



GE
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Pittsfield, MA 01201
USA

Transmitted Via Overnight Courier

January 30, 2007

Mr. Dean Tagliaferro
EPA Project Coordinator
U.S. Environmental Protection Agency
c/o Weston Solutions, Inc.
10 Lyman Street, Suite 2
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
Hill 78 & Building 71 On-Plant Consolidation Areas (GEC210)
Tier III Ambient Air Monitoring Data Validation Report**

Dear Mr. Tagliaferro:

In accordance with EPA's November 8, 2006 comment letter regarding General Electric's (GE's) February 10, 2006 *Proposed Revisions to the Field Sampling Plan/Quality Assurance Project Plan, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts*, GE has conducted a Tier III data validation of approximately 10 percent of the PCB analytical data for ambient air samples collected from the monitors around the Hill 78 and Building 71 On-Plant Consolidation Areas (OPCAs) from June 1, 2006 through November 30, 2006 and analyzed for PCBs by EPA Method TO-4.

A detailed Tier III data validation report on these data and a tabulated summary of the Tier III validated results for the 2006 PCB ambient air samples from the OPCA monitors are attached. As described in the attached data validation report, for the sample results that were previously included in GE's Tier I and II data validation report submitted on December 7, 2006, the Tier III data validation process did not result in any additional qualifications of the data. In addition, the Tier III validation of the results from a November 2006 sampling event (which were not previously subject to data validation) resulted in only minor qualification of the data. The data subjected to this Tier III data validation have been found to be 100% usable.

Please contact me if you have any questions regarding these results.

Sincerely,

A handwritten signature in black ink that reads "Richard Gates/TMG".

Richard W. Gates
Remediation Project Manager

Attachments

V:\GE_Pittsfield_CD_OPCAs\Reports and Presentations\Tier III\069711324Ltr.doc

cc: Richard Hull, EPA
Tim Conway, EPA
John Kilborn, EPA
Holly Inglis, EPA
Rose Howell, EPA*
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Linda Palmieri, Weston (2 copies)
Tom Hickey, Director, PED A
Mayor James Ruberto, City of Pittsfield

Pittsfield Department of Health
Jeffrey Bernstein, Bernstein, Cushner & Kimmel
Teresa Bowers, Gradient
Michael Carroll, GE*
Andrew Silber, GE
Roderic McLaren, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter
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Summary of Analytical Results

Hill 78/Building 71 On-Plant Consolidation Areas (OPCA)

General Electric Company - Pittsfield, Massachusetts
(all results are ug/m3)

Date	Northwest of OPCAs	Northwest of OPCAs collocated	West of OPCAs	West of OPCAs collocated	North of OPCAs	Southeast of OPCAs	Pittsfield Generating (PGE)	Data Validated?
06/27/06 - 06/28/06	0.0036 J	-----	0.0021 J	0.0019 J	0.0026 J	0.0006 J	0.0018 J	Tier III
08/03/06 - 08/04/06	0.0010	-----	0.0017	0.0023	0.0013	0.0030	0.0107	Tier III
09/14/06 - 09/15/06	0.0008 ¹	-----	0.0011 ¹	0.0011 ¹	0.0007 ¹	0.0004 ¹	0.0009 ¹	Tier III
10/10/06 - 10/11/06	0.0005 FB ¹	-----	0.0006 FB ¹	0.0036 FB	0.0058 FB	0.0174 FBEJ	0.0009 FB ¹	Tier III
11/09/06 - 11/10/06	ND	-----	0.0004 ¹	0.0003 ¹	ND	ND	0.0005 ¹	Tier III
Exceedances of Notification Level (0.05 µg/m³)	None	None	None	None	None	None	None	

Notes:

All sampling activities performed by Berkshire Environmental Consultants, Inc. All analytical activities performed by SGS Environmental Services, Inc. or Northeast Analytical, Inc.

E - The compound was quantitated above the calibration range.

J - Sample results were qualified as estimated based on data validation.

FB - Field blank Contamination. Several samples exhibited an Aroclor 1242 pattern attributable to cross contamination of the samples in the extraction preparation lab.

