

REPORT

*Removal Design/Removal Action
Work Plan for the Group 3C and 3D
Floodplain Properties*

Volume I of III

**General Electric Company
Pittsfield, Massachusetts**

June 2005

BBL[®]
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists



GE
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Transmitted Via Overnight Delivery

June 14, 2005

Mr. William P. Lovely, Jr.
United States Environmental Protection Agency
EPA New England (MC HBO)
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

**Re: Floodplain GE-Pittsfield/Housatonic River Site
Floodplain Residential and Non-Residential Properties Adjacent to 1½ Mile Reach of
Housatonic River (GECD710 and GECD720)
Removal Design/Removal Action Work Plan for the Group 3C and 3D Floodplain Properties**

Dear Mr. Lovely:

Enclosed for your review is GE's *Removal Design/Removal Action Work Plan for the Group 3C and 3D Floodplain Properties*.

Please call Dick Gates if you have any questions about this report.

Sincerely,

Andrew T. Silfer, P.E.
GE Project Coordinator

Enclosures

Y:\GE_Housatonic_Mile_and_Half\Reports and Presentations\RDRA WP for 3C & 3D\3655CvrLtr.doc

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1. Introduction

1.1 General

On October 27, 2000, a Consent Decree (CD) executed in 1999 by the General Electric Company (GE), the United States Environmental Protection Agency (EPA), the Massachusetts Department of Environmental Protection (MDEP), and several other government agencies was entered by the United States District Court for the District of Massachusetts. The CD requires (among other things) the performance of Removal Actions to address polychlorinated biphenyls (PCBs) and other hazardous constituents present in soil, sediment, and groundwater at several Removal Action Areas (RAAs) located in or near Pittsfield, Massachusetts. These RAAs are part of the GE-Pittsfield/Housatonic River Site (the Site). For each Removal Action, the CD and accompanying *Statement of Work for Removal Actions Outside the River* (SOW) (Appendix E to the CD) establish Performance Standards that must be achieved, as well as specific work plans and other documents that must be prepared to support the response actions for each RAA.

Two of these RAAs encompass properties located in whole or in part within the floodplain of the Housatonic River adjacent to the 1½ Mile Reach of the River: (1) Floodplain Current Residential Properties Adjacent to the 1½ Mile Reach – Actual/Potential Lawns; and (2) Floodplain Non-Residential Properties Adjacent to the 1½ Mile Reach (Excluding Banks). These RAAs are jointly referred to as the 1½ Mile Floodplain RAAs, and have been divided into four phases for investigation, evaluation, and remediation purposes to facilitate coordination with the remediation actions being conducted separately by EPA for sediments and riverbank soils in this same reach of the river. These phases are:

Phase 1 - Lyman Street Bridge to Elm Street Bridge;

Phase 2 - Elm Street Bridge to Dawes Avenue;

Phase 3 - Dawes Avenue to Pomeroy Avenue; and

Phase 4 - Pomeroy Avenue to the Confluence.

A Removal Design/Removal Action Work Plan for two groups of floodplain properties within Phase 3 of the 1½ Mile Floodplain RAAs – Groups 3A and 3B – was submitted to EPA on April 14, 2005, and conditionally approved by EPA by letter dated May 26, 2005. The present *Removal Design/Removal Action Work Plan for the Group 3C and 3D Floodplain Properties* (RD/RA Work Plan) addresses the two remaining groups of properties in Phase 3 of the 1½ Mile Floodplain RAAs – Groups 3C and 3D, which are shown on Figures 1-1

(general location) and 1-2 (more specific site plan). These properties are all residential, and the portions covered by this RD/RA Work Plan consist of the Actual/Potential Lawns (as defined in the CD) of the properties, which exclude the riverbanks. The sediments within the Housatonic River in this area and the adjacent riverbank soils are being addressed by EPA as part of the 1½ Mile Reach Removal Action.

The Group 3C and 3D floodplain properties have been sampled by both GE and EPA for PCBs and other constituents listed in Appendix IX of 40 CFR Part 264, plus three additional constituents – benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine (Appendix IX+3). The results from these investigations were presented in a *Proposal for Supplemental PCB Pre-Design Investigations* (Supplemental PCB Sampling Proposal) (August 3, 2004), an *Interim Pre-Design Investigation Report for Phase 3 Floodplain Properties, Groups 3A, 3B, 3C, and 3D* (Interim PDI Report) (August 13, 2004), an *Interim Pre-Design Investigation Report Addendum for Phase 3 Floodplain Properties, Groups 3A, 3B, 3C, and 3D* (Interim PDI Report Addendum) (October 21, 2004), and a *Second Interim Pre-Design Investigation Report - Phase 3 Floodplain Properties, Groups 3C and 3D* (Second Interim PDI Report) (March 10, 2005), all of which have been approved by EPA.

Based on the data from those investigations, this RD/RA Work Plan presents the results of GE's evaluation of the need for and scope of soil remediation to achieve the applicable Performance Standards under the CD and SOW for PCBs and other Appendix IX+3 constituents in soil. In addition, at properties where remediation is necessary, this Work Plan presents GE's proposed remediation, as well as an evaluation of PCBs and other Appendix IX+3 constituents in soil under post-remediation conditions to demonstrate that the proposed remediation will achieve the applicable Performance Standards under the CD and SOW. This Work Plan also provides technical design information regarding remediation, an implementation plan, details regarding post-construction activities, and an implementation schedule.

1.2 Description of Phase 3, Group 3C and 3D Floodplain Properties

The Phase 3, Group 3C and 3D floodplain properties include 8 residential properties where all or a portion of the Actual/Potential Lawn is located within the floodplain of the Housatonic River. All of the properties within Group 3C and 3D were identified on Figure 2-8 of the SOW.

The Group 3C floodplain properties are primarily bounded to the east by the riverbank of the East Branch of the Housatonic River, to the southwest by Pomeroy Avenue and to the northwest by other residential properties. The Group 3C floodplain properties consist of the following parcels (Figure 1-2):

- I7-2-1;
- I7-2-2;
- I7-2-3;
- I7-2-4; and
- I7-2-20.

The Group 3D floodplain properties are primarily bounded to the east by Appleton Avenue and High Street, to the north by Parcel I7-3-3, to the south by Pomeroy Avenue, and to the west by the riverbank of the East Branch of the Housatonic River. The Group 3D floodplain properties consist of the following parcels (Figure 1-2):

- I7-3-1;
- I7-3-2; and
- I7-99-000.

With the exception of Parcels I7-3-1 and I7-99-000, each of the above-listed properties represents a single evaluation area. Pursuant to discussions with EPA, GE agreed to develop two evaluation areas for each of Parcels I7-3-1 and I7-99-000 (i.e., separate “Front” and “Back” evaluation areas). However, as proposed in the Second Interim PDI Report and approved by EPA, the evaluation area for the front (eastern portion) of Parcel I7-99-000 is not subject to RD/RA evaluations because PCBs were not detected at concentrations above 1 ppm in any sample collected in that area.

Finally, for the properties located adjacent to the Housatonic River (all of the properties except Parcels I7-2-2, I7-2-3, and I7-2-4), only the non-riverbank portions of the properties are included in the Group 3C and 3D floodplain properties. As mentioned above, riverbank portions of these properties will be addressed by EPA through the 1½ Mile Reach Removal Action.

1.3 Scope and Format of RD/RA Work Plan

The remainder of this RD/RA Work Plan is presented in nine sections. The title and a brief overview of each section are presented below:

Section 2 – Summary of Pre-Design Activities and Available Soil Data, provides a brief summary of the pre-design investigations and other activities conducted by GE at the Group 3C and 3D floodplain properties, and presents the data used to evaluate the need for remediation to address PCBs and, where applicable, other Appendix IX+3 constituents in soil.

Section 3 – Summary of PCB and Appendix IX+3 Evaluation Procedures, provides an overview of the applicable PCB and Appendix IX+3 Performance Standards for the Group 3C and 3D floodplain properties, and describes the procedures used to evaluate PCBs and other Appendix IX+3 constituents (as applicable) in existing soil and, where necessary, post-remediation conditions.

Section 4 – PCB and Non-PCB Soil Evaluations for Group 3C Floodplain Properties, presents the results of the PCB and Appendix IX+3 evaluations (as applicable) for each evaluation area located within the Group 3C floodplain properties. This section first evaluates the soil data for PCBs and other Appendix IX+3 constituents under existing conditions at the Group 3C evaluation areas to determine the need for remedial actions to achieve the applicable Performance Standards. Where remediation is necessary, the proposed remedial actions to achieve the Performance Standards (i.e., soil removal/replacement) are then described and depicted on the attached Technical Drawings (Appendix A). Further, for evaluation areas where remediation is necessary to address PCBs and/or other constituents in soil, this section presents revised evaluations of anticipated post-remediation conditions for such constituents to demonstrate that the proposed remedial actions will achieve the applicable Performance Standards.

Section 5 – PCB and Non-PCB Soil Evaluations for Group 3D Floodplain Properties, presents the results of the PCB and Appendix IX+3 evaluations (as applicable) for each evaluation area located within the Group 3D floodplain properties. The information presented in this section for the Group 3D properties is similar to that provided in Section 4, but related to the Group 3D floodplain properties.

Section 6 – Design Information, describes additional design-related information associated with the remedial actions identified in Sections 4 and 5. Such information includes technical plans, specifications, and drawings;

information regarding performance of soil removal activities; an evaluation of potential impacts to the flood storage capacity in this area and the need for compensatory flood storage; identification of site-specific Applicable or Relevant and Appropriate Requirements (ARARs); and a description of the procedures to be implemented to ensure attainment of those ARARs.

Section 7 – Contractor Selection, discusses the process for selecting the Remedial Action Contractor.

Section 8 – Implementation Plan, discusses certain site-specific implementation components, including identification of the project participants, Contractor submittal requirements, project-specific site preparation and construction-related components, and the perimeter air monitoring activities proposed during the performance of the remedial actions.

Section 9 – Post-Construction Activities, identifies the various activities to be performed following implementation of the remedial actions, including project closeout activities (i.e., pre-certification inspection and preparation of a Final Completion Report) and Post-Removal Site Control activities.

Section 10 – Schedule, identifies the anticipated schedule for performance of the proposed remedial actions and the subsequent reporting activities.

The discussions in the sections listed above are supported by various figures and appendices included in this RD/RA Work Plan.

2. Summary of Pre-Design Activities and Available Soil Data

2.1 General

Prior to submittal of an RD/RA Work Plan for a given RAA, the CD and SOW require the characterization of soils within the RAA and collection of other relevant site information. These activities, collectively referred to as pre-design activities, serve as the basis for the subsequent technical RD/RA submittals. This section provides a summary of the pre-design activities that have been performed by GE at the Group 3C and 3D floodplain properties. These activities primarily involved the performance of soil sampling and analyses in accordance with the investigation requirements specified in the CD and SOW and were previously summarized in documents provided to EPA. In addition, to support the remedial evaluations presented herein, GE has performed a detailed site survey to identify surface elevations and topography, property boundaries and easements, certain utilities (e.g., manholes, catch basins), soil sample locations, and other site features.

2.2 Summary of Pre-Design Soil Investigations

GE proposed the scope of initial pre-design investigations for the Group 3C and 3D floodplain properties in its *Pre-Design Investigation Work Plan Addendum – Phase 3 Floodplain Properties, Groups 3A, 3B, 3C, and 3D* (Work Plan Addendum), dated January 8, 2004. This submittal was conditionally approved by EPA in a letter dated March 15, 2004. GE performed the pre-design activities described in the PDI Work Plan Addendum between March 29 and April 29, 2004, and reported the results in the August 3, 2004 Supplemental PCB Sampling Proposal and the August 13, 2004 Interim PDI Report. Those reports also proposed supplemental PCB and initial non-PCB investigations. The supplemental PCB investigations were conditionally approved by EPA in a letter dated August 12, 2004, and GE performed the supplemental PCB sampling between August 19 and August 24, 2004. The results of that investigation were summarized in the October 21, 2004 Interim PDI Report Addendum, which also included a proposal for additional PCB investigations and a revised proposal for non-PCB investigations. The proposed investigations specified in the Interim PDI Report Addendum were conditionally approved by EPA in a letter dated November 3, 2004, and were performed by GE between November 16 and December 9, 2004. The results of these investigations were presented in the March 10, 2005 Second Interim PDI Report, which indicated that the existing PCB and non-PCB data were sufficient to perform

the required RD/RA evaluations and no additional investigations at the Group 3C and 3D floodplain properties were warranted. EPA approved the Second PDI Report Addendum in a letter dated March 29, 2005.

These pre-design investigations involved the collection and analysis of a total of approximately 260 soil samples (excluding duplicates) for analysis of PCBs and approximately 65 soil samples (excluding duplicates) for other Appendix IX +3 constituents (excluding, with EPA's approval, volatile organic compounds [VOCs], pesticides, and herbicides). These sampling and analysis activities were conducted in accordance with GE's *Field Sampling Plan/Quality Assurance Project Plan* (FSP/QAPP).

2.3 Soil Sample Results for Work Plan

The locations of all soil samples within or adjacent to the Group 3C and 3D floodplain properties and used in this RD/RA Work Plan, including the usable historical and EPA soil samples, are shown on Figures 1-3 and 1-4 (for PCBs) and 2-1 and 2-2 (for non-PCB Appendix IX+3). The PCB analytical results for all samples used in the evaluations presented in this Work Plan (which are included in Appendix B) are shown on Figures 1-3 and 1-4. The non-PCB Appendix IX+3 analytical results for all samples used in the evaluations presented in this Work Plan are included in Appendix C.

3. Summary of PCB and Appendix IX+3 Evaluation Procedures

3.1 General

This section describes the Performance Standards specified in the CD and SOW for PCBs and other Appendix IX+3 constituents in soil at the Group 3C and 3D floodplain properties and the procedures used by GE to determine the need for and scope of remediation actions to achieve those Performance Standards.

3.2 Summary of PCB Evaluation Procedures

3.2.1 PCB-Related Performance Standards

For the Group 3C and 3D floodplain properties, the Performance Standards applicable to PCBs in soil are set forth in Paragraph 26 of the CD and Section 2.3.2 of the SOW. Those Performance Standards require that, for each evaluation area within these residential properties, GE must calculate spatial average PCB concentrations for the 0- to 1-foot and 1- to X-foot depth increments. Consistent with the EPA-approved Second Interim PDI Report, an X value has been determined for each evaluation area to include all or the majority of detected PCB concentrations in soil. The X depth for each evaluation area was specified in the EPA-approved Second Interim PDI Report. If the spatial average PCB concentration in the 0- to 1-foot or 1- to X-foot depth increment exceeds 2 ppm, GE must remove and replace soils as necessary to achieve a spatial average PCB concentration at or below 2 ppm in each depth increment. In addition, for any evaluation area that exceeds 0.25 acres in size, GE must remove soils containing PCB concentrations greater than 10 ppm from the top foot in unpaved portions of such evaluation areas.

3.2.2 Area-Specific PCB Evaluation Procedures

The procedures used to evaluate PCB concentrations in soil are established in Attachment E to the SOW (Protocols for PCB Spatial Averaging). The PCB evaluations presented in this RD/RA Work Plan incorporate the usable PCB data from historical samples, samples collected by EPA, and the pre-design soil samples collected by GE (including the data from the supplemental soil samples). The locations of the PCB samples used in the evaluations for the Group 3C and 3D floodplain properties are shown on Figures 1-3 and 1-4, respectively.

The initial task in the PCB evaluation process for the Group 3C and 3D floodplain properties was to assess the PCB concentrations in soil under existing conditions. This task involved two general steps. First, for evaluation areas that exceed 0.25 acre in size, the discrete PCB concentrations in the top foot of soil in unpaved portions of each evaluation area were compared to the applicable not-to-exceed (NTE) level of 10 ppm. Second, spatial average PCB concentrations were calculated for each depth increment at each evaluation area using the polygon-based spatial averaging techniques described in Attachment E to the SOW without consideration of anticipated removals to address the NTE level. These techniques involve the following steps:

- For each evaluation area and depth increment, a detailed site plan was first developed to illustrate the following: property/evaluation area boundaries; surface topography; soil sampling locations within and adjacent to the evaluation area; locations of roadways, utilities, easements, etc.; locations of buildings and other permanent structures; and other significant site features.
- Next, Thiessen polygon maps were developed for each evaluation area and depth increment. Thiessen polygon mapping involves the use of computer software to draw perpendicular bisector lines between adjacent sample locations to create two-dimensional, sample-specific polygon areas. Certain boundary conditions impact the generation of Thiessen polygons, such as the boundaries of the area subject to averaging, presence of paved and unpaved areas, easement boundaries, building footprints, property lines, etc. As appropriate, the computer-generated Thiessen polygons were modified to reflect actual site conditions, presence/absence of soil at a given depth, locations of property lines, or other specific or unique site considerations. Once the Thiessen polygon mapping was complete, all of the soil areas and depths potentially subject to response actions were adequately characterized for use in subsequent evaluations. After generation of the Thiessen polygons, polygon identification numbers were assigned to each polygon and the surface area of each polygon was calculated.
- Computer spreadsheets were then prepared to combine information obtained from the Thiessen polygon mapping (i.e., polygon ID and area for each polygon) with the analytical results of soil sampling to provide a three-dimensional characterization of the soils associated with each polygon. The volume of soil associated with each polygon was based on the surface area of the polygon multiplied by the corresponding depth of soil for which samples were collected. Using the information described above, a spatial average PCB concentration was derived by multiplying the volume of each polygon by the corresponding PCB concentration, summing the results of this calculation for each polygon involved in the evaluation, and then

dividing that sum by the cumulative soil volume associated with all of the polygons. This procedure yields a spatial average PCB concentration that incorporates both volume- and area-weighted considerations.

The resulting spatial average PCB concentrations for the 0- to 1-foot and 1- to X-foot depth increments were then compared to the applicable PCB Performance Standard of 2 ppm to determine whether soil remediation is necessary to address PCBs.

As shown on Figures 1-3 and 1-4, GE previously performed soil removal activities within portions of the Group 3C and 3D properties, respectively. Specifically, GE conducted removal activities within Parcels I7-2-1, I7-2-3 and I7-2-20 of Group 3C and within Parcels I7-3-1 and I7-99-000 of Group 3D pursuant to the Massachusetts Contingency Plan (MCP) under the direction of the MDEP. Following performance of those removals, EPA and GE performed PCB investigations within each of the Group 3C and 3D properties, including areas that were previously remediated. As a result, and as a conservative measure, GE elected to utilize the current representative data set in the performance of PCB evaluations for the Group 3C and 3D floodplain properties instead of integrating the prior removals into these evaluations.

For areas where there were exceedances of the applicable NTE level in the top foot of unpaved soil or where the spatial average PCB concentrations exceeded the applicable Performance Standard, a remediation proposal was developed. For this RAA, all proposed remediation activities consist of soil removal/replacement. For such areas, an evaluation was conducted to confirm that the proposed soil removal/replacement would achieve the applicable PCB Performance Standard. In accordance with the procedures for the anticipated post-remediation evaluations in Attachment E to the SOW, this evaluation consisted of the following steps: First, the spatial averaging procedures described above were used to assess the PCB concentrations at each evaluation area in its post-remediation condition by: (1) assuming the removal of soils within subject polygons to the required depth; (2) assuming that the excavated soils are replaced with backfill material that contains PCBs at an assumed concentration of 0.021 ppm (i.e., the average concentration of PCBs in sampled backfill sources, as indicated in Table 2 of GE's *Proposed Backfill Data Set for CD Sites*, March 11, 2003); and (3) calculating the anticipated post-remediation spatial average PCB concentration(s). The anticipated post-remediation spatial average PCB concentrations were then compared to the Performance Standard to ensure that the proposed remediation will achieve that Performance Standard. The PCB evaluation results are summarized on an area-by-area basis in Sections 4 and 5, with supporting documentation (i.e., evaluation tables and polygon figures) provided in Appendix B.

3.3 Summary of Appendix IX+3 Constituent Evaluation Procedures

This section describes the procedures used to evaluate non-PCB Appendix IX+3 constituents in soil. In accordance with the SOW (pp. 69-70 and Attachment F at p. 2) and the Interim PDI Report, sampling for such non-PCB constituents was not conducted and evaluations of those constituents were not performed for evaluation areas where review of the data indicated that remediation will not be necessary to address PCBs. For each of the remaining evaluation areas, the non-PCB Appendix IX+3 constituents were evaluated first for the area in its existing condition. Then, for each such area where the applicable Performance Standards are not met, a remediation proposal was developed, and post-remediation conditions were evaluated to ensure achievement of the Performance Standards. This section includes an overview of the applicable Performance Standards, an overview of the evaluation process used to assess achievement of those standards, and detailed descriptions of the specific evaluation procedures used. The evaluation results are summarized on an area-by-area basis in Sections 4 and 5, with supporting documentation provided in Appendix C (evaluation tables).

3.3.1 Applicable Performance Standards

The applicable Performance Standards for non-PCB Appendix IX+3 constituents in soil at the Group 3C and 3D floodplain properties are as follows:

- For dioxins and furans, total Toxicity Equivalency Quotient (TEQ) concentrations were calculated using the Toxicity Equivalency Factors (TEFs) developed by the World Health Organization (WHO) (van den Berg J. et al., *Environ. Health Perspectives*, Vol. 106, No. 12, Dec. 1998). Either the maximum TEQ concentration or the 95% upper confidence limit on the mean (95% UCL) of the TEQ data must be below the Preliminary Remediation Goal (PRG) developed by EPA for dioxin/furan TEQs at residential areas, which is 1 ppb in the 0- to 1-foot and 1- to X-foot depth increments.
- For other non-PCB constituents, any combination of the following must be achieved: (1) maximum concentrations of individual constituents that do not exceed the Screening PRGs established or approved by EPA (as discussed below); or (2) for the remaining constituents, average concentrations that either: (a) do not exceed the MCP Method 1 soil standards (or Method 2 standards, if developed); or (b) are shown through an area-specific risk evaluation to have cumulative risk levels that do not exceed (after rounding) an excess lifetime cancer risk of 1×10^{-5} and a non-cancer Hazard Index (HI) of 1. Based on the results of the

non-PCB evaluations performed for each evaluation area within the Group 3C and 3D floodplain properties, no area-specific risk evaluations were conducted during the RD/RA activities described herein.

3.3.2 Overview of Evaluation Process

The initial task performed in the evaluation of non-PCB constituents in soil at the Group 3C and 3D floodplain properties was to assess such constituents in soil at each evaluation area under existing conditions, based on available Appendix IX+3 data collected from that area. This assessment consisted of several steps:

- First, a screening step was conducted which generally involved comparison of the maximum concentrations of all detected constituents (other than dioxin/furan TEQs) to the applicable PRGs developed by EPA Region 9 (as set forth in Exhibit F-1 to Attachment F of the SOW) or certain surrogate PRGs previously approved by EPA or proposed herein for those constituents that do not have EPA Region 9 PRGs. This screening step is discussed further in Section 3.3.3.
- Second, for dioxin/furan TEQs, the maximum concentration or 95% UCL (whichever is lower) at each evaluation area and relevant depth increment was compared to the dioxin/furan PRG described above. This step is discussed further in Section 3.3.4.
- Third, for those constituents (other than dioxin/furan TEQs) that were not screened out in Step 1, the existing average concentrations of each such constituent were calculated for the same depth increments used for the required PCB evaluations. These average concentrations were then compared to the MCP Method 1 soil standards for such constituents. For purposes of this comparison, based on agreement between GE and EPA and consistent with the evaluations presented in the approved RD/RA Work Plan for the Group 3A and 3B floodplain properties, GE used the “Wave 2” Method 1 soil standards proposed by MDEP in September 2004, in lieu of the current Method 1 soil standards, because those Wave 2 Method 1 soil standards are expected to be finalized prior to implementation of the remediation actions at these floodplain properties. (In May 2005, MDEP proposed revisions to the Wave 2 Method 1 soil standards for certain constituents, but those revisions do not affect any of the constituents that were retained for comparison to the Method 1 soil standards at the Group 3C and 3D floodplain properties.) This step is discussed further in Section 3.3.5.

At evaluation areas where these evaluations indicated the need for remediation to address non-PCB constituents in soil, a remediation proposal was developed, consisting of removal/replacement of the soil containing the

samples that had concentrations causing the exceedance(s) of the applicable standards. For such areas, an evaluation was then conducted of post-remediation conditions, which consisted of repeating Steps 2 through 3 of the above-described process, as necessary, to demonstrate that the proposed remediation will achieve the applicable Performance Standards for non-PCB constituents. The specific procedures used to take account of the proposed soil removal/replacement in these post-remediation evaluations are discussed further in Section 3.3.6.

3.3.3 Screening Evaluation Procedures

As noted above, the first step in the evaluation of non-PCB constituents in soil under existing conditions at the averaging areas within the Group 3C and 3D floodplain properties was the performance of a screening evaluation. In this step, the maximum concentrations of all detected constituents (other than dioxins/furans) were compared to the EPA Region 9 PRGs set forth in Exhibit F-1 to Attachment F of the SOW, using residential PRGs for each of the evaluation areas. However, for certain constituents, EPA Region 9 PRGs are not available. For some of these constituents, the SOW identifies surrogate PRGs that may be used for screening purposes. Specifically, in accordance with the SOW, for polycyclic aromatic hydrocarbons (PAHs) for which EPA Region 9 PRGs do not exist, the EPA Region 9 PRG for benzo(a)pyrene was used for carcinogenic PAHs and the EPA Region 9 PRG for naphthalene was used for non-carcinogenic PAHs. In addition, for certain other constituents that do not have EPA Region 9 PRGs, this screening step used the PRGs for surrogate compounds which have been previously approved by EPA for use at other RAAs. Finally, for two compounds (4-Bromophenyl-phenylether and o,o,o-Triethylphosphorothioate) which have not previously been detected at this Site, which were detected in one sample at this RAA, and which do not have Region 9 PRGs, the following proposed surrogate PRGs were used, based on the structural similarity of the compounds: (1) for 4-Bromophenyl-phenylether, the PRG for octobromodiphenyl ether; and (2) for o,o,o-triethylphosphorothioate, the PRG for phorate. The Region 9 PRGs and surrogate PRGs used in this step are collectively referred to herein as “Screening PRGs.”

