REPORT

Draft for EPA Review

Pre-Design Report
Volume II of III

General Electric Company

Fletcher's Paint Works and Storage
Facility Superfund Site Operable Unit 1
Milford, New Hampshire

January 2005
Revised April 2009

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Appendix A

Regulatory Correspondence

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EPA Letter to GE Regarding Potential Site Remedy Change dated July 16, 2001

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

OFFICE OF THE
REGIONAL ADMINISTRATOR

July 16, 2001

Mr. Stephen Ramsey, Vice President
Corporate Environmental Programs
General Electric Company
3135 Easton Turnpike
Fairfield, CT 06431

Re: Fletcher's Paint Works and Storage Facility Superfund Site
Milford, New Hampshire

Dear ~~Mr. Ramsey:~~ Steve

This letter is in response to your telephone call asking if, at this time, it would be worthwhile for GE to submit a new proposal to EPA regarding cleanup of the Fletcher's Paint Superfund Site. As I understand it from your oral proposal, GE would negotiate a Consent Decree with EPA to perform cleanup in accordance with the Record of Decision (ROD) issued in September 1998, with the major exception that the remedial action would utilize off-site disposal of contaminated soils, rather than the treatment remedy required in the ROD. You also asked that EPA agree to give GE orphan share funding for past costs.

During public comment on the ROD and in submissions made by GE after issuance of Special Notice, GE did not propose the remedy alternative you have just suggested. Moreover, after meeting with the Region on March 29, 2001, we understood that GE's March 30, 2001 proposal, and the addendum submitted on April 6, 2001, would represent its best and final offer to perform response actions at the Site. That offer did not include this proposal. Still, even at this late stage, the Region has carefully considered this request, in consultation with our Headquarters offices and with the State of New Hampshire.

As you are probably aware, the Region issued a Unilateral Administrative Order (UAO) for Remedial Design and Remedial Action (RD/RA) to GE earlier today. Under the UAO, GE is ordered to perform RD/RA required under the 1998 ROD, one component of which is the treatment of contaminated soils by thermal desorption. Any change from this component to off-site disposal of untreated soils would constitute a change in the remedy which could only be effected in accordance with the statute and the National Contingency Plan ("NCP"). In 1998, EPA selected a treatment remedy, in accordance with the statute and NCP, which is appropriate for addressing the imminent and substantial endangerment caused by contamination at the Site.

With this in mind, the Region is willing to enter into settlement discussions with GE and to consider the possibility of changing the remedy to allow off-site disposal of contaminated soils. However, there are a number of issues which are of paramount concern to EPA and must inform any settlement discussions. In particular, it is important to obtain agreement on the following items:

- GE will fully comply with the UAO, CERCLA Docket # 01-2001-0063, regardless of whether the remedy is revised.
- GE may perform design work on a dual track: design of the remedy in the ROD, and a conceptual design for off-site disposal. Any such conceptual design must include an analysis of the proposed change in light of the NCP nine criteria; a discussion of infrastructure improvements necessitated by increased truck traffic; steps GE will take to assist EPA in communicating to the public the rationale for any proposed changes to the remedy in order to obtain community and State acceptance; and an expedited schedule demonstrating that the alternative cleanup approach could be implemented within the same general timeframe required for the ROD remedy under the UAO, including the time necessary for any new public process, as determined by EPA, and for EPA decision-making.
- The State, the Town and the community will be given the opportunity to comment on the conceptual design plan for proposed off-site disposal.
- EPA will not change this component of the remedy unless the change is acceptable to the State, Town and community, and otherwise supportable when analyzed in light of the requirements of the NCP. Whether to make the change or not is entirely in EPA's discretion.
- GE is seeking solely a change to the treatment component of the remedy.
- GE will not challenge any other aspects of the remedy during any public comment process, and will waive its rights to assert in any proceeding that any revision to the remedy is inconsistent with CERCLA and the NCP.

If these other items are agreed upon, the Region will work with GE to obtain orphan share funding for EPA's past costs. If GE wants to pursue settlement talks, continued discussion should take place through the EPA/DOJ case team. I believe that successful resolution of the issues outlined above is possible and desirable. Upon entry of any Consent Decree negotiated between the parties, the UAO will be withdrawn.

Sincerely,

Patricia L. Meaney

Patricia L. Meaney
Acting Deputy Regional Administrator

Mr. Stephen Ramsey
July 16, 2001

cc: Richard Cavagnero, EPA Acting OSRR Division Director
Barry Breen, EPA/OECA
Steve Luftig, EPA/OSWER
Cheryl Sprague, EPA
Dick Boynton, EPA
Antoinette Powell, EPA
Marcia Lamel, EPA
Joanna Jerison, EPA
Mark Gallagher, DOJ
Bonnie Harrington, GE
Coke Cherney, Ropes & Gray
Phillip O'Brien, NH DES
Thomas Andrews, NH DES
Michael Walls, NH Attorney General's Office
Lee Mayhew, Town of Milford

Draft for EPA Review

NHDHHS Letter Confirming Modification of SCL for Arsenic to 11 ppm dated July 22, 2002

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STATE OF NEW HAMPSHIRE
DEPARTMENT OF HEALTH AND HUMAN SERVICES
OFFICE OF COMMUNITY & PUBLIC HEALTH
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603-271-4664 1-800-852-3345, Ext. 4664 TDD Access: 1-800-735-2964

Donald L. Shumway
Commissioner

Kathleen A. Dunn
Director

July 22, 2002

Cheryl L. Sprague, Remedial Project Manager
Office of Site Remediation and Restoration
US Environmental Protection Agency, Region 1
1 Congress Street, Suite 1100
Boston, MA 02114 2023

Dear Cheryl:

The Office of Community and Public Health, Bureau of Health Risk Assessment (BHRA) has received your letter dated June 4, 2002 regarding the use of the 11 mg/kg concentration for arsenic as a cleanup level in surface soils at the Fletcher's Paint site.

During the development of the NH Department of Environmental Services' (DES) Risk Characterization and Management Policy (RCMP), BHRA was charged with developing conservative direct contact risk based values that were intended to be used in look-up tables for streamlined risk assessments (Method 1). However, due to arsenic being ubiquitous and in various concentrations throughout the state, DES also had to consider the background concentration of arsenic in establishing the soil standard. Through several surveys, DES determined the 95th percentile background value of arsenic in the state to be 11 mg/kg. Considering the conservative risk based value (0.8 mg/kg) was below the 95th percentile background level (11 mg/kg), DES made the risk management decision to set the Method 1 arsenic soil standard on the background concentration.

In summary, the cleanup level at the Fletcher's Paint site should be made by risk management considering:

- Was arsenic used in any processes at the facility?
- What is DES policy for similar situations described in your letter?
- What is the background concentration of arsenic in the area of the site?

Please call me at (603) 271-4664 if you have any questions.

Sincerely,

Dennis A. Pinski, M.P.H.
Section Supervisor
Bureau of Health Risk Assessment

CC: David Larson, BHRA
Tom Andrews, DES
Anne H. Kubina, MD, MPH, Administrator, BHRA

Draft for EPA Review

EPA Comments to PD Work Plan and POP dated May 1, 2003

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May 1, 2003

Mr. Lewis Streeter
General Electric Company
320 Great Oaks Office Park
Suite 323
Albany, NY 12203

Re: EPA comments on:
Pre-Design Work Plan
Project Operations Plan
Surface Water and Groundwater Monitoring Plan
Fletcher's Paint Site, Milford, NH

Dear Mr. Streeter:

The U.S. EPA has received and reviewed the Pre-Design Work Plan, Project Operations Plan and Surface Water and Groundwater Monitoring Plan submitted in December 2001 and January 2002 by Blasland, Bouck & Lee, Inc. (BBL) on behalf of the General Electric Company (GE).

Section V.B. 1 in Attachment C (Scope of Work) to the Order required GE to submit a Pre-Design Work Plan to EPA that would specify and describe in detail all tasks and investigations to be undertaken to further identify and quantify the extent of soil and groundwater contamination at the Site required for remediation. In support of the Pre-Design Work Plan a Project Operations Plan was to be prepared in support of all field activities to be conducted including a sampling and analysis plan, a site management plan an d a community relations support plan.

In accordance with Section XIV of the Order, EPA review of submissions, EPA disapproves the submission and directs the Respondent to re-submit the document after incorporating EPA's comments. Upon receipt of a notice of disapproval or a request for a modification, Respondent shall, within twenty-one (21) days or such longer time as specified by EPA in its notice of disapproval or request for modification, correct the deficiencies and resubmit the plan, report, or other item for approval.

Dawn Neville from GE previously requested a duration in excess of the 21 days stated in the Order for resubmission of a report. EPA will determine any extension to the 21 day duration to address these comments and submit the plans at a meeting with GE that shall be held, at the request of Dawn Neville, within fourteen days from receipt of this letter. EPA reserves its right to require future modifications to the Work Plans and/or require additional sampling or response actions necessary to meet the requirements of the Order.

Also in accordance with Section XIV of the Order, EPA review of submissions, notwithstanding the notice of disapproval, or approval with modifications, Respondent shall proceed, at the direction of EPA, to take any action required by any non-deficient portion of the submission. EPA therefore directs GE to begin activities at the site related to the Phase I activities as defined in the Workplan, and as modified by EPA's comments as well as any activity related to the Pre-Design Investigations and action s related to the Institutional Controls and Access Restrictions Plan. In accordance with Section IX, Work to Be Performed, respondents shall initiate field activities 15 days following EPA approval or modification of the Pre-Design Work Plan, or as directed by the EPA.

Enclosed are the EPA comments to the Dec. 2001 Pre-Design Work Plan, including comments to the Project Operations Plan and the January, 2002 Surface Water and Groundwater Monitoring Plan.

Please let me know of your availabilities to meet to discuss these comments. If you have any questions regarding the content of this letter, please call me (617) 918-1244 or John Beling, EPA case attorney at (617) 918- 1712.

Sincerely,

Cheryl L. Sprague
NH/RI Superfund Section
Office of Site Remediation and Restoration

cc: Antoinette Powell, EPA
John Beling, EPA
Scott Acone, ACE
Tom Andrews, NHDES
Mike Jasinski, EPA
Katie Chambers, Milford

EPA Comments to PRI Workplans
Fletcher's Paint Site
Milford, NH
May 1, 2003

General Comments on the Pre-Design Work Plan and Project Operations Plan

1.) To support design, a more detailed discussion of subsurface conditions will be required. GE shall add boring logs, cross sections, and information on site-specific geology, in the Pre-Design Investigation Report to support any conclusions or design considerations derived from these investigations.

2.) Several utility lines may be present on the Keyes Drive, Mill Street and Elm Street areas. GE shall report all readily available information which delineates these utility corridors. The results of the surveys to be performed during these investigations shall include information pertaining to these utilities and shall be presented in the final Pre-Design Investigation Report.

3.) The plan does not appear to adequately address the issue of DNAPL mobility during boring and well installations. GE has submitted numerous reports and memorandums detailing your position with respect to this and therefore, it is unclear why precautionary measures described by GE in earlier submissions have been minimized in this plan. Specifically, there is no description in the appendices for any double casing for boring installations. Appendix E refers only to the use of hollow stem auger drilling methods and push point techniques. Appendix A references driven casing use in conjunction with hollow stem augering, which then references Appendix E for specific procedures. Appendix E does not actually present specific procedures other than to reference the ASTM standard that will be used. In comparison, I have attached pages form a BEAK report submitted on behalf of GE for prior boring /well installations which presents much greater detail and addresses the precautionary measures that are taken in such site conditions. GE should also refer to the EPA RI procedures and where differences of methodologies are presented.

4.) GE indicated that they may be willing to sample sediment from the River in an effort to review the extent of PCB contamination. While this work would be related to operable unit 2, it may prove cost-effective to look at a possible combining of any sediment action and the cleanup of Elm Street under the OU1 remedy. The original RI indicated that there is a risk related to the PCB contamination in the sediments and biota in the river but that this contamination did not appear to extend far from the banks of the site. Any potential river action would need to be proceeded by an EECA or an FS report. This could be accomplished within the time frame of the pre-design/remedial design of OU1 with the chosen cleanup action being tied into the OU1 remedial action. The sediment data would also be helpful, should GE desire to place any sheet piling or other barrier at the extent of contamination in the sediment beyond the river edge. GE should consider this sediment sampling and either include the event as part of this plan, or recommend an alternative means of communicating this effort.

The following comments apply to the Pre-Design Work Plan:

General Comments:

6.) The UAO does not address nor mention the EPA's allowance for the consideration of a design of an off-site disposal option for the contaminated soils. Therefore, GE shall in include in Section 1.2 a sentence that clearly indicates that, separate to the required actions under the UAO, GE may perform additional data collection and analysis during the pre-design investigations to review an option for the off-site disposal of the contaminated soils. These additional studies are not required nor do they appertain to compliance with the UAO, but would occur concurrent with the activities to be conducted for compliance with the UAO for the remedial design and remedial action of the ROD remedy.

7.) A table shall be added which shows a summary of the quantity of field samples and associated quality control samples to be collected for each sampling activity. State the rationale for the selection of the chosen PCB analysis method (congener/Aroclor) (see section 9.2.1 of the POP/QAPP) and selection of filtered or unfiltered water samples (see section 9.2.2 of the POP/QAPP).

8.) A Table shall be added which details the proposed soil and groundwater sampling locations, depths and analyses to be performed.

Specific Comments:

9.) 2.2.1, Elm Street Area - The building demolition was not a removal action, but an interim action for the remedial action. The Elm Street building slab was broken up and disposed off-site at a regulated facility. The granite block foundation was left in place at the end of the 2000/2001 EPA action.

10). 2.2.2, Mill Street Area, page 2-4 - In the summer of 1995 GE did not voluntarily perform the residential cleanup, rather GE was Ordered by the Agency to perform this cleanup action. The asphalt curtain, however, was not included in the Oder, but conducted by GE so as to prevent the re-contamination of the residential properties from site run-off.

11). 2.3 Summary of Data - Table 1 - The numbers/and or units are not correct. Please provide corrected tables, with results shown in the same units in which the cleanup levels are expressed (mg/kg, or ppm). Some values are listed as "0" in this table, however the key indicates that ND should have been used. Please revise to non-detect (ND) and show reporting limit. Also there are no dates for the Mill Street exploratory borings (EB-07 thru EB-21).

12.) 2.3 Summary of Data - /Table 2 - The numbers/and or units are not correct. Please provide corrected tables, with results shown in the same units in which the cleanup levels are expressed

(mg/kg, or ppm). Indicate reporting limits for samples which showed non-detects for analytes.

13.) 3.1, page 3-4 last paragraph - Delete this entire paragraph.

Phase I Investigation Activities

14.) 4.1, page 4-2 - Health & Safety Plan (HASP). It's indicated that GE and BBL will be covered by the HASP submitted. Please clarify that EPA and Corps site visitors will also be covered by same HASP.

15.) 4.3.1, page 4-3 - Clearing and Grubbing. The text states that vegetative material from clearing and grubbing will be chipped and disposed as yard waste. Cleared material may be chipped and disposed of as yard waste, assuming that none of the contaminants of concern on site tend to accumulate in plant matter. Grubbed material (such as roots, which would have a fair amount of probably contaminated soil attached) should be handled as PCB-contaminated material, to be treated on site or disposed off-site with the rest of the PCB-contaminated soil.

16.) 4.3.1, page 4-3 - Clearing and Grubbing. Please indicate the erosion control measures that will occur with the clearing and grubbing actions related to the Elm Street area and specifically along the bank of the river. Such controls will be required to prevent the erosion of these contaminated soils into the adjacent river.

17.) 4.3.2, page 4-3 Debris Removal. Upgrade to reflect current status.

18.) 4.3.4, page 4-4 Site Security - Fencing should also be deployed around the decontamination pad area and any investigation derived waste (IDW) or other potentially contaminated debris ("to be dismantled and consolidated on-site to await characterization and disposal") left on site for any period of time at the Mill Street Area. Eventually, a fence or other form of significant restriction will be required around the entire site during excavation, so it may be simplest to deploy that fence/restriction from the outset. Upgrade to reflect comments made on ICAR Plan for the use of restrictions for the Mill Street area.

19.) 4.4.1, Baseline Site Information - EPA suggest including provisions for establishing preconstruction baseline characteristics of abutting properties and facilities, to assist with possible claims for damage during construction. These should include installing and monitoring deformation monitoring points on abutting properties and facilities (including the RR tracks), photographing/videotaping the adjacent properties, and monitoring noise and vibrations, as appropriate.

20.) 4.4.1.1, and 4.4.1.2, pages 4-5 and 4-6 - Site Survey & Geophysical Survey. Both surveys should attempt to find former floor drains, piping, former septic systems, and French drains. Given the depth of contamination, it seems possible that PCBs and other contaminants reached these depths via the preferential pathways these features would provide. TF Moran was the sub-contractor that performed the surveys during the remedial investigation.

21.) 4.4.1.2, page 4-7- EM-61 Electromagnetics Survey. Text proposes conducting survey using a spacing of 20 ft between lines, and collecting measurements at 5-ft intervals. Both line spacing and data collection interval are far too coarse. In general, the line spacing should be no greater than half the largest dimension for isolated targets (such as USTs). Recommend a line spacing of 5 ft, instead of 20 ft. The geophysical instrumentation should be configured to acquire digital data using a continuous sample mode, in order to achieve an adequate sample density. A sample interval of 0.1 ft to 2 ft is typical. Recommend that the instrument be set up to record a sample data point every 0.5 ft along each line (0.5 ft sample interval instead of 5 ft).

22.) 4.4.1.2 , page 4-7 - GPR Survey. Once targets have been identified by the EM survey, the GPR survey should focus on those target areas, using an even tighter line spacing (say 2.5 ft) and data sampling interval (say 0.1 to 0.2 ft). Indicate the frequency of the antennae selected for doing this work, and provide the rationale for selection, including depth of penetration and resolution. In general, lower frequency antennae will provide a greater depth of penetration, but have lower resolution than higher frequency antennae. What is the desired depth of GPR investigation?
A higher frequency antenna (shorter signal wavelength) can resolve smaller features than a lower frequency antenna (longer signal wavelength). Generally, a feature that is ¼ to 1/3 the size of the signal wavelength can be resolved by the antenna and GPR electronics. What is the smallest feature the survey is interested in detecting?

23.) 4.4.1.4, page 4-10, Traffic and Road Survey - To estimate traffic volume (in the event other resources prove insufficient), the plan indicated that an automatic traffic device would be employed at Elm Street, Mill Street and at the Keyes Drive for one month. However, the plan does not indicate a representative month. The fluctuation of traffic on each of the streets may vary depending on the season (school in, school out, summer use of Keyes Field, etc.). How will this fluctuation be addressed should this survey be employed?

24.) 4.4.1.4, page 4-11, Traffic and Road Survey - The plan calls for the evaluation of the volume and type of pedestrian traffic. Will the survey include the evaluation of potential alternate routing of pedestrian traffic during the remedial action activities?

25.) 4.4.1.4, page 4-11, Traffic and Road Survey - The plan includes a visual inspection of Elm Street out to Route 101 for any issues related to increased traffic during the remedial action. As a side note related to a review of an off-site disposal option, GE should consider (but not include in this plan) the potential impacts of additional traffic along the roads and routes should a local contractor be utilized to supply the quantity of backfill material needed for such an option.

26.) 4.4.1.5 , page 4-12- Monitoring Well Survey. EPA suggests using a hand-held magnetomer ("line locator") to aid in finding flush-mounted wells (road boxes) and using survey (traditional or GPS) to aid in locating wells. The survey shall evaluate the condition of the measuring point, and if there is any question about whether or not the well pipe has been modified in any fashion, re-survey the measuring point.

27.) 4.4.1.5, page 4-12- Monitoring Well Survey. - In meeting the objective of the monitoring well survey, of evaluating the usefulness of the existing wells, grab samples using bottom-loading bailers will be employed. Historically, well mw-07 has had a flocculent material in it, if allowed to site over a period of several months. If GE intends to sample this flocculent material, a sample would best be pulled during the first bailer grab, as there may not be a significant amount of floc in the well to collect another sample in the actual groundwater sampling event, if it follows too closely.

28.) 4.4.2.1, page 4-13 background concentration for arsenic - The pre-design work plan states a proposed background concentration for arsenic of 11 mg/kg. While it does appear that this may be acceptable as a background concentration for arsenic, EPA requires additional discussion with NHDES and the NH Dept. of Public Health and Bureau of Risk Assessment regarding acceptance of this level and will get back to GE following such discussion. The Work Plan also states that if Phase II surface soil sampling indicates that there are significant areas of the Site with arsenic concentrations greater than 11 mg/kg, then soil sampling and statistical analysis will be performed. GE shall present a time frame for when such a decision will be proposed to the EPA and how the decision may affect the overall schedule for completion of the pre-design investigations within the time frames estimated.

29.) 4.4.2.1, page 4-14 background concentration for PAHs - In our telephone conversation on May 7th, EPA and GE discussed GE's concerns of "chasing" PAHs. It was discussed that, in lieu of the EPA addressing the deficiencies of the proposed baseline PAH soil study, the results of which would be a significant undertaking of a sampling effort of statistical significance, EPA will recognize that GE will not be required to pursue PAHs in the surface soils, that exceed the ROD based cleanup levels, beyond the point where PCB concentrations meet the ROD cleanup level of 1 ppm in surface soils.

30.) 4.4.2.2 , page 4-14 - Groundwater Elevation Monitoring. Precipitation data should be collected either on site, or from the closest monitoring station (**http://lwf.ncdc.noaa.gov/oa/ncdc.html**) to corroborate with groundwater monitoring data. These data may also be helpful in assessing how responsive the groundwater table is to rainfall, and may be helpful in planning and designing the dewatering system for the excavations.

31.) 4.4.2.2 , page 4-15- Groundwater Elevation Monitoring. Add rationale for selecting wells to be included in monitoring well survey activities. For example, it's assumed that the "B" wells are included, but not the "A" wells, at Elm Street because excavation will extend only to the seasonal low water table, and the "B" wells are set in "shallow overburden" (vs. "deep overburden" for the "A" wells). Why is isn't MW-25B and C part of the Mill street activity? It would be helpful to have water level measurements in both sets of wells to help in evaluating vertical gradients on the site, adjacent to the river. The text indicates that water levels would be measured once per month over a 6-month period during the pre-design investigation. Will this 6-month period cover the time of year when expected seasonal low water table conditions would be expected to occur? Please add discussion of when seasonal low water table conditions are expected to occur at this site.

EPA also strongly recommends collecting water level measurements at least weekly. Transducers could be set in wells, with data loggers recording water levels daily, requiring minimal additional effort. Sufficient data must be collected to support water level elevations said to represent "seasonal low water table conditions." EPA also suggests obtaining water level records for "ambient wells" maintained by the USGS, to help support claim that water levels represent seasonal lows.

EPA notes that installation of a new shallow overburden well, adjacent to the EB-15 area), would provide useful groundwater information given that this location is near a zone that seems to have the highest levels of PCB contamination at depth. Water samples from this well could provide a worst-case scenario for treatment of water collected (during dewatering) from this part of the excavation.

While excavation at Elm Street will extend only to the seasonal low water table, there is no guarantee that excavation activities will take place during seasonal low water levels. It is assumed that BBL is collecting necessary data and planning for the probable necessity of doing some dewatering of the excavation at Elm Street.

Phase II Investigation Activities

32.) Section 4.5.1.1, page 4-18 - Elm Street Area. Please add discussion of why the various tests are required and how they will be used. It wouldn't appear that all of these tests would be required for designing excavation shoring/sheeting, but may be of interest to the treatability study and/or the disposal facility (compaction characteristics).

Please clarify if the test for "organic carbon content" is intended to be the chemical analysis for Total Organic Carbon (TOC) or the mechanical analysis for organic content using a furnace to burn off the organic matter (ASTM D 2974). It may be helpful to run the test both ways, as the geotechnical test for organic content tests a much larger sample volume compared to the TOC type of analysis.

It would be helpful to determine the moisture content and specific gravity of the soil (ASTM D 5550) for treatability testing. EPA also suggests doing some testing (ASTM D 1556, etc.) to determine unit weight of soil, for estimating tonnage for treatment/disposal.

See comments to Figure 4 for more EPA comments regarding the phase II soil sampling event. Objectives - While the objective is to be able to determine the extent of the excavation and therefore the total soil volume; this volume is still an estimate for the purposes of the design. Provide the basis for the determination of how, when and where additional surface and subsurface soils samples will be collected beyond the boundaries identified in Figure 4?

What activities will be conducted during the soil boring activities to ensure the stability of the granite walls surrounding and supporting the cemetery?

33.) Section 4.5.1.2, page 4-20 - Mill Street Area. See above comments for the Elm Street area. Also, "TOC" is listed here; again, is this what is intended?

VOCs/SVOCs will be sampled at the location of the highest PID reading according to the methodologies writeup. This sampling was not included as part of analysis in the general writeup, on the prior page. Also please explain why are the Mill Street subsurface soils are being sampled for VOCs/SVOCs but there is no mention of this sampling for the Elm Street soil borings?

Also, text indicates that continuous sampling will be done to the top of bedrock, as determined by auger refusal. This can be misleading in till material that can contain cobbles/boulders large enough to cause early refusal above bedrock. Field crew should be made aware of existing data at nearby borings that have penetrated bedrock. Please provide a contingency for confirmation of the bedrock (coring some rock (say 5 ft), especially if refusal is encountered shallower than expected, based on existing data.

34.) Section 4.5.1.2, page 4-20 -DNAPL Discussion: In the third paragraph on page 4-20, it states that DNAPL will be evaluated by inspection of water for evidence of the development of a visible sheen. DNAPL may not manifest itself in that way. Years back, GE provided EPA with a proposed DNAPL investigation report. While the actions in the report were not completely agreed to between EPA and GE, nor did the investigation ever get performed, there were still some key investigations that GE was willing to consider with respect to potential DNAPL. Specifically, GE's prior DNAPL investigation proposal (FSP, June 1997) included specific instructions for the visualization of DNAPL in soils, PID sampling, boring installations and decommissioning, monitoring well installation and sampling. In this workplan, GE seems to be proposing to install boreholes/wells using hollow stem augers or push probes, yet fails to provide any procedures for any double casing, or other means typically employed in such conditions as GE has alleged is present at Fletcher's in the Mill Street area of the site. I have attached some of the pages from the documents that GE has supplied to the EPA concerning proposed procedures for investigations involving the potential for DNAPL. GE needs to correct the workplan and the SAP for such procedures as should be employed.

35.) Section 4.5.1.2, page 4-21 - In the "Methodologies/Procedures" section, indicate which soil sampling technique will be used to collect VOC samples (see POP/FSP Appendix D for VOC sample collection options).

36.) Section 4.5.1.2, page 4-21 - While the objective is to be able to determine the extent of the excavation and therefore the total soil volume; this volume is still an estimate for the purposes of the design. Provide the basis for the determination of how and where additional soils samples will be collected beyond the boundaries identified in Figure 5? Please explain why the VOC/SVOC data, as opposed to the PCB data, will be the basis for determining the location of the test pits and the collection of samples for thermal treatability testing and for potential soil column testing.

37.) Section 4.5.2, page 4-22 - Test Pit Excavations. There does not appear to be any estimate presented for the number of test pit excavation that would be performed. While the locations and number are contingent on certain findings in the Phase I investigations, GE shall present a minimum allocation and determination of test pits based on at least the RI findings (ie - expectation of one test pit in the EB-03 area, one test pit into former landfill debris at the Elm Street location, etc.)

38.) Section 4.5.2, page 4-22 - Test Pit Excavations. Appendix B indicates that continuous air monitoring will be conducted during the test pit activities. The H&SP (Section 6) indicates that the air sampling is for employee exposure. GE shall also propose to conduct ambient (edge of property) air sampling during test pitting, to collect data that will be helpful in determining possible vapor suppression needs during full-scale excavation, both to protect site workers and the public off-site. The test pits also offer an opportunity to test out vapor suppression products at a small scale. The boring of EB-03 produced a very strong odors from the resinous material. How will the potential for a significant odor release during a test pit excavation into this area be managed?

39.) Section 4.5.2, page 4-22 - Test Pit Excavations, Proposed Activities - Please correct that SVOCs will also be analyzed for in the waste characterization samples of non-soil and site soil materials, consistent with the information presented in the methodologies section on page 4-23.

40.) Section 4.5.2, page 4-23 - The analyses listed In the "Methodologies/Procedures" section are not consistent with those listed in the "Proposed Activities" section. Please revise to be consistent.

41.) Section 4.5.3, page 4-23 - Monitoring Well Installation and Groundwater Monitoring. Please clarify how the installation of additional monitoring wells is part of the Phase II Investigation Activities yet the proposed Groundwater Elevation Monitoring (to determine seasonal low water table levels) is part of Phase I. Some of the wells proposed for monitoring in phase I will not be installed until Phase II. While the measuring of the water levels in existing wells can start as soon as possible, in Phase I, When the new wells are installed, they should then be added to the program. Please clarify that the 6-month period of monitoring (to establish seasonal low water levels) will start only once all the new wells are installed and developed.

42.) Section 4.5.3, page 4-24, proposed activities: The plan indicates that monitoring wells MW-27 and 28 will be installed to characterize "background groundwater quality". EPA would not concur that two monitoring well locations on the facility proper would constitute background, especially given the improper storage and handling of hazardous substances at the site in the past, along alterations in the site layout (driveway changes, land use changes, etc. and the location of the "lab" portion of the paint facility being in the general location of MW28. It may be appropriate to characterize those particular wells as site groundwater as well as representing contamination from areas slightly up-gradient of the Elm St. area of the site.

43.) Section 4.5.3, pages 4-25 and 4-28 - Monitoring Well Installation and Groundwater

Monitoring. The text proposes doing specific capacity tests at listed wells to determine hydraulic conductivity of the formation along the well screen. EPA does not recommend this approach. While the hydraulic conductivity could be calculated from a specific capacity test, it is not commonly done, as the math is fairly involved. This test is more commonly used as a way to describe well productivity. Also, these tests will generate substantial volumes of water IDW that will require containment (drums? Frac tanks?) and treatment/disposal. Also, these tests should not be conducted as part of well development; such testing should only be conducted on a well that has already been developed (fines removed form sand pack, etc.,).

EPA recommends an alternate approach consisting of slug tests followed by pumping tests. Rising head/falling head slug tests are commonly performed to calculate hydraulic conductivity of formations. These tests are simpler to perform in the field and to resolve mathematically, and will generate much less water IDW. Slug test data could then be used to select a few wells for pumping tests (and select appropriate pump sizes), where water is pumped from one well, while water levels are monitored in adjacent observation wells, to calculate a hydraulic conductivity. This k value is typically more representative of the formation, because the test exercises a larger volume of the formation. These data will be very helpful in planning for the dewatering of the excavations, and could also be helpful in any future groundwater modeling effort.
For open-hole bedrock wells (upgradient locations), an alternate method of determining hydraulic conductivity in the field would consist of slug tests and/or packer tests (constant head permeability tests).

44.) Section 4.5.4, page 4-30 - Soil Column Study.

EPA is still reviewing the soil column study protocol and reserves further comment on this section at this time.

The text notes that ADL theorized that PCBs are at greater depth than one would expect because co-solvency with solvents resulted in reduced partitioning into soil (lower Koc), and greater mobility. The RI (page 29) also mentions the presence of a "flocculent material" in wells MW-07A (overburden) and MW-21C (bedrock). A sample of it was analyzed and found to consist of a mixture of the following: a paint drying oil, greases, mineral oil, and acrylic paint binder. It's interesting to note that this material was observed in a bedrock well, as it indicates either a very high mobility or a preferential pathway through which it was introduced at depth. It's not clear that this material is truly a flocculent chemically, but the description was based on its appearance. Please add a discussion of GE's current understanding of how the presence of this material could affect Koc and vertical migration of PCBs. Given that PCBs sorb strongly to organics, the possibility seems to exist that PCBs sorbed into and traveled with this potentially mobile "flocculent" material. The Work Plan in Attachment A should be revised accordingly, as the Work Plan currently only looks at the effect of TCE on the sorption of PCBs (Koc).

Equal effort shall be spent on investigating the two possible scenarios that led to deep PCB vertical migration: chemical (co-solvency, reduced Koc, etc.) and physical preferential pathways (floor drains, french drains, leaking drums, septic system, etc.). See comments related to Site

Survey and Geophysical Survey.

45.) Section 4.5.6, page 4-33 - Groundwater Treatability Testing. The plan indicates that three rounds of groundwater will be collected at select monitoring wells. Which wells will the treatability testing be performed on and what is the criteria are being used to make this decision.

Elimination of the specific capacity tests will not affect the ability to collect the samples required for this testing, as well development is still required, and water from this activity can likely be used for treatability bench scale testing. In fact, if a later multi-well pumping test is done later in the program, after bench testing is complete, it could be possible to piggyback a pilot scale treatability test with the pumping test.

The Corps has experience at other sites with PCB-contaminated water, where flocculation, filtration, followed by sorption (carbon) has worked, but treatment method at Fletcher will depend entirely on the site-specific chemistry. In prior discussions, the Town has placed restrictions on disposal to the POTW. Their concern was for chlorinated compounds due to their exceedences of chlorine from their treatment system.

46.) Figure 2 - Elm Street Area. Please identify the following items/features: former building footprint, cemetery, semi-solid stain "hot spot," limits of cap, and alignment (approximate) of underground culvert that runs under the eastern portion of the site.

Also, pleased define what the initials stand for in the various sample identifiers, such as CG, CS, SS, EB, EF, EW, etc. If possible indicate what year they were collected, and by whom.

Boring EB-05A has data listed in Table 1, but the location of EB-05A does not appear to be shown in either Figure 1 or 2. Please show location on figure.

Surface soil sample 1-CS-S03-A has data listed in Table 1, but does not appear to be shown on Figure 1. Please show location on figure.

A separate figure showing only surface soil sample locations, with the PCB concentrations (ppm) plotted at each location, should be presented.

47.) Figure 3 - Mill Street Area. Please identify (label) the following items/features in this figure: culvert/drainage ditch, former shed location, the Draper building that burned down, former location of storage building (highest contamination reported to the east of this building), and 10-ft wide paved apron constructed along Mill Street.
Also, data are listed in Table 1 for samples from EB-08A, EB-10A, EB-11A, and EB-19, but the locations of these borings do not appear to be plotted on Figure 3. (Presume that borings EB-08A, 10A, and 11A are collocated with Monitoring Wells MW-08, 10, and 11.) Please add.

A separate figure showing only surface soil sample locations, with the PCB concentrations (ppm) plotted at each location.

48.) Figure 4 - Elm Street Area proposed Investigations:

A grid layout is acceptable to perform for sampling for the analysis of the extent of the contamination. However in looking at this grid marking for soil borings it shows that there are five soil borings located west of the Keyes Drive. As there is not expected to be a significant depth of PCB contamination west of the Keyes Drive, this may not represent significant information pertaining to the overall volume of soil contamination that needs to be addressed in the cleanup. EPA is concerned, that in the vicinity of EB-15, there is only one soil boring near that RI location - where a significant concentration and depth of contamination was found. Since the RI data indicated that this area has the deepest and highest levels of PCBs found at the Elm Street area, GE shall propose additional borings, to be located on a smaller grid (smaller than 50 foot) for this area, why this which may represent a large potential for an increase in the volume of the contaminated soils that will need to be addressed. If GE does not believe this information would be useful for the overall consideration of volume then please provide a justification to that end. GE shall also propose additional borings on a smaller grid for the EB/MW -3 area, since the RI indicated that it is the only other portion of the Elm Street area with PCBs at depth, along with being the location for the "hot spot" of stain-like material, both with an unknown lateral extent, and therefore could also have a significant impact on the overall depth and volume of the excavation.

Provide rationale why surface soil sampling was not included for the grid points: A0, B0, C0, O6, T14 and I16.

No information is provided for the multiple sample location notation (all surface sampling?)

The Figure notation for the surface sampling location indicates that the grid location will be sample unless useable data already exists. No notation is provided indicating the extent of the surface soil sampling beyond the boundaries noted in this figure.

The bank to the river is fairly steep. Figure 4 appears to indicate very few surface samples throughout the bank of the river and along the river edge, especially in the 11-16 range. In addition, EPA discussed the potential for GE to sample the sediments along the edges of the river to provide information as to the extent of the river sediment contamination and would like to see this included in this report as this data could also be useful to the placement of the sheet pilings along the rivers edge.

The grid line notation in Figure 4 indicates that the soil borings will be advanced to 2 feet below the *observed* water table, however the next notation for proposed soil boring locations indicates that the depths of the borings will be advanced to the identified seasonal low water table or to sheet piling/shoring needs. Section 4.4.2.2 indicates that a minimum of monthly water level measurements for *six months* will be required to establish a seasonal low water table level. Please clarify the correct field observation identification for the depths for the borings in this study.

The former basement foundation blocks were left below ground during the building demolition action (as well as old utility services) and should be noted in future design plans as well as for boring placement in this investigation. Q18, for example, may represent an area where the foundation was left in place. Also as noted earlier in the comments,

49.) Figure 5 - Mill Street Area proposed Investigations.

What is the lateral extent of the excavation at the RR tracks/Mill Street? Suggest taking bedrock cores at a few locations to characterize the rock in the event that excavation support systems (e.g. tiebacks) need to be installed.

50.) . Attachment A - General. - Work Plan: Measurement of Site-Specific Partition Coefficients for PCBs. See comments on Soil Column Study (sctn 4.5.4).

51.) Attachment A/2/1 - This section states that the sample locations for the soil column study will be chosen randomly within the contaminated site. Recommend that the locations be chosen based on laboratory results which show PCB concentrations within the ranges recommended for the study (tens to thousands of ppm).

52.) Attachment A/4/6 -The PCB analysis method (congener) specified in this attachment is not consistent with that specified for field samples (Aroclor) in the Work Plan.

PROJECT OPERATIONS PLAN

SITE MANAGEMENT PLAN

General Comment: The following information shall also be included in the Site Management Plan:

- weekly electronic progress reports
- progress status meetings (on-site)
- community relations support
- project schedule for pre-design work, with future updates during design and remedial action

1.) Section 3, page 3-3, Section 3.2.1 Exclusion Zones, last ¶: Clarify that this sentence referring to access and egress from the exclusion zone is referring to pedestrian traffic into the exclusion zone. Figure 2 of the revised Institutional Control/Access Restriction (IC/AR) Plan indicates a vehicle gate along Elm Street, presumably for trucks to enter and exit the exclusion zone. With that thought, please indicate whether or not a contaminant reduction zone/ decontamination area will therefore be included within the vicinity of the gated area along Elm Street (Section 3.7 is vague on this issue, stating that decon areas will be located during the design, however the SMP does reference that in certain circumstances, GE may require testing of equipment prior to leaving the Site.)

2.) Section 3.4, page 3-6, Access Agreements: A copy of the final, signed access agreements shall be forwarded to the EPA and NHDES.

3.) Section 3.5.1, page 3-7, site controls: This section shall be updated, as necessary, to reflect the comments and issues addressed by the final IC/AR plan.

4.) Section 3.5.1 Site Controls: If the fence location at the Elm Street area is not going to be upgraded until RA activities, please clarify what public protection and erosion control measures will be utilized for those areas where tree removal actions have occurred as part of site prep, leaving potentially contaminated soils exposed (e.g. Keyes Drive and river bank areas).

5.) Figure 2: This figure shall be upgraded to reflect the fence location as depicted in the revised Institutional Control/Access Restriction Plan. In addition, A second figure (2A?) shall be included depicting the location of the support zone(s) in the Keyes field following agreement with the Town of Milford.

The following comments apply to the POP: Sampling and Analysis Plan/Volume I - Quality Assurance Project Plan (QAPP):

The QAPP was submitted to the Quality Assurance Unit for Level 2 Technical QAPP review and for OEME Quality Assurance Office Approval the document was reviewed to verify that all required QAPP elements and information, as specified in Table 1 of the **Region I, EPA-New England QAPP Compendium of QAPP Program Requirements and Guidance**, October 1999 ("The Compendium/QAPP Manual")are present. The document was also reviewed to ensure that project quality objectives, technical activities and related QA/QC will result in data of known and documented quality that can be used in environmental decision making. This document is incomplete and does not follow the above referenced guidance. That is unfortunate as other QAPPs produced by BB&L for GE have been acceptable and were signed by this office in the past. As such, the below comments offer mainly general comments in an attempt to direct the revision of the QAPP, yet places the responsibility of addressing all the deficiencies of the document back onto the contractor.

General Comments:

1.) This document is incomplete in many ways. If GE/BBL wants to use their own format, that is acceptable as long as there is a cross walk between the R1 requirements and the sections that describe the requirements. There is a crosswalk that describes where the required elements can be found but when the reviewer tries to find the information, the appropriate information is not where its supposed to be or there is a reference to a site specific work plan that contains the information which cannot be found. If this document is supposed to be a generic QAPP, then specifics can be in site specific work plans, but there must be a standard set of QC requirements in the generic QAPP. There is no indication that this is a generic QAPP. The fact that this is a site specific QAPP, makes this unwieldy document extremely difficult to review. All elements described in the above referenced document need to be addressed even if they are not to be actually performed. If the QAPP contains all of the required elements related to required detection limits, field and laboratory QA/QC and laboratory instrument maintenance then the FSP can contain the appropriate specific SOPs that relate to sampling and analysis. There are no Laboratory QC specifics or SOPs because the laboratories have not be chosen. Please clarify when will this information will be available because this document will not be approved without acceptable missing pieces.

2.) Just because the laboratory has not been chosen as yet does not mean that the field QC and the laboratory QC requirements should not be documented by BB&L in this document. Just stating that laboratory generated limits will be used when the laboratory is contracted, is not acceptable. Having a table with some QC criteria in another part of the document is also confusing. GE/BB&L must describe the DQOs and then describe the appropriate supporting measurement performance criteria(MPC) including the required project quantitation limits(PQLs) for this project that the laboratory will have to meet. When a laboratory is chosen then they will have to

meet the MPCs, PQLs, and lab QA/QC set down in this document. The laboratory must not dictate to BB&L those requirements. Setting the site specific requirements is very important because the MPCs for field QC samples and the laboratory QC criteria will be the basis of validating the site data.

3.) The project quantitation limits(PQLs) for the designated COC do not support the Project Action Limits (PALs) for benzene,1,2-dichloroethane, trichloroethylene in water and benzo(a)pyrene and arsenic in soil. If the there is no better technology available to meet these criteria then that should be noted in a footnote. If the PQL could be lowered by an existing technology such as GC/MS SIM or ICP/MS, then it must be performed. Please combine all the PAL, PQL and MDL tables(Table 9-3 and Form 9a-1+9a-2) to combine all the COC and any other analyte that is being measured into one table. There does not seem to be a good reason for having two sets of tables. This would also cover the issue os treatability studies if and when they would be performed.

4.) It should be noted that if Benzene is a COC and EnCore samplers are to be used, benzene, ethyl benzene, and toluene may degrade considerably in the first 48 hours after sampling even if stored at 4°C. It is recommended that GE/BB&L use freezing as a preservative for soil samples placed in VOC vials to prevent loss of benzene during the holding time from the field collection to the laboratory analysis. The SOP on VOC sampling outlines four options but does not identify which will be used for this project. Please confirm which option will be used for this project and justify why that option is being used.

5.) Validating only ten percent of the data at Tier II is not acceptable especially for confirmation of clean-up criteria in remediated areas. Having all the data in a CLP data package is a must, but not validating it is a problem. EPA believes that a higher percentage of samples need to be validated at Tier II and a small percentage of samples in remediated clean soils validated at Tier III to confirm that clean-up criteria has been met. The actual validation criteria that will be used during this project must be detailed in this document. Many of those QC criteria have not been documented anywhere in this document and will not until the laboratory is contracted.

6.) There are redundant tables in the Table section and the Forms in QAPP appendices. One Form states that the QC criteria for the lab will come from the laboratory(Form 11) where another table(Table 9-5) gives QC criteria but does not show the origin of the QC criteria or a justification for the criteria. MPC and laboratory QC criteria need to be documented separately. MPCs are defined for the overall project PARCCS (precision, accuracy, representativeness, completeness, comparability, and sensitivity) parameters whereas the Lab QC criteria are the QC criteria that the lab uses to stay in analytical control. There is a difference between these criteria when validation is performed and when the data user evaluates the data to see if it meets the requirements of the DQOs. Compiling the Forms and Tables into one cohesive document is a must.

7.) Tables and forms need to indicate what field QC samples will be used to measure accuracy and precision. Form 9b does not detail or even estimate how many samples will be colleted for each of the matrices. If the numbers have not been decided then this table should refer to a table that will be supplied in the FSP or some site specific work plan to be supplied later. Saying 1/20 is not acceptable to the EPA OEME QA Office. Specific numbers or at least approximations of the total numbers must be supplied when they become available.

8.) The laboratory has some low detection limits to meet in order to determine if there are risks. Some of those limit are not going to be met for Benzo(A)pyrene in soil and benzene and other volatiles in water. The laboratory may have to use a lower detection limit method for the volatiles or use selected ion monitoring (SIM) for the semivolatiles and selected volatile compounds. The QAPP does not take into account that there will be low percent solids in some of the soil samples that will drive up those detection limits and the non detects will be at a level that risk assessment will not be possible.

9.) It is important that this QAPP document any changes that may be made in the FSP SOPs. For example, if the contractor is going to follow the "EPA Region1 Low Stress(Low Flow) Purging and Sampling Procedure" to the letter then that should be stated, and there is no need to make any changes noted, but if the contractor has made changes to the actual way the procedure is to be performed, then those changes need to be noted. EPA auditors who oversee low flow sampling always find that contractors make modifications that are not noted in the FSP or are approved by EPA. Measuring the groundwater parameters during purging is the area of most concern. An example of some problems found by EPA is the measurement of Turbidity. Turbidity must be measured outside the cell because many of the flow thru cell designs tend to collect particulate matter and measurement of turbidity in the cell will result in a falsely high turbidity measurement.

10. General comment to Section 3 : Project Organization and Responsibility: Add roles and responsibilities of the USACE personnel as EPA's oversight for the RD/RA activities.

11. Section 8.1, page 8-1 - Add sample identification codes for NAPL, waste, and air samples. Also, describe how field duplicate samples will be identified and kept blind to laboratory personnel.

12. Section 9.1 page 9-1 - The definition of method detection limits (MDLs) described in the third paragraph is not consistent with the SW846 definition. MDLs are statistically determined using soil or water samples that undergo complete extraction and analysis.

13. Section 9.1, page 9-2 - Lower reporting limits for benzo(a)pyrene are achievable using a modified method 8270 with selected ion monitoring.

14. Section 10, General Comment - Consider analysis of performance evaluation samples (obtained from EPA or a commercial source) as a quality control element for this project.

15. Section 11.2, page 11-3 - In the "Temperature Calibration" section, change "NBS" to "NIST".

16. Section 11.3.2, page 11-7 - Explain the objective of the performance evaluation standard and how it differs from the continuing calibration check standard.

17. Form 9b - Consider adding PE samples to this table (see comment no. 14).

18. Forms 24a-1 and 24a-2 - For surrogates and internal standards, explain what is meant by a frequency of 2 per sample.

19. Form 29 - Add data validation elements as described in section 16.3.1.

The following comments apply to the POP: Sampling and Analysis Plan/Volume II - Field Sampling Plan (FSP):

1.) Section 2.6.2, page 2-6 - Explain the difference between the field equipment blanks and the rinsate blanks (section 2.6.3). Rinse blanks only are shown in Table 9-4. Please revise to be consistent.

2.) Section 2-7, page 2-7 - Instructions for collection of quality assurance (QA) split samples will be provided to BBL prior to initiation of sampling activities.

3.) Appendix A/A-3/V - VOC samples should not be composited. Please revise.

4.) Appendix D/D-1/III - Add the statement that unpreserved VOC soil samples will be collected with no headspace.

5.) Appendix J, Sediment Sampling Procedures: The Pre-Design Work Plan does not indicate the sampling of sediment in accordance with the procedures outlined in this appendix. However, this information is useful and EPA has requested that GE consider adding in sediment sampling to begin to gather information related to the OU2 river contamination as well as to assist in documenting contamination at the rivers edge and provide information for sheet piling locations.

6.) Appendix N, Specific Capacity Testing Procedures: This appendix shall be revised according to comments referenced above about this testing procedure in the Pre-Design Work Plan section.

7.) Appendix S, page S-4: Step 4 to the cleaning procedures has a note from BBL to GE asking if wipe testing will be required during the equipment cleaning. Please address.

8.) Appendix T, page T-3: GE shall specify to the EPA, which monitoring wells it believes should be replaced or decommissioned as a result of the well survey, prior to taking such action.

The following comments apply to the POP: Community Relations Support Plan:

1) Site History - Elm Street: The Korean War Memorial cleanup occurred in 1996.

2) Site History - Mill Street: The 1995 residential cleanup was not performed voluntarily by GE, but rather through an Order issued by the EPA.

3) Public Notification - EPA typically releases public notices about 2-3 weeks prior to a major public meeting.

4) 3.3 Contact information: please add Tom Andrews, the NHDES project manager to this list. A Town contact should also be included.

The following comments apply to the January, 2002 Surface Water and Groundwater Monitoring Plan:

General Comment: There are many areas of this document which are copied from the Pre0design Workplan. The comments on th Pre-Design Workplan therefore also apply to the same text included in this report.

1.) Section 2.2: Site History page 2-3: The building demolition action was not a removal action but the initiation of the remedial action.

2). Section 2.3, Mill Street area: GE did not voluntarily conduct the residential cleanup action, EPA issued an Order to GE for the removal action.

3). Section 4.1.1, Overburden: The thickest part of the overburden is in the Keyes Field/Elm Street area, not near the Mill Street area.

4.) Section 4.4.2 Souhegan River Surface Water Quality: Add the Phase 1A results to this discussion.

5.) Section 4.5.2 Initial Horizontal and vertical GMZ Boundaries: In reading this discussion and looking at Figure 5: how does the Keyes Field Area fit into the GMZ boundaries? The USGS study (pump test at keyes well) indicates that the Mill Street contamination, during the period that the Keyes Well would have been in use, would circle toward Hampshire Paper and into the Keyes Field. Early well sampling indicates some Fletcher's type constituents in the Keyes Well area, though this was masked over time with the significant gasoline product that infiltrated into the field. MW18 is the westernmost well at the site in the Elm Street area, but microwells used in Phase II of the RI indicated that contamination existed beyond that boundary at the easternside of the Keyes Field . This plan does not include any additional monitoring wells to address this area.

6.) Section 5.1 Monitoring Requirements: Please refer to EPA's comments to the PDI Work Plan regarding frequency of water level measurements.

7.) Section 5.3.5 Analytic Parameters While the ROD set cleanup levels for certain compounds that exceeded a drinking water standard at the time of the ROD, an ARAR that must be met is compliance with drinking water standards. For this site, there may be degradation products of the ICL compounds, as well as not related compounds (gasoline products) which would need to understood to determine compliance with the GMZ requirements. Any degradation product would be required to be at drinking water levels at the end of the action. Please include a proposed schedule to include full TCL/TAL analysis into the sampling schedule (e.g. one full round of analysis every year/ every other year, etc).

8.) Section 5.3.6 Sampling Methods: Why does is state that the EPA low Flow procedures will *generally* be followed. Any modification the EPA's procedure shall be documented in the QAPP for EPA review and approval.

9.) Section 6.2 Water Monitoring Reports: Any compound which exceeds a drinking water standard shall be presented in the water monitoring reports.

Draft for EPA Review

GE Response to EPA May 1, 2003 Pre-Design Work Plan Comments (Phase 1 only)

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May 14, 2003

Ms. Cheryl Sprague
Remedial Project Manager
U.S. Environmental Protection Agency
1 Congress Street, Suite 1100 (HBO)
Boston, MA 02114

Subject: Response to Phase 1 Comments Contained in EPA's May 1, 2003 Letter Fletcher's Paint Works and Storage Facility Superfund Site CERCLA Docket No. 01-2001-0063

Dear Ms. Sprague:

Attached please find General Electric Company's, (GE), response to the U.S. Environmental Protection Agency's (EPA) comments on Phase 1 activities proposed for the Fletcher's Paint Works and Storage Facility Superfund Site. GE received EPA's comments via electronic mail on May 1, 2003, while a hard copy was received an May 8, 2003. EPA's comments are made on the following documents: Pre-Design Work Plan, Project Operations Plan, and the Health and Safety Plan, submitted in December 2001, and the Surface Water and Groundwater Monitoring Plan submitted in January 2002. These documents were submitted pursuant to a Unilateral Administrative Order issued by the EPA to GE on July 16, 2001.

As discussed during our May 13, 2003 call, assuming you agree with each response the EPA will provide GE written authorization to implement the Phase 1 activities by May 16, 2003.

If you have any questions or comments regarding this information, please do not hesitate to contact me at the letterhead address.

Sincerely,

Lewis S. Streeter
Remedial Project Manager

Attachment

cc: Bonnie Harrington, GE
Lowell McBurney, Blasland, Bouck & Lee
Katherine Chambers, Town Administrator, Town of Milford
Thomas Andrews, NHDES

phase 1 comments trans ltr to epa.doc

ATTACHMENT A

RESPONSE TO PHASE 1 COMMENTS

Phase I Investigation Activities

EPA Comment #14 - *4.1, page 4-2 - Health & Safety Plan (HASP). It's indicated that GE and BBL will be covered by the HASP submitted. Please clarify that EPA and Corps site visitors will also be covered by same HASP.*

Response - The following language will be added to the end of the final paragraph in Section 4.1:

Text Revision - *"The HASP will cover site visitors (including EPA and Corps personnel) provided that the site is under GE's/BBL's control (see HASP Section 2.4). Notwithstanding, pursuant to OSHA 29 CFR 1910, EPA, the Corps, or any other third party visitors maintain sole responsibility for the health and safety of its employees. Should EPA, the Corp, or any other third party elect to perform site-related work beyond GE's/BBL's control, the existing HASP may be adopted provided it is done so under written cover by the third party user."*

* * * * *

EPA Comment #15 - *4.3.1, page 4-3 - Clearing and Grubbing. The text states that vegetative material from clearing and grubbing will be chipped and disposed as yard waste. Cleared material may be chipped and disposed of as yard waste, assuming that none of the contaminants of concern on site tend to accumulate in plant matter. Grubbed material (such as roots, which would have a fair amount of probably contaminated soil attached) should be handled as PCB-contaminated material, to be treated on site or disposed off-site with the rest of the PCB-contaminated soil.*

Response - The Phase 1 work will entail removal of mostly above-grade vegetation as part of the clearing activities with minimal grubbing which will generate soil-laden debris. More extensive grubbing (e.g., removal of large root systems) will likely occur during the Remedial Action in connection with excavation activities. The following language will be added to the end of the first paragraph in Section 4.3.1:

Text Revision - *"The below grade portion of any grubbed or excavated vegetation will be consolidated on-site (Elm Street only) and managed as remediation waste during the Remedial Action."*

* * * * *

EPA Comment #16 - *4.3.1, page 4-3 - Clearing and Grubbing. Please indicate the erosion control measures that will occur with the clearing and grubbing actions related to the Elm Street area and specifically along the bank of the river. Such controls will be required to prevent the erosion of these contaminated soils into the adjacent river.*

Response - The following language will be added as a new paragraph in Section 4.3.1:

Text Revision - *"Prior to the initiation of Phase 1 site work, erosion control measures will be installed. At the Elm Street site, erosion control measures will consist of silt fence and hay bales installed on the*

upland slope along the river boundary as well as placement of hay bales on the uphill sides at select locations to divert runoff from disturbed areas. At the Mill Street site, erosion control measures will consist of hay bales installed at select locations to divert runoff from entering or leaving disturbed areas. Prior to the initiation of Phase 2 site work, additional erosion control measures will be installed at Mill Street consisting of silt fence and hay bales along the eastern side of the drainage ditch. Also, temporary relocation of erosion controls will be performed as necessary to accommodate site activities which may occur in and around site boundaries."

* * * * *

EPA Comment #17 - *4.3.2, page 4-3 Debris Removal. Upgrade to reflect current status.*

Response - The existing language in Section 4.3.2 will be deleted and replaced with the following:

Text Revision - *"A fire in October 2001 destroyed the small coal transfer building on the Draper Fuel Company parcel adjacent to the Mill Street site. In February 2002, the property owner removed the fire-related debris. Following this work, GE performed additional work at the site, which included: placing a liner within the former truck-scale pit, and backfilling the pit to surface grade; removal and off-site disposal of approximately 230 tons of surplus coal; and placement of a liner followed by a 1-foot thick soil cover over the former building footprint. This work was completed by GE in February 2002."*

* * * * *

EPA Comment #18 - *4.3.4, page 4-4 Site Security - Fencing should also be deployed around the decontamination pad area and any investigation derived waste (IDW) or other potentially contaminated debris ("to be dismantled and consolidated on-site to await characterization and disposal") left on site for any period of time at the Mill Street Area. Eventually, a fence or other form of significant restriction will be required around the entire site during excavation, so it may be simplest to deploy that fence/restriction from the outset. Upgrade to reflect comments made on ICAR Plan for the use of restrictions for the Mill Street area.*

Response - All IDW or other potentially contaminated debris will be relocated and staged at the Elm Street Site, prior to characterization and off-site disposal. The revised *Institutional Controls and Access Restriction Plan* (April 2002) further addresses these site security issues. To clarify, the existing language in Section 4.3.4 will be deleted and replaced with the following:

Text Revision - *"Site security measures to be employed during the pre-design investigations are described in the April 2002 Institutional Controls and Access Restriction Plan, Section 2.3.1 – Institutional Controls/Access Restrictions During Pre-Design and Design Phases."*

* * * * *

EPA Comment #19 - *4.4.1. Baseline Site Information - EPA suggest including provisions for establishing preconstruction baseline characteristics of abutting properties and facilities, to assist with possible claims for damage during construction. These should include installing and monitoring deformation monitoring points on abutting properties and facilities (including the RR tracks), photographing/videotaping the adjacent properties, and monitoring noise and vibrations, as appropriate.*

Response - Photographic documentation will be performed as part of the pre-design investigations. GE agrees that structural monitoring is appropriate, but maintains that it would be premature to conduct that monitoring during the pre-design investigation phase of the project. Rather, structural monitoring will be addressed in the Remedial Design/Remedial Action Work Plan, and conducted by the Supervising Contractor during the Remedial Action. To clarify this point, the following language will be added to Section 4.4.1:

Text Revision - *"Photographic documentation of site conditions will be conducted during the pre-design investigation activities described herein. Establishment of baseline structural conditions for abutting properties and facilities will be addressed in the Remedial Design while structural monitoring will be deferred until the Remedial Action phase of the project.*

* * * * *

EPA Comment #20 - *4.4.1.1. and 4.4.1.2, pages 4-5 and 4-6 - Site Survey & Geophysical Survey. Both surveys should attempt to find former floor drains, piping, former septic systems, and French drains. Given the depth of contamination, it seems possible that PCBs and other contaminants reached these depths via the preferential pathways these features would provide. TF Moran was the sub-contractor that performed the surveys during the remedial investigation.*

Response - The following modifications will be made:

Section 4.4.1.1 – Site Survey; 2nd sentence under "Proposed Activities":

Text Revision - *"... to establish the alignment and location of underground utilities in and around the Site, including, but not limited to, former floor drains, piping, former septic systems and French drains."*

Section 4.4.1.2 – Geophysical Survey, 2nd sentence under "Proposed Activities":

Text Revision - *"... and the location of underground utilities, including, but not limited to, former floor drains, piping, former septic systems and French drains."*

* * * * *

EPA Comment #21 - *4.4.1.2, page 4-7- EM-61 Electromagnetics Survey. Text proposes conducting survey using a spacing of 20 ft between lines, and collecting measurements at 5-ft intervals. Both line spacing and data collection interval are far too coarse. In general, the line spacing should be no greater than half the largest dimension for isolated targets (such as USTs). Recommend a line spacing of 5 ft, instead of 20 ft. The geophysical instrumentation should be configured to acquire digital data using a continuous sample mode, in order to achieve an adequate sample density. A sample interval of 0.1 ft to 2 ft is typical. Recommend that the instrument be set up to record a sample data point every 0.5 ft along each line (0.5 ft sample interval instead of 5 ft).*

Response - The electromagnetic (EM) methodology was intended to provide representative coverage of the site. Tighter line spacing and data collection intervals, as suggested by EPA, will result in a high degree of instrument overlap providing complete, not representative, site coverage. This highly conservative approach is not standard practice, but given the size of the site can be accomplished without dramatic impacts to task completion. Given this, the EM portion of the geophysical survey will be

modified to be consistent with EPA's comment. To clarify these points, the following language will be modified in Section 4.4.1.2, 5th paragraph under "Proposed Activities":

Text Revision - *"..... and EM measurements will be collected using a continuous, distance-based (wheel-mode) data collection setting providing data collection at 0.6-foot intervals (with 5-foot line spacing), with the data....."*

* * * * *

EPA Comment #22 - *4.4.1.2, page 4-7 - GPR Survey. Once targets have been identified by the EM survey, the GPR survey should focus on those target areas, using an even tighter line spacing (say 2.5 ft) and data sampling interval (say 0.1 to 0.2 ft). Indicate the frequency of the antennae selected for doing this work, and provide the rationale for selection, including depth of penetration and resolution. In general, lower frequency antennae will provide a greater depth of penetration, but have lower resolution than higher frequency antennae. What is the desired depth of GPR investigation?*
A higher frequency antenna (shorter signal wavelength) can resolve smaller features than a lower frequency antenna (longer signal wavelength). Generally, a feature that is ¼ to 1/3 the size of the signal wavelength can be resolved by the antenna and GPR electronics. What is the smallest feature the survey is interested in detecting?

Response - The ground penetrating radar (GPR) survey will focus on target areas, which is consistent with the existing text (see Section 4.4.1.2 – Geophysical Survey, 6th paragraph, 6th sentence under "Proposed Activities"). With respect to line spacing, a spacing of 2.5 feet will be used for point targets (e.g., potential USTs) and 10 feet for linear targets (e.g., buried pipes). With respect to the data sampling interval, the GPR instrument will be operated in a continuous data collection mode along each transect. With respect to antennae frequency and selection rationale, two antennae will be utilized for this survey, including a 200 megahertz (mHz) antenna for deeper targets up to approximately 20 feet and a 400 mHz antenna for shallower targets up to approximately 10 feet. These two antennae will be used interchangeably in the field based on observed resolution and site conditions. With respect to EPA's question on detection size, this equipment is generally capable of detecting metal targets 1-inch in size per foot of depth (depending on site conditions). For example, a 4-inch diameter pipe at a depth of 4 feet, or perhaps a 12-inch drum carcass at 12 feet, and so on. To clarify these points, the following language will be included as an additional paragraph at the end "Proposed Activities" in Section 4.4.1.2:

Text Revision - *"The GPR survey will be conducted using a line spacing of 2.5 feet for point targets (e.g., potential USTs) and 10 feet for linear targets (e.g., buried pipes). The instrument will be operated in a continuous data collection mode along each transect. Two antennae will be utilized for this survey, which will include a 200 megahertz (mHz) antenna for deeper targets up to 20 feet, and a 400 mHz antenna for shallower targets up to 10 feet. These two antennae will be used interchangeably in the field based on depth requirements, observed resolution, and site conditions."*

* * * * *

EPA Comment #23 - *4.4.1.4, page 4-10, Traffic and Road Survey - To estimate traffic volume (in the event other resources prove insufficient), the plan indicated that an automatic traffic device would be employed at Elm Street, Mill Street and at the Keyes Drive for one month. However, the plan does not indicate a representative month. The fluctuation of traffic on each of the streets may vary depending on*

the season (school in, school out, summer use of Keyes Field, etc.). How will this fluctuation be addressed should this survey be employed?

Response - NHDOT and the Town of Milford have well documented data on traffic volume along Elm Street. These data will be used to target specific months for deployment of traffic counting devices on Elm Street, Mill Street and/or Keyes Drive. In addition, the plan states a counting device would be deployed for a "minimum" of one month. These devices will be operated for a longer period should the need exist. No changes to the Pre-Design Work Plan are proposed in response to this comment.

Text Revision – None

* * * * *

EPA Comment #24 - *4.4.1.4, page 4-11, Traffic and Road Survey - The plan calls for the evaluation of the volume and type of pedestrian traffic. Will the survey include the evaluation of potential alternate routing of pedestrian traffic during the remedial action activities?*

Response - Alternative routing of pedestrian traffic will be addressed in the Remedial Design with additional details provided in the Remedial Action Work Plan. To clarify this point, the following sentence will be added to the end of the 4th paragraph under "Methodologies/Procedures" in Section 4.4.1.4:

Text Revision - *"Alternative routing of pedestrian traffic, which may be necessary during the remedial action activities, will be addressed in the Remedial Design and subsequently the Remedial Action Work Plan.*

[Note: though not directly related to EPA's Comment #24, the topic of pedestrian traffic during the Phase 2 investigations was discussed in a May 13, 2003 conference call between GE and EPA. The topic of pedestrian traffic control will be addressed in GE's future revisions to the Phase 2 portion of the Pre-Design Work Plan.]

* * * * *

EPA Comment #25 - *4.4.1.4, page 4-11, Traffic and Road Survey - The plan includes a visual inspection of Elm Street out to Route 101 for any issues related to increased traffic during the remedial action. As a side note related to a review of an off-site disposal option, GE should consider (but not include in this plan) the potential impacts of additional traffic along the roads and routes should a local contractor be utilized to supply the quantity of backfill material needed for such an option.*

Response - Acknowledged. No changes to the Pre-Design Work Plan are proposed in response to this comment.

Text Revision - None

* * * * *

EPA Comment #26 - *4.4.1.5, page 4-12- Monitoring Well Survey. EPA suggests using a hand-held magnetomer ("line locator") to aid in finding flush-mounted wells (road boxes) and using survey*

(traditional or GPS) to aid in locating wells. The survey shall evaluate the condition of the measuring point, and if there is any question about whether or not the well pipe has been modified in any fashion, re-survey the measuring point.

Response - These common tools and techniques will be employed as part of the monitoring well survey activities. No changes to the Pre-Design Work Plan are proposed in response to this comment.

Text Revision - None

* * * * *

EPA Comment # 27 - *4.4.1.5, page 4-12- Monitoring Well Survey. - In meeting the objective of the monitoring well survey, of evaluating the usefulness of the existing wells, grab samples using bottom-loading bailers will be employed. Historically, well mw-07 has had a flocculent material in it, if allowed to site over a period of several months. If GE intends to sample this flocculent material, a sample would best be pulled during the first bailer grab, as there may not be a significant amount of floc in the well to collect another sample in the actual groundwater sampling event, if it follows too closely.*

Response - A grab sample will be obtained to check for the presence of any non-aqueous material in all monitoring wells (not just MW-07) during the monitoring well survey activities. The original intent of this Phase 1 task was that no analytical sampling of these potential materials would be conducted during this initial inspection, and any consideration for characterization of these materials would be deferred until Phase 2 as part of the groundwater sampling activities. To clarify these points, the following sentences will be inserted following the 3rd sentence under "Methodologies/Procedures" in Section 4.4.1.5:

Text Revision - *"A grab sample will be obtained to check for the presence of any non-aqueous phase material in all monitoring wells inspected during the monitoring well survey activities. No analytical sampling of these potential materials will occur during the Phase 1 investigation activities."*

[Note: As discussed in the May 13, 2003, conference call, the need to analyze/retain these materials will be further discussed within GE's response to the Phase 2 comments.]

* * * * *

EPA Comment #28 - *4.4.2.1, page 4-13 background concentration for arsenic - The pre-design work plan states a proposed background concentration for arsenic of 11 mg/kg. While it does appear that this may be acceptable as a background concentration for arsenic, EPA requires additional discussion with NHDES and the NH Dept. of Public Health and Bureau of Risk Assessment regarding acceptance of this level and will get back to GE following such discussion. The Work Plan also states that if Phase II surface soil sampling indicates that there are significant areas of the Site with arsenic concentrations greater than 11 mg/kg, then soil sampling and statistical analysis will be performed. GE shall present a time frame for when such a decision will be proposed to the EPA and how the decision may affect the overall schedule for completion of the pre-design investigations within the time frames estimated.*

Response - In a May 13, 2003 conference call between GE and EPA representatives, EPA indicated that the same logic applied to PAHs (see Comment #29 below) would apply to arsenic. This clarification eliminates the need to conduct background sampling for arsenic.

Text Revision – Addressed under EPA Comment #29 below.

* * * * *

EPA Comment #29 - *4.4.2.1, page 4-14 background concentration for PAHs - In our telephone conversation on May 7th, EPA and GE discussed GE's concerns of "chasing" PAHs. It was discussed that, in lieu of the EPA addressing the deficiencies of the proposed baseline PAH soil study, the results of which would be a significant undertaking of a sampling effort of statistical significance, EPA will recognize that GE will not be required to pursue PAHs in the surface soils, that exceed the ROD based cleanup levels, beyond the point where PCB concentrations meet the ROD cleanup level of 1 ppm in surface soils.*

Response - Acknowledged. This clarification, in combination with the clarification under EPA Comment #28 above, eliminates the need to conduct background sampling for PAHs and arsenic. Section 4.4.2.1 will be modified as follows:

2nd paragraph under "Data Needs" – Modify the 3rd sentence as follows:

Text Revision - *"This was recognized and addressed in the ESD, clarified in a May 7, 2002 telephone conversation, and referenced in EPA's May 1, 2003 comment letter where EPA recognized that GE will not be required to excavate surface soils containing PAHs that exceed the ROD-based cleanup levels beyond the point where PCB concentrations meet the ROD-based cleanup level of 1 ppm in surface soils. This was further clarified by EPA in a May 13, 2003 conference call where EPA indicated that GE will not be required to excavate surface soils containing arsenic that exceed the ROD-based cleanup levels beyond the point where PCB concentrations meet the ROD-based cleanup level of 1 ppm in surface soils. Based on these clarifications, no background sampling will be conducted."*

2nd paragraph under "Data Needs" – Delete the 4th sentence, and then delete the remainder of Section 4.4.2.1.

* * * * *

EPA Comment #30 - *4.4.2.2, page 4-14 - Groundwater Elevation Monitoring. Precipitation data should be collected either on site, or from the closest monitoring station (**http://lwf.ncdc.noaa.gov/oa/ncdc.html**) to corroborate with groundwater monitoring data. These data may also be helpful in assessing how responsive the groundwater table is to rainfall, and may be helpful in planning and designing the dewatering system for the excavations.*

Response - Precipitation data will be collected using existing monitoring data. To clarify this point, the following language will be incorporated into Section 4.4.2.2:

Text Revision - *"As part of the groundwater elevation monitoring activities, GE will obtain local precipitation data from the National Climatic Data Center, or equivalent resource."*

* * * * *

EPA Comment #31 - *4.4.2.2, page 4-15- Groundwater Elevation Monitoring.*

[Please note that EPA raises multiple issues in Comment #31 – we have broken this comment down to address each issue separately.]

EPA Comment #31a - *Add rationale for selecting wells to be included in monitoring well survey activities. For example, it's assumed that the "B" wells are included, but not the "A" wells, at Elm Street because excavation will extend only to the seasonal low water table, and the "B" wells are set in "shallow overburden" (vs. "deep overburden" for the "A" wells). Why is isn't MW-25B and C part of the Mill street activity? It would be helpful to have water level measurements in both sets of wells to help in evaluating vertical gradients on the site, adjacent to the river.*

Response - EPA is correct in its assumption that the "B" wells were included for Elm Street monitoring since they are screened in the "shallow overburden", which is where the seasonal low water table will occur.

MW-25B and MW-25C were not included in the Mill Street groundwater monitoring because they are off-site, upgradient wells. However, these wells will be included in the groundwater elevation monitoring program.

With respect to the vertical gradients, there is sufficient data in EPA's Remedial Investigation (RI) Report to estimate the vertical gradients. Therefore, no additional groundwater elevation monitoring is proposed in these other hydrogeologic units at the Elm Street Site.

In response to this comment, the 2nd paragraph in Section 4.4.2.2, *Proposed Activities* will be changed as follows:

Text Revision - *"... MW-24C, MW-25B, and MW-25C – as indicated on Figure 5."*

* * * * *

EPA Comment #31b - *The text indicates that water levels would be measured once per month over a 6-month period during the pre-design investigation. Will this 6-month period cover the time of year when expected seasonal low water table conditions would be expected to occur? Please add discussion of when seasonal low water table conditions are expected to occur at this site.*

Response - To address the seasonal variability of water table elevations, GE proposes to expand the monthly groundwater elevation monitoring for a period of 12 months. The monitoring program will include the new wells to be installed as part of Phase 2 (as discussed in Section 4.4.2.2 and our response to comment 31a) for at least a six-month period during the Pre-Design activities, and will continue for an additional period beyond the submission of the Pre-Design Report until 12 months of data are collected. The timing of the beginning of this activity will depend upon EPA approval of the Phase 2 activities.

In response to EPA's question, the seasonal low water table will vary throughout the year depending upon the season. Please note, we interpret "seasonal low" to mean the lowest groundwater elevation during an annual cycle, and not during one particular season. With this in mind, it is expected that the low water table conditions will occur in or around the September/October/November timeframe. Recognizing this, flexibility was built into the program to accommodate these anticipated variations in timing. Specifically, please reference Section 5 in the draft Surface Water and Groundwater Monitoring Plan (December

2001), which states that the initial 6-month (now 12-month) period will be augmented by continued groundwater monitoring to be conducted under this element of the remedial program. The intention is to use all relevant data to establish the seasonal low water table elevation.

To clarify this point, the same sentence in Paragraphs 1 and 2 in Section 4.4.2.2 *Proposed Activities* will be changed as follows:

Text Revision - *"...at the locations listed above for a minimum of 12 months during and beyond the pre-design investigation activities."*

This revision will also affect text in the Surface Water and Groundwater Monitoring Plan, which will be revised at a later date.

* * * * *

EPA Comment #31c - *EPA also strongly recommends collecting water level measurements at least weekly. Transducers could be set in wells, with data loggers recording water levels daily, requiring minimal additional effort. Sufficient data must be collected to support water level elevations said to represent "seasonal low water table conditions." EPA also suggests obtaining water level records for "ambient wells" maintained by the USGS, to help support claim that water levels represent seasonal lows.*

Response - The remedial design parameter at Elm Street is based on a seasonal water table elevation condition. A seasonal water level does not fluctuate materially on a daily or weekly basis. Thus, monthly measurements over an extended monitoring period will provide a sound basis for defining a seasonal trend, and provide more than sufficient data for design. Therefore, although EPA's recommendation is acknowledged, monthly monitoring – particularly when extended over a 12-month period and augmented by USGS data -- is more than adequate given the purpose for these data. The type of data developed by transducers and data loggers are not needed.

Water level records for "ambient wells" maintained by the USGS will be used to support the determination of the low water table. In fact, these data will be useful to help evaluate seasonal trends and keep the site-specific monitoring as efficient as possible.

The following text will be added to the end of Section 4.4.2.2:

Text Revision - *"Water level records will be obtained from "ambient wells" maintained by the USGS, if available. These data will be used to evaluate seasonal groundwater elevation trends on a regional basis."*

* * * * *

EPA Comment #31d - *EPA notes that installation of a new shallow overburden well, adjacent to the EB-15 area), would provide useful groundwater information given that this location is near a zone that seems to have the highest levels of PCB contamination at depth. Water samples from this well could provide a worst-case scenario for treatment of water collected (during dewatering) from this part of the excavation.*

Response - There is a piezometer (PZ-1) proposed in the general vicinity of former soil boring EB-15. In response to EPA's comment, this piezometer will be eliminated from the scope of work, and a new water

table monitoring well will be installed at the former EB-15 location to be designated MW-29B. Installation and sampling of this additional well will be performed as part of the Phase 2 activities. The following text in the 1st paragraph under "Proposed Activities" in Section 4.4.2.2 will be modified as follows:

Text Revision - *"In addition, four new water-table monitoring wells (MW-26B, MW-27B, MW-28B and MW-29-B) will be installed at the Elm Street Area,..."*

* * * * *

EPA Comment #31e - *While excavation at Elm Street will extend only to the seasonal low water table, there is no guarantee that excavation activities will take place during seasonal low water levels. It is assumed that BBL is collecting necessary data and planning for the probable necessity of doing some dewatering of the excavation at Elm Street.*

Response – Section 4.5.3.1 of the Pre-Design Work Plan presents information regarding the activities proposed to determine hydraulic gradient, hydraulic conductivity and recharge/dewatering rates. That information, combined with the proposal to collect 12-months of groundwater elevation data (see response to EPA Comment #31B, above) will provide sufficient information to address the data needs associated with the potential dewatering activities at the Elm Street Site. For this reason, no revision to the text is proposed in response to this specific comment.

Text Revision – None

* * * * *

Draft for EPA Review

EPA Letter Approving Phase 1 Pre-Design Investigation Activities dated May 15, 2003

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FLETCHER - LOAG - GEN

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

May 15, 2003

Mr. Lewis Streeter
General Electric Company
320 Great Oaks Office Park
Suite 323
Albany, NY 12203

Re: Pre-Design Studies
Phase I activities

Dear Mr. Streeter:

At GE's request, the EPA gives an approval of the Pre-Design Investigation Phase I activities as first defined in the December 2000, Draft Pre-Design Investigation Work Plan(s), as commented on by the EPA in its May 1, 2003 letter and as modified according to GE's May 15, 2003 response to comment letter.

In compliance with the Order, GE will initiate Pre-Design Investigation field actions related to these Phase I Activities on May 16, 2003.

If you have any questions, please call me at (617) 918-1244.

Sincerely,

Cheryl L. Sprague

Cheryl L. Sprague
Remedial Project Manager
Office of Site Remediation and Restoration

cc: John Beling
Scott Acone
Tom Andrews
Bonnie Harrington
Mike Jasinski
Katy Chambers

Draft for EPA Review

EPA Letter Modifying Re-Submittal Deadline for PD Work Plan dated June 5, 2003

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engineers, scientists, economists

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

June 5, 2003

Ms. Jane Gardner
General Electric Company
Corporate Environmental Programs
3135 Easton Turnpike, M.C. W1L
Fairfield, CT 06431

Re: Fletcher's Paint Works and Storage Facility Superfund Site
Modifications to Administrative Order, CERCLA Docket No. 01-2001-0063

Dear Ms. Gardner:

On May 1, 2003 EPA sent a letter disapproving GE's submission of the Pre-Design Work Plan and Project Operations Plans, and required submission of these documents after the incorporation of EPA's comments. Section XIV of the Order requires GE to resubmit the plans, after incorporating EPA's comments, within 21 days from notice of disapproval or as directed by EPA.

EPA and GE held a conference call on May 13, 2003, and met in EPA's Boston office on May 29, 2003 to discuss the comment letter. The next submittal required is the resubmission of the Pre-Design Work Plan and Project Operations Plan, which is due on June 19, 2003.

If you have any questions regarding the enclosed, please call me at (617) 918-1712 or Cheryl Sprague, the project manager, at (617) 918-1244.

Sincerely,

John Beling
Enforcement Counsel

cc: Mike Jasinski, EPA
Cheryl Sprague, EPA
Scott Acone, US ACE
Bonnie Harrington, GE
Lowell McBurney, BBL

Draft for EPA Review

GE Response to EPA May 1, 2003 Comments on PD Work Plan, POP, and WMP dated June 16, 2003

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engineers, scientists, economists

ATTACHMENT A

RESPONSE TO PRE-DESIGN WORK PLAN COMMENTS
JUNE 16, 2003

EPA Comment #1

1.) To support design, a more detailed discussion of subsurface conditions will be required. GE shall add boring logs, cross sections, and information on site-specific geology, in the Pre-Design Investigation Report to support any conclusions or design considerations derived from these investigations.

Response

These features will be addressed in the Pre-Design Report.

Text Revision

A new subsection (Section 4.6 – Pre-Design Report) has been included in the revised Pre-Design Work Plan, which describes the Pre-Design Report contents.

* * * * *

EPA Comment #2

2.) Several utility lines may be present on the Keyes Drive, Mill Street and Elm Street areas. GE shall report all readily available information which delineates these utility corridors. The results of the surveys to be performed during these investigations shall include information pertaining to these utilities and shall be presented in the final Pre-Design Investigation Report.

Response

These features will be addressed in the Pre-Design Report.

Text Revision

A new subsection (Section 4.6 – Pre-Design Report) has been included in the revised Pre-Design Work Plan, which describes the Pre-Design Report contents.

* * * * *

EPA Comment #3

3.) The plan does not appear to adequately address the issue of DNAPL mobility during boring and well installations. GE has submitted numerous reports and memorandums detailing your position with respect to this and therefore, it is unclear why precautionary measures described by GE in earlier submissions have been minimized in this plan. Specifically, there is no description in the appendices for any double casing for boring installations. Appendix E refers only to the use of hollow stem auger drilling methods and push point techniques. Appendix A references driven casing use in conjunction with hollow stem augering, which then

references Appendix E for specific procedures. Appendix E does not actually present specific procedures other than to reference the ASTM standard that will be used. In comparison, I have attached pages form *[sic]* a BEAK report submitted on behalf of GE for prior boring /well installations which presents much greater detail and addresses the precautionary measures that are taken in such site conditions.
GE should also refer to the EPA RI procedures and where differences of methodologies are presented.

Response

The revised work plan provides detailed procedures to identify and respond to DNAPL, if any, encountered during drilling in the overburden (Section 4.5.1.2) or bedrock (Section 4.5.3.2). These procedures are intended to minimize the potential for downward DNAPL mobilization by properly abandoning any borings in which DNAPL is observed. Because there is no evidence of any extensive DNAPL pools at the site, and the purpose of this investigation is not to determine the presence of DNAPL, BBL did not originally include a procedure for double-cased soil boring installations. If DNAPL is repeatedly encountered at a proposed data collection location and deeper soil sampling or a monitoring well installation is required below the observed DNAPL depth, a double-casing approach will be used to advance soil borings below this depth. An SOP for double casing will be added to the revised Project Operations Plan (FSP Appendix E) as a contingency for use in investigating the potential presence of DNAPL, beyond what is already included. Additional information is provided below in the response to EPA Comment #34.

Text Revision

The use of a double-cased drilling method has been referenced in Sections 4.5.1.2 and 4.5.3.2, which describe drilling activities at the Mill Street Area. This information has also been incorporated into the revised Project Operations Plan (FSP Appendix E).

* * * * *

EPA Comment #4

4.) GE indicated that they may be willing to sample sediment from the River in an effort to review the extent of PCB contamination. While this work would be related to operable unit 2, it may prove cost-effective to look at a possible combining of any sediment action and the cleanup of Elm Street under the OU1 remedy. The original RI indicated that there is a risk related to the PCB contamination in the sediments and biota in the river but that this contamination did not appear to extend far from the banks of the site. Any potential river action would need to be proceeded by an EECA or an FS report. This could be accomplished within the time frame of the pre-design/remedial design of OU1 with the chosen cleanup action being tied into the OU1 remedial action. The sediment data would also be helpful, should GE desire to place any sheet piling or other barrier at the extent of contamination in the sediment beyond the river edge. GE should consider this sediment sampling and either include the event as part of this plan, or recommend an alternative means of communicating this effort.

Response

For a number of reasons, GE submits that any activities associated with the river, including sediment sampling, should be part of a separate OU-2 process and not as part of expanded OU-1 sampling activities:

- Foremost, GE does not want to divert attention from the source control work on OU-1. GE has only recently started Phase 1 of the fieldwork for the OU-1 pre-design investigation and a revised work plan still needs to be approved encompassing the changes to both Phases 1 and 2 of the pre-design work. Once approved, the OU-1 pre-design and OU-1 remedial design will require substantial time and effort by GE and EPA over the coming months. In our view, the parties would be best served by devoting our energies to successfully moving forward on OU-1.

- GE is also concerned that opening up OU-2 issues and requiring an EE/CA or an FS report contemporaneous with the OU-1 pre-design and remedial design work would be a significant distraction from the OU-1 effort. Indeed, despite the parties' best intentions; expanding work into OU-2 could end up delaying progress on OU-1. EPA made the judgment to handle the two areas of the Site separately when it issued its ROD, and it should not change that decision.

- Sediment sampling is not necessary to complete the OU-1 work. PCB analyses in sediment are not required in order to install sheet piling to define the limit of OU-1 work at the Elm Street Area. EPA's Record of Decision defines the geographic limit of the Elm Street Area under OU-1, and river sediments adjacent to the Elm Street Area are under OU-2, not OU-1.

- In addition to adding another layer of complexity because of the work itself, OU-2 matters should be kept separate because there are other PRPs that would have to be considered in any OU-2 process. GE submits that complicating OU-1 discussions and activities with OU-2 issues would be counterproductive at this time.

- Regarding the cost effectiveness of combining remedial actions for OU-1 and OU-2, it is difficult to establish the extent and magnitude of cost savings, if any, without first understanding the scope and design of the respective remedies. Given the added complexities stated above, we feel that these factors greatly outweigh the potential cost savings, if any.

GE remains committed to working cooperatively with EPA at this Site. If EPA believes that is appropriate at this time to pursue OU-2, notwithstanding the reasons stated above for maintaining OU-1 and OU-2 as separate activities as set forth in the ROD, GE asks that EPA provide more details about the activities necessary for the OU-2 process.

Text Revision

None.

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EPA Comment #5 – Omitted by EPA.

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EPA Comment #6

6.) The UAO does not address nor mention the EPA's allowance for the consideration of a design of an off-site disposal option for the contaminated soils. Therefore, GE shall in include in Section 1.2 a sentence that clearly indicates that, separate to the required actions under the UAO, GE may perform additional data collection and analysis during the pre-design investigations to review an option for the off-site disposal of the contaminated soils. These additional studies are not required nor do they appertain to compliance with the

UAO, but would occur concurrent with the activities to be conducted for compliance with the UAO for the remedial design and remedial action of the ROD remedy.

Response

Addressed – see text revision below.

Text Revision

Section 1.2 has been modified to clarify that additional data collection related to an off-site soil disposal option is separate to the actions required under the UAO. This distinction was originally stated in the last paragraph of Section 3.1, which EPA suggests be deleted from Section 3.1 in a later comment (Comment #13 below). This paragraph was deleted from Section 3.1, and was inserted into Section 1.2 to be responsive to both EPA Comments #6 and #13.

* * * * *

EPA Comment #7

7.) A table shall be added which shows a summary of the quantity of field samples and associated quality control samples to be collected for each sampling activity. State the rationale for the selection of the chosen PCB analysis method (congener/Aroclor) (see section 9.2.1 of the POP/QAPP) and selection of filtered or unfiltered water samples (see section 9.2.2 of the POP/QAPP).

Response

Addressed – see text revision below.

Text Revision

Tables 3 and 4 have been added to the revised Pre-Design Work Plan, which summarize the estimated sample quantities, locations, and rationale for soil and groundwater samples, respectively. These tables are referenced in Section 4.1. This information has also been incorporated into the revised Project Operations Plan.

* * * * *

EPA Comment #8

8.) A Table shall be added which details the proposed soil and groundwater sampling locations, depths and analyses to be performed.

Response

Addressed – see text revision below.

Text Revision

Tables 3 and 4 have been added to the revised Pre-Design Work Plan, which summarize the estimated sample quantities, locations, and rationale for soil and groundwater samples, respectively. These tables are referenced in Section 4.1. This information has also been incorporated into the revised Project Operations Plan.

* * * * *

EPA Comment #9

9.) 2.2.1, Elm Street Area - The building demolition was not a removal action, but an interim action for the remedial action. The Elm Street building slab was broken up and disposed off-site at a regulated facility. The granite block foundation was left in place at the end of the 2000/2001 EPA action.

Response

Addressed - See text revision below.

Text Revision

Section 2.2.1 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #10

10). 2.2.2, Mill Street Area, page 2-4 - In the summer of 1995 GE did not voluntarily perform the residential cleanup, rather GE was Ordered by the Agency to perform this cleanup action. The asphalt curtain, however, was not included in the Oder, but conducted by GE so as to prevent the re-contamination of the residential properties from site run-off.

Response

Addressed - See text revision below.

Text Revision

Section 2.2.2 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #11

11). 2.3 Summary of Data - Table 1 - The numbers/and or units are not correct. Please provide corrected tables, with results shown in the same units in which the cleanup levels are expressed (mg/kg, or ppm). Some values are listed as "0" in this table, however the key indicates that ND should have been used. Please revise to non-detect (ND) and show reporting limit. Also there are no dates for the Mill Street exploratory borings (EB-07 thru EB-21).

Response

A revised Table 1 was previously submitted to EPA by GE on February 28, 2002 with the revised numbers, units and values noted. Table 1 has been updated to include the Mill Street boring dates, where available.

Text Revision

A revised Table 1 has been included in the revised Pre-Design Work Plan.

* * * * *

EPA Comment #12

12.) 2.3 Summary of Data - /Table 2 - The numbers/and or units are not correct. Please provide corrected tables, with results shown in the same units in which the cleanup levels are expressed (mg/kg, or ppm). Indicate reporting limits for samples which showed non-detects for analytes.

Response

A revised Table 2 was previously submitted to EPA on February 28, 2002 with revised numbers and units. This table has been updated to indicate reporting limits as contained in EPA's RI Report.

Text Revision

A revised Table 2 has been included in the revised Pre-Design Work Plan.

* * * * *

EPA Comment #13

13.) 3.1, page 3-4 last paragraph - Delete this entire paragraph.

Response

Addressed under EPA Comment #6 above.

Text Revision

See text revision to EPA Comment #6 above.

* * * * *

Phase I Investigation Activities

Note: EPA Comments #14 through #31 relate to the Phase 1 investigation activities. These comments have been previously addressed in GE's letter dated May 14, 2003, and approved by EPA in a letter dated May 15, 2003. Therefore, EPA Comments #14 through 31 are not included herein.

Phase II Investigation Activities

EPA Comment #32

[Please note that EPA raises multiple issues in Comment #32 – we have broken this comment down to address each issue separately.]

EPA Comment #32a

Section 4.5.1.1, page 4-18 - Elm Street Area. Please add discussion of why the various tests are required and how they will be used. It wouldn't appear that all of these tests would be required for designing excavation shoring/sheeting, but may be of interest to the treatability study and/or the disposal facility (compaction characteristics).

Response

Soil sampling and analysis includes a variety of elements beyond delineation. Since the subsurface soils will be excavated, and potentially treated on site and used as backfill, geotechnical testing is required for both excavation (i.e., shoring/sheeting) and restoration design. Specifically, Standard Proctor testing and remolded compressive strength are components of the restoration design (i.e., compaction requirements and pavement design), and the remainder of the testing can be applied to both aspects of design.

Text Revision

Section 4.5.1 and other related text have been revised to include a paragraph that addresses the multi-purpose nature of the soil sampling.

* * * * *

EPA Comment #32b

Please clarify if the test for "organic carbon content" is intended to be the chemical analysis for Total Organic Carbon (TOC) or the mechanical analysis for organic content using a furnace to burn off the organic matter (ASTM D 2974). It may be helpful to run the test both ways, as the geotechnical test for organic content tests a much larger sample volume compared to the TOC type of analysis.

Response

The mechanical analysis for organic content (i.e., using a furnace to burn off the organic matter) will be used on the subsurface samples collected during the boring program; whereas, the chemical analysis for Total Organic Carbon (TOC) will be used on the samples collected during the installation of groundwater monitoring wells. By performing the mechanical test on soil that will be excavated, the amount of material that will be burned off during thermal desorption can be estimated. Thus, the amount of additional replacement material for backfilling activities can also be estimated. In addition, a correlation between water content and organic content will provide a better understanding of the physical characteristics of the subsurface soils and how these elements relate to the thermal treatment process. The data obtained from the chemical analysis of organic content will assist in understanding the relationship between the soil conditions and the groundwater (i.e., by use of partitioning coefficients).

Text Revision

Section 4.5.1.1 has been revised to clarify the selection and rationale related to both the mechanical and chemical analyses for organic carbon content.

* * * * *

EPA Comment #32c

It would be helpful to determine the moisture content and specific gravity of the soil (ASTM D 5550) for treatability testing. EPA also suggests doing some testing (ASTM D 1556, etc.) to determine unit weight of soil, for estimating tonnage for treatment/disposal.

Response

Moisture content testing and density testing will be beneficial and in fact this testing will occur as part of other tests (i.e., Atterberg limits and triaxial compression testing, respectively). For density testing of in-place soils, we intend to obtain samples in Shelby tubes which will provide an undisturbed soil sample most representative of site conditions. The in-place density procedure noted (ASTM D-1556) is considered suitable for testing of replaced materials as part of compacted fill earthwork activities where it will be applied during the remedial action phase of the work. In addition, we will include specific gravity testing.

Text Revision

Section 4.5.1.1 has been revised to clarify the physical testing.

* * * * *

EPA Comment #32d

See comments to Figure 4 for more EPA comments regarding the phase II soil sampling event.
Objectives - While the objective is to be able to determine the extent of the excavation and therefore the total soil volume; this volume is still an estimate for the purposes of the design. Provide the basis for the determination of how, when and where additional surface and subsurface soils samples will be collected beyond the boundaries identified in Figure 4.

Response

As noted under "Objectives" in Section 4.5.1.1, the soil sampling (both surface and subsurface) will be iterative in nature. The initial soil sampling (both surface and subsurface) will be conducted at the outer-most grid locations shown on Figure 4. The results from these samples will determine subsequent sampling locations in accordance with the specified grid spacing (25 feet – surface, 50 feet – subsurface) in combination with the step-in/step-out logic diagram presented on Figure 6 (new figure – note that the original Figure 6 has been deleted since it showed background soil sampling locations, which are no longer necessary). Based on this approach, the final location and number of soil sampling locations will vary from those initial grid locations shown on Figure 4. The sampling and analytical activities will be sequenced to provide a continual flow of data throughout the soil sampling program to minimize mobilization/demobilization cycles.

Text Revision

Section 4.5.1.1 has been revised to clarify the step-in/step-out logic. In addition, a new Figure 6 has been developed which presents a decision tree for the step-in/step-out logic.

* * * * *

EPA Comment #32e

What activities will be conducted during the soil boring activities to ensure the stability of the granite walls surrounding and supporting the cemetery?

Response

Before starting soil borings near the cemetery, the granite wall will be inspected by an engineer and photo documented. It is also anticipated that the same type of controls used during the building demolition will be used, including placement of soil to provide additional support.

Text Revision

Section 4.5.1.1 has been revised to clarify the protection of the granite walls near the cemetery.

* * * * *

EPA Comment #33

[Please note that EPA raises multiple issues in Comment #33 – we have broken this comment down to address each issue separately.]

EPA Comment #33a

Section 4.5.1.2, page 4-20 - Mill Street Area. See above comments for the Elm Street area. Also, "TOC" is listed here; again, is this what is intended?

Response

See Responses to EPA Comment #32 above.

Text Revision

Section 4.5.1.2 has been revised in accordance with the corresponding revisions in Section 4.5.1.

* * * * *

EPA Comment #33b

VOCs/SVOCs will be sampled at the location of the highest PID reading according to the methodologies writeup. This sampling was not included as part of analysis in the general writeup, on the prior page. Also

please explain why are the Mill Street subsurface soils are *[sic]* being sampled for VOCs/SVOCs but there is no mention of this sampling for the Elm Street soil borings?

Response

The VOC/SVOC sampling is being conducted at Mill Street only to support the soil column testing activity, should it be performed. At each of the soil borings that will be drilled in the Mill Street Area during Phase II activities, the soil interval with the highest FID reading will be selected for VOC/SVOC analysis. In the event that there are no detectable VOCs observed during the soil screening, the split spoon sample interval immediately above the observed water table will be analyzed for VOCs/SVOCs. If no observed water table is encountered in the overburden, the split spoon sample interval immediately above the bedrock surface will be analyzed for VOCs/SVOCs. The VOC concentrations will provide a basis to determine appropriate TCE concentrations in the batch samples associated with the column tests, if performed.

Text Revision

Section 4.5.1.2 has been revised to clarify why VOC/SVOC sampling is being performed and how a specific sampling interval will be selected.

