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PHASE II COMPREHENSIVE SITE ASSESSMENT SCOPE OF WORK

ELECTRIC POWER RESEARCH INSTITUTE
LENOX, MASSACHUSETTS

RTN 1-1083

November 29, 2000

Prepared for:

GENERAL ELECTRIC COMPANY
SCHENECTADY, NEW YORK

Prepared by:

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URS

December 4, 2000

Department of Environmental Protection
Western Regional Office
Bureau of Waste Site Cleanup
436 Dwight Street, 5th Floor
Springfield, Massachusetts 01103

RE: **Phase II Comprehensive Site Assessment Scope of Work**
Electric Power Research Institute
1000 Lenox Road
Lenox, Massachusetts
RTN 1-0001083

Dear Sir or Madam:

On behalf of our client, General Electric Company (GE), URS Corporation (URS) submits one copy of the *Phase II Comprehensive Site Assessment Scope of Work*, dated November 29, 2000 as required by Massachusetts Contingency Plan (MCP) regulations (310 CMR 40.0000).

Any questions may be directed to Mr. Edward Jamison of GE Power Systems at (518) 385-7979.

Sincerely,

Eriko Fujita
Project Manager

Don Porterfield, P.E.
Senior Engineer

cc: Edward F. Jamison, GE
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1.0 INTRODUCTION

On behalf of the General Electric Company (GE), Dames & Moore a division of URS Corporation (URS) has prepared this *Phase II Comprehensive Site Assessment Scope of Work (Phase II CSA Scope of Work)* for the Electric Power Research Institute (EPRI) *High Voltage Transmission Research Center* (HVTRC) in Lenox, Massachusetts for submission to the Massachusetts Department of Environmental Protection (DEP). An original Comprehensive Response Action Transmittal Form and Phase I Completion Statement (BWSC-108) is being submitted with this report. A copy of the completed form is included in Appendix A.

Since 1984, numerous environmental investigations have been completed at the EPRI site. Based on the results of these investigations, GE conducted various response actions to address the identified releases. The Release Tracking Number (RTN) for the EPRI property is 1-1083.

On July 31, 1998, GE submitted a *Phase I – Initial Site Investigation (Phase I-ISI) Report* for the EPRI property to the DEP. Based upon the results of the *Phase I-ISI*, a Tier Classification was prepared for the EPRI site in accordance with the MCP (310 CMR 40.0500). Based upon the information contained in the *Phase I Report*, a Numerical Ranking Score (NRS) of 304 was calculated for the site. The site does not meet any of the Tier I Inclusionary Criteria and an Imminent Hazard is not present. Thus, the EPRI site is classified as a Tier II site.

As per 310 CMR 40.0560(2) (b), GE must submit a *Phase II CSA Report,* and, if applicable, a *Phase III Remedial Action Plan* to the DEP within two years of Tier Classification. Thus, GE was to submit a *Phase II CSA Report,* and, if applicable, a *Phase III Remedial Action Plan* to the DEP by August 2, 2000. Correspondence from GE, dated August 13, 2000, was submitted to the DEP, stating that negotiations regarding the development of the *Phase II CSA Scope of Work* between GE, the past site owners, and EPRI, the current site owner, were nearing completion.

As specified in 310 CMR 40.0834, the *Phase II CSA Scope of Work* describes the scope and nature of investigative and sampling programs that GE will undertake to further characterize the source, extent, and migration pathways of the oil and hazardous materials that have been released

at the site. The *Phase II CSA Scope of Work* includes a risk assessment that will evaluate the potential impacts of oil and hazardous materials releases on health, safety, public welfare and the environment. The *Phase II CSA Scope of Work* also includes a schedule for the completion of the work.

Section 2.0 of this *Phase II CSA Scope of Work* provides background on the current site conditions of the EPRI site. Section 3.0 provides a description of the releases. Section 4.0 describes the objectives of the Phase II CSA. Section 5.0 describes the proposed tasks to complete the Phase II CSA. Section 6.0 provides a schedule for the implementation of the investigation, and Section 7.0 includes the certification of the LSP that this *Phase II CSA Scope of Work* meets the requirements of 310 CMR 40.0834.

2.0 CURRENT SITE CONDITIONS

This section describes the current site conditions including the location, site features, nearby natural resource areas, and geology and hydrogeology.

Site Location and Features

The EPRI property is located at 1000 East New Lenox Road in Berkshire County, in Lenox, Massachusetts. A small area at the northern end of the property lies within the corporate boundary of Pittsfield, Massachusetts. The property comprises about 40 acres and is approximately seven miles north of the Massachusetts Turnpike. The Universal Transverse Mercator coordinates of the EPRI site are 4,695,576.7 meters north and 64,514.6 meters east. The latitude and longitude of the EPRI site are N 42° 24' 03.6" and E 73° 14' 03.4". The location of the EPRI property is illustrated in Figure 1.

The HVTRC conducts research on high voltage electrical transmission equipment. In 1958, GE acquired the property and built the HVTRC. In 1985, GE gifted the property to EPRI. GE continued to operate the facility for EPRI, until late 1994. The site was operated by a corporation named J.A. Jones until early 1998, when EPRI assumed operational responsibilities.

Currently, the HVTRC tests insulator performance, flashover prevention, corona phenomena, and electrical and magnetic fields. Historically, the HVTRC conducted tests on capacitors and transformers.

Figure 2 is a generalized site map. The disposal site boundaries include only the EPRI property located east of the Housatonic River. As shown in Figure 2, the site includes six buildings: the headquarters building, the UHV Building (also known as the salt fog impact chamber), the EHV Building (also known as the aging chamber), a garage, a storage building, and the magnetic field test residence. The switchyard is west of the office building and includes dead-end towers, transformers, and an 23 kilovolt substation. North of the switchyard is a drainage ditch. A nichrome resistor is west of the switchyard. The central portion of the site contains transformers, towers, a direct current (DC) converter station, instrumentation trailers, an impulse generator, and a monopolar test cage.

The property is listed as Parcel No. 1 in the Lenox Tax Assessor's Map 34. The property is zoned residential 20-30-40. Properties adjacent to the site are zoned agricultural, residential, or State Wildlife Management area. Potable water is supplied to the EPRI site from the City of Pittsfield. Domestic sewage is collected in a septic tank, which drains to an onsite leach field.

The entrance to the access road for the site is on East New Lenox Road. However, general access to the EPRI site is restricted by a chain link fence with barbed wire. Therefore, the potential for unauthorized access to the site is low. Soil categories S-2 and S-3 are appropriate for the EPRI site.

Historically, GE had an easement for the area west of the Housatonic River, which was called the "bubble site" and used for testing. After testing at the bubble site was discontinued, the area was decommissioned such that only a concrete pad remains.

Topography

The topography of the site east of the Housatonic River slopes gently westward. Elevations at the site range from approximately 985 to 950 feet above the National Geodetic Vertical Datum (NGVD). The highest elevation near the site is the summit of Sykes Mountain, approximately one mile east-northeast of the site. The elevation of Sykes Mountain is approximately 1,700 feet NGVD.

Geology and Hydrogeology

The overburden deposits at the EPRI site are comprised of glacio-fluvial sediments of the Housatonic River valley, consisting of poorly sorted, fine- to coarse-grained silts and sands, with a trace of gravel. Bedrock has never been penetrated in the soil borings completed at the site, and the depth to the bedrock is uncertain.

According to the United States Geological Survey's *Bedrock Geological Map of Massachusetts (1983)*, the bedrock underlying the site is the Dalton Formation, which is a Cambrian muscovite-microcline quartzite and feldspathic quartzite, and the overlying Stockbridge Formation, which is a quartzose calcite and dolomite marble (Zen, 1983). The steep topography to the east of the site marks where large-scale Taconic-aged faulting thrust the Proterozoic Tyringham Gneiss and the Cambrian Cheshire Quartzite over the younger Dalton Formation that underlies the site (Zen, 1983).

At present, there are ten monitoring wells at the site. The locations of the wells are shown on Figure 3, which is a potentiometric map for the overburden at the EPRI site on December 10, 1997. The water table elevations ranged from 950 to 972 feet above mean sea level (approximately 4 to 14 feet below the ground surface). East of the Housatonic River, the groundwater generally flows southwest to west, toward the river.

