RESPONSE TO INTERMEDIATE (60%) DESIGN COMMENTS PROVIDED IN TOWN OF MILFORD'S OCTOBER 31, 2007 LETTER

General: On October 31, 2007, the Town of Milford (Town) submitted comments to the United States Environmental Protection Agency (EPA) on the Intermediate (60%) Design Reports (Intermediate Design Reports) for the low-temperature thermal desorption (LTTD) and off-site disposal (OSD) soil remedies for the Fletcher's Paint Works and Storage Facility Superfund Site in Milford, New Hampshire. The Intermediate Design Reports for the Site were submitted to EPA by the General Electric Company (GE) on June 4 and 12, 2007. On November 1, 2007, EPA provided GE with its comments on the Intermediate Design Reports, for which GE has prepared responses in a separate document. EPA has not yet provided comments on the Town's comments on the Intermediate Design Reports.

In its November 1, 2007 letter, in which EPA provided comments on the Intermediate Design Reports, EPA requested that GE submit a Final (100%) Design Report (Final Design Report) for the OSD soil remedy by December 31, 2007. Therefore, GE is responding to the Town's comments on the Intermediate Design Reports in advance of feedback from EPA on the Town's comments. GE's Final Design Report for the OSD soil remedy incorporates GE's responses to the Town's comments on the Intermediate Design Report for the OSD soil remedy.

Town Introduction: *The Town of Milford (Town) evaluated the Fletcher's Paint Superfund site (site) Draft 60% Remedial Design (60% design) prepared for General Electric (GE) by ARCADIS/BBL. The 60% design included the following two general remedial approaches: 1.) Soil Low Temperature Thermal Desorption (LTTD) identified in the site Record of Decision (ROD), and 2.) Soil Off-Site Disposal (OSD) proposed by GE/ARCADIS/BBL as an alternative to LTTD. Since portions of the LTTD design are identical to the OSD design, the Town's LTTD design comments are not repeated for those LTTD elements common to the OSD design. The following 60% design comments are generally divided into LTTD comments, OSD comments, and comments on related documents. Each comment references the 60% design section.*

Response: No response is required.

"LTTD DESIGN, VOLUME I"

Town Comment 1 - Section 1.3 - Site History and Description: *Page 6 of the site history and description indicated in the first paragraph that a portion of Keyes Memorial Field (Keyes Field) might be used to stage equipment and treated/clean soils.*

Comment: While the Town agreed that a portion of Keyes Field may be used to stage equipment and clean soils, the Town did not agree to allow storing treated soils on Keyes Field, unless it can be demonstrated that the treated soil contaminant concentrations are consistent with clean soils. Clean soils must comply with the treatment goals for surficial soil that the public may be exposed to. Further, the Town did not agree to stage treated soil on portions of the Keyes Field until treated soil testing was conducted to measure treated soils contaminant concentrations.

Based on the 60% design, treated soil that may not comply with soil cleanup levels (SCLs) would be stored on Keyes Field. GE representatives indicated in a September 24, 2007 meeting with the Board of Selectmen that treated soil would be tested after treatment, and if the treated soil did not comply with SCLs, would be returned to the soil treatment unit for further treatment. Treatment would continue until SCLs were achieved. SCLs include soil with polychlorinated biphenyl (PCB) concentrations of 1 part per million (ppm), 25 ppm or 100 ppm based on the site area where treated soils would be placed. Since storing treated soil on Keyes Field would involve managing soil with substantial PCB concentrations of 25 ppm, 100 ppm or greater (for treated soils that did not achieve SCLs), it would not comply with the Town's requirements that only clean material may be placed on Keyes Field. Accordingly, GE/ARCADIS/BBL must revise the 60% design to select an alternate location other than Keyes Field to manage treated soil.

Response: Four scenarios were evaluated during the preliminary design of the LTTD soil remedy. See Appendix C of the Preliminary (30%) Design Report (Preliminary Design Report). The two scenarios determined to be practicable were Scenarios 3 and 4 which both involved the management of treated soil stockpiles in Keyes Field. Scenario 4 would also have involved locating the LTTD system at Keyes Field. Scenario 4 was not recommended largely for that reason. Scenario 3 involves the management of treated soil stockpiles, but not the location of the LTTD system, at Keyes Field. EPA approved with modifications the Preliminary Design Report, including the selection of Scenario 3, in its April 5, 2007 letter. Scenarios 1 and 2 involved the management of treated soil stockpiles at the Elm Street Area and not at Keyes Field. These scenarios were determined to be impracticable.

The Town is correct that the treated soil managed in the stockpiles in Keyes Field might, when tested, show polychlorinated biphenyls (PCBs) above the 1, 25, or 100 milligrams per kilogram (mg/kg) soil cleanup levels (SCLs) specified for re-use at the Elm and/or Mill Street Areas. However, as shown in the Intermediate Design Report for the LTTD soil remedy, the treated soil stockpiles would not be placed directly on Keyes Field; rather, they would be placed on an isolation layer that would be removed at the end of the project. Further, as specified in the Verification Sampling Plan (VSP) included as Appendix A of the Intermediate Design Report, surficial soil samples would be collected in Keyes Park at the end of the project to confirm that the concentration of PCBs is 1 mg/kg or less.

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Town Comment 2 - Section 2.6 - Conceptual Site Model: *Page 30, second bullet, first arrow indicated that the Elm Street Area maximum depth of soil excavation would be to the seasonal low groundwater table elevation.*

Comment: While the ROD indicated that the Elm Street Area maximum depth of soil excavation would be to seasonal low groundwater wherever soil PCB concentrations remain that exceed a concentration of 100 mg/kg, Elm Street Area soil data summarized in the 60% design Figure 5, indicated that there may be substantial areas on the Elm Street site for which soil PCB data are not available to the depth of the seasonal low groundwater table elevation. To assure that the ROD cleanup objectives are achieved, Elm Street Area soil PCB concentrations should be further assessed to confirm that soil PCB concentrations will not remain that exceed a concentration of 100 mg/kg to the depth of the seasonal low groundwater table. The assessment should focus on those site areas where soil PCB concentration data do not extend to the seasonal low groundwater table elevation.

Response: The subject of this comment has been addressed in several previous documents. Pursuant to the Unilateral Administrative Order (UAO) issued on July 16, 2001, GE implemented an EPA-approved Pre-Design Work Plan that included a significant soil investigation at the Elm Street Area. This investigation was based on a grid-based sampling approach. Soil borings were advanced at each of the specified grid nodes to depths intersecting the water table. In the areas between the grid nodes, soil samples were collected to the depths required to delineate the limits of excavation (i.e., the subsurface SCL of 100 mg/kg), and did not extend to the water table. EPA approved with modifications both the Pre-Design Report and the Preliminary Design Report, and did not require additional investigation activities.

As required by EPA, implementation of the VSP will demonstrate that the remedial objectives have been achieved. It is possible that additional excavation will be necessary based on the results of the verification sampling required by the VSP included as Appendix A of the Final Design Report.

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Town Comment 3 - Section 2.6 - Conceptual Site Model: *Page 32, paragraph 2 indicated that confirmation soil testing would not be required in any areas within which the depth of over-excavation is one foot or more.*

Comment: In light of Elm Street Area soil heterogeneities and variable waste disposal techniques and times, it is not clear that site soil contaminant cleanup objectives will be confidently achieved without conducting remaining soil confirmation testing to assure the site meets cleanup goals. Accordingly, the 60 % design should include an analysis indicating that achieving cleanup goals can be assured without confirmation soil testing. If an analysis that assures with a high degree of statistical confidence that SCLs will be achieved cannot be conducted, then soil confirmation testing should be performed.

