



Global Operations, Environment, Health & Safety

1 Plastics Avenue
Pittsfield, MA 01201

June 10, 2019

Mr. Dean Tagliaferro
U.S. Environmental Protection Agency
Region I – New England
c/o Avatar Environmental
10 Lyman Street, Suite 2
Pittsfield, MA 01201
(Via email)

Mr. Michael Gorski
Regional Director
Western Regional Office
Department of Environmental Protection
436 Dwight Street
Springfield, MA 01103
(Via email)

**Re: GE-Pittsfield/Housatonic River Site
Monthly Status Report Pursuant to Consent Decree – May 2019 (GECD900)**

Dear Mr. Tagliaferro and Mr. Gorski:

Enclosed are copies of General Electric's (GE's) monthly progress report for May 2019 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.

Sincerely,

Matthew Calacone
Project Manager

Enclosure

cc: Richard Fisher, EPA (via email)
Robert Cianciarulo, EPA (cover letter only)
Tim Conway, EPA (cover letter only)
Christopher Smith, EPA (via email)
Chris Ferry, ASRC Primus (via email)
Scott Campbell, Avatar Environmental (via email)
Robert Leitch, USACE (via email)
John Ziegler, MDEP (via email)
Eva Tor, MDEP (via email)
Thomas Potter, MDEP (via email)
Nancy E. Harper, MA AG (cover letter only)
Susan Peterson, CT DEEP (via email)
Kenneth Finkelstein, Ph.D., NOAA (via email)
Nate Joyner, City of Pittsfield (via email)
Corydon L. Thurston, Director, Pittsfield Economic Development Authority (via email)
Christopher P. Moccia, UIL Holdings Corp. (via email)
Richard Nasman, P.E., Berkshire Gas (cover letter only)
Andrew Silfer, GE (cover letter only)
Rod McLaren, GE (cover letter only)
James Nuss, Arcadis (via email)
James Bieke, Sidley Austin (via email)
Kevin Russell, Anchor QEA (via email)
GE Internal Repository (1 hard copy)

MAY 2019

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

GENERAL ELECTRIC COMPANY



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 ½-Mile Reach (GECD800)**
- 14. 1½-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 1½-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)
25. Former Oxbows A&C (GECD350)

**GENERAL ACTIVITIES
GE-PITTSFIELD/HOUSATONIC RIVER SITE
(GECD900)
MAY 2019**

a. Activities Undertaken/Completed

Continued GE-EPA electronic data exchanges on the Housatonic River Watershed.

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 Table A-1 attached to this report.

c. Work Plans/Reports/Documents Submitted

Submitted NPDES Discharge Monitoring Reports (DMRs) for the period of April 1 through April 30, 2019 to EPA and MDEP using NetDMR, a web-based application that allows for the electronic submission of DMR data. The upload was performed on May 28, 2019, and a confirmation e-mail was received.

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.

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues.

f. Proposed/Approved Work Plan Modifications

None

**ITEM 1
PLANT AREA
20s, 30s, 40s COMPLEXES
(GECD120)
MAY 2019**

a. Activities Undertaken/Completed

Repairs to the 40s Complex stockpile/embankment, as identified in the October 2018 inspection, were completed in April 2019, but inadvertently not reported in the monthly report for April.*

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

No issues

f. Proposed/Approved Work Plan Modifications

None

**ITEM 2
PLANT AREA
EAST STREET AREA 2-SOUTH
(GEC150)
MAY 2019**

a. **Activities Undertaken/Completed**

Completed repairs to items identified in the October 2018 post-remediation inspection.*

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**

No issues.

f. **Proposed/Approved Work Plan Modifications**

None

**ITEM 3
PLANT AREA
EAST STREET AREA 2-NORTH
(GEC140)
MAY 2019**

a. Activities Undertaken/Completed

- Transferred 2,759 gallons of groundwater and fire protection water from a watermain repair excavation near Building 100 to the Building 64G Groundwater Treatment Facility (GWTF) (May 17, 2019).
- Conducted the 2019 annual inspection of backfilled and paved/slab areas outside the former 19s Complex (May 29, 2019).*

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

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

Begin preparation of a report covering the 2019 annual inspection of backfilled and paved/slab areas outside former 19s Complex (due July 29, 2019).*

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues.

f. Proposed/Approved Work Plan Modifications

None

**ITEM 5
PLANT AREA
HILL 78 & BUILDING 71
CONSOLIDATION AREAS
(GEC210/220)
MAY 2019**

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

a. Activities Undertaken/Completed

- Repairs identified in the 2018 summer/fall post-closure inspection were completed in April 2019, but inadvertently not reported in the monthly report for April.
- During May 2019, 5,975 gallons of leachate were transferred from the Building 71 On-Plant Consolidation Area (OPCA) to the Building 64G Groundwater Treatment Facility (GWTF) for treatment (see attached Table 5-1).
- Conducted spring 2019 post-closure inspection (May 29, 2019).

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

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

- Conduct summer 2019 air monitoring event (July 2019).
- Begin preparation of a report covering the spring 2019 post-closure inspection (due July 29, 2019).

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues

f. Proposed/Approved Work Plan Modifications

None

**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
 MAY 2019**

Month/Year	Total Volume of Leachate Transferred (Gallons)
May 2018	6,000
June 2018	0
July 2018	0
August 2018	0
September 2018	850
October 2018	0
November 2018	0
December 2018	6,000
January 2019	0
February 2019	0
March 2019	0
April 2019	0
May 2019	5,975

Note:

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

**ITEM 7
PLANT AREA
UNKAMET BROOK AREA
(GEC170)
MAY 2019**

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

a. Activities Undertaken/Completed

- Continued the invasive species control program, including weekly inspections during May 2019.
- Conducted the spring 2019 inspection of natural resource restoration/enhancement (NRR/E) measures (May 21, 2019).
- Conducted the spring 2019 non-NRR/E inspection (May 21, 2019)

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

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

- Receive the U.S. Navy's response to the materials previously sent to the Navy relating to GE's request for a renewed access license for the Navy property containing Building OP-3 (Parcel L12-2-2).
- Continue the invasive species control program, including weekly inspections through June 10, 2019 and bi-weekly inspections thereafter, with treatment as necessary.
- Prepare and submit a report on the spring 2019 non-NRR/E inspection (due June 20, 2019).
- Begin preparation of a report on the spring 2019 NRR/E inspection (due August 19, 2019).

e. General Progress/Unresolved Issues/Potential Schedule Impacts

The Conservation Easement and Restriction (CER) for the wetlands east of the former interior landfill will be discussed with the natural resource trustees (Trustees).

