



GE Corporate

159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Electronic Mail and Certified Mail

January 9, 2015

Mr. John Ziegler
Bureau of Waste Site Cleanup
Department of Environmental Protection
436 Dwight Street
Springfield, MA 01103

**Re: GE-Pittsfield/Housatonic River Site
East Street Area 2-North (GECD140)
Grant of Environmental Restriction and Easement – Post-Work Notification
Water Line Terminations and Storm Sewer Manhole Repair**

Dear Mr. Ziegler:

In a letter dated August 8, 2014, the General Electric Company (GE) provided advance notice to the Massachusetts Department of Environmental Protection (DEP) regarding a planned “permitted activity” as set forth in the Grant of Environmental Restriction and Easement (the Grant) for East Street Area 2-North within the GE-Pittsfield/Housatonic River Site. The permitted activity, conducted within Tax Parcel Nos. J10-9-2 and J10-9-103, involved soil excavation to support: (1) the termination of two separate fire protection lines in preparation for demolition of Buildings 12T, 100A, and 100, and (2) the repair of an existing storm sewer manhole. This work was conducted within the Other Ground Covering Feature area of the site, pursuant to Subparagraphs 4.C (surface and/or subsurface excavation of 10 cubic yards of soil or less) and 4.D (surface and/or subsurface excavation for Utility Work) of the Grant.

The work was initiated on August 28, 2014 and conducted in a manner as described in GE’s August 8, 2014 letter. The uppermost one foot of soil was excavated, stockpiled separate from the deeper soil excavations, and characterized for off-site disposal. The approximate locations of the completed excavations are shown on Figure 1. Final excavation dimensions for each of the two fire protection lines were approximately 6 feet long, 6 feet wide, and 7 feet deep, and the excavation for the manhole repair was approximately 4 feet long, 4 feet wide, and 2 feet deep. In total approximately 20 cubic yards of material was excavated.

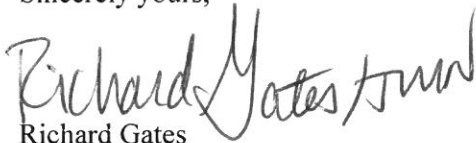
Following the termination and repair activities, the excavations were backfilled, beginning with soil that was excavated from below the one-foot depth. Imported clean soil was used for the uppermost one foot of the excavations. No soil that was excavated from below one foot was used as backfill within the top foot. Asphalt/concrete was then installed to meet surrounding ground surface elevations as needed. The site work was completed on September 12, 2014.

Waste materials generated during the work included approximately 3.3 cubic yard of soil, asphalt/concrete, and brick masonry. Prior to disposal, two sample of the waste materials were collected and analyzed for total PCBs as well as Toxicity Characteristic Leaching Procedure Volatile Organic Compounds, Semi-Volatile Organic Compounds and inorganics. Based on review of the analytical data, the waste materials were transported to the Environmental Quality Company (EQ), Wayne Disposal, Inc. located in Belleville, Michigan for disposal (disposal confirmation was provided by EQ on December 9, 2014). The waste material sampling data and disposal documents are provided in Attachment A.

The Grant requires that, following the completion of such a permitted activity, the Grantor (GE) must provide written notice that the planned work was completed, using Exhibit F, the "Post-Work Notification Form for Property with ERE Grant." A copy of the completed Exhibit F is provided in Attachment A.

Should there be any questions or comments, or if additional information is needed, please contact me at 413-448-5909.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Richard Gates", is written over a horizontal line.

Richard Gates
Senior Project Manager
Global Operations – Environment, Health and Safety

cc: Richard Fisher, USEPA
Michael Backunas, DEP
Rod McLaren, GE
Matthew Calacone, GE
Shannon Reilly, General Dynamics
Chris Ferry, ASRC Primus (electronic)
James Bieke, Sidley Austin
James Nuss, ARCADIS
GE Environmental Library





Attachment A

EXHIBIT F

POST-WORK NOTIFICATION FORM FOR PROPERTY WITH ERE GRANT

I. General Information

Type of work: ☐ Surface (*top foot*) excavation of greater than five (5) cubic feet and less than or equal to ten (10) cubic yards (per Revised Grant Paragraph 4.A)

(*check all that apply*) ☐ Surface (*top foot*) excavation of any volume (per Revised Grant Paragraph 4.B)

☒ Subsurface (*deeper than top foot*) excavation of ten (10) cubic yards or less (per Revised Grant Paragraph 4.C)

☒ Surface or subsurface excavation for Utility Work (per Revised Grant Paragraph 4.D)

☐ Emergency excavation (per Revised Grant Paragraph 8)

