



04-0023

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Corporate Environmental Programs
General Electric Company
100 Woodlawn Avenue, Pittsfield, MA 01201

Transmitted Via Overnight Delivery

March 11, 2004

Mr. Michael J. Nalipinski
EPA Project Manager
U.S. Environmental Protection Agency
EPA New England
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
Silver Lake Area (GECD600)
Proposal for Additional Pre-Design Sampling for Soils Adjacent to Silver Lake**

Dear Mr. Nalipinski:

In January 2003, GE submitted to the U.S. Environmental Protection Agency (EPA) a document titled *Pre-Design Investigation Work Plan for the Silver Lake Area Removal Action* (PDI Work Plan). That document was prepared in accordance with the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site (the Site) and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW). The PDI Work Plan described the pre-design activities proposed by GE to investigate sediments within Silver Lake and bank soils in certain areas adjacent to Silver Lake. The PDI Work Plan was conditionally approved by EPA in a letter dated February 11, 2003.

In October 2003, GE submitted to EPA a document titled *Pre-Design Investigation Work Plan Addendum for Soils Adjacent to Silver Lake* (PDI Work Plan Addendum). The PDI Work Plan Addendum summarized the pre-design soil investigations that have been performed to date for the bank soils and also evaluated and reported on the adequacy of polychlorinated biphenyl (PCB) data (and data from prior soil investigations) to characterize the bank soils at each property (or other relevant areas) within the Silver Lake Area. In addition, the PDI Work Plan Addendum provided an assessment of whether PCBs are or may be present in soils at concentrations greater than 2 parts per million (ppm) in the non-bank portion of each property. Where data needs were identified either to complete the characterization of bank soils or to assess the presence of PCBs in the non-bank portion of a property, the PDI Work Plan Addendum presented a proposal for supplemental pre-design sampling.

Following EPA approval of the PDI Work Plan Addendum, GE completed the supplemental pre-design soil investigations between January 29 and February 20, 2004, with two exceptions. First, at Parcel I9-9-19, the property owner denied GE access for sampling. Therefore, EPA collected samples from this parcel and provided them to GE for analysis. (EPA collected certain samples in addition to those proposed by GE on the understanding that those extra samples were to be held for possible subsequent analysis; those samples are still being held.) Second, GE was not able to collect the samples from Parcel I9-9-24 at the necessary depth increments (11- to 13-feet and 13- to 15-feet) because of the presence of large snow banks at these locations.

GE has reviewed the results of the supplemental sampling and determined that additional samples are necessary to characterize particular properties. Therefore, this letter provides the results of the investigations conducted up to the present time and includes a data table and several figures that summarize the pre-design PCB soil investigations completed to date and proposes limited additional PCB soil sampling and analysis for certain Silver Lake properties.

A. Summary of Pre-Design Soil Data

The analytical results for PCB soil samples collected during the recent pre-design investigations are summarized on Table 1; sample locations are identified on Figures 2-1 through 2-4. At this time, complete analytical laboratory packages have not been received; as a result, the data presented in this letter are preliminary. (A data quality assessment will be performed and the results presented in a forthcoming Interim Pre-Design Investigation Report.) Although the data are preliminary at this time, GE anticipates that all of the data will be usable for future remedial evaluation purposes.

B. Identification of Additional PCB Sampling Activities

As identified on attached Table 2 and Figures 2-2 and 2-4, several properties adjacent to Silver Lake have been identified for additional soil sampling to determine whether and to what extent PCBs may be present at concentrations greater than 2 ppm in the non-bank portions of particular residential and commercial/industrial properties adjacent to the lake. The proposed additional soil sample locations and/or depth increments to be analyzed have been determined utilizing the existing data at and/or adjacent to a particular property. Note that certain samples from additional soil sample locations and/or depth increments will be held and analyzed if PCBs are detected at a relevant depth increment. For each location to be sampled or where samples currently being held may be subjected to analysis (i.e., Parcel I9-9-19), Table 2 identifies the depth increments to be analyzed for PCBs and any depth increments to be collected and held for analysis for PCBs. In total, GE proposes to collect 82 additional pre-design soil samples for PCB analysis from 14 locations within five properties, plus the four samples that GE has not yet been able to collect because of a snow bank at Parcel I9-9-24. In addition, as shown on Table 2, GE proposes to continue to hold samples for possible PCB analysis for thirteen samples previously collected from Parcel I9-9-19. These samples may be analyzed following a review of the PCB results from proposed soil boring I9-9-21-SB-10 located on adjacent Parcel I9-9-21.

C. Future Activities and Schedule

Following EPA approval of the PCB sampling proposed herein, GE will perform the additional pre-design soil investigations. The results of the additional investigations will be incorporated into the Interim PDI Report consistent with the timing previously established in the PDI Work Plan Addendum (i.e., on or before July 14, 2004), subject to obtaining access in a timely manner and potential seasonal constraints on performing the specific investigations. That report will present the results of the supplemental soil investigations proposed herein and summarize the results of all soil investigations completed to date. In addition, it will include an identification of the specific properties for which GE proposes to include the non-bank portions (or parts thereof) in the Silver Lake Area Removal Action under the CD. It will also include an evaluation of the need for additional sampling of the bank and/or non-bank portions of all properties included or proposed for inclusion with the Silver Lake RAA for either PCBs or other Appendix IX+3 constituents and, as warranted, will provide a proposal for such additional sampling.

Please contact me with any questions.

