

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

Transmitted Via Overnight Delivery

September 18, 2002

Mr. Bryan Olson EPA Project Coordinator U.S. Environmental Protection Agency EPA New England One Congress Street, Suite 1100 Boston, Massachusetts 02114-2023

Re: GE-Pittsfield/Housatonic River Site
East Street Area 1-North (GECD430)
Addendum to Pre-Design Investigation Work Plan

Dear Mr. Olson:

In May 2002, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a document entitled *Pre-Design Investigation Work Plan for the East Street Area 1-North Removal Action* (PDI Work Plan). That document was prepared in accordance with the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW). Subsequently, in a letter dated August 29, 2002, EPA provided conditional approval of the PDI Work Plan and required, among other things, that GE prepare an Addendum to the PDI Work Plan.

This letter serves as the Addendum to the PDI Work Plan and addresses each of the comments contained in EPA's conditional approval letter. In addition, this Addendum includes updated versions of Tables 3 and 4 and all figures from the PDI Work Plan, which have been revised based on EPA comments.

Modifications to the PDI Work Plan

- 1. GE has revised Figures 1 through 6 to reflect the agreed-upon location of the northern extent of the East Street Area 1-North Removal Action Area (RAA). As required in Condition No. 1 of EPA's conditional approval letter, and as shown on Figure 3, GE proposes to collect additional soil samples along the northern portion of the RAA, at locations generally corresponding to pre-design grid nodes RAA6-B7, RAA6-A11, and RAA6-C2. These proposed sampling locations have been modified from their grid nodes to take into account the existing building, the RAA boundary, and property ownership, respectively. The PDI Work Plan tables and figures have been updated to reflect these additional samples.
- 2. Condition No. 2 of EPA's conditional approval letter requires that GE summarize available information concerning prior uses and operations within the RAA, and provide a brief summary of investigatory history of the RAA. As described in the PDI Work Plan, the East Street Area 1-North RAA

is composed of eight separate tax parcels, as well as a City-owned property located along East Street. Based on the results of a property deed search conducted by GE in 1999 and a more recent review of property information at the Berkshire County Registry of Deeds, most of the parcels at this RAA have changed ownership over the past several decades. These ownership changes often reflected changes in property uses and operations. Based on information available to GE, the history of the ownership of and uses and operations at these parcels may be summarized as follows:

- Parcel J10-8-1 is currently owned by GE. GE has no information regarding the past ownership or uses of this parcel. Currently, this vacant parcel contains various subsurface piping associated with the East Street Area 1 Northside Oil Recovery System (Figure 2), discussed below.
- For Parcel J10-8-2, Ernesto Marchisio purchased the parcel in 1924 from Pittsfield Coal Gas Company. Subsequently, GE purchased the parcel in October 1979 and demolished the existing structure. The parcel is currently vacant and used for a small portion of the piping associated with the Northside Recovery System.
- Parcel J10-8-3 is owned by GE. GE has no information regarding the prior ownership and uses of this parcel. This parcel also currently contains certain components of the Northside Oil Recovery System.
- Parcels J10-8-4 and J10-8-5 were purchased by Vincenzo Bellora in 1929 and later sold to Corado Bellora in 1944. In 1955, oil was detected in the basement of the structure located on these parcels. In response, a number of investigations and remedial actions were performed that eventually lead to the installation of the current oil recovery system. In 1979, the Bellora property was purchased by GE, and the structure on the parcels was demolished. These parcels are also currently used for components of the Northside Oil Recovery System.
- Berkshire Street Railway purchased Parcel J10-8-6 in 1912 from George Cooper and used the existing building in the manufacture of railway cars. Grossmans (a retail building supply company) purchased the parcel from the Small Business Administration in 1958 and sold it to Engar Realty Trust in 1964. In 1964, the Pittsfield Fire Department issued a permit for the removal of two underground storage tanks (USTs) located within the existing building -- a 5,000-gallon gasoline UST and a 5,000-gallon diesel UST. GE purchased Parcel J10-8-6 from Engar Realty Trust in 1984 and currently leases the existing structure to Maxymillian Technologies, Inc., which uses that structure to store various construction equipment and supplies. In the future, GE intends to demolish the existing structure as part of its ongoing Brownfields program.
- Parcel K10-14-1 is owned by the K & K Realty Corporation. The existing building on this parcel was used as a Grossmans' retail store until the mid to late 1980s. Pittsfield Fire Department records indicate that permits were issued for the removal of two USTs from this parcel -- a 10,000-gallon fuel oil tank in 1960 and a 1,000-gallon gasoline UST in 1978. Currently, the existing building on this parcel is used as an office and support facility for a construction company.
- Parcel K11-10-15 is a railroad right-of-way. The Berkshire County Registry of Deeds lists the owner as Penn Central Company.