At one evaluation area, Parcel I7-2-20, an additional screening criterion was applied. At that area, one constituent, benzidine, was detected in one out of 11 samples at a concentration above the PRG. There is no Method 1 soil standard for this constituent. In this case, GE proposes to screen out benzidine based on very low frequency of detection, as discussed in Section 4.6.2.1 below.

3.3.4 Dioxin/Furan Evaluation Procedures

For each dioxin/furan sample, a total TEQ concentration was calculated using the WHO TEFs. In making these calculations, the concentrations of the individual dioxin/furan compounds that were not detected in a given sample were represented as one-half the analytical detection limit for such compounds. Then, for each evaluation area and relevant depth increment, the maximum TEQ concentration was compared to the PRG identified in the SOW for residential properties – 1 ppb. If the maximum TEQ concentrations at each evaluation area were less than that PRG, it was concluded that no further response actions are necessary to address dioxin/furan TEQs.

3.3.5 Comparisons to MCP Method 1 (Wave 2) Soil Standards

For each constituent (other than dioxins/furans) that was not eliminated in the screening step, an average concentration was calculated for the evaluation area and depth increment in question and compared to the applicable MCP Method 1 (Wave 2) soil standards. In calculating these average concentrations, non-detect sample results were represented as one-half the analytical detection limit.

The Group 3C and 3D floodplain properties are composed of residential areas only. For residential areas, the SOW and the MCP provide for the use of Category S-1 soil standards. Therefore, for the 0- to 1-foot and 1- to X-foot depth increments, the average concentrations in each depth increment were compared to the Category S-1 soil standards within the Wave 2 Method 1 standards.

It should also be noted that the numerical values of the MCP Method 1 soil standards vary depending on the applicable MCP groundwater classification. For the Group 3C and 3D floodplain properties, two MCP groundwater classifications apply depending on the specific location within the RAA: GW-2 groundwater is groundwater located within 15 feet of the ground surface and within 30 feet of occupied structures, while GW-3 groundwater applies to all areas within the RAA. For all the constituents that were subject to this phase of Appendix IX+3 evaluations at the Group 3C and 3D floodplain properties, the MCP Method 1 (Wave 2) soil standards for a given soil category are the same regardless of whether the groundwater is classified as GW-2 or GW-3.

3.3.6 Evaluation of Anticipated Post-Remediation Conditions

For the evaluation areas where non-PCB constituents in soil under existing conditions exceed the applicable Performance Standards, a remediation proposal was developed and evaluations were conducted to demonstrate that the proposed remediation will achieve the Performance Standards for the non-PCB constituents. These post-remediation evaluations followed the same procedures described above for existing conditions.

In these post-remediation evaluations, the sample results from soil proposed for removal to address non-PCB constituents were eliminated from consideration, and it was assumed that such soil will be replaced with an equal volume of clean soil containing the concentrations of organic and inorganic constituents listed in Table 2 of GE's *Proposed Backfill Data Set for CD Sites* (March 11, 2003). However, where removal is proposed to address non-PCB constituents in a given depth increment, the post-remediation evaluations for other depth increments were based on existing conditions to be conservative. For example, if soil removal is proposed to address a sample collected from the 1- to X-foot depth increment, the post-remediation evaluation for the 0- to 1-foot depth increment at that area did not incorporate that soil removal even though the removal will in fact remove some soil from the top foot. Rather, the post-remediation evaluation for the 0- to 1-foot depth increment was based on existing conditions and only the post-remediation evaluation for the 1- to X-foot depth increment took account of the soil removal.

4. PCB and Non-PCB Soil Evaluations for Group 3C Floodplain Properties

4.1 General

This section presents the results of the area-specific PCB and non-PCB Appendix IX+3 evaluations that were performed for the identified evaluation areas within the Group 3C floodplain properties in accordance with the evaluation procedures summarized in Section 3 of this Work Plan.

In this section, the following information is presented for each of the evaluation areas in the Group 3C floodplain properties:

- Description of area;
- Evaluation of existing conditions with respect to PCBs and discussion of the need for remediation to achieve the PCB Performance Standards;
- Evaluation of existing conditions with respect to those constituents and discussion of the need for remediation to address these constituents;
- Description of proposed remediation actions (shown on Technical Drawings provided in Appendix A);
- Evaluation of post-remediation conditions with respect to PCBs, if required; and
- Evaluation of post-remediation conditions with respect to other Appendix IX+3 constituents, if required.

The proposed soil removal actions for these properties are depicted in detail in Technical Drawing 5 in Appendix A, which shows the aerial extent and the depth and/or elevation of the proposed removal. Where such remediation extends to the riverbank being addressed by EPA, that drawing shows the top-of-bank line agreed upon between GE and EPA.

Following the discussion of the area-specific evaluations, this section presents an overall summary of the remediation actions proposed for the Group 3C floodplain properties, including soil removal volumes.

In support of the evaluations presented in this section, GE has prepared backup documentation for these evaluations. Specifically, spatial averaging tables and Theissen polygon maps developed in support of the area-

specific PCB evaluations are presented in Appendix B and evaluation tables developed in support of the Appendix IX+3 evaluations summarized herein are presented in Appendix C.

4.2 Evaluations for Parcel I7-2-1

As shown on Figure 1-2, Parcel I7-2-1 is generally bordered by Parcel I7-2-20 and the East Branch of the Housatonic River to the north and east, Pomeroy Avenue to the southwest, and Parcel I7-2-2 to the northwest. Since this area is greater than 0.25 acre in size, the NTE criterion of 10 ppm for the top foot of soil in unpaved areas applies.

4.2.1 PCB Evaluation – Existing Conditions

In evaluating Parcel I7-2-1, the available PCB soils data and the spatial averaging procedures discussed in Section 3 were used to calculate average PCB concentrations for each of the relevant depth increments. In accordance with the EPA-approved Second Interim PDI Report, an X value of 6 feet was utilized for this evaluation area. The following table presents the existing average PCB concentrations calculated for this area, together with references to the corresponding tables in Appendix B and the applicable Performance Standard:

Depth Increment	Appendix B Table Reference	Existing Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-1	12.10	2
1 – 6'	B-2	18.95	2

As indicated in the preceding table, the existing average PCB concentrations exceed the Performance Standard for the 0- to 1-foot and 1- to X-foot depth increments. As a result, remediation is required to achieve that standard.

In addition, the evaluation process for Parcel I7-2-1 included the identification of soil sample locations in the top foot of unpaved portions with PCB concentrations greater than 10 ppm. Such soils are subject to removal in accordance with the SOW to address exceedance(s) of the NTE level. This step resulted in the identification of 20 such soil sample locations (3C-SB-23, 3C-SB-24, 3C-SB-25, 3C-SB-26, 3C-SS-20, 3C-SS-30, I7-2-1C, I7-2-1D, I7-2-20-19, R63BZ158, R63BZ182, R63C114, R63CZ126, R63CZ138, R63CZ150, R63DZ097, R63DZ108, R63EZ084, R63EZ098, and R63FZ060).

4.2.2 Appendix IX+3 Evaluation – Existing Conditions

The Appendix IX+3 data used in the evaluations for Parcel I7-2-1 are presented in Table C-1.

4.2.2.1 Screening Evaluation

Consistent with the protocols established in the SOW and summarized in Section 3.3.3 of this Work Plan, the maximum concentration of each detected non-PCB constituent (other than dioxins/furans) was compared to its corresponding Screening PRG. Table C-2 identifies the detected constituents and provides a comparison of the maximum detected concentration of each of those constituents to the applicable Screening PRG. As shown in that table, the following constituents have maximum detected concentrations that exceed their corresponding Screening PRGs:

- Benzo(a)anthracene
- Benzo(a)pyrene
- Benzo(b)fluoranthene
- Benzo(k)fluoranthene
- Dibenzo(a,h)anthracene
- Indeno(1,2,3-cd)anthracene
- Arsenic

These constituents were retained for further evaluation, along with dioxin/furan TEQs.

4.2.2.2 Evaluation of Retained Constituents

For the Appendix IX+3 constituents retained for further evaluation, the next component of the Appendix IX+3 evaluation involved the comparison of average constituent concentrations (except for dioxin/furan TEQs) to the applicable MCP Method 1 (Wave 2) soil standards and comparison of maximum dioxin/furan TEQ concentrations to the applicable EPA PRG.

Tables C-3 and C-4 present the evaluations of retained constituents for the 0- to 1-foot and 1- to X-foot depth increments, respectively. As indicated in those tables, all dioxin/furan TEQ concentrations are below the

applicable PRG. However, the existing average concentration for benzo(a)pyrene is greater than the applicable MCP Method 1 (Wave 2) soil standard in the 0- to 1-foot depth increment. Therefore, as discussed below, GE is proposing to remove soil in the top foot of soil in the vicinity of sample location 3C-A9-1 to address the elevated level of benzo(a)pyrene at that location.

4.2.3 Proposed Remediation

Based on the evaluations presented above, GE is proposing to conduct soil removal/replacement activities at Parcel I7-2-1 to the limits shown on Technical Drawing 5 (Appendix A). This remediation will involve excavation of approximately 945 cubic yards of soil. Performance of these activities will result in the achievement of the PCB and Appendix IX+3 Performance Standards for this area, as demonstrated in Sections 4.2.4 and 4.2.5.

4.2.4 PCB Evaluation – Post-Remediation Conditions

The proposed remediation shown on Technical Drawing 5 will involve removal of the unpaved surface soils associated with the PCB sample results exceeding the NTE level, and it will result in achievement of the PCB Performance Standard for the relevant depth increments, as indicated in the following table.

Depth Increment	Appendix B Table Reference	Post Remediation Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-3	0.81	2
1 – 6'	B-4	1.81	2

4.2.5 Appendix IX+3 Evaluation – Post-Remediation Conditions

As shown on Technical Drawing 5, GE will remove certain soils associated with the 0- to 1-foot depth increment at sample location 3C-A9-1 due to an elevated benzo(a)pyrene concentration. Table C-5 presents the post-remediation conditions for non-PCB constituents with respect to MCP Method 1 (Wave 2) soil standards in the 0- to 1-foot depth increment. As shown in this table, post-remediation conditions for benzo(a)pyrene will achieve applicable MCP Method 1 (Wave 2) soil standard for that constituent. For these reasons, the remediation proposed above for Parcel I7-2-1 will achieve the applicable Performance Standards for this area and no further sampling or remediation will be required.

4.3 Evaluations for Parcel I7-2-2

As shown on Figure 1-2, Parcel I7-2-2 is generally bordered by Parcel I7-2-20 to the northeast, Parcel I7-2-1 to the southeast, Pomeroy Avenue to the southwest, and Parcel I7-2-3 to the northwest. Since this area is less than 0.25 acre in size, the NTE criterion does not apply.

4.3.1 PCB Evaluation – Existing Conditions

The PCB evaluation process for Parcel I7-2-2 involved the use of available PCB soils data and the spatial averaging procedures discussed in Section 3 to calculate average PCB concentrations for each of the relevant depth increments. In accordance with the EPA-approved Second Interim PDI Report, an X value of 2 feet was utilized for this evaluation area. The following table presents the existing average PCB concentrations calculated for this area, together with references to the corresponding tables in Appendix B and the applicable Performance Standard:

Depth Increment	Appendix B Table Reference	Existing Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-5	3.20	2
1 – 2'	B-6	0.55	2

As indicated in the preceding table, the existing average PCB concentration exceeds the Performance Standard in the 0- to 1-foot depth increment. As a result, remediation in the 0- to 1-foot depth increment is required to achieve that standard.

4.3.2 Appendix IX+3 Evaluation – Existing Conditions

The Appendix IX+3 data used in the evaluations for Parcel I7-2-2 are presented in Table C-6.

4.3.2.1 Screening Evaluation

The maximum concentration of each detected non-PCB constituent (other than dioxins/furans) was compared to its corresponding Screening PRG. Table C-7 identifies the detected constituents and provides a comparison of the maximum detected concentration of each of those constituents to the applicable Screening PRG. As shown

in that table, the following constituents have maximum detected concentrations that exceed their corresponding Screening PRGs:

- Benzo(a)pyrene
- Arsenic

These constituents were retained for further evaluation, along with dioxin/furan TEQs.

4.3.2.2 Evaluation of Retained Constituents

For the Appendix IX+3 constituents retained for further evaluation, the next component of the Appendix IX+3 evaluation involved the comparison of average constituent concentrations (except for dioxin/furan TEQs) to the applicable MCP Method 1 (Wave 2) soil standards and comparison of maximum dioxin/furan TEQ concentrations to the applicable EPA PRG.

Tables C-8 and C-9 present the evaluations of retained constituents for the 0- to 1-foot and 1- to X-foot depth increments, respectively. As indicated in those tables, all dioxin/furan TEQ concentrations are below the applicable PRG, and the average concentrations of the other retained constituents are less than their corresponding MCP Method 1 (Wave 2) soil standards. As a result, no remediation is necessary to achieve the Appendix IX+3 Performance Standards at this evaluation area.

4.3.3 Proposed Remediation

Based on the evaluations presented above, GE is proposing to conduct soil removal/replacement activities at Parcel I7-2-2 to the limits shown on Technical Drawing 5 (Appendix A). This remediation will involve excavation of approximately 25 cubic yards of soil. Performance of these activities will result in the achievement of the PCB Performance Standards for this area, as demonstrated in Sections 4.3.4.

4.3.4 PCB Evaluation – Post-Remediation Conditions

The proposed remediation shown on Technical Drawing 5 will result in the achievement of the PCB Performance Standard for the relevant depth increments, as indicated in the following table.

Depth Increment	Appendix B Table Reference	Post Remediation Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-7	1.78	2
1 – 2'	B-6	0.55	2

4.4 Evaluations for Parcel I7-2-3

As shown on Figure 1-2, Parcel I7-2-3 is generally bordered by Parcel I7-2-20 to the northeast, Parcel I7-2-2 to the southeast, Pomeroy Avenue to the southwest, and Parcel I7-2-4 to the northwest. Since this area is less than 0.25 acre in size, the NTE criterion does not apply.

4.4.1 PCB Evaluation – Existing Conditions

The PCB evaluation process for Parcel I7-2-3 involved the use of available PCB soils data and the spatial averaging procedures discussed in Section 3 to calculate average PCB concentrations for each of the relevant depth increments. In accordance with the EPA-approved Second Interim PDI Report, an X value of 4 feet was utilized for this evaluation area. The following table presents the existing average PCB concentrations calculated for this area, together with references to the corresponding tables in Appendix B and the applicable Performance Standard:

Depth Increment	Appendix B Table Reference	Existing Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-8	5.44	2
1 – 4'	B-9	1.33	2

As indicated in the preceding table, the existing average PCB concentration exceeds the Performance Standard in the 0- to 1-foot depth increment. As a result, remediation is required to achieve that standard.

4.4.2 Appendix IX+3 Evaluation – Existing Conditions

The Appendix IX+3 data used in the evaluations for Parcel I7-2-3 are presented in Table C-10.

4.4.2.1 Screening Evaluation

The maximum concentration of each detected non-PCB constituent (other than dioxins/furans) was compared to its corresponding Screening PRG. Table C-11 identifies the detected constituents and provides a comparison of the maximum detected concentration of each of those constituents to the applicable Screening PRG. As shown in that table, the following constituents have maximum detected concentrations that exceed their corresponding Screening PRGs:

- Benzo(a)anthracene
- Benzo(a)pyrene
- Benzo(b)fluoranthene
- Dibenzo(a,h)anthracene
- Indeno(1,2,3-cd)anthracene
- Arsenic

These constituents were retained for further evaluation, along with dioxin/furan TEQs.

4.4.2.2 Evaluation of Retained Constituents

For the Appendix IX+3 constituents retained for further evaluation, the next component of the Appendix IX+3 evaluation involved the comparison of average constituent concentrations (except for dioxin/furan TEQs) to the applicable MCP Method 1 (Wave 2) soil standards and comparison of maximum dioxin/furan TEQ concentrations to the applicable EPA PRG.

Tables C-12 and C-13 present the evaluations of retained constituents for the 0- to 1-foot and 1- to X-foot depth increments, respectively. As indicated in those tables, all dioxin/furan TEQ concentrations are below the applicable PRG, and the average concentrations of the other retained constituents are less than their corresponding MCP Method 1 (Wave 2) soil standards. As a result, no remediation is necessary to achieve the Appendix IX+3 Performance Standards at this evaluation area.

4.4.3 Proposed Remediation

Based on the evaluations presented above, GE is proposing to conduct soil removal/replacement activities at Parcel I7-2-3 to the limits shown on Technical Drawing 5 (Appendix A). This remediation will involve excavation of approximately 120 cubic yards of soil. Performance of these activities will result in the achievement of the PCB Performance Standards for this area, as demonstrated in Section 4.4.4.

4.4.4 PCB Evaluation – Post-Remediation Conditions

The proposed remediation shown on Technical Drawing 5 will result in the achievement of the PCB Performance Standard for the relevant depth increments, as indicated in the following table.

Depth Increment	Appendix B Table Reference	Post Remediation Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-10	1.92	2
1 – 4'	B-9	1.33	2

4.5 Evaluations of Parcel I7-2-4

As shown on Figure 1-2, Parcel I7-2-4 is generally bordered by Parcel I7-2-20 to the northeast, Parcel I7-2-3 to the southeast, Pomeroy Avenue to the southwest, and another residential property (outside of Group 3C) to the northwest. Since this area is less than 0.25 acre in size, the NTE criterion does not apply.

4.5.1 PCB Evaluation – Existing Conditions

The PCB evaluation process for Parcel I7-2-4 involved the use of available PCB soils data and the spatial averaging procedures discussed in Section 3 to calculate average PCB concentrations for each of the relevant depth increments. In accordance with the EPA-approved Second Interim PDI Report, an X value of 2 feet was utilized for this evaluation area. The following table presents the existing average PCB concentrations calculated for this area, together with references to the corresponding tables in Appendix B and the applicable Performance Standard:

Depth Increment	Appendix B Table Reference	Existing Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-11	1.43	2
1 – 2'	B-12	1.52	2

As indicated in the preceding table, the existing average PCB concentrations are below the Performance Standard for the 0- to 1-foot and 1- to X-foot depth increments. As a result, no remediation is required to achieve that standard.

4.5.2 Appendix IX+3 Evaluation – Existing Conditions

The Appendix IX+3 data used in the evaluations for Parcel I7-2-4 are presented in Table C-14.

4.5.2.1 Screening Evaluation

The maximum concentration of each detected non-PCB constituent (other than dioxins/furans) was compared to its corresponding Screening PRG. Table C-15 identifies the detected constituents and provides a comparison of the maximum detected concentration of each of those constituents to the applicable Screening PRG. As shown in that table, the following constituents have maximum detected concentrations that exceed their corresponding Screening PRGs:

- Benzo(a)anthracene
- Benzo(a)pyrene
- Benzo(b)fluoranthene
- Arsenic

These constituents were retained for further evaluation, along with dioxin/furan TEQs.

4.5.2.2 Evaluation of Retained Constituents

For the Appendix IX+3 constituents retained for further evaluation, the next component of the Appendix IX+3 evaluation involved the comparison of average constituent concentrations (except for dioxin/furan TEQs) to the

applicable MCP Method 1 (Wave 2) soil standards and comparison of maximum dioxin/furan TEQ concentrations to the applicable EPA PRG.

Tables C-16 and C-17 present the evaluations of retained constituents for the 0- to 1-foot and 1- to X-foot depth increments, respectively. As indicated in those tables, all dioxin/furan TEQ concentrations are below the applicable PRG, and the average concentrations of the other retained constituents are less than their corresponding MCP Method 1 (Wave 2) soil standards. As a result, no remediation is necessary to achieve the Appendix IX+3 Performance Standards at this evaluation area.

4.6 Evaluations for Parcel I7-2-20

As shown on Figure 1-2, Parcel I7-2-20 is generally bordered by the riverbank of the East Branch of the Housatonic River to the east, Parcels I7-2-1, I7-2-2, I7-2-3, and I7-2-4 to the southwest, and other residential properties (outside of Group 3C) to the northwest. Since this area is greater than 0.25 acre in size, the NTE criterion of 10 ppm for the top foot of soil in unpaved areas applies.

4.6.1 PCB Evaluation – Existing Conditions

In evaluating Parcel I7-2-20, the available PCB soils data and the spatial averaging procedures discussed in Section 3 were used to calculate average PCB concentrations for each of the relevant depth increments. In accordance with the EPA-approved Second Interim PDI Report, an X value of 6 feet was utilized for this evaluation area. The following table presents the existing average PCB concentrations calculated for this area, together with references to the corresponding tables in Appendix B and the applicable Performance Standard:

Depth Increment	Appendix B Table Reference	Existing Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-13	12.70	2
1 – 6'	B-14	7.02	2

As indicated in the preceding table, the existing average PCB concentrations exceed the Performance Standard for the 0- to 1-foot and 1- to X-foot depth increments. As a result, remediation is required to achieve that standard.

In addition, the evaluation process for Parcel I7-2-20 included the identification of soil sample locations in the top foot of unpaved portions with PCB concentrations greater than 10 ppm. Such soils are subject to removal in accordance with the SOW to address exceedance(s) of the NTE level. This step resulted in the identification of 39 such soil sample locations (3C-SB-1, 3C-SB-14, 3C-SB-18, 3C-SS-7, 3C-SS-16, 3C-SS-17, 3C-SS-18, 3C-SS-26, 3C-SS-30, 3C-SS-33, BW-0024, BW-0025, BW-0026, BW-0027, I7-2-20-1, I7-2-20-2, I7-2-20-5, I7-2-20-15, I7-2-20-19, I7-2-20-21, I7-2-20-22, I7-2-20-25, I7-2-2-SB-7, I7-2-4-SB-6, R63FZ060, R90A125, R98A050, RB021723, RB021762, SL0194, SL0201, SL0202, SL0203, SL0204, SL0206, SL0207, SL0212, SL0214, and SL0220).

4.6.2 Appendix IX+3 Evaluation – Existing Conditions

The Appendix IX+3 data used in the evaluations for Parcel I7-2-20 are presented in Table C-18.

4.6.2.1 Screening Evaluation

The maximum concentration of each detected non-PCB constituent (other than dioxins/furans) was compared to its corresponding Screening PRG. Table C-19 identifies the detected constituents and provides a comparison of the maximum detected concentration of each of those constituents to the applicable Screening PRG. As shown in that table, the following constituents have maximum detected concentrations that exceed their corresponding Screening PRGs:

- Benzidine
- Benzo(a)anthracene
- Benzo(a)pyrene
- Benzo(b)fluoranthene
- Dibenzo(a,h)anthracene
- Indeno(1,2,3-cd)anthracene
- Arsenic
- Lead

For one of these constituents, benzidine, the constituent was detected in only one of 11 samples at this evaluation area (at an estimated [J-qualified] concentration of 0.30 ppm), and there is no Method 1 soil standard

for this constituent. Accordingly, GE proposes to screen out benzidine from further evaluation based on low frequency of detection. The remaining above-listed constituents were retained for further evaluation, along with dioxin/furan TEQs.

4.6.2.2 Evaluation of Retained Constituents

For the Appendix IX+3 constituents retained for further evaluation, the next component of the Appendix IX+3 evaluation involved the comparison of average constituent concentrations (except for dioxin/furan TEQs) to the applicable MCP Method 1 (Wave 2) soil standards and comparison of maximum dioxin/furan TEQ concentrations to the applicable EPA PRG.

Tables C-20 and C-21 present the evaluations of retained constituents for the 0- to 1-foot and 1- to X-foot depth increments, respectively. As indicated in those tables, all dioxin/furan TEQ concentrations are below the applicable PRG, and the average concentrations of the other retained constituents are less than their corresponding MCP Method 1 (Wave 2) soil standards. As a result, no remediation is necessary to achieve the Appendix IX+3 Performance Standards at this evaluation area.

4.6.3 Proposed Remediation

Based on the evaluations presented above, GE is proposing to conduct soil removal/replacement activities at Parcel I7-2-20 to the limits shown on Technical Drawing 5 (Appendix A). This remediation will involve excavation of approximately 1,800 cubic yards of soil. Performance of these activities will result in the achievement of the PCB Performance Standard for this area, as demonstrated in Section 4.6.4.

4.6.4 PCB Evaluation – Post-Remediation Conditions

The proposed remediation shown on Technical Drawing 5 will involve removal of the unpaved surface soils associated with the PCB sample results exceeding the NTE level, and it will result in achievement of the PCB Performance Standards for the relevant depth increments, as indicated in the following table.

Depth Increment	Appendix B Table Reference	Post Remediation Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-15	1.87	2
1 – 6'	B-16	1.71	2

4.7 Overall Summary

Based on the foregoing evaluations, the soil removal limits that will be necessary to meet the PCB and Appendix IX+3 Performance Standards at the Group 3C floodplain properties are shown on Technical Drawing 5 in Appendix A. The following table presents the estimated soil removal volume proposed for each property (if any).

Evaluation Area	Estimated Soil Removal Volume (cy)
I7-2-1	945
I7-2-2	25
I7-2-3	120
I7-2-4	0
I7-2-20	1,800
Total:	2,890

As indicated in the above table, the remediation at the Group 3C floodplain properties will involve excavation and replacement of a total of approximately 2,890 cubic yards of soil.

