



GE Corporate

159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted via Electronic Mail and Overnight Delivery*

August 20, 2013

Mr. Dave Dickerson  
U.S. Environmental Protection Agency  
EPA New England (MC HBO)  
5 Post Office Square – Suite 100  
Boston, MA 02109-3912

**Re: GE-Pittsfield/Housatonic River Site  
Unkamet Brook Area (GECD170)  
Notification of Treatment of Phragmites**

Dear Mr. Dickerson:

On April 2, 2013, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a *Final Removal Design/Removal Action Work Plan for Unkamet Brook Area-Remainder*. In accordance with the requirements of the Consent Decree for this Site and subsequent communications with EPA, that work plan provided that GE will remove the large stands of phragmites (an invasive plant species) in the wetland areas east of Unkamet Brook and south of (and adjacent to) Dalton Avenue, located on property owned by GE. These areas are shown on the attached Figures 1-2 and 4-2. The work plan stated further that, prior to the removal of the phragmites, GE would treat the phragmites removal areas with herbicide, potentially on two occasions in the year prior to removal and on another occasion in the year of removal, to facilitate the removal and reduce the potential for dispersion during removal. Although the overall work plan is still under EPA review, EPA approved the phragmites treatment by e-mail on August 14, 2013.

This letter provides notification that the initial treatment of the phragmites areas will begin on or about August 30, 2013, and is anticipated to be completed by September 15, 2013, with any re-spraying or touch-up treatment completed by September 30, 2013. This initial treatment will consist of the application of the herbicide Rodeo, which is designed for use in this type of application. A Material Safety Data Sheet and other information for Rodeo are contained in Attachment 1. The herbicide will be applied from a vehicle operating within the wetland and/or from a vehicle operating on the shoulder of Dalton Avenue.

Please contact me if you have any questions about these activities.

Sincerely,



**Richard W. Gates**  
**Remediation Project Manager**

**Attachments**

- cc: Dean Tagliaferro, EPA**  
**Holly Inglis, EPA**  
**John Kilborn, EPA (w/o Attachment 1)**  
**Rose Howell, EPA (w/o Attachment 1)**  
**Robert Leitch, USACE (w/o Attachment 1)**  
**Linda Palmieri, Weston Solutions**  
**Michael Gorski, MDEP (w/o Attachment 1)**  
**John Ziegler, MDEP**  
**Mayor Daniel Bianchi, City of Pittsfield**  
**Bruce Collingwood, Commissioner of Public Works, City of Pittsfield**  
**Pittsfield Conservation Commission**  
**Pittsfield Board of Health**  
**Rod McLaren, GE**  
**Andrew Silber, GE**  
**James Bieke, Sidley Austin**  
**Corey Averill, ARCADIS**  
**Public Information Repositories**  
**GE Internal Repositories**

# Specimen Label



# Rodeo®

## Herbicide

For control of annual and perennial weeds and woody plants in forests, non-crop sites, and in and around aquatic sites; also for use in wildlife habitat areas, for perennial grass release, and grass growth suppression and grazed areas on these sites.

Avoid contact of herbicide with foliage, green stems, exposed non-woody roots or fruit of crops, desirable plants and trees, because severe injury or destruction may result.

Active Ingredient(s): glyphosate <sup>1</sup> N (phosphonmethyl)glycine, isopropylamine salt .....	53.8%
Other Ingredients .....	46.2%
Total Ingredients .....	100.0%

<sup>1</sup> Contains 5.4 pounds per gallon glyphosate, isopropylamine salt (4 pounds per gallon glyphosate acid).

EPA Reg. No. 62719-324

Keep Out of Reach of Children

## CAUTION PRECAUCION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

### Precautionary Statements

#### Hazards to Humans and Domestic Animals

#### Harmful If Inhaled

Avoid breathing spray mist. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling.

### Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE (Personal Protective Equipment). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### Engineering Controls

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240 (d) (4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

### User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

### First Aid

If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact: 1-800-952-5964 for emergency medical treatment information.

### Environmental Hazards

Do not contaminate water when cleaning equipment or disposing of equipment washwaters. Treatment of aquatic weeds can result in oxygen depletion or loss due to decomposition of dead plants. This oxygen loss can cause fish suffocation.

In case of leak or spill, soak up and remove to a landfill.

### Physical or Chemical Hazards

Spray solutions of this product should be mixed, stored and applied using only stainless steel, aluminum, fiberglass, plastic or plastic-lined steel containers.

