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Transmitted via Overnight Delivery

October 27, 2006

Susan Steenstrup
Section Chief, Special Projects
MA Dept. of Environmental Protection
436 Dwight Street
Springfield, MA 01103

**Re: Housatonic River - West Branch (Site Number GESD02)
Addendum to Second Supplemental Sampling Summary Report and Remedial Action
Proposal for the West Branch of the Housatonic River**

Dear Ms. Steenstrup:

On April 12, 2006, the General Electric Company (GE) submitted to the Massachusetts Department of Environmental Protection (MDEP) a document titled *Second Supplemental Sampling Summary Report and Remedial Action Proposal for the West Branch of the Housatonic River* (Second Supplemental Report). That report represented the continuation of a series of submittals relating to investigations of the West Branch of the Housatonic River and certain adjacent areas, focusing in particular on the portion of the West Branch and lower riverbanks adjacent to Dorothy Amos Park, which is owned by the City of Pittsfield. (The upland and upper riverbank portions of that park had been remediated by GE in 1998.) The Second Supplemental Report presented the results of the supplemental sediment and groundwater investigations conducted by GE in March 2006; summarized the existing data sets for sediments, lower riverbank soils, surface water, and groundwater; and provided a conceptual remedial action proposal to address polychlorinated biphenyls (PCBs) in lower riverbank soils and sediments of the West Branch adjacent to Dorothy Amos Park.

MDEP provided conditional approval of the Second Supplemental Report in a letter to GE dated September 29, 2006. That letter included several conditions related to GE's conceptual remedial action proposal for the lower riverbank soils and sediments, and also required the performance of additional sampling and analyses activities for non-PCB constituents. GE does not agree with a number of the conditions set forth in MDEP's letter. Moreover, GE does not concede that the PCBs or other constituents that have been or may be found in the West Branch and adjacent areas derive from fill material or other waste material that came from the GE facility in Pittsfield. GE preserves its positions on these issues. Nevertheless, in the interest of moving this project forward GE is submitting this *Addendum to the Second Supplemental Sampling Summary Report and Remedial Action Proposal for the West Branch of the Housatonic River* (Addendum to the Second Supplemental Report), in accordance with Condition No. 5 of MDEP's September 29, 2006 letter, to address the other conditions in the MDEP's letter.

Specifically, this Addendum provides: (1) revised PCB evaluations and a revised PCB remediation proposal for the lower riverbank soils; (2) a proposal for surface water monitoring to be implemented during performance of sediment removal activities; (3) a revised proposal for remediation of the sediments adjacent to Dorothy Amos Park; and (4) a proposal for the collection and analysis of lower riverbank soil samples for analysis of the non-PCB constituents listed in 40 CFR Part 264 (excluding pesticides and herbicides), plus benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine (Appendix IX+3). In each of the following sections, this Addendum repeats the pertinent MDEP condition and then describes the information or proposal developed by GE to address that condition.

A. Riverbank Soil Remediation

MDEP Condition No. 1 – *In Section 3 of the Report, GE proposes to remove soils, as necessary, to achieve a spatial average PCB concentration of 10 parts per million (ppm) in both the top foot and in the top 3 feet of the bank. The proposed remediation standard of 10 ppm is based on the assumption that the riverbanks can be considered to be recreational in use, with no foreseeable use for residential purposes due to their proximity to the river and steep slope. Under the Massachusetts Contingency Plan (MCP), if the average concentration of PCBs does not meet the Method 1 Soil Standard of 2 ppm, then a Notice of Activity and Use Limitation (AUL) must be implemented to restrict activities and uses at the site to those for which the cleanup levels are protective.*

To support the 10 ppm Performance Standard for the riverbanks, GE cited the risk evaluation performed by EPA to support the recreational performance standards in the CD. There is no PCB Performance Standard in that risk evaluation for the 0- to 3-foot depth interval at recreational properties where the property use has been restricted. Rather, the risk evaluation established a 15 ppm PCB soil Performance Standard for the 1- to 3-foot depth interval. Therefore, on these riverbanks, if AULs are obtained rather than cleaning the riverbanks to the 2 ppm Method 1 Soil Standard, GE shall apply the 10 ppm PCB soil Performance Standard to the 0- to 1-foot depth interval and apply the 15 ppm PCB soil Performance Standard to the 1- to 3-foot depth interval. GE shall submit an Addendum to the Report in the timeline specified below that includes an evaluation of the 1- to 3-foot depth interval and a comparison of the results of the evaluation to the 15 ppm standard.

GE Response – GE continues to believe that remediation of the lower riverbanks adjacent to Dorothy Amos Park to standards that are safe for recreational use would be fully protective, even in the absence of an AUL, because those banks have no foreseeable use for less restrictive (i.e., residential) purposes due to their proximity to the river and steep slope. Nevertheless, in response to MDEP's directive, GE has developed two alternative approaches for remediation of the lower riverbanks to address PCBs – one to achieve recreational standards if an AUL is obtained, and one to achieve the MCP Method 1 soil standard of 2 ppm on those lower banks if an AUL is not obtained. Following receipt and review of the sampling data on non-PCB constituents in the lower riverbanks (as described in Section D below) and further evaluation of all the data, GE will determine which of these approaches it plans to implement and will specify the selected approach in its forthcoming Remedial Action Work Plan (RAWP) (discussed in Section E below).

Remediation to Recreational Standards

The PCB evaluation procedures presented in the Second Supplemental Report involved comparison of the spatial average PCB concentrations in the 0- to 1-foot and 0- to 3-foot depth increments on the lower riverbanks to a soil remediation standard of 10 ppm. MDEP's Condition No. 1 states that, if an AUL is obtained, GE should apply a soil remediation standard of 15 ppm for the 1- to 3-foot depth increment instead of a standard of 10 ppm for the 0- to 3-foot depth increment. In response, GE has prepared an evaluation of the 1- to 3-foot depth increment for comparison to the 15 ppm soil remediation standard. GE has also included herein the evaluation of the 0- to 1-foot depth increment for ease of reference. The revised PCB evaluations and polygon mapping for the lower riverbank soils under this remediation approach are presented in Attachment A and summarized below.

[Note: The Second Supplemental Report included polygon mapping for the 0- to 0.5-foot, 0.5- to 1-foot, 1- to 2-foot, and 2- to 3-foot depth increments. However, in preparing this Addendum, GE has combined the polygon mapping previously prepared for the 0- to 0.5-foot and 0.5- and 1-foot depth increments. Similarly, the polygon mapping for depths greater than 1 foot have been combined since the polygon maps for the 1- to 2-foot and 2- to 3-foot depth increment are identical. As a result, Attachment A includes polygon maps for the 0- to 1-foot depth increment (Figure A-1) and the greater than 1 foot depth increment (Figure A-2). The existing and post-remediation PCB averaging evaluations for this approach have been modified to be consistent with the polygon mapping included herein.]

As shown in the following table, the existing average PCB concentrations for the 0- to 1-foot and 1- to 3-foot depth increments are greater than the soil remediation standards of 10 ppm and 15 ppm, respectively.

Depth Increment	Attachment A Table Reference	Existing Average PCB Concentration (ppm)	Recreational Remediation Standard (ppm)
0-1'	A-1	143.9	10
1-3'	A-2	65.2	15

Similar to the finding presented in the Second Supplemental Report, soil removal is necessary to achieve the soil remediation standards for these depth increments. That report identified several sampling locations in the top three feet where soil removal was proposed to achieve the soil remediation standards specified therein. The revised evaluations in Attachment A indicate that removal of the soil attributed to those same samples will also result in the achievement of the soil remediation standard of 15 ppm for the 1- to 3-foot depth increment, as shown in the following table.

Depth Increment	Attachment A Table Reference	Post-Remediation Average PCB Concentration (ppm)	Recreational Remediation Standard (ppm)
0-1'	A-3	5.1	10
1-3'	A-4	6.0	15

In addition to the soil removals to achieve the above standards, GE proposed in the Second Supplemental Report to perform some additional removal to address elevated PCB concentrations at three locations in the 3- to 4-foot depth increment (i.e., DARB-2, DARB-5, and DARB-15). GE further explained that soil removal limits for these three sample locations were developed by extending the 2- to 3-foot depth removal polygons in these areas down to 4 feet. However, the soil removal limits associated with the 3- to 4-foot depth increment at sample location DARB-5 were inadvertently developed using the polygon for the 0- to 0.5-foot depth increment instead of the polygon for the 2- to 3-foot depth increment (which is slightly smaller). GE has revised the soil removal limits at this location to be based on a downward extension of the 2- to 3-foot depth removal polygon.

This modification has resulted in a slight change in the estimated soil removal volume associated with this remediation – from approximately 100 cubic yards (as stated in the Second Supplemental Report) to approximately 85 cubic yards. The revised soil removal limits are presented on Figure 1. As shown above, those limits will result in achievement of the recreational standards for the 0- to 1-foot and 1- to 3-foot depth increments. In addition, as it did in the Second Supplemental Report, GE has calculated the post-remediation spatial average concentration for the overall depth increment that extends to the depth of detection of PCBs on these riverbanks – 6 feet. As shown in Table A-5 in Attachment A, that post-remediation average is 4.9 ppm, which is less than both the MCP Upper Concentration Limit (UCL) of 100 ppm for PCBs and the recreational soil remediation standard of 10 ppm for the top foot.

Remediation to Method 1 Standard

In the event that an AUL is not obtained for the lower riverbanks, GE will remediate the lower riverbank soils to achieve the MCP Method 1 soil standard of 2 ppm for PCBs. To determine the soil removal limits necessary to achieve that standard, GE has evaluated the depth increments used to assess residential properties – i.e., the 0- to 1-foot depth increment and the greater than 1 foot depth increment (to the depth at which PCBs have been detected). In this case, since PCBs have been detected on the lower riverbanks to a depth of 6 feet, the depth increments subject to evaluation are the 0- to 1-foot and 1- to 6-foot depth increments. The PCB evaluations and polygon mapping for the lower riverbank soils under this remediation scenario are presented in Attachment B and summarized below.

As shown above, the existing average PCB concentration for the 0- to 1-foot depth increment (~ 144 ppm) is above the MCP Method 1 soil standard of 2 ppm. Further, as shown in Table B-2 in Attachment B, the existing average PCB concentration for the 1- to 6-foot depth increment is 57.1 ppm, which is also greater than the Method 1 standard. GE has developed a scope of soil removal and replacement to achieve the Method 1 soil standard of 2 ppm in both of these depth increments on the lower riverbanks. The soil removal limits proposed to achieve this standard are shown on Figure 2 and would involve the removal of approximately 185 cubic yards of riverbank soil. The evaluations in Attachment B indicate that soil removal to those limits would result in achievement of the Method 1 soil standard, as shown in the following table.

Depth Increment	Attachment B Table Reference	Post-Remediation Average PCB Concentration (ppm)	Method 1 Soil Standard (ppm)
0-1'	B-3	1.3	2
1-6'	B-4	1.5	2

B. Surface Water Monitoring During Remediation

MDEP Condition No. 2 – *In Section 2.4 of the Report, GE states that based on the results of surface water sampling within the West Branch, GE had concluded in reports previously submitted to the Department that there was no need for additional surface water sampling in the West Branch. The Department approved that conclusion with respect to the existing conditions in the West Branch. However, the Department will require surface water sampling during remediation at a location downstream of the sediment excavation area. GE shall include a proposal for surface water sampling to be performed concurrently with the sediment excavation in the Addendum to the Report.*

GE Response – A specific plan for water column monitoring during sediment remediation is more appropriately prepared as part of the detailed design activities related to sediment removal. As a result, GE is not able to provide a definitive plan at this time. However, to comply with this condition, GE has prepared a preliminary plan that identifies the general approach that will be implemented. That preliminary plan for surface water monitoring activities to be performed during the proposed sediment removal activities for the West Branch is provided in Attachment C. This plan is subject to modification to accommodate constructability and design issues associated with the development of the sediment remedial actions during preparation of the forthcoming RAWP.

C. Sediment Remediation

MDEP Condition No. 3 – *In Section 3.2 of the Report, GE states that it has not identified any a priori remediation standard for sediments. Instead, GE proposes to remove sediments to achieve an arithmetic average of 0.40 ppm in the top foot and 0.36 in the 0- to 3-foot depth increment. Under the MCP, a Method 3 Risk Characterization to evaluate the risk of harm to health, safety, public welfare, and the environment is required at disposal sites unless response actions have successfully reduced contaminant concentrations to background levels, as described in 310 CMR 40.0999. GE does not provide such a Risk Characterization in the Report. GE shall use one of the following three options to demonstrate that post-remediation PCB sediment concentrations will achieve a condition of No Significant Risk:*

- *Perform a Method 3 Risk Characterization to support the proposed post-remediation concentrations;*
- *Remove all PCB-contaminated sediment represented by detectable concentrations of PCBs from transect T00300 to the West Street bridge; or*
- *Remove sediments to achieve the average PCB concentrations proposed in the Report, and perform fish tissue sampling as recommended by the Department's Office of Research and Standards in a memorandum to Anna Symington dated July 24, 2006 with subject "Review of the Second Supplemental Sampling Summary Report and Remedial Action Proposal for the West Branch of the Housatonic River, Prepared by BBL, Inc., for the General Electric Company, April 2006"*

GE shall present either a Method 3 Risk Characterization, a plan to remove all contaminated sediments adjacent to the Park, or a plan to perform fish tissue sampling in the West Branch in the Addendum to the Report.

GE Response – GE continues to believe that the sediment remediation approach proposed in the Second Supplemental Report is fully protective, as well as consistent with the approach used in the Consent Decree (and agreed to by MDEP) for the Upper ½ Mile Reach of the East Branch of the Housatonic River. Nevertheless, to comply with MDEP's directive, GE has elected to implement the second bulleted option listed by MDEP – removal of all detectable concentrations of PCBs in the identified river stretch – despite the fact that this represents an overly conservative approach to sediment removal within the West Branch.

To determine the extent of removal to achieve this option, a review of the sediment sampling data was performed to identify sampling locations where detectable concentrations of PCBs were reported. Further, to assist in developing of the limits of sediment removal, a Theissen polygon map was created utilizing all available sediment sampling locations between Transect 00300 and the West Street Bridge.

The horizontal limits of soil removal were then determined by identifying each sediment sampling location and the corresponding polygon at which detectable concentrations of PCBs were reported. To determine the vertical extent of removal within each polygon, the sampling data were evaluated to determine the depth at which PCBs were not detected. The resulting limits of sediment removal and the sediment sample data are presented on Figure 3. Although MDEP's conditional approval letter only specified the removal of detectable PCB concentrations between Transect 00300 and the West Street Bridge, GE has extended the removal to address a detected PCB concentration just to the north (upriver) of Transect 00300 at sampling location DASED-26. Under this scenario, the total estimated volume of sediment removal is approximately 900 cubic yards. These sediment removal limits are preliminary; they will be further reviewed during development of the forthcoming RAWP and may be modified to incorporate constructability considerations.

D. Riverbank Sampling for Non-PCB Constituents

MDEP Condition No. 4 – *In the Report, GE did not propose sampling of riverbank soils and river sediments for the [Appendix IX+3] constituents GE shall include a proposal for Appendix IX+3 sampling of soils and sediments in the Addendum to the Report. The sampling proposal shall address riverbank soils from transect T00100 to the West Street bridge and sediments from transect T00300 to the West Street bridge. However, if option #2 under comment 3 (above) is selected, no Appendix IX+3 sampling will be required for the sediments.*

GE Response – Since GE has elected to implement MDEP's option 2 for sediment remediation, its proposal for sampling for non-PCB Appendix IX+3 constituents is limited to the lower riverbank soils. GE proposes to collect soil samples from six riverbank locations for Appendix IX+3 analyses. In selecting the locations and depths for these samples, GE has reviewed the PCB-related soil removal limits in an effort to collect the Appendix IX+3 samples from soils that could potentially remain in place after the PCB remediation. Thus, the locations and depths selected are all ones that would remain after the PCB remediation to achieve recreational standards, although a few of those sample locations would be removed by a PCB remediation to achieve the Method 1 soil standard. Specifically, GE proposes to collect soil samples for Appendix IX+3 analyses at the following locations and depth increments, as shown on Figures 1 and 2:

- DARB-12 (0-1')
- DARB-18 (0-1')
- DARB-7 (1-3')
- DARB-11 (1-3')
- DARB-5 (4-6')
- DARB-15 (4-6')

Upon receipt of MDEP and Pittsfield Conservation Commission (PCC) approval for this sampling, GE will secure access to the property and perform the proposed sampling activities. All samples will be submitted for analysis of non-PCB Appendix IX+3 constituents. All sampling, analysis, and data validation activities will be conducted in accordance with the procedures in GE's approved *Field Sampling Plan/Quality Assurance Project Plan* (FSP/QAPP).

Once the results are received, GE will evaluate the non-PCB data to assess the need for additional remediation beyond the riverbank remediation proposed to address PCBs. In the event that GE proposes to achieve recreational remediation standards based on the assumption that an AUL will be obtained, the non-PCB data will be evaluated using the procedures that have been used by GE and approved by MDEP for recreational areas at other sites subject to the Administrative Consent Order (ACO) executed by GE and MDEP in November 2000 – e.g., those described in GE's *Phase III Remedial Action Plan for Dalton Avenue Site* (May 2005), as revised in the *Second Addendum to Phase III Remedial Action Plan for Dalton Avenue Site* (May 2006), with the further modification specified by MDEP in an October 10, 2006 letter to GE.