* * * * *

EPA Comment #33c

Also, text indicates that continuous sampling will be done to the top of bedrock, as determined by auger refusal. This can be misleading in till material that can contain cobbles/boulders large enough to cause early refusal above bedrock. Field crew should be made aware of existing data at nearby borings that have penetrated bedrock. Please provide a contingency for confirmation of the bedrock (coring some rock (say 5 ft), especially if refusal is encountered shallower than expected, based on existing data.

Response

The anticipated elevation of the bedrock surface will be carefully evaluated by the field crew based on historical information from the RI, bedrock cores to be installed as part of the Phase 2 program, and field observations. Typically, if refusal conditions are encountered at a shallower than expected depth (e.g., boulder, rubble), the boring will be abandoned and relocated following consultation with the on-site EPA representative.

Text Revision

Section 4.5.1.2 has been revised to clarify how the bedrock surface will be interpreted.

* * * * *

EPA Comment #34

34.) Section 4.5.1.2, page 4-20 -DNAPL Discussion: In the third paragraph on page 4-20, it states that DNAPL will be evaluated by inspection of water for evidence of the development of a visible sheen. DNAPL may not manifest itself in that way. Years back, GE provided EPA with a proposed DNAPL investigation report. While the actions in the report were not completely agreed to between EPA and GE, nor did the investigation ever get performed, there were still some key investigations that GE was willing to consider with

respect to potential DNAPL. Specifically, GE's prior DNAPL investigation proposal (FSP, June 1997) included specific instructions for the visualization of DNAPL in soils, PID sampling, boring installations and decommissioning, monitoring well installation and sampling. In this workplan, GE seems to be proposing to install boreholes/wells using hollow stem augers or push probes, yet fails to provide any procedures for any double casing, or other means typically employed in such conditions as GE has alleged is present at Fletcher's in the Mill Street area of the site. I have attached some of the pages from the documents that GE has supplied to the EPA concerning proposed procedures for investigations involving the potential for DNAPL. GE needs to correct the workplan and the SAP for such procedures as should be employed.

Response

The work plan provides detailed procedures sufficient to identify DNAPL during drilling in the overburden (Section 4.5.1.2) or bedrock (Section 4.5.3.2). The procedures currently include FID screening, detailed soil and rock core inspection for visible DNAPL, and jar shake tests. These well-recognized procedures will provide an effective basis to identify DNAPL, if any, during drilling. BBL has found the jar shake test method to be highly sensitive and effective for identifying DNAPL in soil samples. According to Pankow and Cherry (1996), comparative tests of methods to visually assess NAPL in soil showed that simple soil-water shake tests had similar reliability to other methods that are much more cumbersome to apply in the field (e.g., use of UV lamps, addition of hydrophobic dye, centrifuging, etc.). This determination was reached even on soil samples with "residual" (i.e., small, immobile quantities of) NAPL. In circumstances where DNAPL saturation in soil could be sufficient to become remobilized in response to drilling, the proposed soil-water shake test will be highly effective for identifying DNAPL. To help clarify this point, a new SOP for the jar shake tests has been added to the revised Project Operations Plan.

If potentially mobile DNAPL is encountered, drilling will be terminated and the boring will be grouted or a properly constructed DNAPL monitoring well will be installed. These procedures will limit the potential for remobilizing DNAPL. If the investigation depth has not been achieved when DNAPL is encountered, a replacement soil boring will be drilled next to the initial boring to obtain the necessary data. If DNAPL is repeatedly encountered at a proposed data collection location and deeper soil sampling or monitoring well installation is required below the DNAPL depth, a double-casing approach will be used to advance soil borings below the depth where DNAPL was observed. An SOP for double casing has been added to the revised Project Operations Plan as a contingency for potential investigation of DNAPL.

Text Revision

The use of a double-cased drilling method has been referenced in Sections 4.5.1.2 and 4.5.3.2, which describe drilling activities at the Mill Street Area. This information has also been incorporated into the revised Project Operations Plan.

* * * * *

EPA Comment #35

35.) Section 4.5.1.2, page 4-21 - In the "Methodologies/Procedures" section, indicate which soil sampling technique will be used to collect VOC samples (see POP/FSP Appendix D for VOC sample collection options).

Response

The EnCore™ sample technique (Appendix D) will be used for VOC sample collection.

Text Revision

"Methodologies/Procedures" under Sections 4.5.1.1 and 4.5.1.2 have been revised to reflect this requested clarification.

* * * * *

EPA Comment #36

[Please note that EPA raises multiple issues in Comment #36 – we have broken this comment down to address each issue separately.]

EPA Comment #36a

Section 4.5.1.2, page 4-21 - While the objective is to be able to determine the extent of the excavation and therefore the total soil volume; this volume is still an estimate for the purposes of the design. Provide the basis for the determination of how and where additional soils samples will be collected beyond the boundaries identified in Figure 5?

Response

See Response to Comment #32 above, subsection (d) as the same analysis applies.

Text Revision

Section 4.5.1.2 has been revised to reflect this requested clarification. A new Figure 6 has also been added which reflects this requested clarification as well.

* * * * *

EPA Comment #36b

Please explain why the VOC/SVOC data, as opposed to the PCB data, will be the basis for determining the location of the test pits and the collection of samples for thermal treatability testing and for potential soil column testing.

Response

The PCB data, in combination with the VOC/SVOC data, will be used to help determine the location of test pits and related samples.

Text Revision

Section 4.5.1.2 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #37

37.) Section 4.5.2, page 4-22 - Test Pit Excavations. There does not appear to be any estimate presented for the number of test pit excavation that would be performed. While the locations and number are contingent on certain findings in the Phase I investigations, GE shall present a minimum allocation and determination of test pits based on at least the RI findings (ie - expectation of one test pit in the EB-03 area, one test pit into former landfill debris at the Elm Street location, etc.)

Response

A minimum of three test pits will be installed at both the Elm Street and Mill Street areas. At Elm Street, test pits will be installed at the following locations: former soil boring EB-03 location, former landfill area, and the location of the resinous material. Additional test pits at Elm Street, if any, will be sited based on the Phase 1 results. At Mill Street, the three test pits will be spaced evenly across the site, and adjusted as necessary based on the Phase 1 results.

Text Revision

Section 4.5.2 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #38

38.) Section 4.5.2, page 4-22 - Test Pit Excavations. Appendix B indicates that continuous air monitoring will be conducted during the test pit activities. The H&SP (Section 6) indicates that the air sampling is for employee exposure. GE shall also propose to conduct ambient (edge of property) air sampling during test pitting, to collect data that will be helpful in determining possible vapor suppression needs during full-scale excavation, both to protect site workers and the public off-site. The test pits also offer an opportunity to test out vapor suppression products at a small scale. The boring of EB-03 produced a *[sic]* very strong odors from the resinous material. How will the potential for a significant odor release during a test pit excavation into this area be managed?

Response

Appendix B has been revised to include a plan for perimeter air monitoring including dust monitoring and organic vapor monitoring. This air monitoring will be conducted in addition to personal air monitoring referenced in the HASP. Appendix B has also been revised to clarify vapor suppression techniques including limiting the size and duration of open excavations and the use of tarps or other covers over exposed soils and/or spoils. The plan will also account for a commercially available vapor suppression product, which will be available on-site.

Text Revision

A reference to perimeter air monitoring has been included in Section 4.5.2. Appendix B in the FSP has been revised to include a perimeter air monitoring plan for dust monitoring and organic vapor monitoring during test pit implementation.

* * * * *

EPA Comment #39

39.) Section 4.5.2, page 4-22 - Test Pit Excavations, Proposed Activities - Please correct that SVOCs will also be analyzed for in the waste characterization samples of non-soil and site soil materials, consistent with the information presented in the methodologies section on page 4-23.

Response

Addressed – see text revision below.

Text Revision

"Proposed Activities" under Section 4.5.2 has been revised to inelude SVOCs.

* * * * *

EPA Comment #40

40.) Section 4.5.2, page 4-23 - The analyses listed In the "Methodologies/Procedures" section are not consistent with those listed in the "Proposed Activities" section. Please revise to be consistent.

Response

Addressed – see text revision below.

Text Revision

"Proposed Activities" and "Methodologies/Procedures" under Section 4.5.2 have been revised to be consistent.

* * * * *

EPA Comment #41

41.) Section 4.5.3, page 4-23 - Monitoring Well Installation and Groundwater Monitoring. Please clarify how the installation of additional monitoring wells is part of the Phase II Investigation Activities yet the proposed Groundwater Elevation Monitoring (to determine seasonal low water table levels) is part of Phase I. Some of the wells proposed for monitoring in phase I will not be installed until Phase II. While the measuring of the water levels in existing wells can start as soon as possible, in Phase I, When *[sic]* the new wells are installed, they should then be added to the program. Please clarify that the 6-month period of monitoring (to establish seasonal low water levels) will start only once all the new wells are installed and developed.

Response

This comment was previously clarified in the response to EPA Comment #31, provided as part of the Phase 1 responses submitted on May 14, 2003. The EPA agreed to these responses and approved the Phase 1 activities in a May 15, 2003 letter.

Text Revision

Sections 4.5.3.1 and 4.5.3.2 have been revised to clarify the timing of this activity and to be consistent with EPA-approved language related to the Phase 1 responses.

* * * * *

EPA Comment #42

42.) Section 4.5.3, page 4-24, proposed activities: The plan indicates that monitoring wells MW-27 and 28 will be installed to characterize "background groundwater quality". EPA would not concur that two monitoring well locations on the facility proper would constitute background, especially given the improper storage and handling of hazardous substances at the site in the past, along alterations in the site layout (driveway changes, land use changes, etc. and the location of the "lab" portion of the paint facility being in the general location of MW28. It may be appropriate to characterize those particular wells as site groundwater as well as representing contamination from areas slightly up-gradient of the Elm St. area of the site.

Response

Addressed – see text revision below.

Text Revision

The reference related to MW-27 and MW-28 in Section 4.5.3 has been changed to "upgradient".

* * * * *

EPA Comment #43

43.) Section 4.5.3, pages 4-25 and 4-28 - Monitoring Well Installation and Groundwater Monitoring. The text proposes doing specific capacity tests at listed wells to determine hydraulic conductivity of the formation along the well screen. EPA does not recommend this approach. While the hydraulic conductivity could be calculated from a specific capacity test, it is not commonly done, as the math is fairly involved. This test is more commonly used as a way to describe well productivity. Also, these tests will generate substantial volumes of water IDW that will require containment (drums? Frac tanks?) and treatment/disposal. Also, these tests should not be conducted as part of well development; such testing should only be conducted on a well that has already been developed (fines removed form sand pack, etc.).

EPA recommends an alternate approach consisting of slug tests followed by pumping tests. Rising head/falling head slug tests are commonly performed to calculate hydraulic conductivity of formations. These tests are simpler to perform in the field and to resolve mathematically, and will generate much less water IDW. Slug test data could then be used to select a few wells for pumping tests (and select appropriate pump sizes), where water is pumped from one well, while water levels are monitored in adjacent observation wells, to calculate a hydraulic conductivity. This k value is typically more representative of the formation, because the test exercises a larger volume of the formation. These data will be very helpful in planning for the dewatering of the excavations, and could also be helpful in any future groundwater modeling effort.

For open-hole bedrock wells (upgradient locations), an alternate method of determining hydraulic conductivity in the field would consist of slug tests and/or packer tests (constant head permeability tests).

Response

BBL has conducted hundreds of specific capacity tests in unconsolidated and fractured bedrock formations, and has found that they are easier to conduct and interpret than slug tests or constant-head packer tests. The use of specific capacity data to estimate transmissivity and hydraulic conductivity is described in many papers in the literature (e.g., Brown, 1963; Walton, 1962; Lohman, 1972; Bradbury and Rothschild, 1985; Driscoll, 1986; ASTM, 1994). BBL uses a spreadsheet program to solve for transmissivity and hydraulic conductivity using specific capacity equations published by Walton (1962). This method of data reduction is straightforward and efficient. In contrast, slug-test data interpretation requires subjective curve-matching or "best-fit" line selection. Additionally, slug test data reduction can be complicated by several factors, including the presence of a partially saturated sand pack surrounding the well screen (Bouwer & Rice, 1976; Bouwer, 1989). Moreover, permeable formations, like the sand and gravel unit at the Milford Site, can produce oscillating data that are difficult to interpret (Kruseman & de Ridder, 1990).

Specific capacity tests are easy to conduct in the field. They involve measurement of three parameters: pumping rate; pumping duration; and drawdown. These parameters are easy to measure in any formation with any pumping rate. In addition, by monitoring drawdown at nearby wells, specific capacity tests can even provide an indication of horizontal and vertical anisotropy (similar to more extensive pumping tests).

We believe that specific capacity tests provide hydraulic conductivity measurements that are superior to slug test data based on the following points supported by technical literature:

- Specific capacity tests affect a larger zone of the formation than slug tests do. Hydraulic conductivity measurements increase with the scale of the tested zone (Rovey and Cherkauer, 1995; ASTM, 1996).

- Slug tests affect only the area immediately surrounding the well, and therefore underestimate larger scale hydraulic conductivity. Specific capacity tests influence a larger area around the well, and therefore provide more reliable hydraulic conductivity data (Rovey and Cherkauer, 1995; ASTM, 1996).

- Specific capacity test results approach the accuracy of pumping tests with multiple observation wells (Rovey and Cherkauer, 1995).

BBL has performed numerous specific capacity tests at sites where extensive pumping tests were also performed. For example, at the Solvents Recovery Service of New England, Inc. Superfund Site in Southington, Connecticut (EPA-led, Region 1 site), BBL performed specific capacity tests of two monitoring wells that had just been installed in the middle and bottom sections of a glacial outwash aquifer similar to the sand and gravel layer at the Milford, New Hampshire site. Specific capacity data collected *at the end of well development pumping* yielded horizontal K estimates of 27 ft/day and 52 ft/day, respectively, with a mean value of 40 ft/day. A nearby extraction well, screened through the same depth intervals, was pumped for seven days as part of a remedy effectiveness evaluation. The K value deduced from that pumping test, using distance drawdown analysis with dozens of observation wells, was 41 ft/day. These data, and similar data sets from other sites where BBL has been involved, indicate that specific capacity tests produce high quality hydraulic conductivity data.

Moreover, specific capacity data would not be done *during* well development, but would be obtained at the *end* of well development pumping. In our experience, that approach will provide useful and reliable hydraulic conductivity data. The typical procedure is to perform gentle surging for approximately 30 minutes to free fines from the sand pack. The well is then pumped at a constant rate to remove the turbid water resulting from surging, which further enhances the hydraulic connection to the formation and improve the clarity of the

pumped water. At the *end* of the pumping period, after the well development is complete, a final drawdown measurement is obtained immediately before turning off the pump. Thus, the drawdown measurement used in specific capacity data analysis is obtained after development is complete. This approach economizes hydraulic conductivity data collection when pumping is performed for the purpose of well development, and produces high quality data. Useful data sets can also be obtained during purging prior to groundwater sampling.

Based on the above information, and as discussed in the May 29, 2003 meeting between EPA and GE representatives, BBL will use specific capacity testing as described.

Text Revision

None.

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EPA Comment #44

44.) Section 4.5.4, page 4-30 - Soil Column Study.

EPA is still reviewing the soil column study protocol and reserves further comment on this section at this time.

The text notes that ADL theorized that PCBs are at greater depth than one would expect because co-solvency with solvents resulted in reduced partitioning into soil (lower Koc), and greater mobility. The RI (page 29) also mentions the presence of a "flocculent material" in wells MW-07A (overburden) and MW-21C (bedrock). A sample of it was analyzed and found to consist of a mixture of the following: a paint drying oil, greases, mineral oil, and acrylic paint binder. It's interesting to note that this material was observed in a bedrock well, as it indicates either a very high mobility or a preferential pathway through which it was introduced at depth. It's not clear that this material is truly a flocculent chemically, but the description was based on its appearance. Please add a discussion of GE's current understanding of how the presence of this material could affect Koc and vertical migration of PCBs. Given that PCBs sorb strongly to organics, the possibility seems to exist that PCBs sorbed into and traveled with this potentially mobile "flocculent" material. The Work Plan in Attachment A should be revised accordingly, as the Work Plan currently only looks at the effect of TCE on the sorption of PCBs (Koc).

Equal effort shall be spent on investigating the two possible scenarios that led to deep PCB vertical migration: chemical (co-solvency, reduced Koc, etc.) and physical preferential pathways (floor drains, french drains, leaking drums, septic system, etc.). See comments related to Site Survey and Geophysical Survey.

Response

It is acknowledged that EPA has not completed its review of the soil column study. We have, however, prepared a preliminary technical response to the initial comments provided by EPA.

EPA's comments on the soil column study center on the presence and extent of a flocculent material, and its possible effect on PCB mobility. At the May 29 meeting, GE and EPA agreed that the ultimate measure of soil-water partitioning due to co-solvency, flocculent, or any combination, will be largely determined by the downgradient water quality to be measured in the proposed monitoring wells north of the Mill Street Area.

Thus, it was agreed that there was no need to try to resolve this technical issue until more data are gathered. However, it was also agreed that GE would include in its response, its conceptual understanding of these issues, as summarized below.

a) GE believes that the soil column study responds to the co-solvency issues raised by EPA in the FS, which focused on TCE increasing PCB mobility. The laboratory soil-column/leaching test, as described in the PD Work Plan, is designed to measure the K_{oc} for PCBs in the presence of representative TCE concentrations, and was designed to be responsive to EPA's findings (see Appendix C - "Evaluation of Enhanced Transport Rate at Mill Street", April 1996 FS Report) .

b) The Mill Street Area was formerly used for the storage of various chemicals used in paint manufacturing, including TCE and PCBs. Because of the very small scale of the Mill Street Area, the various waste materials likely were stored and released within a very close proximity at the surface. Thus the presence of these compounds is not solely due to partitioning and migration, but also likely due to localized contamination and sampling/drilling through former source areas.

c) As discussed in the May 29 meeting, another potential explanation for the presence of the flocculent at depth is that it may have been driven downward by drilling during the Remedial Investigation. This is supported by the fact that the flocculent has been encountered at bedrock monitoring well MW-21C. In our view, the physical features which EPA references (e.g., floor drains, french drains, leaking drums, septic system, etc) do not represent likely preferential pathways that could explain the occurrence of the flocculent at bedrock depth, as such physical features are relatively shallow in relation to the bedrock.

d) Also as discussed on May 29, the available information about the flocculent suggests that it is a heavy, viscous material, which would not be expected to be highly mobile in the subsurface. Specifically, the flocculent collected from well MW-07A was a dense material containing polydimethylsiloxanes, polyvinylstearates, acrylic compounds, and hydrocarbons (ADL, 1994). These materials have extremely high molecular weights and would therefore be expected to strongly adhere to soil or bedrock.

e) Another question raised by EPA in the May 29 meeting was the decision point on when and if the soil column study is to be undertaken. In response, the decision point will be based on two key factors. The first factor will be the extent and distribution of PCBs in excess of the current Mill Street subsurface Soil Cleanup level of 1 ppm. The second factor will be the concentration of PCBs detected in groundwater at downgradient monitoring wells, which have been proposed as part of the pre-design investigations.

In summary, once EPA completes its review of the soil column study, and provides additional comments, if any, GE will respond to EPA's comments in full and propose appropriate revisions to the study.

Text Revision

None.

* * * * *

EPA Comment #45

[Please note that EPA raises multiple issues in Comment #45 – we have broken this comment down to address each issue separately.]

EPA Comment #45a

Section 4.5.6, page 4-33 - Groundwater Treatability Testing. The plan indicates that three rounds of groundwater will be collected at select monitoring wells. Which wells will the treatability testing be performed on and what is the criteria are being used to make this decision.

Response

Selection of monitoring wells to be sampled for the groundwater treatability testing is a function of representative water quality, excavation footprint and depth, and hydraulic conductivity and yield. Based on our current understanding, the proposed monitoring wells from which treatability samples will be collected will include: MW-3B and MW-26B (Elm Street Area); and MW-7A and MW-22A (Mill Street Area).

Text Revision

Section 4.5.6 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #45b

Elimination of the specific capacity tests will not affect the ability to collect the samples required for this testing, as well development is still required, and water from this activity can likely be used for treatability bench scale testing. In fact, if a later multi-well pumping test is done later in the program, after bench testing is complete, it could be possible to piggyback a pilot scale treatability test with the pumping test.

Response

If specific capacity testing is not performed, treatability samples from the above wells will be collected during well development.

Text Revision

Section 4.5.6 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #45c

The Corps has experience at other sites with PCB-contaminated water, where flocculation, filtration, followed by sorption (carbon) has worked, but treatment method at Fletcher will depend entirely on the site-specific chemistry. In prior discussions, the Town has placed restrictions on disposal to the POTW. Their concern was for chlorinated compounds due to their exceedences of chlorine from their treatment system.

Response

The Remedial Design will consider discharge limitations by the POTW.

Text Revision

Section 4.5.6 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #46

46.) Figure 2 - Elm Street Area. Please identify the following items/features: former building footprint, cemetery, semi-solid stain "hot spot," limits of cap, and alignment (approximate) of underground culvert that runs under the eastern portion of the site.

Also, pleased define what the initials stand for in the various sample identifiers, such as CG, CS, SS, EB, EF, EW, etc. If possible indicate what year they were collected, and by whom.

Boring EB-05A has data listed in Table 1, but the location of EB-05A does not appear to be shown in either Figure 1 or 2. Please show location on figure.

Surface soil sample 1-CS-S03-A has data listed in Table 1, but does not appear to be shown on Figure 1. Please show location on figure.

A separate figure showing only surface soil sample locations, with the PCB concentrations (ppm) plotted at each location, should be presented.

Response

These features will be addressed in the Pre-Design Report.

Text Revision

A new subsection (Section 4.6 – Pre-Design Report) has been included in the revised Pre-Design Work Plan, which describes the Pre-Design Report contents.

* * * * *

EPA Comment #47

47.) Figure 3 - Mill Street Area. Please identify (label) the following items/features in this figure: culvert/drainage ditch, former shed location, the Draper building that burned down, former location of storage building (highest contamination reported to the east of this building), and 10-ft wide paved apron constructed along Mill Street.
Also, data are listed in Table 1 for samples from EB-08A, EB-10A, EB-11A, and EB-19, but the locations of these borings do not appear to be plotted on Figure 3. (Presume that borings EB-08A, 10A, and 11A are collocated with Monitoring Wells MW-08, 10, and 11.) Please add.

A separate figure showing only surface soil sample locations, with the PCB concentrations (ppm) plotted at each location.

Response

These features will be addressed in the Pre-Design Report.

Text Revision

A new subsection (Section 4.6 – Pre-Design Report) has been included in the revised Pre-Design Work Plan, which describes the Pre-Design Report contents.

* * * * *

EPA Comment #48

48.) Figure 4 - Elm Street Area proposed Investigations:

[Please note that EPA raises multiple issues in Comment #48 – we have broken this comment down to address each issue separately.]

EPA Comment #48a

A grid layout is acceptable to perform for sampling for the analysis of the extent of the contamination. However in looking at this grid marking for soil borings it shows that there are five soil borings located west of the Keyes Drive. As there is not expected to be a significant depth of PCB contamination west of the Keyes Drive, this may not represent significant information pertaining to the overall volume of soil contamination that needs to be addressed in the cleanup.

Response

Five soil borings will be eliminated from the west side of Keyes Drive at the following grid points on Figure 4: G2, K4, M6, O8, and Q8. Subsurface sampling on the west side of Keyes Drive, if necessary, will be determined by step-out sampling locations as clarified under EPA Comment #32 above.

Revision

Figure 4 has been revised to remove soil sampling designations from the following grid points: G2, K4, M6, O8, and Q8.

* * * * *

EPA Comment #48b

EPA is concerned, that in the vicinity of EB-15, there is only one soil boring near that RI location - where a significant concentration and depth of contamination was found. Since the RI data indicated that this area has the deepest and highest levels of PCBs found at the Elm Street area, GE shall propose additional borings, to be located on a smaller grid (smaller than 50 foot) for this area, why this which may represent a large potential for an increase in the volume of the contaminated soils that will need to be addressed. If GE does not believe this information would be useful for the overall consideration of volume then please provide a justification to that end. GE shall also propose additional borings on a smaller grid for the EB/MW -3 area, since the RI indicated that it is the only other portion of the Elm Street area with PCBs at depth, along with being the location for the

"hot spot" of stain-like material, both with an unknown lateral extent, and therefore could also have a significant impact on the overall depth and volume of the excavation.

Response

The areas in and around former locations EB-15 and EB/MW-3 are centrally located within the site and are expected to be excavated to the full depth (to be determined in the Remedial Design). Thus, more detailed delineation was not considered necessary for these areas. Should the grid sampling data suggest otherwise, step-out/step-in borings will be identified based on the delineation data.

Revision

None.

* * * * *

EPA Comment #48c

Provide rationale why surface soil sampling was not included for the grid points: A0, B0, C0, O6, T14 and I16.

Response

Surface soil sampling at grid points A0, B0, C0, T14 and I16 were not included because they are at or beyond the site boundary and/or there is pre-existing EPA RI data. Surface sampling at these locations (as well as other locations), if necessary, will be determined by step-out sampling locations as clarified under EPA Comment #32 above.

Revision

None.

* * * * *

EPA Comment #48d

No information is provided for the multiple sample location notation (all surface sampling?)

Response

The multiple sampling location notation represents historical samples collected by the Corps, on behalf of EPA during the building demolition.

Revision

None.

* * * * *

EPA Comment #48e

The Figure notation for the surface sampling location indicates that the grid location will be sample unless useable data already exists. No notation is provided indicating the extent of the surface soil sampling beyond the boundaries noted in this figure.

Response

The notation on usable data acknowledges EPA RI data, which will be considered as part of the overall data set for delineation of surface soils.

Revision

None.

* * * * *

EPA Comment #48f

The bank to the river is fairly steep. Figure 4 appears to indicate very few surface samples throughout the bank of the river and along the river edge, especially in the 11-16 range. In addition, EPA discussed the potential for GE to sample the sediments along the edges of the river to provide information as to the extent of the river sediment contamination and would like to see this included in this report as this data could also be useful to the placement of the sheet pilings along the rivers edge.

Response

The sampling grid will be adjusted in the field to conform to the slope along the river, and not be based on a 2-dimensional plane, as depicted on Figure 4. This will result in additional sample locations along this alignment. These locations will be physically located in the field during the site survey activities in Phase 1, and the locations will be shown on the site survey drawing. See Response to EPA Comment # 4 relative to sampling of river sediments.

Revision

None.

* * * * *

EPA Comment #48g

The grid line notation in Figure 4 indicates that the soil borings will be advanced to 2 feet below the observed water table, however the next notation for proposed soil boring locations indicates that the depths of the borings will be advanced to the identified seasonal low water table or to sheet piling/shoring needs. Section 4.4.2.2 indicates that a minimum of monthly water level measurements for six months will be required to establish a seasonal low water table level. Please clarify the correct field observation identification for the depths for the borings in this study.

Response

The grid line notation is correct. The intention is to advance soil borings to a depth of 2 feet below the observed water table. The logic is that the seasonal low water table elevation will not have been established (except on a regional basis) when these borings are installed, and the additional 2 feet is intended to be a buffer for water table fluctuations. The depth language under the soil boring notation is less clear and will be removed for clarity.

Revision

The legend on Figure 4 has been revised to remove the depth language under the soil boring notation.

* * * * *

EPA Comment #48h

The former basement foundation blocks were left below ground during the building demolition action (as well as old utility services) and should be noted in future design plans as well as for boring placement in this investigation. Q18, for example, may represent an area where the foundation was left in place. Also as noted earlier in the comments,

Response

The former basement foundation blocks and other subsurface debris will be noted in the Remedial Design. These and other obstacles will neeessitate some degree of flexibility in the field for the final location of soil borings. These adjustments will be made through consultation with EPA's on-site representative.

Revision

None.

* * * * *

EPA Comment #49

49.) Figure 5 - Mill Street Area proposed Investigations.

What is the lateral extent of the excavation at the RR tracks/Mill Street? Suggest taking bedrock cores at a few locations to characterize the rock in the event that excavation support systems (e.g. tiebacks) need to be installed.

Response

The lateral extent of the excavation will be determined in the Remedial Design. Also, refer to the response to EPA Comment #32d above related to expansion/contraction of the sampling grid. Bedrock cores are already proposed as part of the groundwater monitoring well installation. No revisions to the Pre-Design Work Plan will be made in response to this comment.

Revision

None.

* * * * *

EPA Comment #50

50.) Attachment A - General. - Work Plan: Measurement of Site-Specific Partition Coefficients for PCBs. See comments on Soil Column Study (sctn 4.5.4).

Response

See Response to EPA Comment # 44 above.

Text Revision

None.

* * * * *

EPA Comment #51

51.) Attachment A/2/1 - This section states that the sample locations for the soil column study will be chosen randomly within the contaminated site. Recommend that the locations be chosen based on laboratory results which show PCB concentrations within the ranges recommended for the study (tens to thousands of ppm).

Response

Specific soil samples to be used in laboratory column/leaching tests will be selected to cover an appropriate range of detected PCB concentrations.

Text Revision

None.

* * * * *

EPA Comment #52

52.) Attachment A/4/6 -The PCB analysis method (congener) specified in this attachment is not consistent with that specified for field samples (Aroclor) in the Work Plan.

Response

The soil column study will include comparative PCB analyses to be consistent with PCB data developed as part of the field investigation.

Text Revision

None.

* * * * *

ATTACHMENT A

RESPONSE TO SITE MANAGEMENT PLAN COMMENTS

EPA Comment

General Comment: The following information shall also be included in the Site Management Plan:

- weekly electronic progress reports
- progress status meetings (on-site)
- community relations support
- project schedule for pre-design work, with future updates during design and remedial action

Response

a, b) The addition of weekly electronic progress reports and on-site progress status meetings will be addressed in the Site Management Plan (SMP).

c) Regarding community relations support, the last paragraph of Section 1.1 of the Site Management Plan (SMP) indicated that that document is one of several plans that comprise the Project Operations Plan (POP). A separate component of the POP is the Community Relations Support Plan (CRSP). Further, Section 3.3 of the SMP references the current general contact list provided in Section 3.3 of the CRSP. Nevertheless, additional text regarding community relations support has been added to the SMP.

d) The location of project schedules for each phase of the component of the RD/RA activities has been addressed in the SMP.

Text Revision

a, b) Sections 3.1 and 3.3 have been revised to include information regarding weekly electronic progress reports and on-site progress status meetings.

c) Section 3.3 has been revised to include additional information regarding community relations support.

d) Section 3.3 has been revised to include additional information regarding the location of project schedules for each component of the RD/RA activities.

* * * * *

EPA Comment #1

1.) Section 3, page 3-3, Section 3.2.1 Exclusion Zones, last ¶: Clarify that this sentence referring to access and egress from the exclusion zone is referring to pedestrian traffic into the exclusion zone. Figure 2 of the revised Institutional Control/Access Restriction (IC/AR) Plan indicates a vehicle gate along Elm Street, presumably for trucks to enter and exit the exclusion zone. With that thought, please indicate whether or not a contaminant reduction zone/decontamination area will therefore be included within the vicinity of the gated area along Elm Street (Section 3.7 is vague on this issue, stating that

decontamination areas will be located during the design, however the SMP does reference that in certain circumstances, GE may require testing of equipment prior to leaving the Site.)

Response

Access to and egress from the Exclusion Zone (EZ) must be through the Contaminant Reduction Zone (CRZ) regardless of whether the traffic is vehicular or pedestrian in nature. With respect to Figure 2 of the Revised IC/AR Plan, it is anticipated that all access to and egress from the EZ during the performance of the Pre-Design activities at the Elm Street Site will be through the existing vehicular gate. Therefore, the CRZ (including decontamination areas/pads) for both workers and vehicles will be situated adjacent to this gate. The CRZ will be sized and situated to accommodate performance of the pre-design activities (i.e., performance of soil borings and surface soil sampling) proposed in the vicinity of the gate. Should an alternate access location be identified for performance of the pre-design activities (i.e., installation of alternate vehicular/pedestrian access gates) the corresponding CRZ will be located adjacent to this access location. Based on this response, no changes are proposed for the text of the SMP to address this comment.

Text Revision

None.

* * * * *

EPA Comment #2

2.) Section 3.4, page 3-6, Access Agreements: A copy of the final, signed access agreements shall be forwarded to the EPA and NHDES.

Response

The access agreements will be submitted to EPA and NHDEA under separate cover.

Text Revision

Section 3.4 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #3

3.) Section 3.5.1, page 3-7, site controls: This section shall be updated, as necessary, to reflect the comments and issues addressed by the final IC/AR plan.

Response

Addressed - See text revision below.

Text Revision

Section 3.5.1 has been revised to reflect this requested clarification.

EPA Comment #4

4.) Section 3.5.1 Site Controls: If the fence location at the Elm Street area is not going to be upgraded until RA activities, please clarify what public protection and erosion control measures will be utilized for those areas where tree removal actions have occurred as part of site prep, leaving potentially contaminated soils exposed (e.g. Keyes Drive and river bank areas).

Response

Site clearing activities will be performed to accommodate access during completion of pre-design investigation activities and will consist of tree, branch, and/or brush removal only. Grubbing of stumps and associated root systems will be performed at a later date as part of the remedial action. Nevertheless, appropriate erosion controls (e.g., silt fencing and/or hay bales) will be installed as part of the site preparation activities, as specified in the revised PD Work Plan.

Text Revision

Section 3.5.1 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #5

5.) Figure 2: This figure shall be upgraded to reflect the fence location as depicted in the revised Institutional Control/Access Restriction Plan. In addition, A second figure (2A?) shall be included depicting the location of the support zone(s) in the Keyes field following agreement with the Town of Milford.

Response

Addressed - See revision below.

Revision

Figure 3 (formerly Figure 2 - the figures in the SMP were renumbered to reflect the order in which they are refereneed in the document) has been revised to reflect this requested clarification. Also, Figure 2 in the revised SMP has been revised to show the location of the proposed Support Zone in the Keyes Field area.

ATTACHMENT A

RESPONSE TO QUALITY ASSURANCE PROJECT PLAN COMMENTS

General Comments:

EPA Comment #1

1.) This document is incomplete in many ways. If GE/BBL wants to use their own format, that is acceptable as long as there is a cross walk between the R1 requirements and the sections that describe the requirements. There is a crosswalk that describes where the required elements can be found but when the reviewer tries to find the information, the appropriate information is not where its supposed to be or there is a reference to a site specific work plan that contains the information which cannot be found. If this document is supposed to be a generic QAPP, then specifics can be in site specific work plans, but there must be a standard set of QC requirements in the generic QAPP. There is no indication that this is a generic QAPP. The fact that this is a site specific QAPP, makes this unwieldy document extremely difficult to review. All elements described in the above referenced document need to be addressed even if they are not to be actually performed. If the QAPP contains all of the required elements related to required detection limits, field and laboratory QA/QC and laboratory instrument maintenance then the FSP can contain the appropriate specific SOPs that relate to sampling and analysis. There are no Laboratory QC specifics or SOPs because the laboratories have not be chosen. Please clarify when will this information will be available because this document will not be approved without acceptable missing pieces.

Response

Addressed - See text revision below.

Text Revision

The QAPP has been completed revised to comply with the Region 1, EPA-New England QAPP Compendium of Quality Assurance Program Requirements and Guidance and will contain all required elements.

* * * * *

EPA Comment #2

2.) Just because the laboratory has not been chosen as yet does not mean that the field QC and the laboratory QC requirements should not be documented by BB&L in this document. Just stating that laboratory generated limits will be used when the laboratory is contracted, is not acceptable. Having a table with some QC criteria in another part of the document is also confusing. GE/BB&L must describe the DQOs and then describe the appropriate supporting measurement performance criteria (MPC) including the required project quantitation limits (PQLs) for this project that the laboratory will have to meet. When a laboratory is chosen then they will have to meet the MPCs, PQLs, and lab QA/QC set down in this document. The laboratory must not dictate to BB&L those requirements. Setting the site specific requirements is very important because the MPCs for field QC samples and the laboratory QC criteria will be the basis of validating the site data.

Response

Addressed - See text revision below.

Text Revision

The QAPP has been completed revised to comply with the Region 1, EPA-New England QAPP Compendium of Quality Assurance Program Requirements and Guidance and will contain all required elements.

* * * * *

EPA Comment #3

3.) The project quantitation limits (PQLs) for the designated COC do not support the Project Action Limits (PALs) for benzene,1,2-dichloroethane, trichloroethylene in water and benzo(a)pyrene and arsenic in soil. If the there is no better technology available to meet these criteria then that should be noted in a footnote. If the PQL could be lowered by an existing technology such as GC/MS SIM or ICP/MS, then it must be performed. Please combine all the PAL, PQL and MDL tables(Table 9-3 and Form 9a-1+9a-2) to combine all the COC and any other analyte that is being measured into one table. There does not seem to be a good reason for having two sets of tables. This would also cover the issue os *[sic]* treatability studies if and when they would be performed.

Response

As indicated in Table 5 of the Revised QAPP, the PQLs for benzene, 1,2-dichloroethane, and trichloroethylene are equal to the PALs (ICLs) for these constituents(i.e., 5 µg/L). Therefore, no change to the PQLs for these constituents is required. Similarly, the PQL for arsenic is well below the revised soil cleanup level for arsenic of 11 ppm (which is based on NH guidance on arsenic background level in soil).

With respect to benzo(a)pyrene, see EPA Comments #28 and #29 on the PD Work Plan. Also, the current PQL for benzo(a)pyrene (0.33 mg/kg) is only slightly higher than the PAL for this constituent of 0.2 mg/kg. However, since the method detection limit (MDL) for this constituent (0.045 mg/kg) is lower than the PAL, the analytical laboratory will be able to detect the presence of this constituent at estimated concentrations between 0.045 mg/kg and 0.33 mg/kg, despite not being able to quantify the exact concentration in this range. However, this level of quantitation is not required since GE will not be required to excavate benzo(a)pyrene except where collocated with PCBs in surface soils that contain PCBs at concentrations greater than the soil cleanup level of 1 ppm for surface soils.

Text Revision

None.

* * * * *

EPA Comment #4

4.) It should be noted that if Benzene is a COC and EnCore samplers are to be used, benzene, ethyl benzene, and toluene may degrade considerably in the first 48 hours after sampling even if stored at 4°C. It is

recommended that GE/BB&L use freezing as a preservative for soil samples placed in VOC vials to prevent loss of benzene during the holding time from the field collection to the laboratory analysis. The SOP on VOC sampling outlines four options but does not identify which will be used for this project. Please confirm which option will be used for this project and justify why that option is being used.

Response

Soil samples will be collected using EnCore™ samplers. BBL understands EPA's concern regarding degradation of certain volatile organic constituents. However, samples collected using Encore samplers are packed and sealed with zero headspace to minimize the potential for degradation of such constituents. Further, the laboratory will be instructed to preserve samples subject to volatiles analyses within 48 hours of sample collection. Given this sampling approach, the increased hazards associated with the handling and use of materials to freeze samples in the field (i.e., dry ice) represent an unnecessary risk to field sampling personnel.

Text Revision

Appendix D of the revised FSP has been revised to indicate that all volatile soil samples will be collected using EnCore™ samplers.

* * * * *

EPA Comment #5

5.) Validating only ten percent of the data at Tier II is not acceptable especially for confirmation of clean-up criteria in remediated areas. Having all the data in a CLP data package is a must, but not validating it is a problem. EPA believes that a higher percentage of samples need to be validated at Tier II and a small percentage of samples in remediated clean soils validated at Tier III to confirm that clean-up criteria has been met. The actual validation criteria that will be used during this project must be detailed in this document. Many of those QC criteria have not been documented anywhere in this document and will not until the laboratory is contracted.

Response

Addressed - See text revision below.

Text Revision

The QAPP has been completed revised to comply with the Region 1, EPA-New England QAPP Compendium of Quality Assurance Program Requirements and Guidance and will contain all required elements. Validation of soil samples will include only samples that are collected from depth intervals or locations not subject to excavation (i.e., delineation samples). The level of validation incorporated into the revised QAPP is as follows: Tier I 100%, Tier II 25%, Tier III 10%, as specified in Section 20.

* * * * *

EPA Comment #6

6.) There are redundant tables in the Table section and the Forms in QAPP appendices. One Form states that the QC criteria for the lab will come from the laboratory(Form 11) where another table(Table 9-5) gives QC

criteria but does not show the origin of the QC criteria or a justification for the criteria. MPC and laboratory QC criteria need to be documented separately. MPCs are defined for the overall project PARCCS (precision, accuracy, representativeness, completeness, comparability, and sensitivity) parameters whereas the Lab QC criteria are the QC criteria that the lab uses to stay in analytical control. There is a difference between these criteria when validation is performed and when the data user evaluates the data to see if it meets the requirements of the DQOs. Compiling the Forms and Tables into one cohesive document is a must.

Response

Addressed - See text revision below.

Text Revision

The QAPP has been completed revised to comply with the Region 1, EPA-New England QAPP Compendium of Quality Assurance Program Requirements and Guidance and will contain all required elements.

* * * * *

EPA Comment #77.) Tables and forms need to indicate what field QC samples will be used to measure accuracy and precision. Form 9b does not detail or even estimate how many samples will be colleted for each of the matrices. If the numbers have not been decided then this table should refer to a table that will be supplied in the FSP or some site specific work plan to be supplied later. Saying 1/20 is not acceptable to the EPA OEME QA Office. Specific numbers or at least approximations of the total numbers must be supplied when they become available.

Response

Addressed - See text revision below.

Text Revision

The QAPP has been completed revised to comply with the Region 1, EPA-New England QAPP Compendium of Quality Assurance Program Requirements and Guidance and will contain all required elements.

* * * * *

EPA Comment #8

8.) The laboratory has some low detection limits to meet in order to determine if there are risks. Some of those limit *[sic]* are not going to be met for Benzo(A)pyrene in soil and benzene and other volatiles in water. The laboratory may have to use a lower detection limit method for the volatiles or use selected ion monitoring (SIM) for the semivolatiles and selected volatile compounds. The QAPP does not take into account that there will be low percent solids in some of the soil samples that will drive up those detection limits and the non detects will be at a level that risk assessment will not be possible.

Response

Addressed - See Response to EPA Comment #3 above for a discussion regarding the PQLs and PALs for these constituents. The potential for low percent solids to further impact the detection limits for certain surface soil samples subject to analysis, is also addressed by the fact that GE will not be required to excavate benzo(a)pyrene except where collocated in surface soils that contain PCBs at concentrations greater than the soil cleanup level of 1 ppm for PCBs in surface soils.

Text Revision

None.

* * * * *

EPA Comment #9

9.) It is important that this QAPP document any changes that may be made in the FSP SOPs. For example, if the contractor is going to follow the "EPA Region1 Low Stress(Low Flow) Purging and Sampling Procedure" to the letter then that should be stated, and there is no need to make any changes noted, but if the contractor has made changes to the actual way the procedure is to be performed, then those changes need to be noted. EPA auditors who oversee low flow sampling always find that contractors make modifications that are not noted in the FSP or are approved by EPA. Measuring the groundwater parameters during purging is the area of most concern. An example of some problems found by EPA is the measurement of Turbidity. Turbidity must be measured outside the cell because many of the flow thru cell designs tend to collect particulate matter and measurement of turbidity in the cell will result in a falsely high turbidity measurement.

Response

GE's proposed Low Flow Purging and Sampling Procedure included as Appendix F of the revised FSP was developed in accordance with EPA's above-mentioned 1996 guidance document. However, based on experience derived from performing low-flow purging and sampling, certain minor modifications have been incorporated into the procedure included in Appendix F of the revised FSP. A brief summary of these modifications is provided below.

- Initial Pump Rate – EPA's SOP indicates that the pump should be started at the lowest setting and slowly increased until discharge occurs. GE's SOP indicates that pumping should be initiated at 200 to 500 milliliters per minute. This variation is not significant since both SOPs state that the pump rate should be adjusted with a goal of less than 0.3 feet of drawdown once discharge occurs.

- Stabilization of Field Parameters – EPA's SOP indicates that stabilization is considered to be achieved when turbidity is within 10 % for values greater than 1 NTU and dissolved oxygen values are within 10% over three consecutive readings. GE's SOP indicates that stabilization is considered to be achieved when turbidity is within 10 % for values greater than 10 NTU and within 1 NTU if the turbidity is less than 10 NTU. Similarly, for dissolved oxygen, stabilization is considered to be achieved when values are within 10% for values greater than 1.0 mg/l and within 0.1 mg/l if the dissolved oxygen reading is less than 1.0 mg/l (stabilization requirements for other parameters are identical between the two SOPs). Turbidity and dissolved oxygen are parameters that tend to decrease during purging, frequently approaching zero. Hence, GE's variation allows sampling to commence without undue delay once very low turbidity or

dissolved oxygen values are confirmed. Conversely, using a percentage-based criteria at very low values can be overly restrictive since very minor variations (e.g., a single instrument unit) may not meet the stabilization requirements (although no new information will be gained by additional purging).

- Measurement of Turbidity – EPA's SOP indicates that a flow through cell should be used for all measurements except turbidity. GE's SOP indicates that a flow through cell should be used for all measurements and that turbidity will be confirmed by using a separate turbidity meter. The GE SOP has been modified to indicate that turbidity measurements will be collected outside the flow through cell and that data from flow through cells equipped with turbidity meters within the cell will not be utilized.

- Sample Tubing Size – EPA's SOP recommends that ¼-inch or 3/8-inch inside diameter tubing be utilized. GE's SOP does not specify tubing size other than to use appropriate size for the pump being utilized. This variation is not significant since the tubing size is only a recommendation in the EPA SOP.

- Sample preservation – EPA's SOP states that pH of preserved samples should be checked to assure that proper pH modification has been achieved. Although GE's SOP does not address this issue, sample pH requirements are provided by the laboratory that supplies the sample containers.

- Sample filtering – EPA's SOP states that use of an in-line filter is required when filtered metals samples are collected. GE's SOP states that use of an in-line filter is required only if the sample cannot be transferred to the laboratory for filtering.

- Volume-Based Purging – EPA's SOP states that if a well is de-watered during low flow purging, samples should be collected once recovery is sufficient to collect the required samples. GE's SOP states that if a well is de-watered during low flow purging, samples should be collected once recovery is sufficient to collect the required samples, but also provides detailed methods for the sampling of wells where the low-flow method is not technically feasible, or where the well volume is not sufficient to collect all samples for analysis during a single sampling event. This volume-based sampling method provides procedures to address known "trouble wells" rather than making repeated failed efforts at low-flow sampling.

- Decontamination – EPA's SOP states that potable water/detergent solution/potable or deionized water/isopropyl alcohol/deionized water rinses should be made through the sampling pump. An alternate steam cleaning procedure is also presented. GE's SOP (Appendix S of the revised FSP) lists other solvents (i.e., hexane, methanol, and nitric acid) that may be utilized for sampling equipment, depending on the analyses being performed. Only a detergent solution and tap water rinse is prescribed for submersible pump decontamination.

Text Revision

None.

* * * * *

EPA Comment #10

10. General comment to Section 3 : Project Organization and Responsibility: Add roles and responsibilities of the USACE personnel as EPA's oversight for the RD/RA activities.

Response

Addressed - See text revision below.

Text Revision

Section 1 of the revised QAPP contains roles and responsibilities for USACE personnel as EPA's oversight for the RD/RA activities.

* * * * *

EPA Comment #11

11. Section 8.1, page 8-1 - Add sample identification codes for NAPL, waste, and air samples. Also, describe how field duplicate samples will be identified and kept blind to laboratory personnel.

Response

Addressed - See text revision below.

Text Revision

Section 9 of the revised QAPP and Appendix O of the revised FSP contain information regarding sample identification codes and include information regarding how duplicate samples will be kept blind to laboratory personnel.

* * * * *

EPA Comment #12

12. Section 9.1 page 9-1 - The definition of method detection limits (MDLs) described in the third paragraph is not consistent with the SW846 definition. MDLs are statistically determined using soil or water samples that undergo complete extraction and analysis.

Response

Addressed - See text revision below.

Text Revision

The QAPP has been completed revised to comply with the Region 1, EPA-New England QAPP Compendium of Quality Assurance Program Requirements and Guidance and will contain all required elements.

* * * * *

EPA Comment #13

13. Section 9.1, page 9-2 - Lower reporting limits for benzo(a)pyrene are achievable using a modified method 8270 with selected ion monitoring.

Response

Addressed - GE's Response to EPA Comment #3 above demonstrates that such additional measures are not required to achieve the objectives of the Pre-Design Investigation.

Text Revision

None.

* * * * *

EPA Comment #14

14. Section 10, General Comment - Consider analysis of performance evaluation samples (obtained from EPA or a commercial source) as a quality control element for this project.

Response

Addressed. Performance evaluation (PE) analyses are already a requirement of GE's laboratory accreditation process beyond this specific program. Therefore, the performance of PE samples will not be included in the revised QAPP.

Text Revision

Section 17 of the revised QAPP addresses the performance of PE samples.

* * * * *

EPA Comment #15

15. Section 11.2, page 11-3 - In the "Temperature Calibration" section, change "NBS" to "NIST".

Response

Addressed - See text revision below.

Text Revision

Section 13 of the revised QAPP has been revised to include the requested clarification.

* * * * *

EPA Comment #16

16. Section 11.3.2, page 11-7 - Explain the objective of the performance evaluation standard and how it differs from the continuing calibration check standard.

Response

The performance evaluation standard in this section is defined as decafluoro-triphenylphosphine (DFTPP). This compound is required to be analyzed resulting in a mass spectrum check which is evaluated against the criteria in Section 11.3.2. The difference between the performance evaluation standard and the continuing calibration standard will be clarified in the revised QAPP.

Text Revision

Section 11 of the revised QAPP has been revised to include the requested clarification.

* * * * *

EPA Comment #17

17. Form 9b - Consider adding PE samples to this table (see comment no. 14).

Response

See Response to EPA Comment #14 above.

Text Revision

Section 17 of the revised QAPP addresses the performance of PE samples.

* * * * *

EPA Comment #18

18. Forms 24a-1 and 24a-2 - For surrogates and internal standards, explain what is meant by a frequency of 2 per sample.

Response

Addressed - See text revision below.

Text Revision

Section 11 of the revised QAPP provides information regarding surrogates and internal standards.

* * * * *

EPA Comment #19

19. Form 29 - Add data validation elements as described in section 16.3.1.

Response

Addressed - See text revision below.

Text Revision

Section 20 and Table 19 of the revised QAPP provide information data validation elements.

ATTACHMENT A

RESPONSE TO FIELD SAMPLING PLAN COMMENTS

EPA Comment #1

1.) Section 2.6.2, page 2-6 - Explain the difference between the field equipment blanks and the rinsate blanks (section 2.6.3). Rinse blanks only are shown in Table 9-4. Please revise to be consistent.

Response

There is no real difference between field equipment blanks and rinsate blanks. The revised Field Sampling Plan (FSP) has been revised to reflect this clarification.

Text Revision

Former Sections 2.6.2 and 2.6.3 were combined to form the new *Section 2.6.2 Rinse Blanks*.

* * * * *

EPA Comment #2

2.) Section 2-7, page 2-7 - Instructions for collection of quality assurance (QA) split samples will be provided to BBL prior to initiation of sampling activities.

Response

Acknowledged.

Text Revision

None.

* * * * *

EPA Comment #3

3.) Appendix A/A-3/V - VOC samples should not be composited. Please revise.

Response

Addressed - See text revision below.

Text Revision

The reference to compositing of VOC samples was removed from Appendix A.

* * * * *

EPA Comment #4

4.) Appendix D/D-1/III - Add the statement that unpreserved VOC soil samples will be collected with no headspace.

Response

All VOC soil samples will be collected utilizing the EnCore™ sampling protocols.

Text Revision

References to non-EnCore™ VOC sampling methodologies were remove from Appendix D.

* * * * *

EPA Comment #5

5.) Appendix J, Sediment Sampling Procedures: The Pre-Design Work Plan does not indicate the sampling of sediment in accordance with the procedures outlined in this appendix. However, this information is useful and EPA has requested that GE consider adding in sediment sampling to begin to gather information related to the OU2 river contamination as well as to assist in documenting contamination at the rivers *[sic]* edge and provide information for sheet piling locations.

Response

This procedure was included for potential future investigations, if any, associated with the drainage ditch. See also Response to EPA Comment #4 on the Pre-Design Work Plan.

Text Revision

None.

* * * * *

EPA Comment #6

6.) Appendix N, Specific Capacity Testing Procedures: This appendix shall be revised according to comments referenced above about this testing procedure in the Pre-Design Work Plan section.

Response

See Response to EPA Comment #43 on the Pre-Design Work Plan.

Text Revision

None.

* * * * *

EPA Comment #7

7.) Appendix S, page S-4: Step 4 to the cleaning procedures has a note from BBL to GE asking if wipe testing will be required during the equipment cleaning. Please address.

Response

Addressed. Equipment cleaning is addressed in Section 3.7 of the revised SMP.

Text Revision

The referenced note was removed from the SOP.

* * * * *

EPA Comment #8

8.) Appendix T, page T-3: GE shall specify to the EPA, which monitoring wells it believes should be replaced or decommissioned as a result of the well survey, prior to taking such action.

Response

Addressed. The results of the monitoring well survey proposed in Phase I of the Pre-Design Work Plan and the subsequent need for monitoring well replacement/decommission activities will be provided to EPA/NHDES.

Text Revision

None.

ATTACHMENT A

RESPONSE TO COMMUNITY RELATIONS SUPPORT PLAN COMMENTS

EPA Comment #1

1) Site History - Elm Street: The Korean War Memorial cleanup occurred in 1996.

Response

Addressed - See text revision below.

Text Revision

Section 2.2.1 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #2

2) Site History - Mill Street: The 1995 residential cleanup was not performed voluntarily by GE, but rather through an Order issued by the EPA.

Response

Addressed - See text revision below.

Text Revision

Section 2.2.2 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #3

3) Public Notification - EPA typically releases public notices about 2-3 weeks prior to a major public meeting.

Response

Addressed - See text revision below.

Text Revision

Section 3.2.1 has been revised to reflect this requested clarification.

EPA Comment #4

4) 3.3 Contact information: please add Tom Andrews, the NHDES project manager to this list. A Town contact should also be included.

Response

Addressed - See text revision below.

Text Revision

Section 3.3 has been revised to include Tom Andrews, NHDES as well as Katie Chambers, Town of Milford.

ATTACHMENT A

RESPONSE TO WATER MONTORING PLAN COMMENTS

EPA Comment

General Comment: There are many areas of this document which are copied from the Pre0design *[sic]* Workplan. The comments on th *[sic]* Pre-Design Workplan therefore also apply to the same text included in this report.

Response

Addressed - See text revision below.

Text Revision

The text of this document has been revised to be consistent with the responses to comments on the Pre-Design Work Plan (PDWP).

* * * * *

EPA Comment #1

1.) Section 2.2: Site History page 2-3: The building demolition action was not a removal action but the initiation of the remedial aetion.

Response

Addressed - See text revision below.

Text Revision

Section 2.2 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #2

2). Section 2.3, Mill Street area: GE did not voluntarily conduct the residential cleanup action, EPA issued an Order to GE for the removal action.

Response

Addressed - See text revision below.

Text Revision

Section 2.3 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #3

3). Section 4.1.1, Overburden: The thickest part of the overburden is in the Keyes Field/Elm Street area, not near the Mill Street area.

Response

Addressed - See text revision below.

Text Revision

The parenthetical reference to Mill Street will be removed from Section 4.1.1.

* * * * *

EPA Comment #4

4.) Section 4.4.2 Souhegan River Surface Water Quality: Add the Phase 1A results to this discussion.

Response

Addressed - See text revision below.

Text Revision

Available and applicable Phase 1A results will be added to the discussion in Section 4.4.2.

* * * * *

EPA Comment #5

5.) Section 4.5.2 Initial Horizontal and vertical GMZ Boundaries: In reading this discussion and looking at Figure 5: how does the Keyes Field Area fit into the GMZ boundaries? The USGS study (pump test at keyes well) indicates that the Mill Street contamination, during the period that the Keyes Well would have been in use, would circle toward Hampshire Paper and into the Keyes Field. Early well sampling indicates some Fletcher's type constituents in the Keyes Well area, though this was masked over time with the significant gasoline product that infiltrated into the field. MW18 is the westernmost well at the site in the Elm Street area, but microwells used in Phase II of the RI indicated that contamination existed beyond that boundary at the easternside of the Keyes Field . This plan does not include any additional monitoring wells to address this area.

Response

There are several reasons why the Keyes Field Area was not included in the initial GMZ boundaries presented in the Surface Water and Groundwater Monitoring Plan (SWGWMP). First, the former Keyes Well is part of OU-2, and extends beyond the scope of OU1 that is the subject of the EPA administrative order. Second, the most recent EPA groundwater sampling data (Phase 1B, October 1993) indicated that no organic constituents (PCBs, VOC, SVOCs) were detected in MW-5A, B or MW-11A, B which lie between the Site and the Keyes Well. Third, as stated in Section 4.5.1 of the SWGWMP, the GMZ boundaries, as currently shown, are subject to modification as both monitoring and remedial activities for the Site are executed and more current data are obtained. This provides the necessary flexibility depending upon the ongoing data collection under OU1. And fourth, though not directly related to EPA's question, the Town of Milford previously indicated in its comments to EPA on this submittal, that it is the Town's preference that the GMZ be as small as reasonably supported by the data (see Letter from L. Mayhew C. Sprague dated February 28, 2002). In light of the above, no additional monitoring wells are proposed at this time nor are any adjustments to the GMZ boundaries proposed at this time.

Text Revision

None.

* * * * *

EPA Comment #6

6.) Section 5.1 Monitoring Requirements: Please refer to EPA's comments to the PDI Work Plan regarding frequency of water level measurements.

Response

To address the seasonal variability of water table elevations, GE proposes to expand the monthly groundwater elevation monitoring for a period of 12 months. The monitoring program will include the new wells to be installed as part of Phase II (as discussed in Section 4.4.2.2 of the PDWP and our response to EPA Comment 31a) for at least a six-month period during the Pre-Design activities, and will continue for an additional period beyond the submission of the Pre-Design Report until 12 months of data are collected.

Text Revision

Section 5.1 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #7

7.) Section 5.3.5 Analytic Parameters. While the ROD set cleanup levels for certain compounds that exceeded a drinking water standard at the time of the ROD, an ARAR that must be met is compliance with drinking water standards. For this site, there may be degradation products of the ICL compounds, as well as not related compounds (gasoline products) which would need to *[sic]* understood to determine compliance with the GMZ requirements. Any degradation product would be required to be at drinking water levels at the end of the

action. Please include a proposed schedule to include full TCL/TAL analysis into the sampling schedule (e.g. one full round of analysis every year/ every other year, etc).

Response

The groundwater monitoring program will be modified to include one round of TCL/TAL analyses in the first year of monitoring, and then one round every other year thereafter. Consistent with the approach presented in Section 5.3.5, the scope of this aspect of the groundwater monitoring program will be continually reviewed and modified based on the TCL/TAL data.

Text Revision

Section 5.3.5 has been revised to reflect this requested clarification.

* * * * *

EPA Comment #8

8.) Section 5.3.6 Sampling Methods: Why does is *[sic]* state that the EPA low Flow procedures will generally be followed. Any modification the EPA's procedure shall be documented in the QAPP for EPA review and approval.

Response

Addressed - See text revision below.

Text Revision

Section 5.3.6 has been revised to indicate that low-flow sampling will be performed in accordance with the procedures presented in Appendix F of the FSP, which was developed in accordance with EPA's July 30, 1996 guidance document titled *Low Stress (low flow) Purging and Sampling Procedure for the Collection of Ground Water Samples from Monitoring Wells.*

* * * * *

EPA Comment #9

9.) Section 6.2 Water Monitoring Reports: Any compound which exceeds a drinking water standard shall be presented in the water monitoring reports.

Response

Addressed - See text revision below.

Text Revision

Section 6.2 has been revised to reflect this requested clarification.

Draft for EPA Review

EPA Letter Authorizing Initiation of Phase 2 Pre-Design Investigation Activities dated October 24, 2003

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

October 24, 2003

Mr. Lewis Streeter
General Electric Company
320 Great Oaks Office Park
Suite 323
Albany, NY 12203

Re: GE PDI Schedule

Dear Mr. Streeter:

EPA is reviewing the GE responses and the revised Pre-Design Workplans as well as the GE response letters to the EPA comments. Several telephone conference calls and submittals have also occurred with respect to issues related to the finalization of the Quality Assurance Plan. EPA has not completed the response letter granting the approval of these plans, but expects to release the letter, the week of October 27th. The EPA comment letter will grant GE an approval of the PDI Workplans with incorporation of the remaining comments. A conference call between EPA and GE should resolve these last issues which are specific to the workplan. EPA has no additional comments on the QAPP, and therefore GE may finalize this plan.

In accordance with the Order, EPA therefore directs GE to begin the initiation of the Phase II field work, which is expected to take several months to complete, while the finalization of the Work Plan occurs.

EPA anticipates that GE will need to line up the necessary personnel and contractors to perform this work, and in the meantime requests that GE set up the meeting with the Town of Milford, New Hampshire and the School Superintendent to review the upcoming activities and any impacts on the community and local schools.

Please call me if you have any questions,

Cheryl L. Sprague
Remedial Project Manager
Office of Site Remediation and Restoration

cc: Scott Acone

Draft for EPA Review

EPA Final Comments to PD Work Plan and POP dated November 5, 2003

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engineers, scientists, economists

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

November 5, 2003

Mr. Lewis Streeter
General Electric Company
320 Great Oaks Office Park
Suite 323
Albany, NY 12203

Re: GE response to comments letter and revised Pre-Design Work Plan and POP.

Dear Mr. Streeter:

EPA has reviewed the GE responses and the revised Pre-Design Workplan and POP, including the GE response letters to the EPA comments. In addition, several telephone conference calls have been held with respect to on-going issues related to the finalization of the Quality Assurance Plan. EPA directed GE to begin the activities that will be conducted as part of Phase II in a letter dated October 24, 2003. This letter hereby grants EPA approval of the Pre-Design Investigation Workplan, and related Project Operation Plans, with modification of those plans through the incorporation of the enclosed comments. This approval is granted in accordance with the UAO, Section XIV, EPA Review of Submissions, which states that after review of any deliverable, plan, report or other item which is required to be submitted for review and approval pursuant to this Order, EPA, after review and comment by the State, may approve the submission with modifications. In accordance with an approval with modifications by EPA, GE shall proceed to take any action required by the plan, report, or other item, as approved or modified by EPA.

In accordance with the Order and upon approval of the Pre-Design Work Plan by EPA, GE shall, within 15 days, implement the remaining Pre-Design Work Plan tasks according to the schedule in the approved Pre-Design Work Plan, as modified by EPA. Any violation of the approved Pre-Design Work Plan shall be a violation of the Order.

Currently the Order requires that within one hundred twenty (120) days after the date of EPA approval or modification of the Pre-Design Work Plan, the Respondent shall submit a Pre-Design Report for review and approval by the EPA, after reasonable opportunity for review and comment by the State. The Pre-Design Report shall set forth in detail the results of the Work performed under the approved Pre-Design Work Plan. The Pre-Design Report is due 120 days from November 5, 2003,or therefore due to the EPA on March 4, 2004.

If you have any questions regarding this approval or the modifications requested, please call me at 617/918-1244.

I look forward to talking with you on November 7th in Milford, New Hampshire.

Sincerely,

Cheryl L. Sprague

Cheryl L. Sprague
Remedial Project Manager
Office of Site Restoration and Remediation

cc: Scott Acone, COE
Mike Jasinski, EPA
Tom Andrews, NHDES
Bonnie Harrington, GE
John Beling, EPA
Corey Averhill, BBL
Katie Chambers, Milford

EPA response to GE "Response to comments letter":

GE response to EPA's comment #4, page 2 of 26: The EPA has tasked the US ACE to perform the sediment sampling within the Souhegan River and will move forward with OU2 following review of that data. EPA often operates several operable units at one time without the delay of any work. The EPA only separated the river from the Fletcher properties in the first operable unit ROD because of a delay in obtaining the fish data from the lab. EPA had originally hoped that by separating the two areas, the former Fletcher properties could be moved into cleanup faster. EPA believes that coordinating any potential River action with the OU1 action is entirely appropriate and will proceed with the data collection and alternative considerations.

GE response to EPA's comment #32e, page 9 of 26:

EPA's original comment asked what activities will be conducted *during* soil boring activities to ensure stability of the granite walls surrounding the cemetery. GE's response, while it includes the actions of an engineering review and photo documentation prior to any action and the keeping of the soil berm in place for additional support, does not provide for continuous inspections, etc that should be performed, especially with the drilling of the soil borings adjacent to the wall itself or the former Fletcher building foundation. A process shall be in place that allows the action to be terminated immediately and response action taken should any shifting of the wall or ground behind the wall be found.

GE response to EPA's comment #34, page 10 of 26:

See comments below to Appendix E.

GE response to EPA's comment #37, page 13 of 26:

GE has indicated that three test pits will occur on both the Elm and Mill Street properties. The Elm Street test pit designations of the "hot spot" area is in the EB-O3 area. The drilling logs for EB03 a and B reportedly went through the hot spot stain-like material. The landfill is at various depths through the Elm Street area. GE may want to consider performing four of the test pits at the Elm Street location (since the Mill Street site did not have much variation across the site). Further, GE may want a test pit beneath the former Fletcher building (warehouse portion) as well as other locations throughout. The portion beneath the warehouse was originally a trench that channeled storm water, was filled in over time, then re-dug for the warehouse and as a result is the most disturbed portion of the site. The other area GE may wish to perform a test pit would be on the Fletcher property in a path paralleling the Keyes Drive, since a large quantity of drums were stored in this location over time.

GE response to EPA's comment #44, page 17 of 26:

GE's response incorrectly captured EPA's position relative to the measure of soil-water partitioning at the Mill Street are of the site. Specifically, GE states that EPA had agreed that the down gradient water quality to be measured in the proposed monitoring wells north of the Mill Street area, would determine the soil-water partitioning due to co-solvency, flocculent or any combination. While EPA agrees that we resolved to tackle the technical issue once additional data was gathered, EPA has never held the position that data from the down gradient wells would be sufficient to determine the soil-water partitioning occurring within the Mill Street area. Hydrological/geological effects, weathering, type of arochlor, other constituents, etc. will all also play a part in making the partitioning of the PCBs at the Mill Street site unique. Since GE only anticipates taking PCB arochlor analysis of the groundwater samples from the down gradient monitoring wells, the effects from weathering, and the ability to see "expected", more mobile congeners down gradient would not be able to be evaluated.

The EPA does plan on having the US ACE collect groundwater splits for congener analysis. Additionally, EPA is more likely to believe that the flocculent materials would decrease the mobility of the PCBs in the subsurface, unless the flocculent materials are found moving throughout the system.

GE's response, part c: The floc material was only found on the Mill Street site. The shed building had either a wood floor or dirt floor, depending on which portion one was in. Many of the drums were in various stages of decay when EPA conducted the 1993 removal action. To the best of my knowledge no floor drains, french drains or septic systems have ever been constructed on this property. Leaking drums, improper storage of materials and disposal of materials on the ground were actions reported as occurring within the property. While GE continually references floc materials found at MW21, the majority of the floc and the consistent finding and formulation of the floc appears more to center at the MW-07 water table well.

The last part of the GE response (part e) to EPA's comment states that GE will consider performing the soil column study after review of two factors: the extent of PCB contaminated soils greater than 1 ppm PCB, and the second being the concentration of PCBs detected in the down gradient groundwater. The GMZ regulations will require that the groundwater directly beneath the site meet drinking water standards (not the edge of the property as is the case with landfills). To that end, GE must evaluate not solely whether the PCBs could leach from soils left in place and move beyond the site above drinking water standards, but whether the groundwater directly below the contamination left in place would meet drinking water standards. I bring this up to simply reiterate discussions held over many months between GE, EPA and the State in years past.

Section 4.5.4 Soil Column Study, page 4-30 states that if GE plans on performing the soil column study that you will do so on a separate track and modify the design to reflect the alternative cleanup level. The UAO states that the determination of a subsurface soil cleanup

level other than 1 mg/kg PCB, will be in the sole discretion of the EPA. The UAO-SOW states in **Section B Pre-Design Phase: (iii) Evaluation of Soil Performance Standards:** " If the Respondent chooses to undertake a study to review a site specific PCB cleanup level for those soils outlined in Section X of the ROD that require cleanup to prevent the future leaching of contamination into the groundwater in excess of the PCB MCL (0.5 ug/l), then the Respondent shall discuss and identify what steps they shall take to review such performance standards, and upon EPA approval or modification, after reasonable opportunity for review and comment by NHDES, shall undertake such study. The Respondent shall undertake and complete such studies during the time frame of the Pre-Design Phase and submit such findings and recommendations to the EPA and NHDES in the Pre-Design Report, for review, approval or modification." EPA has not granted any modification to Order regarding the schedule for the submittal of an alternative cleanup level in any other format other than the Pre-Design Report.

The September 30, 1998 ROD also states "If changes are made to the Mill Street Site subsurface soil concentration in the future, the Draper Energy subsurface soil concentrations, currently set at 1 mg/kg PCB, would also have to be revisited to ensure that subsurface soils at the property would remain protective for future adult and child exposures. The determination of a subsurface soil concentration at the Mill Street Site, as well as any revisited cleanup level at the Draper Energy property, other than the 1 mg/kg PCB set in this ROD, will be in the sole discretion of the EPA."

GE response to EPA's comment #45a, page 19 of 26:

GE has proposed that the groundwater treatability testing be performed on the following wells, MW-3B and MW-26 a for the Elm Street area and MW-7A and MW-22 A at the Mill Street area. While MW03 be seems justifiable given that it contains BTEX compounds not found in the other wells, EPA questions the selection of MW-26A (no justification was given) which will be located at the back, middle portion of the site. EPA suggests that MW-29B may be a better choice in that it is located nearest, and just downgradiant of the EB-15 hotspot. EPA suggests MW-29B given expected consideration that the chlorinated content of the groundwater is more likely to be an issue with any discharges to a POTW, etc. in Milford, NH.

GE response to EPA's comment #48b, page 21 of 26:

GE did not change the plan to address further characterization of the EB-15 and EB-03 areas. EPA does not believe that the step in/step out sampling process described in the plan addresses the concerns EPA has expressed, because in GE's process stepping in requires first that a sample is below cleanup levels. EPA's comment is that there are two known areas of significant contamination. If a boring is placed at O-14 (the closest to EB-15), the next data point is O-16, which is located 50 feet away, and in an area under the former building and in an area known to have been disturbed. Therefore there may not be any possible correlation between the depth or concentrations of the contamination found at O-14 and those found at 0-16. GE may not be able to infer an excavation depth between these two points based on the location of these borings,

without taking either additional borings or additional sampling during the actual excavation activity. This is further troublesome to the EPA as EB-15 represents the deepest contamination found at the Elm Street area. EPA therefore reserves the right to review the boring data and require GE to perform additional borings and collect additional data upon review of the Phase II grid sampling.

GE response to EPA's comment #52, page 25f 26:

EPA understands therefore that GE will be performing the congener and arochlor data from the soil column study.

Additional EPA comments on the Draft GE FSP:

Figure 7b: Estimated Schedule for Pre-Design - Phase II and submittal of the Pre-Design Report.

The current schedule cannot be accepted by the EPA as it will place GE in noncompliance with the Order as it does not allow for the completion of the pre-design studies nor the pre-design report to be submitted within the 120 days required in the Order from the date of the approval of the work plan.

Mill Street, Section 4.5.3.2, page 4-27: Why are the Mill Street down gradient monitoring wells going to have five foot screens while the rest have 10 foot screens? Why does the procedures listed for split spoon reference 3 split spoon samples for all of the overburden wells , corresponding to the 6 foot depth interval centered at the same depth as the five foot well screen, when according to the previous text, only the down gradient wells have five foot screens and the rest 10 foot screens?

Appendix A - Soil Boring Installation and Soil Sampling Procedures

Section III is written with no clear hierarchy for the use of hollow-stem augers vs driven casing. It is EPA's understanding that GE/BBL will initiate first an attempt to use hollow stem augering prior to going to a drive and wash method (not withstanding separate protocols regarding DNAPL issues). It is also not clear when direct push techniques will be used.

Appendix E - Monitoring Well Installation and Development Procedures:

Section III Procedures: No hierarchy for techniques have been presented.

Section III, step 2 - If the ASTM D- 1586 method is not to be followed, what is the alternative?

Section III, step 3 - In what circumstance would you expect not to install a 2 inch diameter, flush-threaded PVC slotted well screen?

Section IV - procedures for NAPL well installation - The description presented does not select a preferred method for installation of the boring. Section VII should be referenced or incorporated.

Section IV step 2 - the SOP for the jar shake test should be referenced.

Section V - Procedures for Direct Push - no conditions listed as to when this method would be most appropriate to use in the field. The top of E-6 indicates language for a DNAPL bedrock well and belongs in another section.

Section XI - A. Procedures for monitoring well development - the equipment to be utilized shall be presented in order of preferred use or by conditions warranting use. What if the well never stabilizes below 50 NTU's?

Section XI - B. Materials for monitoring well development - No specific pump type is provided for in the materials. Under what conditions would you expect to use a bailer to develop the well.

Section XI - C. Page E-9 - remove all language relative to bailing within the description of the process for use of a pump.

Draft for EPA Review

EPA Letter Approving Revised PD Work Plan Schedule received via e-mail dated November 26, 2003

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BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

November 26, 2003

Mr. Lewis Streeter
General Electric Company
320 Great Oaks Office Park
Suite 323
Albany, NY 12203

Re: Schedule for Phase II Activities and the Pre-Design Report Submittal

Dear Mr. Streeter:

EPA's November 5th, 2003 letter to GE granted approval of the Pre-Design Investigation (PDI) Work Plans with incorporation of the remaining EPA comments, but determined that the Schedule for the PDI work and submission of the PDI Report, as presented in the draft report, would not meet the requirements under the Order, nor could EPA grant approval of an alternative schedule as none was presented which gave a defined amount of time for completion of the Work and presented a date for completion.

Per EPA and GE's recent discussions, GE presented EPA with an alternative schedule on November 17th which included a break in the schedule for winter weather and a submission date of June 30, 2004.

EPA will accept that the winter break can occur in the field schedule in the event of inclement weather such that conditions present hazard to the on-site workers or such that continuous snow removal, de-icing, etc. conditions exists to prevent successful and continuous action in the field. GE shall confer with EPA and State on the existing conditions, prior to taking any such winter break. However, as EPA and GE have discussed, prior to taking a winter break in the field action, GE must complete at a minimum, the remainder of the field surveys, the installation and development of the groundwater monitoring wells, the taking of one round of groundwater samples from the monitoring well network as presented in the approved work plans (including any floc samples) and the installation and soil sampling as part of the Mill Street soil boring program. Should a break in the schedule be agreed upon due to inclement weather conditions, GE shall return to the field work on March 1, 2004 and be active in field within 15 days.

With a break in the schedule the "spring" field actions would include the remainder of the Phase II activities mostly focused on the Elm Street areas. As a note, the Town would like advance notice of the Elm Street test pit activities so as to have their own representative performing oversight.

EPA is concerned about the soil samples that were staked along the rivers edge during Phase I of the PDI. As seen on November 7th during the site walkover, some of these stakes are now under water since the River has risen. Since these samples where considered soil samples, and within the designation of the OU1 area at the time they were surveyed in, EPA believes these samples should represent the low surface water table for the purposes of defining the line between the OU1 soils and the OU2 sediments and therefore shall be sampled by GE as part of the Phase II activities. This may mean an alternative approach to sampling these locations as was previously determined, and may also warrant that these samples be collected prior to the river freezing over. I would like to discuss this further on December 1st at the kick-off meeting at the site in Milford, NH.

EPA's comments on this revised schedule as was submitted on November 17th are as follows:

A note shall be added which states the winter break schedule is being tentatively scheduled, will be based on inclement weather conditions, and that field work will commence again on March 1, 2004.

A note shall be added which indicates that the soils column study may or may not be performed as part of the PDI Work..

State that the Pre-Design Report is due to the EPA on June 30, 2004.

If you have any questions regarding the contents of this letter , please call me at 617/918-1244.

I look forward to the Phase II kick-off on December 1st in Milford, New Hampshire.

Sincerely,

Cheryl L. Sprague
Remedial Project Manager
Office of Site Restoration and Remediation

cc: Scott Acone, COE
Mike Jasinski, EPA
Tom Andrews, NHDES
Bonnie Harrington, GE
John Beling, EPA
Corey Averhill, BBL
Katie Chambers, Milford

Draft for EPA Review

GE Response to EPA November 5, 2003 Comments on PD Work Plan and POP

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RESPONSE TO EPA COMMENTS ON PRE-DESIGN WORK PLAN DATED NOVEMBER 5, 2003

EPA Comment #1: *GE response to EPA's comment #4, page 2 of 26: The EPA has tasked the US ACE to perform the sediment sampling within the Souhegan River and will move forward with OU2 following review of that data. EPA often operates several operable units at one time without the delay of any work. The EPA only separated the river from the Fletcher properties in the first operable unit ROD because of a delay in obtaining the fish data from the lab. EPA had originally hoped that by separating the two areas, the former Fletcher properties could be moved into cleanup faster. EPA believes that coordinating any potential River action with the OU1 action is entirely appropriate and will proceed with the data collection and alternative considerations.*

Response: Acknowledged. No changes to the Pre-Design Work Plan are proposed in response to this comment.

Text Revision: None.

* * * * *

EPA Comment #2: *GE response to EPA's comment #32e, page 9 of 26: EPA's original comment asked what activities will be conducted during soil boring activities to ensure stability of the granite walls surrounding the cemetery. GE's response, while it includes the actions of an engineering review and photo documentation prior to any action and the keeping of the soil berm in place for additional support, does not provide for continuous inspections, etc. that should be performed, especially with the drilling of the soil borings adjacent to the wall itself or the former Fletcher building foundation. A process shall be in place that allows the action to be terminated immediately and response action taken should any shifting of the wall or ground behind the wall be found.*

Response: The subsurface soil investigation activities proposed in the vicinity of the granite walls surrounding the cemetery will be conducted using direct-push sample collection equipment, which will present substantially less vibration than collection of soil samples using hollow stem augers. Further, the soil berm placed along the granite walls by EPA for additional support following the building demolition activities at the Elm Street Site, will be maintained during the performance of the soil investigations proposed in the Pre-Design Work Plan. Specifically, field personnel will only remove the portion of the soil berm necessary to perform sample collection activities and will restore such soil following sample collection. Finally, field personnel will continuously monitor the visible portions of the granite walls and the adjacent soil berm(s) for any signs of displacement during investigation activities. If such displacement is identified, sample collection activities will be immediately suspended until further structural support measures are implemented for the granite walls.

Text Revision: Section 4.5.1.1 - Elm Street Area, Methodologies/Procedures, 2nd Paragraph has been revised to include the following: *As a precautionary measure, field personnel will only remove the portion of the soil berm necessary to perform the sample collection activities and will restore such soil following sample collection. Finally, field personnel will continuously monitor the visible portions of the granite walls and the adjacent soil berm(s) for any signs of displacement during investigation activities. If such displacement is identified, sample collection activities will be immediately suspended until further structural support measures are implemented for the granite walls.*

* * * * *

EPA Comment #3: *GE response to EPA's comment #34, page 10 of 26: See comments below to Appendix E.*

Response: Acknowledged. No changes to the Pre-Design Work Plan are proposed in response to this comment.

Text Revision: None. Revisions to Appendix E of the Field Sampling Plan are covered in that document.

* * * * *

EPA Comment #4: *GE response to EPA's comment #37, page 13 of 26: GE has indicated that three test pits will occur on both the Elm and Mill Street properties. The Elm Street test pit designations of the "hot spot" area is [sic] in the EB-O3 area. The drilling logs for EB03 a [sic] and B reportedly went through the hot spot stain-like material. The landfill is at various depths through the Elm Street area. GE may want to consider performing four of the test pits at the Elm Street location (since the Mill Street site did not have much variation across the site). Further, GE may want a test pit beneath the former Fletcher building (warehouse portion) as well as other locations throughout. The portion beneath the warehouse was originally a trench that channeled storm water, was filled in over time, then re-dug for the warehouse and as a result is the most disturbed portion of the site. The other area GE may wish to perform a test pit would be on the Fletcher property in a path paralleling the Keyes Drive, since a large quantity of drums were [sic] stored in this location over time.*

Response: Acknowledged. No changes to the Pre-Design Work Plan are proposed in response to this comment.

Text Revision: None.

* * * * *

EPA Comment #5: *GE response to EPA's comment #44, page 17 of 26: GE's response incorrectly captured EPA's position relative to the measure of soil-water partitioning at the Mill Street are [sic] of the site. Specifically, GE states that EPA had agreed that the down gradient water quality to be measured in the proposed monitoring wells north of the Mill Street area, would determine the soil-water partitioning due to co-solvency, flocculent or any combination. While EPA agrees that we resolved to tackle the technical issue once additional data was gathered, EPA has never held the position that data from the down gradient wells would be sufficient to determine the soil-water partitioning occurring within the Mill Street area. Hydrological/geological effects, weathering, type of arochlor [sic], other constituents, etc. will all also play a part in making the partitioning of the PCBs at the Mill Street site unique. Since GE only anticipates taking PCB arochlor [sic] analysis of the groundwater samples from the down gradient monitoring wells, the effects from weathering, and the ability to see "expected", more mobile congeners down gradient would not be able to be evaluated.*

The EPA does plan on having the US ACE collect groundwater splits for congener analysis. Additionally, EPA is more likely to believe that the flocculent materials would decrease the mobility of the PCBs in the subsurface, unless the flocculent materials are found moving throughout the system.

GE's response, part c: The floc material was only found on the Mill Street site. The shed building had either a wood floor or dirt floor, depending on which portion one was in. Many of the drums were in various stages of decay when EPA conducted the 1993 removal action. To the best of my knowledge no floor drains, french drains or septic systems have ever been constructed on this property. Leaking drums, improper storage of materials and disposal of materials on the ground were actions reported as occurring within the property. While GE continually references floc materials found at MW21, the majority of the floc and the consistent finding and formulation of the floc appears more to center at the MW-07 water table well.

The last part of the GE response (part e) to EPA's comment states that GE will consider performing the soil column study after review of two factors: the extent of PCB contaminated soils greater than 1 ppm PCB, and the second being the concentration of PCBs detected in the down gradient groundwater. The GMZ regulations will require that the groundwater directly beneath the site meet drinking water standards (not the edge of the property as is the case with landfills). To that end, GE must evaluate not solely whether the PCBs could leach from soils left in place and move beyond the site above drinking water standards, but whether the groundwater directly below the contamination left in place would meet drinking water standards. I bring this up to simply reiterate discussions held over many months between GE, EPA and the State in years past.

Section 4.5.4 Soil Column Study, page 4-30 states that if GE plans on performing the soil column study that you will do so on a separate track and modify the design to reflect the alternative cleanup level. The UAO states that the determination of a subsurface soil cleanup level other than 1 mg/kg PCB, will be in the sole discretion of the EPA. The UAO-SOW states in ***Section B Pre-Design Phase: (iii) Evaluation of Soil Performance Standards:*** *" If the Respondent chooses to undertake a study to review a site specific PCB cleanup level for those soils outlined in Section X of the ROD that require cleanup to prevent the future leaching of contamination into the groundwater in excess of the PCB MCL (0.5 ug/l), then the Respondent shall discuss and identify what steps they shall take to review such performance standards, and upon EPA approval or modification, after reasonable opportunity for review and comment by NHDES, shall undertake such study. The Respondent shall undertake and complete such studies during the time frame of the Pre-Design Phase and submit such findings and recommendations to the EPA and NHDES in the Pre-Design Report, for review, approval or modification." EPA has not granted any modification to Order regarding the schedule for the submittal of an alternative cleanup level in any other format other than the Pre-Design Report.*

The September 30, 1998 ROD also states "If changes are made to the Mill Street Site subsurface soil concentration in the future, the Draper Energy subsurface soil concentrations, currently set at 1 mg/kg PCB, would also have to be revisited to ensure that subsurface soils at the property would remain protective for future adult and child exposures. The determination of a subsurface soil concentration at the Mill Street Site, as well as any revisited cleanup level at the Draper Energy property, other than the 1 mg/kg PCB set in this ROD, will be in the sole discretion of the EPA."

Response: As indicated in GE's July 18, 2003 response to comments letter (Attachment A of the Revised Draft Pre-Design Work Plan), if GE performs the soil column study, it is planned that such a study will be performed on a parallel track as the remainder of the investigation activities proposed in the PDWP and the results of such a study would be submitted to EPA in a Pre-Design Report Addendum. Such an approach is necessary for the following reasons.

- GE needs to sequentially perform certain of the pre-design investigation activities proposed in the PDWP prior to the initiation of the soil column study. GE will utilize the results of the soil boring program at the Mill Street combined with the results of the first groundwater monitoring event to determine the location(s) from which samples will be collected for the soil column study. Specifically, an evaluation of the above activities will first assist GE in determining the need and viability of the soil column study. Secondly, if it is determined that the soil column study is to be performed, the data will be necessary to identify the location with the highest combination of PCBs and chlorinated organics from which samples will be collected during the subsequent test pitting operations. This approach is consistent with the first part of EPA's response to comment (presented above), which indicates that EPA and GE agreed to tackle the technical issue of soil/water partitioning due to co-solvency once additional data had been collected.

- GE is proposing to implement the soil investigations at the Mill Street Site, the monitoring well installation and first round of groundwater sampling activities prior to an anticipated shutdown due to winter weather conditions. The shutdown due to winter weather will allow GE to review the soil and groundwater investigation data, provide this data to the EPA, and identify and propose the location(s) from which GE

will collect samples for the soil column study (if performed). The EPA can then approve these sampling locations. Such an approach would ensure that the locations and depths selected for sample collection would represent the maximum observed concentrations of PCB and chlorinated organics constituents, which would allow GE to measure the maximum soil/water partitioning coefficient expected to be encountered at the Mill Street Site.

- EPA has indicated that they have not yet completed their review of the Soil Column Study Work Plan included in Attachment B of the PDWP. GE needs to have an approved soil/column study prior to initiating the study.

- Finally, the schedule provided in Attachment B of the PDWP indicates that the soil column study, if performed, would require 6 months to perform.

Therefore, consistent with our previously proposed schedule for this project, GE proposes to complete the soil/column study during the time frame of the pre-design phase, on a parallel track to the remainder of the pre-design investigations, providing the results to EPA as part of the Addendum to the Pre-Design Report.

Text Revision: None.

* * * * *

EPA Comment #6: *GE response to EPA's comment #45a, page 19 of 26: GE has proposed that the groundwater treatability testing be performed on the following wells, MW-3B and MW-26[sic]a for the Elm Street area and MW-7A and MW-22 A at the Mill Street area. While MW03 be [sic] seems justifiable given that it contains BTEX compounds not found in the other wells, EPA questions the selection of MW-26 [sic]A (no justification was given) which will be located at the back, middle portion of the site. EPA suggests that MW-29B may be a better choice in that it is located nearest, and just downgradiant of the EB-15 hotspot. EPA suggests MW-29B [sic] given expected consideration that the chlorinated content of the groundwater is more likely to be an issue with any discharges to a POTW, etc. in Milford, NH.*

Response: Samples will be collected from MW-29B as part of the Phase 2 pre-design investigation activities and included in the proposed groundwater treatability testing activities.

Text Revision: Section 4.5.6 - Groundwater Treatability Testing, Proposed Activities, 1st Paragraph, has been revised to include MW-29B.

* * * * *

EPA Comment #7: *GE response to EPA's comment #48b, page 21 of 26: GE did not change the plan to address further characterization of the EB-15 and EB-03 areas. EPA does not believe that the step in/step out sampling process described in the plan addresses the concerns EPA has expressed, because in GE's process stepping in requires first that a sample is below cleanup levels. EPA's comment is that there are two known areas of significant contamination. If a boring is placed at O-14 (the closest to EB-15), the next data point is O-16, which is located 50 feet away, and in an area under the former building and in an area known to have been disturbed. Therefore there may not be any possible correlation between the depth or concentrations of the contamination found at O-14 and those found at 0-16. GE may not be able to infer an excavation depth between these two points based on the location of these borings, without taking either additional borings or additional sampling during the actual excavation activity. This is further troublesome to the EPA as EB-15 represents the deepest contamination found at the Elm Street area. EPA therefore reserves the right to review the boring data and require GE to perform additional borings and collect additional data upon review of the Phase II grid sampling.*

Response: Acknowledged. No changes to the Pre-Design Work Plan are proposed in response to this comment.

Text Revision: None.

* * * * *

EPA Comment #8: *GE response to EPA's comment #52, page 25f [sic] 26: EPA understands therefore that GE will be performing the congener and arochlor [sic] data from the soil column study.*

Response: Acknowledged. No changes to the Pre-Design Work Plan are proposed in response to this comment.

Text Revision: None.

* * * * *

The following comments were presented in EPA's November 5, 2003 letter under the heading of "Additional EPA comments on the Draft GE FSP". However, these comments clearly apply to the Pre-Design Work Plan. Therefore, these comments have been included here.

EPA Comment #9: *Figure 7b: Estimated Schedule for Pre-Design: Phase II and submittal of the Pre-Design Report. The current schedule cannot be accepted by the EPA as it will place GE in noncompliance with the Order as it does not allow for the completion of the pre-design studies nor the pre-design report to be submitted within the 120 days required in the Order from the date of the approval of the work plan.*

Response: Figure 7b has been revised to reflect the conditions as discussed during conference calls between GE and EPA on November 5 and November 19, 2003. This schedule was approved in an electronic mail message from the EPA PM to GE dated November 26, 2003.

Text Revision: Figure 7b has been revised to reflect the above-referenced changes.

* * * * *

EPA Comment #10: *Mill Street, Section 4.5.3.2, page 4-27: Why are the Mill Street down gradient monitoring wells going to have five foot screens while the rest have 10 foot screens? Why does [sic] the procedures listed for split spoon reference 3 split spoon samples for all of the overburden wells , [sic] corresponding to the 6 foot depth interval centered at the same depth as the five foot well screen, when according to the previous text, only the down gradient wells have five foot screens and the rest 10 foot screens?*

Response: Five foot well screens are proposed for the downgradient overburden wells at Mill Street (MW-22A and B, MW-23A and B, and MW-24A and B) to allow a comparison between soil and groundwater analytical data within a relatively discrete vertical interval. Since the well screens for these overburden wells will be five feet in length and subsurface soil samples will be collected in two foot intervals, three soil samples will be required to characterize the five foot interval corresponding to the screened interval for the monitoring wells.

Text Revision: None.

* * * * *

RESPONSE TO QUALITY ASSURANCE PROJECT PLAN COMMENTS (EPA MEMORANDUM DATED JULY 11, 2003, JULY 10, 2003 CONFERENCE CALL BETWEEN EPA AND BBL, AND SEPTEMBER 10, 2003 CONFERENCE CALL BETWEEN EPA AND GE/BBL)

EPA General Comment #1

1. It is important that the project recognize the compounds of concern (COC) and that achieving the minimum reporting limits for those compounds is very important. Sensitivity is one of the PARCCS parameters and this needs to be added to section 11. Table 3 must highlight the COCs by bolding those compounds. The RLs found in updated Table 3 in general meet the 2 to 5 time lower than the project action limits (PALs) with some exceptions. For those compounds that do not meet that criteria and are critical in determining whether there is human health risk there may need to be further analytical work. Compounds that are COCs such as Chlorobenzene, pentachlorophenol, Benzo(a)pyrene, antimony, arsenic, lead and thallium will need further work. EPA's suggestion is to run the samples in the manner as stated in the QAPP. If these compounds are found above the RL and the data is valid, then no further work would be necessary. If the compounds are undetected at/or below the RL, then a more sensitive method would be employed to measure the compound or element. In the case of chlorobenze pentachlorophenol, and benzo(a)pyrene, these compounds could be quantitated using selected ion monitoring (SIM) to meet the RL/PAL 3X-5X relationship. For antimony, arsenic, lead, and thallium, these elements could be quantitated using ICP/MS or AA/furnace or hydride generation. It is very important that the non detects for these compound are found below the PAL. Please clarify how the project will meet the sensitivity criteria to support risk decisions.

Response

Since receipt of this comment, GE has requested that STL (the analytical laboratory) review their analytical methodologies in an attempt to revise some of the reporting limits (RLs) and method detection limits (MDLs) in question. As a result, the laboratory has provided revised reporting limits for certain constituents, which has addressed EPA's sensitivity concern (i.e., RLs 3 to 5 times lower than PALs) for some constituents. However, for water samples there remain a handful of constituents for which the RL is not 3 to 5 times below the PAL. For ease of discussion, the remainder of our response to this comment is presented by summarizing this issue as it relates to samples collected for the two media in question, soil and water. For each media, a general discussion is provided with respect to the relationship of the PALs to the laboratory RLs and MDLs, followed by a more specific discussion of the constituents (if any) for which this relationship is still an issue, combined with GE's proposed approach for addressing this issue.

Soil clean-up levels: EPA's September 1998 Record of Decision (ROD) established soil clean-up levels for five constituents: benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, PCBs and arsenic. The laboratory RL for each constituent is 3 to 5 times below the ROD-established soil clean-up level, with the exception of benzo(a)pyrene and arsenic. However, the MDL for benzo(a)pyrene is 3 to 5 times below the soil clean-up level which indicates that the constituent can be detected at estimated concentrations at the desired level. Further, the collection of surface soil samples for analysis of benzo(a)pyrene and arsenic was previously addressed in EPA's Comments #28 and #29 on the Pre-Design Work Plan (PD Work Plan) and GE's response to those comments. These comments and responses can be found in Attachment A of the Pre-Design Work Plan. In conclusion, the relationship of PALs to laboratory RLs is not an issue with

respect to analyses of soil samples. Therefore, GE recommends no further action on this subject with respect to soil sample analyses.

With respect to water samples, there are two types of PALs: interim groundwater cleanup levels (ICLs) established in the Record of Decision and maximum contaminant levels (MCLs), associated with national drinking water quality standards, which are an applicable or relevant and appropriate requirement (ARAR) for the Site. As a result, the analysis of water samples with respect to each of the PALs is discussed separately below.

ICLs: EPA's ROD established ICLs(PALs) for the following eight constituents: 1,2-dichloroethane, trichloroethylene, benzene, toluene, ethylbenzene, 1,2,4-trichlorobenzene, PCBs and manganese. The laboratory RL for each of these constituents is 3 to 5 times below the corresponding PALs. As a result, GE recommends no further action on this subject with respect to water sample analyses.

MCLs: This PAL has been established because of the expanded scope of the groundwater monitoring, as presented in EPA's Comment #7 on the Surface Water and Groundwater Monitoring Plan (WMP). (This comment and GE's response can be found in Attachment A of the revised draft WMP). This expanded monitoring is being conducted to comply with the ARAR standard in connection with the establishment, long-term monitoring, and eventually closure of the Groundwater Management Zone (GMZ) for the Site. The laboratory RLs for the following constituents are not 3 to 5 times lower than their corresponding MCLs:

- Vinyl Chloride
- 1,2-Dibromo-3-chloropropane
- Hexachlorocyclopentadiene
- Hexachlorobenzene
- Atrazine
- Pentachlorophenol
- Antimony
- Arsenic
- Selenium
- Thallium

The laboratory RLs for some of these constituents are lower than the corresponding MCL, but not 3 to 5 times lower. As acknowledged by EPA in a previous telephone conference, this sensitivity issue is not unique to this project in that conventional RLs for select compounds and constituents are not typically sensitive enough when compared against MCLs. Further, some of these constituents are likely not site related (e.g., atrazine, etc.).

Performance of the activities proposed in the PD Work Plan and WMP will include the establishment of upgradient (i.e., site-specific background) groundwater quality information, which could potentially result in the identification of site-specific background groundwater quality conditions with concentrations of certain constituents at levels greater than the MCLs. For instance, as demonstrated in Table 1 of the revised draft WMP (which summarizes EPA's RI groundwater data), several wells (including wells located upgradient and/or sidegradient of the Site) contained only one constituent for which PALs were established (manganese) at levels above the corresponding PAL, suggesting that the presence of this constituent may not be site-related.

