

GE Global Operations, Environmental, Health & Safety

159 Plastics Avenue Pittsfield, MA 01201 USA

Transmitted via Overnight Courier

October 8, 2015

Mr. Dean Tagliaferro U.S. Environmental Protection Agency Region I – New England c/o Weston Solutions, Inc. 10 Lyman Street, Suite 2 Pittsfield, MA 01201 (Hard copy and CD-ROM of report) Mr. Michael Gorski Regional Director Western Regional Office Department of Environmental Protection 436 Dwight Street Springfield, MA 01103 (Hard copy of cover letter and CD-ROM of report)

Re: GE-Pittsfield/Housatonic River Site Monthly Status Report Pursuant to Consent Decree –September 2015 (GECD900)

Dear Mr. Tagliaferro and Mr. Gorski:

Enclosed are copies of General Electric's (GE's) monthly progress report for September 2015 activities conducted by GE at the GE-Pittsfield/Housatonic River Site. This monthly report is submitted pursuant to Paragraph 67 of the Consent Decree (CD) for this Site, which was entered by the U.S. District Court on October 27, 2000.

This monthly report includes not only activities conducted by GE under the CD, but also certain other activities conducted by GE at the GE-Pittsfield/Housatonic River Site (as defined in the CD). It is formatted to apply to the various areas of the Site as defined in the CD; and it includes, where applicable, tables summarizing sampling and testing results, recovery information for non-aqueous-phase liquid, and other data received by GE during the subject month. The activities conducted specifically pursuant to or in connection with the CD are marked in the text with an asterisk. As described in GE's cover letters for its monthly reports for March and April 2015, the enclosed monthly report does not include certain information that the U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MDEP) have agreed need not be reported.

Please call me if you have any questions about this monthly report.

Mr. Dean Tagliaferro and Mr. Michael Gorski October 8, 2015 Page 2 of 2

Sincerely,

Mind W. Juto

Richard W. Gates Senior Project Manager Global Operations - Environment, Health and Safety

Enclosure

Richard Fisher, EPA cc: Robert Cianciarulo, EPA (cover letter only) Tim Conway, EPA (cover letter only) Dave Dickerson, EPA (cover letter and Items 7 and 20) Chris Ferry, ASRC Primus (cover letter and CD-ROM of report) Scott Campbell, Avatar Environmental (hard copy and CD-ROM of report) Robert Leitch, USACE (CD-ROM of report) John Ziegler, MDEP (cover letter and CD-ROM of report) Eva Tor, MDEP (cover letter via email) Karen Pelto, MDEP (CD-ROM of report) Nancy E. Harper, MA AG (cover letter only) Susan Peterson, CT DEEP (hard copy and CD-ROM of report) Field Supervisor, US FWS, DOI Kenneth Finkelstein, Ph.D., NOAA (cover letter and Items 13, 14, and 15) Nate Joyner, City of Pittsfield (cover letter and CD-ROM of report) Corydon L. Thurston, Director, Pittsfield Economic Development Authority Jack Yablonsky, Berkshire Gas (CD-ROM of report) Richard Nasman, P.E., Berkshire Gas (cover letter only) Andrew Silfer, GE (cover letter only) Rod McLaren, GE (CD-ROM of report) James Nuss, ARCADIS James Bieke, Sidley Austin Greg Hencir, AECOM (CD-ROM of report) Kevin Russell, Anchor QEA (narrative only) Public Information Repositories (1 hard copy, 5 copies of CD-ROM) GE Internal Repository (1 hard copy)

(w/o separate CD-ROM, except where noted)

SEPTEMBER 2015

MONTHLY STATUS REPORT PURSUANT TO CONSENT DECREE FOR GE-PITTSFIELD/HOUSATONIC RIVER SITE

GENERAL ELECTRIC COMPANY

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PITTSFIELD, MASSACHUSETTS

Background

The General Electric Company (GE), the United States Environmental Protection Agency (EPA), the Massachusetts Department of Environmental Protection (MDEP), and other governmental entities have entered into a Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site, which was entered by the U.S. Court on October 27, 2000. In accordance with Paragraph 67 of the CD, GE is submitting the monthly report, prepared on GE's behalf by ARCADIS (formerly Blasland, Bouck & Lee, Inc.), which summarizes the status of activities conducted by GE at the GE-Pittsfield/Housatonic River Site ("Site (as defined in the CD).

This report covers activities in the areas listed below (as defined in the CD and/or the accompanying Statement of Work for Removal Actions Outside the River [SOW]). Only those areas that have had work activities for the month subject to reporting are included. These items are highlighted below in bold type. The specific activities conducted pursuant to or in connection with the CD are noted with an asterisk.

General Activities (GECD900)

GE Plant Area (non-groundwater)

- 1. 20s, 30s, 40s Complexes (GECD120)
- 2. East Street Area 2 South (GECD150)
- 3. East Street Area 2 North (GECD140)
- 4. East Street Area 1 North (GECD130)
- 5. Hill 78 and Building 71 Consolidation Areas (GECD210/220)
- 6. Hill 78 Area Remainder (GECD160)
- 7. Unkamet Brook Area (GECD170)

Former Oxbow Areas (non-groundwater)

- 8. Former Oxbow Areas A & C (GECD410)
- 9. Lyman Street Area (GECD430)
- 10. Newell Street Area I (GECD440)
- 11. Newell Street Area II (GECD450)
- 12. Former Oxbow Areas J & K (GECD420)

Housatonic River

- 13. Upper ¹/₂-Mile Reach (GECD800)
- 14. 1¹/₂-Mile Reach (only for activities, if any, conducted by GE) (GECD820)
- 15. Rest of the River (GECD850)

Housatonic River Floodplain

- 16. Current Residential Properties Adjacent to 1¹/₂-Mile Reach (Actual/Potential Lawns) (GECD710)
- 17. Non-Residential Properties Adjacent to 1½-Mile Reach (excluding banks) (GECD720)
- 18. Current Residential Properties Downstream of Confluence (Actual/Potential Lawns) (GECD730)

Other Areas

- 19. Allendale School Property (GECD500)
- 20. Silver Lake Area (GECD600)

Groundwater Management Areas (GMAs)

- 21. Plant Site 1 (GECD310)
- 22. Former Oxbows J & K (GECD320)
- 23. Plant Site 2 (GECD330)
- 24. Plant Site 3 (GECD340)
- 24A. On-Plant Consolidation Areas, Post-Closure Program
- 25. Former Oxbows A&C (GECD350)

GENERAL ACTIVITIES GE-PITTSFIELD/HOUSATONIC RIVER SITE (GECD900) SEPTEMBER 2015

a. Activities Undertaken/Completed

- Continued GE-EPA electronic data exchanges for the Housatonic River Watershed.
- Performed the biennial cleaning of four oil/water separator structures (64Z, 64W, 64X, 119W), as required by the NPDES Permit. Transferred 192,000 gallons of water from those cleanout activities to the Building 64G Groundwater Treatment Facility (GWTF) in September 2015.

b. Sampling/Test Results Received

Received sample results for routine sampling conducted pursuant to GE's NPDES Permit for the GE facility. A summary of those results is provided in Attachment A to this report.

c. Work Plans/Reports/Documents Submitted

Submitted NPDES Discharge Monitoring Reports (DMRs) for the period of August 1 through August 31, 2015 to EPA and MDEP (September 24, 2015).

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Continue NPDES Permit-related sampling and monitoring activities.
- Attend public and Citizens Coordinating Council (CCC) meetings, as appropriate.
- Submit updated letter on off-site waste shipments (October 2015).*
- Submit copies of GE's insurance policies, along with certificates of insurance, to EPA and MDEP pursuant to Paragraph 127 of the CD (due by October 27, 2015).*

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues

f. <u>Proposed/Approved Work Plan Modifications</u>

ITEM 1 PLANT AREA 20s, 30s, 40s COMPLEXES (GECD120) SEPTEMBER 2015

a. Activities Undertaken/Completed

None

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

- Submitted reports on the 2015 annual inspections of the former 20s, 30s, and 40s Complexes for compliance by the Pittsfield Economic Development Authority (PEDA) with the applicable Grants of Environmental Restrictions and Easements (EREs) for those areas (September 4, 2015).*
- Submitted report on the 2015 annual inspection of the stockpile/embankment at the former 40s Complex (September 4, 2015).*

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

None

e. General Progress/Unresolved Issues/Potential Schedule Impacts

Comments submitted in June 2015 by GE and PEDA on the draft NPDES Permit issued by EPA and MDEP to PEDA for discharge from its water quality basin in the former 30s Complex to Silver Lake are under review by EPA and MDEP.

f. Proposed/Approved Work Plan Modifications

ITEM 2 PLANT AREA EAST STREET AREA 2-SOUTH (GECD150) SEPTEMBER 2015

a. Activities Undertaken/Completed

- Conducted annual 2015 post-remediation inspection of the City Recreational Area (September 2, 2015).*
- Conducted summer 2015 post-remediation inspection (September 3, 2015).*

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

Submitted e-mail report on the August 2015 follow-up inspection of the invasive species Cypress spurge in and around the natural resource restoration/enhancement (NRRE) areas. (September 24, 2015)*

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Submit report on annual 2015 post-remediation inspection of the City Recreational Area (due by October 2, 2015).*
- Submit report on summer 2015 post-remediation inspection (due by October 5, 2015).*

e. General Progress/Unresolved Issues/Potential Schedule Impacts

GE will finalize and record a new easement from GE to the City of Pittsfield for a City pipeline in this area, together with termination of a prior easement, following receipt of the signed easement documents from the City.

f. Proposed/Approved Work Plan Modifications

ITEM 3 PLANT AREA EAST STREET AREA 2-NORTH (GECD140) SEPTEMBER 2015

a. Activities Undertaken/Completed

Completed excavations related to the repair of existing utilities and the installation of a new wind screen near an entrance to Building 100, as described in a July 1, 2015 pre-work notification to MDEP.

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

- Submitted report on 2015 annual ERE inspection of the former 19s Complex (September 4, 2015).*
- Submitted report on 2015 annual ERE inspection of Woodlawn Avenue (September 4, 2015).*

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Complete final site restoration and submit waste disposal documentation and an amended postwork notification form to MDEP, pursuant to the Revised ERE for this area, for an emergency excavation (conducted in March 2015) in the roadway just north of Building 100 to find and repair a fire protection water main break.*
- Submit waste disposal documentation and a post-work notification form to MDEP, pursuant to the Revised ERE for this area, for the excavations related to the repair of existing utilities and the installation of a new wind screen near an entrance to Building 100.

e. General Progress/Unresolved Issues/Potential Schedule Impacts

Review of PEDA's draft of a Revised ERE for the former 19s Complex (transmitted to EPA and MDEP on November 12, 2012) by EPA and MDEP is on hold pending PEDA's providing more information on redevelopment activities.*

f. Proposed/Approved Work Plan Modifications

ITEM 5 PLANT AREA HILL 78 & BUILDING 71 CONSOLIDATION AREAS (GECD210/220) SEPTEMBER 2015

* All activities described below for this item were conducted pursuant to the Consent Decree.

a. Activities Undertaken/Completed

- Transferred 6,000 gallons of leachate from the Building 71 On-Plant Consolidation Area (OPCA) to the Building 64G Groundwater Treatment Facility (GWTF) for treatment during September 2015 (see Table 5-1).
- Conducted the summer 2015 post-closure general inspection September 24, 2015)
- Conducted ambient air monitoring for PCBs (September 9-10, 2015).
- Conducted preliminary data review (PDR) of PCB analytical data for ambient air samples collected from the OPCA air monitors on September 9-10, 2015. The PDR was conducted based on the following data quality indicators associated with the tabulated data set sampling collection time, sampling calibration check, temperature receipt, associated blanks, laboratory control samples, recoveries and surrogate recoveries in accordance with Validation Annex F in GE's revised Field Sampling Plan/Quality assurance Project Plan (FSP/QAPP) and the Region 1 Data Validation Functional Guidelines referenced therein. The PDR resulted in minor qualifications of some data, mostly related to surrogate recoveries outside of control limits (See Table 5-2). Tier I and Tier II data validation of all PCB analytical data for ambient air samples collected from the OPCA air monitors during this event will be conducted after receiving the full data packages from the laboratory.

b. Sampling/Test Results Received

See attached tables.

c. Work Plans/Reports/Documents Submitted

None

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Submit report on the summer 2015 post-closure general inspection (October 26, 2015)
- Submit letter report to the natural resource trustees on the 2015 monitoring of the Cypress spurge and the status and effectiveness of the flea beetle population to control Cypress spurge at the Building 71 OPCA.