Several extremely high concentration PCB oil samples originating from a non-associated project were processed in the area coincident with sample preparation of the PUFs.

¹ Laboratory qualification (AF): Aroclor 1254 is being reported as the best Aroclor match. The sample exhibits an altered PCB pattern.

Tier III Data Validation Report

Selected Ambient Air Monitoring Data – June 1, 2006 through November 30, 2006 Hill 78 & Building 71 On-Plant Consolidation Areas General Electric Company Pittsfield, Massachusetts

1.0 General

In a letter to the General Electric Company (GE) dated November 8, 2006, regarding GE's February 10, 2006 Proposed Revisions to the Field Sampling Plan/Quality Assurance Project Plan (Proposed FSP/QAPP Revisions), the United States Environmental Protection Agency (USEPA) directed GE to conduct certain data validation activities for the analytical data on polychlorinated biphenyls (PCBs) for ambient air samples collected at monitors around the Hill 78 and Building 71 On-Plant Consolidation Areas (OPCAs) located in Pittsfield, Massachusetts. Specifically, USEPA directed GE to: (a) conduct Tier II data validation on 100% of the PCB data collected from these monitors beginning in January 2006; (b) submit within 30 days a report on that data validation for data for which GE received analytical data packages by the date of USEPA's letter; (c) conduct Tier III data validation on 10% of the PCB data collected from these monitors between June 1 and November 30, 2006; and (d) submit a preliminary report on that Tier III data validation within 45 days and a complete report on that Tier III data validation by January 31, 2007.

On December 7, 2006, GE submitted a Tier I and II data validation report for all the PCB analytical data collected from these air monitors from January 10 through October 18, 2006. Subsequently, on December 21, 2006, GE submitted a preliminary Tier III data validation report on the PCB air data from 24 selected samples collected from these monitors from June 1 through October 11, 2006. The present document constitutes GE's complete report on the Tier III data validation performed on the PCB data from approximately 10% of the ambient air samples collected from the OPCA monitors between June 1 and November 30, 2006. These data were analyzed for PCBs, using USEPA Method TO-4A, by SGS Environmental Services, Inc. (formerly Paradigm Analytical Labs, Inc.) of Wilmington, North Carolina, and Northeast Analytical Laboratories, Inc. of Schenectady, New York.

The Tier III data validation was performed on the results from 30 randomly selected PCB samples collected during this period. The specific samples for which this Tier III data validation was performed were those collected from the six on-site OPCA monitors and included in five sample delivery groups (SDGs) – i.e., those for June 27-28, August 3-4, September 14-15, October 10-11, and November 9-10, 2006. With the exception of the November 9-10, 2006 sampling results, these data had previously been subjected to Tier I and II evaluation, as described in GE's December 7, 2006 report. This report summarizes the results of the Tier III validation performed for these data.

2.0 Data Validation Procedures

This report outlines the applicable quality control criteria utilized during the data review process and any deviations from those criteria. The Tier III data validation was conducted in accordance with the following documents:

- Data Validation Procedures for Analyses of Polychlorinated Biphenyls(PCBs), Validation Annex F in February 10, 2006 Proposed FSP/QAPP Revisions (Validation Annex F) (Section V);
- Region I Tiered Organic and Inorganic Data Validation Guidelines, USEPA Region I (July 1, 1993);
- Region I Laboratory Data Validation Functional Guidelines for Evaluating Organics Analyses, USEPA Region I (February 1, 1988) (Modified November 1, 1988); and
- Region I Laboratory Data Validation Functional Guidelines for Evaluating Organics Analyses, USEPA Region I (Draft, December 1996).

A tabulated summary of the Tier III data validation is presented in Table 1. Each sample subjected to evaluation is listed in Table 1 to document that data review was performed. Samples that required data qualification are listed separately for each parameter (compound) that required qualification.