Since the above-listed constituents are associated with the long-term groundwater monitoring activities at the Site and in the interest of moving forward with the soil and groundwater pre-design investigation activities presented in the Pre-Design Work Plan and the WMP, GE proposes to establish baseline (including background) groundwater quality information for each of the above-listed constituents. Further, GE will propose modifications, if necessary, to the laboratory

procedures and/or additional analytical procedures at a future point in time, as the data needs may require (i.e., prior to the elimination of such constituents from the groundwater monitoring program and/or modifications to the GMZ, performance of EPA's 5-year review, future risk assessment activities, etc.).

Text Revision

Section 11 of the QAPP was revised to include a new subsection discussing sensitivity. Additional revisions/additions to the QAPP will be made at a future date, as required, upon determination of modifications and/or additional laboratory procedures to achieve the MCLs for the above-listed constituents. Finally, Table 3 of the QAPP was revised to highlight COCs as requested.

* * * * *

EPA General Comment #2

2. In general the QAPP follows the the (sic)outline of the Region 1 QAPP manual but the worksheets that are used in the manual are not used in many cases the information required on each work sheet is not included in this QAPP in either the tables of (sic) in the text. This fact makes the document incomplete. A cross walk needs to be included at the beginning of this document to indicate where the required information can be found.

It is important that the QC limiting criteria for each of the analytical methods proposed to be used and the criteria that will be used to validate the data be found clearly stated in the tables. Information related to the matrix, analytical parameter concentration level, Laboratory SOP# does not appear to be found in either Table 5, Table 12, or Table 18 as it is required in Worksheets 11b, 22a/22b, and 24a/24b. The structure of the EPA Region 1 Manual allows the reviewer to remove any page and information about the matrix, analytical method, the SOP #, the analytical level, concentration level, and the specific QC criteria are all found together on that page. The information in the GE QAPP is found in many places in the document but is incomplete on individual pages. It appears that temperature blanks may be missing.

Response

See text revision below.

Text Revision

In accordance with the July 10 conference call between EPA and GE, a cross-walk was added to the QAPP, to assist the reader/user in finding all the compendium-required components of the QAPP. In addition, the QAPP tables were updated to include the requested cross-references to laboratory SOPs.

With respect to temperature blanks, Section 6.2.2 of Appendix F – Laboratory Sample Handling states that a upon receipt of samples, "[a] representative number of each sample cooler's bottles will be monitored for temperature using a Raytek IR Temperature Gun." Therefore, the use of temperature blanks was not included in Section 11 of the QAPP.

EPA General Comment #3

3. Although Section 4.2 does state the DQO for the specific data use, each section does not state that the data that will be generated will be of the highest quality definitive data to meet the specific objective being discussed. Measurement performance criteria describe what criteria will be used to support the specific decision being discussed but do not describe the level of quality of the data. If the MPCs have tight limits, and those limits are met and checked during data validation, then the data will be of the best quality. Please clarify the quality of the data that will be used to make each of the decisions discussed.

Response

See text revision below.

Text Revision

Since the majority of the data developed by the pre-design investigations will be used to make decisions regarding implementation of the Site remedy, these data will necessarily be characterized as definitive data. As defined in the QAPP, definitive data are data generated using analytical methods, such as approved EPA reference methods. Screening data will be collected during certain field activities (water column/NAPL measurements, visual inspections for NAPL/sheens, etc). However, these data will be used as supplemental data in guiding the field investigations and will be used in combination with other definitive data to make decisions related to implementation of the Site remedy.

Section 4.2 of the QAPP was revised to include additional text regarding the quality of data (e.g., screening data, screening data with definitive confirmation, and definitive data) that will be generated for each of the specified field investigations.

* * * * *

EPA General Comment #4

4. If field analytical instruments will be used to measure COCs in water, soil, or air, there should be a section describing the QC criteria related to those methods. If the data is to be used to make decisions about site conditions or site remediation strategies, there needs to be information in the QAPP. If the monitoring will be used to protect worker health and to determine the need for upgrading protective gear, then there is no need to mention it in the QAPP only the HASP.

Response

It is not anticipated that data from field analytical instruments will be used to make decisions about site conditions or site remediation strategies. In general, data from field analytical instruments (which is considered screening data as defined in Section 4 of the QAPP) will be used to guide the investigation as it progresses.

Text Revision

None.

* * * * *

EPA General Comment #5

5. Data validation: In our May 29th, 2003 meeting to discuss the first set of EPA comments EPA and the U.S. ACE understood that validation would follow the following guideline:

100% of all data would receive Tier I validation
*25% of **ALL** data used for delineation would receive Tier II validation; and*
10% of the data validated for Tier II would then receive Tier II validation. If any package failed in the 25% Tier II validation (sic), then all of the 25% would get Tier III validation (sic).

EPA and the U.S. Ace understood that delineation samples were any and all samples that would be used to determine areas for excavation. In other words any and all surface and subsurface samples. In addition, EPA understood that any samples taken for the soil column data, or any sample taken from the "hot spot", or any congener data would receive 100% Tier II validation.

The QAPP does not reflect this validation scenario and this must be reconciled. It appears that only samples the QAPP has determined will receive validation is from locations not subject to excavation (i.e. delineation samples) will be validated. This means that the validator would have to look through each data set to determine if a sample is above or below a remediation limit prior to validating the data to determine which samples will be validated. This does not make sense to the EPA as most sample delivery groups (SDGs) will contain data of multiple concentration ranges and it will be very difficult for EPA to determine what the Tier level percentages within a single package will be. If you wre (sic) to validate one sample in a package you would need to review all the SDG QC and essentially you end up validating all the samples in a package. In this case only 25% of samples on the very low end of the concentration range/calibration range would be validated and this translates to very few samples. It also appears that making the decision about which samples to validate, depending on concentration around a remediation goal would have had to be done prior to knowing whether any of the data is valid at all. Please correct the text to reflect the above outlined validation guidelines.

It is important that this section reference the various tables that define the specific measurement performance criteria that will be used as validation criteria. Each of the tables that contain QC criteria from holding times to spike recoveries need to be included. The use of the Region 1 Data Validation Guidelines is only an outline of what needs to be checked and how the checked are recorded. Page 2 of 3 states that deviations from the analytical method or any special reporting requirements apart from that specified in the revised QAPP will be detailed on COC forms. Those changes need to be approved by EPA and cannot be just made in the field. Approved changes in any protocol need to be transmitted first to the laboratory to make sure the changes are feasible and then to the validator so that the data will be reviewed properly.

Data validation reporting and documentation should follow the requirements in the Region 1 Data Validation Guidance.

Response

There may be confusion regarding the definition of "delineation samples". We believe that a delineation sample is any sample used to identify the boundary between the soil requiring excavation and subsequent treatment in accordance with a remedy versus soil that will not be excavated. In other words, soil samples with compounds or constituents that exceed EPA's soil clean-up levels, and will therefore be excavated and treated or excavated and disposed, will not be subject to data validation. To better illustrate this proposed approach, and as requested by the EPA, a flow chart was added to Section 20. In addition, a data usability flow chart was added as Figure 7 of the QAPP. These flow charts depict the following percentages of data validation for soil samples:

- Tier I validation: all collected soil samples;
- Tier II validation: 25% of all delineation samples and any samples for which deviations were cited during Tier I validation. Delineation samples are defined as those samples used to define the boundary between soils with constituent concentrations above (i.e., soils subject to remedial actions) and below the soil clean-up levels established in the ROD.
- Tier III validation: 10% of the samples subject to Tier II validation plus any samples for which deviations were cited during Tier II validation.

The entire groundwater data set will be subjected to the following validation percentages:

- Tier I validation: all collected samples;
- Tier II validation: 25% of all samples used to define the limits of the Site GMZ and any samples for which deviations were cited during Tier I validation. GMZ delineation samples are defined as those samples used to define the boundary between wells containing constituents in excess of the PALs and wells where such constituents are either not detected, or detected at levels below the PALs.
- Tier III validation: 10% of the samples subject to Tier II validation plus any samples for which deviations were cited during Tier II validation.

Any data used in a soil column study will be subjected to Tier III validation.

If after review of the final data set, and the conclusions drawn from this data set, the EPA believes decisions were based on invalid or questionable data, GE will possess the necessary information to perform higher levels of validation on specific samples or SDGs.

With respect to the EPA's comment regarding the ability to evaluate specific samples from an SDG, GE's proposed data validation approach is consistent with the approach used at GE's other Region 1 Sites. More specifically, while performance of certain data validation activities for specific samples does result in the performance of several common data validation activities for the entire SDG, our data management approach allows us to select specific samples from an SDG for validation to the required level. This approach makes sense since GE does not see the usefulness in performing higher levels of validation on samples subject to excavation and treatment/disposal.

With respect to EPA's comment regarding the statement, "...deviations from the analytical method or any special reporting requirements apart from that specified in the revised QAPP will

be detailed on COC forms", this sentence was inadvertently included in the revised draft QAPP and will be removed from the final QAPP.

Text Revision

Section 20 was revised to include a data validation flow chart and a summary of the typical items included in a data validation report. In addition, a data usability flow chart was added as Figure 7 of the QAPP. Also, the above-listed text regarding validation of groundwater samples was added to the final QAPP. Finally, the following text was deleted from the final QAPP: "...deviations from the analytical method or any special reporting requirements apart from that specified in the revised QAPP will be detailed on COC forms".

* * * * *

EPA General Comment #6

6. Section 21, Reconciliation With User Requirements is very inadequate. This section must describe in detail how the project will measure whether the DQOs have been met. At a minimum there should be some explanation of how data is determined to be usable for the purpose it was intended. If during data validation data is found to be deficient and not usable, this will create a completeness problem. Data gaps due to rejected data should not be extrapolated between usable data points. Diagram 6 of the Region 1 QAPP Manual depicts a proposed scheme of how data is reviewed. This section needs to describe how data will be reviewed and what will happen if data is found to have greater than planned uncertainty. Data must be reviewed to determine whether the PARCCS criteria have been met. For this project "S" (sensitivity) is a very important factor in determining whether there is any unacceptable risk. In some cases data usability may need to be depicted on a map or plan and the data array may show that there a geographic data gaps that may not have been seen during the planning phase of the project. This would be part of the reconciliation process.

Response

As indicated in the Response to Comment #3, Section 4.2 of the QAPP was revised to provide additional details regarding measurement performance criteria (MPC) for pre-design investigation activities.

Usability of data will be determined by comparison of the results of the data validation procedures to the MPC. Further, rejected data will not be acceptable for use as delineation samples. Should such delineation samples be rejected, GE will either utilize other existing grid samples that surround the location in question to revise the boundary between soil and/or groundwater subject to remedial actions and clean soils/groundwater, or GE will remobilize to the site and collect additional samples as required to delineate soils/groundwater subject to remedial actions.

A data usability flowchart was added to the QAPP to illustrate how the project will measure whether the DQOs have been met and how data usability deficiencies will be addressed.

With respect to sensitivity, GE understands the importance of sensitivity for this project. As indicated in Response to Comment #1, the laboratory RLs for the project-specific COCs for which soil clean-up levels or interim groundwater cleanup levels were established meet EPA's

sensitivity criterion requiring the RL for a constituent to be 3 to 5 times lower than the corresponding PALs. In addition, for site-related constituents, GE may propose (for EPA approval) modifications to laboratory procedures and/or new procedures to achieve certain groundwater MCLs, as the data needs may require (i.e., prior to the elimination of such constituents from the groundwater monitoring program and/or modifications to the GMZ, performance of EPA's 5-year review, future risk assessment activities, etc.).

Text Revision

Section 21 of the QAPP was be revised to reflect these clarifications. In addition, a data usability flowchart was included as Figure 7 of the QAPP.

* * * * *

EPA General Comment #7

7. PCBs in Groundwater: The analysis of groundwater or treated groundwater for PCBs using Aroclor analysis is acceptable when the concentrations are relatively high. When the concentrations reach down to 0.065 µg/L then the differentiation of the Aroclor pattern becomes problematic due to weathering. The analysis of the PCBs in groundwater by Aroclor analysis shall be confirmed by a GC/MS Total homologue or total congener method to make sure that the results are accurate. The number of confirmation samples should be performed only at the onset of the monitoring and the results evaluated to determine if future monitoring will continue to show that the water is not contaminated.

Response

GE has proposed to use EPA-approved SW-846 Method 8082 for the analysis of PCBs in groundwater. This proposed method currently achieves the EPA's sensitivity criterion recommending that the laboratory RL be 3 to 5 times lower than the PAL. Since the analysis of PCBs in groundwater are associated with the long-term monitoring of groundwater at the Site, GE may propose additional analytical methodologies or modifications to existing procedures as future data needs may require (i.e., prior to the elimination of such constituents from the groundwater monitoring program and/or modifications to the GMZ, performance of EPA's 5-year review, future risk assessment activities, etc.). However, in the interest of moving forward with the pre-design investigations, GE is proposing no additional laboratory analytical procedures/modifications to Method 8082 at this time.

Text Revision

None.

* * * * *

EPA Specific Comment #1

1. Table 4, Page 1 of 1: This table depicts the number of samples per location per analytical protocol. The numbers of groundwater samples appear to be much greater than originally planned. There need to be a foot note describing the numbers of potential rounds of sampling that will make up the number of samples depicted.

Response

The number of groundwater samples shown in this table represents multiple sampling rounds.

Text Revision

A footnote on Table 4 will be added to reflect this clarification.

* * * * *

EPA Specific Comment #2

2. Section 4.2.9: The PCB analysis of water for this site assumes that any PCBs found in the water in dissolved or particulate phases will be analyzed together. If the PCB chromatograms do not compare well with the PCB standards used in Method 8082, please clarify if there a contingency to use a congener or homoloque (sic) method to get a total PCB quantitation.

Response

At this time, there are no plans to use a congener or homologue method for PCB analyses, please refer to Response to EPA General Comment #7 above. Should modifications to existing laboratory procedures and/or additional laboratory procedures be required, GE will provide EPA with proposed modifications to the QAPP.

Text Revision

None.

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EPA Specific Comment #3

3. Table 12: Please correct the reference to Table 13 for accuracy/ bias for matrix spikes/matrix spike duplicates and surrogates to Table 5. The limits for MS/MSD, surrogates and LCSs are the compilation of the outer limits for a combination of all compounds being tested. Please clarify in a reference where the actual limits for each QC compound used can be found. Table 12 should also have the criteria for precision of the MS/MSD analyses as a measure of precision or reference Table 5.

Please clarify how the project will check the sensitivity of any of the methods to be used, especially the VOC, SVOC, PCB, Sb, As, Pb, and Tl analyses. The initial MDL study is one measure of sensitivity, but there is no check on that low number because there are no laboratory fortified blanks (LFBs) planned or low level standard reference materials (SRMs).

Response

In Table 12, the cross reference to Table 13 will be changed to Table 5.

In regard to the actual limits for each QC compound, the laboratory SOPs have been revised to include the most recent MDL numbers for the corresponding analytical methods.

In response to General Comment #1 above, GE indicated that the proposed analytical methods will achieve the sensitivity criterion of having laboratory RLs at levels 3 to 5 times lower than the corresponding PALs, for all but ten constituents. As indicated in that response, GE is proposing to move forward with the currently proposed investigations and methodologies until baseline/background groundwater quality data are collected. GE will propose additional analytical methodologies or modifications to existing procedures as future data needs may require (i.e., prior to the elimination of such constituents from the groundwater monitoring program and/or modifications to the GMZ, performance of EPA's 5-year review, future risk assessment activities, etc.).

Text Revision

Table 12 was revised as noted above.

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EPA Specific Comment #4

4. Table 14: Please correct the word "Quality" in the column 2 header to "Quantity".

Response

See text revision below.

Text Revision

Table 14 was revised to reflect this requested clarification.

* * * * *

EPA Specific Comment #5

5. Section 11.1.2 Comparability: If data is to be compared between phases of work, then there needs to be some criteria for the comparability between data sets.

Response

See text revision below.

Text Revision

Section 11.1.2 of the QAPP was revised to add information regarding comparability of data between data sets.

* * * * *

EPA Specific Comment #6

6. 11.1.3 Completeness: If a sample is collected and sent to the laboratory but is lost due to breakage or some internal laboratory failure it should be in the numerator as "Total number of samples collected" not as "Total number of results generated". Overall completeness is about having a data point for each sample planned and collected.

Response

See text revision below.

Text Revision

Sections 11.1.3 and 11.6 were revised to reflect this requested clarification.

* * * * *

EPA Specific Comment #7

7. Section 11.1.5 "reference standards": Please make it clear whether these are standard reference materials or they are certified reference standards of a separate origin other than the calibration standards. SRMs would be a very good measure of accuracy because they are matrix specific.

Response

Standard reference materials will be used.

Text Revision

Section 11.1.5 was revised to reflect this requested clarification.

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EPA Specific Comment #8

8. Table 10, Air monitoring procedures and Section 10.1.2: The FSP section B-1 does not mention in section the use of A General metal works Model PS-1 equipment for measuring PCBs in air. If this is a high volume sampler, then the procedure needs to be included in the QAPP and/or appendices to the FSP. I (sic) section 10.1.2, please clarify if PCB will be measured in air and what method will be used. Please clarify what definitive analytical method will be used to measure PCB. Please clarify where the PS-1 samples will be collected, at what frequency, and what the data will be used for as it will not be real time data.

Response

The air monitoring procedures described in FSP Appendix B-1 describe dust monitoring and organic vapor monitoring to be performed during the test pitting activities; and were added to the FSP in response to EPA Comment #38 on the Pre-Design Work Plan. This comment and GE's response can be found in Attachment A of the Pre-Design Work Plan. PCB air monitoring is not

necessary during the test pitting activity. To clarify this aspect of the project, Table 10 was revised to incorporate a reference to Appendix B.

The PCB air monitoring that is referenced in the QAPP relates to the air monitoring program that may be conducted during full-scale implementation of the site remedy. These procedures (including the analytical methodology and parameters) are detailed in Appendix K of the Field Sampling Plan. Additional specific details of this air monitoring program, including those issues raised in Comment #8, will be addressed in the Remedial Design.

Text Revision

Table 10 was revised to reflect this requested clarification.

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EPA Specific Comment #9

9. Table 11,VOCs in Soil: The reference SOP # AMV-5035-43 for VOCs in soil utilizes Method 5035. Method 5035 has been superseded by method 5035A. Please determine which method is to be used. Please correct all references to soil analysis to include 5035A/8260B.

Response

Method 5035A will be utilized.

Text Revision

Table 11 was revised to reflect this requested clarification.

* * * * *

EPA Specific Comment #10

10. Section 10 and all tables that describe methods: When describing the SW-846 methods please include the latest method revision Number. Please include all sample extraction, sample preparation, and sample clean-up methods that will be used for all samples to be collected and analyzed. This would include Table 4, Table 7, Table 11, and Table 12.

Response

See text revision below.

Text Revision

Section 10 and Tables 4, 7, 11, and 12 were revised to reflect this requested clarification.

* * * * *

EPA Specific Comment #11

11. Section 8.4 and Appendix F: It is important that the Region 1 Low Stress (Low flow procedure be adhered to as much as possible (sic). Peristaltic pumps should not be used when samples are being collected for VOCs. Any changes in the way samples are to be collected needs to be approved by EPA. The same equipment must be used for all wells during a single sampling episode. If different equipment is used for specific wells it must be stated and approved prior to use in the field. It is very important that low flow sampling be performed the identical way for each well to ensure that all data will be comparable. Any changes in equipment must be approved by EPA prior to use. The SOP still contains sections describing the use of bailers. There is no reason that bailers would be used at any of the wells at this site, other than the collection of the floc in Mw07a. The QAPP does not include any sampling for the floc. Please identify which type of pump will be used for this site.

Response

Appendix F includes an array of groundwater sampling procedures including low flow sampling. Because the monitoring wells were installed by many different entities over the course of many years, the condition and configuration of each well is not yet known. As such different sampling (i.e., pumping) equipment and/or techniques may be necessary and this decision will be made on a well-by-well basis. It is understood however, that if possible, the same sampling method and equipment should be utilized for each well during each sampling event. To further clarify this point, Appendix F of the FSP was revised to include a hierarchy of pumps that will be used during the performance of low-flow sampling. This hierarchy identified the initial sampling equipment to be used at each well, and included some notes regarding modifications to the types of pumps to be used during low flow sampling.

With respect to the Region 1 low flow sampling procedure, Appendix F has been developed in accordance with this procedure. Also, additional clarification on how these procedures will be applied has been itemized in our previous Response to EPA Comment #9 on the QAPP (Attachment A of the Revised QAPP). In regard to the flocculent material in MW-07A (or elsewhere), a sample will be collected, if present, using a bottom loading bailer. No laboratory characterization is currently planned for this material. However, EPA approval will be obtained prior to analyzing any non-aqueous phase liquid.

Text Revision

Appendix F of the FSP was revised to include a hierarchy of pumping equipment to be used during low-flow sampling.

* * * * *

EPA Specific Comment #12

12. Section 7.3: If TCLP is going to be used to measure leachable VOCs, then extraordinary care must be taken to prevent the loss of volatiles during the sampling and sample preparation operations. A description of how BB&L plans to accomplish the sampling without VOC loss needs to be placed in this section or as part of the FSP.

Response

As discussed in the July 10 conference call between EPA and GE, TCLP analyses will be used for waste characterization purposes only. Therefore, the requested description is not required.

Text Revision

None.

* * * * *

EPA Specific Comment #13

13. Section 8.5: Please clarify why sediment core sampling is being performed. There is no description in Section 4. If sediment samples are being collected along the perimeter of Elm Street property as part of the delineation of the soil contamination it should be stated. Please clarify whether the sediment samples are included in Table 4 as soils or are these samples for a different purpose. It should be noted that sediment percent moisture will modify the detection levels that can be achieved and create extraction efficiency problems. If the percent solids is (sic) less than 30% then the data is subject to the validation rules around low percent solids samples. Knowing the percent solids of these samples would allow the laboratory to increase the sample size for extraction, remove the excess water, and extract the samples with the most efficient procedure.

Response

Sediment core sampling is not currently being proposed – see previous Response to EPA Comment #4 on the Pre-Design Work Plan as well as EPA Comment #5 on the Field Sampling Plan (Attachment A in both revised documents). This section, as well as Appendix J, were included for potential future investigation within the drainage ditch adjacent to the Mill Street site.

Text Revision

None.

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EPA Specific Comment #14

14. Section 12.3 and Table 16: I (sic) would be very helpful if Table 16 had a cross reference to the Specific methods that will be run by the instruments and a reference to the SOP that will be used for that analysis. The referenced SOPs for these methods need to have specific maintenance criteria for the instruments included. Table 16 is a good general list of maintenance for the chemistry analyses by not as complete as other analyses detailed in Tables #5, #7, #12 and #14.

Response

See text revision below.

Text Revision

Table 16 was revised to reflect this clarification.

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EPA Specific Comment #15

15. Section 14: Each of the Laboratory Method SOPS or an SOP that describes the information about: What standards will be used?, From whom and where standards are procured?, How Standards and reagents are stored, How standards and reagents are prepared . Documentation requirements for all standards, needs to be referenced in this section. Reagents and consumables need to be documented in all relevant laboratory SOPs.

Response

Since the standards and reagents are different for each analytical method, the above-listed information is provided in the laboratory SOPs corresponding to each analytical method. The STL SOPs are included in Appendices A through D of the QAPP.

Text Revision

None.

* * * * *

EPA Specific Comment #16

16. Section 17: Prior to starting the sampling program, EPA would like to review the BB&L audit documentation for the STL-Buffalo laboratory annual audit. The audit must have been performed within the year prior to the commencement of this field activity.

Please clarify what is the frequency of the Field performance Audit and the Summaries (documentation). EPA reserves the right to send a field audit team to the site at the beginning of the sampling program for each of the matrices.

Response

GE requires independent third-party audits of its contract laboratories, including STL-Buffalo. These audits are performed every two years, with the most recent audit performed in September 2003. However, this laboratory routinely undergoes additional audits for other organizations/agencies. As a result, GE submited the executive summary from the July 2001 audit of STL-Buffalo, as well as the results of an audit performed by the American Association of Laboratory Accreditation dated August 2002 to EPA under separate cover. Finally, the U. S. Army Corps of Engineers (USACE) performed an audit of the STL-Buffalo laboratory from August 5 to August 7, 2003. Mr. Richard Kissinger is the contact person for this recent USACE audit, and he can be reached at 412 697-2569.

Text Revision

None.

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ATTACHMENT A

RESPONSE TO EPA COMMENTS ON FIELD SAMPLING PLAN DATED NOVEMBER 5, 2003

EPA Comment #1: *Appendix A - Soil Boring Installation and Soil Sampling Procedures: Section III is written with no clear hierarchy for the use of hollow-stem augers vs driven casing. It is EPA's understanding that GE/BBL will initiate first an attempt to use hollow stem augering prior to going to a drive and wash method (not withstanding separate protocols regarding DNAPL issues). It is also not clear when direct push techniques will be used.*

Response: With the exception of the downgradient monitoring wells at the Mill Street Area (MW-22A,B,C; MW-23A,B,C; and MW-24A,B,C), all monitoring wells will be installed using hollow-stem augers. Based on concerns regarding the potential presence of DNAPL at the three aforementioned Mill Street well clusters, all nine of those wells will be installed using driven casing. Direct push soil sampling will be performed for all grid-based soil sampling activities.

Text Revision: Additional text has been added to Appendix A to clarify when/where the various drilling methods will be used.

* * * * *

EPA Comment #2: *Appendix E - Monitoring Well Installation and Development Procedures:* [Please note that EPA raises multiple issues in Comment #2 - we have broken this comment down to address each issue separately.]

EPA Comment #2a: *Section III Procedures: No hierarchy for techniques have [sic] been presented.*

Response: With the exception of the downgradient monitoring wells at the Mill Street Area (MW-22A,B,C; MW-23A,B,C; and MW-24A,B,C), all monitoring wells will be installed using hollow-stem augers. Based on concerns regarding the potential presence of DNAPL at the three aforementioned Mill Street well clusters, all nine of those wells will be installed using driven casing.

Text Revision: Additional text has been added to Section III to clarify when/where the various drilling methods will be used.

* * * * *

EPA Comment #2b: *Section III, step 2 - If the ASTM D-1586 method is not to be followed, what is the alternative?*

Response: ASTM D-1586 will be followed during monitoring well installation activities.

Text Revision: Section III, step 2 has been revised to indicate that ASTM D-1586 will be followed during monitoring well installation activities.

* * * * *

EPA Comment #2c: *Section III, step 3 - In what circumstance would you expect not to install a 2 inch diameter, flush-threaded PVC slotted well screen?*

Response: All monitoring wells will be installed with 2-inch diameter, flush-threaded PVC slotted well screen.

Text Revision: Section III, step 3 has been revised to indicate that all monitoring wells will be installed with 2-inch diameter, flush-threaded PVC slotted well screen.

* * * * *

EPA Comment #2d: *Section IV - procedures for NAPL well installation - The description presented does not select a preferred method for installation of the boring. Section VII should be referenced or incorporated.*

Response: As indicated in GE's Response to EPA Comment #2A above, monitoring wells proposed for areas where DNAPL may be present (i.e., the downgradient monitoring wells at the Mill Strect Area: MW-22A,B,C; MW-23A,B,C; and MW-24A,B,C) will be installed using driven casing and the procedures specified in Section VII of Appendix E. However, the remainder of the wells proposed for installation at both the Mill and Elm Street Areas will be installed using hollow-stem augers. If potentially mobile DNAPL is interpreted to be present during the installation of monitoring wells using the hollow-stem auger drilling method at an elevation above the design depth for the monitoring well, the following will occur:

1. The borehole with the observed DNAPL will be abandoned by grouted with neat cement grout. A new borehole will then be initiated at an adjacent location;

2. If DNAPL is encountered in the replacement soil boring (suggesting that DNAPL is more pervasive, or "pooled"), the double casing drilling method specified in Section VII will then be employed at this boring location. If no DNAPL or only residual DNAPL is deemed to be present, drilling with hollow stem augers will continue; and

3. Following consultation with the on-site EPA representative, a DNAPL monitoring well, including a grouted sump, may be installed with the screen at the depth interval of the interpreted mobile DNAPL, if encountered.

Text Revision: Section IV has been revised to include the above-listed text.

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EPA Comment #2e: *Section IV, step 2 - the SOP for the jar shake test should be referenced.*

Response: Acknowledged.

Text Revision: Section IV has been revised to include a reference to Appendix U – Soil/Water Shake Test Procedures.

* * * * *

EPA Comment #2f: *Section V - Procedures for Direct Push - no conditions listed as to when this method would be most appropriate to use in the field. The top of E-6 indicates language for a DNAPL bedrock well and belongs in another section.*

Response: While direct push techniques will be used for performance of the Phase 2 subsurface soil sampling activities, such techniques will not be used to install any of the monitoring wells proposed for installation during the Phase 2 investigation activities. Nevertheless, this procedure has been retained for potential future use. EPA will be informed prior to any well installation activities should direct push techniques be proposed

for installation of such wells. Further, the reference to the DNAPL bedrock well was extraneous and has been deleted.

Text Revision: Section V has been revised to indicate that direct push techniques are not proposed to install any of the Phase 2 monitoring wells and to remove the reference to the DNAPL bedrock well.

* * * * *

EPA Comment #2g: *Section XI - A. Procedures for monitoring well development - the equipment to be utilized shall be presented in order of preferred use or by conditions warranting use. What if the well never stabilizes below 50 NTU's?*

Response: The order of preferred use for pumping equipment during monitoring well development activities is as follows:

1. Electric submersible pump;
2. Peristaltic pump;
3. Surface inertial pump (Waterra™ pump).

Step 8 under Section XI, Part C contains information regarding the procedures for well development and provides contingency information regarding the completion of well development activities should the well not stabilize below 50 NTU.

Text Revision: Section XI - A. Procedures for monitoring well development have been revised to include the pumping equipment hierarchy presented above.

* * * * *

EPA Comment #2h: *Section XI - B. Materials for monitoring well development - No specific pump type is provided for in the materials. Under what conditions would you expect to use a bailer to develop the well.*

Response: The equipment for monitoring well development will be utilized in the hierarchy presented in the response to EPA Comment #2g. Bottom loading bailers may be utilized when discrepancies are noted by field personnel regarding the measured depth of a monitoring well compared to the reported depth of the well as constructed, which may indicate the presence of accumulated soil/sediment in the bottom of the well in question. Under such conditions, a bottom-loading bailer would be utilized to remove such accumulated soils/sediment prior to well development activities.

Text Revision: Section XI - B. Materials for monitoring well development has been revised to include the pumping equipment hierarchy specified in the Response to EPA Comment #2g provided above.

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EPA Comment #2i: *Section XI - C. Page E-9 - remove all language relative to bailing within the description of the process for use of a pump.*

Response: Acknowledged.

Text Revision: Section XI – C has been revised to remove the reference to bailing within the procedures for monitoring well development using a pump.

* * * * *

Draft for EPA Review

GE Supplemental Delineation Sampling Proposal dated March 17, 2004 (excluding figures)

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Transmitted via Federal Express

March 17, 2004

Cheryl Sprague
Remedial Project Manager
Office of Site Remediation and Restoration
U.S. Environmental Protection Agency
One Congress Street, Suite 1100 (HBO)
Boston, MA 02114-2023

Re: Proposed Supplemental Pre-Design Delineation Soil Sampling Activities
Fletcher's Paint Works and Storage Facility Superfund Site, Operable Unit 1
Milford, New Hampshire
CERCLA Docket No. 01-2001-0063

Dear Ms. Sprague:

The General Electric Company (GE), through its subcontractor Blasland, Bouck & Lee Inc., (BBL), recently completed the majority of the soil sampling investigation activities proposed in the November 2003 *Pre-Design Work Plan* (PDWP). Specifically, with the exception of several surface soil samples located outside the fencing at the Elm Street Site, BBL has completed the collection and analyses of all soil samples proposed in the PDWP for both the Mill and Elm Street Sites. Additionally, based on the preliminary results of soil samples collected from the Mill Street Site, a supplemental row of soil borings was installed within the railroad property. Based on the preliminary results of the soil sampling data from these initial investigations we have identified the need for additional delineation soil sampling activities at both sites.

This submittal includes supplemental materials developed by BBL to support this proposal for supplemental pre-design delineation soil sampling activities, tables summarizing the proposed delineation soil sampling activities and figures illustrating the locations and depths at which these samples will be collected. All delineation soil samples included in this proposal will be sampled and analyzed for PCBs in accordance with the approved PDWP and Project Operations Plan. For reference, this submittal also contains summary tables presenting the BBL pre-design and EPA historic soil sampling data collected to date at this site. To determine the need for additional delineation soil sampling activities at the Site, GE reviewed the existing site data utilizing the logic presented in the step-in/step-out decision tree provided as Figure 6 of the PDWP and briefly described below:

- The locations of every sample exceeding the Soil Cleanup Levels (SCLs) were reviewed with respect to the physical boundaries of the site and the need for additional delineation. For example, it was assumed that horizontal delineation of samples would not be required in the cemetery adjacent to the Elm Street Site. The topography of both sites was also considered in determining the need for horizontal delineation. Specifically, where steep elevation changes are observed horizontal delineation of soils at downhill locations is not possible.

- Since most surface soil samples at both the Elm and Mill Street Sites contained PCBs at concentrations above the SCLs, the need for horizontal delineation sampling activities within the top foot of each site generally focused on the perimeter of both sites and not interior sample locations.

- For subsurface soils at both sites, horizontal delineation soil samples were typically proposed at four locations around each soil boring containing a sample that exceeds the SCLs (i.e., north, south, east, and west). These horizontal delineation soil borings were typically proposed at distances between 10 to 25 feet from the soil boring containing the sample(s) subject to delineation. In certain instances where multiple adjacent soil borings contained samples exceeding the SCLs at the same depth (i.e., each boring has a sample containing PCBs above the SCL at 3- to 5-feet below grade), horizontal delineation soil samples were proposed around the entire area.

- The soil borings at both sites fell into two general categories: soil borings which have discrete sample intervals containing PCBs greater than the SCLs (e.g., only the 5- to 7-foot depth increment); and soil borings containing multiple (i.e., continuous) soil samples containing PCBs in excess of the SCLs. As a result, two different approaches to conducting delineation sampling activities are being proposed. For soil borings with discrete samples greater than the SCLs, GE is proposing to collect horizontal delineation samples at adjacent sample locations from the depth intervals above, at, and below the depth interval corresponding to the sample requiring delineation (i.e., if an existing sample contains PCBs above the SCL at 5- to 7-feet below grade, samples will be collected from the 3- to 5-foot, 5- to 7-foot, and 7- to 9-foot depth intervals at the adjacent horizontal delineation borings and submitted for analysis of PCBs). For soil borings with multiple (i.e., continuous) soil samples containing PCBs in excess of the SCLs, continuous soil sampling will be performed to two feet below the depth increment corresponding to the maximum depth at which PCB soil sample data exceeded the SCL. With the exception of the sample from the last depth increment, all samples will be submitted to the laboratory for analysis of PCBs. The sample from the last depth increment will be extracted and held pending the results of the samples from the overlying depth increments.

- Certain areas requiring additional delineation sampling activities are potentially disruptive to the Town of Milford (i.e., Elm and Mill Streets). Due to logistical and safety concerns of sample collection personnel, two rows of horizontal delineation soil samples will be installed in certain areas along Elm and Mill Streets. Samples from the first row (i.e., those samples closest to the samples requiring delineation) will be submitted to the analytical laboratory for PCB analyses. The second row of samples will also be submitted to the analytical laboratory. However, these samples will be extracted and held pending the results of the first row of samples. If any sample from the first row is below the SCL, the corresponding sample collected from the second row will not be analyzed for PCBs. By collecting two rows of samples where noted, GE hopes to achieve horizontal delineation of the soils associated with samples exceeding the SCLs, while minimizing the potential for future disruption to the Town of Milford and its residents posed by multiple mobilizations. It should be noted that only one row of soil samples are proposed for the section of Mill Street between the former Fletcher property and the residential properties on the opposite side of the street, since excavation of soils was previously performed at those properties.

- A few notable exceptions exist with respect to the delineation procedures discussed above. Specifically, those exceptions include sample locations where only surface soil samples were collected and those surface concentrations exceed the subsurface SCLs and EPA soil boring

locations where an exceedance of an SCL was observed and continuous soil sampling activities were not performed. At these locations, GE has proposed to collect vertical delineation samples from the two intervals directly underlying the sample requiring delineation. Both samples will be submitted to the analytical laboratory. However, similar to the approach for horizontal delineation samples in Mill and Elm Streets described above, only the sample from the interval directly underlying the sample requiring delineation will be subject to PCB analysis. The second sample will be extracted and held, pending the results of the sample from the overlying depth increment. If that result is below the SCL, the second sample will not be analyzed for PCBs.

While the intent of the additional soil investigations proposed in the attached document is to completely delineate the extent of soils containing PCBs above the SCLs, additional delineation soil sampling activities may be required in the future based upon the results of these investigations. GE is also anticipating the need to perform additional delineation soil sampling activities at the Elm Street Site once the exact location of the utility corridor is identified by the Town of Milford. Such additional delineation activities may be necessary, since the subsurface soils within this corridor up to a depth of 10 feet below grade are subject to an SCL for PCBs of 25 ppm.

I look forward to discussing this proposal with you at our meeting on Thursday, March 25, 2004 at 12:00 EST at EPA's laboratory in Chelmsford, Massachusetts. In the meantime, please do not hesitate to call me with any questions regarding the information contained herein.

Sincerely,

Lewis S. Streeter
Remedial Project Manager

V:\GE_Fletcher_Paint\Correspondence\14842196.doc

cc: Andy Beliveau, EPA
Scott Acone, USACE
Tom Andrews, NHDES
Corey Averill, BBL

TABLE 1
PCB DELINEATION SAMPLING - ELM STREET SITE

FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1

GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples											
				0-1'	1-3'	3-5'	5-7'	7-9'	9-11'	11-13'	13-15'	15-17'	17-19'	19-21'	21-23'
2-CG-S06A / Q16 (▲)	6'	218	Q16E	--	--	P (2' - 4')	P (4' - 6')	P (6' - 8')	--	--	--	--	--	--	--
			Q16N	--	--	P (2' - 4')	P (4' - 6')	P (6' - 8')	--	--	--	--	--	--	--
			Q16S	--	--	P (2' - 4')	P (4' - 6')	P (6' - 8')	--	--	--	--	--	--	--
			Q16W	--	--	P (2' - 4')	P (4' - 6')	P (6' - 8')	--	--	--	--	--	--	--
E02 / SS-18 (▲) (Δ)	1'	1.1 / 7.8	E02NE	P	--	--	--	--	--	--	--	--	--	--	--
			E02W	P	--	--	--	--	--	--	--	--	--	--	--
			F02	X	--	--	--	--	--	--	--	--	--	--	--
			SS-18E	P	--	--	--	--	--	--	--	--	--	--	--
EB-03B (▲)	13'	150	EB-03B	--	P	P	P	X	P	X	P	X	X	X	--
			EB-03BE	--	H	H	H	--	P	P	P	--	--	--	--
			EB-03BN	--	H	H	H	--	P	P	P	--	--	--	--
			EB-03BS	--	H	H	H	--	P	P	P	--	--	--	--
			EB-03BW	--	H	H	H	--	P	P	P	--	--	--	--
EB-15 (▲)	2.5'	5,000	EB-15	--	X (2.5')	P (2.5' - 4.5')	H (4.5' - 6.5')	--	--	--	--	--	--	--	--
			EB-15E	--	P (1' - 2.5')	H (2.5' - 4.5')	H (4.5' - 6.5')	--	--	--	--	--	--	--	--
			EB-15S	--	P (1' - 2.5')	H (2.5' - 4.5')	H (4.5' - 6.5')	--	--	--	--	--	--	--	--
			O14E	Sampled as Delineation Location for O14											
			O14S	Sampled as Delineation Location for O14											
G04 (▲)	1'	21	G04NW	P	--	--	--	--	--	--	--	--	--	--	--
H02 / H03 (Δ)	1'	2 / 51	H02W	P	--	--	--	--	--	--	--	--	--	--	--
			H03NW	P	--	--	--	--	--	--	--	--	--	--	--
			H03SW	P	--	--	--	--	--	--	--	--	--	--	--
			H03SE	P	--	--	--	--	--	--	--	--	--	--	--
H05 / SS-28 (▲) (Δ)	1'	43 / 14.6	H05S	P	--	--	--	--	--	--	--	--	--	--	--
I06 (▲)	9'	310	I06E	--	P	P	P	P	H	--	--	--	--	--	--
			I06N	--	P	P	P	P	H	--	--	--	--	--	--
			I06S	P	P	P	P	P	H	--	--	--	--	--	--
			I06W	P	P	P	P	P	H	--	--	--	--	--	--
I08 (▲)	11'	120	EB-03BN	Sampled as Delineation for EB-03											
			EB-03BW	Sampled as Delineation for EB-03											
			I08NW	--	--	--	--	P	P	P	--	--	--	--	--
			I08W	--	--	--	--	P	P	P	--	--	--	--	--
J07 (Δ)	1'	27	K07W	P	--	--	--	--	--	--	--	--	--	--	--
K08 (▲)	3'	1,000	EB-03BS	Sampled as Delineation for EB-03B											
			K08E	--	P	H	--	--	--	--	--	--	--	--	--
			K08S	P	P	H									
			K08SW	P	--	--	--	--	--	--	--	--	--	--	--
			K08W	P	P	H	--	--	--	--	--	--	--	--	--
K16 (▲)	11'	190	K16NE	--	--	--	--	P	P	P	--	--	--	--	--
			K16SE	--	--	--	--	P	P	P	--	--	--	--	--
			L16	X	--	--	--	P	P	P	--	--	--	--	--
K18 (▲)	12'	150	K18E	--	P	P	P	P	P	P (12')	H (12' - 14')	H (14' - 16')	--	--	--

TABLE 1
PCB DELINEATION SAMPLING - ELM STREET SITE

FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1

GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples											
				0-1'	1-3'	3-5'	5-7'	7-9'	9-11'	11-13'	13-15'	15-17'	17-19'	19-21'	21-23'
			K18N	--	P	P	P	P	P	P (12')	H (12' - 14')	H (14' - 16')	--	--	--
			K18S	--	P	P	P	P	P	P (12')	H (12' - 14')	H (14' - 16')	--	--	--
			K18W	--	P	P	P	P	P	P (12')	H (12' - 14')	H (14' - 16')	--	--	--
L12 / M12 (▲)	3'	140 / 78[110]	L12N	--	P	H	--	--	--	--	--	--	--	--	--
			L12SE	--	P	H	--	--	--	--	--	--	--	--	--
			L12SW	--	P	H	--	--	--	--	--	--	--	--	--
			SS-17	X	P	H	Also See SS-17 for Additional Sampling Details								
L14 (▲)	3'	7,200	L14E	--	P	H	--	--	--	--	--	--	--	--	--
			L14W	--	P	H	--	--	--	--	--	--	--	--	--
			M14	X	X	X	X	X	X	X	X	X (16' - 18')	X (18' - 20')	X (20' - 22')	--
L15 (Δ)	1'	290	L15	X	P	H	--	--	--	--	--	--	--	--	--
			L14E	Sampled as Delineation Location for L14											
			L15E	--	H	H	--	--	--	--	--	--	--	--	--
			L15S	--	H	H	--	--	--	--	--	--	--	--	--
M08 (▲)	1'	57	M08W	P	--	--	--	--	--	--	--	--	--	--	--
			N08	P	--	--	--	--	--	--	--	--	--	--	--
			N09	P	--	--	--	--	--	--	--	--	--	--	--
M18 (▲)	5'	580	M18N	--	P	P	H	--	--	--	--	--	--	--	--
			M18E	--	P	P	H	--	--	--	--	--	--	--	--
			M18S	--	P	P	H	--	--	--	--	--	--	--	--
			M18W	--	P	P	H	--	--	--	--	--	--	--	--
N18 (Δ)	1'	1.9	N18E	P	--	--	--	--	--	--	--	--	--	--	--
O10 (▲)	1'	130	O9	P	--	--	--	--	--	--	--	--	--	--	--
O14 (▲)	17'	150	O14N	--	P	P	P	P	P	P	P	P	H	--	--
			O14E	--	P	P	P	P	P	P	P	P	H	--	--
			O14S	--	P	P	P	P	P	P	P	P	H	--	--
			O14W	--	P	P	P	P	P	P	P	P	H	--	--
O16 (▲)	9'	190	O16N	--	P	P	P	P	H	--	--	--	--	--	--
			O16E	--	P	P	P	P	H	--	--	--	--	--	--
			O16S	--	P	P	P	P	H	--	--	--	--	--	--
			O16W	--	P	P	P	P	H	--	--	--	--	--	--
O18 (▲)	8'	450	O18N	--	P	P	P	P (8')	H (8' - 10')	--	--	--	--	--	--
			O18E	P	P	P	P	P (8')	H (8' - 10')	--	--	--	--	--	--
			O18S	--	P	P	P	P (8')	H (8' - 10')	--	--	--	--	--	--
			O18W	--	P	P	P	P (8')	H (8' - 10')	--	--	--	--	--	--
P17 (Δ)	1'	120	P17	X	P	H	--	--	--	--	--	--	--	--	--
			P17N	--	H	H	--	--	--	--	--	--	--	--	--
			P17E	--	H	H	--	--	--	--	--	--	--	--	--
			P17S	--	H	H	--	--	--	--	--	--	--	--	--
			P17W	--	H	H	--	--	--	--	--	--	--	--	--
Q09 (Δ)	1'	7.6	P09	P	--	--	--	--	--	--	--	--	--	--	--
			Q09W	P	--	--	--	--	--	--	--	--	--	--	--

TABLE 1
PCB DELINEATION SAMPLING - ELM STREET SITE

FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1

GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples											
				0-1'	1-3'	3-5'	5-7'	7-9'	9-11'	11-13'	13-15'	15-17'	17-19'	19-21'	21-23'
Q12 (▲)	4'	130	Q12N	--	P	P (4')	H (4' - 6')	--	--	--	--	--	--	--	--
			Q12E	--	P	P (4')	H (4' - 6')	--	--	--	--	--	--	--	--
			Q12S	--	P	P (4')	H (4' - 6')	--	--	--	--	--	--	--	--
			Q12W	--	P	P (4')	H (4' - 6')	--	--	--	--	--	--	--	--
Q14 (▲)	3'	9,100	Q14E	--	P	H	--	--	--	--	--	--	--	--	--
			Q14S	--	P	H	--	--	--	--	--	--	--	--	--
			Q14W	--	P	H	--	--	--	--	--	--	--	--	--
			SS-26	X	P	H	--	--	--	--	--	--	--	--	--
R09 (Δ)	1'	34	R09W	P	--	--	--	--	--	--	--	--	--	--	--
			R09S	P	--	--	--	--	--	--	--	--	--	--	--
			R09SS	H	--	--	--	--	--	--	--	--	--	--	--
R10 (Δ)	1'	9.8	R10S	P	--	--	--	--	--	--	--	--	--	--	--
			S11WW	Sampled as Delineation for S11											
S11 (Δ)	1'	140	S11	X	P	H	--	--	--	--	--	--	--	--	--
			S11E	--	H	H	--	--	--	--	--	--	--	--	--
			S11N	--	H	H	--	--	--	--	--	--	--	--	--
			S11S	P	H	H	--	--	--	--	--	--	--	--	--
			S11SS	H	H	H	--	--	--	--	--	--	--	--	--
			S11W	P	H	H	--	--	--	--	--	--	--	--	--
			S11WW	H	H	H	--	--	--	--	--	--	--	--	--
S12 (▲)	1'	110 [92]	S12S	P	--	--	--	--	--	--	--	--	--	--	--
			S12SS	H	--	--	--	--	--	--	--	--	--	--	--
S13 (Δ)	1'	39	S13S	P	--	--	--	--	--	--	--	--	--	--	--
			S13SS	H	--	--	--	--	--	--	--	--	--	--	--
S14 / 2-CS-S04-A(▲)	1'	73 / 111	S14S	P	--	--	--	--	--	--	--	--	--	--	--
			S14SS	H	--	--	--	--	--	--	--	--	--	--	--
SS-15 (Δ)	1'	1,100	O12	X	X	X	X	X	X	X	X	X	X	X	--
			SS-15	X	P	H	--	--	--	--	--	--	--	--	--
			SS-15E	--	H	H	--	--	--	--	--	--	--	--	--
			SS-15S	--	H	H	--	--	--	--	--	--	--	--	--
			SS-15W	--	H	H	--	--	--	--	--	--	--	--	--
SS-16 (Δ)	1'	1.97	SS-16NE	P	--	--	--	--	--	--	--	--	--	--	--
			SS-16NW	P	--	--	--	--	--	--	--	--	--	--	--
			SS-16SE	P	--	--	--	--	--	--	--	--	--	--	--
			SS-16SW	P	--	--	--	--	--	--	--	--	--	--	--
SS-17 (Δ)	1'	550	M12	X	X	X	X	X	X	X	X	X	X	X	X
			SS-17	X	P	H	--	--	--	--	--	--	--	--	--
			SS-17E	--	H	H	--	--	--	--	--	--	--	--	--
			SS-17S	--	H	H	--	--	--	--	--	--	--	--	--
			SS-17W	--	H	H	--	--	--	--	--	--	--	--	--
SS-19 (Δ)	1'	227	D05	P	H	H	--	--	--	--	--	--	--	--	--
			SS-19	X	P	H	--	--	--	--	--	--	--	--	--

TABLE 1
PCB DELINEATION SAMPLING - ELM STREET SITE

FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1

GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples											
				0-1'	1-3'	3-5'	5-7'	7-9'	9-11'	11-13'	13-15'	15-17'	17-19'	19-21'	21-23'
			SS-19S	--	H	H	--	--	--	--	--	--	--	--	--
			SS-19W	--	H	H	--	--	--	--	--	--	--	--	--
SS-20 (Δ)	1'	311	SS-20	X	P	H	--	--	--	--	--	--	--	--	--
			SS-20S	--	--	H	H	(See Note 4)							
			SS-20W	--	--	H	H	(See Note 4)							
SS-21 (Δ)	1'	280	SS-21	X	P	H	--	--	--	--	--	--	--	--	--
			L13	P	--	H	H (5 - 6')	(See Note 4)							
			L14	X	X	X	X	X	X	--	--	--	--	--	--
			L14W	--	P	H	H (5 - 6')	(See Note 4)							
SS-25 (Δ)	1'	1.09	SS-25NE	P	--	--	--	--	--	--	--	--	--	--	--
			SS-25NW	P	--	--	--	--	--	--	--	--	--	--	--
			SS-25SE	P	--	--	--	--	--	--	--	--	--	--	--
			SS-25SW	P	--	--	--	--	--	--	--	--	--	--	--
SS-26 (Δ)	1'	1,300	SS-26	X	P	H	--	--	--	--	--	--	--	--	--
			SS-26N	--	H	H	--	--	--	--	--	--	--	--	--
			Q14E	Sampled as Delineation for Q14											
			Q14S	Sampled as Delineation for Q14											
			Q14W	Sampled as Delineation for Q14											
SS-27 (Δ)	1'	1.54	E00	P	--	--	--	--	--	--	--	--	--	--	--
			E01	X	--	--	--	--	--	--	--	--	--	--	--
			F00	P	--	--	--	--	--	--	--	--	--	--	--
			F01	P	--	--	--	--	--	--	--	--	--	--	--
SS-38 (Δ)	1'	100	SS-38	X	P	H	--	--	--	--	--	--	--	--	--
			SS-38NE	--	H	H	--	--	--	--	--	--	--	--	--
			SS-38NW	--	H	H	--	--	--	--	--	--	--	--	--
			SS-38SE	--	H	H	--	--	--	--	--	--	--	--	--
			SS-38SW	--	H	H	--	--	--	--	--	--	--	--	--
T20 (Δ)	1'	2.2	T19	X	--	--	--	--	--	--	--	--	--	--	--
			T20S	P	--	--	--	--	--	--	--	--	--	--	--
			T20SS	H	--	--	--	--	--	--	--	--	--	--	--
			T21	P	--	--	--	--	--	--	--	--	--	--	--

Notes:
1. (Δ) indicates surface samples and (▲) indicates subsurface samples.
2. -- = No sample proposed for this depth increment.
3. Where indicated, samples for certain depth increments were collected to the depth indicated.
4. The proposed depth of sampling at this location is based upon elevation changes associated with site topography.

TABLE 2
PCB DELINEATION SAMPLING - MILL STREET SITE

FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1

GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples													
				0-1'	1-3'	3-5'	5-7'	7-9'	9-11'	11-13'	13-15'	15-17'	17-19'	19-21'	21-23'	23-25'	25-27'
B13 (▲)	11'	2.2	B13E	P	--	--	--	P	P	P	--	--	--	--	--	--	--
			B13N	P	--	--	--	P	P	P	--	--	--	--	--	--	--
			B13W	P	--	--	--	P	P	P	--	--	--	--	--	--	--
			C13N	Sampled as Delineation Location for C13													
B17 (▲)	5'	2.7	B17N	P	P	P	H	--	--	--	--	--	--	--	--	--	--
			C17	X	X	X	X	X	X	X	X	X	X	X (20.2')	--	--	--
			C17NE	Sampled as Delineation Location for C17													
			C17NW	Sampled as Delineation Location for C17													
C01 (▲)	25'	9.5	B01	--	--	--	--	--	X	X	X	--	--	--	X	X	X
			C01E	--	--	--	--	--	P	P	P	--	--	--	P	P	P
			C01S	(See Note 4)													
			C01W	--	--	--	--	--	P	P	P	--	--	--	P	P	P
C05 (▲)	1'	7	C05N	P	--	--	--	--	--	--	--	--	--	--	--	--	--
C06 (▲)	3	1,500	C06N	--	P	H	--	--	--	--	--	--	--	--	--	--	--
			C06W	--	P	H	--	--	--	--	--	--	--	--	--	--	--
			C07W	Sampled as Delineation Location for C07 & D07													
			D07W	Sampled as Delineation Location for C07 & D07													
C07/D07 (▲)	21.4' / 21'	13 / 1.1	C07E	--	P	P	P	P	P	P	P	P	P	P	P (21.5')	(See Note 5)	
			C07N	--	--	P	P	P	P	P	P	P	P	P	P	P	(See Notes 5 and 6)
			C07W	--	P	P	P	P	P	P	P	P	P	P	P (21.5')	(See Note 5)	
			D07SE	--	P	P	P	P	P	P	P	P	P	P	P (21.5')	(See Note 5)	
			D07W	--	P	P	P	P	P	P	P	P	P	P	P (21.5')	(See Note 5)	
C08 & C09/MW-22 (▲)	7' / 8'	2.4 / 1.8	C07E	Sampled as Delineation Location for C07 & D07													
			C08N	--	--	P	P	P	P	P	H	(See Notes 5)					
			C10	--	P	P	P	P (8')	H (8' - 10')	--	--	--	--	--	--	--	--
			D08	X	P	P	P	P (8')	H (8' - 10')	--	--	--	--	--	--	--	--
			D09	--	P	P	P	P (8')	H (8' - 10')	--	--	--	--	--	--	--	--
C11 (▲)	13'	3.7	C11N	--	--	P	P	P	P	P	P	P	P (18')	H (18' - 20')	(See Note 6)		
			C11W	--	P	P	P	P	P	P	H	--	--	--	--	--	--
			C12W	Sampled as Delineation Location for C12													
			D11	X	P	P	P	P	P	P	H	--	--	--	--	--	--
C12/C13/D13 (▲)	19.8' / 18.7' / 23'	1,300 / 12 / 4,300	C12NE	--	--	P	P	P	P	P	P	P	P	P	P	(See Note 5)	
			C12SW	--	P	P	P	P	P	P	P	P	P	P	P	(See Note 5)	
			C12W	--	P	P	P	P	P	P	P	P	P	P	P	(See Note 5)	
			C13N	--	--	P	P	P	P	P	P	P	P	P	P	(See Note 5)	
			C13NE	--	--	P	P	P	P	P	P	P	P	P	P	(See Note 5)	
			D13E	--	P	P	P	P	P	P	P	P	P	P	P	(See Note 5)	
			D13SW	--	P	P	P	P	P	P	P	P	P	P	P	(See Note 5)	
			EB-12	--	X	P	P	P	P	P	P	P	P	P	P	(See Note 5)	
C14 (▲)	15'	1.6	C13NE	Sampled as Delineation Location for C13													
			C14N	P	--	--	--	--	--	P	P	P	--	--	--	--	--
			C14S	--	--	--	--	--	--	P	P	P	--	--	--	--	--
			C15NW	Sampled as Delineation Location for C15													
C15 (▲)	17'	1.1	C15NE	--	--	P	P	P	P	P	P	P	H	--	--	--	--
			C15NW	--	--	P	P	P	P	P	P	P	H	--	--	--	--
			C15SE	--	--	P	P	P	P	P	P	P	H	--	--	--	--
			C15SW	--	--	P	P	P	P	P	P	P	H	--	--	--	--
C17 (▲)	17'	1.5	B17	X	X	X	X	X	X	X	X	X	X	X (19.6')	--	--	--
			C17NE	P	P	P	P	P	P	P	P	P	H	--	--	--	--
			C17NW	--	P	P	P	P	P	P	P	P	H	--	--	--	--
			C17S	--	P	P	P	P	P	P	P	P	H	--	--	--	--
C16 (Δ)	1'	1.4	C16	--	P	H	--	--	--	--	--	--	--	--	--	--	--
C18 (Δ)	1'	1.4[1.8]	C18	--	P	H	--	--	--	--	--	--	--	--	--	--	--

TABLE 2
PCB DELINEATION SAMPLING - MILL STREET SITE

FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1

GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples													
				0-1'	1-3'	3-5'	5-7'	7-9'	9-11'	11-13'	13-15'	15-17'	17-19'	19-21'	21-23'	23-25'	25-27'
C20 (Δ)	1'	1.2	C20	X	P	H	--	--	--	--	--	--	--	--	--	--	--
			C20E	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			C20N	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			C20S	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			C20SE	H	--	--	--	--	--	--	--	--	--	--	--	--	--
			C20SS	H	--	--	--	--	--	--	--	--	--	--	--	--	--
D04 (Δ)	1'	1.9	D04	X	P	H	--	--	--	--	--	--	--	--	--	--	--
			D04NE	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			D04SE	P	--	--	--	--	--	--	--	--	--	--	--	--	--
D05 (Δ)	1'	6.5	D05	X	P	H	--	--	--	--	--	--	--	--	--	--	--
D10 (Δ)	1'	20	D10	X	P	H	--	--	--	--	--	--	--	--	--	--	--
D15 (Δ)	1'	4,400	D15	X	P	H	--	--	--	--	--	--	--	--	--	--	--
D17 (▲)	1'	3	D17SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
E05 (▲)	5'	7.1	E05N	--	P	P	H	--	--	--	--	--	--	--	--	--	--
			E05E	--	P	P	H	--	--	--	--	--	--	--	--	--	--
			E05S	P	P	P	H	--	--	--	--	--	--	--	--	--	--
			E05W	P	P	P	H	--	--	--	--	--	--	--	--	--	--
E07 / EB-14 (▲)	5' / 6'	1.7 / 20	D07SE	Sampled as Delineation Location for D07													
			E07W	--	P	P	H	--	--	--	--	--	--	--	--	--	--
			EB-14	--	--	X (4' - 6')		P (6' - 8')	H (8' - 10')	X (12' - 16')			--	--	--	--	--
			EB-14SW	--	P	P	P (6')	H (6' - 8')	H (8' - 10')	--	--	--	--	--	--	--	--
			EB-14E	--	P	P	P (6')	H (6' - 8')	H (8' - 10')	--	--	--	--	--	--	--	--
E09 (▲)	3'	33	E09N	--	P	H	--	--	--	--	--	--	--	--	--	--	--
			E09E	--	P	H	--	--	--	--	--	--	--	--	--	--	--
			E09W	--	P	H	--	--	--	--	--	--	--	--	--	--	--
			F09	X	P	H	--	--	--	--	--	--	--	--	--	--	--
E11 (▲)	5'	3.6	E12	Sampled as Delineation Location for EB-13													
			EB-13S	Sampled as Delineation Location for EB-13													
			EB-13W	Sampled as Delineation Location for EB-21C													
			EB-21CW	Sampled as Delineation Location for EB-21C													
E13 (▲)	13'	2	E13E	--	P	P	P	P	P	P	H	--	--	--	--	--	--
			E13S	P	P	P	P	P	P	P	H	--	--	--	--	--	--
			E13SS	H	H	H	H	H	H	H	H	--	--	--	--	--	--
			E13W	--	P	P	P	P	P	P	H	--	--	--	--	--	--
			EB-12	Sampled as Delineation Location for D13													
E14 / SF-03G-1 / SF-02G-1 (Δ)	1'	1,500 / 20.2 / 1,100	E14S	--	P	H	--	--	--	--	--	--	--	--	--	--	--
			E14SE	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			E14SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
E15 (▲)	3'	64	D15	X	P	H	--	--	--	--	--	--	--	--	--	--	--
			E15SS	H	H	H	--	--	--	--	--	--	--	--	--	--	--
			EB-07A	--	P	H (4')	X (4' - 5.5')	--	--	--	--	--	--	--	--	--	--
			SS-12	X	P	H	--	--	--	--	--	--	--	--	--	--	--
			SF-01G	X	P	H	--	--	--	--	--	--	--	--	--	--	--
EB-12 (▲)	3'	26,700	D13E	Sampled as Delineation Location for D13													
			D13SW	Sampled as Delineation Location for D13													
			E13E	Sampled as Delineation Location for E13													
			E13W	Sampled as Delineation Location for E13													
			EB-12	Sampled as Delineation Location for D13													
EB-13 (▲)	16.5'	1.4	E11	X	X	X	X	X	X	X	X	X	X	X	21.8'	--	--
			EB-13	--	P	P	X	X (8.5')	P	P	P	X (16.5')	P (16.5' - 18.5')		H (18.5' - 20.5')		--
			EB-13S	P	P	P	P	P	P	P	P	P (16.5')	H (16.5' - 18.5')		H (18.5' - 20.5')		--
			EB-13SS	H	H	H	H	H	H	H	H	H (16.5')	H (16.5' - 18.5')		H (18.5' - 20.5')		--
			SF-05G-1	X	P	P	P	P	P	P	P	P (16.5')	H (16.5' - 18.5')		H (18.5' - 20.5')		--

TABLE 2
PCB DELINEATION SAMPLING - MILL STREET SITE

FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1

GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples													
				0-1'	*1-3'*	*3-5'*	*5-7'*	*7-9'*	*9-11'*	*11-13'*	*13-15'*	*15-17'*	*17-19'*	*19-21'*	*21-23'*	*23-25'*	*25-27'*
EB-21C (▲)	14'	190	C12SW	Sampled as Delineation Location for C12													
			D13SW	Sampled as Delineation Location for D13													
			E12	X	P	P (4')	P (4' - 6')	P (6' - 8')	P (8' - 10')	P (10' - 12')	P (12' - 14')	H (14' - 16')	H (16' - 18')	H (18' - 20')	H (20' - 22')	H (22' - 24')	H (24' - 26')
			EB-21C	X	X	X (4')	P (4' - 6')	P (6' - 8')	X (8' - 10')	P (10' - 12')	X (12' - 14')	P (14' - 16')	H (16' - 18')	H (18' - 20')	H (20' - 22')	H (22' - 24')	H (24' - 26')
			EB-21CW	--	P	P (4')	P (4' - 6')	P (6' - 8')	P (8' - 10')	P (10' - 12')	P (12' - 14')	H (14' - 16')	H (16' - 18')	H (18' - 20')	H (20' - 22')	H (22' - 24')	H (24' - 26')
F06 (Δ)	1'	7.8	F06	X	P	H	--	--	--	--	--	--	--	--	--	--	--
			F06SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
F07 (▲)	1'	6.4	F07SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
F08 (Δ)	1'	18	F08	X	P	H	--	--	--	--	--	--	--	--	--	--	--
			F08SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
F09 (Δ)	1'	17	F09	X	P	H	--	--	--	--	--	--	--	--	--	--	--
			F09SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
F010 (Δ)	1'	61	F10	X	P	H	--	--	--	--	--	--	--	--	--	--	--
			F10SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
SF-04G-1 (Δ)	1'	3.2	SF-04G-1	X	P	H	--	--	--	--	--	--	--	--	--	--	--
			SG-04G-1SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
SS-05 / SS-12 (ERE) (Δ)	1'	19 / 130	SS-05	X	P	H	--	--	--	--	--	--	--	--	--	--	--
			SS-05S	P	--	--	--	--	--	--	--	--	--	--	--	--	--
SS-12 (Δ)	1'	6.29	SS-12	X	P	H	--	--	--	--	--	--	--	--	--	--	--
			SS-12E	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			SS-12S	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			SS-12SE	H	--	--	--	--	--	--	--	--	--	--	--	--	--
SS-13 (Δ)	1'	7.6	E03	X	--	--	--	--	--	--	--	--	--	--	--	--	--
			SS-13	X	P	H	--	--	--	--	--	--	--	--	--	--	--
			SS-13NE	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			SS-13SE	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			SS-13SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
SS-14 (Δ)	1'	20.8	SS-14	X	P	H	--	--	--	--	--	--	--	--	--	--	--

Notes:
1. (Δ) indicates surface samples and (▲) indicates subsurface samples.
2. -- = No sample proposed for this depth increment.
3. Where indicated, samples for certain depth increments were collected to the depth indicated.
4. Due to recent demolition of this building, no survey is available at the proposed sample location. Upon mobilization, the proposed location will be surveyed and samples will be collected from the depth intervals corresponding to the 9- to 15-foot and 21- to 27-foot depth increments at soil boring C01.
5. Continuous soil sampling will be performed to bedrock at this location. The estimated depth of completion is based upon the depth of the boring subject to delineation.
6. The proposed depth of sampling at this location is based upon the elevation change associated with the elevated railbed.

Pre-Design Investigation Data Summary Tables

BBL®

BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Table 1

Elm Street Area PCB Surface Soil Data

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

TABLE 1
ELM STREET AREA PCB SURFACE SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
ESSB-A02	0 - 1	2/3/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.029 JP	ND(0.041)	0.029 J
ESSB-C02	0 - 1	2/3/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.11 P	0.097	ND(0.038)	0.20
ESSB-C04	0 - 1	2/4/2004	ND(0.46)	ND(0.46)	ND(0.46)	ND(0.46)	2.3	ND(0.46)	ND(0.46)	2.3
ESSB-E02	0 - 1	2/3/2004	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	1.1	ND(0.19)	ND(0.19)	1.1
ESSB-E04	0 - 1	2/5/2004	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	3.3	ND(0.21)	ND(0.21)	3.3
ESSB-E06	0 - 1	2/6/2004	ND(1.2)	ND(1.2)	ND(1.2)	ND(1.2)	8.3	ND(1.2)	ND(1.2)	8.3
ESSB-G04	0 - 1	2/3/2004	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	21	ND(1.0)	ND(1.0)	21
ESSB-G06	0 - 1	2/9/2004	ND(4.4)	ND(4.4)	ND(4.4)	ND(4.4)	54	ND(4.4)	ND(4.4)	54
ESSB-I04	0 - 1	2/2/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.30 BP	ND(0.038)	ND(0.038)	0.30 B
ESSB-I06	0 - 1	2/10/2004	ND(4.3) [ND(14)]	ND(4.3) [ND(14)]	ND(4.3) [ND(14)]	ND(4.3) [ND(14)]	64 [170]	ND(4.3) [ND(14)]	ND(4.3) [ND(14)]	64 [170]
ESSB-I08	0 - 1	2/11/2004	ND(59)	ND(59)	ND(59)	ND(59)	560	ND(59)	ND(59)	560
ESSB-J18	0 - 1	12/18/2003	ND(0.70)	ND(0.70)	ND(0.70)	ND(0.70)	7.7	ND(0.70)	ND(0.70)	7.7
ESSB-K06	0 - 1	2/2/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)
ESSB-K08	0 - 1	2/11/2004	ND(270)	ND(270)	ND(270)	ND(270)	4500	ND(270)	ND(270)	4500
ESSB-K10	0 - 1	2/11/2004	ND(250)	ND(250)	ND(250)	ND(250)	2900	ND(250)	ND(250)	2900
ESSB-K16	0 - 1	2/9/2004	ND(13)	ND(13)	ND(13)	ND(13)	130	ND(13)	ND(13)	130
ESSB-K18	0 - 1	12/18/2003	ND(3.6)	ND(3.6)	ND(3.6)	ND(3.6)	19	ND(3.6)	ND(3.6)	19
ESSB-L12	0 - 1	2/10/2004	ND(95)	ND(95)	ND(95)	ND(95)	240	110	ND(95)	360
ESSB-L14	0 - 1	2/10/2004	ND(36)	ND(36)	ND(36)	ND(36)	350	ND(36)	ND(36)	350
ESSB-M08	0 - 1	2/3/2004	ND(3.1)	ND(3.1)	ND(3.1)	ND(3.1)	57 P	ND(3.1)	ND(3.1)	57
ESSB-M10	0 - 1	2/5/2004	ND(5.2)	ND(5.2)	ND(5.2)	ND(5.2)	140	ND(5.2)	ND(5.2)	140
ESSB-M12	0 - 1	2/5/2004	ND(110)	ND(110)	ND(110)	ND(110)	1200	ND(110)	ND(110)	1200
ESSB-M14	0 - 1	12/22/2003	ND(380)	ND(380)	ND(380)	ND(380)	890	ND(380)	ND(380)	890
ESSB-M16	0 - 1	2/4/2004	ND(280)	ND(280)	ND(280)	ND(280)	5300	ND(280)	ND(280)	5300
ESSB-M18	0 - 1	2/4/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.40	ND(0.035)	ND(0.035)	0.40
ESSB-O10	0 - 1	1/29/2004	ND(4.0)	ND(4.0)	ND(4.0)	ND(4.0)	83	51	ND(4.0)	130
ESSB-O12	0 - 1	1/29/2004	ND(100)	ND(100)	ND(100)	ND(100)	1800	ND(100)	ND(100)	1800
ESSB-O14	0 - 1	2/2/2004	ND(180)	ND(180)	ND(180)	1900	ND(180)	ND(180)	ND(180)	1900
ESSB-O16	0 - 1	2/4/2004	ND(1.0) [ND(2.5)]	ND(1.0) [ND(2.5)]	ND(1.0) [ND(2.5)]	ND(1.0) [33]	15 [ND(2.5)]	ND(1.0) [ND(2.5)]	ND(1.0) [ND(2.5)]	15 [33]
ESSB-O18	0 - 1	1/28/2004	ND(3.7)	ND(3.7)	ND(3.7)	ND(3.7)	21	34	ND(3.7)	55
ESSB-Q10	0 - 1	1/27/2004	ND(5.1)	ND(5.1)	ND(5.1)	ND(5.1)	74	ND(5.1)	ND(5.1)	74
ESSB-Q12	0 - 1	1/29/2004	ND(160)	ND(160)	ND(160)	ND(160)	3000	ND(160)	ND(160)	3000
ESSB-Q14	0 - 1	1/22/2004	ND(260)	ND(260)	ND(260)	ND(260)	1800	1300	ND(260)	3100
ESSB-Q16	0 - 1	1/22/2004	ND(0.41)	ND(0.41)	ND(0.41)	ND(0.41)	3.4	5.2	ND(0.41)	8.6
ESSB-Q18	0 - 1	1/28/2004	ND(0.24)	ND(0.24)	ND(0.24)	ND(0.24)	0.56	1.1	ND(0.24)	1.7
ESSB-S12	0 - 1	1/26/2004	ND(3.9) [ND(5.2)]	ND(3.9) [ND(5.2)]	ND(3.9) [ND(5.2)]	ND(3.9) [ND(5.2)]	110 [92]	ND(3.9) [ND(5.2)]	ND(3.9) [ND(5.2)]	110 [92]
ESSB-S14	0 - 1	1/21/2004	ND(3.8)	ND(3.8)	ND(3.8)	ND(3.8)	37	36	ND(3.8)	73
ESSB-S16	0 - 1	1/21/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.14	0.21	ND(0.037)	0.36
ESSB-S18	0 - 1	1/21/2004	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	0.035 J [0.028 J]	0.033 J [0.027 JP]	ND(0.036) [ND(0.036)]	0.068 [0.054]
ESSB-S20	0 - 1	12/30/2003	ND(7.4)	ND(7.4)	ND(7.4)	ND(7.4)	50	ND(7.4)	ND(7.4)	50
ESSB-S22	0 - 1	1/21/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.44	0.31	ND(0.035)	0.75
ESSB-T16	0 - 1	12/23/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.20	0.14	ND(0.036)	0.35
ESSS-A01	0 - 1	12/22/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.045 P	ND(0.040)	0.045 P	0.090
ESSS-A03	0 - 1	12/22/2003	ND(0.049)	ND(0.049)	ND(0.049)	ND(0.049)	ND(0.049)	0.066	ND(0.049)	0.066
ESSS-B02	0 - 1	12/22/2003	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.050	ND(0.043)	0.050
ESSS-B03	0 - 1	12/22/2003	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.074	ND(0.043)	0.074
ESSS-B04	0 - 1	12/22/2003	ND(0.048)	ND(0.048)	ND(0.048)	ND(0.048)	ND(0.048)	0.26	ND(0.048)	0.26
ESSS-C01	0 - 1	1/30/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.13	0.15	ND(0.034)	0.28
ESSS-C03	0 - 1	12/22/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.078	ND(0.037)	0.078
ESSS-D00	0 - 1	2/11/2004	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	0.26 P	0.36	0.088	0.71

TABLE 1
ELM STREET AREA PCB SURFACE SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
ESSS-D01	0 - 1	1/30/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.033 J	0.032 J	ND(0.036)	0.065
ESSS-D02	0 - 1	12/22/2003	ND(0.085)	ND(0.085)	ND(0.085)	ND(0.085)	ND(0.085)	0.22	ND(0.085)	0.22
ESSS-D03	0 - 1	12/22/2003	ND(0.078)	ND(0.078)	ND(0.078)	ND(0.078)	ND(0.078)	0.85	ND(0.078)	0.85
ESSS-E01	0 - 1	1/30/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.013 J	0.043	ND(0.042)	0.056
ESSS-E03	0 - 1	12/22/2003	ND(0.37)	ND(0.37)	ND(0.37)	ND(0.37)	1.9	ND(0.37)	ND(0.37)	1.9
ESSS-F02	0 - 1	1/30/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.010 J	ND(0.034)	ND(0.034)	0.010 J
ESSS-F04	0 - 1	12/22/2003	ND(3.6) [ND(3.8)]	ND(3.6) [ND(3.8)]	ND(3.6) [ND(3.8)]	ND(3.6) [ND(3.8)]	38 [48]	ND(3.6) [ND(3.8)]	ND(3.6) [ND(3.8)]	38 [48]
ESSS-G03	0 - 1	1/30/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.025 J	0.010 J	ND(0.035)	0.035
ESSS-G05	0 - 1	12/5/2003	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	0.59	ND(0.18)	ND(0.18)	0.59
ESSS-H02	0 - 1	12/2/2003	ND(0.82)	ND(0.82)	ND(0.82)	ND(0.82)	2.0	ND(0.82)	ND(0.82)	2.0
ESSS-H03	0 - 1	12/2/2003	ND(4.0)	ND(4.0)	ND(4.0)	ND(4.0)	51	ND(4.0)	ND(4.0)	51
ESSS-H05	0 - 1	12/22/2003	ND(4.2)	ND(4.2)	ND(4.2)	ND(4.2)	43	ND(4.2)	ND(4.2)	43
ESSS-H06	0 - 1	12/5/2003	ND(0.14)	ND(0.14)	ND(0.14)	ND(0.14)	0.19	ND(0.14)	ND(0.14)	0.19
ESSS-I03	0 - 1	12/2/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.073 P	ND(0.038)	ND(0.038)	0.073 P
ESSS-I05	0 - 1	1/30/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.10	0.039	ND(0.035)	0.14
ESSS-I07	0 - 1	12/5/2003	ND(0.068)	ND(0.068)	ND(0.068)	ND(0.068)	0.17	ND(0.068)	ND(0.068)	0.17
ESSS-J03	0 - 1	12/2/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.032 J	ND(0.039)	ND(0.039)	0.032 J
ESSS-J04	0 - 1	12/2/2003	ND(0.081)	ND(0.081)	ND(0.081)	ND(0.081)	0.10	ND(0.081)	ND(0.081)	0.10
ESSS-J07	0 - 1	12/5/2003	ND(3.5)	ND(3.5)	ND(3.5)	ND(3.5)	27	ND(3.5)	ND(3.5)	27
ESSS-K05	0 - 1	12/2/2003	ND(0.41) [ND(0.40)]	ND(0.41) [ND(0.40)]	ND(0.41) [ND(0.40)]	ND(0.41) [ND(0.40)]	0.72 [0.58]	ND(0.41) [ND(0.40)]	ND(0.41) [ND(0.40)]	0.72 [0.58]
ESSS-L04	0 - 1	12/2/2003	ND(0.080)	ND(0.080)	ND(0.080)	ND(0.080)	0.14 P	ND(0.080)	ND(0.080)	0.14 P
ESSS-L06	0 - 1	12/10/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.048	0.044	ND(0.035)	0.091
ESSS-L15	0 - 1	1/28/2004	ND(11)	ND(11)	ND(11)	ND(11)	290	ND(11)	ND(11)	290
ESSS-L16	0 - 1	1/28/2004	ND(2.5)	ND(2.5)	ND(2.5)	ND(2.5)	58	34	ND(2.5)	93
ESSS-L17	0 - 1	1/28/2004	ND(2.8)	ND(2.8)	ND(2.8)	ND(2.8)	24	14	ND(2.8)	39
ESSS-L18	0 - 1	1/28/2004	ND(0.98)	ND(0.98)	ND(0.98)	ND(0.98)	16	ND(0.98)	ND(0.98)	16
ESSS-M05	0 - 1	12/2/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
ESSS-M07	0 - 1	12/10/2003	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	0.27	ND(0.18)	ND(0.18)	0.27
ESSS-M17	0 - 1	1/28/2004	ND(0.40)	ND(0.40)	ND(0.40)	ND(0.40)	12	ND(0.40)	ND(0.40)	12
ESSS-N06	0 - 1	12/2/2003	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.021 J	ND(0.041)	0.021 J
ESSS-N18	0 - 1	1/28/2004	ND(0.24)	ND(0.24)	ND(0.24)	ND(0.24)	1.1	0.75	ND(0.24)	1.9
ESSS-O07	0 - 1	12/10/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.082	ND(0.036)	0.082
ESSS-P07	0 - 1	12/10/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.023 J	ND(0.035)	ND(0.035)	0.023 J
ESSS-P08	0 - 1	12/10/2003	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	0.32	ND(0.045)	0.32
ESSS-P17	0 - 1	1/20/2004	ND(38)	ND(38)	ND(38)	ND(38)	120	ND(38)	ND(38)	120
ESSS-P18	0 - 1	1/28/2004	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	0.96	0.67	ND(0.18)	1.6
ESSS-Q09	0 - 1	12/10/2003	ND(1.4)	ND(1.4)	ND(1.4)	ND(1.4)	7.6	ND(1.4)	ND(1.4)	7.6
ESSS-Q17	0 - 1	1/20/2004	ND(0.91)	ND(0.91)	ND(0.91)	ND(0.91)	2.1	3.4	ND(0.91)	5.5
ESSS-R08	0 - 1	12/10/2003	ND(0.069)	ND(0.069)	ND(0.069)	0.48 P	ND(0.069)	ND(0.069)	ND(0.069)	0.48
ESSS-R09	0 - 1	12/10/2003	ND(3.4)	ND(3.4)	ND(3.4)	ND(3.4)	34	ND(3.4)	ND(3.4)	34
ESSS-R10	0 - 1	1/20/2004	ND(2.3)	ND(2.3)	ND(2.3)	ND(2.3)	9.8	ND(2.3)	ND(2.3)	9.8
ESSS-R11	0 - 1	1/20/2004	ND(21)	ND(21)	ND(21)	ND(21)	71	ND(21)	ND(21)	71
ESSS-R17	0 - 1	1/20/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.12	0.11	ND(0.034)	0.23
ESSS-R18	0 - 1	1/27/2004	ND(0.22)	ND(0.22)	ND(0.22)	ND(0.22)	0.55	0.50	ND(0.22)	1.0
ESSS-R19	0 - 1	1/27/2004	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	0.032 BJ	ND(0.033)	ND(0.033)	0.032 BJ
ESSS-R20	0 - 1	1/27/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.015 BJ	ND(0.035)	ND(0.035)	0.015 BJ
ESSS-R21	0 - 1	1/27/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.035 B	ND(0.034)	ND(0.034)	0.035 B
ESSS-R22	0 - 1	1/27/2004	ND(2.5)	ND(2.5)	ND(2.5)	ND(2.5)	44	20	ND(2.5)	64
ESSS-S11	0 - 1	1/19/2004	ND(38)	ND(38)	ND(38)	ND(38)	140	ND(38)	ND(38)	140
ESSS-S13	0 - 1	1/19/2004	ND(1.2)	ND(1.2)	ND(1.2)	ND(1.2)	21	17	ND(1.2)	39

TABLE 1
ELM STREET AREA PCB SURFACE SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
ESSS-S17	0 - 1	1/19/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.051	0.030 J	ND(0.034)	0.081
ESSS-T15	0 - 1	1/23/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.17 P	0.17	ND(0.036)	0.34
ESSS-T17	0 - 1	1/23/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.13 P	ND(0.034)	0.061	ND(0.034)	0.19
ESSS-T18	0 - 1	1/23/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.19 P	ND(0.038)	0.12	ND(0.038)	0.31
ESSS-T19	0 - 1	1/23/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.14 P	ND(0.036)	0.10	ND(0.036)	0.25
ESSS-T20	0 - 1	1/23/2004	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	1.3	0.88	ND(0.19)	2.2

Notes:
1. Samples were collected by Blasland, Bouck & Lee, Inc., and submitted to Severn Trent Laboratories, Inc. for analysis of PCBs.
2. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
3. In the areas where temporary cover materials have been placed (e.g., geotextile and soil cover), the 0- to 1-foot surface soil sampling interval will begin at the depth of the geotextile installed by EPA, which is considered to represent the boundary between clean barrier soils and native Site soils.
4. [ ] Indicates exceedance of Total PCB Surface Soil Criterion of 1 ppm.

Data Qualifiers:

J - Indicates an estimated value less than the practical quantitation limit (PQL).
P - Greater than 25% difference between primary and confirmation column.
B - Analyte was also detected in the associated method blank.

