



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted via Overnight Courier*

September 18, 2008

Mr. Richard Hull  
U.S. Environmental Protection Agency  
EPA New England  
One Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
Hill 78 Area-Remainder (GECD160)  
Addendum to Final RD/RA Work Plan**

Dear Mr. Hull:

On June 20, 2008, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) the *Final Removal Design/Removal Action Work Plan for Hill 78 Area-Remainder* (Final RD/RA Work Plan). The Final RD/RA Work Plan included responses to certain conditions specified by EPA in its April 23, 2008 letter conditionally approving GE's the February 2008 *Conceptual Removal Design/Removal Action Work Plan for Hill 78 Area-Remainder* (Conceptual Work Plan), a summary of the pre-design investigation activities performed at the Hill 78 Area-Remainder Removal Action Area (RAA), a summary of the PCB and Appendix IX+3 evaluation procedures and results, design information, an implementation plan, a discussion regarding Remediation Contractor selection, details regarding post-construction activities, and the anticipated schedule of construction activities. The Final RD/RA Work Plan was prepared and submitted in accordance with the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW) (Appendix E to the CD).

By letter dated August 20, 2008, EPA conditionally approved the Final RD/RA Work Plan and required submittal of an Addendum to the Final RD/RA Work Plan within 30 days of the date of that letter (i.e., by September 19, 2008). In response to the conditions set forth in that letter, this *Addendum to Final RD/RA Work Plan* (Addendum) summarizes and addresses each of EPA's approval conditions and presents certain modifications to the Final RD/RA Work Plan. The soil-related Response Actions at Hill 78 Area-Remainder will be conducted in accordance with the Final RD/RA Work Plan, as modified by this Addendum.

**EPA CONDITION 1:** *Section 5.2.2 of the Work Plan, Utility-Related PCB Information, indicates that GE performed an evaluation of the corridor associated with the re-routed storm and sanitary sewer lines and that the new pipeline corridor is shown on revised Figure B-33 and the PCB data collected from within the corridor are included on revised Table B-21. The revised Figure B-33 and Table B-21 included in Appendix A of the Work Plan do not include all of the soil sample locations and analytical results for 0 to 15 foot depth intervals within the new pipeline corridor. Specifically, sample location OPCA-SB-20, for which PCB results exist, is not included. GE shall revise Figure B-33 and Table B-21 to include all soil sample locations and analytical results used for evaluating utility corridors for PCBs.*

**GE RESPONSE:** The soil sample location referenced in this condition (OPCA-SB-20) was not included in the in the evaluation of the utility corridor associated with the re-routed storm and sanitary sewer lines because it is not located within that utility corridor. As shown on Figure 4-1 of the Final RD/RA Work Plan, sample location OPCA-SB-20 is located within Tyler Street Extension, just outside the limits of the utility corridor for the re-routed sewer lines. Analytical data from OPCA-SB-20 was utilized in the evaluation of Parcel K11-7-2 (see Table B-2 of the Conceptual Work Plan). No other soil sample locations with analytical results for 0- to 15-foot depth intervals within the utility corridors that were not already presented on Figure B-33 and Table B-21 were identified.

**EPA CONDITION 2:** *Figure B-33 also includes the boundaries of the Hill 78 and Building 71 OPCAs and associated stormwater basins. The OPCA boundaries depicted on Figure B-33 do not coincide with the boundaries depicted in Figure 1 of GE's July 27, 2007, Hill 78 Area-Remainder Third Supplemental Data Letter, Figure 3 of GE's April 13, 2006, Addendum to OPCA Work Plan or with the boundaries depicted in the Fourth Modification of the Consent Decree. GE shall revise Figure B-33 to include the correct OPCA boundaries and determine if any revised boundaries impact the soil evaluations for the RAA.*

**GE RESPONSE:** GE has reviewed the figures listed in this condition and others that have been submitted as part of various Hill 78 Area-Remainder and OPCA documents, including:

- Figure 1-2 of GE's Conceptual Work Plan (submitted February 15, 2008 and conditionally approved by EPA on April 23, 2008).
- Figure 2 of GE's *Supplemental Sampling and Engineering Design Report for Re-Routing of Sanitary and Storm Sewer Pipelines* (2007 Re-routing of Sanitary and Storm Sewer Pipelines, submitted July 3, 2007 and conditionally approved by EPA on September 11, 2007).
- Figure 1 GE's letter re: *Hill 78 On-Plant Consolidation Area Phase III Final Cover Installation Activities* (Phase III Final Cover letter, submitted April 13, 2007 and conditionally approved by EPA on June 19, 2007)
- Figure 1 of GE's letter re: *Hill 78 and Building 71 On-Plant Consolidation Areas 2006 Consolidation and Phase II Final Cover Construction* (Phase II Final Cover Letter, submitted May 5, 2006 and conditionally approved by EPA on August 1, 2006).

Figure B-33 of the Final RD/RA Work Plan showed the same OPCA boundaries that were depicted in the EPA-approved Conceptual Work Plan, which incorporated the March 2006 detailed site survey and certain modifications to the Hill 78-Remainder/OPCA boundary to match the edge of the grading of the OPCAs (following modifications made to the OPCA limits that were discussed with and agreed upon by EPA). However, GE has now made the following changes to Figure B-33, and included a revised Figure B-33 in Attachment A to this document, for the reasons discussed below:

- *Area adjacent to the stormwater basin on the northern side of the Building 71 Consolidation Area.* Final RD/RA Work Plan Figure B-33 and Exhibit 1 of the Fourth Modification of the Consent Decree showed the boundary of the Building 71 OPCA going beyond the edge of the existing fence to the edge of the RAA. A review of the limits of the OPCA in this area shows that the boundary should follow the fence line in this area. The revised Figure B-33 presented herein illustrates the corrected boundary in this area.

- *Areas east and southwest of the stormwater basin on the south side of the Building 71 Consolidation Area.* Figure B-33 was revised to follow the boundary of the OPCA edge of grading and the southern storm water basin in this area, as shown on Figure 1 of the Phase III Final Cover letter.
- *Area to the west of the Hill 78 Consolidation Area.* Figure B-33 was updated to remove the loading dock which was previously shown to the east of the access road, as this structure was removed during the re-routing of the storm and sanitary sewer system pipelines. The OPCA boundary shown on revised Figure B-33 reflects the Final Cover Design as shown on Figure 1 of the Phase III Final Cover letter, and the boundary shown in Figure 2 of the Re-routing of Sanitary and Storm Sewer Pipelines.
- *Area between OPCAs and Pittsfield Generating Company Facility.* The boundary as shown in revised Figure B-33 reflects the proposed Phase II and Phase III Final Cover Boundaries of the OPCA as noted above. In general, along the south side of the OPCAs, the boundary follows the edge of the access road between the Hill 78 and Building 71 OPCAs and the Pittsfield Generating Company facility. That access road, which was not depicted on the figures referenced by EPA, has been added to revised Figure B-33. The OPCA boundary along that road was adjusted to extend to the edge of pavement at certain locations, particularly near corners of the road which were approximated on the prior figures.

