01-0530

SDMS 39445

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

Transmitted Via Overnight Delivery

December 20, 2002

Mr. Bryan Olson
EPA Project Coordinator
U.S. Environmental Protection Agency, Region I
One Congress Street, Mail Code HBT
Boston, MA 02203-2201

Re: **GE-Pittsfield/Housatonic River Site**
30s Complex (GECD120)
Proposal for Supplemental Soil Investigations – Building 33/34 Area

Dear Mr. Olson:

This letter describes the investigations proposed by the General Electric Company (GE) to further characterize building materials and underlying soils associated with Buildings 33, 33-A, 33-E, 33-X, and 34 (the Building 33/34 Area) at GE's Pittsfield, Massachusetts facility (Figure 1). The investigations proposed herein have been identified based on recent discussions among GE, the U.S. Environmental Protection Agency (EPA), and the Pittsfield Economic Development Authority (PEDA) related to the future development of GE's 30s Complex, which includes the Building 33/34 Area. Specifically, following demolition of these buildings, this portion of the GE facility will be transferred to PEDA pursuant to the Definitive Economic Development Agreement (DEDA).

To facilitate PEDA's future planning and re-development of the Building 33/34 Area, GE has recently agreed to perform additional soil and building characterization activities to supplement the results of investigations previously conducted in this area. For the existing soils beneath the Building 33/34 Area, the primary objective of the investigations proposed herein is to determine the need for any soil-related response actions based on the Performance Standards established in the October 2000 Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site. For the building materials, the proposed activities are intended to assist in assessing whether and to what extent the building demolition debris may be used as backfill/grading materials both within the Building 33/34 Area and possibly (subject to a future proposal) at other locations within the GE facility.

Additional information concerning the prior investigations conducted at the Building 33/34 Area and GE's proposal and schedule for supplemental soil and building investigations are presented below.

A. Background Information

Over the last few years, GE has conducted soil and building characterization activities at the Building 33/34 Area. These activities, summarized below, serve as the basis for the supplemental investigation proposals presented in Part B of this letter.

Pre-Design Soil Investigations

Between November 2000 and January 2001, GE conducted pre-design soil investigations for the 30s Complex Removal Action Area (RAA) to assess the presence of polychlorinated biphenyls (PCBs) and non-PCB constituents listed in Appendix IX of 40 CFR 264, plus 2-chloroethyl vinyl ether, benzidine, and 1,2-diphenylhydrazine (Appendix IX+3) in soils. These pre-design soil investigations were performed consistent with the requirements established for such sampling in the *Statement of Work for Removal Actions Outside the River* (SOW) (Appendix E to the CD). Specific to the Building 33/34 Area, the scope of the completed pre-design investigations considered the anticipated site conditions following demolition of the existing buildings, as described below.

As part of the DEDA, GE will demolish the above-grade portions of several buildings within the GE facility prior to GE's transfer of select property to PEDA. While the building demolition activities themselves are not subject to the requirements of the CD and SOW, the soils that remain beneath building floor slabs following demolition are subject to the CD and SOW. For the pre-design investigations and subsequent RD/RA evaluations already completed by GE, the Building 33/34 Area was considered to be a future paved area, and therefore subject to sampling at a frequency of approximately two locations per acre, as required by the SOW. However, the actual scope of the pre-design investigations for this area was expanded, as GE elected to advance at least one boring per building, while PEDA elected to fund additional sampling beyond that required by the SOW, and such sampling was performed by GE. The existing pre-design soil sampling locations are shown on Figure 2.

In December 2001, GE submitted a *Conceptual Removal Design/Removal Action Work Plan for the 20s, 30s, and 40s Complexes*. That report was subsequently amended and supplemented by three documents: (1) a February 7, 2002 submittal presenting revised PCB spatial averaging tables; (2) a February 15, 2002 Addendum to the December 2001 Work Plan; and (3) a March 4, 2002 submittal presenting a revised risk evaluation of non-PCB constituents. The December 2001 Work Plan and these subsequent documents (collectively referred to herein as the "Conceptual Work Plan") demonstrated, based on review of all the soil data, that the average concentrations of both PCBs and other constituents (as well as the maximum concentrations of polychlorinated dibenzo-p-dioxin and polychlorinated dibenzofuran [PCDD/PCDF] Toxicity Equivalency Quotients [TEQs]) in soils at the 30s Complex were well below the applicable Performance Standards in the CD and SOW, and that thus no further soil-related response actions were necessary in that area. EPA conditionally approved the Conceptual Work Plan by a letter of March 19, 2002, indicating agreement with the conclusion that no further response actions were required in the 30s Complex.

Previous Building Characterization Activities

To support the design and development of a demolition plan for the Building 33/34 Area and to evaluate potential options for disposition of the building demolition debris, GE conducted a building characterization program between September 8 and 15, 1999. That program involved the collection, for PCB analysis, of concrete floor, concrete block, and brick samples from 73 locations. The results of that

sampling effort, summarized in a letter to EPA dated September 27, 2001 (copy included in Attachment A to this letter), indicated that the majority of the samples contained either non-detectable PCBs or PCB levels less than 1 ppm, while only four of the 73 samples contained PCB levels above 25 ppm. In addition, as part of the sampling activities described above, six composite samples of brick or concrete floor were submitted for analysis of RCRA hazardous waste characteristics -- i.e., ignitability, reactivity, corrosivity, and toxicity using the toxicity characteristic leaching procedure (TCLP). TCLP extract samples were analyzed for volatile organic compounds (VOC), semi-volatile organic compounds (SVOC), and metals. The sampling results from this phase of the characterization program, which were provided to EPA in a letter dated October 30, 2001 (copy included in Attachment B), demonstrated that the building materials are not RCRA hazardous waste and are therefore suitable for consolidation at GE's Hill 78 On-Plant Consolidation Area (OPCA) under the CD and SOW.

Based on a review of the building characterization data, EPA approved the consolidation of the Building 33/34 Area demolition debris at the Hill 78 OPCA, subject to the conditions set forth in the CD and SOW regarding OPCA consolidation activities. EPA approval was provided to GE in a letter dated November 14, 2001.

B. Proposed Supplemental Characterization Activities

Since completion of the activities described in the preceding section, GE and PEDA have discussed the possible removal of the Building 33/34 Area floor slabs and building foundations as part of the building demolition activities. Specifically, GE and PEDA have discussed -- for the Building 33/34 Area only – an alternative approach involving the removal of the existing floor slabs and underlying building footings/foundations to a depth of approximately one foot below the final grade, and replacing the removed materials with either crushed/processed building demolition debris or other suitable fill material. GE and PEDA have also discussed using crushed/processed building demolition debris to re-contour the Building 33/34 Area, both within and outside the footprints of the current buildings, as well as for regrading of other areas to be transferred to PEDA under the DEDA.

To further assess these potential activities, GE has identified additional characterization activities for the soil beneath the Building 33/34 Area and for the building materials themselves. A description of the proposed activities is presented below.

Supplemental Soil Investigations

To determine the scope of additional investigations for the soils beneath the Building 33/34 Area, GE has assumed that this area will or may be unpaved following the completion of building demolition activities. Based on this assumption, GE has identified additional soil sampling activities consistent with the grid-based requirements specified in the SOW for unpaved areas within the GE Plant Area, and has compared the currently available pre-design sampling data to these requirements.

As described in Section 2.2.3 of the SOW, pre-design soil investigations of unpaved areas within the GE Plant Area generally involve the collection of soil samples on an approximate 100-foot sampling grid. At each grid node, samples are to be collected at depth increments of 0 to 1 foot, 1 to 6 feet, and 6 to 15 feet below grade and analyzed for PCBs. In addition, soils from approximately one-third of those sample locations are subject to analysis for the non-PCB Appendix IX+3 constituents, with the distribution of these samples to be approximately evenly distributed between the surface soil sample increment (0 to 1

foot) and the deeper depth increments. (For this RAA, EPA has agreed that the analyses for Appendix IX+3 constituents need not include pesticides and herbicides.)

To determine the scope of supplemental investigations at the Building 33/34 Area (assuming that it will be an unpaved area in the future), GE first extended the 100-foot sampling grid previously used for the pre-design investigations conducted elsewhere within the RAA to include the Building 33/34 Area (Figure 2). Without taking into consideration the existing pre-design investigation data, the SOW criteria for pre-design soil investigations in unpaved areas (excluding quality assurance/quality control samples) would require the following activities at this area:

- Soil sampling at 20 grid node locations;
- Analysis of 60 samples for PCBs; and
- Analysis of 20 samples for other Appendix IX+3 constituents (excluding pesticides and herbicides).

As mentioned above and as shown on Figure 2, GE has already conducted some pre-design soil investigations at the Building 33/34 Area. The depth increments sampled during those investigations are shown in Table 1 and 2 for PCBs and other Appendix IX+3 constituents, respectively. (It should be noted that, during these prior investigations, sample depths were computed from the top of the building slabs; thus, 0- to 1-foot soil samples were not collected at locations where the slabs were 12 inches or thicker, and such samples represent less than 1-foot increments at locations where the building slabs were less than 12 inches thick.) All of the data from these earlier pre-design investigations are considered usable to satisfy the pertinent SOW requirements. When accounting for the existing pre-design sampling data, the remaining sampling needs for this area were identified as follows:

Depth Increment	SOW Requirements [1]		Existing Pre-Design Data		Remaining Data Needs	
	PCBs	Appendix IX+3	PCBs	Appendix IX+3	PCBs	Appendix IX+3
0-1 ft	20	10	9	6	11	4
1-6 ft	20	5	11	4	9	1
6-15 ft	20	5	11	4	9	1
Total	60	20	31	14	29	6

Note:
1. Based on the SOW requirements for unpaved areas within the GE Plant Site.

To satisfy the remaining data needs, GE proposes to collect 29 additional soil samples from 11 locations at the Building 33/34 Area, and to analyze all those samples for PCBs and 6 of them for other Appendix IX+3 constituents (excluding pesticides and herbicides, consistent with the prior investigation in this area). The proposed sampling locations are shown on Figure 2, while Tables 1 and 2 summarize the existing and proposed PCB and Appendix IX+3 sampling locations and depths, respectively. In this case, GE proposes to compute the sample depths from the bottom of the building slabs, so as to obtain soil samples from the relevant depth increments below the slabs. (GE's proposal for handling the backfill material that will be placed in the slab-removal excavations is discussed in Section C below.) Note that the locations shown on Figure 2 are approximate and subject to change based on accessibility considerations and difficult drilling conditions. Also note that during the previous investigation within the Building 33/34 Area, one soil boring encountered refusal before reaching the targeted sampling depth (15 feet); a similar sampling condition may be encountered as part of this supplemental program.

The collection and analysis of the soil samples will be conducted following the procedures set forth in GE's approved *Field Sampling Plan/Quality Assurance Project Plan* (FSP/QAPP) and will be consistent with the procedures that were used during the previous pre-design investigations for this RAA. Specifically, the analytical procedures for the analysis of soil samples will be consistent with the procedures presented in Table 1 of the FSP/QAPP. The field procedures will follow the Standard Operating Procedures (SOPs) presented in Appendices B through X of the FSP/QAPP.

Soil samples collected during this investigation will utilize EPA Method 8082 for the analysis of Aroclor-specific PCBs. Results for PCBs will be reported on a dry-weight basis with a detection limit of 0.05 ppm for all Aroclors. Soil samples for other Appendix IX+3 constituents (which will exclude pesticides and herbicides) will be analyzed following the methods presented in Table 1 of the FSP/QAPP. Sample results will be presented on a dry-weight basis with detection limits consistent with those presented in Table 3 of the FSP/QAPP. Also, consistent with the previous investigations in this area, analysis of PCDDs and PCDFs will be performed using EPA Method 8290.

Quality control samples (i.e., matrix spike/matrix spike duplicates, field duplicates, trip blanks, and field blanks) will be collected at the frequency specified in Table 4 of the FSP/QAPP for each sample matrix collected. Tables 4 and 5 of the FSP/QAPP present the quality control criteria and corrective action procedures to be followed for each of the analytical procedures listed in Table 1 and for field-generated quality control samples. Overall project quality assurance will be ensured by following the procedures specified in the FSP/QAPP for sample collection and analysis, corrective action, and data reporting and validation.

Additional Building Characterization

As previously described in Part A of this letter, the building characterization activities performed by GE in September 1999 were conducted to evaluate potential options for the disposition of the building demolition debris, and specifically whether the debris would be suitable for consolidation at the Hill 78 or Building 71 OPCAs. Toward this objective, the sampling program implemented for the Building 33/34 Area focused on PCB and TCLP/RCRA waste characterization sampling and analyses. In light of the possible re-use of building demolition debris in the manner previously described (i.e., use as on-site backfill/grading material), GE and EPA have discussed the need for additional sampling and analysis activities to further characterize the materials that may be subject to re-use within the 30s Complex (or possibly elsewhere within the GE facility) following the completion of the building demolition activities.

