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Mr. Dean Tagliaferro  
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**Re: GE-Pittsfield/Housatonic River Site  
East Street Area 2-North (GECD140)  
Building Materials Characterization and Demolition Activities for Buildings 11 and 16;  
Revised Plan for Disposition of Crushed Building Materials from Buildings 7, 17, 17C, and 19  
and Buildings 11 and 16**

Dear Messrs. Cavagnero and Tagliaferro:

The General Electric Company (GE) has prepared this letter to address several topics related to the demolition of buildings within East Street Area 2-North at GE's Pittsfield, Massachusetts facility and the use of demolition materials from those buildings. As you know, GE intends to transfer ownership of the western portion of East Street Area 2-North, known as the 19s Complex, to the Pittsfield Economic Development Authority (PEDA) under an agreement with PEDA. Before it would transfer that property, GE will complete the demolition of the remaining buildings within the 19s Complex (namely, Buildings 11, 16, 17, 17C, and 19), as well as one building (Building 7) in East Street Area 2-North adjacent to that Complex. As you also know, GE and PEDA would like to be able to use certain crushed brick and concrete materials from those buildings for backfill and grading purposes at their properties. GE has previously submitted to the U.S. Environmental Protection Agency (EPA) a description of GE's plans for demolishing Buildings 7, 17, 17C, and 19, the building material characterization data from those buildings, and a plan for segregation and disposition of the materials from those buildings (including on-site use of some of those materials). GE's initial proposal on this subject was submitted on June 29, 2006, and after EPA disapproved that plan in part, GE submitted a revised plan on May 30, 2007.

The present letter describes GE's plans for demolishing Buildings 11 and 16 (shown on Figure 1). As building demolition activities themselves are not part of the Removal Actions under the Consent Decree (CD) and the accompanying *Statement of Work for Removal Actions Outside the River* (SOW), this letter presents a general description of GE's anticipated demolition activities for these buildings for informational purposes. In addition, in support of GE's proposed plans for the disposition of the building demolition materials, this letter presents the results of building material characterization activities performed by GE at Buildings 11 and 16, the evaluations that have been performed to assess potential disposition options for those materials, and GE's proposed plans for segregating those materials.

Further, based on discussions and communications among GE, EPA, and PEDDA subsequent to GE's submittal of its May 30, 2007 plan for post-demolition disposition activities at Buildings 7, 17, 17C, and 19, GE has, in coordination with PEDDA, developed a revised approach for the on-site use of certain materials from those buildings, along with a similar proposed approach for the on-site use of certain materials from Buildings 11 and 16 (which GE plans to demolish at the same time). Accordingly, this letter proposes, for EPA's review and approval, a proposed collective approach for the processing and disposition of materials from Buildings 7, 11, 16, 17, 17C, and 19. As such, this letter constitutes a modification of the plan contained in GE's May 30, 2007 letter. GE also proposes that, following EPA's approval of this approach, a single CD modification be prepared to allow the on-site use of the specified demolition materials from all these buildings.

Part A of this letter presents the following for Buildings 11 and 16:

- summary of building material characterization activities and data;
- evaluation of the available building material characterization data to determine potential disposition options;
- general description of the anticipated demolition activities; and
- proposed building demolition material segregation activities.

Part B of this letter presents GE's proposed revised approach for the processing and disposition of demolition materials from Buildings 7, 11, 16, 17, 17C, and 19. In addition, Part B of this letter includes a discussion regarding the processing of materials destined for placement at the Hill 78 On-Plant Consolidation Area (OPCA), as well as the composition of those materials, to show that the on-site use of demolition materials from these buildings will not adversely impact future consolidation and final capping/closure activities at the Hill 78 OPCA.

## **A. MATERIAL CHARACTERIZATION, DEMOLITION, AND MATERIAL SEGREGATION FOR BUILDINGS 11 AND 16**

### **1. Building Material Characterization Activities and Data**

The characterization requirements for buildings subject to demolition are set forth in GE's *Protocols for Building Demolition and Associated Characterization Activities* (Demolition Protocols), the most recent version of which was submitted to EPA on March 30, 2007 as Exhibit A-1 to Attachment A to GE's *Project Operations Plan* (POP), which was approved by EPA on June 13, 2007. Under the Demolition Protocols, initial characterization sampling of building materials subject to demolition (with the exception of wood block flooring and structural steel) is to be performed using an area-based approach, requiring the collection of one sample for every 5,000 square feet of floor area for analysis of PCBs and one composite sample for every 50,000 square feet of floor area for Toxicity Characteristic Leaching Procedure (TCLP) analysis of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and inorganics. Application of this sampling frequency to Buildings 11 and 16 (including the exterior ramp located adjacent to Building 11), which total approximately 200,000 square feet, would require 40 PCB samples and 4 TCLP samples.

In addition, given the potential for the building material to be used as on-site backfill/grading material, GE also considered the requirements of the *Soil Cover and Backfill Characterization Plan* (Characterization Plan), included as Attachment B to the POP. As stated in that plan, samples of potential backfill and soil cover material are required at a frequency of one composite sample (composed of 10

discrete “grab” samples) per 2,000 cubic yards (cy) of material for analysis of PCBs and the VOCs, SVOCs, and inorganic compounds identified in Appendix IX of 40 CFR Part 264, plus three additional constituents (benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine) (Appendix IX+3). Based on an estimated volume of approximately 12,500 cy of material from Buildings 11 and 16, this would entail a total of 7 analyses for these materials. However, given the fact that these materials consist of building materials rather than soil, and to be consistent with the sampling approach previously used and accepted by EPA for the characterization of building materials in the 40s Complex, GE established a modified, area-based sampling approach for non-PCB constituents. That approach involved a sampling frequency of three discrete core samples per floor of each building for analysis of Appendix IX+3 VOCs, SVOCs, and inorganics. Application of this sampling frequency to Buildings 11 and 16 required nine samples from Building 11 (first floor, second floor, and third floor) and 12 samples from Building 16 (first floor, second floor, third floor, and fourth floor).

Based on these characterization requirements, GE developed a building characterization program to obtain PCB and non-PCB data for Buildings 11 and 16. GE performed these pre-demolition characterization activities at Building 16 on January 16-18, 2007, and at Building 11 on January 23-24, 2007. EPA personnel were present to observe the sampling activities.

The sampling program involved the collection of 68 samples. Of these, 43 discrete core samples of concrete or brick building materials were collected for PCB analysis; four composite samples of concrete/brick building materials were collected for TCLP analysis; and 21 discrete core samples of concrete and brick building materials were collected for analysis of Appendix IX+3 VOCs, SVOCs, and inorganics. The sampling locations are depicted on Figures 2 through 8. These sample locations were selected in the field based on the following considerations:

- Adequate distribution within Buildings 11 and 16 to gain spatial representation of the building materials (to the extent practical);
- Sample selection to include stained areas, areas that were painted, and/or other areas potentially impacted by previous building operations;
- Collection of samples from building materials considered potentially suitable for re-use as backfill material (i.e., brick and concrete);
- No collection of samples from the at-grade concrete floor slabs, since the floor slabs and subgrade foundations will remain in place following building demolition activities; and
- No collection of samples from wood and asphalt block flooring, as these materials will be removed and transported to an appropriate off-site disposal facility as part of pre-demolition removal activities.

At each sample location, GE collected a full-depth core sample of the material being tested. Sampling activities and analytical procedures were performed consistent with GE’s approved *Field Sampling Plan/Quality Assurance Project Plan* (FSP/QAPP).

The analytical results of these samples are presented in Table 1 (for PCBs), Table 2 (for TCLP), and Table 3 (for the Appendix IX+3 VOCs, SVOCs, and inorganics). The analytical data for the characterization samples were reviewed in accordance with the data validation protocols included in the

FSP/QAPP. The results of this review are summarized in Attachment 1 and confirm that the data are within acceptable data validation parameters.

## 2. Evaluation of PCB and Non-PCB Data to Assess Potential Disposition Options

To assess the potential for future use of the building demolition materials as backfill/grading materials, GE calculated arithmetic average concentrations of the PCB results. These calculations were performed in three stages – (1) considering all 43 PCB sample results, (2) after excluding the results showing PCBs at or above 50 ppm (2 sample results from the second floor of Building 11), and (3) after excluding additional PCB results so as to achieve an average PCB concentration less than the CD and Massachusetts Contingency Plan (MCP) Method 1 soil standard of 2 ppm for residential use. Calculation of arithmetic average concentrations to assess the potential for use of these building materials as backfill/grading material was considered an appropriate method to represent the PCB concentration of the material, because the sample locations are well distributed and it is anticipated that, after segregation of the material with elevated PCB concentrations, the various remaining building materials will be mixed and homogenized upon crushing/preparation for use as fill material.

The initial calculation using all 43 PCB characterization samples (including the 2 samples with PCB concentrations at or above 50 ppm) resulted in an arithmetic average concentration of approximately 9.10 ppm. Next, GE identified the portions of Building 11 corresponding to the 2 samples containing PCBs at or above 50 ppm (as shown on Figure 3), and therefore subject to segregation and transport to an appropriate off-site disposal facility in accordance with EPA requirements under the Toxic Substances Control Act (TSCA). After excluding these 2 samples, as well as a third (non-TSCA) sample within the same area subject to the segregation of the TSCA material, a second arithmetic average PCB concentration was calculated for the remaining 40 samples. The average of those remaining samples is 4.54 ppm, as shown in Table 4.

To further reduce the overall average PCB concentration of the crushable, non-TSCA building materials to below 2 ppm, GE identified certain portions of the perimeter walls of Building 11 (as shown on Figures 2 and 4) that will be segregated for consolidation at the Hill 78 OPCA. After the segregation of these portions of Building 11, the overall arithmetic average PCB concentration in the remaining crushable, non-TSCA building materials is 1.52 ppm, as shown in Table 5 and summarized in the following table:

Building	Average Concentration (ppm)	Maximum Concentration (ppm)
11	0.66	2.0
16	1.90	9.5
<b>Total (all data in Table 5)</b>	<b>1.52</b>	<b>9.5*</b>

\* The "not-to-exceed" PCB concentration for materials in the 0- to 1-foot depth increment at residential properties is 10 ppm.

None of the results for the samples collected for TCLP analysis exceeded the respective Resource Conservation and Recovery Act (RCRA) TCLP regulatory limits. Therefore, for the portions of the buildings that contain PCBs at concentrations less than 50 ppm, the building materials are not considered hazardous waste under RCRA and are suitable for consolidation at GE's Hill 78 OPCA.

To evaluate the Appendix IX+3 VOCs, SVOCs, and inorganics data, GE has generally applied the procedures described in Attachment F to the SOW (Protocols for the Evaluation of Non-PCB

Constituents in Soil). The first step in this evaluation was the performance of a screening step, in which the maximum concentrations of all detected constituents in the materials potentially subject to on-site re-use (i.e., excluding the sample results from locations 11-1-W2 and 11-1-W8, which are located within portions of building materials subject to disposition at the Hill 78 OPCA) were compared to the EPA Region 9 Preliminary Remediation Goals (PRGs) set forth in Exhibit F-1 to Attachment F of the SOW, using the PRGs for residential area soils. For certain constituents for which EPA Region 9 PRGs are not available (i.e., certain polycyclic aromatic hydrocarbons), surrogate PRGs identified in the SOW were used. Table 6 presents the results of this screening step. As shown in Table 6, the maximum concentrations of all constituents detected in the samples collected from these materials were below their respective PRGs, with the exception of bis(2-ethylhexyl)phthalate, arsenic, and chromium.

For those three retained constituents, GE compared the average concentration of each such constituent to its applicable Method 1 soil standard set forth in the MCP, using the Category S-1 soil standards. As shown in Table 7, the arithmetic average concentration of each of these retained constituents is below the applicable Method 1 S-1 soil standard.

In summary, the results of these evaluations indicate that the concentrations of PCBs and non-PCB constituents in the material subject to crushing and potential on-site use would not only meet the applicable Performance Standards under the CD for commercial areas such as this, but would also meet the applicable Performance Standards under the CD for residential areas, as well as the MCP Method 1 soil standards for unrestricted use.

### **3. Demolition of Buildings 11 and 16**

GE has recently completed pre-demolition activities at Buildings 11 and 16, including, among other activities, asbestos abatement, removal of wood block and asphalt block flooring, and equipment and liquids removal. With the completion of pre-demolition activities, the buildings are now ready for demolition. The demolition will be performed using conventional construction equipment and practices, with appropriate ambient air monitoring and dust control measures employed during the demolition activities. (GE identified the approximate locations of the PCB and particulate ambient air monitoring stations to be used during the concurrent demolition of Buildings 11 and 16 and Buildings 7, 17, 17C, and 19 in a March 28, 2007 letter to EPA.) At this time, it is anticipated that the existing concrete slab-on-grade floors of Buildings 11 and 16 will be left intact, and that backfill will be placed as needed to fill subsurface voids in and around the former building locations subject to demolition and also to create a level grade between the slabs and the surrounding surfaces. In addition, locations where backfill is used to fill subsurface voids will be patched with either asphalt or concrete to match the surrounding grade. Therefore, following building demolition and related restoration activities, the surface of the affected areas will consist of the existing concrete (as patched with concrete or potentially asphalt) or the existing asphalt pavement (as patched with asphalt).

### **4. Segregation of Building Demolition Materials**

As discussed in Section A.2 above, review of the building characterization data indicates that, following the segregation of certain building materials with elevated PCB concentrations, the remaining, crushable building materials from Buildings 11 and 16 would meet the applicable standards under the CD for residential areas. The building materials with elevated PCB concentrations will be segregated and transported either to the Hill 78 OPCA (for building materials with PCB concentrations less than 50 ppm)

or to an appropriate off-site disposal facility (for building materials with PCB concentrations greater than or equal to 50 ppm). To establish the segregation limits of such materials, the following steps were used:

- First, all sample locations that showed PCB concentrations greater than or equal to 50 ppm were identified. These locations are all in Building 11 and are highlighted, along with their corresponding PCB concentrations, in Table 1. The extent of the building surface areas associated with those samples was then identified. In this step, the extent/limits of the walls were utilized to delineate the limits of the material to be segregated as subject to TSCA. The approximate areas so delineated as TSCA material within Building 11 are depicted on Figure 3.
- Next, sample locations that showed PCB concentrations less than 50 ppm but were identified for segregation to reduce the overall arithmetic average PCB concentration to below 2 ppm were delineated. These locations are all in Building 11 and are identified, along with their corresponding PCB concentrations, in Table 4. The extent of the building surface areas associated with those samples was then identified. In this step, the next sample location or the extent/limits of the walls were utilized to delineate the limits of the material to be segregated. The approximate areas so delineated within Building 11 are depicted on Figures 2 and 4.

As noted above, the building materials from the TSCA areas identified on Figure 3 will be segregated for subsequent disposition at an off-site disposal facility. In addition, certain vertical structural steel columns that are coated with asbestos mastic, which cannot be accessed and removed prior to demolition, will be segregated as part of the demolition activities for appropriate off-site disposition.

With regard to the remaining non-TSCA building materials, the non-crushable materials (e.g., steel) and the additional areas identified on Figures 2 and 4 (which are primarily composed of brick and concrete walls) will be segregated, downsized, and transported to the Hill 78 OPCA for consolidation. For the remaining crushable materials (i.e., brick and concrete) with average PCB concentrations less than 2 ppm, GE proposes to crush these materials to 2-inch minus as part of the Buildings 11 and 16 demolition program and to use the crushed material for backfill and grading purposes on-site, as described in Part B below. Figure 9 further illustrates the above-described material segregation approach.

Finally, the concrete slab-on-grade floors that will remain following the demolition activities will be addressed consistent with GE's December 21, 2006 proposals to EPA regarding the remaining building slabs at Buildings 1, 2, 3, 3B, 15, 15A, 15B, and 15W and the 40s Complex, as approved by EPA.

#### **B. PROPOSED REVISED APPROACH FOR PROCESSING AND DISPOSITION OF DEMOLITION MATERIALS FROM BUILDINGS 7, 11, 16, 17, 17C, AND 19**

By letter dated March 12, 2007, EPA provided partial conditional approval and partial disapproval of GE's June 28, 2006 proposal regarding the disposition of demolition materials from Buildings 7, 17, 17C, and 19. In response, GE submitted a letter to EPA on May 30, 2007, presenting a revised plan for post-demolition disposition activities relating to those buildings. In accordance with EPA's March 12, 2007 letter, GE's May 30, 2007 submittal included a definitive plan and timeframe for the placement of certain crushed materials generated from the demolition of Buildings 7, 17, 17C, and 19 within certain specified areas at the 19s Complex (which is intended to be transferred to PEDDA). In that letter, GE indicated that PEDDA had reviewed the plan and advised GE that it was in agreement with it.

However, subsequent to that submission, a series of communications have occurred among EPA, PEDA, and GE pertaining to the location and timing for placement of these materials. Specifically, EPA issued a letter to PEDA dated June 26, 2007, requesting PEDA's concurrence with accepting the materials. PEDA responded to EPA in a letter dated July 9, 2007, stating that PEDA will accept the materials provided that certain conditions are deemed acceptable by EPA, the Massachusetts Department of Environmental Protection (MDEP), and GE. Specifically, PEDA's letter included the following three conditions:

- a) *PEDA must be able to re-use the building debris on any parcel owned by PEDA within the designated 52-acre William Stanley Business Park of the Berkshires.*
- b) *PEDA must be able to re-use the building debris without any additional testing or re-testing.*
- c) *If PEDA determines that it cannot use some or all of the building debris (i.e. it does not meet the performance standards or PEDA does not have a use for the material), then GE shall be responsible for and bear the cost of removing and properly disposing of the material.*

In consideration of these requests, GE, in cooperation with PEDA, has developed a revised approach for the on-site use of demolition materials from Buildings 7, 17, 17C, and 19, in combination with a proposed similar approach for the on-site use of demolition materials from Buildings 11 and 16. This approach involves the following basic elements for the on-site use of demolition materials from Buildings 7, 11, 16, 17, 17C, and 19:

- 1) The materials to be used on-site for backfill or grading purposes will be limited to crushed brick and concrete materials that have been shown by prior sampling to have concentrations of PCBs and other Appendix IX+3 constituents that would meet the CD Performance Standards, as well as the MCP Method 1 standards, for unrestricted (e.g., residential) use.
- 2) These materials will be segregated, crushed, and placed as part of the demolition program (rather than creating temporary stockpiles for later crushing and placement).
- 3) Following crushing, these materials will be placed, for backfill or grading purposes, in selected locations within the 19s Complex (or adjacent to the 19s Complex in the former Building 7 area) as described below, or at other locations at the PEDA Properties (i.e., properties transferred or intended to be transferred to PEDA, defined herein as the 19s, 20s, 30s, and 40s Complexes) designated by PEDA, subject to EPA approval. However, as requested by PEDA, if PEDA should wish to re-use some or all of such materials elsewhere at the PEDA Properties for backfill or grading purposes, it may do so without any additional sampling, subject to EPA approval. Further, if PEDA should determine that it cannot use some or all of the crushed building materials and/or wishes such materials to be removed from the PEDA Properties, GE may, upon specific application to and approval by EPA, utilize those materials for an alternate use at the GE Plant Area (as described further below).

GE's May 30, 2007 letter already presented information demonstrating that the materials from Buildings 7, 17, 17C, and 19 proposed for on-site use would meet the first two criteria described above, and Part A of this letter shows that the materials from Buildings 11 and 16 proposed for on-site use would meet those two criteria. The third above-listed element is discussed further below.

As illustrated on Figure 9, the total estimated volume of demolition materials from Buildings 7, 11, 16, 17, 17C, and 19 that is subject either to on-site use or to consolidation at the Hill 78 OPCA is up to approximately 40,000 cy. This estimate is primarily based on visual field observations as well as the relationship between the total floor area of previously demolished buildings and the actual volume of material from those buildings (as determined by truck counts and in place survey measurements) consolidated at the OPCAs. Of the estimated 40,000 cy, it is estimated that 80% (or approximately 32,500 cy) consists of brick and concrete, and that the remaining 20% (or approximately 7,500 cy) consists of structural steel and other non-crushable materials.

Given that the remaining capacity at the Hill 78 OPCA is approximately 17,500 cy, it is intended that 7,500 cy of structural steel and other non-crushable materials will be consolidated there along with approximately 10,000 cy of brick and concrete materials. The 10,000 cy of brick and concrete materials will consist of those materials with average PCB concentrations greater than or equal to 2 ppm but less than 50 ppm, as well as a supplemental volume of brick and concrete materials with average PCB concentrations below 2 ppm as necessary to fill the remaining available air space at the Hill 78 OPCA. Note that these estimated volumes are approximate, and there may be variation in the actual ratio of brick and concrete to steel materials generated; nonetheless, it is GE's intention to provide for a relatively even distribution of brick, concrete, and steel demolition material at the Hill 78 OPCA, as necessary, to facilitate proper consolidation. In addition, GE proposes to further downsize such materials by crushing the brick and concrete materials to 2 inches in diameter or less, as well as further downsizing steel to approximately 2 to 3 feet in largest dimension. These processing requirements are much more stringent than what was previously accepted at the OPCAs for demolition debris (i.e., 6 feet in largest dimension). By further processing these materials, consolidation and compaction of these materials will be achieved more effectively, and the final subgrade surface that is established at the Hill 78 OPCA will be much more amenable to the placement of final cover materials.

Therefore, following consolidation of these demolition materials at the Hill 78 OPCA, it is anticipated that up to approximately 22,500 cy of crushed brick and concrete materials (meeting applicable CD Performance Standards for use in residential areas) would be available for on-site placement. In coordination with PEDDA, GE has evaluated various potential options for the placement of these materials consistent with the conditions described in PEDDA's aforementioned July 9, 2007 letter to EPA. Based on discussions with PEDDA, GE and PEDDA currently anticipate that the crushed materials from Buildings 7, 11, 16, 17, 17C, and 19 will be used for the following purposes:

1. Backfilling of Vaults, Pits, and other Subsurface Voids within the 19s Complex – As discussed previously, backfill will be placed as needed to fill subsurface voids in and around the buildings subject to demolition and also to create a level grade between the slabs and the surrounding surfaces. A portion of the crushed materials available from Buildings 7, 11, 16, 17, 17C, and 19 is anticipated to be used as part of the fill material that would be necessary to fill these subsurface voids. Based on a preliminary assessment, it is estimated that up to approximately 800 cy could potentially be required to backfill these areas.
2. Extending the Tyler Street embankment along the northern face of Buildings 7, 17, and 17C – This placement plan is a modification to the placement plan presented in GE's May 30, 2007 letter regarding Buildings 7, 17, 17C, and 19. As discussed in that letter, following removal of Building 17, there will be an elevation change ranging up to approximately 12 feet from Tyler Street to the remaining floor slab of Building 17. A portion of the crushed materials available from Buildings 7, 17, 17C, and 19, as well as those materials available from Buildings 11 and 16, is anticipated to be



used as part of the fill material to extend the embankment along the northern portion of the former Building 17 and 17C slabs, as well as the Building 7 area (located on GE-owned property outside the 19s Complex but immediately adjacent to Building 17). This placement plan will provide a smoother transition from Tyler Street to these areas and will also serve to promote a more aesthetically pleasing, landscaped appearance. A conceptual illustration of this proposed grading plan is shown on Figures 10 through 12. The conceptual grading plan shown on Figures 10 through 12 represents the placement of approximately 15,000 cy of in-place fill material. (The contours shown thereon may be lessened, in vertical and/or horizontal directions, if the volume of available crushed fill material is less than 15,000 cy for this application.)

3. Creating an embankment along the Woodlawn Avenue retaining wall – Following removal of Building 11, there will be an elevation change ranging up to approximately 17 feet from Woodlawn Avenue to the remaining floor slab of Building 11. This elevation change will be partitioned by a vertical concrete retaining wall that currently supports Woodlawn Avenue and a portion of Building 11. Based on a preliminary structural assessment of this wall, it is believed that the wall may be partially supported by Building 11. Following removal of Building 11, additional lateral support may be required to maintain the structural integrity of the wall and the portion of Woodlawn Avenue that it supports. It is anticipated that a portion of the crushed materials available from Buildings 7, 11, 16, 17, 17C, and 19 will be used to construct an embankment extending down from the eastern portion of Woodlawn Avenue to the post-demolition Building 11 slab area. A conceptual illustration of this proposed grading plan is shown on Figure 13. The conceptual grading plan shown on Figure 13 represents the placement of approximately 6,700 cy of in-place fill material. (The contours shown thereon may be lessened, in vertical and/or horizontal directions, if the volume of available crushed fill material is less than 6,700 cy for this application.)

The cumulative total of the estimated volumes associated with the above placement plans is approximately 22,500 cy, which is congruent with the anticipated volume of crushed demolition materials that may potentially be available for placement. Where the crushed material is used to backfill subsurface voids within paved areas, the final surface will be patched with either concrete or asphalt to match the surrounding surface features. Where the crushed material is used for grading material, as in the second and third placement plans described above, it will be placed consistent with the following parameters:

- a) The horizontal limits of fill material will generally not extend beyond the horizontal limits shown on Figures 10 through 13, unless unanticipated field conditions warrant and EPA concurs with a modification.
- b) The slope of the embankments will not exceed 25% (4 horizontal to 1 vertical).
- c) The northern edge of the embankments will be tapered into the existing grade along Tyler Street and Woodlawn Avenue.
- d) Geotextile fabric will be placed on existing unpaved surfaces to serve as a physical barrier between existing soils and new fill material.
- e) The fill used to construct the embankment will be placed in approximate 12-inch-thick lifts and each lift will be properly compacted.
- f) All fill material will be covered with a minimum of one foot of soil, and the surface of that soil cover will be hydroseeded to establish vegetative growth.
- g) The embankment will be contoured to minimize potential erosion and sedimentation.
- h) Erosion control matting will be installed along the northern edge of the embankments, where necessary, to further minimize erosion/formation of gullies as a result of stormwater runoff.

- i) Riprap and 2-inch stone will be installed along the toe of the embankments to dissipate stormwater runoff.
- j) Dust suppression measures will be implemented during placement of the fill materials so as to provide a condition of "no visible dust," and such dust suppression measures will continue until such time that the vegetative cover material is completely installed.

The above placement plans will be implemented as part of the collective Buildings 7, 11, 16, 17, 17C, and 19 Demolition and Site Restoration Program. The collective demolition of these buildings (including material segregation, processing, and transport to the Hill 78 OPCA) is estimated to occur over a timeframe of approximately 12 months. The placement of this material will be implemented directly following these demolition and material handling activities. Specifically, GE proposes to: (1) commence the structural demolition of Buildings 7, 11, 16, 17, 17C, and 19 within one month after receipt of all necessary regulatory approvals for GE's current on-site placement plan; (2) complete the demolition and material handling activities within 12 months thereafter (barring any unanticipated, significant delays – e.g., inclement weather, equipment malfunction/unavailability); and (3) complete the crushed material placement, as part of the overall site restoration activities, within up to 4 months after completion of the demolition and associated material handling (subject to suitable weather conditions required for vegetative plantings). Subsequently, the management of the placed materials will be subject to any applicable provisions of the Grants of Environmental Restrictions and Easements (EREs) for the receiving areas, once the EREs are in place.

While the placement plans described above represent the uses that GE and PEDA currently anticipate for the crushed materials from these buildings, PEDA has requested that it have the ability to use the materials elsewhere. Thus, under the proposed approach, to the extent that the crushed materials are not used for the above purposes or if PEDA should wish to re-use those materials elsewhere at the PEDA Properties, PEDA would have the ability to use those materials for backfill or grading purposes at other locations at the PEDA Properties, without any additional sampling, subject to EPA approval of the specific plans and subject to any applicable provisions of the ERE(s) for the area(s) where the materials will be placed.

Furthermore, if PEDA should determine that it cannot use some or all of the crushed materials and/or wishes such materials to be removed from the PEDA Properties, GE will arrange for the disposition of those materials outside the PEDA Properties – either at the Hill 78 OPCA (if still open) or at an authorized off-site disposal facility or, upon specific application to and approval by EPA, for an alternate on-site use at the GE Plant Area. At this time, GE anticipates that such alternate use would consist of using the crushed building material as fill to support landscaping efforts in the 60s Complex along East Street (within East Street Area 2-South). Such landscaping may include using the crushed material to construct an approximately 6-foot-high berm along the length of East Street adjacent to the 60s Complex. Following placement of the crushed fill, a minimum one-foot soil cover would be placed over the fill and the surface would be hydroseeded to establish vegetative growth. In addition, numerous trees would be planted along the plateau of the berm. This application could serve many purposes, primarily in that it would provide a visual barrier to the existing industrial appearance of this area and provide for a more aesthetically pleasing, landscaped appearance. Further, this potential plan would not involve the placement of any materials within the boundary of the 100-year floodplain of the Housatonic River. A conceptual illustration of such a placement plan is shown on Figures 14 through 16. In the event that this contingency should arise, GE would submit to EPA for review and approval a specific plan for this use or other alternate plan proposed by GE for use of the crushed materials at the GE Plant Area.

GE proposes that, following EPA's approval of the plan described above, a single CD modification be prepared to allow the placement of the crushed building materials from Buildings 7, 11, 16, 17, 17C, and 19 in accordance with that plan. Since the placement of the crushed building materials would thus be conducted in accordance with the CD as modified, it would be subject to the on-site permit exemption in Section 121(e)(1) of CERCLA and Paragraph 9.a of the CD. As such, no federal, state, or local permits would be required. However, the proposed on-site disposition of these materials would meet the substantive requirements of applicable federal and state regulations. We have shown above that this disposition would meet applicable TSCA and RCRA requirements, and that the materials to be placed on-site would meet the Method 1 S-1 soil standards in the MCP. Attachment 2 to this letter demonstrates that GE's plan for the on-site use of these crushed materials would meet the substantive requirements of the MDEP's solid waste management regulations in 310 CMR 19.000, specifically, the substantive requirements for beneficial use of solid waste (310 CMR 19.060).

For the building demolition materials to be consolidated at the Hill 78 OPCA, such consolidation will be conducted consistent with the provisions of the CD and SOW regarding use of the Hill 78 OPCA. Specifically, GE will not consolidate at the OPCA free liquids, intact drums or other equipment that contain liquid PCBs, or asbestos-containing material required by applicable law to be removed from structures prior to demolition. Materials that are unsuitable for placement at the OPCA will be disposed of at an appropriate off-site disposal facility. The transport, handling, placement, and grading of the demolition debris at the OPCA will be performed in accordance with all applicable OPCA requirements, including GE's *2006 Addendum to OPCA Work Plan*.

If EPA has any comments or questions concerning this letter, please contact me at your earliest convenience.

Sincerely,



Michael T. Carroll  
Manager, Pittsfield Remediation Programs

#### Attachments

cc:	T. Conway, EPA*	T. Bowers, Gradient
	J. Kilborn, EPA	R. McLaren, GE
	H. Inglis, EPA	A. Silber, GE*
	R. Howell, EPA*	R. Gates, GE
	S. Steenstrup, MDEP (2 copies)	J. Bieke, Goodwin Procter
	J. Rothchild, MDEP	S. Gutter, Sidley Austin
	A. Symington, MDEP	J. Nuss, ARCADIS BBL
	K.C. Mitkevicius, USACE	GE Internal Repositories
	L. Palmieri, Weston (2 copies)	Public Information Repositories
	Mayor J. Ruberto, City of Pittsfield	
	T. Hickey, Director, PEDDA	(* without attachments)
	J. Bernstein, BCK Law	

**Tables**

**TABLE 1  
PCB DATA**

**BUILDINGS 11 AND 16 CHARACTERIZATION SAMPLING  
EAST STREET AREA 2 - NORTH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in dry weight parts per million, ppm)**

Sample ID	Date Collected	Aroclor-1016, -1221, -1232, -1248	Aroclor -1242	Aroclor-1254	Aroclor-1260	Total PCBs
11-1-W1	1/24/2007	ND(0.49)	ND(0.49)	3.1	ND(0.49)	3.1
11-1-W3	1/24/2007	ND(1.0)	ND(1.0)	11	ND(1.0)	11
11-1-W4	1/24/2007	ND(4.8)	ND(4.8)	39	ND(4.8)	39
11-1-W6	1/24/2007	ND(0.051)	ND(0.051)	0.17	ND(0.051)	0.17
11-1-W7	1/24/2007	ND(0.051)	ND(0.051)	0.62	ND(0.051)	0.62
11-1-W9	1/24/2007	ND(4.7)	ND(4.7)	24	ND(4.7)	24
11-2-F1	1/23/2007	ND(0.045)	ND(0.045)	0.022 J	ND(0.045)	0.022 J
11-2-F3	1/23/2007	ND(0.25)	ND(0.25)	1.1	ND(0.25)	1.1
11-2-F4	1/23/2007	ND(0.050)	ND(0.050)	0.55	ND(0.050)	0.55
11-2-F5	1/23/2007	ND(0.048)	ND(0.048)	0.54	ND(0.048)	0.54
11-2-W1	1/23/2007	ND(0.24)	ND(0.24)	0.83	ND(0.24)	0.83
11-2-W2	1/23/2007	ND(50)	ND(50)	140	ND(50)	140
11-2-W5	1/23/2007	ND(48)	ND(48)	69	ND(48)	69
11-3-F1	1/23/2007	ND(0.044)	ND(0.044)	0.45	ND(0.044)	0.45
11-3-F3	1/23/2007	ND(0.25) [ND(0.25)]	ND(0.25) [ND(0.25)]	2.0 [1.6]	ND(0.25) [ND(0.25)]	2.0 [1.6]
11-3-F4	1/23/2007	ND(0.049)	ND(0.049)	0.24	ND(0.049)	0.24
11-3-W1	1/23/2007	ND(4.0)	ND(4.0)	32	ND(4.0)	32
11-3-W3	1/23/2007	ND(4.1)	ND(4.1)	22	ND(4.1)	22
11-3-W4	1/23/2007	ND(0.044)	ND(0.044)	0.17	ND(0.044)	0.17
11-PH-F1	1/23/2007	ND(0.25)	ND(0.25)	1.1	ND(0.25)	1.1
16-1-W1	1/16/2007	ND(0.050)	ND(0.050)	0.43	0.25	0.68
16-1-W3	1/16/2007	ND(5.0)	ND(5.0)	6.6	ND(5.0)	6.6
16-1-W5	1/16/2007	ND(0.49)	ND(0.49)	1.9	0.70	2.6
16-1-W6	1/16/2007	ND(4.9)	ND(4.9)	6.2	ND(4.9)	6.2
16-1-W8	1/16/2007	ND(0.050)	ND(0.050)	0.39	0.27	0.66
16-2-F2	1/17/2007	ND(0.48)	3.3	1.7	ND(0.48)	5.0
16-2-F3	1/17/2007	ND(1.0)	ND(1.0)	5.2	4.3	9.5
16-2-F4	1/17/2007	ND(0.051)	ND(0.051)	0.80	0.53	1.33
16-2-W1	1/16/2007	ND(0.050)	ND(0.050)	0.45	0.19	0.64
16-2-W4	1/16/2007	ND(0.045)	ND(0.045)	0.45	0.18	0.63
16-3-F2	1/18/2007	ND(0.10)	0.39	0.32	0.19	0.90
16-3-F3	1/18/2007	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)
16-3-F4	1/18/2007	ND(0.050)	ND(0.050)	ND(0.050)	ND(0.050)	ND(0.050)
16-3-W2	1/18/2007	ND(0.49)	ND(0.49)	1.5	0.45 J	1.95
16-3-W4	1/18/2007	ND(0.049)	ND(0.049)	0.31	0.094	0.404
16-4-F1	1/17/2007	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)
16-4-F2	1/17/2007	ND(0.048)	0.028 J	0.018 J	ND(0.048)	0.046 J
16-4-F3	1/17/2007	ND(0.16)	ND(0.16)	0.90	0.72	1.62
16-4-F4	1/17/2007	ND(0.049)	ND(0.049)	0.13	ND(0.049)	0.13
16-4-W1	1/17/2007	ND(0.44)	ND(0.44)	0.95	0.66	1.61
16-4-W3	1/17/2007	ND(0.045) J [ND(0.051)]	ND(0.045) J [ND(0.051)]	0.55 J [0.87]	0.24 J [0.34]	0.79 J [1.21]
16-4-W5	1/17/2007	ND(0.051)	ND(0.051)	0.41	0.20	0.61
16-5-F1	1/17/2007	ND(0.050)	ND(0.050)	0.61	0.88	1.49

- Notes:**
1. Samples were collected by ARCADIS BBL, and submitted for analysis of PCBs.
  2. Samples have been validated as per Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP), General Electric Company, Pittsfield, Massachusetts.
  3. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.
  4. Field duplicate sample results are presented in brackets.
  5. Highlighted rows indicate sample results from portions of Building 11 that require segregation for off-site disposition as TSCA material.