The groundwater under the EPRI site is classified as category GW-2 and GW-3. Category GW-2 groundwater represents a potential source of vapors of oil and/or hazardous material to indoor air. Category GW-3 groundwater represents a potential source of discharge to surface water.

Natural Resource Areas

As shown in Figures 1 and 2, the Housatonic River flows along the western border of the EPRI property. Most of the property is within the 100-year floodplain of the Housatonic River. Four oxbows of the river are within 500 feet of the site. The river is not considered a Class A surface water body. An unnamed stream flows westward off of Sykes Mountain and passes within 500 feet of the site.

The DEP Bureau of Waste Site Cleanup Geographic Information Systems Site Scoring Map of the EPRI property is shown in Figure 4. Based on this map, there are no approved Zone II Interim Wellhead Protection Areas or public surface water supply areas. There are two protected open space areas within one-half mile of the site. As shown on Figure 1, these areas appear to be associated with the Housatonic River Valley State Wildlife Management Area. The first area is approximately 0.2 miles north of the site. The second area appears to border the southwestern portion of the site. The southern part of the property includes fresh water wetlands, as well as National Heritage and Endangered Species Program (NHESP) Wetlands Habitat. Finally, the Housatonic River is a fish habitat area.

3.0 DESCRIPTION OF RELEASES

In 1984, GE performed an investigation of the bubble site on the west side of the river. The 1984 bubble site investigation located twelve buried capacitors and a minor amount of PCB-impacted soils. The buried capacitors and the impacted soils were removed and disposed in the mid-1980's, and soil sampling results show that the area is no longer impacted with PCB concentrations above the soil standards specified in the MCP.

As of 1987, RTN 1-0114 was assigned to the bubble site, which was classified a "remedial" site by the DEP. In 1993, the DEP assigned no further action status to RTN 1-0114 and the bubble site will remain so, unless new information about the site becomes available. Therefore, the bubble site is not included in the disposal site that is the subject of the Phase II CSA.

The releases of oil and hazardous materials that are the subject of this *Phase II CSA Scope of Work* include:

- Releases of kerosene at the UHV Test Building.
- A release of volatile organic compounds (VOCs) near the EHV Test Building.
- A release of petroleum hydrocarbons at the dry well.
- A release of petroleum hydrocarbons and polychlorinated biphenyls (PCBs) to surface soils in the switchyard.
- An alleged release of PCBs to surface soils in the drainage ditch north of the switchyard.
- A release of PCBs to surface soils near MW-3 and the EHV Building.
- Potential releases associated with former underground storage tanks.

Each of these releases is described in Sections 3.1 to 3.7.

3.1 KEROSENE RELEASE AT UHV BUILDING

On July 20, 1992, a spill of kerosene to the soils outside the UHV Building was reported to the DEP, and RTN 1-1083 was assigned to the site. Under the supervision of DEP's Emergency Response division, GE immediately excavated and disposed approximately 20 cubic yards of

affected soils. On September 27, 1992, DEP issued a verbal notice of responsibility and closed the case in the Emergency Response division.

On June 24, 1993, an anonymous person phoned the DEP to report additional kerosene impact inside and outside the UHV Building. The DEP contacted GE regarding the anonymous report. On September 28, 1993, the EPRI site was listed as an unclassified, confirmed disposal site, subject to the transition provisions of the 1993 MCP. GE's subsequent response actions included:

- In October 1993, at GE's direction, Laidlaw Environmental Services, Inc. performed an investigation including groundwater sampling and soil sampling inside and outside the UHV Building;
- In January 1995, GE submitted a *Licensed Site Professional Evaluation Opinion (LEO)* to the DEP, indicating that continued remedial response actions would be required at the site. On the same date, GE submitted a *Release Abatement Measure Plan (RAM Plan)* prepared by Tighe & Bond to the DEP.

- On June 21, 1995, GE submitted a *RAM Plan Status Report* to the DEP.

- In January 1996, GE submitted a *RAM Completion Report and Completion Statement* to the DEP, documenting the excavation and offsite disposal of approximately 675 cubic yards of kerosene-impacted soil. The excavation of the soil was halted to avoid undermining the foundation of the UHV Building. Total petroleum hydrocarbon (TPH) concentrations in the remaining soils ranged up to 13,000 milligram per kilogram (mg/kg), and TPH concentrations in groundwater samples collected from temporary wellpoints ranged from not detected to 550,000 micrograms per liter (µg/L).

In 1997, on behalf of EPRI, Woodward-Clyde Consultants (WCC) installed two soil borings and two monitoring wells (WCMW-2 and WCMW-3) downgradient of the UHV Building. TPH and VOCs were not detected in two soil samples, which were collected at a depth near and above the water table.

TPH was not detected in the groundwater samples from WCMW-2 and WCMW-3 (detection limit 1 mg/L). VOCs were detected in the groundwater samples from WC-MW-2 and WC-MW-3, including various alkylbenzenes and naphthalene. The highest VOC concentration was naphthalene in the groundwater sample from WC-MW-3 at 36 µg/L. The concentrations of VOCs detected in the groundwater at WC-MW-2 and WCMW-3 did not exceed their corresponding GW-2 and GW-3 standards.

WCC split a groundwater sample from WCMW-3 with Dames & Moore. The concentrations of volatile petroleum hydrocarbon (VPH) and extractable petroleum hydrocarbon (EPH) detected in the groundwater sample from WC-MW-3 and their corresponding Massachusetts GW-2 and GW-3 standards were:

Analyte	Concentration (µg/L)	GW-2 Standard	GW-3 Standard
$C_5 - C_8$ Aliphatics	28.0	1,000	4,000
$C_9 - C_{12}$ Aliphatics	690	1,000	20,000
$C_9 - C_{18}$ Aliphatics	229	1,000	20,000
$C_{19} - C_{36}$ Aliphatics	77.0	NA	20,000
$C_9 - C_{10}$ Aromatics	690	5,000	4,000
$C_{11} - C_{22}$ Aromatics	179	50,000	30,000

The concentrations of VPH and EPH detected in the groundwater at WC-MW-3 did not exceed their corresponding GW-2 and GW-3 standards. No polychlorinated biphenyls (PCBs) were detected in the groundwater sample from WC-MW-3.

The *Phase II CSA Scope of Work* includes additional investigation of the kerosene release at the UHV Building.

3.2 VOCS IN GROUNDWATER NEAR THE EHV TEST BUILDING

In 1984, VOCs were detected in the groundwater at monitoring well MW-4 near the EHV Building. In November 1984, the groundwater sample from MW-4 had a trichloroethene (TCE) concentration of 2,100 µg/L and a trans-1,2-dichloroethene (trans-1,2-DCE) concentration of 44 µg/L. In December 1984, the groundwater at MW-4 was resampled and found to contain 360 µg/L of TCE, and trans-1,2-DCE was not detected. PCBs were not detected in the groundwater samples from MW-4.

In 1985, Geraghty & Miller installed three additional monitoring wells (MW-7, MW-8, and MW-9) and collected another round of groundwater samples. TCE was detected in three of the groundwater samples from wells downgradient of the EHV Test Building at concentrations of 13 µg/L (MW-8), 16 µg/L (MW-9), and 490 µg/L (MW-4). Trans-1,2-DCE was not detected in any of the samples. Geraghty & Miller's report stated that the probable source of VOCs was cleaning solvents which were used in a storage building upgradient of MW-4 during a two to three week period in 1980 or 1981.

Geraghty & Miller modeled the fate and transport of the TCE in the groundwater using simple hydrogeologic equations. They concluded that natural attenuation would prevent the TCE from reaching the Housatonic River at a significant concentration.

In December 1997, Dames & Moore and WCC collected a round of groundwater samples, which included the wells upgradient (MW-7) and downgradient (MW-4, MW-8, and MW-9) of the EHV Building. PCBs were not detected in any of the groundwater samples. Chlorinated VOCs were not observed in the groundwater samples collected in December 1997. Based on the analytical results, it appears that natural attenuation has caused the concentrations of chlorinated VOCs to decline substantially. The groundwater sample from MW-3 had 10 µg/L of methyl tert-butyl ether (MTBE), which was well below the Massachusetts GW-2 and GW-3 standards for MTBE.

The *Phase II CSA Scope of Work* includes an additional round of groundwater sampling to confirm the absence of VOCs in the groundwater near the EHV test building.

