are preliminary and have not yet undergone data validation. The preliminary data provided in Table 1, along with data collected as proposed herein, will be validated in accordance with *Section 7.5 of the Field Sampling Plan/Quality Assurance Project Plan* (FSP/QAPP) and the results of the data validation will be included in a forthcoming submittal to EPA.

B. Assessment of Additional PCB Data Needs

Based on a review of the PCB analytical results summarized in Table 1, in combination with prior data, GE has identified the need for additional PCB investigations to the south of sample location E-BBB27. As indicated in Table 1, PCBs were detected at this location above 2 ppm within the 0- to 1-foot depth increment at a concentration of 56.5 ppm (50.6 ppm in the duplicate sample). Accordingly, GE proposes to collect samples from the 0- to 1-foot depth increment at three locations (E-BBBCCC27, E-CCC27, and E-CCCDDD27) to the south of sample location E-BBB27 to further understand the presence of PCBs in this area (Figure 1). As indicated on Table 2, GE proposes to initially analyze the PCB sample collected from location E-BBBCCC27, while holding the remaining two samples for potential analysis based on the results from sample location E-BBBCCC27.

C. Schedule

GE anticipates that the additional PCB investigations described herein can be completed within approximately three weeks from EPA's approval of this letter, subject to obtaining the necessary access permission. The PCB analytical results from this sampling will be provided to EPA in a forthcoming submittal.

Please call me if you have any questions or comments regarding this proposal.

Sincerely,

Richard W. Gates/ace

Richard W. Gates
Remediation Project Manager

Attachments

cc: Dean Tagliaferro, EPA
Rose Howell, EPA*
Holly Inglis, EPA
Tim Conway, EPA
John Kilborn, EPA
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Robert Bell, MDEP*
Nancy E. Harper, MA AG*
Dale Young, MA EOEA*
Mayor James Ruberto, City of Pittsfield
Linda Palmieri, Weston (2 copies)
Michael Carroll, GE*
Rod McLaren, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter LLP
Kevin Boland, CSX Transportation
Property Owner – Parcel L12-1-101
Public Information Repositories
GE Internal Repository

* *cover letter only*

Tables

TABLE 1
SUMMARY OF PCB ANALYTICAL RESULTS OBTAINED DURING AUGUST 2007

PROPOSAL FOR ADDITIONAL SUPPLEMENTAL PCB PRE-DESIGN INVESTIGATIONS
UNKAMET BROOK AREA
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth(Feet)	Date Collected	Aroclor-1016, -1221, -1232, -1242, -1248	Aroclor-1254	Aroclor-1260	Total PCBs
RAA10-E-BBB27	0-1	8/30/2007	ND(3.5) [ND(3.5)]	49 [45]	7.5 [5.6]	56.5 [50.6]
RAA10-E-KKLL6.5	0-1	8/30/2007	ND(0.31)	0.46	1.4	1.86
RAA10-E-MMNN8.5	0-1	8/30/2007	ND(0.065)	0.28	0.68	0.96

Notes:
1. Samples were collected by ARCADIS BBL, and were submitted to SGS Environmental Services, Inc. for analysis of PCBs.
2. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.
3. Field duplicate sample results are presented in brackets.

TABLE 2
PROPOSED ADDITIONAL SUPPLEMENTAL PCB SAMPLING

PROPOSAL FOR ADDITIONAL SUPPLEMENTAL PCB PRE-DESIGN INVESTIGATIONS
UNKAMET BROOK AREA
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Sample ID	Depth (feet)	Analysis
E-BBBCCC27	0-1	Analyze
E-CCC27	0-1	Extract and Hold
E-CCCDDD27	0-1	Extract and Hold

Note:
1. Proposed sample locations are shown on Figure 1.