**Data Qualifiers:**

J - Indicates an estimated value less than the practical quantitation limit (PQL).

**TABLE 2  
TCLP DATA**

**BUILDINGS 11 AND 16 CHARACTERIZATION SAMPLING  
EAST STREET AREA 2 - NORTH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in parts per million, ppm)**

Parameter	Sample ID: Date Collected:	TCLP Regulatory Limits	11-TCLP-A-1 01/23/07	11-TCLP-A-2 01/24/07	16-TCLP-A-1 1/17/2007	16-TCLP-B-1 1/18/2007
<b>Volatile Organics</b>						
1,1-Dichloroethene		0.7	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
1,2-Dichloroethane		0.5	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
2-Butanone		200	ND(0.25) J	ND(0.25) J	0.013 J	ND(0.25)
Benzene		0.5	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
Carbon Tetrachloride		0.5	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
Chlorobenzene		100	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
Chloroform		6	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
Tetrachloroethene		0.7	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
Trichloroethene		0.5	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
Vinyl Chloride		0.2	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
<b>Semivolatile Organics</b>						
1,4-Dichlorobenzene		7.5	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
2,4,5-Trichlorophenol		400	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
2,4,6-Trichlorophenol		2	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
2,4-Dinitrotoluene		0.13	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
Cresol		200	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
Hexachlorobenzene		0.13	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
Hexachlorobutadiene		0.5	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
Hexachloroethane		3	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
Nitrobenzene		2	ND(0.010)	ND(0.010)	ND(0.010)	ND(0.010)
Pentachlorophenol		100	ND(0.050)	ND(0.050)	ND(0.050)	0.039 J
Pyridine		5	R	R	R	R
<b>Inorganics-Unfiltered</b>						
Arsenic		5	ND(0.200)	ND(0.200)	ND(0.200)	ND(0.200)
Barium		100	0.192 B	0.345 B	0.480 B	0.404 B
Cadmium		1	ND(0.100)	ND(0.100) J	0.0125 J	0.00980 J
Chromium		5	0.0449 B	0.0395 B	0.0397 J	0.0191 J
Lead		5	ND(0.100)	0.0224 B	ND(0.100) J	ND(0.100) J
Mercury		0.2	0.000130 B	0.000404 B	ND(0.00057)	0.0000577 B
Selenium		1	ND(0.200) J	ND(0.200) J	ND(0.200)	ND(0.200)
Silver		5	ND(0.100) J	ND(0.100) J	ND(0.100)	ND(0.100)

**Notes:**

1. Samples were collected by ARCADIS BBL, and submitted for TCLP analyses.
2. Samples have been validated as per Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP), General Electric Company, Pittsfield, Massachusetts.
3. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.

**Data Qualifiers:**

Organics (volatiles, semivolatiles)

- J - Indicates that the associated numerical value is an estimated concentration.
- R - Data was rejected due to a deficiency in the data generation process. Refer to Attachment 1 for more details.

Inorganics

- B - Indicates an estimated value between the instrument detection limit (IDL) and practical quantitation limit (PQL).
- J - Indicates that the associated numerical value is an estimated concentration.

**TABLE 3  
APPENDIX IX+3 DATA**

**BUILDINGS 11 AND 16 CHARACTERIZATION SAMPLING  
EAST STREET AREA 2 - NORTH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in dry weight parts per million, ppm)**

Parameter	Sample ID: Date Collected:	11-1-W2 01/24/07	11-1-W5 01/24/07	11-1-W8 01/24/07	11-2-F2 01/23/07	11-2-W3 01/23/07
<b>Volatile Organics</b>						
2-Butanone		ND(0.0044) J [ND(0.0050)]	ND(0.0047) J	ND(0.0047) J	ND(0.0044) J	ND(0.0043) J
Acetone		0.027 J [0.023]	0.019 J	0.018 J	0.030 J	0.014 J
Ethylbenzene		0.0038 J [0.0032 J]	ND(0.0047)	ND(0.0047)	ND(0.0044) J	ND(0.0043)
Toluene		0.030 [0.024]	0.012	0.0033 J	0.031 J	ND(0.0043)
Xylenes (total)		0.020 [0.015]	0.0032 J	ND(0.0047)	ND(0.0044) J	ND(0.0043)
<b>Semivolatile Organics</b>						
1,2,4-Trichlorobenzene		ND(0.31) [ND(0.32)]	ND(0.31)	ND(0.33)	ND(0.31)	ND(0.31)
2-Methylnaphthalene		0.14 J [0.16 J]	ND(0.31)	ND(0.33)	ND(0.31)	ND(0.31)
Anthracene		ND(0.31) [ND(0.32)]	ND(0.31)	ND(0.33)	ND(0.31)	ND(0.31)
Benzo(a)anthracene		ND(0.31) [ND(0.32)]	ND(0.31)	ND(0.33)	ND(0.31)	ND(0.31)
Benzo(b)fluoranthene		ND(0.31) [ND(0.32)]	ND(0.31)	ND(0.33)	ND(0.31)	ND(0.31)
Benzyl Alcohol		ND(0.62) [ND(0.63)]	ND(0.63)	ND(0.65)	0.066 J	ND(0.62)
bis(2-Ethylhexyl)phthalate		0.12 J [0.14 J]	ND(0.31)	ND(0.33)	5.0	ND(0.31)
Butylbenzylphthalate		0.34 [0.40]	ND(0.31)	ND(0.33)	0.86	ND(0.31)
Chrysene		ND(0.31) [ND(0.32)]	ND(0.31)	ND(0.33)	ND(0.31)	ND(0.31)
Diethylphthalate		0.084 J [0.086 J]	ND(0.31)	ND(0.33)	ND(0.31)	ND(0.31)
Di-n-Butylphthalate		0.18 J [0.18 J]	0.076 J	ND(0.33)	ND(0.31)	ND(0.31)
Fluoranthene		ND(0.31) [ND(0.32)]	0.094 J	ND(0.33)	ND(0.31)	ND(0.31)
Isophorone		ND(0.31) [ND(0.32)]	ND(0.31)	0.52	0.091 J	ND(0.31)
Naphthalene		0.15 J [0.17 J]	0.050 J	ND(0.33)	ND(0.31)	ND(0.31)
Pentachlorophenol		ND(1.6) [ND(1.6)]	R	R	R	ND(1.6)
Phenanthrene		0.18 J [0.21 J]	0.14 J	ND(0.33)	ND(0.31)	ND(0.31)
Pyrene		ND(0.31) [ND(0.32)]	ND(0.31)	ND(0.33)	ND(0.31)	ND(0.31)
<b>Inorganics</b>						
Antimony		ND(4.03) J [ND(3.97)]	ND(3.48)	ND(4.21)	ND(4.04)	ND(4.00)
Arsenic		4.83 [5.69]	4.00	3.32	5.84	0.560 B
Barium		145 J [171 J]	51.6 J	77.7 J	39.3	5.34 J
Beryllium		0.412 J [ND(0.993) J]	0.0296 J	ND(1.05) J	0.156 J	ND(1.00) J
Cadmium		ND(1.01) J [ND(0.993) J]	0.472 J	ND(1.05) J	ND(1.01)	ND(1.00)
Chromium		9.38 [11.3]	7.00	11.9	12.6	1.09
Cobalt		7.59 [9.22]	7.02	4.65	6.25	2.12 J
Copper		25.2 J [33.2 J]	13.4 J	8.84 J	10.8	1.46
Lead		2.37 J [2.65 J]	10.1	39.7	3.95	0.348 J
Mercury		1.26 [1.48]	0.0205	0.0566	0.00622 B	ND(0.0189)
Nickel		12.6 [14.8]	10.8	6.95	10.1	1.96 J
Silver		0.114 J [ND(0.993)]	ND(0.870)	0.0959 J	ND(1.01) J	ND(1.00) J
Thallium		ND(1.01) J [ND(0.993) J]	0.818 J	ND(1.05) J	0.542 J	ND(1.00) J
Vanadium		14.1 [16.7]	6.84	5.26 B	10.5	ND(5.00)
Zinc		20.2 [23.4]	43.9	24.8	28.5	ND(2.00)

**TABLE 3  
APPENDIX IX+3 DATA**

**BUILDINGS 11 AND 16 CHARACTERIZATION SAMPLING  
EAST STREET AREA 2 - NORTH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in dry weight parts per million, ppm)**

Parameter	Sample ID: Date Collected:	11-2-W4 01/23/07	11-3-F2 01/23/07	11-3-W2 01/23/07	11-PH-W1 01/23/07	16-1-W2 01/16/07
<b>Volatile Organics</b>						
2-Butanone		ND(0.0044) J	0.0032 J	ND(0.0050) J	ND(0.0049) J	ND(0.0046) J
Acetone		ND(0.0044) J	0.033 J	ND(0.0050) J	0.021 J	0.019 J
Ethylbenzene		ND(0.0044) J	ND(0.0047)	ND(0.0050) J	ND(0.0049)	ND(0.0046) J
Toluene		0.0050 J	0.0099	ND(0.0050) J	ND(0.0049)	0.0062 J
Xylenes (total)		ND(0.0044) J	ND(0.0047)	ND(0.0050) J	ND(0.0049)	ND(0.0046) J
<b>Semivolatile Organics</b>						
1,2,4-Trichlorobenzene		ND(0.31)	ND(3.1)	ND(0.31)	0.066 J	0.040 J
2-Methylnaphthalene		ND(0.31)	ND(3.1)	ND(0.31)	0.10 J	ND(0.31)
Anthracene		ND(0.31)	ND(3.1)	ND(0.31)	ND(0.32)	ND(0.31)
Benzo(a)anthracene		ND(0.31)	ND(3.1)	ND(0.31)	0.069 J	ND(0.31)
Benzo(b)fluoranthene		ND(0.31)	ND(3.1)	ND(0.31)	0.082 J	ND(0.31)
Benzyl Alcohol		ND(0.62)	2.0 J	ND(0.62)	ND(0.63)	ND(0.61)
bis(2-Ethylhexyl)phthalate		0.071 J	33	ND(0.31)	0.047 J	0.28 J
Butylbenzylphthalate		ND(0.31)	5.2	ND(0.31)	ND(0.32)	ND(0.31)
Chrysene		ND(0.31)	ND(3.1)	ND(0.31)	0.076 J	ND(0.31)
Diethylphthalate		ND(0.31)	ND(3.1)	ND(0.31)	0.044 J	ND(0.31)
Di-n-Butylphthalate		0.044 J	ND(3.1)	ND(0.31)	0.085 J	0.23 J
Fluoranthene		ND(0.31)	ND(3.1)	ND(0.31)	0.12 J	0.049 J
Isophorone		ND(0.31)	ND(3.1)	ND(0.31)	ND(0.32)	ND(0.31)
Naphthalene		ND(0.31)	ND(3.1)	ND(0.31)	0.16 J	ND(0.31)
Pentachlorophenol		ND(1.6)	R	ND(1.6)	ND(1.6) J	R
Phenanthrene		ND(0.31)	ND(3.1)	ND(0.31)	0.19 J	ND(0.31)
Pyrene		ND(0.31)	ND(3.1)	ND(0.31)	0.11 J	ND(0.31)
<b>Inorganics</b>						
Antimony		ND(3.70)	ND(3.90)	ND(3.93)	ND(3.97)	0.0468 J
Arsenic		1.38	4.99	0.951 B	6.73	7.65
Barium		6.20 B	46.4	8.50 B	211	108 J
Beryllium		0.176 J	ND(0.974) J	ND(0.983) J	ND(0.991) J	ND(0.974)
Cadmium		ND(0.463)	ND(0.974)	ND(0.983)	ND(0.991)	0.0205 J
Chromium		1.32	8.90	1.25	11.4	9.69
Cobalt		1.25 J	5.08	1.60 J	8.88	7.44
Copper		4.94	9.83	1.65 J	29.9	10.3
Lead		ND(0.926) J	3.99	ND(0.983) J	2.28 J	9.56 J
Mercury		ND(0.0196)	0.236	ND(0.0201)	0.697	0.0403
Nickel		1.48 J	8.41	1.08 J	14.7	10.5
Silver		ND(0.926) J	ND(0.974) J	ND(0.983) J	ND(0.991) J	ND(0.974)
Thallium		ND(0.926) J	ND(0.974) J	ND(0.983) J	ND(0.991) J	ND(0.974) J
Vanadium		ND(4.63)	9.67	ND(4.91)	18.2	12.4
Zinc		ND(1.85)	25.7	ND(1.97)	66.2	71.5 J



**TABLE 3  
APPENDIX IX+3 DATA**

**BUILDINGS 11 AND 16 CHARACTERIZATION SAMPLING  
EAST STREET AREA 2 - NORTH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in dry weight parts per million, ppm)**

Parameter	Sample ID: ate Collected:	16-1-W4 01/16/07	16-1-W7 01/16/07	16-2-F1 01/17/07	16-2-W2 01/16/07	16-2-W3 01/16/07
<b>Volatile Organics</b>						
2-Butanone		0.0039 J [ND(0.0051) J]	ND(0.0048) J	ND(0.0048)	0.0029 J	ND(0.0050) J
Acetone		0.028 J [0.023 J]	0.017 J	0.016	0.024 J	0.019 J
Ethylbenzene		ND(0.0048) J [ND(0.0051) J]	ND(0.0048)	ND(0.0048)	ND(0.0050)	ND(0.0050)
Toluene		ND(0.0048) J [ND(0.0051) J]	0.0067	0.053 J	0.014	0.0070
Xylenes (total)		ND(0.0048) J [ND(0.0051) J]	ND(0.0048)	ND(0.0048)	ND(0.0050)	ND(0.0050)
<b>Semivolatile Organics</b>						
1,2,4-Trichlorobenzene		ND(0.33) J [ND(0.32)]	0.044 J	ND(0.31)	ND(0.32)	ND(0.31)
2-Methylnaphthalene		ND(0.33) J [ND(0.32)]	ND(0.32)	ND(0.31)	ND(0.32)	ND(0.31)
Anthracene		ND(0.33) J [ND(0.32)]	ND(0.32)	0.21 J	ND(0.32)	ND(0.31)
Benzo(a)anthracene		ND(0.33) J [ND(0.32)]	ND(0.32)	ND(0.31)	ND(0.32)	ND(0.31)
Benzo(b)fluoranthene		ND(0.33) J [ND(0.32)]	ND(0.32)	ND(0.31)	ND(0.32)	ND(0.31)
Benzyl Alcohol		ND(0.66) J [ND(0.64)]	ND(0.63)	ND(0.62)	ND(0.63)	ND(0.63)
bis(2-Ethylhexyl)phthalate		ND(0.33) J [ND(0.32)]	0.21 J	ND(0.31)	1.0	0.14 J
Butylbenzylphthalate		ND(0.33) J [ND(0.32)]	ND(0.32)	ND(0.31)	0.27 J	ND(0.31)
Chrysene		ND(0.33) J [ND(0.32)]	ND(0.32)	0.050 J	0.041 J	ND(0.31)
Diethylphthalate		ND(0.33) J [ND(0.32)]	ND(0.32)	ND(0.31)	0.054 J	ND(0.31)
Di-n-Butylphthalate		ND(0.33) J [ND(0.32)]	0.73	ND(0.31)	0.51	0.20 J
Fluoranthene		ND(0.33) J [0.051 J]	0.057 J	ND(0.31)	0.15 J	0.044 J
Isophorone		ND(0.33) J [ND(0.32)]	ND(0.32)	0.21 J	ND(0.32)	ND(0.31)
Naphthalene		ND(0.33) J [ND(0.32)]	ND(0.32)	0.053 J	ND(0.32)	ND(0.31)
Pentachlorophenol		R [R]	R	R	R	R
Phenanthrene		0.039 J [0.070 J]	ND(0.32)	0.21 J	0.12 J	0.072 J
Pyrene		ND(0.33) J [ND(0.32)]	ND(0.32)	0.074 J	0.092 J	ND(0.31)
<b>Inorganics</b>						
Antimony		0.0888 J [0.105 J]	0.492 J	0.0319 B	0.0833 J	0.0696 J
Arsenic		6.77 [6.58]	3.91	6.47	9.75	9.14
Barium		94.1 J [235 J]	185 J	61.0	127 J	106 J
Beryllium		ND(1.02) [ND(1.01)]	ND(0.903)	ND(1.16)	ND(0.858)	ND(0.940)
Cadmium		0.265 B [0.379 B]	0.187 B	0.0590 J	0.478 B	0.0545 B
Chromium		15.6 [15.6]	13.3	9.72	16.6	12.5
Cobalt		8.76 [8.16]	11.3	6.20	9.27	7.87
Copper		14.7 [12.8]	19.2	10.5	9.76	14.2
Lead		45.9 J [184 J]	16.8 J	4.93	60.5 J	20.5 J
Mercury		0.0143 B [0.0455]	0.0189	ND(0.0175)	0.00721 B	0.00618 B
Nickel		18.9 [16.8]	12.0	10.9	14.9	12.9
Silver		ND(1.02) [ND(1.01)]	ND(0.903)	ND(0.937)	ND(0.858)	ND(0.940)
Thallium		ND(1.02) [ND(1.01)]	ND(0.903)	ND(0.937)	ND(0.858)	ND(0.940)
Vanadium		13.3 [12.6]	9.45	12.3	17.4	16.1
Zinc		73.4 J [169 J]	163 J	27.0	142 J	80.3 J

**TABLE 3  
APPENDIX IX+3 DATA**

**BUILDINGS 11 AND 16 CHARACTERIZATION SAMPLING  
EAST STREET AREA 2 - NORTH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in dry weight parts per million, ppm)**

Parameter	Sample ID: ate Collected:	16-3-F1 01/18/07	16-3-W1 01/18/07	16-3-W3 01/18/07	16-4-F1 01/29/07	16-4-W2 01/17/07	16-4-W4 01/17/07
<b>Volatile Organics</b>							
2-Butanone		ND(0.0048) J	ND(0.0047) J	ND(0.0044) J	ND(0.0044)	ND(0.0045)	ND(0.0052)
Acetone		0.019 J	0.016 J	ND(0.0044) J	0.0050	0.020	0.016
Ethylbenzene		ND(0.0048)	ND(0.0047)	ND(0.0044)	ND(0.0044)	ND(0.0045)	ND(0.0052)
Toluene		0.016	0.030 J	0.012	0.0048	0.033	0.051
Xylenes (total)		ND(0.0048)	ND(0.0047)	ND(0.0044)	ND(0.0044)	ND(0.0045)	ND(0.0052)
<b>Semivolatile Organics</b>							
1,2,4-Trichlorobenzene		ND(0.31)	ND(0.31)	ND(0.30)	ND(0.31)	ND(0.31)	ND(0.33)
2-Methylnaphthalene		ND(0.31)	ND(0.31)	ND(0.30)	ND(0.31)	ND(0.31)	ND(0.33)
Anthracene		ND(0.31)	ND(0.31)	ND(0.30)	ND(0.31)	ND(0.31)	0.32 J
Benzo(a)anthracene		ND(0.31)	ND(0.31)	0.053 J	ND(0.31)	ND(0.31)	ND(0.33)
Benzo(b)fluoranthene		ND(0.31)	ND(0.31)	ND(0.30)	ND(0.31)	ND(0.31)	ND(0.33)
Benzyl Alcohol		ND(0.62)	ND(0.62)	ND(0.59)	ND(0.61)	ND(0.62)	ND(0.66)
bis(2-Ethylhexyl)phthalate		ND(0.31)	ND(0.31)	0.21 J	ND(0.31)	0.11 J	0.53
Butylbenzylphthalate		ND(0.31)	ND(0.31)	0.27 J	ND(0.31)	ND(0.31)	1.2
Chrysene		ND(0.31)	ND(0.31)	0.068 J	ND(0.31)	ND(0.31)	0.075 J
Diethylphthalate		ND(0.31)	ND(0.31)	ND(0.30)	ND(0.31)	ND(0.31)	0.079 J
Di-n-Butylphthalate		ND(0.31)	0.50	1.3	ND(0.31)	1.2	3.0
Fluoranthene		ND(0.31)	0.15 J	0.81	ND(0.31)	0.097 J	0.31 J
Isophorone		ND(0.31)	ND(0.31)	ND(0.30)	ND(0.31)	ND(0.31)	ND(0.33)
Naphthalene		ND(0.31)	ND(0.31)	ND(0.30)	ND(0.31)	ND(0.31)	ND(0.33)
Pentachlorophenol		R	R	1.1 J	R	R	0.92 J
Phenanthrene		0.090 J	0.24 J	1.3	ND(0.31)	0.084 J	0.31 J
Pyrene		ND(0.31)	0.084 J	0.44	ND(0.31)	0.066 J	0.19 J
<b>Inorganics</b>							
Antimony		0.0628 B	0.155 B	0.0463 B	ND(3.74)	0.0538 B	0.143 B
Arsenic		10.8	7.68	7.18	5.13	5.87	11.2
Barium		116	56.9	89.6	79.0	85.5	586
Beryllium		ND(0.997)	ND(0.997)	ND(0.997)	ND(0.934) J	ND(1.04)	ND(1.04)
Cadmium		ND(0.997) J	ND(0.944) J	ND(0.945) J	0.335 J	0.0527 J	0.230 J
Chromium		15.6	12.7	12.2	7.79	8.66	347
Cobalt		6.95	7.16	5.05	11.7	8.17	21.6
Copper		16.7	16.6	13.2	16.8	11.2	11.7
Lead		4.57	6.09	6.40	4.43	16.0	34.1
Mercury		0.00586 B	0.0220	0.00382 B	ND(0.0198)	0.00458 B	0.00623 B
Nickel		14.1	9.43	9.32	12.8	9.02	48.8
Silver		ND(0.997)	ND(0.944)	ND(0.945)	ND(0.934)	ND(1.01)	ND(1.04)
Thallium		ND(0.997) J	ND(0.944) J	ND(0.945) J	ND(0.934) J	ND(1.01)	ND(1.04)
Vanadium		24.9	22.7	18.4	11.3	11.1	50.2
Zinc		88.2	19.6	38.0	38.0	92.7	268

**Notes:**

1. Samples were collected by ARCADIS BBL, and submitted for analysis of Appendix IX+3 VOCs, SVOCs, and inorganics.
2. Samples have been validated as per Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP), General Electric Company, Pittsfield, Massachusetts.
3. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.
4. Field duplicate sample results are presented in brackets.
5. Only those constituents detected in one or more samples are summarized.

**Data Qualifiers:**

Organics (volatiles, semivolatiles)

- J - Indicates that the associated numerical value is an estimated concentration.
- R - Data was rejected due to a deficiency in the data generation process. Refer to Attachment 1 for more details.

Inorganics

- B - Indicates an estimated value between the instrument detection limit (IDL) and practical quantitation limit (PQL).
- J - Indicates that the associated numerical value is an estimated concentration.

**TABLE 4  
BUILDINGS 11 AND 16 PCB CONCENTRATIONS OF CRUSHABLE BUILDING MATERIALS**

**BUILDINGS 11 AND 16 CHARACTERIZATION SAMPLING  
EAST STREET AREA 2 - NORTH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in dry weight parts per million, ppm)**

Sample ID	Date Collected	Aroclor-1016, -1221, -1232, -1248	Aroclor-1242	Aroclor-1254	Aroclor-1260	Total PCBs
11-1-W1	1/24/2007	ND(0.49)	ND(0.49)	3.1	ND(0.49)	3.1
11-1-W3	1/24/2007	ND(1.0)	ND(1.0)	11	ND(1.0)	11.0
11-1-W4	1/24/2007	ND(4.8)	ND(4.8)	39	ND(4.8)	39
11-1-W6	1/24/2007	ND(0.051)	ND(0.051)	0.17	ND(0.051)	0.17
11-1-W7	1/24/2007	ND(0.051)	ND(0.051)	0.62	ND(0.051)	0.62
11-1-W9	1/24/2007	ND(4.7)	ND(4.7)	24	ND(4.7)	24
11-2-F1	1/23/2007	ND(0.045)	ND(0.045)	0.022 J	ND(0.045)	0.022 J
11-2-F3	1/23/2007	ND(0.25)	ND(0.25)	1.1	ND(0.25)	1.10
11-2-F4	1/23/2007	ND(0.050)	ND(0.050)	0.55	ND(0.050)	0.55
11-2-F5	1/23/2007	ND(0.048)	ND(0.048)	0.54	ND(0.048)	0.54
11-3-F1	1/23/2007	ND(0.044)	ND(0.044)	0.45	ND(0.044)	0.45
11-3-F3	1/23/2007	ND(0.25) [ND(0.25)]	ND(0.25) [ND(0.25)]	2.0 [1.6]	ND(0.25) [ND(0.25)]	2.0 [1.6]
11-3-F4	1/23/2007	ND(0.049)	ND(0.049)	0.24	ND(0.049)	0.24
11-3-W1	1/23/2007	ND(4.0)	ND(4.0)	32	ND(4.0)	32
11-3-W3	1/23/2007	ND(4.1)	ND(4.1)	22	ND(4.1)	22
11-3-W4	1/23/2007	ND(0.044)	ND(0.044)	0.17	ND(0.044)	0.17
11-PH-F1	1/23/2007	ND(0.25)	ND(0.25)	1.1	ND(0.25)	1.10
<b>Average of Building 11 Samples:</b>						<b>8.11</b>
16-1-W1	1/16/2007	ND(0.050)	ND(0.050)	0.43	0.25	0.68
16-1-W3	1/16/2007	ND(5.0)	ND(5.0)	6.6	ND(5.0)	6.6
16-1-W5	1/16/2007	ND(0.49)	ND(0.49)	1.9	0.70	2.6
16-1-W6	1/16/2007	ND(4.9)	ND(4.9)	6.2	ND(4.9)	6.2
16-1-W8	1/16/2007	ND(0.050)	ND(0.050)	0.39	0.27	0.66
16-2-F2	1/17/2007	ND(0.48)	3.3	1.7	ND(0.48)	5.0
16-2-F3	1/17/2007	ND(1.0)	ND(1.0)	5.2	4.3	9.5
16-2-F4	1/17/2007	ND(0.051)	ND(0.051)	0.80	0.53	1.33
16-2-W1	1/16/2007	ND(0.050)	ND(0.050)	0.45	0.19	0.64
16-2-W4	1/16/2007	ND(0.045)	ND(0.045)	0.45	0.18	0.63
16-3-F2	1/18/2007	ND(0.10)	0.39	0.32	0.19	0.90
16-3-F3	1/18/2007	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)
16-3-F4	1/18/2007	ND(0.050)	ND(0.050)	ND(0.050)	ND(0.050)	ND(0.050)
16-3-W2	1/18/2007	ND(0.49)	ND(0.49)	1.5	0.45 J	1.95
16-3-W4	1/18/2007	ND(0.049)	ND(0.049)	0.31	0.094	0.404
16-4-F1	1/17/2007	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)
16-4-F2	1/17/2007	ND(0.048)	0.028 J	0.018 J	ND(0.048)	0.046 J
16-4-F3	1/17/2007	ND(0.16)	ND(0.16)	0.90	0.72	1.62
16-4-F4	1/17/2007	ND(0.049)	ND(0.049)	0.13	ND(0.049)	0.13
16-4-W1	1/17/2007	ND(0.44)	ND(0.44)	0.95	0.66	1.61
16-4-W3	1/17/2007	ND(0.045) [ND(0.051)]	ND(0.045) [ND(0.051)]	0.55 [0.87]	0.24 [0.34]	0.79 [1.21]
16-4-W5	1/17/2007	ND(0.051)	ND(0.051)	0.41	0.20	0.61
16-5-F1	1/17/2007	ND(0.050)	ND(0.050)	0.61	0.88	1.49
<b>Average of Building 16 Samples:</b>						<b>1.90</b>
<b>Average of All Samples:</b>						<b>4.54</b>

**Notes:**

1. Samples were collected by ARCADIS BBL, and submitted for analysis of PCBs.
2. Samples have been validated as per Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP), General Electric Company, Pittsfield, Massachusetts.
3. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.
4. Highlighted rows indicate sample results from portions of Building 11 that can potentially be segregated to bring the average PCB concentration to less than 2 ppm (while Sample ID 11-3-W4 is less than 2 ppm, it must be eliminated from the revised arithmetic average calculation as it is located between Sample IDs 11-3-W1 and 11-3-W3, and therefore will be subject to segregation and is not representative of the remaining building materials subject to on-site placement).

**TABLE 5  
BUILDINGS 11 AND 16 PCB CONCENTRATIONS OF CRUSHABLE BUILDING MATERIALS  
(FOLLOWING SEGREGATION OF CERTAIN BUILDING MATERIALS)**

**BUILDINGS 11 AND 16 CHARACTERIZATION SAMPLING  
EAST STREET AREA 2 - NORTH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in dry weight parts per million, ppm)**

Sample ID	Date Collected	Aroclor-1016, -1221, -1232, -1248	Aroclor-1242	Aroclor-1254	Aroclor-1260	Total PCBs
11-1-W6	1/24/2007	ND(0.051)	ND(0.051)	0.17	ND(0.051)	0.17
11-1-W7	1/24/2007	ND(0.051)	ND(0.051)	0.62	ND(0.051)	0.62
11-2-F1	1/23/2007	ND(0.045)	ND(0.045)	0.022 J	ND(0.045)	0.022 J
11-2-F3	1/23/2007	ND(0.25)	ND(0.25)	1.1	ND(0.25)	1.10
11-2-F4	1/23/2007	ND(0.050)	ND(0.050)	0.55	ND(0.050)	0.55
11-2-F5	1/23/2007	ND(0.048)	ND(0.048)	0.54	ND(0.048)	0.54
11-3-F1	1/23/2007	ND(0.044)	ND(0.044)	0.45	ND(0.044)	0.45
11-3-F3	1/23/2007	ND(0.25) [ND(0.25)]	ND(0.25) [ND(0.25)]	2.0 [1.6]	ND(0.25) [ND(0.25)]	2.0 [1.6]
11-3-F4	1/23/2007	ND(0.049)	ND(0.049)	0.24	ND(0.049)	0.24
11-PH-F1	1/23/2007	ND(0.25)	ND(0.25)	1.1	ND(0.25)	1.10
<b>Average of Building 11 Samples:</b>						<b>0.66</b>
16-1-W1	1/16/2007	ND(0.050)	ND(0.050)	0.43	0.25	0.68
16-1-W3	1/16/2007	ND(5.0)	ND(5.0)	6.6	ND(5.0)	6.6
16-1-W5	1/16/2007	ND(0.49)	ND(0.49)	1.9	0.70	2.6
16-1-W6	1/16/2007	ND(4.9)	ND(4.9)	6.2	ND(4.9)	6.2
16-1-W8	1/16/2007	ND(0.050)	ND(0.050)	0.39	0.27	0.66
16-2-F2	1/17/2007	ND(0.48)	3.3	1.7	ND(0.48)	5.0
16-2-F3	1/17/2007	ND(1.0)	ND(1.0)	5.2	4.3	9.5
16-2-F4	1/17/2007	ND(0.051)	ND(0.051)	0.80	0.53	1.33
16-2-W1	1/16/2007	ND(0.050)	ND(0.050)	0.45	0.19	0.64
16-2-W4	1/16/2007	ND(0.045)	ND(0.045)	0.45	0.18	0.63
16-3-F2	1/18/2007	ND(0.10)	0.39	0.32	0.19	0.90
16-3-F3	1/18/2007	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)
16-3-F4	1/18/2007	ND(0.050)	ND(0.050)	ND(0.050)	ND(0.050)	ND(0.050)
16-3-W2	1/18/2007	ND(0.49)	ND(0.49)	1.5	0.45 J	1.95
16-3-W4	1/18/2007	ND(0.049)	ND(0.049)	0.31	0.094	0.404
16-4-F1	1/17/2007	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)
16-4-F2	1/17/2007	ND(0.048)	0.028 J	0.018 J	ND(0.048)	0.046 J
16-4-F3	1/17/2007	ND(0.16)	ND(0.16)	0.90	0.72	1.62
16-4-F4	1/17/2007	ND(0.049)	ND(0.049)	0.13	ND(0.049)	0.13
16-4-W1	1/17/2007	ND(0.44)	ND(0.44)	0.95	0.66	1.61
16-4-W3	1/17/2007	ND(0.045) [ND(0.051)]	ND(0.045) [ND(0.051)]	0.55 [0.87]	0.24 [0.34]	0.79 [1.21]
16-4-W5	1/17/2007	ND(0.051)	ND(0.051)	0.41	0.20	0.61
16-5-F1	1/17/2007	ND(0.050)	ND(0.050)	0.61	0.88	1.49
<b>Average of Building 16 Samples:</b>						<b>1.90</b>
<b>Average of All Samples:</b>						<b>1.52</b>

**Notes:**

1. Samples were collected by ARCADIS BBL, and submitted for analysis of PCBs.
2. Samples have been validated as per Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP), General Electric Company, Pittsfield, Massachusetts.
3. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.

**TABLE 6**  
**APPENDIX IX+3 DATA EVALUATION - COMPARISON TO SCREENING CRITERIA**

**BUILDINGS 11 AND 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in dry weight parts per million, ppm)

Parameter	Sample ID: Date Collected:	Maximum Detect	EPA Region 9 Residential PRG	Constituent Retained for Further Evaluation?
<b>Volatile Organics</b>				
2-Butanone		0.0039	6,900	No
Acetone		0.033	1,400	No
Toluene		0.053	520	No
Xylenes (total)		0.0032	210	No
<b>Semivolatile Organics</b>				
1,2,4-Trichlorobenzene		0.066	480	No
2-Methylnaphthalene		0.10	55 *	No
Benzo(a)anthracene		0.069	0.56	No
Benzo(b)fluoranthene		0.082	0.56	No
Benzyl Alcohol		2	16,000	No
bis(2-Ethylhexyl)phthalate		33	32	Yes
Butylbenzylphthalate		5.2	930	No
Chrysene		0.075	56	No
Diethylphthalate		0.079	44,000	No
Di-n-Butylphthalate		3	5,500	No
Fluoranthene		0.097	2,000	No
Isophorone		0.21	470	No
Naphthalene		0.16	55	No
Pentachlorophenol		1.1	2.5	No
Phenanthrene		1.3	55 *	No
Pyrene		0.44	1,500	No
<b>Inorganics</b>				
Antimony		0.492	30	No
Arsenic		11.2	0.38	Yes
Barium		586	5,200	No
Beryllium		0.176	150	No
Cadmium		0.478	37	No
Chromium		347	210	Yes
Cobalt		21.6	3,300	No
Copper		29.9	2,800	No
Lead		184	400	No
Mercury		0.697	22	No
Nickel		48.8	1,500	No
Thallium		0.818	6 **	No
Vanadium		50.2	520	No
Zinc		268	22,000	No

**Notes:**

1. This table presents a comparison of the maximum detected concentrations of select non-PCB Appendix IX+3 constituents within the building materials being considered for re-use to the EPA Region 9 Preliminary Remediation Goals (PRGs) (or surrogate PRGs) for soil in residential areas. The EPA Region 9 PRGs (or surrogate PRGs) are located in Attachment F to the *Statement of Work for Removal Actions Outside the River (SOW)*.
2. \* - No EPA Region 9 PRG exists for 2-Methylnaphthalene or Phenanthrene. Naphthalene was used as the surrogate PRG.
3. \*\* - Indicates that the most stringent PRG value was used for the 7 Thallium compounds listed in the EPA Region 9 PRG table.

