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Transmitted via Overnight Delivery

March 18, 2005

Mr. James M. DiLorenzo
U.S. Environmental Protection Agency, Region 1
EPA New England (MC HBO)
One Congress Street, Suite 1100
Boston, MA 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
30s Complex (GEC120)
Final Completion Report**

Dear Mr. DiLorenzo:

As you are aware, Paragraph 88.a of the October 2000 Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site requires the General Electric Company (GE) to submit a Final Completion Report following the completion of a Removal Action which satisfies the performance standards provided in the *Statement of Work for Removal Actions Outside the River* (SOW) (Appendix E to the CD). Enclosed is a copy of the *Final Completion Report for 30s Complex Removal Action* which represents the culmination of efforts conducted by GE to investigate and evaluate soils present within the 30s Complex Removal Action Area (RAA). This report demonstrates that the 30s Complex Removal Action has been completed in full satisfaction of the applicable requirements of the CD and that the performance standards for that Removal Action have been achieved.

Please contact me with any questions or comments regarding the enclosed report.

Sincerely,

Andrew T. Silfer, P.E.
GE Project Coordinator

Enclosure

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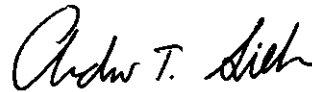
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Statement and Certification by GE's Project Coordinator

I am the General Electric Company's (GE's) Project Coordinator for activities conducted by GE pursuant to the Consent Decree for the GE-Pittsfield/Housatonic River Site, which was entered by the United States District Court for the District of Massachusetts on October 27, 2000.

As described in this *Final Completion Report for the 30s Complex Removal Action*, the 30s Complex Removal Action required by the Consent Decree (excluding Post-Removal Site Control activities) has been completed in full satisfaction of the requirements of the Consent Decree relating to that Removal Action.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



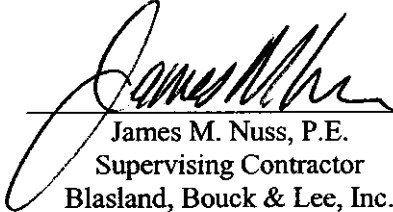
Andrew T. Silfer, P.E.
GE Project Coordinator

Date: March 18, 2005

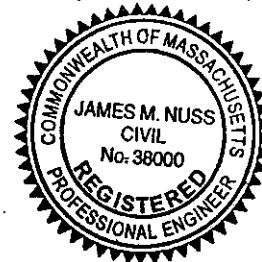
Statement by Supervising Contractor

I am a registered Professional Engineer and represent Blasland, Bouck & Lee, Inc. as the Supervising Contractor for work conducted by the General Electric Company pursuant to the Consent Decree for the GE-Pittsfield/Housatonic River Site, which was entered by the United States District Court for the District of Massachusetts on October 27, 2000.

Based on my inquiry of those individuals responsible for preparing this *Final Completion Report for the 30s Complex Removal Action*, the information contained in this report is, to the best of my knowledge and belief, true, accurate, and complete. As summarized in this report, the 30s Complex Removal Action required by the Consent Decree (excluding Post-Removal Site Control activities) has been completed in full satisfaction of the requirements of the Consent Decree relating to that Removal Action, and the Performance Standards set forth in the Consent Decree for that Removal Action have been attained.


James M. Nuss, P.E.
Supervising Contractor
Blasland, Bouck & Lee, Inc.

Date: March 18, 2005



Professional Engineer Seal
Massachusetts No. 38000

REPORT

***Final Completion Report
for the 30s Complex Removal Action***

**General Electric Company
Pittsfield, Massachusetts**

March 2005

BBL[®]
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

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1. Introduction

This *Final Completion Report for the 30s Complex Removal Action* (Final Completion Report) is submitted by the General Electric Company (GE), pursuant to Paragraph 88.a of the October 2000 Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site, to request the U.S. Environmental Protection Agency (EPA) to issue a Certification of Completion for the 30s Complex Removal Action at this Site. The submittal of this Final Completion Report represents the culmination of efforts conducted by GE to investigate and evaluate soils present within the 30s Complex Removal Action Area (RAA). Figure 1 identifies the 30s Complex RAA and its location within GE's Pittsfield, Massachusetts facility. As discussed in this report, no soil-related remediation actions were necessary to achieve the applicable Performance Standards established in the CD for this RAA. GE is submitting this report for EPA approval and to request a Certification of Completion confirming that GE has satisfactorily completed the 30s Complex Removal Action and that the Performance Standards established in the CD for this Removal Action have been attained.

The activities completed by GE relating to the 30s Complex over the last few years have been consistent with the requirements of the CD and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW) (Appendix E of the CD), and have involved (as appropriate) EPA, the Massachusetts Department of Environmental Protection (MDEP), the Pittsfield Economic Development Authority (PEDA), and the City of Pittsfield. These activities, each of which has been documented in various reports and other submittals to the EPA, have included the following:

- Sampling and analysis of soils throughout the 30s Complex to assess the presence of polychlorinated biphenyls (PCBs) and other hazardous constituents listed in Appendix IX of 40 CFR Part 264, plus three additional constituents – benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine (Appendix IX+3). These activities included sampling conducted by GE prior to the CD, pre-design soil investigations performed in accordance with the CD and SOW, and additional data collected following GE's technical evaluations concerning the need for soil-related response actions.
- Performance of Removal Design/Removal Action (RD/RA) evaluations to determine the need for and scope of response actions necessary to achieve the soil-related Performance Standards established in the CD and SOW for the 30s Complex.

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- Demolition of several existing structures located within the 30s Complex, as part of the Definitive Economic Development Agreement (DEDA) between GE and PEDDA. The actual demolition activities were not subject to the CD and SOW. However, since certain disposition activities occurred within the 30s Complex, the disposition of certain of the demolition debris was subject to the CD and SOW.
 - Establishment of a Grant of Environmental Restriction and Easement (ERE) for the 30s Complex, which establishes allowable and prohibited future uses of and activities on the property, as well as related reporting, protocols, and documentation associated with future site activities. This ERE has been approved by EPA, accepted by MDEP as the Grantee, and recorded in the Berkshire Middle District Registry of Deeds on February 10, 2005, in Book 3156, Page 71, accompanied by a Plan of Restricted Area, which was recorded in the Berkshire Middle District Registry of Deeds on February 10, 2005, in Plat G, No. 347.
 - Performance of a Pre-Certification Inspection of the 30s Complex in accordance with Paragraph 88.a of the CD. The inspection was conducted on February 15, 2005, and was attended by EPA, MDEP, GE, and PEDDA representatives.

As described in Section 3.6 of the SOW, a Final Completion Report is intended to provide a detailed summary of the soil-related response actions that have been performed within the RAA (e.g., soil removal, engineered barrier installation, etc.) to achieve the applicable Performance Standards established in the CD and SOW. Such a document would then serve as the basis for GE's determination that the response actions have been completed in accordance with the applicable requirements of the CD. However, for the 30s Complex, the soil investigations and technical RD/RA evaluations resulted in the determination that current conditions already achieve the applicable Performance Standards, such that no soil remediation actions were necessary. As a result, this Final Completion Report does not provide details concerning completed soil remediation actions, but rather summarizes the investigations and evaluations that have been performed for this RAA.

Based on activities completed to date, including the execution and recording of an ERE, GE has satisfied all applicable soil-related Performance Standards established in the CD and SOW for the 30s Complex Removal Action. As a result, consistent with the requirements of Paragraph 88.a of the CD, GE and its Supervising Contractor (Blasland, Bouck & Lee, Inc.) have prepared statements indicating that the 30s Complex Removal Action has been completed in full satisfaction of the applicable requirements of the CD. These statements are included in this Final Completion Report.

The soil investigations and RD/RA evaluations performed for the 30s Complex have generated an enormous amount of information, summarized in various documents related to the proposed and completed soil investigations and the results of technical RD/RA evaluations. In addition, EPA has provided approval or conditional approval of each such GE submittal. Collectively, this information serves as the basis for GE's conclusion that the applicable soil-related Performance Standards for the 30s Complex Removal Action have been achieved. It is not possible to include all of the available information within this Final Completion Report, nor is that the objective of this report, as discussed above. As a result, this Final Completion Report provides a general overview of the investigations and evaluations that GE has performed for this RAA, with references to more detailed reports and other correspondence.

Included in this report are summaries of pre-design and other soil investigations (Section 2), RD/RA evaluations for PCBs and other Appendix IX+3 constituents in soil (Section 3), the building demolition activities performed by GE in this area (Section 4), and activities performed since completion of the RD/RA evaluations (Section 5). Finally, this Final Completion Report includes comparison of current site conditions to the applicable soil-related Performance Standards for the 30s Complex (Section 6) and a discussion of anticipated future inspection and maintenance activities for the 30s Complex (Section 7). A Post-Removal Site Control Plan for the 30s Complex is provided in Attachment A. Attachment B contains photographs that depict site conditions prior to the building demolition activities and the condition of this RAA at the time of the Pre-Certification Inspection that was conducted on February 15, 2005. Attachment C contains a topographic survey map representing site conditions as of September 2004 and the Plan of Restricted Area map for the 30s Complex.

2. Summary of Completed Soil Investigations

Over the last few years, GE has performed a number of sampling and analysis activities within the 30s Complex. These activities have been conducted either: (1) as part of pre-design soil investigations required pursuant to the CD and Attachment D of the SOW, (2) in conjunction with building demolition activities, or (3) as part of other activities related to the future transfer of the 30s Complex to PEDDA. The data generated by these activities (as well as certain sampling data obtained from investigations conducted by GE dating back to 1991) have been used to characterize existing conditions with respect to PCBs and other Appendix IX+3 constituents and to support the performance of technical RD/RA evaluations to assess the need for soil-related remediation to achieve the applicable Performance Standards. In all cases, the proposed scope of each sampling activity was presented to EPA for approval, EPA approval was received, and the sampling results were documented in a subsequent submittal to EPA. In addition, all of the sampling data have been subject to a data quality review and assessment pursuant to the EPA-approved *Field Sampling Plan/Quality Assurance Project Plan* (FSP/QAPP), prepared by Blasland, Bouck & Lee, Inc. (BBL), which was in effect at the time of the review. (The FSP/QAPP was initially submitted in September 2000 and approved by EPA by letter of October 17, 2000, and was subsequently updated in January 2002 and June 2004.) Only data of acceptable quality were included in subsequent RD/RA evaluations.

In December 2001, GE submitted a *Conceptual Removal Design/Removal Action Work Plan for the 20s, 30s, 40s Complexes* (Conceptual RD/RA Work Plan), prepared by BBL, which presented all then-available soil data from the 30s Complex that were considered usable for RD/RA evaluations. Subsequently, as discussed further below, GE collected additional soil data and revised its RD/RA evaluations based on those data. As a result, GE submitted to EPA and MDEP a report entitled *Soil Data Compilation Report for 30s Complex* (Data Compilation Report), also prepared by BBL and dated November 2, 2004, which summarizes all usable sampling data from this RAA. This Data Compilation Report was approved by EPA in a letter dated January 18, 2005.

Soil investigations at the 30s Complex can generally be categorized into three time periods: (1) those activities conducted prior to the CD, (2) pre-design soil investigations required as part of the CD and SOW, and (3) various soil investigations conducted following GE's initial RD/RA evaluations. Of these, the majority of the soil data was obtained as part of the formal pre-design investigations conducted by GE in accordance with the SOW and CD. Additional discussion of the various soil investigations is presented below.

In certain instances (i.e., where historical sampling data were determined to be usable based on sampling location and depth and a review of the analytical data quality), soil data obtained by GE in the 1990s were included in the available data set and used to satisfy some of the pre-design soil investigation requirements. Such data were presented in the following reports:

- *MCP Interim Phase II Report and Current Assessment Summary for East Street Area 2/USEPA Area 4*, BBL, August 1994.
- *MCP Supplemental Phase II Scope of Work and Proposal for RCRA Facility Investigation of East Street Area 2/USEPA Area 4*, BBL, July 1995.
- *Addendum to MCP Supplemental Phase II Scope of Work and Proposal for RCRA Facility Investigation of East Street Area 2/USEPA Area 4*, Golder Associates, May 1996.
- *Revised Addendum to MCP Supplemental Phase II Scope of Work and Proposal for RCRA Facility Investigation of East Street Area 2/USEPA Area 4*, BBL, September 1998.

As part of the pre-design activities performed under the CD, the following documents were prepared between June 2000 and March 2001 to propose the scope of pre-design investigations for the 30s Complex, and then to report on the results of those investigations:

- *Pre-Design Investigation Work Plan for Removal Actions for 20s, 30s, and 40s Complexes* (Pre-Design Work Plan), BBL, January 2000, revised and resubmitted June 2000. (EPA conditional approval of this work plan was provided in a letter to GE dated October 16, 2000.)
- *Pre-Design Investigation Report for Removal Actions for 20s, 30s, and 40s Complexes* (Pre-Design Report), BBL, March 2001. (EPA approval of this report was provided in a letter to GE dated August 7, 2001.)

Following the completion of the pre-design investigations, and with EPA approval that the requirements for pre-design activities had been satisfied, GE initiated technical RD/RA evaluations using the available data set. These evaluations, conducted in accordance with the procedures established in the SOW, were documented in the Conceptual RD/RA Work Plan, which was submitted to EPA in December 2001. One of the findings of the RD/RA evaluations was the need to conduct supplemental pre-design sampling activities within the 30s

Complex to further evaluate certain volatile and semi-volatile organic constituents that had not been detected in the pre-design investigations, but had elevated detection limits. The proposed sampling activities were identified in the Conceptual RD/RA Work Plan and the results were included in a February 2002 addendum to that work plan.

Subsequent to the submittal and EPA approval of the Conceptual RD/RA Work Plan (and related follow-up documents), certain additional investigations were performed by GE in conjunction with its ongoing building demolition activities and/or as part of discussions with EPA and PEDDA concerning the future transfer of the 30s Complex to PEDDA. The scope and results of these activities were documented in various GE submittals to EPA, along with revisions (as necessary) to the RD/RA evaluations presented in the Conceptual RD/RA Work Plan. The following list summarizes the correspondence between GE and EPA concerning the proposed scope of additional investigations, EPA's approval of the sampling proposals, the results of the investigations (and any related RD/RA evaluations), and EPA's approval of the subsequent reports.

- October 8, 2002 letter from GE to EPA regarding various activities related to the removal of an aboveground fuel storage tank in the vicinity of the former Building 31 Powerhouse. That letter included a description of soil removal activities, post-removal soil sampling results, and a review of the technical RD/RA evaluations in light of the new sampling data.
- November 7, 2002 letter from EPA to GE providing approval of GE's October 8, 2002 letter and the findings/evaluations presented therein.
- December 20, 2002 letter from GE to EPA proposing additional sampling and analysis of soils and building materials related to Buildings 33, 33-A, 33-E, 33-X, and 34 (Building 33/34 Area). Such investigations were proposed to support PEDDA's planning related to future re-development activities.
- January 13, 2003 letter from EPA to GE conditionally approving GE's December 20, 2002 submittal and the investigation proposal presented therein.
- March 10, 2003 letter from GE to EPA summarizing the results of the Building 33/34 Area building material sampling and analysis activities, and including a proposal to use certain demolition debris as fill and grading material within the 30s Complex.

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- April 11, 2003 letter from GE to EPA summarizing the results of the additional soil sampling in the Building 33/34 Area, and evaluating the new data with respect to the previously completed technical RD/RA evaluations.
 - April 24, 2003 letter from EPA to GE conditionally approving GE's March 10, 2003 submittal and the evaluations/proposals contained therein.
 - May 22, 2003 letter from EPA to GE conditionally approving GE's April 11, 2003 submittal and the findings presented therein.
 - March 3, 2004 letter from GE to EPA proposing additional soil investigations for PCBs and other Appendix IX+3 constituents within the uppermost 6 feet of soils within the 30s Complex. Such investigations were proposed to further assess soils located in currently paved areas of the RAA, and to support a revision of the ERE and PEDDA's future re-development plans.
 - March 9, 2004 letter from EPA to GE conditionally approving GE's March 3, 2004 investigation proposal.
 - June 7, 2004 letter from GE to EPA presenting the results of the supplemental soil investigations within the uppermost 6 feet of soil in paved areas, and providing a re-assessment of the previously completed RD/RA evaluations.
 - June 30, 2004 letter from EPA to GE providing conditional approval of GE's June 7, 2004 submittal and the findings presented therein.

The soil sampling locations related to the pre-design investigations, as well as those locations related to the additional investigations identified above, are shown on Figure 2. Additional, general information regarding the scope of the specific investigation efforts summarized above can be found in the Data Compilation Report, while the specific documents themselves provide additional details.

3. Summary of RD/RA Soil Evaluations

Following completion of the pre-design soil investigations, related reporting, and EPA approval, GE performed technical RD/RA evaluations to assess the need for soil remediation actions to achieve the applicable Performance Standards established in the CD and SOW. The RD/RA evaluations were performed in accordance with the procedures established in Technical Attachments E and F of the SOW for PCBs and other Appendix IX+3 constituents in soil, respectively. These evaluations resulted in the determination that current conditions at the 30s Complex already achieve the applicable soil-related Performance Standards, such that no remediation actions for soils were necessary. This determination was initially presented in the Conceptual RD/RA Work Plan, submitted to EPA in December 2001. That document was subsequently supplemented by three additional submittals: (1) a February 7, 2002 submittal titled *Revised PCB Spatial Averaging Tables*, prepared by GE; (2) a February 15, 2002 submittal titled *Addendum to Conceptual RD/RA Work Plan*, prepared by GE (which presented the results of supplemental pre-design soil sampling for, and an evaluation of, the volatile and semi-volatile organic constituents that had not been detected but had elevated detection limits); and (3) a March 4, 2002 submittal titled *Revised Risk Evaluation of Appendix IX+3 Constituents in Soils*, prepared by GE's risk assessment consultants at AMEC Earth & Environmental. The Conceptual RD/RA Work Plan, as supplemented by these three additional submittals, was conditionally approved by EPA in letter dated March 19, 2002. In that letter, EPA indicated its concurrence with GE's conclusion that no soil-related remediation was necessary at the 30s Complex.

As discussed in Section 2 of this Final Completion Report, a number of additional investigations were subsequently conducted by GE at the 30s Complex, either in conjunction with building demolition activities or as part of other activities related to the future transfer of the 30s Complex to, and subsequent redevelopment by, PEDA. Specifically, a total of four such subsequent investigations (identified in Section 2) were conducted that resulted in new PCB and/or other Appendix IX+3 data. With the receipt of new sampling data from these investigations, it was necessary to determine whether such data could change the previous conclusions of the technical RD/RA evaluations. Therefore, as part of each investigation activity, GE reviewed the new data to assess whether the data could potentially affect the findings previously presented in the Conceptual RD/RA Work Plan, and if so, whether modifications to the detailed RD/RA evaluations were warranted.

For each investigation activity, GE's submittal of the sampling results also included such an assessment of the new data. These submittals were provided to EPA on October 8, 2002, March 10, 2003, April 11, 2003, and June 7, 2004. In each case, it was determined that the new data would not change the conclusion presented in

the Conceptual RD/RA Work Plan that no soil-related remediation actions were needed at the 30s Complex to achieve the applicable Performance Standards established in the CD and SOW. EPA concurred with GE's findings in each of these supplemental investigation and RD/RA evaluation activities.

4. Summary of Building Demolition and Related Activities

In preparation for the transfer of the 30s Complex to PEDDA (in accordance with the DEDA), GE has conducted various building demolition activities concurrently with the performance of the soil investigations and RD/RA-related activities described in Sections 2 and 3 of this Final Completion Report. For the purposes of this report, the demolition activities performed by GE within the 30s Complex RAA will be grouped into two primary areas – the former Building 31 Powerhouse and the former Building 33/34 Area. For each of these areas, the demolition activities themselves were not subject to the CD and SOW. However, because each activity involved the disposition of some demolition debris within the limits of the 30s Complex (or, for certain materials, at the On-Plant Consolidation Areas [OPCAs] within the GE facility), certain provisions of the CD and SOW are applicable, and EPA review and approval was required. This section provides additional information regarding each of these areas.

4.1 Former Building 31 Powerhouse

The former Building 31 Powerhouse was located in the north-central portion of the 30s Complex. Several structures associated with the former Building 31 Powerhouse were demolished between May and September 2002 in accordance with the following:

- *Demolition/Consolidation Work Plan, Buildings 31, 31J, and 31-P*, submitted by GE to EPA in June 2001, and a follow-up letter from GE dated August 28, 2001, entitled *Supplemental Information for the June 2001 Demolition/Consolidation Work Plan for Buildings 31, 31J, and 31-P* (jointly, Demolition Work Plan), which were conditionally approved by EPA in a letter dated September 5, 2001; and
- Subsequent submittals from GE to EPA dated May 16, 2002 (presenting a revised grading plan); June 3, 2002 (entitled *30s Complex – Building 31 Demolition Project: Consolidation-Related Activities*, summarizing discussions between GE and EPA regarding the revised grading plan and regarding consolidation of certain steel materials at the OPCAs); and July 19, 2002 (summarizing agreements between GE and EPA concerning an area of oil-stained soil associated with a former above-ground fuel storage tank near the former Building 31 Powerhouse.

In general, the demolition approach for this structure involved the demolition of the above-grade portion of the buildings, followed by the placement of certain of the demolition debris (e.g., steel, brick, concrete, etc.) and other clean backfill materials in the subgrade portion of the former building foundation. Following the consolidation of this demolition debris in the former building foundation, an engineered barrier (constructed in accordance with the requirements of Technical Attachment G to the SOW) was installed over the demolition debris and other backfill. This barrier consisted of an impermeable asphalt cover constructed over the footprint of the former Building 31 Powerhouse, as shown on Figure 3.

Consistent with the CD and SOW, the technical RD/RA evaluations summarized in Section 3 of this Final Completion Report did not consider the soils present beneath the footprint of the engineered barrier. In addition, the footprint of this area has been identified as “Building Demolition Barrier Area” in the ERE and associated mapping of the 30s Complex, and future construction activities within this area are prohibited. Finally, as discussed in Section 7 of this Final Completion Report, the engineered barrier will be subject to periodic future inspection and maintenance activities.

4.2 Building 33/34 Area

One of the supplemental investigation and evaluation activities performed by GE following the pre-design investigations and subsequent RD/RA evaluations involved an assessment regarding the potential use of certain building demolition debris from the Building 33/34 Area (e.g., brick, concrete, etc.) as general fill and grading material within the 30s Complex. Use of this material would facilitate PEDDA’s re-development activities, while reducing the future materials costs associated grading the current property. In a letter to EPA dated December 20, 2002, GE proposed to supplement the available building material sampling results (previously collected by GE to evaluate potential disposition options for the demolition debris) with additional sample collection for PCB and Appendix IX+3 analyses. EPA approved GE’s proposed investigations in a letter dated January 13, 2003.

Following sample collection and analyses, GE evaluated the collective data set under the assumption that, once the building demolition activities were performed and the materials subject to re-use were crushed and processed, the demolition debris would represent soil to be placed within the 30s Complex. As such, the available data set was used to represent those materials, and compared to the results of the pre-design investigation data and findings of the Conceptual Work Plan. GE’s evaluation was presented in a letter to EPA dated March 10, 2003, which concluded that the use of this material would not change the findings of the previous RD/RA evaluations. EPA approved GE’s evaluation and conclusion in a letter dated April 24, 2004.

Subsequently, GE proceeded to conduct demolition activities for the Building 33/34 Area, process/crush the suitable demolition debris, and place/grade the materials in the vicinity of the former building area. Figure 3 presents the final conditions, including the restored surface elevations, following the performance of these building demolition activities and placement of the demolition debris.

5. Post-RD/RA Activities

Following the completion of the technical RD/RA evaluations, and the determination that current soil conditions with respect to PCBs and other Appendix IX+3 constituents achieve the applicable Performance Standards, GE performed other activities necessary to achieve the remaining Performance Standards, prepare the 30s Complex for transfer to PEDDA, and complete the activities necessary to request from EPA a Certification of Completion. This section describes these activities.