In the event that GE proposes to achieve the Method 1 soil standard for PCBs, the non-PCB riverbank data will be evaluated using the procedures that have been agreed upon by MDEP and GE for evaluating such data at residential properties subject to the ACO. Those procedures include an initial screening step, in which the maximum detected concentrations of polycyclic aromatic hydrocarbons (PAHs) and metals are compared to MDEP's published background levels of those constituents in natural soil (and sulfide levels are compared to background sulfide levels using MDEP's summary statistics approach). For the constituents retained after that screening, the average concentrations are compared to: (a) the MCP Method 1 S-1 soil standards; or (b) for dioxins/furan toxicity equivalency quotients (TEQs), the MDEP's risk-based concentration (RBC) of 5.0E-05 ppm for TEQs at residential properties; or (c) for constituents for which there are no Method 1 standards, either Method 2 standards derived in accordance with the MCP or, under certain conditions, the EPA Region 9 Preliminary Remediation Goals (PRGs) for residential soils.

The non-PCB sampling results, data validation report, and evaluation of the data will be provided to MDEP in the forthcoming RAWP, which is further described below.

E. Schedule for Future Activities

Condition No. 6 of MDEP's conditional approval letter for the Second Supplemental Report requires GE to submit a RAWP within 60 days of MDEP's approval of this Addendum to the Second Supplemental Report. However, GE believes that it will not be feasible to meet this schedule due to:

- The need to obtain PCC approval as well as access permission from the City for the proposed sampling;
- The time necessary to receive the Appendix IX+3 data from the laboratory, validate those data, and evaluate their implications for the remedial action; and
- The time that will be needed to develop a detailed remedial design, including measures to address applicable federal, state, and local permit and approval requirements for work in a waterbody, as well as an assessment of river hydraulics, geotechnical considerations and excavation stability/shoring needs, sediment and soil removal techniques, etc. (some of which may require field activities).

Accordingly, GE proposes to submit the RAWP within 90 days after receipt of the latest of (a) MDEP approval of this Addendum, (b) PCC approval for the proposed additional sampling, and (c) access permission to collect those samples.

In addition to the contents identified in Section 4 of the Second Supplemental Report, the RAWP will include the following information requested by MDEP in its Condition No. 6:

- A contingency plan describing the steps that will be taken in the event that non-aqueous-phase liquid is encountered during soil and sediment removal activities; and
- Design specifications for rip-rap or other engineering controls to be used in the areas of riverbank excavation to stabilize the bank and toe of the slope and prevent erosion, as well as a demonstration that the use of rip-rap or other engineering controls will not result in any significant net loss of flood storage capacity, will not reduce the water-carrying capacity of the river channel, and will comply with all applicable requirements under 310 CMR 10.00.

Please call me if you have any questions regarding this submittal.

Very truly yours,

Richard Gates/EGB

Richard W. Gates
Remediation Project Manager

Attachments

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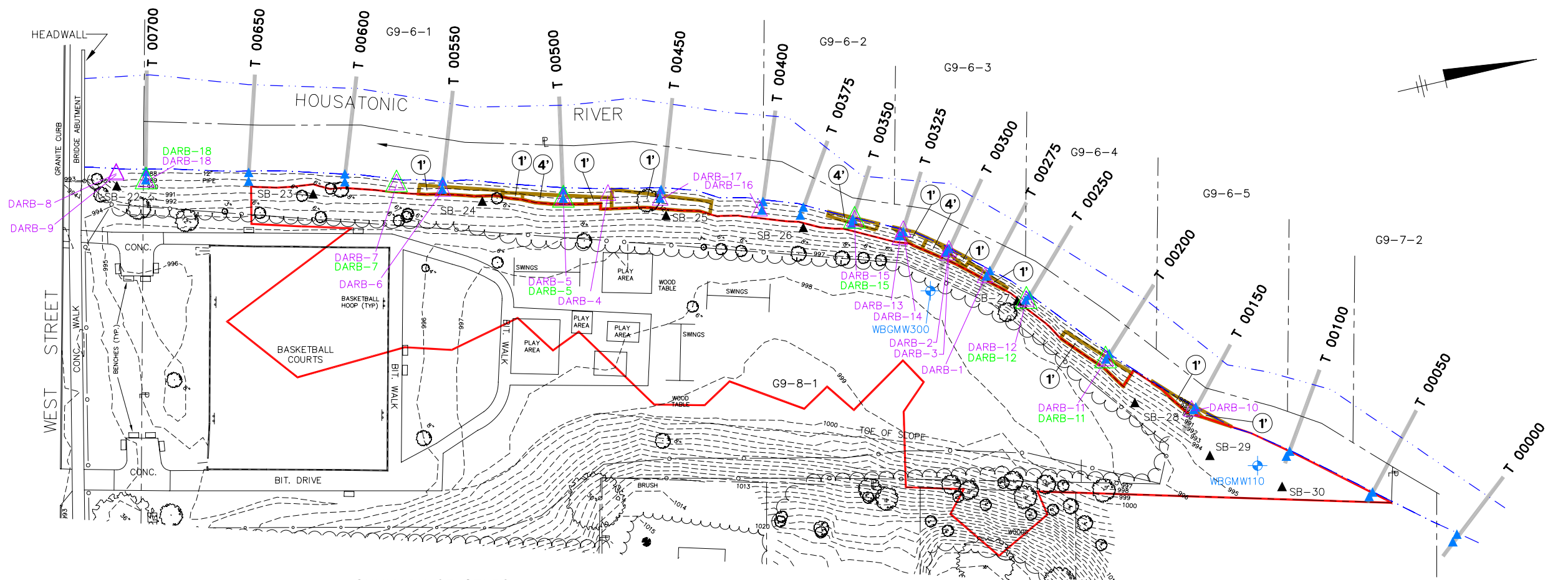
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Public Information Repositories
GE Internal Repositories

* cover letter only

Figures

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 PROJECTNAME: IMAGES: 20685X02 20685X00

- LEGEND:**
- ▲ PRIOR GE SOIL BORING LOCATION
 - ▲ MDEP BANK SOIL SAMPLE LOCATION (2000)
 - ▲ MDEP MONITORING WELL LOCATION
 - ▲ GE BANK SAMPLE LOCATION
 - ▲ PROPOSED APPENDIX IX+3 SOIL SAMPLE LOCATION
 - UTILITY POLE
 - CHAIN LINK FENCE
 - PROPERTY LINE
 - EDGE OF BRUSH
 - DECIDUOUS TREE
 - HORIZONTAL LIMITS OF REMEDIATION PERFORMED BY GE IN 1998 IN VICINITY OF RIVERBANK (REMOVAL DEPTH VARIES)
 - T 00050 MDEP TRANSECT AND ID
 - ▲ AREA PROPOSED FOR PCB SOIL REMOVAL
 - 4' REMOVAL DEPTH



SUMMARY OF MDEP RIVERBANK SOIL BORING PCB SAMPLE RESULTS

(PPM, DRY WT.)
(SAMPLE INCREMENTS IN FEET)

Sample ID	Depth	Total PCBs	Sample ID	Depth	Total PCBs	Sample ID	Depth	Total PCBs
WB00000L1	0-0.5	ND(0.09)	WB00275L1	0-0.5	64	WB00450L1	0-0.5	40
WB00000L2	0.5-1	ND(0.08)	WB00275L2	0.5-1	25	WB00450L2	0.5-1	200
WB00000L3	1-3	ND(0.06)	WB00275L3	1-3	40	WB00450L3	1-3	8.6 J [4 J]
WB00000LB1	0-0.5	ND(0.11)	WB00275LB1	0-0.5	4	WB00450LB1	0-0.5	6
WB00000LB2	0.5-1	ND(0.08)	WB00275LB2	0.5-1	ND(1.4)	WB00450LB2	0.5-1	ND(1.3)
WB00000LB3	1-3	ND(0.06) [ND(0.06)]	WB00275LB3	1-3	ND(0.06)	WB00450LB3	1-3	ND(1.7) [ND(1.6)]
WB00050L1	0-0.5	ND(0.07)	WB00300L1	0-0.5	3,500	WB00500L1	0-0.5	13
WB00050L2	0.5-1	ND(0.07)	WB00300L2	0-0.5	8,900 J*	WB00500L2	0.5-1	330
WB00050L3	1-2.5	ND(0.06)	WB00300L3	0.5-1	4,500 J*	WB00500L3	1-3	35
WB00050LB1	0-0.5	ND(0.1)	WB00300L4	1-3	2,500 J*	WB00500LB1	0-0.5	19
WB00050LB2	0.5-1	ND(0.14)	WB00300L5	0-0.5	290	WB00500LB2	0.5-1	6.1
WB00050LB3	1-3	ND(0.07)	WB00300L6	0.5-1	110	WB00500LB3	1-3	ND(1.7)
WB00100L1	0-0.5	0.3	WB00300L7	1-3	79	WB00500L4	0-0.5	47
WB00100L2	0.5-1	0.3	WB00300L8	0-0.5	34	WB00500L5	0.5-1	89
WB00100L3	1-3	ND(0.05)	WB00325L1	0.5-1	1.1	WB00500L6	1-3	30
WB00100LB1	0-0.5	0.2	WB00325L2	1-3	2.4	WB00500L7	0-0.5	8.7
WB00100LB2	0.5-1	ND(0.08)	WB00325L3	0-0.5	160	WB00500L8	0.5-1	4
WB00100LB3	1-2.5	ND(0.06)	WB00325LB1	0.5-1	27	WB00500L9	1-3	1.3
WB00150L1	0-0.5	2.8	WB00325LB2	1-3	3.3	WB00600L1	0-0.5	6.4
WB00150L2	0.5-1	58	WB00350L1	0-0.5	10	WB00600L2	0.5-1	3.8
WB00150L3	1-3	4.8	WB00350L2	0.5-1	6.7	WB00600L3	1-3	ND(0.07)
WB00150LB1	0-0.5	65	WB00350L3	1-3	1.9	WB00600LB1	0-0.5	0.9
WB00150LB2	0.5-1	0.6	WB00350LB1	0-0.5	38	WB00600LB2	0.5-1	ND(0.6)
WB00150LB3	1-3	0.8	WB00350LB2	0.5-1	80	WB00600LB3	1-3	ND(0.71)
WB00200L1	0-0.5	2.7	WB00350LB3	1-3	3.8	WB00650L1	0-0.5	2.7
WB00200L2	0.5-1	53	WB00375L1	0-0.5	18	WB00650L2	0.5-1	1
WB00200L3	1-3	6.7 J	WB00375L2	0.5-1	0.4	WB00650L3	1-3	0.6
WB00200LB1	0-0.5	0.9	WB00375L3	1-3	1.2 [0.2]	WB00650LB1	0-0.5	0.7
WB00200LB2	0.5-1	ND(0.11)	WB00375LB1	0-0.5	19	WB00650LB2	0.5-1	1
WB00200LB3	1-3	ND(0.1)	WB00375LB2	0.5-1	9.9	WB00650LB3	1-3	ND(0.82)
WB00250L1	0-0.5	6.3	WB00375LB3	1-3	ND(1.8)	WB00700L1	0-0.5	13
WB00250L2	0.5-1	15	WB00400L1	0-0.5	40	WB00700L2	0.5-1	3.5
WB00250L3	1-3	4.7	WB00400L2	0.5-1	20	WB00700L3	1-3	4.9
WB00250LB1	0-0.5	4 [6.4]	WB00400L3	1-3	18	WB00700LB1	0-0.5	1.4
WB00250LB2	0.5-1	0.08	WB00400LB1	0-2	8.4	WB00700LB2	0.5-1	ND(0.07)
WB00250LB3	1-3	0.09	WB00400LB2	2-3	ND(1.8)	WB00700LB3	1-3	ND(0.08) [ND(0.08)]

- NOTES:**
- Samples were collected by Green Environmental and submitted for analysis of PCBs.
 - The sample ID numbers on this table contain numbers corresponding to the MDEP transects shown on this figure, followed by the letters LT or LB (designating the left top, left bottom of bank, respectively, looking downstream) and then a number indicating depth (with 1 indicating the uppermost sample, 2 indicating the mid-level sample, and 3 indicating the deepest sample collected).

SUMMARY OF SELECT GE SOIL BORING PCB SAMPLE RESULTS (1997)

(PPM, DRY WT.)
(SAMPLE INCREMENTS IN FEET)

Sample ID	Depth	Total PCBs
G9-8-1-SB-22	0-0.5	0.95
	0.5-1	1.6
	1-2	1.3
	2-4	3.5 [2.0]
G9-8-1-SB-23	0-0.5	3.5
	0.5-1	1.3
	1-2	2.2
	2-4	0.15
G9-8-1-SB-24	0-0.5	---
	0.5-1	---
	1-2	20
	2-4	1.6
G9-8-1-SB-25	0-0.5	3.8
	0.5-1	0.18
	1-2	0.11
	2-4	0.13
G9-8-1-SB-26	0-0.5	---
	0.5-1	---
	1-2	1.1
	2-4	0.22
G9-8-1-SB-27	0-0.5	160
	0.5-1	160
	1-2	0.98
	2-4	0.19
G9-8-1-SB-28	0-0.5	---
	0.5-1	---
	1-2	62
	2-4	0.27
G9-8-1-SB-29	0-0.5	18
	0.5-1	34
	1-2	210
	2-4	420
	4-6	0.18
G9-8-1-SB-30	0-0.5	430
	0.5-1	422
	1-2	186
	2-4	46.7
	4-6	0.2 [0.92]

- NOTES:**
- Samples were collected by Blasland, Bouck & Lee, Inc. and were submitted to Columbia Analytical Services for analysis of PCBs.
 - Shaded numbers represent samples addressed during remedial activities performed by GE in 1998.

SUMMARY OF GE RIVERBANK SOIL BORING PCB SAMPLE RESULTS (2005)

(PPM, DRY WT.)
(SAMPLE INCREMENTS IN FEET)

Sample ID	Depth	Total PCBs
DARB-1	3-4	0.77
DARB-2	3-4	220
	4-6	11
DARB-3	3-4	0.35 J
DARB-4	1-3	0.303
DARB-5	3-4	230
	4-6	2.3
	6-8	ND [0.058]
DARB-6	3-4	1.3
DARB-7	0-1	3.6 J
	1-3	12 J [43 J]
	3-4	0.67
DARB-8	0-1	2.0 [1.6]
	1-3	0.209
	3-4	0.70
DARB-9	0-1	1.8
	1-3	2.02
	3-4	6.3
	4-6	0.11
DARB-10	3-4	0.43
DARB-11	3-4	0.249
DARB-12	3-4	0.018 J
DARB-13	3-4	0.13
DARB-14	3-4	0.64 [0.57]
DARB-15	3-4	790
	4-6	0.14
DARB-16	3-4	0.35
DARB-17	3-4	1.9
DARB-18	3-4	1.45 J

- NOTE:**
- Samples were collected by Blasland, Bouck & Lee, Inc. and were submitted to SGS Environmental Services, Inc. for analysis of PCBs.

- GENERAL NOTES FOR TABLES:**
- Duplicate results are presented in brackets [].
 - = No sample collected.
 - J - Indicates an estimated value less than the practical quantitation limit (PQL).
 - J* - Indicates the surrogate recoveries are equal to zero.
 - ND - Analyte was not detected. The value in parenthesis is the associated detection limit.

- NOTES:**
- BASE MAP PREPARED BASED ON SURVEY INFORMATION (8/15/97 AND 9/18, 22/97) BY HILL ENGINEERS, ARCHITECTS AND PLANNERS.
 - ALL EXISTING GE SAMPLING, BORING, AND MONITORING WELL LOCATIONS WERE SURVEYED BY BBL, INC.
 - ONLY THOSE EXISTING SAMPLE LOCATIONS LOCATED IN VICINITY OF RIVER/RIVERBANK AREA ARE SHOWN ON THIS FIGURE.
 - MDEP SAMPLES ON THE RIGHT BANK (LOOKING DOWNSTREAM) HAD PCB CONCENTRATIONS OF 1.4 PPM OR LESS. THEREFORE NO FURTHER DELINEATION WAS REQUIRED AND THE SAMPLES HAVE NOT BEEN SHOWN ON THIS FIGURE.



