



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

SDMS 37788

Transmitted via Federal Express

February 21, 2002

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

Re: GE-Pittsfield/Housatonic River Site
Plant Site 3 Groundwater Management Area (GECD340)
Addendum to Baseline Monitoring Program Proposal

Dear Mr. Olson:

In accordance with the Consent Decree for the GE-Pittsfield/Housatonic River Site and Attachment H to the Statement of Work for Removal Actions Outside the River, GE submitted a *Baseline Monitoring Program Proposal for Plant Site 3 Groundwater Management Area* (Baseline Monitoring Proposal) on July 23, 2001. This Groundwater Management Area is also known as GMA 4. EPA provided conditional approval of the Baseline Monitoring Proposal by letter dated December 28, 2001. EPA's conditional approval letter required several modifications to the scope of the baseline monitoring program for GMA 4 and directed GE to submit an Addendum to the Baseline Monitoring Proposal to address the conditions in EPA's letter and to set forth a revised schedule for the baseline monitoring program activities.

This letter constitutes the Addendum to GE's Baseline Monitoring Proposal. This Addendum describes the modifications to GE's baseline monitoring program for GMA 4. These modifications include the modifications required by EPA's conditional approval letter, as well as a couple of additional proposed modifications. In addition, this Addendum presents a schedule for the upcoming field activities (including the completion of well installations and the Spring 2002 groundwater monitoring) and associated reporting.

Overview of Program

The baseline groundwater monitoring program for GMA 4 includes a network of wells that will be sampled semi-annually for groundwater quality. These wells are of various types, as described in the Baseline Monitoring Proposal:

- GW-2 Sentinel Wells wells that will be sampled for compliance with the GW-2 standards.
- GW-3 Perimeter Wells wells around the perimeter of this GMA that will be sampled for the constituents subject to the GW-3 standards. (These include both upgradient and downgradient perimeter wells, but only the downgradient perimeter wells are considered compliance points for the GW-3 standards.)

- Source Area Sentinel Wells wells located near potential source areas, which will be sampled for the constituents subject to the GW-3 standards to provide an early indication of groundwater quality conditions that could exceed the GW-3 standards at downgradient perimeter wells.
- On-Plant Consolidation Area (OPCA) Groundwater Monitoring Program Monitoring Wells wells that are monitored to assess potential impacts to groundwater that may be attributable to GE's operation of the OPCAs. As discussed in the Baseline Monitoring Proposal, the ongoing OPCA groundwater monitoring program will be merged into the GMA 4 baseline monitoring program.

Some monitoring wells fall into more than one of these categories.

In addition, during the baseline monitoring program, GE will monitor numerous wells at GMA 4 for groundwater elevations and the potential presence of non-aqueous-phase liquid (NAPL). These wells will be monitored for such purposes at least quarterly, with some subject to more frequent monitoring (e.g., weekly).

Figure 1 illustrates the GMA 4 baseline groundwater monitoring program well locations.

Well Inventory/Inspection

On January 10-16, 2002, an inventory/inspection was performed of the existing monitoring wells at GMA 4 that were proposed for use in either the groundwater quality or water level/NAPL monitoring activities. The results of this inspection/inventory are presented in Table 1.

As a follow-up to this well inventory/inspection, GE is in the process removing the bottom sediment from all previously existing wells that will be sampled during the GMA 4 baseline monitoring program. This activity may lead to additional proposals to replace certain wells where significant accumulation of sediment has occurred which cannot be removed. In addition, as required by EPA's conditional approval letter, GE will shortly complete the checking and verification of survey coordinates and elevations of all existing wells that will be used in either the groundwater quality or water level/NAPL monitoring programs. This activity will include re-surveying selected monitoring wells where recent survey data are not available or where discrepancies in well locations or construction details were noted during the well inventory.