5.1 Grant of Environmental Restriction and Easement (ERE)

The CD (Paragraphs 24.a and 54) requires that GE execute and record an ERE for the 30s Complex in order to satisfy one of the applicable Performance Standards. Based on discussions among EPA, MDEP, PEDDA, and GE, as well as the results of supplemental soil investigations conducted by GE in March 2004, the ERE prepared for the 30s Complex included a number of agreed-upon modifications to the model ERE provided in Appendix L of the CD. The 30s Complex ERE includes two current types of restricted areas, referred to as the “Building Demolition Barrier Area” and the “General Commercial Area,” which are depicted on a Plan of Restricted Area referenced in the ERE and shown on Figure 3. As noted above, the Building Demolition Barrier Area consists of the area of the engineered barrier that was installed over the building demolition debris placed in the foundation of the former Building 31 Powerhouse; excavations are prohibited in that area (except in emergencies). The General Commercial Area consists of the remainder of the 30s Complex; excavations are permitted in that area subject to the restrictions and requirements set out in the ERE, with only limited requirements applicable to excavations within the top 6 feet of soil.

The fully executed ERE for the 30s Complex, together with associated documentation (including subordination agreements and a title insurance commitment), were submitted to EPA and MDEP on January 28, 2005. The ERE was subsequently approved by EPA and accepted by MDEP as the Grantee, and it was recorded in the Berkshire Middle District Registry of Deeds on February 10, 2005. The Plan of Restricted Area referenced in the ERE was separately recorded on the same date. Further, in accordance with Paragraphs 54.g and 54.h of the CD, GE provided to EPA and MDEP copies of the recorded ERE and Plan of Restricted Area, as well as a final title insurance policy, by letter of February 17, 2005, from GE’s counsel.

5.2 Pre-Certification Inspection

Following execution and recording of the ERE, GE concluded that the 30s Complex Removal Action has been fully performed and that the applicable Performance Standards for this Removal Action have been attained. As a result, a Pre-Certification Inspection of the 30s Complex was conducted in accordance with Paragraph 88.a of the CD. The inspection, held on February 15, 2005, was attended by representatives of EPA, MDEP, GE, and PEDDA. Based on the outcome of that inspection (during which no issues regarding the completed response actions were identified), GE maintains its conclusion that the Removal Action is complete and that the Performance Standards have been achieved. Therefore, in accordance with Paragraph 88.a of the CD, GE has prepared this report requesting EPA to provide a Certification of Completion for the 30s Complex Removal Action. This report includes the required statements prepared by GE's Project Coordinator and its Supervising Contractor.

6. Comparison to CD Performance Standards

As noted above, GE's execution and recording of the ERE for the 30s Complex have satisfied the Performance Standard requiring such actions. This section summarizes the basis for GE's conclusion that existing soil conditions at the 30s Complex satisfy the other applicable Performance Standards for PCBs and other Appendix IX+3 constituents.

6.1 Evaluations for PCBs in Soil

The PCB-related Performance Standards for soils within the 30s Complex pertain to specific soil depth increments (i.e., 0 to 1 foot, 1 to 6 feet, and 0 to 15 feet), as well as to the 1- to 6-foot depth increment in subsurface utility corridors for utilities that may be subject to future emergency repair. For each of these depth increments, the need for remediation is based on comparison of a spatial average PCB concentration (calculated in accordance with Attachment E of the SOW) to numerical, risk-based concentrations established in the CD and SOW. The soil data used to support these evaluations included usable historical data, pre-design sampling data collected in accordance with the Pre-Design Work Plan, and certain other sampling data collected subsequent to the Pre-Design Investigation Report as summarized in Section 2. (In accordance with the SOW, the pre-design soil samples were generally collected on an approximate 100-foot grid in unpaved areas and at a frequency of approximately two samples per acre in paved areas, including building slabs. The samples collected during the subsequent sampling in 2004 to further assess soils within the upper 6 feet in paved areas were collected on an approximate 100-foot grid after taking into account the prior data.)

A summary of the evaluations is presented below.

Performance Standard - For the 0- to 1-foot depth increment, remediation is required if the spatial average PCB concentration in the top foot of the unpaved areas or of the overall area (paved and unpaved combined) exceeds 25 ppm. In addition, there must be no soils containing PCB concentrations greater than 125 ppm in the top foot of the unpaved areas.

- **Achieved.** The Conceptual RD/RA Work Plan showed that the spatial average PCB concentrations in the top one foot of soil in unpaved areas (12.39 ppm) and in the overall area (7.32 ppm) are well below 25 ppm, while the maximum PCB concentration in the top foot of unpaved soils in the 30s Complex is

100 ppm, which is below the not-to-exceed level of 125 ppm for such soils. The data used for this demonstration included the results from 68 soil samples (including pre-design, historical, and EPA split samples) collected at 60 locations within the 30s Complex, as well as soil samples collected from three nearby locations within the adjacent 20s Complex. In addition, 34 soil samples were collected from the 0- to 1-foot depth increment during the miscellaneous investigation activities performed following submittal of the Conceptual Work Plan, as described in Section 2. Of those 34 samples, only two had discrete PCB concentrations greater than 7.32 ppm (the overall average concentration for the 0- to 1-foot depth increment presented in the Conceptual Work Plan), and only one of those was greater than the Performance Standard of 25 ppm for this depth increment (RAA2-J5, 38 ppm). Further, the arithmetic average PCB concentration of those 34 samples is 2.29 ppm. As a result, it can be concluded that the data collected since the submittal of the Conceptual Work Plan would not have a significant effect on the average PCB concentrations presented therein for the 0- to 1-foot depth increment.

Performance Standard - For the 1- to 6-foot depth increment, remediation is required if the spatial average PCB concentration in that depth increment exceeds 200 ppm.

- **Achieved.** The Conceptual Work Plan showed that the spatial average PCB concentration for the 1- to 6-foot depth increment (2.64 ppm) is well below 200 ppm. The data used to calculate this spatial average PCB concentration included results from 84 soil samples (including pre-design, historical, and EPA split samples) collected from 66 locations within the 30s Complex, as well as soil samples collected from three nearby locations within the adjacent 20s Complex. In addition, 39 soil samples (including four sample duplicates) were collected from the 1- to 6-foot depth increment during the miscellaneous investigation activities performed following submittal of the Conceptual Work Plan, as described in Section 2. Of those 39 samples, only three had discrete PCB concentrations greater than 2.64 ppm (the average concentration presented in the Conceptual Work Plan), none of which was greater than the Performance Standard of 200 ppm for this depth increment. Further, the arithmetic average PCB concentration of those 39 samples is 0.53 ppm. As a result, it can be concluded that the data collected since the submittal of the Conceptual Work Plan would not have a significant effect on the average PCB concentration presented therein for the 1- to 6-foot depth increment.

Performance Standard - Where utilities potentially subject to emergency repair (e.g., water, gas, sewer, electricity, communication, and stormwater) are present and the spatial average PCB concentration in the corresponding utility corridor exceeds 200 ppm in the 1- to 6-foot depth increment, GE must evaluate

whether any additional response actions are necessary. In addition, in the event that a new subgrade utility is installed or an existing subgrade utility is repaired or replaced in the future, the spatial average PCB concentration of the backfill materials must be at or below 25 ppm.

- **Achieved.** As discussed in the Conceptual Work Plan and in the reports on subsequent investigations, the maximum PCB concentration detected in soils within the uppermost 6 feet of soil within the 30s Complex was less than 200 ppm. As a result, any spatial average calculation for soils in close proximity to a subsurface utility would necessarily be below 200 ppm. The ERE includes provisions related to future installation or repair of subgrade utilities.

Performance Standard - If the spatial average PCB concentration for the 0- to 15-foot depth increment exceeds 100 ppm (after incorporating the performance of any other required remediation), GE is required to install an engineered barrier.

- **Achieved.** The Conceptual Work Plan showed that the spatial average PCB concentration for the 0- to 15-foot depth increment (4.05 ppm) is well below 100 ppm. The data used to calculate this spatial average PCB concentration included the results from the soil samples collected to evaluate the 0- to 1-foot and 1- to 6-foot depth increments (as described above), plus data from an additional, deeper 102 soil samples (including pre-design, historical and EPA split samples) collected from 65 locations within the 30s Complex, as well as two nearby locations in the adjacent 20s Complex. In addition, a total of 84 soil samples (including five sample duplicates) were collected from the 0- to 15-foot depth increment (including samples from the 0- to 1-foot and 1- to 6-foot depth increments, as well as deeper samples) during the miscellaneous investigation activities performed following submittal of the Conceptual Work Plan, as described in Section 2. Of those 85 samples, only three had discrete PCB concentrations greater than 2.64 ppm (the average concentration presented in the Conceptual Work Plan), none of which was greater than the Performance Standard of 100 ppm for this depth increment. Further, the arithmetic average PCB concentration of those 84 samples is 1.27 ppm. As a result, it can be concluded that the data collected since the submittal of the Conceptual Work Plan would not have a significant effect on the average PCB concentration presented therein for the 0- to 15-foot depth increment.

Based on the above comparisons, the applicable Performance Standards for PCBs in soil at the 30s Complex have been achieved.

6.2 Evaluations for Non-PCB Appendix IX+3 Constituents in Soil

The Performance Standards established in the CD and SOW for non-PCB Appendix IX+3 constituents in soil set forth a prescribed process that includes and considers (as needed) several evaluation components. This process includes: (1) comparison to specific EPA-established Preliminary Remediation Goals (PRGs) for dioxin/furan Toxicity Equivalency Quotients (TEQs); and (2) several steps for other non-PCB constituents, including (a) a screening step based on comparison of maximum detected concentrations to EPA Region IX PRGs (or surrogate PRGs), (b) comparison of average concentrations of the remaining constituents to the Method 1 soil standards set forth in the Massachusetts Contingency Plan (MCP), and (c) if any of those Method 1 standards is exceeded, the performance of an area-specific risk assessment for all constituents that were retained following the screening, using the same exposure scenarios and assumptions used by EPA in developing the PCB Performance Standards. For the 30s Complex, the Appendix IX+3 evaluations for constituents other than PCBs and dioxins/furans were conducted using the area-specific risk evaluation method. For the 30s Complex, a total of 86 soil samples (including historical and EPA split samples) were analyzed for one or more of the non-PCB Appendix IX+3 constituent groups.

Performance Standards - For dioxins/furans, a total TEQ concentration must be calculated for each sample, using the Toxicity Equivalency Factors (TEFs) published by the World Health Organization. For each relevant depth increment, the maximum TEQ concentration or the 95% upper confidence limit (95% UCL) on the mean of TEQ concentrations, whichever is lower, must be compared to the applicable PRG established by EPA for such TEQs in commercial/industrial areas – 5 ppb in the top foot and 20 ppb in subsurface soil. If the maximum or 95% UCL TEQ concentration is less than the applicable PRG, no further response actions are necessary.

- **Achieved.** As presented in the Conceptual Work Plan, the maximum TEQ concentrations for soils in the 30s Complex (for each depth increment) were below the applicable PRGs for commercial/industrial areas. As a result, there was no need to calculate the 95% UCLs for the TEQ concentrations. In addition, as shown in reports on subsequent investigations, the dioxin/furan data collected in those subsequent investigations do not show any TEQ levels in excess of the applicable PRGs. Based on these analyses, no response actions to address dioxins/furans are necessary.

Performance Standards – As an initial screening step, the maximum concentrations of all detected constituents must be compared to the EPA Region IX PRGs (or surrogate PRGs approved by EPA) for

industrial areas. For all constituents that are retained after this screening, if an area-specific risk assessment is performed, the average concentrations of those constituents (excluding PCBs and dioxins/furans) must be evaluated using the same exposure scenarios and assumptions used by EPA in developing the applicable PCB Performance Standards (as set forth in Appendix D to the CD), together with standard EPA toxicity values. If the results of that area-specific risk evaluation result in cumulative excess lifetime cancer risks (ELCRs) less than 1×10^{-5} (after rounding) and non-cancer Hazard Indices (HIs) less than 1.0 (after rounding), no further response actions are necessary. In addition, EPA has agreed to the following for an area-specific risk assessment: (1) for the 0- to 15-foot depth increment, since the CD does not contain any specific exposure scenario, the average concentrations are to be compared to the Upper Concentration Limits (UCLs) set forth in the MCP; and (2) since EPA has not established any toxicity values for lead, the concentrations of lead are to be evaluated through the use of models developed by EPA to assess lead exposures – in this case, EPA’s Adult Lead Methodology (ALM).

- **Achieved.** The 30s Complex risk assessment described in the Conceptual Work Plan, as revised in GE’s March 4, 2002 submittal titled *Revised Risk Evaluation of Appendix IX+3 Constituents in Soils* (prepared by AMEC Earth & Environmental), followed the above procedures. It demonstrated that: (1) for the 0- to 1-foot and 1- to 6-foot depth increments, the cumulative ELCRs calculated for those carcinogenic constituents retained for evaluation following the initial screening (i.e., benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, indeno(1,2,3cd)-pyrene, and arsenic) were well below the 1×10^{-5} benchmark; (2) for the same depth increments, the non-cancer HIs calculated for the only retained constituent with a non-cancer Reference Dose (arsenic) were well below 1.0; (3) application of the ALM model to the average lead concentrations for those depth increments showed no hazard due to lead exposures; and (4) the average concentrations of all retained constituents in the 0- to 15-foot depth increment are below the applicable MCP UCLs. In addition, as shown in GE’s reports on subsequent investigations that included sampling for non-PCB constituents (i.e., its letters dated October 8, 2002, March 10, 2003, April 11, 2003, and June 7, 2004), the data collected on non-PCB Appendix IX+3 constituents in those subsequent investigations do not change the foregoing conclusions.

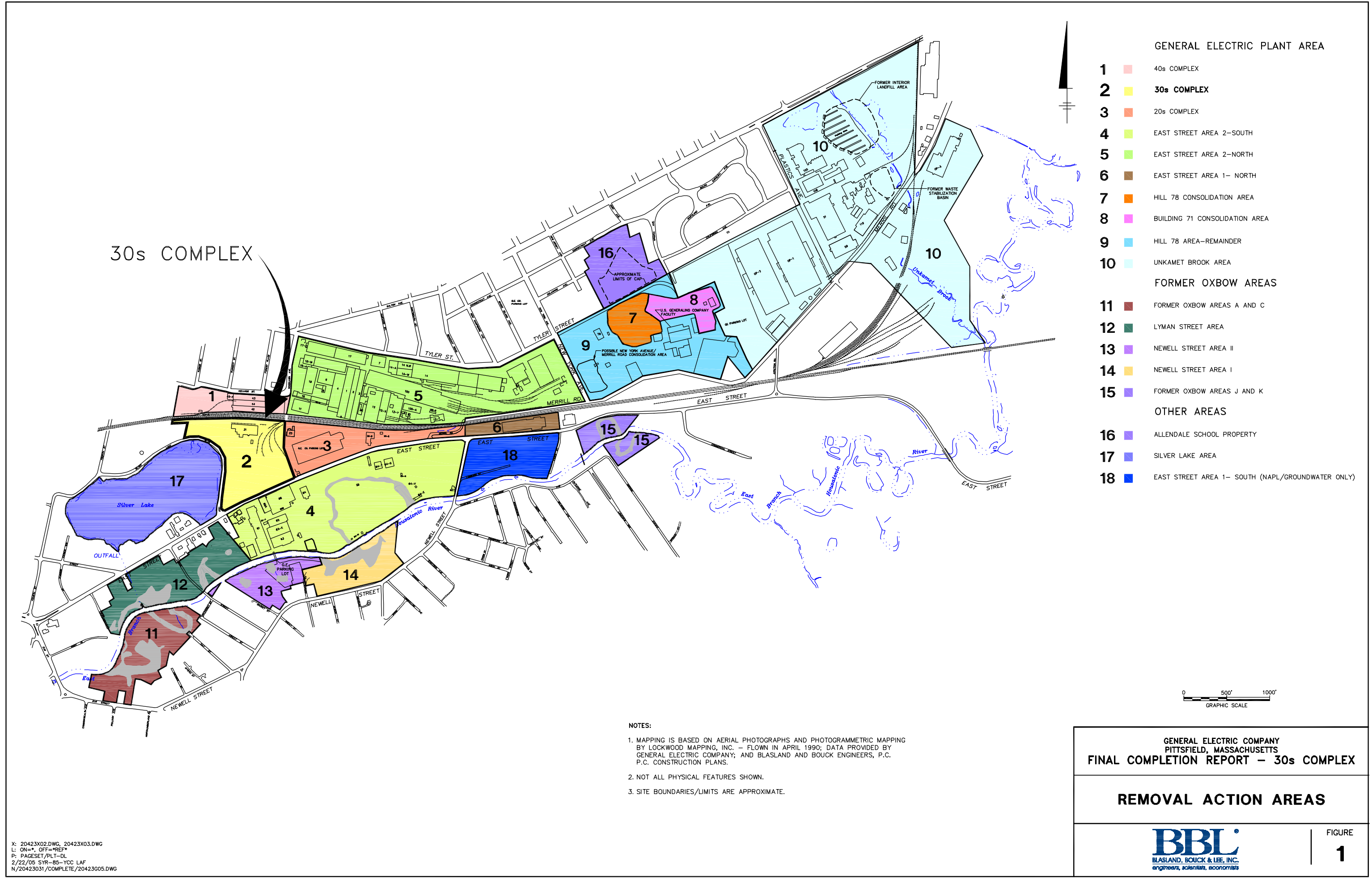
Based on the above comparisons, the applicable Performance Standards for non-PCB Appendix IX+3 constituents in soil at the 30s Complex have been achieved.

7. Future Inspection and Maintenance Activities

Future inspection and maintenance activities related to soils within the 30s Complex will be conducted in accordance with Section 3.7 of the SOW and Paragraph 57.o of the CD. These activities will include semi-annual inspection, maintenance, and repair activities (I/M activities) for the Building Demolition Barrier Area (as defined in the ERE), which consists of the engineered barrier that was installed over the building demolition debris placed in the subgrade foundation of the former Building 31 Powerhouse. These activities will consist of the activities specified in Section 2.1.2 (related to asphalt or concrete engineered barriers) of Technical Attachment J of the SOW, and are described in the Post-Removal Site Control Plan (PRSCP) for the 30s Complex, which is Attachment A to this Final Completion Report. The CD requires that, following transfer of the 30s Complex to PEDDA, these I/M activities are to be performed by PEDDA, as provided in Paragraphs 12.b(ii)(B) and 12.c(ii)(B) of the CD, unless EPA determines that PEDDA has ceased to exist or otherwise will not or cannot perform such obligations.

In addition, as required by Paragraph 57.o of the CD, annual inspections will be conducted at the 30s Complex to assess compliance with the ERE for the preceding year. These annual inspections will be conducted in accordance with Appendix Q to the CD and are described in the PRSCP provided in Attachment A hereto. Consistent with Paragraph 57.o of the CD, following transfer of the 30s Complex to PEDDA, these inspection activities will be conducted by GE until such time, if any, as PEDDA conveys an interest in that property to another party. However, during this period, PEDDA will be responsible for compliance with the requirements of the ERE, as provided in Paragraph 12.b(ii)(A) of the CD and by the terms of the ERE. Following PEDDA's conveyance of an interest in all or a portion of the 30s Complex to another party, the ERE inspection activities for the transferred portion, as well as the obligation to ensure that the ERE requirements are met in that portion, are required to be performed by PEDDA, as provided in Paragraph 12.c(ii)(A) of the CD, unless EPA determines that PEDDA has ceased to exist or otherwise will not or cannot perform such obligations.

Figures



30s COMPLEX

- GENERAL ELECTRIC PLANT AREA
- 1 40s COMPLEX
- 2 30s COMPLEX
- 3 20s COMPLEX
- 4 EAST STREET AREA 2-SOUTH
- 5 EAST STREET AREA 2-NORTH
- 6 EAST STREET AREA 1- NORTH
- 7 HILL 78 CONSOLIDATION AREA
- 8 BUILDING 71 CONSOLIDATION AREA
- 9 HILL 78 AREA-REMAINDER
- 10 UNKAMET BROOK AREA
- FORMER OXBOW AREAS
- 11 FORMER OXBOW AREAS A AND C
- 12 LYMAN STREET AREA
- 13 NEWELL STREET AREA II
- 14 NEWELL STREET AREA I
- 15 FORMER OXBOW AREAS J AND K
- OTHER AREAS
- 16 ALLENDALE SCHOOL PROPERTY
- 17 SILVER LAKE AREA
- 18 EAST STREET AREA 1- SOUTH (NAPL/GROUNDWATER ONLY)

NOTES:

- 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 AND BOUCK ENGINEERS, P.C. CONSTRUCTION PLANS.
- NOT ALL PHYSICAL FEATURES SHOWN.
- SITE BOUNDARIES/LIMITS ARE APPROXIMATE.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
FINAL COMPLETION REPORT - 30s COMPLEX

REMOVAL ACTION AREAS

BBL
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
1

X: 20423X02.DWG, 20423X03.DWG
L: ON=*, OFF=*REF*
P: PAGESET/PLT-DL
2/22/05 SYR-85-YCC LAF
N/20423031/COMPLETE/20423G05.DWG

Attachments

Attachment A

Post Removal Site Control Plan

Attachment A – Post-Removal Site Control Plan

As described in the *Final Completion Report for the 30s Complex Removal Action* (Final Completion Report), the 30s Complex Removal Action, excluding for Post-Removal Site Control activities, has been completed in full satisfaction of the requirements of the Consent Decree (CD), and the Performance Standards set forth in the CD for that Removal Action have been attained. In accordance with Section 3.7 of the *Statement of Work for Removal Actions Outside the River* (SOW), which is Appendix E of the CD, and as required in Technical Attachment J of the SOW, this Post-Removal Site Control Plan (PRSCP) describes the future inspection, maintenance, and repair activities (I/M activities) to be conducted at the 30s Complex. These activities will be focused on the Building Demolition Barrier Area (as defined in the Grant of Environmental Restriction and Easement [ERE] for the 30s Complex), which consists of the engineered barrier that was installed over the building demolition debris placed in the subgrade foundation of the former Building 31 Powerhouse, as described in the Final Completion Report. Construction plans for this barrier area have been included on a CD-ROM disk (provided herewith) for assisting in future assessments and/or repairs of the Building Demolition Barrier Area. These I/M activities will be conducted on a semi-annual basis and will consist of the activities specified in Section 2.1.2 (related to asphalt or concrete engineered barriers) of Technical Attachment J of the SOW, as described further below. The CD requires that, following transfer of the 30s Complex to the Pittsfield Economic Development Authority (PEDA), these I/M activities are to be performed by PEDA, as provided in Paragraphs 12.b(ii)(B) and 12.c(ii)(B) of the CD, unless EPA determines that PEDA has ceased to exist or otherwise will not or cannot perform such obligations.

In addition to these I/M activities, following transfer of the 30s Complex to PEDA, annual inspections will be conducted to assess compliance with the ERE for the preceding year, as required by Paragraph 57.o of the CD. These inspections will be conducted in accordance with Appendix Q to the CD and will include a document review and visual inspection of the entire 30s Complex, as also described below. Consistent with Paragraph 57.o of the CD, these activities will be conducted by the General Electric Company (GE) until such time, if any, as PEDA conveys an interest in the 30s Complex property to another party. However, during this period, PEDA will be responsible for compliance with the requirements of the ERE, as provided in Paragraph 12.b(ii)(A) of the CD and by the terms of the ERE. Following PEDA's conveyance of an interest in all or a portion of the 30s Complex to another party, the ERE inspection activities for the transferred portion, as well as the obligation to ensure that the ERE requirements are met in that portion, are required to be performed by PEDA, as provided in Paragraph 12.c(ii)(A) of the CD, unless EPA determines that PEDA has ceased to exist or otherwise will not or cannot perform such obligations.

Semi-Annual Inspection, Maintenance, and Repair Activities

The engineered barrier which comprises the Building Demolition Barrier Area at the 30s Complex will be inspected on a semi-annual basis (anticipated to be in the spring and fall of each year), subject to approval by the U.S. Environmental Protection Agency (EPA) of a different frequency at a later time. EPA and the Massachusetts Department of Environmental Protection (MDEP) will be provided seven (7) days advance notice prior to performing inspections. These inspections will generally be performed by walking the entire barrier surface area. During these inspections, the overall condition of the engineered barrier surface will be assessed. This assessment will consist of visual inspection of the surface of the barrier for excessive cracking, fissures, spalling, or potholes caused by heaving, uneven settlement, and/or vehicular use. In addition, the restored surfaces will be inspected for evidence of depressions and/or water ponding, excessive rutting, or exposed subbase materials. At a minimum, the following observations will be noted: weather conditions during the inspection, any recent change in use of the barrier surface area, and physical changes and conditions in areas immediately adjacent to the barrier surface area. Any conditions which could compromise the integrity of the barrier surface area, such as soil erosion or excessive vegetative growth, will also be noted.

