



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Delivery

December 3, 2008

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)
Fourth Supplement to the Pre-Design Investigation Report for Unkamet Brook Area
Removal Action**

Dear Ms. Svirsky:

On July 29 and September 12, 2008, the General Electric Company (GE) submitted documents to the United States Environmental Protection Agency (EPA) titled *Third Supplement to the Pre-Design Investigation Report for Unkamet Brook Area Removal Action* (Third Supplement) and *Scope of Supplemental Investigations and Status Update* (Scope and Status Update), respectively. EPA conditionally approved those documents in a letter to GE dated November 4, 2008. That conditional approval letter required GE to prepare and submit within 30 days of the letter date (i.e., by December 4, 2008) figures depicting the utility corridors or portions of utility corridors to be used for calculating spatial average PCB concentrations during upcoming Removal Design/Removal Action (RD/RA) evaluations for the former North and East Areas as part of the Conceptual RD/RA Work Plans for either Unkamet Brook Area-West or Unkamet Brook Area-Remainder, as applicable.

Accordingly, GE has prepared this *Fourth Supplement to the Pre-Design Investigation Report for Unkamet Brook Area Removal Action* (Fourth Supplement) in response to the above-referenced conditional approval letter.

A. Utility Corridors Located in the Former North Area

As indicated in the November 4, 2008 conditional approval letter, GE has agreed to evaluate the soils within the sanitary sewer utility corridor in the former North Area located along Unkamet Brook and running approximately north to southeast, as two separate utility corridors in the Conceptual RD/RA Work Plan for Unkamet Brook Area-Remainder. The first corridor (labeled "Unkamet Brook Area-Remainder Utility Corridor #1" on attached Figure 1) will encompass the soils within the corridor located north of the former interior landfill and the second corridor (labeled "Unkamet Brook Area-Remainder Utility Corridor #2" on Figure 1) will encompass the soils within the corridor located to the south of the former interior landfill.

Additionally, GE has agreed to evaluate the soils within the utility corridors in the former North Area running west to east along Buildings 51, 105, 106 and 118, and in the vicinity of Buildings 125, 121 and 120k, as two separate corridors as part of the Conceptual RD/RA Work Plan for Unkamet Brook Area-West. The first corridor (labeled "Unkamet Brook Area-West Utility Corridor #1" on Figure 1) will encompass the soils within the utility corridor associated with the utilities servicing Buildings 105, 106, and 118, and running from the western edge of the corridor along Building 51 to the point slightly west of sample location 60G-02. The second corridor (labeled "Unkamet Brook Area - West Utility Corridor #2" on Figure 1) will encompass the soils within the remaining portion of the corridor associated with the utilities servicing Buildings 125, 121, and 120K.

In accordance with the *Statement of Work for Removal Actions Outside the River (SOW)*, and as noted on Figure 1, these utility corridors will be evaluated within the 1- to 6-foot depth increment.

B. Utility Corridors Located in the Former East Area

In the Conceptual RD/RA Work Plan for Unkamet Brook Area-Remainder, GE will evaluate the soils within the storm drain utility corridor that enters the northernmost portion of Parcel L12-1-5 from Merrill Road (labeled "Unkamet Brook Area-Remainder Utility Corridor #3" on attached Figure 2). In accordance with the SOW, the evaluation for utilities within non-GE-owned properties will include soils present in the utility corridor that may need to be removed during an emergency repair. Using City of Pittsfield utility drawings, GE determined the maximum depth of utility bedding to be approximately 7 feet. Therefore, this utility will be evaluated within the 0- to 7-foot depth increment.

