GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

August 15, 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 and Building 71 On-Plant Consolidation Areas (GECD210 and GECD220)
Post-Removal Site Control Plan

Dear Mr. Hull:

Enclosed please find the General Electric Company's (GE's) Post-Removal Site Control (PRSC) Plan for the Building 71 and Hill 78 On-Plant Consolidation Areas (OPCAs) located at GE's Pittsfield facility. This plan, which was developed at this time by request of EPA, has been developed to go into effect following final closure of the OPCAs – i.e., following installation of the final cover at the Hill 78 OPCA. GE currently anticipates that final closure of the Hill 78 OPCA will be completed during the 2009 construction season.

Following such final closure of the Hill 78 OPCA, this PRSC Plan will be updated as necessary to reflect any changes/modifications resulting from construction activities associated with the final cover system at the Hill 78 OPCA or GE's forthcoming Tree Restoration Plan, which EPA directed GE to submit following installation of the final cover. That revised PRSC Plan will also be incorporated into the future final completion report for the OPCAs. In the meantime, GE will continue with the current schedule of semi-annual inspections and maintenance of the closed portions of the OPCAs, as well as with the current schedule of air and groundwater monitoring at and around the OPCAs.

Please feel free to contact me with any questions/comments regarding the enclosed plan.

Sincerely,

Richard W. Gates/GRA

Richard W. Gates
Remediation Project Manager

Enclosure
G:\GE\GE_Pittsfield_CD_OPCAs\Reports and Presentations\Post-Removal Site Control Plan\293811324CvrLtr.doc

cc: Tim Conway, EPA
John Kilborn, EPA
Dean Tagliaferro, EPA
Holly Inglis, EPA
Rose Howell, EPA*
K.C. Mitkevicius, USACE
Linda Palmieri, Weston (2 copies)
Michael Gorski, MDEP (2 copies)
Susan Steenstrup, MDEP
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Nancy E. Harper, MA AG*
Dale Young, MA EOEA*
Mayor James Ruberto, City of Pittsfield
Matt Billetter, City of Pittsfield
Bruce Collingwood, City of Pittsfield
Pittsfield Department of Health*
Thomas Hickey, Director, PEDA
Jeffrey Bernstein, BCK Law
Carl Ameen, Principal, Allendale School
Michael Carroll, GE *
Rod McLaren, GE*
Andrew Silfer, GE*
James Nuss, ARCADIS
James Bieke, Goodwin Procter LLP
Public Information Repositories
GE Internal Repositories

* *without attachments*

Post-Removal Site Control Plan
Hill 78 and Building 71 On-Plant Consolidation Areas

General Electric Company
Pittsfield, Massachusetts

1. Introduction

Section 3.7 of the *Statement of Work for Removal Actions Outside the River* (SOW), which is Appendix E to the Consent Decree (CD) that was entered by the U.S. District Court on October 27, 2000, requires the performance of post-removal site control activities at each Removal Action Area (RAA) at the General Electric (GE) Plant Area following the completion of remediation. Attachment J to the SOW (Future Inspection and Maintenance Activities) describes the specific post-removal site control activities required at these RAAs. Such activities include inspection, maintenance, and repair of landfill caps, other surface covers, and backfilled/restored areas. In accordance with the requirements of Section 3.7 and Attachment J of the SOW, this Post-Removal Site Control (PRSC) Plan describes the inspection, maintenance, monitoring, and repair (if required) that GE will conduct at the Building 71 and Hill 78 On-Plant Consolidation Areas (OPCAs) located at GE's Pittsfield facility (Figure 1) following completion of the Removal Actions at those OPCAs – i.e., following closure of the OPCAs.

The CD contains, as another attachment, a *Detailed Work Plan for the On-Plant Consolidation Areas* (Work Plan), which was submitted by GE in June 1999, approved by the U.S. Environmental Protection Agency (EPA), and subsequently modified by several addenda. That document sets forth plans for the design, construction, operation, closure, and post-closure monitoring of the OPCAs. Section 9 of the Work Plan described the activities that would be conducted as part of future post-removal site control activities at the OPCAs following closure of the OPCAs. As described in Section 9.2, such activities included the semi-annual inspection and maintenance (as necessary) of the final cover system, other components of the OPCAs (i.e., surface water drainage and leachate management systems, etc.), and certain ancillary components. The Work Plan also provided that repair or replacement activities for the final cover system would be performed within appropriate time periods based on the severity of the problem.

In addition, the CD requires the planting of an herbaceous native grassland community on the surface of the final cover of the Hill 78 OPCA as part of the natural resource restoration/enhancement (NRRE) activities. Attachment I to the SOW sets forth the Performance Standards for the NRRE plantings and specifies the future monitoring, inspection, and maintenance activities for those plantings. This PRSC Plan incorporates those requirements as they relate to the herbaceous vegetation on the surface of the Hill 78 OPCA cover.

GE has already implemented the post-closure inspection and maintenance activities described in the Work Plan during a number of post-closure inspections of the portions of the OPCAs that have previously been closed, which include the Building 71 OPCA and a portion of the Hill 78 OPCA. These prior activities are described in Section 2 of this PRSC Plan. Section 3 describes the future post-closure inspection and maintenance activities to be performed at the OPCAs once all portions of the OPCAs have been closed, which will occur upon completion of the final cover at the Hill 78 OPCA. Section 4 describes

the air and groundwater monitoring activities to be conducted for the OPCAs following closure of all portions of the OPCAs. Finally, Section 5 presents the proposed schedule for implementation of these future post-closure activities, and describes the associated reporting requirements.

