



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Delivery

September 27, 2007

Mr. Dean Tagliaferro
U.S. Environmental Protection Agency
Region I – New England
10 Lyman Street, Suite 2
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
East Street Area 2-North (GECD140)
Building 100 Averaging Area Evaluation**

Dear Mr. Tagliaferro:

On May 25, 2007, the General Electric Company (GE) submitted to the United States Environmental Protection Agency (EPA) a document titled *Final Removal Design/Removal Action Work Plan Addendum for East Street Area 2-North* (Final Work Plan Addendum). That document included: 1) a summary of the supplemental soil investigations performed in the portion of Woodlawn Avenue (Woodlawn Avenue Area) that was added to the East Street Area 2-North Removal Action Area (RAA); 2) a description of GE's evaluation of the condition of the paved areas within the RAA; 3) revised removal design/removal action (RD/RA) evaluations for polychlorinated biphenyls (PCBs) and non-PCB constituents for the entire RAA, the portion of the RAA subject to future transfer to the Pittsfield Economic Development Authority (PEDA), and the Woodlawn Avenue Area alone; 4) modifications to the Final Work Plan in response to conditions provided by EPA in its January 16, 2007 and March 29, 2007 conditional approval letters for the Final RD/RA Work Plan and the Evaluation of Need for Additional Soil Investigations and Sampling Proposal – Woodlawn Avenue Portion of East Street Area 2-North RAA, respectively; and 5) a proposed schedule for future activities.

EPA provided conditional approval for the Final Work Plan Addendum in a letter dated August 20, 2007. In addition to providing comments related to the installation, repair, or replacement of pavement at East Street Area 2-North, that conditional approval letter required GE to provide two additional submittals to EPA. These submittals were: 1) a proposal for the modification of the spatial averaging areas for East Street Area 2-North to include a new averaging area representing the exposure area represented by the lease of property to the purchaser of GE Plastics, due 30 days from the effective date of the lease; and 2) a revised Post-Removal Site Control Plan, which is Appendix E to the *Final Removal Design/Removal Action Work Plan for East Street Area 2-North*, submitted in August 2006 (Final Work Plan), due fifteen days from the date of EPA's conditional approval letter. GE submitted the revised Post-Removal Site Control Plan to EPA on August 31, 2007. The remainder of this letter provides GE's proposal and evaluation of the new averaging area associated with the lease of a portion of East Street Area 2-North associated with the former GE Plastics business.

A. Building 100 Averaging Area

GE signed a lease for certain properties including Building 100, which lies within East Street Area 2-North, effective August 31, 2007. Pursuant to EPA'S August 20, 2007 conditional approval letter, GE proposes to create a new averaging area comprising the area leased to the purchaser of the former GE Plastics business (Building 100 Averaging Area). This averaging area is shown on Figure 1 and encompasses Building 100, the surrounding parking areas, and access routes leading to the building. For the Building 100 Averaging Area, GE has conducted evaluations related to PCBs and other non-PCB constituents listed in Appendix IX+3 of 40 CFR Part 264, plus three additional constituents – benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine (Appendix IX+3) in soil. The evaluations were performed to assess whether existing conditions within this averaging area meet the applicable Performance Standards set forth in the Consent Decree (CD) and *Statement of Work for Removal Actions Outside the River* (SOW) for East Street Area 2-North. However, as evaluations for the entire East Street Area 2-North RAA have already been performed and removal has been proposed, the evaluations performed for the Building 100 Averaging Area incorporate such remediation.

B. Summary of PCB and Non-PCB Evaluation Procedures

The PCB evaluations presented herein were performed in accordance with the procedures summarized in Section 3.2 of the *Conceptual Removal Design/Removal Action Work Plan for East Street Area 2-North* (Conceptual Work Plan), which were established in Attachment E to the SOW (Protocols for PCB Spatial Averaging), using the Performance Standards applicable to industrial areas within the GE Plant Site. The pertinent Performance Standards related to the presence of PCBs in soil within the Building 100 Averaging Area include the following spatial average PCB concentrations: 25 ppm in the top foot of the unpaved areas, 25 ppm in the top foot of soil (considering paved and unpaved portions together); and 200 ppm in the 1- to 6-foot depth increment. Further, if after incorporating any response actions for the uppermost six feet, the remaining spatial average PCB concentration in the 0- to 15-foot depth increment exceeds 100 ppm, an engineered barrier must be installed. Also, if an evaluation area is greater than 0.5 acre, as is the case with the Building 100 Averaging Area, the maximum PCB concentration in the top foot of unpaved soils within these areas must be less than 125 ppm.

Regarding non-PCB constituents, the evaluations presented herein for the Building 100 Averaging Area were generally performed in accordance with the evaluation procedures summarized in Section 3.3 of the Conceptual Work Plan, which were established in Attachment F to the SOW (Protocols for the Evaluation of Non-PCB Constituents in Soil), using the Performance Standards applicable to industrial areas within the GE Plant Site. As described in the Conceptual Work Plan, the pertinent Performance Standards related to the presence of non-PCB constituents in soil at East Street Area 2-North include the following:

- For dioxins and furans, total TEQ concentrations must be calculated using the Toxicity Equivalency Factors (TEFs) developed by the World Health Organization (WHO) (van den Berg J. et al., *Environ. Health Perspectives*, Vol. 106, No. 12, Dec. 1998). Either the maximum TEQ concentration or the 95% percent Upper Confidence Limit on the mean (95% UCL) of the TEQ data must be below certain PRGs developed or approved by EPA for dioxin/furan TEQs. These PRGs are 5 parts per billion (ppb) in the top foot of soil and 20 ppb in subsurface soil for industrial areas.

- For other non-PCB constituents, any combination of the following must be achieved: (1) maximum concentrations of individual constituents that do not exceed the Screening PRGs established or approved by EPA (as discussed below); or (2) for the remaining constituents, average concentrations that either: (a) do not exceed the MCP Method 1 soil standards (or Method 2 standards, if developed); or (b) are shown through an area-specific risk evaluation to have cumulative risk levels that do not exceed (after rounding) an excess lifetime cancer risk of 1×10^{-5} and a non-cancer Hazard Index of 1.

The one way in which the non-PCB evaluations presented herein differ from the evaluations procedures presented in the Conceptual Work Plan is that, pursuant to discussions between EPA and GE, the risk evaluation for the 0- to 15-foot depth increment documented herein was performed using the Utility Worker Scenario, rather than (as specified in the evaluation procedures presented in the Conceptual Work Plan) by comparing the average constituent concentrations for this depth increment to the MCP Upper Concentration Limits (UCLs). The evaluation procedures used for the Building 100 Averaging Area were the same as those used in the Final Work Plan Addendum, as conditionally approved by EPA.

C. Evaluation Results for the Building 100 Averaging Area

As previously indicated, GE presented the results of revised RD/RA evaluations for the entire East Street Area 2-North RAA in the Final Work Plan Addendum. The evaluations provided herein, however, were prepared only for the proposed Building 100 Averaging Area in light of the recent lease of that area.

PCB Evaluations

Since the Building 100 Averaging Area is greater than 0.5 acre in size, the first step in the evaluation process involves the identification of any soil samples in the top foot of unpaved areas containing PCB concentrations greater than 125 ppm, the applicable not-to-exceed (NTE) level. As previously indicated, remediation has already been proposed within portions of East Street Area 2-North, including the area now designated as the Building 100 Averaging Area, to address certain NTEs. Specifically, remediation was proposed in the Conceptual Work Plan Addendum to address unpaved soils in the 0- to 1-foot depth increment within the Building 100 Averaging Area associated with the following sampling locations: PS-W-94 (160 ppm), PS-W-95 (1,500 ppm), and PS-W-96 (540 ppm). As a result, the initial evaluations for the Building 100 Averaging Area took into account the previously-proposed removal for the soils associated with these sampling locations.

The next step in the PCB evaluation process involved the use of the available PCB soils data, taking into account the proposed NTE soil remediation described above, and spatial averaging procedures to calculate spatial average PCB concentrations for the 0- to 1-foot, 1- to 6-foot, and 0- to 15-foot depth increments. The following table presents the average PCB concentrations that were calculated for each depth increment within the Building 100 Averaging Area, together with references to the corresponding tables and figures, and the applicable Performance Standards:

Depth Increment	Table Reference	Figure Reference	Average PCB Concentration (ppm)	Performance Standard (ppm)
0 – 1' (Unpaved)	1	2	4.70	25
0 – 1' (Paved and Unpaved)	2	2	20.38	25
1 – 6'	3	3 - 7	18.83	200
0 – 15'	4	2 - 13	16.60	100

As indicated in the table above, the average PCB concentration for each depth increment, taking into account the previously-proposed NTE removals, is below the corresponding Performance Standard. Therefore, no further remediation is required to achieve the PCB Performance Standards applicable to the Building 100 Averaging Area.

Appendix IX+3 Evaluations – Existing Conditions

Consistent with the protocols established in the SOW and discussed in the Conceptual Work Plan, the maximum concentration for each detected non-PCB constituent (other than dioxin/furan TEQs) within the Building 100 Averaging Area was compared to its corresponding Screening PRG. Table 5 provides that comparison. As shown in that table, methylene chloride, benzo(a)pyrene and arsenic have maximum detected concentrations that exceed the Screening PRGs for these substances. Therefore, these constituents were retained for further evaluation (along with dioxin/furan TEQs).

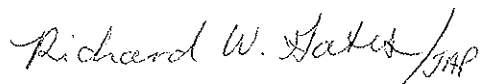
For these retained constituents, the next step in the non-PCB evaluation involved the comparison of average constituent concentrations (except for dioxin/furan TEQs) within the Building 100 Averaging Area to the applicable MCP Method 1 soil standards and comparison of maximum dioxin/furan TEQ concentrations to the applicable EPA PRGs. Tables 6 through 8 present the comparisons of the retained constituents to the applicable comparison criteria for the 0- to 1-foot, 1- to 6-foot, and 0- to 15-foot depth increments, respectively. As indicated in those tables, all dioxin/furan TEQs are below the applicable PRGs. In addition, the average concentrations for the other retained constituents are all less than the corresponding Method 1 soil standards, with the exception of methylene chloride in the 1- to 6-foot depth increment. As a result, GE performed an area-specific risk evaluation for the Building 100 Averaging Area, presented in Attachment A hereto. Similar risk evaluations performed for the East Street Area 2-North RAA in its entirety were presented in the Final Work Plan Addendum. Consistent with the results of the risk evaluation for the entire East Street Area 2-North RAA, the risk evaluation for the Building 100 Averaging Area indicates that, under existing conditions, both cancer risks and non-cancer hazards due to retained constituents in the 0- to 1-foot, 1- to 6-foot, and 0- to 15-foot depth increments are well below benchmarks specified in the SOW (i.e., an Excess Lifetime Cancer Risk (ELCR) of 1×10^{-5} and a Hazard Index (HI) of 1 for non-cancer effects) for the Building 100 Averaging Area. As a result of, no remediation is necessary to address non-PCB constituents at the Building 100 Averaging Area.

Proposed Remediation

The Building 100 Averaging Area, viewed on its own, does not require any remediation beyond that already required for the overall RAA. Based on the results of the evaluations presented above, GE proposes to conduct soil removal/replacement activities within the Building 100 Averaging Area in the East Street Area 2-North RAA, to the limits shown on Figures 14 and 15. These activities will involve the excavation and replacement of approximately 25 cubic yards of soil to address elevated PCB concentrations detected above the NTE level applicable to unpaved soils in the top foot of soil within this Averaging Area. Following the performance of the remediation previously described in the Final Work Plan Addendum, each of the areas evaluated separately and the entire East Street Area 2-North RAA will achieve applicable Performance Standards.

Please call me (413-448-5909) if you have any questions or comments regarding the information presented herein.

Sincerely,



Richard W. Gates
Remediation Project Manager

Enclosure

cc: Richard Hull, EPA
Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA*
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Public Information Repositories
GE Internal Repository

** without attachments*

Tables

**TABLE 1
POST-REMEDIATION CONDITIONS: 0- TO 1-FOOT DEPTH INCREMENT (UNPAVED)**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

0- TO 0.5-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per 1/2 Foot	Average PCB Conc. TIMES Total Volume
ES1-3	10	576	0 - 0.5	0.41	10.67	0.41	4.37
PS-W-92	113	1	0 - 0.5	4.5	0.02	4.5	0.09
PS-W-93	209, 210	302	0 - 0.5	14	5.59	14	78.25
PS-W-94	213	106	0 - 0.5	0.021	1.96	0.021	0.04
PS-W-95	215, 216	651	0 - 0.5	0.021	12.06	0.021	0.25
PS-W-96	218	145	0 - 0.5	0.021	2.68	0.021	0.06
RAA5-F16	266	13	0 - 0.5	0.019	0.24	0.019	0.00
RAA5-I17	296, 297	419	0 - 0.5	12.6	7.75	12.6	97.69
RAA5-I23	298, 299	3,014	0 - 0.5	3.7	55.82	3.7	206.54
RAA5-J21	316, 317	391	0 - 0.5	26	7.24	26	188.14
RAA5-J22	73	1,104	0 - 0.5	0.47	20.44	0.47	9.61
Totals:	--	6,721	--	--	124.46	--	585.04
						Volume Weighted Average:	4.70

0.5- TO 1-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per 1/2 Foot	Average PCB Conc. TIMES Total Volume
ES1-3	10	576	0.5 - 1	0.41	10.67	0.41	4.37
PS-W-92	113	1	0.5 - 1	4.5	0.02	4.5	0.09
PS-W-93	209, 210	302	0.5 - 1	14	5.59	14	78.25
PS-W-94	213	106	0.5 - 1	0.021	1.96	0.021	0.04
PS-W-95	215, 216	651	0.5 - 1	0.021	12.06	0.021	0.25
PS-W-96	218	145	0.5 - 1	0.021	2.68	0.021	0.06
RAA5-F16	266	13	0.5 - 1	0.019	0.24	0.019	0.00
RAA5-I17	296, 297	419	0.5 - 1	12.6	7.75	12.6	97.69
RAA5-I23	298, 299	3,014	0.5 - 1	3.7	55.82	3.7	206.54
RAA5-J21	316, 317	391	0.5 - 1	26	7.24	26	188.14
RAA5-J22	73	1,104	0.5 - 1	0.47	20.44	0.47	9.61
Totals:	--	6,721	--	--	124.46	--	585.04
						Volume Weighted Average:	4.70

SUMMARY - 0- TO 1-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	6,721	--	--	248.92	--	1,170.09
						Volume Weighted Average:	4.70

Notes:

1. Polygon ID and area based on information shown on Figure 14. Existing conditions shown on Figure 2.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.
5. Shaded numbers in bold and italics represent the placement of clean backfill material following the performance of the proposed remediation. The backfill concentration corresponds to the average PCB concentration as presented in the CD Sites Backfill Data Set.

**TABLE 2
POST REMEDIATION CONDITIONS: 0- TO 1-FOOT DEPTH INCREMENT (PAVED AND UNPAVED)**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

0- TO 0.5-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per 1/2 Foot	Average PCB Conc. TIMES Total Volume
100-8	77	11,758	0 - 0.5	2.2	217.75	2.2	479.05
ES1-3	10, 88	733	0 - 0.5	0.41	13.57	0.41	5.56
ES1-10	80	162	0 - 0.5	0.52	2.99	0.52	1.56
ES1-11	81	3,787	0 - 0.5	1.7	70.13	1.7	119.22
ES1-28	86	13,247	0 - 0.5	7	245.32	7	1,717.21
PS-W-81	354	366	0 - 0.5	7	6.77	7	47.39
PS-W-92	113	1	0 - 0.5	4.5	0.02	4.5	0.09
PS-W-93	114, 209, 210	3,776	0 - 0.5	14	69.93	14	979.05
PS-W-94	213	106	0 - 0.5	0.021	1.96	0.021	0.04
PS-W-94	355, 356	1,143	0 - 0.5	160	21.16	160	3,385.78
PS-W-95	215, 216	651	0 - 0.5	0.021	12.06	0.021	0.25
PS-W-95	357, 358	1,558	0 - 0.5	1,500	28.85	1500	43,270.00
PS-W-96	218	145	0 - 0.5	0.021	2.68	0.021	0.06
PS-W-96	115	1,701	0 - 0.5	540	31.49	540	17,006.40
PS-W-97	359, 360	1,696	0 - 0.5	160	31.41	160	5,025.27
PS-W-98	116	2,133	0 - 0.5	8.6	39.49	8.6	339.63
PS-W-100	91	4,000	0 - 0.5	6.9	74.08	6.9	511.13
RAA5-C28	124	2,508	0 - 0.5	0.072	46.44	0.072	3.34
RAA5-C29	375	471	0 - 0.5	0.207	8.71	0.207	1.80
RAA5-D15S	129	588	0 - 0.5	2.1	10.89	2.1	22.86
RAA5-D28	132	1,910	0 - 0.5	0.59	35.37	0.59	20.87
RAA5-E10	382, 383	6,226	0 - 0.5	1.48	115.29	1.48	170.63
RAA5-E12	138	13,164	0 - 0.5	4.4	243.77	4.4	1,072.59
RAA5-E29	389	5,727	0 - 0.5	0.428	106.06	0.428	45.39
RAA5-F9	394	1,663	0 - 0.5	0.57	30.80	0.57	17.56
RAA5-F16	266, 391, 392	19,008	0 - 0.5	0.019	351.99	0.019	6.69
RAA5-F30	147	4,396	0 - 0.5	8.8	81.41	8.8	716.41
RAA5-G12	152	10,110	0 - 0.5	0.228	187.23	0.228	42.69
RAA5-G18	153	17,629	0 - 0.5	0.48	326.46	0.48	156.70
RAA5-H20	159	12,679	0 - 0.5	2.65	234.80	2.65	622.21
RAA5-H22	160	13,103	0 - 0.5	2.22	242.64	2.22	538.67
RAA5-H25	161	5,342	0 - 0.5	2	98.93	2	197.86
RAA5-H26	162	8,721	0 - 0.5	4.3	161.51	4.3	694.48
RAA5-H28	163	6,441	0 - 0.5	8.2	119.27	8.2	978.02
RAA5-H29	164	5,102	0 - 0.5	0.49	94.48	0.49	46.29
RAA5-HI23	167	7,896	0 - 0.5	0.067	146.22	0.067	9.80
RAA5-I17	296, 297, 410	13,079	0 - 0.5	12.6	242.20	12.6	3,051.71
RAA5-I23	168, 298, 299	12,057	0 - 0.5	3.7	223.27	3.7	826.10
RAA5-I25	169	262	0 - 0.5	2.31	4.86	2.31	11.22
RAA5-J16	418	6,071	0 - 0.5	10.9	112.42	10.9	1,225.38
RAA5-J18	422	4,727	0 - 0.5	0.42	87.55	0.42	36.77
RAA5-J19	171	7,182	0 - 0.5	41	133.00	41	5,452.90
RAA5-J21	172, 316, 317	8,746	0 - 0.5	26	161.96	26	4,210.87
RAA5-J22	73, 173	2,026	0 - 0.5	0.47	37.52	0.47	17.63
RAA5-JK20	177	2,918	0 - 0.5	0.7	54.04	0.7	37.83
Totals:	--	246,711	--	--	4,568.72	--	93,122.95
						Volume Weighted Average:	20.38

**TABLE 2
POST REMEDIATION CONDITIONS: 0- TO 1-FOOT DEPTH INCREMENT (PAVED AND UNPAVED)**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

0.5- TO 1-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per 1/2 Foot	Average PCB Conc. TIMES Total Volume
100-8	77	11,758	0.5 - 1	2.2	217.75	2.2	479.05
ES1-3	10, 88	733	0.5 - 1	0.41	13.57	0.41	5.56
ES1-10	80	162	0.5 - 1	0.52	2.99	0.52	1.56
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ES1-28	86	13,247	0.5 - 1	7	245.32	7	1,717.21
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PS-W-93	114, 209, 210	3,776	0.5 - 1	14	69.93	14	979.05
PS-W-94	213	106	0.5 - 1	0.021	1.96	0.021	0.04
PS-W-94	355, 356	1,143	0.5 - 1	160	21.16	160	3,385.78
PS-W-95	215, 216	651	0.5 - 1	0.021	12.06	0.021	0.25
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PS-W-96	218	145	0.5 - 1	0.021	2.68	0.021	0.06
PS-W-96	115	1,701	0.5 - 1	540	31.49	540	17,006.40
PS-W-97	359, 360	1,696	0.5 - 1	160	31.41	160	5,025.27
PS-W-98	116	2,133	0.5 - 1	8.6	39.49	8.6	339.63
PS-W-100	91	4,000	0.5 - 1	6.9	74.08	6.9	511.13
RAA5-C28	124	2,508	0.5 - 1	0.072	46.44	0.072	3.34
RAA5-C29	375	471	0.5 - 1	0.207	8.71	0.207	1.80
RAA5-D15S	129	588	0.5 - 1	2.1	10.89	2.1	22.86
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RAA5-E10	382, 383	6,226	0.5 - 1	1.48	115.29	1.48	170.63
RAA5-E12	138	13,164	0.5 - 1	4.4	243.77	4.4	1,072.59
RAA5-E29	389	5,727	0.5 - 1	0.428	106.06	0.428	45.39
RAA5-F9	394	1,663	0.5 - 1	0.57	30.80	0.57	17.56
RAA5-F16	266, 391, 392	19,008	0.5 - 1	0.019	351.99	0.019	6.69
RAA5-F30	147	4,396	0.5 - 1	8.8	81.41	8.8	716.41
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RAA5-H20	159	12,679	0.5 - 1	2.65	234.80	2.65	622.21
RAA5-H22	160	13,103	0.5 - 1	2.22	242.64	2.22	538.67
RAA5-H25	161	5,342	0.5 - 1	2	98.93	2	197.86
RAA5-H26	162	8,721	0.5 - 1	4.3	161.51	4.3	694.48
RAA5-H28	163	6,441	0.5 - 1	8.2	119.27	8.2	978.02
RAA5-H29	164	5,102	0.5 - 1	0.49	94.48	0.49	46.29
RAA5-HI23	167	7,896	0.5 - 1	0.067	146.22	0.067	9.80
RAA5-I17	296, 297, 410	13,079	0.5 - 1	12.6	242.20	12.6	3,051.71
RAA5-I23	168, 298, 299	12,057	0.5 - 1	3.7	223.27	3.7	826.10
RAA5-I25	169	262	0.5 - 1	2.31	4.86	2.31	11.22
RAA5-J16	418	6,071	0.5 - 1	10.9	112.42	10.9	1,225.38
RAA5-J18	422	4,727	0.5 - 1	0.42	87.55	0.42	36.77
RAA5-J19	171	7,182	0.5 - 1	41	133.00	41	5,452.90
RAA5-J21	172, 316, 317	8,746	0.5 - 1	26	161.96	26	4,210.87
RAA5-J22	73, 173	2,026	0.5 - 1	0.47	37.52	0.47	17.63
RAA5-JK20	177	2,918	0.5 - 1	0.7	54.04	0.7	37.83
Totals:	--	246,711	--	--	4,568.72	--	93,122.95
						Volume Weighted Average:	20.38

SUMMARY - 0- TO 1-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	246,711	--	--	9,137.45	--	186,245.90
						Volume Weighted Average:	20.38

Notes:

1. Polygon ID and area based on information shown on Figure 14. Existing conditions shown on Figure 2.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.
5. Shaded numbers in bold and italics represent the placement of clean backfill material following the performance of the proposed remediation. The backfill concentration corresponds to the average PCB concentration as presented in the CD Sites Backfill Data Set.

