GE Corporate

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January 29, 2015

Dean Tagliaferro
EPA Project Coordinator
U.S. Environmental Protection Agency
c/o Weston Solutions, Inc.
One Lyman Street
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site**
**1½-Mile Reach of the Housatonic River (GECD820)**
**2014 Annual Monitoring Report**

Dear Mr. Tagliaferro:

Enclosed is a report describing and presenting the results of the monitoring activities and follow-up response actions performed in 2014 at the 1½-Mile Reach of the Housatonic River in Pittsfield, Massachusetts.

Please call me with any questions.

Sincerely,

Lauren Putnam /for

Kevin G. Mooney
Senior Project Manager –
Environmental Remediation

Enclosure

cc: John Kilborn, EPA (electronic copy)
Chris Ferry, ASRC Primus (electronic copy)
Robert Leitch, USACE (electronic copy)
Scott Campbell, Avatar (2 hard copies + electronic copy)
Karen Pelto, MDEP
Michael Gorski, MDEP (cover letter + CD)
John Ziegler, MDEP (cover letter + CD)
Eva Tor, MDEP (electronic copy of cover letter only)
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**Pittsfield, Massachusetts**

# 2014 Annual Monitoring Report

# 1½-Mile Reach of the Housatonic River

January 2015

ARCADIS

# 2014 Annual Monitoring Report

1½-Mile Reach of the Housatonic River

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General Electric Company

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Our Ref.:
B0031044

Date:
January 2015

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# 1. Introduction

In March 2011, the U.S. Environmental Protection Agency (EPA) issued the *Final Post-Removal Site Control Plan: 1½-Mile Reach Removal Action* (Final PRSC Plan) as part of the *Final Completion Report for the 1½-Mile Reach Removal Action* (Final Completion Report) prepared by Weston on EPA's behalf for the 1½-Mile Reach of the Housatonic River site (1½ Mile). The post-remediation monitoring and maintenance activities for the 1½ Mile are currently performed by the General Electric Company (GE) in accordance with the Final PRSC Plan.

EPA is the lead regulatory agency for all PRSC activities conducted by GE in the 1½ Mile (except for inspections of properties subject to Grants of Environmental Restrictions and Easements [EREs], for which the Massachusetts Department of Environmental Protection [MDEP] is the lead regulatory agency, as discussed below).

The Final PRSC Plan requires GE to submit annual reports summarizing all post-restoration monitoring activities performed for the 1½ Mile during the prior year and describing any corrective actions taken. This report constitutes the annual monitoring report for activities performed in 2014.

## 1.1 Description of 1½ Mile

For the purpose of restoration activities and post-restoration monitoring, the 1½ Mile was divided into four sub-reaches delimited by the four bridge crossings within the 1½ Mile, as shown on Figure 1-1 and listed below:

- Phase 1 – Lyman Street Bridge to Elm Street Bridge
- Phase 2 – Elm Street Bridge to Dawes Avenue Bridge
- Phase 3 – Dawes Avenue Bridge to Pomeroy Avenue Bridge
- Phase 4 – Pomeroy Avenue Bridge to the Confluence of the East and West Branches of the River

Though the sub-reach names listed above reference the construction sequencing, the same nomenclature has been maintained through the monitoring program for consistency.

## 1.2 Purpose and Scope

This *2014 Annual Monitoring Report* has been prepared on GE's behalf by ARCADIS to summarize the results of the monitoring and maintenance activities associated with the 1½ Mile that were performed by GE in 2014. Those activities were conducted in accordance

with the Final PRSC Plan. Specifically, this report describes the 2014 monitoring activities and associated response actions, where conducted, for the following components of the program:

- Restored vegetation;
- Riverbank soil restoration;
- Riprap and articulated concrete block (ACB) installation;
- Select critical ancillary items, including retaining walls;
- Surface water sampling;
- ERE inspection activities; and
- Conditional Solution inspection activities.[1]

A number of trip reports on the specific monitoring and maintenance activities conducted by GE in 2014 were previously submitted to EPA in September (1 report) October (1 report), and December (6 reports) of 2014. In accordance with the Final PRSC Plan, this report summarizes the 2014 inspection/monitoring activities previously described in the trip reports, and it describes the actions (if any) taken in response to conditions noted during the inspections. All field data sheets from the 2014 inspection/monitoring activities are included in Appendix A of this report.

## 2. Restored Vegetation Monitoring

### 2.1 Monitoring Program

The 2012 vegetation inspections constituted the final year of the five-year monitoring period for the riverbank (and, where relevant, non-bank) plantings in the 1½ Mile as required by the Final PRSC Plan. However, based on discussions with EPA, GE proposed in the *2012 Annual Monitoring Report* to continue certain modified monitoring and maintenance activities relating to the vegetation in this reach for three additional years. As approved by EPA, this modified program includes the elements described below.

[1] In addition to these components, the monitoring program specified in the Final PRSC Plan included inspection of the habitat enhancement structures placed in the river. However, in the *2012 Annual Monitoring Report*, GE proposed to discontinue that component of the program, and EPA approved that proposal.

Vegetation Monitoring

The modified vegetation monitoring program, required the performance of one annual monitoring visit (anticipated to occur in July) for three years through 2015, during which GE is to perform a qualitative assessment (through a meander survey) of the condition and/or presence of invasive species cover and tree cages along the banks of the 1½ Mile. No Maintenance Standard is to be applied during these inspections; however, EPA and GE are to discuss potential corrective actions for areas that appear to have a problem (e.g., significant coverage or expansion of invasive species, tree cages adversely affecting tree growth).[2]

In addition, the program required that, during these annual inspections, GE must inspect certain recently planted trees and/or shrubs for a two-year period from the time of the planting. The relevant plantings for 2014 are as follows:[3]

- The six grey dogwoods planted in fall 2012 on the relatively steep bank on Parcel I8-23-6 (in Phase 1) must be inspected in 2013 and 2014. As provided in EPA's March 28, 2013 conditional approval letter, these shrubs are subject to a Maintenance Standard of 80% survival. If the inspections indicate that any of these shrubs need to be replaced, any new plantings are to be subject to a new two-year monitoring period of annual inspections.

- The additional shrubs and trees that were required to be planted on the relatively steep bank on Parcel I8-23-6 (in Phase 1) in spring 2013 (i.e., six New Jersey Teas and three Eastern red cedars) were required to be inspected initially during the 2013 inspection and then again in 2014 and 2015. As provided in EPA's March 28, 2013 conditional approval letter, these shrubs are also subject to a Maintenance Standard of 80% survival. If the inspections indicate that any of these plantings need to be replaced, any new plantings are to be subject to a new two-year monitoring period of annual inspections.

Invasive Species Control Program

In addition to the monitoring visits described above, the additional three-year monitoring and maintenance program required GE to continue its prior reach-wide Invasive Species Control

[2] This specific meander survey requirement is in addition to the reach-wide Invasive Species Control and Tree Cage Maintenance Programs to be implemented in the 1½ Mile Reach, as described below.

[3] Note that this monitoring approach of single annual inspections of new plantings for a two year-period replaced the previous approach of semi-annual inspections of such plantings for a two-year period.

Program. Under that program, starting in the spring and continuing through the fall, the entire 1½ Mile is inspected for invasive species periodically, depending on rainfall and seasonal growth patterns, and treatments of such species are applied as necessary during those inspections.

Tree Cage Maintenance Program

The additional three-year monitoring and maintenance program also required GE to continue a modified version of its reach-wide Tree Cage Maintenance Program. The *2012 Annual Monitoring Report* described the modified program as involving the following elements:

- In Phases 1 and 4 of the 1½ Mile, continued maintenance of existing tree cages and replacement of those cages as necessary, except that the tree cages would be completely removed from the fenced-in upland area behind the building on Parcel I8-24-1 and from Planting Area B at Fred Garner Park, and that any tree cage removed by the property owners would not be replaced;

- In Phases 2 and 3 of the 1½ Mile, continued maintenance of existing tree cages, except that cages found to be in disrepair or too small for a tree or shrub would be removed and not be replaced and any tree cages removed by property owners would not be replaced; and

- No addition of new tree cages in any portion of the 1½ Mile.

However, during 2013, based on the results of the 2013 vegetation inspection and ensuing discussions between GE and EPA regarding the efficacy of various tree cage removal options, GE and EPA agreed on further modifications to the Tree Cage Maintenance Program. That further modified program was summarized in the *2013 Annual Monitoring Report*, and involved a three-year phased approach for the removal of all tree cages from the 1½ Mile, with certain exceptions. The first phase of such program was performed in 2013, and the remaining tree cages subject to removal were to be removed in stages in 2014 and 2015.

Based on the results of the 2014 vegetation inspection and ensuing discussions between GE and EPA, GE and EPA again agreed on further modifications to the Tree Cage Maintenance Program. That further modified program was described in GE's September 5, 2014 trip report on the summer 2014 vegetation inspection (discussed below). This program involves continuation of the three-year phased approach described in the *2013 Annual Monitoring Report* with inclusion of a few clarifications as described in September 2014 trip report. Under this phased approach, tree cage removal activities were to be

focused first on those cages requiring immediate attention, such as those requiring removal because of tree growth or because the cages are downed, damaged, etc. As required by EPA, this modified program includes the following specific requirements and exceptions:

- GE must inspect and maintain all cages on Parcel I7-2-1 in 2014 and 2015, including pruning as necessary. An assessment of the status of the cages will be made during the 2015 summer restored vegetation inspection.

- For the cages on Parcel I7-3-1, GE must limit cage removal to damaged cages and cages affecting tree growth, and must leave all other cages in place. An assessment of the status of the cages will be made during the 2015 summer restored vegetation inspection.

- GE must inspect and maintain the tree cages between the footpath and the river at Fred Garner Park in 2014 and 2015, including pruning as necessary. An assessment of the status of the cages will be made during the summer 2015 restored vegetation inspection.

- The cages on Parcels I8-24-1 and I8-24-101, GE must limit removal to damaged cages affecting tree growth, and must leave all other cages in place. An assessment of the status of the cages will be made during the 2015 summer restored vegetation inspection.

- GE shall focus cage removal activities on the riverbanks between the Elm Street Bridge and Pomeroy Avenue Bridge (excluding Parcels I7-2-1 and I7-3-1) through 2014, especially after the first frost. In other areas, GE will continue to focus on removal of damaged cages and cages affecting tree growth.

Herbivore Control Measures

As directed by EPA in its March 28, 2013 conditional approval letter, the additional three-year monitoring and maintenance program also required GE, in consultation with EPA, to continue through 2015 to conduct herbivore control measures if necessary to ensure the natural growth of vegetation.

### 2.2 2014 Monitoring Activities

Vegetation monitoring activities performed in 2014 comprised the second year of the scheduled three-year program detailed in the *2012 Annual Monitoring Report*. The inspection was performed on August 5, 2014, and was attended by representatives of GE and EPA. This inspection was described and the results presented in a trip report submitted

to EPA on September 5, 2014. The vegetation-related monitoring activities conducted in 2014 are summarized below.

The inspection of the six grey dogwoods planted in the fall of 2012 on the steep bank on Parcel I8-23-6 and the additional shrubs and trees (six new Jersey Teas and 3 eastern red cedars) planted in the spring of 2013 on that steep bank indicated that all of these specimens were healthy and surviving and that thus the applicable 80% Maintenance Standard was met.

The results of the inspection also indicated that the Invasive Species Control Program had continued and continues to be successful along the 1½ Mile and that no adjustments to that program were necessary.

Additionally, it was noted during the 2014 inspection that the modified Tree Cage Maintenance Program outlined in the *2012 Annual Monitoring Report* had continued. However, as discussed above, based on the inspection results and subsequent discussions in 2014, GE and EPA agreed on further modifications to the Tree Cage Maintenance Program, described in Section 2.1. In accordance with the modified approach, the phased tree cage removal program was observed to be proceeding as planned and will continue subject to the few clarifications described above, with particular attention paid to cages requiring immediate attention, such as those requiring removal because of tree growth or because the cages are downed, damaged, etc..

Herbivore control measures were conducted in December of 2014 due to extensive tree damage between the Lyman Street and Elm Street bridges. One beaver was trapped. After the trapping was completed, no further tree damage was observed.

### 2.3 Response Actions

No response actions were required in 2014 (other than removal of tree cages and herbivore control measures, as described above), as the restored vegetation met the Maintenance Standard set forth in the *2012 Annual Monitoring Report*.

## 3. Restored Riverbank Soil Monitoring

### 3.1 Monitoring Program

The Final PRSC Plan required that the post-restoration riverbank soil monitoring program consist of a visual inspection of the riverbanks, through walking the length of the banks, to assess general characteristics of the riverbanks and to identify potential bank erosion on an annual basis during the first five years after restoration. The Maintenance Standard for the

riverbank soil restoration is "no significant erosion (e.g., ruts, gullies, washouts, or sloughing)" (Final PRSC Plan, p. 2-1). 2012 was the fifth year of the restored riverbank soil monitoring program. Based on discussions with EPA, GE proposed in the *2012 Annual Monitoring Report* to continue performance of the annual inspections for an additional three years. EPA's approved that proposal in its March 28, 2013 conditional approval letter for GE's *2012 Annual Monitoring Report*. At the end of the three-year period (i.e., 2015), GE is to make a proposal regarding further long-term monitoring of the restored riverbank soil, as discussed in Section 8.2.

### 3.2 2014 Monitoring Activities

The riverbank soil restoration monitoring visit was conducted on September 16, 2014, and constituted the second year of the scheduled additional three-year monitoring program detailed in the *2012 Annual Monitoring Report*. Representatives of GE conducted the inspection with EPA oversight, and the results were presented in a trip report submitted to EPA on October 8, 2014.

During the 2014 bank inspection, flow in the River was approximately 31 cubic feet per second (cfs), as measured at U.S. Geological Survey (USGS) River Gage Station No. 01197000 on the East Branch of the Housatonic River in Coltsville, MA. The areas that were monitored during the 2014 riverbank soil restoration monitoring inspection, which correspond to the four phases of the 1½ Mile Removal Action (described above), are illustrated on Figures 3-1 through 3-4.

During the 2014 inspection, no areas within the remediated and restored areas were noted with significant erosion, and therefore all areas met the Maintenance Standard. The completed field form documenting the September 2014 restored riverbank soil monitoring event is included in Appendix A.

An area of minor erosion was observed in an unremediated area near the top of the bank on Parcel I9-4-201, as illustrated on Figure 3-1. Since this area was not remediated as part of the 1½-Mile Reach Removal Action, it is not subject to any Maintenance Standard; but it was noted in the October 8, 2014 trip report at EPA's request and is likewise noted herein. At EPA's direction, that area will be monitored again in 2015, as discussed in Section 8.2.

### 3.3 Response Actions

No response actions were required in 2014, as the restored riverbank soil met the Maintenance Standard set forth in the Final PRSC Plan.

# 4. Riprap and ACB Monitoring

## 4.1 Monitoring Program

The Final PRSC Plan required that the post-restoration monitoring program for the riprap and articulated concrete block (ACB) consist of visual inspections of all riprap located within the 1½ Mile to observe the general condition of the riprap and underlying banks, including noting any indications of sloughing, erosion, and/or movement of associated riprap. The Maintenance Standards for riprap within the river channel, riverbank, and swales are that there be "no significant movement of the riprap or reduction in riprap thickness that threatens the stability of the riverbanks or river channel or results in the erosion of underlying soils or sediment," and for riprap placed in swales, that there be "no movement of riprap that results in the exposure of the underlying geotextile fabric" (Final PRSC Plan, p. 2-2).

The monitoring program has also included visual observations of the riverbed ACB located immediately downstream of the Elm Street Bridge to assess the general condition of the ACB (and surrounding transition areas) and to monitor for any cracked or loose blocks and/or any other potential structural deficiencies that may adversely impact the long-term performance of the ACB. For ACB areas in the river channel, the Maintenance Standard is that there be "no significant damage to (i) the ACB, (ii) the shotcrete that is tying in the ACB to the base of the adjacent retaining wall on Parcel I8-10-5, and (iii) the shotcrete at the transition between the ACB and the adjacent riprap at the downstream end of the ACB" (Final PRSC Plan, p. 2-2).

2012 was the fifth year of the monitoring program for the riprap and ACB. Based on discussions with EPA, GE proposed in the *2012 Annual Monitoring Report* to continue performance of the annual inspections of the riprap and ACB for an additional three years. EPA's approved that proposal in its March 28, 2013 conditional approval letter for GE's *2012 Annual Monitoring Report*. At the end of the three-year period (i.e., 2015), GE is to make a proposal regarding further long-term monitoring of the riprap and ACB, as discussed in Section 8.3.

## 4.2 2014 Monitoring Activities

The monitoring activities for the riprap installed in the 1½ Mile and the ACB areas were performed concurrently with the riverbank soil restoration monitoring on September 16, 2014, by representatives of GE with EPA oversight.

The riprap and ACB monitoring performed in 2014 consisted of visual observation of the condition of all the riprap installed in the 1½ Mile and of the ACB areas. As noted in Section 3, at the time of the September 16 inspection, flow in the River was approximately 31 cfs at

the Coltsville gage. The results of the 2014 inspection were presented in GE's October 8, 2014 trip report.

### 4.2.1 Riprap Layer

The 2014 inspection indicated that the riprap met the Maintenance Standards set forth in the Final PRSC Plan. There were no observations of sloughing, erosion, or degradation of the riprap; there were no bare areas or other indications of material loss; and there was no other evidence of significant movement of the riprap or reductions in riprap thickness affecting the stability of the riverbanks or river channel or resulting in erosion of the underlying soils or sediment. The same field form used for the previously discussed restoration components was used to document the riprap layer monitoring for the 2014 inspection; that form is included in Appendix A.

The 2014 inspection included a visual assessment of an area where some potential minor movement of riprap was observed in 2013. As illustrated on Figure 3-2, this area is located in an area of the EPA-installed swale on the City Layout for High Street parcel that is near the outfall pipe draining from the City catch basin that was repaired by GE in 2011. During the September 16 monitoring event, it did not appear that any significant movement of riprap occurred during the period of time between the 2013 and 2014 inspections.

### 4.2.2 ACB

During the 2014 inspection, there was no evidence of damage to the observed ACB or the associated shotcrete that transitions between the observed ACB and the base on the adjacent retaining wall on Parcel I8-10-5. The ACB at the base of the retaining wall appeared stable and without evidence of movement, joint separation, or degradation of materials. Further, at the transition between the ACB in the channel and the adjacent riverbed riprap immediately downstream of the terminus of the ACB, no areas of instability or cracking were observed, and the shotcrete present appeared to be stable and performing as intended. Thus, the ACB observed met the applicable Maintenance Standards.

As required by EPA's October 7, 2013 conditional approval letter, GE measured and photo-documented the gap between the shotcrete and ACB at the base of the retaining wall along the entire length of the wall for comparison to the baseline measurements presented in the 2012 inspection report. The 2014 measurements are provided in Table 3-1. In general, the measurements indicate that the vertical distance between the bottom of the shotcrete and the top of the underlying ACB was approximately three inches or less for most of the length of the retaining wall, and has not appreciably changed since the initial measurements collected in 2012. In addition, the horizontal space in the gap was generally two to five inches deep before solid shotcrete was encountered. At the downstream end of the retaining wall, the vertical gap and horizontal space underneath the shotcrete were

somewhat larger than observations made in 2012, as described in Table 3-1, but, again, not appreciably different.

Similar to observations made during the 2013 inspection, it was noted during the 2014 inspection that there was no discernible change or difference (in size or character) in the areas of void space that were first observed in 2010 between the shotcrete and the ACB at the base of the retaining wall, indicating that there was no apparent material loss associated with these void spaces.

The same field form used for the previously discussed restoration components was used to document the ACB monitoring for the July 31 inspection; that form is included in Appendix A.

### 4.3 Response Actions

No response actions were required in 2014, as the riprap layer and the observed ACB met the Maintenance Standards set forth in the Final PRSC Plan. However, similar to observations made in 2013, it was noted during the 2014 inspection that a willow tree was growing in the ACB on the east bank located immediately downstream of the Elm Street Bridge.