Property Address: 1240 Tyler Street, Pittsfield, MA 01201

Tax Parcel ID: J10-9-2

II. Description of Excavation Activities

Start date of excavation/soil disturbance: August 28, 2014

End date of excavation/soil disturbance: September 12, 2014

Amount of soil excavated or moved: 20 cubic yards

Any soil or other excavated material moved out of the Restricted Area? ☒ Yes ☐ No

Excavation dimensions (*approximate length x width x depth, in feet*): 6 ft x 6 ft x 7 ft; 4 ft x 4 ft x 2 ft

Description of project (*attach extra sheets, if necessary*): Locate and terminate two separate fire protection lines in preparation for demolition of Buildings 12T, 100A, and 100B; and repair an existing storm sewer manhole.

Final disposition of soil: (*attach bills of lading and certificates of disposals, if applicable*): Excavated soil was used to backfill the excavation. The top one foot of soil excavated was set aside for disposal. Imported clean soil was used to backfill the remainder of the excavation. Waste disposal manifest is attached.

Attach a plan (*e.g., a copy of the Plan of Restricted Area*) unless previously submitted – or if boundaries of any of the restricted areas have changed, a revised Plan of Restricted Area (if previously submitted, identify date submitted _____) – showing:

- (1) location of excavation(s) within the property
- (2) direction
- (3) major site features (*e.g., roads, buildings, edges of pavement/barriers, locations of utilities if known*)

Attach photographs of work area prior to work, during work and post-restoration work, if available (*optional*).

Was soil sampling and analysis conducted? ☒ Yes ☐ No

If Yes, attach analytical results and show sampling locations (*and indicate depths*) on an attached plan.

Were the Health and Safety Protocol and/or the Soil Management Protocol (as defined in the Revised Grant), if applicable, followed? (check each that applies¹) ☒ Health and Safety Protocol was followed
☒ Soil Management Protocol was followed
☐ Not Applicable

III. Additional Information for Emergency Excavation.

If work was conducted as an Emergency Excavation (see Paragraph 8 ("Emergency Excavation") of the Revised Grant):

- (1) Attach an opinion and completion report prepared by an appropriately trained and licensed professional (including copy of written plan for restoration).
- (2) Date and time property owner first obtained knowledge of the emergency: _____
- (3) Date and time property owner provided oral notification of the emergency to DEP: _____

IV. Signature

Two signatures are required (except for excavations pursuant to Grant Paragraph 4.A or the last paragraph of Revised Grant Paragraph 8, for which only the owner or person conducting the work must sign). The property owner, or person conducting the work if other than the property owner, and the Licensed Site Professional who has overseen the work (where required) must each complete and sign the statement, below.

Owner or person conducting the work if other than the property owner:

I, Richard W. Gates, to the best of my knowledge and belief, state that the material information contained in this submittal is true, accurate and complete.

By: Richard W. Gates

Signature: Richard W. Gates

Name/Title: Senior Project Manager – Global Operations – Environment, Health & Safety

Organization: General Electric Company

Address: 159 Plastics Avenue, Pittsfield, MA 01201

Telephone #: 413-448-5909

Relationship to site: Owner

Licensed Site Professional:

I, James M. Nuss, to the best of my knowledge and belief, state that the material information contained in this submittal is true, accurate and complete.

By: James M. Nuss

Signature: James M. Nuss

Name/Title: Senior Vice President

Organization: Arcadis US, Inc.

¹ See note 3 in Section V ("Notes About the Use of this Form"), below.

Address: 6723 Towpath Road, Syracuse, NY 13214

Telephone #: 315-671-9230

Relationship to site: Licensed Site Professional

V. Notes About the Use of this Form

(1) This form is due no later than thirty (30) days after completion of the permitted activities and uses under Paragraph 4 ("Permitted Activities and Uses") of the ERE Grant. For emergency excavations pursuant to Paragraph 8 of the ERE Grant ("Emergency Excavation"), verbal notification is required as soon as possible but no more than two hours after learning of the emergency, and this form is for the post-emergency excavation notice and is due within ten (10) days after completion of the necessary restoration in accordance with Paragraph 8 of the Revised Grant.

(2) Separate, 15 days' advance written notice is required for Utility Work excavation activity, pursuant to Paragraph 4.D ("Surface and/or Subsurface Excavation for Utility Work") of the Revised Grant.

(3) The Health and Safety Protocol and the Soil Management Protocol do not apply to the Permitted Activities and Uses set forth in Paragraph 4.A ("Surface Excavation of Ten (10) Cubic Yards or Less") of the Revised Grant. These protocols also do not apply to the Permitted Activities and Uses set forth in Paragraph 4.B ("Surface Excavation of any Volume") of the Revised Grant, except for off-Property disposal, to which Paragraph 11 of the Soil Management Protocol applies.