**TABLE 3
EXISTING CONDITIONS: 1- TO 6-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

1- TO 2-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
95-20	15	5,911	1 - 2	5.7	218.94	5.7	1,247.97
100-1	1	2,722	1 - 2	2.7	100.81	2.7	272.18
100-4	5	3,230	1 - 2	0.025	119.61	0.025	2.99
100-5	6	2,552	1.2 - 2	50	94.53	50	4,726.61
100-6	7	1,724	1 - 2	0.39	63.83	0.39	24.90
100-7	8	2,137	1 - 2	1.9	79.15	1.9	150.39
100-8	9	3,892	1 - 2	2.2	144.14	2.2	317.10
100-9	10	2,130	1.5 - 2	0.86	78.89	0.86	67.84
100-10	2	1,261	1 - 2	12	46.71	12	560.48
100-11	3	2,458	1.5 - 2	0.74	91.03	0.74	67.37
100-12	4	2,044	1 - 2	2.1	75.70	2.1	158.98
ES1-3	28	730	1 - 2	0.41	27.05	0.41	11.09
ES1-10	16	162	1 - 2	0.52	5.98	0.52	3.11
ES1-11	17	3,787	1 - 2	1.7	140.26	1.7	238.45
ES1-28	26	9,685	1 - 2	7	358.69	7	2,510.80
PS-W-81	58	347	1 - 2	7	12.86	7	90.00
PS-W-92	62	1	1 - 2	4.5	0.04	4.5	0.18
PS-W-93	63	3,776	1 - 2	14	139.86	14	1,958.09
PS-W-94	64	1,248	1 - 2	160	46.24	160	7,397.93
PS-W-95	65	2,209	1 - 2	1,500	81.81	1500	122,716.11
PS-W-96	66	1,845	1 - 2	540	68.34	540	36,904.20
PS-W-97	67, 67a	1,696	1 - 2	160	62.82	160	10,050.55
PS-W-98	68	2,133	1 - 2	8.6	78.98	8.6	679.25
PS-W-100	34	4,000	1 - 2	6.9	148.15	6.9	1,022.27
RAA5-C14B	177	2,579	1 - 2	0.019	95.51	0.019	1.81
RAA5-C28	81	2,508	1 - 2	0.081	92.88	0.081	7.52
RAA5-C29	82	471	1 - 2	0.019	17.43	0.019	0.33
RAA5-D28	97	1,910	1 - 2	0.315	70.74	0.315	22.28
RAA5-D15B	179	491	1 - 2	0.4	18.19	0.4	7.28
RAA5-E10	181, 182	6,226	1 - 2	1.58	230.59	1.58	364.33
RAA5-E12	104	11,788	1 - 2	45	436.59	45	19,646.42
RAA5-E29	110	5,727	1 - 2	1.3	212.11	1.3	275.75
RAA5-F9	187	1,663	1 - 2	0.0185	61.60	0.0185	1.14
RAA5-F16	185, 186	17,540	1 - 2	0.0185	649.62	0.0185	12.02
RAA5-F30	118	4,396	1 - 2	1.065	162.82	1.065	173.40
RAA5-G12	123	9,961	1 - 2	0.25	368.94	0.25	92.23
RAA5-G18	124	17,629	1 - 2	0.031	652.92	0.031	20.24
RAA5-H20	133	12,679	1 - 2	0.87	469.59	0.87	408.54
RAA5-H22	134	8,469	1 - 2	11.6	313.68	11.6	3,638.68
RAA5-H25	135	5,342	1 - 2	0.014	197.86	0.014	2.77
RAA5-H26	136	8,708	1 - 2	0.086	322.51	0.086	27.74
RAA5-H28	137	6,438	1 - 2	0.4	238.43	0.4	95.37
RAA5-H29	138	5,102	1 - 2	0.03	188.96	0.03	5.67
RAA5-HI23	147	7,151	1 - 2	0.019	264.83	0.019	5.03
RAA5-I17	149	12,921	1 - 2	6	478.56	6	2,871.37
RAA5-I23	150	11,373	1 - 2	180	421.22	180	75,820.13
RAA5-I25	151	263	1 - 2	0.163	9.73	0.163	1.59
RAA5-I27	153	32	1 - 2	0.019	1.19	0.019	0.02
RAA5-J16	192	827	1 - 2	0.0585	30.64	0.0585	1.79
RAA5-J18	156	4,727	1 - 2	0.095	175.09	0.095	16.63
RAA5-J19	157	7,182	1 - 2	11.6	266.00	11.6	3,085.55
RAA5-J21	158	5,982	1 - 2	1.2	221.57	1.2	265.89
RAA5-J22	159	2,026	1 - 2	0.135	75.04	0.135	10.13
RAA5-JK20	163	2,918	1 - 2	10.7	108.09	10.7	1,156.54
Totals:	--	246,709	--	--	9,137.36	--	299,217.05
						Volume Weighted Average:	32.75

**TABLE 3
EXISTING CONDITIONS: 1- TO 6-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

2- TO 3-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
95-20	16	5,911	2 - 3	4.1	218.94	4.1	897.66
100-1	1	2,061	2 - 3	1.3	76.32	1.3	99.21
100-2	5	1,352	2 - 3	0.47	50.08	0.47	23.54
100-3	6	915	2 - 2.5	2.4	33.88	2.95	99.93
			2.5 - 3	3.5			
100-4	7	3,230	2 - 3	0.025	119.61	0.025	2.99
100-5	8	2,428	2 - 3	3.8	89.94	3.8	341.79
100-6	9	1,466	2 - 3	0.025	54.31	0.025	1.36
100-7	10	1,282	2 - 3	12	47.48	12	569.70
100-8	11	3,892	2 - 3	120	144.14	120	17,296.44
100-9	12	2,130	2 - 2.5	0.86	78.89	0.52	41.02
			2.5 - 3	0.18			
100-10	2	892	2 - 3	19	33.02	19	627.46
100-11	3	2,458	2 - 2.5	0.74	91.03	1.02	92.86
			2.5 - 3	1.3			
100-12	4	2,044	2 - 3	3.5	75.70	3.5	264.97
ES1-3	28	730	2 - 3	3.37	27.05	3.37	91.15
ES1-10	17	162	2 - 3	0.46	5.98	0.46	2.75
ES1-11	18	3,787	2 - 3	2.3	140.26	2.3	322.61
ES1-28	26	9,685	2 - 3	3.2	358.69	3.2	1,147.80
PS-W-82	57	137	2 - 3	1.7	5.07	1.7	8.62
PS-W-83	58	719	2 - 3	0.6	26.62	0.6	15.97
PS-W-84	59	297	2 - 3	0.18	11.00	0.18	1.98
PS-W-85	60	24	2 - 3	0.78	0.87	0.78	0.68
PS-W-92	67	1	2 - 3	0.58	0.04	0.58	0.02
PS-W-93	68	3,776	2 - 3	1.4	139.86	1.4	195.81
PS-W-94	69	1,248	2 - 3	1.7	46.24	1.7	78.60
PS-W-95	70	2,209	2 - 3	200	81.81	200	16,362.15
PS-W-96	71	1,845	2 - 3	36	68.34	36	2,460.28
PS-W-97	72, 72a	1,696	2 - 3	0.54	62.82	0.54	33.92
PS-W-98	73	2,133	2 - 3	0.11	78.98	0.11	8.69
PS-W-100	32	4,000	2 - 3	2.2	148.15	2.2	325.94
RAA5-C14B	183	2,579	2 - 3	0.019	95.51	0.019	1.81
RAA5-C28	86	2,508	2 - 3	0.081	92.88	0.081	7.52
RAA5-C29	87	471	2 - 3	0.019	17.43	0.019	0.33
RAA5-D15B	185	491	2 - 3	0.4	18.19	0.4	7.28
RAA5-D28	102	1,910	2 - 3	0.315	70.74	0.315	22.28
RAA5-E10	187, 188	6,226	2 - 3	1.58	230.59	1.58	364.33
RAA5-E12	109	11,788	2 - 3	45	436.59	45	19,646.42
RAA5-E29	115	5,727	2 - 3	1.3	212.11	1.3	275.75
RAA5-F9	193	1,663	2 - 3	0.0185	61.60	0.0185	1.14
RAA5-F16	191, 192	17,540	2 - 3	0.0185	649.62	0.0185	12.02
RAA5-F30	123	4,396	2 - 3	1.065	162.82	1.065	173.40
RAA5-G12	128	9,961	2 - 3	0.25	368.94	0.25	92.23
RAA5-G18	129	17,629	2 - 3	0.031	652.92	0.031	20.24
RAA5-H20	138	12,679	2 - 3	0.87	469.59	0.87	408.54
RAA5-H22	139	8,469	2 - 3	11.6	313.68	11.6	3,638.68
RAA5-H25	140	5,342	2 - 3	0.014	197.86	0.014	2.77
RAA5-H26	141	8,224	2 - 3	0.086	304.59	0.086	26.20
RAA5-H28	142	6,124	2 - 3	0.4	226.83	0.4	90.73
RAA5-H29	143	5,102	2 - 3	0.03	188.96	0.03	5.67
RAA5-HI23	152	7,151	2 - 3	0.019	264.83	0.019	5.03
RAA5-I17	154	12,921	2 - 3	6	478.56	6	2,871.37
RAA5-I23	155	11,373	2 - 3	180	421.22	180	75,820.13
RAA5-I25	156	263	2 - 3	0.163	9.73	0.163	1.59
RAA5-J16	196	827	2 - 3	0.0585	30.64	0.0585	1.79
RAA5-J18	162	4,727	2 - 3	0.095	175.09	0.095	16.63
RAA5-J19	163	7,182	2 - 3	11.6	266.00	11.6	3,085.55
RAA5-J21	164	5,982	2 - 3	1.2	221.57	1.2	265.89
RAA5-J22	165	2,026	2 - 3	0.135	75.04	0.135	10.13
RAA5-JK20	169	2,918	2 - 3	10.7	108.09	10.7	1,156.54
Totals:	--	246,709	--	--	9,137.36	--	149,447.90
Volume Weighted Average:							16.36

**TABLE 3
EXISTING CONDITIONS: 1- TO 6-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

3- TO 4-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
95-20	16	5,911	3 - 4	4.1	218.94	4.1	897.66
100-1	1	2,061	3 - 4	1.3	76.32	1.3	99.21
100-2	5	1,352	3 - 4	0.47	50.08	0.47	23.54
100-3	6	915	3 - 4	3.5	33.88	3.5	118.57
100-4	7	3,230	3 - 4	0.025	119.61	0.025	2.99
100-5	8	2,428	3 - 4	3.8	89.94	3.8	341.79
100-6	9	1,466	3 - 4	0.025	54.31	0.025	1.36
100-7	10	1,282	3 - 4	12	47.48	12	569.70
100-8	11	3,892	3 - 4	120	144.14	120	17,296.44
100-9	12	2,130	3 - 4	0.18	78.89	0.18	14.20
100-10	2	892	3 - 4	19	33.02	19	627.46
100-11	3	2,458	3 - 4	1.3	91.03	1.3	118.34
100-12	4	2,044	3 - 4	3.5	75.70	3.5	264.97
ES1-3	28	730	3 - 4	3.37	27.05	3.37	91.15
ES1-10	17	162	3 - 4	0.46	5.98	0.46	2.75
ES1-11	18	3,787	3 - 4	2.3	140.26	2.3	322.61
ES1-28	26	9,685	3 - 4	3.2	358.69	3.2	1,147.80
PS-W-82	57	137	3 - 4	1.7	5.07	1.7	8.62
PS-W-83	58	719	3 - 4	0.6	26.62	0.6	15.97
PS-W-84	59	297	3 - 4	0.18	11.00	0.18	1.98
PS-W-85	60	24	3 - 4	0.78	0.87	0.78	0.68
PS-W-92	67	1	3 - 4	0.58	0.04	0.58	0.02
PS-W-93	68	3,776	3 - 4	1.4	139.86	1.4	195.81
PS-W-94	69	1,248	3 - 4	1.7	46.24	1.7	78.60
PS-W-95	70	2,209	3 - 4	200	81.81	200	16,362.15
PS-W-96	71	1,845	3 - 4	36	68.34	36	2,460.28
PS-W-97	72, 72a	1,696	3 - 4	0.54	62.82	0.54	33.92
PS-W-98	73	2,133	3 - 4	0.11	78.98	0.11	8.69
PS-W-100	32	4,000	3 - 4	2.2	148.15	2.2	325.94
RAA5-C14B	183	2,579	3 - 4	0.019	95.51	0.019	1.81
RAA5-C28	86	2,508	3 - 4	0.081	92.88	0.081	7.52
RAA5-C29	87	471	3 - 4	0.019	17.43	0.019	0.33
RAA5-D15B	185	491	3 - 4	0.4	18.19	0.4	7.28
RAA5-D28	102	1,910	3 - 4	0.315	70.74	0.315	22.28
RAA5-E10	187, 188	6,226	3 - 4	1.58	230.59	1.58	364.33
RAA5-E12	109	11,788	3 - 4	45	436.59	45	19,646.42
RAA5-E29	115	5,727	3 - 4	1.3	212.11	1.3	275.75
RAA5-F9	193	1,663	3 - 4	0.0185	61.60	0.0185	1.14
RAA5-F16	191, 192	17,540	3 - 4	0.0185	649.62	0.0185	12.02
RAA5-F30	123	4,396	3 - 4	1.065	162.82	1.065	173.40
RAA5-G12	128	9,961	3 - 4	0.25	368.94	0.25	92.23
RAA5-G18	129	17,629	3 - 4	0.031	652.92	0.031	20.24
RAA5-H20	138	12,679	3 - 4	0.87	469.59	0.87	408.54
RAA5-H22	139	8,469	3 - 4	11.6	313.68	11.6	3,638.68
RAA5-H25	140	5,342	3 - 4	0.014	197.86	0.014	2.77
RAA5-H26	141	8,224	3 - 4	0.086	304.59	0.086	26.20
RAA5-H28	142	6,124	3 - 4	0.4	226.83	0.4	90.73
RAA5-H29	143	5,102	3 - 4	0.03	188.96	0.03	5.67
RAA5-HI23	152	7,151	3 - 4	0.019	264.83	0.019	5.03
RAA5-I17	154	12,921	3 - 4	6	478.56	6	2,871.37
RAA5-I23	155	11,373	3 - 4	180	421.22	180	75,820.13
RAA5-I25	156	263	3 - 4	0.163	9.73	0.163	1.59
RAA5-J16	196	827	3 - 4	0.0585	30.64	0.0585	1.79
RAA5-J18	162	4,727	3 - 4	0.095	175.09	0.095	16.63
RAA5-J19	163	7,182	3 - 4	11.6	266.00	11.6	3,085.55
RAA5-J21	164	5,982	3 - 4	1.2	221.57	1.2	265.89
RAA5-J22	165	2,026	3 - 4	0.135	75.04	0.135	10.13
RAA5-JK20	169	2,918	3 - 4	10.7	108.09	10.7	1,156.54
Totals:	--	246,709	--	--	9,137.36	--	149,465.20
						Volume Weighted Average:	16.36

**TABLE 3
EXISTING CONDITIONS: 1- TO 6-FOOT DEPTH INCREMENT
BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

4- TO 5-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
95-20	16	5,911	4 - 5	8.4	218.94	8.4	1,839.11
100-1	1	2,061	4 - 5	0.025	76.32	0.025	1.91
100-2	5	1,352	4 - 5	1.6	50.08	1.6	80.13
100-3	6	915	4 - 4.5	3.5	33.88	2.035	68.94
			4.5 - 5	0.57			
100-4	7	3,230	4 - 5	0.025	119.61	0.025	2.99
100-5	8	2,428	4 - 5	0.025	89.94	0.025	2.25
100-6	9	1,466	4 - 5	0.025	54.31	0.025	1.36
100-7	10	1,282	4 - 5	12	47.48	12	569.70
100-8	11	3,892	4 - 5	0.22	144.14	0.22	31.71
100-9	12	2,130	4 - 4.5	0.18	78.89	0.1025	8.09
			4.5 - 5	0.025			
100-10	2	892	4 - 5	16	33.02	16	528.39
100-11	3	2,458	4 - 4.5	1.3	91.03	1.4	127.45
			4.5 - 5	1.5			
100-12	4	2,044	4 - 5	0.57	75.70	0.57	43.15
ES1-3	28	730	4 - 5	5.03	27.05	5.03	136.04
ES1-10	17	162	4 - 5	0.0405	5.98	0.0405	0.24
ES1-11	18	3,787	4 - 5	0.015	140.26	0.015	2.10
ES1-28	26	9,685	4 - 5	0.02	358.69	0.02	7.17
PS-W-82	57	137	4 - 5	0.68	5.07	0.68	3.45
PS-W-83	58	719	4 - 5	0.6	26.62	0.6	15.97
PS-W-84	59	297	4 - 5	0.18	11.00	0.18	1.98
PS-W-85	60	24	4 - 5	0.78	0.87	0.78	0.68
PS-W-92	67	1	4 - 5	0.58	0.04	0.58	0.02
PS-W-93	68	3,776	4 - 5	1.4	139.86	1.4	195.81
PS-W-94	69	1,248	4 - 5	1.7	46.24	1.7	78.60
PS-W-95	70	2,209	4 - 5	200	81.81	200	16,362.15
PS-W-96	71	1,845	4 - 5	36	68.34	36	2,460.28
PS-W-97	72, 72a	1,696	4 - 5	0.54	62.82	0.54	33.92
PS-W-98	73	2,133	4 - 5	0.11	78.98	0.11	8.69
PS-W-100	32	4,000	4 - 5	2.2	148.15	2.2	325.94
RAA5-C14B	183	2,579	4 - 5	0.019	95.51	0.019	1.81
RAA5-C28	86	2,508	4 - 5	0.081	92.88	0.081	7.52
RAA5-C29	87	471	4 - 5	0.019	17.43	0.019	0.33
RAA5-D15B	185	491	4 - 5	0.4	18.19	0.4	7.28
RAA5-D28	102	1,910	4 - 5	0.315	70.74	0.315	22.28
RAA5-E10	187, 188	6,226	4 - 5	1.58	230.59	1.58	364.33
RAA5-E12	109	11,788	4 - 5	45	436.59	45	19,646.42
RAA5-E29	115	5,727	4 - 5	1.3	212.11	1.3	275.75
RAA5-F9	193	1,663	4 - 5	0.0185	61.60	0.0185	1.14
RAA5-F16	191, 192	17,540	4 - 5	0.0185	649.62	0.0185	12.02
RAA5-F30	123	4,396	4 - 5	1.065	162.82	1.065	173.40
RAA5-G12	128	9,961	4 - 5	0.25	368.94	0.25	92.23
RAA5-G18	129	17,629	4 - 5	0.031	652.92	0.031	20.24
RAA5-H20	138	12,679	4 - 5	0.87	469.59	0.87	408.54
RAA5-H22	139	8,469	4 - 5	11.6	313.68	11.6	3,638.68
RAA5-H25	140	5,342	4 - 5	0.014	197.86	0.014	2.77
RAA5-H26	141	8,224	4 - 5	0.086	304.59	0.086	26.20
RAA5-H28	142	6,124	4 - 5	0.4	226.83	0.4	90.73
RAA5-H29	143	5,102	4 - 5	0.03	188.96	0.03	5.67
RAA5-HI23	152	7,151	4 - 5	0.019	264.83	0.019	5.03
RAA5-I17	154	12,921	4 - 5	6	478.56	6	2,871.37
RAA5-I23	155	11,373	4 - 5	180	421.22	180	75,820.13
RAA5-I25	156	263	4 - 5	0.163	9.73	0.163	1.59
RAA5-J16	196	827	4 - 5	0.0585	30.64	0.0585	1.79
RAA5-J18	162	4,727	4 - 5	0.095	175.09	0.095	16.63
RAA5-J19	163	7,182	4 - 5	11.6	266.00	11.6	3,085.55
RAA5-J21	164	5,982	4 - 5	1.2	221.57	1.2	265.89
RAA5-J22	165	2,026	4 - 5	0.135	75.04	0.135	10.13
RAA5-JK20	169	2,918	4 - 5	10.7	108.09	10.7	1,156.54
Totals:	--	246,709	--	--	9,137.36	--	130,970.23
						Volume Weighted Average:	14.33

**TABLE 3
EXISTING CONDITIONS: 1- TO 6-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

5- TO 6-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
95-20	16	5,911	5 - 6	8.4	218.94	8.4	1,839.11
100-1	1	2,735	5 - 6	0.025	101.30	0.025	2.53
100-2	5	1,352	5 - 6	1.6	50.08	1.6	80.13
100-3	6	1,074	5 - 6	0.57	39.79	0.57	22.68
100-4	7	3,685	5 - 6	0.025	136.49	0.025	3.41
100-5	8	2,436	5 - 6	0.025	90.24	0.025	2.26
100-7	9	1,282	5 - 6	12	47.48	12	569.70
100-8	10	3,892	5 - 6	0.22	144.14	0.22	31.71
100-9	11	2,130	5 - 6	0.025	78.89	0.025	1.97
100-10	2	892	5 - 6	16	33.02	16	528.39
100-11	3	2,458	5 - 6	1.5	91.03	1.5	136.55
100-12	4	2,044	5 - 6	0.57	75.70	0.57	43.15
ES1-3	25	730	5 - 6	5.03	27.05	5.03	136.04
ES1-10	17	162	5 - 6	0.0405	5.98	0.0405	0.24
ES1-11	18	3,787	5 - 6	0.015	140.26	0.015	2.10
ES1-28	23	9,685	5 - 6	0.02	358.69	0.02	7.17
PS-W-82	57	137	5 - 6	0.68	5.07	0.68	3.45
PS-W-83	58	719	5 - 6	0.6	26.62	0.6	15.97
PS-W-84	59	297	5 - 6	0.18	11.00	0.18	1.98
PS-W-85	60	24	5 - 6	0.78	0.87	0.78	0.68
PS-W-92	67	1	5 - 6	0.58	0.04	0.58	0.02
PS-W-93	68	3,776	5 - 6	1.4	139.86	1.4	195.81
PS-W-94	69	1,248	5 - 6	1.7	46.24	1.7	78.60
PS-W-95	70	2,209	5 - 6	200	81.81	200	16,362.15
PS-W-96	71	1,845	5 - 6	36	68.34	36	2,460.28
PS-W-97	72, 72a	1,696	5 - 6	0.54	62.82	0.54	33.92
PS-W-98	73	2,133	5 - 6	0.11	78.98	0.11	8.69
PS-W-100	28	4,000	5 - 6	2.2	148.15	2.2	325.94
RAA5-C14B	179	2,579	5 - 6	0.019	95.51	0.019	1.81
RAA5-C28	86	2,508	5 - 6	0.081	92.88	0.081	7.52
RAA5-C29	87	471	5 - 6	0.019	17.43	0.019	0.33
RAA5-D15B	181	491	5 - 6	0.4	18.19	0.4	7.28
RAA5-D28	101	1,910	5 - 6	0.315	70.74	0.315	22.28
RAA5-E10	183, 184	6,226	5 - 6	1.58	230.59	1.58	364.33
RAA5-E12	108	11,788	5 - 6	45	436.59	45	19,646.42
RAA5-E29	114	5,727	5 - 6	1.3	212.11	1.3	275.75
RAA5-F9	189	1,663	5 - 6	0.0185	61.60	0.0185	1.14
RAA5-F16	187, 188	17,540	5 - 6	0.0185	649.62	0.0185	12.02
RAA5-F30	122	4,396	5 - 6	1.065	162.82	1.065	173.40
RAA5-G12	127	9,961	5 - 6	0.25	368.94	0.25	92.23
RAA5-G18	128	17,629	5 - 6	0.031	652.92	0.031	20.24
RAA5-H20	137	12,679	5 - 6	0.87	469.59	0.87	408.54
RAA5-H22	138	8,638	5 - 6	11.6	319.93	11.6	3,711.20
RAA5-H25	139	5,342	5 - 6	0.014	197.86	0.014	2.77
RAA5-H26	140	8,224	5 - 6	0.086	304.59	0.086	26.20
RAA5-H28	141	6,124	5 - 6	0.4	226.83	0.4	90.73
RAA5-H29	142	5,102	5 - 6	0.03	188.96	0.03	5.67
RAA5-HI23	150	7,151	5 - 6	0.019	264.83	0.019	5.03
RAA5-I17	152	12,921	5 - 6	6	478.56	6	2,871.37
RAA5-I23	153	11,373	5 - 6	180	421.22	180	75,820.13
RAA5-I25	154	263	5 - 6	0.163	9.73	0.163	1.59
RAA5-J16	194	827	5 - 6	0.0585	30.64	0.0585	1.79
RAA5-J18	158	4,727	5 - 6	0.095	175.09	0.095	16.63
RAA5-J19	159	7,182	5 - 6	11.6	266.00	11.6	3,085.55
RAA5-J21	160	5,982	5 - 6	1.2	221.57	1.2	265.89
RAA5-J22	161	2,026	5 - 6	0.135	75.04	0.135	10.13
RAA5-JK20	165	2,918	5 - 6	10.7	108.09	10.7	1,156.54
Totals:	--	246,709	--	--	9,137.36	--	130,999.17
Volume Weighted Average:							14.34

TABLE 3
EXISTING CONDITIONS: 1- TO 6-FOOT DEPTH INCREMENT
BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

SUMMARY - 1- TO 6-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	246,709	--	--	45,686.81	--	860,099.54
Volume Weighted Average:							18.83

Notes:

1. Polygon ID and area based on information shown on Figures 3 through 6.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.