## 5. Select Critical Ancillary Item Monitoring

### 5.1 Monitoring Program

The Final PRSC Plan required GE to visually inspect the critical ancillary items to confirm the presence and general condition of each item in relation to its as-built condition and to assess the need for corrective action. The critical restoration items identified in the Final PRSC Plan are: (1) the retaining walls adjacent to Parcels I8-23-6, I8-24-1, I8-10-5, and I8-10-4, and the City Layout for High Street; (2) fencing along the retaining walls at Parcels I8-10-5 and I8-10-4, and the City Layout for High Street; (3) handrails on the Silver Lake outfall structure; (4) guardrails along High Street and Deming Street; and (5) fencing along Caledonia Street. Additionally, the above-mentioned retaining walls were required to be visually inspected and reviewed for stability and functionality. The Maintenance Standard for all the critical restoration items is “no substantial variation from as-built conditions” (Final PRSC Plan, p. 2-3).

Based on discussions with EPA, GE proposed in the *2012 Annual Monitoring Report* to continue performance of the annual inspections for certain of the critical ancillary items for an additional three years – namely, the five retaining walls specified in the Final PRSC Plan, the fencing on top of the retaining wall adjacent to the City Layout for High Street, and the fencing along Caledonia Street. In its March 28, 2013 conditional approval letter for GE’s

*2012 Annual Monitoring Report*, EPA required that, during those three additional annual inspections, GE also continue inspections of the fencing on top of the retaining walls on Parcels I8-10-4 and I8-10-5. At the end of the three-year period (i.e., 2015), GE is to make a proposal regarding further long-term monitoring of these remaining select critical ancillary items, as discussed in Section 8.4.

In addition, the Final PRSC Plan also required that, at least every five years, "a registered professional structural or geotechnical engineer experienced in the design and construction of the specific features" must perform the inspection of the critical ancillary items. This engineer must review the in-river and out-of-river construction as-built drawings included in the Final Completion Report, as well as the previous monitoring reports, prior to performing the inspections. At EPA's request, the first set of such inspections by a registered professional engineer was advanced to 2011 and performed in that year. A report on those inspections was submitted to EPA on August 31, 2011, and summarized in the *2011 Annual Monitoring Report* for the 1½ Mile.

### 5.2 2014 Monitoring Activities

The 2014 inspection of the critical ancillary items listed above was performed on September 16, 2014 by representatives of GE, with EPA oversight, in conjunction with the riverbank soil restoration monitoring. This inspection comprised the second year of the scheduled additional three-year monitoring program for the select critical ancillary items listed above. The results of this monitoring event were included in the October 8, 2014 trip report.

The 2014 monitoring visit included inspections of all five retaining walls specified in the Final PRSC Plan. The approximate locations of these retaining walls are illustrated on Figures 3-1 and 3-2. As described in the October 8, 2014 trip report, the physical features of these walls and the associated top-of-bank features behind the walls were generally observed to be in good condition, and there were no observations of defects (including soil displacement, settlement, sloughing/slumping, pronounced drop in surface elevation, or excessively leaning fences, trees, utility poles, or fences). As such, the retaining walls met the Maintenance Standard defined in the Final PRSC Plan.

With respect to the remaining select critical ancillary items, the 2014 inspection indicated that, in general, the fencing along the retaining walls at Parcels I8-10-5 and I8-10-4 and the City Layout for High Street, and the fencing along Caledonia Street adjacent to the former Parcel I8-10-1 were in good condition, with no substantial variation from the as-built conditions, and thus met the Maintenance Standard specified in the Final PRSC Plan.

The completed field inspection forms documenting the observations of the critical ancillary items made during the September 18, 2014 inspection are included in Appendix A.

### 5.3 Response Actions

No response actions were required in 2014, as the select critical ancillary items met the Maintenance Standard set forth in the Final PRSC Plan.

## 6. Surface Water Sampling

### 6.1 Monitoring Program

Specific to the 1½ Mile, under the Housatonic River Monthly Water Column Sampling Program, monthly water quality samples are collected at the Lyman Street and Pomeroy Avenue Bridge locations and analyzed for polychlorinated biphenyls (PCBs), total suspended solids (TSS), and other conventional parameters. Field data such as temperature, conductivity, and pH are also collected for each event. In addition, for each event, the flow in the river is reported from data collected at the USGS flow gage in Coltsville, MA. Precipitation data are also compiled from daily National Oceanic and Atmospheric Administration's National Weather Service (NOAA/NWS) data reported for the Pittsfield, MA airport.

### 6.2 2014 Monitoring Activities

During 2014, 12 monthly surface water monitoring events were conducted. The results associated with the 2014 surface water monitoring at the Lyman Street and Pomeroy Avenue locations are summarized in Table 6-1. The data in Table 6-1 has been validated in accordance with GE's 2013 Field Sampling Plan/Quality Assurance Project Plan, and an associated data validation report is included in Appendix B.

At the Lyman Street Bridge station (Location #4), PCBs ranged from non-detect (ND) to 0.219 parts per billion (ppb). At the Pomeroy Avenue Bridge station (Location #6A), PCBs ranged from ND to 0.027 ppb.

TSS results across the entire water column data set ranged from not detected to 30 parts per million.

## 7. Inspections of Properties Subject to Grants of Environmental Restrictions and Easements (EREs) or to Conditional Solutions, and Other Notifications

In accordance with the Consent Decree (CD) for the GE-Pittsfield/Housatonic River, EREs have been executed and recorded at a number of properties in the 1½ Mile. At other properties within that reach, Conditional Solutions have been implemented in accordance with the provisions of the CD. The CD and the Final PRSC Plan require GE to conduct

annual inspections of such properties that are not owned by GE or the Commonwealth of Massachusetts. The Final PRSC Plan also requires GE to make certain other notifications, as discussed in Section 7.3.

## 7.1 Monitoring Program

### 7.1.1 ERE Inspections

For non-residential properties in the 1½ Mile that are owned by parties other than GE or the Commonwealth of Massachusetts and at which EREs have been recorded, annual inspections regarding compliance with the EREs are required in accordance with the requirements of Appendix Q to the CD as well as the Final PRSC Plan. EREs have been executed and recorded in the Berkshire Middle District Registry of Deeds for the following such properties located wholly or partly within the 1½ Mile: (a) one privately owned property – Parcel I7-21-1 (ERE recorded on April 1, 2009); (b) two properties owned by the City of Pittsfield that are located partly within the 1½ Mile and partly within the non-residential floodplain properties adjacent to the 1½ Mile – Parcels I8-4-7 and I7-1-101 (Fred Garner Park) (EREs recorded on September 16 and December 23, 2009, respectively); and (c) six additional City-owned parcels within the 1½ Mile – Parcels I8-4-8, I7-21-5, I8-10-102, and I7-20-1, -2, & -101 (EREs recorded on April 22, 2010).

Under the applicable requirements, the annual ERE inspection of these properties is to consist of two components. The first component is to consist of a review of several documents (as applicable) – namely: (i) the ERE itself, (ii) the associated survey plan, (iii) the Final Completion Report (FCR), (iv) the relevant as-built survey drawings (and any alternative, more recent plan that GE proposes to use for evaluation of surface grade changes), (v) any conditional exceptions approved under the ERE (if known), (vi) any recorded amendments to and/or releases from the ERE, and (vii) any Post-Work Notification Forms (Exhibit E or F to the ERE, depending on the ERE) available to GE. The second component is to consist of a visual inspection of the property to determine whether there is visual evidence that any of the following has occurred since the last inspection:

- Activities at or uses of the property that are potentially contrary to the restrictions stated in the ERE;
- Utility work or any building construction, modification, addition, and/or demolition;
- Soil excavations that involved more than 10 cubic yards of soil;
- Significant soil erosion; and/or
- Significant pavement construction, disturbance, and/or removal/excavation.

It should be noted that, unlike all other Post-Removal Site Control activities subject to the Final PRSC Plan, the lead regulatory agency for activities relating to these ERE inspections is MDEP, rather than EPA, as MDEP is the Grantee of the EREs.

### 7.1.2 Conditional Solution Inspections

For non-GE-owned properties at which Conditional Solutions have been implemented, annual inspections are required in accordance with Paragraph 36 and 38 and Appendix Q of the CD, as well as the Final PRSC Plan. Conditional Solutions have been implemented at the following properties within the 1½ Mile: Parcels I7-21-2 and I7-21-103 (riverbank portions only), which are commonly owned; Parcel I8-24-1 (riverbank portion only); Parcel I8-23-103 (riverbank portion only); Parcel I8-23-4 (riverbank portion only); a riverbank property abutting Deming Street, Elm Street Bridge, East Branch of the Housatonic River, and Parcel I8-4-8 (referred to hereafter as property abutting Deming Street); and the riverbank property within a portion of the City Layout for High Street.[4] GE sent letters to the owners of these properties, except for the last two, on December 18, 2008, notifying them of the implementation of the Conditional Solutions at their properties. For the last two above-listed properties, whose ownership is not clear, GE sent letters to the City of Pittsfield, as the likely holder of an interest in the properties, on April 1, 2009 and September 1, 2009, notifying the City of the Conditional Solutions. Following a change in ownership in two of the properties in 2012 (Parcel I8-24-1 and Parcel I8-23-103), GE sent letters to the new owners of Parcel I8-24-1 on June 19, 2012, and to the new owner of Parcel I8-23-103 on July 18, 2012, notifying them of the Conditional Solutions for their properties.

Under the applicable requirements, the annual inspections of properties with Conditional Solutions are to consist of a document review and a visual on-site inspection. Prior to the on-site inspection activities, GE is to review the most recent property records from the Pittsfield Tax Assessor's Office, as well as the deed records at the Berkshire Middle District Registry of Deeds, where such records exist for the properties in question, to determine if there has been a change in ownership. If there has been such a change in ownership, GE is to notify the new owner of the Conditional Solution. In addition, GE is to review the FCR, including the description of the Conditional Solutions for these properties and the relevant as-built survey drawings which depict site features and topography, and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the CD.

[4] In addition to these properties, there are a number of properties at which the riverbank portions are situated within the 1½ Mile and the non-riverbank portions are located within other Removal Action Areas (RAAs) and at which Conditional Solutions were previously implemented in connection with those other RAAs. These properties, and the Conditional Solution inspections performed for them in 2014, are discussed in Section 7.2.2 below.

The visual site inspection of each of these properties is to evaluate whether any of the following has occurred since last inspection:

- Any change in activities or uses of the property that would be potentially inconsistent with the land use for which the Conditional Solution was implemented;

- Installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil; or

- Any excavations, construction, or other activities or conditions that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth.

If any of the activities noted in the last two above bullets appears to have altered the surface grade of the property, compared to that shown in the as-built survey drawings included in the FCR (or any more recent plan that GE proposes and EPA approves), GE is required to identify the approximate location of such change on a plan and compare it to the surface grade in the above listed-drawings (or plan).

## 7.2 2014 Monitoring Activities

### 7.2.1 ERE Inspections

GE conducted the annual ERE inspections of the properties listed in Section 7.1.1 on November 18, 2014. These consisted of the sixth annual ERE inspection of Parcels I7-21-1 and I8-4-7 and the fifth annual ERE inspection of Parcels I7-1-101, I8-4-8, I7-21-5, I8-10-102, I7-20-1, -2, and -101.[5]

The ERE inspections included, for each property, a review of the documents pertinent to the ERE and the use of the property and a visual inspection of the property to evaluate whether there was any evidence that any of the activities or conditions listed in Section 7.1.1 had occurred since the prior ERE inspection in November 2013. For each of these properties, no new ERE-related documentation had been generated since the last inspection, and hence GE reviewed the existing documentation (e.g., ERE, Plan of Restricted Area, and the FCR, including the relevant as-built survey drawings therein). Additionally, for each property, the visual inspections conducted on November 1, 2014 revealed no significant changes in the physical condition of the property and no evidence of any of the other above-listed conditions since the last inspection. The results of these inspections were

[5] The ERE inspections of Parcels I8-4-7 and I7-1-101 were conducted jointly for both the riverbank portions within the 1½ Mile and the non-riverbank portions within the non-residential floodplain properties adjacent to the 1½ Mile.

documented in the ERE Annual Inspection Checklists for these properties, copies of which are included in Appendix A, and in inspection reports submitted to EPA and MDEP on December 17, 2013.[6]

### 7.2.2 Conditional Solution Inspections

GE conducted the sixth annual Conditional Solution inspections of the properties listed in Section 7.1.2 on November 18, 2014, in accordance with the requirements described in that section. The property record review indicated that, since the prior Conditional Solution inspection in November 2013, there had been no change in ownership of the properties with available property records (i.e., excluding the property abutting Deming Street and the City Layout for High Street, for which records are not available and thus this information could not be confirmed). Additionally, the inspections showed no visual evidence of any of the activities or conditions listed in Section 7.1.2 at these properties since that prior inspection. The results of these inspections were documented in the Conditional Solution Annual Inspection Checklists for these properties, copies of which are included in Appendix A, and in an inspection report submitted to EPA and MDEP on December 17, 2014.

In addition to these inspections, Conditional Solution inspections were conducted in November 2014 at a number of properties at which the riverbank portions are situated within the 1½ Mile and the non-riverbank portions are located within other Removal Action Areas (RAAs), and at which Conditional Solutions were previously implemented in connection with those other RAAs. Specifically, this is the case for Parcels I9-4-14 and I9-4-19 (which are commonly owned), I9-4-201, I9-4-203, and I9-4-25/-202 at the Lyman Street Area; Parcel I8-23-6 at Former Oxbow Areas A and C; and Parcel I7-1-5 at the floodplain non-residential properties adjacent to 1½ Mile. At these properties, the riverbanks were inspected in November 2014 in conjunction with the non-riverbank portions. The results of these inspections were provided in separate inspection reports submitted to EPA and MDEP in accordance with the Post-Removal Site Control requirements for those non-riverbank RAAs.

As documented in these forms and noted above, the property record reviews indicated that there had been a change in the ownership of Parcel I9-4-201, but no change in the ownership of any of the other Conditional Solution properties since the last property records review in 2013. Specifically, GE learned that in November 2013 Phillip E. Massery conveyed title to Parcel I9-4-201 to the Phillip E. Massery Family Irrevocable Trust (Michael

[6] Separate letter reports were submitted for the parcels located within the 1½ Mile (Parcels I7-21-1, I8-4-8, I7-21-5, I8-10-102, and I7-20-1, -2, & -101) and for the parcels located partly within the 1½ Mile and partly within the non-residential floodplain properties adjacent to the 1½ Mile (Parcels I8-4-7 and I7-1-101).

P. Massery and Michelle R. Massery, Natural Resource Trustees [Trustees]). After becoming aware of this transfer, GE sent a Conditional Solution notification letter to this Trust on December 15, 2014. Additionally, as stated in the *2013 Annual Monitoring Report*, a portion of Parcel I8-23-6 became subject to a long-term lease in November 2013. Although no change in ownership occurred, GE sent a letter to the lessee on January 17, 2014, providing notice of the Conditional Solution on the property.

The 2014 inspections showed no visual evidence of any of the activities or conditions listed in Section 7.1.2 at these properties since the prior inspection in November 2013. Copies of the Conditional Solution Annual Inspection Checklists for these properties are included in Appendix A.

### 7.3 Other Notifications

In addition to the above-described requirements, the Final PRSC Plan contains certain other notification requirements. First, it requires GE to perform an annual search regarding the ownership of the properties on which the retaining walls discussed in Section 5 were built – namely, Parcels I8-10-4, I8-10-5, I8-23-6, I8-24-1, and the City Layout for High Street. It provides that if there has been a change in ownership of any of these properties, GE must send to the new owner a copy of the letter that EPA previously sent to the owner of the property describing the retaining wall on the property and advising the owner not to interfere with or modify that wall.

Based on review of the property records, GE has determined that there has been no change in ownership of any of these properties since the prior record review in late 2013 However, as noted above, GE has learned that the commercial portion of Parcel I8-23-6, including the riverbank, was leased to a new entity under a long-term lease executed in November 2013. Accordingly, in its January 17, 2014 letter to that lessee regarding the Conditional Solution at Parcel I8-23-6 (as noted above), GE included a copy of EPA's prior letter regarding the retaining wall on the riverbank at that property.

The Final PRSC Plan also requires GE to send an annual letter to the Pittsfield Conservation Commission (PCC), reminding the PCC that EPA has provided it with a comprehensive Registry of properties that are located within the 100-year floodplain adjacent to the East Branch of the Housatonic River and are subject to the CD, recommending that if a Notice of Intent is submitted to the PCC for a property listed in that Registry, the PCC should contact EPA and MDEP, and requesting that the PCC maintain that Registry. EPA sent an updated Registry of such properties to the PCC on September 29, 2014; and GE sent the required annual reminder letter to the PCC on December 2, 2014.

# 8. Future Activities

Based on discussions with EPA, GE has developed a scope of proposed monitoring and maintenance activities for the 1½ Mile going forward. A summary of the proposed future monitoring events for the various monitoring programs is provided in Table 8-1 and further described below. GE will coordinate scheduling of the monitoring visits with EPA to avoid potential high-water events in the 1½ Mile (where relevant) or other scheduling conflicts. Once the scheduling has been coordinated with EPA, GE will provide the MDEP and the Trustees' representative with sufficient notice of the date of upcoming inspections.

## 8.1 Restored Vegetation Monitoring

The next annual vegetation inspection is anticipated to be performed in July 2015. During that inspection GE will perform a qualitative assessment (through a meander survey) of the condition and/or presence of invasive species cover along the banks of the 1½ Mile, and will also inspect the six New Jersey Teas and three Eastern red cedars planted in the spring of 2013 on the relatively steep bank on Parcel I8-23-6.[7]

In addition, GE will continue the current reach-wide Invasive Species Control Program (described in Section 2.1) and the latest modified version of the Tree Cage Maintenance Program (also described in Section 2.1) for one more year (i.e., through 2015). It will also continue during that period with the implementation of herbivore control measures if necessary.

Following completion of the 2015 inspection, GE will make a proposal to EPA regarding the need for and scope of any future monitoring and maintenance activities for the restored vegetation in the 1½ Mile. Similarly, at the end of 2015, GE will make a proposal to EPA regarding the need for continuing the Invasive Species Control Program and the modified Tree Cage Maintenance Program.

## 8.2 Riverbank Soil Restoration Monitoring

Restored bank erosion monitoring program will be conducted one more year (i.e., through 2015), either in late spring or summer during low flow conditions, as well as after any flow events exceeding 3,500 cfs at the Coltsville gage during this period.

Following the scheduled 2015 inspection, GE will make a proposal regarding further long-term monitoring of the restored riverbank soil.

[7] The required inspections of the six shrubs (grey dogwoods) planted in fall 2012 on the relatively steep bank on Parcel I8-23-6 was completed with the 2014 inspection.

### 8.3 Riprap Layer and ACB Monitoring

Monitoring of the riprap layer and ACB will be conducted one more year (i.e., through 2015). To the extent feasible, the inspection will be performed at the same time as the inspections of the restored riverbank soil (described in Section 8.2) – i.e., in late spring or summer during low flow conditions. GE will attempt to schedule the inspection at a time when the river flow is sufficiently low that observations can be made of the interface between the shotcrete and the ACB at the base of the retaining wall at Parcel I8-10-5, which will also facilitate the inspection of the transition between the ACB in the channel and the adjacent riverbed riprap immediately downstream of the terminus of the ACB. However, if the flow is not sufficiently low at the time of restored riverbank soil inspection, the inspection of the riprap layer and ACB may be performed at a later time, or a supplemental inspection will be conducted of the ACB at the base of the retaining wall when the requisite flow condition is met. In addition, inspections of the riprap and ACB will be conducted after any flow events during this three-year period that exceed 3,500 cfs at the Coltsville gage.

During the 2015 inspection, GE will monitor the area near the top of bank located on Parcel I9-4-201 (Figure 3-1). This area will be monitored to observe whether any additional or more significant erosion has occurred during the period of time between inspections.

During the 2015 inspection GE will also measure and photo-document the gap between the shotcrete and ACB in the southern end of the shotcrete wall, and will present such measurements in the trip reports on these items, along with a comparison of those measurements to the baseline measurements. Following the scheduled 2015 inspection(s), GE will make a proposal regarding further long-term monitoring of the riprap and the ACB.