Investigative activities at this RAA date back to the initial discovery of oil in the basement of the building on the Bellora property, as discussed above. Subsequently, in the early 1980s, investigations focused on

light non-aqueous-phase liquid (LNAPL) present on top of the water table in this and adjacent areas. These efforts resulted in the installation and operation of the Northside Oil Recovery System and the related and ongoing monitoring and LNAPL recovery program. In addition to LNAPL-related activities, GE has also conducted soil and groundwater investigations within East Street Area 1-North. These activities have been conducted with the involvement and approval of EPA and/or Massachusetts Department of Environmental Protection (MDEP). The investigations performed in the 1990s were conducted pursuant to an Administrative Consent Order with MDEP and a Resource Conservation and Recovery Act (RCRA) Corrective Action Permit issued by EPA. A summary of historical groundwater investigations has been previously provided to EPA in a document entitled *Baseline Monitoring Program Proposal for Plant Site 1 Groundwater Management Area* (BBL, September 2000), while the PDI Work Plan summarized the prior soil investigations related to this RAA.

- 3. As required by Condition No. 3 of EPA's conditional approval letter, GE has adjusted the locations of proposed pre-design samples RAA6-E1, RAA6-E2, RAA6-E3, RAA6-E4, RAA6-E5, and RAA6-C4 to fall on or extremely close to their specific grid nodes. (Previously, these samples had been proposed at locations slightly offset from the actual grid nodes.) In addition, pre-design soil sample RAA6-C3 has been offset from its specific grid node to a location on GE-owned property. Figures 3 through 6 have been revised to reflect the adjusted sample locations.
- 4. EPA's Condition No. 4 required a modification of the pre-design sampling scope with respect to subsurface utilities. Specifically, grid location RAA6-D10 has been changed from a surface soil sample location to a soil boring location and grid location RAA6-D9 has been changed from a soil boring location to a surface soil sample location. Figures 3 through 6 and Tables 3 and 4 have been revised to reflect this change.

In addition, information regarding the depth of the utility trench beds, as required by Condition No. 4 of the EPA's conditional approval letter, has been obtained from the City of Pittsfield. From this inquiry, the sewer connections in the vicinity of the East Street Area 1–North RAA range between 6 and 10 feet below ground surface (bgs) and the water main in the same vicinity is 5.5 feet bgs. Based on this information, no additional utility-related changes to the scope of pre-design investigations are proposed.

5. Figures 4 through 6 and Table 4 has been revised to reflect modifications to the proposed Appendix IX+3 sampling, as required by Condition No. 5 of EPA's conditional approval letter. A summary of the changed Appendix IX+3 sample locations follows:

0- to 1-foot interval:

- RAA6-B17 was moved to RAA6-A16;
- RAA6-C5 was moved to RAA6-D5;
- RAA6-E5 was eliminated; and
- RAA6-A11 was added.

1- to 6-foot interval:

- RAA6-C17 (3- to 6-foot depth sample) was moved to RAA6-C15;
- RAA6-A11 (1- to 3-foot depth sample) was added;
- RAA6-C2 (1- to 6-foot depth sample) was added; and
- RAA6-D5 (1- to 6-foot depth sample) was added.

6- to 15-foot interval:

- RAA6-A17 was moved to RAA6-B15; and
- RAA6-C2 was added.
- 6. Consistent with Comment No. 6 of EPA's conditional approval letter, any modifications related to sample depths, locations and parameters that are identified in the field will be communicated to EPA's field representatives for concurrence, prior to sampling.
- 7. Consistent with Comment No. 7 of EPA's conditional approval letter, GE has modified the shading pattern on Figures 2 through 6 to better differentiate between paved and unpaved areas.
- 8. In response to Comment No. 8 of EPA's conditional approval letter, GE has further reviewed the existing PCB and non-PCB soil data presented in Appendix A of the PDI Work Plan. In all cases where an analyte was reported as non-detect (ND), no information on detection limits was available. Therefore, no additional reporting related to this situation can be provided.

Schedule

GE proposes to complete the investigations described in the PDI Work Plan and submit a Pre-Design Investigation Report for East Street Area 1-North within 6 months after EPA's approval of this Addendum to the PDI Work Plan, subject to possible changes due to delays in obtaining access permission or weather-related delays. In the event that delays to this proposed schedule are identified, GE will notify EPA and propose a revised schedule for completing the investigations and submitting a Pre-Design Investigation Report. With respect to access, if GE is unable to obtain access permission from property owners after using "best efforts" (as defined in the CD) to do so, it will so advise EPA and MDEP and seek their assistance in obtaining such access pursuant to Paragraph 60.f(i) of the CD.

