



GE  
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USA

*Transmitted Via Overnight Delivery*

April 13, 2006

Ms. Sharon M. Hayes  
GE Facility Project Manager  
United States Environmental Protection Agency  
One Congress Street, Suite 1100  
Boston, MA 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
Building 71 and Hill 78 On-Plant Consolidation Areas (GECD200)  
2006 Addendum to OPCA Work Plan**

Dear Ms. Hayes:

This letter documents several modifications recently implemented, or to be implemented, by the General Electric Company (GE) at the Building 71 and Hill 78 On-Plant Consolidation Areas (OPCAs) located within the GE Plant Area in Pittsfield, Massachusetts. Most of these modifications relate to operational aspects of the OPCAs, such as air monitoring, dust control, traffic flow, and other maintenance items, and have been incorporated into the day-to-day operations of the OPCAs, with the concurrence of the U.S. Environmental Protection Agency (EPA). However, the modifications described herein also include a proposed modification to the configuration of the Hill 78 OPCA.

The design, construction, operation, closure, and post-closure monitoring of the OPCAs were described in a June 1999 document titled *Detailed Work Plan for On-Plant Consolidation Areas* (1999 Detailed Work Plan), which was conditionally approved by EPA in a letter dated July 9, 1999, and is included in an attachment to the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site. That work plan was subsequently amended by an August 12, 1999 Addendum to the June 1999 Work Plan (also included in an attachment to the CD), and further modified by GE's June 13, 2000 Response to EPA's April 27, 2000 Comments on that Addendum. The June 1999 Detailed Work Plan, as so amended and modified (referred to collectively as the "OPCA Work Plan"), was conditionally approved by EPA in a letter dated January 30, 2001. On March 9, 2001, GE provided a response to EPA's conditions in that letter.

Since that time, GE has periodically provided OPCA-related technical submittals and other status updates to EPA. These have included technical design documents corresponding to the phased construction and use of the OPCAs, as well as regular updates on OPCA operations in GE's monthly status reports under the CD. In addition, GE and EPA routinely discuss operation of the OPCAs, including the status of the OPCAs in terms of receiving materials stemming from EPA's ongoing remediation activities associated with the 1½ Mile Reach of the Housatonic River.

Most recently, beginning in the fall of 2005, GE and EPA have had several discussions regarding various aspects of the OPCA operations. Based on those discussions, GE prepared and submitted to the EPA a list of 12 enhancements to the existing practices and activities (Attachment A). This letter expands upon that list of enhancements and serves as an Addendum to the OPCA Work Plan. The OPCA modifications and enhancements recently implemented by GE (with EPA concurrence), or to be implemented, are discussed in more detail below.

## AIR MONITORING

In accordance with the OPCA Work Plan, as well as GE's *Ambient Air Monitoring Plan* (part of its *Project Operations Plan* currently under revision), the EPA-approved air monitoring program for the OPCAs has included daily monitoring for airborne particulates and monthly monitoring for airborne PCBs during periods of active consolidation. (This monitoring program is in addition to other monitoring performed by on-site contractors as part of their project-specific health and safety monitoring program.) The monitoring program for particulates and PCBs has included monitoring/sampling at five locations situated around the OPCAs during OPCA-related activities that could potentially produce dust. The results of these monitoring efforts are provided to EPA.

The air monitoring program has included notification and action levels approved by EPA. For particulate matter, the notification level is a 10-hour average concentration of  $120 \mu\text{g}/\text{m}^3$  for particulates with a diameter less than 10 micrometers ( $\text{PM}_{10}$ ), and the action level is a 10-hour average  $\text{PM}_{10}$  concentration of  $150 \mu\text{g}/\text{m}^3$  (which is the level of the national ambient air quality standard for  $\text{PM}_{10}$ ). For PCBs, the notification and action levels have been 24-hour average concentrations of  $0.05 \mu\text{g}/\text{m}^3$  and  $0.1 \mu\text{g}/\text{m}^3$ , respectively. This program required GE to: (a) report any exceedances of these levels to EPA; (b) in the event of an exceedance of a notification level, discuss with EPA appropriate response measures; and (c) in the event of an exceedance of an action level, discuss with EPA appropriate immediate response actions (including temporary stoppage of work) and propose corrective action (e.g., use of water spray, modification of work practices, and/or suspension of work pending further evaluation).

As part of the modified OPCA monitoring efforts, GE has implemented or will implement the following operational changes:

- The former southeast monitoring location has been moved to a position directly between the OPCAs and the Allendale School property located north of the Hill 78 OPCA. The specific location of this relocated monitor (as well as two new monitors installed by EPA at the Allendale School property) are depicted on Figure 1.
- Since 1999, PCB air monitoring has been conducted on a monthly basis during periods of active consolidation at the OPCAs. However, from November 1, 2005 through December 21, 2005, GE performed PCB air monitoring on a weekly basis, regardless of whether consolidation activities were occurring. A summary of all PCB air monitoring results from 1999 through 2005 is provided in Attachment B. Starting in 2006, unless otherwise agreed between GE and EPA, GE will conduct PCB air monitoring weekly during active consolidation activities and during any activities that could potentially disturb the consolidated waste material, and monthly during all other periods (i.e., when consolidation activities are not occurring). EPA will advise GE as to which day during a given week or month (as applicable) such monitoring will be conducted.