ITEM 5 (cont'd) PLANT AREA HILL 78 & BUILDING 71 CONSOLIDATION AREAS (GECD210/220) SEPTEMBER 2015

d. Upcoming Scheduled and Anticipated Activities (next six weeks) (cont'd)

- Conduct Tier I and Tier II data validation of all PCB analytical data for ambient air samples collected from the OPCA air monitors on September 9-10, 2015, after receiving the full data packages from the laboratory.
- Submit to EPA, via electronic mail, the PCB analytical results, along with Tier II validated results, for ambient air samples collected from the OPCA monitors on September 9-10, 2015.

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues.

f. Proposed/Approved Work Plan Modifications

TABLE 5-1

BUILDING 71 CONSOLIDATION AREA LEACHATE TRANSFER SUMMARY PLANT AREA - HILL 78 & BUILDING 71 CONSOLIDATION AREAS

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS September 2015

Month/Year	Total Volume of Leachate Transferred (Gallons)		
September 2014	0		
October 2014	0		
November 2014	6,000		
December 2014	0		
January 2015	0		
February 2015	0		
March 2015	6,000		
April 2015	0		
May 2015	6,000		
June 2015	0		
July 2015	0		
August 2015	0		
September 2015	6,000		

Note:

1. Leachate is transferred from the Building 71 On-Plant Consolidation Area to Building 64TG for Treatment.

TABLE 5-2 SUMMARY OF 2015 PCB AMBIENT AIR SAMPLING RESULTS HILL 78/BUILDING 71 ON PLANT CONSOLIDATION AREAS **GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS** (all results are µg/m³)

Date	West of OPCAs	West of OPCAs, colocated	Northwest of OPCAs	North of OPCAs	Southeast of OPCAs	Pittsfield Generating (PGC)	Background Sample Location (BK-3)	Data Validated?
07/21/15 - 07/22/15	0.0014 J ¹	0.0004 J ^{1.2}	0.0004	0.0004 J ²	0.0004 J ²	0.0009 J ²	0.0023 J ²	Tier I/II
09/09/15 - 09/10/15	0.0041 J ²	0.0031	0.0018 J ²	0.0008 J ²	0.0011 J ²	0.0010	0.0033	PDR ³
Exceedances of Notification Level (0.05 µg/m³)	None	None	None	None	None	None	None	

Notes:

All sampling activities performed by Berkshire Environmental Consultants, Inc. All analytical activities performed by Pace Analytical Services, Inc. J - The value is an estimated concentration.

 ¹ Detected sample result qualified as estimate ("J") due to co-located field duplicate RPD outside of control limits.
 ² Detected sample result qualified as estimate ("J") due to surrogate recoveries outside the control limits.
 ³ PDR was conducted based on the following data quality indicators associated with the tabulated data set above: sampling collection time, sampling calibration check, temperature receipt, associated blanks, laboratory control samples recoveries, and surrogate recoveries.

ITEM 6 PLANT AREA HILL 78 AREA - REMAINDER (GECD160) SEPTEMBER 2015

a. Activities Undertaken/Completed

Conducted 2015 annual post-remediation inspection (September 24, 2015).*

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

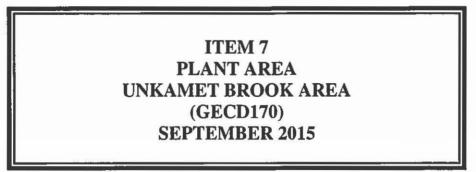
d. Upcoming Scheduled and Anticipated Activities (next six weeks)

Submit report on 2015 annual post-remediation inspection (due by October 26, 2015).*

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues.

f. Proposed/Approved Work Plan Modifications



a. Activities Undertaken/Completed

- Continued excavation and removal of material regulated under the Toxic Substances Control Act (TSCA) and placement of excavated material in the appropriate areas.*
- Loaded approximately 1,335 tons of non-TSCA soils for transportation to and disposal at an off-site disposal facility. Shipped 91 loads of TSCA-regulated material to an off-site disposal facility in September.*
- Performed ambient air monitoring for particulate matter at various locations with no exceedances of the notification level.*
- Performed ambient air monitoring for PCBs at UB-4, UB-6, UB-6CO (collocated), UB-31, and background (BK-3) monitoring locations on September 16-17, 2015.*
- Dismantled the TSCA and non-TSCA stockpile area located in the north end of the parking lot area.*
- Constructed a new stockpile area at East Street Area 2-South for potential re-use soils.*
- Continued to prepare the former brook channel to accept the relocated sanitary sewer line.*
- Completed TSCA and non-TSCA excavations at the southern inundated wetland area.*
- Substantially completed installation of engineered barrier subgrade and installation of liner components in the vegetated and northern parking lot portions of the former interior landfill. Also began placement and compaction of general fill over the liner components of these areas.*
- Received additional liner materials for engineered barrier.*
- Completed cleaning activities at Culvert #1.*
- Substantially completed installation of the YD-11/12 stormwater drainline, and began restoring the work area.

ITEM 7 (cont'd) PLANT AREA UNKAMET BROOK AREA (GECD170) SEPTEMBER 2015

a. <u>Activities Undertaken/Completed</u>

- Continued with general clean-up activities surrounding the Building 120s area to facilitate installation of sheetpile prior to commencement of excavation activities.*
- Completed seeding activities along the re-routed brook channel.*
- Treated any phragmites re-growth.*
- Received initial comments from EPA on a draft ERE for Parcel K12-9-1 and from EPA and the State on a draft Notice ERE for Parcel L12-2-1.*

b. Sampling/Test Results Received

Received the ambient air monitoring results for PCBs from the September 16-17, 2015 sampling event.* These results are presented in Table 7-1. (Note: The ambient air monitoring data for particulate matter during September showed no exceedances of the applicable notification level and thus are not presented.)

c. Work Plans/Reports/Documents Submitted

Submitted pre-excavation notification for fire hydrant and post indicator valve replacements (September 24, 2015).

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Complete construction of the engineered barrier at the vegetated area of interior landfill and at the northern end of the parking lot area.*
- Begin restoration activities at the northern parking lot area.*
- Continue/resume excavation at the Building 120s area.*
- Prepare for/begin sediment removal between culverts 1 and 2.*

ITEM 7 (cont'd) PLANT AREA UNKAMET BROOK AREA (GECD170) SEPTEMBER 2015

d. <u>Upcoming Scheduled and Anticipated Activities (next six weeks)</u> (cont'd)

- Complete final site restoration and submit waste disposal documentation and an amended postwork notification form to MDEP for an emergency excavation (conducted in February 2015) in the roadway just north of Building OP-1 to find and repair a fire protection water main break.
- Conduct 2015 ERE inspections of Petricca properties and City property (November 2015).*
- Continue to perform sampling of materials currently stockpiled in the staging area for potential reuse as needed.*
- Continue ambient air monitoring for PCBs (monthly) and particulate matter (daily on working days).*
- Continue turbidity monitoring within Unkamet Brook prior to the start of sediment removal activities
- Perform weekly surface water sampling during active remediation of brook channel.*
- Review EPA's comments on the draft ERE for Parcel K12-9-1 and the draft Notice ERE for Parcel L12-2-1.*
- Conduct 2015 annual ERE inspections of Petricca properties and City property (November 2015).*

e. General Progress/Unresolved Issues/Potential Schedule Impacts

- GE and EPA are discussing the timing for submission of a Post-Removal Site Control Plan/Restoration Project Monitoring and Maintenance Plan.*
- A draft of the Conservation Easement and Restriction for the wetlands east of the former interior landfill is under review by EPA and the State.*

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	ITEM 7
	(cont'd)
	PLANT AREA
	UNKAMET BROOK AREA
	(GECD170)
	SEPTEMBER 2015
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f. Proposed/Approved Work Plan Modifications

TABLE 7-1 AMBIENT AIR PCB DATA RECEIVED DURING SEPTEMBER 2015

PCB AMBIENT AIR CONCENTRATIONS UNKAMET BROOK GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Sampling Event Period	Date Analytical Results Received by Berkshire Environmental Consultants, Inc.	Field Blank (µg/PUF)	UB-6 (µg/m ³)	UB-6CO (colocated) (µg/m³)	UB-7 (µg/m³)	UB-31 (µg/m ³)	Background BK-3 (µg/m ³)
09/16/15 - 09/17/15	09/23/15	ND (<0.10)	0.0262	0.0311	0.0068	0.0023	0.0016
	Notification Level	· · · ·	0.05	0.05	0.05	0.05	0.05

ND - Non-Detect

ITEM 8 FORMER OXBOW AREAS A&C (GECD410) SEPTEMBER 2015

a. Activities Undertaken/Completed

Conducted 2015 annual post-remediation inspection (September 2, 2015).*

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Submit report on 2015 annual post-remediation inspection (due by October 2, 2015).*
- Conduct 2015 annual Conditional Solution inspections (November 2015).*

e. <u>General Progress/Unresolved Issues/Potential Schedule Impacts</u>

No issues.

f. Proposed/Approved Work Plan Modifications

ITEM 9 LYMAN STREET AREA (GECD430) SEPTEMBER 2015

* All activities described below for this item were conducted pursuant to the Consent Decree.

a. Activities Undertaken/Completed

None

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

Submitted report on summer 2015 post-remediation inspection (September 17, 2015).

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Prepare and submit report on August 2015 (final) inspection of NRRE measures.
- Conduct 2015 annual ERE inspection (City property) (November 2015).*
- Conduct 2015 annual Conditional Solution inspections (November 2015).*

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues.

f. Proposed/Approved Work Plan Modifications

ITEM 10 NEWELL STREET AREA I (GECD440) SEPTEMBER 2015

* All activities described below for this item were conducted pursuant to the Consent Decree.

a. Activities Undertaken/Completed

None

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

Submitted report on summer 2015 post-remediation inspection (September 17, 2015).

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Conduct 2015 annual ERE inspections (November 2015).*
- Conduct 2015 annual Conditional Solution inspections (November 2015).*

e. <u>General Progress/Unresolved Issues/Potential Schedule Impacts</u>

No issues.

f. Proposed/Approved Work Plan Modifications

ITEM 11 NEWELL STREET AREA II (GECD450) SEPTEMBER 2015

* All activities described below for this item were conducted pursuant to the Consent Decree.

a. Activities Undertaken/Completed

None

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

Submitted report on summer 2015 post-remediation inspection (due by September 18, 2015).