Response: EPA has already determined that certain locations at the Mill Street Area at which PCBs were reported to be present at concentrations greater than the surface and/or subsurface SCL of 1 mg/kg do not need to be included within the limits of excavation. There are other locations at the Mill Street Area at which PCBs were reported at a concentration greater than 1 mg/kg that are also not fully addressed by the limits of excavation presented in the Intermediate Design Reports. All of these locations and sample results are summarized in Table 9 of the Intermediate Design Reports, and discussed in detail in Section 2.6. Justification of the approach presented in the Final Design Report is presented in GE's submittal to EPA dated March 30, 2007. That submittal also recommended that EPA modify the soil remedy to include institutional controls on three properties located at the Mill Street Area, one of which is owned by the Town. These institutional controls would be similar to those already required for the Town's property at the Elm Street Area, and were incorporated into the Institutional Controls and Access Restrictions Plan (IC/AR Plan) submitted by GE to EPA on July 30, 2007 for the construction and post-construction phases of the project.

As the Town is also aware, there are two locations above the water table at the Elm Street Area at which PCBs were reported at a concentration greater than the surface SCLs of 1 mg/kg that were not fully addressed by the limits of excavation presented in the Intermediate Design Reports. These locations are in the cemetery, which is also owned by the Town. A table has been added to the Final Design Report for the OSD soil remedy that identifies these locations and sample results. The IC/AR Plan submitted by GE on July 30, 2007 recommends that the soil remedy include institutional controls for the cemetery.

GE performed an extensive pre-design investigation under the UAO issued by EPA to characterize the surface and subsurface soils at the Elm and Mill Street Areas and provide the basis for the limits of excavation. This investigation involved the collection and analysis of approximately 1,700 soil samples, and was performed to avoid the need for post-excavation sampling, which, if required, would negatively impact the constructability of either remedy given the severe space constraints at this Site. EPA approved with modifications both the Pre-Design Report and the Preliminary Design Report, and did not require additional investigation activities.

The limits of excavation in the Preliminary Design Report were developed using the conservative approach of identifying the samples containing PCBs in excess of the SCLs and, where practicable, extending the removal limits to the next "clean" point (i.e., a sample with PCBs at or below the applicable SCL). This was done to avoid the need for post-excavation sampling.

Contrary to the Town's assertion that there is a high degree of heterogeneity in the subsurface soils at the Elm Street Area, the vast majority of the pre-design investigation results show continuous exceedances of the 100 mg/kg subsurface SCL extending downward to a depth at which exceedances are no longer observed. With the exception of three borings along the riverbank, there are no soil borings in which several feet of soil containing PCBs at concentrations at or below the 100 mg/kg subsurface SCL are interspersed with several feet of soil containing PCBs at concentrations greater than the subsurface SCL. The three exceptions along the riverbank (i.e., borings ESSB-K16, -L15E, and -L16) are all located within excavation cell V near the northeast corner of the Elm Street Area, and this cell is being excavated to the seasonal low water level. It is

also worth noting that at these three locations, the results that appear anomalous relative to the results at other borings occur at the water table; similar exceedances of the 100 mg/kg subsurface SCL were not observed in other borings that extended down to the water table.

Despite these findings, EPA still required that a VSP be prepared as part of the remedial design. The sampling specified in the VSP involves the collection of approximately 200 soil samples from the excavation bottoms to demonstrate that the remedial objectives have been achieved. (The VSP also proposes the collection of an additional approximately 40 confirmation soil samples for excavation sidewalls at the Elm Street Area.) It is possible that additional excavation will be necessary based on the results of the verification sampling.

In the Intermediate Design Reports, the only locations where confirmation sampling of excavation bottoms was not proposed were where the maximum excavation depth had been achieved (i.e., bedrock at the Mill Street Area and the seasonal low water table at the Elm Street Area), where physical limitations/boundary conditions were intersected (e.g., the cemetery, the southern [i.e., east-bound] lane of Elm Street, the Souhegan River, and the northern rail line at the Mill Street Area), where GE is being required to over-excavate to install an engineered cover system (which is 40 inches thick), and where GE has proposed to over-excavate to establish the required utility corridors and also the tree planting corridors desired by the Town. Confirmation sampling of excavation bottoms was not proposed in the Intermediate Design Reports where the depth of over-excavation was 1 foot or more. Based on EPA's November 1, 2007 comments on those reports, the VSP in the Final Design Report for the OSD soil remedy was modified to require confirmation sampling of excavation bottoms if the depth of over-excavation is less than 2 feet. If EPA requires confirmation sampling even in areas where the over-excavation equals or exceeds 2 feet, then an alternate approach will be considered that is more consistent with that envisioned by the EPA's Record of Decision (ROD). For the alternate approach, the designated utility corridors would be sampled below the excavation required to meet the 100 mg/kg subsurface SCL to determine if the 25 mg/kg SCL set for the utility and tree planting corridors is achieved, and only those soils that do not meet the 25 mg/kg SCL would be excavated and backfilled with imported clean backfill. This sampling could be performed before initiation of the soil remedy, or incrementally after completing the required excavation in the various areas.

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Town Comment 4 - Section 2.6 - Conceptual Site Model: *Page 33 indicated that the riverbank limits of soil removal were determined by extending the base of the Elm Street Area site excavation horizontally until the excavation "daylights" at the excavation base elevation along the riverbank.*

Comment: While this approach for contaminated soil removal has merit, it does not address potential contaminant transport down the exposed riverbank face caused by eroding sediment. Such erosional contaminant transport could carry contaminants down slope below the elevation at which the soil excavation "daylights". Therefore confirmation testing of riverbank soil at the exposed riverbank face below the excavation "daylight" elevation should be conducted to assure that this approach will achieve site cleanup standard.

Response: The limits of excavation presented on Technical Drawings G-10 and G-12 show that at least 1 foot of soil will be removed along the entire riverbank adjacent to the Elm Street Area, including those portions of the riverbank below which adjacent excavation cells "daylight" along the riverbank. Also, as indicated in the response to an EPA comment on the Intermediate Design Reports, the limits of excavation along the riverbank will be revised to extend to the seasonal low water level, as shown by the "low water" mark on Technical Drawings G-10, G-12 through G-14, and S-1; this is consistent with the outer limit of excavation cell V. Finally, the riverbank areas were already included in the verification sampling areas specified in the VSP provided in Appendix A of the Intermediate Design Reports.

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Town Comment 5 - Section 3.3.1 - Elm Street Area: *Page 42 paragraph 1 indicated that access to Keyes Field via Keyes Drive would be closed to the public for the duration of the remedial action.*

Comment: The Town has consistently asserted that a critical remedial action criterion is to complete the remedy in a fashion that allows the continued use of Keyes Field. While the Town has acknowledged that the remedial action may require temporarily closing Keyes Drive for a portion of the remedial action (such as excavating PCB-contaminated soil located beneath Keyes Drive), the Town has required that the remedy include provisions for alternate access to Keyes Field. Such access would be necessary to allow the Town to continue to use Keyes Field, which is an essential recreational resource, and would also provide alternate site access in the event that unanticipated circumstances require site access for health and safety or public health protection. Proceeding with the remedy with only one site access would not provide adequate site access alternatives in the event of a health and safety or public health incident, and would not comply with the Town's requirement that Keyes Field be open for recreational purposes during the remedy.

The Town has offered assistance to GE/ARCADIS/BBL to obtain alternate site access to Keyes Field through the Permattach property. Permattach property representatives have indicated their willingness to work with GE/ARCADIS/BBL and the Town in providing temporary alternate Keyes Field access to allow the remedial action to proceed consistent with the Town's criterion of allowing use of Keyes Field and to provide site health and safety and public health related backup access point. The 60% design should specify the alternate access to Keyes Field. The Town is prepared to assist GE/ARCADIS/BBL in obtaining such site access.