### 8.4 Select Critical Ancillary Items Monitoring

Monitoring of select critical ancillary items will be conducted one more year (i.e., through 2015) for the five retaining walls specified in the Final PRSC Plan, the fencing on top of the retaining walls at Parcels I8-10-5 and I8-10-4 and the City Layout for High Street, and the fencing along Caledonia Street. The inspection will be performed at the same time as the inspections of the restored riverbank soil in late spring or summer during low flow conditions or, if the riprap/ACB inspection is performed at a later time (as discussed in Section 8.3), concurrently with that inspection.[8]

[8] Similarly, if a supplemental inspection is conducted of the ACB at the base of the retaining wall on Parcel I8-10-5 during lower flow conditions, as also discussed in Section 8.3, the interface between that retaining wall and the adjacent ACB will be observed during that supplemental inspection.

Following the 2015 inspection, GE will make a proposal regarding further long-term monitoring of these critical ancillary items.

A professional engineer will perform another inspection of the five retaining walls in 2016. Following that inspection and the engineer's report on it, GE will make a proposal regarding the continuation of this inspection program for the retaining walls.

### 8.5 Surface Water Sampling

Surface water sampling associated with the 1½ Mile will continue to be performed monthly at the Lyman Street Bridge and Pomeroy Avenue Bridge locations as part of the ongoing water column sampling efforts being performed under the Housatonic River Monthly Water Column Sampling Program. This sampling will continue for as long as GE continues that Water Column Sampling Program.

### 8.6 Sediment Sampling

An additional sediment sampling event (third round) will be performed in 2017, likely in late June or early July. Prior to that event, GE will submit to EPA for approval a sampling plan for the collection and analysis of these samples. Following the completion of that event, GE will submit a proposal to EPA regarding the need for and scope of further long-term monitoring of the sediments in the 1½ Mile.

### 8.7 Macroinvertabrate Sampling

An additional macroinvertebrate sampling event (third round) will be performed in 2017, likely in late June or early July. Prior to that event, GE will submit to EPA for approval a sampling plan for the collection and analysis of the macroinvertebrate samples. Following the completion of that event, GE will submit a proposal to EPA regarding the need for and scope of further long-term monitoring of macroinvertebrates in the 1½ Mile.

### 8.8 ERE and Conditional Solution Inspections

GE will continue to perform inspections of the non-GE-owned and non-State-owned properties subject to EREs and the properties subject to Conditional Solutions within the 1½ Mile on an annual basis in the late fall (typically November), with the next inspections anticipated for November 2015. For properties where the ERE or Conditional Solution applies only to the riverbank portion of the property, the inspections will be conducted only of that portion. For properties where the ERE or Conditional Solution applies to both the riverbank and non-riverbank portions, the inspections of the riverbanks within the 1½ Mile will be conducted in conjunction with the ERE or Conditional Solution inspections of the

non-riverbank portions as required under Post-Removal Site Control Plans for other RAAs under the CD.

### 8.9 Future Reporting

In accordance with the Final PRSC Plan, GE will continue to include the results from the monitoring activities conducted during a given year in an annual report to be submitted to EPA. In addition, interim reports on the monitoring events described above will be submitted after completion of the inspection(s) in question.

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**Tables**

**TABLE 3-1**
**SUMMARY OF MEASUREMENTS OF THE GAP BETWEEN THE SHOTCRETE AND ACB ADJACENT TO I8-10-5**

**2014 ANNUAL MONITORING REPORT**
**1 1/2-MILE REACH OF THE HOUSATONIC RIVER**
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

| Measurement Location[1] | 2012 Measurement[2] (inches) | 2014 Measurement[2] (inches) | 2014 Comments |
|---|---|---|---|
| 1 | 0 | 0 | No gap observed. |
| 2 | NA | 0 | No gap observed. |
| 3 | 0 | 0 | No gap observed. |
| 4 | NA | 0 | No gap observed. |
| 5 | 0 | 0 | No gap observed. |
| 6 | NA | 0 | No gap observed. |
| 7 | 1.5 | 2 | The space under the overhang in the vicinity of the metal soil anchor was observed to be as many as approximately 3" deep (horizontally), at which point solid shotcrete was encountered. |
| 8 | 2.25 | 3 | The space under the overhang in the vicinity of the metal soil anchor was observed to be as many as approximately 4" deep (horizontally), at which point solid shotcrete was encountered. |
| 9 | 2 | 3 | The space under the overhang in the vicinity of the metal soil anchor was observed to be as many as approximately 5" deep (horizontally), at which point solid shotcrete was encountered. |
| 10 | 2 | 3 | The space under the overhang in the vicinity of the metal soil anchor was observed to be as many as approximately 2" deep (horizontally), at which point solid shotcrete was encountered. |
| 11 | 3 | 4 | The space under the overhang in the vicinity of the metal soil anchor was observed to be as many as approximately 11" deep (horizontally), at which point solid shotcrete was encountered. |
| 12 | 3 | 5 | The space under the overhang in the vicinity of the metal soil anchor was observed to be as many as approximately 5" deep (horizontally), at which point solid shotcrete was encountered. |

Notes:
1. Measurement Locations are referenced to the metal soil anchors located along the base of the retaining wall adjacent to I9-10-5, and are oriented from upstream to downstream (i.e., Measurement Location 3 is the third metal soil anchor counted from the upstream end of the retaining wall).

2. Measurement distance represents the vertical distance between the bottom of the small overhang of shotcrete and the top of the underlying ACB.

**TABLE 6-1**
**SURFACE WATER MONITORING RESULTS**

**2014 ANNUAL MONITORING REPORT**
**1 1/2-MILE REACH OF THE HOUSATONIC RIVER**
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

| | | | Parameter | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | | Conventional Parameters | | | | | | | | | | | Field Measurements | | | | | | |
| Sample ID | Sample Location | Date Collected | Aroclor-1016, -1232 (ppb) | Aroclor-1221 (ppb) | Aroclor-1242 (ppb) | Aroclor-1248 (ppb) | Aroclor-1254 (ppb) | Aroclor-1260 (ppb) | Total PCBs (ppb) | Particulate Organic Carbon (ppm) | Total Suspended Solids (ppm) | Volatile Suspended Solids (ppm) | Chlorophyll-a (ppm) | Conductivity (mS/cm) | pH (Standard Units) | Sample Depth (ft) | Turbidity (ntu) | Water Temperature (°C) | Flow (cfs)[1] |
| LOCATION-4 | Lyman Street Bridge | 01/27/14 | ND(0.022) | 0.081 J | ND(0.022) | 0.028 | ND(0.022) | 0.219 J | 0.18 | 0.18 | 3.0 | NA | 0.00027 | 0.318 | 6.91 | 0.59 | 2 | 0.02 | 72 |
| | | 02/20/14 | ND(0.022 J) | ND(0.022 J) | ND(0.022 J) | ND(0.022 J) | ND(0.022 J) | ND(0.022 J) | 0.825 | 0.825 | 4.8 | NA | 0.0032 | 0.794 | 7.78 | 0.73 | 11 | 2.96 | 56 |
| | | 03/27/14 | ND(0.022 J) | ND(0.022 J) | ND(0.022 J) | ND(0.022 J) | ND(0.022 J) | ND(0.022 J) | 0.486 | 0.486 | 2.5 | NA | 0.0016 | 0.395 | 7.33 | 0.57 | 2 | 4.66 | 59 |
| | | 04/24/14 | ND(0.0055 J) | 0.031 J | ND(0.0055 J) | 0.0061 J | ND(0.0055 J) | 0.0861 J | NA | NA | 1.7 | NA | NA | 0.323 | 7.12 | 0.65 | 2 | 10.98 | 84 |
| | | 05/21/14 | ND(0.0055 J) | 0.019 J | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | 0.019 J | NA | NA | 2.2 | NA | NA | 0.287 | 7.49 | 0.58 | 2 | 17.49 | 84 |
| | | 06/26/14 | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | NA | NA | 28 | NA | NA | 0.116 | 7.07 | 2.8 | 23 | 20.22 | 970 |
| | | 07/22/14 | ND(0.0055 J) | 0.017 J | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | 0.017 J | NA | NA | 1.4 J | NA | NA | 0.404 | 7.88 | 0.45 | 2 | 23.69 | 40 |
| | | 08/27/14 | ND(0.0055 J) | 0.022 J | 0.008 J | ND(0.0055 J) | ND(0.0055 J) | 0.03 J | NA | NA | ND(1) | NA | NA | 0.499 | 7.85 | 0.42 | 2 | 21.48 | 36 |
| | | 09/25/14 | ND(0.0055 J) | ND(0.025 J) | 0.015 J | ND(0.0055 J) | ND(0.0055 J) | 0.015 J | NA | NA | 2.6 | NA | NA | 0.576 | 7.30 | 0.48 | 2 | 15.57 | 22 |
| | | 10/30/14 | ND(0.0055 J) | 0.0074 J | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | 0.0074 J | NA | NA | 2.0 | NA | NA | 0.244 | 6.70 | 0.77 | 2 | 9.17 | 146 |
| | | 11/19/14 | ND(0.0055 J) | 0.011 J | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | 0.011 J | NA | NA | 1.8 | NA | NA | 0.268 | NA | 0.73 | 3 | 1.13 | 102 |
| | | 12/17/14 | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | NA | NA | 2.02 | NA | NA | 0.263 | NA | 0.92 | 4 | 2.42 | 178 |
| LOCATION-6A | Pomeroy Avenue | 01/27/14 | ND(0.0055 J) | 0.013 J | 0.006 J | ND(0.0055 J) | ND(0.0055 J) | 0.019 J | ND(0.125) | ND(0.125) | ND(1) | ND(1) | 0.00022 | 0.344 | 7.11 | 0.98 | 2 | 0.09 | 72 |
| | | 02/20/14 | ND(0.0055 J) | 0.0099 J | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | 0.0099 J | 1.69 | 1.69 | 18.3 | 3.62 | 0.0043 | 1.014 | 7.27 | 0.93 | 20 | 0.98 | 56 |
| | | 03/27/14 | ND(0.0055 J) | 0.0089 J | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | 0.0089 J | 0.309 | 0.309 | 2.1 | ND(1) | 0.0028 | 0.425 | 7.28 | 0.83 | 3 | 4.26 | 59 |
| | | 04/24/14 | ND(0.0055 J) | 0.0099 J | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | 0.0099 J | NA | NA | 2.1 | NA | NA | 0.331 | 7.55 | 1.07 | 2 | 10.90 | 84 |
| | | 05/21/14 | ND(0.0055 J) | 0.016 J | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | 0.016 J | NA | NA | 1.4 | NA | NA | 0.301 | 7.65 | 0.97 | 2 | 17.59 | 84 |
| | | 06/26/14 | ND(0.0055 J) | 0.0088 J | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | 0.0088 J | NA | NA | 30 | NA | NA | 0.122 | 7.15 | 4.2 | 21 | 20.40 | 970 |
| | | 07/22/14 | ND(0.0055 J) | 0.016 J | 0.0077 J | ND(0.0055 J) | ND(0.0055 J) | 0.0237 J | NA | NA | 1.2 J | NA | NA | 0.416 | 7.68 | 0.70 | 2 | 23.79 | 40 |
| | | 08/27/14 | ND(0.0055 J) | 0.02 J | 0.0068 J | ND(0.0055 J) | ND(0.0055 J) | 0.0268 J | NA | NA | 1.1 | NA | NA | 0.459 | 7.69 | 0.70 | 2 | 21.25 | 36 |
| | | 09/25/14 | ND(0.0055 J) | ND(0.018 J) | 0.009 J | ND(0.0055 J) | ND(0.0055 J) | 0.009 J | NA | NA | 1.5 | NA | NA | 5.790 | 7.39 | 1.5 | 2 | 15.72 | 22 |
| | | 10/30/14 | ND(0.0055 J) | 0.0066 J | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | 0.0066 J | NA | NA | 1.6 | NA | NA | 0.250 | 6.86 | 1.3 | 2 | 9.44 | 146 |
| | | 11/19/14 | ND(0.0055 J) | 0.01 J | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | 0.01 J | NA | NA | 1.7 | NA | NA | 0.304 | NA | 0.98 | 4 | 1.40 | 102 |
| | | 12/16/14 | ND(0.0055 J) | 0.0068 J | ND(0.0055 J) | ND(0.0055 J) | ND(0.0055 J) | 0.0068 J | NA | NA | 1.4 | NA | NA | 0.246 | 7.21 | 1.4 | 2 | 1.56 | 149 |

Notes:

1. Flow indicated in cubic feet per second (cfs) as recorded upstream at the U.S. Geological Survey (USGS) River Gage Station No. 01197000 on the East Branch of the Housatonic River in Coltsville, MA.
2. On 02/20/14, turbidity at Sample Location-2 and -4 was greater than 5 NTU, nearly a half-inch of rainfall was recorded during 24 hour period prior to sample collection.
3. On 06/26/14, turbidity at Sample Location-2 and -4 was greater than 5 NTU, about 4 inches of rainfall was recorded during 24 hour period prior to sample collection.
4. Sampling methods involved the collection of composite grab samples at each location, representative of three stations (25, 50, and 75 percent of the total river width at each location) at 50 percent of the total river depth at each station. Reported sample depth is the average of the three depths at the composite sample locations.
5. Samples were collected by ARCADIS, and submitted to Pace Analytical Services for analysis.
6. ND - Analyte was not detected. The number in parentheses is the associated reporting limit.
7. J - Indicates an estimated value.
8. NA - Analyte was not analyzed / Parameter was not recorded.

**TABLE 8-1**
**SUMMARY OF POST-CONSTRUCTION MONITORING ACTIVITIES[1]**

**2014 ANNUAL MONITORING REPORT**
**1 1/2-MILE REACH OF THE HOUSATONIC RIVER**
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

| Monitoring Activity | Frequency | Duration | 2015 | 2016 | 2017 | Reporting Requirement | Comments on Future Monitoring Activities |
|---|---|---|---|---|---|---|---|
| **Restoration Monitoring** | | | | | | | |
| Riverbank Plantings | Annually | 2 years after planting; see Note 2 | Add'l Long-Term Monitoring (See Note 2) | | | Trip report to be submitted within 30 days after each monitoring event. | Performed in summer. Visual observations for 2 years to check for survival of plantings installed in 2013 at Parcel I8-23-6. See Section 8.1 of text. |
| Tree Cage Maintenance | Annually | 3 years + Proposal | Add'l Long-Term Monitoring Year 3 | | | | Performed in summer along the entire 1.5 Mile, plus continuation of ongoing Tree Cage Maintenance Program as modified. See Section 8.1 of text. |
| Invasive Species | Annually | 3 years + Proposal | Add'l Long-Term Monitoring Year 3 | | | | Performed in summer along the entire 1.5 Mile, plus continuation of ongoing Invasive Species Control Program. |
| Riverbank Soil Restoration | Annually, and following flow event greater than 3,500 cfs | 3 years + Proposal | Add'l Long-Term Monitoring Year 3 | | | Trip report to be submitted within 30 days after each monitoring event. | Performed during low flow (late spring or summer typically), and after any flow event over 3,500 cfs at Coltsville gage. Visual observation for signs of significant erosion (e.g., ruts, gullies, washouts, or sloughing). |
| Riprap in the River Channel, Riverbank or Swales and ACB | Annually, and following flow event greater than 3,500 cfs | 3 years + Proposal | Add'l Long-Term Monitoring Year 3 | | | | Performed during low flow (late spring or summer typically), and after any flow event over 3,500 cfs at Coltsville gage. Visual observation for reduction in thickness that threatens the stability of the riverbanks or river channel or results in erosion of underlying soils or sediments. Also, for swales, no movement of riprap that results in the exposure of the underlying geotextile fabric. For ACB, no significant damages to the ACB, and to the shotcrete which is tying the ACB to the base of the adjacent retaining wall on Parcel I8-10-5 and the shotcrete at the transition between the ACB and the adjacent riprap at the downstream end of the ACB. |
| Select Critical Ancillary Items | Annually | 3 years + Proposal | Add'l Long-Term Monitoring Year 3 | Five-year Inspection by PE | | | Performed during low flow (late spring or summer typically). Visual observation of retaining walls and designated fences to confirm no substantial variation from as-built condition. Additional inspection by registered professional engineer (PE) in 2016. See Section 8.4 of text. |
| Sediment Sampling | Every 5 years | 15 years + Proposal | | | Third Round | Summary report submitted within 90 days of completion of sampling, including receipt of validated data. | Performed in low flow conditions(recommended for late June or early July). Sampling between Transect 66 and Transect 210 in 200-ft intervals (every 4th transect). |
| Macroinvertebrate Sampling | Every 5 years | 15 years + Proposal | | | Third Round | Summary report submitted within 120 days of completion of sampling, including receipt of validated data. | Performed in low flow conditions(recommended for late June or early July). Sampling at Transects T070, T134 and T170. |
| Surface Water Sampling | Monthly | Indefinite | | | | See Note 3. | See Note 3. |
| ERE Inspections | Once per year | In perpetuity | | | | Summary report to be submitted within 30 days of the inspection. | Performed in November at non-GE-owned and non-State owned parcels with EREs. |
| Conditional Solutions Inspections | Once per year | In perpetuity | | | | Summary report to be submitted within 30 days of the inspection. | Performed in November at parcels with Conditional Solutions. |

Notes:
1. Please refer to EPA's *Final Post-Removal Site Control Plan: 1 1/2-Mile Removal Reach* , March 2011, for additional details.
2. GE will inspect recent and new trees and shrubs for a 2-year period after planting completed in 2013 at Parcel I8-23-6. See Section 8.1 of text.
3. Pursuant to EPA's Final Post-Removal Site Control Plan: 1 1/2-Mile Removal Reach, GE will continue with its ongoing monthly water sampling at Lyman Street and Pomeroy Avenue and report the results in the Annual Report. If GE discontinues its current monthly water column sampling, EPA reserves the right to require GE to perform water column monitoring as part of the 1 1/2 Mile activities.
4. GE will notify EPA of all scheduled monitoring, inspections and maintenance activities, except for surface water sampling, 14 days in advance to allow for arrangements of oversight.
5. All monitoring activities will be summarized in an Annual Report, which will include a summary of all monitoring and any corrective actions that were performed. Annual reports are to be submitted by January 31st of the following year.
6. For those monitoring programs for which “Proposal” is noted, GE will submit a proposal to EPA at the end of the specified monitoring period regarding the need for and scope of continued long-term monitoring.

ARCADIS

# Figures

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: LJPOSENAUER LD:(Opt) PIC:(Opt) PM:(Reqd) TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
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XREFS: 31044X00
IMAGES: 31044X01.sid, 31044X02.sid

Lyman Street

PHASE 1

Elm Street

PHASE 2

HOUSATONIC RIVER

Dawes Avenue

PHASE 3

Pomeroy Avenue

PHASE 4

Confluence

0 250' 500'
GRAPHIC SCALE

NOTES:

1. THE BASEMAP IMAGES PRESENTED ON THIS FIGURE WERE OBTAINED FROM THE OFFICE OF GEOGRAPHIC AND ENVIRONMENTAL INFORMATION (MassGIS) COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS 1:5000 COLOR ORTHO IMAGERY, 2005.
2. NOT ALL PHYSICAL FEATURES SHOWN.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
**2014 ANNUAL MONITORING REPORT**
**1 1/2-MILE REACH OF THE HOUSATONIC RIVER**

# STUDY AREA LOCATION MAP

ARCADIS

FIGURE
**1-1**

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: D.KNUTSEN TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
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XREFS: 31044X00
IMAGES: 31044X01.sid, 31044X02.sid

AREA WITH OBSERVED EROSION OF BANK IN UNREMEDIATED AREA

I9-4-201
(FORMERLY I9-4-23)

I9-4-25

NEW SILVER LAKE OUTFALL

I9-4-203

I9-4-19

I9-4-14

I8-24-5

I8-24-101

I8-24-1

HARRY'S SUPERMARKET

I8-23-1

I8-23-103
(FORMERLY I8-23-2 & I8-23-3)

I8-23-4

I8-23-6

I9-5-1

I9-5-16

I9-5-15

I9-5-14

I9-5-13

LAUNDROMAT

HOUSATONIC RIVER

Lyman St.