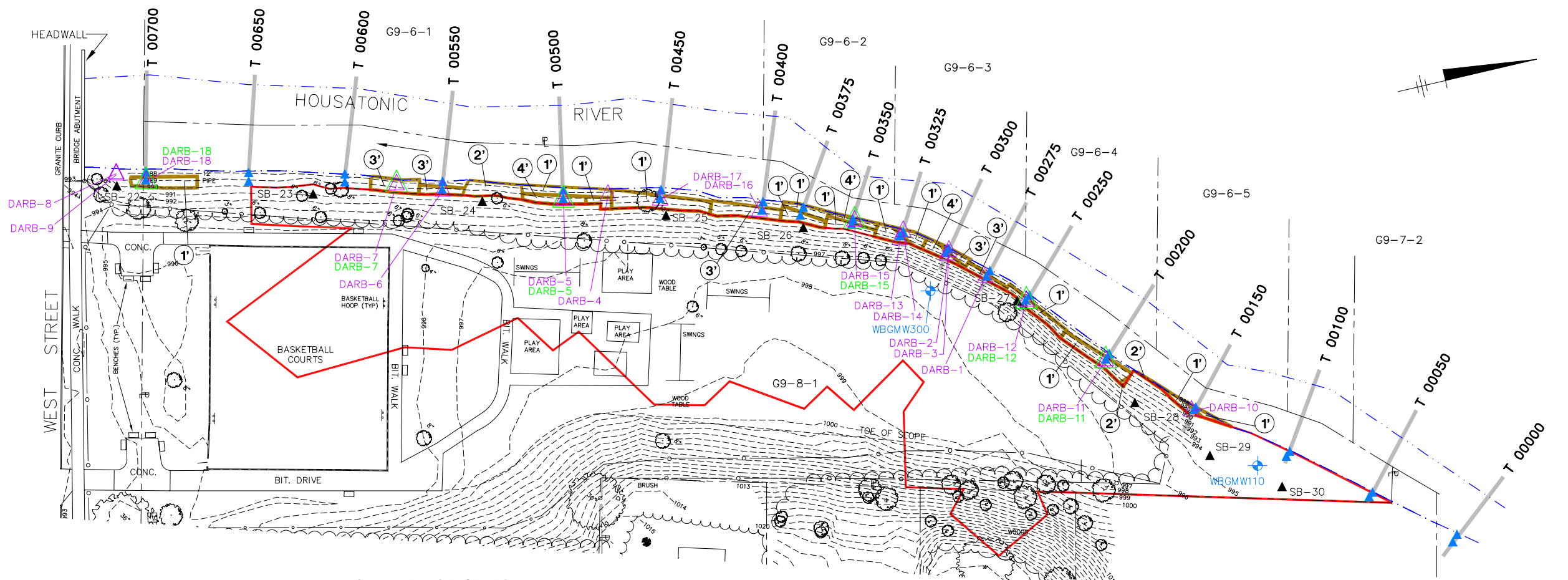
GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
WEST BRANCH OF HOUSATONIC RIVER
ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING
SUMMARY REPORT
RIVERBANK SOIL SAMPLE LOCATIONS
AND PRELIMINARY REMOVAL LIMITS TO
ACHIEVE RECREATIONAL STANDARDS


 an ARCADIS company

FIGURE
1

SYR-85-DNW-LAF-LAYER-ON-*.OFF=REF*
 G:\VE_ACTIVE\N\20685001\SSSR\ADDENDUM\REPORT_20685010.DWG
 PENTABLE.PLT/PLTCTB PRINTED:10/27/2006 10:56 AM BY:FLORAKER
 LAYOUT:Layout1 PAGESETUP:DL2B-PDF
 G:\VE_ACTIVE\N\20685001\SSSR\ADDENDUM\REPORT_20685010.DWG
 PENTABLE.PLT/PLTCTB PRINTED:10/27/2006 10:56 AM BY:FLORAKER
 LAYOUT:Layout1 PAGESETUP:DL2B-PDF

- LEGEND:**
- ▲ PRIOR GE SOIL BORING LOCATION
 - ▲ MDEP BANK SOIL SAMPLE LOCATION (2000)
 - ▲ MDEP MONITORING WELL LOCATION
 - ▲ GE BANK SAMPLE LOCATION
 - ▲ PROPOSED APPENDIX IX+3 SOIL SAMPLE LOCATION
 - UTILITY POLE
 - CHAIN LINK FENCE
 - PROPERTY LINE
 - EDGE OF BRUSH
 - DECIDUOUS TREE
 - HORIZONTAL LIMITS OF REMEDIATION PERFORMED BY GE IN 1998 IN VICINITY OF RIVERBANK (REMOVAL DEPTH VARIES)
 - T 00050 MDEP TRANSECT AND ID
 - ▲ AREA PROPOSED FOR PCB SOIL REMOVAL
 - ④' REMOVAL DEPTH



SUMMARY OF MDEP RIVERBANK SOIL BORING PCB SAMPLE RESULTS

(PPM, DRY WT.)
(SAMPLE INCREMENTS IN FEET)

Sample ID	Depth	Total PCBs	Sample ID	Depth	Total PCBs	Sample ID	Depth	Total PCBs
WB00000L1	0-0.5	ND(0.09)	WB00275L1	0-0.5	64	WB00450L1	0-0.5	40
WB00000L2	0.5-1	ND(0.08)	WB00275L2	0.5-1	25	WB00450L2	0.5-1	200
WB00000L3	1-3	ND(0.06)	WB00275L3	1-3	40	WB00450L3	1-3	8.6 J [4 J]
WB00000LB1	0-0.5	ND(0.11)	WB00275LB1	0-0.5	4	WB00450LB1	0-0.5	6
WB00000LB2	0.5-1	ND(0.08)	WB00275LB2	0.5-1	ND(1.4)	WB00450LB2	0.5-1	ND(1.3)
WB00000LB3	1-3	ND(0.06) [ND(0.06)]	WB00275LB3	1-3	ND(0.06)	WB00450LB3	1-3	ND(1.7) [ND(1.6)]
WB00050L1	0-0.5	ND(0.07)	WB00300L1	0-0.5	3,500	WB00500L1	0-0.5	13
WB00050L2	0.5-1	ND(0.07)	WB00300L2	0-0.5	8,900 J*	WB00500L2	0.5-1	330
WB00050L3	1-2.5	ND(0.06)	WB00300L3	0.5-1	4,500 J*	WB00500L3	1-3	35
WB00050LB1	0-0.5	ND(0.1)	WB00300LB1	1-3	2,500 J*	WB00500LB1	0-0.5	19
WB00050LB2	0.5-1	ND(0.14)	WB00300LB2	0-0.5	290	WB00500LB2	0.5-1	6.1
WB00050LB3	1-3	ND(0.07)	WB00300LB3	0.5-1	110	WB00500LB3	1-3	ND(1.7)
WB00100L1	0-0.5	0.3	WB00325L1	1-3	79	WB00550L1	0-0.5	47
WB00100L2	0.5-1	0.3	WB00325L2	0-0.5	34	WB00550L2	0.5-1	89
WB00100L3	1-3	ND(0.05)	WB00325L3	0.5-1	1.1	WB00550L3	1-3	30
WB00100LB1	0-0.5	0.2	WB00325LB1	1-3	2.4	WB00550LB1	0-0.5	8.7
WB00100LB2	0.5-1	ND(0.08)	WB00325LB2	0-0.5	160	WB00550LB2	0.5-1	4
WB00100LB3	1-2.5	ND(0.06)	WB00325LB3	0.5-1	27	WB00550LB3	1-3	1.3
WB00150L1	0-0.5	2.8	WB00350L1	1-3	3.3	WB00600L1	0-0.5	6.4
WB00150L2	0.5-1	58	WB00350L2	0-0.5	10	WB00600L2	0.5-1	3.8
WB00150L3	1-3	4.8	WB00350L3	0.5-1	6.7	WB00600L3	1-3	ND(0.07)
WB00150LB1	0-0.5	65	WB00350LB1	1-3	1.9	WB00600LB1	0-0.5	0.9
WB00150LB2	0.5-1	0.6	WB00350LB2	0-0.5	38	WB00600LB2	0.5-1	ND(0.6)
WB00150LB3	1-3	0.8	WB00350LB3	0.5-1	80	WB00600LB3	1-3	ND(0.71)
WB00200L1	0-0.5	2.7	WB00375L1	1-3	3.8	WB00650L1	0-0.5	2.7
WB00200L2	0.5-1	53	WB00375L2	0-0.5	18	WB00650L2	0.5-1	1
WB00200L3	1-3	6.7 J	WB00375L3	0.5-1	0.4	WB00650L3	1-3	0.6
WB00200LB1	0-0.5	0.9	WB00375LB1	1-3	1.2 [0.2]	WB00650LB1	0-0.5	0.7
WB00200LB2	0.5-1	ND(0.11)	WB00375LB2	0-0.5	19	WB00650LB2	0.5-1	1
WB00200LB3	1-3	ND(0.1)	WB00375LB3	0.5-1	9.9	WB00650LB3	1-3	ND(0.82)
WB00250L1	0-0.5	6.3	WB00400L1	1-3	ND(1.8)	WB00700L1	0-0.5	13
WB00250L2	0.5-1	15	WB00400L2	0-0.5	40	WB00700L2	0.5-1	3.5
WB00250L3	1-3	4.7	WB00400L3	0.5-1	20	WB00700L3	1-3	4.9
WB00250LB1	0-0.5	4 [6.4]	WB00400LB1	1-3	18	WB00700LB1	0-0.5	1.4
WB00250LB2	0.5-1	0.08	WB00400LB2	0-0.5	8.4	WB00700LB2	0.5-1	ND(0.07)
WB00250LB3	1-3	0.09	WB00400LB3	2-3	ND(1.8)	WB00700LB3	1-3	ND(0.08) [ND(0.08)]

- NOTES:**
- Samples were collected by Green Environmental and submitted for analysis of PCBs.
 - The sample ID numbers on this table contain numbers corresponding to the MDEP transects shown on this figure, followed by the letters LT or LB (designating the left top, left bottom of bank, respectively, looking downstream) and then a number indicating depth (with 1 indicating the uppermost sample, 2 indicating the mid-level sample, and 3 indicating the deepest sample collected).

SUMMARY OF SELECT GE SOIL BORING PCB SAMPLE RESULTS (1997)

(PPM, DRY WT.)
(SAMPLE INCREMENTS IN FEET)

Sample ID	Depth	Total PCBs
G9-8-1-SB-22	0-0.5	0.95
	0.5-1	1.6
	1-2	1.3
	2-4	3.5 [2.0]
G9-8-1-SB-23	0-0.5	3.5
	0.5-1	1.3
	1-2	2.2
	2-4	0.15
G9-8-1-SB-24	0-0.5	---
	0.5-1	---
	1-2	20
	2-4	1.6
G9-8-1-SB-25	0-0.5	3.8
	0.5-1	0.18
	1-2	0.11
	2-4	0.13
G9-8-1-SB-26	0-0.5	---
	0.5-1	---
	1-2	1.1
	2-4	0.22
G9-8-1-SB-27	0-0.5	160
	0.5-1	160
	1-2	0.98
	2-4	0.19
G9-8-1-SB-28	0-0.5	---
	0.5-1	---
	1-2	62
	2-4	0.27
G9-8-1-SB-29	0-0.5	18
	0.5-1	34
	1-2	210
	2-4	420
	4-6	0.18
G9-8-1-SB-30	0-0.5	430
	0.5-1	422
	1-2	186
	2-4	46.7
	4-6	0.2 [0.92]

- NOTES:**
- Samples were collected by Blasland, Bouck & Lee, Inc. and were submitted to Columbia Analytical Services for analysis of PCBs.
 - Shaded numbers represent samples addressed during remedial activities performed by GE in 1998.

SUMMARY OF GE RIVERBANK SOIL BORING PCB SAMPLE RESULTS (2005)

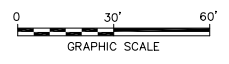
(PPM, DRY WT.)
(SAMPLE INCREMENTS IN FEET)

Sample ID	Depth	Total PCBs
DARB-1	3-4	0.77
DARB-2	3-4	220
	4-6	11
DARB-3	3-4	0.35 J
DARB-4	1-3	0.303
DARB-5	3-4	230
	4-6	2.3
	6-8	ND [0.058]
DARB-6	3-4	1.3
DARB-7	0-1	3.6 J
	1-3	12 J [43 J]
	3-4	0.67
DARB-8	0-1	2.0 [1.6]
	1-3	0.209
	3-4	0.70
DARB-9	0-1	1.8
	1-3	2.02
	3-4	6.3
	4-6	0.11
DARB-10	3-4	0.43
DARB-11	3-4	0.249
DARB-12	3-4	0.018 J
DARB-13	3-4	0.13
DARB-14	3-4	0.64 [0.57]
DARB-15	3-4	790
	4-6	0.14
DARB-16	3-4	0.35
DARB-17	3-4	1.9
DARB-18	3-4	1.45 J

- NOTE:**
- Samples were collected by Blasland, Bouck & Lee, Inc. and were submitted to SGS Environmental Services, Inc. for analysis of PCBs.

- GENERAL NOTES FOR TABLES:**
- Duplicate results are presented in brackets [].
 - = No sample collected.
 - J - Indicates an estimated value less than the practical quantitation limit (PQL).
 - J* - Indicates the surrogate recoveries are equal to zero.
 - ND - Analyte was not detected. The value in parenthesis is the associated detection limit.

- NOTES:**
- BASE MAP PREPARED BASED ON SURVEY INFORMATION (8/15/97 AND 9/18, 22/97) BY HILL ENGINEERS, ARCHITECTS AND PLANNERS.
 - ALL EXISTING GE SAMPLING, BORING, AND MONITORING WELL LOCATIONS WERE SURVEYED BY BBL, INC.
 - ONLY THOSE EXISTING SAMPLE LOCATIONS LOCATED IN VICINITY OF RIVER/RIVERBANK AREA ARE SHOWN ON THIS FIGURE.
 - MDEP SAMPLES ON THE RIGHT BANK (LOOKING DOWNSTREAM) HAD PCB CONCENTRATIONS OF 1.4 PPM OR LESS. THEREFORE NO FURTHER DELINEATION WAS REQUIRED AND THE SAMPLES HAVE NOT BEEN SHOWN ON THIS FIGURE.

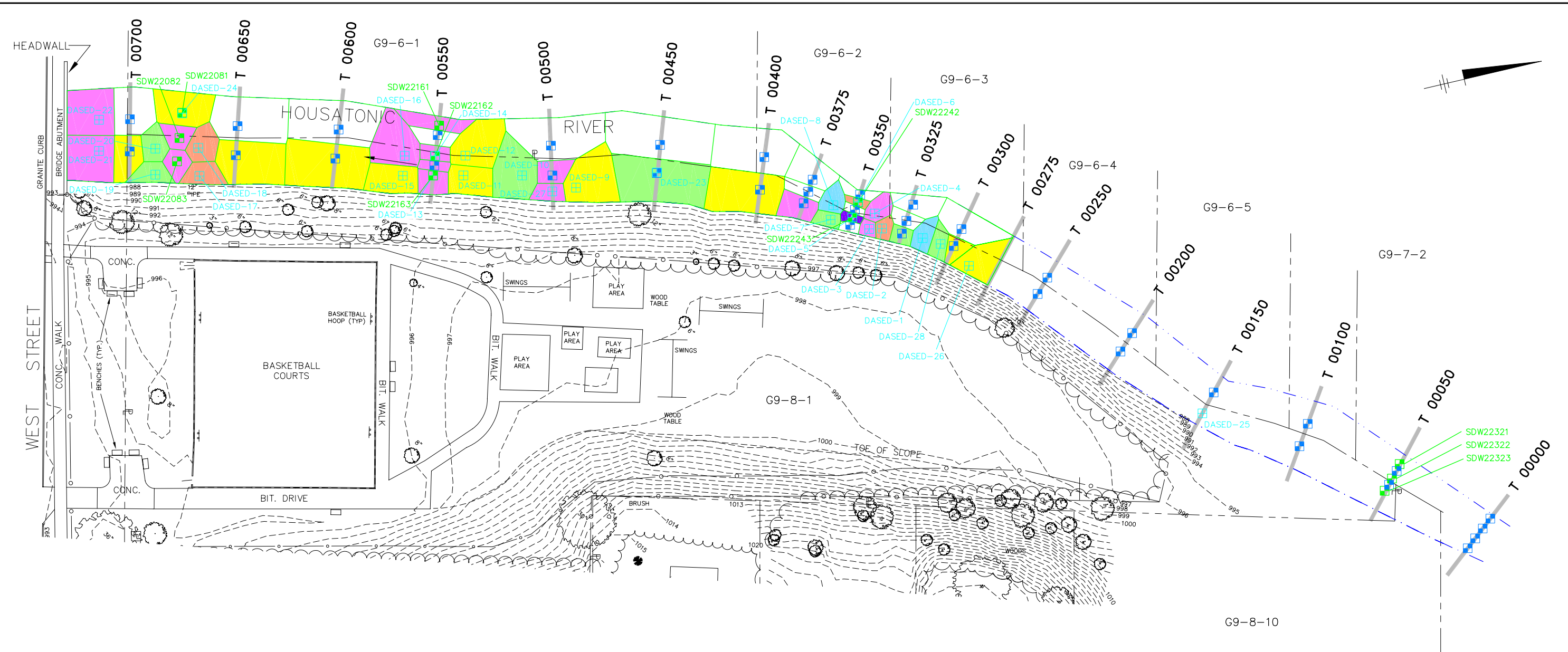


GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
WEST BRANCH OF HOUSATONIC RIVER
ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING
SUMMARY REPORT
RIVERBANK SOIL SAMPLE LOCATIONS
AND PRELIMINARY REMOVAL LIMITS TO
ACHIEVE METHOD 1 SOIL STANDARDS

an ARCADIS company

FIGURE
2

S:\P-85-DWM-KLS-LAF-LAYER_ON*.OFF-REF*
 G:\VE_ACTIVE\N\20685001\SSSR\ADDENDUM\REPORT\20685004.DWG
 PROJECT NAME: 20685X02
 20685X00
 PENTABLE.PLT, FULL CTB PRINTED: 10/27/2006 10:54 AM BY: LFORAKER
 LAYOUT: 3 PAGESETUP: DL2B-PDF
 PAGES: 3
 SAVED: 10/27/2006 10:54 AM



NOTES:

1. BASE MAP PREPARED BASED ON SURVEY INFORMATION (8/15/97 AND 9/18, 22/97) BY HILL ENGINEERS, ARCHITECTS AND PLANNERS.
2. ALL EXISTING GE SAMPLING LOCATIONS WERE SURVEYED BY BBL, INC.
3. ONLY THOSE EXISTING SAMPLE LOCATIONS LOCATED WITHIN THE RIVER ARE SHOWN ON THIS FIGURE.
4. MDEP SAMPLE LOCATION IDs CONSIST OF THE MDEP TRANSECTS SHOWN ON THIS FIGURE, FOLLOWED BY THE LETTERS LT OR LB (DESIGNATING THE LEFT TOP, LEFT BOTTOM OF BANK, RESPECTIVELY, LOOKING DOWNSTREAM).