Response: Alternate access to Keyes Field is not required to implement either the OSD soil remedy or the LTTD soil remedy. GE is aware that the Town would prefer to continue using those portions of Keyes Field that are not needed for the soil remedy. GE also recognizes that alternate access to Keyes Field would provide a long-term benefit to the Town. There is already a gate along the west side of Keyes Field adjacent to the former Permattach property, and the Town has been working to obtain an easement for access to Keyes Field through the former Permattach property. If the Town secures this easement from the adjacent property owner, a gravel road could be installed from the existing gate to an existing road within Keyes Field. This road would remain after the soil remedy is completed. The design of the new access road can be submitted if and when the alternate access rights have been secured by the Town and the alignment of the road has been agreed upon. A design for the new access road is not included in the Final Design Report for the OSD soil remedy because it is not required to implement the OSD soil remedy, and the Town has not yet secured the necessary easement over the former Permattach property.

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Town Comment 6 - Section 3.5.1 - Exclusion Zones: *Page 47 paragraph 1 indicated that the treated soil pile would be located in Keyes Field as indicated on Technical Drawing G-5.*

Comment: As previously indicated in comment 1.3 Site History and Description, the Town did not agree to allow staging treated soil on Keyes Field. Further, the area depicted on Figure G-5 where the Town would allow staged material, is substantially larger than the area where clean staged material would be allowed. The Town has agreed to stage clean material in the area from the retaining wall area to the gravel drive. Staging any material in the area between the gravel drive and the ball field would not be acceptable to the Town since it would interfere with the Town's use of Keyes Field.

Response: See the response to Town Comment 1. Also, as indicated in the Intermediate Design Report for the OSD soil remedy and the Remedy Comparison Document, implementation of the OSD soil remedy would not require the use of the area between the gravel drive and the baseball field. That is one of the many benefits of the OSD soil remedy.

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Town Comment 7 - Section 3.13 - Traffic Control Plan: *The Traffic Control Plan appears to be based on a May 10, 2006 report.*

Comment: The Traffic Control Plan does not appear to reflect the Town's May 15, 2007 Traffic Control Plan comments. The 60% design should be revised based the Town's May 2007 comments. This is discussed further in the OSD design comments. A copy of the Town's May 15, 2007 Traffic Control Plan correspondence is attached.

Response: The Truck Route and Traffic Analysis Report (TR/TA Report) presented in Appendix E of the Intermediate Design Reports was based upon information provided in the Preliminary TR/TA Report dated May 10, 2006 prepared by Vanasse Hangen Brustlin, Inc. (VHB). The Preliminary TR/TA Report was previously included in Addendum No.1 to the Preliminary Design Report dated May 11, 2006. The Town's comments on that document were not received until nearly one year later, on May 15, 2007, less than three weeks before the Intermediate Design Report for the LTTD remedy was submitted to EPA. Therefore, it was not possible to address the Town's comments on Addendum No. 1 of the Preliminary Design Report in the Intermediate Design Reports. However, the Town's comments are addressed in the TR/TA Report included in the Final Design Report for the OSD soil remedy.

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Town Comment 8 - Section 4.2 - Installation of Engineering Controls: *Paragraph 1 indicated that the remedial action will not fully address soil samples containing PCBs in excess of the site SCLs.*

Comment: The 60% design should be revised to clarify those areas that will not be cleaned up to SCLs and the reasons for not doing so. The 60% design should specify how the public health, welfare and the environment will be protected while not fully addressing soil samples containing PCBs in excess of the SCLs.

Response: See the response to Town Comment 3.

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Town Comment 9 - Section 4.3.4 - Pre-Excavation and Staging of Materials Located Under Proposed LTTD Treatment System Location: *Page 72, last bullet indicated that treated soil that achieves the subsurface SCL of 1 mg/kg at the Elm Street and Mill Street site, and 25 mg/kg or 100 mg/kg for Elm Street site will be staged at Keyes Field.*

Comment: As indicated in comment 1.3 Site History and Description, the Town does not agree to stage treated soil at Keyes Field. Treated soils containing 100 mg/kg of PCBs (or 25 mg/kg for utility corridor soil) would be inappropriate in this recreational field setting particularly since the Town intends to continue to use Keyes Field for recreational purposes during the remedy. Site soil heterogeneities, variabilities in site waste disposal times and techniques, anticipated variability in LTTD treatment effectiveness, and uncertainty of the representativeness of treated soil sampling indicates it would not be acceptable to the Town to stage treated soil at Keyes Field.

Response: See the response to Town Comment 1.

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Town Comment 10 - Section 4.4 - LTTD Performance Testing: *The first paragraph of this section indicated that LTTD performance testing will not be required.*

Comment: The Town does not agree that LTTD performance testing will not be required. In light of the sensitive LTTD equipment location in the heart of Milford, the Town considers it essential to confirm through performance testing that the LTTD equipment and process will operate efficiently and effectively to protect the public health, welfare and environment of Milford residents and the visiting public.

Response: The referenced statement was taken out of context. Section 4.4 of the Intermediate Design Report for the LTTD soil remedy states that:

> "Performance testing of the LTTD system will not be required if the LTTD system proposed for use at the Site is covered under a National Toxic Substances Control Act (TSCA) Permit. Under such a scenario, all soil treatment would be conducted consistent with the requirements of the system's National TSCA Permit."

The purpose of the performance testing outlined in Section 4.4 is to demonstrate that the system can achieve certain regulatory standards related to the treatment of PCBs. This would be required if the thermal treatment contractor (either the Remedial Action Contractor or a subcontractor) uses an LTTD system that does not have a National TSCA Permit. All of the activities discussed in Section 4.4 would not be required if the thermal treatment contractor uses an LTTD system that has already received a National TSCA Permit. However, in that case, the thermal treatment contractor would still need to perform the clean soil shakedown that is discussed in Section 4.3.6 of the Intermediate Design Report for the LTTD soil remedy. In addition, it would be prudent to also perform some of the activities described in Section 4.4, and the thermal treatment contractor may elect to perform some of those activities. However, should EPA require submittal of a Final Design Report for the LTTD soil remedy, Section 4.4 will be revised to specify those activities that the thermal treatment contractor will be required to perform even if the LTTD system that is used already has a National TSCA Permit. These activities will include performing the impacted soil shakedown (see Section 4.4.3, and Section 4.4.2 for the source of the impacted soil), the pre-test (see Section 4.4.5), various sampling and analyses during the impacted soil shakedown and pre-test (see Section 4.4.6) and, ultimately, determination of the operating parameters for the LTTD system (see Section 4.4.11).

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Town Comment 11 - Section 4.4.1 - Dispersion Modeling: *This section indicated that air dispersion modeling would use actual LTTD stack data from the performance test to match actual conditions.*

Comment: As indicated in the previous comment for the 60% design section 4.4, the Town considers it necessary to conduct performance testing to protect the public health, welfare and environment. Performance testing stack test results should then be available for dispersion modeling.

Response: See the response to Town Comment 10.

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Town Comment 12 - Section 4.4.6 - Emissions, Feed and treated Soil Sampling and Analysis: *The section indicated that emissions sampling would be conducted during the pre-test (if performed) and the performance test (if required) to demonstrate achieving emission performance standards.*

Comment: As previously indicated in these comments, the Town considers it essential to conduct the LTTD pre-test and performance test to demonstrate achievement of emission performance standards.

Response: See the response to Town Comment 10.