Sincerely,

Richard W. Gates / WBB

Richard W. Gates
Remediation Project Manager

JJL/csc
Enclosure
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cc: Carol Tucker, EPA (cover letter only)
Dean Tagliaferro, EPA
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Anna Symington, MDEP (cover letter only)
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Michael Carroll, GE (cover letter only)
Andrew Silfer, GE
Rod McLaren, GE (cover letter only)
James Nuss, BBL
James Bieke, Shea & Gardner
Property Owner – Parcel I9-9-19
Property Owner – Parcels I9-9-21 & I9-9-22
Property Owner – Parcel I9-9-24
Property Owner – Parcel I9-9-25
Property Owner – Parcel I9-10-8
Property Owner – Parcel I9-10-10
Public Information Repositories
GE Internal Repository

Tables



TABLE 1
SUPPLEMENTAL PRE-DESIGN PCB DATA

PROPOSAL FOR ADDITIONAL PRE-DESIGN SAMPLING FOR SOILS ADJACENT TO SILVER LAKE
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor-1016	Aroclor-1221	Aroclor-1232	Aroclor-1242	Aroclor-1248	Aroclor-1254	Aroclor-1260	Total PCBs
Parcel I9-9-1										
I9-9-1-SB-6	8-10	2/5/2004	ND(0.056)							
Parcel I9-9-9										
I9-9-9-SB-1	11-13	1/30/2004	ND(0.044)							
I9-9-9-SB-4	0-1	1/30/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.15	0.21	0.36
	1-3	1/30/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.088	0.032 J	0.12
	3-5	1/30/2004	ND(0.042)							
	5-7	1/30/2004	ND(0.044)							
	7-9	1/30/2004	ND(0.069)							
	9-11	1/30/2004	ND(0.051)							
I9-9-9-SB-5	0-1	2/3/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.39	0.23	0.62
	1-3	2/3/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.17	0.071	0.241
	3-5	2/3/2004	ND(0.040)							
	5-7	2/3/2004	ND(0.041)							
	7-9	2/3/2004	ND(0.061)							
	9-11	2/3/2004	ND(0.042)							
I9-9-9-SB-6	0-1	2/3/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.24	0.18	0.42
	1-3	2/3/2004	ND(0.041)							
	3-5	2/3/2004	ND(0.044) [ND(0.044)]							
	5-7	2/3/2004	ND(0.048)							
	7-9	2/3/2004	ND(0.046)							
	9-11	2/3/2004	ND(0.042)							
I9-9-9-SB-7	0-1	2/3/2004	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	0.56	0.29	0.85
	1-3	2/3/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.058	0.029 J	0.087
	3-5	2/3/2004	ND(0.045)							
	5-7	2/3/2004	ND(0.048)							
	7-9	2/3/2004	ND(0.042)							
	9-11	2/3/2004	ND(0.041)							
I9-9-9-SB-8	0-1	1/30/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	0.21	0.14	0.35
	1-3	1/30/2004	ND(0.042)							
	3-5	1/30/2004	ND(0.042) [ND(0.045)]							
	5-7	1/30/2004	ND(0.044)							
	7-9	1/30/2004	ND(0.044)							
	9-11	1/30/2004	ND(0.041)							
Parcel I9-9-11										
I9-9-11-SB-7	0-1	2/13/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.056	0.10	0.156
	1-3	2/13/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.10	0.087	0.187
	3-6	2/13/2004	ND(0.20)	ND(0.20)	ND(0.20)	ND(0.20)	ND(0.20)	3.7	2.1	5.8
	6-10	2/13/2004	ND(0.052)							
I9-9-11-SB-8	0-1	2/13/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.56	0.33	0.89
	1-3	2/13/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.90	0.26	1.16
	3-6	2/13/2004	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	0.31	0.064	0.374
	6-10	2/13/2004	ND(0.057)							