Modifications to Baseline Monitoring Program

In accordance with EPA's conditional approval letter and subsequent discussions between GE and EPA, the following modifications have been made to the baseline monitoring program:

- Well GMA4-2 was installed as a GW-2 sentinel well between Buildings OP-1 and OP-2.
- A new GW-2 sentinel well/GW-3 perimeter well (GMA4-3) will be installed along Plastics Avenue near Building OP-1. This well will replace well RF-14 for groundwater quality monitoring purposes. However, well RF-14 will continue to be monitored for groundwater elevation on a quarterly basis.
- Well UB-MW-5 will be added as a GW-2 sentinel well, and will also be monitored as an upgradient GW-3 perimeter well instead of well 78-2. Well 78-2 will be monitored for groundwater elevation and NAPL presence only.

• Well H78B-13 will be monitored as a GW-3 perimeter well instead of well NY-2, as previously proposed. Although GE had previously thought that well H78B-13 was destroyed during the recent expansion of Merrill Road, it was located during the January 2002 well inventory. However, the well was found to contain significant sedimentation, which GE will attempt to remove. If the sediment removal attempt fails, GE will replace the well.

In addition to making these modifications, GE has reviewed all of the existing monitoring wells that will be sampled as GW-2 sentinel wells (with the exception of certain previously approved OPCA groundwater monitoring program wells) to ensure that they are screened to intersect the water table. All such wells do so except for well 60B. Well 60B is screened from 20 to 25 feet below grade, which is below the maximum applicable GW-2 depth of 15 feet. Accordingly, GE proposes to eliminate well 60B as a GW-2 sentinel well. GE does not propose to install a replacement well at this location, since new GW-2 well GMA4-3 will be installed nearby. GE will retain well 60B as a GW-3 perimeter well.

Further, GE proposes to replace well H78B-17 with well H78B-17R as a GW-3 perimeter well in the baseline groundwater sampling program. Well H78B-17R is a 4-inch-diameter well and thus should produce more water for sampling than well H78B-17, which is a 1-inch-diameter well. Well H78B-17 will be retained for water level measurements, as a paired well with well H78B-17R to assess vertical gradients.

Taking account of these modifications and proposed modifications, GE's proposed modified GMA 4 baseline groundwater quality monitoring program is summarized in Table 2. That table lists all existing and new wells to be sampled for groundwater quality in the GMA 4 baseline program, and it specifies the type of well each one will be, as well as the rationale. As shown in Table 2, the modified baseline groundwater quality monitoring program will involve 23 monitoring wells (as compared to 22 in the July 2001 Baseline Monitoring Proposal). Of these, nine wells will be monitored as GW-2 sentinel wells, ten as GW-3 perimeter wells, nine as GW-3 source area sentinel wells, and 12 as OPCA monitoring wells (note that some wells will be monitored under more than one category).

The GW-2 and GW-3 monitoring wells will be sampled on a semi-annual basis during the baseline period. The groundwater samples from the wells to be monitored solely as GW-2 sentinel wells will be analyzed initially for Appendix IX volatile organic compounds (VOCs) plus 2-chloroethylvinyl ether, as well as five compounds listed as semi-volatile organic compounds (SVOCs) (1,2-dichlorobenzene, 1,3-dichlorobenzene, 1,4-dichlorobenzene, 1,2,4-trichlorobenzene, and naphthalene). The samples from the GW-3 perimeter and source area sentinel wells will be analyzed initially for all Appendix IX constituents plus 2-chloroethylvinyl ether, benzidine, and 1,2-diphenylhydrazine (Appendix IX+3). As the baseline monitoring program proceeds, GE may propose to reduce the analyte list at certain of these well locations if appropriate. In addition, as discussed below, two additional wells that are not part of the routine groundwater sampling program will be sampled and analyzed for VOCs during the initial baseline sampling event.

Groundwater Elevation/NAPL Monitoring

All the wells included in the groundwater sampling program (listed in Table 2) will also be monitored for groundwater elevation and the potential presence of NAPL on a quarterly basis. In addition, a number of other wells at GMA 4 will be routinely monitored for groundwater elevation and the potential presence of NAPL. Those additional wells (which will be monitored routinely for water levels and potential NAPL presence but not sampled for groundwater quality) are listed in Table 3, along with the frequency of

monitoring for each. In accordance with EPA's conditional approval letter, these wells include H78B-18, H78B-28, and H78B-28R, which will be temporarily monitored until they are decommissioned as part of the OPCA operations. GE will coordinate the quarterly groundwater elevation monitoring for GMA 4 with that of adjacent portions of GMA 1 (located to the west of GMA 4) and GMA 3 (located to the east of GMA 4), to the extent practicable, so as to allow the presentation of groundwater contour maps in future GMA 4 reports that correspond to those prepared for adjacent GMAs.

