GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Delivery

July 10, 2006

Mr. William P. Lovely, Jr.
United States Environmental Protection Agency
EPA New England (MC HBO)
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Re: GE-Pittsfield/Housatonic River Site
Former Oxbow Areas A and C (GECD410)
Former Oxbow Areas J and K (GECD420)
Lyman Street Area (GECD430) – Properties West of Lyman Street
Supplemental Information Package – Analytical Data for Proposed Backfill Sources

Dear Mr. Lovely:

Attached is a summary of the laboratory results for the proposed backfill and topsoil sources to be used during the response actions at three Removal Action Areas (RAAs) at the GE-Pittsfield/Housatonic River Site – namely, Former Oxbow Areas A and C; Former Oxbow Areas J and K; and the portion of Lyman Street Area west of Lyman Street. As indicated in the attached Table 1, the backfill sample was collected at Pittsfield Sand and Gravel, Inc.'s Hurley Pit located in Pittsfield, Massachusetts. In addition, the topsoil sample was collected from a stockpile located at the Maxymillian Technologies, Inc. facility also located in Pittsfield, Massachusetts.

As shown on Table 1, PCBs were not detected in either of the samples collected from the proposed backfill and topsoil sources. However, certain non-PCB constituents were detected in these samples. As such, the analytical results for each of the detected constituents were compared to the applicable EPA Region 9 Preliminary Remediation Goals (PRGs) for residential areas. That comparison indicated that all detected volatile, semivolatile and inorganic constituents were below their applicable PRGs, with the exception of arsenic, which was detected in the backfill and topsoil samples at concentrations of 1.4 parts per million (ppm) and 4.99 ppm, respectively. However, those detected concentrations are well below the MCP Method 1 Soil Standard applicable to these properties. As such, use of these proposed backfill and topsoil materials will not impact the achievement of the applicable Performance Standards under post-remediation conditions at each property.

Please feel free to contact me if you have any questions regarding this letter or the attached supplemental information.

Sincerely,

Richard W. Gates/KB

Richard W. Gates
Remediation Project Manager

KLB/csc
Attachment
V:\GE_Pittsfield_CD_Lyman_St\Reports and Presentations\Proposed Backfill\39062196Ltr.doc

cc: Dean Tagliaferro, EPA
Tim Conway, EPA
John Kilborn, EPA
Holly Inglis, EPA
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Andrew Silfer, GE
Roderic McLaren, GE*
James Nuss, BBL
James Bieke, Goodwin Procter LLP
Public Information Repositories
GE Internal Repository