- As GE has discussed with EPA on several occasions, high humidity levels may affect the ability of the particulate monitoring equipment to accurately measure ambient particulate levels. High relative humidity has led in some cases to apparent instrument particulate readings that are elevated, primarily due to moisture interference on the sensor. To minimize the potential impact that high humidity may have on the particulate data, GE has modified the current instruments with additional inlet controls to minimize moisture interference on the sensor, and it is currently evaluating the use of alternative instruments that effectively account for atmospheric relative humidity.
- A GE representative will conduct periodic checks of the particulate air monitors on each day of monitoring (once at approximately 9:00 a.m. and once again prior to 12:00 noon) to (a) confirm that the monitors are functioning properly; and (b) confirm that the particulate notification level of  $120 \mu\text{g}/\text{m}^3$  has not been reached. The particulate notification level is based on a daily time-weighted average. When periodic checks are conducted, an evaluation will be made based on the time-weighted average as of that time. If it is observed that the average particulate concentration is above the notification level at that time, GE will notify EPA as soon as practicable, will take appropriate steps aimed at preventing an exceedance of the action level, and will discuss with EPA the need for and type of additional response measures. However, there is no exceedance of the notification or action level unless the daily time-weighted average measured at the end of the 10-hour daily monitoring period is above that level.
- As noted above, the EPA-approved notification and action levels for PCBs have historically been 24-hour average concentrations of  $0.05 \mu\text{g}/\text{m}^3$  and  $0.1 \mu\text{g}/\text{m}^3$ , respectively. However, GE has agreed that, going forward, for the OPCA air monitoring program only (and not for any other area at the GE-Pittsfield/Housatonic River Site), the action level for PCBs will be reduced to  $0.05 \mu\text{g}/\text{m}^3$ , so that it is equivalent to the notification level.
- In the event of an exceedance of the particulate action level of  $150 \mu\text{g}/\text{m}^3$  (based on the daily time-weighted average) or the new PCB action level of  $0.05 \mu\text{g}/\text{m}^3$  for the OPCAs, GE will report such exceedance to EPA immediately upon receipt of the data showing the exceedance, temporarily cease ongoing consolidation activities, and discuss with EPA the need for and type of immediate or short-term response actions to address the exceedance. In addition, GE will evaluate the cause of the exceedance and the need for additional engineering controls, discuss that evaluation with EPA, and propose to EPA appropriate engineering controls or other corrective actions. Consolidation activities will not be resumed until EPA has approved appropriate response actions, including engineering controls if proposed.

## DUST CONTROL

In accordance with the OPCA Work Plan, the potential for dust generation at the OPCAs is controlled using a variety of measures, both temporary and permanent. During consolidation activities, dust is controlled by the use of water, calcium chloride, and temporary silt fencing (as wind barriers). Additionally, exposed soil areas are covered when not active, vehicle speeds are reduced, and work activities are minimized during windy, dry days. Daily and interim covers are also used throughout the fill progression activities to reduce dust generation.

To further address the potential for dust generation, in the event that visible dust is observed emanating from materials at the OPCAs during either operating or non-operating periods, GE will implement dust suppression measures. The specific types of dust suppression activities that may be performed include

(but are not limited to) additional water spraying, hydroseeding (with mulch and tackifier), spraying of vapor suppression foam, and/or placement of additional wind barriers (i.e., silt fencing).

In addition, GE has implemented and will continue to perform the following activities:

- Use of tarps covering consolidation materials (i.e., excavated soils and sediments and building demolition debris) or clean backfill/cover materials during transport to the OPCAs; retention of the tarps on the vehicles until immediately before offloading of materials at the OPCAs; and re-tarping of empty transport vehicles before they leave the OPCA area;
- Use of water spray during the unloading of every truck transporting materials to the OPCAs (including waste materials and clean backfill/cover materials);
- Increasing the frequency of street sweeping along the GE-owned Tyler Street Extension and the General Dynamics parking lot;
- Shut-down of OPCA consolidation operations during sustained high wind conditions (defined as sustained winds greater than 20 mph); and
- Limiting the maximum number of trucks offloading to the OPCAs to no more than 75 per day at the Building 71 OPCA and no more than 100 per day at the Hill 78 OPCA, unless EPA grants prior approval for a greater number.

#### VEHICLE ACCESS

The typical transportation route for hauling materials to the OPCAs previously accessed the consolidation areas using Tyler Street Extension, which is located between the OPCAs and the Allendale School property. The OPCA trucking route has been modified so that, beginning in 2006, transport vehicles will access the Hill 78 OPCA using Tyler Street or Merrill Road, New York Avenue, and Gate 25 located southwest of the Hill 78 OPCA. When accessing the Building 71 OPCA, access will be via Merrill Road, the General Dynamics parking lot, and the gate located on the north side of the Building 71 OPCA. This modified trucking route will result in only leachate tanker trucks traveling to or from the OPCAs along Tyler Street Extension between the OPCAs and Allendale School. The new transportation routes to and from both OPCAs are shown on Figure 2.

In addition, the modified route shown for transport to and from the Hill 78 OPCA will also be used for the transport of remediation-related waste materials from the GE-Pittsfield/Housatonic River Site (as defined in the CD) to GE's RCRA Part B-permitted hazardous waste storage facility at Building 78. These include, for example, such materials as non-aqueous-phase liquid (NAPL) (including both light and dense NAPL), filter cake from the Building 64G water treatment facility, solid materials from Removal Actions that constitute hazardous waste, oil from the oil recovery systems, and water recovered from the ground in connection with the groundwater monitoring programs and destined for off-site disposal. Similarly, the modified route shown for transport to and from the Building 71 OPCA leachate transfer facility will be used for the transport of leachate from that OPCA to the Building 64G treatment facility.

Shipments of such waste materials to or from the OPCAs or the Building 78 storage facility via the routes shown on Figure 2 will be considered to occur "onsite" within the meaning of Paragraph 9.a of the CD and thus will be subject to the onsite permitting exemption set forth in Section 121(e) of the

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and referenced in Paragraph 9.a of the CD. In these circumstances, such shipments will be carried out in accordance with the site-specific transportation procedures listed in Attachment C.

## **HOURS OF OPERATION**

GE has implemented the following modifications to the hours of OPCA operations, regardless of season:

- There will be no equipment start-up before 7:00 a.m., and no transport vehicles will enter the OPCA areas after 4:00 p.m. However, certain end-of-day activities (e.g., placement of daily cover, site cleanup, leachate hauling, etc.) may extend beyond 4:00 p.m.
- During the above-specified OPCA hours of operation, GE will limit placement of consolidation materials to one OPCA at a time (i.e., either the Hill 78 OPCA or the Building 71 OPCA, but not both simultaneously).
- Leachate collection at the Building 71 OPCA and associated trucking to and from GE's 64G treatment facility will continue as needed (i.e., day or night, including weekends), with transport via the modified transportation route shown on Figure 2.