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Town Comment 13 - Section 4.6.2 - Influent Characteristics: *This section indicated that the Mill Street temporary water treatment system would not include metals or VOC removal, that metals and VOCs have been predominantly observed in Elm Street Area groundwater, and that liquid waste generated at Elm Street Area may be transported to off-site disposal if it is determined to be more economical than on-site treatment.*

Comment: The 60% design indicated in other sections that Elm Street Area groundwater may be pumped or transported to the Mill Street temporary water treatment system. In light of the Mill Street temporary water system's inability to remove metals and VOCs observed in Elm Street Area groundwater, it may be appropriate to make other provisions to manage and adequately treat Elm Street Area groundwater.

Response: The design of the temporary water treatment system presented in the Intermediate Design Report for the LTTD soil remedy included liquid-phase granular activated carbon (GAC), which would remove certain volatile organic compounds (VOCs), and multi-media and cartridge filters, which would at least remove metals associated with suspended sediment. These treatment units were discussed in Section 4.6.3 of that document. In addition, Technical Drawing M-2 of that document included the possible addition of specific metals and VOC removal steps, although these were not subsequently detailed on Technical Drawings M-3 and M-4.

When the Intermediate Design Reports were submitted on June 4 and 12, 2007, GE had the results of only one round of groundwater sampling and a few treatability samples upon which to base the design of the temporary water treatment system. Since that time, GE has performed two additional sampling events. The results of the first sampling event were presented in the Water Monitoring Report (WMR) submitted to EPA on October 16, 2007. The results of the second event will be reported in a WMR that will be submitted on or about January 23, 2008. The results of this additional testing have been used to refine the basis of design for the temporary water treatment system, and the temporary water treatment system presented in the Final Design Report for the OSD soil remedy has been revised. Notably, a low-profile air stripper was incorporated into the treatment system design for VOC removal. The additional groundwater data do not support the need to add any treatment steps for the removal of dissolved metals.

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Town Comment 14 - Section 4.8.2.3 - LTTD Treatment of Screened Materials: *The section indicated that the LTTD system would be operated at conditions determined by the performance test or at other conditions.*

Comment: As indicated in previous comments, the Town considers it necessary to conduct performance testing to protect the public health, welfare and environment. The performance testing would then set operating conditions for LTTD operation.

Response: See the response to Town Comment 10.

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Town Comment 15 - Section 4.8.2.4 - Management of Treated Soils: *The section indicated that LTTD system treated soil would be staged at Keyes Field until analytical results indicated compliance with SCLs.*

Comment: As indicated in previous comments, the Town agreed only to store clean materials at Keyes Field, and would not agree to storing treated soil at Keyes Field.

Response: See the response to Town Comment 1.

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Town Comment 16 - Section 4.8.3.2 - Vehicle Loading and Transportation of Excavated materials to the Elm Street Area: *The second bullet on page 101 indicated that trucks hauling Mill Street Area excavated soil would not be required to be bed-lined with polyethylene sheeting.*

Comment: Since Mill Street Area excavated soil will include saturated soil excavated from the groundwater zone, it appears that there would be a potential for contaminated groundwater to leak from the truck beds. Therefore the soil should be further treated to remove or absorb water, or the truck beds should be lined or otherwise made watertight for transport of Mill Street Area saturated soils.

Response: Section 4.8.3.2 of the Intermediate Design Reports state that:

> "If the trucks in question are dedicated solely to the transportation of excavated materials from the Mill Street Area to the Elm Street Area, the Remedial Action Contractor will not be required to line the beds with polyethylene sheeting and the trucks will require confirmation sampling upon completion of the remedial action in accordance with the procedures specified in the VSP provided in Appendix A. However, if the trucks will not be dedicated to transporting excavated materials from the Mill Street Area to the Elm Street Area (i.e., they will transport treated soils on the return trip to Mill Street), the beds of each truck will be lined prior to the loading of such materials."

Further, the Intermediate Design Reports indicate that Mill Street Area excavations that extend below the water table will be dewatered prior to excavation. While complete dewatering of all soils prior to excavation is unrealistic, Section 4.7.5 of the remedial designs anticipate that the excavated soils will pass the paint filter test either upon excavation or following limited mixing of such soils with overlying soils excavated from above the water table or drying agents.

Regardless, the forthcoming Remedial Action Work Plan (RAWP) will have contractor-specific requirements for the handling of excavated materials. Those requirements will specify that any soils transported off-site from the Mill Street Area and/or from the Mill Street Area to the Elm Street Area will pass the paint filter test before transport, either prior to or following the conditioning of such soils with soils excavated from above the water table or other drying agents that would not impact the LTTD treatment process. The transported soils will not have free liquids.

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Town Comment 17 - Section 5.2 - Backfilling of Excavations: *The second bullet on page 112 indicated that over-excavated areas in the utility and tree-planting corridor would not be subject to confirmation sampling if the over-excavation depth is 1 foot or more.*

Comment: If confirmation sampling is not conducted in those utility and tree planting corridors where 1 foot or more of soil is over excavated, the design should include an assessment and assurance that the soil underlying the excavations will comply with SCLs. If such assurances of compliance with SCLs cannot be given, then confirmation sampling should be conducted.

Response: See the response to Town Comment 3.

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Town Comment 18 - Section 5.2 - Backfilling of Excavations: *The last paragraph of this section indicated that the Remedial Action Contractor must ensure that over-excavated soils or imported backfill are generally free from unsuitable material.*

Comment: Since backfill material suitability will be important to the stability and long-term integrity of the Elm Street and Mill Street Areas, it is important that backfill material be free (and not generally free) of unsuitable material. Further, the backfill material specifications should be provided for the Remedial Action Contractor.

Response: The cited text has been revised to remove the word "generally." A Technical Specification for the backfill material is provided in the Final Design Report for the OSD soil remedy, and will be part of any bid documents provided to prospective contractors.

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Town Comment 19 - Section 5.3 - Protection and Restoration of Utilities: *Page 113 paragraph 2 indicated that the Town's February 8, 1999 Consent Decree with EPA required the Town to provide the materials, specifications and manufacturer of the stormwater utility that runs under the east portion of the Elm Street Area.*

Comment: The Town's Consent Decree requires only that the Town provide "a replacement drainage pipe". The Town is not responsible for stormwater utility materials other than the pipe. Further, the 60% design must specify the stormwater utility materials, which should be consistent with Town utility construction requirements.

Response: The cited text from the Intermediate Design Reports is taken out of context. Section 5.3 states:

> "As indicated in the ROD and specified in Section VI.9.B of the Town's February 8, 1999 Consent Decree with EPA, the Town is responsible for providing the materials of construction for the replacement storm sewer. Therefore, the pipe and manhole sizes, materials of construction and manufacturer will be specified by the Town. The Design Engineer and/or the Remedial Action Contractor will coordinate with the Town (on behalf of GE) regarding the restoration of this utility."

GE does not expect the Town to provide the bedding materials for the replacement storm sewer, or the backfill material; those would be provided by GE. GE would also be responsible for performing the actual replacement, including the excavation, installation, and backfilling. However, GE does expect the Town to provide the "hardware" needed for the drainage system including connections, subsurface structures at turns, riser sections above those structures and manhole structures with covers at the top of the risers. Incorporation of these items would be standard engineering and/or construction practice. We also confirmed the need for these components with the Town's Department of Public Works on November 13, 2007. Moreover, these other elements are required by the Town's standard specification package, which ARCADIS BBL purchased from the Town on November 13, 2007.

It is also noted that GE has proposed, in its Intermediate Design Reports, to perform non-remedial work that will correct an existing problem for the Town. Specifically, as shown on Technical Drawing G-20 in Appendix B of the Intermediate Design Report for the OSD soil remedy, GE proposed replacing the storm sewer that extends from catch basin CB-1 near the Snack Corner Mobil gasoline station, along Cottage Street, and across Elm Street to the Elm Street Area. The existing storm sewer in this area is not functioning properly, and, as a result, the Town installed an overflow in catch basin CB-1 to divert flow into the storm sewer that flows east along Elm Street. While GE proposes to leave that overflow structure in place, the replacement storm sewer should result in that overflow being used much less frequently, if at all. This is a benefit to the Town and is not a requirement of the ROD.