* *without attachments*

TABLE 1
ANALYTICAL RESULTS FOR PROPOSED BACKFILL MATERIALS

FORMER OXBOW AREAS A AND C, FORMER OXBOW AREAS J AND K, LYMAN STREET AREA
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Parameter / Sample ID: / Date Collected:	Hurley-Backfill-2 [1] 06/05/06	Maxymillian-Topsoil-2 [2] 06/05/06
Volatile Organics		
1,1,1,2-Tetrachloroethane	ND(0.0050)	ND(0.0050)
1,1,1-Trichloroethane	ND(0.0050)	ND(0.0050)
1,1,2,2-Tetrachloroethane	ND(0.0050)	ND(0.0050)
1,1,2-Trichloroethane	ND(0.0050)	ND(0.0050)
1,1-Dichloroethane	ND(0.0050)	ND(0.0050)
1,1-Dichloroethene	ND(0.0050)	ND(0.0050)
1,2,3-Trichloropropane	ND(0.0050)	ND(0.0050)
1,2-Dibromo-3-chloropropane	ND(0.0050)	ND(0.0050)
1,2-Dibromoethane	ND(0.0050)	ND(0.0050)
1,2-Dichloroethane	ND(0.0050)	ND(0.0050)
1,2-Dichloropropane	ND(0.0050)	ND(0.0050)
1,4-Dioxane	ND(0.0050)	ND(0.0050)
2-Butanone	ND(0.0050)	ND(0.0050)
2-Chloro-1,3-butadiene	ND(0.0050)	ND(0.0050)
2-Chloroethylvinylether	ND(0.0050)	ND(0.0050)
2-Hexanone	ND(0.0050)	ND(0.0050)
3-Chloropropene	ND(0.0050)	ND(0.0050)
4-Methyl-2-pentanone	ND(0.0050)	ND(0.0050)
Acetone	ND(0.0050)	0.0074
Acetonitrile	ND(0.0050)	ND(0.0050)
Acrolein	ND(0.0050)	ND(0.0050)
Acrylonitrile	ND(0.0050)	ND(0.0050)
Benzene	ND(0.0050)	ND(0.0050)
Bromodichloromethane	ND(0.0050)	ND(0.0050)
Bromoform	ND(0.0050)	ND(0.0050)
Bromomethane	ND(0.0050)	ND(0.0050)
Carbon Disulfide	ND(0.0050)	ND(0.0050)
Carbon Tetrachloride	ND(0.0050)	ND(0.0050)
Chlorobenzene	ND(0.0050)	ND(0.0050)
Chloroethane	ND(0.0050)	ND(0.0050)
Chloroform	ND(0.0050)	ND(0.0050)
Chloromethane	ND(0.0050)	ND(0.0050)
cis-1,3-Dichloropropene	ND(0.0050)	ND(0.0050)
Dibromochloromethane	ND(0.0050)	ND(0.0050)
Dibromomethane	ND(0.0050)	ND(0.0050)
Dichlorodifluoromethane	ND(0.0050)	ND(0.0050)
Ethyl Methacrylate	ND(0.0050)	ND(0.0050)
Ethylbenzene	ND(0.0050)	ND(0.0050)
Iodomethane	ND(0.0050)	ND(0.0050)
Isobutanol	ND(0.0050)	ND(0.0050)
Methacrylonitrile	ND(0.0050)	ND(0.0050)
Methyl Methacrylate	ND(0.0050)	ND(0.0050)
Methylene Chloride	ND(0.0050)	ND(0.0050)
Propionitrile	ND(0.0050)	ND(0.0050)
Styrene	ND(0.0050)	ND(0.0050)
Tetrachloroethene	ND(0.0050)	ND(0.0050)
Toluene	ND(0.0050)	ND(0.0050)
trans-1,2-Dichloroethene	ND(0.0050)	ND(0.0050)
trans-1,3-Dichloropropene	ND(0.0050)	ND(0.0050)
trans-1,4-Dichloro-2-butene	ND(0.0050)	ND(0.0050)
Trichloroethene	ND(0.0050)	ND(0.0050)
Trichlorofluoromethane	ND(0.0050)	ND(0.0050)
Vinyl Acetate	ND(0.0050)	ND(0.0050)
Vinyl Chloride	ND(0.0050)	ND(0.0050)
Xylenes (total)	ND(0.010)	ND(0.010)