In addition to the above changes, starting in 2006, GE will provide a representative at the OPCAs on a full-time basis during active consolidation activities and other activities that could potentially disturb the consolidated waste material.

Further, GE will, as a precautionary measure, shut down consolidation operations at the OPCAs during periods of both high ambient temperature and high humidity, or when visible ground fog or mist is present. High temperature/high humidity conditions will be defined as conditions when the ambient temperature is greater than 75°F and relative humidity is greater than 80%. The temperature and relative humidity will be monitored at the Pittsfield Municipal Airport weather station at approximately 9:00 a.m. and again prior to 12:00 noon; and if the above levels are exceeded, the OPCA consolidation activities will be suspended for the remainder of that day. This shut-down procedure will be terminated in the event that GE can demonstrate, and EPA concurs, that the use of alternative or modified particulate monitoring equipment can produce reliable particulate readings on hot, humid days without moisture/humidity interference.

## **DAILY COVER**

In accordance with the OPCA Work Plan, a daily cover is installed over the active portions of the OPCAs at the end of each working day to minimize the potential for precipitation to enter the underlying consolidation materials and the potential for migration of PCBs and other constituents via airborne dust. In general, the cover consists of polyethylene sheeting. When polyethylene sheeting is used, sandbags, tires, or other heavy objects are installed along the perimeter of the sheeting to secure the sheeting. However, on some days, wood chips have been used as a daily cover when available. In those instances, a 3- to 6-inch-thick layer of wood chips is spread over exposed consolidation materials. Although the use of wood chips as a daily cover was not originally identified in the OPCA Work Plan, EPA previously approved GE's request to use wood chips, and they have effectively served as daily cover at the OPCAs throughout the consolidation activities. Going forward, a 3- to 6-inch layer of wood chips may be used as

a daily cover at the Hill 78 OPCA (when available), but not at the Building 71 OPCA. Polyethylene sheeting will be used for daily cover at the Building 71 OPCA.

## **SITE MODIFICATIONS**

In the fall of 2005, GE planted nine additional trees to the north of the Hill 78 and Building 71 OPCAs (between the OPCAs and the Allendale School property). These trees were planted to enhance the visual barrier between the OPCAs and the Allendale School property. GE plans to continue this effort with the planting of 10 additional trees between the OPCAs and Allendale School property in 2006.

In addition, at EPA's request, GE has developed a plan to modify the approved OPCA layout, specifically the footprint of the Hill 78 OPCA. In order to preserve as many of the existing trees on the northern boundary of the Hill 78 OPCA as possible and thus to maintain the natural partition between the OPCAs and the Allendale School property, GE plans (with EPA approval) to slightly reconfigure the Hill 78 OPCA footprint. Specifically, GE is proposing to reduce the consolidation limits on the north side of the OPCA by approximately 0.24 acre, an area estimated to have the capacity to contain a volume of approximately 14,000 cubic yards (cy) of material. In addition, on the southeast side of that OPCA, GE plans to eliminate another approximate 0.16-acre portion of the footprint (estimated to have the capacity to contain approximately 5,000 cy) in order to maintain a suitable area for continued operation of the existing perimeter access road. To compensate for the capacity lost in this footprint revision (approximately 19,000 cy), an additional consolidation area of approximately 0.8 acre (with an estimated capacity of 19,000 cy) will be added to the south/southwest side of the Hill 78 OPCA. The planned revisions to the OPCA footprint are shown on Figure 3, and it is anticipated that these revisions will be included in a forthcoming Fourth Modification of the CD.

While the lateral extent of the Hill 78 OPCA will thus be increased by this modification by approximately 0.4 acre (i.e., from 5.6 to 6.0 acres), there will be no change in height or net volume at this OPCA. It should be noted that, as these modifications do not affect the Building 71 OPCA, there will be no change in the height or lateral extent (4.4 acres) of the Building 71 OPCA.

## **FINAL COVER DESIGN PLANS**

In 2005, GE initiated the installation of approximately 2.5 acres of final cover at the Building 71 OPCA, with only the installation of certain drainage features and hydroseeding remaining to be finished by late spring 2006. GE is currently preparing the engineering design for installing the final cover over the remainder of the Building 71 OPCA and the entire Hill 78 OPCA. Once completed, the design (including technical drawings, specifications, and calculations) will be provided to the EPA for its review and approval. The submittal with the design drawings will include proposed operational procedures to limit the disturbance of the consolidated waste material, and minimize potential dust generation and airborne emissions.

At this time, GE anticipates that the design will be submitted to EPA in April 2006 and that final cover construction activities can begin in early summer. However, this schedule for final cover installation is tentative and may vary based on the progress of consolidation material placement in the OPCAs.

We trust that this Addendum sufficiently documents the recently implemented and proposed additional modifications at the OPCAs, and we request EPA approval of this Addendum, including the proposal for modification of the Hill 78 OPCA layout. If you have any comments or questions, please feel free to contact me.

Sincerely,



John F. Novotny, P.E.