Do not mix, store or apply this product or spray solutions of this product in galvanized steel or unlined steel (except stainless steel) containers or spray tanks. This product or spray solutions of this product react with such containers and tanks to produce hydrogen gas, which may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lit cigarette or other ignition source.

Notice: Read the entire label. Use only according to label directions. Before using this product, read Terms and Conditions of Use, Warranty Disclaimer, Inherent Risks of Use, and Limitation of Remedies elsewhere on this label. If terms are unacceptable, return at once unopened.

# MATERIAL SAFETY DATA SHEET



## RODEO\* HERBICIDE

Emergency Phone: 800-992-5994  
Dow AgroSciences LLC  
Indianapolis, IN 46268

Effective Date: 3/23/04  
Product Code: 84825  
MSDS: 006694

### 1. PRODUCT AND COMPANY IDENTIFICATION:

**PRODUCT:** Rodeo\* Herbicide

#### COMPANY IDENTIFICATION:

Dow AgroSciences LLC  
9330 Zioneville Road  
Indianapolis, IN 46268-1189

### 2. COMPOSITION/INFORMATION ON INGREDIENTS:

Glyphosate IPA, N-(phosphono-methyl) glycine, Isopropylamine Salt	CAS # 038641-94-0	53.8%
Balance, Total		46.2%

### 3. HAZARDOUS IDENTIFICATIONS:

#### EMERGENCY OVERVIEW

Clear, pale yellow liquid. May cause eye irritation. Slightly toxic to aquatic organisms.

**EMERGENCY PHONE NUMBER:** 800-992-5994

### 4. FIRST AID:

**EYE:** Flush eyes thoroughly with water for several minutes. Remove contact lenses after initial 1-2 minutes and continue flushing for several additional minutes. If effects occur, consult a physician, preferably an ophthalmologist.

**SKIN:** Wash skin with plenty of water.

**INGESTION:** No emergency medical treatment necessary.

**INHALATION:** Remove person to fresh air; if effects occur, consult a physician.

**NOTE TO PHYSICIAN:** No specific antidote. Treatment of exposure should be directed at the control of symptoms and the clinical condition of the patient.

### 5. FIRE FIGHTING MEASURES:

**FLASH POINT:** >214°F (>101°C)  
**METHOD USED:** Setaflash

#### FLAMMABLE LIMITS:

LFL: Not applicable  
UFL: Not applicable

**EXTINGUISHING MEDIA:** Foam, CO<sub>2</sub>, Dry Chemical

**FIRE AND EXPLOSION HAZARDS:** Foam fire extinguishing system is preferred because uncontrolled water can spread possible contamination. Toxic irritating gases may be formed under fire conditions.

**FIRE-FIGHTING EQUIPMENT:** Use positive-pressure, self-contained breathing apparatus and full protective equipment.

### 6. ACCIDENTAL RELEASE MEASURES:

**ACTION TO TAKE FOR SPILLS:** Absorb small spills with an inert absorbent material such as Hazorb, Zorbull, sand, or dirt. Report large spills to Dow AgroSciences on 800-992-5994.

### 7. HANDLING AND STORAGE:

**PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:** Keep out of reach of children. Do not swallow. Avoid contact with eyes, skin, and clothing. Avoid breathing vapors and spray mist. Handle concentrate in ventilated area. Wash thoroughly with soap and water after handling and before eating, chewing gum, using tobacco, using the toilet or smoking. Keep away from food, feedstuffs, and water supplies. Store in original container with the lid tightly closed. Store above 10°F (-12°C) to keep from crystallizing.

### 8. EXPOSURE CONTROLS/PERSONAL PROTECTION:

These precautions are suggested for conditions where the potential for exposure exists. Emergency conditions may require additional precautions.

**EXPOSURE GUIDELINES:** None established

**ENGINEERING CONTROLS:** Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary for some operations.

**RECOMMENDATIONS FOR MANUFACTURING, COMMERCIAL BLENDING, AND PACKAGING WORKERS:**

**EYE/FACE PROTECTION:** Use safety glasses.

**SKIN PROTECTION:** No precautions other than clean body-covering clothing should be needed.

# MATERIAL SAFETY DATA SHEET



Emergency Phone: 800-992-5994  
Dow AgroSciences LLC  
Indianapolis, IN 46268

Effective Date: 3/23/04  
Product Code: 84825  
MSDS: 006694

## RODEO\* HERBICIDE

**RESPIRATORY PROTECTION:** For most conditions, no respiratory protection should be needed; however, if discomfort is experienced, use a NIOSH approved air-purifying respirator.