2. Background – Previous Post-Closure Inspection and Maintenance Activities

GE began post-closure inspection/maintenance activities following installation of the 2.5-acre Phase I final cover for the Building 71 OPCA, which was performed in 2005 and the spring of 2006. The first post-closure inspection was performed on September 8, 2006. The results of that inspection were presented in a letter from GE to EPA dated October 17, 2006. Thereafter, GE conducted semi-annual inspections of the completed portions of the Building 71 and Hill 78 OPCA final covers, as well as the completed portions of the surface water drainage system, leachate management system, and other ancillary components, on June 1 and September 28, 2007, and May 16, 2008. The results of those inspections were presented in letters from GE to EPA dated July 11 and October 29, 2007, and June 12, 2008, respectively. Those letters indicated that some of the inspected items required the performance of certain maintenance activities, including the following (date of inspection noted in parentheses):

- Final Cover System:
  - Erosion and/or areas devoid of vegetation were noted at certain sideslope and plateau locations at the OPCAs (September 2006, June 2007, May 2008).
  - Erosion of the western termination of the northern midslope swale on the Building 71 OPCA was observed (June 2007).
  - Evidence of burrowing animals was noted within the southern Sedimentation Basin (June 2007) and Building 71 OPCA (May 2008).
- Storm Water Drainage System Components:
  - Excessive vegetation growth, sediment accumulation, and/or debris accumulation were observed within perimeter ditches and drainage/culvert pipes (September 2006, June 2007).
  - Excessive vegetation growth, sediment accumulation, and/or debris accumulation were observed in the sedimentation basins, and insufficient stone was observed around outlet structures. Also, the silt screen within the southern sedimentation basin outlet structure was not functioning properly (September 2006).
- Leachate Handling System:
  - The leachate storage tank covers required painting (September 2006, June 2007).
- Ancillary Components:
  - Site Access Road: A pothole, cracks, and spalling were observed on the paved site access road (September 2006, May 2008).
  - Site Security: The permanent fencing at the northwest corner of the Hill 78 OPCA was replaced with temporary fencing during the sanitary/storm sewer rerouting project (May 2008).

- Other:

  - Vegetation: The overall site needed to be mowed and minor seeding was needed in select areas (September 2006).

  - Debris: A dead tree had fallen and certain degraded sedimentation controls (i.e., hay bales) were observed at the Building 71 OPCA (May 2008).

With the exception of painting the leachate storage tank covers, the maintenance activities identified during the September 2006 and June 2007 inspections were performed within weeks of the completed inspections and prior to the next semi-annual inspection. The painting of the leachate storage tank covers was conducted after the June 2007 inspection (when the weather was more amenable to the required painting activities). Regarding the maintenance activities identified during the May 2008 inspection, the pavement cracking and spalling will be reassessed during the Fall 2008 inspection. The remainder of those maintenance activities should be completed prior to the Fall 2008 inspection.

GE will continue to conduct semi-annual inspections, as well as any necessary maintenance activities, for the completed portions of the OPCA final covers and associated components until such time as the final closure of the Hill 78 OPCA has occurred, at which time the post-closure inspection, maintenance, and monitoring requirements set forth in the remainder of this PRSC Plan will apply.

3. Post-Closure Inspection and Maintenance Activities

Consistent with Section 9 of the Work Plan and previous post-closure activities at the OPCAs, following completion of the final closure activities for the Hill 78 OPCA, GE will perform inspection and maintenance (as necessary) of the final cover system, other components of the consolidation areas (i.e., surface water drainage and leachate management systems, etc.), and certain ancillary components on a semi-annual basis in accordance with the requirements of this PRSC Plan (unless and until EPA approves a different frequency). Repair or replacement activities for the final cover system, surface water drainage system, leachate management system, or other ancillary components will be performed within appropriate time periods based on the severity of the problem.

The OPCAs have been divided into the following components that will be subject to the future semi-annual post-closure inspection/maintenance activities described below:

- Final Cover System;
- Surface Water Drainage System;
- Leachate Handling System;
- Perimeter Vegetation; and
- Ancillary Components.

These components are identified on the figure included in Attachment A. Post-closure inspections of these components will include a review of that figure and will utilize the inspection form included as Attachment B. Following final closure of the Hill 78 OPCA, these attachments will be updated as necessary to reflect any changes/modifications resulting from construction activities associated with the final cover system at the Hill 78 OPCA or from other subsequently installed items (e.g., tree plantings).

3.1 Final Cover System

The overall integrity of the final cover systems will continue to be assessed semi-annually during the post-closure period (subject to a reduction in frequency based on discussions between GE and EPA and approval by EPA). Consolidation area covers will be visually inspected for evidence of the following: (a) evidence of topsoil erosion; (b) establishment and coverage of vegetation (e.g., bare or sparsely vegetated areas); (c) continued effectiveness of erosion controls until such time that the restored vegetation is sufficiently established; (d) any areas of uneven settlement relative to the surrounding areas; (e) evidence of damage to the geosynthetic cover components (i.e., geosynthetic drainage composite [GDC], flexible membrane liner [FML], and/or geosynthetic clay layer [GCL]); (f) the overall integrity of the cover system (e.g., evidence of excessive erosion, animal burrows, vehicle ruts, surface water ponding, exposed or damaged geosynthetic cover components, unauthorized excavations); and (h) other conditions that could jeopardize the integrity of the barriers or the performance of the consolidation areas as designed.

These inspections will include inspections of the herbaceous vegetation planted on the surface of the Hill 78 OPCA as part of NRRE activities, to ensure that that vegetation is growing as anticipated and to assess the presence of invasive species. The above-described frequency of inspections of the OPCA covers is anticipated to exceed the frequency required for NRRE plantings by Attachment I to the SOW – i.e., two times per year for the first three years after planting, once during the fifth year after planting, and once during the seventh year after planting. In any event, GE will ensure that, at a minimum, the herbaceous vegetation on the surface of the Hill 78 OPCA cover is performed at the frequency required by Attachment I.

In addition to the cover system components described above, GE will inspect the access roads that were restored with asphalt surfaces for the following conditions: (a) excessive cracking, fissures, spalling, or potholes caused by heaving, uneven settlement, or vehicular use; and (b) evidence of depressions and/or surface water ponding, excessive rutting, or exposed subbase materials. These access roads include the portion of the access road south of the Hill 78 OPCA which EPA specifically required (in its April 23, 2008 conditional approval letter for GE's *Conceptual Removal Design/Removal Action Work Plan for Hill 78-Remainder*), and GE has agreed, to be maintained as paved and to be shown as a paved area in the future Grant of Environmental Restriction and Easement for the Hill 78-Remainder area; this portion of the access road is identified on the figure in Attachment A.