- EPA SEDIMENT SAMPLE LOCATION (1999)
- MDEP SEDIMENT SAMPLE LOCATION (2000)
- GE SEDIMENT SAMPLE LOCATION (2005)
- CHAIN LINK FENCE
- |— PROPERTY LINE
- ~ EDGE OF BRUSH
- DECIDUOUS TREE

LEGEND:

- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH.
- 1-FOOT REMOVAL
- 2-FOOT REMOVAL
- 3-FOOT REMOVAL
- 4-FOOT REMOVAL
- 5-FOOT REMOVAL
- 6-FOOT REMOVAL

— T 00050 MDEP TRANSECT AND ID

GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
WEST BRANCH OF HOUSATONIC RIVER
 ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING
 SUMMARY REPORT

PROPOSED SEDIMENT
 REMOVAL LIMITS

FIGURE

3

Attachments

Attachment A

Riverbank PCB Spatial Averaging Evaluation Tables and Theissen Polygon Figures – Comparison to Recreational Standards

TABLE A-1
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 1-FOOT DEPTH INCREMENT (EXISTING CONDITIONS) - FOR COMPARISON TO RECREATIONAL STANDARDS

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

0- TO 0.5-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-7	1	165	0 - 0.5	3.6	3.06	3.60	11.00
DARB-8	2	78	0 - 0.5	1.8	1.45	1.80	2.61
DARB-9	3	64	0 - 0.5	1.8	1.19	1.80	2.14
SB-22	4	22	0 - 0.5	0.95	0.40	0.95	0.38
WB00050LB	5	12	0 - 0.5	0.05	0.23	0.05	0.01
WB00050LT	6	7	0 - 0.5	0.035	0.12	0.04	0.00
WB00100LB	7	15	0 - 0.5	0.2	0.28	0.20	0.06
WB00100LT	8	1	0 - 0.5	0.3	0.01	0.30	0.00
WB00150LB	9	37	0 - 0.5	65	0.68	65.00	43.96
WB00150LT	10	62	0 - 0.5	2.8	1.16	2.80	3.24
WB00200LB	11	119	0 - 0.5	0.9	2.20	0.90	1.98
WB00200LT	12	213	0 - 0.5	2.7	3.94	2.70	10.65
WB00250LB	13	99	0 - 0.5	5.2	1.83	5.20	9.49
WB00250LT	14	144	0 - 0.5	6.3	2.66	6.30	16.76
WB00275LB	15	63	0 - 0.5	4	1.17	4.00	4.69
WB00275LT	16	66	0 - 0.5	64	1.22	64.00	78.32
WB00300LB	17	48	0 - 0.5	290	0.89	290.00	257.63
WB00300LT	18	91	0 - 0.5	6,200	1.69	6,200.00	10,454.12
WB00325LB	19	76	0 - 0.5	160	1.40	160.00	224.13
WB00325LT	20	92	0 - 0.5	34	1.71	34.00	58.09
WB00350LB	21	70	0 - 0.5	38	1.30	38.00	49.40
WB00350LT	22	107	0 - 0.5	10	1.98	10.00	19.81
WB00375LB	23	88	0 - 0.5	19	1.63	19.00	30.95
WB00375LT	24	117	0 - 0.5	18	2.16	18.00	38.90
WB00400LB	25	118	0 - 0.5	8.4	2.19	8.40	18.36
WB00400LT	26	214	0 - 0.5	40	3.96	40.00	158.47
WB00450LB	27	159	0 - 0.5	6	2.94	6.00	17.62
WB00450LT	28	347	0 - 0.5	40	6.42	40.00	256.91
WB00500LB	29	229	0 - 0.5	19	4.25	19.00	80.72
WB00500LT	30	215	0 - 0.5	13	3.98	13.00	51.72
WB00550LB	31	143	0 - 0.5	8.7	2.65	8.70	23.07
WB00550LT	32	153	0 - 0.5	47	2.83	47.00	133.08
WB00600LB	33	108	0 - 0.5	0.9	2.00	0.90	1.80
WB00600LT	34	149	0 - 0.5	6.4	2.76	6.40	17.69
WB00650LB	35	183	0 - 0.5	0.7	3.39	0.70	2.37
WB00650LT	36	215	0 - 0.5	2.7	3.97	2.70	10.73
WB00700LB	37	125	0 - 0.5	1.4	2.32	1.40	3.25
WB00700LT	38	174	0 - 0.5	13	3.23	13.00	41.98
Totals:	--	4,387	--	--	81.24	--	12,136.10
Volume Weighted Average:							149.38

TABLE A-1
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 1-FOOT DEPTH INCREMENT (EXISTING CONDITIONS) - FOR COMPARISON TO RECREATIONAL STANDARDS

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

0.5- TO 1-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-7	1	165	0.5 - 1	3.6	3.06	3.60	11.00
DARB-8	2	78	0.5 - 1	1.8	1.45	1.80	2.61
DARB-9	3	64	0.5 - 1	1.8	1.19	1.80	2.14
SB-22	4	22	0.5 - 1	1.6	0.40	1.60	0.64
WB00050LB	5	12	0.5 - 1	0.07	0.23	0.07	0.02
WB00050LT	6	7	0.5 - 1	0.035	0.12	0.04	0.00
WB00100LB	7	15	0.5 - 1	0.04	0.28	0.04	0.01
WB00100LT	8	1	0.5 - 1	0.3	0.01	0.30	0.00
WB00150LB	9	37	0.5 - 1	0.6	0.68	0.60	0.41
WB00150LT	10	62	0.5 - 1	58	1.16	58.00	67.03
WB00200LB	11	119	0.5 - 1	0.055	2.20	0.06	0.12
WB00200LT	12	213	0.5 - 1	53	3.94	53.00	209.07
WB00250LB	13	99	0.5 - 1	0.08	1.83	0.08	0.15
WB00250LT	14	144	0.5 - 1	15	2.66	15.00	39.90
WB00275LB	15	63	0.5 - 1	0.7	1.17	0.70	0.82
WB00275LT	16	66	0.5 - 1	25	1.22	25.00	30.59
WB00300LB	17	48	0.5 - 1	110	0.89	110.00	97.72
WB00300LT	18	91	0.5 - 1	4,500	1.69	4,500.00	7,587.67
WB00325LB	19	76	0.5 - 1	27	1.40	27.00	37.82
WB00325LT	20	92	0.5 - 1	1.1	1.71	1.10	1.88
WB00350LB	21	70	0.5 - 1	80	1.30	80.00	104.00
WB00350LT	22	107	0.5 - 1	6.7	1.98	6.70	13.27
WB00375LB	23	88	0.5 - 1	9.9	1.63	9.90	16.12
WB00375LT	24	117	0.5 - 1	0.4	2.16	0.40	0.86
WB00400LB	25	118	0.5 - 1	8.4	2.19	8.40	18.36
WB00400LT	26	214	0.5 - 1	20	3.96	20.00	79.23
WB00450LB	27	159	0.5 - 1	0.65	2.94	0.65	1.91
WB00450LT	28	347	0.5 - 1	200	6.42	200.00	1,284.56
WB00500LB	29	229	0.5 - 1	6.1	4.25	6.10	25.91
WB00500LT	30	215	0.5 - 1	330	3.98	330.00	1,312.93
WB00550LB	31	143	0.5 - 1	4	2.65	4.00	10.61
WB00550LT	32	153	0.5 - 1	89	2.83	89.00	252.01
WB00600LB	33	108	0.5 - 1	0.3	2.00	0.30	0.60
WB00600LT	34	149	0.5 - 1	3.8	2.76	3.80	10.50
WB00650LB	35	183	0.5 - 1	1	3.39	1.00	3.39
WB00650LT	36	215	0.5 - 1	1	3.97	1.00	3.97
WB00700LB	37	125	0.5 - 1	0.035	2.32	0.04	0.08
WB00700LT	38	174	0.5 - 1	3.5	3.23	3.50	11.30
Totals:	--	4,387	--	--	81.24	--	11,239.24
Volume Weighted Average:						138.34	

**TABLE A-1
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 1-FOOT DEPTH INCREMENT (EXISTING CONDITIONS) - FOR COMPARISON TO RECREATIONAL STANDARDS**

**ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

SUMMARY - 0- TO 1-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	4,387	--	--	162.49	--	23,375.34
Volume Weighted Average:							143.86

Notes:

1. Polygon ID and area are based on information shown on Figure A-1.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.

TABLE A-2
DOROTHY AMOS PARK - RIVERBANK SOILS
1- TO 3-FOOT DEPTH INCREMENT (EXISTING CONDITIONS) - FOR COMPARISON TO RECREATIONAL STANDARDS

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

1- TO 2-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-4	1	224	1 - 2	0.3	8.30	0.30	2.49
DARB-7	2	165	1 - 2	27.5	6.11	27.50	168.09
DARB-8	3	78	1 - 2	0.209	2.90	0.21	0.61
DARB-9	4	64	1 - 2	2.02	2.37	2.02	4.80
SB-22	5	22	1 - 2	1.3	0.80	1.30	1.04
SB-23	6	147	1 - 2	2.2	5.46	2.20	12.00
SB-24	7	203	1 - 2	20	7.52	20.00	150.45
SB-25	8	137	1 - 2	0.11	5.08	0.11	0.56
SB-26	9	36	1 - 2	1.1	1.32	1.10	1.46
SB-27	10	47	1 - 2	0.98	1.73	0.98	1.69
SB-28	46, 47	21	1 - 2	62	0.79	62.00	48.84
WB00050LB	12	12	1 - 2	0.035	0.46	0.04	0.02
WB00050LT	13	7	1 - 2	0.03	0.24	0.03	0.01
WB00100LB	14	15	1 - 2	0.03	0.56	0.03	0.02
WB00100LT	15	1	1 - 2	0.025	0.02	0.03	0.00
WB00150LB	16	37	1 - 2	0.8	1.35	0.80	1.08
WB00150LT	17	55	1 - 2	4.8	2.04	4.80	9.79
WB00200LB	18	113	1 - 2	0.05	4.20	0.05	0.21
WB00200LT	19	205	1 - 2	6.7	7.59	6.70	50.83
WB00250LB	20	88	1 - 2	0.09	3.26	0.09	0.29
WB00250LT	21	114	1 - 2	4.7	4.22	4.70	19.86
WB00275LB	22	59	1 - 2	0.03	2.20	0.03	0.07
WB00275LT	23	63	1 - 2	40	2.35	40.00	94.00
WB00300LB	24	48	1 - 2	79	1.78	79.00	140.37
WB00300LT	25	91	1 - 2	2,800	3.37	2,800.00	9,442.43
WB00325LB	26	76	1 - 2	3.3	2.80	3.30	9.25
WB00325LT	27	92	1 - 2	2.4	3.42	2.40	8.20
WB00350LB	28	70	1 - 2	3.8	2.60	3.80	9.88
WB00350LT	29	104	1 - 2	1.9	3.83	1.90	7.28
WB00375LB	30	86	1 - 2	0.9	3.17	0.90	2.85
WB00375LT	31	87	1 - 2	0.7	3.22	0.70	2.25
WB00400LB	32	117	1 - 2	8.4	4.33	8.40	36.35
WB00400LT	33	204	1 - 2	18	7.54	18.00	135.70
WB00450LB	34	125	1 - 2	0.825	4.65	0.83	3.83
WB00450LT	35	144	1 - 2	6.3	5.34	6.30	33.63
WB00500LB	36	131	1 - 2	0.85	4.85	0.85	4.12
WB00500LT	37	131	1 - 2	35	4.85	35.00	169.70
WB00550LB	38	73	1 - 2	1.3	2.72	1.30	3.53
WB00550LT	39	88	1 - 2	30	3.27	30.00	98.24
WB00600LB	40	62	1 - 2	0.355	2.28	0.36	0.81
WB00600LT	41	102	1 - 2	0.035	3.78	0.04	0.13
WB00650LB	42	161	1 - 2	0.41	5.96	0.41	2.44
WB00650LT	43	183	1 - 2	0.6	6.77	0.60	4.06
WB00700LB	44	125	1 - 2	0.04	4.64	0.04	0.19
WB00700LT	45	174	1 - 2	4.9	6.46	4.90	31.65
Totals:	--	4,387	--	--	162.49	--	10,715.10
Volume Weighted Average:						65.94	

TABLE A-2
DOROTHY AMOS PARK - RIVERBANK SOILS
1- TO 3-FOOT DEPTH INCREMENT (EXISTING CONDITIONS) - FOR COMPARISON TO RECREATIONAL STANDARDS

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

2- TO 3-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-4	1	224	2 - 3	0.3	8.30	0.30	2.49
DARB-7	2	165	2 - 3	27.5	6.11	27.50	168.09
DARB-8	3	78	2 - 3	0.209	2.90	0.21	0.61
DARB-9	4	64	2 - 3	2.02	2.37	2.02	4.80
SB-22	5	22	2 - 3	2.75	0.80	2.75	2.20
SB-23	6	147	2 - 3	0.15	5.46	0.15	0.82
SB-24	7	203	2 - 3	1.6	7.52	1.60	12.04
SB-25	8	137	2 - 3	0.13	5.08	0.13	0.66
SB-26	9	36	2 - 3	0.22	1.32	0.22	0.29
SB-27	10	47	2 - 3	0.19	1.73	0.19	0.33
SB-28	46, 47	21	2 - 3	0.27	0.79	0.27	0.21
WB00050LB	12	12	2 - 3	0.035	0.46	0.04	0.02
WB00050LT	13	7	2 - 3	0.03	0.24	0.03	0.01
WB00100LB	14	15	2 - 3	0.03	0.56	0.03	0.02
WB00100LT	15	1	2 - 3	0.025	0.02	0.03	0.00
WB00150LB	16	37	2 - 3	0.8	1.35	0.80	1.08
WB00150LT	17	55	2 - 3	4.8	2.04	4.80	9.79
WB00200LB	18	113	2 - 3	0.05	4.20	0.05	0.21
WB00200LT	19	205	2 - 3	6.7	7.59	6.70	50.83
WB00250LB	20	88	2 - 3	0.09	3.26	0.09	0.29
WB00250LT	21	114	2 - 3	4.7	4.22	4.70	19.86
WB00275LB	22	59	2 - 3	0.03	2.20	0.03	0.07
WB00275LT	23	63	2 - 3	40	2.35	40.00	94.00
WB00300LB	24	48	2 - 3	79	1.78	79.00	140.37
WB00300LT	25	91	2 - 3	2,800	3.37	2,800.00	9,442.43
WB00325LB	26	76	2 - 3	3.3	2.80	3.30	9.25
WB00325LT	27	92	2 - 3	2.4	3.42	2.40	8.20
WB00350LB	28	70	2 - 3	3.8	2.60	3.80	9.88
WB00350LT	29	104	2 - 3	1.9	3.83	1.90	7.28
WB00375LB	30	86	2 - 3	0.9	3.17	0.90	2.85
WB00375LT	31	87	2 - 3	0.7	3.22	0.70	2.25
WB00400LB	32	117	2 - 3	0.9	4.33	0.90	3.90
WB00400LT	33	204	2 - 3	18	7.54	18.00	135.70
WB00450LB	34	125	2 - 3	0.825	4.65	0.83	3.83
WB00450LT	35	144	2 - 3	6.3	5.34	6.30	33.63
WB00500LB	36	131	2 - 3	0.85	4.85	0.85	4.12
WB00500LT	37	131	2 - 3	35	4.85	35.00	169.70
WB00550LB	38	73	2 - 3	1.3	2.72	1.30	3.53
WB00550LT	39	88	2 - 3	30	3.27	30.00	98.24
WB00600LB	40	62	2 - 3	0.355	2.28	0.36	0.81
WB00600LT	41	102	2 - 3	0.035	3.78	0.04	0.13
WB00650LB	42	161	2 - 3	0.41	5.96	0.41	2.44
WB00650LT	43	183	2 - 3	0.6	6.77	0.60	4.06
WB00700LB	44	125	2 - 3	0.04	4.64	0.04	0.19
WB00700LT	45	174	2 - 3	4.9	6.46	4.90	31.65
Totals:	--	4,387	--	--	162.49	--	10,483.15
Volume Weighted Average:						64.52	

**TABLE A-2
DOROTHY AMOS PARK - RIVERBANK SOILS
1- TO 3-FOOT DEPTH INCREMENT (EXISTING CONDITIONS) - FOR COMPARISON TO RECREATIONAL STANDARDS**

**ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

SUMMARY - 1- TO 3-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	4,387	--	--	324.97	--	21,198.24
Volume Weighted Average:							65.23

Notes:

1. Polygon ID and area are based on information shown on Figure A-2.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.

