GE - Housatonic
26
249902

GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

SDMS DocID 249902

Transmitted Via Overnight Delivery

April 4, 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
Lyman Street Area (GECD430)
Addendum to Final Removal Design/Removal Action Work Plan for Lyman Street Area

Dear Mr. Lovely:

In September 2005, the General Electric Company (GE) submitted to the United States Environmental Protection Agency (EPA) a document titled *Final Removal Design/Removal Action Work Plan for Lyman Street Area* (RD/RA Work Plan). EPA provided conditional approval of that work plan in a letter to GE dated March 6, 2006. That letter directed GE to prepare an Addendum to the RD/RA Work Plan to address EPA's comments and to provide a schedule for submitting a Supplemental Information Package. This letter serves as that Addendum.

GE's responses to the comments contained in EPA's conditional approval letter are set forth below.

EPA Comment No. 1 – *As described in Section 5.7 of the Work Plan, GE is required to implement a number of natural resource restoration/enhancement activities at the GE Lyman Street parking lot area. EPA understands that the natural resource trustees will provide comments on these activities to GE under separate cover. GE shall review these comments upon receipt and respond to the trustees, as appropriate.*

The natural resource trustees have provided a comment in a letter to GE dated March 7, 2006. The trustees comment is as follows:

Section 5.7, "Natural Resource Restoration/Enhancement Activities", page 5-7, 5-8: states: "To provide habitat primarily for fossorial and ground-dwelling wildlife, GE will place uncontaminated stumps and rock piles randomly throughout the GE Lyman Street parking lot area at a minimum spacing of 100 ft. The stumps and piles will be approximately 6 feet in diameter and no more than 3 feet in height. The stumps and rocks will be obtained by GE from an off-site source."

After consideration of possible impacts, the Trustees recommend modifying the performance standards such that "placement of stumps and rock piles" is not conducted as part of restoration enhancement activities. The creation of habitat for ground-dwelling wildlife, via stumps and rock piles, is not necessary and may in fact deter from the quality of the grassland habitat. Please delete the requirement for stumps and rock pile placement in the RD/RA specifications.

GE Response – Acknowledged. No stumps or rock piles will be placed in the Lyman Street Area parking lot area.

EPA Comment No. 2 – *Section 5.8 of the Work Plan states that GE will send a letter to the agencies describing how it proposes to compensate for losses in flood storage capacity. GE shall ensure that this letter, when submitted, will comply with Applicable or Relevant and Appropriate Requirements.*

GE Response – GE has evaluated potential flood storage gains and losses within the 100-year floodplain associated with various projects that have or will be conducted by GE in the near future in close proximity to the GE Plant Site. This evaluation was provided to EPA at a November 16, 2005 technical meeting in Pittsfield, Massachusetts. Based on recent conversations with EPA, GE is currently revising the evaluation. The results of the revised evaluation will be provided to EPA once completed.

EPA Comment No. 3 – *GE shall revise Section 5.9 to include the following language after the ARARs table: "In addition to the requirements specified above, if any historic or prehistoric artifacts or sites or any threatened or endangered species or species of special concern are identified by GE during the course of field activities, or identified by EPA or the MDEP and communicated to GE, GE shall notify EPA and discuss with EPA the need for and scope of additional actions, if any, needed to protect such resources."*

GE Response – A revised Section 5.9 including the indicated language is provided herein in Attachment A.

EPA Comment No. 4 – *GE shall select a remediation contractor to address the properties west of Lyman Street (i.e., parcels I9-4-14, I9-4-19, I9-4-25, I9-4-201, I9-4-202, I9-4-203) within 60 days from the date of this letter. GE shall also select a remediation contractor to address the properties east of Lyman Street (i.e., I9-8-1, and I9-8-2) within 30 days from EPA's notification to GE that EPA has completed its use of the Lyman Street Parking lot Area.*

GE Response – Acknowledged. GE will select remediation contractors within the time periods specified in EPA's condition number 4.

EPA Comment No. 5 – *The Contingency Plan presented in Section 7.3 of the Work Plan does not address activities that may be taken in response to any discovery of drums, capacitors, or other vessels during soil removal activities. GE shall revised Section 7.3 to include measures to address any such vessels discovered during soil removal activities including, but not limited to, immediate notification of such a discovery to EPA and MDEP, and discussions with EPA regarding the need for and/or scope of follow-up activities, such as additional air monitoring, investigations, and response actions, if necessary.*

GE Response – A revised Section 7.3 is provided herein in Attachment B.

EPA Comment No. 6 – *The restoration plan described in Section 7.5.10 of the Work Plan does not address the properties west of parcel I9-4-201. GE shall submit a detailed restoration plan that addresses the recreational portions of Parcels I9-4-19 and I9-4-14 including the portion of the drainage swale that requires excavation to its original grade. The swale shall be backfilled with riprap that extends to the river.*

GE Response – Technical Drawing 4: *Site Restoration Plan,* which was previously provided in the RD/RA Work Plan, has been revised based on the above comment and is provided herein in Attachment C.

EPA Comment No. 7 – *The annual inspections described in Section 8.4 do not address shallow excavations that have the potential to generate significant quantities of potentially contaminated soil. Because of the possibility that this material could be disposed of off-site or moved on-site, GE shall consider modifying Number 3(c) of Section 8.4 to read as follows: "any excavations or other activities that might involve the disturbance of ten (10) cubic yards of soil, or greater, regardless of depth." At a minimum, EPA expects that GE's Conditional Solution inspections will note for EPA's information evidence, based on visual observation, of significant excavations, that is, excavations involving the disturbance of ten (10) cubic yards of soil, or greater, regardless of depth, during the annual Conditional Solution inspections described in Number 3(c).*

GE Response – A revised Section 8.4 making the indicated modification is provided herein in Attachment D.

EPA Comment No. 8 – *Section 10.0 of Attachment E of the Work Plan does not describe the response actions that GE shall take should the PCB concentrations in ambient air exceed the 0.05 $\mu g/m^3$ notification level. If the 0.05 $\mu g/m^3$ notification level is exceeded, GE shall notify EPA promptly, but no later than 24 hours after receipt of the data showing such an exceedance, and shall implement additional response actions. The actions to be considered shall include those previously implemented by GE at other areas at the CD Site (e.g., increased frequency of monitoring, additional monitoring locations, increased use of dust suppression measures, modifications to dust-producing activities). If the action level of 0.1 $\mu g/m^3$ is exceeded, GE shall notify EPA immediately upon receipt of the data showing such an exceedance, and shall temporarily shut down excavation activities and discuss with EPA the need for and type of short-term actions to address the exceedance. In addition, GE shall evaluate the need for additional engineering controls, discuss that evaluation with EPA, and if warranted, propose such controls. EPA approval of appropriate response actions and engineering controls, if proposed, shall be required prior to GE resuming excavation activities.*

GE Response – A revised Section 10.0 of Attachment E of the RD/RA Work Plan is provided herein in Attachment E.