Hathaway St.

Ashley St.

Day St.

Root Pl.

Cove St.

Elm St.

Massachusetts Ave.

0 100' 200'
GRAPHIC SCALE

LEGEND:

- I9-4-19 — PARCEL ID
- APPROXIMATE PROPERTY LINE
- APPROXIMATE LOCATION OF RETAINING WALL
- APPROXIMATE AREA REPLANTED IN FALL 2012/ SPRING 2013 WITH 15 TREES AND SHRUBS

NOTES:

1. THE BASEMAP IMAGES PRESENTED ON THIS FIGURE WERE OBTAINED FROM THE OFFICE OF GEOGRAPHIC AND ENVIRONMENTAL INFORMATION (MassGIS) COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS 1:5000 COLOR ORTHO IMAGERY, 2005.
2. NOT ALL PHYSICAL FEATURES SHOWN.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
**2014 ANNUAL MONITORING REPORT**
**1 1/2-MILE REACH OF THE HOUSATONIC RIVER**

# PHASE 1 STUDY AREA MONITORING

ARCADIS

FIGURE
**3-1**

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: D,KNUTSEN TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
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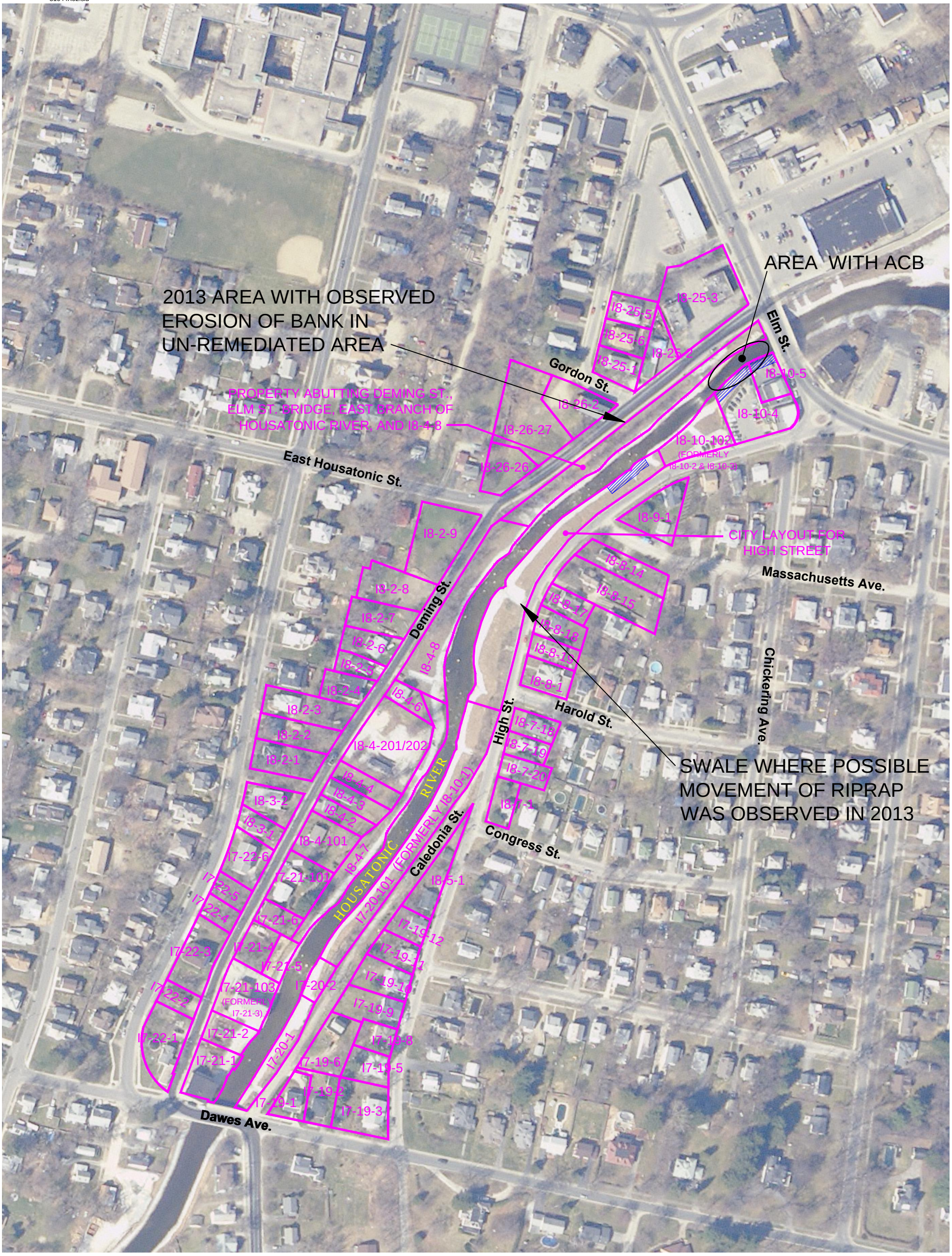


0 100' 200'
GRAPHIC SCALE

LEGEND:

I7-19-1 PARCEL ID

APPROXIMATE PROPERTY LINE

APPROXIMATE LOCATION OF RETAINING WALL

NOTES:

1. THE BASEMAP IMAGES PRESENTED ON THIS FIGURE WERE OBTAINED FROM THE OFFICE OF GEOGRAPHIC AND ENVIRONMENTAL INFORMATION (MassGIS) COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS 1:5000 COLOR ORTHO IMAGERY, 2005.
2. NOT ALL PHYSICAL FEATURES SHOWN.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
**2014 ANNUAL MONITORING REPORT**
**1 1/2-MILE REACH OF THE HOUSATONIC RIVER**

# PHASE 2 STUDY AREA MONITORING

ARCADIS

FIGURE
**3-2**

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: D.KNUTSEN TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
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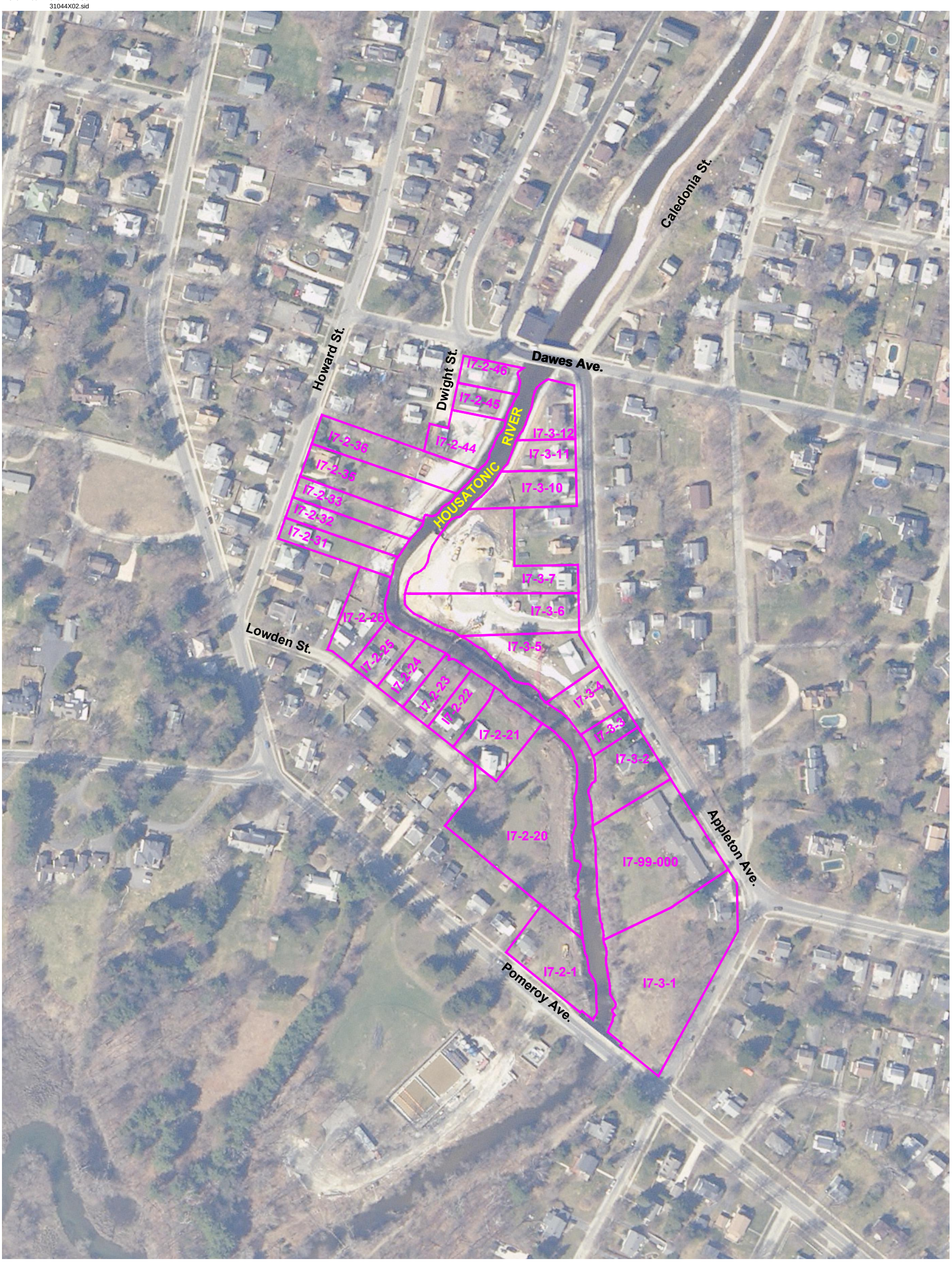


0 100' 200'
GRAPHIC SCALE

LEGEND:

I7-2-20 PARCEL ID

APPROXIMATE PROPERTY LINE

NOTES:

1. THE BASEMAP IMAGES PRESENTED ON THIS FIGURE WERE OBTAINED FROM THE OFFICE OF GEOGRAPHIC AND ENVIRONMENTAL INFORMATION (MassGIS) COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS 1:5000 COLOR ORTHO IMAGERY, 2005.
2. NOT ALL PHYSICAL FEATURES SHOWN.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

# 2014 ANNUAL MONITORING REPORT
# 1 1/2-MILE REACH OF THE HOUSATONIC RIVER

## PHASE 3 STUDY AREA MONITORING

ARCADIS

FIGURE
3-3

CITY: SYRACUSE, NY DIV/GROUP: ENVCAD DB: L.POSENAUER LD:(Opt) PIC:(Opt) PM: D.KNUTSEN TM:(Opt) LYR:(Opt)ON=*;OFF=*REF*
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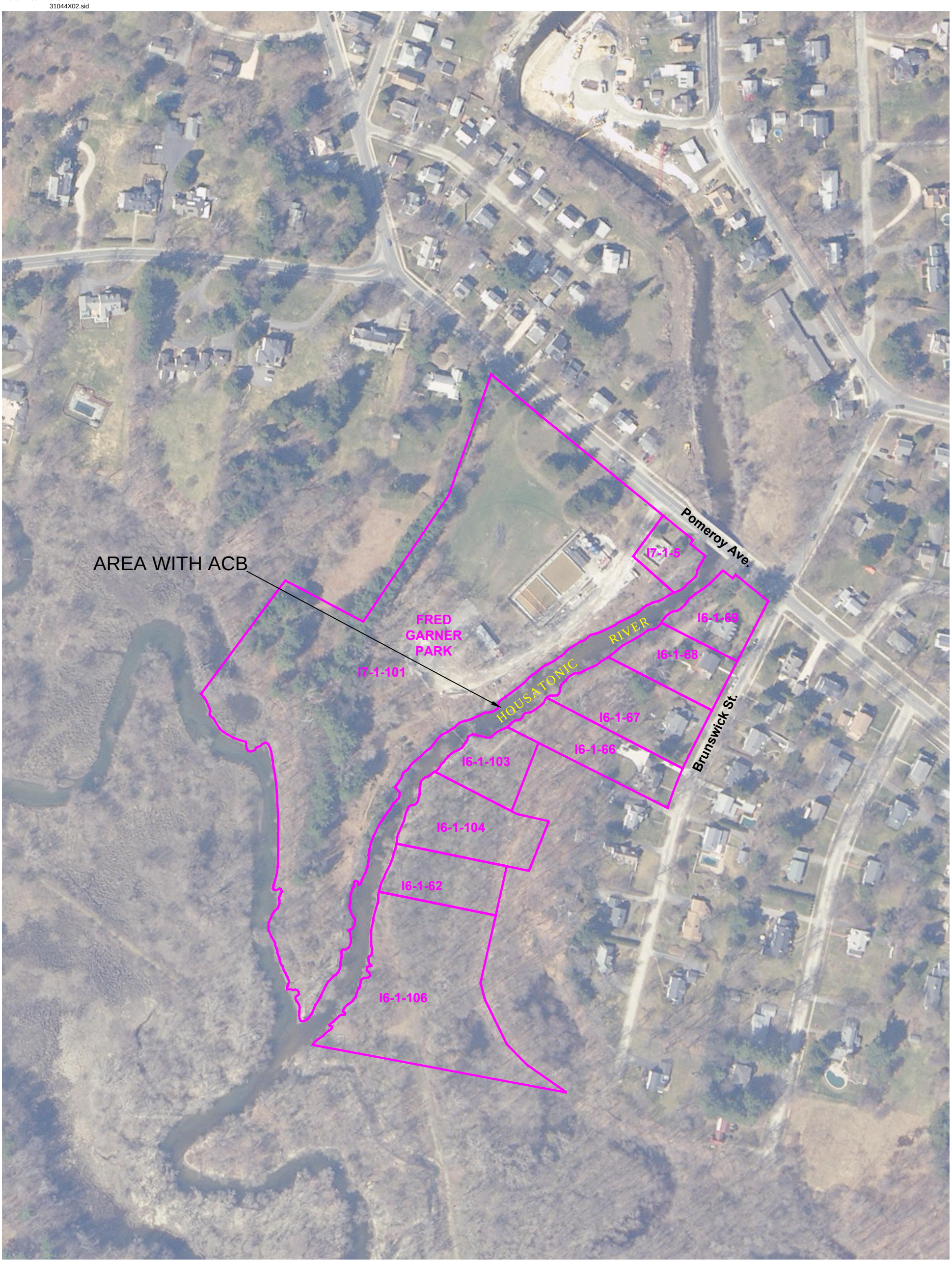


0 100' 200'
GRAPHIC SCALE

LEGEND:

I6-1-106 PARCEL ID

APPROXIMATE PROPERTY LINE

NOTES:

1. THE BASEMAP IMAGES PRESENTED ON THIS FIGURE WERE OBTAINED FROM THE OFFICE OF GEOGRAPHIC AND ENVIRONMENTAL INFORMATION (MassGIS) COMMONWEALTH OF MASSACHUSETTS EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS 1:5000 COLOR ORTHO IMAGERY, 2005.
2. NOT ALL PHYSICAL FEATURES SHOWN.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
**2014 ANNUAL MONITORING REPORT**
**1 1/2-MILE REACH OF THE HOUSATONIC RIVER**

# PHASE 4 STUDY AREA MONITORING

ARCADIS

FIGURE
**3-4**

ARCADIS

# Appendices

## Appendix A

Field Data Sheets from 2014
Inspection/Monitoring Activities

Riverbank Soil Restoration, Riprap, Aquatic Habitat Enhancement Structures, and Select Critical Ancillary Items Monitoring Field Data Sheets

**RIVERBANK SOIL, RIPRAP, AND ARTICULATED CONCRETE BLOCKS (ACB) MONITORING FIELD FORM**

**Date:** 9/16/14
**Lead Monitor:** Lauren Putnam

| Monitoring Area | Monitoring Program | Comments/Recommendations and Brief Description of Specific Location |
|---|---|---|
| Lyman St Bridge to Elm Street Bridge | Soil: | No problems identified. Some potential minor erosion was observed in an unremediated area at the top of bank on I9-4-201; however, achievement of the Maintenance Standards is not affected. Area will continue to be monitored in 2015. |
| | Riprap: | No problems identified. |
| Elm Street Bridge to Dawes Ave Bridge | Soil: | No problems identified. |
| | Riprap: | No problems identified. |
| | ACB: | No problems identified. |
| Dawes Ave Bridge to Pomeroy Ave Bridge | Soil: | No problems identified. |
| | Riprap: | No problems identified. |
| Pomeroy Ave to the Confluence | Soil: | No problems identified. |
| | Riprap: | No problems identified. |
| | ACB: | No problems identified. |

**THE RETAINING WALLS LOCATED AT PARCELS I8-23-6 AND I8-24-1 INSPECTION FIELD FORM**

**Date:** __9/16/14_____
**Lead Monitor:** _____Lauren Putnam_____

**Retaining wall:** **Parcel I8-23-6 OR [I8-24-I]**
(circle one)

| **Wall Deflection Indicators** | | **Comments** |
|---|---|---|
| **1. GENERAL CONDITION** | [GOOD] FAIR POOR | |
| Good interlocking of riprap Protection | [YES] NO | |
| Scour of riprap @ Toe occurring | YES [NO] | |
| (Length____, Width____, Depth____) | | |
| Loss of section of riprap or Soil | YES [NO] | |
| (Length____, Width____, Depth____) | | |
| **2. SLOPES** | | |
| General Condition | [GOOD] FAIR POOR | |
| Displacement of riprap or soil | YES [NO] | |
| Settlement | YES [NO] | |
| Sloughing/Slumping | YES [NO] | |
| Exposed Underlayer | YES [NO] | |
| **3. TOP OF RIVERBANK** | | |
| General Condition | [GOOD] FAIR POOR | |
| Displacement of soil | YES [NO] | |
| Settlement | YES [NO] | |
| Sloughing/Slumping | YES [NO] | |
| Exposed Underlayer | YES [NO] | |
| **4. OTHER** | | |
| Cracks in vegetative areas | YES [NO] | |
| Visible bulge on the riverbank slope | YES [NO] | |
| **4. AREA 20-FT BEYOND TOP OF RIVERBANK** | | |
| Cracks in vegetative areas | YES [NO] | |
| Cracks in pavement parallel to top of bank | YES [NO] | |
| Pronounced drop in ground surface elevation | YES [NO] | |
| Excessively leaning trees, utility poles or fences | YES [NO] | |
| **PHOTOGRAPHS:** | YES [NO] | |

**RECOMMENDATIONS:**

**THE RETAINING WALL LOCATED AT PARCELS I8-10-5 INSPECTION FIELD FORM**

**Date:** __9/16/14_____
**Lead Monitor:** _____Lauren Putnam_____

**Retaining wall: Parcel I8-10-5**

| **Wall Deflection Indicators** | | **Comments** |
|---|---|---|
| **1. GENERAL CONDITION** | GOOD FAIR POOR | |
| Exposed Wall Face Condition | Good Fair Poor | |
| Parking Lot Condition | Good Fair Poor | |
| **2. EXPOSED WALL FACE** | | |
| General Condition | GOOD FAIR POOR | |
| Deteriorated Concrete (e.g., flaking, spalling) | YES NO | |
| Cracking of wall | YES NO | |
| Cracking around anchor heads | YES NO | |
| (if Yes, describe pattern, e.g., parallel lines or circular_____) | | |
| Interface between wall and Elm St. Bridge Abutment : Excessively wide gap | YES NO | |
| Interface between wall and ACB: Excessively wide gap | YES NO | |
| **3. PARKING LOT (approx 20-ft behind wall)** | | |
| General Condition | GOOD FAIR POOR | |
| Cracks in asphalt pavement parallel to the wall | YES NO | |
| Excessively leaning fences | YES NO | |
| **4. OTHER** | | |
| Depressed area along the rear of wall | YES NO | |
| **PHOTOGRAPHS:** | YES NO | |
| **RECOMMENDATIONS:** | | |

**THE RETAINING WALLS LOCATED AT PARCELS I8-10-4 AND CITY LAYOUT FOR HIGH STREET ABUTTING HIGH STREET FORMALLY PARCEL I8-10-1 INSPECTION FIELD FORM**

**Date:** 9/16/14
**Lead Monitor:** Lauren Putnam

**Retaining wall:** **Parcel I8-10-4** **OR** **Layout for High St (formally I8-10-1)**
(circle one)

| **Wall Deflection Indicators** | | **Comments** |
|---|---|---|
| **1. GENERAL CONDITION** | GOOD FAIR POOR | |
| Timber Facades | Good Fair Poor | |
| Paved Areas behind wall | Good Fair Poor | |
| **2. EXPOSED TIMBER FACADES** | | |
| General Condition | GOOD FAIR POOR | |
| Missing, damaged or loose boards | YES NO | |
| (if Yes, describe _____) | | |
| **3. PAVED AREAS (approx 20-ft behind wall)** | | |
| General Condition | GOOD FAIR POOR | |
| Cracks in asphalt pavement parallel to the wall | YES NO | |
| Excessively cracked curbs | YES NO | |
| **4. OTHER** | | |
| Pronounced drop in ground surface elevation | YES NO | |
| Excessively leaning fences, trees or utility poles | YES NO | |
| **PHOTOGRAPHS:** | YES NO | |
| **RECOMMENDATIONS:** | | |

**OTHER CRITICAL ANCILLARY ITEMS INSPECTION FIELD FORM**

**Date:** __9/16/14_____
**Lead Monitor:** _____Lauren Putnam_____

| General Condition | Comments |
|---|---|
| Fencing on top of the retaining walls on Parcel I8-10-4 and I8-10-5 | No problems identified. |
| Fencing on top of the retaining wall adjacent to the City Layout for High Street | No problems identified. |
| Fencing along Caledonia Street | No problems identified. |

Data Sheets for Inspection of
Properties Subject to EREs

**ERE ANNUAL INSPECTION CHECKLIST – 1.5 MILE REACH**
**PARCEL: I7-21-1**

## DOCUMENT REVIEW

Conducted By: Paolo Filippetti (ARCADIS) Phone Number: (585) 662-4035
Representing: GE Review Start Date: November 10, 2014

1. [X] Check here to confirm that the Grant of Environmental Restriction and Easement (ERE) has been reviewed.