Table 2

Elm Street Area PCB Subsurface Soil Data

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

TABLE 2
ELM STREET AREA PCB SUBSURFACE SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
ESSB-A02	1 - 3	2/3/2004	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	0.18	ND(0.046)	ND(0.046)	0.18
	3 - 5	2/3/2004	ND(0.045) [ND(0.044)]	ND(0.045) [ND(0.044)]	ND(0.045) [ND(0.044)]	0.022 J [ND(0.044)]	ND(0.045) [0.018 J]	ND(0.045) [ND(0.044)]	ND(0.045) [ND(0.044)]	0.022 J [0.018 J]
	5 - 7	2/3/2004	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)
ESSB-C02	1 - 3	2/3/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)
	3 - 5	2/3/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)
ESSB-C04	1 - 3	2/4/2004	ND(0.42) [ND(0.33)]	ND(0.42) [ND(0.33)]	ND(0.42) [ND(0.33)]	ND(0.42) [ND(0.33)]	4.4 [3.2]	ND(0.42) [ND(0.33)]	ND(0.42) [ND(0.33)]	4.4 [3.2]
	3 - 5	2/4/2004	ND(0.31)	ND(0.31)	ND(0.31)	2.8	ND(0.31)	ND(0.31)	ND(0.31)	2.8
	5 - 7	2/4/2004	ND(0.30)	ND(0.30)	ND(0.30)	3.1	ND(0.30)	ND(0.30)	ND(0.30)	3.1
ESSB-E02	1 - 3	2/3/2004	ND(0.032)	ND(0.032)	ND(0.032)	ND(0.032)	0.011 J	ND(0.032)	ND(0.032)	0.011 J
	3 - 5	2/3/2004	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	0.084	ND(0.033)	ND(0.033)	0.084
	5 - 7	2/3/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.10	ND(0.035)	ND(0.035)	0.10
	7 - 9	2/3/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	0.021 J	ND(0.044)	ND(0.044)	0.021 J
	9 - 11	2/3/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)
	11 - 13	2/3/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)
ESSB-E04	1 - 3	2/5/2004	ND(0.035) [ND(0.035)]	ND(0.035) [ND(0.035)]	ND(0.035) [ND(0.035)]	ND(0.035) [ND(0.035)]	0.36 [0.44]	ND(0.035) [ND(0.035)]	ND(0.035) [ND(0.035)]	0.36 [0.44]
	3 - 5	2/5/2004	ND(2.3)	ND(2.3)	ND(2.3)	ND(2.3)	6.0	ND(2.3)	ND(2.3)	6.0
	5 - 7	2/5/2004	ND(0.20)	ND(0.20)	ND(0.20)	ND(0.20)	2.1	ND(0.20)	ND(0.20)	2.1
	7 - 9	2/5/2004	ND(11)	ND(11)	ND(11)	ND(11)	26	ND(11)	ND(11)	26
	9 - 11	2/5/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.29	ND(0.042)	ND(0.042)	0.29
ESSB-E06	1 - 3	2/6/2004	ND(1.2)	ND(1.2)	ND(1.2)	ND(1.2)	12	ND(1.2)	ND(1.2)	12
	3 - 5	2/6/2004	ND(1.9)	ND(1.9)	ND(1.9)	ND(1.9)	36	ND(1.9)	ND(1.9)	36
	5 - 7	2/6/2004	ND(0.44)	ND(0.44)	ND(0.44)	ND(0.44)	6.1	ND(0.44)	ND(0.44)	6.1
	7 - 9	2/6/2004	ND(1.4)	ND(1.4)	ND(1.4)	ND(1.4)	11	ND(1.4)	ND(1.4)	11
	9 - 11	2/6/2004	ND(3.9)	ND(3.9)	ND(3.9)	ND(3.9)	47	ND(3.9)	ND(3.9)	47
	11 - 13	2/6/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.046	ND(0.039)	ND(0.039)	0.046
ESSB-G04	1 - 3	2/3/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.22	ND(0.034)	ND(0.034)	ND(0.034)
	3 - 5	2/3/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.030 J	0.025 J	ND(0.034)	0.055
	5 - 7	2/3/2004	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]
	7 - 9	2/3/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.024 J	ND(0.035)	ND(0.035)	0.024 J
	9 - 11	2/3/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)
	11 - 13	2/3/2004	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)
	13 - 15	2/3/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)
ESSB-G06	1 - 3	2/9/2004	ND(4.0)	ND(4.0)	ND(4.0)	ND(4.0)	58	ND(4.0)	ND(4.0)	58
	3 - 5	2/9/2004	ND(4.8)	ND(4.8)	ND(4.8)	52	ND(4.8)	ND(4.8)	ND(4.8)	52
	5 - 7	2/9/2004	ND(4.3)	ND(4.3)	ND(4.3)	34	ND(4.3)	ND(4.3)	ND(4.3)	34
	7 - 9	2/9/2004	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	17	ND(1.0)	ND(1.0)	17
	9 - 11	2/9/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.58	ND(0.036)	ND(0.036)	0.58
	11 - 13	2/9/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.054	ND(0.037)	ND(0.037)	0.054
ESSB-I04	1 - 3	2/2/2004	ND(0.24)	ND(0.24)	ND(0.24)	ND(0.24)	0.98	0.64	ND(0.24)	1.6
	3 - 5	2/2/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.068 B	ND(0.035)	ND(0.035)	0.068 B
	5 - 7	2/2/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.017 BJP	ND(0.035)	ND(0.035)	0.017 BJ
	7 - 9	2/2/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.38 B	ND(0.034)	ND(0.034)	0.38 B
	9 - 11	2/2/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.044 B	ND(0.034)	ND(0.034)	0.044 B
	11 - 13	2/2/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.035 BJ	ND(0.042)	ND(0.042)	0.035 BJ
	13 - 15	2/2/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	0.037 BJ	ND(0.044)	ND(0.044)	0.037 BJ
ESSB-I06	1 - 3	2/10/2004	ND(130)	ND(130)	ND(130)	ND(130)	1300	ND(130)	ND(130)	1300
	3 - 5	2/10/2004	ND(0.93)	ND(0.93)	ND(0.93)	ND(0.93)	17	ND(0.93)	ND(0.93)	17
	5 - 7	2/10/2004	ND(1.1)	ND(1.1)	ND(1.1)	ND(1.1)	21	ND(1.1)	ND(1.1)	21
	7 - 9	2/10/2004	ND(24)	ND(24)	ND(24)	ND(24)	310	ND(24)	ND(24)	310
	9 - 11	2/10/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.18 P	ND(0.036)	ND(0.036)	0.18
	11 - 13	2/10/2004	ND(0.17)	ND(0.17)	ND(0.17)	ND(0.17)	1.4	ND(0.17)	ND(0.17)	1.4
	13 - 15	2/10/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.15 P	ND(0.038)	ND(0.038)	0.15

TABLE 2
ELM STREET AREA PCB SUBSURFACE SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
ESSB-I08	1 - 3	2/11/2004	ND(2.5)	ND(2.5)	ND(2.5)	ND(2.5)	58	ND(2.5)	ND(2.5)	58
	3 - 5	2/11/2004	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	0.89	ND(0.19)	ND(0.19)	0.89
	5 - 7	2/11/2004	ND(0.25) [ND(0.22)]	ND(0.25) [ND(0.22)]	ND(0.25) [ND(0.22)]	ND(0.25) [ND(0.22)]	3.4 [3.1]	ND(0.25) [ND(0.22)]	ND(0.25) [ND(0.22)]	3.4 [3.1]
	7 - 9	2/11/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.12	ND(0.035)	ND(0.035)	0.12
	9 - 11	2/11/2004	ND(5.4)	ND(5.4)	ND(5.4)	ND(5.4)	120	ND(5.4)	ND(5.4)	120
	11 - 13	2/11/2004	ND(1.2)	ND(1.2)	ND(1.2)	ND(1.2)	15	ND(1.2)	ND(1.2)	15
	13 - 15	2/11/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.071	ND(0.038)	ND(0.038)	0.071
ESSB-J18	1 - 3	12/18/2003	ND(1.9)	ND(1.9)	ND(1.9)	ND(1.9)	8.6	ND(1.9)	ND(1.9)	8.6
	3 - 5	12/18/2003	ND(0.23)	ND(0.23)	ND(0.23)	ND(0.23)	1.6	ND(0.23)	ND(0.23)	1.6
	5 - 7	12/18/2003	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	0.67	ND(0.18)	ND(0.18)	0.67
	7 - 9	12/18/2003	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	1.1	ND(0.18)	ND(0.18)	1.1
	11 - 13	12/18/2003	ND(6.8)	ND(6.8)	ND(6.8)	ND(6.8)	73	ND(6.8)	ND(6.8)	73
	13 - 15	12/18/2003	ND(0.068)	ND(0.068)	ND(0.068)	ND(0.068)	0.24	ND(0.068)	ND(0.068)	0.24
	15 - 17	12/18/2003	ND(6.9) [ND(3.4)]	ND(6.9) [ND(3.4)]	ND(6.9) [ND(3.4)]	ND(6.9) [ND(3.4)]	46 [30 B]	ND(6.9) [ND(3.4)]	ND(6.9) [ND(3.4)]	46 [30 B]
	17 - 19	12/18/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.33	ND(0.039)	ND(0.039)	0.33
	19 - 21	12/18/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.074	ND(0.037)	ND(0.037)	0.074
	21 - 23	12/18/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.069	ND(0.037)	ND(0.037)	0.069
ESSB-K06	1 - 3	2/2/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.042 B	ND(0.034)	ND(0.034)	0.042 B
	3 - 5	2/2/2004	ND(0.035) [ND(0.034)]	ND(0.035) [ND(0.034)]	ND(0.035) [ND(0.034)]	ND(0.035) [ND(0.034)]	0.026 BJ [0.031 BJ]	ND(0.035) [ND(0.034)]	ND(0.035) [ND(0.034)]	0.026 BJ [0.031 BJ]
	5 - 7	2/2/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.013 BJP	ND(0.035)	ND(0.035)	0.013 BJ
	7 - 9	2/2/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.0094 BJ	ND(0.035)	ND(0.035)	0.0094 BJ
	9 - 11	2/2/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)
	11 - 13	2/2/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.056 B	0.044 P	ND(0.035)	0.10 B
	13 - 15	2/2/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)
	15 - 17	2/2/2004	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.016 BJ	ND(0.043)	ND(0.043)	0.016 BJ
ESSB-K08	1 - 3	2/11/2004	ND(130)	ND(130)	ND(130)	ND(130)	1000	ND(130)	ND(130)	1000
	3 - 5	2/11/2004	ND(4.9) [ND(2.0)]	ND(4.9) [ND(2.0)]	ND(4.9) [ND(2.0)]	ND(4.9) [ND(2.0)]	47 [30]	20 [18]	ND(4.9) [ND(2.0)]	68 [48]
	5 - 7	2/11/2004	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	1.8	0.58	ND(0.21)	2.3
	7 - 9	2/11/2004	ND(0.25)	ND(0.25)	ND(0.25)	ND(0.25)	0.99	0.42	ND(0.25)	1.4
	9 - 11	2/11/2004	ND(0.27)	ND(0.27)	ND(0.27)	ND(0.27)	0.76	ND(0.27)	ND(0.27)	0.76
	11 - 13	2/11/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	0.15	0.091 P	ND(0.044)	0.24
	13 - 15	2/11/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.034 J	0.0099 JP	ND(0.036)	0.044
	15 - 17	2/11/2004	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)
	17 - 19	2/11/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.14	ND(0.038)	ND(0.038)	0.14
ESSB-K10	1 - 3	2/11/2004	ND(4.4)	ND(4.4)	ND(4.4)	ND(4.4)	50	ND(4.4)	ND(4.4)	50
	3 - 5	2/11/2004	ND(1.0)	ND(1.0)	ND(1.0)	ND(1.0)	7.4	ND(1.0)	ND(1.0)	7.4
	5 - 7	2/11/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.064	ND(0.037)	ND(0.037)	0.064
	7 - 9	2/11/2004	ND(0.24)	ND(0.24)	ND(0.24)	ND(0.24)	4.0 P	0.62	ND(0.24)	4.6
	9 - 11	2/11/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.037 P	ND(0.036)	ND(0.036)	0.037
	11 - 13	2/11/2004	ND(0.26)	ND(0.26)	ND(0.26)	ND(0.26)	2.1	ND(0.26)	ND(0.26)	2.1
	13 - 15	2/11/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.051	ND(0.038)	ND(0.038)	0.051
	15 - 17	2/11/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.16	0.094 P	ND(0.036)	0.25
	17 - 19	2/11/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.036 J	ND(0.041)	ND(0.041)	0.036 J
ESSB-K16	1 - 3	2/9/2004	ND(5.0)	ND(5.0)	ND(5.0)	ND(5.0)	62	ND(5.0)	ND(5.0)	62
	3 - 5	2/9/2004	ND(0.20)	ND(0.20)	ND(0.20)	ND(0.20)	2.4	ND(0.20)	ND(0.20)	2.4
	5 - 7	2/9/2004	ND(0.20)	ND(0.20)	ND(0.20)	ND(0.20)	4.3	ND(0.20)	ND(0.20)	4.3
	7 - 9	2/9/2004	ND(0.22)	ND(0.22)	ND(0.22)	ND(0.22)	1.7	ND(0.22)	ND(0.22)	1.7
	9 - 11	2/9/2004	ND(22)	ND(22)	ND(22)	ND(22)	190	ND(22)	ND(22)	190
	11 - 13	2/9/2004	ND(0.22)	ND(0.22)	ND(0.22)	ND(0.22)	1.7	0.98	ND(0.22)	2.7
	13 - 15	2/9/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.14 P	ND(0.036)	ND(0.036)	0.14
	15 - 17	2/9/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.64	ND(0.037)	ND(0.037)	0.64
	17 - 19	2/9/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.048 P	ND(0.039)	ND(0.039)	0.048
	19 - 21	2/9/2004	ND(1.4)	ND(1.4)	ND(1.4)	22	ND(1.4)	ND(1.4)	1.7	24
	21 - 23	2/9/2004	ND(14)	ND(14)	ND(14)	140	ND(14)	ND(14)	6.8 J	140

TABLE 2
ELM STREET AREA PCB SUBSURFACE SOIL DATA

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GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
ESSB-K18	1 - 2	12/18/2003	ND(0.78)	ND(0.78)	ND(0.78)	ND(0.78)	6.0	ND(0.78)	ND(0.78)	6.0
	2 - 4	12/18/2003	ND(1.9)	ND(1.9)	ND(1.9)	ND(1.9)	6.1	ND(1.9)	ND(1.9)	6.1
	4 - 6	12/18/2003	ND(40)	ND(40)	ND(40)	ND(40)	490	ND(40)	ND(40)	490
	6 - 8	12/18/2003	ND(8.1)	ND(8.1)	ND(8.1)	ND(8.1)	110	ND(8.1)	ND(8.1)	110
	8 - 10	12/18/2003	ND(3.4)	ND(3.4)	ND(3.4)	ND(3.4)	28	ND(3.4)	ND(3.4)	28
	10 - 12	12/18/2003	ND(6.8)	ND(6.8)	ND(6.8)	ND(6.8)	150	ND(6.8)	ND(6.8)	150
	12 - 14	12/18/2003	ND(7.0)	ND(7.0)	ND(7.0)	ND(7.0)	38	31	ND(7.0)	70
	14 - 16	12/18/2003	ND(7.4)	ND(7.4)	ND(7.4)	ND(7.4)	65	29	ND(7.4)	94
ESSB-L12	1 - 3	2/10/2004	ND(10)	ND(10)	ND(10)	ND(10)	140	ND(10)	ND(10)	140
	3 - 5	2/10/2004	ND(1.1)	ND(1.1)	ND(1.1)	ND(1.1)	40	ND(1.1)	ND(1.1)	40
	5 - 7	2/10/2004	ND(2.4)	ND(2.4)	ND(2.4)	ND(2.4)	44	ND(2.4)	ND(2.4)	44
	7 - 9	2/10/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.26	0.15	ND(0.042)	0.42
	9 - 11	2/10/2004	ND(5.9)	ND(5.9)	ND(5.9)	ND(5.9)	52	ND(5.9)	ND(5.9)	52
	11 - 13	2/10/2004	ND(3.9)	ND(3.9)	ND(3.9)	ND(3.9)	58	ND(3.9)	ND(3.9)	58
	13 - 15	2/10/2004	ND(2.8)	ND(2.8)	ND(2.8)	ND(2.8)	22	18	ND(2.8)	40
	15 - 17	2/10/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.14	0.094	ND(0.040)	0.23
	17 - 19	2/10/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.17	0.062	ND(0.040)	0.23
ESSB-L14	1 - 3	2/10/2004	ND(230)	ND(230)	ND(230)	ND(230)	7200	ND(230)	ND(230)	7200
	3 - 5	2/10/2004	ND(0.96)	ND(0.96)	ND(0.96)	ND(0.96)	23	ND(0.96)	ND(0.96)	23
	5 - 7	2/10/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.44 P	ND(0.034)	ND(0.034)	0.44
	7 - 9	2/10/2004	ND(0.44)	ND(0.44)	ND(0.44)	ND(0.44)	6.7	3.4	ND(0.44)	10
	9 - 11	2/10/2004	ND(0.47)	ND(0.47)	ND(0.47)	ND(0.47)	4.5	2.2	ND(0.47)	6.7
ESSB-M08	1 - 3	2/3/2004	ND(0.46)	ND(0.46)	ND(0.46)	ND(0.46)	7.2	ND(0.46)	ND(0.46)	7.2
	3 - 5	2/3/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.079	ND(0.037)	ND(0.037)	0.079
	5 - 7	2/3/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.080	ND(0.036)	ND(0.036)	0.080
	7 - 9	2/3/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.035 J	ND(0.036)	ND(0.036)	0.035 J
	9 - 11	2/3/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)
	11 - 13	2/3/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)
	13 - 15	2/3/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)
	15 - 16	2/3/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)
	20 - 22	2/3/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.024 JP	ND(0.039)	ND(0.039)	0.024 J
ESSB-M10	1 - 3	2/5/2004	ND(0.23)	ND(0.23)	ND(0.23)	ND(0.23)	2.2	0.73	ND(0.23)	2.9
	3 - 5	2/5/2004	ND(0.22)	ND(0.22)	ND(0.22)	ND(0.22)	1.5	0.99	ND(0.22)	2.5
ESSB-M12	1 - 3	2/5/2004	ND(7.4) [ND(9.5)]	ND(7.4) [ND(9.5)]	ND(7.4) [ND(9.5)]	ND(7.4) [ND(9.5)]	52 [77]	26 [35]	ND(7.4) [ND(9.5)]	78 [110]
	3 - 5	2/5/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.36	0.14 P	ND(0.038)	0.50
	5 - 7	2/5/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.23	0.077 P	ND(0.042)	0.31
	7 - 9	2/5/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	0.29	0.16	ND(0.044)	0.45
	9 - 11	2/5/2004	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	0.27	0.18	ND(0.045)	0.45
	11 - 13	2/5/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.034 J	ND(0.036)	ND(0.036)	0.034 J
	13 - 15	2/5/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
	15 - 17	2/5/2004	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	1.8	ND(0.19)	ND(0.19)	1.8
	17 - 19	2/5/2004	ND(0.28)	ND(0.28)	ND(0.28)	ND(0.28)	ND(0.28)	ND(0.28)	ND(0.28)	ND(0.28)
	19 - 21	2/5/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.38	ND(0.038)	ND(0.038)	ND(0.038)	0.38
	21 - 23	2/5/2004	ND(0.24)	ND(0.24)	ND(0.24)	2.7	ND(0.24)	ND(0.24)	ND(0.24)	2.7
ESSB-M14	1 - 3	12/22/2003	ND(200)	ND(200)	ND(200)	ND(200)	84 J	ND(200)	ND(200)	84 J
	3 - 5	12/22/2003	ND(0.73)	ND(0.73)	ND(0.73)	ND(0.73)	5.7	3.7	ND(0.73)	9.4
	5 - 7	12/22/2003	ND(39)	ND(39)	ND(39)	ND(39)	80	ND(39)	ND(39)	80
	7 - 9	12/22/2003	ND(3.8)	ND(3.8)	ND(3.8)	ND(3.8)	21	ND(3.8)	ND(3.8)	21
	9 - 11	12/22/2003	ND(0.074) [ND(3.8)]	ND(0.074) [ND(3.8)]	ND(0.074) [ND(3.8)]	ND(0.074) [ND(3.8)]	0.74 [19]	ND(0.074) [ND(3.8)]	ND(0.074) [ND(3.8)]	0.74 [19]
	11 - 13	12/22/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.39	ND(0.038)	ND(0.038)	0.39
	13 - 15	12/22/2003	ND(0.73)	ND(0.73)	ND(0.73)	ND(0.73)	2.8	ND(0.73)	ND(0.73)	2.8
	16 - 18	12/22/2003	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	0.14	0.094	ND(0.046)	0.24
	18 - 20	12/22/2003	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.14	0.12	ND(0.043)	0.25
	20 - 22	12/22/2003	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.025 J	0.027 J	ND(0.041)	0.051

TABLE 2
ELM STREET AREA PCB SUBSURFACE SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
ESSB-M16	1 - 2	2/4/2004	ND(2.6)	ND(2.6)	ND(2.6)	ND(2.6)	31	ND(2.6)	ND(2.6)	31
	2 - 4	2/4/2004	ND(1.7)	ND(1.7)	ND(1.7)	ND(1.7)	11	ND(1.7)	ND(1.7)	11
	4 - 6	2/4/2004	ND(5.5)	ND(5.5)	ND(5.5)	ND(5.5)	67	19	ND(5.5)	86
	6 - 8	2/4/2004	ND(4.3)	ND(4.3)	ND(4.3)	ND(4.3)	42	ND(4.3)	ND(4.3)	42
	8 - 10	2/4/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.20	0.049	ND(0.035)	0.25
	10 - 12	2/4/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.32	0.15	ND(0.036)	0.47
	12 - 14	2/4/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.087	0.028 J	ND(0.036)	0.12
	14 - 16	2/4/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	0.67	0.70 P	ND(0.044)	1.4
	16 - 18	2/4/2004	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.23	0.53 P	ND(0.043)	0.75
ESSB-M18	1 - 3	2/4/2004	ND(2.3)	ND(2.3)	ND(2.3)	ND(2.3)	60 P	36	ND(2.3)	96
	3 - 5	2/4/2004	ND(92)	ND(92)	ND(92)	ND(92)	580	ND(92)	ND(92)	580
	5 - 7	2/4/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.29	0.11	ND(0.037)	0.40
	7 - 9	2/4/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.12	ND(0.037)	ND(0.037)	0.12
	9 - 11	2/4/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.024 J	ND(0.036)	ND(0.036)	0.024 J
	11 - 13	2/4/2004	ND(0.22)	ND(0.22)	ND(0.22)	ND(0.22)	1.8	1.0	ND(0.22)	2.8
	13 - 15	2/4/2004	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	1.1 P	0.57	ND(0.19)	1.7
	15 - 17	2/4/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.014 J	ND(0.034)	ND(0.034)	0.014 J
	17 - 19	2/4/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.0096 J	ND(0.036)	ND(0.036)	0.0096 J
	19 - 21	2/4/2004	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)	ND(0.047)
	21 - 23	2/4/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)
ESSB-O10	1 - 3	1/29/2004	ND(0.58)	ND(0.58)	ND(0.58)	ND(0.58)	14	9.9	ND(0.58)	23
	3 - 5	1/29/2004	ND(0.20)	ND(0.20)	ND(0.20)	ND(0.20)	4.2	3.6	ND(0.20)	7.8
	5 - 7	1/29/2004	ND(0.20) [ND(2.0)]	ND(0.20) [ND(2.0)]	ND(0.20) [ND(2.0)]	ND(0.20) [ND(2.0)]	8.6 [20]	5.8 [14]	ND(0.20) [ND(2.0)]	14 [34]
	7 - 9	1/29/2004	ND(2.0)	ND(2.0)	ND(2.0)	ND(2.0)	30	16	ND(2.0)	46
	9 - 11	1/29/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.022 JP	ND(0.036)	ND(0.036)	0.022 J
	11 - 13	1/29/2004	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	0.13	ND(0.046)	0.014 JP	0.15
	13 - 15	1/29/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.044	ND(0.037)	ND(0.037)	0.044
	15 - 17	1/29/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.030 J	ND(0.037)	ND(0.037)	0.030 J
	17 - 19	1/29/2004	ND(0.058)	ND(0.058)	ND(0.058)	ND(0.058)	0.024 JP	ND(0.058)	ND(0.058)	0.024 J
	19 - 21	1/29/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.021 J	0.030 J	ND(0.042)	0.051
	21 - 23	1/29/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)
ESSB-O12	1 - 3	1/29/2004	ND(4.6)	ND(4.6)	ND(4.6)	ND(4.6)	92	ND(4.6)	ND(4.6)	92
	3 - 5	1/29/2004	ND(1.2)	ND(1.2)	ND(1.2)	ND(1.2)	8.7	5.7	ND(1.2)	14
	5 - 7	1/29/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.032 BJ	0.020 J	ND(0.034)	0.052 B
	7 - 9	1/29/2004	ND(0.40)	ND(0.40)	ND(0.40)	ND(0.40)	6.6	4.2	ND(0.40)	11
	9 - 11	1/29/2004	ND(0.22) [ND(0.036)]	ND(0.22) [ND(0.036)]	ND(0.22) [ND(0.036)]	ND(0.22) [ND(0.036)]	1.3 [0.14 B]	0.90 [0.098]	ND(0.22) [ND(0.036)]	2.2 [0.23 B]
	11 - 13	1/29/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.11 B	0.090	ND(0.035)	0.20 B
	13 - 15	1/29/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)
	15 - 17	1/29/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.21 B	0.12	ND(0.038)	0.33 B
	17 - 19	1/29/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.080 B	ND(0.038)	0.0092 JP	0.090 B
	19 - 21	1/29/2004	ND(0.049)	ND(0.049)	ND(0.049)	ND(0.049)	0.81 B	0.38 P	ND(0.049)	1.2 B
ESSB-O14	1 - 3	2/2/2004	ND(2100) [ND(880)]	ND(2100) [ND(880)]	ND(2100) [ND(880)]	17000 [12000]	ND(2100) [ND(880)]	ND(2100) [ND(880)]	ND(2100) [ND(880)]	17000 [12000]
	3 - 5	2/2/2004	ND(980)	ND(980)	ND(980)	16000	ND(980)	ND(980)	ND(980)	16000
	5 - 7	2/2/2004	ND(5600)	ND(5600)	ND(5600)	40000	ND(5600)	ND(5600)	ND(5600)	40000
	7 - 9	2/2/2004	ND(56)	ND(56)	ND(56)	240	ND(56)	ND(56)	ND(56)	240
	9 - 11	2/2/2004	ND(46)	ND(46)	ND(46)	490	ND(46)	ND(46)	ND(46)	490
	11 - 13	2/2/2004	ND(2.1)	ND(2.1)	ND(2.1)	19	ND(2.1)	ND(2.1)	ND(2.1)	19
	15 - 17	2/2/2004	ND(13)	ND(13)	ND(13)	150	ND(13)	ND(13)	ND(13)	150
	17 - 19	2/2/2004	ND(2.2)	ND(2.2)	ND(2.2)	19	ND(2.2)	ND(2.2)	ND(2.2)	19
	19 - 21	2/2/2004	ND(0.27)	ND(0.27)	ND(0.27)	1.2	ND(0.27)	ND(0.27)	ND(0.27)	1.2
	21 - 23	2/2/2004	ND(0.24)	ND(0.24)	ND(0.24)	1.2	ND(0.24)	ND(0.24)	ND(0.24)	1.2

TABLE 2
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(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
ESSB-O16	1 - 3	2/4/2004	ND(200)	ND(200)	ND(200)	4600	ND(200)	ND(200)	ND(200)	4600
	3 - 5	2/4/2004	ND(100)	ND(100)	ND(100)	540	ND(100)	ND(100)	ND(100)	540
	5 - 7	2/4/2004	ND(0.23)	ND(0.23)	ND(0.23)	1.3	ND(0.23)	ND(0.23)	ND(0.23)	1.3
	7 - 9	2/4/2004	ND(23)	ND(23)	ND(23)	190	ND(23)	ND(23)	ND(23)	190
	9 - 11	2/4/2004	ND(0.21)	ND(0.21)	ND(0.21)	0.87	ND(0.21)	ND(0.21)	ND(0.21)	0.87
	11 - 13	2/4/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.045	ND(0.036)	ND(0.036)	ND(0.036)	0.045
	13 - 15	2/4/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.020 JP	ND(0.034)	ND(0.034)	ND(0.034)	0.020 J
	15 - 17	2/4/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.036 J	ND(0.037)	ND(0.037)	0.036 J
	17 - 19	2/4/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.049	ND(0.040)	ND(0.040)	0.049
	19 - 21	2/4/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	0.21 P	0.19 P	ND(0.044)	0.40
	21 - 23	2/4/2004	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)
ESSB-O18	1 - 2	1/28/2004	ND(53)	ND(53)	ND(53)	ND(53)	810	1000	ND(53)	1800
	2 - 4	1/28/2004	ND(54)	ND(54)	ND(54)	ND(54)	1300	1300	ND(54)	2700
	4 - 6	1/28/2004	ND(40)	ND(40)	ND(40)	ND(40)	1000	1100	ND(40)	2100
	6 - 8	1/28/2004	ND(40)	ND(40)	ND(40)	ND(40)	220	230	ND(40)	450
	8 - 10	1/28/2004	ND(0.23)	ND(0.23)	ND(0.23)	ND(0.23)	1.3	1.2	ND(0.23)	2.5
	10 - 12	1/28/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.54 B	0.40	ND(0.035)	0.93 B
	12 - 14	1/28/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.030 BJ	0.018 J	ND(0.039)	0.048 B
	14 - 16	1/28/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.043 BP	0.043	ND(0.035)	0.086 B
	16 - 18	1/28/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
	18 - 20	1/28/2004	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	0.027 BJ	0.030 J	ND(0.033)	0.056 B
	20 - 22	1/28/2004	ND(0.039) [ND(0.039)]	ND(0.039) [ND(0.039)]	ND(0.039) [ND(0.039)]	ND(0.039) [ND(0.039)]	0.010 BJP [ND(0.039)]	ND(0.039) [ND(0.039)]	ND(0.039) [ND(0.039)]	0.010 BJ [ND(0.039)]
ESSB-Q10	1 - 3	1/27/2004	ND(0.25)	ND(0.25)	ND(0.25)	ND(0.25)	1.0	0.52	ND(0.25)	1.5
	3 - 5	1/27/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.16 B	0.064	ND(0.034)	0.22 B
	5 - 7	1/27/2004	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	0.14 B	0.056	ND(0.033)	0.19 B
	7 - 9	1/27/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.011 BJ	ND(0.034)	ND(0.034)	0.011 BJ
	9 - 11	1/27/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)
	11 - 13	1/27/2004	ND(0.051)	ND(0.051)	ND(0.051)	ND(0.051)	0.037 BJ	ND(0.051)	ND(0.051)	0.037 BJ
	13 - 15	1/27/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.012 BJP	ND(0.042)	ND(0.042)	0.012 BJ
	15 - 17	1/27/2004	ND(0.046)	ND(0.046)	ND(0.046)	ND(0.046)	0.40 B	0.33	ND(0.046)	0.72 B
	17 - 19	1/27/2004	ND(0.34)	ND(0.34)	ND(0.34)	ND(0.34)	1.4 P	1.1	ND(0.34)	2.5
	19 - 21	1/27/2004	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	0.56	0.42	ND(0.19)	0.98
ESSB-Q12	1 - 2	1/29/2004	ND(12)	ND(12)	ND(12)	ND(12)	150	92	ND(12)	240
	2 - 4	1/29/2004	ND(11)	ND(11)	ND(11)	ND(11)	130	ND(11)	ND(11)	130
	4 - 6	1/29/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.043	0.033 J	ND(0.037)	0.076
	6 - 8	1/29/2004	ND(0.23)	ND(0.23)	ND(0.23)	ND(0.23)	1.8	0.88	ND(0.23)	2.6
	8 - 10	1/29/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	0.13	0.055	ND(0.044)	0.19
	10 - 12	1/29/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.094	ND(0.034)	ND(0.034)	0.094
	12 - 14	1/29/2004	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.012 JP	ND(0.043)	ND(0.043)	0.012 J
	14 - 16	1/29/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.17	0.18	ND(0.041)	0.34
	16 - 18	1/29/2004	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.029 J	0.043	ND(0.043)	0.072
	18 - 20	1/29/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.14	0.065	ND(0.038)	0.20
	20 - 22	1/29/2004	ND(0.044)	ND(0.044)	ND(0.044)	ND(0.044)	0.020 J	ND(0.044)	ND(0.044)	0.020 J
ESSB-Q14	1 - 3	1/22/2004	ND(270)	ND(270)	ND(270)	ND(270)	5800	3300	ND(270)	9100
	3 - 5	1/22/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.12	0.042	ND(0.036)	0.16
	5 - 7	1/22/2004	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	0.064 [0.053]	0.037 [0.026 JP]	ND(0.036) [ND(0.036)]	0.10 [0.079]
	11 - 13	1/22/2004	ND(2.5)	ND(2.5)	ND(2.5)	ND(2.5)	26	18	ND(2.5)	44
	13 - 15	1/22/2004	ND(0.27)	ND(0.27)	ND(0.27)	ND(0.27)	3.0	2.2	ND(0.27)	5.2
ESSB-Q16	1 - 3	1/22/2004	ND(2.2)	ND(2.2)	ND(2.2)	ND(2.2)	ND(2.2)	24	ND(2.2)	24
	3 - 5	1/22/2004	ND(1.2) [ND(1.2)]	ND(1.2) [ND(1.2)]	ND(1.2) [ND(1.2)]	ND(1.2) [ND(1.2)]	9.3 [12]	13 [19]	ND(1.2) [ND(1.2)]	22 [31]
	5 - 7	1/22/2004	ND(5.0)	ND(5.0)	ND(5.0)	ND(5.0)	18	38	ND(5.0)	56

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Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
ESSB-Q18	1 - 3	1/28/2004	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	0.036 B	0.038	ND(0.033)	0.073 B
	3 - 5	1/28/2004	ND(0.034) [ND(0.036)]	ND(0.034) [ND(0.036)]	ND(0.034) [ND(0.036)]	ND(0.034) [ND(0.036)]	0.014 BJ [ND(0.036)]	0.0097 JP [ND(0.036)]	ND(0.034) [ND(0.036)]	0.024 BJ [ND(0.036)]
	5 - 7	1/28/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)
	7 - 9	1/28/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.016 J	ND(0.036)	0.014 JP	ND(0.036)	0.030 BJ
	9 - 11	1/28/2004	ND(0.035)	ND(0.035)	ND(0.035)	0.014 J	ND(0.035)	ND(0.035)	ND(0.035)	0.014 BJ
	11 - 13	1/28/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.024 JP	ND(0.036)	0.019 J	ND(0.036)	0.042 B
	13 - 15	1/28/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.012 BJ	ND(0.037)	ND(0.037)	0.012 BJ
	15 - 17	1/28/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.029 BJ	0.024 J	ND(0.042)	0.053 B
ESSB-S12	1 - 3	1/26/2004	ND(0.24)	ND(0.24)	ND(0.24)	ND(0.24)	1.3	ND(0.24)	ND(0.24)	1.3
	3 - 5	1/26/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.23	ND(0.036)	ND(0.036)	0.23
	5 - 7	1/26/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.091	ND(0.037)	ND(0.037)	0.091
	7 - 9	1/26/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.051	ND(0.035)	ND(0.035)	0.051
	9 - 11	1/26/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.050	ND(0.035)	ND(0.035)	0.050
	11 - 13	1/26/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.11	ND(0.037)	ND(0.037)	0.11
	13 - 15	1/26/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.089	ND(0.036)	ND(0.036)	0.089
	15 - 17	1/26/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.084	ND(0.040)	ND(0.040)	0.084
	17 - 19	1/26/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.050	ND(0.040)	ND(0.040)	0.050
ESSB-S14	1 - 3	1/21/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.018 J	0.013 JP	ND(0.037)	0.032 J
	3 - 5	1/21/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.0090 J	ND(0.034)	ND(0.034)	0.0090 J
	5 - 7	1/21/2004	ND(4.8)	ND(4.8)	ND(4.8)	ND(4.8)	ND(4.8)	43	ND(4.8)	43
	7 - 9	1/21/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.019 J	0.026 J	ND(0.035)	0.046
	9 - 11	1/21/2004	ND(0.26)	ND(0.26)	ND(0.26)	ND(0.26)	5.0	5.0	ND(0.26)	10
	11 - 13	1/21/2004	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)
	13 - 15	1/21/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.080	0.063	ND(0.035)	0.14
	15 - 17	1/21/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.011 J	0.011 J	ND(0.035)	0.022 J
	17 - 19	1/21/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.029 J	0.022 J	ND(0.041)	0.051
	19 - 20	1/21/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.031 J	0.024 J	ND(0.041)	0.056
ESSB-S16	1 - 3	1/21/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.030 J	ND(0.038)	ND(0.038)	0.030 J
	3 - 5	1/21/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.082	0.066	ND(0.041)	0.15
	5 - 7	1/21/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.031 J	0.012 JP	ND(0.039)	0.044
	7 - 9	1/21/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.15	0.062	ND(0.037)	0.21
	9 - 11	1/21/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.26	0.12	ND(0.034)	0.37
	11 - 13	1/21/2004	ND(0.20)	ND(0.20)	ND(0.20)	ND(0.20)	2.9	ND(0.20)	ND(0.20)	2.9
	13 - 15	1/21/2004	ND(0.25)	ND(0.25)	ND(0.25)	ND(0.25)	2.7	ND(0.25)	ND(0.25)	2.7
	15 - 17	1/21/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.22	0.070	ND(0.041)	0.29
ESSB-S18	1 - 3	1/21/2004	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)
	3 - 5	1/21/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)
	5 - 7	1/21/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)
	7 - 9	1/21/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
	9 - 11	1/21/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.0094 J	ND(0.035)	ND(0.035)	0.0094 J
	11 - 1	1/21/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.072	ND(0.037)	ND(0.037)	0.072
ESSB-S20	1 - 3	12/30/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.088	ND(0.038)	ND(0.038)	0.088
	3 - 5	12/30/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.076	ND(0.036)	ND(0.036)	0.076
	5 - 7	12/31/2003	ND(0.037)	ND(0.037)	ND(0.037)	0.050 BP	ND(0.037)	ND(0.037)	ND(0.037)	0.050 B
	7 - 9	12/30/2003	ND(0.035) [ND(0.035)]	ND(0.035) [ND(0.035)]	ND(0.035) [ND(0.035)]	ND(0.035) [ND(0.035)]	0.042 [0.031 J]	ND(0.035) [ND(0.035)]	ND(0.035) [ND(0.035)]	0.042 [0.031 J]
	9 - 11	12/30/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.068	ND(0.035)	ND(0.035)	0.068
	11 - 13	12/30/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.11	ND(0.038)	ND(0.038)	0.11
	13 - 15	12/30/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.057	ND(0.039)	ND(0.039)	0.057

TABLE 2
ELM STREET AREA PCB SUBSURFACE SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
ESSB-S22	1 - 3	1/21/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.0093 J	ND(0.035)	ND(0.035)	0.0093 J
	3 - 5	1/21/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.0095 J	ND(0.034)	ND(0.034)	0.0095 J
	5 - 7	1/21/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)
	7 - 9	1/21/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.097	ND(0.035)	ND(0.035)	0.097
	9 - 11	1/21/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)
	11 - 13	1/21/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.045	ND(0.035)	ND(0.035)	0.045
	13 - 15	1/21/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.13	ND(0.038)	ND(0.038)	0.13
	15 - 17	1/21/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.038 J	ND(0.041)	ND(0.041)	0.038 J
ESSB-T16	1 - 3	12/29/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.028 J	0.026 J	ND(0.036)	0.053
	3 - 5	12/23/2003	ND(0.19)	ND(0.19)	ND(0.19)	ND(0.19)	0.91	0.44	ND(0.19)	1.4
	5 - 7	12/23/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.028 J	ND(0.036)	ND(0.036)	0.028 J
	7 - 9	12/23/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.035 J	0.021 J	ND(0.036)	0.056
	9 - 11	12/23/2003	ND(0.078)	ND(0.078)	ND(0.078)	ND(0.078)	0.68	ND(0.078)	ND(0.078)	0.68
	11 - 13	12/23/2003	ND(3.7)	ND(3.7)	ND(3.7)	ND(3.7)	6.4	ND(3.7)	ND(3.7)	6.4
	13 - 15	12/29/2003	ND(0.073)	ND(0.073)	ND(0.073)	ND(0.073)	0.44	ND(0.073)	ND(0.073)	0.44
	15 - 17	12/29/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.20	ND(0.036)	ND(0.036)	0.20
	17 - 19	12/29/2003	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.034 JP	ND(0.041)	ND(0.041)	0.034 J
ESSS-R18	1 - 3	1/27/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.060	0.056	ND(0.034)	0.12
ESSS-R22	1 - 3	1/27/2004	ND(0.47)	ND(0.47)	ND(0.47)	ND(0.47)	4.1	2.8	ND(0.47)	6.9

Notes:
1. Samples were collected by Blasland, Bouck & Lee, Inc., and submitted to Severn Trent Laboratories, Inc. for analysis of PCBs.
2. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
3. In the areas where temporary cover materials have been placed (e.g., geotextile and soil cover), the 0- to 1-foot surface soil sampling interval will begin at the depth of the geotextile installed by EPA, which is considered to represent the boundary between clean barrier soils and native Site soils.
4. [ ] Indicates exceedance of Elm Street Area Total PCB Sub-surface Soil Criterion of 100 ppm.

Data Qualifiers:

J - Indicates an estimated value less than the practical quantitation limit (PQL).
P - Greater than 25% difference between primary and confirmation column.
B - Analyte was also detected in the associated method blank.

Table 3

Mill Street Area PCB Surface Soil Data

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

TABLE 3
MILL STREET AREA PCB SURFACE SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
MSMW-24C	0 - 1	1/5/2004	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	0.76	ND(0.18)	ND(0.18)	0.76 B
MSSB-B07	0 - 1	2/18/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.056	0.016 J	ND(0.036)	0.073
MSSB-B09	0 - 1	2/19/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.11	ND(0.037)	0.16	0.26
MSSB-B11	0 - 1	2/18/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.044	0.022 J	ND(0.036)	0.067
MSSB-B13	0 - 1	2/12/2004	ND(0.23)	ND(0.23)	ND(0.23)	ND(0.23)	1.2	0.45	ND(0.23)	1.6
MSSB-B15	0 - 1	2/12/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.31	0.16	ND(0.035)	0.47
MSSB-B17	0 - 1	2/12/2004	ND(0.24)	ND(0.24)	ND(0.24)	2.4	ND(0.24)	ND(0.24)	ND(0.24)	2.4
MSSB-C01	0 - 1	1/13/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.15	ND(0.036)	ND(0.036)	0.15
MSSB-C03	0 - 1	1/20/2004	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	0.73	ND(0.21)	ND(0.21)	0.73
MSSB-C05	0 - 1	1/6/2004	ND(3.7)	ND(3.7)	ND(3.7)	ND(3.7)	7.0	ND(3.7)	ND(3.7)	7.0
MSSB-C07	0 - 1	1/6/2004	ND(280)	ND(280)	ND(280)	ND(280)	1500 B	ND(280)	ND(280)	1500 B
MSSB-C09	0 - 1	1/13/2004	ND(0.26)	ND(0.26)	ND(0.26)	ND(0.26)	0.73	ND(0.26)	ND(0.26)	0.73
MSSB-C11	0 - 1	1/8/2004	ND(1.9)	ND(1.9)	ND(1.9)	ND(1.9)	6.6	ND(1.9)	ND(1.9)	6.6 B
MSSB-C13	0 - 1	1/8/2004	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	1.4	ND(0.18)	ND(0.18)	1.4 B
MSSB-C15	0 - 1	1/6/2004	ND(0.34)	ND(0.34)	ND(0.34)	2.5	ND(0.34)	ND(0.34)	ND(0.34)	2.5
MSSB-C17	0 - 1	1/7/2004	ND(0.34)	ND(0.34)	ND(0.34)	ND(0.34)	0.73	ND(0.34)	ND(0.34)	0.73
MSSB-C19	0 - 1	1/7/2004	ND(0.073)	ND(0.073)	ND(0.073)	0.27 B	ND(0.073)	ND(0.073)	ND(0.073)	0.27 B
MSSB-D17	0 - 1	12/17/2003	ND(0.69)	ND(0.69)	ND(0.69)	ND(0.69)	3.0	ND(0.69)	ND(0.69)	3.0
MSSB-E01	0 - 1	12/19/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.076 B	ND(0.039)	ND(0.039)	0.076 B
MSSB-E03	0 - 1	12/23/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.17	ND(0.038)	ND(0.038)	0.17
MSSB-E05	0 - 1	12/4/2003	ND(3.5)	ND(3.5)	ND(3.5)	ND(3.5)	14	9.2	ND(3.5)	23
MSSB-E07	0 - 1	12/9/2003	ND(750)	ND(750)	ND(750)	ND(750)	13000	ND(750)	ND(750)	13000
MSSB-E09	0 - 1	12/9/2003	ND(1.9)	ND(1.9)	ND(1.9)	ND(1.9)	7.7	ND(1.9)	ND(1.9)	7.7
MSSB-E11	0 - 1	12/18/2003	ND(1.8)	ND(1.8)	ND(1.8)	ND(1.8)	28 B	ND(1.8)	ND(1.8)	28 B
MSSB-E13	0 - 1	12/17/2003	ND(72)	ND(72)	ND(72)	ND(72)	920	ND(72)	ND(72)	920
MSSB-E15	0 - 1	12/17/2003	ND(680)	ND(680)	ND(680)	ND(680)	5200	ND(680)	ND(680)	5200
MSSB-F07	0 - 1	12/12/2003	ND(0.75)	ND(0.75)	ND(0.75)	ND(0.75)	6.4	ND(0.75)	ND(0.75)	6.4
MSSB-G01	0 - 1	12/11/2003	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.045	ND(0.034)	ND(0.034)	0.045
MSSB-G03	0 - 1	12/16/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.046	ND(0.035)	ND(0.035)	0.046
MSSB-G05	0 - 1	12/16/2003	ND(0.71)	ND(0.71)	ND(0.71)	ND(0.71)	2.7 B	ND(0.71)	ND(0.71)	ND(0.71)
MSSS-C02	0 - 1	1/12/2004	ND(0.24)	ND(0.24)	ND(0.24)	ND(0.24)	0.58	0.34 P	ND(0.24)	0.92
MSSS-C04	0 - 1	1/14/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.024 J	ND(0.040)	0.024 J
MSSS-C06	0 - 1	1/14/2004	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	0.035 J [0.056]	0.014 J [0.032 J]	ND(0.036) [ND(0.036)]	0.049 [0.089]
MSSS-C08	0 - 1	1/12/2004	ND(12)	ND(12)	ND(12)	ND(12)	54	ND(12)	ND(12)	54
MSSS-C10	0 - 1	1/12/2004	ND(25)	ND(25)	ND(25)	ND(25)	140	ND(25)	ND(25)	140
MSSS-C12	0 - 1	1/12/2004	ND(1100)	ND(1100)	ND(1100)	ND(1100)	3000	ND(1100)	ND(1100)	3000
MSSS-C14	0 - 1	1/12/2004	ND(0.24)	ND(0.24)	ND(0.24)	ND(0.24)	0.82	0.46	ND(0.24)	1.3
MSSS-C16	0 - 1	1/12/2004	ND(0.24)	ND(0.24)	ND(0.24)	ND(0.24)	0.77	0.63	ND(0.24)	1.4
MSSS-C18	0 - 1	1/12/2004	ND(0.30) [ND(0.21)]	ND(0.30) [ND(0.21)]	ND(0.30) [ND(0.21)]	ND(0.30) [ND(0.21)]	0.83 [1.0]	0.60 [0.79]	ND(0.30) [ND(0.21)]	1.4 [1.8]
MSSS-C20	0 - 1	1/12/2004	ND(0.23)	ND(0.23)	ND(0.23)	ND(0.23)	0.75	0.46 P	ND(0.23)	1.2
MSSS-D03	0 - 1	12/18/2003	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	0.027 BJ	ND(0.045)	ND(0.045)	0.027 BJ
MSSS-D04	0 - 1	12/18/2003	ND(0.77)	ND(0.77)	ND(0.77)	ND(0.77)	1.9 B	ND(0.77)	ND(0.77)	1.9 B
MSSS-D05	0 - 1	12/4/2003	ND(0.72)	ND(0.72)	ND(0.72)	ND(0.72)	3.0	3.6	ND(0.72)	6.5
MSSS-D06	0 - 1	12/4/2003	ND(3.7)	ND(3.7)	ND(3.7)	ND(3.7)	22	15 P	ND(3.7)	38
MSSS-D07	0 - 1	12/4/2003	ND(3.7)	ND(3.7)	ND(3.7)	ND(3.7)	49	31 P	ND(3.7)	80
MSSS-D08	0 - 1	12/4/2003	ND(2.0)	ND(2.0)	ND(2.0)	ND(2.0)	3.7	1.7 J	ND(2.0)	5.4
MSSS-D09	0 - 1	12/4/2003	ND(0.36)	ND(0.36)	ND(0.36)	ND(0.36)	1.9	1.2 P	ND(0.36)	3.1
MSSS-D10	0 - 1	12/4/2003	ND(3.7)	ND(3.7)	ND(3.7)	ND(3.7)	12	8.0	ND(3.7)	20
MSSS-D11	0 - 1	12/4/2003	ND(0.36)	ND(0.36)	ND(0.36)	ND(0.36)	1.2	0.70 P	ND(0.36)	1.9
MSSS-D13	0 - 1	12/4/2003	ND(0.71) [ND(0.71)]	ND(0.71) [ND(0.71)]	ND(0.71) [ND(0.71)]	ND(0.71) [ND(0.71)]	1.1 [1.2]	0.73 P [0.84 P]	ND(0.71) [ND(0.71)]	1.8 [2.1]

TABLE 3
MILL STREET AREA PCB SURFACE SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
MSSS-D14	0 - 1	12/4/2003	ND(0.14)	ND(0.14)	ND(0.14)	ND(0.14)	0.48	0.24	ND(0.14)	0.72
MSSS-D15	0 - 1	12/4/2003	ND(360)	ND(360)	ND(360)	ND(360)	2800	1600 P	ND(360)	4400
MSSS-E02	0 - 1	12/23/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.061 B	ND(0.039)	ND(0.039)	0.061 B
MSSS-E12	0 - 1	12/18/2003	ND(91)	ND(91)	ND(91)	ND(91)	1400 B	ND(91)	ND(91)	1400
MSSS-E14	0 - 1	12/18/2003	ND(180)	ND(180)	ND(180)	ND(180)	1500 B	ND(180)	ND(180)	1500
MSSS-F01	0 - 1	12/8/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.010 J	ND(0.036)	ND(0.036)	0.010 J
MSSS-F02	0 - 1	12/8/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.025 J	ND(0.035)	ND(0.035)	0.025 J
MSSS-F03	0 - 1	12/8/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.014 J	ND(0.037)	ND(0.037)	0.014 J
MSSS-F04	0 - 1	12/8/2003	ND(0.068)	ND(0.068)	ND(0.068)	ND(0.068)	0.38	ND(0.068)	ND(0.068)	0.38
MSSS-F06	0 - 1	12/8/2003	ND(0.72)	ND(0.72)	ND(0.72)	ND(0.72)	7.8	ND(0.72)	ND(0.72)	7.8
MSSS-F08	0 - 1	12/18/2003	ND(1.8)	ND(1.8)	ND(1.8)	ND(1.8)	18 B	ND(1.8)	ND(1.8)	18
MSSS-F09	0 - 1	12/18/2003	ND(1.7)	ND(1.7)	ND(1.7)	ND(1.7)	17 B	ND(1.7)	ND(1.7)	17
MSSS-F10	0 - 1	12/18/2003	ND(3.5)	ND(3.5)	ND(3.5)	ND(3.5)	61 B	ND(3.5)	ND(3.5)	61

Notes:
1. Samples were collected by Blasland, Bouck & Lee, Inc., and submitted to Severn Trent Laboratories, Inc. for analysis of PCBs.
2. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
3. In the areas where temporary cover materials have been placed (e.g., geotextile and soil cover), the 0- to 1-foot surface soil sampling interval will begin at the depth of the geotextile installed by EPA, which is considered to represent the boundary between clean barrier soils and native Site soils.
4. [ ] - Indicates exceedance of Total PCB Surface Soil Criterion of 1 ppm.

Data Qualifiers:

J - Indicates an estimated value less than the practical quantitation limit (PQL).
P - Greater than 25% difference between primary and confirmation column.
B - Analyte was also detected in the associated method blank.

Table 4

Mill Street Area PCB Subsurface Soil Data

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

TABLE 4
MILL STREET AREA PCB SUBSURFACE SOIL DATA

DRAFT
FOR EPA REVIEW

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
MSMW-22A	10 - 11	1/14/2004	ND(0.043)	ND(0.043)	ND(0.043)	0.013 J	ND(0.043)	ND(0.043)	ND(0.043)	0.013 J
	13 - 15	1/27/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.068	ND(0.036)	ND(0.036)	ND(0.036)	0.068 B
	15 - 17	1/27/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.11	ND(0.037)	ND(0.037)	ND(0.037)	0.11 B
	17 - 19	1/27/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.070	ND(0.036)	ND(0.036)	ND(0.036)	0.070 B
MSMW-22B	3 - 4	1/28/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.071 B	ND(0.035)	ND(0.035)	0.071 B
	4 - 6	1/28/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.48 B	ND(0.041)	ND(0.041)	0.48 B
	6 - 8	1/28/2004	ND(0.27)	ND(0.27)	ND(0.27)	ND(0.27)	1.8	ND(0.27)	ND(0.27)	1.8
	8 - 10	1/28/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.057 B	ND(0.035)	ND(0.035)	0.057 B
MSMW-23A	17 - 19	1/22/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.051	ND(0.037)	ND(0.037)	ND(0.037)	0.051
	19 - 21	1/22/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.046	ND(0.038)	ND(0.038)	ND(0.038)	0.046
	21 - 23	1/22/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.071	ND(0.039)	ND(0.039)	ND(0.039)	0.071
MSMW-23B	9 - 11	1/26/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.062	ND(0.039)	ND(0.039)	ND(0.039)	0.062
	11 - 13	1/26/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)
	13 - 15	1/26/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.022 JP	ND(0.038)	ND(0.038)	0.022 J
MSMW-23C	1 - 3	1/20/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.017 J	ND(0.034)	ND(0.034)	0.017 J
	3 - 5	1/20/2004	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]
	5 - 7	1/20/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.013 J	ND(0.038)	ND(0.038)	ND(0.038)	0.013 J
	7 - 9	1/20/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)
	15 - 17	1/20/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.11	ND(0.038)	ND(0.038)	ND(0.038)	0.11
MSMW-24A	17 - 19	1/6/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.56 B	ND(0.037)	ND(0.037)	ND(0.037)	0.56 B
	19 - 21	1/6/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.056 B	ND(0.036)	ND(0.036)	ND(0.036)	0.056 B
	21 - 23	1/6/2004	ND(0.035)	ND(0.035)	ND(0.035)	0.088 B	ND(0.035)	ND(0.035)	ND(0.035)	0.088 B
MSMW-24B	1 - 3	1/7/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.12	ND(0.038)	ND(0.038)	0.12
	9 - 11	1/7/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)
	11 - 13	1/7/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)
	13 - 15	1/8/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.015 J	0.012 BJP	ND(0.035)	0.027 BJ
MSMW-24C	3 - 5	1/5/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.084	0.053 P	ND(0.038)	0.14 B
	5 - 7	1/5/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.057 B	ND(0.036)	ND(0.036)	ND(0.036)	0.057 B
	7 - 9	1/5/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.041 B	ND(0.036)	ND(0.036)	ND(0.036)	0.041 B
	15 - 17	1/5/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.055 B	ND(0.038)	ND(0.038)	ND(0.038)	0.055 B
MSSB-B01	9 - 11	2/18/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)
	11 - 13	2/18/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.14	ND(0.037)	0.025 J	ND(0.037)	0.16
	13 - 15	2/18/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.046	ND(0.036)	ND(0.036)	ND(0.036)	0.046
	21 - 23	2/18/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.045	ND(0.038)	ND(0.038)	ND(0.038)	0.045
	23 - 25	2/18/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.013 J	ND(0.037)	ND(0.037)	ND(0.037)	0.013 J
	25 - 27	2/18/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.012 J	ND(0.034)	ND(0.034)	ND(0.034)	0.012 J
MSSB-B07	1 - 3	2/18/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.076	0.025 J	ND(0.035)	0.10
	3 - 5	2/18/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.11	0.065	ND(0.034)	0.18
	5 - 7	2/18/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.046 P	ND(0.034)	ND(0.034)	ND(0.034)	0.046
	7 - 9	2/18/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)
	9 - 11	2/18/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)
	11 - 13	2/18/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)
	13 - 15	2/18/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)
	15 - 17	2/18/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
	17 - 19	2/18/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.041	ND(0.037)	ND(0.037)	ND(0.037)	0.041
	19 - 21	2/18/2004	ND(0.035)	ND(0.035)	ND(0.035)	0.014 J	ND(0.035)	ND(0.035)	ND(0.035)	0.014 J
	21 - 23	2/18/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.031 J	ND(0.036)	ND(0.036)	ND(0.036)	0.031 J
	23 - 25	2/18/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.076	ND(0.039)	ND(0.039)	ND(0.039)	0.076
	25 - 27	2/18/2004	ND(0.043)	ND(0.043)	ND(0.043)	0.016 J	ND(0.043)	ND(0.043)	ND(0.043)	0.016 J
	27 - 28	2/18/2004	ND(0.043)	ND(0.043)	ND(0.043)	0.045	ND(0.043)	ND(0.043)	ND(0.043)	0.045

TABLE 4
MILL STREET AREA PCB SUBSURFACE SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
MSSB-B09	1 - 3	2/19/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)
	3 - 5	2/19/2004	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)
	5 - 7	2/19/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.071 P	ND(0.036)	0.014 JP	ND(0.036)	0.084
	7 - 9	2/19/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)
	9 - 11	2/19/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)
	11 - 13	2/19/2004	ND(0.036) [ND(0.035)]	ND(0.036) [ND(0.035)]	ND(0.036) [ND(0.035)]	ND(0.036) [ND(0.035)]	ND(0.036) [ND(0.035)]	ND(0.036) [ND(0.035)]	ND(0.036) [ND(0.035)]	ND(0.036) [ND(0.035)]
	13 - 14	2/19/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)
MSSB-B11	1 - 3	2/18/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.32	0.14	ND(0.035)	0.46
	3 - 5	2/18/2004	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)
	5 - 7	2/18/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.013 J	ND(0.036)	ND(0.036)	ND(0.036)	0.013 J
	7 - 9	2/18/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)
	9 - 11	2/18/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.045 P	ND(0.038)	ND(0.038)	ND(0.038)	0.045
	11 - 13	2/18/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)
	13 - 15	2/18/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
	15 - 17	2/18/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.064	ND(0.036)	ND(0.036)	ND(0.036)	0.064
	17 - 19	2/18/2004	ND(0.038) [ND(0.038)]	ND(0.038) [ND(0.038)]	ND(0.038) [ND(0.038)]	0.30 [0.32]	ND(0.038) [ND(0.038)]	ND(0.038) [ND(0.038)]	ND(0.038) [ND(0.038)]	0.30 [0.32]
	19 - 21	2/18/2004	ND(0.040)	ND(0.040)	ND(0.040)	0.40	ND(0.040)	ND(0.040)	ND(0.040)	0.40
	21 - 23	2/18/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.14	ND(0.039)	ND(0.039)	ND(0.039)	0.14
	23 - 25	2/18/2004	ND(0.040)	ND(0.040)	ND(0.040)	0.093	ND(0.040)	ND(0.040)	ND(0.040)	0.093
	25 - 27	2/18/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.14	ND(0.038)	ND(0.038)	ND(0.038)	0.14
	27 - 28	2/18/2004	ND(0.035)	ND(0.035)	ND(0.035)	0.15	ND(0.035)	ND(0.035)	ND(0.035)	0.15
MSSB-B13	1 - 3	2/12/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.034 J	ND(0.036)	ND(0.036)	ND(0.036)	0.034 J
	3 - 5	2/12/2004	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	0.053 [0.055]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	0.053 [0.055]
	5 - 7	2/12/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)
	7 - 9	2/12/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.13	ND(0.039)	ND(0.039)	ND(0.039)	0.13
	9 - 11	2/12/2004	ND(0.26)	ND(0.26)	ND(0.26)	2.2	ND(0.26)	ND(0.26)	ND(0.26)	2.2
	11 - 13	2/12/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.13	ND(0.038)	ND(0.038)	ND(0.038)	0.13
	13 - 15	2/12/2004	0.90	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	0.90
	15 - 17	2/12/2004	0.36	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.36
	17 - 19	2/12/2004	ND(0.035)	ND(0.035)	ND(0.035)	0.054	ND(0.035)	ND(0.035)	ND(0.035)	0.054
	19 - 21	2/12/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.60	ND(0.038)	ND(0.038)	ND(0.038)	0.60
	21 - 21.6	2/12/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.13	ND(0.037)	ND(0.037)	ND(0.037)	0.13
MSSB-B15	1 - 3	2/12/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.089	ND(0.036)	ND(0.036)	ND(0.036)	0.089
	3 - 5	2/12/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.18	ND(0.034)	ND(0.034)	ND(0.034)	0.18
	5 - 7	2/12/2004	ND(0.035)	ND(0.035)	ND(0.035)	0.056	ND(0.035)	ND(0.035)	ND(0.035)	0.056
	7 - 9	2/12/2004	ND(0.040)	ND(0.040)	ND(0.040)	0.26	ND(0.040)	ND(0.040)	ND(0.040)	0.26
	9 - 11	2/12/2004	ND(0.035)	ND(0.035)	ND(0.035)	0.032 J	ND(0.035)	ND(0.035)	ND(0.035)	0.032 J
	11 - 13	2/12/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.086	ND(0.036)	ND(0.036)	ND(0.036)	0.086
	13 - 15	2/12/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.077	ND(0.036)	ND(0.036)	ND(0.036)	0.077
	15 - 17	2/12/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.058	ND(0.037)	ND(0.037)	ND(0.037)	0.058
	17 - 19	2/12/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.035 J	ND(0.036)	ND(0.036)	ND(0.036)	0.035 J
	19 - 21	2/12/2004	ND(0.042)	ND(0.042)	ND(0.042)	0.11	ND(0.042)	ND(0.042)	ND(0.042)	0.11
	21 - 21.3	2/12/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.32	ND(0.036)	ND(0.036)	ND(0.036)	0.32
MSSB-B17	1 - 3	2/12/2004	ND(0.36)	ND(0.36)	ND(0.36)	2.0	ND(0.36)	ND(0.36)	ND(0.36)	2.0
	3 - 5	2/12/2004	ND(0.24)	ND(0.24)	ND(0.24)	2.7	ND(0.24)	ND(0.24)	ND(0.24)	2.7
	5 - 7	2/12/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.088	ND(0.039)	ND(0.039)	ND(0.039)	0.088
	7 - 9	2/12/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.34	ND(0.038)	ND(0.038)	ND(0.038)	0.34
	9 - 11	2/12/2004	ND(0.049)	ND(0.049)	ND(0.049)	0.098	ND(0.049)	ND(0.049)	ND(0.049)	0.098
	11 - 13	2/12/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.27	ND(0.036)	ND(0.036)	ND(0.036)	0.27
	13 - 15	2/12/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.062	ND(0.038)	ND(0.038)	ND(0.038)	0.062
	15 - 17	2/12/2004	ND(0.052)	ND(0.052)	ND(0.052)	0.078	ND(0.052)	ND(0.052)	ND(0.052)	0.078
	17 - 19	2/12/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.038	ND(0.036)	ND(0.036)	ND(0.036)	0.038
	19 - 19.6	2/12/2004	ND(0.035)	ND(0.035)	ND(0.035)	0.044	ND(0.035)	ND(0.035)	ND(0.035)	0.044

TABLE 4
MILL STREET AREA PCB SUBSURFACE SOIL DATA

DRAFT
FOR EPA REVIEW

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
MSSB-C01	1 - 3	1/13/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.089	ND(0.036)	ND(0.036)	0.089
	3 - 5	1/13/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.078	ND(0.034)	ND(0.034)	ND(0.034)	0.078
	5 - 7	1/13/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.031 J	ND(0.034)	ND(0.034)	ND(0.034)	0.031 J
	7 - 9	1/13/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.033 J	ND(0.034)	0.018 J	ND(0.034)	0.050
	9 - 11	1/13/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.068	ND(0.040)	ND(0.040)	0.068
	11 - 13	1/13/2004	ND(0.57)	ND(0.57)	ND(0.57)	ND(0.57)	2.5	1.9	ND(0.57)	4.4
	13 - 15	1/13/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.038	ND(0.037)	ND(0.037)	ND(0.037)	0.038
	15 - 17	1/13/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.087	ND(0.037)	0.047	ND(0.037)	0.13
	17 - 19	1/13/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.030 J	ND(0.036)	ND(0.036)	ND(0.036)	0.030 J
	19 - 21	1/13/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.031 J	ND(0.035)	ND(0.035)	0.031 J
	21 - 23	1/13/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.019 J	ND(0.037)	ND(0.037)	0.019 J
	23 - 25	1/13/2004	ND(2.2)	ND(2.2)	ND(2.2)	6.2	ND(2.2)	3.4	ND(2.2)	9.5
	25 - 27	1/13/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.12	ND(0.037)	0.062	ND(0.037)	0.18
	27 - 29	1/13/2004	ND(0.22)	ND(0.22)	ND(0.22)	0.29	ND(0.22)	0.20 J	ND(0.22)	0.49
	29 - 31	1/13/2004	ND(0.039) [ND(0.039)]	ND(0.039) [ND(0.039)]	ND(0.039) [ND(0.039)]	0.018 J [0.045]	ND(0.039) [ND(0.039)]	ND(0.039) [0.022 J]	ND(0.039) [ND(0.039)]	0.018 J [0.067]
	31 - 33	1/13/2004	ND(0.040)	ND(0.040)	ND(0.040)	0.029 J	ND(0.040)	ND(0.040)	ND(0.040)	0.029 J
	33 - 35	1/13/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.042	ND(0.039)	0.024 J	ND(0.039)	0.067
	35 - 36.5	1/13/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.036	ND(0.036)	0.020 J	ND(0.036)	0.056
MSSB-C03	1 - 3	1/20/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.055	0.044	ND(0.036)	0.099
	3 - 5	1/20/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.021 J	ND(0.034)	ND(0.034)	ND(0.034)	0.021 J
	5 - 7	1/20/2004	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]
	7 - 9	1/20/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.049	ND(0.034)	0.020 J	ND(0.034)	0.068
	9 - 11	1/20/2004	ND(0.041)	ND(0.041)	ND(0.041)	0.012 J	ND(0.041)	ND(0.041)	ND(0.041)	0.012 J
	11 - 13	1/20/2004	ND(0.040)	ND(0.040)	ND(0.040)	0.023 J	ND(0.040)	ND(0.040)	ND(0.040)	0.023 J
	13 - 15	1/20/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.016 J	ND(0.038)	ND(0.038)	ND(0.038)	0.016 J
	15 - 17	1/20/2004	ND(0.041)	ND(0.041)	ND(0.041)	0.016 J	ND(0.041)	ND(0.041)	ND(0.041)	0.016 J
	17 - 19	1/20/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.016 J	ND(0.038)	ND(0.038)	ND(0.038)	0.016 J
	19 - 21	1/20/2004	ND(0.041)	ND(0.041)	ND(0.041)	0.026 J	ND(0.041)	ND(0.041)	ND(0.041)	0.026 J
	21 - 23	1/20/2004	ND(0.042)	ND(0.042)	ND(0.042)	0.018 J	ND(0.042)	ND(0.042)	ND(0.042)	0.018 J
	23 - 25	1/20/2004	ND(0.042)	ND(0.042)	ND(0.042)	0.028 JP	ND(0.042)	ND(0.042)	ND(0.042)	0.028 J
	25 - 27	1/20/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.015 J	ND(0.039)	ND(0.039)	ND(0.039)	0.015 J
	27 - 27.4	1/20/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.014 J	ND(0.039)	ND(0.039)	ND(0.039)	0.014 J
MSSB-C05	1 - 3	1/6/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.022 J	ND(0.036)	ND(0.036)	0.022 J
	3 - 5	1/6/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.012 J	ND(0.039)	ND(0.039)	0.012 J
	5 - 7	1/6/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.016 J	0.011 J	ND(0.036)	0.027 J
	7 - 9	1/6/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.015 J	ND(0.037)	ND(0.037)	0.015 J
	9 - 11	1/6/2004	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.15	0.12	ND(0.043)	0.28
	11 - 13	1/6/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.021 J	ND(0.040)	ND(0.040)	0.021 J
	13 - 15	1/6/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.018 J	ND(0.036)	ND(0.036)	0.018 J
	15 - 17	1/6/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.031 J	ND(0.038)	ND(0.038)	0.031 J
	17 - 19	1/6/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.022 J	0.020 J	ND(0.036)	0.042
	19 - 21	1/6/2004	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.034 J	0.028 J	ND(0.039)	0.062
	21 - 23	1/6/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.027 J	ND(0.036)	ND(0.036)	ND(0.036)	0.027 J
	23 - 23.4	1/6/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.021 JP	ND(0.036)	ND(0.036)	ND(0.036)	0.021 J

TABLE 4
MILL STREET AREA PCB SUBSURFACE SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
MSSB-C06	1 - 3	2/16/2004	ND(300)	ND(300)	ND(300)	ND(300)	1500	ND(300)	ND(300)	1500
	3 - 5	2/16/2004	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.76	ND(0.035)	ND(0.035)	0.76
	5 - 7	2/16/2004	ND(0.035) [ND(0.036)]	ND(0.035) [ND(0.036)]	ND(0.035) [ND(0.036)]	ND(0.035) [ND(0.036)]	0.10 [0.14]	ND(0.035) [ND(0.036)]	ND(0.035) [ND(0.036)]	0.10 [0.14]
	7 - 9	2/16/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.12	ND(0.040)	ND(0.040)	0.12
	9 - 11	2/16/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)
	11 - 13	2/16/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.42	ND(0.037)	ND(0.037)	ND(0.037)	0.42
	13 - 15	2/16/2004	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.024 J	ND(0.037)	ND(0.037)	0.024 J
	15 - 17	2/16/2004	ND(0.035)	ND(0.035)	ND(0.035)	0.095	ND(0.035)	ND(0.035)	ND(0.035)	0.095
	17 - 19	2/16/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.073	ND(0.038)	ND(0.038)	ND(0.038)	0.073
	19 - 21	2/16/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.19	ND(0.037)	ND(0.037)	ND(0.037)	0.19
	21 - 22.5	2/16/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.16	ND(0.036)	ND(0.036)	ND(0.036)	0.16
MSSB-C07	1 - 3	1/6/2004	ND(1200)	ND(1200)	ND(1200)	ND(1200)	12000 B	ND(1200)	ND(1200)	12000 B
	3 - 5	1/6/2004	ND(7.0)	ND(7.0)	ND(7.0)	ND(7.0)	13	ND(7.0)	ND(7.0)	13
	5 - 7	1/6/2004	ND(35)	ND(35)	ND(35)	ND(35)	320	ND(35)	ND(35)	320
	7 - 9	1/6/2004	ND(200)	ND(200)	ND(200)	ND(200)	420 B	ND(200)	ND(200)	420 B
	9 - 11	1/6/2004	ND(930)	ND(930)	ND(930)	3600	ND(930)	ND(930)	ND(930)	3600 B
	11 - 13	1/6/2004	ND(1100)	ND(1100)	ND(1100)	8800	ND(1100)	ND(1100)	ND(1100)	8800 B
	13 - 15	1/6/2004	ND(5100)	ND(5100)	ND(5100)	25000	ND(5100)	ND(5100)	ND(5100)	25000 B
	15 - 17	1/6/2004	ND(1000)	ND(1000)	ND(1000)	9400	ND(1000)	ND(1000)	ND(1000)	9400 B
	17 - 19	1/6/2004	ND(7.5)	ND(7.5)	ND(7.5)	13	ND(7.5)	ND(7.5)	ND(7.5)	13
	19 - 21	1/6/2004	ND(38)	ND(38)	ND(38)	290	ND(38)	ND(38)	ND(38)	290
	21 - 21.4	1/6/2004	ND(6.7)	ND(6.7)	ND(6.7)	13	ND(6.7)	ND(6.7)	ND(6.7)	13
MSSB-C08	1 - 3	2/16/2004	ND(0.28)	ND(0.28)	ND(0.28)	ND(0.28)	2.0	ND(0.28)	ND(0.28)	2.0
	3 - 5	2/16/2004	ND(5.1)	ND(5.1)	ND(5.1)	ND(5.1)	45	ND(5.1)	ND(5.1)	45
	5 - 7	2/16/2004	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	2.4	ND(0.21)	ND(0.21)	2.4
	7 - 9	2/16/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.064	ND(0.038)	ND(0.038)	ND(0.038)	0.064
	9 - 11	2/16/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.12	ND(0.038)	ND(0.038)	ND(0.038)	0.12
	11 - 13	2/16/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.034 J	ND(0.039)	ND(0.039)	ND(0.039)	0.034 J
	13 - 15	2/16/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.12	ND(0.039)	ND(0.039)	ND(0.039)	0.12
	15 - 17	2/16/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.22	ND(0.037)	ND(0.037)	ND(0.037)	0.22
	17 - 19	2/16/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.074	ND(0.037)	ND(0.037)	ND(0.037)	0.074
	19 - 20	2/16/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.086	ND(0.038)	ND(0.038)	ND(0.038)	0.086
MSSB-C09	1 - 3	1/13/2004	ND(5.1) [ND(5.1)]	ND(5.1) [ND(5.1)]	ND(5.1) [ND(5.1)]	ND(5.1) [ND(5.1)]	29 [30]	ND(5.1) [ND(5.1)]	ND(5.1) [ND(5.1)]	29 [30]
	11 - 13	1/13/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.087	ND(0.041)	ND(0.041)	0.087
	19 - 21	1/13/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.041 P	ND(0.037)	ND(0.037)	ND(0.037)	0.041
MSSB-C11	1 - 3	1/8/2004	ND(37)	ND(37)	ND(37)	ND(37)	110	ND(37)	ND(37)	110 B
	3 - 5	1/8/2004	ND(200) [ND(170)]	ND(200) [ND(170)]	ND(200) [ND(170)]	ND(200) [ND(170)]	1100 [790]	ND(200) [ND(170)]	ND(200) [ND(170)]	1100 B [790 B]
	5 - 7	1/8/2004	ND(0.37)	ND(0.37)	ND(0.37)	ND(0.37)	2.1	ND(0.37)	ND(0.37)	2.1 B
	7 - 9	1/8/2004	ND(0.15)	ND(0.15)	ND(0.15)	ND(0.15)	0.42	ND(0.15)	ND(0.15)	0.42 B
	9 - 11	1/8/2004	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.10	ND(0.038)	ND(0.038)	0.10 B
	11 - 13	1/8/2004	ND(0.76)	ND(0.76)	ND(0.76)	ND(0.76)	3.7	ND(0.76)	ND(0.76)	3.7 B
	13 - 15	1/8/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.45	ND(0.041)	ND(0.041)	0.45 B
	15 - 17	1/8/2004	ND(0.081)	ND(0.081)	ND(0.081)	ND(0.081)	0.42	ND(0.081)	ND(0.081)	0.42 B
	17 - 19	1/8/2004	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.31	ND(0.040)	ND(0.040)	0.31 B
	19 - 21	1/8/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.18 B	ND(0.036)	0.087 B	ND(0.036)	0.26 B

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MSSB-C12	1 - 3	2/12/2004	ND(290)	ND(290)	ND(290)	ND(290)	6700	ND(290)	ND(290)	6700 B
	3 - 5	2/12/2004	ND(530)	ND(530)	ND(530)	ND(530)	12000	ND(530)	ND(530)	12000 B
	5 - 7	2/12/2004	ND(130)	ND(130)	ND(130)	4700	ND(130)	ND(130)	ND(130)	4700
	7 - 9	2/12/2004	ND(210)	ND(210)	ND(210)	2900	ND(210)	ND(210)	ND(210)	2900
	9 - 11	2/12/2004	ND(110) [ND(100)]	ND(110) [ND(100)]	ND(110) [ND(100)]	2600 [1900]	ND(110) [ND(100)]	ND(110) [ND(100)]	ND(110) [ND(100)]	2600 [1900]
	11 - 13	2/12/2004	ND(260)	ND(260)	ND(260)	5700	ND(260)	ND(260)	ND(260)	5700
	13 - 15	2/12/2004	ND(3.2)	ND(3.2)	ND(3.2)	33	ND(3.2)	ND(3.2)	ND(3.2)	33
	15 - 17	2/12/2004	ND(12)	ND(12)	ND(12)	110	ND(12)	ND(12)	ND(12)	110
	17 - 19	2/12/2004	ND(44)	ND(44)	ND(44)	1400	ND(44)	ND(44)	ND(44)	1400
	19 - 19.8	2/12/2004	ND(120)	ND(120)	ND(120)	1300	ND(120)	ND(120)	ND(120)	1300
MSSB-C13	1 - 3	1/8/2004	ND(37)	ND(37)	ND(37)	ND(37)	100	ND(37)	ND(37)	100 B
	3 - 5	1/8/2004	ND(35)	ND(35)	ND(35)	ND(35)	58 B	ND(35)	ND(35)	58 B
	5 - 7	1/8/2004	ND(720)	ND(720)	ND(720)	ND(720)	2300 B	ND(720)	ND(720)	2300 B
	7 - 9	1/8/2004	ND(39)	ND(39)	ND(39)	ND(39)	47 B	ND(39)	ND(39)	47 B
	9 - 11	1/8/2004	ND(0.37) [ND(0.072)]	ND(0.37) [ND(0.072)]	ND(0.37) [ND(0.072)]	ND(0.37) [ND(0.072)]	0.73 [0.51]	0.56 B [0.40 B]	ND(0.37) [ND(0.072)]	1.3 B [0.92 B]
	11 - 13	1/8/2004	ND(1.9)	ND(1.9)	ND(1.9)	ND(1.9)	9.9	7.5 B	ND(1.9)	17 B
	13 - 15	1/8/2004	ND(0.39)	ND(0.39)	ND(0.39)	ND(0.39)	1.4	0.88 B	ND(0.39)	2.3 B
	15 - 17	1/8/2004	ND(39)	ND(39)	ND(39)	ND(39)	94	63 B	ND(39)	160 B
	17 - 18.7	1/8/2004	ND(1.8)	ND(1.8)	ND(1.8)	ND(1.8)	6.9	4.8 B	ND(1.8)	12 B
MSSB-C14	1 - 3	2/12/2004	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	0.86	ND(0.21)	ND(0.21)	0.86
	3 - 5	2/12/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.028 J	ND(0.036)	ND(0.036)	0.028 J
	5 - 7	2/12/2004	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)
	7 - 9	2/12/2004	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)
	9 - 11	2/12/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.051 P	ND(0.039)	ND(0.039)	ND(0.039)	0.051
	11 - 13	2/12/2004	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
	13 - 15	2/12/2004	ND(0.20)	ND(0.20)	ND(0.20)	1.6 B	ND(0.20)	ND(0.20)	ND(0.20)	1.6 B
	15 - 17	2/12/2004	ND(0.037)	0.39 P	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.39
	17 - 19	2/12/2004	ND(0.038)	0.29 P	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.29
	19 - 20	2/12/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.24	ND(0.036)	ND(0.036)	ND(0.036)	0.24
MSSB-C15	1 - 3	1/6/2004	ND(0.17)	ND(0.17)	ND(0.17)	0.86	ND(0.17)	ND(0.17)	ND(0.17)	0.86
	3 - 5	1/6/2004	ND(0.14)	ND(0.14)	ND(0.14)	0.43	ND(0.14)	ND(0.14)	ND(0.14)	0.43
	5 - 7	1/6/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.24	ND(0.034)	ND(0.034)	ND(0.034)	0.24
	7 - 9	1/6/2004	ND(0.36)	ND(0.36)	ND(0.36)	2.6	ND(0.36)	ND(0.36)	ND(0.36)	2.6
	9 - 11	1/6/2004	ND(0.14)	ND(0.14)	ND(0.14)	0.52	ND(0.14)	ND(0.14)	ND(0.14)	0.52
	11 - 13	1/6/2004	ND(0.15)	ND(0.15)	ND(0.15)	1.3	ND(0.15)	ND(0.15)	ND(0.15)	1.3
	13 - 15	1/6/2004	ND(0.19)	ND(0.19)	ND(0.19)	0.57	ND(0.19)	ND(0.19)	ND(0.19)	0.57
	15 - 17	1/6/2004	ND(0.19)	ND(0.19)	ND(0.19)	1.1	ND(0.19)	ND(0.19)	ND(0.19)	1.1
	17 - 19	1/6/2004	ND(0.14)	ND(0.14)	ND(0.14)	0.40	ND(0.14)	ND(0.14)	ND(0.14)	0.40
	19 - 20.4	1/6/2004	ND(0.14)	ND(0.14)	ND(0.14)	0.68	ND(0.14)	ND(0.14)	ND(0.14)	0.68
MSSB-C17	1 - 3	1/7/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.018 J	ND(0.034)	ND(0.034)	ND(0.034)	0.018 J
	3 - 5	1/7/2004	ND(0.70)	ND(0.70)	ND(0.70)	1.7	ND(0.70)	ND(0.70)	ND(0.70)	1.7
	5 - 7	1/7/2004	ND(0.039) [ND(0.039)]	ND(0.039) [ND(0.039)]	ND(0.039) [ND(0.039)]	0.051 [0.11 B]	ND(0.039) [ND(0.039)]	0.032 J [ND(0.039)]	ND(0.039) [ND(0.039)]	0.084 [0.11 B]
	7 - 9	1/7/2004	ND(0.71)	ND(0.71)	ND(0.71)	1.6	ND(0.71)	ND(0.71)	ND(0.71)	1.6
	9 - 11	1/7/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.047	ND(0.037)	ND(0.037)	ND(0.037)	0.047
	11 - 13	1/7/2004	ND(0.18)	ND(0.18)	ND(0.18)	0.25	ND(0.18)	ND(0.18)	ND(0.18)	0.25
	13 - 15	1/7/2004	ND(0.039)	ND(0.039)	ND(0.039)	0.044	ND(0.039)	ND(0.039)	ND(0.039)	0.044
	15 - 17	1/7/2004	ND(0.77)	ND(0.77)	ND(0.77)	1.5	ND(0.77)	ND(0.77)	ND(0.77)	1.5
	17 - 19	1/7/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.060	ND(0.037)	ND(0.037)	ND(0.037)	0.060
	19 - 20.2	1/7/2004	ND(0.38)	ND(0.38)	ND(0.38)	0.26 J	ND(0.38)	ND(0.38)	ND(0.38)	0.26 J

TABLE 4
MILL STREET AREA PCB SUBSURFACE SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
MSSB-C19	1 - 3	1/7/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.041 B	ND(0.037)	ND(0.037)	ND(0.037)	0.041 B
	3 - 5	1/7/2004	ND(0.14)	ND(0.14)	ND(0.14)	0.27 B	ND(0.14)	ND(0.14)	ND(0.14)	0.27 B
	5 - 7	1/7/2004	ND(0.035)	ND(0.035)	ND(0.035)	0.042 B	ND(0.035)	ND(0.035)	ND(0.035)	0.042 B
	7 - 9	1/7/2004	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	0.25 B [0.29 B]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	ND(0.034) [ND(0.034)]	0.25 B [0.29 B]
	9 - 11	1/7/2004	ND(0.034)	ND(0.034)	ND(0.034)	0.093 B	ND(0.034)	ND(0.034)	ND(0.034)	0.093 B
	11 - 13	1/7/2004	ND(0.035)	ND(0.035)	ND(0.035)	0.15 B	ND(0.035)	ND(0.035)	ND(0.035)	0.15 B
	13 - 15	1/7/2004	ND(0.040)	ND(0.040)	ND(0.040)	0.14	ND(0.040)	ND(0.040)	ND(0.040)	0.14
	15 - 17	1/7/2004	ND(0.038)	ND(0.038)	ND(0.038)	0.10	ND(0.038)	ND(0.038)	ND(0.038)	0.10
	17 - 19	1/7/2004	ND(0.037)	ND(0.037)	ND(0.037)	0.018 J	ND(0.037)	ND(0.037)	ND(0.037)	0.018 J
	19 - 20.2	1/7/2004	ND(0.036)	ND(0.036)	ND(0.036)	0.032 J	ND(0.036)	ND(0.036)	ND(0.036)	0.032 J
MSSB-D07	1 - 3	2/13/2004	ND(0.24)	ND(0.24)	ND(0.24)	ND(0.24)	5.0	ND(0.24)	ND(0.24)	5.0 B
	3 - 5	2/13/2004	ND(0.23)	ND(0.23)	ND(0.23)	0.66	ND(0.23)	ND(0.23)	ND(0.23)	0.66
	5 - 7	2/13/2004	5.0 P	ND(0.44)	ND(0.44)	ND(0.44)	ND(0.44)	ND(0.44)	ND(0.44)	5.0
	7 - 9	2/13/2004	ND(0.57)	ND(0.57)	ND(0.57)	ND(0.57)	5.8	ND(0.57)	ND(0.57)	5.8
	9 - 11	2/13/2004	ND(0.21)	ND(0.21)	ND(0.21)	ND(0.21)	2.1	ND(0.21)	ND(0.21)	2.1
	11 - 13	2/13/2004	ND(0.28)	ND(0.28)	ND(0.28)	1.5 P	ND(0.28)	ND(0.28)	ND(0.28)	1.5
	13 - 15	2/13/2004	0.48	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	ND(0.045)	0.48
	15 - 17	2/13/2004	ND(0.26)	ND(0.26)	ND(0.26)	0.92	ND(0.26)	ND(0.26)	ND(0.26)	0.92
	17 - 19	2/13/2004	ND(0.24)	ND(0.24)	ND(0.24)	0.79	ND(0.24)	ND(0.24)	ND(0.24)	0.79
	19 - 21	2/13/2004	ND(0.26)	ND(0.26)	ND(0.26)	1.1	ND(0.26)	ND(0.26)	ND(0.26)	1.1
MSSB-D13	1 - 3	2/13/2004	ND(460)	ND(460)	ND(460)	10000 B	ND(460)	ND(460)	ND(460)	10000 B
	3 - 5	2/13/2004	ND(400) [ND(550)]	ND(400) [ND(550)]	ND(400) [ND(550)]	20000 B [20000]	ND(400) [ND(550)]	ND(400) [ND(550)]	ND(400) [ND(550)]	20000 B [20000]
	5 - 7	2/13/2004	ND(500)	ND(500)	ND(500)	7800 B	ND(500)	ND(500)	ND(500)	7800 B
	7 - 9	2/13/2004	ND(260)	ND(260)	ND(260)	1900 B	ND(260)	ND(260)	ND(260)	1900 B
	9 - 11	2/13/2004	ND(120)	ND(120)	ND(120)	3400 B	ND(120)	ND(120)	ND(120)	3400 B
	11 - 13	2/13/2004	ND(4.7)	ND(4.7)	ND(4.7)	56 B	ND(4.7)	ND(4.7)	ND(4.7)	56 B
	13 - 15	2/13/2004	ND(48)	ND(48)	ND(48)	620 B	ND(48)	460	ND(48)	1100 B
	15 - 17	2/13/2004	ND(4.0)	ND(4.0)	ND(4.0)	22 B	ND(4.0)	12	ND(4.0)	34 B
	17 - 19	2/13/2004	ND(0.44)	ND(0.44)	ND(0.44)	5.0 B	ND(0.44)	ND(0.44)	ND(0.44)	5.0 B
	19 - 21	2/13/2004	ND(100)	ND(100)	ND(100)	650 B	ND(100)	ND(100)	ND(100)	650 B
	21 - 22	2/13/2004	ND(220)	ND(220)	ND(220)	4300 B	ND(220)	ND(220)	ND(220)	4300 B
MSSB-D17	1 - 3	12/17/2003	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	0.032 J [0.033 J]	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	0.032 J [0.033 J]
	3 - 5	12/17/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.042	ND(0.035)	ND(0.035)	0.042
	5 - 7	12/17/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.029 J	ND(0.040)	ND(0.040)	0.029 J
	7 - 9	12/17/2003	ND(0.072)	ND(0.072)	ND(0.072)	0.17	ND(0.072)	ND(0.072)	ND(0.072)	0.17
	9 - 11	12/17/2003	ND(0.037)	ND(0.037)	ND(0.037)	0.056 P	ND(0.037)	ND(0.037)	ND(0.037)	0.056
	11 - 13	12/17/2003	ND(0.038)	ND(0.038)	ND(0.038)	0.023 J	ND(0.038)	ND(0.038)	ND(0.038)	0.023 J
	13 - 14.5	12/17/2003	ND(0.036)	ND(0.036)	ND(0.036)	0.17	ND(0.036)	ND(0.036)	ND(0.036)	0.17
MSSB-E01	1 - 3	12/19/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.018 BJ	ND(0.039)	ND(0.039)	0.018 BJ
	3 - 5	12/19/2003	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.024 BJ	ND(0.042)	ND(0.042)	0.024 BJ
	5 - 7	12/19/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.031 BJ	ND(0.037)	ND(0.037)	0.031 BJ
	7 - 9	12/19/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.061 B	ND(0.038)	ND(0.038)	0.061 B
	9 - 11	12/19/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.055 B	ND(0.037)	ND(0.037)	0.055 B
	11 - 13	12/19/2003	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.048 B	ND(0.042)	ND(0.042)	0.048 B
	13 - 15	12/19/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.043 B	ND(0.039)	ND(0.039)	0.043 B
	15 - 17	12/19/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.054 B	ND(0.039)	ND(0.039)	0.054 B
	17 - 19	12/19/2003	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.054 B	ND(0.041)	ND(0.041)	0.054 B
	19 - 21	12/19/2003	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.026 BJ	ND(0.043)	ND(0.043)	0.026 BJ
	21 - 23	12/19/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.026 BJ	ND(0.038)	ND(0.038)	0.026 BJ
	23 - 24.1	12/19/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.025 BJ	ND(0.038)	ND(0.038)	0.025 BJ

TABLE 4
MILL STREET AREA PCB SUBSURFACE SOIL DATA

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FOR EPA REVIEW

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
MSSB-E03	1 - 3	12/23/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.021 JP	ND(0.035)	ND(0.035)	0.021 J
	3 - 5	12/23/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.024 J	ND(0.035)	ND(0.035)	0.024 J
	5 - 7	12/23/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
	7 - 9	12/23/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.039 P	ND(0.039)	ND(0.039)	0.039
	9 - 11	12/23/2003	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	ND(0.036) [0.019 BJ]	ND(0.036) [ND(0.036)]	ND(0.036) [ND(0.036)]	ND(0.036) [0.019 BJ]
	11 - 13	12/23/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.022 J	ND(0.038)	ND(0.038)	0.022 J
	13 - 15	12/23/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.020 J	0.014 J	ND(0.039)	0.034 J
	15 - 17	12/23/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.021 J	0.018 J	ND(0.039)	0.039
	17 - 19	12/23/2003	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.022 BJ	ND(0.043)	ND(0.043)	0.022 BJ
	19 - 21	12/23/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.027 BJ	ND(0.035)	ND(0.035)	0.027 BJ
	21 - 21.4	12/23/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.053 B	ND(0.035)	ND(0.035)	0.053 B
MSSB-E05	1 - 3	12/4/2003	ND(3.6)	ND(3.6)	ND(3.6)	ND(3.6)	3.7	2.7 J	ND(3.6)	6.4
	3 - 5	12/4/2003	ND(0.70)	ND(0.70)	ND(0.70)	ND(0.70)	3.9	3.2	ND(0.70)	7.1
	5 - 7	12/4/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.097	0.088	ND(0.037)	0.18
	7 - 9	12/4/2003	ND(0.039)	ND(0.039)	ND(0.039)	0.040 P	ND(0.039)	ND(0.039)	ND(0.039)	0.040
	9 - 11	12/11/2003	ND(0.041) [ND(0.040)]	ND(0.041) [ND(0.040)]	ND(0.041) [ND(0.040)]	ND(0.041) [ND(0.040)]	0.020 J [0.029 J]	ND(0.041) [ND(0.040)]	ND(0.041) [ND(0.040)]	0.020 J [0.029 J]
	11 - 13	12/11/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.025 J	0.021 J	ND(0.036)	0.046
MSSB-E07	1 - 3	12/9/2003	ND(0.70)	ND(0.70)	ND(0.70)	ND(0.70)	8.4	ND(0.70)	ND(0.70)	8.4
	3 - 5	12/9/2003	ND(0.13)	ND(0.13)	ND(0.13)	ND(0.13)	1.7	ND(0.13)	ND(0.13)	1.7
	5 - 7	12/9/2003	ND(0.036)	ND(0.036)	ND(0.036)	0.21	ND(0.036)	ND(0.036)	ND(0.036)	0.21
	7 - 9	12/9/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.29	ND(0.036)	ND(0.036)	0.29
	9 - 11	12/9/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.067	0.029 J	ND(0.039)	0.096
	11 - 13	12/9/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)
	13 - 15	12/9/2003	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)
	15 - 17	12/9/2003	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.047	ND(0.043)	ND(0.043)	0.047
	17 - 19	12/9/2003	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.025 J	ND(0.042)	ND(0.042)	0.025 J
	19 - 20.4	12/9/2003	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.22	ND(0.042)	ND(0.042)	0.22
MSSB-E09	1 - 3	12/9/2003	ND(3.5)	ND(3.5)	ND(3.5)	ND(3.5)	33	ND(3.5)	ND(3.5)	33
	3 - 5	12/9/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.082	ND(0.037)	ND(0.037)	0.082
	5 - 7	12/9/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.020 J	ND(0.037)	ND(0.037)	0.020 J
	7 - 9	12/9/2003	ND(0.039)	ND(0.039)	ND(0.039)	ND(0.039)	0.11	ND(0.039)	ND(0.039)	0.11
	9 - 11	12/9/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.012 J	ND(0.040)	ND(0.040)	0.012 J
	11 - 13	12/9/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)
	13 - 15	12/9/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)
	15 - 17	12/9/2003	ND(0.039)	ND(0.039)	ND(0.039)	0.016 J	ND(0.039)	ND(0.039)	ND(0.039)	0.016 J
	17 - 19	12/9/2003	ND(0.038)	ND(0.038)	ND(0.038)	0.037 J	ND(0.038)	ND(0.038)	ND(0.038)	0.037 J
	19 - 21	12/11/2003	ND(0.038)	ND(0.038)	ND(0.038)	0.042	ND(0.038)	ND(0.038)	ND(0.038)	0.042
MSSB-E11	1 - 3	12/18/2003	ND(35) [ND(18)]	ND(35) [ND(18)]	ND(35) [ND(18)]	ND(35) [ND(18)]	280 B [290 B]	ND(35) [ND(18)]	ND(35) [ND(18)]	280 B [290]
	3 - 5	12/18/2003	ND(0.74)	ND(0.74)	ND(0.74)	ND(0.74)	3.6 B	ND(0.74)	ND(0.74)	3.6 B
	5 - 7	12/18/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.023 BJ	ND(0.036)	ND(0.036)	0.023 BJ
	7 - 9	12/18/2003	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.039 B	ND(0.034)	ND(0.034)	0.039 B
	9 - 11	12/18/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)
	11 - 13	12/18/2003	ND(0.20)	ND(0.20)	ND(0.20)	ND(0.20)	0.79 B	ND(0.20)	ND(0.20)	0.79 B
	13 - 15	12/18/2003	ND(0.16)	ND(0.16)	ND(0.16)	ND(0.16)	0.55 B	ND(0.16)	ND(0.16)	0.55 B
	15 - 17	12/18/2003	ND(0.082)	ND(0.082)	ND(0.082)	ND(0.082)	0.31 B	ND(0.082)	ND(0.082)	0.31 B
	17 - 19	12/18/2003	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.29 B	ND(0.042)	ND(0.042)	0.29 B
	19 - 21	12/18/2003	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.073 B	ND(0.042)	ND(0.042)	0.073 B
	21 - 21.8	12/18/2003	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.017 BJ	ND(0.041)	ND(0.041)	0.017 BJ

TABLE 4
MILL STREET AREA PCB SUBSURFACE SOIL DATA

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PRE-DESIGN SOIL INVESTIGATION SAMPLING
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GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
MSSB-E13	1 - 3	12/17/2003	ND(1800)	ND(1800)	ND(1800)	12000	ND(1800)	ND(1800)	ND(1800)	12000
	3 - 5	12/17/2003	ND(2.0)	ND(2.0)	ND(2.0)	15	ND(2.0)	ND(2.0)	ND(2.0)	15
	5 - 7	12/17/2003	ND(0.039)	ND(0.039)	ND(0.039)	0.22	ND(0.039)	ND(0.039)	ND(0.039)	0.22
	7 - 9	12/17/2003	ND(8.6)	ND(8.6)	ND(8.6)	36	ND(8.6)	ND(8.6)	ND(8.6)	36
	9 - 11	12/17/2003	ND(0.74)	ND(0.74)	ND(0.74)	5.6	ND(0.74)	ND(0.74)	ND(0.74)	5.6
	11 - 13	12/17/2003	ND(0.19)	ND(0.19)	ND(0.19)	2.0	ND(0.19)	ND(0.19)	ND(0.19)	2.0
	13 - 15	12/17/2003	ND(0.15)	ND(0.15)	ND(0.15)	0.44	ND(0.15)	ND(0.15)	ND(0.15)	0.44
	15 - 17	12/17/2003	ND(0.15)	ND(0.15)	ND(0.15)	0.82	ND(0.15)	ND(0.15)	ND(0.15)	0.82
	17 - 19	12/17/2003	ND(0.083)	ND(0.083)	ND(0.083)	0.27	ND(0.083)	ND(0.083)	ND(0.083)	0.27
	19 - 21	12/18/2003	ND(0.17)	ND(0.17)	ND(0.17)	0.92	ND(0.17)	ND(0.17)	ND(0.17)	0.92 B
	21 - 21.3	12/18/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.032 BJ	ND(0.036)	ND(0.036)	0.032 BJ
MSSB-E15	1 - 3	12/17/2003	ND(18)	ND(18)	ND(18)	ND(18)	64	ND(18)	ND(18)	64
	3 - 5	12/17/2003	ND(0.18)	ND(0.18)	ND(0.18)	ND(0.18)	0.71	ND(0.18)	ND(0.18)	0.71
	5 - 7	12/17/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.12	ND(0.035)	0.025 J	0.15
	7 - 9	12/17/2003	ND(0.076)	ND(0.076)	ND(0.076)	ND(0.076)	0.15	0.22	ND(0.076)	0.36
	9 - 11	12/17/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.016 J	0.016 JP	ND(0.038)	0.032 J
	11 - 13	12/17/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.014 J	ND(0.037)	ND(0.037)	0.014 J
	13 - 13.6	12/17/2003	ND(0.038)	ND(0.038)	ND(0.038)	0.15	ND(0.038)	ND(0.038)	ND(0.038)	0.15
MSSB-F07	1 - 3	12/12/2003	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.062	ND(0.034)	ND(0.034)	0.062
	3 - 5	12/12/2003	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	0.014 J	ND(0.033)	ND(0.033)	0.014 J
	5 - 7	12/12/2003	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)	ND(0.033)
	7 - 9	12/12/2003	ND(0.034)	ND(0.034)	ND(0.034)	ND(0.034)	0.066	ND(0.034)	ND(0.034)	0.066
	9 - 11	12/12/2003	ND(0.038)	ND(0.038)	ND(0.038)	0.081	ND(0.038)	ND(0.038)	ND(0.038)	0.081
	11 - 13	12/12/2003	ND(0.039)	ND(0.039)	ND(0.039)	0.011 J	ND(0.039)	ND(0.039)	ND(0.039)	0.011 J
	13 - 15	12/12/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)
	15 - 17	12/12/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)
MSSB-G01	1 - 3	12/11/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.013 J	ND(0.036)	ND(0.036)	0.013 J
	3 - 5	12/11/2003	ND(0.046) [ND(0.044)]	ND(0.046) [ND(0.044)]	ND(0.046) [ND(0.044)]	ND(0.046) [ND(0.044)]	0.066 [0.036 J]	ND(0.046) [ND(0.044)]	ND(0.046) [ND(0.044)]	0.066 [0.036 J]
	5 - 7	12/11/2003	ND(0.075)	ND(0.075)	ND(0.075)	ND(0.075)	0.33	ND(0.075)	ND(0.075)	0.33
	7 - 9	12/11/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.014 J	ND(0.037)	ND(0.037)	0.014 J
	9 - 11	12/11/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
	11 - 13	12/11/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)
	13 - 15	12/11/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)
	15 - 17	12/11/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.013 JP	ND(0.036)	ND(0.036)	0.013 J
	17 - 19	12/11/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)
	19 - 21	12/11/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.033 JP	ND(0.037)	ND(0.037)	0.033 J
	21 - 23	12/11/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)
	23 - 25	12/11/2003	ND(0.042)	ND(0.042)	ND(0.042)	ND(0.042)	0.016 J	ND(0.042)	ND(0.042)	0.016 J
	25 - 27	12/11/2003	ND(0.043)	ND(0.043)	ND(0.043)	ND(0.043)	0.097	ND(0.043)	ND(0.043)	0.097
	27 - 29	12/12/2003	ND(0.038) [ND(0.037)]	ND(0.038) [ND(0.037)]	ND(0.038) [ND(0.037)]	ND(0.038) [ND(0.037)]	0.028 J [ND(0.037)]	ND(0.038) [ND(0.037)]	ND(0.038) [ND(0.037)]	0.028 J [ND(0.037)]
	29 - 31	12/12/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.031 J	ND(0.040)	ND(0.040)	0.031 J
	31 - 31.5	12/12/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.012 J	ND(0.040)	ND(0.040)	0.012 J

TABLE 4
MILL STREET AREA PCB SUBSURFACE SOIL DATA

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FOR EPA REVIEW

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Sample ID	Depth (Feet)	Date Collected	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
MSSB-G03	1 - 3	12/16/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.025 J	ND(0.036)	ND(0.036)	0.025 J
	3 - 5	12/16/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.079	ND(0.036)	ND(0.036)	0.079
	5 - 7	12/16/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.048	ND(0.035)	ND(0.035)	0.048
	7 - 9	12/16/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.036 J	ND(0.037)	ND(0.037)	0.036 J
	9 - 11	12/16/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.026 J	ND(0.040)	ND(0.040)	0.026 J
	11 - 13	12/16/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.050	ND(0.037)	ND(0.037)	0.050
	13 - 15	12/16/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.029 J	ND(0.037)	ND(0.037)	0.029 J
	20 - 21	12/16/2003	ND(0.078)	ND(0.078)	ND(0.078)	ND(0.078)	0.26	ND(0.078)	ND(0.078)	0.26
	21 - 23	12/16/2003	ND(0.041)	ND(0.041)	ND(0.041)	ND(0.041)	0.11	ND(0.041)	ND(0.041)	0.11
	23 - 25	12/16/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.014 BJ	ND(0.036)	ND(0.036)	ND(0.036)
	25 - 26	12/16/2003	ND(0.037)	ND(0.037)	ND(0.037)	ND(0.037)	0.075 B	ND(0.037)	ND(0.037)	ND(0.037)
MSSB-G05	1 - 3	12/16/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.021 BJ	ND(0.035)	ND(0.035)	ND(0.035)
	3 - 5	12/16/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.014 BJ	ND(0.035)	ND(0.035)	ND(0.035)
	5 - 7	12/16/2003	ND(0.035)	ND(0.035)	ND(0.035)	ND(0.035)	0.031 BJ	ND(0.035)	ND(0.035)	ND(0.035)
	7 - 9	12/16/2003	ND(0.036)	ND(0.036)	ND(0.036)	ND(0.036)	0.011 BJ	ND(0.036)	ND(0.036)	ND(0.036)
	9 - 11	12/16/2003	ND(0.040)	ND(0.040)	ND(0.040)	ND(0.040)	0.048 B	ND(0.040)	ND(0.040)	ND(0.040)
	11 - 12	12/16/2003	ND(0.038)	ND(0.038)	ND(0.038)	ND(0.038)	0.022 BJ	0.013 J	ND(0.038)	ND(0.038)

Notes:
1. Samples were collected by Blasland, Bouck & Lee, Inc., and submitted to Severn Trent Laboratories, Inc. for analysis of PCBs.
2. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
3. In the areas where temporary cover materials have been placed (e.g., geotextile and soil cover), the 0- to 1-foot surface soil sampling interval will begin at the depth of the geotextile installed by EPA, which is considered to represent the boundary between clean barrier soils and native Site soils.
4. [ ] - Indicates exceedance of Mill Street Area Total PCB Sub-surface Soil Criterion of 1 ppm.

Data Qualifiers:

J - Indicates an estimated value less than the practical quantitation limit (PQL).
P - Greater than 25% difference between primary and confirmation column.
B - Analyte was also detected in the associated method blank.