3.3 DRY WELL

Two floor drains in the storage building historically discharged to a dry well near the rear of the building. Oil-filled equipment was maintained in the garage and storage building, so petroleum products and other substances may have been released to the dry well. In 1993, GE sealed the floor drains with expandable rubber plugs.

On EPRI's behalf, WCC evaluated the potential environmental impact of the dry well. WCC estimated the volume of sediment in the dry well to be less than 2 cubic yards. In November 1997, WCC sampled the sediment in the dry well. The sediment sample from the dry well had a elevated concentration of TPH (53,000 mg/kg), and low concentrations of metals and VOCs.
In 1998, WCC installed a soil boring/monitoring well (WC-MW-1) to evaluate the shallow subsurface soils and the groundwater downgradient of the dry well. WCC collected a soil sample from soil boring WC-MW-1 from a depth near and above the water table. TPH and VOCs were not detected in the soil sample.

At GE's request, WCC split the groundwater sample from WC-MW-1 with Dames & Moore. PCBs, VOCs, and VPH were not detected in the groundwater sample from WC-MW-1. The groundwater sample from WC-MW-1 contained low concentrations of dissolved metals and EPH, which were well below the applicable MCP reportable concentrations. These data suggest that the lateral extent of environmental impacts near the dry well are limited.

GE plans to decommission the dry well under a Release Abatement Measure (RAM). A *RAM Plan* for the dry well will be submitted to the DEP under a separate cover.

3.4 AREA NEAR MW-3

In 1984, Geraghty & Miller investigated the soil quality near the EHV Test Building. Geraghty & Miller collected 36 surficial soil samples near the EHV Test Building for PCB analysis. PCBs

were not detected in 20 of the samples, and 15 of the samples had total PCB concentrations less than 1 mg/kg. One soil sample (SCC-57 from location S-7) had a total PCB concentration of 6.5 mg/kg.

In 1984, Geraghty & Miller also investigated the soil quality at an alleged subsurface disposal area near the leg of tower #2, which is near monitoring well MW-3. Geraghty & Miller advanced 13 soil borings and selected 12 soil samples for PCB analysis from either 0 to 2 feet bgs or 4 to 6 feet bgs. PCBs were not detected in 6 of the samples, and 5 of the samples had PCB concentrations less than 1 mg/kg. One soil sample (B2 from 0 to 2 feet bgs) had a total PCB concentration of 9.8 mg/kg.

In 1993, the alleged subsurface disposal area near Tower #2 was investigated again, in response to an anonymous phone call to DEP. GE retained Laidlaw Environmental Services to excavate five test pits in the area of Tower #2. The test pits were excavated under the supervision of DEP personnel. The excavated soils were monitored for organic vapors with a photoionization detector (PID), but no organic vapors were detected. No PCB-containing wastes were observed in the test pits. The DEP inspector requested that two composite soil samples of the excavated soils be submitted for laboratory analysis of PCBs. The PCB concentrations in the two composite soil samples were 0.029 and 1.3 mg/kg.

Additional investigation is not necessary for the area near MW-3. The existing data will be used for the risk assessment.

3.5 EQUIPMENT STAINING INCLUDING THE SWITCHYARD

Equipment containing PCBs has historically been used in discrete on-site areas. Stained equipment, concrete pads, and gravel have been observed in the switchyard, near the impulse generator, and near the transformer sheds and transformer storage areas. TPH were detected in three surface soil samples from the switchyard. During the implementation of an Interim Remedial Measure (IRM) which was conducted in 1998 and summarized in the *Phase I Initial Investigation Report*, dated July 30, 1998, GE removed approximately 11 cubic yards of

impacted soil. The areas in the switchyard were backfilled and the excavated soil was properly disposed offsite.

Based upon the results of the confirmatory soil sampling performed following the IRM, and the negligible impacts to groundwater, no further actions are warranted for the switchyard area. The existing data will be used for the risk assessment.

3.6 DRAINAGE DITCH NORTH OF SWITCHYARD

An allegation had been made of historical oil spillage in a drainage ditch near the fence line north of the switchyard. Two surface soil samples were collected in this area and analyzed for PCBs, VOCs, VPH, and EPH. Based upon low concentrations of detected constituents, it appears that the soil in this area has not been adversely impacted by an alleged spill.

This *Phase II CSA Scope of Work* includes the collection of additional soil samples to further evaluate the surface and subsurface soil quality in the drainage ditch. Both the historic and new data will be used for the risk assessment.

3.7 FORMER UNDERGROUND STORAGE TANKS

Former underground storage tanks (USTs) reportedly removed from the site include a 1,000-gallon UST formerly used for storage of gasoline and a 50-gallon UST formerly used for storage of compressor oil condensate. Subsurface soil was sampled near the two former USTs. Due to the low concentrations of TPH detected in soils associated with these USTs, additional investigation is not required for these areas.

4.0 OBJECTIVES

The overall objective of the Phase II investigation is to collect, develop, and evaluate sufficient information of sufficient quality to support conclusions and opinions regarding:

- The source, nature, extent, and potential impact of releases of oil and hazardous materials;
- The risk posed by the releases of oil and hazardous materials to health, safety, public welfare, and the environment; and
- Provide data to support a *Response Action Outcome*.

The Phase II investigation will include a site-specific Method 3 Risk Characterization.

The specific objectives of the Phase II CSA and Risk Characterization are to:

- Confirm previous petroleum hydrocarbon sampling results for the residual kerosene in soils by analyzing selected soil samples for VPH and EPH.
- Confirm previous sampling results for the low concentrations of VPH and EPH detected in the groundwater near the UHV Building and dry well.
- Conduct air sampling in the UHV Building to evaluate the risk posed by kerosene-contaminated soils and groundwater beneath the UHV Building to indoor air.
- Confirm previous sampling results for reduction of VOC impacts in the groundwater west of the EHV Building.
- Conduct additional soil sampling in the drainage ditch along the northern fence line to evaluate whether there is an environmental impact caused by the anecdotal accounts of the dumping of coffee-cans containing oil to the ground surface.

5.0 SCOPE OF WORK

The *Phase II CSA Scope of Work* includes these six tasks:

- Task 1 – Install additional soil borings around the UHV Building;
- Task 2 – Conduct indoor air sampling in the UHV Building;
- Task 3 – Collect additional soil samples from the drainage ditch;
- Task 4 – Groundwater monitoring;
- Task 5 – Perform Method 3 Risk Characterization; and
- Task 6 – Prepare *Phase II CSA Report.*

The remainder of this section describes the proposed Scope of Work for each of these six tasks.

5.1 TASK 1 – INSTALL ADDITIONAL SOIL BORINGS AROUND THE UHV BUILDING

The UHV Building is a ten-sided structure, approximately 86 feet high and 85 feet in diameter, and it has an earthen floor. In 1995, approximately 675 cubic yards of kerosene-contaminated soils were removed from inside and outside the UHV Building during implementation of a RAM. However, it was infeasible to remove the kerosene-contaminated soils adjacent to the foundation, due to the potential for undermining the building.

After implementation of the RAM, kerosene levels in the remaining soils and the groundwater were measured by analyzing soil and groundwater samples for TPH. A field screening method was used to measure TPH, and the results were compared with laboratory analysis for selected samples. Field screening data may not be used for a risk assessment under the MCP. Therefore,

GE will collect VPH/EPH data for soils and groundwater to further characterize site conditions near the UHV Building.

Soil Boring Installation

GE will install eight soil borings (DM-100 to DM-107) in and around the UHV Building to collect soil samples for characterizing the VPH/EPH concentrations in the soils. Figure 5 shows the locations of the proposed soil borings. The soil borings will be advanced using Geoprobe drilling equipment with a 4-foot long macrocore sampler. At each location, continuous soil samples will be collected, screened with a photoionization detector (PID), and described on a boring log. The soil borings will be advanced to approximately three feet below the water table, which is approximately 5 feet below the ground surface (bgs). When completed, the soil borings will be backfilled with bentonite or cement/bentonite grout. The locations of the new soil borings will be documented and plotted on the existing site base map.