GE will perform repairs and replacement for any of the above-listed cover system components exhibiting deficiencies or potential problems within an appropriate time period based on the severity of the deficiency or problem. Such activities will include the following (as relevant):

- Evidence of damage to geosynthetic cover components will be addressed through the removal and replacement of such components as necessary to restore such components to their intended function.

- Areas of sparse or bare vegetation and/or areas of excessive erosion or ruts/surface water ponding will be repaired by the placement and grading of additional backfill and/or topsoil to re-establish the designed surface elevations.

- Additional seeding, mulching, and placement of erosion controls will be performed as necessary until the vegetative cover is established.

- Shrub and tree growth within the cover system of the OPCAs will be prevented or removed through various means (e.g., periodic mowing, excavation, etc.). Mowing will be conducted once every year and will occur no earlier in the year than August 1.

- For the herbaceous vegetation on the surface of the Hill 78 OPCA cover, 100% coverage of bare ground will be maintained, and growth failure over an area of ¼ acre or more will require replanting of the area, as specified by Attachment I to the SOW. In addition, in that area, as further required by Attachment I, GE will ensure that no greater than 5% of the overall area is covered with invasive species, and will remove any invasive species that exceed that criterion.

- Damage to the access roads will be addressed through the patching of cracks or potholes, or, if necessary, placement of additional subbase materials followed by paving of the substandard areas.

3.2 Surface Water Drainage System

The surface water drainage system will be included as part of the semi-annual inspection/maintenance activities. Components of the surface water drainage system, include:

- Perimeter ditches and swales;
- Drainage swales located along the slopes of the consolidation areas;
- Stormwater/Sedimentation basins; and
- Culverts and drainage pipes.

These components will be inspected to determine whether they are performing as designed or whether erosion and/or blockage is occurring and their performance is being impacted. These inspections will include identification of any evidence of erosion due to sparse vegetation, flow currents, storm-related surges, or obstructions/blockages.

In areas where inspections indicate a decrease in the performance of a particular component due to erosion, steps will be taken to restore the condition by increasing the thickness of the erosion protection layer (e.g., grass, rip rap, etc.) to the original design depth. In areas where inspections indicate a decrease in the performance of a particular component due to a blockage, the item(s) obstructing the flow will be removed.

3.3 Leachate Handling System

Semi-annual inspections and maintenance of the leachate pumping and storage system will also be performed by GE throughout the post-closure period. Inspection activities will consist of inspecting the following system components:

- All mechanical parts (including pumps, float levels, flow meters, etc.); and
- Leachate collection manhole, tanks, and ancillary piping.

Periodic tests will also be performed on the auto-dialer system to verify its performance, and to confirm that the line-of-contact is correct and accurate. Changes to the names and telephone numbers within the auto-dialer system will be made as required. Mechanical repairs and/or replacement to the leachate pumping and storage system components (when necessary) to address any deficiencies noted during the inspection activities will be performed by a qualified contractor under subcontract to GE.

3.4 Perimeter Vegetated Area

The perimeter area that is restored with herbaceous vegetation but is not part of the final cover system for the OPCAs (namely, the area between the OPCAs and Tyler Street Extension, shown in olive green on the drawing in Attachment A) will be inspected semi-annually for a period of two years following completion of the final closure activities for the Hill 78 OPCA. This area will be inspected in May and August or September of each year to ensure that the herbaceous vegetation is growing as anticipated and providing the necessary erosion control. These inspections will also include visual observations of the following: (a) evidence of topsoil erosion; (b) establishment and coverage of vegetation (e.g., bare or sparsely vegetated areas); (c) erosion controls to verify their continued effectiveness until such time vegetation is sufficiently established; and (d) any drainage or growth problems.

In addition, these semi-annual inspections will include observations of other plantings in the perimeter vegetated area, including previously planted trees and the additional trees (if any) planted in accordance with GE's forthcoming Tree Restoration Plan, which will be submitted to EPA after completion of the final cover for the Hill 78 OPCA. Further, GE will continue to inspect any additional trees planted in accordance with the latter plan until they have been inspected twice per year for a period of two years following the completion of the tree planting activities. These inspections will assess whether the plantings are growing as anticipated and providing a visual barrier between the OPCAs and the Allendale School property across the Tyler Street Extension.

GE will conduct maintenance and repair of site conditions and features in the perimeter vegetated area as necessary to address any problematic conditions noted during the above-described inspections. Examples of such 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; additional planting, seeding, and/or fertilization (if necessary) to replace dead, dying, or sparse herbaceous vegetation; removal of all vegetation that appears to be adversely affecting the survival of the vegetation planted (for example, removal of vines growing on and affecting the survival of planted trees); and repair or replacement of any other components of the backfilled/restored areas exhibiting deficiencies or potential problems. In addition, if dead or dying trees in the perimeter vegetated area are observed, GE will evaluate whether the lost trees adversely impact the visual barrier. If it is concluded that the lost trees have such an impact, GE will plant replacement trees of the same or similar species. If tree replacement is required, the monitoring duration of two years will be re-set for the replacement trees.

3.5 Ancillary Components

During each semi-annual inspection, ancillary components of the OPCAs (e.g., fencing, warning signs, etc.) will be inspected to verify that these items are intact and functioning as designed. GE will repair or correct any such components identified as damaged or deficient. If warranted, damaged components may be replaced with new components.

4. Post-Closure Monitoring Activities

In a letter to GE dated May 15, 2008, EPA required that, in addition to the inspection/maintenance activities described in Section 3, this PRSC Plan include a proposal for long-term, post-closure environmental monitoring, including a proposal for air monitoring for polychlorinated biphenyls (PCBs) and groundwater monitoring associated with the OPCAs. Details regarding the proposed post-closure PCB air monitoring and groundwater monitoring activities associated with the OPCAs are provided below.

4.1 Air Monitoring

At the present time, ambient air monitoring activities at and around the OPCAs are performed in accordance with the Work Plan, a *2006 Addendum to the Work Plan* (2006 Addendum), GE's *Ambient Air Monitoring Plan* (AAMP, which is part of GE's *Project Operations Plan*), and Appendix J of GE's *Field Sampling Plan/Quality Assurance Project Plan* (FSP/QAPP). These activities include monitoring for both PCBs and particulate matter at five air monitoring stations located around the perimeter of the OPCAs, as shown on Figure 2. PCB air monitoring at these stations is performed 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). Particulate monitoring is conducted daily on weekdays for approximately 10 hours, from 7:00 am to 5:00 pm, using a real-time particulate monitor. GE will continue these air monitoring activities until completion of the final closure of the Hill 78 OPCA, which will complete the closure of both OPCAs.