TABLE 7  
APPENDIX IX+3 DATA EVALUATION - RETAINED CONSTITUENTS

BUILDINGS 11 AND 16 CHARACTERIZATION SAMPLING  
EAST STREET AREA 2 - NORTH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in dry weight parts per million, ppm)

Parameter	Sample ID: Date Collected:	11-1-W2 01/24/07	11-1-W5 01/24/07	11-1-W8 01/24/07	11-2-F2 01/23/07	11-2-W3 01/23/07	11-2-W4 01/23/07	11-3-F2 01/23/07	11-3-W2 01/23/07	11-PH-W1 01/23/07	16-1-W2 01/16/07	16-1-W4 01/16/07	16-1-W7 01/16/07	16-2-F1 01/17/07
<b>Semivolatile Organics</b>														
bis(2-Ethylhexyl)phthalate		0.13	<b>0.16</b>	<b>0.17</b>	5.00	<b>0.16</b>	0.07	33	<b>0.16</b>	0.05	0.28	<b>0.17</b>	0.21	<b>0.16</b>
<b>Inorganics</b>														
Arsenic		5.26	4.00	3.32	5.84	0.560	1.38	4.99	0.951	6.73	7.65	6.68	3.91	6.47
Chromium		10.34	7.00	11.90	12.60	1.090	1.32	8.90	1.250	11.40	9.69	15.60	13.30	9.72

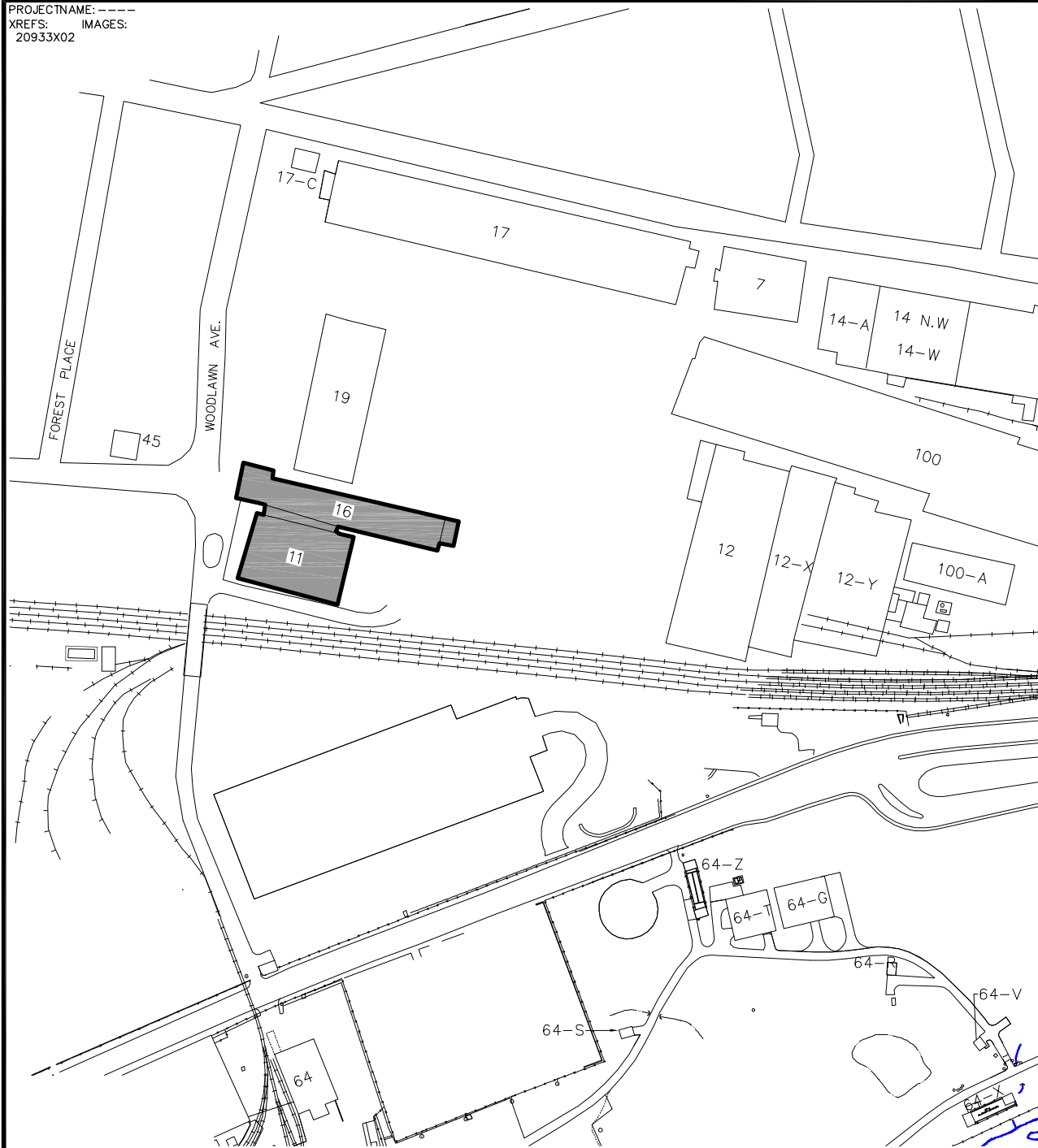
Parameter	Sample ID: Date Collected:	16-2-W2 01/16/07	16-2-W3 01/16/07	16-3-F1 01/18/07	16-3-W1 01/18/07	16-3-W3 01/18/07	16-4-F1 01/29/07	16-4-W2 01/17/07	16-4-W4 01/17/07	Arithmetic Average Concentration	MCP Method 1 S-1 GW-2/GW-3 Soil Standard (See Note 3)	Average Exceeds Method 1 Soil Standard?
<b>Semivolatile Organics</b>												
bis(2-Ethylhexyl)phthalate		1.00	0.14	<b>0.16</b>	<b>0.16</b>	0.210	<b>0.16</b>	0.11	0.530	2.01	200	No
<b>Inorganics</b>												
Arsenic		9.75	9.14	10.80	7.68	7.18	5.13	5.87	11.20	5.93	20	No
Chromium		16.60	12.50	15.60	12.70	12.20	7.79	8.66	347	26.06	30	No

**Notes:**

1. This table presents only those constituents that were detected in at least one building material sample which were retained following the comparison to screening criteria evaluation.
2. Non-detect sample results are included as one-half the detection limit in the calculation of arithmetic average concentrations and are presented in bold.
3. The Method 1 S-1 soil standards listed are those associated with GW-2 or GW-3 groundwater (whichever is more stringent).

**Figures**

PROJECTNAME: ----  
 XREFS: IMAGES:  
 20933X02

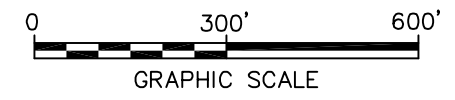


**LEGEND:**

 BUILDINGS SUBJECT TO DEMOLITION

**NOTES:**

1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1990; DATA PROVIDED BY GENERAL ELECTRIC COMPANY; AND BLASLAND, BOUCK & LEE, INC. (BBL) CONSTRUCTION PLANS; AND FROM SURVEY PROVIDED BY HILL ENGINEERS, ARCHITECTS, AND PLANNERS, DATED 6/5/01.
2. BUILDING NUMBER DESIGNATIONS ARE BASED ON A GE DRAWING TITLED, GROUND PLAN, SHEET 1, AND DATED JANUARY 1, 1994.
3. NOT ALL PHYSICAL FEATURES ARE SHOWN.
4. ALL LOCATIONS ARE APPROXIMATE.



GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**BUILDINGS 11 AND 16 CHARACTERIZATION  
 SAMPLING**

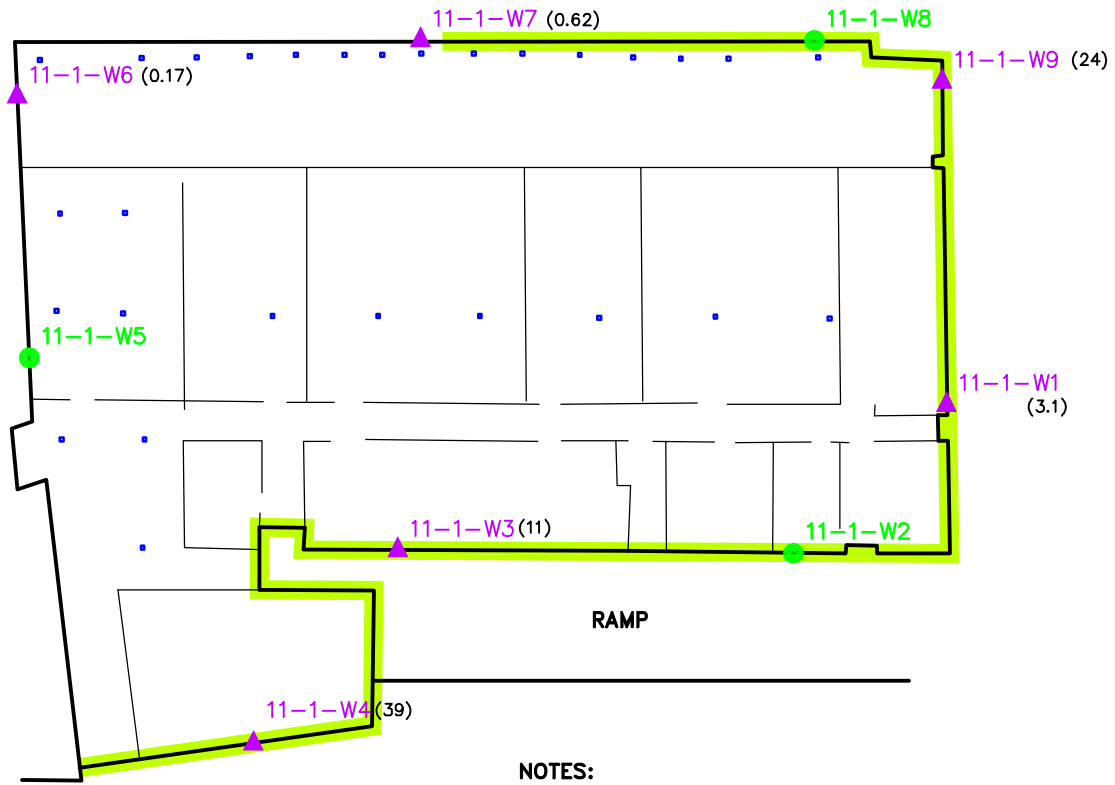
**BUILDINGS 11 AND 16  
 LOCATION PLAN**



FIGURE  
**1**



PROJECTNAME:-----  
 XREFS: IMAGES:



**LEGEND:**

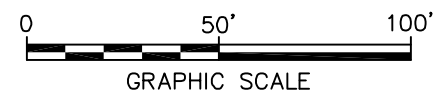
- COLUMNS
- ▲ 11-1-W1 PCB CORE SAMPLE LOCATION (RESULTS IN PPM)
- 11-1-W2 APPENDIX IX+3 CORE SAMPLE LOCATION
- █ MATERIALS SUBJECT TO SEGREGATION FOR DISPOSITION AT HILL 78 OPCA.


**SAMPLE ID KEY:**

11 (BUILDING) - 1 (FLOOR LEVEL) - W (WALL) - 1 (SAMPLE#)  
 F (FLOOR)

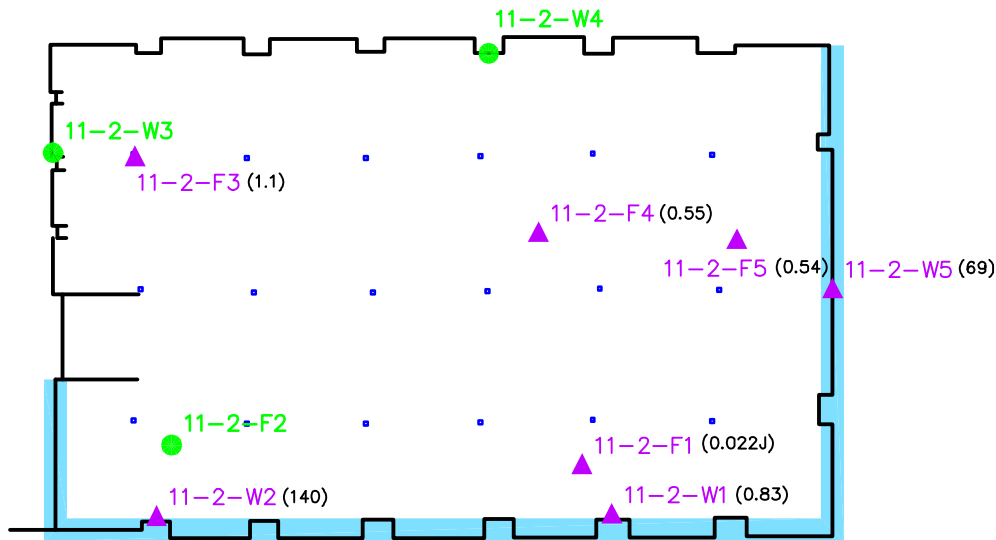
**NOTES:**

1. THE GENERAL LAYOUT FOR THIS FIGURE WAS OBTAINED FROM A SKETCH PREPARED BY THE GENERAL ELECTRIC COMPANY TITLED "FLOOR PLANS BLDG 11 FIRST FLOOR, DRAWING NO. K-9254411, SHEET 1."
2. SAMPLE LOCATIONS SHOWN CORRESPOND WITH SAMPLES COLLECTED DURING PRE-DEMOLITION CHARACTERIZATION ACTIVITIES ON JANUARY 24, 2007.
3. LOCATIONS ARE APPROXIMATE.
4. SAMPLE ID 11-1-W4 WAS COLLECTED FROM WITHIN THE AREA UNDERNEATH THE RAMP.
5. A COMPOSITE SAMPLE (11-TCLP-A-1) WAS COLLECTED FROM ALL SAMPLE LOCATIONS ON 1ST AND 2ND FLOORS OF BUILDING 11 FOR TCLP ANALYSES.



GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS <b>BUILDINGS 11 AND 16 CHARACTERIZATION SAMPLING</b>	
<b>BUILDING 11 - 1ST FLOOR - SAMPLE LOCATIONS</b>	
	FIGURE <b>2</b>

PROJECTNAME:-----  
 XREFS: IMAGES: Temp04388.Tif



**LEGEND:**

- COLUMNS
- ▲ 11-2-F1 PCB CORE SAMPLE LOCATION (RESULTS IN PPM)
- 11-2-F2 APPENDIX IX+3 CORE SAMPLE LOCATION
- MATERIALS SUBJECT TO SEGREGATION FOR OFF-SITE DISPOSITION AS TSCA

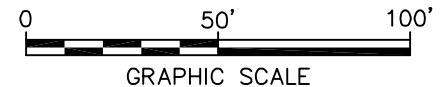


**SAMPLE ID KEY:**

11 (BUILDING) - 1 (FLOOR LEVEL) - W (WALL) - 1 (SAMPLE#)  
 F (FLOOR)

**NOTES:**

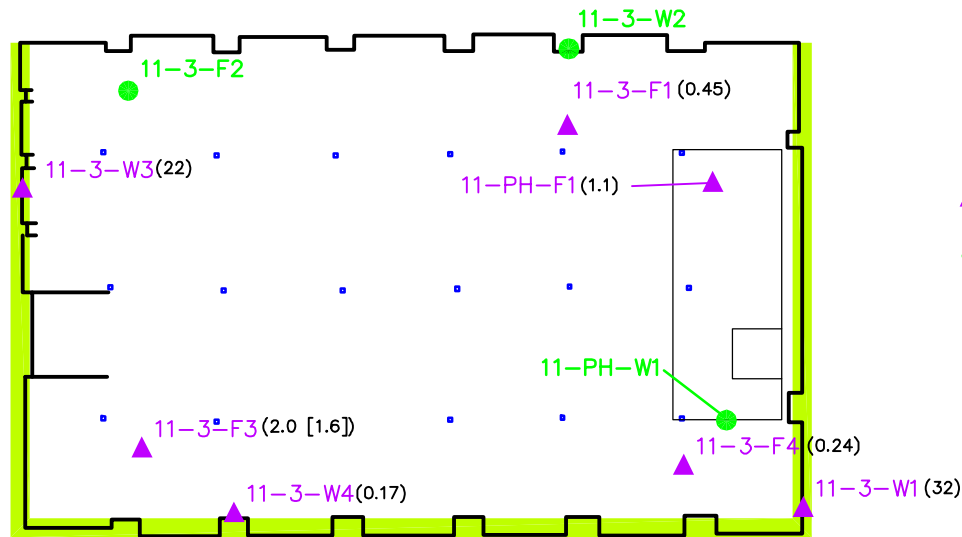
1. THE GENERAL LAYOUT FOR THIS FIGURE WAS OBTAINED FROM A SKETCH PREPARED BY THE GENERAL ELECTRIC COMPANY TITLED "FLOOR PLANS BLDG 11 SECOND FLOOR, DRAWING NO. K-9254411, SHEET 2."
2. SAMPLE LOCATIONS SHOWN CORRESPOND WITH SAMPLES COLLECTED DURING PRE-DEMOLITION CHARACTERIZATION ACTIVITIES ON JANUARY 23, 2007.
3. LOCATIONS ARE APPROXIMATE.
4. A COMPOSITE SAMPLE (11-TCLP-A-1) WAS COLLECTED FROM ALL SAMPLE LOCATIONS ON 1ST AND 2ND FLOORS OF BUILDING 11 FOR TCLP ANALYSES.



GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**BUILDINGS 11 AND 16 CHARACTERIZATION  
 SAMPLING**

**BUILDING 11 - 2ND FLOOR -  
 SAMPLE LOCATIONS**

PROJECTNAME:-----  
 XREFS: IMAGES:-----  
 Temp04388.Tif



**LEGEND:**

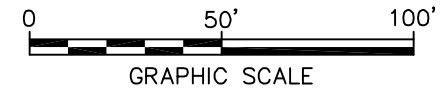
- COLUMNS
- ▲ 11-3-F1 PCB CORE SAMPLE LOCATION (RESULTS IN PPM)
- 11-3-F2 APPENDIX IX+3 CORE SAMPLE LOCATION
- MATERIALS SUBJECT TO SEGREGATION FOR DISPOSITION AT HILL 78 OPCA

**SAMPLE ID KEY:**

11 (BUILDING) - 1 (FLOOR LEVEL) - W (WALL) - 1 (SAMPLE#)  
 F (FLOOR)  
 PH (PENTHOUSE)

**NOTES:**

1. THE GENERAL LAYOUT FOR THESE FIGURES WERE OBTAINED FROM SKETCHES PREPARED BY THE GENERAL ELECTRIC COMPANY TITLED "FLOOR PLANS BLDG 11 THIRD FLOOR, DRAWING NO. K-9254411, SHEET 2." AND "FLOOR PLANS BLDG 11 PENTHOUSE FLOOR, DRAWING NO. K-9254411, SHEET4."
2. SAMPLE LOCATIONS SHOWN CORRESPOND WITH SAMPLES COLLECTED DURING PRE-DEMOLITION CHARACTERIZATION ACTIVITIES ON JANUARY 23, 2007.
3. LOCATIONS ARE APPROXIMATE.
4. A COMPOSITE SAMPLE (11-TCLP-A-2) WAS COLLECTED FROM ALL SAMPLE LOCATIONS ON 3RD FLOOR AND PENTHOUSE OF BUILDING 11 FOR TCLP ANALYSES.



GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**BUILDINGS 11 AND 16 CHARACTERIZATION  
 SAMPLING**

**BUILDING 11 - 3RD FLOOR & PENTHOUSE  
 SAMPLE LOCATIONS**

PROJECTNAME: ----  
 XREFS: IMAGES:  
 Temp04388.Tif

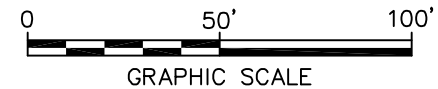
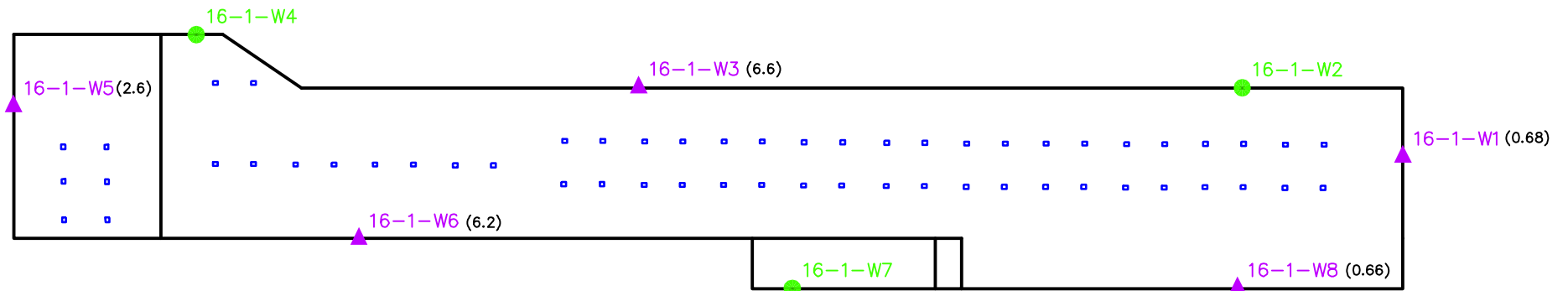
**LEGEND:**

- COLUMNS
- ▲ 16-1-W1  
PCB CORE SAMPLE LOCATION (RESULTS IN PPM)
- 16-W-W2  
APPENDIX IX+3 CORE SAMPLE LOCATION



**SAMPLE ID KEY:**

16(BUILDING) - 1 (FLOOR LEVEL) - W(WALL) - 1 (SAMPLE#)  
 F (FLOOR)



**NOTES:**

1. THE GENERAL LAYOUT FOR THIS FIGURE WAS OBTAINED FROM A SKETCH PREPARED BY THE GENERAL ELECTRIC COMPANY TITLED "FLOOR PLANS BLDG 16 1ST FLOOR, DRAWING NO. K-9254416, SHEET 1."
2. SAMPLE LOCATIONS SHOWN CORRESPOND WITH SAMPLES COLLECTED DURING PRE-DEMOLITION CHARACTERIZATION ACTIVITIES ON JANUARY 16, 2007.
3. LOCATIONS ARE APPROXIMATE.
4. A COMPOSITE SAMPLE (16-TCLP-A-1) WAS COLLECTED FROM ALL SAMPLE LOCATIONS ON 1ST AND 2ND FLOORS OF BUILDING 16 FOR TCLP ANALYSES.

GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**BUILDINGS 11 AND 16 CHARACTERIZATION  
 SAMPLING**

**BUILDING 16 - 1ST FLOOR -  
 SAMPLE LOCATIONS**



FIGURE  
**5**

PROJECTNAME:----  
 XREFS: IMAGES:  
 Temp04388.Tif

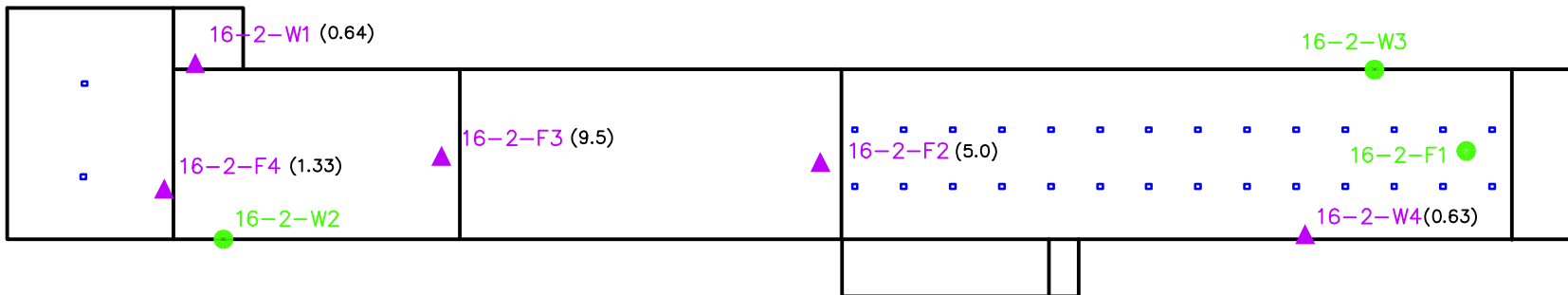
**LEGEND:**

- COLUMNS
- ▲ 16-3-F2  
PCB CORE SAMPLE LOCATION (RESULTS IN PPM)
- 16-2-F1  
APPENDIX IX+3 CORE SAMPLE LOCATION



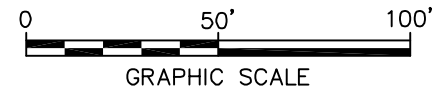
**SAMPLE ID KEY:**

16(BUILDING) - 1 (FLOOR LEVEL) - W (WALL) - 1 (SAMPLE#)  
 F (FLOOR)



**NOTE:**

1. THE GENERAL LAYOUT FOR THIS FIGURE WAS OBTAINED FROM A SKETCH PREPARED BY THE GENERAL ELECTRIC COMPANY TITLED "FLOOR PLANS BLDG 16 2ND FLOOR, DRAWING NO. K-9254416, SHEET 1."
2. SAMPLE LOCATIONS SHOWN CORRESPOND WITH SAMPLES COLLECTED DURING PRE-DEMOLITION CHARACTERIZATION ACTIVITIES ON JANUARY 16&17, 2007.
3. LOCATIONS ARE APPROXIMATE.
4. A COMPOSITE SAMPLE (16-TCLP-A-1) WAS COLLECTED FROM ALL SAMPLE LOCATIONS ON 1ST AND 2ND FLOORS OF BUILDING 16 FOR TCLP ANALYSES.



GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS <b>BUILDINGS 11 AND 16 CHARACTERIZATION                  SAMPLING</b>	
<b>BUILDING 16 - 2ND FLOOR -                  SAMPLE LOCATIONS</b>	
	FIGURE <b>6</b>

PROJECTNAME:----  
 XREFS: IMAGES:

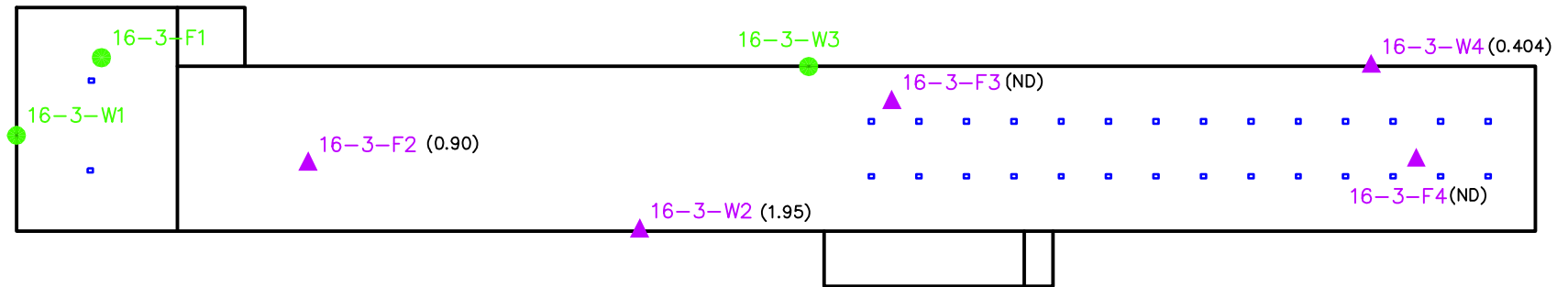
**LEGEND:**

- COLUMNS
- ▲ 16-3-F2 PCB CORE SAMPLE LOCATION (RESULTS IN PPM)
- 16-3-W1 APPENDIX IX+3 CORE SAMPLE LOCATION



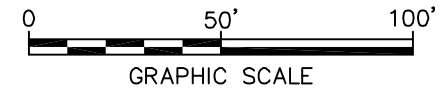
**SAMPLE ID KEY:**

16(BUILDING) - 1 (FLOOR LEVEL) - W (WALL) - 1 (SAMPLE#)  
 F (FLOOR)



**NOTES:**

1. THE GENERAL LAYOUT FOR THIS FIGURE WAS OBTAINED FROM A SKETCH PREPARED BY THE GENERAL ELECTRIC COMPANY TITLED "FLOOR PLANS BLDG 16 3RD FLOOR, DRAWING NO. K-9254416, SHEET 1."
2. SAMPLE LOCATIONS SHOWN CORRESPOND WITH SAMPLES COLLECTED DURING PRE-DEMOLITION CHARACTERIZATION ACTIVITIES ON JANUARY 18, 2007.
3. LOCATIONS ARE APPROXIMATE.
4. ND = NOT DETECTED.
5. A COMPOSITE SAMPLE (16-TCLP-B-1) WAS COLLECTED FROM ALL SAMPLE LOCATIONS ON 3RD, 4TH, AND 5TH FLOORS OF BUILDING 16 FOR TCLP ANALYSES.



GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**BUILDINGS 11 AND 16 CHARACTERIZATION  
 SAMPLING**

**BUILDING 16 - 3RD FLOOR  
 SAMPLE LOCATIONS**



FIGURE  
**7**

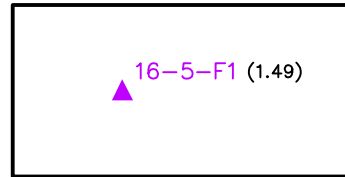
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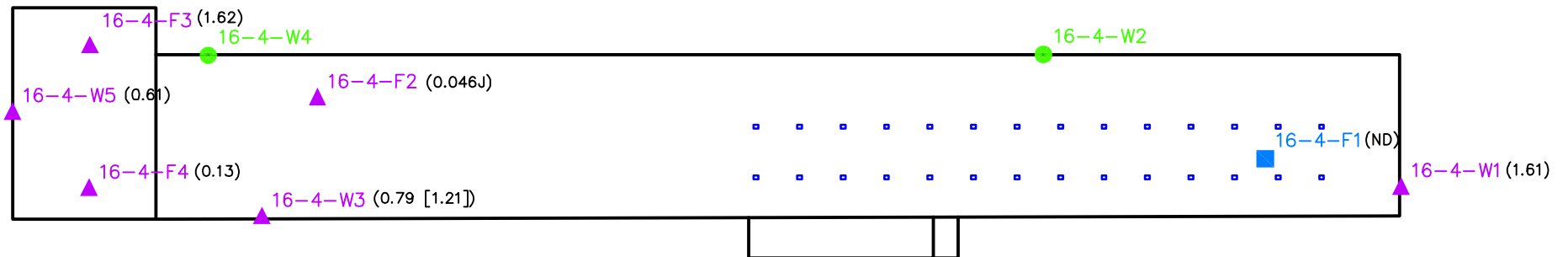
- COLUMNS
- 16-4-F1  
PCB/APPENDIX IX+3 CORE SAMPLE LOCATION (PCB RESULTS IN PPM)
- ▲ 16-4-F1  
PCB CORE SAMPLE LOCATION (RESULTS IN PPM)
- 16-4-32  
APPENDIX IX+3 CORE SAMPLE LOCATION

**SAMPLE ID KEY:**

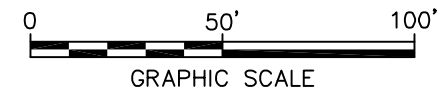
11 (BUILDING) - 1 (FLOOR LEVEL) - W (WALL) - 1 (SAMPLE#)  
 F (FLOOR)



**5TH FLOOR**



**4TH FLOOR**



**NOTES:**

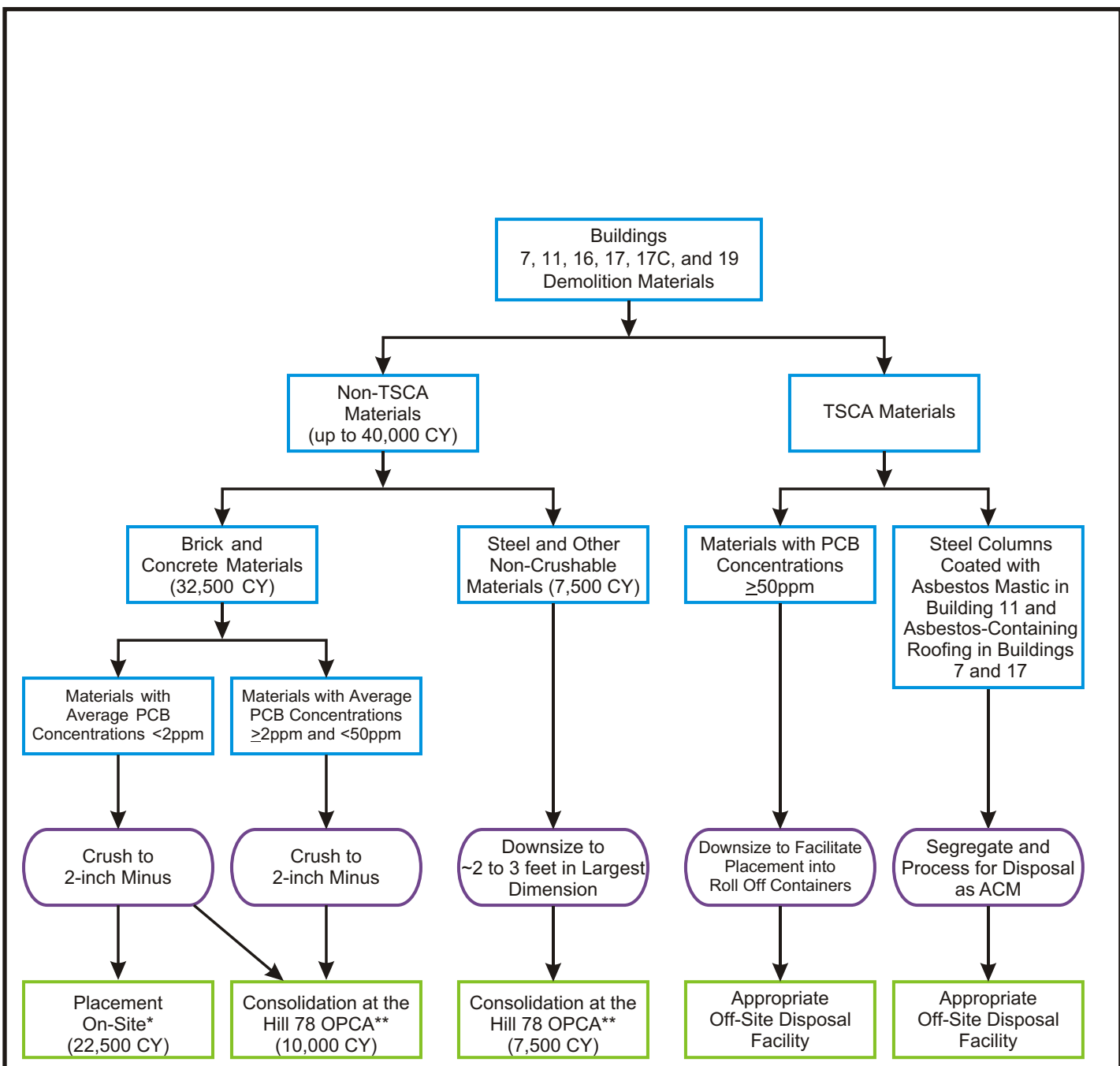
1. THE GENERAL LAYOUT FOR THIS FIGURE WAS OBTAINED FROM A SKETCH PREPARED BY THE GENERAL ELECTRIC COMPANY TITLED "FLOOR PLANS BLDG 16 4TH, & 5TH FLOOR, DRAWING NO. K-9254416, SHEET 1."
2. SAMPLE LOCATIONS SHOWN CORRESPOND WITH SAMPLES COLLECTED DURING PRE-DEMOLITION CHARACTERIZATION ACTIVITIES ON JANUARY 17, 2007.
3. LOCATIONS ARE APPROXIMATE.
4. ND = NOT DETECTED.
5. A COMPOSITE SAMPLE (16-TCLP-B-1) WAS COLLECTED FROM ALL SAMPLE LOCATIONS ON 3RD, 4TH, AND 5TH FLOORS OF BUILDING 16 FOR TCLP ANALYSES.

GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**BUILDINGS 11 AND 16 CHARACTERIZATION  
 SAMPLING**

**BUILDING 16 - 4TH & 5TH FLOOR -  
 SAMPLE LOCATIONS**



FIGURE  
**8**



**Legend:**

- = Material Segregation
- = Material Processing
- = Disposition Location

**Notes:**


- \* In the event that regulatory approval to place materials on-site is not obtained, this material will be transported to the Hill 78 OPCA for consolidation.
- \*\* In the event that the Hill 78 OPCA reaches full capacity, these materials will be transported to an appropriate off-site disposal facility.

GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
**BUILDINGS 11 AND 16**  
**CHARACTERIZATION SAMPLING**

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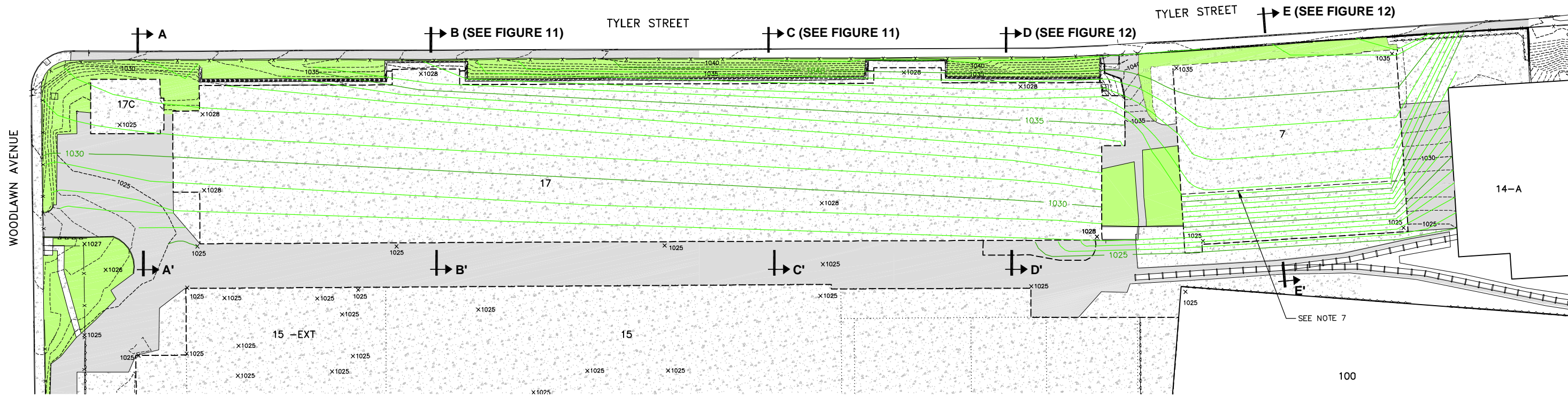
**MATERIAL SEGREGATION AND  
DISPOSITION FLOW CHART**

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**FIGURE**  
**9**



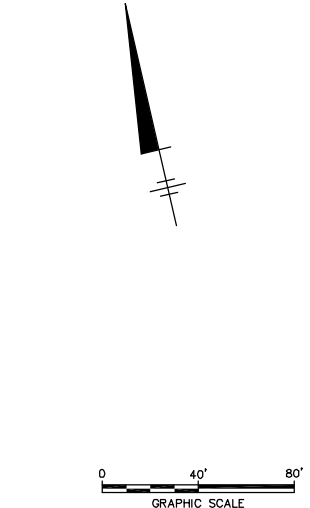
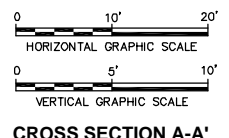
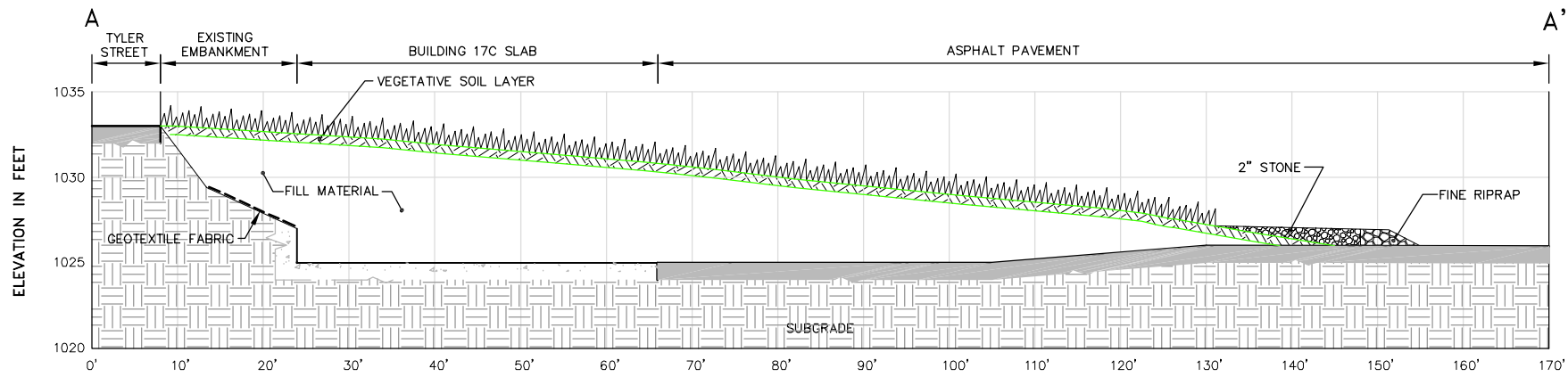
SYR-85-LAF LIP RLP LAYER: ONE\*, OFF=REF\* G:\CAD\GE-CAD\GE\_ACTIVE\N\20933001\RESTORE\BROWN\20933626.DWG SAVER:10/26/2007 4:09 PM LAYOUT:10 PAGESETUP:----- PENTABLE:PLT\FULL.CTB PRINTED:10/26/2007 4:32 PM BY:REPETRE DEVICE:PDF CONVERTER



**ESTIMATED VOLUME = 15,000 CY**

- LEGEND:**
- BUILDING
  - FORMER BUILDING LOCATION
  - 15** BUILDING ID
  - 1035 PROPOSED ELEVATION CONTOUR (SEE NOTE 7)
  - 1020 INDEX ELEVATION CONTOUR (5 FOOT CONTOURS IN BOLD)
  - X1027 SPOT ELEVATION
  - ASPHALT
  - CONCRETE
  - GRASS

- NOTES:**
- BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05. ADDITIONAL TOPOGRAPHIC INFORMATION OBTAINED FROM SURVEY BY BERKSHIRE ENGINEERING DATED 7/1/06.
  - NOT ALL PHYSICAL FEATURES SHOWN.
  - EXISTING CONTOUR INTERVAL IS ONE FOOT.
  - LOCATIONS AND DIMENSIONS SHOWN ON CROSS SECTIONS ARE APPROXIMATE.
  - BELOW GRADE DEPTHS OF ASPHALT, CONCRETE WALLS, AND CONCRETE SLABS ARE INFERRED (NO SURVEY DATA AVAILABLE TO CONFIRM).
  - SPOT ELEVATIONS SHOWN ON BUILDINGS 7, 17, AND 17C SLABS ARE APPROXIMATE (NOT BASED ON SURVEY DATA).
  - BUILDING 7 CONSISTS OF AN UPPER LEVEL THAT IS GENERALLY ELEVATED ABOVE THE SURROUNDING PAVEMENT/ALLEYWAY ALONG THE SOUTH AND EAST SIDES. THERE IS ALSO A LOWER LEVEL SLAB THAT IS GENERALLY AT GRADE WITH THE SURROUNDING PAVEMENT/ALLEYWAY.
  - FINAL ELEVATIONS SHOWN INCLUDE PLACEMENT OF A 12-INCH VEGETATIVE SOIL LAYER.



**CONCEPTUAL NOT FOR CONSTRUCTION**

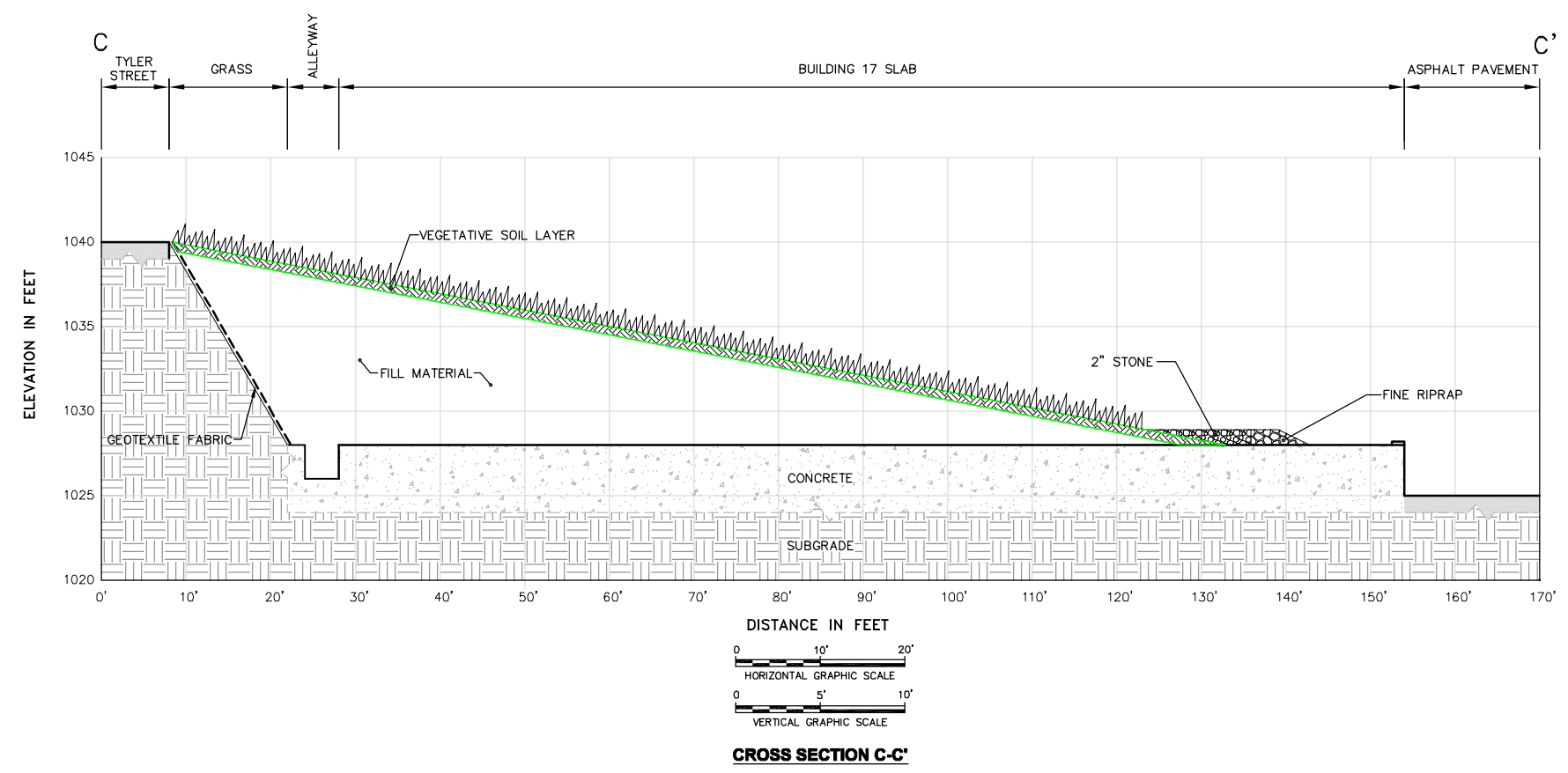
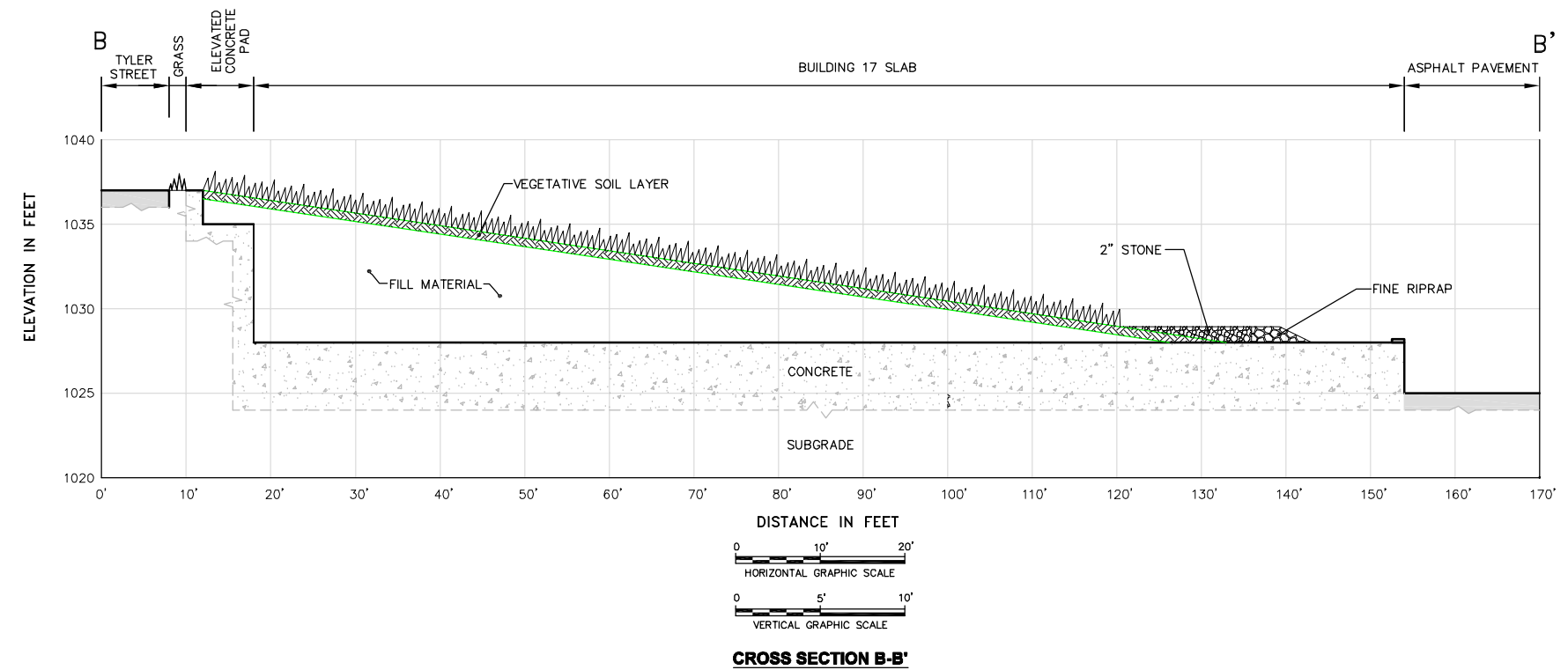
GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
**BROWNFIELDS PROGRAM**

**EXTENSION OF TYLER STREET  
EMBANKMENT ALONG THE NORTHERN  
FACE OF BUILDINGS 7, 17, & 17C**

**ARCADIS BBL**  
*infrastructure, environment, facilities*

FIGURE  
**10**

SYR-85-LAF LIP RLP LAYER: ONE\*, OFF=REF\*  
 G: CAD\GE-CAD\GE\_ACTIVE\N\20933001\RESTORE\BROWN\20933624.DWG  
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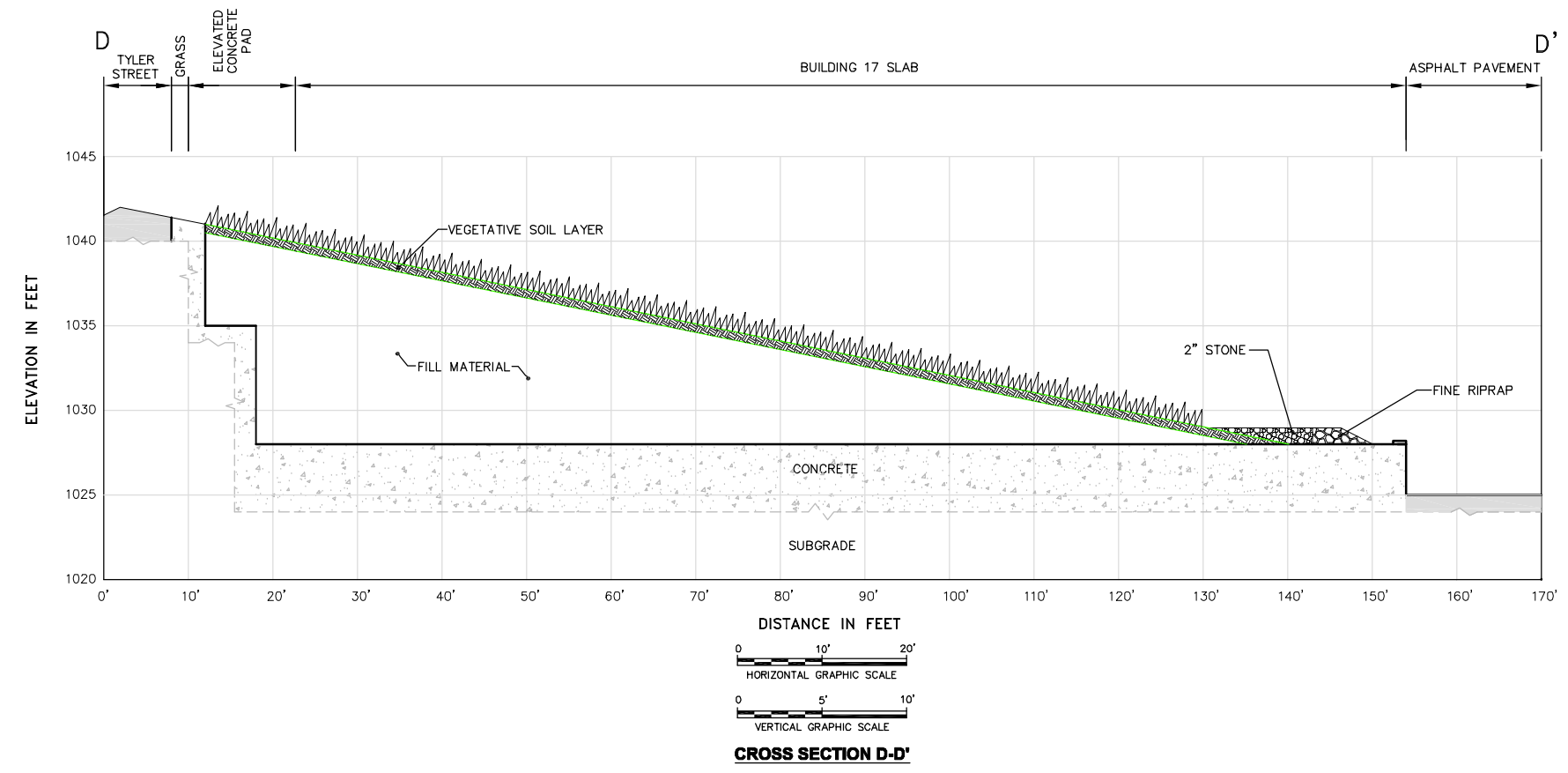
- NOTES:**
1. LOCATIONS AND DIMENSIONS SHOWN ON CROSS SECTIONS ARE APPROXIMATE.
  2. BELOW GRADE DEPTHS OF ASPHALT, CONCRETE WALLS, AND CONCRETE SLABS ARE INFERRED (NO SURVEY DATA AVAILABLE TO CONFIRM).
  3. SPOT ELEVATIONS SHOWN ON BUILDING 17 AND BUILDING 17C SLABS ARE APPROXIMATE (NOT BASED ON SURVEY DATA).

**CONCEPTUAL  
NOT FOR CONSTRUCTION**

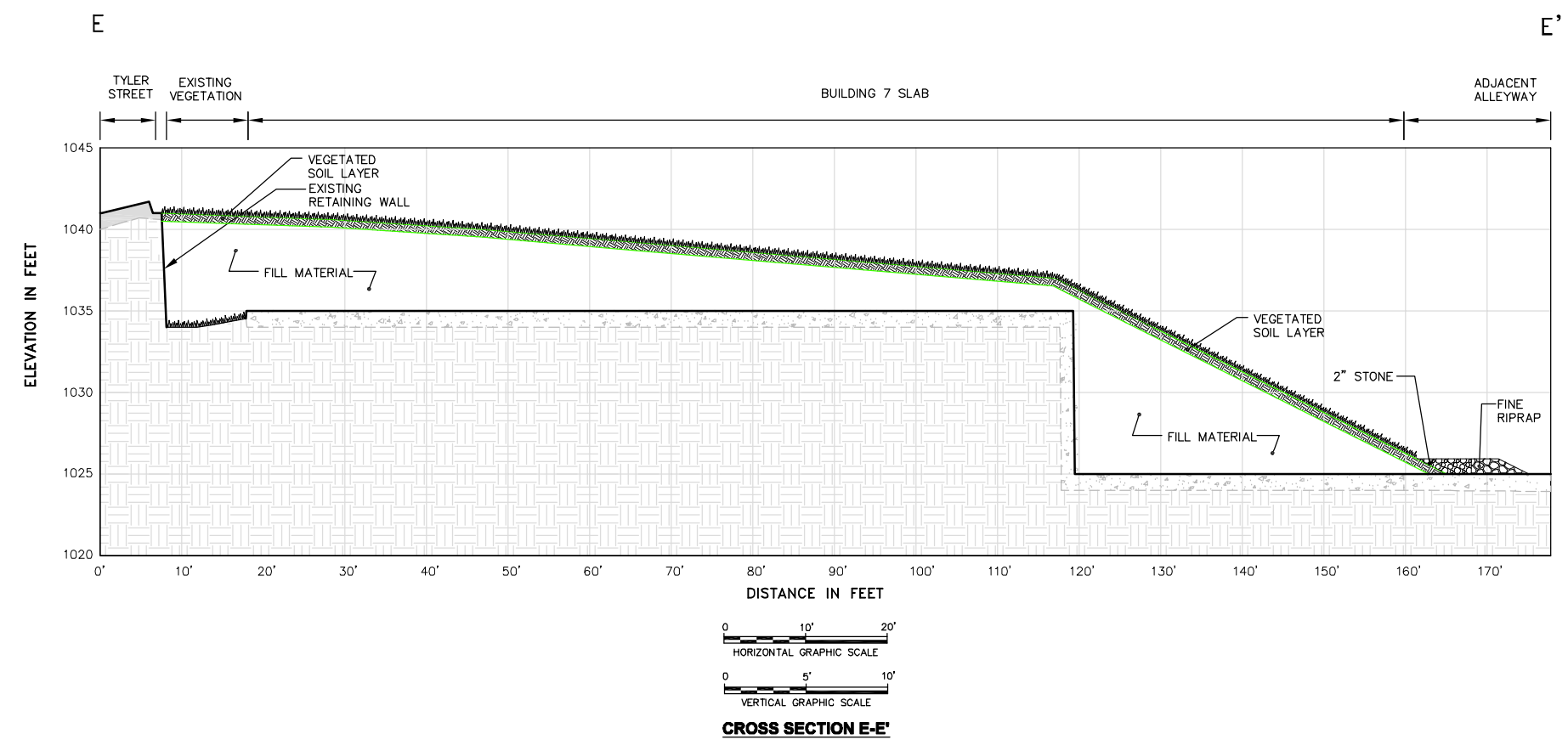
GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**BROWNFIELDS PROGRAM**  
**EXTENSION OF TYLER STREET EMBANKMENT  
 ALONG THE NORTHERN FACE OF BUILDINGS 7,  
 17, & 17C CROSS SECTION**



SYR-85-LAF LIP RLP LAYER: ONE\*, OFF=REF\*  
 G: CAD\GE-CAD\GE\_ACTIVE\N\20933001\RESTORE\BROWN\20933625.DWG  
 PROJECT NAME: 20933000  
 PENTABLE:FULL.CTB PRINTED:10/26/2007 4:30 PM BY:REPETRIE  
 LAYOUT:12 PAGESETUP:-----  
 SAVED:10/26/2007 4:29 PM



- NOTES:**
1. LOCATIONS AND DIMENSIONS SHOWN ON CROSS SECTIONS ARE APPROXIMATE.
  2. BELOW GRADE DEPTHS OF ASPHALT, CONCRETE WALLS, AND CONCRETE SLABS ARE INFERRED (NO SURVEY DATA AVAILABLE TO CONFIRM).
  3. SPOT ELEVATIONS SHOWN ON BUILDING 17 AND BUILDING 17C SLABS ARE APPROXIMATE (NOT BASED ON SURVEY DATA).



**CONCEPTUAL  
NOT FOR CONSTRUCTION**

GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**BROWNFIELDS PROGRAM**  
**EXTENSION OF TYLER STREET EMBANKMENT  
 ALONG THE NORTHERN FACE OF BUILDINGS 7,  
 17, & 17C CROSS SECTION**



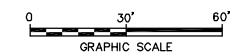
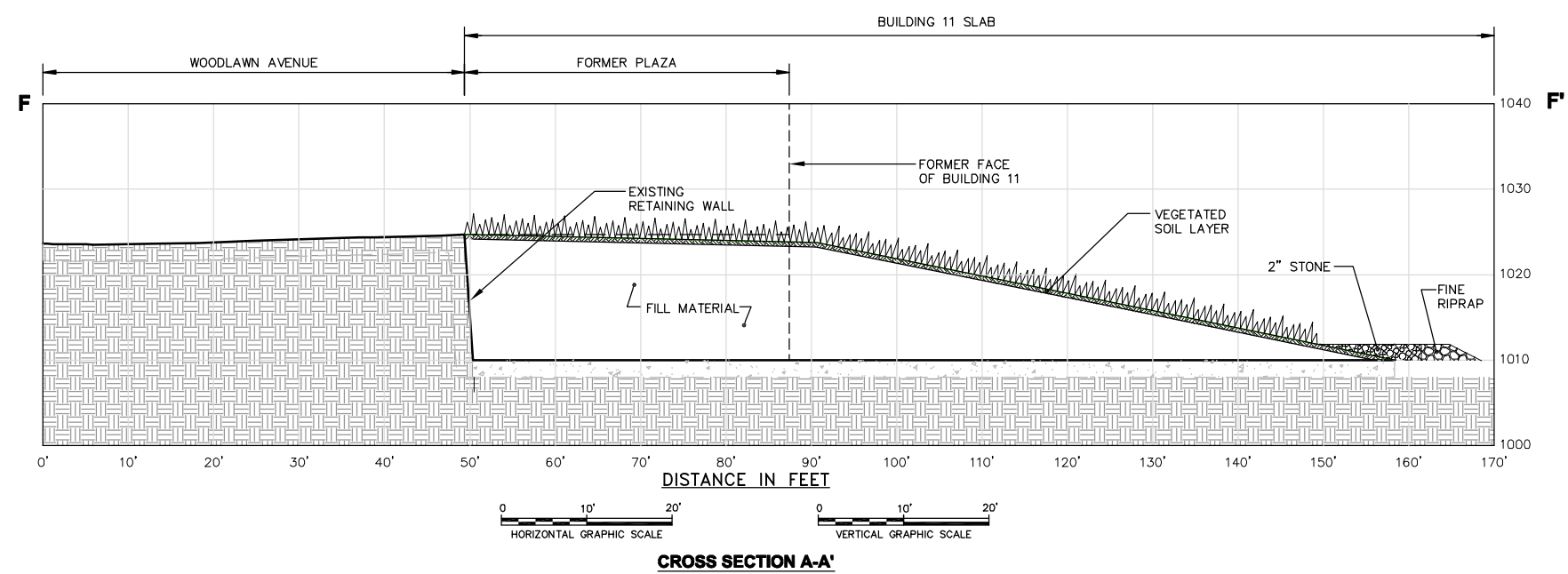
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 PROJECT NAME: IMAGES:  
 20833X00  
 20833X07  
 20833X11



- LEGEND:**
- PROPOSED CONTOUR
  - X1011 SPOT ELEVATION
  - - - - -1011- - - - - INDEX ELEVATION CONTOUR (5-FOOT CONTOURS IN BOLD)
  - [---] FORMER BUILDING/STRUCTURE LOCATION
  - [Grey] ASPHALT
  - [Stippled] CONCRETE
  - [Brick pattern] BRICK
  - [Green] GRASS
  - [Gravel pattern] GRAVEL

- NOTES:**
- BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
  - NOT ALL PHYSICAL FEATURES SHOWN.
  - EXISTING CONTOUR INTERVAL IS ONE FOOT.
  - SPOT ELEVATION OF POST-DEMOLITION SLAB-ON-GRADE IS INFERRED BASED ON SURROUNDING TOPOGRAPHIC SURVEY DATA.
  - LOCATIONS AND DIMENSIONS SHOWN ON CROSS SECTION ARE APPROXIMATE.
  - BELOW-GRADE DEPTHS OF CONCRETE WALLS AND CONCRETE SLABS ARE INFERRED (NO SURVEY DATA AVAILABLE TO CONFIRM).
  - FINAL ELEVATIONS SHOWN INCLUDE PLACEMENT OF A 12-INCH VEGETATIVE SOIL LAYER.

**ESTIMATED VOLUME = 6,700 CY**



**CONCEPTUAL  
NOT FOR CONSTRUCTION**

GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**BROWNFIELDS PROGRAM**  
  
**NEW EMBANKMENT ALONG  
 WOODLAWN AVENUE RETAINING WALL**





**LEGEND:**

— — — = APPROXIMATE LOCATION OF  
POTENTIAL LANDSCAPING BERM

CONCEPTUAL  
NOT FOR CONSTRUCTION

GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
**BROWNFIELDS PROGRAM**

**APPROXIMATE LOCATION OF  
POTENTIAL LANDSCAPING BERM**



FIGURE  
**14**

[S:\R-85-DMW LEAD] S:\R-85-DMW KFS LIP LAYER: ON=\*, OFF=REF, FRZ\*  
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 PROJECT NAME: IMAGES:  
 20933X05  
 20933X77  
 20933X00



CONCEPTUAL  
NOT FOR CONSTRUCTION

**NOTES:**

1. THE BASE MAP WAS PREPARED FROM A SURVEY PREPARED BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, DRAWING NO. GE-1081-1, DATED 3/24/04.
2. THIS GRADING PLAN IS BASED ON THE ASSUMPTION THAT THE CITY WILL MODIFY THE EXISTING ALIGNMENT/CONFIGURATION OF EAST STREET. THIS GRADING PLAN ASSUMES THAT FUTURE ROAD REALIGNMENT ACTIVITIES WILL ENCROACH UPON EXISTING GE PROPERTY, AND AS SUCH, AN APPROXIMATE 20-FOOT BUFFER HAS BEEN ALLOTTED BETWEEN THE EXISTING NORTHERN PROPERTY BOUNDARY ALONG EAST STREET AND THE NORTHERN EDGE/TOE OF THE POTENTIAL LANDSCAPING BERM.

**LEGEND:**

- |                     |   |             |   |
|---------------------|---|-------------|---|
| ●                   | APPROXIMATE LOCATION OF POTENTIAL PFITZER JUNIPER | ▭ (grey)    | PAVED AREA (ASPHALT/CONCRETE)                               |
| — (green)           | POTENTIAL CONTOUR                                 | ▭ (green)   | GRASS AREA  |
| - - - (black)       | PROPERTY LINE                                     | ▭ (brown)   | GRAVEL/DIRT/BROKEN PAVEMENT AREA                            |
| - · - · (black)     | EASEMENT LINE                                     | — (dotted)  | EXISTING INDEX ELEVATION CONTOUR                            |
| — (blue)            | EDGE OF WATER                                     | — (dashed)  | EXISTING ELEVATION CONTOUR                                  |
| - x - x - x (black) | FENCE   | — (red)     | APPROXIMATE LIMITS OF 100-YEAR FLOODPLAIN BOUNDARY          |
|                     |   | ▭ (hatched) | APPROXIMATE AREA OF NEW PAVEMENT FOR ACCESS ROAD RELOCATION |

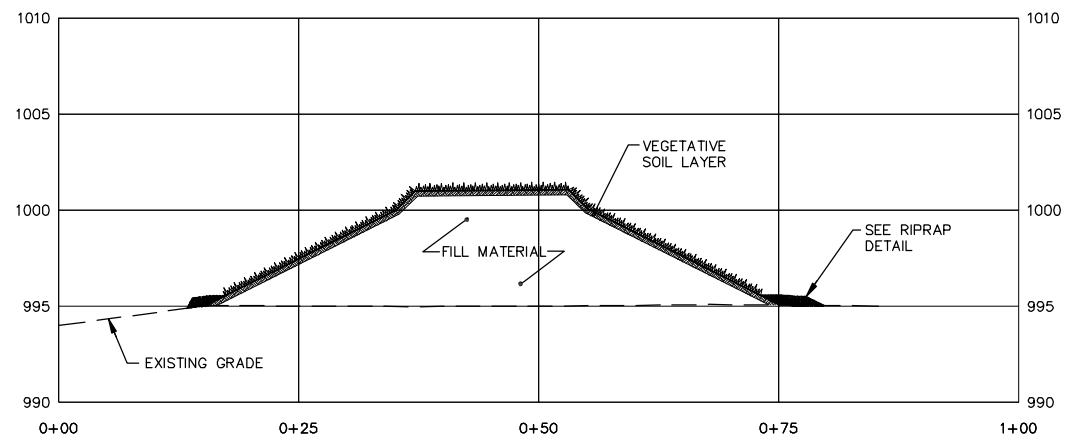
GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
**BROWNFIELDS PROGRAM**

**POTENTIAL LANDSCAPING BERM  
CONCEPTUAL GRADING PLAN**

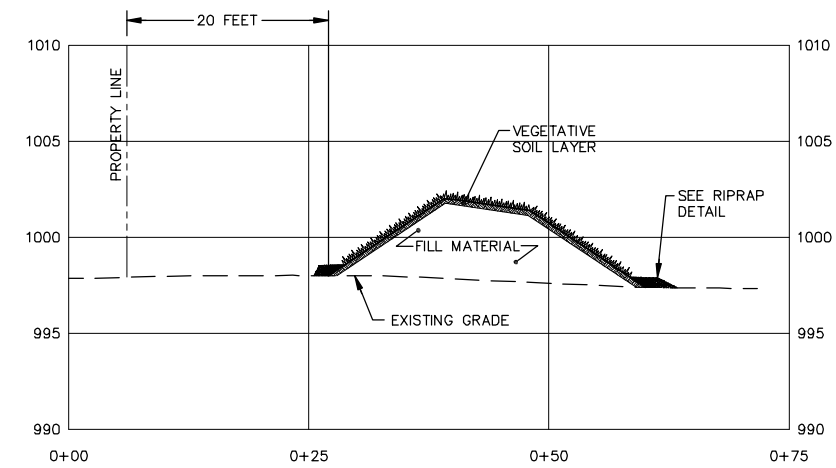
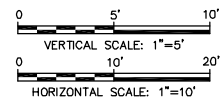


FIGURE

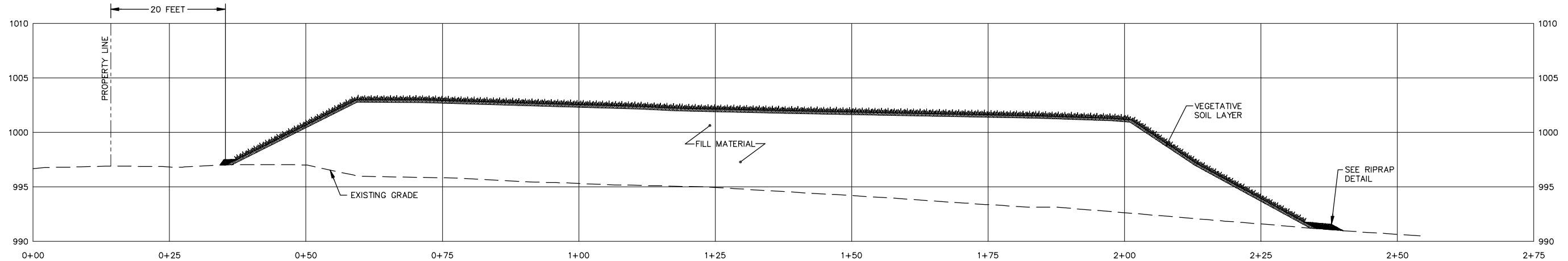
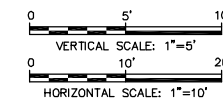
**15**



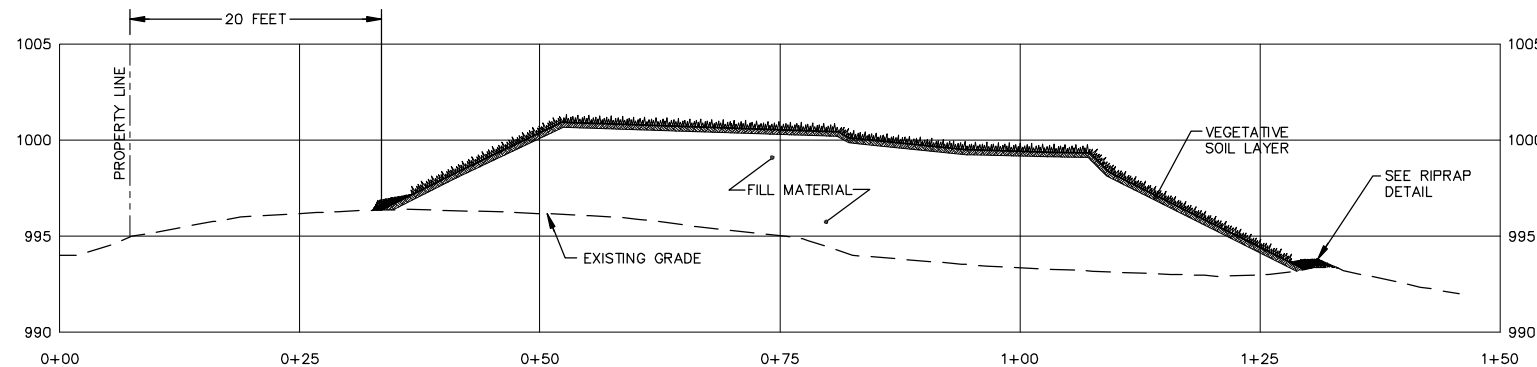
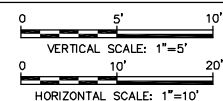
**CROSS SECTION A-A'**



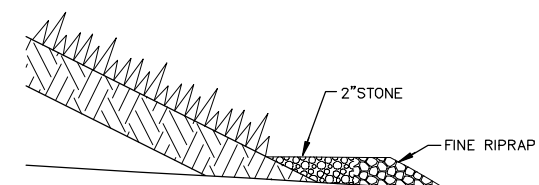
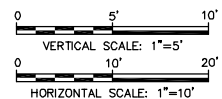
**CROSS SECTION B-B'**



**CROSS SECTION C-C'**



**CROSS SECTION D-D'**



**RIPRAP DETAIL**  
NOT TO SCALE

**CONCEPTUAL  
NOT FOR CONSTRUCTION**

GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
**BROWNFIELDS PROGRAM**

**POTENTIAL LANDSCAPING BERM  
CROSS SECTIONS**



FIGURE

**16**

[SYR-85-DMW LEAD] SYR-85-DMW LIP KFS LAYER: ON\*, OFF=REF, FRZ\*  
G:\CAD\GE-CAD\GE\_ACTIVE\N\20933001\RESTORE\BROWN\2093301.DWG. SAVED:10/24/2007 10:23 AM LAYOUT:16 PAGES:16 PAGESETUP:----- PENTABLE:PLTFULL.CTB PRINTED:10/25/2007 2:32 PM BY:RPETRIE  
PROJECT NAME: 20933000 IMAGES:

**Attachment 1**

Data Validation Report



**Attachment 1  
Building Material Sampling Data Validation Report  
Building 11 & 16 Characterization Sampling**

**General Electric Company  
Pittsfield, Massachusetts**

**1.0 General**

This attachment summarizes the Tier I and Tier II data reviews performed for building material samples collected during investigation activities conducted at Building 11 and 16, located at the General Electric Company/Housatonic River Site in Pittsfield, Massachusetts. The samples were analyzed for polychlorinated biphenyls (PCBs) and/or various other constituents listed in Appendix IX of 40 CFR Part 264, plus three additional constituents -- benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine (hereafter referred to as Appendix IX+3) by SGS Environmental Services, Inc. (formerly Paradigm Analytical Labs, Inc.) of Wilmington, North Carolina. Data validation was performed for 47 PCB samples, 25 volatile organic compound (VOC) samples, 25 semi-volatile organic compound (SVOC) samples, and 25 metal samples.