Table 1 is a summary of the laboratory analyses to be performed on the proposed soil samples. Two soil samples for laboratory analysis will be selected from each of the eight soil borings, along with one duplicate and a matrix spike/matrix spike duplicate pair for a total of twenty soil samples. The soil samples will be selected for analyses based upon PID headspace readings, visual, olfactory, and textural signs of impacts, and stratigraphic position. In general, the surficial soil sample and the sampling interval that includes the water table will be selected for analyses. The soil samples will be analyzed for VPH/EPH using the DEP method.

Waste Management

Drilling spoils from the soil borings, will be drummed and stored onsite. If possible, the wastes will be recycled. An appropriate disposal location for the wastes will be selected based on the analytical results.

5.2 TASK 2 – CONDUCT INDOOR AIR SAMPLING IN THE UHV BUILDING

GE will design an indoor air sampling program for the UHV Building to fully characterize the potential for worker exposure to vapors from the kerosene release. A Certified Industrial Hygienist (CIH) will visit the EPRI site to evaluate the UHV Building and to interview EPRI personnel in detail regarding the work practices in the UHV Building. The number and location of air samples will be determined, based on the results of the site visit and interviews by the CIH. The indoor air sampling program will be developed to satisfy the requirements of the MCP.

The indoor air samples will be collected according to the sampling protocol developed by the CIH, and submitted for laboratory analysis of VPH and associated target compounds (benzene, toluene, ethylbenzene, xylenes, and naphthalene). GE anticipates that five indoor air samples will be collected over a period of two days. The number and frequency of the indoor air samples may be adjusted upward or downward, depending on the results of the site visit by the CIH.

5.3 TASK 3- COLLECT ADDITIONAL SOIL SAMPLES FROM THE DRAINAGE DITCH

The drainage ditch north of the switchyard is a potential area of concern that was introduced into the project scope based on anecdotal accounts of the dumping of coffee-cans containing oil to the ground surface. URS previously collected two surface soil samples from the area where the discharge allegedly occurred. The PCB and VPH/EPH data revealed that the concentration of only one petroleum fraction (C9 to C18 aliphatics, 1,380 mg/kg) in soil sample DMSS-1 exceeded the applicable MCP Method 1 S-1 soil standard (1,000 mg/kg). The average C9 to C18 aliphatics concentration in the two soil samples from the ditch was 1,064 mg/kg, which falls slightly above the S-1 standard.

URS believes that the application of a Method 3 Risk Assessment to the existing soils data would be sufficient to demonstrate a condition of no significant risk and facilitate a Class A-2 RAO. However, GE will expand the *Phase II CSA Scope of Work* and collect approximately four additional surface soil samples and four subsurface soil samples from the drainage ditch area. The soil samples will be analyzed for EPH.

GE will advance four soil borings (DM-108 to DM-111) using hand augers in the drainage ditch area to collect soil samples for characterizing EPH concentrations in the soils. Figure 5 shows the locations of the proposed borings. The soil borings will be advanced using hand augers to approximately five feet bgs. Soil samples will be collected, screened with a PID, and described on a boring log. When completed, the soil borings will be backfilled with the removed soil along with bentonite or cement/bentonite grout. The locations of the new borings will be documented and plotted on the existing site base map.

One surface soil (0 to 3 feet) sample and one subsurface soil (3 to 5 feet) sample from each of the four borings will be collected for laboratory analysis. As shown in Table 1, all eight soil samples will be analyzed for EPH using the DEP method.

5.4 TASK 4 – GROUNDWATER MONITORING

GE will perform groundwater monitoring at the EPRI site to provide appropriate data for the Risk Characterization. This task is designed to further evaluate the kerosene release at the UHV Building and the VOCs that were historically observed near the EHV Building. GE will sample eight of the monitoring wells at the EPRI site during the Phase II CSA.

GE will collect one synoptic round of water level measurements from the ten monitoring wells prior to sampling and a second round on a separate date after sampling. These data will be used to prepare potentiometric maps of the site.

The eight monitoring wells that will be sampled (MW-1, MW-2, MW-4, MW-8, MW-9, WCMW-1, WCMW-2, and WCMW-3) will be purged using the USEPA low-flow technique to minimize the entrainment of particulate matter in the samples. The field parameters of the groundwater will be measured at each well during each purging and sampling event. The field parameters will include pH, temperature, specific conductivity, and turbidity. Table 3 is a summary of the laboratory analyses for the proposed groundwater samples.

The groundwater samples from eight wells will be analyzed for EPH. In addition, the three existing wells downgradient of the UHV Building will be sampled for VPH. To evaluate the current status of the historic VOC impact, samples from existing monitoring wells MW-4, MW-8, and MW-9 will also be analyzed for VOCs.

Waste Management

Water that is purged from the monitoring wells before sampling will be drummed and stored onsite, pending the results of laboratory analysis. An appropriate disposal method for the groundwater will be selected based on the analytical results.

5.5 TASK 5 – PERFORM METHOD 3 RISK CHARACTERIZATION

The purpose of a Risk Characterization is to determine whether a remedial response action is necessary, and to document that a level of no significant risk of harm to health, safety, public welfare and the environment has been achieved at a disposal site. The MCP requires that a Risk Characterization be performed at each disposal site seeking a Response Action Outcome (RAO), which is the endpoint of response actions under the MCP.

The MCP specifies three types of Risk Characterization: Method 1, Method 2, and Method 3. Methods 1 and 2 rely on comparing disposal site contaminant concentrations to guidance levels published in the MCP. A Method 3 Risk Characterization uses site-specific information, particularly the potential for exposure to contaminants, to independently evaluate the risks of harm to health, public welfare, and the environment. The risk of harm to safety is evaluated in the same manner in Method 1, 2, and 3 Risk Characterizations.

A Method 3 Risk Characterization involves evaluation of the risk of harm to human health and to the environment. The human health risk assessment has five steps:

- Hazard identification;

- Dose-response assessment;
- Exposure assessment;
- Risk characterization; and
- Uncertainty analysis.

The MCP requires that a potential residential scenario be included in the Risk Characterization, to evaluate whether one or more Activity and Use Limitations would be required to maintain a condition of no significant risk at the site.

In a Method 3 Risk Characterization, the risk of harm to the environment is evaluated by performing a Stage 1 Environmental Screening. The objective of a Stage 1 Screening is to determine whether there is a need for a quantitative Stage II Environmental Risk Characterization.

During the Stage 1 Environmental Screening, the available data for the EPRI site will be evaluated to determine whether plants and/or animals are currently exposed, or could be potentially exposed, to impacts at or from the EPRI site. All potential exposure pathways will be considered to determine whether any pathways from the site are complete.

The groundwater at the site is classified as category GW-2 and GW-3. The Risk Assessment will consider the groundwater categories GW-2 and GW-3.

Currently, the analytical data for TPH obtained during the past investigations at the site cannot be used for the Risk Characterization. In order to complete a Method 3 Risk Characterization, the TPH results of previous investigations of soil and groundwater impacts must be confirmed using the VPH/EPH method.

5.6 TASK 6 – PREPARE PHASE II CSA REPORT

GE will prepare a *Phase II Comprehensive Site Assessment Report (Phase II CSA Report)* at the conclusion of the *Phase II CSA Scope of Work.* As required by 310 CMR 40.0835, elements of the *Phase II CSA Report* will be:

- Site name, location, and locus map;
- Detailed site map;
- Site history and, in particular, information concerning the use, storage, and disposal of oil and hazardous material at the facility;
- Site hydrogeological characteristics;
- Environmental fate and transport of oil and hazardous materials;
- Nature and extent of impacts;
- Exposure assessment;
- Risk Characterization; and
- Conclusions.

The results of the field investigation will be documented in tables and figures, including:

- Soil boring logs;
- Tables of soil, groundwater, and indoor air analyses;

- Geologic cross-sections; and

- Maps and cross-sections showing the groundwater flow.

In conjunction with the *Phase II CSA Report*, GE will submit a *Phase II Completion Statement* to the DEP. In accordance with 310 CMR 40.0836, *the Phase II Completion Statement* will include an opinion from the LSP that the Phase II CSA conforms with applicable Phase II requirements and any approval conditions specified by the DEP, and that the submittal meets the Phase II performance standards. The *Completion Statement* will specify the Phase II outcome under 310 CMR40.0840, and it will include the certification of the submittal required by 310 CMR 40.0009.