Table 5

Elm Street Area Non-PCB Soil Data

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

TABLE 5
ELM STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	ESMW-26B 18 - 18.5 12/23/03	ESMW-27B 15 - 17 01/30/04	ESMW-28B 10 - 10.5 12/31/03	ESSB-A02 0 - 1 02/03/04	ESSB-C02 0 - 1 02/03/04	ESSB-C04 0 - 1 02/04/04	ESSB-E02 0 - 1 02/03/04	ESSB-E04 0 - 1 02/05/04	ESSB-E06 0 - 1 02/06/04	ESSB-G04 0 - 1 02/03/04	ESSB-G06 0 - 1 02/09/04
Semivolatile Organics												
Benzo(a)anthracene	2.1	NA	NA	NA	ND(2.1)	ND(1.9)	ND(6.5)	ND(3.4)	26	2.4 J	ND(35)	3.3
Benzo(a)pyrene	0.2	NA	NA	NA	ND(2.1)	ND(1.9)	ND(6.5)	ND(3.4)	18	2.2 J	ND(35)	2.8
Benzo(b)fluoranthene	2	NA	NA	NA	ND(2.1)	ND(1.9)	ND(6.5)	ND(3.4)	38	1.6 J	ND(35)	3.1
Inorganics												
Arsenic	11	NA	NA	NA	ND(10.2)	ND(9.00)	18.8	ND(8.30)	9.30	8.70 N	10.5	ND(8.40)
Miscellaneous Parameters												
Total Organic Carbon	--	26600	11500	5820	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 5
ELM STREET AREA NON-PCB SOIL DATA

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FOR EPA REVIEW

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	ESSB-I04 0 - 1 02/02/04	ESSB-I06 0 - 1 02/10/04	ESSB-I08 0 - 1 02/11/04	ESSB-J18 0 - 1 12/18/03	ESSB-K06 0 - 1 02/02/04	ESSB-K08 0 - 1 02/11/04	ESSB-K10 0 - 1 02/11/04	ESSB-K16 0 - 1 02/09/04	ESSB-K18 0 - 1 12/18/03	ESSB-L12 0 - 1 02/10/04	ESSB-L14 0 - 1 02/10/04
Semivolatile Organics												
Benzo(a)anthracene	2.1	ND(3.7)	1.0 [1.3]	1.1	ND(1.8)	ND(0.34)	ND(1.8)	ND(0.38)	ND(3.8)	ND(0.37)	ND(3.7)	ND(0.36)
Benzo(a)pyrene	0.2	ND(3.7)	0.96 [1.2]	1.4	ND(1.8)	ND(0.34)	ND(1.8)	0.23 J	ND(3.8)	ND(0.37)	ND(3.7)	ND(0.36)
Benzo(b)fluoranthene	2	ND(3.7)	1.1 [1.3]	1.9	ND(1.8)	ND(0.34)	ND(1.8)	0.55	ND(3.8)	ND(0.37)	ND(3.7)	ND(0.36)
Inorganics												
Arsenic	11	ND(9.60)	ND(9.80 N) [11.1]	10.3	ND(8.50)	ND(8.10)	ND(9.00)	10.0	19.8	ND(9.00)	20.9 N	15.9 N
Miscellaneous Parameters												
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 5
ELM STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	ESSB-M08 0 - 1 02/03/04	ESSB-M10 0 - 1 02/05/04	ESSB-M12 0 - 1 02/05/04	ESSB-M14 0 - 1 12/22/03	ESSB-M16 0 - 1 02/04/04	ESSB-M18 0 - 1 02/04/04	ESSB-O10 0 - 1 01/29/04	ESSB-O12 0 - 1 01/29/04	ESSB-O14 0 - 1 02/02/04	ESSB-O16 0 - 1 02/04/04
Semivolatile Organics											
Benzo(a)anthracene	2.1	ND(4.8)	ND(0.39)	2.2 J	ND(1.9)	ND(3.6)	ND(0.35)	ND(0.36)	ND(1.7)	ND(1.7)	ND(3.4) [ND(3.5)]
Benzo(a)pyrene	0.2	ND(4.8)	ND(0.39)	1.5 J	ND(1.9)	ND(3.6)	ND(0.35)	ND(0.36)	ND(1.7)	ND(1.7)	ND(3.4) [ND(3.5)]
Benzo(b)fluoranthene	2	ND(4.8)	ND(0.39)	2.5 J	ND(1.9)	ND(3.6)	ND(0.35)	ND(0.36)	ND(1.7)	ND(1.7)	ND(3.4) [ND(3.5)]
Inorganics											
Arsenic	11	ND(11.6)	27.0	ND(9.20)	13.7	ND(9.20)	ND(8.60 N)	9.20	11.0	ND(8.50 N)	14.2 [11.0]
Miscellaneous Parameters											
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 5
ELM STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	ESSB-O18 0 - 1 01/28/04	ESSB-Q10 0 - 1 01/27/04	ESSB-Q12 0 - 1 01/29/04	ESSB-Q14 0 - 1 01/22/04	ESSB-Q16 0 - 1 01/22/04	ESSB-Q18 0 - 1 01/28/04	ESSB-S12 0 - 1 01/26/04	ESSB-S14 0 - 1 01/21/04	ESSB-S16 0 - 1 01/21/04	ESSB-S18 0 - 1 01/21/04
Semivolatile Organics											
Benzo(a)anthracene	2.1	ND(0.34)	ND(3.4)	ND(0.36)	5.4	ND(3.5)	0.27 J	0.26 J [0.42]	10	ND(3.6)	ND(3.6) [ND(3.6)]
Benzo(a)pyrene	0.2	ND(0.34)	ND(3.4)	ND(0.36)	6.2	ND(3.5)	0.24 J	0.27 J [0.41]	8.2	ND(3.6)	ND(3.6) [ND(3.6)]
Benzo(b)fluoranthene	2	ND(0.34)	ND(3.4)	ND(0.36)	7.4	ND(3.5)	0.23 J	0.34 J [0.37]	8.1	ND(3.6)	ND(3.6) [ND(3.6)]
Inorganics											
Arsenic	11	ND(8.30)	10.2 N	13.5	10.5	9.70	12.7	10.3 [11.2]	11.5	ND(9.20)	ND(8.80) [ND(8.80)]
Miscellaneous Parameters											
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 5
ELM STREET AREA NON-PCB SOIL DATA

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PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	ESSB-S20 0 - 1 12/30/03	ESSB-S22 0 - 1 01/21/04	ESSB-T16 0 - 1 12/23/03	ESSS-A01 0 - 1 12/22/03	ESSS-A03 0 - 1 12/22/03	ESSS-B02 0 - 1 12/22/03	ESSS-B03 0 - 1 12/22/03	ESSS-B04 0 - 1 12/22/03	ESSS-C01 0 - 1 01/30/04	ESSS-C03 0 - 1 12/22/03	ESSS-D00 0 - 1 02/11/04
Semivolatile Organics												
Benzo(a)anthracene	2.1	1.1 J	ND(1.7)	2.3 J	ND(2.0)	ND(0.49)	ND(0.42)	ND(0.43)	ND(2.4)	ND(3.4)	ND(1.9)	0.47
Benzo(a)pyrene	0.2	1.0 J	ND(1.7)	2.0 J	ND(2.0)	ND(0.49)	ND(0.42)	ND(0.43)	ND(2.4)	ND(3.4)	ND(1.9)	0.49
Benzo(b)fluoranthene	2	1.2 J	ND(1.7)	2.2 J	ND(2.0)	ND(0.49)	ND(0.42)	ND(0.43)	ND(2.4)	ND(3.4)	ND(1.9)	0.50
Inorganics												
Arsenic	11	ND(8.90)	ND(8.70 N)	9.70	13.3	ND(12.6 N)	ND(10.6 N)	ND(10.3 N)	14.2 N	12.3	ND(9.30 N)	17.0
Miscellaneous Parameters												
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 5
ELM STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	ESSS-D01 0 - 1 01/30/04	ESSS-D02 0 - 1 12/22/03	ESSS-D03 0 - 1 12/22/03	ESSS-E01 0 - 1 01/30/04	ESSS-E03 0 - 1 12/22/03	ESSS-F02 0 - 1 01/30/04	ESSS-F04 0 - 1 12/22/03	ESSS-G03 0 - 1 01/30/04	ESSS-G05 0 - 1 12/05/03	ESSS-H02 0 - 1 12/02/03	ESSS-H03 0 - 1 12/02/03
Semivolatile Organics												
Benzo(a)anthracene	2.1	ND(3.5)	ND(2.2)	ND(39)	ND(2.1)	ND(3.7)	ND(6.8)	2.8 J [2.2 J]	ND(1.8)	ND(0.35)	ND(0.41)	0.22 J
Benzo(a)pyrene	0.2	ND(3.5)	ND(2.2)	ND(39)	ND(2.1)	ND(3.7)	ND(6.8)	2.7 J [1.9 J]	ND(1.8)	ND(0.35)	0.21 J	0.26 J
Benzo(b)fluoranthene	2	ND(3.5)	ND(2.2)	ND(39)	ND(2.1)	ND(3.7)	ND(6.8)	2.6 J [2.0 J]	ND(1.8)	ND(0.35)	0.19 J	0.29 J
Inorganics												
Arsenic	11	9.80	ND(10.9 N)	ND(9.90 N)	12.0	9.70 N	12.8	9.60 N [9.80 N]	14.3	ND(8.80)	ND(10.3 N)	ND(10.0 N)
Miscellaneous Parameters												
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 5
ELM STREET AREA NON-PCB SOIL DATA

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FOR EPA REVIEW

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	ESSS-H05 0 - 1 12/22/03	ESSS-H06 0 - 1 12/05/03	ESSS-I03 0 - 1 12/02/03	ESSS-I05 0 - 1 01/30/04	ESSS-I07 0 - 1 12/05/03	ESSS-J03 0 - 1 12/02/03	ESSS-J04 0 - 1 12/02/03	ESSS-J07 0 - 1 12/05/03	ESSS-K05 0 - 1 12/02/03	ESSS-L04 0 - 1 12/02/03	ESSS-L06 0 - 1 12/10/03
Semivolatile Organics												
Benzo(a)anthracene	2.1	ND(4.2)	ND(0.34)	ND(0.39)	ND(3.5)	ND(0.34)	ND(0.38)	ND(0.40)	0.23 J	ND(0.40) [ND(0.40)]	ND(0.41)	ND(1.7)
Benzo(a)pyrene	0.2	ND(4.2)	ND(0.34)	ND(0.39)	ND(3.5)	ND(0.34)	ND(0.38)	0.20 J	0.27 J	ND(0.40) [ND(0.40)]	ND(0.41)	ND(1.7)
Benzo(b)fluoranthene	2	ND(4.2)	ND(0.34)	ND(0.39)	ND(3.5)	ND(0.34)	ND(0.38)	0.22 J	0.24 J	ND(0.40) [ND(0.40)]	ND(0.41)	ND(1.7)
Inorganics												
Arsenic	11	ND(10.0 N)	ND(8.60)	ND(9.20 N)	11.0	9.40	ND(9.90 N)	ND(9.70 N)	ND(8.60)	11.6 N [12.5 N]	ND(10.2 N)	9.20
Miscellaneous Parameters												
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 5
ELM STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	ESSS-L15 0 - 1 01/28/04	ESSS-L16 0 - 1 01/28/04	ESSS-L17 0 - 1 01/28/04	ESSS-L18 0 - 1 01/28/04	ESSS-M05 0 - 1 12/02/03	ESSS-M07 0 - 1 12/10/03	ESSS-M17 0 - 1 01/28/04	ESSS-N06 0 - 1 12/02/03	ESSS-N18 0 - 1 01/28/04	ESSS-O07 0 - 1 12/10/03	ESSS-P07 0 - 1 12/10/03
Semivolatile Organics												
Benzo(a)anthracene	2.1	ND(0.36)	ND(0.36)	ND(0.42)	ND(0.34)	ND(0.36)	ND(1.7)	ND(0.33)	0.34 J	ND(0.34)	2.0	ND(1.7)
Benzo(a)pyrene	0.2	ND(0.36)	ND(0.36)	ND(0.42)	ND(0.34)	ND(0.36)	ND(1.7)	ND(0.33)	0.23 J	ND(0.34)	2.0	1.0 J
Benzo(b)fluoranthene	2	ND(0.36)	ND(0.36)	ND(0.42)	ND(0.34)	ND(0.36)	ND(1.7)	ND(0.33)	0.25 J	ND(0.34)	2.4	1.0 J
Inorganics												
Arsenic	11	ND(8.40)	19.2	ND(10.5)	ND(8.30)	ND(8.70 N)	8.90	8.00	ND(9.90 N)	13.4	14.2	ND(8.60)
Miscellaneous Parameters												
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 5
ELM STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	ESSS-P08 0 - 1 12/10/03	ESSS-P17 0 - 1 01/20/04	ESSS-P18 0 - 1 01/28/04	ESSS-Q09 0 - 1 12/10/03	ESSS-Q17 0 - 1 01/20/04	ESSS-R08 0 - 1 12/10/03	ESSS-R09 0 - 1 12/10/03	ESSS-R10 0 - 1 01/20/04	ESSS-R11 0 - 1 01/20/04	ESSS-R17 0 - 1 01/20/04	ESSS-R18 0 - 1 01/27/04
Semivolatile Organics												
Benzo(a)anthracene	2.1	ND(2.2)	ND(1.8)	0.19 J	ND(1.7)	ND(3.3)	ND(1.7)	ND(1.7)	ND(35)	ND(0.36)	ND(0.33)	12
Benzo(a)pyrene	0.2	ND(2.2)	ND(1.8)	0.15 J	ND(1.7)	ND(3.3)	ND(1.7)	ND(1.7)	ND(35)	ND(0.36)	ND(0.33)	10
Benzo(b)fluoranthene	2	ND(2.2)	ND(1.8)	ND(0.33)	ND(1.7)	ND(3.3)	ND(1.7)	ND(1.7)	ND(35)	ND(0.36)	ND(0.33)	13
Inorganics												
Arsenic	11	14.9	9.40	ND(8.10)	16.0	ND(8.40)	16.3	13.9	11.7	ND(8.50)	28.7	ND(8.30 N)
Miscellaneous Parameters												
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 5
ELM STREET AREA NON-PCB SOIL DATA

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FOR EPA REVIEW

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	ESSS-R19 0 - 1 01/27/04	ESSS-R20 0 - 1 01/27/04	ESSS-R21 0 - 1 01/27/04	ESSS-R22 0 - 1 01/27/04	ESSS-S11 0 - 1 01/19/04	ESSS-S13 0 - 1 01/19/04	ESSS-S17 0 - 1 01/19/04	ESSS-T15 0 - 1 01/23/04	ESSS-T17 0 - 1 01/23/04	ESSS-T18 0 - 1 01/23/04	ESSS-T19 0 - 1 01/23/04
Semivolatile Organics												
Benzo(a)anthracene	2.1	ND(0.34)	ND(0.35)	ND(0.34)	ND(1.8)	ND(3.7)	11	ND(0.34)	ND(3.6)	100 E	ND(3.8)	11
Benzo(a)pyrene	0.2	ND(0.34)	ND(0.35)	ND(0.34)	ND(1.8)	ND(3.7)	8.7	ND(0.34)	ND(3.6)	91 E	ND(3.8)	11
Benzo(b)fluoranthene	2	ND(0.34)	ND(0.35)	ND(0.34)	ND(1.8)	ND(3.7)	10	ND(0.34)	ND(3.6)	110 E	ND(3.8)	12
Inorganics												
Arsenic	11	ND(8.20 N)	ND(8.30 N)	ND(8.50 N)	10.0 N	17.3	ND(9.00)	10.2	13.9	8.90	17.2	ND(8.70)
Miscellaneous Parameters												
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 5
ELM STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	ESSS-T20 0 - 1 01/23/04
Semivolatile Organics		
Benzo(a)anthracene	2.1	4.2
Benzo(a)pyrene	0.2	4.6
Benzo(b)fluoranthene	2	5.5
Inorganics		
Arsenic	11	ND(9.40)
Miscellaneous Parameters		
Total Organic Carbon	--	NA

TABLE 5
ELM STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Notes:
1. Samples were collected by Blasland Bouck & Lee, Inc., and submitted to Severn Trent Laboratories, Inc. for analysis of SVOCs, arsenic and total organic carbon.
2. NA - Not Analyzed.
3. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
4. Field duplicate sample results are presented in brackets.
5. In the areas where temporary cover materials have been placed (e.g., geotextile and soil cover), the 0- to 1-foot surface soil sampling interval will begin at the depth of the geotextile installed by EPA, which is considered to represent the boundary between clean barrier soils and native Site soils.
6. -- Indicates no corresponding performance standard for this constituent.
7. - Indicates detection limit which is greater than the performance standard of the associated constituent.
8. - Indicates exceedance of performance standard.

Data Qualifiers:

Organics (semivolatiles)
B - Analyte was also detected in the associated method blank.
D - Compound quantitated using a secondary dilution.
E - Analyte exceeded calibration range.
J - Indicates an estimated value less than the practical quantitation limit (PQL).

Inorganics
N - Indicates sample matrix spike analysis was outside control limits.

Table 6

Mill Street Area Non-PCB Soil Data

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

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PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSMW-22A 5.5 - 6 01/14/04	MSMW-22A 13 - 15 01/27/04	MSMW-22A 13 - 15 02/11/04	MSMW-22A 15 - 17 01/27/04	MSMW-22A 17 - 19 01/27/04	MSMW-22B 4 - 6 01/28/04	MSMW-22B 6 - 8 01/28/04	MSMW-22B 8 - 10 01/28/04	MSMW-23A 17 - 19 01/22/04	MSMW-23A 19 - 21 01/22/04
Volatile Organics											
1,1,1-Trichloroethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,1,2,2-Tetrachloroethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,1,2-Trichloro-1,2,2-trifluoroethai	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,1,2-Trichloroethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,1-Dichloroethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,1-Dichloroethene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,2 Dichloroethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,2,4 Trichlorobenzene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,2-Dibromo-3-chloropropane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,2-Dibromoethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,2-Dichlorobenzene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,2-Dichloropropane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,3-Dichlorobenzene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
1,4-Dichlorobenzene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
2-Butanone	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
2-Hexanone	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
4-Methyl-2-pentanone	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Acetone	--	NA	NA	ND(0.035)	ND(0.029)	ND(0.034)	ND(0.037)	ND(0.027)	ND(0.030)	ND(0.029)	ND(0.028)
Benzene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Bromodichloromethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Bromoform	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Bromomethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Carbon Disulfide	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Carbon Tetrachloride	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Chlorobenzene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Chloroethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Chloroform	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Chloromethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
cis-1,2-Dichloroethene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
cis-1,3-Dichloropropene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Cyclohexane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Dibromochloromethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Dichlorodifluoromethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Ethylbenzene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Isopropylbenzene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Methyl acetate	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Methyl tert butyl ether	--	NA	NA	0.0010 J	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Methylcyclohexane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Methylene Chloride	--	NA	NA	ND(0.012)	0.0050 J	0.010 J	0.0070 J	0.0040 J	0.0040 J	0.0060 J	0.0050 J
Styrene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Tetrachloroethene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Toluene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
trans-1,2-Dichloroethene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
trans-1,3-Dichloropropene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

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FOR EPA REVIEW

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSMW-22A 5.5 - 6 01/14/04	MSMW-22A 13 - 15 01/27/04	MSMW-22A 13 - 15 02/11/04	MSMW-22A 15 - 17 01/27/04	MSMW-22A 17 - 19 01/27/04	MSMW-22B 4 - 6 01/28/04	MSMW-22B 6 - 8 01/28/04	MSMW-22B 8 - 10 01/28/04	MSMW-23A 17 - 19 01/22/04	MSMW-23A 19 - 21 01/22/04
Trichloroethene	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	0.0010 J	ND(0.010)	ND(0.010)	ND(0.010)
Trichlorofluoromethane	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Vinyl acetate	--	NA	NA	NA	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Vinyl chloride	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Xylenes,Total	--	NA	NA	ND(0.012)	ND(0.010)	ND(0.011)	ND(0.012)	ND(0.0090)	ND(0.010)	ND(0.010)	ND(0.010)
Semivolatile Organics											
2,2'-Oxybis(1-Chloropropane)	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
2,4,5-Trichlorophenol	--	NA	ND(0.92)	NA	ND(0.94)	ND(0.91)	ND(1.0)	ND(0.98)	ND(0.89)	ND(0.91)	NA
2,4,6-Trichlorophenol	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
2,4-Dichlorophenol	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
2,4-Dimethylphenol	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
2,4-Dinitrophenol	--	NA	ND(1.6)	NA	ND(1.7)	ND(1.6)	ND(1.8)	ND(1.7)	ND(1.6)	ND(1.6)	NA
2,4-Dinitrotoluene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
2,6-Dinitrotoluene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
2-Chloronaphthalene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
2-Chlorophenol	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
2-Methylnaphthalene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
2-Methylphenol	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
2-Nitroaniline	--	NA	ND(0.92)	NA	ND(0.94)	ND(0.91)	ND(1.0)	ND(0.98)	ND(0.89)	ND(0.91)	NA
2-Nitrophenol	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
3,3'-Dichlorobenzidine	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
3-Nitroaniline	--	NA	ND(0.92)	NA	ND(0.94)	ND(0.91)	ND(1.0)	ND(0.98)	ND(0.89)	ND(0.91)	NA
4,6-Dinitro-2-methylphenol	--	NA	ND(0.92)	NA	ND(0.94)	ND(0.91)	ND(1.0)	ND(0.98)	ND(0.89)	ND(0.91)	NA
4-Bromophenyl phenyl ether	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
4-Chloro-3-methylphenol	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
4-Chloroaniline	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
4-Chlorophenyl phenyl ether	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
4-Methylphenol	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
4-Nitroaniline	--	NA	ND(0.92)	NA	ND(0.94)	ND(0.91)	ND(1.0)	ND(0.98)	ND(0.89)	ND(0.91)	NA
4-Nitrophenol	--	NA	ND(0.92)	NA	ND(0.94)	ND(0.91)	ND(1.0)	ND(0.98)	ND(0.89)	ND(0.91)	NA
Acenaphthene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Acenaphthylene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Acetophenone	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Anthracene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Atrazine	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Benzaldehyde	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Benzo(a)anthracene	2.1	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Benzo(a)pyrene	0.2	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Benzo(b)fluoranthene	2	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Benzo(g,h,i)perylene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Benzo(k)fluoranthene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Biphenyl	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Bis(2-chloroethoxy) methane	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Bis(2-chloroethyl) ether	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
bis(2-Ethylhexyl)phthalate	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSMW-22A 5.5 - 6 01/14/04	MSMW-22A 13 - 15 01/27/04	MSMW-22A 13 - 15 02/11/04	MSMW-22A 15 - 17 01/27/04	MSMW-22A 17 - 19 01/27/04	MSMW-22B 4 - 6 01/28/04	MSMW-22B 6 - 8 01/28/04	MSMW-22B 8 - 10 01/28/04	MSMW-23A 17 - 19 01/22/04	MSMW-23A 19 - 21 01/22/04
Butyl benzyl phthalate	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Caprolactam	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Carbazole	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Chrysene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Di-n-Butylphthalate	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Di-n-Octylphthalate	--	NA	ND(0.50)	NA	ND(0.51)	ND(0.49)	ND(0.55)	ND(0.52)	ND(0.48)	ND(0.49)	NA
Dibenz(a,h)anthracene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Dibenzofuran	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Diethyl phthalate	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Dimethyl phthalate	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Fluoranthene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	0.20 J	ND(0.36)	ND(0.36)	NA
Fluorene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Hexachlorobenzene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Hexachlorobutadiene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Hexachlorocyclopentadiene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Hexachloroethane	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Indeno(1,2,3-c,d)pyrene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Isophorone	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
N-Nitroso-Di-n-propylamine	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
N-Nitrosodiphenylamine (1)	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Naphthalene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	0.24 J	ND(0.36)	ND(0.36)	NA
Nitrobenzene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Pentachlorophenol	--	NA	ND(0.92)	NA	ND(0.94)	ND(0.91)	ND(1.0)	ND(0.98)	ND(0.89)	ND(0.91)	NA
Phenanthrene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	0.12 J	ND(0.36)	ND(0.36)	NA
Phenol	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	ND(0.39)	ND(0.36)	ND(0.36)	NA
Pyrene	--	NA	ND(0.37)	NA	ND(0.38)	ND(0.36)	ND(0.41)	0.17 J	ND(0.36)	ND(0.36)	NA
Inorganics											
Arsenic	11	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Miscellaneous Parameters											
Total Organic Carbon	--	3900	1220	NA	661	781	6680	9670	1450	1140	1000

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSMW-23A 21 - 23 01/22/04	MSMW-23B 9 - 11 01/26/04	MSMW-23B 11 - 13 01/26/04	MSMW-23B 13 - 15 01/26/04	MSMW-23B 19 - 21 01/26/04	MSMW-23C 0 - 1 01/20/04	MSMW-24A 9 - 11 01/06/04	MSMW-24A 17 - 19 01/06/04	MSMW-24A 19 - 21 01/06/04	MSMW-24A 21 - 23 01/06/04
Volatile Organics											
1,1,1-Trichloroethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,1,2,2-Tetrachloroethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,1,2-Trichloro-1,2,2-trifluoroetha	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,1,2-Trichloroethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,1-Dichloroethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,1-Dichloroethene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,2 Dichloroethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,2,4 Trichlorobenzene	--	ND(0.014)	ND(0.010)	ND(0.010)	0.0070 J	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,2-Dibromo-3-chloropropane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,2-Dibromoethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,2-Dichlorobenzene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,2-Dichloropropane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,3-Dichlorobenzene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
1,4-Dichlorobenzene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
2-Butanone	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
2-Hexanone	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
4-Methyl-2-pentanone	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Acetone	--	ND(0.041)	ND(0.030)	ND(0.030)	ND(0.034)	NA	NA	NA	ND(0.035)	ND(0.028)	ND(0.031)
Benzene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Bromodichloromethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Bromoform	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Bromomethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Carbon Disulfide	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Carbon Tetrachloride	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Chlorobenzene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Chloroethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Chloroform	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Chloromethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
cis-1,2-Dichloroethene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
cis-1,3-Dichloropropene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Cyclohexane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Dibromochloromethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Dichlorodifluoromethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Ethylbenzene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Isopropylbenzene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Methyl acetate	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Methyl tert butyl ether	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Methylcyclohexane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Methylene Chloride	--	0.0080 J	0.0060 J	0.0070 J	0.0070 J	NA	NA	NA	0.018 B	0.0080 BJ	0.033 B
Styrene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Tetrachloroethene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Toluene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
trans-1,2-Dichloroethene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
trans-1,3-Dichloropropene	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSMW-23A 21 - 23 01/22/04	MSMW-23B 9 - 11 01/26/04	MSMW-23B 11 - 13 01/26/04	MSMW-23B 13 - 15 01/26/04	MSMW-23B 19 - 21 01/26/04	MSMW-23C 0 - 1 01/20/04	MSMW-24A 9 - 11 01/06/04	MSMW-24A 17 - 19 01/06/04	MSMW-24A 19 - 21 01/06/04	MSMW-24A 21 - 23 01/06/04
Trichloroethene	--	ND(0.014)	ND(0.010)	ND(0.010)	0.0070 J	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Trichlorofluoromethane	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Vinyl acetate	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Vinyl chloride	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Xylenes,Total	--	ND(0.014)	ND(0.010)	ND(0.010)	ND(0.011)	NA	NA	NA	ND(0.012)	ND(0.0090)	ND(0.010)
Semivolatile Organics											
2,2'-Oxybis(1-Chloropropane)	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
2,4,5-Trichlorophenol	--	ND(0.97)	ND(0.98)	ND(0.88)	ND(0.95)	ND(0.98)	NA	NA	ND(0.93)	ND(0.90)	ND(0.87)
2,4,6-Trichlorophenol	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
2,4-Dichlorophenol	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
2,4-Dimethylphenol	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
2,4-Dinitrophenol	--	ND(1.7)	ND(1.7)	ND(1.6)	ND(1.7)	ND(1.7)	NA	NA	ND(1.6)	ND(1.6)	ND(1.5)
2,4-Dinitrotoluene	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
2,6-Dinitrotoluene	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
2-Chloronaphthalene	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
2-Chlorophenol	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
2-Methylnaphthalene	--	ND(0.38)	0.16 J	0.91	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
2-Methylphenol	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
2-Nitroaniline	--	ND(0.97)	ND(0.98)	ND(0.88)	ND(0.95)	ND(0.98)	NA	NA	ND(0.93)	ND(0.90)	ND(0.87)
2-Nitrophenol	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
3,3'-Dichlorobenzidine	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
3-Nitroaniline	--	ND(0.97)	ND(0.98)	ND(0.88)	ND(0.95)	ND(0.98)	NA	NA	ND(0.93)	ND(0.90)	ND(0.87)
4,6-Dinitro-2-methylphenol	--	ND(0.97)	ND(0.98)	ND(0.88)	ND(0.95)	ND(0.98)	NA	NA	ND(0.93)	ND(0.90)	ND(0.87)
4-Bromophenyl phenyl ether	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
4-Chloro-3-methylphenol	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
4-Chloroaniline	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
4-Chlorophenyl phenyl ether	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
4-Methylphenol	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
4-Nitroaniline	--	ND(0.97)	ND(0.98)	ND(0.88)	ND(0.95)	ND(0.98)	NA	NA	ND(0.93)	ND(0.90)	ND(0.87)
4-Nitrophenol	--	ND(0.97)	ND(0.98)	ND(0.88)	ND(0.95)	ND(0.98)	NA	NA	ND(0.93)	ND(0.90)	ND(0.87)
Acenaphthene	--	ND(0.38)	ND(0.39)	0.36	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Acenaphthylene	--	ND(0.38)	0.18 J	1.1	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Acetophenone	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Anthracene	--	ND(0.38)	0.22 J	1.5	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Atrazine	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Benzaldehyde	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Benzo(a)anthracene	2.1	ND(0.38)	0.32 J	2.6	ND(0.38)	ND(0.39)	17	NA	ND(0.37)	ND(0.36)	ND(0.35)
Benzo(a)pyrene	0.2	ND(0.38)	0.24 J	1.7	ND(0.38)	ND(0.39)	14	NA	ND(0.37)	ND(0.36)	ND(0.35)
Benzo(b)fluoranthene	2	ND(0.38)	0.26 J	1.7	ND(0.38)	ND(0.39)	17	NA	ND(0.37)	ND(0.36)	ND(0.35)
Benzo(g,h,i)perylene	--	ND(0.38)	ND(0.39)	0.76	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Benzo(k)fluoranthene	--	ND(0.38)	0.19 J	1.5	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Biphenyl	--	ND(0.38)	ND(0.39)	0.18 J	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Bis(2-chloroethoxy) methane	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Bis(2-chloroethyl) ether	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
bis(2-Ethylhexyl)phthalate	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSMW-23A 21 - 23 01/22/04	MSMW-23B 9 - 11 01/26/04	MSMW-23B 11 - 13 01/26/04	MSMW-23B 13 - 15 01/26/04	MSMW-23B 19 - 21 01/26/04	MSMW-23C 0 - 1 01/20/04	MSMW-24A 9 - 11 01/06/04	MSMW-24A 17 - 19 01/06/04	MSMW-24A 19 - 21 01/06/04	MSMW-24A 21 - 23 01/06/04
Butyl benzyl phthalate	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Caprolactam	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Carbazole	--	ND(0.38)	0.15 J	0.96	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Chrysene	--	ND(0.38)	0.32 J	2.5	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Di-n-Butylphthalate	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Di-n-Octylphthalate	--	ND(0.52)	ND(0.52)	ND(0.48)	ND(0.51)	ND(0.53)	NA	NA	ND(0.50)	ND(0.48)	ND(0.47)
Dibenz(a,h)anthracene	--	ND(0.38)	ND(0.39)	0.33 J	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Dibenzofuran	--	ND(0.38)	0.14 J	0.79	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Diethyl phthalate	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Dimethyl phthalate	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Fluoranthene	--	ND(0.38)	0.77	5.9 E	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Fluorene	--	ND(0.38)	0.22 J	1.4	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Hexachlorobenzene	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Hexachlorobutadiene	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Hexachlorocyclopentadiene	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Hexachloroethane	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Indeno(1,2,3-c,d)pyrene	--	ND(0.38)	ND(0.39)	0.81	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Isophorone	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
N-Nitroso-Di-n-propylamine	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
N-Nitrosodiphenylamine (1)	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Naphthalene	--	ND(0.38)	0.14 J	0.93	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Nitrobenzene	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Pentachlorophenol	--	ND(0.97)	ND(0.98)	ND(0.88)	ND(0.95)	ND(0.98)	NA	NA	ND(0.93)	ND(0.90)	ND(0.87)
Phenanthrene	--	ND(0.38)	1.2	7.8 E	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Phenol	--	ND(0.38)	ND(0.39)	ND(0.35)	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Pyrene	--	ND(0.38)	0.61	4.7	ND(0.38)	ND(0.39)	NA	NA	ND(0.37)	ND(0.36)	ND(0.35)
Inorganics											
Arsenic	11	NA	NA	NA	NA	NA	56.8	NA	NA	NA	NA
Miscellaneous Parameters											
Total Organic Carbon	--	1660	12900	5050	1760	NA	NA	6860	1200	1130	865

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSMW-24B 9 - 11 01/07/04	MSMW-24B 11 - 13 01/07/04	MSMW-24B 13 - 15 01/08/04	MSMW-24C 0 - 1 01/05/04	MSMW-25C 6.5 - 7 12/23/03	MSSB-B07 0 - 1 02/18/04	MSSB-B09 0 - 1 02/19/04	MSSB-B11 0 - 1 02/18/04	MSSB-B13 0 - 1 02/12/04	MSSB-B15 0 - 1 02/12/04
Volatile Organics											
1,1,1-Trichloroethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,1,2,2-Tetrachloroethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,1,2-Trichloro-1,2,2-trifluoroetha	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,1,2-Trichloroethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,1-Dichloroethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,1-Dichloroethene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,2 Dichloroethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,2,4 Trichlorobenzene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,2-Dibromo-3-chloropropane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,2-Dibromoethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,2-Dichloropropane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
2-Butanone	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
2-Hexanone	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
4-Methyl-2-pentanone	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Acetone	--	ND(0.031)	ND(0.032)	ND(0.031)	NA	NA	NA	NA	NA	NA	NA
Benzene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Bromodichloromethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Bromoform	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Bromomethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Carbon Disulfide	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Carbon Tetrachloride	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Chloroethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Chloroform	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Chloromethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
cis-1,2-Dichloroethene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
cis-1,3-Dichloropropene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Cyclohexane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Dibromochloromethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Dichlorodifluoromethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Methyl acetate	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Methyl tert butyl ether	--	ND(0.010)	ND(0.010)	0.0040 J	NA	NA	NA	NA	NA	NA	NA
Methylcyclohexane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	--	0.010 B	0.010 B	0.011 B	NA	NA	NA	NA	NA	NA	NA
Styrene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Toluene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
trans-1,2-Dichloroethene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
trans-1,3-Dichloropropene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	MSMW-24B 9 - 11 01/07/04	MSMW-24B 11 - 13 01/07/04	MSMW-24B 13 - 15 01/08/04	MSMW-24C 0 - 1 01/05/04	MSMW-25C 6.5 - 7 12/23/03	MSSB-B07 0 - 1 02/18/04	MSSB-B09 0 - 1 02/19/04	MSSB-B11 0 - 1 02/18/04	MSSB-B13 0 - 1 02/12/04	MSSB-B15 0 - 1 02/12/04
Trichloroethene	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Trichlorofluoromethane	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Vinyl acetate	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Vinyl chloride	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Xylenes,Total	--	ND(0.010)	ND(0.010)	ND(0.010)	NA	NA	NA	NA	NA	NA	NA
Semivolatile Organics											
2,2'-Oxybis(1-Chloropropane)	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
2,4,5-Trichlorophenol	--	ND(0.93)	ND(1.0)	ND(0.88)	NA	NA	NA	NA	NA	NA	NA
2,4,6-Trichlorophenol	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
2,4-Dichlorophenol	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
2,4-Dimethylphenol	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
2,4-Dinitrophenol	--	ND(1.6)	ND(1.8)	ND(1.5)	NA	NA	NA	NA	NA	NA	NA
2,4-Dinitrotoluene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
2,6-Dinitrotoluene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
2-Chloronaphthalene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
2-Chlorophenol	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
2-Methylnaphthalene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
2-Methylphenol	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
2-Nitroaniline	--	ND(0.93)	ND(1.0)	ND(0.88)	NA	NA	NA	NA	NA	NA	NA
2-Nitrophenol	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
3,3'-Dichlorobenzidine	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
3-Nitroaniline	--	ND(0.93)	ND(1.0)	ND(0.88)	NA	NA	NA	NA	NA	NA	NA
4,6-Dinitro-2-methylphenol	--	ND(0.93)	ND(1.0)	ND(0.88)	NA	NA	NA	NA	NA	NA	NA
4-Bromophenyl phenyl ether	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
4-Chloro-3-methylphenol	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
4-Chloroaniline	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
4-Chlorophenyl phenyl ether	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
4-Methylphenol	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
4-Nitroaniline	--	ND(0.93)	ND(1.0)	ND(0.88)	NA	NA	NA	NA	NA	NA	NA
4-Nitrophenol	--	ND(0.93)	ND(1.0)	ND(0.88)	NA	NA	NA	NA	NA	NA	NA
Acenaphthene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Acenaphthylene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Acetophenone	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Anthracene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Atrazine	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Benzaldehyde	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Benzo(a)anthracene	2.1	ND(0.37)	ND(0.40)	ND(0.35)	13	NA	ND(3.6)	2.9 J	4.7	21	ND(3.6)
Benzo(a)pyrene	0.2	ND(0.37)	ND(0.40)	ND(0.35)	5.9	NA	ND(3.6)	2.0 J	2.9 J	19	ND(3.6)
Benzo(b)fluoranthene	2	ND(0.37)	ND(0.40)	ND(0.35)	7.6	NA	ND(3.6)	2.9 J	3.4 J	18	ND(3.6)
Benzo(g,h,i)perylene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Benzo(k)fluoranthene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Biphenyl	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Bis(2-chloroethoxy) methane	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Bis(2-chloroethyl) ether	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
bis(2-Ethylhexyl)phthalate	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSMW-24B 9 - 11 01/07/04	MSMW-24B 11 - 13 01/07/04	MSMW-24B 13 - 15 01/08/04	MSMW-24C 0 - 1 01/05/04	MSMW-25C 6.5 - 7 12/23/03	MSSB-B07 0 - 1 02/18/04	MSSB-B09 0 - 1 02/19/04	MSSB-B11 0 - 1 02/18/04	MSSB-B13 0 - 1 02/12/04	MSSB-B15 0 - 1 02/12/04
Butyl benzyl phthalate	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Caprolactam	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Carbazole	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Chrysene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Di-n-Butylphthalate	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Di-n-Octylphthalate	--	ND(0.50)	ND(0.55)	ND(0.47)	NA	NA	NA	NA	NA	NA	NA
Dibenz(a,h)anthracene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Dibenzofuran	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Diethyl phthalate	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Dimethyl phthalate	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Fluorene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Hexachlorobenzene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Hexachlorobutadiene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Hexachlorocyclopentadiene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Hexachloroethane	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Indeno(1,2,3-c,d)pyrene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Isophorone	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
N-Nitroso-Di-n-propylamine	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
N-Nitrosodiphenylamine (1)	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Naphthalene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Nitrobenzene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Pentachlorophenol	--	ND(0.93)	ND(1.0)	ND(0.88)	NA	NA	NA	NA	NA	NA	NA
Phenanthrene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Phenol	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Pyrene	--	ND(0.37)	ND(0.40)	ND(0.35)	NA	NA	NA	NA	NA	NA	NA
Inorganics											
Arsenic	11	NA	NA	NA	18.9	NA	69.4	39.4 N	24.0	27.1 N	12.6
Miscellaneous Parameters											
Total Organic Carbon	--	4360	3830	2440	NA	942	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-B17 0 - 1 02/12/04	MSSB-C01 0 - 1 01/13/04	MSSB-C01 10 - 12 01/13/04	MSSB-C03 0 - 1 01/20/04	MSSB-C03 13 - 15 01/20/04	MSSB-C05 0 - 1 01/06/04	MSSB-C05 4 - 6 01/06/04	MSSB-C07 0 - 1 01/06/04	MSSB-C07 4 - 6 01/06/04	MSSB-C09 0 - 1 01/13/04
Volatile Organics											
1,1,1-Trichloroethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,1,2,2-Tetrachloroethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,1,2-Trichloro-1,2,2-trifluoroetha	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,1,2-Trichloroethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,1-Dichloroethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,1-Dichloroethene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,2 Dichloroethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,2,4 Trichlorobenzene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,2-Dibromo-3-chloropropane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,2-Dibromoethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,2-Dichlorobenzene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,2-Dichloropropane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,3-Dichlorobenzene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
1,4-Dichlorobenzene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
2-Butanone	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
2-Hexanone	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
4-Methyl-2-pentanone	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Acetone	--	NA	NA	0.019 J	NA	ND(0.029) [ND(0.029)]	NA	0.013 J	NA	ND(0.031)	NA
Benzene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Bromodichloromethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Bromoform	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Bromomethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Carbon Disulfide	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Carbon Tetrachloride	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Chlorobenzene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Chloroethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Chloroform	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Chloromethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
cis-1,2-Dichloroethene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
cis-1,3-Dichloropropene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Cyclohexane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Dibromochloromethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Dichlorodifluoromethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Ethylbenzene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Isopropylbenzene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Methyl acetate	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Methyl tert butyl ether	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Methylcyclohexane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Methylene Chloride	--	NA	NA	0.014	NA	ND(0.010) [ND(0.010)]	NA	0.0070 BJ	NA	0.0080 BJ	NA
Styrene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Tetrachloroethene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Toluene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
trans-1,2-Dichloroethene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
trans-1,3-Dichloropropene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-B17 0 - 1 02/12/04	MSSB-C01 0 - 1 01/13/04	MSSB-C01 10 - 12 01/13/04	MSSB-C03 0 - 1 01/20/04	MSSB-C03 13 - 15 01/20/04	MSSB-C05 0 - 1 01/06/04	MSSB-C05 4 - 6 01/06/04	MSSB-C07 0 - 1 01/06/04	MSSB-C07 4 - 6 01/06/04	MSSB-C09 0 - 1 01/13/04
Trichloroethene	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Trichlorofluoromethane	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Vinyl acetate	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Vinyl chloride	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Xylenes,Total	--	NA	NA	ND(0.014)	NA	ND(0.010) [ND(0.010)]	NA	ND(0.010)	NA	ND(0.010)	NA
Semivolatile Organics											
2,2'-Oxybis(1-Chloropropane)	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
2,4,5-Trichlorophenol	--	NA	NA	ND(1.2)	NA	ND(0.93) [ND(0.93)]	NA	ND(0.90)	NA	ND(0.88)	NA
2,4,6-Trichlorophenol	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
2,4-Dichlorophenol	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
2,4-Dimethylphenol	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
2,4-Dinitrophenol	--	NA	NA	ND(2.1)	NA	ND(1.6) [ND(1.6)]	NA	ND(1.6)	NA	ND(1.5)	NA
2,4-Dinitrotoluene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
2,6-Dinitrotoluene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
2-Chloronaphthalene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
2-Chlorophenol	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
2-Methylnaphthalene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
2-Methylphenol	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
2-Nitroaniline	--	NA	NA	ND(1.2)	NA	ND(0.93) [ND(0.93)]	NA	ND(0.90)	NA	ND(0.88)	NA
2-Nitrophenol	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
3,3'-Dichlorobenzidine	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
3-Nitroaniline	--	NA	NA	ND(1.2)	NA	ND(0.93) [ND(0.93)]	NA	ND(0.90)	NA	ND(0.88)	NA
4,6-Dinitro-2-methylphenol	--	NA	NA	ND(1.2)	NA	ND(0.93) [ND(0.93)]	NA	ND(0.90)	NA	ND(0.88)	NA
4-Bromophenyl phenyl ether	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
4-Chloro-3-methylphenol	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
4-Chloroaniline	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
4-Chlorophenyl phenyl ether	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
4-Methylphenol	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
4-Nitroaniline	--	NA	NA	ND(1.2)	NA	ND(0.93) [ND(0.93)]	NA	ND(0.90)	NA	ND(0.88)	NA
4-Nitrophenol	--	NA	NA	ND(1.2)	NA	ND(0.93) [ND(0.93)]	NA	ND(0.90)	NA	ND(0.88)	NA
Acenaphthene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Acenaphthylene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Acetophenone	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Anthracene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Atrazine	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Benzaldehyde	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Benzo(a)anthracene	2.1	ND(1.7)	ND(3.7)	ND(0.47)	3.1 J	ND(0.37) [ND(0.37)]	ND(1.9)	ND(0.36)	ND(1.9)	ND(0.35)	ND(0.40)
Benzo(a)pyrene	0.2	ND(1.7)	ND(3.7)	ND(0.47)	2.3 J	ND(0.37) [ND(0.37)]	ND(1.9)	ND(0.36)	ND(1.9)	ND(0.35)	ND(0.40)
Benzo(b)fluoranthene	2	ND(1.7)	ND(3.7)	ND(0.47)	4.5	ND(0.37) [ND(0.37)]	ND(1.9)	ND(0.36)	ND(1.9)	ND(0.35)	ND(0.40)
Benzo(g,h,i)perylene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Benzo(k)fluoranthene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Biphenyl	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Bis(2-chloroethoxy) methane	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Bis(2-chloroethyl) ether	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
bis(2-Ethylhexyl)phthalate	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-B17 0 - 1 02/12/04	MSSB-C01 0 - 1 01/13/04	MSSB-C01 10 - 12 01/13/04	MSSB-C03 0 - 1 01/20/04	MSSB-C03 13 - 15 01/20/04	MSSB-C05 0 - 1 01/06/04	MSSB-C05 4 - 6 01/06/04	MSSB-C07 0 - 1 01/06/04	MSSB-C07 4 - 6 01/06/04	MSSB-C09 0 - 1 01/13/04
Butyl benzyl phthalate	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Caprolactam	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Carbazole	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Chrysene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Di-n-Butylphthalate	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Di-n-Octylphthalate	--	NA	NA	ND(0.64)	NA	ND(0.50) [ND(0.50)]	NA	ND(0.48)	NA	ND(0.47)	NA
Dibenz(a,h)anthracene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Dibenzofuran	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Diethyl phthalate	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Dimethyl phthalate	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Fluoranthene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Fluorene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Hexachlorobenzene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Hexachlorobutadiene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Hexachlorocyclopentadiene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Hexachloroethane	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Indeno(1,2,3-c,d)pyrene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Isophorone	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
N-Nitroso-Di-n-propylamine	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
N-Nitrosodiphenylamine (1)	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Naphthalene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Nitrobenzene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Pentachlorophenol	--	NA	NA	ND(1.2)	NA	ND(0.93) [ND(0.93)]	NA	ND(0.90)	NA	ND(0.88)	NA
Phenanthrene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Phenol	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Pyrene	--	NA	NA	ND(0.47)	NA	ND(0.37) [ND(0.37)]	NA	ND(0.36)	NA	ND(0.35)	NA
Inorganics											
Arsenic	11	ND(8.10)	38.5	NA	ND(9.60)	NA	ND(8.90)	NA	ND(9.40)	NA	ND(9.90)
Miscellaneous Parameters											
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-C11 0 - 1 01/08/04	MSSB-C11 8 - 10 01/08/04	MSSB-C13 0 - 1 01/08/04	MSSB-C13 6 - 8 01/08/04	MSSB-C15 0 - 1 01/06/04	MSSB-C15 10 - 12 01/06/04	MSSB-C17 0 - 1 01/07/04	MSSB-C17 9 - 11 01/07/04	MSSB-C19 0 - 1 01/07/04	MSSB-C19 9 - 11 01/07/04	MSSB-D17 0 - 1 12/17/03
Volatile Organics												
1,1,1-Trichloroethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,1,2,2-Tetrachloroethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,1,2-Trichloro-1,2,2-trifluoroetha	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,1,2-Trichloroethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,1-Dichloroethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,1-Dichloroethene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,2 Dichloroethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,2,4 Trichlorobenzene	--	NA	ND(0.010)	NA	0.36 E	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,2-Dibromo-3-chloropropane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,2-Dibromoethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,2-Dichlorobenzene	--	NA	ND(0.010)	NA	0.017	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,2-Dichloropropane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,3-Dichlorobenzene	--	NA	ND(0.010)	NA	0.0020 J	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
1,4-Dichlorobenzene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
2-Butanone	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
2-Hexanone	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
4-Methyl-2-pentanone	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Acetone	--	NA	ND(0.030)	NA	0.012 J	NA	ND(0.028)	NA	ND(0.030)	NA	ND(0.031)	NA
Benzene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Bromodichloromethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Bromoform	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Bromomethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Carbon Disulfide	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Carbon Tetrachloride	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Chlorobenzene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Chloroethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Chloroform	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Chloromethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
cis-1,2-Dichloroethene	--	NA	ND(0.010)	NA	0.0020 J	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
cis-1,3-Dichloropropene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Cyclohexane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Dibromochloromethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Dichlorodifluoromethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Ethylbenzene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Isopropylbenzene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Methyl acetate	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Methyl tert butyl ether	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Methylcyclohexane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Methylene Chloride	--	NA	0.0080 J	NA	0.0090 J	NA	0.0060 BJ	NA	0.0070 J	NA	0.027 B	NA
Styrene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Tetrachloroethene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Toluene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
trans-1,2-Dichloroethene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
trans-1,3-Dichloropropene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-C11 0 - 1 01/08/04	MSSB-C11 8 - 10 01/08/04	MSSB-C13 0 - 1 01/08/04	MSSB-C13 6 - 8 01/08/04	MSSB-C15 0 - 1 01/06/04	MSSB-C15 10 - 12 01/06/04	MSSB-C17 0 - 1 01/07/04	MSSB-C17 9 - 11 01/07/04	MSSB-C19 0 - 1 01/07/04	MSSB-C19 9 - 11 01/07/04	MSSB-D17 0 - 1 12/17/03
Trichloroethene	--	NA	ND(0.010)	NA	0.21 E	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Trichlorofluoromethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Vinyl acetate	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Vinyl chloride	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Xylenes,Total	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.0090)	NA	ND(0.010)	NA	ND(0.010)	NA
Semivolatile Organics												
2,2'-Oxybis(1-Chloropropane)	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
2,4,5-Trichlorophenol	--	NA	ND(0.93)	NA	ND(0.91)	NA	ND(0.93)	NA	ND(0.93)	NA	ND(0.87)	NA
2,4,6-Trichlorophenol	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
2,4-Dichlorophenol	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
2,4-Dimethylphenol	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
2,4-Dinitrophenol	--	NA	ND(1.6)	NA	ND(1.6)	NA	ND(1.6)	NA	ND(1.6)	NA	ND(1.5)	NA
2,4-Dinitrotoluene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
2,6-Dinitrotoluene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
2-Chloronaphthalene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
2-Chlorophenol	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
2-Methylnaphthalene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
2-Methylphenol	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
2-Nitroaniline	--	NA	ND(0.93)	NA	ND(0.91)	NA	ND(0.93)	NA	ND(0.93)	NA	ND(0.87)	NA
2-Nitrophenol	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
3,3'-Dichlorobenzidine	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
3-Nitroaniline	--	NA	ND(0.93)	NA	ND(0.91)	NA	ND(0.93)	NA	ND(0.93)	NA	ND(0.87)	NA
4,6-Dinitro-2-methylphenol	--	NA	ND(0.93)	NA	ND(0.91)	NA	ND(0.93)	NA	ND(0.93)	NA	ND(0.87)	NA
4-Bromophenyl phenyl ether	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
4-Chloro-3-methylphenol	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
4-Chloroaniline	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
4-Chlorophenyl phenyl ether	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
4-Methylphenol	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
4-Nitroaniline	--	NA	ND(0.93)	NA	ND(0.91)	NA	ND(0.93)	NA	ND(0.93)	NA	ND(0.87)	NA
4-Nitrophenol	--	NA	ND(0.93)	NA	ND(0.91)	NA	ND(0.93)	NA	ND(0.93)	NA	ND(0.87)	NA
Acenaphthene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Acenaphthylene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Acetophenone	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Anthracene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Atrazine	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Benzaldehyde	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Benzo(a)anthracene	2.1	ND(3.8)	ND(0.37)	ND(3.6)	0.64	1.3 J	ND(0.37)	0.41	ND(0.37)	ND(0.36)	ND(0.34)	ND(3.5)
Benzo(a)pyrene	0.2	ND(3.8)	ND(0.37)	1.3 J	0.48	1.3 J	ND(0.37)	0.30 J	ND(0.37)	ND(0.36)	ND(0.34)	ND(3.5)
Benzo(b)fluoranthene	2	ND(3.8)	ND(0.37)	ND(3.6)	0.40	1.7	ND(0.37)	0.47	ND(0.37)	ND(0.36)	ND(0.34)	ND(3.5)
Benzo(g,h,i)perylene	--	NA	ND(0.37)	NA	0.30 J	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Benzo(k)fluoranthene	--	NA	ND(0.37)	NA	0.50	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Biphenyl	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Bis(2-chloroethoxy) methane	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Bis(2-chloroethyl) ether	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
bis(2-Ethylhexyl)phthalate	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-C11 0 - 1 01/08/04	MSSB-C11 8 - 10 01/08/04	MSSB-C13 0 - 1 01/08/04	MSSB-C13 6 - 8 01/08/04	MSSB-C15 0 - 1 01/06/04	MSSB-C15 10 - 12 01/06/04	MSSB-C17 0 - 1 01/07/04	MSSB-C17 9 - 11 01/07/04	MSSB-C19 0 - 1 01/07/04	MSSB-C19 9 - 11 01/07/04	MSSB-D17 0 - 1 12/17/03
Butyl benzyl phthalate	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Caprolactam	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Carbazole	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Chrysene	--	NA	ND(0.37)	NA	0.59	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Di-n-Butylphthalate	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Di-n-Octylphthalate	--	NA	ND(0.50)	NA	ND(0.49)	NA	ND(0.50)	NA	ND(0.50)	NA	ND(0.47)	NA
Dibenz(a,h)anthracene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Dibenzofuran	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Diethyl phthalate	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Dimethyl phthalate	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Fluoranthene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Fluorene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Hexachlorobenzene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Hexachlorobutadiene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Hexachlorocyclopentadiene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Hexachloroethane	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Indeno(1,2,3-c,d)pyrene	--	NA	ND(0.37)	NA	0.31 J	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Isophorone	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
N-Nitroso-Di-n-propylamine	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
N-Nitrosodiphenylamine (1)	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Naphthalene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Nitrobenzene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Pentachlorophenol	--	NA	ND(0.93)	NA	ND(0.91)	NA	ND(0.93)	NA	ND(0.93)	NA	ND(0.87)	NA
Phenanthrene	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Phenol	--	NA	ND(0.37)	NA	ND(0.36)	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Pyrene	--	NA	ND(0.37)	NA	1.2	NA	ND(0.37)	NA	ND(0.37)	NA	ND(0.34)	NA
Inorganics												
Arsenic	11	ND(9.40)	NA	ND(9.10)	NA	7.30	NA	16.4	NA	10.3	NA	ND(8.70)
Miscellaneous Parameters												
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-D17 6 - 8 12/17/03	MSSB-E01 0 - 1 12/19/03	MSSB-E01 3 - 5 12/19/03	MSSB-E03 0 - 1 12/23/03	MSSB-E03 6 - 8 01/05/04	MSSB-E05 0 - 1 12/04/03	MSSB-E05 6 - 8 12/11/03	MSSB-E07 0 - 1 12/09/03	MSSB-E07 5 - 7 12/09/03	MSSB-E09 0 - 1 12/09/03	MSSB-E09 5 - 7 12/11/03
Volatile Organics												
1,1,1-Trichloroethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,1,2,2-Tetrachloroethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,1,2-Trichloro-1,2,2-trifluoroethat	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,1,2-Trichloroethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,1-Dichloroethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,1-Dichloroethene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,2 Dichloroethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,2,4 Trichlorobenzene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,2-Dibromo-3-chloropropane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,2-Dibromoethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,2-Dichlorobenzene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,2-Dichloropropane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,3-Dichlorobenzene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
1,4-Dichlorobenzene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
2-Butanone	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
2-Hexanone	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
4-Methyl-2-pentanone	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Acetone	--	ND(0.029)	NA	ND(0.036)	NA	ND(0.031)	NA	ND(0.032)	NA	ND(0.030)	NA	ND(0.032)
Benzene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Bromodichloromethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Bromoform	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Bromomethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Carbon Disulfide	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Carbon Tetrachloride	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Chlorobenzene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Chloroethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Chloroform	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Chloromethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
cis-1,2-Dichloroethene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
cis-1,3-Dichloropropene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Cyclohexane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Dibromochloromethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Dichlorodifluoromethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Ethylbenzene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Isopropylbenzene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Methyl acetate	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Methyl tert butyl ether	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Methylcyclohexane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Methylene Chloride	--	ND(0.010)	NA	0.014	NA	0.013 B	NA	ND(0.011)	NA	0.0050 J	NA	0.0060 J
Styrene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Tetrachloroethene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Toluene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
trans-1,2-Dichloroethene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
trans-1,3-Dichloropropene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

DRAFT
FOR EPA REVIEW

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	MSSB-D17 6 - 8 12/17/03	MSSB-E01 0 - 1 12/19/03	MSSB-E01 3 - 5 12/19/03	MSSB-E03 0 - 1 12/23/03	MSSB-E03 6 - 8 01/05/04	MSSB-E05 0 - 1 12/04/03	MSSB-E05 6 - 8 12/11/03	MSSB-E07 0 - 1 12/09/03	MSSB-E07 5 - 7 12/09/03	MSSB-E09 0 - 1 12/09/03	MSSB-E09 5 - 7 12/11/03
Trichloroethene	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Trichlorofluoromethane	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Vinyl acetate	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Vinyl chloride	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Xylenes,Total	--	ND(0.010)	NA	ND(0.012)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.010)	NA	ND(0.010)
Semivolatile Organics												
2,2'-Oxybis(1-Chloropropane)	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
2,4,5-Trichlorophenol	--	ND(0.89)	NA	ND(1.0)	NA	ND(0.90)	NA	ND(0.96)	NA	ND(0.88)	NA	ND(0.91)
2,4,6-Trichlorophenol	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
2,4-Dichlorophenol	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
2,4-Dimethylphenol	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
2,4-Dinitrophenol	--	ND(1.6)	NA	ND(1.9)	NA	ND(1.6)	NA	ND(1.7)	NA	ND(1.5)	NA	ND(1.6)
2,4-Dinitrotoluene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
2,6-Dinitrotoluene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
2-Chloronaphthalene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
2-Chlorophenol	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
2-Methylnaphthalene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
2-Methylphenol	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
2-Nitroaniline	--	ND(0.89)	NA	ND(1.0)	NA	ND(0.90)	NA	ND(0.96)	NA	ND(0.88)	NA	ND(0.91)
2-Nitrophenol	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
3,3'-Dichlorobenzidine	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
3-Nitroaniline	--	ND(0.89)	NA	ND(1.0)	NA	ND(0.90)	NA	ND(0.96)	NA	ND(0.88)	NA	ND(0.91)
4,6-Dinitro-2-methylphenol	--	ND(0.89)	NA	ND(1.0)	NA	ND(0.90)	NA	ND(0.96)	NA	ND(0.88)	NA	ND(0.91)
4-Bromophenyl phenyl ether	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
4-Chloro-3-methylphenol	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
4-Chloroaniline	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
4-Chlorophenyl phenyl ether	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
4-Methylphenol	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
4-Nitroaniline	--	ND(0.89)	NA	ND(1.0)	NA	ND(0.90)	NA	ND(0.96)	NA	ND(0.88)	NA	ND(0.91)
4-Nitrophenol	--	ND(0.89)	NA	ND(1.0)	NA	ND(0.90)	NA	ND(0.96)	NA	ND(0.88)	NA	ND(0.91)
Acenaphthene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Acenaphthylene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Acetophenone	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Anthracene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Atrazine	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Benzaldehyde	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Benzo(a)anthracene	2.1	ND(0.35)	ND(3.9)	ND(0.42)	ND(3.9)	ND(0.36)	ND(0.35)	ND(0.38)	0.36 J	ND(0.35)	ND(0.38)	ND(0.36)
Benzo(a)pyrene	0.2	ND(0.35)	ND(3.9)	ND(0.42)	ND(3.9)	ND(0.36)	ND(0.35)	ND(0.38)	0.15 J	ND(0.35)	ND(0.38)	ND(0.36)
Benzo(b)fluoranthene	2	ND(0.35)	ND(3.9)	ND(0.42)	ND(3.9)	ND(0.36)	ND(0.35)	ND(0.38)	0.87	ND(0.35)	ND(0.38)	ND(0.36)
Benzo(g,h,i)perylene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Benzo(k)fluoranthene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Biphenyl	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Bis(2-chloroethoxy) methane	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Bis(2-chloroethyl) ether	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
bis(2-Ethylhexyl)phthalate	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	MSSB-D17 6 - 8 12/17/03	MSSB-E01 0 - 1 12/19/03	MSSB-E01 3 - 5 12/19/03	MSSB-E03 0 - 1 12/23/03	MSSB-E03 6 - 8 01/05/04	MSSB-E05 0 - 1 12/04/03	MSSB-E05 6 - 8 12/11/03	MSSB-E07 0 - 1 12/09/03	MSSB-E07 5 - 7 12/09/03	MSSB-E09 0 - 1 12/09/03	MSSB-E09 5 - 7 12/11/03
Butyl benzyl phthalate	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Caprolactam	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Carbazole	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Chrysene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Di-n-Butylphthalate	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Di-n-Octylphthalate	--	ND(0.48)	NA	ND(0.57)	NA	ND(0.48)	NA	ND(0.52)	NA	ND(0.47)	NA	ND(0.49)
Dibenz(a,h)anthracene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Dibenzofuran	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Diethyl phthalate	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Dimethyl phthalate	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Fluoranthene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Fluorene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Hexachlorobenzene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Hexachlorobutadiene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Hexachlorocyclopentadiene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Hexachloroethane	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Indeno(1,2,3-c,d)pyrene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Isophorone	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
N-Nitroso-Di-n-propylamine	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
N-Nitrosodiphenylamine (1)	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Naphthalene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Nitrobenzene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Pentachlorophenol	--	ND(0.89)	NA	ND(1.0)	NA	ND(0.90)	NA	ND(0.96)	NA	ND(0.88)	NA	ND(0.91)
Phenanthrene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Phenol	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Pyrene	--	ND(0.35)	NA	ND(0.42)	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.36)
Inorganics												
Arsenic	11	NA	ND(9.30)	NA	ND(9.70 N)	NA	ND(9.00)	NA	ND(9.60)	NA	ND(9.20)	NA
Miscellaneous Parameters												
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

DRAFT
FOR EPA REVIEW

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-E11 0 - 1 12/18/03	MSSB-E11 7 - 9 12/18/03	MSSB-E13 0 - 1 12/17/03	MSSB-E13 6 - 8 12/18/03	MSSB-E15 0 - 1 12/17/03	MSSB-E15 5 - 7 12/17/03	MSSB-F07 0 - 1 12/12/03	MSSB-F07 5 - 7 12/12/03	MSSB-G01 0 - 1 12/11/03	MSSB-G01 5 - 7 12/11/03	MSSB-G03 0 - 1 12/16/03
Volatile Organics												
1,1,1-Trichloroethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,1,2,2-Tetrachloroethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,1,2-Trichloro-1,2,2-trifluoroetha	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,1,2-Trichloroethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,1-Dichloroethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,1-Dichloroethene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,2 Dichloroethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,2,4 Trichlorobenzene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,2-Dibromo-3-chloropropane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,2-Dibromoethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,2-Dichlorobenzene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,2-Dichloropropane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,3-Dichlorobenzene	--	NA	ND(0.010)	NA	0.011	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
1,4-Dichlorobenzene	--	NA	ND(0.010)	NA	0.042	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
2-Butanone	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
2-Hexanone	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
4-Methyl-2-pentanone	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Acetone	--	NA	ND(0.029)	NA	0.015 J	NA	ND(0.032)	NA	ND(0.059)	NA	ND(0.032)	NA
Benzene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Bromodichloromethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Bromoform	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Bromomethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Carbon Disulfide	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Carbon Tetrachloride	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Chlorobenzene	--	NA	ND(0.010)	NA	0.040	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Chloroethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Chloroform	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Chloromethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
cis-1,2-Dichloroethene	--	NA	ND(0.010)	NA	0.020	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
cis-1,3-Dichloropropene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Cyclohexane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Dibromochloromethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Dichlorodifluoromethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Ethylbenzene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Isopropylbenzene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Methyl acetate	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Methyl tert butyl ether	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Methylcyclohexane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Methylene Chloride	--	NA	0.0070 J	NA	0.0060 J	NA	ND(0.011)	NA	0.013 J	NA	ND(0.011)	NA
Styrene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Tetrachloroethene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Toluene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
trans-1,2-Dichloroethene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
trans-1,3-Dichloropropene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-E11 0 - 1 12/18/03	MSSB-E11 7 - 9 12/18/03	MSSB-E13 0 - 1 12/17/03	MSSB-E13 6 - 8 12/18/03	MSSB-E15 0 - 1 12/17/03	MSSB-E15 5 - 7 12/17/03	MSSB-F07 0 - 1 12/12/03	MSSB-F07 5 - 7 12/12/03	MSSB-G01 0 - 1 12/11/03	MSSB-G01 5 - 7 12/11/03	MSSB-G03 0 - 1 12/16/03
Trichloroethene	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Trichlorofluoromethane	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Vinyl acetate	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Vinyl chloride	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Xylenes,Total	--	NA	ND(0.010)	NA	ND(0.010)	NA	ND(0.011)	NA	ND(0.020)	NA	ND(0.011)	NA
Semivolatile Organics												
2,2'-Oxybis(1-Chloropropane)	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
2,4,5-Trichlorophenol	--	NA	ND(0.91)	NA	ND(0.94)	NA	ND(0.88)	NA	ND(0.86)	NA	ND(10)	NA
2,4,6-Trichlorophenol	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
2,4-Dichlorophenol	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
2,4-Dimethylphenol	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
2,4-Dinitrophenol	--	NA	ND(1.6)	NA	ND(1.7)	NA	ND(1.5)	NA	ND(1.5)	NA	ND(18)	NA
2,4-Dinitrotoluene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	0.46	NA	ND(4.1)	NA
2,6-Dinitrotoluene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
2-Chloronaphthalene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
2-Chlorophenol	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
2-Methylnaphthalene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
2-Methylphenol	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
2-Nitroaniline	--	NA	ND(0.91)	NA	ND(0.94)	NA	ND(0.88)	NA	ND(0.86)	NA	ND(10)	NA
2-Nitrophenol	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
3,3'-Dichlorobenzidine	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
3-Nitroaniline	--	NA	ND(0.91)	NA	ND(0.94)	NA	ND(0.88)	NA	ND(0.86)	NA	ND(10)	NA
4,6-Dinitro-2-methylphenol	--	NA	ND(0.91)	NA	ND(0.94)	NA	ND(0.88)	NA	ND(0.86)	NA	ND(10)	NA
4-Bromophenyl phenyl ether	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
4-Chloro-3-methylphenol	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
4-Chloroaniline	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
4-Chlorophenyl phenyl ether	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
4-Methylphenol	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
4-Nitroaniline	--	NA	ND(0.91)	NA	ND(0.94)	NA	ND(0.88)	NA	ND(0.86)	NA	ND(10)	NA
4-Nitrophenol	--	NA	ND(0.91)	NA	ND(0.94)	NA	ND(0.88)	NA	ND(0.86)	NA	ND(10)	NA
Acenaphthene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Acenaphthylene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Acetophenone	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Anthracene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Atrazine	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Benzaldehyde	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Benzo(a)anthracene	2.1	ND(1.8)	ND(0.36)	ND(1.8)	ND(0.38)	ND(6.8)	ND(0.35)	ND(1.9)	ND(0.34)	ND(1.8)	ND(4.1)	ND(7.1) [21 J]
Benzo(a)pyrene	0.2	ND(1.8)	ND(0.36)	ND(1.8)	ND(0.38)	21	ND(0.35)	0.80 J	ND(0.34)	ND(1.8)	ND(4.1)	ND(7.1) [23 J]
Benzo(b)fluoranthene	2	ND(1.8)	ND(0.36)	ND(1.8)	ND(0.38)	25	ND(0.35)	1.0 J	ND(0.34)	ND(1.8)	ND(4.1)	ND(7.1) [24 J]
Benzo(g,h,i)perylene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Benzo(k)fluoranthene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Biphenyl	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Bis(2-chloroethoxy) methane	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Bis(2-chloroethyl) ether	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
bis(2-Ethylhexyl)phthalate	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

DRAFT
FOR EPA REVIEW

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-E11 0 - 1 12/18/03	MSSB-E11 7 - 9 12/18/03	MSSB-E13 0 - 1 12/17/03	MSSB-E13 6 - 8 12/18/03	MSSB-E15 0 - 1 12/17/03	MSSB-E15 5 - 7 12/17/03	MSSB-F07 0 - 1 12/12/03	MSSB-F07 5 - 7 12/12/03	MSSB-G01 0 - 1 12/11/03	MSSB-G01 5 - 7 12/11/03	MSSB-G03 0 - 1 12/16/03
Butyl benzyl phthalate	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Caprolactam	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Carbazole	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Chrysene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Di-n-Butylphthalate	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Di-n-Octylphthalate	--	NA	ND(0.49)	NA	ND(0.51)	NA	ND(0.47)	NA	ND(0.46)	NA	ND(5.5)	NA
Dibenz(a,h)anthracene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Dibenzofuran	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Diethyl phthalate	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Dimethyl phthalate	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Fluoranthene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Fluorene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Hexachlorobenzene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Hexachlorobutadiene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Hexachlorocyclopentadiene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Hexachloroethane	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Indeno(1,2,3-c,d)pyrene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Isophorone	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
N-Nitroso-Di-n-propylamine	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
N-Nitrosodiphenylamine (1)	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Naphthalene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Nitrobenzene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Pentachlorophenol	--	NA	ND(0.91)	NA	ND(0.94)	NA	ND(0.88)	NA	ND(0.86)	NA	ND(10)	NA
Phenanthrene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Phenol	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Pyrene	--	NA	ND(0.36)	NA	ND(0.38)	NA	ND(0.35)	NA	ND(0.34)	NA	ND(4.1)	NA
Inorganics												
Arsenic	11	ND(7.60)	NA	8.90	NA	9.50	NA	10.4	NA	36.9	NA	13.0 [11.9 N]
Miscellaneous Parameters												
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-G03 3 - 5 12/16/03	MSSB-G03 3 - 5 01/05/04	MSSB-G05 0 - 1 12/16/03	MSSB-G05 6 - 8 12/16/03	MSSB-G05 6 - 8 01/05/04	MSSS-C02 0 - 1 01/12/04	MSSS-C04 0 - 1 01/14/04	MSSS-C06 0 - 1 01/14/04	MSSS-C08 0 - 1 01/12/04	MSSS-C10 0 - 1 01/12/04
Volatile Organics											
1,1,1-Trichloroethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,1,2,2-Tetrachloroethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,1,2-Trichloro-1,2,2-trifluoroetha	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,1,2-Trichloroethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,1-Dichloroethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,1-Dichloroethene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,2 Dichloroethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,2,4 Trichlorobenzene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,2-Dibromo-3-chloropropane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,2-Dibromoethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,2-Dichloropropane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
2-Butanone	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
2-Hexanone	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
4-Methyl-2-pentanone	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Acetone	--	NA	ND(0.032)	NA	NA	ND(0.029)	NA	NA	NA	NA	NA
Benzene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Bromodichloromethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Bromoform	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Bromomethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Carbon Disulfide	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Carbon Tetrachloride	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Chlorobenzene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Chloroethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Chloroform	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Chloromethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
cis-1,2-Dichloroethene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
cis-1,3-Dichloropropene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Cyclohexane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Dibromochloromethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Dichlorodifluoromethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Ethylbenzene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Isopropylbenzene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Methyl acetate	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Methyl tert butyl ether	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Methylcyclohexane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Methylene Chloride	--	NA	0.010 BJ	NA	NA	0.0080 BJ	NA	NA	NA	NA	NA
Styrene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Tetrachloroethene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Toluene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
trans-1,2-Dichloroethene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
trans-1,3-Dichloropropene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

DRAFT
FOR EPA REVIEW

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-G03 3 - 5 12/16/03	MSSB-G03 3 - 5 01/05/04	MSSB-G05 0 - 1 12/16/03	MSSB-G05 6 - 8 12/16/03	MSSB-G05 6 - 8 01/05/04	MSSS-C02 0 - 1 01/12/04	MSSS-C04 0 - 1 01/14/04	MSSS-C06 0 - 1 01/14/04	MSSS-C08 0 - 1 01/12/04	MSSS-C10 0 - 1 01/12/04
Trichloroethene	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Trichlorofluoromethane	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Vinyl acetate	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Vinyl chloride	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Xylenes,Total	--	NA	ND(0.011)	NA	NA	ND(0.010)	NA	NA	NA	NA	NA
Semivolatile Organics											
2,2'-Oxybis(1-Chloropropane)	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
2,4,5-Trichlorophenol	--	ND(0.90)	ND(0.90)	NA	ND(0.90)	ND(0.86)	NA	NA	NA	NA	NA
2,4,6-Trichlorophenol	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
2,4-Dichlorophenol	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
2,4-Dimethylphenol	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
2,4-Dinitrophenol	--	ND(1.6)	ND(1.6)	NA	ND(1.6)	ND(1.5)	NA	NA	NA	NA	NA
2,4-Dinitrotoluene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
2,6-Dinitrotoluene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
2-Chloronaphthalene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
2-Chlorophenol	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
2-Methylnaphthalene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
2-Methylphenol	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
2-Nitroaniline	--	ND(0.90)	ND(0.90)	NA	ND(0.90)	ND(0.86)	NA	NA	NA	NA	NA
2-Nitrophenol	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
3,3'-Dichlorobenzidine	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
3-Nitroaniline	--	ND(0.90)	ND(0.90)	NA	ND(0.90)	ND(0.86)	NA	NA	NA	NA	NA
4,6-Dinitro-2-methylphenol	--	ND(0.90)	ND(0.90)	NA	ND(0.90)	ND(0.86)	NA	NA	NA	NA	NA
4-Bromophenyl phenyl ether	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
4-Chloro-3-methylphenol	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
4-Chloroaniline	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
4-Chlorophenyl phenyl ether	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
4-Methylphenol	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
4-Nitroaniline	--	ND(0.90)	ND(0.90)	NA	ND(0.90)	ND(0.86)	NA	NA	NA	NA	NA
4-Nitrophenol	--	ND(0.90)	ND(0.90)	NA	ND(0.90)	ND(0.86)	NA	NA	NA	NA	NA
Acenaphthene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Acenaphthylene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Acetophenone	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Anthracene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Atrazine	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Benzaldehyde	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Benzo(a)anthracene	2.1	ND(0.36)	ND(0.36)	34 J	ND(0.36)	ND(0.34)	8.6	1.0 J	2.4 [3.3]	ND(3.7)	ND(3.7)
Benzo(a)pyrene	0.2	ND(0.36)	ND(0.36)	34 J	ND(0.36)	ND(0.34)	6.0	0.88 J	2.1 [2.9]	ND(3.7)	ND(3.7)
Benzo(b)fluoranthene	2	ND(0.36)	ND(0.36)	32 J	ND(0.36)	ND(0.34)	10	1.0 J	3.1 [4.1]	ND(3.7)	ND(3.7)
Benzo(g,h,i)perylene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Benzo(k)fluoranthene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Biphenyl	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Bis(2-chloroethoxy) methane	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Bis(2-chloroethyl) ether	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
bis(2-Ethylhexyl)phthalate	--	ND(0.36)	0.16 J	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSB-G03 3 - 5 12/16/03	MSSB-G03 3 - 5 01/05/04	MSSB-G05 0 - 1 12/16/03	MSSB-G05 6 - 8 12/16/03	MSSB-G05 6 - 8 01/05/04	MSSS-C02 0 - 1 01/12/04	MSSS-C04 0 - 1 01/14/04	MSSS-C06 0 - 1 01/14/04	MSSS-C08 0 - 1 01/12/04	MSSS-C10 0 - 1 01/12/04
Butyl benzyl phthalate	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Caprolactam	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Carbazole	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Chrysene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Di-n-Butylphthalate	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Di-n-Octylphthalate	--	ND(0.48)	ND(0.48)	NA	ND(0.48)	ND(0.46)	NA	NA	NA	NA	NA
Dibenz(a,h)anthracene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Dibenzofuran	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Diethyl phthalate	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Dimethyl phthalate	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Fluoranthene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Fluorene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Hexachlorobenzene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Hexachlorobutadiene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Hexachlorocyclopentadiene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Hexachloroethane	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Indeno(1,2,3-c,d)pyrene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	! . .	NA	NA	NA
Isophorone	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
N-Nitroso-Di-n-propylamine	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
N-Nitrosodiphenylamine (1)	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Naphthalene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Nitrobenzene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Pentachlorophenol	--	ND(0.90)	ND(0.90)	NA	ND(0.90)	ND(0.86)	NA	NA	NA	NA	NA
Phenanthrene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Phenol	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Pyrene	--	ND(0.36)	ND(0.36)	NA	ND(0.36)	ND(0.34)	NA	NA	NA	NA	NA
Inorganics											
Arsenic	11	NA	NA	ND(8.60 N)	NA	NA	28.4 N	12.9 N	17.1 N [18.7 N]	12.4 N	ND(9.00 N)
Miscellaneous Parameters											
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSS-C12 0 - 1 01/12/04	MSSS-C14 0 - 1 01/12/04	MSSS-C16 0 - 1 01/12/04	MSSS-C18 0 - 1 01/12/04	MSSS-C20 0 - 1 01/12/04	MSSS-D03 0 - 1 12/18/03	MSSS-D04 0 - 1 12/18/03	MSSS-D05 0 - 1 12/04/03	MSSS-D06 0 - 1 12/04/03	MSSS-D07 0 - 1 12/04/03	MSSS-D08 0 - 1 12/04/03
Volatile Organics												
1,1,1-Trichloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2,2-Tetrachloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-Trichloro-1,2,2-trifluoroethai	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-Trichloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-Dichloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-Dichloroethene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2 Dichloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4 Trichlorobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dibromo-3-chloropropane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dibromoethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichloropropane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Butanone	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Hexanone	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Methyl-2-pentanone	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Acetone	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bromodichloromethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bromoform	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bromomethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Carbon Disulfide	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Carbon Tetrachloride	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chloroform	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chloromethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
cis-1,2-Dichloroethene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
cis-1,3-Dichloropropene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dibromochloromethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dichlorodifluoromethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methyl acetate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methyl tert butyl ether	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylcyclohexane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Styrene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
trans-1,2-Dichloroethene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
trans-1,3-Dichloropropene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSS-C12 0 - 1 01/12/04	MSSS-C14 0 - 1 01/12/04	MSSS-C16 0 - 1 01/12/04	MSSS-C18 0 - 1 01/12/04	MSSS-C20 0 - 1 01/12/04	MSSS-D03 0 - 1 12/18/03	MSSS-D04 0 - 1 12/18/03	MSSS-D05 0 - 1 12/04/03	MSSS-D06 0 - 1 12/04/03	MSSS-D07 0 - 1 12/04/03	MSSS-D08 0 - 1 12/04/03
Trichloroethene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Trichlorofluoromethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Vinyl acetate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Vinyl chloride	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes,Total	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Semivolatile Organics												
2,2'-Oxybis(1-Chloropropane)	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-Trichlorophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-Trichlorophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-Dichlorophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-Dimethylphenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-Dinitrophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-Dinitrotoluene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,6-Dinitrotoluene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Chloronaphthalene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Chlorophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Methylnaphthalene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Methylphenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Nitroaniline	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Nitrophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3,3'-Dichlorobenzidine	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3-Nitroaniline	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-Dinitro-2-methylphenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Bromophenyl phenyl ether	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Chloro-3-methylphenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Chloroaniline	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Chlorophenyl phenyl ether	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Methylphenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Nitroaniline	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Nitrophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Acenaphthene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Acenaphthylene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Acetophenone	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Atrazine	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzaldehyde	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(a)anthracene	2.1	ND(3.7)	15	5.9	6.2 [ND(3.5)]	ND(1.8)	18	ND(3.8)	ND(0.35)	0.22 J	0.31 J	0.48
Benzo(a)pyrene	0.2	ND(3.7)	10	6.4	5.7 [1.3 J]	ND(1.8)	10	ND(3.8)	0.15 J	0.24 J	0.34 J	0.48
Benzo(b)fluoranthene	2	ND(3.7)	14	9.2	7.0 [2.1 J]	ND(1.8)	18	ND(3.8)	0.18 J	0.29 J	0.38	0.75
Benzo(g,h,i)perylene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(k)fluoranthene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Biphenyl	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bis(2-chloroethoxy) methane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bis(2-chloroethyl) ether	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
bis(2-Ethylhexyl)phthalate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	MSSS-C12 0 - 1 01/12/04	MSSS-C14 0 - 1 01/12/04	MSSS-C16 0 - 1 01/12/04	MSSS-C18 0 - 1 01/12/04	MSSS-C20 0 - 1 01/12/04	MSSS-D03 0 - 1 12/18/03	MSSS-D04 0 - 1 12/18/03	MSSS-D05 0 - 1 12/04/03	MSSS-D06 0 - 1 12/04/03	MSSS-D07 0 - 1 12/04/03	MSSS-D08 0 - 1 12/04/03
Butyl benzyl phthalate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Caprolactam	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Carbazole	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chrysene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Di-n-Butylphthalate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Di-n-Octylphthalate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dibenz(a,h)anthracene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dibenzofuran	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Diethyl phthalate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dimethyl phthalate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluorene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hexachlorobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hexachlorobutadiene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hexachlorocyclopentadiene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hexachloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Indeno(1,2,3-c,d)pyrene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isophorone	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-Nitroso-Di-n-propylamine	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-Nitrosodiphenylamine (1)	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nitrobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pentachlorophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Phenanthrene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Phenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pyrene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Inorganics												
Arsenic	11	11.8 N	12.9 N	32.8 N	47.2 [34.6 N]	10.0	12.5	ND(9.70)	ND(9.10)	ND(9.40)	ND(9.10)	9.80
Miscellaneous Parameters												
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSS-D09 0 - 1 12/04/03	MSSS-D10 0 - 1 12/04/03	MSSS-D11 0 - 1 12/04/03	MSSS-D13 0 - 1 12/04/03	MSSS-D14 0 - 1 12/04/03	MSSS-D15 0 - 1 12/04/03	MSSS-E02 0 - 1 12/23/03	MSSS-E12 0 - 1 12/18/03	MSSS-E14 0 - 1 12/18/03	MSSS-F01 0 - 1 12/08/03
Volatile Organics											
1,1,1-Trichloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2,2-Tetrachloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-Trichloro-1,2,2-trifluoroethar	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1,2-Trichloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-Dichloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,1-Dichloroethene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2 Dichloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2,4 Trichlorobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dibromo-3-chloropropane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dibromoethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,2-Dichloropropane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Butanone	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Hexanone	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Methyl-2-pentanone	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Acetone	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bromodichloromethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bromoform	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bromomethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Carbon Disulfide	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Carbon Tetrachloride	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chloroform	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chloromethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
cis-1,2-Dichloroethene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
cis-1,3-Dichloropropene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cyclohexane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dibromochloromethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dichlorodifluoromethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methyl acetate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methyl tert butyl ether	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylcyclohexane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Styrene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Toluene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
trans-1,2-Dichloroethene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
trans-1,3-Dichloropropene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter Date Collected:	Performance Standard	MSSS-D09 0 - 1 12/04/03	MSSS-D10 0 - 1 12/04/03	MSSS-D11 0 - 1 12/04/03	MSSS-D13 0 - 1 12/04/03	MSSS-D14 0 - 1 12/04/03	MSSS-D15 0 - 1 12/04/03	MSSS-E02 0 - 1 12/23/03	MSSS-E12 0 - 1 12/18/03	MSSS-E14 0 - 1 12/18/03	MSSS-F01 0 - 1 12/08/03
Trichloroethene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Trichlorofluoromethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Vinyl acetate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Vinyl chloride	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Xylenes,Total	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Semivolatile Organics											
2,2'-Oxybis(1-Chloropropane)	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,5-Trichlorophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4,6-Trichlorophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-Dichlorophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-Dimethylphenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-Dinitrophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,4-Dinitrotoluene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2,6-Dinitrotoluene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Chloronaphthalene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Chlorophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Methylnaphthalene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Methylphenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Nitroaniline	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2-Nitrophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3,3'-Dichlorobenzidine	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
3-Nitroaniline	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4,6-Dinitro-2-methylphenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Bromophenyl phenyl ether	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Chloro-3-methylphenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Chloroaniline	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Chlorophenyl phenyl ether	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Methylphenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Nitroaniline	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
4-Nitrophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Acenaphthene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Acenaphthylene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Acetophenone	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Atrazine	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzaldehyde	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(a)anthracene	2.1	ND(0.36)	ND(0.38)	ND(0.36)	ND(0.35) [ND(0.36)]	0.46	5.5	ND(3.9)	ND(1.8)	ND(3.6)	0.48
Benzo(a)pyrene	0.2	ND(0.36)	ND(0.38)	ND(0.36)	0.14 J [0.16 J]	0.42	5.8	ND(3.9)	ND(1.8)	ND(3.6)	0.47
Benzo(b)fluoranthene	2	ND(0.36)	ND(0.38)	ND(0.36)	ND(0.35) [0.16 J]	0.44	7.1 D	ND(3.9)	ND(1.8)	ND(3.6)	0.76
Benzo(g,h,i)perylene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(k)fluoranthene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Biphenyl	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bis(2-chloroethoxy) methane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Bis(2-chloroethyl) ether	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
bis(2-Ethylhexyl)phthalate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSS-D09 0 - 1 12/04/03	MSSS-D10 0 - 1 12/04/03	MSSS-D11 0 - 1 12/04/03	MSSS-D13 0 - 1 12/04/03	MSSS-D14 0 - 1 12/04/03	MSSS-D15 0 - 1 12/04/03	MSSS-E02 0 - 1 12/23/03	MSSS-E12 0 - 1 12/18/03	MSSS-E14 0 - 1 12/18/03	MSSS-F01 0 - 1 12/08/03
Butyl benzyl phthalate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Caprolactam	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Carbazole	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chrysene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Di-n-Butylphthalate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Di-n-Octylphthalate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dibenz(a,h)anthracene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dibenzofuran	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Diethyl phthalate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dimethyl phthalate	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluorene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hexachlorobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hexachlorobutadiene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hexachlorocyclopentadiene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Hexachloroethane	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Indeno(1,2,3-c,d)pyrene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Isophorone	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-Nitroso-Di-n-propylamine	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
N-Nitrosodiphenylamine (1)	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Nitrobenzene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pentachlorophenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Phenanthrene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Phenol	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Pyrene	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Inorganics											
Arsenic	11	ND(9.00)	ND(9.50)	ND(8.90)	10.0 [ND(9.10)]	ND(9.00)	15.6	ND(9.60)	9.10	17.5	21.9
Miscellaneous Parameters											
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	MSSS-F02 0 - 1 12/08/03	MSSS-F03 0 - 1 12/08/03	MSSS-F04 0 - 1 12/08/03	MSSS-F06 0 - 1 12/08/03	MSSS-F08 0 - 1 12/18/03	MSSS-F09 0 - 1 12/18/03	MSSS-F10 0 - 1 12/18/03
Volatile Organics								
1,1,1-Trichloroethane	--	NA	NA	NA	NA	NA	NA	NA
1,1,2,2-Tetrachloroethane	--	NA	NA	NA	NA	NA	NA	NA
1,1,2-Trichloro-1,2,2-trifluoroethar	--	NA	NA	NA	NA	NA	NA	NA
1,1,2-Trichloroethane	--	NA	NA	NA	NA	NA	NA	NA
1,1-Dichloroethane	--	NA	NA	NA	NA	NA	NA	NA
1,1-Dichloroethene	--	NA	NA	NA	NA	NA	NA	NA
1,2 Dichloroethane	--	NA	NA	NA	NA	NA	NA	NA
1,2,4 Trichlorobenzene	--	NA	NA	NA	NA	NA	NA	NA
1,2-Dibromo-3-chloropropane	--	NA	NA	NA	NA	NA	NA	NA
1,2-Dibromoethane	--	NA	NA	NA	NA	NA	NA	NA
1,2-Dichlorobenzene	--	NA	NA	NA	NA	NA	NA	NA
1,2-Dichloropropane	--	NA	NA	NA	NA	NA	NA	NA
1,3-Dichlorobenzene	--	NA	NA	NA	NA	NA	NA	NA
1,4-Dichlorobenzene	--	NA	NA	NA	NA	NA	NA	NA
2-Butanone	--	NA	NA	NA	NA	NA	NA	NA
2-Hexanone	--	NA	NA	NA	NA	NA	NA	NA
4-Methyl-2-pentanone	--	NA	NA	NA	NA	NA	NA	NA
Acetone	--	NA	NA	NA	NA	NA	NA	NA
Benzene	--	NA	NA	NA	NA	NA	NA	NA
Bromodichloromethane	--	NA	NA	NA	NA	NA	NA	NA
Bromoform	--	NA	NA	NA	NA	NA	NA	NA
Bromomethane	--	NA	NA	NA	NA	NA	NA	NA
Carbon Disulfide	--	NA	NA	NA	NA	NA	NA	NA
Carbon Tetrachloride	--	NA	NA	NA	NA	NA	NA	NA
Chlorobenzene	--	NA	NA	NA	NA	NA	NA	NA
Chloroethane	--	NA	NA	NA	NA	NA	NA	NA
Chloroform	--	NA	NA	NA	NA	NA	NA	NA
Chloromethane	--	NA	NA	NA	NA	NA	NA	NA
cis-1,2-Dichloroethene	--	NA	NA	NA	NA	NA	NA	NA
cis-1,3-Dichloropropene	--	NA	NA	NA	NA	NA	NA	NA
Cyclohexane	--	NA	NA	NA	NA	NA	NA	NA
Dibromochloromethane	--	NA	NA	NA	NA	NA	NA	NA
Dichlorodifluoromethane	--	NA	NA	NA	NA	NA	NA	NA
Ethylbenzene	--	NA	NA	NA	NA	NA	NA	NA
Isopropylbenzene	--	NA	NA	NA	NA	NA	NA	NA
Methyl acetate	--	NA	NA	NA	NA	NA	NA	NA
Methyl tert butyl ether	--	NA	NA	NA	NA	NA	NA	NA
Methylcyclohexane	--	NA	NA	NA	NA	NA	NA	NA
Methylene Chloride	--	NA	NA	NA	NA	NA	NA	NA
Styrene	--	NA	NA	NA	NA	NA	NA	NA
Tetrachloroethene	--	NA	NA	NA	NA	NA	NA	NA
Toluene	--	NA	NA	NA	NA	NA	NA	NA
trans-1,2-Dichloroethene	--	NA	NA	NA	NA	NA	NA	NA
trans-1,3-Dichloropropene	--	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: / Sample Depth(Feet): / Parameter / Date Collected:	Performance Standard	MSSS-F02 0 - 1 12/08/03	MSSS-F03 0 - 1 12/08/03	MSSS-F04 0 - 1 12/08/03	MSSS-F06 0 - 1 12/08/03	MSSS-F08 0 - 1 12/18/03	MSSS-F09 0 - 1 12/18/03	MSSS-F10 0 - 1 12/18/03
Trichloroethene	--	NA	NA	NA	NA	NA	NA	NA
Trichlorofluoromethane	--	NA	NA	NA	NA	NA	NA	NA
Vinyl acetate	--	NA	NA	NA	NA	NA	NA	NA
Vinyl chloride	--	NA	NA	NA	NA	NA	NA	NA
Xylenes,Total	--	NA	NA	NA	NA	NA	NA	NA
Semivolatile Organics								
2,2'-Oxybis(1-Chloropropane)	--	NA	NA	NA	NA	NA	NA	NA
2,4,5-Trichlorophenol	--	NA	NA	NA	NA	NA	NA	NA
2,4,6-Trichlorophenol	--	NA	NA	NA	NA	NA	NA	NA
2,4-Dichlorophenol	--	NA	NA	NA	NA	NA	NA	NA
2,4-Dimethylphenol	--	NA	NA	NA	NA	NA	NA	NA
2,4-Dinitrophenol	--	NA	NA	NA	NA	NA	NA	NA
2,4-Dinitrotoluene	--	NA	NA	NA	NA	NA	NA	NA
2,6-Dinitrotoluene	--	NA	NA	NA	NA	NA	NA	NA
2-Chloronaphthalene	--	NA	NA	NA	NA	NA	NA	NA
2-Chlorophenol	--	NA	NA	NA	NA	NA	NA	NA
2-Methylnaphthalene	--	NA	NA	NA	NA	NA	NA	NA
2-Methylphenol	--	NA	NA	NA	NA	NA	NA	NA
2-Nitroaniline	--	NA	NA	NA	NA	NA	NA	NA
2-Nitrophenol	--	NA	NA	NA	NA	NA	NA	NA
3,3'-Dichlorobenzidine	--	NA	NA	NA	NA	NA	NA	NA
3-Nitroaniline	--	NA	NA	NA	NA	NA	NA	NA
4,6-Dinitro-2-methylphenol	--	NA	NA	NA	NA	NA	NA	NA
4-Bromophenyl phenyl ether	--	NA	NA	NA	NA	NA	NA	NA
4-Chloro-3-methylphenol	--	NA	NA	NA	NA	NA	NA	NA
4-Chloroaniline	--	NA	NA	NA	NA	NA	NA	NA
4-Chlorophenyl phenyl ether	--	NA	NA	NA	NA	NA	NA	NA
4-Methylphenol	--	NA	NA	NA	NA	NA	NA	NA
4-Nitroaniline	--	NA	NA	NA	NA	NA	NA	NA
4-Nitrophenol	--	NA	NA	NA	NA	NA	NA	NA
Acenaphthene	--	NA	NA	NA	NA	NA	NA	NA
Acenaphthylene	--	NA	NA	NA	NA	NA	NA	NA
Acetophenone	--	NA	NA	NA	NA	NA	NA	NA
Anthracene	--	NA	NA	NA	NA	NA	NA	NA
Atrazine	--	NA	NA	NA	NA	NA	NA	NA
Benzaldehyde	--	NA	NA	NA	NA	NA	NA	NA
Benzo(a)anthracene	2.1	0.33 J	0.76	ND(0.34)	1.0	ND(3.6)	6.8	ND(1.8)
Benzo(a)pyrene	0.2	0.38	0.84	ND(0.34)	1.2	ND(3.6)	6.2	ND(1.8)
Benzo(b)fluoranthene	2	0.52	1.1	ND(0.34)	1.4	ND(3.6)	5.0	ND(1.8)
Benzo(g,h,i)perylene	--	NA	NA	NA	NA	NA	NA	NA
Benzo(k)fluoranthene	--	NA	NA	NA	NA	NA	NA	NA
Biphenyl	--	NA	NA	NA	NA	NA	NA	NA
Bis(2-chloroethoxy) methane	--	NA	NA	NA	NA	NA	NA	NA
Bis(2-chloroethyl) ether	--	NA	NA	NA	NA	NA	NA	NA
bis(2-Ethylhexyl)phthalate	--	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER 'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in parts per million, ppm)

Sample ID: Sample Depth(Feet): Parameter Date Collected:	Performance Standard	MSSS-F02 0 - 1 12/08/03	MSSS-F03 0 - 1 12/08/03	MSSS-F04 0 - 1 12/08/03	MSSS-F06 0 - 1 12/08/03	MSSS-F08 0 - 1 12/18/03	MSSS-F09 0 - 1 12/18/03	MSSS-F10 0 - 1 12/18/03
Butyl benzyl phthalate	--	NA	NA	NA	NA	NA	NA	NA
Caprolactam	--	NA	NA	NA	NA	NA	NA	NA
Carbazole	--	NA	NA	NA	NA	NA	NA	NA
Chrysene	--	NA	NA	NA	NA	NA	NA	NA
Di-n-Butylphthalate	--	NA	NA	NA	NA	NA	NA	NA
Di-n-Octylphthalate	--	NA	NA	NA	NA	NA	NA	NA
Dibenz(a,h)anthracene	--	NA	NA	NA	NA	NA	NA	NA
Dibenzofuran	--	NA	NA	NA	NA	NA	NA	NA
Diethyl phthalate	--	NA	NA	NA	NA	NA	NA	NA
Dimethyl phthalate	--	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	--	NA	NA	NA	NA	NA	NA	NA
Fluorene	--	NA	NA	NA	NA	NA	NA	NA
Hexachlorobenzene	--	NA	NA	NA	NA	NA	NA	NA
Hexachlorobutadiene	--	NA	NA	NA	NA	NA	NA	NA
Hexachlorocyclopentadiene	--	NA	NA	NA	NA	NA	NA	NA
Hexachloroethane	--	NA	NA	NA	NA	NA	NA	NA
Indeno(1,2,3-c,d)pyrene	--	NA	NA	NA	NA	NA	NA	NA
Isophorone	--	NA	NA	NA	NA	NA	NA	NA
N-Nitroso-Di-n-propylamine	--	NA	NA	NA	NA	NA	NA	NA
N-Nitrosodiphenylamine (1)	--	NA	NA	NA	NA	NA	NA	NA
Naphthalene	--	NA	NA	NA	NA	NA	NA	NA
Nitrobenzene	--	NA	NA	NA	NA	NA	NA	NA
Pentachlorophenol	--	NA	NA	NA	NA	NA	NA	NA
Phenanthrene	--	NA	NA	NA	NA	NA	NA	NA
Phenol	--	NA	NA	NA	NA	NA	NA	NA
Pyrene	--	NA	NA	NA	NA	NA	NA	NA
Inorganics								
Arsenic	11	22.2	ND(8.90)	ND(8.80)	12.1	ND(9.00)	ND(8.40)	12.8
Miscellaneous Parameters								
Total Organic Carbon	--	NA	NA	NA	NA	NA	NA	NA

TABLE 6
MILL STREET AREA NON-PCB SOIL DATA

PRE-DESIGN SOIL INVESTIGATION SAMPLING
FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE
(Results are presented in dry weight parts per million, ppm)

Notes:

1. Samples were collected by Blasland Bouck & Lee, Inc., and submitted to Severn Trent Laboratories, Inc. for analysis of VOCs, SVOCs, arsenic and total organic carbon.
2. NA - Not Analyzed.
3. ND - Analyte was not detected. The number in parentheses is the associated detection limit.
4. Field duplicate sample results are presented in brackets.
5. Only those constituents detected in one or more samples are summarized.
6. In the areas where temporary cover materials have been placed (e.g., geotextile and soil cover), the 0- to 1-foot surface soil sampling interval will begin at the depth of the geotextile installed by EPA, which is considered to represent the boundary between clean barrier soils and native Site soils.
7. -- Indicates no corresponding performance standard for this constituent.
8. - Indicates detection limit which is greater than the performance standard of the associated constituent.
9. - Indicates exceedance of performance standard.

Data Qualifiers:

Organics (volatiles, semivolatiles)

B - Analyte was also detected in the associated method blank.
D - Compound quantitated using a secondary dilution.
E - Analyte exceeded calibration range.
J - Indicates an estimated value less than the practical quantitation limit (PQL).

Inorganics

N - Indicates sample matrix spike analysis was outside control limits.