Manager, Facilities and Brownfields Programs

GDR/cmb

Attachments

cc: Dean Tagliaferro, EPA  
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Tom Hickey, Director, PEDA  
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*\*cover letter only*

## *Attachment A*

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# **OPCA Operations Enhancements/ Additional Requirements**

# Attachment A

## OPCA Operations – Enhancements/Additional Requirements

1. PCB air monitoring weekly instead of monthly / continue daily particulate monitoring (both during active OPCA operations). PCB air monitoring monthly during shutdown periods.
2. Moved an air monitor directly between OPCAs and school (also upgraded select particulate monitors so they are less sensitive to humidity conditions).
3. Increased dust suppression measures at OPCAs (additional water spray during unloading).
4. Increased frequency of street sweeping along GE-Owned Tyler Street Extension and parking lot.
5. Modified OPCA trucking route with EPA's approval to reduce traffic by 50% along Tyler Street Extension (treated as a one-way road for trucks into the OPCAs).
6. Limited hours of OPCA operations as follows: no equipment start-up before 7 am; last truck into the OPCA at 4 pm; other end of day activities may extend beyond 4 p.m. regarding placement of daily cover systems (regardless of season). OPCA leachate collection and associated trucking will continue as needed (day or night, including weekends).
7. Shut down of OPCA operations due to:
  - High wind conditions (e.g. 20+ mph)
  - High humidity conditions
8. Temporary shutdown of OPCAs if PCB air notification level exceeded ( $0.05 \text{ ug/m}^3$ ).
9. Limited the daily maximum truckloads to OPCA 71 cell (75 trucks), without additional approval by EPA.
10. Limited OPCA operations to one cell at a time (71 or 78 but not both).
11. Develop plan to modify approved Hill 78 footprint (in order to keep the trees on the northern boundary).
12. Planting of 10 additional trees between OPCAs and school in 2006 (in addition to 9 trees planted in Fall 2005).

## ***Attachment B***

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# **Summary of 1999 – 2005 PCB Ambient Air Sampling Results**

ATTACHMENT B

SUMMARY OF 1999 - 2005 PCB AMBIENT AIR SAMPLING RESULTS

ON-PLANT CONSOLIDATION AREAS (OPCAs)  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(all results are ug/m<sup>3</sup>)

Date	Northwest of OPCAs	Northwest of OPCAs collocated	Southwest of OPCAs	Southwest of OPCAs collocated	West of OPCAs	North of OPCAs	Southeast of OPCAs	Pittsfield Generating (CG)	Background Sample Location		
									West of 40's Bldgs.	Inside GE Gate 31 <sup>11</sup>	East of Building 9B <sup>16</sup>
<b>1999</b>											
08/08/99 - 08/09/99 <sup>1</sup>	-----	-----	0.0021	NA <sup>2</sup>	0.0009	NA <sup>3</sup>	0.0022	0.0011	-----	-----	-----
08/13/99 - 08/14/99 <sup>4</sup>	-----	-----	0.0027	0.0046 <sup>5</sup>	0.0048	0.0062	0.0019	0.0024	-----	-----	-----
09/21/99 - 09/22/99	-----	-----	0.0011	0.0017	0.0010	0.0010	0.0010	0.0011	-----	-----	-----
10/19/99 - 10/20/99	-----	-----	0.0010	0.0007	0.0013	0.0010	0.0009	0.0010	-----	-----	-----
11/17/99 - 11/18/99	-----	-----	0.0010	0.0010	0.0007	0.0007	0.0007	0.0017 <sup>6</sup>	-----	-----	-----
<b>2000</b>											
05/17/00 - 05/18/00	-----	-----	0.0018	0.0017	0.0011	-----	-----	0.0010 <sup>7</sup>	-----	-----	-----
07/20/00 - 07/21/00	-----	-----	0.0045	0.0040	0.0013	0.0018	0.0014	0.0030	0.0046	-----	-----
08/24/00 - 08/25/00	-----	-----	0.0043	0.0042	0.0333	0.0334 <sup>8</sup>	0.0015	0.0110 <sup>9</sup>	0.0135	-----	-----
09/07/00 - 09/08/00	-----	-----	0.0028	0.0031	0.0016	0.0022	0.0018	0.0125	0.0039	-----	-----
10/06/00 - 10/07/00	-----	-----	0.0008	0.0008	0.0006	0.0004	0.0004	0.0015	0.0055	-----	-----
<b>2001</b>											
06/06/01 - 06/07/01	-----	-----	0.0012	0.0010	ND	ND	ND	0.0009	0.0019	-----	-----
06/13/01 - 06/14/01	-----	-----	0.0023	0.0031	0.0026	ND	ND	0.002	0.0047	-----	-----
07/12/01 - 07/13/01	-----	-----	0.0019	0.0017	0.0009	0.0005	0.0028	0.0016	0.0014	-----	-----
12/06/01 - 12/07/01	-----	-----	0.0008	0.0005	ND	0.0008	0.0012	0.0011	0.0008	-----	-----
<b>2002</b>											
06/02/02 - 06/03/02	-----	-----	0.0017 <sup>10</sup>	0.0019 <sup>10</sup>	0.0006 <sup>10</sup>	0.0005 <sup>10</sup>	0.0071 <sup>10</sup>	0.0007 <sup>10</sup>	-----	0.0004 <sup>10</sup>	-----
06/07/02 - 06/08/02	-----	-----	0.0013	0.0009	ND	ND	ND	0.0005	-----	ND	-----
07/18/02 - 07/19/02	-----	-----	0.0038	0.0027	0.0014	0.0008	0.0023	0.0025	-----	0.002	-----
09/18/02 - 09/19/02	-----	-----	0.0127 <sup>10</sup>	0.0015 <sup>10</sup>	0.0012 <sup>10</sup>	0.0006 <sup>10</sup>	0.0059 <sup>10</sup>	0.0030 <sup>10</sup>	-----	0.0021 <sup>10</sup>	-----
12/18/02 - 12/19/02	-----	-----	ND	0.0009	ND	ND	ND	ND	-----	0.0012	-----
<b>2003</b>											
05/20/03 - 05/21/03	-----	-----	0.0025 <sup>12</sup>	0.0099 <sup>12</sup>	0.0037 <sup>12</sup>	0.0033 <sup>12</sup>	0.0007 <sup>12</sup>	0.0015 <sup>12</sup>	-----	0.0065 <sup>12</sup>	-----
06/18/03 - 06/19/03	-----	-----	0.0013	0.0011	0.0015	0.0009	0.0007	0.0017	-----	0.0028	-----
08/05/03 - 08/06/03	-----	-----	0.0020	0.0031	0.0060	0.0019	0.0019	0.0017	-----	0.0090	-----
09/15/03 - 09/16/03	-----	-----	0.0020	NA <sup>13</sup>	0.0028	ND	0.0004	0.0011	-----	0.0037	-----
09/29/03 - 09/30/03	-----	-----	0.0015	0.0015	0.0008	0.0003	0.0004	0.0005	-----	0.0010	-----
10/13/03 - 10/14/03	-----	-----	0.0011	0.0005	0.0003	NA <sup>14</sup>	0.0004	0.0003	-----	0.0010	-----