**ITEM 7
(cont'd)
PLANT AREA
UNKAMET BROOK AREA
(GEC170)
MAY 2019**

f. Proposed/Approved Work Plan Modifications

None

**ITEM 13
HOUSATONIC RIVER AREA
UPPER ½ MILE REACH
(GEC800)
MAY 2019**

* 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 communications with EPA regarding the February 2019 draft of GE's revised report on the 2017 and 2018 sampling of the sediment cap, including an update of GE's 2007 report on total organic carbon (TOC) in the cap and overall performance of the cap (cap monitoring report); and, after completion of those communications, submit a final version of that report.

e. **General Progress/Unresolved Issues/Potential Schedule Impacts**

The Final Completion Report for the Upper ½-Mile Reach Removal Action will be submitted following EPA review and approval of GE's final cap monitoring report.

f. **Proposed/Approved Work Plan Modifications**

None

**ITEM 14
HOUSATONIC RIVER AREA
1½ MILE REACH
(GECD820)
MAY 2019**

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

a. Activities Undertaken/Completed

Conducted the 2019 spring inspection of parking lots and drains on Parcels I8-10-4, and -5 (May 29, 2019).

b. Sampling/Test Results Received

None

c. Work Plans/Reports/Documents Submitted

None

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

- Begin preparation of a report covering the 2019 spring inspection of parking lots and drains on Parcels I8-10-4, and -5 (due July 29, 2019).
- Conduct July 2019 surface water sampling event at the Pomeroy Avenue Bridge (Location 6A).
- Conduct the 2019 ancillary items inspection (summer 2019).

e. General Progress/Unresolved Issues/Potential Schedule Impacts

No issues.

f. Proposed/Approved Work Plan Modifications

None

**ITEM 15
HOUSATONIC RIVER AREA
REST OF THE RIVER
(GEC850)
MAY 2019**

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

a. Activities Undertaken/Completed

- Continued discussions with EPA regarding issues relating to the Modified RCRA Permit remanded by the Environmental Appeals Board for reconsideration.
- Conducted the second round of spring 2019 surveys of potential vernal pools in the Reach 5A floodplain (May 21-23, 2019), followed by spot checking for hydrology (during the week of May 27, 2019).
- Continued communications with EPA regarding GE's Operation, Monitoring, and Maintenance (OM&M) Plans for Woods Pond Dam and Rising Pond Dam.
- Continued communications with EPA regarding GE's Biota Consumption Advisory Outreach Plan for Massachusetts.

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 regarding issues relating to the Modified RCRA Permit remanded by the Environmental Appeals Board for reconsideration.
- Receive EPA's conditional approval of the OM&M Plan for Woods Pond Dam (submitted in December 2018), and prepare and submit a revised OM&M Plan.
- Continue communications with EPA regarding GE's OM&M Plan for Rising Pond Dam and, upon completion of those communications, receive a conditional approval letter from EPA and then submit a revised OM&M Plan, as well as a design for certain dam modifications.

**ITEM 15
(cont'd)
HOUSATONIC RIVER AREA
REST OF THE RIVER
(GEC850)
MAY 2019**

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

- Continue communications with EPA regarding GE's Biota Consumption Advisory Outreach Plan for Massachusetts and, upon completion of those communications, receive a conditional approval letter from EPA and then submit a revised Plan.
- Submit an interim report on the spring 2019 surveys of potential vernal pools in the Reach 5A floodplain (to be submitted by June 30, 2019).
- Continue discussions with EPA regarding the sediment, surface water, and biota components of GE's Baseline Monitoring Plan.

e. General Progress/Unresolved Issues/Potential Schedule Impacts

- GE's proposed Rest of River Baseline Monitoring Plan remains under discussion with EPA
- Following EPA's conditional approval of the Baseline Monitoring Plan or a direction to submit a revised plan, GE will submit a Field Sampling Plan/Quality Assurance Project Plan for the Rest of River.
- GE's Biota Consumption Advisory Outreach Plan for Connecticut is under EPA review.

f. Proposed/Approved Work Plan Modifications

None

**ITEMS 16 & 17
HOUSATONIC RIVER FLOODPLAIN
RESIDENTIAL AND NON-RESIDENTIAL
PROPERTIES ADJACENT TO 1 ½-MILE REACH
(GECD710 AND 720)
MAY 2019**

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

a. **Activities Undertaken/Completed**

Conducted the Group 4C tree cage inspection (May 29, 2019).

b. **Sampling/Test Results Received**

None

c. **Work Plans/Reports/Documents Submitted**

None

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

Begin preparation of a report covering the Group 4C tree cage inspection (due July 29, 2019).

e. **General Progress/Unresolved Issues/Potential Schedule Impacts**

No issues.

f. **Proposed/Approved Work Plan Modifications**

None

**ITEM 18
HOUSATONIC RIVER FLOODPLAIN
CURRENT RESIDENTIAL PROPERTIES
DOWNSTREAM OF CONFLUENCE
(ACTUAL/POTENTIAL LAWNS)
(GEC730)
MAY 2019**

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

a. **Activities Undertaken/Completed**

Conducted the spring 2019 post-remediation inspection (May 28, 2019).

b. **Sampling/Test Results Received**

None

c. **Work Plans/Reports/Documents Submitted**

None

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

Prepare and submit a report on the spring 2019 post-remediation inspection (due June 27, 2019).

e. **General Progress/Unresolved Issues/Potential Schedule Impacts**

No issues.

f. **Proposed/Approved Work Plan Modifications**

None

**ITEM 20
OTHER AREAS
SILVER LAKE AREA
(GECD600)
MAY 2019**

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

a. **Activities Undertaken/Completed**

Conducted the spring 2019 informal assessment of invasive species (May 6, 2019) and submitted an e-mail report to the Trustees and EPA (May 13, 2019).

b. **Sampling/Test Results Received**

None

c. **Work Plans/Reports/Documents Submitted**

None

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

Conduct the July 2019 surface water sampling event at the Silver Lake Outfall (Location 4A).

e. **General Progress/Unresolved Issues/Potential Schedule Impacts**

No issues.

f. **Proposed/Approved Work Plan Modifications**

None

**ITEM 21
GROUNDWATER MANAGEMENT AREAS
PLANT SITE 1 (GMA 1)
(GECD310)
MAY 2019**

* 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).
- Initiated well maintenance and/or survey activities identified during the spring 2019 monitoring event.
- Resumed the chlorobenzene sampling activities called for in GE's July 27, 2018 revised proposal for development of an alternative risk-based GW-3 for chlorobenzene at wells ES2-02AR and HR-G3-MW-1.

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

Former 20s Complex:

- In accordance with an April 12, 2018 EPA approval to reduce the monitoring of well ES2-19R to monthly, continued monthly monitoring of well ES2-19R.

East Street Area 1-North and South:

- In accordance with Condition 1.a of EPA's December 8, 2017 conditional approval letter for GE's June 16, 2017 *Transmissivity Assessment and Recovery Recommendations for GMAs 1 and 3*, continued monthly LNAPL monitoring of the Northside and Southside Caissons (where the automated recovery systems have been suspended) for potential manual removal utilizing a manual removal criterion of 0.1 foot of LNAPL. No LNAPL above this criterion was found in these caissons.

**ITEM 21
(cont'd)
GROUNDWATER MANAGEMENT AREAS
PLANT SITE 1 (GMA 1)
(GEC310)
MAY 2019**

a. Activities Undertaken/Completed (cont'd)

East Street Area 2-South:

- Continued automated recovery operations for groundwater and/or NAPL (if recoverable) from pumping systems 17W, 64R, 64S, 64V, 64X, RW-2(X), RW-1(S), RW-1(X), RW-4, and E2SC-03D (see Table 21-4).
- Continued treatment/discharge of water through the Building 64G Groundwater Treatment Facility (GWTF) (see Table 21-5).
- Continued monitoring for DNAPL in new well 29R, which replaced well 29. GE will continue monthly monitoring of this well for DNAPL until it proposes otherwise and EPA approves.

Lyman Street Area

- Continued automated recovery operations for groundwater from pumping systems RW-1R, RW-2, and RW-3 (see Table 21-6). LNAPL recovery (if any) from these wells is performed manually. In May 2019, 0.6 gallon of LNAPL was recovered from well RW-3 (see Table 21-2), and no LNAPL was recovered from the other wells.

