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

Transmitted Via Federal Express

August 20, 2002

Mr. Bryan Olson
EPA Project Coordinator
U.S. Environmental Protection Agency
EPA New England
One Congress Street, Suite 100
Boston, Massachusetts 02114-2023

Re: GE-Pittsfield/Housatonic River Site
Newell Street Area I (GECD440)
Revised Proposal for Supplemental Pre-Design Investigations

Dear Mr. Olson:

On July 3, 2002, the General Electric Company (GE) submitted a *Proposal for Supplemental Pre-Design Investigations* (Supplemental Proposal) for Newell Street Area I to the U.S. Environmental Protection Agency (EPA). In that document, GE proposed additional sampling activities to supplement and/or complete evaluations of the need for and scope of remedial actions to address polychlorinated biphenyls (PCBs) and/or non-PCB constituents, as presented in the January 2002 *Conceptual Removal Design/Removal Action Work Plan for Newell Street Area I* (Conceptual Work Plan). Specifically, the Supplemental Proposal combined the soil sampling activities proposed in Section 5 of the Work Plan with additional soil sampling activities based on EPA comments on the Work Plan (provided in a letter to GE dated May 24, 2002) and subsequent discussions between GE and EPA.

In the Supplemental Proposal, GE provided the rationale for the proposed additional investigation activities for PCBs and other constituents listed in Appendix IX of 40 CFR 264 (excluding pesticides and herbicides), plus benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine (Appendix IX+3). Also included in that proposal were several figures and tables containing specific details about the proposed constituent analyses and the proposed sample locations. By letter of August 5, 2002, EPA provided conditional approval of the Supplemental Proposal. That letter required certain modifications to the scope of sampling and directed GE to submit a Revised Supplemental Proposal to EPA.

Based on EPA's conditional approval letter and other discussions with EPA, this letter presents GE's Revised Proposal for Supplemental Pre-Design Investigations at Newell Street Area I. Specifically, this letter describes the modifications to the proposed sample locations and constituent analyses presented in the Supplemental Proposal. In support of this document, GE is re-submitting Figure 1 (proposed PCB sample locations), which is unchanged from the Supplemental Proposal, and has revised Figures 2 through 5 of that Proposal (proposed Appendix IX+3 sample locations for the 0- to 1-foot, 1- to 3-foot, 3- to 6-foot, and 6- to 15-foot depth increments) and included those revised figures with this submittal. In addition, based on the extensive proposal and review process, GE has prepared a new table, Table 1 hereto, which summarizes the proposed sample locations and corresponding constituent analyses for each property within this Removal Action Area (RAA).

The remainder of this letter first discusses an issue that affects several properties at Newell Street Area I – namely, the additional sampling to address the extent of elevated lead concentrations in the northwest portion of this RAA. It then describes the proposed modifications to sample locations and constituent analyses and summarizes the revised supplemental sampling for each individual parcel at this RAA. In the latter sections, as in the Supplemental Proposal, the term "Select VOCs, SVOCs" refers to certain volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) for which the prior analytical results were non-detect but which had elevated detection limits and are thus being re-analyzed in additional samples. These specific constituents are identified, for each sample to be analyzed for this purpose, in Table 1.

LEAD DELINEATION IN NORTHWEST PORTION OF NEWELL STREET AREA I

Prior sampling at this RAA has revealed the presence of elevated lead concentrations in a number of samples in the northwest section of the RAA, encompassing portions of Parcels J9-23-13, J9-23-16, and J9-23-17. Comment 2 of EPA's August 5, 2002 letter directed GE to revise its approach for delineating areas having elevated lead concentrations in this portion of the RAA, taking into account certain specific comments provided by EPA. GE's proposed revised approach for delineating the horizontal extent of elevated lead concentrations in this area is described below for each relevant depth increment. In addition, GE will collect the samples identified in EPA's August 5, 2002 letter (Comment 2b) to delineate the vertical extent of elevated lead concentrations.

0- to 1-Foot Depth Increment: Based on both the Supplemental Proposal and EPA's August 5, 2002 letter (Comment 2a), there are five prior sample locations that showed elevated concentrations of lead in the uppermost depth increment and for which lead delineation is thus needed in the 0- to 1-foot depth. These consist of the samples from locations J9-23-13-D5 (0-1'), J9-23-16-QP-23 (0-4'), J9-23-16-QP-25 (0-0.5'), J9-23-16-QP-26 (0-0.5'), and J9-23-17-IA-93 (0-1'). These sample locations are all situated within the same general area, as shown on Figure 2. Moreover, all these locations are well within the area for which GE has proposed a minimum of 1-foot soil removal to address PCBs, as shown on Figure 3-1 of the Conceptual Work Plan. In these circumstances, GE does not believe that it makes sense to attempt to delineate the extent of elevated lead concentrations in the top foot of soil around each of these locations individually (since the entire top foot of soil in this area will be removed anyway). Rather, GE proposes to conduct additional surface soil sampling for lead near the edges of the proposed PCB removal area in order to assess whether the extent of elevated lead concentrations extend beyond the proposed PCB soil removal limits. There are a number of existing surface soil samples near (or relatively near) the edges of the proposed PCB removal area that have previously been analyzed for lead and thus can be used for this purpose. These include the samples from MM-SS-1 (0-1'), SLO466 (0-0.5'), D9 (0-1'), IA-25 (0-0.5'), and IA-96 (0-1'), as shown on Figure 2. To supplement these existing data, GE proposes to collect additional 0- to 1-foot soil samples for lead analysis from the following locations near the edges of the proposed PCB removal area: MM-14, MM-15, MM-6(BBL), SLO102, QP-14, QP-35, IA-94, and IA-97. These locations (which have been revised from the lead delineation locations proposed for this depth interval in the Supplemental Proposal) are shown on Figure 2.

1- to 3-Foot Depth Increment: There are three prior samples from this area with elevated lead concentrations that require further horizontal delineation for lead in the 1- to 3-foot depth increment. These are samples from locations D4 (1-3'), D6 (1-3'), and QP-23 (0-4'), as shown on Figure 3. To delineate the extent of elevated lead concentrations for these locations in the 1- to 3-foot depth increment, GE proposes to collect soil samples for lead analysis from the 1- to 3-foot depth at the following locations, as shown on Figure 3: MM-13, MM-14, MM-15, MM-16, QP-19, QP-26, QP-31, QP-33, QP-34, QP-35, and IA-40.

3- to 6-Foot Depth Increment: There are five prior samples (from four locations) that include this depth interval in which elevated lead concentrations were previously detected and which thus require horizontal delineation for lead in the 3- to 6-foot depth. These are the samples from locations QP-22 (4-8'), QP-23 (0-4' & 4-8'), QP-27 (4-6'), and IA-98 (3-6'), as shown on Figure 4. To delineate the extent of elevated lead

concentrations in this depth increment, GE proposes to collect soil samples for lead analysis from the 3- to 6-foot depth increment at the following locations, as shown on Figure 4: QP-33, QP-34, QP-35, IA-40, IA-97, IA-101, IA-110, and RV-2.

6- to 15-Foot Depth Increment: There are five prior samples (from three locations) that include all or a portion of this depth interval in which elevated lead concentrations were previously detected and which thus require horizontal delineation for lead in the 6- to 15-foot depth. These are the samples from locations QP-22 (4-8' & 8-12'), QP-23 (4-8' & 8-12'), and IA-98 (6-15'), as shown on Figure 5. To delineate the extent of elevated lead concentrations in all or portions of this depth increment, GE proposes to collect the following samples for lead analysis: 6- to 10-foot soil samples from locations QP-33, QP-34, QP-35, and IA-40 (as specified in Comment 2.c of EPA's August 5, 2002 letter); and 6- to 15-foot samples from locations IA-97, IA-101, IA-110, and RV-2. These sample locations are shown on Figure 5.

PARCEL-BY-PARCEL SAMPLING SUMMARY

PARCEL J9-23-12

Supplemental PCB Soil Sampling: Modifications to the quantity or locations of the PCB samples included in the Supplemental Proposal are not required. Therefore, consistent with that document, GE proposes to collect the following samples for analysis of PCBs, as presented on Figure 1:

Sample ID	Depth Increment
J9-23-12-SLO083	10-15'
J9-23-12-SLO466	3-6', 6-10', 10-15'

Supplemental Appendix IX+3 Soil Sampling: As discussed above, to assist in the delineation of the elevated lead concentrations in the 0- to 1-foot depth increment, GE proposes to collect an additional sample for lead analysis at location SLO102, which is located on this parcel. In addition, Comment 5 of EPA's August 5, 2002 comment letter indicates that GE proposed the collection of additional Appendix IX+3 samples at locations C8 and C14. However, consistent with the Supplemental Proposal and based on recent discussions between GE and EPA, GE will, instead, collect Appendix IX+3 samples from the 1- to 3-foot depth increment at locations SLO466 and C12. GE will also advance the soil borings at both of these locations to enable EPA to collect samples from the 3- to 6-foot and 6- to 15-foot depth increments. Including the samples described above, the Appendix IX+3 sample locations for Parcel J9-23-12 are presented on Figures 2 and 3 and will consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-12-C12	0-1'	Detection Limits	Select VOCs, SVOCs
J9-23-12-C12	1-3'*	Characterization	SVOCs, Dioxins/Furans, Inorganics
J9-23-12-SLO083	1-3'*	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
J9-23-12-SLO093	0-1'	Detection Limits	Select VOCs, SVOCs
J9-23-12-SLO102	0-1'	Delineation	Lead
J9-23-12-SLO466	1-3'*	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics

* GE will extend the soil boring at this location beyond the specified interval to enable EPA to collect samples from the 3- to 6-foot and 6- to 15-foot depth increments.