EPA Comment No. 9 – *The excavation limit shown along the northern edge of the Lyman Street parking lot on Sheet 3 of the Technical Drawings does not appear to be consistent with the 3-foot excavation shown on Figure 4-1 of the Conceptual RD/RA Work Plan. GE shall review the 985-foot removal elevation shown on Sheet 3 and revise, as appropriate.*

GE Response – A revised Technical Drawing 3 is provided herein in Attachment F.

EPA Comment No. 10 – *GE shall revise the truck traffic routes shown on Figure 7-1 based on recent modifications to the operating procedures for the On-Plant Consolidation Areas (OPCAs).*

GE Response – A revised Figure 7-1 is provided herein in Attachment G. In addition, GE understands that the Department of Transportation (DOT) shipping description to be used on each Hazardous Materials Bill of Lading (BOL) has changed. The new DOT shipping description to be used on the BOL will be: "RQ, Polychlorinated biphenyls, mixture, 9, UN 3432, PG 111, RQ."

EPA Comment No. 11 – *Attachment F of the Work Plan does not discuss inspections after severe storms. To make the Work Plan consistent with the CD (Section 2.2 of Attachment J to the Statement of Work), GE shall revise Attachment F to include inspections after sever storm events. EPA's position is that a storm event that records a 15 minute instantaneous peak of 3,500 cubic feet per second (cfs) or greater, as measured at the USGS Coltsville gauge, would constitute a severe storm event.*

GE Response – A revised Attachment F is provided herein in Attachment H.

EPA Comment No. 12 – *Regarding the ERE for GE-Owned Parcel I9-8-1, GE shall show on the ERE Plan, without limitation, the Engineered Barrier and groundwater response components such as monitoring wells, piping, and underground sheetpile walls.*

GE Response – Acknowledged. GE will show these items on the ERE Plan for Parcel I9-8-1.

In addition to the above comments, EPA's conditional approval letter directed GE to include in the Addendum a schedule for submitting a Supplemental Information Package. Consistent with EPA Comment No. 4, GE proposes to select a Remediation Contractor to address the properties west of Lyman Street by May 5, 2006. In accordance with the RD/RA Work Plan, GE will submit a Supplemental Information Package to EPA within 30 days after selecting the Remediation Contractor.

Please call Dick Gates if you have any questions about this Addendum.

Sincerely,

Andrew T. Silfer /BSS for

Andrew T. Silfer, P.E.
GE Project Coordinator

Attachments
V:\GE_Pittsfield_CD_Lyman_St\Reports and Presentations\Addendum to RD-RA WP\18262196LtrRpt.doc

cc: Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA*
Dean Tagliaferro, EPA
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Robert Bell, MDEP*
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Anna Symington, MDEP*
Nancy E. Harper, MA AG
Dale Young, MA EOEA*
Linda Palmieri, Weston (2 copies, CD)
Richard Nasman, Berkshire Gas
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Kevin Hylton, KHES, LLC
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Martin Booher, Esq.,
Leboeuf, Lamb, Greene & MacRae, L.L.P.
Charles J. Dooley, Western Mass. Electric Co.
Property Owner – Parcel I9-4-14 & -19
Property Owner – Parcel I9-4-25, -202, & -203
Property Owner – Parcel I9-4-201
Dorothy Mara, Esq., Hashim & Spinola
John Martin, Esq., Martin & Oliveira
Public Information Repositories
GE Internal Repository

**without attachments*

Attachments

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Attachment A

Revised Section 5.9 from the RD/RA Work Plan (Applicable or Relevant and Appropriate Requirements)

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5.9 Applicable or Relevant and Appropriate Requirements

The removal actions to be conducted at the Lyman Street Area will be subject to several ARARs. Attachment B to the SOW identifies the chemical-specific, action-specific, and location-specific ARARs for Removal Actions Outside the River. All of these activities will be performed within the 100-year floodplain of the Housatonic River. In these circumstances, the Lyman Street Area Removal Action is subject to the following ARARs identified in Attachment B to the SOW: the action-specific ARARs identified in Table 2, subsection B ("Soil Removal"), subsection C ("Surface Cover Activities"), subsections I and J (regarding consolidation of excavated soils at the OPCAs), and potentially subsection K ("Other"); and the location-specific ARARs identified in Table 3, subsection B ("Floodplains, Wetlands, and Banks"). If any free product, intact drums, and/or other materials that cannot be consolidated at the Building 71 OPCA are encountered during excavation activities, these materials will be removed for on-site storage at the GE Plant Area and subsequently disposed of off-site. Storage of any such materials on-site at the GE Plant Area prior to off-site disposal will be performed in accordance with the ARARs identified in Table 2, subsection H ("Temporary On-Site Storage of Free Product, Drums, and Equipment That Will Be Disposed of Off-Site") of Attachment B to the SOW will apply to such storage. In addition, the disposition of excavated materials at GE's Building 71 OPCA will be subject to the ARARs for consolidation at the OPCAs (set forth in Table 1 of the Detailed Work Plan for OPCAs).

A summary of the key ARARs that were considered with respect to the removal actions proposed herein, along with the associated project component(s) and means by which the ARAR is addressed by the design and implementation activities, is as follows:

ARAR	Associated Project Components	Means by Which ARAR Will Be Addressed
Toxic Substances Control Act (TSCA) Regulations (PCB Remediation Waste) (40 CFR 761.61)	• Soil removal • Surface cover activities	• EPA has determined that Removal Actions conducted in accordance with the CD and SOW will not pose an unreasonable risk of injury to health or the environment.
TSCA Regulations (Decontamination) (40 CFR 761.79)	• Soil removal (equipment cleaning)	• Will be attained by cleaning equipment as necessary in accordance with TSCA regulations (see Section 7.5.9).
Resource Conservation and Recovery Act (RCRA) Hazardous Waste Regulations (40 CFR 261.24)	• Soil removal	• Appendix IX+3 evaluations (Section 4 of Conceptual Work Plan).