Following final closure of both OPCAs, GE will perform PCB air monitoring activities at the five OPCA air monitoring stations two times per year, utilizing the same sampling and analytical procedures used in the current program (as set forth in the 2006 Addendum, the AAMP, and Appendix J to the FSP/QAPP). These monitoring events will be conducted in July and September of each year (unless and until an alternate frequency is approved by EPA). Following construction of the final cover system at the Hill 78 OPCA, particulate air monitoring activities will only be conducted during cover repair/replacement activities that have the potential to generate dust.

During this post-closure monitoring period, the same notification and action levels used in the current program will be used. For PCBs, the notification and action levels consist of a 24-hour average concentration of 0.05 $\mu g/m^3$. For particulate matter, the notification level is a 10-hour average concentration of 120 $\mu g/m^3$ for particulates with a diameter less than 10 micrometers (PM_{10}), and the action level is a 10-hour average PM_{10} concentration of 150 $\mu g/m^3$ (which is the level of the national ambient air quality standard for PM_{10}). In the event of an exceedance of a notification or action level (which is not anticipated), GE will notify EPA as soon as possible following receipt of the data, evaluate the potential cause of the exceedance, discuss with EPA potential response actions, and propose appropriate response actions as warranted.

4.2 Groundwater Monitoring

Section 8 of the June 1999 Work Plan, as modified by the August 12, 1999 *Addendum to Detailed Work Plan for On-Plant Consolidation Areas* (1999 Addendum) described GE's proposed groundwater monitoring program during construction and operation of the OPCAs. The Work Plan also proposed that

upon completion of consolidation activities and closure of the OPCAs, GE would submit a proposal to EPA for a post-closure groundwater monitoring program. As discussed below, GE proposes to continue the current OPCA groundwater monitoring program for a two-year period following the closure of the Hill 78 OPCA, and thereafter to incorporate the OPCA monitoring wells into the groundwater monitoring program that is in effect at that time for the Groundwater Management Area at the GE facility that includes the OPCAs – namely, the Plant Site 3 Groundwater Management Area, also known as GMA 4.

At the present time, as previously proposed by GE and approved by EPA, the groundwater monitoring for the OPCAs has been incorporated into the overall groundwater monitoring program for GMA 4. The current OPCA monitoring program includes twelve wells (78-1, 78-6, GMA4-6, H78B-15, OPCA-MW-1RR, OPCA-MW-2R, OPCA-MW-3, OPCA-MW-4, OPCA-MW-5R, OPCA-MW-6, OPCA-MW-7, and OPCA-MW-8), shown on Figure 3. These wells are sampled on a semi-annual basis for analysis of PCBs, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (PCDDs/PCDFs), sulfide, metals, and physiologically available cyanide (PAC). The PCB, metals, and PAC analyses are conducted on filtered samples only, while the remaining analyses are performed on unfiltered samples. The analytical results from these monitoring events, along with GE's assessments of the results relative to the OPCA and GMA 4 monitoring programs and any recommendations to modify those programs, are compiled into reports for GMA 4 submitted after each semi-annual sampling event. GE will continue this program until final closure of the Hill 78 OPCA.

GE will also continue the current OPCA groundwater monitoring program for a two-year period following the closure of the Hill 78 OPCA. Under this proposal, the OPCA monitoring program evaluations and reporting will continue to be included in semi-annual groundwater quality monitoring reports for GMA 4. After that two-year period, the OPCA monitoring wells will be fully integrated into the GMA 4 groundwater monitoring program that is in effect at that time. Specifically, if all soil-related removal actions have not yet been completed at the non-OPCA RAAs within GMA 4 (i.e., Hill 78 Area-Remainder and a portion of the Unkamet Brook Area), the analytical results from the OPCA monitoring wells will be evaluated against the criteria for inclusion in the GMA 4 interim groundwater monitoring program. Otherwise, the OPCA groundwater monitoring data will be evaluated against the criteria for inclusion in the GMA 4 long-term groundwater monitoring program. Each of these situations is discussed below.

GMA 4 is currently subject to an interim groundwater monitoring program. Such interim programs for the GMAs have been developed under the CD as an extension of the baseline monitoring programs and implemented when the initial two-year baseline monitoring period was concluded prior to completion of the soil-related removal actions at the RAAs within a GMA. They are designed primarily to obtain additional data from wells where it is not yet clear whether they should be included in a long-term monitoring program. To identify this subset of monitoring wells, GE has utilized criteria based on the average constituent concentrations observed in the historical data set at each well. Generally speaking, wells that contained constituent concentrations near the values of the future Performance Standards (i.e., average concentrations ranging from greater than 50% of an applicable MCP Method 1 standard to slightly above the standard) are retained for interim monitoring, while wells with constituent concentrations considerably below the applicable standards or consistently above the standards are generally not included, since those data already indicate whether the wells are appropriate for inclusion in a long-term monitoring program. In addition, selected wells/analyses may be added to the interim monitoring program based on their location in areas of interest (e.g., adjacent to known source areas that

are upgradient from occupied buildings), or if constituent concentrations exhibit an increasing trend during the course of baseline monitoring. In the event that, at the end of the two-year period following closure of the Hill 78 OPCA, the GMA 4 interim groundwater monitoring program is still ongoing, the data from the OPCA monitoring wells will be evaluated based on the above-described criteria for inclusion in that program.

If all soil-related removal actions have been completed at the RAAs located within GMA 4 at the end of that two-year period or at any subsequent time, GE will evaluate the OPCA wells, like all other wells at GMA 4, for inclusion in the long-term monitoring program for GMA 4. For each GMA, the scope of the long-term groundwater monitoring program is set forth in a Baseline Assessment Final Report and Long-Term Monitoring Program Proposal. The information and evaluations required to be included in that document based on existing groundwater data, as well as the parameters required to be specified for the long-term monitoring program, are set forth in Section 6.3.2 of Attachment H to the SOW. GE will provide such information and evaluations for the OPCA monitoring wells, along with a specific proposal regarding which of those wells should be included in the GMA 4 long-term monitoring program. This information and proposal will be submitted to EPA for approval.