The following data qualifiers were used in this data evaluation:

- J The compound was positively identified, but the associated numerical value is an estimated concentration. This qualifier is used when the data evaluation procedure identifies a deficiency in the data generation process. This qualifier is also used when a compound is detected at an estimated concentration less than the corresponding practical quantitation limit (PQL).
- U The compound was analyzed for, but was not detected. The sample quantitation limit is presented and adjusted for dilution and (for solid samples only) percent moisture. Non-detect sample results are presented as ND(PQL) within this report and in Table 1 for consistency with documents previously prepared for investigations conducted at the GE-Pittsfield/Housatonic River Site.
- UJ The compound was not detected above the reported sample quantitation limit. However, the reported limit is estimated and may or may not represent the actual level of quantitation. Non-detect sample results that required qualification are presented as ND(PQL)
- R Indicates that the previously reported detection limit or sample result has been rejected due to a major deficiency in the data generation procedure. The data should not be used for any qualitative or quantitative purpose.
- FB Indicates that contamination was present in the field blank, and that detected sample results were below the blank action level, as discussed further below.

- E Indicates that the compound was quantitated above the calibration range, as discussed further below.

Tier III data validation is performed following, and builds upon, the Tier I and Tier II validation process and includes a more thorough examination of the data. The Tier III data validation conducted on these samples results included a completeness evidence audit, as outlined in the USEPA Region I CSF Completeness Evidence Audit Program (USEPA Region I, 7/31/91), to ensure that all laboratory data and documentation were present and a review of all data package summary forms for identification of quality assurance/quality control (QA/QC) deviations and qualification of the data according to the Region I Data Validation Functional Guidelines. The Tier III validation also included evaluation of compound identification, instrument performance, quantitation, and detection limits, as well as review of the “raw data” and recalculation of the analytical results from the samples subject to this procedure. In the event data packages were determined to be incomplete, the missing information was requested from the laboratory.

Similar to the prior Tier II review of the OPCA air data, the Tier III review resulted in the qualification of data for several samples due to minor QA/QC deficiencies. Additionally, all co-located field duplicates were examined for relative percent difference (RPD) compliance with the criteria specified in Validation Annex F. A tabulated summary of the samples subjected to Tier III data validation process is presented in the following table.

Parameter	Tier III			Total
	Samples	Co-located Field Duplicates	Blanks	
EPA TO-4A	25	5	0	30
Total	25	5	0	30

When qualification of the sample data was required, the sample results associated with a QA/QC parameter deviation were qualified in accordance with the procedures outlined in USEPA Region I data validation guidance documents. When the data validation process identified several quality control deficiencies, the cumulative effect of the various deficiencies was employed in assigning the final data qualifier. A summary of the QA/QC parameter deviations that resulted in data qualification is presented below for each analytical method.

3.0 Data Review

Laboratory Control Sample/Laboratory Control Sample Duplicate (LCS/LCSD) analysis recovery criteria for organics must be within the laboratory-generated QC acceptance limits specified on the LCS reporting form. Sample results associated with the LCS/LCSD that exceeded laboratory-generated QC acceptance limits were qualified as estimated. The analytical results that did not meet LCS/LCSD recovery criteria and the number of samples qualified due to those deviations are presented in the following table.

Analysis Qualified Due to LCS/LCSD Recovery Deviations

Analysis	Analysis	Number of Affected Samples	Qualification
EPA TO-4A (PCBs)	Aroclor-1016	6	J
	Aroclor-1221	6	J
	Aroclor-1232	6	J
	Aroclor-1242	6	J
	Aroclor-1248	6	J
	Aroclor-1254	6	J
	Aroclor-1260	6	J
	Total PCBs	6	J

Blank action levels (BALs) for organic compounds detected in the field blanks were calculated at five times the field blank concentration. Detected sample results that were below the blank action level were qualified with an "FB." This qualification was applied only to data from October 10-11, 2006. It should be noted that the laboratory case narrative associated with samples collected on October 10-11 contained the following statement: "Several samples exhibited an Aroclor 1242 pattern attributable to cross contamination of the samples in the extraction preparation lab. Several extremely high concentration PCB oil samples originating from a non-associated project were processed in the area coincident with sample preparation of the PUFs." In addition, Aroclor 1254 was detected in the field blank by the laboratory. Although corrective actions were taken by the laboratory to avoid any future cross-contamination of PUF samples, cross-contamination of the samples collected on October 10-11 by Aroclor 1242 and/or Aroclor 1254 is highly suspected. The associated method blank data exhibited a result of non-detect; therefore, the detection of Aroclor 1242 and Aroclor 1254 in the field blank associated with these samples was the only documentation of potential laboratory contamination. The compounds detected in field blanks which resulted in qualification of sample data, along with the number of affected samples, are presented in the following table.