**TABLE 4
POST REMEDIATION CONDITIONS: 0- TO 15-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

SUMMARY - 0- TO 1-FOOT DEPTH INCREMENT (TABLE 2)

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	246,711	--	--	9,137.45	--	186,245.90
						Volume Weighted Average:	20.38

SUMMARY - 1- TO 6-FOOT DEPTH INCREMENT (TABLE 3)

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	246,709	--	--	45,686.81	--	860,099.54
						Volume Weighted Average:	18.83

6- TO 7-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
95-20	8	5,911	6 - 7	6.5	218.94	6.5	1,423.12
100-3	2	8,140	6 - 6.5	0.57	301.48	0.57	171.84
100-9	3	5,238	6 - 6.5	0.025	194.01	0.025	4.85
100-11	1	3,201	6 - 6.5	1.5	118.54	1.5	177.81
ES1-3	17	4,139	6 - 7	80	153.28	80	12,262.40
ES1-28	15	10,699	6 - 7	0.017	396.24	0.017	6.74
PS-W-82	50	137	6 - 7	0.68	5.07	0.68	3.45
PS-W-83	51	719	6 - 7	0.025	26.62	0.025	0.67
PS-W-84	52	297	6 - 7	0.025	11.00	0.025	0.27
PS-W-85	53	24	6 - 7	0.14	0.87	0.14	0.12
PS-W-89	57	6	6 - 7	1	0.22	1	0.22
PS-W-90	58	27	6 - 7	68	0.99	68	67.47
PS-W-91	59	885	6 - 7	1.2	32.77	1.2	39.33
PS-W-92	60	1	6 - 7	0.24	0.04	0.24	0.01
PS-W-93	61	3,776	6 - 7	4.3	139.86	4.3	601.41
PS-W-94	62, 62a	1,859	6 - 7	1.8	68.84	1.8	123.91
PS-W-95	63, 63a	2,385	6 - 7	32	88.34	32	2,826.83
PS-W-96	64, 64a	1,889	6 - 7	110	69.97	110	7,696.25
PS-W-97	65	1,629	6 - 7	1.5	60.32	1.5	90.49
PS-W-98	66	4,449	6 - 7	0.21	164.76	0.21	34.60
PS-W-100	20	3,633	6 - 7	3.3	134.56	3.3	444.05
RAA5-C14B	162	2,579	6 - 7	0.0185	95.51	0.0185	1.77
RAA5-C28	79	2,508	6 - 7	0.019	92.88	0.019	1.76
RAA5-C29	80	471	6 - 7	0.01975	17.43	0.01975	0.34
RAA5-D15B	164	491	6 - 7	0.0185	18.19	0.0185	0.34
RAA5-D28	94	1,910	6 - 7	0.0185	70.74	0.0185	1.31
RAA5-E10	166, 167	6,226	6 - 7	0.32	230.59	0.32	73.79
RAA5-E12	101	11,788	6 - 7	1.97	436.59	1.97	860.08
RAA5-E29	107	5,727	6 - 7	0.0377	212.11	0.0377	8.00
RAA5-F9	172	1,663	6 - 7	0.021	61.60	0.021	1.29
RAA5-F16	170, 171	17,539	6 - 7	0.0185	649.61	0.0185	12.02
RAA5-F30	115	4,480	6 - 7	1.7	165.92	1.7	282.06
RAA5-G12	119	9,961	6 - 7	39	368.94	39	14,388.47
RAA5-G18	120	17,629	6 - 7	0.0185	652.92	0.0185	12.08
RAA5-G28	122	12	6 - 7	0.019	0.45	0.019	0.01
RAA5-H20	129	12,679	6 - 7	0.039	469.59	0.039	18.31
RAA5-H22	130	12,723	6 - 7	0.022	471.24	0.022	10.37
RAA5-H24	131	5,599	6 - 7	0.019	207.38	0.019	3.94
RAA5-H26	132	10,768	6 - 7	0.019	398.82	0.019	7.58
RAA5-H28	133	6,117	6 - 7	0.172	226.56	0.172	38.97
RAA5-H29	134	5,175	6 - 7	0.122	191.66	0.122	23.38
RAA5-I17	142	12,921	6 - 7	8.1	478.56	8.1	3,876.35
RAA5-I23	143	16,800	6 - 7	0.12	622.21	0.12	74.67
RAA5-I25	144	263	6 - 7	0.0185	9.73	0.0185	0.18
RAA5-J16	177	827	6 - 7	0.0185	30.64	0.0185	0.57
RAA5-J18	148	8,477	6 - 7	0.019	313.94	0.019	5.96
RAA5-J21	149	9,067	6 - 7	0.018	335.82	0.018	6.04
RAA5-K19	154	3,267	6 - 7	0.68	120.98	0.68	82.27
Totals:	--	246,709	--	--	9,137.35	--	45,767.76
						Volume Weighted Average:	5.01

**TABLE 4
POST REMEDIATION CONDITIONS: 0- TO 15-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

7- TO 8-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
95-20	5	5,911	7 - 8	6.5	218.94	6.5	1,423.12
ES1-3	14	7,301	7 - 8	80	270.41	80	21,632.86
ES1-28	12	13,904	7 - 8	0.017	514.95	0.017	8.75
PS-W-82	47	137	7 - 8	0.68	5.07	0.68	3.45
PS-W-83	48	719	7 - 8	0.025	26.62	0.025	0.67
PS-W-84	49	297	7 - 8	0.025	11.00	0.025	0.27
PS-W-85	50	24	7 - 8	0.14	0.87	0.14	0.12
PS-W-89	54	6	7 - 8	1	0.22	1	0.22
PS-W-90	55	27	7 - 8	68	0.99	68	67.47
PS-W-91	56	885	7 - 8	1.2	32.77	1.2	39.33
PS-W-92	57	1	7 - 8	0.24	0.04	0.24	0.01
PS-W-93	58	3,776	7 - 8	4.3	139.86	4.3	601.41
PS-W-94	59, 59a	1,859	7 - 8	1.8	68.84	1.8	123.91
PS-W-95	60, 60a	2,385	7 - 8	32	88.34	32	2,826.83
PS-W-96	61, 61a	1,889	7 - 8	110	69.97	110	7,696.25
PS-W-97	62	1,629	7 - 8	1.5	60.32	1.5	90.49
PS-W-98	63	4,449	7 - 8	0.21	164.76	0.21	34.60
PS-W-100	17	3,633	7 - 8	3.3	134.56	3.3	444.05
RAA5-C14B	159	2,579	7 - 8	0.0185	95.51	0.0185	1.77
RAA5-C28	76	2,508	7 - 8	0.019	92.88	0.019	1.76
RAA5-C29	77	471	7 - 8	0.01975	17.43	0.01975	0.34
RAA5-D15B	161	491	7 - 8	0.0185	18.19	0.0185	0.34
RAA5-D28	91	1,910	7 - 8	0.0185	70.74	0.0185	1.31
RAA5-E10	163, 164	6,226	7 - 8	0.32	230.59	0.32	73.79
RAA5-E12	98	11,788	7 - 8	1.97	436.59	1.97	860.08
RAA5-E29	104	5,727	7 - 8	0.0377	212.11	0.0377	8.00
RAA5-F9	169	1,663	7 - 8	0.021	61.60	0.021	1.29
RAA5-F16	167, 168	17,540	7 - 8	0.0185	649.62	0.0185	12.02
RAA5-F30	112	4,480	7 - 8	1.7	165.92	1.7	282.06
RAA5-G12	116	9,961	7 - 8	39	368.94	39	14,388.50
RAA5-G18	117	17,629	7 - 8	0.0185	652.92	0.0185	12.08
RAA5-G28	119	12	7 - 8	0.019	0.45	0.019	0.01
RAA5-H20	126	12,679	7 - 8	0.039	469.59	0.039	18.31
RAA5-H22	127	16,549	7 - 8	0.022	612.94	0.022	13.48
RAA5-H24	128	5,599	7 - 8	0.019	207.38	0.019	3.94
RAA5-H26	129	10,768	7 - 8	0.019	398.82	0.019	7.58
RAA5-H28	130	6,117	7 - 8	0.172	226.56	0.172	38.97
RAA5-H29	131	5,175	7 - 8	0.122	191.66	0.122	23.38
RAA5-I17	139	12,921	7 - 8	8.1	478.56	8.1	3,876.35
RAA5-I23	140	17,667	7 - 8	0.12	654.34	0.12	78.52
RAA5-I25	141	263	7 - 8	0.0185	9.73	0.0185	0.18
RAA5-J16	174	827	7 - 8	0.0185	30.64	0.0185	0.57
RAA5-J18	145	8,477	7 - 8	0.019	313.94	0.019	5.96
RAA5-J21	146	14,585	7 - 8	0.018	540.18	0.018	9.72
RAA5-K19	151	3,267	7 - 8	0.68	120.98	0.68	82.27
Totals:	--	246,709	--	--	9,137.36	--	54,796.42
Volume Weighted Average:							6.00

**TABLE 4
POST REMEDIATION CONDITIONS: 0- TO 15-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

8- TO 9-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
95-20	5	5,911	8 - 9	0.0365	218.94	0.0365	7.99
ES1-3	13	7,301	8 - 9	2.24	270.41	2.24	605.72
ES1-11	6	5,932	8 - 9	0.12	219.70	0.12	26.36
PS-W-82	46	137	8 - 9	0.025	5.07	0.025	0.13
PS-W-83	47	719	8 - 9	0.025	26.62	0.025	0.67
PS-W-84	48	297	8 - 9	0.025	11.00	0.025	0.27
PS-W-85	49	24	8 - 9	0.14	0.87	0.14	0.12
PS-W-89	53	6	8 - 9	1	0.22	1	0.22
PS-W-90	54	27	8 - 9	68	0.99	68	67.47
PS-W-91	55	494	8 - 9	1.2	18.29	1.2	21.95
PS-W-92	56	1	8 - 9	0.24	0.04	0.24	0.01
PS-W-93	57	3,776	8 - 9	4.3	139.86	4.3	601.41
PS-W-94	58	1,248	8 - 9	1.8	46.24	1.8	83.23
PS-W-95	59	2,209	8 - 9	32	81.81	32	2,617.94
PS-W-96	60	1,845	8 - 9	110	68.34	110	7,517.52
PS-W-97	61	1,629	8 - 9	1.5	60.32	1.5	90.49
PS-W-98	62	4,449	8 - 9	0.21	164.76	0.21	34.60
PS-W-100	16	3,633	8 - 9	3.3	134.56	3.3	444.05
RAA5-C14B	158	2,579	8 - 9	0.0185	95.51	0.0185	1.77
RAA5-C28	75	2,508	8 - 9	0.019	92.88	0.019	1.76
RAA5-C29	76	471	8 - 9	0.01975	17.43	0.01975	0.34
RAA5-D15B	160	491	8 - 9	0.0185	18.19	0.0185	0.34
RAA5-D28	90	1,910	8 - 9	0.0185	70.74	0.0185	1.31
RAA5-E10	162, 163	6,226	8 - 9	0.32	230.59	0.32	73.79
RAA5-E12	97	11,788	8 - 9	1.97	436.59	1.97	860.08
RAA5-E29	103	5,727	8 - 9	0.0377	212.11	0.0377	8.00
RAA5-F9	168	1,663	8 - 9	0.021	61.60	0.021	1.29
RAA5-F16	166, 167	17,540	8 - 9	0.0185	649.62	0.0185	12.02
RAA5-F30	111	4,480	8 - 9	1.7	165.92	1.7	282.06
RAA5-G12	115	9,961	8 - 9	39	368.94	39	14,388.50
RAA5-G18	116	17,629	8 - 9	0.0185	652.92	0.0185	12.08
RAA5-G28	118	12	8 - 9	0.019	0.45	0.019	0.01
RAA5-H20	125	16,868	8 - 9	0.039	624.74	0.039	24.37
RAA5-H22	126	25,605	8 - 9	0.022	948.32	0.022	20.86
RAA5-H24	127	1,542	8 - 9	0.019	57.11	0.019	1.09
RAA5-H26	128	10,115	8 - 9	0.019	374.63	0.019	7.12
RAA5-H28	129	6,117	8 - 9	0.172	226.56	0.172	38.97
RAA5-H29	130	5,175	8 - 9	0.122	191.66	0.122	23.38
RAA5-I17	138	12,921	8 - 9	8.1	478.56	8.1	3,876.35
RAA5-I23	139	17,667	8 - 9	0.12	654.34	0.12	78.52
RAA5-I25	140	263	8 - 9	0.0185	9.73	0.0185	0.18
RAA5-J16	173	827	8 - 9	0.0185	30.64	0.0185	0.57
RAA5-J18	144	8,477	8 - 9	0.019	313.94	0.019	5.96
RAA5-J21	145	15,244	8 - 9	0.018	564.60	0.018	10.16
RAA5-K19	150	3,267	8 - 9	0.68	120.98	0.68	82.27
Totals:	--	246,709	--	--	9,137.36	--	31,933.30
Volume Weighted Average:							3.49

**TABLE 4
POST REMEDIATION CONDITIONS: 0- TO 15-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

9- TO 10-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
95-20	5	5,911	9 - 10	0.0365	218.94	0.0365	7.99
ES1-3	13	7,301	9 - 10	2.24	270.41	2.24	605.72
ES1-11	6	5,932	9 - 10	0.12	219.70	0.12	26.36
PS-W-82	46	137	9 - 10	0.025	5.07	0.025	0.13
PS-W-83	47	719	9 - 10	0.025	26.62	0.025	0.67
PS-W-84	48	297	9 - 10	0.025	11.00	0.025	0.27
PS-W-85	49	24	9 - 10	0.14	0.87	0.14	0.12
PS-W-89	53	6	9 - 10	1	0.22	1	0.22
PS-W-90	54	27	9 - 10	68	0.99	68	67.47
PS-W-91	55	494	9 - 10	1.2	18.29	1.2	21.95
PS-W-92	56	1	9 - 10	0.24	0.04	0.24	0.01
PS-W-93	57	3,776	9 - 10	4.3	139.86	4.3	601.41
PS-W-94	58	1,248	9 - 10	1.8	46.24	1.8	83.23
PS-W-95	59	2,209	9 - 10	32	81.81	32	2,617.94
PS-W-96	60	1,845	9 - 10	110	68.34	110	7,517.52
PS-W-97	61	1,629	9 - 10	1.5	60.32	1.5	90.49
PS-W-98	62	4,449	9 - 10	0.21	164.76	0.21	34.60
PS-W-100	16	3,633	9 - 10	3.3	134.56	3.3	444.05
RAA5-C14B	158	2,579	9 - 10	0.0185	95.51	0.0185	1.77
RAA5-C28	75	2,508	9 - 10	0.019	92.88	0.019	1.76
RAA5-C29	76	471	9 - 10	0.01975	17.43	0.01975	0.34
RAA5-D15B	160	491	9 - 10	0.0185	18.19	0.0185	0.34
RAA5-D28	90	1,910	9 - 10	0.0185	70.74	0.0185	1.31
RAA5-E10	162, 163	6,226	9 - 10	0.32	230.59	0.32	73.79
RAA5-E12	97	11,788	9 - 10	1.97	436.59	1.97	860.08
RAA5-E29	103	5,727	9 - 10	0.0377	212.11	0.0377	8.00
RAA5-F9	168	1,663	9 - 10	0.021	61.60	0.021	1.29
RAA5-F16	166, 167	17,540	9 - 10	0.0185	649.62	0.0185	12.02
RAA5-F30	111	4,480	9 - 10	1.7	165.92	1.7	282.06
RAA5-G12	115	9,961	9 - 10	39	368.94	39	14,388.50
RAA5-G18	116	17,629	9 - 10	0.0185	652.92	0.0185	12.08
RAA5-G28	118	12	9 - 10	0.019	0.45	0.019	0.01
RAA5-H20	125	16,868	9 - 10	0.039	624.74	0.039	24.37
RAA5-H22	126	25,605	9 - 10	0.022	948.32	0.022	20.86
RAA5-H24	127	1,542	9 - 10	0.019	57.11	0.019	1.09
RAA5-H26	128	10,115	9 - 10	0.019	374.63	0.019	7.12
RAA5-H28	129	6,117	9 - 10	0.172	226.56	0.172	38.97
RAA5-H29	130	5,175	9 - 10	0.122	191.66	0.122	23.38
RAA5-I17	138	12,921	9 - 10	8.1	478.56	8.1	3,876.35
RAA5-I23	139	17,667	9 - 10	0.12	654.34	0.12	78.52
RAA5-I25	140	263	9 - 10	0.0185	9.73	0.0185	0.18
RAA5-J16	173	827	9 - 10	0.0185	30.64	0.0185	0.57
RAA5-J18	144	8,477	9 - 10	0.019	313.94	0.019	5.96
RAA5-J21	145	15,244	9 - 10	0.018	564.60	0.018	10.16
RAA5-K19	150	3,267	9 - 10	0.68	120.98	0.68	82.27
Totals:	--	246,709	--	--	9,137.36	--	31,933.30
Volume Weighted Average:							3.49

**TABLE 4
POST REMEDIATION CONDITIONS: 0- TO 15-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

10- TO 11-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
95-20	5	5,911	10 - 11	0.42	218.94	0.42	91.96
ES1-3	10	7,301	10 - 11	0.025	270.41	0.025	6.76
PS-W-90	16	658	10 - 11	68	24.35	68	1,656.05
PS-W-98	17	10,622	10 - 11	0.06	393.39	0.06	23.60
RAA5-C10	156	64	10 - 11	0.0185	2.37	0.0185	0.04
RAA5-C14B	108	2,579	10 - 11	0.0185	95.51	0.0185	1.77
RAA5-C28	30	2,508	10 - 11	0.019	92.88	0.019	1.76
RAA5-C29	31	471	10 - 11	0.01975	17.43	0.01975	0.34
RAA5-D9	51a	1,193	10 - 11	0.0185	44.17	0.0185	0.82
RAA5-D15B	110	491	10 - 11	0.0185	18.19	0.0185	0.34
RAA5-D28	45	1,910	10 - 11	0.0185	70.74	0.0185	1.31
RAA5-E12	52	13,744	10 - 11	1.97	509.02	1.97	1,002.77
RAA5-E29	58	5,727	10 - 11	0.0377	212.11	0.0377	8.00
RAA5-F9	167	4,573	10 - 11	0.021	169.38	0.021	3.56
RAA5-F16	114, 115	17,540	10 - 11	0.0185	649.62	0.0185	12.02
RAA5-F30	66	4,480	10 - 11	1.7	165.92	1.7	282.06
RAA5-G12	69	10,065	10 - 11	39	372.76	39	14,537.64
RAA5-G18	70	17,629	10 - 11	0.0185	652.92	0.0185	12.08
RAA5-G28	72	12	10 - 11	0.019	0.45	0.019	0.01
RAA5-H20	79	16,868	10 - 11	0.039	624.74	0.039	24.37
RAA5-H22	80	25,739	10 - 11	0.022	953.31	0.022	20.97
RAA5-H24	81, 81a	7,559	10 - 11	0.019	279.95	0.019	5.32
RAA5-H26	82	11,442	10 - 11	0.019	423.79	0.019	8.05
RAA5-H28	83	6,669	10 - 11	0.172	247.02	0.172	42.49
RAA5-H29	84	5,175	10 - 11	0.122	191.66	0.122	23.38
RAA5-I17	92	12,921	10 - 11	8.1	478.56	8.1	3,876.35
RAA5-I23	93	19,006	10 - 11	0.12	703.91	0.12	84.47
RAA5-I25	94, 94a	5,917	10 - 11	0.0185	219.16	0.0185	4.05
RAA5-I27	96	122	10 - 11	0.019	4.50	0.019	0.09
RAA5-J16	122	827	10 - 11	0.0185	30.64	0.0185	0.57
RAA5-J18	98	8,477	10 - 11	0.019	313.94	0.019	5.96
RAA5-J21	99	15,244	10 - 11	0.018	564.60	0.018	10.16
RAA5-K19	104	3,267	10 - 11	0.68	120.98	0.68	82.27
Totals:	--	246,709	--	--	9,137.36	--	21,831.39
Volume Weighted Average:							2.39

**TABLE 4
POST REMEDIATION CONDITIONS: 0- TO 15-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

11- TO 12-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
95-20	5	5,911	11 - 12	0.42	218.94	0.42	91.96
ES1-3	10	7,301	11 - 12	0.025	270.41	0.025	6.76
PS-W-90	16	658	11 - 12	68	24.35	68	1,656.05
PS-W-98	17	10,622	11 - 12	0.06	393.39	0.06	23.60
RAA5-C14B	107	2,579	11 - 12	0.0185	95.51	0.0185	1.77
RAA5-C28	30	2,508	11 - 12	0.019	92.88	0.019	1.76
RAA5-C29	31	471	11 - 12	0.01975	17.43	0.01975	0.34
RAA5-D9	51	1,241	11 - 12	0.0185	45.97	0.0185	0.85
RAA5-D15B	109	491	11 - 12	0.0185	18.19	0.0185	0.34
RAA5-D28	45	1,910	11 - 12	0.0185	70.74	0.0185	1.31
RAA5-E12	52	13,759	11 - 12	1.97	509.60	1.97	1,003.90
RAA5-E29	58	5,727	11 - 12	0.0377	212.11	0.0377	8.00
RAA5-F9	116	4,573	11 - 12	0.021	169.38	0.021	3.56
RAA5-F16	113, 114	17,540	11 - 12	0.0185	649.62	0.0185	12.02
RAA5-F30	66	4,480	11 - 12	1.7	165.92	1.7	282.06
RAA5-G12	69	10,065	11 - 12	39	372.76	39	14,537.64
RAA5-G18	70	17,629	11 - 12	0.0185	652.92	0.0185	12.08
RAA5-G28	72	12	11 - 12	0.019	0.45	0.019	0.01
RAA5-H20	79	16,868	11 - 12	0.039	624.74	0.039	24.37
RAA5-H22	80	25,739	11 - 12	0.022	953.31	0.022	20.97
RAA5-H24	81, 81a	7,559	11 - 12	0.019	279.95	0.019	5.32
RAA5-H26	82	11,442	11 - 12	0.019	423.79	0.019	8.05
RAA5-H28	83	6,669	11 - 12	0.172	247.02	0.172	42.49
RAA5-H29	84	5,175	11 - 12	0.122	191.66	0.122	23.38
RAA5-I17	92	12,921	11 - 12	8.1	478.56	8.1	3,876.35
RAA5-I23	93	19,006	11 - 12	0.12	703.91	0.12	84.47
RAA5-I25	94, 94a	5,917	11 - 12	0.0185	219.16	0.0185	4.05
RAA5-I27	96	122	11 - 12	0.019	4.50	0.019	0.09
RAA5-J16	121	827	11 - 12	0.0185	30.64	0.0185	0.57
RAA5-J18	98	8,477	11 - 12	0.019	313.94	0.019	5.96
RAA5-J21	99	15,244	11 - 12	0.018	564.60	0.018	10.16
RAA5-K19	104	3,267	11 - 12	0.68	120.98	0.68	82.27
Totals:	--	246,709	--	--	9,137.36	--	21,832.51
Volume Weighted Average:						2.39	