The only location within GMA 4 where LNAPL has been observed to date is in well H78B-8R, although no LNAPL has been observed in this well since May 2001. In the next semi-annual groundwater monitoring report for the OPCAs (due to be submitted by February 28, 2002), GE will provide a summary of LNAPL monitoring and recovery data compiled since LNAPL was first observed in this well in May 1999. GE will also continue to monitor this well on a weekly basis (or such other frequency as may subsequently be proposed by GE and approved by EPA), and will present the monitoring results in future GMA 4 baseline interim reports.

Also, EPA has recently provided GE with draft recommended modifications to the locations of till borings RAA9-1 and RAA9-2, based on the results of an earth resistivity geophysical survey conducted by Roy F. Weston, Inc. during the week of December 17, 2001. The tentatively identified locations of these borings are depicted on the attached Figure 1. If either of these borings indicates the potential presence of DNAPL below the water table, a monitoring well will be installed at that location with the well screen placed at the depth of concern. GE will monitor such well(s) for groundwater elevation and the potential presence of DNAPL as part of the quarterly groundwater elevation monitoring program for GMA 4.

Finally, GE has performed an electromagnetic survey around the boundary of the Hill 78 OPCA and will perform a supplemental geophysical survey in the near future. This activity is currently being conducted separately from the GMA 4 baseline monitoring program. However, if the results of the geophysical survey activities indicate that additional soil borings/monitoring wells should be installed, GE may propose to incorporate those activities into the GMA 4 baseline monitoring program.

Trichloroethene Assessment

EPA's conditional approval letter also required GE to address the presence of trichloroethene (TCE), which has been detected in several prior groundwater samples collected from monitoring wells located to the south of the Pittsfield Generating Facility. Three wells in this area (78-3, 78-5, and H78B-17R) are included in the GMA 4 baseline monitoring program. To further assess the extent of TCE in this area, GE will sample two additional wells during the spring 2002 groundwater quality monitoring event for VOCs. Specifically, GE will collect samples from wells 78-4 and H78B-16 and submit those samples for VOC analysis. GE will utilize the results of this expanded sampling effort to evaluate the need for, and if necessary, potential locations for additional downgradient monitoring wells to address the occurrence of TCE or related VOCs, if present. GE will present the results of this evaluation and a proposal for follow-up activities (if any) in the next groundwater quality interim report for GMA 4.

Schedule

To facilitate performance of the Spring 2002 baseline groundwater sampling event, GE has commenced well installation activities at locations where EPA has approved the new or replacement wells. To date, new wells GMA4-1 and GMA4-2 have been installed. GE plans to install well GMA4-3 after the ground

in front of Building OP-1 freezes sufficiently to support the drilling equipment without causing excessive damage to the landscaping. If weather conditions do not allow this in the next couple of weeks, GE will install this well utilizing an alternate approach (e.g., placement of planking beneath rig access route) to minimize damage to this area. In addition, GE plans within the next month to complete the sediment removal from the existing wells that will be sampled (and to replace any such wells where there is a significant accumulation of sediment that cannot be removed), and to complete the verification of survey coordinates and elevations of all wells included in the GMA 4 baseline program, as well as any necessary re-surveying. Finally, GE will install borings RAA9-1 and RAA9-2 upon final approval of their locations by EPA.

GE plans to conduct the initial baseline (Spring 2002) groundwater sampling event at GMA 3 in approximately April 2002, and to submit a Baseline Groundwater Quality Interim Report on this event by August 31, 2002, as provided in the conditionally approved Baseline Monitoring Proposal.

GE will coordinate with EPA's field representatives prior to performing the activities discussed in this Addendum.

Please call Andrew Silfer or me if you have any questions regarding this Addendum.

Sincerely,

John F. Novotny, P.E.