Newell Street Area II:

- Continued weekly DNAPL monitoring at system 2 (which is composed of wells N2SC-01IR, N2SC-03IR, and N2SC-14) and conducted manual removal of DNAPL at these wells (where necessary) at the frequencies specified for these wells in Condition 9.a of EPA's December 8, 2017 conditional approval letter for GE's June 16, 2017 *Transmissivity Assessment and Recovery Recommendations for GMAs 1 and 3*. In May 2019, 0.97 gallon of DNAPL was removed from these wells.

Silver Lake Area:

- None

**ITEM 21
(cont'd)
GROUNDWATER MANAGEMENT AREAS
PLANT SITE 1 (GMA 1)
(GEC310)
MAY 2019**

b. Sampling/Test Results Received

- See attached tables.
- Preliminary analytical results from the spring 2019 groundwater sampling event were received in May 2019. The spring 2019 groundwater sampling event results will be incorporated into the Monitoring Event Evaluation Report for Spring 2019. The results received this month have been compared to the applicable Method 1 GW-2 and GW-3 groundwater standards and Upper Concentration Limit (UCL) for groundwater set forth in the Massachusetts Contingency Plan (MCP). These comparisons indicate the following:
 - There were no exceedances of the MCP GW-2 standards in any of the groundwater sample results received for GW-2 monitoring wells.
 - The MCP GW-3 standard for chlorobenzene (1 mg/L) was exceeded in groundwater samples collected from GW-3 sentinel well 52 (2.1 mg/L) and GW-3 compliance wells 3-6C-EB-14R, ES2-02AR, and HR-G3-MW-1 (2.9, 2.4 [2.2 in a duplicate], and 2.8 mg/L, respectively). Similar concentrations were previously observed in wells ES2-02AR and HRG3-MW-1. The spring 2019 chlorobenzene result for well 3-6C-EB-14R was a new maximum detected concentration for samples from this well.
 - There were no exceedances of the MCP GW-3 standards in any of the other groundwater sample results received for GW-3 monitoring wells.
 - There were no exceedances of the MCP UCLs in any of these groundwater sample results.

c. Work Plans/Reports/Documents Submitted

None

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

- Continue routine groundwater and NAPL monitoring/recovery activities.
- Complete the chlorobenzene sampling activities called for in GE's July 27, 2018 revised proposal for development of an alternative risk-based GW-3 for chlorobenzene at wells ES2-02AR and HR-G3-MW-1.

**ITEM 21
(cont'd)
GROUNDWATER MANAGEMENT AREAS
PLANT SITE 1 (GMA 1)
(GEC310)
MAY 2019**

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

- Continue well maintenance and/or survey activities identified during the spring 2019 monitoring event.
- Begin preparation of the Monitoring Event Evaluation Report for Spring 2019 (due 60 days from receipt of spring 2019 sampling data or August 31, 2019, whichever is later).

e. General Progress/Unresolved Issues/Potential Schedule Impacts

None

f. Proposed/Approved Work Plan Modifications

None

TABLE 21-1
ROUTINE WELL MONITORING - LNAPL AND DNAPL THICKNESSES
GROUNDWATER MANAGEMENT AREA 1
CONSENT DECREE MONTHLY STATUS REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
May 2019

Well Name	Date	LNAPL Thickness (feet)	DNAPL Thickness (feet)
50	5/29/2019	0.30	0.00
140	5/29/2019	0.00	0.00
19R	5/29/2019	0.00	0.00
29R	5/30/2019	0.00	1.38
49R	5/29/2019	0.00	0.00
49RR	5/29/2019	0.00	0.00
64R	5/2/2019	0.02	0.00
64R	5/8/2019	0.03	0.00
64R	5/16/2019	0.09	0.00
64R	5/23/2019	0.05	0.00
64R	5/30/2019	0.06	0.00
64S	5/2/2019	0.00	0.00
64S	5/8/2019	0.00	0.00
64S	5/16/2019	0.00	0.00
64S	5/23/2019	0.00	0.00
64S	5/30/2019	0.00	0.00
64S-Caisson	5/2/2019	0.04	0.00
64S-Caisson	5/8/2019	0.06	0.00
64S-Caisson	5/16/2019	0.05	0.00
64S-Caisson	5/23/2019	0.03	0.00
64S-Caisson	5/30/2019	0.02	0.00
64V	5/2/2019	0.23	< 0.01
64V	5/8/2019	0.24	< 0.01
64V	5/16/2019	0.24	< 0.01
64V	5/23/2019	0.19	< 0.01
64V	5/30/2019	0.22	< 0.01
64X(N)	5/2/2019	0.02	0.00
64X(N)	5/8/2019	0.02	0.00
64X(N)	5/16/2019	0.02	0.00
64X(N)	5/23/2019	0.02	0.00
64X(N)	5/30/2019	0.02	0.00
64X(S)	5/2/2019	0.03	0.00
64X(S)	5/8/2019	0.03	0.00
64X(S)	5/16/2019	0.03	0.00
64X(S)	5/23/2019	0.03	0.00
64X(S)	5/30/2019	0.03	0.00
64X(W)	5/2/2019	0.02	0.00
64X(W)	5/8/2019	0.02	0.00
64X(W)	5/16/2019	0.03	0.00
64X(W)	5/23/2019	0.03	0.00
64X(W)	5/30/2019	0.03	0.00
E2SC-03D	5/2/2019	0.00	3.50
E2SC-03D	5/8/2019	0.00	2.50
E2SC-03D	5/16/2019	0.00	3.00
E2SC-03D	5/23/2019	0.00	1.10
E2SC-03D	5/30/2019	0.00	1.25
E2SC-03I	5/29/2019	0.00	7.98
E2SC-23	5/29/2019	0.00	0.00
E2SC-24	5/29/2019	0.00	0.00
ES1-08R	5/29/2019	0.00	0.00
ES2-19R	5/29/2019	0.02	0.00
ESA1S-31R	5/29/2019	0.00	0.00
ESA1S-33	5/29/2019	0.00	0.00
ESA1S-34	5/29/2019	0.00	0.00
ESA1S-72	5/29/2019	0.00	0.00
ESA1S-72R	5/29/2019	0.00	0.00
ESA1S-75	5/29/2019	0.00	0.00
ESA2S-PZ3	5/29/2019	0.00	0.00
ESA2S-PZ4	5/29/2019	0.00	0.00
ESA2S-PZ5	5/29/2019	0.00	0.00
ESA2S-PZ6	5/29/2019	0.17	0.00
GMA1-17W	5/2/2019	0.00	0.00
GMA1-17W	5/8/2019	0.01	0.00
GMA1-17W	5/16/2019	0.00	0.00
GMA1-17W	5/23/2019	0.00	0.00
GMA1-17W	5/30/2019	0.00	0.00
GMA1-20R	5/29/2019	0.00	0.00
GMA1-21	5/29/2019	0.00	0.00
GMA1-24R	5/29/2019	0.00	0.00
LS-24	5/29/2019	0.00	0.00
LS-30	5/29/2019	0.00	0.57
LS-31	5/29/2019	0.00	0.08

TABLE 21-1
ROUTINE WELL MONITORING - LNAPL AND DNAPL THICKNESSES
GROUNDWATER MANAGEMENT AREA 1
CONSENT DECREE MONTHLY STATUS REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
May 2019