PARCEL J9-23-13

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: As discussed above, in response to Comment 2 of EPA's August 5, 2002 letter, GE proposes to collect a number of samples at this property to delineate the extent of elevated lead concentrations in this area. These will include horizontal delineation samples at locations MM-6(BBL), MM-13, MM-14, MM-15, and MM-16 and vertical delineation samples at locations D4 and D5 (as specified in Comment 2b of EPA's August 5 letter). In total, the supplemental Appendix IX+3 sample locations for Parcel J9-23-13 are presented on Figures 2 through 4 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-13-D4	3-6'	Delineation	Lead
J9-23-13-D5	1-3'	Delineation	Lead
J9-23-13-MM-6(BBL)	0-1'	Delineation	Lead
J9-23-13-MM-13	1-3'	Delineation	Lead
J9-23-13-MM-14	0-1' & 1-3'	Delineation	Lead
J9-23-13-MM-15	0-1' & 1-3'	Delineation	Lead
J9-23-13-MM-16	1-3'	Delineation	Lead

PARCEL J9-23-16

Supplemental PCB Soil Sampling: Modifications to the quantity or locations of the PCB samples included in the Supplemental Proposal are not required. However, consistent with Comment 4 of EPA's August 5, 2002 letter, should access restrictions prevent the performance of the proposed soil boring at location H6, GE will advance the boring outside the northern wall of the building along grid line "6". In summary, GE proposes to collect the following samples for analysis of PCBs, as presented on Figure 1:

Sample ID	Depth Increment
J9-23-16-H6 (or alternate)	0-1', 1-3', 3-6', 6-10' & 10-15'
J9-23-16-I6	0-1'

Supplemental Appendix IX+3 Soil Sampling: As discussed above, in response to Comment 2 of EPA's August 5, 2002 letter, GE proposes to collect a number of samples at this property to delineate the extent of elevated lead concentrations. In addition, in accordance with Comment 5 of EPA's August 5, 2002 letter, GE will advance the soil borings at locations QP-33, QP-34, and QP-35 to enable EPA to collect samples from the 10- to 15-foot depth increment. Including the samples described above, the Appendix IX+3 sample locations for Parcel J9-23-16 are presented on Figures 2 through 5 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-16-D6	3-6'	Delineation	Lead
J9-23-16-H6	6-15'	Characterization	VOCs*, SVOCs, Dioxins/Furans, Inorganics
J9-23-16-QP-14	0-1'	Delineation	Lead
J9-23-16-QP-19	1-3'	Delineation	Lead
J9-23-16-QP-26	1-3'	Delineation	Lead

Sample ID	Depth Increment	Purpose	Analyses
J9-23-16-QP-27	4-6’	Detection Limits	Select SVOCs
J9-23-16-QP-31	1-3’	Delineation	Lead
J9-23-16-QP-33	1-3’, 3-6’, 6-10’**	Delineation	Lead
J9-23-16-QP-34	1-3’, 3-6’, 6-10’**	Delineation	Lead
J9-23-16-QP-35	0-1’, 1-3’, 3-6’, 6-10’**	Delineation	Lead

* The 2-foot sample increment with the highest PID reading will be submitted for VOC analysis.
** GE will extend the soil boring at this location beyond the specified intervals to enable EPA to collect samples from the 10- to 15-foot depth increment.

It should be noted, that if it is not feasible to install a soil boring at location H6 (which is inside the building), then the 6- to 15-foot sample proposed for that location will be collected from the same replacement soil boring outside the building at which the required PCB samples will be collected.

PARCEL J9-23-17

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: As discussed above, in response to Comment 2 of EPA’s August 5, 2002 letter, GE proposes to collect a number of samples at this property to delineate the extent of elevated lead concentrations. In addition, in accordance with Comment 5 of EPA’s August 5, 2002 letter, GE will advance the soil boring at location IA-40 to enable EPA to collect a sample from the 10- to 15-foot depth increment. Including the samples described above, the Appendix IX+3 sample locations for Parcel J9-23-17 are presented on Figures 2 through 5 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-17-IA-40	1-3’, 3-6’, 6-10’*	Delineation	Lead
J9-23-17-IA-63	0-1’	Characterization	Dioxins/Furans
J9-23-17-IA-72	0-1’ & 1-3’	Characterization	Dioxins/Furans
J9-23-17-IA-82	0-1’	Characterization	Dioxins/Furans
J9-23-17-IA-82	1-3’	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
J9-23-17-IA-94	0-1’	Delineation	Lead
J9-23-17-IA-97	3-6’ & 6-15’	Characterization	Dioxins/Furans
J9-23-17-IA-97	0-1’, 3-6’ & 6-15’	Delineation	Lead
J9-23-17-IA-98	3-6’ & 6-15’	Detection Limits	Select VOCs, SVOCs
J9-23-17-IA-101	3-6’ & 6-15’	Characterization	Dioxins/Furans
J9-23-17-IA-101	3-6’ & 6-15’	Delineation	Lead
J9-23-17-IA-102	1-3’	Characterization	VOCs, Dioxins/Furans
J9-23-17-IA-110	0-1’, 1-3’, 3-6’, 6-15’	Characterization	Dioxins/Furans
J9-23-17-IA-110	3-6’ & 6-15’	Delineation	Lead

* GE will extend the soil boring at this location beyond the specified intervals to enable EPA to collect samples from the 10- to 15-foot depth increment.

PARCEL J9-23-18

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: Modifications to the quantity or locations of the Appendix IX+3 samples included in the Supplemental Proposal are not required. Therefore, consistent with that document, GE proposes to collect the following samples for analysis of Appendix IX+3 constituents, as presented on Figures 3 through 5:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-18-H11	1-3' & 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
J9-23-18-RV-1	1-3' & 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
J9-23-18-RV-2	3-6' & 6-15'	Delineation	Lead
J9-23-18-RV-9	10-12'	Detection Limits	Select VOCs, SVOCs

PARCEL J9-23-19

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property. However, as indicated in the Supplemental Proposal, EPA has requested that GE determine what utilities (if any) are present on the property and perform the corresponding utility evaluation, if appropriate. GE will perform a field investigation to determine the presence of utilities at this property during performance of the supplemental sampling activities for Appendix IX+3 constituents, described below. Upon determining the presence of such utilities, GE will perform any required utility corridor evaluations and incorporate the results of such evaluations in the forthcoming Addendum to the Conceptual RD/RA Work Plan.

Supplemental Appendix IX+3 Soil Sampling: In accordance with Comment 1 of EPA's August 5, 2002 letter, GE has made the following changes regarding the proposed Appendix IX+3 samples at this property, as indicated on Figures 2 and 3:

- The proposed sample for the 0- to 1-foot depth increment at location SZ-36 will be moved to a location between the storage trailer and the building along the "I" grid line;
- A new sample will be collected at location SZ-32 from the 0- to 1-foot depth increment for analysis of SVOCs;
- The proposed sample for the 1- to 3-foot depth increment at location SZ-31 will be moved to a location along the property line between Parcels J9-23-18 and J9-23-19 and along the "G" grid line; and
- A new sample will be collected at location I13 from the 1- to 3-foot depth increment for analysis of SVOCs.

Including the changes described above, the Appendix IX+3 sample locations for Parcel J9-23-17 are presented on Figures 2 and 3 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-19-F12	1-3'	Detection Limits	Select VOCs, SVOCs
J9-23-19-H12	1-3'	Detection Limits	Select VOCs, SVOCs
J9-23-19-H13	0-1'	Detection Limits	Select VOCs, SVOCs
J9-23-19-I13	1-3'	Delineation	SVOCs
J9-23-19-SZ-31	1-3'	Delineation	SVOCs, Lead
J9-23-19-SZ-32	0-1'	Delineation	SVOCs

Depth

Sample ID	Increment	Purpose	Analyses
J9-23-19-SZ-32	1-3'	Delineation	SVOCs, Lead
J9-23-19-SZ-33	1-3'	Delineation	SVOCs, Lead
J9-23-19-SZ-34	0-1'	Delineation	SVOCs
J9-23-19-SZ-34	1-3'	Delineation	SVOCs, Lead
J9-23-19-SZ-35	0-1'	Delineation	SVOCs
J9-23-19-SZ-36	0-1'	Delineation	SVOCs
J9-23-19-SZ-37	0-1'	Delineation	SVOCs

PARCEL J9-23-20

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: Modifications to the quantity or locations of the Appendix IX+3 samples included in the Supplemental Proposal are not required. However, consistent with Comment 5 of EPA's August 5, 2002 letter, GE will advance a soil boring at location F14 to enable EPA to collect a sample from the 1- to 3-foot depth increment. Thus, GE proposes to collect the following sample for analysis of Appendix IX+3 constituents, as presented on Figure 2:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-20-F14	0-1'*	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics

* GE will extend the soil boring at this location beyond the specified intervals to enable EPA to collect samples from the 1- to 3-foot depth increment.

PARCEL J9-23-21

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: In accordance with Comment 3 of EPA's August 5, 2002 letter, GE will collect an additional sample at location D15 from the 6- to 15-foot depth increment for analysis of VOCs, SVOCs, and inorganics. Including this sample, the Appendix IX+3 sample locations for Parcel J9-23-17 are presented on Figures 2 through 5 and consist of the following:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-21-D15	0-1', 1-3' & 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
J9-23-21-D15	6-15'	Characterization	VOCs, SVOCs, Inorganics
J9-23-21-I15	1-3' & 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
J9-23-21-SZ-19	1-3' & 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics

PARCEL J9-23-22

Supplemental PCB Soil Sampling: Modifications to the quantity or locations of the PCB samples included in the Supplemental Proposal are not required. Therefore, consistent with that document, GE proposes to collect the following samples for analysis of PCBs, as presented on Figure 1:

Sample ID	Depth Increment
J9-23-22-K18	1 -3' & 3-6'

Supplemental Appendix IX+3 Soil Sampling: Modifications to the quantity or locations of the Appendix IX+3 samples included in the Supplemental Proposal are not required. However, consistent with Comment 5 of EPA's August 5, 2002 letter, GE will advance a soil boring at location C16 to enable EPA to collect a sample from the 3- to 6-foot depth increment. In summary, GE proposes to collect the following samples for analysis of Appendix IX+3 constituents, as presented on Figure 2:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-22-C16	1-3'*	Characterization	VOCs, SVOCs, Dioxins/Furans
J9-23-22-C16	6-15'	Characterization	VOCs**, SVOCs, Dioxins/Furans, Inorganics
J9-23-22-F16	1-3', 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
J9-23-22-H16	6-15'	Characterization	VOCs**, SVOCs, Dioxins/Furans, Inorganics
J9-23-22-J18	1-3'	Detection Limits	Select SVOCs

* GE will extend the soil boring at this location beyond the specified intervals to enable EPA to collect samples from the 3- to 6-foot depth increment.
** The 2-foot sample increment with the highest PID reading will be submitted for VOC analysis.