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Prepare and submit report on August 2015 (final) inspection of NRRE measures.
- Conduct 2015 annual ERE inspections (November 2015).*
- Conduct 2015 annual Conditional Solution inspections (November 2015).*

e. <u>General Progress/Unresolved Issues/Potential Schedule Impacts</u>

No issues.

f. Proposed/Approved Work Plan Modifications

ITEM 12 FORMER OXBOW AREAS J & K (GECD420) SEPTEMBER 2015

* All activities described below for this item were conducted pursuant to the Consent Decree.

a. Activities Undertaken/Completed

Conducted 2015 annual post-remediation inspection (September 2, 2015).*

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Submit report on 2015 annual post-remediation inspection (October 2, 2015).*
- Conduct 2015 annual Conditional Solution inspections (November 2015).*

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues.

f. Proposed/Approved Work Plan Modifications

ITEM 13 HOUSATONIC RIVER AREA UPPER ½ MILE REACH (GECD800) SEPTEMBER 2015

a. Activities Undertaken/Completed

None

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

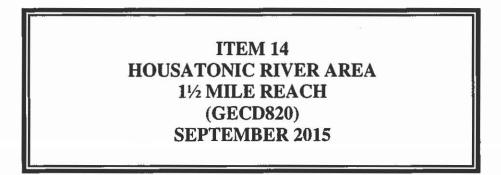
d. Upcoming Scheduled and Anticipated Activities (next six weeks)

None

e. General Progress/Unresolved Issues/Potential Schedule Impacts

GE submitted a report evaluating the total organic carbon (TOC) content and effectiveness of the isolation layer on the river sediments on March 14, 2007. The Final Completion Report for the Upper ¹/₂-Mile Reach Removal Action will be submitted following EPA review and approval of that report.*

f. Proposed/Approved Work Plan Modifications



a. Activities Undertaken/Completed

Performed one round of water column monitoring at ten locations along the Housatonic River between Coltsville and Great Barrington on September 23, 2015. Two of the locations monitored are situated in the 1½ Mile Reach: Lyman Street Bridge (Location 4) and Pomeroy Avenue Bridge (Location 6A). A composite grab sample was collected at each location and submitted for analysis of PCBs (total) and total suspended solids (TSS). (The other seven locations are discussed under Items 15 and 20 below.)

b. Sampling/Test Results Received

Received results from a water column monitoring event performed on August 25, 2015 at the two above locations situated in the 1½ Mile Reach. These results are presented in attached Table 14-1.

c. Work Plans/Reports/Documents Submitted

None

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Continue Housatonic River water column monitoring.
- Conduct 2015 annual ERE inspections (November 2015).*
- Conduct 2015 annual Conditional Solution inspections (November 2015).*

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues.

f. Proposed/Approved Work Plan Modifications

TABLE 14-1 SAMPLE DATA RECEIVED DURING SEPTEMBER 2015

MONTHLY WATER COLUMN SAMPLING HOUSATONIC RIVER - 1 1/2 MILE REACH GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS (Results are presented in parts per million, ppm)

Parameter	Location: Sample ID: Date Collected:	Lyman Street Bridge LOCATION-4 08/25/15	Pomeroy Ave. Bridge LOCATION-6A 08/25/15
PCBs-Unfiltered			
Aroclor-1221		0.0000077 PB,B	0.000026 PB
Aroclor-1248		0.0000092 PE,B	0.000023 PE
Aroclor-1254		0.0000087 AF,B	0.000022 AF
Aroclor-1260		0.0000057 AG,B	0.000022 AG
Total PCBs		0.0000313	0.000093
Conventional			
Total Suspended S	olids	37.5	33.5

Notes.

- Samples were collected by ARCADIS, and submitted to Pace Analytical Services Inc. for analysis of PCBs (unfiltered) and total suspended solids (TSS).
- 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.
- 3. Only those constituents detected in one or more samples are summarized.

Data Qualifiers:

AG - Aroclor 1260 is being reported as the best Aroclor match. The sample exhibits an altered PCB pattern. AF - Aroclor 1254 is being reported as the best Aroclor match. The sample exhibits an altered PCB pattern. B - Analyte was also detected in the associated method blank.

PB - Aroclor 1221 is being used to report an altered PCB pattern exhibited by the sample. Actual Aroclor 1221 is not present in the sample, but is reported to more accurately quantify PCBs present in a sample that has undergone environmental alteration.

PE - Aroclor 1248 is being used to report an altered PCB pattern exhibited by the sample. Actual Aroclor 1248 is not present in the sample, but is reported to more accurately quantify PCBs present in a sample that has undergone environmental alteration.

ITEM 15 HOUSATONIC RIVER AREA REST OF THE RIVER (GECD850) SEPTEMBER 2015

a. Activities Undertaken/Completed

- Performed one round of water column monitoring at ten locations along the Housatonic River between Coltsville and Great Barrington, MA on September 23, 2015. Two locations sampled are situated in the 1½ Mile Reach of the Housatonic River and were discussed in Item 14. One location is at the outlet of Silver Lake and is discussed in Item 20 below. Of the remaining seven locations, two are located upstream of the 1½ Mile Reach: Hubbard Avenue Bridge (Location 1) and Newell Street Bridge (Location 2). The five remaining locations are situated in the Rest of the River: Holmes Road Bridge (Location 7); New Lenox Road Bridge (Location 9); Woods Pond Headwaters (Location 10); Schweitzer Bridge (Location 12); and Division Street Bridge (Location 13). Composite grab samples were collected at each sampled location and submitted for analysis of PCBs (total) and TSS.
- Received EPA's notification of its intended final decision on remedy for Rest of River (September 30, 2015).*

b. Sampling/Test Results

Received results from a water column monitoring event performed on August 25, 2015 at the seven locations listed above. These results are presented in attached Table 15-1.

c. Work Plans/Reports/Documents Submitted

None

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Continue Housatonic River monthly water column monitoring.
- Review EPA's intended final remedy decision and, if GE so elects, invoke dispute resolution on that intended final decision (due by October 30, 2015).*
- If dispute resolution invoked, commence informal negotiations on the dispute of the intended final remedy decision.*
- Receive and review draft report from the Academy of Natural Sciences of Drexel University on the 2014 sampling of fish and benthic insects in the Connecticut portion of the river.

ITEM 15 (cont'd) HOUSATONIC RIVER AREA REST OF THE RIVER (GECD850) SEPTEMBER 2015

e. <u>General Progress/Unresolved Issues/Potential Schedule Impacts</u>

GE may dispute EPA's notification of its intended final remedy decision.

f. Proposed/Approved Work Plan Modifications

TABLE 15-1 SAMPLE DATA RECEIVED DURING SEPTEMBER 2015

MONTHLY WATER COLUMN SAMPLING HOUSATONIC RIVER - REST OF RIVER GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS (Results are presented in parts per million, ppm)

	Location: Sample ID: Collected:	Hubbard Avenue Bridge LOCATION-1 08/25/15	Newell Street Bridge LOCATION-2 08/25/15	Holmes Road Bridge LOCATION-7 08/25/15	New Lenox Road Bridge LOCATION-9 08/25/15	Headwaters of Woods Pond LOCATION-10 08/25/15	Schweitzer Bridge LOCATION-12 08/25/15	Division Street Bridge LOCATION-13 08/25/15
PCBs-Unfiltered								
Aroclor-1221		ND(0.0000055)	0.000014 PB,B	0.000013 PB,B	0.0000085 PB	0.0000097 PB	0.0000056 PB (0.0000089 PB,B)	0.000015 P8
Aroclor-1248		0.0000072 AE,B	0.000013 PE,B	0.000017 PE,B	0.000031 PE	0.000042 PE	0.000024 PE [0.000030 PE,B]	0.0000075 PE
Aroclor-1254		ND(0.0000055)	0.000013 AF,B	0.000026 AF,B	0.000047 AF	0.000039 AF	0.000026 AF [0.000031 AF,B]	0.000014 AF
Aroclor-1260		ND(0.0000055)	0.0000087 AG,B	0.000046 AG,B	0.000081 AG	0.000053 AG	0.000028 AG [0.000039 AG,B]	0.000023 AG
Total PCBs		0.0000072	0.0000487	0.000102	0.000168	0.000144	0.0000836 [0.000109]	0.0000595
PCBs-Filtered								
Aroclor-1221	1	NA	NA	NA	NA	NA	NA	NA
Aroctor-1242		NA	NA	NA	NA	NA	NA	NA
Total PCBs		NA	NA	NA	NA	NA	NA	NA
Conventional	and the second s							
Total Suspended So	olids	28.4	29.7	38.5	5.47	4.72	6.83 (6.59)	5.29

Notes:

1. Samples were collected by ARCADIS, and submitted to Pace Analytical Services Inc. for analysis of PCBs (unfiltered) and total suspended solids (TSS).

2. 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.

3. NA - Not Analyzed.

4. ND - Analyte was not detected. The number in parentheses is the associated reporting limit.

5. Field duplicate sample results are presented in brackets.

6. Only those constituents detected in one or more samples are summarized.

Data Qualifiers:

AE - Aroclor 1248 is being reported as the best Aroclor match. The sample exhibits an altered PCB pattern.

AF - Aroclor 1254 is being reported as the best Aroclor match. The sample exhibits an altered PCB pattern.

AG - Aroclor 1260 is being reported as the best Aroclor match. The sample exhibits an altered PCB pattern.

B - Analyte was also detected in the associated method blank.

PB - Aroclor 1221 is being used to report an altered PCB pattern exhibited by the sample. Actual Aroclor 1221 is not present in the sample, but is reported to more accurately quantify PCBs present in a sample that has undergone environmental alteration.

PE - Aroclor 1248 is being used to report an altered PCB pattern exhibited by the sample. Actual Aroclor 1248 is not present in the sample, but is reported to more accurately quantify PCBs present in a sample that has undergone environmental alteration.

ITEMS 16 & 17 HOUSATONIC RIVER FLOODPLAIN RESIDENTIAL AND NON-RESIDENTIAL PROPERTIES ADJACENT TO 1½-MILE REACH (GECD710 AND GECD720) SEPTEMBER 2015

* All activities described below for this item were conducted pursuant to the Consent Decree.

a. Activities Undertaken/Completed

None

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

- Submitted report on 2015 annual inspection of Phase 2 floodplain properties (September 4, 2015).*
- Submitted report on 2015 annual inspection of Phase 3 floodplain properties (September 4, 2015).*

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Conduct 2015 annual Conditional Solution inspection of Parcel I7-1-5 (November 2015).*
- Conduct 2015 annual ERE inspections of Parcels I8-4-7 & I7-1-101 (November 2015).*

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues.

f. Proposed/Approved Work Plan Modifications

ITEM 18 HOUSATONIC RIVER FLOODPLAIN CURRENT RESIDENTIAL PROPERTIES DOWNSTREAM OF CONFLUENCE (ACTUAL/POTENTIAL LAWNS) (GECD730) SEPTEMBER 2015

* All activities described below for this item were conducted pursuant to the Consent Decree.

a. Activities Undertaken/Completed

Continued discussions with EPA regarding the soil sampling results from certain downstream floodplain residential properties, the implications for remediation, and other issues.