Well Name	Date	LNAPL Thickness (feet)	DNAPL Thickness (feet)
LS-34	5/29/2019	0.00	<0.01
LS-38	5/29/2019	0.00	0.00
LS-38S	5/29/2019	0.00	0.00
LSSC-07	5/29/2019	0.00	0.46
LSSC-16I	5/29/2019	0.00	0.00
LSSC-18	5/29/2019	0.00	0.00
LSSC-34I	5/29/2019	0.00	0.16
N2SC-01I R	5/1/2019	0.00	0.50
N2SC-01I R	5/7/2019	0.00	0.50
N2SC-01I R	5/16/2019	0.00	0.66
N2SC-01I R	5/24/2019	0.00	0.45
N2SC-01I R	5/30/2019	0.00	0.45
N2SC-03I R	5/1/2019	0.00	0.33
N2SC-03I R	5/7/2019	0.00	0.33
N2SC-03I R	5/16/2019	0.00	0.33
N2SC-03I R	5/24/2019	0.00	0.33
N2SC-03I R	5/30/2019	0.00	0.33
N2SC-07	5/29/2019	0.00	<0.01
N2SC-14	5/1/2019	0.00	2.00
N2SC-14	5/7/2019	0.00	2.00
N2SC-14	5/16/2019	0.00	2.00
N2SC-14	5/24/2019	0.00	2.00
N2SC-14	5/30/2019	0.00	2.00
North Caisson	5/2/2019	0.01	0.00
RW-1(R)	5/1/2019	< 0.01	< 0.01
RW-1(R)	5/8/2019	< 0.01	< 0.01
RW-1(R)	5/16/2019	< 0.01	< 0.01
RW-1(R)	5/23/2019	< 0.01	< 0.01
RW-1(R)	5/30/2019	< 0.01	< 0.01
RW-1(S)	5/2/2019	0.08	0.00
RW-1(S)	5/8/2019	0.02	0.00
RW-1(S)	5/16/2019	0.08	0.00
RW-1(S)	5/23/2019	0.02	0.00
RW-1(S)	5/30/2019	0.05	0.00
RW-1(X)	5/2/2019	0.22	0.00
RW-1(X)	5/8/2019	0.20	0.00
RW-1(X)	5/16/2019	0.21	0.00
RW-1(X)	5/23/2019	0.20	0.00
RW-1(X)	5/30/2019	0.55	0.00
RW-2	5/1/2019	0.00	0.00
RW-2	5/8/2019	0.00	0.00
RW-2	5/16/2019	0.00	0.00
RW-2	5/23/2019	0.00	0.00
RW-2	5/30/2019	0.00	0.00
RW-2(X)	5/2/2019	0.00	0.00
RW-2(X)	5/8/2019	0.00	0.00
RW-2(X)	5/16/2019	0.00	0.00
RW-2(X)	5/23/2019	0.00	0.00
RW-2(X)	5/30/2019	0.00	0.00
RW-3	5/1/2019	0.13	0.00
RW-3	5/8/2019	0.17	0.00
RW-3	5/16/2019	0.02	0.00
RW-3	5/23/2019	0.10	0.00
RW-3	5/30/2019	0.11	0.00
RW-3(X)	5/2/2019	0.00	0.50
RW-3(X)	5/8/2019	0.00	0.50
RW-3(X)	5/16/2019	0.00	0.50
RW-3(X)	5/23/2019	0.00	0.50
RW-3(X)	5/30/2019	0.00	0.50
RW-4	5/2/2019	0.19	0.00
RW-4	5/8/2019	0.19	0.00
RW-4	5/16/2019	0.20	0.00
RW-4	5/23/2019	0.20	0.00
RW-4	5/30/2019	0.20	0.00
South Caisson	5/2/2019	0.03	0.00

**TABLE 21-2
LNAPL MONITORING AND MANUAL RECOVERY
GROUNDWATER MANAGEMENT AREA 1
CONSENT DECREE MONTHLY STATUS REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
May 2019**

Well Name	Date	LNAPL Thickness (feet)	LNAPL Removed (gallons)	LNAPL Removed (liters)
ES2-19R	5/29/2019	0.02	0.00	0.012
ESA2S-PZ6	5/29/2019	0.17	0.03	0.105
50	5/29/2019	0.30	0.05	0.185
RW-3	5/8/2019	0.17	0.60	2.271

Total LNAPL Removal for May 2019: 0.7 gallons 2.6 liters

**TABLE 21-3
 DNAPL MONITORING AND MANUAL RECOVERY
 GROUNDWATER MANAGEMENT AREA 1
 CONSENT DECREE MONTHLY STATUS REPORT
 GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
 May 2019**

Well Name	Date	DNAPL Thickness (feet)	DNAPL Removed (gallons)	DNAPL Removed (liters)
29R	5/30/2019	1.38	0.22	0.851
E2SC-03I	5/29/2019	7.98	1.30	4.923
LS-30	5/29/2019	0.57	0.09	0.352
LSSC-07	5/29/2019	0.46	0.07	0.284
N2SC-01I R	5/16/2019	0.66	0.97	3.671

Total DNAPL Removal for May 2019: 2.7 gallons 10.1 liters

TABLE 21-4
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
MAY 2019

Recovery System Location	Month	Oil Collected (gallon)	Water Recovered (gallon)	Percent Downtime
17W	May 2018	0.2		
	June 2018	1.1		
	July 2018	0.6		
	August 2018	1.3		
	September 2018	0.9		
	October 2018	0.0		
	November 2018	0.0		
	December 2018	0.0		
	January 2019	0.0		
	February 2019	0.0		
	March 2019	0.0		
	April 2019	0.5		
	May 2019	0.2		
64R	May 2018	162.3	820,195	
	June 2018	143.8	696,575	
	July 2018	106.3	155,138	
	August 2018	25.0	605,389	
	September 2018	62.5	760,684	
	October 2018	81.3	905,596	
	November 2018	81.3	788,976	
	December 2018	25.0	538,064	
	January 2019	44.0	726,417	
	February 2019	12.5	498,877	
	March 2019	50.0	286,945	
	April 2019	50.0	818,200	
	May 2019	100.5	1,891,498	
64S System	May 2018	206.3	935,947	
	June 2018	108.3	544,768	
	July 2018	49.8	387,983	
	August 2018	178.5	781,849	
	September 2018	128.8	734,870	
	October 2018	387.5	950,990	
	November 2018	168.8	745,023	
	December 2018	182.6	912,365	
	January 2019	548.8	1,613,940	
	February 2019	375.1	1,108,300	
	March 2019	262.5	813,332	
	April 2019	249.6	872,032	
	May 2019	287.6	1,241,022	
64V	May 2018	464.8	1,071,915	
	June 2018	220.0	484,706	
	July 2018	249.0	671,301	
	August 2018	552.0	906,768	
	September 2018	556.1	713,829	
	October 2018	523.0	886,770	
	November 2018	680.7	1,094,926	
	December 2018	408.4	1,057,449	
	January 2019	518.8	1,142,458	
	February 2019	593.6	889,631	
	March 2019	361.1	902,777	
	April 2019	365.3	850,730	
	May 2019	528.4	1,107,770	