TABLE A-3
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 1-FOOT DEPTH INCREMENT (POST-REMEDATION CONDITIONS) - FOR COMPARISON TO RECREATIONAL STANDARDS

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

0- TO 0.5-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-7	1	165	0 - 0.5	3.6	3.06	3.60	11.00
DARB-8	2	78	0 - 0.5	1.8	1.45	1.80	2.61
DARB-9	3	64	0 - 0.5	1.8	1.19	1.80	2.14
SB-22	4	22	0 - 0.5	0.95	0.40	0.95	0.38
WB00050LB	5	12	0 - 0.5	0.05	0.23	0.05	0.01
WB00050LT	6	7	0 - 0.5	0.035	0.12	0.04	0.00
WB00100LB	7	15	0 - 0.5	0.2	0.28	0.20	0.06
WB00100LT	8	1	0 - 0.5	0.3	0.01	0.30	0.00
WB00150LB	9	37	0 - 0.5	0.0197	0.68	0.02	0.01
WB00150LT	10	62	0 - 0.5	0.0197	1.16	0.02	0.02
WB00200LB	11	119	0 - 0.5	0.9	2.20	0.90	1.98
WB00200LT	12	213	0 - 0.5	0.0197	3.94	0.02	0.08
WB00250LB	13	99	0 - 0.5	5.2	1.83	5.20	9.49
WB00250LT	14	144	0 - 0.5	6.3	2.66	6.30	16.76
WB00275LB	15	63	0 - 0.5	4	1.17	4.00	4.69
WB00275LT	16	66	0 - 0.5	0.0197	1.22	0.02	0.02
WB00300LB	17	48	0 - 0.5	0.0197	0.89	0.02	0.02
WB00300LT	18	91	0 - 0.5	0.0197	1.69	0.02	0.03
WB00325LB	19	76	0 - 0.5	0.0197	1.40	0.02	0.03
WB00325LT	20	92	0 - 0.5	34	1.71	34.00	58.09
WB00350LB	21	70	0 - 0.5	0.0197	1.30	0.02	0.03
WB00350LT	22	107	0 - 0.5	10	1.98	10.00	19.81
WB00375LB	23	88	0 - 0.5	19	1.63	19.00	30.95
WB00375LT	24	117	0 - 0.5	18	2.16	18.00	38.90
WB00400LB	25	118	0 - 0.5	8.4	2.19	8.40	18.36
WB00400LT	26	214	0 - 0.5	40	3.96	40.00	158.47
WB00450LB	27	159	0 - 0.5	6	2.94	6.00	17.62
WB00450LT	28	347	0 - 0.5	0.0197	6.42	0.02	0.13
WB00500LB	29	229	0 - 0.5	19	4.25	19.00	80.72
WB00500LT	30	215	0 - 0.5	0.0197	3.98	0.02	0.08
WB00550LB	31	143	0 - 0.5	8.7	2.65	8.70	23.07
WB00550LT	32	153	0 - 0.5	0.0197	2.83	0.02	0.06
WB00600LB	33	108	0 - 0.5	0.9	2.00	0.90	1.80
WB00600LT	34	149	0 - 0.5	6.4	2.76	6.40	17.69
WB00650LB	35	183	0 - 0.5	0.7	3.39	0.70	2.37
WB00650LT	36	215	0 - 0.5	2.7	3.97	2.70	10.73
WB00700LB	37	125	0 - 0.5	1.4	2.32	1.40	3.25
WB00700LT	38	174	0 - 0.5	13	3.23	13.00	41.98
Totals:	--	4,387	--	--	81.24	--	573.44
Volume Weighted Average:							7.06

TABLE A-3
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 1-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - FOR COMPARISON TO RECREATIONAL STANDARDS

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

0.5- TO 1-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-7	1	165	0.5 - 1	3.6	3.06	3.60	11.00
DARB-8	2	78	0.5 - 1	1.8	1.45	1.80	2.61
DARB-9	3	64	0.5 - 1	1.8	1.19	1.80	2.14
SB-22	4	22	0.5 - 1	1.6	0.40	1.60	0.64
WB00050LB	5	12	0.5 - 1	0.07	0.23	0.07	0.02
WB00050LT	6	7	0.5 - 1	0.035	0.12	0.04	0.00
WB00100LB	7	15	0.5 - 1	0.04	0.28	0.04	0.01
WB00100LT	8	1	0.5 - 1	0.3	0.01	0.30	0.00
WB00150LB	9	37	0.5 - 1	0.0197	0.68	0.02	0.01
WB00150LT	10	62	0.5 - 1	0.0197	1.16	0.02	0.02
WB00200LB	11	119	0.5 - 1	0.055	2.20	0.06	0.12
WB00200LT	12	213	0.5 - 1	0.0197	3.94	0.02	0.08
WB00250LB	13	99	0.5 - 1	0.08	1.83	0.08	0.15
WB00250LT	14	144	0.5 - 1	15	2.66	15.00	39.90
WB00275LB	15	63	0.5 - 1	0.7	1.17	0.70	0.82
WB00275LT	16	66	0.5 - 1	0.0197	1.22	0.02	0.02
WB00300LB	17	48	0.5 - 1	0.0197	0.89	0.02	0.02
WB00300LT	18	91	0.5 - 1	0.0197	1.69	0.02	0.03
WB00325LB	19	76	0.5 - 1	0.0197	1.40	0.02	0.03
WB00325LT	20	92	0.5 - 1	1.1	1.71	1.10	1.88
WB00350LB	21	70	0.5 - 1	0.0197	1.30	0.02	0.03
WB00350LT	22	107	0.5 - 1	6.7	1.98	6.70	13.27
WB00375LB	23	88	0.5 - 1	9.9	1.63	9.90	16.12
WB00375LT	24	117	0.5 - 1	0.4	2.16	0.40	0.86
WB00400LB	25	118	0.5 - 1	8.4	2.19	8.40	18.36
WB00400LT	26	214	0.5 - 1	20	3.96	20.00	79.23
WB00450LB	27	159	0.5 - 1	0.65	2.94	0.65	1.91
WB00450LT	28	347	0.5 - 1	0.0197	6.42	0.02	0.13
WB00500LB	29	229	0.5 - 1	6.1	4.25	6.10	25.91
WB00500LT	30	215	0.5 - 1	0.0197	3.98	0.02	0.08
WB00550LB	31	143	0.5 - 1	4	2.65	4.00	10.61
WB00550LT	32	153	0.5 - 1	0.0197	2.83	0.02	0.06
WB00600LB	33	108	0.5 - 1	0.3	2.00	0.30	0.60
WB00600LT	34	149	0.5 - 1	3.8	2.76	3.80	10.50
WB00650LB	35	183	0.5 - 1	1	3.39	1.00	3.39
WB00650LT	36	215	0.5 - 1	1	3.97	1.00	3.97
WB00700LB	37	125	0.5 - 1	0.035	2.32	0.04	0.08
WB00700LT	38	174	0.5 - 1	3.5	3.23	3.50	11.30
Totals:	--	4,387	--	--	81.24	--	255.93
Volume Weighted Average:						3.15	

**TABLE A-3
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 1-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - FOR COMPARISON TO RECREATIONAL STANDARDS**

**ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

SUMMARY - 0- TO 1-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	4,387	--	--	162.49	--	829.37
Volume Weighted Average:							5.10

Notes:

1. Polygon ID and area are based on information shown on Figures A-1.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.
5. Shaded numbers in bold and italics represent the placement of clean backfill material following the performance of the proposed remediation. The backfill concentration corresponds to the average PCB concentration as presented in the ACO Sites Backfill Data Set.

TABLE A-4
DOROTHY AMOS PARK - RIVERBANK SOILS
1- TO 3-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - FOR COMPARISON TO RECREATIONAL STANDARDS

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

1- TO 2-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-4	1	224	1 - 2	0.3	8.30	0.30	2.49
DARB-7	2	165	1 - 2	27.5	6.11	27.50	168.09
DARB-8	3	78	1 - 2	0.209	2.90	0.21	0.61
DARB-9	4	64	1 - 2	2.02	2.37	2.02	4.80
SB-22	5	22	1 - 2	1.3	0.80	1.30	1.04
SB-23	6	147	1 - 2	2.2	5.46	2.20	12.00
SB-24	7	203	1 - 2	20	7.52	20.00	150.45
SB-25	8	137	1 - 2	0.11	5.08	0.11	0.56
SB-26	9	36	1 - 2	1.1	1.32	1.10	1.46
SB-27	10	47	1 - 2	0.98	1.73	0.98	1.69
SB-28	46, 47	21	1 - 2	62	0.79	62.00	48.84
WB00050LB	12	12	1 - 2	0.035	0.46	0.04	0.02
WB00050LT	13	7	1 - 2	0.03	0.24	0.03	0.01
WB00100LB	14	15	1 - 2	0.03	0.56	0.03	0.02
WB00100LT	15	1	1 - 2	0.025	0.02	0.03	0.00
WB00150LB	16	37	1 - 2	0.8	1.35	0.80	1.08
WB00150LT	17	55	1 - 2	4.8	2.04	4.80	9.79
WB00200LB	18	113	1 - 2	0.05	4.20	0.05	0.21
WB00200LT	19	205	1 - 2	6.7	7.59	6.70	50.83
WB00250LB	20	88	1 - 2	0.09	3.26	0.09	0.29
WB00250LT	21	114	1 - 2	4.7	4.22	4.70	19.86
WB00275LB	22	59	1 - 2	0.03	2.20	0.03	0.07
WB00275LT	23	63	1 - 2	40	2.35	40.00	94.00
WB00300LB	24	48	1 - 2	79	1.78	79.00	140.37
WB00300LT	25	91	1 - 2	0.0197	3.37	0.02	0.07
WB00325LB	26	76	1 - 2	3.3	2.80	3.30	9.25
WB00325LT	27	92	1 - 2	2.4	3.42	2.40	8.20
WB00350LB	28	70	1 - 2	0.0197	2.60	0.02	0.05
WB00350LT	29	104	1 - 2	1.9	3.83	1.90	7.28
WB00375LB	30	86	1 - 2	0.9	3.17	0.90	2.85
WB00375LT	31	87	1 - 2	0.7	3.22	0.70	2.25
WB00400LB	32	117	1 - 2	8.4	4.33	8.40	36.35
WB00400LT	33	204	1 - 2	18	7.54	18.00	135.70
WB00450LB	34	125	1 - 2	0.825	4.65	0.83	3.83
WB00450LT	35	144	1 - 2	6.3	5.34	6.30	33.63
WB00500LB	36	131	1 - 2	0.85	4.85	0.85	4.12
WB00500LT	37	131	1 - 2	0.0197	4.85	0.02	0.10
WB00550LB	38	73	1 - 2	1.3	2.72	1.30	3.53
WB00550LT	39	88	1 - 2	30	3.27	30.00	98.24
WB00600LB	40	62	1 - 2	0.355	2.28	0.36	0.81
WB00600LT	41	102	1 - 2	0.035	3.78	0.04	0.13
WB00650LB	42	161	1 - 2	0.41	5.96	0.41	2.44
WB00650LT	43	183	1 - 2	0.6	6.77	0.60	4.06
WB00700LB	44	125	1 - 2	0.04	4.64	0.04	0.19
WB00700LT	45	174	1 - 2	4.9	6.46	4.90	31.65
Totals:	--	4,387	--	--	162.49	--	1,093.30
Volume Weighted Average:						6.73	

TABLE A-4

DOROTHY AMOS PARK - RIVERBANK SOILS

1- TO 3-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - FOR COMPARISON TO RECREATIONAL STANDARDS

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS2- TO 3-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-4	1	224	2 - 3	0.3	8.30	0.30	2.49
DARB-7	2	165	2 - 3	27.5	6.11	27.50	168.09
DARB-8	3	78	2 - 3	0.209	2.90	0.21	0.61
DARB-9	4	64	2 - 3	2.02	2.37	2.02	4.80
SB-22	5	22	2 - 3	2.75	0.80	2.75	2.20
SB-23	6	147	2 - 3	0.15	5.46	0.15	0.82
SB-24	7	203	2 - 3	1.6	7.52	1.60	12.04
SB-25	8	137	2 - 3	0.13	5.08	0.13	0.66
SB-26	9	36	2 - 3	0.22	1.32	0.22	0.29
SB-27	10	47	2 - 3	0.19	1.73	0.19	0.33
SB-28	46, 47	21	2 - 3	0.27	0.79	0.27	0.21
WB00050LB	12	12	2 - 3	0.035	0.46	0.04	0.02
WB00050LT	13	7	2 - 3	0.03	0.24	0.03	0.01
WB00100LB	14	15	2 - 3	0.03	0.56	0.03	0.02
WB00100LT	15	1	2 - 3	0.025	0.02	0.03	0.00
WB00150LB	16	37	2 - 3	0.8	1.35	0.80	1.08
WB00150LT	17	55	2 - 3	4.8	2.04	4.80	9.79
WB00200LB	18	113	2 - 3	0.05	4.20	0.05	0.21
WB00200LT	19	205	2 - 3	6.7	7.59	6.70	50.83
WB00250LB	20	88	2 - 3	0.09	3.26	0.09	0.29
WB00250LT	21	114	2 - 3	4.7	4.22	4.70	19.86
WB00275LB	22	59	2 - 3	0.03	2.20	0.03	0.07
WB00275LT	23	63	2 - 3	40	2.35	40.00	94.00
WB00300LB	24	48	2 - 3	79	1.78	79.00	140.37
WB00300LT	25	91	2 - 3	0.0197	3.37	0.02	0.07
WB00325LB	26	76	2 - 3	3.3	2.80	3.30	9.25
WB00325LT	27	92	2 - 3	2.4	3.42	2.40	8.20
WB00350LB	28	70	2 - 3	0.0197	2.60	0.02	0.05
WB00350LT	29	104	2 - 3	1.9	3.83	1.90	7.28
WB00375LB	30	86	2 - 3	0.9	3.17	0.90	2.85
WB00375LT	31	87	2 - 3	0.7	3.22	0.70	2.25
WB00400LB	32	117	2 - 3	0.9	4.33	0.90	3.90
WB00400LT	33	204	2 - 3	18	7.54	18.00	135.70
WB00450LB	34	125	2 - 3	0.825	4.65	0.83	3.83
WB00450LT	35	144	2 - 3	6.3	5.34	6.30	33.63
WB00500LB	36	131	2 - 3	0.85	4.85	0.85	4.12
WB00500LT	37	131	2 - 3	0.0197	4.85	0.02	0.10
WB00550LB	38	73	2 - 3	1.3	2.72	1.30	3.53
WB00550LT	39	88	2 - 3	30	3.27	30.00	98.24
WB00600LB	40	62	2 - 3	0.355	2.28	0.36	0.81
WB00600LT	41	102	2 - 3	0.035	3.78	0.04	0.13
WB00650LB	42	161	2 - 3	0.41	5.96	0.41	2.44
WB00650LT	43	183	2 - 3	0.6	6.77	0.60	4.06
WB00700LB	44	125	2 - 3	0.04	4.64	0.04	0.19
WB00700LT	45	174	2 - 3	4.9	6.46	4.90	31.65
Totals:	--	4,387	--	--	162.49	--	861.35
						Volume Weighted Average:	5.30

TABLE A-4
DOROTHY AMOS PARK - RIVERBANK SOILS
1- TO 3-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - FOR COMPARISON TO RECREATIONAL STANDARDS

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

SUMMARY - 1- TO 3-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	4,387	--	--	324.97	--	1,954.65
Volume Weighted Average:							6.01

Notes:

1. Polygon ID and area are based on information shown on Figures A-2.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.
5. Shaded numbers in bold and italics represent the placement of clean backfill material following the performance of the proposed remediation. The backfill concentration corresponds to the average PCB concentration as presented in the ACO Sites Backfill Data Set.

**TABLE A-5
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 6-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - BASED ON APPLICATION OF RECREATIONAL STANDARDS**

**ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

0- TO 1-FOOT DEPTH INCREMENT (TABLE A-3)

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	4,387	--	--	162.49	--	829.37
Volume Weighted Average:							5.10

1- TO 3-FOOT DEPTH INCREMENT (TABLE A-4)

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	4,387	--	--	324.97	--	1,954.65
Volume Weighted Average:							6.01

3- TO 6-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-1	23	63	3 - 4	0.77	2.35	0.77	1.81
DARB-2	25	91	3 - 4	0.0197	10.12	7.34	74.26
			4 - 6	11			
DARB-3	24	48	3 - 4	0.35	1.78	0.35	0.62
DARB-5	37	131	3 - 4	0.0197	14.55	1.54	22.40
			4 - 6	2.3			
DARB-6	39	88	3 - 4	1.3	3.27	1.30	4.26
DARB-7	2	165	3 - 4	0.67	6.11	0.67	4.10
DARB-8	3	78	3 - 4	0.7	2.90	0.70	2.03
DARB-9	4	64	3 - 4	6.3	7.12	2.17	15.48
			4 - 6	0.11			
DARB-10	17	55	3 - 4	0.43	2.04	0.43	0.88
DARB-11	19	205	3 - 4	0.25	7.59	0.25	1.90
DARB-12	21	114	3 - 4	0.018	4.22	0.02	0.08
DARB-13	27	92	3 - 4	0.13	3.42	0.13	0.44
DARB-14	26	76	3 - 4	0.605	2.80	0.61	1.69
DARB-15	28	70	3 - 4	0.0197	7.80	0.10	0.78
			4 - 6	0.14			
DARB-16	33	204	3 - 4	0.35	7.54	0.35	2.64
DARB-17	35	144	3 - 4	1.9	5.34	1.90	10.14
DARB-18	45	174	3 - 4	1.5	6.46	1.50	9.69
SB-22	5	22	3 - 4	2.75	0.80	2.75	2.20
SB-23	6	147	3 - 4	0.15	5.46	0.15	0.82
SB-24	7	203	3 - 4	1.6	7.52	1.60	12.04
SB-25	8	137	3 - 4	0.13	5.08	0.13	0.66
SB-26	9	36	3 - 4	0.22	1.32	0.22	0.29
SB-27	10	47	3 - 4	0.19	1.73	0.19	0.33
SB-28	46, 47	21	3 - 4	0.27	0.79	0.27	0.21
Totals:	--	2,476	--	--	118.10	--	169.74
Volume Weighted Average:							1.44

**TABLE A-5
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 6-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - BASED ON APPLICATION OF RECREATIONAL STANDARDS**

**ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

SUMMARY - 0- TO 6-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	3,750	--	--	605.56	--	2,953.76
Volume Weighted Average:							4.88

Notes:

1. Polygon ID and area are based on information shown on Figures A-3.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.
5. Shaded numbers in bold and italics represent the placement of clean backfill material following the performance of the proposed remediation. The backfill concentration corresponds to the average PCB concentration as presented in the ACO Sites Backfill Data Set.