As presented below, the currently available PCB sampling data are generally sufficient to characterize the building materials, although some additional sampling is proposed to ensure that all types of building materials have been tested. With respect to sampling for other Appendix IX+3 constituents, the proposed sampling program has been developed based on the guidelines presented in the SOW as well as the *Soil Cover/Backfill Characterization Plan*, which was submitted to EPA as part of the Project Operations Plan (POP) in December 2000, amended in October 2001, and approved by EPA in January 2002. The proposed building material sampling program is described below.

Based on the demolition plans developed by GE for the Building 33/34 Area, it is estimated that the volume of debris (e.g., concrete, brick, structural steel, etc.) to be generated from demolition activities will approach approximately 30,000 cubic yards (cy). In determining how to characterize these materials, the guidelines contained in the *Soil Cover/Backfill Characterization Plan* related to the sampling of potential backfill materials were considered. As stated in that plan, samples of potential backfill and soil

cover material are to be collected at a frequency of one composite sample (composed of 10 discrete "grab" samples) per 2,000 cy of material and to be analyzed for PCBs and Appendix IX+3 VOCs, SVOCs, and inorganics. In this case, however, some modification to those guidelines is appropriate considering that the building materials (unlike soils) do not lend themselves to composite sampling of numerous "grab" samples and recognizing that some of the demolition debris will be made up of structural steel that will not be subject to potential on-site re-use. In these circumstances, GE proposes to collect samples from 25 locations within the Building 33/34 Area for analyses of VOCs, SVOCs, and metals, as well as for PCB analysis at locations where PCB data are not already available. (Note that this proposed number of samples [25 per 30,000 cy] is above the number of composite samples [15 per 30,000 cy] that would be required under the *Soil Cover/Backfill Characterization Plan*.) The sampling locations will be selected based on the following considerations:

- Adequate distribution within the Building 33/34 Area, including a minimum of one sample per floor per building;
- Sample collection from different building materials, including concrete floor, concrete block, and brick;
- Consideration of the PCB sampling results, with new samples co-located at the five highest PCB sample result locations;
- Sample selection to include stained areas, areas that have been painted, and/or other areas potentially impacted by previous building operations; and
- Distribution of remaining samples to gain spatial representation of the building materials.

GE anticipates that the specific sampling locations will be selected during a field reconnaissance and subject to review and concurrence by EPA prior to sample collection. At each sample location, GE will collect a full-depth core sample of the material being tested. All 25 of these samples will be submitted for analysis of Appendix IX+3 VOCs, SVOCs, and metals, and 20 of them (i.e., excluding the five samples referenced in the third above bullet) will also be submitted for PCB analysis. Sampling and analytical procedures will follow the protocols set forth in GE's approved FSP/QAPP.

C. Evaluation of Supplemental Sampling Results

Following completion of the sampling activities proposed herein, GE will evaluate the results of the supplemental soil investigations and additional building characterization data. A summary of the anticipated evaluation components is presented below.

Soil Evaluations

Initially, GE will perform a screening-level review of the supplemental soil sampling results considering only the data from the Building 33/34 Area. Although that area represents only a portion of the relevant averaging area under the CD and SOW (i.e., the entire 30s Complex), the previous RD/RA evaluations, set forth in the Conceptual Work Plan, showed that the average concentrations of both PCBs and other Appendix IX+3 constituents in soils within the overall 30s Complex were substantially below the applicable Performance Standards. In these circumstances, if the new data are generally comparable to the prior data and/or if the combined prior and new data set shows average concentrations for the

Building 33/34 Area that are well below the Performance Standards, then the new data could not change the fact that the soil in the overall 30s Complex achieves the Performance Standards. In that case, there would be no need for a more detailed evaluation.

However, if the new data, in combination with the prior data from the Building 33/34 Area, indicate a possibility that the concentrations of PCBs or other constituents in soils within the overall 30s Complex may approach or exceed the applicable Performance Standards, then GE will revise the RD/RA evaluations of the entire 30s Complex for both PCBs and other Appendix IX+3 constituents, taking into account the new data as well as the prior data. These evaluations will involve the same approaches presented in the Conceptual Work Plan – i.e., comparisons to the applicable numerical Performance Standards for PCBs and PCDDs/PCDFs and a site-specific risk evaluation for other Appendix IX+3 constituents that are not screened out under the SOW criteria.

Regardless of whether the evaluation of the revised data set consists of a screening-level evaluation (as described above) or a full revision of the prior RD/RA evaluations, the evaluation will be made without taking into account the anticipated backfill for the excavation created by the removal of the existing building floor slabs and foundations at the Building 33/34 Area. This is a conservative approach because it will ensure that the 30s Complex achieves the applicable Performance Standards without even considering the backfill materials that will occupy the uppermost portions of the area following demolition activities. Once it has been determined whether building demolition debris and/or clean fill material from an off-site source will be used as backfill/grading material, the appropriate characterization data will be incorporated into the evaluations in the manner described below.

Building Material Evaluations

Similar to the evaluation of soils beneath the Building 33/34 Area, the evaluation of the existing and proposed building characterization data will focus first on the building materials themselves and then, as necessary, consider the potential impact of the building materials (if used as backfill/grading material) on the anticipated post-demolition conditions within the overall 30s Complex. Separate discussions related to the anticipated evaluations of PCB and non-PCB Appendix IX+3 constituents in the building materials are presented below. Note that the discussions presented below pertain to the possible re-use of suitable building demolition debris as backfill/grading material at the Building 33/34 Area. Assuming that the results of the evaluations summarized below indicate that the demolition debris is an acceptable source of backfill/grading material, GE may propose (separately and at a future date) to use excess demolition material as backfill material elsewhere in the GE facility.

For PCBs, the evaluation of the building material data will involve the calculation of an arithmetic average concentration using the existing data (73 samples) and the future supplemental investigation data. An arithmetic average concentration is an appropriate method to represent the PCB concentration of the materials, based on the well-distributed nature of the sampling locations, the collection of several "biased" samples from locations of potential PCB impact (e.g., stained areas), and the anticipated homogenization of the various building materials prior to use as backfill/grading material. If the arithmetic average concentration of the PCB building characterization data is below 25 ppm (the applicable Performance Standard for PCBs in soils for the 0- to 1-foot depth within the 30s Complex), it will be concluded the use of the building demolition debris will not adversely affect the outcome of the prior PCB evaluations and that such material would thus be suitable for potential use as backfill/grading material within the 30s Complex. Under that scenario, GE will consider PEDA's anticipated redevelopment/restoration activities -- including the locations and depths subject to use of the demolition

debris -- and evaluate the spatial average PCB concentrations for the appropriate depth increments within the 30s Complex. Based on the currently available PCB data set (summarized in GE's September 27, 2001 letter in Attachment A), it is expected that the building demolition materials will be suitable for re-use, based on the arithmetic average concentration of the 73 existing sample results (approximately 6.5 ppm). This evaluation will be updated once the proposed supplemental PCB data have been collected and are available.

The evaluation of VOCs, SVOCs, and metals in the building materials will generally follow the procedures described in Attachment F to the SOW (Protocols for the Evaluation of Non-PCB Constituents in Soil), as well as the *Soil Cover/Backfill Characterization Plan* contained in the POP. Initially, the analytical data for these constituents will be compared with the applicable EPA Region 9 Preliminary Remediation Goals (PRGs), using the industrial PRGs listed in Exhibit F-1 to Attachment F to the SOW. For certain constituents for which Region 9 PRGs do not exist, surrogate PRGs, based on Region 9 PRGs for similar chemicals, will be used, as described in Attachment F to the SOW. If the maximum concentration of each detected constituent is below the applicable PRG, the material will be considered suitable for use without limitation.

If the building materials contain VOCs, SVOCs, or metals at concentrations that exceed the PRGs, GE will further evaluate those constituents by calculating arithmetic average concentrations of the constituents in the building materials and comparing those average concentrations to the Method 1 S-2 soil standards set forth in the Massachusetts Contingency Plan (MCP). If the average concentrations of those constituents that exceeded the PRGs are below their respective MCP Method 1 S-2 soil standards, the materials will be considered suitable for re-use in the Building 33/34 Area. Alternatively, if such average concentrations exceed the Method 1 soil standards, GE may revise its prior RD/RA evaluations of the overall 30s Complex using the same approach presented in the Conceptual Work Plan -- i.e., a site-specific risk evaluation for Appendix IX+3 constituents that are not screened out under the SOW criteria -- and taking into account the new data as well as the existing data..

D. Schedule

GE proposes to conduct the sampling described above and to submit a summary report and data evaluation (as described above) to EPA within 90 days of EPA's approval of this proposal. In the interim, GE will provide all the results of this supplemental sampling program to EPA as part of its monthly status reports on CD activities.

Please call me if you have any questions regarding this proposal.

Sincerely,

John F. Novotny, P.E.
Manager-Facilities & Brownfields Programs

Attachments

cc: Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA
Michael Nalipinski, EPA
K.C. Mitkevicius, USACE
Dawn Jamros, Weston
Susan Steenstrup, MDEP
Susan Keydel, MDEP
Alan Weinberg, MDEP
Robert Bell, MDEP
Mayor Sara Hathaway, City of Pittsfield
Thomas Hickey, Director, PEDA
Richard Scapin, Chair, Pittsfield City Council
Pittsfield Department of Health
Jeffrey Bernstein, Bernstein, Cushner & Kimmel
Theresa Bowers, Gradient
Michael Carroll, GE
Rod McLaren, GE
Andrew Silfer, GE
James Nuss, BBL
James Bieke, Shea & Gardner
Samuel Gutter, Sidley Austin Brown & Wood
Public Information Repositories
GE Internal Repository

TABLE 1
EXISTING AND PROPOSED PCB SAMPLE LOCATIONS
30s COMPLEX

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

Grid Node	Existing / Proposed PCB Sample Locations		
	0-1 ft	1-6 ft	6-15 ft
A2	PEDA-33A-SB-1	PEDA-33A-SB-1	PEDA-33A-SB-1
A3	**P**	**P**	**P**
A5 [1]	**P**	RAA2-22	RAA2-22
A6	PEDA-33-X-SB-1	PEDA-33-X-SB-1	PEDA-33-X-SB-1
A7	RAA2-23 & RAA2-26	RAA2-23 & RAA2-26	RAA2-23 & RAA2-26
B3	**P**	**P**	**P**
B4	RAA2-41	RAA2-41	RAA2-41
B5	PEDA-33-SB-2	PEDA-33-SB-2	PEDA-33-SB-2
B6	**P**	**P**	**P**
B7	PEDA-33-SB-1	PEDA-33-SB-1	PEDA-33-SB-1
B8	**P**	**P**	**P**
C2 [2]	PEDA-34-SB-1	**P**	**P**
C3	RAA2-20	RAA2-20	RAA2-20
C4	**P**	**P**	**P**
C5	**P**	**P**	**P**
C6	**P**	**P**	**P**
C7	**P**	**P**	**P**
D1 [1]	**P**	RAA2-42	RAA2-42
D4	RAA2-27	RAA2-27	RAA2-27
D5 [1]	**P**	RAA2-28	RAA2-28

Notes:

1. The floor slab at prior boring locations RAA2-22, RAA2-28, and RAA2-42 was greater than or equal to 1-foot thick and a soil sample was consequently not obtained for analysis. For this supplemental investigation, the soil sampling will begin below the existing floor slabs.
2. At boring location PEDA-34-SB-1, refusal was encountered at a depth of 3 feet. A soil boring will be advanced at the closest grid node (C2) and soil samples will be collected if the appropriate depths are achieved.