TABLE 21-4
 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
 MAY 2019

Recovery System Location	Month	Oil Collected (gallon)	Water Recovered (gallon)	Percent Downtime
64X	May 2018	4.4	1,339,128	
	June 2018	0.0	945,856	
	July 2018	0.0	910,520	
	August 2018	3.0	1,296,317	
	September 2018	3.9	1,044,840	
	October 2018	10.8	1,082,560	
	November 2018	15.0	1,456,462	
	December 2018	9.7	1,219,151	
	January 2019	21.2	1,539,182	
	February 2019	0.9	1,208,987	
	March 2019	0.0	1,155,531	
	April 2019	8.1	1,084,442	
	May 2019	0.0	1,250,576	
RW-2(X)	May 2018	0.0	53,376	
	June 2018	0.0	1,054	
	July 2018	0.0	35,462	
	August 2018	0.0	10,263	
	September 2018	0.0	52,655	
	October 2018	0.0	124,589	
	November 2018	0.0	58,677	
	December 2018	0.0	91,322	
	January 2019	0.0	48,551	
	February 2019	0.0	65,775	
	March 2019	0.0	14,188	
	April 2019	0.0	22,251	
	May 2019	0.0	12,752	
RW-1(S)	May 2018	0.0	903,330	13.2
	June 2018	23.8	606,450	
	July 2018	49.6	629,603	
	August 2018	34.7	517,837	
	September 2018	15.0	383,020	
	October 2018	0.0	555,221	
	November 2018	14.3	888,885	
	December 2018	15.3	667,277	
	January 2019	26.9	926,892	
	February 2019	30.0	647,294	
	March 2019	70.4	606,748	
	April 2019	44.1	586,126	
	May 2019	16.3	722,234	
RW-1(X)	May 2018	4.3	259,819	
	June 2018	0.5	234,102	
	July 2018	0.5	274,795	
	August 2018	0.5	339,160	
	September 2018	0.8	256,637	
	October 2018	3.3	249,721	
	November 2018	1.2	324,636	
	December 2018	7.4	305,560	
	January 2019	1.9	318,463	
	February 2019	0.0	200,558	
	March 2019	3.6	202,657	
	April 2019	2.1	304,150	
	May 2019	1.4	376,296	

**TABLE 21-4
 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
 MAY 2019**

Recovery System Location	Month	Oil Collected (gallon)	Water Recovered (gallon)	Percent Downtime
RW-4	May 2018	6.3	402,923	
	June 2018	0.0	294,492	
	July 2018	2.1	244,965	
	August 2018	6.2	291,901	
	September 2018	0.0	209,965	
	October 2018	6.3	344,931	
	November 2018	0.0	417,606	
	December 2018	0.0	290,974	
	January 2019	6.2	348,878	
	February 2019	0.0	275,018	
	March 2019	0.0	252,138	
	April 2019	6.2	257,287	
	May 2019	0.0	330,836	
E2SC-03D	May 2018	39.0		
	June 2018	25.3		
	July 2018	25.8		
	August 2018	41.4		
	September 2018	32.7		
	October 2018	32.7		
	November 2018	32.7		
	December 2018	29.9		
	January 2019	35.4		
	February 2019	26.1		
	March 2019	20.7		
	April 2019	30.6		
	May 2019	27.8		

Summary of Total Automated Removal		
Water:	6,932,984.0	Gallons
LNAPL:	934.3	Gallons
DNAPL:	27.8	Gallons

Notes:

1. Effective in March 2016, LNAPL recovery from well RW-1(S) has been reported as automated recovery in this table.
2. The automated groundwater and LNAPL recovery system for RW-1(S) was replaced in October 2018.

**TABLE 21-5
64G TREATMENT PLANT DISCHARGE DATA
GROUNDWATER MANAGEMENT AREA 1
CONSENT DECREE MONTHLY STATUS REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
MAY 2019**

Date	Housatonic River Discharge (gallons)	Recharge Pond Discharge (gallons)	Total Discharge (gallons)
May 2018	4,219,790	239,335	4,459,125
June 2018	3,405,680	259,337	3,665,017
July 2018	2,924,950	273,532	3,198,482
August 2018	3,816,280	185,708	4,001,988
September 2018	3,992,480	149,373	4,141,853
October 2018	4,769,630	175,907	4,945,537
November 2018	4,650,100	116,069	4,766,169
December 2018	5,165,936	49,534	5,215,470
January 2019	5,266,450	49,064	5,315,514
February 2019	4,512,020	0 ²	4,512,020
March 2019	4,293,650	97,425	4,391,075
April 2019	5,037,750	93,322	5,131,072
May 2019	5,920,311	183,254	6,103,565

Note:

1. 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.

2. A consistent layer of ice interfered with the Recharge Pond level controller during February, so no water from 64G was added.

**TABLE 21-6
ACTIVE RECOVERY SYSTEMS MONTHLY SUMMARY
LYMAN STREET AREA
GROUNDWATER MANAGEMENT AREA 1
CONSENT DECREE MONTHLY STATUS REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
MAY 2019**

Month / Year	Volume Water Pumped (gallon) ¹
May 2018	162,973
June 2018	81,140
July 2018	92,934
August 2018	135,500
September 2018	118,662
October 2018	168,498
November 2018	204,173
December 2018 ²	161,822
January 2019	201,878
February 2019	183,448
March 2019	130,874
April 2019	176,433
May 2019	267,381

Notes:

1. The Lyman Street Groundwater Recovery System consists of 3 wells (RW-1R, RW-2, and RW-3), from which groundwater is recovered automatically. LNAPL recovery from these wells, when present, is performed manually and reported in the LNAPL manual recovery table. In May 2019, no LNAPL was recovered from wells RW-1R and RW-2 and 0.6 gallon of LNAPL was recovered from well RW-3 (see Table 21-2).

2. In December 2018, Well RW-1R was shut down for 48 hours to replace the level controller and Well RW-2 was shut down for 24 hours to replace the pump and motor.

**ITEM 22
GROUNDWATER MANAGEMENT AREAS
FORMER OXBOWS J & K (GMA 2)
(GEC320)
MAY 2019**

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

a. **Activities Undertaken/Completed**

- In response to an observation in August 2018, re-surveyed well OJ-MW-1R.
- Decommissioned well J-1R.

b. **Sampling/Test Results Received**

None

c. **Work Plans/Reports/Documents Submitted**

Submitted the GMA 2 Post-Certification Inspection Report for 2019 (May 20, 2019).

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

None

e. **General Progress/Unresolved Issues/Potential Schedule Impacts**

No issues.

f. **Proposed/Approved Work Plan Modifications**

None

**ITEM 23
GROUNDWATER MANAGEMENT AREAS
PLANT SITE 2 (GMA 3)
(GECD330)
MAY 2019**

* 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.
- Conducted automated recovery operations for LNAPL by an automated skimmer located in well 51-21 (see Table 23-2).
- In accordance with Conditions 12 and 14 of EPA's December 8, 2017 conditional approval letter for GE's June 16, 2017 *Transmissivity Assessment and Recovery Recommendations for GMAs 1 and 3*, continued monthly LNAPL monitoring for potential manual removal following the standard removal criteria at well GMA3-17 (where GE has stopped conducting automated recovery) and at wells 51-08, 59-01, 59-03R, 59-07, GMA3-10, and GMA3-12. In May, LNAPL was found above criteria in wells 51-08, 59-03R and GMA3-10, totaling approximately 0.3 gallon, and was removed (see Table 23-3).
- Resumed the chlorobenzene sampling activities called for in GE's October 1, 2018 revised proposal for development of an alternative risk-based GW-3 for chlorobenzene at GMA 3.

b. **Sampling/Test Results Received**

See attached tables.

c. **Work Plans/Reports/Documents Submitted**

None.

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

- Continue routine groundwater and NAPL monitoring/recovery activities at wells where GE has access permission.
- Complete the chlorobenzene sampling activities called for in GE's October 1, 2018 revised proposal for development of an alternative risk-based GW-3 for chlorobenzene at GMA 3.