PARCEL J9-23-23

Supplemental PCB Soil Sampling: Modifications to the quantity or locations of the PCB samples included in the Supplemental Proposal are not required. However, consistent with Comment 4 of EPA's August 5, 2002 letter, should access restrictions prevent the performance of the proposed soil boring at location F18B, GE will advance the boring outside the western wall of the building along grid line "F". Similarly, if the soil boring proposed for location H18B cannot be performed, GE will advance an alternate soil boring outside the east wall of the building, along grid line "H". In summary, GE proposes to collect the following samples for analysis of PCBs, as presented on Figure 1:

Sample ID	Depth Increment
J9-23-23-F18B (or alternate)	0 -1', 1-3', 3-6', 6-10' & 10-15'
J9-23-23-G18B	0-1'
J9-23-23-H18B (or alternate)	0-1', 1-3', 3-6', 6-10' & 10-15'
J9-23-23-I19	0-1'

Supplemental Appendix IX+3 Soil Sampling: Modifications to the quantity or locations of the Appendix IX+3 samples included in the Supplemental Proposal are not required. Therefore, consistent with that document, GE proposes to collect the following samples for analysis of Appendix IX+3 constituents, as presented on Figures 2, 3 and 5:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-23-D18	6-15'	Characterization	VOCs*, SVOCs, Dioxins/Furans, Inorganics
J9-23-23-F18B	1-3'	Characterization	VOCs, SVOCs, Dioxins/Furans
J9-23-23-H19	0-1'	Detection Limits	Select VOCs, SVOCs
J9-23-23-I19	0-1'	Characterization	VOCs, SVOCs, Dioxins/Furans

* The 2-foot sample increment with the highest PID reading will be submitted for VOC analysis.

It should be noted, that if it is not feasible to install a soil boring at location J9-23-23-F18B (which is inside the building), then the 1- to 3-foot sample proposed for that location will be collected from the same replacement soil boring outside the building at which the required PCB samples will be collected.

PARCEL J9-23-24

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: Modifications to the quantity or locations of the Appendix IX+3 samples included in the Supplemental Proposal are not required. Therefore, consistent with that document, GE proposes to collect the following samples for analysis of Appendix IX+3 constituents, as presented on Figures 3 through 5:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-24-G20	1-3' & 3-6'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics
J9-23-24-H20	6-8'	Detection Limits	Select VOCs, SVOCs

PARCEL J9-23-25

Supplemental PCB Soil Sampling: No additional sampling for PCBs is proposed at this property.

Supplemental Appendix IX+3 Soil Sampling: Modifications to the quantity or locations of the Appendix IX+3 samples included in the Supplemental Proposal are not required. Therefore, consistent with that document, GE proposes to collect the following samples for analysis of Appendix IX+3 constituents, as presented on Figure 5:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-25-D20	6-15'	Characterization	VOCs*, SVOCs, Dioxins/Furans, Inorganics
J9-23-25-F22	6-15'	Characterization	VOCs*, SVOCs, Dioxins/Furans, Inorganics

* The 2-foot sample increment with the highest PID reading will be submitted for VOC analysis.

PARCEL J9-23-26

Supplemental PCB Soil Sampling: Modifications to the quantity or locations of the PCB samples included in the Supplemental Proposal are not required. Therefore, GE proposes to collect the following samples for analysis of PCBs, as presented on Figure 1:

Sample ID	Depth Increment
J9-23-26-SLO445	3 -6', 6-10' & 10-15'

Supplemental Appendix IX+3 Soil Sampling: Modifications to the quantity or locations of the Appendix IX+3 samples included in the Supplemental Proposal are not required. Therefore, consistent with that document, GE proposes to collect the following sample for analysis of Appendix IX+3 constituents, as presented on Figure 3:

Sample ID	Depth Increment	Purpose	Analyses
J9-23-26-E22	1-3'	Characterization	VOCs, SVOCs, Dioxins/Furans, Inorganics

SCHEDULE

In accordance with Comment 6 of EPA's August 5, 2002 letter, GE will submit an Addendum to the Conceptual RD/RA Work Plan, which will include the results of this supplemental sampling proposal, as well as revised Removal Design/Removal Action evaluations, within 4 months of GE's receipt of EPA's approval of this Revised Supplemental Proposal.

Please contact me with any questions or comments you have regarding this Revised Supplemental Proposal.

Sincerely,

Richard Gates /CRA

Richard Gates
Remediation Project Manager

Attachments
V:GE_CD_NSAI_Agreements\4142199.doc

cc: Tim Conway, EPA
Holly Inglis, EPA
Michael Nalipinski, EPA
Rose Howell, EPA
K.C. Mitkevicius, USACE
Dawn Jamros, Weston
Alan Weinberg, MDEP (cover letter only)
Robert Bell, MDEP (cover letter only)
Thomas Angus, MDEP (cover letter only)
Susan Streenstrup (2 copies)
Susan Keydel, MDEP
Nancy E. Harper, MA AG (cover letter only)
Charles Fredette, CDEP (cover letter only)
Dale Young, MA EOEA
Mayor S. Hathaway, City of Pittsfield
Thomas Hickey, Director, PEDA
Pittsfield Department of Health
Teresa Bowers, Gradient
Michael Carroll, GE (cover letter only)
Andrew Silfer, GE
Rod McLaren, GE
James Bieke, Shea & Gardner
James Nuss, BBL
Jeffrey Bernstein, Bernstein, Cushner & Kimmel
Property Owner - 187 Newell Street
Property Owner - 203 Newell Street
Property Owner - 217 Newell Street
Property Owner - 221, 229, 230 Newell Street
Property Owner - 247/249 Newell Street
Property Owner - 269 Newell Street
Property Owner - 273 Newell Street
Cristóbal Bonifaz, Esq.
Public Information Repositories
GE Internal Repository

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	J9-23-12									
Proposed Sample Location:	C-12	C-12	SLO083	SLO083	SLO093	SLO102	SLO466	SLO466	SLO466	SLO466
Proposed Sample Increment:	0-1'	1-3'[(1)]	1-3'	10-15'	0-1'	0-1'	1-3'[(1)]	3-6'	6-10'	10-15'
PCBs				X				X	X	X
VOCs			X				X			
SVOCs		X	X				X			
Dioxins/Furans		X	X				X			
Inorganics		X	X				X			
Select VOCs										
1,1,2-Trichloroethane										
1,1-Dichloroethene										
1,2,3-Trichloropropane	X				X					
1,2-Dibromoethane										
1,2-Dichloroethane										
1,2-Dichloropropane										
1,4-Dioxane										
Acrolein										
Acrylonitrile										
Benzene										
Bromodichloromethane										
Carbon Tetrachloride										
Chloroform										
Chloromethane										
cis-1,2-Dichloropropene										
trans-1,3-Dichloropropene										
Vinyl Chloride										
Select SVOCs										
1,2-Diphenylhydrazine	X				X					
1,4-Dichlorobenzene										
2-Nitroaniline										
3,3'-Dichlorobenzidine										
3,3'-Dimethylbenzidine	X				X					
3-Nitroaniline										
4-Chlorobenzilate										
4-Nitroaniline										
7,12-Dimethylbenz(a)anthracene	X				X					
Acetophenone	X				X					
Aramite										
Benzidine	X				X					
bis(2-Chloroethyl)ether	X				X					
bis(2-Chloroisopropyl)ether										
Diallate										
Dibenzo(a,h)anthracene	X				X					
Hexachlorobenzene	X				X					
Hexachlorobutadiene										
Indeno(1,2,3-cd)pyrene	X				X					
Methapyrilene										
N-Nitrosodiethylamine	X				X					
N-Nitrosodimethylamine	X				X					
N-Nitroso-di-n-butylamine	X				X					
N-Nitroso-di-n-propylamine	X				X					
N-Nitrosomethylethylamine	X				X					
N-Nitrosopyrrolidine	X				X					
o-Toluidine										
Pentachloronitrobenzene										
Pentachlorophenol	X				X					
Select Inorganics										
Lead						X				

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	J9-23-13									J9-23-16
Proposed Sample Location:	D-4	D-5	MM-6BBL	MM-13	MM-14	MM-14	MM-15	MM-15	MM-16	D-6
Proposed Sample Increment:	3-6'	1-3'	0-1'	1-3'	0-1'	1-3'	0-1'	1-3'	1-3'	3-6'
PCBs										
VOCs										
SVOCs										
Dioxins/Furans										
Inorganics										
Select VOCs										
1,1,2-Trichloroethane										
1,1-Dichloroethene										
1,2,3-Trichloropropane										
1,2-Dibromoethane										
1,2-Dichloroethane										
1,2-Dichloropropane										
1,4-Dioxane										
Acrolein										
Acrylonitrile										
Benzene										
Bromodichloromethane										
Carbon Tetrachloride										
Chloroform										
Chloromethane										
cis-1,2-Dichloropropene										
trans-1,3-Dichloropropene										
Vinyl Chloride										
Select SVOCs										
1,2-Diphenylhydrazine										
1,4-Dichlorobenzene										
2-Nitroaniline										
3,3'-Dichlorobenzidine										
3,3'-Dimethylbenzidine										
3-Nitroaniline										
4-Chlorobenzilate										
4-Nitroaniline										
7,12-Dimethylbenz(a)anthracene										
Acetophenone										
Aramite										
Benzidine										
bis(2-Chloroethyl)ether										
bis(2-Chloroisopropyl)ether										
Diallate										
Dibenzo(a,h)anthracene										
Hexachlorobenzene										
Hexachlorobutadiene										
Indeno(1,2,3-cd)pyrene										
Methapyrilene										
N-Nitrosodiethylamine										
N-Nitrosodimethylamine										
N-Nitroso-di-n-butylamine										
N-Nitroso-di-n-propylamine										
N-Nitrosomethylethylamine										
N-Nitrosopyrrolidine										
o-Toluidine										
Pentachloronitrobenzene										
Pentachlorophenol										
Select Inorganics										
Lead	X	X	X	X	X	X	X	X	X	X