Figure

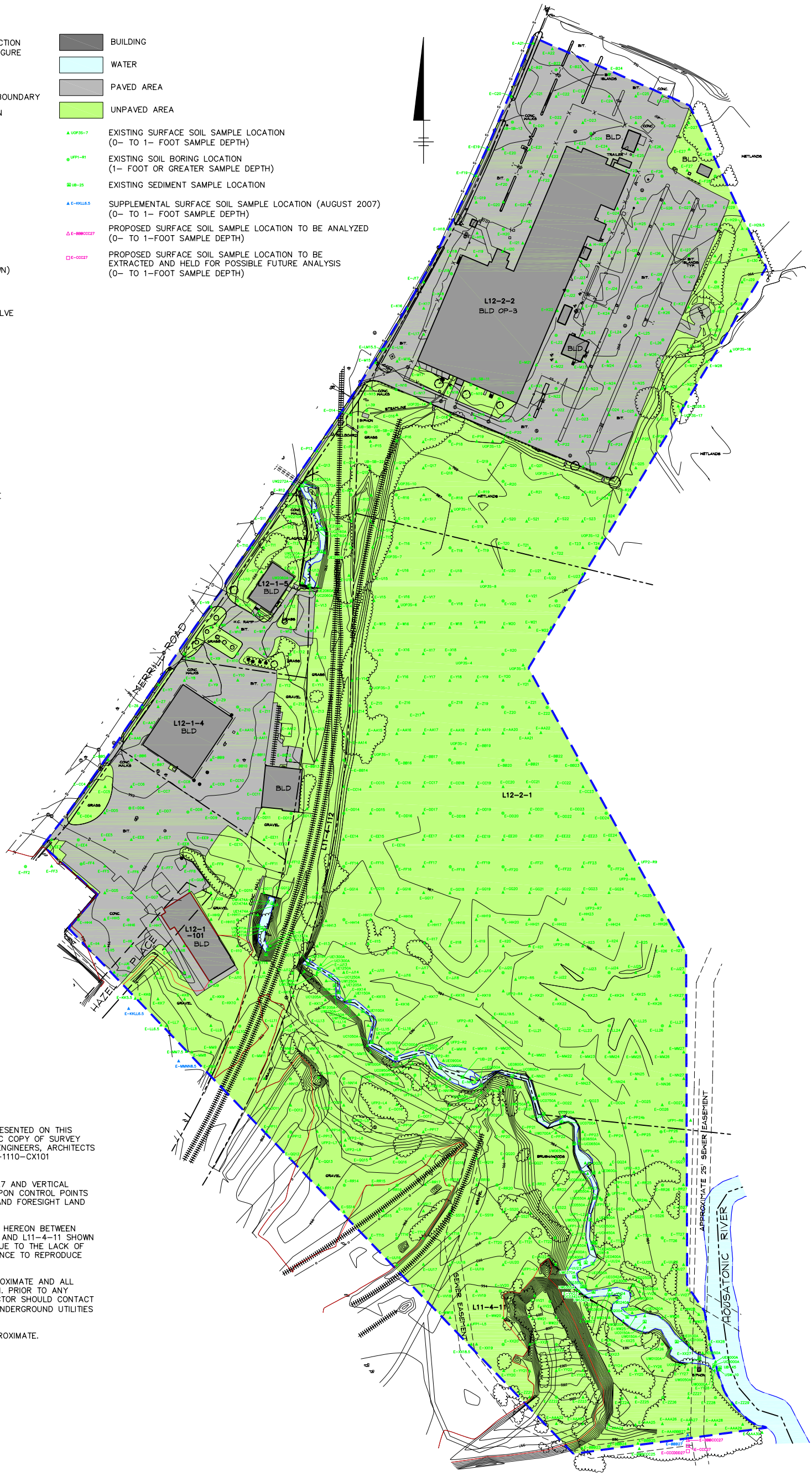
[SYR-85-DMW] SYR-85-DMW LAF DMW LAYER: ON=*, OFF=*REF*
G:\CAD\GE-CAD\GE_ACTIVE\N\40190027\SUPP\PCB\40190G02.DWG SAVED: 10/3/2007 1:32 PM LAYOUT: 1 PAGESETUP: ---- PENTABLE: PLTFULL.CTB PRINTED: 10/3/2007 3:07 PM BY: DWODARCZYK