P - Indicates proposed sample location and interval

Sampling Summary:

Required Number of PCB Samples (all depths): 60
Number of Existing PCB Samples: 31
Number of Proposed PCB Samples: 29

TABLE 2
EXISTING & PROPOSED APPENDIX IX+3 SAMPLE LOCATIONS
30s COMPLEX

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

Grid Node	Existing / Proposed Appendix IX+3 Locations		
	0-1 ft	1-6 ft	6-15 ft
A2	PEDA-33A-SB-1	---	---
A3	---	---	---
A5 (1)	**P**	---	RAA2-22
A6	PEDA-33-X-SB-1	---	---
A7	---	RAA2-23	RAA2-26
B3	**P**	---	---
B4	---	RAA2-41	---
B5	---	---	PEDA-33-SB-2
B6	---	---	---
B7	PEDA-33-SB-1	---	---
B8	---	---	---
C2	PEDA-34-SB-1	---	---
C3	RAA2-20	---	---
C4	---	---	---
C5	**P**	---	**P**
C6	---	---	---
C7	---	**P**	---
D1 (1)	**P**	RAA2-42	---
D4	RAA2-27	---	RAA2-27
D5	---	RAA2-28	---

Notes:

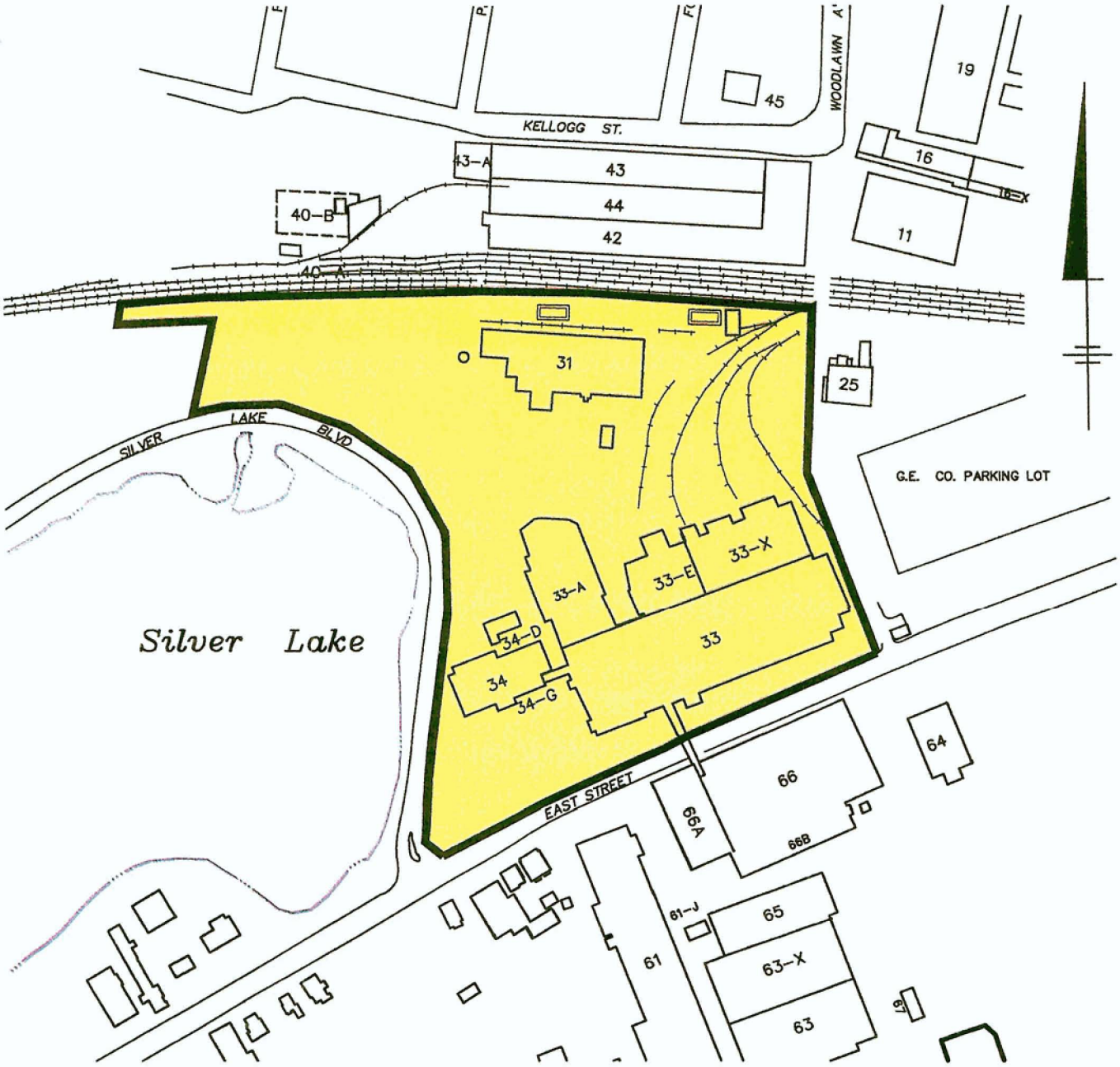
1. The floor slab at prior boring locations RAA2-22 and RAA2-42 was greater than or equal to 1-foot thick and a soil sample was consequently not obtained for analysis. For this supplemental investigation, the soil sampling will begin below the existing floor slabs.

P - Indicates proposed sample location and interval

--- - Indicates no sample exists or will be obtained from that location/depth interval

Sampling Summary:

Required Number of Appendix IX+3 Samples (all depths): 20
Number of Existing Appendix IX+3 Samples (0-1 ft): 6
Number of Proposed Appendix IX+3 Samples (0-1 ft): 4
Number of Existing Appendix IX+3 Samples (1-6 ft): 4
Number of Proposed Appendix IX+3 Samples (1-6 ft): 1
Number of Existing Appendix IX+3 Samples (6-15 ft): 4
Number of Proposed Appendix IX+3 Samples (6-15 ft): 1



NOTES:

1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. – FLOWN IN APRIL 1990; DATA PROVIDED BY GENERAL ELECTRIC COMPANY; AND BLASLAND AND BOUCK ENGINEERS, P.C. P.C. CONSTRUCTION PLANS.
2. NOT ALL PHYSICAL FEATURES SHOWN.
3. SITE BOUNDARIES/LIMITS ARE APPROXIMATE.

REMOVAL ACTION AREA:

30s COMPLEX REMOVAL ACTION AREA

0 300' 600'

GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
PROPOSED SUPPLEMENTAL SOIL INVESTIGATION – 30's COMPLEX

LOCATION MAP

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

FIGURE 1

L: ON=*, OFF=*REF*
P: PAGESET/PLT-AP
11/20/02 SYR-54-RCB DWM LAF
C:/20191001/20191B03.DWG

LEGEND:

- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- EASEMENT
- J9-23-23 — PARCEL ID
- ▲ QP-30 — GE EXISTING SURFACE SOIL SAMPLE LOCATION
- ● MM-3 — GE EXISTING SOIL BORING LOCATION
- ● BH000467 — EPA SOIL BORING LOCATION
- (BH000321) — EPA SPLIT SAMPLE IDENTIFICATION
- ■ F-23 — EXISTING SOIL SAMPLE LOCATION USED TO SATISFY ADDITIONAL ARSENIC ANALYSIS
- PRE-2002 DIOXINS/FURANS SAMPLE LOCATION
- SUPPLEMENTAL (2002) DIOXINS/FURANS SAMPLE LOCATION
- PROPOSED ADDITIONAL DIOXINS/FURANS SAMPLE LOCATION

NOTES:

1. BASE MAP MODIFIED FROM SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS, DATED 8/15/01.

0 100' 200'

GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

NEWELL STREET AREA I – PROPOSAL FOR ADDITIONAL PRE-DESIGN INVESTIGATIONS

DIOXINS/FURANS SOIL SAMPLE LOCATIONS WITHIN 0- TO 1-FOOT DEPTH INCREMENT

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

FIGURE 1

X: 10112X02.DWG
L: ON=*, OFF=REF, *|CONT-*
P: PAGESET/PLT-DL
12/20/02 SYR-54-LJP DMW LAF
C/10112003/10112P41.DWG

LEGEND:

- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- EASEMENT
- J9-23-23 PARCEL ID
- MM-3 GE EXISTING SOIL BORING LOCATION
- BH000467 EPA SOIL BORING LOCATION
- (BH000321) EPA SPLIT SAMPLE IDENTIFICATION
- F-23 EXISTING SOIL SAMPLE LOCATION USED TO SATISFY ADDITIONAL ARSENIC ANALYSIS
- PRE-2002 DIOXINS/FURANS SAMPLE LOCATION
- SUPPLEMENTAL (2002) DIOXINS/FURANS SAMPLE LOCATION
- PROPOSED ADDITIONAL DIOXINS/FURANS SAMPLE LOCATION

NOTES:

1. BASE MAP MODIFIED FROM SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS, DATED 8/15/01.

0 100' 200'

GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

NEWELL STREET AREA I – PROPOSAL FOR ADDITIONAL PRE-DESIGN INVESTIGATIONS

DIOXINS/FURANS SOIL SAMPLE LOCATIONS WITHIN 3- TO 6-FOOT DEPTH INCREMENT

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

FIGURE 2

X: 10112X02.DWG
L: ON=*, OFF=REF, *|CONT-*
P: PAGESET/PLT-DL
12/20/02 SYR-54-LJP DMW LAF
C/10112003/10112P42.DWG

Attachment A

September 27, 2001
Building Characterization Letter to EPA
(Portion Pertaining to Building 33/34 Characterization)

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

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

Transmitted Via Federal Express

September 27, 2001

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

Re: GE-Pittsfield/Housatonic River Site
20s and 30s Complexes (GECD120)
Buildings 25, 33, and 34 Characterization Information

Dear Mr. Nalipinski:

Based on our September 19, 2001 meeting, enclosed please find draft characterization information pertaining to Buildings 25, 33, and 34 located within the 20s and 30s Complexes at the General Electric Company facility in Pittsfield, Massachusetts. These materials are being provided in anticipation of the U.S. Environmental Protection Agency and Massachusetts Department of Environmental Protection site visit on October 2, 2001 in Pittsfield.

Please feel free to contact me if you have any questions or require additional information.

Sincerely,

John F. Novotny, P.E.
Manager, Facility and Brownfields Programs

JJL/meg
Enclosures

cc: B. Olson, EPA
R. Bell, MDEP
S. Keydel, MDEP
C. Moran, Weston
R. McLaren, GE
J. Bieke, Shea & Gardner
J. Nuss, Blasland, Bouck & Lee, Inc.

Draft Characterization Information

BLASLAND, BOUCK & LEE, INC. *engineers & scientists*

Building 33

Blasland, Bouck & Lee, Inc.
Building 33 Brownfields
Sampling Program

(201.47.09)

Table 1

33-1-BW-1	9/14/99	33-1-BW-1	<1.0	Brick wall	Field Composite Discrete Core	0-4"	
33-1-CF-1	9/14/99	33-1-CF-1	38.0	Concrete floor	Discrete Full Core	0-2"	
33-1-CF-2	9/14/99	33-1-CF-2	1.66	Concrete floor	Discrete Full Core	0-5"	
33-1-CF-3	9/14/99	33-1-CF-3	4.1	Concrete floor	Discrete Full Core	0-2.5"	
33-1-CF-4	9/14/99	33-1-CF-4	1.62	Concrete floor	Discrete Full Core	0-2"	
33-2-BW-1	9/13/99	33-2-BW-1	<1.0	Brick wall	Field Composite Discrete Core	0-4"	
33-2-CF-1	9/13/99	33-2-CF-1	<1.0	Concrete floor	Discrete Full Core	0-4"	
33-2-CF-2	9/13/99	33-2-CF-2	<1.0	Concrete floor	Discrete Full Core	0-4"	
33-2-CF-3	9/13/99	33-2-CF-3	<1.0	Concrete floor	Discrete Full Core	0-4"	
33-2-CF-4	9/13/99	33-2-CF-4	<1.0	Concrete floor	Discrete Full Core	0-4"	
33-2-CF-5	9/13/99	33-2-CF-5	<1.0	Concrete floor	Discrete Full Core	0-4"	
33-2 -CF-6	9/13/99	33-2-CF-6	<1.0	Concrete floor	Discrete Full Core	0-4"	
33-2-CF-7	9/13/99	33-2-CF-7	<1.0	Concrete floor	Discrete Full Core	0-4"	
33-2-CF-8	9/13/99	33-2-CF-8	<1.0	Concrete floor	Discrete Full Core	0-4"	
33-2-CF-9	9/13/99	33-2-CF-9	<1.0	Concrete floor	Discrete Full Core	0-4"	
33-2-CF-10	9/13/99	33-2-CF-10	1.18	Concrete floor	Discrete Full Core	0-4"	
33-3-BW-1	9/13/99	33-3-BW-1	<1.0	Brick wall	Field Composite Discrete Core	0-4"	
33-3-CF-1	9/8/99	33-3-CF-1	<1.0	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-2	9/8/99	33-3-CF-2	<1.0	Concrete floor	Discrete Full Core	0-7"	
33-3 CF-3	9/8/99	33-3-CF-3	1.7	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-4	9/8/99	33-3-CF-4	1.5	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-5	9/8/99	33-3-CF-5	ND	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-6	9/8/99	33-3-CF-6	ND	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-7	9/8/99	33-3-CF-7	ND	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-8	9/8/99	33-3-CF-8	ND	Concrete floor	Discrete Full Core	0-7"	

Blasland, Bouck & Lee, Inc.
Building 33 Brownfields
Sampling Program

(201.47.09)