In the event that areas within the barrier are identified as exhibiting deficiencies or potential problems, those areas will be repaired or replaced. Such repairs may include, but are not limited to, filling cracks, patching asphalt, and/or replacing barrier components.

Inspection reports will be prepared every six months, subject to EPA approval of an alternate frequency. These reports will be submitted to EPA and MDEP and will document the inspection and maintenance activities performed since the submittal of the previous inspection report. 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 the submittal of the previous report;
- Description of any conditions or problems noted during the inspection and/or monitoring period which are or may be affecting the performance of the engineered barrier (photographs of problem areas will be included);

-
- Description of any measures taken to correct conditions which are affecting the performance of the engineered barrier (photographs of physical repairs will be included);
 - Results of sampling analyses and screening, if any, conducted as part of the monitoring and/or inspection program (excluding groundwater monitoring); and
 - Description of any measures that may need to be performed to correct any conditions affecting the performance of the engineered barrier.

As noted above, the CD requires PEDDA to conduct the foregoing I/M activities following transfer of the 30s Complex to PEDDA.

Annual ERE Inspections

Paragraph 57.o. of the CD requires annual inspections at properties transferred from GE to PEDDA to assess compliance with the applicable ERE during the preceding year. These inspections are to be conducted in accordance with the requirements set forth in Appendix Q of the CD. Those requirements include a document review and visual site inspection as further described below. As noted above, these inspection activities will be conducted by GE until such time (if any) as PEDDA conveys an interest in the 30s Complex to another party; and following PEDDA's conveyance of an interest in all or a portion of the 30s Complex to another party, the ERE inspection activities for the transferred portion are required to be performed by PEDDA, unless EPA determines that PEDDA has ceased to exist or otherwise will not or cannot perform such obligations.

Prior to the visual site inspection, the documents pertinent to the ERE and the use of the 30s Complex will be reviewed. These documents will include the ERE, the Plan of Restricted Area (as revised if appropriate), any conditional exceptions approved under the ERE (if known), and any recorded amendments to and/or releases from the ERE. The ERE and Plan of Restricted Area were recorded in the Berkshire Middle District Registry of Deeds on February 10, 2005, in Book 3156, Page 71, and in Plat G, No. 347; respectively. In addition, the most recent topographic map of the 30s Complex that is available to the reviewing party, as well as any Post-Work Notification Forms (Exhibit E to the ERE) that have been submitted by the Grantor under the ERE and of which the reviewing party has a copy, will be reviewed for background information and reference. The reviewing party will not be responsible for verifying the accuracy or completeness of any aspect of or information in the foregoing documents, either as of the time they were prepared or as compared to conditions at the time of the

inspection. After reviewing these documents, a visual on-site inspection of the 30s Complex will be performed to determine whether there is evidence that any of the following have occurred since the last annual inspection:

- Activities at or uses of the 30s Complex that, based on visual observation, are potentially contrary to the restrictions stated in the ERE;
- Utility construction or maintenance work or any building construction, modification, addition, and/or demolition;
- Soil excavations that involved more than 10 cubic yards of soil;
- Significant soil erosion; and
- Significant pavement construction, disturbance, and/or removal/excavation.

If the inspection indicates that any of the above conditions has altered the surface grade of the 30s Complex since the prior inspection, the new surface grade(s) will be compared to the most current prior available drawing of such grade. For the initial comparison, the topographic survey map provided in Attachment C to the Final Completion Report will be used. That figure depicts the limits of the Building Demolition Barrier Area, as well as general features and surface topography of the 30s Complex prior to entry of the ERE. The approximate area/location of any such surface grade change will be identified on a plan.

After all observations have been made, the Annual Inspection Check List provided as Exhibit A-1 to this PRSCP will be completed. Within 30 days of completion of the inspection, a summary ERE inspection report will be submitted to EPA and MDEP. This report will include a summary of the findings of the inspection, an identification (based on the visual inspection) of any instances of potential non-compliance with the ERE, and a copy of the completed Annual Inspection Check List. Any determination of whether activities and uses that have occurred are in fact contrary to the restrictions stated in the ERE will be made by EPA and/or MDEP.

Contact Information

In accordance with Section 2.0 of Technical Attachment J of the SOW, provided below is a table that lists the individuals and contact information who will be conducting the I/M activities at the 30s Complex. The individuals listed below may change during the period that this PRSCP is in effect.

Name	Company/Entity	Telephone Number
John F. Novotny, P.E.	General Electric Company	(413) 448-5905
Thomas E. Hickey, Jr.	Pittsfield Economic Development Authority	(413) 494-7332

EXHIBIT A-1
ANNUAL INSPECTION CHECK LIST
30s COMPLEX RAA

DOCUMENT REVIEW

Conducted By: _____ Representing: _____
Review Start Date: _____

1. Check here to confirm that the Grant of Environmental Restriction and Easement has been reviewed.
2. Check here to confirm that the Plan of Restricted Area (as revised if appropriate) has been reviewed.
3. Are there any recorded amendments to or releases from the ERE, and/or any known conditional exceptions under the ERE, and/or any Post-Work Notification Forms (ERE Exhibit E) which have been submitted by the Grantor under the ERE and of which the reviewing party has a copy?

No

Yes - If yes, review those items for background informational purposes and list them below (along with the book and page reference in the Registry of Deeds where applicable). (Note that the document reviewer has no obligation to verify the accuracy or completeness of any of these documents, either as of the time they were prepared or as compared to current conditions).

4. Review Completed: _____

VISUAL ON-SITE INSPECTION

Conducted By: _____ Representing: _____
Inspection Start Date: _____

1. List other individuals and their company/agency that were present during the visual on-site inspection.

2. Is there any visual evidence of activities and uses of the property since the last inspection that are potentially contrary to the restrictions of the ERE?

No

Yes - If yes, describe below.

3. Is there any visual evidence of utility work or building construction, modification, addition, or demolition since the last inspection?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

EXHIBIT A-1
ANNUAL INSPECTION CHECK LIST
30s COMPLEX RAA

4. Is there any visual evidence of soil excavation that generated more than 10 cubic yards of soil since the last inspection?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. Is there any visual evidence of excessive soil erosion since the last inspection?

No

Yes - If yes, describe below and show the location(s) of such erosion on a plan.

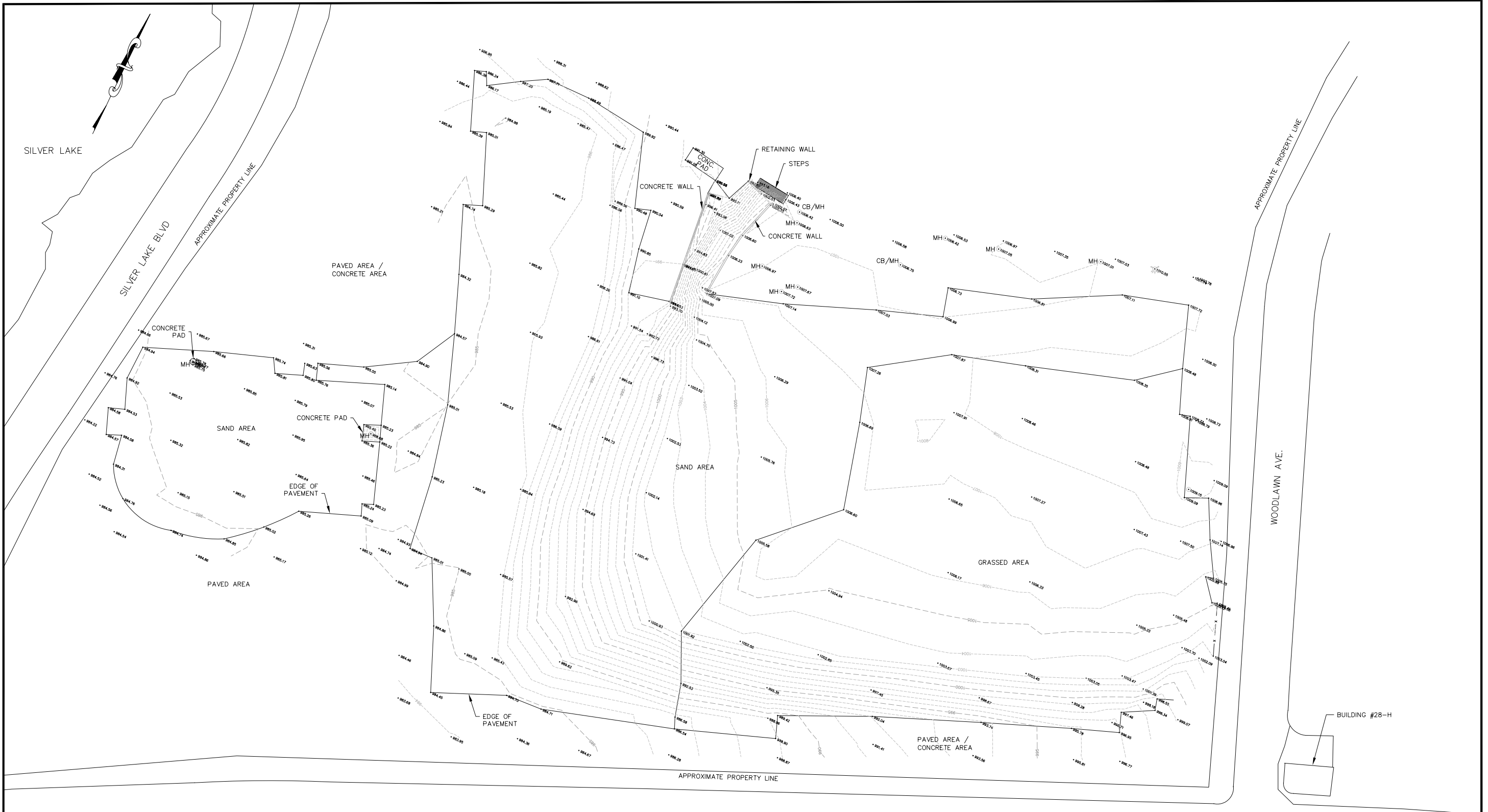
6. Is there any visual evidence of significant pavement construction, disturbance, or excavations since the last inspection?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

7. If any of the conditions listed in the responses to Questions 3 through 6 appears to have altered the surface grade of the the property compared to the surface grade shown on the topographic survey map included in Attachment C of the Final Completion Report or the most current drawing of such grade (if available), identify the approximate area/location of such grade change on a plan.

8. Inspection Completed: _____



SILVER LAKE

SILVER LAKE BLVD

APPROXIMATE PROPERTY LINE

PAVED AREA / CONCRETE AREA

CONCRETE PAD

MH

SAND AREA

CONCRETE PAD

MH

EDGE OF PAVEMENT

PAVED AREA

EDGE OF PAVEMENT

SAND AREA

GRASSED AREA

PAVED AREA / CONCRETE AREA

APPROXIMATE PROPERTY LINE

APPROXIMATE PROPERTY LINE

WOODLAWN AVE.

BUILDING #28-H

EAST STREET

HOUSE #824

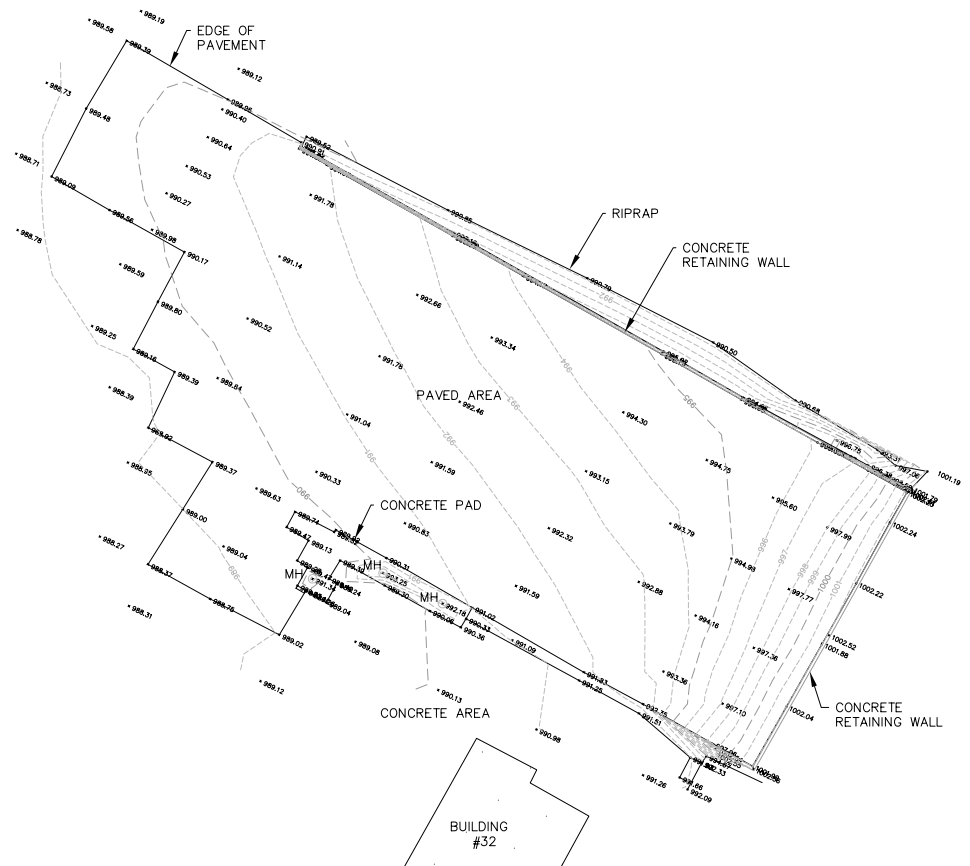
BUILDING #61

BUILDING #66

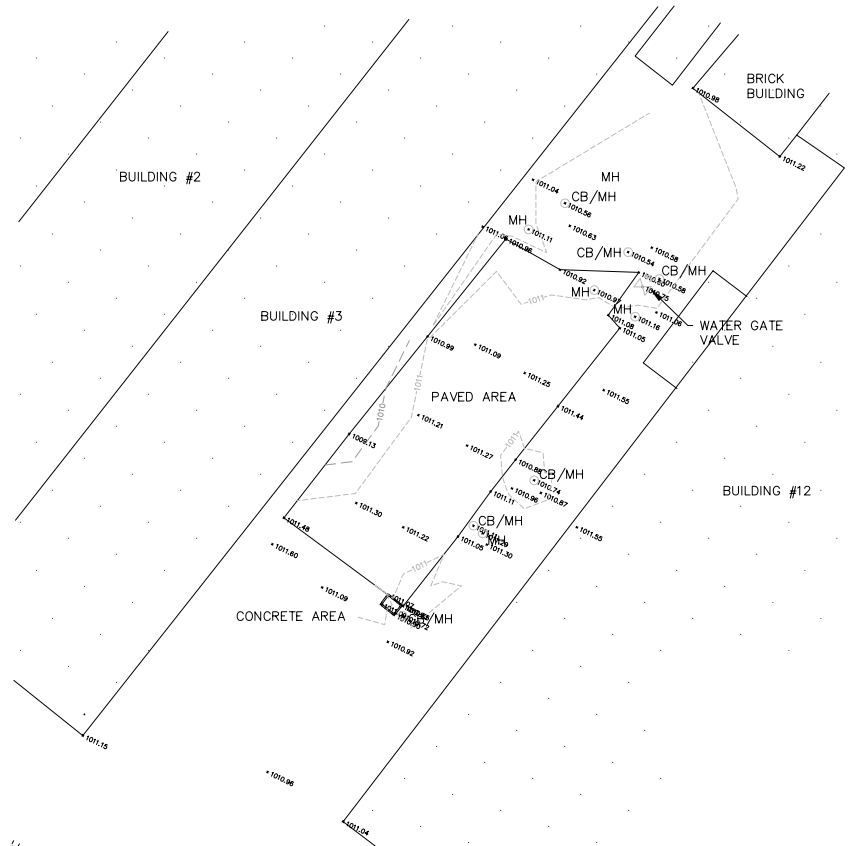
SITE PLAN
BUILDING #33/34 AREA
SCALE: 1" = 30'

REVISIONS:	PROJECT NO. 030195-AB	DRAWN BY: JES/SMS	DATE: JUNE 22, 2004	SCALE: 1" = 30'	AS-BUILT PLAN OF GENERAL ELECTRIC FORMER BUILDING 33/34 AREA PREPARED FOR JACKSON DEMOLITION EAST STREET PITTSFIELD, MASSACHUSETTS	DWG. NO. 1 OF 2
	DESIGNED BY: N/A		APPROVED BY: JMS II			

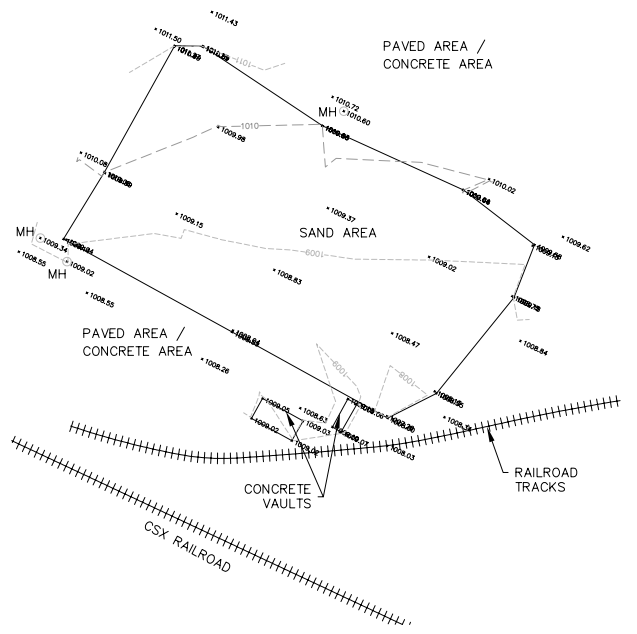
Design Group, Inc.
Civil Engineers * Surveyors * Consultants
2 FEDERICO DRIVE • PITTSFIELD, MASSACHUSETTS 01201 • (413)443-3537



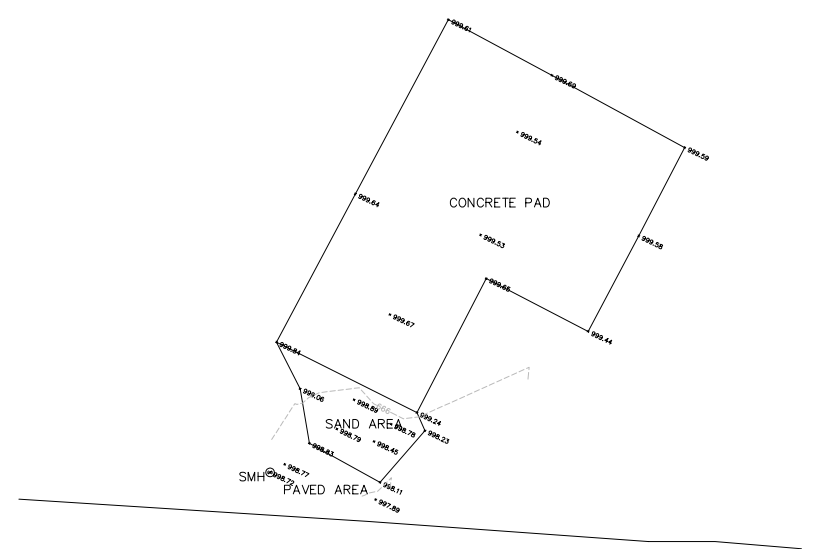
SITE PLAN
BUILDING #31 AREA
SCALE: 1" = 30'



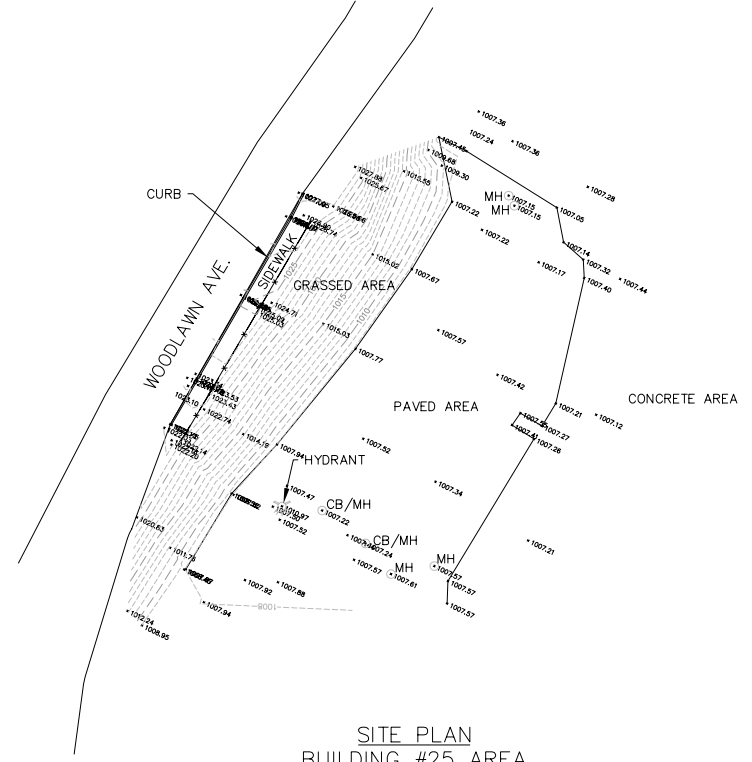
SITE PLAN
BUILDING 3-C AREA
SCALE: 1" = 30'



SITE PLAN
BUILDING #40-B AREA
SCALE: 1" = 30'

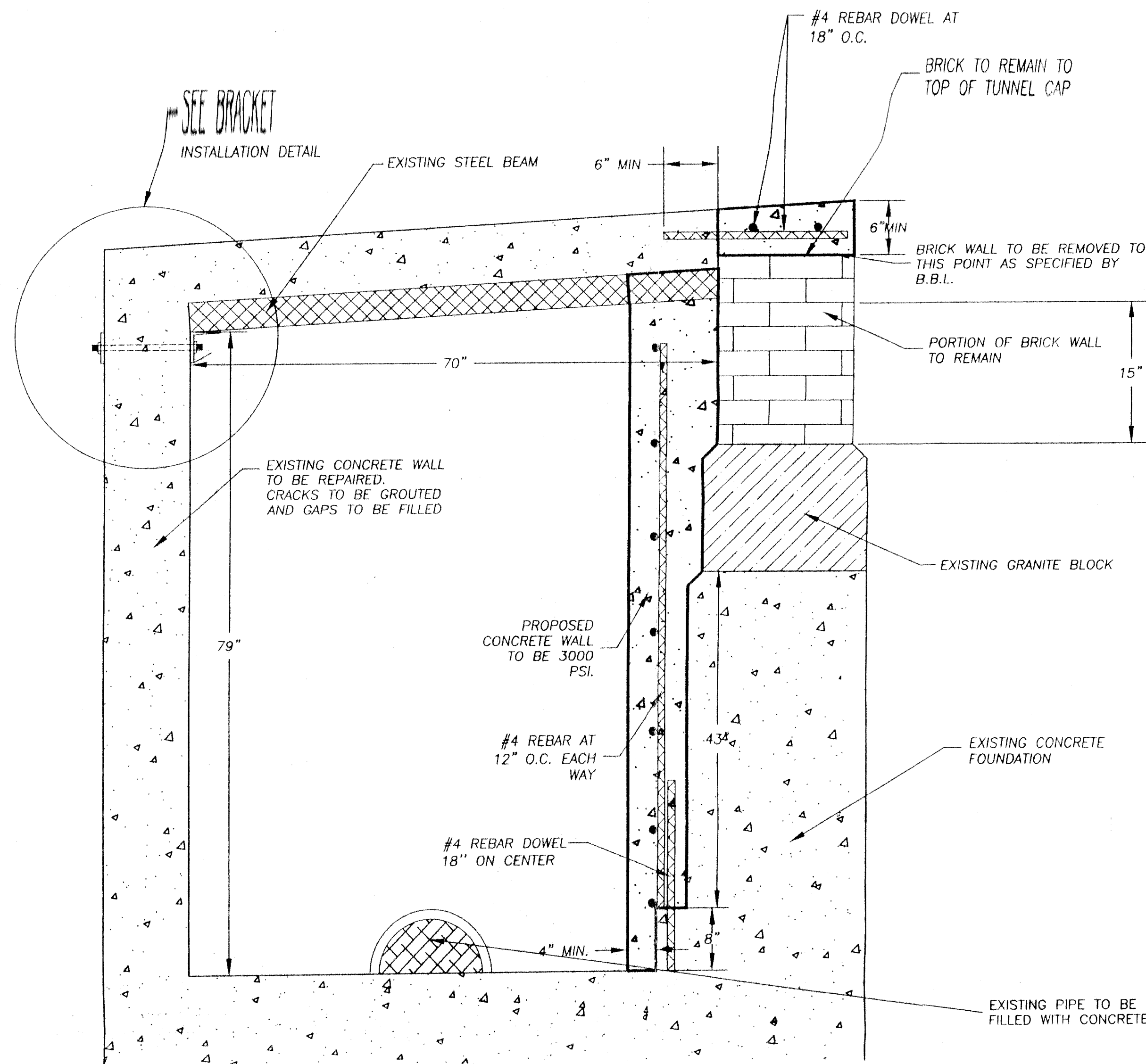


SITE PLAN
BUILDING #29-B AREA
SCALE: 1" = 30'