**ITEM 23
(cont'd)
GROUNDWATER MANAGEMENT AREAS
PLANT SITE 2 (GMA 3)
(GEC330)
MAY 2019**

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

- Conduct the approved well decommissioning activities specified in GE's Revised Long-Term Trend Evaluation Report for Fall 2017, including decommissioning wells 102A and 102C (subject to scheduling with the property owner).
- Begin preparation of the Monitoring Event Evaluation Report for Spring 2019 (due by August 31, 2019).
- Conduct semi-annual Building 59 sub-slab depressurization system (SSDS) monitoring.

e. General Progress/Unresolved Issues/Potential Schedule Impacts

As previously noted, GE has sent to the U.S. Navy materials relating to its request for a renewed access license for the U.S. Navy property containing Building OP-3 (Parcel L12-2-2). Until the renewed access license is executed, GE will not have access to three wells on that property for semi-annual groundwater elevation and NAPL monitoring.

f. Proposed/Approved Work Plan Modifications

None

TABLE 23-1
ROUTINE WELL MONITORING - LNAPL AND DNAPL THICKNESSES
GROUNDWATER MANAGEMENT AREA 3
CONSENT DECREE MONTHLY STATUS REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
May 2019

Well Name	Date	LNAPL Thickness (feet)	DNAPL Thickness (feet)
51-08	5/30/2019	0.39	0.00
51-21	5/1/2019	0.00	0.00
51-21	5/7/2019	0.00	0.00
51-21	5/16/2019	0.00	0.00
51-21	5/23/2019	0.00	0.00
51-21	5/30/2019	0.00	0.00
59-01	5/30/2019	0.00	0.00
59-03R	5/30/2019	0.40	0.00
59-07	5/30/2019	0.00	0.00
78B-R	5/30/2019	0.00	0.00
GMA3-10	5/30/2019	0.75	0.00
GMA3-12	5/30/2019	0.04	0.00
GMA3-17	5/1/2019	0.00	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
MAY 2019

Recovery Well	Month	Vol. LNAPL Collected (gallons)
51-21	May 2018	0.0
	June 2018	3.9
	July 2018	6.6
	August 2018	7.7
	September 2018	1.7
	October 2018	0.4
	November 2018	0.8
	December 2018	0.8
	January 2019	0.9
	February 2019	0.5
	March 2019	0.0
	April 2019	1.4
	May 2019	0.9

Note: In accordance with GE's proposal to conduct transmissivity testing in GMA 3 (approved by EPA's conditional approval letter dated December 5, 2016), GMA 3 recovery wells 51-21 and GMA3-17 were temporarily deactivated during a portion of January 2017 and during February and March 2017 to allow transmissivity testing. These wells were reactivated on April 4, 2017.

1. Recovery system at well GMA3-17 shut down per EPA's December 8, 2017 conditional approval of GE's June 16, 2017 submittal, Groundwater Management Areas 1 and 3, Transmissivity Assessment and Recovery Recommendations (Transmissivity CAL).

TABLE 23-3
LNAPL MONITORING AND MANUAL RECOVERY
GROUNDWATER MANAGEMENT AREA 3
CONSENT DECREE MONTHLY STATUS REPORT
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
May 2019

Well Name	Date	LNAPL Thickness (feet)	LNAPL Removed (gallons)	LNAPL Removed (liters)
51-08	5/30/2019	0.39	0.06	0.241
59-03R	5/30/2019	0.40	0.07	0.247
GMA3-10	5/30/2019	0.75	0.12	0.463

Total LNAPL Removed for May 2019: **0.3 gallons** **1.0 liters**

**ITEM 24
GROUNDWATER MANAGEMENT AREAS
PLANT SITE 3 (GMA 4)
(GECD340)
AND OPCA POST-CLOSURE PROGRAM
MAY 2019**

Note: This item includes activities at GMA 4 as well as those conducted as part of separate post-closure groundwater monitoring program for the On-Plant Consolidation Area (OPCA) wells

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

a. Activities Undertaken/Completed

- Completed the passive diffusion bag deployment and sampling, which was the final activity of the spring 2019 semi-annual monitoring and sampling event.
- Conducted well maintenance and survey activities identified during the fall 2018 monitoring event or required due to well maintenance activities in fall 2018.

b. Sampling/Test Results Received

Preliminary analytical results from the spring 2019 groundwater sampling event were received (other than volatile organic compound results for well OPCA-MW-2R). These results will be incorporated into the Monitoring Event Evaluation Report for Spring 2019. The results received in May 2019 have been compared to the applicable Method 1 GW-2 and GW-3 groundwater standards and UCLs for groundwater set forth in the MCP. These comparisons indicate the following:

- There were no exceedances of the MCP GW-2 standards in any of the results received from GW-2 compliance wells in May.
- The MCP GW-2 benchmark values for tetrachloroethene (0.05 mg/L) and trichloroethene (0.005 mg/L) were exceeded in the groundwater sample collected from well OPCA-MW-1RR (2.2 mg/L and 0.031 mg/L, respectively). Similar concentrations were previously observed in this well.
- There were no exceedances of the MCP GW-2 benchmark values in any of the other groundwater sample results received from GW-3 wells in May.
- There were no exceedances of any MCP GW-3 standards in any of the groundwater sample results received from GW-3 wells in May.
- There were no exceedances of the MCP UCLs for groundwater in any of the groundwater sample results received in May.

**ITEM 24
(cont'd)
GROUNDWATER MANAGEMENT AREAS
PLANT SITE 3 (GMA 4)
(GEC340)
AND OPCA POST-CLOSURE PROGRAM
MAY 2019**

c. **Work Plans/Reports/Documents Submitted**

None

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

Begin preparation of the Long-Term Trend Evaluation Report for Spring 2019 (due 75 days from receipt of data from spring 2019 sampling event).

e. **General Progress/Unresolved Issues/Potential Schedule Impacts**

No issues

f. **Proposed/Approved Work Plan Modifications**

None

**TABLE A-1
DATA RECEIVED DURING MAY 2019**

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

Location ID: Date Collected: Sample Name:	005 04/20/19 005W-2Q-3X-CT_20190420	005 05/07/19 005-2Q2M-1X-CP_20190507	005 05/07/19 005-2Q2M-1X-CT_20190507	005 05/07/19 005-2Q2M-1X-GO_20190507	005 05/13/19 005-2Q2M-2X-GO_20190513
Volatile Organics					
1,4-Dichlorobenzene	NA	NA	NA	NA	NA
Chloroethane	NA	NA	NA	NA	NA
Trichloroethene	NA	NA	NA	NA	NA
Total VOCs	NA	NA	NA	NA	NA
PCBs-Unfiltered					
Aroclor 1248	NA	ND(0.000016)	NA	NA	NA
Aroclor 1254	NA	0.0000086 J ¹	NA	NA	NA
Aroclor 1260	NA	0.0000079 J ¹	NA	NA	NA
Total PCBs	NA	0.000017 J ¹	NA	NA	NA
Semivolatile Organics					
bis(2-Ethylhexyl)phthalate	NA	NA	NA	NA	NA
Butyl benzyl phthalate	NA	NA	NA	NA	NA
Total SVOCs	NA	NA	NA	NA	NA
Conventional					
Oil & Grease	NA	NA	NA	ND(4.2)	ND(4.1)
Total Suspended Solids	ND(1.00)	NA	ND(1.00)	NA	NA