VI. Where to Submit this Form

Submit this completed form, via certified mail, to: MA Department of Environmental Protection
Bureau of Waste Site Cleanup, Special Projects
436 Dwight Street
Springfield, Massachusetts 01103
(Attn.: GE Housatonic Removal Action Project Manager)

Submit a copy of this form, via certified mail, to: U.S. Environmental Protection Agency
Office of Site Remediation and Restoration
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
(Attn.: GE-Pittsfield/Housatonic River Site)

TABLE 1
WASTE MATERIAL SAMPLING RESULTS

EAST STREET AREA 2 - NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Parameter	Sample ID: Date Collected:	Units	12T-1 9/22/2014	Section-10 9/22/2014
PCBs				
Aroclor-1016		ppm	ND(0.319)	ND(0.307)
Aroclor-1221		ppm	ND(0.319)	ND(0.307)
Aroclor-1232		ppm	ND(0.319)	ND(0.307)
Aroclor-1242		ppm	ND(0.319)	ND(0.307)
Aroclor-1248		ppm	ND(0.319)	ND(0.307)
Aroclor-1254		ppm	0.339	0.593
Aroclor-1260		ppm	0.52	1.6
Total PCBs		ppm	0.859	2.193
TCLP VOCs				
1,1-Dichloroethene		ug/L	ND(10)	ND(10)
1,2-Dichloroethane		ug/L	ND(10)	ND(10)
1,4-Dichlorobenzene		ug/L	ND(10)	ND(10)
2-Butanone		ug/L	13.3 J	ND(250)
Benzene		ug/L	ND(10)	ND(10)
Carbon tetrachloride		ug/L	ND(10)	ND(10)
Chlorobenzene		ug/L	ND(10)	ND(10)
Chloroform		ug/L	ND(10)	ND(10)
Tetrachloroethene		ug/L	ND(10)	ND(10)
Trichloroethene		ug/L	ND(10)	ND(10)
Vinyl chloride		ug/L	ND(10)	ND(10)
TCLP SVOCs				
1,4-Dichlorobenzene		mg/L	ND(0.05)	ND(0.05)
2,4,5-Trichlorophenol		mg/L	ND(0.05)	ND(0.05)
2,4,6-Trichlorophenol		mg/L	ND(0.05)	ND(0.05)
2,4-Dinitrotoluene		mg/L	ND(0.05)	ND(0.05)
2-Methylphenol		mg/L	ND(0.05)	ND(0.05)
3- & 4- Methylphenol		mg/L	ND(0.05)	ND(0.05)
Hexachlorobenzene		mg/L	ND(0.05)	ND(0.05)
Hexachlorobutadiene		mg/L	ND(0.05)	ND(0.05)
Hexachloroethane		mg/L	ND(0.05)	ND(0.05)
Nitrobenzene		mg/L	ND(0.05)	ND(0.05)
Pentachlorophenol		mg/L	ND(0.05)	ND(0.05)
Pyridine		mg/L	ND(0.05)	ND(0.05)
TCLP Inorganics				
Arsenic		mg/L	0.0443 B	ND(0.1)
Barium		mg/L	0.241 B	0.198 B
Cadmium		mg/L	0.0276 B	0.0308 B
Chromium		mg/L	0.0143 B	0.009 B
Lead		mg/L	10	0.0991 B
Mercury		mg/L	ND(0.0003)	ND(0.0003)
Selenium		mg/L	0.0978 B	0.0915 B
Silver		mg/L	0.0098 B	0.0102 B

TABLE 1
WASTE MATERIAL SAMPLING RESULTS

EAST STREET AREA 2 - NORTH
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Notes:

1. Samples were collected by General Electric Company subcontractors and submitted to SGS Environmental Services, Inc. for analysis of Polychlorinated Biphenyls and Volatile Organic Compounds, Semi-Volatile Organic Compounds, and Inorganics using the Toxic Characteristic Leaching Procedure.
2. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
3. ppm - parts per million.
4. ug/L - micrograms per liter.
5. mg/L - milligrams per liter.