ARAR	Associated Project Components	Means by Which ARAR Will Be Addressed
Clean Water Act NPDES Regulations (Stormwater Discharges) [40 CFR 122.44(k); 40 CFR 122.26(c)(ii)(C); 40 CFR 125.100-.104]	• Soil removal • Surface cover activities	• Implementation of erosion and sedimentation controls (Section 7.4.5).
Massachusetts Air Pollution Control Requirements (310 CMR 7.09)	• Soil removal • Surface cover activities	• Implementation of dust control measures (as necessary) and air monitoring (Sections 7.5.2 and 7.6, respectively).
TSCA Regulations (Storage for Disposal) (40 CFR 761.61; 40 CFR 761.65)	• Temporary storage of removed materials	• Temporary storage of free product and liquids in tanks or containers at GE's existing on-plant tank system or hazardous waste storage facility, both of which meet the long-term PCB storage requirements of TSCA. • Temporary storage of drums and other equipment in containers at GE's existing on-plant hazardous waste storage facility, which meets the long-term PCB storage requirements of TSCA.
TSCA Regulations (PCB Marking Requirements) (40 CFR 761.40)	• Temporary storage of removed materials	• Will be attained by marking PCB items in accordance with these requirements.
RCRA Hazardous Waste Regulations (Storage of Hazardous Waste) (40 CFR 264, Subparts I and J 40 CFR 262.34)	• Temporary storage of removed materials	• Temporary storage of free product and liquids in tanks or containers at GE's existing on-plant tank system or hazardous waste storage facility. • Temporary storage of drums and other equipment in containers at GE's existing on-plant hazardous waste storage facility. • Storage of materials in tanks will be limited to 90 days or less and will meet the substantive requirements for up to 90-day accumulation in tanks. • Materials in containers will be stored at GE's hazardous waste storage facility, which meets the requirements for long-term storage of hazardous waste in containers.
RCRA Hazardous Waste Management/Disposal Facilities Regulations (Preparedness and Prevention) (40 CFR 264, Subparts C)	• Temporary storage of removed materials	• GE's existing on-plant hazardous waste storage facility meets these requirements.
RCRA Hazardous Waste Management/Disposal Facilities Regulations (General) (40 CFR 264.13 - .19)	• Temporary storage of removed materials	• Operation of GE's existing on-plant hazardous waste storage facility meets these requirements.
RCRA Hazardous Waste Management/Disposal Facilities Regulations (Closure) (40 CFR 264.111 - .115)	• Temporary storage of removed materials	• Upon termination of operations, GE's existing on-plant hazardous waste storage facility will be closed in accordance with the substantive requirements of these regulations.

ARAR	Associated Project Components	Means by Which ARAR Will Be Addressed
Massachusetts Hazardous Waste Regulations (Storage of Hazardous Waste) (310 CMR 30.680, 30.690 310 CMR 30.340)	• Temporary storage of removed materials	• See discussion of Federal RCRA Hazardous Waste Regulations (Storage of Hazardous Waste) above.
Massachusetts Hazardous Waste Regulations (Closure) (310 CMR 30.580)	• Temporary storage of removed materials	• See discussion of Federal RCRA Hazardous Waste Regulations (Closure) above.
ARARs Relating to Disposition of Excavated Materials in OPCAs	• Permanent consolidation of removed materials at Building 71 OPCA	• Refer to August 25, 1999 letter from GE to EPA re: *Supplemental Addendum to June 1999 Detailed Work Plan*, for relevant ARARs relating to disposition of excavated material at the OPCAs and means of addressing such ARARs.
TSCA Spill Cleanup Policy (40 CFR 761, subpart G)	• New PCB spills (if any) during on-site activities	• GE will consider and address cleanup policy for any new PCB spills that occur during the work.
Executive Order for Floodplain Management [Exec. Order 11988 (1977); 40 CFR Part 6, App. A; 40 CFR 6.302(b)]	• Soil removal and surface cover activities in floodplain	• No practical alternative with less adverse impact on floodplain. • Implementation of erosion and sedimentation controls (Section 7.4.5). • Provision of compensatory flood storage capacity to offset loss in flood storage capacity (Section 5.8). • Restoration of habitat (Section 7.5.10).
Massachusetts Wetlands Protection Act and Regulations [MGL c. 131 §40; 310 CMR 10.53(3)(q); 310 CMR 10.54-.58]	• Soil removal • Placement of fill materials within 100-year floodplain • Natural Resource Restoration/Enhancement Activities	• No practical alternative with less adverse impact on resource areas. • All practical measures will be taken to minimize adverse impact on river. • Implementation of erosion and sedimentation controls (Section 7.4.5). • Natural Resource Restoration/ Enhancement Activities (Section 5.7). • Provision of compensatory flood storage capacity to offset loss in flood storage capacity (Section 5.8). • Restoration of disturbed vegetation (Section 7.5.10).

In addition to the requirements specified above, if any historic or prehistoric artifacts or sites or any threatened or endangered species or species of special concern are identified by GE during the course of field activities, or identified by EPA or the MDEP and communicated to GE, GE shall notify EPA and discuss with EPA the need for and scope of additional actions, if any, needed to protect such resources.

Attachment B

Revised Section 7.3 from the RD/RA Work Plan (Contractor Submittals)

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7.3 Contractor Submittals

Once selected, the Remediation Contractor will be required to provide certain pre-mobilization submittals to demonstrate that the Contractor: (a) has an adequate understanding of the scope of the Removal Action; (b) has developed a project-specific 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. Certain of those submittals relate to the manner in which the work activities will be implemented and, as such, will supplement the information and procedures presented in this plan. Those submittals include an Operations Plan, HASP, and Contingency Plan. Each of these submittals is further described below.

Operations Plan

The purpose of the Operations Plan is to summarize the materials, procedures, timelines, and controls that the Contractor intends to utilize during project activities. This plan will be prepared in consultation with GE and its Supervising Contractor and will include the following:

- List of equipment to be used on-site;
- Work Schedule;
- The Contractor's proposed plan for controlling vehicular and pedestrian traffic during the performance of construction activities;
- Proposed sheetpiling design (if applicable) or alternate excavation stabilization measures;
- The Contractor's qualifications package (if requested by GE);
- Stormwater (including run-on and run-off), erosion, noise, and dust control measures;
- The Contractor's proposed excavation approach;
- Materials handling and staging approach; and
- Equipment cleaning procedures.

HASP

The HASP will identify the Remediation Contractor's project-specific health and safety procedures, and will be developed to address the minimum requirements established in the POP and 29 CFR 1910 and 1926. The plan will address those activities to be undertaken by the Contractor and present required information including, but not limited to, the following (as applicable):

- 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;
- Personnel/equipment cleaning;
- Confined space entry;
- Construction safety procedures;
- Standard operating procedures and safety programs; and
- Material safety data sheets.

Contingency Plan

The Contingency Plan will set forth procedures for responding to emergency conditions or events that may occur during the performance of the Removal Action, and will include the following information:

- A spill prevention control and countermeasures plan for all materials brought on the work site;
- Emergency vehicular access/egress;
- Evacuation procedures of personnel from the work site;
- For work sites that include or are adjacent to a surface water drainage way, a flood control contingency plan identifying measures to protect the work site(s) and the waterway from impacts in the event of high water and/or flood conditions;
- A list of all contact personnel with phone numbers and procedures for notifying each;

- Routes to local hospitals; and
- Identification of responsible personnel who will be in a position at all times to receive incoming phone calls and to dispatch Contractor personnel and equipment in the event of an emergency situation.