Historical EPA Data

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Table 1

Existing PCB Sample Data

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

TABLE 1
EXISTING PCB SOIL SAMPLE DATA

PRE-DESIGN WORK PLAN
FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NH

SAMPLE ID	DEPTH	DATE	TOTAL PCBs (ppm)
ELM STREET			
1-CG-S07-A	0-2	1/15/2001	0.023 J
1-CG-S08-A	2-4	1/15/2001	ND(0.042)
1-CG-S09-A	4-6	1/15/2001	ND(0.042)
1-CS-S01-A	0-1	1/10/2001	1.20
1-CS-S02-A	0-1	1/10/2001	0.20
1-CS-S03-A	0-1	1/10/2001	2.20 [1.90]
2-CG-S01-A	0-2	1/15/2001	3.40
2-CG-S02-A	2-4	1/15/2001	ND(0.040)
2-CG-S03-A	4-6	1/15/2001	ND(0.044)
2-CG-S04-A	0-2	1/15/2001	4.90
2-CG-S05-A	2-4	1/15/2001	27.90
2-CG-S06-A	4-6	1/15/2001	218
2-CS-S04-A	0-1	1/15/2001	111
2-CS-S05-A	0-1	1/17/2001	1,560
3-CS-S06-A	0-1	1/17/2001	9.60
3-CS-S07-A	0-1	1/17/2001	3.90
3-CS-S08-A	0-1	1/17/2001	7.90
3-CS-S09-A	0-1	1/17/2001	1.40
EB-01A	40-41.5	10/30/91	ND*
EB-01B	20-21.5	11/04/91	ND*
EB-02A	1-3	10/30/92	12.0
EB-02A	24-28	10/30/92	1.2 J
EB-02B	25-28	11/21/93	0.46
EB-03A	45-46.5	11/08/91	0.041
EB-03B	7-9	11/13/91	20.0 J
EB-03B	11-13	11/13/91	150 J
EB-03B	15-21	11/13/91	3.70 J
EB-03B	15-21	11/13/91	5.70 J
EB-04A	17-19	11/19/91	0.29
EB-05A	12-14	11/21/91	0.027 J
EB-05A	42-44	11/21/91	ND(0.086)
EB-06C	20-22	11/26/91	ND(0.084)
EB-06C	53-55	12/02/91	ND(0.073)
EB-11A	30-31.5	12/04/91	0.023 J
EB-11A	73-77	12/04/91	ND(0.074)
EB-15	1-2.5	11/06/91	5,000 J
EB-15	24-26	11/06/91	8.8 J
EB-16	20-21.5	11/14/91	0.069 J
EB-16	38-39.5	11/14/91	0.019 J
EB-17	10-12	11/04/91	11.0 J

See Notes on Page 4.

TABLE 1
EXISTING PCB SOIL SAMPLE DATA

PRE-DESIGN WORK PLAN
FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NH

SAMPLE ID	DEPTH	DATE	TOTAL PCBs (ppm)
ELM STREET (continued)			
EB-17	27-29	11/05/91	90.0 J
EB-18B	17-18	12/12/91	ND(0.077)
EB-18B	22-25	12/12/91	ND(0.080)
EB-18B	55-56.5	12/12/91	ND(0.077)
EB-20A	0-4	11/30/93	6.20 J
EB-20A	0-4	11/30/93	0.130
EB-20A	12-14	11/30/93	2.60 J
EB-20A	26-30	12/01/93	13.0 J
SS-04	0-0.5	12/03/91	ND(0.3)
SS-04	7-9	12/03/91	0.052
SS-15	0-1	11/09/93	1,100 J
SS-16	0-1	11/04/93	1.97 J
SS-17	0-1	11/09/93	550 J
SS-18	0-1	11/04/93	7.8 J
SS-19	0-1	11/09/93	227
SS-20	0-1	11/09/93	311
SS-21	0-1	11/08/93	280 J
SS-22	0-1	11/09/93	2.8 J
SS-23	0-1	11/09/93	93.0 J
SS-24	0-1	11/09/93	ND*
SS-25	0-1	11/04/93	1.09 J
SS-26	0-1	11/10/93	1,300 J
SS-27	0-1	11/08/93	1.54 J
SS-28	0-1	11/09/93	14.6 J
SS-29	0-1	11/08/93	0.196 J
SS-32	0-1	11/05/93	ND*
SS-33	0-1	11/05/93	0.088 J
SS-34	0-1	11/05/93	0.019 J
SS-35	0-1	11/08/93	ND*
SS-36	0-1	11/08/93	0.107
SS-37	0-1	11/08/93	ND*
SS-37 DUP	0-1	11/08/93	ND*
SS-38	0-1	11/09/93	100.0 J
SS-39	0-1	11/08/93	19.8 J
SS-39 DUP	0-1	11/08/93	21.1 J
SS-40	0-1	11/10/93	2.07 J
SS-40	0-1	11/10/93	8.20 J

See Notes on Page 4.

TABLE 1
EXISTING PCB SOIL SAMPLE DATA

PRE-DESIGN WORK PLAN
FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NH

SAMPLE ID	DEPTH	DATE	TOTAL PCBs (ppm)
MILL STREET			
EB-07A	4-5.5	11/15/91	0.89
EB-08A	4-6	12/11/91	ND(0.076)
EB-09A DUP	4-8	12/02/91	0.220
EB-09A DUP	4-8	12/02/91	0.210
EB-10A	8-9.5	11/20/91	ND(0.080)
EB-10A	17.5-20	11/20/91	ND(0.075)
EB-11A	30-31.5	12/04/91	0.023 J
EB-11A	73-77	12/09/91	ND(0.074)
EB-12	1-3	11/06/91	26,700 J
EB-13	5-8.5	11/13/91	13.0 J
EB-13	15-16.5	11/13/91	1.40 J
EB-14	4-6	11/07/91	20.0
EB-14	12-16	11/07/91	0.99
EB-19	18-21.5	12/10/91	ND(0.16)
EB-21C	0-4	11/22/93	9,400 J
EB-21C DUP	0-4	11/22/93	9,600 J
EB-21C	0-4	11/22/93	100.0
EB-21C	0-4	11/22/93	89.0
EB-21C	8-10	11/22/93	780 J
EB-21C	12-14	11/22/93	190 J
SS-01	0-0.5	11/19/91	3.0
SS-01	6-7	11/19/91	0.072
SS-02	0-0.5	11/20/91	6.9
SS-02	6.5-8	11/20/91	0.079
SS-03	0-0.5	12/02/91	42.0
SS-03	5.5-7.5	12/02/91	0.32
SS-05	0-1	11/04/93	19.0 J
SS-06	0-1	11/04/93	0.32 J
SS-07	0-1	11/04/93	36.0 J
SS-08	0-1	11/04/93	13.0 J
SS-09	0-1	11/04/93	2.90 J
SS-10	0-1	11/04/93	1.60 J
SS-11	0-1	11/04/93	5.40 J
SS-11	0-1	11/04/93	3.00 J
SS-12	0-1	11/04/93	6.29 J
SS-13	0-1	12/02/93	7.60 J
SS-14	0-1	11/04/93	20.80 J

See Notes on Page 4.

TABLE 1
EXISTING PCB SOIL SAMPLE DATA

PRE-DESIGN WORK PLAN
FLETCHER PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NH

Notes:

1. J = Estimated.
2. ND = Not detected. Detection limits are presented in parentheses (if available).
3. ND* = Not detected (* = information concerning detection limit is not available).
4. Duplicate results are presented in brackets.
5. Data from samples beginning with SS (surface sample) or EB (exploratory boring) were obtained from the following sources:
   Elm or Mill Street Surface Soil Chemical Data Summary Tables (Tables 4-13 and 4-22, respectively); and Elm or Mill Street Exploratory Boring Sampling Chemical Data Sumr. ary Tables (Tables 4-14 and 4-23, respectively). Detection limits and sample dates for certain samples were obtained from other tables or boring logs contained in the *Final Remedial Investigation for Fletcher's Paint Site,* Milford, NH, July 1, 1994.
6. Data from samples with CG (confirmatory geoprobe) or CS (confirmatory surface) prefixes are samples collected during building demolition activities performed by EPA at the Elm Street Area between December 2000 and January 2001. Split samples were collected by Blasland, Bouck & Lee, Inc. and submitted to CT&E Environmental Services, Inc. for PCB analyses.

Table 2

Existing Non-PCB Soil Sample Data

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engineers, scientists, economists

TABLE 2
EXISTING NON-PCB SOIL SAMPLE DATA

PRE-DESIGN WORK PLAN
FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NH

SAMPLE ID	DEPTH	DATE	ARSENIC (ppm)	BENZO(A) ANTHRACENE (ppm)	BENZO(A) PYRENE (ppm)	BENZO(B) FLUORANTHENE (ppm)
ELM STREET						
EB-01A	40-41.5	10/30/91	4.1 J	ND*	ND*	ND*
EB-01B	20-21.5	11/04/91	3.3 J	0.270 J	0.230 J	0.660 J
EB-02A	1-3	10/30/92	3.7	ND*	ND*	ND*
EB-02A	24-28	10/30/92	11.5 J	R	R	R
EB-02B	25-28	11/21/93	7.8	0.086 J	0.095 J	0.110 J
EB-03A	45-46.5	11/08/91	ND*	R	R	R
EB-03B	7-9	11/13/91	7.7	0.025	0.034	0.050
EB-03B	11-13	11/13/91	6.4	ND*	ND*	ND*
EB-03B	15-21	11/13/91	2.6	R	R	R
EB-03B	15-21	11/13/91	4.6	ND*	ND*	ND*
EB-04A	17-19	11/19/91	3.1	ND*	ND*	ND*
EB-05A	12-14	11/21/91	5.2	ND*	ND*	ND*
EB-05A	42-44	11/21/91	7.8	ND*	ND*	ND*
EB-06C	20-22	11/26/91	3.6	ND*	ND*	ND*
EB-06C	53-55	12/02/91	7.1	ND*	ND*	ND*
EB-11A	30-31.5	12/04/91	6.1	R	R	R
EB-11A	73-77	12/04/91	5 J	ND*	ND*	ND*
EB-15	1-2.5	11/06/91	7.5 J	ND*	ND*	ND*
EB-15	24-26	11/06/91	6.1 J	ND*	ND*	ND*
EB-16	20-21.5	11/14/91	1.6 J	0.082 J	0.080 J	0.085 J
EB-16	38-39.5	11/14/91	3 J	ND*	ND*	ND*
EB-17	10-12	11/04/91	5.6 J	0.750 J	0.570 J	1.6 J
EB-17	27-29	11/05/91	7.8 J	R	R	R
EB-18B	17-18	12/12/91	11.7 J	0.810	0.750	0.760
EB-18B	22-25	12/12/91	1.8 J	0.046 J	0.042 J	0.049 J
EB-18B	55-56.5	12/12/91	1.2 J	ND*	ND*	ND*
EB-20A	0-4	11/30/93	19.3	0.039 J	0.041 J	0.039 J
EB-20A	0-4	11/30/93	NA	NA	NA	NA
EB-20A	12-14	11/30/93	6.2	0.840	1.3	1.5
EB-20A	26-30	12/01/93	16.5	NA	NA	NA
SS-04	0-0.5	12/03/91	9.7	0.260 J	0.220 J	0.270 J
SS-04	7-9	12/03/91	7.5	ND*	0.044 J	0.047 J
SS-15	0-1	11/09/93	11	ND*	ND*	ND*
SS-16	0-1	11/04/93	R	NA	NA	NA
SS-17	0-1	11/09/93	5.6	0.038 J	0.080 J	0.094 J
SS-18	0-1	11/04/93	R	NA	NA	NA
SS-19	0-1	11/09/93	R	NA	NA	NA
SS-20	0-1	11/09/93	6.7	0.900	0.880 J	0.740 J
SS-21	0-1	11/08/93	26	NA	NA	NA
SS-22	0-1	11/09/93	6	NA	NA	NA
SS-23	0-1	11/09/93	7.2	ND*	ND*	ND*
SS-24	0-1	11/09/93	2.8	NA	NA	NA
SS-25	0-1	11/04/93	R	NA	NA	NA
SS-26	0-1	11/10/93	R	NA	NA	NA
SS-27	0-1	11/08/93	8	NA	NA	NA

See Notes on Page 3.

TABLE 2
EXISTING NON-PCB SOIL SAMPLE DATA

PRE-DESIGN WORK PLAN
FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NH

SAMPLE ID	DEPTH	DATE	ARSENIC (ppm)	BENZO(A) ANTHRACENE (ppm)	BENZO(A) PYRENE (ppm)	BENZO(B) FLUORANTHENE (ppm)
ELM STREET (continued)						
SS-28	0-1	11/09/93	5.8	NA	NA	NA
SS-29	0-1	11/08/93	15.8	NA	NA	NA
SS-32	0-1	11/05/93	8.1 J	NA	NA	NA
SS-33	0-1	11/05/93	8.4 J	NA	NA	NA
SS-34	0-1	11/05/93	14.4 J	NA	NA	NA
SS-35	0-1	11/08/93	4.4	0.160 J	0.150 J	0.120 J
SS-36	0-1	11/08/93	4.9	ND*	ND*	0.043 J
SS-37	0-1	11/08/93	6.9	0.100 J	0.093 J	0.100 J
SS-37 DUP	0-1	11/08/93	5.6	ND*	0.048 J	0.055 J
SS-38	0-1	11/09/93	R	1 J	1.1 J	0.910 J
SS-39	0-1	11/08/93	9.6	0.056 J	0.056 J	0.069 J
SS-39 DUP	0-1	11/08/93	6.2	2.7 J	2.6 J	2.2 J
SS-40	0-1	11/10/93	R	0.420	0.520	0.610
SS-40	0-1	11/10/93	R	0.430	0.470	0.550
MILL STREET						
EB-07A	4-5.5	11/15/91	4.8 J	0.055 J	0.060 J	0.082 J
EB-08A	4-6	12/11/91	2.7 J	ND*	ND*	ND*
EB-08A	26-28	12/11/91	NA	ND*	ND*	ND*
EB-09A	22-23	12/09/91	1.3 J	ND*	ND*	ND*
EB-09A DUP	4-8	12/02/91	3.9	ND*	ND*	ND*
EB-09A DUP	4-8	12/02/91	ND*	R	R	R
EB-10A	8-9.5	11/20/91	1.5 J	ND*	ND*	ND*
EB-10A	17.5-20	11/20/91	1.9 J	ND*	ND*	ND*
EB-11A	30-31.5	12/04/91	6.1	R	R	R
EB-11A	73-77	12/09/91	5 J	ND*	ND*	ND*
EB-12	1-3	11/06/91	22.5 J	ND*	ND*	ND*
EB-13	5-8.5	11/13/91	3.1	ND*	ND*	ND*
EB-13	15-16.5	11/13/91	1.5 J	ND*	ND*	ND*
EB-14	4-6	11/07/91	3.1 J	0.065 J	0.039 J	0.100 J
EB-14	12-16	11/07/91	ND*	R	R	R
EB-19	18-21.5	12/10/91	2.2 J	ND*	ND*	ND*
EB-21C	0-4	11/22/93	21.7	ND*	ND*	ND*
EB-21C DUP	0-4	11/22/93	18.7	ND*	ND*	2.1 J
EB-21C	0-4	11/22/93	NA	NA	NA	NA
EB-21C	0-4	11/22/93	NA	NA	NA	NA
EB-21C	8-10	11/22/93	3.9	ND*	ND*	ND*
EB-21C	12-14	11/22/93	3.1	ND*	ND*	ND*
SS-01	0-0.5	11/19/91	6.6	6.4	6.8	3
SS-01	6-7	11/19/91	5.4	ND*	ND*	ND*
SS-02	0-0.5	11/20/91	6.5	0.660	0.740	0.700
SS-02	6.5-8	12/02/91	2.9	ND*	ND*	ND*
SS-03	0-0.5	12/02/91	11	2.1	2.1	2.3
SS-03	5.5-7.5	12/02/91	ND*	0.130 J	0.110 J	0.150 J
SS-05	0-1	11/04/93	7.1 J	NA	NA	NA

See Notes on Page 3.

TABLE 2
EXISTING NON-PCB SOIL SAMPLE DATA

PRE-DESIGN WORK PLAN
FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE
GENERAL ELECTRIC COMPANY - MILFORD, NH

SAMPLE ID	DEPTH	DATE	ARSENIC (ppm)	BENZO(A) ANTHRACENE (ppm)	BENZO(A) PYRENE (ppm)	BENZO(B) FLUORANTHENE (ppm)
MILL STREET (continued)						
SS-06	0-1	11/04/93	8.5 J	NA	NA	NA
SS-07	0-1	11/04/93	12.3 J	NA	NA	NA
SS-08	0-1	11/04/93	9.2 J	NA	NA	NA
SS-09	0-1	11/04/93	6.2 J	0.820	0.650	0.600
SS-10	0-1	11/04/93	7.4 J	NA	NA	NA
SS-11	0-1	11/04/93	5.8 J	NA	NA	NA
SS-11	0-1	11/04/93	10.1 J	NA	NA	NA
SS-12	0-1	11/04/93	19.2	0.950	1.1 J	1.5 J
SS-13	--	12/02/93	3.4 J	NA	NA	NA
SS-14	--	11/04/93	R	NA	NA	NA

Notes:
1. J = Estimated.
2. R = Rejected.
3. NA = Not Analyzed.
4. ND* = Not detected (* = information concerning detection limit is not available).
5. Data from samples beginning with SS or EB were obtained from the following sources: Elm or Mill Street Surface Soil Chemical Data Summary Tables (Tables 4-13 and 4-22, respectively); and Elm or Mill Street Exploratory Boring Sampling Chemical Data Summary Tables (Tables 4-14 and 4-23, respectively). Detection limits and sample dates for certain samples were obtained from other tables or boring logs contained in the *Final Remedial Investigation for Fletcher's Paint Site*, Milford, NH, July 1, 1994.

Draft for EPA Review

EPA Letter Approving Surface Soil Sampling Proposal dated March 31, 2004

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

March 31, 2004

Mr. Lewis Streeter
General Electric Company
320 Great Oaks Office Park
Suite 323
Albany, NY 12203

Re: Schedule for Second half of Phase II Activities and the Pre-Design Report Submittal

Dear Mr. Streeter:

This letter is in response to your February 24, 2004 letter requesting an approval to initiate the spring field work 15 days following receipt of EPA approval of the proposed step in/step out sampling plan. Therefore GE shall initiate this spring round of activities no later than April 15, 2004.

As you are aware EPA and GE met on March 25, 2004 to discuss GE's proposed step in/step out soils boring proposal. With this letter, EPA grants approval of the **surface soils** sampling proposal with the following additions:

ELM STREET AREA

1) GE shall add 5 additional surface soils along the top of the cemetery wall; adjacent to the asphalt gulley which was used formally to channel roof water off of the Fletcher's Paint building. The roofing materials were found to contain PCBs. EPA may request additional samples in this vicinity upon review of this data.

2) GE shall advance the ESSS-HO3 surface soil sampling location and collect, extract and analyze the next foot interval (1-2') and collect, extract and hold the 2-3' interval. The 2-3' interval shall be analyzed if the 1-2' interval exceeds 1 ppm total PCBs. EPA may request additional samples in this vicinity upon review of this data.

3) EPA grants approval of GE's request to collect only surface soils along the banks of the Elm Street site adjacent to the Souhegan River with the following understanding: GE will design and, during the excavation of the soils as part of the remedial action, excavate the entire bank, from the outermost edge of the property, into the site, at the same elevation as soil samples found to be exceeding cleanup standards in the borings taken at the top of the bank. GE will also remove any soils from the river bank, exceeding a cleanup standard, in those areas not covered by the

situation described above. EPA retains the authority to require confirmation samples as part of the Remedial Action, including during the excavation of the bank to ensure that contaminated soils are not left in place in exceedence of the cleanup standards.

MILL STREET AREA

4) Surface soil locations specified for the spring round, and located in the vicinity of the northern-most set of railroad tracks will be collected. The issue of the subsurface borings in those same locations will be in a separate letter.

5) Surface soil locations that are located along the middle of Mill Street, across from the residential cleanup which required 3 feet of excavation, shall have samples collected, extracted and analyzed for the 0-1', 1-2' and 2-3' intervals. In the event that the southernmost boring from MSSB-E13 is not collected, then GE shall take a surface soil sample from this location and have the samples collected, extracted and analyzed for the 0-1', 1-2' and 2-3' intervals.

6) It is EPA's understanding that GE will collect and analyze the surface soils along the middle of Mill Street from the intersection of Mill and Cottage to the end of the Racicot property. In the occurrance of an exceedance of the cleanup level of 1 ppm PCB in these samples, GE agrees that additional samples will not be collected but rather the design and the remedial action shall include cleanup across the entire width of Mill Street to the boundary already established under previous removal actions. A sample taken from the middle of the Mill Street, which does not exhibit an exceedance of 1 ppm PCB does not automatically mean that cleanup will not be required between that boring and the residential properties. Given that all of the residential properties required an excavation to a minimum of 1 foot along Mill Street, it would remain likely that PCB contamination would exist under the asphalt at the boundary of the residential properties and Mill Street.

EPA requests that revised maps be provided which include the additions outlined above before April 13, 2004. EPA further requires that GE produce surface soils data within 3 weeks of collection, (which should accommodate your two week lab turnaround) so that GE may propose and EPA review the need for additional sampling locations during this spring event.

EPA understands that GE agreed to review and resubmit the subsurface program based on discussion with and comments made by EPA at the March 25, 2004 meeting. EPA will provide a separate approval letter for that program upon review of the new maps. EPA expects to receive these subsurface maps by April 2, 2004, to allow for an expedited review.

With this EPA approval, a meeting should be arranged with the Town of Milford to discuss the approved sampling events and any potential Town impacts.

If you have any questions regarding the contents of this letter , please call me at 617/918-1244.

Sincerely,

Cheryl L. Sprague
Remedial Project Manager
Office of Site Restoration and Remediation

cc: Scott Acone, COE
Mike Jasinski, EPA
Tom Andrews, NHDES
Bonnie Harrington, GE
John Beling, EPA

Corey Averhill, BBL
Katie Chambers, Milford
Tom Roy, Aries Engineering
Bill Ruoff, Milford

Draft for EPA Review

BBL e-mail to EPA Providing Revised Subsurface Delineation Sampling Figures dated April 2, 2004 (excluding figures)

BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

COREY AVERILL

From: COREY AVERILL

From: COREY AVERILL [mailto:CRA@bbl-inc.com]
Sent: Friday, April 02, 2004 6:54 PM
To: sprague.cheryl@epa.gov
Cc: LEANNE M. ROULIER; LOWELL MCBURNEY; Harrington, Bonnie (Corporate); Streeter, Lewis S. (Corporate); tandrews@des.state.nh.us; beliveau.andy@epa.gov; Scott.E.Acone@nae02.usace.army.mil
Subject: Revised Subsurface Delineation Sampling Figures

Hi Cheryl,

As requested in your March 31, 2004 letter, the attached files present revised versions of the subsurface soil delineation sampling figures for the Elm and Mill Street Sites (Figures 1 and 4, respectively, of our March 17, 2004 submittal). We'll forward an electronic version of the revised PCB delineation sampling summary tables on Monday morning.

GE/BBL have revised these figures in accordance with our discussions during the data review meeting on March 25, 2004 and additional comments provided in your letter dated March 31, 2004. The attached figures present revisions only to the subsurface samples proposed in our March 17, 2004 submittal. As requested in your letter, revisions to the surface samples proposed in that same submittal will be addressed in revised mapping which will be submitted to you by April 13, 2004.

Based on EPA comments/requests during the data review meeting and your March 31 letter, the following revisions were made to the attached figures:

Elm Street

- The depth of sample collection and analysis for all proposed delineation soil borings was extended to one interval below the deepest exceedance. For example, soil boring Q12 has an exceedance of the subsurface soil cleanup level (SCL) at 4 feet below grade. Therefore, the depth of completion for the delineation soil borings associated with soil boring Q12 is listed as 6 feet below grade.
- A soil boring was added to location H03. Samples will be collected from the 1- to 2-foot and 2- to 3-foot depth intervals at this location. However, the sample from the 2- to 3-foot depth interval will be held for analysis pending the results of the sample collected from the 1- to 2-foot depth interval.
- Delineation soil borings were added around certain locations where the detected PCB concentration in surface soils was greater than the subsurface SCL of 100 ppm. These locations include: L15, P17, S11, SS-15, SS-17, SS-19, SS-20, SS-21, and SS-38.
- The proposed depth of sample collection and analysis at the delineation soil borings for K16, K18, and EB-15/O14 were extended to one interval below the observed water table.
- The proposed depth of sample collection and analysis at the delineation soil borings for EB-03 were extended to 17 feet below grade.
- The proposed delineation soil borings to the east of locations K18, M18, and O18 were all relocated approximately 10 feet to the east.
- Certain soil borings (e.g., I08, K16, Q16, etc.) have isolated exceedances of the subsurface SCL. In the delineation soil borings for such locations, GE/BBL is proposing to collect and analyze soil samples from the depth intervals above, at, and below the exceedance. As requested by EPA, the color of such soil borings has been changed for easier identification.
- BBL has increased the spacing of the proposed delineation soil borings in three areas of the site. To the extent that site conditions and existing data permit, the revised borings were located on an approximate 25' spacing from the sample requiring delineation (i.e., at intermediate grid nodes). As a result, certain delineation soil borings for adjacent sample locations were combined. The three areas in question are as

follows (sample IDs represent borings with exceedances):

- I06/I08/EB-03
- O14/O16/O18
- K16/K18

Should enough of the samples from the delineation soil borings around these areas contain PCB concentrations below the subsurface SCL, GE/BBL anticipates another mobilization will be required to collect additional delineation soil samples using the "step-in" delineation sampling methodology. Conversely, GE/BBL would also anticipate an additional mobilization should some of the delineation soil borings contain PCBs at concentrations greater than the subsurface SCL and sufficient existing data are not available to delineate such exceedances. If additional surface and/or subsurface sampling is necessary, the current schedule for completion of the PDI report will need to be extended. The proposed "step-in/step-out" delineation methodology is presented herein and is consistent with the objectives stated in the November 2003 Pre-Design Work Plan (Sections 4.5.1.1 and 4.5.1.2) as well as Comment #7 of EPA's November 5, 2003 letter to GE and GE's/BBL's response to Comment #48b of EPA's May 1, 2003 letter to GE.

Mill Street

- Delineation soil borings have been added south of SF-03g-1 and SF-03g-1. In addition, the soil boring proposed for location E13SS has been modified to reflect that the samples will be collected and analyzed from the 1- to 2-foot and 2- to 3-foot depth interval (the 0- to 1-foot depth interval at this location will be addressed in forthcoming revisions to the surface sampling figures).
- The proposed delineation soil boring C07N was moved approximately 10 feet to the northwest.
- Based on comments provided by EPA regarding EPA's spill policy at commercially-zoned properties, the delineation soil borings around existing soil boring C01 were deleted.
- At the end of the March 25 meeting, EPA stated that the delineation borings located along the railroad tracks for locations B13, C14, C15, and B17/C17 should be eliminated due to the low detected concentrations of PCBs (i.e., concentrations marginally greater than the 1 ppm subsurface SCL) in isolated sample intervals. Upon further review of the data, GE/BBL is unclear as to the extent of delineation sampling required around certain soil borings (e.g., C14, C15, C17) which contain isolated, marginal exceedances of the subsurface SCL at Mill Street. As such, GE/BBL would like to propose a call to further discuss the need for delineation soil borings in the vicinity of the soil borings specified above.

BBL will be forwarding copies of the revised subsurface delineation sampling plans to you tonight via Fedex. In the interim, please contact either Lew or myself should you have any additional questions or comments on the information summarized herein.

Sincerely,

Corey

Corey R. Averill
Manager
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Syracuse, NY 13214

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Draft for EPA Review

GE Response to EPA March 31, 2004 Comment Letter dated April 12, 2004 (excluding figures)

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

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Transmitted via Federal Express

April 12, 2004

Ms. Cheryl Sprague
Remedial Project Manager
Office of Site Remediation and Restoration
U.S. Environmental Protection Agency
One Congress Street, Suite 1100 (HBO)
Boston, MA 02114-2023

Re: Response to EPA March 31, 2004 Surface Soil Sampling Approval Letter
Pre-Design Delineation Soil Sampling Proposal
Fletcher's Paint Works and Storage Facility Superfund Site, Operable Unit 1
Milford, New Hampshire
CERCLA Docket No. 01-2001-0063

Dear Ms. Sprague:

On March 25, 2004, the General Electric Company (GE) and its subcontractor Blasland, Bouck & Lee Inc., (BBL) attended a meeting with representatives of the United States Environmental Protection Agency (EPA), the U.S. Army Corps of Engineers, and New Hampshire Department of Environmental Services. The purpose of the meeting was to provide the EPA with an overview of the pre-design investigation data collected to date at the above-listed Site, and propose supplemental PCB delineation soil sampling activities at certain locations where the limits of soil containing PCBs in excess of the EPA-specified soil cleanup levels (SCLs) had not been delineated. In support of those discussions, BBL distributed supplemental information packages which included data summary tables and several figures illustrating the locations at which we were proposing to collect additional PCB delineation soil samples. EPA representatives provided preliminary comments on the scope of the proposed activities at the March 25, 2004 meeting and additional comments are contained in your March 31, 2004 conditional approval letter. In response to EPA's request, revised subsurface PCB delineation sampling figures were submitted on April 2, 2004.

The March 31 conditional approval letter provided several comments regarding the scope of the proposed PCB surface soil delineation sampling activities at the Site and requested that revised figures incorporating those comments be provided to EPA by April 13, 2004. The requested figures and revised PCB delineation soil sampling tables are attached. The remainder of this letter presents GE's responses to the comments contained in your March 31, 2004 approval letter (EPA comments are provided first in italics, followed by GE's response).

ELM STREET AREA

1) *GE shall add 5 additional surface soils along the top of the cemetery wall; adjacent to the asphalt gulley which was used formally to channel roof water off of the Fletcher's Paint building. The roofing materials were found to contain PCBs. EPA may request additional samples in this vicinity upon review of this data.*

   Five surface soil samples will be collected along the top of the cemetery wall and adjacent to the asphalt drainage swale. These samples will be submitted for analysis of PCBs. Since the survey performed during Phase 1 of the Pre-Design Investigation did not include the area within the cemetery, the general location of these samples is indicated on Figure 1. The sample locations will be evenly spaced at locations adjacent to the drainage swale. Once selected, the locations will be surveyed in the field.

2) *GE shall advance the ESSS-HO3 surface soil sampling location and collect, extract and analyze the next foot interval (1-2') and collect, extract and hold the 2-3' interval. The 2-3' interval shall be analyzed if the 1-2' interval exceeds 1 ppm total PCBs. EPA may request additional samples in this vicinity upon review of this data.*

   The requested soil boring has been added to Figure 1. However, GE/BBL is assuming that the request to analyze the sample from the 2- to 3-foot depth interval if the sample from the 1- to 2-foot depth interval is greater than 1 ppm was an unintended error, since the EPA-specified subsurface SCL for the Elm Street Area is 100 ppm. Therefore, we are proposing that the sample from the 2- to 3-foot depth interval be analyzed if the sample from the 1- to 2-foot depth interval contains PCBs at a level greater than 100 ppm. Although not specifically discussed in EPA's March 31 conditional approval letter, GE/BBL has proposed a similar sampling and analysis methodology at all locations where existing surface soil samples contain PCBs at concentrations greater than 100 ppm (i.e., L15, P17, S11, SS-15, SS-17, SS-19, SS-20, SS-21, SS-26, and SS-38).

3) *EPA grants approval of GE's request to collect only surface soils along the banks of the Elm Street site adjacent to the Souhegan River with the following understanding: GE will design and, during the excavation of the soils as part of the remedial action, excavate the entire bank, from the outermost edge of the property, into the site, at the same elevation as soil samples found to be exceeding cleanup standards in the borings taken at the top of the bank. GE will also remove any soils from the river bank, exceeding a cleanup standard, in those areas not covered by the situation described above. EPA retains the authority to require confirmation samples as part of the Remedial Action, including during the excavation of the bank to ensure that contaminated soils are not left in place in exceedence of the cleanup standards.*

   During the March 25 meeting, this topic was discussed with respect to the (in)ability to install soil borings along the riverbank, and thus the (in)ability to fully delineate the extent of soil exceeding the SCL prior to excavation. It is premature to commit to specific excavation limits at this point in time and GE/BBL believes that discussion of excavation limits should be only conducted as part of the remedial design, after the site(s) are completely delineated. However, GE/BBL recognizes that if certain samples contain PCBs at levels exceeding the applicable SCL, the limits of that exceedance should be delineated. If delineation is not possible due to site constraints (i.e., the river bank), the remedial design will account for this issue.

With respect to the need for confirmatory soil sampling, the intention of the pre-design investigation activities as stated in the PDI Work Plan, as approved by EPA, is to collect sufficient data such that the limits of excavation(s) can be defined during design of the remedy and therefore the collection of confirmatory soil samples will not be necessary. This is especially important since many of the excavations will be to depths requiring excavation controls (i.e., sheeting) and the collection of confirmatory soil samples on the sides of such excavations will not be possible.

MILL STREET AREA

4) *Surface soil locations specified for the spring round, and located in the vicinity of the northern-most set of railroad tracks will be collected. The issue of the subsurface borings in those same locations will be in a separate letter.*

   GE/BBL will collect the surface soil samples within the railroad property at the locations shown on Figure 2. An additional surface soil sample location was added north of sample location C18, as discussed in the March 25 meeting. Additional information regarding the need for certain soil borings within the railroad property was further addressed in the April 2, 2004 e-mail submittal from BBL to EPA.

5) *Surface soil locations that are located along the middle of Mill Street, across from the residential cleanup which required 3 feet of excavation, shall have samples collected, extracted and analyzed for the 0-1', 1-2' and 2-3' intervals. In the event that the southernmost boring from MSSB-E13 is not collected, then GE shall take a surface soil sample from this location and have the samples collected, extracted and analyzed for the 0-1', 1-2' and 2-3' intervals.*

   Soil borings have been added in the middle of Mill Street, south of sample locations SF-02g-1 and SF-03g-1, as shown on Figure 2. All collected samples will be submitted for analysis of PCBs.

6) *It is EPA's understanding that GE will collect and analyze the surface soils along the middle of Mill Street from the intersection of Mill and Cottage to the end of the Racicot property. In the occurrence of an exceedance of the cleanup level of 1 ppm PCB in these samples, GE agrees that additional samples will not be collected but rather the design and the remedial action shall include cleanup across the entire width of Mill Street to the boundary already established under previous removal actions. A sample taken from the middle of the Mill Street, which does not exhibit an exceedance of 1 ppm PCB does not automatically mean that cleanup will not be required between that boring and the residential properties. Given that all of the residential properties required an excavation to a minimum of 1 foot along Mill Street, it would remain likely that PCB contamination would exist under the asphalt at the boundary of the residential properties and Mill Street.*

   BBL will collect and analyze samples down the center of Mill Street at the locations shown on Figure 2. In keeping with the current approach, if a surface soil sample collected within the Mill Street right-of-way exceeds the SCL, either additional delineation will be proposed or the remedial design will account for the lack of delineation. However, as previously presented in our response to Comment #3, discussions of the scope of such remedial actions are more appropriate during the design of the Site remedy. Finally, we request clarification regarding the portion of Comment #6 stating that the surface soil samples collected within Mill Street that do not contain PCBs in excess of the surface SCL may not indicate the limit of excavation.

The intent of the additional soil investigations proposed in the attached figures is to completely delineate the extent of soils containing PCBs above the SCLs in order to define the limits of the excavations. This is the same approach specified in the PDI Work Plan, and approved by EPA, to eliminate the need for post excavation sampling. Consistent with this approach, additional delineation soil sampling activities may be required in the future based on the results of these investigations. GE is also anticipating the need to perform additional delineation soil sampling activities at the Elm Street Site once the exact location of the utility corridor is identified by the Town of Milford. Based on this additional investigation, the due date for the Pre-Design Investigation Report may need to be revised.

BBL has discussed these sampling activities with Town representatives. Although a specific date to review the details of street closures, etc., has not yet been scheduled, I will contact you once that meeting date is finalized.

Please contact me with any questions regarding the information contained herein.

Sincerely,

Lewis S. Streeter
Remedial Project Manager
V:\GE_Fletcher_Paint\Correspondence\20142196.doc

cc: Scott Acone, USACE
Tom Andrews, NHDES
Mike Jasinski, EPA
John Beling, EPA
Tom Roy, Aries Engineering
Bonnie Harrington, GE
Corey Averill, BBL
Katie Chambers, Town of Milford
Bill Ruoff, Town of Milford

TABLE 1
PCB DELINEATION SAMPLING - ELM STREET SITE
FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples											
				0-1'	1-3'	3-5'	5-7'	7-9'	9-11'	11-13'	13-15'	15-17'	17-19'	19-21'	21-23'
2-CG-S06A / Q16 (▲)	6'	218	Q16E	--	--	P (2' - 4')	P (4' - 6')	P (6' - 8')	--	--	--	--	--	--	--
			Q16N	--	--	P (2' - 4')	P (4' - 6')	P (6' - 8')	--	--	--	--	--	--	--
			Q16S	--	--	P (2' - 4')	P (4' - 6')	P (6' - 8')	--	--	--	--	--	--	--
			Q16W	--	--	P (2' - 4')	P (4' - 6')	P (6' - 8')	--	--	--	--	--	--	--
E02 / SS-18 (▲) (Δ)	1'	1.1 / 7.8	E02NE	P	--	--	--	--	--	--	--	--	--	--	--
			E02W	P	--	--	--	--	--	--	--	--	--	--	--
			F02	X	--	--	--	--	--	--	--	--	--	--	--
			SS-18E	P	--	--	--	--	--	--	--	--	--	--	--
EB-03B (▲)	13'	150	EB-03B	--	P	P	P	X	P	X	P	X	X	X	--
			EB-03BE	--	H	H	H	--	P	P	P	P	--	--	--
			EB-03BN	--	H	H	H	--	P	P	P	P	--	--	--
			EB-03BS	--	H	H	H	--	P	P	P	P	--	--	--
			J07	--	H	H	H	--	P	P	P	P	--	--	--
EB-15 (▲)	2.5'	5,000	EB-15	--	X (2.5')	P (2.5' - 4.5')	P (4.5' - 6.5')	P (6.5-8.5')	P (8.5-10.5')	P (10.5-12.5')	P (12.5-14.5')	P (14.5-16.5')	P (16.5-18.5')	P (18.5-20.5')	P (See Note 5)
			EB-15SE	--	P (1' - 2.5')	P (2.5' - 4.5')	NP	--	--	--	--	--	--	--	--
			O14	X	X	X	X	X	X	X	X	X	X	X	X
			O14E	Sampled as Delineation Location for O14											
			O14S	Sampled as Delineation Location for O14											
G04 (▲)	1'	21	G04NW	P	--	--	--	--	--	--	--	--	--	--	--
H02 / H03 (Δ)	1'	2 / 51	H02W	P	--	--	--	--	--	--	--	--	--	--	--
			H03	X	P (1' - 2'),H (2' - 3')										
			H03NW	P	--	--	--	--	--	--	--	--	--	--	--
			H03SE	P	--	--	--	--	--	--	--	--	--	--	--
			H03SW	P	--	--	--	--	--	--	--	--	--	--	--
H05 / SS-28 (▲) (Δ)	1'	43 / 14.6	H05S	P	--	--	--	--	--	--	--	--	--	--	--
I06 (▲)	9'	310	H06	--	P	P	P	P	P	--	--	--	--	--	--
			I05	P	P	P	P	P	P	--	--	--	--	--	--
			I07	Sampled as Delineation for I08											
			J06	P	P	P	P	P	P	--	--	--	--	--	--
I08 (▲)	11'	120	EB-03BN	Sampled as Delineation for EB-03											
			I07	--	P	P	P	P	P	P	--	--	--	--	--
			I08NW	--	--	--	--	P	P	P	--	--	--	--	--
			J07	Sampled as Delineation for EB-03											
J07 (Δ)	1'	27	K07W	P	--	--	--	--	--	--	--	--	--	--	--
K08 (▲)	3'	1,000	EB-03BS	Sampled as Delineation for EB-03B											
			K08E	--	P	P	--	--	--	--	--	--	--	--	--
			K08S	P	P	P									
			K08SW	P	--	--	--	--	--	--	--	--	--	--	--
			K08W	P	P	P	--	--	--	--	--	--	--	--	--
K16 (▲)	11'	190	K18W	Sampled as Delineation for K18											
			L16	X	--	--	--	P	P	P	--	--	--	P	P (See Note 5)
			L17	X	--	--	--	P	P	P	--	--	--	P	P (See Note 5)
K18 (▲)	12'	150	K18E	--	P	P	P	P	P	P	P	P	P	P	P (See Note 5)
			K18N	--	P	P	P	P	P	P	P	P	P	P	P (See Note 5)
			K18W	--	P	P	P	P	P	P	P	P	P	P	P (See Note 5)
			L18	X	P	P	P	P	P	P	P	P	P	P	P (See Note 5)
L12 / M12 (▲)	3'	140 / 78[110]	L12N	--	P	P	--	--	--	--	--	--	--	--	--
			L12SE	--	P	P	--	--	--	--	--	--	--	--	--
			L12SW	--	P	P	--	--	--	--	--	--	--	--	--
			SS-17	X	P	P	Also See SS-17 for Additional Sampling Details								
L14 (▲)	3'	7,200	L14E	--	P	P	--	--	--	--	--	--	--	--	--
			L14W	--	P	P	Also See SS-21 for Additional Sampling Details								
			M14	X	X	X	X	X	X	X	X	X (16' - 18')	X (18' - 20')	X (20' - 22')	--
L15 (Δ)	1'	290	L15	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			L14E	Sampled as Delineation Location for L14											
			L15E	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			L15S	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
M08 (▲)	1'	57	M08W	P	--	--	--	--	--	--	--	--	--	--	--
			N08	P	--	--	--	--	--	--	--	--	--	--	--
			N09	P	--	--	--	--	--	--	--	--	--	--	--

TABLE 1
PCB DELINEATION SAMPLING - ELM STREET SITE

FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1

GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples											
				0-1'	1-3'	3-5'	5-7'	7-9'	9-11'	11-13'	13-15'	15-17'	17-19'	19-21'	21-23'
M18 (▲)	5'	580	M18N	--	P	P	P	--	--	--	--	--	--	--	--
			M18E	--	P	P	P	--	--	--	--	--	--	--	--
			M18S	--	P	P	P	--	--	--	--	--	--	--	--
			M18W	--	P	P	P	--	--	--	--	--	--	--	--
N18 (Δ)	1'	1.9	N19	P	--	--	--	--	--	--	--	--	--	--	--
O10 (▲)	1'	130	O9	P	--	--	--	--	--	--	--	--	--	--	--
O14 (▲)	17'	150	O14N	--	P	P	P	P	P	P	P	P	P	P	P (See Note 5)
			O14E	--	P	P	P	P	P	P	P	P	P	P	P (See Note 5)
			O14S	--	P	P	P	P	P	P	P	P	P	P	P (See Note 5)
			O14W	--	P	P	P	P	P	P	P	P	P	P	P (See Note 5)
O16 (▲)	9'	190	N16	--	P	P	P	P	P	--	--	--	--	--	--
			O15	--	P	P	P	P	P	--	--	--	--	--	--
			O17	--	P	P	P	P	P	--	--	--	--	--	--
			P16/EB-20A	--	P	P	P	P	P	--	--	--	--	--	--
O18 (▲)	8'	450	N18	--	P	P	P	P (8')	P (8' - 10')	--	--	--	--	--	--
			O18E	P	P	P	P	P (8')	P (8' - 10')	--	--	--	--	--	--
			O17	Sampled as Delineation Location for O16											
			P18	--	P	P	P	P (8')	P (8' - 10')	--	--	--	--	--	--
P17 (Δ)	1'	120	P17	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			P17N	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			P17E	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			P17S	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			P17W	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
Q09 (Δ)	1'	7.6	P09	P	--	--	--	--	--	--	--	--	--	--	--
			Q09W	P	--	--	--	--	--	--	--	--	--	--	--
Q12 (▲)	4'	130	Q12N	--	P	P (4')	P (4' - 6')	--	--	--	--	--	--	--	--
			Q12E	--	P	P (4')	P (4' - 6')	--	--	--	--	--	--	--	--
			Q12S	--	P	P (4')	P (4' - 6')	--	--	--	--	--	--	--	--
			Q12W	--	P	P (4')	P (4' - 6')	--	--	--	--	--	--	--	--
Q14 (▲)	3'	9,100	Q14E	--	P	P	--	--	--	--	--	--	--	--	--
			Q14S	--	P	P	--	--	--	--	--	--	--	--	--
			Q14W	--	P	P	--	--	--	--	--	--	--	--	--
			SS-26	X	P	P	--	--	--	--	--	--	--	--	--
R09 (Δ)	1'	34	R09W	P	--	--	--	--	--	--	--	--	--	--	--
			R09S	P	--	--	--	--	--	--	--	--	--	--	--
			R09SS	H	--	--	--	--	--	--	--	--	--	--	--
R10 (Δ)	1'	9.8	R10S	P	--	--	--	--	--	--	--	--	--	--	--
			S11WW	Sampled as Delineation for S11											
S11 (Δ)	1'	140	S11	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			S11E	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			S11N	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			S11S	P	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			S11SS	H	H	NP	--	--	--	--	--	--	--	--	--
			S11W	P	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			S11WW	H	H	NP	--	--	--	--	--	--	--	--	--
S12 (▲)	1'	110 [92]	S12S	P	--	--	--	--	--	--	--	--	--	--	--
			S12SS	H	--	--	--	--	--	--	--	--	--	--	--
S13 (Δ)	1'	39	S13S	P	--	--	--	--	--	--	--	--	--	--	--
			S13SS	H	--	--	--	--	--	--	--	--	--	--	--
S14 / 2-CS-S04-A(▲)	1'	73 / 111	S14S	P	--	--	--	--	--	--	--	--	--	--	--
			S14SS	H	--	--	--	--	--	--	--	--	--	--	--
SS-15 (Δ)	1'	1,100	O12	X	X	X	X	X	X	X	X	X	X	X	--
			SS-15	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-15E	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-15S	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-15W	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
SS-16 (Δ)	1'	1.97	SS-16NE	P	--	--	--	--	--	--	--	--	--	--	--
			SS-16NW	P	--	--	--	--	--	--	--	--	--	--	--
			SS-16SE	P	--	--	--	--	--	--	--	--	--	--	--
			SS-16SW	P	--	--	--	--	--	--	--	--	--	--	--

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FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1

GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples											
				0-1'	1-3'	3-5'	5-7'	7-9'	9-11'	11-13'	13-15'	15-17'	17-19'	19-21'	21-23'
SS-17 (Δ)	1'	550	M12	X	X	X	X	X	X	X	X	X	X	X	X
			SS-17	X	Sampled as Delineation for M12										
			SS-17E	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-17S	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-17W	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
SS-19 (Δ)	1'	227	SS-19	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-19E	P	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-19S	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-19W	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
SS-20 (Δ)	1'	311	SS-20	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-20S	--	P (3' - 4')	(P 4' - 5', H 5' - 6')	NP	(See Note 4)							
			EB-03BE	Sampled as Delineation for EB-03B											
SS-21 (Δ)	1'	280	SS-21	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			L13	P	--	P (4' - 5')	(P 5' - 6', H 6' - 7')	(See Note 4)							
			L14	X	X	X	X	X	X	--	--	--	--	--	--
			L14W	--	P (See L14)	P (See L14)	(P 5' - 6', H 6' - 7')	(See Note 4)							
SS-25 (Δ)	1'	1.09	SS-25NE	P	--	--	--	--	--	--	--	--	--	--	--
			SS-25NW	P	--	--	--	--	--	--	--	--	--	--	--
			SS-25SE	P	--	--	--	--	--	--	--	--	--	--	--
			SS-25SW	P	--	--	--	--	--	--	--	--	--	--	--
SS-26 (Δ)	1'	1,300	SS-26	X	P (1' - 2'),H (2' - 3')	Also See Q14 for Additional Sampling Details									
			EB-15SE	Sampled as Delineation for EB-15											
			Q14E	Sampled as Delineation for Q14											
			Q14S	Sampled as Delineation for Q14											
			Q14W	Sampled as Delineation for Q14											
SS-27 (Δ)	1'	1.54	E00	P	--	--	--	--	--	--	--	--	--	--	--
			E01	X	--	--	--	--	--	--	--	--	--	--	--
			F00	P	--	--	--	--	--	--	--	--	--	--	--
			F01	P	--	--	--	--	--	--	--	--	--	--	--
SS-38 (Δ)	1'	100	G5	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-38	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-38NE	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-38NW	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
			SS-38SW	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--
T20 (Δ)	1'	2.2	T19	X	--	--	--	--	--	--	--	--	--	--	--
			T20S	P	--	--	--	--	--	--	--	--	--	--	--
			T20SS	H	--	--	--	--	--	--	--	--	--	--	--
			T21	P	--	--	--	--	--	--	--	--	--	--	--
Additional Cemetery Locations Requested by EPA	N/A	N/A	R18E	P	--	--	--	--	--	--	--	--	--	--	--
			R19N	P	--	--	--	--	--	--	--	--	--	--	--
			R20N	P	--	--	--	--	--	--	--	--	--	--	--
			R21N	P	--	--	--	--	--	--	--	--	--	--	--
			R22N	P	--	--	--	--	--	--	--	--	--	--	--

Notes:
1. (Δ) indicates surface samples and (▲) indicates subsurface samples.
2. -- = No sample proposed for this depth increment.
3. Existing soil sample data consists of data collected during EPA's Remedial Investigation, EPA's building demolition activities, or miscellaneous removal actions performed by EPA or GE.
4. The proposed depth of sampling at this location is based upon elevation changes associated with site topography.
5. Samples will be collected to one interval from the top of observed water table. The estimated depth of completion is based upon the depth of the boring subject to delineation.
6. Shaded cells indicate propsed sample revisions in response to USEPA comments made during the March 25, 2004 meeting and EPA's Conditional Approval Letter dated March 31, 2004.
7. NP = Sample that is no longer being proposed, based on comments provided by EPA.

TABLE 2
PCB DELINEATION SAMPLING - MILL STREET SITE

FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1

GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples													
				0-1'	1-3'	3-5'	5-7'	7-9'	9-11'	11-13'	13-15'	15-17'	17-19'	19-21'	21-23'	23-25'	25-27'
B13 (▲)	11'	2.2	B13E	P	--	--	--	NP	NP	NP	--	--	--	--	--	--	--
			B13N	P	--	--	--	NP	NP	NP	--	--	--	--	--	--	--
			B13W	P	--	--	--	NP	NP	NP	--	--	--	--	--	--	--
			C13N	Sampled as Delineation Location for C13													
B17 (▲)	5'	2.7	B17N	P	NP	NP	NP	--	--	--	--	--	--	--	--	--	--
			C17	X	X	X	X	X	X	X	X	X	X	X (20.2')	--	--	--
			C17NE	Sampled as Delineation Location for C17													
			C17NW	Sampled as Delineation Location for C17													
C01 (▲)	25'	9.5	B01	--	--	--	--	--	X	X	X	--	--	--	X	X	X
			C01E	--	--	--	--	--	NP	NP	NP	--	--	--	NP	NP	NP
			C01S	NP													
			C01W	--	--	--	--	--	NP	NP	NP	--	--	--	NP	NP	NP
C05 (▲)	1'	7	C05N	P	--	--	--	--	--	--	--	--	--	--	--	--	--
C06 (▲)	3'	1,500	C06N	--	P	P	--	--	--	--	--	--	--	--	--	--	--
			C06W	--	P	P	--	--	--	--	--	--	--	--	--	--	--
			C07W	Sampled as Delineation Location for C07 & D07													
			D07W	Sampled as Delineation Location for C07 & D07													
C07/D07 (▲)	21.4' / 21'	13 / 1.1	C07E	--	P	P	P	P	P	P	P	P	P	P	P (21.5')	(See Note 4)	
			C07NW	--	--	P	P	P	P	P	P	P	P	P	P	P	(See Notes 4 & 5)
			C07W	--	P	P	P	P	P	P	P	P	P	P	P (21.5')	(See Note 4)	
			D07SE	--	P	P	P	P	P	P	P	P	P	P	P (21.5')	(See Note 4)	
			D07W	--	P	P	P	P	P	P	P	P	P	P	P (21.5')	(See Note 4)	
C08 & C09/MW-22 (▲)	7' / 8'	2.4 / 1.8	C07E	Sampled as Delineation Location for C07 & D07													
			C08N	--	--	P	P	P	P	P	P	(See Notes 5)					
			C09E	--	P	P	P	P (8')	P (8' - 10')	--	--	--	--	--	--	--	--
			D08	X	P	P	P	P (8')	P (8' - 10')	--	--	--	--	--	--	--	--
			D09	--	P	P	P	P (8')	P (8' - 10')	--	--	--	--	--	--	--	--
C11 (▲)	13'	3.7	C11N	--	--	P	P	P	P	P	P	P	P (18')	P (18' - 20')	(See Note 5)		
			C11W	--	P	P	P	P	P	P	P	--	--	--	--	--	--
			C12W	Sampled as Delineation Location for C12													
			D11	X	P	P	P	P	P	P	P	--	--	--	--	--	--
C12/C13/D13 (▲)	19.8' / 18.7' / 23'	1,300 / 12 / 4,300	C12NE	--	--	P	P	P	P	P	P	P	P	P	P	(See Note 4 & 5)	
			C12SW	--	P	P	P	P	P	P	P	P	P	P	P	(See Note 4)	
			C12W	--	P	P	P	P	P	P	P	P	P	P	P	(See Note 4)	
			C13N	--	--	P	P	P	P	P	P	P	P	P	P	(See Note 4 & 5)	
			C13NE	--	--	P	P	P	P	P	P	P	P	P	P	(See Note 4 & 5)	
			D13E	--	P	P	P	P	P	P	P	P	P	P	P	(See Note 4)	
			D13SW	--	P	P	P	P	P	P	P	P	P	P	P	(See Note 4)	
			EB-12	--	X	P	P	P	P	P	P	P	P	P	P	(See Note 4)	
C14 (▲)	15'	1.6	C13NE	Sampled as Delineation Location for C13													
			C14N	P	--	--	--	--	--	NP	NP	NP	--	--	--	--	--
			C14S	--	--	--	--	--	--	P	P	P	--	--	--	--	--
			C15NW	Sampled as Delineation Location for C15													
C15 (▲)	17'	1.1	C15NE	--	--	P	P	P	P	P	P	P	P	--	--	--	--
			C15NW	--	--	P	P	P	P	P	P	P	P	--	--	--	--
			C15SE	--	--	P	P	P	P	P	P	P	P	--	--	--	--
			C15SW	--	--	P	P	P	P	P	P	P	P	--	--	--	--
C17 (▲)	17'	1.5	B17	X	X	X	X	X	X	X	X	X	X	X (19.6')	--	--	--
			C17NE	P	P	P	P	P	P	P	P	P	P	--	--	--	--
			C17NW	--	P	P	P	P	P	P	P	P	P	--	--	--	--
			C17S	--	P	P	P	P	P	P	P	P	P	--	--	--	--
C16 (Δ)	1'	1.4	C16	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
C18 (Δ)	1'	1.4[1.8]	C18	--	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
			C18N	P	--	--	--	--	--	--	--	--	--	--	--	--	--
C20 (Δ)	1'	1.2	C20	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
			C20E	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			C20N	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			C20S	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			C20SE	H	--	--	--	--	--	--	--	--	--	--	--	--	--
			C20SS	H	--	--	--	--	--	--	--	--	--	--	--	--	--

TABLE 2
PCB DELINEATION SAMPLING - MILL STREET SITE

FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1

GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples													
				0-1'	1-3'	3-5'	5-7'	7-9'	9-11'	11-13'	13-15'	15-17'	17-19'	19-21'	21-23'	23-25'	25-27'
D04 (Δ)	1'	1.9	D04	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
			D04NE	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			D04SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
D05 (Δ)	1'	6.5	D05	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
D10 (Δ)	1'	20	D10	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
D15 (Δ)	1'	4,400	D15	Sampled as Delineation Location for E15													
D17 (▲)	1'	3	D17SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
E05 (▲)	5'	7.1	E05N	--	P	P	P	--	--	--	--	--	--	--	--	--	--
			E05E	--	P	P	P	--	--	--	--	--	--	--	--	--	--
			E05S	P	P	P	P	--	--	--	--	--	--	--	--	--	--
			E05W	P	P	P	P	--	--	--	--	--	--	--	--	--	--
E07 / EB-14 (▲)	5' / 6'	1.7 / 20	D07SE	Sampled as Delineation Location for D07													
			E07W	--	P	P	P	--	--	--	--	--	--	--	--	--	--
			EB-14	--	--	X (4' - 6')		P (6' - 8')	NP	X (12' - 16')			--	--	--	--	--
			EB-14SW	--	P	P	P (6')	P (6' - 8')	NP	--	--	--	--	--	--	--	--
			EB-14E	--	P	P	P (6')	P (6' - 8')	NP	--	--	--	--	--	--	--	--
E09 (▲)	3'	33	E09N	--	P	P	--	--	--	--	--	--	--	--	--	--	--
			E09E	--	P	P	--	--	--	--	--	--	--	--	--	--	--
			E09W	--	P	P	--	--	--	--	--	--	--	--	--	--	--
			F09	X	P (1' - 2'),P (2' - 3')	P	--	--	--	--	--	--	--	--	--	--	--
E11 (▲)	5'	3.6	E12	Sampled as Delineation Location for EB-21C													
			EB-13S	Sampled as Delineation Location for EB-13													
			EB-13W	Sampled as Delineation Location for EB-13													
			EB-21CW	Sampled as Delineation Location for EB-21C													
E13 (▲)	13'	2	E13E	--	P	P	P	P	P	P	P	--	--	--	--	--	--
			E13S	P	P (1' - 2'),P (2' - 3')	P	P	P	P	P	P	--	--	--	--	--	--
			E13SS	P	P (1' - 2'),P (2' - 3')	H	H	H	H	H	H	--	--	--	--	--	--
			E13W	--	P	P	P	P	P	P	P	--	--	--	--	--	--
			EB-12	Sampled as Delineation Location for D13													
E14 / SF-03G-1 / SF-02G-1 (Δ)	1'	1,500 / 20.2 / 1,100	E14S	--	NP	NP	--	--	--	--	--	--	--	--	--	--	--
			E14SE	P	P (1' - 2'),P (2' - 3')	--	--	--	--	--	--	--	--	--	--	--	--
			E14SW	P	P (1' - 2'),P (2' - 3')	--	--	--	--	--	--	--	--	--	--	--	--
E15 (▲)	3'	64	D15	X	P	P	--	--	--	--	--	--	--	--	--	--	--
			E15S	*P*	*H*	*H*	--	--	--	--	--	--	--	--	--	--	--
			EB-07A	--	P	P (4')	X (4' - 5.5')	--	--	--	--	--	--	--	--	--	--
			SS-12 (ERE)	X	P	P	--	--	--	--	--	--	--	--	--	--	--
			SF-01G	X	P	P	--	--	--	--	--	--	--	--	--	--	--
EB-12 (▲)	3'	26,700	D13E	Sampled as Delineation Location for D13													
			D13SW	Sampled as Delineation Location for D13													
			E13E	Sampled as Delineation Location for E13													
			E13W	Sampled as Delineation Location for E13													
			EB-12	Sampled as Delineation Location for D13													
EB-13 (▲)	16.5'	1.4	E11	X	X	X	X	X	X	X	X	X	X	21.8'	--	--	
			EB-13	--	*P*	*P*	*X*	*X (8.5')*	*P*	*P*	*P*	*X (16.5')*	*P (16.5' - 18.5')*		*H (18.5' - 20.5')*		--
			EB-13S	P	P	P	P	P	P	P	P	P (16.5')	P (16.5' - 18.5')		H (18.5' - 20.5')		--
			EB-13SS	P	H	H	H	H	H	H	H	H (16.5')	H (16.5' - 18.5')		H (18.5' - 20.5')		--
			SF-05G-1	X	P	P	P	P	P	P	P	P (16.5')	P (16.5' - 18.5')		H (18.5' - 20.5')		--
EB-21C (▲)	14'	190	C12SW	Sampled as Delineation Location for C12													
			D13SW	Sampled as Delineation Location for D13													
			E12	X	P	P (4')	P (4' - 6')	P (6' - 8')	P (8' - 10')	P (10' - 12')	P (12' - 14')	P (14' - 16')	H (16' - 18')	H (18' - 20')	H (20' - 22')	H (22' - 24')	H (24' - 26')
			EB-21C	X	X	X (4')	P (4' - 6')	P (6' - 8')	X (8' - 10')	P (10' - 12')	X (12' - 14')	P (14' - 16')	H (16' - 18')	H (18' - 20')	H (20' - 22')	H (22' - 24')	H (24' - 26')
			EB-21CW	--	P	P (4')	P (4' - 6')	P (6' - 8')	P (8' - 10')	P (10' - 12')	P (12' - 14')	P (14' - 16')	H (16' - 18')	H (18' - 20')	H (20' - 22')	H (22' - 24')	H (24' - 26')
F06 (Δ)	1'	7.8	F06	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
			F06SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
F07 (▲)	1'	6.4	F07SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
F08 (Δ)	1'	18	F08	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
			F08SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
F09 (Δ)	1'	17	F09	X	P (1' - 2'),P (2' - 3')	P	Also see E09 for additional sampling details.										
			F09SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--

TABLE 2
PCB DELINEATION SAMPLING - MILL STREET SITE

FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE OPERABLE UNIT 1

GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

Sample Location	Maximum Depth of Criteria Exceedance	Corresponding PCB Concentration (ppm)	Delineation Locations	Existing (X), Proposed (P), and Sample & Hold (H) Delineation Samples													
				0-1'	1-3'	3-5'	5-7'	7-9'	9-11'	11-13'	13-15'	15-17'	17-19'	19-21'	21-23'	23-25'	25-27'
F10 (Δ)	1'	61	F10	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
			F10SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
SF-04G-1 (Δ)	1'	3.2	SF-04G-1	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
			SF-04G-1SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
SS-05 (Δ)	1'	19	SS-05	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
SS-12 (ERE) (Δ)	1'	130	SS-12 (ERE)	X	P (1' - 2'),H (2' - 3')	--	--	--	--	--	--	--	--	--	--	--	--
			E16	P	--	--	--	--	--	--	--	--	--	--	--	--	--
SS-12 (Δ)	1'	6.29	SS-12	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
			SS-12E	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			SS-12S	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			SS-12SE	H	--	--	--	--	--	--	--	--	--	--	--	--	--
SS-13 (Δ)	1'	7.6	E03	X	--	--	--	--	--	--	--	--	--	--	--	--	--
			SS-13	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--
			SS-13NE	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			SS-13SE	P	--	--	--	--	--	--	--	--	--	--	--	--	--
			SS-13SW	P	--	--	--	--	--	--	--	--	--	--	--	--	--
SS-14 (Δ)	1'	20.8	SS-14	X	P (1' - 2'),H (2' - 3')	NP	--	--	--	--	--	--	--	--	--	--	--

Notes:
1. (Δ) indicates surface samples and (▲) indicates subsurface samples.
2. -- = No sample proposed for this depth increment.
3. Existing soil sample data consists of data collected during EPA's Remedial Investigation or miscellaneous removal actions performed by EPA or GE.
4. Continuous soil sampling will be performed to bedrock at this location. The estimated depth of completion is based upon the depth of the boring subject to delineation.
5. The proposed depth of sampling at this location is based upon the elevation change associated with the elevated railbed.
6. Shaded cells indicate propsed sample revisions in response to USEPA comments made during the March 25, 2004 meeting and EPA's Conditional Approval Letter dated March 31, 2004.
7. NP = Sample that is no longer being proposed, based on comments provided by EPA.

Draft for EPA Review

EPA Letter Approving Subsurface Delineation Sampling Proposal for Mill Street Area dated June 14, 2004

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

June 14, 2004

Mr. Lewis Streeter
General Electric Company
320 Great Oaks Office Park
Suite 323
Albany, NY 12203

Re: Fletcher's Paint Site, Milford, NH

Dear Mr. Streeter:

Following the March 25, 2004 meeting where EPA discussed our position relative to GE's proposed soil boring program, and EPA's March 31, 2004 letter granting conditional approval of certain field activities, GE has submitted several figures with the additional data, and proposed subsequent soil boring locations. EPA asked for and received in a May 20th transmittal, additional copies of the latest data set, the proposed soil boring locations along with the grid lines on the figures (previous set did not have grid lines).

The Pre-Design Work Plan laid out a sampling program with 25 foot grid lines for surface soil samples and a 50 foot grid for subsurface soil sampling, along with a step in/step out logic process for subsequent sampling. The step in /step out process essentially included a decision making diagram whereby subsequent samples would be taken either by stepping in ½ grid spacing or stepping out to the next grid location.

The proposal from BBL did not follow the step in/step out process outlined in Figure 6 of the PDI Work Plan. BBL's proposal appears to present a program whereby each previous sample is surrounded with up to 4 proposed borings, at approximately a 5 foot grid interval, typically in the four directions around the previous boring. EPA had initially indicated to GE that this process was not acceptable, it did not follow the approved step in/out thought process and appeared to present an abundant soil boring program, which would result in a boring being taken every 5 feet across the site. EPA believes that the size of the site areas, the primary contaminant being PCBs, the relative lack of contamination at distances away from the primary site area, do not warrant, for the purposes of excavation design, such an extensive soil boring proposal as presented in the BBL figures. EPA has indicated to GE that the PDI data will not, in most instances, eliminate the need for post-excavation sampling at the site.

Since BBL has chosen to present a proposal which varies off of the grid delineation process approved in the Work Plan, making the review difficult, EPA will limit its written approval in

this letter to the Mill Street area. A similar letter will follow for the Elm Street area and also for the extension of the PDI report submittal.

As such, this letter serves to initiate GE into the field for the final phase of soil boring explorations as part of the Pre-Design Investigations and approves the following activities at the Mill Street as proposed in the BBL figures or requires the taking of certain samples as specified below.

EPA approves the taking of borings proposed on BBL's April 2, 2004 Mill Street Figure (sent in a May 20th transmittal letter) at the following **grid locations**:

C-18
D-18 (SS-12 to 3 feet)
E-16
C-13
C-12
C-11 - to rock
C-I0 to 15 feet (takes the place of the I0 foot/15 foot borings located east/west of C-10)
C-8 to rock
C - between 6 and 7
Between C and D - 6
E-16
E-15
D-15
E-14
E-12
EB-13
E-9
D-14
EB-12
EB-21C to rock
EB-07A
D-11 to rock
Between C/D - 8
EB-14
D-8
D-5

Additional samples shall be taken at the following grid locations:

B-17: 0-1 foot and 1-2 foot sampled and analyzed
B-18: 0-1 foot and 1-2 foot sampled and analyzed
B-19: 0-1 foot and 1-2 foot sampled and analyzed
B-20: 0-1 foot and 1-2 foot sampled and analyzed
B-21: 0-1 foot and 1-2 foot sampled and analyzed

D-4/5: MSSS-D04SW - 0-1 foot had 14 ppb PCB; take 1-2 foot and 2-3 foot sample and analyze

EPA's approval of the above grid locations was based on the review of the data submitted by BBL, proximity to additional data points, and land position. This additional soil boring data shall be collected and incorporated with the previous data and included into the Pre-Design Investigation Report. Should GE believe it remain necessary to take additional boring information, above and beyond the data collected to date and required to be collected as outlined above, then GE may do so at their convenience, following the collection of the required data. The taking of such additional samples by GE will not delay the final submission date for the Pre-Design Investigation. The final submission date for the PDI report will be presented in a separate letter.

GE shall initiate these approved field actions no later than 15 days from receipt of this letter. If you have any questions, please call me at 617, 918-1244.

Sincerely,

Cheryl L. Sprague
Office of Site Remediation and Restoration
One Congress Street
Boston, MA 02114

cc: Tom Andrews, NHDES
Scott Acone, US ACE
Katie Chambers, Milford
Tom Roy, Aries
John Beling, EPA
Corey Averill, BBL

Draft for EPA Review

EPA Letter Approving Subsurface Delineation Sampling Proposal for Elm Street Area dated July 16, 2004

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engineers, scientists, economists

July 16, 2004

Mr. Lewis Streeter
General Electric Company
320 Great Oaks Blvd.
Suite 323
Albany, NY 12203

Re: Elm Street Borings

Dear Mr. Streeter:

As part of these ongoing PDI investigations, forty-four (44) subsurface borings have been installed to date at the Elm Street area of the site (according to the maps made available to the EPA). EPA approved these actions through the approval of the Pre-Design Work Plan, and as modified in letters dated November 26, 2003, March 12, 2004, and March 31, 2004. Field work for the Pre-Design Investigations were initiated on May 16, 2003.

In March 2004, and as revised in April 2004, GE requested the approval to proceed with an additional 87 borings at the Elm Street area, the vast majority of which are all located within the site proper boundaries. EPA approved GE's original request to perform subsurface delineation sampling along a 50 foot grid. EPA also approved a step in /step out decision tree , as part of the PDI Work Plan, for further delineation on the extent of soil contamination requiring remediation.

As EPA indicated in it's June 14, 2004 letter regarding the Mill Street area of the site, EPA does not believe that GE has followed the approved step in/step out process or intent for further delineation characterization. Specifically, a large portion of the borings collected to date (30 out of the 44) indicate that the border of the Elm Street property along Keyes Drive, along Elm Street and at the edges of the property bordering the river, do not have exceedances above the subsurface soil cleanup levels. The step in /step out diagram in the PDI Work Plan indicates that if a soil sample exceeds the soil cleanup level by an order of magnitude or greater, then the next location would step out 50 feet for subsurface sampling, if the exceedance is not greater than an order of magnitude then a step in of 25 feet would occur. GE's 87 proposed new boring locations have been proposed at locations approximately 10-15 feet from existing data locations, which exceed the soil cleanup levels, except where noted below as a result of the March 2004 discussions. These proposed revisions included the following:

<u>Elm Street</u>

- The depth of sample collection and analysis for all proposed delineation soil borings was extended to one interval below the deepest exceedance. For example, soil boring Q12 has an exceedance of the subsurface soil cleanup level (SCL) at 4 feet below grade. Therefore, the depth of completion for the delineation soil borings associated with soil boring Q12 is listed as 6 feet below grade.
- A soil boring was added to location H03. Samples will be collected from the 1- to 2-foot and 2- to 3-foot depth intervals at this location. However, the sample from the 2- to 3-foot depth interval will be held for analysis pending the results of the sample collected from the 1- to 2-foot depth interval.
- Delineation soil borings were added around certain locations where the detected PCB concentration in surface soils was greater than the subsurface SCL of 100 ppm. These locations include: L15, P17, S11, SS-15, SS-17, SS-19, SS-20, SS-21, and SS-38.
- The proposed depth of sample collection and analysis at the delineation soil borings for K16, K18, and EB-15/O14 were extended to one interval below the observed water table.
- The proposed depth of sample collection and analysis at the delineation soil borings for EB-03 were extended to 17 feet below grade.
- The proposed delineation soil borings to the east of locations K18, M18, and O18 were all relocated approximately 10 feet to the east.
- Certain soil borings (e.g., I08, K16, Q16, etc.) have isolated exceedances of the subsurface SCL. In the delineation soil borings for such locations, GE/BBL is proposing to collect and analyze soil samples from the depth intervals above, at, and below the exceedance. As requested by EPA, the color of such soil borings has been changed for easier identification.
- BBL has increased the spacing of the proposed delineation soil borings in three areas of the site. To the extent that site conditions and existing data permit, the revised borings were located on an approximate 25' spacing from the sample requiring delineation (i.e., at intermediate grid nodes). As a result, certain delineation soil borings for adjacent sample locations were combined. The three areas in question are as follows (sample IDs represent borings with exceedances):

  I06/I08/EB-03
  14/O16/O18

  K16/K18

During the discussions held between GE and the EPA from March through July of 2004, EPA has made its position clear that we did not approve of the GE proposal as submitted and that GE's proposal would allow for continuous field data collection, above and beyond what EPA would deem necessary for the design of an excavation program, and thereby extensively extend the PDI completion. EPA's position is also that any further discussions relative to the exact points of data collection, after having already provided an approval on the process would appear

to also delay these investigations. EPA has granted approval of the Mill Street actions, which granted approval of certain sampling locations but also allowed GE to continue to take samples which EPA, upon review of the data, did not deem necessary for delineation, as long as the collection of the data did not delay the overall schedule.

For the Elm Street Site EPA will enclose it's comment on GE's proposed boring program, and recommend that GE take action to meet the intent of the comments which EPA has provided. EPA appreciates the additional proposed depths and locations based on past discussions, and EPA's comments and concerns relative to data gaps.

It is EPA's understanding that the Mill Street boring program was completed, as approved by the EPA, and that on Monday, July 19th GE will initiate any remaining Mill Street actions it deems necessary. EPA does not wish to further delay the conclusion of the site work for the PDI investigations and therefore will not be commenting or approving of boring locations as such but rather in an attempt to gain completion of the these PDI Investigations, hereby grants approval for GE to collect the data as they have proposed for the Elm Street Site, or as they modify such that the data collection, data evaluation and data presentation are completed and submitted as part of the Pre-Design Report which will be due 6 months from the date of this letter, or December 16, 2004. Please refer to the Order and the SOW for the requirements of the submission for the Pre-Design Report.

The following comments are offered from the U.S EPA and USACE on General Electric's (GE) Proposed Pre-Design Elm Street Subsurface Step Out Plan.

1. General - Despite the discussion that occured during the March 25th meeting, the plan still seems to approach the step out borings as delineation of individual hot spots located throughout the Site. The current understanding of the Site, as documented in the Remedial Investigation/Feasibility Study (RI/FS), is that the greater part of the Site contains widespread PCB contamination. Attempts to identify individual hotspots defies the Conceptual Model which is backed up with data from the RI/FS.

2. Riverbank Characterization - EPA retains concerns over the lack of subsurface investigations on the river bank. EPA's March 31st, 2004 letter documents that the design assumption will be to excavate horizontally towards the river at the same elevation as the closest boring into the Site that was determined to be clean. EPA may require sampling of the floor of the excavation as necessary to ensure that the PCB's have not migrated vertically between the Site boring and the river bank.

3. GE has not documented that with their proposed identification of hotspots within the Site, and based on the characterization of the Site performed to date, any confirmation that "clean" borings within the generally contaminated center of the Site actually represent larger areas and aren't just artifacts of matrix and contaminant variability.

4. GE's proposed plan of stepping out with these closer borings around contaminated borings, then, reviewing that data and stepping out yet again until a "clean" boundary is incrementally defined will result in many additional months of pre-design investigations. Based on the US ACE's past experience, it is not evident that this plan will result in moving towards designing an excavation plan in the next year. If GE had wanted a tighter delineation of the sampling points, GE should have proposed a tighter grid in the original work Plan, which would have allowed for timely collection of all the data they believe is needed to support the excavation design objectives.

5. EPA remains concerned that GE continually suggests that this pre-design investigation will yield an excavation program that requires no confirmatory sampling. The Order/SOW include confirmation sampling as part of the confirmation of cleanup at this site. The uncertainty associated with discrete samples at depth from a boring program is far greater than what's possible when sampling excavation floors and walls. This increased uncertainty will make it difficult to close the Site from a soil-remedy cleanup perspective due to the difficulties in developing statistical confidence from a limited data set. Confirmatory sampling shall be part of any cleanup design proposed by GE, as required in the Order/SOW.

EPA will continue to be involved with the site meetings thru site visits and call ins, as they occur.

EPA will make arrangements for the meeting requested by GE, should GE still wish to meet to discuss the soil boring programs at the site.

Please call me at (617) 918-1244 is you have any questions regarding this letter.

Sincerely,

Cheryl L. Sprague
Remedial Project Manager
Office of Site Remediation and Restoration

cc: Tom Andrews, NHDES
Mike Jasinski, EPA
Scott Acone, ACE
Katie Chambers, Milford
Tom Roy, Aries
John Beling, EPA
Corey Averill, BBL
Bonnie Harrington, GE

Appendix B

Appendix B

Weekly Status Meeting Minutes

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Draft for EPA Review

2003 Meeting Minutes

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Fletcher's Paint Works and Storage Facility Superfund Site
Phase 1 Pre-Design Investigation Project Status Update
July 2, 2003 Conference Call Minutes

July 2, 2003 Project Status Update Call – Discussion leader(s) for each topic identified in parentheses.

1. Participants:

    - BBL: Corey Averill (Project Manager), Lowell McBurney (Project Officer), Dan Servetas (Field Team Leader)
    - EPA: Cheryl Sprague (EPA Project Manager)
    - USACE: Scott Acone (USACE Project Manager)

2. Purpose of Call (BBL): During his absence, Lew Streeter (GE Project Manager) recommended to hold two project status calls (July 2 and 9, 2003) for the purpose of providing project status updates with respect to pre-mobilization activities performed at the Site.

3. Summary of Tasks Performed to Date (BBL):

    - Inventory of drums containing investigation-derived waste (IDW) was completed on July 2. The results of that inventory are presented below:

        - 95 total drums on site
        - 44 contain soil
        - 25 contain soil and liquid
        - 8 contain liquid
        - 5 contain personal protective equipment (PPE)
        - 11 are empty
        - 2 contain used absorbent booms/pads

    - Initiation of fence installation for the support zone in Keyes Park. DigSafe is performing their utility clearance activities, which will enable us to complete fencing installation next week.
    - All companies supplying utilities for the support zone have been contacted (electrical, telephone, etc.).

4. Summary of Near-Term Tasks (BBL):

    - Characterization sampling for the drum contents. Upon receipt of the laboratory analytical data for these samples, the drums and their contents will be sent to an appropriate off-site disposal facility (it is anticipated this will occur during the week of July 14).
    - Delivery of site office and equipment trailers to Site.
    - Fence installation around support zone, including trailers.
    - Utility connections - Follow-up calls will be performed this and/or next week once the trailer has been placed in the support zone.
    - Initiate access notifications for adjacent property owners subject to Phase I investigation activities

5. What Town Residents Can Expect to See (BBL):

    - Personnel performing site preparation, mobilization and/or survey activities will be in and around the site.
    - These people will be wearing "Level D" clothing which consists of normal working attire (steel-toed boots, hard hats, safety glasses and/or gloves) as warranted by the activities which they are performing.
    - Personnel performing invasive sample collection activities will be clothed in "modified Level D" attire which includes the aforementioned items plus tyvek suits, rubber booties, nitrile gloves and/or splash guards as appropriate.

6. Schedule for Future Project Status Meetings (BBL):

    - Next project status update call scheduled for July 9.
    - Phase I project kickoff meeting at Site scheduled for July 11.

7. Other Miscellaneous Topics (Miscellaneous):

    - Draft versions of the schedule for the Phase 1 pre-design investigation activities at the Site were distributed via e-mail to EPA, USACE, NHDES, and the Town of Milford.
    - Cheryl indicated that EPA had begun their review of the Revised Sampling and Analysis Plan – Quality Assurance Project Plan and had identified an issue related to the STL Buffalo's (the analytical laboratory for the pre-design investigation activities) practical quantitation limits for certain. It was agreed that a separate call would be conducted with Andy Beliveau (EPA) to go over this issue in more detail.
    - EPA mentioned that jersey barrier(s) had fallen into the drainage ditch next to the Mill Street Site and that moving such barriers might assist with access negotiations for the property owned by Ms. Antoinette Sprague (certain monitoring wells are located on her property).

Fletcher's Paint Works and Storage Facility Superfund Site
Phase 1 Pre-Design Investigation Project Status Update
July 9, 2003 Conference Call Minutes

July 9, 2003 Project Status Update Call – Discussion leader(s) for each topic identified in parentheses.

1. Participants:

    - BBL: Corey Averill (Project Manager), Lowell McBurney (Project Officer)
    - EPA: Cheryl Sprague (EPA Project Manager)
    - USACE: Scott Acone (USACE Project Manager)
    - Town of Milford: Katie Chambers (Town Administrator)

2. Summary of Performed During Previous Week (BBL):

    - Waste characterization sampling of drums containing investigation-derived waste (IDW) was completed on July 3.
    - Delivery of office and equipment trailers to the site was performed on July 3.
    - All companies supplying utilities for the support zone have been contacted (electrical, telephone, etc.).

3. Summary of Near-Term Tasks (BBL):

    - Fence installation around support zone, including trailers.
    - Utility connections - Follow-up calls will be performed this and/or next week.
    - Initiate access notifications for adjacent property owners subject to Phase I investigation activities.

4. Schedule for Future Project Status Meetings (BBL):

    - Conference call participants agreed to postpone the Phase I project kickoff meeting at the Site until July 16.

Fletcher's Paint Works and Storage Facility Superfund Site
Phase 1 Pre-Design Investigation Kickoff Meeting
July 16, 2003 Meeting Minutes

July 16, 2003 Phase I Pre-Design Investigation Kickoff Meeting – Discussion leader(s) for each topic identified in parentheses.

1 PM – Site Trailer (Keyes Park)

1. Introductions:

    - Meet & Greet Attendees
    - GE: Lew Streeter (Project Manager)
    - BBL: Corey Averill (Project Manager), Christine Vooris (Field Engineer), Tom O'Rourke (Survey)
    - Marcor: Mark Thompson (Project Manager)
    - EPA: Cheryl Sprague (EPA Project Manager)
    - USACE: Scott Acone (USACE Project Manager)
    - Town of Milford: Katie Chambers (Town Administrator)

2. General Schedule/Agenda Discussion - BBL distributed Agenda.

3. Summary of Tasks Performed to Date (BBL):

    - Between July 2 and 3, 95 drums inventoried and sampled for waste characterization, including:
        - 44 soil;
        - 25 soil & liquid;
        - 8 liquid;
        - 5 personal protective equipment (PPE);
        - 11 empty;
        - 2 absorbent pads/booms
    - Office and equipment storage trailers delivered to site on July 3.
    - Support zone fence installation performed on July 10.
    - Access notifications for adjacent property owners subject to Phase I investigation activities initiated.
    - Utility orders placed.
    - Initiated Site clearing activities.

4. Summary of Near- Term Tasks/Review of Phase I Schedule (BBL):

    - Week of July 14 (Remainder)

        - Continue Site Clearing
        - Installation of Erosion Controls
        - Consolidation (Bulking) of Drum Contents for Off-Site Disposal
        - Initial Site Survey Activities
        - July 18 (No work scheduled to accommodate swim meet)

4. Summary of Near- Term Tasks/Review of Phase I Schedule (BBL) (continued):

   - Week of July 21
     - Continue Site Clearing
     - Continue Site Survey Activities
     - Initiate MW Survey
     - Remove Consolidated Drum Contents
   - Week of July 28
     - Complete Site Survey
     - Continue MW Survey
     - Initiate Geophysical Survey
   - Week of August 4
     - Complete Geophysical Survey
     - Initiate Traffic Survey
   - Week of August 11
     - Complete Traffic Survey
     - Complete UST Characterization
   - Complete Phase I Pre-Design Investigation Activities on August 15

5. What Town Residents Can Expect to See (BBL):

   - Personnel performing site preparation, mobilization and/or survey activities will be in and around the site.
   - These people will be wearing "Level D" clothing which consists of normal working attire (steel-toed boots, hard hats, safety glasses and/or gloves) as warranted by the activities which they are performing.
   - Personnel performing invasive sample collection activities will be clothed in "modified Level D" attire which includes the aforementioned items plus tyvek suits, rubber booties, nitrile gloves and/or splash guards as appropriate.

6. Schedule for Future Project Status Meetings (BBL):

   - Meeting participants agreed to hold future project status update meetings/conference calls on each Thursday for the duration of active on-site operations.

7. Status of Public Fact Sheet (EPA):

   - Cheryl indicated that EPA has not yet completed the Public Fact Sheet. EPA intends to provide a draft copy of the Public Fact Sheet to GE prior for review/comment.

8. Agency Review/Comments to Work Plans (EPA):

    - Cheryl indicated that EPA is in the process of reviewing the revised plans and compiling comments.
    - EPA issued draft comments for the Revised Sampling and Analysis Plan on July 10, 2003. BBL and EPA conducted a conference call on July 10, 2003 to discuss EPA's draft comments.
    - An additional discussion was held following the meeting between EPA, USACE, GE, and BBL regarding EPA's draft comments on validation, laboratory protocols, etc.

9. Schedule for Phase 2 Pre-Design Activities (BBL):

    - Phase 2 Pre-Design investigation activities will begin at the completion of Phase 1 investigation activities, subject to receipt and incorporation of EPA comments and issuance of the final plans to EPA.

10. Other Miscellaneous Topics (Miscellaneous):

    - EPA mentioned that jersey barrier(s) had fallen into the drainage ditch next to the Mill Street Site and that moving such barriers might assist with access negotiations for the property owned by Ms. Antoinette Sprague (certain monitoring wells are located on her property).
    - The following dates were identified by the Town of Milford as dates to minimize/cease activities at the Site:

        - July 18, 2003 – Town of Milford swim meet at the Keyes Park pool
        - August 24, 2003 – First day of school

    - GE/BBL reiterated willingness/flexibility of schedule with respect to Town of Milford activities.

Fletcher's Paint Works and Storage Facility Superfund Site
Phase I Pre-Design Investigation Project Status Update
July 24, 2003 Meeting Minutes

10 AM – Site Trailer (Keyes Park) – Discussion leader(s) for each topic identified in parentheses.

1. Participants:

    - GE: Lew Streeter (Project Manager)
    - BBL: Dan Servetas (Field Team Leader)
    - EPA: Mike Jasinski (EPA NH/RI Remediation Chief), Cheryl Sprague (EPA Project Manager)
    - NHDES: Tom Andrews (NHDES Project Manager)
    - Town of Milford: Katie Chambers (Town Administrator), Bill Ruoff (Director of Public Works Department)

2. General Schedule/Agenda Discussion (BBL):

3. Summary of Tasks Performed During Previous Week (BBL):

    - Continued/completed access notifications
    - Utility orders:
        - Phone/fax established
            - (603) 249-1695 (Line 1)
            - (603) 249-1696 (Line 2)
            - (603) 249-1697 (fax)
        - Electrical – Awaiting Inspection (Note: Inspection performed and PSNH installed meter and completed drop on afternoon of July 24)
        - Sanitary – Delivered to Site
        - Drinking Water – Delivered to Site
    - Completed site clearing at Mill and Elm Street Sites – minor additional clearing activities ongoing along river bank adjacent to Elm Street Site
    - Completed erosion control repair/installation
    - Completed consolidation of drum contents – liquids off-site on 7/23, solids off-site on 7/24
    - Continued Site Survey – sample locations and geophysics grid completed at Mill Street Site, sample locations and geophysics grid ongoing at Elm Street Site
    - Completed MW Survey on 7/23, BBL compiling results

4. Summary of Near-Term Tasks (BBL):

    - Week of July 21 (Remainder)

        - Complete Site Clearing
        - Continue Site Survey Activities

    - Week of July 28

        - Continue Site Survey
        - Initiate Geophysical Survey

Fletcher's Paint Works and Storage Facility Superfund Site
Phase I Pre-Design Investigation Project Status Update
July 24, 2003 Meeting Minutes

4. Summary of Near-Term Tasks (BBL) (continued):

    - Week of August 4

        - Complete Geophysical Survey
        - Complete Site Survey
        - Initiate Traffic Survey

    - Week of August 11

        - Complete Traffic Survey
        - Complete UST Characterization

    - Complete Phase I Pre-Design Investigation Activities on August 15

5. Schedule for Future Project Status Meetings (BBL):

    - All participants agreed to continue meeting at the site trailer on Thursdays at 10:00 to discuss weekly progress (call-in number 866-606-4717, access code 7486861 available for those unable to physically attend).

6. Update on status of Public Fact Sheet (EPA):

    - A draft Public Fact Sheet has been prepared and a copy provided to GE for review. After draft has been finalized (formatted), EPA will distribute via mailing list and walk-around through adjacent neighborhoods.

7. Update on Status of Agency Review/Comments to Work Plans – Schedule for Phase 2 Pre-Design Activities (EPA):

    - Comments from EPA are expected to be delivered to GE during the week of August 4, 2003.
    - Comments from EPA will include those from NHDES and Town of Milford.
    - Issues regarding the QAPP are likely to be the only major ones. EPA believes that other issues can be resolved over a conference call.

8. Other Miscellaneous Topics/Questions and Answers -- Identified items will remain on list until resolved (Miscellaneous):

    - Town of Milford requests a meeting with the Town (Police, Fire, and schools) during the 2nd or 3rd week of August to discuss Phase II schedule. Keyes Park is used by the High School during the fall.
    - EPA requested that the "void" near the corner of the fence at the Elm Street site be filled. This void was filled on the afternoon of July 24, 2003.

8. Other Miscellaneous Topics/Questions and Answers -- Identified items will remain on list until resolved (Miscellaneous) (continued):

    - EPA informed GE that samples obtained from area of the former driveway between the former buildings at the Elm Street Site exhibited "low" hits of PCBs. These data were reported in USACE demolition reports.

Fletcher's Paint Works and Storage Facility Superfund Site
Phase I Pre-Design Investigation Project Status Update
July 31, 2003 Conference Call Minutes

<u>10 AM – Site Trailer (Keyes Park)</u> – Discussion leader(s) for each topic identified in parentheses.

1. Participants:

    - GE: Lew Streeter (Project Manager)
    - BBL: Corey Averill (Project Manager)
    - Cheryl Sprague (EPA Project Manager)
    - Town of Milford: Katie Chambers (Town Administrator)

    - Tom Andrews (NHDES) spoke with Corey Averill by phone following the conference call and received a project status update.

2. Summary of Tasks Performed During Previous Week (BBL, with comments by others):

    - Utility orders:
        - Electrical – Awaiting Inspection (Note: Inspection performed and PSNH installed meter and completed drop on afternoon of July 24)
    - Completed minor additional clearing activities along river bank adjacent to Elm Street Site
    - Completed consolidation of drum contents – liquids off-site on 7/23, solids off-site on 7/24
    - Continued Site Survey – sample locations and geophysics grid completed at Mill Street Site, sample locations and geophysics grid ongoing at Elm Street Site
    - Completed MW Survey – Preliminary Findings as follows:
        - Five wells not located, including: MW-5B (Keyes Park), MW-20A (under cap for former building) Mobil-01, NHDES-1 and NHDES-2 (upgradient wells)
        - Several wells in varying states of disrepair: J-plugs missing, curb boxes damaged/leaking, need redevelopment (sediment in bottom), obstructions in wells, etc.
        - BBL is preparing a summary document/table detailing findings/proposed repairs, etc.
    - EPA requested that the "void" near the corner of the fence at the Elm Street site be filled. This was completed on July 24.

3. Summary of Near-Term Tasks (BBL):

    - Week of July 28

        - Continue Site Survey
        - Continue Geophysical Survey

Fletcher's Paint Works and Storage Facility Superfund Site
Phase I Pre-Design Investigation Project Status Update
July 31, 2003 Conference Call Minutes

3. Summary of Near-Term Tasks (BBL) (continued):

    - Week of August 4

        - Complete Geophysical Survey
        - Complete Site Survey
        - Initiate Traffic Survey (if necessary)

    - Week of August 11

        - Complete Traffic Survey (if necessary)
        - Complete UST Characterization

    - Complete Phase I Pre-Design Investigation Activities on August 15

4. Schedule for Future Project Status Meetings (BBL):

    - All participants agreed to continue meeting at the site trailer on Thursdays at 10:00 to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend).

5. Public Fact Sheet status (EPA):

    - A draft Public Fact Sheet has been prepared and a copy provided to GE for review. After draft has been finalized (formatted), EPA will distribute via mailing list and walk-around through adjacent neighborhoods.

6. Update on Status of Agency Review/Comments to Work Plans - Schedule for Phase 2 Pre-Design Activities (EPA):

    - Comments from EPA are expected to be delivered to GE during the week of August 4, 2003. Comments from EPA will include those from NHDES and Town of Milford. Issues regarding the QAPP are likely to be the only major items requiring resolution. EPA believes that other issues can be resolved over a conference call.

7. Other Miscellaneous Topics/Questions and Answers -- Identified items will remain on list until resolved (Miscellaneous):

    - Town of Milford requests a meeting with the Town (Police, Fire, and Superintendent of Schools) during the 2nd or 3rd week of August to discuss Phase II schedule.
    - EPA informed GE that samples obtained from area of the former driveway between the former buildings at the Elm Street Site exhibited "low" hits of PCBs. These data were reported in USACE demolition reports. GE/BBL have requested copies of this report from USACE.

Fletcher's Paint Works and Storage Facility Superfund Site
Phase I Pre-Design Investigation Project Status Update
August 7, 2003 Conference Call Minutes

<u>10 AM – Conference Call</u> – Discussion leader(s) for each topic identified in parentheses.

1. Participants:

    - BBL - Lowell McBurney, Corey Averill, Dan Servetas
    - GE - Lew Streeter
    - NHDES - Tom Andrews

    - EPA - Cheryl Sprague called Corey Averill immediately after the conference call to receive a project update/provide feedback with respect to EPA comments to revised plans.

2. Health and Safety Update (BBL): No issues last week, zero lost time accidents to date.

3. Summary of Tasks Performed During Previous Week (BBL):

    - Continued Site Survey (Topography)
    - Initiated Geophysical Survey

        - Electromagnetic (EM) and ground penetrating radar (GPR) survey data being compiled/reviewed.
        - All three USTs located and staked out for UST characterization during week of August 11.
        - MW-20A located under cap over building footprint was not located during performance of the monitoring well survey. Therefore, it was looked for during performance of the geophysical investigations. MW-20A was not identified during performance of the geophysical investigations (only scrap metal was identified).
        - Two anomalies preliminarily identified during EM/GPR surveys (upon further review of data, additional GPR activities may be conducted during week of August 11).

4. Summary of Near-Term Tasks (BBL):

    - Week of August 4 (Remainder)

        - Continue Site Survey (Topography)

    - Week of August 11

        - Complete Geophysical Survey (if necessary)
        - Complete Site Survey (if necessary)
        - Traffic Survey (Postponed of Phase II, if necessary)
        - Complete UST Characterization
        - Complete Phase I Pre-Design Investigation Activities on August 15

5. Schedule for Future Project Status Meetings (BBL): Meetings will continue to be held at the site trailer on Thursdays at 10:00 to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend).

6. Public Fact Sheet status (EPA): GE/BBL provided photos to EPA for inclusion in the fact sheet. Cheryl indicated that the memo would likely be finalized this week and that she would distribute to the public over the upcoming weekend or next Monday.

7. Update on Status of Agency Review/Comments to Work Plans (EPA/NHDES): Tom Andrews indicated that he will attempt to provide NHDES comments to Cheryl Sprague during the week of August 11. Cheryl indicated that she is compiling the comments provided by Andy Beliveau (EPA) and needed to get/incorporate USACE, NHDES, and Town of Milford comments. EPA has indicated that issues regarding the QAPP are likely to be the only major items requiring resolution. To that end, EPA has issued draft QAPP comments to GE. EPA believes that other issues can be resolved over a conference call or through an approval letter with modifications.

8. Other Miscellaneous Topics/Questions and Answers -- Identified items will remain on list until resolved (Miscellaneous):

    - Town of Milford has requested a meeting with the Town (Police, Fire, and Superintendent of Schools) during the 2nd or 3rd week of August to discuss Phase II schedule.

    - During the July 24 status update meeting, EPA informed GE that samples obtained from area of the former driveway between the former buildings at the Elm Street Site exhibited "low" hits of PCBs. These data were reported in the USACE's building demolition report. GE/BBL has requested copies of this report from USACE.

    - Attempts to locate monitoring wells NHDES-01 and NHDES-02 by representatives of BBL, EPA and NHDES during the recent monitoring well survey were unsuccessful. Tom Andrews indicated that he has performed some preliminary searches of the project files to locate information related to those wells, but has been unsuccessful in finding any information at this time. Tom indicated that he will continue to look for information.

    - Cheryl Sprague asked/recommended that BBL compare the results of the geophysical investigation against the results of the geophysical investigation performed during the RI.

Fletcher's Paint Works and Storage Facility Superfund Site
Phase I Pre-Design Investigation Project Status Update
August 14, 2003 Conference Call Minutes

<u>10 AM – Conference Call</u> – Discussion leader(s) for each topic identified in parentheses.

1. Participants:

    - BBL – Corey Averill (Project Manager)
    - GE – Lew Streeter (Project Manager)
    - EPA – Cheryl Sprague (Project Manger)
    - USACE – Scott Acone (Project Manager)

2. Health & Safety Update (BBL):

    - No accidents last week, zero lost time accidents to date.
    - Notified EPA that the sand used to fill the hole near the corner of the former Elm Street building had either sunk further into the hole or been washed out during a recent rain event. Notified EPA that the hole would not be filled again until an additional GPR investigation could be performed this week (as part of the ongoing geophysical investigations) to verify that no large void/UST was present below the hole. In the interim, the site is fenced in and the caution tape has been placed around the location in question. Upon confirmation that no large void is present, the hole will be filled with sand.