Following EPA approval of the GMA 4 Long-Term Monitoring Program Proposal, all further groundwater quality monitoring, reporting, and/or groundwater-related response activities in the vicinity of the OPCAs will be conducted as part of GMA 4.

5. Schedule and Reporting

The post-closure activities described in this PRSC Plan will commence following final closure of the Hill 78 OPCA. GE will perform the OPCA inspection and maintenance activities described in Section 3 on a semi-annual basis (unless and until GE proposes and EPA approves an alternate frequency), with the inspection activities performed in May and August or September of each year. GE will provide EPA with a minimum 14-day notification prior to conducting each of these inspections. In addition to these scheduled inspections, the OPCAs will be inspected following severe storm events to ensure that areas have not sustained significant damage. For this purpose, a severe storm event is defined as a storm event in which a 15-minute instantaneous peak of 3,500 cubic feet per second or greater is measured on the Housatonic River at the United States Geological Survey gauging station at Coltsville, Massachusetts.

Following performance of each inspection at the OPCAs, GE will submit an inspection report within 30 days of that inspection. These reports will include the following information (as relevant):

- Description of the type and frequency of inspection activities conducted;
- Description of any significant modifications to the inspection program made since submittal of the prior inspection report;
- Description of inspection and maintenance activities performed since submittal of the prior report;
- Description of any conditions or problems noted during the inspection which are affecting or may affect the performance of the response actions at the OPCAs;
- Description of any measures taken to correct conditions affecting the performance of the response actions at the OPCAs; and
- Description of any measures that may need to be performed to correct any conditions affecting the performance of the response actions at the OPCAs.

In addition to the above-described information, the semi-annual inspection reports will also include a revised version of the Post-Closure Inspection drawing (Attachment A) (annotated to reflect the inspection findings) and the completed Post-Closure Inspection Form (Attachment B).

With respect to the monitoring described in Section 4, the PCB air monitoring will be conducted twice per year in July and September, and the validated results will be reported to EPA within 60 days from each monitoring event. The groundwater monitoring of the OPCA monitoring wells will be conducted semi-annually (typically during the months of April and October) as part of GMA 4, as described in Section 4.2, and the results will be included in the regular periodic reports on GMA 4.

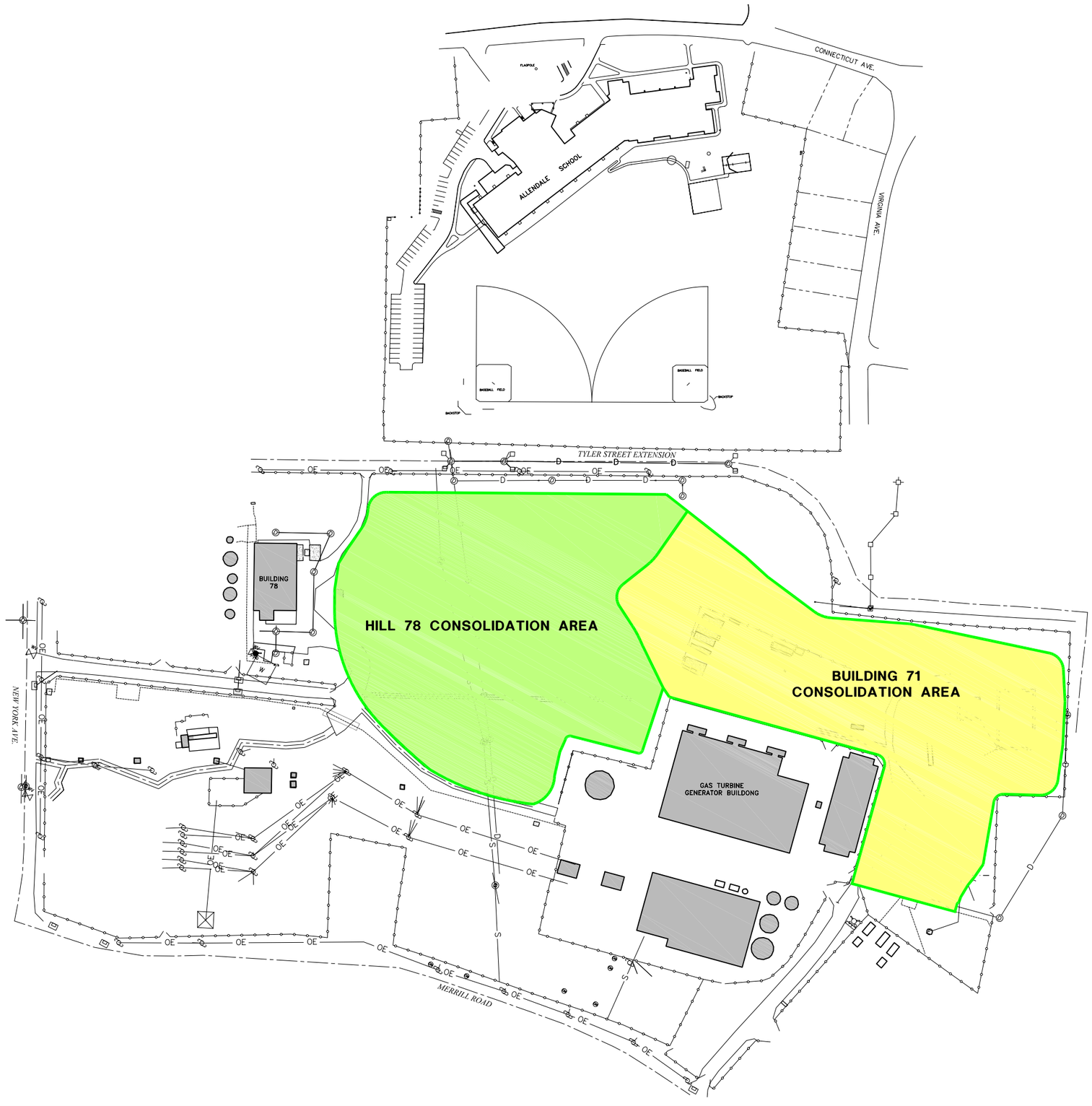
Finally, as required by Section 2.0 of Attachment J of the SOW, the name and contact information for the person who will be responsible for coordinating the performance of the post-removal site control activities at the OPCAs is provided below.