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

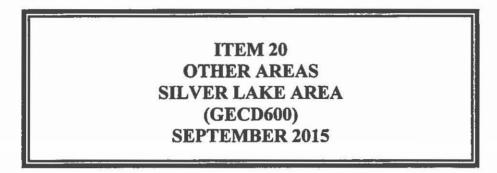
d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Continue discussions with EPA of sampling results, implications for remediation, and other issues.
- Prepare and submit Pre-Design Investigation Report.*

e. <u>General Progress/Unresolved Issues/Potential Schedule Impacts</u>

No issues.

f. Proposed/Approved Work Plan Modifications



* All activities described below for this item were conducted pursuant to the Consent Decree

a. Activities Undertaken/Completed

- Performed one round of water column monitoring at the Silver Lake Outfall (Location 4A) on September 23, 2015. A composite grab sample was collected and submitted for analysis of PCBs (total and dissolved) and TSS. Select field measurements made during the August 25, 2015 water column monitoring event are summarized in Table 20-2.
- Obtained a gauge reading at the Silver Lake Outfall on September 23, 2015 as part of the Housatonic River monitoring program. The lake level and discharge information for the Silver Lake Outfall are presented in Table 20-3.
- Reinitiated the general invasive species control program in this area.
- Conducted the annual 2015 inspection of the sediment cap and the sediment traps (September 10-11, 2015).

b. Sampling/Test Results Received

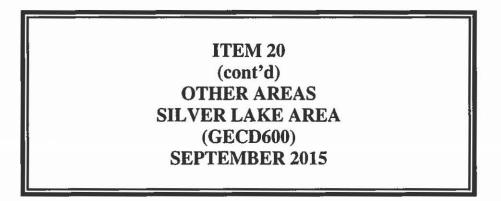
See attached tables.

c. Work Plans/Reports/Documents Submitted

- Submitted summer 2015 non-NRRE inspection report (September 9, 2015).*
- Submitted revised non-NRRE summary table (September 16, 2015).
- Submitted additional cap core collection proposal (September 25, 2015).

d. Upcoming Scheduled and Anticipated Activities (next six weeks

- Submit amended proposal for collection of additional cap cores in areas where measured thickness in September 2015 was less than Performance Standard.
- Collect additional cores from cap in areas where measured thickness in September 2015 was less than Performance Standard.



d. Upcoming Scheduled and Anticipated Activities (next six weeks) (cont'd)

- Discuss with the natural resource trustees (Trustees) the need to submit a revised version of the report on the spring 2015 inspection of NRRE measures.
- Submit report on the summer 2015 inspection of NRRE measures to the Trustees.
- Following collection of additional cap cores, prepare and submit report to EPA on the 2015 inspection(s) of the sediment cap and the sediment traps.
- Conduct 2015 annual ERE inspections (November 2015).*
- Conduct 2015 annual Conditional Solution inspections (November 2015).*

e. General Progress/Unresolved Issues/Potential Schedule Impacts

Issues relating to cap thickness measurements are under discussion with EPA.

f. Proposed/Approved Work Plan Modifications

- Received EPA's conditional approval of GE's June 19, 2015 spring 2015 inspection of shoreline armor system and non-NRRE plantings (September 3, 2015).
- Received comments from the Trustees on GE's July 8, 2015 report on the spring 2015 NRRE inspection (September 4, 2015).

TABLE 20-1 SAMPLE DATA RECEIVED DURING SEPTEMBER 2015

MONTHLY WATER COLUMN SAMPLING SILVER LAKE AREA GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS (Results are presented in parts per million, ppm)

Parameter	Location: Sample ID: Date Collected:	Silver Lake Area LOCATION-4A 08/25/15
PCBs-Unfiltered	1	
Aroclor-1221		0.000048 PB
Aroclor-1248		0.000022 PE
Aroclor-1254		0.0000076 AF
Total PCBs		0 0000776
PCBs-Filtered		
Aroclor-1221		0.000029 PB
Arocior-1242		0.000011 AD
Total PCBs		0.000040
Conventional		
Total Suspended	Solids	4.15

Notes:

- Sample was collected by ARCADIS, and submitted to Pace Analytical Services Inc. for analysis of PCBs and total suspended solids (TSS).
- Sampling methods involved the collection of a single grab at one location at 50
 percent of the total river width, and 50 percent of the total river depth.
- 3. Only detected constituents are summarized.

Data Qualifiers:

AF - Aroclor 1254 is being reported as the best Aroclor match. The sample exhibits an altered PCB pattern.

AD - Aroclor 1242 is being reported as the best Aroclor match. The sample exhibits an altered PCB pattern.

PB - Aroclor 1221 is being used to report an altered PCB pattern exhibited by the sample. Actual Aroclor 1221 is not present in the sample, but is reported to more accurately quantify PCBs present in a sample that has undergone environmental alteration.

PE - Aroclor 1248 is being used to report an altered PCB pattern exhibited by the sample. Actual Aroclor 1248 is not present in the sample, but is reported to more accurately quantify PCBs present in a sample that has undergone environmental alteration.

TABLE 20-2 SILVER LAKE FIELD MEASUREMENTS COLLECTED DURING SEPTEMBER 2015

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Date	Turbidity (Nephelometric Turbidity Units)	Water Temperature (Degrees Celsius)	Water Depth (feet)
9/23/2015	3	22.5	0.70

Note:

1. Measurements collected by ARCADIS (NA = Not Available).

TABLE 20-3 SILVER LAKE OUTLET DISCHARGE SILVER LAKE AREA

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS SEPTEMBER 2015

Date	Gauge Measurement (ft)	Measured Flow (cfs)	Calculated Flow (cfs)
9/23/2015	3.35		0.47

Notes:

2. Calculated flows developed using rating curve (rating curve revised July 2015).

- 3. Gauge located at top of grate at end of Silver Lake outlet channel.
- 4. "--" indicates meausrement not taken.

^{1.} Measured flows collected by ARCADIS by recording channel width, water depth, and velocities at Silver Lake Outlet.

TABLE 20-4
THICKNESS DATA FOR SEPTEMBER 2015 POST-CONSTRUCTION MONITORING
SILVER LAKE

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Core ID	Sample/ Measurement Date	Approximate Water Depth (ft)	Measured Recovery (inches)	Sediment removed from Core (inches)	Deposition (inches)	Approximate Cap Thickness (inches)
SL-CAP-01-YR2 2	9/10/2015	8.9	39	10.5	0	28.50
SL-CAP-02-YR2	9/10/2015	17.5	29.5	13.5	1	15.00
SL-CAP-03-YR2	9/10/2015	9.2	25	9	0.25	15.75
SL-CAP-04-YR2	9/10/2015	20.0	24.5	7.75	1.25	15.50
SL-CAP-05-YR2	9/11/2015	17.8	22	4.5	0.5	17.00
SL-CAP-06-YR2	9/11/2015	5.6	23.5	9.25	0.25	14.00
SL-CAP-07-YR2	9/11/2015	6.8	24.5	12	trace	12.50
SL-CAP-08-YR2	9/11/2015	21.2	31.5	12.25	1	18.25
SL-CAP-09-YR2	9/11/2015	24.2	29	12	1	16.00
SL-CAP-10-YR2	9/11/2015	18.7	28.5	13.75	0.5	14.25
SL-CAP-11-YR2	9/11/2015	5.8	31.5	5	trace	26.5
SL-CAP-12-YR2 3	9/11/2015	5.9	29.5	18.5	trace	11.00
SL-CAP-13-YR2	9/11/2015	24.6	29.5	9	0.5	20.00
SL-CAP-14-YR2	9/11/2015	27.3	28	11	1	16.00
SL-CAP-15-YR2	9/11/2015	23.8	33.5	14.5	1	18.00
SL-CAP-16-YR2	9/11/2015	8.2	27.5	14.25	0.25	13.00
SL-CAP-17-YR2	9/11/2015	6.2	28.5	9.75	0.25	18.50
SL-CAP-18-YR2	9/11/2015	23.5	30.5	10	0.25	20.25
SL-CAP-19-YR2	9/11/2015	12.0	25	6.5	trace	18.50
SL-CAP-20-YR2	9/11/2015	19.9	27.5	12.25	0.25	15.00
SL-CAP-21-YR2	9/11/2015	7.3	32.5	16.75	0.25	15.50

Notes:

1. The TOP interval represents the top inch of material collected, including approximately 0.0" to 0.5" of deposited material, depending on the location.

2. "Sediment Removed from Core" consisted of layers of grey brown fine sand, and black silt.

3. Cores were collected by ARCADIS. Locations targeted for core collection were located approximately five feet east of the furthest east during-construction

or post-construction coring location, to reduce the potential for collecting a core from a previously-sampled location.

G:\GE\GE_Silver_Lake_Confidential\Notes and Data\2015 inspections\09 coring\results\Yr 2 cores

TABLE 20-5 THICKNESS OBSERVATIONS FOR YEAR 1 (2015) POST-CONSTRUCTION SEDIMENT TRAP MONITORING SILVER LAKE GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Trap ID	Measurement Date	Range of Deposition Thickness (inches)	Average Deposition Thickness (inches)	Comments
ST-1-YR1	9/10/2015	1.00 - 2.25	1.50	Mostly black organic material, some decayed biota material
ST-2-YR1	9/10/2015	0.50 - 2.00	1.08	Mostly black organic material, some decayed biota material
ST-3-YR1	9/10/2015	0.75 - 1.50	0.97	Mostly black organic material
ST-4-YR1	9/10/2015	0.50 - 1.50	0.78	Mostly black organic material, some decayed biota material
ST-5-YR1	9/10/2015	0.50 - 1.50	0.83	Mostly black organic material
ST-5-YR2	9/10/2015	1.00 - 2.50	1.86	Mostly black organic material; material more consolidated as material in other five traps
		Average:	1.17	

Note:

1. Sediment Traps were recovered by Seaway Diving & Salvage Co., Inc. and measurements were processed by ARCADIS.

G:\GE\GE_Silver_Lake_Confidential\Notes and Data\2015 inspections\09 coring\results\Yr 1 sediment traps

ITEM 21 GROUNDWATER MANAGEMENT AREAS PLANT SITE 1 (GMA 1) (GECD310) SEPTEMBER 2015

* All activities described below for this item were conducted pursuant to the Consent Decree.

a. Activities Undertaken/Completed

General:

- Conducted routine groundwater elevation monitoring and non-aqueous-phase liquid (NAPL) monitoring/recovery activities. The thicknesses of LNAPL and DNAPL measured during these activities are shown in Table 21-1.
- Continued routine manual LNAPL and DNAPL removal activities at various wells within GMA 1, as indicated in Tables 21-2 (for LNAPL) and 21-3 (for DNAPL). Note that the DNAPL volume in Table 21-3 includes the manual removal of DNAPL from new DNAPL monitoring well E2SC-03D

Note: The following entries identify additional activities conducted within specific Removal Action Areas within GMA 1.

East Street Area 1-North and South:

- Continued automated recovery operations for groundwater and LNAPL (if recoverable) at the Northside and Southside Caissons (see Table 21-4). No LNAPL was recovered.

East Street Area 2-South:

- Continued automated recovery operations for groundwater and/or LNAPL (if recoverable) from pumping systems 17W, 64R, 64S, 64V, 64X, RW-2(X), RW-1(S), RW-1(X), and RW-4 (see Table 21-5). Automated pumping system RW-3(X) for DNAPL was shut down for maintenance and due to plugging with sand throughout September.
- Continued treatment/discharge of water through the Building 64G Groundwater Treatment Facility (GWTF) (see Table 21-6).

ITEM 21 (cont'd) GROUNDWATER MANAGEMENT AREAS PLANT SITE 1 (GMA 1) (GECD310) SEPTEMBER 2015

a. Activities Undertaken/Completed (cont'd)

Lyman Street Area

 Continued automated recovery operations for groundwater from pumping systems RW-1R, RW- 2, and RW-3 (see Table 21-7). LNAPL recovery (if any) from these pumping systems would be performed manually, but there was no such recovery in September (see Table 21-2).

Newell Street Area II:

- Conducted automated recovery operations for DNAPL at System 2 (which is composed of wells N2SC-01I(R), N2SC-03I(R), and N2SC-14). See Table 21-8.
- Continued optimization efforts (pump cycle adjustment) at automated DNAPL recovery system
 2.

Silver Lake Area:

- Conducted routine monitoring of the lake level and discharges at the outfall as part of the Housatonic river water column monitoring program. (See Item 20.a above.)