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	J9-23-16									
Proposed Sample Location:	H-6[2]	H-6[2]	H-6[2]	H-6[2]	H-6[2]	I-6	QP-14	QP-19	QP-26	QP-27
Proposed Sample Increment:	0-1'	1-3'	3-6'	6-10'	10-15'	0-1'	0-1'	1-3'	1-3'	4-6'
PCBs	X	X	X	X	X	X				
VOCs				X[3]	X[3]					
SVOCs				X	X					
Dioxins/Furans				X	X					
Inorganics				X	X					
Select VOCs										
1,1,2-Trichloroethane										
1,1-Dichloroethene										
1,2,3-Trichloropropane										
1,2-Dibromoethane										
1,2-Dichloroethane										
1,2-Dichloropropane										
1,4-Dioxane										
Acrolein										
Acrylonitrile										
Benzene										
Bromodichloromethane										
Carbon Tetrachloride										
Chloroform										
Chloromethane										
cis-1,2-Dichloropropene										
trans-1,3-Dichloropropene										
Vinyl Chloride										
Select SVOCs										
1,2-Diphenylhydrazine										
1,4-Dichlorobenzene										
2-Nitroaniline										
3,3'-Dichlorobenzidine										
3,3'-Dimethylbenzidine										X
3-Nitroaniline										
4-Chlorobenzilate										
4-Nitroaniline										
7,12-Dimethylbenz(a)anthracene										X
Acetophenone										
Aramite										
Benzidine										X
bis(2-Chloroethyl)ether										
bis(2-Chloroisopropyl)ether										
Diallate										
Dibenzo(a,h)anthracene										
Hexachlorobenzene										
Hexachlorobutadiene										
Indeno(1,2,3-cd)pyrene										
Methapyrilene										
N-Nitrosodiethylamine										X
N-Nitrosodimethylamine										X
N-Nitroso-di-n-butylamine										X
N-Nitroso-di-n-propylamine										
N-Nitrosomethylethylamine										X
N-Nitrosopyrrolidine										
o-Toluidine										
Pentachloronitrobenzene										
Pentachlorophenol										
Select Inorganics										
Lead							X	X	X	

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	**J9-23-16**									
Proposed Sample Location:	**QP-31**	**QP-33**	**QP-33**	**QP-33**	**QP-34**	**QP-34**	**QP-34**	**QP-35**	**QP-35**	**QP-35**
Proposed Sample Increment:	**1-3'**	**1-3'**	**3-6'**	**6-10',(4)**	**1-3'**	**3-6'**	**6-10',(4)**	**0-1'**	**1-3'**	**3-6'**
PCBs										
VOCs										
SVOCs										
Dioxins/Furans										
Inorganics										
Select VOCs										
1,1,2-Trichloroethane										
1,1-Dichloroethene										
1,2,3-Trichloropropane										
1,2-Dibromoethane										
1,2-Dichloroethane										
1,2-Dichloropropane										
1,4-Dioxane										
Acrolein										
Acrylonitrile										
Benzene										
Bromodichloromethane										
Carbon Tetrachloride										
Chloroform										
Chloromethane										
cis-1,2-Dichloropropene										
trans-1,3-Dichloropropene										
Vinyl Chloride										
Select SVOCs										
1,2-Diphenylhydrazine										
1,4-Dichlorobenzene										
2-Nitroaniline										
3,3'-Dichlorobenzidine										
3,3'-Dimethylbenzidine										
3-Nitroaniline										
4-Chlorobenzilate										
4-Nitroaniline										
7,12-Dimethylbenz(a)anthracene										
Acetophenone										
Aramite										
Benzidine										
bis(2-Chloroethyl)ether										
bis(2-Chloroisopropyl)ether										
Diallate										
Dibenzo(a,h)anthracene										
Hexachlorobenzene										
Hexachlorobutadiene										
Indeno(1,2,3-cd)pyrene										
Methapyrilene										
N-Nitrosodiethylamine										
N-Nitrosodimethylamine										
N-Nitroso-di-n-butylamine										
N-Nitroso-di-n-propylamine										
N-Nitrosomethylethylamine										
N-Nitrosopyrrolidine										
o-Toluidine										
Pentachloronitrobenzene										
Pentachlorophenol										
Select Inorganics										
Lead	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**	**X**

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	J9-23-16	J9-23-17								
Proposed Sample Location:	QP-35	IA-40	IA-40	IA-40	IA-63	IA-72	IA-72	IA-82	IA-82	IA-94
Proposed Sample Increment:	6-10'(4)	1-3'	3-6'	6-10'(4)	0-1'	0-1'	1-3'	0-1'	1-3'	0-1'
PCBs										
VOCs									X	
SVOCs									X	
Dioxins/Furans					X	X	X	X	X	
Inorganics									X	
Select VOCs										
1,1,2-Trichloroethane										
1,1-Dichloroethene										
1,2,3-Trichloropropane										
1,2-Dibromoethane										
1,2-Dichloroethane										
1,2-Dichloropropane										
1,4-Dioxane										
Acrolein										
Acrylonitrile										
Benzene										
Bromodichloromethane										
Carbon Tetrachloride										
Chloroform										
Chloromethane										
cis-1,2-Dichloropropene										
trans-1,3-Dichloropropene										
Vinyl Chloride										
Select SVOCs										
1,2-Diphenylhydrazine										
1,4-Dichlorobenzene										
2-Nitroaniline										
3,3'-Dichlorobenzidine										
3,3'-Dimethylbenzidine										
3-Nitroaniline										
4-Chlorobenzilate										
4-Nitroaniline										
7,12-Dimethylbenz(a)anthracene										
Acetophenone										
Aramite										
Benzidine										
bis(2-Chloroethyl)ether										
bis(2-Chloroisopropyl)ether										
Diallate										
Dibenzo(a,h)anthracene										
Hexachlorobenzene										
Hexachlorobutadiene										
Indeno(1,2,3-cd)pyrene										
Methapyrilene										
N-Nitrosodiethylamine										
N-Nitrosodimethylamine										
N-Nitroso-di-n-butylamine										
N-Nitroso-di-n-propylamine										
N-Nitrosomethylethylamine										
N-Nitrosopyrrolidine										
o-Toluidine										
Pentachloronitrobenzene										
Pentachlorophenol										
Select Inorganics										
Lead	X	X	X	X						X

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	J9-23-17									
Proposed Sample Location:	IA-97	IA-97	IA-97	IA-98	IA-98	IA-101	IA-101	IA-102	IA-110	IA-110
Proposed Sample Increment:	0-1'	3-6'	6-15'	3-6'	6-15'	3-6'	6-15'	1-3'	0-1'	1-3'
PCBs										
VOCs								X		
SVOCs										
Dioxins/Furans		X	X			X	X	X	X	X
Inorganics										
Select VOCs										
1,1,2-Trichloroethane										
1,1-Dichloroethene										
1,2,3-Trichloropropane				X	X					
1,2-Dibromoethane										
1,2-Dichloroethane										
1,2-Dichloropropane										
1,4-Dioxane										
Acrolein										
Acrylonitrile										
Benzene										
Bromodichloromethane										
Carbon Tetrachloride										
Chloroform										
Chloromethane										
cis-1,2-Dichloropropene										
trans-1,3-Dichloropropene										
Vinyl Chloride										
Select SVOCs										
1,2-Diphenylhydrazine										
1,4-Dichlorobenzene										
2-Nitroaniline										
3,3'-Dichlorobenzidine										
3,3'-Dimethylbenzidine				X	X					
3-Nitroaniline										
4-Chlorobenzilate										
4-Nitroaniline										
7,12-Dimethylbenz(a)anthracene				X	X					
Acetophenone										
Aramite										
Benzidine				X	X					
bis(2-Chloroethyl)ether										
bis(2-Chloroisopropyl)ether										
Diallate										
Dibenzo(a,h)anthracene				X	X					
Hexachlorobenzene										
Hexachlorobutadiene										
Indeno(1,2,3-cd)pyrene										
Methapyrilene										
N-Nitrosodiethylamine				X	X					
N-Nitrosodimethylamine				X	X					
N-Nitroso-di-n-butylamine				X	X					
N-Nitroso-di-n-propylamine				X	X					
N-Nitrosomethylethylamine				X	X					
N-Nitrosopyrrolidine										
o-Toluidine										
Pentachloronitrobenzene										
Pentachlorophenol										
Select Inorganics										
Lead	X	X	X			X	X			

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	J9-23-17		J9-23-18							J9-23-19
Proposed Sample Location:	IA-110	IA-110	H-11	H-11	RV-1	RV-1	RV-2	RV-2	RV-9	F-12
Proposed Sample Increment:	3-6'	6-15'	1-3'	3-6'	1-3'	3-6'	3-6'	6-15'	10-12'	1-3'
PCBs										
VOCs			X	X	X	X				
SVOCs			X	X	X	X				
Dioxins/Furans	X	X	X	X	X	X				
Inorganics			X	X	X	X				
Select VOCs										
1,1,2-Trichloroethane									X	
1,1-Dichloroethene									X	
1,2,3-Trichloropropane									X	X
1,2-Dibromoethane										
1,2-Dichloroethane									X	
1,2-Dichloropropane									X	
1,4-Dioxane									X	
Acrolein										
Acrylonitrile										
Benzene									X	
Bromodichloromethane									X	
Carbon Tetrachloride									X	
Chloroform									X	
Chloromethane									X	
cis-1,2-Dichloropropene									X	
trans-1,3-Dichloropropene									X	
Vinyl Chloride									X	
Select SVOCs										
1,2-Diphenylhydrazine										X
1,4-Dichlorobenzene										X
2-Nitroaniline										X
3,3'-Dichlorobenzidine										X
3,3'-Dimethylbenzidine									X	X
3-Nitroaniline										X
4-Chlorobenzilate										X
4-Nitroaniline										X
7,12-Dimethylbenz(a)anthracene									X	X
Acetophenone										X
Aramite										X
Benzidine									X	X
bis(2-Chloroethyl)ether									X	X
bis(2-Chloroisopropyl)ether										X
Diallate										X
Dibenzo(a,h)anthracene										
Hexachlorobenzene										X
Hexachlorobutadiene										X
Indeno(1,2,3-cd)pyrene										
Methapyrilene										X
N-Nitrosodiethylamine									X	X
N-Nitrosodimethylamine									X	X
N-Nitroso-di-n-butylamine									X	X
N-Nitroso-di-n-propylamine									X	X
N-Nitrosomethylethylamine									X	X
N-Nitrosopyrrolidine										X
o-Toluidine										X
Pentachloronitrobenzene										X
Pentachlorophenol										X
Select Inorganics										
Lead	X	X					X	X		

