

1.0 Overview:

During July 2002, General Electric Company (GE) and its contractor Maxymillian Technologies Incorporated (MTI) continued work on the Upper ½ Mile Reach Removal Action. The primary river work included completing soil and sediment excavation activities in Cell J3. During performance of removal activities in Cell J3, NAPL was observed at upstream and downstream locations and following additional excavation (with EPA oversight) to address these areas, the NAPL was successfully removed. In addition, grouting activities associated with the Cell J3 Waterloo barrier wall were completed during the month of July.

Weekly status meetings were held on July 1, 8, 15, 22, and 29, 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.

At the beginning of July, following completion of removal and restoration activities in Cell I3 (during June), a post-restoration survey was performed to record final restored elevations. In addition, closure activities were completed for Cell I3 including the removal of the dewatering system and removal of the cutoff sheetpile walls.

At the end of the first week, work efforts were shifted to Cell J3. Installation of the cutoff wall sheetpiles that form Cell J3 were completed along the north side of the river on the upstream side of the Lyman Street Bridge. Cell J3 was formed at approximately 400 feet in length (longer than the 300-foot length originally planned). The dewatering system was installed and the cell was dewatered. At the request of EPA, all water from the cell was sent to the on-site water handling system for treatment (instead of initially being pumped directly into the river). A pre-removal baseline survey was then performed to record the existing elevations in the cell.

To begin the second week of July, oil booms located in the river along the edge of the bank of Cell J3 were removed from the river and placed in 55 gallon drums for appropriate disposal. Additionally, bank soil excavation activities at the upstream portion of cell were completed. Soil and sediment were removed and loaded into trucks on the north side of the river. The excavated material was transported to Buildings 33-X (TSCA) and 33-North (non-TSCA) for stockpiling prior to final disposal in the appropriate On Plant Consolidation Area (OPCA). At the request of EPA, the riverside joints of the Waterloo barrier wall were sealed with foam prior to performing sediment removal activities. River sediment excavation activities were then initiated in Cell J3.

During performance of sediment removal in Cell J3, a small amount of NAPL was again observed on July 11, 2002, weeping through a joint at the base of the Waterloo wall on the bottom of the excavation. In response to this observation, an earthen berm was

constructed around the NAPL. EPA collected a sample of NAPL on this date from this location and submitted it for laboratory analysis.

On July 12, 2002, during sediment removal near the upstream end of Cell J3, NAPL and a sheen were observed. This observation was reported to the Agencies (the NRC issued Tracking Number 616417). A sample was collected by GE from this upstream location and submitted for laboratory analysis. NAPL-impacted sediment removed from this area was transferred to a newly constructed stockpile area in Building 65. Sediment excavation was continued while observing for additional signs of NAPL and sheens.

During the third week of July, Cell J3 riverbed sediment removal activities were continued toward the downstream portion of the cell. On July 19, 2002, a small amount of NAPL and sheen were observed on the bottom of the excavation near the downstream cutoff wall and was reported to the Agencies (the NRC issued Tracking Number 617167). In response, excavation activities were temporarily suspended in this area. When excavation activities continued in this area, on July 23, 2002, NAPL was observed again at the base of the excavation near the previous downstream location. In response to this observation, an earthen berm was constructed around the NAPL. A sample of NAPL was collected from this downstream location and submitted for laboratory analysis. Both EPA and MDEP were verbally notified of a potential Force Majeure based on the occurrence of NAPL in Cell J3. The third week of July ended by beginning flushing activities for the joints of the Waterloo barrier wall.

During the fourth week of July, sediment excavation activities were completed to Work Plan removal limits in Cell J3. At the request of EPA, additional soil/sediment was removed (beyond Work Plan limits) by excavating additional material at Removal Areas E and F on the riverside of the Waterloo wall. A post-removal survey was then performed to record Work Plan removal elevations. Additional sediment removal activities were initiated to address the presence of NAPL at the downstream area of the cell. With EPA approval and oversight, approximately 30 CY of NAPL-impacted sediment was removed from the affected area, which, based on visual observation, successfully removed the NAPL from the river bottom. The downstream NAPL-removal area and the bank area adjacent to the Lyman Street Bridge foundation were then backfilled with soil to provide stability for the Waterloo wall and bridge. In addition, flushing of the Waterloo sheetpile joints was completed to prepare for grouting activities.

During the fifth week of August, removal activities to address the presence of NAPL in Cell J3 were continued. With EPA approval and oversight, approximately 60 cubic yards (cy) of NAPL-impacted sediment was removed from two affected areas at the upstream portion of the cell, which, based on visual observation, successfully removed the NAPL from the river bottom. The NAPL-removal area was then backfilled with washed stone to address potential water control concerns. Later in the week, grouting activities for the Waterloo sheetpile joints were completed. Following completion of grouting activities, at the request of EPA, additional soil/sediment excavation (beyond Work Plan limits) was performed by removing an additional 3-inches of sediment at the base of the Waterloo

wall on the riverside where NAPL had seeped through the joints of the Waterloo wall during flushing activities.