Based on the Town's comment, the intent of which was explicitly confirmed with Tom Roy of Aries Engineering (the Town's consultant) on November 15, 2007, and EPA's requirement to submit the Final Design Report for the OSD soil remedy by December 31, 2007, ARCADIS BBL has continued to complete the design of the replacement storm sewer, including specifying the various materials of construction. The Town's standard specification package was used to guide this effort. However, pursuant to its Consent Decree with EPA, the Town should provide all of the necessary materials, except for the bedding and backfill, to install the replacement storm sewer from catch basin CB-1 to the outfall at the Souhegan River.

* * * * *

Town Comment 20 - Section 10 - Future Activities and Schedule: *Page 134 paragraph 1 indicated GE was awaiting the Town's discharge requirements for the Town's Publicly Owned Treatment Works (POTW), realignment of Mill Street, alternate access to Keyes Field, and alternate access to certain residential properties.*

Comment: The Town has provided GE with responses to each of these items and is unsure of what additional response GE requests. Specifically, the Town has made POTW operators accessible to GE/ARCADIS/BBL to provide them with POTW discharge requirements, has communicated with Permattach property owners for alternate site access and has received encouraging responses regarding the property owner's willingness to provide alternate Keyes Field access during the remedy. The Town is willing to assist GE with their obtaining the access they require for other residential properties. It is the Town's understanding that it has provided appropriate responses on these matters. The Town is prepared to further assist GE/ARCADIS/BBL with these remedy-related matters to support remedial action.

Response: The Intermediate Design Reports provided two potential discharge locations for the temporary water treatment system: the publicly owned treatment works (POTW) via the sanitary sewer, and the Souhegan River via the on-site drainage ditch/culvert system. In its November 1, 2007 letter, EPA requested that GE specify a single discharge location in the Final Design Report. GE has decided to design the temporary water treatment system for discharge to drainage ditch at the Mill Street Area that ultimately leads to the Souhegan River via the on-site drainage ditch/culvert system. As a result, no further information is required from the Town regarding the capacity of the sanitary sewer line, the discharge limitations or the monitoring requirements for the POTW.

Regarding realignment of Mill Street, on behalf of the Town, Tom Roy provided comments in a July 20, 2007 electronic mail on the proposed realignment presented in the Intermediate Design Reports. As indicated in GE's October 17, 2007 electronic mail response, the Town's comments are factored into the Final Design Report for the OSD soil remedy.

With respect to alternate access to Keyes Field, see the response to Town Comment 5.

"LTTD DESIGN, VOLUME II"

Since the LTTD and OSD designs are similar in several areas, selected common LTTD Design, Volume II comments are presented in the OSD Design, Volume II section.

"Appendix B - Technical Drawings"

Town Comment 1: *Figure G-4 depicts Keyes Drive as closed.*

Comment: The figure notes should refer to an alternate site access for Town residents to use Keyes Field and to allow alternate access for public health, safety and welfare purposes.

Response: See the response to Town Comment 5 on Volume I of the Intermediate Design Report for the LTTD soil remedy.

* * * * *

Town Comment 2: *Figure G-5 depicts the limits of work to include the parking overflow area to the south of the ball field.*

Comment: As previously commented upon, the work area available to the remedial action contractor would include the area along the retaining wall to the south of the gravel road. The access road, gravel road and field must be available to Town residents for overflow parking.

Response: See the responses to Town Comments 1 and 6 on Volume I of the Intermediate Design Report for the LTTD soil remedy. Also see the response to the EPA's comment on Technical Drawing G-5, submitted separately.

* * * * *

Town Comment 3: *Figure G-9 depicts a treated soil staging area on Keyes Field.*

Comment: As previously indicated, treated soil may not be stored on Keyes Field. Only clean materials may be stored on Keyes Field.

Response: See the responses to Town Comments 1 and 6 on Volume I of the Intermediate Design Report for the LTTD soil remedy.

* * * * *

Town Comment 4: *Figure G-4 depicts Keyes Drive as closed.*

Comment: The figure does not appear to depict the asphalt parking areas required on the northwest portion of the site.

Response: Technical Drawing G-4 does not show the referenced parking areas because this drawing presents site preparation activities, not site restoration details. The parking spaces are appropriately shown on Technical Drawing G-20.

Also, the addition of parking spaces along Keyes Drive is not a requirement of the UAO issued to GE. Rather, GE incorporated those parking spaces into the Intermediate Design Reports on a voluntary basis based on the Town's proposed plan for the Elm Street Area.

* * * * *

Town Comment 5: *Figure G-19 depicts the realignment of Mill Street.*

Comment: The final realignment and specifications for the realignment must be consistent with Town road specifications, which are available at the Public Works department.

Response: See the response to Town Comment 20 on Volume I of the Intermediate Design Report for the LTTD soil remedy.

With respect to the specifications for the Mill Street realignment, GE is in receipt of the Town's standard specification package. Applicable portions of the Town's specifications were added to the Final Design Report for the OSD soil remedy.

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Town Comment 6: *Figure G-23 depicts temporary access to residents south of Mill Street.*

Comment: The public relations to provide alternate access for Mill Street residents should be closely coordinated with Town representatives.

Response: As the Town is probably aware, GE previously negotiated access agreements with numerous property owners for the pre-design and design phases of the project. GE has already initiated discussions with many of these property owners for access for the construction and post-construction phases. This includes discussions with the owners of the properties on the south side of Mill Street. GE will continue to provide brief updates regarding the acquisition of access for the construction and post-construction phases of the project in the Monthly Progress Reports submitted to EPA pursuant to the UAO.

* * * * *

Town Comment 7: *Figure G-26, detail 3 the subsurface drain detail for Elm Street Area.*

Comment: The figure should include details to prevent piping and subsequent erosion in the area of the gravel/crushed stone.

Response: A note was provided on Details 3 and 4 of Technical Drawing G-26 that indicated that the pipe would be surrounded by a layer of dry bentonite with a minimum thickness of 0.5 inch. However, to the extent possible, the diagrams associated with Details 3 and 4 will be revised to show the bentonite layer.

"Appendix D - LTTD Staging Scenario"

Town Comment 1: *Figure D-1 depicts locations for field office trailers and clean material storage.*

Comment: As previously indicated, the gravel road and grassed area south of the ball field must be available for Town residents to use as overflow parking for certain events.

Response: See the responses to Town Comments 1 and 6 on Volume I of the Intermediate Design Report for the LTTD soil remedy.

"Appendix E - Truck Route and Traffic Analysis Report"

Town Comment 1: *The Truck Route and Traffic Analysis Report included a Vanasse Hangen Brustlin, INC. (VHB) May 10, 2006 preliminary report in Appendix A upon which most of the truck and traffic analysis appears to have been based.*

Comment: The VHB May 10, 2006 report did not appear to have considered the Town's May 15, 2007 comments on the 30% design Truck Route and Traffic Analysis report. A copy of the Towns' comments is attached to this correspondence to use in revising the Truck Route and Traffic Analysis report.

Response: See the response to Town Comment 7 on Volume I of the Intermediate Design Report for the LTTD soil remedy.

"OSD DESIGN, VOLUME I"

There are many OSD design elements similar to the LTTD design. Those LTTD design comments relevant to similar OSD design elements are generally not repeated in this section.

Following are additional OSD design comments.