TABLE A-1
DATA RECEIVED DURING MAY 2019

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

Location ID: Date Collected: Sample Name:	005 05/14/19 005-2Q2M-2X-CP_20190514	005 05/14/19 005-2Q2M-2X-CT_20190514	05A 04/20/19 05AW-2Q-3X-CT_20190420	006 04/20/19 006W-2Q-3X-CT_20190420	006 04/22/19 006D-2Q1M-2X-GO_20190422
Volatile Organics					
1,4-Dichlorobenzene	NA	NA	NA	NA	NA
Chloroethane	NA	NA	NA	NA	NA
Trichloroethene	NA	NA	NA	NA	NA
Total VOCs	NA	NA	NA	NA	NA
PCBs-Unfiltered					
Aroclor 1248	0.000024	NA	NA	NA	NA
Aroclor 1254	0.000025	NA	NA	NA	NA
Aroclor 1260	0.000031	NA	NA	NA	NA
Total PCBs	0.000079	NA	NA	NA	NA
Semivolatile Organics					
bis(2-Ethylhexyl)phthalate	NA	NA	NA	NA	NA
Butyl benzyl phthalate	NA	NA	NA	NA	NA
Total SVOCs	NA	NA	NA	NA	NA
Conventional					
Oil & Grease	NA	NA	NA	NA	ND(4.1)
Total Suspended Solids	NA	ND(1.00)	200	122	NA

**TABLE A-1
DATA RECEIVED DURING MAY 2019**

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

Location ID: Date Collected: Sample Name:	006 04/22/19 006D-2Q1M-2X-GS_20190422	006 04/22/19 006D-2Q1M-2X-GV_20190422	006 04/26/19 006D-2Q1M-2X-CP_20190426	006 04/26/19 006D-2Q1M-2X-CT_20190426
Volatile Organics				
1,4-Dichlorobenzene	NA	ND(0.0010)	NA	NA
Chloroethane	NA	ND(0.0010)	NA	NA
Trichloroethene	NA	ND(0.0010)	NA	NA
Total VOCs	NA	ND(0.0010)	NA	NA
PCBs-Unfiltered				
Aroclor 1248	NA	NA	0.000023	NA
Aroclor 1254	NA	NA	0.000049	NA
Aroclor 1260	NA	NA	0.000050	NA
Total PCBs	NA	NA	0.00012	NA
Semivolatile Organics				
bis(2-Ethylhexyl)phthalate	ND(0.0097)	NA	NA	NA
Butyl benzyl phthalate	ND(0.0047)	NA	NA	NA
Total SVOCs	ND(0.0047)	NA	NA	NA
Conventional				
Oil & Grease	NA	NA	NA	NA
Total Suspended Solids	NA	NA	NA	25.4

TABLE A-1
DATA RECEIVED DURING MAY 2019

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

Location ID: Date Collected: Sample Name:	006 04/29/19 006D-2Q1M-3X-CP_20190429	006 04/29/19 006D-2Q1M-3X-CT_20190429	006 05/08/19 006D-2Q2M-1X-GO_20190508	006 05/08/19 006D-2Q2M-1X-GS_20190508
Volatile Organics				
1,4-Dichlorobenzene	NA	NA	NA	NA
Chloroethane	NA	NA	NA	NA
Trichloroethene	NA	NA	NA	NA
Total VOCs	NA	NA	NA	NA
PCBs-Unfiltered				
Aroclor 1248	0.000032	NA	NA	NA
Aroclor 1254	0.000033	NA	NA	NA
Aroclor 1260	0.000032	NA	NA	NA
Total PCBs	0.000096	NA	NA	NA
Semivolatile Organics				
bis(2-Ethylhexyl)phthalate	NA	NA	NA	ND(0.0097)
Butyl benzyl phthalate	NA	NA	NA	ND(0.0047)
Total SVOCs	NA	NA	NA	ND(0.0047)
Conventional				
Oil & Grease	NA	NA	ND(4.1)	NA
Total Suspended Solids	NA	9.80	NA	NA

**TABLE A-1
DATA RECEIVED DURING MAY 2019**

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

Location ID: Date Collected: Sample Name:	006 05/08/19 006D-2Q2M-1X-GV_20190508	006 05/09/19 006D-2Q2M-1X-CP_20190509	006 05/09/19 006D-2Q2M-1X-CT_20190509	006 05/20/19 006D-2Q2M-2X-CP_20190520
Volatile Organics				
1,4-Dichlorobenzene	0.00024 BJ	NA	NA	NA
Chloroethane	ND(0.0010)	NA	NA	NA
Trichloroethene	0.00045 J	NA	NA	NA
Total VOCs	0.00069 J	NA	NA	NA
PCBs-Unfiltered				
Aroclor 1248	NA	0.000013 J ¹	NA	0.000010 J ¹
Aroclor 1254	NA	0.000019	NA	0.000024
Aroclor 1260	NA	0.000028	NA	0.000025
Total PCBs	NA	0.000061 J ¹	NA	0.000059 J ¹
Semivolatile Organics				
bis(2-Ethylhexyl)phthalate	NA	NA	NA	NA
Butyl benzyl phthalate	NA	NA	NA	NA
Total SVOCs	NA	NA	NA	NA
Conventional				
Oil & Grease	NA	NA	NA	NA
Total Suspended Solids	NA	NA	9.70	NA

TABLE A-1
DATA RECEIVED DURING MAY 2019

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

Location ID: Date Collected: Sample Name:	006 05/20/19 006D-2Q2M-2X-CT_20190520	006 05/20/19 006D-2Q2M-2X-GS_20190520	006 05/20/19 006D-2Q2M-2X-GV_20190520	06A 05/10/19 06AW-2Q-1X-CP_20190510	06A 05/10/19 06AW-2Q-1X-CT_20190510
Volatile Organics					
1,4-Dichlorobenzene	NA	NA	0.00023 J	NA	NA
Chloroethane	NA	NA	ND(0.0010)	NA	NA
Trichloroethene	NA	NA	ND(0.0010)	NA	NA
Total VOCs	NA	NA	0.00023 J	NA	NA
PCBs-Unfiltered					
Aroclor 1248	NA	NA	NA	0.00048	NA
Aroclor 1254	NA	NA	NA	0.0012	NA
Aroclor 1260	NA	NA	NA	0.0017	NA
Total PCBs	NA	NA	NA	0.0033	NA
Semivolatile Organics					
bis(2-Ethylhexyl)phthalate	NA	ND(0.0097)	NA	NA	NA
Butyl benzyl phthalate	NA	0.0012 J	NA	NA	NA
Total SVOCs	NA	0.0012 J	NA	NA	NA
Conventional					
Oil & Grease	NA	NA	NA	NA	NA
Total Suspended Solids	10.6	NA	NA	NA	988

**TABLE A-1
DATA RECEIVED DURING MAY 2019**

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

Location ID: Date Collected: Sample Name:	06A 05/10/19 06AW-2Q-1X-GO_20190510	06A 05/20/19 006D-2Q2M-2X-GO_20190520	009 04/20/19 009W-2Q-3X-CT_20190420	09B 04/26/19 09B-2Q-1X-GO_20190426	09B 04/27/19 09B-2Q-1X-CP_20190427
Volatile Organics					
1,4-Dichlorobenzene	NA	NA	NA	NA	NA
Chloroethane	NA	NA	NA	NA	NA
Trichloroethene	NA	NA	NA	NA	NA
Total VOCs	NA	NA	NA	NA	NA
PCBs-Unfiltered					
Aroclor 1248	NA	NA	NA	NA	ND(0.000016)
Aroclor 1254	NA	NA	NA	NA	0.0000088 J ¹
Aroclor 1260	NA	NA	NA	NA	0.0000089 J ¹
Total PCBs	NA	NA	NA	NA	0.000018 J ¹
Semivolatile Organics					
bis(2-Ethylhexyl)phthalate	NA	NA	NA	NA	NA
Butyl benzyl phthalate	NA	NA	NA	NA	NA
Total SVOCs	NA	NA	NA	NA	NA
Conventional					
Oil & Grease	ND(4.1)	ND(4.2)	NA	ND(4.0)	NA
Total Suspended Solids	NA	NA	6.20	NA	NA