**APPLICATIONS AND ALL OTHER HANDLERS:** Please refer to the product label for personal protective clothing and equipment.

### 9. PHYSICAL AND CHEMICAL PROPERTIES:

**APPEARANCE:** Clear, pale yellow liquid  
**DENSITY:** 10.0 - 10.5 lbs/gal  
**pH:** 4.8 - 5.0  
**ODOR:** None  
**SOLUBILITY IN WATER:** Miscible  
**SPECIFIC GRAVITY:** 1.21 gm/L  
**FREEZING POINT:** -7°F - -10°F (-21°C - -25°C)

### 10. STABILITY AND REACTIVITY:

**STABILITY: (CONDITIONS TO AVOID)** Stable under normal storage conditions.

**INCOMPATIBILITY: (SPECIFIC MATERIALS TO AVOID)** Galvanized or unlined steel (except stainless steel) containers or spray tanks may produce hydrogen gas which may form a highly combustible gas mixture.

**HAZARDOUS DECOMPOSITION PRODUCTS:** None known.

**HAZARDOUS POLYMERIZATION:** Not known to occur

### 11. TOXICOLOGICAL INFORMATION:

**EYE:** May cause slight temporary eye irritation. Corneal injury is unlikely.

**SKIN:** Essentially non-irritating to skin. Prolonged skin contact is unlikely to result in absorption of harmful amounts. The LD<sub>50</sub> for skin absorption in rabbits is >5000 mg/kg. Did not cause allergic skin reactions when tested in guinea pigs.

**INGESTION:** Very low toxicity if swallowed. Harmful effects not anticipated from swallowing small amounts. The oral LD<sub>50</sub> for rats is >5000 mg/kg.

**INHALATION:** Brief exposure (minutes) is not likely to cause adverse effects. The aerosol LC<sub>50</sub> for rats is >6.37 mg/L for 4 hours.

**SYSTEMIC (OTHER TARGET ORGAN) EFFECTS:** For a similar material, glyphosate, in animals, effects have been reported on the following organ: liver.

**CANCER INFORMATION:** A similar material, glyphosate, did not cause cancer in laboratory animals.

**TERATOLOGY (BIRTH DEFECTS):** For glyphosate IPA, available data are inadequate for evaluation of potential to cause birth defects.

**REPRODUCTIVE EFFECTS:** For glyphosate IPA, available data are inadequate to determine effects on reproduction.

**MUTAGENICITY:** For a similar material, glyphosate, in-vitro and animal genetic toxicity studies were negative.

### 12. ECOLOGICAL INFORMATION:

#### ENVIRONMENTAL DATA:

#### ECOTOXICOLOGY:

Material is practically non-toxic to aquatic organisms on an acute basis (LC<sub>50</sub> or EC<sub>50</sub> is >100 mg/L in most sensitive species tested)

Acute LC<sub>50</sub> for rainbow trout (*Oncorhynchus mykiss*) is >2500 mg/L

Acute immobilization EC<sub>50</sub> in water flea (*Daphnia magna*) is 918 mg/L.

Material is practically non-toxic to birds on an acute basis (LD<sub>50</sub> is >2000 mg/kg)

Acute oral LD<sub>50</sub> in bobwhite (*Colinus virginianus*) is >2000 mg/kg.

The LC<sub>50</sub> in earthworm *Eisenia foetida* is >1000 mg/kg.

Acute contact LD<sub>50</sub> in honey bee (*Apis mellifera*) is >100 µg/bee.

Acute oral LD<sub>50</sub> in honey bee (*Apis mellifera*) is >100 µg/bee.

Growth inhibition EC<sub>50</sub> in green alga (*Salinastrum capricornutum*) is 127 mg/L.

Growth inhibition EC<sub>50</sub> in duckweed (*Lemna sp.*) is 24.4 mg/L.

### 13. DISPOSAL CONSIDERATIONS:

**DISPOSAL METHOD:** If wastes and/or containers cannot be disposed of according to the product label directions, disposal of this material must be in accordance with your local or area regulatory authorities.