Town Comment 1- Section 3.5.1 - Exclusion Zones: *Page 47 paragraph 2 indicated that the exclusion zone (EZ) was depicted on Technical Drawing G-4 and would include the working limits. Technical Figure G- 4 clarified that the working limits on the northern lane of Elm Street was subject to inclusion in the EZ only when necessary to conduct limited excavation with minimum traffic interruptions.*

Comment: The Town expects that the EZ will generally not extend into the northern lane of Elm Street except during those limited times when soil in the northern lane will be removed. At all other times, the EZ will be limited to the Elm Street Area not including Elm Street.

Response: The Town's interpretation is correct.

* * * * *

Town Comment 2 - Section 4.2 - Installation if Engineering Controls: *As in the LTTD design report, this section indicated that the remedial action will not fully address soil PCB concentrations in excess of the SCL.*

Comment: The 60% design should indicate those areas where remedial goals will not be met, and the reasons indicating why the remaining PCB-containing soils will not pose an unacceptable risk.

Response: See the response to Town Comment 8 on Volume I of the Intermediate Design Report for the LTTD soil remedy.

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Town Comment 3 - Section 4.7 - Performance/Sequencing of the Remedial Action: *The last paragraph of this section referred to Scenario 1 where Elm Street Area work would be followed by Mill Street Area work. Scenario 2 would involve simultaneous work at Elm Street and Mill Street and would not require closing Mill Street and the westbound lane of Elm Street at the same time. Page 47 paragraph 2 indicated that the exclusion zone (EZ) was depicted on Technical Drawing G-4 and would include the working limits. Technical Figure G-4 clarified that the working limits on the northern lane of Elm Street was subject to inclusion in the EZ only when necessary to conduct limited excavation with minimum traffic interruptions.*

Comment: The Town prefers to complete the remedial work as expeditiously as is practical, while limiting disruptions to the community, and not simultaneously closing Mill Street and the westbound lane of Elm Street. As such, the Town prefers carefully conducting Scenario 2, where the work is sequenced such that Elm Street and Mill Street are not simultaneously closed, with an emphasis on limiting the remedy's intrusive impact on the Town welfare and traffic.

Response: GE also prefers to complete the soil remedy as quickly as practical, and this is an important advantage of the OSD soil remedy over the LTTD soil remedy.

The bullet on the top of page 73 of the Intermediate Design Report for the OSD soil remedy clearly stated that Mill Street would not be closed at the same time the west-bound lane of Elm Street is closed. Nevertheless, Section 4.7.3 of the Final Design Report for the OSD soil remedy has been clarified to indicate that the excavations within the west-bound lane of Elm Street will be performed prior to initiating excavation activities at the Mill Street Area.

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Town Comment 4 - Section 4.7.5 - Temporary Staging/Material Handling Areas: *This section indicated that saturated materials will require conditioning/dewatering prior to off-site transportation.*

Comment: The dewatering/ conditioning process should be specified to indicate how odors would be controlled, and precautions would be taken to assure that liquids do not leak from loaded trucks.

Response: Dewatering is expected to avoid, to the extent practicable, the excavation of saturated soils. Nevertheless, it is unreasonable to expect the complete dewatering of all soils prior to excavation. For that reason, the remedial design incorporates provisions to perform post-excavation dewatering.

As indicated in the response to Town Comment 16 on Volume I of the Intermediate Design Report for the LTTD soil remedy, it is assumed that excavated saturated soils will be gravity dewatered (i.e., prior to loading into trucks) or conditioned with drying agents, dewatered soils, or drier soils excavated from above the water table. The Remedial Action Contractor shall control nuisance odors using appropriate odor controls (e.g., tarps, odor suppressants, foam spray, etc.). If odors continue during excavation activities, the Remedial Action Contractor will be required to stop work, and prepare and submit for review an Odor Control Plan indicating all additional actions that the Remedial Action Contractor will implement to control odors.

With respect to the potential for liquids to leak from loaded trucks, refer to the response to Town Comment 16 on Volume I of the Intermediate Design Report for the LTTD soil remedy.

"OSD DESIGN, VOLUME II"

"Appendix A Verification Sampling Plan"

Town Comment 1: *Section 1.1, paragraph 3 indicated that the Verification Sampling Plan objective was to conduct confirmation sampling to demonstrate compliance with SCLs.*

Comment: It is not clear in the Verification Sampling Plan that soil samples would be generally collected in the excavations to demonstrate achieving SCLs. Some areas of the Verification Sampling Plan include verification by topographic survey means, other areas include excavation zone verification by 1-foot overexcavation of soil, and still other areas include no soil verification testing in soil zones extending down to the seasonal low groundwater table. In light of site soil heterogeneities, variable waste discharge techniques and times, uncertain contaminant propagation through the subsurface, and because of the lack of soil data in site areas down to the seasonal low groundwater table, the Verification Plan should be revised to demonstrate with statistically significant confidence that the will site comply with SCLs. The Verification Sampling Plan should include such an analysis and if it cannot be demonstrated with a statistically significant confidence that SCLs will be achieved, the Verification Sampling Plan should include collecting additional site confirmation data to demonstrate compliance with SCLs to the seasonal low groundwater table at the Elm Street Area.

Response: The third paragraph of Section 1.1 of the VSP states:

> "The remainder of this section provides background information related to discussions between the General Electric Company (GE) and the EPA regarding the need for confirmation sampling activities at the Site to demonstrate compliance with the SCLs. This section also provides an overview of the types of confirmation sampling proposed for miscellaneous activities at the Site. Finally, this section provides an overview of the format of this VSP. Additional details regarding the scope and performance of the confirmation sampling activities are presented in subsequent sections of this VSP."

This paragraph does not present the objective(s) of the VSP, but instead indicates that the remainder of Section 1 of the VSP provides background information related to discussions of the need for confirmation sampling activities at the Site. Contrary to the suggestions in the Town's comment, there are multiple objectives of the VSP, as evidenced by the fact that there is an entire section of the VSP (i.e., Section 3) that deals with non-SCL verification sampling activities.

The VSP provides a detailed description and numerous supporting figures identifying the specific locations from which confirmation soil samples would be collected from excavation sidewalls and excavation bottoms. Further, the VSP explicitly identifies those areas of the excavation that are not subject to verification sampling due to: achievement of the maximum depth of excavation depth (i.e., bedrock at the Mill Street Area and the seasonal low water table at the Elm Street Area); physical limitations/boundary conditions (e.g., the cemetery, the southern [i.e., east-bound] lane of Elm Street, the Souhegan River, and the northern rail line at the Mill Street Area); at least 2 feet of over-excavation is required to install the engineered cover system (which is 40 inches thick) or establish the required utility corridors, and also the tree planting corridors desired by the Town.

Regarding the remainder of the Town's comment, see the response to Town Comment 3 on Volume I of the Intermediate 60% LTTD Design Report.

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Town Comment 2: *Figures A-3 and A-4 depicted excavation cells and sidewalls not subject to confirmation sampling.*

Comment: The area not subject to confirmation soil sampling is substantial and appears to extend over a quarter or more of each site area. As indicated in the previous comment, the Verification Sampling Plan should indicate how the design will demonstrate to a high statistical probability that SCLs are met at site depths extending to the seasonal low groundwater tabled elevation.

Response: See the responses to Town Comment 3 on Volume I of the Intermediate Design Report for the LTTD soil remedy and Town Comment 1 on Appendix A of the Intermediate Design Report for the OSD soil remedy.

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Town Comment 3: *Figure A-6 depicted Elm Street Areas subject to confirmation sampling.*

Comment: The Verification Sampling Plan should indicate how it will demonstrate to a high statistical probability that site SCLs will be met to depths extending to the seasonal low groundwater table elevation.