Additionally, in the Conceptual RD/RA Work Plan for Unkamet Brook Area-Remainder, GE will evaluate the soils within the utility corridor of the gas line servicing the building on Parcel L12-1-5 (labeled "Unkamet Brook Area-Remainder Utility Corridor #4" on Figure 2) as a separate utility corridor using PCB results from sample location RAA10-E-V10. In accordance with the procedures outlined in the SOW, this utility will be evaluated within the 0- to 4-foot depth increment. It should be noted, based on conversations with Berkshire Gas Company (Berkshire Gas), that this line has been inactive since 2007 and is currently disconnected from the main service line. Berkshire Gas did indicate, however, that this line may be reactivated/reinstalled in the future. As a conservative measure, GE has elected to evaluate this line as indicated above. GE will also separately evaluate the soils within the sanitary sewer utility corridor running from west to east and abutting the gas line utility corridor. This utility corridor (labeled as "Unkamet Brook Area-Remainder Utility Corridor #5" on Figure 2) will be evaluated within the 0- to 10-foot depth increment. The evaluation will include three PCB samples (i.e., 1- to 3-foot, 3- to 6-foot, and 6- to 10-foot depth increments) from the proposed sample location UB-UTL-4, along with the PCB results from any remaining samples within the utility corridor, including sample location RAA10-E-V10.

GE will also evaluate the soils within the sanitary sewer utility corridor that generally runs from Merrill Road along Unkamet Brook as two separate utility corridors. The first corridor (labeled "Unkamet Brook Area-Remainder Utility Corridor #6" on Figure 2) will encompass the soils within the utility corridor for the portion of the sanitary sewer line primarily located within Parcel L11-4-112 and will be evaluated within the 0- to 12-foot depth increment. The second corridor (labeled "Unkamet Brook Area-Remainder Utility Corridor #7" on Figure 2) will encompass the soils within the utility corridor for the portion of the sanitary sewer line primarily located within Parcel L11-4-11 and will be evaluated within the 0- to 15-foot depth increment. As noted on

Figure 2, the evaluation for the soils within the second corridor (“Unkamet Brook Area–Remainder Utility Corridor #7”) may be adjusted if the future sampling results expand the boundaries of the Removal Action Area (RAA) to beyond the southern boundary (as depicted on Figure 2).

In addition, as discussed in the Scope and Status Update, GE has determined that it will extend the proposed soil boring RAA10-E-AAA22 (Figure 2) to a depth of 19 feet below ground surface (bgs) to account for a localized mound of fill that was placed following the development of City of Pittsfield utility drawings related to the sanitary sewer line located in the southernmost portion of Unkamet Brook Area-Remainder. For the utility corridor evaluations associated with this portion of “Unkamet Brook Area–Remainder Utility Corridor #7” sewer line, polygons associated with soil boring RAA10-E-AAA22 will extend to a depth of 19 feet bgs within the area labeled “Portion of Unkamet Brook Area-Remainder Utility Corridor #7 (to be evaluated within the 0- to 19-foot depth increment)” on Figure 2.

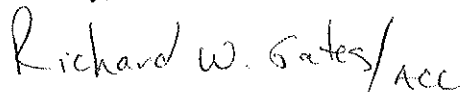
C. Schedule for Evaluating Utilities within the Former Interior Landfill

Condition No. 3 of EPA’s November 4, 2008 conditional approval letter requires GE to propose a schedule for the sampling and evaluation of the utility corridor surrounding any utility that will remain within the former interior landfill. As previously discussed with EPA, GE does not believe it is required by the Consent Decree or SOW to conduct sampling or conduct evaluations of soil within the former interior landfill because the SOW provides for a pre-determined remedy involving placement of an engineered barrier over that area and the SOW further provides that removal of soil in the area of the former interior landfill is not practicable. GE reserves its right to assert this position in the future.

Nevertheless, GE will address Condition No. 3 of EPA’s conditional approval letter as follows: Preliminary design information for the engineered barrier to be installed over the former interior landfill will be presented in the Conceptual RD/RA Work Plan for Unkamet Brook Area–Remainder (due to EPA on March 27, 2009). As a part of this discussion, GE will provide information regarding decommissioning/rerouting of utilities within the former interior landfill and/or sampling and evaluating any utility corridors that will remain within that area.