**2.0 Data Evaluation Procedures**

This attachment outlines the applicable quality control criteria utilized during the data review process and any deviations from those criteria. The data review was conducted in accordance with the following documents:

- *Field Sampling Plan/Quality Assurance Project Plan, General Electric Company, Pittsfield, Massachusetts*, Blasland, Bouck & Lee, Inc. (BBL; FSP/QAPP, approved May 25, 2004 and resubmitted June 15, 2004);
- *Region I Tiered Organic and Inorganic Data Validation Guidelines*, USEPA Region I (July 1, 1993);
- *Region I Laboratory Data Validation Functional Guidelines for Evaluating Inorganics Analyses*, USEPA Region I (June 13, 1988) (Modified February 1989);
- *Region I Laboratory Data Validation Functional Guidelines for Evaluating Organics Analyses*, USEPA Region I (February 1, 1988) (Modified November 1, 1988); and
- *Region I Laboratory Data Validation Functional Guidelines for Evaluating Organics Analyses*, USEPA Region I (Draft, December 1996).

A tabulated summary of the Tier I and Tier II data evaluations is presented in Table 3-1. Each sample subjected to evaluation is listed in Table 3-1 to document that data review was performed, as well as present the highest level of data validation (Tier I or Tier II) that was applied. Samples that required data qualification are listed separately for each parameter (compound or analyte) that required qualification.

The following data qualifiers were used in this data evaluation:

- J The compound was positively identified, but the associated numerical value is an estimated concentration. This qualifier is used when the data evaluation procedure identifies a deficiency

in the data generation process. This qualifier is also used when a compound is detected at an estimated concentration less than the corresponding practical quantitation limit (PQL).

- U The compound was analyzed for, but was not detected. The sample quantitation limit is presented and adjusted for dilution and (for solid samples only) percent moisture. Non-detect sample results are presented as ND(PQL) within this report and in Table 3-1 for consistency with documents previously prepared for investigations conducted at this site.
- UU The compound was not detected above the reported sample quantitation limit. However, the reported limit is estimated and may or may not represent the actual level of quantitation. Non-detect sample results that required qualification are presented as ND(PQL) J within this report and in Table 3-1 for consistency with documents previously prepared for this investigation.
- R Indicates that the previously reported detection limit or sample result has been rejected due to a major deficiency in the data generation procedure. The data should not be used for any qualitative or quantitative purpose.

### **3.0 Data Validation Procedures**

The FSP/QAPP provides (in Section 7.5) that all analytical data will be validated to a Tier I level following the procedures presented in the *Region I Tiered Organic and Inorganic Data Validation Guidelines* (USEPA guidelines). Accordingly, 100% of the analytical data for these investigations were subjected to Tier I review. The Tier I review consisted of a completeness evidence audit, as outlined in the *USEPA Region I CSF Completeness Evidence Audit Program* (USEPA Region I, 7/31/91), to ensure that all laboratory data and documentation were present. In the event data packages were determined to be incomplete, the missing information was requested from the laboratory. Upon completion of the Tier I review, the data packages complied with the USEPA Region I Tier I data completeness requirements.

**Summary of Samples Subjected to Tier I and Tier II Data Validation**

Parameter	Tier I Only			Tier I & Tier II			Total
	Samples	Duplicates	Blanks	Samples	Duplicates	Blanks	
PCBs	0	0	0	43	2	2	47
VOCs	0	0	0	21	2	2	25
SVOCs	0	0	0	21	2	2	25
Inorganics	0	0	0	21	2	2	25
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>106</b>	<b>8</b>	<b>8</b>	<b>122</b>

A Tier II review was performed to resolve data usability limitations identified from laboratory qualification of the data. The Tier II data review consisted of a review of all data package summary forms for identification of quality assurance/quality control (QA/QC) deviations and qualification of the data according to the Region I Data Validation Functional Guidelines. The Tier II review resulted in the qualification of data for several samples due to minor QA/QC deficiencies. Additionally, all field duplicates were examined for relative percent difference (RPD) compliance with the criteria specified in the FSP/QAPP. A tabulated summary of the samples subjected to Tier I and Tier II data evaluations is presented in the following table.

When qualification of the sample data was required, the sample results associated with a QA/QC parameter deviation were qualified in accordance with the procedures outlined in USEPA Region I data validation guidance documents. When the data validation process identified several quality control deficiencies, the cumulative effect of the various deficiencies was employed in assigning the final data qualifier. A summary of the QA/QC parameter deviations that resulted in data qualification is presented below for each analytical method.

#### **4.0 Data Review**

The initial calibration criterion for organic analyses requires that the average relative response factor (RRF) has a value greater than 0.05. Sample results were qualified as estimated (J) when this criterion was not met. The compounds that did not meet the initial calibration criterion and the number of samples qualified are presented in the following table.

**Compounds Qualified Due to Initial Calibration Deviations (RRF)**

<b>Analysis</b>	<b>Compound</b>	<b>Number of Affected Samples</b>	<b>Qualification</b>
VOCs	1,2-Dibromo-3-chloropropane	1	J
	1,4-Dioxane	24	J
	2-Chloroethylvinylether	24	J
	Acetone	1	J
	Acetonitrile	24	J
	Acrolein	24	J
	Acrylonitrile	1	J
	Isobutanol	23	J
	Methyl Methacrylate	1	J
	Propionitrile	24	J
SVOCs	4-Phenylenediamine	25	J
	a,a'-Dimethylphenethylamine	25	J
	Aramite	25	J
	Benzidine	25	J

The continuing calibration criterion for VOCs and SVOCs requires that the continuing calibration RRF have a value greater than 0.05. Sample data for detect and non-detect compounds with RRF values less than 0.05 were qualified as estimated (J). The compounds that exceeded continuing calibration criterion and the number of samples qualified due to those exceedences are presented in the following table.

**Compounds Qualified Due to Continuing Calibration Deviations (RRF)**

<b>Analysis</b>	<b>Compound</b>	<b>Number of Affected Samples</b>	<b>Qualification</b>
VOCs	Chloroethane	8	J
SVOCs	4-Nitroquinoline-1-oxide	7	J

### Compounds Qualified Due to Continuing Calibration Deviations (RRF)

Analysis	Compound	Number of Affected Samples	Qualification
	Benzo(g,h,i)perylene	6	J
	Dibenzo(a,h)anthracene	6	J
	Hexachlorophene	1	J

Several of the organic compounds (including the compounds presented in the above tables detailing RRF deviations) exhibit instrument response factors (RFs) below the USEPA Region I minimum value of 0.05, but meet the analytical method criterion, which does not specify minimum RFs for these compounds. These compounds were analyzed by the laboratory at a higher concentration than the compounds that normally exhibit RFs greater than the USEPA Region I minimum value of 0.05 in an effort to demonstrate acceptable response. USEPA Region I guidelines state that non-detect compound results associated with a RF less than the minimum value of 0.05 are to be rejected (R). However, in the case of these select organic compounds, the RF is an inherent problem with the current analytical methodology; therefore, the non-detect sample results were qualified as estimated (J).

The continuing calibration criterion requires that the percent difference (%D) between the initial calibration RRF and the continuing calibration RRF for VOCs and SVOCs be less than 25%. Sample data for detect and non-detect compounds with %D values that exceeded the continuing calibration criteria were qualified as estimated (J). A summary of the compounds that exceeded the continuing calibration criterion and the number of samples qualified due to those deviations are presented in the following table.

### Compounds Qualified Due to Continuing Calibration of %D Values

Analysis	Compound	Number of Affected Samples	Qualification
VOCs	1,2,3-Trichloropropane	2	J
	1,2-Dichloroethane	7	J
	2-Butanone	18	J
	2-Hexanone	9	J
	4-Methyl-2-pentanone	12	J
	Acetone	20	J
	Acrolein	20	J
	Acrylonitrile	7	J
	Bromomethane	8	J
	Chloroethane	8	J
	Chloromethane	8	J
	Dibromomethane	3	J
	Dichlorodifluoromethane	8	J
	Methylene Chloride	21	J
	Trichlorofluoromethane	8	J
SVOCs	3&4-Methylphenol	3	J
	4-Nitroquinoline-1-oxide	11	J
	a,a'-Dimethylphenethylamine	6	J
	Aramite	1	J
	Benzidine	12	J

**Compounds Qualified Due to Continuing Calibration of %D Values**

Analysis	Compound	Number of Affected Samples	Qualification
	Benzo(g,h,i)perylene	6	J
	Diallate	18	J
	Dibenzo(a,h)anthracene	10	J
	Hexachlorocyclopentadiene	1	J
	Hexachlorophene	6	J
	Methapyrilene	6	J

Contract required detection limit (CRDL) standards were analyzed to evaluate instrument performance at low-level concentrations that are near the analytical method PQL. These standards are required to have recoveries between 80% and 120% to verify that the analytical instrumentation was properly calibrated. When CRDL standard recoveries were outside the 80% to 120% control limits, the affected samples with detected results at or near the PQL concentration (i.e., less than three times the PQL) were qualified as estimated (J). The analytes that did not meet CRDL criteria and the number of samples qualified due to those deviations are presented in the following table.

**Analytes Qualified Due to CRDL Standard Recovery Deviations**

Analysis	Analyte	Number of Affected Samples	Qualification
Inorganics	Antimony	1	J
	Beryllium	11	J
Inorganics (cont.)	Cadmium	14	J
	Chromium	1	J
	Cobalt	4	J
	Copper	3	J
	Lead	6	J
	Nickel	5	J
	Selenium	1	J
	Silver	6	J
	Thallium	16	J
	Zinc	1	J

Matrix spike/Matrix spike duplicate (MS/MSD) sample analysis recovery criteria for organic analysis require that the MS/MSD recoveries be within the laboratory-generated QC acceptance limits specified on the MS/MSD reporting form and inorganics MS recoveries must be within 75% to 125%. Organic and inorganic sample results associated with MS/MSD recoveries less than the specified control limit, but greater than 10% and 30%, respectively, were qualified as estimated (J). Organic non-detect sample results that exceeded these limits and had MS/MSD recoveries less than 10% were qualified as rejected (R). The analytes/compounds that did not meet MS/MSD recovery criteria and the number of samples qualified due to those deviations are presented in the following table.

**Analytes/Compounds Qualified Due to MS/MSD Recovery Deviations**

<b>Analysis</b>	<b>Analyte/Compound</b>	<b>Number of Affected Samples</b>	<b>Qualification</b>
Inorganics	Barium	11	J
	Copper	5	J
	Lead	6	J
	Zinc	6	J
	Selenium	5	J
	Antimony	7	J
VOCs	Vinyl Chloride	1	J
	1,1,1,2-Tetrachloroethane	2	J
	1,1,2,2-Tetrachloroethane	3	R
	1,1,2-Trichloroethane	3	J
	1,2,3-Trichloropropane	2	J
	1,2-Dibromo-3-chloropropane	1	R
		1	J
	1,2-Dibromoethane	2	J
	Bromodichloromethane	2	J
	Bromoform	2	J
	Carbon Disulfide	2	J
	VOCs (cont.)	Chlorobenzene	2
Chloroform		1	J
Dibromochloromethane		1	J
Dichlorodifluoromethane		1	J
Styrene		1	J
Toluene		1	J
Bromodichloromethane		1	J
Chloroform		1	J
Dibromochloromethane		1	J
Dibromomethane		1	J
Tetrachloroethene		2	J
Toluene		1	J

MS/MSD sample analysis recovery criteria for organics and inorganics require that the RPD between the MS and MSD recoveries be less than the laboratory-generated QC acceptance limits specified on the MS/MSD reporting form. The analytes/compounds that exceeded the RPD limit and the number of samples qualified due to deviations are presented in the following table.

**Analytes/Compounds Qualified Due to MS/MSD RPD Deviations**

<b>Analysis</b>	<b>Analytes/Compound</b>	<b>Number of Affected Samples</b>	<b>Qualification</b>
Inorganics	Barium	6	J
	Copper	5	J
	Lead	6	J
	Zinc	6	J

**Analytes/Compounds Qualified Due to MS/MSD RPD Deviations**

<b>Analysis</b>	<b>Analytes/Compound</b>	<b>Number of Affected Samples</b>	<b>Qualification</b>
PCBs	Aroclor-1016	1	J
	Aroclor-1221	1	J
	Aroclor-1232	1	J
	Aroclor-1242	1	J
	Aroclor-1248	1	J
	Aroclor-1254	1	J
	Aroclor-1260	1	J
VOCs	4-Methyl-2-pentanone	1	J
	Toluene	1	J
SVOCs	1,2,4-Trichlorobenzene	1	J
	1,2-Dichlorobenzene	1	J
	1,3-Dichlorobenzene	1	J
	1,4-Dichlorobenzene	1	J
	2,4-Dinitrotoluene	1	J
SVOCs (cont.)	2,6-Dinitrotoluene	1	J
	2-Chloronaphthalene	1	J
	2-Methylnaphthalene	1	J
	2-Nitroaniline	1	J
	3,3'-Dichlorobenzidine	1	J
	4-Bromophenyl-phenylether	1	J
	4-Chloroaniline	1	J
	4-Chlorophenyl-phenylether	1	J
	4-Nitroaniline	1	J
	Acenaphthene	1	J
	Acenaphthylene	1	J
	Anthracene	1	J
	Benzo(a)anthracene	1	J
	Benzo(a)pyrene	1	J
	Benzo(b)fluoranthene	1	J
	Benzo(k)fluoranthene	1	J
	Benzyl Alcohol	1	J
	bis(2-Chloroethoxy)methane	1	J
	bis(2-Chloroethyl)ether	1	J
	bis(2-Chloroisopropyl)ether	1	J
	bis(2-Ethylhexyl)phthalate	1	J
	Butylbenzylphthalate	1	J
	Chrysene	1	J
	Dibenzo(a,h)anthracene	1	J
	Dibenzofuran	1	J
	Diethylphthalate	1	J
	Di-n-Butylphthalate	1	J
Diphenylamine	1	J	

**Analytes/Compounds Qualified Due to MS/MSD RPD Deviations**

<b>Analysis</b>	<b>Analytes/Compound</b>	<b>Number of Affected Samples</b>	<b>Qualification</b>
	Fluoranthene	1	J
	Fluorene	1	J
	Hexachlorobenzene	1	J
	Hexachlorobutadiene	1	J
	Hexachloroethane	1	J
	Indeno(1,2,3-cd)pyrene	1	J
	Isophorone	1	J
	Naphthalene	1	J
	Nitrobenzene	1	J
	N-Nitroso-di-n-propylamine	1	J
	Phenanthrene	1	J
SVOCs (cont.)	Pyrene	1	J
	Pyridine	1	J

Laboratory control sample (LCS) analysis recovery criteria for organics must be within the laboratory-generated QC acceptance limits specified on the LCS reporting form. Organic sample results associated with an LCS that exceeded laboratory-generated QC acceptance limits and exhibited a recovery greater than 10% were qualified as estimated (J). Associated non-detect organic sample results that exhibited LCS recoveries below 10% were qualified as rejected (R). The compounds that did not meet LCS recovery criteria and the number of samples qualified due to those deviations are presented below.

**Compounds Qualified Due to LCS Recovery Deviations**

<b>Analysis</b>	<b>Compound</b>	<b>Number of Affected Samples</b>	<b>Qualification</b>
VOCs	1,2-Dibromo-3-chloropropane	1	J
	2-Chloroethylvinylether	1	R
	2-Hexanone	22	J
	4-Methyl-2-pentanone	23	J
	Acetone	1	J
	Styrene	3	J
	trans-1,4-Dichloro-2-butene	1	J
SVOCs	2,4-Dinitrophenol	1	J
	Benzo(g,h,i)perylene	6	J
	Hexachloroethane	1	J
	Pyridine	1	R
		1	J
Indeno(1,2,3-cd)pyrene	6	J	

Blank action levels for organic and inorganic analytes/compounds detected in the blanks were calculated at five times the blank concentrations (blank action levels were calculated at 10 times the blank concentration for



common laboratory contaminants). Detected sample results that were below the blank action level were qualified with a "U." The analytes detected in method/analytical blanks which resulted in qualification of sample data, along with the number of affected samples, are presented in the following table.

#### Analytes Qualified Due to Blank Deviations

Analysis	Analyte	Number of Affected Samples	Qualification
Inorganics	Beryllium	12	U
	Cadmium	10	U
	Selenium	4	U
	Silver	9	U
	Barium	1	U
	Vanadium	3	U
	Zinc	3	U

Internal standard compounds for VOC analysis are required to have area counts that are not greater than two times (+100%) or less than one-half (-50%) of the area counts for the continuing calibration standard. Internal standard compounds that exceeded recovery criteria resulted in the qualification of sample results for compounds that were quantified with the deviant standard. VOC sample results for the associated compounds were qualified as estimated (J) when the internal standard recovery was less than 50% but greater than 25%. The compounds associated with internal standards which exceeded the recovery criteria and the number of samples qualified due to those deviations are presented below.

#### Compounds Qualified Due to Internal Standard Recovery Deviations

Analysis	Compound	Number of Affected Samples	Qualification
VOCs	1,1,1,2-Tetrachloroethane	5	J
	1,1,2-Trichloroethane	5	J
	1,2-Dibromoethane	5	J
	2-Hexanone	5	J
	Bromoform	5	J
	Chlorobenzene	5	J
	Dibromochloromethane	5	J
	Ethyl Methacrylate	5	J
	Ethylbenzene	5	J
	Styrene	5	J
	Tetrachloroethene	5	J
	Toluene	5	J
	trans-1,3-Dichloropropene	5	J
Xylenes (total)	5	J	

Field duplicate samples were analyzed to evaluate the overall precision of laboratory and field procedures. The RPD between field duplicate samples is required to be less than 50% for soil sample values greater than five times the PQL for inorganics. Sample results that exceeded these limits were qualified as estimated (J). The analytes that did not meet field duplicate RPD requirements and the number of samples qualified due to those deviations are presented in the following table.

**Analytes Qualified Due to Field Duplicate Deviations**

Analysis	Analyte	Number of Affected Samples	Qualification
Inorganics	Barium	6	J
	Lead	6	J
	Zinc	6	J

Surrogate compounds are analyzed with every organic sample to aid in evaluation of the sample extraction efficiency. As specified in the FSP/QAPP, two of the three SVOC surrogate compounds within each fraction, and all of the VOC surrogate compounds must have a recovery between laboratory-specified control limits. Associated sample results were qualified as estimated (J) for all compounds when surrogate recovery criteria were outside control limits and greater than 10%. Non-detect sample results associated with surrogate recoveries less than 10% were qualified as rejected (R). A summary of the compounds affected by surrogate recovery exceedences and the number of samples qualified due to those deviations are presented in the following table.

**Compounds Qualified Due to Surrogate Recovery Deviations**

Analysis	Compound	Number of Affected Samples	Qualification
VOCs	All VOC Compounds	2	J
SVOCs	All Acid Compounds	15	R
		1	J

## **5.0 Overall Data Usability**

This section summarizes the analytical data in terms of its completeness and usability for site characterization purposes. Data completeness is defined as the percentage of sample results that have been determined to be usable during the data validation process. The percent usability calculation included analyses evaluated under both the Tier I and Tier II data validation reviews. Data completeness with respect to usability was calculated separately for inorganic and each of the organic analysis. The percent usability calculation also includes quality control samples collected to aid in the evaluation of data usability. Therefore, field/equipment blank, trip blank, and field duplicate data determined to be unusable as a result of the validation process are represented in the percent usability value tabulated in the following table.

**Data Usability**

Parameter	Percent Usability	Rejected Data
Metals	100	None

### Data Usability

Parameter	Percent Usability	Rejected Data
VOCs	99.7	A total of four sample results were rejected due to MS/MSD recovery deviations. A total of one sample result was rejected due to LCS recovery deviations.
SVOCs	91.4	A total of 240 sample results were rejected due to surrogate recovery deviations. A total of eight sample results were rejected due to LCS recovery deviations.
PCBs	100	None

The data package completeness, as determined from the Tier I data review, was used in combination with the data quality deviations identified during the Tier II data review to determine overall data quality. As specified in the FSP/QAPP, the overall precision, accuracy, representativeness, comparability, and completeness (PARCC) parameters determined from the Tier I and Tier II data reviews were used as indicators of overall data quality. These parameters were assessed through an evaluation of the results of the field and laboratory QA/QC sample analyses to provide a measure of compliance of the analytical data with the Data Quality Objectives (DQOs) specified in the FSP/QAPP. Therefore, the following sections present summaries of the PARCC parameters assessment with regard to the DQOs specified in the FSP/QAPP.

#### **5.1 Precision**

Precision measures the reproducibility of measurements under a given set of conditions. Specifically, it is a quantitative measure of the variability of a group of measurements compared to their average value. For this investigation, precision was defined as the RPD between duplicate sample results. The duplicate samples used to evaluate precision included laboratory duplicates, field duplicates, MS/MSD samples, and ICP serial dilution samples. For this analytical program, 1.6% of the data required qualification due to MS/MSD RPD deviations, and 0.35% of the data required qualification due to field duplicate RPD deviations. None of the data required qualification due to laboratory duplicate RPD deviations or ICP serial dilution deviations.

#### **5.2 Accuracy**

Accuracy measures the bias in an analytical system or the degree of agreement of a measurement with a known reference value. For this investigation, accuracy was defined as the percent recovery of QA/QC samples that were spiked with a known concentration of an analyte or compound of interest. The QA/QC samples used to evaluate analytical accuracy included instrument calibration, internal standards, LCSs, MS/MSD samples, CRDL samples, and surrogate compound recoveries. For this analytical program, 10.1% of the data required qualification due to instrument calibration deviations, 1.5% of the data required qualification due to MS/MSD recovery deviations, 1.4% of the data required qualification due to CRDL recovery deviations, 1.3% of the data required qualification due to LCS recovery deviations, 1.4% of the data required qualification due to internal standard and 7.2% of the data required qualification due to surrogate compound recovery deviations.

#### **5.3 Representativeness**

Representativeness expresses the degree to which sample data accurately and precisely represents a characteristic of a population, parameter variations at a sampling point, or an environmental condition. Representativeness is a qualitative parameter, which is most concerned with the proper design of the sampling program. The representativeness criterion is best satisfied by making certain that sampling locations are selected properly and a sufficient number of samples are collected. This parameter has been addressed by collecting samples at locations specified in MDEP-approved work plans, and by following the procedures for sample collection/analyses that were described in the FSP/QAPP. Additionally, the analytical program used procedures consistent with USEPA-approved analytical methodology. A QA/QC parameter that is an indicator of the representativeness of a sample is holding time. Holding time criteria are established to maintain the samples in a state that is representative of the in-situ field conditions before analysis. For this analytical program, none of the data required qualification due to holding time deviations.

#### **5.4 Comparability**

Comparability is a qualitative parameter expressing the confidence with which one data set can be compared with another. This goal was achieved through the use of the standardized techniques for sample collection and analysis presented in the FSP/QAPP. The USEPA SW-846<sup>1</sup> analytical methods presented in the FSP/QAPP are updated on occasion by the USEPA to benefit from recent technological advancements in analytical chemistry and instrumentation. In most cases, the method upgrades include the incorporation of new technology that improves the sensitivity and stability of the instrumentation or allows the laboratory to increase throughput without hindering accuracy and precision. Overall, the analytical methods for this investigation have remained consistent in their general approach through continued use of the basic analytical techniques (e.g., sample extraction/preparation, instrument calibration, QA/QC procedures). Through this use of consistent base analytical procedures and by requiring that updated procedures meet the QA/QC criteria specified in the FSP/QAPP, the analytical data from past, present, and future sampling events will be comparable to allow for qualitative and quantitative assessment of site conditions.

#### **5.5 Completeness**

Completeness is defined as the percentage of measurements that are judged to be valid or usable to meet the prescribed DQOs. The completeness criterion is essentially the same for all data uses -- the generation of a sufficient amount of valid data. The actual completeness of this analytical data set ranged from 91.4% to 100% for individual analytical parameters and had an overall usability of 97.8%, which is greater than the minimum required usability of 90% as specified in the FSP/QAPP.

The rejected sample data for these investigations include sample analyses results for 240 SVOCs due to low surrogate recoveries, eight SVOCs and one VOC due to a low LCS recovery. Reanalysis has demonstrated matrix interference and the same analytical performance limitations for the analysis could occur again; therefore, resampling at this location is not recommended.

Also, four VOC sample results were rejected due to MS/MSD recovery deviations. Resampling at these locations is not recommended since duplicate analysis of the MS has demonstrated matrix interference and the same analytical performance limitations for the analysis could occur again.

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<sup>1</sup> Test Methods for evaluating Solid Waste, SW-846, USEPA, Final Update III, December 1996.

TABLE 3 - 1  
ANALYTICAL DATA VALIDATION SUMMARY

BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING  
EAST STREET AREA 2 - NORTH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
<b>PCBs</b>											
G135-275	16-3-F2	1/18/2007	Solid	Tier II	No						
G135-275	16-3-F3	1/18/2007	Solid	Tier II	No						
G135-275	16-3-F4	1/18/2007	Solid	Tier II	No						
G135-275	16-3-W2	1/18/2007	Solid	Tier II	No						
G135-275	16-3-W4	1/18/2007	Solid	Tier II	No						
G135-275	RinseBlank-1	1/18/2007	Water	Tier II	No						
G135-276	16-1-W1	1/16/2007	Solid	Tier II	No						
G135-276	16-1-W3	1/16/2007	Solid	Tier II	No						
G135-276	16-1-W5	1/16/2007	Solid	Tier II	No						
G135-276	16-1-W6	1/16/2007	Solid	Tier II	No						
G135-276	16-1-W8	1/16/2007	Solid	Tier II	No						
G135-276	16-2-W1	1/16/2007	Solid	Tier II	No						
G135-276	16-2-W4	1/16/2007	Solid	Tier II	No						
G135-277	16-2-F2	1/17/2007	Solid	Tier II	No						
G135-277	16-2-F3	1/17/2007	Solid	Tier II	No						
G135-277	16-2-F4	1/17/2007	Solid	Tier II	No						
G135-277	16-4-F1	1/17/2007	Solid	Tier II	No						
G135-277	16-4-F2	1/17/2007	Solid	Tier II	No						
G135-277	16-4-F3	1/17/2007	Solid	Tier II	No						
G135-277	16-4-F4	1/17/2007	Solid	Tier II	No						
G135-277	16-4-W1	1/17/2007	Solid	Tier II	No						
G135-277	16-4-W3	1/17/2007	Solid	Tier II	Yes	Aroclor-1016	MS/MSD RPD	13.9%	<12%	ND(0.045) J	
						Aroclor-1221	MS/MSD RPD	13.9%	<12%	ND(0.045) J	
						Aroclor-1232	MS/MSD RPD	13.9%	<12%	ND(0.045) J	
						Aroclor-1242	MS/MSD RPD	13.9%	<12%	ND(0.045) J	
						Aroclor-1248	MS/MSD RPD	13.9%	<12%	ND(0.045) J	
						Aroclor-1254	MS/MSD RPD	13.9%	<12%	0.55 J	
						Aroclor-1260	MS/MSD RPD	13.9%	<12%	0.24 J	
						Total PCBs	MS/MSD RPD	13.9%	<12%	0.79 J	
G135-277	16-4-W5	1/17/2007	Solid	Tier II	No						
G135-277	16-5-F1	1/17/2007	Solid	Tier II	No						
G135-277	16-Dup-2	1/17/2007	Solid	Tier II	No						16-4-W3
G135-281	11-1-W1	1/24/2007	Solid	Tier II	No						
G135-281	11-1-W3	1/24/2007	Solid	Tier II	No						
G135-281	11-1-W4	1/24/2007	Solid	Tier II	No						
G135-281	11-1-W6	1/24/2007	Solid	Tier II	No						
G135-281	11-1-W7	1/24/2007	Solid	Tier II	No						
G135-281	11-1-W9	1/24/2007	Solid	Tier II	No						
G135-281	RB-012407-1	1/24/2007	Solid	Tier II	No						
G135-282	11-2-F1	1/23/2007	Solid	Tier II	No						
G135-282	11-2-F3	1/23/2007	Solid	Tier II	No						
G135-282	11-2-F4	1/23/2007	Solid	Tier II	No						
G135-282	11-2-F5	1/23/2007	Solid	Tier II	No						
G135-282	11-2-W1	1/23/2007	Solid	Tier II	No						
G135-282	11-2-W2	1/23/2007	Solid	Tier II	No						
G135-282	11-2-W5	1/23/2007	Solid	Tier II	No						
G135-282	11-3-F1	1/23/2007	Solid	Tier II	No						
G135-282	11-3-F3	1/23/2007	Solid	Tier II	No						
G135-282	11-3-F4	1/23/2007	Solid	Tier II	No						
G135-282	11-3-W1	1/23/2007	Solid	Tier II	No						
G135-282	11-3-W3	1/23/2007	Solid	Tier II	No						
G135-282	11-3-W4	1/23/2007	Solid	Tier II	No						
G135-282	11-Dup-1	1/23/2007	Solid	Tier II	No						11-3-F3
G135-282	11-PH-F1	1/23/2007	Solid	Tier II	No						
<b>Metals</b>											
G135-275	16-3-F1	1/18/2007	Solid	Tier II	Yes	Beryllium	Associated Blank	-	-	ND(0.997)	
						Cadmium	Associated Blank	-	-	ND(0.997)	
						Cadmium	CRDL Standard %R	5.3%	80% to 120%	ND(0.997) J	
						Thallium	CRDL Standard %R	44.0%	80% to 120%	ND(0.997) J	
G135-275	16-3-W1	1/18/2007	Solid	Tier II	Yes	Beryllium	Associated Blank	-	-	ND(0.997)	
						Cadmium	CRDL Standard %R	5.3%	80% to 120%	ND(0.944) J	
						Thallium	CRDL Standard %R	44.0%	80% to 120%	ND(0.944) J	
G135-275	16-3-W3	1/18/2007	Solid	Tier II	Yes	Beryllium	Associated Blank	-	-	ND(0.997)	
						Cadmium	CRDL Standard %R	5.3%	80% to 120%	ND(0.945) J	