If you have any questions or concerns regarding this Addendum, please contact Andrew Silfer or me.

Sincerely,

John F. Novotny, P.E.

Manager - Facilities and Brownfields Programs

Attachments

cc: Tim Conway, EPA* Holly Inglis, EPA Michael Nalipinski, EPA Rose Howell, EPA K.C. Mitkevicius, USACE Dawn Jamros, Weston Susan Steenstrup, MDEP Alan Weinberg, MDEP* Robert Bell, MDEP* Thomas Angus, MDEP* Susan Keydel, MDEP Nancy E. Harper, MA AG* Dale Young, MA EOEA* Mayor Sara Hathaway, City of Pittsfield Richard Scapin, Chair, Pittsfield City Council Pittsfield Department of Health Jeffrey Bernstein, Bernstein, Cushner & Kimmel Theresa Bowers, Gradient Michael Carroll, GE* Rod McLaren, Esq., GE* Andrew Silfer, GE James Nuss, BBL James Bieke, Esq., Shea & Gardner Property Owner - Parcel K10-14-1 **Public Information Repositories** GE Internal Repository (* w/out attachments)

Tables



GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

PRE-DESIGN INVESTIGATION WORK PLAN FOR THE EAST STREET AREA 1 - NORTH REMOVAL ACTION

SUMMARY OF PROPOSED GRID CHARACTERIZATION OF PCBs

GRID	SAMPLE						
COORDINATE	TYPE	0-1 ft	1-3 ft	3-6 ft	6-15 ft		
		P	AVED AREAS				
A13	EXISTING:						
	PROPOSED:	RAA6-A13	RAA6-A13	RAA6-A13	RAA6-A13		
A14	EXISTING:			- 18 30	4/4/4/4		
	PROPOSED:	RAA6-A14	54 (14)	Walter A	+ 10 m		
A15	EXISTING:				***		
	PROPOSED:	RAA6-A15	RAA6-A15	RAA6-A15	RAA6-A15		
A16	EXISTING:				第一领数据产业线组		
	PROPOSED:	RAA6-A16		-			
A17	EXISTING:						
	PROPOSED:	RAA6-A17	RAA6-A17	RAA6-A17	RAA6-A17		
B14	EXISTING:		All the second		- 1		
	PROPOSED:	RAA6-B14		700 SASS	salah da a dak		
В7	EXISTING:				**		
	PROPOSED:	RAA6-B7	RA	A6-B7	RAA6-B7		
B15	EXISTING:			\$3200 BERLEY BERLEY	2 4 - 192 (20)		
	PROPOSED:	RAA6-B15	25 89 C + 124	. 6224 W448 Str 4	7 PH 1414		
B16	EXISTING:		18.74 S. 18.84 S. 18.84	. 40 3000.30	14742 EE 4 4 No		
	PROPOSED:	RAA6-B16	2500.000 Carlo Carlo	- Anna - Tagana			
B17	EXISTING:		-109000 ,				
	PROPOSED:	RAA6-B17	3.00 miles		1 184 (a)		
C6	EXISTING:						
	PROPOSED:	RAA6-C6	RAA6-C6		RAA6-C6		
C14	EXISTING:			2			
	PROPOSED:	RAA6-C14	10 man 1 man	1000 P. C 100 M	1.000		
C15	EXISTING:		-				
	PROPOSED:	RAA6-C15	RAA6-C15	RAA6-C15	RAA6-C15		
C16	EXISTING:		图1000年度1000年	4.5	1. No. 18 - 18 19 19		
	PROPOSED:	RAA6-C16	16,000	AND AND A CENTER OF	A. 125.44		
C17	EXISTING:						
	PROPOSED:	RAA6-C17	RAA6-C17	RAA6-C17	RAA6-C17		
C18	EXISTING:						
	PROPOSED:	RAA6-C18	Maria - 1	2000 AND 400 AND 2000	14 THE 124		
D14	EXISTING:	*-	1917 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		10 10 10 10 10 10 10 10 10 10 10 10 10 1		
	PROPOSED:	RAA6-D14			——————————————————————————————————————		
D15	EXISTING:	ES1-14		1445042365			
	PROPOSED:	131-14	70 W 124 SE				
D16	EXISTING:	••	\$75,000 S - 400 St	and the state of t			
L/ 1 V	PROPOSED:	RAA6-D16	10.00 ACC 1		-		
D17	EXISTING:		V. C.		100-100-100-100-100-100-100-100-100-100		
1,011	PROPOSED:	RAA6-D17	All Consideration of the Constant of the Const	\$2.00 m \$2.00 m	1. 1. 1. 2. 2 ** official at		