GE has reviewed the soil analytical results and evaluations previously presented in the Conceptual and Final RD/RA Work Plans and has determined that these minor boundary modifications do not affect the soil evaluations or proposed Response Actions at this RAA. All soil analytical results near the modified boundaries are below the applicable Performance Standards and no additional soil data are needed to characterize the areas along this boundary. The only soil removal found to be necessary at this RAA was based on PCB results in the top foot in unpaved areas that contain PCB concentrations greater than 125 ppm -- the "not-to-exceed" (NTE) level -- at isolated soil sample locations that are not near the Hill 78 Area-Remainder/OPCA boundary. The soil polygons to be removed do not border the OPCAs, so no modifications to the removal limits are necessary.

**EPA CONDITION 3:** *GE Shall include provisions in the final technical drawings, bid documents and Supplemental Information Package (SIP) for delineating and protecting the previous excavated polygon located adjacent to the realigned storm and sewer pipeline and between the two polygons to be excavated, during the remediation activities described in the Work Plan.*

**GE RESPONSE:** GE will include such provisions in the final technical drawings, bid documents and SIP.

**EPA CONDITION 4:** *GE shall restore the areas impacted by the storm and sanitary sewer pipeline realignment activities prior to, or in conjunction with, the backfilling and restoration activities associated with the remediation described in the Work Plan. GE shall incorporate a restoration plan into the Post-Removal Site Control Plan for the Hill 78 Area-Remainder RAA which illustrates the locations of the new swales and other restoration components for the sewer pipeline realignment area, and documents the inspection activities to be performed.*

*Until restoration is complete, GE shall top soil and seed the area at the southern end of the realigned sewer that has not been addressed since completion of the construction of the sewer, or shall implement interim measures to address erosion occurring at the southern end of the realigned sewer. These measures shall include, but are not limited to, the installation of silt fences and hay bales along the mid-slope of the exposed area, along both sides of the existing drainage swale, and surrounding the edge of the swale at the opening of the storm sewer.*

**GE RESPONSE:** As shown on Drawing Nos. 1 and 2 (provided as Attachment B to this letter), GE is proposing to construct a riprap drainage swale (proposed swale) south of the Hill 78 OPCA. The proposed swale will be located west of an existing riprap drainage swale (existing swale). The existing swale conveys stormwater received from a culvert pipe and from areas adjacent to the swale. The existing swale drains into a riprap outlet located immediately north of Merrill Road. The riprap outlet, which receives stormwater drainage from the existing swale as well as the recently relocated 48-inch storm sewer pipe, discharges to an existing culvert which flows south beneath Merrill Road.

The proposed drainage swale will be constructed to manage stormwater runoff from upgradient areas, including areas that were re-graded during sewer relocation activities. The proposed swale will commence along the toe of the slope south of the Hill 78 OPCA access road and will convey stormwater south to the existing riprap outlet. The proposed swale, which will include a stone check dam, will be configured as shown on Drawing No. 2 (Attachment B).

Interim measures were implemented on September 16 and 17, 2008 to address erosion occurring at the southern end of the realigned sewer lines. Specifically, silt fencing and hay bales were installed mid-slope and along the toe of the south facing slope above the southern sewer realignment fill area. Silt fencing and hay bales were also installed along the westerly edge of the existing riprap swale as well as across the realignment fill area at several locations. Hay bales have also been placed around the opening of the stormwater pipe. Per discussions with EPA personnel, hay bales and silt fencing were not placed on the eastern side of the existing swale.

Attachment C to this letter contains a revised Post-Removal Site Control Plan (modified from the version presented as Attachment E to the Final RD/RA Work Plan), which includes the restoration and inspection activities to be implemented relative to the sewer pipeline realignment area and proposed new drainage swale.

**EPA CONDITION 5:** *In Section 8.6 of the Work Plan, Perimeter Air Monitoring, GE indicates that perimeter PCB air monitoring activities will be conducted on a weekly basis once the perimeter PCB air monitoring currently being performed at the Hill 78 OPCA ceases. To clarify, GE shall conduct perimeter PCB air monitoring activities weekly during the remediation activities described in the Work Plan, regardless of any OPCA placement or PCB air monitoring activities. OPCA-related air monitoring conducted during this time may be utilized to satisfy this requirement, along with the additional air monitoring specified in Condition 6 below.*

**GE RESPONSE:** See response below EPA Condition 6.

**EPA CONDITION 6:** *In addition to the existing air monitoring stations located at the OPCAs and within the Hill 78 Area-Remainder RAA, GE shall also locate one additional air monitoring device between the areas to be excavated and Merrill Road and one between the areas to be excavated and New York Avenue. GE shall conduct PCB air and particulate monitoring at these locations, as well as at least the OPCA West, Northwest, and North PCB air monitoring stations locations, during excavation and restoration activities.*

**GE RESPONSE:** Attachment D to this letter contains revised text for Section 8.6 of the of the Final RD/RA Work Plan, which provides the required clarifications pertaining to the schedule of perimeter air monitoring plan and discusses the additional air monitoring locations to be utilized.

**EPA CONDITION 7:** *GE shall revise Section 1.2 of the Post-Removal Site Control Plan to indicate that the portion of the paved access road along the perimeter of the OPCAs previously identified as being subject to inspection and maintenance, will be inspected as an element of the periodic OPCA-related inspections, in accordance with EPA's October 18, 2007 Conditional Approval of GE's July 27, 2007, Hill 78 Area-Remainder Third Supplemental Data Letter.*

**GE RESPONSE:** This condition was addressed in the *Hill 78 and Building 71 On-Plant Consolidation Areas Post-Removal Site Control Plan* submitted to EPA on August 15, 2008.

### **Schedule of Upcoming Activities**

GE is currently in discussions with potential Remediation Contractors and will select a Remediation Contractor by October 6, 2008, in accordance with the schedule requirement contained in EPA's August 20, 2008 conditional approval letter. Within 30 days after selection of the Remediation Contractor, GE will submit a Supplemental Information Package (SIP), including a schedule for remediation and restoration activities, to EPA for review and approval.

Please call me if you have any questions regarding this plan or other activities at the Hill 78 Area-Remainder Removal Action Area.