3. Summary of Tasks Performed During Previous Week (BBL, with comments and discussion by others):

    - Continued Site Survey (Topography)
    - Continued Geophysical Survey – GPR only

        - Investigating anomaly in vicinity of MW-03 – possibly resinous material
        - Investigating anomaly in northwest portion of Elm Street Site
        - Investigating hole in vicinity of former building at the Elm Street Site (same hole EPA directed GE/BBL to backfill)
        - Cheryl recommended that GE/BBL compare the results of geophysical investigation against the similar investigation performed for EPA as part of the RI.
        - Scott indicated that a USACE geologist was on-site during the geophysical investigations and had no comments on the observed activities.

    - Completed UST Characterization:

        - Located 3 USTs and sampled contents where appropriate:
        - <u>UST M14-N</u>: UST dimensions are approximately 15 feet long by 5 feet wide. Contained 0.2 feet of liquid with strong odor – possibly mineral spirits based on historic usage. Very thin water layer under product. Samples collected from product layer.
        - <u>UST M14-S</u>: UST with same dimensions as M14-N, film/sheen on bottom of UST (volume insufficient to sample), similar odor as M-14N contents.

3. Summary of Tasks Performed During Previous Week (BBL, with comments and discussion by others) (continued):

    - UST M12: Storm water control or retention UST with grated open drop inlet. UST full of water with soft sediment layer in bottom. Water and sediment samples collected.
    - Sampling locations were surveyed and tanks were backfilled (grate inlet on M12 covered prior to backfilling).

4. Summary of Near-Term Tasks (BBL):

    - Week of August 11 (Remainder)

        - Complete Site Survey (if necessary)
        - Complete Geophysical Survey (if necessary)

    - Complete Phase I Pre-Design Investigation Activities on August 15

5. Schedule for Future Project Status Meetings (BBL, with comments and discussion by others):

    - Since Phase 1 activities will be completed this week, no further project status calls/meetings will be held until Phase 2 pre-design investigation activities are ongoing.
    - Corey/Lew indicated that start date for Phase 2 activities was dependent upon several factors, including: receipt, review and response to EPA/NHDES/Town comments on the revised draft plans; issuance of final plans; kickoff meeting; and, impact of first day/week of school/labor day on schedule.
    - During Phase 2, weekly progress meetings will continue to be held at the site trailer or via conference call on Thursdays at 10:00.
    - Prior to the onset of Phase 2 investigation activities and at the request of the Town, GE/BBL will host a Phase 2 kickoff meeting at the Site at a time and date to be determined. Lew to follow up with Katie Chambers (Town of Milford Administrator) to coordinate/identify date for kickoff meeting. Kickoff meeting to be held at least one week prior to mobilization to the Site. EPA recommended possibly having meeting as part of an upcoming Town Selectmen meeting.
    - Cheryl indicated that following the Phase 2 kickoff meeting, EPA would like to review/confirm the sampling locations staked out on the riverbank.

6. Public Fact Sheet status update (EPA, with comments and discussion by others): The Public Fact Sheet was finalized and distributed to the community between July 30 and 31. Cheryl was asked to provide copies for GE, BBL, and the site office trailer.

7. Update on Status of Agency Review/Comments to Work Plans - Schedule for Phase 2 Pre-Design Activities (EPA, with comments and discussion by others):

    - Cheryl indicated that she would attempt to finalize EPA comments to plans this coming weekend, prior to her vacation (August 16 through August 31).

7. Update on Status of Agency Review/Comments to Work Plans - Schedule for Phase 2 Pre-Design Activities (EPA, with comments and discussion by others) (continued):

    - EPA has received comments from USACE and Town of Milford (no additional comments). EPA still needed to coordinate with Andy Beliveau (EPA) regarding other comments on Sampling and Analysis Plan (SAP) and NHDES regarding their comments to plans.
    - EPA, USACE, GE, and BBL then discussed certain of the draft SAP comments provided by EPA (e.g. General Comment #1, General Comment #7, Specific Comment #2, Specific Comment #11 etc.). GE/BBL indicated that they would provide a draft response to comment letter to EPA via e-mail, with copy to Andy Beliveau.

8. Other Miscellaneous Topics/Questions and Answers -- Identified items will remain on list until resolved (Miscellaneous):

    - Town of Milford requests a meeting with the Town (Police, Fire, and Superintendent of Schools) during the 2nd or 3rd week of August to discuss Phase II schedule.

Fletcher's Paint Works and Storage Facility Superfund Site
Phase 2 Pre-Design Investigation Kickoff Meeting Minutes
December 1, 2003

11 AM – Site Trailer (Keyes Park)

1. **Participants:**

- GE: Lewis Streeter (Project Manager)
- BBL: Corey Averill (Project Manager), Leanne Roulier (Field Team Leader), Jason Gutkowski (Field Technician), Adam Baird (Field Technician)
- EPA: Cheryl Sprague (EPA Project Manager)
- Aries Engineering, Inc: Thomas Roy (Town of Milford Environmental Consultant)
- USACE: Scott Acone (Project Manager), David Lubianez (Field Oversight), Rose Schmidt (Field Oversight)
- Town of Milford: Katie Chambers (Town Administrator), Bill Ruoff (Director of Public Works Department), Captain Richard Fortin (Commander-Milford Police Department), Thomas Neforas (Public Works Department)
- Woods Hole Group: Maurak Turprinent (Scientist), Jim Bajek (Scientist)
- ENSR: Debra L. Mcgrath (Chemist)

2. **General Schedule/Agenda Discussion (BBL)**

- Phase 2 Soil Sampling Activities:

  - The beginning of the soil boring program will be focused on Mill St. due to data needs. Specifically BBL will begin with D, E, F and G lines. The exact location of the C line will be based on future discussion regarding property location of C line and notification to railroad.
  - BBL to notify EPA and USACE of specific schedule/sequencing of work to aid in the scheduling of oversight and split sampling activities. For the next two weeks, BBL plans to stay at the Mill Street Site as discussed above, moving to surficial sampling (possibly including river banks) at the Elm Street site.
  - Due to construction activities at 51 Elm St. (parcel 25-11, Elm St. Chiropractor) surface soil samples will be collected as soon as possible, at the request of the EPA and property owner.
  - EPA/USACE will provide GE/BBL with a list of soil sample locations that they are specifically interested in for oversight and split sampling. As it stands they are interested in the C line at Mill Street (C-13 in particular), the downgradient wells at Mill Street, and soil borings at Elm Street.

- Phase 2 Monitoring Well Installation:

  - Monitoring well installation activities are anticipated to begin the week of December 8.
  - Well installations will generally proceed from the upgradient wells (MW-25B,C and MW-10C), to MW-5B, to the Elm Street Wells and finishing with the Mill Street Wells. EPA/USACE are interested in obtaining splits from monitoring well locations at both Mill and Elm Street sites.
  - Monitoring well relocations for MW-23 and MW-24 were discussed. BBL to provide EPA/USACE with figure depicting updated locations prior to installation.

- Groundwater sampling activities will not begin until all new/replacement monitoring wells have been installed. The EPA/USACE has requested a 2 week notification prior to groundwater sampling activities.

3. Summary of Tasks To Be Performed This Week (BBL)

- Continue access notifications.

- Initiate surface/subsurface soil investigation activities at Mill Street Site.

- Health and Safety/Site Preparation

  - Exclusion and Contaminant Reduction Zones Delineation
  - Construction of Decontamination Pad and investigation-derived waste staging area
  - Modified Level D – Subsurface Investigations
  - Air Monitoring will be conducted during intrusive activities.
  - Mill Street Site Public Restriction- BBL to give the Mill Street residents and businesses a week notice via flyer to close down Mill Street to local traffic only. During periods of street closure, BBL to call the school and school bus company in advance and to provide notification on a daily basis to Milford Police Department dispatch at (613) 672-0520.
  - Investigation Derived Waste will be consolidated in a bermed and lined area at the Elm Street Site next to the decontamination pad.

- Complete Property Surveys – Meridian Land Services, Inc. has posted the 4 corners of parcel 25-111 (Mill Street Site). Remainder of property line/boundary survey activities and map preparation are ongoing.

- Survey of Sample Locations

  - Resurvey of sample locations where stakes were removed at Mill Street Site and Elm Street Site will be performed as needed (i.e., upon sample collection). BBL technicians will tape off missing locations for resurvey with GPS by BBL surveyors.
  - Woods Hole and USACE request coordinates for staked locations along the Souhegan River so that they may tape off their sediment sampling locations. BBL to provide data and leave all stakes located on river bank in the ground after sampling is completed.

4. Summary of Near-Term Tasks (BBL)

- Dig Safe Clearance for Mill Street and Elm Street Sites complete for soil boring program.
- Water and Sewer Clearance by Town – BBL working with Bill Ruoff to coordinate.
- Continue with soil sample collection activities at Mill Street Site and Parcel 25-11.
- Initiate Monitoring Well installation activities – A drilling contractor will be chosen this week.

5. Schedule for Future Project Status Meetings (BBL)

Weekly status meetings will be held at the site trailer in Keyes Park on Thursdays at 11AM until further notice. A reminder will be sent to interested parties and there will be a phone number available to conference in.

6. Distribution of Final Work Plans

Copies of November 2003 *Pre-Design Work Plan, Project Operations Plan* and Contact Sheet (BBL) were distributed to Town of Milford, EPA, and USACE representatives.

7. Update from EPA regarding comments to Surface Water and Groundwater Monitoring Plan

EPA is still finalizing comments to Surface Water and Groundwater Monitoring Plan and Monitoring Well Survey Results Letter.

8. **Other Miscellaneous Topics/Questions and Answers**

- USACE and Woods Hole Group personnel will initiate sediment sampling activities adjacent to the Elm Street Site.

- USACE and Woods Hole Group personnel were informed they can use end of office trailer for work space and equipment trailer for equipment storage.

- ENSR to deliver glassware to the site trailer.

- USACE will not be collecting split samples of D, E, F, G lines at Mill Street Site or surface samples at Elm Street Site. Split samples will be collected form certain soil borings at Mill and Elm Street Sites, as well as from certain monitoring wells.

- USACE will not be collecting splits for VOCs.

- EPA/USACE to provide BBL with list of split sample locations and copies of OU-2 sediment sampling work plans.

- USACE inquired about Geophysical results to better focus their split sampling activities. BBL to review geophysical data for use in this application.

Fletcher's Paint Works and Storage Facility Superfund Site
Phase 2 Pre-Design Investigation Progress Meeting Minutes
December 4, 2003

11 AM – Site Trailer (Keyes Park)

1. Participants

- GE: Lewis Streeter (Project Manager)
- BBL: Corey Averill (Project Manager), Leanne Roulier (Field Team Leader)
- EPA: Cheryl Sprague (EPA Project Manager)
- Aries Engineering, Inc: Thomas Roy (Town of Milford Environmental Consultant)
- USACE: Scott Acone (Project Manager), Rose Schmidt (Field Oversight)
- Town of Milford: Katie Chambers (Town Administrator)

2. Summary of Tasks Performed During Previous Week (BBL)

- Continued access notifications:
  - BBL to notify property owners for well installations as soon as schedule is set. Railroad notification to be sent out December 5. Railroad notification includes a three week window for work on the railroad property.
- Surface/subsurface soil investigation activities:
  - BBL has initiated surficial soil sampling at Mill Street this morning and plans to start soil boring activities this afternoon.
  - BBL has initiated surface soil investigation at parcel 25-11 (Chiropractor at 51 Elm Street) at request of EPA and property owner. BBL conducted soil sampling in the vicinity of construction activities at parcel 25-11. At the request of the property owner, BBL will return on Tuesday or Thursday of next week (when the chiropractor's office is closed) to complete sampling in the driveway and on the remainder of the property.
- BBL to finalize Mill Street closure flyer for distribution to impacted residents. BBL to provide EPA and Town of Milford with a copy of the final flyer and provide Town of Milford with copies of latest EPA fact sheet (which will accompany the flyer).
- Continuation of property line/boundary survey.

Fletcher's Paint Works and Storage Facility Superfund Site
Phase 2 Pre-Design Investigation Progress Meeting Minutes
December 4, 2003

3. Summary of Near-Term Tasks (BBL)

- Monitoring well installation:
  - BBL to select monitoring well subcontractor today. Anticipated start date for monitoring well installation is December 11 or 12.
  - Neither BBL nor EPA/USACE will collect soil samples at MW-25 pair or MW-10C. EPA/USACE will likely have oversight available during well installations.
  - Tentative sequence for monitoring well installations is MW-25 pair followed by MW-10C, MW-5B, the Elm Street wells (MW-26A,B; MW-27A,B; MW-28A,B; and MW-29B), and the Mill Street wells (MW-22A,B,C; MW-23A,B,C; and MW-24A,B,C).

- BBL to follow up with the Town regarding water and sewer utility locations at the Elm Street site including drains and culverts.

- Tentative sequence for soil sampling activities is continue surface/subsurface soil sampling activities along the D, E, F and G lines at Mill Street, followed by performance of surface soil sampling at Elm Street Site, "C-line" samples at Mill Street Site and soil borings at Elm Street Site.

4. Schedule for Future Project Status Meetings (BBL)

Weekly meetings will continue to be held at the site trailer on Thursdays at 11:00 to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend).

5. Update on Status of Agency Review/Comments

EPA is working with NHDES to finalize comments to Surface Water and Groundwater Management Plan and Monitoring Well Survey Results Letter.

EPA approved relocating the C-Line of the grid at Mill Street from the elevated rail bed to the ground level adjacent to the retaining wall for the rail bed.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes for Phase 2 Pre-Design Investigation Progress Meeting
December 11, 2003

11 AM – Site Trailer (Keyes Park)

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager), Leanne Roulier (BBL Field Team Leader)
- EPA: Cheryl Sprague (EPA Project Manager)
- USACE: Rose Schmidt (Field Oversight)
- Town of Milford: Bill Ruoff (Director of Milford DPW), Tom Neforas (Milford DPW)

2. Summary of Tasks Performed During Previous Week (BBL)

- Access notifications completed for monitoring wells MW-10C and MW-25B,C.
- Ongoing surface/subsurface soil investigation activities at Mill Street
- Completed surface soil sampling at parcel 25-11 (Chiropractor at 51 Elm Street) and 25-11-1 (Town property)
- Mill Street closure notification flyer distributed December 5. Plan to close Mill Street, except for local traffic, on December 11, 2003.
- Continued property line/boundary survey activities (Mill Street).
    - Survey map of Mill Street Site expected by Friday December 12, 2003. BBL to furnish Town of Milford with map upon receipt.
- Continued coordination with Town regarding utility locations including drain and culverts at Elm Street site.

3. Summary of Near-Term Tasks (BBL)

- Phase 2 monitoring well installation. Start on Deecmebr 11, 2003 at monitoring well MW-10C.
- Continue surface/subsurface soil sampling activities at Mill Street.
- Continue property line/boundary survey activities (Elm Street).
- Continue structural survey of retaining walls at Elm Street.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes for Phase 2 Pre-Design Investigation Progress Meeting
December 11, 2003

4. Schedule for Future Project Status Meetings (BBL)

The status meeting for the week of December 15 will be held at the site trailer on Thursday, December 18, 2003 at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend).

For the holiday weeks of December 22 and 29, the meetings have been rescheduled to Tuesdays at 11:00 at the site trailer to discuss weekly progress (call-in numbers are the same for those unable to physically attend).

5. Other Miscellaneous Topics/Questions and Answers

- USACE (Rose Schmidt) requested access to BBL field notes. It was agreed that GE and BBL will share information provided actual field notes remain on-site and are not photo copied.

6. Update on Status of Agency Comments or Approval Items

- EPA approves to move line 18 up to 10 feet west due to the uncertain location of the drainage culvert at the Elm Street site.
- Update on status of EPA comments/approval for revised draft *Surface Water and Groundwater Monitoring Plan* and November 6, 2003 Monitoring Well Survey Results Letter.
- EPA suggests moving grid locations M-16, M-17 and M-18 north of the foundation at the Elm Street site.
- EPA approves the collection of PCB samples at the MW-2A monitoring well installation location in lieu of proposed soil boring K-18.
- EPA previously approved collecting surficial samples along the river bank (top, middle and bottom of bank) where the drill rig is unable to access for grid soil boring locations. Soil borings will be moved to the top of bank instead (i.e., J-18 at Elm Street changes to a boring and I-18 changes to a surficial).
- Tentatively EPA would like to collect split samples at Elm Street soil boring location Q-12 rather than N-12 (not a proposed location). Cheryl Sprague to confirm.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes for Phase 2 Pre-Design Investigation Progress Meeting
December 18, 2003

11 AM – Site Trailer (Keyes Park)

1. **Participants**
   - GE: Lewis Streeter (GE Project Manager)
   - BBL: Leanne Roulier (BBL Field Team Leader)
   - EPA: Cheryl Sprague (EPA Project Manager)
   - USACE: Scott Acone (USACE Project Manager), Rose Schmidt (USACE Field Oversight)
   - Town of Milford: Katie Chambers (Administrator, Town of Milford)

2. **Summary of Tasks Performed During Previous Week (BBL)**

   - Monitoring well installations complete at MW-10C and MW-25B,C.
     - BBL is currently installing soil boring K18 for replacement well MW-2A. Plan to install MW-5B on Friday, December 19, 2003.
   - Ongoing surface/subsurface soil investigation activities at Mill Street.
   - Continued property line/boundary survey activities (Mill Street and Elm Street).
     - BBL waiting for final mapping from Meridian at the Mill Street site. Survey field activities ongoing at Elm Street site.
     - Railroad property access. BBL has been in contact with the Railroad regarding monitoring well locations MW-23 and MW-24. The railroad does not have an engineer available to check site conditions prior to January 5. BBL to email photos showing proposed locations and drilling rig along with approximate distances from northern rail and street intersection. BBL to also contact railroad regarding the need for a flagman during work below the railroad bed on line C.

3. **Summary of Near-Term Tasks (BBL)**

   - Phase 2 monitoring well installation. Install replacement wells MW-5B and MW-2A this week. Start MW-26, MW-27 and MW-28 clusters week of December 22 and December 29.
     - USACE field oversight, Rose Schmidt, will be on site December 22 for split sampling and soil boring activities at monitoring well MW-26.
   - Complete surface/subsurface soil sampling activities at Mill Street with the exception of the C-Line.
   - Ongoing soil sampling at Elm Street site week of December 22.
   - Continue property line/boundary survey activities (Elm Street).
   - Continue structural survey of retaining walls at Elm Street.

4. Schedule for Future Project Status Meetings (BBL)

- For the holiday week of December 22 the meeting has been rescheduled for Tuesday at 11:00 AM at the site trailer to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend).

- For the week of December 29, the meeting is scheduled for Tuesday at 10:00 AM at the site trailer to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend).

5. Other Miscellaneous Topics/Questions and Answers

- Holiday field work schedule – BBL plans to be on-site December 22, 23 and possible ½ day December 24. BBL plans to be on-site January 29, 30 and possible ½ day January 31.
- USACE suggests BBL gather as much geotechnical data (i.e., sortedness, grading of soils) as possible during PCB soil delineation with PowerProbe. As previously discussed with USACE, BBL will continue to do so and follow up with project hydrogeologist and engineers.

6. Update on Status of Agency Comments or Approval Items

- EPA to collect split samples at Elm Street soil boring location Q-12 rather than N-12 (not a proposed location). Confirmed by EPA and USACE.
- EPA approves moving MW-27 and MW-28 well clusters on-site instead of on sidewalk of Elm Street. BBL to assess safety with overhead power lines and location of basement walls which may be constructed of granite.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
December 23, 2003

11 AM – Site Trailer (Keyes Park)

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager)
- USACE: Scott Acone (USACE Project Manager), Rose Schmidt (USACE Field Oversight)
- Town of Milford: Tom Neforas (Administrator, Town of Milford)
- Aries Engineering: Tom Roy (Environmental Consultant for Town of Milford)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

- Monitoring well installation activities are ongoing at MW-26.

- BBL performed soil boring K18 in anticipation of installing replacement monitoring well MW-2A. Auger refusal occurred at this location at 16.5 feet below grade. With EPA approval, MW-2A was relocated to soil boring J18. Soil boring J18 was previously moved, with EPA approval, to the top of bank from I18. Analytical samples were collected from 0 to 23 feet at J18. Due to auger refusal, no additional attempts to install soil boring K18 will be made. Finally, USEPA substituted soil boring location I06 for K18 for split sampling activities.

- Installed replacement well MW-5B on Friday, December 19, 2003.

- Surface/subsurface soil investigation activities at Mill Street site complete with exception of the C-Line and soil boring E03. USEPA visited the Mill Street site prior to today's meeting. Based on that site visit, soil boring EO3 was relocated approximately 7 feet south and 5 feet east of the original location staked in the drainage culvert.

- BBL is continuing dialogue with the Railroad regarding installation of monitoring wells at locations MW-23 and MW-24 and soil sampling activities along grid line C.

- BBL is continuing to coordinate with USACE regarding oversight/split sampling of soil boring C-13 and the MW-23 cluster during the week of January 5, on or after January 6.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
December 23, 2003

3. Summary of Near-Term Tasks (BBL)

- Install monitoring well pairs at MW-26, MW-27, and MW-28, as well as single well at MW-29, possibly starting this week or the week of December 29.

- Continue soil sampling at Elm Street site week of December 29.

- Perform structural survey of retaining walls at Elm Street. Survey field work has been completed and maps have been drafted. BBL is waiting for final mapping.

- Soil sampling activities along the riverbank and in the low-lying area between the Elm Street site and the support zone located at Keyes Field will be postponed due to unsafe conditions. Conditions will be reassessed regularly.

4. Schedule for Future Project Status Meetings (BBL)

For the week of December 29, the weekly status meeting is scheduled for Tuesday at 10:00 AM at the site trailer to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend). As of the week of January 5, 2004, we will return to the regular schedule for weekly project status meetings, which is Thursdays at 11:00 AM at the site trailer

5. Other Miscellaneous Topics/Questions and Answers

BBL and USACE representatives visited the Mobil Station south of the Elm Street Site after the meeting in an attempt to locate well Mobil-1/AE-1, but were unable to locate the well. USEPA plans to provide a decision regarding the replacement of this former well within two weeks.

6. Update on Status of Agency Comments or Approval Items

- USEPA approved relocation of MW-27 and MW-28 well pairs behind the Jersey barriers at the Elm Street site, instead of on sidewalk adjacent to Elm Street Site, due to safety concerns with overhead power lines at location. MW-28A/B require placement at least 10' north of jersey barrier. MW-27A/B can be installed within 5' of the jersey barrier.

- EPA is working with NHDES to finalize comments to Surface Water and Groundwater Management Plan and Monitoring Well Survey Results Letter.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
December 30, 2003

10 AM – Site Trailer (Keyes Park)

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager)
- USACE: David Luvianez (USACE Field Oversight), Rose Schmidt (USACE Field Oversight)
- Aries Engineering: Tom Roy (Environmental Consultant for Town of Milford)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

- Monitoring well MW-27A installation completed. Some obstructions were encountered during installation of MW-27B. If MW-27B cannot be installed with hollow stem augers, other methods such as air hammer will be utilized.

- No soil boring activities week of December 29.

- Completed soil boring EO3 at the Mill Street site with exception of VOCs/SVOCs due to holiday lab schedule. BBL to complete VOC/SVOC sampling subsequent to sampling of C-Line at the Mill Street site.

- BBL continuing to coordinate with the Railroad regarding monitoring well locations MW-23 and MW-24 and soil boring line C. Railroad representatives have confirmed/approved the schedule for work activities along the railroad bed next week. According to the Railroad, the traffic along this portion of the railway is highly sporadic. Suggestions were made regarding scheduling with the companies that use the railway (i.e., Draper Coal, Gravel Yard). BBL plans to talk with Railroad representatives again on Friday of this week to finalize coordination.

3. Summary of Near-Term Tasks (BBL)

- Soil sampling at Elm Street for the week of December 29 may include soil boring S-20 where monitoring well MW-28A is to be installed.

- Installation of monitoring well pair at MW-28, followed by MW-29B. Mill Street site monitoring well installations within railroad right-of-way (MW-23 and MW-24 clusters) scheduled for week of January 5.

- USACE field oversight is available January 7 through 9 for oversight/split sampling during the installation of monitoring well cluster MW-23 and soil boring C-13. Since no oversight/split sampling is required at the MW-24 cluster, BBL plans to start at at this location on January 5 (provided agreement with the Railroad site engineer regarding work locations). BBL will subsequently begin installation of monitoring well cluster MW-23 and soil boring C-13 when USACE oversight is available. Since these activities may extend beyond January 9, BBL and USACE will continue to coordinate regarding oversight/split sampling activities.

4. Schedule for Future Project Status Meetings (BBL)

The next meeting will be held at the site trailer on Thursday, January 8 at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend).

5. Other Miscellaneous Topics/Questions and Answers

Tom Roy (Aries Engineering) contacted the environmental consultant for the Snack Corner Mobil on Elm St., regarding the status of monitoring wells AE-1 and AE-4 (Mobil-1 and Mobil-4). Both wells were destroyed by the property owner and subsequently replaced by JB-2/MW and JB-6/MW, respectively. Former monitoring wells AE-1 and AE-4 were not properly decommissioned.

6. Update on Status of Agency Comments or Approval Items

- USEPA approved relocation of Mill Street soil boring EO3 approximately 7 feet south and 5 feet east of the original location that had been staked in the drainage culvert.

- USEPA approved relocation of monitoring well cluster MW-28 relative to overhead power lines along Elm Street (approximately 10 feet north of jersey barriers).

- USEPA agreed to completion and relocation of soil borings K18 and J18.

- USEPA substituted soil boring I06 for K18 for split sampling activities at Elm Street.

- EPA is working with NHDES to finalize comments to Surface Water and Groundwater Management Plan and Monitoring Well Survey Results Letter.

Draft for EPA Review

2004 Meeting Minutes

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engineers, scientists, economists

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
January 8, 2004

11 AM – Site Trailer (Keyes Park)

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager), Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager)
- USACE: David Luvianez (USACE Field Oversight), Rose Schmidt (USACE Field Oversight)
- Town of Milford: Tom Neforas (Town of Milford, DPW)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Monitoring Well Installations:

- Monitoring well MW-27B was not installed last week due to auger refusal at 4 locations. Following work along the railroad right of way, drilling will resume at MW-27B using a down-hole air hammer drilling methods.

- Soil boring S-20 was completed during the installation of MW-28A on December 30 and 31. Monitoring wells MW-28A and MW-28B were installed on December 31.

- Ongoing well installations along railroad right of way. MW-24C was installed to bedrock and the casing has been set. MW-24A has been sampled to bedrock and installed.

Phase 2 Soil Boring Program:

- Completed soil sampling at the Mill Street site with the exception of the C-Line.

- Completed soil borings C-05, C-07, C-15, C-17, and C-19 at the Mill Street site.

- Soil boring C-13 was completed along with split samples in the morning prior to the weekly status meeting.

3. Summary of Near-Term Tasks (BBL)

Phase 2 Monitoring Well Installations:

- MW-24B will be completed by the end of the day today. BBL plans to core MW-24C Friday, January 9.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
January 8, 2004

3. Summary of Near-Term Tasks (continued) (BBL)

- MW-23C installation/sampling moved to Monday, January 12.

- MW-23C will be sampled from the surface to top of rock as previously discussed. Samples from MW-23C that correspond to the screened intervals at adjacent monitoring wells MW-23A and MW-23B will be replaced by samples collected at MW-23A and MW-23B. BBL to split held samples from MW-23C if sample volume is insufficient at MW-23A or MW-23B for split sampling.

- The MW-22 cluster will be installed on Town of Milford Property. BBL proposes to collect samples for nearby soil boring C-09 at MW-22 cluster location.

Phase 2 Soil Boring Program:

- Ongoing soil sampling at Mill Street site. BBL to continue along C-Line.

- Mill Street: Soil borings C-01 and C-03 and surficials C-02 and C-04 will be completed within railbed. These locations could not be relocated adjacent to railbed due to the close proximity of the Draper shed and retaining wall.

- Elm Street: Subsurface PCB samples were collected at grid location S-20 rather than T-20 in concert with the installation of MW-28A. MW-28A/B was originally proposed at soil boring T-20. T-20 will be sampled as a surficial sample location.

- BBL requests to relocate surficial soil sampling locations T-15, T-17, T-18, T-19 and T-20 to inside the jersey barriers as were monitoring well clusters MW-27 and MW-28. This topic is subject to further discussion and field visit.

4. Schedule for Future Project Status Meetings (BBL)

- Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend).

5. Other Miscellaneous Topics/Questions and Answers

- Estimated schedule for well development and groundwater sampling.

  - Well development is tentatively scheduled for the weeks of January 19 and 26.
  - Water level measurements and groundwater sampling is tentatively scheduled for the weeks of February 2, 9, and 16.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
January 8, 2004

6. Update on Status of Agency Comments or Approval Items

- USEPA approves the collection of samples for soil boring C-09 at the MW-22 cluster location at the Mill Street site.

- USEPA is working with NHDES to finalize comments to Surface Water and Groundwater Management Plan and Monitoring Well Survey Results Letter. USEPA expects to deliver comments to GE the week of January 19.

- USEPA approves collection of samples at soil borings C-01 and C-03 and surficials C-02 and C-04 within railbed, at original locations proposed in Pre-Design Work Plan. These locations could not be relocated adjacent to railbed due to the close proximity of the Draper shed and retaining wall.

- USEPA approves designation of location T-20 as a surficial sample location.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
January 15, 2004

11 AM – Conference Call

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager)
- USACE: Scott Acone (USACE Project Manager); David Luvianez (USACE Field Oversight)
- Aries Engineering: Tom Roy (Environmental Consultant for Town of Milford)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Monitoring Well Installations:

- Bedrock monitoring well MW-24C was cored and temporarily left with open-hole construction for geophysical logging.

- Geophysical logging completed for monitoring wells MW-10C, MW-25C and MW-24C. Geophysical work consisted of fluid temperature/fluid resistivity, caliper, and acoustic televiewer video logging.

- MW-22C has been sampled to bedrock as soil boring C-09. Casing was also installed at MW-22C in preparation for rock coring. Split spoon sampling at MW-22A has been completed up to 13 feet.

- Drilling crew demobilized due to unsafe weather conditions. Plan to remobilize on Monday, January 19th.

Phase 2 Soil Boring Program:

- Completed soil borings C-01, C-09, C-11, C-13 at the Mill Street site.

- Completed surficial soil sampling for C-line (C-02, C-04, C-06, C08, C-10, C-12, C-14, C-16, C-18, and C-20.

3. Summary of Near-Term Tasks (BBL)

Phase 2 Monitoring Well Installations:

- MW-23C installation/sampling moved to Monday, January 19. USACE oversight plans to be present for split sampling at the MW-23 cluster.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
January 15, 2004

4. Summary of Near-Term Tasks (BBL) – Continued.

- Installation of MW-22A and MW-22B will resume subsequent to the installation of the MW-23 cluster.

Phase 2 Soil Boring Program:

- Ongoing soil sampling at Mill Street site. Soil boring C-03 remains and will be sampled on Monday, January 19. This will complete grid soil sampling at the Mill Street.

- BBL plans to start with the T, S, and R grid lines at the Elm Street once soil sampling is complete at Mill Street. A police officer has been scheduled for Friday, January 23, to direct traffic, during the collection of surficial samples along the T-line on the sidewalk of Elm Street.

3. Schedule for Future Project Status Meetings (BBL)

- Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM (with the exceptions noted below) to discuss weekly progress. The call-in number 866 606-4717, access code 7486861 for those unable to physically attend.

- The February 19, 2004, meeting will be held at the site trailer at 10:00 AM to discuss weekly progress. The call-in number and access code will be the same for those unable to physically attend.

4. Other Miscellaneous Topics/Questions and Answers

- Estimated schedule for well development and groundwater sampling.

  - Well development is scheduled for the weeks of January 19 and 26.
  - Water level measurements and groundwater sampling are tentatively scheduled for the weeks of February 2, 9, and 16.

5. Update on Status of Agency Comments or Approval Items

- USEPA is working with NHDES to finalize comments to Surface Water and Groundwater Management Plan and Monitoring Well Survey Results Letter. USEPA expects to deliver comments to GE the week of January 19.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
January 22, 2004

<u>11 AM – Site Trailer</u>

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager); Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager)
- USACE: David Lubianez (USACE Field Oversight); Rose Schmidt (USACE Field Oversight)
- Town of Milford: Katie Chambers (Town of Milford Administrator); Tom Neforas (Town of Milford DPW)
- Aries Engineering: Tom Roy (Environmental Consultant for Town of Milford)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Monitoring Well Installations:

- Remobilized Monday, January 19. Installed soil boring for MW-22A to 15.6 feet below grade (casing refusal). Relocated soil boring for MW-22A and sampled to 9 feet below grade.

- Work at MW-22A was temporarily put on hold in order to mobilize to the MW-23 cluster with ATV rig and scheduled railway flagperson.

- Installed MW-23C to bedrock and set casing. Samples were split with USACE oversight.

- Installation of MW-23A is in progress. Due to lack of recovery and excessive outwash materials at the proposed screened interval for MW-23A, the first MW-23A pilot soil boring was abandoned. To aid in the removal of more coarse soil cuttings during the second attempt to install MW-23A, bentonite gel was added to the drilling water for use with drive and wash techniques. Additional water will be removed during well development to ensure removal of any drilling fluid that may have entered the formation. An aqueous sample of the bentonite gel mixed with water from the drill rig will be collected and analyzed for VOCs, SVOCs, and PCBs. The procedures followed during mud rotary drilling at monitoring well MW-23A can be found in ASTM Standard D5783-95 (Reapproved 2000) entitled *"Standard Guide for Use of Direct Rotary Drilling with Water-Based Drilling Fluid for Geoenvironmental Exploration and the Installation of Subsurface Water-Quality Monitoring Devices"*. The addition of bentonite gel to drilling fluids has been noted in the field log and will be noted on the monitoring well log for MW-23A. Additional details regarding this drilling technique will be included in the PDI report.

3. Summary of Tasks Performed During Previous Week (BBL) – Continued.

- Monitoring well development and specific capacity testing was initiated January 19. Development and specific capacity testing has been completed at the following wells: MW-5A, MW-10A, MW-10B, MW-10C, MW-25B, and MW-25C.

Phase 2 Soil Boring Program:

- Completed soil boring C-03 at the Mill Street site. All surface samples and soil borings proposed in the PDWP for the Mill Street site have been collected/completed.

- Collected surficial soil samples from the S-line (S-11, S-13, S-17), Q-line (Q-17), and R-line (R-10, R-11, R-17) at the Elm Street site.

- Completed soil borings S-14, S-16, S-18, and S-22 at the Elm St site.

4. Summary of Near-Term Tasks (BBL)

Phase 2 Monitoring Well Installations:

- Complete installation of MW-23 cluster.

- Installation of MW-22A and MW-22B will resume subsequent to the installation of the MW-23 cluster.

- Continue monitoring well development and specific capacity testing.

Phase 2 Soil Boring Program:

- Ongoing soil sampling at Elm Street site. Scheduled sampling of T-line surficial sampling on sidewalk of Elm Street for Friday, January 23, as coordinated with Town of Milford Police Department who will have an officer on site to direct pedestrians across the street and slow vehicular traffic.

- Tentatively scheduled to complete the R-line of surficial samples along the south wall of the cemetery at Elm Street the week of January 26.

- In general, the soil boring crew will be moving northward from Elm Street and to areas that may soon be inaccessible due to potential snow accumulation on site. Scheduled split sampling of soil boring Q-12 for week of January 26.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
January 22, 2004

3. Schedule for Future Project Status Meetings (BBL)

- Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend).

4. Other Miscellaneous Topics/Questions and Answers

- Water level measurements and groundwater sampling are tentatively scheduled for the weeks of February 2, 9, and 16.

5. Update on Status of Agency Comments or Approval Items

- USEPA is working with NHDES to finalize comments to Surface Water and Groundwater Management Plan and Monitoring Well Survey Results Letter. Comments are expected the week of January 26.

- USEPA approved the modified drilling method for MW-23A as described in section 2.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
January 29, 2004

<u>11 AM – Site Trailer</u>

1. Participants

- GE: Lewis Streeter (GE Project Manager); Paul Hare (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager); Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager)
- USACE: David Lubianez (USACE Field Oversight); Rose Schmidt (USACE Field Oversight)
- Town of Milford: Tom Neforas (Town of Milford DPW)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Monitoring Well Installations:

- Installation of monitoring wells MW-23A and MW-23B complete. MW-23C has been cored and developed.

- Installation of monitoring well MW-22A and MW-22B complete.

- Monitoring well development and specific capacity testing ongoing. Development and specific capacity testing has been completed at the following wells: MW-04A, MW-04B, MW-09A, MW-09B, MW-23A, MW-23B, MW-23C, MW-24A, MW-24B, MW-28A, and MW-28B.

- Monitoring well development at MW-21C is ongoing. On January 21, the BBL field crew found what appears to be trace amounts of DNAPL at MW-21C at the Mill St site. The NAPL was discovered in the early stages of well development. At present, well development has not been completed at this location. The following measurements/observations were made by the field crew:

    - The total depth of the well (TIC) was measured at 30.95' was made using an interface probe (reported construction depth of the well was 29.5' bgs with a stick-up/riser height of approximately 1.5' for a total of 31'). No NAPL was detected with the interface probe.
    - The bottom of the well was hard (i.e., no sediment in the well).
    - The NAPL was detected prior to well development when a bailer was used to confirm that no sediment was present in the bottom of the well (as per the well development SOP).
    - The water was observed to be highly turbid, dark brown, with trace droplets of NAPL.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
January 29, 2004

2. Summary of Tasks Performed During Previous Week (BBL) – Continued.

- Field measurements/observations at MW-21C - Continued:

  - There was an observed sheen on the water.
  - There was no odor in the breathing zone.
  - The well headspace PID reading was 0 ppm.

- To investigate the presence of NAPL in MW-21C, GE suggested the following course of action (subsequently approved by EPA):

  - Prior to well development, collect a sample of sediment/NAPL/water mixture and analyze for PCBs, VOCs, and SVOCs. (Note that this sample was collected with a bailer from the bottom of MW-21C and was not the original material removed from the well. The sample did contain a sheen. The original mixture had been placed in a bucket and subsequently transferred to a 55-gallon drum).
  - Develop monitoring well and collect specific capacity data as proposed in the Pre-Design Work Plan.
  - Check the bottom of the well with a bailer on a monthly basis during water elevation monitoring to determine if NAPL is persistent.
  - Remove NAPL with a bailer, if present.

Phase 2 Soil Boring Program:

- Completed surficial soil sampling along the T-line (T-15, T-17, T-18, T-19, T-20) in the sidewalk of Elm Street.

- Completed surficial soil sampling along the east-west trending cemetery wall for R-18, R-19, R-20, R-21 and R-22.

- Completed surficial soil sampling at L-15, L-16, L-17, L-18, M-17, N-18, and P-18.

- Completed soil borings O-18, Q-10, Q-14, Q-16, Q-18 and S-12 at the Elm St site.

3. Summary of Near-Term Tasks (BBL)

Phase 2 Monitoring Well Installations:

- Grout the sump of monitoring wells MW-23C and MW-24C into bedrock and complete the well installation tomorrow.

- Install soil boring for MW-29B/O-14 and install monitoring well.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
January 29, 2004

3. Summary of Near-Term Tasks (BBL) – Continued.

Phase 2 Monitoring Well Installations:

- Complete installation of MW-27B using air hammer and hollow stem auger drilling techniques. A stainless steel well screen and riser will be used at this location to avoid potential destruction of well due to the presence of a boulder zone located approximately 13-17 feet below grade.

- The estimated finish date for the monitoring well installation program is Tuesday, February 3, 2004.

- Continue monitoring well development and specific capacity testing next week.

Phase 2 Soil Boring Program:

- Ongoing soil sampling at Elm Street site. In general, the soil boring crew will be moving northward from Elm Street and to areas that may soon be inaccessible due to potential snow accumulation on site.

- As per field discussion with USEPA on December 1, 2003, surficial soil sampling locations E-00, F-00, and G01 are being relocated along the access road and/or the base of the slope.

- The estimated finish date for the soil boring program as proposed in the PDWP with the exception of river bank sampling is February 13, 2004. BBL will return to complete river bank and additional delineation sampling when conditions improve.

4. Schedule for Future Project Status Meetings (BBL)

Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend).

5. Other Miscellaneous Topics/Questions and Answers

Water level measurements and groundwater sampling are now scheduled for the weeks of February 9, 16, and 23.

6. Update on Status of Agency Comments or Approval Items

- USEPA is working with NHDES to finalize comments to Surface Water and Groundwater Management Plan and Monitoring Well Survey Results Letter. Comments are in review with NHDES.

- USEPA approved the course of action proposed above in section 2 for monitoring well MW-21C with regard to investigating NAPL presence.

- USEPA approved the relocation of surficial soil sampling locations E-00, F-00, and G01 that are on the steep slope of the western side of Keyes Park access road. Samples will be relocated in the same general area at GE's discretion.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
February 5, 2004

11 AM – Site Trailer

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager); Leanne Roulier (BBL Field Team Leader); Ronald Kuhn (BBL Field Scientist)
- USEPA: Cheryl Sprague (EPA Project Manager)
- USACE: David Lubianez (USACE Field Oversight)
- Town of Milford: Tom Neforas (Town of Milford DPW)
- Aries Engineering: Tom Roy (Environmental Consultant for Town of Milford)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Monitoring Well Installations:

- All proposed monitoring well installations complete. Recent monitoring well installations include MW-22C, MW-23C, and MW-24C at Mill Street, as well as MW-27B and MW-29B/O-14 at Elm Street.

- Monitoring well development and specific capacity testing is ongoing. To date, well development and specific capacity testing has been completed at the following wells: MW-01A, MW-01B, MW-02A(R), MW-02B, MW-03A, MW-04A, MW-04B, MW-04C, MW-05A, MW-05B, MW-08A, MW-08B, MW-09A, MW-09B, MW-10A, MW-10B, MW-10C, MW-11A, MW-11B, MW-18B, MW-21C, MW-22A, MW-22B, MW-22C, MW-23A, MW-23B, MW-23C, MW-24A, MW-24B, MW-24C, MW-25B, MW-25C, MW-26A, MW-26B, MW-28A, MW-28B, and MW-29B. The completion date for all monitoring well development and specific capacity testing is expected to be Friday, February 6th.

- Monitoring well development at MW-21C is complete. To investigate the presence of NAPL in MW-21C, a bailer was used to collect a sample of sediment, NAPL, and water mixture from the bottom of the well. This sample was submitted for PCB, VOC, and SVOC analyses. The well was then developed and specific capacity data collected as proposed in the Pre-Design Work Plan. Monitoring well MW-21C will be checked with a bailer on a monthly basis during water elevation monitoring to determine if NAPL is persistent. If present, NAPL will be removed with a bailer.

Phase 2 Soil Sampling Program:

- Completed surface soil sampling at C-01, D-01, E-01, F-02, G-03, and I-05 at Elm Street. Surface soil sampling at Elm Street completed with the exception of river bank and the "19" row.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
February 5, 2004

2. Summary of Tasks Performed During Previous Week (BBL) – (continued)

Phase 2 Soil Sampling Program (continued):

- Completed soil borings A-02, C-02, C-04, E-02, G-04, I-04, K-06, M-08, O-10, O-12, Q-12 at the Elm Street site. Soil borings Q-12 and M-08 were split with USACE.

3. Summary of Near-Term Tasks (BBL)

Phase 2 Groundwater Sampling:

- The proposed sequence for monitoring well sampling was forwarded to the USEPA and USACE for planning purposes. Groundwater sampling activities are scheduled to begin with monitoring wells upgradient of the Mill Street Site on Monday, February 9, 2004. Logistically, it will take approximately 1 hour per well to fill GE glassware and approximately 2 hours per well to fill USEPA glassware. Given QA/QC requirements, sampling scheme ("clean to dirty") and railroad access, the sampling sequence was designed to aid in the logistics required for extended sampling times, but will likely shift. Since a large portion of the groundwater sampling event includes split sample collection, GE requested that USACE oversight be available from February 11 through the 26th. GE will sample wells that are not proposed for split sampling on President's Day, February 16th.

  - The USACE is available from February 11 through the 26th. BBL will coordinate with the USACE should the schedule change. Split sample QA/QC (MS/MSD only) will be collected at MW-26A. BBL will update the schedule and redistribute.

  - The USEPA is planning to collect groundwater samples for 1,4 dioxane during this sample event at monitoring wells MW-04A, MW-04B, MW-04C, MW-07A, MW-11A, MW-11B, and MW-21C. MS/MSD and QA/QC duplicate samples will be collected at MW-04A and MW-21C, respectively. Per the proposed schedule, the USEPA will be on site to collect these samples on February 17, 18, and 26. BBL will coordinate with the USEPA should the schedule change.

Phase 2 Soil Boring Program:

- BBL to complete remaining soil borings and surface soil samples at Elm Street site next week. USACE oversight is available all week for remaining split sampling activities (i.e., I-06). BBL will schedule a date for split sampling and coordinate with USACE.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
February 5, 2004

4. Schedule for Future Project Status Meetings (BBL)

Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend).

5. Other Miscellaneous Topics/Questions and Answers

GE proposed the concept of collecting several additional soil boring locations on the Railroad property north of the Mill Street site based upon the presence of PCBs in soil samples collected along the "C" grid line. A flagman is scheduled for groundwater sampling and will be available for the remainder of the week for soil sampling, should GE proceed with such additional soil sampling. This work may be included in the current field mobilization, subject to receipt of approval from Railroad representatives. GE will present a table with proposed additional sample locations to the USEPA next week.

6. Update on Status of Agency Comments or Approval Items

USEPA is working with NHDES to finalize comments to Surface Water and Groundwater Management Plan and Monitoring Well Survey Results Letter. Delivery of comments to GE has been postponed until further notice.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
February 12, 2004

11 AM – Site Trailer

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager); Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager)
- USACE: Scott Acone (USACE Project Manager); David Lubianez (USACE Field Oversight); Yuri Yatsevitch (USACE Field Oversight)
- Town of Milford: Tom Neforas (Town of Milford DPW)
- Aries Engineering: Tom Roy (Environmental Consultant for Town of Milford); Katy Carlson (Chemical Engineer)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Monitoring Well Development:

- Monitoring well development and specific capacity testing was performed in accordance with the procedures specified in the November 2003 Pre-Design Work Plan (PDWP) and Field Sampling Plan (FSP) at monitoring wells MW-01A, MW-01B, MW-02A(R), MW-02B, MW-03A, MW-03B, MW-04A, MW-04B, MW-04C, MW-05A, MW-05B, MW-07A, MW-08A, MW-08B, MW-09A, MW-09B, MW-10A, MW-10B, MW-10C, MW-11A, MW-11B, MW-18B, MW-21C, MW-22A, MW-22B, MW-22C, MW-23A, MW-23B, MW-23C, MW-24A, MW-24B, MW-24C, MW-25B, MW-25C, MW-26A, MW-26B, MW-27A, MW-27B, MW-28A, MW-28B, and MW-29B.

Phase 2 Monitoring Well Sampling Program:

- Groundwater sampling activities were initiated on Monday, February 9, 2004. Groundwater samples were collected from monitoring wells MW-05A, MW-05B, MW-10A, MW-10B, MW-10C, MW-25B, MW-25C. On February 9, BBL distributed the revised groundwater sampling schedule to allow for USACE QA/QC sample collection at MW-26A (MS/MSD only).

- The USEPA requested clarification regarding GE's pumping rate of 30 mL/minute during initial low-flow sampling activities. The following information presents a summary of the discussions between GE/BBL and USEPA/USACE.

  - On February 11, GE forwarded an e-mail to the USEPA providing the rationale for this approach. Specifically, the e-mail indicated that although the 30 mL/minute pumping rate is lower than the minimum rate of 100 mL/minute referenced in the FSP, this modification is consistent with USEPA Region I low-flow sampling protocol since no minimum pumping rate is specified in the protocol and since

pumping at this reduced rate will minimize (or eliminate) the drawdown within the well. Further, this reduced pumping rate was selected since the goal of low-flow sampling is to eliminate the flow of particulate material into the well and thus the samples collected from the well, and since technological advances in pump designs allow pumping rates as low as 30 mL/min. Also, to ensure sufficient exchange of the volume of water in the flow through cell where certain readings are collected, GE further proposed to collect the readings every 15 minutes rather than the 3 to 5 minutes specified in the Appendix F of the FSP.

- USEPA and USACE agreed that no minimum flow rate is stated in the USEPA Region 1 Low Flow Sampling Guidance. However, it is the opinion of both the USEPA and USACE that the intent of the protocol was to use the maximum pumping rate at which no drawdown of the water table is encountered and that pumping rates less than 100 mL/minute should be reserved for formations that yield very little groundwater (i.e., clay and silt formations). Also, USEPA/USACE expressed concern that samples collected at 30 mL/minute will not yield a representative sample and will underestimate baseline groundwater constituent concentrations since subsurface materials at this site are relatively permeable.

- GE will sample at a higher pumping rate based on the initial information gathered during monitoring well development and specific capacity testing, which indicated that most site wells could be purged at a higher pumping rate without significant drawdown. Appendix F of the December 2003 Field Sampling Plan will be revised and submitted to the USEPA prior to initiating the quarterly groundwater sampling program.

- Pursuant to discussion at this meeting, GE agrees to target a minimum flow rate of 100 mL/minute provided drawdown within the well is minimized in accordance with the USEPA Region 1 Low Flow Sampling Guidance. Flow is not to exceed the flow rate at which each monitoring well was developed (250 mL/minute in most instances). USEPA approves the use of baseline data from upgradient and sentinel monitoring wells where samples have already been collected including MW-05A, MW-05B, MW-25B, MW-25C, MW-10A, MW-10B and MW-10C. All remaining well samples will be collected using target flow rates agreed upon at this meeting. GE will provide additional justification if a pumping rate outside the range specified above is proposed for future sampling events.

Phase 2 Soil Sampling Program:

- Soil samples were collected from soil boring locations E-04, E-06, G-06, I-06, I-08, K-08, K-10, K-16, L-12, L-14, M-10, M-12, M-16, M-18 and O-16 at Elm Street. Soil boring I-06 was split with USACE. All soil borings proposed for the Elm Street Site in the PDWP are now complete.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
February 12, 2004

3. Summary of Near-Term Tasks (BBL)

Phase 2 Monitoring Well Sampling Program:

- Groundwater sampling will continue as scheduled. BBL will inform USEPA and USACE of schedule changes.

Phase 2 Soil Boring Program:

- GE has proposed to collect soil samples at certain supplemental soil boring locations in between the railroad tracks adjacent to the Mill Street site. These supplemental locations will be used to help delineate elevated concentrations of PCBs at C-07 and C-13, among others. A railroad flagman is scheduled to be onsite during groundwater sampling and soil sampling activities February 12, 13, and 17 through 20. GE has presented a table with proposed additional sample locations to the USEPA.

- USEPA approves the supplemental soil boring locations provided they are completed to bedrock at locations B-07, B-11, B-13, B-15, B-17, C-06, C-08, C-12, C-14, D-07, and D-13. The proposed soil boring at location B-09 may or may not be installed pending subsurface data from MW-22/C-09. At soil boring B-01, samples will be collected from 9 to 15 and 21 to 27 feet below grade as proposed in the aforementioned table. Both GE and the USEPA recognize that these samples are being collected to take advantage of current logistics with BBL field personnel and access with the Railroad. The USEPA is aware that GE is not committing to moving forward with this approach (i.e., collection of samples to bedrock) for all future supplemental soil borings and that any proposed delineation as per the PDWP will require closer examination of new and pending analytical and geologic data.

4. Schedule for Future Project Status Meetings (BBL)

Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 7486861 available for those unable to physically attend).

5. Other Miscellaneous Topics/Questions and Answers

Due to current weather conditions GE proposed to postpone the installation of the staff gauge in the Souhegan River for the spring.

6. Update on Status of Agency Comments or Approval Items

- USEPA has approved the modifications to the low-flow sampling procedure as detailed in Section 2 above. BBL will revise Appendix F of the December 2003 Field Sampling Plan accordingly and submit for EPA approval.

- USEPA has approved the concept of performing supplemental soil sampling along the railroad at the Mill Street site as stated above in Section 3.

- USEPA approved postponing the installation of the staff gauge in the Souhegan River until spring.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
February 19, 2004

<u>11 AM – Site Trailer</u>

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager); Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager)
- USACE: David Lubianez (USACE Field Oversight)
- Town of Milford: Tom Neforas (Town of Milford DPW)
- Aries Engineering: Katy Carlson (Chemical Engineer)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Monitoring Well Sampling Program:

- Groundwater sampling activities were initiated on Monday, February 9, 2004. Groundwater samples have been collected at MW-01A, MW-01B, MW-05A, MW-05B, MW-10A, MW-10B, MW-10C, MW-11A, MW-11B, MW-23A, MW-23B, MW-23C, MW-24A, MW-24B, MW-24C, MW-25B, MW-25C. USEPA split samples have been collected at MW-23A, MW-23B, and MW-23C. BBL continues to coordinate with USEPA and USACE to revise sample collection schedule on an as need basis.

- Due to the height of the water column at monitoring wells MW-01B and MW-24B (Note for PDR –After thorough review of groundwater sampling logs the correction should be made that it was MW-24B that was sampled as such, not MW-23B as reported in February 19, 2004 minutes sent to project members), minor field deviations to the procedures specified in Appendix F of the Field Sampling Plan (FSP) were made during low-flow purging and sampling activities at these wells. Specifically the bladder pump was completely submerged to avoid any sediment or air from entering the bladder. This resulted in the intake of the bladder pump being located less than the 2 feet above the bottom of the well, which is the minimum distance specified in Appendix F of the FSP.

Phase 2 Soil Sampling Program:

- Soil samples were collected from supplemental soil boring locations B-13, B-15, B-17, C-06, C-08, C-12, C-14, D-07, and D-13 at the Mill Street Site.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
February 19, 2004

3. Summary of Near-Term Tasks (BBL)

Phase 2 Monitoring Well Sampling Program:

- Groundwater sampling will continue as scheduled. BBL will continue to coordinate with USEPA and USACE on schedule changes.

Phase 2 Soil Boring Program:

- GE to complete proposed supplemental soil boring B-09 to 14 feet below grade as per discussion with USEPA.

- No further soil sampling is proposed during the current field mobilization.

4. Schedule for Future Project Status Meetings (BBL)

- Based on the lack of field activities after this week (i.e., no soil sampling activities and low-flow sampling of monitoring wells will be winding down), next week's project status meetings will be changed to a conference call on Thursday, February 26 at 11:00 AM (call-in number 866 606-4717, access code 7486861). Future meetings/conference calls will be held as warranted by the level of field investigations/activities at the Site. GE will continue to provide agendas in advance of such meetings/calls.

- GE proposed a data review meeting with representatives of EPA and the Town of Milford to discuss the results of the soil sampling activities performed to date and propose additional delineation sampling activities. Based on an estimated completion date of February 20, 2004 for the supplemental soil borings within the rail bed, GE proposed a date of March 24 or 25, 2004 for the data review meeting. This would allow sufficient time to ship the samples to the lab, perform the required analyses, receive and review the data, and prepare the necessary discussion materials for distribution to representatives of the EPA and Town of Milford. GE will contact project members regarding proposed scheduling.

5. Other Miscellaneous Topics/Questions and Answers

- In light of the progress made during this winter mobilization, GE requests that the scheduled remobilization for the remainder of the Phase 2 investigation activities be moved to two weeks following EPA approval of the proposed delineation soil sampling activities. These activities will be discussed with representatives of the EPA and Town of Milford on March 24 or 25, 2004.

- GE plans to move forward with waste characterization of soil and water generated during this mobilization.

6. Update on Status of Agency Comments or Approval Items

USEPA approves the installation of proposed supplemental soil boring B-09 to a depth of 14 feet below grade.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes for Phase 2 Pre-Design Investigation Progress Meeting
February 26, 2004

11 AM – Conference Call

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager)
- Town of Milford: Katie Chambers (Town of Milford Administrator)
- Aries Engineering: Katy Carlson (Chemical Engineer)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Monitoring Well Sampling Program:

- Groundwater sampling activities were initiated on Monday, February 9, 2004. To date, groundwater samples have been collected from the following wells: MW-01A, MW-01B, MW-02AR, MW-02B, MW-03A, MW-03B, MW-04A, MW-04B, MW-04C, MW-05A, MW-05B, MW-07A, MW-08A, MW-08B, MW-09A, MW-09B, MW-10A, MW-10B, MW-10C, MW-11A, MW-11B, MW-21C, MW-22A, MW-22B, MW-22C, MW-23A, MW-23B, MW-23C, MW-24A, MW-24B, MW-24C, MW-25B, MW-25C, MW-26A, MW-26B, MW-27A, MW-27B, MW-28A, MW-28B, MW-29B.

- USEPA split samples have been collected from the following wells: MW-02AR, MW-02B, MW-03A, MW-03B, MW-04A, MW-04B, MW-04C, MW-07A, MW-22A, MW-22B, MW-22C, MW-23A, MW-23B, MW-23C, MW-26A, MW-26B, MW-28A, and MW-28B.

Phase 2 Soil Sampling Program:

- Soil samples were collected from supplemental soil boring locations B-01, B-07, B-09, and B-11 at the Mill Street Site. All proposed soil sampling for this mobilization has been completed and the field crew was demobilized on February 19, 2004.

3. Summary of Near-Term Tasks (BBL)

Phase 2 Monitoring Well Sampling Program:

- Groundwater sampling activities performed today included the collection of groundwater samples at MW-07A and MW-21C. All groundwater sampling has now been completed in accordance with the PDWP.

- Elevation monitoring will continue on a monthly basis. The next monthly elevation monitoring event is tentatively scheduled for March 17, 2004.

4. Summary of Near-Term Tasks (BBL) (continued)

Phase 2 Soil Sampling Program:

- Supplemental soil sampling activities will be proposed at the data review meeting on March 25, 2004.

Waste Characterization:

- GE has initiated waste characterization activities (i.e., providing analytical data from the Phase 2 investigation program to the waste broker to determine the need for additional waste characterization sampling activities) for the investigation-derived waste (IDW) generated to date. Future activities will include waste characterization sampling (if necessary) and waste removal activities. Additional details will be provided at a future date.

5. Schedule for Future Project Status Meetings (BBL)

- Based on completion of the majority of the Phase 2 pre-design investigations proposed in the PDWP (as well as the supplemental investigations along the B-grid line at the Mill Street Site), there will be no project status meeting next week. Future meetings/conference calls will be held as warranted by the level of field investigations/activities at the Site. GE will continue to provide agendas in advance of such meetings/calls.

- GE proposed a data review meeting on March 24 or 25, 2004 with representatives of EPA and the Town of Milford to discuss the results of the soil sampling activities performed to date and propose additional delineation sampling activities. As requested by EPA, the initial meeting will be a technical meeting between GE and EPA representatives on March 25, 2004 at EPA offices in Chelmsford, MA. A second meeting will then be conducted with GE, EPA, and Town of Milford representatives to summarize delineation sampling activities and discuss logistics. GE will furnish the Town of Milford and Aries Engineering with copies of the discussion materials prior to the March 25, 2004 data review meeting.

6. Other Miscellaneous Topics/Questions and Answers

- All field personnel will be off site as of today until further notice. Any project related material or valuables should be removed from the trailer and site. The Town of Milford Police Department has been made aware that field personnel are demobilizing until mid-March (for 1 day) and mid-April. BBL will also contact the Town of Milford Communications Center. In case of emergency after hours, Leanne Roulier may be reached at (315) 382-3558.

6. Other Miscellaneous Topics/Questions and Answers (continued)

- EPA expects to receive analytical data from split soil sampling by March 17th and will forward data to GE.

7. Update on Status of Agency Comments or Approval Items

- In light of the progress made during this winter mobilization, GE has requested that the scheduled remobilization for the remainder of the Phase 2 investigation activities be moved to two weeks following EPA approval of the proposed delineation soil sampling activities. EPA has provided verbal approval of this proposed schedule and will provide the written approval in the near-future.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
April 15, 2004

<u>11 AM – Site Trailer</u>

1. Participants

- GE: Lewis Streeter (GE Project Manager), Jonathan Klein (GE Public Relations)
- BBL: Corey Averill (BBL Project Manager), Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager)
- Town of Milford: Katie Chambers (Town of Milford Administrator), William Ruoff (Town of Milford DPW), Thomas Neforas (Town of Milford DPW)
- Aries Engineering: Tom Roy (Environmental Consultant for Town of Milford), Katy Carlson (Chemical Engineer)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Surface Soil Sampling Program:

- BBL's field crew remobilized to the site on April 12, 2004 to complete the surface soil sampling proposed in the November 2003 PDWP (along the riverbank and in the back corner of the Elm Street Area, adjacent to the cemetery) and to begin the delineation surface soil sampling program as approved in EPA's March 31, 2004 letter. Surface soil sampling activities were initiated on Wednesday, April 14, 2004 along the riverbank. Surface soil samples collected on April 14 and 15 include D05, D06, E00, E07, F05, F06, G07, G08, H07, H08, H18, H19, I09, I11, I19, J10, J11, J15, J16, J19, K11, K12, K17, K19, L19, and M19.

- Dig Safe clearance was initiated on April 14, 2004 for the Elm Street and Mill Street sample locations that are located within each street. BBL forwarded Dig Safe information to the Town of Milford DPW for additional utility clearance.

Phase 2 Subsurface Sampling Program:

- GE/BBL submitted revised subsurface delineation sampling figures and tables on April 2, 2004, and with the exception of the sampling in Elm and Mill Streets (see Section 6 for more details), EPA has not approved the proposed sampling locations. It was noted that BBL will be prepared to begin subsurface sampling by May 3 and therefore EPA approval was needed prior to that date.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
April 15, 2004

3. Summary of Near-Term Tasks (BBL)

Phase 2 Surface Soil Sampling Program:

- Sampling activities will continue along the riverbank this week. Next week survey and soil sampling activities will commence in areas along the access road to Keyes Park, and at the Elm Street and Mill Street Areas.

- BBL will continue to coordinate with the Town to determine the access and sampling procedures for EPA-requested surface soil sampling in the cemetery along the drainage swale. Katie Chambers has been in contact with the Cemetery Trustee regarding soil sampling in the cemetery. Although there are no specific procedures in place for subsurface work at the cemetery, the Town would like to have the cemetery foreman present during sample activities.

Phase 2 Elevation Monitoring Program:

- Groundwater elevation monitoring will continue on a monthly basis. The date for the next monthly elevation monitoring is tentatively scheduled for April 19, 2004.

Waste Characterization:

- GE has initiated waste characterization activities (i.e., providing analytical data from the Phase 2 investigation program to the waste broker to determine the need for additional waste characterization sampling activities) for the investigation-derived waste (IDW) generated to date. Future activities will include waste characterization sampling (if necessary) and waste removal activities. Additional details will be provided at a future date.

4. Schedule for Future Project Status Meetings (BBL)

Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 1747915 available for those unable to physically attend).

5. Other Miscellaneous Topics/Questions and Answers

See Update on Status of Agency Comments or Approval Items.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
April 15, 2004

6. Update on Status of Agency Comments or Approval Items

- EPA provided some verbal comments with respect to GE's April 12, 2004 submittal to EPA (response to EPA's March 31, 2004 approval letter). These comments related to the use of a subsurface cleanup level (SCL) of 1 ppm for soils associated with sample location H03. Specifically, the April 12 response to EPA's March 31 letter indicated GE's/BBL's assumption that the EPA's request to analyze the 2- to 3-foot sample at this location if the 1- to 2-foot sample contained PCBs at a concentration greater than 1 ppm was a typographical error. However, EPA clarified their request by indicating that a subsurface cleanup level of 1 ppm for this sample would be appropriate. GE/BBL will collect, extract and analyze the 1-2' interval and collect, extract and hold the 2-3' interval at location H03. The 2-3' interval will be analyzed if the 1-2' interval exceeds 1 ppm for PCBs.

- EPA indicated that additional comments regarding GE's response to EPA's March 31, 2004 approval letter would be forthcoming. On a related topic, GE requested and received approval for the subsurface delineation sample locations proposed within Mill Street and Elm Street, (contained in the April 2, submittal) so that all sampling within the streets is performed in one event and disruptions to local traffic are minimized. The approved subsurface delineation sample locations and depth on sample collection in Mill Street include: EB-13S and EB-13SS to a depth of 18.5 feet; E13S and E13SS to a depth of 15 feet; E15S to a depth of 5 feet; and E14SE and E14SW to a depth of 3 feet. The approved subsurface delineation locations in Elm Street and depth of sample location include S11, S11W, S11WW, S11S, and S11SS to a depth of 3 feet.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
April 22, 2004

11 AM – Site Trailer

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager), Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager)
- Town of Milford: Katie Chambers (Town of Milford Administrator), William Ruoff (Town of Milford DPW)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Surface Soil Sampling Program:

Elm Street Area

- Surface soil samples have been collected from sample locations D05, D06, E00, E07, F05, F06, G07, G08, H07, H08, H18, H19, I09, I11, I19, J10, J11, J13, J14, J15, J16, J19, K11, K12, K13, K14, K17, K19, L13, L19, M19, R09W, R09S, R09SS, R10S, S12S, S12SS, S13S, S13SS, S14S, S14SS, T20S, T20SS, T21.

- Subsurface delineation samples have been collected from sample locations S11E, S11W, S11WW, S11N, S11S, and S11SS.

Mill Street Area

- Surface soil samples have been collected from sample locations B13W, B13N, B13E, B17N, C14N, C17NE, C18N, and C20N.

Phase 2 Elevation Monitoring Program:

- The third round of groundwater elevation monitoring was completed on April 19 and 20, 2004. Elevation monitoring will continue on a monthly basis until February 2003.

- A stream gauge (SG-1) has also been installed in the Souhegan River at the Elm Street site and has been surveyed.

3. Summary of Near-Term Tasks (BBL)

Phase 2 Surface Soil Sampling Program:

- Survey of approved surficial and select subsurface delineation locations is ongoing.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
April 22, 2004

3. Summary of Near-Term Tasks (BBL) (continued)

- Certain surface soil sample locations at the base of the riverbank (e.g., D07, F07, G09, H09, H10, I10) remain under water. BBL field personnel are monitoring the elevation of the river as it pertains to these sample locations and will collect the samples as conditions permit.

- Surface soil sampling in the cemetery along the drainage swale is scheduled for this Friday, April 23, 2004. The cemetery foreman from the Town of Milford will be present during sampling activities.

Phase 2 Elevation Monitoring Program:

- At the request of EPA, BBL did not conduct additional activities to investigate the presence of NAPL at monitoring well MW-21C during the April 2004 monthly elevation monitoring event.

  - Two methods of NAPL sample collection at monitoring well MW-21C were discussed. BBL/GE suggested using a peristaltic pump and evacuating any potential DNAPL from the base of the well directly into lab supplied certified clean glassware. The EPA suggested the use of a hydrophobic tape that can be left in the well for an extended period of time to detect and absorb LNAPL or DNAPL. BBL will follow up with the USACE to further discuss NAPL sample collection options. Once an approach is agreed upon, GE/BBL will submit detailed procedures for potential NAPL sample collection to the EPA prior to initiating this task.

  - Should a sufficient volume of pure NAPL be collected, EPA requests analysis for PCBs and, if possible, VOCs.

4. Schedule for Future Project Status Meetings (BBL)

Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 1747915 available for those unable to physically attend).

5. Other Miscellaneous Topics/Questions and Answers

- At this time, BBL/GE requests that those planning to be present for test pitting activities confirm their availability for the weeks of May 3 and 10.

5. Other Miscellaneous Topics/Questions and Answers (continued)

- The last day of school for the Milford school district is June 18. GE/BBL plan to have test-pitting activities completed prior to this date. BBL will contact Kevin Tiska (Recreation Director for the Town of Milford) regarding any daytime (7AM to 2PM) activities at Keyes Park prior to the end of the school year.

6. Update on Status of Agency Comments or Approval Items

- GE/BBL will complete the approved surface soil sampling activities by April 29, 2004 and will be prepared to initiate subsurface delineation sampling activities on May 3, 2004. EPA estimates that approval of the subsurface sampling program (or a portion thereof) will be provided the week of April 26.

- (The following summary was inadvertently omitted from the minutes for the April 15 meeting). During the weekly status meeting on April 15, there was a discussion regarding the timing for identification of the location of the future utility corridor at the Elm Street Area. The EPA stated that the schedule for submittal of the PDI report is not contingent upon the Town identifying the location of the utility corridor. However, GE/BBL stated that if the selected location is identified during ongoing pre-design investigation activities, additional samples could be collected to determine the need for remedial actions to achieve the ROD-specified Soil Cleanup Level (SCL) of 25 ppm for subsurface soils within the utility corridor. If the location of the corridor is not identified until after submittal of the PDI report, additional delineation sampling activities may be required should insufficient data exist to determine whether the soils in the proposed utility corridor exceed the SCL of 25ppm.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
April 29, 2004

11 AM – Site Trailer

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager), Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager)
- Town of Milford: Katie Chambers (Town of Milford Administrator)
- Aries Engineering: Katy Carlson (Chemical Engineer)
- NHDES: Tom Andrews (NHDES Project Manager)
- USACE: Scott Acone (USACE Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Surface Soil Sampling Program:

Elm Street Area

- All surface soil samples located at the base of the riverbank that were under water (e.g., D07, F07, G09, H09, H10, I10) have been collected and are included in the list below.

- Surface soil sampling in the cemetery along the drainage swale was performed Friday, April 23, 2004. The cemetery foreman from the Town of Milford was present during sampling activities. Sampling activities were conducted without incident.

- Surface soil samples have been collected from sample locations A04, B05, C05, D05, D06, D07, E00, E02NE, E02W, E07, F00, F01, F05, F06, F07, G04NW, G07, G08, G09, H02W, H03NW, H03SE, H03SW, H05S, H07, H08, H09, H10, H17, H18, H19, I09, I10, I11, I15, I16, I17, I18, I19, J06, J10, J11, J12, J13, J14, J15, J16, J17, J19, K07W, K08SW, K11, K12, K13, K14, K17, K19, L13, L19, M08W, M19, N08, N09, N19, O09, P09, Q09W, R09W, R09S, R09SS, R10S, R18E, R19N, R20N, R21N, R22N, S11E, S11N, S11S, S11SS, S11W, S11WW, S12S, S12SS, S13S, S13SS, S14S, S14SS, SS-16NE, SS-16NW, SS-16SE, SS-16SW, SS-18E, SS-25NE, SS-25NW, SS-25SE, SS-25SW, T20S, T20SS, and T21.

- Subsurface delineation samples have been collected from sample locations H03, L15, P17, S11, S11E, S11N, S11S, S11SS, S11W, S11WW, SS-15, SS-19, SS-20, SS-21, and SS-38.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
April 29, 2004

2. Summary of Tasks Performed During Previous Week (BBL) (continued)

Mill Street Area

- Surface soil samples have been collected from sample locations B13E, B13N, B13W, B17N, C05N, C14N, C17NE, C18N, C20E, C20N, C20S, C20SE, C20SS, D04NE, D04SW, D17SW, E13S, E13SS, E14SE, E14SW, E15S, E16, EB-13S, EB-13SS, F06SW, F07SW, F08SW, F09SW, F10SW, SF-04G-1SW, SS-12E, SS-12S, SS-12SE, SS-13NE, SS-13SE, and SS-13SW.

- Subsurface delineation samples have been collected from sample locations C16, C18, C20, D04, D05, D10, E13S, E13SS, E14, E14SE, E14SW, E15S, EB-13S, EB-13SS, F06, F08, F10, SF04G-1, SS-05, SS-12, SS-13, and SS-14.

- It is anticipated that all approved surface and select subsurface sampling locations will be completed today (April 29, 2004) with the exception of select surface sampling locations that are co-located with proposed subsurface soil borings. These samples will be collected subsequent to approval for the subsurface delineation borings. These locations include SS-17, SS-26, K08S, K08W, and O18E at Elm Street and locations E05S, E05W, C10, D06, D08, D09, D11, D15, E12, F09, SF-01g-1 and SS-12(ESE) at Mill Street.

- Survey of approved surficial and select subsurface delineation locations is complete.

Phase 2 Elevation Monitoring Program:

- An additional stream gauge (SG-2) was installed as a contingent gauging location in the Souhegan River at the Elm Street site in the event that SG-1 is destroyed.

- At the request of EPA, GE/BBL did not conduct additional activities to investigate the presence of NAPL at monitoring well MW-21C during the April 2004 monthly elevation monitoring event. BBL has contacted USACE to discuss alternative methodologies for NAPL collection and investigation. GE/BBL will submit detailed procedures for potential NAPL sample collection to the EPA prior to initiating this task.

3. Summary of Near Term Tasks (BBL)

- The tentative date for installation of test pits has been changed to the week of May 17. BBL has been in contact Kevin Tiska (Recreation Director for the Town of Milford) regarding any daytime (7AM to 2PM) activities at Keyes Park prior to the end of the school year. Currently there are no activities scheduled. BBL will contact Kevin Tiska once test-pitting activities have been scheduled to confirm the park activity schedule.

3. Summary of Near Term Tasks (BBL) (continued)

- BBL is arranging for the transportation and off-site disposal of all IDW (e.g., soil cuttings, well development water, PPE, etc.) currently staged at the Elm Street Site.

- BBL is preparing a DNAPL sample collection procedure for EPA review and approval. Following receipt of such approval, BBL will attempt to collect a DNAPL sample from MW-21C.

- BBL will conduct the fourth monthly elevation monitoring event during the third week of May 2004.

- The next quarterly low-flow sampling event should take place in May 2004. Following receipt of EPA comments and/or approval of the June 2003 revised draft Surface Water and Groundwater Monitoring Plan, GE/BBL will finalize the Plan and schedule the next quarterly monitoring event.

- Upon receipt of EPA approval of the subsurface delineation soil sampling proposal, BBL will initiate the next round of delineation soil sampling activities at the Site.

4. Schedule for Future Project Status Meetings

Based on the anticipated completion of the approved surface and select subsurface soil sampling activities today, there will be no project status meeting next week. Future meetings/conference calls will be held as warranted by the level of field investigations/activities at the Site. GE will continue to provide agendas in advance of such meetings/calls.

5. Other Miscellaneous Topics/Discussions

None.

6. Update on Status of Agency Comments or Approval Items

EPA verbally approved certain of the proposed Mill Street subsurface delineation soil sampling locations and will provide comments on the remainder of the locations at the Mill Street Site by Wednesday May 5, 2004. For logistical purposes (i.e., minimizing the potential for work stoppage between completion of the approved sampling and receipt of EPA approval for the remainder of the sampling activities), GE/BBL requested, and EPA agreed, that remobilization to the Site would not occur until the EPA provided final approval of proposed subsurface delineation soil sampling locations. GE/BBL will provide EPA with a revised figure showing all approved subsurface delineation sample locations subsequent to receiving final approval and prior to remobilizing to the Site.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
May 20, 2004

11 AM – Site Trailer

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager), Leanne Roulier (BBL Field Team Leader)
- USEPA: Cheryl Sprague (EPA Project Manager), Mike Jasinski (Chief NH/RI Superfund Section)
- Aries Engineering: Katy Carlson

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Test-Pitting Program

- BBL has completed test-pitting activities in accordance with the November 2003 Pre-Design Work Plan (PDWP). The proposed test pit locations were identified to achieve the following objectives:

  - Investigate subsurface anomalies identified during the geophysical investigations (the selected locations also incorporate recommendations provided by EPA in their comments on the PDWP);
  - Collect samples for the performance of the thermal treatability study;
  - Collect geophysical samples to assist with the design of the excavation controls;
  - Identify untreatable materials and collect waste characterization samples.

Elm Street Area

- Test pits were excavated in the vicinity of the following locations: Grid location M-08 (TP #1), EB-04/MW-04 (TP #2), EB-03/MW-03 (TP #3), grid location O-18, and grid location O-14. A brief summary of test-pitting activities at each location (including observed materials and collected samples) is provided below.

  - TP#1 – Main Objective: Investigate subsurface anomaly. Three test pits were completed at this location. Soils consisted of brown, fine to medium sand with some large boulders and quarried granite. No subsurface metals were discovered.

  - TP#2 – Main Objective: Investigate subsurface anomalies. Three test pits were completed at this location. Soils consisted of brown, fine to medium sand with some boulders, cobbles, quarried granite block, trace brick. The first two test pits were abandoned after finding several large pieces of quarried granite (measuring approximately 4' x 3' x 2'). These stones were left in place due to their proximity to monitoring wells MW-04A, MW-04B, and MW-04C. The third test pit at this location consisted of similar soils, fill material and a mixer propeller attached to a 1.5-inch diameter rod that was discovered less than two feet below the cap.

2. Summary of Tasks Performed During Previous Week (BBL) (continued)

- TP#3 – Main Objective: Investigate subsurface anomalies and collect waste characterization samples (including resinous material at EB-03A). Two test pits were completed at this location. Soils consisted of fine to medium sand with some gravel and little cobbles. Soils were stained in pockets of variable thickness (2 to 5 inches thick) with paint-like materials (gray, yellow, pink). Two drums were located and left in place. The first drum (Drum A) appeared to be constructed of a non-metal material with a metal lid and rim. A clear yellow resinous material that appeared to be similar to hardened polyurethane was found immediately adjacent to or within the top of Drum A. The backhoe operator reported that he felt a void near Drum A. This coincides with the low blow counts and non-recovery at EPA soil boring EB-03A. The second drum (Drum B) was constructed of metal that was highly corroded. The contents of this drum were exposed in the test pit and appeared to be a separated paint-like material that was red, black and white. Composite soil samples were collected for the thermal treatability study. Samples were collected from the paint-like materials and the clear yellow resinous material for waste characterization analyses.

- TP#4 – Main Objective: Collect soil sample for waste characterization and the thermal treatability study. One test pit was completed at this location. Soil consisted of fine to medium sand, trace gravel, and silt. A lens of black-stained soil that was very cohesive was observed from 2.5 to 3 feet below the cap (FID reading of 2.0 ppm). Composite soil samples were collected for waste characterization and the thermal treatability study.

- TP#5 – Main Objective: Collect soil samples for waste characterization and the thermal treatability study. One test pit was completed at this location. Soil consisted of fine to medium sand and gravel, trace cobbles and black, coal-like staining (0 to 1 feet below the cap). Material from what appeared to be a burning pit was observed from 5.5 to 7 feet below the cap. These materials consisted of a mixture of slag, cinders, pottery, and glass jars of various shapes and sizes. Composite soil samples were collected for waste characterization and the thermal treatability study.

- A composite soil sample from test pits TP#3, TP#4 and TP#5 was collected for geotechnical analyses to assist with the design of the excavation controls.

<u>Mill Street Area</u>

- Test pits were excavated in the vicinity of the following locations: south of MW-22 cluster, MW-21C, and grid location D13. A brief summary of test-pitting activities at each location (including observed materials and collected samples) is provided below.

  - TP#1 – Main Objective: Investigate subsurface anomaly and collect soil samples for waste characterization and the thermal treatability study. One test pit was completed at this location. Soil consisted of fine to medium sand with trace weathered concrete. A section of concrete footing approximately two feet in thickness and a 3-inch thick floor slab were observed at this location. The 3-inch slab extended beyond the proposed test pit area. The limits of the slab were roughly delineated and marked in the field for future survey. Composite soil samples were collected for waste characterization and the thermal treatability study.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
May 20, 2004

2. Summary of Tasks Performed During Previous Week (BBL) (continued)

- TP#2 – Main Objective: Investigate subsurface anomaly and collect soil samples for waste characterization and the thermal treatability study. One test pit was completed at this location. Soil consisted of fine to medium sand and silt to approximately 2.5 feet below grade. A very dark brown, fine to medium sand with trace silt and a slight odor was observed from approximately 2.5 to 4' below grade (FID=15 ppm). A rusty orange-brown medium sand with a slight odor and trace sheen on the soils was observed from 4 to 5' bgs (FID=26 ppm, shake test=negative). No subsurface metals were discovered. Composite soil samples were collected for waste characterization and the treatability study.

- TP#3 – Main Objective: Collect soil samples for waste characterization and treatability study. One test pit was completed at this location. Soil consisted of fine to medium sand with little silt to 2.2' below grade. A very dark brown fine to medium sand with trace silt and a slight odor was observed from 2.2 to 3.2' below grade (FID=89 ppm, shake test=negative). A rust-colored, orange-brown medium sand with a slight odor, no sheen was observed from 4 to 5' bgs (FID reading of 4.5 ppm). Two small metal objects (folded bands of metal) were discovered from 3 to 4 feet and from 5 to 6 feet below grade. Composite soil samples were collected for waste characterization and the thermal treatability study.

- A composite soil sample from test pits TP#1, TP#2, and TP#3 was collected for geotechnical analyses to assist with the design of the excavation controls.

3. Summary of Near Term Tasks (BBL)

BBL will perform the next round of groundwater elevation monitoring on Friday, May 21, 2004. In addition, pending EPA approval of the proposed NAPL sampling procedures, BBL will attempt to collect a NAPL sample from MW-21C.

4. Schedule for Future Project Status Meetings

Based on the completion of the test-pitting activities today, there will be no project status meeting next week. Future meetings/conference calls will be held as warranted by the level of field investigations/activities at the Site. GE will continue to provide agendas in advance of such meetings/calls.

5. Update on Status of Agency Comments or Approval Items

GE/BBL anticipates receipt of EPA approval of the Mill Street subsurface sampling program on Friday, May 21, 2004 and the Elm Street subsurface sampling program the week of May 24. Following receipt of EPA approval, BBL will mobilize to the site and complete the proposed investigations.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
July 1, 2004

11 AM – Site Trailer

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager), Leanne Roulier (BBL Field Team Leader)
- EPA: Cheryl Sprague (EPA Project Manager)
- Town of Milford: Thomas Neforas (Town of Milford DPW)
- Aries Engineering: Tom Roy (Environmental Consultant for Town of Milford), Katy Carlson (Chemical Engineer)
- USACE: David Lubianez (USACE Field Oversight)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Groundwater Elevation Monitoring Program:

- Monthly elevation monitoring was conducted on June 23, 2004.

Phase 2 Test Pitting Activities:

- Survey of test pits installed from May 17 to 19 is complete.

Phase 2 Soil Sampling Program:

- Investigative derived waste (IDW) from the winter and spring mobilizations was transported offsite for disposal on June 22 and 23, 2004.

- The 6,000 gallon poly tank used for IDW water during the winter and spring mobilizations has been emptied and deconned. Pick up of the tank has been scheduled.

Mill Street Area

- Dig safe clearance was initiated on June 23, 2004 for the Mill Street sample locations.

- Survey of approved subsurface delineation locations at the Mill Street site is complete.

- Subsurface delineation samples have been collected from sample locations EB-07A, EB-12, EB-13, and EB-14.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
July 1, 2004

3. Summary of Near Term Tasks (BBL)

Phase 2 Surface Soil Sampling Program:

Mill Street Area

- Surface and Subsurface Soil Sampling activities will continue at the Mill Street site next week.

- GE will install subsurface borings approved in the June 14, 2004 letter from EPA.

- GE requests approval to install the following 8 soil borings that are located between approximately 7 to 10 feet away from the EPA-approved grid locations referenced in the June 14, 2004 letter: C08N, C13N, C07E, D13E, E09W, SS-12(ESE), and C11N.

Phase 2 Groundwater Elevation Monitoring Program:

- Groundwater elevation monitoring will continue on a monthly basis. The next date for monthly elevation monitoring is tentatively scheduled for July 19, 2004.

- At the request of EPA, GE/BBL has not been conducting additional activities to investigate the presence of NAPL at monitoring well MW-21C. GE/BBL submitted detailed procedures for potential NAPL sample collection to the EPA on June 2, 2004 for approval.

4. Schedule for Future Project Status Meetings

Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 1747915 available for those unable to physically attend).

5. Other Miscellaneous Topics/Discussions

- GE/BBL has installed temporary fencing along the base of the riverbank adjacent to the Elm Street site to restrict public access.

- EPA said that a letter with comments regarding GE's sample validation package is forthcoming. GE requested a conference call with EPA to discuss validation issues once the comments have been received.

- The annual Town of Milford swim meet is scheduled for July 16. BBL will contact Kevin Tiska, Town Recreation Director, regarding the event schedule.

5. Other Miscellaneous Topics/Discussions (Continued)

- GE and EPA discussed at length, the additional soil boring locations that were proposed by GE (in an April 2, 2004 submittal) and not approved by EPA for the Mill Street site. EPA will not approve additional soil boring locations and said there was no reason to conduct a call or meeting to discuss or review these locations. GE stated that the proposed boring locations were consistent with the intent of the PDI work plan and data from these locations would assist in further delineating the soil that exceeds the Soil Cleanup Levels. The EPA stated that GE could install additional borings but the schedule for submission of the PDI report would not be extended as a result of the installation of any borings not specifically approved by the EPA.

6. Update on Status of Agency Comments or Approval Items

- GE/BBL estimate completion of the approved Mill Street subsurface soil sampling activities by July 14, 2004 and will be prepared to initiate additional subsurface delineation sampling activities on July 15, 2004. Approval of the subsurface sampling program for the Elm Street Site is forthcoming, along with a new date for submission of the PDI Report.

- GE requested and received approval to install soil borings C07E, E09W, and SS-12(ESE) at the locations proposed on March 25, 2004.

- Per EPA, soil borings C08N (C-8), C13N (C-13) D13E (D14), C11N (C11) will be relocated to the grid location (shown in parenthesis) that was referenced in the June 14, 2004 letter from EPA.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
July 8, 2004

11 AM – Site Trailer

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager), Leanne Roulier (BBL Field Team Leader)
- Town of Milford: Thomas Neforas (Town of Milford DPW)
- Aries Engineering: Tom Roy (Environmental Consultant for Town of Milford)
- NHDES: Tom Andrews (NHDES Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Soil Sampling Program:

- The 6,000 gallon poly tank used for IDW water during the winter and spring mobilizations has been removed from the site.

Mill Street Area

- Subsurface delineation samples have been collected from sample locations B18, B19, B20, B21, C11N, C13N, D04SW, D08, D11, D13E, D15, E09W, E12, EB-07A, EB-12, EB-13, EB-14, EB-21C, and F09.

- Difficulty with refusal at C13N and D13E caused these locations to be relocated within 3.5 feet and 1 foot, respectively, of the proposed locations.

3. Summary of Near Term Tasks (BBL)

Phase 2 Surface Soil Sampling Program:

Mill Street Area

- GE/BBL estimate completion of the approved Mill Street subsurface soil sampling activities by July 13, 2004.

4. Schedule for Future Project Status Meetings

As indicated above, GE/BBL estimate completion of the approved Mill Street subsurface soil sampling activities by July 13, 2004. Upon receipt of EPA approval of the proposed subsurface sampling program at the Elm Street Site, meetings will continue to be held on Thursdays at 11:00 AM (or 10AM, as appropriate). The July 15 meeting will be at 10:00AM (if held). If held, the meeting will take place via conference call due to the Town of Milford swim meet event taking place at Keyes Park. GE/BBL will notify the project members regarding the status of the next meeting and will continue to provide agendas in advance of such meetings/calls.

5. Other Miscellaneous Topics/Discussions

The annual Town of Milford swim meet is scheduled for July 16. BBL has contacted Kevin Tiska, Town Recreation Director, regarding the event schedule. Set up for the event begins on Wednesday, July 14. Given the size of this event and related construction activities to be conducted at Keyes Park, BBL will demobilize from the site by Thursday July 15 for the week.

6. Update on Status of Agency Comments or Approval Items

GE/BBL estimate completion of the approved Mill Street subsurface soil sampling activities by July 13, 2004 and will be prepared to initiate additional subsurface delineation sampling activities on July 14, 2004. Approval of the subsurface sampling program for the Elm Street Site is forthcoming, along with a new submittal date for the PDI Report.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
July 22, 2004

11 AM – Site Trailer

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager), Leanne Roulier (BBL Field Team Leader)
- Town of Milford: Thomas Neforas (Town of Milford DPW)
- Aries Engineering: Tom Roy (Environmental Consultant for Town of Milford)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Groundwater Elevation Monitoring Program:

- Monthly elevation monitoring was conducted on July 13, 2004.

- At the request of EPA, GE/BBL has not been conducting additional activities to investigate the presence of NAPL at monitoring well MW-21C. GE/BBL submitted detailed procedures for potential NAPL sample collection to the EPA on June 2, 2004 for approval.

Phase 2 Soil Sampling Program:

Mill Street Area – Week of July 12

- Subsurface delineation samples have been collected from proposed and approved sample locations B17N, B18, B19, B20, B21, C06NW, C07E, C07NW, C08N, C10NE, C11N, C12N, C13N, D04SW, D08, D11, D13E, D15, E09W, E12, EB-07A, EB-12, EB-13, EB-14, EB-21C, F09, SF-01G-1, and SS-12(ESE).

- Shallow refusal was encountered at approved soil boring locations C10NE and C13N. Consequently, these soil borings were relocated approximately 5 feet to the north of the approved location.

- GE/BBL completed the approved soil boring locations at the Mill Street site and demobilized from the site on July 13, 2004.

Mill Street Area – Week of July 19

- GE/BBL remobilized to the site on July19 to resume the subsurface soil sampling program at the Mill Street site.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
July 22, 2004

2. Summary of Tasks Performed During Previous Week (BBL) (Continued)

- Subsurface delineation samples have been collected from the following Mill Street sample locations proposed by GE and not approved EPA: C10, D06, D09, E05E, E05N, E05W, E07W, E09, E10, EB-14SW, and F05.

3. Summary of Near Term Tasks (BBL)

Phase 2 Soil Sampling Program:

- GE received comments on the Elm Street subsurface soil sampling program from EPA on July 16, 2004. GE/BBL plan to initiate the Elm Street site subsurface soil boring program once the subsurface soil sampling program at the Mill Street site has been completed.

Phase 2 Groundwater Elevation Monitoring Program:

- Groundwater elevation monitoring will continue on a monthly basis. The next date for monthly elevation monitoring is tentatively scheduled for the week of August 16, 2004.

4. Schedule for Future Project Status Meetings

Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 1747915 available for those unable to physically attend).

5. Other Miscellaneous Topics/Discussions

- Four soil borings at the Mill Street site are located within the street. BBL will discuss a traffic control plan with the Milford Police Department and schedule a detail officer.

- The town received a call from a resident regarding dust generated during subsurface investigations at the Mill Street site. The resident was directed to contact the EPA Project Manager.

6. Update on Status of Agency Comments or Approval Items

As per comments provided by EPA on July 16, 2004, GE/BBL will continue the subsurface soil sampling programs at Mill and Elm Street sites.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
July 29, 2004

11 AM – Site Trailer

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Corey Averill (BBL Project Manager), Leanne Roulier (BBL Field Team Leader)
- NHDES: Tom Andrews (NHDES Project Manager)
- Town of Milford: Tom Neforas (Town of Milford DPW)
- Aries Engineering: Tom Roy (Environmental Consultant to the Town of Milford)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Soil Sampling Program:

Mill Street Area`

- As of July 19, 2004, subsurface delineation samples have been collected from the following Mill Street sample locations: C07W, C10, C11W, C13NE, C17S, D06, D07SE, D07W, D09, E05E, E05N, E05W, E07W, E08, E09N, E10, E13E, E13W, EB13W, E14, E14S, EB-14SW, and F05.

- The installation of soil borings C12W, C12SW, EB-21CW and D13SW are pending results of nearby, recently installed soil borings.

3. Summary of Near Term Tasks (BBL)

Phase 2 Soil Sampling Program:

Mill Street Area

- Based on sample data for recently installed soil borings, GE has elected to add two new soil borings for further delineation in the vicinity of the railroad tracks at the Mill Street area. These borings, B06 and B12, will be installed on the south side of the northern railroad track and will be sampled from 15-25' and 17-23' below grade, respectively. These borings will be installed once a flagman can be scheduled from the railroad.

- A PDF file showing the locations where GE/BBL will be conducting soil sampling at the Mill Street site is attached along with these minutes from the July 29, 2004 weekly status meeting.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
July 29, 2004

3. Summary of Near Term Tasks (BBL) (Continued)

Phase 2 Soil Sampling Program:

Elm Street Area

- GE received comments on the Elm Street subsurface soil sampling program from EPA on July 16, 2004. GE/BBL will be modifying certain proposed soil boring locations based on previous discussions with EPA and comments provided in the July 16 letter. GE/BBL plan to initiate survey and subsurface soil sampling activities for the Elm Street site subsurface soil boring program on Monday, August 2, 2004.

- A PDF file showing the locations where GE/BBL will be conducting soil sampling at the Elm Street site is attached along with these minutes from the July 29, 2004 weekly status meeting.

Phase 2 Groundwater Elevation Monitoring Program

- Groundwater elevation monitoring continues on a monthly basis. The next date for monthly elevation monitoring is tentatively scheduled for the week of August 16, 2004.

4. Schedule for Future Project Status Meetings

Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 1747915 available for those unable to physically attend).

5. Other Miscellaneous Topics/Discussions

6. Update on Status of Agency Comments or Approval Items

As per comments provided by EPA on July 16, 2004, GE/BBL will continue the subsurface soil sampling programs at Mill and Elm Street sites as needed.

EPA clarified that the actual submittal date for the Pre-Design Report is January 16, 2005 via email dated July 29, 2004. EPA will forward an official letter regarding this revision.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
August 05, 2004

11 AM – Site Trailer

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Leanne Roulier (BBL Field Team Leader)
- Town of Milford: Tom Neforas (Town of Milford DPW)
- Aries Engineering: Tom Roy (Environmental Consultant to the Town of Milford)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Soil Sampling Program:

Mill Street Area

- No soil borings were installed at the Mill Street site.

- Additional subsurface delineation locations, B06 and B12, have been surveyed.

Elm Street Area

- Additional subsurface delineation locations have been surveyed.

- Subsurface delineation samples have been collected from the following Elm Street sample locations: H06, J06, K09, L12SW, L14E, L14W, L15E, L15S, SS-15, SS-15E, SS-15S, SS-15W, SS-17, SS-17E, SS-17S, and SS-17W.

3. Summary of Near Term Tasks (BBL)

Phase 2 Soil Sampling Program:

Mill Street Area

- Based on sample data from recently installed soil borings, GE has elected to add two new soil borings for further delineation in the vicinity of the railroad tracks at the Mill Street area. These borings, B06 and B12, will be installed on the south side of the northern railroad track and will be sampled from 15-25' and 17-23' below grade, respectively. Since the distribution of the August 5, 2004 agenda, GE/BBL have elected to add an additional boring for further northern delineation near the railroad tracks. Soil boring B10 will be installed on the south side of the northern railroad track and will be sampled from 1-7' below grade. All three borings will be installed today as a flagman had been scheduled for railroad work this morning.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
August 05, 2004

3. Summary of Near Term Tasks (BBL) (Continued)

Phase 2 Soil Sampling Program:

Mill Street Area

- All previously proposed soil borings have been completed with the exception of soil borings C12W, C12SW, EB-21CW and D13SW. The installation of these soil borings are pending results of nearby, recently installed soil borings.

Elm Street Area

- As per comments provided by EPA on July 16, 2004, GE/BBL will continue the subsurface soil sampling programs at Mill and Elm Street sites as needed.

- GE/BBL anticipates completion of the current soil sampling program the week of August 16, 2004.

Phase 2 Groundwater Elevation Monitoring Program

- Groundwater elevation monitoring continues on a monthly basis. The next date for monthly elevation monitoring is tentatively scheduled for the week of August 16, 2004.

4. Schedule for Future Project Status Meetings

Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 1747915 available for those unable to physically attend).

5. Other Miscellaneous Topics/Discussions

July 29 meeting minutes are forthcoming and will include PDF files showing the current subsurface delineation soil boring locations to be sampled.

6. Update on Status of Agency Comments or Approval Items

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
August 12, 2004

<u>11 AM – Site Trailer</u>

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Leanne Roulier (BBL Field Team Leader)
- Town of Milford: Tom Neforas (Town of Milford DPW)
- Aries Engineering: Tom Roy (Environmental Consultant to the Town of Milford), Katy Carlson (Chemical Engineer)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Soil Sampling Program:

- GE/BBL distributed PDF files containing figures showing current subsurface delineation locations at the Elm and Mill Street sites.