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Continue routine groundwater and NAPL monitoring/recovery activities.
- Continue well maintenance and/or survey activities (if any) identified during or since the spring 2015 monitoring event.

ITEM 21 (cont'd) GROUNDWATER MANAGEMENT AREAS PLANT SITE 1 (GMA 1) (GECD310) SEPTEMBER 2015

d. <u>Upcoming Scheduled and Anticipated Activities (next six weeks)</u> (cont'd)

- Install automated DNAPL recovery system in new well E2SC-03D in East Street Area 2-South.
- Conduct the fall 2015 semi-annual long-term groundwater sampling event (October).
- Continue optimization of Newell Street Area II automated recovery system 2 (as necessary).

e. <u>General Progress/Unresolved Issues/Potential Schedule Impacts</u>

No issues.

f. Proposed/Approved Work Plan Modifications

None

Well Name	Date	LNAPL Thickness (feet)	DNAPL Thickness (feet)	
64R	9/3/2015	0.01	0.00	
64R	9/10/2015	0.00	0.00	
64R	9/17/2015	<0.01	0.00	
64R	9/24/2015	0.02	0.00	
64S	9/3/2015	0.00	0.00	
64S	9/10/2015	0.00	0.00	
64S	9/17/2015	0.00	0.00	
64S	9/24/2015	0.00	0.00	
64S-CAISSON	9/3/2015	0.05	0.00	
64S-CAISSON	9/10/2015	0.05	0.00	
64S-CAISSON	9/17/2015	0.03	0.00	
64S-CAISSON	9/24/2015	0.02	0.00	
64V	9/3/2015	0.22	<0.01	
64V	9/10/2015	0.71	<0.01	
64V	9/17/2015	0.27	<0.01	
64V	9/24/2015	0.34	<0.01	
64X(N)	9/3/2015	0.02	0.00	
64X(N)	9/10/2015	0.02	0.00	
64X(N)	9/17/2015	0.02	0.00	
64X(N)	9/24/2015	0.02	0.00	
64X(S)	9/3/2015	0.05	0.00	
64X(S)	9/10/2015	0.05	0.00	
64X(S)	9/17/2015	0.05	0.00	
64X(S)	9/24/2015	0.05	0.00	
64X(W)	9/3/2015	0.10	0.00	
64X(W)	9/10/2015	0.01	0.00	
64X(W)	9/17/2015	0.01	0.00	
64X(W)	9/24/2015	0.02	0.00	
GMA1-17W	9/3/2015	0.04	0.00	
GMA1-17W	9/10/2015	0.05	0.00	
GMA1-17W	9/17/2015	0.15	0.00	
GMA1-17W	9/24/2015	0.03	0.00	
N2SC-01I R	9/3/2015	0.00	0.77	
N2SC-01I R	9/10/2015	0.00	0.80	
N2SC-01I R	9/17/2015	0.00	0.70	
N2SC-01I R	9/24/2015	0.00	0.80	
N2SC-03I R	9/3/2015	0.00	0.84	
N2SC-03I R	9/10/2015	0.00	1.05	
N2SC-031 R	9/17/2015	0.00	0.80	

Well Name	Date	LNAPL. Thickness (feet)	DNAPL Thickness (feet) 0.80	
N2SC-03I R	9/24/2015	0.00		
N2SC-14	9/3/2015	0.00	0.57	
N2SC-14	9/10/2015	0.00	0.74	
N2SC-14	9/17/2015	0.00	0.30	
N2SC-14	9/24/2015	0.00	0.32	
NORTH CAISSON	9/3/2015	0.01	0.00	
NORTH CAISSON	9/10/2015	0.01	0.00	
NORTH CAISSON	9/17/2015	0.01	0.00	
NORTH CAISSON	9/24/2015	0.01	0.00	
RW-1(R)	9/3/2015	<0.01	<0.01	
RW-1(R)	9/10/2015	<0.01	<0.01	
RW-1(R)	9/17/2015	<0.01	<0.01	
RW-1(R)	9/24/2015	<0.01	<0.01	
RW-1(S)	9/3/2015	0.51	0.00	
RW-1(S)	9/10/2015	0.25	0.00	
RW-1(S)	9/17/2015	0.30	0.00	
RW-1(S)	9/24/2015	0.12	0.00	
RW-1(X)	9/3/2015	0.30	0.00	
RW-1(X)	9/10/2015	0.40	0.00	
RW-1(X)	9/17/2015	0.26	0.00	
RW-1(X)	9/24/2015	0.35	0.00	
RW-2	9/3/2015	0.00	0.00	
RW-2	9/10/2015	0.00	0.00	
RW-2	9/17/2015	0.00	0.00	
RW-2	9/24/2015	0.00	0.00	
RW-2(X)	9/3/2015	0.00	0.00	
RW-2(X)	9/10/2015	0.00	0.00	
RW-2(X)	9/17/2015	0.00	0.00	
RW-2(X)	9/24/2015	0.00	0.00	
RW-3	9/3/2015	0,10	0.00	
RW-3	9/10/2015	0.10	0.00	
RW-3	9/17/2015	0.12	0.00	
RW-3	9/24/2015	0.12	0.00	
RW-3(X)	9/3/2015	0.00	1.14	
RW-3(X)	9/10/2015	0.00	0.80	
RW-3(X)	9/17/2015	0.00	0.82	
RW-3(X)	9/24/2015	0.00	0.82	
RW-4	9/3/2015	0.02	0.00	
RW-4	9/10/2015	0.02	0.00	

Well Name	Date	LNAPL Thickness (feet)	DNAPL Thickness (feet)	
RW-4	9/17/2015	0.05	0.00	
RW-4	9/24/2015	0.02	0.00	
SOUTH CAISSON	9/3/2015	0.02	0.00	
SOUTH CAISSON	9/10/2015	0.02	0.00	
SOUTH CAISSON	9/17/2015	0.02	0.00	
SOUTH CAISSON	9/24/2015	0.02	0.00	
E2SC-03S	9/30/2015	0.00	0.00	
E2SC-03I	9/30/2015	0.00	5.52	
E2SC-03D	9/2/2015	NM	4.60	
E2SC-03D	9/4/2015	NM	4.00	
E2SC-03D	9/7/2015	NM	4.70	
E2SC-03D	9/9/2015	NM	4.30	
E2SC-03D	9/11/2015	NM	3.90	
E2SC-03D	9/14/2015	NM	5.60	
E2SC-03D	9/16/2015	NM	4.90	
E2SC-03D	9/18/2015	NM	4.50	
E2SC-03D	9/21/2015	NM	6.70	
E2SC-03D	9/23/2015	NM	5.00	
E2SC-03D	9/25/2015	NM	4.90	
E2SC-03D	9/28/2015	NM	5.20	
E2SC-03D	9/30/2015	NM	5.40	
0	9/30/2015	0.55	0.00	
QQ-R	9/30/2015	0.00	0.00	
U	9/30/2015	0.00	0.00	
Y	9/30/2015	0.00	0.00	
13	9/30/2015	0.35	0.00	
14	9/30/2015	0.00	0.00	
47	9/30/2015	0.43	0.00	
48	9/30/2015	1.74	0.00	
55	9/30/2015	0.95	0.00	
58	9/30/2015	0.00	0.00	
59	9/30/2015	0.00	0.00	
95-04RR	9/30/2015	0.97	0.00	
ESA2S-PZ1	9/30/2015	1.98	0.00	
ESA2S-PZ2	9/30/2015	1.88	0.00	
ESA2S-PZ7	9/30/2015	1.13	0.00	
ES2-14	9/30/2015	0.06	0.00	
ES2-15R	9/30/2015	3.80	0.00	
GMA1-14	9/30/2015	0.00	0.00	

Well Name	Date	LNAPL Thickness (feet)	DNAPL Thickness (feet)	
GMA1-15	9/30/2015	0.93	0.00	
GMA1-16	9/30/2015	0.08	0.00	
GMA1-17E	9/30/2015	0.03	0.00	
GMA1-19	9/30/2015	1.00	0.00	
HR-G2-MW-1	9/30/2015	0.00	0.00	
HR-G2-RW-1	9/30/2015	0.00	0.00	
M-R	9/30/2015	0.00	0.00	
PZ-1S	9/30/2015	0.00	0.00	
PZ-6S	9/30/2015	0.00	0.00	
14-N	9/30/2015	0.24	0.00	
16-N	9/30/2015	0.00	0.00	
17-N	9/30/2015	0.16	0.00	
23-N	9/30/2015	0.08	0.00	
24-N	9/30/2015	0.00	0.00	
105	9/30/2015	0.22	0.00	
106	9/30/2015	0.00	0.00	
107	9/30/2015	0.00	0.00	
140	9/30/2015	0.00	0.00	
ESA1N-25	9/30/2015	0.32	0.00	
ESA1N-PZ-2	9/30/2015	0.42	0.00	
ESA1S-45	9/30/2015	0.19	0.00	
ESA1S-76	9/30/2015	0.09	0.00	
LS-34	9/30/2015	0.00	0.38	
LSSC-08S	9/30/2015	0.00	0.00	
MW-1D	9/30/2015	0.00	0.48	
MW-1S	9/30/2015	0.00	0.48	
N2SC-011	9/30/2015	0.00	3.37	
N2SC-03I	9/30/2015	0.00	0.75	
N2SC-08	9/30/2015	0.00	2.62	
N2SC-13I	9/30/2015	0.00	1.16	
NS-10	9/30/2015	0.64	0.00	
NS-30	9/30/2015	0.00	0.00	
NS-32	9/30/2015	0.00	0.21	
50	9/29/2015	0.31	0.00	
19R	9/29/2015	0.00	0.00	
49R	9/29/2015	0,00	0.00	
49RR	9/29/2015	0.00	0.00	
ES1-08R	9/29/2015	0.00	0.00	
E2SC-23	9/29/2015	0.00	0.00	

Well Name	Date	LNAPL Thickness (feet)	DNAPL Thickness (feet)
E2SC-24	9/29/2015	0.00	0.00
ESA1S-31R	9/29/2015	0.00	0.00
ESA1S-33	9/29/2015	0.00	0.00
ESA1S-34	9/29/2015	0.01	0.00
ESA1S-72	9/29/2015	0.03	0.00
ESA1S-72R	9/29/2015	0.00	0.00
ESA1S-75	9/29/2015	0.00	0.00
ESA2S-PZ3	9/29/2015	0.00	0.00
ESA2S-PZ4	9/29/2015	0.00	0.00
ESA2S-PZ5	9/29/2015	0.00	0.00
ESA2S-PZ6	9/29/2015	1.11	0.00
GMA1-20R	9/29/2015	0.00	0.00
GMA1-21	9/29/2015	0.00	0.00
GMA1-24R	9/29/2015	0.37	0.00
GMA1-30	9/29/2015	0.00	0.00
LS-12	9/29/2015	0.00	0.00
LS-24	9/29/2015	0.00	0.00
LS-30	9/29/2015	0.00	0.12
LS-31	9/29/2015	0.00	0.01
LS-38	9/29/2015	0.00	0.00
LS-38S	9/29/2015	0.00	0.00
LSSC-07	9/29/2015	0.00	0.87
LSSC-08I	9/29/2015	0.00	0.00
LSSC-16I	9/29/2015	0.00	0.00
LSSC-18	9/29/2015	0.00	0.00
N2SC-07	9/29/2015	0.00	0.17

Notes:

1. NM indicates no measurement was taken.

TABLE 21-2
WELL MONITORING AND RECOVERY OF LNAPL
GROUNDWATER MANAGEMENT AREA 1
CONSENT DECREE MONTHLY STATUS REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
September 2015