Table 1

33-3- CF-9	9/8/99	33-3-CF-9	<1.0	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-10	9/8/99	33-3-CF-10	8.9	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-11	9/8/99	33-3-CF-11	<1.0	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-12	9/8/99	33-3-CF-12	<1.0	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-13	9/8/99	33-3-CF-13	ND	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-14	9/8/99	33-3-CF-14	<1.0	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-15	9/8/99	33-3-CF-15	72.0	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-16	9/8/99	33-3-CF-16	15.0	Concrete floor	Discrete Full Core	0-7"	
33-3-CF-17	9/8/99	33-3-CF-17	<1.0	Concrete floor	Discrete Full Core	0-7"	
33-4-CF-1	9/13/99	33-4-CF-1	<1.0	Concrete floor	Discrete Full Core	0-6"	
33-TCLP-BW-1	9/8/99	33-TCLP-BW-1	TCLP(see note 1)	Brick wall	Field Composite Discrete Core	0-4"	
33-TCLP-CF-1	9/8/99	33-TCLP-CF-1	TCLP(see note 1)	Concrete floor	Field Composite Discrete Core	0-7"	
33-TCLP-BW-2	9/14/99	33-TCLP-BW-2	TCLP(see note 1)	Brick wall	Field Composite Discrete Core		
33-TCLP-CF-2	9/14/99	33-TCLP-CF-2	TCLP(see note 1)	Concrete floor	Field Composite Discrete Core		
33-Comp-BW-1	9/8/99	33-Comp-BW-1	<1.0	Brick wall	Field Composite Discrete Core	0-4"	
33-Comp-CF-1	9/8/99	33-Comp-CF-1	<1.0	Concrete floor	Field Composite Discrete Core	0-7"	
33-Comp-CF-2	9/8/99	33-Comp-CF-2	1.67	Concrete floor	Field Composite Discrete Core	0-7"	
33A-CF-1	9/14/99	33A-CF-1	12.4	Concrete floor	Discrete Full Core	0-4"	
33A-CF-2	9/14/99	33A-CF-2	7.0	Concrete floor	Discrete Full Core	0-4"	
33A-CF-3	9/14/99	33A-CF-3	2.8	Concrete floor	Discrete Full Core	0-4"	
33A-CF-4	9/14/99	33A-CF-4	6.4	Concrete floor	Discrete Full Core	0-4"	
33A-CF-5	9/14/99	33A-CF-5	7.0	Concrete floor	Discrete Full Core	0-4"	
33A-CF-6	9/14/99	33A-CF-6	72.0	Concrete floor	Discrete Full Core	0-7"	

Blasland, Bouck & Lee, Inc.
Building 33 Brownfields
Sampling Program

(201.47.09)

Table 1

33X-1-BW-1	9/8/99	33X-1-BW-1	2.6	Brick wall	Field Composite Discrete Core	0-4"	
33X-1-CF-1	9/8/99	33X-1-CF-1	<1.0	Concrete floor	Discrete Full Core	0-7"	
33X-1-CF-2	9/8/99	33X-1-CF-2	1.21	Concrete floor	Discrete Full Core	0-7"	
33X-1-CF-3	9/8/99	33X-1-CF-3	<1.0	Concrete floor	Discrete Full Core	0-7"	
33X-1-CF-4	9/8/99	33X-1-CF-4	1.10	Concrete floor	Discrete Full Core	0-7"	
33X-1-CF-5	9/8/99	33X-1-CF-5	3.7	Concrete floor	Discrete Full Core	0-7"	
33X-1-CF-6	9/8/99	33X-1-CF-6	10.8	Concrete floor	Discrete Full Core	0-7"	
33X-1-CF-7	9/8/99	33X-1-CF-7	3.34	Concrete floor	Discrete Full Core	0-7"	
33X-1-CF-8	9/8/99	33X-1-CF-8	2.6	Concrete floor	Discrete Full Core	0-7"	
33N-Ext-BW-1	9/8/99	33N-Ext-BW-1	2.2	Brick wall	Field Composite Discrete Core	0-4"	
33N-Ext-CF-1	9/8/99	33N-Ext-CF-1	<1.0	Concrete floor	Discrete Full Core	0-7"	
33N-Ext-CF-2	9/8/99	33N-Ext-CF-2	<1.0	Concrete floor	Discrete Full Core	0-7"	

...e 1: TCLP = TCLP VOCs,SVOCs,METALS,REACTIVITY,IGNITABILITY,PH

GENERAL ELECTRIC

K-9254433
CONT ON SHEET 2 SH NO. 1

REV NO.

CONT ON SHEET SH NO.

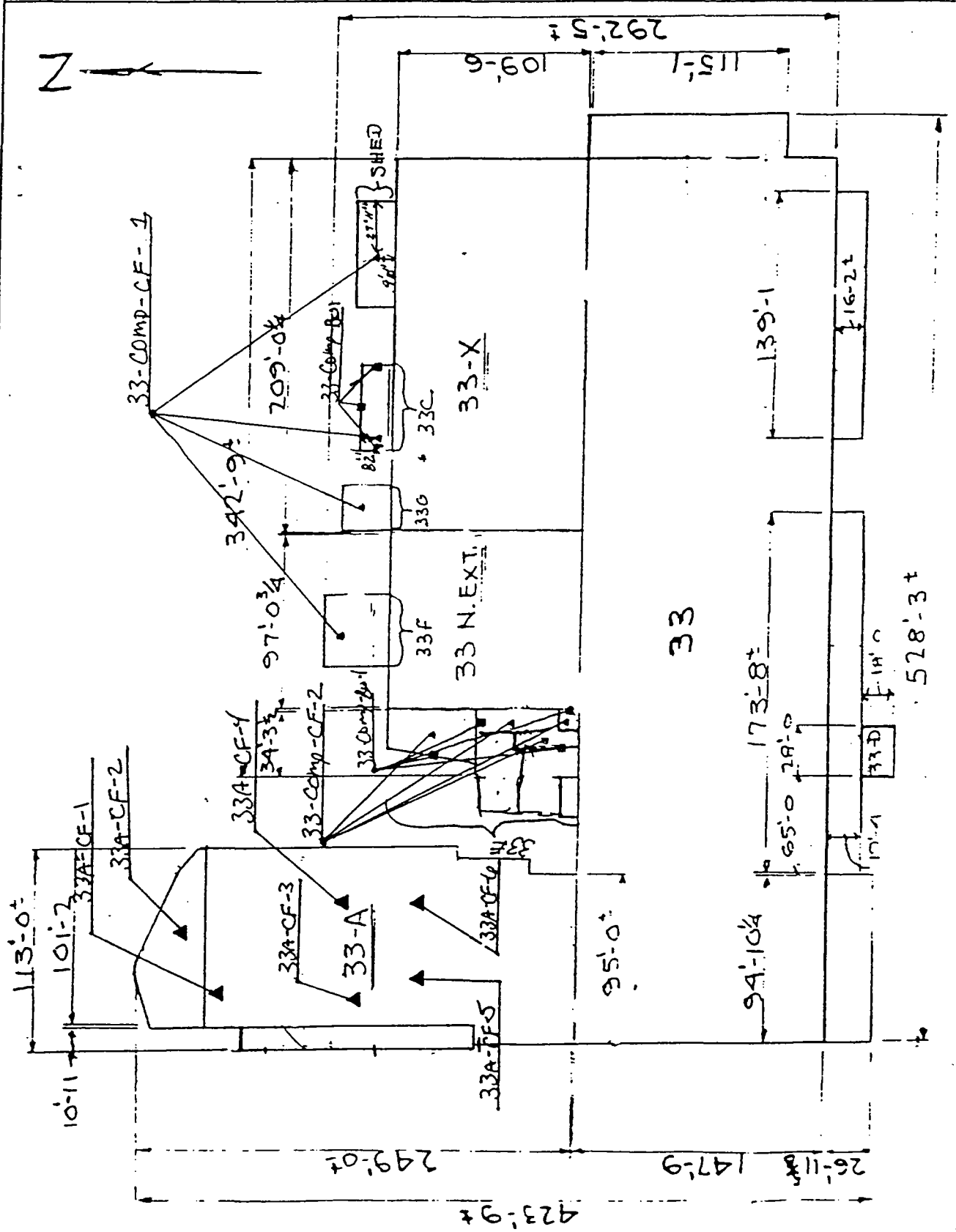
TITLE

PLAN

FIRST MADE FOR BLDG. 33 COMPLEX

REVISION

DRAFT



PRINTS TO

MADE BY

ISSUED

APPROVALS

DIV OR DEPT.

LOCATION

K-9254433
CONT ON SHEET 2 SH NO 1

FF-803-WA (3-78)

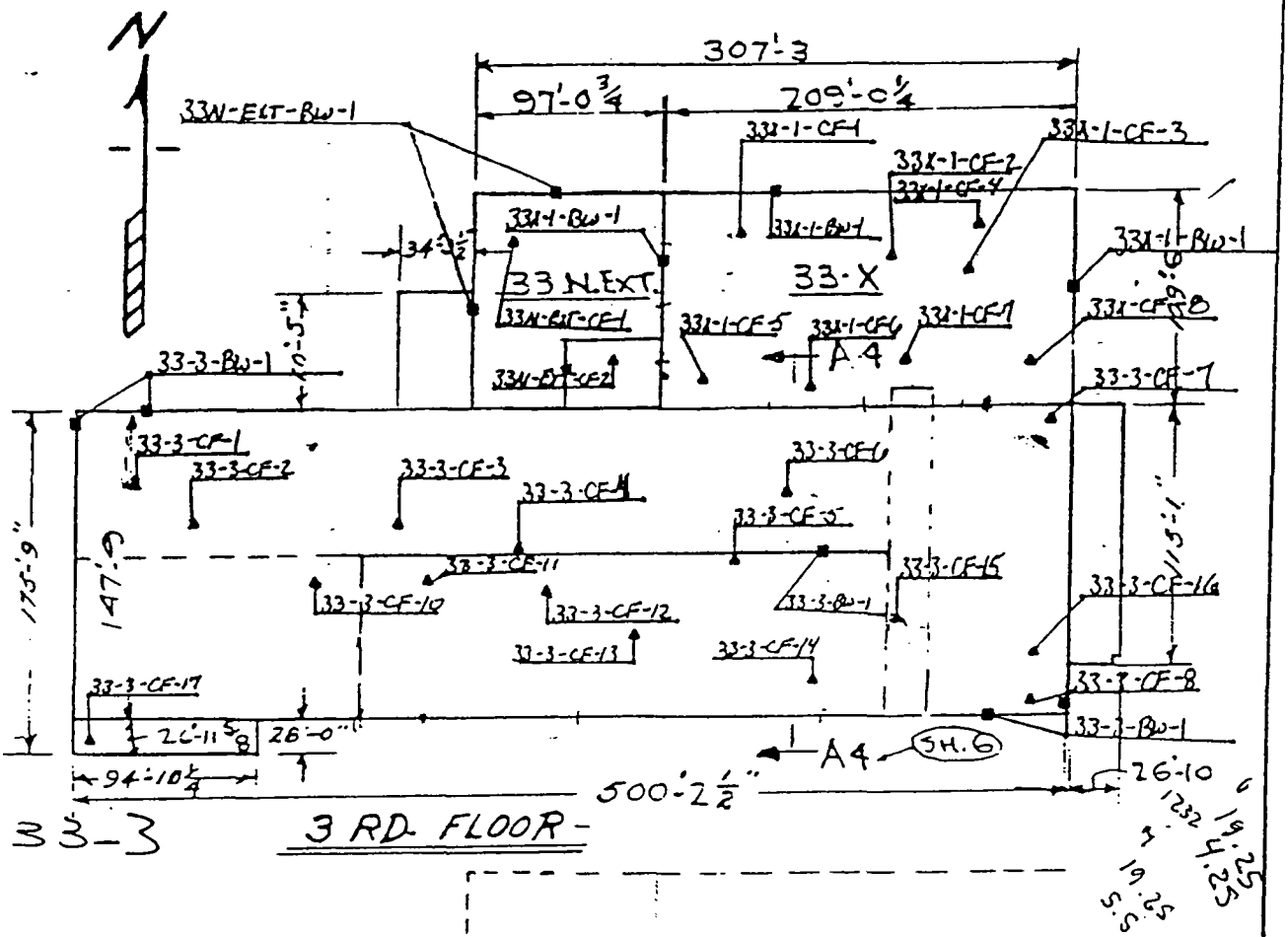
CODE IDENT NO

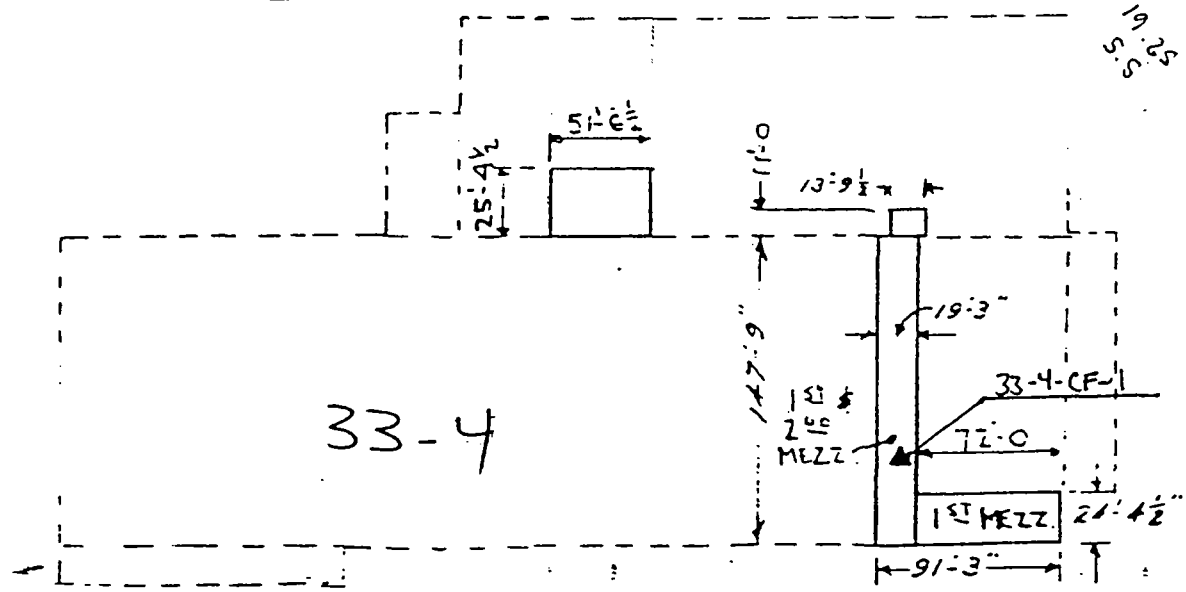
THIRD ANGLE PROJECTION

K-9254433

FLOOR PLAN BLDG. -33-

TOTAL FLOOR AREA ON SHEET #2





3RD. FLOOR MEZZ'S.