# MATERIAL SAFETY DATA SHEET



Emergency Phone: 800-992-5994  
Dow AgroSciences LLC  
Indianapolis, IN 46268

## RODEO\* HERBICIDE

Effective Date: 3/23/04  
Product Code: 84825  
MSDS: 006694

This information presented below only applies to the material as supplied. The identification based on characteristic(s) or listing may not apply if the material has been used or otherwise contaminated. It is the responsibility of the waste generator to determine the toxicity and physical properties of the material generated to determine the proper waste identification and disposal methods in compliance with applicable regulations.

If the material as supplied becomes a waste, follow all applicable regional, national and local laws and regulations.

### 14. TRANSPORT INFORMATION:

#### U.S. DEPARTMENT OF TRANSPORTATION (DOT) INFORMATION:

For all package sizes and modes of transportation:  
This material is not regulated for transport.

### 15. REGULATORY INFORMATION:

**NOTICE:** The information herein is presented in good faith and believed to be accurate as of the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numerous federal, state or provincial, and local laws and regulations.

#### U.S. REGULATIONS

**SARA 313 INFORMATION.** To the best of our knowledge, this product contains no chemical subject to SARA Title III Section 313 supplier notification requirements.

**SARA HAZARD CATEGORY:** This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

Not to have met any hazard category

**TOXIC SUBSTANCES CONTROL ACT (TSCA):** All ingredients are on the TSCA inventory or are not required to be listed on the TSCA inventory.

**STATE RIGHT-TO-KNOW:** This product is not known to contain any substances subject to the disclosure requirements of

New Jersey  
Pennsylvania

**OSHA HAZARD COMMUNICATION STANDARD:** This product is a "Hazardous Chemical" as defined by the OSHA Hazard Communication Standard, 29 CFR 1910.1200.

**COMPREHENSIVE ENVIRONMENTAL RESPONSE COMPENSATION AND LIABILITY ACT (CERCLA, or SUPERFUND):** To the best of our knowledge, this product contains no chemical subject to reporting under CERCLA.

**NATIONAL FIRE PROTECTION ASSOCIATION (NFPA) RATINGS:**

CATEGORY	RATING
Health	1
Flammability	1
Reactivity	0

### 16. OTHER INFORMATION:

**MSDS STATUS.** Revised Sections: 3, 4, 11, 12, 13, 14 & 15  
Reference: DR-0361-8028  
Replaces MSDS Dated: 1/12/00  
Document Code: D03-148-002  
Replaces Document Code: D03-148-001

The Information Herein Is Given In Good Faith, But No Warranty, Express Or Implied, Is Made. Consult Dow AgroSciences For Further Information.









**LEGEND:**

	UNKAMET BROOK AREA - REMAINDER PORTION OF REMOVAL ACTION AREA
	APPROXIMATE PROPERTY LINE
	PROPERTY IDENTIFICATION
	EDGE OF WATER
	METAL FENCE
	CHAIN LINK FENCE
	RAILROAD TRACKS
	GUARDRAIL
	LANDFILL
	EDGE OF BUSHES/HEDGE
	DECIDUOUS TREE
	CONIFEROUS TREE
	1-FOOT SOIL/SEDIMENT REMOVAL (OUTSIDE BROOK)
	2-FOOT SOIL/SEDIMENT REMOVAL (OUTSIDE BROOK)
	1-FOOT BROOK SEDIMENT REMOVAL
	REMOVAL REQUIRED TO FACILITATE BROOK RE-ROUTING
	AREA PROPOSED FOR PLACEMENT OF AN ASPHALT ENGINEERED BARRIER
	AREA PROPOSED FOR PLACEMENT OF A VEGETATIVE ENGINEERED LANDFILL CAP
	SECTION OF UNKAMET BROOK SUBJECT TO REROUTING
	PROPOSED RE-ROUTED UNKAMET BROOK ALIGNMENT

**NOTES:**

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE ARE FROM ELECTRONIC COPY OF SURVEY DRAWINGS CE-1110-006-CX101-M(REV 12-2-08) AND GW-1110-009-CX101-M(REV 1-8-09) PROVIDED BY HILL ENGINEERS, ARCHITECTS AND PLANNERS.
2. HORIZONTAL DATUM IS NAD 27 AND VERTICAL DATUM IS NAVD 83. ALL SURVEY 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. SAMPLE LOCATIONS ARE APPROXIMATE.

GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**FINAL RD/RA WORK PLAN FOR  
 UNKAMET BROOK AREA-REMAINDER**  
**LIMITS OF SOIL REMOVAL/ENGINEERED  
 BARRIER INSTALLATION  
 (PROPERTIES NORTH OF MERRILL ROAD)**