(See Notes on Page 3 of 3)

ATTACHMENT B

SUMMARY OF 1999 - 2005 PCB AMBIENT AIR SAMPLING RESULTS

ON-PLANT CONSOLIDATION AREAS (OPCAs)  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(all results are ug/m<sup>3</sup>)

Date	Northwest of OPCAs	Northwest of OPCAs colocated	Southwest of OPCAs	Southwest of OPCAs colocated	West of OPCAs	North of OPCAs	Southeast of OPCAs	Pittsfield Generating (CG)	Background Sample Location		
									West of 40's Bldgs.	Inside GE Gate 31 <sup>11</sup>	East of Building 9B <sup>16</sup>
<b>2004</b>											
05/14/04 - 05/15/04	-----	-----	0.0019	0.0013	0.0065	0.0017	0.0013	0.0040	-----	0.0038	-----
06/17/04 - 06/18/04	-----	-----	0.0032	0.0023	0.0026	0.0030	0.0065	0.0152	-----	0.0026	-----
09/13/04 - 09/14/04	-----	-----	0.0023	0.0025	0.0009	0.0006	0.0010	0.0033	-----	0.0019	-----
09/14/04 - 09/15/04	-----	-----	ND	0.0017	0.0020	ND	0.0006	0.0015	-----	0.0031	-----
10/11/04 - 10/12/04	-----	-----	0.0010	0.0011	0.0004	0.0004	0.0011	0.0007	-----	0.0004	-----
11/02/04 - 11/03/04	-----	-----	ND	ND	ND	0.0009	0.0004	0.0005	-----	0.0010	-----
12/14/04 - 12/15/04	-----	-----	NA <sup>15</sup>	NA <sup>15</sup>	ND	ND	0.0009	ND	-----	ND	-----
<b>2005</b>											
05/05/05 - 05/06/05	-----	-----	0.0009	0.0008	0.0009	0.0008	0.0009	0.0030	-----	0.0014	-----
06/01/05 - 06/02/05	-----	-----	0.0016	0.0015	0.0023	0.0012	NA <sup>17</sup>	0.0014	-----	0.0024	-----
06/29/05 - 06/30/05	-----	-----	0.0048	0.0028	0.0042	0.0020	0.0045	0.0085	-----	0.0080	-----
08/02/05 - 08/03/05	-----	-----	0.0037	0.0030	0.0029	0.0010	0.0097	0.0050 <sup>18</sup>	-----	-----	0.0012
09/01/05 - 09/02/05	-----	-----	0.0220	0.0269	0.0025	0.0015	0.0372	0.0309	-----	-----	0.0010
10/06/05 - 10/07/05	-----	-----	0.0035	0.0035	0.0039	0.0183	0.0042	0.0384	-----	-----	0.0025
10/27/05 - 10/28/05	-----	-----	0.0008	0.0010	0.0021	0.0011	0.0137 <sup>19</sup>	0.0061	-----	-----	0.0019
11/01/05 - 11/02/05	-----	-----	0.0013	0.0019	0.0016	0.0111	0.0026	0.0090	-----	-----	ND
11/08/05 - 11/09/05	-----	-----	0.0015	0.0012	0.0012	0.0011	0.0034	0.0103	-----	-----	0.0007
11/17/05 - 11/18/05	-----	-----	ND	ND	0.0008	ND	0.0014	0.0040	-----	-----	ND
11/22/05 - 11/23/05	0.0009 <sup>20</sup>	0.0008 <sup>20</sup>	-----	-----	ND	0.0003	0.0009	0.0031	-----	-----	ND
12/01/05 - 12/02/05	0.0024	0.0014	-----	-----	0.0010	0.0019	0.0011	0.0040	-----	-----	0.0015
12/06/05 - 12/07/05	ND	ND	-----	-----	ND	ND	ND	ND	-----	-----	ND
12/15/05 - 12/16/05	0.0011	0.0008	-----	-----	0.0012	0.0015	0.0005	0.0007	-----	-----	0.0005
12/20/05 - 12/21/05	ND	ND	-----	-----	0.0006	ND	0.0005	0.0012	-----	-----	ND
<b>Exceedances of Notification Level (0.05 ug/m<sup>3</sup>)</b>	None	None	None	None	None	None	None	None	None	None	None

(See Notes on Page 3 of 3)

## ATTACHMENT B

### SUMMARY OF 1999 - 2005 PCB AMBIENT AIR SAMPLING RESULTS

#### ON-PLANT CONSOLIDATION AREAS (OPCAs) GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS (all results are ug/m<sup>3</sup>)

##### Notes:

All sampling and analytical activities performed and/or coordinated by Berkshire Environmental Consultants, Inc.