**TABLE A-1
DATA RECEIVED DURING MAY 2019**

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

Location ID: Date Collected: Sample Name:	09B 04/27/19 09B-2Q-1X-CT_20190427	64G 05/07/19 64G-2Q2M-1X-CP_20190507	64G 05/07/19 64G-2Q2M-1X-CT_20190507	64G 05/07/19 64G-2Q2M-1X-GO_20190507	64G 05/07/19 64G-2Q2M-1X-GS_20190507
Volatile Organics					
1,4-Dichlorobenzene	NA	NA	NA	NA	NA
Chloroethane	NA	NA	NA	NA	NA
Trichloroethene	NA	NA	NA	NA	NA
Total VOCs	NA	NA	NA	NA	NA
PCBs-Unfiltered					
Aroclor 1248	NA	ND(0.000016)	NA	NA	NA
Aroclor 1254	NA	ND(0.000016)	NA	NA	NA
Aroclor 1260	NA	0.0000032 J ¹	NA	NA	NA
Total PCBs	NA	0.0000032 J ¹	NA	NA	NA
Semivolatile Organics					
bis(2-Ethylhexyl)phthalate	NA	NA	NA	NA	ND(0.0097)
Butyl benzyl phthalate	NA	NA	NA	NA	ND(0.0047)
Total SVOCs	NA	NA	NA	NA	ND(0.0047)
Conventional					
Oil & Grease	NA	NA	NA	ND(4.0)	NA
Total Suspended Solids	ND(1.00)	NA	ND(1.00)	NA	NA

**TABLE A-1
DATA RECEIVED DURING MAY 2019**

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

Location ID: Date Collected: Sample Name:	64G 05/07/19 64G-2Q2M-1X-GV_20190507	64G 05/13/19 64G-2Q2M-2X-GO_20190513	64G 05/13/19 64G-2Q2M-2X-GS_20190513	64G 05/13/19 64G-2Q2M-2X-GV_20190513	64G 05/14/19 64G-2Q2M-2X-CP_20190514
Volatile Organics					
1,4-Dichlorobenzene	ND(0.0010)	NA	NA	ND(0.0010)	NA
Chloroethane	0.0011	NA	NA	0.00063 J	NA
Trichloroethene	ND(0.0010)	NA	NA	ND(0.0010)	NA
Total VOCs	0.0011	NA	NA	0.00063 J	NA
PCBs-Unfiltered					
Aroclor 1248	NA	NA	NA	NA	ND(0.000015)
Aroclor 1254	NA	NA	NA	NA	ND(0.000015)
Aroclor 1260	NA	NA	NA	NA	ND(0.000015)
Total PCBs	NA	NA	NA	NA	ND(0.000015)
Semivolatile Organics					
bis(2-Ethylhexyl)phthalate	NA	NA	0.13	NA	NA
Butyl benzyl phthalate	NA	NA	ND(0.0047)	NA	NA
Total SVOCs	NA	NA	0.13	NA	NA
Conventional					
Oil & Grease	NA	ND(4.1)	NA	NA	NA
Total Suspended Solids	NA	NA	NA	NA	NA

**TABLE A-1
DATA RECEIVED DURING MAY 2019**

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

Location ID: Date Collected: Sample Name:	64G 05/14/19 64G-2Q2M-2X-CT_20190514	64TD 04/22/19 64TD-2Q1M-2X-GO_20190422	64TD 04/26/19 64TD-2Q1M-2X-CP_20190426	64TD 04/26/19 64TD-2Q1M-2X-CT_20190426
Volatile Organics				
1,4-Dichlorobenzene	NA	NA	NA	NA
Chloroethane	NA	NA	NA	NA
Trichloroethene	NA	NA	NA	NA
Total VOCs	NA	NA	NA	NA
PCBs-Unfiltered				
Aroclor 1248	NA	NA	0.000036	NA
Aroclor 1254	NA	NA	0.000029	NA
Aroclor 1260	NA	NA	0.000063	NA
Total PCBs	NA	NA	0.00013	NA
Semivolatile Organics				
bis(2-Ethylhexyl)phthalate	NA	NA	NA	NA
Butyl benzyl phthalate	NA	NA	NA	NA
Total SVOCs	NA	NA	NA	NA
Conventional				
Oil & Grease	NA	ND(4.1)	NA	NA
Total Suspended Solids	ND(1.00)	NA	NA	ND(1.00)

**TABLE A-1
DATA RECEIVED DURING MAY 2019**

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

Location ID: Date Collected: Sample Name:	64TD 04/29/19 64TD-2Q1M-3X-CP_20190429	64TD 04/29/19 64TD-2Q1M-3X-CT_20190429	64TD 05/08/19 64TD-2Q2M-1X-GO_20190508	64TD 05/09/19 64TD-2Q2M-1X-CP_20190509
Volatile Organics				
1,4-Dichlorobenzene	NA	NA	NA	NA
Chloroethane	NA	NA	NA	NA
Trichloroethene	NA	NA	NA	NA
Total VOCs	NA	NA	NA	NA
PCBs-Unfiltered				
Aroclor 1248	0.000056	NA	NA	0.000044
Aroclor 1254	0.000054	NA	NA	0.000031
Aroclor 1260	0.00013	NA	NA	0.000099
Total PCBs	0.00024	NA	NA	0.00017
Semivolatile Organics				
bis(2-Ethylhexyl)phthalate	NA	NA	NA	NA
Butyl benzyl phthalate	NA	NA	NA	NA
Total SVOCs	NA	NA	NA	NA
Conventional				
Oil & Grease	NA	NA	ND(4.1)	NA
Total Suspended Solids	NA	1.00	NA	NA

TABLE A-1
DATA RECEIVED DURING MAY 2019

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

Location ID: Date Collected: Sample Name:	64TD 05/09/19 64TD-2Q2M-1X-CT_20190509	64TD 05/20/19 64TD-2Q2M-2X-CP_20190520	64TD 05/20/19 64TD-2Q2M-2X-CT_20190520	64TD 05/20/19 64TD-2Q2M-2X-GO_20190520
Volatile Organics				
1,4-Dichlorobenzene	NA	NA	NA	NA
Chloroethane	NA	NA	NA	NA
Trichloroethene	NA	NA	NA	NA
Total VOCs	NA	NA	NA	NA
PCBs-Unfiltered				
Aroclor 1248	NA	0.000041	NA	NA
Aroclor 1254	NA	0.000042	NA	NA
Aroclor 1260	NA	0.000072	NA	NA
Total PCBs	NA	0.00016	NA	NA
Semivolatile Organics				
bis(2-Ethylhexyl)phthalate	NA	NA	NA	NA
Butyl benzyl phthalate	NA	NA	NA	NA
Total SVOCs	NA	NA	NA	NA
Conventional				
Oil & Grease	NA	NA	NA	ND(4.2)
Total Suspended Solids	ND(1.00)	NA	ND(1.00)	NA

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, only those constituents detected in one or more samples are summarized.

Data Qualifiers:

Organics (volatiles, PCBs semivolatiles, conventional)

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

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.