Data Qualifiers:

- B - Analyte was also detected in the associated method blank at a concentration above the reporting limit.
J - Indicates that the associated numerical value is an estimated concentration.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MAD002084093		2. Page 1 of 1		3. Emergency Response Phone (800) 424-9300		4. Manifest Tracking Number 000813515 VES		
		5. Generator's Name and Mailing Address GENERAL ELECTRIC CO ATTN: MATT CALACONE 159 PLASTICS AVE PITTSFIELD, MA 01201		Generator's Site Address (if different than mailing address) GENERAL ELECTRIC CO 159 PLASTICS AVE PITTSFIELD, MA 01201		<div style="border: 2px solid black; padding: 5px; font-size: 2em; font-weight: bold; transform: rotate(-5deg); display: inline-block;">RECEIVED</div> DEC 8 2014 MAD08484136 By U.S. EPA ID Number				
6. Transporter 1 Company Name EQ NORTHEAST, INC.		7. Transporter 2 Company Name		8. Designated Facility Name and Site Address MICH. DISPOSAL WASTE TREATMENT 49350 N L 94 SERVICE DRIVE BELLEVILLE, MI 48111						U.S. EPA ID Number MID000724831
Facility's Phone: 800 592-5489										
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
						No.	Type			
	X	1. NA3077, HAZARDOUS WASTE, SOLID, n.o.s., (LEAD), 9, III				1	CM	3,345	K	D008
14. Special Handling Instructions and Additional Information SOIL AND DEBRIS WITH LEAD. APPROVAL NUMBER J142210MDI CONTAINER NUMBER 250 + 1) ERG 171 W 586701 MATERIAL FROM SITE EXCAVATIONS C/D REQUIRED PO# 111205804										
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.										
Generator's/Offor's Printed/Typed Name Matthew Calacone Signature Matthew Calacone Month 12 Day 01 Year 14										
TRANSPORTER INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____									
	17. Transporter Acknowledgment of Receipt of Materials									
	Transporter 1 Printed/Typed Name Edward Harper Signature Edward Harper Month 12 Day 01 Year 14 Transporter 2 Printed/Typed Name _____ Signature _____ Month _____ Day _____ Year _____									
DESIGNATED FACILITY	18. Discrepancy									
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
	18b. Alternate Facility (or Generator) _____ Manifest Reference Number: _____ U.S. EPA ID Number _____									
	Facility's Phone: _____									
	18c. Signature of Alternate Facility (or Generator) _____ Month _____ Day _____ Year _____									
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)										
1. H311 2. H314 3. H315 4. H316										
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a										
Printed/Typed Name ML WLS Signature ML WLS Month 12 Day 2 Year 14										

EQ 486

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MAD0002054093	2. Page 1 of 1	3. Emergency Response Phone (800) 424-9300	4. Manifest Tracking Number 000813512 VES
5. Generator's Name and Mailing Address GENERAL ELECTRIC CO ATTN: MATT CALACONE 159 PLASTICS AVE PITTSFIELD, MA 01201			Generator's Site Address (if different than mailing address) GENERAL ELECTRIC CO 159 PLASTICS AVE PITTSFIELD, MA 01201		
Generator's Phone: 413 424-5358			U.S. EPA ID Number MAD0002054093		
6. Transporter 1 Company Name EQ NORTHEAST INC			U.S. EPA ID Number MAD0002054093		
7. Transporter 2 Company Name			U.S. EPA ID Number		
8. Designated Facility Name and Site Address MICH. DISPOSAL WASTE TREATMENT 49350 N I-94 SERVICE DRIVE BELLEVILLE, MI 48111			U.S. EPA ID Number MID0000724831		
Facility's Phone: 800 592-5489					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity
			No.	Type	12. Unit Wt./Vol.
	X	NA3077, HAZARDOUS WASTE, SOLID, n.o.s., (LEAD), 9, III	1	CM	K
13. Waste Codes D008					
14. Special Handling Instructions and Additional Information SOIL AND DEBRIS WITH LEAD. APPROVAL NUMBER J14221QMDI CONTAINER NUMBER 263 + 1) ERG 171 W 286701 MATERIAL FROM Excavations C/D REQUIRED PO# 111205804					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Offor's Printed/Typed Name Matthew Calacone					
Signature <i>Matthew Calacone</i>					
Month Day Year 11 17 14					
INT'L	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____				
	Transporter signature (for exports only): _____ Date leaving U.S.: _____				
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials				
	Transporter 1 Printed/Typed Name JAMES A. ARNO JR				
DESIGNATED FACILITY	Signature <i>James A. Arno Jr</i>				
	Month Day Year 11 17 14				
DESIGNATED FACILITY	18. Discrepancy				
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection				
18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____					
Facility's Phone: _____					
18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)					
1. H070		2. _____		3. _____	
4. _____					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a					
Printed/Typed Name Zack Lishman					
Signature <i>Zack Lishman</i>					
Month Day Year 11 17 14					