Response: See the response to Town Comment 3 on Volume I of the Intermediate Design Report for the LTTD soil remedy.

"Appendix B Technical Drawings"

Town Comment 1: *Technical Drawing G-4 indicated a gate would be located at Keyes Drive.*

Comment: As previously commented upon by the Town, Keyes Field will require an alternate access point to allow the Town to continue to use Keyes Field during the remedy, and to provide an alternate access to the Keyes Field area as a public health, safety and welfare concern.

Response: See the response to Town Comment 1 on Volume I of the Intermediate Design Report of the LTTD soil remedy.

* * * * *

Town Comment 2: *Technical Drawing G-5 generally depicts those areas of Keyes Field that will be used for clean materials storage and trailer locations.*

Comment: Since the Town intends to use Keyes Field during the remedy, the Town will need access along Keyes Drive to the gravel road south of the ball field. The Town will also use the area between the gravel drive and the ball field as an overflow parking area for certain events. While the Town uses Keyes Drive, the gravel road, and the field between the gravel road and the ball park for Town Events, the remedial contractor will have to coordinate its remedial work within the "approximate limits of work" to accommodate the Town.

Response: See the response to Town Comments 1 and 6 on Volume I of the Intermediate Design Report of the LTTD soil remedy.

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Town Comment 3: *Technical Drawing G-29 detail 3 depicts pipe outlet details.*

Comment: The outlet pipe detail should be checked at the intersection of the gravel/crushed stone, riprap, low permeability soil area. It appears that there is a sand section located between the gravel/crushed stone and low-permeable soil interface. The section should also depict construction details to prevent "piping" around the pipe outlet that could lead to cap erosion in this area.

Response: See the response to Town Comment 7 on Appendix B in the Intermediate Design Report for the LTTD soil remedy.

"Appendix C Technical Specifications"

Town Comment 1: *MP-02201-3, Part 2-Products, 3.02 Removal of Water, A. 4 indicated that water will be collected and treated at the temporary water treatment system prior to discharge.*

Comment: The 60 % design indicated that the temporary water treatment system would generally not be able to treat contaminated water from the Elm Street Area. The specifications should indicate that only water capable of being treated by the temporary treatment system will be collected and treated by the temporary water treatment system.

Response: See the response to Town Comment 13 on Volume I of the Intermediate Design Report for the LTTD soil remedy.

The Intermediate Design Report does not state or otherwise indicate that the temporary water treatment system would not be able to treat contaminated water from the Elm Street Area. To the contrary, since the groundwater quality at the Elm Street Area is similar to that at the Mill Street Area, the temporary water treatment system will be able to treat water from the Elm Street Area.

In addition, Section 4.5 of the Intermediate Design Report states that, since the maximum depth of excavation at the Elm Street Area corresponds to the seasonal low water table, only a minimal amount of dewatering would be required to implement the remedial action at the Elm Street Area. For those soils excavated in the vicinity of the water table, it is anticipated that these soils, if saturated, will be made suitable for off-site transport through mixing with overlying drier soils. Nevertheless, Section 4.5 of the Intermediate Design Report states that limited dewatering activities may be appropriate for certain excavations at the Elm Street Area. As a result, Technical Drawing G-7 includes the staging of up to two 18,100-gallon tanks for the potential storage of dewatering and decontamination liquids generated during the implementation of the soil remedy at the Elm Street Area. (That figure also shows a third, 10,000-gallon tank that will be staged at the Elm Street Area for temporary storage of personnel and equipment decontamination liquids.) Those liquids would be pumped or transported from the Elm Street Area to the temporary water treatment system at the Mill Street Area for treatment and subsequent discharge to the Souhegan River via the on-site drainage ditch/culvert system.

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Town Comment 2: *MP-02201-07, Compaction and Density Control specifies earthwork moisture and density control.*

Comment: The moisture and density control, and measures to repair damage to pipes, structures, property or persons will also have to be compliant with Town requirements. Such compaction, moisture and required repair measures may be obtained from the Town Public Works Department.

Response: GE has reviewed the applicable portions of the Town's standard specification package. The Town's specifications for compaction, moisture, and density control are all acceptable.

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Town Comment 3: *MP-02201-08, 3.07 Other Requirements, Dust Control indicated dust control would be in accordance with the Community Air Monitoring Plan.*

Comment: The Community Air Monitoring Plan was apparently not included with the 60 % design. The Community Air Monitoring Plan should be submitted for further evaluation and comment.

Response: As required by the UAO and as indicated in Section 1.6 of the Intermediate Design Report, the forthcoming RAWP will include details for certain components of the soil remedy, including perimeter air monitoring activities.

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Town Comment 4: *MP-02203-2, 3.01 Placement, indicated compaction for driveways, sidewalks and parking lots.*

Comment: These requirements should be compared with relevant Town compaction specifications available at the Public Works Director's office.

Response: See the response to Town Comment 2 on Appendix C of the Intermediate Design Report for the OSD soil remedy.

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Town Comment 5: *MP-02210-2, 2.01 Materials, indicated fertilizer application rates.*

Comment: Fertilizer application will have to be compatible with NHDES requirements for areas within 50 feet of protected public water such as the Souhegan River.

Response: Fertilization will not be used during the implementation of the soil remedy, and the referenced Technical Specification has been modified accordingly.

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Town Comment 6: *MP-13605-2, 3.02 Collection of Liquids, indicated all liquids would be transferred to the temporary water treatment plant.*

Comment: In light of the temporary water treatment plants inability to treat certain contaminants such as VOCs and metals observed at Elm Street Area water, alternate arrangements would have to be made to manage liquids incompatible with the temporary water treatment plant.

Response: See the response to Town Comment 1 on Appendix C of the Intermediate Design Report for the OSD soil remedy.

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Town Comment 7: *Haley & Aldrich, 02160-6, 3.06, Removal of Support System indicated all support systems 5 feet or more below the ground surface would be removed if practical.*

Comment: As the Town indicated in our 30% design comments, the Town wants all subsurface support systems removed from Town property.

Response: This Technical Specification was revised for the Final Design Report for the OSD soil remedy. However, the revised specification will not require that all structural supports be removed from the Site, as discussed further below.

As discussed previously, the soldier pile tremie concrete (SPTC) wall at the Mill Street will not be removed. The upper 5 feet of the SPTC wall below final grade will be removed. That partial removal is expected to only involve steel soldier piles and wood lagging, not the concrete portion of the SPTC wall.

The only other structural support that GE proposes to leave in place is the steel sheeting along the base of the riverbank at the Elm Street Area. This sheeting will be cut off such that it terminates within the riprap that will armor the riverbank, and therefore would not be visible. Details regarding this modification are provided in the Final Design Report for the OSD soil remedy. However, based on EPA's November 1, 2007 comments, the remedial design was modified to include the installation of steel sheeting at the location of the "low water" mark shown for the Souhegan River on the Technical Drawings, and extending along the entire riverbank where any excavation is required adjacent to the river. The steel sheeting left in place along the Souhegan River will have the added benefit of serving as a demarcation boundary for any future remedial action to address impacted sediment in the river.

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Town Comment 8: *Figure D-1 indicated an alternate field trailer location and potential clean materials staging location.*

Comment: As previously indicated, the Town will only allow clean materials in Keyes Field staging area. This figure seems incompatible with prior staging figures. The Town prefers the trailers be located as depicted in the upper portion of Figure D-5, that the alternate field trailer location not be used, and that the potential clean material storage area be used but only to the extent that it does not involve clearing the depicted woods on the figure.

Response: See the responses to Town Comments 1 and 6 on Volume I of the Intermediate Design Report for the LTTD soil remedy.

This comment does not relate to Appendix C of the Intermediate Design report for the OSD soil remedy. Rather, it relates to Appendix D.