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
<b>Metals cont.</b>											
G135-275	16-3-W3	1/18/2007	Solid	Tier II	Yes	Thallium	CRDL Standard %R	44.0%	80% to 120%	ND(0.945) J	
G135-275	RinseBlank-1	1/18/2007	Water	Tier II	Yes	Antimony	CRDL Standard %R	78.5%	80% to 120%	ND(0.0400) J	
						Cadmium	CRDL Standard %R	75.0%	80% to 120%	0.00343 J	
						Chromium	CRDL Standard %R	135.0%	80% to 120%	0.00345 J	
						Cobalt	CRDL Standard %R	125.0%	80% to 120%	0.00297 J	
						Copper	CRDL Standard %R	166.0%	80% to 120%	0.00619 J	
						Nickel	CRDL Standard %R	142.0%	80% to 120%	0.00156 J	
						Selenium	CRDL Standard %R	135.0%	80% to 120%	ND(0.0200) J	
						Zinc	CRDL Standard %R	223.0%	80% to 120%	0.00365 J	
G135-276	16-1-W2	1/16/2007	Solid	Tier II	Yes	Antimony	MS/MSD %R	39.5%, 39.7%	75% to 125%	0.0468 J	
						Barium	MS %R	159.0%	75% to 125%	108 J	
						Barium	MS/MSD RPD	46.0%	<20%	108 J	
						Barium	Field Duplicate RPD (Solid)	85.6%	<50%	108 J	
						Beryllium	Associated Blank	-	-	ND(0.974)	
						Cadmium	CRDL Standard %R	10.6%	80% to 120%	0.0205 J	
						Lead	MS %R	228.0%	75% to 125%	9.56 J	
						Lead	MS/MSD RPD	50.1%	<20%	9.56 J	
						Lead	Field Duplicate RPD (Solid)	120.1%	<50%	9.56 J	
						Thallium	CRDL Standard %R	44.0%	80% to 120%	ND(0.974) J	
						Zinc	MS %R	364.0%	75% to 125%	71.5 J	
						Zinc	MS/MSD RPD	70.4%	<20%	71.5 J	
						Zinc	Field Duplicate RPD (Solid)	78.9%	<50%	71.5 J	
G135-276	16-1-W4	1/16/2007	Solid	Tier II	Yes	Antimony	MS/MSD %R	39.5%, 39.7%	75% to 125%	0.0888 J	
						Barium	MS %R	159.0%	75% to 125%	94.1 J	
						Barium	MS/MSD RPD	46.0%	<20%	94.1 J	
						Barium	Field Duplicate RPD (Solid)	85.6%	<50%	94.1 J	
						Beryllium	Associated Blank	-	-	ND(1.02)	
						Lead	MS %R	228.0%	75% to 125%	45.9 J	
						Lead	MS/MSD RPD	50.1%	<20%	45.9 J	
						Lead	Field Duplicate RPD (Solid)	120.1%	<50%	45.9 J	
						Selenium	Associated Blank	-	-	ND(2.04)	
						Zinc	MS %R	364.0%	75% to 125%	73.4 J	
						Zinc	MS/MSD RPD	70.4%	<20%	73.4 J	
						Zinc	Field Duplicate RPD (Solid)	78.9%	<50%	73.4 J	
G135-276	16-1-W7	1/16/2007	Solid	Tier II	Yes	Antimony	MS/MSD %R	39.5%, 39.7%	75% to 125%	0.492 J	
						Barium	MS %R	159.0%	75% to 125%	185 J	
						Barium	MS/MSD RPD	46.0%	<20%	185 J	
						Barium	Field Duplicate RPD (Solid)	85.6%	<50%	185 J	
						Beryllium	Associated Blank	-	-	ND(0.903)	
						Lead	MS %R	228.0%	75% to 125%	16.8 J	
						Lead	MS/MSD RPD	50.1%	<20%	16.8 J	
						Lead	Field Duplicate RPD (Solid)	120.1%	<50%	16.8 J	
						Zinc	MS %R	364.0%	75% to 125%	163 J	
						Zinc	MS/MSD RPD	70.4%	<20%	163 J	
						Zinc	Field Duplicate RPD (Solid)	78.9%	<50%	163 J	
G135-276	16-2-W2	1/16/2007	Solid	Tier II	Yes	Antimony	MS/MSD %R	39.5%, 39.7%	75% to 125%	0.0833 J	
						Barium	MS %R	159.0%	75% to 125%	127 J	
						Barium	MS/MSD RPD	46.0%	<20%	127 J	
						Barium	Field Duplicate RPD (Solid)	85.6%	<50%	127 J	
						Lead	MS %R	228.0%	75% to 125%	60.5 J	
						Lead	MS/MSD RPD	50.1%	<20%	60.5 J	
						Lead	Field Duplicate RPD (Solid)	120.1%	<50%	60.5 J	
						Zinc	MS %R	364.0%	75% to 125%	142 J	
						Zinc	MS/MSD RPD	70.4%	<20%	142 J	
						Zinc	Field Duplicate RPD (Solid)	78.9%	<50%	142 J	
G135-276	16-2-W3	1/16/2007	Solid	Tier II	Yes	Antimony	MS/MSD %R	39.5%, 39.7%	75% to 125%	0.0696 J	
						Barium	MS %R	159.0%	75% to 125%	106 J	
						Barium	MS/MSD RPD	46.0%	<20%	106 J	
						Barium	Field Duplicate RPD (Solid)	85.6%	<50%	106 J	
						Beryllium	Associated Blank	-	-	ND(0.940)	
						Lead	MS %R	228.0%	75% to 125%	20.5 J	
						Lead	MS/MSD RPD	50.1%	<20%	20.5 J	
						Lead	Field Duplicate RPD (Solid)	120.1%	<50%	20.5 J	
						Zinc	MS %R	364.0%	75% to 125%	80.3 J	

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
<b>Metals cont.</b>											
G135-276	16-2-W3	1/16/2007	Solid	Tier II	Yes	Zinc	MS/MSD RPD	70.4%	<20%	80.3 J	
						Zinc	Field Duplicate RPD (Solid)	78.9%	<50%	80.3 J	
G135-276	16-Dup-1	1/16/2007	Solid	Tier II	Yes	Antimony	MS/MSD %R	39.5%, 39.7%	75% to 125%	0.105 J	16-1-W4
						Barium	MS %R	159.0%	75% to 125%	235 J	
						Barium	MS/MSD RPD	46.0%	<20%	235 J	
						Barium	Field Duplicate RPD (Solid)	85.6%	<50%	235 J	
						Beryllium	Associated Blank	-	-	ND(1.01)	
						Lead	MS %R	228.0%	75% to 125%	184 J	
						Lead	MS/MSD RPD	50.1%	<20%	184 J	
						Lead	Field Duplicate RPD (Solid)	120.1%	<50%	184 J	
						Zinc	MS %R	364.0%	75% to 125%	169 J	
						Zinc	MS/MSD RPD	70.4%	<20%	169 J	
						Zinc	Field Duplicate RPD (Solid)	78.9%	<50%	169 J	
G135-277	16-2-F1	1/17/2007	Solid	Tier II	Yes	Beryllium	Associated Blank	-	-	ND(1.16)	
						Cadmium	CRDL Standard %R	5.3%	80% to 120%	0.0590 J	
G135-277	16-4-W2	1/17/2007	Solid	Tier II	Yes	Beryllium	Associated Blank	-	-	ND(1.04)	
						Cadmium	CRDL Standard %R	5.3%	80% to 120%	0.0527 J	
G135-277	16-4-W4	1/17/2007	Solid	Tier II	Yes	Beryllium	Associated Blank	-	-	ND(1.04)	
						Cadmium	CRDL Standard %R	5.3%	80% to 120%	0.230 J	
G135-281	11-1-W2	1/24/2007	Solid	Tier II	Yes	Antimony	MS/MSD %R	51.8%, 50.1%	75% to 125%	ND(4.03) J	
						Barium	MSD %R	73.9%	75% to 125%	145 J	
						Beryllium	CRDL Standard %R	78.4%	80% to 120%	0.412 J	
						Cadmium	Associated Blank	-	-	ND(1.01)	
						Cadmium	CRDL Standard %R	50.5%	80% to 120%	ND(1.01) J	
						Copper	MS %R	148.0%	75% to 125%	25.2 J	
						Copper	MS/MSD RPD	28.9%	<20%	25.2 J	
						Lead	CRDL Standard %R	71.2%	80% to 120%	2.37 J	
						Selenium	MSD %R	74.8%	75% to 125%	ND(2.02) J	
						Silver	Associated Blank	-	-	0.114 J	
						Thallium	CRDL Standard %R	34.9%	80% to 120%	ND(1.01) J	
G135-281	11-1-W5	1/24/2007	Solid	Tier II	Yes	Barium	MSD %R	73.9%	75% to 125%	51.6 J	
						Beryllium	CRDL Standard %R	78.4%	80% to 120%	0.0296 J	
						Cadmium	CRDL Standard %R	50.5%	80% to 120%	0.472 J	
						Copper	MS %R	148.0%	75% to 125%	13.4 J	
						Copper	MS/MSD RPD	28.9%	<20%	13.4 J	
						Selenium	MSD %R	74.8%	75% to 125%	ND(1.74) J	
						Thallium	CRDL Standard %R	34.9%	80% to 120%	0.818 J	
G135-281	11-1-W8	1/24/2007	Solid	Tier II	Yes	Barium	MSD %R	73.9%	75% to 125%	77.7 J	
						Beryllium	CRDL Standard %R	78.4%	80% to 120%	ND(1.05) J	
						Cadmium	Associated Blank	-	-	ND(1.05)	
						Cadmium	CRDL Standard %R	50.5%	80% to 120%	ND(1.05) J	
						Copper	MS %R	148.0%	75% to 125%	8.84 J	
						Copper	MS/MSD RPD	28.9%	<20%	8.84 J	
						Selenium	MSD %R	74.8%	75% to 125%	ND(2.11) J	
						Silver	Associated Blank	-	-	0.0959 J	
						Thallium	CRDL Standard %R	34.9%	80% to 120%	ND(1.05) J	
G135-281	11-Dup-2	1/24/2007	Solid	Tier II	Yes	Barium	MSD %R	73.9%	75% to 125%	171 J	11-1-W2
						Beryllium	CRDL Standard %R	78.4%	80% to 120%	ND(0.993) J	
						Cadmium	Associated Blank	-	-	ND(0.993)	
						Cadmium	CRDL Standard %R	50.5%	80% to 120%	ND(0.993) J	
						Copper	MS %R	148.0%	75% to 125%	33.2 J	
						Copper	MS/MSD RPD	28.9%	<20%	33.2 J	
						Lead	CRDL Standard %R	71.2%	80% to 120%	2.65 J	
						Selenium	MSD %R	74.8%	75% to 125%	ND(1.99) J	
						Silver	Associated Blank	-	-	ND(0.993)	
						Thallium	CRDL Standard %R	34.9%	80% to 120%	ND(0.993) J	
G135-281	RB-012407-1	1/24/2007	Water	Tier II	Yes	Barium	MSD %R	73.9%	75% to 125%	ND(0.100) J	
						Cadmium	CRDL Standard %R	42.3%	80% to 120%	ND(0.0100) J	
						Copper	CRDL Standard %R	134.0%	80% to 120%	0.00290 J	
						Copper	MS %R	148.0%	75% to 125%	0.00290 J	
						Copper	MS/MSD RPD	28.9%	<20%	0.00290 J	
						Nickel	CRDL Standard %R	78.9%	80% to 120%	ND(0.0100) J	
						Selenium	MSD %R	74.8%	75% to 125%	ND(0.0200) J	
						Thallium	CRDL Standard %R	30.6%	80% to 120%	ND(0.0100) J	

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes						
<b>Metals cont.</b>																	
G135-282	11-2-F2	1/23/2007	Solid	Tier II	Yes	Beryllium	CRDL Standard %R	78.4%	80% to 120%	0.156 J							
						Cadmium	Method Blank	-	-	ND(1.01)							
						Silver	Method Blank	-	-	ND(1.01)							
						Silver	CRDL Standard %R	131.0%	80% to 120%	ND(1.01) J							
						Thallium	CRDL Standard %R	69.8%	80% to 120%	0.542 J							
G135-282	11-2-W3	1/23/2007	Solid	Tier II	Yes	Barium	Method Blank	-	-	5.34 J							
						Beryllium	CRDL Standard %R	78.4%	80% to 120%	ND(1.00) J							
						Cadmium	Method Blank	-	-	ND(1.00)							
						Cobalt	CRDL Standard %R	131.0%	80% to 120%	2.12 J							
						Lead	CRDL Standard %R	71.2%	80% to 120%	0.348 J							
						Nickel	CRDL Standard %R	131.0%	80% to 120%	1.96 J							
						Selenium	Method Blank	-	-	ND(2.00)							
						Silver	Method Blank	-	-	ND(1.00)							
						Silver	CRDL Standard %R	131.0%	80% to 120%	ND(1.00) J							
						Thallium	CRDL Standard %R	69.8%	80% to 120%	ND(1.00) J							
						Vanadium	Method Blank	-	-	ND(5.00)							
						Zinc	Method Blank	-	-	ND(2.00)							
						G135-282	11-2-W4	1/23/2007	Solid	Tier II	Yes	Beryllium	CRDL Standard %R	78.4%	80% to 120%	0.176 J	
Cadmium	Method Blank	-	-	ND(0.463)													
Cobalt	CRDL Standard %R	131.0%	80% to 120%	1.25 J													
Lead	CRDL Standard %R	71.2%	80% to 120%	ND(0.926) J													
Nickel	CRDL Standard %R	131.0%	80% to 120%	1.48 J													
Selenium	Method Blank	-	-	ND(1.85)													
Silver	Method Blank	-	-	ND(0.926)													
Silver	CRDL Standard %R	131.0%	80% to 120%	ND(0.926) J													
Thallium	CRDL Standard %R	69.8%	80% to 120%	ND(0.926) J													
Vanadium	Method Blank	-	-	ND(4.63)													
Zinc	Method Blank	-	-	ND(1.85)													
G135-282	11-3-F2	1/23/2007	Solid	Tier II	Yes							Beryllium	CRDL Standard %R	78.4%	80% to 120%	ND(0.974) J	
												Cadmium	Method Blank	-	-	ND(0.974)	
						Silver	Method Blank	-	-	ND(0.974)							
						Silver	CRDL Standard %R	131.0%	80% to 120%	ND(0.974) J							
						Thallium	CRDL Standard %R	69.8%	80% to 120%	ND(0.974) J							
						G135-282	11-3-W2	1/23/2007	Solid	Tier II	Yes	Beryllium	CRDL Standard %R	78.4%	80% to 120%	ND(0.983) J	
						Cadmium	Method Blank	-	-	ND(0.983)							
Cobalt	CRDL Standard %R	131.0%	80% to 120%	1.60 J													
Copper	CRDL Standard %R	134.0%	80% to 120%	1.65 J													
Lead	CRDL Standard %R	71.2%	80% to 120%	ND(0.983) J													
Nickel	CRDL Standard %R	131.0%	80% to 120%	1.08 J													
Selenium	Method Blank	-	-	ND(1.97)													
Silver	Method Blank	-	-	ND(0.983)													
Silver	CRDL Standard %R	131.0%	80% to 120%	ND(0.983) J													
Thallium	CRDL Standard %R	69.8%	80% to 120%	ND(0.983) J													
Vanadium	Method Blank	-	-	ND(4.91)													
Zinc	Method Blank	-	-	ND(1.97)													
G135-282	11-PH-W1	1/23/2007	Solid	Tier II	Yes	Beryllium	CRDL Standard %R	78.4%	80% to 120%	ND(0.991) J							
						Cadmium	Method Blank	-	-	ND(0.991)							
						Lead	CRDL Standard %R	71.2%	80% to 120%	2.28 J							
						Silver	Method Blank	-	-	ND(0.991)							
						Silver	CRDL Standard %R	131.0%	80% to 120%	ND(0.991) J							
						Thallium	CRDL Standard %R	69.8%	80% to 120%	ND(0.991) J							
G135-286	16-4-F1	1/29/2007	Solid	Tier II	Yes	Beryllium	Method Blank	-	-	ND(0.934)							
						Beryllium	CRDL Standard %R	151.0%	80% to 120%	ND(0.934) J							
						Cadmium	CRDL Standard %R	35.7%	80% to 120%	0.335 J							
						Thallium	CRDL Standard %R	0.0%	80% to 120%	ND(0.934) J							
<b>VOCs</b>																	
G135-275	16-3-F1	1/18/2007	Solid	Tier II	Yes	1,2,3-Trichloropropane	CCAL %D	26.6%	<25%	ND(0.0048) J							
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.8) J							
						2-Butanone	CCAL %D	43.2%	<25%	ND(0.0048) J							
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.024) J							
						2-Hexanone	LCS %R	57.3%	61.2% to 139%	ND(0.0048) J							
						4-Methyl-2-pentanone	LCS %R	64.1%	65.1% to 135%	ND(0.0048) J							
						Acetone	CCAL %D	61.1%	<25%	0.019 J							
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.96) J							



**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
<b>VOCs cont.</b>											
G135-275	16-3-F1	1/18/2007	Solid	Tier II	Yes	Acrolein	ICAL RRF	0.039	>0.05	ND(0.059) J	
						Acrolein	CCAL %D	28.2%	<25%	ND(0.059) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.4) J	
						Methylene Chloride	CCAL %D	31.3%	<25%	ND(0.0048) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.96) J	
G135-275	16-3-W1	1/18/2007	Solid	Tier II	Yes	1,1,2,2-Tetrachloroethane	MS/MSD %R	2.8%, 0.0%	68.8% to 175%	R	
						1,1,2-Trichloroethane	MS/MSD %R	75.9%, 67.4%	84.9% to 139%	ND(0.0047) J	
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.7) J	
						2-Butanone	CCAL %D	25.6%	<25%	ND(0.0047) J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.023) J	
						2-Hexanone	CCAL %D	29.7%	<25%	ND(0.0047) J	
						2-Hexanone	LCS %R	58.2%	61.2% to 139%	ND(0.0047) J	
						4-Methyl-2-pentanone	CCAL %D	36.2%	<25%	ND(0.0047) J	
						4-Methyl-2-pentanone	LCS %R	59.6%	65.1% to 135%	ND(0.0047) J	
						4-Methyl-2-pentanone	MS/MSD RPD	39.9%	<30%	ND(0.0047) J	
						Acetone	CCAL %D	26.5%	<25%	0.016 J	
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.93) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.057) J	
						Acrolein	CCAL %D	25.6%	<25%	ND(0.057) J	
						Bromodichloromethane	MSD %R	74.9%	77.4% to 140%	ND(0.0047) J	
						Chloroethane	CCAL %D	100.0%	<25%	ND(0.0047) J	
						Chloroethane	CCAL RRF	0.000	>0.05	ND(0.0047) J	
						Dibromochloromethane	MSD %R	75.4%	78.1% to 141%	ND(0.0047) J	
						Dibromomethane	MSD %R	75.1%	80.0% to 150%	ND(0.0047) J	
						Dichlorodifluoromethane	MS/MSD %R	67.0%, 80.8%	81.6% to 130%	ND(0.0047) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.3) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.93) J	
						Toluene	MSD %R	32.3%	70.5% to 138%	0.030 J	
Toluene	MS/MSD RPD	96.2%	<30%	0.030 J							
Vinyl Chloride	MS %R	71.2%	80.9% to 129%	ND(0.0047) J							
G135-275	16-3-W3	1/18/2007	Solid	Tier II	Yes	1,2,3-Trichloropropane	CCAL %D	26.6%	<25%	ND(0.0044) J	
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.4) J	
						2-Butanone	CCAL %D	43.2%	<25%	ND(0.0044) J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.022) J	
						2-Hexanone	LCS %R	57.3%	61.2% to 139%	ND(0.0044) J	
						4-Methyl-2-pentanone	LCS %R	64.1%	65.1% to 135%	ND(0.0044) J	
						Acetone	CCAL %D	61.1%	<25%	ND(0.0044) J	
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.89) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.055) J	
						Acrolein	CCAL %D	28.2%	<25%	ND(0.055) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.2) J	
						Methylene Chloride	CCAL %D	31.3%	<25%	ND(0.0044) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.89) J	
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(0.10) J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.013) J	
Acetone	CCAL %D	40.00%	<25%	ND(0.0050) J							
Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.020) J							
Acrolein	ICAL RRF	0.039	>0.05	ND(0.025) J							
Bromomethane	CCAL %D	27.60%	<25%	ND(0.0010) J							
Isobutanol	ICAL RRF	0.006	>0.05	ND(0.050) J							
Propionitrile	ICAL RRF	0.017	>0.05	ND(0.020) J							

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes						
<b>VOCs cont.</b>																	
G135-276	16-1-W2	1/16/2007	Solid	Tier II	Yes	1,1,1,2-Tetrachloroethane	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						1,1,2-Trichloroethane	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						1,2-Dibromoethane	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.6) J							
						2-Butanone	CCAL %D	25.6%	<25%	ND(0.0046) J							
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.023) J							
						2-Hexanone	CCAL %D	29.7%	<25%	ND(0.0046) J							
						2-Hexanone	LCS %R	58.2%	61.2% to 139%	ND(0.0046) J							
						2-Hexanone	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						4-Methyl-2-pentanone	CCAL %D	36.2%	<25%	ND(0.0046) J							
						4-Methyl-2-pentanone	LCS %R	59.6%	65.1% to 135%	ND(0.0046) J							
						Acetone	CCAL %D	26.5%	<25%	0.019 J							
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.91) J							
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.056) J							
						Acrolein	CCAL %D	25.6%	<25%	ND(0.056) J							
						Bromofrom	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						Chlorobenzene	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						Chloroethane	CCAL %D	100.0%	<25%	ND(0.0046) J							
						Chloroethane	CCAL RRF	0.000	>0.05	ND(0.0046) J							
						Dibromochloromethane	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						Ethyl Methacrylate	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						Ethylbenzene	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.3) J							
						Methylene Chloride	CCAL %D	37.8%	<25%	ND(0.0046) J							
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.91) J							
						Styrene	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						Tetrachloroethene	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						Toluene	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	0.0062 J							
						trans-1,3-Dichloropropene	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						Xylenes (total)	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0046) J							
						G135-276	16-1-W4	1/16/2007	Solid	Tier II	Yes	1,1,1,2-Tetrachloroethane	MS/MSD %R	58.6%, 54.2%	70.4% to 136%	ND(0.0048) J	
												1,1,1,2-Tetrachloroethane	Internal Standard Chlorobenzene-d5 %R	47.7%	50% to 200%	ND(0.0048) J	
												1,1,2,2-Tetrachloroethane	MS/MSD %R	0.0%, 1.8%	68.8% to 175%	R	
1,1,2-Trichloroethane	MS/MSD %R	24.3%, 21.9%	84.9% to 139%	ND(0.0048) J													
1,1,2-Trichloroethane	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J													
1,2,3-Trichloropropane	MS/MSD %R	42.7%, 41.5%	55.1% to 197%	ND(0.0048) J													
1,2-Dibromo-3-chloropropane	MS/MSD %R	20.0%, 22.3%	43.4% to 229%	ND(0.024) J													
1,2-Dibromoethane	MS/MSD %R	67.7%, 56.1%	78.3% to 148%	ND(0.0048) J													
1,2-Dibromoethane	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J													
1,2-Dichloroethane	CCAL %D	26.7%	<25%	ND(0.0048) J													
1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.8) J													
2-Butanone	CCAL %D	32.0%	<25%	0.0039 J													
2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.024) J													
2-Hexanone	LCS %R	57.5%	61.2% to 139%	ND(0.0048) J													
2-Hexanone	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J													
4-Methyl-2-pentanone	LCS %R	63.3%	65.1% to 135%	ND(0.0048) J													
Acetone	CCAL %D	46.0%	<25%	0.028 J													
Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.96) J													
Acrolein	ICAL RRF	0.039	>0.05	ND(0.059) J													
Acrolein	CCAL %D	38.5%	<25%	ND(0.059) J													
Acrylonitrile	CCAL %D	41.5%	<25%	ND(0.048) J													
Bromodichloromethane	MS/MSD %R	75.8%, 70.6%	77.4% to 140%	ND(0.0048) J													
Bromofrom	MS/MSD %R	56.6%, 53.1%	74.7% to 161%	ND(0.0048) J													
Bromofrom	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J													
Bromomethane	CCAL %D	37.4%	<25%	ND(0.0048) J													
Carbon Disulfide	MS/MSD %R	63.2%, 61.2%	64.3% to 145%	ND(0.0048) J													
Chlorobenzene	MS/MSD %R	65.6%, 53.3%	63.3% to 135%	ND(0.0048) J													
Chlorobenzene	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J													
Chlorofrom	MSD %R	70.6%	71.1% to 143%	ND(0.0048) J													
Chloromethane	CCAL %D	29.1%	<25%	ND(0.0048) J													
Dibromochloromethane	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J													
Dichlorodifluoromethane	CCAL %D	31.1%	<25%	ND(0.0048) J													
Ethyl Methacrylate	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J													
Ethylbenzene	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J													

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes						
<b>VOCs cont.</b>																	
G135-276	16-1-W4	1/16/2007	Solid	Tier II	Yes	Isobutanol	ICAL RRF	0.006	>0.05	ND(2.4) J							
						Methylene Chloride	CCAL %D	32.0%	<25%	ND(0.0048) J							
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.96) J							
						Styrene	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J							
						Tetrachloroethene	MSD %R	59.4%	61.6% to 137%	ND(0.0048) J							
						Tetrachloroethene	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J							
						Toluene	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J							
						trans-1,3-Dichloropropene	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J							
						Trichlorofluoromethane	CCAL %D	32.0%	<25%	ND(0.0048) J							
						Xylenes (total)	Internal Standard Chlorobenzene-d5 %R	49.4%	50% to 200%	ND(0.0048) J							
						1,2-Dichloroethane	CCAL %D	26.7%	<25%	ND(0.0048) J							
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.8) J							
G135-276	16-1-W7	1/16/2007	Solid	Tier II	Yes	2-Butanone	CCAL %D	32.0%	<25%	ND(0.0048) J							
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.024) J							
						2-Hexanone	LCS %R	57.5%	61.2% to 139%	ND(0.0048) J							
						4-Methyl-2-pentanone	LCS %R	63.3%	65.1% to 135%	ND(0.0048) J							
						Acetone	CCAL %D	46.0%	<25%	0.017 J							
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.95) J							
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.059) J							
						Acrolein	CCAL %D	38.5%	<25%	ND(0.059) J							
						Acrylonitrile	CCAL %D	41.5%	<25%	ND(0.048) J							
						Bromomethane	CCAL %D	37.4%	<25%	ND(0.0048) J							
						Chloromethane	CCAL %D	29.1%	<25%	ND(0.0048) J							
						Dichlorodifluoromethane	CCAL %D	31.1%	<25%	ND(0.0048) J							
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.4) J							
						Methylene Chloride	CCAL %D	32.0%	<25%	ND(0.0048) J							
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.95) J							
						Trichlorofluoromethane	CCAL %D	32.0%	<25%	ND(0.0048) J							
						G135-276	16-2-W2	1/16/2007	Solid	Tier II	Yes	1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(5.0) J	
												2-Butanone	CCAL %D	25.6%	<25%	0.0029 J	
2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.025) J													
2-Hexanone	CCAL %D	29.7%	<25%	ND(0.0050) J													
2-Hexanone	LCS %R	58.2%	61.2% to 139%	ND(0.0050) J													
4-Methyl-2-pentanone	CCAL %D	36.2%	<25%	ND(0.0050) J													
4-Methyl-2-pentanone	LCS %R	59.6%	65.1% to 135%	ND(0.0050) J													
Acetone	CCAL %D	26.5%	<25%	0.024 J													
Acetonitrile	ICAL RRF	0.011	>0.05	ND(1.0) J													
Acrolein	ICAL RRF	0.039	>0.05	ND(0.062) J													
Acrolein	CCAL %D	25.6%	<25%	ND(0.062) J													
Chloroethane	CCAL %D	100.0%	<25%	ND(0.0050) J													
Chloroethane	CCAL RRF	0.000	>0.05	ND(0.0050) J													
Isobutanol	ICAL RRF	0.006	>0.05	ND(2.5) J													
Methylene Chloride	CCAL %D	37.8%	<25%	ND(0.0050) J													
Propionitrile	ICAL RRF	0.017	>0.05	ND(1.0) J													
G135-276	16-2-W3	1/16/2007	Solid	Tier II	Yes							1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(5.0) J	16-1-W4
												2-Butanone	CCAL %D	25.6%	<25%	ND(0.0050) J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.025) J							
						2-Hexanone	CCAL %D	29.7%	<25%	ND(0.0050) J							
						2-Hexanone	LCS %R	58.2%	61.2% to 139%	ND(0.0050) J							
						4-Methyl-2-pentanone	CCAL %D	36.2%	<25%	ND(0.0050) J							
						4-Methyl-2-pentanone	LCS %R	59.6%	65.1% to 135%	ND(0.0050) J							
						Acetone	CCAL %D	26.5%	<25%	0.019 J							
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(1.0) J							
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.061) J							
						Acrolein	CCAL %D	25.6%	<25%	ND(0.061) J							
						Chloroethane	CCAL %D	100.0%	<25%	ND(0.0050) J							
						Chloroethane	CCAL RRF	0.000	>0.05	ND(0.0050) J							
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.5) J							
						Methylene Chloride	CCAL %D	37.8%	<25%	ND(0.0050) J							
						Propionitrile	ICAL RRF	0.017	>0.05	ND(1.0) J							
						G135-276	16-Dup-1	1/16/2007	Solid	Tier II	Yes	1,1,1,2-Tetrachloroethane	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J	16-1-W4
												1,1,2-Trichloroethane	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J	
1,2-Dibromoethane	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J													
1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(5.1) J													

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes						
<b>VOCs cont.</b>																	
G135-276	16-Dup-1	1/16/2007	Solid	Tier II	Yes	2-Butanone	CCAL %D	25.6%	<25%	ND(0.0051) J							
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.026) J							
						2-Hexanone	CCAL %D	29.7%	<25%	ND(0.0051) J							
						2-Hexanone	LCS %R	58.2%	61.2% to 139%	ND(0.0051) J							
						2-Hexanone	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J							
						4-Methyl-2-pentanone	CCAL %D	36.2%	<25%	ND(0.0051) J							
						4-Methyl-2-pentanone	LCS %R	59.6%	65.1% to 135%	ND(0.0051) J							
						Acetone	CCAL %D	26.5%	<25%	0.023 J							
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(1.0) J							
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.063) J							
						Acrolein	CCAL %D	25.6%	<25%	ND(0.063) J							
						Bromofom	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J							
						Chlorobenzene	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J							
						Chloroethane	CCAL %D	100.0%	<25%	ND(0.0051) J							
						Chloroethane	CCAL RRF	0.000	>0.05	ND(0.0051) J							
						Dibromochloromethane	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J							
						Ethyl Methacrylate	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J							
						Ethylbenzene	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J							
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.6) J							
						Methylene Chloride	CCAL %D	37.8%	<25%	ND(0.0051) J							
						Propionitrile	ICAL RRF	0.017	>0.05	ND(1.0) J							
						Styrene	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J							
						Tetrachloroethene	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J							
						Toluene	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J							
						trans-1,3-Dichloropropene	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J							
						Xylenes (total)	Internal Standard Chlorobenzene-d5 %R	42.7%	50% to 200%	ND(0.0051) J							
						G135-277	16-2-F1	1/17/2007	Solid	Tier II	Yes	1,1,1,2-Tetrachloroethane	MS/MSD %R	53.1%, 50.2%	70.4% to 136%	ND(0.0048) J	
1,1,2,2-Tetrachloroethane	MS/MSD %R	1.8%, 2.0%	68.8% to 175%	R													
1,1,2-Trichloroethane	MS/MSD %R	11.2%, 11.1%	84.9% to 139%	ND(0.0048) J													
1,2,3-Trichloropropane	MS/MSD %R	27.2%, 26.2%	55.1% to 197%	ND(0.0048) J													
1,2-Dibromo-3-chloropropane	MS/MSD %R	10.3%, 8.4%	43.4% to 229%	R													
1,2-Dibromoethane	MS/MSD %R	65.3%, 65.2%	78.3% to 148%	ND(0.0048) J													
1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.8) J													
2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.024) J													
2-Hexanone	LCS %R	50.0%	61.2% to 139%	ND(0.0048) J													
4-Methyl-2-pentanone	CCAL %D	25.1%	<25%	ND(0.0048) J													
4-Methyl-2-pentanone	LCS %R	58.8%	65.1% to 135%	ND(0.0048) J													
Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.96) J													
Acrolein	ICAL RRF	0.039	>0.05	ND(0.059) J													
Bromodichloromethane	MS/MSD %R	55.5%, 51.0%	77.4% to 140%	ND(0.0048) J													
Bromofom	MS/MSD %R	53.3%, 51.9%	74.7% to 161%	ND(0.0048) J													
Carbon Disulfide	MS/MSD %R	53.1%, 50.7%	64.3% to 145%	ND(0.0048) J													
Chlorobenzene	MS/MSD %R	62.4%, 59.8%	66.3% to 135%	ND(0.0048) J													
Chloroethane	CCAL %D	100.0%	<25%	ND(0.0048) J													
Chloroethane	CCAL RRF	0.000	>0.05	ND(0.0048) J													
Chlorofom	MS/MSD %R	55.5%, 51.0%	71.1% to 143%	ND(0.0048) J													
Dibromochloromethane	MS/MSD %R	47.8%, 45.2%	78.1% to 141%	ND(0.0048) J													
Dibromomethane	CCAL %D	27.4%	<25%	ND(0.0048) J													
Isobutanol	ICAL RRF	0.006	>0.05	ND(2.4) J													
Methylene Chloride	CCAL %D	30.5%	<25%	ND(0.0048) J													
Propionitrile	ICAL RRF	0.017	>0.05	ND(0.96) J													
Styrene	MS/MSD %R	64.6%, 56.8%	65.7% to 133%	ND(0.0048) J													
Tetrachloroethene	MSD %R	59.7%	61.6% to 137%	ND(0.0048) J													
Toluene	MS/MSD %R	36.5%, 0.0%	70.5% to 138%	0.053 J													
G135-277	16-4-W2	1/17/2007	Solid	Tier II	Yes							1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.5) J	
												2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.022) J	
						2-Hexanone	LCS %R	50.0%	61.2% to 139%	ND(0.0045) J							
						4-Methyl-2-pentanone	CCAL %D	25.1%	<25%	ND(0.0045) J							
						4-Methyl-2-pentanone	LCS %R	58.8%	65.1% to 135%	ND(0.0045) J							
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.89) J							
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.055) J							
						Chloroethane	CCAL %D	100.0%	<25%	ND(0.0045) J							
						Chloroethane	CCAL RRF	0.000	>0.05	ND(0.0045) J							
						Dibromomethane	CCAL %D	27.4%	<25%	ND(0.0045) J							

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
<b>VOCs cont.</b>											
G135-277	16-4-W2	1/17/2007	Solid	Tier II	Yes	Isobutanol	ICAL RRF	0.006	>0.05	ND(2.2) J	
						Methylene Chloride	CCAL %D	30.5%	<25%	ND(0.0045) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.89) J	
G135-277	16-4-W4	1/17/2007	Solid	Tier II	Yes	1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(5.2) J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.026) J	
						2-Hexanone	LCS %R	50.0%	61.2% to 139%	ND(0.0052) J	
						4-Methyl-2-pentanone	CCAL %D	25.1%	<25%	ND(0.0052) J	
						4-Methyl-2-pentanone	LCS %R	58.8%	65.1% to 135%	ND(0.0052) J	
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(1.1) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.065) J	
						Chloroethane	CCAL %D	100.0%	<25%	ND(0.0052) J	
						Chloroethane	CCAL RRF	0.000	>0.05	ND(0.0052) J	
						Dibromomethane	CCAL %D	27.4%	<25%	ND(0.0052) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.6) J	
						Methylene Chloride	CCAL %D	30.5%	<25%	ND(0.0052) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(1.1) J	
G135-281	11-1-W2	1/24/2007	Solid	Tier II	Yes	1,2-Dichloroethane	CCAL %D	26.7%	<25%	ND(0.0044) J	
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.4) J	
						2-Butanone	CCAL %D	32.0%	<25%	ND(0.0044) J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.022) J	
						2-Hexanone	LCS %R	57.9%	61.2% to 139%	ND(0.0044) J	
						4-Methyl-2-pentanone	LCS %R	60.2%	65.1% to 135%	ND(0.0044) J	
						Acetone	CCAL %D	46.0%	<25%	0.027 J	
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.88) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.054) J	
						Acrolein	CCAL %D	38.5%	<25%	ND(0.054) J	
						Acrylonitrile	CCAL %D	41.5%	<25%	ND(0.044) J	
						Bromomethane	CCAL %D	37.4%	<25%	ND(0.0044) J	
						Chloromethane	CCAL %D	29.1%	<25%	ND(0.0044) J	
						Dichlorodifluoromethane	CCAL %D	31.1%	<25%	ND(0.0044) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.2) J	
						Methylene Chloride	CCAL %D	32.0%	<25%	ND(0.0044) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.88) J	
						Styrene	LCS %R	79.4%	82.7% to 117%	ND(0.0044) J	
						Trichlorofluoromethane	CCAL %D	32.0%	<25%	ND(0.0044) J	
G135-281	11-1-W5	1/24/2007	Solid	Tier II	Yes	1,2-Dichloroethane	CCAL %D	26.7%	<25%	ND(0.0047) J	
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.7) J	
						2-Butanone	CCAL %D	32.0%	<25%	ND(0.0047) J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.023) J	
						2-Hexanone	LCS %R	57.9%	61.2% to 139%	ND(0.0047) J	
						4-Methyl-2-pentanone	LCS %R	60.2%	65.1% to 135%	ND(0.0047) J	
						Acetone	CCAL %D	46.0%	<25%	0.019 J	
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.94) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.058) J	
						Acrolein	CCAL %D	38.5%	<25%	ND(0.058) J	
						Acrylonitrile	CCAL %D	41.5%	<25%	ND(0.047) J	
						Bromomethane	CCAL %D	37.4%	<25%	ND(0.0047) J	
						Chloromethane	CCAL %D	29.1%	<25%	ND(0.0047) J	
						Dichlorodifluoromethane	CCAL %D	31.1%	<25%	ND(0.0047) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.3) J	
						Methylene Chloride	CCAL %D	32.0%	<25%	ND(0.0047) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.94) J	
						Styrene	LCS %R	79.4%	82.7% to 117%	ND(0.0047) J	
						Trichlorofluoromethane	CCAL %D	32.0%	<25%	ND(0.0047) J	
G135-281	11-1-W8	1/24/2007	Solid	Tier II	Yes	1,2-Dichloroethane	CCAL %D	26.7%	<25%	ND(0.0047) J	
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.7) J	
						2-Butanone	CCAL %D	32.0%	<25%	ND(0.0047) J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.024) J	
						2-Hexanone	LCS %R	57.9%	61.2% to 139%	ND(0.0047) J	
						4-Methyl-2-pentanone	LCS %R	60.2%	65.1% to 135%	ND(0.0047) J	
						Acetone	CCAL %D	46.0%	<25%	0.018 J	
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.94) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.058) J	
						Acrolein	CCAL %D	38.5%	<25%	ND(0.058) J	