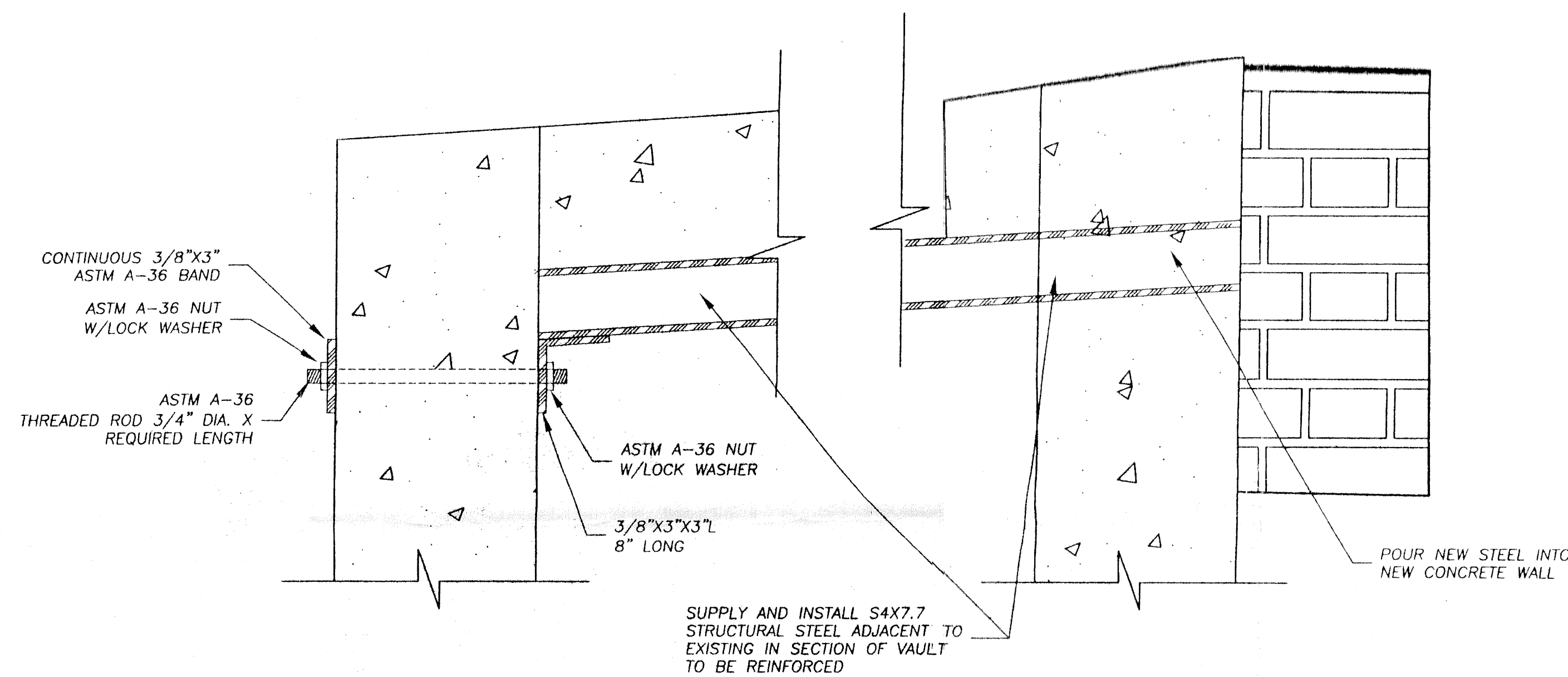


SITE PLAN
BUILDING #25 AREA
SCALE: 1" = 30'

REVISIONS:	PROJECT NO. 030195-AB	DRAWN BY: JES/SMS	DESIGNED BY: N/A	DATE: JUNE 22, 2004	SCALE: 1" = 30'	AS-BUILT PLAN OF GENERAL ELECTRIC FORMER BUILDING AREA'S PREPARED FOR JACKSON DEMOLITION EAST STREET PITTSFIELD, MASSACHUSETTS	DWG. NO. 2	
	Design Group, Inc. Civil Engineers * Surveyors * Consultants 2 FEDERICO DRIVE • PITTSFIELD, MASSACHUSETTS 01201 • (413)443-3537						OF	
							2	



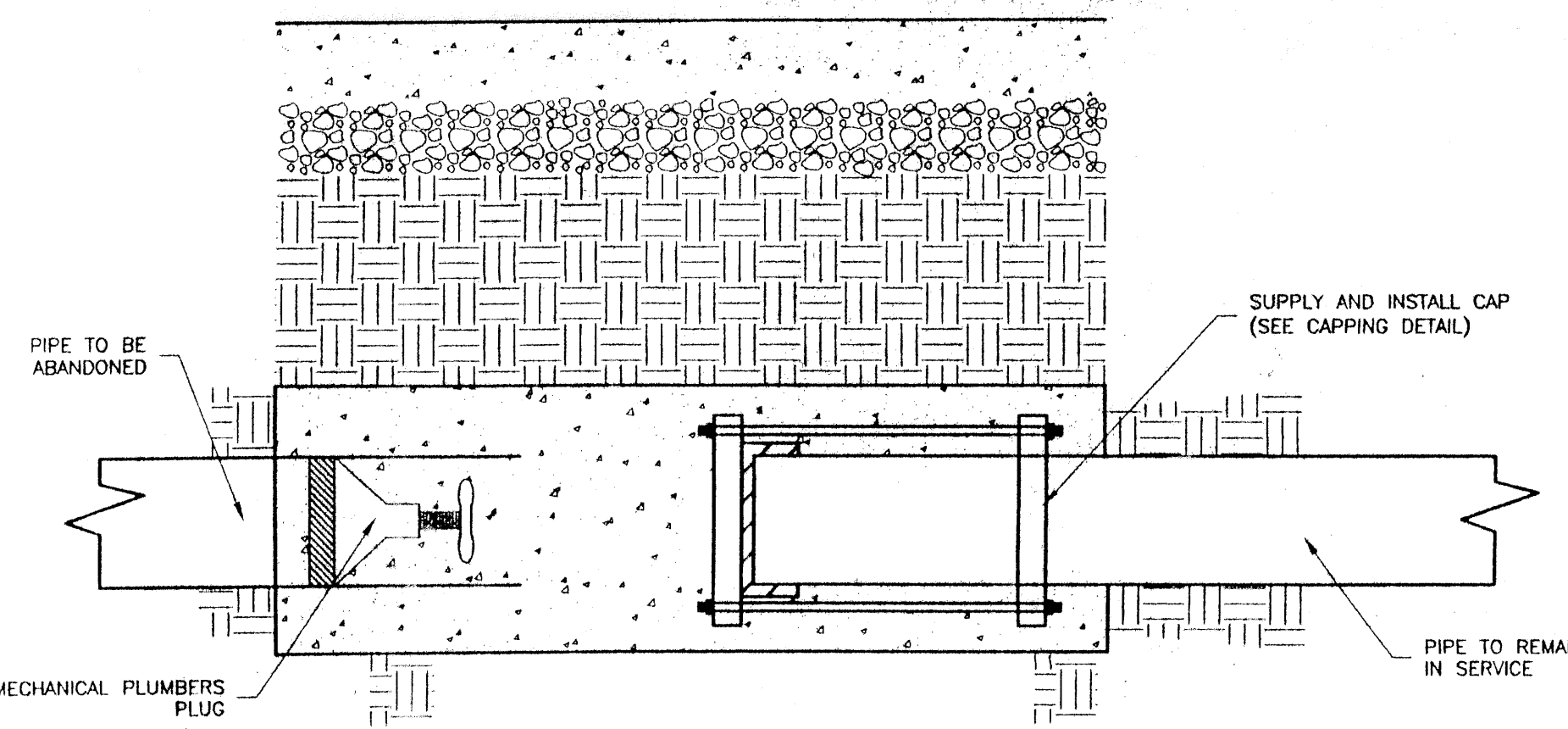
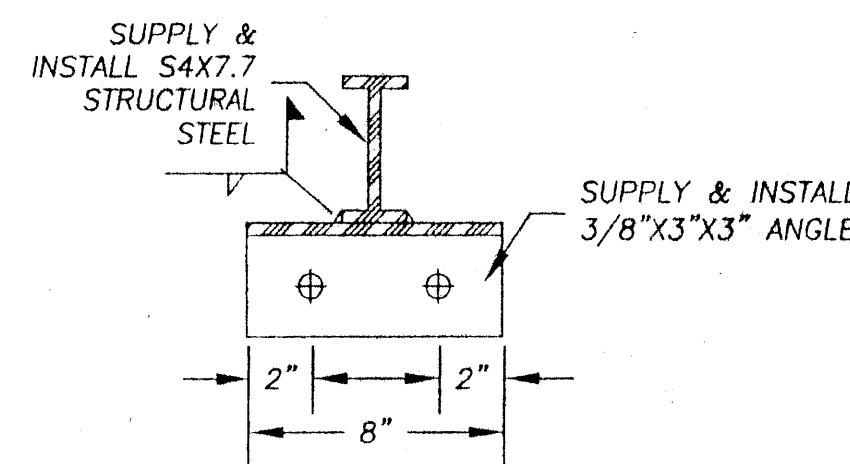
UTILITY TUNNEL REPAIR, STRU-1
SCALE: 1"=1'



BRACKET & STEEL INSTALLATION DETAIL

SCALE: 1"=5'

NOTE:
THIS DETAIL IS TO BE USED FOR A SECTION APPROXIMATELY 20' IN LENGTH, STARTING AT THE POINT WHERE THE NEWER ROOF ENDS AND CONTINUING WEST TO 12' FROM THE BUILDING 31 WALL.

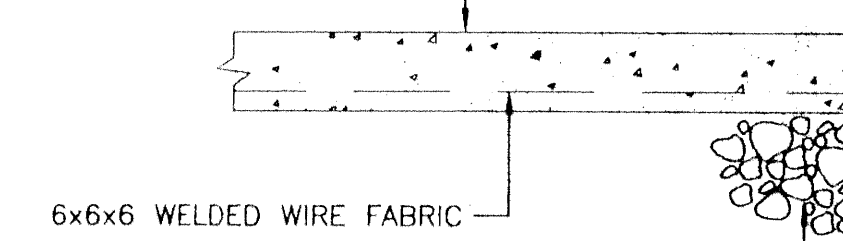


WATER MAIN CUT AND CAP

N.T.S.

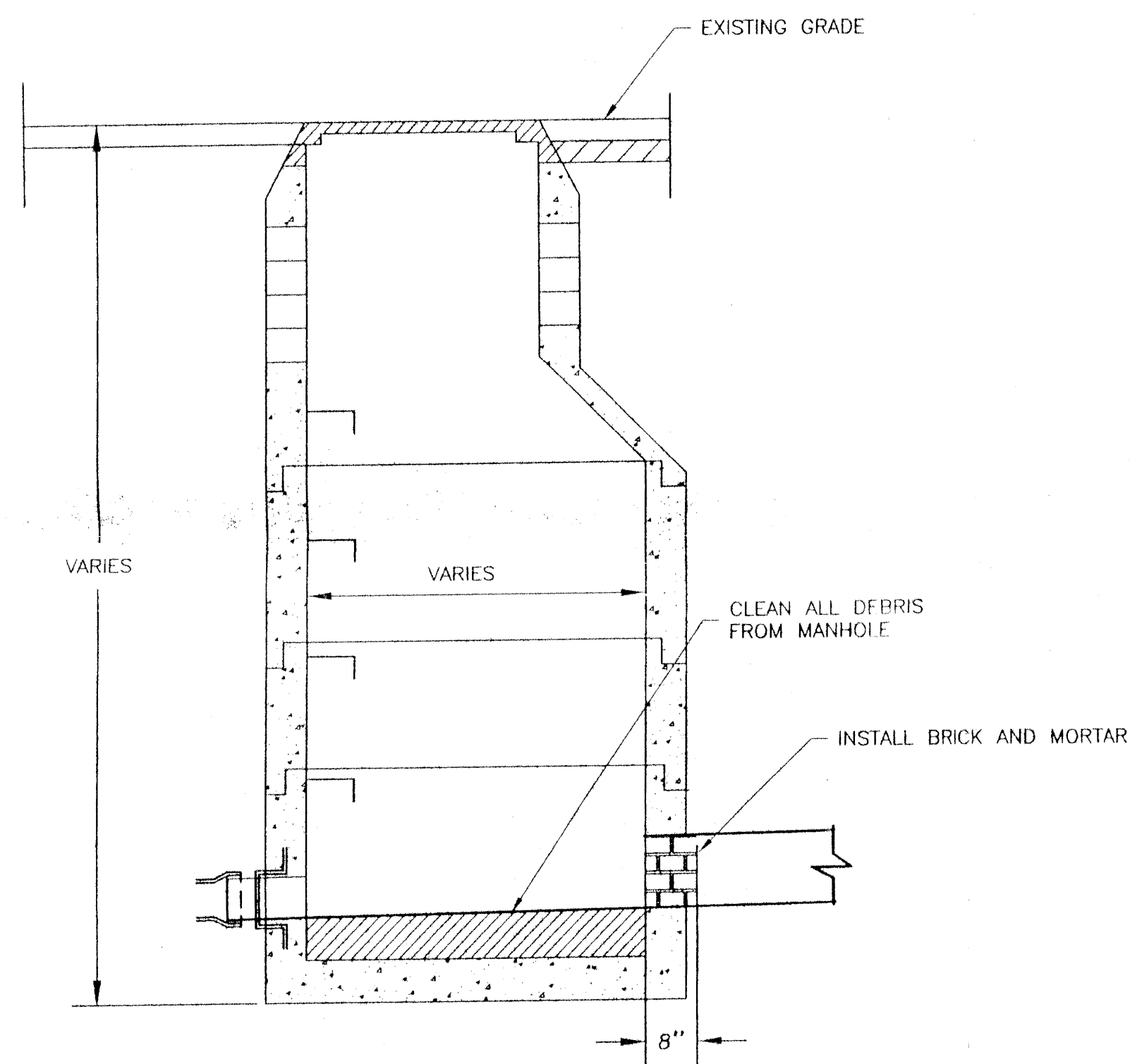
6" CONCRETE PER MASS HIGHWAY STANDARD SPECIFICATIONS FOR HIGHWAYS AND BRIDGES, SECTION 701.4 AND 701.61 3000psi

NOTE: CONTRACTOR TO INSTALL #4 REBAR WHERE NEW CONCRETE MEETS EXISTING. REBAR TO BE EMBEDDED A MIN. OF 6" INTO EXISTING SLABS AND A MIN. OF 12" INTO NEW CONCRETE SLABS.



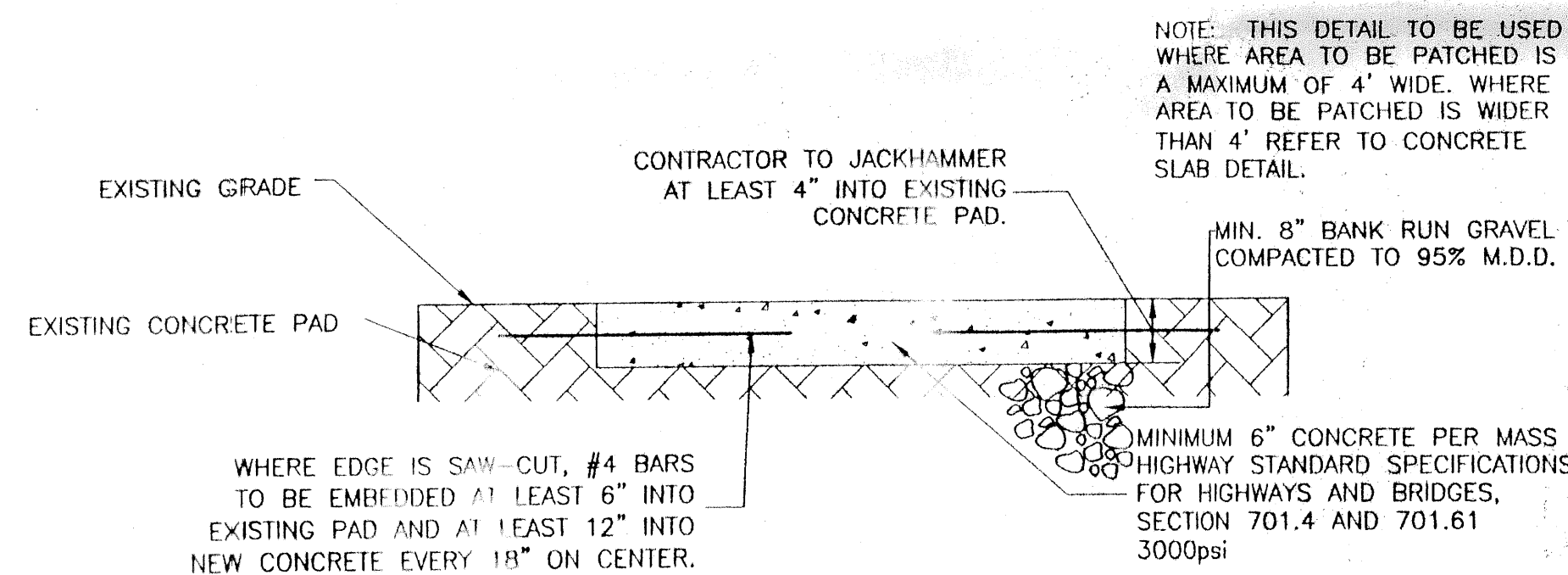
CONCRETE SLAB DETAIL

N.T.S.



TYPICAL MANHOLE CLOSURE

N.T.S.



CONCRETE PATCHING DETAIL

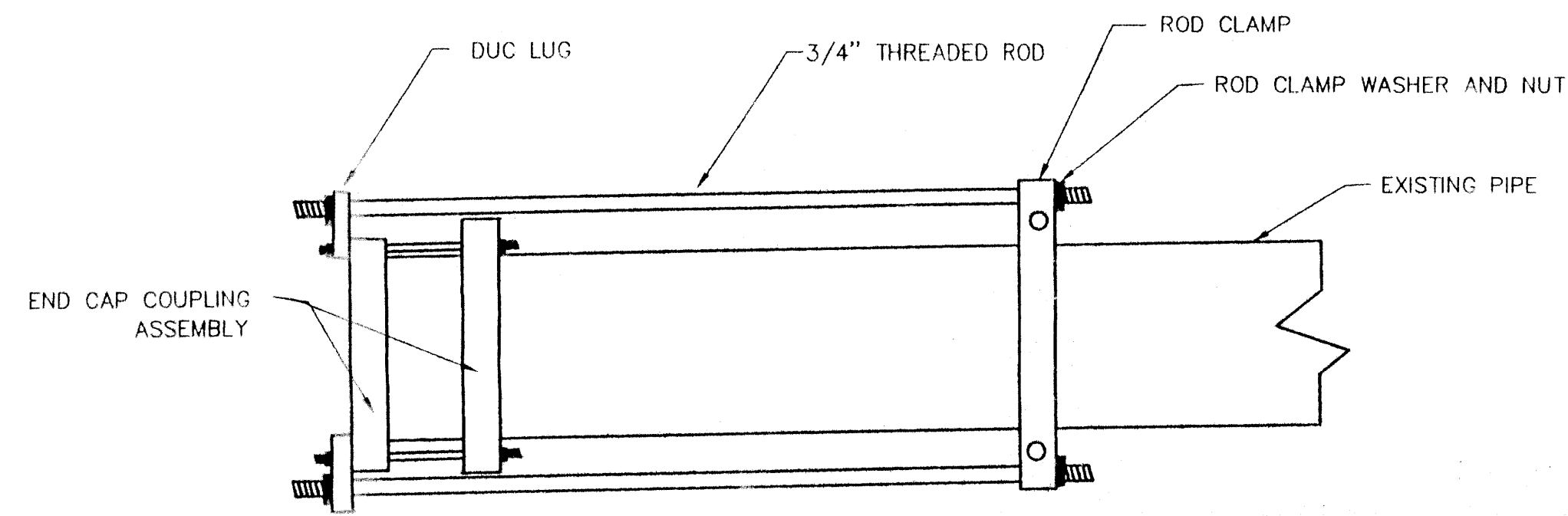
N.T.S.

SCALE: AS NOTED

TITLE: BUILDING 31 DETAILS for GENERAL ELECTRIC			
GENERAL ELECTRIC		PITTSFIELD, MA	
1	INCORPORATE IMPERVIOUS CAP	TMA	06/08/01
WHITE ENGINEERING, INC. CIVIL AND ENVIRONMENTAL			
55 SOUTH MERRIAM STREET PITTSFIELD, MASSACHUSETTS 01201			
FAX (413) 443-8012	PHONE (413) 443-8011		
DATE: MARCH 6, 2001	CK'D:	GE31- D1	
DR'N: JWC	AP'VD:		

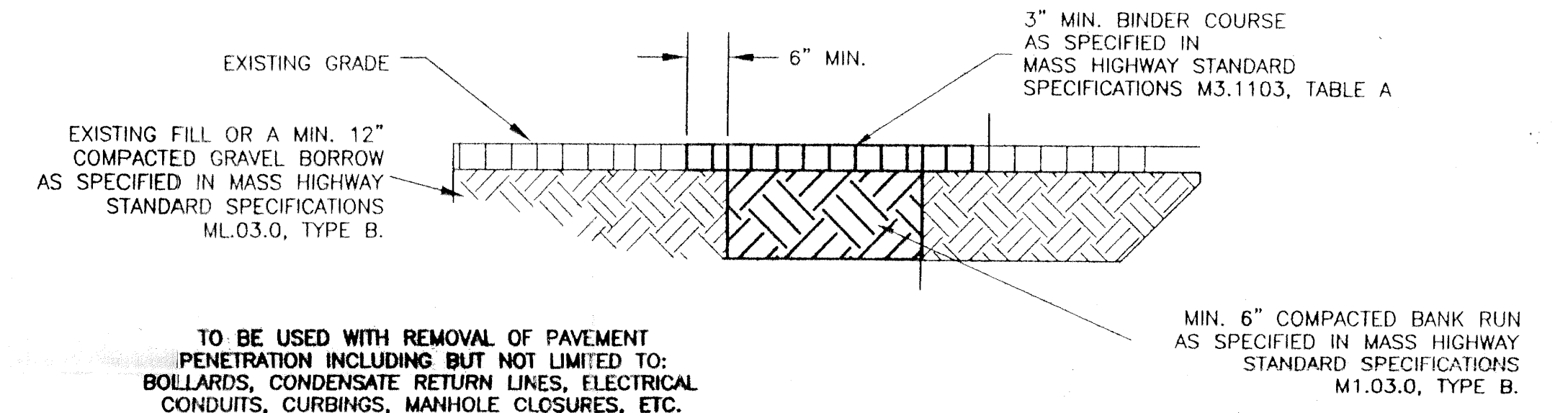
NOMINAL DIAMETER OF FITTING	BEARING AREAS - SQUARE FEET				
	DEAD END	BRANCH OF TEE	90° BEND	45° BEND	BEND <45° >10°
6"	2	2	3	2	2
8"	4	4	5	3	2
10"	6	6	8	4	2
12"	8	8	10	6	3
14"	12	12	16	9	4
16"	12	12	20	10	5

1. ALL BENDS, TEES, HYDRANTS, AND DEAD ENDS SHALL BE BRACED WITH CONCRETE THRUST BLOCKS.
2. BEARING AREA IS AREA OF CONCRETE IN CONTACT WITH WALL OF TRENCH = H X L.
3. HEIGHT (H) AND LENGTH (L) AS REQUIRED TO OBTAIN BEARING AREA IN TABLE.