TABLE 1
SUPPLEMENTAL PRE-DESIGN PCB DATA

PROPOSAL FOR ADDITIONAL PRE-DESIGN SAMPLING FOR SOILS ADJACENT TO SILVER LAKE
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor-1016	Aroclor-1221	Aroclor-1232	Aroclor-1242	Aroclor-1248	Aroclor-1254	Aroclor-1260	Total PCBs
Parcel I9-9-19										
I9-9-19-SS-1	0-1	2/17/2004	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	0.72	0.50	1.22
I9-9-19-SB-1	0-1	2/17/2004	ND(0.053)	ND(0.053)	ND(0.053)	ND(0.053)	ND(0.053)	0.55	0.37	0.92
	1-3	2/17/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	0.11	0.042 J	0.152
	3-5	2/17/2004	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)
I9-9-19-SB-2	0-1	2/17/2004	ND(0.054)	ND(0.054)	ND(0.054)	ND(0.054)	ND(0.054)	0.53	0.59	1.12
	1-3	2/17/2004	ND(0.053) [ND(0.049)]	0.27 [0.31]	0.13 [0.17]	0.40 [0.48]				
	3-5	2/17/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)
Parcel I9-9-21										
I9-9-21-SB-6	0-1	2/19/2004	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	1.1	0.62	1.72
	1-3	2/19/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.17	0.16	0.33
	3-6	2/19/2004	ND(2.0)	ND(2.0)	ND(2.0)	ND(2.0)	ND(2.0)	16	11	27
	6-10	2/19/2004	ND(2.1)	ND(2.1)	ND(2.1)	ND(2.1)	ND(2.1)	21	7.0	28
	10-15	2/19/2004	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	15	5.5	20.5
I9-9-21-SB-7	0-1	2/19/2004	ND(0.36)	ND(0.36)	ND(0.36)	ND(0.36)	ND(0.36)	5.8	5.3	11.1
	1-3	2/19/2004	ND(3.7)	ND(3.7)	ND(3.7)	ND(3.7)	ND(3.7)	17	40	57
	3-6	2/19/2004	ND(19)	ND(19)	ND(19)	ND(19)	ND(19)	ND(19)	70	70
	6-10	2/19/2004	ND(21)	ND(21)	ND(21)	ND(21)	ND(21)	280	320	600
	10-15	2/19/2004	ND(0.24)	ND(0.24)	ND(0.24)	ND(0.24)	ND(0.24)	ND(0.24)	4.8	4.8
I9-9-21-SB-8	0-1	2/18/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	1.2	0.55	1.75
	1-3	2/18/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.38	0.53	0.91
	3-6	2/18/2004	ND(0.45) [ND(2.3)]	ND(0.45) [ND(2.3)]	4.7 [13]	4.7 [13]				
	6-10	2/18/2004	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	3.6	3.6
	10-15	2/18/2004	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	0.15	0.41
I9-9-21-SB-9	0-1	2/19/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.31	0.22	0.53
	1-3	2/19/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.20	0.075	0.275
	3-6	2/19/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	0.22	0.053	0.273
	6-10	2/19/2004	ND(0.055)	ND(0.055)	ND(0.055)	ND(0.055)	ND(0.055)	ND(0.055)	ND(0.055)	ND(0.055)
	10-15	2/19/2004	ND(0.054)	ND(0.054)	ND(0.054)	ND(0.054)	ND(0.054)	ND(0.054)	0.056	0.056
Parcel I9-9-24										
I9-9-24-SB-3	0-1	2/9/2004	ND(0.052)	ND(0.052)	ND(0.052)	ND(0.052)	ND(0.052)	0.31	0.24	0.55
	1-3	2/9/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	1.2	0.77	1.97
	3-6	2/9/2004	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	0.42	0.14	0.56
	5-7	2/9/2004	ND(0.053)	ND(0.053)	ND(0.053)	ND(0.053)	ND(0.053)	ND(0.053)	ND(0.053)	ND(0.053)
I9-9-24-SB-4	0-1	2/10/2004	ND(0.058)	ND(0.058)	ND(0.058)	ND(0.058)	ND(0.058)	0.27	0.13	0.40
	1-3	2/10/2004	ND(0.052)	ND(0.052)	ND(0.052)	ND(0.052)	ND(0.052)	0.40	0.19	0.59
	3-5	2/10/2004	ND(0.049)	ND(0.049)	ND(0.049)	ND(0.049)	ND(0.049)	ND(0.049)	ND(0.049)	ND(0.049)
I9-9-24-SB-5	0-1	2/10/2004	ND(0.060)	ND(0.060)	ND(0.060)	ND(0.060)	ND(0.060)	0.14	0.085	0.225
	1-3	2/10/2004	ND(0.055)	ND(0.055)	ND(0.055)	ND(0.055)	ND(0.055)	0.32	0.18	0.50
	3-5	2/10/2004	ND(0.046) [ND(0.043)]	0.19 [0.16]	0.086 [0.079]	0.276 [0.239]				
	5-7	2/10/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)
I9-9-24-SB-6	0-1	2/10/2004	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	0.19	0.20	0.39
	1-3	2/10/2004	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	0.58	0.64	1.22

TABLE 1
SUPPLEMENTAL PRE-DESIGN PCB DATA

PRELIMINARY DATA SUBJECT TO VERIFICATION

PROPOSAL FOR ADDITIONAL PRE-DESIGN SAMPLING FOR SOILS ADJACENT TO SILVER LAKE
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
 (Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor-1016	Aroclor-1221	Aroclor-1232	Aroclor-1242	Aroclor-1248	Aroclor-1254	Aroclor-1260	Total PCBs
Parcel I9-9-25										
I9-9-25-SB-8	0-1	2/11/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.70	0.23	0.93
	1-3	2/11/2004	ND(3.6)	ND(3.6)	ND(3.6)	ND(3.6)	ND(3.6)	28	ND(3.6)	28
	3-6	2/11/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	1.2	0.44	1.64
	6-10	2/11/2004	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	0.23	ND(0.047)	0.23
	10-15	2/11/2004	ND(0.060)	ND(0.060)	ND(0.060)	ND(0.060)	ND(0.060)	0.028 J	ND(0.060)	0.028 J
I9-9-25-SB-9	0-1	2/11/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.070	0.066	0.136
	1-3	2/11/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.45	0.23	0.68
	3-6	2/11/2004	ND(0.22)	ND(0.22)	ND(0.22)	ND(0.22)	ND(0.22)	2.1	0.65	2.75
	6-10	2/11/2004	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)
	Parcel I9-9-30									
I9-9-30-SB-8	0-1	2/18/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.31	0.22	0.53
	1-3	2/18/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	1.4	0.97	2.37
	3-6	2/18/2004	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	0.54	0.24	0.78
	6-10	2/18/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)
	Parcel I9-9-32									
I9-9-30-SB-9	0-1	2/18/2004	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.24	0.17	0.41
	1-3	2/18/2004	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	0.73	0.24	0.97
	3-6	2/18/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.60	0.15	0.75
	6-10	2/18/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)
	Parcel I9-9-34									
I9-9-30-SB-10	0-1	2/18/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.35	0.12	0.47
	1-3	2/18/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.23	0.071	0.301
	3-6	2/18/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.11	0.033 J	0.143
	6-10	2/18/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)
	Parcel I9-9-32									
I9-9-34-SB-11	0-1	2/19/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.44	0.29	0.73
	1-3	2/19/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.45	0.16	0.61
	3-6	2/19/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)
	Parcel I9-9-34									
	Parcel I9-9-34									
I9-9-34-SB-10	0-1	2/19/2004	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	1.2	0.68	1.88
	1-3	2/19/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.034 J	0.024 J	0.058 J
	3-6	2/19/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.020 J	ND(0.039)	0.020 J
	Parcel I9-9-34									
	Parcel I9-9-34									
I9-9-34-SB-11	0-1	2/20/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.41	0.41	0.82
	1-3	2/20/2004	ND(0.039) [ND(0.038)]	0.41 [0.38]	0.13 [0.11]	0.54 [0.49]				
	3-6	2/20/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)
	Parcel I9-9-34									
	Parcel I9-9-34									
I9-9-34-SB-12	0-1	2/20/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.041	0.041
	1-3	2/20/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.26	0.12	0.38
	3-6	2/20/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)
	Parcel I9-9-34									
	Parcel I9-9-34									