5. PCB and Non-PCB Soil Evaluations for Group 3D Floodplain Properties

5.1 General

This section presents the results of the area-specific PCB and non-PCB Appendix IX+3 evaluations which were performed for the identified evaluation areas at the Group 3D floodplain properties. This section follows the same format used in Section 4, with the details of the proposed soil removal actions shown on Technical Drawing 6 in Appendix A.

5.2 Evaluations for Parcel I7-3-1

As shown on Figure 1-2, Parcel I7-3-1 is generally bordered by Parcel I7-99-000 to the north, Appleton Avenue and High Street to the east, Pomeroy Avenue to the south, and the riverbank of the East Branch of the Housatonic River to the west. As discussed in Section 1.2, this parcel has been divided into two evaluation areas, namely I7-3-1 (Front) and I7-3-1 (Back). Evaluation area I7-3-1 (Front) is the eastern portion of the parcel closest to the residence. Evaluation area I7-3-1 (Back) is the western portion of the parcel closest to the riverbank of the Housatonic River. Each area will be discussed separately for the remainder of the evaluation. Since averaging areas I7-3-1 (Front) and I7-3-1 (Back) are each greater than 0.25 acre, the NTE criterion of 10 ppm for the top foot of soil in unpaved areas applies to both.

5.2.1 PCB Evaluation – Existing Conditions

5.2.1.1 PCB Evaluation – Existing Conditions for Parcel I7-3-1 (Front)

In evaluating Parcel I7-3-1 (Front), the available PCB soils data and the spatial averaging procedures discussed in Section 3 were used to calculate average PCB concentrations for each of the relevant depth increments. In accordance with the EPA-approved Second Interim PDI Report, an X value of 2 feet was utilized for this evaluation area. The following table presents the existing average PCB concentrations calculated for this area, together with references to the corresponding tables in Appendix B and the applicable Performance Standard:

Depth Increment	Appendix B Table Reference	Existing Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-17	0.35	2
1 – 2'	B-18	0.29	2

As indicated in the preceding table, none of the existing average PCB concentrations exceeds the Performance Standard. In addition, no surface soil locations within this averaging area had PCB concentrations exceeding the NTE level. As a result, no remediation is required to achieve the PCB Performance Standards at this evaluation area. Since no remediation is required to address PCBs, non-PCB Appendix IX+3 investigations were not performed within this evaluation area.

5.2.1.2 PCB Evaluation – Existing Conditions for Parcel I7-3-1 (Back)

In evaluating Parcel I7-3-1 (Back), the available PCB soils data and the spatial averaging procedures discussed in Section 3 were used to calculate average PCB concentrations for each of the relevant depth increments. In accordance with the EPA-approved Second Interim PDI Report, an X value of 6 feet was utilized for this evaluation area. The following table presents the existing average PCB concentrations calculated for this area, together with references to the corresponding tables in Appendix B and the applicable Performance Standard:

Depth Increment	Appendix B Table Reference	Existing Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-19	4.94	2
1 – 6'	B-20	1.32	2

As indicated in the preceding table, the existing average PCB concentration for the 0- to 1-foot depth increment exceeds the Performance Standard. As a result, remediation is required to achieve that standard.

In addition, the evaluation process for Parcel I7-3-1 (Back) included the identification of soil sample locations in the top foot of unpaved portions with PCB concentrations greater than 10 ppm. Such soils are subject to removal in accordance with the SOW to address exceedance(s) of the NTE level. This step resulted in the identification of 32 such soil sample locations (3D-SB-16, 3D-SS-9, 3D-SS-16, 3D-SS-19, I7-3-1A, I7-3-1B, R62AZ268, R97CZ157, R97DZ170, R97E175, R97EZ182, R97EZ189, R97FZ195, R97G175, R97G200, R97GZ207.5, R97GZ215, R97H100, R97H125, R97H150, R97H175, R97H200, R97HZ213, R97HZ226, R97I100, R97I225, R97IZ234, R97IZ243, R97J100, R97J200, R97K125, and R97L150).

5.2.2 Appendix IX+3 Evaluation – Existing Conditions for Parcel I7-3-1 (Back)

The Appendix IX+3 data used in the evaluations for Parcel I7-3-1 (Back) are presented in Table C-22.

5.2.2.1 Screening Evaluation

The maximum concentration of each detected non-PCB constituent (other than dioxins/furans) was compared to its corresponding Screening PRG. Table C-23 identifies the detected constituents and provides a comparison of the maximum detected concentration of each of those constituents to the applicable Screening PRG. As shown in that table, the following constituents have maximum detected concentrations that exceed their corresponding Screening PRGs:

- Benzo(a)anthracene
- Benzo(a)pyrene
- Benzo(b)fluoranthene
- Dibenzo(a,h)anthracene
- Indeno(1,2,3-cd)pyrene
- Arsenic

These constituents were retained for further evaluation, along with dioxin/furan TEQs.

5.2.2.2 Evaluation of Retained Constituents

For the Appendix IX+3 constituents retained for further evaluation, the next component of the Appendix IX+3 evaluation involved the comparison of average constituent concentrations (except for dioxin/furan TEQs) to the applicable MCP Method 1 (Wave 2) soil standards and comparison of maximum dioxin/furan TEQ concentrations to the applicable EPA PRG.

Tables C-24 and C-25 present the evaluations of retained constituents for the 0- to 1-foot and 1- to X-foot depth increments, respectively. As indicated in those tables, all dioxin/furan TEQ concentrations are below the applicable PRG, and the average concentrations of the other retained constituents are less than the applicable MCP Method 1 (Wave 2) soil standards. As a result, no remediation is necessary to achieve the Appendix IX+3 Performance Standards at this evaluation area.

5.4.3 Proposed Remediation

Based on the evaluations presented above, GE is proposing to conduct soil removal/replacement activities at Parcel I7-3-1 (Back) to the limits shown on Technical Drawing 6 (Appendix A). This remediation will involve excavation of approximately 450 cubic yards of soil. Performance of these activities will result in the achievement of the PCB Performance Standard for this area, as demonstrated in Section 5.4.4.

5.4.4 PCB Evaluation – Post-Remediation Conditions

The proposed remediation shown on Technical Drawing 6 will involve removal of the unpaved surface soils associated with the PCB sample results exceeding the NTE level, and it will result in achievement of the PCB Performance Standard for the relevant depth increments, as indicated in the following table.

Depth Increment	Appendix B Table Reference	Post Remediation Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-21	1.96	2
1 - 6'	B-20	1.32	2

5.3 Evaluations for Parcel I7-3-2

As shown on Figure 1-2, Parcel I7-3-2 is generally bordered by another residential property (outside of Group 3D) to the north, Appleton Avenue to the east, Parcel I7-99-000 to the south, and the riverbank of the East Branch of the Housatonic River to the west. Since this area is greater than 0.25 acre in size, the NTE criterion of 10 ppm for the top foot of soil in unpaved areas applies.

5.3.1 PCB Evaluation – Existing Conditions

In evaluating Parcel I7-3-2, the available PCB soils data and the spatial averaging procedures discussed in Section 3 were used to calculate average PCB concentrations for each of the relevant depth increments. In accordance with the EPA-approved Second Interim PDI Report, an X value of 6 feet was utilized for this evaluation area. The following table presents the existing average PCB concentrations calculated for this area, together with references to the corresponding tables in Appendix B and the applicable Performance Standard:

Depth Increment	Appendix B Table Reference	Existing Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-22	1.78	2
1 – 6'	B-23	0.30	2

As indicated in the preceding table, the existing average PCB concentrations are below the Performance Standard for the 0- to 1-foot and 1- to X-foot depth increments.

However, the evaluation process for this parcel also included the identification of soil samples in the top foot of unpaved portions with PCB concentrations greater than the NTE level of 10 ppm, which are subject to removal in accordance with the SOW. This step resulted in the identification of four such soil sample locations (3D-SB-4, R64AZ163, R64B122, and RB021745). As a result, removal of soil in the 0- to 1-foot depth increment at this parcel is required to address the exceedances of the NTE level at those locations.

5.3.2 Appendix IX+3 Evaluation – Existing Conditions

The Appendix IX+3 data used in the evaluations for Parcel I7-3-2 are presented in Table C-26.

5.3.2.1 Screening Evaluation

The maximum concentration of each detected non-PCB constituent (other than dioxins/furans) was compared to its corresponding Screening PRG. Table C-27 identifies the detected constituents and provides a comparison of the maximum detected concentration of each of those constituents to the applicable Screening PRG. As shown in that table, the following constituents have maximum detected concentrations that exceed their corresponding Screening PRGs:

- Benzo(a)anthracene
- Benzo(a)pyrene
- Benzo(b)fluoranthene
- Arsenic

These constituents were retained for further evaluation, along with dioxin/furan TEQs.

5.3.2.2 Evaluation of Retained Constituents

For the Appendix IX+3 constituents retained for further evaluation, the next component of the Appendix IX+3 evaluation involved the comparison of average constituent concentrations (except for dioxin/furan TEQs) to the applicable MCP Method 1 (Wave 2) soil standards and comparison of maximum dioxin/furan TEQ concentrations to the applicable EPA PRG.

Tables C-28 and C-29 present the evaluations of retained constituents for the 0- to 1-foot and 1- to X-foot depth increments, respectively. As indicated in those tables, all dioxin/furan TEQ concentrations are below the applicable PRG, and the average concentrations of the other retained constituents are less than their corresponding MCP Method 1 (Wave 2) soil standards. As a result, no remediation is necessary to achieve the Appendix IX+3 Performance Standards at this evaluation area.

5.3.3 Proposed Remediation

Based on the evaluations presented above, GE is proposing to conduct soil removal/replacement activities at Parcel I7-3-2 to the limits shown on Technical Drawing 6 (Appendix A). This remediation will involve excavation of approximately 50 cubic yards of soil to address the above-referenced locations where NTE levels were identified.

5.3.4 PCB Evaluation – Post-Remediation Conditions

The proposed remediation shown on Technical Drawing 6 will involve removal of the unpaved surface soils associated with the PCB sample results exceeding the NTE level. In addition, that proposed remediation will further reduce the spatial average PCB concentrations below the PCB Performance Standard, as indicated in the following table.

Depth Increment	Appendix B Table Reference	Post Remediation Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-24	0.77	2
1 - 6'	B-23	0.30	2

5.4 Evaluations for Parcel I7-99-000 (Back)

As shown on Figure 1-2, Parcel I7-99-000 is generally bordered by Parcel I7-3-2 to the north, Appleton Avenue to the east, Parcel I7-3-1 to the south, and the riverbank of the East Branch of the Housatonic River to the west. As discussed in Section 1.2, this parcel was divided into two evaluation areas – namely, the Parcel I7-99-000 (Front) area, which is the eastern portion of the parcel that includes the occupied building; and the Parcel I7-99-000 (Back) area, which is the western portion of the parcel closest to the riverbank of the Housatonic River. However, as proposed in the Second Interim PDI Report and approved by EPA, the Parcel I7-99-000 (Front) area is not subject to RD/RA evaluations because PCBs were not detected at concentrations above 1 ppm in any sample collected in that area. Accordingly, the RD/RA evaluation has been limited to the Parcel I7-99-000 (Back) area. Since that evaluation area is greater than 0.25 acre, the NTE criterion of 10 ppm for the top foot of soil in unpaved areas applies.

5.4.1 PCB Evaluation – Existing Conditions

In evaluating Parcel I7-99-000 (Back), the available PCB soils data and the spatial averaging procedures discussed in Section 3 were used to calculate average PCB concentrations for each of the relevant depth increments. In accordance with the EPA-approved Second Interim PDI Report, an X value of 6 feet was utilized for this evaluation area. The following table presents the existing average PCB concentrations calculated for this area, together with references to the corresponding tables in Appendix B and the applicable Performance Standard:

Depth Increment	Appendix B Table Reference	Existing Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-25	10.50	2
1 – 6'	B-26	14.41	2

As indicated in the preceding table, the existing average PCB concentrations for the 0- to 1-foot and 1- to X-foot depth increments exceed the Performance Standard. As a result, remediation is required to achieve that standard.

In addition, the evaluation process for Parcel I7-99-000 (Back) included the identification of soil sample locations in the top foot of unpaved portions with PCB concentrations greater than 10 ppm. Such soils are subject to removal in accordance with the SOW to address exceedance(s) of the NTE level. This step resulted in the identification of 37 such soil sample locations (3D-SB-4, 3D-SB-10, 3D-SS-9, 3D-SS-19, I7-99-000B-9, I7-

99-000C, I7-99-000B-12, I7-99-000J, I7-99-000Q, R62A150, R62AZ268, R62AZ278, R62B150, R62BZ254, R62C229, R63BZ264, R64CZ241, R62CZ265, R62DZ234, R62DZ243, R62DZ252, R62E150, R62E218, R62EZ226, R62EZ234, R62EZ246, R62F150, R62F219, R62G195, R62GZ221, R62H185, R62HZ191, R62I162, R62IZ170, R62IZ178, R97IZ243, and R97J200).

5.4.2 Appendix IX+3 Evaluation – Existing Conditions

The Appendix IX+3 data used in the evaluations for Parcel I7-99-000 (Back) are presented in Table C-30.

5.4.2.1 Screening Evaluation

The maximum concentration of each detected non-PCB constituent (other than dioxins/furans) was compared to its corresponding Screening PRG. Table C-31 identifies the detected constituents and provides a comparison of the maximum detected concentration of each of those constituents to the applicable Screening PRG. As shown in that table, the following constituents have maximum detected concentrations that exceed their corresponding Screening PRGs:

- Benzo(a)anthracene
- Benzo(a)pyrene
- Benzo(b)fluoranthene
- Dibenzo(a,h)anthracene
- Indeno(1,2,3-cd)pyrene
- Arsenic

These constituents were retained for further evaluation, along with dioxin/furan TEQs.

5.4.2.2 Evaluation of Retained Constituents

For the Appendix IX+3 constituents retained for further evaluation, the next component of the Appendix IX+3 evaluation involved the comparison of average constituent concentrations (except for dioxin/furan TEQs) to the applicable MCP Method 1 (Wave 2) soil standards and comparison of maximum dioxin/furan TEQ concentrations to the applicable EPA PRG.

Tables C-32 and C-33 present the evaluations of retained constituents for the 0- to 1-foot and 1- to X-foot depth increments, respectively. As indicated in those tables, all dioxin/furan TEQ concentrations are below the applicable PRG, and the average concentrations of the other retained constituents are less than the applicable MCP Method 1 (Wave 2) soil standards. As a result, no remediation is necessary to achieve the Appendix IX+3 Performance Standards at this evaluation area.

5.4.3 Proposed Remediation

Based on the evaluations presented above, GE is proposing to conduct soil removal/replacement activities at Parcel I7-99-000 (Back) to the limits shown on Technical Drawing 6 (Appendix A). This remediation will involve excavation of approximately 910 cubic yards of soil. Performance of these activities will result in the achievement of the PCB Performance Standard for this area, as demonstrated in Section 5.4.4.

5.4.4 PCB Evaluation – Post-Remediation Conditions

The proposed remediation shown on Technical Drawing 6 will involve removal of the unpaved surface soils associated with the PCB sample results exceeding the NTE level, and it will result in achievement of the PCB Performance Standard for the relevant depth increments, as indicated in the following table.

Depth Increment	Appendix B Table Reference	Post Remediation Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1'	B-27	0.85	2
1 – 6'	B-28	1.77	2

5.5 Overall Summary

Based on the foregoing evaluations, the soil removal limits that will be necessary to meet the PCB Performance Standards at the Group 3D floodplain properties are shown on Technical Drawing 6 in Appendix A. The following table presents the estimated soil removal volume proposed for each property (if any).

Parcel	Estimated Soil Removal Volume (cy)
I7-3-1 (Back)	450
I7-3-2	50
I7-99-000 (Back)	910
Total:	1,410

As indicated in the above table, the remediation at the Group 3D floodplain properties will involve excavation and replacement of a total of approximately 1,410 cubic yards of soil.

6. Design Information

6.1 General

This section provides additional design-related information for the remediation activities at the Group 3C and 3D floodplain properties. These activities generally consist of excavation of impacted material, disposal of this material at On-Plant Consolidation Areas (OPCAs) located at the GE Pittsfield facility, backfilling of excavations with clean material, and general site restoration. As discussed in Section 7, GE is currently in the process of selecting a Remediation Contractor to perform the remediation actions proposed herein. Section 7 provides further details regarding that selection process, while Section 8 provides additional site-specific implementation details associated with construction of the various design components.

6.2 Technical Specifications

Technical design information regarding soil removal within the Group 3C and 3D floodplain properties is provided in this Work Plan. In addition, certain of the plans comprising GE's Project Operations Plan (POP) provide additional design, construction, and implementation-related information relevant to the construction activities. With the exception of the FSP/QAPP and Health and Safety Plan (HASP) (which was provided to EPA for informational purposes only), the latest revisions to the POP were conditionally approved by EPA in a letter dated April 24, 2003, and were submitted to EPA on July 14, 2003.

The POP contains a series of plans that address several common aspects of the Removal Actions Outside the River and apply to various activities to be conducted as part of those Removal Actions, ranging from initial pre-design activities to the performance and completion of remediation activities. Collectively, these plans describe the minimum requirements, general activities, protocols, and methodologies applicable to these Removal Actions. These plans include a Waste Characterization Plan, Soil Cover/Backfill Characterization Plan, Site Management Plan, Ambient Air Monitoring Plan, and Contingency and Emergency Procedures Plan. The POP also includes a Construction Quality Assurance Plan (CQAP), which provides technical requirements related to items such as backfill, topsoil, seeding, mulch, etc. In addition, the CQAP specifies activities that are relevant to certain of the construction activities, such as soil placement and grading/compaction, survey control, etc. The general provisions of the POP are applicable to the Group 3C and 3D floodplain properties construction activities and are incorporated herein by reference.

The various design details are summarized in this Work Plan, but are more specifically described in the Technical Drawings and Specifications developed by GE for use in selecting a Remediation Contractor. Copies of the Technical Drawings and Specifications are provided in Appendices A and D and include those related to soil removal as well as other construction elements.

6.3 Soil Removal Activities

As described in Sections 4.7 and 5.5, GE will remove approximately 4,300 cubic yards of soil from the Group 3C and 3D floodplain properties. The removal limits are shown on Technical Drawings 5 and 6 in Appendix A. As noted above, where the soil removal extends to the riverbank, the drawings show the top-of-bank line agreed upon between GE and EPA.

Prior to initiating removal activities for the areas subject to soil removal, the horizontal limits of removal will be surveyed and staked in the field. During removal activities, field measurements will be made to verify that the target removal depths/elevations have been achieved for each excavation area. Based on a review of the analytical data on soils located within the limits of these removal actions, excavated soils will be transported to and consolidated at either the Building 71 or the Hill 78 OPCA, as further described in Section 8.5.2. Following removal, common backfill will be obtained from an off-site source (Sections 6.5 and 8.5.3) and will be placed and compacted to re-establish original grade. The provisions specified on the Technical Drawings (Appendix A) and in the Technical Specifications (Appendix D) and POP (including the Soil Cover/Backfill Characterization Plan and the CQAP) will be utilized during the removal and backfill activities.

6.4 Excavation Stabilization

For removal areas where excavations will exceed 4 feet in depth and Contractor personnel will enter the excavations to perform work, the Remediation Contractor will be required to provide some form of excavation sidewall stability in accordance with Occupational Safety and Health Administration (OSHA) requirements. These methods may include, but not be limited to, benching the excavation or installation of a temporary earth-retaining structure (e.g., soldier beam and lagging, trench boxes, etc). For any temporary earth-retaining structure that is planned to be used by the Contractor, a Professional Engineer licensed in the Commonwealth of Massachusetts will design and stamp the system.

6.5 Backfilling Excavations

Soil fill and topsoil components will be used to backfill the excavations at the Group 3C and 3D floodplain properties. Information regarding the measurement, composition, and installation of acceptable backfill materials is provided on the Technical Drawings and in the Technical Specifications provided in Appendices A and D, respectively.

The specific fill sources to be used for this project will be identified by the selected Remediation Contractor. The backfill materials to be used at these properties will originate either from existing sources or from new, currently unidentified sources of backfill material. Existing sources of backfill material consist of those sources that have been previously used for other GE remediation projects in Pittsfield and have been previously qualified for such use in submittals to EPA and/or MDEP. The sample data presented in those documents include analyses for PCBs and Appendix IX+3 VOCs, semivolatile organic compounds (SVOCs), and metals. If such existing, approved sources have been used by GE within the past 18 months, these prior analytical data will not be resubmitted to EPA. For any backfill materials from a source that has not already been identified and characterized, representative samples of proposed fill materials will be collected and analyzed for PCBs and Appendix IX+3 VOCs, SVOCs, and metals, as required by GE's approved Soil Cover/Backfill Characterization Plan provided in the POP. The name of the proposed backfill source location and the results of the analyses for PCBs and Appendix IX+3 VOCs, SVOCs, and metals (if necessary) will be submitted to EPA in a supplemental information package prior to use of such material.

6.6 Flood Storage Capacity

For soil removal/replacement activities, it is expected that the excavation and backfill/restoration activities will be conducted in such a manner as to re-establish the same general ground surface and topography of the affected areas (to the extent feasible). GE does not foresee any impact on the flood storage capacity from these actions.

6.7 Applicable or Relevant and Appropriate Requirements

The Removal Actions to be conducted at the Group 3C and 3D floodplain properties will be subject to several ARARs. Attachment B to the SOW identifies the chemical-, action-, and location-specific ARARs for Removal Actions Outside the River. As noted above, the Removal Action for the Group 3C and 3D floodplain properties includes soil removal/replacement. These activities will be performed within the 100-year floodplain of the Housatonic River. In these circumstances, this Removal Action is subject to the following ARARs identified in

Attachment B to the SOW: action-specific ARARs identified in Table 2, subsection B (“Soil Removal”), subsections I and J (regarding consolidation of excavated soils at the OPCAs), and potentially subsection K (“Other”); and location-specific ARARs identified in Table 3, subsection B (“Floodplains, Wetlands, and Banks”). If excavation activities involve removal and on-site storage (at the GE Plant Area) of free product, intact drums, and/or other materials that cannot be consolidated at the OPCAs, and thus will be subsequently disposed off site, the ARARs identified in Table 2, subsection H (“Temporary On-Site Storage of Free Product, Drums, and Equipment That Will Be Disposed of Off-Site”) of Attachment B to the SOW will apply to such storage. In addition, disposition of excavated materials at GE’s OPCAs will be subject to the ARARs for consolidation at the OPCAs (set forth in Table 1 of the Detailed Work Plan for OPCAs).

A summary of the ARARs that were considered with respect to the remediation proposed herein, along with the associated project component(s) and means by which the ARAR is addressed by the design and implementation activities, is as follows:

ARAR	Associated Project Components	Means by Which ARAR Will Be Addressed
Toxic Substances Control Act (TSCA) Regulations (PCB Remediation Waste) (40 CFR 761.61)	<ul style="list-style-type: none"> • Soil removal 	<ul style="list-style-type: none"> • EPA has determined that Removal Actions conducted in accordance with the CD and SOW will not pose an unreasonable risk of injury to health or the environment.
TSCA Regulations (Decontamination) (40 CFR 761.79)	<ul style="list-style-type: none"> • Soil removal (equipment cleaning) 	<ul style="list-style-type: none"> • Will be attained by cleaning equipment as necessary in accordance with TSCA regulations (see Section 8.5.5).
Resource Conservation and Recovery Act (RCRA) Hazardous Waste Regulations (40 CFR 261.24)	<ul style="list-style-type: none"> • Soil removal 	<ul style="list-style-type: none"> • GE will review the relevant Appendix IX+3 data from the soils to be excavated, using a conservative screening tool (i.e., dividing the total sample results by 20) and comparing the results to allowable concentration limits associated with the Toxicity Characteristic Leaching Procedure (TCLP) under these regulations. If exceedances result from this comparison, soils will be placed in the Building 71 OPCA. Other soils will be subject to placement in either OPCA.

ARAR	Associated Project Components	Means by Which ARAR Will Be Addressed
Clean Water Act NPDES Regulations (Stormwater Discharges) (40 CFR 122.44(k); 40 CFR 122.26(c)(ii)(C); 40 CFR 125.100-.104)	<ul style="list-style-type: none"> • Soil removal 	<ul style="list-style-type: none"> • Implementation of erosion and sedimentation controls (Section 8.4.5).
Massachusetts Air Pollution Control Requirements (310 CMR 7.09)	<ul style="list-style-type: none"> • Soil removal 	<ul style="list-style-type: none"> • Implementation of dust control measures (as necessary) and air monitoring (Sections 8.5.1 and 8.6).
TSCA Regulations (Storage for Disposal) (40 CFR 761.61; 40 CFR 761.65)	<ul style="list-style-type: none"> • Temporary storage of removed materials 	<ul style="list-style-type: none"> • Temporary storage of free product and liquids in tanks or containers at GE's existing on-plant tank system or hazardous waste storage facility, both of which meet the long-term PCB storage requirements of TSCA. • Temporary storage of drums and other equipment in containers at GE's existing on-plant hazardous waste storage facility, which meets the long-term PCB storage requirements of TSCA.
TSCA Regulations (PCB Marking Requirements) (40 CFR 761.40)	<ul style="list-style-type: none"> • Temporary storage of removed materials 	<ul style="list-style-type: none"> • Will be attained by marking PCB items in accordance with these requirements.
RCRA Hazardous Waste Regulations (Storage of Hazardous Waste) (40 CFR 264, Subparts I and J 40 CFR 262.34)	<ul style="list-style-type: none"> • Temporary storage of removed materials 	<ul style="list-style-type: none"> • Temporary storage of free product and liquids in tanks or containers at GE's existing on-plant tank system or hazardous waste storage facility, both of which meet the long-term PCB storage requirements of TSCA. • Temporary storage of drums and other equipment in containers at GE's existing on-plant hazardous waste storage facility. • Storage of materials in tanks will be limited to 90 days or less and will meet the substantive requirements for up to 90-day accumulation in tanks. • Materials in containers will be stored at GE's hazardous waste storage facility, which meets the requirements for long-term storage of hazardous waste in containers.