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
<b>VOCs cont.</b>											
G135-281	11-1-W8	1/24/2007	Solid	Tier II	Yes	Acrylonitrile	CCAL %D	41.5%	<25%	ND(0.047) J	
						Bromomethane	CCAL %D	37.4%	<25%	ND(0.0047) J	
						Chloromethane	CCAL %D	29.1%	<25%	ND(0.0047) J	
						Dichlorodifluoromethane	CCAL %D	31.1%	<25%	ND(0.0047) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.4) J	
						Methylene Chloride	CCAL %D	32.0%	<25%	ND(0.0047) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.94) J	
						Styrene	LCS %R	79.4%	82.7% to 117%	ND(0.0047) J	
G135-281	11-Dup-2	1/24/2007	Solid	Tier II	Yes	Trichlorofluoromethane	CCAL %D	32.0%	<25%	ND(0.0047) J	
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(5.0) J	11-1-W2
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.025) J	
						2-Hexanone	LCS %R	60.7%	61.2% to 139%	ND(0.0050) J	
						4-Methyl-2-pentanone	LCS %R	49.8%	65.1% to 135%	ND(0.0050) J	
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.99) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.061) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.5) J	
G135-281	RB-012407-1	1/24/2007	Water	Tier II	Yes	Methylene Chloride	CCAL %D	39.0%	<25%	ND(0.0050) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.99) J	
						1,2-Dibromo-3-chloropropane	ICAL RRF	0.028	>0.05	ND(0.0050) J	
						2-Chloroethylvinylether	ICAL RRF	0.013	>0.05	ND(0.013) J	
						Acetone	ICAL RRF	0.031	>0.05	ND(0.0050) J	
						Acetone	CCAL %D	25.8%	<25%	ND(0.0050) J	
						Acrolein	ICAL RRF	0.020	>0.05	ND(0.025) J	
						Acrolein	CCAL %D	30.0%	<25%	ND(0.025) J	
G135-282	11-2-F2	1/23/2007	Solid	Tier II	Yes	Acrylonitrile	ICAL RRF	0.039	>0.05	ND(0.025) J	
						Chloromethane	CCAL %D	27.9%	<25%	ND(0.0010) J	
						Dichlorodifluoromethane	CCAL %D	25.9%	<25%	ND(0.0010) J	
						Trichlorofluoromethane	CCAL %D	32.3%	<25%	ND(0.0010) J	
						1,1,1,2-Tetrachloroethane	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J	
						1,1,2-Trichloroethane	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J	
						1,2-Dibromoethane	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J	
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.4) J	
						2-Butanone	CCAL %D	25.6%	<25%	ND(0.0044) J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.022) J	
						2-Hexanone	CCAL %D	29.7%	<25%	ND(0.0044) J	
						2-Hexanone	LCS %R	58.2%	61.2% to 139%	ND(0.0044) J	
						2-Hexanone	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J	
						4-Methyl-2-pentanone	CCAL %D	36.2%	<25%	ND(0.0044) J	
						4-Methyl-2-pentanone	LCS %R	59.6%	65.1% to 135%	ND(0.0044) J	
						Acetone	CCAL %D	26.5%	<25%	0.030 J	
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.88) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.054) J	
						Acrolein	CCAL %D	25.6%	<25%	ND(0.054) J	
						Bromofom	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J	
						Chlorobenzene	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J	
						Dibromochloromethane	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J	
						Ethyl Methacrylate	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J	
						Ethylbenzene	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.2) J	
						Methylene Chloride	CCAL %D	37.8%	<25%	ND(0.0044) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.88) J	
Styrene	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J							
Tetrachloroethene	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J							
Toluene	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	0.031 J							
trans-1,3-Dichloropropene	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J							
Xylenes (total)	Internal Standard Chlorobenzene-d5 %R	43.2%	50% to 200%	ND(0.0044) J							
G135-282	11-2-W3	1/23/2007	Solid	Tier II	Yes	1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.3) J	
						2-Butanone	CCAL %D	25.6%	<25%	ND(0.0043) J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.021) J	
						2-Hexanone	CCAL %D	29.7%	<25%	ND(0.0043) J	
						2-Hexanone	LCS %R	58.2%	61.2% to 139%	ND(0.0043) J	
						4-Methyl-2-pentanone	CCAL %D	36.2%	<25%	ND(0.0043) J	
4-Methyl-2-pentanone	LCS %R	59.6%	65.1% to 135%	ND(0.0043) J							
Acetone	CCAL %D	26.5%	<25%	0.014 J							

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
<b>VOCs cont.</b>											
G135-282	11-2-W3	1/23/2007	Solid	Tier II	Yes	Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.86) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.053) J	
						Acrolein	CCAL %D	25.6%	<25%	ND(0.053) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.1) J	
						Methylene Chloride	CCAL %D	37.8%	<25%	ND(0.0043) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.86) J	
G135-282	11-2-W4	1/23/2007	Solid	Tier II	Yes	1,1,1,2-Tetrachloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						1,1,1,2-Tetrachloroethane	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J	
						1,1,1-Trichloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						1,1,2,2-Tetrachloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						1,1,2-Trichloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						1,1,2-Trichloroethane	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J	
						1,1-Dichloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						1,1-Dichloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						1,2,3-Trichloropropane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						1,2-Dibromo-3-chloropropane	Surrogate Recovery	45.0%	49% to 151%	ND(0.022) J	
						1,2-Dibromoethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						1,2-Dibromoethane	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J	
						1,2-Dichloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						1,2-Dichloropropane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.4) J	
						1,4-Dioxane	Surrogate Recovery	45.0%	49% to 151%	ND(4.4) J	
						2-Butanone	CCAL %D	25.6%	<25%	ND(0.0044) J	
						2-Butanone	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						2-Chloro-1,3-butadiene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.022) J	
						2-Chloroethylvinylether	Surrogate Recovery	45.0%	49% to 151%	ND(0.022) J	
						2-Hexanone	CCAL %D	29.7%	<25%	ND(0.0044) J	
						2-Hexanone	LCS %R	58.2%	61.2% to 139%	ND(0.0044) J	
						2-Hexanone	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						2-Hexanone	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J	
						3-Chloropropene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						4-Methyl-2-pentanone	CCAL %D	36.2%	<25%	ND(0.0044) J	
						4-Methyl-2-pentanone	LCS %R	59.6%	65.1% to 135%	ND(0.0044) J	
						4-Methyl-2-pentanone	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Acetone	CCAL %D	26.5%	<25%	ND(0.0044) J	
						Acetone	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.87) J	
						Acetonitrile	Surrogate Recovery	45.0%	49% to 151%	ND(0.87) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.054) J	
						Acrolein	CCAL %D	25.6%	<25%	ND(0.054) J	
						Acrolein	Surrogate Recovery	45.0%	49% to 151%	ND(0.054) J	
						Acrylonitrile	Surrogate Recovery	45.0%	49% to 151%	ND(0.044) J	
						Benzene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Bromodichloromethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Bromoform	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Bromoform	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J	
						Bromomethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Carbon Disulfide	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Carbon Tetrachloride	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Chlorobenzene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Chlorobenzene	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J	
						Chloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Chloroform	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Chloromethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						cis-1,3-Dichloropropene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Dibromochloromethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Dibromochloromethane	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J	
						Dibromomethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Dichlorodifluoromethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Ethyl Methacrylate	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Ethyl Methacrylate	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J	
						Ethylbenzene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Ethylbenzene	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J	

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
<b>VOCs cont.</b>											
G135-282	11-2-W4	1/23/2007	Solid	Tier II	Yes	Iodomethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.2) J	
						Isobutanol	Surrogate Recovery	45.0%	49% to 151%	ND(2.2) J	
						Methacrylonitrile	Surrogate Recovery	45.0%	49% to 151%	ND(0.44) J	
						Methyl Methacrylate	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Methylene Chloride	CCAL %D	37.8%	<25%	ND(0.0044) J	
						Methylene Chloride	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.87) J	
						Propionitrile	Surrogate Recovery	45.0%	49% to 151%	ND(0.87) J	
						Styrene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Styrene	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J	
						Tetrachloroethene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Tetrachloroethene	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J	
						Toluene	Surrogate Recovery	45.0%	49% to 151%	0.0050 J	
						Toluene	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	0.0050 J	
						trans-1,2-Dichloroethene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						trans-1,3-Dichloropropene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						trans-1,3-Dichloropropene	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J	
						trans-1,4-Dichloro-2-butene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0093) J	
						Trichloroethene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Trichlorofluoromethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
						Vinyl Acetate	Surrogate Recovery	45.0%	49% to 151%	ND(0.0087) J	
						Vinyl Chloride	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J	
Xylenes (total)	Surrogate Recovery	45.0%	49% to 151%	ND(0.0044) J							
Xylenes (total)	Internal Standard Chlorobenzene-d5 %R	38.3%	50% to 200%	ND(0.0044) J							
G135-282	11-3-F2	1/23/2007	Solid	Tier II	Yes	1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.7) J	
						2-Butanone	CCAL %D	25.6%	<25%	0.0032 J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.024) J	
						2-Hexanone	CCAL %D	29.7%	<25%	ND(0.0047) J	
						2-Hexanone	LCS %R	58.2%	61.2% to 139%	ND(0.0047) J	
						4-Methyl-2-pentanone	CCAL %D	36.2%	<25%	ND(0.0047) J	
						4-Methyl-2-pentanone	LCS %R	59.6%	65.1% to 135%	ND(0.0047) J	
						Acetone	CCAL %D	26.5%	<25%	0.033 J	
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.94) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.058) J	
						Acrolein	CCAL %D	25.6%	<25%	ND(0.058) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.4) J	
						Methylene Chloride	CCAL %D	37.8%	<25%	ND(0.0047) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(0.94) J	
						G135-282	11-3-W2	1/23/2007	Solid	Tier II	Yes
1,1,1-Trichloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
1,1,2,2-Tetrachloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
1,1,2-Trichloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
1,1-Dichloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
1,1-Dichloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
1,2,3-Trichloropropane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
1,2-Dibromo-3-chloropropane	Surrogate Recovery	45.0%	49% to 151%	ND(0.025) J							
1,2-Dibromoethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
1,2-Dichloroethane	CCAL %D	26.7%	<25%	ND(0.0050) J							
1,2-Dichloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
1,2-Dichloropropane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(5.0) J							
1,4-Dioxane	Surrogate Recovery	45.0%	49% to 151%	ND(5.0) J							
2-Butanone	CCAL %D	32.0%	<25%	ND(0.0050) J							
2-Butanone	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
2-Chloro-1,3-butadiene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.025) J							
2-Chloroethylvinylether	Surrogate Recovery	45.0%	49% to 151%	ND(0.025) J							
2-Hexanone	LCS %R	57.5%	61.2% to 139%	ND(0.0050) J							
2-Hexanone	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
3-Chloropropene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
4-Methyl-2-pentanone	LCS %R	63.3%	65.1% to 135%	ND(0.0050) J							
4-Methyl-2-pentanone	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
Acetone	CCAL %D	46.0%	<25%	ND(0.0050) J							



**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
<b>VOCs cont.</b>											
G135-282	11-3-W2	1/23/2007	Solid	Tier II	Yes	Acetone	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(1.0) J	
						Acetonitrile	Surrogate Recovery	45.0%	49% to 151%	ND(1.0) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.061) J	
						Acrolein	CCAL %D	38.5%	<25%	ND(0.061) J	
						Acrolein	Surrogate Recovery	45.0%	49% to 151%	ND(0.061) J	
						Acrylonitrile	CCAL %D	41.5%	<25%	ND(0.050) J	
						Acrylonitrile	Surrogate Recovery	45.0%	49% to 151%	ND(0.050) J	
						Benzene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Bromodichloromethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Bromoforn	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Bromomethane	CCAL %D	37.4%	<25%	ND(0.0050) J	
						Bromomethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Carbon Disulfide	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Carbon Tetrachloride	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Chlorobenzene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Chloroethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Chloroform	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Chloromethane	CCAL %D	29.1%	<25%	ND(0.0050) J	
						Chloromethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						cis-1,3-Dichloropropene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Dibromochloromethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Dibromomethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Dichlorodifluoromethane	CCAL %D	31.1%	<25%	ND(0.0050) J	
						Dichlorodifluoromethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Ethyl Methacrylate	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Ethylbenzene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Iodomethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.5) J	
						Isobutanol	Surrogate Recovery	45.0%	49% to 151%	ND(2.5) J	
						Methacrylonitrile	Surrogate Recovery	45.0%	49% to 151%	ND(0.50) J	
						Methyl Methacrylate	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Methylene Chloride	CCAL %D	32.0%	<25%	ND(0.0050) J	
						Methylene Chloride	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Propionitrile	ICAL RRF	0.017	>0.05	ND(1.0) J	
						Propionitrile	Surrogate Recovery	45.0%	49% to 151%	ND(1.0) J	
						Styrene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Tetrachloroethene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						Toluene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
						trans-1,2-Dichloroethene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J	
trans-1,3-Dichloropropene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
trans-1,4-Dichloro-2-butene	Surrogate Recovery	45.0%	49% to 151%	ND(0.011) J							
Trichloroethene	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
Trichlorofluoromethane	CCAL %D	32.0%	<25%	ND(0.0050) J							
Trichlorofluoromethane	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
Vinyl Acetate	Surrogate Recovery	45.0%	49% to 151%	ND(0.010) J							
Vinyl Chloride	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
Xylenes (total)	Surrogate Recovery	45.0%	49% to 151%	ND(0.0050) J							
G135-282	11-PH-W1	1/23/2007	Solid	Tier II	Yes	1,2-Dichloroethane	CCAL %D	26.7%	<25%	ND(0.0049) J	
						1,4-Dioxane	ICAL RRF	0.001	>0.05	ND(4.9) J	
						2-Butanone	CCAL %D	32.00%	<25%	ND(0.0049) J	
						2-Chloroethylvinylether	ICAL RRF	0.007	>0.05	ND(0.024) J	
						2-Hexanone	LCS %R	57.5%	61.2% to 139%	ND(0.0049) J	
						4-Methyl-2-pentanone	LCS %R	63.3%	65.1% to 135%	ND(0.0049) J	
						Acetone	CCAL %D	46.0%	<25%	0.021 J	
						Acetonitrile	ICAL RRF	0.011	>0.05	ND(0.97) J	
						Acrolein	ICAL RRF	0.039	>0.05	ND(0.060) J	
						Acrolein	CCAL %D	38.5%	<25%	ND(0.060) J	
						Acrylonitrile	CCAL %D	41.5%	<25%	ND(0.049) J	
						Bromomethane	CCAL %D	37.4%	<25%	ND(0.0049) J	
						Chloromethane	CCAL %D	29.1%	<25%	ND(0.0049) J	
						Dichlorodifluoromethane	CCAL %D	31.1%	<25%	ND(0.0049) J	
						Isobutanol	ICAL RRF	0.006	>0.05	ND(2.4) J	
						Methylene Chloride	CCAL %D	32.0%	<25%	ND(0.0049) J	

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
<b>VOCs cont.</b>											
G135-282	11-PH-W1	1/23/2007	Solid	Tier II	Yes	Propionitrile	ICAL RRF	0.017	>0.05	ND(0.97) J	
						Trichlorofluoromethane	CCAL %D	32.0%	<25%	ND(0.0049) J	
G135-286	16-4-F1	1/29/2007	Solid	Tier II	Yes	1,2-Dibromo-3-chloropropane	LCS %R	16.5%	67.4% to 133%	ND(0.022) J	
						1,4-Dioxane	ICAL RRF	0.000	>0.05	ND(4.4) J	
						2-Chloroethylvinylether	LCS %R	0.0%	10.0% to 1020%	R	
						2-Hexanone	LCS %R	48.0%	61.2% to 139%	ND(0.0044) J	
						4-Methyl-2-pentanone	LCS %R	53.7%	65.1% to 135%	ND(0.0044) J	
						Acetonitrile	ICAL RRF	0.005	>0.05	ND(0.88) J	
						Acrolein	CCAL %D	27.3%	<25%	ND(0.054) J	
						Methyl Methacrylate	ICAL RRF	0.042	>0.05	ND(0.0044) J	
						Propionitrile	ICAL RRF	0.005	>0.05	ND(0.88) J	
						trans-1,4-Dichloro-2-butene	LCS %R	18.3%	69.5% to 130%	ND(0.0094) J	
<b>SVOCs</b>											
G135-275	16-3-F1	1/18/2007	Solid	Tier II	Yes	2,4,5-Trichlorophenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4,6-Trichlorophenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dinitrophenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dimethylphenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dichlorophenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,6-Dichlorophenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Chlorophenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Methylphenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Nitrophenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						3&4-Methylphenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Chloro-3-Methylphenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Nitrophenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.62) J	
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.5) J	
						Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J	
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.62) J	
						Benzidine	CCAL %D	91.8%	<25%	ND(0.62) J	
						Pentachlorophenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						Phenol	Surrogate Recovery Acid	0.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
G135-275	16-3-W1	1/18/2007	Solid	Tier II	Yes	2,4,5-Trichlorophenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						2,4,6-Trichlorophenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						2,4-Dinitrophenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						2,4-Dimethylphenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						2,4-Dichlorophenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						2,6-Dichlorophenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						2-Chlorophenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						2-Methylphenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						2-Nitrophenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						3&4-Methylphenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						4-Chloro-3-Methylphenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						4-Nitrophenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.62) J	
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J	
						Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J	
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.62) J	
						Benzidine	CCAL %D	91.8%	<25%	ND(0.62) J	
						Pentachlorophenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
						Phenol	Surrogate Recovery Acid	0.1%	41% to 129%	R	
G135-275	16-3-W3	1/18/2007	Solid	Tier II	Yes	4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.59) J	
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.5) J	
						Aramite	ICAL RRF	0.003	>0.05	ND(0.30) J	
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.59) J	
						Benzidine	CCAL %D	91.8%	<25%	ND(0.59) J	
G135-275	RinseBlank-1	1/18/2007	Water	Tier II	Yes	2,4-Dinitrophenol	LCS %R	61.3%	67.0% to 122%	ND(0.050) J	
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.020) J	
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(0.050) J	

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
**(Results are presented in parts per million, ppm)**

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
SVOCs cont.											
G135-275	RinseBlank-1	1/18/2007	Water	Tier II	Yes	Aramite	ICAL RRF	0.003	>0.05	ND(0.010) J	
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.020) J	
						Diallate	CCAL %D	95.7%	<25%	ND(0.010) J	
						Pyridine	LCS %R	0.0%	50.0% to 150%	ND(0.010) J	
G135-276	16-1-W2	1/16/2007	Solid	Tier II	Yes	2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4,5-Trichlorophenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4,6-Trichlorophenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dichlorophenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dimethylphenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dinitrophenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,6-Dichlorophenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Chlorophenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Methylphenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Nitrophenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						3&4-Methylphenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Chloro-3-Methylphenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Nitrophenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.61) J	
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.5) J	
						Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J	
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.61) J	
						Benzo(g,h,i)perylene	LCS %R	0.0%	65.7% to 140%	R	
						Diallate	CCAL %D	95.7%	<25%	ND(0.31) J	
						Indeno(1,2,3-cd)pyrene	LCS %R	26.8%	33.0% to 158%	ND(0.31) J	
						Pentachlorophenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						Phenol	Surrogate Recovery Acid	1.5%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
G135-276	16-1-W4	1/16/2007	Solid	Tier II	Yes	1,2,4-Trichlorobenzene	MS/MSD RPD	38.7%	<30%	ND(0.33) J	
						1,2-Dichlorobenzene	MS/MSD RPD	39.1%	<30%	ND(0.33) J	
						1,3-Dichlorobenzene	MS/MSD RPD	36.7%	<30%	ND(0.33) J	
						1,4-Dichlorobenzene	MS/MSD RPD	38.8%	<30%	ND(0.33) J	
						2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4,5-Trichlorophenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4,6-Trichlorophenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dichlorophenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dimethylphenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dinitrophenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dinitrotoluene	MS/MSD RPD	42.8%	<30%	ND(0.33) J	
						2,6-Dichlorophenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,6-Dinitrotoluene	MS/MSD RPD	51.8%	<30%	ND(0.33) J	
						2-Chloronaphthalene	MS/MSD RPD	50.2%	<30%	ND(0.33) J	
						2-Chlorophenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Methylnaphthalene	MS/MSD RPD	41.2%	<30%	ND(0.33) J	
						2-Methylphenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Nitroaniline	MS/MSD RPD	42.0%	<30%	ND(0.33) J	
						2-Nitrophenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						3&4-Methylphenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						3,3'-Dichlorobenzidine	MS/MSD RPD	53.8%	<30%	ND(0.66) J	
						4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Bromophenyl-phenylether	MS/MSD RPD	46.1%	<30%	ND(0.33) J	
						4-Chloro-3-Methylphenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Chloroaniline	MS/MSD RPD	37.4%	<30%	ND(1.6) J	
						4-Chlorophenyl-phenylether	MS/MSD RPD	44.8%	<30%	ND(0.33) J	
						4-Nitroaniline	MS/MSD RPD	37.9%	<30%	ND(1.6) J	
						4-Nitrophenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.66) J	
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J	
						Acenaphthene	MS/MSD RPD	43.4%	<30%	ND(0.33) J	
						Acenaphthylene	MS/MSD RPD	44.3%	<30%	ND(0.33) J	
						Anthracene	MS/MSD RPD	45.4%	<30%	ND(0.33) J	
						Aramite	ICAL RRF	0.003	>0.05	ND(0.33) J	
G135-276	16-1-W4	1/16/2007	Solid	Tier II	Yes	Benzidine	ICAL RRF	0.017	>0.05	ND(0.66) J	
						Benzo(a)anthracene	MS/MSD RPD	43.1%	<30%	ND(0.33) J	

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
SVOCs cont.											
G135-276	16-1-W4	1/16/2007	Solid	Tier II	Yes	Benzo(a)pyrene	MS/MSD RPD	44.6%	<30%	ND(0.33) J	
						Benzo(b)fluoranthene	MS/MSD RPD	32.8%	<30%	ND(0.33) J	
						Benzo(g,h,i)perylene	LCS %R	0.0%	65.7% to 140%	R	
						Benzo(k)fluoranthene	MS/MSD RPD	38.5%	<30%	ND(0.33) J	
						Benzyl Alcohol	MS/MSD RPD	39.1%	<30%	ND(0.66) J	
						bis(2-Chloroethoxy)methane	MS/MSD RPD	40.9%	<30%	ND(0.33) J	
						bis(2-Chloroethyl)ether	MS/MSD RPD	38.3%	<30%	ND(0.33) J	
						bis(2-Chloroisopropyl)ether	MS/MSD RPD	38.6%	<30%	ND(0.33) J	
						bis(2-Ethylhexyl)phthalate	MS/MSD RPD	48.5%	<30%	ND(0.33) J	
						Butylbenzylphthalate	MS/MSD RPD	39.8%	<30%	ND(0.33) J	
						Chrysene	MS/MSD RPD	49.3%	<30%	ND(0.33) J	
						Dibenzo(a,h)anthracene	MS/MSD RPD	81.9%	<30%	ND(0.33) J	
						Dibenzofuran	MS/MSD RPD	43.3%	<30%	ND(0.33) J	
						Diethylphthalate	MS/MSD RPD	45.6%	<30%	ND(0.33) J	
						Di-n-Butylphthalate	MS/MSD RPD	48.0%	<30%	ND(0.33) J	
						Diphenylamine	MS/MSD RPD	45.5%	<30%	ND(0.33) J	
						Fluoranthene	MS/MSD RPD	49.3%	<30%	ND(0.33) J	
						Fluorene	MS/MSD RPD	44.6%	<30%	ND(0.33) J	
						Hexachlorobenzene	MS/MSD RPD	46.1%	<30%	ND(0.33) J	
						Hexachlorobutadiene	MS/MSD RPD	35.6%	<30%	ND(0.33) J	
						Hexachloroethane	MS/MSD RPD	36.6%	<30%	ND(0.33) J	
						Indeno(1,2,3-cd)pyrene	MS/MSD RPD	72.6%	<30%	ND(0.33) J	
						Indeno(1,2,3-cd)pyrene	LCS %R	26.8%	33.0% to 158%	ND(0.33) J	
						Isophorone	MS/MSD RPD	41.0%	<30%	ND(0.33) J	
						Naphthalene	MS/MSD RPD	40.4%	<30%	ND(0.33) J	
						Nitrobenzene	MS/MSD RPD	38.3%	<30%	ND(0.33) J	
						N-Nitroso-di-n-propylamine	MS/MSD RPD	49.5%	<30%	ND(0.33) J	
						Pentachlorophenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						Phenanthrene	MS/MSD RPD	46.8%	<30%	0.039 J	
						Phenol	Surrogate Recovery Acid	0.4%, 4.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						Pyrene	MS/MSD RPD	35.7%	<30%	ND(0.33) J	
						Pyridine	MS/MSD RPD	30.4%	<30%	ND(0.33) J	
						G135-276	16-1-W7	1/16/2007	Solid	Tier II	Yes
2,4,5-Trichlorophenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4,6-Trichlorophenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4-Dichlorophenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4-Dimethylphenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4-Dinitrophenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,6-Dichlorophenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2-Chlorophenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2-Methylphenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2-Nitrophenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
3&4-Methylphenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
4-Chloro-3-Methylphenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
4-Nitrophenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.63) J							
a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J							
Aramite	ICAL RRF	0.003	>0.05	ND(0.32) J							
Benzidine	ICAL RRF	0.017	>0.05	ND(0.63) J							
Benzo(g,h,i)perylene	LCS %R	0.0%	65.7% to 140%	R							
Diallate	CCAL %D	95.7%	<25%	ND(0.32) J							
Indeno(1,2,3-cd)pyrene	LCS %R	26.8%	33.0% to 158%	ND(0.32) J							
Pentachlorophenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
Phenol	Surrogate Recovery Acid	1.3%, 0.2%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
G135-276	16-2-W2	1/16/2007	Solid	Tier II	Yes	2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4,5-Trichlorophenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4,6-Trichlorophenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dichlorophenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dimethylphenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dinitrophenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,6-Dichlorophenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes						
SVOCs cont.																	
G135-276	16-2-W2	1/16/2007	Solid	Tier II	Yes	2-Chlorophenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2-Methylphenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2-Nitrophenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						3&4-Methylphenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						4-Chloro-3-Methylphenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						4-Nitrophenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.63) J							
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J							
						Aramite	ICAL RRF	0.003	>0.05	ND(0.32) J							
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.63) J							
						Benzo(g,h,i)perylene	LCS %R	0.0%	65.7% to 140%	R							
						Diallate	CCAL %D	95.7%	<25%	ND(0.32) J							
						Indeno(1,2,3-cd)pyrene	LCS %R	26.8%	33.0% to 158%	ND(0.32) J							
						Pentachlorophenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						Phenol	Surrogate Recovery Acid	0.3%, 0.6%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						G135-276	16-2-W3	1/16/2007	Solid	Tier II	Yes	2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
												2,4,5-Trichlorophenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
												2,4,6-Trichlorophenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
												2,4-Dichlorophenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
2,4-Dimethylphenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2,4-Dinitrophenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2,6-Dichlorophenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2-Chlorophenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2-Methylphenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2-Nitrophenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
3&4-Methylphenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
4-Chloro-3-Methylphenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
4-Nitrophenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.63) J													
a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J													
Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J													
Benzidine	ICAL RRF	0.017	>0.05	ND(0.63) J													
Benzo(g,h,i)perylene	LCS %R	0.0%	65.7% to 140%	R													
Diallate	CCAL %D	95.7%	<25%	ND(0.31) J													
Indeno(1,2,3-cd)pyrene	LCS %R	26.8%	33.0% to 158%	ND(0.31) J													
Pentachlorophenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
Phenol	Surrogate Recovery Acid	0.8%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
G135-276	16-Dup-1	1/16/2007	Solid	Tier II	Yes	2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	16-1-W4						
						2,4,5-Trichlorophenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2,4,6-Trichlorophenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2,4-Dichlorophenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2,4-Dimethylphenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2,4-Dinitrophenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2,6-Dichlorophenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2-Chlorophenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2-Methylphenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2-Nitrophenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						3&4-Methylphenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						4-Chloro-3-Methylphenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						4-Nitrophenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.64) J							
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J							
						Aramite	ICAL RRF	0.003	>0.05	ND(0.32) J							
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.64) J							
						Benzo(g,h,i)perylene	LCS %R	0.0%	65.7% to 140%	R							
						Diallate	CCAL %D	95.7%	<25%	ND(0.32) J							
Indeno(1,2,3-cd)pyrene	LCS %R	26.8%	33.0% to 158%	ND(0.32) J													
Pentachlorophenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
Phenol	Surrogate Recovery Acid	0.4%, 1.7%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
G135-277	16-2-F1	1/17/2007	Solid	Tier II	Yes	2,4,5-Trichlorophenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2,4,6-Trichlorophenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
SVOCs cont.											
G135-277	16-2-F1	1/17/2007	Solid	Tier II	Yes	2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dichlorophenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dimethylphenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dinitrophenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,6-Dichlorophenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Chlorophenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Methylphenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Nitrophenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						3&4-Methylphenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Chloro-3-Methylphenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Nitrophenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.62) J	
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J	
						Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J	
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.62) J	
						Benzidine	CCAL %D	91.8%	<25%	ND(0.62) J	
						Pentachlorophenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						Phenol	Surrogate Recovery Acid	1.3%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						G135-277	16-4-W2	1/17/2007	Solid	Tier II	Yes
2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4,6-Trichlorophenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4-Dichlorophenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4-Dimethylphenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4-Dinitrophenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,6-Dichlorophenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2-Chlorophenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2-Methylphenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2-Nitrophenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
3&4-Methylphenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
4-Chloro-3-Methylphenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
4-Nitrophenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.62) J							
a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J							
Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J							
Benzidine	ICAL RRF	0.017	>0.05	ND(0.62) J							
Benzidine	CCAL %D	91.8%	<25%	ND(0.62) J							
Pentachlorophenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
Phenol	Surrogate Recovery Acid	1.5%, 0.3%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
G135-277	16-4-W4	1/17/2007	Solid	Tier II	Yes	4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.66) J	
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J	
						Aramite	ICAL RRF	0.003	>0.05	ND(0.33) J	
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.66) J	
						Benzidine	CCAL %D	91.8%	<25%	ND(0.66) J	
						4-Nitroquinoline-1-oxide	CCAL %D	25.50%	<25%	ND(1.6) J	
G135-281	11-1-W2	1/24/2007	Solid	Tier II	Yes	4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.62) J	
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J	
						Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J	
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.62) J	
						Diallate	CCAL %D	78.20%	<25%	ND(0.31) J	
						Dibenzo(a,h)anthracene	CCAL %D	25.40%	<25%	ND(0.31) J	
						Hexachlorophene	CCAL %D	28.60%	<25%	ND(0.31) J	
						Methapyrilene	CCAL %D	28.30%	<25%	ND(0.31) J	
						2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R	
						2,4,5-Trichlorophenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R	
G135-281	11-1-W5	1/24/2007	Solid	Tier II	Yes	2,4,6-Trichlorophenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R	
						2,4-Dichlorophenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R	
						2,4-Dimethylphenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R	
						2,4-Dinitrophenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R	
						2,6-Dichlorophenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R	
						2-Chlorophenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R	
						2-Methylphenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R	
						2-Nitrophenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R	

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
**(Results are presented in parts per million, ppm)**

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes						
SVOCs cont.																	
G135-281	11-1-W5	1/24/2007	Solid	Tier II	Yes	3&4-Methylphenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R							
						4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R							
						4-Chloro-3-Methylphenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R							
						4-Nitrophenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R							
						4-Nitroquinoline-1-oxide	CCAL %D	25.50%	<25%	ND(1.6) J							
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.63) J							
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J							
						Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J							
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.63) J							
						Diallate	CCAL %D	78.20%	<25%	ND(0.31) J							
						Dibenzo(a,h)anthracene	CCAL %D	25.40%	<25%	ND(0.31) J							
						Hexachlorophene	CCAL %D	28.60%	<25%	ND(0.31) J							
						Methapyrilene	CCAL %D	28.30%	<25%	ND(0.31) J							
						Pentachlorophenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R							
						Phenol	Surrogate Recovery Acid	40.0%, 9.9%	42% to 123%, 41% to 129%	R							
						G135-281	11-1-W8	1/24/2007	Solid	Tier II	Yes	2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
												2,4,5-Trichlorophenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
2,4,6-Trichlorophenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2,4-Dichlorophenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2,4-Dimethylphenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2,4-Dinitrophenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2,6-Dichlorophenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2-Chlorophenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2-Methylphenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2-Nitrophenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
3&4-Methylphenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
4-Chloro-3-Methylphenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
4-Nitrophenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
4-Nitroquinoline-1-oxide	CCAL %D	25.50%	<25%	ND(1.6) J													
4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.65) J													
a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J													
Aramite	ICAL RRF	0.003	>0.05	ND(0.33) J													
Benzidine	ICAL RRF	0.017	>0.05	ND(0.65) J													
Diallate	CCAL %D	78.20%	<25%	ND(0.33) J													
Dibenzo(a,h)anthracene	CCAL %D	25.40%	<25%	ND(0.33) J													
Hexachlorophene	CCAL %D	28.60%	<25%	ND(0.33) J													
Methapyrilene	CCAL %D	28.30%	<25%	ND(0.33) J													
Pentachlorophenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
Phenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
G135-281	11-Dup-2	1/24/2007	Solid	Tier II	Yes	4-Nitroquinoline-1-oxide	CCAL %D	25.50%	<25%	ND(1.6) J	11-1-W2						
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.63) J							
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J							
						Aramite	ICAL RRF	0.003	>0.05	ND(0.32) J							
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.63) J							
						Diallate	CCAL %D	78.20%	<25%	ND(0.32) J							
						Dibenzo(a,h)anthracene	CCAL %D	25.40%	<25%	ND(0.32) J							
						Hexachlorophene	CCAL %D	28.60%	<25%	ND(0.32) J							
						Methapyrilene	CCAL %D	28.30%	<25%	ND(0.32) J							
						Pentachlorophenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						Phenol	Surrogate Recovery Acid	1.1%, 5.1%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
G135-281	RB-012407-1	1/24/2007	Water	Tier II	Yes	4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.020) J							
						a,a'-Dimethylphenethylamine	CCAL %D	28.60%	<25%	ND(0.050) J							
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(0.050) J							
						Aramite	ICAL RRF	0.003	>0.05	ND(0.010) J							
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.020) J							
						Diallate	CCAL %D	73.90%	<25%	ND(0.010) J							
						Hexachlorocyclopentadiene	CCAL %D	45.80%	<25%	ND(0.020) J							
						Hexachloroethane	LCS %R	0.0%	17.7% to 86.1%	R							
						Pyridine	LCS %R	0.0%	50.0% to 150%	R							
						2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
G135-282	11-2-F2	1/23/2007	Solid	Tier II	Yes	2,4,5-Trichlorophenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2,4,6-Trichlorophenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2,4-Dichlorophenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2,4-Dimethylphenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2,4-Dinitrophenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						2,4-Dinitrophenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							