Sincerely,



Richard W. Gates  
Remediation Project Manager

### Attachments

cc: Tim Conway, EPA  
Dean Tagliaferro, EPA  
Holly Inglis, EPA  
Rose Howell, EPA\*  
Robert Cianciarulo, EPA  
K.C. Mitkevicius, USACE (CD)  
Linda Palmieri, Weston (2 copies and CD)  
Michael Gorski, MDEP (2 copies)  
Anna Symington, MDEP\*  
Jane Rothchild, MDEP\*  
Nancy E. Harper, MA AG\*

Dale Young, MA EOE\*  
Mayor James Ruberto, City of Pittsfield  
Thomas Hickey, Director, PEDAs  
Jeffrey Bernstein, BCK Law  
Theresa Bowers, Gradient  
Michael Carroll, GE \*  
Rod McLaren, GE\*  
James Nuss, ARCADIS  
James Bieke, Goodwin Procter  
Tim Eglin, Purenergy I, LLC  
Public Information Repositories  
GE Internal Repositories

\* without attachments

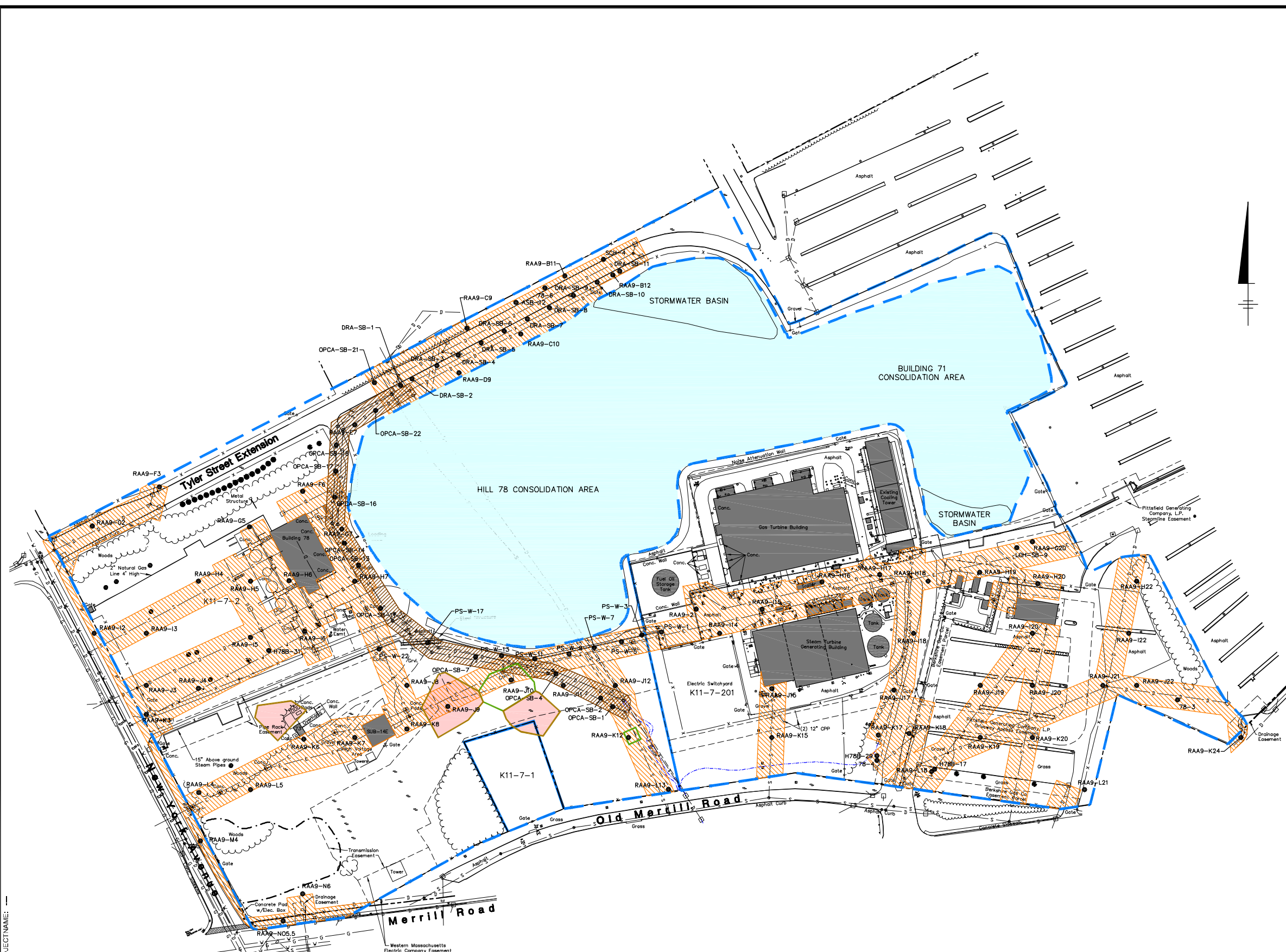
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**Attachments**

**Attachment A**

Revised Figure B-33 of Final  
Removal Design/ Removal Action  
Work Plan for Hill 78 Area-  
Remainder

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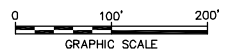


**LEGEND:**

- K11-7-2 PROPERTY ID
- HILL 78 AREA-REMAINDER REMOVAL ACTION AREA BOUNDARY
- AVERAGING AREA BOUNDARY
- HILL 78 AND BUILDING 71 CONSOLIDATION AREAS (NOT PART OF HILL 78 AREA-REMAINDER RAA)
- PROPERTY LINE
- EASEMENT LINE
- FENCE LINE
- EDGE OF SWALE
- EDGE OF WOODS
- LIGHT POLE
- UTILITY POLE
- BUSH/TREE/SHRUB
- GAS MARKER
- MANHOLE
- SANITARY MANHOLE
- CATCH BASIN
- DRAIN MANHOLE
- ELECTRIC MANHOLE
- WATER VALVE
- FIRE HYDRANT
- STORM SEWER (DRAINAGE) LINE
- UNDERGROUND ELECTRIC LINE
- SANITARY LINE
- WATER LINE
- GAS LINE
- ABANDONED STORM SEWER (DRAINAGE) LINE (TAKEN OUT OF SERVICE AND GROUTED)
- ABANDONED SANITARY LINE (TAKEN OUT OF SERVICE AND GROUTED)
- BUILDING/STRUCTURE
- RAA9-J12 EXISTING PCB SOIL BORING LOCATION
- H78SS-1 EXISTING PCB SURFACE SAMPLE LOCATION
- APPROXIMATE LIMITS OF EXCAVATION FOR RE-ROUTING OF STORM AND SANITARY SEWER LINES
- APPROXIMATE LOCATION OF BAND SURROUNDING SUBSURFACE UTILITIES (25 FEET WIDE ON EACH SIDE OF UTILITY)
- AREA OF PREVIOUS 1-FOOT SOIL REMOVAL
- 1-FOOT REMOVAL
- APPROXIMATE AREA OF PREVIOUS FILL MATERIAL PLACEMENT (NOT SINCE 2002/2003)



- NOTES:**
- MAPPING BASED ON ELECTRONIC FILE (S2149W01.DWG) OF SURVEY BY FORESIGHT LAND SERVICES, DATED 3/16/06. UTILITY LOCATIONS BASED ON AVAILABLE RECORD DATA AND VISIBLE FIELD EVIDENCE AND ARE NOT REPRESENTED AS BEING EXACT OR COMPLETE.
  - SAMPLE LOCATIONS ARE APPROXIMATE.
  - THIS FIGURE REPLACES FIGURE B-33 OF GE'S JUNE 20, 2008 FINAL REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR HILL 78 AREA-REMAINDER.



GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
**ADDENDUM TO FINAL RD/RA WORK PLAN FOR  
HILL 78 AREA-REMAINDER**

**UTILITY CORRIDOR  
SOIL SAMPLE LOCATIONS**



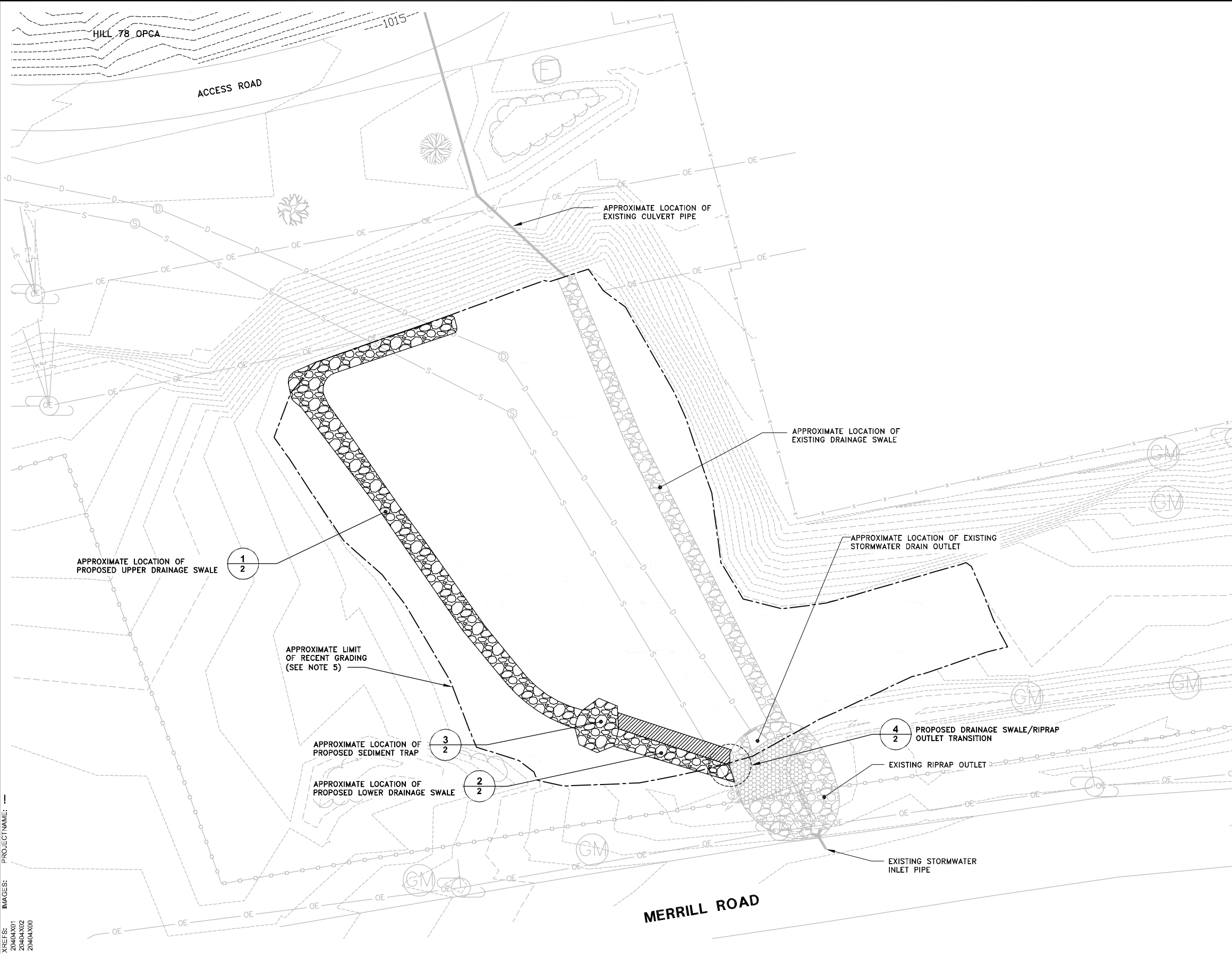


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**Attachment B**

Proposed Drainage Swale Design

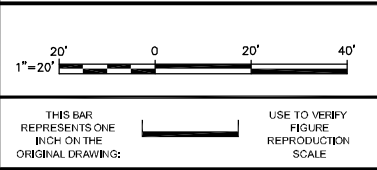
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**LEGEND:**

- D — EXISTING STORMWATER DRAIN PIPE
- ⊙ EXISTING STORMWATER DRAINAGE MANHOLE
- S — EXISTING SANITARY SEWER PIPE
- ⊙ EXISTING SANITARY SEWER MANHOLE
- [Pattern] RIPRAP
- [Pattern] RENO MATTRESS
- [Pattern] EROSION CONTROL MAT

- NOTES:**
1. BASEMAP INFORMATION TAKEN FROM "SANITARY AND STORM SEWER PIPELINE RELOCATION PROJECT - SITE PLAN" PREPARED BY ARCADIS BBL, DATED JULY 2007. ADDITIONAL INFORMATION APPROXIMATED FROM FIELD OBSERVATION.
  2. ELEVATIONS SHOWN ARE REFERENCED TO NATIONAL GEODETIC VERTICAL DATUM (NGVD 1929).
  3. HORIZONTAL DATUM IS REFERENCED TO THE MASSACHUSETTS STATE PLANE COORDINATE SYSTEM (NAD 1927).
  4. CONTOUR INTERVAL EQUALS 1 FOOT.
  5. APPROXIMATE LIMIT OF RECENT GRADING REPRESENTS THE LIMIT OF DISTURBANCE RESULTING FROM SEWER RELOCATION ACTIVITIES.