Well Name	Date	LNAPL Thickness (feet)	LNAPL Removed (gallons)	LNAPL Removed (liters)
RW-1(S)	9/3/2015	0.51	9.00	34.88
RW-1(S)	9/17/2015	0.30	5.00	19.38
11	9/30/2015	0.55	0.09	0.35
13	9/30/2015	0.35	0.06	0.22
47	9/30/2015	0.43	0.07	0.27
48	9/30/2015	1.74	0.28	1.10
55	9/30/2015	0.95	0.15	0.60
95-04RR	9/30/2015	0.97	0.16	0.61
ESA2S-PZ1	9/30/2015	1.98	0.32	1.25
ESA2S-PZ2	9/30/2015	1.88	0.31	1.19
ESA2S-PZ7	9/30/2015	1.13	0.18	0.71
ES2-14	9/30/2015	0.06	0.01	0.04
ES2-15R	9/30/2015	3.80	0.62	2.40
GMA1-15	9/30/2015	0.93	0.15	0.59
GMA1-16	9/30/2015	0.08	0.01	0.05
GMA1-17E	9/30/2015	0.03	0.00	0.02
GMA1-19	9/30/2015	1.00	0.16	0.63
14-N	9/30/2015	0.24	0.04	0.15
17-N	9/30/2015	0.16	0.03	0.10
23-N	9/30/2015	0.08	0.01	0.05
105	9/30/2015	0.22	0.04	0.14
ESA1N-25	9/30/2015	0.32	0.05	0.20
ESA1N-PZ-2	9/30/2015	0.42	0.07	0.27
ESA1S-45	9/30/2015	0.19	0.03	0.12
ESA1S-76	9/30/2015	0.09	0.01	0.06
NS-10	9/30/2015	0.64	0.10	0.40
50	9/29/2015	0.31	0.04	0.16
ESA1S-34	9/29/2015	0.01	0.00	0.01
ESA2S-PZ6	9/29/2015	1.11	0.18	0.69
GMA1-24R	9/29/2015	0.37	0.02	0.09
ESA1S-72	9/29/2015	0.03	0.01	0.02

Total LNAPL Removal for September 2015: 17.2 gallons 66.7 liters

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TABLE 21-3 WELL MONITORING AND RECOVERY OF DNAPL GROUNDWATER MANAGEMENT AREA 1

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS September 2015

Well Name	Date	DNAPL Thickness (feet)	DNAPL Removed (gallons)	DNAPL Removed (liters)
E2SC-03D	9/2/2015	4.60	4.00	15.14
E2SC-03D	9/4/2015	4.00	4.00	15.14
E2SC-03D	9/7/2015	4.70	4.50	17.03
E2SC-03D	9/9/2015	4.30	4.20	15.90
E2SC-03D	9/11/2015	3.90	3.90	14.76
E2SC-03D	9/14/2015	5.60	0.60	2.27
E2SC-03D	9/16/2015	4.90	5.00	18.93
E2SC-03D	9/18/2015	4.50	3.50	13.25
E2SC-03D	9/21/2015	6.70	4.20	15.90
E2SC-03D	9/23/2015	5.00	5.10	19.30
E2SC-03D	9/25/2015	4.90	4.80	18.17
E2SC-03D	9/28/2015	5.20	5.00	18.93
E2SC-03D	9/30/2015	5.40	6.60	24.98
E2SC-031	9/29/2015	5.52	0.86	3.24
RW-3(X)	9/3/2015	1.14	1.00	3.88
LS-34	9/30/2015	0.38	0.06	0.24
MW-1D	9/30/2015	0.48	0.08	0.30
MW-1S	9/30/2015	0.48	0.08	0.30
N2SC-011	9/30/2015	3.37	0.55	2.13
N2SC-031	9/30/2015	0.75	0.12	0.47
N2SC-08	9/30/2015	2.62	0.43	1.65
N2SC-13I	9/30/2015	1.16	0.19	0.73
NS-32	9/30/2015	0.21	0.03	0.13
LS-30	9/29/2015	0.12	0.02	0.08
LS-31	9/29/2015	0.01	0.00	0.01
LSSC-07	9/29/2015	0.87	0.14	0.54
N2SC-07	9/29/2015	0.17	0.17	0.64

Total DNAPL Removal for September 2015:	59.1 gallons	224.0 liters
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TABLE 21-4

AUTOMATED LNAPL & GROUNDWATER RECOVERY SYSTEMS MONTHLY SUMMARY EAST STREET AREA 1 - NORTH & SOUTH GROUNDWATER MANAGEMENT AREA 1

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS September 2015

Caisson	Month	Vol. LNAPL Collected (gallon)	Vol. Water Recovered (gallon)	Percent Downtime
Northside	September 2014	0.0	15,350	
	October 2014	0.0	16,600	
	November 2014	0.0	9,684	4.1 ²
	December 2014	0.0	19,929	
	January 2015	0.0	29,300	
	February 2015	0.0	15,690	
	March 2015	0.0	16,400	
	April 2015	0.0	35,770	
	May 2015	0.0	19,620	
	June 2015	0.0	16,020	
	July 2015	0.0	32,840	
	August 2015	0.0	15,370	
	September 2015	0.0	12,670	
Southside	September 2014	0.0	22,696	
	October 2014	0.0	71,400	
	November 2014	0.0	42,759	
	December 2014	0.0	95,794	
	January 2015	0.0	93,083	
	February 2015	0.0	51,921	
	March 2015	0.0	47,961	
	April 2015	0.0	93,840	
	May 2015	0.0	72,392	
	June 2015	0.0	76,530	
	July 2015	0.0	120,859	
	August 2015	0.0	72,634	
	September 2015	0.0	65,576	

Notes:

1. South Caisson recovery system shutdown on 5/26/14.

2. Northside Caisson depression pump shutdown 11/19/14 through 11/20/14 for maintenance.

TABLE 21-5 AUTOMATED LNAPL/DNAPL & GROUNDWATER RECOVERY SYSTEMS EAST STREET AREA 2 - SOUTH **GROUNDWATER MANAGEMENT AREA 1** CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

September 2015

Recovery System Location	Month	Oll Collected (gallon)	Water Recovered (gallon)	Percent Downtime
17W	September 2014 October 2014 November 2014 December 2014 January 2015 February 2015 March 2015	0.9 1.0 1.0 2.0 1.7 1.0 1.0	(Janon)	
	April 2015 May 2015 June 2015 July 2015 August 2015 September 2015	0.0 0.0 0.1 0.3 0.2 1.4		Note 6
64R	September 2014 October 2014 November 2014 December 2014 January 2015 February 2015 March 2015 April 2015 June 2015 June 2015 August 2015 September 2015	406.3 25.0 19.0 12.5 37.5 25.0 0.0 75.0 75.0 25.1 0.0 100.0 62.5	448,979 11,217 5,409 103,253 733,096 148,554 11,802 784,408 620,209 530,587 925,782 504,348 104,679	
64S System	September 2014 October 2014 November 2014 December 2014 January 2015 February 2015 March 2015 April 2015 June 2015 June 2015 August 2015 September 2015	206.3 25.0 75.0 18.7 200.1 81.3 37.5 293.8 112.6 81.3 222.0 264.9 97.3	581,798 457,587 352,933 506,503 913,637 528,533 437,848 1,058,225 714,223 639,291 1,232,886 675,416 433,530	
64V	September 2014 October 2014 November 2014 December 2014 January 2015 February 2015 March 2015 April 2015 May 2015 June 2015 July 2015 August 2015 September 2015	232.5 324.0 291.0 369.4 294.7 66.5 149.4 444.1 236.6 249.0 564.5 273.9 323.7	794,500 920,200 742,900 781,200 939,500 799,200 721,700 1,120,400 796,800 786,900 1,107,400 780,600 670,800	

TABLE 21-5 AUTOMATED LNAPL/DNAPL & GROUNDWATER RECOVERY SYSTEMS EAST STREET AREA 2 - SOUTH GROUNDWATER MANAGEMENT AREA 1

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS September 2015

Recovery System Location	Month	Oil Collected (gallon)	Water Recovered (gallon)	Percent Downtime
64X	September 2014 October 2014	10.5 21.0	1,223,439 1,239,049	Jonnand
	November 2014	32.0	1,033,438	
3	December 2014	3.9	1,175,611	
	January 2015	18.9	1,308,006	11.43 4
	February 2015	0.0	1,107,572	
	March 2015	0.0	907,686	
	April 2015 May 2015	47.4 0.0	1,516,557 1,155,379	
	June 2015	0.0	1,182,697	
	July 2015	22.0	1,487,839	
	August 2015	3.3	1,160,229	
	September 2015	28.6	953,093	
RW-2(X)	September 2014	0.0	32,308	
	October 2014	0.0	47,558	
	November 2014	0.0	42,476	
	December 2014	0.0 0.0	56,541	
	January 2015 February 2015	0.0	71,420 39,246	11.43 4
	March 2015	0.0	33,633	11.43
	April 2015	0.0	100,312	
	May 2015	0.0	36,000	
	June 2015	0.0	38,448	
	July 2015	0.0	72,567	
	August 2015	0.0	21,499	
	September 2015	0.0	36,228	
RW-1(S)	September 2014	33.0	419,601	
	October 2014	50.0	601,039	
	November 2014 December 2014	See Note 5 See Note 5	465,314 540,582	
	January 2015	See Note 5	670,094	
	February 2015	See Note 5	499,004	
	March 2015	See Note 5	359,911	
	April 2015	See Note 5	741,087	
	May 2015	See Note 5	554,006	
	June 2015	See Note 5	557,992	
	July 2015	See Note 5 See Note 5	822,675	
	August 2015 September 2015	See Note 5	590,439 384,135	
RW-1(X)	September 2014	0.0	217,878	
	October 2014	0.0	264,195	
	November 2014	0.0	205,070	
	December 2014	0.0	226,184	
	January 2015	0.0	265,324	11.43 4
	February 2015	0.0	222,435	
	March 2015	0.0	204,971	
	April 2015	0.0	272,907	
	May 2015 June 2015	0.0 0.0	202,559	
	July 2015	0.0	244,794 264,216	
	August 2015	0.0	210,215	
	September 2015	0.0	188,903	

TABLE 21-5 AUTOMATED LNAPL/DNAPL & GROUNDWATER RECOVERY SYSTEMS EAST STREET AREA 2 - SOUTH GROUNDWATER MANAGEMENT AREA 1

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS September 2015

Recovery		Oil	Water	
System		Collected	Recovered	Percent
Location	Month	(gallon)	(gallon)	Downtime
RW-4	September 2014	2.1	614,797	
	October 2014	0.0	757,158	
	November 2014	13.0	568,895	
	December 2014	18.7	553,525	
	January 2015	16.7	621,319	
	February 2015	0.0	514,670	
	March 2015	0.0	569,222	
	April 2015	0.0	727,436	
	May 2015	0.0	501,406	
	June 2015	14.5	493,541	
	July 2015	10.4	727,657	
	August 2015	16.6	550,231	
	September 2015	2.1	487,261	- <u>1</u> 1 1 1 1 1 1 1
RW-3(X)	September 2014	13.1		
14 16	October 2014	2.0		
	November 2014	0.0		
	December 2014	0.0		
	January 2015	0.0		
	February 2015	0.0		
	March 2015	0.0		
	April 2015	0.0		
	May 2015	0.0		
	June 2015	0.0		100 6
	July 2015	0.0		100 6
	August 2015	0.0		100 6
	September 2015	0.0		100 6

Summary of Total Automated Removal			
Water:	3258629.0	Gallons	
LNAPL:	191.9	Gallons	
DNAPL:	323.7	Gallons	

Notes:

- 1. 64X July 2014 total LNAPL removal is corrected to 48 gallons from 30 as reported in July 2014 CD Monthly Status Report.
- 2. RW-1(X) Drepression pump down 8/1/2014 through 8/4/2014 due to control float failure. (~48 hrs)
- RW-4 Depression pump down from ~ 8:30 PM, 8/9 through ~ 8:00 AM, 8/11. Pump controller fault. (~35.5 hrs)
- January 2015 64X Transfer Pump control system failure caused well shutdowns at 64X(W), RW-1(X) and RW-1(X). Wells were shutdown 1/16 through 1/20.
- 5. Effective November 2014, LNAPL recovery from RW-1(S) is reported as manual recovery and included in the LNAPL Monitoring and Manual Recovery table of the monthly report.
- 6. System shutdown for maintenance.