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

Sincerely,



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)
Michael Gorski, MDEP
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Nancy E. Harper, MA AG*
Dale Young, MA EOE*
Mayor James Ruberto, City of Pittsfield
Linda Palmieri, Weston (2 copies)
Michael Carroll, GE*
Rod McLaren, GE*
James Nuss, ARCADIS
James Bieke, Goodwin Procter LLP
Andrew Hogeland, SABIC

Steven Deloye, GE (CP/SO)
Dennis Arseneau, GE (CP/SO)
John Wood, SABIC*
Scott LeBeau, General Dynamics
Larry Salvatore, Massachusetts Department
of Highways
Bruce Collingwood, City of Pittsfield
Public Works
Scott Richards, Berkshire Community College
Kevin Boland, CSX Transportation
Nina Johnson, United States Navy
Property Owner – Parcel K11-7-8
Property Owner – Parcel L11-4-112
Property Owner – Parcel L12-1-2
Property Owner – Parcel L12-1-4
Property Owner – Parcel L12-1-5
Property Owner – Parcel L12-1-101
Public Information Repositories
GE Internal Repository

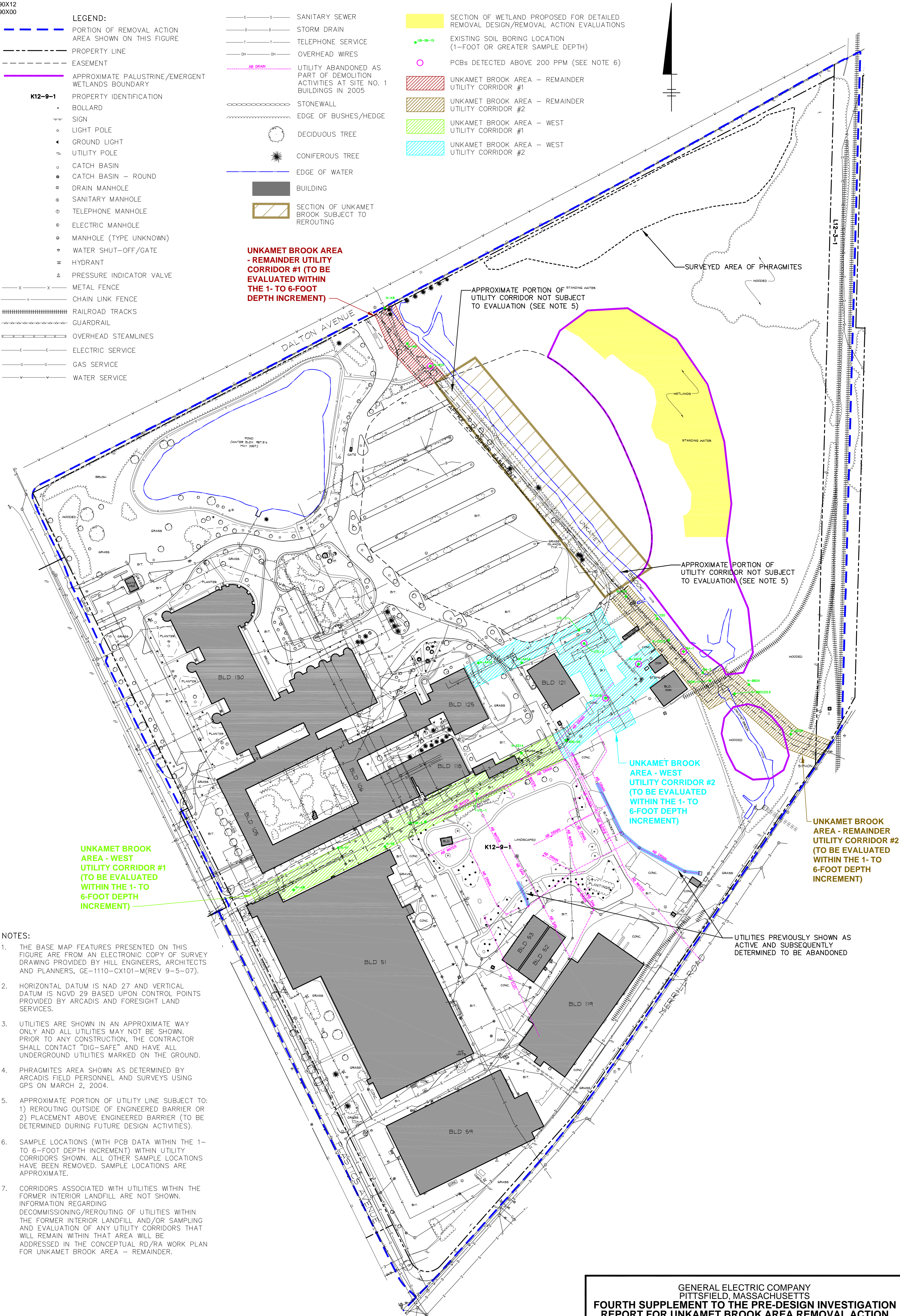
** cover letter only*

XREFS: IMAGES: PROJECTNAME: ----
 40190X12
 40190X00

- LEGEND:**
- PORTION OF REMOVAL ACTION AREA SHOWN ON THIS FIGURE
 - PROPERTY LINE
 - EASEMENT
 - APPROXIMATE PALUSTRINE/EMERGENT WETLANDS BOUNDARY
 - K12-9-1** PROPERTY IDENTIFICATION
 - BOLLARD
 - SIGN
 - LIGHT POLE
 - GROUND LIGHT
 - 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
 - METAL FENCE