| No. | Date | Revisions | By | Ckd |
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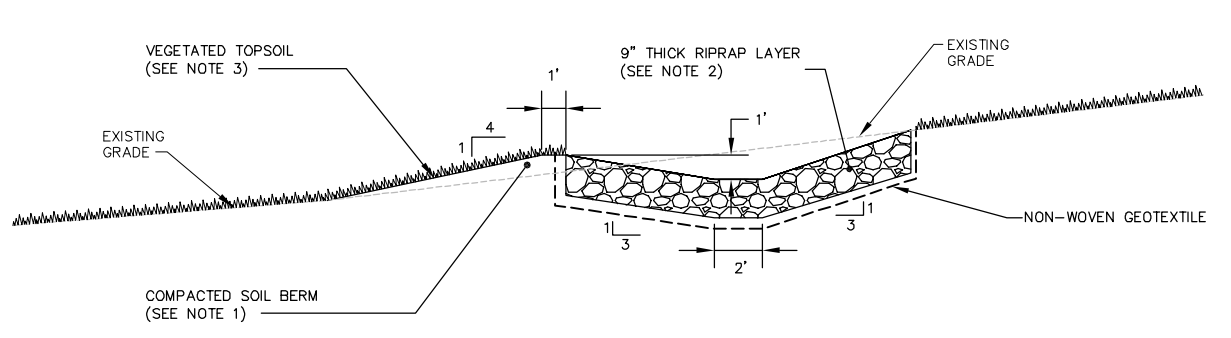
Professional Engineer's Name  
**JAMES M. NUSS**  
Professional Engineer's No.  
38000  
State  
MA  
Date Signed  
Project Mgr.  
PHB  
Designed by  
PHB  
Drawn by  
LAF  
Checked by  
CAA/PHB



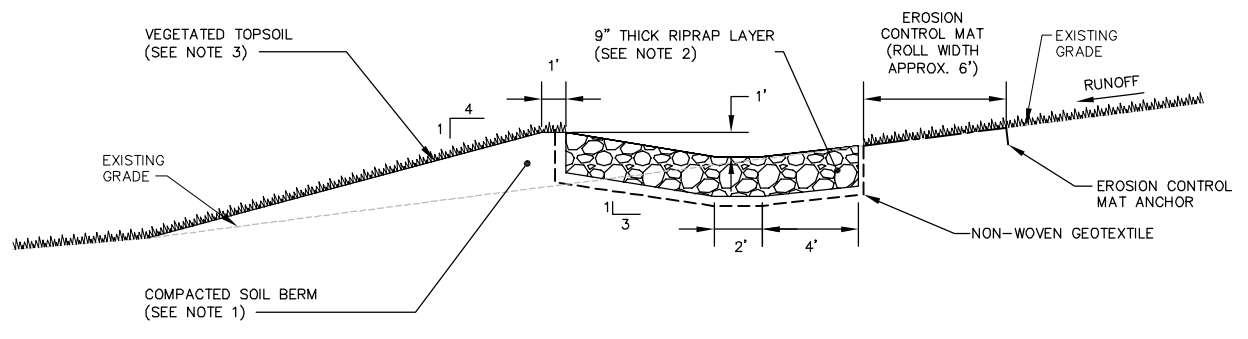
GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS  
HILL 78 - REMAINDER ADDENDUM TO FINAL RD/RA WORK PLAN  
**PROPOSED DRAINAGE SWALE**  
GENERAL

ARCADIS Project No.  
B0020404.2008.00001  
Date  
SEPTEMBER 2008  
ARCADIS  
6723 TOWPATH ROAD  
P.O. BOX 66  
SYRACUSE, NY 13214-0066  
TEL: 315.446.9120

CITY: SYRACUSE DIV/GROUP: 141 DB: DAW/LAF/RGB/KLS LD: DMW PIC: PM: P. BATTEN JM: C. ALBINIO LYR: ON=OFF=REF\*  
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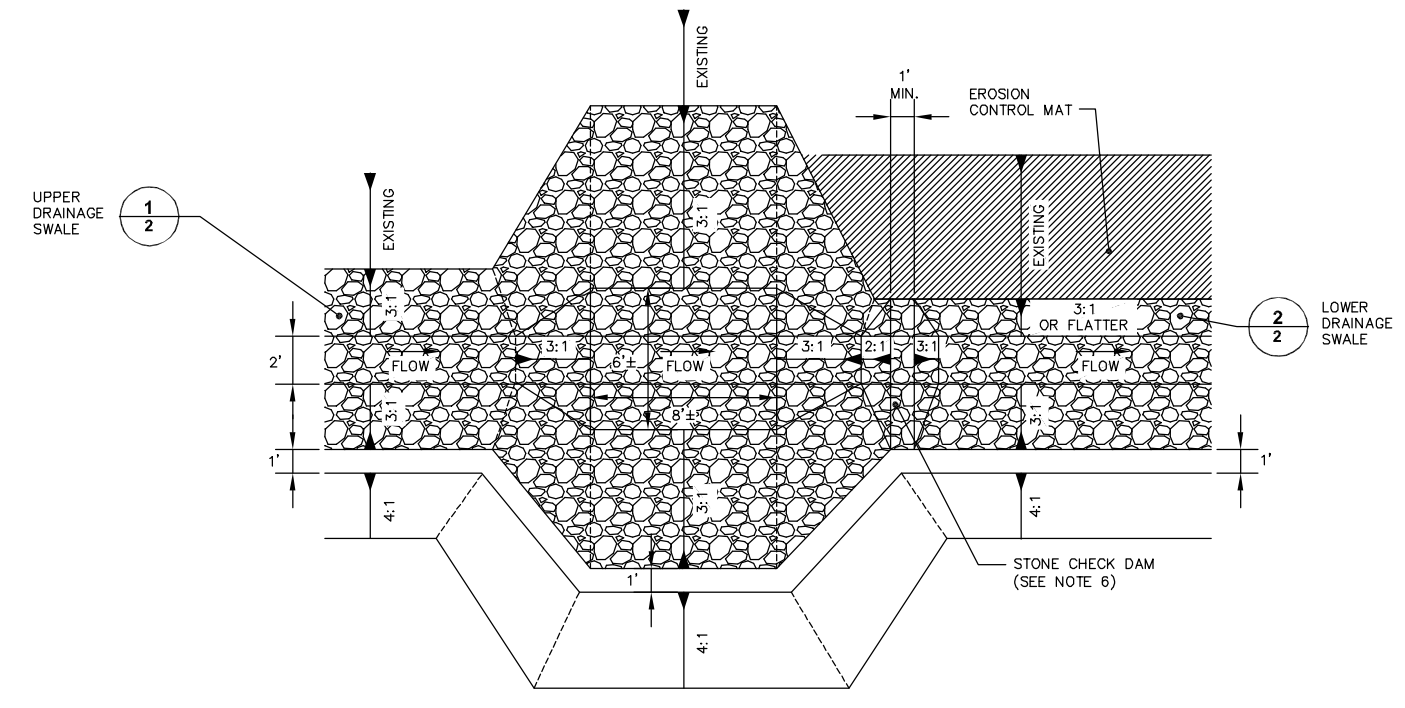