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

PRE-DESIGN INVESTIGATION WORK PLAN FOR THE EAST STREET AREA 1 - NORTH REMOVAL ACTION

SUMMARY OF PROPOSED GRID CHARACTERIZATION OF PCBs

GRID	SAMPLE	38 P F F F F F F F F F F F F F F F F F F			
COORDINATE	TYPE	0-1 ft	1-3 ft	3-6 ft	6-15 ft
D18	EXISTING:			<u> </u>	16.002196
PROPOSED		RAA6-D18		100-100	The Conference
		UN	PAVED AREAS		
A11	EXISTING:				
	PROPOSED:	RAA6-A11	RAA6-A11	RAA6-A11	RAA6-A11
B18	EXISTING:	**	7 Y	10 m 20 m 20 m 100 m	ta den s a time
	PROPOSED:	RAA6-B18	-1		100 at - 250.
C2	EXISTING:				
	PROPOSED:	RAA6-C2 RAA6-C2		RAA6-C2	
C3	EXISTING:	ES1-7 ES1-7		1-7	
	PROPOSED:				RAA6-C3
C4	EXISTING:				**
	PROPOSED:	RAA6-C4	RAA	.6-C4	RAA6-C4
C5	EXISTING:		-		1
	PROPOSED:	RAA6-C5	RAA	.6-C5	RAA6-C5
D7	EXISTING:	+-			
	PROPOSED:	RAA6-D7	RAA6-D7	RAA6-D7	RAA6-D7
D8	EXISTING:				· · · · · · · · · · · · · · · · · · ·
	PROPOSED:	RAA6-D8	50 miles	400 -	All the second
D9	EXISTING:			1.5 4002 <u>2</u> 1.44.2036	GET WELL FOR
	PROPOSED:	RAA6-D9	age el est	111 116 - Carlos	112
D10	EXISTING:		-	14. and 14.	Sec. 19 - 19
	PROPOSED:	RAA6-D10	RAA6-D10	RAA6-D10	RAA6-D10
D11	EXISTING:			15 B. J 200 J. V	e
	PROPOSED:	RAA6-D11		Samuel -	385 Sec. 445 Sec. 9
D12	EXISTING:			40.00	ar in the same of
***************************************	PROPOSED:	RAA6-D12	- 25	C. S.C 18,640.	- ES
D13	EXISTING:		1 3 Y - 1 3 10 0	44.54.250	
	PROPOSED:	RAA6-D13		44.7559-000	Military - Silver
El	EXISTING:	ES1-9	ES1-9 ES1-9		
	PROPOSED:	**			RAA6-E1
E2	EXISTING:	***			
	PROPOSED:	RAA6-E2	RAA6-E2		RAA6-E2
E3	EXISTING:				
	PROPOSED:	RAA6-E3	RAA6-E3		RAA6-E3
E4	EXISTING:	ES1-8	ES1-8		
	PROPOSED:				RAA6-E4
E5	EXISTING:		-		
	PROPOSED:	RAA6-E5	RAA6-E5		RAA6-E5
E6	EXISTING:	**	-		
	PROPOSED:	RAA6-E6	RAA	RAA6-E6	

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

PRE-DESIGN INVESTIGATION WORK PLAN FOR THE EAST STREET AREA 1 - NORTH REMOVAL ACTION

SUMMARY OF PROPOSED GRID CHARACTERIZATION OF PCBs

NOTES:

- This table defines the soil sampling locations which will be utilized to satisfy grid-based sampling requirements for PCBs for the East Street Area 1-North pre-design investigation.
- 2. Other existing soil data will not be utilized in support of the pre-design sampling requirements, but may be used in the design of the Removal Action (as discussed in the text).
- 3. Shaded depth increments indicate that soil sampling is not required.
- 4. Existing samples are assumed to represent a grid node if they are located less than 50 feet from 100-foot grid nodes.
- 5. Existing sample depths are assumed to satisfy the depth interval requirements (i.e., either 0 to 1, 1 to 3, 3 to 6, or 6 to 15 feet, as applicable) if the existing depth(s) constitute at least 50% of the depth requirement. For example, existing data for 10- to 12-foot and 12- to 14-foot depths will satisfy the 6- to 15-foot requirements at a node, but existing data for the 10- to 12-foot depth alone will not.
- This table does not include all existing soil PCB samples collected at East Street Area 1-North. Refer to Table 1 for a complete list of all existing soil PCB samples.
- 7. -- = Not Applicable