S:\P-85-DNW-LAF-LAYER-ON-*.OFF-REF*
 G:\GE_ACTIVE\N\20685001\SSSR\ADDENDUM\REPORT\20685001.DWG
 PENTABLE:PLT\FULL.CTB
 PRINTED:10/27/2006 10:53 AM BY:LFORAKER
 LAYOUT:A-1
 PAGES:10/27/2006 10:52 AM
 PROJECT NAME: 20685X02
 REFERENCE IMAGES: 20685X00



NOTES:

1. BASE MAP PREPARED BASED ON SURVEY INFORMATION (8/15/97 AND 9/18, 22/97) BY HILL ENGINEERS, ARCHITECTS AND PLANNERS.
2. ALL EXISTING GE SAMPLING, BORING, AND MONITORING WELL LOCATIONS WERE SURVEYED BY BBL, INC.
3. ONLY THOSE EXISTING SAMPLE LOCATIONS LOCATED IN VICINITY OF RIVER/RIVERBANK AREA ARE SHOWN ON THIS FIGURE.
4. MDEP SAMPLE LOCATION IDs CONSIST OF THE MDEP TRANSECTS SHOWN ON THIS FIGURE, FOLLOWED BY THE LETTERS LT OR LB (DESIGNATING THE LEFT TOP, LEFT BOTTOM OF BANK, RESPECTIVELY, LOOKING DOWNSTREAM).
5. MDEP SAMPLES ON THE RIGHT BANK (LOOKING DOWNSTREAM) HAD PCB CONCENTRATIONS OF 1.4 PPM OR LESS. THEREFORE NO FURTHER DELINEATION WAS REQUIRED AND THE SAMPLES HAVE NOT BEEN SHOWN ON THIS FIGURE.

LEGEND:

- PRIOR GE SOIL BORING LOCATION (PRE-2005)
- MDEP BANK SOIL SAMPLE LOCATION (2000)
- GE BANK SAMPLE LOCATION (2005)
- UTILITY POLE
- CHAIN LINK FENCE
- PROPERTY LINE
- EDGE OF BRUSH
- DECIDUOUS TREE
- HORIZONTAL LIMITS OF REMEDIATION PERFORMED BY GE IN 1998 IN VICINITY OF RIVERBANK (REMOVAL DEPTH VARIES)
- MDEP TRANSECT AND ID
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH
- POLYGON ID
- AREA PROPOSED FOR PCB SOIL REMOVAL



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
WEST BRANCH OF HOUSATONIC RIVER
ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING
SUMMARY REPORT

THEISSEN POLYGON MAP
0- TO 1-FOOT DEPTH INCREMENT
COMPARISON TO RECREATIONAL STANDARDS



FIGURE
A-1

S:\P-85-DNW-LAF-LAYER-ON-*.OFF-REF*
 G:\GE_ACTIVE\N\20685001\SSSR\ADDENDUM\REPORT\2068502.DWG
 PENTABLE.PLT FULL CTB PRINTED: 10/27/2006 10:54 AM BY: LFORAKER
 PROJECT NAME: 20685X02
 PREFERENCES: 20685X02
 20685X00



NOTES:

1. BASE MAP PREPARED BASED ON SURVEY INFORMATION (8/15/97 AND 9/18, 22/97) BY HILL ENGINEERS, ARCHITECTS AND PLANNERS.
2. ALL EXISTING GE SAMPLING, BORING, AND MONITORING WELL LOCATIONS WERE SURVEYED BY BBL, INC.
3. ONLY THOSE EXISTING SAMPLE LOCATIONS LOCATED IN VICINITY OF RIVER/RIVERBANK AREA ARE SHOWN ON THIS FIGURE.
4. MDEP SAMPLE LOCATION IDs CONSIST OF THE MDEP TRANSECTS SHOWN ON THIS FIGURE, FOLLOWED BY THE LETTERS LT OR LB (DESIGNATING THE LEFT TOP, LEFT BOTTOM OF BANK, RESPECTIVELY, LOOKING DOWNSTREAM).
5. MDEP SAMPLES ON THE RIGHT BANK (LOOKING DOWNSTREAM) HAD PCB CONCENTRATIONS OF 1.4 PPM OR LESS. THEREFORE NO FURTHER DELINEATION WAS REQUIRED AND THE SAMPLES HAVE NOT BEEN SHOWN ON THIS FIGURE.

LEGEND:

- PRIOR GE SOIL BORING LOCATION (PRE-2005)
- MDEP BANK SOIL SAMPLE LOCATION (2000)
- GE BANK SAMPLE LOCATION (2005)
- UTILITY POLE
- CHAIN LINK FENCE
- PROPERTY LINE
- EDGE OF BRUSH
- DECIDUOUS TREE
- HORIZONTAL LIMITS OF REMEDIATION PERFORMED BY GE IN 1998 IN VICINITY OF RIVERBANK (REMOVAL DEPTH VARIES)
- MDEP TRANSECT AND ID
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH
- POLYGON ID
- AREA PROPOSED FOR PCB SOIL REMOVAL
- REMOVAL DEPTH



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
WEST BRANCH OF HOUSATONIC RIVER
ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING
SUMMARY REPORT

THEISSEN POLYGON MAP
GREATER THAN 1- FOOT DEPTH INCREMENT
COMPARISON TO RECREATIONAL STANDARDS



FIGURE
A-2

Attachment B

Riverbank PCB Spatial Averaging Evaluation Tables and Theissen Polygon Figures – Comparison to Method 1 Soil Standards

TABLE B-1
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 1-FOOT DEPTH INCREMENT (EXISTING CONDITIONS) - FOR COMPARISON TO METHOD 1 SOIL STANDARD

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

0- TO 0.5-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-7	1	165	0 - 0.5	3.6	3.06	3.60	11.00
DARB-8	2	78	0 - 0.5	1.8	1.45	1.80	2.61
DARB-9	3	64	0 - 0.5	1.8	1.19	1.80	2.14
SB-22	4	22	0 - 0.5	0.95	0.40	0.95	0.38
WB00050LB	5	12	0 - 0.5	0.05	0.23	0.05	0.01
WB00050LT	6	7	0 - 0.5	0.035	0.12	0.04	0.00
WB00100LB	7	15	0 - 0.5	0.2	0.28	0.20	0.06
WB00100LT	8	1	0 - 0.5	0.3	0.01	0.30	0.00
WB00150LB	9	37	0 - 0.5	65	0.68	65.00	43.96
WB00150LT	10	62	0 - 0.5	2.8	1.16	2.80	3.24
WB00200LB	11	119	0 - 0.5	0.9	2.20	0.90	1.98
WB00200LT	12	213	0 - 0.5	2.7	3.94	2.70	10.65
WB00250LB	13	99	0 - 0.5	5.2	1.83	5.20	9.49
WB00250LT	14	144	0 - 0.5	6.3	2.66	6.30	16.76
WB00275LB	15	63	0 - 0.5	4	1.17	4.00	4.69
WB00275LT	16	66	0 - 0.5	64	1.22	64.00	78.32
WB00300LB	17	48	0 - 0.5	290	0.89	290.00	257.63
WB00300LT	18	91	0 - 0.5	6,200	1.69	6,200.00	10,454.12
WB00325LB	19	76	0 - 0.5	160	1.40	160.00	224.13
WB00325LT	20	92	0 - 0.5	34	1.71	34.00	58.09
WB00350LB	21	70	0 - 0.5	38	1.30	38.00	49.40
WB00350LT	22	107	0 - 0.5	10	1.98	10.00	19.81
WB00375LB	23	88	0 - 0.5	19	1.63	19.00	30.95
WB00375LT	24	117	0 - 0.5	18	2.16	18.00	38.90
WB00400LB	25	118	0 - 0.5	8.4	2.19	8.40	18.36
WB00400LT	26	214	0 - 0.5	40	3.96	40.00	158.47
WB00450LB	27	159	0 - 0.5	6	2.94	6.00	17.62
WB00450LT	28	347	0 - 0.5	40	6.42	40.00	256.91
WB00500LB	29	229	0 - 0.5	19	4.25	19.00	80.72
WB00500LT	30	215	0 - 0.5	13	3.98	13.00	51.72
WB00550LB	31	143	0 - 0.5	8.7	2.65	8.70	23.07
WB00550LT	32	153	0 - 0.5	47	2.83	47.00	133.08
WB00600LB	33	108	0 - 0.5	0.9	2.00	0.90	1.80
WB00600LT	34	149	0 - 0.5	6.4	2.76	6.40	17.69
WB00650LB	35	183	0 - 0.5	0.7	3.39	0.70	2.37
WB00650LT	36	215	0 - 0.5	2.7	3.97	2.70	10.73
WB00700LB	37	125	0 - 0.5	1.4	2.32	1.40	3.25
WB00700LT	38	174	0 - 0.5	13	3.23	13.00	41.98
Totals:	--	4,387	--	--	81.24	--	12,136.10
Volume Weighted Average:							149.38

TABLE B-1
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 1-FOOT DEPTH INCREMENT (EXISTING CONDITIONS) - FOR COMPARISON TO METHOD 1 SOIL STANDARD

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

0.5- TO 1-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-7	1	165	0.5 - 1	3.6	3.06	3.60	11.00
DARB-8	2	78	0.5 - 1	1.8	1.45	1.80	2.61
DARB-9	3	64	0.5 - 1	1.8	1.19	1.80	2.14
SB-22	4	22	0.5 - 1	1.6	0.40	1.60	0.64
WB00050LB	5	12	0.5 - 1	0.07	0.23	0.07	0.02
WB00050LT	6	7	0.5 - 1	0.035	0.12	0.04	0.00
WB00100LB	7	15	0.5 - 1	0.04	0.28	0.04	0.01
WB00100LT	8	1	0.5 - 1	0.3	0.01	0.30	0.00
WB00150LB	9	37	0.5 - 1	0.6	0.68	0.60	0.41
WB00150LT	10	62	0.5 - 1	58	1.16	58.00	67.03
WB00200LB	11	119	0.5 - 1	0.055	2.20	0.06	0.12
WB00200LT	12	213	0.5 - 1	53	3.94	53.00	209.07
WB00250LB	13	99	0.5 - 1	0.08	1.83	0.08	0.15
WB00250LT	14	144	0.5 - 1	15	2.66	15.00	39.90
WB00275LB	15	63	0.5 - 1	0.7	1.17	0.70	0.82
WB00275LT	16	66	0.5 - 1	25	1.22	25.00	30.59
WB00300LB	17	48	0.5 - 1	110	0.89	110.00	97.72
WB00300LT	18	91	0.5 - 1	4,500	1.69	4,500.00	7,587.67
WB00325LB	19	76	0.5 - 1	27	1.40	27.00	37.82
WB00325LT	20	92	0.5 - 1	1.1	1.71	1.10	1.88
WB00350LB	21	70	0.5 - 1	80	1.30	80.00	104.00
WB00350LT	22	107	0.5 - 1	6.7	1.98	6.70	13.27
WB00375LB	23	88	0.5 - 1	9.9	1.63	9.90	16.12
WB00375LT	24	117	0.5 - 1	0.4	2.16	0.40	0.86
WB00400LB	25	118	0.5 - 1	8.4	2.19	8.40	18.36
WB00400LT	26	214	0.5 - 1	20	3.96	20.00	79.23
WB00450LB	27	159	0.5 - 1	0.65	2.94	0.65	1.91
WB00450LT	28	347	0.5 - 1	200	6.42	200.00	1,284.56
WB00500LB	29	229	0.5 - 1	6.1	4.25	6.10	25.91
WB00500LT	30	215	0.5 - 1	330	3.98	330.00	1,312.93
WB00550LB	31	143	0.5 - 1	4	2.65	4.00	10.61
WB00550LT	32	153	0.5 - 1	89	2.83	89.00	252.01
WB00600LB	33	108	0.5 - 1	0.3	2.00	0.30	0.60
WB00600LT	34	149	0.5 - 1	3.8	2.76	3.80	10.50
WB00650LB	35	183	0.5 - 1	1	3.39	1.00	3.39
WB00650LT	36	215	0.5 - 1	1	3.97	1.00	3.97
WB00700LB	37	125	0.5 - 1	0.035	2.32	0.04	0.08
WB00700LT	38	174	0.5 - 1	3.5	3.23	3.50	11.30
Totals:	--	4,387	--	--	81.24	--	11,239.24
Volume Weighted Average:						138.34	

**TABLE B-1
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 1-FOOT DEPTH INCREMENT (EXISTING CONDITIONS) - FOR COMPARISON TO METHOD 1 SOIL STANDARD**

**ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

SUMMARY - 0- TO 1-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	4,387	--	--	162.49	--	23,375.34
Volume Weighted Average:							143.86

Notes:

1. Polygon ID and area are based on information shown on Figure B-1.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.

TABLE B-2
DOROTHY AMOS PARK - RIVERBANK SOILS
1- TO 6-FOOT DEPTH INCREMENT (EXISTING CONDITIONS) - FOR COMPARISON TO METHOD 1 SOIL STANDARD

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

1- TO 2-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-4	1	224	1 - 2	0.3	8.30	0.30	2.49
DARB-7	2	165	1 - 2	27.5	6.11	27.50	168.09
DARB-8	3	78	1 - 2	0.209	2.90	0.21	0.61
DARB-9	4	64	1 - 2	2.02	2.37	2.02	4.80
SB-22	5	22	1 - 2	1.3	0.80	1.30	1.04
SB-23	6	147	1 - 2	2.2	5.46	2.20	12.00
SB-24	7	203	1 - 2	20	7.52	20.00	150.45
SB-25	8	137	1 - 2	0.11	5.08	0.11	0.56
SB-26	9	36	1 - 2	1.1	1.32	1.10	1.46
SB-27	10	47	1 - 2	0.98	1.73	0.98	1.69
SB-28	46, 47	21	1 - 2	62	0.79	62.00	48.84
WB00050LB	12	12	1 - 2	0.035	0.46	0.04	0.02
WB00050LT	13	7	1 - 2	0.03	0.24	0.03	0.01
WB00100LB	14	15	1 - 2	0.03	0.56	0.03	0.02
WB00100LT	15	1	1 - 2	0.025	0.02	0.03	0.00
WB00150LB	16	37	1 - 2	0.8	1.35	0.80	1.08
WB00150LT	17	55	1 - 2	4.8	2.04	4.80	9.79
WB00200LB	18	113	1 - 2	0.05	4.20	0.05	0.21
WB00200LT	19	205	1 - 2	6.7	7.59	6.70	50.83
WB00250LB	20	88	1 - 2	0.09	3.26	0.09	0.29
WB00250LT	21	114	1 - 2	4.7	4.22	4.70	19.86
WB00275LB	22	59	1 - 2	0.03	2.20	0.03	0.07
WB00275LT	23	63	1 - 2	40	2.35	40.00	94.00
WB00300LB	24	48	1 - 2	79	1.78	79.00	140.37
WB00300LT	25	91	1 - 2	2,800	3.37	2,800.00	9,442.43
WB00325LB	26	76	1 - 2	3.3	2.80	3.30	9.25
WB00325LT	27	92	1 - 2	2.4	3.42	2.40	8.20
WB00350LB	28	70	1 - 2	3.8	2.60	3.80	9.88
WB00350LT	29	104	1 - 2	1.9	3.83	1.90	7.28
WB00375LB	30	86	1 - 2	0.9	3.17	0.90	2.85
WB00375LT	31	87	1 - 2	0.7	3.22	0.70	2.25
WB00400LB	32	117	1 - 2	8.4	4.33	8.40	36.35
WB00400LT	33	204	1 - 2	18	7.54	18.00	135.70
WB00450LB	34	125	1 - 2	0.825	4.65	0.83	3.83
WB00450LT	35	144	1 - 2	6.3	5.34	6.30	33.63
WB00500LB	36	131	1 - 2	0.85	4.85	0.85	4.12
WB00500LT	37	131	1 - 2	35	4.85	35.00	169.70
WB00550LB	38	73	1 - 2	1.3	2.72	1.30	3.53
WB00550LT	39	88	1 - 2	30	3.27	30.00	98.24
WB00600LB	40	62	1 - 2	0.355	2.28	0.36	0.81
WB00600LT	41	102	1 - 2	0.035	3.78	0.04	0.13
WB00650LB	42	161	1 - 2	0.41	5.96	0.41	2.44
WB00650LT	43	183	1 - 2	0.6	6.77	0.60	4.06
WB00700LB	44	125	1 - 2	0.04	4.64	0.04	0.19
WB00700LT	45	174	1 - 2	4.9	6.46	4.90	31.65
Totals:	--	4,387	--	--	162.49	--	10,715.10
Volume Weighted Average:						65.94	