ARAR	Associated Project Components	Means by Which ARAR Will Be Addressed
RCRA Hazardous Waste Management/Disposal Facilities Regulations (Preparedness and Prevention) (40 CFR 264, Subpart C)	<ul style="list-style-type: none"> • Temporary storage of removed materials 	<ul style="list-style-type: none"> • GE's existing on-plant hazardous waste storage facility meets these requirements.
RCRA Hazardous Waste Management/Disposal Facilities Regulations (General) (40 CFR 264.13 - .19)	<ul style="list-style-type: none"> • Temporary storage of removed materials 	<ul style="list-style-type: none"> • Operation of GE's existing on-plant hazardous waste storage facility meets these requirements.
RCRA Hazardous Waste Management/Disposal Facilities Regulations (Closure) (40 CFR 264.111 - .115)	<ul style="list-style-type: none"> • Temporary storage of removed materials 	<ul style="list-style-type: none"> • Upon termination of operations, GE's existing on-plant hazardous waste storage facility will be closed in accordance with the substantive requirements of these regulations.
Massachusetts Hazardous Waste Regulations (Storage of Hazardous Waste) (310 CMR 30.680, 30.690, 30.340)	<ul style="list-style-type: none"> • Temporary storage of removed materials 	<ul style="list-style-type: none"> • See discussion of Federal RCRA Hazardous Waste Regulations (Storage of Hazardous Waste) above.
Massachusetts Hazardous Waste Regulations (Closure) (310 CMR 30.580)	<ul style="list-style-type: none"> • Temporary storage of removed materials 	<ul style="list-style-type: none"> • See discussion of Federal RCRA Hazardous Waste Regulations (Closure) above.
ARARs Relating to Disposition of Excavated Materials in OPCAs	<ul style="list-style-type: none"> • Permanent consolidation of removed materials at OPCAs 	<ul style="list-style-type: none"> • Refer to August 25, 1999 letter from GE to EPA re: <i>Supplemental Addendum to June 1999 Detailed Work Plan</i>, for relevant ARARs relating to disposition of excavated material at the OPCAs and means of addressing such ARARs.
TSCA Spill Cleanup Policy (40 CFR 761, Subpart G)	<ul style="list-style-type: none"> • New PCB spills (if any) during on-site activities 	<ul style="list-style-type: none"> • GE will consider and address cleanup policy for any new PCB spills that occur during the work.

ARAR	Associated Project Components	Means by Which ARAR Will Be Addressed
<p>Executive Order for Floodplain Management [Exec. Order 11988 (1977); 40 CFR Part 6, App. A; 40 CFR 6.302(b)]</p>	<ul style="list-style-type: none"> • Soil removal activities in floodplain 	<ul style="list-style-type: none"> • No practical alternative with less adverse impact on floodplain. • Implementation of erosion and sedimentation controls (Section 8.4.5). • Excavation and backfill/restoration will be conducted in a manner to avoid a loss in flood storage capacity (Section 6.6). • Restoration of habitat (Section 8.5.6).
<p>Massachusetts Wetlands Protection Act and Regulations [MGL c. 131 §40; 310 CMR 10.53(3)(q); 310 CMR 10.54 - .58]</p>	<ul style="list-style-type: none"> • Soil removal • Placement of fill materials within 100-year floodplain 	<ul style="list-style-type: none"> • No practical alternative with less adverse impact on resource areas. • All practical measures will be taken to minimize adverse impact on river. • Implementation of erosion and sedimentation controls (Section 8.4.5). • Excavation and backfill/restoration will be conducted in a manner to avoid a loss in flood storage capacity (Section 6.6). • Restoration of disturbed vegetation (Section 8.5.6).

7. Contractor Selection

Prior to conducting the planned Removal Action as described above, GE will select a Remediation Contractor that is qualified to complete the on-site soil remediation/construction activities. GE anticipates selecting a Remediation Contractor on or about July 8, 2005.

Upon selection, the Remediation Contractor will be responsible for providing several submittals to GE, including those identified in Section 8.3 of this Work Plan. GE will subsequently provide the Contractor information and submittals to EPA in a supplemental information package, as described in Section 10 of this Work Plan.

8. Implementation Plan

8.1 General

As indicated in Section 6.2, the POP contains a series of plans that address several common aspects for Removal Actions Outside the River. As relevant, those plans will be followed during implementation of the Removal Action associated with the Group 3C and 3D floodplain properties.

As a supplement to the implementation-related procedures specified in the POP plans, this section provides additional details regarding certain construction activities. Specifically, this section identifies the requirements for project-specific plans to be submitted by the selected Remediation Contractor, describes site-specific elements of the site preparation and construction activities, and summarizes the project-specific perimeter air monitoring approach.

8.2 Project Participants

To the extent possible, the following table identifies the key project participants involved in the design and implementation of the remediation/construction activities summarized herein, along with their project roles and contact information:

Organization/Contact	Role	Address and Phone Number
United States Environmental Protection Agency William P. Lovely, Jr.	<ul style="list-style-type: none"> - Lead regulatory agency. - Review and approval of Final Work Plan. - Oversight of Removal Actions. 	USEPA Region 1 One Congress Street, Suite 1100 Boston, MA 02114-2023 (617) 918-1240
General Electric Company Richard W. Gates	<ul style="list-style-type: none"> - Supervise pre-design, construction, and documentation activities related to the Phase 3, Group 3C and 3D Floodplain Properties Removal Action. - Supervise implementation of the Removal Action and related activities to ensure they are conducted in accordance with the CD. - Direct/coordinate activities of the Remediation Contractor and other GE-contracted organizations. - Responsible for preparation of a Final Completion Report. 	General Electric Company 159 Plastics Avenue Building 59 Pittsfield, MA 01201 (413) 448-5909

Organization/Contact	Role	Address and Phone Number
Blasland, Bouck & Lee, Inc. James M. Nuss, P.E., LSP	<ul style="list-style-type: none"> - Supervising Remediation Contractor for GE. - Review Remediation Contractor submittals. - Project coordination and documentation. - Provide technical assistance related to implementation of the Removal Action. - Assist in verifying that the Removal Action is complete and performed in accordance with the Work Plan. - Prepare Final Completion Report. 	Blasland, Bouck & Lee, Inc. 6723 Towpath Road Syracuse, NY 13214 (315) 446-9120
Berkshire Environmental Consultants, Inc. Maura Hawkins	<ul style="list-style-type: none"> - Design and implement perimeter air monitoring in conjunction with construction activities. 	Berkshire Environmental Consultants, Inc. 152 North Street, Suite 250 Pittsfield, MA 01201 (413) 443-0130
Remediation Contractor (To be determined)	<ul style="list-style-type: none"> - Implement all construction-related activities. 	(To be determined)

8.3 Contractor Submittals

Once selected, the Remediation Contractor will be required to provide certain pre-mobilization submittals to demonstrate that the Contractor: (a) has an adequate understanding of the scope of the Removal Action; (b) has developed a project-specific sequence that can efficiently perform all on-site activities within the allowable schedule; (c) will utilize acceptable materials, products, and procedures; and (d) will perform all activities in a manner that is protective of on-site workers and the surrounding community. Certain of those submittals relate to the manner in which the work activities will be implemented and, as such, will supplement the information and procedures presented in this Work Plan. Those submittals include an Operations Plan, Health and Safety Plan (HASP), and Contingency Plan. Each of these submittals is further described below.

Operations Plan

The purpose of the Operations Plan is to summarize the materials, procedures, timelines, and controls that the Contractor intends to utilize during project activities. This plan will be prepared in consultation with GE and its Supervising Contractor and will include the following:

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- List of equipment to be used on site;
 - Residential property protection procedures;
 - Work Schedule;
 - The Contractor's proposed plan for controlling vehicular and pedestrian traffic during the performance of construction activities;
 - Proposed excavation stabilization measures (if any);
 - The Contractor's qualifications package (if requested by GE);
 - Stormwater (including run-on and run-off), erosion, noise, and dust control measures;
 - The Contractor's proposed excavation approach;
 - Materials handling and staging approach; and
 - Equipment cleaning procedures.

HASP

The HASP will identify the Remediation Contractor's project-specific health and safety procedures and will be developed to address the minimum requirements established in the POP and 29 CFR 1910 and 1926. The plan will address those activities to be undertaken by the Contractor and present required information including, but not limited to, the following (as applicable):

- Training;
- Identification of key personnel (including the Contractor's Health and Safety Officer);
- Medical surveillance;
- Site hazards;
- Work zones;
- Personal safety equipment and protective clothing;
- Personal air monitoring;
- Personnel/equipment cleaning;
- Confined space entry;
- Construction safety procedures;
- Standard operating procedures and safety programs; and
- Material safety data sheets.

Contingency Plan

The Contingency Plan will set forth procedures for responding to emergency conditions or events that may occur during the performance of the Removal Action, and will include the following information:

- A spill prevention control and countermeasures plan for all materials brought on the work site;
- Emergency vehicular access/egress;
- Evacuation procedures of personnel from the work site;
- For work sites that include or are adjacent to a surface water drainageway, a flood control contingency plan identifying measures to protect the work site(s) and the waterway from impact in the event of high water and/or flood conditions;
- A list of all contact personnel, with phone numbers and procedures for notifying each;
- Routes to local hospitals; and
- Identification of responsible personnel who will be in a position at all times to receive incoming phone calls and to dispatch Contractor personnel and equipment in the event of an emergency situation.

In addition to the required pre-mobilization document submittals specified above, the Remediation Contractor will be required to prepare a submittal(s) specifying the sources and, if necessary, the corresponding analytical data for proposed backfill sources to be used during the performance of this project.

Once developed by the selected Remediation Contractor and approved by GE, each of the above-listed Contractor submittals will be submitted to EPA in a supplemental information package. In addition to these submittals, the Contractor is required to provide GE with various other submittals over the course of this project. The overall purpose of such submittals is to verify that the materials and procedures used in the construction activities are consistent with the design of the Removal Action. In accordance with the POP, all Contractor submittals will be tracked to confirm their receipt and approval. A copy of the Technical Submittal Register is provided in Appendix E. (Please note that submittals required by GE but not subject to submittal to EPA as part of the supplemental information package have been shaded.)

8.4 Site Preparation

General site preparation activities for the Group 3C and 3D floodplain properties are shown on Technical Drawings 3 and 4, respectively (Appendix A). Immediately prior to or following mobilization to the work area,

the selected Remediation Contractor will perform several site preparation activities to establish the necessary site controls, features, and procedures for subsequent implementation of the construction activities. These activities include the following:

- Obtaining utility clearances;
- Establishing site controls and access;
- Site survey and layout;
- Installing erosion and sedimentation control measures; and
- Surface preparation.

General information regarding various site preparation activities (e.g., coordinating with local utilities, permitting, verifying existing conditions, establishing work areas, etc.) is provided in the general CQAP (part of the POP); the information provided below supplements that CQAP by providing additional site-specific details associated with certain of these activities.

8.4.1 Utility Clearances

Aboveground and underground utilities that could potentially be affected by the construction activities will be identified prior to initiating any intrusive subsurface activities (e.g., soil excavation, etc.). As indicated on Technical Drawings 1 and 2, certain above-ground and subsurface utilities are known to be present within and adjacent to the Group 3C and 3D floodplain properties. Subsurface utilities include sanitary and storm sewer lines, and aboveground utilities include any overhead power lines located on each of the parcels. The selected Contractor will be responsible for coordinating with DIGSAFE to determine the locations of all utilities at the start of the work and coordinating with the owners of the utilities regarding relocation/termination of any utilities, as required.

8.4.2 Work Area Security

The level of work area security will depend on the activities being performed and the location of those activities. Security measures will be selected in consultation with the Remediation Contractor and may consist of temporary fencing or barriers, maintenance of sign-in/sign-out sheets, and implementation of safe work

practices, as described below. In addition, GE will coordinate with EPA throughout the performance of response actions regarding security implementation.

Temporary Fencing - Temporary construction fencing will be installed, as needed, to delineate and secure areas during ongoing construction activities. While other fencing configurations of equivalent performance may be considered, such temporary fencing is expected to be at least 4 feet in height, constructed of high-density polyethylene, and orange in color.

Sign-In/Sign-Out Sheet - For the duration of construction activities, a sign-in/sign-out sheet will be maintained for the work site. All on-site personnel and visitors will be required to sign in upon entering the work area and sign out upon leaving.

Safe work practices will also be employed at this work site. These activities may include any of the following:

Daily Safety Meetings - Such meetings, commonly referred to as tailgate meetings, are typically held with the Contractor to discuss hazards potentially encountered during the planned daily activities.

Posting of Warning Tape - To restrict access during construction activities, warning tape may be installed at locations to delineate certain areas, such as the exclusion zone, contaminant reduction zone, and/or support zone.

Use of Flagmen or Other Signaling Devices - Certain excavation activities in high traffic areas may necessitate the use of flagmen or other signaling devices (i.e., flashing beacons mounted on sawhorses).

8.4.3 “Clean” Access Area

Since a number of activities will require periodic access/egress between the work site and adjacent areas, a “clean” transition area will be established. Such an area will be used for equipment/material delivery and for the positioning of trucks for subsequent loading and off-site transport of excavated materials. It is expected that each transport area will be constructed of gravel or a layer of geotextile fabric and will be properly delineated from the remainder of the property. The specific location and construction of the access area will be developed by the Remediation Contractor in accordance with the anticipated progression of the construction actions, as well as other factors such as the layout of the site, traffic patterns, and material handling procedures.

8.4.4 Survey Control

In accordance with the CQAP, survey controls will be established at the start of the work and maintained throughout the construction activities. GE will provide survey benchmarks so that the Remediation Contractor can establish appropriate horizontal and vertical control consistent with the existing survey data. As stated in the CQAP, the Remediation Contractor will establish a minimum 50-foot control grid within the Group 3C and 3D floodplain properties. This survey will be performed to verify that the horizontal and vertical limits of removals have been obtained and the final surface grade has been achieved.

8.4.5 Erosion and Sedimentation Control Measures

Erosion and sedimentation control measures will be implemented to minimize the potential for erosion of exposed soils and subsequent accumulation of materials in site drainage pathways. In addition, these measures will be used to divert rainfall runoff from entering work areas and open excavations.

For these groups of floodplain properties, erosion control measures to be implemented will include placement of hay bales and/or staked silt fencing along the downhill side of the work areas, plus additional area-specific measures, as required. The approximate location and layout of the hay bales/siltation fencing are indicated on Technical Drawings 3 and 4. Fencing will be placed at the start of the site work activities and will be maintained until a good stand of vegetation is established. In addition to the hay bale/silt fence, other erosion and sedimentation control measures will be implemented as needed.

8.4.6 Surface Preparation

Various surface preparation activities will be performed prior to or in conjunction with the initial site preparation activities. These surface preparation activities are specified on Technical Drawings 3 and 4.

8.5 Construction Activities

8.5.1 Soil Removal and Material Handling

The proposed Removal Actions will require excavation and handling of certain existing soils within the Group 3C and 3D floodplain properties. Specifically, existing soils within the excavation limits and depths, as depicted

on Technical Drawings 5 and 6, will be removed using conventional construction equipment (e.g., excavator, backhoe, and loader). The maximum depth of excavation will be approximately 6 feet below ground surface (bgs). The Contractor shall ensure that no free liquids are present within excavated materials prior to being transported/disposed at the appropriate OPCA.

As soils are excavated and prior to their transport to the appropriate OPCA, a number of intermediate on-site handling activities may be necessary. To ensure that such activities are performed in a manner that minimizes the potential for inadvertent releases to the environment, unsafe conditions for on-site and off-site personnel, and delays or complications in project completion, several on-site material handling procedures will be implemented. The specific method(s) of handling the removed soils will be based on, but not limited to, the following considerations:

- The characteristics of the excavated soils and corresponding disposition requirements;
- The locations from which the materials are removed and their proximity to the loading area(s); and
- The overall sequence and schedule of the Removal Actions.

To reduce the potential for the release of PCBs or other Appendix IX+3 constituents to the environment during removal and handling activities, the number of times that the excavated material is handled will be kept to a minimum. To accomplish this, the Remediation Contractor will conduct direct loading to trucks to the extent practical. Additional information regarding material handling is discussed below.

- To reduce the potential for migration of PCBs or other Appendix IX+3 constituents due to wind- and rainfall-related factors, work areas where excavation activities are yet to be completed will be protected with a cover (e.g., polyethylene sheeting) which will be anchored when the area is not under active excavation/use. In addition, if concerns regarding airborne dust are identified or suspected, water will be sprayed to keep the open excavation (or excavated soils) moist.
- To the extent feasible and practicable, material handling and loading areas will not be established in locations that may interfere with construction operations or necessary traffic flow. In addition, material handling areas will be located so as to take into account site topography and avoid (to the extent possible) low-lying drainage areas where surface runoff is likely to accumulate.

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- Additional erosion and sedimentation control measures (e.g., hay bales and geotextile fencing) will be utilized as necessary.

Based on the specified soil removal limits identified on Technical Drawings 5 and 6, the total volume of existing materials to be removed from the Group 3C and 3D floodplain properties is approximately 4,220 in-situ cubic yards. Based on a review of the analytical results collected from within these removal limits during previous investigations, GE has determined that soils removed as part of the activities described herein will be subject to placement in either the Building 71 OPCA or the Hill 78 OPCA. Additional information regarding the transport and disposition of excavated materials is provided below in Section 8.5.2.

8.5.2 Transport and Disposition of Excavated Materials and Remediation-Derived Waste

As indicated above, all excavated materials will be consolidated in GE's OPCAs, excluding items (if any) that are prohibited for disposition at the OPCAs under the CD and SOW. Previous sampling and analysis conducted for soils at the Group 3C and 3D floodplain properties indicate that soils at certain of the sampling locations that represent the areas where soil will be excavated either have PCB concentrations over 50 ppm and thus are regulated for disposal under TSCA, or appear to have concentrations of other constituents that would cause them to constitute characteristic hazardous waste under RCRA. These excavated soils will be transported to and consolidated at the Building 71 OPCA, which is authorized to receive TSCA- and RCRA-regulated material. Soils not regulated under TSCA and RCRA will be transported to and consolidated at the Hill 78 OPCA. Technical Drawings 5 and 6 provide the limits of soils to be transported to and consolidated at the Building 71 and Hill 78 OPCAs.

The transportation of excavated materials from the Group 3C and 3D floodplain properties to the OPCAs will utilize the primary route shown on Figure 8-1 (or, if that route cannot be used, the secondary route shown on Figure 8-1 or an alternate route proposed by GE for EPA approval). Based on review of these routes and discussion with EPA, such transport will be considered to occur "on-site" within the meaning of Paragraph 9.a of the CD, and thus will be subject to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) on-site permitting exemption referenced in Paragraph 9.a of the CD. In these circumstances, site-specific transportation procedures have been developed for this Removal Action, as listed below.

The Remediation Contractor will be required to implement the following procedures for the transport of excavated materials from the Group 3C and 3D floodplain properties to the appropriate OPCA:

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- Employ qualified personnel trained per U.S. Department of Transportation (DOT) requirements for handling and shipping hazardous materials, with such training to include general safety, emergency response, exposure protection, accident prevention, preparation of shipping papers, and securing loads.
 - Employ drivers that have a Commercial Driver's License (CDL) with a Hazardous Materials Endorsement.
 - Utilize trucks that are DOT-inspected.
 - Include in its HASP, Operations Plan, and Contingency Plan detailed provisions for responding to transportation emergencies such as spills, releases, or other incidents.
 - Maintain records of the number of loads of materials sent to the OPCAs on a daily basis.
 - Confirm that the materials are suitable for transport (i.e., no free liquids).

The transport of excavated materials from the Group 3C and 3D floodplain properties to the appropriate OPCA will be conducted in accordance with the following guidelines:

- After a safety check of the truck, the truck bed will be lined with polyethylene. Excavated soil will be placed in the truck and the load will be covered.
- A Hazardous Materials Bill of Lading (BOL) will be prepared and signed by the truck driver. The DOT shipping description to be used on the BOL will be:

“RQ, Polychlorinated biphenyls, mixture, 9, UN 2315, PG 111, RQ”

- After another safety check of the vehicle and placarding, the truck will leave the site and proceed to the appropriate OPCA utilizing the primary route shown on Figure 8-1. If, for some reason, the primary route is not used, the secondary route shown on Figure 8-1 (or an alternate route to be proposed by GE to EPA) will be used.
- Upon arrival of the truck at the appropriate OPCA, the OPCA Contractor will document receipt of the load and the material will be off-loaded and placed by the OPCA Contractor.

8.5.3 Backfilling of Excavations

Backfilling operations will be initiated as soon as practicable after completion and proper documentation of excavation activities (i.e., survey control). It is anticipated that the excavations will be backfilled and compacted using conventional construction equipment. Clean backfill materials will be placed in 8-inch-thick lifts in a loose state and compacted in accordance with the Technical Specifications (Appendix D) prior to additional fill being placed within the excavation. The excavation will be brought up to the predetermined subgrade elevation prior to installing the final surface layer (e.g., topsoil, seed, and mulch).

Backfill material will be clean, natural material, no greater than gravel in size to ensure proper settlement, permeability, and compactability. The specific fill sources to be used for this project will be identified by the Remediation Contractor. A description of the process for identifying such sources and, if necessary, submitting the analytical data for them was presented in Section 6.5.

8.5.4 Installation of Excavation Controls

For excavations extending to depths greater than 4 feet and which Contractor personnel will enter to perform work, excavation sidewall stabilization will be required, as discussed in Section 6.4. If the Remediation Contractor plans to install excavation controls to provide excavation stability and/or maintain the structural stability of any adjacent structures, such controls will be designed and stamped by a Professional Engineer licensed in the Commonwealth of Massachusetts.

8.5.5 Equipment Cleaning

Equipment and materials that have come into contact with existing soils at the Group 3C and 3D floodplain properties during the construction activities will be cleaned prior to relocation to an area outside the work zone (i.e., the excavation and loading areas), prior to handling backfill materials, and prior to its departure from the Group 3C and 3D floodplain properties. Equipment cleaning will be conducted as specified in Section 3.5 of the Site Management Plan in the POP.

8.5.6 Restoration of Disturbed Vegetation

This section pertains to the restoration of vegetated areas outside the removal limits. Prior to the initiation of remediation actions at the Group 3C and 3D floodplain properties, the Remediation Contractor will be required to perform an inventory of all existing trees and shrubs (i.e., type, quantity, size, etc.) located within the limits of the remediation actions. As indicated on Technical Drawings 7 and 8, vegetated surfaces will require the placement of 6 inches of topsoil followed by the placement of a seed mix and mulch to restore pre-excavation grades. A plan to address the replanting of trees and shrubs will be developed based on consultation with EPA and discussions with the property owners. GE will coordinate with EPA regarding the schedule and implementation of restoration activities.

8.6 Perimeter Air Monitoring

Ambient air monitoring for PCBs and particulate matter will be performed during the remediation actions. The scope of the ambient air monitoring program is presented in Appendix F to this Work Plan. In overview, ambient air monitoring for PCBs will include collection of ambient air samples using “high volume” samplers equipped with glass fiber filters and polyurethane foam (PUF) cartridges. The samples will be collected, analyzed, and evaluated using the procedures specified in EPA Compendium Method TO-4A. To obtain representative data on ambient levels of PCBs around the construction site before and during construction activities, two PCB air sampling events will be performed prior to the start of construction activities and additional events will be performed at least once every 4 weeks during the course of construction. Ambient air monitoring for particulates will be performed on a continuous basis during all active construction activities using real-time particulate air monitors.

The ambient air monitoring scope of work in Appendix F discusses the locations for the air monitoring. It preliminarily identifies five potential monitoring locations (shown on attached figures). For PCB air monitoring, that scope of work notes that PCB background monitoring will be conducted at four of those stations prior to any on-site soil remediation activity, and that during soil removal activities, monitoring will be conducted at three stations (which will differ for the soil removal activities at the two groups of properties). It indicates further that PCB monitoring will also be conducted at one appropriate background location on Longfellow Avenue in Pittsfield, Massachusetts. For particulate monitoring, the scope of work in Appendix F states that such monitoring will be conducted at three on-site locations during soil remediation activities, which may vary slightly as remediation activities progress; and it references the preliminary monitoring locations

shown on the attached figures as candidate locations for such monitoring. It also provides that background air monitoring for particulates will be conducted at the background station on Longview Terrace. The scope of work explains that the specific locations for the monitors will be selected based on the location and nature of the soil remediation activity, predominant wind direction, the location of potential receptors, the availability of power, site accessibility, and site security.

9. Post-Construction Activities

9.1 General

This section addresses the post-construction activities to be performed by GE at the Group 3C and 3D floodplain properties. These activities include project closeout activities (including preparation and submittal of a Final Completion Report) and Post-Removal Site Control activities.

9.2 Project Closeout – Pre-Certification Inspection and Completion Report

As provided in the EPA-approved RD/RA Work Plan for Group 3A and 3B of the 1½ Mile floodplain properties, GE will carry out the project close-out activities for all four groups of properties in Phase 3 of the 1½ Mile Floodplain RAAs together. Thus, once GE has determined that the Removal Action for the Phase 3 floodplain properties is complete (excluding Post-Removal Site Control activities) and the applicable Performance Standards have been attained for all groups within Phase 3, GE will schedule and conduct a pre-certification inspection with EPA and MDEP. This inspection will be conducted within 90 days after GE concludes that the Removal Action for Phase 3 is complete.