 - CHAIN LINK FENCE
 - ===== RAILROAD TRACKS
 - GUARDRAIL
 - OVERHEAD STEAMLINES
 - ELECTRIC SERVICE
 - GAS SERVICE
 - WATER SERVICE

- SANITARY SEWER
- STORM DRAIN
- TELEPHONE SERVICE
- OVERHEAD WIRES
- UTILITY ABANDONED AS PART OF DEMOLITION ACTIVITIES AT SITE NO. 1 BUILDINGS IN 2005
- STONEWALL
- EDGE OF BUSHES/HEDGE
- DECIDUOUS TREE
- CONIFEROUS TREE
- EDGE OF WATER
- BUILDING
- SECTION OF UNKAMET BROOK SUBJECT TO REROUTING

- SECTION OF WETLAND PROPOSED FOR DETAILED REMOVAL DESIGN/REMOVAL ACTION EVALUATIONS
- EXISTING SOIL BORING LOCATION (1-FOOT OR GREATER SAMPLE DEPTH)
- PCBs DETECTED ABOVE 200 PPM (SEE NOTE 6)
- UNKAMET BROOK AREA - REMAINDER UTILITY CORRIDOR #1
- UNKAMET BROOK AREA - REMAINDER UTILITY CORRIDOR #2
- UNKAMET BROOK AREA - WEST UTILITY CORRIDOR #1
- UNKAMET BROOK AREA - WEST UTILITY CORRIDOR #2



UNKAMET BROOK AREA - REMAINDER UTILITY CORRIDOR #1 (TO BE EVALUATED WITHIN THE 1- TO 6-FOOT DEPTH INCREMENT)

APPROXIMATE PORTION OF UTILITY CORRIDOR NOT SUBJECT TO EVALUATION (SEE NOTE 5)

APPROXIMATE PORTION OF UTILITY CORRIDOR NOT SUBJECT TO EVALUATION (SEE NOTE 5)

UNKAMET BROOK AREA - WEST UTILITY CORRIDOR #2 (TO BE EVALUATED WITHIN THE 1- TO 6-FOOT DEPTH INCREMENT)

UNKAMET BROOK AREA - REMAINDER UTILITY CORRIDOR #2 (TO BE EVALUATED WITHIN THE 1- TO 6-FOOT DEPTH INCREMENT)

UNKAMET BROOK AREA - WEST UTILITY CORRIDOR #1 (TO BE EVALUATED WITHIN THE 1- TO 6-FOOT DEPTH INCREMENT)