NA - Not Available

ND - Non Detect (<0.0003)

- <sup>1</sup> Background (prior to site activity) sampling event conducted from 7 a.m. Sunday to 7 a.m. Monday. No soil was moved during this sampling event.
- <sup>2</sup> Co-located sampler was not in place for the first (background prior to site activity) sampling event.
- <sup>3</sup> Sample was not analyzed. Due to loss of power, the sampling period was shortened to approximately 6 hours.
- <sup>4</sup> Sampling was conducted from 7 p.m. on August 13, 1999 to 7 p.m. on August 14, 1999.
- <sup>5</sup> Sample was collected using a PUF and filter from a separate lab shipment. These samples were not used in precision calculations.
- <sup>6</sup> PCB monitor was relocated to the northeast corner of this site on November 2, 1999.
- <sup>7</sup> This sample was collected at the alternative location for the Cogeneration facility.
- <sup>8</sup> Sample does not meet criteria for validity. Value is estimated and may be biased high. Sampling was interrupted due to temporary loss of power to the air samplers after on-site soil handling activities had been completed for the day. Total volume sampled was 206.3 m<sup>3</sup>.
- <sup>9</sup> Sample does not meet criteria for validity. Value is estimated and may be biased high. Sampling was interrupted due to temporary loss of power to the air samplers after on-site soil handling activities had been completed for the day. Total volume sampled was 273.2 m<sup>3</sup>.
- <sup>10</sup> Result is believed to be biased high due to the presence of PCB on the field blank.
- <sup>11</sup> Background PCB monitoring location was permanently relocated from west of the 40's building complex in February 2002 to inside GE Gate 31 on the corner of Woodlawn Avenue and Tyler Street due to demolition activity at Building 31.
- <sup>12</sup> Result is biased high due to contamination of the laboratory method blank.
- <sup>13</sup> Sample was not collected at this site during this event. PCB sampling on this day at OPCAS was run concurrently with another PCB sampling event at Building 25. A co-located sample was collected at that site.
- <sup>14</sup> Sample did not meet validity requirements and was not analyzed. Sampler air flow was restricted.
- <sup>15</sup> Sample did not meet the QA/QC criteria of 24 hours ± 30 minutes due to a power supply interruption and is therefore not reported.
- <sup>16</sup> Background PCB monitoring location was permanently relocated from inside GE Gate 31 on the corner of Woodlawn Avenue and Tyler Street in July 2005 to East of Building 9B, between Building 9B and New York Avenue, to provide more representative background data.
- <sup>17</sup> Not available - sample voided due to condensing tube tip breakage during analysis at the laboratory. Re-extraction was not possible.
- <sup>18</sup> The PCB results from the OPCA CG site failed a laboratory QA/QC criteria. The sample failed both surrogate spike recoveries. One spike recovery failed very high at 540% (acceptable range 50-150%) and one failed very low at 1.4% (acceptable range 27-132%).
- <sup>19</sup> The PCB results from the OPCA SE site failed a laboratory QA/QC criteria. The sample failed both surrogate spike recoveries. One spike recovery failed very high at 1400% (acceptable range 50-150%) and one failed very high at 414% (acceptable range 27-132%).
- <sup>20</sup> Data are reported for informational purposes only. Sample did not meet the QA/QC criteria of 24 hours ± 30 minutes due to a power supply interruption from the generator.

# *Attachment C*

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## **Transportation Procedures**

## ATTACHMENT C

### TRANSPORTATION PROCEDURES

Transportation of remediation-related waste materials generated at the GE-Pittsfield/Housatonic River Site subject to the Consent Decree to or from GE's On-Plant Consolidation Areas (OPCAs) or the Building 78 hazardous waste storage facility at the GE Plant via the transportation routes shown on Figure 2 of this OPCA Work Plan Addendum will be conducted in accordance with the following procedures:

- The contractor conducting the shipments will be required to:
  - Employ qualified personnel trained per U.S. Department of Transportation (DOT) requirements for handling and shipping the types of materials to be transported (e.g., hazardous materials or hazardous waste), 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 with an appropriate endorsement for the type of waste to be transported;
  - Utilize trucks that are DOT-inspected;
  - Include in its Health and Safety Plan, 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 or Building 78 storage facility on a daily basis; and
  - Confirm that the materials are suitable for transport.
- For the transport of consolidation materials (i.e., building demolition debris and excavated soil and sediment), after a safety check of the truck, the truck bed will be lined with polyethylene, the materials will be placed in the truck, and the load will be covered with tarps. The load will not be uncovered until the trucks are within the OPCA footprint and are ready to dump. Empty transport vehicles will also be tarped before they leave the OPCA area. Similar to transport vehicles hauling building demolition debris and excavated soil and sediment, transport vehicles hauling clean backfill or cover materials will also be tarped when traveling to the OPCAs, and empty transport vehicles will be re-tarped before leaving the OPCA area.
- A Bill of Lading (BOL) will be prepared and signed by the truck driver. However, since the transport will occur entirely "onsite" (as discussed in the text of this Addendum), a manifest is not required.
- After another safety check of the vehicle and placarding, the truck will leave the site and proceed to the appropriate OPCA or Building 78 storage facility utilizing the applicable route shown on Figure 2 of this OPCA Work Plan Addendum. Vehicles transporting consolidation materials to the Building 71 OPCA will be placarded with a Class 9 UN 3432 placard in accordance with 49 CFR 172.504 (see attached figure), and a PCB ML Marker in accordance with 40 CFR 761.40.