In addition to the Contingency Plan requirements listed above, certain measures will be taken by GE and the Remediation Contractor in the event that any drums, capacitors, or other vessels are discovered during the course of remedial activities. These measures will include the following:

- Immediate notification of any such discovery to EPA and MDEP;
- Segregation, overpacking, characterization, and off-site disposal of any intact liquid-containing drums, capacitors, or other vessels; and
- Discussions with EPA regarding the need for and/or scope of follow-up activities, such as additional air monitoring, investigations, and response actions, if necessary.

The Remediation Contractor will also be required to prepare a submittal(s) specifying the sources and, if necessary, the corresponding analytical data for proposed backfill to be used during the performance of this project.

Once developed by the selected Remediation Contractor and approved by GE, each of the above-listed Contractor submittals will be submitted to EPA in a supplemental information package. In addition to these submittals, the Contractor is required to provide GE with various other submittals over the course of this project. The overall purpose of such submittals is to verify that the materials and procedures used in the construction activities are consistent with the design of the Removal Action. In accordance with the POP, all Contractor submittals will be tracked to confirm their receipt and approval. A copy of the Technical Submittal Register provided to the prospective Contractors as part of the RFP for this project is provided in Attachment D. (Please note that submittals required by GE but not subject to submittal to EPA as part of the supplemental information package have been shaded.)

Attachment C

Revised Technical Drawing 4 from the RD/RA Work Plan (Site Restoration Plan)

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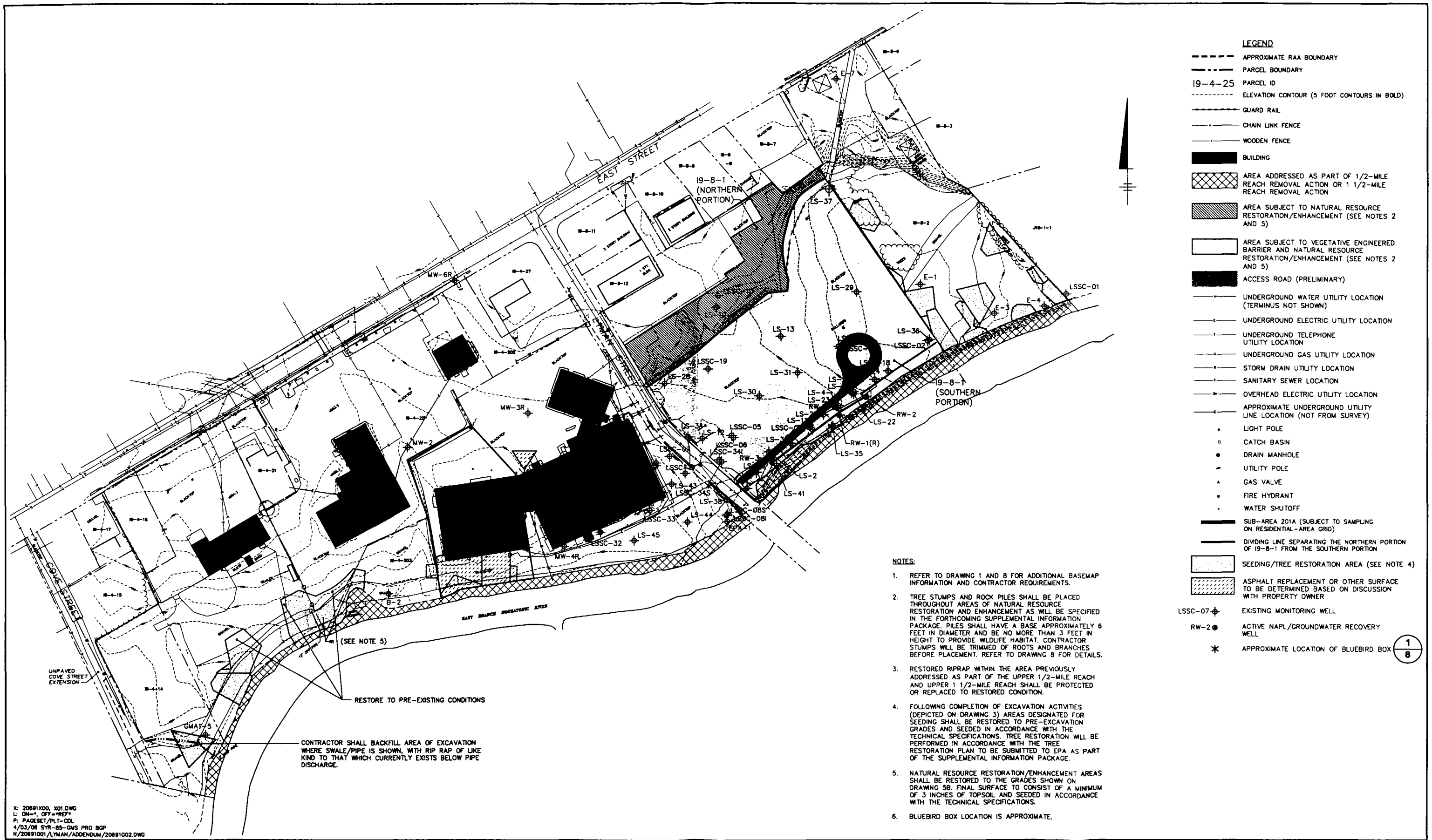

LEGEND

- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- 19-4-25 PARCEL ID
- ELEVATION CONTOUR (5 FOOT CONTOURS IN BOLD)
- GUARD RAIL
- CHAIN LINK FENCE
- WOODEN FENCE
- BUILDING
- AREA ADDRESSED AS PART OF 1/2-MILE REACH REMOVAL ACTION OR 1 1/2-MILE REACH REMOVAL ACTION
- AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT (SEE NOTES 2 AND 5)
- AREA SUBJECT TO VEGETATIVE ENGINEERED BARRIER AND NATURAL RESOURCE RESTORATION/ENHANCEMENT (SEE NOTES 2 AND 5)
- ACCESS ROAD (PRELIMINARY)
- UNDERGROUND WATER UTILITY LOCATION (TERMINUS NOT SHOWN)
- UNDERGROUND ELECTRIC UTILITY LOCATION
- UNDERGROUND TELEPHONE UTILITY LOCATION
- UNDERGROUND GAS UTILITY LOCATION
- STORM DRAIN UTILITY LOCATION
- SANITARY SEWER LOCATION
- OVERHEAD ELECTRIC UTILITY LOCATION
- APPROXIMATE UNDERGROUND UTILITY LINE LOCATION (NOT FROM SURVEY)
- LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- SUB-AREA 201A (SUBJECT TO SAMPLING ON RESIDENTIAL-AREA GRID)
- DIVIDING LINE SEPARATING THE NORTHERN PORTION OF 19-8-1 FROM THE SOUTHERN PORTION
- SEEDING/TREE RESTORATION AREA (SEE NOTE 4)
- ASPHALT REPLACEMENT OR OTHER SURFACE TO BE DETERMINED BASED ON DISCUSSION WITH PROPERTY OWNER
- LSSC-07 EXISTING MONITORING WELL
- RW-2 ACTIVE NAPL/GROUNDWATER RECOVERY WELL
- APPROXIMATE LOCATION OF BLUEBIRD BOX (1/8)