**TABLE 4
POST REMEDIATION CONDITIONS: 0- TO 15-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

12- TO 13-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
BH000783	103	10,819	12 - 13	1200	400.72	1200	480,861.33
ES1-3	10	7,301	12 - 13	0.025	270.41	0.025	6.76
PS-W-90	13	658	12 - 13	68	24.35	68	1,656.05
PS-W-98	14	10,622	12 - 13	0.06	393.39	0.06	23.60
RAA5-C14B	106	2,579	12 - 13	0.0185	95.51	0.0185	1.77
RAA5-C28	27	2,508	12 - 13	0.019	92.88	0.019	1.76
RAA5-C29	28	471	12 - 13	0.01975	17.43	0.01975	0.34
RAA5-D9	48	1,241	12 - 13	0.0185	45.97	0.0185	0.85
RAA5-D15B	108	491	12 - 13	0.0185	18.19	0.0185	0.34
RAA5-D28	42	1,910	12 - 13	0.0185	70.74	0.0185	1.31
RAA5-E12	49	13,759	12 - 13	1.97	509.60	1.97	1,003.90
RAA5-E29	55	5,727	12 - 13	0.0377	212.11	0.0377	8.00
RAA5-F9	115	4,573	12 - 13	0.021	169.38	0.021	3.56
RAA5-F16	112, 113	16,412	12 - 13	0.0185	607.84	0.0185	11.24
RAA5-F30	62	4,480	12 - 13	1.7	165.92	1.7	282.06
RAA5-G12	65	9,086	12 - 13	39	336.50	39	13,123.69
RAA5-G18	66	17,629	12 - 13	0.0185	652.92	0.0185	12.08
RAA5-G28	68	12	12 - 13	0.019	0.45	0.019	0.01
RAA5-H20	75	16,868	12 - 13	0.039	624.74	0.039	24.37
RAA5-H22	76	25,739	12 - 13	0.022	953.31	0.022	20.97
RAA5-H24	77, 77a	7,559	12 - 13	0.019	279.95	0.019	5.32
RAA5-H26	78	11,442	12 - 13	0.019	423.79	0.019	8.05
RAA5-H28	79	6,669	12 - 13	0.172	247.02	0.172	42.49
RAA5-H29	80	5,175	12 - 13	0.122	191.66	0.122	23.38
RAA5-I17	88	10,948	12 - 13	8.1	405.48	8.1	3,284.40
RAA5-I23	89	19,006	12 - 13	0.12	703.91	0.12	84.47
RAA5-I25	90, 90a	5,917	12 - 13	0.0185	219.16	0.0185	4.05
RAA5-I27	92	122	12 - 13	0.019	4.50	0.019	0.09
RAA5-J18	95	8,477	12 - 13	0.019	313.94	0.019	5.96
RAA5-J21	96	15,244	12 - 13	0.018	564.60	0.018	10.16
RAA5-K19	101	3,267	12 - 13	0.68	120.98	0.68	82.27
Totals:	--	246,709	--	--	9,137.38	--	500,594.64
						Volume Weighted Average:	54.79

**TABLE 4
POST REMEDIATION CONDITIONS: 0- TO 15-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

13- TO 14-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
BH000783	103	10,819	13 - 14	1200	400.72	1200	480,861.33
ES1-3	10	7,301	13 - 14	0.025	270.41	0.025	6.76
PS-W-90	13	658	13 - 14	68	24.35	68	1,656.05
PS-W-98	14	10,622	13 - 14	0.06	393.39	0.06	23.60
RAA5-C14B	106	2,579	13 - 14	0.0185	95.51	0.0185	1.77
RAA5-C28	27	2,508	13 - 14	0.019	92.88	0.019	1.76
RAA5-C29	28	471	13 - 14	0.01975	17.43	0.01975	0.34
RAA5-D9	48	1,241	13 - 14	0.0185	45.97	0.0185	0.85
RAA5-D15B	108	491	13 - 14	0.0185	18.19	0.0185	0.34
RAA5-D28	42	1,910	13 - 14	0.0185	70.74	0.0185	1.31
RAA5-E12	49	13,759	13 - 14	1.97	509.60	1.97	1,003.90
RAA5-E29	55	5,727	13 - 14	0.0377	212.11	0.0377	8.00
RAA5-F9	115	4,573	13 - 14	0.021	169.38	0.021	3.56
RAA5-F16	112, 113	16,412	13 - 14	0.0185	607.84	0.0185	11.24
RAA5-F30	62	4,480	13 - 14	1.7	165.92	1.7	282.06
RAA5-G12	65	9,086	13 - 14	39	336.50	39	13,123.69
RAA5-G18	66	17,629	13 - 14	0.0185	652.92	0.0185	12.08
RAA5-G28	68	12	13 - 14	0.019	0.45	0.019	0.01
RAA5-H20	75	16,868	13 - 14	0.039	624.74	0.039	24.37
RAA5-H22	76	25,739	13 - 14	0.022	953.31	0.022	20.97
RAA5-H24	77, 77a	7,559	13 - 14	0.019	279.95	0.019	5.32
RAA5-H26	78	11,442	13 - 14	0.019	423.79	0.019	8.05
RAA5-H28	79	6,669	13 - 14	0.172	247.02	0.172	42.49
RAA5-H29	80	5,175	13 - 14	0.122	191.66	0.122	23.38
RAA5-I17	88	10,948	13 - 14	8.1	405.48	8.1	3,284.40
RAA5-I23	89	19,006	13 - 14	0.12	703.91	0.12	84.47
RAA5-I25	90, 90a	5,917	13 - 14	0.0185	219.16	0.0185	4.05
RAA5-I27	92	122	13 - 14	0.019	4.50	0.019	0.09
RAA5-J18	95	8,477	13 - 14	0.019	313.94	0.019	5.96
RAA5-J21	96	15,244	13 - 14	0.018	564.60	0.018	10.16
RAA5-K19	101	3,267	13 - 14	0.68	120.98	0.68	82.27
Totals:	--	246,709	--	--	9,137.38	--	500,594.64
						Volume Weighted Average:	54.79

**TABLE 4
POST REMEDIATION CONDITIONS: 0- TO 15-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

14- TO 15-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
95-20	4	5,911	14 - 15	0.00805	218.94	0.00805	1.76
ES1-3	9	7,301	14 - 15	0.56	270.41	0.56	151.43
RAA5-C14B	97	2,579	14 - 15	0.0185	95.51	0.0185	1.77
RAA5-C28	24	2,508	14 - 15	0.019	92.88	0.019	1.76
RAA5-C29	25	471	14 - 15	0.01975	17.43	0.01975	0.34
RAA5-D9	45	1,241	14 - 15	0.0185	45.97	0.0185	0.85
RAA5-D15B	99	491	14 - 15	0.0185	18.19	0.0185	0.34
RAA5-D28	39	1,910	14 - 15	0.0185	70.74	0.0185	1.31
RAA5-E12	46	13,759	14 - 15	1.97	509.60	1.97	1,003.90
RAA5-E29	52	5,727	14 - 15	0.0377	212.11	0.0377	8.00
RAA5-F9	106	4,573	14 - 15	0.021	169.38	0.021	3.56
RAA5-F16	103, 104	17,540	14 - 15	0.0185	649.62	0.0185	12.02
RAA5-F30	58	4,480	14 - 15	1.7	165.92	1.7	282.06
RAA5-G12	61	10,065	14 - 15	39	372.76	39	14,537.64
RAA5-G18	62	17,629	14 - 15	0.0185	652.92	0.0185	12.08
RAA5-G28	64	12	14 - 15	0.019	0.45	0.019	0.01
RAA5-H20	71	16,868	14 - 15	0.039	624.74	0.039	24.37
RAA5-H22	72	26,561	14 - 15	0.022	983.73	0.022	21.64
RAA5-H24	73	13,739	14 - 15	0.019	508.84	0.019	9.67
RAA5-H26	74	11,723	14 - 15	0.019	434.19	0.019	8.25
RAA5-H28	75	6,669	14 - 15	0.172	247.02	0.172	42.49
RAA5-H29	76	5,175	14 - 15	0.122	191.66	0.122	23.38
RAA5-I17	84	12,921	14 - 15	8.1	478.56	8.1	3,876.35
RAA5-I23	85	22,282	14 - 15	0.12	825.25	0.12	99.03
RAA5-I25	86, 86a	6,639	14 - 15	0.0185	245.87	0.0185	4.55
RAA5-I27	88	122	14 - 15	0.019	4.50	0.019	0.09
RAA5-J16	111	827	14 - 15	0.0185	30.64	0.0185	0.57
RAA5-J18	90	8,477	14 - 15	0.019	313.94	0.019	5.96
RAA5-J21	91	15,244	14 - 15	0.018	564.60	0.018	10.16
RAA5-K19	96	3,267	14 - 15	0.68	120.98	0.68	82.27
Totals:	--	246,709	--	--	9,137.36	--	20,227.60
Volume Weighted Average:							2.21

SUMMARY - 0- TO 15-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	246,709	--	--	137,060.56	--	2,275,857.01
Volume Weighted Average:							16.60

Notes:

1. Polygon ID and area based on information shown on Figures 7 through 13.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.

**TABLE 5
COMPARISON OF DETECTED APPENDIX IX+3 CONSTITUENTS TO INDUSTRIAL SCREENING PRGs**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY-PITTSFIELD, MASSACHUSETTS
(Results in ppm, dry weight)**

Analytical Parameter	Maximum Detect	USEPA Region 9 Industrial PRGs (See Note 3)	Constituent Retained for Further Evaluation ? (See Note 4)
Volatile Organics			
Acetone	0.012	6,100	No
Chloroform	0.037	0.52	No
Ethylbenzene	34	230	No
Methylene Chloride	340	20	Yes
Toluene	2	520	No
Xylenes (total)	1.3	210*	No
Semivolatile Organics			
Acenaphthene	0.19	28,000	No
Acenaphthylene	0.21	190*	No
Anthracene	0.65	220,000	No
Benzo(a)anthracene	3.2	3.6	No
Benzo(a)pyrene	1.8	0.36	Yes
Benzo(b)fluoranthene	1	3.6	No
Benzo(g,h,i)perylene	0.96	190*	No
Benzo(k)fluoranthene	1.2	36	No
bis(2-Ethylhexyl)phthalate	0.21	210	No
Chrysene	3.7	360	No
Dibenzo(a,h)anthracene	0.35	0.36	No
Fluoranthene	4	37,000	No
Fluorene	0.18	22,000	No
Indeno(1,2,3-cd)pyrene	0.67	3.6	No
Naphthalene	0.23	190	No
Phenanthrene	2.7	190*	No
Pyrene	7.9	26,000	No
Inorganics			
Antimony	4	750	No
Arsenic	15	3	Yes
Barium	57	100,000	No
Beryllium	0.41	3,400	No
Cadmium	1.2	930	No
Chromium	11	450	No
Cobalt	31	29,000	No
Copper	49	70,000	No
Cyanide	0.94	35*	No
Lead	160	1,000	No
Mercury	0.84	560	No
Nickel	23	37,000	No
Selenium	0.94	9,400	No
Silver	0.2	9,400	No
Sulfide	48	1,200*	No
Thallium	0.53	150	No
Tin	3.1	100,000	No
Vanadium	9.2	13,000	No
Zinc	180	100,000	No

Notes:

1. PRG = Preliminary Remediation Goal.
2. Per Attachment F to *Statement of Work for Removal Actions Outside the River (SOW)*, comparison to PRGs is required for all detected Appendix IX+3 constituents except PCBs, dioxins and furans.
3. The PRGs listed in this column consist of EPA Region 9 Industrial soil PRGs for the constituents listed in Exhibit F-1 to Attachment F to the SOW.
4. * = No EPA Region 9 PRG exists for certain noncarcinogenic PAHs (i.e., acenaphthylene, benzo(g,h,i)perylene, and phenanthrene), cyanide, sulfide, and xylenes (total). The PRGs for naphthalene, hydrogen cyanide, carbon disulfide and m-xylene, respectively, were used as surrogates.
5. Constituent is retained for further evaluation if its maximum detected concentration exceeds its corresponding PRG.

**TABLE 6
EXISTING CONDITIONS - COMPARISON TO METHOD 1 SOIL STANDARDS
0- TO 1-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results in ppm, dry weight)**

Sample ID: Sample Depth(Feet): Date Collected:	ES1-11 0-2 05/13/96	PS-W-98A 0-2 08/01/89	RAA5-E12 0-1 03/02/04	RAA5-E29 0-1 01/12/04	RAA5-F16 0-1 03/01/04	RAA5-G12 0-1 01/27/04
Volatile Organics						
Methylene Chloride	0.020	4.0	0.0027	0.0028	0.0029	0.0028
Semivolatile Organics						
Benzo(a)pyrene	0.065	--	0.18	0.18	0.19	0.19
Dioxins/Furans						
Total TEQs (WHO TEFs)	1.80E-06	--	2.90E-05	1.00E-05	5.50E-07	2.50E-06
Inorganics						
Arsenic	4.10	--	4.50	4.00	6.30	2.00

Sample ID: Sample Depth(Feet): Date Collected:	RAA5-G18 0-1 02/27/04	RAA5-H20 0-1 02/27/04	RAA5-H22 0-1 02/24/04	RAA5-H24 0-1 02/24/04	RAA5-I17 0-1 03/02/04	RAA5-I23 0-1 02/23/04
Volatile Organics						
Methylene Chloride	0.0027	0.0028	0.0029	0.0030	0.0028	0.0029
Semivolatile Organics						
Benzo(a)pyrene	0.18	0.19	0.20	0.20	0.19	0.19
Dioxins/Furans						
Total TEQs (WHO TEFs)	1.30E-06	1.00E-05	1.10E-05	--	6.60E-05	2.50E-05
Inorganics						
Arsenic	8.00	5.20	7.40	R	15.0	3.50

Sample ID: Sample Depth(Feet): Date Collected:	RAA5-J21 0-1 03/02/04	Maximum Sample Result	Arithmetic Average Concentration (See Note 3)	MCP Method 1 S-2 GW-2/GW-3 Soil Standard (See Note 4)	Constituent Exceeds MCP Method 1 Soil Standard ? (See Note 5)
Volatile Organics					
Methylene Chloride	0.0028	NA (See Note 5)	0.31	20	No
Semivolatile Organics					
Benzo(a)pyrene	0.19	NA (See Note 5)	0.18	4	No
Dioxins/Furans					
Total TEQs (WHO TEFs)	4.70E-05	6.60E-05	NA (See Note 5)	5.00E-03	No
Inorganics					
Arsenic	6.50	NA (See Note 5)	6.05	20	No

Notes:

- Total 2,3,7,8-TCDD toxicity equivalency quotients (TEQs) were calculated using World Health Organization (WHO) Toxicity Equivalency Factors (TEFs) for all PCDD/PCDF compounds. Where individual compounds were not detected, a value of one-half the analytical detection limit was used to calculate the TEQ concentrations.
- With the exception of Total TEQs, constituents evaluated above have a maximum sample result that exceeds their respective EPA Region 9 Industrial PRGs or surrogate PRGs.
- Non-detect sample results included as one-half the detection limit in the calculation of arithmetic average concentrations and presented in bold.
- The Method 1 S-2 soil standards listed are those associated with GW-2 or GW-3 groundwater (whichever is more stringent), except for Dioxin/Furan Total TEQs. Total TEQs are compared to the EPA PRGs for such TEQs set out in Attachment F of the *Statement of Work for Removal Actions Outside the River (SOW)* or other TEQ comparison criteria utilized during previous evaluations.
- Arithmetic average concentrations of all constituents, except Total TEQs, are compared to Method 1 Soil Standards. For TEQs, the maximum concentration is compared to the appropriate EPA PRG (or other comparison criterion).
- R = Rejected result.

**TABLE 7
EXISTING CONDITIONS - COMPARISON TO METHOD 1 SOIL STANDARDS
1- TO 6-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results in ppm, dry weight)**

Sample ID:	ES1-28	PS-W-94B	PS-W-96B	PS-W-97B	RAA5-C28	RAA5-C28
Sample Depth(Feet):	4-6	2-6	2-6	2-6	1-6	4-6
Date Collected:	05/15/96	08/01/89	08/01/89	08/01/89	01/07/04	01/07/04
Volatile Organics						
Methylene Chloride	0.0060	340	9.0	7.0	--	0.0028
Semivolatile Organics						
Benzo(a)pyrene	0.38	--	--	--	0.19	--
Inorganics						
Arsenic	6.00	--	--	--	6.30	--
Sample ID:	RAA5-E29	RAA5-E29	RAA5-F16	RAA5-F16	RAA5-G12	RAA5-G12
Sample Depth(Feet):	1-6	4-6	1-6	4-6	1-6	4-6
Date Collected:	01/12/04	01/12/04	03/01/04	03/01/04	01/27/04	01/27/04
Volatile Organics						
Methylene Chloride	--	0.0028	--	0.0028	--	0.0027
Semivolatile Organics						
Benzo(a)pyrene	0.19	--	0.19	--	1.8	--
Inorganics						
Arsenic	5.60	--	7.20	--	6.70	--

See Notes on Page 2

**TABLE 7
EXISTING CONDITIONS - COMPARISON TO METHOD 1 SOIL STANDARDS
1- TO 6-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results in ppm, dry weight)**

Sample ID: Sample Depth(Feet): Date Collected:	RAA5-G18 1-6 02/27/04	RAA5-G18 4-6 02/27/04	RAA5-H22 1-3 02/24/04	RAA5-H22 1-6 02/24/04	RAA5-I17 1-6 03/02/04	RAA5-I17 2-4 03/02/04
Volatile Organics						
Methylene Chloride	--	0.0028	0.0029	--	--	0.0028
Semivolatile Organics						
Benzo(a)pyrene	0.19	--	--	0.19	0.20	--
Inorganics						
Arsenic	8.10	--	--	4.80	7.00	--

Sample ID: Sample Depth(Feet): Date Collected:	RAA5-J21 1-6 03/02/04	RAA5-J21 3-5 03/02/04	Arithmetic Average Concentration (See Note 2)	MCP Method 1 S-2 GW-2/GW-3 Soil Standard (See Note 3)	Constituent Exceeds MCP Method 1 Soil Standard ? (See Note 4)
Volatile Organics					
Methylene Chloride	--	0.0026	29.7	20	Yes
Semivolatile Organics					
Benzo(a)pyrene	0.17	--	0.4	4	No
Inorganics					
Arsenic	12.0	--	7.1	20	No

Notes:

1. Constituents evaluated above have a maximum sample result that exceeds their respective EPA Region 9 Industrial PRGs or surrogate PRGs.
2. Non-detect sample results included as one-half the detection limit in the calculation of arithmetic average concentrations and presented in bold.
3. The Method 1 S-2 soil standards listed are those associated with GW-2 or GW-3 groundwater (whichever is more stringent).
4. Arithmetic average concentrations of all constituents are compared to the Method 1 Soil Standards.
5. -- = Constituent not subject to analysis.

**TABLE 8
EXISTING CONDITIONS - COMPARISON TO METHOD 1 SOIL STANDARDS
0- TO 15-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results in ppm, dry weight)**

Sample ID: Sample Depth(Feet): Date Collected:	ES1-11 0-2 05/13/96	PS-W-98A 0-2 08/01/89	RAA5-E12 0-1 03/02/04	RAA5-E29 0-1 01/12/04	RAA5-F16 0-1 03/01/04	RAA5-G12 0-1 01/27/04	RAA5-G18 0-1 02/27/04
Volatile Organics							
Methylene Chloride	0.020	4.0	0.0027	0.0028	0.0029	0.0028	0.0027
Semivolatile Organics							
Benzo(a)pyrene	0.065	--	0.18	0.18	0.19	0.19	0.18
Dioxins/Furans							
Total TEQs (WHO TEFs)	(See Note 9)	(See Note 9)	(See Note 9)	(See Note 9)	(See Note 9)	(See Note 9)	(See Note 9)
Inorganics							
Arsenic	4.10	--	4.50	4.00	6.30	2.00	8.00
Sample ID: Sample Depth(Feet): Date Collected:	RAA5-H20 0-1 02/27/04	RAA5-H22 0-1 02/24/04	RAA5-H24 0-1 02/24/04	RAA5-I17 0-1 03/02/04	RAA5-I23 0-1 02/23/04	RAA5-J21 0-1 03/02/04	ES1-28 4-6 05/15/96
Volatile Organics							
Methylene Chloride	0.0028	0.0029	0.0030	0.0028	0.0029	0.0028	0.0060
Semivolatile Organics							
Benzo(a)pyrene	0.19	0.20	0.20	0.19	0.19	0.19	0.38
Dioxins/Furans							
Total TEQs (WHO TEFs)	(See Note 9)	(See Note 9)	(See Note 9)	(See Note 9)	(See Note 9)	(See Note 9)	3.00E-07
Inorganics							
Arsenic	5.20	7.40	R	15.0	3.50	6.50	6.00
Sample ID: Sample Depth(Feet): Date Collected:	PS-W-94B 2-6 08/01/89	PS-W-96B 2-6 08/01/89	PS-W-97B 2-6 08/01/89	RAA5-C28 1-6 01/07/04	RAA5-C28 4-6 01/07/04	RAA5-E29 1-6 01/12/04	RAA5-E29 4-6 01/12/04
Volatile Organics							
Methylene Chloride	340	9.0	7.0	--	0.0028	--	0.0028
Semivolatile Organics							
Benzo(a)pyrene	--	--	--	0.19	--	0.19	--
Dioxins/Furans							
Total TEQs (WHO TEFs)	--	--	--	1.20E-06	--	8.10E-06	--
Inorganics							
Arsenic	--	--	--	6.30	--	5.60	--

See Notes on Page 3.

**TABLE 8
EXISTING CONDITIONS - COMPARISON TO METHOD 1 SOIL STANDARDS
0- TO 15-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results in ppm, dry weight)**

Sample ID: Sample Depth(Feet): Date Collected:	RAA5-F16 1-6 03/01/04	RAA5-F16 4-6 03/01/04	RAA5-G12 1-6 01/27/04	RAA5-G12 4-6 01/27/04	RAA5-G18 1-6 02/27/04	RAA5-G18 4-6 02/27/04	RAA5-H22 1-3 02/24/04
Volatile Organics							
Methylene Chloride	--	0.0028	--	0.0027	--	0.0028	0.0029
Semivolatile Organics							
Benzo(a)pyrene	0.19	--	1.8	--	0.19	--	--
Dioxins/Furans							
Total TEQs (WHO TEFs)	3.10E-07	--	3.10E-06	--	7.60E-07	--	--
Inorganics							
Arsenic	7.20	--	6.70	--	8.10	--	--
Sample ID: Sample Depth(Feet): Date Collected:	RAA5-H22 1-6 02/24/04	RAA5-I17 1-6 03/02/04	RAA5-I17 2-4 03/02/04	RAA5-J21 1-6 03/02/04	RAA5-J21 3-5 03/02/04	PS-W-95C 6-10 08/01/89	RAA5-E12 6-15 03/02/04
Volatile Organics							
Methylene Chloride	--	--	0.0028	--	0.0026	25	--
Semivolatile Organics							
Benzo(a)pyrene	0.19	0.20	--	0.17	--	--	0.19
Dioxins/Furans							
Total TEQs (WHO TEFs)	--	3.20E-05	--	3.50E-06	--	--	1.50E-05
Inorganics							
Arsenic	4.80	7.00	--	12.0	--	--	6.45
Sample ID: Sample Depth(Feet): Date Collected:	RAA5-E12 11-13 03/02/04	RAA5-H20 6-15 02/27/04	RAA5-H20 12-14 02/27/04	RAA5-H28 6-15 03/02/04	RAA5-H28 10-12 03/02/04	RAA5-I23 6-15 02/23/04	RAA5-I23 10-12 02/23/04
Volatile Organics							
Methylene Chloride	0.0028	--	0.0028	--	0.0028	--	0.0029
Semivolatile Organics							
Benzo(a)pyrene	--	0.18	--	0.19	--	0.19	--
Dioxins/Furans							
Total TEQs (WHO TEFs)	--	1.90E-06	--	--	--	9.20E-06	--
Inorganics							
Arsenic	--	6.30	--	5.50	--	6.90	--

See Notes on Page 3.