- NOTES:**
1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE ARE FROM AN ELECTRONIC COPY OF SURVEY DRAWING PROVIDED BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, GE-1110-CX101-M (REV 9-5-07).
 2. HORIZONTAL DATUM IS NAD 27 AND VERTICAL DATUM IS NGVD 29 BASED UPON CONTROL POINTS PROVIDED BY ARCADIS AND FORESIGHT LAND SERVICES.
 3. UTILITIES ARE SHOWN IN AN APPROXIMATE WAY ONLY AND ALL UTILITIES MAY NOT BE SHOWN. PRIOR TO ANY CONSTRUCTION, THE CONTRACTOR SHALL CONTACT "DIG-SAFE" AND HAVE ALL UNDERGROUND UTILITIES MARKED ON THE GROUND.
 4. PHRAGMITES AREA SHOWN AS DETERMINED BY ARCADIS FIELD PERSONNEL AND SURVEYS USING GPS ON MARCH 2, 2004.
 5. APPROXIMATE PORTION OF UTILITY LINE SUBJECT TO: 1) REROUTING OUTSIDE OF ENGINEERED BARRIER OR 2) PLACEMENT ABOVE ENGINEERED BARRIER (TO BE DETERMINED DURING FUTURE DESIGN ACTIVITIES).
 6. SAMPLE LOCATIONS (WITH PCB DATA WITHIN THE 1- TO 6-FOOT DEPTH INCREMENT) WITHIN UTILITY CORRIDORS SHOWN. ALL OTHER SAMPLE LOCATIONS HAVE BEEN REMOVED. SAMPLE LOCATIONS ARE APPROXIMATE.
 7. CORRIDORS ASSOCIATED WITH UTILITIES WITHIN THE FORMER INTERIOR LANDFILL ARE NOT SHOWN. INFORMATION REGARDING DECOMMISSIONING/REROUTING OF UTILITIES WITHIN THE FORMER INTERIOR LANDFILL AND/OR SAMPLING AND EVALUATION OF ANY UTILITY CORRIDORS THAT WILL REMAIN WITHIN THAT AREA WILL BE ADDRESSED IN THE CONCEPTUAL RD/RA WORK PLAN FOR UNKAMET BROOK AREA - REMAINDER.

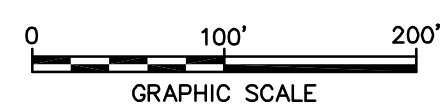
UTILITIES PREVIOUSLY SHOWN AS ACTIVE AND SUBSEQUENTLY DETERMINED TO BE ABANDONED

GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
FOURTH SUPPLEMENT TO THE PRE-DESIGN INVESTIGATION REPORT FOR UNKAMET BROOK AREA REMOVAL ACTION