Compounds Qualified Due to Field Blank Deviations

Analysis	Compound	Number of Affected Samples	Qualification
EPA TO-4A (PCBs)	Aroclor-1242	3	FB
	Aroclor-1254	3	FB
	Total PCBs	6	FB

The quantitation criteria require that detected organic sample results be quantitated within the range of the five-point calibration. Detected sample results which are above the linear range of the calibration are required to be re-analyzed at a dilution yielding a sample result within the linear range of the calibration (preferably at the midpoint). Sample data for detected compounds which were not re-analyzed at a dilution within the calibration range were qualified as estimated (EJ). A summary of the compounds that exceeded quantitation criteria and the number of samples qualified due to those deviations are identified below.

Compounds Qualified Due to Quantitation Criteria

Analysis	Compound	Number of Affected Samples	Qualification
EPA TO-4A (PCBs)	Aroclor-1242	1	EJ

Surrogate compounds are analyzed with every organic sample to aid in evaluation of the sample extraction efficiency. As specified in Validation Annex F, at least one of the PCB surrogate compounds must have a recovery between laboratory-specified control limits. Sample results associated with surrogates that exhibited recoveries less than control limits and greater than 10% were qualified as estimated (J). A summary of the compounds affected by surrogate recovery exceedences and the number of samples qualified due to those deviations are presented in the following table.

Compounds Qualified Due to Surrogate Recovery Deviations

Analysis	Analysis	Number of Affected Samples	Qualification
EPA TO-4A (PCBs)	Aroclor-1016	1	J
	Aroclor-1221	1	J
	Aroclor-1232	1	J
	Aroclor-1242	1	J
	Aroclor-1248	1	J
	Aroclor-1254	1	J
	Aroclor-1260	1	J
	Total PCBs	1	J

Aroclor identification criteria require that the Aroclor pattern resemble that of the pattern established throughout the analysis of the standards of the target Aroclors. Sample results qualified by the laboratory (i.e. Aroclor-1248 not present) were reviewed for Aroclor identification. Sample data that did not match Aroclor patterns that were established through the analysis of target Aroclor standards were qualified with a "U" [and reported in Table 1 as ND(PQL)], and the Total PCB content was adjusted to reflect the qualification of the Aroclor as non-detect. The PCB compound that did not meet Aroclor identification criteria and the number of samples qualified due to those deviations are presented in the following table.

Compounds Qualified Due to Aroclor Identification Deviations

Analysis	Compound	Number of Affected Samples	Qualification
EPA TO-4A (PCBs)	Aroclor-1248	15	U

Overall, for the data that were previously included in the Tier I/II data validation report submitted on December 7, 2006, the Tier III data validation did not result in any additional qualifications of the sample results beyond those reported in the Tier I/II validation report. For the November 9-10, 2006 sampling data (which were not previously subject to data validation procedures), the Tier III data validation resulted in only minor qualification of the results, based only on the reporting of "Aroclor-1248 not present."

4.0 Overall Data Usability

This section summarizes the analytical data in terms of its completeness and usability for site characterization purposes. Data completeness is defined as the percentage of sample results that have been determined to be usable during the data validation process. The percent usability calculation included analyses evaluated under the Tier III data validation procedures. Data completeness with respect to usability was calculated separately for inorganic and each of the organic analyses. The percent usability calculation also includes quality control samples collected to aid in the evaluation of data usability.

Data Usability		
Parameter	Percent Usability	Rejected Data
EPA TO-4A	100%	None

The data package completeness, as determined from the Tier III data validation, was used to determine overall data quality. As specified in GE's approved Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP), the overall precision, accuracy, representativeness, comparability, and completeness (PARCC) parameters determined from the Tier III data validation were used as indicators of overall data quality. These parameters were assessed through an evaluation of the results of the field and laboratory QA/QC sample analyses to provide a measure of compliance of the analytical data with the Data Quality Objectives (DQOs) specified in the FSP/QAPP. Therefore, the following sections present summaries of the PARCC parameters assessment with regard to the DQOs specified in the FSP/QAPP.