DRAFT

REVISIONS	MADE BY Geo. LeClair 4-2-45	INSPECTED BY [illegible] 10-46	
	GENERAL ELECTRIC Pittsfield WORKS	K-9254433 SHEET No. 4 CONT. ON SHEET 5	PRINTS TO
PT-469-A (1-41)	602-A PRINTED IN U.S.A.		

K-9254433

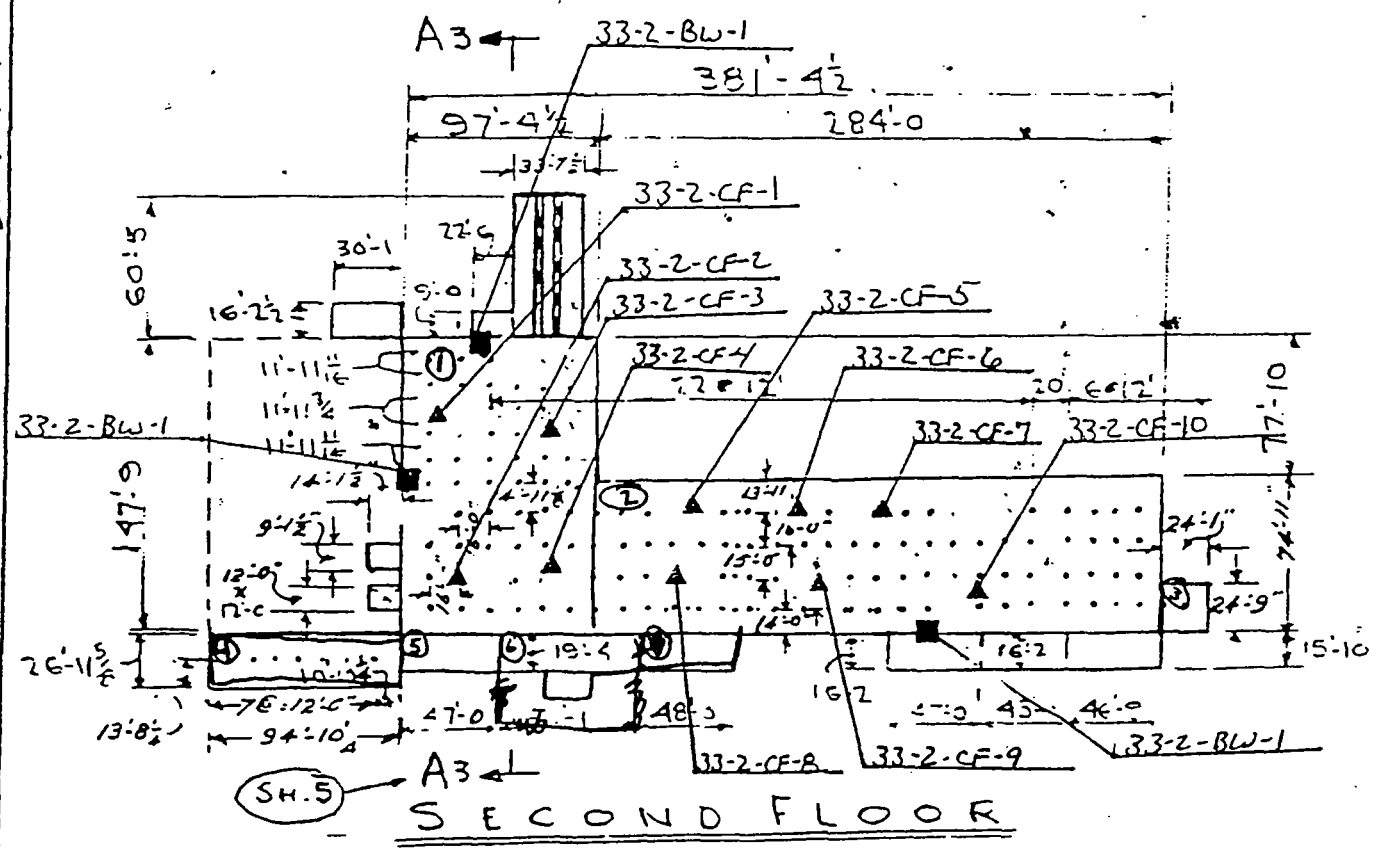
THIRD ANGLE PROJECTION

K-92544433

FLOOR PLAN BLDG.-33-

N.

TOTAL FLOOR AREA ON SHEET #2



SECOND FLOOR

DRAFT

	MADE BY Geo. St. Clair 4-6-45	INSPECTED BY May 10-46	OSN
REVISIONS	GENERAL ELECTRIC Pittsfield WORKS	K-92544433 SHEET NO. 3 CONT. ON SHEET 4.	PRINTS TO
77-447-A (1-41)	6:2-A PRINTED IN U.S.A.		

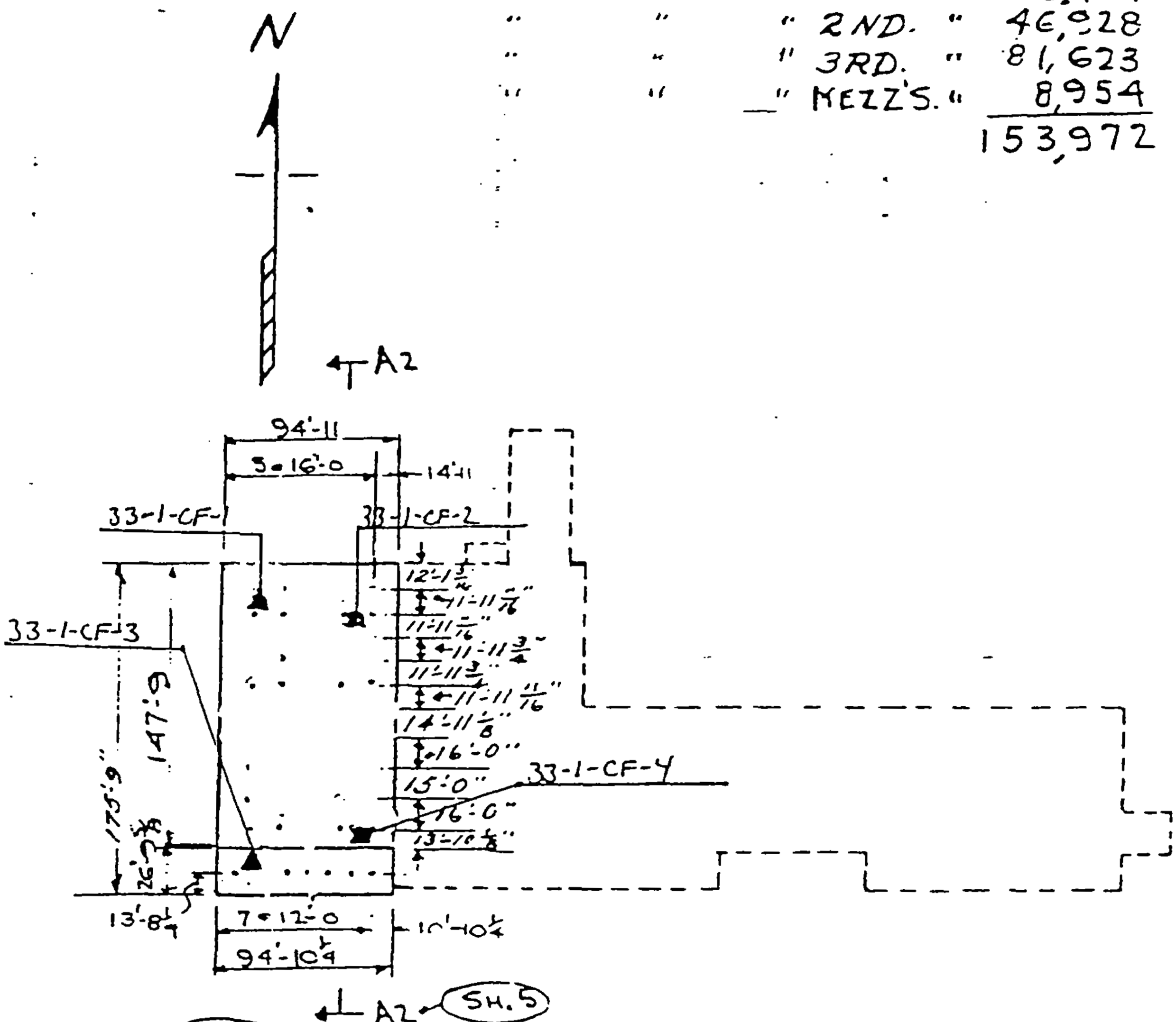
K-92544433

THIRD ANGLE PROJECTION

K-9254433

FLOOR PLAN BLDG. -33-

TOTAL	FLOOR	AREA			Sq. ft.
"	"	"	1ST. FLOOR	16,467	" "
"	"	"	2ND. "	46,928	" "
"	"	"	3RD. "	81,623	" "
"	"	"	MEZZ'S. "	8,954	" "
				153,972	" "



33-1 FIRST FLOOR

DRAFT

REVISIONS	MADE BY Geo. Leclair 4-17-45	INSPECTED BY [illegible] 10-44	JPB.M
	GENERAL ELECTRIC Pittsfield WORKS	K-9254433 SHEET NO. 2 CONT. ON SHEET 3	PRINTS TO

FF-462-A (1-41) 662-A PRINTED IN U.S.A.