NOTES:

1. REFER TO DRAWING 1 AND 8 FOR ADDITIONAL BASEMAP INFORMATION AND CONTRACTOR REQUIREMENTS.
2. TREE STUMPS AND ROCK PILES SHALL BE PLACED THROUGHOUT AREAS OF NATURAL RESOURCE RESTORATION AND ENHANCEMENT AS WILL BE SPECIFIED IN THE FORTHCOMING SUPPLEMENTAL INFORMATION PACKAGE. PILES SHALL HAVE A BASE APPROXIMATELY 6 FEET IN DIAMETER AND BE NO MORE THAN 3 FEET IN HEIGHT TO PROVIDE WILDLIFE HABITAT. CONTRACTOR STUMPS WILL BE TRIMMED OF ROOTS AND BRANCHES BEFORE PLACEMENT. REFER TO DRAWING 8 FOR DETAILS.
3. RESTORED RIPRAP WITHIN THE AREA PREVIOUSLY ADDRESSED AS PART OF THE UPPER 1/2-MILE REACH AND UPPER 1 1/2-MILE REACH SHALL BE PROTECTED OR REPLACED TO RESTORED CONDITION.
4. FOLLOWING COMPLETION OF EXCAVATION ACTIVITIES (DEPICTED ON DRAWING 3) AREAS DESIGNATED FOR SEEDING SHALL BE RESTORED TO PRE-EXCAVATION GRADES AND SEEDED IN ACCORDANCE WITH THE TECHNICAL SPECIFICATIONS. TREE RESTORATION WILL BE PERFORMED IN ACCORDANCE WITH THE TREE RESTORATION PLAN TO BE SUBMITTED TO EPA AS PART OF THE SUPPLEMENTAL INFORMATION PACKAGE.
5. NATURAL RESOURCE RESTORATION/ENHANCEMENT AREAS SHALL BE RESTORED TO THE GRADES SHOWN ON DRAWING 5B. FINAL SURFACE TO CONSIST OF A MINIMUM OF 3 INCHES OF TOPSOIL AND SEEDED IN ACCORDANCE WITH THE TECHNICAL SPECIFICATIONS.
6. BLUEBIRD BOX LOCATION IS APPROXIMATE.

X: 20691X00, X01.DWG
L: ON=*, OFF=*REF*
P: PAGESET/PLT-CDL
4/03/06 SYR-85-GMS PRO BGP
N/20691001/LYMAN/ADDENDUM/20691G02.DWG

Graphic Scale
80' 0 80' 160'
1"=80'

THIS DRAWING WAS PREPARED AT THE SCALE INDICATED IN THE TITLE BLOCK. INACCURACIES IN THE STATED SCALE MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED. USE THE GRAPHIC SCALE BAR IN THE TITLE BLOCK TO DETERMINE THE ACTUAL SCALE OF THIS DRAWING.

Date	Revisions	Init

Professional Engineer's Name	JAMES M. NUSS
Professional Engineer's No.	38000
State	MA
Date Signed	
Project Mgr.	DAJ
Designed by	RWP
Drawn by	GMS

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GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
ADDENDUM TO RD/RA WORK PLAN FOR THE LYMAN STREET AREA

SITE RESTORATION PLAN

TECHNICAL DRAWINGS

BBL Project No.	206.91
Date	MARCH 2006

Blasland, Bouck & Lee, Inc.
Corporate Headquarters
6723 Towpath Road
Syracuse, NY 13214
315-446-9120

4

Attachment D

Revised Section 8.4 from the RD/RA Work Plan (Additional Activities Relating to Properties with Conditional Solutions)

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8.4 Additional Activities Relating to Properties with Conditional Solutions

In addition to the Post-Removal Site Control activities mentioned above and further described in Attachment E, GE will undertake activities to comply with the requirements of Paragraphs 34 through 38 of the CD with respect to each property at which a Conditional Solution is implemented. These activities will include the following:

(1) After completion of all on-site removal activities at this RAA, GE will provide a notification to the owner of each property at which a Conditional Solution has been implemented, describing the terms of the Conditional Solution under the CD (including the requirements applicable to GE and the owner regarding future remediation activities at the property) and describing the residual contamination at the property. In addition, GE will provide such a notification to the holders of any easements or other encumbrances on the property.

(2) In accordance with Paragraph 36 of the CD, on an annual basis, GE will review the most recent property records to determine whether there has been a change in ownership of the property; and, if there has been a change in ownership, GE will provide notice to the new owner regarding the same items described in # 1 above.

(3) In accordance with Paragraph 38 and Section III of Appendix Q to the CD, GE will perform an annual inspection of the property to determine whether there is evidence, based on visual observation, that any of the following have occurred since implementation of the Removal Action or since the last inspection: (a) any change in activities and uses of the property that would be potentially inconsistent with the land use for which the Conditional Solution was implemented; (b) installation of a new utility or replacement of an existing utility that involved disturbance of soil; (c) any excavations or other activities that might involve the disturbance of ten (10) cubic yards of soil, or greater, regardless of depth; and (d) any reduction in surface grade due to activities listed in (b) and (c) above. Following such inspection, GE will prepare and submit a report on the inspection to EPA and MDEP. More details regarding the annual inspections and reports, including an annual inspection checklist to be used for the inspections and reporting, will be provided in the Final Completion Report on this Removal Action.

Attachment E

Revised Section 10.0 of Attachment E from the RD/RA Work Plan (Ambient Air Monitoring Program)

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10.0 ACTION LEVELS

10.1 PCBs

The notification and action levels for PCB concentrations in ambient air are 0.05 $\mu g/m^3$ (24-hour average) and 0.1 $\mu g/m^3$ (24-hour average), respectively. These are the same levels established by EPA for the other remediation activities in Pittsfield.