John F. Touchy Maken

Manager, Facilities and Brownfields Programs

Enclosures

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Public Information Repositories

GE Internal Repositories



GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

PLANT SITE 3 GROUNDWATER MANAGEMENT AREA

BASELINE GROUNDWATER MONITORING PROGRAM WELL INVENTORY RESULTS

WELL ID	WELL DIAMETER (Inches)	DATE OF INVENTORY	GROUND ELEVATION (Feet AMSL)	MEASURING POINT ELEVATION (Feet AMSL)	LISTED WELL STICKUP (Feet AGS)	MEASURED WELL STICKUP (Feet AGS)	LISTED TOTAL DEPTH (Feet BGS)	LISTED TOTAL DEPTH (Feet BMP)	MEASURED TOTAL DEPTH (Feet BMP)	OBSERVATIONS
60A	2	01/11/02		***	***	-0.95	50.00	49.05	43.94	
60B	2	01/11/02				-0,45	25,00	24.55	9,39	
78-1	4	01/10/02	1,027.40	1,026.34	-1.06	-0.28	23.00	21.94	23.11	Well in usable condition, but no cement present around the outside of this well.
78-2	4	01/10/02	1,034.90	1,033,96	-0.94	-0.48	21.00	20.06	20.69	Well in usable condition, but cement around well is broken, cracked, and partially missing.
78-3	4	01/10/02	1,008.10	1,007.20	-0.90	-0.23	25.00	24.10	24.77	oroxen, cracked, and partiany missing.
78-4	4	01/16/02	999.50	998.63	-0.87	-0.31	21.00	20.13	21.50	
78-5	4	01/11/02	997.80	996.96	-0.84	-0.18	17.00	16.16	16,20	
78-6	4	01/11/02	1,013.10	1,011.99	-1.11	-0.27	18,00	16.89	10.14	Well in usable condition, but cement pad is broken/missing, and bolts to the cover were missing could not be replaced as the threads were stripped.
H78B-8	1	01/10/02	1,022.70	1,025.89	3.19	3.01	20.50	23.69	22.53	
H78B-8R	4	01/10/02	1,023.20	1,025.09	1.89	1.82	28.30	30.19	31.12	
H78B-13	1	01/10/02	989.80	992.71	2.91	0.97	18.00	20.91	10.07	Well in usable condition, but cement around base of well is broken, cracked, and some missing.
H78B-15	1	01/10/02	1,009.80	1,012.73	2.93	2.72	16.00	18.93	18.24	
H78B-16	1	01/11/02	996.00	999.21	3.21	3,25	14.00	17.21	17.04	Well in usable condition, but cement around the base of above-grade standpipe is broken, cracked, and some
H78B-17	l l	01/10/02	999.30	1,002.96	3.66	3.10	16.00	19.66	19.02	
H78B-17R	4	01/10/02	999.20	1,000.48	1.28	2.16	23.30	24.58	24.71	
H78B-18	1	01/16/02	1,015.60	1,019.31	3.71	3.59	19.00	22.71	22.42	
H78B-28	1	01/16/02	1,018.40	1,021.57	3.17	3,03	12.00	15.17	15.08	
H78B-28R	4	01/16/02	1,018.30	1,019.57	1.27	1.10	18.30	19.57	20.24	
NY-2	2	01/16/02	993.10	993.01	-0.09	-0.14	24.50	24.41	19.85	
NY-4	2	01/10/02	1,024.80	1,024.53	-0.27	-0.14	32.00	31.73	31.51	
OPCA-MW-1	2	01/10/02	1,017.10	1,019.65	2.55	2.50	30.10	32.65	32.60	
OPCA-MW-2	2	01/11/02	1,017.30	1,019.58	2.28	2.26	23.00	25.28	25.30	
OPCA-MW-3	2	01/11/02	1,015.30	1,014.87	-0.43	-0.45	28.00	27.57	26.91	