K-9254433

Draft Characterization Information

BLASLAND, BOUCK & LEE, INC. *engineers & scientists*

Building 34

Blasland, Bouck & Lee, Inc.
Building 34 Brownfields
Sampling Program

(201.47.06)

Table 1

34-1-CB-1	9/15/99	34-1-CB-1	<1.0	Concrete block	Field Composite Discrete Core	0-6"	
34-1-CF-1	9/15/99	34-1-CF-1	<1.0	Concrete floor	Discrete Full Core	0-6"	
34-1-CF-2	9/15/99	34-1-CF-2	45.0	Concrete floor	Discrete Full Core	0-6"	
34-1-CF-3	9/15/99	34-1-CF-3	<1.0	Concrete floor	Discrete Full Core	0-6"	
34-2-CB-1	9/15/99	34-2-CB-1	<1.0	Concrete block	Field Composite Discrete Core	0-6"	
34-2-CF-1	9/15/99	34-2-CF-1	<1.0	Concrete floor	Discrete Full Core	0-6"	
34-2-CF-2	9/15/99	34-2-CF-2	<1.0	Concrete floor	Discrete Full Core	0-6"	
34-2-CF-3	9/15/99	34-2-CF-3	<1.0	Concrete floor	Discrete Full Core	0-6"	
34-3-CB-1	9/15/99	34-3-CB-1	<1.0	Concrete block	Field Composite Discrete Core	0-6"	
34-3-CF-1	9/15/99	34-3-CF-1	7.8	Concrete floor	Discrete Full Core	0-6"	
34-3-CF-2	9/15/99	34-3-CF-2	8.0	Concrete floor	Discrete Full Core	0-6"	
34-3-CF-3	9/15/99	34-3-CF-3	3.8	Concrete floor	Discrete Full Core	0-6"	
34-4-CB-1	9/15/99	34-4-CB-1	1.6	Concrete block	Field Composite Discrete Core	0-6"	
34-4-CF-1	9/15/99	34-4-CF-1	18.0	Concrete floor	Discrete Full Core	0-6"	
34-4-CF-2	9/15/99	34-4-CF-2	6.6	Concrete floor	Discrete Full Core	0-6"	
34-4-CF-3	9/15/99	34-4-CF-3	3.6	Concrete floor	Discrete Full Core	0-6"	
34-5-CF-1	9/15/99	34-5-CF-1	<1.0	Concrete floor	Discrete Full Core	0-3"	
34-TCLP-CB-1	9/15/99	34-TCLP-CB-1	TCLP (see note 1)	Concrete block	Field Composite Discrete Core		
34-TCLP-CF-1	9/15/99	34-TCLP-CF-1	TCLP (see note1)	Concrete floor	Field Composite Discrete Core		

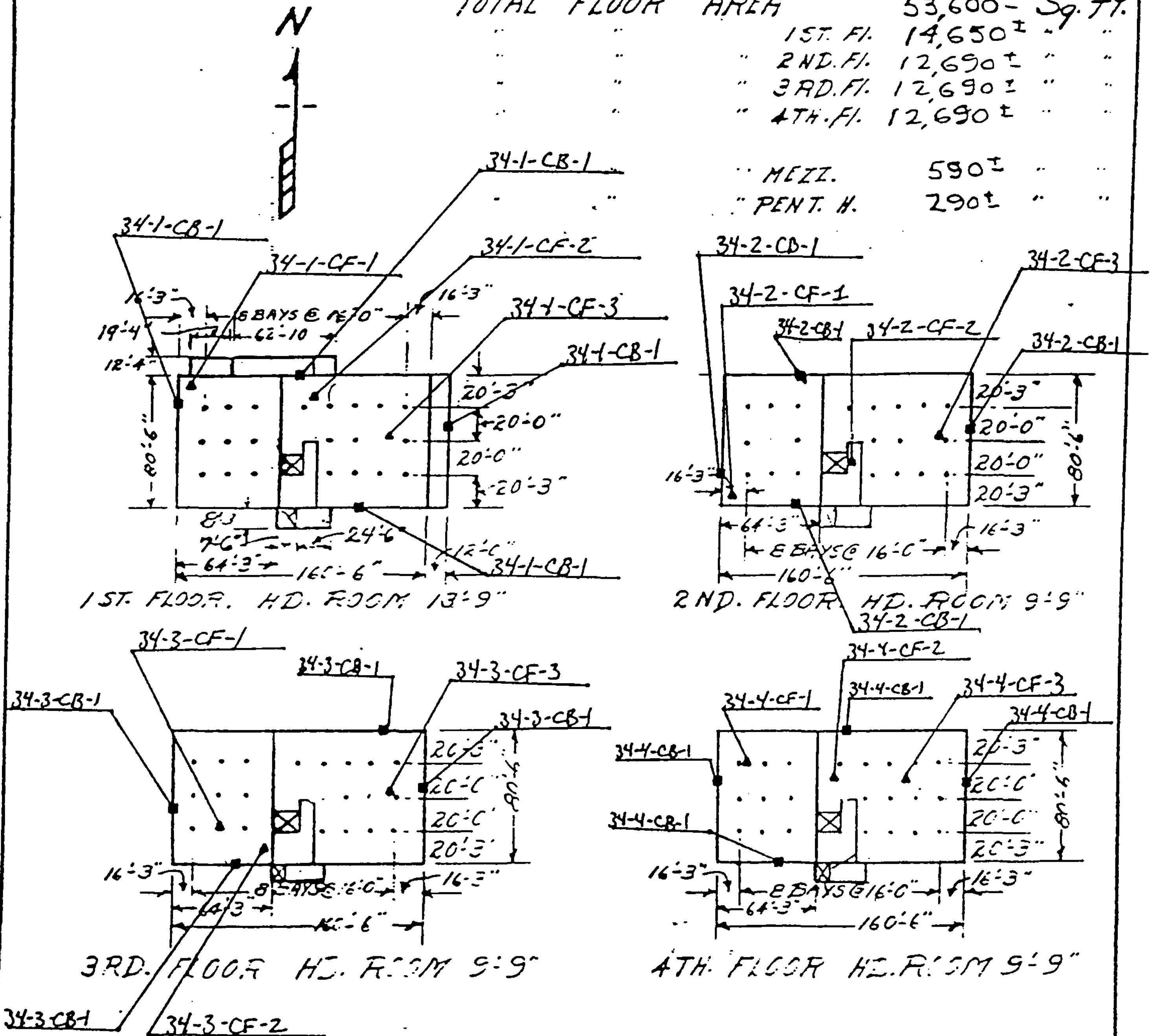
Note 1: TCLP = TCLP VOCs,SVOCs,METALS,REACTIVITY,IGNITABILITY,PH

THIRD ANGLE PROJECTION

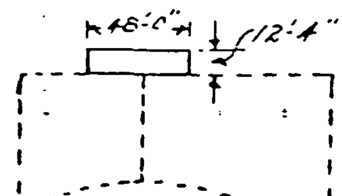
K-9254434

FLOOR PLAN BLDG. -34-

TOTAL FLOOR AREA	53,600±	Sq. ft.
" " " 1ST. Fl.	14,650±	" "
" " " 2ND. Fl.	12,690±	" "
" " " 3RD. Fl.	12,690±	" "
" " " 4TH. Fl.	12,690±	" "
" MEZZ.	590±	" "
" PENT. H.	290±	" "



(1) DISCRETE IN PENT HOUSE



1ST. MEZZ.

DRAFT

1	5-17-66	
REVISIONS		
MADE BY [illegible] 2045	INSPECTED BY [illegible]	
GENERAL ELECTRIC WORKS Pittsfield	K-9254434 SHEET NO. 1 CONT. ON SHEET 2	PRINTS TO
6CZ-A	PRINTED IN U.S.A.	

FF-40-A (1-41)

Attachment B

October 30, 2001
Building Characterization Letter to EPA

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

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

Transmitted Via Federal Express

October 30, 2001

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

Re: GE – Pittsfield/Housatonic River Site
20s and 30s Complexes *(GECD120)*
Buildings 33 and 34 TCLP Information

Dear Mr. Nalipinski:

Per your request, enclosed please find draft Toxicity Characteristic Leachate Procedure (TCLP) information pertaining to Buildings 33 and 34 located within the 30s Complex at the General Electric Company's (GE's) Pittsfield, Massachusetts facility. These materials are being provided to supplement characterization information previously provided by GE in a letter dated September 27, 2001.

Please feel free to contact me with any questions.

Sincerely,

John F. Novotny/JJL

John F. Novotny, P.E.
Manager, Facility and Brownfields Programs

JJL/meg
Enclosures

cc: B. Olson, EPA
R. Bell, MDEP
S. Keydel, MDEP
C. Moran, Weston
R. McLaren, GE
J. Bieke, Shea & Gardner
J. Nuss, BBL

DRAFT

Table 1

General Electric Company
Pittsfield, Massachusetts

Building 33 Bronwfields Sampling Program

Summary of TCLP Building Material Characterization Data

Sample ID / Date Collected	TCLP Regulatory Limits	33-TCLP-BW-1 9/8/99	33-TCLP-CF-1 9/8/99	33-TCLP-BW-2 9/14/99	33-TCLP-CF-2 9/14/99
Volatile Organics					
1,1-Dichloroethene	0.7	ND(0.10)	ND(0.10)	ND(0.10)	ND(0.10)
1,2-Dichloroethene	0.5	ND(0.10)	ND(0.10)	ND(0.10)	ND(0.10)
2-Butanone	200	ND(0.20)	ND(0.20)	ND(0.20)	ND(0.20)
Benzene	0.5	ND(0.10)	ND(0.10)	ND(0.10)	ND(0.10)
Carbon Tetrachloride	0.5	ND(0.10)	ND(0.10)	ND(0.10)	ND(0.10)
Chlorobenzene	100	ND(0.10)	ND(0.10)	ND(0.10)	ND(0.10)
Chloroform	6	ND(0.10)	ND(0.10)	ND(0.10)	ND(0.10)
Tetrachloroethene	0.7	ND(0.10)	ND(0.10)	ND(0.10)	ND(0.10)
Trichloroethene	0.5	ND(0.10)	ND(0.10)	ND(0.10)	ND(0.10)
Vinyl Chloride	0.2	ND(0.10)	ND(0.10)	ND(0.10)	ND(0.10)
Semivolatile Organics					
1,4-Dichlorobenezene	7.5	ND(0.05)	ND(0.05)	ND(0.05)	ND(0.05)
2,4,5-Trichlorophenol	400	ND(0.05)	ND(0.05)	ND(0.05)	ND(0.05)
2,4,6-Trichlorophenol	2	ND(0.05)	ND(0.05)	ND(0.05)	ND(0.05)
2,4-Dinitrotoluene	0.13	ND(0.05)	ND(0.05)	ND(0.05)	ND(0.05)
Total Cresols	200	ND(0.05)	ND(0.05)	ND(0.05)	ND(0.05)
Hexachlorobenzene	0.13	ND(0.05)	ND(0.05)	ND(0.05)	ND(0.05)
Hexachlorobutadiene	0.5	ND(0.05)	ND(0.05)	ND(0.05)	ND(0.05)
Hexachloroethane	3	ND(0.05)	ND(0.05)	ND(0.05)	ND(0.05)
Nitrobenzene	2	ND(0.05)	ND(0.05)	ND(0.05)	ND(0.05)
Pentachlorophenol	100	ND(0.05)	ND(0.05)	ND(0.05)	ND(0.05)
Pyridine	5	ND(0.05)	ND(0.05)	ND(0.05)	ND(0.05)
Inorganics					
Arsenic	5	ND(0.50)	ND(0.50)	ND(0.50)	ND(0.50)
Barium	100	ND(10.0)	ND(10.0)	ND(10.0)	ND(10.0)
Cadmium	1	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Chromium	5	ND(0.50)	ND(0.50)	ND(0.50)	ND(0.50)
Lead	5	ND(0.50)	ND(0.50)	ND(0.50)	ND(0.50)
Mercury	0.2	ND(0.020)	ND(0.020)	ND(0.020)	ND(0.020)

DRAFT

Table 1

General Electric Company
Pittsfield, Massachusetts

Building 33 Bronwfields Sampling Program

Summary of TCLP Building Material Characterization Data

Sample ID / Date Collected	TCLP Regulatory Limits	33-TCLP-BW-1 9/8/99	33-TCLP-CF-1 9/8/99	33-TCLP-BW-2 9/14/99	33-TCLP-CF-2 9/14/99
Inorganics (con't)					
Selenium	1	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)
Silver	5	ND(0.50)	ND(0.50)	ND(0.50)	ND(0.50)
Ignitability	Not	Negative	Negative	Negative	Negative
Reactive Cyanide	Not	ND	ND	ND	ND
Reactive Sulfide	Not	ND	ND	ND	ND
pH	Not	12.1	10.5	9.5	12.3

Notes:

1. **Results are presented in milligrams per liter (mg/L).**
2. **Samples were collected by Blasland, Bouck & Lee, Inc., and were submitted to CT&E Environmental Services, Inc. for analysis of TCLP.**
3. **ND-Analyte was not detected. The number in parentheses is the associated quantitation limit for volatiles and semivolatiles and the associated detection limit for other constituents.**
4. **The criteria for determining if a solid waste exhibits the characteristics of a hazardous waste include the following:**

   Ignitability: flashpoint <60°C, 140°F
   Corrosivity: pH below 2 or above 12.5 Standard Units (S.U.)
   Reactivity: No numeric regulatory criteria

5. **BW - Brick Wall. 33-TCLP-BW-1 is a field composite of 33-Comp-BW-1.**
   33-TCLP-BW-2 is a field composite of 33X-1-BW-1, 33N-Ext-BW-1, 33-1-BW-1, 33-2-BW-1, and 33-3-BW-1.
   CF - Concrete Floor. 33-TCLP-CF-1 is a field composite of 33-Comp-CF-1 and 33-Comp-CF-2.
   33-TCLP-CF-2 is a field composite of 33X-1-CF-1 through CF-8, 33N-Ext-CF-1 and CF-2, 33-1-CF-1 through CF-4, 33-2-CF-1 through CF-10, 33-3-CF-1 through CF-17, 33-4-CF-1, and 33A-CF-1 through CF-6.