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	J9-23-19									
Proposed Sample Location:	H-12	H-13	I-13	SZ-31	SZ-32	SZ-32	SZ-33	SZ-34	SZ-34	SZ-35
Proposed Sample Increment:	1-3'	0-1'	1-3'	1-3'	0-1'	1-3'	1-3'	0-1'	1-3'	0-1'
PCBs										
VOCs										
SVOCs			X	X	X	X	X	X	X	X
Dioxins/Furans										
Inorganics										
Select VOCs										
1,1,2-Trichloroethane										
1,1-Dichloroethene										
1,2,3-Trichloropropane	X	X								
1,2-Dibromoethane										
1,2-Dichloroethane										
1,2-Dichloropropane										
1,4-Dioxane										
Acrolein										
Acrylonitrile										
Benzene										
Bromodichloromethane										
Carbon Tetrachloride										
Chloroform										
Chloromethane										
cis-1,2-Dichloropropene										
trans-1,3-Dichloropropene										
Vinyl Chloride										
Select SVOCs										
1,2-Diphenylhydrazine	X	X								
1,4-Dichlorobenzene	X	X								
2-Nitroaniline	X	X								
3,3'-Dichlorobenzidine	X	X								
3,3'-Dimethylbenzidine	X	X								
3-Nitroaniline	X	X								
4-Chlorobenzilate	X	X								
4-Nitroaniline	X	X								
7,12-Dimethylbenz(a)anthracene	X	X								
Acetophenone	X	X								
Aramite	X	X								
Benzidine	X	X								
bis(2-Chloroethyl)ether	X	X								
bis(2-Chloroisopropyl)ether	X	X								
Diallate	X	X								
Dibenzo(a,h)anthracene										
Hexachlorobenzene	X	X								
Hexachlorobutadiene	X	X								
Indeno(1,2,3-cd)pyrene										
Methapyrilene	X	X								
N-Nitrosodiethylamine	X	X								
N-Nitrosodimethylamine	X	X								
N-Nitroso-di-n-butylamine	X	X								
N-Nitroso-di-n-propylamine	X	X								
N-Nitrosomethylethylamine	X	X								
N-Nitrosopyrrolidine	X	X								
o-Toluidine	X	X								
Pentachloronitrobenzene	X	X								
Pentachlorophenol	X	X								
Select Inorganics										
Lead				X		X	X		X	

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	J9-23-19		J9-23-20	J9-23-21						
Proposed Sample Location:	SZ-36	SZ-37	F-14	D-15	D-15	D-15	D-15	I-15	I-15	SZ-19
Proposed Sample Increment:	0-1'	0-1'	0-1'[5]	0-1'	1-3'	3-6'	6-15'	1-3'	3-6'	1-3'
PCBs										
VOCs			X	X	X	X	X	X	X	X
SVOCs	X	X	X	X	X	X	X	X	X	X
Dioxins/Furans			X	X	X	X		X	X	X
Inorganics			X	X	X	X	X	X	X	X
Select VOCs										
1,1,2-Trichloroethane										
1,1-Dichloroethene										
1,2,3-Trichloropropane										
1,2-Dibromoethane										
1,2-Dichloroethane										
1,2-Dichloropropane										
1,4-Dioxane										
Acrolein										
Acrylonitrile										
Benzene										
Bromodichloromethane										
Carbon Tetrachloride										
Chloroform										
Chloromethane										
cis-1,2-Dichloropropene										
trans-1,3-Dichloropropene										
Vinyl Chloride										
Select SVOCs										
1,2-Diphenylhydrazine										
1,4-Dichlorobenzene										
2-Nitroaniline										
3,3'-Dichlorobenzidine										
3,3'-Dimethylbenzidine										
3-Nitroaniline										
4-Chlorobenzilate										
4-Nitroaniline										
7,12-Dimethylbenz(a)anthracene										
Acetophenone										
Aramite										
Benzidine										
bis(2-Chloroethyl)ether										
bis(2-Chloroisopropyl)ether										
Diallate										
Dibenzo(a,h)anthracene										
Hexachlorobenzene										
Hexachlorobutadiene										
Indeno(1,2,3-cd)pyrene										
Methapyrilene										
N-Nitrosodiethylamine										
N-Nitrosodimethylamine										
N-Nitroso-di-n-butylamine										
N-Nitroso-di-n-propylamine										
N-Nitrosomethylethylamine										
N-Nitrosopyrrolidine										
o-Toluidine										
Pentachloronitrobenzene										
Pentachlorophenol										
Select Inorganics										
Lead										

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	J9-23-21	J9-23-22								J9-23-23
Proposed Sample Location:	SZ-19	K-18	K-18	C-16	C-16	F-16	F-16	H-16	J-18	D-18
Proposed Sample Increment:	3-6'	1-3'	3-6'	1-3'[6]	6-15'	1-3'	3-6'	6-15'	1-3'	6-15'
PCBs		X	X							
VOCs	X			X	X[3]	X	X	X[3]		X[3]
SVOCs	X			X	X	X	X	X		X
Dioxins/Furans	X			X	X	X	X	X		X
Inorganics	X				X	X	X	X		X
Select VOCs										
1,1,2-Trichloroethane										
1,1-Dichloroethene										
1,2,3-Trichloropropane										
1,2-Dibromoethane										
1,2-Dichloroethane										
1,2-Dichloropropane										
1,4-Dioxane										
Acrolein										
Acrylonitrile										
Benzene										
Bromodichloromethane										
Carbon Tetrachloride										
Chloroform										
Chloromethane										
cis-1,2-Dichloropropene										
trans-1,3-Dichloropropene										
Vinyl Chloride										
Select SVOCs										
1,2-Diphenylhydrazine										
1,4-Dichlorobenzene										
2-Nitroaniline										
3,3'-Dichlorobenzidine										
3,3'-Dimethylbenzidine									X	
3-Nitroaniline										
4-Chlorobenzilate										
4-Nitroaniline										
7,12-Dimethylbenz(a)anthracene										
Acetophenone										
Aramite										
Benzidine									X	
bis(2-Chloroethyl)ether										
bis(2-Chloroisopropyl)ether										
Diallate										
Dibenzo(a,h)anthracene										
Hexachlorobenzene										
Hexachlorobutadiene										
Indeno(1,2,3-cd)pyrene										
Methapyrilene										
N-Nitrosodiethylamine									X	
N-Nitrosodimethylamine									X	
N-Nitroso-di-n-butylamine									X	
N-Nitroso-di-n-propylamine										
N-Nitrosomethylethylamine									X	
N-Nitrosopyrrolidine										
o-Toluidine										
Pentachloronitrobenzene										
Pentachlorophenol										
Select Inorganics										
Lead										

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	**J9-23-23**									
Proposed Sample Location:	**F-18B[7]**	**F-18B[7]**	**F-18B[7]**	**F-18B[7]**	**F-18B[7]**	**G-18B**	**H-18B[8]**	**H-18B[8]**	**H-18B[8]**	**H-18B[8]**
Proposed Sample Increment:	**0-1'**	**1-3'**	**3-6'**	**6-10'**	**10-15'**	**0-1'**	**0-1'**	**1-3'**	**3-6'**	**6-10'**
PCBs	X	X	X	X	X	X	X	X	X	X
VOCs		X								
SVOCs		X								
Dioxins/Furans		X								
Inorganics										
Select VOCs										
1,1,2-Trichloroethane										
1,1-Dichloroethene										
1,2,3-Trichloropropane										
1,2-Dibromoethane										
1,2-Dichloroethane										
1,2-Dichloropropane										
1,4-Dioxane										
Acrolein										
Acrylonitrile										
Benzene										
Bromodichloromethane										
Carbon Tetrachloride										
Chloroform										
Chloromethane										
cis-1,2-Dichloropropene										
trans-1,3-Dichloropropene										
Vinyl Chloride										
Select SVOCs										
1,2-Diphenylhydrazine										
1,4-Dichlorobenzene										
2-Nitroaniline										
3,3'-Dichlorobenzidine										
3,3'-Dimethylbenzidine										
3-Nitroaniline										
4-Chlorobenzilate										
4-Nitroaniline										
7,12-Dimethylbenz(a)anthracene										
Acetophenone										
Aramite										
Benzidine										
bis(2-Chloroethyl)ether										
bis(2-Chloroisopropyl)ether										
Diallate										
Dibenzo(a,h)anthracene										
Hexachlorobenzene										
Hexachlorobutadiene										
Indeno(1,2,3-cd)pyrene										
Methapyrilene										
N-Nitrosodiethylamine										
N-Nitrosodimethylamine										
N-Nitroso-di-n-butylamine										
N-Nitroso-di-n-propylamine										
N-Nitrosomethylethylamine										
N-Nitrosopyrrolidine										
o-Toluidine										
Pentachloronitrobenzene										
Pentachlorophenol										
Select Inorganics										
Lead										

