**TECHNICAL REPORT**

# *Removal Design/Removal Action Work Plan for Allendale School Property*

General Electric Company
Pittsfield, Massachusetts

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# 1. Introduction

## 1.1 General

This *Removal Design/Removal Action Work Plan for the Allendale School Property* (Work Plan) summarizes the response actions proposed by the General Electric Company (GE) for the Allendale School Property (the Property) located in Pittsfield, Massachusetts (Figure 1). The response actions at the Property are collectively referred to as the Allendale School Removal Action and will be conducted pursuant to the approval of this Work Plan by the United States Environmental Protection Agency (USEPA) after reasonable opportunity for review and comment by the Massachusetts Department of Environmental Protection (MDEP). This Removal Action is one of several response actions at the overall Pittsfield/Housatonic River Site as to which GE and several government agencies (the Agencies), including USEPA and MDEP, reached a settlement agreement in principle in September 1998.

The contents of this Work Plan have been developed based on the settlement agreement in principal and subsequent discussions between GE, USEPA, and MDEP. These requirements, in combination with environmental data collected over the last several years (including some collected as recently as May 1999), provide the information from which the response actions for the Property were developed and designed by GE. The Removal Design/Removal Action (RD/RA) activities described in this Work Plan are primarily related to the presence of PCBs in the Property soils. However, several other topics are addressed herein, including the following:

- Background information, including a site description and summary of prior investigation and remedial activities;
- Identification of Performance Standards and Applicable or Relevant and Appropriate Requirements (ARARs) for the Removal Action;
- Development of proposed soil removal limits and subsequent consolidation/disposition of the excavated materials;
- Evaluation of non-PCB constituents in soil;
- Initiation and performance of the Removal Action;
- Property restoration details; and

C Anticipated project schedule.

Given the time available for performance of the Removal Action, USEPA review and approval of this Work Plan (and GE's subsequent initiation of on-site activities) must be performed in as expedited a manner as possible. Accordingly, this Work Plan focuses on the technical aspects of the proposed response actions for which USEPA review/approval is required. Several other response action components (primarily related to the implementation of the response actions) are presented herein, although such information is presented in general terms. (GE will continue to develop the non-time-critical aspects of the proposed response actions, and will keep the Agencies apprised of their development.) Several of the implementation components of the response actions (as presented in this Work Plan) are also subject to future modification either prior to and/or during execution of the response actions. Modifications may occur as a result of field conditions (actual versus anticipated), project sequencing and logistics, availability of key equipment and materials, and other related changes that allow GE to improve upon the overall project performance, efficiencies, and schedule. GE's ability to identify and implement such modifications have been demonstrated on numerous occasions for remediation projects of similar scope and complexity over the past few years, and GE will draw from that experience to ensure that the response actions performed at the Property are equally successful.

## 1.2 Overview of Proposed Response Actions

The proposed response actions for the Property generally involve the removal of soils from the Property that exceed 2 ppm PCBs, replacement of those soils with clean soils from an off-site location (or with existing on-site soils containing less than 2 ppm PCBs), and restoration of the affected areas. As presented in this Work Plan, it is anticipated that approximately 29,000 cubic yards of soil will be removed from the Property based on the response actions identified above.

Although the proposed response actions are primarily related to the presence of PCBs in soils, several other non-PCB constituents 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) -- have been detected in the Property soils. However, as summarized in this Work Plan, the response actions proposed for PCBs will be sufficient to address any risk-related concerns associated with the presence of non-PCB constituents in soil, so that no additional response actions are necessary.

Since the time that the settlement agreement was reached, GE and the Agencies have continued to discuss and negotiate the terms of a Consent Decree (and accompanying Statement of Work) to embody the contents of the agreement. At the present time, several remaining issues must be resolved before a final agreement can be reached between the parties. Subsequently, the final agreement (i.e., the Consent Decree) will be lodged in federal court, and subject to public comment and court review before it is entered by the court and considered legally binding on the parties involved. However, with respect to the Property, and certain other areas within the Pittsfield/Housatonic River Site, GE has agreed with the Agencies that it will perform certain response actions after lodging but prior to entry of the Consent Decree. As a result, GE has expedited the preparation of this Work Plan (and several ancillary activities directly and indirectly related to this Removal Action) to facilitate the initiation, performance, and completion of the required activities within the available timeframe.

Included in this Work Plan is an anticipated schedule related to the proposed Removal Action. Concurrent with USEPA review of this Work Plan, GE will solicit proposals from qualified contractors to conduct the work outlined in this Work Plan and will award the project using a cost- and qualifications-based procurement process. Following that process, mobilization and initiation of project activities will proceed once USEPA approval of this Work Plan is received, and on-site soil removal activities will begin upon lodging of the Consent Decree in federal court. Barring unforeseen delays, it is currently anticipated that on-site activities at the Property can be initiated in early July, with substantial project completion attained by early September.

## 1.3 Coordination With Other Response Actions

In addition to the performance of response actions for the Property, GE anticipates that response actions related to the first ½-mile reach of the Housatonic River (involving the removal of bank soils and river sediments from the portion of the river located between Newell Street and Lyman Street in Pittsfield) will begin in 1999. Collectively, these activities will result in the removal of materials (e.g., soils, sediments, etc.) that will require disposition once excavated. Under the terms of the settlement agreement reached between GE and the Agencies, such materials may be permanently placed (subject to several conditions) into one or more consolidation areas located within GE's Pittsfield facility. Therefore, concurrent with the performance of RD/RA activities described in this Work Plan, GE identified and evaluated several potential on-plant consolidation areas, and in March 1999 submitted a document entitled *Conceptual Work Plan for Future On-Plant Consolidation Areas* (Conceptual Work Plan) (Blasland, Bouck & Lee, Inc.). In that report, three potential areas were identified for potential future use as on-plant consolidation areas, and two of these -- the Hill 78 Consolidation Area and the Building 71

Consolidation Area (Figure 2) -- were proposed for development and use corresponding to the start of response actions related to the Property and first ½ -mile reach of the Housatonic River. GE will shortly submit a Detailed Work Plan for the on-plant consolidation areas, which will provide additional technical design and construction details regarding the Hill 78 and Building 71 Consolidation Areas, with an emphasis on the near-term construction activities necessary to support the response actions scheduled to begin in 1999.

For the purposes of this Work Plan, information regarding the anticipated use and operations of the on-plant consolidation areas will be summarized herein; however, more specific details regarding the operations associated with these consolidation areas will be addressed in the report pertaining to those areas.

### 1.4 Format of Work Plan

The remainder of this Work Plan is presented in four sections. The title and a brief overview of each section follows:

**Section 2 - Site Description and Background,** presents an overview of the current site features and summarizes prior investigations and remedial actions.

**Section 3 - Summary of Removal Action Design Activities,** summarizes the information that was considered in the development and design of the proposed response actions. Included in this section is a summary of the Performance Standards and ARARs; a description of the approach used to identify the overall soil removal limits; information concerning the staging and re-use of certain of the excavated soils; and the soils subject to consolidation at either the Hill 78 or Building 71 Consolidation Areas. Also presented in this section is a summary of the evaluations conducted by GE concerning the need for response actions to address non-PCB constituents present in soils.

**Section 4 - Removal Action Implementation Plan,** describes the various elements of implementation related to the response action design presented in Section 3, including project organization; site preparation activities; soil excavation, handling, and disposal; and site restoration.

**Section 5 - Project Schedule,** identifies the anticipated schedule for implementation of the Removal Action at the Property.

Throughout this Work Plan, numerous tables and figures are referenced to supplement the report text and provide more detailed information concerning various aspects of the proposed Removal Action. In addition, GE has prepared numerous other documents and reports related to the Property dating back to the early 1990s. These reports provide an even greater level of detail should such information be desired (as appropriate, references to the prior documents will be provided within this Work Plan). Finally, concurrent with this Work Plan, GE is preparing additional technical information that will be used by the selected contractor(s) to ensure that their actions are consistent with the contents of this Work Plan and achieve the required Performance Standards.

# 2. Site Description and Background

## 2.1 General

This section provides a summary of the Property's site features and surrounding areas and land uses, and briefly describes the environmental investigations and remedial actions that have been performed (primarily by GE) dating back to 1991. The majority of the information presented in this section has been previously documented in the following reports:

- *MCP Interim Phase II Report for the Allendale School Property* (Blasland & Bouck Engineers, P.C., January 1993);
- *MCP Supplemental Phase II Report for the Allendale School Property* (Blasland, Bouck & Lee, Inc., August 1997);
- *Addendum to the MCP Supplemental Phase II Report for the Allendale School Property* (Blasland, Bouck & Lee, Inc., June 1998);
- *Summary of April 1998 Soil Removal Activities at Allendale School* (Blasland, Bouck & Lee, Inc., July 1998); and
- *Pre-Design Work Plan for the Allendale School Property* (Blasland, Bouck & Lee, Inc., March 1999).

The above documents provide discussions on past and current site uses; site utilities; soil, groundwater, and ambient air investigations; and details of the 5-acre soil cover installed by GE in 1991. Section 2.2 provides an overview of site features; Section 2.3 summarizes prior site investigations and analytical data; while Section 2.4 summarizes the prior remedial actions performed by GE.

## 2.2 Overview of Site Features

The Property is located adjacent to and north of the GE facility in Pittsfield, Massachusetts across the Tyler Street Extension, and is bordered on the other three sides by residential areas (Figures 1 and 2). The portion of the GE Plant Area bordering the Property to the south is designated as the Hill 78 Area. That area is entirely fenced and,

with the exception of an area which is leased by the US Generating Company, comprises approximately 80 acres of the GE facility. This area includes the Hill 78 Consolidation Area and the Building 71 Consolidation Area.

The school building located within the Property occupies approximately 40,000 square feet (including recent additions) on a parcel that is approximately 12 acres in size. Prior to the construction of the school in approximately 1950, the Property was a relatively low-lying wetland area which was subsequently filled to facilitate development and construction of the school. Specifically, at the time of the school's construction, GE and the City of Pittsfield entered into an agreement under which the City removed soil material from GE property for use as fill material at the Property. The current topography of the Property is generally sloped in a southerly direction toward Tyler Street Extension, slightly toward the southeast corner of the Property. Surface elevations south of the school building ranges from approximately 1,010 feet (above mean sea level) to 1,005 feet, with banks located to the north and south of the rear portion of the Property. Figure 3 illustrates the current site topography, including the existing two-foot thick (approximate) soil cover which was installed by GE in 1991 (refer to Section 2.4).

Other notable site features include the numerous above- and below-ground utilities which traverse the Property. Figure 3 depicts the types and general locations of these utilities, based on mapping prepared in connection with the recent school expansion activities.

## 2.3 Summary of Prior Site Investigations

Initial investigations associated with the Property were conducted in 1990, and were prompted by information obtained during construction of the US Generating Company facility (formerly known as the Altresco Corporation Cogeneration Facility), located on GE property southeast of the Property (i.e., within the Hill 78 Area). Specifically, soil sampling within this GE property identified the presence of PCBs and led the MDEP to perform a limited soil and surface water sampling program within the Property in January 1990. This program detected low levels of PCBs in the surficial soils in the southeast corner of the Property. In response, the MDEP instructed GE to perform further investigations to assess the presence of PCBs in soils.

Prompted by the initial detection of PCBs by the MDEP, GE performed several subsequent investigations to characterize the presence and extent of PCBs, assess the potential presence of other hazardous constituents at the Property, and support the design and implementation of certain remedial actions. These investigations resulted in the collection and analysis of more than 1,300 soil samples from over 400 locations, and 16 groundwater samples

from 10 locations. These soil data are summarized in Tables 1 through 6, while the soil sampling locations are illustrated on Figures 4 and 5. (Based on the results of the groundwater investigations and consistent with the settlement agreement, response actions for groundwater are not required at the Property.)

Included in the above-referenced tables and figures are the results of the pre-design investigations performed by GE in April and May 1999. Such investigations were conducted to supplement the existing data set concerning the presence of PCBs and other constituents in soil, and to address certain data needs relative to the overall vertical and horizontal presence of PCBs at levels exceeding 2 ppm. These activities were conducted in accordance with a document entitled *Pre-Design Work Plan for the Allendale School Property* (Blasland, Bouck & Lee, Inc., March 1999), which was conditionally approved by the Agencies in letters dated April 14, 1999 and May 7, 1999. (GE submitted the results of these pre-design investigations in letters to the Agencies dated May 3, 1999 and May 24, 1999.)

A summary of the presence/extent of PCBs and other hazardous constituents in soils is provided below in Sections 2.3.1 and 2.3.2, respectively. Note that for those locations within the area currently occupied by the approximate two-foot thick soil cover, the referenced depth intervals are relative to the pre-cover grade, rather than the existing soil cover surface. This reporting convention facilitates a comparison with data independent of when or where it was collected (relative to the presence of the current surface cover).

### 2.3.1 PCBs in Soil

To date, over 1,300 soil samples (excluding QA/QC samples) have been collected and analyzed for PCBs at the Property. Of these, 30 samples were collected from the soil cover materials, and soils associated with 60 other samples have been removed as a result of various soil excavation activities (see discussion in Section 2.4). Of the remaining samples, more than 84 percent contain PCB concentrations less than 2 ppm. The maximum PCB concentration measured in the soils present beneath the existing soil cover is 1,100 ppm (location B-18, 1.5 to 2 feet below the existing soil cover), while the highest PCB concentration detected in samples located outside of the soil cover is 160 ppm (estimated) at a depth of 3 to 5 feet below grade (location ASB-12). A summary of the PCB soil data is provided on Figures 6 through 11 and summarized in Table 1.

### 2.3.2 Non-PCB Constituents in Soil

Prior site investigations within the Property included the collection and analysis of 49 soil samples collected from 35 locations. These samples were collected at various depths (including both surface and subsurface soil) and analyzed for Appendix IX+3 constituents. The results of these analyses are summarized in Tables 2 through 6, while Figure 5 illustrates the sampling locations within the Property. Detected constituents include various volatile organic compounds (Table 2), semi-volatile organic compounds (Table 3), pesticides/herbicides (Table 4), polychlorinated dibenzo-p-dioxins (dioxins) and polychlorinated dibenzofurans (furans) (Table 5), and inorganic constituents (Table 6). These non-PCB soil data have been further evaluated as part of the RD/RA activities described in this Work Plan; Section 3 provides a summary of those evaluations.

## 2.4 Summary of Prior Remedial Actions/Facility Improvements

Several prior remedial actions and facility improvements have been performed at the Property over the past several years, certain of which involved the handling and/or management of PCB-containing soils. These included the placement of a 5-acre soil cover, drainage improvements, the removal of approximately 700 tons of soil in conjunction with a school expansion, and the performance of remedial actions involving the removal of nearly 2,000 tons of additional soil. These activities are detailed in the prior documents previously listed in Section 2.1. A brief summary is provided below:

- In 1991, GE constructed a soil cover over an approximate 5-acre portion of the playground area of the Property (generally over those areas where soil PCB concentrations exceeded 2 ppm within the top 3 feet of existing soil) (see Figure 3). The soil cover was generally comprised of a geotextile layer, overlain with a minimum of 2 feet of "clean" soil composed of approximately 1.5 feet of compacted till and approximately 6 inches of topsoil. This soil cover was constructed with MDEP approval as a Short-Term Measure under the MCP;

- As part of the construction of the 1991 soil cover, GE also added surface water drainage enhancements to facilitate drainage at the Property, including a network of 6-inch perforated drainage laterals incorporated into the soil cover (see Figure 3);

- In 1997, GE assisted the City of Pittsfield in the removal and off-site disposal of approximately 400 tons of soil immediately adjacent to the school building (see Figure 4). The presence of PCBs in these soils was identified during pre-construction testing in the area(s) designated for the building expansion;

- In 1997, GE also assisted the City of Pittsfield in the removal and off-site disposal of approximately 300 tons of soil immediately adjacent to the school building (see Figure 4). This removal was performed in conjunction with the initial stages of construction for a new 3,000-gallon grease trap and a sanitary drainage pipeline located on the west side of the school; and

- In April 1998, GE removed approximately 2,000 tons of soil from several relatively small areas immediately adjacent to and outside of the existing soil cap along its north and east sides (see Figure 4). This soil removal was conducted as a supplement to the STM performed by GE in 1991 (involving the installation of the 2-foot thick soil cover), and included the removal and off-site disposal of soils within the Property that (a) were not beneath the existing soil cover, (b) were located in the uppermost three feet of the Property, and (c) contained PCBs above 2 ppm.

# 3. Summary of Removal Action Design Activities

## 3.1 General

This section of the Work Plan summarizes the Performance Standards and related information concerning the proposed response actions, with an emphasis on the horizontal and vertical limits of soil removal from the property, and the related design assumptions and supporting rationale. Subsequently, Section 4 of this Work Plan provides general information concerning the anticipated implementation of the proposed soil removal, and a description of ancillary activities necessary to facilitate and support such activities.

## 3.2 Performance Standards

The Performance Standards for the Allendale School Removal Action are as follows:

1. Except as noted in Performance Standard No. 2 below, GE shall remove all soils at the Property where PCBs have been detected at concentrations exceeding 2 ppm.

2. Within an approximate 25-foot wide strip along the rear portions of the current school building, GE shall remove soils as necessary to achieve a spatial average PCB concentration of less than 2 ppm. (This standard has been established to alleviate concerns regarding structural support of the school building during soil removal actions, as well as potential disruptions to the utility service lines present in a particular portion of this area.)

3. Following soil removal, GE shall replace the excavated areas with appropriate backfill. Such backfill may include the soil cover materials from the 1991 soil cover and other existing, on-site soils containing less than 2 ppm PCBs. GE shall restore the affected areas to generally match the topography, surface cover types, and facilities (e.g., ballfields and playground equipment) currently present within the affected areas.

4. Regarding the presence of Appendix IX+3 constituents other than PCBs in the Property soils, GE shall ensure that the following conditions will be achieved following the performance of response actions to address PCBs: (a) for polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans (dioxins/furans), no individual sample result with a Toxic Equivalent (TEQ) concentration in excess of USEPA's Preliminary Remediation Goal (PRG) of 1 ppb for dioxin TEQs in residential areas; and (b) for other individual constituents, any combination of the following: (i) maximum constituent concentrations in any individual sample that do not

exceed the USEPA Region 9 PRGs (or other screening PRGs based on the Region 9 PRGs, as approved by USEPA), or (ii) constituent concentrations that are consistent with background (based on summary statistics), or (iii) average constituent concentrations that do not exceed the applicable MCP Method 1 S-1 soil standards.

## 3.3 Applicable or Relevant and Appropriate Requirements (ARARs)

This section describes, for the Allendale School Removal Action, the Applicable or Relevant and Appropriate Requirements (ARARs) under federal and state environmental laws. Under the National Contingency Plan (NCP) adopted pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), removal actions must attain ARARs only to the extent practicable considering the exigencies of the situation (40 CFR 300.415(j)). A requirement under federal and state environmental laws may be either "applicable" or "relevant and appropriate" to a removal action. "Applicable requirements" are those cleanup standards, standards of control and other substantive requirements, criteria, or limitations that are promulgated under federal or state environmental laws and that specifically address a hazardous substance, pollutant, contaminant, response action, location, or other circumstance found at the site (40 CFR 300.5). "Relevant and appropriate requirements" are those promulgated cleanup standards, standards of control, and other substantive requirements, criteria, or limitations that, while not applicable to a hazardous substance, pollutant, contaminant, response action, or other circumstance at the site, address problems or situations sufficiently similar to those encountered at the site that their use is well suited to the particular site *(ibid.)*. Only those state substantive standards that are identified in a timely manner and that are more stringent than federal requirements are ARARs *(ibid.)*.

To constitute an ARAR, a federal or state standard or requirement must be substantive in nature. Administrative requirements, such as those relating to permitting, documentation, reporting, and record keeping, are not ARARs. In addition, to constitute an ARAR, the standard or requirement must have been formally promulgated by a federal or state agency. Federal and state advisories and guidance documents that have not been formally promulgated as binding laws or regulations do not constitute ARARs. Such items need not be complied with, although they may be considered in formulating a removal action.

In determining whether compliance with an ARAR is practicable, the lead agency may consider all appropriate factors including: 1) the urgency of the situation; and 2) the scope of the removal action (40 CFR 300.415(j)). In addition, even if compliance with an ARAR is deemed practicable based on consideration of the above factors,

compliance may nonetheless be waived under any of the circumstances for which CERCLA allows a waiver for remedial actions (see section 121(d)(4) of CERCLA; 40 CFR 300.430(f)(1)(ii)(C)).

The ARARs identified for the Allendale School Removal Action are set forth in Table 7. That table also includes a proposal regarding attainment of each listed ARAR. Table 7 does not include ARARs for the disposition of materials excavated during this Removal Action; such ARARs will be included in the future Work Plan related to the on-plant consolidation areas.

### 3.4 Development of PCB Soil Removal Limits

The Performance Standards summarized in Section 3.2 of this Work Plan, in combination with the available soils data, were utilized to establish the overall limits of soil subject to removal. This section provides a summary of the approach that was utilized to establish these limits.

The primary objective of the pre-design soil investigations conducted by GE in April and May 1999 was to address certain data needs related to the overall presence of PCBs within the property soils (in addition, certain additional sampling was conducted to supplement the available data related to the presence of non-PCB constituents in soils). In general, the approach used to assess the existing soils data and to identify potential data needs involved an evaluation of the data in two-foot depth increments, as measured from the ground surface prior to the installation of the approximate 2-foot thick soil cover in 1991. Following the performance of the soil investigations, a similar approach was used as the basis for the development of soil removal limits. This approach is summarized below.

For each two-foot depth increment, the results of the pre-design soil investigations were combined with the prior analytical data, and then reviewed to assess the presence of PCBs at levels greater than 2 ppm. A depth increment of two feet was selected for this evaluation since the majority of the prior soil investigations involved soil sampling and analysis in two-foot depth increments. Within each depth increment, the horizontal extent of PCBs at levels exceeding 2 ppm, has been determined by first identifying, for each two-foot depth increment, the location of discrete samples where the PCB concentration exceeds 2 ppm. The initial limits of soil removal were then constructed using the mid-point locations between those discrete sample locations exceeding 2 ppm and those adjacent sampling locations where the PCB results are below 2 ppm. Figures 6 through 11 identify the initial removal limits developed for each depth increment using this approach. (The limits shown on these figures do not include soil removal within the 25-foot wide strip located along the rear portion of the school building. These soils

are subject to a different Performance Standard, and have been evaluated as described below and in Attachment A.) By overlaying the individual removal limits constructed for each depth increment, a three dimensional depiction of the removal limits results can be identified. With some refinements to account for existing site elevations and constructability issues, the soil removal limits necessary to achieve the Performance Standards identified in Section 3.2 of this Work Plan can be identified. The proposed soil removal limits are depicted on Figure 12. In addition to the information shown on Figure 12, several comments are presented below to describe/clarify certain aspects of the proposed soil removal limits.

1. The use of a mid-point approach for establishing the initial limits of soil removal has been discussed with USEPA and MDEP. In implementing this approach, some post-excavation soil sampling and analysis (to confirm that the appropriate Performance Standards have been achieved) will be performed as discussed in Section 4.5.2 of this Work Plan.

2. The initial removal limits shown on Figure 12 represent the overall horizontal and vertical extent of soil removal necessary to achieve the applicable Performance Standards. However, as discussed in Section 3.5 below, certain areas of soil within the overall removal limits have been identified for separate handling and disposition, once the soils are excavated.

3. The removal limits shown on Figure 12 represent the minimum soil removal requirements that will be imposed on the contractor(s) selected to perform this project. From a constructabilty perspective, it may be necessary and appropriate to remove soils from areas not specifically targeted for removal to provide accessibility to deeper soils requiring removal, to provide an adequate excavation side slope, etc. Throughout the performance of the Removal Action, survey control will be maintained to monitor the contractor's progress and to ensure compliance with the minimum soil removal requirements.

4. The vertical extent of removal shown on Figure 12 has been determined based on information regarding the surface elevation and sampling depths of the discrete sampling locations dictating the need for soil removal. For example, for each area identified for soil removal on Figure 12, the vertical extent of soil removal is presented in terms of depth relative to the existing grade (in the absence of the two-foot thick soil cover), and in terms of elevation relative to USGS survey datum. This information was derived based on those sample locations that were utilized to develop the horizontal limits of removal, and specifically

information concerning sample locations, ground surface elevation, thickness of surface cover, and depth-specific PCB concentrations.

5. For the soils that are present within an approximate 25-foot wide strip located along the rear portion of the school building, the available soil data (174 samples from 101 locations) indicate that the first 4 feet of soil do not contain PCBs above 2 ppm. In addition, as presented in Attachment A to this Work Plan, an evaluation of these data indicate that the spatial average PCB concentration in this 25-foot wide strip is less than 2 ppm. Therefore, in accordance with the Performance Standards outlined in Section 3.2 of this Work Plan, soil removal within this 25-foot strip is not required.

### 3.5 Disposition of Excavated Materials

Consistent with the settlement agreement between GE and the Agencies, certain of the soils excavated from the property may be re-used as backfill material during site restoration activities, while other soils will be removed from the Property and transported for permanent consolidation at one of two designated on-plant consolidation areas within the GE facility. This section describes the disposition alternatives that are applicable for the Property soils subject to excavation, including the disposition location (i.e., on-plant consolidation vs. re-use as backfill material) and limitations regarding each alternative. In addition, this section presents the methods that were used to establish the limits for each type of disposition alternative.

In certain instances within the Property, it is necessary to remove soils that contain less than 2 ppm PCBs in order to gain access to deeper soils that contain greater than 2 ppm and thus require removal. For areas where a significant volume of soil containing less than 2 ppm can effectively be removed, such materials will be separately removed, staged, and reused as soil backfill material following the completion of the soil removal actions. Such material will include the existing 2-foot soil cover that was installed by GE in 1991. At the time of its installation, sampling of the materials used in the construction of the soil cover were shown to contain non-detectable levels of PCBs, while sampling of the installed cap materials in 1997 confirmed that PCBs were not present in these soils. Based on the anticipated soil removal limits shown on Figure 12, approximately 3.3 acres of the existing soil cover will need to be removed in order to access the underlying soils. This area equates to an approximate 11,000 cubic yard volume of soil that will be used as backfill material. Several other areas within the Property will also be subject to excavation, staging, and re-use as backfill material. The locations and depths of these areas are shown

on Figure 14. In total, approximately 13,000 cubic yards of soil currently present within the Property will be subject to excavation, separate staging, and re-use as backfill material.

The majority of the soils to be excavated from the Property will be transported to one of two on-plant consolidation areas within the GE Plant Area. These two areas -- the Hill 78 Consolidation Area and the Building 71 Consolidation Area -- are in close proximity to the Property, as shown on Figure 2. From an overall perspective, there are certain limitations regarding the types of material that can and cannot be consolidated within the GE facility. For example, specifically excluded from any on-plant consolidation are free liquids, free product, intact drums and capacitors, and other equipment that contains PCBs within its internal components (such materials will, if present within the Property, be transported to an appropriate off-site facility for disposal). Materials prohibited from on-plant consolidation are not expected to be encountered during the proposed removal actions. In addition, materials to be placed within the Hill 78 Consolidation Area are required to be limited to materials that contain less than 50 ppm PCBs (as determined by an appropriate composite sampling technique or other technique approved by USEPA) and that are not classified as a hazardous waste under applicable regulations pursuant to the Resource Conservation Recovery Act (RCRA). Materials that contain 50 ppm PCBs or greater (referred to herein as Toxic Substances Control Act, or TSCA, materials) or that constitute RCRA hazardous waste will be placed within the Building 71 Consolidation Area.

Based on review of the available Appendix IX+3 data, it appears that the soils subject to removal at the Property do not constitute RCRA hazardous waste. Although several constituents are present at detectable levels, the concentrations of these constituents are low enough that they would not be expected to exceed allowable extract levels if subject to analytical testing using the Toxicity Characteristic Leaching Procedure (TCLP). Specifically, a conservative evaluation of the soils data can be conducted by dividing the soil sample results (expressed as mg/kg, or parts per million) by 20, changing the reporting units from mg/kg to micrograms per liter, and comparing the converted results to the allowable extract concentration limits associated with the TCLP procedure. This approach, which is commonly utilized by waste disposal companies to screen wastes for RCRA hazardous waste characteristics, is beneficial as an initial screening tool. In addition, if certain exceedances result from this screening exercise, the locations and depths subject to more detailed evaluation (e.g., TCLP testing) can be identified. For the non-PCB soil data associated with the Property, the results of this RCRA screening exercise indicate that there are no exceedances of the TCLP allowable extract concentrations. Therefore, the segregation of materials for subsequent consolidation at either the Hill 78 or Building 71 Consolidation Areas will be based on the PCB concentration at which the material would be considered to be TSCA material (i.e., 50 ppm and greater).

The extent of soils containing PCBs at levels of 50 ppm and greater has been estimated using an approach involving linear interpolation between those sample locations exceeding 50 ppm and neighboring sampling locations where the PCB results are below 50 ppm. This approach is more conservative than a composite sampling or other averaging technique (which would be allowed under the parties' settlement agreement) for determining whether soils contain less than 50 ppm PCBs and thus can be consolidated at the Hill 78 Consolidation Area. Figures 6 through 8 identify the estimated 50 ppm PCB isopleth developed for each depth increment where PCBs greater than 50 ppm have been detected. By overlaying the individual 50 ppm PCB isopleths for these depth increments, the overall horizontal and vertical limits of TSCA material subject to consolidation at the Building 71 Consolidation Area have been estimated, and are illustrated on Figure 13. With the incorporation of site elevations and constructability issues, the results of the evaluation described above have been incorporated into the proposed soil removal limits for the Property, as shown on Figure 12. Based on the approach described above, the volume of soil subject to possible consolidation as TSCA material is approximately 5,000 cubic yards.

The areas, depths, and volume of soils preliminarily identified as containing greater than 50 ppm PCBs serves as the starting point for further evaluations concerning the final disposition of these soils. At a minimum, GE will separately remove and handle these materials. However, upon their removal, GE may elect to perform additional sampling of the excavated materials prior to their placement within the Building 71 Consolidation Area (in an effort to conserve the future capacity of that consolidation area). If GE elects to conduct additional characterization sampling of the ex-situ soils, the materials will be placed in a secure stockpile area for subsequent sampling activities. Such sampling would typically consist of 1 composite sample for every 200 cubic yards of soil, with each composite sample composed of 10 to 15 grab samples collected from representative sample locations within the stockpile area. Each 200-cubic yard volume of soil subject to additional characterization sampling will be securely maintained until such time that the results are available and a decision is made regarding the ultimate disposition of this soil.

### 3.6 Evaluation of Non-PCB Constituents

One of the Performance Standards identified in Section 3.2 of this Work Plan is related to the presence of non-PCB constituents in Property soils. Consistent with the approach that has been discussed with the Agencies since the September 1998 settlement agreement, GE has performed an evaluation of the available non-PCB soil data to assess the need for response actions to address non-PCB constituents. A summary of this evaluation is presented below, while Tables 8 through 11 present certain of the evaluation details.

The initial step in the evaluation of non-PCB constituents was to establish the data set, constituents, and constituent concentrations subject to evaluation. As described in Section 2.3.2 of this Work Plan, 49 samples from 35 locations within the Property have been collected and analyzed for some or all of the Appendix IX+3 constituents. For the purposes of this evaluation, this data set has been modified to reflect the anticipated performance of response actions proposed for PCBs. Specifically, resulting from the proposed response actions for PCBs, several of the existing Appendix IX+3 soil samples (and adjacent soils) will be removed from the Property, and replaced by backfill material. Of the 49 soil samples that have been analyzed for some or all of the Appendix IX+3 constituents, 20 will be removed as part of the proposed PCB soil excavation. To account for this soil removal, while still maintaining the number of samples included in the existing data set, the Appendix IX+3 constituent concentrations for the sample locations where soil will be removed and replaced were assumed to be consistent with the backfill materials (for the purposes of this evaluation, the concentration of organic constituents in the backfill material was assumed to be ½ the typical analytical detection limit, while analytical data from the likely backfill sources was used to estimate the concentration of the inorganic constituents). The modified data set was then subject to further evaluation as described below.