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Table 1

General Electric Company
Pittsfield, Massachusetts

Building 34 Brownfields Sampling Program

Summary of Building Material Characterization Data

Sample ID / Date Collected	TCLP Regulatory Limits	34-TCLP-CF-1 9/15/99	34-TCLP-CB-1 9/15/99
Volatile Organics			
1,1-Dichloroethene	0.7	ND(0.10)	ND(0.10)
1,2-Dichloroethene	0.5	ND(0.10)	ND(0.10)
2-Butanone	200	ND(0.20)	ND(0.20)
Benzene	0.5	ND(0.10)	ND(0.10)
Carbon Tetrachloride	0.5	ND(0.10)	ND(0.10)
Chlorobenzene	100	ND(0.10)	ND(0.10)
Chloroform	6	ND(0.10)	ND(0.10)
Tetrachloroethene	0.7	ND(0.10)	ND(0.10)
Trichloroethene	0.5	ND(0.10)	ND(0.10)
Vinyl Chloride	0.2	ND(0.10)	ND(0.10)
Semivolatile Organics			
1,4-Dichlorobenezene	7.5	ND(0.05)	ND(0.05)
2,4,5-Trichlorophenol	400	ND(0.05)	ND(0.05)
2,4,6-Trichlorophenol	2	ND(0.05)	ND(0.05)
2,4-Dinitrotoluene	0.13	ND(0.05)	ND(0.05)
Total Cresols	200	ND(0.05)	ND(0.05)
Hexachlorobenzene	0.13	ND(0.05)	ND(0.05)
Hexachlorobutadiene	0.5	ND(0.05)	ND(0.05)
Hexachloroethane	3	ND(0.05)	ND(0.05)
Nitrobenzene	2	ND(0.05)	ND(0.05)
Pentachlorophenol	100	ND(0.05)	ND(0.05)
Pyradine	5	ND(0.05)	ND(0.05)
Inorganics			
Arsenic	5	ND(0.50)	ND(0.50)
Barium	100	ND(10.0)	ND(10.0)
Cadmium	1	ND(1.0)	ND(1.0)
Chromium	5	ND(0.50)	ND(0.50)
Lead	5	ND(0.50)	ND(0.50)
Mercury	0.2	ND(0.020)	ND(0.020)

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Table 1

General Electric Company
Pittsfield, Massachusetts

Building 34 Brownfields Sampling Program

Summary of Building Material Characterization Data

Sample ID	TCLP Regulatory Limits	34-TCLP-CF-1	34-TCLP-CB-1
Date Collected		9/15/99	9/15/99
Inorganics (con't)			
Selenium	1	ND(1.0)	ND(1.0)
Silver	5	ND(0.50)	ND(0.50)
Ignitability	Not Applicable[4]	Negative	Negative
Reactive Cyanide	Not Applicable[4]	ND	ND
Reactive Sulfide	Not Applicable[4]	ND	ND
pH	Not Applicable[4]	12.3	12.3

Notes:

1. **Results are presented in milligrams per liter (mg/L).**
2. **Samples were collected by Blasland, Bouck & Lee, Inc., and were submitted to CT&E Environmental Services, Inc. for analysis of TCLP.**
3. **ND-Analyte was not detected. The number in parentheses is the associated quantitation limit for volatiles and semivolatiles and the associated detection limit for other constituents**
4. **The criteria for determining if a solid waste exhibits the characteristics of a hazardous waste include the following:**

   Ignitability: **flashpoint <60°C, 140°F**
   Corrosivity: **pH below 2 or above 12.5 Standard Units (S.U.)**
   Reactivity: **No numeric regulatory criteria**

5. **CF - Concrete Floor. Field composite of all concrete floor samples in Building 34.**
   CB - Cinder Block Wall. Field composite of all cinder block wall samples in Buidling 34.

BUILDING 34 SAMPLING PROGRAM

THIRD ANGLE PROJECTION

K-9254434

FLOOR PLAN BLDG. -34-

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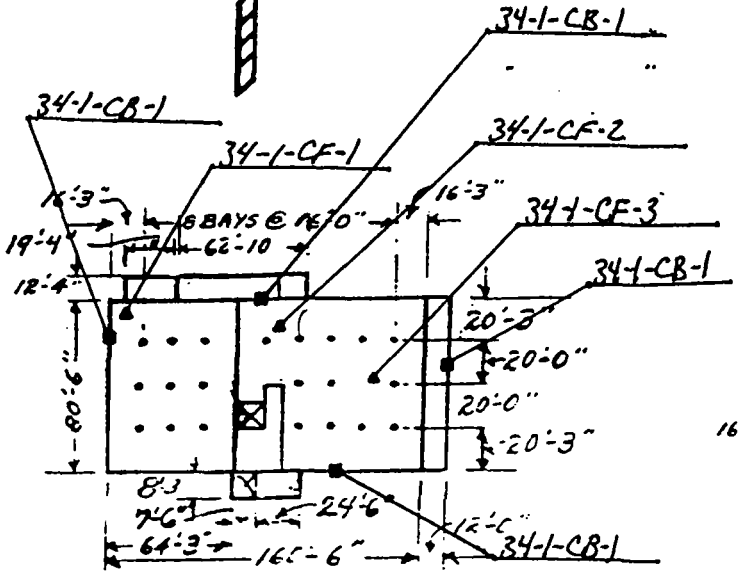
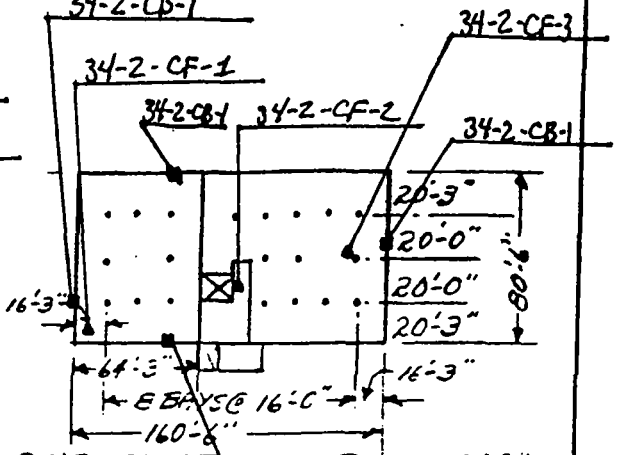
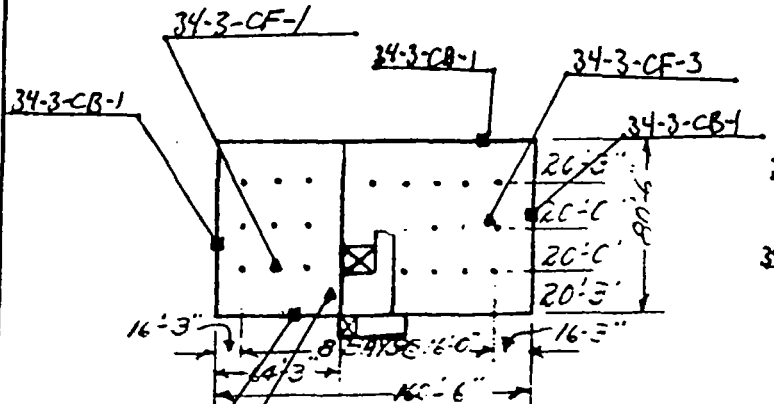
TOTAL FLOOR AREA	53,600± Sq. ft.
1ST. FL.	14,650± " "
2ND. FL.	12,690± " "
3RD. FL.	12,690± " "
4TH. FL.	12,690± " "
MEZZ.	590± " "
PENT. H.	290± " "



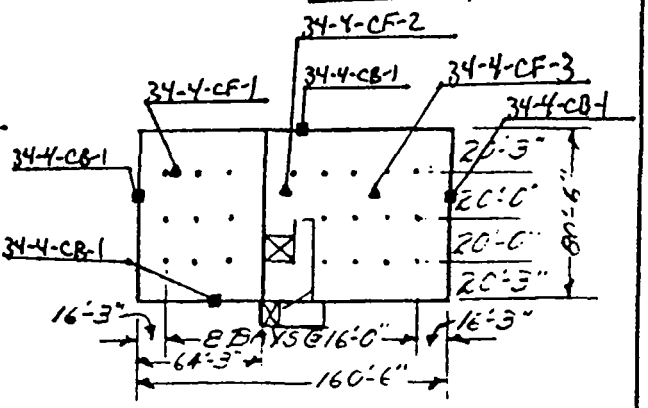
1ST. FLOOR HD. ROOM 13'-9"



2ND. FLOOR HD. ROOM 9'-9"

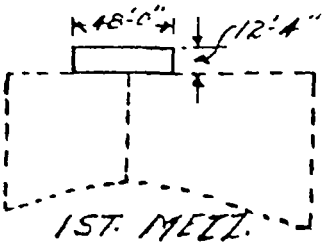


3RD. FLOOR HD. ROOM 9'-9"



4TH. FLOOR HD. ROOM 9'-9"

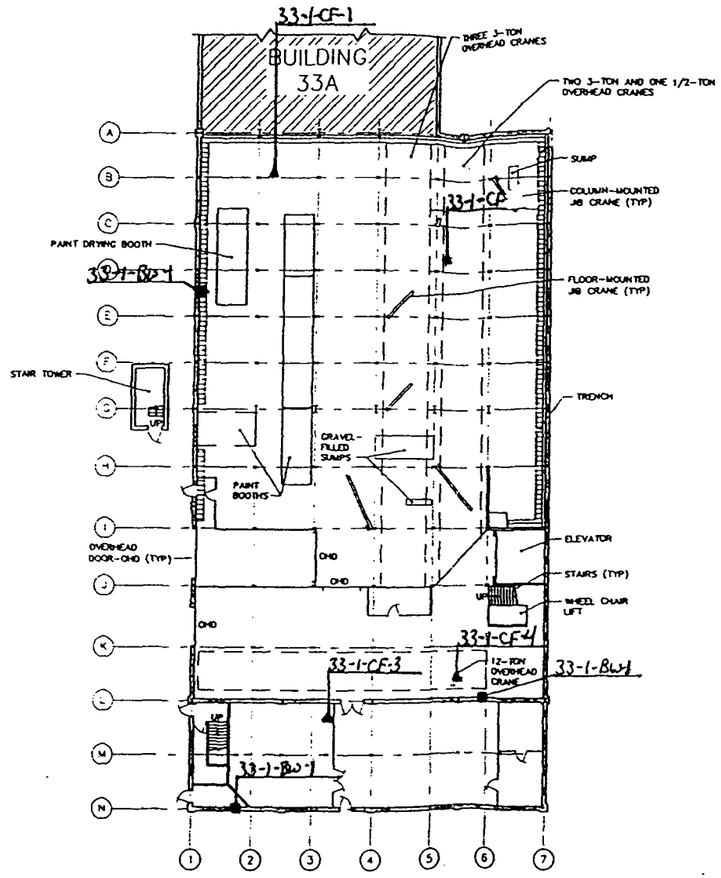
(1) DISCRETE IN PENT HOUSE



1ST. MEZZ.

K-9254434

1	5-17-66	MADE BY Leclair 4-20-66	INSPECTED BY Ray 10-4-66	
REVISIONS		GENERAL ELECTRIC BIRTLEY WORKS	K-9254434 SHEET NO. 1 CONT. ON SHEET 2	PRINTS TO



FIRST FLOOR PLAN

GENERAL NOTES:

1. DRAWING IS BASED ON A DRAWING ENTITLED "KEY PLAN FOR BUILDINGS 33, 33-A, 33-E" PREPARED IN OCTOBER 1914 (NAME OF PREPARER UNREADABLE) AND FIELD OBSERVATIONS MADE BY BLASLAND, BOUCK & LEE, INC. DURING A SITE VISIT ON MARCH 10 AND 11, 1999.
2. ALL FEATURES AND LOCATIONS ARE APPROXIMATE.