TABLE 1
SUPPLEMENTAL PRE-DESIGN PCB DATA

PRELIMINARY DATA SUBJECT TO VERIFICATION

PROPOSAL FOR ADDITIONAL PRE-DESIGN SAMPLING FOR SOILS ADJACENT TO SILVER LAKE
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor-1016	Aroclor-1221	Aroclor-1232	Aroclor-1242	Aroclor-1248	Aroclor-1254	Aroclor-1260	Total PCBs
Parcel I9-10-8										
I9-10-8-SB-10	0-1	2/3/2004	ND(0.058)	ND(0.058)	ND(0.058)	ND(0.058)	ND(0.058)	0.30	0.26	0.56
	1-3	2/3/2004	ND(0.041) [ND(0.046)]	0.28 [0.26]	0.12 [0.11]	0.40 [0.37]				
	3-5	2/3/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)		ND(0.039)	ND(0.039)
	5-7	2/3/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)		ND(0.041)	ND(0.041)
	7-9	2/3/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)		ND(0.038)	ND(0.038)
I9-10-8-SB-11	0-1	2/3/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.26	0.32	0.58
	1-3	2/3/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	0.69	0.43	1.12
	3-5	2/3/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.31	0.12	0.43
	5-7	2/3/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)
	7-9	2/3/2004	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)
I9-10-8-SB-12	0-1	2/2/2004	ND(0.049)	ND(0.049)	ND(0.049)	ND(0.049)	ND(0.049)	0.31	0.33	0.64
	1-3	2/2/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.32	0.35	0.67
	3-5	2/2/2004	ND(4.2)	ND(4.2)	ND(4.2)	ND(4.2)	ND(4.2)	14	ND(4.2)	14
	5-7	2/2/2004	ND(4.7)	ND(4.7)	ND(4.7)	ND(4.7)	ND(4.7)	17	16	33
I9-10-8-SB-13	0-1	1/29/2004	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.63	0.49	1.12
	1-3	1/29/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.045	0.048	0.093
	3-5	1/29/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)
I9-10-8-SB-14	0-1	1/29/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.42	0.34	0.76
	1-3	1/29/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
I9-10-8-SB-15	0-1	1/29/2004	ND(0.048)	ND(0.048)	ND(0.048)	ND(0.048)	ND(0.048)	1.3	0.59	1.89
	1-3	1/29/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.66	0.33	0.99
	3-5	1/29/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)

TABLE 1
SUPPLEMENTAL PRE-DESIGN PCB DATA

PROPOSAL FOR ADDITIONAL PRE-DESIGN SAMPLING FOR SOILS ADJACENT TO SILVER LAKE
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Notes:

1. Samples were collected by Blasland, Bouck & Lee, Inc., and were submitted to CT&E Environmental Services, Inc. (CT&E) for analysis of PCBs, except for the samples from Parcel I9-9-19, which were collected by EPA because of the property owner's refusal to grant access to GE. The samples collected by EPA from that parcel were provided to GE either for PCB analysis by CT&E or for holding for possible subsequent PCB analysis.
2. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
3. Duplicate sample results are presented in brackets.