A sequential evaluation of the non-PCB data set (modified, as discussed above, to reflect the anticipated PCB response actions) was then conducted. For this particular application, the data set was considered in two separate depth increments -- data corresponding to the uppermost one foot of soil (i.e., surface soils), and the overall data set considering the combined surface and subsurface soil data. Once these two data sets were established, the maximum, median and, in some cases, the arithmetic average of each of the detected constituents was subject to one or more evaluations/comparisons. As described below, the results of these evaluations indicate that no further response actions (beyond those proposed for PCBs) are necessary to address the presence of non-PCB constituents in soil.

For surface soils within the Property (i.e., from within the uppermost one foot), 14 samples from 12 locations have been analyzed for some or all of the Appendix IX+3 constituents. This data set was evaluated in accordance with the Performance Standards established in Section 3.2 of this Work Plan. A summary is presented below, and presented in Tables 8 and 9.

1. With respect to the dioxins/furans, the available data set was evaluated based on total Toxic Equivalent (TEQ) concentrations using the consensus Toxicity Equivalency Factors (TEFs) published by the World Health Organization. Since the maximum TEQ concentration of the individual samples contained in this

data set is below the 1 ppb dioxin PRG for residential areas established in USEPA OSWER Directive 9200.4-26 (April 13, 1998), no further response actions are necessary to address dioxins/furans.

2. For constituents other than dioxins/furans, the maximum concentration of each detected constituent from among the samples contained in this data set was compared to the corresponding USEPA Region 9 PRGs for residential areas. (For polycyclic aromatic hydrocarbons (PAHs) for which there are no Region 9 PRGs, the PRG for benzo(a)pyrene was used for carcinogenic PAHs and the PRG for naphthalene was used for non-carcinogenic PAHs, per USEPA approval.) From this comparison, a total of five constituents were detected in at least one sample at a concentration above their applicable PRGs, as shown in Table 8. These constituents, plus sulfide (for which there is no PRG), were retained for further evaluation as discussed below.

3. For the six constituents identified in Step 2 above, the available data set was compared to background conditions using a summary statistics approach described in MDEP guidance. In general, this approach involves a comparison of the median and maximum concentrations of a given constituent in the site data set to the median and maximum constituent concentrations associated with background conditions, with a 50% tolerance if either the maximum or median concentration from the site exceeds background but the other does not. For this evaluation, background conditions were established using soil data collected from the Housatonic River floodplain upstream of releases from the GE facility. The results of this comparison (using summary statistics) identified three constituents at concentrations considered above background -- dibenz(a,h)anthracene, indeno(1,2,3-cd)pyrene, and sulfide (Table 9). With respect to dibenz(a,h)anthracene and indeno(1,2,3-cd)pyrene, the arithmetic average concentration of the samples associated with the Property data set (Table 9) was determined to be less the applicable Method 1 S-1 soil standards contained in the MCP. Since there are no MCP Method 1 standards (or PRGs) for sulfide, sulfide was further evaluated in relation to background levels. As shown in Table 9, the maximum and median concentrations of sulfide at the Property are only slightly higher than the corresponding background concentrations. As a result, it was determined that no further response actions are necessary to address this inorganic constituent.

Based on this evaluation, no further response actions are necessary to address non-PCB constituents present in the top one foot of soil at the Property following the performance of the response actions to address PCBs.

For the combined surface and subsurface soil data set for the Property (32 samples from 28 locations), a similar evaluation to that presented above for the surface soils was conducted, except that background conditions were established using soil data collected from: (1) residential properties in the vicinity of Pittsfield (excluding data from samples showing detectable PCBs or evidence of fill; (2) the Housatonic River floodplain upstream of releases from the GE facility; and (3) sources of backfill previously utilized (with MDEP approval) to restore other properties subject to response actions. The results of the evaluation are summarized below and on Tables 10 and 11.

1. For dioxins/furans, the maximum TEQ concentration of the individual samples contained in this data set is below 1 ppb (Table 10). Therefore, no further response actions are necessary to address dioxins and furans.

2. For constituents other than dioxins/furans, the maximum concentration of five constituents exceeded their corresponding USEPA Region 9 PRGs (Table 10). These five constituents, plus sulfide, were then subject to additional evaluation as described below.

3. Using summary statistics, it was determined that all but two constituents (dibenz(a,h)anthracene and indeno(1,2,3-cd)pyrene) are present below background conditions (Table 11). However, the arithmetic average concentration of these two constituents is below the applicable MCP Method 1 S-1 soil standards (Table 11).

Based on this evaluation, it is concluded that no further response actions are necessary to address non-PCB constituents in subsurface soils within the Property.

# 4. Removal Action Implementation Plan

## 4.1 General

The information presented in Section 3 of this Work Plan focused on the design of the proposed Removal Action by first establishing removal action objectives and then identifying the soil removal limits necessary to achieve those objectives. This section of the Work Plan provides information concerning the various activities associated with the implementation and performance of the proposed Removal Action. Included in this section is general information concerning the following topics:

- Project organization and roles;
- Pre-mobilization activities;
- Site preparation activities;
- Soil excavation, handling, and consolidation;
- Post-excavation confirmatory sampling;
- Site restoration;
- Project documentation and reporting; and
- Post-restoration monitoring.

The overall contents of this section of the Work Plan are general in nature and potentially subject to modification prior to or during the performance of the proposed Removal Action. However, as discussed in Section 1 of this Work Plan, the majority of the information presented in this section is not critical in terms of Agency review and approval, especially given the expedited schedule available to conduct this work. As a result, an overall summary of the anticipated activities associated with the Removal Action is sufficient. In addition, concurrent with Agencies' review of this Work Plan, GE will solicit proposals from qualified contractors for the performance of the Removal Action. Once a contractor is identified, the successful contractor will prepare (with involvement and input from GE) a series of submittals to support the performance of the required Removal Action. Included in these submittals to GE will be a Site Operations Plan; a Health, Safety, and Contingency Plan (HSCP), and other information concerning the materials, products, and procedures to be incorporated into the response actions. These submittals serve several purposes, including but not limited to, a demonstration of the contractor's overall understanding of the project scope and requirements, and the contractor's proposed approach, sequence, and schedule for carrying out the Removal Action.

## 4.2 Project Organization and Roles

During the course of conducting the Removal Action at the Property, several different organizations will be involved, with the role of each depending on the particular aspect of the project. This section identifies the organizations expected to be involved with this project, and their associated roles and responsibilities. Included is a listing of key personnel, descriptions of duties, and lines of authority during the Removal Action at the Property. Additional information regarding the organizations/personnel and their associated responsibilities is provided below.

### 4.2.1 United States Environmental Protection Agency

The USEPA will serve as the lead regulatory agency for this project. The USEPA will provide an On-Scene Coordinator (OSC) to coordinate the USEPA's involvement and to receive all notices, reports, plans, and other documents prior to, during, and following the project. The identified OSC for this project is:

Chester L. Janowski
U.S. Environmental Protection Agency
Site Evaluation and Response Section I (HBR)
One Congress Street
Boston, MA 02203
(617) 918-1282
Fax (617) 918-1291

In addition to the OSC, other USEPA personnel (or designated contractors) will be involved in this project, and likely provide a continuous on-site presence during the Removal Action. However, absence of a USEPA representative at the Property will not be cause for delay or stoppage of work, unless specifically directed by the OSC. Where necessary, the USEPA will be responsible for coordinating efforts of other regulatory agencies (e.g., the MDEP).

### 4.2.2 Massachusetts Department of Environmental Protection

The MDEP will assist the USEPA in reviewing and overseeing the various RD/RA activities associated with this Removal Action. The MDEP will provide a Project Manager to administer MDEP's responsibilities and all notices, reports, plans, and other documents prior to, during, and following the project. The identified MDEP Project Manager for this project is:

John Ziegler
Project Manager
Bureau of Waste Site Cleanup
Department of Environmental Protection
436 Dwight Street
Springfield, MA 01103
(413) 755-2250
Fax (413) 784-1149

### 4.2.3 General Electric Company

GE will be responsible for the overall performance and management of the Removal Action. Such responsibilities include, but are not limited to, the following:

- Serve as primary point of contact with the USEPA, MDEP, and local officials;
- Review all written notices, reports, plans, and other documents prior to submittal to the Agencies;
- Provide updates of project activities and schedules to the Agencies;
- Assess and resolve potential modifications to the proposed response actions, and communicate proposed modifications to the Agencies;
- Direct/coordinate activities of the contractor, supervising contractor, and other GE-contracted organizations involved with this project;
- Ensure that all work is performed in conformity with the conditions of this Work Plan and associated submittals;
- Conduct construction progress meetings and monitor quality assurance/quality control (QA/QC);
- Coordinate the performance of this and other concurrent removal actions and consolidation activities within the Pittsfield/Housatonic River Site;

- Prepare a Final Completion Report; and

- Coordinate the performance of post-Removal Action activities.

GE will provide a Project Coordinator to administer GE's role on this project. The identified GE Project Coordinator for this project is:

Richard W. Gates
General Electric Company
100 Woodlawn Avenue
Building 11-250
Pittsfield, MA 01201
(413) 494-2176
Fax (413) 494-2700

### 4.2.4 Supervising Contractor

GE will utilize a supervising contractor to assist in the overall management of the removal actions. Responsibilities of the supervising contractor include, but are not limited to, the following:

- Review various submittals provided by the Contractor;

- Provide on-site observation of the Removal Action;

- Provide documentation of the Removal Action activities;

- Provide technical assistance/issue resolution related to the implementation of the Removal Action;

- Implement monitoring activities, prior to, during, and following removal/restoration activities;

- Assist GE in verifying that the Removal Action is complete and performed in accordance with this Work Plan; and

- Prepare and submit the Final Completion Report summarizing removal/restoration activities.

For this project, GE will utilize Blasland, Bouck & Lee, Inc. (BBL) as the supervising contractor. BBL's primary contact will be:

James M. Nuss, P.E., LSP
Blasland, Bouck & Lee, Inc.
6723 Towpath Road, P.O. Box 66
Syracuse, NY 13214-0066
(315) 446-9120
Fax (315) 445-9161

### 4.2.5 Contractor

GE will select one or more contractors to perform the activities associated with this Removal Action. The primary role of the contractor will be to implement the activities outlined in this Work Plan and provide all labor, materials, equipment, and services necessary to complete the Removal Action. Additionally, the Contractor will participate in construction progress meetings to address the project status, schedule, test results, observations and findings, technical issues, design changes, and upcoming activities.

## 4.3 Pre-Mobilization Activities

Subsequent to the submittal of this Work Plan and prior to the initiation of on-site activities at the Property, a number of pre-mobilization activities will be conducted. As previously described, concurrent with Agency review of this Work Plan, GE will perform activities toward the selection of a contractor to conduct the Removal Action. Included in this effort will be the preparation of a Request for Proposal (including technical drawings and specifications), a pre-bid meeting and site visit with prospective contractors, receipt and analysis of contractor proposals, and the identification of and contracting with the selected contractor. As discussed in Section 5 of this Work Plan, the activities described above will be completed in late June to allow initiation of on-site soil removal activities shortly thereafter following Agency approval of this Work Plan and lodging of the Consent Decree.

Following its selection, the contractor will be required to prepare, and submit to GE for review, several documents, which will include, but will not be limited to the following:

- Health, Safety, and Contingency Plan;

- Site Operations Plan;

- Work schedule;

- A summary of materials and procedures to be used;

- Name, locations, and quantity of proposed backfill materials; and

- Name(s) of subcontractor(s) to be used for the project.

Collectively, the above submittals are intended to demonstrate that the contractor (a) has an adequate understanding of the scope of the Removal Action; (b) has developed a project sequence that can efficiently perform all on-site activities within the allowable schedule; (c) will utilize acceptable materials, products, and procedures; and (d) will perform all activities in a manner that is protective of on-site workers and the surrounding community. Two of the submittals identified above -- the Health, Safety, and Contingency Plan (HSCP) and the Site Operations Plan -- are discussed in more detail below.

The contractor selected to perform the removal actions will be required to implement a project-specific HSCP. This project-specific HSCP must meet the minimum requirements established in the *General Facility Health and Safety Plan* (GE, July 1997), and 29 CFR 1910 and 1926. The plan must address those activities scheduled to be undertaken by the contractor and present required information including, but not limited to, training, identification of key personnel (including the contractor's Health and Safety Officer), medical surveillance, site hazards, work zones, personal safety equipment and protective clothing, personal air monitoring, equipment cleaning, and material safety data sheets. A Contingency Plan will also be included within the HSCP, and will set forth procedures for responding to emergency conditions or events that may occur during the performance of the Removal Action.

In addition to the preparation of the HSCP by the contractor, any other contractors or subcontractors to either GE or the primary contractor will be responsible for developing and implementing a task-specific worker health and safety plan. The same requirements/provisions referenced above regarding the HSCP will be addressed in each task-specific plan.

The purpose of the Site Operations Plan will be to summarize the materials, procedures, timelines, and controls that the Contractor intends to utilize during removal activities. This plan will be prepared in consultation with GE and its supervising contractor and will address, but not be limited to, the following items:

- Detailed work schedule;
- Proposed excavation stabilization measures;
- Excavation Plan;
- Materials Handling and Staging Plan;
- Dewatering and Water Management Plan;
- Equipment cleaning procedures;
- List of equipment to be used on-site;
- Property protection procedures; and
- Dust control measures.

Separate from the coordination activities and project-related submittals described above, GE will conduct one or more project kick-off meetings with personnel from the USEPA, MDEP, and City and School Officials. The intent of these meetings will be to discuss the anticipated project sequence and schedule, present any modifications to the Removal Action as presented in this Work Plan, summarize the health, safety, contingency, and security measures that will be implemented and maintained during the Removal Action, and discuss specific questions and concerns identified by the meeting attendees.

Finally, concurrent with the RD/RA activities described herein for the Property, GE is conducting similar activities for two other areas associated with the Pittsfield/Housatonic River Site. Specifically, activities toward the initiation of bank soil and sediment removal actions associated with the first ½-Mile Reach of the Housatonic River (i.e.,

between Newell Street and Lyman Street) are ongoing, while the preparation and construction of on-plant consolidation areas at the Hill 78 and Building 71 areas will also be conducted concurrently.

## 4.4 Site Preparation Activities

Several activities will be performed prior to the initiation of intrusive soil removal activities. These activities include initial site survey and layout; site controls and access; contractor mobilization; utility clearances and relocation; erosion and sedimentation control measures; removal and disposal of surface vegetation and other surface features; and preparation (as needed) of necessary support areas related to the Removal Action, including equipment and soil staging areas, temporary access roads, and material dewatering areas. The general scope of each of these activities is provided below.

### 4.4.1 Surveying and Site Layout

Prior to the commencement of soil removal activities, a detailed site survey will be conducted. Included in this survey activity will be the following:

- Re-establishment of the existing survey control and baseline information;
- General layout of the anticipated site operations (e.g., staging areas, removal areas, etc.);
- Locations of above- and below-grade utilities and site features that may be affected by the subsequent Removal Action; and
- Initial horizontal limits of soil removal, and sub-areas therein based on various staging/consolidation considerations.

Survey control will play a vital role in the performance, monitoring, and confirmation of the proposed Removal Action. As can be seen on Figures 6 through 15, there are a significant number of areas and depths from which soil removal will be performed. In addition, within several excavation areas, certain disposition considerations further complicate the excavation activities. As a result, throughout the Removal Action extensive survey control will be necessary.

### 4.4.2 Site Controls and Access

Currently, vehicular access to the Property is limited to a single direction of access from Connecticut Avenue located north of the removal area; the remaining perimeter of the Property is fenced or access-impeded by guardrails. Pedestrian access is also limited to the Connecticut Avenue area, with the exception of an approximately 50-foot wide area located in the southeast corner of the Property near Virginia Avenue and California Avenue (at this location, the perimeter fencing is interrupted by guardrails). During the performance of the Removal Action, these measures will be supplemented by additional security measures and procedures to restrict unauthorized access, minimize disruptions to the ongoing response actions, and to promote a safe work environment. The anticipated security measures are further discussed below.

- **Temporary Fencing/Barricades** - The existing perimeter fence currently in place to minimize access to the subject areas will be maintained and will be supplemented by temporary construction fencing to delineate and secure areas of the ongoing removal actions. Such fencing would be constructed of high density polyethylene, at least 4 feet in height, adequately and securely installed, and with a high visibility color (other fencing configurations of equivalent performance may be considered). Temporary barricades would likely consist of wood construction or concrete Jersey Barriers.

- **Surveillance During Remediation** - During the Removal Action, it is anticipated that all on-site personnel will provide ongoing surveillance during site activities and alert appropriate personnel in the event that potential security issues are identified.

- **Sign In/Out Sheet** - For the duration of the Removal Action, a sign in/out sheet will be maintained for the Property. All project personnel and site visitors will be required to sign in upon entering the site and sign out upon leaving.

- **Implementation of Safe Work Practices** - Implementation of safe work practices will provide for additional site security during the response actions. Such practices will include the following:

  - maintaining temporary construction fencing around all open excavations and other potentially dangerous areas;
  - parking heavy equipment in a designated area each night and removing keys;

- < maintaining an organized work area, including proper storage of all tools and equipment; and
- < conducting a security review and check at the conclusion of each day.

### 4.4.3 Contractor Mobilization

Prior to the start of the on-site response actions, the Contractor will mobilize the appropriate personnel, subcontractors, equipment, and materials to the Property. The mobilization of these items may occur in phases or as needed based on the specific purpose and timing of their use. In addition to the above, the contractor will also mobilize temporary office and sanitary facilities. All materials, equipment, etc. brought on to the site will be located in an area that will not interfere with subsequent response actions.

### 4.4.4 Utility Clearances and Relocation

Underground and aboveground utilities that could potentially be affected by the proposed response actions will be identified prior to the start of the response actions. As was done in connection with the investigation phases of this project, commercially owned utilities will be demarcated by an independent company (DIGSAFE). Additionally, as indicated in Section 4.4.1, a detailed site survey will be performed prior to the commencement of soil excavations to confirm/locate subsurface utilities at the Property which may be affected by the soil removal actions, and not otherwise demarcated by DIGSAFE.

Based on available mapping of below-grade utilities within the Property (Figure 3), several public and property-specific utilities are located within the proposed removal limits. These include, but may not be limited to:

- C 8-inch sanitary sewer line (and related appurtances) that traverses south of the school building and then in a general north-south direction through the western portion of the Property;

- C 42-inch stormwater line (and related appurtances) that traverses in a general north-south direction through the western portion of the Property;

- C 12-inch, 24-inch, and 30-inch stormwater lines (and related appurtences) that are located in the southern portion of the Property and run in a general east-west direction; and

- near-surface yard drainage network comprised of 6-inch perforated pipes located within a gravel-pack trench. This drainage network was installed in conjunction with the installation of the 2-foot thick soil cover in 1991.

At least portions of each of the above pipelines are located within the proposed soil removal limits and are likely to require special precautions during the removal of soil from adjacent areas. The type and extent of the precautions will be determined based on consideration of a number of factors, including the size and condition of the pipelines, horizontal and vertical location relative to the proposed removal limits, operational conditions, etc. Based on these types of assessment activities, the appropriate precautions will be selected and implemented, and could include one or more of the following:

- Demarcation and protection of utilities during the removal actions;

- Temporary bracing and support of utilities exposed during soil removal actions;

- Removal of portions of the existing utilities, with provisions for temporary service (i.e., bypass piping/pumping, re-routing, use of storage tanks, etc.); and

- Removal of utilities and subsequent replacement as part of Property restoration activities.

Details regarding utility-related precautions will be identified by GE and its contractors and will be incorporated into the Site Operations Plan. As necessary, GE will communicate its plan for protecting, re-routing, etc. the affected utilities to the appropriate organizations (city and/or utility companies).

### 4.4.5 Erosion and Sedimentation Control Measures

During the performance of soil removal actions, various measures will be implemented, monitored, and maintained to minimize the potential for migration of PCBs via rainfall runoff/runon, airborne pathways (i.e., windblown dust), or mechanical transport (i.e., soil tracking on transport vehicles). Several of these measures are related to the contractor's activities (and related monitoring) during the performance of the Removal Action. However, certain activities will be performed as part of overall site preparation activities. These include erosion control measures (discussed below) and construction of soil staging/stockpile areas and temporary access roads (Section 4.4.6).

Erosion and sedimentation control measures will be implemented to prevent erosion of exposed soils and subsequent accumulation of materials in site drainage pathways. In addition, these measures would be used to divert rainfall runoff from contacting any soil stockpile areas and/or entering work areas and open excavations. The selection of specific erosion control measures for the Removal Action will depend on the scope of activities, site topography, type of existing ground cover, and maintenance considerations. The control measures that may be utilized include siltation fences, staked hay bales, and diversion trenches/berms. These measures would be maintained for the duration of site activities until such time that restoration activities have provided a final vegetative cover in all areas. During this time, erosion controls will be inspected on a regular basis and maintained as necessary. Additional details regarding each of the anticipated control measures are briefly described below.

Siltation Fences

Siltation fences are utilized to divert and/or limit the velocities of overland flow and flow in drainage channels. Siltation fences consist of a geotextile fabric material suspended between support posts and anchored to the ground. A wire mesh fence may also be installed on the downgradient side of the fabric to provide support. As surface water approaches the siltation fence, it is either diverted around downgradient areas or filtered through the fabric material, depending upon the orientation and intent of the siltation fence. When utilized as a diversion method, the siltation fence limits the amount of surface water which contacts downstream areas. When utilized as a filter, the siltation fence limits the velocity and the amount of suspended materials in the runoff water, thus limiting the downstream transport of soils.

Staked Hay Bales

Similar to siltation fences, staked hay bales minimize velocities associated with overland flow. Hay bales limit the velocity of the flow and provide filtration to minimize the downgradient migration of suspended soils. Hay bales may be installed around the perimeter(s) of work areas and soil stockpile areas as required, and would be secured to the existing ground surface by wooden stakes.

Diversion Trenches/Berms

Diversion trenches and/or berms are another means of diverting surface water runoff around soil stockpiles and excavation areas. In this case, surface soils would be removed and stockpiled immediately upgradient and

adjacent to the area from which it was removed (alternatively, clean off-site soils may be utilized to create an earthen berm). This provides a means for intercepting and diverting runoff before it contacts downgradient areas. If necessary, diversion trenches and berms would be supplemented by the use of staked hay bales or siltation fencing. Diversion trenches would be constructed in such a way as to minimize the flow velocity in the trench to avoid scouring of the trench soils.

### 4.4.6 Construction and Use of Soil Staging Areas

During the course of performing the soil removal activities (and related handling, consolidation, etc.) described in this Work Plan, temporary stockpiling and staging of excavated soils will likely be needed. Placement of materials into a stockpile area prior to their final disposition is anticipated for the following reasons:

- Excavated soils containing less than 2 ppm PCBs will be staged to allow their re-use as backfill materials;
- Soil stockpiling may be beneficial and appropriate to allow coordination between soil removal and soil transport activities;
- Excavated soils may be stockpiled to allow sampling and analysis activities prior to disposition;
- Soils excavated from below the water table will likely require dewatering prior to their final disposition; and
- Clean material from an off-site location may be brought onto the Property to facilitate backfilling/restoration activities.

The location and specific construction of temporary soil staging areas will depend on specific circumstances. However, certain provisions will apply to any stockpile/staging area to minimize the potential for soil migration due to wind- and rainfall-related factors, such as:

- Staging areas will not be established in locations which may interfere with response actions, or related traffic flow. In addition, the location of any staging area will consider site topography and avoid (to the extent possible) possible rainfall drainage areas;

- Staging areas will not be established in or near water courses or drainage ditches;

- To minimize potential erosion and migration issues, only a manageable volume of soil will be included in a given staging area;

- Except when soils are actively being placed or loaded, the staged materials will be continuously covered by a properly anchored impermeable membrane. This membrane will be maintained for the duration of soil staging activities;

- Erosion and sedimentation control measures (e.g., staked hay bales, silt fencing, diversion trenches, earthen berms, etc.) will be utilized; and

- Staging areas will be inspected daily and any noted deficiencies will be promptly addressed.

### 4.4.7 Removal and Disposal of Vegetation and Other Surface Features

To facilitate access to the soils subject to removal, existing vegetation may be removed from the Property. All material cleared from above-grade (i.e., trees/shrubs/branches, etc.) will be handled in a manner that will prevent contact with soils subject to excavation and consolidation. GE will evaluate appropriate disposal options for these materials, including an off-site location or other remote area within the GE Plant Area (large accumulations of vegetative materials will not be placed within the on-plant consolidation areas). All material cleared from at or below grade (i.e., tree stumps/roots, surface debris, pavement, etc.) will be subject to disposal at the appropriate on-plant consolidation area used for the soil from which the material was removed.

### 4.4.8 Temporary Access Roads

To facilitate the movement of construction equipment within the Property, and the transport of excavated soils to the on-plant consolidation areas, temporary access roads will be constructed within the Property. Such roads will likely involve the placement of a geotextile layer followed by a 6- to 12-inch layer of crushed stone or other suitable material.

## 4.5 Soil Excavation, Handling, and Consolidation

With respect to soil removal, the information presented in this Work Plan focuses on the overall limits of excavation, and those areas and depths within the overall limits that are subject to separate handling, consolidation, and other disposition activities. As presented in Section 3 of this Work Plan, the following soil volumes have been estimated:

| Soil Category | Approximate In-Situ Volume (Cubic Yards) |
|---|---|
| Overall Soil Removal Volume | 42,000 |
| Volume < 2 ppm PCBs[1] | 13,000 |
| Volume > 2 ppm and < 50 ppm PCBs[2] | 24,000 |
| Volume > 50 ppm PCBs[3] | 5,000 |

Notes:

[1] These materials will be staged on-site and utilized as backfill materials.

[2] Consolidation to occur at the Hill 78 Consolidation Area.

[3] Consolidation to occur at the Building 71 Consolidation Area.

This section summarizes some of the activities involved in the removal, handling, and final disposition/consolidation of soil excavated as part of the Removal Action. Although a general overview is provided herein, the methods and sequencing of excavation activities (and related efforts) will be developed in more detail by GE and its contractors prior to the initiation of the Removal Action.

### 4.5.1 Soil Excavation

Given the timeframe available to conduct the proposed Removal Action, a comprehensive excavation plan will be developed prior to the initiation of soil removal. Such a plan will be initiated once GE has selected a contractor, and will involve a coordinated effort between the selected contractor, GE, and GE's supervising contractor. The overall objective of the excavation plan is to identify the procedures, equipment, sequencing, and manpower necessary to perform the necessary soil removal within the available timeframe. In addition to the excavation of soil to the removal limits shown on Figure 12, several other factors will be considered in developing the excavation plan, including, but not limited to, the following:

- The staging of the existing soil cover materials, as well as other relatively large soil volumes containing less than 2 ppm PCBs (see Section 4.5.2);

- The sequencing of excavation and transport of soils based on their PCB concentration and subsequent consolidation at either the Hill 78 or Building 71 Consolidation Areas (see Section 4.5.2);

- The excavation of saturated soils from beneath the water table, and their subsequent dewatering prior to consolidation (see Section 4.5.3);

- The need for and time involved with conducting various survey activities to identify, monitor, and verify the proposed removal limits;

- The sequencing of excavation activities to facilitate the concurrent placement and compaction of backfill, and other restoration activities;

- Protection of existing utilities, or alternatively, the abandonment and temporary replacement of such utilities;

- Provisions for on-site stockpiling and staging in lieu of direct soil loading into transport vehicles; and

- Provisions for excavation side slope stability.

With the development of an excavation plan and overall removal action sequence, estimates concerning the type and amount of construction equipment will be available. Although a specific excavation plan will be developed as part of the future Site Operations Plan, it is anticipated that the sequence of soil excavation and subsequent backfill placement will generally involve the removal of soil in a north to south direction (i.e., away from the school building), concurrent with the removal of TSCA materials from throughout the Property. This anticipated approach has been identified for two timing-related reasons: 1) in the event that soil removal within the Property is not fully complete by the time school commences in the fall, the areas still subject to active removal would be located away from the school building and immediately adjacent areas, and 2) the initial and complete removal of the TSCA materials (approximately 5,000 cubic yards) will facilitate the subsequent removal of the remaining non-TSCA soils without delays or work slow-downs associated with contractor transitioning between TSCA and non-TSCA removal areas.

### 4.5.2 Post-Excavation Confirmatory Sampling

Following the removal of soils to the estimated limits shown on Figure 12, GE will conduct confirmatory sampling and analysis to verify that the extent of soil removal is acceptable. The general scope of the post-excavation sampling activities has been discussed with USEPA and MDEP and is anticipated to include the following components:

- The intent of the verification sampling is to confirm that the horizontal limits of removal within a given depth increment are sufficient. As discussed in Section 3.4 of this Work Plan, the initial limits of excavation were generally developed using a mid-point approach;

- Excluded from post-excavation sampling will be those soils associated with the 25-foot wide strip located along the rear portions of the building. These soils are subject to a different Performance Standard (i.e., attainment of a spatial average PCB concentration less than 2 ppm) and, as described in Attachment A, do not require removal.

- Samples will be collected to represent the two-foot depth increment of interest. Along the perimeter of such areas/depths of interest, grab samples will be conducted at an approximate frequency of 4 samples per 100 linear feet, and composited for a single analysis for PCBs;

- Samples will be analyzed at an off-site laboratory under a rapid turnaround time, in accordance with the provisions of GE's *Sampling and Analysis Plan/Data Collection and Analysis Quality Assurance Plan* (SAP/DCAQAP) and;

- A composite sample result below 2 ppm will confirm that acceptable removal has occurred for the area/depth of interest. If a PCB result greater than 2 ppm is realized, then GE shall assess and implement one or more of the following activities:

    - extend the limits of soil removal in an outward direction and re-sample in accordance with the above protocols.

- extend the limits of removal outward until existing soil sample locations (from prior investigations) are encountered that contain PCB levels equal to or less than 2 ppm in the area/depth of interest.

- Re-sample the area/depth of interest, possibly in smaller segments to focus subsequent removal actions.

### 4.5.3 Material Handling

As soils are excavated, and prior to their transport to either the Hill 78 or Building 71 Consolidation Areas (or to staging areas within the Property for re-use as backfill material), a number of intermediate on-site handling activities may be necessary. To ensure that such activities are performed in a manner that minimizes the potential for inadvertent releases to the environment, unsafe conditions for on-site and off-site personnel, and delays or complications in project implementation, several on-site material handling procedures will be implemented.

Soils excavated from the Property will be segregated into the following three categories:

C Soils with PCB concentrations greater than 2 ppm and less than 50 ppm. The limits of these soils are depicted on Figure 12. Approximately 24,000 in-situ cubic yards of soils within this concentration range will be transported to and consolidated at the Hill 78 Consolidation Area;

C Soils with PCB concentrations 50 ppm or greater. Approximately 5,000 in-situ cubic yards of these soils will be excavated to the limits depicted on Figure 13 and transported to and consolidated at the Building 71 Consolidation Area; and

C Existing soils associated with the 1991 soil cover and other soils containing 2 ppm or less PCBs will be reused as backfill material. The limits of staged soils are shown on Figure 14. These soils will be staged on-site in areas depicted on Figure 2 and used for backfill during restoration of the Property. Approximately 13,000 in-situ cubic yards of backfill soil will be staged on-site.