After the pre-certification inspection, GE will proceed with remaining closeout activities, which will consist of development and submittal of a Final Completion Report to summarize and document the scope of the completed Removal Action activities. At a minimum, the Final Completion Report will include the following:

- A description of the Removal Action performed;
- Identification of any deviations from the design submittals approved by EPA;
- A listing of Removal Action quantities, including soil volumes removed;
- Results of quality assurance/quality control (QA/QC) testing performed during the Removal Action;
- Survey data to document the current grade and final surface contours;

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- Copies of Record Drawings developed by the Contractor to document the as-built conditions;
 - Representative project photographs;
 - Documentation regarding the disposition of materials excavated in conjunction with the construction activities; and
 - A Post-Removal Site Control Plan and schedule (consistent with Section 9.3 below).

9.3 Post-Removal Site Control Activities

Post-construction inspection and maintenance (I/M) activities will be performed at the Group 3C and 3D floodplain properties, as required by Technical Attachment J to the SOW, at the frequencies and duration proposed below. Those I/M activities are described below.

9.3.1 Periodic Inspections

GE will initiate post-construction inspections of the restored surfaces at the Group 3C and 3D floodplain properties following completion of the construction activities. Such inspections will be performed for areas that were backfilled and restored.

For backfilled/restored areas, the first inspection will be performed approximately one month after completion of construction activities. Thereafter, these areas will be inspected every 6 months for a period of 2 years (subject to subsequent EPA approval of a different frequency). At a minimum, these inspections will include visual observations of the following: (a) erosion controls to verify their continued effectiveness until such time vegetation is sufficiently established; (b) any areas where excessive settlement has occurred relative to the surrounding areas; (c) any drainage or growth problems due to possible over-compaction of the backfill materials; and (d) other conditions that could jeopardize the completed remediation.

Inspections are anticipated to occur in May and October of each year to ensure that the vegetation is growing as anticipated and is providing the desired degree of erosion control.

9.3.2 Maintenance/Repair

In connection with the periodic inspections, GE will address any conditions that need maintenance or repair. Examples of maintenance/repair activities that may be identified and conducted as a result of the periodic inspections include, but are not limited to, placement of additional topsoil in areas of erosion or settlement and repair or replacement of any components of the backfilled/restored areas exhibiting deficiencies or potential problems. If needed, additional planting or seeding will be performed to replace dead or dying vegetation.

Any such conditions noted as a result of periodic inspections will be addressed as soon as practicable. The nature of the associated maintenance/repair will be documented in the subsequent inspection report.

9.3.3 Inspection Reporting

Following each inspection described in Section 9.3.1, an inspection report will be prepared and submitted to EPA. Each such report will document I/M activities performed since submittal of the previous inspection report. As required by Attachment J to the SOW, these reports will include the following information (as relevant):

- Description of the type and frequency of inspection and/or monitoring activities conducted;
- Description of any significant modifications to the inspection and/or monitoring program made since submittal of the preceding monitoring report;
- Description of any conditions or problems noted during the inspection and/or monitoring period which are affecting or may affect the completed remediation;
- Description of any corrective measures taken;
- Results of sampling analyses and screening (if any) conducted as part of the inspection and/or monitoring program (if any); and
- Description of any measures that may need to be performed to correct any conditions affecting the completed remediation.

10. Schedule

As described in Section 7, GE anticipates selecting a Remediation Contractor on or about July 8, 2005. GE proposes that, within 30 days of selection of a Remediation Contractor, GE will submit a supplemental information package to EPA as a follow-up to this RD/RA Work Plan. The supplemental information package is anticipated to include the following:

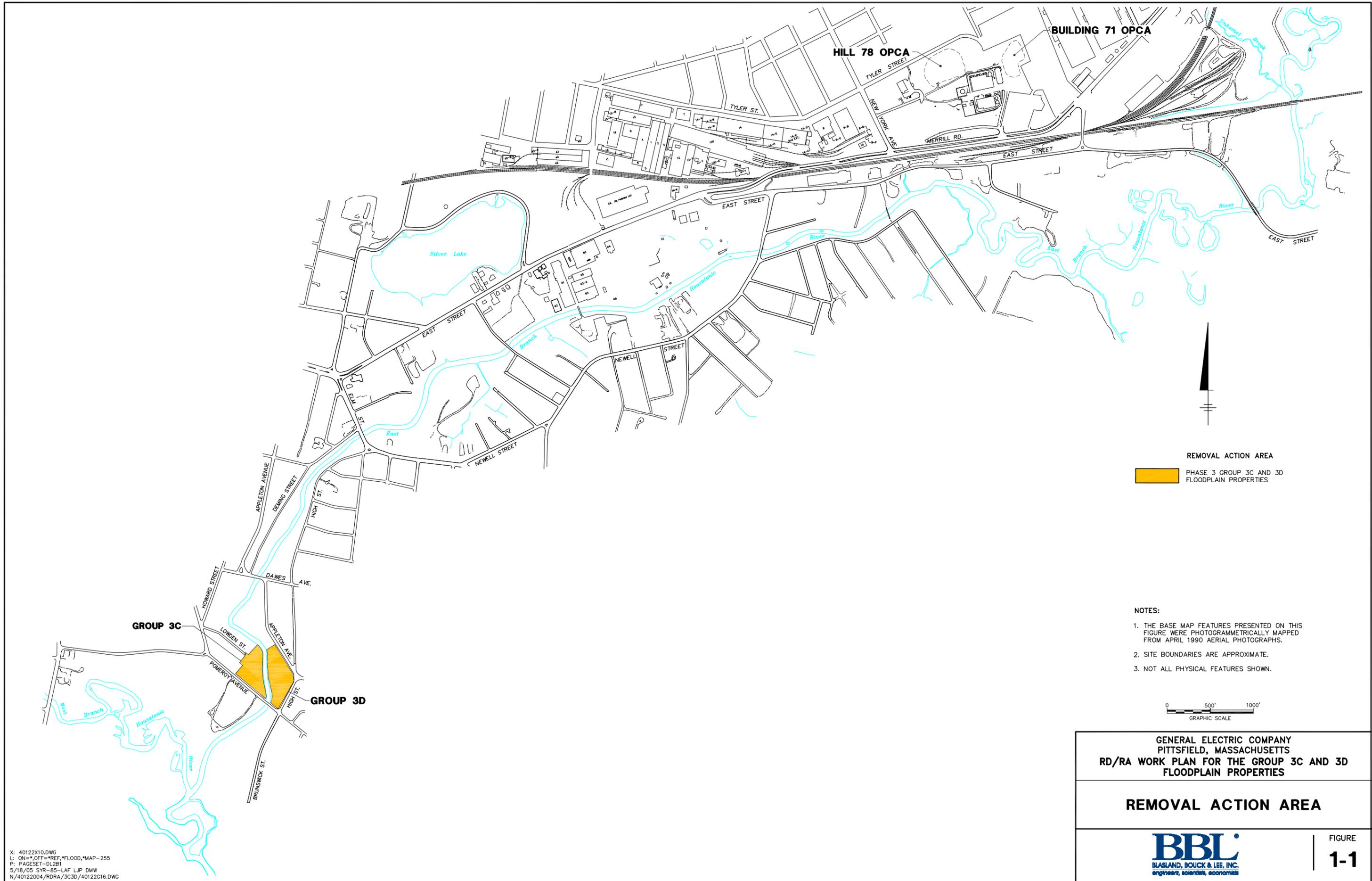
- Identification of and contact information for the selected Remediation Contractor;
- Copies of the Remediation Contractor's pre-mobilization submittals (i.e., Operations Plan, HASP, and Contingency Plan);
- Identification of backfill sources and locations; and
- Analytical data for samples collected from the backfill sources (unless the backfill sources have already been approved based on previously submitted analytical data).

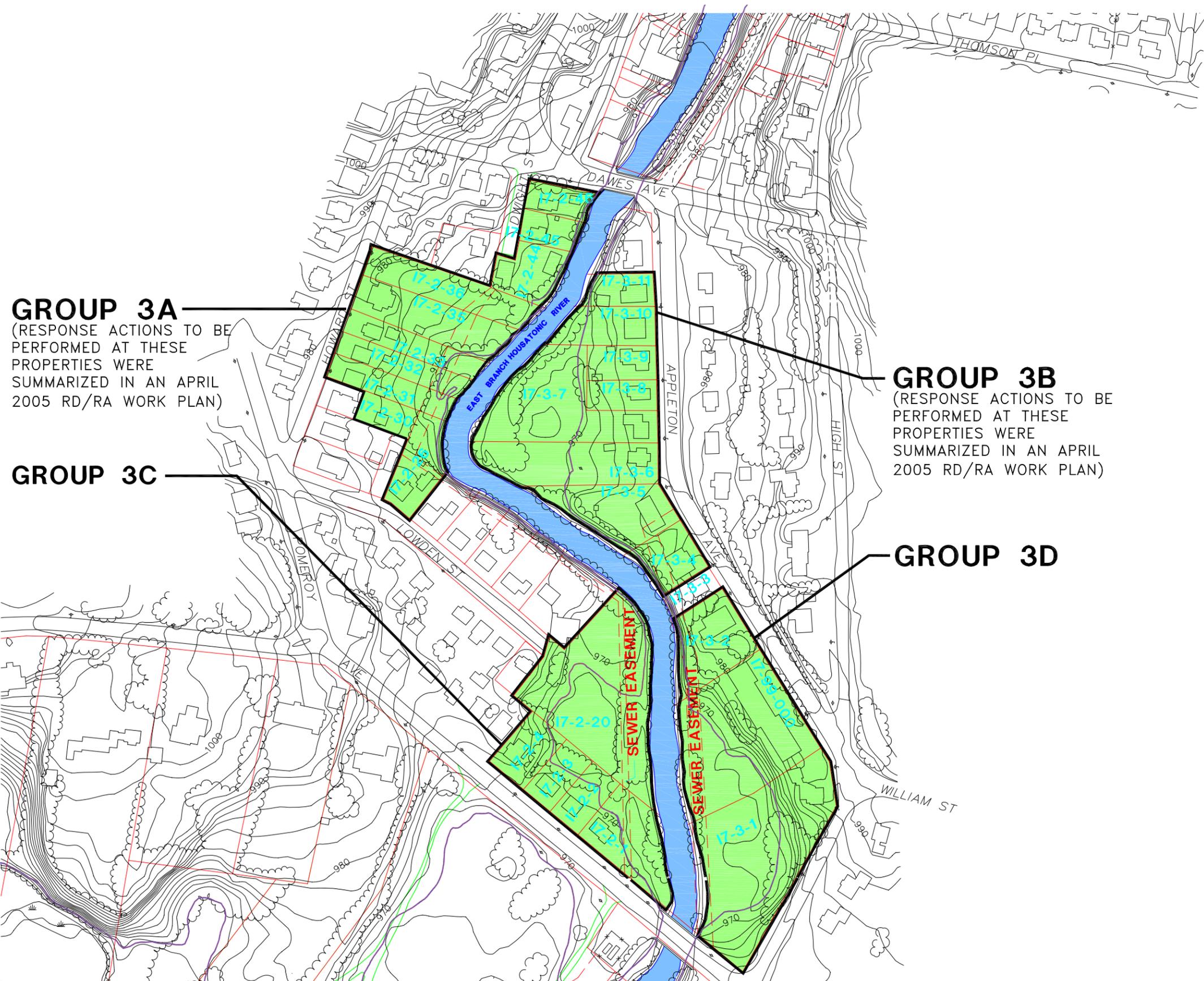
Following EPA approval of this RD/RA Work Plan and the supplemental information package, site preparation activities will be initiated. The specific schedule for the implementation and completion of the Removal Actions at this RAA will depend on several factors, including the timing of EPA approval of this Work Plan and the supplemental information package and receipt of the necessary access permission from non-GE property owners to conduct the proposed remediation actions at their properties. GE currently anticipates that it will be able to commence remediation activities at these properties during summer/fall 2005, and that such activities will be completed during the 2005 construction season. Additional details regarding overall project duration, including an estimate of the duration of the entire project in working weeks, will be provided in the Remediation Contractor's Work Schedule – which is a required component of the Contingency Plan submittal (Section 8.3) – to be provided to EPA as part of the forthcoming supplemental information package. With respect to access, if GE is unable to obtain access permission from particular property owners after using “best efforts” (as defined in the CD) to do so, it will so advise EPA and MDEP and seek their assistance in obtaining such access pursuant to Paragraph 60.f(i) of the CD. In addition, if issues relating to access may cause a delay in the completion of the remediation, GE will so advise EPA.

Within 90 days of completing the field construction activities at all the floodplain Phase 3 properties, GE will schedule and conduct a pre-certification inspection with EPA and MDEP, as described in Section 9.2. Within 30 days thereafter, or at such other time as proposed by GE and approved by EPA at the time of the inspection,

GE will submit a Final Completion Report on the Removal Action for Phase 3 of the 1½ Mile Floodplain RAAs. That report will represent completion of the CD-required construction activities at these properties. Periodic inspection reports will continue to be provided to EPA in accordance with the schedule outlined in Section 9.3.

Figures





GROUP 3A
 (RESPONSE ACTIONS TO BE PERFORMED AT THESE PROPERTIES WERE SUMMARIZED IN AN APRIL 2005 RD/RA WORK PLAN)

GROUP 3C

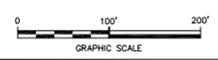
GROUP 3B
 (RESPONSE ACTIONS TO BE PERFORMED AT THESE PROPERTIES WERE SUMMARIZED IN AN APRIL 2005 RD/RA WORK PLAN)

GROUP 3D



- LEGEND**
- 10 YEAR FLOODPLAIN
 - PROPERTY BOUNDARY
 - EDGE OF WATER
 - PAVED ROADWAY
 - - - UNPAVED ROADWAY OR TRAIL
 - ~ VEGETATION
 - 17-3-6 PROPERTY ID
 - 1 1/2 MILE REACH
 - RESIDENTIAL FLOODPLAIN PROPERTIES - ACTUAL/POTENTIAL LAWN AREA, AS DESIGNATED IN SOW
 - 1000— INDEX ELEVATION CONTOUR

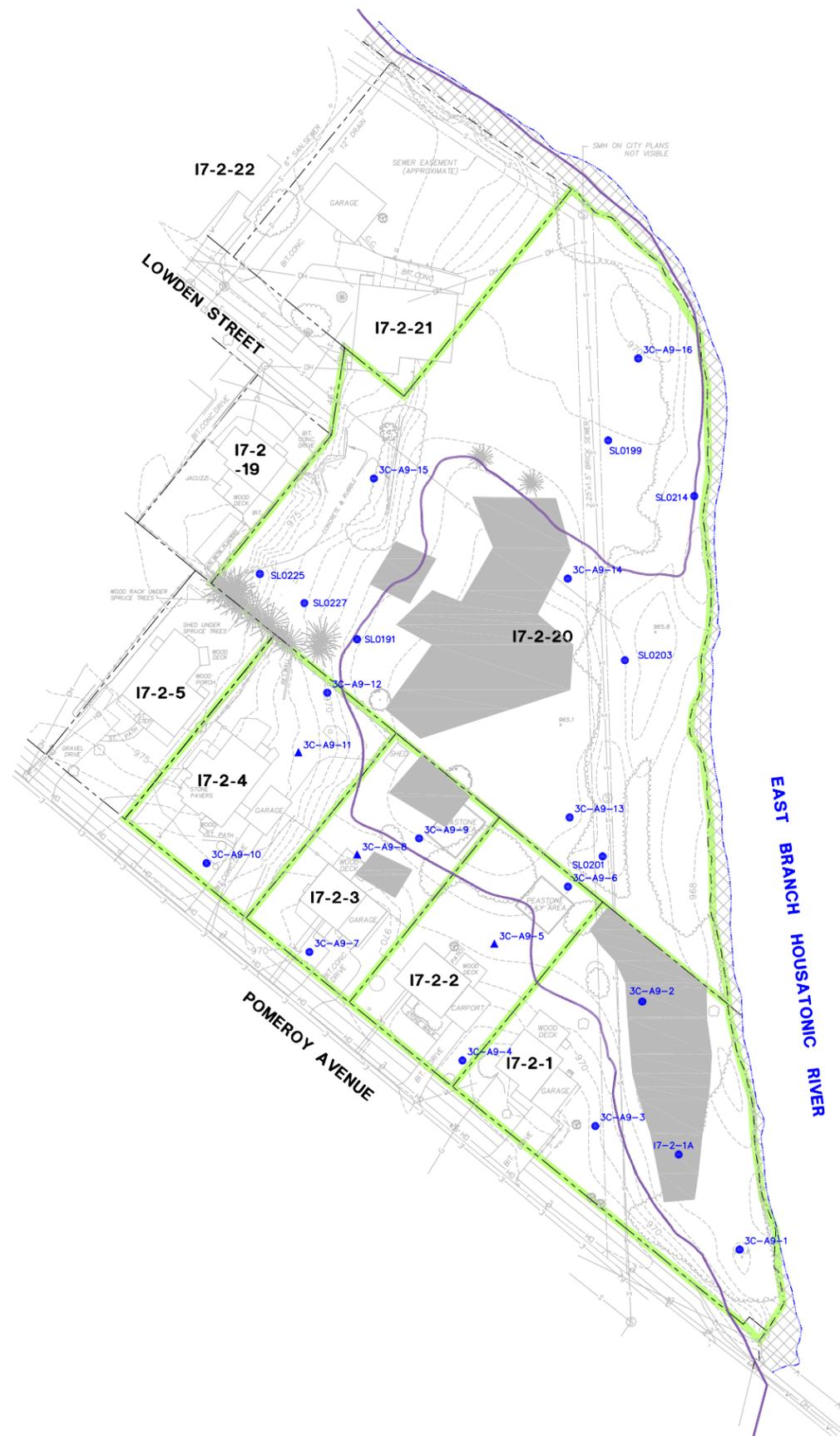
- NOTES:**
1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
 2. PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION.
 3. THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC., (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.



GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS
 RD/RA WORK PLAN FOR THE GROUP 3C AND 3D
 FLOODPLAIN PROPERTIES

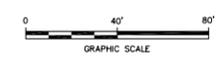
SITE PLAN





- LEGEND:**
- APPROXIMATE 10 YEAR FLOODPLAIN
 - - - - - APPROXIMATE PARCEL BOUNDARY
 - APPROXIMATE HORIZONTAL LIMITS OF AVERAGING AREA
 - AREA OF PRIOR EXCAVATION (TO DEPTHS RANGING BETWEEN 0.5 AND 1.0 FEET)
 - - - - - FENCELINE
 - 17-2-20** RESIDENTIAL PROPERTY PARCEL ID
 - ▲ 3C-A9-5 APPENDIX IX+3 SURFACE SOIL LOCATION
 - 3C-A9-1 APPENDIX IX+3 SOIL BORING LOCATION
 - - - - - BOUNDARY OF FLOODPLAIN PROPERTIES
 - AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
 - - - - - DRAIN LINE
 - - - - - GAS LINE
 - - - - - OVERHEAD ELECTRIC
 - - - - - SANITARY SEWER LINE
 - - - - - WATER LINE
 - - - - - 970 INDEX ELEVATION CONTOUR
 - - - - - INTERMEDIATE ELEVATION CONTOUR

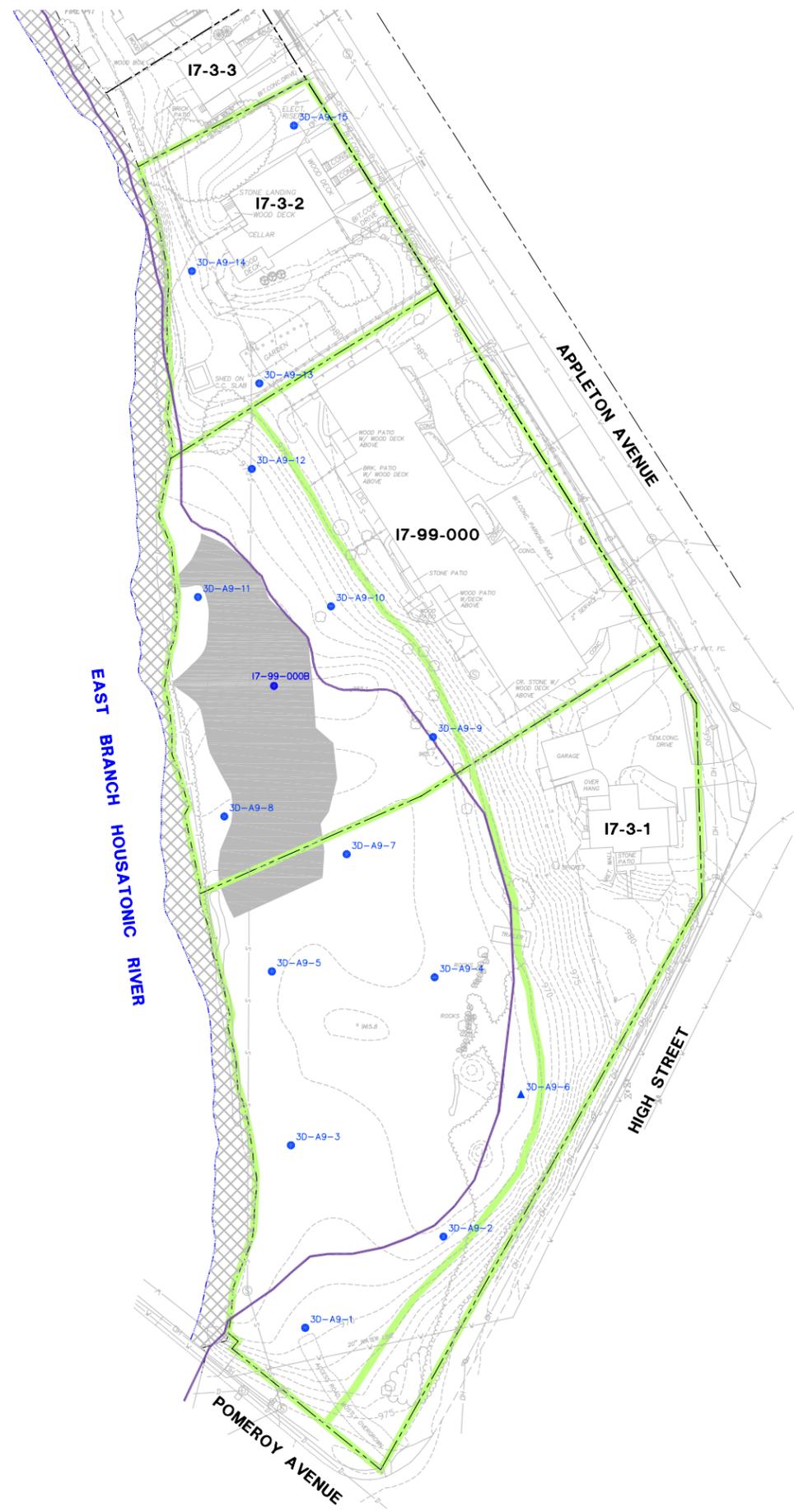
- NOTES:**
1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE FROM SURVEY BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, FILE NUMBER GE1091-001-CX101-M, DATED 11/24/04. SURVEY DATA BASED UPON AN AERIAL PHOTOGRAMMETRIC SURVEY DONE IN APRIL 2001 AND SUPPLEMENTED WITH FIELD SURVEY DONE BETWEEN OCTOBER AND NOVEMBER 2004.
 2. UTILITIES ARE SHOWN IN AN APPROXIMATED WAY ONLY AND ALL UTILITIES MAY NOT BE SHOWN.
 3. THE PARCELS SHOWN HEREON MAY BE SUBJECT TO RIGHTS AND EASEMENTS AS CONTAINED IN THE VARIOUS DEEDS OF RECORD DESCRIBING SAID PREMISES. ALL RIGHTS AND EASEMENT MAY NOT BE DEPICTED HEREON.
 4. THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.



GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS
RD/RA WORK PLAN FOR THE GROUP 3C AND 3D
FLOODPLAIN PROPERTIES

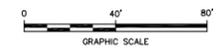
**SUMMARY OF EXISTING APPENDIX
IX+3 SOIL SAMPLING LOCATIONS
FOR GROUP 3C**





- LEGEND:**
- APPROXIMATE 10 YEAR FLOODPLAIN
 - APPROXIMATE PARCEL BOUNDARY
 - APPROXIMATE HORIZONTAL LIMITS OF AVERAGING AREA
 - AREA OF PRIOR EXCAVATION (TO DEPTHS RANGING BETWEEN 0.5 AND 1.25 FEET)
 - FENCELINE
 - 17-2-20** RESIDENTIAL PROPERTY PARCEL ID
 - 3D-A9-6 APPENDIX IX+3 SURFACE SOIL LOCATION
 - 17-99-000B APPENDIX IX+3 SOIL BORING LOCATION
 - BOUNDARY OF FLOODPLAIN PROPERTIES
 - AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
 - DRAIN LINE
 - GAS LINE
 - OVERHEAD ELECTRIC
 - SANITARY SEWER LINE
 - WATER LINE
 - INDEX ELEVATION CONTOUR
 - INTERMEDIATE ELEVATION CONTOUR

- NOTES:**
1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE FROM SURVEY BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, FILE NUMBER GE1091-001-CX101-M, DATED 11/24/04. SURVEY DATA BASED UPON AN AERIAL PHOTOGRAMMETRIC SURVEY DONE IN APRIL 2001 AND SUPPLEMENTED WITH FIELD SURVEY DONE BETWEEN OCTOBER AND NOVEMBER 2004.
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 3. THE PARCELS SHOWN HEREON MAY BE SUBJECT TO RIGHTS AND EASEMENTS AS CONTAINED IN THE VARIOUS DEEDS OF RECORD DESCRIBING SAID PREMISES. ALL RIGHTS AND EASEMENT MAY NOT BE DEPICTED HEREON.
 4. THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.