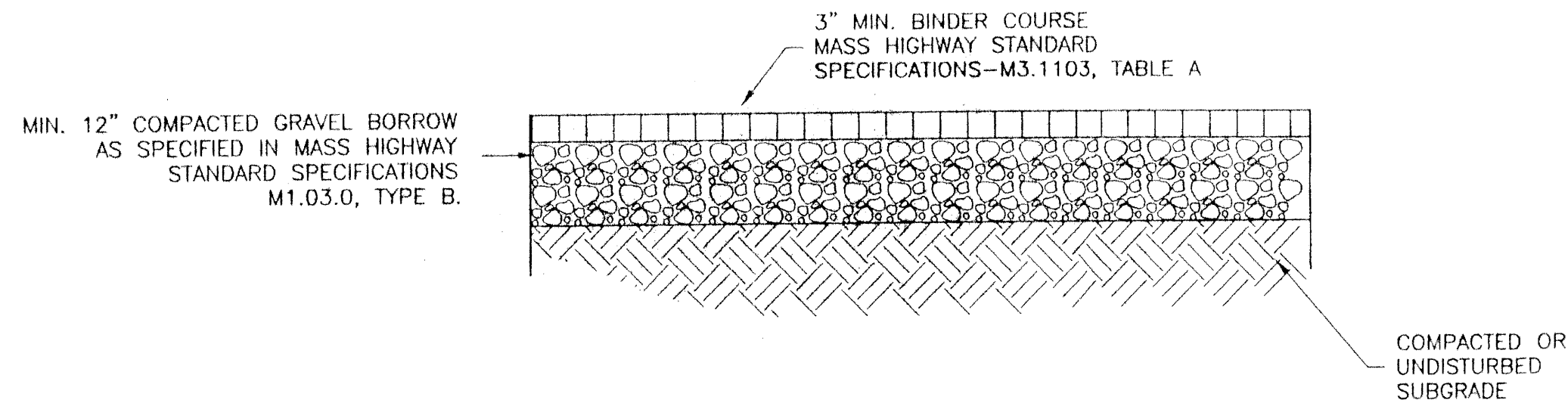
TYPICAL CAPPING DETAIL

N.T.S.



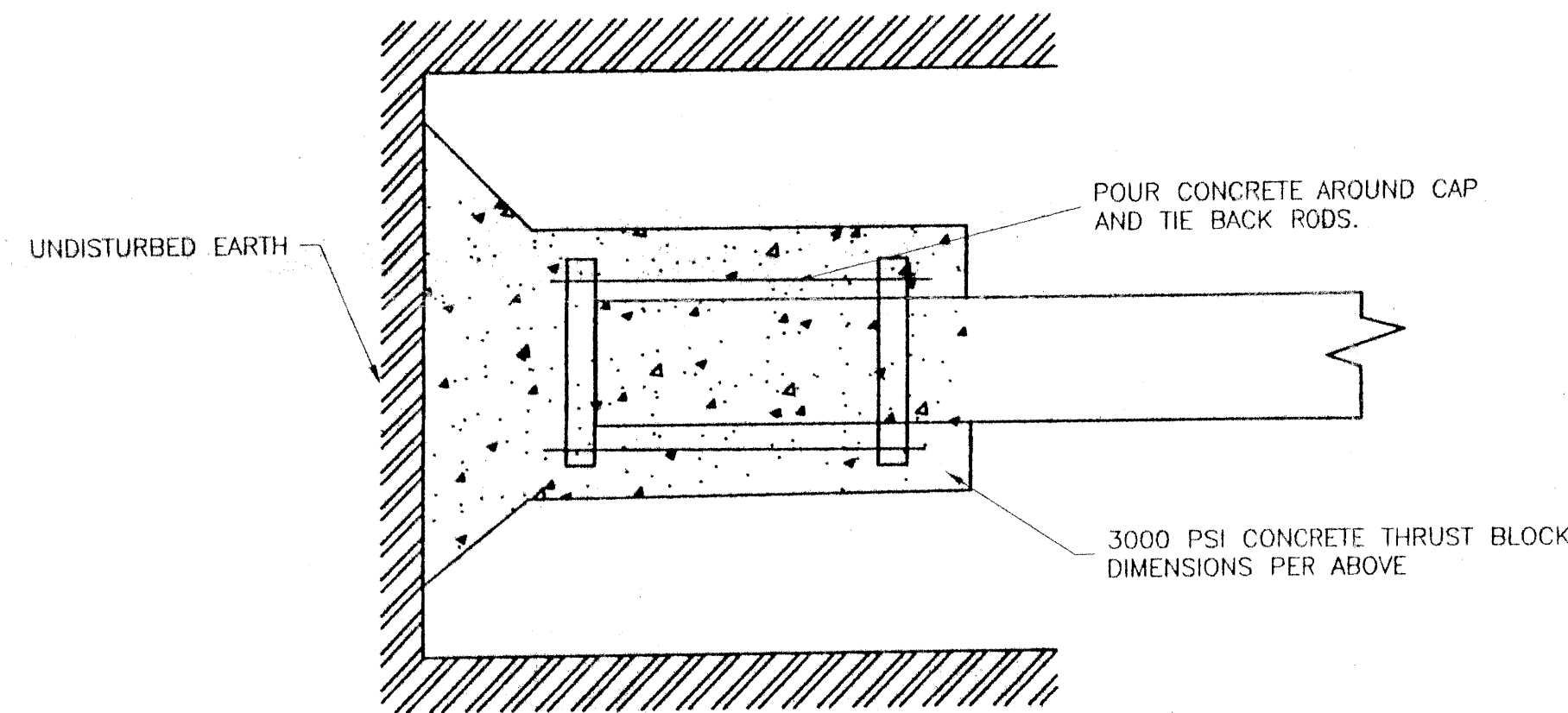
PAVEMENT PATCHING DETAIL

N.T.S.



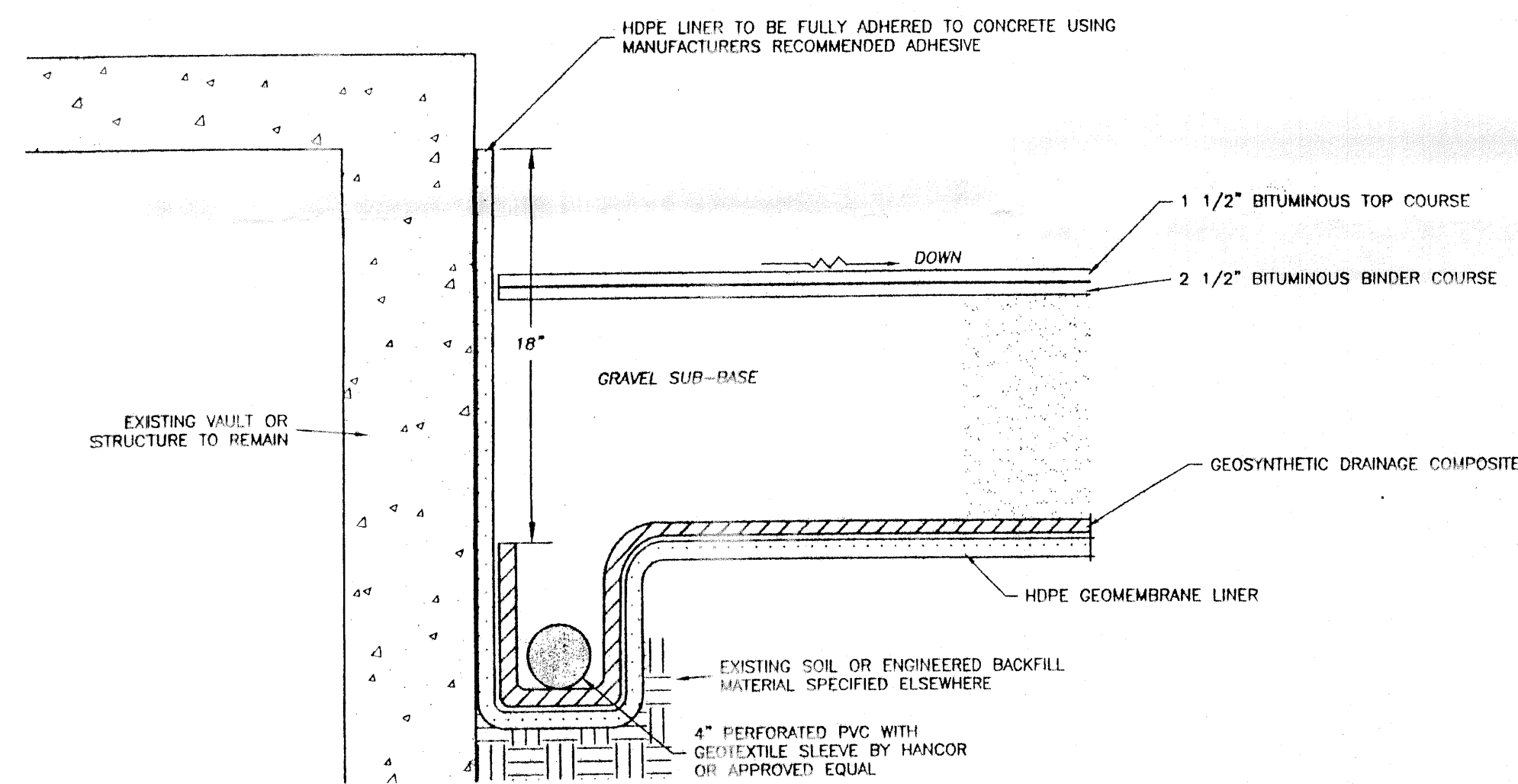
PAVEMENT RESTORATION DETAIL

N.T.S.



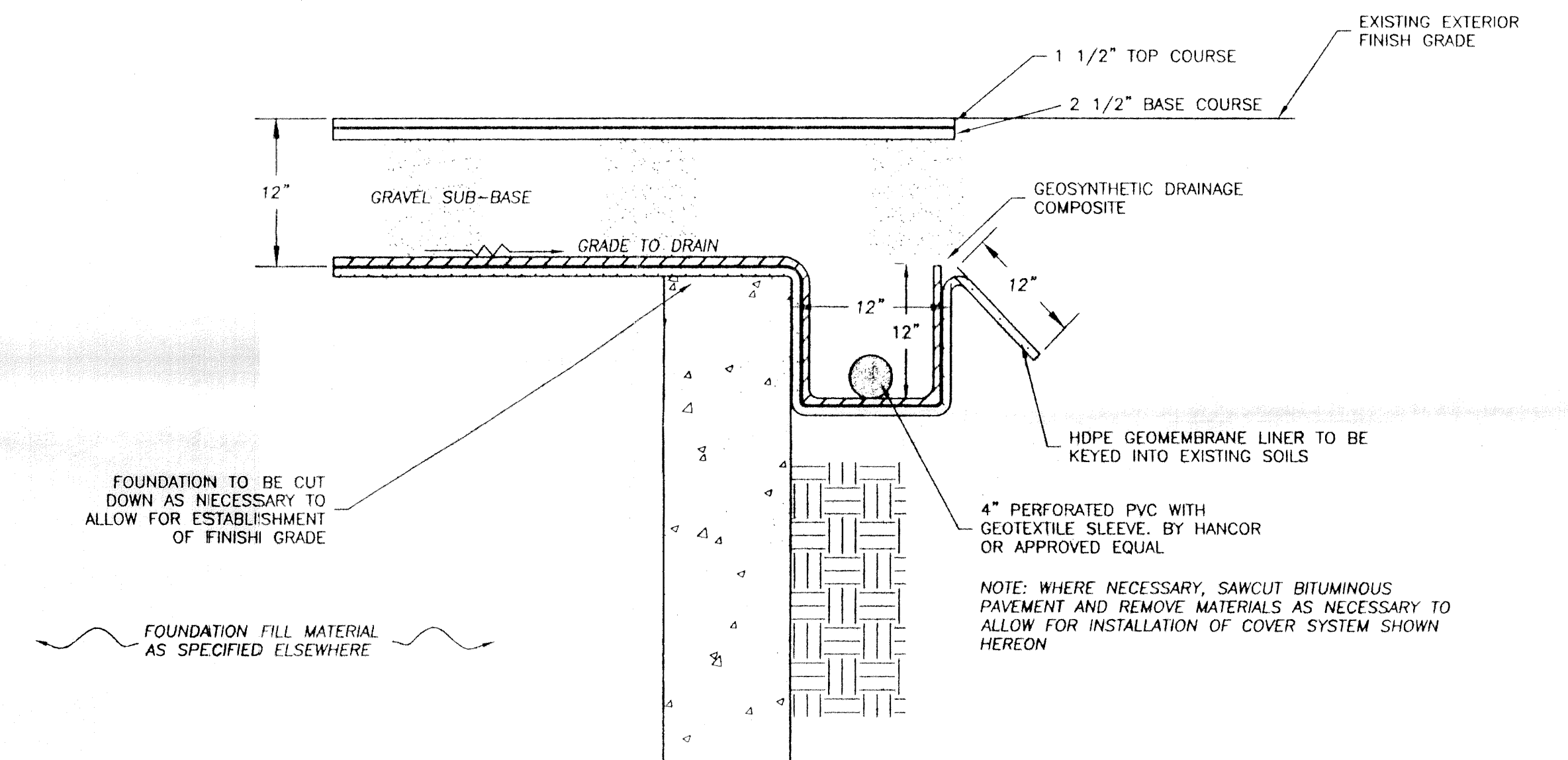
THRUST BLOCK DETAIL

N.T.S.



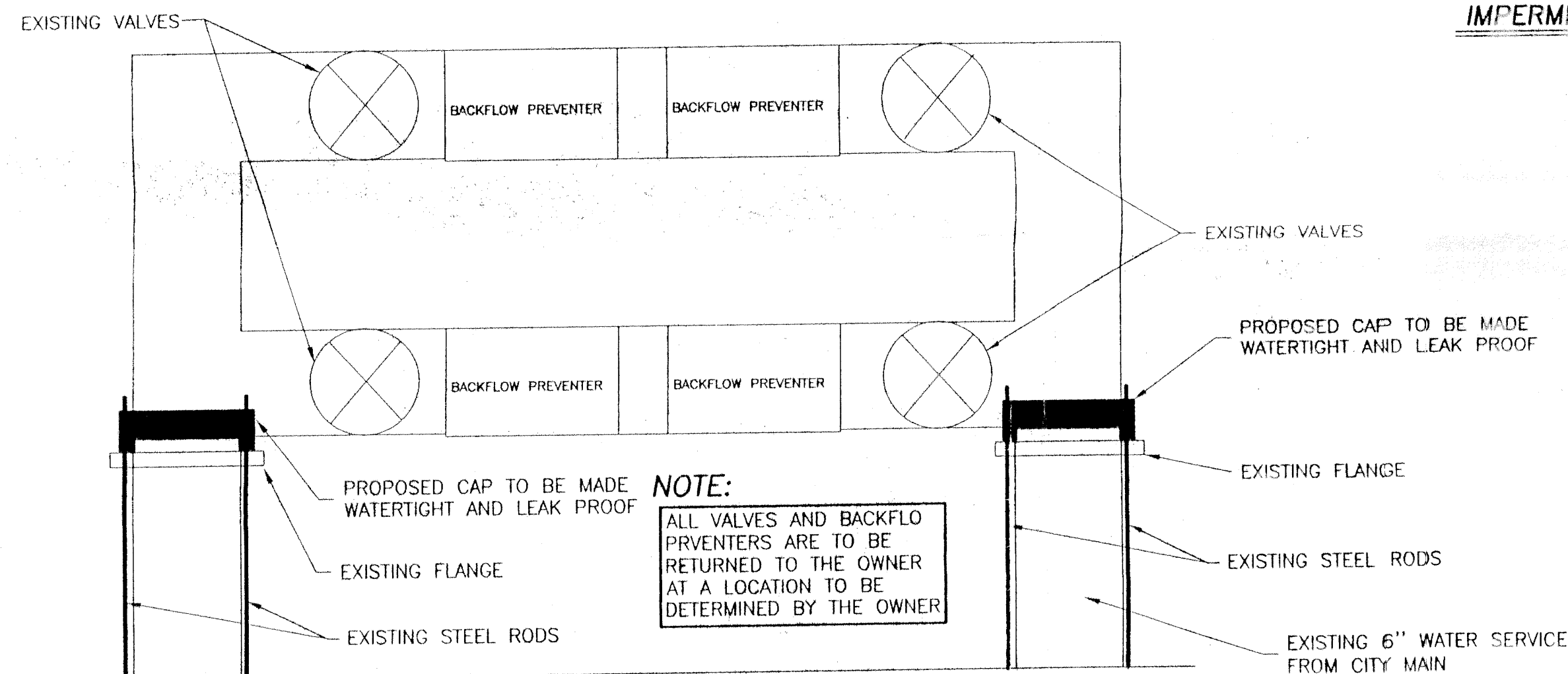
IMPERMEABLE ASPHALT COVER @ VAULT (TYPICAL)

N.T.S.



IMPERMEABLE ASPHALT COVER @ FOUNDATION WALL (TYPICAL)

N.T.S.



BUILDING 43A CAPPING DETAIL

N.T.S.

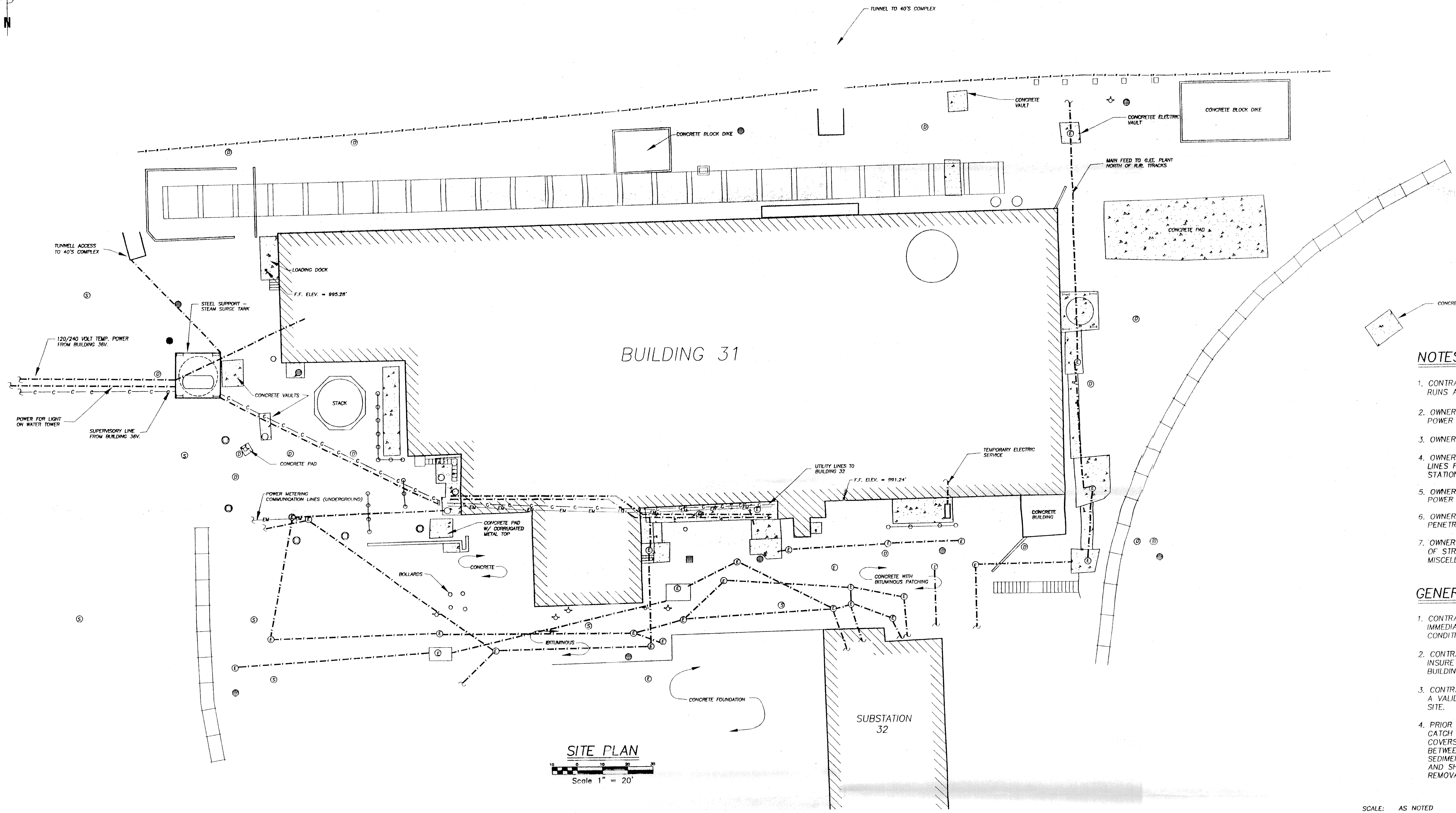
SCALE: AS NOTED

TITLE: BUILDING 31 DETAILS for GENERAL ELECTRIC			
GENERAL ELECTRIC		PITTSFIELD, MA	
1 INCORPORATE IMPERVIOUS CAP			
TMA		06/08/01	
WHITE ENGINEERING, INC. CIVIL AND ENVIRONMENTAL			
55 SOUTH MERRIAM STREET PITTSFIELD, MASSACHUSETTS 01201			
FAX (413) 443-8012		PHONE (413) 443-8011	
DATE: MARCH 6, 2001		CK'D: GE31-D2	
DR'N: JWC		AP'VD:	



LEGEND

- BOLLARD
- METAL PLATE
- ⊕ ABOVE GROUND VALVE
- ⊕ HYDRANT
- ⊕ SEWER MANHOLE
- ⊕ DRAINAGE MANHOLE
- ⊕ ELECTRIC MANHOLE
- ⊕ 2' DIAMETER CATCH BASIN
- ⊕ CAP - UNDETERMINED UTILITY
- ⊕ WATER MAIN UNDERGROUND VALVE
- MANHOLE - UNDETERMINED UTILITY
- ⊕ CONCRETE PIPE SUPPORT
- EXISTING ELECTRICAL LINE
- EXISTING TELEPHONE LINE
- EM ELECTRICAL METERING LINE
- C SUPERVISORY



NOTES:

1. CONTRACTOR TO PROTECT INTEGRITY OF DUCT RUNS AND VAULTS DURING DEMOLITION.
2. OWNER TO DISCONNECT TWO (2) TEMPORARY POWER LINES TO BUILDING.
3. OWNER TO RELOCATE TELEPHONE LINES.
4. OWNER TO RELOCATE SUPERVISORY COMMUNICATION LINES FOR CONDENSATE RECEIVING AND PUMPING STATION IN BUILDING 36V.
5. OWNER TO RELOCATE LIGHTS AND ASSOCIATED POWER FROM WATER TANK TOWER.
6. OWNER TO DISCONNECT AND REMOVE ALL CABLES PENETRATING BUILDING 31.
7. OWNER TO CLEAR NORTH AND WEST WALLS OF OF STRUC-1 OF ALL WIRE, WIRE SUPPORTS AND MISCELLANEOUS EQUIPMENT.