If the 0.05 $\mu g/m^3$ notification level is exceeded, GE will notify EPA promptly, but no later than 24 hours after receipt of the data showing such an exceedance, and will implement additional response actions. The actions to be considered will include those previously implemented by GE at other areas at the GE-Pittsfield/Housatonic River Site (e.g., increased frequency of monitoring, establishment of additional monitoring locations, increased use of dust suppression measures, modifications to dust-producing activities).

If the action level of 0.1 $\mu g/m^3$ is exceeded, GE will notify EPA immediately upon receipt of the data showing such an exceedance, and will temporarily cease ongoing excavation activities and discuss with EPA the need for and type of short-term actions to address the exceedance. In addition, GE will evaluate the need for additional engineering controls, discuss that evaluation with EPA, and if warranted, propose such controls. EPA approval of appropriate response actions and engineering controls, if proposed, will be required before GE resumes excavation activities.

10.2 Particulate Matter

For each day of monitoring, the particulate data from the on-site monitors will initially be compared with the data from the background monitor. If the average 10-hour PM_{10} concentration at any on-site monitor exceeds the average concentration at the background monitor, the on-site concentrations will then be compared to the notification level of 120 $\mu g/m^3$ – which represents 80 percent of the current 24-hour National Ambient Air Quality Standard (NAAQS) for PM_{10}, which is 150 $\mu g/m^3$. This notification level has been selected to allow notice to GE before concentrations reach the level of the 24-hour NAAQS (the action level).

Any exceedance of the notification level will be reported to EPA as soon as practicable following receipt of data showing the exceedance, and GE will take appropriate steps to prevent an exceedance of the action level and will discuss with EPA the need for and type of additional response measures. The actions to be considered in these circumstances will include the same types of measures listed above for exceedances of the notification level for PCBs or other appropriate measures.

In the event that any 10-hour average PM_{10} concentration at an on-site monitor exceeds the level of the NAAQS for PM_{10} (the action level), GE will: (a) immediately report such exceedance to EPA following receipt of data showing the exceedance; (b) temporarily cease ongoing excavation activities; and (c) discuss with EPA appropriate immediate or short-term response actions to address the exceedance. In addition, GE will evaluate the cause of the exceedance and the need for additional engineering controls, discuss that evaluation with EPA, and propose to EPA appropriate engineering controls or other corrective actions. EPA approval of appropriate response actions and engineering controls, if proposed, will be required before GE resumes excavation activities.

Attachment F

Revised Technical Drawing 3 from the RD/RA Work Plan (Excavation Limits)

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LEGEND:

- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- 19-4-25 PARCEL ID
- ELEVATION CONTOUR (5 FOOT CONTOURS IN BOLD)
- GUARD RAIL
- CHAIN LINK FENCE
- WOODEN FENCE
- BUILDING
- AREA ADDRESSED AS PART OF 1/2-MILE REACH REMOVAL ACTION OR 1 1/2-MILE REACH REMOVAL ACTION
- AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT
- AREA SUBJECT TO INSTALLATION OF VEGETATIVE ENGINEERED BARRIER AND NATURAL RESOURCE RESTORATION/ ENHANCEMENT
- UNDERGROUND WATER UTILITY LOCATION (TERMINUS NOT SHOWN)
- UNDERGROUND ELECTRIC UTILITY LOCATION
- UNDERGROUND TELEPHONE UTILITY LOCATION
- UNDERGROUND GAS UTILITY LOCATION
- STORM DRAIN UTILITY LOCATION
- SANITARY SEWER LOCATION
- OVERHEAD ELECTRIC UTILITY LOCATION
- APPROXIMATE UNDERGROUND UTILITY LINE LOCATION (NOT FROM SURVEY)
- LIGHT POLE
- CATCH BASIN
- DRAIN MANHOLE
- UTILITY POLE
- GAS VALVE
- FIRE HYDRANT
- WATER SHUTOFF
- 12' AREA OF REMOVAL AND DEPTH OF EXCAVATION (SEE NOTE 2)
- ELEV. 981' AREA OF REMOVAL AND REQUIRED ELEVATION OF EXCAVATION (SEE NOTE 2)
- LSSC-07 EXISTING MONITORING WELL
- RW-2 ACTIVE NAPL/GROUNDWATER RECOVERY WELL

NOTES:

1. REFER TO DRAWING 1 AND 8 FOR ADDITIONAL BASEMAP INFORMATION AND CONTRACTOR REQUIREMENTS.
2. EXCAVATIONS SHALL BE FULLY COMPLETED TO DEPTH OR ELEVATION INDICATED WITHIN LIMITS SHOWN. ALL EXCAVATED MATERIALS TO BE DISPOSED OF AT THE BUILDING 71 OPCA.
3. RESTORED RIPRAP WITHIN THE AREA PREVIOUSLY ADDRESSED AS PART OF THE UPPER 1/2-MILE REACH AND UPPER 1 1/2-MILE REACH SHALL BE PROTECTED OR REPLACED TO RESTORED CONDITION.
4. MONITORING WELLS TO BE PROPOSED FOR DECOMMISSIONING WILL BE IDENTIFIED IN THE SUBSEQUENT PLANT 1 GROUNDWATER MANAGEMENT AREA NAPL MONITORING REPORT FOR SPRING 2005. MONITORING WELLS NOT SUBJECT TO DECOMMISSIONING SHALL BE PROTECTED DURING REMEDIAL ACTIVITIES AND EXTENDED, IF NECESSARY, AS SHOWN ON DETAIL 3, DRAWING 9. ALL OTHER MONITORING WELLS SHALL BE DECOMMISSIONED AND ABANDONED.
5. OTHER SOIL EXCAVATIONS WILL BE NECESSARY TO FACILITATE THE INSTALLATION OF THE ENGINEERED BARRIER. SUCH EXCAVATIONS ARE NOT DEPICTED ON THIS FIGURE BUT ARE ADDRESSED IN TECHNICAL DRAWINGS 5A, 5B, 6 AND 8.
6. CONTRACTOR SHALL TAKE PRECAUTIONARY MEASURES IN THE VICINITY OF UTILITY POLES THROUGHOUT THE IMPLEMENTATION OF REMEDIAL ACTIVITIES.

X: 20691X00, X01.DWG
L: ON=*, OFF=*REF*, BARSHADE, REMOVALBORY
P: PAGESET/PLT-CDL
4/03/08 SYR-85-GMS PRO BGP
N/20691001/LYMAN/ADDENDUM/20691G01.DWG

Graphic Scale
80' 0 80' 160'
1"=80'

THIS DRAWING WAS PREPARED AT THE SCALE INDICATED IN THE TITLE BLOCK. INACCURACIES IN THE STATED SCALE MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED. USE THE GRAPHIC SCALE BAR IN THE TITLE BLOCK TO DETERMINE THE ACTUAL SCALE OF THIS DRAWING.