5.1 Precision

Precision measures the reproducibility of measurements under a given set of conditions. Specifically, it is a quantitative measure of the variability of a group of measurements compared to their average value. For this investigation, precision was defined as the RPD between co-located field duplicate sample results. The duplicate samples used to evaluate precision included field duplicates. For the analytical results evaluated here, none of the data required qualification due to co-located field duplicate deviations.

5.2 Accuracy

Accuracy measures the bias in an analytical system or the degree of agreement of a measurement with a known reference value. For this investigation, accuracy was defined as the percent recovery of QA/QC samples that were spiked with a known concentration of an analyte or compound of interest. The QA/QC samples used to evaluate analytical accuracy included instrument calibration, Laboratory Control Sample/Laboratory Control Sample Duplicate (LCS/LCSD), and surrogate compound recoveries. For the analytical results evaluated here, 20.0% of the data required qualification due to LCS/LCSD recovery, and 2.5% required qualification due to surrogate compound recovery deviations. None of the data required qualification due to instrument calibration deviations.

5.3 Representativeness

Representativeness expresses the degree to which sample data accurately and precisely represents a characteristic of a population, parameter variations at a sampling point, or an environmental condition. Representativeness is a qualitative parameter, which is most concerned with the proper design of the sampling program. The representativeness criterion is best satisfied by making certain that sampling locations are selected properly and a sufficient number of samples are collected. This parameter has been addressed by collecting samples at locations specified in USEPA-approved work plans, and by following the USEPA-approved procedures for sample collection/analyses. Additionally, the analytical program used procedures consistent with USEPA-approved analytical methodology. A QA/QC parameter that is an indicator of the representativeness of a sample is holding time. Holding time criteria are established to maintain the samples in a state that is representative of the in-situ field conditions before analysis. For the analytical results evaluated here, none of the data required qualification due to holding time deviations.

5.4 Comparability

Comparability is a qualitative parameter expressing the confidence with which one data set can be compared with another. This goal was achieved through the use of the standardized techniques for sample collection and analysis presented in the FSP/QAPP. The USEPA analytical methods presented in the FSP/QAPP are updated on occasion by the USEPA to benefit from recent technological advancements in analytical chemistry and instrumentation. In most cases, the method upgrades include the incorporation of new technology that improves the sensitivity and stability of the instrumentation or allows the laboratory to increase throughput without hindering accuracy and precision. Overall, the analytical methods for OPCA air monitoring program have remained consistent in their general approach through continued use of the basic analytical techniques (e.g., sample extraction/preparation, instrument calibration, QA/QC procedures). Through this use of consistent base analytical procedures and by requiring that updated procedures meet the QA/QC criteria specified in the FSP/QAPP, the analytical data from past, present, and future sampling events will be comparable to allow for qualitative and quantitative assessment of site conditions.

5.5 Completeness

Completeness is defined as the percentage of measurements that are judged to be valid or usable to meet the prescribed DQOs. The completeness criterion is essentially the same for all data uses -- the generation of a sufficient amount of valid data. This analytical data set subject to the Tier III data validation had an overall usability of 100%.

Table 1
Analytical Data Validation Summary

Hill 78/Building 71 On-Plant Consolidation Areas (OPCA)