TABLE 21-6 64G TREATMENT PLANT DISCHARGE DATA GROUNDWATER MANAGEMENT AREA 1

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS September 2015

Date	Housatonic River Discharge (gallons)	Recharge Pond Discharge (gallons)	Total Discharge (gallons)
September 2014	4,049,060	236,427	4,285,487
October 2014	3,578,340	186,262	3,764,602
November 2014	3,410,580	170,736	3,581,316
December 2014	4,374,330	133,638	4,507,968
January 2015	4,583,810	122,915	4,706,725
February 2015	3,415,820	129,568	3,646,388
March 2015	3,444,380	102,651	3,547,031
April 2015	5,520,390	121,777	5,642,167
May 2015	4,788,360	255,416	5,043,776
June 2015	4,583,160	182,662	4,765,822
July 2015	5,919,270	189,726	6,108,996
August 2015	4,676,770	221,821	4,898,591
September 2015	3,256,360	223,773	3,480,133

Note:

After treatment, the majority of the water processed at GE's Building 64G groundwater treatment facility is discharged to the Housatonic River through NPDES permitted Outfall 005. However, as part of GE's overall efforts to contain NAPL within the site and to optimize NAPL recovery operations, a portion of the treated water discharged from the 64G facility is routed to GE's on-site recharge pond located in East Street Area 2-South.

TABLE 21-7 ACTIVE RECOVERY SYSTEMS MONTHLY SUMMARY LYMAN STREET AREA GROUNDWATER MANAGEMENT AREA 1 CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS September 2015

Month / Year	Volume Water Pumped (gallon) ¹	RW-1R LNAPL Recovered (gallon)	RW-3 LNAPL Recovered (gallon)
September 2013	97,956		
October 2013	117,619		
November 2013	84,397		5
December 2013	89,907		
January 2014	141,436		
February 2014	92,501		3.5
March 2014	100,221		
April 2014	166,614		7
May 2014	186,814		
June 2014	123,699		5
July 2014	183,004		8.5
August 2014	128,909		3 ³
September 2014	84,258		4
October 2014	101,477		
November 2014	89,755		See Note 5
December 2014	121,890		See Note 5
January 2015	151,799	***	See Note 5
February 2015	125,905		See Note 5
March 2015	94,437		See Note 5
April 2015	205,706		See Note 5
May 2015	116,987		See Note 5
June 2015	117,200		See Note 5
July 2015	175,482		See Note 5
August 2015	89,870		See Note 5
September 2015	80,994		See Note 5

Notes:

1. Volume of water pumped is total from Wells RW-1R, RW-2, and RW-3.

2. --- indicates NAPL was not recovered by the system.

 For the week ending August 28, 2014, depression pump system float switch failure at Well RW-3. Issues exist with the manufacturer's replacement switches which caused intermittent periods where the system was not functioning. Estimated total downtime for this period is 96 hours (14.29% downtime).

4. For the week ending September 4, 2014, depression pump system float switch failure at Well RW-3. Issues exist with the manufacturer's replacement switches which caused intermittent periods where the system was not functioning. Estimated total downtime for this period is 160 + 167 hours (48.66% downtime).

 Effective November 2014, LNAPL recovery (if any) from RW-3 is reported as manual recovery and included in the LNAPL Monitoring and Manual Recovery table of the monthly report.

TABLE 21-8 ACTIVE DNAPL RECOVERY SYSTEMS MONTHLY SUMMARY NEWELL STREET AREA II GROUNDWATER MANAGEMENT AREA 1

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS September 2015

Recovery System	Date	Total Gallons Recovered
System 2 ⁽¹⁾	September 2014	0.0
104	October 2014	22 ²
	November 2014	03
	December 2014	04
	January 2015	04
	February 2015	04
	March 2015	04
	April 2015	04
	May 2015	0 4
	June 2015	0 4
	July 2015	6.5
	August 2015	1.5
	September 2015	0.1
	September 2015	0.1

Note:

1. System 2 wells are N2SC-01I(R), N2SC-03I(R), and N2SC-14.

2. Recovery system shutdown for maintenance on October 16, 2014 (504 hours/63.64% downtime).

3. Recovery system shutdown for maintenance (672 hours/93.33% downtime).

4. Recovery system shutdown for maintenance (100% downtime).

ITEM 23 GROUNDWATER MANAGEMENT AREAS PLANT SITE 2 (GMA 3) (GECD330) SEPTEMBER 2015

* All activities described below for this item were conducted pursuant to the Consent Decree.

a. Activities Undertaken/Completed

- Conducted routine groundwater elevation monitoring and NAPL monitoring/recovery activities. The thicknesses of LNAPL and DNAPL measured during these activities (if any) are shown in Table 23-1.
- Continued automated recovery operations for LNAPL (where recoverable) by automatic skimmers located in wells 51-21 and GMA3-17 (see Table 23-2).
- Conducted pressure washing of the well screen at well GMA3-17 (September 22, 2015).
- Conducted manual LNAPL removal activities from the wells in this area (see Table 23-3).

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

- Continue routine groundwater and NAPL monitoring/recovery activities.
- Continue well maintenance and/or survey activities (if any) identified during or since the spring 2015 monitoring event.
- Conduct the fall 2015 interim groundwater sampling event (October).
- Complete the design and installation of the sub-slab depressurization system (SSDS) to address potential vapor intrusion in Building 59.

ITEM 23 (cont'd) GROUNDWATER MANAGEMENT AREAS PLANT SITE 2 (GMA 3) (GECD330) SEPTEMBER 2015

e. General Progress/Unresolved Issues/Potential Schedule Impacts

GE will discuss with EPA the scheduling of the next indoor air sampling event in Building 59, which will follow the installation of the SSDS in Building 59.

f. Proposed/Approved Work Plan Modifications

Received EPA's conditional approval of GE's June 12, 2015 Indoor Air Investigation Summary Report for Buildings 51 and 59 for Winter 2015 (September 10, 2015).

TABLE 23-1 ROUTINE WELL MONITORING - LNAPL AND DNAPL THICKNESSES GROUNDWATER MANAGEMENT AREA 3

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS September 2015

Well Name	Date	LNAPL Thickness (feet)	DNAPL. Thickness (feet)
51-08	9/3/2015	1,15	0.00
51-08	9/10/2015	1.10	0.00
51-08	9/16/2015	1.12	0.00
51-08	9/24/2015	1.20	0.00
51-21	9/3/2015	0.10	0.00
51-21	9/10/2015	0.25	0.00
51-21	9/16/2015	0.30	0.00
51-21	9/24/2015	0.38	0.00
GMA3-10	9/3/2015	0.30	0.00
GMA3-10	9/10/2015	0.20	0.00
GMA3-10	9/16/2015	0.14	0.00
GMA3-10	9/24/2015	0.35	0.00
GMA3-12	9/3/2015	0.22	0.00
GMA3-12	9/10/2015	0.45	0.00
GMA3-12	9/16/2015	0.45	0.00
GMA3-12	9/24/2015	0.41	0.00
GMA3-13	9/3/2015	0.06	0.00
GMA3-13	9/10/2015	0.02	0.00
GMA3-13	9/16/2015	0.00	0.00
GMA3-13	9/24/2015	0.00	0.00
GMA3-17	9/3/2015	<0.01	0.00
GMA3-17	9/10/2015	<0.01	0.00
GMA3-17	9/16/2015	<0.01	0.00
GMA3-17	9/24/2015	<0.01	0.00
2A	9/28/2015	0.00	0.00
6B-R	9/28/2015	0.00	0.00
16A	9/28/2015	0.00	0.00
16B-R	9/28/2015	0.00	0.00
16C- R	9/28/2015	0.00	0.00
398-R	9/28/2015	0.00	0.00
39D-R	9/28/2015	0.00	0.00
39E	9/28/2015	0.00	0.00
43A	9/28/2015	0.00	0.00
43B	9/28/2015	0.00	0.00
50B	9/28/2015	0.00	0.00
54B-R	9/28/2015	0.00	0.00
82B-R	9/28/2015	0.00	0.00
89A	9/28/2015	0.00	0.00
89B	9/28/2015	0.00	0.00
89D-R	9/28/2015	0.00	0.00
90A	9/28/2015	0.00	0.00
90B	9/28/2015	0.00	0.00

TABLE 23-1 ROUTINE WELL MONITORING - LNAPL AND DNAPL THICKNESSES GROUNDWATER MANAGEMENT AREA 3

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS September 2015

Well Name	Date	LNAPL Thickness (feet)	DNAPL Thickness (feet)
95A	9/28/2015	0.00	0.00
95B-R	9/28/2015	0.00	0.00
111A-R	9/28/2015	0.00	0.00
111B-R	9/28/2015	0.00	0.00
114A	9/28/2015	0.00	0.00
114B-R	9/28/2015	0.00	0.00
115A	9/28/2015	0.00	0.00
115B	9/28/2015	0.00	0.00
GMA3-2	9/28/2015	0.00	0.00
GMA3-3	9/28/2015	0.00	0.00
GMA3-4	9/28/2015	0.00	0.00
GMA3-5	9/28/2015	0.00	0.00
GMA3-6	9/28/2015	0.00	0.00
GMA3-8	9/28/2015	0.00	0.00
GMA3-9	9/28/2015	0.00	0.00
OBG-2	9/28/2015	0.00	0.00
51-05R	9/28/2015	1.41	0.00
51-06	9/28/2015	0.00	0.00
51-07	9/28/2015	0.00	0.00
51-09	9/28/2015	0.00	0.00
51-11	9/28/2015	0.00	0.00
51-12	9/28/2015	0.00	0.00
51-13	9/28/2015	0.00	0.00
51-14	9/28/2015	0.00	0.00
51-15	9/28/2015	0.37	0.00
51-16R	9/28/2015	0.19	0.00
51-17	9/28/2015	1.41	0.00
51-18	9/28/2015	0.00	0.00
51-19	9/28/2015	1.32	0.00
59-01	9/28/2015	0.00	0.00
59-03R	9/28/2015	0.62	0.00
59-07	9/28/2015	0.02	0.00
078B-R	9/28/2015	0.00	0.00
GMA3-11	9/28/2015	0.00	0.00
GMA3-14	9/28/2015	0.00	0.00
GMA3-16	9/28/2015	0.00	0.00
UB-MW-10R	9/28/2015	0.00	0.00
UB-PZ-3	9/28/2015	0.28	0.00