6.0 SCHEDULE

The proposed schedule for the *Phase II CSA Scope of Work* is presented below:

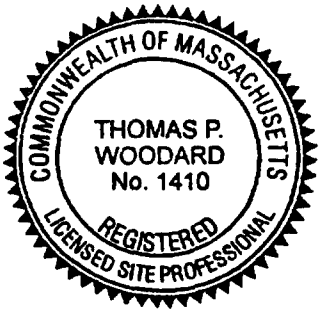
Task	Anticipated Completion Date in Weeks After Submittal of Scope of Work
Task 1 – Install additional soil borings around the UHV Building.	3
Task 2 – Conduct indoor air sampling in the UHV Building.	4
Task 3 – Collect additional soil samples from the drainage ditch.	3
Task 4 – Groundwater monitoring.	3
Task 5 – Perform Method 3 Risk Characterization.	9
Task 6 – Prepare Phase II CSA Report.	12

SEAL AND SIGNATURE OF THE LSP

The Licensed Site Professional (LSP) has reviewed this *Phase II CSA Scope of Work* and certifies that it meets the requirements of 310 CMR 40.0834.

Mr. Thomas Woodard, L.S.P.

(seal)



TABLES

TABLE 1
SUMMARY OF PROPOSED LABORATORY ANALYSES FOR SOILS

GENERAL ELECTRIC COMPANY
ELECTRIC POWER RESEARCH INSTITUTE
LENOX, MASSACHUSETTS

Sample Name	Area of Environmental Concern	Analyses	
		VPH/EPH	EPH only
DM-100-1	UHV Building	X	
DM-100-2	UHV Building	X	
DM-101-1	UHV Building	X	
DM-101-2	UHV Building	X	
DM-102-1	UHV Building	X	
DM-102-2	UHV Building	X	
DM-103-1	UHV Building	X	
DM-103-2	UHV Building	X	
DM-104-1	UHV Building	X	
DM-104-2	UHV Building	X	
DM-105-1	UHV Building	X	
DM-105-2	UHV Building	X	
DM-106-1	UHV Building	X	
DM-106-2	UHV Building	X	
DM-107-1	UHV Building	X	
DM-107-2	UHV Building	X	
DM-108-1	Drainage Ditch		X
DM-108-2	Drainage Ditch		X
DM-109-1	Drainage Ditch		X
DM-109-2	Drainage Ditch		X
DM-110-1	Drainage Ditch		X
DM-110-2	Drainage Ditch		X
DM-111-1	Drainage Ditch		X
DM-111-2	Drainage Ditch		X

Notes:
1. Volatile Petroleum Hydrocarbons (VPH) and Extractable Petroleum Hydrocarbons (EPH) collected by USEPA Method 5035 and analyzed by MADEP method.

TABLE 2
SUMMARY OF PROPOSED LABORATORY ANALYSES FOR GROUNDWATER

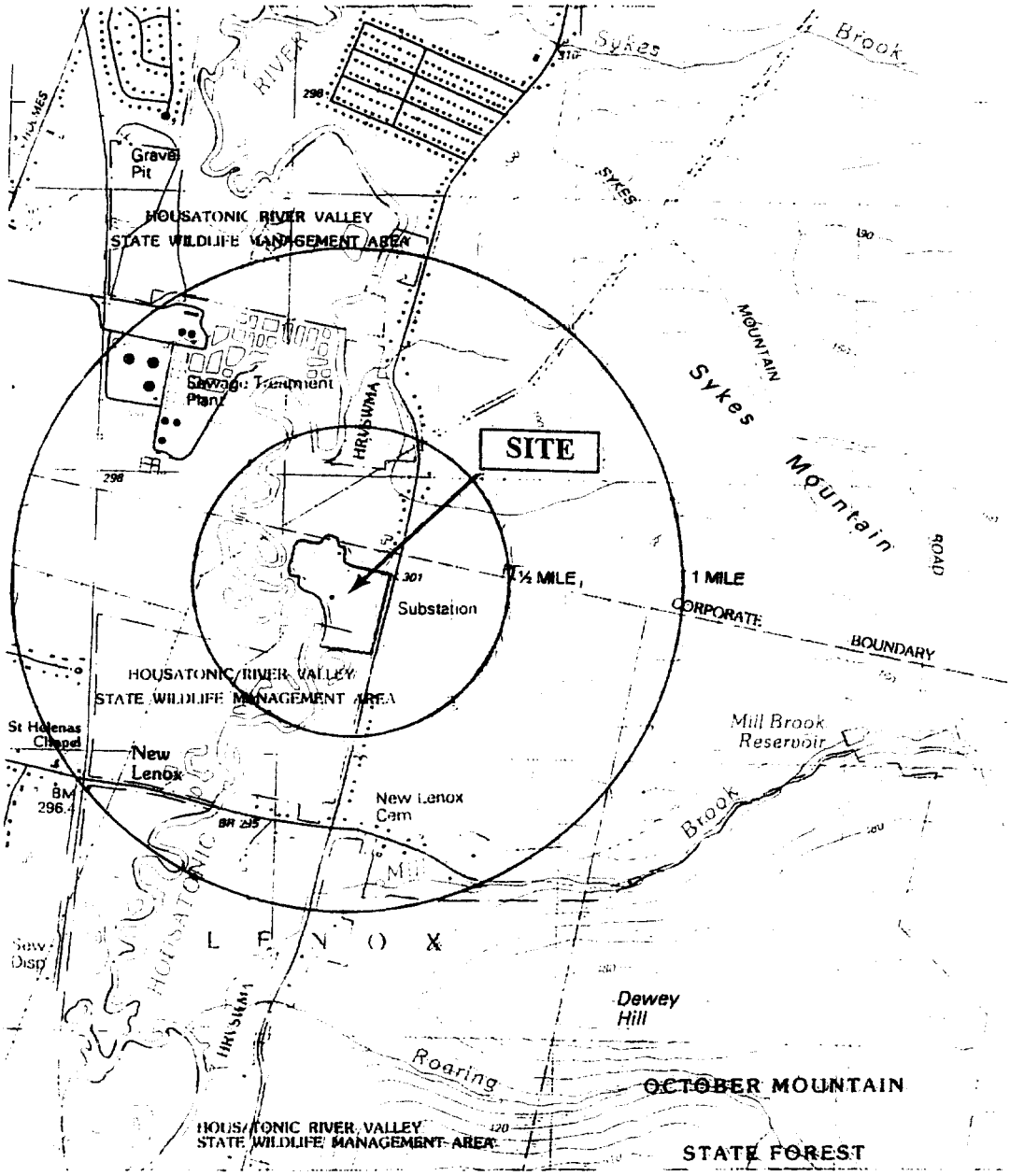
GENERAL ELECTRIC COMPANY
ELECTRIC POWER RESEARCH INSTITUTE
LENOX, MASSACHUSETTS

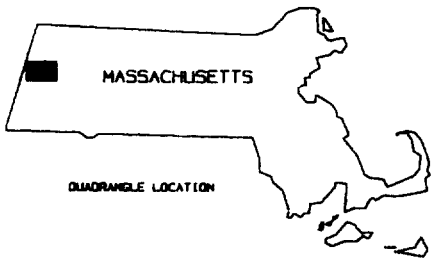
Sample Name	Area of Environmental Concern	Analyses		
		VPH[1]	EPH[1]	VOCs[2]
MW-1	Upgradient		X	
MW-2	UHV Building	X	X	
MW-4	VOCs in Groundwater			X
MW-8	VOCs in Groundwater			X
MW-9	VOCs in Groundwater			X
WC-MW-1	Dry Well		X	
WC-MW-2	UHV Building	X	X	
WC-MW-3	UHV Building	X	X	

Notes:

1. Volatile and Extractable Petroleum Hydrocarbons (VPH/EPH) analyzed by MADEP method.
2. Volatile Organic Compounds (VOCs) analyzed by USEPA Method 8260.

