

1.0 Overview:

During March 2002, General Electric Company (GE) and its contractor Maxymillian Technologies Incorporated (MTI) continued work on the Upper ½ Mile Reach Removal Action. The primary work included completing work tasks associated with Cell J1, completing river restoration activities for Cell J2, and initiating soil and sediment removal activities for Cell I2.

Weekly status meetings were held on March 4, 11, 19, and 25, 2002.

2.0 Chronological description of the tasks performed:

Refer to the figure (Exhibit A) referenced in Section 4.0 and attached to this report for an orientation of the sheetpile cells and their respective locations.

Restoration activities for Cell J2 were continued from February and completed during the first week of March. To complete the river restoration, 4 habitat enhancement boulders were placed in the downstream portion of the cell (with oversight by the Massachusetts Executive Office of Environment Affairs [EOEA]). In addition, restoration activities were completed for the bank area. Bank restoration activities included placing rip-rap at the toe-of-the-bank to the design elevation and at 1:1 bank slope areas. Further up the bank above the rip-rap, the excavation areas were backfilled with soil and compacted. A 6-inch layer of topsoil was placed over the backfill, followed by placement of grass seed and erosion mats. Following completion of a post-restoration final survey for Cell J2 (submitted to EPA and US Army Corp of Engineers (ACE)), the dewatering pumps were removed and the cell was allowed to flood. The cutoff wall sheetpiles were removed from the river, cleaned at the top of the bank, and stockpiled. In addition, the Cell J1 non-removal bank areas were restored by placing grass seed, installing erosion control fabric and mulch for the top layer.

During the second week of March, work efforts were shifted to Cell I2 on the south side of the river. The cutoff sheetpile wall installation was completed for Cell I2 this week. The sheetpile installation was initiated by raising the embedded sheetpiles at the upstream end of Cell I2. The cell was closed off by installing the downstream sheetpiles connecting the existing centerline sheetpile wall into the bank. During sheetpile installation on March 14, a sheen was observed on the surface water. On the same date, GE verbally reported this observation to EPA, MDEP, and the NRC (the NRC issued Tracking Number 596515). In response to this observation, oil-absorbent pads were placed around the sheen and the cell water was transferred to GE's on-site water treatment system. Sheetpile installation activities were continued in Cell I2 while observing for the potential presence of additional sheens. Following installation of the Cell I2 cutoff sheetpile walls, the primary sump pump system was installed and the cell was fully dewatered. After Cell J1 was dewatered, a baseline survey was performed to record existing elevations.

During the third week of March, soil and sediment excavation activities were initiated in Cell I2. Material excavated from Cell I2 was transported by truck to Buildings 33 (non-TSCA) and 33X (TSCA) for stockpiling prior to final disposal in the appropriate On Plant Consolidation Area (OPCA). During sediment removal activities, a small amount of NAPL and a sheen were observed on March 20, 2002, on the bottom of the excavation near the upstream cutoff sheetpile wall in Cell I2. On the same date, GE verbally reported this observation to EPA, MDEP, and the NRC (the NRC issued Tracking Number 597084). In response to this observation, oil-absorbent pads were placed at the upstream pump intake for the water handling system that transferred the water to GE's on-site water treatment system. Excavation activities continued while observing for additional signs of NAPL. A similar situation occurred a week later during sediment removal activities. On March 27, 2002, a small amount of NAPL and a sheen were observed on the bottom of the excavation near the downstream cutoff sheetpile wall. On the same date, GE verbally reported this observation to EPA, MDEP, and the NRC (the NRC issued Tracking Number 597754). In response to this observation, oil-absorbent pads were placed at the downstream pump intake for the water handling system that transferred the water to GE's on-site water treatment system. Excavation activities were resumed while observing for additional signs of NAPL.

In addition, during the third week of March, approximately 600 cubic yards of DNAPL-impacted material (removed from Cell J1 and temporarily stockpiled in Building 65) was transported off site for appropriate disposal. The existing Building 65 stockpile area was then deconstructed and removed.

During the fourth week of March, removal activities in Cell I2 were continued. Sediment excavation in the Cell I2 riverbed was completed to the Work Plan limits. In addition, sediment was removed to a depth of 1-foot from the non-removal riverbed areas near the former tie in buffer at downstream part of Cell I2 adjacent to the bank in response to an EPA request. Since the riverbed excavation was extended completely to the bank, the tie in buffer was no longer necessary and was removed. Bank soil removal activities were also completed including excavating and shaping swale No. 10. Following completion of excavation to the Work Plan removal limits, a post-removal survey was performed to record the removal elevations.

Additional activities were also completed during the fourth week of March. The low lifting holes on the Cell I2 sheetpiles were plugged in preparation for a potential flood event. To address a depression in the riverbed, rip rap was placed at the former Cell J2 upstream cutoff wall on the north side of the river. Also, in preparation for additional sediment removal to address NAPL-impacted sediment in Cell I2, a new stockpile area (for NAPL-material) was constructed in Building 65 and the sump pump was lowered at the downstream end of Cell I2.

Work tasks associated with the Cell J1 Waterloo barrier wall were also completed during the fourth week of March. The proposed locations of the Cell J1 Waterloo barrier wall monitoring wells were surveyed and staked out. With EPA approval and oversight, three

monitoring wells associated with the Waterloo barrier wall were installed at the top of the bank in Cell J1.