The preferred method for soil disposition will include direct loading of materials as excavated into vehicles for immediate transport to the respective consolidation area or staging area. However, based on site logistics and project scheduling, it may be necessary or beneficial to transport certain excavated materials from the Property to temporary stockpile areas located within the Property, as discussed in Section 4.5.4. To minimize the potential for

the release of soil to the environment during removal and handling activities, the number of times that the excavated material is handled will be minimized. In addition, to minimize the potential for soil migration due to wind- and rainfall-related factors, open excavations will be protected with a cover (e.g., polyethylene sheeting) and anchored when the area is not actively being excavated. Finally, if concerns regarding airborne dust are identified or suspected, provisions will be implemented to keep the open excavation (or excavated soils) moist using a water spray application.

### 4.5.4 Material Dewatering

From a review of the available soil boring logs, groundwater elevation mapping, existing surface topography, and proposed soil removal limits, it is expected that some removal of soils from below the water table will be required. Based on the above information, saturated soils may be present at depths beginning approximately 4 feet below ground surface, although performance of the proposed removal actions during the summer months may increase the depth at which saturated soils are encountered. Assuming that groundwater is present across the site at four feet below grade, approximately 10,000 cubic yards of material may contain excess water and require further actions prior to its consolidation or other on-site use.

Material dewatering will be performed using a variety of methods. However, efforts to lower the water table throughout the Property through groundwater extraction (pumping) in combination with physical cutoff barriers (sheetpiling) will not be implemented. Such an approach is cost prohibitive and could not be installed and operated in the timeframe available for this Removal Action.

In lieu of active/physical dewatering methods, a number of activities will be performed to reduce the water content of the excavated materials and facilitate their subsequent placement in the on-plant consolidation areas. A summary follows:

- Upon initial excavation of the in-situ materials, efforts will be made to immediately minimize the water content by allowing immediate drainage of the excavated materials within the active excavation area.

- Once removed from the active excavation area, the materials will be placed into a temporary dewatering area to promote gravity-based dewatering. To the extent possible, the materials will be placed in an area immediately adjacent to the active excavation and which will be subject to future removal actions. At such

a location, any water released from the excavated materials can drain back into the active excavation, or into the underlying soils subject to future removal. In the event that materials cannot be located in an area as described above, they will be placed in a suitable bermed, impermeable area that includes provisions for collecting water (e.g., a sump or low-point drainage area). Such an area will also be subject to the provisions described in Section 4.4.6.

- Further reductions in the moisture content of the excavated materials may be achieved by mixing the wet soils with other, drier excavated soils, or through the use of dewatering agents or additives (e.g., kiln dust, fly ash, etc.).

- The extent to which the above measures reduce the moisture content of the soils will be determined through the use of the paint filter test.

Although a large-scale site dewatering operation will not be performed (e.g., groundwater cutoff and extraction pumping), certain smaller scale dewatering and water treatment efforts may be considered and utilized, depending on site conditions. In this event, certain provisions beyond those described above will be implemented. The exact scope of these provisions will depend on several factors, including the location, size, and depth of the excavation area within the water table; the rate of water extraction associated with the excavation area; and the anticipated duration of the specific removal activity. For example, localized dewatering efforts may be implemented within portions of the overall excavation limits, possibly through the construction of small bermed areas and/or the use of localized water extraction. Under this type of contingency approach, measures to handle and treat the extracted groundwater would be included. Again, the scope of these measures would be dependent upon site-specific factors, but could include temporary storage with discharge back into the removal area, on-site water treatment and discharge (either into a sanitary sewer, storm sewer, or overland discharge), and/or storage and transport to GE's existing water treatment facility. To address these potential actions/scenarios, GE has included provisions in the RFP requiring the contractor to provide temporary water storage capabilities (40,000 gallons), a mobile on-site treatment facility (50 gpm capacity, involving filtration and carbon adsorption facilities), and related equipment and operations.

Finally, from a constructability perspective, the presence of accumulated water within the excavation area could hinder efforts to segregate soils (by consolidation area) and/or perform survey control and verification. In these instances, such activities will be performed to the extent practicable, and/or will be conducted in a manner to

achieve a conservative outcome. Also following excavation activities, the placement of backfill in areas below the water table will include a granular, permeable material such as run-of-bank fill. Placement of this material will provide a firm working base for subsequent backfilling and compaction efforts.

### 4.5.5 Disposition of Excavated Materials

As previously summarized, there are several potential disposition scenarios for the soils excavated for the Property, including placement into on-plant consolidation areas, on-site staging for re-use as backfill material, and off-site transport and disposal. Information provided in Section 3.4 of this Work Plan and Figures 6 through 14 describe the various areas and depths subject to these disposition scenarios. Also, earlier sections of this Work Plan describe the criteria associated with each of these scenarios.

The Site Operations Plan to be developed by GE and its contractors will identify the logistics involved in the transport and handling of excavated soils prior to their final disposition. In the unlikely event that off-site transport and disposal of materials excavated from the Property is necessary, GE will coordinate such activities to ensure compliance with all applicable federal and state regulations. Vehicles transporting materials over public roads will be appropriately tarped, manifested, and placarded in accordance with appropriate federal RCRA, TSCA, and Department of Transportation (DOT) requirements, as well as any equivalent state requirements.

### 4.5.6 Air Monitoring

During all on-site activities that could potentially produce dust, an air monitoring program for particulates will be conducted to assess potential impacts to ambient air due to these activities, and the need for dust control measures. Such a particulate monitoring program will be in addition to any other monitoring performed by the on-site contractors as part of their overall health and safety monitoring. Such monitoring will be conducted at four stations located in a generally symmetrical pattern around the perimeter of the property, as shown on Figure 2. The specific locations for these stations will be selected based on the location and nature of the site activities, predominant wind direction, location of potential receptors, site accessibility, site security, and existing ambient air monitoring data.

At each station, real-time particulate monitoring will be performed using a MIE dataRAM Model pDR-1000. The dataRAM uses a passive sampling technique and light scattering photometer to determine particulate concentrations. The data RAM has a measurement range of 0.001 to 400 mg/m$^3$. Monitoring will be conducted for approximately

10 hours daily, from 7 am to 5 pm, during construction-related activities. Particulate data will be recorded and averaged by the instruments' datalogger for each hour of the day.

For each day of monitoring and at regular intervals during each day, the particulate data from the downwind monitor will be compared with the data from the background (upwind) monitor. If the average 10-hour $PM_{10}$ concentration at the downwind monitor exceeds the average concentration at the background monitor, the downwind concentrations will then be compared with a notification level of 120 $\mu g/m^3$ (micrograms per cubic meter) -- which represents 80 percent of the current 24-hour National Ambient Air Quality Standard (NAAQS) for $PM_{10}$ (150 $\mu g/m^3$). This level has been selected to allow notice to GE before concentrations reach the level of the 24-hour NAAQS. Any exceedances of the notification level or the NAAQS will be immediately reported to the Agencies, and GE's Project Coordinator will discuss with the Agencies the need for and type of response actions. In the event that perimeter air monitoring action levels are exceeded on a daily average basis, or the instantaneous readings indicate a significant increase in upwind/downwind readings, or visible dust related to site operations is observed, dust control measures will be implemented. Such measures may include water spray, modification of work procedures, and/or suspension of work. If such measures do not result in reductions of perimeter air monitoring levels to below the action levels, work will be stopped pending further evaluation of work practices, potential upwind particulate sources, and additional control measures.

In addition to the above, certain other site controls and practices will be implemented to limit the potential for and amount of dust generation at the Property. These include covering exposed soil areas when not in active use, covering soil stockpiles, reducing vehicle speeds, and utilizing water sprays as necessary (e.g. in roads, work areas, etc.).

### 4.5.7 Equipment Cleaning

Prior to its departure from the Property, any equipment that has contacted or potentially contacted PCBs will be cleaned to minimize the potential for transport of PCBs by mechanical means. In addition, in the event that equipment will be used interchangeably within the Property to excavate, transport, or otherwise handle one or more of the soil categories described in Section 3.4 (related to PCB concentrations), the need for equipment cleaning will be assessed. Equipment cleaning procedures are anticipated to include the following:

- Each transport vehicle will be visually inspected prior to leaving the Property. Accumulations of soil on the vehicle tires or other exterior surfaces will be removed manually or, if necessary, by using a high-pressure water spray in a dedicated wheel wash area; and

- Material handling equipment that has been used to remove PCB-containing soils will be cleaned to remove accumulations of soil on exterior surfaces at the work site. Prior to being used in non-affected areas or handling "clean" materials (e.g., backfill, etc.), the equipment will be cleaned using a high-pressure water spray.

In addition to the above, prior to the removal of equipment and materials that contacted the Property soils, the contractor will be required to complete equipment cleaning and verification activities consistent with TSCA regulations.

## 4.6 Site Restoration

Once soil removal activities have been completed and documented in a given area, site restoration activities will be initiated. Such actions will involve the placement and compaction of clean backfill material, restoration of the final surface area (including placement of sod, pavement, and/or other vegetation), and installation of above-grade facilities to replicate/enhance the existing Property use as a playground area. The following sections describe the site restoration activities to be performed in coordination with the soil removal actions described in this Work Plan (i.e., backfilling, site drainage, and surface cover).

### 4.6.1 Backfilling and Surface Cover Restoration

Once sufficient documentation has been gathered (i.e., survey control and post-excavation confirmatory sampling) indicating that excavation in a certain area is complete, backfilling operations will be initiated. In order to complete the overall removal actions within the available timeframe, backfill delivery, placement, and compaction activities will occur, to the extent possible, concurrent with the performance of soil removal activities from other areas of the Property. Backfill materials will consist of existing on-site material that contains less than 2 ppm PCBs (e.g., the soils associated with the existing two-foot soil cover), as well as materials brought in from an off-site location. For backfill materials originating from an off-site source which has not been previously identified and characterized, GE will submit to USEPA (prior to use of such materials) the name of the proposed source location, and the results of testing and analysis for PCBs and Appendix IX+3 VOCs, metals, and SVOCs.

As appropriate, clean backfill materials will be placed in the excavation subgrade to within 4 to 6 inches of the final restoration grade (clean topsoil and sod will then be installed to achieve the pre-excavation grade). Where the depth of excavation is greater than two feet, the backfill materials will be placed in lifts and a small compactor will be utilized to compact the materials and minimize the potential for future settlement. In addition, backfill placement and compaction in certain areas of the Property will need to include additional measures or precautions. Such areas include the placement of materials into areas below the water table, and the backfill requirements related to the installation and/or restoration of below-grade utilities.

To the extent possible, restoration activities will result in conditions that are the same or better than those present prior to the Removal Action. For example, existing surface elevations and surface topography will be replicated, and areas previously occupied by lawn, hedges, pavement, sidewalks, etc. will be restored in like kind. In addition, GE has discussed the scope of restoration activities and related post-removal conditions with City of Pittsfield officials, and has agreed to provide enhancements to the current facilities. It is anticipated that future enhancements will involve the construction of softball fields, a soccer field, other exercise areas within the perimeter of the Property, and the re-installation of playground equipment that is removed to facilitate the removal actions described in this Work Plan. Such enhancements are not a component of the Removal Action subject to USEPA approval and will therefore be developed in consultation with City officials.

### 4.6.2 Site Drainage Restoration

As noted previously in Section 2, prior to the development of the Property and construction of the school in 1950, this area was characterized as a relatively low-lying wetland. As a part of initial and subsequent development of the Property, various drainage enhancements were made to improve site drainage. The existing site plan included as Figure 3 illustrates these drainage enhancements facilities, as well as those constructed by GE as a part of the soil cover installation in 1991.

Below-grade site restoration activities will include the restoration of the pre-removal drainage system(s) as shown on the existing Site Plan. Additionally, certain further subgrade drainage enhancements will be added at the request of City officials to improve conditions in an area located to the east of the existing soil cover. Figure 15 illustrates those subgrade drainage lines that will be affected by the soil removal actions (and subject to replacement) as well as the new subgrade drainage lines to be constructed.

In addition to replacing and expanding the near-surface drainage system as described above, the current surface water runoff patterns in the eastern portion of the Property (near Virginia Avenue) will be further evaluated (this particular area of concern is located outside of the proposed soil removal limits). Currently, that area experiences drainage problems during wet periods, and City officials have requested that measures be taken to improve future conditions. In addition, the design of such measures will incorporate any changes to the surface topography that may result from the performance of other restoration activities, discussed above (e.g., the installation of new ballfields).

## 4.7 Project Documentation and Reporting

### 4.7.1 Daily Project Monitoring

Through a variety of mechanisms, response actions will be monitored on a continuous basis. Separate from any USEPA oversight, GE will implement a series of activities to ensure communication between GE and its contractors. Open lines of communication are necessary to monitor and document the progress of the response actions, and quickly and accurately respond to items requiring clarification. In addition to daily project meetings (both formal and informal), GE will utilize an on-site observer to gauge and document the contractor's activities and his general compliance with this Work Plan. Field notes, supplemented with periodic photographic documentation, will also be collected to document the project status. Other types of project monitoring will be in the form of project correspondence between GE, its contractors, USEPA and/or MDEP, and the use of survey equipment to confirm that the final removal limits are consistent with the remedial design.

### 4.7.2 Weekly Status Reports

During the Removal Action at the Property, GE will provide to USEPA, MDEP, the City, and other public officials a weekly written status report. Included in that report will be a summary of the work completed during the prior week, a description of the ongoing or pending work, and the identification of any outstanding issues.

### 4.7.3 Record Drawings

During construction, the contractor will be required to maintain one set of Record Drawings at the site, on which the contractor will show any scope of work changes. These drawings will be kept current on a day-to-day basis

in concert with the progress of the work. The following items are examples of some of the types of changes that could occur and must be recorded by the contractor:

- Changes in limits/extent of removal;
- Changes in materials, such as fill materials;
- Changes in topographical contours of finished grades;
- Additions to project activities;
- Elimination of a project component; and
- Unforeseen modifications made to existing underground utilities, fences, etc. made necessary by requirements of the work.

Upon completion of the project, the contractor will provide Record Drawings to GE for use in preparation of the Final Completion Report.

### 4.7.4 Project Modifications

In the event that the Removal Action cannot be implemented in accordance with the conditions identified in this Work Plan, or USEPA approval of the document, GE will prepare written documentation concerning the deviation, as well as the proposed measures (if any) needed to maintain compliance with the targeted removal action outcome. Any proposed modification will be submitted to USEPA for approval prior to its implementation.

### 4.7.5 Final Completion Report

Upon completion of the Removal Action, a Final Completion Report will be prepared, providing a description of the removal activities, including the results of post-excavation sampling, quantities of soil removed, disposition locations, and documentation of any removal action modifications (if applicable). The Final Completion Report

will provide record drawings depicting post-removal site conditions. Record Drawings will be based on physical measurements and/or survey measurements obtained by GE and its contractor.

In addition, the Final Completion Report will include an assessment of soil data collected prior to and during the Removal Action. This data validation effort (which is currently underway and will continue to be performed concurrent with the performance of the Removal Action) will be conducted in accordance with GE's current SAP/DCAQAP. In consideration of the post-Removal Action status of the Property, only those sampling data representative of soils remaining within the Property following the completion of site activities will be addressed. A summary of the data validation will be provided in the final report.

## 4.8 Post-Restoration Monitoring

Approximately one month after completion of the soil removal, backfilling, and final restoration activities, the restored surface will be inspected to identify potential problems associated with the restoration activities, such as settlement, stressed vegetation, and poor drainage issues. During the two-year period following the planting and installation of vegetative material, the Property will be inspected during April and October to ensure that the vegetation is growing as anticipated and is providing the necessary erosion control and the restored/enhanced drainage system(s) are functioning properly. Additional planting will be undertaken as needed to replace dead or dying vegetation or to fill in any gaps resulting from less than adequate growth, and drainage modifications will be performed as necessary to correct any issues resulting from work performed at the Property. GE will submit reports of such inspection and maintenance activities to USEPA and MDEP.

# 5. Anticipated Project Schedule

As indicated in Section 1.1, given the time available for performance of the Removal Action at the Property, USEPA review and approval of this Work Plan and GE's initiation of on-site activities must be performed in an expedited manner. Concurrent with USEPA review of this Work Plan, GE will solicit proposals for the performance of the Removal Action. Subsequently, on-site soil removal activities will begin following USEPA approval of this Work Plan and lodging of the Consent Decree in federal court.

At this time, it is estimated that the Contractor will need to be mobilized and begin removal in early July 1999. Upon commencing soil removal activities, site operations will likely be conducted during available daylight hours, six days per week (Monday through Saturday). It is estimated that the removal activities will take approximately two months to complete. A detailed project schedule is presented as Figure 16. This figure identifies the various activities and corresponding timeframes for implementing and completing the anticipated components of the removal actions. However, it should be noted that delays in USEPA approval, lodging of the Consent Decree, selection of a contractor(s), obtaining construction materials, adverse weather conditions, or unexpected site conditions could impact the actual completion dates.