2. [X] Check here to confirm that the Plan of Restricted Area (as revised if appropriate) has been reviewed.

3. [X] Check here to confirm that the description of this property in the Final Completion Report and the as-built survey drawings covering this property included in the Final Completion Report (and any alternative plan proposed by GE for the comparison described in Item 7 on next page) have been reviewed.

4. Are there any recorded amendments to or releases from the ERE, and/or any known conditional exceptions under the ERE and of which the reviewing party has a copy, and/or any other documents in GE's possession relevant to the ERE or the use of the property?

   [X] No
   [ ] Yes – If yes, review those items for background information purposes and list them below (along with the book and page reference in the Registry of Deeds where applicable). (Note that the document reviewer has no obligation to verify the accuracy or completeness of any of these documents, either as of the time they were prepared or as compared to the current conditions.)

5. Review Completed Date: November 18, 2014

## VISUAL ON-SITE INSPECTION

Conducted By: Gregg Rabasco (ARCADIS )
Inspection Start Date: November 18, 2014 Representing: GE

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental/EPA

2. Is there any visual evidence of activities and uses of the Restricted Area of the property since the last inspection that are potentially contrary to the restrictions of the ERE?

   [X] No
   [ ] Yes - If yes, describe below.

**ERE ANNUAL INSPECTION CHECKLIST – 1.5 MILE REACH**
**PARCEL: I7-21-1**

3. Is there any visual evidence of utility work or building construction, modification, addition, or demolition at the Restricted Area of the property since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

4. Is there any visual evidence of soil excavation at the Restricted Area of the property that generated more than 10 cubic yards of soil since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. Is there any visual evidence of significant soil erosion at the Restricted Area of the property since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such erosion on a plan.

6. Is there any visual evidence of significant pavement construction, disturbance, or excavations at the Restricted Area of the property since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

7. If any of the conditions listed in the response to Questions 3 through 6 appears likely to have altered the surface grade the Restricted Area of the property compared to the surface grade shown on the as-built drawings included in the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the above listed drawing and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

8. Inspection Completed: November 18, 2014

**ERE ANNUAL INSPECTION CHECKLIST – 1.5 MILE REACH**
**PARCEL: I8-4-8**

## DOCUMENT REVIEW

Conducted By: Paolo Filippetti (ARCADIS) Phone Number: (585) 662-4035
Representing: GE Review Start Date: November 10, 2014

1. [X] Check here to confirm that the Grant of Environmental Restriction and Easement (ERE) has been reviewed.

2. [X] Check here to confirm that the Plan of Restricted Area (as revised if appropriate) has been reviewed.

3. [X] Check here to confirm that the description of this property in the Final Completion Report and the as-built survey drawings covering this property included in the Final Completion Report (and any alternative plan proposed by GE for the comparison described in Item 7 on next page) have been reviewed.

4. Are there any recorded amendments to or releases from the ERE, and/or any known conditional exceptions under the ERE and of which the reviewing party has a copy, and/or any other documents in GE's possession relevant to the ERE or the use of the property?

   [X] No
   [ ] Yes – If yes, review those items for background information purposes and list them below (along with the book and page reference in the Registry of Deeds where applicable). (Note that the document reviewer has no obligation to verify the accuracy or completeness of any of these documents, either as of the time they were prepared or as compared to the current conditions.)

5. Review Completed Date: November 18, 2014

## VISUAL ON-SITE INSPECTION

Conducted By: Gregg Rabasco (ARCADIS )
Inspection Start Date: November 18, 2014 Representing: GE

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental/EPA

2. Is there any visual evidence of activities and uses at the Restricted Area of the property since the last inspection that are potentially contrary to the restrictions of the ERE?

   [X] No
   [ ] Yes - If yes, describe below.

**ERE ANNUAL INSPECTION CHECKLIST – 1.5 MILE REACH**
**PARCEL: I8-4-8**

3. Is there any visual evidence of utility work or building construction, modification, addition, or demolition at the Restricted Area of the property since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

4. Is there any visual evidence of soil excavation at the Restricted Area of the property that generated more than 10 cubic yards of soil since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. Is there any visual evidence of significant soil erosion at the Restricted Area of the property since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such erosion on a plan.

6. Is there any visual evidence of significant pavement construction, disturbance, or excavations at the Restricted Area of the property since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

7. If any of the conditions listed in the response to Questions 3 through 6 appears likely to have altered the surface grade of the Restricted Area of the property compared to the surface grade shown on the as-built drawings included in the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the above listed drawing and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

8. Inspection Completed: November 18, 2014

**ERE ANNUAL INSPECTION CHECKLIST – 1.5 MILE REACH**
**PARCEL: I7-21-5**

## DOCUMENT REVIEW

Conducted By: Paolo Filippetti (ARCADIS) Phone Number: (585) 662-4035
Representing: GE Review Start Date: November 10, 2014

1. [X] Check here to confirm that the Grant of Environmental Restriction and Easement (ERE) has been reviewed.

2. [X] Check here to confirm that the Plan of Restricted Area (as revised if appropriate) has been reviewed.

3. [X] Check here to confirm that the description of this property in the Final Completion Report and the as-built survey drawings covering this property included in the Final Completion Report (and any alternative plan proposed by GE for the comparison described in Item 7 on next page) have been reviewed.

4. Are there any recorded amendments to or releases from the ERE, and/or any known conditional exceptions under the ERE and of which the reviewing party has a copy, and/or any other documents in GE's possession relevant to the ERE or the use of the property?

   [X] No
   [ ] Yes – If yes, review those items for background information purposes and list them below (along with the book and page reference in the Registry of Deeds where applicable). (Note that the document reviewer has no obligation to verify the accuracy or completeness of any of these documents, either as of the time they were prepared or as compared to the current conditions.)

5. Review Completed Date: November 18, 2014

## VISUAL ON-SITE INSPECTION

Conducted By: Gregg Rabasco (ARCADIS )
Inspection Start Date: November 18, 2014 Representing: GE

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental/EPA

2. Is there any visual evidence of activities and uses of the property since the last inspection that are potentially contrary to the restrictions of the ERE?

   [X] No
   [ ] Yes - If yes, describe below.

**ERE ANNUAL INSPECTION CHECKLIST – 1.5 MILE REACH**
**PARCEL: I7-21-5**

3. Is there any visual evidence of utility work or building construction, modification, addition, or demolition at the property since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

4. Is there any visual evidence of soil excavation at the property that generated more than 10 cubic yards of soil since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. Is there any visual evidence of significant soil erosion at the property since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such erosion on a plan.

6. Is there any visual evidence of significant pavement construction, disturbance, or excavations at the property since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

7. If any of the conditions listed in the response to Questions 3 through 6 appears likely to have altered the surface grade of the property compared to the surface grade shown on the as-built drawings included in the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the above listed drawing and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

8. Inspection Completed: November 18, 2014

**ERE ANNUAL INSPECTION CHECKLIST – 1.5 MILE REACH**
**PARCEL: I8-10-102**

## DOCUMENT REVIEW

Conducted By: Paolo Filippetti (ARCADIS) Phone Number: (585) 662-4035
Representing: GE Review Start Date: November 10, 2014

1. [X] Check here to confirm that the Grant of Environmental Restriction and Easement (ERE) has been reviewed.

2. [X] Check here to confirm that the Plan of Restricted Area (as revised if appropriate) has been reviewed.

3. [X] Check here to confirm that the description of this property in the Final Completion Report and the as-built survey drawings covering this property included in the Final Completion Report (and any alternative plan proposed by GE for the comparison described in Item 7 on next page) have been reviewed.

4. Are there any recorded amendments to or releases from the ERE, and/or any known conditional exceptions under the ERE and of which the reviewing party has a copy, and/or any other documents in GE's possession relevant to the ERE or the use of the property?

   [X] No
   [ ] Yes – If yes, review those items for background information purposes and list them below (along with the book and page reference in the Registry of Deeds where applicable). (Note that the document reviewer has no obligation to verify the accuracy or completeness of any of these documents, either as of the time they were prepared or as compared to the current conditions.)

5. Review Completed Date: November 18, 2014

## VISUAL ON-SITE INSPECTION

Conducted By: Gregg Rabasco (ARCADIS )
Inspection Start Date: November 18, 2014 Representing: GE

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental/EPA

2. Is there any visual evidence of activities and uses of the property since the last inspection that are potentially contrary to the restrictions of the ERE?

   [X] No
   [ ] Yes - If yes, describe below.

**ERE ANNUAL INSPECTION CHECKLIST – 1.5 MILE REACH**
**PARCEL: I8-10-102**

3. Is there any visual evidence of utility work or building construction, modification, addition, or demolition at the property since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

4. Is there any visual evidence of soil excavation at the property that generated more than 10 cubic yards of soil since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. Is there any visual evidence of significant soil erosion at the property since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such erosion on a plan.

6. Is there any visual evidence of significant pavement construction, disturbance, or excavations at the property since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

7. If any of the conditions listed in the response to Questions 3 through 6 appears likely to have altered the surface grade of the property compared to the surface grade shown on the as-built drawings included in the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the above listed drawing and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

8. Inspection Completed: November 18, 2014

**ERE ANNUAL INSPECTION CHECKLIST – 1.5 MILE REACH**
**PARCELS: I7-20-1, I7-20-2, AND I7-20-101**

## DOCUMENT REVIEW

Conducted By: Paolo Filippetti (ARCADIS) Phone Number: (585) 662-4035
Representing: GE Review Start Date: November 10, 2014

1. [X] Check here to confirm that the Grant of Environmental Restriction and Easement (ERE) has been reviewed.

2. [X] Check here to confirm that the Plan of Restricted Area (as revised if appropriate) has been reviewed.

3. [X] Check here to confirm that the description of this property in the Final Completion Report and the as-built survey drawings covering this property included in the Final Completion Report (and any alternative plan proposed by GE for the comparison described in Item 7 on next page) have been reviewed.

4. Are there any recorded amendments to or releases from the ERE, and/or any known conditional exceptions under the ERE and of which the reviewing party has a copy, and/or any other documents in GE's possession relevant to the ERE or the use of the property?

   [X] No
   [ ] Yes – If yes, review those items for background information purposes and list them below (along with the book and page reference in the Registry of Deeds where applicable). (Note that the document reviewer has no obligation to verify the accuracy or completeness of any of these documents, either as of the time they were prepared or as compared to the current conditions.)

5. Review Completed Date: November 18, 2014

## VISUAL ON-SITE INSPECTION

Conducted By: Gregg Rabasco (ARCADIS )
Inspection Start Date: November 18, 2014 Representing: GE

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental/EPA

2. Is there any visual evidence of activities and uses of the property since the last inspection that are potentially contrary to the restrictions of the ERE?

   [X] No
   [ ] Yes - If yes, describe below.

**ERE ANNUAL INSPECTION CHECKLIST – 1.5 MILE REACH**
**PARCELS: I7-20-1, I7-20-2, AND I7-20-101**

3. Is there any visual evidence of utility work or building construction, modification, addition, or demolition at the property since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

4. Is there any visual evidence of soil excavation at the property that generated more than 10 cubic yards of soil since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. Is there any visual evidence of significant soil erosion at the property since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such erosion on a plan.

6. Is there any visual evidence of significant pavement construction, disturbance, or excavations at the property since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

7. If any of the conditions listed in the response to Questions 3 through 6 appears likely to have altered the surface grade of the property compared to the surface grade shown on the as-built drawings included in the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the above listed drawing and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

8. Inspection Completed: November 18, 2014

**ERE ANNUAL INSPECTION CHECKLIST**

**HOUSATONIC RIVER - 1.5 MILE REACH AND**
**ADJACENT NON-RESIDENTIAL FLOODPLAIN PROPERTIES**

**PARCEL I8-4-7 (including riverbank)**

## DOCUMENT REVIEW

Conducted By: Paolo Filippetti, ARCADIS
Representing: GE
Phone Number: (585) 662-4035
Review Start Date: 11/10/2014

1. [X] Check here to confirm that the Grant of Environmental Restriction and Easement (ERE) has been reviewed.

2. [X] Check here to confirm that the Plan of Restricted Area (as revised if appropriate) has been reviewed.

3. [X] Check here to confirm that the relevant property descriptions and as-built survey plans provided in the *Final Completion Report for Removal Action for Housatonic River Floodplain-Non-Residential Properties* (Floodplain Non-Residential Final Completion Report) and the *Final Completion Report: 1½ Mile Reach Removal Action* (and any alternative plan proposed by GE for the comparison described in Item 7 on next page) have been reviewed and are available for review in the field during the inspection.

4. Are there any recorded amendments to or releases from the ERE, and/or any known conditional exceptions under the ERE, and/or any Post-Work Notification Forms which have been submitted by the Grantor under the ERE and of which the reviewing party has a copy, and/or any other documents in GE's possession relevant to the ERE or the use of this property?
   - [X] No
   - [ ] Yes - If yes, review those items for background informational purposes and list them below (along with the book and page reference in the Registry of Deeds where applicable). (Note that the document reviewer has no obligation to verify the accuracy or completeness of any of these documents, either as of the time they were prepared or as compared to current conditions).

5. Review Completed Date: 11/17/2014

## VISUAL ON-SITE INSPECTION

Conducted By: Gregg Rabasco, ARCADIS
Representing: GE
Phone Number: (413) 822-1184
Inspection Start Date: 11/18/2014

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental

2. Is there any visual evidence of activities and uses of the property since the last inspection that are potentially contrary to the restrictions of the ERE?
   - [X] No
   - [ ] Yes - If yes, describe below.

**ERE ANNUAL INSPECTION CHECKLIST**

**HOUSATONIC RIVER - 1.5 MILE REACH AND**
**ADJACENT NON-RESIDENTIAL FLOODPLAIN PROPERTIES**

**PARCEL I8-4-7 (including riverbank)**

3. Is there any visual evidence of utility work or building construction, modification, addition, or demolition since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

4. Is there any visual evidence of soil excavation that generated more than 10 cubic yards of soil since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. Is there any visual evidence of significant soil erosion since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such erosion on a plan.

6. Is there any visual evidence of significant pavement construction, disturbance, or excavations since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

7. If any of the conditions listed in the responses to Questions 3 through 6 appears likely to have altered the surface grade of the property, identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the relevant survey drawing included in the Floodplain Non-Residential Final Completion Report (or an alternative, more recent plan proposed by GE). (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

8. Inspection Completed: 11/18/2014

**ERE ANNUAL INSPECTION CHECKLIST**

**HOUSATONIC RIVER - 1.5 MILE REACH AND**
**ADJACENT NON-RESIDENTIAL FLOODPLAIN PROPERTIES**

**PARCEL I7-1-101 (including riverbank)**

## DOCUMENT REVIEW

Conducted By: Paolo Filippetti, ARCADIS
Representing: GE
Phone Number: (585) 662-4035
Review Start Date: 11/10/2014

1. [X] Check here to confirm that the Grant of Environmental Restriction and Easement (ERE) has been reviewed.

2. [X] Check here to confirm that the Plan of Restricted Area (as revised if appropriate) has been reviewed.

3. [X] Check here to confirm that the relevant property descriptions and as-built survey plans provided in the *Final Completion Report for Removal Action for Housatonic River Floodplain-Non-Residential Properties* (Floodplain Non-Residential Final Completion Report) and the *Final Completion Report: 1½ Mile Reach Removal Action* (and any alternative plan proposed by GE for the comparison described in Item 7 on next page) have been reviewed and are available for review in the field during the inspection.

4. Are there any recorded amendments to or releases from the ERE, and/or any known conditional exceptions under the ERE, and/or any Post-Work Notification Forms which have been submitted by the Grantor under the ERE and of which the reviewing party has a copy, and/or any other documents in GE's possession relevant to the ERE or the use of this property?

   [X] No

   [ ] Yes - If yes, review those items for background informational purposes and list them below (along with the book and page reference in the Registry of Deeds where applicable). (Note that the document reviewer has no obligation to verify the accuracy or completeness of any of these documents, either as of the time they were prepared or as compared to current conditions).

5. Review Completed Date 11/17/2014

## VISUAL ON-SITE INSPECTION

Conducted By: Gregg Rabasco, ARCADIS
Representing: GE
Phone Number: (413) 822-1184
Inspection Start Date: 11/18/2014

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental

2. Is there any visual evidence of activities and uses of the property since the last inspection that are potentially contrary to the restrictions of the ERE?

   [X] No

   [ ] Yes - If yes, describe below.

**ERE ANNUAL INSPECTION CHECKLIST**

**HOUSATONIC RIVER - 1.5 MILE REACH AND**
**ADJACENT NON-RESIDENTIAL FLOODPLAIN PROPERTIES**

**PARCEL I7-1-101 (including riverbank)**

3. Is there any visual evidence of utility work or building construction, modification, addition, or demolition since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

4. Is there any visual evidence of soil excavation that generated more than 10 cubic yards of soil since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. Is there any visual evidence of significant soil erosion since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such erosion on a plan.

6. Is there any visual evidence of significant pavement construction, disturbance, or excavations since the last inspection?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

7. If any of the conditions listed in the responses to Questions 3 through 6 appears likely to have altered the surface grade of the property, identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the relevant survey drawing included in the Floodplain Non-Residential Final Completion Report (or an alternative, more recent plan proposed by GE). (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

8. Inspection Completed: 11/18/2014

Data Sheets for Inspections of Properties Subject to Conditional Solutions

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**
**FOR PARCELS I8-24-1, I7-21-2 & -103, I8-23-103, AND I8-23-4 WITHIN 1.5 MILE REACH**

**PARCEL NUMBER** I8-24-1

**DOCUMENT REVIEW**

Conducted By: Paolo Filippetti (ARCADIS) Phone Number: 585-662-4035
Representing: GE Review Start Date: November 3, 2014

1. [X] Check here to confirm that the description of the Conditional Solution for this property in the Final Completion Report, and the as-built drawings covering this property included in Final Completion Report (and any alternative plan proposed by GE for the comparison described in Item 5 on next page), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree have been reviewed.