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GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Parameter / Sample ID: / Date Collected:	Hurley-Backfill-2 [1] 06/05/06	Maxymillian-Topsoil-2 [2] 06/05/06
PCBs		
Aroclor-1016	ND(0.033)	ND(0.040)
Aroclor-1221	ND(0.033)	ND(0.040)
Aroclor-1232	ND(0.033)	ND(0.040)
Aroclor-1242	ND(0.033)	ND(0.040)
Aroclor-1248	ND(0.033)	ND(0.040)
Aroclor-1254	ND(0.033)	ND(0.040)
Aroclor-1260	ND(0.033)	ND(0.040)
Total PCBs	ND(0.033)	ND(0.040)
Semivolatile Organics		
1,2,4,5-Tetrachlorobenzene	ND(0.33)	ND(0.39)
1,2,4-Trichlorobenzene	ND(0.33)	ND(0.39)
1,2-Dichlorobenzene	ND(0.0050)	ND(0.0050)
1,3,5-Trinitrobenzene	ND(1.7)	ND(2.0)
1,3-Dichlorobenzene	ND(0.0050)	ND(0.0050)
1,3-Dinitrobenzene	ND(0.33)	ND(0.39)
1,4-Dichlorobenzene	ND(0.0050)	ND(0.0050)
1,4-Naphthoquinone	ND(0.33)	ND(0.39)
1-Naphthylamine	ND(1.7)	ND(2.0)
2,3,4,6-Tetrachlorophenol	ND(0.33)	ND(0.39)
2,4,5-Trichlorophenol	ND(0.33)	ND(0.39)
2,4,6-Trichlorophenol	ND(0.33)	ND(0.39)
2,4-Dichlorophenol	ND(0.33)	ND(0.39)
2,4-Dimethylphenol	ND(0.33)	ND(0.39)
2,4-Dinitrophenol	ND(1.7)	ND(2.0)
2,4-Dinitrotoluene	ND(0.33)	ND(0.39)
2,6-Dichlorophenol	ND(0.33)	ND(0.39)
2,6-Dinitrotoluene	ND(0.33)	ND(0.39)
2-Acetylaminofluorene	ND(0.67)	ND(0.78)
2-Chloronaphthalene	ND(0.33)	ND(0.39)
2-Chlorophenol	ND(0.33)	ND(0.39)
2-Methylnaphthalene	ND(0.33)	ND(0.39)
2-Methylphenol	ND(0.33)	ND(0.39)
2-Naphthylamine	ND(1.7)	ND(2.0)
2-Nitroaniline	ND(0.33)	ND(0.39)
2-Nitrophenol	ND(0.33)	ND(0.39)
2-Picoline	ND(0.33)	ND(0.39)
3&4-Methylphenol	ND(0.33)	ND(0.39)
3,3'-Dichlorobenzidine	ND(0.67)	ND(0.78)
3,3'-Dimethylbenzidine	ND(1.7)	ND(2.0)
3-Methylcholanthrene	ND(0.33)	ND(0.39)
3-Nitroaniline	ND(1.7)	ND(2.0)
4,6-Dinitro-2-methylphenol	ND(1.7)	ND(2.0)
4-Aminobiphenyl	ND(0.33)	ND(0.39)
4-Bromophenyl-phenylether	ND(0.33)	ND(0.39)
4-Chloro-3-Methylphenol	ND(0.33)	ND(0.39)
4-Chloroaniline	ND(1.7)	ND(2.0)
4-Chlorobenzilate	ND(0.33)	ND(0.39)
4-Chlorophenyl-phenylether	ND(0.33)	ND(0.39)
4-Nitroaniline	ND(1.7)	ND(2.0)
4-Nitrophenol	ND(1.7)	ND(2.0)
4-Nitroquinoline-1-oxide	ND(1.7)	ND(2.0)
4-Phenylenediamine	ND(0.67)	ND(0.78)
5-Nitro-o-toluidine	ND(0.33)	ND(0.39)
7,12-Dimethylbenz(a)anthracene	ND(0.33)	ND(0.39)
a,a'-Dimethylphenethylamine	ND(1.7)	ND(2.0)
Acenaphthene	ND(0.33)	ND(0.39)