# *Tables*

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| SS-01 | 01/30/90 | 0 | 0.5 | ND(0.26) |
| SS-02 | 01/30/90 | 0 | 0.5 | ND(0.25) |
| SS-03/SS-04 | 01/30/90 | 0 | 0.5 | ND(0.20) |
| | | 0.5 | 0.8 | ND(0.191) [ND(0.181)] |
| SS-05 | 01/30/90 | 0 | 0.4 | ND(0.20) |
| SS-07 | 01/30/90 | 0 | 0.5 | ND(0.22) [ND(0.20)] |
| SS-08 | 01/30/90 | 0 | 0.5 | ND(0.20) |
| SS-09/SS10 | 01/30/90 | 0 | 0.5 | ND(0.25) |
| | | 0.5 | 0.8 | ND(0.23) |
| SS-11/SS-12 | 01/30/90 | 0 | 0.5 | ND(0.20) |
| | | 0.5 | 0.8 | ND(0.20) |
| SS-13 | 01/30/90 | 0 | 0.5 | ND(0.21) |
| SS-14 | 01/30/90 | 0 | 0.5 | ND(0.21) |
| SS-15 | 01/30/90 | 0 | 0.5 | ND(0.20) |
| SS-16 | 01/30/90 | 0 | 0.5 | ND(0.28) |
| SS-17 | 01/30/90 | 0 | 0.5 | ND(0.31) |
| SS-18 | 01/30/90 | 0 | 0.5 | ND(0.27) |
| SS-19 | 01/30/90 | 0 | 0.5 | ND(0.26) |
| SS-20 | 01/30/90 | 0 | 0.5 | ND(0.31) |
| SS-21 | 01/30/90 | 0 | 0.5 | ND(0.20) |
| SS-22 | 01/30/90 | 0 | 0.5 | 2.4 |
| SS-24 | 01/30/90 | 0 | 0.5 | 0.69 |
| SS-25 | 01/30/90 | 0 | 0.5 | 0.38 |
| SS-26 | 01/30/90 | 0 | 0.5 | ND(0.23) |
| SD-01 | 01/30/90 | 0 | 0.5 | ND(0.24) [ND(0.24)] |
| SD-02 | 01/30/90 | 0 | 0.5 | 11 |
| SD-03 | 01/30/90 | 0 | 0.5 | 1.8 |
| AS1 | 04/25/90 | 0 | 0.25 | 1.22 |
| | | 0.25 | 0.5 | 0.6 |
| AS2 | 04/25/90 | 0 | 0.25 | 1.37 |
| | | 0.25 | 0.5 | 4.24 |
| AS3 | 04/25/90 | 0 | 0.25 | 2.95 |
| | | 0.25 | 0.5 | 1.33 |
| AS4 | 04/25/90 | 0 | 0.25 | 0.13 |
| | | 0.25 | 0.5 | 0.35 |
| AS5 | 04/25/90 | 0 | 0.25 | 0.15 |
| | | 0.25 | 0.5 | 0.9 |
| AS6 | 04/25/90 | 0 | 0.25 | 0.12 |
| | | 0.25 | 0.5 | 0.11 |
| AS7 | 04/25/90 | 0 | 0.25 | 1.11 |
| | | 0.25 | 0.5 | 1.14 |
| AS8 | 04/25/90 | 0 | 0.25 | 1.42 |
| | | 0.25 | 0.5 | 1.54 |
| AS9 | 04/25/90 | 0 | 0.25 | 0.23 |
| | | 0.25 | 0.5 | 0.39 |
| AS10 | 04/25/90 | 0 | 0.25 | 0.29 |
| | | 0.25 | 0.5 | 0.29 |
| VA3-1 | 04/25/90 | 0 | 0.25 | ND(0.05) |
| VA3-2 | 04/25/90 | 0 | 0.25 | ND(0.05) |
| VA7-1 | 04/25/90 | 0 | 0.25 | ND(0.05) |
| VA7-2 | 04/25/90 | 0 | 0.25 | 0.06 |
| VA11-1 | 04/25/90 | 0 | 0.25 | 0.05 |
| VA11-2 | 04/25/90 | 0 | 0.25 | 0.11 |
| VA15-1 | 04/25/90 | 0 | 0.25 | 0.10 |
| VA15-2 | 04/25/90 | 0 | 0.25 | 0.08 |
| VA19-1 | 04/25/90 | 0 | 0.25 | 0.10 |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| VA19-2 | 04/25/90 | 0 | 0.25 | 0.12 |
| VA23-1 | 04/25/90 | 0 | 0.25 | 0.19 |
| VA23-2 | 04/25/90 | 0 | 0.25 | 0.20 |
| VA31-1 | 04/25/90 | 0 | 0.25 | 0.05 |
| VA31-2 | 04/25/90 | 0 | 0.25 | 0.09 |
| K1 | 07/23/90 | 0 | 0.25 | 1.2 |
| | | 0.25 | 0.5 | 0.78 |
| | | 0.5 | 1 | 1.1 |
| | | 1 | 1.5 | 0.60 |
| K2 | 07/23/90 | 0 | 0.25 | 25 |
| | | 0.25 | 0.5 | 250 |
| | | 0.5 | 1 | 45 |
| | | 1 | 1.5 | 50 |
| K3 | 07/23/90 | 0 | 0.25 | 1.8 |
| | | 0.25 | 0.5 | 1.5 |
| | | 0.5 | 1 | 1.4 |
| | | 1 | 1.5 | 3.8 |
| K4 | 07/23/90 | 0 | 0.25 | 2.1 |
| | | 0.25 | 0.5 | 0.55 |
| | | 0.5 | 1 | 7.3 |
| | | 1 | 1.5 | 15 |
| K5 | 07/23/90 | 0 | 0.25 | 2.2 |
| | | 0.25 | 0.5 | 0.80 |
| | | 0.5 | 1 | 2.9 |
| | | 1 | 1.5 | 13 |
| K6 | 07/23/90 | 0 | 0.25 | 12 |
| | | 0.25 | 0.5 | 23 |
| | | 0.5 | 1 | 1.3 |
| | | 1 | 1.5 | 8.9 |
| K7 | 07/23/90 | 0 | 0.25 | 1.3 |
| | | 0.25 | 0.5 | 0.78 |
| | | 0.5 | 1 | 0.56 |
| | | 1 | 1.5 | 2.5 |
| K8 | 07/23/90 | 0 | 0.25 | 8.8 |
| | | 0.25 | 0.5 | 13 |
| | | 0.5 | 1 | 10 |
| | | 1 | 1.5 | 18 |
| K9 | 07/23/90 | 0 | 0.25 | 4.8 |
| | | 0.25 | 0.5 | 3.2 |
| | | 0.5 | 1 | 2.8 |
| | | 1 | 1.5 | 1.3 |
| K10 | 07/23/90 | 0 | 0.25 | 1.1 |
| | | 0.25 | 0.5 | 0.99 |
| | | 0.5 | 1 | 1.3 |
| | | 1 | 1.5 | 2.3 |
| K11 | 07/23/90 | 0 | 0.25 | 0.44 |
| | | 0.25 | 0.5 | 0.72 |
| | | 0.5 | 1 | 0.51 |
| | | 1 | 1.5 | 0.56 |
| K12 | 07/23/90 | 0 | 0.25 | 0.26 |
| | | 0.25 | 0.5 | 0.07 |
| | | 0.5 | 1 | 0.65 |
| | | 1 | 1.5 | 0.69 |
| K13 | 07/23/90 | 0 | 0.25 | 0.40 |
| | | 0.25 | 0.5 | 0.15 |
| | | 0.5 | 1 | 0.17 |
| | | 1 | 1.5 | 0.12 |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| K14 | 07/23/90 | 0 | 0.25 | 0.35 |
| | | 0.25 | 0.5 | 0.29 |
| | | 0.5 | 1 | 0.53 |
| | | 1 | 1.5 | 0.78 |
| K15 | 07/23/90 | 0 | 0.25 | 0.52 |
| | | 0.25 | 0.5 | 0.11 |
| | | 0.5 | 1 | 0.25 |
| | | 1 | 1.5 | 0.26 |
| K16 | 07/23/90 | 0 | 1.5 | ND(0.8) |
| K17 | 07/23/90 | 0 | 1.5 | 3.6 |
| K18 | 07/23/90 | 0 | 1.5 | 0.98 |
| K19 | 07/23/90 | 0 | 1.5 | 4.5 |
| K20 | 07/23/90 | 0 | 1.5 | 1.7 |
| K21 | 07/23/90 | 0 | 0.25 | 6.2 |
| | | 0.25 | 0.5 | 5.8 |
| | | 0.5 | 1 | 30 |
| | | 1 | 1.5 | 42 |
| K22 | 08/07/90 | 0 | 0.5 | 7.0 |
| | | 0.5 | 1 | 14 |
| K23 | 08/07/90 | 0 | 0.5 | ND(2.0) |
| | | 0.5 | 1 | ND(2.0) |
| K24 | 08/07/90 | 0 | 0.5 | 3.0 |
| | | 0.5 | 1 | 3.4 |
| K25 | 08/07/90 | 0 | 0.5 | ND(2.0) |
| | | 0.5 | 1 | ND(2.0) |
| K26 | 08/07/90 | 0 | 0.5 | 2.6 |
| | | 0.5 | 1 | 2.0 |
| K27 | 08/07/90 | 0 | 0.5 | 2.4 |
| | | 0.5 | 1 | 39 |
| K28 | 08/07/90 | 0 | 0.5 | 3.5 |
| | | 0.5 | 1 | 15 |
| K29 | 08/07/90 | 0 | 0.5 | 16 |
| | | 0.5 | 1 | 22 |
| K30 | 08/07/90 | 0 | 0.5 | ND(2.0) |
| | | 0.5 | 1 | 7.7 |
| B1 | 08/17/90 | 0 | 0.5 | 5.7 |
| | | 0.5 | 1 | 26 |
| | | 1 | 1.5 | 7.9 |
| | | 1.5 | 2 | 3.9 |
| | | 2 | 2.5 | 10 |
| | | 2.5 | 3 | 45 |
| | | 3 | 3.5 | 103 |
| | | 3.5 | 4 | 54 |
| | | 4 | 4.5 | 37 |
| | | 4.5 | 5 | 76 |
| | | 5 | 5.5 | 98 |
| | | 5.5 | 6 | ND(1.0) |
| B2 | 08/17/90 | 0 | 0.5 | 2.8 |
| | | 0.5 | 1 | 1.9 |
| | | 1 | 1.5 | 4.6 |
| | | 1.5 | 2 | 3.5 |
| | | 2 | 2.5 | 310 |
| | | 2.5 | 3 | 330 |
| | | 3 | 3.5 | 69 |
| | | 3.5 | 4 | 24 |
| B3 | 08/17/90 | 0 | 0.5 | 6.8 |
| | | 0.5 | 1 | 8.9 |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| B3 | 08/17/90 | 1 | 1.5 | 4.3 |
| | | 1.5 | 2 | 2.8 |
| | | 2 | 2.5 | ND(0.6) |
| | | 2.5 | 3 | ND(0.6) |
| | | 3.5 | 4 | ND(0.9) |
| B4 | 08/17/90 | 0 | 0.5 | 1.3 |
| | | 0.5 | 1 | 4.4 |
| | | 1 | 1.5 | 2.1 |
| | | 1.5 | 2 | 1.6 |
| | | 2 | 2.5 | 7.7 |
| | | 3.5 | 4 | 1.4 |
| | | 4 | 4.5 | ND(0.6) |
| B5 | 08/17/90 | 0 | 0.5 | 1.9 |
| | | 0.5 | 1 | 2.7 |
| | | 1 | 1.5 | 1.2 |
| | | 1.5 | 2 | ND(1.0) |
| | | 2 | 2.5 | ND(1.0) |
| | | 2.5 | 3 | ND(1.0) |
| B6 | 08/17/90 | 0 | 0.5 | ND(0.7) |
| | | 0.5 | 1 | ND(0.6) |
| | | 1 | 1.5 | ND(0.6) |
| | | 1.5 | 2 | ND(0.6) |
| | | 2 | 2.5 | ND(0.6) |
| | | 2.5 | 3 | ND(0.6) |
| | | 3 | 3.5 | ND(0.6) |
| | | 3.5 | 4 | ND(0.6) |
| | | 4 | 4.5 | ND(0.6) |
| B7 | 08/17/90 | 0 | 0.5 | 1.9 |
| | | 0.5 | 1 | 0.60 |
| | | 1 | 1.5 | 10 |
| | | 1.5 | 2 | 21 |
| | | 2 | 2.5 | 27 |
| | | 2.5 | 3 | 62 |
| | | 3 | 3.5 | 17 |
| | | 3.5 | 4 | 98 |
| B8 | 08/17/90 | 0 | 0.5 | 1.4 |
| | | 0.5 | 1 | 1.4 |
| | | 1 | 1.5 | 1.3 |
| | | 1.5 | 2 | 80 |
| | | 3 | 3.5 | 21 |
| | | 3.5 | 4 | 2.9 |
| B9 | 08/17/90 | 0 | 0.5 | 1.5 |
| | | 0.5 | 1 | 1.0 |
| | | 1 | 1.5 | 6.1 |
| | | 1.5 | 2 | 130 |
| | | 2 | 2.5 | 24 |
| | | 2.5 | 3 | 93 |
| | | 3 | 3.5 | 26 |
| | | 3.5 | 4 | 23 |
| B10 | 08/17/90 | 0 | 0.5 | 6.1 |
| | | 0.5 | 1 | 7.7 |
| | | 1 | 1.5 | 3.2 |
| | | 1.5 | 2 | 11 |
| | | 2 | 2.5 | 30 |
| | | 2.5 | 3 | 1.5 |
| | | 3 | 3.5 | 2.0 |
| | | 3.5 | 4 | ND(1.0) |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| B11 | 08/17/90 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 1 | ND(1.0) |
| | | 1 | 1.5 | ND(1.0) |
| | | 1.5 | 2 | ND(1.0) |
| | | 2 | 2.5 | ND(1.0) |
| | | 2.5 | 3 | ND(1.0) |
| B12 | 08/17/90 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 1 | ND(1.0) |
| | | 1 | 1.5 | ND(1.0) |
| | | 1.5 | 2 | ND(1.0) |
| | | 2 | 2.5 | ND(1.0) |
| | | 2.5 | 3 | ND(1.0) |
| B13 | 08/17/90 | 0 | 0.5 | ND(0.7) |
| B14 | 08/17/90 | 0 | 0.5 | 5.8 |
| | | 0.5 | 1 | 18 |
| | | 1 | 1.5 | 9.2 |
| | | 1.5 | 2 | 19 |
| | | 2 | 2.5 | 6.5 |
| | | 2.5 | 3 | 4.4 |
| | | 3 | 3.5 | 4.1 |
| | | 3.5 | 4 | 0.80 |
| B15 | 08/17/90 | 0 | 0.5 | ND(0.7) |
| | | 0.5 | 1 | 4.1 |
| | | 1 | 1.5 | 19 |
| | | 1.5 | 2 | 20 |
| B16 | 08/17/90 | 0 | 0.5 | 3.6 |
| | | 0.5 | 1 | 0.80 |
| | | 1 | 1.5 | 33 |
| | | 1.5 | 2 | 105 |
| | | 2 | 2.5 | 39 |
| | | 2.5 | 3 | 49 |
| | | 3 | 3.5 | 106 |
| | | 3.5 | 4 | 93 |
| | | 4 | 4.5 | 43 |
| | | 4.5 | 5 | 3.6 |
| B17 | 08/17/90 | 0 | 0.5 | 2.3 |
| | | 0.5 | 1 | 1.0 |
| | | 1 | 1.5 | 70 |
| | | 1.5 | 2 | 62 |
| | | 2 | 2.5 | 35 |
| | | 2.5 | 3 | 47 |
| | | 3 | 3.5 | 30 |
| | | 3.5 | 4 | 20 |
| B18 | 08/17/90 | 0 | 0.5 | 3.6 |
| | | 0.5 | 1 | 9.0 |
| | | 1 | 1.5 | 97 |
| | | 1.5 | 2 | 1100 |
| | | 2 | 2.5 | 34 |
| | | 2.5 | 3 | 68 |
| | | 3 | 3.5 | 3.7 |
| | | 3.5 | 4 | ND(0.8) |
| B20 | 08/17/90 | 0 | 0.5 | ND(0.7) |
| | | 0.5 | 1 | 1.0 |
| | | 1 | 1.5 | 8.6 |
| | | 1.5 | 2 | 18 |
| | | 2 | 2.5 | 36 |
| | | 2.5 | 3 | 8.7 |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| B20 | 08/17/90 | 3 | 3.5 | 14 |
| | | 3.5 | 4 | 12 |
| | | 4 | 4.5 | 2.6 |
| B28 | 08/23/90 | 0 | 0.5 | 0.6 |
| | | 0.5 | 1 | 6.8 |
| B29 | 08/23/90 | 0 | 0.5 | ND(0.7) |
| | | 0.5 | 1 | ND(0.7) |
| B39 | 08/23/90 | 0 | 0.5 | ND(0.6) |
| | | 0.5 | 1 | ND(0.6) |
| B43 | 08/23/90 | 0 | 0.5 | ND(0.7) |
| | | 0.5 | 1 | ND(0.7) |
| B44 | 08/23/90 | 0 | 0.5 | ND(0.7) |
| | | 0.5 | 1 | ND(0.6) |
| B48 | 08/23/90 | 0 | 0.5 | ND(0.6) |
| | | 0.5 | 1 | 4.1 |
| B50 | 08/23/90 | 0 | 0.5 | ND(0.8) |
| | | 0.5 | 1 | ND(0.6) |
| | | 1 | 1.5 | ND(0.6) |
| | | 1.5 | 2 | 1.9 |
| | | 2 | 2.5 | ND(0.6) |
| | | 2.5 | 3 | ND(0.6) |
| | | 3 | 3.5 | ND(0.6) |
| | | 3.5 | 4 | ND(0.6) |
| | | 4 | 4.5 | ND(0.6) |
| | | 4.5 | 5 | ND(0.6) |
| | | 5 | 5.5 | ND(0.6) |
| | | 5.5 | 6 | ND(0.6) |
| B52 | 08/23/90 | 0 | 0.5 | ND(0.7) |
| | | 0.5 | 1 | 1.2 |
| B54 | 08/23/90 | 0 | 0.5 | ND(0.8) |
| | | 0.5 | 1 | ND(0.6) |
| B55 | 08/23/90 | 0 | 0.5 | ND(0.8) |
| | | 0.5 | 1 | ND(0.7) |
| | | 1 | 1.5 | ND(0.7) |
| | | 1.5 | 2 | ND(0.6) |
| | | 2 | 2.5 | ND(0.6) |
| | | 2.5 | 3 | ND(0.6) |
| | | 3 | 3.5 | ND(0.6) |
| | | 3.5 | 4 | ND(0.6) |
| B56 | 08/23/90 | 0 | 0.5 | ND(0.6) |
| | | 0.5 | 1 | ND(0.6) |
| | | 1 | 1.5 | ND(0.6) |
| | | 1.5 | 2 | ND(0.6) |
| | | 2 | 2.5 | ND(0.6) |
| | | 2.5 | 3 | ND(0.6) |
| | | 3 | 3.5 | ND(0.6) |
| | | 3.5 | 4 | ND(0.6) |
| B57 | 08/23/90 | 0 | 0.5 | 1.8 |
| | | 0.5 | 1 | 11 |
| B58 | 08/23/90 | 0 | 0.5 | ND(0.7) |
| | | 0.5 | 1 | ND(0.6) |
| B59 | 08/23/90 | 0 | 0.5 | ND(0.8) |
| | | 0.5 | 1 | ND(0.7) |
| B60 | 08/24/90 | 0 | 0.5 | ND(0.9) |
| B60 | | 0.5 | 1 | ND(0.7) |
| B61 | 08/24/90 | 0 | 0.5 | ND(0.8) |
| | | 0.5 | 1 | ND(0.7) |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| B61 | 08/24/90 | 1 | 1.5 | ND(0.7) |
| | | 1.5 | 2 | ND(0.7) |
| | | 2 | 2.5 | ND(0.6) |
| | | 2.5 | 3 | ND(0.6) |
| | | 3 | 3.5 | ND(0.6) |
| | | 3.5 | 4 | ND(0.6) |
| B62 | 08/24/90 | 0 | 0.5 | ND(0.7) |
| | | 0.5 | 1 | ND(0.6) |
| | | 1 | 1.5 | ND(0.6) |
| | | 1.5 | 2 | ND(0.6) |
| | | 2 | 2.5 | ND(0.6) |
| | | 2.5 | 3 | ND(0.6) |
| | | 3 | 3.5 | ND(0.6) |
| | | 3.5 | 4 | ND(0.6) |
| B63 | 08/24/90 | 0 | 0.5 | ND(0.7) |
| | | 0.5 | 1 | ND(0.6) |
| | | 1 | 1.5 | ND(0.6) |
| | | 1.5 | 2 | ND(0.6) |
| | | 2 | 2.5 | ND(0.6) |
| | | 2.5 | 3 | ND(0.6) |
| | | 3 | 3.5 | ND(0.6) |
| | | 3.5 | 4 | ND(0.6) |
| B64 | 08/27/90 | 0 | 0.5 | ND(0.7) |
| | | 0.5 | 1 | ND(0.6) |
| B65 | 08/27/90 | 0 | 0.5 | ND(0.6) |
| | | 0.5 | 1 | ND(0.6) |
| | | 1 | 1.5 | ND(0.6) |
| | | 1.5 | 2 | ND(0.5) |
| | | 2 | 2.5 | ND(0.96) |
| | | 2.5 | 3 | ND(0.6) |
| | | 3 | 3.5 | ND(0.6) |
| | | 3.5 | 4 | ND(0.6) |
| | | 4 | 4.5 | ND(0.6) |
| | | 4.5 | 5 | ND(0.6) |
| | | 5 | 5.5 | ND(0.7) |
| | | 5.5 | 6 | ND(0.7) |
| B66 | 08/27/90 | 0 | 0.5 | ND(0.6) |
| | | 0.5 | 1 | ND(0.6) |
| | | 1 | 1.5 | ND(0.6) |
| | | 1.5 | 2 | ND(0.6) |
| | | 2 | 2.5 | ND(0.6) |
| | | 2.5 | 3 | ND(0.6) |
| | | 3 | 3.5 | ND(0.6) |
| | | 3.5 | 4 | ND(0.6) |
| | | 4 | 4.5 | ND(0.6) |
| | | 4.5 | 5 | ND(0.6) |
| | | 5 | 5.5 | ND(0.6) |
| | | 5.5 | 6 | ND(0.6) |
| | | 6 | 6.5 | 1.3 |
| | | 6.5 | 7 | ND(0.6) |
| | | 7 | 7.5 | 1.2 |
| | | 7.5 | 8 | 1.1 |
| | | 8 | 8.5 | ND(0.6) |
| | | 8.5 | 9 | ND(0.6) |
| | | 9 | 9.5 | 1.0 |
| | | 9.5 | 10 | 0.80 |
| | | 10 | 10.5 | ND(0.6) |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| B66 | 08/27/90 | 10.5 | 11 | 4.1 |
| | | 11 | 11.5 | 2.2 |
| | | 11.5 | 12 | ND(0.6) |
| B67 | 08/27/90 | 0 | 0.5 | ND(0.6) |
| | | 0.5 | 1 | ND(0.6) |
| | | 1 | 1.5 | ND(0.6) |
| | | 1.5 | 2 | ND(0.6) |
| | | 2 | 2.5 | ND(0.6) |
| | | 2.5 | 3 | ND(0.6) |
| | | 3 | 3.5 | ND(0.6) |
| | | 3.5 | 4 | ND(0.6) |
| | | 4 | 4.5 | ND(0.6) |
| | | 4.5 | 5 | ND(0.6) |
| | | 5 | 5.5 | ND(0.6) |
| | | 5.5 | 6 | 4.0 |
| | | 6 | 6.5 | ND(0.6) |
| | | 6.5 | 7 | 11 |
| | | 7 | 7.5 | 3.0 |
| | | 7.5 | 8 | 1.5 |
| | | 8 | 8.5 | ND(0.6) |
| | | 8.5 | 9 | ND(0.6) |
| | | 9 | 9.5 | ND(0.6) |
| | | 9.5 | 10 | ND(0.7) |
| B68 | 08/27/90 | 0 | 0.5 | ND(0.6) |
| | | 0.5 | 1 | ND(0.6) |
| | | 1 | 1.5 | ND(0.6) |
| | | 1.5 | 2 | ND(0.6) |
| | | 2 | 2.5 | ND(0.6) |
| | | 2.5 | 3 | ND(0.6) |
| | | 3 | 3.5 | ND(0.6) |
| | | 3.5 | 4 | ND(0.6) |
| | | 4 | 4.5 | ND(0.6) |
| | | 4.5 | 5 | ND(0.6) |
| | | 5 | 5.5 | ND(0.6) |
| | | 5.5 | 6 | ND(0.7) |
| T-1 | Feb 1991 | 0 | 1 | 0.019 |
| | | 1 | 2 | 0.019 |
| | | 2 | 3 | ND(0.011) |
| | | 3 | 4 | ND(0.011) |
| T-2 | Feb 1991 | 0 | 1 | 0.050 |
| | | 1 | 2 | ND(0.013) |
| | | 2 | 3 | ND(0.011) |
| | | 3 | 4 | ND(0.011) |
| T-3 | Feb 1991 | 0 | 1 | ND(0.014) |
| | | 1 | 2 | ND(0.012) |
| | | 2 | 3 | ND(0.012) |
| | | 3 | 4 | ND(0.012) |
| T-4 | Feb 1991 | 0 | 1 | 0.037 |
| | | 1 | 2 | ND(0.011) |
| | | 2 | 3 | ND(0.012) |
| | | 3 | 4 | ND(0.01) |
| T-5 | Feb 1991 | 0 | 1 | 0.015 |
| | | 1 | 2 | ND(0.01) |
| | | 2 | 3 | ND(0.011) |
| | | 3 | 4 | ND(0.01) |
| T-6 | Feb 1991 | 0 | 1 | 0.018 |
| | | 1 | 2 | ND(0.013) |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| T-6 | Feb 1991 | 2 | 3 | 0.020 |
| | | 3 | 4 | ND(0.01) |
| T-7 | Feb 1991 | 1 | 2 | 0.021 |
| | | 2 | 3 | ND(0.012) |
| | | 3 | 4 | ND(0.015) |
| T-8 | Feb 1991 | 0 | 1 | 0.022 |
| | | 1 | 2 | ND(0.012) |
| | | 2 | 3 | ND(0.011) |
| | | 3 | 4 | ND(0.011) |
| T-9 | Feb 1991 | 0 | 1 | 0.095 |
| | | 1 | 2 | 0.027 |
| | | 2 | 3 | ND(0.01) |
| | | 3 | 4 | ND(0.01) |
| T-10 | Feb 1991 | 0 | 1 | 0.104 |
| | | 1 | 2 | 0.012 |
| | | 2 | 3 | ND(0.01) |
| | | 3 | 4 | ND(0.01) |
| T-11 | Feb 1991 | 0 | 1 | 0.012 |
| | | 1 | 2 | 0.097 |
| | | 2 | 3 | ND(0.01) |
| | | 3 | 4 | ND(0.011) |
| T-12 | Feb 1991 | 0 | 1 | 0.022 |
| | | 1 | 2 | ND(0.01) |
| | | 2 | 3 | ND(0.01) |
| | | 3 | 4 | ND(0.009) |
| T-13 | Feb 1991 | 0 | 1 | 0.027 |
| | | 1 | 2 | ND(0.01) |
| | | 2 | 3 | ND(0.009) |
| | | 3 | 4 | ND(0.01) |
| T-14 | Feb 1991 | 0 | 1 | 0.016 |
| | | 1 | 2 | ND(0.011) |
| | | 2 | 3 | ND(0.009) |
| | | 3 | 4 | ND(0.009) |
| T-15 | Feb 1991 | 0 | 1 | ND(0.012) |
| | | 1 | 2 | ND(0.01) |
| | | 2 | 3 | ND(0.008) |
| | | 3 | 4 | ND(0.01) |
| T-16 | Feb 1991 | 0 | 1 | 0.016 |
| | | 1 | 2 | ND(0.009) |
| | | 2 | 3 | ND(0.086) |
| | | 3 | 4 | ND(0.011) |
| T-17 | Feb 1991 | 0 | 1 | ND(0.011) |
| | | 1 | 2 | 0.015 |
| | | 2 | 3 | ND(0.011) |
| | | 3 | 4 | ND(0.01) |
| T-18 | Feb 1991 | 0 | 1 | 0.025 |
| | | 1 | 2 | ND(0.01) |
| | | 2 | 3 | ND(0.01) |
| | | 3 | 4 | ND(0.01) |
| T-19 | Feb 1991 | 0 | 1 | ND(0.01) |
| | | 1 | 2 | ND(0.01) |
| | | 2 | 3 | ND(0.01) |
| | | 3 | 4 | ND(0.01) |
| T-20 | Feb 1991 | 0 | 1 | 0.014 |
| | | 1 | 2 | ND(0.01) |
| | | 2 | 3 | ND(0.01) |
| | | 3 | 4 | ND(0.009) |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| T-21 | Feb 1991 | 0 | 1 | 0.025 |
| | | 1 | 2 | ND(0.01) |
| | | 2 | 3 | ND(0.01) |
| | | 3 | 4 | ND(0.009) |
| T-22 | Feb 1991 | 0 | 1 | 0.085 |
| | | 1 | 2 | 0.018 |
| | | 2 | 3 | 0.014 |
| | | 3 | 4 | ND(0.01) |
| T-23 | Feb 1991 | 0 | 1 | 0.017 |
| | | 1 | 2 | 0.010 |
| | | 2 | 3 | ND(0.012) |
| | | 3 | 4 | ND(0.009) |
| T-24 | Feb 1991 | 0 | 1 | 0.015 |
| | | 1 | 2 | ND(0.009) |
| | | 2 | 3 | ND(0.009) |
| | | 3 | 4 | ND(0.009) |
| T-25 | Feb 1991 | 0 | 1 | 0.042 |
| | | 1 | 2 | 0.050 |
| | | 2 | 3 | ND(0.01) |
| | | 3 | 4 | ND(0.01) |
| T-26 | Feb 1991 | 0 | 1 | 0.37 |
| | | 1 | 2 | 0.78 |
| | | 2 | 3 | 0.024 |
| | | 3 | 4 | ND(0.096) |
| T-27 | Feb 1991 | 0 | 1 | 0.42 |
| | | 1 | 2 | 0.13 |
| | | 2 | 3 | 0.14 |
| | | 3 | 4 | 0.016 |
| T-28 | Feb 1991 | 0 | 1 | 0.32 |
| | | 1 | 2 | ND(0.115) |
| | | 2 | 3 | ND(0.12) |
| | | 3 | 4 | ND(0.12) |
| T-29 | Feb 1991 | 0 | 1 | 1.2 |
| | | 1 | 2 | 0.114 |
| | | 2 | 3 | ND(0.11) |
| | | 3 | 4 | ND(0.12) |
| T-30 | Feb 1991 | 0 | 1 | 0.29 |
| | | 1 | 2 | 1.59 |
| | | 2 | 3 | ND(0.011) |
| | | 3 | 4 | ND(0.013) |
| B-20-96 | Aug 1996 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 2 | ND(1.0) |
| | | 2 | 4 | ND(1.0) |
| | | 4 | 6 | ND(1.0) |
| | | 6 | 8 | ND(1.0) |
| | | 8 | 10 | 5.42 |
| | | 10 | 12 | ND(1.0) |
| B-21-96 | Aug 1996 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 2 | ND(1.0) |
| | | 2 | 4 | ND(1.0) |
| | | 4 | 6 | 10.6 |
| | | 6 | 8 | ND(1.0) |
| | | 8 | 10 | ND(1.0) |
| B-22-96 | Aug 1996 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 2 | ND(1.0) |
| | | 2 | 4 | 24.4 |
| | | 4 | 6 | 2.73 |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| B-23-96 | Aug 1996 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 2 | ND(1.0) |
| | | 2 | 4 | ND(1.0) |
| | | 4 | 6 | ND(1.0) |
| B-24-96 | Aug 1996 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 2 | ND(1.0) |
| | | 2 | 4 | ND(1.0) |
| | | 4 | 6 | ND(1.0) |
| B-25-96 | Aug 1996 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 2 | ND(1.0) |
| | | 2 | 4 | ND(1.0) |
| | | 4 | 6 | ND(1.0) |
| B-26-96 | Aug 1996 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 2 | ND(1.0) |
| | | 2 | 4 | ND(1.0) |
| | | 4 | 6 | ND(1.0) |
| B-27-96 | Aug 1996 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 2 | ND(1.0) |
| | | 2 | 4 | ND(1.0) |
| | | 4 | 6 | ND(1.0) |
| B-28-96 | Aug 1996 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 2 | ND(1.0) |
| | | 2 | 4 | ND(1.0) |
| | | 4 | 6 | ND(1.0) |
| B-29-96 | Aug 1996 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 2 | ND(1.0) |
| | | 2 | 4 | ND(1.0) |
| B-30-96 | Aug 1996 | 0 | 0.5 | ND(1.0) |
| | | 0.5 | 2 | ND(1.0) |
| | | 2 | 4 | ND(1.0) |
| | | 4 | 6 | ND(1.0) |
| B-31-96 | Aug 1996 | 4 | 6 | ND(1.0) |
| | | 6 | 8 | ND(1.0) |
| B-32-96 | Aug 1996 | 4 | 6 | ND(1.0) |
| | | 6 | 8 | ND(1.0) |
| AS-96-1 | Oct 1996 | 0 | 0.5 | 0.056 |
| | | 0.5 | 1 | 0.14 |
| AS-96-2 | Oct 1996 | 0 | 0.5 | 0.077 |
| | | 0.5 | 1 | ND(0.039) |
| AS-96-3 | Oct 1996 | 0 | 0.5 | 0.093 |
| | | 0.5 | 1 | 0.088 |
| AS-96-4 | Oct 1996 | 0 | 0.5 | 0.053 |
| | | 0.5 | 1 | 0.097 |
| AS-96-5 | Oct 1996 | 0 | 0.5 | 0.052 |
| | | 0.5 | 1 | ND(0.039) |
| AS-96-6 | Oct 1996 | 0 | 0.5 | 0.067 |
| | | 0.5 | 1 | ND(0.039) |
| AS-96-7 | Oct 1996 | 0 | 0.5 | 0.069 |
| | | 0.5 | 1 | ND(0.04) |
| AS-96-8 | Oct 1996 | 0 | 0.5 | 0.060 |
| | | 0.5 | 1 | 0.065 |
| AS-96-9 | Oct 1996 | 0 | 0.5 | 0.060 |
| | | 0.5 | 1 | 0.22 |
| AS-96-10 | Oct 1996 | 0 | 0.5 | 0.17 |
| | | 0.5 | 1 | 0.056 |
| AS-96-11 | Oct 1996 | 0 | 0.5 | 0.052 |
| | | 0.5 | 1 | ND(0.041) |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| AS-96-12 | Oct 1996 | 0 | 0.5 | ND(0.039) |
| | | 0.5 | 1 | ND(0.038) |
| AS-96-13 | Oct 1996 | 0 | 0.5 | 0.080 |
| | | 0.5 | 1 | ND(0.041) |
| AS-96-14 | Oct 1996 | 0 | 0.5 | 0.27 |
| | | 0.5 | 1 | 0.13 |
| AS-96-15 | Oct 1996 | 0 | 0.5 | 0.094 |
| | | 0.5 | 1 | 0.073 |
| AS-96-16 | Oct 1996 | 0 | 0.5 | 0.071 |
| | | 0.5 | 1 | 0.075 |
| AS-96-17 | Oct 1996 | 0 | 0.5 | 0.33 |
| | | 0.5 | 1 | 0.10 |
| AS-96-18 | Oct 1996 | 0 | 0.5 | 0.18 |
| | | 0.5 | 1 | 0.073 |
| AS-96-19 | Oct 1996 | 0 | 0.5 | 0.088 |
| | | 0.5 | 1 | 0.073 |
| AS-96-20 | Oct 1996 | 0 | 0.5 | 0.044 |
| | | 0.5 | 1 | ND(0.037) |
| AS-96-21 | Oct 1996 | 0 | 0.5 | 0.058 |
| | | 0.5 | 1 | ND(0.037) |
| AS-96-22 | Oct 1996 | 0 | 0.5 | 0.071 |
| | | 0.5 | 1 | ND(0.036) |
| AS-96-23 | Oct 1996 | 0 | 0.5 | 0.070 |
| | | 0.5 | 1 | ND(0.036) |
| AS-96-24 | Oct 1996 | 0 | 0.5 | 0.051 |
| | | 0.5 | 1 | ND(0.036) |
| AS-96-25 | Oct 1996 | 0 | 0.5 | 0.11 |
| | | 0.5 | 1 | ND(0.035) |
| AS-96-26 | Oct 1996 | 0 | 0.5 | 0.11 |
| | | 0.5 | 1 | 0.051 |
| AS-96-27 | Oct 1996 | 0 | 0.5 | 0.13 |
| | | 0.5 | 1 | ND(0.036) |
| AS-96-28 | Oct 1996 | 0 | 0.5 | 0.072 |
| | | 0.5 | 1 | ND(0.036) |
| AS-96-29 | Oct 1996 | 0 | 0.5 | 0.11 |
| | | 0.5 | 1 | 0.045 |
| AS-96-30 | Oct 1996 | 0 | 0.5 | 0.060 |
| | | 0.5 | 1 | ND(0.039) |
| AS-96-31 | Oct 1996 | 0 | 0.5 | ND(0.036) |
| | | 0.5 | 1 | ND(0.04) |
| AS-96-32 | Oct 1996 | 0 | 0.5 | 0.049 |
| | | 0.5 | 1 | ND(0.038) |
| AS-96-33 | Oct 1996 | 0 | 0.5 | 0.057 |
| | | 0.5 | 1 | ND(0.033) |
| AS-96-34 | Oct 1996 | 0 | 0.5 | 0.096 |
| | | 0.5 | 1 | 0.17 |
| AS-96-35 | Oct 1996 | 0 | 0.5 | 0.066 |
| | | 0.5 | 1 | ND(0.038) |
| AS-96-36 | Oct 1996 | 0 | 0.5 | 0.10 |
| | | 0.5 | 1 | ND(0.043) |
| AS-96-37 | Oct 1996 | 0 | 0.5 | 0.075 |
| | | 0.5 | 1 | 0.069 |
| AS-96-38 | Oct 1996 | 0 | 0.5 | 0.19 |
| | | 0.5 | 1 | 0.065 |
| AS-96-39 | Oct 1996 | 0 | 0.5 | 0.063 |
| | | 0.5 | 1 | ND(0.038) |
| AS-96-40 | Oct 1996 | 0 | 0.5 | 0.054 |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| AS-96-40 | Oct 1996 | 0.5 | 1 | ND(0.039) |
| AS-96-41 | Oct 1996 | 0 | 0.5 | 0.13 |
| | | 0.5 | 1 | 0.12 |
| AS-96-42 | Oct 1996 | 0 | 0.5 | 0.057 |
| | | 0.5 | 1 | 0.071 |
| AS-96-43 | Oct 1996 | 0 | 0.5 | 0.080 |
| | | 0.5 | 1 | 0.061 |
| AS-96-44 | Oct 1996 | 0 | 0.5 | 0.046 |
| | | 0.5 | 1 | ND(0.036) |
| AS-96-45 | Oct 1996 | 0 | 0.5 | 0.16 |
| | | 0.5 | 1 | 0.083 |
| AS-96-46 | Oct 1996 | 0 | 0.5 | 0.084 |
| | | 0.5 | 1 | 0.063 |
| AS-96-47 | Oct 1996 | 0 | 0.5 | 0.084 |
| | | 0.5 | 1 | 0.055 |
| AS-96-48 | Oct 1996 | 0 | 0.5 | 0.070 |
| | | 0.5 | 1 | ND(0.039) |
| AS-96-49 | Oct 1996 | 0 | 0.5 | 0.085 |
| | | 0.5 | 1 | 0.046 |
| AS-96-50 | Oct 1996 | 0 | 0.5 | 0.13 |
| | | 0.5 | 1 | 0.91 |
| AS-96-51 | Oct 1996 | 0 | 0.5 | 0.12 |
| | | 0.5 | 1 | 0.089 |
| AS-96-52 | Oct 1996 | 0 | 0.5 | 0.051 |
| | | 0.5 | 1 | ND(0.036) |
| AS-96-53 | Oct 1996 | 0 | 0.5 | 0.10 |
| | | 0.5 | 1 | 0.042 |
| AS-96-54 | Oct 1996 | 0 | 0.5 | 0.074 |
| | | 0.5 | 1 | 0.056 |
| AS-96-55 | Oct 1996 | 0 | 0.5 | 0.05 |
| | | 0.5 | 1 | 0.051 |
| AS-96-56 | Oct 1996 | 0 | 0.5 | 0.066 |
| | | 0.5 | 1 | 0.071 |
| AS-96-57 | Oct 1996 | 0 | 0.5 | 0.092 |
| | | 0.5 | 1 | 0.065 |
| AS-96-58 | Oct 1996 | 0 | 0.5 | 0.11 |
| | | 0.5 | 1 | 0.044 |
| AS-96-59 | Oct 1996 | 0 | 0.5 | 0.094 |
| | | 0.5 | 1 | 0.11 |
| AS-96-60 | Oct 1996 | 0 | 0.5 | 0.086 |
| | | 0.5 | 1 | 0.11 |
| AS-96-61 | Oct 1996 | 0 | 0.5 | 0.059 |
| | | 0.5 | 1 | 0.046 |
| AS-96-62 | Oct 1996 | 0 | 0.5 | 0.14 |
| | | 0.5 | 1 | 0.066 |
| AS-96-63 | Oct 1996 | 0 | 0.5 | 0.41 |
| | | 0.5 | 1 | 0.62 |
| AS-96-64 | Oct 1996 | 0 | 0.5 | 0.23 |
| | | 0.5 | 1 | 0.89 |
| AS-96-65 | Oct 1996 | 0 | 0.5 | ND(0.039) |
| | | 0.5 | 1 | 0.10 |
| AS-96-66 | Oct 1996 | 0 | 0.5 | ND(0.039) |
| | | 0.5 | 1 | ND(0.039) |
| AS-96-67 | Oct 1996 | 0 | 0.5 | 0.10 |
| | | 0.5 | 1 | 0.059 |
| AS-96-68 | Oct 1996 | 0 | 0.5 | ND(0.040) |
| | | 0.5 | 1 | ND(0.038) |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| AS-96-69 | Oct 1996 | 0 | 0.5 | 0.14 |
| | | 0.5 | 1 | 0.052 |
| AS-96-70 | Oct 1996 | 0 | 0.5 | 0.46 |
| | | 0.5 | 1 | 0.52 |
| AS-96-71 | Oct 1996 | 0 | 0.5 | ND(0.034) |
| | | 0.5 | 1 | ND(0.035) |
| AS-96-72 | Oct 1996 | 0 | 0.5 | 0.18 |
| | | 0.5 | 1 | 0.14 |
| AS-96-73 | Oct 1996 | 0 | 0.5 | 0.077 |
| | | 0.5 | 1 | ND(0.041) |
| AS-96-74 | Oct 1996 | 0 | 0.5 | 0.51 |
| | | 0.5 | 1 | 0.41 |
| AS-96-75 | Oct 1996 | 0 | 0.5 | 1.0 |
| | | 0.5 | 1 | 1.5 |
| AS-96-76* | Oct 1996 | 0 | 0.5 | 2.8 |
| | | 0.5 | 1 | 2.7 |
| AS-96-77 | Oct 1996 | 0 | 0.5 | 0.11 |
| | | 0.5 | 1 | 0.060 |
| AS-96-78 | Oct 1996 | 0 | 0.5 | 0.085 |
| | | 0.5 | 1 | 0.040 |
| AS-96-79* | Oct 1996 | 0 | 0.5 | ND(0.038) |
| | | 0.5 | 1 | ND(0.038) |
| AS-96-80* | Oct 1996 | 0 | 0.5 | 3.6 |
| | | 0.5 | 1 | 16 |
| AS-96-81 | Oct 1996 | 0 | 0.5 | 1.7 |
| | | 0.5 | 1 | 0.88 |
| AS-96-82 | Oct 1996 | 0 | 0.5 | 0.067 |
| | | 0.5 | 1 | 0.11 |
| AS-96-83 | Oct 1996 | 0 | 0.5 | 0.094 |
| | | 0.5 | 1 | 0.043 |
| AS-96-84 | Oct 1996 | 0 | 0.5 | 0.20 |
| | | 0.5 | 1 | 0.21 |
| AS-96-85 | Oct 1996 | 0 | 0.5 | 0.13 |
| | | 0.5 | 1 | 0.64 |
| AS-96-86 | Oct 1996 | 0 | 0.5 | 0.18 |
| | | 0.5 | 1 | 0.12 |
| AS-96-87 | Oct 1996 | 0 | 0.5 | 0.40 |
| | | 0.5 | 1 | 0.047 |
| AS-96-88 | Oct 1996 | 0 | 0.5 | 0.22 |
| | | 0.5 | 1 | 0.93 |
| AS-96-89 | Oct 1996 | 0 | 0.5 | 0.41 |
| | | 0.5 | 1 | 0.29 |
| AS-96-90 | Oct 1996 | 0 | 0.5 | 0.25 |
| | | 0.5 | 1 | 0.27 |
| AS-96-91 | Oct 1996 | 0 | 0.5 | 0.22 |
| | | 0.5 | 1 | 0.16 |
| AS-96-92 | Oct 1996 | 0 | 0.5 | 0.34 |
| | | 0.5 | 1 | 0.47 |
| AS-96-93 | Oct 1996 | 0 | 0.5 | ND(0.041) |
| | | 0.5 | 1 | ND(0.039) |
| AS-96-94 | Oct 1996 | 0 | 0.5 | 0.37 |
| | | 0.5 | 1 | 0.13 |
| AS-96-95 | Oct 1996 | 0 | 0.5 | 0.23 |
| | | 0.5 | 1 | 0.12 |
| AS-96-96 | Oct 1996 | 0 | 0.5 | 0.27 |
| | | 0.5 | 1 | 0.61 |
| AS-96-97 | Oct 1996 | 0 | 0.5 | ND(0.040) |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| AS-96-97 | Oct 1996 | 0.5 | 1 | ND(0.039) |
| AS-96-98 | Oct 1996 | 0 | 0.5 | 0.72 |
| | | 0.5 | 1 | 0.22 |
| AS-96-99 | Oct 1996 | 0 | 0.5 | 0.13 |
| | | 0.5 | 1 | 0.053 |
| AS-96-100 | Oct 1996 | 0 | 0.5 | 0.22 |
| | | 0.5 | 1 | 0.61 |
| AS-96-101 | Oct 1996 | 0 | 0.5 | 0.18 |
| | | 0.5 | 1 | 0.14 |
| AS-96-102 | Oct 1996 | 0 | 0.5 | 0.48 |
| | | 0.5 | 1 | 0.54 |
| AS-96-103 | Oct 1996 | 0 | 0.5 | ND(0.042) |
| | | 0.5 | 1 | 0.13 |
| AS-96-104 | Oct 1996 | 0 | 0.5 | 0.12 |
| | | 0.5 | 1 | 0.96 |
| AS-96-105 | Oct 1996 | 0 | 0.5 | 0.23 |
| | | 0.5 | 1 | 0.45 |
| AS-96-106 | Oct 1996 | 0 | 0.5 | ND(0.041) |
| | | 0.5 | 1 | ND(0.041) |
| AS-96-107 | Oct 1996 | 0 | 0.5 | 0.061 |
| | | 0.5 | 1 | ND(0.040) |
| AS-96-108 | Oct 1996 | 0 | 0.5 | 0.37 |
| | | 0.5 | 1 | 0.074 |
| AS-96-109 | Oct 1996 | 0 | 0.5 | 0.14 |
| | | 0.5 | 1 | 0.092 |
| AS-96-110 | Oct 1996 | 0 | 0.5 | 0.98 |
| | | 0.5 | 1 | 0.24 |
| AS-96-111 | Oct 1996 | 0 | 0.5 | 0.098 |
| | | 0.5 | 1 | ND(0.036) |
| AS-96-112 | Oct 1996 | 0 | 0.5 | 0.096 |
| | | 0.5 | 1 | 0.068 |
| AS-96-113 | Oct 1996 | 0 | 0.5 | 0.085 |
| | | 0.5 | 1 | 0.058 |
| AS-96-114 | Oct 1996 | 0 | 0.5 | ND(0.037) |
| | | 0.5 | 1 | 0.12 |
| PRE-1 | Apr 1997 | 0 | 2 | ND(0.037) |
| | | 2 | 4 | 0.072 |
| PRE-2 | Apr 1997 | 0 | 2 | 0.093 |
| | | 2 | 4 | 0.11 |
| PRE-3 | Apr 1997 | 0 | 2 | 0.049 |
| | | 2 | 4 | 0.041 |
| PRE-4 | Apr 1997 | 0 | 2 | ND(0.037) |
| | | 2 | 4 | ND(0.038) |
| PRE-5 | Apr 1997 | 0 | 2 | ND(0.038) |
| | | 2 | 4 | ND(0.038) |
| | | 4 | 6 | ND(0.038) |
| PRE-6 | Apr 1997 | 0 | 2 | ND(0.039) |
| | | 2 | 4 | ND(0.038) |
| PRE-7 | Apr 1997 | 0 | 2 | ND(0.039) |
| | | 2 | 4 | ND(0.038) |
| PRE-8 | Apr 1997 | 0 | 2 | ND(0.037) |
| | | 2 | 4 | ND(0.04) |
| | | 4 | 6 | ND(0.039) |
| | | 6 | 8 | ND(0.038) |
| PRE-9 | Apr 1997 | 0 | 2 | ND(0.044) |
| | | 2 | 4 | ND(0.04) |
| | | 4 | 6 | ND(0.04) |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| PRE-10 | Apr 1997 | 0 | 2 | 0.047 |
| | | 2 | 4 | ND(0.037) |
| | | 4 | 6 | ND(0.038) |
| PRE-11 | Apr 1997 | 0 | 2 | ND(0.037) |
| | | 2 | 4 | ND(0.036) |
| | | 4 | 6 | ND(0.038) |
| PRE-12 | Apr 1997 | 0 | 2 | 0.047 |
| | | 2 | 4 | ND(0.036) |
| | | 4 | 6 | ND(0.039) |
| | | 6 | 8 | ND(0.038) |
| PRE-13 | Apr 1997 | 0 | 2 | ND(0.036) |
| | | 2 | 4 | ND(0.036) |
| | | 4 | 6 | ND(0.038) |
| | | 6 | 8 | ND(0.038) |
| | | 8 | 10 | ND(0.039) |
| PRE-14 | Apr 1997 | 0 | 2 | 0.042 |
| | | 2 | 4 | ND(0.038) |
| | | 4 | 6 | ND(0.039) |
| PRE-15 | Apr 1997 | 0 | 2 | 0.038 |
| | | 2 | 4 | ND(0.037) |
| | | 4 | 6 | ND(0.039) |
| PRE-16 | Apr 1997 | 0 | 2 | ND(0.035) |
| | | 2 | 4 | ND(0.036) |
| | | 4 | 6 | ND(0.037) |
| | | 6 | 8 | ND(0.040) |
| | | 8 | 10 | ND(0.039) |
| PRE-17 | Apr 1997 | 0 | 2 | ND(0.036) |
| | | 2 | 4 | ND(0.036) |
| | | 4 | 6 | ND(0.038) |
| | | 6 | 8 | ND(0.043) |
| | | 8 | 10 | ND(0.039) |
| PRE-18 | Apr 1997 | 0 | 2 | 0.047 |
| | | 2 | 4 | ND(0.037) |
| | | 4 | 6 | 0.090 |
| | | 6 | 8 | ND(0.037) |
| PRE-19 | Apr 1997 | 0 | 2 | ND(0.035) |
| | | 2 | 4 | ND(0.036) |
| | | 4 | 6 | 0.052 |
| | | 6 | 8 | ND(0.043) |
| | | 8 | 10 | ND(0.044) |
| PRE-20 | Apr 1997 | 0 | 2 | ND(0.079) |
| | | 2 | 4 | ND(0.037) |
| | | 4 | 6 | ND(0.044) |
| | | 6 | 8 | ND(0.042) |
| PRE-21 | Apr 1997 | 0 | 2 | 0.19 |
| | | 2 | 4 | ND(0.035) |
| | | 4 | 6 | 0.28 |
| | | 6 | 8 | ND(0.040) |
| | | 8 | 10 | ND(0.039) |
| PRE-22 | Apr 1997 | 0 | 2 | 0.143 |
| | | 2 | 4 | ND(0.037) |
| | | 4 | 6 | 1.0 |
| | | 6 | 8 | ND(0.041) |
| PRE-23 | Apr 1997 | 0 | 2 | 0.13 |
| | | 2 | 4 | ND(0.035) |
| | | 4 | 6 | 0.20 |
| | | 6 | 8 | ND(0.043) |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| PRE-23 | Apr 1997 | 8 | 10 | ND(0.042) |
| PRE-24 | Apr 1997 | 0 | 2 | 0.086 |
| | | 2 | 4 | 0.76 |
| PRE-24* | Apr 1997 | 4 | 6 | 11 |
| PRE-24 | Apr 1997 | 6 | 8 | ND(0.044) |
| PRE-25 | Apr 1997 | 0 | 2 | 0.067 |
| | | 2 | 4 | 0.18 |
| | | 4 | 6 | 0.54 |
| | | 6 | 8 | 0.45 |
| | | 8 | 10 | 0.065 |
| PRE-26 | Apr 1997 | 0 | 2 | 0.13 |
| | | 2 | 4 | 0.050 |
| AS-97-115(cap) | 04/22/97 | 0 | 0.5 | ND(0.040) |
| | | 0.5 | 1.5 | ND(0.039) |
| | | 1.5 | 2 | ND(0.038) |
| AS-97-116(cap) | 04/22/97 | 0 | 0.5 | ND(0.041) |
| | | 0.5 | 1.5 | ND(0.038) |
| | | 1.5 | 2 | ND(0.040) |
| AS-97-117(cap) | 04/22/97 | 0 | 0.5 | 0.072 |
| | | 0.5 | 1.5 | ND(0.038) |
| | | 1.5 | 2 | ND(0.037) |
| AS-97-118(cap) | 04/22/97 | 0 | 0.5 | 0.11 |
| | | 0.5 | 1.5 | ND(0.039) |
| | | 1.5 | 2 | ND(0.039) |
| AS-97-119(cap) | 04/22/97 | 0 | 0.5 | 0.096 |
| | | 0.5 | 1.5 | ND(0.040) |
| | | 1.5 | 2 | ND(0.038) |
| AS-97-120* | 04/22/97 | 0 | 0.5 | 1.9 |
| | | 0.5 | 1 | 12 |
| AS-97-121* | 04/22/97 | 0 | 0.5 | ND(0.043) |
| | | 0.5 | 1 | ND(0.040) |
| AS-97-122* | 04/22/97 | 0 | 0.5 | 1.4 |
| | | 0.5 | 1 | 4.2 |
| AS-97-123* | 04/22/97 | 0 | 0.5 | 0.084 |
| | | 0.5 | 1 | 0.053 |
| AS-97-124* | 04/22/97 | 0 | 0.5 | 1.2 |
| | | 0.5 | 1 | 11 |
| AS-97-125* | 04/22/97 | 0 | 0.5 | 0.65 |
| | | 0.5 | 1 | 8.0 |
| AS-97-126* | 04/22/97 | 0 | 0.5 | 1.1 |
| | | 0.5 | 1 | 5.6 |
| AS-97-127(cap) | 04/22/97 | 0 | 0.5 | ND(0.043) |
| | | 0.5 | 1.5 | 0.10 |
| | | 1.5 | 2 | 0.70 |
| AS-UST-1 | 04/23/97 | 0 | 0.5 | 0.86 |
| AS-UST-2 | 04/23/97 | 0 | 0.5 | 0.059 |
| ASB-1 | 04/23/97 | 0 | 0.5 | ND(0.042) |
| | | 0.5 | 1 | ND(0.039) |
| | | 1 | 3 | ND(0.037) [ND(0.037)] |
| | | 3 | 5 | ND(0.039) |
| | | 5 | 7 | ND(0.041) |
| | | 7 | 9 | ND(0.039) |
| | | 9 | 11 | ND(0.040) |
| ASB-2 | 04/23/97 | 0 | 0.5 | 0.059 |
| | | 0.5 | 1 | ND(0.041) |
| | | 1 | 3 | ND(0.036) |
| | | 3 | 5 | ND(0.038) |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| ASB-2 | 04/23/97 | 5 | 7 | ND(0.037) |
| | | 7 | 9 | ND(0.038) |
| | | 9 | 11 | ND(0.036) |
| ASB-3 | 04/23/97 | 0 | 0.5 | 0.064 |
| | | 0.5 | 1 | ND(0.036) |
| | | 1 | 3 | 0.46 |
| | | 3 | 5 | 23 |
| | | 5 | 7 | ND(0.039) |
| ASB-4* | 04/22/97 | 0 | 0.5 | 0.95 |
| | | 0.5 | 1 | 0.84 |
| | | 1 | 3 | 5.3 |
| ASB-4 | | 3 | 5 | 0.19 |
| | | 5 | 7 | ND(0.040) [ND(0.041)] |
| ASB-5 | 04/22/97 | 0 | 0.5 | ND(0.042) |
| | | 0.5 | 1 | 0.054 |
| | | 1 | 3 | ND(0.038) |
| | | 3 | 5 | ND(0.038) |
| ASB-6 | 04/23/97 | 0 | 0.5 | ND(0.035) |
| | | 0.5 | 1 | ND(0.035) |
| | | 1 | 3 | ND(0.036) |
| | | 3 | 5 | 0.020 |
| | | 5 | 7 | ND(0.035) [ND(0.035)] |
| | | 7 | 9 | ND(0.038) |
| | | 9 | 11 | ND(0.038) |
| ASB-7 | 04/23/97 | 0 | 0.5 | 0.041 |
| | | 0.5 | 1 | ND(0.035) |
| | | 1 | 3 | ND(0.035) |
| | | 3 | 5 | 0.13 |
| | | 5 | 7 | 0.45 |
| ASB-8 | 04/23/97 | 0 | 0.5 | ND(0.036) |
| | | 0.5 | 1 | ND(0.035) |
| | | 1 | 3 | ND(0.037) |
| | | 3 | 5 | 0.084 |
| | | 5 | 7 | 0.91 |
| ASB-9 | 04/23/97 | 0 | 0.5 | 0.106 |
| | | 0.5 | 1 | ND(0.037) |
| | | 1 | 3 | ND(0.037) |
| | | 3 | 5 | ND(0.035) |
| | | 5 | 7 | 3.0 J~ [ND(0.036) J~] |
| ASB-10 | 04/22/97 | 0 | 0.5 | 0.087 |
| | | 0.5 | 1 | 0.050 |
| | | 1 | 3 | 0.064 |
| | | 3 | 5 | 1.4 |
| | | 5 | 7 | 1.1 |
| ASB-11* | 06/12/97 | 0 | 0.5 | 4.2 |
| ASB-11 | 06/12/97 | 0.5 | 1 | 0.65 |
| | | 1 | 3 | 1.81 |
| | | 3 | 5 | 0.72 |
| | | 5 | 7 | ND(0.041) [ND(0.040)] |
| ASB-12 | 04/23/97 | 0 | 0.5 | 0.21 |
| | | 0.5 | 1 | 0.044 |
| | | 1 | 3 | ND(0.036) |
| | | 3 | 5 | 93 J~ [160 J~] |
| ASB-13(cap) | 04/22/97 | 0 | 0.5 | ND(0.041) |
| | | 0.5 | 2 | ND(0.039) |
| ASB-13 | 04/22/97 | 0 | 2 | 7.7 |
| | | 2 | 4 | 0.18 |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| ASB-14 | 04/23/97 | 0 | 0.5 | 0.061 |
| | | 0.5 | 2 | ND(0.035) |
| | | 2 | 4 | ND(0.036) |
| | | 4 | 6 | 0.40 |
| | | 6 | 8 | ND(0.035) |
| | | 8 | 10 | ND(0.038) |
| | | 10 | 12 | ND(0.038) |
| ASB-15 | 04/23/97 | 0 | 2 | 0.161 |
| | | 2 | 4 | ND(0.040) |
| | | 4 | 6 | ND(0.039) |
| ASB-16(cap) | 04/22/97 | 0 | 0.5 | ND(0.042) |
| | | 0.5 | 2 | ND(0.038) |
| ASB-16 | 04/22/97 | 0 | 2 | 49 |
| | | 2 | 4 | 0.46 |
| ASB-17(cap) | 04/22/97 | 0 | 0.5 | 0.057 |
| | | 0.5 | 2 | ND(0.038) |
| ASB-17 | 04/22/97 | 0 | 2 | 5.9 [6.1] |
| | | 2 | 4 | 29 |
| ASB-18(cap) | 04/22/97 | 0 | 0.5 | 0.058 |
| | | 0.5 | 2 | ND(0.039) |
| ASB-18 | 04/22/97 | 0 | 2 | 9.6 |
| | | 2 | 4 | 210 |
| ASB-19(cap) | 04/22/97 | 0 | 0.5 | 0.24 |
| | | 0.5 | 2 | 0.29 |
| ASB-19 | 04/22/97 | 0 | 2 | 460 |
| | | 2 | 4 | 810 [800] |
| ASB-20* | 06/12/97 | 0 | 0.5 | 0.064 |
| | | 0.5 | 1 | 4.2 |
| | | 1 | 3 | 42 |
| ASB-20 | 06/12/97 | 3 | 5 | 0.39 |
| | | 5 | 7 | 3.5 |
| | | 7 | 9 | 0.88 |
| ASB-21* | 06/12/97 | 0 | 0.5 | 5.3 |
| | | 0.5 | 1 | 7.6 |
| | | 1 | 3 | 2.2 |
| ASB-21 | 06/12/97 | 3 | 5 | 0.99 |
| | | 5 | 7 | 0.14 |
| | | 7 | 9 | 0.079 |
| ASB-22(cap) | 04/22/97 | 0 | 0.5 | ND(0.041) |
| | | 0.5 | 2 | 0.053 |
| ASB-22 | 04/22/97 | 0 | 2 | 22 |
| | | 2 | 4 | 1.4 |
| SCH-1 | 04/28/97 | 0 | 0.5 | 0.16 |
| | | 0.5 | 2 | ND(0.039) |
| | | 2 | 4 | ND(0.036) |
| | | 4 | 6 | ND(0.038) |
| | | 6 | 8 | ND(0.038) |
| | | 8 | 10 | ND(0.038) |
| | | 10 | 12 | ND(0.038) |
| | | 12 | 14 | ND(0.038) |
| | | 14 | 16 | ND(0.038) |
| | | 16 | 18 | ND(0.037) |
| | | 18 | 20 | ND(0.037) |
| | | 20 | 22 | ND(0.038) |
| SCH-2 | 04/29/97 | 0 | 0.5 | 0.43 |
| | | 0.5 | 1 | 0.47 |
| | | 2 | 4 | 0.099 |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| SCH-2 | 04/29/97 | 4 | 6 | ND(0.040) |
| | | 6 | 8 | ND(0.037) |
| | | 8 | 10 | ND(0.038) |
| | | 10 | 12 | ND(0.038) |
| SCH-3 | 04/28/97 | 0 | 0.5 | 0.12 |
| | | 0.5 | 1 | 0.094 |
| | | 1 | 2 | ND(0.037) |
| | | 2 | 4 | ND(0.041) |
| | | 4 | 6 | ND(0.037) |
| | | 6 | 8 | ND(0.037) |
| | | 11 | 13 | ND(0.039) |
| SCH-4 | 04/30/97 | 0 | 0.5 | 0.061 |
| | | 0.5 | 1 | ND(0.036) |
| | | 1 | 2 | ND(0.037) |
| | | 2 | 4 | 0.086 |
| | | 4 | 6 | ND(0.040) |
| | | 6 | 8 | 0.32 |
| | | 8 | 10 | ND(0.038) |
| | | 10 | 12 | ND(0.040) |
| | | 12 | 14 | ND(0.039) |
| | | 14 | 16 | ND(0.039) |
| | | 16 | 18 | ND(0.042) |
| K11-7-28-SS-1 | 02/23/98 | 0 | 0.5 | 0.15 |
| | | 0.5 | 1 | 0.13 |
| K11-7-28-SS-2 | 02/23/98 | 0 | 0.5 | 0.41 |
| | | 0.5 | 1 | 0.29 |
| AS-96-80 | 02/17/98 | 0 | 0.5 | 0.13 |
| AS-98-128* | 02/17/98 | 0 | 0.5 | 0.09 |
| AS-98-129 | 02/17/98 | 0 | 0.5 | 0.24 |
| AS-98-130 | 02/17/98 | 0 | 0.5 | 0.078 |
| AS-98-131* | 02/17/98 | 0 | 0.5 | 0.26 [0.23] |
| AS-98-132 | 02/17/98 | 0 | 0.5 | 0.090 |
| AS-98-133 | 02/17/98 | 0 | 0.5 | 0.086 |
| AS-98-134* | 03/16/98 | 0 | 0.5 | ND(0.046) |
| | | 0.5 | 1 | 2.8 |
| AS-98-134 | 03/16/98 | 1 | 3 | 0.13 |
| ASB-23 | 02/19/98 | 1 | 3 | 0.32 |
| | | 3 | 5 | 0.043 |
| | | 5 | 7 | ND(0.037) |
| ASB-24 | 02/19/98 | 0 | 0.5 | ND(0.036) |
| | | 0.5 | 1 | ND(0.035) |
| | | 1 | 3 | ND(0.035) |
| | | 3 | 5 | ND(0.037) |
| | | 5 | 7 | ND(0.036) |
| ASB-25 | 02/19/98 | 0 | 0.5 | 0.11 |
| | | 0.5 | 1 | ND(0.035) |
| | | 1 | 3 | ND(0.038) |
| | | 3 | 5 | 0.096 [0.15] |
| | | 5 | 7 | 0.045 [0.088] |
| ASB-26 | 02/17/98 | 0 | 2 | 5.6 |
| | | 2 | 4 | 1.8 |
| | | 4 | 6 | 6.7 |
| | | 6 | 8 | 0.22 |
| ASB-27 | 02/17/98 | 0 | 2 | 25 |
| | | 2 | 4 | 2.6 |
| | | 4 | 6 | 0.12 |
| | | 6 | 8 | 7.0 J~ [0.21 J~] |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| ASB-28 | 02/17/98 | 0 | 2 | 87 |
| | | 2 | 4 | 440 |
| | | 4 | 6 | 0.64 |
| | | 6 | 8 | 0.27 |
| ASB-29 | 02/18/98 | 0 | 2 | 2.5 |
| | | 2 | 4 | 1.4 |
| | | 4 | 6 | 1.6 |
| | | 6 | 8 | 0.058 |
| | | 8 | 10 | 7.1 |
| ASB-30 | 02/18/98 | 0 | 2 | 12 |
| | | 2 | 4 | 27 |
| | | 4 | 6 | 20 |
| | | 6 | 8 | 0.11 |
| | | 8 | 10 | 0.066 J~ [0.34 J~] |
| ASB-31 | 02/18/98 | 0 | 2 | 1.0 |
| | | 2 | 4 | 67 |
| | | 4 | 6 | 23 |
| | | 6 | 8 | 0.59 |
| | | 8 | 10 | ND(0.041) |
| ASB-32 | 02/18/98 | 0 | 2 | 12 |
| | | 2 | 4 | 33 |
| | | 4 | 6 | 4.4 |
| | | 6 | 8 | 0.15 |
| ASB-33 | 02/18/98 | 0 | 2 | 2.5 |
| | | 2 | 4 | 43 |
| | | 4 | 6 | 18 |
| | | 6 | 8 | ND(0.040) |
| ASB-34 | 02/18/98 | 0 | 2 | 95 |
| | | 2 | 4 | 109 |
| | | 4 | 6 | 2.0 |
| | | 6 | 8 | 0.13 |
| | | 8 | 10 | 2.6 |
| ASB-35 | 02/25/98 | 0 | 0.5 | 0.068 |
| | | 0.5 | 1 | 0.048 J~ [2.8 J~] |
| | | 1 | 3 | ND(0.036) |
| ASB-36 | 02/25/98 | 0 | 0.5 | 0.040 |
| | | 0.5 | 1 | 0.19 |
| | | 1 | 3 | 0.058 |
| ASB-37* | 02/25/98 | 0 | 0.5 | 1.8 |
| | | 0.5 | 1 | 4.1 J~ [0.059 J~] |
| | | 1 | 3 | 19 |
| ASB-38 | 02/25/98 | 0 | 0.5 | ND(0.056) |
| | | 0.5 | 1 | 6.4 [4.5] |
| | | 1 | 3 | 17 |
| ASB-39* | 02/25/98 | 0 | 0.5 | 23 |
| | | 0.5 | 1 | 18 |
| | | 1 | 3 | 0.15 |
| ASB-40* | 02/25/98 | 0 | 0.5 | 1.2 |
| | | 0.5 | 1 | 11 |
| | | 1 | 3 | 16 |
| ASB-41* | 02/25/98 | 0 | 0.5 | 5.7 |
| | | 0.5 | 1 | 1.4 |
| ASB-41 | 02/25/98 | 1 | 3 | 0.54 |
| ASB-42* | 02/25/98 | 0 | 0.5 | ND(0.050) |
| | | 0.5 | 1 | 3.4 |
| | | 1 | 3 | 4.8 |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| ASB-43* | 02/25/98 | 0 | 0.5 | 11 |
| | | 0.5 | 1 | 2.8 |
| ASB-43 | 02/25/98 | 1 | 3 | ND(0.041) |
| ASB-44* | 02/25/98 | 0 | 0.5 | 0.44 |
| | | 0.5 | 1 | 0.58 |
| ASB-44 | 02/25/98 | 1 | 3 | 0.8 |
| ASB-45* | 02/25/98 | 0 | 0.5 | 4.9 |
| | | 0.5 | 1 | 49 |
| ASB-45 | 02/25/98 | 1 | 3 | 1.3 |
| ASB-46* | 02/25/98 | 0 | 0.5 | 7.0 |
| | | 0.5 | 1 | 19 |
| | | 1 | 3 | 94 |
| ASB-47 | 02/25/98 | 0 | 0.5 | 0.59 |
| | | 0.5 | 1 | 0.55 |
| | | 1 | 3 | 1.8 |
| ASB-48* | 02/25/98 | 0 | 0.5 | 0.08 |
| | | 0.5 | 1 | 2.9 |
| | | 1 | 3 | 1.1 |
| ASB-49 | 02/25/98 | 0 | 0.5 | 0.061 |
| | | 0.5 | 1 | 0.45 |
| | | 1 | 3 | 1.4 |
| ASB-50 | 02/25/98 | 0 | 0.5 | 0.49 |
| | | 0.5 | 1 | 0.21 |
| | | 1 | 3 | ND(0.051) |
| ASB-51* | 03/16/98 | 0 | 0.5 | 1.0 |
| | | 0.5 | 1 | 2.0 |
| | | 1 | 3 | 14 J~ [40 J~] |
| ASB-52 | 03/16/98 | 1 | 3 | 1.8 |
| | | 3 | 5 | 0.044 |
| | | 5 | 7 | ND(0.041) |
| | | 7 | 9 | ND(0.039) |
| | | 9 | 11 | ND(0.037) |
| ASB-53 | 03/16/98 | 1 | 3 | 0.27 |
| ASB-54 | 03/16/98 | 1 | 3 | 0.92 |
| ASB-55 | 03/16/98 | 3 | 5 | 8.4 |
| | | 5 | 7 | ND(0.037) |
| | | 7 | 9 | 0.93 |
| ASB-56 | 03/16/98 | 1 | 3 | 0.12 |
| ASB-57 | 03/16/98 | 1 | 3 | 0.32 [0.37J~] |
| ASB-58 | 03/16/98 | 1 | 3 | ND(0.041) |
| ASB-59 | 03/16/98 | 1 | 3 | 0.25 |
| ASB-60 | 03/16/98 | 1 | 3 | ND(0.040) |
| ASB-61 | 03/16/98 | 1 | 3 | 0.43 |
| A-01 | 04/22/99 | 0 | 2 | ND(0.033) |
| | | 2 | 4 | ND(0.035) |
| | | 4 | 6 | 0.26 |
| | | 6 | 8 | 1.0 |
| | | 8 | 10 | 5.8 |
| | | 10 | 12 | ND(0.040) |
| | | 12 | 14 | 0.10 |
| | | 14 | 15 | ND(0.037) |
| A-02 | 04/22/99 | 0 | 2 | ND(0.035) |
| | | 2 | 4 | ND(0.035) |
| | | 4 | 6 | 12 [8.8] |
| | | 6 | 8 | 28 |
| | | 8 | 10 | 0.13 |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| A-02 | 04/22/99 | 10 | 12 | ND(0.043) |
| | | 12 | 14 | ND(0.050) |
| | | 14 | 15 | 0.13 |
| A-03 | 04/23/99 | 4 | 6 | 0.10 |
| | | 6 | 8 | 3.0 |
| | | 8 | 10 | 0.32 |
| | | 10 | 12 | ND(0.039) |
| A-04 | 04/21/99 | 4 | 6 | ND(0.038) |
| | | 6 | 8 | ND(0.037) |
| | | 8 | 10 | ND(0.037) |
| | | 10 | 12 | ND(0.041) |
| A-05 | 04/25/99 | 10 | 12 | ND(0.038) |
| | | 12 | 14 | 0.43 [0.31] |
| | | 14 | 15 | ND(0.043) |
| A-06 | 04/25/99 | 10 | 12 | 0.17 |
| A-07 | 04/24/99 | 8 | 10 | ND(0.037) |
| A-08 | 04/25/99 | 8 | 10 | 0.067 |
| A-09 | 04/20/99 | 8 | 10 | 0.048 |
| A-10 | 04/25/99 | 4 | 6 | 0.18 |
| | | 8 | 10 | ND(0.039) |
| A-11 | 04/24/99 | 8 | 10 | ND(0.039) |
| A-12 | 04/24/99 | 8 | 10 | ND(0.039) |
| A-13 | 04/24/99 | 2 | 4 | 0.46 J~ |
| | | 4 | 6 | 0.11 J~ |
| | | 8 | 10 | 0.16 |
| A-14 | 04/22/99 | 0 | 2 | ND(0.039) |
| | | 2 | 4 | 0.26 |
| | | 4 | 6 | ND(0.044) |
| | | 6 | 8 | ND(0.041) |
| A-15 | 04/23/99 | 2 | 4 | 2.7 |
| | | 4 | 6 | ND(0.038) |
| | | 6 | 8 | ND(0.048) |
| | | 8 | 10 | 0.24 |
| A-16 | 04/23/99 | 4 | 6 | 0.074 |
| | | 6 | 8 | 0.16 |
| A-17 | 04/22/99 | 0 | 2 | 2.1 |
| | | 2 | 4 | 0.60 |
| | | 4 | 6 | ND(0.043) [ND(0.042)] |
| | | 6 | 8 | ND(0.039) |
| A-18 | 04/25/99 | 4 | 6 | ND(0.036) |
| A-19 | 04/24/99 | 4 | 6 | 0.24 |
| | | 8 | 10 | ND(0.038) |
| A-20 | 04/22/99 | 2 | 4 | 11 |
| | | 4 | 6 | 0.52 J~ |
| | | 8 | 10 | ND(0.044) |
| A-21 | 04/24/99 | 2 | 4 | ND(0.037) |
| | | 4 | 6 | 0.066 J~ |
| A-22 | 04/25/99 | 4 | 6 | 13 |
| | | 6 | 8 | ND(0.050) |
| | | 8 | 10 | ND(0.039) J~ |
| A-23 | 04/23/99 | 2 | 4 | 2.3 |
| | | 4 | 6 | ND(0.040) |
| | | 6 | 8 | ND(0.043) |
| | | 8 | 10 | ND(0.045) [ND(0.044)] |