2. [X] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds for this property have been reviewed.

3. Has there been a change in ownership of this property?
   - [X] No
   - [ ] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

4. Review Completed: November 18, 2014

**VISUAL ON-SITE INSPECTION**

Conducted By: Gregg Rabasco (ARCADIS) Phone Number: 413-822-1184
Representing: GE Inspection Start Date: November 18, 2014

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental/EPA

2. Is there any visual evidence of changes in activities and uses of the riverbank portion of the property since the last Conditional Solution inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented? (i.e., recreational use)?
   - [X] No
   - [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the riverbank portion of the property since the last Conditional Solution inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**
**FOR PARCELS I8-24-1, I7-21-2 & -103, I8-23-103, AND I8-23-4 WITHIN 1.5 MILE REACH**

4. Is there any visual evidence of excavations, construction, or other activities or conditions since the last Conditional Solution inspection that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the riverbank portion of the property?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. If any of the conditions listed in the response to Questions 3 and 4 appears likely to have altered the surface grade of the riverbank portion of the property compared with the as-built survey drawings included in the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the above-listed drawings and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

6. Inspection Completed Date: November 18, 2014

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**
**FOR PARCELS I8-24-1, I7-21-2 & -103, I8-23-103, AND I8-23-4 WITHIN 1.5 MILE REACH**

**PARCEL NUMBER** I7-21-2 & -103

**DOCUMENT REVIEW**

Conducted By: Paolo Filippetti (ARCADIS) Phone Number: 585-662-4035
Representing: GE Review Start Date: November 3, 2014

1. [X] Check here to confirm that the description of the Conditional Solution for this property in the Final Completion Report, and the as-built drawings covering this property included in Final Completion Report (and any alternative plan proposed by GE for the comparison described in Item 5 on next page), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree have been reviewed.

2. [X] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds for this property have been reviewed.

3. Has there been a change in ownership of this property?
   - [X] No
   - [ ] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

4. Review Completed: November 18, 2014

**VISUAL ON-SITE INSPECTION**

Conducted By: Gregg Rabasco (ARCADIS) Phone Number: 413-822-1184
Representing: GE Inspection Start Date: November 18, 2014

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental/EPA

2. Is there any visual evidence of changes in activities and uses of the riverbank portion of the property since the last Conditional Solution inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented? (i.e., recreational use)?
   - [X] No
   - [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the riverbank portion of the property since the last Conditional Solution inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**
**FOR PARCELS I8-24-1, I7-21-2 & -103, I8-23-103, AND I8-23-4 WITHIN 1.5 MILE REACH**

4. Is there any visual evidence of excavations, construction, or other activities or conditions since the last Conditional Solution inspection that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the riverbank portion of the property?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. If any of the conditions listed in the response to Questions 3 and 4 appears likely to have altered the surface grade of the riverbank portion of the property compared with the as-built survey drawings included in the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the above-listed drawings and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

6. Inspection Completed Date: November 18, 2014

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**
**FOR PARCELS I8-24-1, I7-21-2 & -103, I8-23-103, AND I8-23-4 WITHIN 1.5 MILE REACH**

**PARCEL NUMBER** I8-23-103

**DOCUMENT REVIEW**

Conducted By: Paolo Filippetti (ARCADIS) Phone Number: 585-662-4035
Representing: GE Review Start Date: November 3, 2014

1. [X] Check here to confirm that the description of the Conditional Solution for this property in the Final Completion Report, and the as-built drawings covering this property included in Final Completion Report (and any alternative plan proposed by GE for the comparison described in Item 5 on next page), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree have been reviewed.

2. [X] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds for this property have been reviewed.

3. Has there been a change in ownership of this property?
   - [X] No
   - [ ] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

4. Review Completed: November 18, 2014

**VISUAL ON-SITE INSPECTION**

Conducted By: Gregg Rabasco (ARCADIS) Phone Number: 413-822-1184
Representing: GE Inspection Start Date: November 18, 2014

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental/EPA

2. Is there any visual evidence of changes in activities and uses of the riverbank portion of the property since the last Conditional Solution inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented? (i.e., recreational use)?
   - [X] No
   - [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the riverbank portion of the property since the last Conditional Solution inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**
**FOR PARCELS I8-24-1, I7-21-2 & -103, I8-23-103, AND I8-23-4 WITHIN 1.5 MILE REACH**

4. Is there any visual evidence of excavations, construction, or other activities or conditions since the last Conditional Solution inspection that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the riverbank portion of the property?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. If any of the conditions listed in the response to Questions 3 and 4 appears likely to have altered the surface grade of the riverbank portion of the property compared with the as-built survey drawings included in the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the above-listed drawings and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

6. Inspection Completed Date: November 18, 2014

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**
**FOR PARCELS I8-24-1, I7-21-2 & -103, I8-23-103, AND I8-23-4 WITHIN 1.5 MILE REACH**

**PARCEL NUMBER** I8-23-4

**DOCUMENT REVIEW**

Conducted By: Paolo Filippetti (ARCADIS) Phone Number: 585-662-4035
Representing: GE Review Start Date: November 3, 2014

1. [X] Check here to confirm that the description of the Conditional Solution for this property in the Final Completion Report, and the as-built drawings covering this property included in Final Completion Report (and any alternative plan proposed by GE for the comparison described in Item 5 on next page), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree have been reviewed.

2. [X] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds for this property have been reviewed.

3. Has there been a change in ownership of this property?
   - [X] No
   - [ ] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

4. Review Completed: November 18, 2014

**VISUAL ON-SITE INSPECTION**

Conducted By: Gregg Rabasco (ARCADIS) Phone Number: 413-822-1184
Representing: GE Inspection Start Date: November 18, 2014

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental/EPA

2. Is there any visual evidence of changes in activities and uses of the riverbank portion of the property since the last Conditional Solution inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented? (i.e., recreational use)?
   - [X] No
   - [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the riverbank portion of the property since the last Conditional Solution inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**
**FOR PARCELS I8-24-1, I7-21-2 & -103, I8-23-103, AND I8-23-4 WITHIN 1.5 MILE REACH**

4. Is there any visual evidence of excavations, construction, or other activities or conditions since the last Conditional Solution inspection that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the riverbank portion of the property?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. If any of the conditions listed in the response to Questions 3 and 4 appears likely to have altered the surface grade of the riverbank portion of the property compared with the as-built survey drawings included in the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the above-listed drawings and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

6. Inspection Completed Date: November 18, 2014

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST FOR 1.5 MILE REACH**
**RIVERBANK PROPERTIES ABUTTING DEMING ST., ELM ST. BRIDGE , EAST BRANCH OF THE HOUSATONIC RIVER, AND I8-4-8 AND WITHIN CITY LAYOUT FOR HIGH STREET**

**PROPERTY IDENTIFICATION** Riverbank Property Abutting Deming St., Elm St. Bridge, East Branch of the Housatonic River, and I8-4-8

**DOCUMENT REVIEW**

Conducted By: Paolo Filippetti (ARCADIS) Phone Number: 585-662-4035
Representing: GE Review Start Date: November 3, 2014

1. [X] Check here to confirm that the description of the Conditional Solution for this property in the Final Completion Report, and the as-built drawings covering this property included in Final Completion Report (and any alternative plan proposed by GE for the comparison described in Item 5 on next page), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree have been reviewed.

2. [ ] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds have been reviewed to determine, to the extent possible based on those records whether there has been any transfer of ownership of this property.

3. Has there been a change in ownership of this property?
   - [ ] No
   - [ ] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

   A tax assessment card could not be obtained from the Pittsfield Assessor's Office since no parcel ID number has been assigned to this parcel, and title information could not be obtained from the Registry of Deeds since ownership is unclear. GE is unaware of any change in ownership of this property since the 2013 annual inspection.

4. Review Completed: November 18, 2014

**VISUAL ON-SITE INSPECTION**

Conducted By: Gregg Rabasco (ARCADIS) Phone Number: 413-822-1184
Representing: GE Inspection Start Date: November 18, 2014

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental/EPA

2. Is there any visual evidence of changes in activities and uses of the property since the last Conditional Solution inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented? (i.e., recreational use)?
   - [X] No
   - [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last Conditional Solution inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST FOR 1.5 MILE REACH**
**RIVERBANK PROPERTIES ABUTTING DEMING ST., ELM ST. BRIDGE , EAST BRANCH OF THE HOUSATONIC RIVER, AND I8-4-8 AND WITHIN CITY LAYOUT FOR HIGH STREET**

4. Is there any visual evidence of excavations, construction, or other activities or conditions since the last Conditional Solution inspection that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

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5. If any of the conditions listed in the response to Questions 3 and 4 appears likely to have altered the surface grade of the property compared with the as-built survey drawings included in the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the above-listed drawings and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

6. Inspection Completed Date: November 18, 2014

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST FOR 1.5 MILE REACH**
**RIVERBANK PROPERTIES ABUTTING DEMING ST., ELM ST. BRIDGE , EAST BRANCH OF THE HOUSATONIC RIVER, AND I8-4-8**
**AND WITHIN CITY LAYOUT FOR HIGH STREET**

**PROPERTY IDENTIFICATION** Riverbank Property Within City Layout for High Street

**DOCUMENT REVIEW**

Conducted By: Paolo Filippetti (ARCADIS) Phone Number: 585-662-4035
Representing: GE Review Start Date: November 3, 2014

1. [X] Check here to confirm that the description of the Conditional Solution for this property in the Final Completion Report, and the as-built drawings covering this property included in Final Completion Report (and any alternative plan proposed by GE for the comparison described in Item 5 on next page), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree have been reviewed.

2. [ ] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds have been reviewed to determine, to the extent possible based on those records whether there has been any transfer of ownership of this property.

3. Has there been a change in ownership of this property?
   - [ ] No
   - [ ] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

   A tax assessment card could not be obtained from the Pittsfield Assessor's Office since no parcel ID number has been assigned to this parcel, and title information could not be obtained from the Registry of Deeds since ownership is unclear. GE is unaware of any change in ownership of this property since the 2013 annual inspection.

4. Review Completed: November 18, 2014

**VISUAL ON-SITE INSPECTION**

Conducted By: Gregg Rabasco (ARCADIS) Phone Number: 413-822-1184
Representing: GE Inspection Start Date: November 18, 2014

1. List other individuals and their company/agency that were present during the visual on-site inspection.
   Izabela Zapisek - Avatar Environmental/EPA

2. Is there any visual evidence of changes in activities and uses of the property since the last Conditional Solution inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented? (i.e., recreational use)?
   - [X] No
   - [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last Conditional Solution inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST FOR 1.5 MILE REACH**
**RIVERBANK PROPERTIES ABUTTING DEMING ST., ELM ST. BRIDGE , EAST BRANCH OF THE HOUSATONIC RIVER, AND I8-4-8 AND WITHIN CITY LAYOUT FOR HIGH STREET**

4. Is there any visual evidence of excavations, construction, or other activities or conditions since the last Conditional Solution inspection that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

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5. If any of the conditions listed in the response to Questions 3 and 4 appears likely to have altered the surface grade of the property compared with the as-built survey drawings included in the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade shown on the above-listed drawings and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

6. Inspection Completed Date: November 18, 2014

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**

**LYMAN STREET AREA REMOVAL ACTION**

**PARCEL NUMBER** I9-4-14 (including riverbank)

**DOCUMENT REVIEW**

Conducted By: Paolo Filippetti, ARCADIS Representing: GE

Review Start Date: 11/10/2014

1. [X] Check here to confirm that the description of the Conditional Solution in the Final RD/RA Work Plan, applicable as-built survey drawing included in Appendix D of the Final Completion Report (or, if available, a more current drawing of the surface grade of the property), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree, have been reviewed.

2. [X] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds for the property have been reviewed.

3. Has there been a change in ownership of this property?
   - [X] No
   - [ ] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

4. Review Completed Date: 11/16/2014

**VISUAL SITE INSPECTION**

Conducted By: Gregg Rabasco, ARCADIS Representing: GE

Inspection Start Date: 11/17/2014

1. List other individuals and their company/agency that were present during the visual site inspection.
   Izabela Zapisek - Avatar Environmental

2. Is there any visual evidence of changes in activities and uses of the property since the last inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented?
   - [X] No
   - [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**

**LYMAN STREET AREA REMOVAL ACTION**

4. Is there any visual evidence of excavations, construction, or other activities or conditions that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

[X] No

[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

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5. If any of the conditions listed in the responses to Questions 3 and 4 appears to have altered the surface grade of the property compared to the surface grade shown on the applicable as-built survey drawing included in Appendix D of the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade changes on a plan and compare the new surface grade in such area(s) to the surface grade in the above-listed drawing and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

6. Inspection Completed Date 11/17/2014

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**

**LYMAN STREET AREA REMOVAL ACTION**

**PARCEL NUMBER** I9-4-19 (including riverbank)

**DOCUMENT REVIEW**

Conducted By: Paolo Filippetti, ARCADIS Representing: GE

Review Start Date: 11/10/2014

1. [X] Check here to confirm that the description of the Conditional Solution in the Final RD/RA Work Plan, applicable as-built survey drawing included in Appendix D of the Final Completion Report (or, if available, a more current drawing of the surface grade of the property), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree, have been reviewed.

2. [X] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds for the property have been reviewed.

3. Has there been a change in ownership of this property?
   - [X] No
   - [ ] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

4. Review Completed Date: 11/16/2014

**VISUAL SITE INSPECTION**

Conducted By: Gregg Rabasco, ARCADIS Representing: GE

Inspection Start Date: 11/17/2014

1. List other individuals and their company/agency that were present during the visual site inspection.
   Izabela Zapisek - Avatar Environmental

2. Is there any visual evidence of changes in activities and uses of the property since the last inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented?
   - [X] No
   - [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**

**LYMAN STREET AREA REMOVAL ACTION**

4. Is there any visual evidence of excavations, construction, or other activities or conditions that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

[X] No

[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

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5. If any of the conditions listed in the responses to Questions 3 and 4 appears to have altered the surface grade of the property compared to the surface grade shown on the applicable as-built survey drawing included in Appendix D of the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade changes on a plan and compare the new surface grade in such area(s) to the surface grade in the above-listed drawing and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

6. Inspection Completed Date 11/17/2014

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**

**LYMAN STREET AREA REMOVAL ACTION**

**PARCEL NUMBER** I9-4-201 (Sub-Area 201B and riverbank)

**DOCUMENT REVIEW**

Conducted By: Paolo Filippetti, ARCADIS Representing: GE

Review Start Date: 11/10/2014

1. [X] Check here to confirm that the description of the Conditional Solution in the Final RD/RA Work Plan, applicable as-built survey drawing included in Appendix D of the Final Completion Report (or, if available, a more current drawing of the surface grade of the property), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree, have been reviewed.

2. [X] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds for the property have been reviewed.

3. Has there been a change in ownership of this property?
   - [ ] No
   - [X] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

   Based on its recent records review, GE learned that, in November 2013, Philip E. Massery conveyed title to this property to the Philip E. Massery Family Irrevocable Trust (Michael P. Massery and Michelle R. Massery, as Trustees), by a deed recorded in the Berkshire Middle District Registry of Deeds on November 8, 2013 in Book 5296, Page 316. The address of this Trust is 308 Barker Road, Pittsfield, MA 01201. GE sent a Conditional Solution Notification letter to this Trust, as the new owner, on December 15, 2014.

4. Review Completed Date: 11/16/2014

**VISUAL SITE INSPECTION**

Conducted By: Gregg Rabasco, ARCADIS Representing: GE

Inspection Start Date: 11/17/2014

1. List other individuals and their company/agency that were present during the visual site inspection.
   Izabela Zapisek - Avatar Environmental

2. Is there any visual evidence of changes in activities and uses of the property since the last inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented?
   - [X] No
   - [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**

**LYMAN STREET AREA REMOVAL ACTION**

4. Is there any visual evidence of excavations, construction, or other activities or conditions that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

[X] No

[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

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5. If any of the conditions listed in the responses to Questions 3 and 4 appears to have altered the surface grade of the property compared to the surface grade shown on the applicable as-built survey drawing included in Appendix D of the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade changes on a plan and compare the new surface grade in such area(s) to the surface grade in the above-listed drawing and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

6. Inspection Completed Date 11/17/2014

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**

**LYMAN STREET AREA REMOVAL ACTION**

**PARCEL NUMBER** I9-4-203 (including riverbank)

**DOCUMENT REVIEW**

Conducted By: Paolo Filippetti, ARCADIS Representing: GE

Review Start Date: 11/10/2014

1. [X] Check here to confirm that the description of the Conditional Solution in the Final RD/RA Work Plan, applicable as-built survey drawing included in Appendix D of the Final Completion Report (or, if available, a more current drawing of the surface grade of the property), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree, have been reviewed.

2. [X] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds for the property have been reviewed.

3. Has there been a change in ownership of this property?
   - [X] No
   - [ ] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

4. Review Completed Date: 11/16/2014

**VISUAL SITE INSPECTION**

Conducted By: Gregg Rabasco, ARCADIS Representing: GE

Inspection Start Date: 11/17/2014

1. List other individuals and their company/agency that were present during the visual site inspection.
   Izabela Zapisek - Avatar Environmental

2. Is there any visual evidence of changes in activities and uses of the property since the last inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented?
   - [X] No
   - [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**

**LYMAN STREET AREA REMOVAL ACTION**

4. Is there any visual evidence of excavations, construction, or other activities or conditions that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

[X] No

[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

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5. If any of the conditions listed in the responses to Questions 3 and 4 appears to have altered the surface grade of the property compared to the surface grade shown on the applicable as-built survey drawing included in Appendix D of the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade changes on a plan and compare the new surface grade in such area(s) to the surface grade in the above-listed drawing and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

6. Inspection Completed Date 11/17/2014

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**

**LYMAN STREET AREA REMOVAL ACTION**

**PARCEL NUMBER** I9-4-25/-202 (including riverbank)

**DOCUMENT REVIEW**

Conducted By: Paolo Filippetti, ARCADIS Representing: GE

Review Start Date: 11/10/2014

1. [X] Check here to confirm that the description of the Conditional Solution in the Final RD/RA Work Plan, applicable as-built survey drawing included in Appendix D of the Final Completion Report (or, if available, a more current drawing of the surface grade of the property), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree, have been reviewed.

2. [X] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds for the property have been reviewed.

3. Has there been a change in ownership of this property?
   - [X] No
   - [ ] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

4. Review Completed Date: 11/16/2014

**VISUAL SITE INSPECTION**

Conducted By: Gregg Rabasco, ARCADIS Representing: GE

Inspection Start Date: 11/17/2014

1. List other individuals and their company/agency that were present during the visual site inspection.
   Izabela Zapisek - Avatar Environmental

2. Is there any visual evidence of changes in activities and uses of the property since the last inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented?
   - [X] No
   - [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**

**LYMAN STREET AREA REMOVAL ACTION**

4. Is there any visual evidence of excavations, construction, or other activities or conditions that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

[X] No

[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

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5. If any of the conditions listed in the responses to Questions 3 and 4 appears to have altered the surface grade of the property compared to the surface grade shown on the applicable as-built survey drawing included in Appendix D of the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade changes on a plan and compare the new surface grade in such area(s) to the surface grade in the above-listed drawing and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

6. Inspection Completed Date 11/17/2014

## CONDITIONAL SOLUTION ANNUAL INSPECTION CHECK LIST FOR FORMER OXBOW AREAS A AND C

**PARCEL NUMBER** I8-23-6 (including riverbank)

**DOCUMENT REVIEW**

Conducted By: Paolo Filippetti, ARCADIS
Phone Number: (585) 662-4035
Representing: GE
Review Start Date: 11/10/2014

1. [X] Check here to confirm that the description of the Conditional Solution for this property in the Final Completion Report, the as-built survey drawings included in Appendix C of the Final Completion Report (and any alternative plan proposed by GE for the comparison described in Item 5 on next page), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree have been reviewed.

2. [X] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds for this property have been reviewed.