TABLE 23-2 AUTOMATED LNAPL RECOVERY SYSTEMS MONTHLY SUMMARY GROUNDWATER MANAGEMENT AREA 3

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS September 2015

Recovery Well	Month	Vol. LNAPL Collected (gallons)
51-21	September 2014 ²	1.4
	October 2014	10.0
	November 2014	5.0
	December 2014	2.0
	January 2015	0.3
	February 2015	4.5
	March 2015	12.3
	April 2015	0.9
	May 2015	1,1
	June 2015	6.3
	July 2015	0.0
	August 2015	6.6
	September 2015	13.3
GMA 3-17	September 2014	0.0
	October 2014	0.0
	November 2014	0.0
	December 2014	0.0
	January 2015	0.2
	February 2015	0.3
	March 2015	0.0
	April 2015	0.0
	May 2015	0.1
	June 2015	0.2
	July 2015	0.1
	August 2015	0.0
	September 2015	0.1

Notes:

- 1. As of August 4, 2014, Well 51-21 system down. Skimmer motor not functioning and awaiting manufacturer replacement. Estimated downtime for this period is approximately 576 hours (85.71%)
- On September 3, 2014, Well 51-21 motor replaced and system operating. Estimated downtime for this period is approximately 144 hours (21.43%)

TABLE 23-3 LNAPL MONITORING AND MANUAL RECOVERY GROUNDWATER MANAGEMENT AREA 3

CONSENT DECREE MONTHLY STATUS REPORT GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS September 2015

Well Name	Date	LNAPL Thickness (feet)	LNAPL Removed (galions)	LNAPL Removal (liters)	
51-08	9/3/2015	1.15	0.18	0.69	
51-08	9/10/2015	1.10	0.17	0.66	
51-08	9/16/2015	1.12	0.17	0.67	
51-08	9/24/2015	1.20	0.19	0.72	
GMA3-10	9/3/2015	0.30	0.05	0.18	
GMA3-10	9/24/2015	0.35	0.05	0.21	
GMA3-12	9/10/2015	0.45	0.29	1.13	
GMA3-12	9/16/2015	0.45	0.29	1.13	
GMA3-12	9/24/2015 0.41 0.23		0.23	0.88	
GMA3-13	9/3/2015	0.06	0.01	0.04	
GMA3-13	9/10/2015	0.02	0.00	0.01	
51-05R	9/28/2015	1.41	0.23	0.86	
51-15	9/28/2015	0.37	0.06	0.23	
51-16R	9/28/2015	0.19	0.03	0.12	
51-17	9/28/2015	1.41	0.23	0.87	
51-19	9/28/2015	1.32	0.21	0.80	
59-03R	9/28/2015	0.62	0.10	0.37	
59-07	9/28/2015	0.02	0.00	0.01	
UB-PZ-3	9/28/2015	0.28	0.03	0.12	

and Manual and Andreas and Andre	Total LNAPL	. Removed for	September 2015:	2.5 gallons	9.7 liters
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ITEM 24 GROUNDWATER MANAGEMENT AREAS PLANT SITE 3 (GMA 4) (GECD340) JULY 2015

Note: This Item 24 describes activities conducted at GMA 4 other than those associated with the OPCAs. Activities relating to the OPCA post-closure groundwater monitoring program are described in Item 24A below.

- * All activities described below for this item were conducted pursuant to the Consent Decree.
- a. Activities Undertaken/Completed

None

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

Conduct the fall 2015 semi-annual long-term groundwater monitoring event (October).

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues

f. Proposed/Approved Work Plan Modifications

None

ITEM 24A GROUNDWATER MANAGEMENT AREAS ON-PLANT CONSOLIDATION AREAS POST-CLOSURE PROGRAM SEPTEMBER 2015

Note: In accordance with GE's Revised Post-Removal Site Control Plan for the On-Plant Consolidation Area, approved by EPA on September 26, 2011, a separate post-closure groundwater monitoring program is being implemented for the OPCA monitoring wells. The activities in that program are described in this item.

* All activities described below for this item were conducted pursuant to the Consent Decree.

a. Activities Undertaken/Completed

None

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

d. Upcoming Scheduled and Anticipated Activities (next six weeks)

Conduct the fall 2015 post-closure groundwater sampling event (October).

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues

f. Proposed/Approved Work Plan Modifications

None

Parameter	Sample ID: Date Collected:	005-3Q3M-1X-CP 09/08/15	005-3Q3M-1X-CT 09/08/15	005-3Q3M-1X-GO 09/08/15	005-3Q3M-2X-CP 09/14/15	005-3Q3M-2X-CT 09/14/15	005-3Q3M-2X-GO 09/14/15
/olatile Organics					1		
1,1-Dichloroethane		NA	NA	NA	NA	NA	NA
Chloroethane		NA	NA	NA	NA	NA	NA
PCBs-Unfiltered							
Aroclor-1248		ND(0.000015)	NA	NA	0.000015 J ¹	NA	NA
Aroclor-1254		0.0000076 J ¹	NA	NA	0.000018	NA	NA
Aroclor-1260		ND(0.000015)	NA	NA	0.000040	NA	NA
otal PCBs		0.0000076 J ³	NA	NA	0.000073	NA	NA
Semivolatile Organic	CS						
Ione Detected		NA	NA	NA	NA	NA	NA
Conventional							
Dil & Grease		NA	NA	ND(4.0)	NA	NA	ND(4.0)
Total Suspended Soli	ds	NA	ND(1.00)	NA	NA	ND(1.00)	NA

Parameter	Sample ID: Date Collected:	05AW-3Q-2X-GO 08/11/15	05BW-3Q-2X-GO 08/11/15	005W-3Q-2X-GO 08/11/15	06AW-3Q-2X-GO 08/11/15	006D-3Q3M-1X-CP 09/03/15	006D-3Q3M-1X-GS 09/03/15
Volatile Organics							
1,1-Dichloroethane		NA	NA	NA	NA	NA	NA
Chloroethane		NA	NA	NA	NA	NA	NA
PCBs-Unfiltered							
Aroclor-1248		NA	NA	NA	NA	ND(0.000016)	NA
Aroclor-1254		NA	NA	NA	NA	0.000019	NA
Aroclor-1260		NA	NA	NA	NA	0.000026	NA
Total PCBs		NA	NA	NA	NA	0.000045	NA
Semivolatile Organic	CS						
None Detected		NA	NA	NA	NA	NA	
Conventional							
Dil & Grease		ND(4.1)	ND(4.1)	ND(4.1)	ND(4.1)	NA	NA
Fotal Suspended Soli	ds	NA	NA	NA	NA	NA	NA

	Sample ID:	006D-3Q3M-1X-GV	006D-3Q3M-2X-CP	006D-3Q3M-2X-CT	006D-3Q3M-2X-GO	006D-3Q3M-2X-GS	006D-3Q3M-2X-GV
Parameter	Date Collected:	09/07/15	09/08/15	09/08/15	09/07/15	09/07/15	09/08/15
Volatile Organics	0.0						
1,1-Dichloroethane		ND(0.0010)	NA	NA	NA	NA	ND(0.0010)
Chloroethane		ND(0.0010)	NA	NA	NA	NA	ND(0.0010)
PCBs-Unfiltered							
Aroclor-1248		NA	ND(0.000016)	NA	NA	NA	NA
Aroclor-1254		NA	0.000016	NA	NA	NA	NA
Aroclor-1260		NA	0.000014 J ¹	NA	NA	NA	NA
Total PCBs		NA	0.000030	NA	NA	NA	NA
Semivolatile Organi	CS						
None Detected		NA	NA	NA	NA		NA
Conventional							
Oil & Grease		NA	NA	NA	ND(4.0)	NA	NA
Total Suspended Sol	ids	NA	NA	1.10	NA	NÁ	NA

	Sample ID:	006W-3Q-2X-GO	09B-3Q-3X-CP	09B-3Q-3X-CT	009W-3Q-2X-GO	64G-3Q3M-1X-CP	64G-3Q3M-1X-CT
Parameter	Date Collected:	08/11/15	09/23/15	09/23/15	08/11/15	09/08/15	09/08/15
Volatile Organics							
,1-Dichloroethane		NA	NA	NA	NA	NA	NA
Chloroethane		NA	NA	NA	NA	NA	NA
PCBs-Unfiltered							
Aroclor-1248		NA	ND(0.000016)	NA	NA	ND(0.000016)	NA
Aroclor-1254		NA	0.0000077 J ¹	NA	NA	ND(0.000016)	NA
Aroclor-1260		NA	0.0000083 J ¹	NA	NA	ND(0.000016)	NA
Total PCBs		NA	0.000016 J	NA	NA	ND(0.000016)	NA
Semivolatile Organ	nics						
Ione Detected		NA	NA	NA	NA	ŇA	NA
Conventional		1010					
Dil & Grease		ND(4.1)	NA	NA	ND(4.1)	NA	NA
Total Suspended Sc	olids	NA	NA	1,10	NA	NA	ND(1.00)

Parameter	Sample ID: Date Collected:	64G-3Q3M-1X-GO 09/08/15	64G-3Q3M-1X-GS 09/08/15	64G-3Q3M-1X-GV 09/08/15	64G-3Q3M-2X-CP 09/14/15	64G-3Q3M-2X-CT 09/14/15	64G-3Q3M-2X-GO 09/14/15
Volatile Organics							
1,1-Dichloroethane		NA	NA	0.00035 J	NA	NA	NA
Chloroethane		NA	NA	0.00029 J	NA	NA	NA
PCBs-Unfiltered							
Aroclor-1248		NA	NA	NA	ND(0.000016)	NA	NA
Aroclor-1254		NA	NA	NA	ND(0.000016)	NA	NA
Aroclor-1260		NA	NA	NA	ND(0.000016)	NA	NA
Total PCBs		NA	NA	NA	ND(0.000016)	NA	NA
Semivolatile Organ	ics						
None Detected		NA	-	NA	NA	NA	NA
Conventional							A
Dil & Grease		ND(4.1)	NA	NA	NĂ	NA	ND(4.0)
Fotal Suspended So	lids	NA	NA	NA	NA	ND(1.00)	NA

NPDES PERMIT MONITORING SAMPLING GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS (Results are presented in parts per million, ppm)

	Sample ID:	64G-3Q3M-2X-GS	64G-3Q3M-2X-GV	64TD-3Q3M-1X-CP	64TD-3Q3M-2X-CP	64TD-3Q3M-2X-CT	64TD-3Q3M-2X-GO
Parameter	Date Collected:	09/14/15	09/14/15	09/03/15	09/08/15	09/08/15	09/07/15
Volatile Organics							
1,1-Dichloroethane		NA	0.00027 J	NA	NA	NA	NÁ
Chloroethane		NA	0.00029 J	NA	NA	NA	NA
PCBs-Unfiltered							
Aroclor-1248		NA	NA	0.000040	0.000043	NA	NA
Aroclor-1254		NA	NA	0.000049	0.000052	NA	NA
Aroclor-1260		NA	NA	0.000056	0.000047	NA	NA
Total PCBs		NA	NA	0.000145	0.000142	NA	NA
Semivolatile Organi	cs						
None Detected			NA	NA	NA	NA	NA
Conventional							
Oil & Grease		NA	NA	NA	NA	NA	ND(4.0)
Total Suspended Soli	ids	NA	NA	NA	NA	ND(1.00)	NA

Notes:

1. Samples were collected by General Electric Company, and were submitted to ALS Environmental and SGS Environmental Services, Inc. for analysis of volatiles, PCBs, semivolatiles, oil & grease and total suspended solids.

2. NA - Not Analyzed.

3. ND - Analyte was not detected. The number in parentheses is the associated reporting limit.

4. With the exception of conventional parameters only those constituents detected in one or more samples are summarized.

5. -- Indicates that all constituents for the parameter group were not detected.

Data Qualifiers:

Organics (volatiles, PCBs semivolatiles)

J - Indicates an estimated value between the method detection limit (MDL) and method reporting limit (MRL) - ALS.

J1 - Indicates an estimated value less than the practical quantitation limit (PQL) - SGS Environmental Services, Inc.