(See notes on page 24)

**TABLE 1**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PCB DATA**
(Results presented in parts per million, ppm)

| Sample ID | Date Collected | Start Depth (ft) | End Depth (ft) | Total PCBs |
|---|---|---|---|---|
| A-24 | 04/22/99 | 2 | 4 | ND(0.040) |
| | | 4 | 6 | ND(0.039) |
| | | 6 | 8 | ND(0.037) |
| | | 8 | 10 | ND(0.040) |
| A-25 | 04/21/99 | 2 | 4 | ND(0.037) |
| | | 4 | 6 | ND(0.037) |
| | | 6 | 8 | ND(0.038) J~ |
| | | 8 | 10 | ND(0.038) J~ |
| A-26 | 04/24/99 | 8 | 10 | 2.7 |
| | | 10 | 12 | 0.046 |
| A-27 | 04/20/99 | 0 | 2 | 4.0 J~ |
| | | 2 | 4 | 6.5 |
| | | 4 | 6 | ND(0.044) |
| | | 6 | 8 | ND(0.037) |
| | | 8 | 10 | 0.14 |
| A-28 | 05/12/99 | 2 | 4 | 0.37 J~ [0.16 J~] |
| A-29 | 05/12/99 | 2 | 4 | 0.042 |

Notes:
1. With the exception of cap material, start depth and end depth elevations are relative to ground surface prior to installation of the surface cover.
2. ND(0.26) - Compound was not detected. The value in parentheses is the associated quantitation limit.
3. Duplicate results are presented in brackets.
4. J~ - Indicates the reported value is estimated due to data validation qualification.
5. * - Sample representative of soil subject to prior removal.
6. (cap) - Sample representative of existing cap material.