**UPPER DRAINAGE SWALE** ①

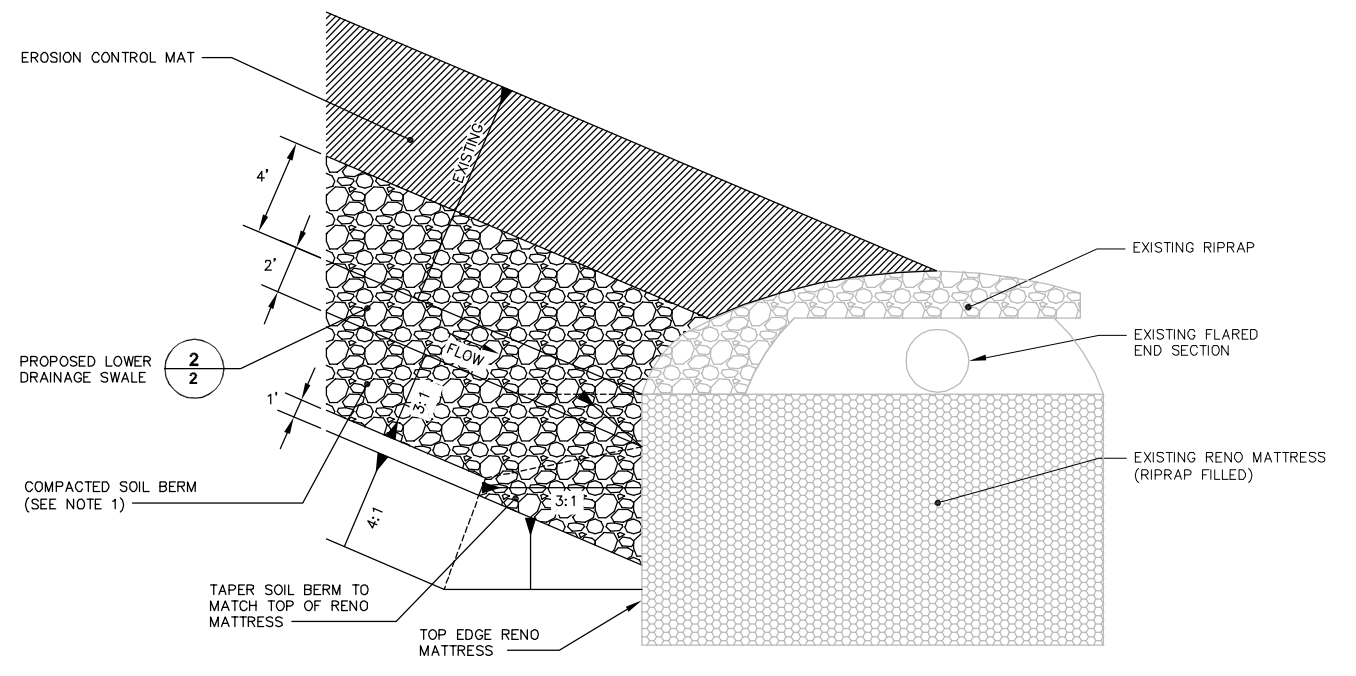


**LOWER DRAINAGE SWALE** ②

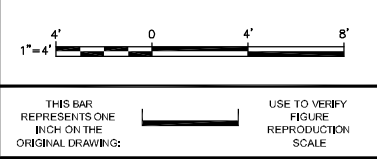
- NOTES:**
1. COMPACTED SOIL BERM SHALL BE COMPOSED OF FINE GRAINED GENERAL FILL OR TOPSOIL. A MINIMUM OF 4 INCHES OF TOPSOIL SHALL BE USED ON THE UPPERMOST SURFACE OF THE BERM. SOIL MATERIAL TO BE COMPACTED USING APPROPRIATELY SIZED TRACKED EQUIPMENT MAKING A SUFFICIENT NUMBER OF PASSES TO ACHIEVE A FIRM, NON-YIELDING STRUCTURE.
  2. RIPRAP SHALL RANGE IN SIZE FROM 4-6 INCHES AND BE COMPOSED OF ANGULAR ROCK FREE OF DELETERIOUS MATERIALS.
  3. TOPSOIL SHALL BE SEEDED WITH SEED TYPE USED FOR RESTORATION OF ADJACENT FILL AREA (I.E., SEWER RELOCATION WORK).
  4. EROSION CONTROL MAT SHALL BE NORTH AMERICAN GREEN P300 OR APPROVED EQUAL. MAT TO BE INSTALLED PER MANUFACTURERS SPECIFICATIONS.
  5. NON-WOVEN GEOTEXTILE SHALL CONSIST OF POLYPROPYLENE MATERIAL WITH A MINIMUM WEIGHT OF 8 OZ./SY.
  6. CHECK DAM CREST TO BE CONSTRUCTED SIX INCHES ABOVE INVERT OF LOWER DRAINAGE SWALE AND HAVE A TOP WIDTH OF ONE FOOT MINIMUM.



**SEDIMENT TRAP** ③



**DRAINAGE SWALE/RIPRAP OUTLET TRANSITION** ④



| No. | Date | Revisions | By | Ckd |
|-----|------|-----------|----|-----|
|     |      |           |    |     |

|  |                 |                       |
|--|-----------------|-----------------------|
| Professional Engineer's Name<br><b>JAMES M. NUSS</b> |                 |                       |
| Professional Engineer's No.<br>38000                 |                 |                       |
| State<br>MA  | Date Signed     | Project Mgr.<br>PHB   |
| Designed by<br>PHB                                   | Drawn by<br>LAF | Checked by<br>CAA/PHB |



GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS  
 HILL 78 - REMAINDER ADDENDUM TO FINAL RD/RA WORK PLAN

**DETAILS**

GENERAL

|   |
|---|
| ARCADIS Project No.<br>B0020404.2008.00001  |
| Date<br>SEPTEMBER 2008  |
| ARCADIS<br>6723 TOWPATH ROAD<br>P.O. BOX 66<br>SYRACUSE, NY 13214-0066<br>TEL: 315.446.9120 |

ARCADIS

**Attachment C**

Revised Post-Removal Site  
Control Plan for Hill 78 Area-  
Remainder

## Post-Removal Site Control Plan

### 1.1 General

This attachment presents GE's Post-Removal Site Control Plan for Hill 78 Area-Remainder. Such activities include periodic inspections and maintenance/repair (if required) of the backfilled, restored, and revegetated areas associated with the Hill 78-Remainder Removal Action. In addition, certain of these activities will also be performed for the restored areas above the storm sewer, drainage swales, and sanitary sewer lines that were recently constructed within Hill 78 Area-Remainder (see Figure C-1).