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	J9-23-23			J9-23-24			J9-23-25	
Proposed Sample Location:	H-18B[8]	H-19	I-19	G-20	G-20	H-20	D-20	F-22
Proposed Sample Increment:	10-15'	0-1'	0-1'	1-3'	3-6'	6-8'	6-15'	6-15'
PCBs	X		X					
VOCs			X	X	X		X[3]	X[3]
SVOCs			X	X	X		X	X
Dioxins/Furans			X	X	X		X	X
Inorganics				X	X		X	X
Select VOCs								
1,1,2-Trichloroethane								
1,1-Dichloroethene		X				X		
1,2,3-Trichloropropane						X		
1,2-Dibromoethane						X		
1,2-Dichloroethane		X						
1,2-Dichloropropane								
1,4-Dioxane		X						
Acrolein						X		
Acrylonitrile						X		
Benzene								
Bromodichloromethane								
Carbon Tetrachloride								
Chloroform		X						
Chloromethane		X						
cis-1,2-Dichloropropene								
trans-1,3-Dichloropropene								
Vinyl Chloride		X				X		
Select SVOCs								
1,2-Diphenylhydrazine								
1,4-Dichlorobenzene								
2-Nitroaniline								
3,3'-Dichlorobenzidine								
3,3'-Dimethylbenzidine		X				X		
3-Nitroaniline								
4-Chlorobenzilate								
4-Nitroaniline								
7,12-Dimethylbenz(a)anthracene		X				X		
Acetophenone								
Aramite								
Benzidine		X				X		
bis(2-Chloroethyl)ether						X		
bis(2-Chloroisopropyl)ether								
Diallate								
Dibenzo(a,h)anthracene		X						
Hexachlorobenzene								
Hexachlorobutadiene								
Indeno(1,2,3-cd)pyrene								
Methapyrilene								
N-Nitrosodiethylamine		X				X		
N-Nitrosodimethylamine		X				X		
N-Nitroso-di-n-butylamine		X				X		
N-Nitroso-di-n-propylamine						X		
N-Nitrosomethylethylamine		X				X		
N-Nitrosopyrrolidine								
o-Toluidine								
Pentachloronitrobenzene								
Pentachlorophenol								
Select Inorganics								
Lead								

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

Parcel ID:	J9-23-26			
Proposed Sample Location:	SLO445	SLO445	SLO445	E-22
Proposed Sample Increment:	3-6'	6-10'	10-15'	1-3'
PCBs	X	X	X	
VOCs				X
SVOCs				X
Dioxins/Furans				X
Inorganics				X
Select VOCs				
1,1,2-Trichloroethane				
1,1-Dichloroethene				
1,2,3-Trichloropropane				
1,2-Dibromoethane				
1,2-Dichloroethane				
1,2-Dichloropropane				
1,4-Dioxane				
Acrolein				
Acrylonitrile				
Benzene				
Bromodichloromethane				
Carbon Tetrachloride				
Chloroform				
Chloromethane				
cis-1,2-Dichloropropene				
trans-1,3-Dichloropropene				
Vinyl Chloride				
Select SVOCs				
1,2-Diphenylhydrazine				
1,4-Dichlorobenzene				
2-Nitroaniline				
3,3'-Dichlorobenzidine				
3,3'-Dimethylbenzidine				
3-Nitroaniline				
4-Chlorobenzilate				
4-Nitroaniline				
7,12-Dimethylbenz(a)anthracene				
Acetophenone				
Aramite				
Benzidine				
bis(2-Chloroethyl)ether				
bis(2-Chloroisopropyl)ether				
Diallate				
Dibenzo(a,h)anthracene				
Hexachlorobenzene				
Hexachlorobutadiene				
Indeno(1,2,3-cd)pyrene				
Methapyrilene				
N-Nitrosodiethylamine				
N-Nitrosodimethylamine				
N-Nitroso-di-n-butylamine				
N-Nitroso-di-n-propylamine				
N-Nitrosomethylethylamine				
N-Nitrosopyrrolidine				
o-Toluidine				
Pentachloronitrobenzene				
Pentachlorophenol				
Select Inorganics				
Lead				

See Notes on Page 14.

TABLE 1

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I - REVISED SUPPLEMENTAL SAMPLING PROPOSAL

SAMPLE LOCATIONS, DEPTHS, AND ANALYSES

NOTES:

1. GE will advance the soil boring at this location beyond the depth increment proposed to enable EPA to collect samples from the 3- to 6-foot and 6- to 15-foot depth increments.
2. Should GE be unable to advance the soil boring at this location inside the building, the soil boring will be advanced outside the north wall of the building along grid line "6".
3. Only the sample with the highest PID reading will be sampled from the 6- to 15-foot depth increment at this sample location.
4. GE will advance the soil boring at this location beyond the depth increment proposed to enable EPA to collect samples from the 10- to 15-foot depth increment.
5. GE will advance the soil boring at this location beyond the depth increment proposed to enable EPA to collect samples from the 1- to 3-foot depth increment.
6. GE will advance the soil boring at this location beyond the depth increment proposed to enable EPA to collect samples from the 3- to 6-foot depth increment.
7. Should GE be unable to advance the soil boring at this location inside the building, the soil boring will be advanced outside the west wall of the building along grid line "F".
8. Should GE be unable to advance the soil boring at this location inside the building, the soil boring will be advanced outside the east wall of the building along grid line "H".

X = indicates the constituents to be included in analysis of the proposed samples.

LEGEND

- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- EASEMENT
- J9-23-23 PARCEL ID
- TOP OF BANK
- DRAIN LINE
- SANITARY SEWER
- AREA TO BE ADDRESSED AS PART OF 1/2-MILE REACH
- QP-30 OR ◆ME3 GE EXISTING SURFACE SOIL SAMPLE LOCATION
- MM-3 GE EXISTING SOIL BORING LOCATION
- BH000467 EPA SOIL BORING LOCATION
- FW-16 EXISTING MONITORING WELL LOCATION
- OT000014 EPA SOIL PILE SAMPLE
- F-23 EXISTING SOIL SAMPLE LOCATION USED TO SATISFY ADDITIONAL ARSENIC ANALYSIS
- (BH000321) EPA SPLIT SAMPLE IDENTIFICATION
- IA-9 ABANDONED MONITORING WELL LOCATION
- (3-6) SUPPLEMENTAL SOIL SAMPLING LOCATION (DEPTH INCREMENT IN PARENTHESES)
- ALL PCB DATA LOCATED WITHIN THIS 50-FOOT WIDE STRIP WILL BE UTILIZED IN UTILITY CORRIDOR EVALUATIONS.

NOTES:

1. ACCESS/CLEARANCE LIMITATIONS MAY PREVENT THE USE OF A DRILL RIG TO COLLECT THE SUBSURFACE SAMPLES AT LOCATIONS H-6, F-18B AND H-18B. IF DRILL RIG ACCESS IS NOT POSSIBLE, GE WILL EITHER ATTEMPT TO MANUALLY COLLECT THESE SAMPLES OR WILL ATTEMPT TO COLLECT THE REQUIRED SOIL SAMPLES AT A SOIL BORING LOCATION IMMEDIATELY OUTSIDE THE BUILDING IN CLOSE PROXIMITY TO THE PROPOSED BORING LOCATION.
2. BASE MAP MODIFIED FROM SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS, DATED 8/15/01.
3. UTILITIES ARE SHOWN IN AN APPROXIMATED WAY ONLY AND ALL UTILITIES MAY NOT BE SHOWN. PRIOR TO ANY CONSTRUCTION, THE CONTRACTOR SHALL CONTRACT "DIG-SAFE" AND HAVE ALL UNDERGROUND UTILITIES MARKED ON THE GROUND.

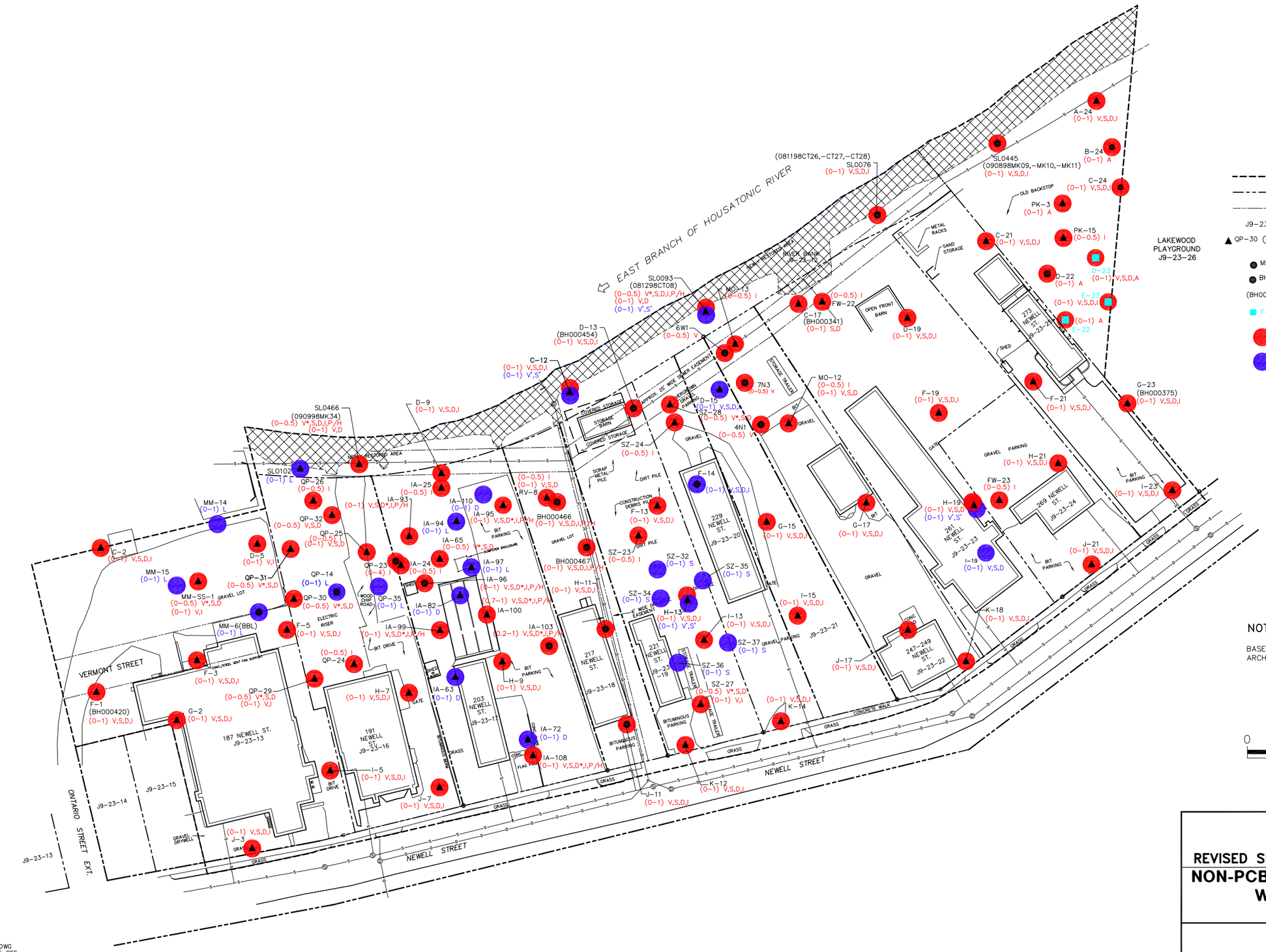
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I
REVISED SUPPLEMENTAL SAMPLING PROPOSAL