TABLE 2
PROPOSED ADDITIONAL PRE-DESIGN PCB SOIL SAMPLES OR ANALYSES BY DEPTH

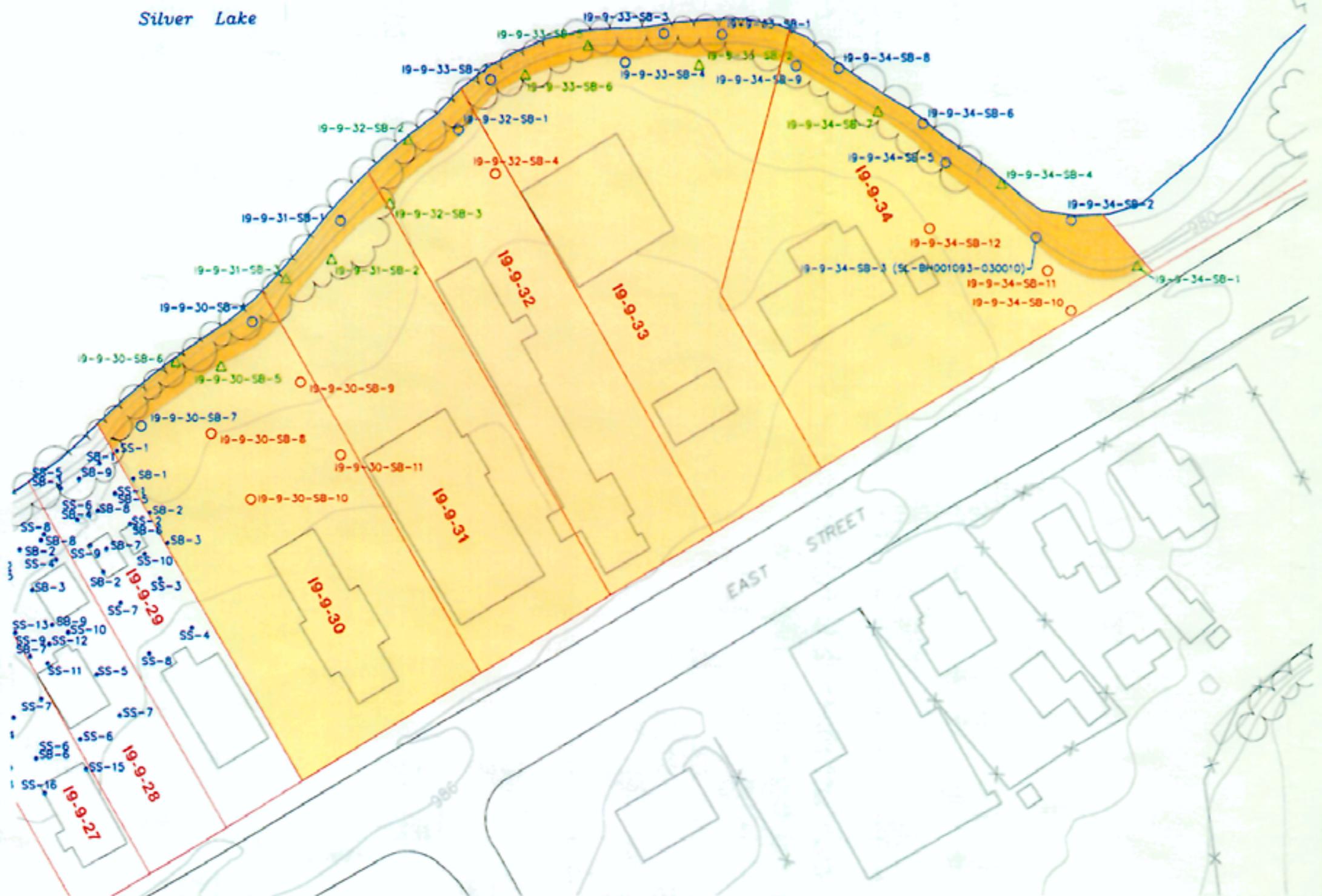
**PROPOSAL FOR ADDITIONAL PRE-DESIGN SAMPLING FOR SOILS ADJACENT TO SILVER LAKE
 GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

SAMPLE ID	DEPTH INCREMENT (FEET)										
	0-1	1-3	3-5	3-6	5-7	7-9	9-11	6-10	11-13	13-15	10-15
Parcel I9-9-19											
I9-9-19-SB-1	---	---	---	---	B	B	B	---	B	B	---
I9-9-19-SB-3	B	B	B	---	B	B	B	---	B	B	---
Parcel I9-9-21											
I9-9-21-SB-10	X	X	---	X	---	---	---	X	---	---	Y
I9-9-21-SB-11	Y	Y	---	Y	---	---	---	Y	---	---	Y
Parcel I9-9-22											
I9-9-22-SB-4	X	X	---	X	---	---	---	X	---	---	X
I9-9-22-SB-5	X	X	---	X	---	---	---	X	---	---	X
I9-9-22-SB-6	Y	Y	---	Y	---	---	---	Y	---	---	Y
I9-9-22-SB-7	Y	Y	---	Y	---	---	---	Y	---	---	Y
Parcel I9-9-24											
I9-9-24-SB-1	---	---	---	---	---	---	---	---	X*	Y*	---
I9-9-24-SB-2	---	---	---	---	---	---	---	---	X*	Y*	---
Parcel I9-9-25											
I9-25-SB-10	X	X	---	X	---	---	---	Y	---	---	Y
Parcel I9-10-8											
I9-10-8-SB-11	---	---	---	---	---	---	Y**	---	Y**	Y**	---
I9-10-8-SB-12	---	---	---	---	---	X	Y	---	Y	Y	---
Parcel I9-10-10											
I9-10-10-SB-1	X	X	X	---	X	Y	Y	---	Y	Y	---
I9-10-10-SB-2	Y	Y	Y	---	Y	Y	Y	---	Y	Y	---
I9-10-10-SB-3	Y	Y	Y	---	Y	Y	Y	---	Y	Y	---
I9-10-10-SB-4	Y	Y	Y	---	Y	Y	Y	---	Y	Y	---
I9-10-10-SB-5	Y	Y	Y	---	Y	Y	Y	---	Y	Y	---

Notes:

1. B - indicates depth interval has been collected and will continue to be held for possible PCB analysis.
2. X - indicates depth interval to be collected and analyzed for PCBs.
3. Y - indicates depth interval to be collected and held for possible PCB analysis.
4. * - indicates samples previously proposed but not yet collected at these intervals due to large snow bank at the sample location. GE proposes to make another attempt to sample these locations at the present time.
5. ** - indicates samples had been previously collected and held from this location at these intervals, but the hold time on these samples has expired and GE is proposing to collect new samples from these intervals.