FIGURES





Originals in color

THE CIRCLES DEPICTED ARE THE ½ MILE AND 1 MILE RADII FROM THE UHV BUILDING

0 250 500 750 1,000

GRAPHIC SCALE (METERS)

N

NOTE:
CONTOUR INTERVAL = 6 METERS

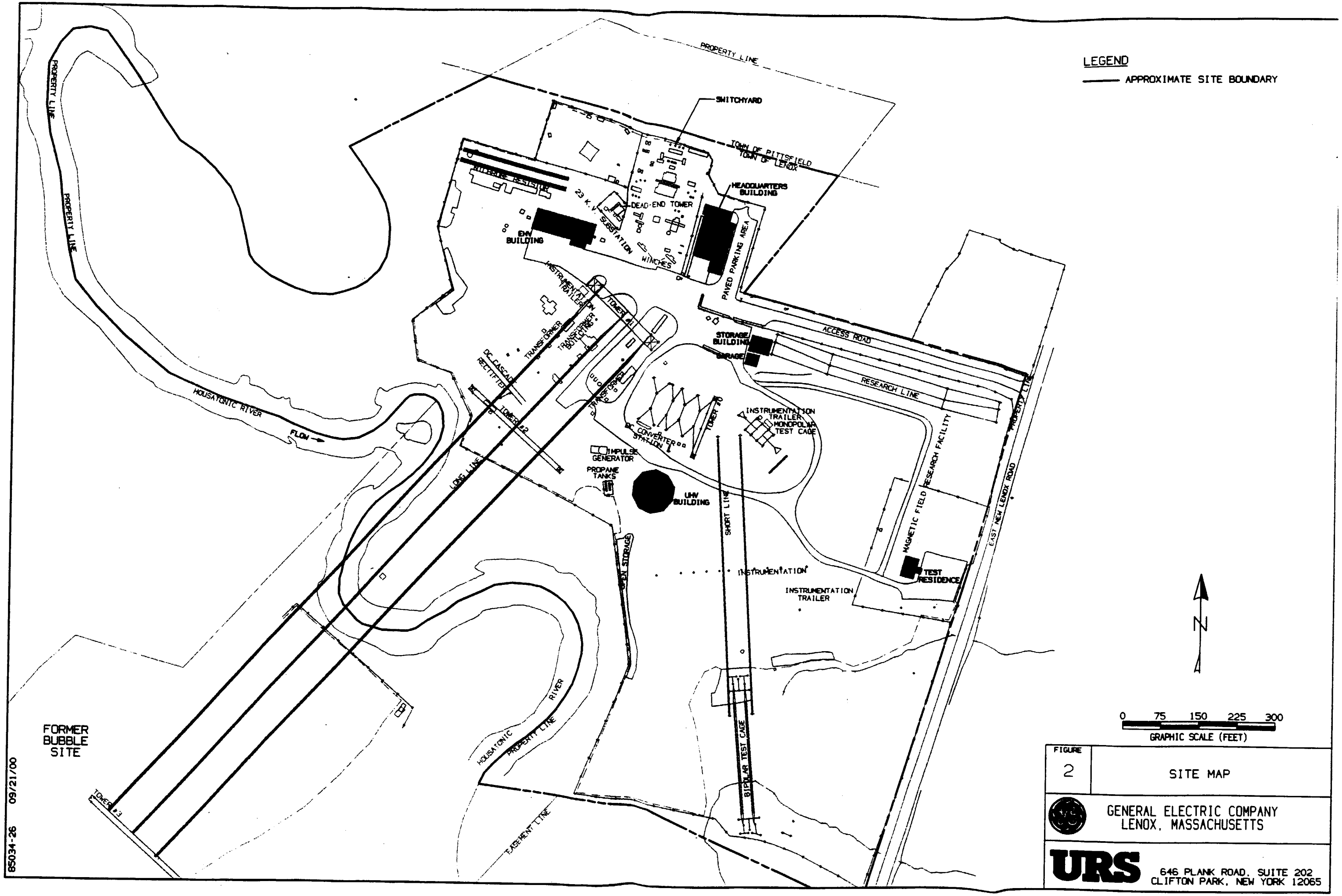
REFERENCE:
A PORTION OF 7.5x15-MINUTE TOPOGRAPHIC MAP
PITTSFIELD EAST QUADRANGLE, MASSACHUSETTS, 1990