0 20' 40'
APPROXIMATE SCALE

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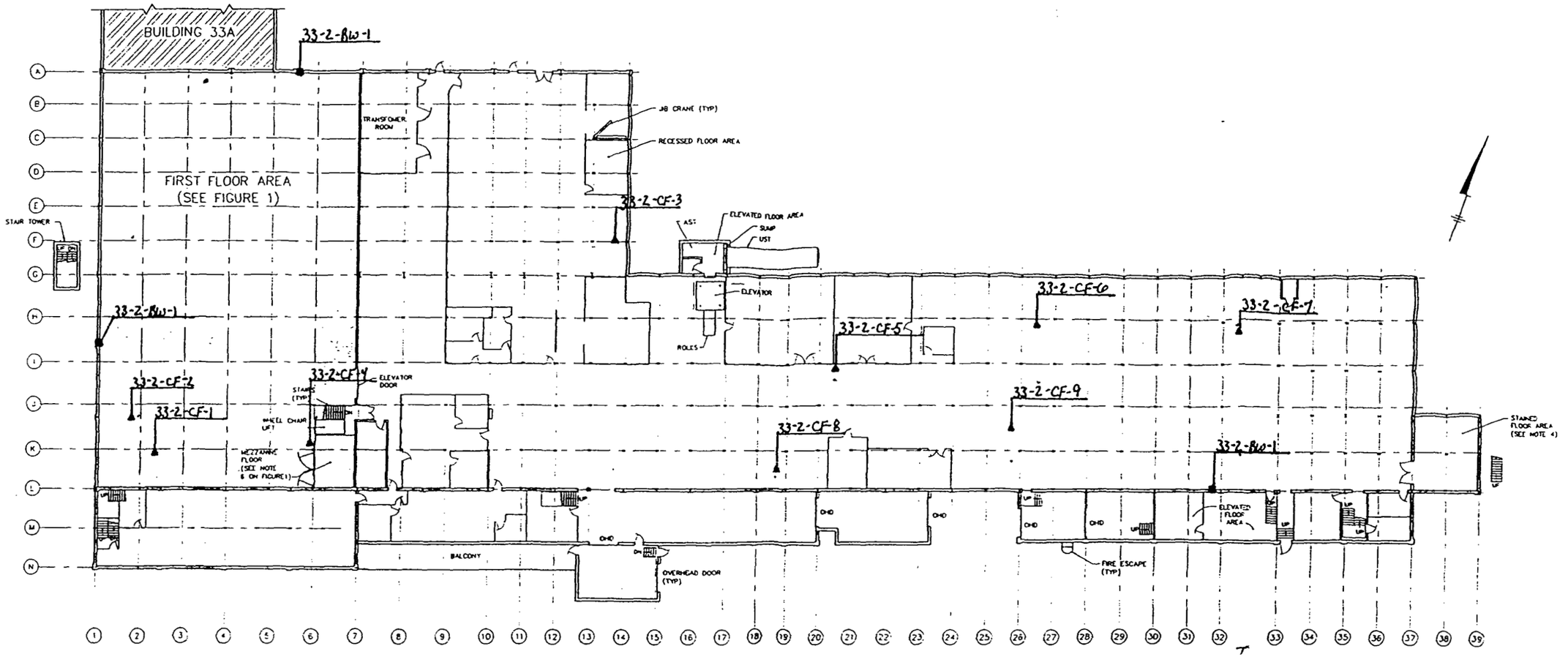
GENERAL ELECTRIC COMPANY
BROWNFIELDS PROGRAM
PITTSFIELD, MASSACHUSETTS

BUILDING 33
FIRST FLOOR PLAN

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

FIGURE 1

L: ON=*, OFF=REF
P: STD-PCP/DL
10/5/99 SYR-54-CAS DCC ROAD
10104003/10104537.DWG



SECOND FLOOR PLAN

DRAFT

GENERAL NOTES:

1. DRAWING IS BASED ON A DRAWING ENTITLED "KEY PLAN FOR BUILDINGS 33, 33-A, 33-B" PREPARED IN OCTOBER 1914 (NAME OF PREPARER UNREADABLE), AND FIELD OBSERVATIONS MADE BY BLASLAND, BOUCK & LEE, INC. DURING A SITE VISIT ON MARCH 10 AND 11, 1999.
2. ALL FEATURES AND LOCATIONS ARE APPROXIMATE.

0 20' 40'
APPROXIMATE SCALE

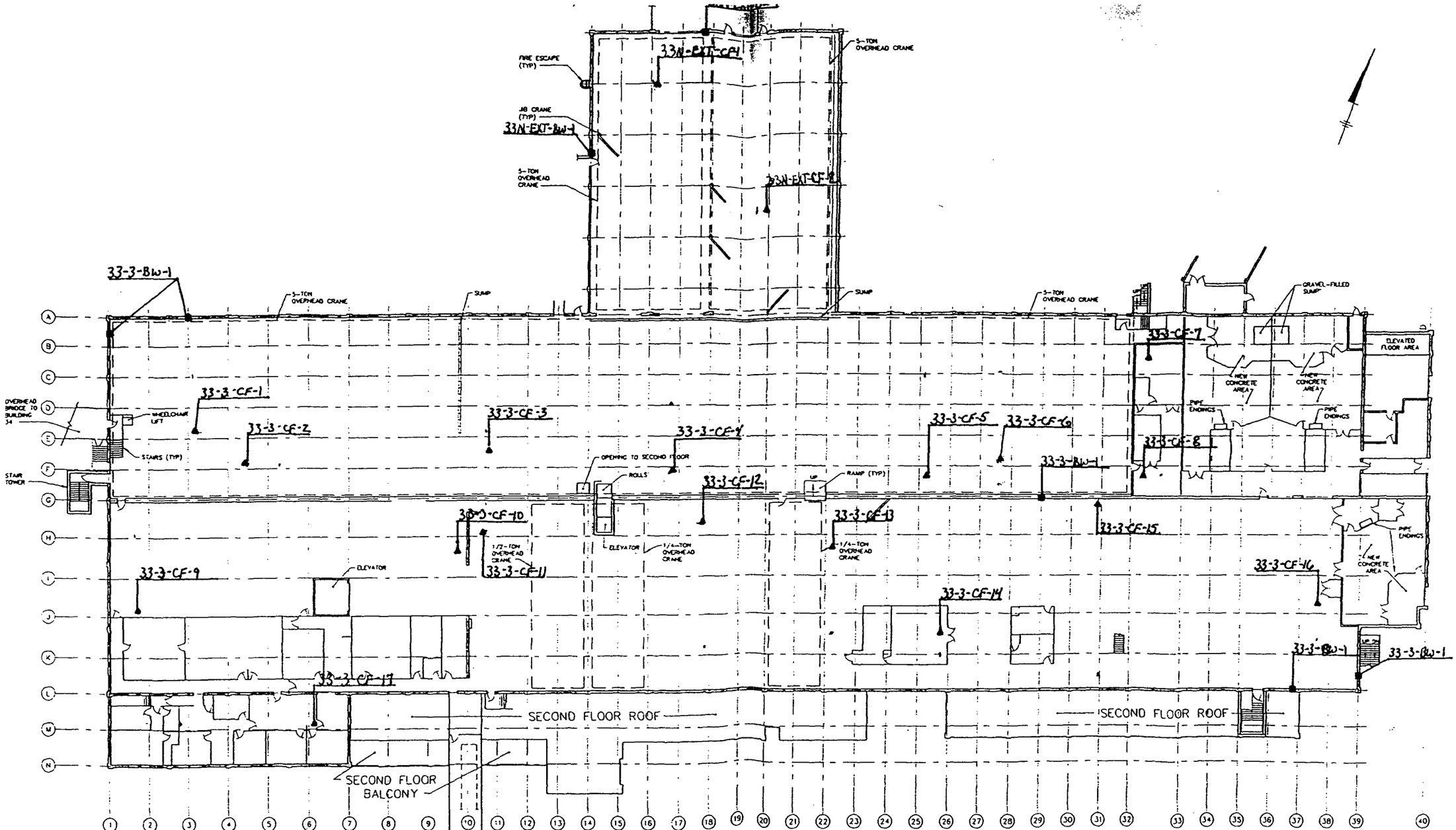
GENERAL ELECTRIC COMPANY
BROWNFIELDS PROGRAM
PITTSFIELD, MASSACHUSETTS

BUILDING 33
SECOND FLOOR PLAN

BLASLAND, BOUCK & LEE, INC.

FIGURE 2

L: ON=*, OFF=REF



THIRD FLOOR PLAN

GENERAL NOTES:

1. DRAWING IS BASED ON A DRAWING ENTITLED "KEY PLAN FOR BUILDINGS 33, 33-A, 33-B" PREPARED IN OCTOBER 1914 (NAME OF PREPARER UNREADABLE) AND FIELD OBSERVATIONS MADE BY BLASLAND, BOUCK & LEE, INC. DURING A SITE VISIT ON APRIL 15 AND 16, 1999.
2. ALL FEATURES AND LOCATIONS ARE APPROXIMATE.

0 20' 40'
APPROXIMATE SCALE

DRAFT

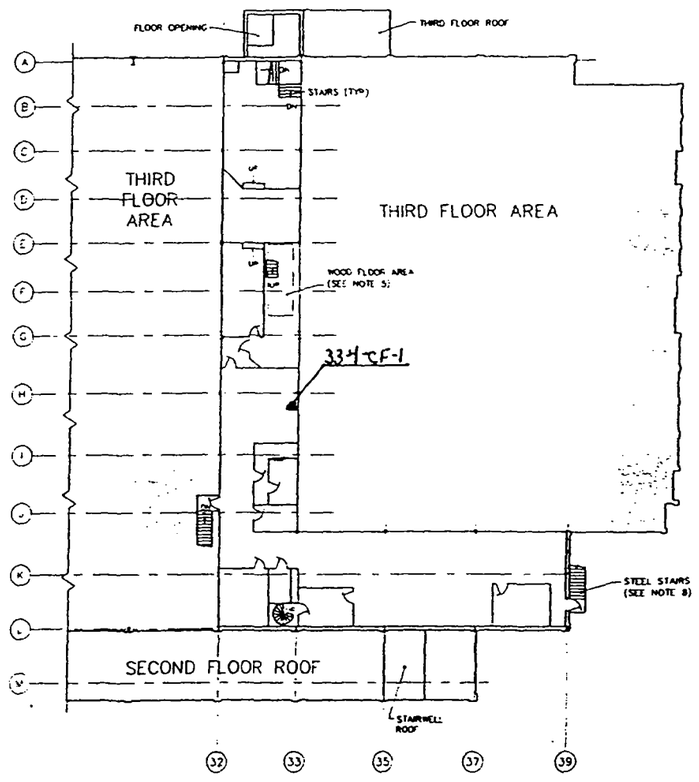
GENERAL ELECTRIC COMPANY
BROWNFIELDS PROGRAM
PITTSFIELD, MASSACHUSETTS

BUILDING 33
THIRD FLOOR PLAN

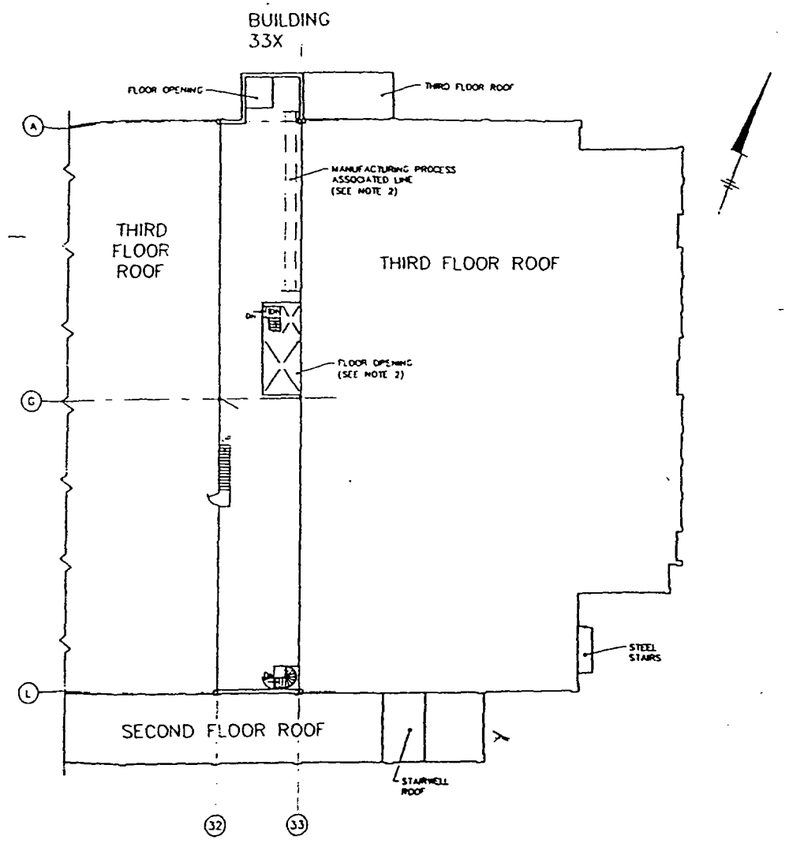
BBL BLASLAND, BOUCK & LEE, INC. engineers & scientists

FIGURE 3

L: ON=*, OFF=REF
A: STD-PCP/DL
10/5/99 STR-34-KLH DCC KMO
10104003/10104519.DWG



FOURTH FLOOR PLAN



FIFTH FLOOR PLAN

GENERAL NOTES:

1. DRAWING IS BASED ON FIELD OBSERVATIONS MADE BY BLASLAND, BOUCK & LEE, INC. DURING A SITE VISIT ON APRIL 16, 1999.
2. ALL FEATURES AND LOCATIONS ARE APPROXIMATE.

0 20' 40'
APPROXIMATE SCALE

DRAFT

GENERAL ELECTRIC COMPANY
BROWNFIELDS PROGRAM
PITTSFIELD, MASSACHUSETTS

BUILDING 33
FOURTH AND FIFTH FLOOR PLANS

RRI BLASLAND, BOUCK & LEE, INC.

FIGURE 4

L: ON=*, OFF=REF