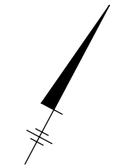
Name	Company/Entity	Telephone Number
Richard W. Gates	General Electric Company	(413) 448-5909

In the event that the individual responsible for coordinating the performance of these activities changes during post-closure period, the contact information for the individual assuming that responsibility will be provided to EPA.

ARCADIS

Figures





LEGEND:

- EXISTING BUILDING OR STRUCTURE
- EXISTING ROADS
- NON–TSCA/NON–RCRA AREA
- TSCA/RCRA AND NON–TSCA/NON–RCRA AREA
- 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.

0 100' 200'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

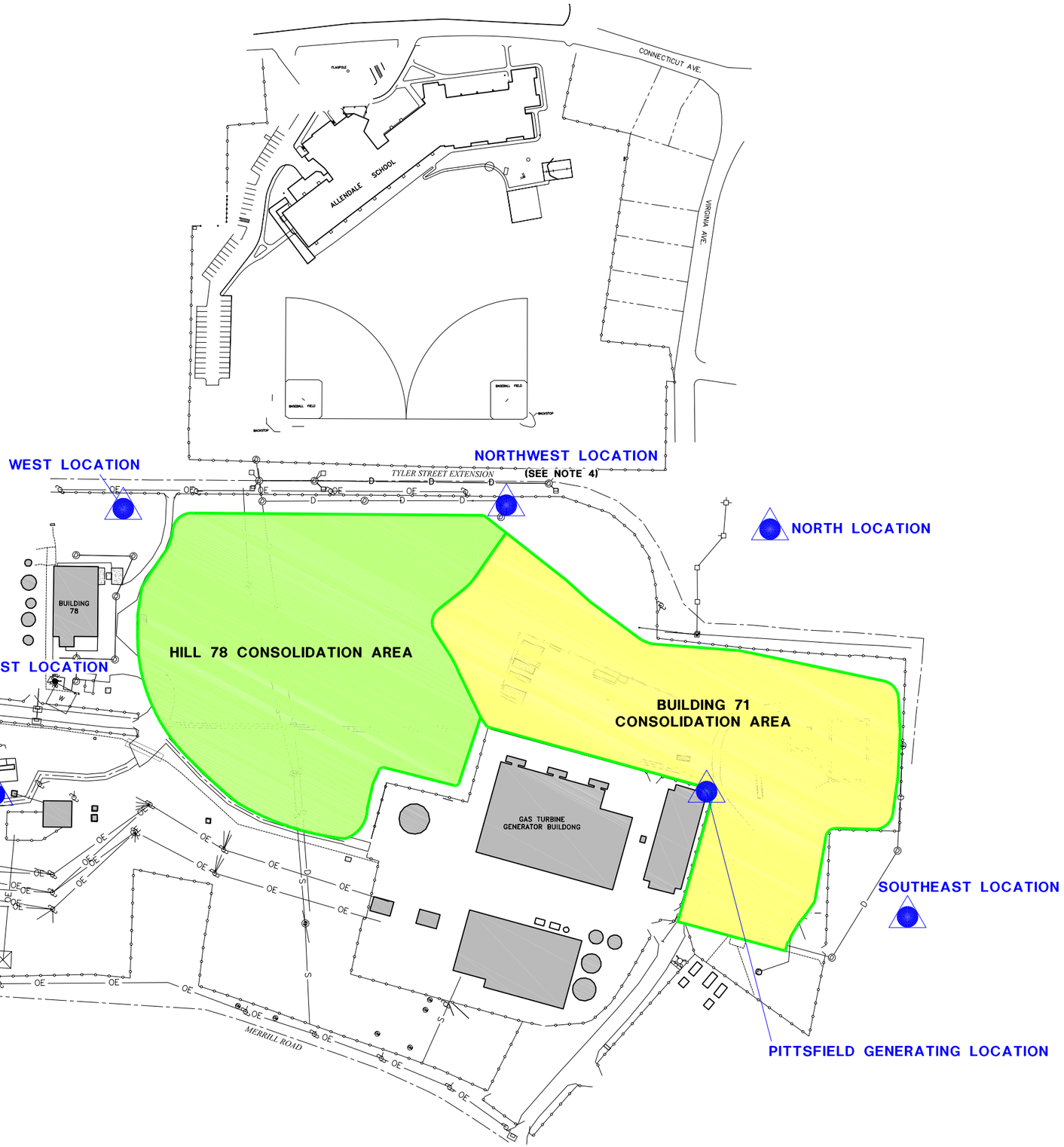
POST-REMOVAL SITE CONTROL PLAN BUILDING 71 AND HILL 78 OPCAs

SITE MAP

ARCADIS

FIGURE 1

CITY: SYR DIV/GROUP: 85 DB: DMW KEW LD: DMW PIC:(Opt) PM:(Reqd) TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
G:\CAD\GE-CAD\C-ACTIB\02040400\000001\DWG\02040G01.DWG LAYOUT: 1 SAVED: 8/13/2008 9:56 AM ACADVER: 17.0S (LMS TECH) PAGESETUP: --- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 8/13/2008 9:57 AM BY: WOOD, KATE
XREFS: 20404X05 IMAGES: PROJECTNAME: ---



LEGEND:

- EXISTING BUILDING OR STRUCTURE
- EXISTING ROADS
- NON–TSCA/NON–RCRA AREA
- TSCA/RCRA AND NON–TSCA/NON–RCRA AREA
- APPROXIMATE LIMIT OF REVISED CONSOLIDATION AREA FOOTPRINT
- EXISTING SECURITY FENCE
- APPROXIMATE LOCATION OF PCB AIR MONITORING STATIONS

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.
4. THE SOUTHWEST PCB AIR MONITORING STATION WAS MOVED TO THE NORTHWEST LOCATION ON NOVEMBER 21, 2005.