**TABLE 2**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL VOLATILE ORGANICS DATA**
(Concentrations are presented in dry weight parts per million, ppm)

| Parameter | Sample ID: | K-16 | K-17 | K-18 | K-19 | K-20 | ASB-3 | ASB-11 | ASB-19 |
|---|---|---|---|---|---|---|---|---|---|
| | Sample Depth (feet): | 0-1.5 | 0-1.5 | 0-1.5 | 0-1.5 | 0-1.5 | 3 - 5 | 3 - 5 | 0 - 2 |
| | Date Collected: | 7/90 | 7/90 | 7/90 | 7/90 | 7/90 | 04/23/97 | 06/12/97 | 04/22/97 |
| **Volatile Organics** | | | | | | | | | |
| Chlorobenzene | | ND(0.006) | ND(0.006) [ND(0.006)] | ND(0.006) | ND(0.006) | ND(0.006) | ND(0.0050) | ND(0.0060) | 0.009 |
| Acetone | | ND(0.012) | ND(0.006) [ND(0.006)] | ND(0.012) | 0.014 | 0.009 | ND(0.011) | ND(0.012) | ND(0.012) |
| 2-Butanone | | ND(0.012) | ND(0.006) [ND(0.006)] | ND(0.012) | ND(0.012) | ND(0.006) | ND(0.011) | ND(0.012) | ND(0.012) |
| Methylene Chloride | | 0.009 | 0.009[0.006] | 0.007 | 0.004 | 0.004 | ND(0.0050) | ND(0.0060) | ND(0.0060) |

| Parameter | Sample ID: | SCH-1 | SCH-2 | SCH-3 | SCH-4 | AS-98-129 | AS-98-130 | AS-98-132 | AS-98-133 |
|---|---|---|---|---|---|---|---|---|---|
| | Sample Depth (feet): | 8 - 10 | 6 - 8 | 2 - 4 | 8 - 10 | 0 - 0.5 | 0 - 0.5 | 0 - 0.5 | 0 - 0.5 |
| | Date Collected: | 04/28/97 | 04/29/97 | 04/28/97 | 04/30/97 | 02/17/98 | 02/17/98 | 02/17/98 | 02/17/98 |
| **Volatile Organics** | | | | | | | | | |
| Chlorobenzene | | ND(0.0060) | ND(0.0060) | ND(0.0060) | ND(0.0060) | ND(0.0093) | ND(0.0067) | ND(0.0072) | ND(0.0059) |
| Acetone | | ND(0.011) | ND(0.011) | ND(0.012) | ND(0.012) | ND(0.019) | ND(0.013) | ND(0.014) | ND(0.12) |
| 2-Butanone | | ND(0.011) | ND(0.011) | ND(0.012) | ND(0.012) | ND(0.019) | ND(0.013) | ND(0.014) | ND(0.12) |
| Methylene Chloride | | ND(0.0060) | ND(0.0060) | ND(0.0060) | ND(0.0060) | ND(0.0093) | ND(0.0067) | ND(0.0072) | ND(0.0059) |

| Parameter | Sample ID: | ASB-23 | ASB-24 | ASB-25 | ASB-26 | ASB-26 | ASB-26 | ASB-27 | ASB-27 |
|---|---|---|---|---|---|---|---|---|---|
| | Sample Depth (feet): | 5 - 7 | 5 - 7 | 5 - 7 | 0 - 2 | 2 - 4 | 4 - 6 | 0 - 2 | 2 - 4 |
| | Date Collected: | 02/19/98 | 02/19/98 | 02/19/98 | 02/17/98 | 02/17/98 | 02/17/98 | 02/17/98 | 02/17/98 |
| **Volatile Organics** | | | | | | | | | |
| Chlorobenzene | | ND(0.0057) | ND(0.0054) | ND(0.0058)[ND(0.0064)] | ND(0.0061) | ND(0.0057) | ND(0.0058) | ND(0.0055) | ND(0.0061) |
| Acetone | | ND(0.011) | ND(0.011) | ND(0.012) [ND(0.013)] | ND(0.012) | ND(0.011) | ND(0.012) | ND(0.011) | ND(0.012) |
| 2-Butanone | | ND(0.011) | ND(0.011) | ND(0.012) [ND(0.013)] | ND(0.012) | ND(0.011) | ND(0.012) | ND(0.011) | ND(0.012) |
| Methylene Chloride | | ND(0.0057) | ND(0.0054) | ND(0.0058)[ND(0.0064)] | ND(0.0061) | ND(0.0057) | ND(0.0058) | ND(0.0055) | ND(0.0061) |

**TABLE 2**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL VOLATILE ORGANICS DATA**
(Concentrations are presented in dry weight parts per million, ppm)

| Parameter | Sample ID: / Sample Depth (feet): / Date Collected: | ASB-27 4 - 6 02/17/98 | ASB-27 6 - 8 02/17/98 | ASB-28 6 - 8 02/17/98 | ASB-29 0 - 2 02/18/98 | ASB-29 2 - 4 02/18/98 | ASB-30 0 - 2 02/18/98 | ASB-30 8 - 10 02/18/98 | ASB-31 0 - 2 02/18/98 |
|---|---|---|---|---|---|---|---|---|---|
| **Volatile Organics** | | | | | | | | | |
| Chlorobenzene | | ND(0.0060) | ND(0.0061) | ND(0.0062) | ND(0.0061) | ND(0.0057) | ND(0.0058) | ND(0.0060) | ND(0.0059) |
| Acetone | | 0.047 | ND(0.012) | ND(0.012) | ND(0.012) | ND(0.011) | ND(0.012) | ND(0.012) | ND(0.012) |
| 2-Butanone | | 0.015 | ND(0.012) | ND(0.012) | ND(0.012) | ND(0.011) | ND(0.012) | ND(0.012) | ND(0.012) |
| Methylene Chloride | | ND(0.0060) | ND(0.0061) | ND(0.0062) | ND(0.0061) | ND(0.0057) | ND(0.0058) | ND(0.0060) | ND(0.0059) |

| Parameter | Sample ID: / Sample Depth (feet): / Date Collected: | ASB-31 2 - 4 02/18/98 | ASB-31 4 - 6 02/18/98 | ASB-31 6 - 8 02/18/98 | ASB-31 8 - 10 02/18/98 | ASB-32 6 - 8 02/18/98 | ASB-33 0 - 2 02/18/98 | ASB-34 2 - 4 02/18/98 | ASB-34 4 - 6 02/18/98 |
|---|---|---|---|---|---|---|---|---|---|
| **Volatile Organics** | | | | | | | | | |
| Chlorobenzene | | ND(0.0056) | ND(0.006) | ND(0.0060) | ND(0.0062) | ND(0.0062) | ND(0.0064) | ND(0.0078) | ND(0.0085) |
| Acetone | | ND(0.011) | ND(0.012) | ND(0.012) | ND(0.012) | ND(0.012) | ND(0.013) | ND(0.016) | ND(0.017) |
| 2-Butanone | | ND(0.011) | ND(0.012) | ND(0.012) | ND(0.012) | ND(0.012) | ND(0.013) | ND(0.016) | ND(0.017) |
| Methylene Chloride | | ND(0.0056) | ND(0.006) | ND(0.006) | ND(0.0062) | ND(0.0062) | ND(0.0064) | ND(0.0078) | ND(0.0085) |

| Parameter | Sample ID: / Sample Depth (feet): / Date Collected: | AS-96-33 0-0.5 10/17/96 | AS-96-33 0.5-1 10/17/96 | AS-96-31 0.5-1 10/17/96 | AS-96-95 0-0.5 10/22/96 | AS-96-95 0.5-1 10/22/96 | AS-96-18 0-0.5 10/16/96 |
|---|---|---|---|---|---|---|---|
| **Volatile Organics** | | | | | | | |
| Chlorobenzene | | ND(0.006) | ND(0.005) | ND(0.006) | ND(0.007) | ND(0.006) | ND(0.006) |
| Acetone | | ND(0.012) | ND(0.010) | ND(0.012) | ND(O.014) | ND(0.012) | ND(0.012) |
| 2-Butanone | | ND(0.012) | ND(0.010) | ND(0.012) | ND(0.014) | ND(0.012) | ND(0.012) |
| Methylene Chloride | | ND(0.006) | ND(0.005) | ND(0.006) | ND(0.007) | ND(0.006) | ND(0.006) |

Notes:
1. Sample depth elevations are relative to the ground surface prior to installation of the surface cover.
2. Samples were analyzed for Appendix IX+3 volatile organic compounds; only those constituents detected in at least one sample are shown.
3. ND (0.0058) - Compound was not detected. The value in parentheses is the associated quantitation limit.
4. Duplicate results are presented in brackets.

**TABLE 3**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL SEMIVOLATILE ORGANICS DATA**
(Concentrations are presented in dry weight parts per million, ppm)

| Parameter | Sample ID: | K-16 | K-17 | K-18 | K-19 | K-20 | ASB-3 | ASB-11 | ASB-19 |
|---|---|---|---|---|---|---|---|---|---|
| | Sample Depth (feet): | 0-1.5 | 0-1.5 | 0-1.5 | 0-1.5 | 0-1.5 | 3 - 5 | 3-5 | 0-2 |
| | Date Collected: | 7/90 | 7/90 | 7/90 | 7/90 | 7/90 | 04/23/97 | 06/12/97 | 04/22/97 |
| **Semivolatile Organics** | | | | | | | | | |
| 1,2,4,5-Tetrachlorobenzene | | ND(0.38) | ND(0.37) [ND(0.38)] | ND(0.40) | ND(0.39) | ND(0.41) | ND(3.6) | ND(0.39) | 0.63 |
| 1,2,4-Trichlorobenzene | | ND(0.38) | ND(0.37) [ND(0.38)] | ND(0.40) | ND(0.39) | ND(0.41) | ND(3.6) | ND(0.39) | 0.29 J |
| 1,4-Dichlorobenzene | | ND(0.38) | ND(0.37) [ND(0.38)] | ND(0.40) | ND(0.39) | ND(0.41) | ND(3.6) | ND(0.39) | 0.12 J |
| 2-Methylnaphthalene | | ND(0.38) | ND(0.37) [ND(0.38)] | ND(0.40) | ND(0.39) | ND(0.41) | 0.96 J | ND(0.39) | ND(0.40) |
| Acenaphthene | | ND(0.38) | ND(0.37) [ND(0.38)] | ND(0.40) | ND(0.39) | ND(0.41) | 1.0 J | ND(0.39) | ND(0.40) |
| Acenaphthylene | | ND(0.38) | ND(0.37) [ND(0.38)] | ND(0.40) | ND(0.39) | ND(0.41) | 2.8 J | ND(0.39) | ND(0.40) |
| Anthracene | | ND(0.38) | ND(0.37) [ND(0.38)] | ND(0.40) | ND(0.39) | ND(0.41) | 3.8 | ND(0.39) | 0.093 J |
| Benzo(a)anthracene | | ND(0.38) | 0.038[ND(0.38)] | 0.05 | ND(0.39) | ND(0.41) | 15 | ND(0.39) | ND(0.40) |
| Benzo(a)pyrene | | 0.046 | 0.052[[ND(0.38)] | 0.065 | ND(0.39) | ND(0.41) | 16 | ND(0.39) | 0.053 J |
| Benzo(b)fluoranthene | | 0.051 | 0.069[[ND(0.38)] | 0.082 | 0.046 | ND(0.41) | 14 | ND(0.39) | 0.065 J |
| Benzo(g,h,i)perylene | | ND(0.38) | 0.041[ND(0.38)] | 0.052 | ND(0.39) | ND(0.41) | 3.7 | ND(0.39) | ND(0.40) |
| Benzo(k)fluoranthene | | 0.045 | 0.058[ND(0.38)] | 0.069 | 0.044 | ND(0.41) | 12 | ND(0.39) | 0.072 J |
| Bis(2-ethylhexyl)phthalate | | 0.21 | 0.240[0.270] | 0.27 | 0.21 | 0.3 | ND(3.6) | 0.10 J | ND(0.40) |
| Chrysene | | ND(0.38) | 0.084[ND(0.38)] | 0.1 | 0.059 | ND(0.41) | 16 | ND(0.39) | ND(0.40) |
| Di-n-butylphthalate | | ND(0.38) | ND(0.37) [ND(0.38)] | ND(0.40) | ND(0.39) | ND(0.41) | ND(3.6) | ND(0.39) | 0.061 J |
| Dibenz(a,h)anthracene | | ND(0.38) | ND(0.37) [ND(0.38)] | ND(0.40) | ND(0.39) | ND(0.41) | 2.5 J | ND(0.39) | ND(0.40) |
| Dibenzofuran | | ND(0.38) | ND(0.37) [ND(0.38)] | ND(0.40) | ND(0.39) | ND(0.41) | 0.84 J | ND(0.39) | ND(0.40) |
| Fluoranthene | | 0.1 | 0.130[0.065] | 0.16 | 0.09 | 0.055 | 22 | ND(0.39) | 0.12 J |
| Fluorene | | ND(0.38) | ND(0.37) [ND(0.38)] | ND(0.40) | ND(0.39) | ND(0.41) | 1.1 J | ND(0.39) | ND(0.40) |
| Indeno(1,2,3-cd)pyrene | | ND(0.38) | ND(0.37) [ND(0.38)] | 0.044 | ND(0.39) | ND(0.41) | 3.8 | ND(0.39) | ND(0.40) |
| Naphthalene | | ND(0.38) | ND(0.37) [ND(0.38)] | ND(0.40) | ND(0.39) | ND(0.41) | 1.9 J | ND(0.39) | ND(0.40) |
| Phenanthrene | | 0.057 | 0.069[ND(0.38)] | 0.087 | 0.047 | ND(0.41) | 12 | ND(0.39) | 0.083 J |
| Pyrene | | 0.11 | 0.130[0.066] | 0.17 | 0.088 | 0.068 | 20 | ND(0.39) | 0.10 J |

(See notes on page 5)

**TABLE 3**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL SEMIVOLATILE ORGANICS DATA**
(Concentrations are presented in dry weight parts per million, ppm)

| Parameter | Sample ID: | SCH-1 | SCH-2 | SCH-3 | SCH-4 | AS-98-129 | AS-98-130 | AS-98-132 | AS-98-133 |
|---|---|---|---|---|---|---|---|---|---|
| | Sample Depth (feet): | 8 - 10 | 6 - 8 | 2 - 4 | 8 - 10 | 0 - 0.5 | 0 - 0.5 | 0 - 0.5 | 0 - 0.5 |
| | Date Collected: | 04/28/97 | 04/29/97 | 04/28/97 | 04/30/97 | 02/17/98 | 02/17/98 | 02/17/98 | 02/17/98 |
| **Semivolatile Organics** | | | | | | | | | |
| 1,2,4,5-Tetrachlorobenzene | | ND(0.38) | ND(0.37) | ND(0.41) | ND(0.38) | ND(0.62) | ND(0.44) | ND(0.47) | ND(0.39) |
| 1,2,4-Trichlorobenzene | | ND(0.38) | ND(0.37) | ND(0.41) | ND(0.38) | ND(0.62) | ND(0.44) | ND(0.47) | ND(0.39) |
| 1,4-Dichlorobenzene | | ND(0.38) | ND(0.37) | ND(0.41) | ND(0.38) | ND(0.62) | ND(0.44) | ND(0.47) | ND(0.39) |
| 2-Methylnaphthalene | | ND(0.38) | ND(0.37) | ND(0.41) | ND(0.38) | ND(0.62) | ND(0.44) | ND(0.47) | ND(0.39) |
| Acenaphthene | | ND(0.38) | ND(0.37) | ND(0.41) | ND(0.38) | 0.092 J | ND(0.44) | ND(0.47) | ND(0.39) |
| Acenaphthylene | | ND(0.38) | ND(0.37) | 0.13 J | ND(0.38) | 0.48 J | ND(0.44) | ND(0.47) | 0.071 J |
| Anthracene | | ND(0.38) | ND(0.37) | 0.081 J | ND(0.38) | 0.39 J | 0.098 J | ND(0.47) | 0.056 J |
| Benzo(a)anthracene | | ND(0.38) | ND(0.37) | 0.49 | ND(0.38) | 2.1 | 0.30 J | 0.090 J | 0.29 J |
| Benzo(a)pyrene | | ND(0.38) | ND(0.37) | 0.64 | ND(0.38) | 2.4 | 0.29 J | 0.11 J | 0.33 J |
| Benzo(b)fluoranthene | | ND(0.38) | ND(0.37) | 0.59 | ND(0.38) | 2.5 | 0.26 J | 0.10 J | 0.36 J |
| Benzo(g,h,i)perylene | | ND(0.38) | ND(0.37) | 0.22 J | ND(0.38) | 1.2 | ND(0.44) | ND(0.47) | ND(0.39) |
| Benzo(k)fluoranthene | | ND(0.38) | ND(0.37) | 0.64 | ND(0.38) | 1.8 | 0.26 J | 0.090 J | 0.30 J |
| Bis(2-ethylhexyl)phthalate | | 0.14 BJ | 0.088 BJ | 0.51 B | 0.095 BJ | ND(0.62) | ND(0.44) | ND(0.47) | ND(0.39) |
| Chrysene | | ND(0.38) | ND(0.37) | 0.79 | ND(0.38) | 2.9 | 0.35 J | 0.13 J | 0.39 |
| Di-n-butylphthalate | | ND(0.38) | ND(0.37) | ND(0.41) | ND(0.38) | ND(0.62) | ND(0.44) | 0.052 J | ND(0.39) |
| Dibenz(a,h)anthracene | | ND(0.38) | ND(0.37) | 0.078 J | ND(0.38) | 0.50 J | ND(0.44) | ND(0.47) | ND(0.39) |
| Dibenzofuran | | ND(0.38) | ND(0.37) | ND(0.41) | ND(0.38) | ND(0.62) | ND(0.44) | ND(0.47) | ND(0.39) |
| Fluoranthene | | ND(0.38) | ND(0.37) | 1.2 | ND(0.38) | 4.6 | 0.71 | 0.19 J | 0.56 |
| Fluorene | | ND(0.38) | ND(0.37) | ND(0.41) | ND(0.38) | 0.27 J | ND(0.44) | ND(0.47) | ND(0.39) |
| Indeno(1,2,3-cd)pyrene | | ND(0.38) | ND(0.37) | 0.21 J | ND(0.38) | 1.3 | 0.20 J | ND(0.47) | 0.13 J |
| Naphthalene | | ND(0.38) | ND(0.37) | ND(0.41) | ND(0.38) | ND(0.62) | ND(0.44) | ND(0.47) | ND(0.39) |
| Phenanthrene | | ND(0.38) | ND(0.37) | 0.59 | ND(0.38) | 2.6 | 0.44 | 0.090 J | 0.25 J |
| Pyrene | | ND(0.38) | ND(0.37) | 1.3 | ND(0.38) | 4.0 | 0.59 | 0.14 J | 0.56 |

(See notes on page 5)

**TABLE 3**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL SEMIVOLATILE ORGANICS DATA**
(Concentrations are presented in dry weight parts per million, ppm)

| Parameter | Sample ID: | ASB-23 | ASB-24 | ASB-25 | ASB-26 | ASB-27 | ASB-28 | ASB-29 | ASB-30 |
|---|---|---|---|---|---|---|---|---|---|
| | Sample Depth (feet): | 5 - 7 | 5 - 7 | 5 - 7 | 2 - 4 | 2 - 4 | 6 - 8 | 2 - 4 | 0 - 2 |
| | Date Collected: | 02/19/98 | 02/19/98 | 02/19/98 | 02/17/98 | 02/17/98 | 02/17/98 | 02/18/98 | 02/18/98 |
| **Semivolatile Organics** | | | | | | | | | |
| 1,2,4,5-Tetrachlorobenzene | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.42)] | ND(0.40) | ND(0.40) | ND(0.41) | ND(0.37) | ND(0.39) |
| 1,2,4-Trichlorobenzene | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.38)] | ND(0.40) | ND(0.40) | ND(0.41) | ND(0.37) | ND(0.39) |
| 1,4-Dichlorobenzene | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.42)] | ND(0.40) | ND(0.40) | ND(0.41) | ND(0.37) | ND(0.39) |
| 2-Methylnaphthalene | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.38)] | ND(0.40) | ND(0.40) | ND(0.41) | ND(0.37) | ND(0.39) |
| Acenaphthene | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.42)] | 0.050 J | ND(0.40) | ND(0.41) | ND(0.37) | ND(0.39) |
| Acenaphthylene | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.42)] | 0.11 J | 0.10 J | ND(0.41) | ND(0.37) | ND(0.39) |
| Anthracene | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.42)] | 0.15 J | 0.056 J | ND(0.41) | ND(0.37) | ND(0.39) |
| Benzo(a)anthracene | | ND(0.37) | ND(0.36) | ND(0.38) [0.068 J] | 0.79 | 0.20 J | ND(0.41) | ND(0.37) | ND(0.39) |
| Benzo(a)pyrene | | ND(0.37) | ND(0.36) | ND(0.38) [0.066 J] | 0.95 | 0.27 J | ND(0.41) | ND(0.37) | ND(0.39) |
| Benzo(b)fluoranthene | | ND(0.37) | ND(0.36) | ND(0.38) [0.065 J] | 0.83 | 0.22 J | ND(0.41) | ND(0.37) | ND(0.39) |
| Benzo(g,h,i)perylene | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.42)] | 0.79 | ND(0.40) | ND(0.41) | ND(0.37) | ND(0.39) |
| Benzo(k)fluoranthene | | ND(0.37) | ND(0.36) | ND(0.38) [0.075 J] | 0.72 | 0.22 J | ND(0.41) | ND(0.37) | ND(0.39) |
| Bis(2-ethylhexyl)phthalate | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.42)] | ND(0.40) | ND(0.40) | ND(0.41) | ND(0.37) | ND(0.39) |
| Chrysene | | ND(0.37) | ND(0.36) | ND(0.38) [0.088 J] | 1.2 | 0.42 | ND(0.41) | ND(0.37) | 0.057 J |
| Di-n-butylphthalate | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.42)] | ND(0.40) | ND(0.40) | ND(0.41) | ND(0.37) | ND(0.39) |
| Dibenz(a,h)anthracene | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.42)] | 0.24 J | ND(0.40) | ND(0.41) | ND(0.37) | ND(0.39) |
| Dibenzofuran | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.38)] | ND(0.40) | ND(0.40) | ND(0.41) | ND(0.37) | ND(0.39) |
| Fluoranthene | | ND(0.37) | ND(0.36) | ND(0.38) [0.16 J)] | 1.8 | 0.52 | ND(0.41) | 0.046 J | 0.10 J |
| Fluorene | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.42)] | 0.14 J | 0.062 J | ND(0.41) | ND(0.37) | ND(0.39) |
| Indeno(1,2,3-cd)pyrene | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.42)] | 0.77 | 0.20 J | ND(0.41) | ND(0.37) | ND(0.39) |
| Naphthalene | | ND(0.37) | ND(0.36) | ND(0.38) [ND(0.38)] | ND(0.40) | ND(0.40) | ND(0.41) | ND(0.37) | ND(0.39) |
| Phenanthrene | | ND(0.37) | ND(0.36) | ND(0.38) [0.11 J] | 1.5 | 0.46 | ND(0.41) | ND(0.37) | 0.051 J |
| Pyrene | | ND(0.37) | ND(0.36) | ND(0.38) [0.12 J] | 2.0 | 0.67 | ND(0.41) | ND(0.37) | 0.10 J |

(See notes on page 5)

**TABLE 3**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL SEMIVOLATILE ORGANICS DATA**
(Concentrations are presented in dry weight parts per million, ppm)

| Parameter | Sample ID: | ASB-31 | ASB-32 | ASB-33 | ASB-34 | A-17 | A-20 | A-24 |
|---|---|---|---|---|---|---|---|---|
| | Sample Depth (feet): | 2 - 4 | 6 - 8 | 0 - 2 | 4 - 6 | 4 - 6 | 4 - 6 | 8 - 10 |
| | Date Collected: | 02/18/98 | 02/18/98 | 02/18/98 | 02/18/98 | 04/23/99 | 04/22/99 | 04/22/99 |
| **Semivolatile Organics** | | | | | | | | |
| 1,2,4,5-Tetrachlorobenzene | | 0.018 J | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| 1,2,4-Trichlorobenzene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| 1,4-Dichlorobenzene | | 0.15 J | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| 2-Methylnaphthalene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Acenaphthene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Acenaphthylene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Anthracene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Benzo(a)anthracene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Benzo(a)pyrene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Benzo(b)fluoranthene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Benzo(g,h,i)perylene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Benzo(k)fluoranthene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Bis(2-ethylhexyl)phthalate | | ND(0.37) | ND(0.41) | 0.13 J | 0.27 J | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Chrysene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Di-n-butylphthalate | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Dibenz(a,h)anthracene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Dibenzofuran | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Fluoranthene | | ND(0.37) | ND(0.41) | 0.046 J | 0.11 J | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Fluorene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Indeno(1,2,3-cd)pyrene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Naphthalene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Phenanthrene | | ND(0.37) | ND(0.41) | ND(0.42) | ND(0.56) | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |
| Pyrene | | ND(0.37) | ND(0.41) | ND(0.42) | 0.099 J | ND(0.40) [ND(0.41)] | ND(0.40) | ND(0.37) |

(See notes on page 5)

**TABLE 3**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL SEMIVOLATILE ORGANICS DATA**
(Concentrations are presented in dry weight parts per million, ppm)

Notes:

1. Sample depth elevations are relative to the ground surface prior to installation of the surface cover.
2. Samples were analyzed for Appendix IX+3 semivolatile organic compounds; only those constituents detected in at least one sample are presented.
3. ND (0.36) - Compound was not detected. The value in parentheses is the associated quantitation limit.
4. J - Indicates an estimated value less than the CLP-required quantitation limit.
5. B- Indicates the compound was also detected in the associated method blank.
6. Duplicate results are presented in brackets.

**TABLE 4**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PESTICIDE/HERBICIDE DATA**
(Concentrations are presented in dry weight parts per million, ppm)

| Parameter | Sample ID: | K-16 | K-17 | K-18 | K-19 | K-20 | ASB-3 | ASB-11 | ASB-19 |
|---|---|---|---|---|---|---|---|---|---|
| | Sample Depth (feet): | 0-1.5 | 0-1.5 | 0-1.5 | 0-1.5 | 0-1.5 | 3 - 5 | 3 - 5 | 0 - 2 |
| | Date Collected: | 7/90 | 7/90 | 7/90 | 7/90 | 7/90 | 04/23/97 | 06/12/97 | 04/22/97 |
| **Pesticides** | | | | | | | | | |
| 4,4'-DDE | | NA | NA | NA | NA | NA | ND(0.19) | ND(0.0020 | ND(2.1) |
| 4,4'-DDT | | NA | NA | NA | NA | NA | ND(0.19) | ND(0.0020 | ND(2.1) |
| Dieldrin | | NA | NA | NA | NA | NA | 0.23 | ND(0.0020 | 6.4 |
| 2,4,5-T | | ND(0.02) | 0.05[0.06] | 0.06 | ND(0.02) | ND(0.02) | ND(0.11) | ND(0.012 | ND(0.012) |
| 2,4,5-TP | | ND(0.02) | ND(0.05)[ND(0.02)] | 0.07 | ND(0.02) | ND(0.02) | ND(0.11) | ND(0.012 | ND(0.012) |

| Parameter | Sample ID: | SCH-1 | SCH-2 | SCH-3 | SCH-4 | AS-98-129 | AS-98-130 | AS-98-132 | AS-98-133 |
|---|---|---|---|---|---|---|---|---|---|
| | Sample Depth (feet): | 8 - 10 | 6 - 8 | 2 - 4 | 8 - 10 | 0 - 0.5 | 0 - 0.5 | 0 - 0.5 | 0 - 0.5 |
| | Date Collected: | 04/28/97 | 04/29/97 | 04/28/97 | 04/30/97 | 02/17/98 | 02/17/98 | 02/17/98 | 02/17/98 |
| **Pesticides** | | | | | | | | | |
| 4,4'-DDE | | ND(0.0020) | ND(0.0019) | ND(0.0021) | ND(0.0020) | ND(0.0032) | 0.0045 | ND(0.0024) | ND(0.0020) |
| 4,4'-DDT | | ND(0.0020) | ND(0.0019) | 0.0023 | ND(0.0020) | ND(0.0032) | ND(0.0023) | ND(0.0024) | ND(0.0020) |
| Dieldrin | | ND(0.0020) | ND(0.0019) | ND(0.0021) | ND(0.0020) | ND(0.0032) | ND(0.0023) | ND(0.0024) | ND(0.0020) |
| 2,4,5-T | | ND(0.012) | ND(0.011) | ND(0.012) | ND(0.011) | ND(0.037) | ND(0.027) | ND(0.029) | ND(0.024) |
| 2,4,5-TP | | ND(0.012) | ND(0.011) | ND(0.012) | ND(0.011) | ND(0.037) | ND(0.027) | ND(0.029) | ND(0.024) |

| Parameter | Sample ID: | ASB-23 | ASB-24 | ASB-25 | ASB-26 | ASB-27 | ASB-28 | ASB-29 | ASB-30 |
|---|---|---|---|---|---|---|---|---|---|
| | Sample Depth (feet): | 5 - 7 | 5 - 7 | 5 - 7 | 2 - 4 | 2 - 4 | 6 - 8 | 2 - 4 | 0 - 2 |
| | Date Collected: | 02/19/98 | 02/19/98 | 02/19/98 | 02/17/98 | 02/17/98 | 02/17/98 | 02/18/98 | 02/18/98 |
| **Pesticides** | | | | | | | | | |
| 4,4'-DDE | | ND(0.0019) | ND(0.0018) | ND(0.0020) [ND(0.0022)] | ND(0.010) | ND(0.021) | ND(0.0021) | ND(0.0077) | ND(0.079) |
| 4,4'-DDT | | ND(0.0019) | ND(0.0018) | ND(0.0020) [ND(0.0022)] | ND(0.010) | ND(0.021) | ND(0.0021) | ND(0.0077) | ND(0.079) |
| Dieldrin | | ND(0.0019) | ND(0.0018) | ND(0.0020) J~ [0.0093 J~] | ND(0.010) | ND(0.021) | ND(0.0021) | ND(0.0077) | ND(0.079) |
| 2,4,5-T | | ND(0.023) | ND(0.022) | ND(0.023)[ND(0.0022)] | ND)0.024) | ND(0.024) | ND(0.025) | ND(0.023) | ND(0.023) |
| 2,4,5-TP | | ND(0.023) | ND(0.022) | ND(0.023)[ND(0.0022)] | ND)0.024) | ND(0.024) | ND(0.025) | ND(0.023) | ND(0.023) |

(See Notes on Page 2)

**TABLE 4**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL PESTICIDE/HERBICIDE DATA**
(Concentrations are presented in dry weight parts per million, ppm)

| Parameter | Sample ID: | ASB-31 | ASB-32 | ASB-33 | ASB-34 |
|---|---|---|---|---|---|
| | Sample Depth (feet): | 2 - 4 | 6 - 8 | 0 - 2 | 4 - 6 |
| | Date Collected: | 02/18/98 | 02/18/98 | 02/18/98 | 02/18/98 |
| **Pesticides** | | | | | |
| 4,4'-DDE | | ND(0.24) | ND(0.0021) | ND(0.0043) | ND(0.014) |
| 4,4'-DDT | | ND(0.24) | ND(0.0021) | ND(0.0043) | ND(0.014) |
| Dieldrin | | ND(0.24) | ND(0.0021) | ND(0.0043) | ND(0.014) |
| 2,4,5-T | | ND(0.022) | ND(0.025) | ND(0.025) | ND(0.034) |
| 2,4,5-TP | | ND(0.022) | ND(0.025) | ND(0.025) | ND(0.034) |

Notes:

1. Sample depth elevations are relative to the ground surface prior to installation of the surface cover.
2. Samples were analyzed for Appendix IX+3 pesticide and herbicide compounds; only those constituents detected in at least one sample are presented.
3. ND (0.36) - Compound was not detected. The value in parentheses is the associated quantitation limit.
4. J - Indicates an estimated value less than the CLP-required quantitation limit.
5. NA - Not analyzed for this constituent.
6. Duplicate results are presented in brackets.