**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
SVOCs cont.											
G135-282	11-2-F2	1/23/2007	Solid	Tier II	Yes	2,6-Dichlorophenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Chlorophenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Methylphenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Nitrophenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						3&4-Methylphenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Chloro-3-Methylphenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Nitrophenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Nitroquinoline-1-oxide	CCAL RRF	0.013	>0.05	ND(1.6) J	
						4-Nitroquinoline-1-oxide	CCAL %D	64.7%	<25%	ND(1.6) J	
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.63) J	
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J	
						Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J	
						Aramite	CCAL %D	33.3%	<25%	ND(0.31) J	
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.63) J	
						Benzidine	CCAL %D	94.3%	<25%	ND(0.63) J	
						Benzo(g,h,i)perylene	CCAL %D	100.0%	<25%	ND(0.31) J	
						Benzo(g,h,i)perylene	CCAL RRF	0.000	>0.05	ND(0.31) J	
						Diallate	CCAL %D	85.6%	<25%	ND(0.31) J	
						Dibenzo(a,h)anthracene	CCAL %D	95.5%	<25%	ND(0.31) J	
						Dibenzo(a,h)anthracene	CCAL RRF	0.021	>0.05	ND(0.31) J	
						Hexachlorophene	CCAL %D	49.2%	<25%	ND(0.31) J	
						Hexachlorophene	CCAL RRF	0.032	>0.05	ND(0.31) J	
Methapyrene	CCAL %D	25.3%	<25%	ND(0.31) J							
Pentachlorophenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
Phenol	Surrogate Recovery Acid	1.4%, 0.5%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
G135-282	11-2-W3	1/23/2007	Solid	Tier II	Yes	3&4-Methylphenol	CCAL %D	91.3%	<25%	ND(0.31) J	
						4-Nitroquinoline-1-oxide	CCAL RRF	0.021	>0.05	ND(1.6) J	
						4-Nitroquinoline-1-oxide	CCAL %D	60.8%	<25%	ND(1.6) J	
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.62) J	
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J	
						a,a'-Dimethylphenethylamine	CCAL %D	50.00%	<25%	ND(1.6) J	
						Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J	
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.62) J	
						Benzidine	CCAL %D	92.60%	<25%	ND(0.62) J	
						Benzo(g,h,i)perylene	CCAL %D	100.0%	<25%	ND(0.31) J	
						Benzo(g,h,i)perylene	CCAL RRF	0.000	>0.05	ND(0.31) J	
						Diallate	CCAL %D	72.3%	<25%	ND(0.31) J	
						Dibenzo(a,h)anthracene	CCAL %D	96.4%	<25%	ND(0.31) J	
						Dibenzo(a,h)anthracene	CCAL RRF	0.017	>0.05	ND(0.31) J	
						3&4-Methylphenol	CCAL %D	91.3%	<25%	ND(0.31) J	
						4-Nitroquinoline-1-oxide	CCAL RRF	0.021	>0.05	ND(1.6) J	
						G135-282	11-2-W4	1/23/2007	Solid	Tier II	Yes
4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.62) J							
a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J							
a,a'-Dimethylphenethylamine	CCAL %D	50.00%	<25%	ND(1.6) J							
Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J							
Benzidine	ICAL RRF	0.017	>0.05	ND(0.62) J							
Benzidine	CCAL %D	92.60%	<25%	ND(0.62) J							
Benzo(g,h,i)perylene	CCAL %D	100.0%	<25%	ND(0.31) J							
Benzo(g,h,i)perylene	CCAL RRF	0.000	>0.05	ND(0.31) J							
Diallate	CCAL %D	72.3%	<25%	ND(0.31) J							
Dibenzo(a,h)anthracene	CCAL %D	96.4%	<25%	ND(0.31) J							
Dibenzo(a,h)anthracene	CCAL RRF	0.017	>0.05	ND(0.31) J							
2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4,5-Trichlorophenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4,6-Trichlorophenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4-Dichlorophenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4-Dimethylphenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,4-Dinitrophenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2,6-Dichlorophenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2-Chlorophenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2-Methylphenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
2-Nitrophenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							



**TABLE 3 - 1**  
**ANALYTICAL DATA VALIDATION SUMMARY**  
**BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING**  
**EAST STREET AREA 2 - NORTH**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes						
SVOCs cont.																	
G135-282	11-3-F2	1/23/2007	Solid	Tier II	Yes	3&4-Methylphenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						4-Chloro-3-Methylphenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						4-Nitrophenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						4-Nitroquinoline-1-oxide	CCAL RRF	0.021	>0.05	ND(16) J							
						4-Nitroquinoline-1-oxide	CCAL %D	60.8%	<25%	ND(16) J							
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(6.2) J							
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(16) J							
						a,a'-Dimethylphenethylamine	CCAL %D	50.00%	<25%	ND(16) J							
						Aramite	ICAL RRF	0.003	>0.05	ND(3.1) J							
						Benzidine	ICAL RRF	0.017	>0.05	ND(6.2) J							
						Benzidine	CCAL %D	92.60%	<25%	ND(6.2) J							
						Benzo(g,h,i)perylene	CCAL %D	100.0%	<25%	ND(3.1) J							
						Benzo(g,h,i)perylene	CCAL RRF	0.000	>0.05	ND(3.1) J							
						Diallate	CCAL %D	72.3%	<25%	ND(3.1) J							
						Dibenzo(a,h)anthracene	CCAL %D	96.4%	<25%	ND(3.1) J							
						Dibenzo(a,h)anthracene	CCAL RRF	0.017	>0.05	ND(3.1) J							
						Pentachlorophenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						Phenol	Surrogate Recovery Acid	0.0%, 0.0%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R							
						G135-282	11-3-W2	1/23/2007	Solid	Tier II	Yes	4-Nitroquinoline-1-oxide	CCAL RRF	0.038	>0.05	ND(1.6) J	
												4-Nitroquinoline-1-oxide	CCAL %D	25.5%	<25%	ND(1.6) J	
4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.62) J													
a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J													
Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J													
Benzidine	ICAL RRF	0.017	>0.05	ND(0.62) J													
Benzidine	CCAL %D	93.0%	<25%	ND(0.62) J													
Diallate	CCAL %D	78.2%	<25%	ND(0.31) J													
Dibenzo(a,h)anthracene	CCAL %D	25.4%	<25%	ND(0.31) J													
Hexachlorophene	CCAL %D	28.6%	<25%	ND(0.31) J													
Methapyrilene	CCAL %D	28.3%	<25%	ND(0.31) J													
G135-282	11-PH-W1	1/23/2007	Solid	Tier II	Yes							2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(0.32) J	
												2,4,5-Trichlorophenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(0.32) J	
						2,4,6-Trichlorophenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(0.32) J							
						2,4-Dichlorophenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(0.32) J							
						2,4-Dimethylphenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(0.32) J							
						2,4-Dinitrophenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(1.6) J							
						2,6-Dichlorophenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(0.32) J							
						2-Chlorophenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(0.32) J							
						2-Methylphenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(0.32) J							
						2-Nitrophenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(0.32) J							
						3&4-Methylphenol	CCAL %D	91.3%	<25%	ND(0.32) J							
						3&4-Methylphenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(0.32) J							
						4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(1.6) J							
						4-Chloro-3-Methylphenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(0.32) J							
						4-Nitrophenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(1.6) J							
						4-Nitroquinoline-1-oxide	CCAL RRF	0.021	>0.05	ND(1.6) J							
						4-Nitroquinoline-1-oxide	CCAL %D	60.8%	<25%	ND(1.6) J							
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.63) J							
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.6) J							
						a,a'-Dimethylphenethylamine	CCAL %D	50.00%	<25%	ND(1.6) J							
						Aramite	ICAL RRF	0.003	>0.05	ND(0.32) J							
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.63) J							
						Benzidine	CCAL %D	92.60%	<25%	ND(0.63) J							
						Benzo(g,h,i)perylene	CCAL %D	100.0%	<25%	ND(0.32) J							
						Benzo(g,h,i)perylene	CCAL RRF	0.000	>0.05	ND(0.32) J							
						Diallate	CCAL %D	72.3%	<25%	ND(0.32) J							
						Dibenzo(a,h)anthracene	CCAL %D	96.4%	<25%	ND(0.32) J							
						Dibenzo(a,h)anthracene	CCAL RRF	0.017	>0.05	ND(0.32) J							
						Pentachlorophenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(1.6) J							
						Phenol	Surrogate Recovery Acid	35.0%, 11.0%	48% to 125%, 41% to 129%	ND(0.32) J							
						G135-286	16-4-F1	1/29/2007	Solid	Tier II	Yes	2,3,4,6-Tetrachlorophenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
2,4,5-Trichlorophenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2,4,6-Trichlorophenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2,4-Dichlorophenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													
2,4-Dichlorophenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R													

TABLE 3 - 1  
ANALYTICAL DATA VALIDATION SUMMARY  
BUILDINGS 11 & 16 CHARACTERIZATION SAMPLING  
EAST STREET AREA 2 - NORTH  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in parts per million, ppm)

Sample Delivery Group No.	Sample ID	Date Collected	Matrix	Validation Level	Qualification	Compound	QA/QC Parameter	Value	Control Limits	Qualified Result	Notes
SVOCs cont.											
G135-286	16-4-F1	1/29/2007	Solid	Tier II	Yes	2,4-Dimethylphenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,4-Dinitrophenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2,6-Dichlorophenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Chlorophenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Methylphenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						2-Nitrophenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						3&4-Methylphenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4,6-Dinitro-2-methylphenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Chloro-3-Methylphenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Nitrophenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						4-Nitroquinoline-1-oxide	CCAL %D	60.8%	<25%	ND(1.5) J	
						4-Nitroquinoline-1-oxide	CCAL RRF	0.020	>0.05	ND(1.5) J	
						4-Phenylenediamine	ICAL RRF	0.023	>0.05	ND(0.61) J	
						a,a'-Dimethylphenethylamine	ICAL RRF	0.014	>0.05	ND(1.5) J	
						a,a'-Dimethylphenethylamine	CCAL %D	50.0%	<25%	ND(1.5) J	
						Aramite	ICAL RRF	0.003	>0.05	ND(0.31) J	
						Benzidine	ICAL RRF	0.017	>0.05	ND(0.61) J	
						Benzo(g,h,i)perylene	CCAL %D	100.0%	<25%	ND(0.31) J	
						Benzo(g,h,i)perylene	CCAL RRF	0.000	>0.05	ND(0.31) J	
						Diallate	CCAL %D	72.3%	<25%	ND(0.31) J	
						Dibenzo(a,h)anthracene	CCAL RRF	0.017	>0.05	ND(0.31) J	
						Pentachlorophenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	
						Phenol	Surrogate Recovery Acid	0.4%, 3.8%, 0.0%	42% to 123%, 48% to 125%, 41% to 129%	R	

**Attachment 2**

Demonstration of Compliance with  
MDEP's Solid Waste Regulations  
– 310 CMR 19.000

## ATTACHMENT 2

### DEMONSTRATION OF COMPLIANCE WITH SUBSTANTIVE REQUIREMENTS OF MDEP'S SOLID WASTE MANAGEMENT REGULATIONS (310 CMR 19.000)

#### A. INTRODUCTION AND OVERVIEW

The foregoing letter describes the proposed plan of the General Electric Company (GE), in coordination with the Pittsfield Economic Development Authority (PEDA), for the crushing and on-site use of certain building materials (i.e., brick and concrete) generated from the demolition of Buildings 7, 11, 16, 17, 17C, and 19 at GE's Pittsfield facility. As noted in the foregoing letter, the proposed on-site use of these crushed building materials would be performed pursuant to a modification of the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site, which was executed in 1999 by GE, the U.S. Environmental Protection Agency (EPA), the Massachusetts Department of Environmental Protection (MDEP), and other governmental bodies and was entered by the United States District Court for the District of Massachusetts on October 27, 2000. As such, this use would be subject to the on-site permit exemption in Section 121(e)(1) of CERCLA and Paragraph 9.a of the CD and thus would not require any federal, state, or local permits. However, such use must meet the substantive requirements of applicable regulations. This attachment has been prepared to demonstrate that GE's proposed plan would meet the substantive requirements of MDEP's regulations for the beneficial use of solid waste (310 CMR 19.060).

GE transferred two areas of the GE facility, known as the 20s and 30s Complexes, to PEDA in 2005, and plans to transfer another area, known as the 40s Complex, to PEDA in 2008. In addition, GE is preparing to demolish the remaining buildings within an area known as the 19s Complex (i.e., Buildings 11, 16, 17, 17C, and 19), as well as an adjacent building (Building 7) within East Street Area 2-North; and it then intends to transfer the 19s, 20s, 30s, and 40s Complexes to PEDA. The 19s, 20s, 30s, and 40s Complexes are collectively referred to herein as the PEDA Properties.

Based on discussions with PEDA, GE is proposing to EPA that up to approximately 22,500 cubic yards (cy) of certain brick and concrete materials from the demolition of Buildings 7, 11, 16, 17, 17C, and 19 would be crushed, placed, and compacted as backfill or grading material in certain areas of the PEDA Properties (as agreed to by PEDA) and/or in other areas of the GE facility, as described in the foregoing letter. GE, EPA, MDEP, and PEDA previously agreed to a modification of the CD (Fourth Modification of CD, approved by the Court on June 23, 2006) under which similar suitable crushed demolition debris generated from the demolition of buildings in the 30s and 40s Complexes may be used on-site for grading or backfill purposes at the PEDA Properties under certain conditions. (In addition, in 1993, prior to execution of the CD, MDEP granted approval of a beneficial use determination application filed by GE for the demolition and on-site disposition of debris from Buildings 40A, 41, and 41A, formerly located in the 40s Complex.) The currently proposed placement and use of building materials would be authorized by an additional modification to the CD.

This proposed use would meet the substantive requirements of MDEP's beneficial use regulations (310 CMR 19.060). Those regulations contemplate four categories of uses of "secondary materials" (i.e., materials that can be an effective substitute for other materials, in this case soils), as follows:

1. Category 1 – Beneficial Use of Secondary Materials in Commercial Products
2. Category 2 – Beneficial Use of Secondary Materials in Regulated Systems
3. Category 3 – Beneficial Use of Secondary Materials in Restricted Applications
4. Category 4 – Beneficial Use of Secondary Materials in Unrestricted Applications

In this case, Category 1 is not applicable as that category contemplates the manufacturing of products from the secondary material, which is not the application proposed here. Furthermore, Categories 3 and 4 are considered inapplicable as these categories contemplate the use of secondary material in settings

in which such use would introduce new constituents into areas that may not already be subject to regulation. In the present situation, the areas where the crushed building materials would be used are already subject to detailed regulation under the CD, and the placement and use of the materials in those areas would be specifically governed by a modification of the CD. Moreover, following the placement of those materials, the areas where they are placed will be subject to Grants of Environmental Restrictions and Easements (EREs), which will be executed pursuant to the CD, will contain detailed restrictions and requirements governing future activities and uses, and will be enforceable by MDEP as the Grantee. Given this extensive regulatory setting, the category of use that appears to be most applicable to the currently proposed activity is Category 2 – Beneficial Use of Secondary Material in Regulated Systems. This category addresses the use of secondary materials at a facility that is already subject to regulation under an existing permit, approval, or order from MDEP (310 CMR 19.060(15)). Here, the extensive regulation of the subject areas and of the proposed use of crushed material under the CD (to which MDEP is a party) and subsequent EREs (to be administered by MDEP) makes these areas comparable to the regulated facilities covered by Category 2. For example, EPA’s approval of the proposed use of the crushed building material and the CD modification that will authorize it will contain specific requirements relating to the type of building materials that may be placed on-site, the chemical concentrations within those materials, the locations for placement of those materials, the placement of those materials, and the subsequent potential movement of those materials (which would require EPA approval of a specific plan).

MDEP’s beneficial use regulations provide that the beneficial use of secondary material at Category 2 facilities shall be deemed “adequately regulated” for purposes of those regulations provided that: (i) the use is carried out in compliance with the terms of the underlying permit, approval, or order; (ii) any aspect of the proposed use not covered by that permit, approval, or order must be reviewed in accordance with the solid waste management regulations; and (iii) the use of the secondary material “shall be achieved using best management practices that prevent adverse impacts and significant risks to public health, safety and the environment, including, but not limited to, nuisance conditions” (310 CMR 19.060(15)(a)).

The currently proposed on-site use of crushed building materials will be covered by the CD, as modified by the specific CD modification to authorize this use, and will be conducted in compliance with the terms of the CD as so modified. Moreover, as discussed further below, this use will be achieved using best management practices (BMPs) and will not present any “adverse impacts and significant risks to public health, safety and the environment, including, but not limited to, nuisance conditions.” As such, it will meet the pertinent substantive requirements of 310 CMR 19.060.

To support this conclusion, GE presents below in Part B the following information, which is consistent with the Project Information section (Section B) of an Application for Beneficial Use Determination – BWP SW 40 – Regulated Systems:

- 1) A physical and chemical characterization of the secondary material (i.e., crushed demolition debris);
- 2) A general description of the secondary material (visual appearance, matrix, etc.);
- 3) Identification of proposed amounts to be used;
- 4) A description of how the secondary material will be used;
- 5) Identification of the material it is replacing, if applicable, and specifications for use;
- 6) Identification of risk management techniques and BMPs that would prevent adverse impacts and significant risks to public health, safety, and the environment, including nuisance conditions, from use of the secondary material; and
- 7) Identification of the proposed location or types of locations where the secondary material will be used.

Following the presentation of this information, GE demonstrates, in Part C, that the proposed use of crushed building material would not present adverse impacts or significant risks to public health, safety, or the environment.

## B. INFORMATION REGARDING CHARACTERISTICS AND USE OF SECONDARY MATERIAL

### 1. Physical and Chemical Characterization of the Secondary Material

The building materials proposed for on-site use as backfill or grading material will consist solely of brick and concrete building materials (from Buildings 7, 11, 16, 17, 17C, and 19) that have been crushed to a diameter of 2 inches or less. The physical characteristics of these materials are described further in Section B.2 below.

These materials have been characterized for chemical constituents during a number of building material sampling events at these buildings. Building material characterization sampling was conducted both for polychlorinated biphenyls (PCBs) and for other constituents, including the volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and inorganic compounds listed in Appendix IX of 40 CFR Part 264, plus three additional constituents (benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine) (Appendix IX+3). This sampling was conducted using protocols that were based on consideration of the procedures set forth in GE's *Protocols for Building Demolition and Associated Characterization Activities* and its *Soil Cover and Backfill Characterization Plan* (both of which are part of the EPA-approved Project Operations Plan [POP] for the GE-Pittsfield/Housatonic River Site) and that were designed to obtain representative data. To assess whether the data would allow the use of the building demolition debris as backfill/grading material, GE calculated arithmetic average concentrations of PCBs and other constituents in the material proposed for on-site use. The calculation of such arithmetic average concentrations is considered an appropriate method to represent the concentrations of the crushable materials that may be used on-site as backfill/grading material because the sample locations were well distributed and the building materials involved will be mixed and homogenized upon crushing/preparation for use as fill material.

The building materials characterization sampling conducted at Buildings 7, 17, 17C, and 19 was described, and the results were presented, in a letter that GE sent to EPA and MDEP, dated June 26, 2006, titled *Demolition and Disposition Activities – Buildings 7, 17, 17C, and 19*. The data were subsequently re-evaluated to determine the concentrations in the material proposed for on-site use. The results of that re-evaluation were presented in a letter that GE sent to EPA and MDEP, dated May 30, 2007, titled *Revised Plan for Post-Demolition Disposition Activities at Buildings 7, 17, 17C, and 19*. The re-evaluation showed that, after excluding the sample results from the portions of the buildings that will be transported either to GE's Hill 78 On-Plant Consolidation Area (OPCA) or to an appropriate off-site facility for disposition, as well as the data from the slab on-grade floors that will remain in place (anticipated to be subsequently covered with vegetative soil), the average PCB concentration in the remaining materials subject to crushing and on-site use (based on 130 core samples from those materials) is 0.81 ppm. That concentration is far below the applicable Performance Standards set forth in the CD for commercial/industrial areas such as this, which include average PCB concentrations of 25 ppm in the top foot of soil and 200 ppm in the 1-6 foot depth increment. It is also below the Method 1 Category S-1 soil standard of 2 ppm set forth in the Massachusetts Contingency Plan (MCP) for unrestricted (e.g., residential) use and below the CD Performance Standard of 2 ppm for residential areas. In addition, the maximum PCB concentration in that material is 8 ppm, which is far below the "not-to-exceed" (NTE) level of 125 ppm set forth in the CD for the top foot of soil at commercial/industrial properties and is also below the NTE level of 10 ppm set forth in the CD for the top foot at residential properties.

For non-PCB constituents, GE's evaluation of these building materials was conducted in accordance with the procedures described in Attachment F to the *Statement of Work for Removal Actions Outside the River* (SOW) (which is part of the CD). This evaluation included an initial screening step, involving comparison of the maximum concentrations of all detected constituents to the EPA Region 9 residential Preliminary Remediation Goals (PRGs) set forth in Exhibit F-1 to Attachment F of the SOW, which are used as conservative screening values under the CD. All constituents had maximum concentrations below their respective residential PRGs, with the exception of arsenic and lead. For arsenic and lead, the

average concentrations of those constituents in the building materials were found to be well below their corresponding Method 1 Category S-1 soil standards set forth in the MCP.

In addition, GE has reviewed the non-PCB data from Buildings 7, 17, 17C, and 19, using the conservative screening procedure set forth in GE's approved *Waste Characterization Plan* (which is part of the POP) for assessing the potential for materials to be classified as hazardous waste under EPA's Resource Conservation and Recovery Act (RCRA) regulations. This procedure involves dividing the constituent concentrations by 20, changing the units from mg/kg to mg/L, and comparing the results with the allowable concentration limits associated with the Toxicity Characteristic Leaching Procedure (TCLP) under the RCRA regulations. Using this screening procedure, the average concentrations of the non-PCB constituents in the building materials proposed for on-site use would not exceed the TCLP limits. However, to confirm the conclusion that these materials would meet those limits, GE plans to conduct TCLP sampling of these building materials.

The building materials characterization sampling conducted at Buildings 11 and 16 is described, and the results are presented, in the foregoing letter to EPA. That letter also provides an evaluation of the data from the building materials proposed for crushing and on-site use. As shown there, the average PCB concentration in those building materials (based on 33 core samples from those materials) is 1.52 ppm, which is far below the applicable Performance Standards for commercial/industrial properties and is also below the MCP Method 1 soil standard and CD Performance Standard of 2 ppm for residential use. The maximum PCB concentration is 9.5 ppm, which is below the applicable NTE levels of 125 and 10 ppm for commercial/industrial and residential areas, respectively. For non-PCB constituents, the maximum concentrations of all such detected constituents are below their respective residential PRGs, with the exception of arsenic, chromium, and bis(2-ethylhexyl)phthalate; and the average concentrations of those three constituents are below the applicable Method 1 Category S-1 soil standards in the MCP. In addition, as indicated in the foregoing letter, testing of these building materials using the TCLP showed no exceedances of the TCLP limits under EPA's RCRA regulations.

Considering both sets of buildings together, the overall average PCB concentration in the building materials proposed for on-site use (based on averaging the PCB concentrations from the 130 samples from Buildings 7, 17, 17C, and 19 with the 33 samples from Buildings 11 and 16) is 0.956 ppm. Again, this is not only below the applicable CD Performance Standards for commercial/industrial areas, but is also below the MCP Method 1 Category S-1 soil standard for PCBs, which MDEP considers protective for unrestricted use. For the other constituents that were retained following the screening at one or the other of these groups of buildings, the overall average concentrations in the building materials proposed for on-site use are 5.37 ppm for arsenic, 22.4 ppm for chromium, 46.7 ppm for lead, and 1.16 ppm for bis(2-ethylhexyl)phthalate. These average concentrations are below the Method 1 Category S-1 soil standards for these constituents, which are 20 ppm, 30 ppm, 300 ppm, and 200 ppm, respectively. (The Method 1 Category S-2 standards, which would likely apply at commercial/industrial areas, are the same as the Category S-1 standards for arsenic and lead, but are 200 ppm for chromium and 300 ppm for bis(2-ethylhexyl)phthalate.)

## **2. General Description of Secondary Material**

The proposed secondary material will include suitable crushable building demolition debris generated from the above-grade portions of the subject buildings. Material that is not suitable (e.g., wood, steel, sheetrock) will be segregated for either consolidation at GE's Hill 78 OPCA or disposition at an appropriate off-site facility. The material to be segregated for crushing and on-site use will consist solely of brick and concrete building materials. Buildings 7, 17, 17C, and 19 consist primarily of brick along the exterior walls, with very few interior walls and floors; Buildings 11 and 16 consist primarily of brick along the exterior walls, with several interior walls and floors consisting primarily of concrete materials. While the outer portions of the walls are unpainted, several areas of the interior brick and concrete walls are painted. Prior to the demolition of these buildings, GE will remove and containerize loose paint on the building surfaces (i.e., paint that is flaking, peeling, cracking, separated, or otherwise not adequately

adhered to the surfaces); and following completion of these loose paint removal activities, the surrounding floor areas and affected surfaces will be cleaned of loose paint, dirt, and debris.

In addition, Buildings 7, 11, 16, 17, 17C, and 19 have all been previously abated of all known asbestos-containing materials, and have also been removed of all known universal waste (mercury, bulbs, ballasts, batteries, sprinkler heads, CFCs, oils, liquids, etc.) in accordance with applicable federal and state regulations.

### **3. Identification of Proposed Amounts to be Used**

Based on a total combined floor area of approximately 420,000 square feet in Buildings 7, 11, 16, 17, 17C, and 19, as well as visual observations, the overall volume of demolition debris anticipated to be generated from these buildings is approximately 42,000 cy. However, only approximately half of this volume will be subject to crushing and on-site use. Following segregation of non-crushable building materials (e.g., steel and wood), and portions of the buildings corresponding to samples with elevated PCB levels, it is anticipated that up to approximately 22,500 cy of crushed building demolition materials will remain from Buildings 7, 11, 16, 17, 17C, and 19 for on-site use.

### **4. Description of How the Secondary Material Will be Used**

As part of the demolition activities, the secondary material will be segregated (including removal of steel rebar), crushed, transported to the desired location, off-loaded, evenly spread, and compacted. All phases of this operation will be conducted on-site. The brick and concrete demolition debris will be crushed to approximately 2 inches in diameter or less. Several representative composite samples of the crushed material will be collected and submitted to an analytical laboratory for sieve analysis (ASTM C136/C117/D422) and modified proctor test (ASTM D1657). The crushed material will be placed in 12-inch thick loose lifts and each lift will be compacted to 90 to 95% maximum dry density as determined by modified proctor.

### **5. Identification of the Material It Is Replacing**

In general, the proposed secondary material is intended to serve as gravel borrow. Given the existing topography of the areas anticipated for use of this material, it is likely that there will not be a significant "cut" volume generated from redevelopment in certain areas, and that future site grading efforts will require fill material. Using crushed fill instead of imported fill provides several advantages to the redevelopment efforts. Hundreds of truck cycles over public roads would be required if 22,500 cy of demolition debris were transported off-site and an equivalent volume of imported fill were in turn transported to the site. Use of the crushed building materials would avoid these impacts. In addition, the more crushed fill that is placed to raise the existing topographic elevations, the less the need to disturb native soils, as well as potentially to encounter subsurface obstructions that could impede future development activities and increase construction costs. Furthermore, the use of these fill materials as embankments, as described in the foregoing letter, is intended to provide additional structural support along Woodlawn Avenue, as well as to promote pedestrian and vehicle safety, by eliminating severe drop-offs along the retaining walls that support, and are directly adjacent to, both Woodlawn Avenue and Tyler Street. Lastly, this proposed effort of recycling demolition debris is consistent with MDEP's Waste Reduction Strategy, whereby a state-wide initiative has been employed to reduce the quantity of construction and demolition debris ("C&D debris") that is transported to landfill facilities for disposal.

### **6. Risk Management Techniques/BMPs**

To avoid potential public nuisances or disturbances during the proposed activity, GE will employ the same techniques used in past demolition activities conducted at the GE facility. These techniques include, but are not limited to, the following:



- Erosion and sedimentation control to limit the off-site migration of sediment via site drainage pathways;
- Dust suppression to eliminate the presence of visible dust;
- Use of noise muffling devices to keep construction noise to safe and tolerable limits;
- Perimeter ambient air monitoring for PCBs and particulate matter;
- Cleaning of reusable contractor equipment and materials prior to leaving the site;
- Limiting work hours to Monday through Friday during daylight hours; and
- Implementation of site security measures.

In addition, with regard to the final placement of the secondary material, GE anticipates that: (a) where the crushed fill is used to backfill subsurface voids within paved areas, the final surface will be patched with either concrete or asphalt to match the surrounding surface features; and (b) where the crushed fill is used for grading material, it will be placed in maximum 12-inch-thick loose lifts, compacted, covered with a minimum of 12 inches of soil, and hydroseeded to establish vegetative growth. Given that this crushed material will have average concentrations of PCBs and other constituents below MDEP's Method 1 soil standards for unrestricted, residential areas, this usage of the material should be fully protective of human health and the environment. Furthermore, the use of the proposed secondary material should not adversely impact groundwater at the GE facility, based on the constituent concentrations of the proposed secondary material relative to the applicable MCP Method 1 groundwater standards (i.e., the GW-2 and GW-3 standards). In any case, the groundwater at the PEDAs Properties and other areas of the GE facility has been, and continues to be, sampled and monitored by GE as part of the Groundwater Management Area 1 program conducted pursuant to the CD. Finally, the use of these materials will be subject to the applicable provisions of the EREs for the areas where the materials will be placed.

#### **7. Identification of the Proposed Location of Use or Types of Locations where the Secondary Material Will be Used**

At this time, GE and PEDAs anticipate that these materials will be used for the following applications, as described in the foregoing letter to which this document is attached:

1. Backfilling of vaults, pits, tunnels, and other subsurface voids within and adjacent to the 19s Complex;
2. Extending the Tyler Street embankment along the northern face of Buildings 7, 17, and 17C; and
3. Creating an embankment along the Woodlawn Avenue retaining wall.

While these are the current anticipated uses, GE's proposed approach includes, at PEDAs request, a provision that if PEDAs, based on its development plans, should decide that the crushed materials should be used initially at, or moved to, other locations at the PEDAs Properties for use as backfill or grading materials, the materials may be used at such other locations, subject to EPA approval of PEDAs specific plans and subject to any applicable provisions of the EREs for those areas. In addition, as also requested by PEDAs, if PEDAs should decide that it does not wish to use some or all of the materials or wishes those materials to be removed from the PEDAs Properties, GE will arrange for the disposition of such materials outside the PEDAs Properties – either at the Hill 78 OPCA (if still open) or at an authorized off-site disposal facility or, upon specific application to and approval by EPA, at another location within the GE Plant Area for an alternate on-site use. At this time, GE anticipates that such alternate use would consist of using the crushed building materials as fill to support landscaping efforts in the 60s Complex within East Street Area 2-South. While the 60s Complex is not subject to transfer to PEDAs, the demolition and restoration of the 60s Complex are part of the Definitive Economic Development Agreement between GE and PEDAs, and landscaping in this area would be beneficial to PEDAs redevelopment efforts. A more detailed discussion regarding the anticipated and alternate uses of these materials is provided in Section B of the foregoing letter.

### C. NO SIGNIFICANT RISK

The proposed on-site use of crushed building materials, under the conditions described above, will not create a significant risk to public health, safety, or the environment. To begin with, the areas where these materials will be placed are commercial areas subject to the CD, at which conversion to less restrictive uses (e.g., residential, recreational) will be precluded, and excavations will be restricted, by the EREs applicable to these areas. Nevertheless, the average concentrations of PCBs and other retained constituents in these materials are not only far below the applicable Performance Standards for commercial properties, but are also below the CD Performance Standards and MCP Method 1 Category S-1 soil standards for residential areas. Additionally, the maximum concentration of PCBs in these materials is not only below the applicable NTE level for commercial areas, but also below the applicable NTE level for residential areas in the CD. These residential standards have been determined by MDEP, both in the CD and in the MCP, to be protective of human health and the environment for residential and other unrestricted use at sites subject to remediation, including specifically the GE-Pittsfield/Housatonic River Site.

Moreover, the placement of these materials will be conducted in accordance with the BMPs described in Section B.6 above, so as to avoid potential nuisance conditions during this activity. Further, although the concentrations within these materials are such that they would not present a significant risk if present in surface soils, the materials will in fact be covered by asphalt or concrete or by a minimum one-foot vegetative cover.

It should also be noted that the proposed use of building materials will not cause an increase in the concentrations of PCBs in the areas where those materials will be placed. As previously stated, the average PCB concentration in those materials is 0.956 ppm. That average concentration is below the average PCB concentrations in the areas anticipated for placement of these materials – i.e., the 19s Complex and a small portion of East Street Area 2-North outside of and adjacent to the 19s Complex. As shown in GE's *Final RD/RA Work Plan Addendum for East Street Area 2-North* (submitted in May 2007), the average PCB concentrations in the 19s Complex (which will not require remediation) are 1.4 ppm in the 0-1 foot depth increment, 5.2 ppm in the 1-6 foot depth increment, and 8.9 ppm in the 0-15 foot depth increment, while the anticipated post-remediation average PCB concentrations in the overall East Street Area 2-North will be 9.5 ppm in the 0-1 foot depth increment, 59.5 ppm in the 1-6 foot depth increment, and 61.5 ppm in the 0-15 foot depth increment. (As indicated above, any use of the building materials at one of the alternate locations identified above would be subject to EPA approval of a specific plan. However, even in such a case, the average PCB concentration in the crushed building materials would be below the average concentration of the areas where those materials may be placed. For example, the existing average PCB concentrations in the top foot of soil at the 20s, 30s, and 40s Complexes are in the range of 5.7 to 9.5 ppm.)

Similarly, with respect to the non-PCB constituents that were retained after the initial screening, the concentrations in the building materials proposed for on-site use, which are below the Method 1 Category S-1 soil standards, would not be expected to cause any significant increase in the concentrations of those constituents in the receiving areas. For example, the average concentration of arsenic in the building materials (5.37 ppm) does not exceed the average arsenic concentrations in the 19s Complex and East Street Area 2-North (which are approximately 6 ppm in both areas). While the average concentrations of chromium and lead in the building materials (22.4 and 46.7 ppm, respectively) are slightly higher than the average concentrations in the 19s Complex and East Street Area 2-North (which are in the range of approximately 6-8 ppm for chromium and 23-35 ppm for lead), the proposed addition of a relatively small amount of building materials with those concentrations into the much larger receiving areas would not be expected to produce any significant increase in the overall average concentrations in those larger areas.

Finally, as discussed in Section B.6 above, given the concentrations in the proposed building materials, the use of those materials should not adversely affect groundwater in the areas where they are placed. In any event, groundwater monitoring will be conducted to identify any impacts to groundwater.

For these reasons, the proposed use of the crushed building materials from Buildings 7, 11, 16, 17, 17C, and 19 will not present any adverse impacts or significant risks to public health, safety, or the environment. Based on this and the other considerations discussed above, the proposed use of these materials meets the substantive requirements of 310 CMR 19.060.