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

PLANT SITE 3 GROUNDWATER MANAGEMENT AREA

BASELINE GROUNDWATER MONITORING PROGRAM WELL INVENTORY RESULTS

WELL ID	WELL DIAMETER (Inches)	DATE OF INVENTORY	GROUND ELEVATION (Feet AMSL)	MEASURING POINT ELEVATION (Feet AMSL)	LISTED WELL STICKUP (Feet AGS)	MEASURED WELL STICKUP (Feet AGS)	LISTED TOTAL DEPTH (Feet BGS)	LISTED TOTAL DEPTH (Feet BMP)	MEASURED TOTAL DEPTH (Feet BMP)	OBSERVATIONS
OPCA-MW-5R	2	01/11/02	1,016.58	1,016.28	-0.30	-0.32	21.25	20.95	21.62	
OPCA-MW-6	2	01/11/02	1,022.70	1,022.10	-0.60	-0.60	25.00	24.40	19.89	
OPCA-MW-8	2	01/10/02	1,027.90	1,027.57	-0.33	-0.49	23.50	23.17	23.25	
RF-14	4	01/11/02	991.67	991.67	0.00	-0.33	22.00	22.00	22.76	
RF-15	11	01/11/02	1,011.29	1,011.29	0.00	-0.38	24.00	24.00	19.92	
UB-MW-5	2	01/11/02	1,006.30	1,006.10	-0.20	-0.24	17.00	16.80	15.77	
UB-MW-6	2	01/11/02	1,020.30	1,019.70	-0.60	-0.79	36.00	35.40	35.22	

FEET AMSL: Feet above mean sea level FEET AGS: Feet above ground surface FEET BGS: Feet below ground surface FEET BMP: Feet below measuring point

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

PLANT SITE 3 GROUNDWATER MANAGEMENT AREA

REVISED BASELINE GROUNDWATER QUALITY SAMPLING PROGRAM

WELL ID	MONITORING WELL TYPE	APPLICABLE GROUNDWATER PERFORMANCE STANDARD	SCREEN INTERVAL (Ft. BGS)	APPROX. AVG. DEPTH TO WATER (Ft. BGS)	RATIONALE
78-1	Perimeter/OPCA	GW-3	8-23	11.02	Upgradient perimeter; part of OPCA monitoring program
78-3	Perimeter	GW-3	10-25	16.67	Downgradient perimeter
78-5	Perimeter	GW-3	2-17	5.26	Downgradient perimeter
78-6	Perimeter/OPCA	GW-3	3-18	8.94	Upgradient perimeter; part of OPCA monitoring program
H78B-13	Perimeter	GW-3	6-18	4.54	Spatial representation in southwest corner or GMA (replaces well NY-2)
H78B-15	GW-2 Sentinel/ Source Area Sentinel/OPCA	GW-2/GW-3	6-16	10.41	Near Pittsfield Generating Company Warehouse Storage Buildings; part of OPCA monitoring program
H78B-17R	Perimeter	GW-3	14.3-23.6	12.91	Downgradient perimeter (replaces well H78B-17).
NY-4	Perimeter/OPCA	GW-3	17-32	9.94	Upgradient perimeter; part of OPCA monitoring program
RF-15	GW-2 Sentinel/Perimeter	GW-2/GW-3	9-24	15.46	Downgradient perimeter near Buildings OP-1, OP-1B Garage, and OP-2B Boiler House
60B	Perimeter	GW-3	20-25	15.01	Downgradient perimeter near Bldg. OP-1
UB-MW-5	GW-2 Sentinel/Perimeter	GW-2/GW-3	7-17	14.08	GW-2 sentinel well and perimeter well near Building OP-2 (replaces well 78-2)
GMA4-1	GW-2 Sentinel	GW-2	13.3-28.3	24.90	Near Pittsfield Generating Company Steam Turbine Generator Building
GMA4-2	GW-2 Sentinel	GW-2	9.59-19.59	14.03	GW-2 sentinel well between Buildings OP-1 and OP-2
GMA4-3	GW-2 Sentinel	GW-2	WATER TABLE	N/A	East edge of GMA 4 near Building OP-1 (replaces well RF-14)
OPCA-MW-1	GW-2 Sentinel/ Source Area Sentinel/OPCA	GW-2/GW-3	20.1-30.1	7.38	Near Bldg. 78; part of OPCA monitoring program
OPCA-MW-2	Source Area Sentinel/OPCA	GW-3	13-23	16.20	Part of OPCA monitoring program
OPCA-MW-3	Source Area Sentinel/OPCA	GW-3	18-28	21.16	Part of OPCA monitoring program