As indicated in the *Final Removal Design/Removal Action Work Plan for Hill 78 Area-Remainder* (Final RD/RA Work Plan), GE will seed and mulch all areas that are backfilled during remediation, as well as any other disturbed areas, and may perform additional restoration activities at Hill 78 Area-Remainder based on information to be submitted to EPA following the completion of Phase III final cover operations for the Hill 78 OPCA. As illustrated on Figure C-1, the areas above the re-routed storm sewer and sanitary sewer lines were restored by topsoiling, fertilizing, and seeding at areas that were previously unpaved, or asphalt replacement at areas that were previously paved, GE will incorporate any tree restoration and replacement activities as part of the planting of additional trees and shrubs along Tyler Street Extension required in Conditions #1 and #5 of EPA's June 19, 2007 conditional approval letter for GE's April 13, 2007 submittal entitled Hill 78 On-Plant Consolidation Area Phase III Final Cover Installation Activities. In addition, GE is proposing to construct a riprap drainage swale (proposed swale) south of the Hill 78 OPCA to manage stormwater runoff from upgradient areas, including areas that were re-graded during sewer relocation activities. The proposed swale will be located west of an existing riprap drainage swale as shown on Figure C-1 and on Drawing No. 1 in Attachment B of this Addendum to Final RD/RA Work Plan. The proposed drainage swale will be constructed of riprap and will be configured as shown on Drawing No. 2 in Attachment B of this Addendum to Final RD/RA Work Plan.

This Post-Removal Site Control Plan describes the post-construction activities that GE will perform to monitor and maintain the restored areas. This plan has been developed in accordance with Attachment J to the *Statement of Work for Removal Actions Outside the River* (SOW). Following submission and EPA approval of a Final Completion Report for the Hill 78-Remainder Removal Action, this Post-Removal Site Control Plan will be replaced with a Post-Removal Site Control Plan to be set forth in the Final Completion Report.

## 1.2 Periodic Inspections

GE will initiate post-construction inspections of the restored surfaces and new drainage swales associated with the Hill 78-Remainder Removal Action and realignment of storm and sanitary sewers at Hill 78 Area-Remainder following completion of construction activities. Such inspections will be performed for areas that were backfilled, restored, and/or revegetated, and areas in which riprap was installed, and will be conducted in accordance with the requirements set forth below. GE will provide EPA with a minimum 14-day notification prior to conducting any of these inspections.

For backfilled/restored areas (including areas where riprap was placed), the first inspection will be performed approximately one month after completion of construction activities. Thereafter, these areas will be inspected two times per year for the first year after implementation, and annually thereafter (subject to EPA approval of a different frequency). In addition, these areas will be inspected after severe storm events to ensure that they have not sustained significant damage. For this purpose, a severe storm is defined as a storm event in which a 15-minute instantaneous peak of 3,500 cubic feet per second (cfs) or greater is measured on the Housatonic River at the United States Geological Survey (USGS) gauging station at Coltsville, Massachusetts.

At a minimum, these inspections will consist of visual observations focusing on the following: (a) the effectiveness of erosion controls in areas where vegetation is not yet established; (b) any areas where excessive settlement has occurred relative to the surrounding areas; (c) any drainage or growth problems (e.g., debris in riprap); (d) any areas of erosion; and (e) other conditions that could jeopardize the performance of the completed remediation actions (e.g., burrows, vehicle ruts, unauthorized uses of areas, etc.) or drainage swale (e.g., obstructions or dislodged riprap). Inspection is not required of any pavement within Hill 78 Area-Remainder because, as indicated in the Final RD/RA Work Plan, GE has elected to evaluate the entire RAA as unpaved.

In addition, GE will inspect all revegetated areas at Hill 78 Area-Remainder two times per year for a two-year period after the planting of the vegetation to assess the condition of the vegetation, including any evidence of stressed or sparse cover, and to ensure that the vegetation is growing as anticipated and providing the desired degree of erosion control. These inspections will be conducted in May and in August or September of each year during this two-year period.

### 1.3 Maintenance/Repair

GE will conduct maintenance and repair of site conditions and features as necessary to address any such problematic conditions noted during the above-described inspections (or otherwise observed by GE or by EPA or MDEP and communicated to GE). Maintenance/repair activities that may be identified and conducted include, but are not limited to: placement of additional topsoil in areas of erosion or settlement; removal of debris within riprap portions of the proposed drainage swale; repositioning or replacement of dislodged riprap; and repair or replacement of other components of the backfilled/restored areas exhibiting deficiencies or potential problems. If needed, additional planting or seeding will be performed to replace dead, dying, or sparse vegetation.