TABLE 4

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

PRE-DESIGN INVESTIGATION WORK PLAN FOR THE EAST STREET AREA 1 - NORTH REMOVAL ACTION

PROPOSED SOIL SAMPLING LOCATIONS, DEPTHS, AND PARAMETERS

SAMPLE	GRID	SAMPLE	The State of the S		ANALYSES	(j. 1886) (j. 1886) o Si	
. ID	COORDINATE	DEPTH	PCBs	VOCs	SVOCs	INORGANICS	PCDDs/PCDF
			PAVE	D AREAS			
RAA6-A13	A13	0-1 ft	Х				-
		1-3 ft	Х	-]
		3-6 ft	Х				
		6-15 ft	х			-	
RAA6-A14	A14	0-1 ft	X				
RAA6-A15	A15	0-1 ft	X				-
		1-3 ft	х -	-	-		
		3-6 ft	X	X	x	Х	X
		6-15 ft	Х				
RAA6-A16	A16	0-1 ft	X	Х	Х	Х	X
RAA6-A17	A17	0-1 ft	X				
		1-3 ft	X	x	X	х	х
		3-6 ft	Х				
		6-15 ft	X				
RAA6-B7	B7	0-1 ft	Х				
	1	1-6 ft	X	-			
		6-15 ft	X				***
RAA6-B14	B14	0-1 ft	Х	Х	Х	Х	X
RAA6-B15	B15	0-1 ft	X				
		1-3 ft					
	1	3-6 ft					
		6-15 ft		X	х	х	x
RAA6-B16	B16	0-1 ft	X		-		**
RAA6-B17	B17	0-1 ft	X			+-	, married
RAA6-C6	C6	0-1 ft	Х	X	Х	Х	X
		1-6 ft	X	-			
		6-15 ft	X	X	X	Х	х
RAA6-C14	C14	0-1 ft	X			*	***
RAA6-C15	C15	0-1 ft	Х				
		1-3 ft	X				
		3-6 ft	X	x	х	x	x
		6-15 ft	X				
RAA6-C16	C16	0-1 ft	X		_		
RAA6-C17	C17	0-1 ft	Х	Х	Х	Х	X
		1-3 ft	X				
		3-6 ft	X				
		6-15 ft	X			***	***
RAA6-C18	C18	0-1 ft	X				
RAA6-D14	D14	0-1 ft	Х	Х	X	X	X
RAA6-D16	D16	0-1 ft	X				
RAA6-D17	D17	0-1 ft	X				**
RAA6-D18	D18	0-1 ft	X				**

TABLE 4

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

PRE-DESIGN INVESTIGATION WORK PLAN FOR THE EAST STREET AREA 1 - NORTH REMOVAL ACTION

PROPOSED SOIL SAMPLING LOCATIONS, DEPTHS, AND PARAMETERS

SAMPLE	GRID	SAMPLE			ANALYSES		
ID .	COORDINATE	DEPTH	PCBs	VOCs	SVOCs	INORGANICS	PCDDs/PCDI
			UNPAV	ED AREAS			
RAA6-A11	A11	0-1 ft	Х	X	X	X	X
		1-3 ft	X	X	X	x	х
		3-6 ft	X				
		6-15 ft	Х	-	-		
RAA6-B18	B18	0-1 ft	X				
RAA6-C2	C2	0-1 ft	X			-	
		1-6 ft	X	X	x	x	x
		6-15 ft	x	X	x	x	x
RAA6-C3	C3	6-15 ft	Х			†	
RAA6-C4	C4	0-1 ft	X	Х	X	х	X
		1-6 ft	х				
		6-15 ft	x			_	
RAA6-C5	C5	0-1 ft	X			 	
		1-6 ft	x				
		6-15 ft	x				
RAA6-D5	D5	0-1 ft		Х	X	Х	х
		1-6 ft	_	х	x	х	X
RAA6-D7	D7	0-1 ft	X	X	х	Х	Х
		1-3 ft	x	х	x	х	х
		3-6 ft	x				
	1	6-15 ft	x				
RAA6-D8	D8	0-1 ft	х				
RAA6-D9	D9	0-1 ft	х				
RAA6-D10	D10	0-1 ft	Х	X	X	Х	х
		1-3 ft	Х				
		3-6 ft	x			_	
		6-15 ft	x	x	x	х	х
RAA6-D11	D11	0-1 ft	Х			_	
RAA6-D12	D12	0-1 ft	X	Х	х	х	х
RAA6-D13	D13	0-1 ft	Х	**			
RAA6-E1	E1	0-1 ft		Х	х	Х	Х
		6-15 ft	х	х	х	х	x
RAA6-E2	E2	0-1 ft	X				
		1-6 ft	х				
		6-15 ft	х				
RAA6-E3	E3	0-1 ft	X	X	Х	X	х
		1-6 ft	Х	X	х	х	X
		6-15 ft	X				
RAA6-E4	E4	6-15 ft	X				
RAA6-E5	E5	0-1 ft	X	**			**
		1-6 ft	х				
		6-15 ft	Х				
RAA6-E6	E6	0-1 ft	X				**
		1-6 ft	x	***			
		6-15 ft	X				