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

PLANT SITE 3 GROUNDWATER MANAGEMENT AREA

REVISED BASELINE GROUNDWATER QUALITY SAMPLING PROGRAM

WELL ID	MONITORING WELL TYPE	APPLICABLE GROUNDWATER PERFORMANCE STANDARD	SCREEN INTERVAL (Ft. BGS)	APPROX. AVG. DEPTH TO WATER (Ft. BGS)	RATIONALE
OPCA-MW-4	GW-2 Sentinel/	GW-2/GW-3	12-22	12.93	Near Pittsfield Generating Company Gas Turbine Generator Bldg.; part of OPCA monitoring
	Source Area Sentinel/OPCA				program
OPCA-MW-5R	GW-2 Sentinel/	GW-2/GW-3	11.25-21.25	13.64	Near Pittsfield Generating Company Gas Turbine Generator Bldg.; part of OPCA monitoring
	Source Area Sentinel/OPCA				program
OPCA-MW-6	Source Area Sentinel/OPCA	GW-3	15-25	18.27	Part of OPCA monitoring program
OPCA-MW-7	Source Area Sentinel/OPCA	GW-3	14-24	16.79	Part of OPCA monitoring program
OPCA-MW-8	Source Area Sentinel/OPCA	GW-3	13.5-23.5	14.04	Part of OPCA monitoring program
ASW-5	Water Supply (See Note 2)	Not Applicable	Not Applicable	Not Applicable	Pittsfield Generating Co. water supply well monitoring program

Notes:

- 1. Well IDs listed in italics are new wells.
- 2. Pittsfield Generating Company water supply well ASW-5 will be monitored in accordance with its existing permit.
- 3. Each of the wells listed above will also be monitored for depth to water and for the presence of NAPL on a quarterly basis.

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

PLANT SITE 3 GROUNDWATER MANAGEMENT AREA

ADDITIONAL WELLS TO BE MONITORED ONLY FOR GROUNDWATER ELEVATION AND POTENTIAL PRESENCE OF NAPL

WELL ID	SCREEN INTERVAL (Ft. BGS)	APPROX. AVG. DEPTH TO WATER (Ft. BGS)	FREQUENCY OF MONITORING	RATIONALE/COMMENT
78-2	6-21	9.09	Quarterly	Upgradient perimeter at topographic high area
H78B-8	10.5-20.5	18.09	Quarterly	Vertical gradient assessment (paired with well H78B-8R)
H78B-8R	19.6-28.9	26.51	Weekly	Weekly NAPL monitoring and removal
H78B-16	4-14	9.11	Quarterly	NAPL monitoring within till trough.
H78B-17	6-16	12.89	Quarterly	Vertical gradient assessment (paired with well H78B-17R).
H78B-18	6-19	6.25	Quarterly	Well to be temporarily monitored until decommissioned as part of OPCA operations
H78B-28	3.5-12	7.70	Quarterly	Well to be temporarily monitored until decommissioned as part of OPCA operations
H78B-28R	9.3-18.6	8.30	Quarterly	Well to be temporarily monitored until decommissioned as part of OPCA operations
RF-14	7-22	10.56	Quarterly	Northeast corner of GMA 4 near Building OP-1
60A	45-50	15.00	Quarterly	Vertical gradient assessment (paired with well 60B)
UB-MW-6	26-36	24.40	Quarterly	Spatial representation near change in topography
RAA9-1 Till Boring (See Note 1)	Not Applicable	Not Applicable	Not Applicable	Soil boring to till interface in trough near Pittsfield Generating Company
RAA9-2 Till Boring (See Note 1)	Not Applicable	Not Applicable	Not Applicable	Soil boring to till interface in trough near Pittsfield Generating Company

Note:

1. Till Investigation borings will be converted to monitoring wells for groundwater elevation/NAPL monitoring if indications of DNAPL are observed.