GENERAL NOTES:

1. CONTRACTOR TO NOTIFY ENGINEER OR OWNER IMMEDIATELY IN THE EVENT THAT ACTUAL FIELD CONDITIONS VARY FROM THOSE SHOWN HEREON.
2. CONTRACTOR TO TAKE NECESSARY MEASURES TO INSURE THAT EXISTING UTILITIES SERVING OTHER BUILDINGS REMAIN IN USE.
3. CONTRACTOR TO CONTACT DIG-SAFE AND HAVE A VALID NUMBER PRIOR TO ANY EXCAVATION ON-SITE.
4. PRIOR TO ANY DEMOLITION WORK, ALL EXISTING CATCH BASINS AND MANHOLES HAVING GRATED COVERS SHALL HAVE FILTER FABRIC INSTALLED BETWEEN THE FRAME AND COVER TO TRAP ALL SEDIMENT RESULTING FROM DEMOLITION ACTIVITIES AND SHALL BE MAINTAINED UNTIL DEEMED REMOVABLE BY THE OWNER.

SITE PLAN
Scale 1" = 20'

INFORMATION ON THIS DRAWING WAS COMPILED USING THE FOLLOWING AS REFERENCE:
 TOPOGRAPHICAL SURVEY PERFORMED BY WHITE ENGINEERING ON JULY 20, 21, 22, 1999
 BPL DWG - (4/87) GE ASSESSMENT OF PREFERENTIAL PATHWAYS UNDERGROUND ELECT. DUCTS FIGURE 2-8
 OWNER "FIELD VERIFIED DRAWING" OF ABOVE
 OWNER NOTED DISCREPANCIES
 WHITE ENGINEERING AND OWNER FIELD VISITS
 HILL ENGINEERING DRAWING - GE 923-8

SCALE: AS NOTED

TITLE: **GENERAL ELECTRIC BUILDING 31
EXISTING LOCATIONS OF
ELECTRICAL AND COMMUNICATION LINES**

WOODLAWN AVE. PITTSFIELD, MA

NO.	REVISION	BY	DATE

WHITE ENGINEERING, INC.
CIVIL AND ENVIRONMENTAL

55 SOUTH MERRIAM STREET
PITTSFIELD, MASSACHUSETTS 01201

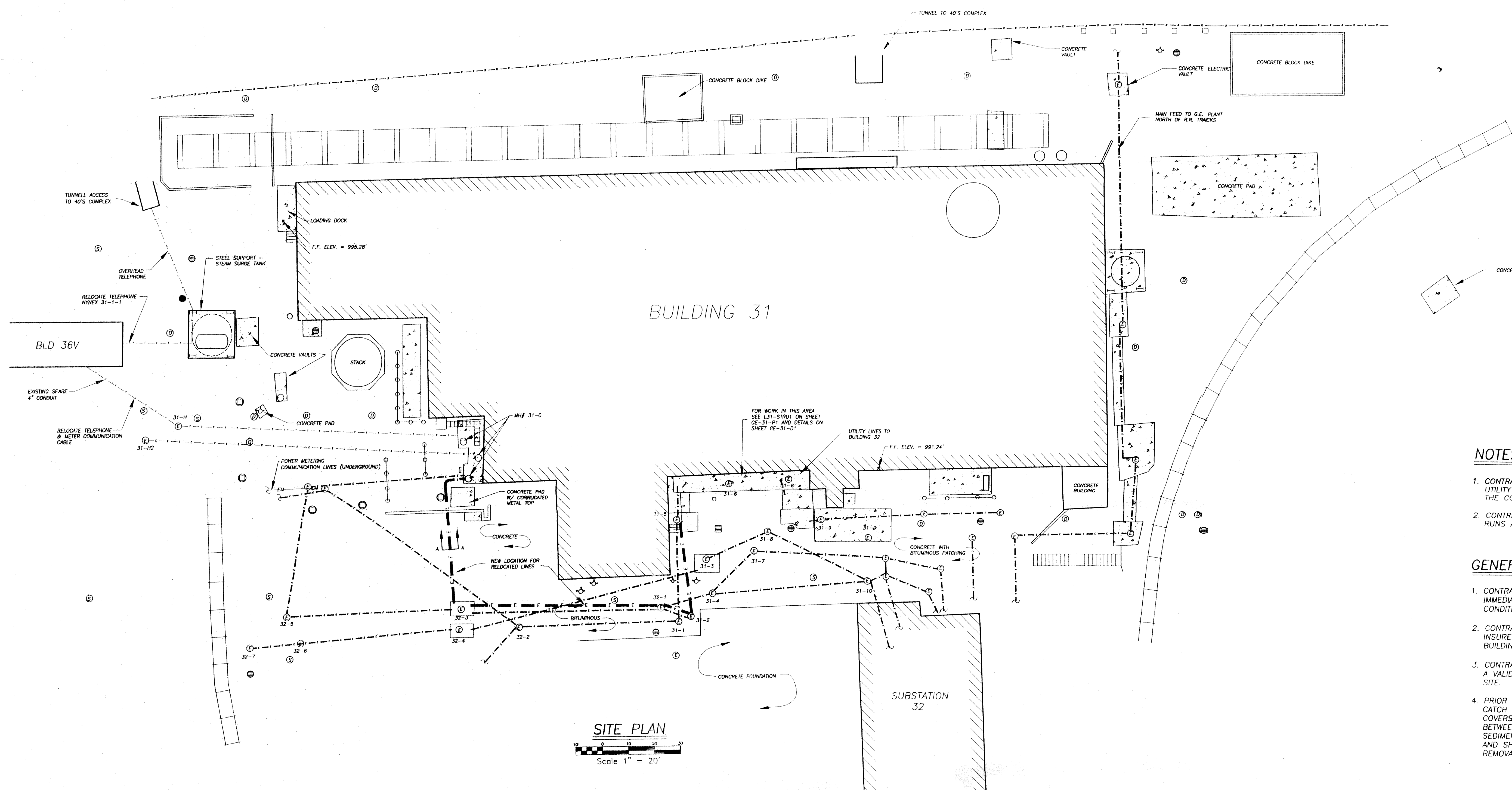
FAX (413) 443-8012 PHONE (413) 443-8011

DATE: MARCH 6, 2001 CK'D: AP'D: GE-31-E1

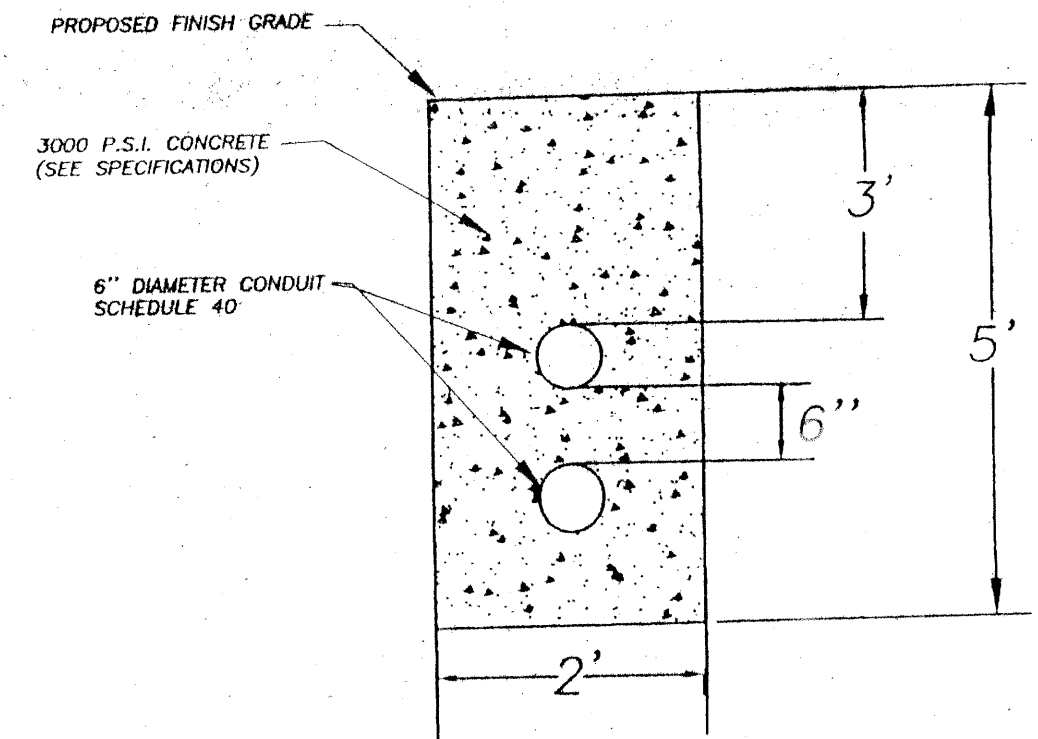
DRN: BCM & SNM

LEGEND

- BOLLARD
- METAL PLATE
- ⊕ ABOVE GROUND VALVE
- ◇ HYDRANT
- ⊙ SEWER MANHOLE
- ⊖ DRAINAGE MANHOLE
- ⊕ ELECTRIC MANHOLE
- ⊕ 2' DIAMETER CATCH BASIN
- ⊕ CAP - UNDETERMINED UTILITY
- ⊕ WATER MAIN UNDERGROUND VALVE
- MANHOLE - UNDETERMINED UTILITY
- ⊕ CONCRETE PIPE SUPPORT
- - - EXISTING ELECTRICAL LINE
- - - RELOCATED ELECTRICAL LINE
- - - EXISTING TELEPHONE LINE
- EM- ELECTRICAL METERING LINE
- C- SUPERVISORY



SITE PLAN
Scale 1" = 20'



SECTION AA
NTS

NOTES:

1. CONTRACTOR TO VERIFY THE LOCATION OF ALL UTILITY AND ASSOCIATED STRUCTURES PRIOR TO THE COMMENCEMENT OF DEMOLITION ACTIVITIES.
2. CONTRACTOR TO PROTECT INTEGRITY OF DUCT RUNS AND VAULTS DURING DEMOLITION.

GENERAL NOTES:

1. CONTRACTOR TO NOTIFY ENGINEER OR OWNER IMMEDIATELY IN THE EVENT THAT ACTUAL FIELD CONDITIONS VARY FROM THOSE SHOWN HEREON.
2. CONTRACTOR TO TAKE NECESSARY MEASURES TO INSURE THAT EXISTING UTILITIES SERVING OTHER BUILDINGS REMAIN IN USE.
3. CONTRACTOR TO CONTACT DIG-SAFE AND HAVE A VALID NUMBER PRIOR TO ANY EXCAVATION ON-SITE.
4. PRIOR TO ANY DEMOLITION WORK, ALL EXISTING CATCH BASINS AND MANHOLES HAVING GRATED COVERS SHALL HAVE FILTER FABRIC INSTALLED BETWEEN THE FRAME AND COVER TO TRAP ALL SEDIMENT RESULTING FROM DEMOLITION ACTIVITIES AND SHALL BE MAINTAINED UNTIL DEEMED REMOVABLE BY THE OWNER.

INFORMATION ON THIS DRAWING WAS COMPILED USING THE FOLLOWING AS REFERENCE:
 TOPOGRAPHICAL SURVEY PERFORMED BY WHITE ENGINEERING ON JULY 20, 21, 22, 1999
 EBL DWG - (4/67) GE ASSESSMENT OF PREFERENTIAL PATHWAYS UNDERGROUND ELECT. DUCTS FIGURE 2-6
 OWNER "FIELD VERIFIED DRAWING" OF ABOVE
 OWNER NOTED DRAWINGS
 WHITE ENGINEERING AND OWNER FIELD VISITS
 HILL ENGINEERING DRAWING - GE 923-8

SCALE: AS NOTED

TITLE: GENERAL ELECTRIC BUILDING 31 DEMOLITION LOCATIONS OF ELECTRICAL AND COMMUNICATION LINES

WOODLAWN AVE. PITTSFIELD, MA

NO.	REVISION	BY	DATE

WHITE ENGINEERING, INC.
 CIVIL AND ENVIRONMENTAL

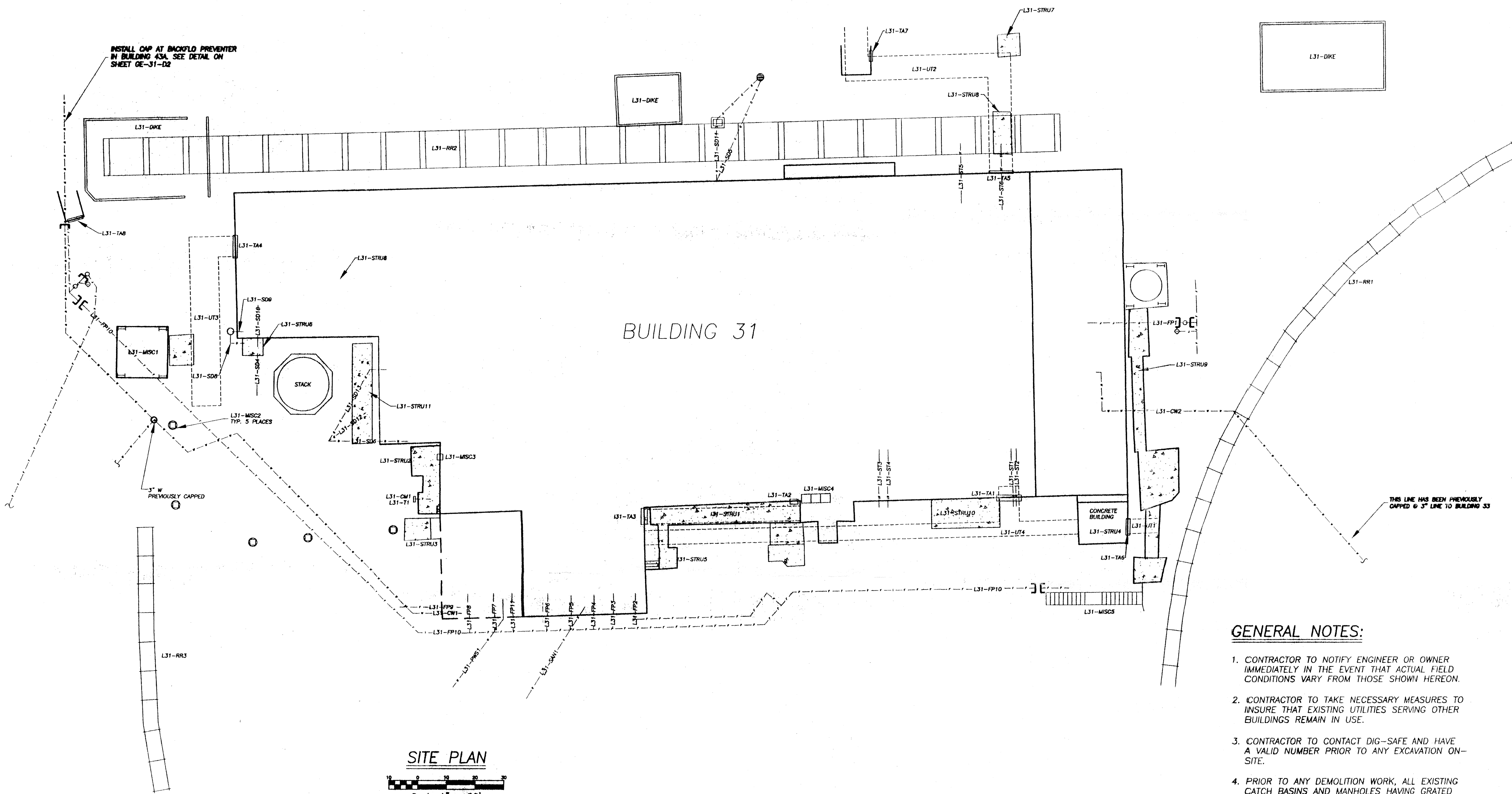
55 SOUTH MERRIAM STREET
 PITTSFIELD, MASSACHUSETTS 01201

FAX (413) 443-8012 PHONE (413) 443-8011
 DATE: MARCH 6, 2001 CK'D: _____
 DR'N: BCM & SNM AP'VD: _____

GE-31-E2

LEGEND

- BOLLARD
- ABOVE GROUND VALVE
- ⊕ HYDRANT
- ⊙ 2' DIAMETER CATCH BASIN
- ⊙ CONCRETE PIPE SUPPORT
- ⊙ CUT AND CAPPING LOCATION (APPROXIMATE)
- S— STEAM SYSTEM LINE
- D— DRAIN LINE
- F— FIRE PROTECTION LINE
- S— SEWER LINE
- T— TELEPHONE LINE
- W— WATER LINE
- L31-PP1 FIRE PROTECTION LINE ID (1-11)
- L31-CW1 CITY WATER LINE ID (1-2)
- L31-SAN1 SANITARY SEWER LINE ID (1 ONLY)
- L31-SD1 STORM DRAIN ID (1-14)
- L31-ST1 STEAM LINE ID (1-6)
- L31-T1 TELEPHONE LINE ID
- L31-CM1 COMMUNICATION LINE ID (1 ONLY)
- L31-PWS1 PROCESS WATER SUPPLY ID (1 ONLY)
- L31-STRU1 STRUCTURE ID (1-11)
- L31-TA1 TUNNEL ACCESS ID (1-8)
- L31-UT1 UNDERGROUND TUNNEL ID (1-4)
- L31-RR1 RAILROAD LINE ID (1-3)
- L31-MISC1 MISCELLANEOUS ITEM ID (1-5)
- L31-DKE DIKE (NO ID NUMBERS)



SITE PLAN
Scale 1" = 20'

GENERAL NOTES:

1. CONTRACTOR TO NOTIFY ENGINEER OR OWNER IMMEDIATELY IN THE EVENT THAT ACTUAL FIELD CONDITIONS VARY FROM THOSE SHOWN HEREON.
2. CONTRACTOR TO TAKE NECESSARY MEASURES TO INSURE THAT EXISTING UTILITIES SERVING OTHER BUILDINGS REMAIN IN USE.
3. CONTRACTOR TO CONTACT DIG-SAFE AND HAVE A VALID NUMBER PRIOR TO ANY EXCAVATION ON-SITE.
4. PRIOR TO ANY DEMOLITION WORK, ALL EXISTING CATCH BASINS AND MANHOLES HAVING GRATED COVERS SHALL HAVE FILTER FABRIC INSTALLED BETWEEN THE FRAME AND COVER TO TRAP ALL SEDIMENT RESULTING FROM DEMOLITION ACTIVITIES AND SHALL BE MAINTAINED UNTIL DEEMED REMOVABLE BY THE OWNER.
5. CONTRACTOR TO PROVIDE ACCURATE AS-BUILT LOCATION SKETCH OF INSTALLED UNDERGROUND CAPS. DIMENSIONS OF CAPS FROM AT LEAST TWO EXISTING PERMANENT STRUCTURES, TO BE PROVIDED.

NOTES:

1. THIS PLAN DEPICTS SELECT STRUCTURES AND UTILITIES ENTERING BUILDING 31. IT DOES NOT REPRESENT AN INVENTORY OF ALL PENETRATIONS.
2. CONTRACTOR TO NOTIFY AND COORDINATE WITH OWNER ALL ACTIVITIES REQUIRED TO WITNESS INTEGRITY OF CAPPED AND PRESSURIZED MUNICIPAL AND FIRE PROTECTION SUPPLY LINES.
3. CONTRACTOR TO NOTIFY AND COORDINATE WITH OWNER ALL ACTIVITIES REQUIRED TO ISOLATE, SHUTDOWN AND DRAIN ALL MUNICIPAL AND FIRE PROTECTION SUPPLY LINES.
4. SEE ASSOCIATED DRAWINGS FOR ADDITIONAL INFORMATION.
5. REFER TO SPECIFICATIONS ON REQUIREMENTS FOR EXCAVATION, LINE PRESSURE TESTING, BACKFILL, AND SURFACE PATCHING.
6. USE DETAIL SHEETS WITH THIS DRAWING.

INFORMATION ON THIS DRAWING WAS COMPILED USING THE FOLLOWING AS REFERENCE:
 BBL DWG - (5/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS STORM SEWER FIGURE 2-1
 BBL DWG - (3/86) GE ASSESSMENT OF PREFERENTIAL PATHWAYS SANITARY SEWER FIGURE 2-2
 BBL DWG - (3/86) GE ASSESSMENT OF PREFERENTIAL PATHWAYS MUNICIPAL WATER MAINS FIGURE 2-3
 BBL DWG - (3/86) GE ASSESSMENT OF PREFERENTIAL PATHWAYS (WATER MAINS) FIRE PROTECTION FIGURE 2-4
 BBL DWG - (3/86) GE ASSESSMENT OF PREFERENTIAL PATHWAYS NATURAL GAS MAINS FIGURE 2-5
 BBL DWG - (4/87) GE ASSESSMENT OF PREFERENTIAL PATHWAYS UNDERGROUND ELECT. DUCTS FIGURE 2-6
 BBL DWG - (4/86) GE ASSESSMENT OF PREFERENTIAL PATHWAYS UNDERGROUND TUNNELS FIGURE 2-7
 BBL DWG - (5/86) GE ASSESSMENT OF PREFERENTIAL PATHWAYS PROCESS AND PRODUCT LINES FIGURE 2-8
 BBL DWG - (5/86) GE ASSESSMENT OF PREFERENTIAL PATHWAYS OTHER PIPING NETWORKS FIGURE 2-9
 VARIOUS NOTED DRAWINGS FROM OWNER:
 G.E. WATER MAIN SHEET 2 OF 6 NO. 113-D-6082
 G.E. SKETCH NUMBER 25, MANHOLE 135, 137, 139.
 WHITE ENGINEERING AND OWNER FIELD VISITS.