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GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Parameter / Sample ID: / Date Collected:	Hurley-Backfill-2 [1] 06/05/06	Maxymillian-Topsoil-2 [2] 06/05/06
Semivolatile Organics (continued)		
Acenaphthylene	ND(0.33)	ND(0.39)
Acetophenone	ND(0.33)	ND(0.39)
Aniline	ND(0.33)	ND(0.39)
Anthracene	ND(0.33)	ND(0.39)
Aramite	ND(0.33)	ND(0.39)
Azobenzene	ND(0.33)	ND(0.39)
Benzidine	ND(0.67)	ND(0.78)
Benzo(a)anthracene	ND(0.33)	0.14 J
Benzo(a)pyrene	ND(0.33)	ND(0.39)
Benzo(b)fluoranthene	ND(0.33)	0.12 J
Benzo(g,h,i)perylene	ND(0.33)	ND(0.39)
Benzo(k)fluoranthene	ND(0.33)	ND(0.39)
Benzyl Alcohol	ND(0.67)	ND(0.78)
bis(2-Chloroethoxy)methane	ND(0.33)	ND(0.39)
bis(2-Chloroethyl)ether	ND(0.33)	ND(0.39)
bis(2-Chloroisopropyl)ether	ND(0.33)	ND(0.39)
bis(2-Ethylhexyl)phthalate	ND(0.33)	ND(0.39)
Butylbenzylphthalate	ND(0.33)	ND(0.39)
Chrysene	ND(0.33)	0.13 J
Diallate	ND(0.33)	ND(0.39)
Dibenzo(a,h)anthracene	ND(0.33)	ND(0.39)
Dibenzofuran	ND(0.33)	ND(0.39)
Diethylphthalate	ND(0.33)	ND(0.39)
Dimethylphthalate	ND(0.33)	ND(0.39)
Di-n-Butylphthalate	ND(0.33)	ND(0.39)
Di-n-Octylphthalate	ND(0.33)	ND(0.39)
Diphenylamine	ND(0.33)	ND(0.39)
Ethyl Methanesulfonate	ND(0.33)	ND(0.39)
Fluoranthene	ND(0.33)	0.20 J
Fluorene	ND(0.33)	ND(0.39)
Hexachlorobenzene	ND(0.33)	ND(0.39)
Hexachlorobutadiene	ND(0.33)	ND(0.39)
Hexachlorocyclopentadiene	ND(0.67)	ND(0.78)
Hexachloroethane	ND(0.33)	ND(0.39)
Hexachlorophene	ND(0.33)	ND(0.39)
Hexachloropropene	ND(0.67)	ND(0.78)
Indeno(1,2,3-cd)pyrene	ND(0.33)	ND(0.39)
Isodrin	ND(0.33)	ND(0.39)
Isophorone	ND(0.33)	ND(0.39)
Isosafrole	ND(0.33)	ND(0.39)
Methapyrilene	ND(0.33)	ND(0.39)
Methyl Methanesulfonate	ND(0.33)	ND(0.39)
Naphthalene	ND(0.33)	ND(0.39)
Nitrobenzene	ND(0.33)	ND(0.39)
N-Nitrosodiethylamine	ND(0.33)	ND(0.39)
N-Nitrosodimethylamine	ND(0.33)	ND(0.39)
N-Nitroso-di-n-butylamine	ND(0.33)	ND(0.39)
N-Nitroso-di-n-propylamine	ND(0.33)	ND(0.39)
N-Nitrosomethylethylamine	ND(0.33)	ND(0.39)
N-Nitrosomorpholine	ND(0.33)	ND(0.39)
N-Nitrosopiperidine	ND(0.33)	ND(0.39)
N-Nitrosopyrrolidine	ND(0.33)	ND(0.39)
o,o,o-Triethylphosphorothioate	ND(0.33)	ND(0.39)
o-Toluidine	ND(0.33)	ND(0.39)
p-Dimethylaminoazobenzene	ND(0.33)	ND(0.39)
Pentachlorobenzene	ND(0.33)	ND(0.39)

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GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
(Results are presented in dry weight parts per million, ppm)

Parameter / Sample ID: / Date Collected:	Hurley-Backfill-2 [1] 06/05/06	Maxymillian-Topsoil-2 [2] 06/05/06
Semivolatile Organics (continued)		
Pentachloroethane	ND(0.0050)	ND(0.0050)
Pentachloronitrobenzene	ND(0.33)	ND(0.39)
Pentachlorophenol	ND(1.7)	ND(2.0)
Phenacetin	ND(0.33)	ND(0.39)
Phenanthrene	ND(0.33)	0.094 J
Phenol	ND(0.33)	ND(0.39)
Pronamide	ND(0.33)	ND(0.39)
Pyrene	ND(0.33)	0.35 J
Pyridine	ND(0.33)	ND(0.39)
Safrole	ND(0.33)	ND(0.39)
Thionazin	ND(0.67)	ND(0.78)
Inorganics		
Antimony	ND(4.16)	ND(4.83)
Arsenic	1.40	4.99
Barium	16.5 B	56.6 B
Beryllium	0.133 B	0.0230 B
Cadmium	0.163 B	0.0350 B
Chromium	4.96	12.3
Cobalt	2.74	9.86
Copper	4.73 B	ND(24.2)
Lead	2.28	16.5 B
Mercury	0.00864 B	0.0719
Nickel	4.70 B	17.5
Selenium	2.05 B	2.22 B
Silver	ND(1.04)	ND(1.21)
Thallium	ND(1.04)	ND(1.21)
Tin	1.51 B	1.62 B
Vanadium	5.59	9.34
Zinc	13.4	66.8

Notes:

1. Sample collected by Blasland, Bouck, & Lee, Inc., (BBL) from Pittsfield Sand and Gravel, Inc.'s Hurley Pit located in Pittsfield Massachusetts.
2. Sample collected by BBL from stockpile located at Maxymillian Technologies, Inc. facility located in Pittsfield Massachusetts.
3. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.

Data Qualifiers:

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

Inorganics
B - Indicates an estimated value between the instrument detection limit (IDL) and (PQL).