GE assumes the Town's comment was intended to reference Technical Drawing G-5, rather than Figure D-5. Figure D-5 shows the Mill Street Area.

Technical Drawing G-5 specifies the same trailer, alternate trailer, and equipment/materials staging locations as those illustrated on Figure D-1.

With respect to the Town's comments regarding the use of the area in Keyes Field between the retaining wall and the gravel road, the exact configuration and size of this area will largely be determined by the Remedial Action Contractor. GE's intent in portraying these areas was to specify the area deemed sufficient to perform the soil remedy. As shown in Figure D-1 and Technical Drawing G-5, the clearing of some trees is possible,

notably for the designated location of the clean backfill, equipment staging, and materials staging. Access to this area, and also the alternate trailer location, is intended to be from the east, which also requires some clearing of existing trees, as shown on Technical Drawing G-5. This approach was selected to avoid the use of additional areas in Keyes Field, including the gravel road and the area between the gravel road and the baseball field, consistent with other comments provided by the Town. Finally, it is important to note that the LTTD soil remedy would consume additional space within Keyes Field, including all of the area shown for the OSD soil remedy and also the gravel drive and the area between the gravel drive and the baseball field. The LTTD soil remedy also involves the clearing of trees, in fact, even more trees than would be cleared for the OSD soil remedy. Refer to Technical Drawings G-5 and G-9 in Appendix B and Figures D-1 and D-2 in Appendix D of the Intermediate Design Report for the LTTD soil remedy.

"Appendix A Truck Route and Traffic Analysis Preliminary Report"

Town Comment 1: *The preliminary report appears similar to a prior report commented on by the Town in May 2007.*

Comment: The preliminary report did not appear to address the Town's prior traffic analysis comments. For example, the preliminary report depicted truck traffic passing through the oval, and Elm Street and Mill Street closed at the same time. The Town's May 2007 comments indicated that these conditions constituted unacceptable truck routing. As previously indicated in these comments, the Truck Route and Traffic Analysis report should be revised to reflect the Town's attached May 2007 comments.

Response: See the response to Town Comment 7 on Volume I of the Intermediate Design Report for the LTTD soil remedy.

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"Institutional Controls and Access Restrictions Plan"

Town Comment 1: *Section 7.1 - Access and Access Restrictions During Construction Phase 1. This section requires GE to use best efforts to obtain access and access restrictions.*

Comment: As previously indicated in these comments, GE should commit to an alternate access through the Permattach site. The Town will assist GE in obtaining such access.

Response: See the responses to Town Comment 5 on Volume I of the Intermediate Design Report of the LTTD soil remedy.

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Town Comment 2: *Section 7.2 - Access and Institutional Controls During the Post-Construction Phase 1. Page 33 bullet 2 requires the Town to complete easements and restrictive covenants within 30 days after the EPA approves the final design.*

Comment: The Town intends to complete such easements and restrictive covenants as required by the consent decree.

Response: Section 7.2 of the IC/AR Plan states:

> "For the four properties (i.e., Parcels 25-12, 25-13, 12-133 and 25-111) owned by the Town that require institutional controls for land use and access to surface and/or subsurface soils, GE proposes that EPA request that the Town complete the Environmental Protection Easement and Declaration of Restrictive Covenants provided as Appendix B of the Consent Decree between EPA and the Town (see Appendix A) for each property and submit the completed documents to EPA within 30 days after EPA's approval or approval with modifications of the Final (100%) Design Report (Final Design Report). This should allow sufficient time for EPA review and approval of the completed documents, and for the Town to execute and record the final Environmental Protection Easement and Declaration of Restrictive Covenants for each of the four properties with the Hillsborough County Registry of Deeds before EPA approval or approval with modifications of the RA Work Plan."

This is consistent with the language of Section VIII.17.C of the Town's Consent Decree that requires the Town to execute such easements upon request by EPA.

Section VIII.16.A of the Town's Consent Decree indicates that within 15 days after entry of the Town's Consent Decree, or within 15 days of the Town acquiring ownership of any properties within the Site boundaries, the Town was required to submit notices to the Recorder's Office, Hillsborough County, State of New Hampshire providing notice to all successors-in-title that the property is part of the Site, that EPA has selected a remedy for the Site and that the Town entered into a Consent Decree affecting the property.

"General Comments"

The Town is aware that GE and the Environmental Protection Agency (EPA) have exchanged correspondence relevant to this 60% design commenting on remedial elements that affect the site design. Rather than provided individual responses to each letter between GE and the EPA, the Town focused our comments on the submitted 60% design while at the same time attempting to address relevant matters documented in correspondence exchanged between GE and EPA. To emphasize selected remedial criteria important to the Town, the Town prepared these additional general 60% design comments.

Town Comment 1: *The Town wishes to continue to discuss completing the retaining wall between the Elm Street Area and the abutting cemetery using local, large stones. The Town Cap Committee has indicated that GE's proposed riprap wall is not acceptable due to esthetic and safety concerns. The Town prefers that GE complete the retaining wall using Milford native stone available in local quarries. The Town has provided GE with potential stone suppliers whom the Town understands is willing and able to provide native stone to GE for this work.*

Response: See the response to Town Comment 9 provided in GE's May 18, 2007 letter to EPA. As indicated in that response, GE may be willing to consider placing such large granite blocks at the Site if the Town provides the materials.

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Town Comment 2: *The Town will not require additional design details to support riverine species planting along the riprapped riverbank face.*

Response: No response required.

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Town Comment 3: *The Town will require that subsurface structures used to support excavation sidewalls be removed. If it is not possible to remove the subsurface structures, the Town will require that the structures be removed to a depth of at least 5 feet and that the remaining structures not impede potential future construction in those areas or adversely interfere with the flow of groundwater thorough those zones.*

Response: See the response to Town Comment 7 on Appendix C of the Intermediate Design Report for the OSD soil remedy.

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Town Comment 4: *Alternate Town access to Keyes Field will be required during remedial action. The Town is prepared to continue to assist GE in obtaining such alternate access. Towards this end, on August 1, 2007 the Town received correspondence from the Mayo Group representing the Permattach property owners, indicating their willingness to formalize an agreement for such access. The Town's attorney will contact the Mayo Group's legal representative to further pursue access. We will keep GE apprised of the Town's efforts in this regard.*

Response: See the response to Town Comment 5 on Volume I of the Intermediate Design Report for the LTTD soil remedy.

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Town Comment 5: *We understand that New Hampshire landfill closure rules are considered minimum standards that may need to be revised based on the site location, variations in climate and soil (for example Pittsburg area requirements versus seacoast area requirements), and site-specific variables such as waste type, site geology, and site hydrology. As such, the Town expects that the site closure design, which we understand is consistent with DES minimum closure rules, will be prepared by GE's engineer to provide the best long-term closure life span, low maintenance, and protection for this site. We understand that such an engineering assessment of the suitability, reliability and effectiveness of the site cap system will be submitted in the next design submittal.*

Response: On May 30, 2007, Sherilyn Burnett Young of Rath, Young, & Pignatelli, outside counsel for GE, submitted a letter to EPA that provided a response to EPA Comment 2 in its February 27, 2007 letter regarding the Elm Street Area cover system and utility corridors. Ms. Young's letter provided a description of the minimum requirements for the construction of impermeable and low-permeability capping systems in the State of New Hampshire. As indicated therein, the soil cover proposed in the Intermediate Design Reports for installation at the Elm Street Area meets or exceeds those minimum construction requirements and is also more protective than several landfill caps recently approved by the New Hampshire Department of Environmental Services (NHDES) for sites located near Milford. Therefore, it was concluded that the soil cover proposed for the Elm Street Area was consistent with NHDES regulations.