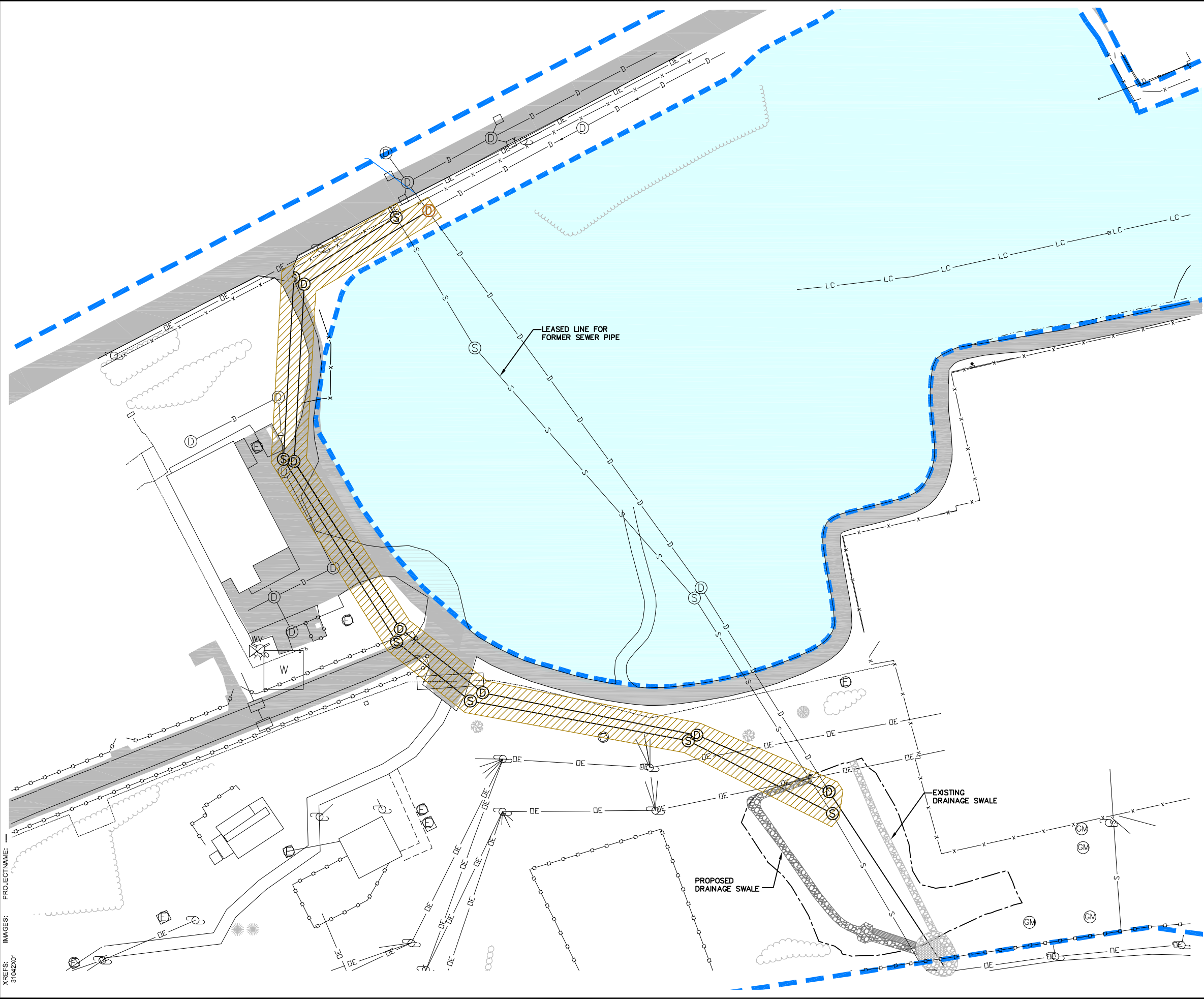
### 1.4 Inspection Reporting

After each inspection, a report will be prepared and submitted to EPA within 30 days of the completion of the inspection. These reports will include the name and contact phone number for the person(s) conducting the inspection and will document the inspection and maintenance activities performed since the submittal of the previous report, as well as future inspection and maintenance activities. 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.

Any deficiencies identified during the inspections will be corrected within 90 days of the inspection date, unless otherwise proposed by GE and approved by EPA.

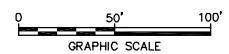
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- LEGEND:**
- K11-7-2 PROPERTY ID
  - APPROXIMATE SITE BOUNDARY
  - HILL 78 AND BUILDING 71 CONSOLIDATION AREAS (NOT PART OF HILL 78 AREA-REMAINDER RAA)
  - PROPERTY LINE
  - EASEMENT LINE
  - FENCE LINE
  - EDGE OF SWALE
  - EDGE OF WOODS
  - \* LIGHT POLE
  - o UTILITY POLE
  - o BUSH/TREE/SHRUB
  - o GAS MARKER
  - o MANHOLE
  - o SANITARY MANHOLE
  - o CATCH BASIN
  - o DRAIN MANHOLE
  - o ELECTRIC MANHOLE
  - o WATER VALVE
  - o FIRE HYDRANT
  - o SANITARY MANHOLE
  - o DRAIN MANHOLE
  - OHW OVERHEAD WIRE
  - D STORM SEWER (DRAINAGE) LINE
  - E UNDERGROUND ELECTRIC LINE
  - S SANITARY LINE
  - W WATER LINE
  - G GAS LINE
  - GE-OWNED PAVED AREA
  - REALIGNED PORTION OF STORM AND SANITARY SEWERS TO BE RESTORED TO CORRESPOND TO SURROUNDING SURFACE CONDITIONS.
  - RIPRAP
  - RENO MATTRESS
  - EROSION CONTROL MAT

**NOTE:**

- MAPPING BASED ON ELECTRONIC FILE (S2149W01.DWG) OF SURVEY BY FORESIGHT LAND SERVICES, DATED 3/16/06. UTILITY LOCATIONS BASED ON AVAILABLE RECORD DATA AND VISIBLE FIELD EVIDENCE AND ARE NOT REPRESENTED AS BEING EXACT OR COMPLETE.



GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
**ADDENDUM TO FINAL RD/RA WORK PLAN FOR  
HILL 78 AREA-REMAINDER**

**SEWER RE-ALIGNMENT  
RESTORATION PLAN**



FIGURE  
**C-1**



ARCADIS

**Attachment D**

Revised Section 8.6 of Final  
Removal Design/ Removal Action  
Work Plan for Hill 78 Area-  
Remainder

## 8.6 Perimeter Air Monitoring

Similar to ongoing final cap placement activities at the OPCAs and recently completed activities associated with the sanitary and storm sewer pipeline re-routing, dust control will be conducted based on visual observations, monitoring performed by the Contractor, and/or the results of particulate monitoring conducted by GE. The presence of visible dust during the performance of construction activities will result in temporary suspension of work activities and the implementation of appropriate dust control measures (e.g., spraying water, hauling materials in properly tarped vehicles, restricting vehicle speeds, covering soil piles with polyethylene sheeting).

Perimeter particulate air monitoring will be conducted daily by GE during project activities that include active construction, materials handling, and off-site material transport. Perimeter PCB air monitoring activities will be conducted by GE on a weekly basis during the remediation activities described in the Work Plan. It is anticipated that three monitoring locations currently used for OPCA operations (i.e., OPCA West, OPCA Northwest, and OPCA North monitoring stations) will also be used to evaluate air quality during the removal activities described herein, along with two additional air monitoring stations (to be placed between the areas to be excavated and Merrill Road and New York Avenue, respectively).

During the time that the Hill 78 Area-Remainder soil remediation activities are being conducted, any available OPCA-related air monitoring data collected from the OPCA West, OPCA Northwest, and OPCA North monitoring stations will be utilized to satisfy that portion of the perimeter air monitoring requirements for the Hill 78 Area-Remainder soil remediation described above as well as the air monitoring requirements pertaining to the OPCA. If OPCA-related air monitoring is not being conducted on at least a weekly basis during the Hill 78 Area-Remainder soil remediation activities, GE will conduct such monitoring on at least a weekly basis using the three OPCA air monitoring stations listed above, along with the additional two air monitoring stations added specifically for the Hill 78 Area-Remainder soil removal activities.