No.	Date	Revisions	Init

Professional Engineer's Name	JAMES M. NUSS	
Professional Engineer's No.	38000	
State	MA	Date Signed
Project Mgr.	Designed by	Drawn by
DAJ	RWP	GMS

BBL BLASLAND, BOUCK & LEE, INC. engineers, scientists, economists

GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS

ADDENDUM TO RD/RA WORK PLAN FOR THE LYMAN STREET AREA

EXCAVATION LIMITS

TECHNICAL DRAWINGS

BBL Project No. 206.91

Date MARCH 2006

Blasland, Bouck & Lee, Inc.
Corporate Headquarters
6723 Towpath Road
Syracuse, NY 13214
315-446-9120

3

Attachment G

Revised Figure 7-1 from the RD/RA Work Plan (Proposed Primary and Secondary Travel Routes for Excavated Materials to the Building 71 OPCA)

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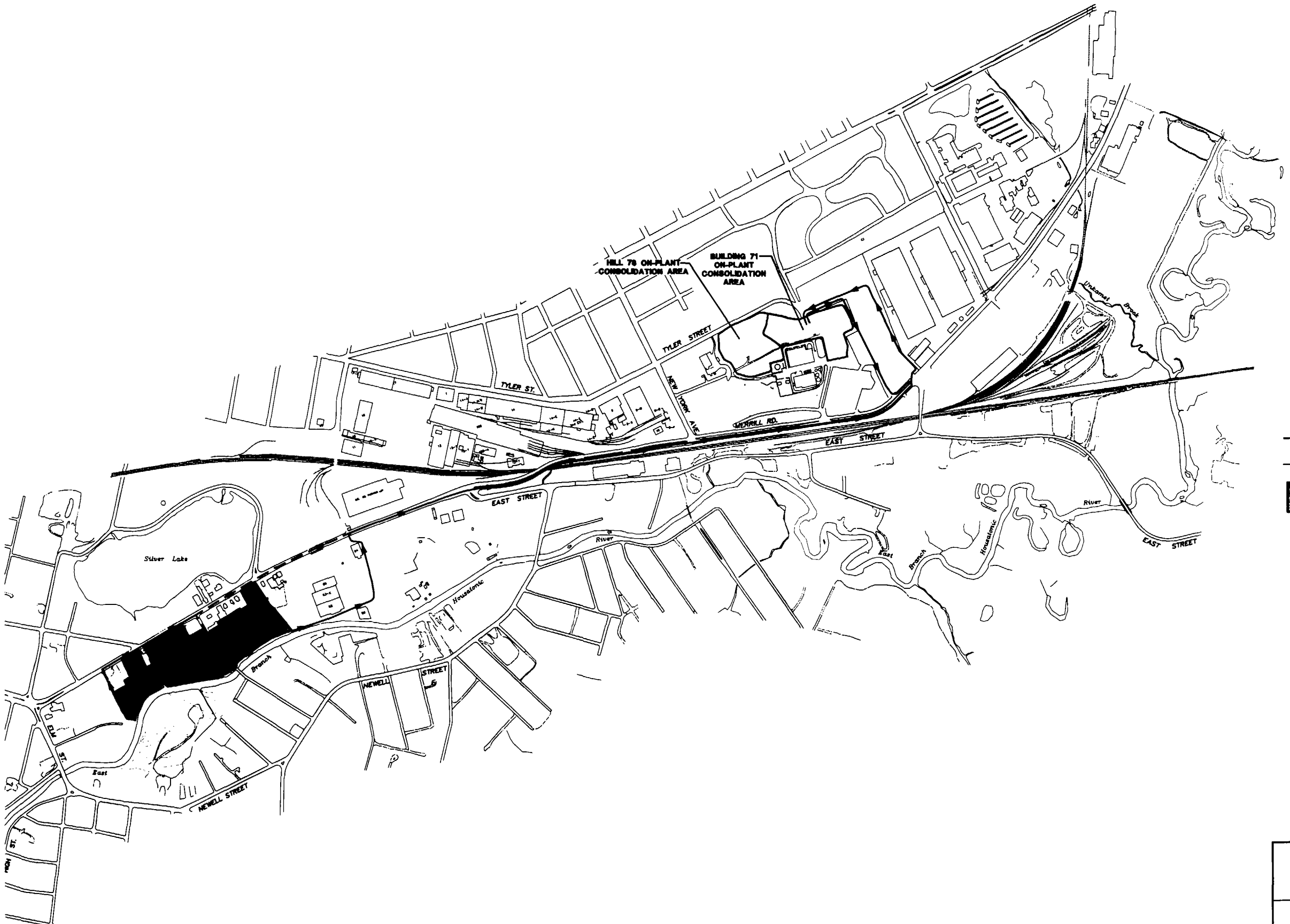
Original includes color coding.



LEGEND:

- PRIMARY TRAVEL ROUTE TO BUILDING 71 OPCA
- SECONDARY TRAVEL ROUTE TO BUILDING 71 OPCA
- LYMAN STREET REMOVAL ACTION AREA

NOTES:

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

0 500' 1000'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
ADDENDUM TO FINAL RD/RA WORK PLAN
FOR THE LYMAN STREET AREA

PROPOSED PRIMARY AND SECONDARY TRAVEL ROUTES FOR EXCAVATED MATERIALS TO THE BUILDING 71 OPCA

BBL BLASLAND, BOUCK & LEE, INC. engineers, scientists, economists

FIGURE 7-1

X: 20691X01.DWG
L: ON=*;OFF=*REF,*FLOOD,*MAP-255
P: PAGESET-DL291
4/03/06 SYR-85-RCB PRO BGP
N/20691002/20691B01.DWG

Attachment H

Revised Attachment F from the RD/RA Work Plan (Post Removal Site Control/Restoration Project Monitoring and Maintenance Plan)

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Attachment F - Post-Removal Site Control/ Restoration Project Monitoring and Maintenance Plan

In accordance with Section 3.7 of the *Statement of Work for Removal Actions Outside the River* (SOW), which is Appendix E of the CD, and as required in Technical Attachments I and J of the SOW, this Post-Removal Site Control/Restoration Project Monitoring and Maintenance Plan describes the future inspection, maintenance, and repair activities (I/M activities) to be conducted at the Lyman Street Area. The Performance Standards and other requirements set forth in Section 8 of Technical Attachment I to the SOW pertain to the monitoring and maintenance activities associated with natural resource restoration/enhancement activities to be conducted by GE within the Lyman Street Parking Lot on the southern portion of Parcel I9-8-1 and certain other areas at the northern portion of that parcel. Technical Attachment J of the SOW describes the future inspection, maintenance, and repair activities (I/M activities) to be conducted by GE at all areas where soil removal and replacement activities will be performed (Parcels I9-4-14, I9-4-19, I9-4-25/I9-4-202, I9-4-203, I9-4-201, I9-8-1, I9-8-2, Sub-Area 201A, and Recreational Area R1) and the area subject to the installation of the vegetated engineered barrier. The scope of these activities for the Lyman Street Area is further described in the sections below.