TABLE B-2
DOROTHY AMOS PARK - RIVERBANK SOILS
1- TO 6-FOOT DEPTH INCREMENT (EXISTING CONDITIONS) - FOR COMPARISON TO METHOD 1 SOIL STANDARD

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

2- TO 3-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-4	1	224	2 - 3	0.3	8.30	0.30	2.49
DARB-7	2	165	2 - 3	27.5	6.11	27.50	168.09
DARB-8	3	78	2 - 3	0.209	2.90	0.21	0.61
DARB-9	4	64	2 - 3	2.02	2.37	2.02	4.80
SB-22	5	22	2 - 3	2.75	0.80	2.75	2.20
SB-23	6	147	2 - 3	0.15	5.46	0.15	0.82
SB-24	7	203	2 - 3	1.6	7.52	1.60	12.04
SB-25	8	137	2 - 3	0.13	5.08	0.13	0.66
SB-26	9	36	2 - 3	0.22	1.32	0.22	0.29
SB-27	10	47	2 - 3	0.19	1.73	0.19	0.33
SB-28	46, 47	21	2 - 3	0.27	0.79	0.27	0.21
WB00050LB	12	12	2 - 3	0.035	0.46	0.04	0.02
WB00050LT	13	7	2 - 3	0.03	0.24	0.03	0.01
WB00100LB	14	15	2 - 3	0.03	0.56	0.03	0.02
WB00100LT	15	1	2 - 3	0.025	0.02	0.03	0.00
WB00150LB	16	37	2 - 3	0.8	1.35	0.80	1.08
WB00150LT	17	55	2 - 3	4.8	2.04	4.80	9.79
WB00200LB	18	113	2 - 3	0.05	4.20	0.05	0.21
WB00200LT	19	205	2 - 3	6.7	7.59	6.70	50.83
WB00250LB	20	88	2 - 3	0.09	3.26	0.09	0.29
WB00250LT	21	114	2 - 3	4.7	4.22	4.70	19.86
WB00275LB	22	59	2 - 3	0.03	2.20	0.03	0.07
WB00275LT	23	63	2 - 3	40	2.35	40.00	94.00
WB00300LB	24	48	2 - 3	79	1.78	79.00	140.37
WB00300LT	25	91	2 - 3	2,800	3.37	2,800.00	9,442.43
WB00325LB	26	76	2 - 3	3.3	2.80	3.30	9.25
WB00325LT	27	92	2 - 3	2.4	3.42	2.40	8.20
WB00350LB	28	70	2 - 3	3.8	2.60	3.80	9.88
WB00350LT	29	104	2 - 3	1.9	3.83	1.90	7.28
WB00375LB	30	86	2 - 3	0.9	3.17	0.90	2.85
WB00375LT	31	87	2 - 3	0.7	3.22	0.70	2.25
WB00400LB	32	117	2 - 3	0.9	4.33	0.90	3.90
WB00400LT	33	204	2 - 3	18	7.54	18.00	135.70
WB00450LB	34	125	2 - 3	0.825	4.65	0.83	3.83
WB00450LT	35	144	2 - 3	6.3	5.34	6.30	33.63
WB00500LB	36	131	2 - 3	0.85	4.85	0.85	4.12
WB00500LT	37	131	2 - 3	35	4.85	35.00	169.70
WB00550LB	38	73	2 - 3	1.3	2.72	1.30	3.53
WB00550LT	39	88	2 - 3	30	3.27	30.00	98.24
WB00600LB	40	62	2 - 3	0.355	2.28	0.36	0.81
WB00600LT	41	102	2 - 3	0.035	3.78	0.04	0.13
WB00650LB	42	161	2 - 3	0.41	5.96	0.41	2.44
WB00650LT	43	183	2 - 3	0.6	6.77	0.60	4.06
WB00700LB	44	125	2 - 3	0.04	4.64	0.04	0.19
WB00700LT	45	174	2 - 3	4.9	6.46	4.90	31.65
Totals:	--	4,387	--	--	162.49	--	10,483.15
Volume Weighted Average:						64.52	

TABLE B-2
DOROTHY AMOS PARK - RIVERBANK SOILS
1- TO 6-FOOT DEPTH INCREMENT (EXISTING CONDITIONS) - FOR COMPARISON TO METHOD 1 SOIL STANDARD

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

3- TO 6-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-1	23	63	3 - 4	0.77	2.35	0.77	1.81
DARB-2	25	91	3 - 4	220	10.12	80.67	816.10
			4 - 6	11			
DARB-3	24	48	3 - 4	0.35	1.78	0.35	0.62
DARB-5	37	131	3 - 4	230	14.55	78.20	1,137.44
			4 - 6	2.3			
DARB-6	39	88	3 - 4	1.3	3.27	1.30	4.26
DARB-7	2	165	3 - 4	0.67	6.11	0.67	4.10
DARB-8	3	78	3 - 4	0.7	2.90	0.70	2.03
DARB-9	4	64	3 - 4	6.3	7.12	2.17	15.48
			4 - 6	0.11			
DARB-10	17	55	3 - 4	0.43	2.04	0.43	0.88
DARB-11	19	205	3 - 4	0.25	7.59	0.25	1.90
DARB-12	21	114	3 - 4	0.018	4.22	0.02	0.08
DARB-13	27	92	3 - 4	0.13	3.42	0.13	0.44
DARB-14	26	76	3 - 4	0.605	2.80	0.61	1.69
DARB-15	28	70	3 - 4	790	7.80	263.43	2,054.73
			4 - 6	0.14			
DARB-16	33	204	3 - 4	0.35	7.54	0.35	2.64
DARB-17	35	144	3 - 4	1.9	5.34	1.90	10.14
DARB-18	45	174	3 - 4	1.5	6.46	1.50	9.69
SB-22	5	22	3 - 4	2.75	0.80	2.75	2.20
SB-23	6	147	3 - 4	0.15	5.46	0.15	0.82
SB-24	7	203	3 - 4	1.6	7.52	1.60	12.04
SB-25	8	137	3 - 4	0.13	5.08	0.13	0.66
SB-26	9	36	3 - 4	0.22	1.32	0.22	0.29
SB-27	10	47	3 - 4	0.19	1.73	0.19	0.33
SB-28	46, 47	21	3 - 4	0.27	0.79	0.27	0.21
Totals:	--	2,476	--	--	118.10	--	4,080.58
Volume Weighted Average:							34.55

SUMMARY - 1- TO 6-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	3,750	--	--	443.08	--	25,278.82
Volume Weighted Average:							57.05

Notes:

1. Polygon ID and area are based on information shown on Figure B-2.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.

TABLE B-3
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 1-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - FOR COMPARISON TO METHOD 1 SOIL STANDARD

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

0- TO 0.5-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-7	1	165	0 - 0.5	0.0197	3.06	0.02	0.06
DARB-8	2	78	0 - 0.5	1.8	1.45	1.80	2.61
DARB-9	3	64	0 - 0.5	1.8	1.19	1.80	2.14
SB-22	4	22	0 - 0.5	0.95	0.40	0.95	0.38
WB00050LB	5	12	0 - 0.5	0.05	0.23	0.05	0.01
WB00050LT	6	7	0 - 0.5	0.035	0.12	0.04	0.00
WB00100LB	7	15	0 - 0.5	0.2	0.28	0.20	0.06
WB00100LT	8	1	0 - 0.5	0.3	0.01	0.30	0.00
WB00150LB	9	37	0 - 0.5	0.0197	0.68	0.02	0.01
WB00150LT	10	62	0 - 0.5	0.0197	1.16	0.02	0.02
WB00200LB	11	119	0 - 0.5	0.9	2.20	0.90	1.98
WB00200LT	12	213	0 - 0.5	0.0197	3.94	0.02	0.08
WB00250LB	13	99	0 - 0.5	5.2	1.83	5.20	9.49
WB00250LT	14	144	0 - 0.5	0.0197	2.66	0.02	0.05
WB00275LB	15	63	0 - 0.5	4	1.17	4.00	4.69
WB00275LT	16	66	0 - 0.5	0.0197	1.22	0.02	0.02
WB00300LB	17	48	0 - 0.5	0.0197	0.89	0.02	0.02
WB00300LT	18	91	0 - 0.5	0.0197	1.69	0.02	0.03
WB00325LB	19	76	0 - 0.5	0.0197	1.40	0.02	0.03
WB00325LT	20	92	0 - 0.5	0.0197	1.71	0.02	0.03
WB00350LB	21	70	0 - 0.5	0.0197	1.30	0.02	0.03
WB00350LT	22	107	0 - 0.5	10	1.98	10.00	19.81
WB00375LB	23	88	0 - 0.5	0.0197	1.63	0.02	0.03
WB00375LT	24	117	0 - 0.5	0.0197	2.16	0.02	0.04
WB00400LB	25	118	0 - 0.5	8.4	2.19	8.40	18.36
WB00400LT	26	214	0 - 0.5	0.0197	3.96	0.02	0.08
WB00450LB	27	159	0 - 0.5	6	2.94	6.00	17.62
WB00450LT	28	347	0 - 0.5	0.0197	6.42	0.02	0.13
WB00500LB	29	229	0 - 0.5	0.0197	4.25	0.02	0.08
WB00500LT	30	215	0 - 0.5	0.0197	3.98	0.02	0.08
WB00550LB	31	143	0 - 0.5	8.7	2.65	8.70	23.07
WB00550LT	32	153	0 - 0.5	0.0197	2.83	0.02	0.06
WB00600LB	33	108	0 - 0.5	0.9	2.00	0.90	1.80
WB00600LT	34	149	0 - 0.5	6.4	2.76	6.40	17.69
WB00650LB	35	183	0 - 0.5	0.7	3.39	0.70	2.37
WB00650LT	36	215	0 - 0.5	2.7	3.97	2.70	10.73
WB00700LB	37	125	0 - 0.5	1.4	2.32	1.40	3.25
WB00700LT	38	174	0 - 0.5	0.0197	3.23	0.02	0.06
Totals:	--	4,387	--	--	81.24	--	137.02
Volume Weighted Average:							1.69

TABLE B-3
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 1-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - FOR COMPARISON TO METHOD 1 SOIL STANDARD

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

0.5- TO 1-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-7	1	165	0.5 - 1	0.0197	3.06	0.02	0.06
DARB-8	2	78	0.5 - 1	1.8	1.45	1.80	2.61
DARB-9	3	64	0.5 - 1	1.8	1.19	1.80	2.14
SB-22	4	22	0.5 - 1	1.6	0.40	1.60	0.64
WB00050LB	5	12	0.5 - 1	0.07	0.23	0.07	0.02
WB00050LT	6	7	0.5 - 1	0.035	0.12	0.04	0.00
WB00100LB	7	15	0.5 - 1	0.04	0.28	0.04	0.01
WB00100LT	8	1	0.5 - 1	0.3	0.01	0.30	0.00
WB00150LB	9	37	0.5 - 1	0.0197	0.68	0.02	0.01
WB00150LT	10	62	0.5 - 1	0.0197	1.16	0.02	0.02
WB00200LB	11	119	0.5 - 1	0.055	2.20	0.06	0.12
WB00200LT	12	213	0.5 - 1	0.0197	3.94	0.02	0.08
WB00250LB	13	99	0.5 - 1	0.08	1.83	0.08	0.15
WB00250LT	14	144	0.5 - 1	0.0197	2.66	0.02	0.05
WB00275LB	15	63	0.5 - 1	0.7	1.17	0.70	0.82
WB00275LT	16	66	0.5 - 1	0.0197	1.22	0.02	0.02
WB00300LB	17	48	0.5 - 1	0.0197	0.89	0.02	0.02
WB00300LT	18	91	0.5 - 1	0.0197	1.69	0.02	0.03
WB00325LB	19	76	0.5 - 1	0.0197	1.40	0.02	0.03
WB00325LT	20	92	0.5 - 1	0.0197	1.71	0.02	0.03
WB00350LB	21	70	0.5 - 1	0.0197	1.30	0.02	0.03
WB00350LT	22	107	0.5 - 1	6.7	1.98	6.70	13.27
WB00375LB	23	88	0.5 - 1	0.0197	1.63	0.02	0.03
WB00375LT	24	117	0.5 - 1	0.0197	2.16	0.02	0.04
WB00400LB	25	118	0.5 - 1	8.4	2.19	8.40	18.36
WB00400LT	26	214	0.5 - 1	0.0197	3.96	0.02	0.08
WB00450LB	27	159	0.5 - 1	0.65	2.94	0.65	1.91
WB00450LT	28	347	0.5 - 1	0.0197	6.42	0.02	0.13
WB00500LB	29	229	0.5 - 1	0.0197	4.25	0.02	0.08
WB00500LT	30	215	0.5 - 1	0.0197	3.98	0.02	0.08
WB00550LB	31	143	0.5 - 1	4	2.65	4.00	10.61
WB00550LT	32	153	0.5 - 1	0.0197	2.83	0.02	0.06
WB00600LB	33	108	0.5 - 1	0.3	2.00	0.30	0.60
WB00600LT	34	149	0.5 - 1	3.8	2.76	3.80	10.50
WB00650LB	35	183	0.5 - 1	1	3.39	1.00	3.39
WB00650LT	36	215	0.5 - 1	1	3.97	1.00	3.97
WB00700LB	37	125	0.5 - 1	0.035	2.32	0.04	0.08
WB00700LT	38	174	0.5 - 1	0.0197	3.23	0.02	0.06
Totals:	--	4,387	--	--	81.24	--	70.16
Volume Weighted Average:						0.86	

**TABLE B-3
DOROTHY AMOS PARK - RIVERBANK SOILS
0- TO 1-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - FOR COMPARISON TO METHOD 1 SOIL STANDARD**

**ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

SUMMARY - 0- TO 1-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	4,387	--	--	162.49	--	207.18
Volume Weighted Average:							1.28

Notes:

1. Polygon ID and area are based on information shown on Figures B-1.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.
5. Shaded numbers in bold and italics represent the placement of clean backfill material following the performance of the proposed remediation. The backfill concentration corresponds to the average PCB concentration as presented in the ACO Sites Backfill Data Set.

TABLE B-4
DOROTHY AMOS PARK - RIVERBANK SOILS
1- TO 6-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - FOR COMPARISON TO METHOD 1 SOIL STANDARD

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

1- TO 2-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-4	1	224	1 - 2	0.3	8.30	0.30	2.49
DARB-7	2	165	1 - 2	0.0197	6.11	0.02	0.12
DARB-8	3	78	1 - 2	0.209	2.90	0.21	0.61
DARB-9	4	64	1 - 2	2.02	2.37	2.02	4.80
SB-22	5	22	1 - 2	1.3	0.80	1.30	1.04
SB-23	6	147	1 - 2	2.2	5.46	2.20	12.00
SB-24	7	203	1 - 2	0.0197	7.52	0.02	0.15
SB-25	8	137	1 - 2	0.11	5.08	0.11	0.56
SB-26	9	36	1 - 2	1.1	1.32	1.10	1.46
SB-27	10	47	1 - 2	0.98	1.73	0.98	1.69
SB-28	46, 47	21	1 - 2	0.0197	0.79	0.02	0.02
WB00050LB	12	12	1 - 2	0.035	0.46	0.04	0.02
WB00050LT	13	7	1 - 2	0.03	0.24	0.03	0.01
WB00100LB	14	15	1 - 2	0.03	0.56	0.03	0.02
WB00100LT	15	1	1 - 2	0.025	0.02	0.03	0.00
WB00150LB	16	37	1 - 2	0.8	1.35	0.80	1.08
WB00150LT	17	55	1 - 2	4.8	2.04	4.80	9.79
WB00200LB	18	113	1 - 2	0.05	4.20	0.05	0.21
WB00200LT	19	205	1 - 2	6.7	7.59	6.70	50.83
WB00250LB	20	88	1 - 2	0.09	3.26	0.09	0.29
WB00250LT	21	114	1 - 2	4.7	4.22	4.70	19.86
WB00275LB	22	59	1 - 2	0.03	2.20	0.03	0.07
WB00275LT	23	63	1 - 2	0.0197	2.35	0.02	0.05
WB00300LB	24	48	1 - 2	0.0197	1.78	0.02	0.04
WB00300LT	25	91	1 - 2	0.0197	3.37	0.02	0.07
WB00325LB	26	76	1 - 2	3.3	2.80	3.30	9.25
WB00325LT	27	92	1 - 2	2.4	3.42	2.40	8.20
WB00350LB	28	70	1 - 2	0.0197	2.60	0.02	0.05
WB00350LT	29	104	1 - 2	1.9	3.83	1.90	7.28
WB00375LB	30	86	1 - 2	0.9	3.17	0.90	2.85
WB00375LT	31	87	1 - 2	0.7	3.22	0.70	2.25
WB00400LB	32	117	1 - 2	8.4	4.33	8.40	36.35
WB00400LT	33	204	1 - 2	0.0197	7.54	0.02	0.15
WB00450LB	34	125	1 - 2	0.825	4.65	0.83	3.83
WB00450LT	35	144	1 - 2	6.3	5.34	6.30	33.63
WB00500LB	36	131	1 - 2	0.85	4.85	0.85	4.12
WB00500LT	37	131	1 - 2	0.0197	4.85	0.02	0.10
WB00550LB	38	73	1 - 2	1.3	2.72	1.30	3.53
WB00550LT	39	88	1 - 2	0.0197	3.27	0.02	0.06
WB00600LB	40	62	1 - 2	0.355	2.28	0.36	0.81
WB00600LT	41	102	1 - 2	0.035	3.78	0.04	0.13
WB00650LB	42	161	1 - 2	0.41	5.96	0.41	2.44
WB00650LT	43	183	1 - 2	0.6	6.77	0.60	4.06
WB00700LB	44	125	1 - 2	0.04	4.64	0.04	0.19
WB00700LT	45	174	1 - 2	4.9	6.46	4.90	31.65
Totals:	--	4,387	--	--	162.49	--	258.19
Volume Weighted Average:							1.59