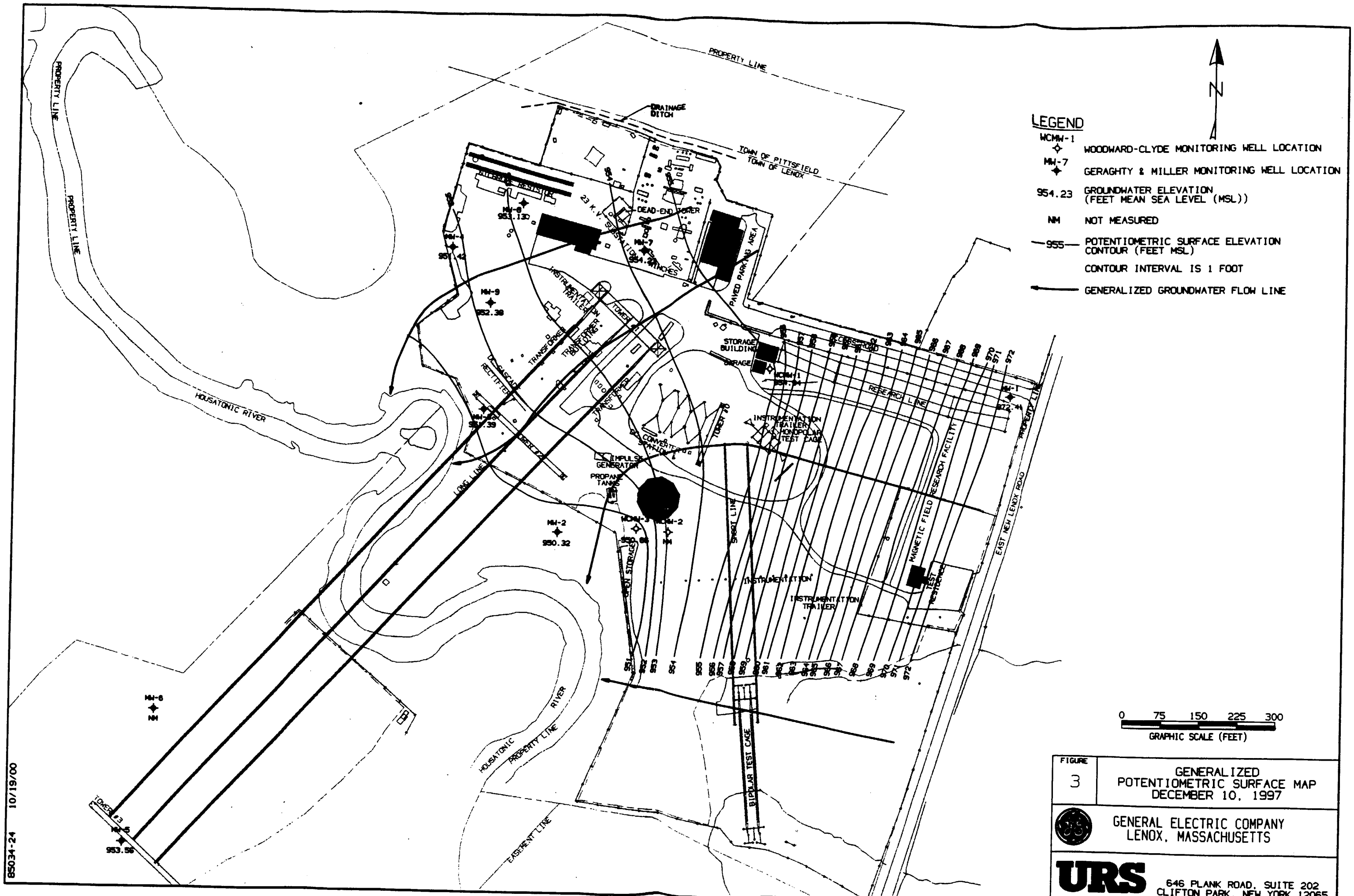
FIGURE	SITE LOCATION MAP
1	

GENERAL ELECTRIC COMPANY,
LENOX, MASSACHUSETTS

URS

646 PLANK ROAD, SUITE 202
CLIFTON PARK, NEW YORK 12065


LEGEND
APPROXIMATE SITE BOUNDARY
PROPERTY LINE
SWITCHYARD
TOWN OF PITTSFIELD
TOWN OF LENOX
HEADQUARTERS BUILDING
DEAD-END TOWER
23 kV SUBSTATION
WINCHES
ENV BUILDING
PAVED PARKING AREA
INSTRUMENTATION TRAILER
TOWER #1
TRANSFORMER
TRANSFORMER BUILDING
STORAGE BUILDING
GARAGE
ACCESS ROAD
RESEARCH LINE
DC CASCADE RECTIFIER
TOWER #2
TRANSFORMER
CONVERTER STATION
TOWER #3
INSTRUMENTATION TRAILER
MONOPOLE TEST CAGE
IMPULSE GENERATOR
PROPANE TANKS
UHV BUILDING
LOAD LINE
SHORT LINE
MAGNETIC FIELD RESEARCH FACILITY
EAST NEW LENOX ROAD
OPEN STORAGE
INSTRUMENTATION
INSTRUMENTATION TRAILER
TEST RESIDENCE
HOUSATONIC RIVER
FLOW
HOUSATONIC RIVER PROPERTY LINE
EASEMENT LINE
BIPOLAR TEST CAGE
FORMER BUBBLE SITE
TOWER #3
N
0 75 150 225 300
GRAPHIC SCALE (FEET)
85034-26 09/21/00
FIGURE 2
SITE MAP
GENERAL ELECTRIC COMPANY
LENOX, MASSACHUSETTS
URS
646 PLANK ROAD, SUITE 202
CLIFTON PARK, NEW YORK 12065



LEGEND

- WCMW-1 ✧ — WOODWARD-CLYDE MONITORING WELL LOCATION
- MW-7 ✦ — GERAGHTY & MILLER MONITORING WELL LOCATION
- 954.23 — GROUNDWATER ELEVATION (FEET MEAN SEA LEVEL (MSL))
- NM — NOT MEASURED
- —955— — POTENTIOMETRIC SURFACE ELEVATION CONTOUR (FEET MSL)
- CONTOUR INTERVAL IS 1 FOOT
- GENERALIZED GROUNDWATER FLOW LINE

N

0 75 150 225 300
GRAPHIC SCALE (FEET)

FIGURE 3

GENERALIZED POTENTIOMETRIC SURFACE MAP
DECEMBER 10, 1997

GENERAL ELECTRIC COMPANY
LENOX, MASSACHUSETTS

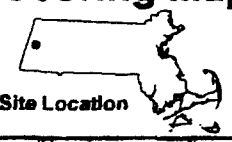
URS
646 PLANK ROAD, SUITE 202
CLIFTON PARK, NEW YORK 12065

85034-24 10/19/00

Originals in color

SITE NAME:
EPRI422404n 731403ew

Site Scoring Map: 500 feet & 0.5 Mile Radii



The information shown on this map is the best available at the date of printing. Please refer to the data source descriptions document.

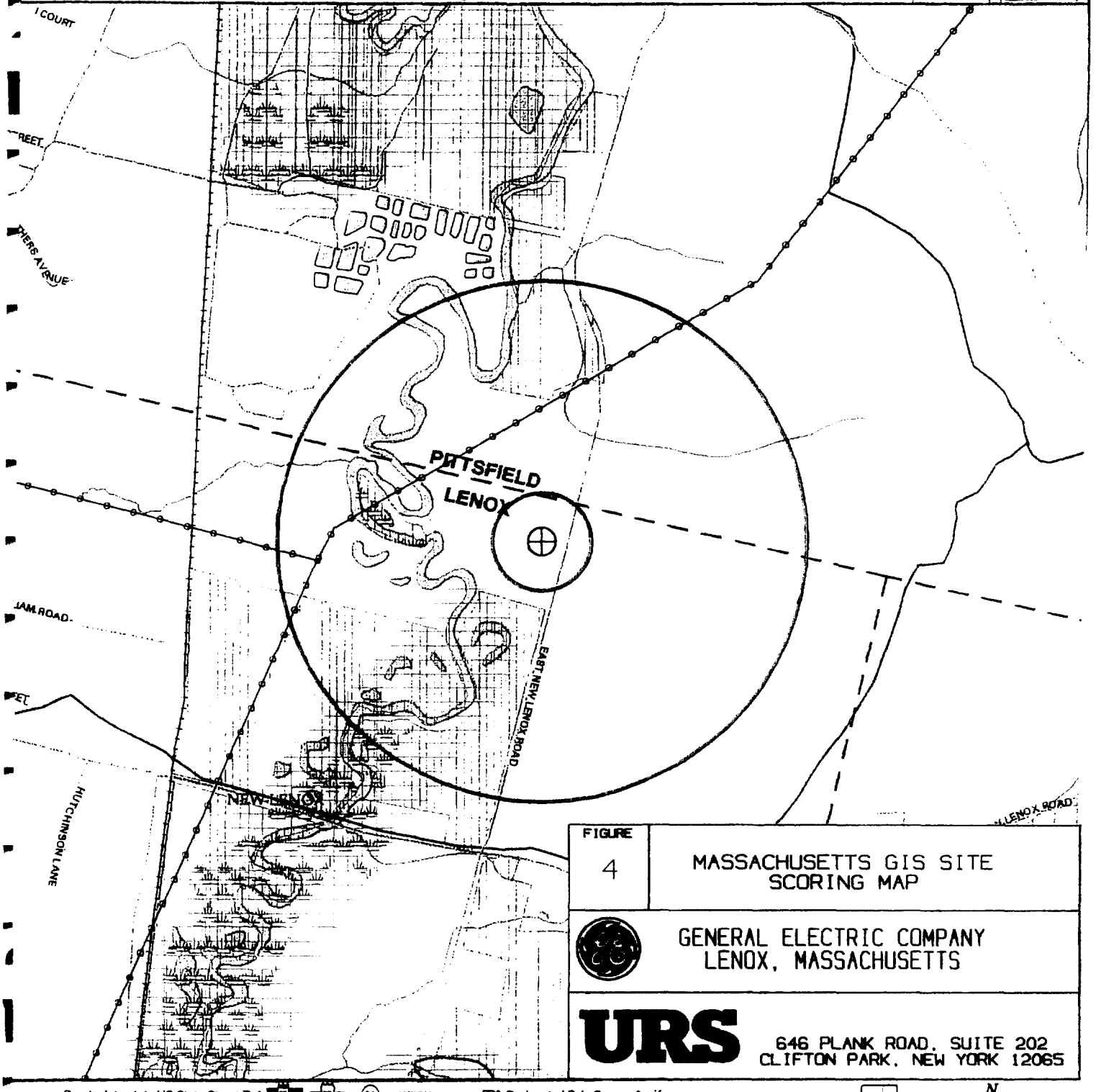


FIGURE	
4	MASSACHUSETTS GIS SITE SCORING MAP
	GENERAL ELECTRIC COMPANY LENOX, MASSACHUSETTS
URS	646 PLANK ROAD, SUITE 202 CLIFTON PARK, NEW YORK 12065

Roads: Interstate,US,State,Street,Trail
Boundaries: Municipal,County,DEP Region
Train; Powerline; Pipeline
Drainage Basins: Major,Sub
Streams: Perennial,Intermittent,Aqueduct
Potentially Productive Aquifers: Medium Yield,High Yield
Non-Potential Drinking Water Source Area: Medium,High Yield
EPA Designated Sole Source Aquifer
Public Water Supplies: Ground,Surface,Non Community
Approved Zone2; IWPA;
Hydrography: Water Features,Public Surface Water Supply
Wetlands: Fresh,Salt,NHESP Wetlands Habitat
Protected Open Space; ACEC
DEP Permitted Solid Waste Facilities; Certified Vernal Pools

N W E S

SCALE 1:15000

0 1/2 0 1/2 MILES
KILOMETERS

March 11, 1998

TARGET SHEET

THE MATERIAL DESCRIBED BELOW
WAS NOT SCANNED BECAUSE:

(X) OVERSIZED MAP

() NON-PAPER MEDIA

() OTHER:

DOC ID: 213202
DATE: 11/29/2000
TITLE: PHASE 2 COMPREHENSIVE SITE ASSESSMENT SCOPE OF WORK, ELECTRIC POWER RESEARCH INSTITUTE, LENOX, MASSACHUSETTS
DESCRIPTION: FIGURE 5: PROPOSED SOIL BORINGS