0 100' 200'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
POST-REMOVAL SITE CONTROL PLAN
BUILDING 71 AND HILL 78 OPCAs

APPROXIMATE LOCATION OF PCB AIR MONITORING STATIONS

ARCADIS

FIGURE
2

CITY: SYR DIV/GROUP: 85 DB: DMW KEW LD: DMW PIC:(Opt) PM:(Reqd) TM:(Opt) LYR:(Opt)ON=*;OFF=REF*
G:\CAD\GE-CADIC-ACTIB\0204040000000011DWG\20404G02.DWG LAYOUT: 2 SAVED: 8/13/2008 9:57 AM ACADVER: 17.0S (LMS TECH) PAGESETUP: --- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 8/13/2008 9:57 AM BY: WOOD, KATE
XREFS: 20404X05 IMAGES: PROJECTNAME: ---

LEGEND:

- EXISTING BUILDING OR STRUCTURE
- EXISTING ROADS
- NON-TSCA/NON-RCRA AREA
- TSCA/RCRA AND NON-TSCA/NON-RCRA AREA
- APPROXIMATE LIMIT OF REVISED CONSOLIDATION AREA FOOTPRINT
- EXISTING SECURITY FENCE
- 78-1 EXISTING MONITORING WELL
- GW-2 SENTINEL/COMPLIANCE WELL
- GW-3 PERIMETER WELL
- GENERAL/SOURCE AREA SENTINEL WELL (GW-3)
- OPCA GROUNDWATER MONITORING PROGRAM WELL TO BE SAMPLED SEMI-ANNUALLY

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.

0 100' 200'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
POST-REMOVAL SITE CONTROL PLAN
BUILDING 71 AND HILL 78 OPCAs

OPCA MONITORING WELLS

ARCADIS

FIGURE
3

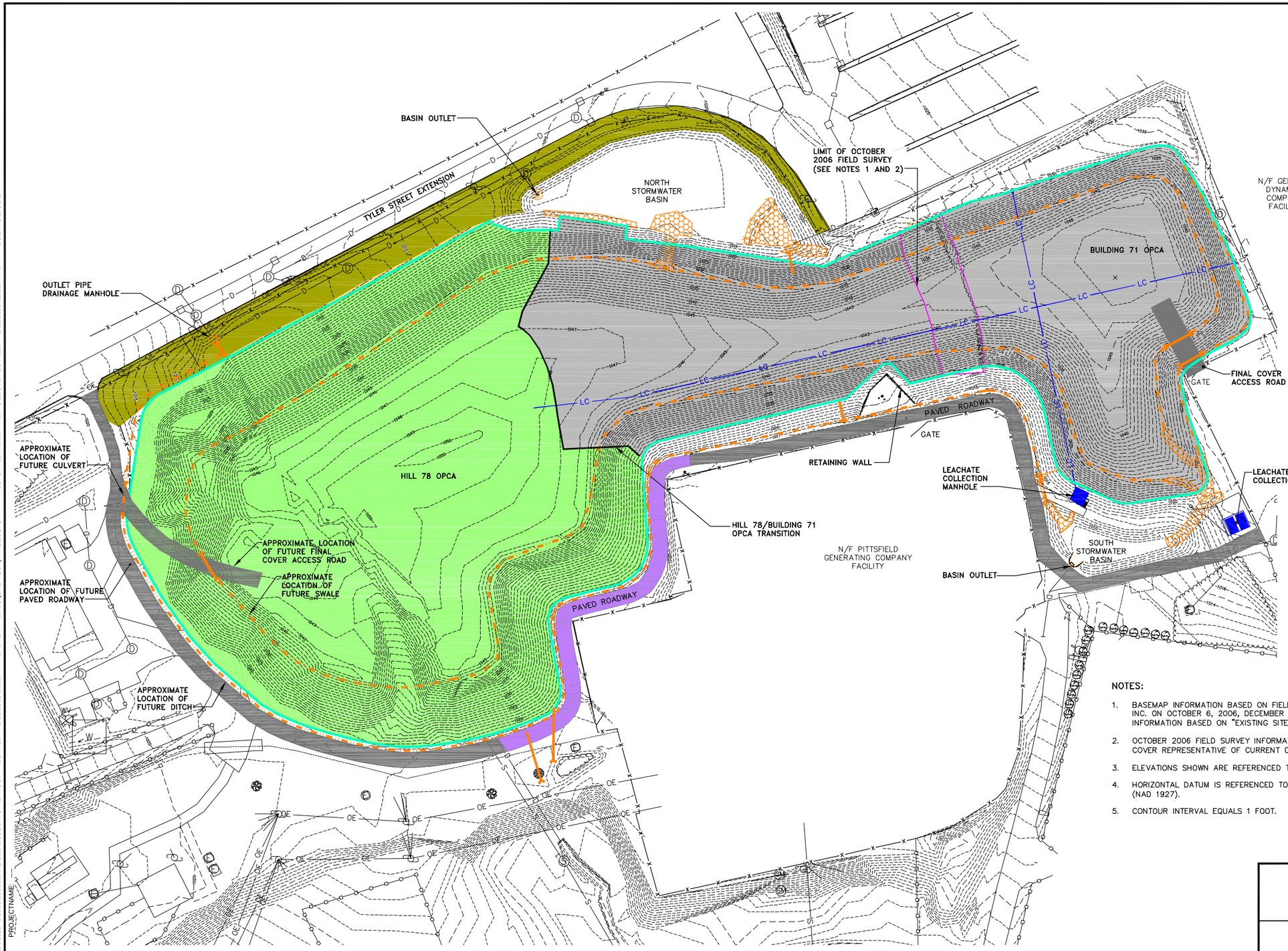
CITY: SYR DIV/GROUP: 85 DB: DMW KEW LD: DMW PIC:(Opt) PM:(Read) TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
G:\CAD\GE-CAD\C-ACT\B002040\0000\0001\DWG\20404G03.DWG LAYOUT: 3 SAVED: 8/13/2008 9:57 AM ACADVER: 17.0S (LMS TECH) PAGESETUP: --- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 8/13/2008 9:58 AM BY: WOOD, KATE
XREFS: IMAGES: PROJECTNAME: ---
20404X05