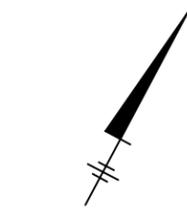
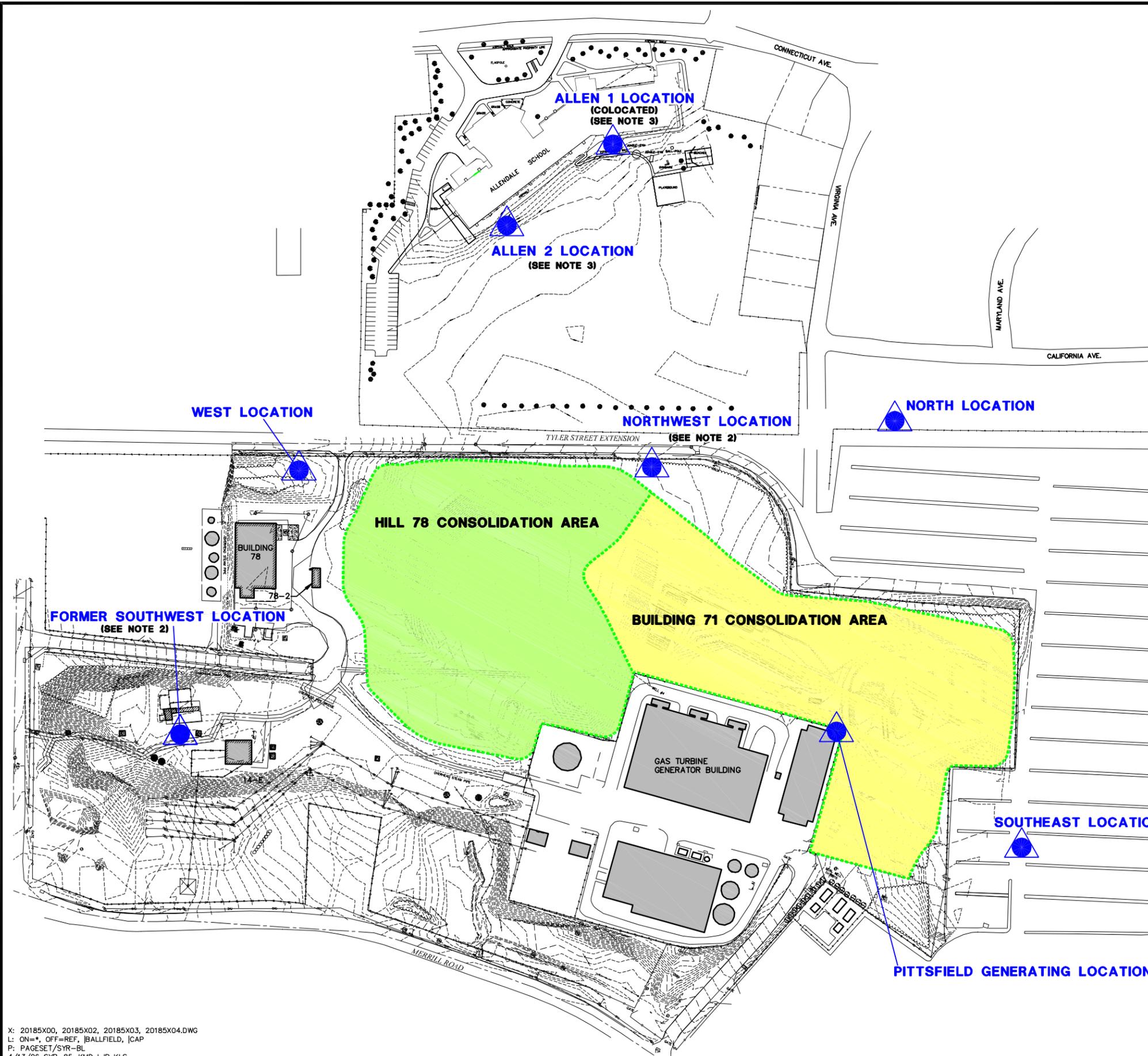
- Upon arrival of the transport vehicle at the appropriate OPCA or the Building 78 hazardous waste storage facility, the OPCA or storage facility contractor (as appropriate) will document receipt of the load and the material will be off-loaded and placed by that contractor.
- Prior to leaving either OPCA, a visual inspection of each transport vehicle will be performed. Accumulations of soil or sediment on the vehicle tires or other exterior surfaces will be removed manually or, if necessary, by using a high pressure water spray.

# CLASS 9 UN 3432 PLACARD



# *Figures*

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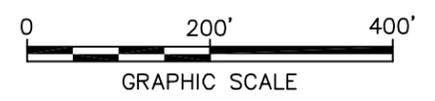


**LEGEND:**

-  EXISTING BUILDING OR STRUCTURE
-  EXISTING ROADS
-  EXISTING FENCE
-  APPROXIMATE LOCATION OF PCB AIR MONITORING STATIONS
-  APPROXIMATE LIMIT OF ANTICIPATED FUTURE CONSOLIDATION AREA FOOTPRINT

**NOTE:**

1. NOT ALL PHYSICAL FEATURES ARE SHOWN.
2. THE SOUTHWEST PCB AIR MONITORING STATION WAS MOVED TO THE NORTHWEST LOCATION ON NOVEMBER 21, 2005.
3. THE PCB AIR MONITORING STATIONS ADJACENT TO THE ALLENDALE SCHOOL WERE INSTALLED ON DECEMBER 5, 2005.