**TABLE 5**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL POLYCHLORINATED DIBENZOFURANS AND POLYCHLORINATED DIBENZO-P-DIOXINS DATA**
(Results are presented in dry-weight parts per million, ppm)

| Sample ID: | K-16 | K-17 | K-18 | K-19 | K-20 | ASB-3 | ASB-11 |
|---|---|---|---|---|---|---|---|
| Sample Depth (feet): | 0-1.5 | 0-1.5 | 0-1.5 | 0-1.5 | 0-1.5 | 3 - 5 | 3 - 5 |
| Date Collected: | 7/90 | 7/90 | 7/90 | 7/90 | 7/90 | 04/23/97 | 06/12/97 |
| **Furans** | | | | | | | |
| 2,3,7,8-TCDF | NA | NA | NA | NA | NA | 0.000055 gD | 0.000003 g |
| TCDFs (total) | 0.0012 v | 0.0033 v[0.0023 v] | 0.0024 v | 0.0088 v | 0.00036 v | 0.00043 D | 0.000025 |
| 1,2,3,7,8-PeCDF | NA | NA | NA | NA | NA | 0.000028 J**D | ND(0.0000018) |
| 2,3,4,7,8-PeCDF | NA | NA | NA | NA | NA | 0.000035 J**D | ND(0.0000014) |
| PeCDFs (total) | 0.0023 v | 0.0051 v[0.0046 v] | 0.006 v | 0.0196 v | 0.00036 v | 0.00074 D | 0.000014 |
| 1,2,3,4,7,8-HxCDF | NA | NA | NA | NA | NA | 0.000072 | 0.0000037 J** |
| 1,2,3,6,7,8-HxCDF | NA | NA | NA | NA | NA | 0.000041 | ND(0.0000033) |
| 2,3,4,6,7,8-HxCDF | NA | NA | NA | NA | NA | 0.000019 | ND(0.0000015) |
| 1,2,3,7,8,9-HxCDF | NA | NA | NA | NA | NA | ND(0.0000026) | ND(0.00000012) |
| HxCDFs (total) | 0.0030 v | 0.0037 v[0.0058 v] | 0.0053 v | 0.016 v | 0.00025 v | 0.00075 | ND(0.000019) |
| 1,2,3,4,6,7,8-HpCDF | NA | NA | NA | NA | NA | 0.00010 | 0.0000058 J** |
| 1,2,3,4,7,8,9-HpCDF | NA | NA | NA | NA | NA | 0.000026 | ND(0.0000013) |
| HpCDFs (total) | NA | NA | NA | NA | NA | 0.00024 | 0.000012 |
| OCDF | NA | NA | NA | NA | NA | 0.000077 | 0.0000073 J** |
| Total Furans | 0.0065 | 0.012[0.013] | 0.014 | 0.044 | 0.00097 | 0.0022 | 0.000058 |
| **Dioxins** | | | | | | | |
| 2,3,7,8-TCDD | ND(0.000025) | ND(0.000088)[ND(0.000030)] | ND(0.000028) | ND(0.00011) | ND(0.000061) | ND(0.0000012) D | ND(0.00000034) |
| TCDDs (total) | ND(0.00022) | ND(0.00012)[ND(0.00019)] | ND(0.00010) | ND(0.00033) | ND(0.000069) | ND(0.0000030) D | ND(0.00000072) |
| 1,2,3,7,8-PeCDD | NA | NA | NA | NA | NA | ND(0.0000036) D | ND(0.00000093) |
| PeCDDs (total) | ND(0.000096) | ND(0.00023)[ND(0.00033] | ND(0.00027) | ND(0.00034) | ND(0.00012) | ND(0.0000080) D | ND(0.00000093) |
| 1,2,3,4,7,8-HxCDD | NA | NA | NA | NA | NA | ND(0.0000020) | ND(0.00000086) |
| 1,2,3,6,7,8-HxCDD | NA | NA | NA | NA | NA | 0.0000034 J** | ND(0.00000079) |
| 1,2,3,7,8,9-HxCDD | NA | NA | NA | NA | NA | ND(0.0000027) | ND(0.00000079) |
| HxCDDs (total) | ND(0.00013) | ND(0.00017)[ND(0.00017)] | ND(0.00061) | ND(0.00035) | ND(0.00011) | 0.000046 | ND(0.0000013) |
| 1,2,3,4,6,7,8-HpCDD | NA | NA | NA | NA | NA | 0.000016 | ND(0.0000014) |
| HpCDDs (total) | NA | NA | NA | NA | NA | 0.000038 | ND(0.0000025) |
| OCDD | NA | NA | NA | NA | NA | 0.00011 | 0.000011 J** |
| Total Dioxins | ND(0.00022) | ND(0.00023)[ND(0.00033)] | ND(0.00027) | ND(0.00035) | ND(0.00012) | 0.00019 | 0.000011 |
| **TOTAL TEQ (WHO TEFs)** | 1.6E-04 | 2.8E-04 [3.1E-04] | 3.5E-04 | 1.1E-03 | 2.0E-05 | 3.9E-05 | 7.3E-07 |

(See notes on page 6)

**TABLE 5**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL POLYCHLORINATED DIBENZOFURANS AND POLYCHLORINATED DIBENZO-P-DIOXINS DATA**
(Results are presented in dry-weight parts per million, ppm)

| Sample ID: | ASB-19 | SCH-1 | SCH-2 | SCH-3 | SCH-4 | AS-98-129 | AS-98-130 |
|---|---|---|---|---|---|---|---|
| Sample Depth (feet): | 0 - 2 | 8 - 10 | 6 - 8 | 2 - 4 | 8 - 10 | 0 - 0.5 | 0 - 0.5 |
| Date Collected: | 04/22/97 | 04/28/97 | 04/29/97 | 04/28/97 | 04/30/97 | 02/17/98 | 02/17/98 |
| **Furans** | | | | | | | |
| 2,3,7,8-TCDF | 0.000019 g | 0.00000057 gJ** | ND(0.00000012) | 0.0000016 g | ND(0.00000022) | 0.000024 | 0.0000024 g |
| TCDFs (total) | 0.00017 | 0.00000084 | ND(0.00000032) | 0.000013 | ND(0.00000022) | 0.00014 | 0.000012 |
| 1,2,3,7,8-PeCDF | 0.000016 | ND(0.00000078) | ND(0.00000027) | ND(0.00000053) | ND(0.00000031) | ND(0.0000046) | ND(0.0000012) |
| 2,3,4,7,8-PeCDF | 0.000048 | ND(0.00000078) | ND(0.00000027) | ND(0.00000063) | ND(0.00000032) | 0.0000062 J** | ND(0.0000012) |
| PeCDFs (total) | 0.00084 | ND(0.00000095) | ND(0.00000027) | 0.0000044 | ND(0.00000032) | 0.00011 | 0.000014 |
| 1,2,3,4,7,8-HxCDF | 0.0005 | ND(0.00000025) | ND(0.00000014) | ND(0.0000016) | ND(0.00000013) | 0.0000068 J** | ND(0.00000070) |
| 1,2,3,6,7,8-HxCDF | ND(0.000074) v | ND(0.00000023) | ND(0.00000014) | ND(0.00000098) | ND(0.00000013) | ND(0.0000037) | ND(0.00000064) |
| 2,3,4,6,7,8-HxCDF | 0.000048 | ND(0.00000041) | ND(0.00000032) | ND(0.00000065) | ND(0.00000029) | ND(0.0000042) | ND(0.00000076) |
| 1,2,3,7,8,9-HxCDF | 0.0000054 J** | ND(0.00000031) | ND(0.00000015) | ND(0.00000035) | ND(0.00000013) | ND(0.0000025) | ND(0.00000082) |
| HxCDFs (total) | 0.0016 | ND(0.00000041) | ND(0.00000032) | ND(0.0000027) | ND(0.00000029) | 0.000076 | 0.0000092 |
| 1,2,3,4,6,7,8-HpCDF | 0.00048 | ND(0.00000026) | ND(0.00000047) | ND(0.0000024) | ND(0.00000014) | 0.000016 | ND(0.0000030) |
| 1,2,3,4,7,8,9-HpCDF | 0.00042 | ND(0.00000036) | ND(0.00000060) | ND(0.00000035) | ND(0.00000016) | ND(0.0000016) | ND(0.00000028) |
| HpCDFs (total) | 0.0017 | ND(0.00000036) | ND(0.00000060) | ND(0.0000024) | ND(0.00000016) | 0.000030 | 0.0000041 |
| OCDF | 0.0018 | ND(0.0000018) | ND(0.00000041) | ND(0.0000018) | ND(0.00000055) | 0.000016 J** | 0.000010 J** |
| Total Furans | 0.0061 | 0.00000084 | ND(0.00000060) | 0.000017 | ND(0.00000055) | 0.00037 | 0.000049 |
| **Dioxins** | | | | | | | |
| 2,3,7,8-TCDD | 0.0000016 | ND(0.00000042) | ND(0.00000029) | ND(0.00000041) | ND(0.00000015) | ND(0.00000083) | ND(0.00000038) |
| TCDDs (total) | 0.000056 | ND(0.00000042) | ND(0.00000029) | ND(0.00000041) | ND(0.00000015) | 0.0000029 | ND(0.00000037) |
| 1,2,3,7,8-PeCDD | 0.000020 | ND(0.00000055) | ND(0.00000041) | ND(0.00000050) | ND(0.00000031) | ND(0.0000018) | ND(0.00000093) |
| PeCDDs (total) | 0.00010 | ND(0.00000055) | ND(0.00000041) | ND(0.00000050) | ND(0.00000031) | ND(0.0000027) | ND(0.00000093) |
| 1,2,3,4,7,8-HxCDD | 0.000029 | ND(0.00000053) | ND(0.00000024) | ND(0.00000061) | ND(0.00000024) | ND(0.0000025) | ND(0.0000011) |
| 1,2,3,6,7,8-HxCDD | 0.000025 | ND(0.00000041) | ND(0.00000025) | ND(0.00000047) | ND(0.00000024) | ND(0.0000025) | ND(0.00000097) |
| 1,2,3,7,8,9-HxCDD | 0.000020 | ND(0.00000044) | ND(0.00000024) | ND(0.00000051) | ND(0.00000023) | ND(0.0000027) | ND(0.0000010) |
| HxCDDs (total) | 0.00033 | ND(0.00000053) | ND(0.00000025) | ND(0.00000061) | ND(0.00000024) | 0.000020 | ND(0.0000021) |
| 1,2,3,4,6,7,8-HpCDD | 0.00012 | ND(0.00000047) | ND(0.00000034) | ND(0.00000079) | ND(0.00000031) | 0.000027 | 0.0000068 |
| HpCDDs (total) | 0.00025 | ND(0.00000047) | ND(0.00000034) | ND(0.00000079) | ND(0.00000031) | 0.000045 | 0.000015 |
| OCDD | 0.00031 | ND(0.0000025) | ND(0.0000020) | ND(0.0000031) | ND(0.0000017) | 0.00017 | 0.000079 |
| Total Dioxins | 0.0010 | ND(0.0000025) | ND(0.0000020) | ND(0.0000031) | ND(0.0000017) | 0.00024 | 0.000094 |
| **TOTAL TEQ (WHO TEFs)** | 1.2E-04 | 5.7E-08 | ND(0.0000020) | 1.6E-07 | ND(0.0000017) | 6.6E-06 | 3.2E-07 |

(See notes on page 6)

**TABLE 5**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL POLYCHLORINATED DIBENZOFURANS AND POLYCHLORINATED DIBENZO-P-DIOXINS DATA**
(Results are presented in dry-weight parts per million, ppm)

| Sample ID: | AS-98-132 | AS-98-133 | ASB-23 | ASB-24 | ASB-25 | ASB-26 | ASB-27 |
|---|---|---|---|---|---|---|---|
| Sample Depth (feet): | 0 - 0.5 | 0 - 0.5 | 5 - 7 | 5 - 7 | 5 - 7 | 2 - 4 | 2 - 4 |
| Date Collected: | 02/17/98 | 02/17/98 | 02/19/98 | 02/19/98 | 02/19/98 | 02/17/98 | 02/17/98 |
| **Furans** | | | | | | | |
| 2,3,7,8-TCDF | 0.0000040 g | 0.0000028 g | ND(0.00000026) | ND(0.00000036) | 0.0000017 g [0.0000019 g] | 0.0000048 | 0.000013 g |
| TCDFs (total) | 0.0000074 | 0.000012 | ND(0.00000026) | ND(0.00000041) | 0.000011 J~ [0.000021 J~] | 0.000051 | 0.00010 |
| 1,2,3,7,8-PeCDF | ND(0.0000015) | ND(0.00000045) | ND(0.00000069) | ND(0.00000022) | ND(0.00000045) [ND(0.00000085)] | ND(0.0000012) | ND(0.0000016) |
| 2,3,4,7,8-PeCDF | ND(0.0000015) | ND(0.00000049) | ND(0.00000066) | ND(0.00000023) | ND(0.00000038) [ND(0.000012)] | ND(0.0000029) | ND(0.0000017) |
| PeCDFs (total) | 0.000015 | 0.0000061 | ND(0.00000069) | ND(0.00000090) | ND(0.0000020) J~ [0.000032 J~] | 0.000058 | 0.000026 |
| 1,2,3,4,7,8-HxCDF | ND(0.0000032) | ND(0.0000014) | ND(0.00000046) | ND(0.00000041) | ND(0.00000065) [0.0000039 J**] | 0.0000088 | ND(0.0000018) |
| 1,2,3,6,7,8-HxCDF | ND(0.0000033) | ND(0.00000066) | ND(0.00000047) | ND(0.00000042) | ND(0.00000068) [0.0000031 J**] | 0.0000039 J** | ND(0.00000085) |
| 2,3,4,6,7,8-HxCDF | ND(0.0000035) | ND(0.00000065) | ND(0.00000049) | ND(0.00000044) | ND(0.00000070) J~ [0.0000027 J~] | ND(0.0000030) | ND(0.00000093) |
| 1,2,3,7,8,9-HxCDF | ND(0.0000016) | ND(0.00000014) | ND(0.00000056) | ND(0.00000051) | ND(0.00000082) [0.00000089] | ND(0.00000059) | ND(0.00000015) |
| HxCDFs (total) | 0.0000060 | 0.0000034 | ND(0.00000072) | ND(0.0000010) | ND(0.0000010) J~ [0.000067 J~] | 0.000081 | 0.0000096 |
| 1,2,3,4,6,7,8-HpCDF | ND(0.0000045) | ND(0.0000018) | ND(0.00000047) | ND(0.00000033) | ND(0.00000074) [ND(0.0000061)] | 0.000012 | ND(0.0000022) |
| 1,2,3,4,7,8,9-HpCDF | ND(0.00000046) | ND(0.00000050) | ND(0.00000055) | ND(0.000000092) | ND(0.00000022) [ND(0.0000015)] | 0.0000044 J** | ND(0.00000037) |
| HpCDFs (total) | 0.0000072 | ND(0.0000018) | ND(0.00000055) | ND(0.00000033) | ND(0.00000074) J~ [0.000016 J~] | 0.000034 | ND(0.0000022) |
| OCDF | ND(0.0000085) | ND(0.0000019) | ND(0.0000017) | ND(0.0000016) | ND(0.0000031) [0.0000064 J**] | 0.000038 | 0.0000041 |
| Total Furans | 0.000036 | 0.000022 | ND(0.0000017) | ND(0.0000016) | 0.000011 [0.00014] | 0.00026 | 0.00014 |
| **Dioxins** | | | | | | | |
| 2,3,7,8-TCDD | ND(0.00000048) | ND(0.00000042) | ND(0.00000036) | ND(0.00000023) | ND(0.00000036) [ND(0.00000046)] | ND(0.00000087) | ND(0.00000026) |
| TCDDs (total) | ND(0.00000048) | ND(0.00000042) | ND(0.00000036) | ND(0.00000023) | ND(0.00000036) [ND(0.00000046)] | 0.00000093 | ND(0.00000059) |
| 1,2,3,7,8-PeCDD | ND(0.0000021) | ND(0.00000029) | ND(0.00000068) | ND(0.00000062) | ND(0.00000064) [ND(0.0000013)] | ND(0.0000013) | ND(0.00000036) |
| PeCDDs (total) | ND(0.0000021) | ND(0.00000097) | ND(0.00000068) | ND(0.00000062) | ND(0.00000064) [ND(0.0000013)] | ND(0.0000031) | ND(0.0000018) |
| 1,2,3,4,7,8-HxCDD | ND(0.0000019) | ND(0.00000050) | ND(0.00000049) | ND(0.00000048) | ND(0.00000061) [ND(0.0000010)] | ND(0.00000069) | ND(0.00000074) |
| 1,2,3,6,7,8-HxCDD | ND(0.0000020) | ND(0.00000063) | ND(0.00000051) | ND(0.00000049) | ND(0.00000064) [ND(0.0000011)] | ND(0.0000013) | ND(0.00000062) |
| 1,2,3,7,8,9-HxCDD | ND(0.0000019) | ND(0.00000050) | ND(0.00000049) | ND(0.00000047) | ND(0.00000060) [ND(0.0000010)] | ND(0.0000015) | ND(0.00000065) |
| HxCDDs (total) | ND(0.0000020) | ND(0.0000016) | ND(0.00000051) | ND(0.00000049) | ND(0.00000064) [ND(0.0000011)] | 0.0000064 | ND(0.00000074) |
| 1,2,3,4,6,7,8-HpCDD | 0.000013 | 0.0000031 J** | ND(0.00000036) | ND(0.00000049) | ND(0.00000054) [ND(0.0000021)] | 0.0000050 J** | ND(0.00000070) |
| HpCDDs (total) | 0.000023 | 0.0000031 | ND(0.00000036) | ND(0.00000049) | ND(0.00000054) [ND(0.0000021)] | 0.000011 | ND(0.00000070) |
| OCDD | 0.000096 | 0.000020 | ND(0.0000017) | ND(0.0000028) | ND(0.0000043) J~ [0.000013 J~] | 0.000033 | ND(0.0000031) |
| Total Dioxins | 0.00012 | 0.000023 | ND(0.0000017) | ND(0.0000028) | ND(0.0000043) [0.000013] | 0.000051 | ND(0.0000031) |
| **TOTAL TEQ (WHO TEFs)** | 5.4E-07 | 3.1E-07 | ND(0.0000017) | ND(0.0000028) | 1.7E-07 [9.5E-06] | 2.0E-06 | 1.3E-06 |

(See notes on page 6)

**TABLE 5**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL POLYCHLORINATED DIBENZOFURANS AND POLYCHLORINATED DIBENZO-P-DIOXINS DATA**
(Results are presented in dry-weight parts per million, ppm)

| Sample ID: | ASB-28 | ASB-29 | ASB-30 | ASB-31 | ASB-32 | ASB-33 | ASB-34 |
|---|---|---|---|---|---|---|---|
| Sample Depth (feet): | 6 - 8 | 2 - 4 | 0 - 2 | 2 - 4 | 6 - 8 | 0 - 2 | 4 - 6 |
| Date Collected: | 02/17/98 | 02/18/98 | 02/18/98 | 02/18/98 | 02/18/98 | 02/18/98 | 02/18/98 |
| **Furans** | | | | | | | |
| 2,3,7,8-TCDF | 0.00000094 J** | ND(0.0000013) J** | ND(0.000012) J** | ND(0.000017) J** | ND(0.00000029) | ND(0.00000063) J** | ND(0.0000058) J** |
| TCDFs (total) | 0.0000024 | 0.0000041 | 0.000071 | 0.00052 | ND(0.0000011) | 0.00000063 | 0.000056 |
| 1,2,3,7,8-PeCDF | ND(0.00000057) | ND(0.0000012) | ND(0.0000026) | 0.000018 | ND(0.00000050) | ND(0.00000063) | ND(0.0000011) |
| 2,3,4,7,8-PeCDF | ND(0.00000057) | ND(0.00000080) | 0.0000059 J** | 0.000053 | ND(0.00000051) | ND(0.00000066) | ND(0.0000017) |
| PeCDFs (total) | ND(0.00000074) | 0.0000081 | 0.000085 | 0.0069 | ND(0.0000012) | ND(0.0000022) | 0.000052 |
| 1,2,3,4,7,8-HxCDF | ND(0.00000065) | ND(0.0000026) | 0.000013 | 0.00064 | ND(0.00000064) | ND(0.00000091) | 0.0000097 |
| 1,2,3,6,7,8-HxCDF | ND(0.00000061) | ND(0.0000020) | 0.0000063 J** | ND(0.00092) J** | ND(0.00000067) | ND(0.00000095) | 0.0000093 J** |
| 2,3,4,6,7,8-HxCDF | ND(0.00000066) | ND(0.00000059) | 0.0000035 J** | 0.0012 | ND(0.00000069) | ND(0.00000099) | ND(0.0000026) |
| 1,2,3,7,8,9-HxCDF | ND(0.00000077) | ND(0.00000057) | ND(0.00000047) | 0.0000049 J** | ND(0.00000080) | ND(0.0000026) | ND(0.0000014) |
| HxCDFs (total) | ND(0.00000077) | 0.0000094 | 0.000091 | 0.034 | ND(0.00000080) | ND(0.00000091) | 0.000070 |
| 1,2,3,4,6,7,8-HpCDF | ND(0.00000056) | 0.0000042 J** | 0.000020 | 0.0084 | ND(0.00000050) | ND(0.0000024) | 0.000018 |
| 1,2,3,4,7,8,9-HpCDF | ND(0.00000027) | ND(0.0000019) | 0.0000058 J** | 0.00034 | ND(0.00000060) | ND(0.00000043) | 0.0000058 J** |
| HpCDFs (total) | ND(0.00000078) | 0.000010 | 0.000047 | 0.019 | ND(0.00000060) | ND(0.0000024) | 0.000045 |
| OCDF | ND(0.0000035) | 0.000015 | 0.000045 | 0.0024 | ND(0.0000021) | ND(0.0000045) | 0.000043 |
| Total Furans | 0.0000024 | 0.000047 | 0.00034 | 0.063 | ND(0.0000021) | 0.00000063 | 0.00027 |
| **Dioxins** | | | | | | | |
| 2,3,7,8-TCDD | ND(0.00000039) | ND(0.00000040) | ND(0.00000051) | 0.0000033 | ND(0.00000030) | ND(0.00000029) | ND(0.00000059) |
| TCDDs (total) | ND(0.00000039) | ND(0.00000040) | 0.0000039 | 0.00014 | ND(0.00000030) | ND(0.00000029) | 0.0000010 |
| 1,2,3,7,8-PeCDD | ND(0.00000083) | ND(0.00000052) | ND(0.0000012) | 0.000067 | ND(0.00000039) | ND(0.00000033) | ND(0.0000010) |
| PeCDDs (total) | ND(0.00000083) | ND(0.0000011) | ND(0.0000060) | 0.00037 | ND(0.00000098) | ND(0.00000089) | ND(0.0000027) |
| 1,2,3,4,7,8-HxCDD | ND(0.00000078) | ND(0.00000044) | ND(0.00000078) | 0.000070 | ND(0.00000064) | ND(0.00000075) | ND(0.00000081) |
| 1,2,3,6,7,8-HxCDD | ND(0.00000066) | ND(0.00000045) | ND(0.0000023) | 0.000083 | ND(0.00000066) | ND(0.00000076) | ND(0.00000084) |
| 1,2,3,7,8,9-HxCDD | ND(0.00000069) | ND(0.00000047) | ND(0.0000019) | 0.00011 | ND(0.00000063) | ND(0.00000074) | ND(0.00000079) |
| HxCDDs (total) | ND(0.00000078) | ND(0.0000012) | 0.0000083 | 0.0016 | ND(0.00000066) | ND(0.00000076) | ND(0.0000030) |
| 1,2,3,4,6,7,8-HpCDD | ND(0.0000039) | ND(0.0000015) | 0.000015 | 0.00026 | ND(0.00000040) | ND(0.0000017) | ND(0.0000031) |
| HpCDDs (total) | ND(0.00000043) | ND(0.0000015) | 0.000029 | 0.00076 | ND(0.00000040) | ND(0.0000017) | ND(0.0000031) |
| OCDD | ND(0.0000039) | 0.0000077 J** | 0.00010 | 0.00047 | ND(0.00000069) | 0.000019 | 0.000015 J** |
| Total Dioxins | ND(0.0000039) | 0.0000077 | 0.00014 | 0.0033 | ND(0.0000021) | 0.000019 | 0.000016 |
| **TOTAL TEQ (WHO TEFs)** | 9.4E-08 | 4.4E-08 | 5.7E-06 | 4.0E-04 | ND(0.0000021) | 1.9E-09 | 2.1E-06 |

(See notes on page 6)

**TABLE 5**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL POLYCHLORINATED DIBENZOFURANS AND POLYCHLORINATED DIBENZO-P-DIOXINS DATA**
(Results are presented in dry-weight parts per million, ppm)

| Sample ID: | A-17 | A-20 | A-24 |
|---|---|---|---|
| Sample Depth (feet): | 4 - 6 | 4 - 6 | 8 - 10 |
| Date Collected: | 04/23/99 | 04/22/99 | 04/22/99 |
| **Furans** | | | |
| 2,3,7,8-TCDF | 0.00000089 J~ [ND(0.00000016) J~] | 0.0000038 | ND(0.00000011) |
| TCDFs (total) | 0.0000077 J~ [ND(0.00000053) J~] | 0.000033 | ND(0.00000011) |
| 1,2,3,7,8-PeCDF | ND(0.00000032) [ND(0.00000017)] | ND(0.0000011) | ND(0.00000028) |
| 2,3,4,7,8-PeCDF | ND(0.00000044) [ND(0.00000017)] | ND(0.0000013) | ND(0.00000029) |
| PeCDFs (total) | 0.0000082 J~ [ND(0.00000031) J~] | 0.000021 | ND(0.00000029) |
| 1,2,3,4,7,8-HxCDF | ND(0.0000012) [ND(0.00000014)] | ND(0.0000027) | ND(0.000000090) |
| 1,2,3,6,7,8-HxCDF | ND(0.00000024) [ND(0.000000099)] | ND(0.00000084) | ND(0.000000079) |
| 2,3,4,6,7,8-HxCDF | ND(0.00000029) [ND(0.000000062)] | ND(0.00000062) | ND(0.000000056) |
| 1,2,3,7,8,9-HxCDF | ND(0.000000036) [ND(0.000000074)] | ND(0.000000072) | ND(0.000000079) |
| HxCDFs (total) | 0.0000034 J~ [ND(0.00000015) J~] | 0.000012 | ND(0.000000090) |
| 1,2,3,4,6,7,8-HpCDF | ND(0.0000018) [ND(0.00000020)] | 0.0000038 | ND(0.00000018) |
| 1,2,3,4,7,8,9-HpCDF | ND(0.00000084) [ND(0.000000099)] | ND(0.0000013) | ND(0.000000079) |
| HpCDFs (total) | ND(0.0000025) [ND(0.00000042)] | 0.0000081 | ND(0.00000043) |
| OCDF | ND(0.0000039) [ND(0.00000088)] | ND(0.0000070) | ND(0.00000054) |
| Total Furans | 0.000019 [ND(0.00000088)] | 0.000074 | ND(0.00000054) |
| **Dioxins** | | | |
| 2,3,7,8-TCDD | ND(0.000000060) [ND(0.000000062)] | ND(0.000000072) | ND(0.00000011) |
| TCDDs (total) | ND(0.00000019) [ND(0.000000062)] | 0.00000062 | ND(0.00000011) |
| 1,2,3,7,8-PeCDD | ND(0.00000016) [ND(0.00000017)] | ND(0.00000020) | ND(0.00000016) |
| PeCDDs (total) | ND(0.00000047) [ND(0.00000017)] | ND(0.0000011) | ND(0.00000016) |
| 1,2,3,4,7,8-HxCDD | ND(0.000000048) [ND(0.000000087)] | ND(0.00000017) | ND(0.00000014) |
| 1,2,3,6,7,8-HxCDD | ND(0.00000012) [ND(0.000000087)] | ND(0.00000023) | ND(0.00000014) |
| 1,2,3,7,8,9-HxCDD | ND(0.00000011) [ND(0.000000074)] | ND(0.00000026) | ND(0.00000012) |
| HxCDDs (total) | ND(0.00000056) [ND(0.000000087)] | ND(0.0000012) | ND(0.00000014) |
| 1,2,3,4,6,7,8-HpCDD | ND(0.00000074) [ND(0.00000082)] | ND(0.0000019) | ND(0.00000049) |
| HpCDDs (total) | ND(0.00000074) [ND(0.00000082)] | ND(0.0000019) | ND(0.00000049) |
| OCDD | ND(0.0000043) [ND(0.0000075)] | ND(0.0000069) | ND(0.0000040) |
| Total Dioxins | ND(0.0000043) [ND(0.0000075)] | 0.00000062 | ND(0.0000040) |
| **TOTAL TEQ (WHO TEFs)** | 0.000000089 [ND(0.0000075)] | 0.00000042 | ND(0.0000040) |

(See notes on page 6)

**TABLE 5**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL POLYCHLORINATED DIBENZOFURANS AND POLYCHLORINATED DIBENZO-P-DIOXINS DATA**
(Results are presented in dry-weight parts per million, ppm)

Notes:

1. Sample depth elevations are relative to the ground surface prior to installation of the surface cover.
2. Samples were analyzed for 2,3,7,8-substituted polychlorinated dibenzo-p-dioxins (dioxins) and polychlorinated dibenzofurans (furans).
3. ND (0.0000026) - Compound was not detected. The value in parentheses is the associated quantitation limit.
4. J** - Indicates an estimated value lower than the calibration limit, but above the target detection limit.
5. J~ - Indicates the reported value is estimated due to data validation qualification.
6. D - Sample concentration was determined from a secondary dilution.
7. g - 2,3,7,8-TCDF results have been confirmed on a DB-225 column.
8. v - Elevated detection limit due to chemical interference.
9. NA - Not analyzed for this constituent.
10. J~ - Indicates the reported value is estimated due to data validation qualification.
11. Duplicate results are presented in brackets.
12. TEQ values were calculated using Toxic Equivalence Factors (TEFs) derived by the World Health Organization in "Toxic Equivalence Factors (TEFs) for PCBs, PCDDs, PCDFs for Humans and Wildlife", and published by Van den Berg, et. al., in Environmental Health Perspectives 106(2), December 1998.
13. For samples K-16 through K-20, complete congener information was not available. TEQs for these samples were estimated using guidance from the USEPA document "1989 Update to the Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-dioxins and Dibenzofurans (CDDs and CDFs)". The proportion of total homolog concentration estimated to be 2,3,7,8-substituted congeners was based on assuming an equal distribution of all congeners within that group.