3. Has there been a change in ownership of this property?

   [X] No

   [ ] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

Note: Although there has not been a change in ownership of this property, GE learned in January 2014 that, in November 2013, B.D.C., Inc. entered into a long-term (99-year) Ground Sublease under which it leased a portion of this property (roughly comparable to the commercial portion of the property) from Barbalunga Enterprises, Inc., which in turn leased the property for the same period from the owner (103 Elm Street LLC, whose sole member is the President of Barbalunga Enterprises), and that B.D.C, Inc. had further purchased substantially all of the assets of Barbalunga Enterprises. The address of the long-term lessee is B.D.C., Inc., 7 Westview Road, Pittsfield, MA 01201, Attn. David T. Comalli, President. GE sent a Conditional Solution notification letter to B.D.C., Inc. on January 17, 2014.

4. Review Completed Date: 11/16/2014

**VISUAL SITE INSPECTION**

Conducted By: Gregg Rabasco, ARCADIS
Phone Number: (413) 822-1184
Representing: GE
Inspection Start Date: 11/17/2014

1. List other individuals and their company/agency that were present during the visual site inspection.
   Izabela Zapisek - Avatar Environmental

2. Is there any visual evidence of changes in activities and uses of the property since the last inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented?

   [X] No

   [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last inspection?

   [X] No

   [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

## CONDITIONAL SOLUTION ANNUAL INSPECTION CHECK LIST FOR FORMER OXBOW AREAS A AND C

4. Is there any visual evidence of excavations, construction, or other activities or conditions that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan.

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5. If any of the conditions listed in the responses to Questions 3 and 4 appears to have altered the surface grade of the property compared to the surface grade shown on the as-built survey drawings included in Appendix C of the Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade in the above-listed drawings and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.)

6. Inspection Completed Date: 11/17/2014

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**

**HOUSATONIC RIVER - 1.5 MILE REACH AND**
**ADJACENT NON-RESIDENTIAL FLOODPLAIN PROPERTIES**

**PARCEL I7-1-5 (including riverbank)**

## DOCUMENT REVIEW

Conducted By: Paolo Filippetti, ARCADIS  Phone Number: (585) 662-4035
Representing: GE  Review Start Date: 11/10/2014

1. [X] Check here to confirm that the description of the Conditional Solution for this property in the *Final Completion Report for Removal Action for Housatonic River Floodplain-Non-Residential Properties* (Floodplain Non-Residential Final Completion Report) and the *Final Completion Report: 1½ Mile Reach Removal Action,* the relevant as-built survey drawings included therein (and any alternative plan proposed by GE for the comparison described in Item 5 on next page), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree have been reviewed and are available for review in the field during the inspection.

2. [X] Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office and the property deed at the Berkshire Middle District Registry of Deeds for this property have been reviewed

3. Has there been a change in ownership of this property?
   - [X] No
   - [ ] Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

4. Review Completed Date: 11/17/2014

## VISUAL SITE INSPECTION

Conducted By: Gregg Rabasco, ARCADIS  Phone Number: (413) 822-1184
Representing: GE  Inspection Start Date: 11/18/2014

1. List other individuals and their company/agency that were present during the visual site inspection
   Izabela Zapisek - Avatar Environmental

2. Is there any visual evidence of changes in activities and uses of the property since the last inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented (i.e., recreational use)?
   - [X] No
   - [ ] Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last inspection?
   - [X] No
   - [ ] Yes - If yes, describe below and show the location(s) of such activity on a plan

**CONDITIONAL SOLUTION ANNUAL INSPECTION CHECKLIST**

**HOUSATONIC RIVER - 1.5 MILE REACH AND**
**ADJACENT NON-RESIDENTIAL FLOODPLAIN PROPERTIES**

**PARCEL I7-1-5 (including riverbank)**

4. Is there any visual evidence of excavations, construction, or other activities or conditions that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

[X] No
[ ] Yes - If yes, describe below and show the location(s) of such activity on a plan

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5. If any of the conditions listed in the responses to Questions 3 and 4 appears to have altered the surface grade of the property compared to the surface grade shown on the relevant survey drawing included in the Floodplain Non-Residential Final Completion Report (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade in the above-listed drawings and/or plan. (If GE proposes use of an alternative plan for this comparison, include a copy of that plan and describe the rationale for its proposed use.

6. Inspection Completed Date 11/18/2014

## Appendix B

Surface Water Monitoring Data Validation Report

**Appendix B**
**Surface Water Monitoring Data Validation Report – 2014 Surface Water Monitoring Program**
**1½ Mile Reach of the Housatonic River**

**General Electric Company**
**Pittsfield, Massachusetts**

## 1.0 General

This appendix summarizes the data validation review performed on behalf of the General Electric Company (GE) for surface water samples collected from January through December 2014 as part of 1½ Mile Reach sampling activities conducted at the GE Pittsfield/Housatonic River Site in Pittsfield, Massachusetts. The samples were analyzed for polychlorinated biphenyls (PCBs) and other constituents by Pace Analytical (formerly Northeast Analytical, Inc. (NEA)) of Schenectady, New York. Data validation was performed for 24 PCB samples, six particulate organic carbon (POC) samples, 24 total suspended solids (TSS) samples, and three volatile suspended solids (VSS) samples.

## 2.0 Data Evaluation Procedures

This appendix outlines the applicable quality control criteria utilized during the data review process and any deviations from those criteria. The data review was conducted in accordance with the following documents:

- *Field Sampling Plan/Quality Assurance Project Plan (*FSP/QAPP), General Electric Company, Pittsfield, Massachusetts, ARCADIS (Revision 5 submitted by GE on July 2, 2013 and approved by EPA on July 23, 2013)*;* and

- EPA Region I, *EPA-New England Data Validation Functional Guidelines for Evaluating Environmental Analyses* (July 1996, revised December 1996) (EPA Region I Guidelines).

The data were validated to Tier I and Tier II levels, as described below. Any deviations from the applicable quality control criteria utilized during the data review process are identified below. A tabulated summary of the Tier I/Tier II data review is presented in Table B-1. Each sample subject to evaluation is listed in Table B-1 to document that data review was performed. Samples that required data qualification are listed separately.

The following data qualifiers were used in this data evaluation:

J The compound was positively identified, but the associated numerical value is an estimated concentration. This qualifier is used when the data evaluation procedure identifies a deficiency in the data generation process. This qualifier is also used when a compound is detected at an estimated concentration less than the corresponding practical quantitation limit (PQL).

ND(PQL) The compound was analyzed for, but was not detected at the method detection limit. The sample PQL is presented in parentheses. Non-detect sample results are presented as ND(PQL) in this report for consistency with documents previously prepared for investigations conducted at the GE-Pittsfield/Housatonic River Site. [1]

[1] This project specific nomenclature differs from that in EPA guidance, which uses the qualifier U for non-detected compounds.

ND(PQL) J The compound was not detected above the reported sample PQL, but the sample PQL is estimated and may or may not represent the actual level of quantitation. Non-detect sample results that required this qualification are presented as ND(PQL) J in this report for consistency with documents previously prepared for investigations conducted at the GE-Pittsfield/Housatonic River Site. [2]

## 3.0 Data Validation Procedures

Section 7.5 of the revised FSP/QAPP states that all analytical data will be validated to a Tier I level following the procedures presented in the EPA Region I Guidelines. The Tier I review consisted of a completeness evidence audit, as outlined in the *EPA Region I CSF Completeness Evidence Audit Program* (EPA Region I, July 31, 1991), to ensure that laboratory data and documentation were present. In the event that data packages were determined to be incomplete, the missing information was requested from the laboratory. Upon completion of the Tier I review, the data packages complied with the EPA Region I Tier I data completeness requirements.

All analytical results from the surface water sampling activities described above were also subjected to a Tier II data review. The Tier II data review consisted of a review of data package summary forms for identification of quality assurance/quality control (QA/QC) deviations and qualification of the data according to the EPA Region I Guidelines. Additionally, field duplicates were examined for relative percent difference (RPD) compliance with the criteria specified in the FSP/QAPP. A tabulated summary of the samples subject to Tier I and Tier II data review is presented in the following table.

**Summary of Samples Subjected to Tier I and Tier II Data Validation**

| Parameter | Tier I Only | | | Tier I &Tier II | | | Total |
|---|---|---|---|---|---|---|---|
| | Samples | Duplicates | Blanks | Samples | Duplicates | Blanks | |
| PCBs | 0 | 0 | 0 | 24 | 0 | 0 | 24 |
| POCs | 0 | 0 | 0 | 6 | 0 | 0 | 6 |
| TSSs | 0 | 0 | 0 | 24 | 0 | 0 | 24 |
| VSSs | 0 | 0 | 0 | 3 | 0 | 0 | 3 |
| **Total** | **0** | **0** | **0** | **57** | **0** | **0** | **57** |

When qualification of the sample data was required, the sample results associated with a QA/QC parameter deviation were qualified in accordance with the procedures outlined in EPA Region I Guidelines. When the data validation process identified several quality control deficiencies, the cumulative effect of the various deficiencies was employed in assigning the final data qualifier. A summary of the QA/QC parameter deviations that resulted in data qualification is presented in Section 4 below.

## 4.0 Summary of QA/QC Parameter Deviations Requiring Data Qualification

This section provides a summary of the deviations from the applicable QA/QC criteria that resulted in qualification of results.

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[2] This project specific nomenclature differs from that in EPA guidance, which uses the qualifier UJ for non-detected compounds in this category.

Aroclor identification criteria require that the Aroclor pattern resemble that of the pattern established throughout the analysis of the standards of the target Aroclors. Sample data that did not match Aroclor patterns that were established through the analysis of target Aroclor standards were tentatively identified and qualified as estimated (J). The PCB compounds that did not meet Aroclor identification criteria and the number of samples qualified due to those deviations are presented in the following table.

**Compounds Qualified Due to Identification Deviations**

| Analysis | Compounds | Number of Affected Samples | Qualification |
|---|---|---|---|
| PCBs | Aroclor-1221 | 18 | J |
| | Aroclor-1242 | 2 | J |
| | Aroclor-1248 | 6 | J |
| | Total PCBs | 20 | J |

Surrogate compounds are analyzed with every organic sample to aid in evaluation of the sample extraction efficiency. As specified in the FSP/QAPP, both of the PCB surrogate compounds must have a recovery within laboratory-specified control limits. Sample results less than control limits and greater than 10% were qualified as estimated (J or ND(PQL) J). A summary of the compounds affected by surrogate recovery exceedances and the number of samples qualified due to those deviations are presented in the following table.

**Compounds Qualified Due to Surrogate Recovery Deviations**

| Analysis | Compound | Number of Affected Samples | Qualification |
|---|---|---|---|
| PCBs | Aroclor-1016 | 23 | ND(PQL) J |
| | Aroclor-1221 | 6 | ND(PQL) J |
| | | 17 | J |
| | Aroclor-1232 | 23 | ND(PQL) J |
| | Aroclor-1242 | 1 | ND(PQL) J |
| | | 22 | J |
| | Aroclor-1248 | 6 | J |
| | | 17 | ND(PQL) J |
| | Aroclor-1254 | 1 | J |
| | | 22 | ND(PQL) J |
| | Aroclor-1260 | 23 | ND(PQL) J |
| | Total PCBs | 4 | ND(PQL) J |
| | | 19 | J |

Laboratory control sample/laboratory control sample duplicate (LCS/LCSD) analysis recovery criteria for PCBs be within 70% to 130%. The compounds that did not meet LCS/LCSD recovery criteria and the number of samples qualified due to those deviations are presented in the following table.

**Compounds Qualified Due to LCS/LCSD Deviations**

| Analysis | Compound | Number of Affected Samples | Qualification |
|---|---|---|---|
| PCBs | Aroclor-1016 | 2 | ND(PQL) J |
| | Aroclor-1221 | 1 | ND(PQL) J |
| | | 1 | J |
| | Aroclor-1232 | 2 | ND(PQL) J |
| | Aroclor-1242 | 2 | ND(PQL) J |
| | Aroclor-1248 | 2 | ND(PQL) J |
| | Aroclor-1254 | 2 | ND(PQL) J |
| | Aroclor-1260 | 2 | ND(PQL) J |
| | Total PCBs | 1 | J |
| | | 1 | ND(PQL) J |

Blank action levels for compounds/analytes detected in the blanks were calculated at five times the blank concentrations. Detected sample results that were below the blank action level were qualified as non-detect at the detected compound concentration (ND(DCC)), and the total PCB concentration was adjusted accordingly. The compounds detected in method/equipment blanks which resulted in qualification of sample data, along with the number of affected samples, are presented in the following table.

**Compounds Qualified Due to Blank Deviations**

| Analysis | Compound | Number of Affected Samples | Qualification |
|---|---|---|---|
| PCBs | Aroclor-1221 | 2 | ND(DCC) |
| | Total PCBs | 2 | Adjusted |

Organic technical holding time criteria require that the samples be preserved at <6°C. PCB samples that were not <6°C at time of receipt resulted in qualification of sample data as estimated (J or ND(PQL) J). The compounds/analyte that exceeded the temperature limit and the number of samples qualified due to deviations are presented in the following table.

**Compounds/Analyte Qualified Due to Temperature Deviations**

| Analysis | Compound/Analyte | Number of Affected Samples | Qualification |
|---|---|---|---|
| PCBs | Aroclor-1016 | 2 | ND(PQL) J |
| | Aroclor-1221 | 2 | J |
| | Aroclor-1232 | 2 | ND(PQL) J |
| | Aroclor-1242 | 2 | ND(PQL) J |
| | Aroclor-1248 | 1 | ND(PQL) J |
| | | 1 | J |
| | Aroclor-1254 | 2 | ND(PQL) J |
| | Aroclor-1260 | 2 | ND(PQL) J |
| | Total PCBs | 2 | J |
| Miscellaneous | Total Suspended Solids | 2 | J |

## 5.0 Overall Data Usability

This section summarizes the analytical data in terms of its completeness and usability. Data completeness is defined as the percentage of sample results that have been determined to be usable during the data validation

process. The percent usability calculation included analyses evaluated under both the Tier I/II data validation reviews. The percent usability calculation also includes quality control samples (i.e., field/equipment blanks, trip blanks, and field duplicates) to aid in the evaluation of data usability. Data usability is summarized in the following table.

**Data Usability**

| Parameter | Percent Usability | Rejected Data |
|---|---|---|
| PCBs | 100 | None |
| POC | 100 | None |
| TSS | 100 | None |
| VSS | 100 | None |

The data package completeness, as determined from the Tier I data review, was used in combination with the data quality deviations identified during the Tier II data review to determine overall data quality. As specified in the FSP/QAPP, the overall precision, accuracy, representativeness, comparability, and completeness (PARCC) parameters determined from the Tier I and Tier II data reviews were used as indicators of overall data quality. These parameters were assessed through an evaluation of the results of the field and laboratory QA/QC sample analyses to provide a measure of compliance of the analytical data with the Data Quality Objectives (DQOs) specified in the FSP/QAPP. The following sections present summaries of the PARCC parameters assessment with regard to the DQOs specified in the FSP/QAPP.

## 5.1 Precision

Precision measures the reproducibility of measurements under a given set of conditions. Specifically, it is a quantitative measure of the variability of a group of measurements compared to their average value. For this investigation, precision was defined as the RPD between duplicate sample results. The duplicate samples used to evaluate precision included LCS/LCSD samples. None of the data required qualification due to LCS/LCSD sample RPD deviations.

## 5.2 Accuracy

Accuracy measures the bias in an analytical system or the degree of agreement of a measurement with a known reference value. For this investigation, accuracy was defined as the percent recovery of QA/QC samples that were spiked with a known concentration of an analyte or compound of interest. The QA/QC samples used to evaluate analytical accuracy included instrument calibration, LCS/LCSD samples, and surrogate compound recoveries. For this analytical program, 7.1% of the data required qualification due to LCS/LCSD recovery deviations and 81.7% of the data required qualification due to surrogate compound recovery deviations. None of the data required qualification due to instrument calibration deviations.

## 5.3 Representativeness

Representativeness expresses the degree to which sample data accurately and precisely represents a characteristic of a population, parameter variations at a sampling point, or an environmental condition. Representativeness is a qualitative parameter, which is most concerned with the proper design of the sampling program. The representativeness criterion is best satisfied by making certain that sampling locations are selected properly and a sufficient number of samples are collected. This parameter has been addressed by collecting samples at locations specified in the EPA-approved work plans, and by following the

procedures for sample collection/analyses that were described in the FSP/QAPP. Additionally, the analytical program used procedures consistent with EPA-approved analytical methodology. A QA/QC parameter that is an indicator of the representativeness of a sample is temperature. Temperature criteria are established to maintain the samples in a state that deters compound/analyte loss and/or degradation prior to analysis. For this analytical data set, 8.0% of the data required qualification due to temperature deviations.

## 5.4 Comparability

Comparability is a qualitative parameter expressing the confidence with which one data set can be compared with another. This goal was achieved through the use of the standardized techniques for sample collection and analysis presented in the FSP/QAPP. Specifically, all the surface water samples collected between January and December 2014 were analyzed by EPA SW-846 Method 8082 for PCBs, 5310B for POCs, 2540D for TSSs, and 160.4 for VSSs.

## 5.5 Completeness

Completeness is defined as the percentage of measurements that are judged to be valid or usable to meet the prescribed DQOs. The completeness criterion is essentially the same for all data uses -- the generation of a sufficient amount of valid data. The actual completeness of this analytical data set was 100%.