PROJECTNAME: ----
XREFS: IMAGES:
40190X12

LEGEND:

- PORTION OF REMOVAL ACTION AREA SHOWN ON THIS FIGURE
- PROPERTY LINE
- EASEMENT
- 100-YEAR FLOODPLAIN BOUNDARY
- L12-2-1 PROPERTY IDENTIFICATION
- BOLLARD
- SIGN
- LIGHT POLE
- UTILITY POLE
- CATCH BASIN
- CATCH BASIN - ROUND
- DRAIN MANHOLE
- SANITARY MANHOLE
- TELEPHONE MANHOLE
- ELECTRIC MANHOLE
- MANHOLE (TYPE UNKNOWN)
- WATER SHUT-OFF/GATE
- HYDRANT
- PRESSURE INDICATOR VALVE
- EDGE OF WATER
- METAL FENCE
- CHAIN LINK FENCE
- RAILROAD TRACKS
- GUARDRAIL
- ELECTRIC SERVICE
- GAS SERVICE
- WATER SERVICE
- SANITARY SEWER
- STORM DRAIN
- EXISTING CONTOUR
- EDGE OF BUSHES/HEDGE
- DECIDUOUS TREE

- BUILDING
- WATER
- PAVED AREA
- UNPAVED AREA
- EXISTING SURFACE SOIL SAMPLE LOCATION (0- TO 1- FOOT SAMPLE DEPTH)
- EXISTING SOIL BORING LOCATION (1- FOOT OR GREATER SAMPLE DEPTH)
- EXISTING SEDIMENT SAMPLE LOCATION
- SUPPLEMENTAL SURFACE SOIL SAMPLE LOCATION (AUGUST 2007) (0- TO 1- FOOT SAMPLE DEPTH)
- PROPOSED SURFACE SOIL SAMPLE LOCATION TO BE ANALYZED (0- TO 1-FOOT SAMPLE DEPTH)
- PROPOSED SURFACE SOIL SAMPLE LOCATION TO BE EXTRACTED AND HELD FOR POSSIBLE FUTURE ANALYSIS (0- TO 1-FOOT SAMPLE DEPTH)



NOTES:

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE ARE FROM ELECTRONIC COPY OF SURVEY DRAWING PROVIDED BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, FILE NO. GE-1110-CX101 (6/21/07).
2. HORIZONTAL DATUM IS NAD 27 AND VERTICAL DATUM IS NGVD 29 BASED UPON CONTROL POINTS PROVIDED BY ARCADIS-BBL AND FORESIGHT LAND SERVICES.
3. THE BOUNDARY LINES SHOWN HEREON BETWEEN PARCELS L12-2-2, L12-2-1 AND L11-4-11 SHOWN HEREON ARE APPROXIMATE DUE TO THE LACK OF PHYSICAL AND RECORD EVIDENCE TO REPRODUCE THEM.
4. UTILITY LOCATIONS ARE APPROXIMATE AND ALL UTILITIES MAY NOT BE SHOWN. PRIOR TO ANY CONSTRUCTION, THE CONTRACTOR SHOULD CONTACT "DIG-SAFE" AND HAVE ALL UNDERGROUND UTILITIES MARKED ON THE GROUND.
5. SAMPLE LOCATIONS ARE APPROXIMATE.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

PROPOSAL FOR ADDITIONAL SUPPLEMENTAL PCB PRE-DESIGN INVESTIGATIONS

FORMER EAST AREA - PCB CHARACTERIZATION LOCATIONS

ARCADIS BBL
Infrastructure, environment, facilities

FIGURE
1