Sampling/monitoring activities completed during the month of July included collecting 1-year isolation layer samples from Cell F3 to provide data for the isolation layer monitoring. A NAPL sample was collected from the upstream area of Cell J3 and submitted for PCB, VOC, and SVOC analysis. To provide disposal characterization data prior to disposal in the OPCA, a wipe sample was collected from Waterloo sheetpile debris and submitted for PCB analysis. A soil sample for disposal characterization was collected from the bank near Cell I1/Newell Street parking area and was submitted for laboratory analysis of VOCs. Also, a NAPL sample was collected from the Cell J3 downstream area and submitted for analysis of PCBs, VOCs, SVOCs, density, surficial tension, and viscosity. In addition, samples were collected from the Cell I3 NAPL-impacted material stockpiled in Bldg. 65 and submitted for disposal characterization analysis.

Control activities to treat and remove invasive vegetative species along the banks of the Upper 1/2 Mile Reach were also continued during the month of July.

Air monitoring for particulate matter was conducted on a daily basis during July. The monthly PCB air monitoring event was performed July 11-12, 2002. Water column [PCB and total suspended solids (TSS)] monitoring was also continued during removal activities in the month of July.

During the month of July, GE Buildings 33X and 33-north were used as temporary storage facilities for TSCA material and non-TSCA material, respectively, prior to final disposition at the appropriate OPCA. In addition, Building 65 was used as temporary storage area for NAPL-impacted material prior to off-site disposal. Transfer of Cell I3 NAPL-impacted material (stockpiled in Building 65) was completed for off-site disposal. The Cell I3 stockpile area was then deconstructed and removed. A new staging area was constructed to stockpile NAPL-impacted sediment removed from Cell J3.

3.0 Sampling/test results received:

Table 1 presents PCB, VOC, and SVOC disposal characterization sample results for NAPL-impacted sediment removed from Cell I3.

Table 2 presents TCLP disposal characterization sample results for NAPL-impacted sediment removed from Cell I3.

Tables 3A and 3B present the daily water column monitoring results for turbidity and the results of the water column samples collected for TSS and PCB analysis.

Table 4 presents the PCB wipe sample result for Waterloo sheetpile debris.

Table 5 presents PCB and TOC sample results for 1-year isolation layer samples collected from Cell F3.

Table 6 presents VOC disposal characterization sample results for bank soil collected from Cell I1.

Table 7 presents PCB, VOC, and SVOC sample results for NAPL collected at the upstream area in Cell J3.

Table 8 presents ambient air monitoring results for PCBs for the July monitoring event conducted on July 11 and 12, 2002.

Table 9 presents ambient air monitoring results for particulate matter in July.

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. As shown on the figure, work tasks have been completed for the rest of the Upper Half Mile Reach and are currently being performed in Cell J3 (green).

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, information regarding 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 July, meeting summaries from the weekly project status meetings were submitted. Also, for work completed in June 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 July, GE submitted the following documents:

- Letter report regarding *Erosion Inspection Following High Flow Event*, dated July 19, 2002.
- Letter report regarding *Building 68 Area Final Activities* dated July 24, 2002.
- Letter report regarding *May 2002 Vegetation Monitoring*, dated July 25, 2002.

6.0 Photo documentation of activities performed:

- See attached Figure 1.

7.0 Brief description of work anticipated to be performed in August 2002:

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

- Collect samples from Cell J3 as part of baseline isolation layer monitoring.
- Initiate and complete restoration activities for Cell J3.
- Complete installation of habitat enhancement structures for Cell J3.
- Complete removal and restoration of bank soil near Cell I1 and Newell Street parking area.
- Perform transition activities to close (GE's) Upper Half Mile Reach and begin (EPA's) 1.5 Mile Reach.
- Perform summer 2002 vegetation monitoring event.
- Maintain temporary stockpiles of material in Buildings 33-north, 33X, and 65 (non-TSCA, TSCA, and DNAPL-impacted material, respectively);
- Collect disposal characterization samples and complete transfer of Cell J3 NAPL material (stockpiled at the Building 65 storage area) for off-site disposal; and
- Continue to conduct air monitoring and water column monitoring associated with response activities for the Upper ½-Mile Reach Removal Action.

8.0 Attachments to this report:

Table 1 – Cell I3 NAPL-sediment disposal characterization sample results.

Table 2 – Cell I3 NAPL-sediment TCLP sample results.

Table 3A – Daily water column monitoring results.

Table 3B – Water column samples for TSS and PCB analyses.

Table 4 – Wipe sample PCB results for Waterloo sheetpile debris.

Table 5 – 1-year isolation layer material sample results for Cell F3.

Table 6 – Bank soil VOC sample results for Cell I1.

Table 7 – Sample results for NAPL collected at upstream Cell J3.

Table 8 – Results of the July ambient air monitoring for PCBs.

Table 9 – Results of the July ambient air monitoring for particulate matter.

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

Exhibit B – Backfill sampling chart.

Figure 1 - Photo documentation.