SCALE: AS NOTED

**GENERAL ELECTRIC BUILDING 31
IDENTIFICATION OF
UTILITY CAPPING LOCATIONS AND
EXTERIOR STRUCTURES**

WOODLAWN AVE. PITTSFIELD, MA

NO.	REVISION	BY	DATE

WHITE ENGINEERING, INC.
CIVIL AND ENVIRONMENTAL

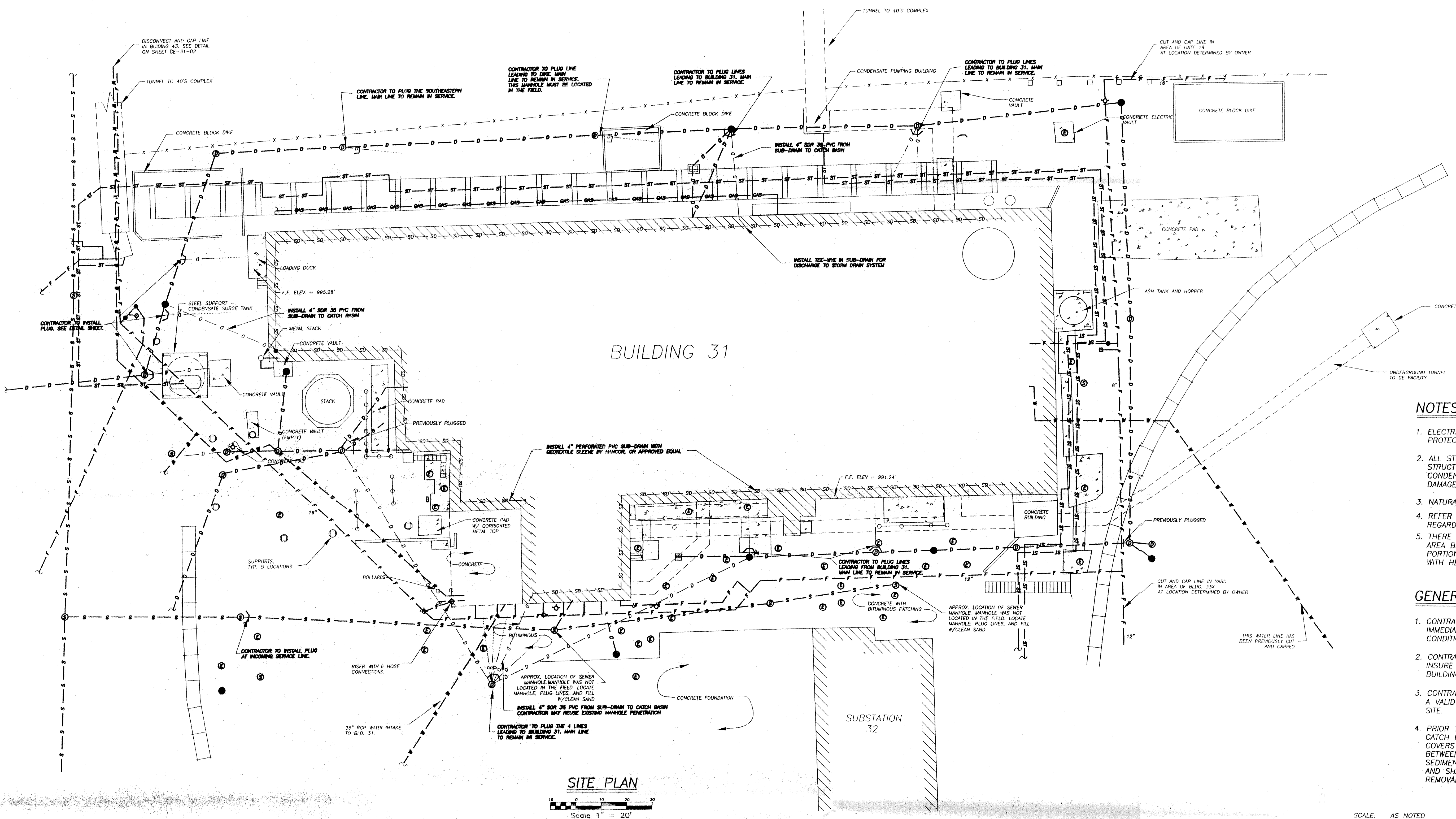
55 SOUTH MERRIAM STREET
PITTSFIELD, MASSACHUSETTS 01201

FAX (413) 443-8012 PHONE (413) 443-8011
 DATE: MARCH 6, 2001 CK'D: GE-31-P1
 DR'N: BCM & SNM AP'VD:



LEGEND

- BOLLARD
- ABOVE GROUND VALVE
- ◆ HYDRANT
- ⊙ SEWER MANHOLE
- ⊙ DRAINAGE MANHOLE
- ⊙ ELECTRIC MANHOLE
- 2' DIAMETER CATCH BASIN
- CAP - UNDETERMINED UTILITY
- ◆ WATER MAIN UNDERGROUND VALVE
- MANHOLE - UNDETERMINED UTILITY
- CONCRETE PIPE SUPPORT
- ST — STEAM SYSTEM LINE
- D — STORM DRAIN LINE
- E — ELECTRIC LINE
- F — FIRE PROTECTION LINE
- GAS — GAS LINE
- W — MUNICIPAL WATER LINE
- S — SEWER LINE
- T — TELEPHONE LINE
- (dashed) — APPROXIMATE PLUG LOCATION
- SD — PROPOSED SUB-DRAIN



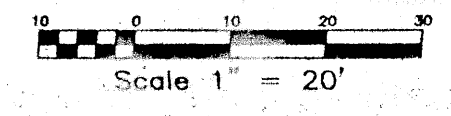
NOTES:

1. ELECTRICAL VAULTS AND DUCT RUNS TO BE PROTECTED FROM DAMAGE DURING DEMOLITION.
2. ALL STEAM SYSTEM LINES, ASSOCIATED EQUIPMENT, STRUCTURES, UNDERGROUND TUNNELS AND CONDENSATE SURGE TANK TO BE PROTECTED FROM DAMAGE DURING DEMOLITION.
3. NATURAL GAS LINE IS INACTIVE AND PARTIALLY REMOVED.
4. REFER TO DRAWING GE-31-E2 FOR INFORMATION REGARDING UNDERGROUND ELECTRIC LINES.
5. THERE ARE NUMEROUS ELECTRIC VAULTS IN THE AREA BETWEEN SUBSTATION 32 AND THE SOUTHEAST PORTION OF BUILDING 31. CAUTION SHOULD BE USED WITH HEAVY EQUIPMENT IN THIS AREA.

GENERAL NOTES:

1. CONTRACTOR TO NOTIFY ENGINEER OR OWNER IMMEDIATELY IN THE EVENT THAT ACTUAL FIELD CONDITIONS VARY FROM THOSE SHOWN HEREON.
2. CONTRACTOR TO TAKE NECESSARY MEASURES TO INSURE THAT EXISTING UTILITIES SERVING OTHER BUILDINGS REMAIN IN USE.
3. CONTRACTOR TO CONTACT DIG-SAFE AND HAVE A VALID NUMBER PRIOR TO ANY EXCAVATION ON-SITE.
4. PRIOR TO ANY DEMOLITION WORK, ALL EXISTING CATCH BASINS AND MANHOLES HAVING GRATED COVERS SHALL HAVE FILTER FABRIC INSTALLED BETWEEN THE FRAME AND COVER TO TRAP ALL SEDIMENT RESULTING FROM DEMOLITION ACTIVITIES AND SHALL BE MAINTAINED UNTIL DEEMED REMOVABLE BY THE OWNER.

SITE PLAN



INFORMATION ON THIS DRAWING WAS COMPILED USING THE FOLLOWING AS REFERENCE:

TOPOGRAPHICAL SURVEY PERFORMED BY WHITE ENGINEERING ON JULY 20, 21, 22, 1999

BBL DWG - (5/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS STORM SEWER FIGURE 2-1
 BBL DWG - (3/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS SANITARY SEWER FIGURE 2-2
 BBL DWG - (3/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS MUNICIPAL WATER MAINS FIGURE 2-3
 BBL DWG - (3/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS (WATER MAINS) FIRE PROTECTION FIGURE 2-4
 BBL DWG - (5/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS NATURAL GAS MAINS FIGURE 2-5
 BBL DWG - (4/67) GE ASSESSMENT OF PREFERENTIAL PATHWAYS UNDERGROUND ELECT. DUCTS FIGURE 2-6
 BBL DWG - (4/66) GE ASSESSMENT OF PREFERENTIAL PATHWAYS UNDERGROUND TUNNELS FIGURE 2-7
 BBL DWG - (5/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS PROCESS AND PRODUCT LINES FIGURE 2-8
 BBL DWG - (5/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS OTHER PIPING NETWORKS FIGURE 2-9

FIELD RESEARCH PERFORMED BY B&L, AUGUST, 1999
 INFORMATION PROVIDED BY OWNER

SCALE: AS NOTED

TITLE: **GENERAL ELECTRIC BUILDING 31
SITE PLAN OF
UNDERGROUND UTILITIES**

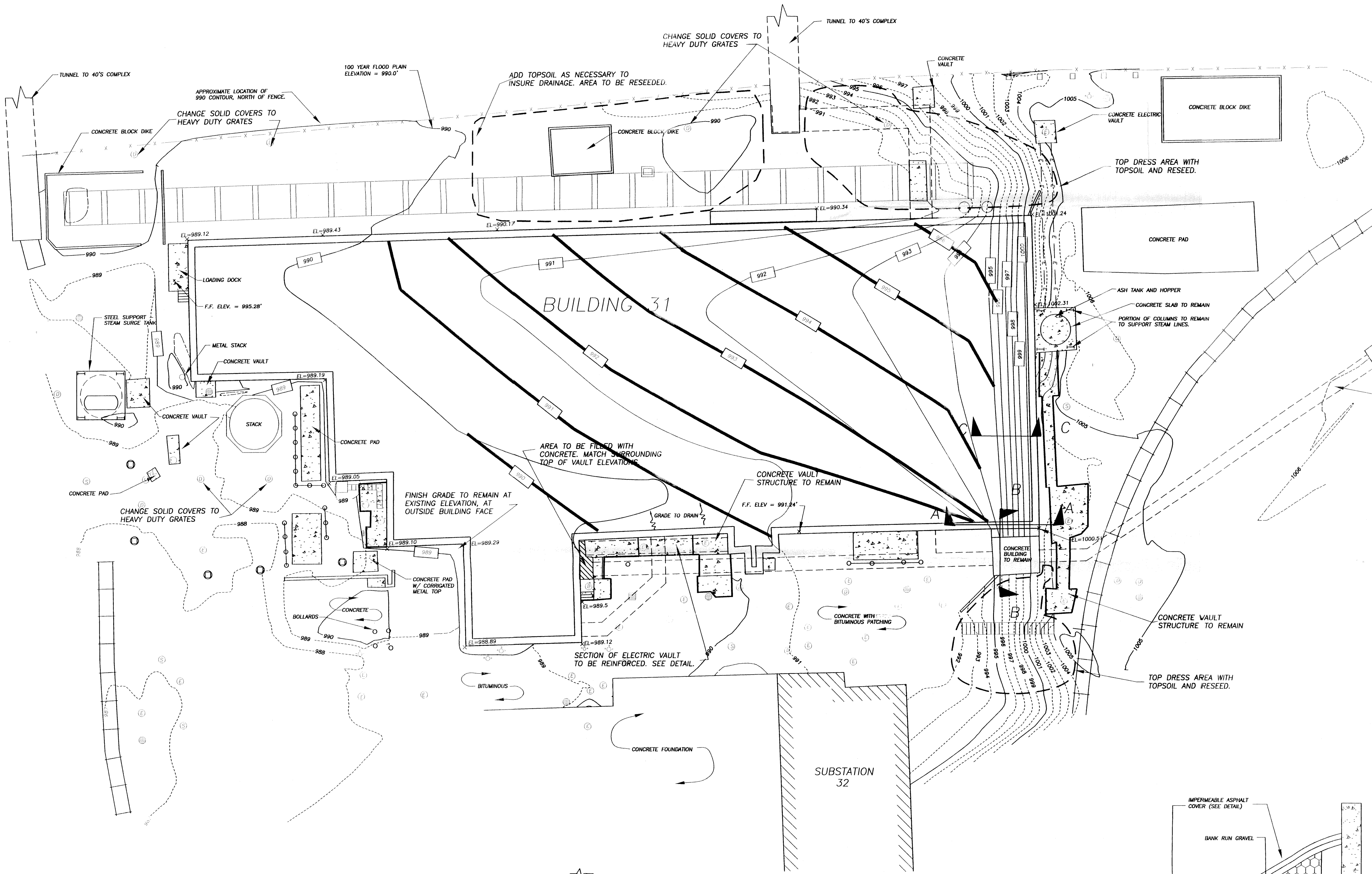
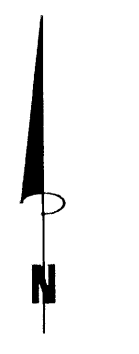
WOODLAWN AVE. PITTSFIELD, MA

1	INCORPORATE IMPERVIOUS CAP	TMA	06/08/01
		BY	DATE

WHITE ENGINEERING, INC.
 CIVIL AND ENVIRONMENTAL

55 SOUTH MERRIAM STREET
 PITTSFIELD, MASSACHUSETTS 01201

FAX (413) 443-8012 PHONE (413) 443-8011
 DATE: MARCH 6, 2001 CK'D:
 DRN: BCM & SNM AP'VD: **GE-31-S2**



- LEGEND**
- BOLLARD
 - ⊕ ABOVE GROUND VALVE
 - ⊕ HYDRANT
 - ⊕ SEWER MANHOLE
 - ⊕ DRAINAGE MANHOLE
 - ⊕ ELECTRIC MANHOLE
 - ⊕ 2' DIAMETER CATCH BASIN
 - CAP - UNDETERMINED UTILITY
 - WATER MAIN UNDERGROUND VALVE
 - MANHOLE - UNDETERMINED UTILITY
 - ⊕ CONCRETE PIPE SUPPORT
 - 100 YEAR FLOOD PLAN
 - PROPOSED CONTOUR ELEVATION
 - EXISTING CONTOUR ELEVATION
 - × EXISTING ELEVATION SPOT GRADE

NOTES:

CONTRACTOR TO NOTIFY ENGINEER OR OWNER IMMEDIATELY IN THE EVENT THAT ACTUAL FIELD CONDITIONS VARY FROM THOSE SHOWN HEREON.

CONTRACTOR TO TAKE NECESSARY MEASURES TO INSURE THAT EXISTING UTILITIES SERVING OTHER BUILDINGS REMAIN IN SERVICE.

CONTRACTOR TO CONTACT DIG-SAFE AND HAVE A VALID NUMBER PRIOR TO ANY EXCAVATION ON SITE.

PRIOR TO ANY DEMOLITION WORK, ALL EXISTING CATCHBASINS AND MANHOLES HAVING GRADED COVERS SHALL HAVE FILTER FABRIC INSTALLED BETWEEN THE FRAME AND COVER TO TRAP ALL SEDIMENT RESULTING FROM DEMOLITION ACTIVITIES, AND SHALL BE MAINTAINED UNTIL DEEMED REMOVABLE BY THE OWNER.

THIS DRAWING WAS COMPILED USING THE FOLLOWING DRAWINGS AS REFERENCES

TOPOGRAPHICAL SURVEY PERFORMED BY WHITE ENGINEERING ON JULY 20, 21, 22, 1999

BBL DWG - (5/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS STORM SEWER FIGURE 2-1

BBL DWG - (3/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS SANITARY SEWER FIGURE 2-2

BBL DWG - (3/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS MUNICIPAL WATER MAINS FIGURE 2-3

BBL DWG - (3/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS WATER MAINS FIRE PROTECTION FIGURE 2-4

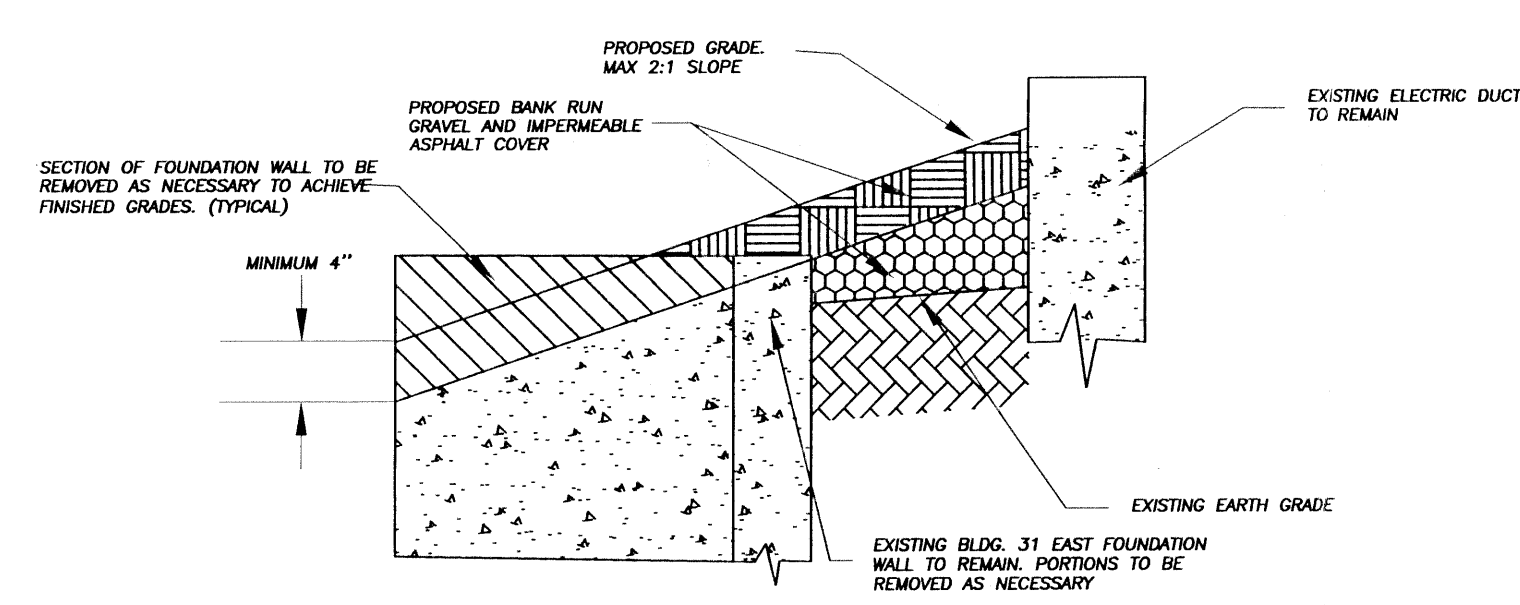
BBL DWG - (3/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS NATURAL GAS MAINS FIGURE 2-5

BBL DWG - (4/87) GE ASSESSMENT OF PREFERENTIAL PATHWAYS UNDERGROUND ELECT. DUCTS FIGURE 2-6

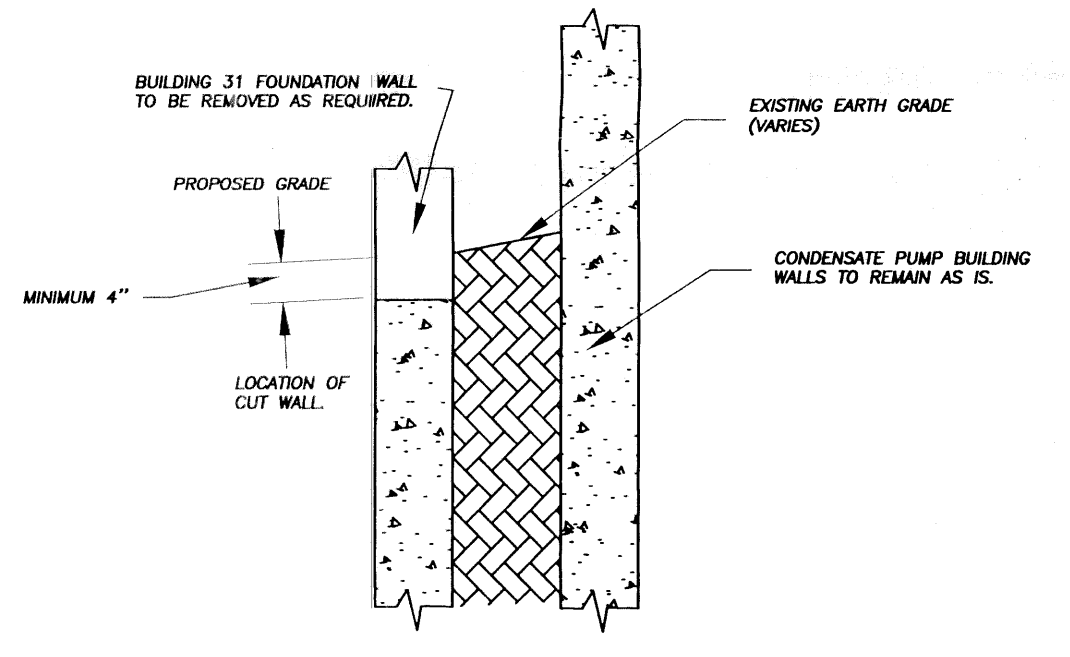
BBL DWG - (4/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS UNDERGROUND TUNNELS FIGURE 2-7

BBL DWG - (5/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS PROCESS AND PRODUCT LINES FIGURE 2-8

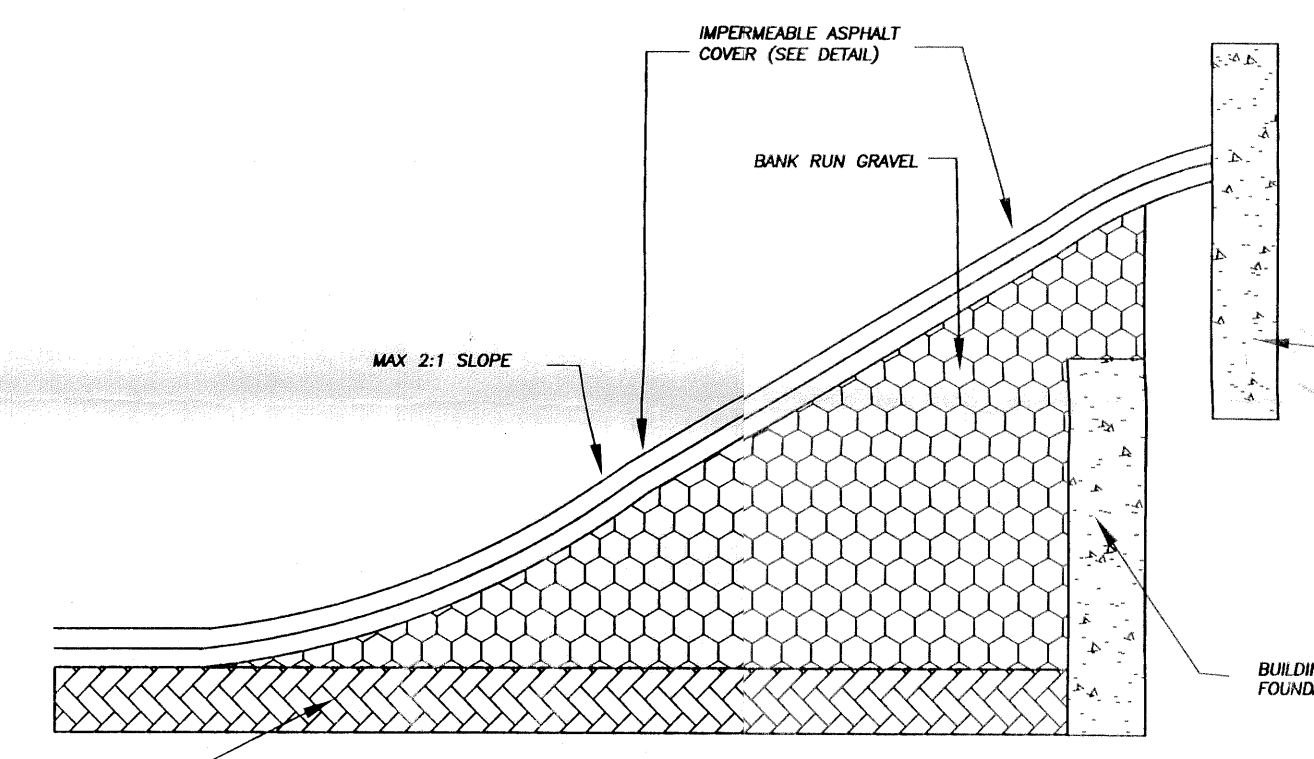
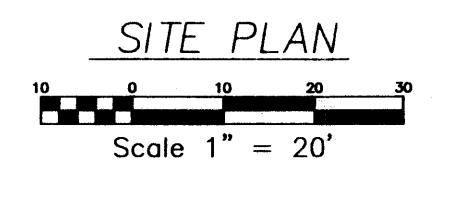
BBL DWG - (5/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS OTHER PIPING NETWORKS FIGURE 2-9



SECTION AA
N.T.S.



SECTION BB
N.T.S.



SECTION CC
N.T.S.