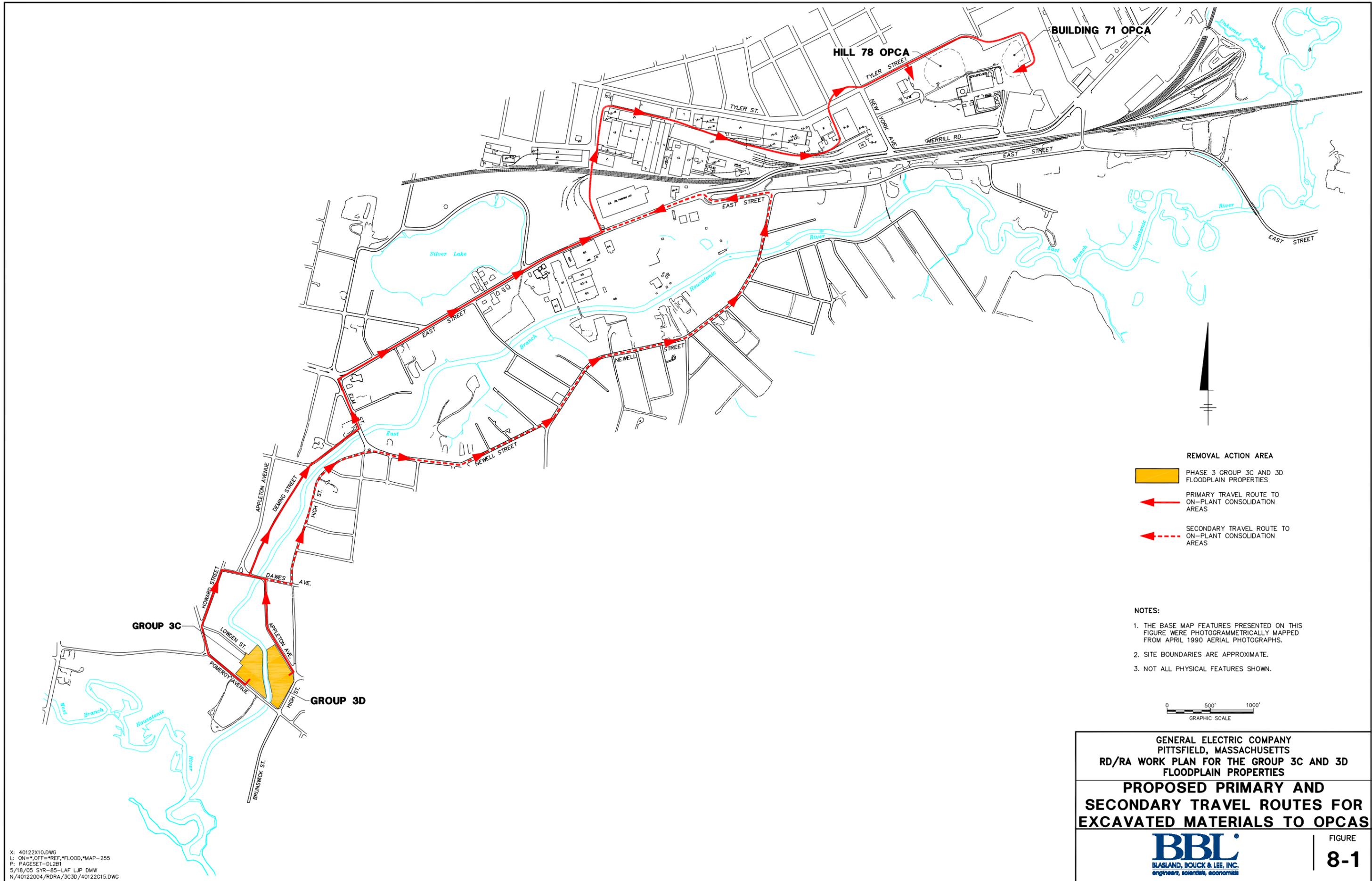


GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS
RD/RA WORK PLAN FOR THE GROUP 3C AND 3D
FLOODPLAIN PROPERTIES

**SUMMARY OF EXISTING APPENDIX
IX+3 SOIL SAMPLING LOCATIONS
FOR GROUP 3D**



FIGURE
2-2



X: 40122X10.DWG
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 N/40122004/RDRA/3C3D/40122G15.DWG

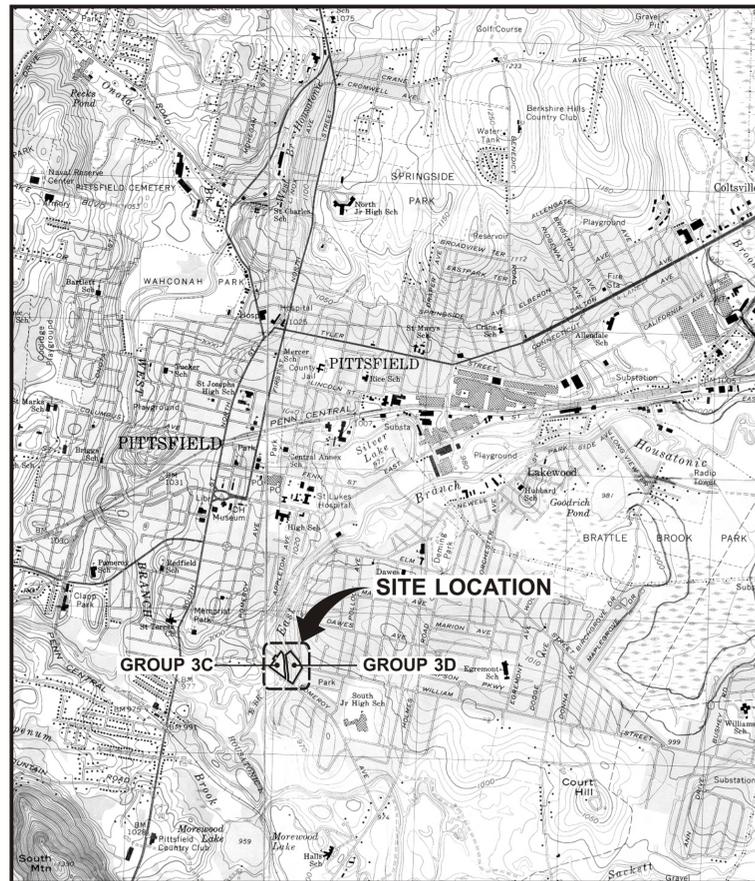
Appendices

Appendix A

Technical Drawings

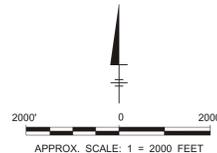
TECHNICAL DRAWINGS

PHASE 3 FLOODPLAIN PROPERTIES, GROUP 3C AND 3D REMOVAL ACTION AREA (RAA)



REFERENCE: Base Map Source: USGS 7.5 Min. Topo. Quads., Pittsfield West, Mass-New York and Pittsfield East, Mass., 1973.

LOCATION MAP



JUNE 2005

PREPARED FOR:



General Electric Company
Pittsfield, Massachusetts

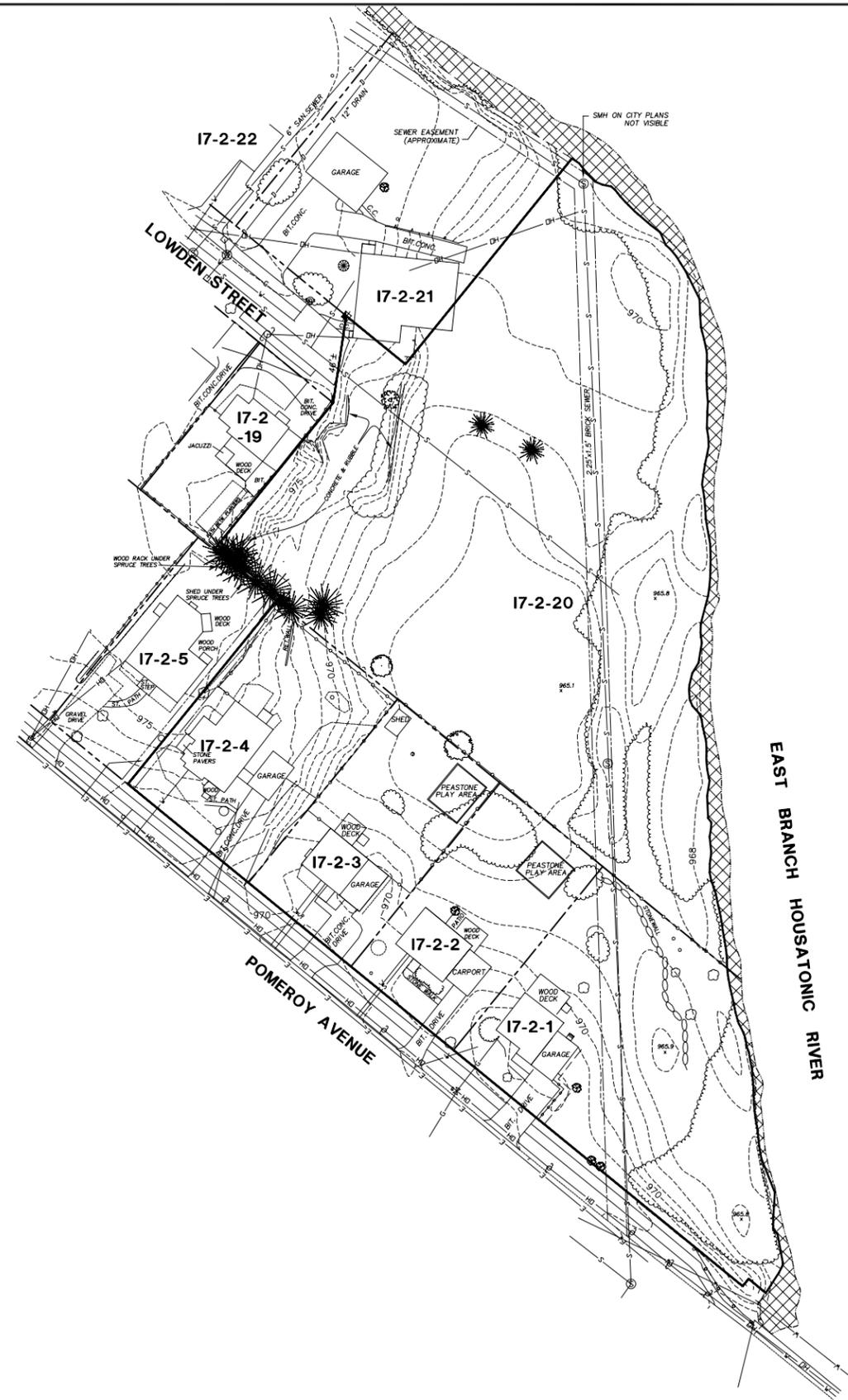
PREPARED BY:

BBL[®]
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

INDEX TO DRAWINGS

COVER SHEET

1. EXISTING SITE PLAN FOR GROUP 3C
2. EXISTING SITE PLAN FOR GROUP 3D
3. SITE PREPARATION PLAN FOR GROUP 3C
4. SITE PREPARATION PLAN FOR GROUP 3D
5. EXCAVATION LIMITS FOR GROUP 3C
6. EXCAVATION LIMITS FOR GROUP 3D
7. SITE RESTORATION PLAN FOR GROUP 3C
8. SITE RESTORATION PLAN FOR GROUP 3D
9. GENERAL NOTES AND DETAILS



LEGEND:

- APPROXIMATE PARCEL BOUNDARY
- 17-2-20** RESIDENTIAL PROPERTY PARCEL ID
- BOUNDARY OF FLOODPLAIN PROPERTIES (PORTION OF BOUNDARY ADJACENT TO RIVER INDICATES TOP OF BANK AS AGREED UPON BY GE AND EPA)
- AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
- EASEMENT LINE
- LIGHT POLE
- ⊕ UTILITY POLE
- CATCH BASIN
- ⊙ DRAIN MANHOLE
- ⊙ SANITARY MANHOLE
- ⊙ HYDRANT
- ⊕ WATER SHUTOFF
- EDGE OF WATER
- WOODEN FENCE
- CHAIN LINK FENCE
- WIRE FENCE
- GUARDRAIL
- GAS SERVICE
- WATER SERVICE
- SANITARY SEWER
- DRAINAGE
- UNDERGROUND ELECTRIC
- OVERHEAD WIRES (VARIOUS)
- EDGE OF BUSHES/HEDGE
- SHRUB
- CONIFEROUS TREES
- DECIDUOUS TREES
- 970--- INDEX ELEVATION CONTOUR
- INTERMEDIATE ELEVATION CONTOUR

NOTES:

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE FROM SURVEY BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, FILE NUMBER GE1091-001-CX101-M, DATED 11/24/04. SURVEY DATA BASED UPON AN AERIAL PHOTOGRAMMETRIC SURVEY DONE IN APRIL 2001 AND SUPPLEMENTED WITH FIELD SURVEY DONE BETWEEN OCTOBER AND NOVEMBER 2004.
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4. CONTRACTOR TO COORDINATE WITH "DIGSAFE" FOR LOCATIONS/IDENTIFYING UTILITIES. NO SITE WORK WILL BE PERFORMED BY THE CONTRACTOR UNTIL UTILITY INVESTIGATION BY "DIGSAFE" HAS BEEN COMPLETED.
5. EXISTING CONTOUR INTERVAL IS 1 FOOT.

X: 40122X00, X03.DWG
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 P: PAGESET/SYR-CDL
 6/13/05 SYR-85-DMW LAF GMS
 N/40122004/RDRA/3C3D/CONTRACT/40122G01.DWG

Graphic Scale
 1"=40'
 40' 0 40' 80'

THIS DRAWING WAS PREPARED AT THE SCALE INDICATED IN THE TITLE BLOCK. INACCURACIES IN THE STATED SCALE MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED.
 USE THE GRAPHIC SCALE BAR IN THE TITLE BLOCK TO DETERMINE THE ACTUAL SCALE OF THIS DRAWING.

No.	Date	Revisions	Init

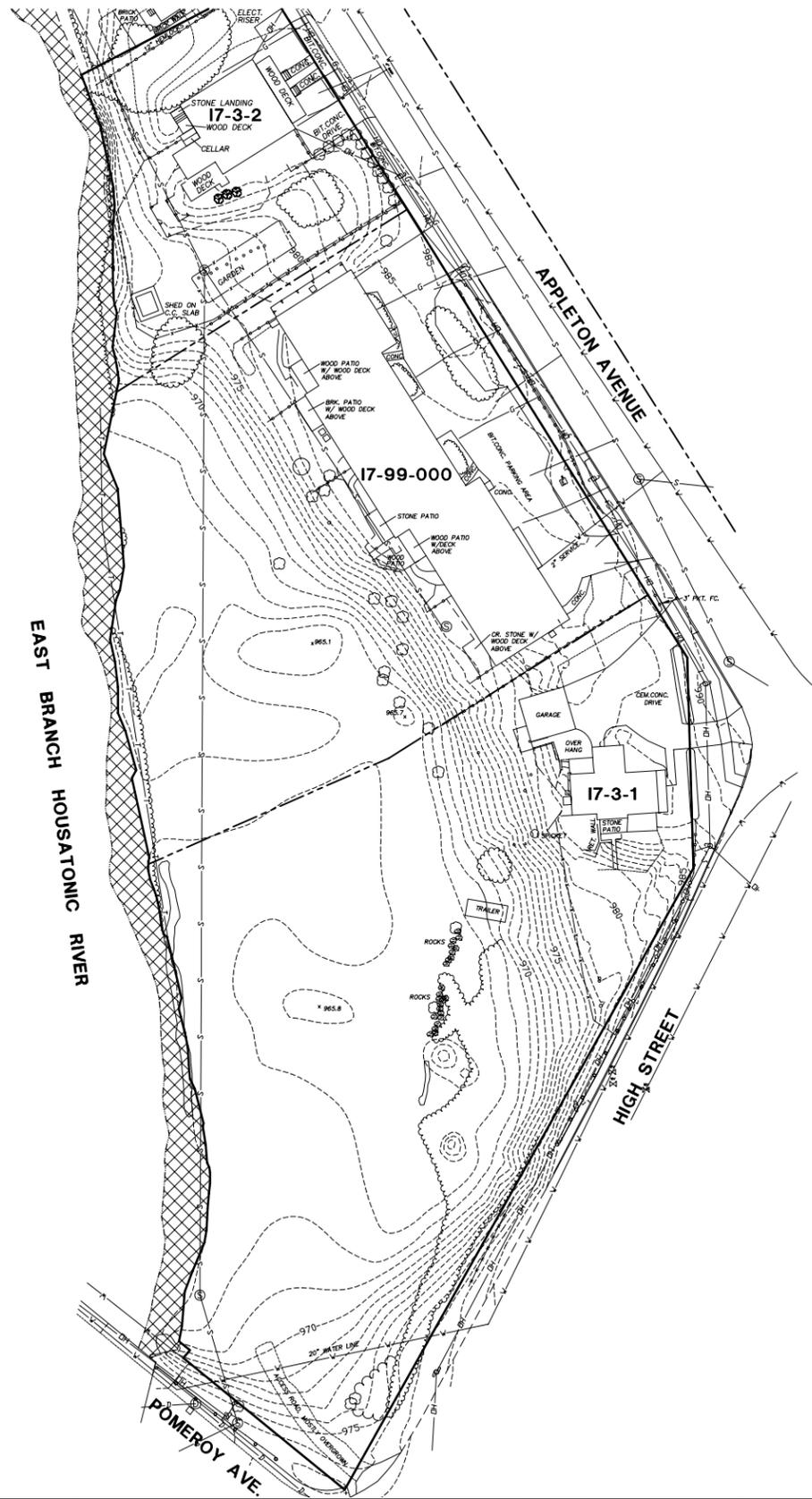
Professional Engineer's Name	
Professional Engineer's No.	
State	Date Signed
Project Mgr.	Designed by
ACC	DMW

GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
 RD/RA WORK PLAN FOR THE GROUP 3C AND 3D FLOODPLAIN PROPERTIES

EXISTING SITE PLAN FOR GROUP 3C

TECHNICAL DRAWINGS

BBL Project No. 401.22
Date JUNE 2005
Blasland, Bouck & Lee, Inc. Corporate Headquarters 6723 Towpath Road Syracuse, NY 13214 315-446-9120



LEGEND:

- APPROXIMATE PARCEL BOUNDARY
- 17-3-2** RESIDENTIAL PROPERTY PARCEL ID
- BOUNDARY OF FLOODPLAIN PROPERTIES (PORTION OF BOUNDARY ADJACENT TO RIVER INDICATES TOP OF BANK AS AGREED UPON BY GE AND EPA)
- ▨ AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
- EASEMENT LINE
- LIGHT POLE
- UTILITY POLE
- CATCH BASIN
- ⊙ DRAIN MANHOLE
- ⊙ SANITARY MANHOLE
- ⊙ HYDRANT
- ⊙ WATER SHUTOFF
- EDGE OF WATER
- WOODEN FENCE
- CHAIN LINK FENCE
- WIRE FENCE
- GUARDRAIL
- GAS SERVICE
- WATER SERVICE
- SANITARY SEWER
- DRAINAGE
- UNDERGROUND ELECTRIC
- OVERHEAD WIRES (VARIOUS)
- TELEPHONE
- EDGE OF BUSHES/HEDGE
- SHRUB
- CONIFEROUS TREES
- DECIDUOUS TREES
- 970 --- INDEX ELEVATION CONTOUR
- --- INTERMEDIATE ELEVATION CONTOUR

NOTES:

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE FROM SURVEY BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, FILE NUMBER GE1091-001-CX101-M, DATED 11/24/04. SURVEY DATA BASED UPON AN AERIAL PHOTOGRAMMETRIC SURVEY DONE IN APRIL 2001 AND SUPPLEMENTED WITH FIELD SURVEY DONE BETWEEN OCTOBER AND NOVEMBER 2004.
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4. CONTRACTOR TO COORDINATE WITH "DIGSAFE" FOR LOCATIONS/IDENTIFYING UTILITIES. NO SITE WORK WILL BE PERFORMED BY THE CONTRACTOR UNTIL UTILITY INVESTIGATION BY "DIGSAFE" HAS BEEN COMPLETED.
5. EXISTING CONTOUR INTERVAL IS 1 FOOT.

X: 40122X00, X03.DWG
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No.	Date	Revisions	Init

Professional Engineer's Name		
Professional Engineer's No.		
State	Date Signed	
Project Mgr.	Designed by	Drawn by
ACC		DMW

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GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
 RD/RA WORK PLAN FOR THE GROUP 3C AND 3D FLOODPLAIN PROPERTIES
EXISTING SITE PLAN FOR GROUP 3D
 TECHNICAL DRAWINGS

BBL Project No. 401.22
Date JUNE 2005
Blasland, Bouck & Lee, Inc. Corporate Headquarters 6723 Towpath Road Syracuse, NY 13214 315-446-9120



CONTRACTOR SHALL MOVE EXISTING FENCING TO ACCOMMODATE SOIL REMOVAL (SEE NOTE 3) AND REPLACE FENCING FOLLOWING RESPONSE ACTIONS (SEE FIGURE 7)

CONTRACTOR SHALL MOVE SHED TO ACCOMMODATE SOIL REMOVAL AND RESET SHED FOLLOWING RESPONSE ACTIONS (SEE FIGURE 7)

CONTRACTOR SHALL MOVE EXISTING FENCING TO ACCOMMODATE SOIL REMOVAL (SEE NOTE 3) AND REPLACE FENCING FOLLOWING RESPONSE ACTIONS (SEE FIGURE 7)

CONTRACTOR SHALL REMOVE PEASTONE PLAY AREA TO ACCOMMODATE SOIL REMOVAL AND REPLACE WITH NEW FOLLOWING RESPONSE ACTIONS (SEE FIGURE 7)

NOTE - ALTHOUGH NOT SHOWN ON DRAWING (FOR CLARITY PURPOSES), CONTRACTOR SHALL INSTALL A CONTINUOUS HAY BALE/SILT FENCE ROW ADJACENT TO AND ALONG THE ENTIRE EASTERN EDGE OF EXCAVATIONS ADJACENT TO THE RIVERBANK. THE SPECIFIC LOCATION OF THE HAY BALE/SILT FENCE SHALL BE FIELD DETERMINED AND APPROVED BY GE.

CONTRACTOR SHALL MOVE EXISTING FENCING TO ACCOMMODATE SOIL REMOVAL (SEE NOTE 3) AND REPLACE FENCING FOLLOWING RESPONSE ACTIONS (SEE FIGURE 7)

CONTRACTOR SHALL MOVE EXISTING STONE WALL TO ACCOMMODATE SOIL REMOVAL (SEE NOTE 3) AND REPLACE STONE WALL FOLLOWING RESPONSE ACTIONS (SEE FIGURE 7)



LEGEND:

- APPROXIMATE PARCEL BOUNDARY
- 17-2-20** RESIDENTIAL PROPERTY PARCEL ID
- BOUNDARY OF FLOODPLAIN PROPERTIES (PORTION OF BOUNDARY ADJACENT TO RIVER INDICATES TOP OF BANK AS AGREED UPON BY GE AND EPA)
- [Cross-hatched] AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
- EASEMENT LINE
- LIGHT POLE
- ⊕ UTILITY POLE
- CATCH BASIN
- ⊙ DRAIN MANHOLE
- ⊙ SANITARY MANHOLE
- ⊕ HYDRANT
- ⊕ WATER SHUTOFF
- EDGE OF WATER
- WOODEN FENCE
- CHAIN LINK FENCE
- WIRE FENCE
- GUARDRAIL
- GAS SERVICE
- WATER SERVICE
- SANITARY SEWER
- DRAINAGE
- UNDERGROUND ELECTRIC
- OVERHEAD WIRES (VARIOUS)
- EDGE OF BUSHES/HEDGE
- ⊙ SHRUB
- ⊙ CONIFEROUS TREES
- ⊙ DECIDUOUS TREES
- 970--- INDEX ELEVATION CONTOUR
- INTERMEDIATE ELEVATION CONTOUR
- HAY BALE/SILT FENCE (SEE NOTE 3)
- FENCE REMOVAL/REPLACEMENT (SEE NOTE 3)
- [Shaded] LIMITS OF SOIL REMOVAL

NOTES:

1. REFER TO DRAWING 1 FOR ADDITIONAL BASEMAP INFORMATION AND CONTRACTOR REQUIREMENTS.
2. EXISTING FEATURES WITHIN LIMITS OF SOIL REMOVAL THAT ARE REMOVED SHALL BE DISPOSED OF AT THE APPROPRIATE GE-OWNED OPCA BY CONTRACTOR. CERTAIN EXISTING FEATURES SHALL BE RECONSTRUCTED BY CONTRACTOR IN ACCORDANCE WITH DRAWINGS 5 AND 7.
3. UNLESS OTHERWISE NOTED, CONTRACTOR SHALL REMOVE FOR DISPOSAL AND REPLACE WITH NEW. ALL FENCE POSTS WITHIN LIMITS OF SOIL REMOVAL THE FENCE MAY BE REUSED IF APPROVED BY GE OR GE'S REPRESENTATIVE. ALL PORTIONS OF THE FENCE DEEMED UNUSABLE BY GE OR GE'S REPRESENTATIVE SHALL BE DISPOSED AND NEW SECTIONS OF FENCE SHALL BE INSTALLED BY CONTRACTOR.
4. AS NEEDED, CONTRACTOR SHALL PERFORM CLEARING AND GRUBBING ACTIVITIES IN AREAS SUBJECT TO RESPONSE ACTIONS (I.E., EXCAVATION AREAS).
5. AS PART OF SITE PREPARATION ACTIVITIES, THE CONTRACTOR SHALL INVENTORY ALL EXISTING TREES AND SHRUBS LOCATED WITHIN THE LIMITS OF EXCAVATION. THIS INVENTORY SHALL BE SUBMITTED TO GE OR GE'S REPRESENTATIVE PRIOR TO INITIATION OF SITE CLEARING ACTIVITIES.
6. MATERIALS AND DEBRIS REMOVED DURING THE IMPLEMENTATION OF RESPONSE ACTIONS WILL BE DISPOSED IN ACCORDANCE WITH THE SURROUNDING SOILS (AS APPROPRIATE). FOR EXAMPLE, MATERIALS AND DEBRIS REMOVED FROM AREAS CONTAINING TSCA SOILS WILL BE DISPOSED AT THE BUILDING 71 OPCA (SEE NOTE 9 ON TECHNICAL DRAWING 9).