**TABLE 6**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL INORGANICS DATA**

(Results are presented in dry-weightparts per million, ppm)

| Parameter | Sample ID:<br>Sample Depth (feet):<br>Date Collected: | K-16<br>0-1.5<br>7/90 | K-17<br>0-1.5<br>7/90 | K-18<br>0-1.5<br>7/90 | K-19<br>0-1.5<br>7/90 | K-20<br>0-1.5<br>7/90 | ASB-3<br>3 - 5<br>04/23/97 | ASB-11<br>3 - 5<br>06/12/97 |
|---|---|---|---|---|---|---|---|---|
| **Inorganics** | | | | | | | | |
| Antimony | | ND(3.0) | ND(3.0)[ND(3.0)] | ND(3.0) | ND(3.0) | ND(3.0) | ND(2.2) | ND(7.2) |
| Arsenic | | 7 | 13[9] | 17 | 3 | 6 | 5.3 | 3.4 |
| Barium | | 27.3 | 64.8[39.1] | 43.9 | 25.4 | 24.9 | 52.0 | 25.7 |
| Beryllium | | 0.3 | 0.3[0.3] | 0.5 | 0.3 | 0.3 | 0.22 J* | 0.20 J* |
| Cadmium | | ND(0.5) | 0.7[ND(0.5)] | ND(0.5) | ND(0.5) | ND(0.5) | 0.24 J* | ND(0.60) |
| Chromium | | 6 | 8[10] | 10 | 7 | 7 | 7.8 | 7.0 |
| Cobalt | | 6 | 10[8] | 8 | 6 | 6 | 6.4 | 6.5 |
| Copper | | 10 | 11[13] | 12 | 10 | 10 | 33.0 | 10.4 |
| Lead | | 17 | 11[13] | 14 | 12 | 7 | 60.1 | 8.1 |
| Mercury | | ND(0.1) | ND(0.1)[ND(0.1)] | ND(0.1) | ND(0.1) | ND(0.1) | 0.13 | 0.016 J* |
| Nickel | | 9 | 12[12] | 14 | 10 | 9 | 13.1 | 10.1 |
| Selenium | | ND(6.0) | ND(6.0)[ND(6.0)] | ND(6.0) | ND(6.0) | ND(6.0) | 0.37 J* | ND(0.60) |
| Silver | | ND(0.5) | ND(0.5)[ND(0.5)] | ND(0.5) | ND(0.5) | ND(0.5) | 0.47 J* | ND(1.2) |
| Sulfide | | ND(8.0) | ND(0.8)[ND(0.8)] | ND(0.8) | ND(0.8) | ND(0.8) | ND(218) | ND(240) |
| Thallium | | ND(3.0) | ND(3.0)[ND(3.0)] | 17 | ND(3.0) | ND(3.0) | ND(0.40) | 1.0J* |
| Tin | | ND(2.0) | 4[ND(2.0)] | 5 | ND(2.0) | ND(2.0) | ND(1.9) | ND(12.0) |
| Vanadium | | 8 | 11[12] | 13 | 8 | 10 | 6.3 | 7.8 |
| Zinc | | 45.6 | 53.4[57.1] | 64.3 | 47.5 | 43.4 | 90.1 | 44.1 |

(See notes on page 4)

**TABLE 6**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL INORGANICS DATA**

(Results are presented in dry-weightparts per million, ppm)

| Parameter | Sample ID:<br>Sample Depth (feet):<br>Date Collected: | ASB-19<br>0 - 2<br>04/22/97 | SCH-1<br>8 - 10<br>04/28/97 | SCH-2<br>6 - 8<br>04/29/97 | SCH-3<br>2 - 4<br>04/28/97 | SCH-4<br>8 - 10<br>04/30/97 | AS-98-129<br>0 - 0.5<br>02/17/98 | AS-98-130<br>0 - 0.5<br>02/17/98 |
|---|---|---|---|---|---|---|---|---|
| **Inorganics** | | | | | | | | |
| Antimony | | ND(2.5) | ND(2.4) | 2.9 J* | ND(2.5) | ND(2.3) | ND(11.2) | ND(8.1) |
| Arsenic | | 6.7 * | 6.3 | 6.1 | 5.5 | 4.1 | 9.7 | 5.9 |
| Barium | | 35.1 | 51.7 | 39.7 | 24.8 | 36.2 | 59.0 | 44.6 |
| Beryllium | | 0.25 J* | 0.39 J* | 0.33 J* | 0.33 J* | 0.34 J* | 0.46 J* | 0.38 J* |
| Cadmium | | 0.30 J* | 0.20 J* | 0.15 J* | 0.050 J* | 0.030 J* | ND(0.93) | ND(0.67) |
| Chromium | | 7.7 | 13.3 | 11.7 | 10.5 | 8.5 | 12.7 | 11.6 |
| Cobalt | | 10.1 | 11.7 | 12.9 | 8.8 | 8.1 | 12.1 | 10.6 |
| Copper | | 16.4 * | 21.4 | 18.6 | 12.4 | 14.1 | 25.1 | 18.8 |
| Lead | | 15.8 | 9.3 | 8.8 | 10.0 | 7.3 | 55.8 | 16.3 |
| Mercury | | 0.040 | ND(0.040) | ND(0.040) | ND(0.040) | 0.040 | 0.17 J* | 0.056 J* |
| Nickel | | 13.8 | 21.6 | 21.2 | 16.4 | 15.0 | 18.5 | 16.8 |
| Selenium | | ND(0.32) | ND(0.30) | ND(0.29) | 0.43 J* | 0.32 J* | 1.6 | 0.84 |
| Silver | | ND(0.36) | 0.49 J* | 0.41 J* | 0.67 J* | 0.69 J* | ND(1.9) | ND(1.3) |
| Sulfide | | ND(243) | ND(230) | ND(225) | ND(246) | ND(230) | 373 | ND(269) |
| Thallium | | ND(0.45) | ND(0.43) | ND(0.42) | ND(0.45) | ND(0.43) | ND(1.9) | ND(1.3) |
| Tin | | ND(2.1) | ND(2.0) | ND(2.0) | ND(2.1) | ND(2.0) | ND(18.6) | ND(13.5) |
| Vanadium | | 9.1 | 14.1 | 13.1 | 12.2 | 10.3 | 18.5 | 15.4 |
| Zinc | | 55.3 J* | 71.1 | 72.3 | 52.6 | 56.6 | 101 | 64.9 |

(See notes on page 4)

**TABLE 6**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL INORGANICS DATA**

(Results are presented in dry-weightparts per million, ppm)

| Parameter | Sample ID:<br>Sample Depth (feet):<br>Date Collected: | AS-98-132<br>0 - 0.5<br>02/17/98 | AS-98-133<br>0 - 0.5<br>02/17/98 | ASB-23<br>5 - 7<br>02/19/98 | ASB-24<br>5 - 7<br>02/19/98 | ASB-25<br>5 - 7<br>02/19/98 | ASB-26<br>2 - 4<br>02/17/98 | ASB-27<br>2 - 4<br>02/17/98 |
|---|---|---|---|---|---|---|---|---|
| **Inorganics** | | | | | | | | |
| Antimony | | ND(8.6) | ND(7.1) | ND(6.8) J~ | ND(6.5) J~ | ND(6.9 J~[ND(7.7) J~] | ND(7.3) J~ | ND(7.3) J~ |
| Arsenic | | 5.9 | 5.6 | 8.0 | 5.5 | 5.0 [5.9] | 3.6 | 4.9 |
| Barium | | 39.4 | 28.9 | 29.9 | 19.0 J* | 49.0 [34.9] | 19.9 J* | 27.4 |
| Beryllium | | 0.34 J* | 0.28 J* | 0.21 J* | 0.18 J* | 0.35 J* [0.36 J*] | 0.17 J* | 0.26 J* |
| Cadmium | | ND(0.72) | ND(0.59) | ND(0.57) | ND(0.54) | ND(0.58) [ND(0.64)] | ND(0.61) | ND(0.61) |
| Chromium | | 10.9 | 7.0 | 6.0 | 6.7 | 8.9 [10.8] | 6.7 | 7.5 |
| Cobalt | | 10.6 | 8.5 | 14.4 | 10.8 | 9.3 [10.2] | 7.6 | 11.6 |
| Copper | | 17.9 | 16.2 | 19.5 | 12.9 | 15.2 [19.2] | 13.7 | 16.8 |
| Lead | | 16.9 | 14.3 | 12.6 | 12.6 | 9.7 [9.1] | 16.3 | 10.7 |
| Mercury | | 0.043 J* | 0.022 J* | ND(0.033) | ND(0.043) | ND(0.036) [ND(0.052)] | 0.015 J* | 0.011 J* |
| Nickel | | 15.4 | 13.9 | 17.1 | 14.3 | 12.2 [16.8] | 11.7 | 17.8 |
| Selenium | | 0.82 | ND(0.59) | 0.40 J* | ND(0.54) | 1.5 [0.99] | 0.82 | 0.49 J* |
| Silver | | ND(1.4) | ND(1.2) | ND(1.1) | ND(1.1) | ND(1.2) [ND(1.3)] | ND(1.2) | ND(1.2) |
| Sulfide | | ND(286) | 269 | ND(227) | ND(218) | ND(231) [ND(228)] | ND(242) | ND(243) |
| Thallium | | ND(1.4) | ND(1.2) | ND(1.1) | ND(1.1) | ND(2.3) [ND(1.3)] | ND(1.2) | ND(1.2) |
| Tin | | ND(14.3) | ND(11.8) | ND(11.4) | ND(10.9) | ND(11.5) [ND(12.8)] | 1.0 J* | ND(12.2) |
| Vanadium | | 13.6 | 11.1 | 7.1 | 8.2 | 11.0 [12.1] | 7.1 | 8.3 |
| Zinc | | 62.6 | 51.7 | 56.6 | 54.0 | 57.5 [59.3] | 65.1 | 64.6 |

(See notes on page 4)

**TABLE 6**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**SUMMARY OF SOIL INORGANICS DATA**

(Results are presented in dry-weightparts per million, ppm)

| Parameter | Sample ID:<br>Sample Depth (feet):<br>Date Collected: | ASB-28<br>6 - 8<br>02/17/98 | ASB-29<br>2 - 4<br>02/18/98 | ASB-30<br>0 - 2<br>02/18/98 | ASB-31<br>2 - 4<br>02/18/98 | ASB-32<br>6 - 8<br>02/18/98 | ASB-33<br>0 - 2<br>02/18/98 | ASB-34<br>4 - 6<br>02/18/98 |
|---|---|---|---|---|---|---|---|---|
| **Inorganics** | | | | | | | | |
| Antimony | | ND (7.5) J~ | ND(6.8) J~ | ND(7.0) J~ | ND(6.7) J~ | ND(7.5) J~ | ND(7.6) J~ | ND(10.2) J~ |
| Arsenic | | 2.7 | 3.6 | 3.2 | 6.7 | 2.8 | 5.0 | 6.1 |
| Barium | | 21.4 J* | 27.2 | 45.3 | 23.6 | 10.2 J* | 87.3 | 101 |
| Beryllium | | 0.29 J* | 0.23 J* | 0.29 J* | 0.22 J* | 0.18 J* | 0.55 J* | 0.65 J* |
| Cadmium | | ND(0.62) | ND(0.57) | ND(0.58) | ND(0.56) | ND(0.62) | ND(0.64) | ND(0.85) |
| Chromium | | 11.7 | 7.1 | 10.5 | 7.0 | 5.3 | 19.7 | 24.9 |
| Cobalt | | 13.1 | 7.6 | 7.3 | 7.4 | 6.6 | 16.5 | 17.6 |
| Copper | | 21.5 | 12.2 | 14.3 | 16.2 | 11.7 | 28.2 | 34.3 |
| Lead | | 7.7 | 6.0 | 7.5 | 8.9 | 5.1 | 10.8 | 17.0 |
| Mercury | | 0.0051 J* | ND(0.027) | 0.13 | ND(0.044) | ND(0.030) | ND(0.083) | ND(0.044) |
| Nickel | | 21.1 | 12.2 | 13.2 | 12.5 | ND(9.6) | 24.6 | 29.1 |
| Selenium | | 0.69 | 0.41 J* | ND(0.58) | 0.60 | ND(0.62) | 0.67 | 1.3 |
| Silver | | ND(1.2) | ND(1.1) | ND(1.2) | ND(1.1) | ND(1.2) | ND(1.3) | ND(1.7) |
| Sulfide | | ND(249) | ND(227) | ND(234) | ND(224) | 696 | ND(255) | 1140 |
| Thallium | | ND(1.2) | ND(1.1) | ND(1.2) | ND(1.1) | ND(1.2) | 1.0 J* | ND(1.7) |
| Tin | | ND(12.5) | ND(11.3) | ND(11.7) | ND(11.2) | ND(12.4) | ND(12.7) | ND(17.0) |
| Vanadium | | 11.0 | 7.7 | 10.6 | 5.9 | 4.9 J* | 24.8 | 27.9 |
| Zinc | | 68.9 | 41.1 | 42.2 | 43.8 | 39.1 | 75.2 | 100 |

Notes:

1. Sample depth elevations are relative to the ground surface prior to installation of the surface cover.
2. Samples were analyzed for Appendix IX+3 inorganic analytes; only those analytes detected in at least one sample are presented.
3. Indicates the laboratory duplicate analysis exceeded control limits.
4. B - Compound also detected in associated method blank.
5. E - Indicates an estimated value below the lower calibration limit, but above the detection limit.
6. J* - Indicates the reported value is less than the CLP-required detection limit (CRDL), but greater than the instrument detection limit (IDL).
7. ND(2.2) - Compound was not detected. The value in parentheses is the associated quantitation limit.
8. J~ - Indicates the reported value is estimated due to data validation qualification.
9. Duplicate results are presented in brackets.

**TABLE 7**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**ARARS FOR ALLENDALE SCHOOL REMOVAL ACTION**
**(Excluding management and disposition of excavated materials)**

| Regulation | Citation | Requirements | Applicability/Appropriateness | Proposal Re Attainment |
|---|---|---|---|---|
| **Federal ARARs** | | | | |
| TSCA Regulations (Remediation Waste) | 40 CFR 761.61 | Establishes cleanup options for PCB remediation wastes, including PCB-contaminated soils. Options include risk-based approval by EPA. Parties seeking risk-based approval must demonstrate that cleanup plans will not pose an unreasonable risk of injury to health or the environment. | Applicable to soils with PCBs$ 50 ppm that were released into the environment prior to April 18, 1978 and to any PCB waste released after that date where original source was $ 500 ppm PCBs beginning on April 18, 1978, or $ 50 ppm PCBs beginning on July 2, 1979. | Will be attained based on EPA finding that Removal Action conducted in accordance with RD/RA Work Plan will result in no unreasonable risk of injury to health or the environment. |
| TSCA Regulations (Decontamination) | 40 CFR 761.79 | Establishes decontamination standards and procedures for removing PCBs from non-porous sources. | Applicable to decontamination of equipment used during construction. | Will be attained by implementing equipment cleaning techniques in accordance with Section 4.5.6 of RD/RA Work Plan. |
| Clean Water Act NPDES Regulations (Stormwater Discharges) | 40 CFR 122.26(c)(ii)(C)<br>40 CFR 122.44(k)<br>40 CFR 125.100-.104 | Discharges of stormwater associated with construction activities are required to implement best management practices to control pollutants in stormwater discharges during and after construction activities. | Applicable to discharges of stormwater. | Will be attained by implementing erosion controls and stormwater management measures in accordance with Sections 4.4.5 and 4.6 of RD/RA Work Plan. |

**TABLE 7**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**ARARS FOR ALLENDALE SCHOOL REMOVAL ACTION**
**(Excluding management and disposition of excavated materials)**

| Regulation | Citation | Requirements | Applicability/Appropriateness | Proposal Re Attainment |
|---|---|---|---|---|
| **Federal ARARs (cont'd)** | | | | |
| RCRA Regulations (Identification and Listing of Hazardous Wastes; Toxicity Characteristics) | 40 CFR 261.24 | Identifies the concentrations of contaminants which, if present, are characteristic of hazardous waste due to toxicity. The analytical test set forth in Appendix II of 40 CFR Part 261 is referred to as the Toxicity Characteristic Leaching Procedure (TCLP). | Relevant and appropriate. | Will be attained based on conservative screening evaluation presented in Section 3.5 of Work Plan, which indicates that no soils at this Property would constitute a RCRA characteristic hazardous waste under these regulations. |
| **State ARARs** | | | | |
| Mass. Air Pollution Control Requirements | 310 CMR 7.09 | Prohibition against creating condition of air pollution in connection with dust generating activity. | Applicable to construction activities generating dust. | Will be attained by implementing dust control measures and air monitoring in accordance with Sections 4.4.5, 4.4.6, and 4.5.5. of RD/RA Work Plan. |

**TABLE 8**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**EVALUATION OF NON-PCB SURFACE SOIL DATA - INITIAL SCREENING(1)**
**(Results presented in dry-weight parts per million, ppm)**

| Detected Appendix IX+3 Constituents(2) | Detection Frequency | Maximum Detected Concentration | Screening Preliminary Remediation Goals (PRGs)(3) | Constituent Retained for Further Evaluation?(4) |
|---|---|---|---|---|
| **Volatile Organics** | | | | |
| Acetone | 1/13 | 0.009 | 1,444 | No |
| Methylene Chloride | 2/13 | 0.009 | 8.5 | No |
| **Semivolatile Organics** | | | | |
| Acenaphthene | 1/6 | 0.092 | 2,550 | No |
| Acenaphthylene | 1/6 | 0.48 | 55 (5) | No |
| Anthracene | 2/6 | 0.39 | 14,333 | No |
| Benzo(a)anthracene | 5/6 | 2.1 | 0.56 | Yes |
| Benzo(a)pyrene | 5/6 | 2.4 | 0.056 | Yes |
| Benzo(b)fluoranthene | 5/6 | 2.5 | 0.56 | Yes |
| Benzo(g,h,i)perylene | 4/6 | 1.2 | 55 (5) | No |
| Benzo(k)fluoranthene | 5/6 | 1.8 | 5.6 | No |
| Bis(2-ethylhexyl)phthalate | 2/6 | 0.30 | 32 | No |
| Chrysene | 5/6 | 2.9 | 56 | No |
| Dibenz(a,h)anthracene | 1/6 | 0.50 J | 0.056 (6) | Yes |
| Fluoranthene | 6/6 | 4.6 | 1,998 | No |
| Fluorene | 1/6 | 0.27 | 1,789 | No |
| Indeno(1,2,3-cd)pyrene | 4/6 | 1.3 | 0.56 | Yes |
| Phenanthrene | 5/6 | 2.6 | 55 (5) | No |
| Pyrene | 6/6 | 4.0 | 1,483 | No |
| **Pesticides** | | | | |
| 4,4'-DDE | 1/4 | 0.0045 | 1.7 | No |
| 2,4,5-T | 1/6 | 0.06 | 545 | No |
| 2,4,5-TP | 1/6 | 0.07 | 436 | No |
| **Inorganics** | | | | |
| Arsenic | 6/6 | 17 | 21 | No |
| Barium | 6/6 | 43.9 | 5,155 | No |
| Beryllium | 6/6 | 0.46 | 150 | No |
| Chromium | 6/6 | 12.7 | 211 | No |
| Cobalt | 6/6 | 12.1 | 3,253 | No |
| Copper | 6/6 | 25.1 | 2,784 | No |
| Lead | 6/6 | 55.8 | 400 | No |
| Mercury | 4/6 | 0.17 J | 22 | No |
| Nickel | 6/6 | 18.5 | 1,499 | No |
| Selenium | 3/6 | 1.6 | 375 | No |
| Sulfide | 2/6 | 373 | NA | Yes (7) |
| Thallium | 1/6 | 17.0 | 6 | No |
| Tin | 1/6 | 5.0 | 44,970 | No |
| Vanadium | 6/6 | 18.5 | 525 | No |
| Zinc | 6/6 | 101 | 22,486 | No |
| **Dioxins/Furans** | | | | |
| Total TEQ (WHO TEFs) (8) | 6/6 | 0.00035 | 0.001 (9) | No |

Notes:

1. Data set includes 14 samples from 12 locations within the uppermost one foot of the Property. Data set has been modified to reflect the anticipated PCB soil removal actions.
2. Analytical data for all samples are provided in Tables 2 through 6 of the Work Plan.
3. Except as noted below, PRGs are based on USEPA Region 9 PRGs for residential soils.
4. Constituent is retained if the maximum detected concentration exceeds the screening PRG. Table 9 presents subsequent evaluations.
5. The PRG for Naphthalene (55 ppm) was used for non-carcinogenic PAHs for which there are no Region 9 PRGs.
6. The PRG for Benzo(a)pyrene (0.056 ppm) was used for carcinogenic PAHs for which there are no Region 9 PRGs.
7. Since PRG values are not available, the constituent was retained for further evaluation.
8. TEQ values were calculated using Toxic Equivalence Factors (TEFs) derived by the World Health Organization in "Toxic Equivalence Factors (TEFs) for PCBs, PCDDs, PCDFs for Humans and Wildlife", and published by Van den Berg, et. al., in Environmental Health Perspectives 106(2), December 1998.
9. For dioxin/furan TEQs, the screening PRG was the USEPA's dioxin PRG of 0.001 ppm for residential areas, as established in USEPA OSWER Directive 9200.4-26 (April 13, 1998).

**TABLE 9**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**EVALUATION OF NON-PCB SURFACE SOIL DATA - COMPARISON TO BACKGROUND CONDITIONS AND MCP SOIL STANDARDS**
**(Results presented in dry-weight parts per million, ppm)**

| | Allendale School Property Soil Data | | | |
|---|---|---|---|---|
| **Retained Constituent (Table 8)** | **Detection Frequency** | **Maximum Detected Concentration** | **Median (1)** | **Arithmetic Average(1) (2)** |
| Benzo(a)anthracene | 5/6 | 2.1 | ND(0.17) (3) | NC |
| Benzo(a)pyrene | 6/6 | 2.4 | ND(0.17) | NC |
| Benzo(b)fluoranthene | 6/6 | 2.5 | ND(0.17) | NC |
| Dibenz(a,h)anthracene | 1/6 | 0.50 J | ND(0.19) | 0.22 |
| Indeno(1,2,3-cd)pyrene | 4/6 | 1.3 | ND(0.17) | 0.26 |
| Sulfide | 2/6 | 373 | ND(153) | 141 |

| | Background Data(4) | | | |
|---|---|---|---|---|
| **Retained Constituent** | **Detection Frequency** | **Maximum Detected Concentration** | **Median (1)** | **Constituent Exceeds Background? (5)** |
| Benzo(a)anthracene | 15/15 | 1.6 | 0.60 | No |
| Benzo(a)pyrene | 15/15 | 1.8 | 0.60 | No |
| Benzo(b)fluoranthene | 15/15 | 2.0 | 0.53 | No |
| Dibenz(a,h)anthracene | 12/15 | 0.22 J | 0.11 | Yes |
| Indeno(1,2,3-cd)pyrene | 14/15 | 0.53 | 0.20 | Yes |
| Sulfide | 1/15 | 205 | ND(116) | Yes |

| **Retained Constituent** | **MCP Method 1 S-1/GW-3 Standard (ppm)** | **Constituent Exceeds S-1/GW-3 Standard? (6)** | **Constituent Subject to Further Evaluation?** |
|---|---|---|---|
| Dibenz(a,h)anthracene | 0.7 | No | No |
| Indeno(1,2,3-cd)pyrene | 0.7 | No | No |
| Sulfide | None | -- | No (7) |

Notes:

(1) For samples in which the constituent was not detected, one-half the detection limit was used as a proxy concentration to calculate medians and arithmetic averages.
(2) An arithmetic average was not calculated (NC) if the constituent was not present above background conditions.
(3) Constituent was not detected. The value reported is one-half the analytical detection limit.
(4) Site-specific background data obtained from the Housatonic River floodplain sampling program upstream of the GE facility.
(5) Constituent data were compared to background data in accordance with MDEP's "Guidance for Disposal Site Risk Characterization." The maximum detected concentration and median concentration from each data set were compared to determine if the site data were consistent with site-specific background data., with a 50 percent tolerance if the maximum or median exceeds background but the other does not.
(6) If appropriate, the constituent arithmetic average concentration is compared to the MCP Method 1 S-1 standard to determine if there is an exceedence.
(7) Since there are no PRGs or MCP Method 1 standards for sulfide, sulfide was further evaluated in relation to background levels. Based on this evaluation, sulfide was excluded from the need for additional response actions since the maximum detected and median concentration values are only slightly higher than the corresponding site-specific background concentrations.

**TABLE 10**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**EVALUATION OF NON-PCB SOIL DATA - ALL DEPTHS - INITIAL SCREENING(1)**
**ALL SAMPLES (top 15 feet)**
**(Results presented in dry-weight parts per million, ppm)**

| Detected Appendix IX+3 Constituents (2) | Detection Frequency | Maximum Detected Concentrations | Screening Preliminary Remediation Goals (PRGs)(3) | Constituent Retained for Further Evaluation? (4) |
|---|---|---|---|---|
| **Volatile Organics** | | | | |
| Acetone | 1/26 | 0.009 | 1,444 | No |
| Methylene Chloride | 2/26 | 0.007 | 8.5 | No |
| **Semivolatile Organics** | | | | |
| Acenaphthene | 1/19 | 0.092 | 2,550 | No |
| Acenaphthylene | 3/19 | 0.48 | 55 (5) | No |
| Anthracene | 4/19 | 0.39 | 14,333 | No |
| Benzo(a)anthracene | 7/19 | 2.1 | 0.56 | Yes |
| Benzo(a)pyrene | 7/19 | 2.4 | 0.056 | Yes |
| Benzo(b)fluoranthene | 7/19 | 2.5 | 0.56 | Yes |
| Benzo(g,h,i)perylene | 3/19 | 1.2 | 55 (5) | No |
| Benzo(k)fluoranthene | 7/19 | 1.8 | 5.6 | No |
| Bis(2-ethylhexyl)phthalate | 7/19 | 0.51 | 32 | No |
| Chrysene | 7/19 | 2.9 | 56 | No |
| Di-n-butylphthalate | 1/19 | 0.052 J | 5,450 | No |
| Dibenz(a,h)anthracene | 2/19 | 0.50 J | 0.056 (6) | Yes |
| Fluoranthene | 8/19 | 4.6 | 1,998 | No |
| Fluorene | 1/19 | 0.27 | 1,789 | No |
| Indeno(1,2,3-cd)pyrene | 4/19 | 1.3 | 0.56 | Yes |
| Phenanthrene | 7/19 | 2.6 | 55 (5) | No |
| Pyrene | 8/19 | 4.0 | 1,483 | No |
| **Pesticides** | | | | |
| 4,4'-DDE | 1/14 | 0.0045 | 1.7 | No |
| 4,4'-DDT | 1/14 | 0.0023 | 1.7 | No |
| Dieldrin | 1/14 | 0.0093 J | 0.028 | No |
| 2,4,5-T | 1/16 | 0.06 | 545 | No |
| 2,4,5-TP | 1/16 | 0.07 | 436 | No |
| **Inorganics** | | | | |
| Antimony | 1/16 | 2.9 J | 30 | No |
| Arsenic | 16/16 | 17 | 21 | No |
| Barium | 16/16 | 101 | 5,155 | No |
| Beryllium | 16/16 | 0.65 | 150 | No |
| Cadmium | 4/16 | 0.20 J | 37 | No |
| Chromium | 16/16 | 24.9 | 211 | No |
| Cobalt | 16/16 | 17.6 | 3,253 | No |
| Copper | 16/16 | 34.3 | 2,784 | No |
| Lead | 16/16 | 55.8 | 400 | No |
| Mercury | 6/16 | 0.17 J | 22 | No |
| Nickel | 15/16 | 29.1 | 1,499 | No |
| Selenium | 8/16 | 1.6 | 375 | No |
| Silver | 4/16 | 0.69 J | 375 | No |
| Sulfide | 3/16 | 696 | NA | Yes(7) |
| Thallium | 2/16 | 17.0 | 6 | No |
| Tin | 1/16 | 5.0 | 44,970 | No |
| Vanadium | 16/16 | 27.9 | 525 | No |
| Zinc | 16/16 | 101 | 22,486 | No |
| **Dioxins/Furans** | | | | |
| Total TEQs (8) | 13/19 | 0.00035 | 0.001 (9) | No |

Notes:

1. Data set includes 14 samples from 12 locations within the uppermost one foot of the Property. Data set has been modified to reflect the anticipated PCB soil removal actions.
2. Analytical data for all samples are provided in Tables 2 through 6 of the Work Plan.
3. Except as noted below, PRGs are based on USEPA Region 9 PRGs for residential soils.
4. Constituent is retained if the maximum detected concentration exceeds the screening PRG. Table 9 presents subsequent evaluations.
5. The PRG for Naphthalene (55 ppm) was used for non-carcinogenic PAHs for which there are no Region 9 PRGs.
6. The PRG for Benzo(a)pyrene (0.056 ppm) was used for carcinogenic PAHs for which there are no Region 9 PRGs.
7. Since PRG values are not available, the constituent was retained for further evaluation.
8. TEQ values were calculated using Toxic Equivalence Factors (TEFs) derived by the World Health Organization in "Toxic Equivalence Factors (TEFs) for PCBs, PCDDs, PCDFs for Humans and Wildlife", and published by Van den Berg, et. al., in Environmental Health Perspectives 106(2), December 1998.
9. For dioxin/furan TEQs, the screening PRG was the USEPA's dioxin PRG of 0.001 ppm for residential areas, as established in USEPA OSWER Directive 9200.4-26 (April 13, 1998).

**TABLE 11**

**GENERAL ELECTRIC COMPANY**
**PITTSFIELD, MASSACHUSETTS**
**REMOVAL DESIGN/REMOVAL ACTION WORK PLAN FOR THE ALLENDALE SCHOOL PROPERTY**

**EVALUATION OF NON-PCB SOIL DATA - ALL DEPTHS - COMPARISON TO BACKGROUND CONDITIONS AND MCP SOIL STANDARDS**
**(Results presented in dry-weight parts per million, ppm)**

| | Allendale School Property Soil Data (ppm) | | | |
|---|---|---|---|---|
| **Retained Constituent** | **Detection Frequency** | **Maximum Detected Concentration** | **Median (1)** | **Arithmetic Average (1)(2)** |
| Benzo(a)anthracene | 7/19 | 2.1 | ND(0.185) (3) | NC |
| Benzo(a)pyrene | 7/19 | 2.4 | ND(0.185) | NC |
| Benzo(b)fluoranthene | 7/19 | 2.5 | ND(0.185) | NC |
| Dibenz(a,h)anthracene | 2/19 | 0.50 J | ND(0.19) | 0.20 |
| Indeno(1,2,3-cd)pyrene | 4/19 | 1.3 | ND(0.185) | 0.22 |
| Sulfide | 3/19 | 696 | ND(139) | 189 |

| | Site-Specific Background Data (ppm) (4) | | | |
|---|---|---|---|---|
| **Retained Constituent** | **Detection Frequency** | **Maximum Detected Concentration** | **Median (1)** | **Constituent Exceeds Background? (5)** |
| Benzo(a)anthracene | 19/107 | 1.6 | ND(0.20) | No |
| Benzo(a)pyrene | 20/107 | 1.8 | ND(0.20) | No |
| Benzo(b)fluoranthene | 19/107 | 2.0 | ND(0.20) | No |
| Dibenz(a,h)anthracene | 14/107 | 0.22 | ND(0.19) | Yes |
| Indeno(1,2,3-cd)pyrene | 18/107 | 0.53 | ND(0.19) | Yes |
| Sulfide | 21/102 | 928 | ND(119) | No |

| **Retained Constituent** | **MCP Method 1 S-1/GW-3 Standard (ppm)** | **Constituent Exceeds S-1/GW-3 Standard? (6)** | **Constituent Subject to Further Evaluation?** |
|---|---|---|---|
| Dibenz(a,h)anthracene | 0.7 | No | No |
| Indeno(1,2,3-cd)pyrene | 0.7 | No | No |

Notes:

(1) For samples in which the constituent was not detected, one-half the detection limit was used as a proxy concentration to calculate medians and arithmetic averages.
(2) An arithmetic average was not calculated (NC) if the constituent was not present above background conditions.
(3) Constituent was not detected. The value reported is one-half the analytical detection limit.
(4) Site-specific background data obtained from the Housatonic River floodplain sampling program upstream of the GE facility.
(5) Constituent data were compared to background data in accordance with MDEP's "Guidance for Disposal Site Risk Characterization." The maximum detected concentration and median concentration from each data set were compared to determine if the site data were consistent with site-specific background data., with a 50 percent tolerance if the maximum or median exceeds background but the other does not.
(6) If appropriate, the constituent arithmetic average concentration is compared to the MCP Method 1 S-1 standard to determine if there is an exceedence.