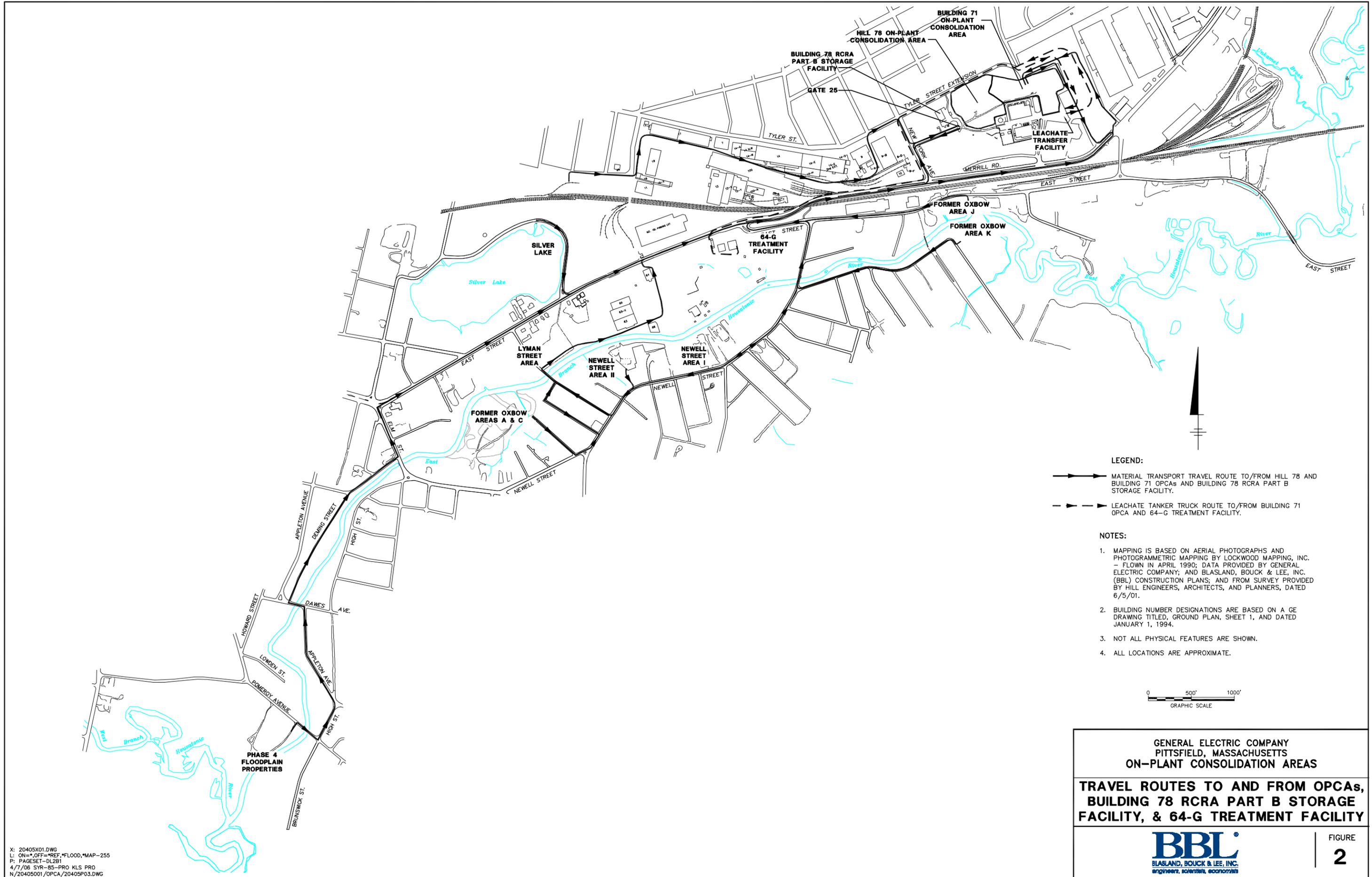


GENERAL ELECTRIC COMPANY,  
PITTSFIELD MASSACHUSETTS  
**BUILDING 71 AND HILL 78 ON-PLANT  
CONSOLIDATION AREAS**

**APPROXIMATE LOCATION OF PCB  
AIR MONITORING STATIONS**



X: 20185X00, 20185X02, 20185X03, 20185X04.DWG  
L: ON=\*, OFF=REF, BALLFIELD, CAP  
P: PAGESET/SYR-BL  
4/13/06 SYR-85-KMD LJP KLS  
N/20185003/REPORT/20185G18.DWG



**LEGEND:**

-  MATERIAL TRANSPORT TRAVEL ROUTE TO/FROM HILL 78 AND BUILDING 71 OPCAs AND BUILDING 78 RCRA PART B STORAGE FACILITY.
-  LEACHATE TANKER TRUCK ROUTE TO/FROM BUILDING 71 OPCA AND 64-G TREATMENT FACILITY.

**NOTES:**

1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1990; DATA PROVIDED BY GENERAL ELECTRIC COMPANY; AND BLASLAND, BOUCK & LEE, INC. (BBL) CONSTRUCTION PLANS; AND FROM SURVEY PROVIDED BY HILL ENGINEERS, ARCHITECTS, AND PLANNERS, DATED 6/5/01.
2. BUILDING NUMBER DESIGNATIONS ARE BASED ON A GE DRAWING TITLED, GROUND PLAN, SHEET 1, AND DATED JANUARY 1, 1994.
3. NOT ALL PHYSICAL FEATURES ARE SHOWN.
4. ALL LOCATIONS ARE APPROXIMATE.



GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**ON-PLANT CONSOLIDATION AREAS**  
**TRAVEL ROUTES TO AND FROM OPCAs,**  
**BUILDING 78 RCRA PART B STORAGE**  
**FACILITY, & 64-G TREATMENT FACILITY**



X: 20405X01.DWG  
 L: ON=P, OFF=REF, \*FLOOD, \*MAP-255  
 P: PAGESET-DL2B1  
 4/7/06 SYR-85-PRO KLS PRO  
 N/20405001/OPCA/20405P03.DWG

VOLUME LOST

SECTION A-A'  
NOT TO SCALE

VOLUME GAINED

SECTION B-B'  
NOT TO SCALE

HILL 78 CONSOLIDATION AREA

APPROXIMATE VOLUME LOST  
BY FOOTPRINT REVISION  
14,000 cy

APPROXIMATE VOLUME  
GAINED BY FOOTPRINT  
REVISION 19,000 cy

BUILDING 71  
CONSOLIDATION AREA

APPROXIMATE  
VOLUME LOST BY  
PERIMETER  
ACCESS ROAD  
5,000 cy

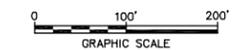


LEGEND:

-  EXISTING BUILDING OR STRUCTURE
-  EXISTING ROADS
-  NON-TSCA/NON-RCRA AREA
-  TSCA/RCRA AND NON-TSCA/NON-RCRA AREA
-  APPROXIMATE LIMIT OF APPROVED CONSOLIDATION AREA FOOTPRINT
-  APPROXIMATE LIMIT OF REVISED CONSOLIDATION AREA FOOTPRINT
-  EXISTING SECURITY FENCE

NOTES:

1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1990; DATA PROVIDED BY GENERAL ELECTRIC COMPANY; AND BLASLAND, BOUCK & LEE, INC. (BBL) CONSTRUCTION PLANS, AND ON OBSERVATIONS DURING A SITE VISIT BY BBL PERSONNEL ON DECEMBER 3, 1997.
2. SITE BOUNDARIES ARE APPROXIMATE.
3. NOT ALL PHYSICAL FEATURES SHOWN.



GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
ON-PLANT CONSOLIDATION AREAS

REVISED ON-PLANT  
CONSOLIDATION AREA FOOTPRINT