REVISED SUPPLEMENTAL PCB SOIL SAMPLE LOCATIONS

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

FIGURE 1

X: 10112X02.DWG
P: PAGESET/PLT-DL
8/19/02 SYR-54-SDL LJP NES
C/10112003/10112P07.DWG



LEGEND:

- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- EASEMENT
- J9-23-23 — PARCEL ID
- ▲ QP-30 OR ● 6E3 — GE EXISTING SURFACE SOIL SAMPLE LOCATION
- ● MM-3 — GE EXISTING SOIL BORING LOCATION
- ● BH000467 — EPA SOIL BORING LOCATION
- (BH000321) — EPA SPLIT SAMPLE IDENTIFICATION
- ■ F-23 — EXISTING SOIL SAMPLE LOCATION USED TO SATISFY ADDITIONAL ARSENIC ANALYSIS
- EXISTING APPENDIX IX+3 SAMPLE LOCATION
- PROPOSED APPENDIX IX+3 SAMPLE LOCATION

A = ARSENIC SAMPLE
D = DIOXIN/FURAN SAMPLE
D* = REJECTED DIOXIN/FURAN SAMPLE
I = INORGANIC COMPOUNDS SAMPLE
L = LEAD SAMPLE
P/H = PESTICIDES/HERBICIDES SAMPLE
S = SEMI-VOLATILE ORGANIC COMPOUNDS SAMPLE
S' = SELECT SEMI-VOLATILE ORGANIC COMPOUNDS SAMPLE. (SEE TABLE 2 FOR LIST OF CONSTITUENTS PROPOSED FOR ANALYSIS)
V = VOLATILE ORGANIC COMPOUNDS SAMPLE
V' = SELECT VOLATILE ORGANIC COMPOUNDS SAMPLE (SEE TABLE 2 FOR LIST OF CONSTITUENTS PROPOSED FOR ANALYSIS)
V* = 1,2-DCB, 1,3-DCB, 1,4-DCB SAMPLES

NOTES:

BASE MAP MODIFIED FROM SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS, DATED 8/15/01.

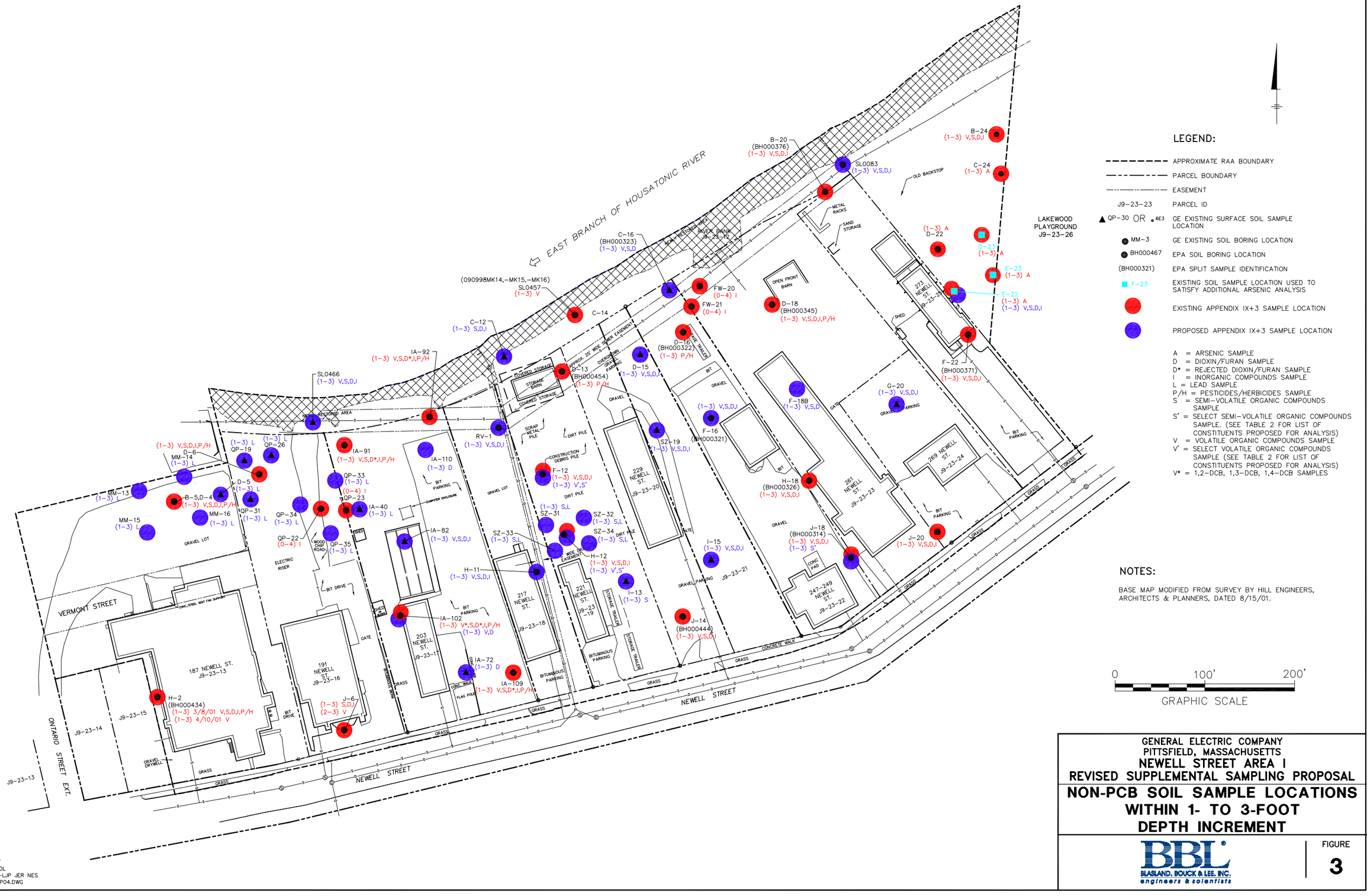
X: 10112X02.DWG
L: ON=*, OFF=REF
P: PAGESET/PLT-DL
8/20/02 SYR-54-LJP LJP NES
C/10112003/10112P03.DWG

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I
REVISED SUPPLEMENTAL SAMPLING PROPOSAL

NON-PCB SOIL SAMPLE LOCATIONS WITHIN 0- TO 1-FOOT DEPTH INCREMENT

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

FIGURE 2



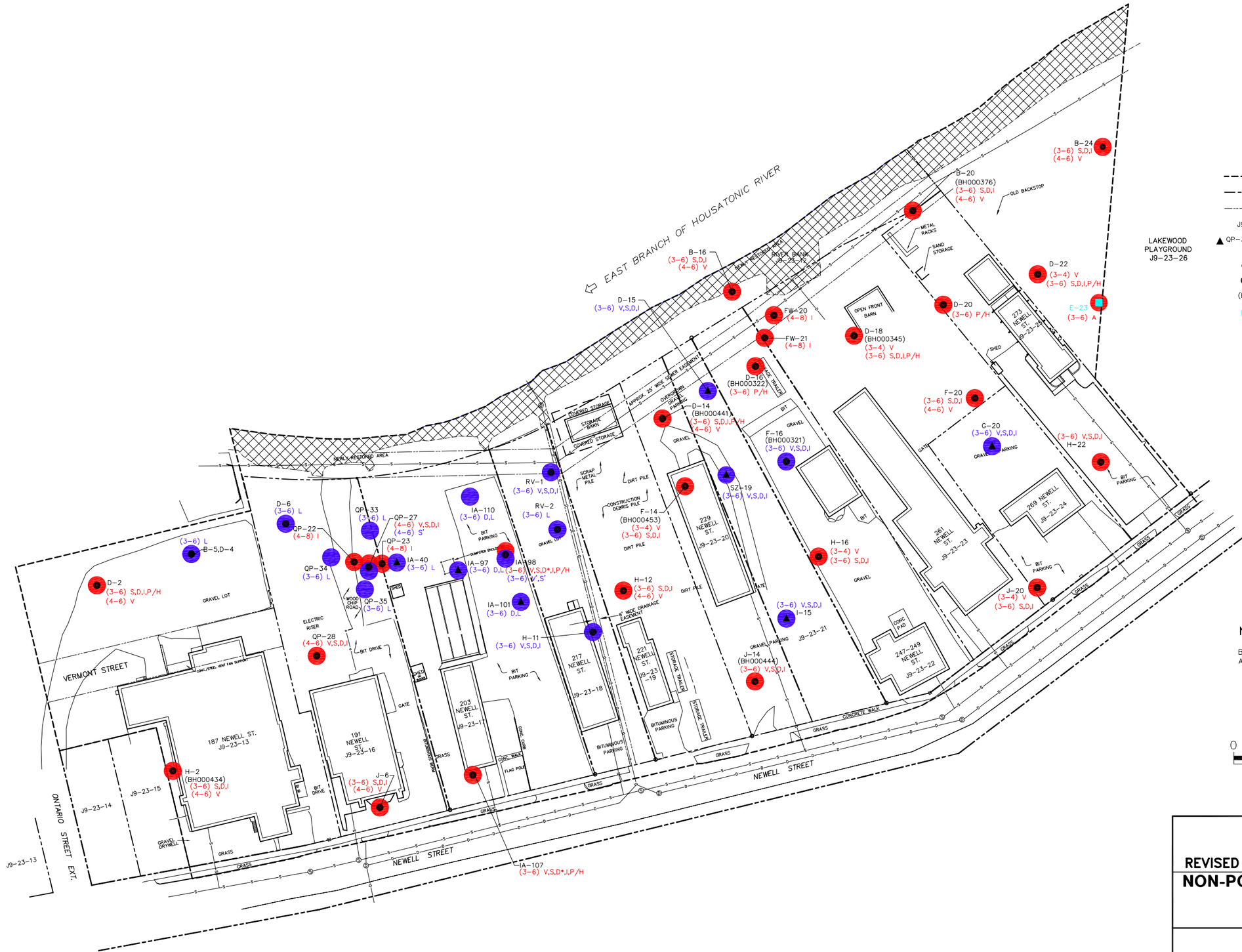
X: 10112X02.DWG
L: ON=*, OFF=REF
P: PAGESET/PLT-DL
8/20/02 SYR-54-LJP JER NES
C/10112003/10112P04.DWG