**TABLE 8
EXISTING CONDITIONS - COMPARISON TO METHOD 1 SOIL STANDARDS
0- TO 15-FOOT DEPTH INCREMENT**

**BUILDING 100 AVERAGING AREA - EAST STREET AREA 2-NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results in ppm, dry weight)**

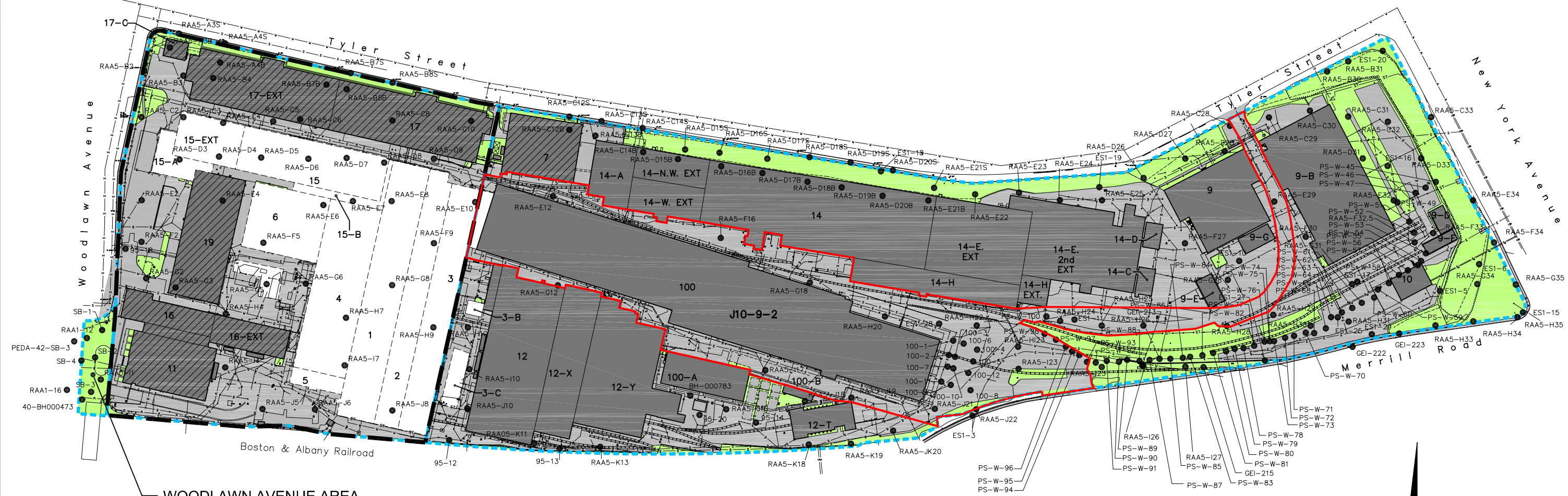
Sample ID: Sample Depth(Feet): Date Collected:	Maximum Sample Result	Arithmetic Average Concentration (See Note 3)	MCP Method 1 S-3 GW-2/GW-3 Soil Standard (See Note 4)	Constituent Exceeds Initial Comparison Criteria? (See Note 5)
Volatile Organics				
Methylene Chloride	NA (See Note 5)	12.8	20	No
Semivolatile Organics				
Benzo(a)pyrene	NA (See Note 5)	0.3	30	No
Dioxins/Furans				
Total TEQs (WHO TEFs)	3.20E-05	NA (See Note 5)	2.00E-02	No
Inorganics				
Arsenic	NA (See Note 5)	6.5	20	No

Notes:

- Total 2,3,7,8-TCDD toxicity equivalency quotients (TEQs) were calculated using World Health Organization (WHO) Toxicity Equivalency Factors (TEFs) for all PCDD/PCDF compounds. Where individual compounds were not detected, a value of one-half the analytical detection limit was used to calculate the TEQ concentrations.
- With the exception of Total TEQs, constituents evaluated above have a maximum sample result that exceeds their respective EPA Region 9 Industrial PRGs or surrogate PRGs.
- Non-detect sample results included as one-half the detection limit in the calculation of arithmetic average concentrations and presented in bold.
- The Method 1 S-3 soil standards listed are those associated with GW-2 or GW-3 groundwater (whichever is more stringent), except for Dioxin/Furan Total TEQs. Total TEQs are compared to the EPA PRGs for such TEQs set out in Attachment F of the *Statement of Work for Removal Actions Outside the River* (SOW) or other TEQ comparison criteria utilized during previous evaluations.
- Arithmetic average concentrations of all constituents, except Total TEQs, are compared to Method 1 Soil Standards. For TEQs, the maximum concentration is compared to the appropriate EPA PRG (or other comparison criterion).
- = Constituent not subject to analysis.
- R = Rejected result.
- Total TEQ concentrations in italics represent the maximum value for the sample location/depth increment in question.
- Total TEQs (WHO TEFs) were evaluated for the 1- to 15-foot depth increment only.

Figures

I:\9-85-DHWI\SYR-85-NES\GIS\LAF LAYER: ON* OFF=REF*
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 PENTABLE.PLT, FULL CTB PRINTED:9/26/2007 2:11 PM BY:LFORAKER
 PROJECT NAME: IMAGES:
 40469001
 40469002



WOODLAWN AVENUE AREA

- NOTES:**
1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
 2. NOT ALL PHYSICAL FEATURES SHOWN.

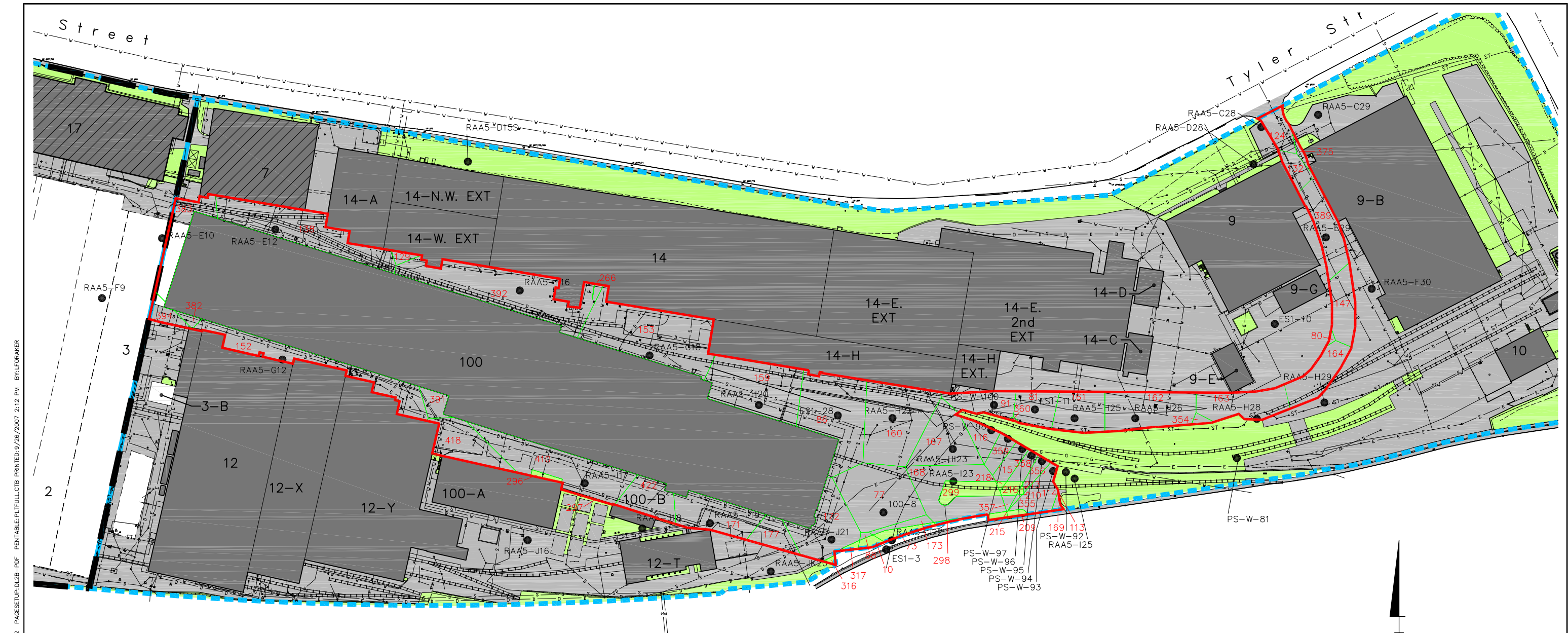
LEGEND	
	REMOVAL ACTION AREA BOUNDARY
	BUILDING
	BUILDING TO BE DEMOLISHED
	FORMER BUILDING LOCATION
14	BUILDING ID
	PAVED AREA
	UNPAVED AREA
	EXISTING SOIL SAMPLING LOCATION
	APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
	PROPOSED BUILDING 100 AVERAGING AREA
	STORM SEWER
	SANITARY SEWER
	WATER MAIN / FIRE PROTECTION MAIN
	STEAM LINE
	NATURAL GAS MAIN
	ELECTRIC/TELEPHONE CONDUIT
	LIGHT POLE
	CATCH BASIN
	DRAIN MANHOLE
	UTILITY POLE
	GAS VALVE
	FIRE HYDRANT
	WATER SHUTOFF



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
EAST STREET AREA 2-NORTH
PROPOSED BUILDING 100
AVERAGING AREA

infrastructure, environment, facilities

FIGURE
1



NOTES:

1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
2. NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND

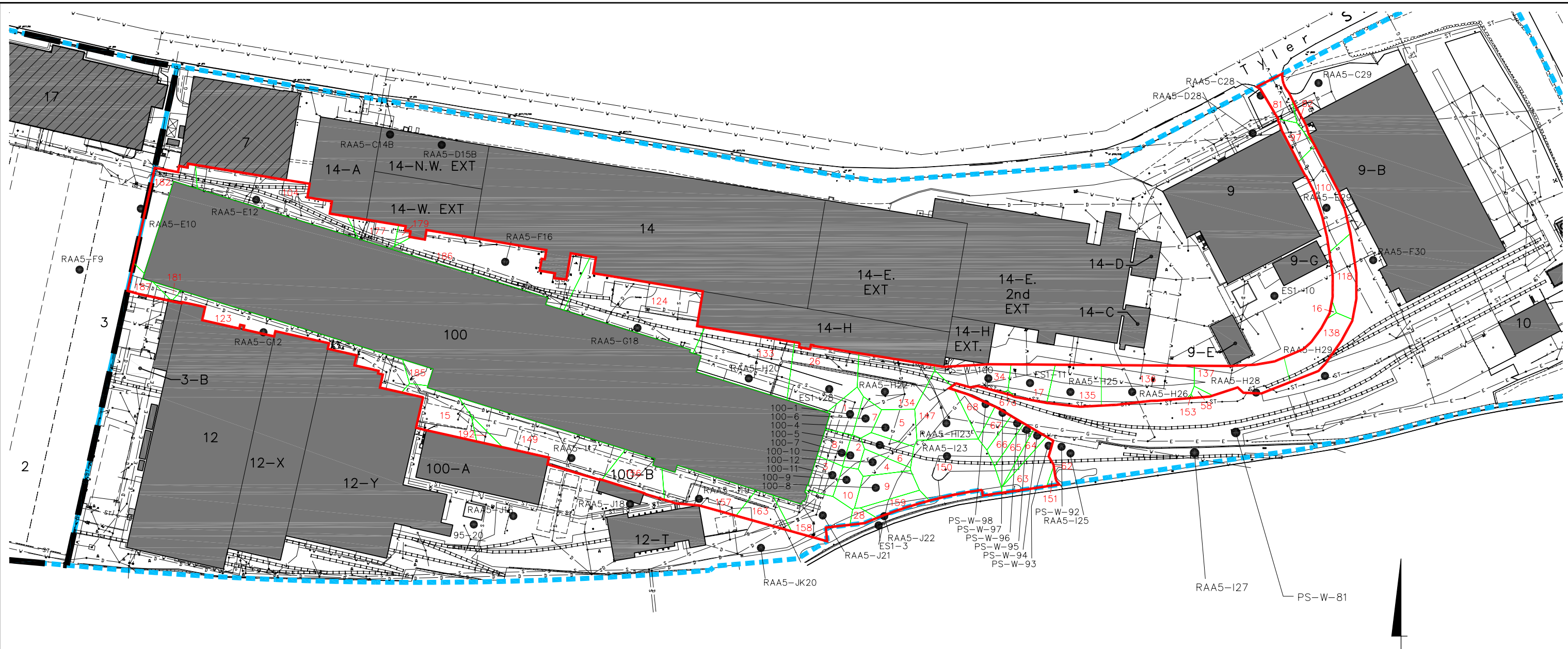
- REMOVAL ACTION AREA BOUNDARY
- BUILDING
- BUILDING TO BE DEMOLISHED
- FORMER BUILDING LOCATION
- BUILDING ID
- PAVED AREA
- UNPAVED AREA
- EXISTING SOIL SAMPLING LOCATION
- APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
- PROPOSED BUILDING 100 AVERAGING AREA
- STORM SEWER
- SANITARY SEWER
- WATER MAIN / FIRE PROTECTION MAIN
- STEAM LINE
- NATURAL GAS MAIN
- ELECTRIC/TELEPHONE CONDUIT
- LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- POLYGON ID

GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
**EAST STREET AREA 2-NORTH - BUILDING 100
 AVERAGING AREA**
THEISSEN POLYGON MAP
0- TO 1-FOOT DEPTH INTERVAL
(ASSUMING ALL SLABS LEFT IN PLACE)



[SYR-85-DW1] SYR-85-DW1 GNS LAF LAYER: ON=1, OFF=REF*, SPOLY=AREA
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 PROJECT NAME: IMAGES:
 40469020
 40469020
 40469020

[SYR-85-DMW] SYR-85-DMW GNS IAF LAYER: ON=*, OFF=*REF*, hatch=asphalt*, hatch=brick*, hatch=concrete*, hatch=unpaved*, SPOLY-AREA
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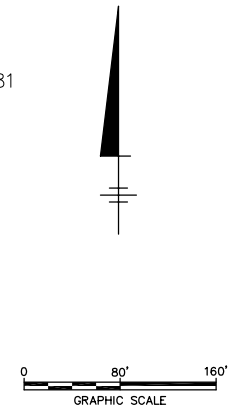


NOTES:

1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
2. NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND

- REMOVAL ACTION AREA BOUNDARY
- BUILDING
- BUILDING TO BE DEMOLISHED
- FORMER BUILDING LOCATION
- 14** BUILDING ID
- ES1-3 EXISTING SOIL SAMPLING LOCATION
- APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
- PROPOSED BUILDING 100 AVERAGING AREA
- STORM SEWER
- SANITARY SEWER
- WATER MAIN / FIRE PROTECTION MAIN
- STEAM LINE
- NATURAL GAS MAIN
- ELECTRIC/TELEPHONE CONDUIT
- LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 70** POLYGON ID

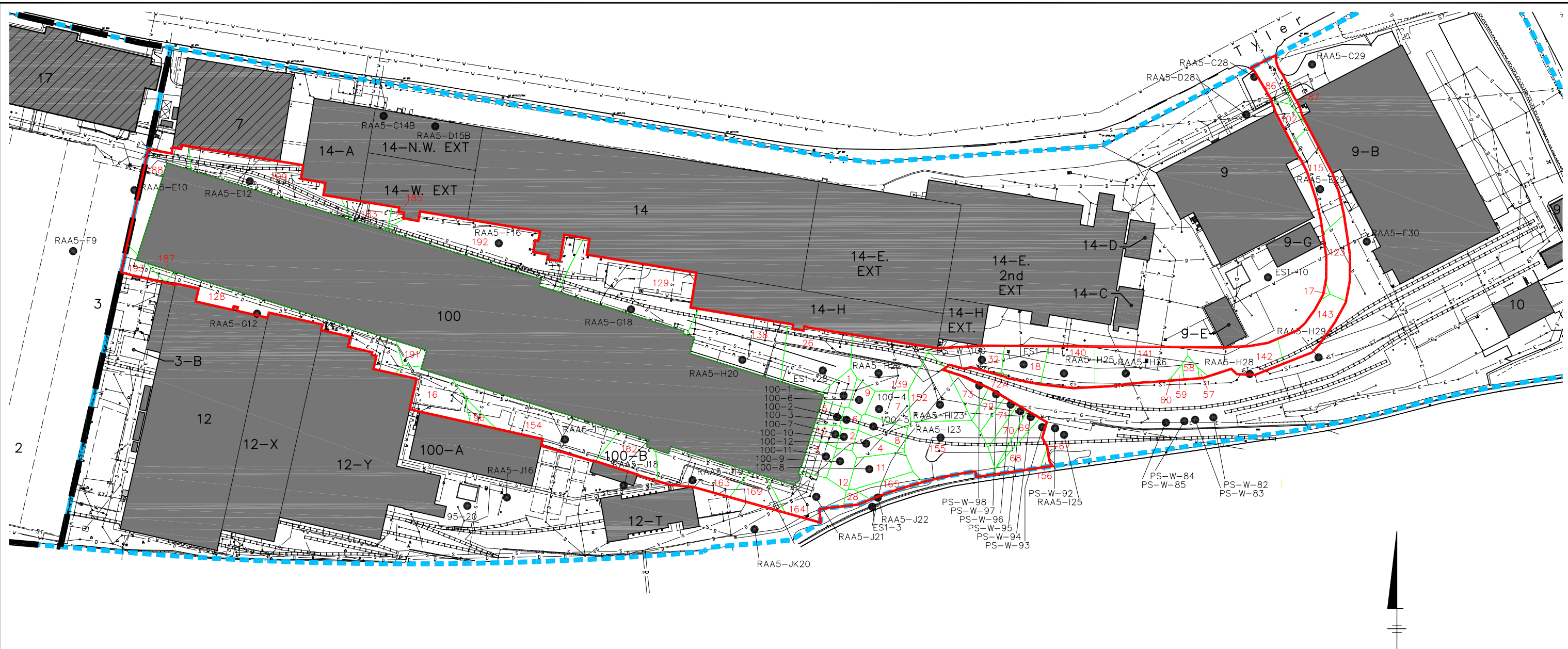


GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
EAST STREET AREA 2-NORTH - BUILDING 100 AVERAGING AREA

THEISSEN POLYGON MAP
1- TO 2-FOOT DEPTH INTERVAL

FIGURE
3

[SYR-85-DW1] SYR-85-DW1 GNS LAF LAYER: ON=*, OFF=REF*, Hatch=asphalt*, Hatch=brick*, Hatch=concrete*, Hatch=improvet*, SPPOLY-AREA
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 40469000



NOTES:

1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
2. NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND

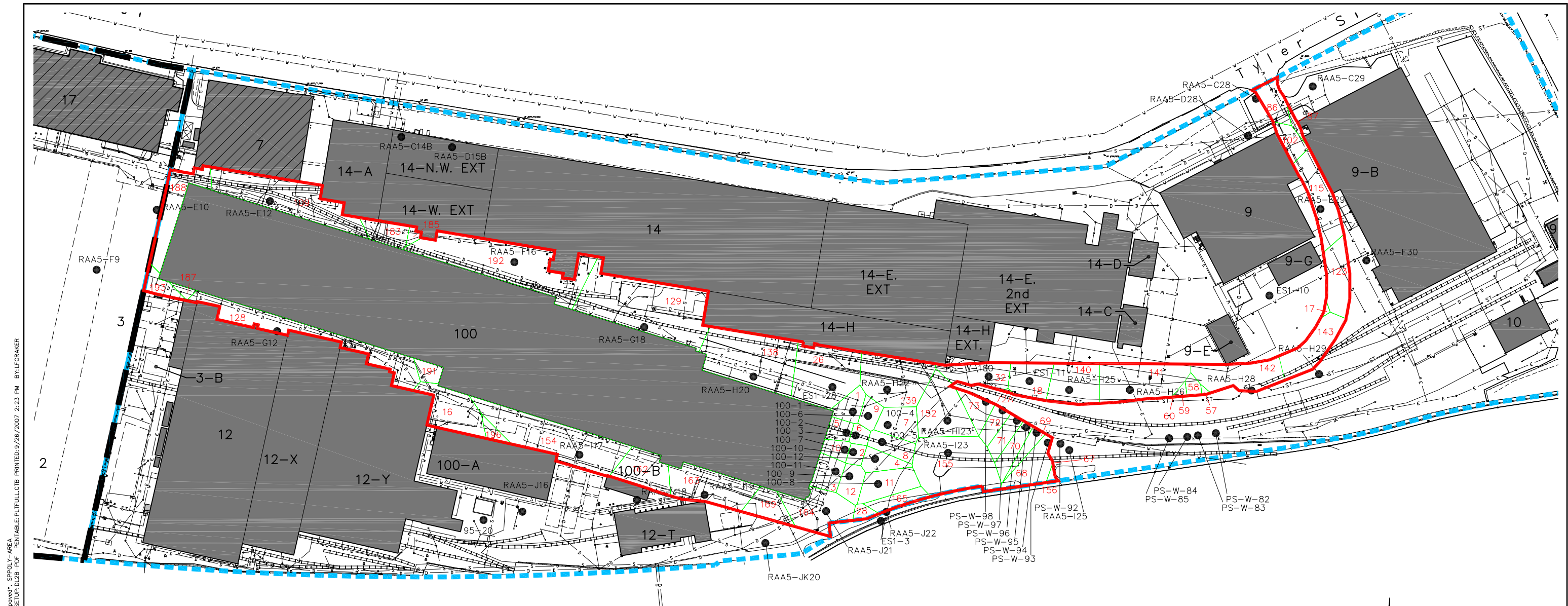
- - - - - REMOVAL ACTION AREA BOUNDARY
- BUILDING
- BUILDING TO BE DEMOLISHED
- FORMER BUILDING LOCATION
- 14** BUILDING ID
- ES1-3 EXISTING SOIL SAMPLING LOCATION
- APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
- — — — — PROPOSED BUILDING 100 AVERAGING AREA
- STORM SEWER
- SANITARY SEWER
- WATER MAIN / FIRE PROTECTION MAIN
- STEAM LINE
- NATURAL GAS MAIN
- ELECTRIC/TELEPHONE CONDUIT
- LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 70 POLYGON ID

GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
**EAST STREET AREA 2-NORTH - BUILDING 100
 AVERAGING AREA**

**THEISSEN POLYGON MAP
 2- TO 3-FOOT DEPTH INTERVAL**

infrastructure, environment, facilities

FIGURE
4

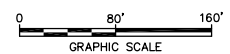


NOTES:

1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
2. NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND

- REMOVAL ACTION AREA BOUNDARY
- BUILDING
- BUILDING TO BE DEMOLISHED
- FORMER BUILDING LOCATION
- 14** BUILDING ID
- ES1-3 EXISTING SOIL SAMPLING LOCATION
- APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
- PROPOSED BUILDING 100 AVERAGING AREA
- STORM SEWER
- SANITARY SEWER
- WATER MAIN / FIRE PROTECTION MAIN
- STEAM LINE
- NATURAL GAS MAIN
- ELECTRIC/TELEPHONE CONDUIT
- LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 70** POLYGON ID



GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
**EAST STREET AREA 2-NORTH - BUILDING 100
AVERAGING AREA**

**THEISSEN POLYGON MAP
3- TO 5-FOOT DEPTH INTERVAL**

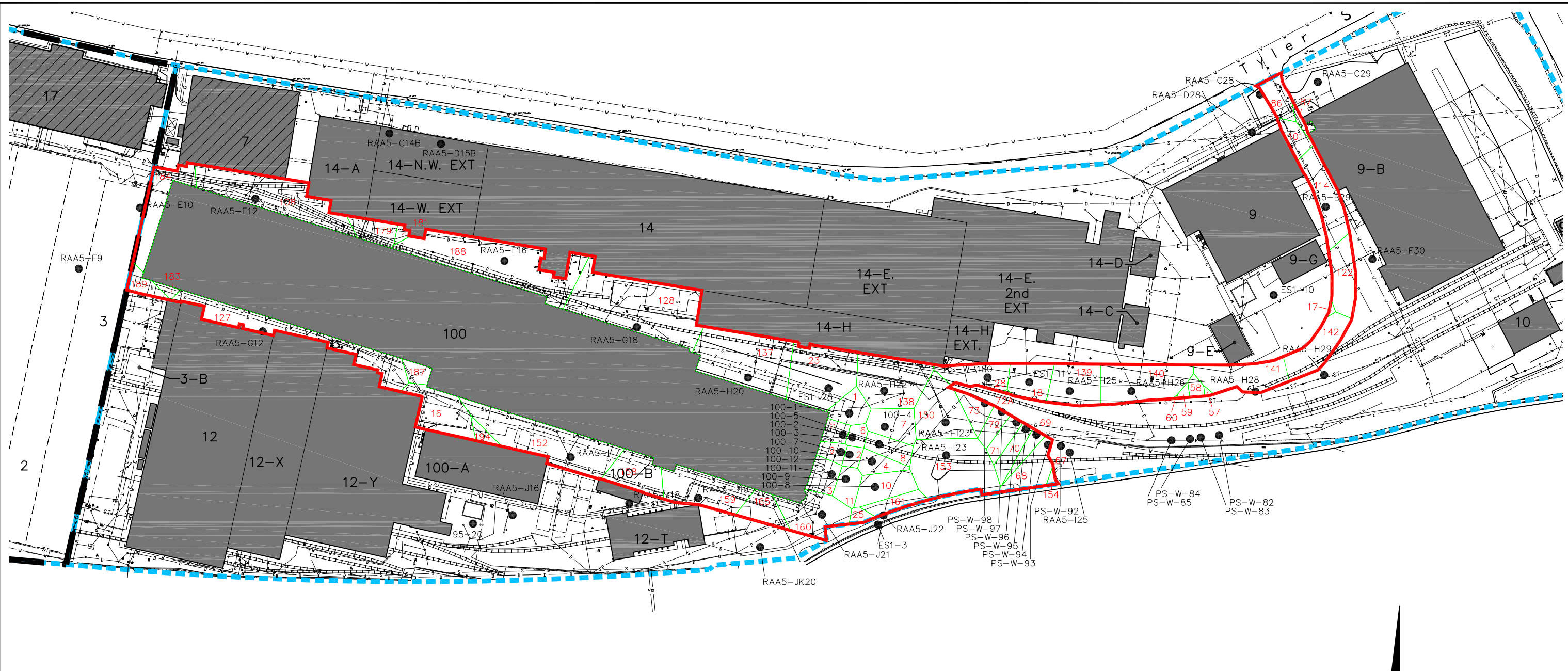


FIGURE

5

[SYR-85-DMW] SYR-85-DMW GNS IAF LAYER: ON=*, OFF=*REF*, hatch=asphalt*, hatch=brick*, hatch=concrete*, hatch=improved*, SPOLY-AREA
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 PLOT TIME: 2:23 PM
 PLOT USER: LFORAKER
 PLOT DEVICE: HP DesignJet 500

[SYR-85-DMW] SYR-85-DMW GNS LAF LAYER: ON=*, OFF=REF*, hatch=asphalt*, hatch=brick*, hatch=concrete*hatch=tunnel*, hatch=upvcwet*, SPOLY=AREA
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NOTES:

1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
2. NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND

- - - - - REMOVAL ACTION AREA BOUNDARY
- BUILDING
- BUILDING TO BE DEMOLISHED
- FORMER BUILDING LOCATION
- 14** BUILDING ID
- EXISTING SOIL SAMPLING LOCATION
- APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
- PROPOSED BUILDING 100 AVERAGING AREA
- STORM SEWER
- SANITARY SEWER
- WATER MAIN / FIRE PROTECTION MAIN
- STEAM LINE
- NATURAL GAS MAIN
- ELECTRIC/TELEPHONE CONDUIT
- LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 70** POLYGON ID

GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
**EAST STREET AREA 2-NORTH - BUILDING 100
 AVERAGING AREA**

**THEISSEN POLYGON MAP
 5- TO 6-FOOT DEPTH INTERVAL**

infrastructure. environment. facilities

FIGURE
6



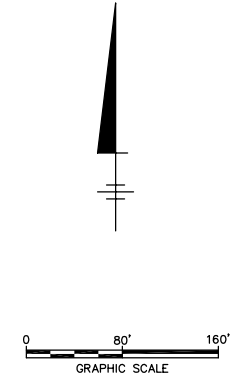
[SYR=85-DMW] SYR=85-DMW GNS LAF LAYER: ON=*, OFF=*REF*, hatch=asphalt*, hatch=brick*, hatch=concrete*, hatch=unpaved*, SPPOOLY-AREA
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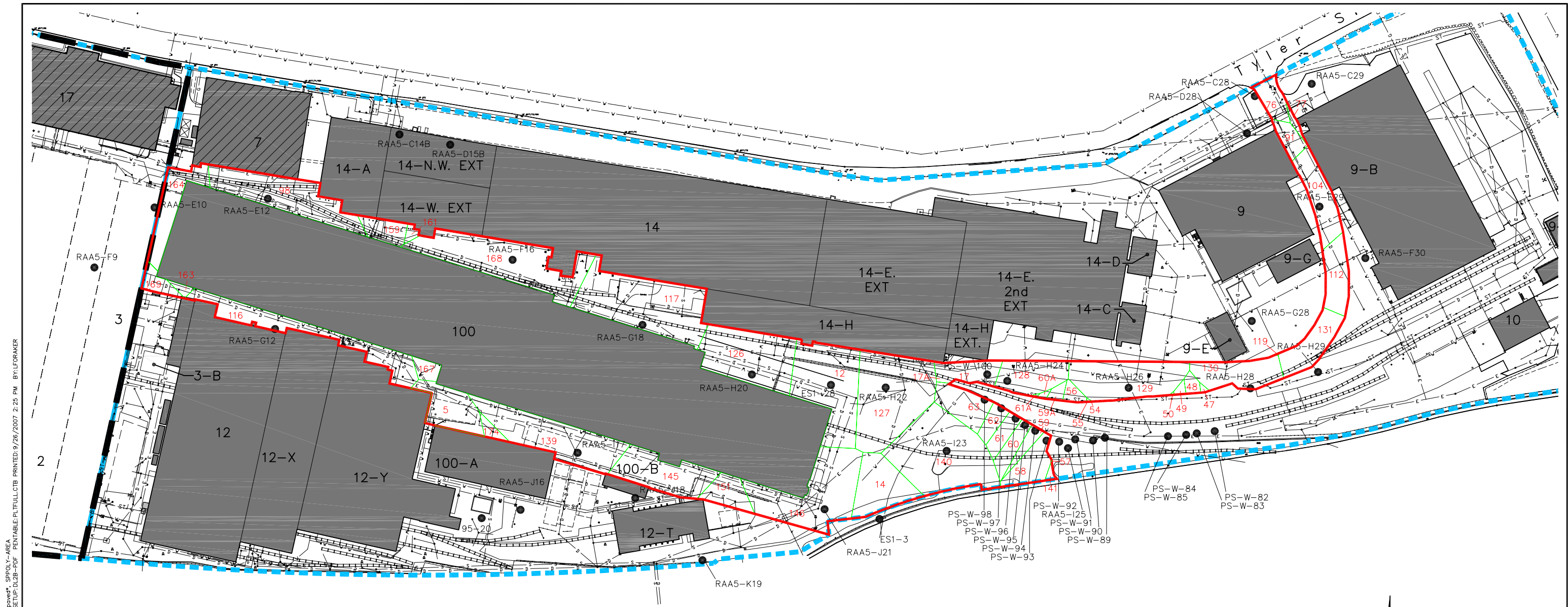
- BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
- NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND

- REMOVAL ACTION AREA BOUNDARY
- BUILDING
- BUILDING TO BE DEMOLISHED
- FORMER BUILDING LOCATION
- 14** BUILDING ID
- ES1-3 EXISTING SOIL SAMPLING LOCATION
- APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
- PROPOSED BUILDING 100 AVERAGING AREA
- STORM SEWER
- SANITARY SEWER
- WATER MAIN / FIRE PROTECTION MAIN
- STEAM LINE
- NATURAL GAS MAIN
- ELECTRIC/TELEPHONE CONDUIT
- * LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 70** POLYGON ID



GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS EAST STREET AREA 2-NORTH - BUILDING 100 AVERAGING AREA	
THEISSEN POLYGON MAP 6- TO 7-FOOT DEPTH INTERVAL	
	FIGURE 7



NOTES:

1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
2. NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND

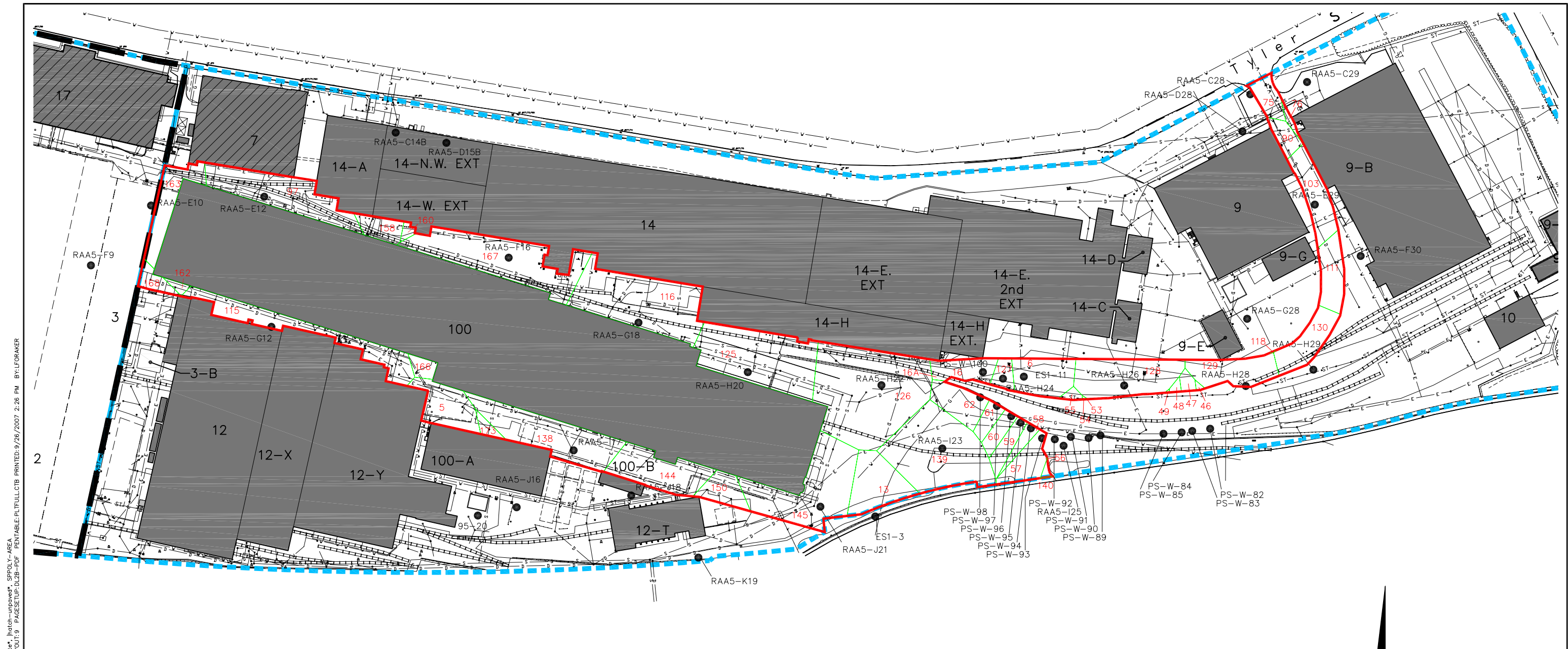
- REMOVAL ACTION AREA BOUNDARY
- BUILDING
- BUILDING TO BE DEMOLISHED
- FORMER BUILDING LOCATION
- 14** BUILDING ID
- ES1-3 EXISTING SOIL SAMPLING LOCATION
- APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
- PROPOSED BUILDING 100 AVERAGING AREA
- STORM SEWER
- SANITARY SEWER
- WATER MAIN / FIRE PROTECTION MAIN
- STEAM LINE
- NATURAL GAS MAIN
- ELECTRIC/TELEPHONE CONDUIT
- LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 70** POLYGON ID

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
**EAST STREET AREA 2-NORTH - BUILDING 100
AVERAGING AREA**

**THEISSEN POLYGON MAP
7- TO 8-FOOT DEPTH INTERVAL**

FIGURE
8

[SYR-85-DW1 SYR-85-DW1 GNS LAF LAYER: ON=*, OFF=*REF*, hatch=asphalt*, hatch=brick*, hatch=concrete*, hatch=unpaved*, SPPOLY-AREA G: CAD_GE-CAD_GE_ACTIVE\N\40469025\ES2-N\POLYGON\40469025.DWG SAVER: 9/26/2007 2:25 PM LAYOUT: 8 PAGESETUP: D12B-PDF PENTABLE: PUFULLCTB PRINTED: 9/26/2007 2:25 PM BY: LFORAKER
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NOTES:

1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
2. NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND

- REMOVAL ACTION AREA BOUNDARY
- BUILDING
- BUILDING TO BE DEMOLISHED
- FORMER BUILDING LOCATION
- 14** BUILDING ID
- ES1-3 EXISTING SOIL SAMPLING LOCATION
- APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
- PROPOSED BUILDING 100 AVERAGING AREA
- STORM SEWER
- SANITARY SEWER
- WATER MAIN / FIRE PROTECTION MAIN
- STEAM LINE
- NATURAL GAS MAIN
- ELECTRIC/TELEPHONE CONDUIT
- LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 70** POLYGON ID

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

**EAST STREET AREA 2-NORTH - BUILDING 100
AVERAGING AREA**

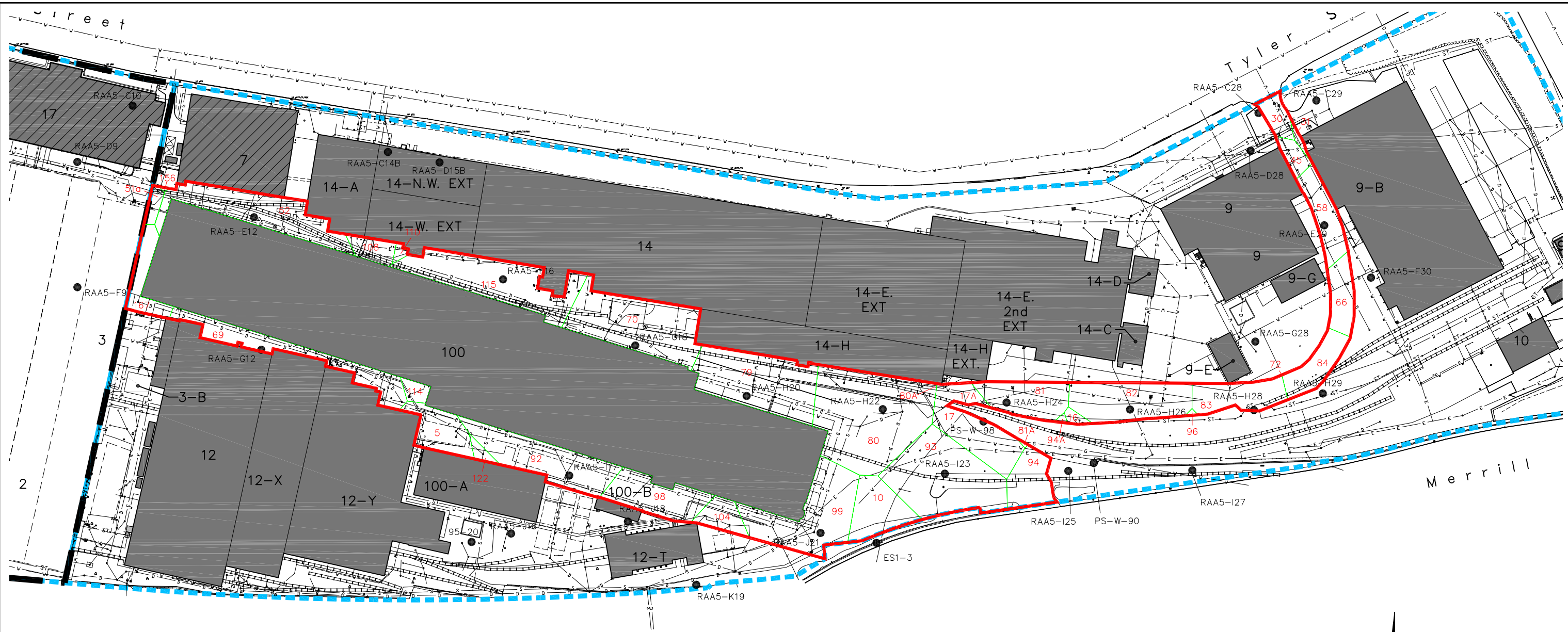
**THEISSEN POLYGON MAP
8- TO 10-FOOT DEPTH INTERVAL**

infrastructure. environment. facilities

FIGURE
9

[SYR-85-DMW] SYR-85-DMW GNS IAF LAYER: ON=*, OFF=REF*, hatch=asphalt*, hatch=brick*, hatch=concrete*, hatch=unpaved*, SPOLY-AREA
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[SYR-85-DMW] SYR-85-DMW GNS IAF LAYER: ON=*, OFF=*REF*, hatch=asphalt*, hatch=brick*, hatch=concrete*, hatch=unpaved*, SPOLY-AREA
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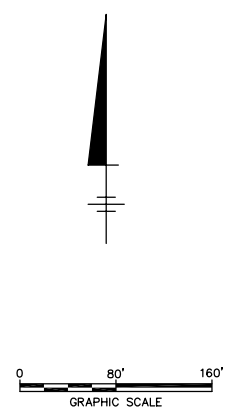


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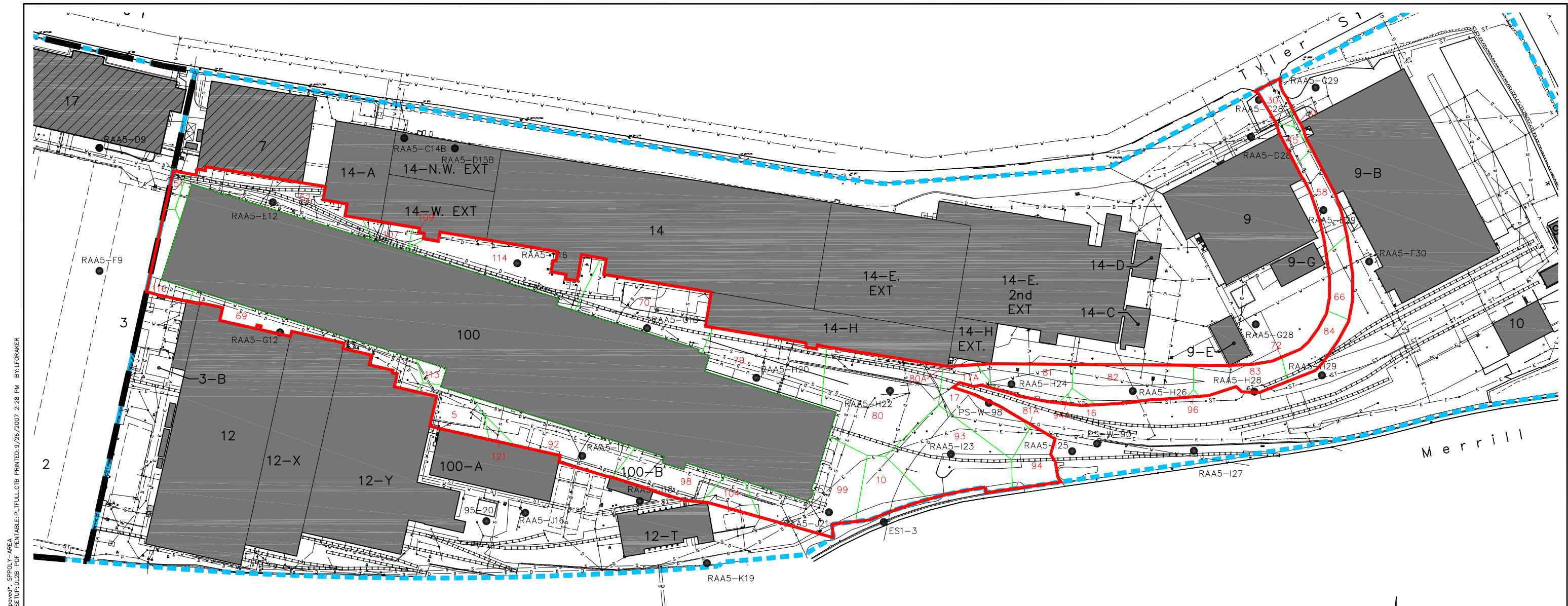
1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
2. NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND

- - - - - REMOVAL ACTION AREA BOUNDARY
- BUILDING
- BUILDING TO BE DEMOLISHED
- FORMER BUILDING LOCATION
- 14** BUILDING ID
- ES1-3 EXISTING SOIL SAMPLING LOCATION
- APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
- PROPOSED BUILDING 100 AVERAGING AREA
- STORM SEWER
- SANITARY SEWER
- WATER MAIN / FIRE PROTECTION MAIN
- STEAM LINE
- NATURAL GAS MAIN
- ELECTRIC/TELEPHONE CONDUIT
- LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 70 POLYGON ID










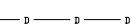
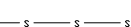



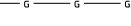








GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS EAST STREET AREA 2-NORTH - BUILDING 100 AVERAGING AREA	
THEISSEN POLYGON MAP 10- TO 11-FOOT DEPTH INTERVAL	
 <small>infrastructure, environment, facilities</small>	FIGURE 10



NOTES:

1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
2. NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND

-  REMOVAL ACTION AREA BOUNDARY
-  BUILDING
-  BUILDING TO BE DEMOLISHED
-  FORMER BUILDING LOCATION
- 14** BUILDING ID
-  ES1-3 EXISTING SOIL SAMPLING LOCATION
-  APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
-  PROPOSED BUILDING 100 AVERAGING AREA
-  STORM SEWER
-  SANITARY SEWER
-  WATER MAIN / FIRE PROTECTION MAIN
-  STEAM LINE
-  NATURAL GAS MAIN
-  ELECTRIC/TELEPHONE CONDUIT
-  LIGHT POLE
-  CATCH BASIN
-  DRAIN MANHOLE
-  UTILITY POLE
-  GAS VALVE
-  FIRE HYDRANT
-  WATER SHUTOFF
-  HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 70** POLYGON ID