SUMMARY OF UTILITY CORRIDORS SUBJECT TO EVALUATION WITHIN UNKAMET BROOK AREA - FORMER NORTH AREA



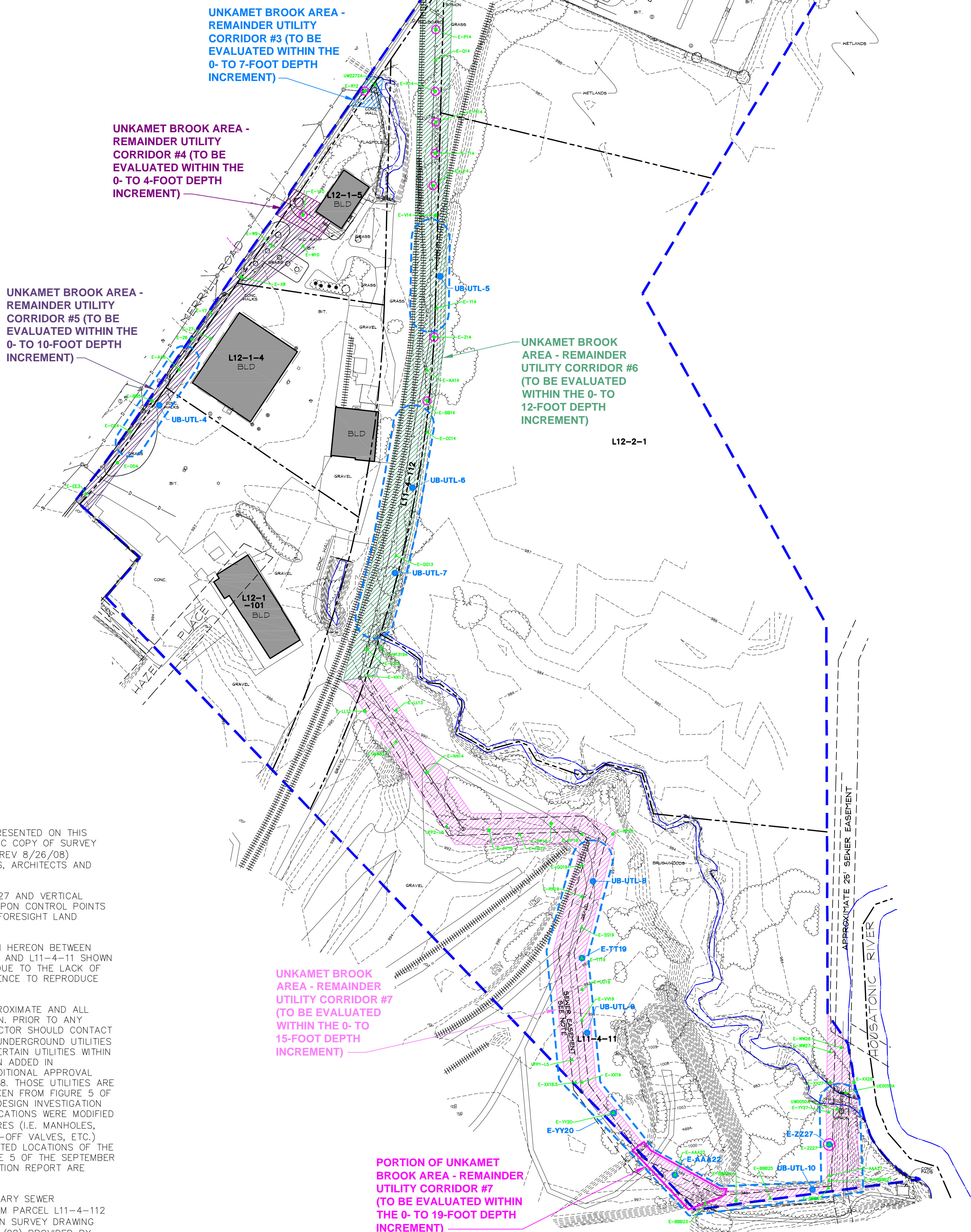
FIGURE
1



XREFS: IMAGES: PROJECTNAME: ----
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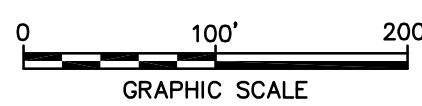
- LEGEND:**
- PORTION OF REMOVAL ACTION AREA SHOWN ON THIS FIGURE
 - PROPERTY LINE
 - EASEMENT
 - L12-2-1** PROPERTY IDENTIFICATION
 - BOLLARD
 - SIGN
 - LIGHT POLE
 - UTILITY POLE
 - CATCH BASIN
 - CATCH BASIN - ROUND
 - DRAIN MANHOLE
 - SANITARY MANHOLE
 - TELEPHONE MANHOLE
 - ELECTRIC MANHOLE
 - MANHOLE (TYPE UNKNOWN)
 - ⊥ WATER SHUT-OFF/GATE
 - ⊥ HYDRANT
 - ⊥ PIV PRESSURE INDICATOR VALVE
 - EDGE OF WATER
 - METAL FENCE
 - CHAIN LINK FENCE
 - ▬ RAILROAD TRACKS
 - ▬ GUARDRAIL
 - 1005 --- EXISTING CONTOUR
 - ELECTRIC SERVICE
 - GAS SERVICE
 - WATER SERVICE
 - SANITARY SEWER
 - STORM DRAIN
 - EDGE OF BUSHES/HEDGE
 - DECIDUOUS TREE