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THIS DRAWING WAS PREPARED AT THE SCALE INDICATED IN THE TITLE BLOCK. INACCURACIES IN THE STATED SCALE MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED. USE THE GRAPHIC SCALE BAR IN THE TITLE BLOCK TO DETERMINE THE ACTUAL SCALE OF THIS DRAWING.

No.	Date	Revisions	Init

Professional Engineer's Name	
Professional Engineer's No.	
State	Date Signed
Project Mgr.	Designed by
ACC	DMW



GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
 RD/RA WORK PLAN FOR THE GROUP 3C AND 3D FLOODPLAIN PROPERTIES
SITE PREPARATION PLAN FOR GROUP 3C

TECHNICAL DRAWINGS

BBL Project No. 401.22
Date JUNE 2005
Blasland, Bouck & Lee, Inc. Corporate Headquarters 6723 Towpath Road Syracuse, NY 13214 315-446-9120



LEGEND:

- APPROXIMATE PARCEL BOUNDARY
- 17-3-2** RESIDENTIAL PROPERTY PARCEL ID
- BOUNDARY OF FLOODPLAIN PROPERTIES (PORTION OF BOUNDARY ADJACENT TO RIVER INDICATES TOP OF BANK AS AGREED UPON BY GE AND EPA)
- [Hatched Box] AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
- EASEMENT LINE
- LIGHT POLE
- UTILITY POLE
- CATCH BASIN
- ⊙ DRAIN MANHOLE
- ⊙ SANITARY MANHOLE
- ⊙ HYDRANT
- ⊙ WATER SHUTOFF
- EDGE OF WATER
- WOODEN FENCE
- CHAIN LINK FENCE
- WIRE FENCE
- GUARDRAIL
- GAS SERVICE
- WATER SERVICE
- SANITARY SEWER
- DRAINAGE
- UNDERGROUND ELECTRIC
- OVERHEAD WIRES (VARIOUS)
- EDGE OF BUSHES/HEDGE
- SHRUB
- CONIFEROUS TREES
- DECIDUOUS TREES
- 970--- INDEX ELEVATION CONTOUR
- INTERMEDIATE ELEVATION CONTOUR
- HAY BALE/SILT FENCE
- FENCE REMOVAL/REPLACEMENT (SEE NOTE 3)
- [Shaded Box] LIMITS OF SOIL REMOVAL

CONTRACTOR SHALL MOVE EXISTING FENCING TO ACCOMMODATE SOIL REMOVAL (SEE NOTE 3) AND REPLACE FENCING FOLLOWING RESPONSE ACTIONS (SEE FIGURE 8)

CONTRACTOR SHALL MOVE SHED TO ACCOMMODATE SOIL REMOVAL AND RESET SHED FOLLOWING RESPONSE ACTIONS (SEE FIGURE 8)

CONTRACTOR SHALL MOVE EXISTING ROCKS TO ACCOMMODATE SOIL REMOVAL (SEE NOTE 3) AND RESET ROCKS FOLLOWING RESPONSE ACTIONS (SEE FIGURE 8)

NOTE - ALTHOUGH NOT SHOWN ON DRAWING (FOR CLARITY PURPOSES), CONTRACTOR SHALL INSTALL A CONTINUOUS HAY BALE/SILT FENCE ROW ADJACENT TO AND ALONG THE ENTIRE WESTERN EDGE OF EXCAVATIONS ADJACENT TO THE RIVERBANK. THE SPECIFIC LOCATION OF THE HAY BALE/SILT FENCE SHALL BE FIELD DETERMINED AND APPROVED BY GE.

CONTRACTOR SHALL MOVE EXISTING TRAILER TO ACCOMMODATE SOIL REMOVAL AND RESET TRAILER FOLLOWING RESPONSE ACTIONS (SEE FIGURE 8)

NOTES:

1. REFER TO DRAWING 1 FOR ADDITIONAL BASEMAP INFORMATION AND CONTRACTOR REQUIREMENTS.
2. EXISTING FEATURES WITHIN LIMITS OF SOIL REMOVAL THAT ARE REMOVED SHALL BE DISPOSED OF AT THE APPROPRIATE GE-OWNED OPCA BY CONTRACTOR. CERTAIN EXISTING FEATURES SHALL BE RECONSTRUCTED BY CONTRACTOR IN ACCORDANCE WITH DRAWINGS 5 AND 7.
3. UNLESS OTHERWISE NOTED, CONTRACTOR SHALL REMOVE FOR DISPOSAL AND REPLACE WITH NEW, ALL FENCE POSTS WITHIN LIMITS OF SOIL REMOVAL. THE FENCE MAY BE REUSED IF APPROVED BY GE OR GE'S REPRESENTATIVE. ALL PORTIONS OF THE FENCE DEEMED UNUSABLE BY GE OR GE'S REPRESENTATIVE SHALL BE DISPOSED AND NEW SECTIONS OF FENCE SHALL BE INSTALLED BY CONTRACTOR.
4. AS NEEDED, CONTRACTOR SHALL PERFORM CLEARING AND GRUBBING ACTIVITIES IN AREAS SUBJECT TO RESPONSE ACTIONS (I.e., EXCAVATION AREAS).
5. AS PART OF SITE PREPARATION ACTIVITIES, THE CONTRACTOR SHALL INVENTORY ALL EXISTING TREES AND SHRUBS LOCATED WITHIN THE LIMITS OF EXCAVATION. THIS INVENTORY SHALL BE SUBMITTED TO GE OR GE'S REPRESENTATIVE PRIOR TO INITIATION OF SITE CLEARING ACTIVITIES.
6. MATERIALS AND DEBRIS REMOVED DURING THE IMPLEMENTATION OF RESPONSE ACTIONS WILL BE DISPOSED IN ACCORDANCE WITH THE SURROUNDING SOILS (AS APPROPRIATE). FOR EXAMPLE, MATERIALS AND DEBRIS REMOVED FROM AREAS CONTAINING TSCA SOILS WILL BE DISPOSED AT THE BUILDING 71 OPCA (SEE NOTE 9 ON TECHNICAL DRAWING 9).

X: 40122X00, X03.DWG
 L: 0N=*, OFF=REF, 13A-AVELIMIT, 13A-GROUP,
 13B-AVELIMIT, 13B-GROUP, 13B-PR-EXCAVATION,
 13C-AVELIMIT, 13C-GROUP, 13C-PR-EXCAVATION,
 13D-AVELIMIT, 13D-PR-EXCAVATION, 13FLOOD
 P: PAGESET/SYR-CDL
 6/13/05 SYR-85-DMW LAF GMS
 N/40122004/RDRA/3C3D/CONTRACT/40122G04.DWG

Graphic Scale
 40' 0 40' 80'
 1"=40'

THIS DRAWING WAS PREPARED AT THE SCALE INDICATED IN THE TITLE BLOCK. INACCURACIES IN THE STATED SCALE MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED. USE THE GRAPHIC SCALE BAR IN THE TITLE BLOCK TO DETERMINE THE ACTUAL SCALE OF THIS DRAWING.

No.	Date	Revisions	Init

NO ALTERATIONS PERMITTED HEREON EXCEPT AS PROVIDED UNDER SECTION 7209 SUBDIVISION 2 OF THE NEW YORK STATE EDUCATION LAW

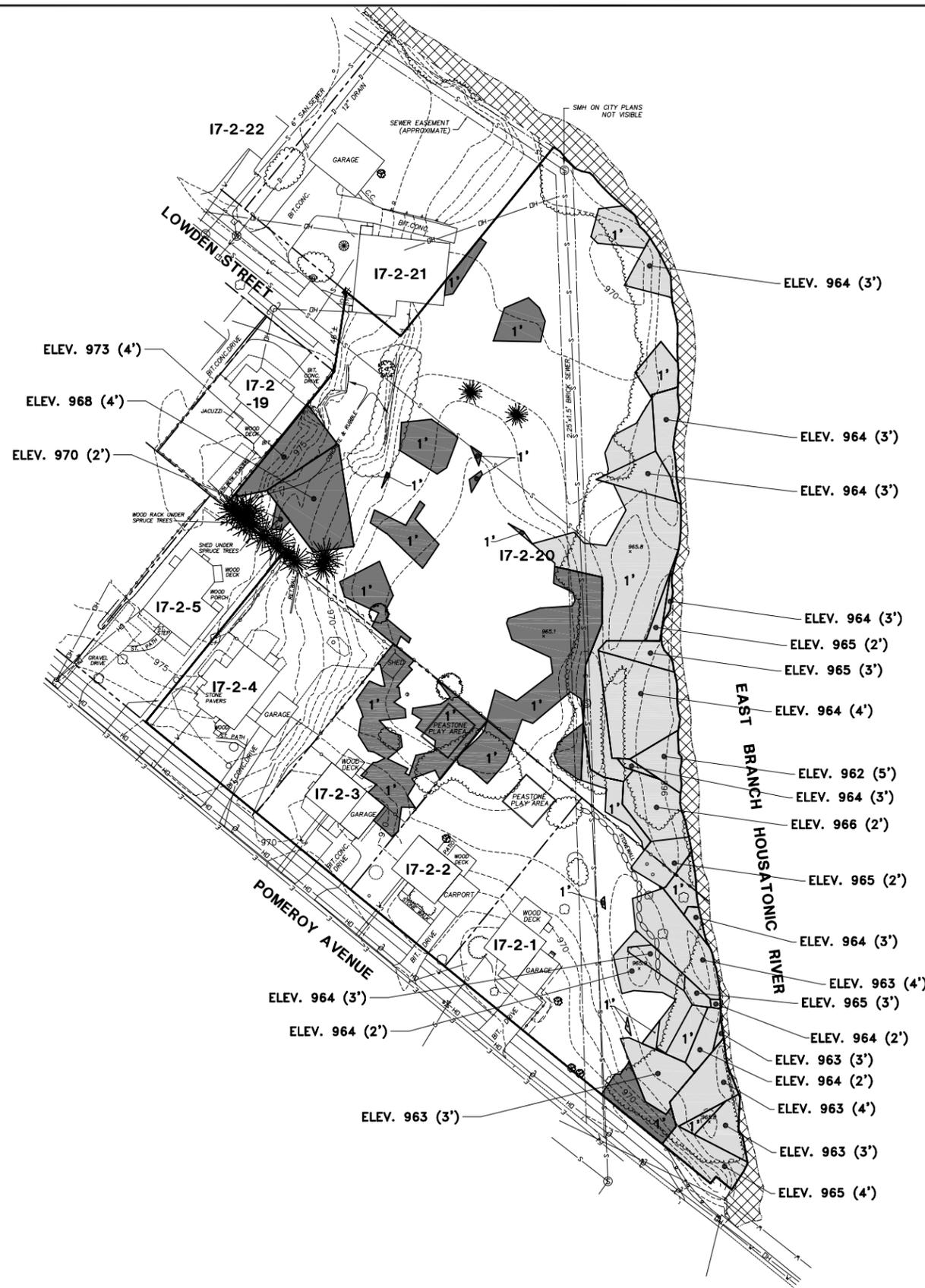
Professional Engineer's Name			
Professional Engineer's No.			
State	Date Signed		
Project Mgr.	Designed by	Drawn by	
ACC		DMW	



GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
 RD/RA WORK PLAN FOR THE GROUP 3C AND 3D FLOODPLAIN PROPERTIES
SITE PREPARATION PLAN FOR GROUP 3D

TECHNICAL DRAWINGS

BBL Project No. 401.22
Date JUNE 2005
Blasland, Bouck & Lee, Inc. Corporate Headquarters 6723 Towpath Road Syracuse, NY 13214 315-446-9120



LEGEND:

- APPROXIMATE PARCEL BOUNDARY
- 17-2-20** RESIDENTIAL PROPERTY PARCEL ID
- BOUNDARY OF FLOODPLAIN PROPERTIES (PORTION OF BOUNDARY ADJACENT TO RIVER INDICATES TOP OF BANK AS AGREED UPON BY GE AND EPA)
- AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
- EASEMENT LINE
- LIGHT POLE
- UTILITY POLE
- CATCH BASIN
- ⊕ DRAIN MANHOLE
- ⊙ SANITARY MANHOLE
- ⊕ HYDRANT
- ⊕ WATER SHUTOFF
- EDGE OF WATER
- WOODEN FENCE
- CHAIN LINK FENCE
- WIRE FENCE
- GUARDRAIL
- GAS SERVICE
- WATER SERVICE
- SANITARY SEWER
- DRAINAGE
- UNDERGROUND ELECTRIC
- OVERHEAD WIRES (VARIOUS)
- EDGE OF BUSHES/HEDGE
- SHRUB
- CONIFEROUS TREES
- DECIDUOUS TREES
- 970--- INDEX ELEVATION CONTOUR
- INTERMEDIATE ELEVATION CONTOUR
- TSCA REMOVAL (SEE NOTE 3)
- NON-TSCA REMOVAL (SEE NOTE 3)

- NOTES:**
- REFER TO DRAWING 1 FOR ADDITIONAL BASEMAP INFORMATION AND CONTRACTOR REQUIREMENTS.
 - AREAS DESIGNATED AS 1' WILL BE SUBJECT TO SOIL REMOVAL ACTIVITIES TO A DEPTH OF 1 FOOT BELOW GROUND SURFACE. ALL OTHER EXCAVATIONS SHALL EXTEND TO THE SPECIFIED ELEVATION. (DEPTHS SHOWN IN PARENTHESES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY).
 - EXCAVATED MATERIALS SPECIFIED HEREIN AS TSCA TO BE DISPOSED OF AT THE BUILDING 71 OPCA. ALL OTHER EXCAVATION MATERIALS SPECIFIED HEREIN TO BE DISPOSED OF AT THE HILL 78 OPCA.
 - TREES AND RIPRAP WITHIN THE LIMITS OF EPA'S HOUSATONIC RIVER EXCAVATION SHALL BE PROTECTED OR RESTORED TO EXISTING CONDITION.
 - CONTRACTOR SHALL TAKE PRECAUTIONARY MEASURES IN THE VICINITY OF UTILITY POLES THROUGHOUT THE IMPLEMENTATION OF REMOVAL ACTIONS.
 - THE CONTRACTOR SHALL SHEAR/SHRED ALL TREES AND SHRUBS (INCLUDING ROOTS) REMOVED DURING THE PERFORMANCE OF RESPONSE ACTIONS FOR TRANSPORTATION TO THE BUILDING 71 OPCA.

X: 40122X00, X03.DWG
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 [3C-PR-EXCAVATION, FLOOD,
 CENT, SampleLocations_0-05
 P: PAGESET/SYR-CDL
 6/13/05 SYR-85-DMW LAF GMS
 N/40122004/RDRA/3C3D/CONTRACT/40122G11.DWG



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No.	Date	Revisions	Init

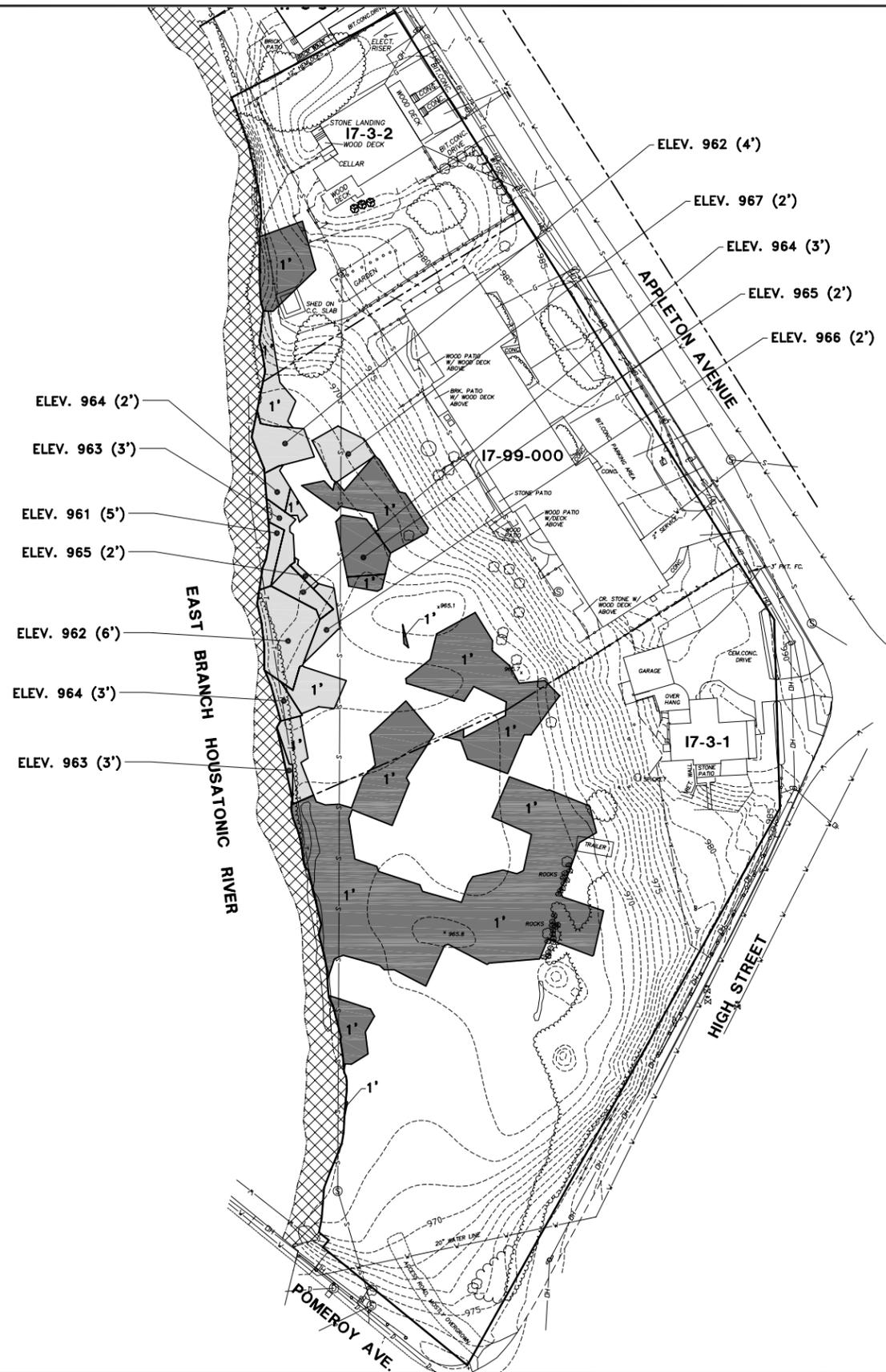
Professional Engineer's Name	
Professional Engineer's No.	
State	Date Signed
Project Mgr.	Designed by
ACC	DMW



GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
 RD/RA WORK PLAN FOR THE GROUP 3C AND 3D FLOODPLAIN PROPERTIES
EXCAVATION LIMITS FOR GROUP 3C

TECHNICAL DRAWINGS

BBL Project No. 401.22
Date JUNE 2005
Blasland, Bouck & Lee, Inc. Corporate Headquarters 6723 Towpath Road Syracuse, NY 13214 315-446-9120



LEGEND:

- APPROXIMATE PARCEL BOUNDARY
- 17-3-2 RESIDENTIAL PROPERTY PARCEL ID
- BOUNDARY OF FLOODPLAIN PROPERTIES (PORTION OF BOUNDARY ADJACENT TO RIVER INDICATES TOP OF BANK AS AGREED UPON BY GE AND EPA)
- ▨ AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
- EASEMENT LINE
- LIGHT POLE
- UTILITY POLE
- CATCH BASIN
- ⊙ DRAIN MANHOLE
- ⊙ SANITARY MANHOLE
- ⊙ HYDRANT
- ⊙ WATER SHUTOFF
- EDGE OF WATER
- WOODEN FENCE
- CHAIN LINK FENCE
- WIRE FENCE
- GUARDRAIL
- GAS SERVICE
- WATER SERVICE
- SANITARY SEWER
- DRAINAGE
- UNDERGROUND ELECTRIC
- OH OVERHEAD WIRES (VARIOUS)
- EDGE OF BUSHES/HEDGE
- SHRUB
- CONIFEROUS TREES
- DECIDUOUS TREES
- 970--- INDEX ELEVATION CONTOUR
- INTERMEDIATE ELEVATION CONTOUR
- ▨ TSCA REMOVAL (SEE NOTE 3)
- ▨ NON-TSCA REMOVAL (SEE NOTE 3)

- NOTES:**
- REFER TO DRAWING 1 FOR ADDITIONAL BASEMAP INFORMATION AND CONTRACTOR REQUIREMENTS.
 - AREAS DESIGNATED AS 1' WILL BE SUBJECT TO SOIL REMOVAL ACTIVITIES TO A DEPTH OF 1 FOOT BELOW GROUND SURFACE. ALL OTHER EXCAVATIONS SHALL EXTEND TO THE SPECIFIED ELEVATION. (DEPTHS SHOWN IN PARENTHESES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY).
 - EXCAVATED MATERIALS SPECIFIED HEREIN AS TSCA TO BE DISPOSED OF AT THE BUILDING 71 OPCA. ALL OTHER EXCAVATION MATERIALS SPECIFIED HEREIN TO BE DISPOSED OF AT THE HILL 78 OPCA.
 - TREES AND RIPRAP WITHIN THE LIMITS OF EPA'S HOUSATONIC RIVER EXCAVATION SHALL BE PROTECTED OR RESTORED TO EXISTING CONDITION.
 - CONTRACTOR SHALL TAKE PRECAUTIONARY MEASURES IN THE VICINITY OF UTILITY POLES THROUGHOUT THE IMPLEMENTATION OF REMOVAL ACTIONS.
 - THE CONTRACTOR SHALL SHEAR/SHRED ALL TREES AND SHRUBS (INCLUDING ROOTS) REMOVED DURING THE PERFORMANCE OF RESPONSE ACTIONS FOR TRANSPORTATION TO THE BUILDING 71 OPCA.

X: 40122X00, 40122X03.DWG
 L: ON=*, OFF=REF, 3D_SampleLocations_5-6, [3A-AVELIMIT, [3A-GROUP, [3B-AVELIMIT, [3B-GROUP, [3B-PR-EXCAVATION, [3C-AVELIMIT, [3C-GROUP, [3C-PR-EXCAVATION, [3D-AVELIMIT, [3D-PR-EXCAVATION, [FLOOD, CENT
 P: PAGESET/SYR-CDL
 6/11/05 SYR-85-DMW LAF GMS
 N/40122004/RDRA/3C3D/CONTRACT/40122G10.DWG



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No.	Date	Revisions	Init

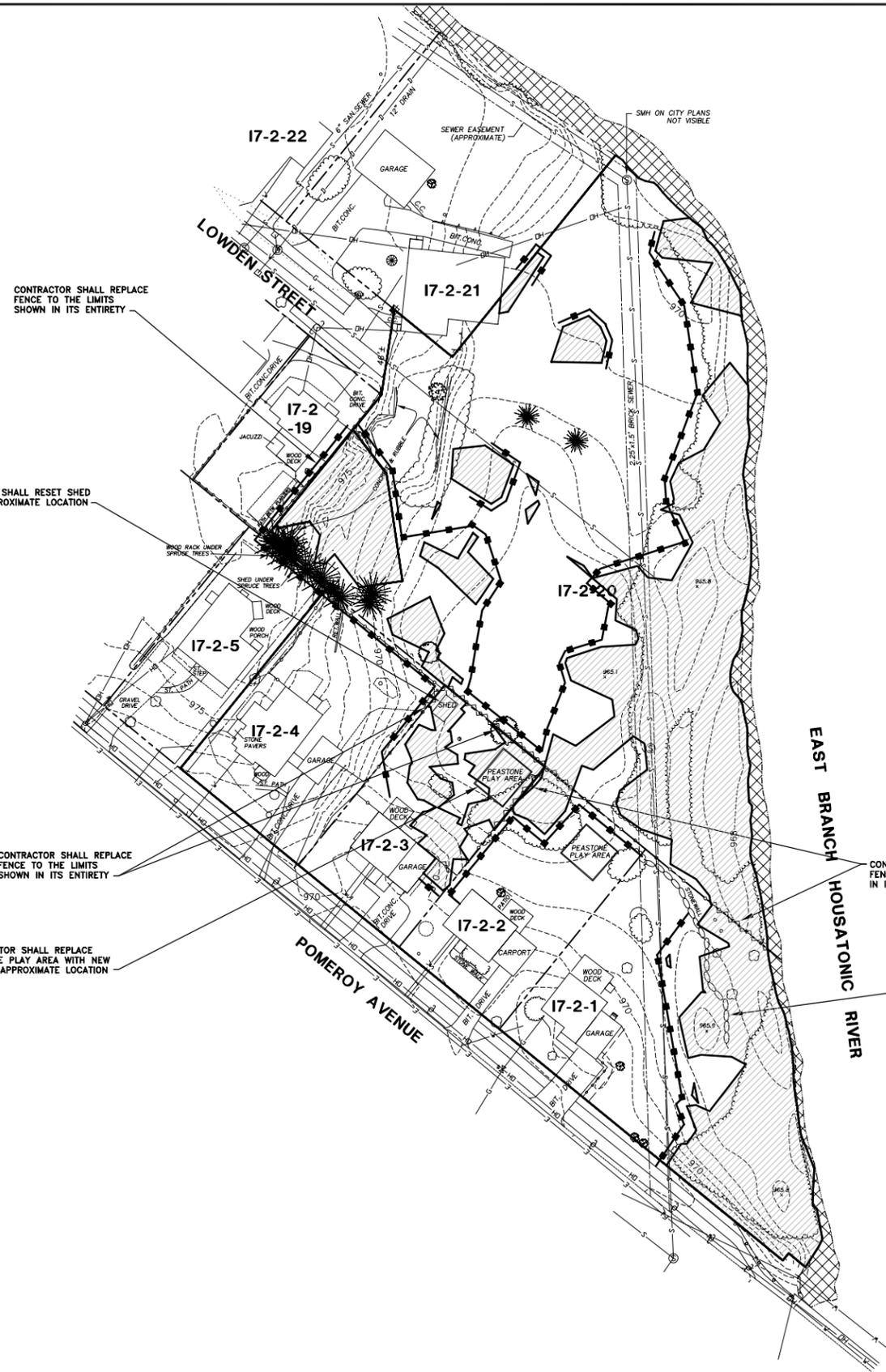
Professional Engineer's Name	
Professional Engineer's No.	
State	Date Signed
Project Mgr.	Designed by
ACC	DMW



GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
 RD/RA WORK PLAN FOR THE GROUP 3C AND 3D FLOODPLAIN PROPERTIES
EXCAVATION LIMITS FOR GROUP 3D

TECHNICAL DRAWINGS

BBL Project No. 401.22
Date JUNE 2005
Blasland, Bouck & Lee, Inc. Corporate Headquarters 6723 Towpath Road Syracuse, NY 13214 315-446-9120



NOTE - ALTHOUGH NOT SHOWN ON DRAWING (FOR CLARITY PURPOSES), CONTRACTOR SHALL INSTALL A CONTINUOUS HAY BALE/SILT FENCE ROW ADJACENT TO AND ALONG THE ENTIRE EASTERN EDGE OF EXCAVATIONS ADJACENT TO THE RIVERBANK. THE SPECIFIC LOCATION OF THE HAY BALE/SILT FENCE SHALL BE FIELD DETERMINED AND APPROVED BY GE.