THE OMITTED MATERIAL IS AVAILABLE FOR REVIEW
BY APPOINTMENT
AT THE EPA NEW ENGLAND SUPERFUND RECORDS CENTER,
BOSTON, MA

APPENDIX A

COMPREHENSIVE RESPONSE ACTION TRANSMITTAL FORM AND PHASE I COMPLETION FORM (BWSC-108)

Massachusetts Department of Environmental Protection **BWSC-108**
Bureau of Waste Site Cleanup

COMPREHENSIVE RESPONSE ACTION TRANSMITTAL FORM & PHASE I COMPLETION STATEMENT

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

Release Tracking: 1 - 1083

A. SITE LOCATION:

Site Name: (optional) Electric Power Research Institute

Street: 1000 New Lenox Road Location Aid:

City/Town: Lenox ZIP 01240-2216

Related Release Tracking Numbers that this Form Addresses:

Tier Classification: (check one of the following) ☐ Tier IA ☐ Tier IB ☐ Tier IC ☑ Tier II ☐ Not Tier Classified

If a Tier I Permit has been issued, state the Permit

B. THIS FORM IS BEING USED TO: (check all that apply)

☐ Submit a **Phase I Completion Statement**, pursuant to 310 CMR 40.0484 (complete Sections A, B, C, G, H, I and J).

☑ Submit a **Phase II Scope of Work**, pursuant to 310 CMR 40.0834 (complete Sections A, B, C, G, H, I and J).

☐ Submit a final **Phase II Comprehensive Site Report and Completion Statement**, pursuant to 310 CMR 40.0836 (complete Sections A, B, C, D, G, H, I and J).

☐ Submit a **Phase III Remedial Action Plan and Completion Statement**, pursuant to 310 CMR 40.0862 (complete Sections A, B, C, G, H, I and J).

☐ Submit a **Phase IV Remedy Implementation Plan**, pursuant to 310 CMR 40.0874 (complete Sections A, B, C, G, H, I and J).

☐ Submit an **As-Built Construction Report**, pursuant to 310 CMR 40.0875 (complete Sections A, B, C, G, H, I and J).

☐ Submit a **Phase IV Final Inspection Report and Completion Statement**, pursuant to 310 CMR 40.0878 and 40.0879 (complete Sections A, B, C, E, G, H, I and J).

☐ Submit a periodic **Phase V Inspection & Monitoring Report**, pursuant to 310 CMR 40.0892 (complete Sections A, B, C, G, H, I and J).

☐ Submit a final **Phase V Inspection & Monitoring Report and Completion Statement**, pursuant to 310 CMR 40.0893 (complete Sections A, B, C, F, G, H, I and J).

You must attach all supporting documentation required for each use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.

C. RESPONSE ACTIONS:

☐ Check here if any response action(s) that serves as the basis for the Phase submittal(s) involves the use of Innovative Technologies. (DEP is interested in using this information to create an Innovative Technologies Clearinghouse.)

Describe

D. PHASE II COMPLETION STATEMENT:

Specify the outcome of the Phase II Comprehensive Site Assessment:

☐ Additional Comprehensive Response Actions are necessary at this Site, based on the results of the Phase II Comprehensive Site Assessment

☐ The requirements of a Class A Response Action Outcome have been met and a completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

☐ The requirements of a Class B Response Action Outcome have been met and a completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

☐ Rescoring of this Site using the Numerical Ranking System is necessary, based on the results of the final Phase II Report.

E. PHASE IV COMPLETION STATEMENT:

Specify the outcome of Phase IV activities:

☐ Phase V operation, maintenance or monitoring of the Comprehensive Response Action is necessary to achieve a Response Action Outcome.
(This site will be subject to a Phase V Operation, Maintenance and Monitoring Annual Compliance Fee.)

☐ The requirements of a Class A Response Action Outcome have been met. No additional operation, maintenance or monitoring is necessary to ensure the integrity of the Response Action Outcome. A completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

☐ The requirements of a Class C Response Action Outcome have been met. No additional operation, maintenance or monitoring is necessary to ensure the integrity of the Response Action Outcome. A completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

SECTION E IS CONTINUED ON THE NEXT PAGE

Massachusetts Department of Environmental Protection **BWSC-108**
Bureau of Waste Site Cleanup

COMPREHENSIVE RESPONSE ACTION TRANSMITTAL FORM & PHASE I COMPLETION STATEMENT

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

Release Tracking: 1 - 1083

E. PHASE IV COMPLETION STATEMENT: (continued)

☐ The requirements of a Class C Response Action Outcome have been met. Further operation, maintenance or monitoring of the remedial action is necessary to ensure that conditions are maintained and that further progress is made toward a Permanent Solution. A completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

Indicate whether the operation and maintenance will be Active or Passive. (Active Operation and Maintenance is defined at 310 CMR

○ Active Operation and Maintenance ○ Passive Operation and Maintenance

(Active Operation and Maintenance makes the Site subject to a Post-RAO Class C Active Operation and Maintenance Annual Compliance Fee.)

F. PHASE V COMPLETION STATEMENT:

Specify the outcome of Phase V activities:

☐ The requirements of a Class A Response Action Outcome have been met and a completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

☐ The requirements of a Class C Response Action Outcome have been met. No additional operation, maintenance or monitoring is necessary to ensure the integrity of the Response Action Outcome. A completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

☐ The requirements of a Class C Response Action Outcome have been met. Further operation, maintenance or monitoring of the remedial action is necessary to ensure that conditions are maintained and that further progress is made toward a Permanent Solution. A completed Response Action Outcome Statement (BWSC-104) will be submitted to DEP.

Indicate whether the operation and maintenance will be Active or Passive. (Active Operation and Maintenance is defined at 310 CMR

○ Active Operation and Maintenance ○ Passive Operation and Maintenance

(Active Operation and Maintenance makes the Site subject to a Post-RAO Class C Active Operation and Maintenance Annual Compliance

G. LSP OPINION:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with the information contained in this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge, information and belief,

> *If Section B indicates that a **Phase I, Phase II, Phase III, Phase IV or Phase V Completion Statement** is being submitted*, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> *If Section B indicates that a **Phase II Scope of Work or a Phase IV Remedy Implementation Plan** is being submitted*, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> *If Section B indicates that an **As-Built Construction Report or a Phase V Inspection and Monitoring Report** is being submitted*, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

☐ Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.

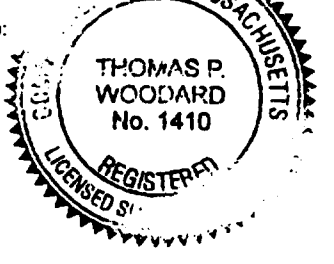
LSP Name: Thomas P. Woodard LSP #: 1410 Stamp:

Telephone: 207-879-7686 Ext.: 225

FAX: (optional) 207-879-7685

Signature:

Date: December 1, 2000



Massachusetts Department of Environmental Protection **BWSC-108**
Bureau of Waste Site Cleanup

COMPREHENSIVE RESPONSE ACTION TRANSMITTAL FORM & PHASE I COMPLETION STATEMENT

Pursuant to 310 CMR 40.0484 (Subpart D) and 40.0800 (Subpart H)

Release Tracking 1 - 1083

H. PERSON UNDERTAKING RESPONSE ACTION(S):

Name of General Electric Company

Name of Edward Jamison Title: EHS Remediation Manager

Street: One River Road, Building 43, Room 237

City/Town: Schenectady State: NY ZIP Code: 12345-0000

Telephone: 518-385-7979 Ext.: _____ FAX: 518-385-4074

☐ Check here if there has been a change in the person undertaking the Response Action.

I. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RESPONSE ACTION(S): (check one)

☑ RP or PRP Specify: ◯ Owner ◯ Operator ◯ Generator ◯ Transporter Other RP or PRP: Former Owner/Operator

☐ Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

☐ Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

☐ Any Other Person Undertaking Response Action Specify _____

J. CERTIFICATION OF PERSON UNDERTAKING RESPONSE ACTION(S):

I, Edward Jamison, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

By: _____ Title: EHS Remediation Manager
(signature)

For: General Electric Company Date: 11/29/01
(print name of person or entity recorded in Section H)

Enter address of the person providing certification, if different from address recorded in Section H:

Street: _____

City/Town: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ FAX: (optional) _____

YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.