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

**EAST STREET AREA 2-NORTH - BUILDING 100
AVERAGING AREA**

**THEISSEN POLYGON MAP
11- TO 12-FOOT DEPTH INTERVAL**


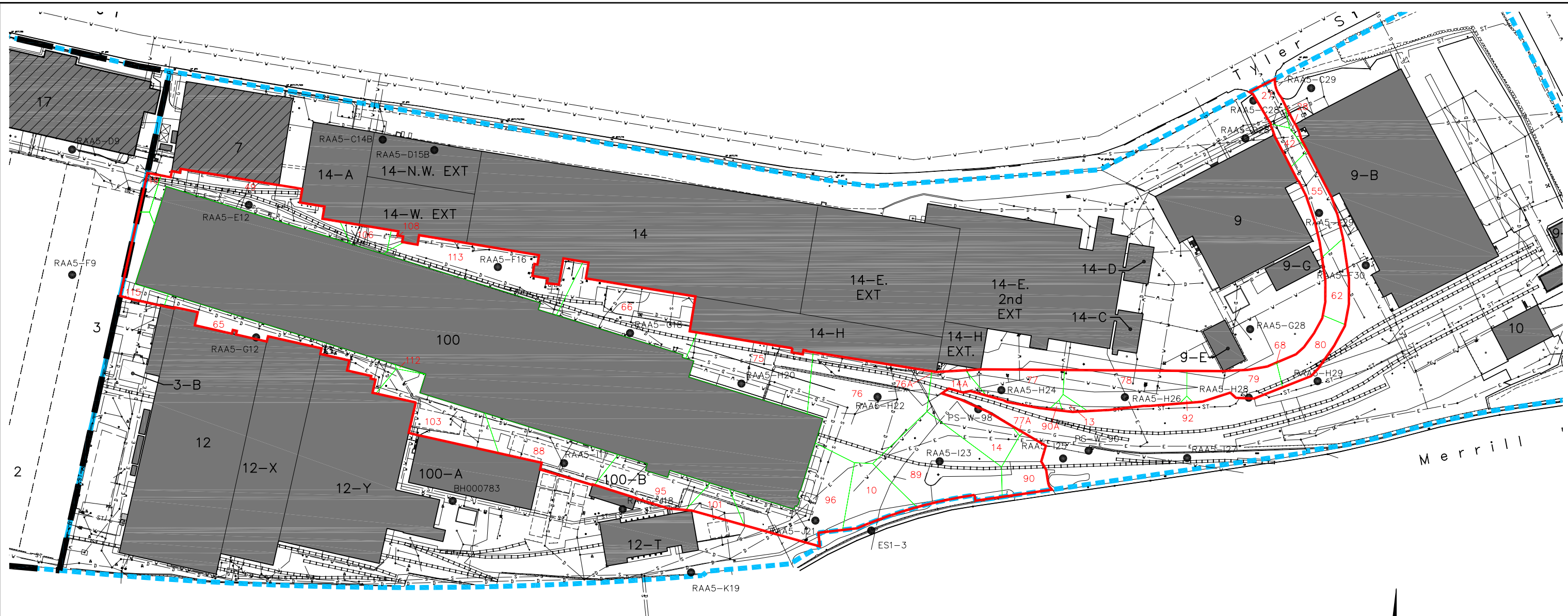
 **ARCADIS** BBL
infrastructure, environment, facilities

FIGURE
11

[SYR-85-DW1 SYR-85-DW1 GNS IAF LAYER: ON=*, OFF=*REF*, hatch=asphalt*, hatch=brick*, hatch=concrete*, hatch=improved*, SPPOLY-AREA
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[SYR-85-DMW] SYR-85-DMW GNS IAF LAYER: ON=*, OFF=*REF*, hatch=asphalt*, hatch=brick*, hatch=concrete*, hatch=upcast*, SPPOLY-AREA
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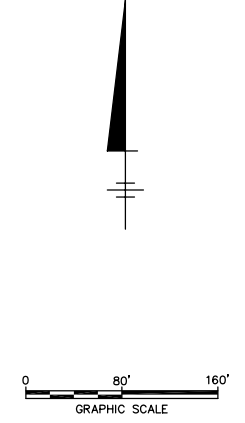


NOTES:

1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
2. NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND

- - - - - REMOVAL ACTION AREA BOUNDARY
- BUILDING
- BUILDING TO BE DEMOLISHED
- FORMER BUILDING LOCATION
- 14** BUILDING ID
- ES1-3 EXISTING SOIL SAMPLING LOCATION
- APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
- PROPOSED BUILDING 100 AVERAGING AREA
- STORM SEWER
- SANITARY SEWER
- WATER MAIN / FIRE PROTECTION MAIN
- STEAM LINE
- NATURAL GAS MAIN
- ELECTRIC/TELEPHONE CONDUIT
- LIGHT POLE
- CATCH BASIN
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- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 70** POLYGON ID



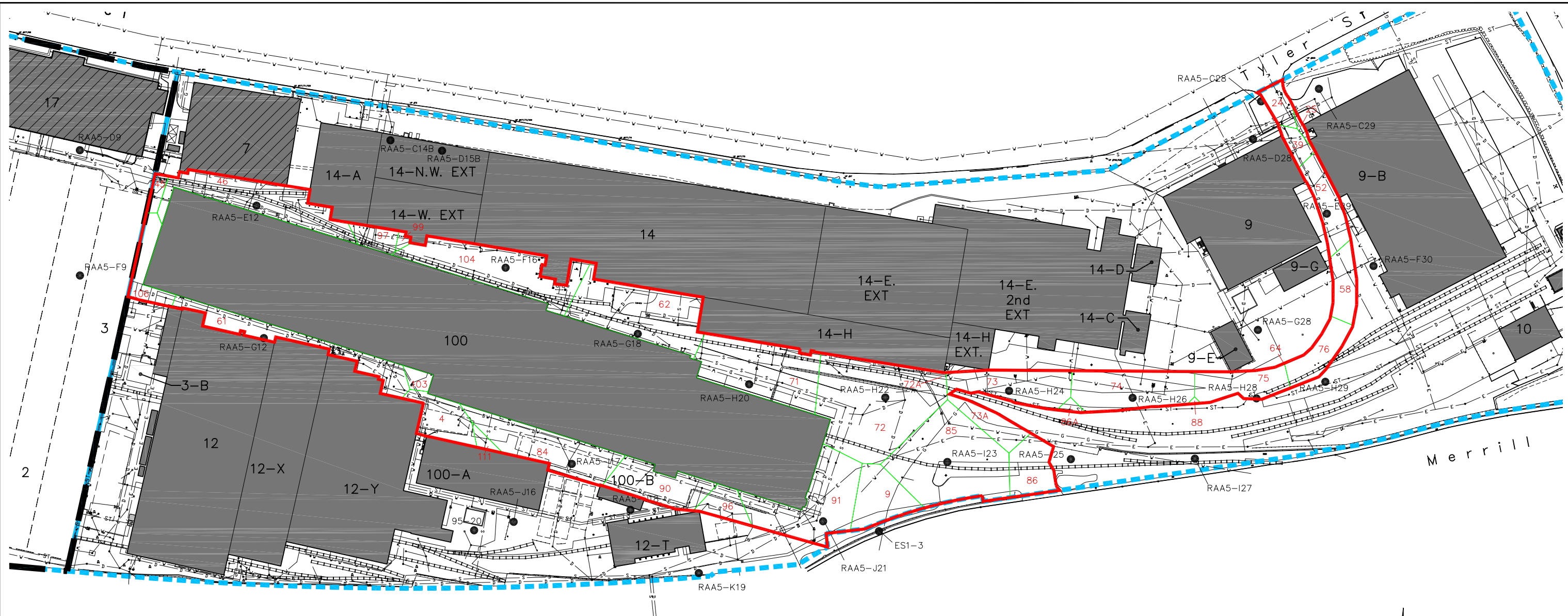
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

**EAST STREET AREA 2-NORTH - BUILDING 100
AVERAGING AREA**

**THEISSEN POLYGON MAP
12- TO 14-FOOT DEPTH INTERVAL**

FIGURE
12

[SYR-85-DW1 SYR-85-DW1 GNS LAF LAYER: ON=*, OFF=*REF*, Hatch=concrete*, Hatch=asphalt*, Hatch=brick*, Hatch=concrete*, Hatch=upcast*, SPOLY-AREA
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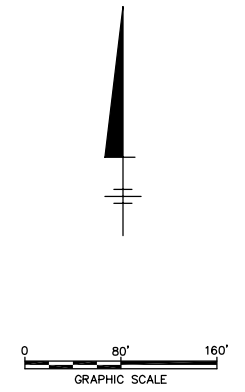


NOTES:

1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
2. NOT ALL PHYSICAL FEATURES SHOWN.

LEGEND

- - - - - REMOVAL ACTION AREA BOUNDARY
- BUILDING
- BUILDING TO BE DEMOLISHED
- FORMER BUILDING LOCATION
- 14** BUILDING ID
- ES1-3 EXISTING SOIL SAMPLING LOCATION
- APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)
- PROPOSED BUILDING 100 AVERAGING AREA
- STORM SEWER
- SANITARY SEWER
- WATER MAIN / FIRE PROTECTION MAIN
- STEAM LINE
- NATURAL GAS MAIN
- ELECTRIC/TELEPHONE CONDUIT
- LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 70 POLYGON ID

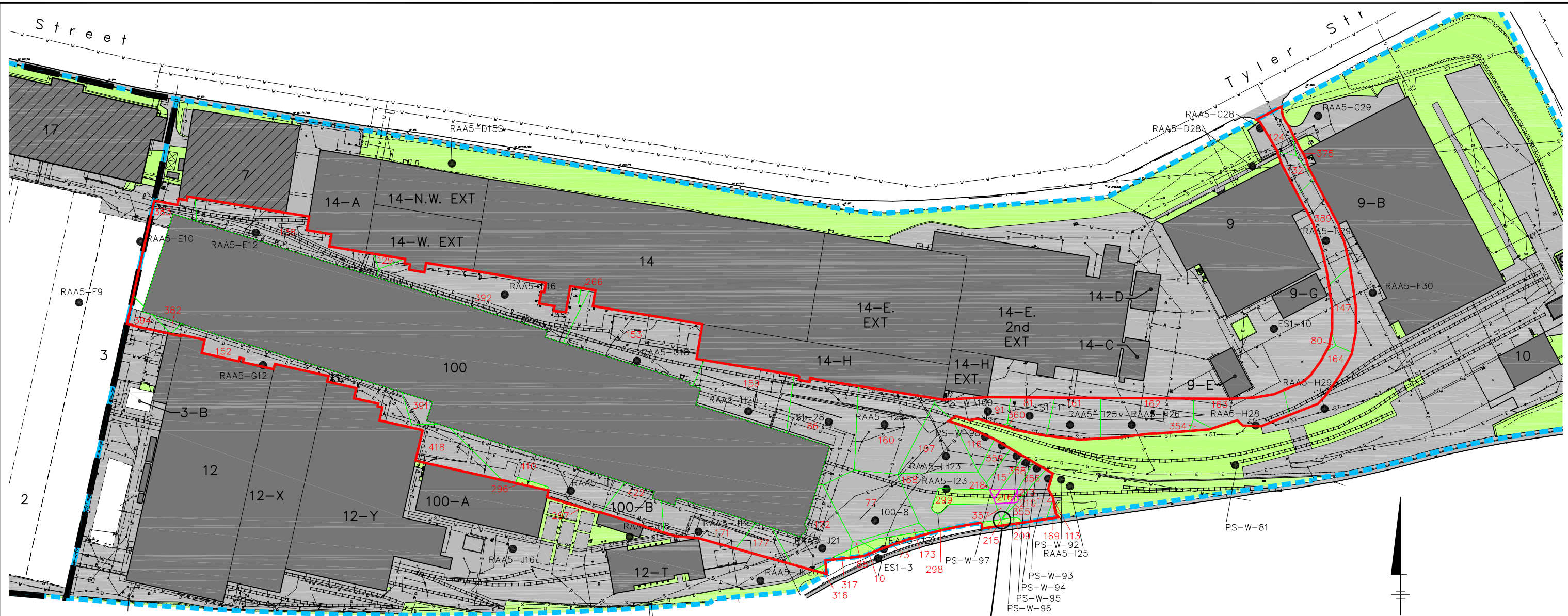


GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
**EAST STREET AREA 2-NORTH - BUILDING 100
 AVERAGING AREA**

**THEISSEN POLYGON MAP
 14- TO 15-FOOT DEPTH INTERVAL**

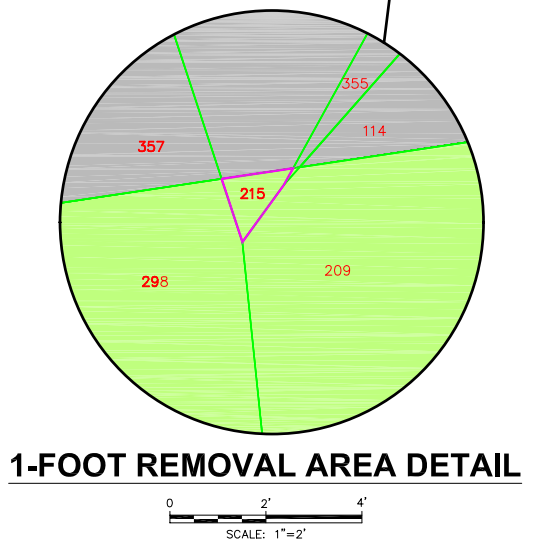
FIGURE
13

[SYR-85-DMW] SYR-85-DMW GNS LAF LAYER: ON=1, OFF=REF*, SPOLY=AREA
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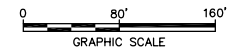


LEGEND

- | | | | |
|--|--|--|--|
| | REMOVAL ACTION AREA BOUNDARY | | STORM SEWER |
| | BUILDING | | SANITARY SEWER |
| | BUILDING TO BE DEMOLISHED | | WATER MAIN / FIRE PROTECTION MAIN |
| | FORMER BUILDING LOCATION | | STEAM LINE |
| | BUILDING ID | | NATURAL GAS MAIN |
| | PAVED AREA | | ELECTRIC/TELEPHONE CONDUIT |
| | UNPAVED AREA | | LIGHT POLE |
| | EXISTING SOIL SAMPLING LOCATION | | CATCH BASIN |
| | APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA) | | DRAIN MANHOLE |
| | PROPOSED BUILDING 100 AVERAGING AREA | | UTILITY POLE |
| | HORIZONTAL EXTENTS OF SOIL REMOVAL AT THIS DEPTH TO ADDRESS PCBs | | GAS VALVE |
| | | | FIRE HYDRANT |
| | | | WATER SHUTOFF |
| | | | HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH. |
| | | | POLYGON ID |



- NOTES:**
- BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
 - NOT ALL PHYSICAL FEATURES SHOWN.

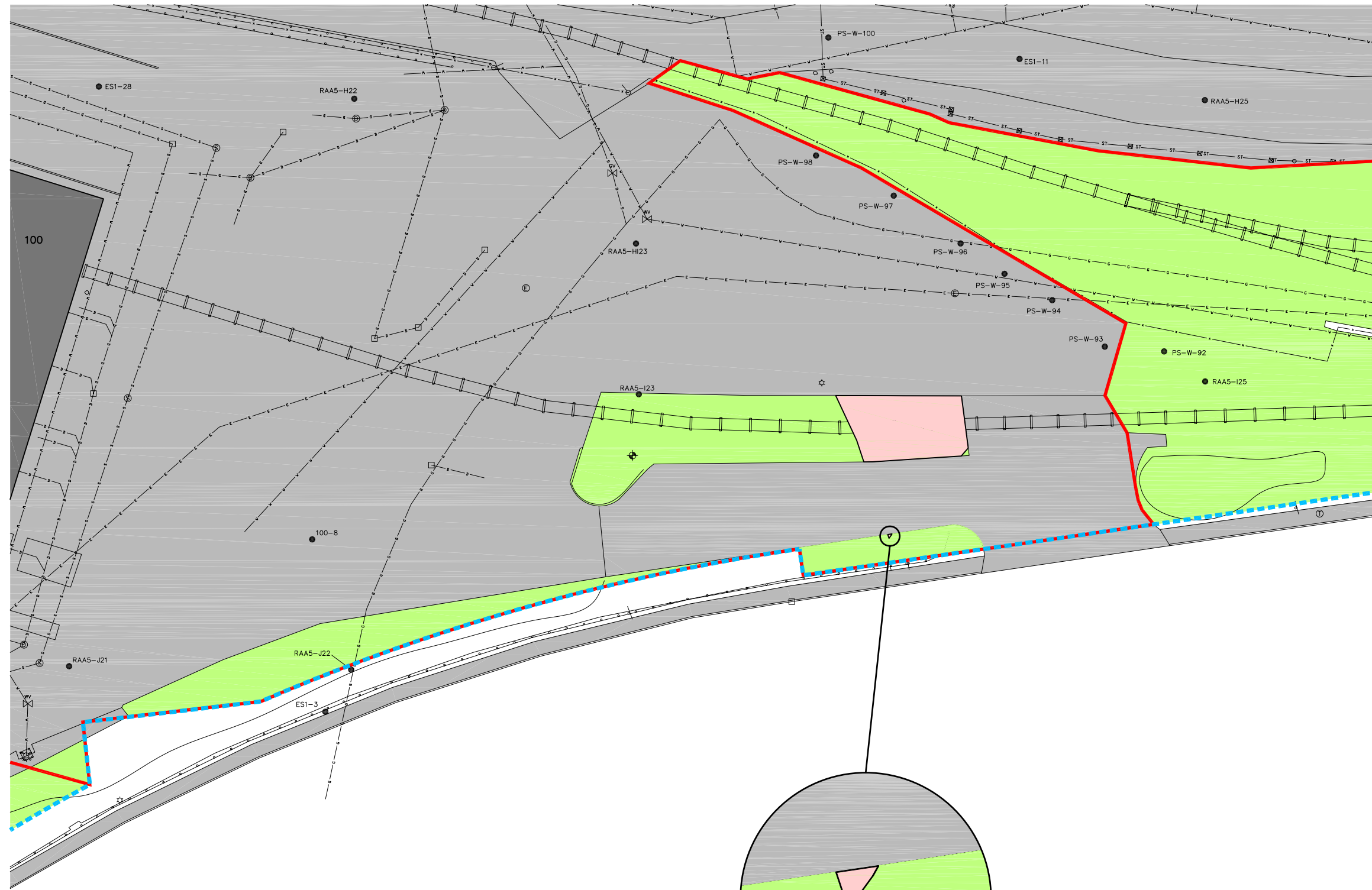


GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
EAST STREET AREA 2-NORTH - BUILDING 100
AVERAGING AREA
POST-REMEDIATION THEISSEN
POLYGON MAP
0- TO 1-FOOT DEPTH INTERVAL



[SYR-85-DMW] SYR-85-DMW NES_LAF_LAYER: ON=*, OFF=*REF*, SPOLY=AREA
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PROJECT NAME: IMAGES:
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 40469002
 40469000

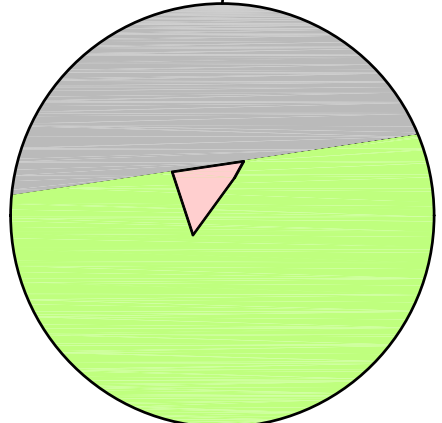


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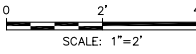
- REMOVAL ACTION AREA BOUNDARY
- BUILDING
- 14** BUILDING ID
- PAVED AREA
- UNPAVED AREA
- EXISTING SOIL SAMPLING LOCATION
- 1-FOOT REMOVAL
- PROPOSED BUILDING 100 AVERAGING AREA
- STORM SEWER
- SANITARY SEWER
- WATER MAIN / FIRE PROTECTION MAIN
- STEAM LINE
- NATURAL GAS MAIN
- ELECTRIC/TELEPHONE CONDUIT
- LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF

NOTES:

1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
2. NOT ALL PHYSICAL FEATURES SHOWN.



1-FOOT REMOVAL AREA DETAIL



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
**EAST STREET AREA 2-NORTH - BUILDING 100
 AVERAGING AREA**

**PRELIMINARY SOIL-RELATED
 RESPONSE ACTIONS**

ARCADIS BBL
infrastructure, environment, facilities

FIGURE
15

Attachment A

Risk Evaluation of Non-PCB
Appendix IX+3 Constituents

Attachment A
Risk Evaluation of Non-PCB Appendix IX+3 Constituents
Building 100 Averaging Area – East Street Area 2-North

General Electric Company
Pittsfield, Massachusetts

1.0 Introduction

A number of non-PCB constituents have been detected in the soils of the Building 100 Averaging Area in the East Street Area 2-North Removal Action Area (RAA) of the GE-Pittsfield/Housatonic River Site. These constituents have been evaluated in accordance with the multi-step process established for non-PCB Appendix IX+3 constituents in the Statement of Work for Removal Actions Outside the River (SOW) (BBL, 1999). These steps included screening by comparison of the maximum detected concentrations of the constituents to EPA's applicable Preliminary Remediation Goals (PRGs) for soil listed in an attachment to the SOW. Following this screening process, the average concentrations of the remaining constituents in each relevant depth increment were compared to the applicable Method 1 soil standards under the Massachusetts Contingency Plan (MCP).

In the soils of the Building 100 Averaging Area, there was an exceedance of the applicable Method 1 soil standard for one constituent at one depth increment. Thus, GE requested that ARCADIS BBL conduct an area-specific risk evaluation of the non-PCB constituents under existing conditions for this averaging area. The risk evaluation was performed for all non-PCB constituents that were retained prior to the comparison to the Method 1 soil standards (except for dioxins/furans, which were evaluated separately in accordance with the SOW).

This Appendix describes and presents the results of the risk evaluation the Building 100 Averaging Area, which is a commercial property. In accordance with the SOW, this risk evaluation was based on: (a) the arithmetic average concentrations of the retained non-PCB constituents at each soil depth; (b) the same exposure scenarios, soil depth increments, and exposure assumptions used by EPA in developing the PCB Performance Standards for commercial/industrial areas (as described in EPA, 1999); and (c) standard EPA toxicity values. As discussed below, for the constituents evaluated, estimated cancer risks and non-cancer hazards fall well below the acceptable benchmarks prescribed in the SOW.

2.0 Constituents and Depth Increments Evaluated

In accordance with the protocols set forth in the SOW, the risk evaluation presented herein has considered all chemicals of potential concern (COPCs) that were retained for evaluation after the initial screening steps described in this Work Plan but before the comparison to MCP Method 1 standards, and have used the average concentrations of those constituents at each soil depth. The constituents evaluated are arsenic, benzo(a)pyrene, and methylene chloride.

For each COPC, the average concentrations within the averaging area have been calculated for the same depth increments evaluated by EPA (1999) in developing the PCB Performance Standards. For commercial/industrial properties with a Grant of Environmental Restrictions and Easements (ERE), these increments are the 0-1 foot and the 1-6 foot depth increments. Based on discussions with EPA, the 0-15 foot depth increment has also been evaluated, as described below.

The area-specific COPCs were included in risk calculations to determine whether cancer risks and non-cancer hazards fall within acceptable limits. (In accordance with the SOW, PCBs and dioxins/furans have not been included in this evaluation.)

3.0 Risk Evaluation Assumptions and Procedures

In accordance with the SOW, the exposure scenarios that have been evaluated are the same exposure scenarios utilized by EPA (1999) in supporting the PCB Performance Standards. For commercial/industrial areas, these are the Commercial Groundskeeper scenario for the 0-1 foot depth increment, and the Utility worker scenario for the 1-6 foot depth increment. Based on discussions with EPA, the Utility Worker scenario has also been used to evaluate the 0-15 foot depth increment.

The Commercial Groundskeeper scenario assumes that an adult is exposed to constituents in surficial soils 84 days per year for a period of 25 years. With the exception of chemical-specific absorption criteria, all exposure assumptions used to evaluate this scenario were the same as those used by EPA (1999). Exposure assumptions used in the evaluation of this scenario are provided in Table 1.