- BUILDING
- E-PP18 EXISTING SOIL BORING LOCATION (1-FOOT OR GREATER SAMPLE DEPTH)
- △ UOP35-7 EXISTING SURFACE SOIL SAMPLE LOCATION (0- TO 1-FOOT SAMPLE DEPTH)
- PCBs DETECTED ABOVE 200 PPM (SEE NOTE 6)
- APPROXIMATE SECTION OF UTILITY CORRIDOR WHERE ADDITIONAL PCB SAMPLING IS PROPOSED
- UB-UTL-4 PROPOSED SOIL BORING LOCATION TO SUPPORT FUTURE UTILITY EVALUATIONS
- ▨ UNKAMET BROOK AREA - REMAINDER UTILITY CORRIDOR #3
- ▨ UNKAMET BROOK AREA - REMAINDER UTILITY CORRIDOR #4
- ▨ UNKAMET BROOK AREA - REMAINDER UTILITY CORRIDOR #5
- ▨ UNKAMET BROOK AREA - REMAINDER UTILITY CORRIDOR #6
- ▨ UNKAMET BROOK AREA - REMAINDER UTILITY CORRIDOR #7



NOTES:

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE ARE FROM ELECTRONIC COPY OF SURVEY DRAWING GE-1110-CX101-M (REV 8/26/08) PROVIDED BY HILL ENGINEERS, ARCHITECTS AND PLANNERS.
2. HORIZONTAL DATUM IS NAD 27 AND VERTICAL DATUM IS NGVD 29 BASED UPON CONTROL POINTS PROVIDED BY ARCADIS 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. CERTAIN UTILITIES WITHIN PARCEL L12-2-2 HAVE BEEN ADDED IN ACCORDANCE WITH EPA CONDITIONAL APPROVAL LETTER DATED JUNE 30, 2008. THOSE UTILITIES ARE APPROXIMATE AND WERE TAKEN FROM FIGURE 5 OF THE SEPTEMBER 2005 PRE-DESIGN INVESTIGATION REPORT. SOME OF THESE LOCATIONS WERE MODIFIED BASED ON SURVEYED FEATURES (I.E. MANHOLES, CATCH BASINS, WATER SHUT-OFF VALVES, ETC.) THE PRESENCE AND ASSOCIATED LOCATIONS OF THE UTILITIES TAKEN FROM FIGURE 5 OF THE SEPTEMBER 2005 PRE-DESIGN INVESTIGATION REPORT ARE UNKNOWN.
5. SEWER EASEMENT AND SANITARY SEWER LINE/MANHOLES SHOWN (FROM PARCEL L11-4-112 ACROSS L11-4-11) BASED ON SURVEY DRAWING GE-1110-CX101-M (REV 8/26/08) PROVIDED BY HILL ENGINEERS, ARCHITECTS AND PLANNERS.
6. SAMPLE LOCATIONS (WITH PCB DATA WITHIN THE 0- TO 15-FOOT DEPTH INCREMENT) WITHIN UTILITY CORRIDORS SHOWN. ALL OTHER SAMPLE LOCATIONS HAVE BEEN REMOVED. SAMPLE LOCATIONS ARE APPROXIMATE.
7. BASED ON CONVERSATIONS WITH BERKSHIRE GAS COMPANY, UNKAMET BROOK AREA - REMAINDER UTILITY CORRIDOR #4 HAS BEEN INACTIVE SINCE 2007 AND IS CURRENTLY DISCONNECTED FROM THE MAIN SERVICE LINE. BERKSHIRE GAS COMPANY DID INDICATE, HOWEVER, THAT THIS LINE MAY BE REACTIVATED/REINSTALLED IN THE FUTURE. AS A CONSERVATIVE MEASURE, GE HAS ELECTED TO EVALUATE THIS LINE DURING UPCOMING RD/RA ACTIVITIES.



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**SUMMARY OF UTILITY CORRIDORS SUBJECT
 TO EVALUATION WITHIN UNKAMET BROOK
 AREA - FORMER EAST AREA**