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

PRE-DESIGN INVESTIGATION WORK PLAN FOR THE EAST STREET AREA 1 - NORTH REMOVAL ACTION

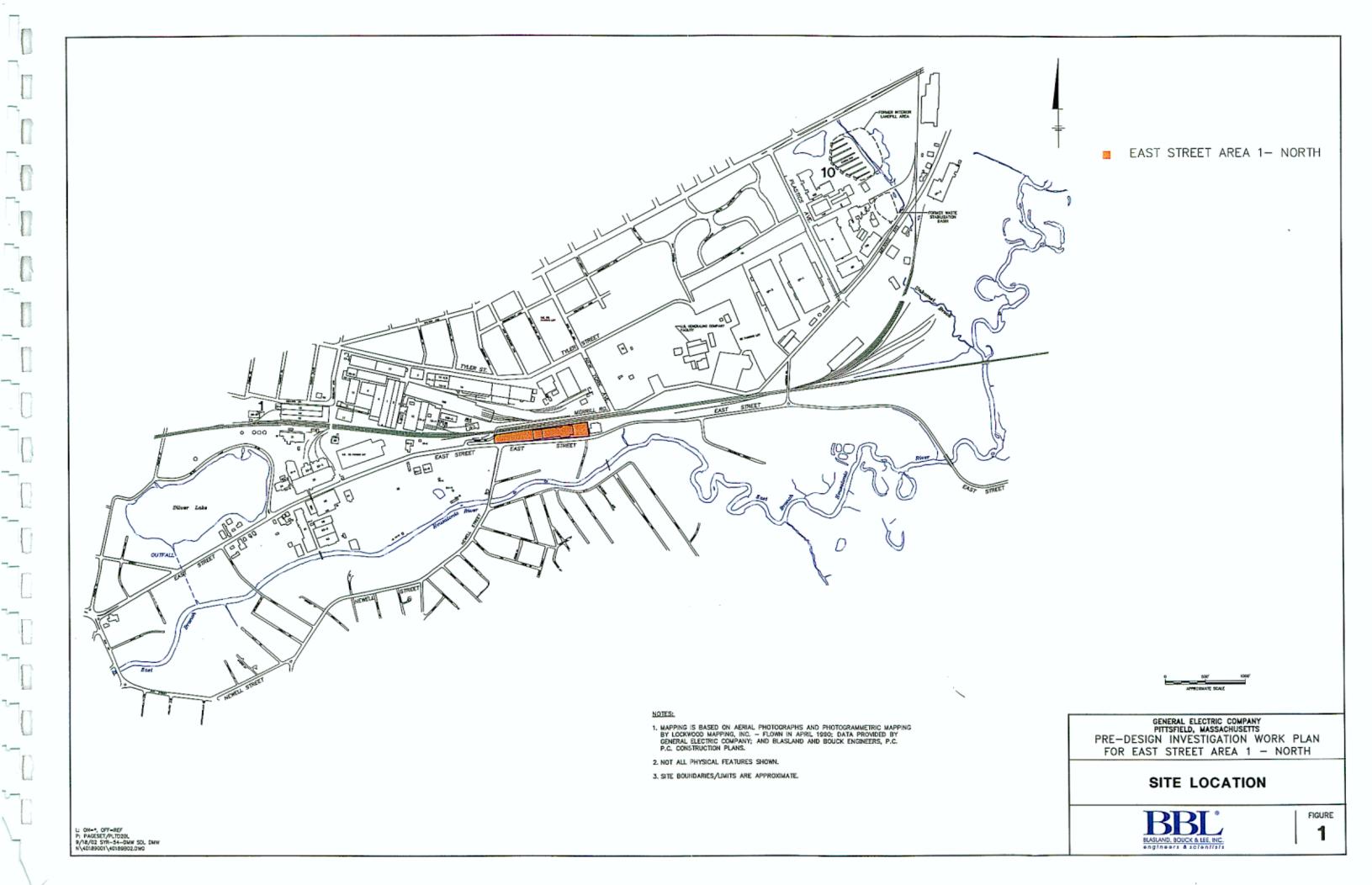
PROPOSED SOIL SAMPLING LOCATIONS, DEPTHS, AND PARAMETERS