The Utility Worker scenario assumes that an adult is in contact with subsurface soils 5 days per year for 25 years. As with the Groundskeeper scenario, all exposure assumptions used in this scenario were the same as the assumptions used by EPA (1999). These assumptions are also presented in Table 1.

With respect to absorption factors, EPA's dermal guidance document (EPA, 2004) specifies oral absorption factors less than 100 percent for certain of the constituents evaluated (e.g., 89 percent for the carcinogenic polycyclic aromatic hydrocarbons [PAHs]), and notes that where such factors are greater than 50 percent, the toxicity factors do not need to be modified to represent the absorbed dose. Nevertheless, for purposes of the evaluating the soils in the Building 100 Averaging Area, ARCADIS BBL has conservatively assumed that the oral absorption of all COPCs evaluated is 100 percent. The dermal absorption factors used were taken from EPA's dermal guidance (EPA, 2004). The specific absorption factors used in these evaluations are shown in Table 2.

The carcinogenic COPCs have been evaluated for potential carcinogenic risks, while the non-carcinogenic COPCs have been evaluated for potential non-cancer hazards. The toxicity values – i.e., Cancer Slope Factors (CSFs) and/or Reference Doses (RfDs) – used in the evaluations are those set forth on EPA's (2007) Integrated Risk Information System (IRIS), when available.

Based on these input values, predicted cancer risks and non-cancer hazards have been calculated for the COPCs using standard risk assessment procedures. The results have been compared to the benchmarks set forth in the SOW (for constituents other than PCBs and dioxins/furans) of an Excess Lifetime Cancer Risk (ELCR) of 1×10^{-5} (after rounding) and a Hazard Index (HI) of 1 for non-cancer effects.

4.0 Risk Evaluation

The risk evaluation was conducted for the Building 100 Averaging Area due to the fact that the applicable Method 1 soil standard was exceeded by one COPC at one sampling depth. The risk evaluation is based on existing soil conditions at the Building 100 Averaging Area. The specific COPCs and depth increments evaluated and the risk evaluation results are summarized below. Spreadsheets showing pathway-specific and COPC-specific risk calculations are provided in Appendix A of this Attachment.

The depth increments subject to risk evaluation for the Building 100 Averaging Area are the 0-1 foot, 1-6 foot and 0-15 foot depth increments. The COPCs evaluated and their average concentrations in each relevant depth increment are as follows.

COPC	Average Soil Concentration (mg/kg)		
	0-1 foot	1-6 foot	0-15 foot
Arsenic	6.05	7.1	6.5
Benzo(a)pyrene	0.18	0.4	0.3
Methylene chloride	0.31	29.7	12.8

The Groundskeeper scenario has been used to evaluate risks for the 0-1 foot depth increment and the Utility Worker scenario has been used to evaluate risks for the 1-6 and 0-15 foot depth increments. The calculated total cancer risks and non-cancer hazards for all COPCs evaluated at the Building 100 Averaging Area are as follows.

Scenario	ELCR	HI
Groundskeeper (0-1 foot)	7.8E-07	0.0040
Utility Worker (1-6 foot)	2.6E-07	0.0010
Utility Worker (0-15 foot)	2.2E-07	0.00092

The estimated risks and hazards for all three depth increments evaluated are well below the MCP benchmarks of an ELCR of 1×10^{-5} and a non-cancer HI of 1.

5.0 Summary of Area-Specific Risk Evaluation Results

The predicted cancer risks and non-cancer hazards for the non-PCB COPCs at the Building 100 Averaging Area are summarized in Tables 3 and 4, respectively. These tables show the cancer risk and non-cancer hazard results for each exposure pathway and depth increment evaluated for this area. Backup COPC-specific calculations are provided in Appendix A. As shown in Tables 3 and 4, total estimated cancer risks do not exceed the identified cancer risk benchmark of 1×10^{-5} for any depth increment at this property and the non-cancer hazards resulting from exposures to surficial and subsurface soils do not exceed the target Hazard Index of 1. For these reasons, it can be concluded that, under existing conditions, the soil concentrations for all such COPCs soils in the Building 100 Averaging Area would not present a risk of harm under the exposure scenarios evaluated.

References

BBL. 1999. Statement of Work for Removal Actions Outside the River. Appendix E to Consent Decree, Volume 1, United States et al. v. General Electric Company (D. Mass.). Blasland, Bouck & Lee, Syracuse, NY. October.

EPA. 1999. Protectiveness of Cleanup Levels for Removal Actions Outside the River – Protection of Human Health. Memorandum from Ann-Marie Burke, EPA Region 1 to Richard Cavagnero, EPA Region 1. U.S. Environmental Protection Agency, Region I. Attachment A to Appendix D to Consent Decree in United States et al. v. General Electric Company (D. Mass.). August 4.

EPA. 2004. Risk Assessment Guidance for Superfund, Volume I: Human Health Evaluation Manual (Part E, Supplemental Guidance for Dermal risk Assessment) Final. U.S. Environmental Protection Agency, Office of Superfund Remediation and Technology Innovation. Washington. EPA/540/R/99/005; OSWER 9285.7-02EP. July.

EPA. 2007. U.S. EPA Integrated Risk Information System (IRIS). <http://www.epa.gov/iriswebp/iris/index.html>

Tables

Table 1
Summary of Exposure Parameters for the Groundskeeper and Utility Worker Scenarios

Building 100 Averaging Area - East Street Area 2-North
General Electric Company - Pittsfield, Massachusetts

Parameter	Values		Basis
	Groundskeeper	Utility Worker	
Soil Ingestion Rate	50 mg/day	137 mg/day	EPA, 1999
Fraction from the Site	1.0	1.0	EPA, 1999
Dermal Adherence Factor	0.1 mg/cm ²	0.8 mg/cm ²	EPA, 1999
Skin Surface Area Exposed	3300 cm ²	3300 cm ²	EPA, 1999
Exposure Frequency	84 days/year	5 days/year	EPA, 1999
Exposure Duration	25 years	25 years	EPA, 1999
Body Weight	70 kg	70 kg	EPA, 1999
Carcinogenic Averaging Time	25,550 days	25,550 days	EPA, 1999
Non-Carcinogenic Averaging Time	9125 days	9125 days	EPA, 1999

Table 2
Summary of Chemical-Specific Absorption Factors and Toxicity Values

Building 100 Averaging Area - East Street Area 2-North
General Electric Company - Pittsfield, Massachusetts

Constituent	Oral Absorption Factor ¹	Relative Dermal Absorption Factor ²	Cancer Slope Factor (mg/kg-day)⁻¹	Reference Dose (mg/kg-day)
Arsenic	1	0.03	1.5 ³	0.0003 ³
Benzo(a)pyrene	1	0.13	7.3 ³	-
Methylene chloride	1	0	0.0075 ³	0.06 ³

Notes:

1. Conservative default
2. EPA (2004) Dermal Guidance Document
3. IRIS (EPA, 2007)

Table 3

Summary of Potential Cancer Risks Associated with Soils of the Building 100 Averaging Area

Building 100 Averaging Area - East Street Area 2-North

General Electric Company - Pittsfield, Massachusetts

Location	Exposure Pathway	Cancer Risk		
		0- to 1-foot	1- to 6-foot	0- to 15-foot
Building 100 Averaging Area Commercial	Soil Ingestion	6.1E-07	1.3E-07	1.2E-07
	Dermal Exposure	1.7E-07	1.3E-07	1.1E-07
	Total	7.8E-07	2.6E-07	2.2E-07

Table 4

Summary of Potential Hazard Indices Associated with Soils of the Building 100 Averaging Area

Building 100 Averaging Area - East Street Area 2-North

General Electric Company - Pittsfield, Massachusetts

Location	Exposure Pathway	Hazard Index		
		0- to 1-foot	1- to 6-foot	0- to 15-foot
Building 100 Averaging Area Commercial	Soil Ingestion	0.0033	0.00065	0.00059
	Dermal Exposure	0.00066	0.00037	0.00034
	Total	0.0040	0.0010	0.00092

Appendix A

Risk Calculations for the COPCs in
Soils in the Building 100 Averaging
Area

Table A1a - Cancer and Non-Cancer Risks from Ingestion Exposure to 0- to 1-Foot Soil in Building 100 Averaging Area

Pathway: Incidental Soil Ingestion

Receptor: Groundskeeper

Building 100 Averaging Area - East Street Area 2-North

General Electric Company - Pittsfield, Massachusetts

CARCINOGENIC

Risk = CDI x CSF

CDI = Cs x IgR x OA x EF x ED x CF x 1/BW x 1/ATc

Chemical	Cs	IgR	OA	EF	ED	CF	BW	ATc	CDI	CSF	Risk
	Soil Concentration (mg/kg)	Ingestion Rate (mg/d)	Oral Absorption (unitless)	Exposure Frequency (d/yr)	Exposure Duration (yrs)	Conversion Factor (kg/mg)	Body Weight (kg)	Averaging Time Carcinogenic (days)	Chronic Daily Intake (mg/kg-d)	Cancer Slope Factor (mg/kg-d) ⁻¹	
	Arsenic	6.05	50	1.0	84	25	1E-06	70	25,550	3.6E-07	1.5
Benzo(a)pyrene	0.18	50	1.0	84	25	1E-06	70	25,550	1.1E-08	7.3	7.7E-08
Methylene chloride	0.31	50	1.0	84	25	1E-06	70	25,550	1.8E-08	0.0075	1.4E-10
										Total	6.1E-07

NONCARCINOGENIC

HQ = CDI/RfD

CDI = Cs x IgR x OA x EF x ED x CF x 1/BW x 1/ATnc

Chemical	Cs	IgR	OA	EF	ED	CF	BW	ATnc	CDI	RfD	HQ
	Soil Concentration (mg/kg)	Ingestion Rate (mg/d)	Oral Absorption (unitless)	Exposure Frequency (d/yr)	Exposure Duration (yrs)	Conversion Factor (kg/mg)	Body Weight (kg)	Averaging Time Noncarcinogenic (days)	Chronic Daily Intake (mg/kg-d)	Reference Dose (mg/kg-d)	Hazard Quotient
	Arsenic	6.05	50	1.0	84	25	1E-06	70	9,125	9.9E-07	0.0003
Methylene chloride	0.31	50	1.0	84	25	1E-06	70	9,125	5.1E-08	0.06	8.5E-07
										Total	3.3E-03

Table A1b - Cancer and Non-Cancer Risks from Dermal Exposure to 0- to 1-Foot Soil in the Building 100 Averaging Area

Pathway: Dermal Contact

Receptor: Groundskeeper

Building 100 Averaging Area - East Street Area 2-North

General Electric Company - Pittsfield, Massachusetts

CARCINOGENIC

Risk = CDI x CSF

CDI = Cs x DAF x SA x DA x EF x ED x CF x 1/BW x 1/ATc

Chemical	Cs	DAF	SA	DA	EF	ED	CF	BW	ATc	CDI	CSF	Risk
	Soil Concentration (mg/kg)	Dermal Adherence Factor (mg/cm ²)	Surface Area Exposed (cm ² /day)	Dermal Absorption (unitless)	Exposure Frequency (d/yr)	Exposure Duration (yrs)	Conversion Factor (kg/mg)	Body Weight (kg)	Averaging Time Carcinogenic (days)	Chronic Daily Intake (mg/kg-d)	Cancer Slope Factor (mg/kg-d) ⁻¹	
Arsenic	6.05	0.1	3,300	0.03	84	25	1E-06	70	25,550	7.0E-08	1.5	1.1E-07
Benzo(a)pyrene	0.18	0.1	3,300	0.13	84	25	1E-06	70	25,550	9.1E-09	7.3	6.6E-08
Methylene chloride	0.31	0.1	3,300	0	84	25	1E-06	70	25,550	0.0E+00	0.0075	0.0E+00
Total												1.7E-07

NONCARCINOGENIC

HQ = CDI/RfD

CDI = Cs x DAF x SA x DA x EF x ED x CF x 1/BW x 1/ATnc

Chemical	Cs	DAF	SA	DA	EF	ED	CF	BW	ATnc	CDI	RfD	HQ
	Soil Concentration (mg/kg)	Dermal Adherence Factor (mg/cm ²)	Surface Area Exposed (cm ² /day)	Dermal Absorption (unitless)	Exposure Frequency (d/yr)	Exposure Duration (yrs)	Conversion Factor (kg/mg)	Body Weight (kg)	Averaging Time Noncarcinogenic (days)	Chronic Daily Intake (mg/kg-d)	Reference Dose (mg/kg-d)	Hazard Quotient
Arsenic	6.05	0.1	3,300	0.03	84	25	1E-06	70	9,125	2.0E-07	0.0003	6.6E-04
Methylene chloride	0.31	0.1	3,300	0	84	25	1E-06	70	9,125	0.0E+00	0.06	0.0E+00
Total												6.6E-04

Total Carcinogenic Risk		Ingestion	Dermal	Total
Arsenic		5.3E-07	1.1E-07	6.4E-07
Benzo(a)pyrene		7.7E-08	6.6E-08	1.4E-07
Methylene chloride		1.4E-10	0.0E+00	1.4E-10
Total		6.1E-07	1.7E-07	7.8E-07
Total Noncarcinogenic Hazard		Ingestion	Dermal	Total
Arsenic		3.3E-03	6.6E-04	4.0E-03
Methylene chloride		8.5E-07	0.0E+00	8.5E-07
Total		0.0033	0.00066	0.0040

Table A2a - Cancer and Non-Cancer Risks from Ingestion Exposure to 1- to 6-Foot Soil in Building 100 Averaging Area

Pathway: Incidental Soil Ingestion

Receptor: Utility Worker

Building 100 Averaging Area - East Street Area 2-North

General Electric Company - Pittsfield, Massachusetts

CARCINOGENIC

Risk = CDI x CSF

CDI = Cs x IgR x OA x EF x ED x CF x 1/BW x 1/ATc

Chemical	Cs Soil Concentration (mg/kg)	IgR Ingestion Rate (mg/d)	OA Oral Absorption (unitless)	EF Exposure Frequency (d/yr)	ED Exposure Duration (yrs)	CF Conversion Factor (kg/mg)	BW Body Weight (kg)	ATc Averaging Time Carcinogenic (days)	CDI Chronic Daily Intake (mg/kg-d)	CSF Cancer Slope Factor (mg/kg-d) ⁻¹	Risk
Arsenic	7.1	137	1.0	5	25	1E-06	70	25,550	6.8E-08	1.5	1.0E-07
Benzo(a)pyrene	0.4	137	1.0	5	25	1E-06	70	25,550	3.8E-09	7.3	2.8E-08
Methylene chloride	29.7	137	1.0	5	25	1E-06	70	25,550	2.8E-07	0.0075	2.1E-09
										Total	1.3E-07

NONCARCINOGENIC

HQ = CDI/RfD

CDI = Cs x DAF x SA x DA x EF x ED x CF x 1/BW x 1/ATnc

Chemical	Cs Soil Concentration (mg/kg)	IgR Ingestion Rate (mg/d)	OA Oral Absorption (unitless)	EF Exposure Frequency (d/yr)	ED Exposure Duration (yrs)	CF Conversion Factor (kg/mg)	BW Body Weight (kg)	ATnc Averaging Time Noncarcinogenic (days)	CDI Chronic Daily Intake (mg/kg-d)	RfD Reference Dose (mg/kg-d)	HQ Hazard Quotient
Arsenic	7.1	137	1.0	5	25	1E-06	70	9,125	1.9E-07	0.0003	6.3E-04
Methylene chloride	29.7	137	1.0	5	25	1E-06	70	9,125	8.0E-07	0.06	1.3E-05
										Total	6.5E-04

Table A2b - Cancer and Non-Cancer Risks from Dermal Exposure to 1- to 6-Foot Soil in the Building 100 Averaging Area

Pathway: Dermal Contact

Receptor: Utility Worker

Building 100 Averaging Area - East Street Area 2-North

General Electric Company - Pittsfield, Massachusetts

CARCINOGENIC

Risk = CDI x CSF

CDI = Cs x DAF x SA x DA x EF x ED x CF x 1/BW x 1/ATc

Chemical	Cs	DAF Dermal	SA	DA	EF	ED	CF	BW	ATc	CDI	CSF	Risk
	Soil Concentration (mg/kg)	Adherence Factor (mg/cm ²)	Surface Area Exposed (cm ² /day)	Dermal Absorption (unitless)	Exposure Frequency (d/yr)	Exposure Duration (yrs)	Conversion Factor (kg/mg)	Body Weight (kg)	Averaging Time Carcinogenic (days)	Chronic Daily Intake (mg/kg-d)	Cancer Slope Factor (mg/kg-d) ⁻¹	
Arsenic	7.1	0.8	3,300	0.03	5	25	1E-06	70	25,550	3.9E-08	1.5	5.9E-08
Benzo(a)pyrene	0.4	0.8	3,300	0.13	5	25	1E-06	70	25,550	9.6E-09	7.3	7.0E-08
Methylene chloride	29.7	0.8	3,300	0	5	25	1E-06	70	25,550	0.0E+00	0.0075	0.0E+00
											Total	1.3E-07

NONCARCINOGENIC

HQ = CDI/RfD

CDI = Cs x DAF x SA x DA x EF x ED x CF x 1/BW x 1/ATnc

Chemical	Cs	DAF Dermal	SA	DA	EF	ED	CF	BW	ATnc	CDI	RfD	HQ
	Soil Concentration (mg/kg)	Adherence Factor (mg/cm ²)	Surface Area Exposed (cm ² /day)	Dermal Absorption (unitless)	Exposure Frequency (d/yr)	Exposure Duration (yrs)	Conversion Factor (kg/mg)	Body Weight (kg)	Averaging Time Noncarcinogenic (days)	Chronic Daily Intake (mg/kg-d)	Reference Dose (mg/kg-d)	Hazard Quotient
Arsenic	7.1	0.8	3,300	0.03	5	25	1E-06	70	9,125	1.1E-07	0.0003	3.7E-04
Methylene chloride	29.7	0.8	3,300	0	5	25	1E-06	70	9,125	0.0E+00	0.06	0.0E+00
											Total	3.7E-04

Total Carcinogenic Risk		Ingestion	Dermal	Total
Arsenic		1.0E-07	5.9E-08	1.6E-07
Benzo(a)pyrene		2.8E-08	7.0E-08	9.8E-08
Methylene chloride		2.1E-09	0.0E+00	2.1E-09
	Total	1.3E-07	1.3E-07	2.6E-07
Total Noncarcinogenic Hazard		Ingestion	Dermal	Total
Arsenic		6.3E-04	3.7E-04	1.0E-03
Methylene chloride		1.3E-05	0.0E+00	1.3E-05
	Total	0.00065	0.00037	0.0010

Table A3a - Cancer and Non-Cancer Risks from Ingestion Exposure to 0- to 15-Foot Soil in Building 100 Averaging Area

Pathway: Incidental Soil Ingestion

Receptor: Utility Worker

Building 100 Averaging Area - East Street Area 2-North

General Electric Company - Pittsfield, Massachusetts

CARCINOGENIC

Risk = CDI x CSF

CDI = Cs x IgR x OA x EF x ED x CF x 1/BW x 1/ATc

Chemical	Cs	IgR	OA	EF	ED	CF	BW	ATc	CDI	CSF	Risk
	Soil Concentration (mg/kg)	Ingestion Rate (mg/d)	Oral Absorption (unitless)	Exposure Frequency (d/yr)	Exposure Duration (yrs)	Conversion Factor (kg/mg)	Body Weight (kg)	Averaging Time Carcinogenic (days)	Chronic Daily Intake (mg/kg-d)	Cancer Slope Factor (mg/kg-d) ⁻¹	
Arsenic	6.5	137	1.0	5	25	1E-06	70	25,550	6.2E-08	1.5	9.3E-08
Benzo(a)pyrene	0.3	137	1.0	5	25	1E-06	70	25,550	2.9E-09	7.3	2.1E-08
Methylene chloride	12.8	137	1.0	5	25	1E-06	70	25,550	1.2E-07	0.0075	9.2E-10
										Total	1.2E-07

NONCARCINOGENIC

HQ = CDI/RfD

CDI = Cs x IgR x OA x EF x ED x CF x 1/BW x 1/ATnc

Chemical	Cs	IgR	OA	EF	ED	CF	BW	ATnc	CDI	RfD	HQ
	Soil Concentration (mg/kg)	Ingestion Rate (mg/d)	Oral Absorption (unitless)	Exposure Frequency (d/yr)	Exposure Duration (yrs)	Conversion Factor (kg/mg)	Body Weight (kg)	Averaging Time Noncarcinogenic (days)	Chronic Daily Intake (mg/kg-d)	Reference Dose (mg/kg-d)	Hazard Quotient
Arsenic	6.5	137	1.0	5	25	1E-06	70	9,125	1.7E-07	0.0003	5.8E-04
Methylene chloride	12.8	137	1.0	5	25	1E-06	70	9,125	3.4E-07	0.06	5.7E-06
										Total	5.9E-04

Table A3b - Cancer and Non-Cancer Risks from Dermal Exposure to 0- to 15-Foot Soil in the Building 100 Averaging Area

Pathway: Dermal Contact

Receptor: Utility Worker

Building 100 Averaging Area - East Street Area 2-North

General Electric Company - Pittsfield, Massachusetts

CARCINOGENIC

Risk = CDI x CSF

CDI = Cs x DAF x SA x DA x EF x ED x CF x 1/BW x 1/ATc

Chemical	Cs Soil Concentration (mg/kg)	DAF Dermal Adherence Factor (mg/cm ²)	SA Surface Area Exposed (cm ² /day)	DA Dermal Absorption (unitless)	EF Exposure Frequency (d/yr)	ED Exposure Duration (yrs)	CF Conversion Factor (kg/mg)	BW Body Weight (kg)	ATc Averaging Time Carcinogenic (days)	CDI Chronic Daily Intake (mg/kg-d)	CSF Cancer Slope Factor (mg/kg-d) ⁻¹	Risk
Arsenic	6.5	0.8	3,300	0.03	5	25	1E-06	70	25,550	3.6E-08	1.5	5.4E-08
Benzo(a)pyrene	0.3	0.8	3,300	0.13	5	25	1E-06	70	25,550	7.2E-09	7.3	5.3E-08
Methylene chloride	12.8	0.8	3,300	0	5	25	1E-06	70	25,550	0.0E+00	0.0075	0.0E+00
											Total	1.1E-07

NONCARCINOGENIC

HQ = CDI/RfD

CDI = Cs x DAF x SA x DA x EF x ED x CF x 1/BW x 1/ATnc

Chemical	Cs Soil Concentration (mg/kg)	DAF Dermal Adherence Factor (mg/cm ²)	SA Surface Area Exposed (cm ² /day)	DA Dermal Absorption (unitless)	EF Exposure Frequency (d/yr)	ED Exposure Duration (yrs)	CF Conversion Factor (kg/mg)	BW Body Weight (kg)	ATnc Averaging Time Noncarcinogenic (days)	CDI Chronic Daily Intake (mg/kg-d)	RfD Reference Dose (mg/kg-d)	HQ Hazard Quotient
Arsenic	6.5	0.8	3,300	0.03	5	25	1E-06	70	9,125	1.0E-07	0.0003	3.4E-04
Methylene chloride	12.8	0.8	3,300	0	5	25	1E-06	70	9,125	0.0E+00	0.06	0.0E+00
											Total	3.4E-04

Total Carcinogenic Risk			
	Ingestion	Dermal	Total
Arsenic	9.3E-08	5.4E-08	1.5E-07
Benzo(a)pyrene	2.1E-08	5.3E-08	7.4E-08
Methylene chloride	9.2E-10	0.0E+00	9.2E-10
Total	1.2E-07	1.1E-07	2.2E-07
Total Noncarcinogenic Hazard			
	Ingestion	Dermal	Total
Arsenic	5.8E-04	3.4E-04	9.2E-04
Methylene chloride	5.7E-06	0.0E+00	5.7E-06
Total	0.00059	0.00034	0.00092