Air monitoring for particulate matter was conducted on a daily basis during March. The monthly PCB air monitoring event was conducted on March 20 and 21, 2002. Water column [PCB and total suspended solids (TSS)] monitoring was also continued during removal activities in the month of March.

During the month of March, GE Buildings 33X and 33-north were used as temporary storage facilities for Toxic Substances Control Act (TSCA) material and non-TSCA material, respectively, prior to final disposition at the appropriate On-Plant Consolidation Area (OPCA). In addition, Building 65 was used as temporary storage area for DNAPL-impacted material. At the beginning of March, Cell J1 DNAPL-impacted material was temporarily stockpiled in Building 65 and subsequently transported off site of appropriate disposal. At the end of March, DNAPL-impacted material removed from Cell I2 was temporarily stockpiled in Building 65.

Lyman Street Source Control Activities

No work was performed during this period. Work tasks associated with the Lyman Street source control activities will resume when work tasks are initiated for Cell J3.

3.0 Sampling/test results received:

Table 1 presents general backfill PCB results for samples collected at the source.

Tables 2A and 2B present the daily water column monitoring results for turbidity and the results of the water column samples collected for TSS and PCB analysis.

Table 3 presents the Cell G3 1-year isolation layer monitoring TOC sample results.

Table 4 presents Cell J1 DNAPL-impacted material disposal characterization PCB sample results.

Table 5 presents Cell J1 DNAPL-impacted material disposal characterization VOC and SVOC sample results.

Table 6 presents Cell J1 DNAPL-impacted material disposal characterization TCLP sample results.

Table 7 presents waste characterization sample results for Cell J1 unknown drum.

Table 8 presents ambient air monitoring results for particulate matter for March.

Table 9 presents ambient air monitoring results for PCBs for monitoring event conducted on March 20 and 21, 2002.

4.0 Diagrams associated with the tasks performed:

A figure presented as Exhibit A shows the location and the progress of work for Cells H, I, and J along the Upper ½ Mile Reach and is attached to this report for reference.

A summary chart (Exhibit B) has been developed to assist in tracking the analytical and physical testing requirements of the various sources of backfill (e.g., isolation material, soil back fill, riprap rock, etc.). Exhibit B includes the source, type and quantity of backfill materials used, information for the analytical and physical testing required by the Work Plan, and the source backfill sampling that has been performed to date.

5.0 Identification of reports received and prepared:

During the month of March, meeting summaries from the weekly project status meetings were submitted. Also, for work completed in February 2002, the monthly reports required by the Consent Decree and the Upper ½-Mile Reach Removal Action Work Plan were both submitted. In addition, during March, GE submitted the following documents:

- Letter regarding *Proposal for Assessment Impact of High Flow Conditions in Vicinity of Cell G2 Sheetpile Containment Barrier*, dated March 20, 2002.
- *2001 Annual Monitoring Report Addendum* dated March 21, 2002.
- Additional TOC laboratory data packages associated with the isolation layer cap.
- Meeting Summaries for weekly project status meetings.

6.0 Photo documentation of activities performed:

- See attached Figure 1.

7.0 Brief description of work to be performed in March 2002:

For the next reporting period, the following activities are anticipated to be performed:

- Initiate and complete NAPL-impacted sediment removal activities for Cell I2.
- Complete river and bank restoration activities for Cell I2.
- Perform Cell I2 final restoration survey.

- Mobilize material and equipment to Cell I3.
- Complete installation of cutoff sheetpiles for Cell I3.
- Initiate removal activities for Cell I3.
- Initiate monitoring well program associated with Cell J1 Waterloo barrier wall.
- Install high flow event data loggers in wells in vicinity of Cell G2 sheetpile containment barrier (monitoring activities to be reported under GMA-1 activities.
- Maintain temporary stockpiles of material in Buildings 33-north, 33X, and 65 (non-TSCA, TSCA, and DNAPL-impacted material, respectively);
- Complete off-site disposal of Cell I2 DNAPL material stockpiled at the Building 65 stockpile area; and
- Continue to conduct air monitoring and water column monitoring associated with response activities for the Upper ½-Mile Reach.

8.0 Attachments to this report:

Table 1 – General backfill PCB results for samples collected at the source.

Table 2A – Daily water column monitoring results.

Table 2B – Water column samples for TSS and PCB analyses.

Table 3 – Cell G3 1-year isolation layer monitoring TOC sample results.

Table 4 – Cell J1 DNAPL-impacted material disposal characterization PCB sample results.

Table 5 – Cell J1 DNAPL-impacted material disposal characterization VOC and SVOC sample results.

Table 6 – Cell J1 DNAPL-impacted material disposal characterization TCLP sample results

Table 7 – Waste characterization sample results for Cell J1 unknown drum.

Table 8 - Results of the March ambient air monitoring for particulate matter.

Table 9 - Ambient air monitoring results for PCBs for monitoring event in March.

Exhibit A – Figure showing the progress of work within the Upper ½-Mile Reach.

Exhibit B – Backfill quantity and sample summary chart.

Figure 1 - Photo documentation.