TABLE B-4
DOROTHY AMOS PARK - RIVERBANK SOILS
1- TO 6-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - FOR COMPARISON TO METHOD 1 SOIL STANDARD

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

2- TO 3-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-4	1	224	2 - 3	0.3	8.30	0.30	2.49
DARB-7	2	165	2 - 3	0.0197	6.11	0.02	0.12
DARB-8	3	78	2 - 3	0.209	2.90	0.21	0.61
DARB-9	4	64	2 - 3	2.02	2.37	2.02	4.80
SB-22	5	22	2 - 3	2.75	0.80	2.75	2.20
SB-23	6	147	2 - 3	0.15	5.46	0.15	0.82
SB-24	7	203	2 - 3	1.6	7.52	1.60	12.04
SB-25	8	137	2 - 3	0.13	5.08	0.13	0.66
SB-26	9	36	2 - 3	0.22	1.32	0.22	0.29
SB-27	10	47	2 - 3	0.19	1.73	0.19	0.33
SB-28	46, 47	21	2 - 3	0.27	0.79	0.27	0.21
WB00050LB	12	12	2 - 3	0.035	0.46	0.04	0.02
WB00050LT	13	7	2 - 3	0.03	0.24	0.03	0.01
WB00100LB	14	15	2 - 3	0.03	0.56	0.03	0.02
WB00100LT	15	1	2 - 3	0.025	0.02	0.03	0.00
WB00150LB	16	37	2 - 3	0.8	1.35	0.80	1.08
WB00150LT	17	55	2 - 3	4.8	2.04	4.80	9.79
WB00200LB	18	113	2 - 3	0.05	4.20	0.05	0.21
WB00200LT	19	205	2 - 3	6.7	7.59	6.70	50.83
WB00250LB	20	88	2 - 3	0.09	3.26	0.09	0.29
WB00250LT	21	114	2 - 3	4.7	4.22	4.70	19.86
WB00275LB	22	59	2 - 3	0.03	2.20	0.03	0.07
WB00275LT	23	63	2 - 3	0.0197	2.35	0.02	0.05
WB00300LB	24	48	2 - 3	0.0197	1.78	0.02	0.04
WB00300LT	25	91	2 - 3	0.0197	3.37	0.02	0.07
WB00325LB	26	76	2 - 3	3.3	2.80	3.30	9.25
WB00325LT	27	92	2 - 3	2.4	3.42	2.40	8.20
WB00350LB	28	70	2 - 3	0.0197	2.60	0.02	0.05
WB00350LT	29	104	2 - 3	1.9	3.83	1.90	7.28
WB00375LB	30	86	2 - 3	0.9	3.17	0.90	2.85
WB00375LT	31	87	2 - 3	0.7	3.22	0.70	2.25
WB00400LB	32	117	2 - 3	0.9	4.33	0.90	3.90
WB00400LT	33	204	2 - 3	0.0197	7.54	0.02	0.15
WB00450LB	34	125	2 - 3	0.825	4.65	0.83	3.83
WB00450LT	35	144	2 - 3	6.3	5.34	6.30	33.63
WB00500LB	36	131	2 - 3	0.85	4.85	0.85	4.12
WB00500LT	37	131	2 - 3	0.0197	4.85	0.02	0.10
WB00550LB	38	73	2 - 3	1.3	2.72	1.30	3.53
WB00550LT	39	88	2 - 3	0.0197	3.27	0.02	0.06
WB00600LB	40	62	2 - 3	0.355	2.28	0.36	0.81
WB00600LT	41	102	2 - 3	0.035	3.78	0.04	0.13
WB00650LB	42	161	2 - 3	0.41	5.96	0.41	2.44
WB00650LT	43	183	2 - 3	0.6	6.77	0.60	4.06
WB00700LB	44	125	2 - 3	0.04	4.64	0.04	0.19
WB00700LT	45	174	2 - 3	4.9	6.46	4.90	31.65
Totals:	--	4,387	--	--	162.49	--	225.37
Volume Weighted Average:							1.39

TABLE B-4
DOROTHY AMOS PARK - RIVERBANK SOILS
1- TO 6-FOOT DEPTH INCREMENT (POST-REMEDICATION CONDITIONS) - FOR COMPARISON TO METHOD 1 SOIL STANDARD

ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

3- TO 6-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
DARB-1	23	63	3 - 4	0.77	2.35	0.77	1.81
DARB-2	25	91	3 - 4	0.0197	10.12	7.34	74.26
			4 - 6	11			
DARB-3	24	48	3 - 4	0.35	1.78	0.35	0.62
DARB-5	37	131	3 - 4	0.0197	14.55	1.54	22.40
			4 - 6	2.3			
DARB-6	39	88	3 - 4	1.3	3.27	1.30	4.26
DARB-7	2	165	3 - 4	0.67	6.11	0.67	4.10
DARB-8	3	78	3 - 4	0.7	2.90	0.70	2.03
DARB-9	4	64	3 - 4	6.3	7.12	2.17	15.48
			4 - 6	0.11			
DARB-10	17	55	3 - 4	0.43	2.04	0.43	0.88
DARB-11	19	205	3 - 4	0.25	7.59	0.25	1.90
DARB-12	21	114	3 - 4	0.018	4.22	0.02	0.08
DARB-13	27	92	3 - 4	0.13	3.42	0.13	0.44
DARB-14	26	76	3 - 4	0.605	2.80	0.61	1.69
DARB-15	28	70	3 - 4	0.0197	7.80	0.10	0.78
			4 - 6	0.14			
DARB-16	33	204	3 - 4	0.35	7.54	0.35	2.64
DARB-17	35	144	3 - 4	1.9	5.34	1.90	10.14
DARB-18	45	174	3 - 4	1.5	6.46	1.50	9.69
SB-22	5	22	3 - 4	2.75	0.80	2.75	2.20
SB-23	6	147	3 - 4	0.15	5.46	0.15	0.82
SB-24	7	203	3 - 4	1.6	7.52	1.60	12.04
SB-25	8	137	3 - 4	0.13	5.08	0.13	0.66
SB-26	9	36	3 - 4	0.22	1.32	0.22	0.29
SB-27	10	47	3 - 4	0.19	1.73	0.19	0.33
SB-28	46, 47	21	3 - 4	0.27	0.79	0.27	0.21
Totals:	--	2,476	--	--	118.10	--	169.74
Volume Weighted Average:							1.44

SUMMARY - 1- TO 6-FOOT DEPTH INCREMENT

Sample ID(s)	Polygon ID	Polygon Area (sq. ft.)	Sample Depth (ft.)	PCB Conc. (ppm)	Volume (cumulative) (cy)	Average PCB Concentration Per Foot	Average PCB Conc. TIMES Total Volume
Totals:	--	3,750	--	--	443.08	--	653.30
Volume Weighted Average:							1.47

Notes:

1. Polygon ID and area are based on information shown on Figures B-2.
2. Non-detectable PCBs included as one-half the detection limit in calculations and shown in bold.
3. For instances where a duplicate sample was available, the average of the samples was included in table.
4. All calculations and rounding are performed by the computer software. Therefore, certain quantities in above table are displayed as rounded numbers for table clarity.
5. Shaded numbers in bold and italics represent the placement of clean backfill material following the performance of the proposed remediation. The backfill concentration corresponds to the average PCB concentration as presented in the ACO Sites Backfill Data Set.

S:\P-85-DW-LAF-LAYER-ON-*.OFF-REF*
 G:\VE_ACTIVE\N\20685001\SSSR\ADDENDUM\REPORT\20685008.DWG
 PENTABLE:PLT\FULLCTB PRINTED:10/27/2006 10:55 AM BY:LFORAKER
 PAGESETUP:DL2B-PDF
 LAYOUT:B-1
 PROJECTNAME: 20685X02
 PREFERENCES: 20685X00



NOTES:

1. BASE MAP PREPARED BASED ON SURVEY INFORMATION (8/15/97 AND 9/18, 22/97) BY HILL ENGINEERS, ARCHITECTS AND PLANNERS.
2. ALL EXISTING GE SAMPLING, BORING, AND MONITORING WELL LOCATIONS WERE SURVEYED BY BBL, INC.
3. ONLY THOSE EXISTING SAMPLE LOCATIONS LOCATED IN VICINITY OF RIVER/RIVERBANK AREA ARE SHOWN ON THIS FIGURE.
4. MDEP SAMPLE LOCATION IDs CONSIST OF THE MDEP TRANSECTS SHOWN ON THIS FIGURE, FOLLOWED BY THE LETTERS LT OR LB (DESIGNATING THE LEFT TOP, LEFT BOTTOM OF BANK, RESPECTIVELY, LOOKING DOWNSTREAM).
5. MDEP SAMPLES ON THE RIGHT BANK (LOOKING DOWNSTREAM) HAD PCB CONCENTRATIONS OF 1.4 PPM OR LESS. THEREFORE NO FURTHER DELINEATION WAS REQUIRED AND THE SAMPLES HAVE NOT BEEN SHOWN ON THIS FIGURE.

LEGEND:

- PRIOR GE SOIL BORING LOCATION (PRE-2005)
- MDEP BANK SOIL SAMPLE LOCATION (2000)
- GE BANK SAMPLE LOCATION (2005)
- UTILITY POLE
- CHAIN LINK FENCE
- PROPERTY LINE
- EDGE OF BRUSH
- DECIDUOUS TREE
- HORIZONTAL LIMITS OF REMEDIATION PERFORMED BY GE IN 1998 IN VICINITY OF RIVERBANK (REMOVAL DEPTH VARIES)
- MDEP TRANSECT AND ID
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH
- POLYGON ID
- AREA PROPOSED FOR PCB SOIL REMOVAL



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
WEST BRANCH OF HOUSATONIC RIVER
ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING
SUMMARY REPORT

THEISSEN POLYGON MAP
0- TO 1-FOOT DEPTH INCREMENT
COMPARISON TO METHOD 1 SOIL STANDARD




FIGURE
B-1

S:\R-85-DNW-LAF-LAYER-ON-*.OFF-REF*
 G:\GE_ACTIVE\N\20685001\SSSR\ADDENDUM\REPORT\20685009.DWG
 PENTABLE.PLT\FULLCTB PRINTED:10/27/2006 10:55 AM BY:LFORAKER
 LAYOUT:B-2 PAGESETUP:DL2B-PDF
 PROJECT NAME: 20685X02
 PREFERENCES: 20685X00



NOTES:

1. BASE MAP PREPARED BASED ON SURVEY INFORMATION (8/15/97 AND 9/18, 22/97) BY HILL ENGINEERS, ARCHITECTS AND PLANNERS.
2. ALL EXISTING GE SAMPLING, BORING, AND MONITORING WELL LOCATIONS WERE SURVEYED BY BBL, INC.
3. ONLY THOSE EXISTING SAMPLE LOCATIONS LOCATED IN VICINITY OF RIVER/RIVERBANK AREA ARE SHOWN ON THIS FIGURE.
4. MDEP SAMPLE LOCATION IDs CONSIST OF THE MDEP TRANSECTS SHOWN ON THIS FIGURE, FOLLOWED BY THE LETTERS LT OR LB (DESIGNATING THE LEFT TOP, LEFT BOTTOM OF BANK, RESPECTIVELY, LOOKING DOWNSTREAM).
5. MDEP SAMPLES ON THE RIGHT BANK (LOOKING DOWNSTREAM) HAD PCB CONCENTRATIONS OF 1.4 PPM OR LESS. THEREFORE NO FURTHER DELINEATION WAS REQUIRED AND THE SAMPLES HAVE NOT BEEN SHOWN ON THIS FIGURE.

LEGEND:

- PRIOR GE SOIL BORING LOCATION (PRE-2005)
- MDEP BANK SOIL SAMPLE LOCATION (2000)
- GE BANK SAMPLE LOCATION (2005)
- UTILITY POLE
- CHAIN LINK FENCE
- PROPERTY LINE
- EDGE OF BRUSH
- DECIDUOUS TREE
- HORIZONTAL LIMITS OF REMEDIATION PERFORMED BY GE IN 1998 IN VICINITY OF RIVERBANK (REMOVAL DEPTH VARIES)
- MDEP TRANSECT AND ID
- HORIZONTAL LIMITS OF AREA ASSOCIATED WITH GIVEN SAMPLE, DEVELOPED USING THE THEISSEN POLYGON APPROACH
- POLYGON ID
- AREA PROPOSED FOR PCB SOIL REMOVAL
- 4-FOOT REMOVAL DEPTH



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
WEST BRANCH OF HOUSATONIC RIVER
ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING
SUMMARY REPORT
THEISSEN POLYGON MAP
1- TO 6-FOOT DEPTH INCREMENT
COMPARISON TO METHOD 1 SOIL STANDARD

FIGURE
B-2

Attachment C

Preliminary Surface Water Monitoring Plan

**ATTACHMENT C
PRELIMINARY SURFACE WATER MONITORING PLAN**

**ADDENDUM TO SECOND SUPPLEMENTAL SAMPLING SUMMARY REPORT
FOR THE WEST BRANCH OF THE HOUSATONIC RIVER**

The objective of the proposed water column monitoring activities is to identify, evaluate, and respond to potential water column impacts that may be the result of the sediment removal and replacement activities proposed for the portion of the West Branch of the Housatonic River (West Branch) adjacent to Dorothy Amos Park. The monitoring activities proposed herein for performance prior to and during the sediment removal and replacement activities will use procedures generally consistent with the monitoring programs previously performed for the Building 68 Area Removal Action and the Upper ½ Mile Reach Removal Action, both conducted in the East Branch of the Housatonic River.

Beginning two weeks prior to initiation of sediment removal activities and continuing throughout the sediment removal and restoration activities, surface water samples will be collected on a weekly basis at two locations within the West Branch – one at Transect T00000 (upstream of the remediation area) and one downstream of the West Street Bridge (anticipated to be approximately 50-100 yards downstream of the bridge, with the specific location to be identified in the Remedial Action Work Plan) – for analysis of polychlorinated biphenyls (PCBs) and total suspended solids (TSS). In accordance with GE's FSP/QAPP, water samples of equal volume will be collected at each location from depths approximately equal to 0.2-, 0.5-, and 0.8-times the total water depth at that location, and will be combined into one composite sample for the given location. These sampling data will provide information both on baseline conditions prior to construction and on upstream and downstream PCB and TSS levels during construction, for use in evaluating potential impacts of the remediation work on the water column. The collection and analysis of such weekly water samples will be concluded one week following the completion of construction activities.

In addition to the weekly sampling program described above, the water column will be monitored for turbidity during performance of construction activities at the same two locations within the West Branch – i.e., Transect T00000 (upstream of the remediation area) and downstream of the West Street Bridge. Such monitoring will be initiated shortly before the first intrusive sediment activities are initiated and will continue for the duration of the removal and replacement activities within the West Branch. Continuous turbidity measurements will be made and recorded using a turbidity probe suspended at the approximate mid-depth elevation at each of the upstream and downstream locations, along with a submersible battery-powered data logger (which will record a turbidity reading every 15 minutes).

The turbidity data will be reviewed on a daily basis during construction activities to assess potential water column impacts. A downstream turbidity action level was developed and approved by EPA for the Building 68 Area Removal Action based on an evaluation of a database of “baseline” water column turbidity results, from which an assessment of the water quality conditions (and variations under natural conditions) was performed. This action level was as follows:

$$\text{Turbidity}_{\text{Downstream}} \leq \text{Turbidity}_{\text{Upstream}} + 50 \text{ NTU}.$$

This action level is also proposed for use during the sediment remediation actions within the West Branch.

During sediment removal and restoration activities, evaluations of the turbidity data record will be made at least once per day. In the event that any of the 15-minute readings recorded at the downstream location exceeds the turbidity action level (i.e., the upstream level plus 50 NTU), a number of site assessment activities will be initiated, including, but not limited to, the following:

- Review of the ongoing removal and replacement activities and modification of the condition or performance of the existing erosion and sedimentation control measures;
- Continued monitoring at the downstream location to determine if the prior sampling result was an anomaly or if the elevated reading was possibly a short duration event; and/or
- Collection of additional samples from various locations within or adjacent to the removal area to possibly identify the potential source(s) of the elevated reading.

Additionally, if the downstream turbidity action level is exceeded on a given day, a set of water column samples will be collected at both the upstream and downstream locations for analysis of PCBs and TSS, using the same collection protocol described above for the weekly water column sampling. The resulting data will then be compared to the upstream and downstream turbidity data to assess whether the elevated downstream turbidity reading is also reflected in the PCB and TSS data.

If these assessment activities indicate that the elevated downstream turbidity reading reflects a water quality impact that could persist or recur and that it is related to specific removal and replacement activities or site controls, the pertinent activities will be modified to the extent feasible, or additional controls will be implemented.