General Electric Company - Pittsfield, Massachusetts
(Results are presented in micrograms per PUF, ug/PUF)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes						
EPA TO-4A																	
G782-8	NW-062806-012	6/28/2006	Air	Tier III	Yes	Aroclor-1016	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Aroclor-1221	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Aroclor-1232	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Aroclor-1242	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Aroclor-1248	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Aroclor-1254	LCS %R (Aroclor-1254)	45.0%	65% to 125%	1.16 J							
						Aroclor-1260	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Total PCBs	LCS %R (Aroclor-1254)	45.0%	65% to 125%	1.16 J							
						G782-8	W-062806-301	6/28/2006	Air	Tier III	Yes	Aroclor-1016	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J	
												Aroclor-1221	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J	
Aroclor-1232	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Aroclor-1242	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Aroclor-1248	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Aroclor-1254	LCS %R (Aroclor-1254)	45.0%	65% to 125%	0.661 J													
Aroclor-1260	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Total PCBs	LCS %R (Aroclor-1254)	45.0%	65% to 125%	0.661 J													
G782-8	WCO-062806-006	6/28/2006	Air	Tier III	Yes							Aroclor-1016	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J	
												Aroclor-1221	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J	
						Aroclor-1232	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Aroclor-1242	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Aroclor-1248	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Aroclor-1254	LCS %R (Aroclor-1254)	45.0%	65% to 125%	0.612 J							
						Aroclor-1260	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Total PCBs	LCS %R (Aroclor-1254)	45.0%	65% to 125%	0.612 J							
						G782-8	N-062806-002	6/28/2006	Air	Tier III	Yes	Aroclor-1016	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J	
												Aroclor-1221	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J	
Aroclor-1232	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Aroclor-1242	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Aroclor-1248	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Aroclor-1254	LCS %R (Aroclor-1254)	45.0%	65% to 125%	0.826 J													
Aroclor-1260	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Total PCBs	LCS %R (Aroclor-1254)	45.0%	65% to 125%	0.826 J													
G782-8	SE-062806-202	6/28/2006	Air	Tier III	Yes							Aroclor-1016	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J	
												Aroclor-1221	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J	
						Aroclor-1232	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Aroclor-1242	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Aroclor-1248	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Aroclor-1254	LCS %R (Aroclor-1254)	45.0%	65% to 125%	0.188 J							
						Aroclor-1260	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J							
						Total PCBs	LCS %R (Aroclor-1254)	45.0%	65% to 125%	0.188 J							
						G782-8	PGE-062806-303	6/28/2006	Air	Tier III	Yes	Aroclor-1016	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J	
												Aroclor-1016	Surrogate Recovery (TCMX, DCBP)	56.0%, 42.0%	60% to 120%	ND(0.10) J	
Aroclor-1221	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Aroclor-1221	Surrogate Recovery (TCMX, DCBP)	56.0%, 42.0%	60% to 120%	ND(0.10) J													
Aroclor-1232	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Aroclor-1232	Surrogate Recovery (TCMX, DCBP)	56.0%, 42.0%	60% to 120%	ND(0.10) J													
Aroclor-1242	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Aroclor-1242	Surrogate Recovery (TCMX, DCBP)	56.0%, 42.0%	60% to 120%	ND(0.10) J													
Aroclor-1248	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Aroclor-1248	Surrogate Recovery (TCMX, DCBP)	56.0%, 42.0%	60% to 120%	ND(0.10) J													
Aroclor-1254	LCS %R (Aroclor-1254)	45.0%	65% to 125%	0.578 J													
Aroclor-1254	Surrogate Recovery (TCMX, DCBP)	56.0%, 42.0%	60% to 120%	0.578 J													
Aroclor-1260	LCS %R (Aroclor-1254)	45.0%	65% to 125%	ND(0.10) J													
Aroclor-1260	Surrogate Recovery (TCMX, DCBP)	56.0%, 42.0%	60% to 120%	ND(0.10) J													
Total PCBs	LCS %R (Aroclor-1254)	45.0%	65% to 125%	0.578 J													
Total PCBs	Surrogate Recovery (TCMX, DCBP)	56.0%, 42.0%	60% to 120%	0.578 J													
G782-25	NW-080406-012	8/4/2006	Air	Tier III	No												
G782-25	W-080406-301	8/4/2006	Air	Tier III	No												
G782-25	WCO-080406-006	8/4/2006	Air	Tier III	No												
G782-25	N-080406-002	8/4/2006	Air	Tier III	No												
G782-25	SE-080406-202	8/4/2006	Air	Tier III	No												
G782-25	PGE-080406-303	8/4/2006	Air	Tier III	No												
06090076	NW-091506-012	9/15/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.299	-	ND(0.10)							
						Total PCBs	Aroclor-1248 not present	0.567	-	0.268							
06090076	W-091506-301	9/15/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.332	-	ND(0.10)							
						Total PCBs	Aroclor-1248 not present	0.693	-	0.361							