ARCADIS

Attachments

Attachment A

OPCA Components Subject to Post-Closure Inspection



LEGEND:

- DRAIN MANHOLE
- ACCESS ROAD
- PORTION OF ACCESS ROAD SPECIFICALLY REQUIRED BY EPA TO BE MAINTAINED AS PAVED
- PERIMETER VEGETATED AREA
- NON-TSCA/NON-RCRA AREA
- TSCA/RCRA AREA
- RIPRAP
- CENTERLINE DITCH/SWALE
- CULVERT
- OUTLET PIPE
- LC — LEACHATE COLLECTION FORCEMAIN
- CHAIN LINK FENCE
- LIMIT OF FINAL COVER

NOTES:

1. BASEMAP INFORMATION BASED ON FIELD SURVEY INFORMATION OBTAINED FROM SK DESIGN GROUP, INC. ON OCTOBER 6, 2006, DECEMBER 11, 2006, AND JANUARY 30, 2008. ADDITIONAL BASEMAP INFORMATION BASED ON "EXISTING SITE PLAN" PREPARED BY ARCADIS BBL, DATED APRIL 2007.
2. OCTOBER 2006 FIELD SURVEY INFORMATION REPRESENTS TOP OF WASTE (I.E., NOT TOP OF FINAL COVER REPRESENTATIVE OF CURRENT CONDITIONS).
3. ELEVATIONS SHOWN ARE REFERENCED TO NATIONAL GEODETIC VERTICAL DATUM (NGVD 1929).
4. HORIZONTAL DATUM IS REFERENCED TO THE MASSACHUSETTS STATE PLANE COORDINATE SYSTEM (NAD 1927).
5. CONTOUR INTERVAL EQUALS 1 FOOT.

0 60' 120'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
HILL 78 AND BUILDING 71 OPCAs

OPCA COMPONENTS SUBJECT TO POST-CLOSURE INSPECTION

ARCADIS

CITY: SYR-NY DIV/GROUP-141 DB: LAF KLS KEW LD: DMW PIC:CRA PM: CRA TM:CRA LYR:ON=*;OFF=*REF*
G:\CAD\GE-CADIN-ACTIB\03104200\000\001DWG\31042G01.DWG LAYOUT: 1SAVED: 8/15/2008 11:22 AM ACADVER: 17.0S (LMS TECH) PAGESETUP: ---PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 8/15/2008 11:22 AM BY: POSENAUER, LISA
XREFS: 31042X01 31042X02
IMAGES:
PROJECTNAME:

ARCADIS

Attachment B

Post-Closure Inspection Form

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

POST-CLOSURE INSPECTION FORM

I. Inspection Information

Inspection Date: Weather Conditions:

Inspection Area:

Performed by:

Observed by:

Time Arrived: Time Departed:

Date of Prior Inspection:

II. Observations

		Column A	Column B
A. Site Access Road			
1.	Is there excessive cracking, potholes, visible fissures, or spalling?	No	Yes
2.	Are the subbase materials exposed in an unsatisfactory manner?	No	Yes
B. Final Cover Access Road			
1.	Is there excessive erosion or rutting of road surface?	No	Yes
2.	Is there undesirable vegetative growth?	No	Yes
C. Site Security			
1.	Are the access gates and locks in operating condition?	Yes	No
2.	Is the perimeter fence in satisfactory condition (i.e., in proper position, adequately secured to fence posts, etc.)?	Yes	No
3.	Are the posted signs on the perimeter fence securely attached to fence and visible?	Yes	No
D. Final Cover System			
1.	Are there bare spots (i.e., areas void of vegetation) or exposed geosynthetic cover components?	No	Yes
2.	Is there excessive erosion or stressed vegetation?	No	Yes
3.	Is there evidence of burrowing animals?	No	Yes
4.	Is there evidence of settlement?	No	Yes
5.	Is there evidence of ponding water conditions?	No	Yes
6.	Is there sparse or undesirable vegetative growth?	No	Yes
7.	Are the slopes adequate for surface water drainage?	Yes	No
8.	Is there evidence of excessive wheel rutting?	No	Yes
9.	Are cover system drainage layer outlet pipes visible and free of obstructions?	Yes	No
E. Surface Water Drainage System			
1.	Does established vegetation provide adequate erosion protection?	Yes	No
2.	Are there noticeable obstructions (i.e., sediment accumulation, debris, etc.)?	No	Yes
3.	Are there bare spots (i.e., areas void of vegetation) or excessive erosion on stormwater basin berm slopes?	No	Yes
4.	Are the stormwater basin inlet and outlet features (i.e., riprap forebay and concrete manhole) functioning and free of excessive sediment and debris buildup?	Yes	No
5.	Are the drainage culverts functioning properly (i.e., unobstructed inlet/outlet, pipe ends un-damaged, etc.)?	Yes	No
F. Leachate Handling System			
1.	Are the pumps in operating condition?	Yes	No
2.	Are the leachate storage tanks in satisfactory condition?	Yes	No
3.	Is the leachate collection manhole in satisfactory condition?	Yes	No
4.	Are the usable leachate transfer pipes in satisfactory condition?	Yes	No
5.	Is the auto dialer warning system in operating condition?	Yes	No
6.	Is the flow meter in operating condition?	Yes	No
7.	Are the float levels in operating condition?	Yes	No
G. Perimeter Vegetation			
1.	Does the vegetation provide for adequate erosion protection?	Yes	No
2.	Are there bare spots (i.e., areas void of vegetation) or excessive erosion?	No	Yes
3.	Is there undesirable vegetative growth?	No	Yes
H. Other			
1.	Are there additional conditions that were observed and noted during the inspection?	No	Yes

Notes:

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

POST-CLOSURE INSPECTION FORM

III. Inspection Observations

Describe observations from Column B in Section II. Use additional pages if necessary.

(Locations of the following items are depicted on the Inspection figure.)

IV. Inspection Response Actions

Describe response actions to be conducted for each observation noted in Section III above. Use additional pages if necessary.

V. Prior Inspections

Describe response actions conducted to address prior maintenance needs.

VI. Other Observations