NOTES:

- 1. This table identifies soil samples to be collected and the analyses to be performed as part of the pre-design investigation at East Street Area 1-North.
- 2. The Appendix IX+3 sample intervals shown above may be modified in the field based on the results of photoionization detector (PID) readings and visual observations at the time of sample collection.
- 3. -- = Not Applicable

Figures





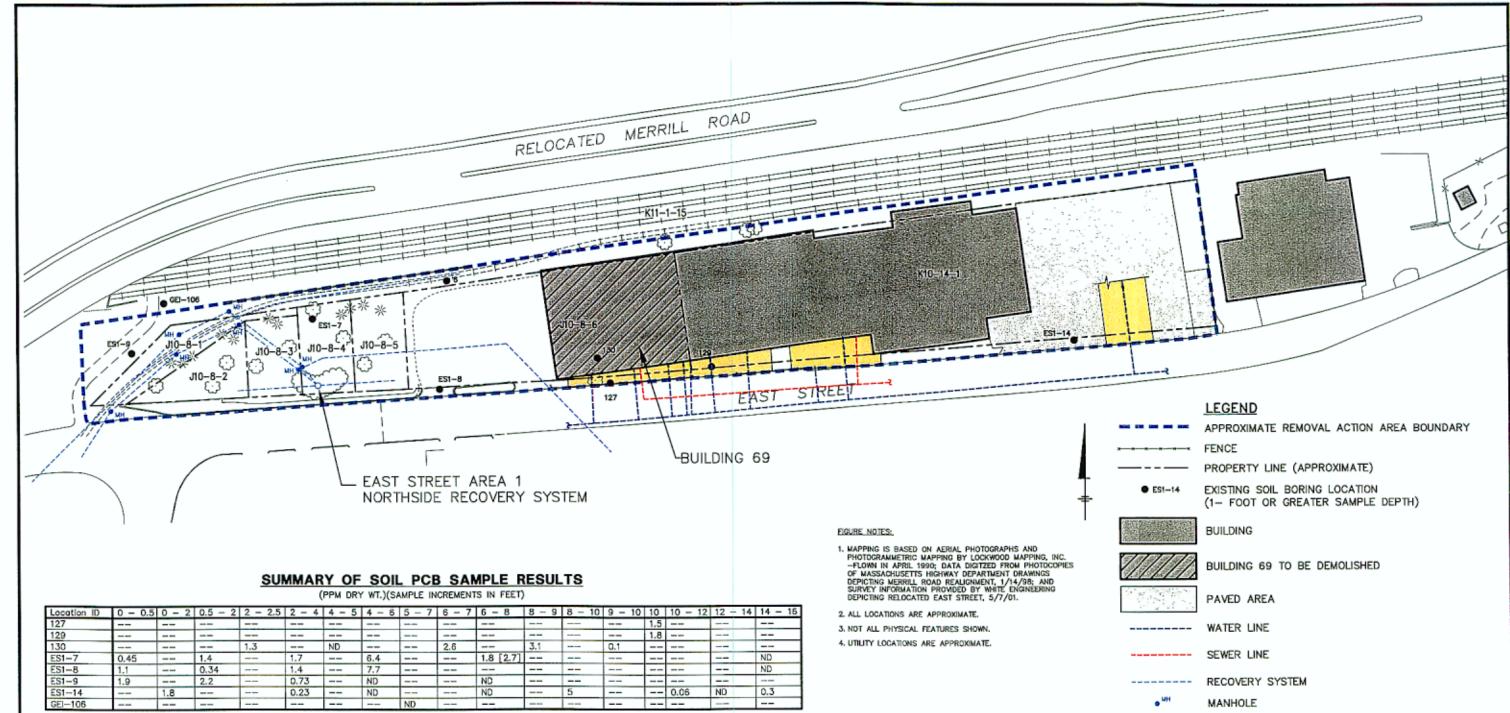


TABLE NOTES:

--- = No sample collected.

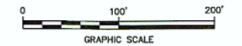
ND = Not detected.

[2.7] = Duplicate analysis result shown in brackets.

SUMMARY OF SOIL PCB SAMPLE RESULTS WITH UNKNOWN DEPTHS

(PPM DRY WT.)