Figures

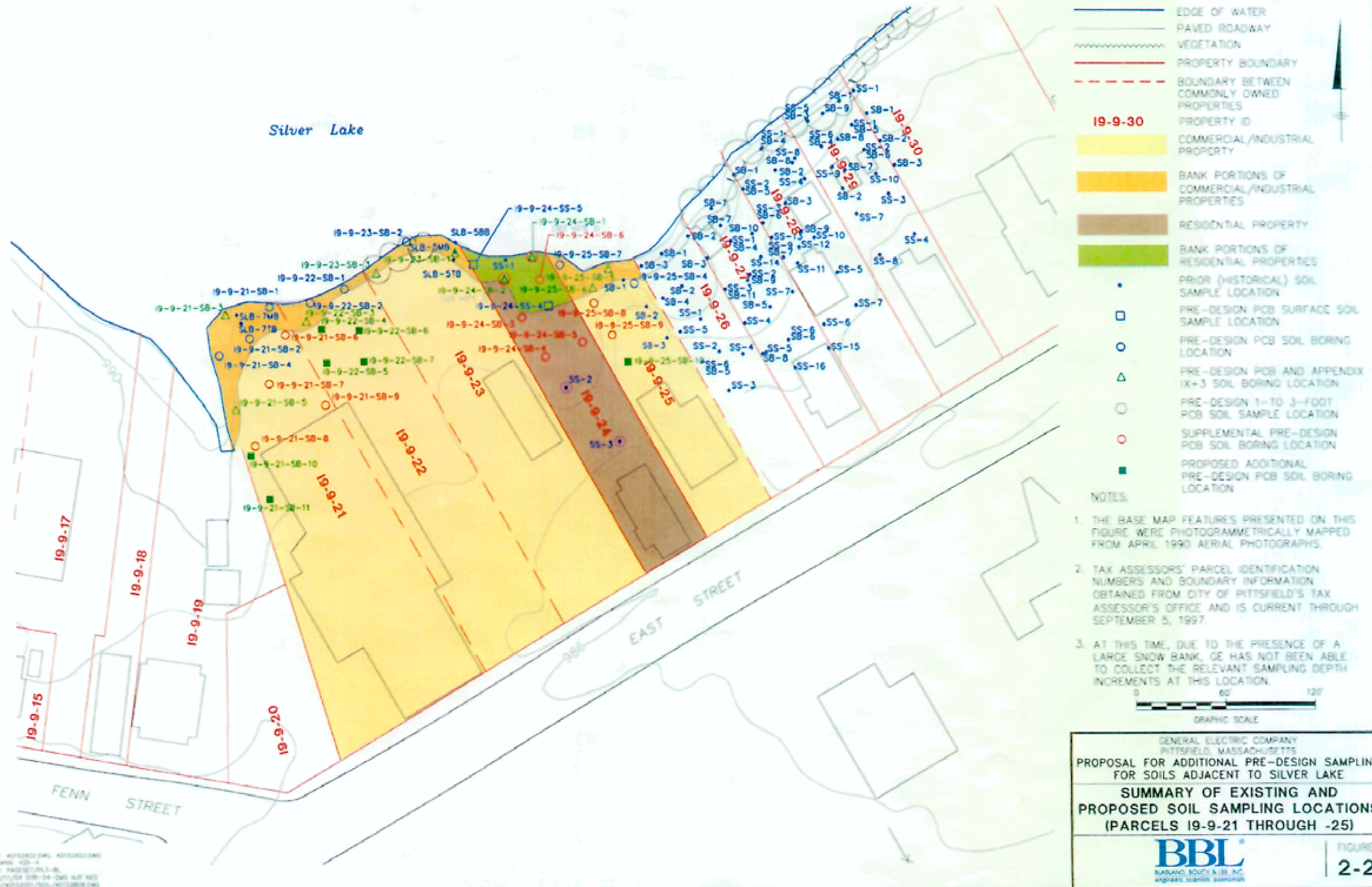


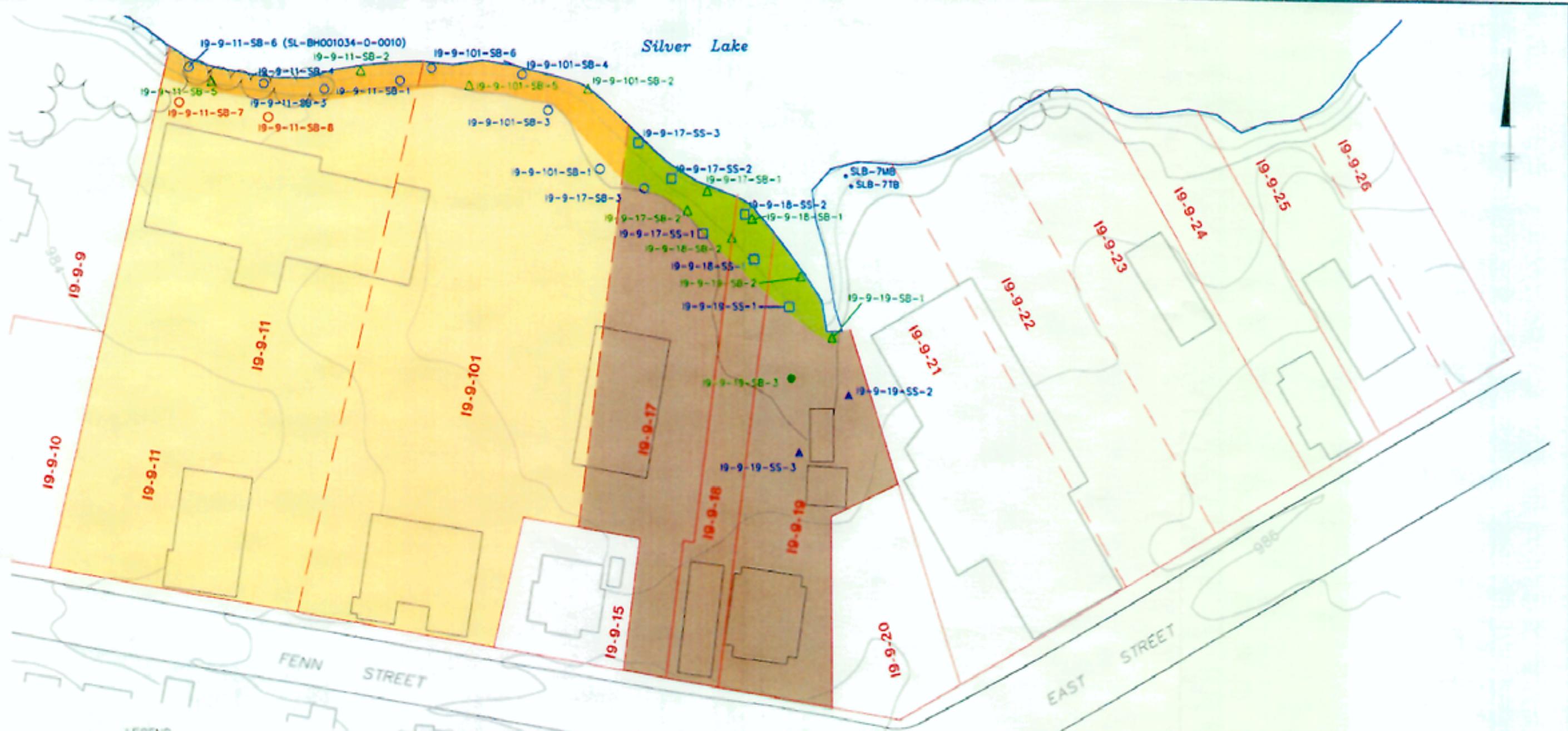
NOTES:

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAFICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
2. TAX ASSESSOR'S PARCEL IDENTIFICATION NUMBERS AND BOUNDARY INFORMATION OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE AND IS CURRENT THROUGH SEPTEMBER 5, 1997.
3. EPA PRE-DESIGN SPLIT SOIL SAMPLE IDENTIFIED IN PARENTHESES.



GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
PROPOSAL FOR ADDITIONAL PRE-DESIGN SAMPLING
FOR SOILS ADJACENT TO SILVER LAKE
**SUMMARY OF EXISTING SOIL
SAMPLING LOCATIONS (PARCELS
19-9-30 THROUGH -34)**





LEGEND

- EDGE OF WATER
----- VEGETATION
— PROPERTY BOUNDARY
- - - - - BOUNDARY BETWEEN
COMMONLY OWNED
PROPERTIES
19-9-30 PROPERTY ID