LEGEND:

- APPROXIMATE PARCEL BOUNDARY
- 17-2-20** RESIDENTIAL PROPERTY PARCEL ID
- BOUNDARY OF FLOODPLAIN PROPERTIES (PORTION OF BOUNDARY ADJACENT TO RIVER INDICATES TOP OF BANK AS AGREED UPON BY GE AND EPA)
- [Cross-hatched] AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
- EASEMENT LINE
- LIGHT POLE
- ⊕ UTILITY POLE
- CATCH BASIN
- ⊙ DRAIN MANHOLE
- ⊙ SANITARY MANHOLE
- ⊙ HYDRANT
- ⊕ WATER SHUTOFF
- EDGE OF WATER
- WOODEN FENCE
- CHAIN LINK FENCE
- WIRE FENCE
- GUARDRAIL
- GAS SERVICE
- WATER SERVICE
- SANITARY SEWER
- DRAINAGE
- UNDERGROUND ELECTRIC
- OVERHEAD WIRES (VARIOUS)
- EDGE OF BUSHES/HEDGE
- ⊙ SHRUB
- ⊙ CONIFEROUS TREES
- ⊙ DECIDUOUS TREES
- 970--- INDEX ELEVATION CONTOUR
- INTERMEDIATE ELEVATION CONTOUR
- [Circle with 1/9] HAY BALE/SILT FENCE (SEE NOTE 3)
- FENCE REMOVAL/REPLACEMENT (SEE NOTE 3)
- [Hatched] VEGETATIVE RESTORATION (SEE NOTE 3)

- NOTES:**
- REFER TO DRAWING 1 FOR ADDITIONAL BASEMAP INFORMATION AND CONTRACTOR REQUIREMENTS.
 - FOLLOWING COMPLETION OF EXCAVATION ACTIVITIES (DEPICTED ON FIGURE 5), AREAS SHALL BE RESTORED TO PRE-EXCAVATION GRADES (UNLESS OTHERWISE SPECIFIED) AND SEEDED IN ACCORDANCE WITH TECHNICAL SPECIFICATIONS.
 - VEGETATIVE RESTORATION TO CONSIST OF 6 INCHES OF TOPSOIL, SEED AND MULCH.
 - HAY BALES/SILT FENCE WILL BE REMOVED BY THE CONTRACTOR WHEN REQUESTED BY GE OR GE'S REPRESENTATIVE.
 - CONTRACTOR SHALL COORDINATE SURFACE RESTORATIONS WITH OTHER TREE PLANTING/LANDSCAPING ACTIVITIES (ONCE DETERMINED). UNLESS OTHERWISE DIRECTED BY GE, SURFACE RESTORATION SHALL NOT BE CONDUCTED UNTIL ALL OTHER LANDSCAPING ACTIVITIES HAVE BEEN COMPLETED.
 - A PLAN TO ADDRESS THE REPLANTING OF TREES AND SHRUBS WILL BE DEVELOPED BASED ON CONSULTATION WITH EPA AND DISCUSSIONS WITH THE PROPERTY OWNERS.

X: 40122X00, X03.DWG
 L: ON=*, OFF=*REF
 P: PAGESET/SYR-CDL
 6/13/05 SYR-85-DMW LAF GMS
 N/40122004/RDRA/3C3D/CONTRACT/40122G07.DWG



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No.	Date	Revisions	Init

Professional Engineer's Name		
Professional Engineer's No.		
State	Date Signed	
Project Mgr.	Designed by	Drawn by
ACC		DMW

BBL
 BLASLAND, BOUCK & LEE, INC.
 engineers, scientists, economists

GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
 RD/RA WORK PLAN FOR THE GROUP 3C AND 3D FLOODPLAIN PROPERTIES

SITE RESTORATION PLAN FOR GROUP 3C

TECHNICAL DRAWINGS

BBL Project No. 401.22
Date JUNE 2005
Blasland, Bouck & Lee, Inc. Corporate Headquarters 6723 Towpath Road Syracuse, NY 13214 315-446-9120



LEGEND:

- APPROXIMATE PARCEL BOUNDARY
- 17-3-2** RESIDENTIAL PROPERTY PARCEL ID
- BOUNDARY OF FLOODPLAIN PROPERTIES (PORTION OF BOUNDARY ADJACENT TO RIVER INDICATES TOP OF BANK AS AGREED UPON BY GE AND EPA)
- [Cross-hatched box] AREA TO BE ADDRESSED BY EPA IN 1 1/2 MILE REACH REMOVAL AREA
- EASEMENT LINE
- LIGHT POLE
- UTILITY POLE
- CATCH BASIN
- ⊙ DRAIN MANHOLE
- ⊙ SANITARY MANHOLE
- ⊙ HYDRANT
- ⊙ WATER SHUTOFF
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- WIRE FENCE
- GUARDRAIL
- GAS SERVICE
- WATER SERVICE
- SANITARY SEWER
- DRAINAGE
- UNDERGROUND ELECTRIC
- OH --- OVERHEAD WIRES (VARIOUS)
- EDGE OF BUSHES/HEDGE
- SHRUB
- CONIFEROUS TREES
- DECIDUOUS TREES
- 970--- INDEX ELEVATION CONTOUR
- INTERMEDIATE ELEVATION CONTOUR
- [Circle with 1/8] HAY BALE/SILT FENCE (SEE NOTE 3)
- [Wavy line] FENCE REMOVAL/REPLACEMENT (SEE NOTE 3)
- [Hatched box] VEGETATIVE RESTORATION (SEE NOTE 3)

CONTRACTOR SHALL REPLACE FENCE TO THE LIMITS SHOWN IN ITS ENTIRETY

CONTRACTOR SHALL RESET SHED AT THIS APPROXIMATE LOCATION

CONTRACTOR SHALL RESET ROCKS AT THIS APPROXIMATE LOCATION

NOTE - ALTHOUGH NOT SHOWN ON DRAWING (FOR CLARITY PURPOSES), CONTRACTOR SHALL INSTALL A CONTINUOUS HAY BALE/SILT FENCE ROW ADJACENT TO AND ALONG THE ENTIRE WESTERN EDGE OF EXCAVATIONS ADJACENT TO THE RIVERBANK. THE SPECIFIC LOCATION OF THE HAY BALE/SILT FENCE SHALL BE FIELD DETERMINED AND APPROVED BY GE.

CONTRACTOR SHALL REPLACE TRAILER AT THIS APPROXIMATE LOCATION

NOTES:

1. REFER TO DRAWING 1 FOR ADDITIONAL BASEMAP INFORMATION AND CONTRACTOR REQUIREMENTS.
2. FOLLOWING COMPLETION OF EXCAVATION ACTIVITIES (DEPICTED ON FIGURE 5), AREAS SHALL BE RESTORED TO PRE-EXCAVATION GRADES (UNLESS OTHERWISE SPECIFIED) AND SEEDED IN ACCORDANCE WITH TECHNICAL SPECIFICATIONS.
3. VEGETATIVE RESTORATION TO CONSIST OF 6 INCHES OF TOPSOIL, SEED AND MULCH.
4. HAY BALES/SILT FENCE WILL BE REMOVED BY THE CONTRACTOR WHEN REQUESTED BY GE OR GE'S REPRESENTATIVE.
5. CONTRACTOR SHALL COORDINATE SURFACE RESTORATIONS WITH OTHER TREE PLANTING/LANDSCAPING ACTIVITIES (ONCE DETERMINED). UNLESS OTHERWISE DIRECTED BY GE, SURFACE RESTORATION SHALL NOT BE CONDUCTED UNTIL ALL OTHER LANDSCAPING ACTIVITIES HAVE BEEN COMPLETED.
6. A PLAN TO ADDRESS THE REPLANTING OF TREES AND SHRUBS WILL BE DEVELOPED BASED ON CONSULTATION WITH EPA AND DISCUSSIONS WITH THE PROPERTY OWNERS.

X: 40122X00_X03.DWG
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 P: PAGESET/SYR-CDL
 6/13/05 SYR-85-DMW LAF GMS
 C/40122004/RDRA/3C3D/CONTRACT/40122G08.DWG



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No.	Date	Revisions	Init

Professional Engineer's Name	
Professional Engineer's No.	
State	Date Signed
Project Mgr.	Designed by
ACC	DMW

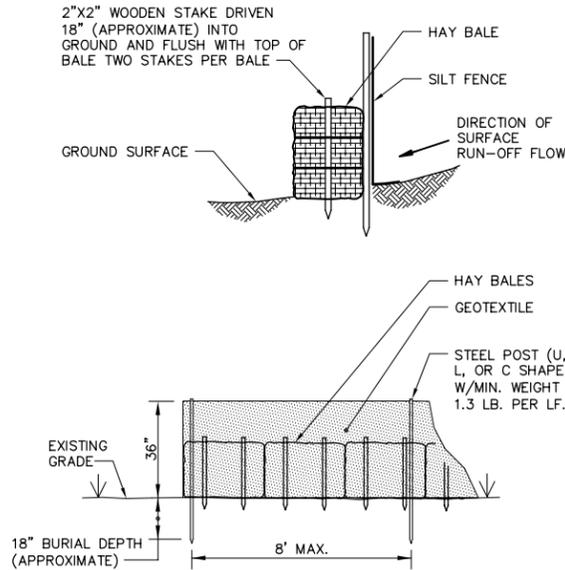


GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
 RD/RA WORK PLAN FOR THE GROUP 3C AND 3D FLOODPLAIN PROPERTIES
SITE RESTORATION PLAN FOR GROUP 3D

TECHNICAL DRAWINGS

BBL Project No. 401.22
Date JUNE 2005
Blasland, Bouck & Lee, Inc. Corporate Headquarters 6723 Towpath Road Syracuse, NY 13214 315-446-9120

GENERAL NOTES - DRAWINGS 1 THROUGH 8



NOTES:

1. UNTIL SUCH TIME THAT ALL EXCAVATION ACTIVITIES HAVE BEEN COMPLETED AND BACKFILL MATERIAL HAS BEEN PLACED IN ALL AREAS, SILT ACCUMULATIONS ADJACENT TO EROSION CONTROL MEASURES SHALL BE IMMEDIATELY REMOVED AND DISPOSED WITH SOILS SUBJECT TO TRANSPORT AND DISPOSAL.
2. THE CONTRACTOR SHALL INSPECT INSTALLATION AND REMOVE SILT AND OTHER DEBRIS AS IT ACCUMULATES.
3. HAY BALES/SILT FENCE WILL BE REMOVED BY THE CONTRACTOR WHEN REQUESTED BY GE OR GE'S REPRESENTATIVE. CONTRACTOR SHALL BACKFILL EXCAVATIONS AS NECESSARY AND RESTORE SURFACE COVER.
4. THE CONTRACTOR SHALL MAINTAIN THE INTEGRITY OF THE HAY BALES/SILT FENCING UNTIL RESTORATION ACTIVITIES ARE COMPLETE.

HAY BALE/SILT FENCE 1

NOT TO SCALE

1. THE SOILS SUBJECT TO EXCAVATION AND HANDLING CONTAIN PCBs AND OTHER HAZARDOUS CONSTITUENTS AND SHOULD BE HANDLED IN ACCORDANCE WITH APPLICABLE REGULATIONS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR DEVELOPING AND IMPLEMENTING APPROPRIATE HEALTH AND SAFETY MEASURES FOR ITS EMPLOYEES AND SUBCONTRACTORS.
2. THE CONTRACTOR SHALL BE RESPONSIBLE FOR ESTABLISHING SURVEY CONTROL AND VERIFYING EXISTING GRADES AND POST-EXCAVATION ELEVATIONS. GE WILL IDENTIFY LOCATION(S) AND ELEVATION(S) OF SUITABLE BENCHMARKS TO BE USED FOR SURVEY CONTROL.
3. THE DRAWINGS MAY NOT INDICATE ALL SURFACE FEATURES SUBJECT TO REPLACEMENT AS PART OF SITE RESTORATION ACTIVITIES. THIS WILL NOT RELIEVE THE CONTRACTOR FROM REMOVING AND REPLACING (IF NECESSARY) ANY AND ALL SUCH ITEMS AT NO ADDITIONAL COST TO GE.
4. LOCATIONS OF UNDERGROUND UTILITIES AND STRUCTURES ARE APPROXIMATE. THE CONTRACTOR SHALL VERIFY THE LOCATIONS OF ALL (SHOWN OR NOT SHOWN) ABOVE AND BELOW GROUND UTILITIES AND STRUCTURES THAT MAY EXIST WITHIN THE PROJECT LIMITS PRIOR TO COMMENCEMENT OF WORK.
5. THE CONTRACTOR SHALL COORDINATE WITH THE APPROPRIATE UTILITY COMPANIES FOR THE TEMPORARY PROTECTION OF (AND/OR REMOVAL AND REPLACEMENT, AS NECESSARY, AS DETERMINED BY THE APPROPRIATE UTILITY COMPANY) ANY UTILITY POLES, GUY WIRES, UNDERGROUND UTILITIES, AND/OR OVERHEAD WIRES THAT FALL WITHIN THE LIMITS OF EXCAVATION.
6. EXCAVATION LIMITS SHOWN ON THE TECHNICAL DRAWINGS REPRESENT SOILS THAT REQUIRE REMOVAL TO ACHIEVE THE NECESSARY REMOVAL ACTION OUTCOME. ADDITIONAL REMOVAL THAT MAY BE NEEDED TO FACILITATE CONSTRUCTION ACCESS, RESTORATION, ETC. HAS NOT BEEN IDENTIFIED.
7. THE CONTRACTOR SHALL TAKE ALL MEASURES NECESSARY TO AVOID DAMAGE TO STRUCTURES THAT ARE NOT SUBJECT TO REMOVAL AND REPLACEMENT AS PART OF THIS CONTRACT. THE CONTRACTOR SHALL REPAIR ANY STRUCTURAL OR EXTERNAL DAMAGES TO SUCH STRUCTURES AT NO ADDITIONAL COST TO GE.
8. THE CONTRACTOR SHALL COORDINATE SITE ACTIVITIES TO MINIMIZE INFRINGEMENT UPON NORMAL TRAFFIC FLOW ON ADJACENT ROADWAYS.
9. ABOVEGROUND PORTIONS OF ITEMS SUBJECT TO REMOVAL AND REPLACEMENT TO ACCOMMODATE EXCAVATION ACTIVITIES (E.G., FENCING, ETC.) MAY BE SALVAGED FOR REUSE UPON APPROVAL BY GE OR GE'S REPRESENTATIVE. APPROVED SALVAGED MATERIALS MAY BE USED WHEN RECONSTRUCTING THESE ITEMS. BELOW-GRADE COMPONENTS AND/OR COMPONENTS THAT HAVE CONTACTED SOILS SUBJECT TO EXCAVATION SHALL BE HANDLED AND DISPOSED OF WITH THE ASSOCIATED SOILS. ALL SUCH ITEMS SHALL BE BROKEN INTO SUFFICIENTLY SMALL PIECES (IF NECESSARY) TO BE ACCEPTABLE FOR TRANSPORT AND DISPOSAL WITH THE SOILS. BELOW-GRADE COMPONENTS SHALL BE REPLACED AS PART OF SITE RESTORATION ACTIVITIES.
10. THE CONTRACTOR SHALL SHEAR/SHRED ALL TREES AND SHRUBS (INCLUDING ROOTS) REMOVED DURING THE PERFORMANCE OF RESPONSE ACTIONS FOR TRANSPORTATION TO THE BUILDING 71 OPCA.
11. THE CONTRACTOR SHALL PROVIDE A WATER TRUCK AND APPROPRIATE EQUIPMENT FOR DUST SUPPRESSION WITHIN SOIL EXCAVATION, HAUL ROADS, AND LOADING AREAS. THESE AREAS SHALL BE WATERED BASED ON VISUAL OBSERVATIONS, THE RESULTS OF AIR MONITORING ACTIVITIES, AND/OR DIRECTION BY GE OR GE'S REPRESENTATIVE.
12. ON A DAILY BASIS, THE CONTRACTOR SHALL ENSURE PERIMETER AIR MONITORING (TO BE PERFORMED BY OTHERS) IS BEING PERFORMED PRIOR TO THE START OF EXCAVATION OR OTHER EXISTING SOIL HANDLING ACTIVITIES.
13. THE HORIZONTAL LIMITS OF EXCAVATION ACTIVITIES WILL BE PHYSICALLY DELINEATED IN THE FIELD BY THE CONTRACTOR. WITHIN THESE LIMITS, THE CONTRACTOR SHALL BE RESPONSIBLE FOR EXECUTING AND VERIFYING THE SPECIFIED DEPTH OR ELEVATION OF EXCAVATION.
14. THE CONTRACTOR MAY CONSTRUCT TEMPORARY SOIL STOCKPILES FOR EXCAVATED MATERIALS AT AREAS AND OF VOLUMES APPROVED BY GE OR GE'S REPRESENTATIVE. THE CONTRACTOR WILL BE RESPONSIBLE FOR ESTABLISHING AND MAINTAINING PERIMETER EROSION AND SEDIMENTATION CONTROLS (IN THE FORM OF SILT FENCING/HAY BALES AS INDICATED), RUN-OFF WATER COLLECTION, AND DUST SUPPRESSION IN THIS AREA. THE CONTRACTOR SHALL COVER THE STOCKPILED MATERIALS WITH POLYETHYLENE LINERS WHEN NO ACTIVITIES ARE BEING PERFORMED IN THE STOCKPILE AREA.
15. THE CONTRACTOR SHALL BE RESPONSIBLE FOR TRANSPORTING EXCAVATED/REMOVED MATERIALS TO THE APPROPRIATE OPCA. THE CONTRACTOR WILL BE REQUIRED TO PROVIDE THREE DAYS NOTICE TO GE OR GE'S REPRESENTATIVE PRIOR TO TRANSPORTATION OF EXCAVATED/STOCKPILED MATERIALS TO THE OPCA. THE CONTRACTOR IS REQUIRED TO PROVIDE NO LESS THAN 32 TRUCK LOADS OF MATERIAL, CONSISTING OF NO LESS THAN 10 CUBIC YARDS PER LOAD, PER DAY WHEN TRANSPORTING MATERIALS TO THE OPCAS.
16. CONTRACTOR SHALL INSTALL AN INTERIM COVER (E.G., POLYETHYLENE SHEETING) OVER WORK AREAS WHERE EXCAVATION ACTIVITIES HAVE BEEN INITIATED BUT ARE NOT YET COMPLETED. THE INTERIM COVER SHALL BE PROPERLY ANCHORED TO RESIST WIND FORCES AND PREVENT STORMWATER FROM ENTERING SUCH WORK AREAS.
17. DRIVEWAYS, CONCRETE SURFACES, PLANTERS AND/OR OTHER ITEMS SUBJECT TO REMOVAL AND REPLACEMENT SHALL BE RECONSTRUCTED TO SIMILAR DIMENSIONS AND APPEARANCE AS THE ORIGINAL ITEM. PAVEMENT SUBJECT TO PARTIAL REMOVAL SHALL BE REMOVED VIA SAW-CUT. RESTORATION SHALL MEET ALL LOCAL AND/OR STATE BUILDING CODES. CONTRACTOR SHALL OBTAIN ALL APPROPRIATE BUILDING PERMITS ASSOCIATED WITH RESTORATION ACTIVITIES.
18. UPON BACKFILLING OF EXCAVATED AREAS, THE CONTRACTOR SHALL MAINTAIN IN PLACE OR INSTALL ADDITIONAL EROSION CONTROLS IN THE LOCATIONS INDICATED ON EACH WORK SITE DRAWING. THE EROSION CONTROLS WILL BE REMOVED BY THE CONTRACTOR WHEN REQUESTED BY GE OR GE'S REPRESENTATIVE.
19. BACKFILLED AND RESTORED AREAS WILL BE SUBJECT TO FINAL SURVEY VERIFICATION (BY THE CONTRACTOR). THE CONTRACTOR SHALL REPAIR ANY ITEMS THAT ARE NOT RESTORED TO THE LOCATIONS AND/OR ELEVATIONS REQUIRED BY THIS CONTRACT.
20. THE CONTRACTOR SHALL RESTORE TO PRE-REMEDIATION CONDITIONS ALL SUPPORT AREAS THAT ARE IMPACTED BY REMEDIATION ACTIVITIES, INCLUDING EQUIPMENT AND MATERIALS STORAGE AREAS, SOIL LOADING AND STAGING AREAS, AND PARKING AREAS.
21. ALL EQUIPMENT OPERATED WITHIN THE LIMITS OF EXCAVATION SHALL BE CLEANED PRIOR TO USE OR STORAGE ELSEWHERE ON THE SITE OR TRANSPORTED OFF-SITE. A CONTAINED/LINED WHEEL WASH AREA SHALL BE PROVIDED BY THE CONTRACTOR TO BE USED AS NECESSARY FOR CLEANING EXCAVATION EQUIPMENT AND/OR TRANSPORTATION VEHICLES PRIOR TO THEIR REMOVAL FROM THE WORK SITE. WATER USED TO CLEAN EQUIPMENT SHALL BE RESTRICTED TO AND COLLECTED WITHIN A DESIGNATED EQUIPMENT CLEANING AREA. ALL SUCH WATERS SHALL BE CONTAINERIZED AND TRANSPORTED BY THE CONTRACTOR FOR APPROPRIATE DISPOSAL/TREATMENT.
22. SELECT SITE FEATURES MAY OR MAY NOT BE SHOWN ON DRAWINGS (E.G., ADDITIONAL CONCRETE PADS, MANHOLES, ETC.). CONTRACTOR SHALL PROTECT THESE FEATURES.
23. WHEN EXCAVATING MATERIALS FROM A GIVEN AREA CONTAINING BOTH TSCA AND NON-TSCA MATERIALS, THE CONTRACTOR SHALL BE RESPONSIBLE FOR SEGREGATING THESE MATERIALS (ACCORDING TO THEIR TSCA OR NON-TSCA CLASSIFICATION) FOR THE PURPOSES OF MATERIAL HANDLING, TEMPORARY STAGING, TRANSPORT, AND DISPOSAL.
24. WITHIN THE LIMITS OF EXCAVATION, THE CONTRACTOR SHALL RESTORE ALL PREVIOUSLY VEGETATED AREAS BY PLACING AND COMPACTING FILL MATERIALS (TO ACHIEVE A GRADE OF APPROXIMATELY 6 INCHES BELOW PRE-REMOVAL GRADE, WHERE APPROPRIATE), TOPSOIL, AND THEN SEED AND MULCH. DRIVEWAYS, STEPS, CONCRETE SURFACES, AND OTHER SURFACES IMPACTED BY EXCAVATION ACTIVITIES SHALL BE RESTORED TO THEIR ORIGINAL LOCATION, ELEVATION, AND CONDITION. OTHER SURFACE FEATURES SHALL BE REPLACED OR RESTORED AS INDICATED.

L: ON=*, OFF=*REF*
P: PAGESET/SYR-CDL
6/13/05 SYR-85-TJR LAF GMS
N/40122004/RDRA/3C3D/CONTRACT/40122G09.DWG



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No.	Date	Revisions	Init

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Professional Engineer's Name		
Professional Engineer's No.		
State	Date Signed	
Project Mgr.	Designed by	Drawn by
ACC		DMW



GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
RD/RA WORK PLAN FOR THE GROUP 3C AND 3D FLOODPLAIN PROPERTIES

GENERAL NOTES AND DETAILS

TECHNICAL DRAWINGS

BBL Project No. 401.22
Date JUNE 2005
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