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I
REVISED SUPPLEMENTAL SAMPLING PROPOSAL

NON-PCB SOIL SAMPLE LOCATIONS WITHIN 1- TO 3-FOOT DEPTH INCREMENT

BLASLAND, BOUCK & LEE, INC.
engineers & scientists

FIGURE
3



LEGEND:

- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- EASEMENT
- J9-23-23 PARCEL ID
- ▲ QP-30 OR ● 6E3 GE EXISTING SURFACE SOIL SAMPLE LOCATION
- ● MM-3 GE EXISTING SOIL BORING LOCATION
- ● BH000467 EPA SOIL BORING LOCATION
- (BH000321) EPA SPLIT SAMPLE IDENTIFICATION
- ■ E-23 EXISTING SOIL SAMPLE LOCATION USED TO SATISFY ADDITIONAL ARSENIC ANALYSIS
- EXISTING APPENDIX IX+3 SAMPLE LOCATION
- PROPOSED APPENDIX IX+3 SAMPLE LOCATION

A = ARSENIC SAMPLE
D = DIOXIN/FURAN SAMPLE
D* = REJECTED DIOXIN/FURAN SAMPLE
I = INORGANIC COMPOUNDS SAMPLE
L = LEAD SAMPLE
P/H = PESTICIDES/HERBICIDES SAMPLE
S = SEMI-VOLATILE ORGANIC COMPOUNDS SAMPLE
S' = SELECT SEMI-VOLATILE ORGANIC COMPOUNDS SAMPLE. (SEE TABLE 2 FOR LIST OF CONSTITUENTS PROPOSED FOR ANALYSIS)
V = VOLATILE ORGANIC COMPOUNDS SAMPLE
V' = SELECT VOLATILE ORGANIC COMPOUNDS SAMPLE (SEE TABLE 2 FOR LIST OF CONSTITUENTS PROPOSED FOR ANALYSIS)
V* = 1,2-DCB, 1,3-DCB, 1,4-DCB SAMPLES

NOTES:

BASE MAP MODIFIED FROM SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS, DATED 8/15/01.

0 100' 200'
GRAPHIC SCALE

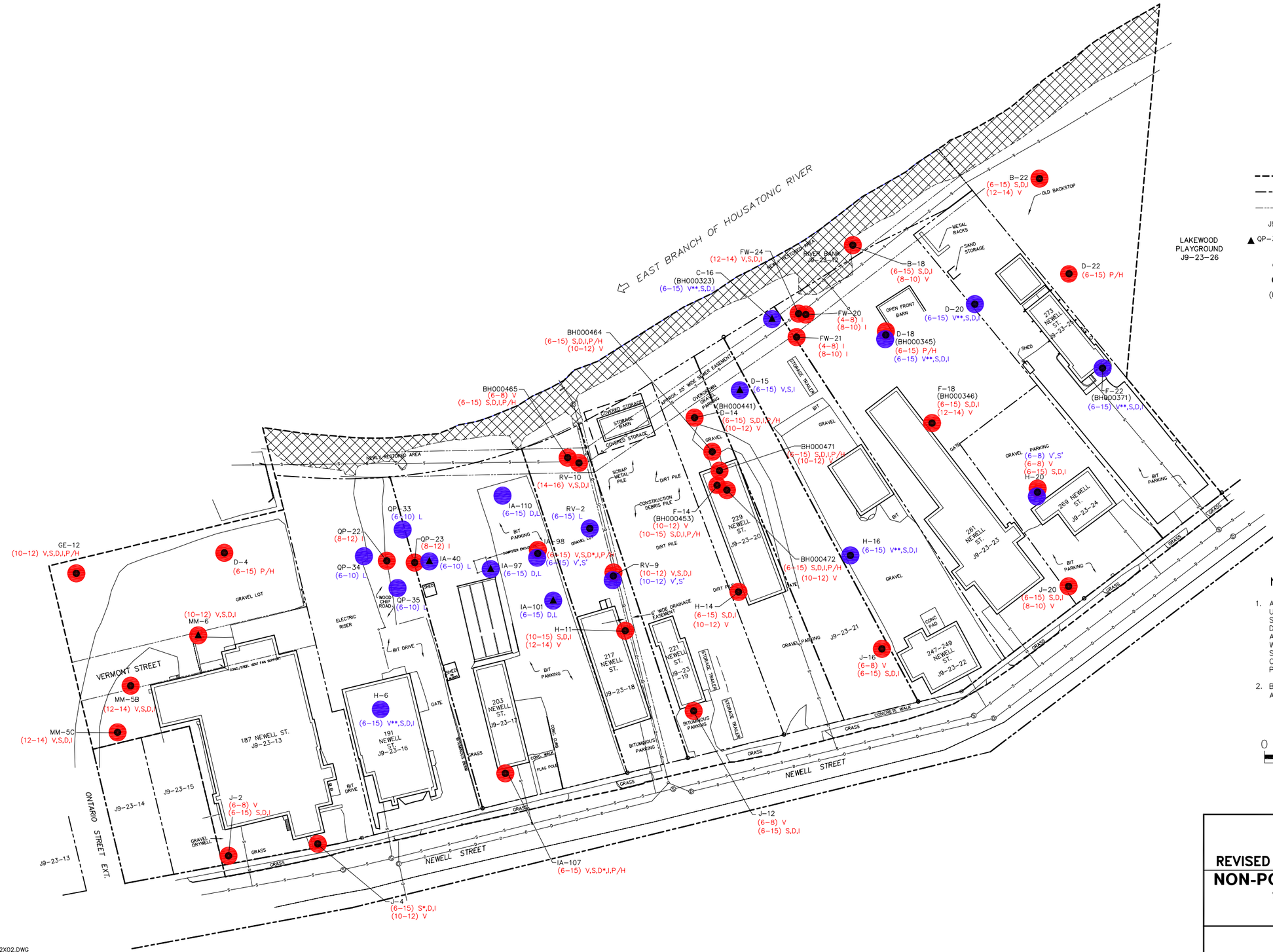
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I
REVISED SUPPLEMENTAL SAMPLING PROPOSAL

NON-PCB SOIL SAMPLE LOCATIONS WITHIN 3- TO 6-FOOT DEPTH INCREMENT

BLASLAND, BOUCK & LEE, INC.
engineers & scientists

FIGURE 4

X: 10112X02.DWG
L: ON=*, OFF=REF
P: PAGESET/PLT-DL
8/20/02 SYR-54-LJP LJP NES
C/10112003/10112P05.DWG



LEGEND:

- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- EASEMENT
- J9-23-23 PARCEL ID
- ▲ QP-30 OR ● 6E3 GE EXISTING SURFACE SOIL SAMPLE LOCATION
- ● MM-3 GE EXISTING SOIL BORING LOCATION
- ● BH000467 EPA SOIL BORING LOCATION
- (BH000321) EPA SPLIT SAMPLE IDENTIFICATION
- EXISTING APPENDIX IX+3 SAMPLE LOCATION
- PROPOSED APPENDIX IX+3 SAMPLE LOCATION

A = ARSENIC SAMPLE
D = DIOXIN/FURAN SAMPLE
D* = REJECTED DIOXIN/FURAN SAMPLE
I = INORGANIC COMPOUNDS SAMPLE
L = LEAD SAMPLE
P/H = PESTICIDES/HERBICIDES SAMPLE
S = SEMI-VOLATILE ORGANIC COMPOUNDS SAMPLE
S' = SELECT SEMI-VOLATILE ORGANIC COMPOUNDS SAMPLE. (SEE TABLE 2 FOR LIST OF CONSTITUENTS PROPOSED FOR ANALYSIS)
V = VOLATILE ORGANIC COMPOUNDS SAMPLE
V' = SELECT VOLATILE ORGANIC COMPOUNDS SAMPLE (SEE TABLE 2 FOR LIST OF CONSTITUENTS PROPOSED FOR ANALYSIS)
V* = 1,2-DCB, 1,3-DCB, 1,4-DCB SAMPLES
V** = VOLATILE ORGANIC COMPOUND SAMPLE FOR ONLY THE 2 -FOOT DEPTH INCREMENT WITH THE HIGHEST PID READING

NOTES:

1. ACCESS/CLEARANCE LIMITATIONS MAY PREVENT THE USE OF A DRILL RIG TO COLLECT THE SUBSURFACE SAMPLES AT LOCATIONS H-6, F-18B AND H-18B. IF DRILL RIG ACCESS IS NOT POSSIBLE, GE WILL EITHER ATTEMPT TO MANUALLY COLLECT THESE SAMPLES OR WILL ATTEMPT TO COLLECT THE REQUIRED SOIL SAMPLES AT A SOIL BORING LOCAITON IMMEDIATELY OUTSIDE THE BUILDING IN CLOSE PROXIMITY TO THE PROPOSED BORING LOCATION.
2. BASE MAP MODIFIED FROM SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS, DATED 8/15/01.

0 100' 200'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA I
REVISED SUPPLEMENTAL SAMPLING PROPOSAL

NON-PCB SOIL SAMPLE LOCATIONS WITHIN 6- TO 15-FOOT DEPTH INCREMENT

BLASLAND, BOUCK & LEE, INC. engineers & scientists

FIGURE 5

X: 10112X02.DWG
L: ON=*, OFF=REF
P: PAGESET/PLT-DL
8/14/02 SYR-54-LJP PGL LJP
C/10112003/10112P06.DWG