Table 1
Analytical Data Validation Summary

Hill 78/Building 71 On-Plant Consolidation Areas (OPCA)

General Electric Company - Pittsfield, Massachusetts
(Results are presented in micrograms per PUF, ug/PUF)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
EPA TO-4A Continued											
06090076	WCO-091506-006	9/15/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.299	-	ND(0.10)	
						Total PCBs	Aroclor-1248 not present	0.652	-	0.353	
06090076	N-091506-002	9/15/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.239	-	ND(0.10)	
						Total PCBs	Aroclor-1248 not present	0.456	-	0.217	
06090076	SE-091506-202	9/15/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.188	-	ND(0.10)	
						Total PCBs	Aroclor-1248 not present	0.333	-	0.145	
06090076	PGE-091506-303	9/15/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.287	-	ND(0.10)	
						Total PCBs	Aroclor-1248 not present	0.575	-	0.288	
06100069	NW-101106-012	10/11/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.149	-	ND(0.10)	
						Aroclor-1254	Field Blank Contamination	0.155	BAL(0.935)	0.155 FB	
						Total PCBs	Aroclor-1248 not present	0.304	-	0.155	
						Total PCBs	Field Blank Contamination	0.304	BAL(0.935)	0.155 FB	
06100069	W-101106-301	10/11/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.156	-	ND(0.10)	
						Aroclor-1254	Field Blank Contamination	0.202	BAL(0.935)	0.202 FB	
						Total PCBs	Aroclor-1248 not present	0.358	-	0.202	
						Total PCBs	Field Blank Contamination	0.358	BAL(0.935)	0.202 FB	
06100069	WCO-101106-006	10/11/2006	Air	Tier III	Yes	Aroclor-1242	Field Blank Contamination	1.15	BAL(8.05)	1.15 FB	
						Total PCBs	Field Blank Contamination	1.15	BAL(8.05)	1.15 FB	
06100069	N-101106-002	10/11/2006	Air	Tier III	Yes	Aroclor-1242	Field Blank Contamination	1.84	BAL(8.05)	1.84 FB	
						Total PCBs	Field Blank Contamination	1.84	BAL(8.05)	1.84 FB	
06100069	SE-101106-202	10/11/2006	Air	Tier III	Yes	Aroclor-1242	Field Blank Contamination	5.51 E	BAL(8.05)	5.51 FBEJ	
						Total PCBs	Field Blank Contamination	5.51 E	BAL(8.05)	5.51 FBEJ	
06100069	PGE-101106-303	10/11/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.341	-	ND(0.10)	
						Aroclor-1254	Field Blank Contamination	0.291	BAL(0.935)	0.291 FB	
						Total PCBs	Aroclor-1248 not present	0.632	-	0.291	
						Total PCBs	Field Blank Contamination	0.632	BAL(0.935)	0.291 FB	
06110071	NW-111006-012	11/10/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.126	-	ND(0.10)	
						Total PCBs	Aroclor-1248 not present	0.126	-	ND(0.10)	
06110071	W-111006-301	11/10/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.114	-	ND(0.10)	
						Total PCBs	Aroclor-1248 not present	0.230	-	0.116	
06110071	WCO-111006-006	11/10/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.110	-	ND(0.10)	
						Total PCBs	Aroclor-1248 not present	0.215	-	0.105	
06110071	N-111006-002	11/10/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.124	-	ND(0.10)	
						Total PCBs	Aroclor-1248 not present	0.124	-	ND(0.10)	
06110071	SE-111006-202	11/10/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.140	-	ND(0.10)	
						Total PCBs	Aroclor-1248 not present	0.140	-	ND(0.10)	
06110071	PGE-111006-303	11/10/2006	Air	Tier III	Yes	Aroclor-1248	Aroclor-1248 not present	0.132	-	ND(0.10)	
						Total PCBs	Aroclor-1248 not present	0.284	-	0.152	

BAL = Blank Action Level