**TABLE B-1**
**ANALYTICAL DATA VALIDATION SUMMARY**

**2014 ANNUAL MONITORING REPORT**
**1 1/2-MILE REACH OF THE HOUSATONIC RIVER**
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**
**(Results are presented in parts per million, ppm)**

| Sample Delivery Group No. | Sample ID | Date Collected | Matrix | Validation Level | Qualification | Compound | QA/QC Parameter | Value | Control Limits | Qualified Result | Notes |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **PCBs** | | | | | | | | | | | |
| 14010505_Rev00 | LOCATION-4 | 1/27/2014 | Water | Tier II | Yes | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.000081 J | |
| | | | | | | Aroclor-1242 | Aroclor 1242 tentatively identified | - | - | 0.00011 J | |
| | | | | | | Total PCBs | Aroclor 1221, 1242 tentatively identified | - | - | 0.000219 J | |
| 14010505_Rev00 | LOCATION-6A | 1/27/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery - DCB | 58.0% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 58.0% | 60% to 140% | 0.000013 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.000013 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 58.0% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 58.0% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 58.0% | 60% to 140% | 0.0000060 J | |
| | | | | | | Aroclor-1248 | Aroclor 1248 tentatively identified | - | - | 0.0000060 J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 58.0% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 58.0% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 58.0% | 60% to 140% | 0.000019 J | |
| | | | | | | Total PCBs | Aroclor 1221, 1248 tentatively identified | - | - | 0.000019 J | |
| 14020427_Rev00 | LOCATION-4 | 2/20/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery -TCMX,DCB | 45.8%, 9.77% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery -TCMX,DCB | 45.8%, 9.77% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery -TCMX,DCB | 45.8%, 9.77% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery -TCMX,DCB | 45.8%, 9.77% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery -TCMX,DCB | 45.8%, 9.77% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery -TCMX,DCB | 45.8%, 9.77% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery -TCMX,DCB | 45.8%, 9.77% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Total PCBs | Surrogate Recovery -TCMX,DCB | 45.8%, 9.77% | 60% to 140% | ND(0.000022) J | |
| 14020427_Rev00 | LOCATION-6A | 2/20/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery - DCB | 31.2% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 31.2% | 60% to 140% | 0.0000099 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.0000099 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 31.2% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 31.2% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 31.2% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 31.2% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 31.2% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 31.2% | 60% to 140% | 0.0000099 J | |
| | | | | | | Total PCBs | Aroclor 1221 tentatively identified | - | - | 0.0000099 J | |
| 14030528_Rev00 | LOCATION-4 | 3/27/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery - DCB | 33.6% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 33.6% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 33.6% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 33.6% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 33.6% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 33.6% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 33.6% | 60% to 140% | ND(0.000022) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 33.6% | 60% to 140% | ND(0.000022) J | |
| 14030528_Rev00 | LOCATION-6A | 3/27/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery - DCB | 25.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 25.9% | 60% to 140% | 0.0000089 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.0000089 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 25.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 25.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 25.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 25.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 25.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 25.9% | 60% to 140% | 0.0000089 J | |
| | | | | | | Total PCBs | Aroclor 1221 tentatively identified | - | - | 0.0000089 J | |
| 14040505_Rev00 | LOCATION-4 | 4/24/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery - DCB | 29.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 29.9% | 60% to 140% | 0.000031 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.000031 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 29.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 29.9% | 60% to 140% | 0.000049 J | |
| | | | | | | Aroclor-1242 | Aroclor 1242 tentatively identified | - | - | 0.000049 J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 29.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 29.9% | 60% to 140% | 0.0000061 J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 29.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 29.9% | 60% to 140% | 0.0000861 J | |
| | | | | | | Total PCBs | Aroclor 1221, 1242 tentatively identified | - | - | 0.0000861 J | |
| 14040505_Rev00 | LOCATION-6A | 4/24/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery - DCB | 31.0% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 31.0% | 60% to 140% | 0.0000099 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.0000099 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 31.0% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 31.0% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 31.0% | 60% to 140% | ND(0.0000055) J | |

**TABLE B-1**
**ANALYTICAL DATA VALIDATION SUMMARY**

**2014 ANNUAL MONITORING REPORT**
**1 1/2-MILE REACH OF THE HOUSATONIC RIVER**
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**
**(Results are presented in parts per million, ppm)**

| Sample Delivery Group No. | Sample ID | Date Collected | Matrix | Validation Level | Qualification | Compound | QA/QC Parameter | Value | Control Limits | Qualified Result | Notes |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **PCBs (continued)** | | | | | | | | | | | |
| 14040505_Rev00 | LOCATION-6A | 4/24/2014 | Water | Tier II | Yes | Aroclor-1254 | Surrogate Recovery - DCB | 31.0% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 31.0% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 31.0% | 60% to 140% | 0.0000099 J | |
| | | | | | | Total PCBs | Aroclor 1221 tentatively identified | - | - | 0.0000099 J | |
| 14050559_Rev00 | LOCATION-4 | 5/21/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery - DCB | 33.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 33.9% | 60% to 140% | 0.000019 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.000019 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 33.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 33.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 33.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 33.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 33.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 33.9% | 60% to 140% | 0.000019 J | |
| | | | | | | Total PCBs | Aroclor 1221 tentatively identified | - | - | 0.000019 J | |
| 14050559_Rev00 | LOCATION-6A | 5/21/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery - DCB | 33.4% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 33.4% | 60% to 140% | 0.000016 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.000016 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 33.4% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 33.4% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 33.4% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 33.4% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 33.4% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 33.4% | 60% to 140% | 0.000016 J | |
| | | | | | | Total PCBs | Aroclor 1221 tentatively identified | - | - | 0.000016 J | |
| 14061011_Rev00 | LOCATION-4 | 6/26/2014 | Water | Tier II | Yes | Aroclor-1016 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1016 | Surrogate Recovery - DCB | 24.8% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 24.8% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1232 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 24.8% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 24.8% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 24.8% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 24.8% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 24.8% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 24.8% | 60% to 140% | ND(0.0000055) J | |
| 14061011_Rev00 | LOCATION-6A | 6/26/2014 | Water | Tier II | Yes | Aroclor-1016 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1016 | Surrogate Recovery - DCB | 28.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | LCS %R | 66.5% | 70.0% to 130% | 0.0000088 J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 28.5% | 60% to 140% | 0.0000088 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.0000088 J | |
| | | | | | | Aroclor-1232 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 28.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 28.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 28.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 28.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | LCS %R | 66.5% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 28.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | LCS %R | 66.5% | 70.0% to 130% | 0.0000088 J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 28.5% | 60% to 140% | 0.0000088 J | |
| | | | | | | Total PCBs | Aroclor 1221 tentatively identified | - | - | 0.0000088 J | |
| 14070787_Rev00 | LOCATION-4 | 7/22/2014 | Water | Tier II | Yes | Aroclor-1016 | Temperature Receipt | 9.9 °C | <6 °C | ND(0.0000055) J | |
| | | | | | | Aroclor-1016 | Surrogate Recovery - DCB | 31.3% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Temperature Receipt | 9.9 °C | <6 °C | 0.000017 J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 31.3% | 60% to 140% | 0.000017 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.000017 J | |
| | | | | | | Aroclor-1232 | Temperature Receipt | 9.9 °C | <6 °C | ND(0.0000055) J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 31.3% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Temperature Receipt | 9.9 °C | <6 °C | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 31.3% | 60% to 140% | ND(0.0000055) J | |

**TABLE B-1**
**ANALYTICAL DATA VALIDATION SUMMARY**

**2014 ANNUAL MONITORING REPORT**
**1 1/2-MILE REACH OF THE HOUSATONIC RIVER**
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**
**(Results are presented in parts per million, ppm)**

| Sample Delivery Group No. | Sample ID | Date Collected | Matrix | Validation Level | Qualification | Compound | QA/QC Parameter | Value | Control Limits | Qualified Result | Notes |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **PCBs (continued)** | | | | | | | | | | | |
| 14070787_Rev00 | LOCATION-4 | 7/22/2014 | Water | Tier II | Yes | Aroclor-1248 | Temperature Receipt | 9.9 °C | <6 °C | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 31.3% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Temperature Receipt | 9.9 °C | <6 °C | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 31.3% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Temperature Receipt | 9.9 °C | <6 °C | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 31.3% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Temperature Receipt | 9.9 °C | <6 °C | 0.000017 J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 31.3% | 60% to 140% | 0.000017 J | |
| | | | | | | Total PCBs | Aroclor 1221 tentatively identified | - | - | 0.000017 J | |
| 14070787_Rev00 | LOCATION-6A | 7/22/2014 | Water | Tier II | Yes | Aroclor-1016 | Temperature Receipt | 9.9 °C | <6 °C | ND(0.0000055) J | |
| | | | | | | Aroclor-1016 | Surrogate Recovery - DCB | 26.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Temperature Receipt | 9.9 °C | <6 °C | 0.000016 J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 26.9% | 60% to 140% | 0.000016 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.000016 J | |
| | | | | | | Aroclor-1232 | Temperature Receipt | 9.9 °C | <6 °C | ND(0.0000055) J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 26.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Temperature Receipt | 9.9 °C | <6 °C | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 26.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Temperature Receipt | 9.9 °C | <6 °C | 0.0000077 J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 26.9% | 60% to 140% | 0.0000077 J | |
| | | | | | | Aroclor-1248 | Aroclor 1248 tentatively identified | - | - | 0.0000077 J | |
| | | | | | | Aroclor-1254 | Temperature Receipt | 9.9 °C | <6 °C | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 26.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Temperature Receipt | 9.9 °C | <6 °C | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 26.9% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Temperature Receipt | 9.9 °C | <6 °C | 0.0000237 J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 26.9% | 60% to 140% | 0.0000237 J | |
| | | | | | | Total PCBs | Aroclor 1221, 1248 tentatively identified | - | - | 0.0000237 J | |
| 14081662_Rev00 | LOCATION-4 | 8/27/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery - DCB | 44.6% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 44.6% | 60% to 140% | 0.000022 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.000022 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 44.6% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 44.6% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 44.6% | 60% to 140% | 0.0000080 J | |
| | | | | | | Aroclor-1248 | Aroclor 1248 tentatively identified | - | - | 0.0000080 J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 44.6% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 44.6% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 44.6% | 60% to 140% | 0.000030 J | |
| | | | | | | Total PCBs | Aroclor 1221, 1248 tentatively identified | - | - | 0.000030 J | |
| 14081662_Rev00 | LOCATION-6A | 8/27/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery - DCB | 34.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 34.5% | 60% to 140% | 0.000020 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.000020 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 34.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 34.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 34.5% | 60% to 140% | 0.0000068 J | |
| | | | | | | Aroclor-1248 | Aroclor 1248 tentatively identified | - | - | 0.0000068 J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 34.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 34.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 34.5% | 60% to 140% | 0.0000268 J | |
| | | | | | | Total PCBs | Aroclor 1221, 1248 tentatively identified | - | - | 0.0000268 J | |
| 14090897_Rev00 | LOCATION-4 | 9/25/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery -TCMX,DCB | 51.0%, 33.7% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery -TCMX,DCB | 51.0%, 33.7% | 70.0% to 130% | ND(0.000025) J | |
| | | | | | | Aroclor-1221 | Equipment Blank | - | - | ND(0.000025) | |
| | | | | | | Aroclor-1232 | Surrogate Recovery -TCMX,DCB | 51.0%, 33.7% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery -TCMX,DCB | 51.0%, 33.7% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery -TCMX,DCB | 51.0%, 33.7% | 70.0% to 130% | 0.000015 J | |
| | | | | | | Aroclor-1248 | Aroclor 1248 tentatively identified | - | - | 0.000015 J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery -TCMX,DCB | 51.0%, 33.7% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery -TCMX,DCB | 51.0%, 33.7% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery -TCMX,DCB | 51.0%, 33.7% | 70.0% to 130% | 0.000015 J | |
| | | | | | | Total PCBs | Aroclor 1248 tentatively identified | - | - | 0.000015 J | |
| | | | | | | Total PCBs | Equipment Blank | - | - | 0.000015 J | |
| 14090897_Rev00 | LOCATION-6A | 9/25/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery -TCMX,DCB | 55.9%, 32.1% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery -TCMX,DCB | 55.9%, 32.1% | 70.0% to 130% | ND(0.000018) J | |
| | | | | | | Aroclor-1221 | Equipment Blank | - | - | ND(0.000018) | |
| | | | | | | Aroclor-1232 | Surrogate Recovery -TCMX,DCB | 55.9%, 32.1% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery -TCMX,DCB | 55.9%, 32.1% | 70.0% to 130% | ND(0.0000055) J | |

**TABLE B-1**
**ANALYTICAL DATA VALIDATION SUMMARY**

**2014 ANNUAL MONITORING REPORT**
**1 1/2-MILE REACH OF THE HOUSATONIC RIVER**
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**
**(Results are presented in parts per million, ppm)**

| Sample Delivery Group No. | Sample ID | Date Collected | Matrix | Validation Level | Qualification | Compound | QA/QC Parameter | Value | Control Limits | Qualified Result | Notes |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **PCBs (continued)** | | | | | | | | | | | |
| 14090897_Rev00 | LOCATION-6A | 9/25/2014 | Water | Tier II | Yes | Aroclor-1248 | Surrogate Recovery -TCMX,DCB | 55.9%, 32.1% | 70.0% to 130% | 0.0000090 J | |
| | | | | | | Aroclor-1248 | Aroclor 1248 tentatively identified | - | - | 0.0000090 J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery -TCMX,DCB | 55.9%, 32.1% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery -TCMX,DCB | 55.9%, 32.1% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery -TCMX,DCB | 55.9%, 32.1% | 70.0% to 130% | 0.0000090 J | |
| | | | | | | Total PCBs | Aroclor 1248 tentatively identified | - | - | 0.0000090 J | |
| | | | | | | Total PCBs | Equipment Blank | - | - | 0.0000090 J | |
| 14110008_Rev00 | LOCATION-4 | 10/30/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery -TCMX,DCB | 50.3%, 35.0% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery -TCMX,DCB | 50.3%, 35.0% | 70.0% to 130% | 0.0000074 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.0000074 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery -TCMX,DCB | 50.3%, 35.0% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery -TCMX,DCB | 50.3%, 35.0% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery -TCMX,DCB | 50.3%, 35.0% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery -TCMX,DCB | 50.3%, 35.0% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery -TCMX,DCB | 50.3%, 35.0% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery -TCMX,DCB | 50.3%, 35.0% | 70.0% to 130% | 0.0000074 J | |
| | | | | | | Total PCBs | Aroclor 1221 tentatively identified | - | - | 0.0000074 J | |
| 14110008_Rev00 | LOCATION-6A | 10/30/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery -TCMX,DCB | 45.3%, 31.8% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery -TCMX,DCB | 45.3%, 31.8% | 70.0% to 130% | 0.0000066 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.0000066 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery -TCMX,DCB | 45.3%, 31.8% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery -TCMX,DCB | 45.3%, 31.8% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery -TCMX,DCB | 45.3%, 31.8% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery -TCMX,DCB | 45.3%, 31.8% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery -TCMX,DCB | 45.3%, 31.8% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery -TCMX,DCB | 45.3%, 31.8% | 70.0% to 130% | 0.0000066 J | |
| | | | | | | Total PCBs | Aroclor 1221 tentatively identified | - | - | 0.0000066 J | |
| 14110587_Rev00 | LOCATION-4 | 11/19/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery - DCB | 31.1% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 31.1% | 60% to 140% | 0.000011 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.000011 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 31.1% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 31.1% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 31.1% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 31.1% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 31.1% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 31.1% | 60% to 140% | 0.000011 J | |
| | | | | | | Total PCBs | Aroclor 1221 tentatively identified | - | - | 0.000011 J | |
| 14110587_Rev00 | LOCATION-6A | 11/19/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery -TCMX,DCB | 45.3%, 12.9% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery -TCMX,DCB | 45.3%, 12.9% | 70.0% to 130% | 0.000010 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.000010 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery -TCMX,DCB | 45.3%, 12.9% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery -TCMX,DCB | 45.3%, 12.9% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery -TCMX,DCB | 45.3%, 12.9% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery -TCMX,DCB | 45.3%, 12.9% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery -TCMX,DCB | 45.3%, 12.9% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery -TCMX,DCB | 45.3%, 12.9% | 70.0% to 130% | 0.000010 J | |
| | | | | | | Total PCBs | Aroclor 1221 tentatively identified | - | - | 0.000010 J | |
| 14120385_Rev00 | LOCATION-4 | 12/17/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery -TCMX,DCB | 56.3%, 25.4% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery -TCMX,DCB | 56.3%, 25.4% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery -TCMX,DCB | 56.3%, 25.4% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery -TCMX,DCB | 56.3%, 25.4% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery -TCMX,DCB | 56.3%, 25.4% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery -TCMX,DCB | 56.3%, 25.4% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery -TCMX,DCB | 56.3%, 25.4% | 70.0% to 130% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery -TCMX,DCB | 56.3%, 25.4% | 70.0% to 130% | ND(0.0000055) J | |
| 14120385_Rev00 | LOCATION-6A | 12/16/2014 | Water | Tier II | Yes | Aroclor-1016 | Surrogate Recovery - DCB | 33.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1221 | Surrogate Recovery - DCB | 33.5% | 60% to 140% | 0.0000068 J | |
| | | | | | | Aroclor-1221 | Aroclor 1221 tentatively identified | - | - | 0.0000068 J | |
| | | | | | | Aroclor-1232 | Surrogate Recovery - DCB | 33.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1242 | Surrogate Recovery - DCB | 33.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1248 | Surrogate Recovery - DCB | 33.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1254 | Surrogate Recovery - DCB | 33.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Aroclor-1260 | Surrogate Recovery - DCB | 33.5% | 60% to 140% | ND(0.0000055) J | |
| | | | | | | Total PCBs | Surrogate Recovery - DCB | 33.5% | 60% to 140% | 0.0000068 J | |
| | | | | | | Total PCBs | Aroclor 1221 tentatively identified | - | - | 0.0000068 J | |
| **POCs** | | | | | | | | | | | |
| 14010505_Rev00 | LOCATION-4 | 1/27/2014 | Water | Tier II | No | | | | | | |

**TABLE B-1**
**ANALYTICAL DATA VALIDATION SUMMARY**

**2014 ANNUAL MONITORING REPORT**
**1 1/2-MILE REACH OF THE HOUSATONIC RIVER**
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**
**(Results are presented in parts per million, ppm)**

| Sample Delivery Group No. | Sample ID | Date Collected | Matrix | Validation Level | Qualification | Compound | QA/QC Parameter | Value | Control Limits | Qualified Result | Notes |
|---|---|---|---|---|---|---|---|---|---|---|---|
| **POCs (continued)** | | | | | | | | | | | |
| 14010505_Rev00 | LOCATION-6A | 1/27/2014 | Water | Tier II | No | | | | | | |
| 14020427_Rev00 | LOCATION-4 | 2/20/2014 | Water | Tier II | No | | | | | | |
| 14020427_Rev00 | LOCATION-6A | 2/20/2014 | Water | Tier II | No | | | | | | |
| 14030528_Rev00 | LOCATION-4 | 3/27/2014 | Water | Tier II | No | | | | | | |
| 14030528_Rev00 | LOCATION-6A | 3/27/2014 | Water | Tier II | No | | | | | | |
| **TSSs** | | | | | | | | | | | |
| 14010505_Rev00 | LOCATION-4 | 1/27/2014 | Water | Tier II | No | | | | | | |
| 14010505_Rev00 | LOCATION-6A | 1/27/2014 | Water | Tier II | No | | | | | | |
| 14020427_Rev00 | LOCATION-4 | 2/20/2014 | Water | Tier II | No | | | | | | |
| 14020427_Rev00 | LOCATION-6A | 2/20/2014 | Water | Tier II | No | | | | | | |
| 14030528_Rev00 | LOCATION-4 | 3/27/2014 | Water | Tier II | No | | | | | | |
| 14030528_Rev00 | LOCATION-6A | 3/27/2014 | Water | Tier II | No | | | | | | |
| 14040505_Rev00 | LOCATION-4 | 4/24/2014 | Water | Tier II | No | | | | | | |
| 14040505_Rev00 | LOCATION-6A | 4/24/2014 | Water | Tier II | No | | | | | | |
| 14050559_Rev00 | LOCATION-4 | 5/21/2014 | Water | Tier II | No | | | | | | |
| 14050559_Rev00 | LOCATION-6A | 5/21/2014 | Water | Tier II | No | | | | | | |
| 14061011_Rev00 | LOCATION-4 | 6/26/2014 | Water | Tier II | No | | | | | | |
| 14061011_Rev00 | LOCATION-6A | 6/26/2014 | Water | Tier II | No | | | | | | |
| 14070787_Rev00 | LOCATION-4 | 7/22/2014 | Water | Tier II | Yes | Total Suspended Solids | Temperature Receipt | 9.9 °C | <6 °C | 1.40 J | |
| 14070787_Rev00 | LOCATION-6A | 7/22/2014 | Water | Tier II | Yes | Total Suspended Solids | Temperature Receipt | 9.9 °C | <6 °C | 1.20 J | |
| 14081662_Rev00 | LOCATION-4 | 8/27/2014 | Water | Tier II | No | | | | | | |
| 14081662_Rev00 | LOCATION-6A | 8/27/2014 | Water | Tier II | No | | | | | | |
| 14090897_Rev00 | LOCATION-4 | 9/25/2014 | Water | Tier II | No | | | | | | |
| 14090897_Rev00 | LOCATION-6A | 9/25/2014 | Water | Tier II | No | | | | | | |
| 14110008_Rev00 | LOCATION-4 | 10/30/2014 | Water | Tier II | No | | | | | | |
| 14110008_Rev00 | LOCATION-6A | 10/30/2014 | Water | Tier II | No | | | | | | |
| 14110587_Rev00 | LOCATION-4 | 11/19/2014 | Water | Tier II | No | | | | | | |
| 14110587_Rev00 | LOCATION-6A | 11/19/2014 | Water | Tier II | No | | | | | | |
| 14120385_Rev00 | LOCATION-4 | 12/17/2014 | Water | Tier II | No | | | | | | |
| 14120385_Rev00 | LOCATION-6A | 12/16/2014 | Water | Tier II | No | | | | | | |
| **VSSs** | | | | | | | | | | | |
| 14010505_Rev00 | LOCATION-6A | 1/27/2014 | Water | Tier II | No | | | | | | |
| 14020427_Rev00 | LOCATION-6A | 2/20/2014 | Water | Tier II | No | | | | | | |
| 14030528_Rev00 | LOCATION-6A | 3/27/2014 | Water | Tier II | No | | | | | | |