19-9-30

COMMERCIAL/INDUSTRIAL PROPERTY

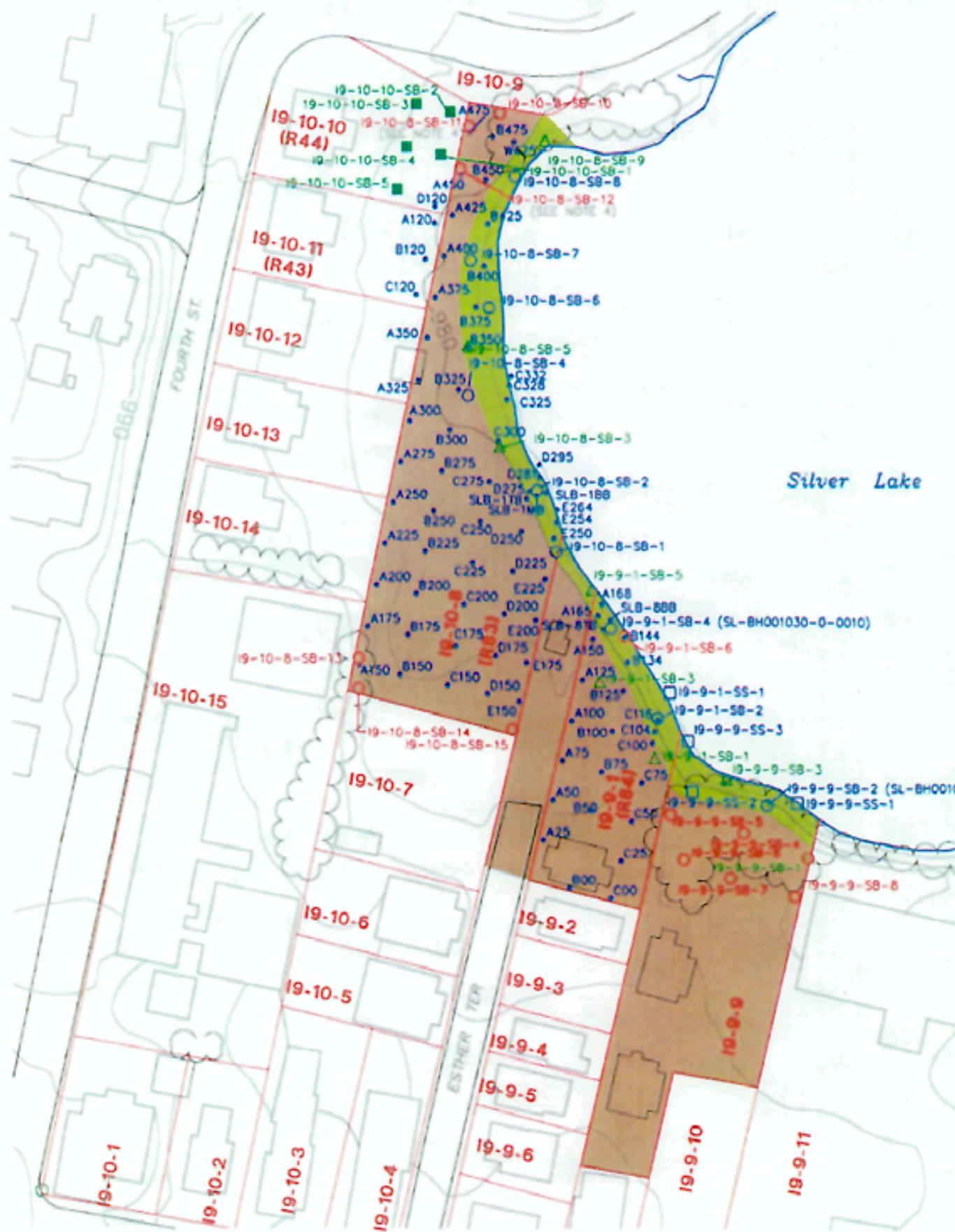
- BANK PORTIONS OF COMMERCIAL/INDUSTRIAL PROPERTIES
 - RESIDENTIAL PROPERTY
 - BANK PORTIONS OF RESIDENTIAL PROPERTIES
 - ▲ EPA PCB SURFACE SAMPLE LOCATION (NOT ANALYZED)

- PRE-DESIGN PCB SURFACE SOIL SAMPLE LOCATION
 - PRE-DESIGN PCB AND APPENDIX IX+3 SOIL SAMPLE LOCATION
 - PRE-DESIGN PCB SOIL BORING LOCATION
 - PRIOR (HISTORICAL) SOIL SAMPLE LOCATION
 - SUPPLEMENTAL PRE-DESIGN PCB SOIL BORING LOCATION
 - EPA PCB SOIL BORING LOCATION (ANALYSIS PENDING)

NOTE

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
 2. TAX ASSESSORS' PARCEL IDENTIFICATION NUMBERS AND BOUNDARY INFORMATION OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE AND IS CURRENT THROUGH SEPTEMBER 5, 1997.
 3. PRE-DESIGN SAMPLES FROM PARCEL 19-9-19 WERE COLLECTED BY EPA REPRESENTATIVES AND PROCESSED BY GE REPRESENTATIVES.
 4. EPA PRE-DESIGN SPUT SOIL SAMPLE IDENTIFIED IN PARENTHESES.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
OR ADDITIONAL PRE-DESIGN SAMPLING
SILLS ADJACENT TO SILVER LAKE
OF EXISTING SOIL SAMPLING
S (PARCELS I9-9-11, -101, -17,
-18, -19)



Silver Lake

LEGEND	
—	EDGE OF WATER
—	PAVED ROADWAY
—	VEGETATION
—	PROPERTY BOUNDARY
- - -	PROPERTY BOUNDARY BETWEEN COMMONLY OWNED PROPERTIES
I9-9-101 (R83)	PROPERTY ID EPA START RESIDENTIAL PROPERTY SAMPLING PROGRAM REFERENCE NUMBER
•	PRIOR (HISTORICAL) SOIL SAMPLE LOCATION
□	PRE-DESIGN PCB SURFACE SOIL SAMPLE LOCATION
△	PRE-DESIGN PCB AND APPENDIX IX+3 SOIL SAMPLE LOCATION
○	PRE-DESIGN PCB SOIL BORING LOCATION
○	SUPPLEMENTAL PRE-DESIGN PCB SOIL BORING LOCATION
■	PROPOSED ADDITIONAL PRE-DESIGN PCB SOIL BORING LOCATION
■	RESIDENTIAL PROPERTY
■	BANK PORTIONS OF RESIDENTIAL PROPERTIES

NOTES:

1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
2. TAX ASSESSORS' PARCEL IDENTIFICATION NUMBERS AND PROPERTY BOUNDARY INFORMATION OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE AND IS CURRENT THROUGH SEPTEMBER 5, 1997.
3. EPA PRE-DESIGN SPLIT SOIL SAMPLE IDENTIFIED IN PARENTHESES.
4. ADDITIONAL PRE-DESIGN PCB SOIL SAMPLING IS BEING PROPOSED AT THIS LOCATION TO DEFINE THE VERTICAL EXTENT OF PCBs.



GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
PROPOSAL FOR ADDITIONAL PRE-DESIGN SAMPLING FOR SOILS ADJACENT TO SILVER LAKE
SUMMARY OF EXISTING AND PROPOSED SOIL SAMPLING LOCATIONS (PARCELS I9-9-1 & -9, I9-10-8)