General Semi-Annual Inspection Activities

The I/M activities on all restored areas will be conducted on a semi-annual basis and will consist of the activities specified in Technical Attachment J of the SOW and further described below. Section 2.1.1 of Attachment J provides that I/M activities be conducted semiannually at engineered barriers (vegetated). Section 2.3 of that same attachment requires that I/M activities are to be conducted for vegetated covers in areas of soil removal and specifies that these activities are to be the same as those discussed for soil covers within non-inundated areas (as specified in Section 2.2 of Attachment J). These I/M activities for the Lyman Street Area are as follows.

GE will initiate post-construction inspections of the restored surfaces at the Lyman Street Area following completion of the construction activities. Such inspections will be performed for both the engineered barriers and the other restored areas.

For the engineered barrier areas, the first inspection will be performed approximately one month after completion of the construction activities to visually identify potential problems associated with such areas, such as settlement or the presence of stressed vegetation. Thereafter, the engineered barrier areas will be inspected approximately every 6 months (until EPA approves a different frequency for such inspections). These inspections will be performed by GE (or a designated GE representative) to assess the integrity of the engineered barriers (i.e., to identify deficiencies that would affect the integrity of the barriers).

Vegetative engineered barriers will be visually inspected for the following conditions as they would affect the integrity of the barriers: (a) evidence of topsoil erosion; (b) establishment and coverage of vegetation (e.g., bare or sparsely vegetated areas); (c) deficiencies in the soil layer overlying the synthetic cover components (e.g., excessive erosion, surface water ponding, depressions, exposed synthetic cover components, vehicle ruts, or other abnormalities); (d) damage to synthetic cover components; (e) uneven settlement relative to surrounding areas; (f) the proper functioning of any associated surface water diversions; and (g) overall integrity (including animal burrows, unauthorized excavation, or other conditions that could jeopardize the integrity of the barriers).

For other backfilled/restored areas, the first inspection will likewise be performed approximately one month after completion of construction activities. Thereafter, these areas will be inspected every 6 months for the first year after restoration and annually thereafter (subject to subsequent EPA approval of a different frequency). At a minimum, these inspections will include visual observations of the following: (a) erosion controls to verify their continued effectiveness until such time vegetation is sufficiently established; (b) any areas where excessive settlement has occurred relative to the surrounding areas; (c) any drainage or growth problems due to possible over-compaction of the backfill materials; and (d) other conditions that could jeopardize the performance of the removal actions as designed. Inspections are anticipated to occur in May and October of each year to ensure that the vegetation is growing as anticipated and is providing the desired degree of erosion control.

Additional inspections of the backfilled/restored areas will be conducted following severe storms to verify that those areas have not sustained significant damage. For this purpose, a "severe storm" is defined as one in which a 15-minute instantaneous peak flow of 3,500 cubic feet per second (cfs) or greater is measured on the Housatonic River at the U.S. Geological Survey Coltsville gauge.

conduct replanting activities, the timing for monitoring of that area will be restarted following replanting activities. GE will not be required to replant an area if the loss of vegetation or growth failure is caused solely by actions of a third party (excluding a GE contractor).

During each of the monitoring visits, GE will also inspect for the presence of invasive species within the Lyman Street Parking Area. Invasive species of concern are Amur honeysuckle, Autumn olive, Black locust, Black swallow-wort, Common barberry, Common buckthorn, Garlic mustard, Glossy buckthorn, Goutweed or Bishop's weed, Japanese barberry, Japanese honeysuckle, Japanese knotweed, Morrow's honeysuckle, Morrow's X Tatarian honeysuckle (hybrid), Multiflora rose, Norway maple, Oriental bittersweet, Phragmites - Reed grass, Porcelain berry, Purple loosestrife, Russian olive, Tatarian honeysuckle, and Yellow iris. GE will ensure that no greater than 5% of any area within the Lyman Street Parking Lot is covered with invasive species. Invasive species will be removed in an appropriate manner.

GE will prevent shrub and tree growth within the Lyman Street Parking Area through various means (i.e., periodic mowing, shrub/tree removal, etc.). Mowing will be conducted once every one to three years, and will occur no earlier in the year than August 1.

GE will inspect the bluebird box to ensure that it has not become damaged. If the damage is sufficient to render the box uninhabitable by bluebirds, then it will be replaced. Rock piles and stumps will be inspected to ensure that major damage from acts such as vandalism have not leveled or relocated the structures. Due to the use of these structures by small mammals for the creation of dens, GE will only conduct maintenance upon the rock piles and stumps (e.g., restacking the rock piles and/or reorienting the stumps) in the case of catastrophic damage to the structures.

Reporting

Reports on the overall inspection activity will be prepared after each inspection. These reports will be submitted to EPA and will document I/M activities performed since submittal of the previous inspection report. As required by Attachment J of the SOW, these reports will include the following information (as relevant):

- Description of the type and frequency of inspection and/or monitoring activities conducted;

- Description of any significant modifications to the inspection and/or monitoring program made since submittal of the preceding monitoring report;
- Description of any conditions or problems noted during the inspection and/or monitoring period which are affecting or may affect the completed remediation;
- Description of any measures taken to correct conditions affecting the performance of the response action;
- Results of any sampling analyses and screening conducted as part of the inspection and/or monitoring program; and

Description of any measures that may need to be performed to correct any conditions affecting the completed response actions.

With regard to the inspections of the resource restoration and enhancement activities, GE will prepare and submit to the Trustees an event-specific report on these inspection, monitoring, and maintenance activities, including the results of the inspections and any maintenance activities performed. The report will be prepared using field notes and other information collected during each of the monitoring visits. The report will include photographic documentation of the conditions of the Lyman Street Parking Lot. Such a report will be submitted to the Trustees, with copies to U.S. Environmental Protection Agency (EPA) and Massachusetts Department of Environmental Protection (MDEP), within 90 days of the inspection.

Contact Information

In accordance with Section 2.0 of Technical Attachment J of the SOW, provided below is the name and contact information for the person who will be responsible for conducting inspection and monitoring activities at the Lyman Street Area. The individual shown below may change during the period that these activities are conducted.

Name	Company/Entity	Telephone Number
Richard W. Gates	General Electric Company	(413) 448-5909

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