Location ID	PCB Concentration
6	13





APPROXIMATE LOCATION OF BAND SURROUNDING SUBSURFACE UTILITIES (25 FEET WIDE ON EACH SIDE OF UTILITY)

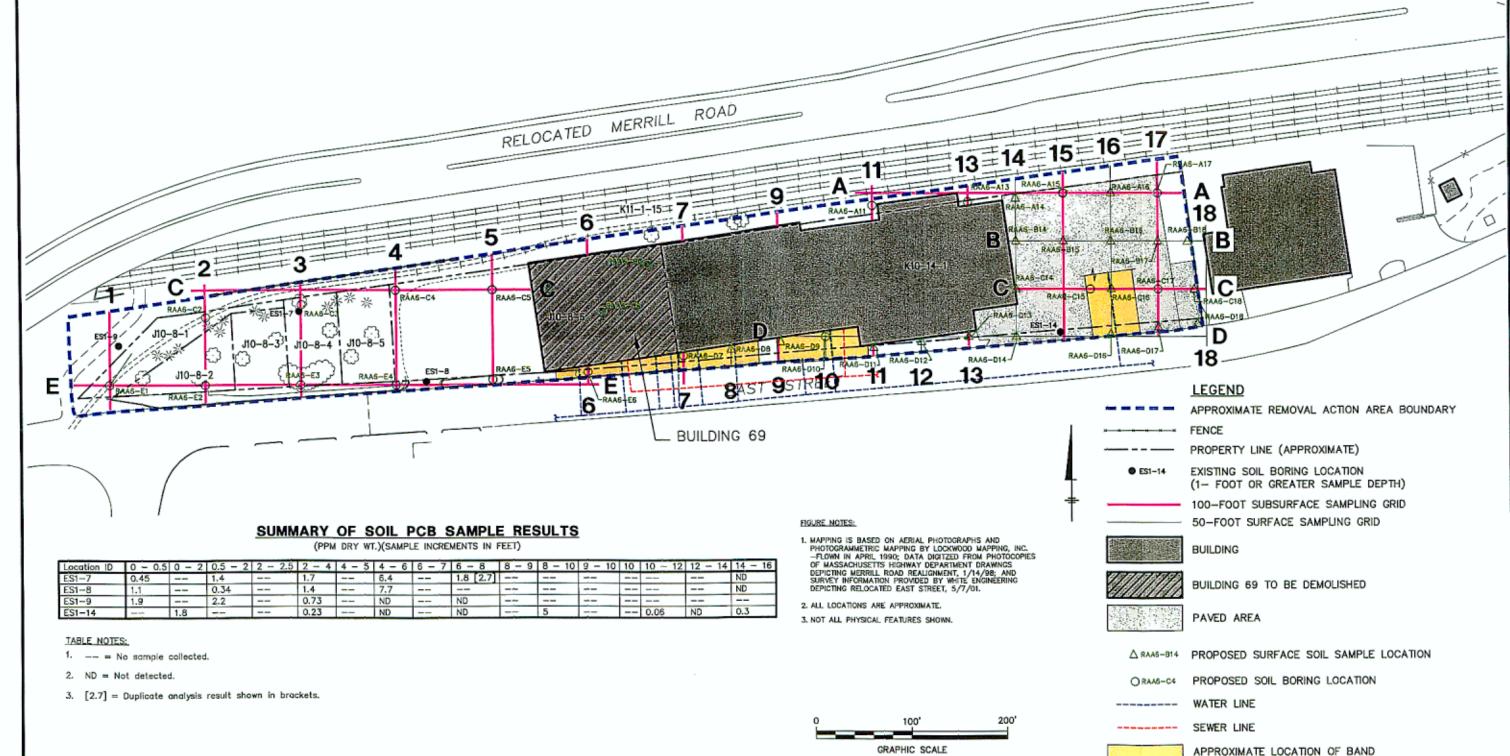
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
PRE-DESIGN INVESTIGATION WORK PLAN
FOR EAST STREET AREA 1 - NORTH

EXISTING SAMPLING LOCATIONS



FIGURE

X: 40189XD1,DWG L: ON=*, OFF=REF* P: PAGESET/PLT-BL 9/18/02 SYR-54-DMW SDL DXW N/40189001/40189B03,DWG



GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
PRE-DESIGN INVESTIGATION WORK PLAN
FOR EAST STREET AREA 1 - NORTH

PROPOSED PCB
CHARACTERIZATION LOCATIONS



SURROUNDING SUBSURFACE UTILITIES (25 FEET WIDE ON EACH SIDE OF UTILITY)

FIGURE 3

X: 40189X01.DWG L: ON=*,OFF=REF* P: PAGESET/PLT=BL 9/18/02 5*R=54=DHW SDL DHW N/40189001/40189B04.DWG