SCALE: AS NOTED

TITLE: **GENERAL ELECTRIC BUILDING 31**
FINAL SITE GRADING PLAN

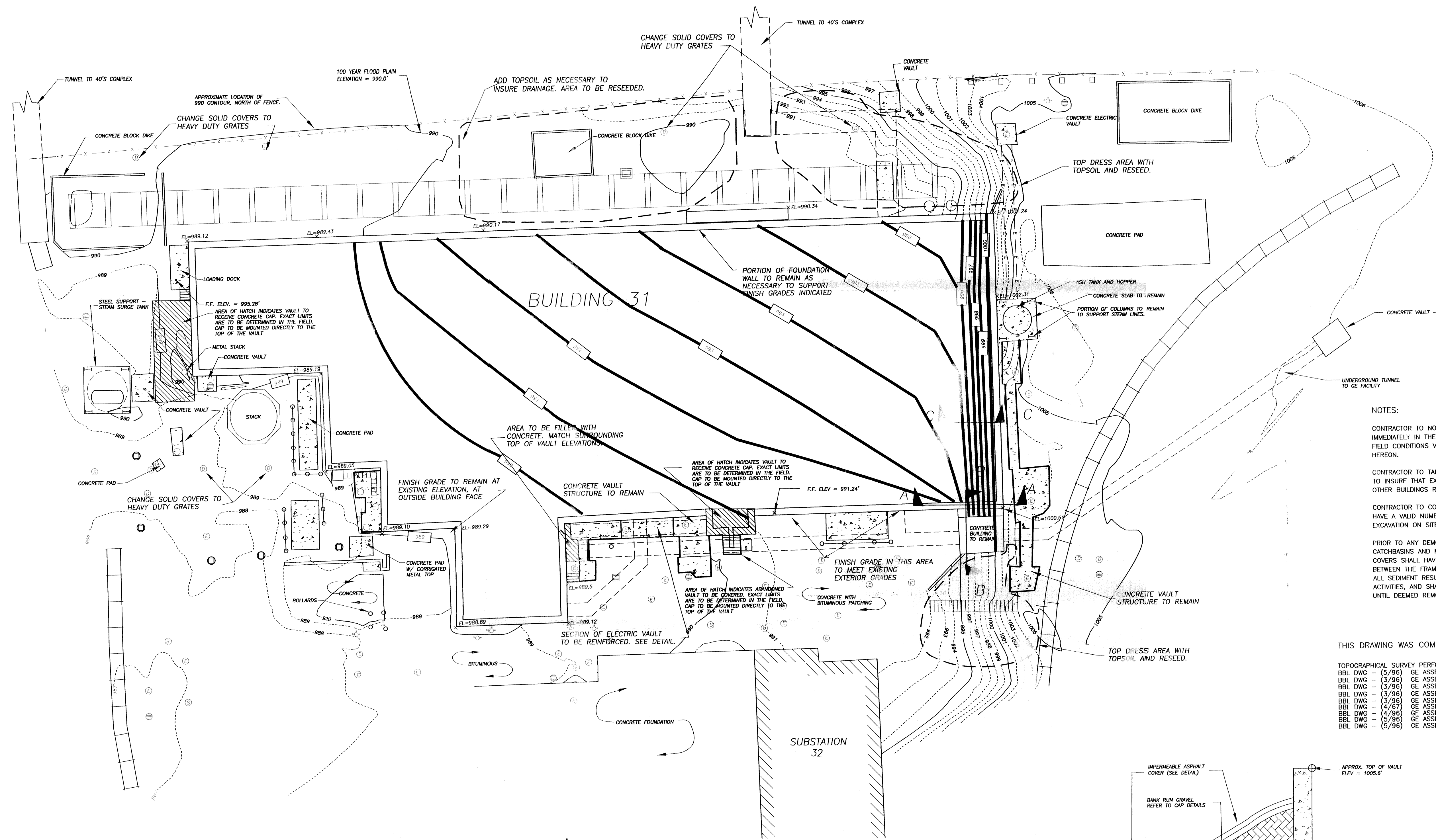
NO.	REVISION	DATE
2	MODIFY GRADING, MAINTAIN PORTION OF NORTH FND. WALL	MSK 05/07/02
1	INCORPORATE IMPERVIOUS CAP	TMA 06/08/01

PRIVILEGED AND CONFIDENTIAL, CREATED AT THE REQUEST OF COUNSEL.

WHITE ENGINEERING, INC.
CIVIL AND ENVIRONMENTAL

55 SOUTH MERRIAM STREET
PITTSFIELD, MASSACHUSETTS 01201

FAX (413) 443-8012 PHONE (413) 443-8011
DATE: MARCH 6, 2001 CK'D: AP'VD: **GE-31-S3.A**
DR'N: BCM & SNM



- LEGEND**
- BOLLARD
 - + ABOVE GROUND VALVE
 - HYDRANT
 - ⊕ SEWER MANHOLE
 - ⊕ DRAINAGE MANHOLE
 - ⊕ ELECTRIC MANHOLE
 - ⊕ 2' DIAMETER CATCH BASIN
 - CAP - UNDETERMINED UTILITY
 - WATER MAIN UNDERGROUND VALVE
 - MANHOLE - UNDETERMINED UTILITY
 - CONCRETE PIPE SUPPORT
 - 100 YEAR FLOOD PLAIN
 - PROPOSED CONTOUR ELEVATION
 - EXISTING CONTOUR ELEVATION
 - × EXISTING ELEVATION SPOT GRADE

NOTES:

CONTRACTOR TO NOTIFY ENGINEER OR OWNER IMMEDIATELY IN THE EVENT THAT ACTUAL FIELD CONDITIONS VARY FROM THOSE SHOWN HEREON.

CONTRACTOR TO TAKE NECESSARY MEASURES TO INSURE THAT EXISTING UTILITIES SERVING OTHER BUILDINGS REMAIN IN SERVICE.

CONTRACTOR TO CONTACT DIG-SAFE AND HAVE A VALID NUMBER PRIOR TO ANY EXCAVATION ON SITE.

PRIOR TO ANY DEMOLITION WORK, ALL EXISTING CATCHBASINS AND MANHOLES HAVING GRATED COVERS SHALL HAVE FILTER FABRIC INSTALLED BETWEEN THE FRAME AND COVER TO TRAP ALL SEDIMENT RESULTING FROM DEMOLITION ACTIVITIES, AND SHALL BE MAINTAINED UNTIL DEEMED REMOVABLE BY THE OWNER.

THIS DRAWING WAS COMPILED USING THE FOLLOWING DRAWINGS AS REFERENCES

TOPOGRAPHICAL SURVEY PERFORMED BY WHITE ENGINEERING ON JULY 20, 21, 22, 1999

BBL DWG - (5/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS STORM SEWER FIGURE 2-1

BBL DWG - (3/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS SANITARY SEWER FIGURE 2-2

DBL DWG - (1/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS MUNICIPAL WATER MAINS FIGURE 2-3

BBL DWG - (3/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS (WATER MAINS) FIRE PROTECTION FIGURE 2-4

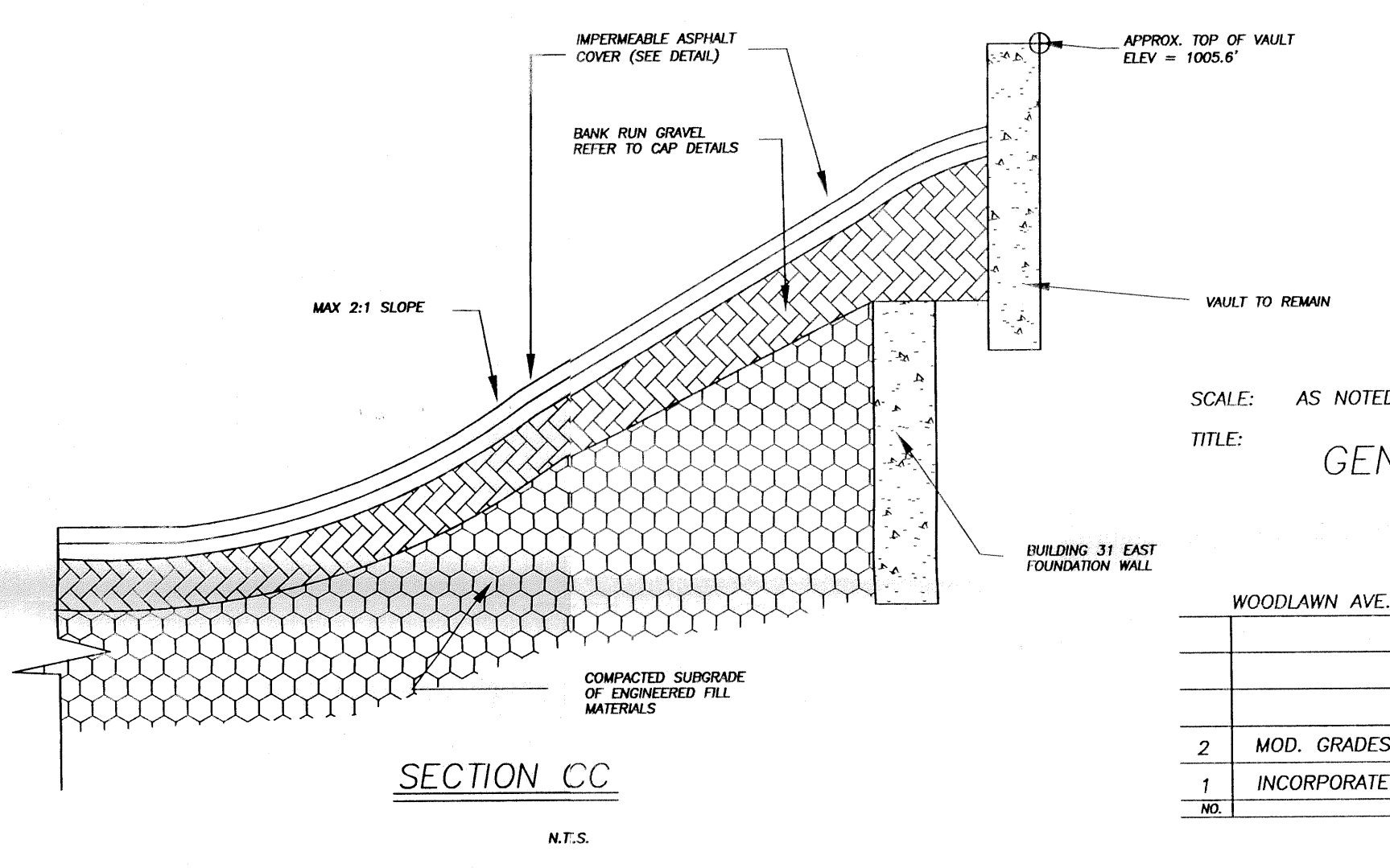
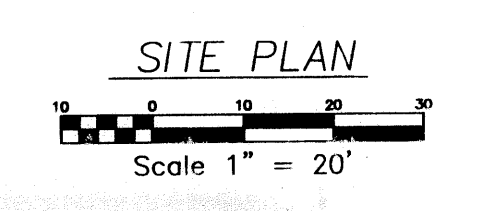
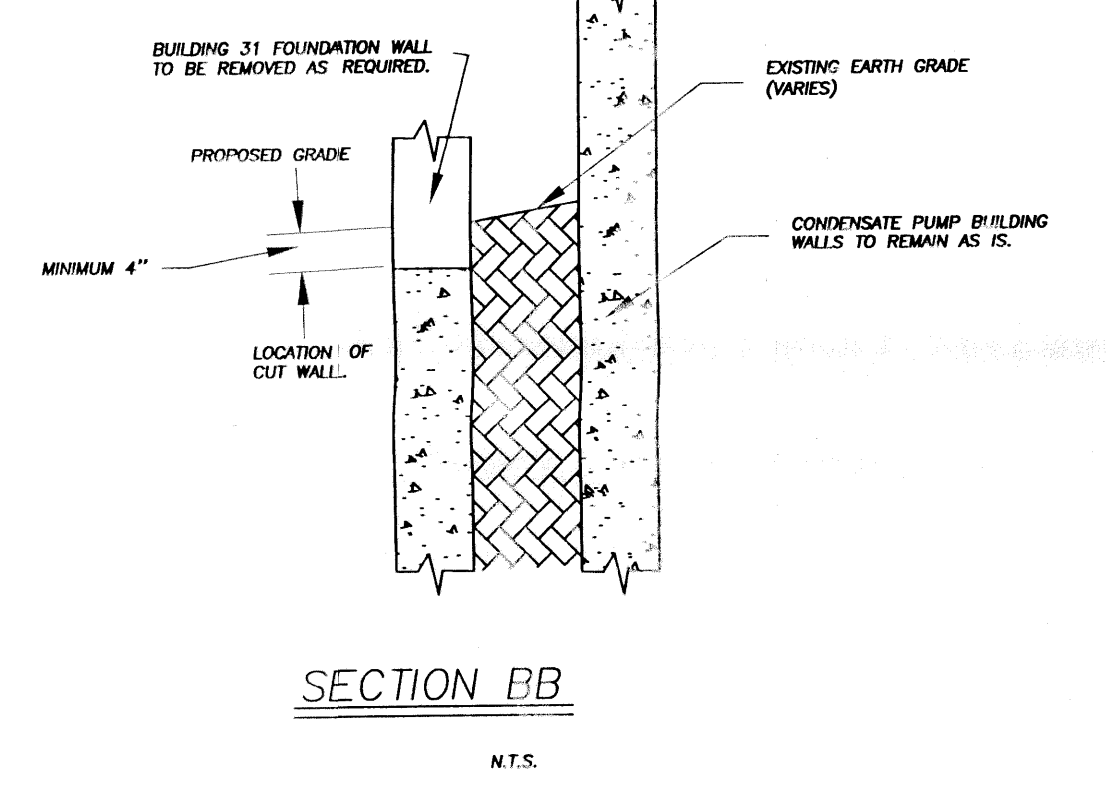
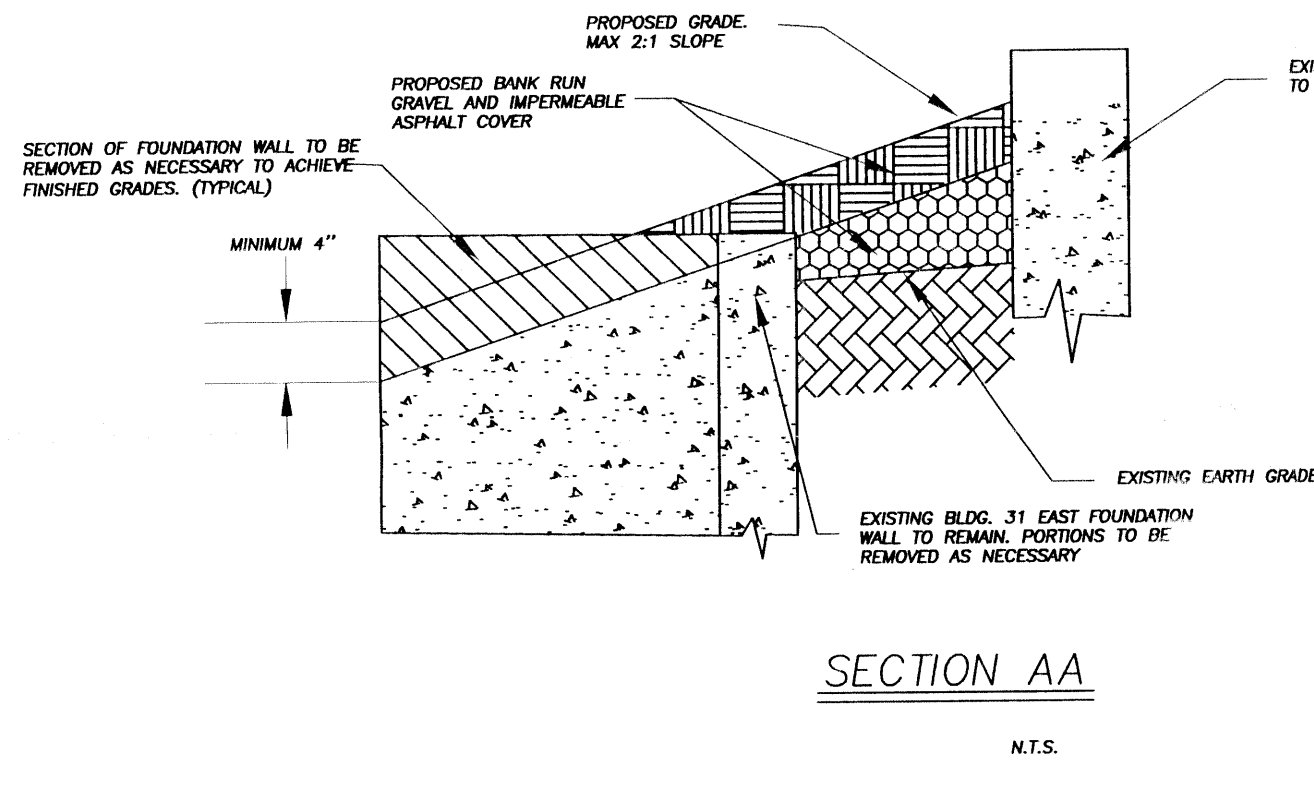
BBL DWG - (3/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS NATURAL GAS MAINS FIGURE 2-5

BBL DWG - (4/97) GE ASSESSMENT OF PREFERENTIAL PATHWAYS UNDERGROUND ELECT. DUCTS FIGURE 2-6

BBL DWG - (4/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS UNDERGROUND TUNNELS FIGURE 2-7

BBL DWG - (5/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS PROCESS AND PRODUCT LINES FIGURE 2-8

BBL DWG - (5/96) GE ASSESSMENT OF PREFERENTIAL PATHWAYS OTHER PIPING NETWORKS FIGURE 2-9



SCALE: AS NOTED

TITLE: **GENERAL ELECTRIC BUILDING 31**
FINAL SITE GRADING PLAN

WOODLAWN AVE.		PITTSFIELD, MA	
2	MOD. GRADES, ADDL CONC. CAPS	MSK	05/16/02
1	INCORPORATE IMPERVIOUS CAP	TMA	06/08/01
NO.		REVISION	BY DATE

WHITE ENGINEERING, INC.
CIVIL AND ENVIRONMENTAL

55 SOUTH MERRIAM STREET
PITTSFIELD, MASSACHUSETTS 01201

FAX (413) 443-8012 PHONE (413) 443-8011
DATE: MARCH 6, 2001 CK'D: GE-31-S3.B
DR'N: BCM & SNM AP'VD:

Attachment B

Project Photographs



LEGEND:

----- Approximate Removal
Action Area Boundary

NOT-TO-SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
FINAL COMPLETION REPORT FOR 30s COMPLEX

**MAY 2001 AERIAL PHOTOGRAPH
(LOOKING NORTHEAST)**

BBL[®]
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
B-1



LEGEND:

----- Approximate Removal
Action Area Boundary

NOT-TO-SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
FINAL COMPLETION REPORT FOR 30s COMPLEX

**MAY 2001 AERIAL PHOTOGRAPH
(LOOKING NORTHEAST)**

BBL[®]
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
B-2



LEGEND:

----- Approximate Removal
Action Area Boundary

NOT-TO-SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
FINAL COMPLETION REPORT FOR 30s COMPLEX

**MAY 2001 AERIAL PHOTOGRAPH
(LOOKING WEST)**

BBL[®]
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
B-3



GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
FINAL COMPLETION REPORT FOR 30s COMPLEX

**GENERAL SITE CONDITIONS -
FEBRUARY 15, 2005 (LOOKING SOUTHWEST
FROM WOODLAWN AVENUE BRIDGE)**

BBL[®]
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
B-4



(Looking East)



(Looking West)

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
FINAL COMPLETION REPORT FOR 30s COMPLEX
FORMER BUILDING 31 POWERHOUSE -
FEBRUARY 15, 2005
BUILDING DEMOLITION BARRIER AREA



FIGURE
B-5



GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
FINAL COMPLETION REPORT FOR 30s COMPLEX

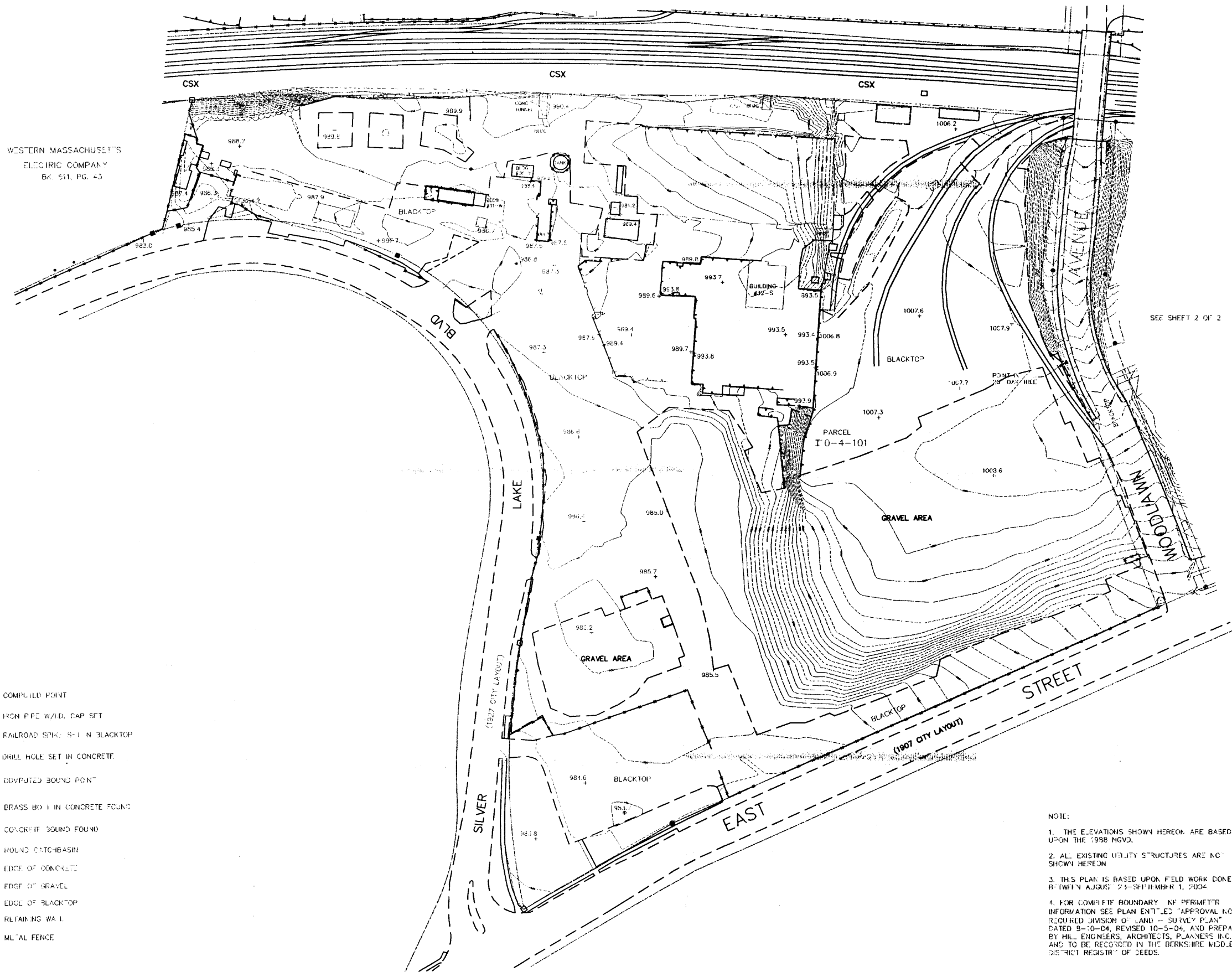
**BUILDING 33/34 AREA -
FEBRUARY 15, 2005
(PANARAMIC VIEW WEST TO NORTH)**

BBL[®]
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
B-6

Attachment C

Topographic Survey Map and Plan of Restricted Areas Map



WESTERN MASSACHUSETTS
ELECTRIC COMPANY
BK. 511, PG. 43

SEE SHEET 2 OF 2

LEGEND

- ▲ COMPILED POINT
- IRON PIPE W/ID. CAP SET
- ⦿ RAILROAD SPIKE SET IN BLACKTOP
- ⊕ DRILL HOLE SET IN CONCRETE
- COMPUTED BOUND POINT
- ⊙ BRASS BOLL IN CONCRETE FOUND
- ⊔ CONCRETE BOUND FOUND
- ROUND CATCHBASIN
- EDGE OF CONCRETE
- - - - EDGE OF GRAVEL
- - - - EDGE OF BLACKTOP
- - - - RETAINING WALL
- - - - METAL FENCE

NOTE:
 1. THE ELEVATIONS SHOWN HEREON ARE BASED UPON THE 1988 NGVD.
 2. ALL EXISTING UTILITY STRUCTURES ARE NOT SHOWN HEREON.
 3. THIS PLAN IS BASED UPON FIELD WORK DONE BETWEEN AUGUST 23-25TH 11:00 AM TO 1:00 PM, 2004.
 4. FOR COMPLETE BOUNDARY AND PERMITTER INFORMATION SEE PLAN ENTITLED "APPROVAL NOT REQUIRED DIVISION OF LAND - SURVEY PLAN" DATED 9-10-04, REVISED 10-5-04, AND PREPARED BY HILL ENGINEERS, ARCHITECTS, PLANNERS INC. AND TO BE RECORDED IN THE BERKSHIRE MIDDLE DISTRICT REGISTRY OF DEEDS.

REV.	DESCRIPTION	DATE
A	REVISE CONTOURS	10-24-04

GENERAL ELECTRIC COMPANY 100 WOODLAWN AVE. PITTSFIELD, MASS		DRAWING TITLE TOPOGRAPHIC SURVEY
PROJECT DESCRIPTION 30'S COMPLEX		

DRAWN BY	SJT
DATE DRAWN	9/07/04
SCALE	1"=60'
APVD BY	
CAD CODE	
GE-1085-1/UMG/CL-1085-1/DWG	
DRAWING NUMBER	REV.
GE-1085-7	A