<u>Mill Street Area</u>

- Subsurface delineation samples have been collected from Mill Street sample locations B06, B10 and B12.

<u>Elm Street Area</u>

- Subsurface delineation samples have been collected from the following Elm Street sample locations: EB-15, EB-15SE, EB-15SW, H06, J06, K09, L12SE, L12SW, L14E, L14W, L15E, L15S, O14E, O14W, Q11, Q12E, Q12N, Q14E, Q14W, Q16E, Q16N, Q16W, R12, R14, R16, SS-15, SS-15E, SS-15S, SS-15W, SS-17, SS-17E, SS-17S, SS-17W, and SS-26.

3. Summary of Near Term Tasks (BBL)

Phase 2 Soil Sampling Program:

<u>Mill Street Area</u>

- All previously proposed soil borings have been completed with the exception of soil borings C12W, C12SW, EB-21CW and D13SW. GE/BBL will determine the need to install these soil borings based on a review of the data from soil borings recently installed at nearby locations.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
August 12, 2004

3. Summary of Near Term Tasks (BBL) (continued)

Phase 2 Soil Sampling Program:

Elm Street Area

- As per comments provided by EPA on July 16, 2004, GE/BBL will continue the subsurface soil sampling programs at Mill and Elm Street sites as necessary to delineate the extent of soils containing PCBs at concentrations above the soil cleanup levels.

- GE/BBL have extended the anticipated date of completion of the current soil sampling program to the week of August 23, 2004. This extension was due to difficulties with refusal and poor recovery at certain locations on the Elm Street site, including: EB-15, L12SE, O14E, O14N, Q16E, Q16N, R16, and SS-26.

Phase 2 Groundwater Elevation Monitoring Program

- Groundwater elevation monitoring continues on a monthly basis. The next date for monthly elevation monitoring is tentatively scheduled for the week of August 16, 2004.

4. Schedule for Future Project Status Meetings

Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 1747915 available for those unable to physically attend).

5. Other Miscellaneous Topics/Discussions

6. Update on Status of Agency Comments or Approval Items

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
August 19, 2004

11 AM – Site Trailer

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Leanne Roulier (BBL Field Team Leader)
- EPA: Cheryl Sprague (EPA Project Manager)
- Town of Milford: Tom Neforas (Town of Milford DPW)
- Aries Engineering: Tom Roy (Environmental Consultant to the Town of Milford), Katy Carlson (Chemical Engineer)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Groundwater Elevation Monitoring Program

- Groundwater elevation monitoring was completed on August 18, 2004.

Phase 2 Soil Sampling Program:

Mill Street Area

- In anticipation of the completion of soil sampling activities and subsequent demobilization from the site, BBL has extended the temporary fencing on the east and west sides of the Mill Street site to the railroad bed to further restrict public access. BBL personnel will continue to visit the site on a monthly basis to perform groundwater elevation monitoring and potentially groundwater sampling (pending receipt of EPA approval).

Elm Street Area

- Subsurface delineation samples have been collected from the following Elm Street sample locations: 3-CS-S08-A, EB-03B, EB-15, EB-15SE, EB-15SW, EB-20A, H06, I05, I06N, I07, J06, J07, K07, K09, L08, L12SE, L12SW, L14E, L14W, L15E, L15S, M17, M18, M18N, M18S, N18, O14E, O14N, O14W, O17, O18E, P18, Q11, Q12E, Q12N, Q14E, Q14W, Q16E, Q16N, Q16W, R12, R14, R16, SS-15, SS-15E, SS-15S, SS-15W, SS-17, SS-17E, SS-17S, SS-17W, and SS-26.

- Based on a review of site data, GE/BBL has determined that soil borings previously proposed by GE/BBL for the following locations are no longer necessary: D05, P17E, P17N, P17W, P17S, SS-19S, SS-19W, SS-38E, SS-38N, SS-38S, and SS-38W.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes from Phase 2 Pre-Design Investigation Progress Meeting
August 19, 2004

3. Summary of Near Term Tasks (BBL)

Phase 2 Soil Sampling Program:

Mill Street Area

- Based on recently obtained analytical data, additional subsurface delineation samples (5 feet below grade to rock) will be collected from Mill Street sample location D15.

- All previously proposed soil borings have been completed with the exception of soil borings C12W, C12SW, EB-21CW and D13SW. Based on the data from recently installed soil borings at nearby locations, these soil borings will not be installed.

- As per comments provided by EPA on July 16, 2004, GE/BBL will continue the subsurface soil sampling programs at Mill and Elm Street sites as necessary to delineate the extent of soils containing PCBs at concentrations above the soil cleanup levels.

Elm Street Area

- GE/BBL anticipate completion of the current subsurface delineation program by Friday, August 27, 2004.

Phase 2 Groundwater Elevation Monitoring Program

- Groundwater elevation monitoring continues on a monthly basis. The next date for monthly elevation monitoring is tentatively scheduled for the week of September 13, 2004.

4. Schedule for Future Project Status Meetings

Meetings will continue to be held at the site trailer on Thursdays at 11:00 AM to discuss weekly progress (call-in number 866 606-4717, access code 1747915 available for those unable to physically attend).

5. Other Miscellaneous Topics/Discussions

GE/BBL will be further demobilizing support area facilities (i.e., portable toilets, dumpster) during the next few weeks.

6. Update on Status of Agency Comments or Approval Items

- EPA anticipates that a letter regarding the definition of delineation samples will be sent by the end of this week.

- EPA anticipates that comments to the Water Monitoring Plan will be forthcoming over the next few weeks.

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes for Phase 2 Pre-Design Investigation Progress Meeting
August 26, 2004

11 AM – Site Trailer

1. Participants

- GE: Lewis Streeter (GE Project Manager)
- BBL: Leanne Roulier (BBL Field Team Leader); Corey Averill (BBL Project Manager)

2. Summary of Tasks Performed During Previous Week (BBL)

Phase 2 Groundwater Elevation Monitoring Program

- Groundwater elevation monitoring will continue to be performed on a monthly basis around the third week of each month.

Phase 2 Soil Sampling Program:

- GE/BBL anticipate completion of all remaining subsurface delineation soil borings by Friday, August 27, 2004.

Mill Street Area

- Based on recently obtained analytical data, additional subsurface delineation samples (5 feet below grade to rock) were collected from sample location D15.

Elm Street Area

- Based on recently obtained analytical data, additional subsurface delineation samples will be collected from the following sample locations: L12SW (9 feet below grade to water table), M10E (1 foot below grade to water table), L14E (5 to 11 feet below grade), and L15E (3 to 9 feet below grade).

3. Summary of Near Term Tasks (BBL)

- Upon completion of delineation soil sampling activities, BBL personnel will demobilize from the site on Friday, August 27, 2004.

- BBL personnel will return to the site periodically to perform miscellaneous activities, including: miscellaneous site security inspections/work, demobilization of site facilities (i.e., site sanitary facilities, equipment trailer, exchange of office trailer, etc.), coordination of off-site disposal of investigation-derived waste, monthly groundwater elevation monitoring, and quarterly groundwater sampling (pending receipt of EPA approval of Water Monitoring Plan).

Fletcher's Paint Works and Storage Facility Superfund Site
Minutes for Phase 2 Pre-Design Investigation Progress Meeting
August 26, 2004

3. Summary of Near Term Tasks (Continued) (BBL)

- Groundwater elevation monitoring will continue on a monthly basis. The next date for monthly elevation monitoring is tentatively scheduled for the week of September 13, 2004.

4. Schedule for Future Project Status Meetings

Future meetings will be held as warranted by the level of site activities. Meetings, if held, will be at the site trailer on Thursdays at 11:00 AM to discuss weekly progress. GE/BBL will provide notification and an agenda in advance of such meetings.

5. Other Miscellaneous Topics/Discussions

GE/BBL will be further demobilizing support area facilities (i.e., portable toilets, dumpster) during the next few weeks.

6. Update on Status of Agency Comments or Approval Items

Appendix C

Appendix C

Waste Characterization Sample Data and IDW Manifests

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Appendix C: Table of Contents

C Waste Characterization Sample Data and Investigation Derived Waste (IDW) Manifests

- Coal Pile Analytical Data and Non-Hazardous Waste Manifests
- Waste Characterization Data and Manifests for EPA IDW removal July 23, 2003
- Manifests for PDI IDW removal June 22 and 23, 2004
- Manifests for PDI IDW removal October 7, 2004

Draft for EPA Review

Coal Pile Analytical Data and Non-Hazardous Waste Manifests

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

PRELIMINARY ANALYTICAL
SUBJECT TO VERIFICATION

TABLE 1

FLETCHER PAINT
MILFORD, MASSACHUSETTS

MILL STREET PROPERTY SAMPLING
PCB SAMPLE DATA

(Results are presented in parts per million, ppm)

Sample ID	Depth(Feet)	Date Collected	Aroclor-1016, -1221, -1232, -1242, -1254, -1260	Aroclor-1248	Total PCBs
FP-MILL-S1	0-1	10/8/01	ND(0.035) [ND(0.034)]	0.96 [1.0]	0.96 [1.0]
FP-MILL-S2	0-1	10/8/01	ND(0.17)	1.3	1.3
FP-MILL-S3	0-1	10/8/01	ND(0.35)	4.0	4.0
FP-MILL-S4	0-1	10/8/01	ND(0.34)	3.6	3.6
FP-MILL-S5	0-1	10/8/01	ND(0.035)	0.85	0.85

Notes:
1. Samples were collected by Blasland, Bouck & Lee, Inc. and submitted to CT&E Environmental Services, Inc. for analysis of PCBs.
2. ND - Analyte was not detected. The value in parentheses is the associated detection limit.
3. Field duplicate sample locations are presented in brackets.

TABLE 1

FLETCHER PAINT
MILFORD, MASSACHUSETTS

COAL/SOIL PILE SAMPLING
VOC, SVOC AND IGNITABILITY SAMPLE DATA

(Results are presented in parts per million, ppm)

Parameter / Sample ID: / Date Collected:	NEW-PILE-COMP-1 11/08/01	OLD-PILE-COMP-1 11/08/01
Volatile Organics		
None Detected	--	--
Semivolatile Organics		
Fluoranthene	ND(0.50)	0.13 J
Naphthalene	0.14 J	ND(0.50)
Phenanthrene	ND(0.50)	0.12 J
Pyrene	ND(0.50)	0.17 J
Waste Characterization Parameters		
Ignitability (C^o)	> 100	> 100

Notes:

1. Samples were collected by Blasland, Bouck & Lee, Inc. and submitted to CT&E Environmental Services, Inc. for analysis of ignitability, volatile organic and semivolatile organic constituents.
2. -- Indicates that all constituents of the parameter group were not detected.
3. ND - Analyte was not detected. The value in parentheses is the associated detection limit.
4. J - Indicates an estimated value less than the practical quantitation limit (PQL).

5-62

High Acres Landfill
425 Perinton Parkway
Fairport, NY 14450
(716)223-6132

Manifest No. 9035
Western Expansion Site Permit No. NYS DEC 8-2644-00048/00021-0
High Acres Site Permit No. NYSDEC 8-2644-00048/00003

NON-HAZARDOUS SPECIAL WASTE MANIFEST

Generator Section

Generator of Waste (must be filled in by producer) General Electric
EPA. ID. NO. NA

Company Address:
(Print or Type) _____
(No.) (Street) (City) (State) (Zip)

Pick-up Address: Mill St. Area ~700' S. of Elm St. Milford NH
(No.) (Street) (City) (State) (Zip)

Telephone Number: _____

Waste Stream Identification: Approval ID: CV2132 (waste mgmt)

This manifest represents a non-hazardous waste as per E.P.A. and N.Y.S. D.E.C. regulations

Est Tons: 30 Other (Specify): _____

Special Handling instructions, if any: _____ None _____

This is to certify that the above named materials are properly classified, described, packages, marked and labeled and are in proper condition for transportation according to applicable state and federal law. The wastes were consigned to the transporter named. I certify that the foregoing is true and correct to the best of my knowledge.

Date: 2/27/02 Signature: [illegible] - Project Geologist as an agent for General Electric
(Name and Title)

Transportation Section

Hauler of Waste (must be filled in by hauler) Silvarole Trucking
ADDRESS: Rochester NY
Pick-up Date: 2-27-02 Truck No. 5-62 Vehicle Lic. No. 61451K NY

The above described waste was picked up and hauled by me to the disposal facility named below and was accepted. I certify that the foregoing is true and correct to the best of my knowledge.

Signature of authorized agent and title [signature] Date: 2-27-02

Disposal Facility

Disposer of Waste (must be filled in by the disposer)
Company Name: High Acres Landfill
Site Location: 425 Perinton Parkway Fairport, NY 14450

Waste subject to this manifest was delivered by the above hauler to this disposal facility and accepted on:

Disposal Date: _____ Total Tons: _____ Other (Specify): _____
Signature of authorized agent and title: _____

White & Canary - Landfill Pink - Hauler Golden Rod - Generator

High Acres Landfill
425 Perinton Parkway
Fairport, NY 14450
(716)223-6132

Manifest No. 9037
Western Expansion Site Permit No. NYS DEC 8-2644-00048/00021-0
High Acres Site Permit No. NYSDEC 8-2644-00048/00003

NON-HAZARDOUS SPECIAL WASTE MANIFEST

Generator Section

Generator of Waste (must be filled in by producer) General Electric
EPA. ID. NO. _____

Company Address:
(Print or Type) _____
(No.) (Street) (City) (State) (Zip)

Pick-up Address: Mill St Area - 700' S. of Elm St. Milford NH
(No.) (Street) (City) (State) (Zip)

Telephone Number: _____

Waste Stream Identification: Approval ID: CV2132 (Waste Management)

This manifest represents a non-hazardous waste as per E.P.A. and N.Y.S. D.E.C. regulations

Est Tons: 30 Other (Specify): _____

Special Handling instructions, if any: _____ None _____

This is to certify that the above named materials are properly classified, described, packages, marked and labeled and are in proper condition for transportation according to applicable state and federal law. The wastes were consigned to the transporter named. I certify that the foregoing is true and correct to the best of my knowledge.

Date: 2/27/02 Signature: [illegible] as agent for General Electric
(Name and Title)

Transportation Section

Hauler of Waste (must be filled in by hauler) Silvrook Trucking Inc.
ADDRESS: 1151 Br. Hen. T.L. Rd. Roch. N.Y.
Pick-up Date: 2-27-02 Truck No. S-63 Vehicle Lic. No. 2267 FE NY
The above described waste was picked up and hauled by me to the disposal facility named below and was accepted. I certify that the foregoing is true and correct to the best of my knowledge.

Signature of authorized agent and title [illegible] Date: 2-27-02

Disposal Facility

Disposer of Waste (must be filled in by the disposer)
Company Name: High Acres Landfill
Site Location: 425 Perinton Parkway Fairport, NY 14450

Waste subject to this manifest was delivered by the above hauler to this disposal facility and accepted on:

Disposal Date: _____ Total Tons: _____ Other (Specify): _____
Signature of authorized agent and title: _____

White & Canary - Landfill Pink - Hauler Golden Rod - Generator

High Acres Landfill
425 Perinton Parkway
Fairport, NY 14450
(716)223-6132

Manifest No. 9038
Western Expansion Site Permit No. NYS DEC 8-2644-00048/00021-0
High Acres Site Permit No. NYSDEC 8-2644-00048/00003

NON-HAZARDOUS SPECIAL WASTE MANIFEST

Generator Section

Generator of Waste (must be filled in by producer) GENERAL ELECTRIC

EPA. ID. NO. NA

Company Address:
(Print or Type) _____
(No.) (Street) (City) (State) (Zip)

Pick-up Address: Mill St Area. Approximately 700 feet South of Elm St - Milford, NH
(No.) (Street) (City) (State) (Zip)

Telephone Number: _____

Waste Stream Identification: Waste Management Approval ID: CV2132

This manifest represents a non-hazardous waste as per E.P.A. and N.Y.S. D.E.C. regulations

Est Tons: 30 Other (Specify): _____

Special Handling instructions, if any: _____ None _____

This is to certify that the above named materials are properly classified, described, packages, marked and labeled and are in proper condition for transportation according to applicable state and federal law. The wastes were consigned to the transporter named. I certify that the foregoing is true and correct to the best of my knowledge.

Date: 2-28-02 Signature: [illegible] as agent for General Electric
(Name and Title)

Transportation Section

Hauler of Waste (must be filled in by hauler) Mangiaracina Bros.

ADDRESS: 1960 Pittsford Rd. Castleton NY

Pick-up Date: 2/28/02 Truck No. M-41 Vehicle Lic. No. 5699PB NY

The above described waste was picked up and hauled by me to the disposal facility named below and was accepted. I certify that the foregoing is true and correct to the best of my knowledge.

Signature of authorized agent and title [illegible] Driver Date: 2/28/02

Disposal Facility

Disposer of Waste (must be filled in by the disposer)

Company Name: High Acres Landfill
Site Location: 425 Perinton Parkway Fairport, NY 14450

Waste subject to this manifest was delivered by the above hauler to this disposal facility and accepted on:

Disposal Date: _____ Total Tons: _____ Other (Specify): _____

Signature of authorized agent and title: _____

White & Canary - Landfill Pink - Hauler Golden Rod - Generator

High Acres Landfill
425 Perinton Parkway
Fairport, NY 14450
(716)223-6132

Manifest NO 9039
Western Expansion Site Permit No. NYS DEC 8-2644-00048/00021-0
High Acres Site Permit No. NYSDEC 8-2644-00048/00003

NON-HAZARDOUS SPECIAL WASTE MANIFEST

Generator Section

Generator of Waste (must be filled in by producer) GENERAL ELECTRIC
EPA. ID. NO. NA

Company Address:
(Print or Type)
(No.) (Street) (City) (State) (Zip)

Pick-up Address: Mill St. Area - Approximately 700 feet S. of Elm St - Milford, NH
(No.) (Street) (City) (State) (Zip)

Telephone Number:

Waste Stream Identification: Waste Management Approval #: CV2132

This manifest represents a non-hazardous waste as per E.P.A. and N.Y.S. D.E.C. regulations

Est Tons: 30 Other (Specify):

Special Handling instructions, if any: None

This is to certify that the above named materials are properly classified, described, packages, marked and labeled and are in proper condition for transportation according to applicable state and federal law. The wastes were consigned to the transporter named. I certify that the foregoing is true and correct to the best of my knowledge.

Date: 2-28-02 Signature: [illegible] as agent for General Electric
(Name and Title)

Transportation Section

Hauler of Waste (must be filled in by hauler) [illegible] Trucking
ADDRESS: [illegible]
Pick-up Date: 2/[illegible]/01 Truck No. [illegible] Vehicle Lic. No. [illegible]
The above described waste was picked up and hauled by me to the disposal facility named below and was accepted. I certify that the foregoing is true and correct to the best of my knowledge.

Signature of authorized agent and title [illegible] Date: 2/[illegible]/02

Disposal Facility

Disposer of Waste (must be filled in by the disposer)
Company Name: High Acres Landfill
Site Location: 425 Perinton Parkway Fairport, NY 14450

Waste subject to this manifest was delivered by the above hauler to this disposal facility and accepted on:

Disposal Date: Total Tons: Other (Specify):
Signature of authorized agent and title:

White & Canary - Landfill Pink - Hauler Golden Rod - Generator

High Acres Landfill
425 Perinton Parkway
Fairport, NY 14450
(716)223-6132

Manifest № 9054

Western Expansion Site Permit No. NYS DEC 8-2644-00048/00021-0
High Acres Site Permit No. NYSDEC 8-2644-00048/00003

NON-HAZARDOUS SPECIAL WASTE MANIFEST

Generator Section

Generator of Waste (must be filled in by producer) GENERAL ELECTRIC

EPA. ID. NO. NA

Company Address:
(Print or Type)
(No.) (Street) (City) (State) (Zip)

Pick-up Address: Mill St 760 feet S. of Elm St. Milford, NH
(No.) (Street) (City) (State) (Zip)

Telephone Number:

Waste Stream Identification: Waste Management Approval ID 2VA132

This manifest represents a non-hazardous waste as per E.P.A. and N.Y.S. D.E.C. regulations

Est Tons: 30 Other (Specify):

Special Handling instructions, if any: None

This is to certify that the above named materials are properly classified, described, packages, marked and labeled and are in proper condition for transportation according to applicable state and federal law. The wastes were consigned to the transporter named. I certify that the foregoing is true and correct to the best of my knowledge.

Date: 9/29/02 Signature: [illegible]
(Name and Title)

Transportation Section

Hauler of Waste (must be filled in by hauler) [illegible]

ADDRESS:

Pick-up Date: [illegible] Truck No. S-62 Vehicle Lic. No. 8265 PB

The above described waste was picked up and hauled by me to the disposal facility named below and was accepted. I certify that the foregoing is true and correct to the best of my knowledge.

Signature of authorized agent and title [illegible] Date: [illegible]

Disposal Facility

Disposer of Waste (must be filled in by the disposer)

Company Name: High Acres Landfill
Site Location: 425 Perinton Parkway Fairport, NY 14450

Waste subject to this manifest was delivered by the above hauler to this disposal facility and accepted on:

Disposal Date: Total Tons: Other (Specify):

Signature of authorized agent and title:

White & Canary - Landfill Pink - Hauler Golden Rod - Generator

High Acres Landfill
425 Perinton Parkway
Fairport, NY 14450
(716)223-6132

Manifest N° 9055

Western Expansion Site Permit No. NYS DEC 8-2644-00048/00021-0
High Acres Site Permit No. NYSDEC 8-2644-00048/00003

NON-HAZARDOUS SPECIAL WASTE MANIFEST

Generator Section

Generator of Waste (must be filled in by producer) GENERAL ELECTRIC

EPA. ID. NO. NA

Company Address:
(Print or Type) _____
(No.) (Street) (City) (State) (Zip)

Pick-up Address: Mill St. ~700 feet S of Elm St. Milford, NH
(No.) (Street) (City) (State) (Zip)

Telephone Number: _____

Waste Stream Identification: Waste Mgmt Approval ID: CV2132-

This manifest represents a non-hazardous waste as per E.P.A. and N.Y.S. D.E.C. regulations

Est Tons: _____ Other (Specify): _____

Special Handling instructions, if any: _____ None _____

This is to certify that the above named materials are properly classified, described, packages, marked and labeled and are in proper condition for transportation according to applicable state and federal law. The wastes were consigned to the transporter named. I certify that the foregoing is true and correct to the best of my knowledge.

Date: 2/28/02 Signature: [illegible] as an agent for General Electric
(Name and Title)

Transportation Section

Hauler of Waste (must be filled in by hauler) MANGIARDI BROS TRUCKING

ADDRESS: PM7189 Cab NY

Pick-up Date: 2-28-02 Truck No. 97 Vehicle Lic. No. AE 52018 Tr NY

The above described waste was picked up and hauled by me to the disposal facility named below and was accepted. I certify that the foregoing is true and correct to the best of my knowledge. AB52018 NY Trailer

Signature of authorized agent and title [illegible] Date: 2-28-02

Disposal Facility

Disposer of Waste (must be filled in by the disposer)

Company Name: High Acres Landfill
Site Location: 425 Perinton Parkway Fairport, NY 14450

Waste subject to this manifest was delivered by the above hauler to this disposal facility and accepted on:

Disposal Date: _____ Total Tons: _____ Other (Specify): _____

Signature of authorized agent and title: _____

White & Canary - Landfill Pink - Hauler Golden Rod - Generator

High Acres Landfill
425 Perinton Parkway
Fairport, NY 14450
(716)223-6132

Manifest № 11693

Western Expansion Site Permit No. NYS DEC 8-2644-00048/00021-0
High Acres Site Permit No. NYSDEC 8-2644-00048/00003

NON-HAZARDOUS SPECIAL WASTE MANIFEST

Generator Section

Generator of Waste (must be filled in by producer) GENERAL ELECTRIC

EPA. ID. NO. NA

Company Address:
(Print or Type)
(No.) (Street) (City) (State) (Zip)

Pick-up Address: Mill St. Area Approximately 700 feet South of Elm St - Milford, NH
(No.) (Street) (City) (State) (Zip)

Telephone Number:

Waste Stream Identification: Waste Management Approval ID: CV2152

This manifest represents a non-hazardous waste as per E.P.A. and N.Y.S. D.E.C. regulations

Est Tons: 22 Other (Specify):

Special Handling instructions, if any: None

This is to certify that the above named materials are properly classified, described, packages, marked and labeled and are in proper condition for transportation according to applicable state and federal law. The wastes were consigned to the transporter named. I certify that the foregoing is true and correct to the best of my knowledge.

Date: 2-28-02 Signature:
(Name and Title)

Transportation Section

Hauler of Waste (must be filled in by hauler) Suffolk Trk

ADDRESS: AF54653 ^

Pick-up Date: Truck No. Vehicle Lic. No. AF54653

The above described waste was picked up and hauled by me to the disposal facility named below and was accepted. I certify that the foregoing is true and correct to the best of my knowledge.

Signature of authorized agent and title Date:

Disposal Facility

Disposer of Waste (must be filled in by the disposer)

Company Name: High Acres Landfill
Site Location: 425 Perinton Parkway Fairport, NY 14450

Waste subject to this manifest was delivered by the above hauler to this disposal facility and accepted on:

Disposal Date: Total Tons: Other (Specify):

Signature of authorized agent and title:

White & Canary - Landfill Pink - Hauler Golden Rod - Generator

High Acres Landfill
425 Perinton Parkway
Fairport, NY 14450
(716)223-6132

Manifest № 11694
Western Expansion Site Permit No. NYS DEC 8-2644-00048/00021-0
High Acres Site Permit No. NYSDEC 8-2644-00048/00003

NON-HAZARDOUS SPECIAL WASTE MANIFEST

Generator Section

Generator of Waste (must be filled in by producer) GENERAL ELECTRIC
EPA. ID. NO. N/A

Company Address:
(Print or Type)
(No.) (Street) (City) (State) (Zip)

Pick-up Address: Mill St. Area Approximately 700 feet South of Elm St. Milford, NH
(No.) (Street) (City) (State) (Zip)

Telephone Number:

Waste Stream Identification: Waste Management Approval ID: CN2132

This manifest represents a non-hazardous waste as per E.P.A. and N.Y.S. D.E.C. regulations

Est Tons: 22 Other (Specify):

Special Handling instructions, if any: None

This is to certify that the above named materials are properly classified, described, packages, marked and labeled and are in proper condition for transportation according to applicable state and federal law. The wastes were consigned to the transporter named. I certify that the foregoing is true and correct to the best of my knowledge.

Date: 2-28-02 Signature: [illegible] Sub Contract Air
(Name and Title) Landfill Engineer

Transportation Section

Hauler of Waste (must be filled in by hauler) SILVA POLE
ADDRESS: [illegible] AE 9253 NY
Pick-up Date: [illegible] Truck No. [illegible] Vehicle Lic. No. AE 12573

The above described waste was picked up and hauled by me to the disposal facility named below and was accepted. I certify that the foregoing is true and correct to the best of my knowledge.

Signature of authorized agent and title [illegible] Date: 2 28 02

Disposal Facility

Disposer of Waste (must be filled in by the disposer)
Company Name: High Acres Landfill
Site Location: 425 Perinton Parkway Fairport, NY 14450

Waste subject to this manifest was delivered by the above hauler to this disposal facility and accepted on:

Disposal Date: Total Tons: Other (Specify):
Signature of authorized agent and title:

White & Canary - Landfill Pink - Hauler Golden Rod - Generator

Draft for EPA Review

Waste Characterization Data and Manifests for EPA IDW Removal
July 23, 2003

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O. Box 370, Manchester, CT 06045-0370
Tel. (860) 645-1102 Fax (860) 645-0823

RECEIVED JUL 14 2003

Wednesday, July 09, 2003

Wast Tech Services
640 Park Place
Niagra Falls NY 14301

Attention: Mr Mike Oliver

Sample ID#: AE90624-90630

This laboratory is in compliance with the QA/QC procedure outlined in EPA 600/4-79-019, Handbook for Analytical Quality in Water and Waste Water, March 1979, and SW846 QA/QC requirements of procedures used.

If you have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext. 200.

Sincerely yours,

Phyllis Shiller

Phyllis Shiller
Laboratory Director

CT Lab Registration #PH-0618
MA Lab Registration #MA-CT-007
NY Lab Registration #11301
RI Lab Registration #63
NH Lab Registration #213693-A,B
ME Lab Registration #CT-007
NJ Lab Registration #CT-003

Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

Analysis Report

July 09, 2003

FOR: Attn: Mr. Mike Oliver
Waste Tech Services
640 Park Place
Niagara Falls, NY 14301

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:	VG	07/02/03	10:10
Location Code:	WASTETEC	Received by:	KJB	07/02/03	17:30
Rush Request:	RUSH#	Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAE90624
Phoenix I.D.: AE90624

Laboratory Data

Client ID: FLETCHER PAINT 007,005,008,013,020

Parameter	Result	RL	Units	Date	Time	By	Reference
TCLP Silver	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Arsenic	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Barium	0.31	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Cadmium	BDL	0.005	mg/L	07/07/03		EK	E1311/SW6010
TCLP Chromium	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Lead	0.091	0.015	mg/L	07/07/03		EK	E1311/SW6010
TCLP Selenium	BDL	0.05	mg/L	07/07/03		EK	E1311/SW6010
TCLP Mercury	BDL	0.001	mg/L	07/07/03		RS	E1311/E245.1
Percent Solid	92		%	07/03/03		MR/	E160.3
Corrosivity	Negative	NONE	None	07/03/03		EG	S423/E150.1
Flash Point	>200	200	degree F	07/03/03		JR	SW846 - 1010
Ignitability	Passed	140	deg F	07/03/03		JR	SW846 - 1010
pH	5.96	0.10	pH Units	07/03/03	8:15	EG	E150.1/SW9045
Reactivity Cyanide	BDL	1.0	mg/Kg	07/07/03		PJ	SW 846-7.3
Reactivity Sulfide	BDL	20	mg/Kg	07/07/03		PJ	SW846-7.3
Reactivity	Negative			07/07/03		PJ	SW 846-7.3
Field Services	Completed			07/08/03		LC	
Soil Extraction for PCB	Completed			07/02/03		B/A	3545/3550
TCLP Digestion Mercury	Completed			07/07/03		TR	E1311/7470
TCLP Extraction Metals	Completed			07/02/03		M/Z	EPA 1311
TCLP Metals Digestion	Completed			07/03/03		Z/H	SW846 - 3005
Polychlorinated Biphenyls							
PCB-1016	ND	400	ug/Kg	07/08/03		JRB	SW 8082
PCB-1221	ND	400	ug/Kg	07/08/03		JRB	SW 8082

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB-1232	ND	400	ug/Kg	07/08/03		JRB	SW 8082
PCB-1242	ND	400	ug/Kg	07/08/03		JRB	SW 8082
PCB-1248	120000	400	ug/Kg	07/08/03		JRB	SW 8082
PCB-1254	ND	400	ug/Kg	07/08/03		JRB	SW 8082
PCB-1260	52000	400	ug/Kg	07/08/03		JRB	SW 8082
PCB-1262	ND	400	ug/Kg	07/08/03		JRB	SW 8082
PCB-1268	ND	400	ug/Kg	07/08/03		JRB	SW 8082
QA/QC Surrogates							
% DCBP (Surrogate Rec)	diluted out		%	07/08/03		JRB	SW 8082
% TCMX (Surrogate Rec)	diluted out		%	07/08/03		JRB	SW 8082
Volatiles							
1,1,1,2-Tetrachloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,1-Trichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,2,2-Tetrachloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,2-Trichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,3-Trichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,3-Trichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,4-Trichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,4-Trimethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dibromo-3-chloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3,5-Trimethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,4-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
2,2-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
2-Chlorotoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
4-Chlorotoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
Benzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromochloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromodichloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromoform	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromomethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Carbon tetrachloride	ND	10	ug/Kg	07/03/03		RM	SW8260
Chlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloroform	ND	10	ug/Kg	07/03/03		RM	SW8260

Client ID: FLETCHER PAINT 007,005,008,013,020 Phoenix I.D.: AE90624

Parameter	Result	RL	Units	Date	Time	By	Reference
Chloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
cis-1,2-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
cis-1,3-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromochloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromoethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromomethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dichlorodifluoromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Ethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Hexachlorobutadiene	ND	10	ug/Kg	07/03/03		RM	SW8260
Isopropylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
m&p-Xylene	ND	10	ug/Kg	07/03/03		RM	SW8260
Methyl Ethyl Ketone	ND	60	ug/Kg	07/03/03		RM	SW8260
Methyl t-butyl ether (MTBE)	ND	20	ug/Kg	07/03/03		RM	SW8260
Methylene chloride	ND	10	ug/Kg	07/03/03		RM	SW8260
n-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
n-Propylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Naphthalene	ND	10	ug/Kg	07/03/03		RM	SW8260
o-Xylene	ND	10	ug/Kg	07/03/03		RM	SW8260
p-Isopropyltoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
sec-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Styrene	ND	10	ug/Kg	07/03/03		RM	SW8260
tert-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Tetrachloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
Toluene	ND	10	ug/Kg	07/03/03		RM	SW8260
Total Xylenes	ND	10	ug/Kg	07/03/03		RM	SW8260
trans-1,2-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
trans-1,3-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
Trichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
Trichlorofluoromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Vinyl chloride	ND	10	ug/Kg	07/03/03		RM	SW8260
QA/QC Surrogates							
% Bromofluorobenzene	93		%	07/03/03		RM	SW8260

Comments: ND=Not detected BDL = Below Detection Limit RL=Reporting Limit

A mix of Arochlors was present in chromatogram.

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

Phyllis Shiller, Laboratory Director
July 09, 2003

Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

Analysis Report

July 09, 2003

FOR: Attn: Mr. Mike Oliver
Waste Tech Services
640 Park Place
Niagara Falls, NY 14301

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:	VG	07/02/03	10:15
Location Code:	WASTETEC	Received by:	KJB	07/02/03	17:30
Rush Request:	RUSH#	Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAE90624
Phoenix I.D.: AE90625

Laboratory Data

Client ID: FLETCHER PAINT 027,029,031,033,037

Parameter	Result	RL	Units	Date	Time	By	Reference
TCLP Silver	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Arsenic	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Barium	0.40	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Cadmium	BDL	0.005	mg/L	07/07/03		EK	E1311/SW6010
TCLP Chromium	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Lead	0.029	0.015	mg/L	07/07/03		EK	E1311/SW6010
TCLP Selenium	BDL	0.05	mg/L	07/07/03		EK	E1311/SW6010
TCLP Mercury	BDL	0.001	mg/L	07/07/03		RS	E1311/E245.1
Percent Solid	89		%	07/03/03		MR/	E160.3
Corrosivity	Negative	NONE	None	07/03/03		EG	S423/E150.1
Flash Point	>200	200	degree F	07/03/03		JR	SW846 - 1010
Ignitability	Passed	140	deg F	07/03/03		JR	SW846 - 1010
pH	8.23	0.10	pH Units	07/03/03	8:15	EG	E150.1/SW9045
Reactivity Cyanide	BDL	1.0	mg/Kg	07/07/03		PJ	SW 846-7.3
Reactivity Sulfide	BDL	20	mg/Kg	07/07/03		PJ	SW846-7.3
Reactivity	Negative			07/07/03		PJ	SW 846-7.3
Soil Extraction for PCB	Completed			07/02/03		B/A	3545/3550
TCLP Digestion Mercury	Completed			07/07/03		TR	E1311/7470
TCLP Extraction Metals	Completed			07/02/03		M/Z	EPA 1311
TCLP Metals Digestion	Completed			07/03/03		Z/H	SW846 - 3005
Polychlorinated Biphenyls							
PCB-1016	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1221	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1232	ND	400	ug/Kg	07/07/03		JRB	SW 8082

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB-1242	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1248	6000	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1254	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1260	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1262	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1268	ND	400	ug/Kg	07/07/03		JRB	SW 8082
QA/QC Surrogates							
% DCBP (Surrogate Rec)	90		%	07/07/03		JRB	SW 8082
% TCMX (Surrogate Rec)	102		%	07/07/03		JRB	SW 8082
Volatiles							
1,1,1,2-Tetrachloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,1-Trichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,2,2-Tetrachloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,2-Trichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,3-Trichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,3-Trichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,4-Trichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,4-Trimethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dibromo-3-chloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3,5-Trimethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,4-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
2,2-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
2-Chlorotoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
4-Chlorotoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
Benzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromochloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromodichloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromoform	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromomethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Carbon tetrachloride	ND	10	ug/Kg	07/03/03		RM	SW8260
Chlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloroform	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260

Client ID: FLETCHER PAINT 027,029,031,033,037 Phoenix I.D.: AE90625

Parameter	Result	RL	Units	Date	Time	By	Reference
cis-1,2-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
cis-1,3-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromochloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromoethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromomethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dichlorodifluoromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Ethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Hexachlorobutadiene	ND	10	ug/Kg	07/03/03		RM	SW8260
Isopropylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
m&p-Xylene	ND	10	ug/Kg	07/03/03		RM	SW8260
Methyl Ethyl Ketone	ND	60	ug/Kg	07/03/03		RM	SW8260
Methyl t-butyl ether (MTBE)	ND	20	ug/Kg	07/03/03		RM	SW8260
Methylene chloride	ND	10	ug/Kg	07/03/03		RM	SW8260
n-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
n-Propylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Naphthalene	ND	10	ug/Kg	07/03/03		RM	SW8260
o-Xylene	ND	10	ug/Kg	07/03/03		RM	SW8260
p-Isopropyltoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
sec-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Styrene	ND	10	ug/Kg	07/03/03		RM	SW8260
tert-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Tetrachloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
Toluene	ND	10	ug/Kg	07/03/03		RM	SW8260
Total Xylenes	ND	10	ug/Kg	07/03/03		RM	SW8260
trans-1,2-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
trans-1,3-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
Trichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
Trichlorofluoromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Vinyl chloride	ND	10	ug/Kg	07/03/03		RM	SW8260
QA/QC Surrogates							
% Bromofluorobenzene	94		%	07/03/03		RM	SW8260

Comments: ND=Not detected BDL = Below Detection Limit RL=Reporting Limit

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

Phyllis Shiller, Laboratory Director
July 09, 2003

Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

Analysis Report

July 09, 2003

FOR: Attn: Mr. Mike Oliver
Waste Tech Services
640 Park Place
Niagara Falls, NY 14301

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:	VG	07/02/03	10:20
Location Code:	WASTETEC	Received by:	KJB	07/02/03	17:30
Rush Request:	RUSH#	Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAE90624
Phoenix I.D.: AE90626

Laboratory Data

Client ID: FLETCHER PAINT 039,047,074,077,090

Parameter	Result	RL	Units	Date	Time	By	Reference
TCLP Silver	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Arsenic	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Barium	0.28	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Cadmium	BDL	0.005	mg/L	07/07/03		EK	E1311/SW6010
TCLP Chromium	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Lead	BDL	0.015	mg/L	07/07/03		EK	E1311/SW6010
TCLP Selenium	BDL	0.05	mg/L	07/07/03		EK	E1311/SW6010
TCLP Mercury	BDL	0.001	mg/L	07/07/03		RS	E1311/E245.1
Percent Solid	87		%	07/03/03		MR/	E160.3
Corrosivity	Negative	NONE	None	07/03/03		EG	S423/E150.1
Flash Point	>200	200	degree F	07/03/03		JR	SW846 - 1010
Ignitability	Passed	140	deg F	07/03/03		JR	SW846 - 1010
pH	8.00	0.10	pH Units	07/03/03	8:15	EG	E150.1/SW9045
Reactivity Cyanide	BDL	1.0	mg/Kg	07/07/03		PJ	SW 846-7.3
Reactivity Sulfide	BDL	20	mg/Kg	07/07/03		PJ	SW846-7.3
Reactivity	Negative			07/07/03		PJ	SW 846-7.3
Soil Extraction for PCB	Completed			07/02/03		B/A	3545/3550
TCLP Digestion Mercury	Completed			07/07/03		TR	E1311/7470
TCLP Extraction Metals	Completed			07/02/03		M/Z	EPA 1311
TCLP Metals Digestion	Completed			07/03/03		Z/H	SW846 - 3005
Polychlorinated Biphenyls							
PCB-1016	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1221	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1232	ND	400	ug/Kg	07/07/03		JRB	SW 8082

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB-1242	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1248	2800	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1254	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1260	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1262	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1268	ND	400	ug/Kg	07/07/03		JRB	SW 8082
QA/QC Surrogates							
% DCBP (Surrogate Rec)	77		%	07/07/03		JRB	SW 8082
% TCMX (Surrogate Rec)	91		%	07/07/03		JRB	SW 8082
Volatiles							
1,1,1,2-Tetrachloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,1-Trichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,2,2-Tetrachloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,2-Trichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,3-Trichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,3-Trichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,4-Trichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,4-Trimethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dibromo-3-chloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3,5-Trimethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,4-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
2,2-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
2-Chlorotoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
4-Chlorotoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
Benzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromochloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromodichloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromoform	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromomethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Carbon tetrachloride	ND	10	ug/Kg	07/03/03		RM	SW8260
Chlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloroform	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260

Client ID: FLETCHER PAINT 039,047,074,077,090 Phoenix I.D.: AE90626

Parameter	Result	RL	Units	Date	Time	By	Reference
cis-1,2-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
cis-1,3-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromochloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromoethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromomethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dichlorodifluoromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Ethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Hexachlorobutadiene	ND	10	ug/Kg	07/03/03		RM	SW8260
Isopropylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
m&p-Xylene	ND	10	ug/Kg	07/03/03		RM	SW8260
Methyl Ethyl Ketone	ND	60	ug/Kg	07/03/03		RM	SW8260
Methyl t-butyl ether (MTBE)	ND	20	ug/Kg	07/03/03		RM	SW8260
Methylene chloride	ND	10	ug/Kg	07/03/03		RM	SW8260
n-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
n-Propylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Naphthalene	ND	10	ug/Kg	07/03/03		RM	SW8260
o-Xylene	ND	10	ug/Kg	07/03/03		RM	SW8260
p-Isopropyltoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
sec-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Styrene	ND	10	ug/Kg	07/03/03		RM	SW8260
tert-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Tetrachloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
Toluene	ND	10	ug/Kg	07/03/03		RM	SW8260
Total Xylenes	ND	10	ug/Kg	07/03/03		RM	SW8260
trans-1,2-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
trans-1,3-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
Trichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
Trichlorofluoromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Vinyl chloride	ND	10	ug/Kg	07/03/03		RM	SW8260
QA/QC Surrogates							
% Bromofluorobenzene	93		%	07/03/03		RM	SW8260

Comments: ND=Not detected BDL = Below Detection Limit RL=Reporting Limit

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

Phyllis Shiller

Phyllis Shiller, Laboratory Director
July 09, 2003

PHOENIX

Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

Analysis Report

July 09, 2003

FOR: Attn: Mr. Mike Oliver
Waste Tech Services
640 Park Place
Niagara Falls, NY 14301

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:	VG	07/02/03	10:35
Location Code:	WASTETEC	Received by:	KJB	07/02/03	17:30
Rush Request:	RUSH#	Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAE90624
Phoenix I.D.: AE90627

Laboratory Data

Client ID: FLETCHER PAINT 017,023,025,043,046

Parameter	Result	RL	Units	Date	Time	By	Reference
TCLP Silver	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Arsenic	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Barium	0.33	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Cadmium	BDL	0.005	mg/L	07/07/03		EK	E1311/SW6010
TCLP Chromium	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Lead	BDL	0.015	mg/L	07/07/03		EK	E1311/SW6010
TCLP Selenium	BDL	0.05	mg/L	07/07/03		EK	E1311/SW6010
TCLP Mercury	BDL	0.001	mg/L	07/07/03		RS	E1311/E245.1
Percent Solid	86		%	07/03/03		MR/	E160.3
Corrosivity	Negative	NONE	None	07/03/03		EG	S423/E150.1
Flash Point	>200	200	degree F	07/03/03		JR	SW846 - 1010
Ignitability	Passed	140	deg F	07/03/03		JR	SW846 - 1010
pH	6.99	0.10	pH Units	07/03/03	8:15	EG	E150.1/SW9045
Reactivity Cyanide	BDL	1.0	mg/Kg	07/07/03		PJ	SW 846-7.3
Reactivity Sulfide	BDL	20	mg/Kg	07/07/03		PJ	SW846-7.3
Reactivity	Negative			07/07/03		PJ	SW 846-7.3
Soil Extraction for PCB	Completed			07/02/03		B/A	3545/3550
TCLP Digestion Mercury	Completed			07/07/03		TR	E1311/7470
TCLP Extraction Metals	Completed			07/02/03		M/Z	EPA 1311
TCLP Metals Digestion	Completed			07/03/03		Z/H	SW846 - 3005
Polychlorinated Biphenyls							
PCB-1016	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1221	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1232	ND	400	ug/Kg	07/07/03		JRB	SW 8082

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB-1242	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1248	29000	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1254	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1260	4000	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1262	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1268	ND	400	ug/Kg	07/07/03		JRB	SW 8082
QA/QC Surrogates							
% DCBP (Surrogate Rec)	diluted out		%	07/07/03		JRB	SW 8082
% TCMX (Surrogate Rec)	diluted out		%	07/07/03		JRB	SW 8082
Volatiles							
1,1,1,2-Tetrachloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,1-Trichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,2,2-Tetrachloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,2-Trichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,3-Trichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,3-Trichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,4-Trichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,4-Trimethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dibromo-3-chloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3,5-Trimethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,4-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
2,2-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
2-Chlorotoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
4-Chlorotoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
Benzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromochloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromodichloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromoform	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromomethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Carbon tetrachloride	ND	10	ug/Kg	07/03/03		RM	SW8260
Chlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloroform	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260

Client ID: FLETCHER PAINT 017,023,025,043,046 Phoenix I.D.: AE90627

Parameter	Result	RL	Units	Date	Time	By	Reference
cis-1,2-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
cis-1,3-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromochloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromoethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromomethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dichlorodifluoromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Ethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Hexachlorobutadiene	ND	10	ug/Kg	07/03/03		RM	SW8260
Isopropylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
m&p-Xylene	ND	10	ug/Kg	07/03/03		RM	SW8260
Methyl Ethyl Ketone	ND	60	ug/Kg	07/03/03		RM	SW8260
Methyl t-butyl ether (MTBE)	ND	20	ug/Kg	07/03/03		RM	SW8260
Methylene chloride	ND	10	ug/Kg	07/03/03		RM	SW8260
n-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
n-Propylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Naphthalene	ND	10	ug/Kg	07/03/03		RM	SW8260
o-Xylene	ND	10	ug/Kg	07/03/03		RM	SW8260
p-Isopropyltoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
sec-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Styrene	ND	10	ug/Kg	07/03/03		RM	SW8260
tert-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Tetrachloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
Toluene	ND	10	ug/Kg	07/03/03		RM	SW8260
Total Xylenes	ND	10	ug/Kg	07/03/03		RM	SW8260
trans-1,2-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
trans-1,3-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
Trichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
Trichlorofluoromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Vinyl chloride	ND	10	ug/Kg	07/03/03		RM	SW8260
QA/QC Surrogates							
% Bromofluorobenzene	93		%	07/03/03		RM	SW8260

Comments: ND=Not detected BDL = Below Detection Limit RL=Reporting Limit

A mix of Arochlors was present in chromatogram.

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

Phyllis Shiller, Laboratory Director
July 09, 2003

PHOENIX
Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

Analysis Report

July 09, 2003

FOR: Attn: Mr. Mike Oliver
Waste Tech Services
640 Park Place
Niagara Falls, NY 14301

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:	VG	07/02/03	10:40
Location Code:	WASTETEC	Received by:	KJB	07/02/03	17:30
Rush Request:	RUSH#	Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAE90624
Phoenix I.D.: AE90628

Laboratory Data

Client ID: FLETCHER PAINT 055,057,063,066,085

Parameter	Result	RL	Units	Date	Time	By	Reference
TCLP Silver	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Arsenic	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Barium	1.48	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Cadmium	BDL	0.005	mg/L	07/07/03		EK	E1311/SW6010
TCLP Chromium	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Lead	0.059	0.015	mg/L	07/07/03		EK	E1311/SW6010
TCLP Selenium	BDL	0.05	mg/L	07/07/03		EK	E1311/SW6010
TCLP Mercury	BDL	0.001	mg/L	07/07/03		RS	E1311/E245.1
Percent Solid	81		%	07/03/03		MR/	E160.3
Corrosivity	Negative	NONE	None	07/03/03		EG	S423/E150.1
Flash Point	>200	200	degree F	07/03/03		JR	SW846 - 1010
Ignitability	Passed	140	deg F	07/03/03		JR	SW846 - 1010
pH	10.69	0.10	pH Units	07/03/03	8:15	EG	E150.1/SW9045
Reactivity Cyanide	BDL	1.0	mg/Kg	07/07/03		PJ	SW 846-7.3
Reactivity Sulfide	BDL	20	mg/Kg	07/07/03		PJ	SW846-7.3
Reactivity	Negative			07/07/03		PJ	SW 846-7.3
Soil Extraction for PCB	Completed			07/02/03		B/A	3545/3550
TCLP Digestion Mercury	Completed			07/07/03		TR	E1311/7470
TCLP Extraction Metals	Completed			07/02/03		M/Z	EPA 1311
TCLP Metals Digestion	Completed			07/03/03		Z/H	SW846 - 3005
Polychlorinated Biphenyls							
PCB-1016	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1221	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1232	ND	400	ug/Kg	07/07/03		JRB	SW 8082

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB-1242	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1248	1000000	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1254	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1260	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1262	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1268	ND	400	ug/Kg	07/07/03		JRB	SW 8082
QA/QC Surrogates							
% DCBP (Surrogate Rec)	diluted out		%	07/07/03		JRB	SW 8082
% TCMX (Surrogate Rec)	diluted out		%	07/07/03		JRB	SW 8082
Volatiles							
1,1,1,2-Tetrachloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,1-Trichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,2,2-Tetrachloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1,2-Trichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,1-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,3-Trichlorobenzene	72	10	ug/Kg	07/03/03		RM	SW8260
1,2,3-Trichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2,4-Trichlorobenzene	200	10	ug/Kg	07/03/03		RM	SW8260
1,2,4-Trimethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dibromo-3-chloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,2-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3,5-Trimethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
1,3-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
1,4-Dichlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
2,2-Dichloropropane	ND	10	ug/Kg	07/03/03		RM	SW8260
2-Chlorotoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
4-Chlorotoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
Benzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromochloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromodichloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromoform	ND	10	ug/Kg	07/03/03		RM	SW8260
Bromomethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Carbon tetrachloride	ND	10	ug/Kg	07/03/03		RM	SW8260
Chlorobenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloroethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloroform	ND	10	ug/Kg	07/03/03		RM	SW8260
Chloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260

Client ID: FLETCHER PAINT 055,057,063,066,085 Phoenix I.D.: AE90628

Parameter	Result	RL	Units	Date	Time	By	Reference
cis-1,2-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
cis-1,3-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromochloromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromoethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dibromomethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Dichlorodifluoromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Ethylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Hexachlorobutadiene	ND	10	ug/Kg	07/03/03		RM	SW8260
Isopropylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
m&p-Xylene	ND	10	ug/Kg	07/03/03		RM	SW8260
Methyl Ethyl Ketone	ND	60	ug/Kg	07/03/03		RM	SW8260
Methyl t-butyl ether (MTBE)	ND	20	ug/Kg	07/03/03		RM	SW8260
Methylene chloride	13	10	ug/Kg	07/03/03		RM	SW8260
n-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
n-Propylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Naphthalene	ND	10	ug/Kg	07/03/03		RM	SW8260
o-Xylene	ND	10	ug/Kg	07/03/03		RM	SW8260
p-Isopropyltoluene	ND	10	ug/Kg	07/03/03		RM	SW8260
sec-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Styrene	ND	10	ug/Kg	07/03/03		RM	SW8260
tert-Butylbenzene	ND	10	ug/Kg	07/03/03		RM	SW8260
Tetrachloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
Toluene	ND	10	ug/Kg	07/03/03		RM	SW8260
Total Xylenes	ND	10	ug/Kg	07/03/03		RM	SW8260
trans-1,2-Dichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
trans-1,3-Dichloropropene	ND	10	ug/Kg	07/03/03		RM	SW8260
Trichloroethene	ND	10	ug/Kg	07/03/03		RM	SW8260
Trichlorofluoromethane	ND	10	ug/Kg	07/03/03		RM	SW8260
Vinyl chloride	ND	10	ug/Kg	07/03/03		RM	SW8260
QA/QC Surrogates							
% Bromofluorobenzene	90		%	07/03/03		RM	SW8260

Comments: ND=Not detected BDL = Below Detection Limit RL=Reporting Limit

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

Phyllis Shiller

Phyllis Shiller, Laboratory Director
July 09, 2003

Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

Analysis Report

July 09, 2003

FOR: Attn: Mr. Mike Oliver
Waste Tech Services
640 Park Place
Niagara Falls, NY 14301

Sample Information		Custody Information		Date	Time
Matrix:	WATER	Collected by:	VG	07/02/03	12:00
Location Code:	WASTETEC	Received by:	KJB	07/02/03	17:30
Rush Request:	RUSH#	Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAE90624
Phoenix I.D.: AE90629

Laboratory Data

Client ID: FLETCHER PAINT 041,080

Parameter	Result	RL	Units	Date	Time	By	Reference
TCLP Silver	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Arsenic	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Barium	0.03	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Cadmium	BDL	0.005	mg/L	07/07/03		EK	E1311/SW6010
TCLP Chromium	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Lead	BDL	0.015	mg/L	07/07/03		EK	E1311/SW6010
TCLP Selenium	BDL	0.05	mg/L	07/07/03		EK	E1311/SW6010
TCLP Mercury	BDL	0.001	mg/L	07/07/03		RS	E1311/E245.1
Corrosivity	Negative	NONE	None	07/03/03		EG	S423/E150.1
Flash Point	>200	200	degree F	07/03/03		JR	SW846 - 1010
Ignitability	Passed	140	deg F	07/03/03		JR	SW846 - 1010
pH	7.11	0.10	pH Units	07/03/03	23:00	CD	E150.1/SW9045
Reactivity Cyanide	BDL	0.01	mg/L	07/07/03		PJ	SW 846-7.3
Reactivity Sulfide	BDL	0.4	mg/L	07/07/03		PJ	SW846-7.3
PCB Extraction	Completed			07/03/03		X/H	SW3510/3520
TCLP Digestion Mercury	Completed			07/07/03		TR	E1311/7470
TCLP Extraction Metals	Completed			07/02/03		M/Z	EPA 1311
TCLP Metals Digestion	Completed			07/03/03		Z/H	SW846 - 3005
Polychlorinated Biphenyls							
PCB-1016	ND	0.5	ug/L	07/05/03		JRB	608/ 8082
PCB-1221	ND	0.5	ug/L	07/05/03		JRB	608/ 8082
PCB-1232	ND	0.5	ug/L	07/05/03		JRB	608/ 8082
PCB-1242	ND	0.5	ug/L	07/05/03		JRB	608/ 8082
PCB-1248	ND	0.5	ug/L	07/05/03		JRB	608/ 8082

Client ID: FLETCHER PAINT 041,080 Phoenix I.D.: AE90629

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB-1254	ND	0.5	ug/L	07/05/03		JRB	608/ 8082
PCB-1260	ND	0.5	ug/L	07/05/03		JRB	608/ 8082
PCB-1262	ND	0.5	ug/L	07/05/03		JRB	608/ 8082
PCB-1268	ND	0.5	ug/L	07/05/03		JRB	608/ 8082
QA/QC Surrogates							
% DCBP (Surrogate Rec)	74		%	07/05/03		JRB	608/ 8082
% TCMX (Surrogate Rec)	106		%	07/05/03		JRB	608/ 8082

Comments: ND=Not detected BDL = Below Detection Limit RL=Reporting Limit

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

Phyllis Shiller, Laboratory Director
July 09, 2003

PHOENIX

Environmental Laboratories, Inc.
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06040
Tel. (860) 645-1102 Fax (860) 645-0823

Analysis Report

July 09, 2003

FOR: Attn: Mr. Mike Oliver
Waste Tech Services
640 Park Place
Niagara Falls, NY 14301

Sample Information		Custody Information		Date	Time
Matrix:	SOIL	Collected by:	VG	07/02/03	10:20
Location Code:	WASTETEC	Received by:	KJB	07/02/03	17:30
Rush Request:	RUSH#	Analyzed by:	see "By" below		
P.O.#:					

SDG I.D.: GAE90624
Phoenix I.D.: AE90630

Laboratory Data

Client ID: FLETCHER PAINT 095,042,075

Parameter	Result	RL	Units	Date	Time	By	Reference
TCLP Silver	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Arsenic	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Barium	0.16	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Cadmium	0.006	0.005	mg/L	07/07/03		EK	E1311/SW6010
TCLP Chromium	BDL	0.01	mg/L	07/07/03		EK	E1311/SW6010
TCLP Lead	BDL	0.015	mg/L	07/07/03		EK	E1311/SW6010
TCLP Selenium	BDL	0.05	mg/L	07/07/03		EK	E1311/SW6010
TCLP Mercury	BDL	0.001	mg/L	07/07/03		RS	E1311/E245.1
Percent Solid	97		%	07/03/03		MR/	E160.3
Corrosivity	Negative	NONE	None	07/03/03		EG	S423/E150.1
Flash Point	>200	200	degree F	07/03/03		JR	SW846 - 1010
Ignitability	Passed	140	deg F	07/03/03		JR	SW846 - 1010
pH	8.26	0.10	pH Units	07/03/03	8:15	EG	E150.1/SW9045
Reactivity Cyanide	BDL	1.0	mg/Kg	07/07/03		PJ	SW 846-7.3
Reactivity Sulfide	BDL	20	mg/Kg	07/07/03		PJ	SW846-7.3
Reactivity	Negative			07/07/03		PJ	SW 846-7.3
Soil Extraction for PCB	Completed			07/03/02		H/M	3545/3550
TCLP Digestion Mercury	Completed			07/07/03		TR	E1311/7470
TCLP Extraction Metals	Completed			07/02/03		M/Z	EPA 1311
TCLP Metals Digestion	Completed			07/03/03		Z/H	SW846 - 3005
Polychlorinated Biphenyls							
PCB-1016	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1221	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1232	ND	400	ug/Kg	07/07/03		JRB	SW 8082

Client ID: FLETCHER PAINT 095,042,075 Phoenix I.D.: AE90630

Parameter	Result	RL	Units	Date	Time	By	Reference
PCB-1242	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1248	38000	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1254	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1260	12000	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1262	ND	400	ug/Kg	07/07/03		JRB	SW 8082
PCB-1268	ND	400	ug/Kg	07/07/03		JRB	SW 8082
QA/QC Surrogates							
% DCBP (Surrogate Rec)	diluted out		%	07/07/03		JRB	SW 8082
% TCMX (Surrogate Rec)	diluted out		%	07/07/03		JRB	SW 8082

Comments: ND=Not detected BDL = Below Detection Limit RL=Reporting Limit

A mix of Arochlors was present in chromatogram.

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

Phyllis Shiller

Phyllis Shiller, Laboratory Director
July 09, 2003

EST ENVIRONMENTAL SAMPLING TECHNOLOGY
51 Fremont Street
Needham, MA 02494
Tel: (781) 455-0003
Fax: (781) 455-8336

CHAIN OF CUSTODY RECORD

Laboratory: Phoenix Labs

CLIENT: Phoenix Labs
ADDRESS:
CONTACT: Andy Phelan
TEL: 800 1645 1402 FAX:

SITE: Fletcher Paint
ADDRESS: 39 Elm St. (101A) Milford, NH
CONTACT: Mike Sidlowska
DESCRIPTION: Drum Sampling

CONTAINER TYPE
P — Plastic
G — Glass
V — VOA
B — Bacteria

SAMPLE TYPE
1. Wastewater
2. Groundwater
3. Drinking Water
4. Soil
5. Surface Water
6. Other Drum H2O
7. PPE

EST Invoice To:
Lab Invoice To:
Lab Report To:
Reference:
Turnaround Time:
☐ ROUTINE
☐ RUSH ____ DAY(S)

LOCATION (SAMPLE IDENTIFICATION)	SAMPLE TYPE	CONTAINER SIZE	CONTAINER TYPE	CONTAINER #	SAMPLING DATE	SAMPLING TIME	PRESERVATIVE	PCB, TCLP 12 Metals	VOC's	COMMENTS
001, 005, 008, 013, 020	4	4oz 8oz	G	3	7/2/03	1010	none	X	X	90624
027, 029, 031, 033, 037	4	↓	↓	3	↓	1015	↓	X	X	90625
039, 049, 074, 077, 080	4	↓	↓	3	↓	1020	↓	X	X	90626
017, 023, 025, 043, 046	4	↓	↓	3	↓	1035	↓	X	X	90627
055, 057, 063, 066, 085	4	↓	↓	3	↓	1040	↓	X	X	90628
041, 080	6	1L	G	2	↓	1200	↓	X	X	90629
095, 042, 075	7	8oz	G	2	↓	1020	↓	X		90630

Waste Tech Services
640 Park Place
Niagara Falls, NY
Mike Oliver
P = 716-282-4100 14301
Fax = 716-282-1981

Sampler's Name (print)	Signature
Vanessa Gourde	

ADDITIONAL COMMENTS:

TRANSFERS RELINQUISHED BY	TRANSFERS ACCEPTED BY	DATE	TIME
Vanessa Gourde	[illegible]	7/2/03	1535
[illegible]	[illegible]	7-2-03	1745

ENVIRONMENTAL GROUP, INC.
60 Commerce Drive, Buffalo, NY 14218
www.hazmatinc.com

FAX (716) 827-7217
(716) 827-7200

HAZMAT

NYDEC #9A-278
EPA ID# NYD980769947

DATE / /

PICK UP

SHIPPER

NAME: FLETCHER PAINT WORKS

STREET: 39 ELM STREET

CITY: MILFORD STATE: NH ZIP CODE: 03055

CONTACT NAME: PHONE:

SCHEDULED TIME

DELIVERY

CONSIGNEE

NAME: WASTE MANAGEMENT

STREET: 1550 BALMER ROAD

CITY: MOUNT CITY STATE: NY ZIP CODE: 14107

CONTACT NAME: PHONE:

[redacted]

ADDITIONAL INFORMATION / EQUIPMENT DAMAGE
If damaged at pickup site, did you send in Equipment Damage Report (EDR) via Qualcomm? Y N Explain damage below.

Pursuant to 6NYCRR 372.2 (b) (2) (iii) HazMat certifies that it is Authorized to deliver this shipment of manifested waste to the TSDF listed on this Bill of Lading. Shipment valuation limits apply from HazMat Rules Publication 101, Item 848.

ADDITIONAL INFORMATION / EQUIPMENT DAMAGE
If damaged at delivery site, did you send in Equipment Damage Report (EDR) via Qualcomm? Y N Explain damage below.

PURCHASE ORDER NO.	WORK ORDER NUMBER	MANIFEST NUMBER	H.M. NUMBER
		NYE 2885 800	2070

LOAD NUMBER	TRACTOR	TRAILER	ROLL OFF BOX	DRIVER NUMBER	DRIVER'S NAME
	221	UNKNOWN	1	FORDJAM	JORDAN, JAMES

EQUIPMENT	MATERIAL DESCRIPTION / MANIFEST NUMBER	QUANTITY
EQUIPMENT TYPE: 1 UNIT# DROPPED: UNIT# PICKED UP: R1321 CONDITION REPORT:	RQ, Polychlorinated Biphenyls, solid, mixture, 9, UN 2315, III 1 CM	EST 10,000 K

PICK UP

PICK UP DATE: 7.24.03

ARRIVAL TIME: 1100 AM PM RELEASE TIME: 1230 AM PM

DAY #2 DATE:

ARRIVAL TIME: AM PM RELEASE TIME: AM PM

TRAILER EMPTY UPON ARRIVAL ☐ YES
(if not, explain below—)

DIP MEASUREMENT (Tankers Only) INCHES

COMMENTS: (EXPLAIN ALL DELAYS)
Load by paperwork

HAZMAT MATERIALS USED (ex. overpacks, etc.): ☑ YES ☐ NO
IF YES EXPLAIN:

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

SHIPPER'S SIGNATURE: Date: 7/24/03

DELIVERY

DRIVER: DAY #1 DATE:

ARRIVAL TIME: AM PM RELEASE TIME: AM PM

DAY #2 DATE: ARRIVAL TIME: AM PM RELEASE TIME: AM PM

DAY #3 DATE: ARRIVAL TIME: AM PM RELEASE TIME: AM PM

TRAILER CLEAN AND EMPTY UPON DEPARTURE ☐ YES ☐ NO
(if not, explain below—)

COMMENTS: (Explain all delays or discrepancies))

IF YES EXPLAIN:

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

CONSIGNEE'S SIGNATURE Date

HAZMAT BILL OF LADING GENERATOR COPY

(732) 462-1001 • FAX (732) 308-0924

N 42482

114 Schoolground Rd.	350 Pigeon Point Road	175 Bartow Muni. Airport	5533 Dunham Road	108 Monahan Avenue	40 Boulevard St.
Branford, CT 06405	New Castle, DE 19720	Bartow, FL 33830	Maple Heights, OH 44137	Dunmore, PA 18512	Sumter, SC 29150
Phone: (203) 483-5964	Phone: (302) 658-2005	Phone: (863) 533-4599	Phone: (330) 835-3473	Phone: (570) 342-7232	Phone: (803) 773-2611
Fax: (203) 483-5984	Fax: (302) 658-6229	Fax: (863) 533-1613	Fax: (330) 835-3732	Fax: (570) 342-7367	Fax: (803) 773-2942

SHIPPER NAME/ADDRESS: [illegible]

PHONE (AREA CODE):

TRACTOR: TRAILER:

APPOINTMENT TIME:

FCI REP. LOADING (PRINT): PROCEDURE: EQUIP. SPOTTED: EQUIP. REMOVED:

TIME AT SHIPPER: MILITARY TIME ONLY:

ARRIVAL TIME: DEPARTURE TIME:

COMMENTS OR DELAYS AT SHIPPER: EQUIPMENT USED:

BROKER:

PO#: WO#:

MANIFEST / DOCUMENT NO.: [illegible]

TYPE	PROPER U.S. D.O.T. SHIPPING NAME	U.S. D.O.T. HAZARDOUS CLASS	NA/UN/NO	PACKING GROUP	NO. CONT.	CONT. TYPE	NET QUANTITY	UNIT MEASURE	WASTE NO.	FORM
1	[illegible]				6	Drs		P		
2										
3										

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION NUMBER:

SHIPPER'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA and the State. The materials described above were consigned to the transporter named. The consignee can and will accept the shipment and has a valid permit to do so if required. I certify that the foregoing is true and correct to the best of my knowledge.

Payment to the contractor for waste removal does not constitute payment to the carrier and if the contractor does not pay the carrier, the shipper is obligated to pay the agreed rate offered to the contractor.

PLEASE PRINT NAME/TITLE: [illegible]

SHIPPER'S SIGNATURE: X [illegible] I HAVE READ THE ABOVE AND UNDERSTAND AND AGREE TO ALL OF ITS CONTENT

DATE LOADED: [illegible] MO. DAY YEAR

CONSIGNEE NAME/ADDRESS: [illegible]

PHONE (AREA CODE):

TRACTOR: TRAILER:

APPOINTMENT TIME:

FCI REP. UNLOADING (PRINT): PROCEDURE: EQUIP. SPOTTED: EQUIP. REMOVED:

TIME AT CONSIGNEE: MILITARY TIME ONLY:

ARRIVAL TIME: DEPARTURE TIME:

COMMENTS OR DELAYS AT CONSIGNEE: EQUIPMENT USED:

PLEASE PRINT NAME/TITLE: CONSIGNEE SIGNATURE: X DATE UNLOADED: MO. DAY YEAR

AR H-0257	MD HWH-167	MO H-1490	OH UPW-0190713-OH	TX 40705
CT OT HW-307	2001-OP-2335	ND WH-123	OK UPW-0190713-OH	WI 11602
DE DE HW-203	ME MEHWH-47	NH NH-001	ONTARIO, CANADA A 840943	WV UPW-0190713-OH
DE SW-203	ME WD-47	NJ S-2205	PA PA-AH-0067	
IL UPW-0190713-OH	MI UPW-0190713-OH	NY 15599	QUEBEC, CANADA QC-6ML-047	
MA MA-294	MN UPW-0190713-OH	NY NJ-118	RI RI-535	

White - FCI Original
Yellow - FCI Billing
Blue - FCI Office/Customer
Green - Retained by TSDF
Gold - Retained by Generator

N 42482

NYG 2885814

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/5/99)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NHD001079649 | Manifest Doc. No. 0001 | 2. Page 1 of 1 | Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address: USEPA Region I - Fletcher Paint Site, 1 Congress St., Suite 1100, Boston MA 02114

4. Generator's Telephone Number: (617) 918-1244

5. Transporter 1 (Company Name): Hazmat Environmental Group | 6. US EPA ID Number: NYD980769947

7. Transporter 2 (Company Name) | 8. US EPA ID Number

9. Designated Facility Name and Site Address: CWM Chemical Services, LLC, 1550 Balmer Road, Model City NY 14107 | 10. US EPA ID Number: NYD049836679

A. NYG 2885814

B. Generator's ID: 21/39 Elm Street, Milford, NH 03055

C. State Transporter's ID: 1328837 NY

D. Transporter's Telephone: (716) 827-7200

E. State Transporter's ID

F. Transporter's Telephone ( )

G. State Facility ID

H. Facility Telephone: (716) 754-8231

GENERATOR

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Polychlorinated biphenyls, Solid, Mixture, 9, UN2315, III	001	CM	Est. 10000	K	EPA D007
					STATE
b.					EPA
					STATE
c					EPA
					STATE
d.					EPA
					STATE

J. Additional Descriptions for Materials listed Above

a | c

b | d

K. Handling Codes for Wastes Listed Above

a: L | c:

b: | d:

15. Special Handling Instructions and Additional Information: RQ#1 1000 Lb Soil/Spoils c/w PCB
a. CR7840 ERG# 171 b. EXS#9449 SRF Approm For Disposal 7/24/03
c. Emergency Contact: 315-446-9120 Attn: Corey Averill
d. COD Required EPA Site# 0101085

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: JANIS K. TSANG | Signature: Janis K. Tsang for EPA Region I | Mo. 07 Day 24 Year 03

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Daniel Brown | Signature: Daniel Brown | Mo. 07 Day 24 Year 03

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name | Signature | Mo. | Day | Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name | Signature | Mo. | Day | Year

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

You Are Writing Through Eight Copies (See Reverse Side)

NYG2885814

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/5/99)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NHD001079649 | Manifest Doc. No. 0001 | 2. Page 1 of 1

Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address: USEPA Region I - Fletcher Paint Site
1 Congress St., Suite 1100
Boston MA 02114

4. Generator's Telephone Number: (617) 918-1244

A. NYG2885814

B. Generator's ID: 21/39 Elm Street, Milford, NH 03055

5. Transporter 1 (Company Name): Hazmat Environmental Group | 6. US EPA ID Number: NYD980769947

C. State Transporter's ID: 252887 NY

D. Transporter's Telephone: (716) 827-7200

7. Transporter 2 (Company Name) | 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Telephone: ( )

9. Designated Facility Name and Site Address: CWM Chemical Services, LLC, 1550 Balmer Road, Model City NY 14107 | 10. US EPA ID Number: NYD049836679

G. State Facility ID

H. Facility Telephone: (716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Polychlorinated biphenyls, Solid, Mixture, 9, UN2315, III	001	CM	10000	K	EPA B007 / STATE
b.					EPA / STATE
c					EPA / STATE
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above: a. | b. | c. | d.

K. Handling Codes for Wastes Listed Above: a. L | b. | c. | d.

15. Special Handling Instructions and Additional Information: RO#1 10000 Kg Soil/Spoils c/w PCB
a.CR7840 ERG# 171 b.WTS#9449 SR# Accum For Disposal 7/24/02
c.Emergency Contact: 315-446-9120 Attn: COREY AVERILL
d.COD Required EPA Site# 0101085

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: JANIS K. TSANG | Signature: Janis K. Tsang for US EPA Region I | Mo. 07 Day 24 Year 03

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Daniel Rocco | Signature: [signature] | Mo. 07 Day 24 Year 03

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Mo. Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Mo. Day Year

GENERATOR

TRANSPORTER

FACILITY

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

NYG 2885805

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/5/99)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NHD001079649 | Manifest Doc. No.: 00002 | 2. Page 1 of: 1 | Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address: USEPA Region I - Fletcher Paint Site, 1 Congress St., Suite 1100, Boston MA 02114

4. Generator's Telephone Number: (617) 918-1244

A. NYG 2885805

B. Generator's ID: 21/39 Elm Street, Milford, NH 03055

5. Transporter 1 (Company Name): Hazmat Environmental Group | 6. US EPA ID Number: NYD980769947 | C. State Transporter's ID: 23287 NY

D. Transporter's Telephone: (716) 827-7200

7. Transporter 2 (Company Name) | 8. US EPA ID Number | E. State Transporter's ID

F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address: CWM Chemical Services, LLC, 1550 Balmer Road, Model City NY 14107 | 10. US EPA ID Number: NYD049836679

G. State Facility ID

H. Facility Telephone: (716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Polychlorinated biphenyls, solid, Mixture, 9, UN2315, III	001	CM	10000 Est.	K	EPA D007 / STATE
b.					EPA / STATE
c					EPA / STATE
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above: a. | b. | c. | d.

K. Handling Codes for Wastes Listed Above: a. L | b. | c. | d.

15. Special Handling Instructions and Additional Information
a.CR7841 ERGP 171 b.WT69449 SSA 10000 kg PPE/Crushed Drums/Poly Accum. for Disposal 7/24/03
c.Emergency Contact: 315-446-9180 Attn.: Corey Averill
d.COD Required EPA Site# 0101035

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: JANIS K. TSANG | Signature: Janis K. Tsang for USEPA Region 1 | Mo. 07 Day 24 Year 03

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: James Jordan | Signature: James Jordan | Mo. 07 Day 24 Year 03

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Mo. | Day | Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Mo. | Day | Year

GENERATOR

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

COPY 3—Disposer State - Mailed by Generator

NYG2885805

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/5/99)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NHD001079649
Manifest Doc. No.: 00002
2. Page 1 of 1

Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address: USEPA Region I - Fletcher Paint Site
1 Congress St., Suite 1100
Boston MA 02114

4. Generator's Telephone Number: (617) 918-1244

A. NYG2885805

B. Generator's ID: 21/39 Elm Street
Milford, NH 03055

5. Transporter 1 (Company Name): Hazmat Environmental Group
6. US EPA ID Number: NYD980769947

C. State Transporter's ID: 7328589 NY

D. Transporter's Telephone: (716) 827-7200

7. Transporter 2 (Company Name)
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address: CWM Chemical Services, LLC
1550 Balmer Road
Model City NY 14107

10. US EPA ID Number: NYD049836679

G. State Facility ID

H. Facility Telephone: (716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Polychlorinated biphenyls, solid, Mixture, 9, UN2315, III	001	CM	10000	K	EPA B007 / STATE
b.					EPA / STATE
c					EPA / STATE
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above
a
b
c
d

K. Handling Codes for Wastes Listed Above
a: L
b
c
d

15. Special Handling Instructions and Additional Information
a.CR7841 ERG# 171 b.WTS#9449 SR# 10000 kg PPE/Crushed Drums/Poly Accum. for Disposal 7/24/03
c.Emergency Contact: 315-446-9120 Attn: Corey Averill
d.COD Required EPA Site# 0101085

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: JANIS K. TSANG
Signature: Janis K. Tsang for USEPA Region 1
Mo. 07 Day 24 Year 03

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: James Jordan
Signature: James Jordan
Mo. 07 Day 24 Year 03

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Mo. Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Mo. Day Year

GENERATOR

TRANSPORTER

FACILITY

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

COPY 1—Disposer State—Mailed by TSD Facility

NYG 3072105

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple.

(Hazardous Waste Manifest 1/5/99)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NHD001079649000 04
Manifest Doc. No.:
2. Page 1 of: 1
Information within heavy bold line is not required by Federal Law.

A. NYG 3072105

3. Generator's Name and Mailing Address: USEPA Region I - Fletcher Paint Site
1 Congress Street, Suite 1100
Boston, MA 02114

B. Generator's ID: 21/39 Elm St.
Milford, NH 03055

4. Generator's Telephone Number: (617) 918-1244

5. Transporter 1 (Company Name): Freehold Cartage, Inc.
6. US EPA ID Number: NJD054126164

C. State Transporter's ID: 05-22/27 MC

D. Transporter's Telephone: (732) 462-1001

7. Transporter 2 (Company Name)
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Telephone: ( )

9. Designated Facility Name and Site Address: CWM Chemical Services, LLC
1550 Balmer Road
Model City, NY 14107

10. US EPA ID Number: NYD049836679

G. State Facility ID

H. Facility Telephone: (716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Polychlorinated Biphenyls, Solid, mixture 9, UN2315, III	001	DM	75	K	EPA D007 / STATE
b.					EPA / STATE
c					EPA / STATE
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above
a
c
b
d

K. Handling Codes for Wastes Listed Above
a
c
b
d

15. Special Handling Instructions and Additional Information
a. CR7075 ERG#171
b. WTS#7449 SRA
c. Emergency Contact: 315-446-9120 COREY AVERILL
d. EPA SHEA PROJECT

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
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Printed/Typed Name	Signature	Mo.	Day	Year
JANIS K. TSANG	for USEPA Region I	07	23	03

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year
Richard E. Butler		07	23	03

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year

GENERATOR

TRANSPORTER

FACILITY

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

COPY 3 - Disposer State - Mailed by Generator

NYG3072105

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/6/99)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NHD001079649
Manifest Doc. No.: 000004
2. Page 1 of: 1

Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address: USEPA Region I - Fletcher Paint Site
1 Congress Street, Suite 1100
Boston, MA 02114
4. Generator's Telephone Number: (617) 918-1244

A. NYG3072105
B. Generator's ID: 21/39 Elm St, Milford, NH 03055
C. State Transporter's ID: CS22123 NH
D. Transporter's Telephone: (732) 462-1001
E. State Transporter's ID:
F. Transporter's Telephone: ( )
G. State Facility ID:
H. Facility Telephone: (716) 754-8231

5. Transporter 1 (Company Name): Freehold Cartage, Inc.
6. US EPA ID Number: NJD005412164
7. Transporter 2 (Company Name):
8. US EPA ID Number:
9. Designated Facility Name and Site Address: CWM CHEMICAL SERVICES LLC
1550 Balmer Road
Model City, NY 14107
10. US EPA ID Number: NYD049836679

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Polychlorinated Biphenyls, Solid, mixture 9, UN2315, III	001	DM	75	K	EPA B007 / STATE
b.					EPA / STATE
c					EPA / STATE
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above
a.
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a.
b.
c.
d.

15. Special Handling Instructions and Additional Information
a. CRT075 ERG#171
b. WTS#9449 SR#
c. Emergency Contact: 315-446-9120 COREY AVERILL
d. EPA Site# 010185

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
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Printed/Typed Name	Signature	Mo.	Day	Year
JANIS K. TSANG	for USEPA Region I	07	23	03

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year
Richard Bailey		07	23	03

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year

GENERATOR

TRANSPORTER

FACILITY

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

COPY 1—Disposer State—Mailed by TSD Facility

Emergency Contact Telephone Number

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. NHD001079649
Manifest Document No. 0000003
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
USEPA Region I - Fletcher Paint Site
1 Congress St., Suite 1100
Boston MA 02114
4. Generator's Phone (617 918-1244

A. State Manifest Document Number
B. State Generator's ID 21/39 Elm St. Milford, NH 03055

5. Transporter 1 Company Name: Freehold Cartage, Inc.
6. US EPA ID Number: NJD054126164
C. State Transporter's ID 05-32122 NJ
D. Transporter's Phone (732) 462-1001

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
CWM Chemical Services, LLC
1550 Balmer Road
Model City NY 14107
10. US EPA ID Number: NYD049836679
G. State Facility's ID
H. Facility's Phone (716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.		USDOT Non-Hazardous, TSCA Regulated Decon Water	005	DM	1000	K	NONE
b.							
c.							
d.							

J. Additional Descriptions for Materials Listed Above
a. c.
b. d.

K. Handling Codes for Wastes Listed Above
a. T c.
b. d.

15. Special Handling Instructions and Additional Information
See Attached TSCA Continuation Sheet.
a. CR7842 b. WTS#9449 SR#
c. Emergency Contact: 315-446-9120 Attn: COREY AVERILL
d. COD Required EPA Site# 0101085

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

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Printed/Typed Name: JANIS K. TSANG
Signature: [signature] for USEPA Region I
Month Day Year: 10 7 2003

GENERATOR

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name
Signature
Month Day Year

PCB
Manifest Continuation Sheet

Page ____1 of ___1

Generator	USEPA Region 1 – Fletcher Paint Site	***Manifest #*** NY6 3072105	

7/23/2003

Manifest Line Item	Serial Number	Description	Out of Svc. Date	Weight Kgs
111	CR7075-1	Ballast with PCB	7/21/03	~~160~~ 75

Draft for EPA Review

Manifests for PDI IDW Removal
June 22 and 23, 2004

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

TONAWANDA TANK TRANSPORT SERVICE, INC.

1140 MILITARY ROAD
P.O. BOX H
BUFFALO, NY 14217
(716) 873-9703

3990 U.S. ROUTE 42
MASON, OH 45040
(513) 398-6997

DATE 10/07/04

PICK UP	DELIVERY
NAME: GENERAL ELECTRIC CO	NAME: CHEMICAL WASTE MANAGEMENT
STREET: ~~XXXXXXXXX~~ 39 ELM ST	STREET: 1550 BALMER RD
CITY: MILFORD STATE: MA. ZIP CODE:	CITY: MODEL CITY STATE: NY. ZIP CODE:
CONTACT NAME:	CONTACT NAME:
SCHEDULED TIME: 08:00 AM	SCHEDULED TIME:
ADDITIONAL INFORMATION: 20 YARD LOAD & GO	ADDITIONAL INFORMATION:

PURCHASE ORDER NO.	WORK ORDER NUMBER	MANIFEST NUMBER	PRODUCT CODE
	738505		

LOAD NUMBER	TRACTOR NUMBER	TRAILER NUMBER	DRIVER'S NAME
10410037		219/2091	ATTEA

TYPE (CIRCLE ONE)	MATERIAL DESCRIPTION	QUANTITY
TANK (S/S) (R/L) VAC DUMP VAN ROLL-OFF FLATBED		

PICK UP

ARRIVAL TIME: AM PM RELEASE TIME: AM PM

TRAILER EMPTY UPON ARRIVAL: YES NO
(If not, explain below)

DIP/MEASUREMENT (Tankers Only): INCHES

COMMENTS (EXPLAIN ALL DELAYS):

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

X
SHIPPER'S SIGNATURE

DELIVERY

DRIVER: DATE:

ARRIVAL TIME: AM PM RELEASE TIME: AM PM

TRAILER EMPTY UPON DEPARTURE: YES NO
(If not, explain below)

COMMENTS (EXPLAIN ALL DELAYS):

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

X
CONSIGNEE'S SIGNATURE

OFFICE USE ONLY

DRIVER:
TRIP
TOLLS
DEMURRAGE
LAYOVER
VAC
MISC TOTAL:

ACCOUNTING:
DRIVER'S #
FREIGHT
TOLLS
DEMURRAGE
MISC.
TOTAL

WHITE-BILLING COPY YELLOW-TON. TANK COPY PINK-ACCOUNTING COPY GREEN-DRIVER COPY BLUE-TSDF COPY GOLD-GENERATOR COPY

NYG 2720988

Please type or print. Do not staple

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

(Hazardous Waste Manifest 1/5/99)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NND0197944

Manifest Doc. No.: 201988

2. Page 1 of 1

Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address
GE COMPANY
320 GREAT OAKS BLVD STE 319
ALBANY, NY 12203-5963

4. Generator's Telephone Number (518) 862-2712

A. NYG 2720988

B. Generator's ID 39 ELM ST
MILFORD, NH 03055

5. Transporter 1 (Company Name): TONAWANDA TANK TRANSPORT

6. US EPA ID Number: NYD097164801

C. State Transporter's ID: PE 25387

D. Transporter's Telephone (716) 875-9703

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, LLC
1550 BALMER RD
MODEL CITY, NY 14107

10. US EPA ID Number: NYD049836979

G. State Facility ID

H. Facility Telephone (716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, POLYCHLORINATED BIPHENYLS, SOLID MIXTURE, 9, UN2315, PGII	001	CM	10000 (EST)	K	EPA STATE 8007
b.					EPA STATE
c					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
a. CW5473 - PCB SOIL & DEBRIS
c
b
d

K. Handling Codes for Wastes Listed Above
a
c
b
d

15. Special Handling Instructions and Additional Information
SAP 736305
PO#
EMERGENCY CONTACT: CHEMTREC # (800) 424-9300 REQ# 171 OUT OF SERVICE DATE: 10-7-04

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
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Printed/Typed Name | Signature | Mo. Day Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: DAVID ATTEA
Signature
Mo. Day Year: 10 07 04

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Mo. Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name | Signature | Mo. Day Year

GENERATOR

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

COPY B - Generator - Retained by Gener

NYG 2720988

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/5/99)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NHD091079649
Manifest Doc. No.: 2014MK
2. Page 1 of: 1

Information within heavy bold line is not required by Federal Law.

A. NYG 2720988

3. Generator's Name and Mailing Address
GE COMPANY
320 GREAT OAKS BLVD STE 319
ALBANY, NY 12203-5965

B. Generator's ID: 39 ELM ST MILFORD, NH 03055

4. Generator's Telephone Number (518) 862-2712

5. Transporter 1 (Company Name): TONAWANDA TANK TRANSPORT
6. US EPA ID Number: NYD091716441

C. State Transporter's ID: AC 25327

D. Transporter's Telephone (716) 692-7713

7. Transporter 2 (Company Name)
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, LLC
1550 BALMER RD
MODEL CITY, NY 14107

10. US EPA ID Number: NYD049836679

G. State Facility ID

H. Facility Telephone (716) 754-8231

11. US DOT Description (including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, POLYCHLORINATED BIPHENYLS, SOLID MIXTURE, 9, UN2315, PGII	001	CK	10000 (EST)	K	EPA STATE B007
b.					EPA STATE
c					EPA STATE
d.					EPA STATE

J. Additional Descriptions for Materials listed Above
a CW5473 - PCB SOIL & DEBRIS
c
b
d

K. Handling Codes for Wastes Listed Above
a
c
b
d

15. Special Handling Instructions and Additional Information
GR# 736305
PO# 100.02.071-BBL
EMERGENCY CONTACT: CHEMTREC @ (800) 424-9300 ERG# 171 OUT OF SERVICE DATE: 10-7-04

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
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GENERATOR — Printed/Typed Name: Leonard Rubio as agent to General Electric
Signature: [signature] as agent to General Electric
Date: Mo. 10 Day 07 Year 04

TRANSPORTER — 17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: DAVID ATTEA
Signature: [signature]
Date: Mo. 10 Day 07 Year 04

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Date: Mo. Day Year

FACILITY — 19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Date: Mo. Day Year

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

COPY 4—Generator State—Mailed by Generator

NYG 2720988

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

Please type or print. Do not staple

(Hazardous Waste Manifest 1/5/99)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: NHD001079649
Manifest Doc. No.: 20988
2. Page 1 of: 1
Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address
GE COMPANY
320 GREAT OAKS BLVD STE 319
ALBANY, NY 12203-5965
4. Generator's Telephone Number (518) 862-2712

A. NYG 2720988
B. Generator's ID 39 ELM ST MILFORD, NH 03055
C. State Transporter's ID AC 25387
D. Transporter's Telephone (716) 875-8705
E. State Transporter's ID
F. Transporter's Telephone ( )
G. State Facility ID
H. Facility Telephone (716) 754-8231

5. Transporter 1 (Company Name): TONAWANDA TANK TRANSPORT
6. US EPA ID Number: NYD097164801
7. Transporter 2 (Company Name)
8. US EPA ID Number

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, LLC
1550 BALMER RD
MODEL CITY, NY 14107
10. US EPA ID Number: NYD049836679

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, POLYCHLORINATED BIPHENYLS, SOLID MIXTURE, 9, UN2315, PGII	001	CM	10000 (EST)	K	EPA / STATE B007
b.					EPA / STATE
c					EPA / STATE
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above
a CW5473 - PCB SOIL & DEBRIS
c
b
d

K. Handling Codes for Wastes Listed Above
a L
c
b
d

15. Special Handling Instructions and Additional Information
SR# 736305
PO# 100.02.071-BBL
EMERGENCY CONTACT: CHEMTREC @ (800) 424-9300 ERG# 171 OUT OF SERVICE DATE: 10-7-04

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.
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Printed/Typed Name	Signature	Mo.	Day	Year
Leanne Rauber as agent to General Electric	Leanne Rauber as agent to General Electric	10	07	04

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year
DAVID ATTEA	[signature]	10	07	04

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Mo.	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Mo.	Day	Year

GENERATOR
TRANSPORTER
FACILITY

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

COPY 3—Disposer State—Mailed by Generator

Draft for EPA Review

Manifests for PDI IDW Removal
October 7, 2004

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

TONAWANDA TANK TRANSPORT SERVICE, INC.

1140 MILITARY ROAD
P.O. BOX H
BUFFALO, NY 14217
(716) 873-9703

3990 U.S. ROUTE 42
MASON, OH 45040
(513) 398-6997

DATE 06 / 23 / 06

PICK UP	DELIVERY
NAME: GENERAL ELECTRIC CO.	NAME: CHEMICAL WASTE MANAGEMENT
STREET: 39 ELM ST	STREET: 1550 BALMER RD
CITY: MILFORD NB. STATE: ZIP CODE:	CITY: MODEL CITY NY. STATE: ZIP CODE:
CONTACT NAME:	CONTACT NAME:
SCHEDULED TIME: 08:00 AM	SCHEDULED TIME: THURS 07:00 AM
ADDITIONAL INFORMATION: 20 YARD LOAD & GO CWM CAN	ADDITIONAL INFORMATION:

CONSIGNEE

PURCHASE ORDER NO.	WORK ORDER NUMBER	MANIFEST NUMBER	PRODUCT CODE
	724218	NYH 1936299	2315
LOAD NUMBER	**TRACTOR NUMBER**	**TRAILER NUMBER**	**DRIVER'S NAME**
10406114	43	219/2045	KRUPNICKI

TYPE (CIRCLE ONE)	MATERIAL DESCRIPTION	QUANTITY
TANK (S/S) (R/L) VAC DUMP VAN ROLL-OFF FLATBED		EST 19,000

PICK UP

ARRIVAL TIME: 8:30 AM/PM RELEASE TIME: AM/PM

TRAILER EMPTY UPON ARRIVAL: [X] YES [ ] NO (If not, explain below)

GAUGE MEASUREMENT (Tankers Only): INCHES

COMMENTS: (EXPLAIN ALL DELAYS)

pull (1) Lyner # 2045
Weight for pick up
4:30 pm

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

X [signature]
SHIPPER'S SIGNATURE

DELIVERY

DRIVER: DATE:

ARRIVAL TIME: AM/PM RELEASE TIME: AM/PM

TRAILER EMPTY UPON DEPARTURE: [ ] YES [ ] NO (If not, explain below)

COMMENTS: (EXPLAIN ALL DELAYS)

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

X
CONSIGNEE'S SIGNATURE

OFFICE USE ONLY

DRIVER		ACCOUNTING	
TRIP		DRIVER'S #	
TOLLS		FREIGHT	
DEMURRAGE		TOLLS	
LAYOVER		DEMURRAGE	
VAC		MISC.	
MISC	TOTAL:	TOTAL	

WHITE-BILLING COPY YELLOW-TON. TANK COPY PINK-ACCOUNTING COPY GREEN-DRIVER COPY BLUE-TSDF COPY GOLD-GENERATOR COPY

FRANK'S VACUUM TRUCK SERVICE, INC.
4500 Royal Avenue • Niagara Falls, New York 14303
(716) 284-2132

83872

NYDEC #9A-332
EPA ID # NYD982792814

PICK UP				DELIVERY			
SHIPPER	NAME: GE			CONSIGNEE	NAME: CHEMICAL WASTE		
	STREET: 39 ELM ST				STREET: 1600 BALMER ROAD		
	CITY: MILFORD, NH	STATE	ZIP CODE		CITY: MODEL CITY, NY	STATE	ZIP CODE
	CONTACT NAME: JEAN BOULEA		413-441-9262		CONTACT NAME: LANCE SAGER		716-754-0366
	SCHEDULED TIME: 06/22/2004	08:00			SCHEDULED TIME: 06/23/2004	07:00	

ADDITIONAL INFORMATION

100 FEET OF HOSE AND DRUM WAND

CUSTOMER P.O. NO.	WORK ORDER NUMBER	MANIFEST NUMBER	BILLING REFERENCE
		UMNA 1083/23	BILLING
LOAD NUMBER: 66384	TRACTOR NUMBER: 65	TRAILER NUMBER: 401-V	DRIVER'S NAME: BLEYR

NUMBER & TYPES	WEIGHT OR VOLUME	HAZ. MAT.	DESCRIPTION OF WASTE(S) PER 49 CFR	CUSTOMER CODE #
1TT			Non-Regulated Material / NON-HAZ	

TYPE (CIRCLE ONE)	PLACARDS PROVIDED OR AFFIXED	WHEN "RQ" QUANTITY RELEASED INTO ENVIRONMENT, IMMEDIATELY NOTIFY NAT. RESPONSE CENTER - 800-424-8802 AND 911 EMERGENCY SYSTEM OR LOCAL OPERATOR	EMERGENCY RESPONSE PHONE NUMBER:
TANK (S/S) (R/L)	N/A		
VAC	SHIPPER'S CHECK LIST		
DUMP	DOT LABELS APPLIED AND SECURE: ✓	DOT AUTHORIZED CONTAINERS: ✓	
VAN			
ROLL-OFF	PROPER DOT NAME ON ALL PACKAGES: ✓	CHECKED FOR PROPER SEALING: ✓	
FLATBED			

PICK UP

ARRIVAL DATE _____

ARRIVAL TIME _____ AM PM RELEASE TIME 2:00 AM PM

TRAILER EMPTY UPON ARRIVAL ☐ YES ☐ NO
(If not, explain below)

DIP MEASUREMENT (Tankers Only) _____ INCHES

COMMENTS: (EXPLAIN ALL DELAYS) _____

SHIPPERS CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

X _____ TITLE _____
SHIPPER'S SIGNATURE

DELIVERY

DRIVER _____ DATE _____

ARRIVAL TIME _____ AM PM RELEASE TIME _____ AM PM

TRAILER EMPTY UPON DEPARTURE ☐ YES ☐ NO
(If not, explain below)

COMMENTS: (EXPLAIN ALL DELAYS) _____

I, THE UNDERSIGNED, CERTIFY THAT THE ABOVE INFORMATION IS TRUE AND COMPLETE.

X _____
CONSIGNEE'S SIGNATURE

GENERATOR

NYH1436274

Please type or print. Do not staple.

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

mailed 6/24/04

(Hazardous Waste Manifest 5/00)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. NHD001079644 Manifest Doc. No. 86274

2. Page 1 of 1

Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address
GE COMPANY
320 GREAT OAKS BLVD, STE 323
ALBANY, NY 12203

4. Generator's Telephone Number (518) 862-2712

A. NYH1436274

B. Generator's ID
39 ELM STREET
MILFORD, NH 03055

5. Transporter 1 (Company Name) Tonawanda Tank

6. US EPA ID Number NYD097644801

C. State Transporter's ID AL2538 7NY

D. Transporter's Telephone 716 873 9703

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, LLC
1550 BALMER RD
MODEL CITY, NY 14107

10. US EPA ID Number NYD049836679

G. State Facility ID

H. Facility Telephone (716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, POLYCHLORINATED BIPHENYLS, SOLID MIXTURE, 9, UN2315, II	001	CM	EST 13608	K	EPA / STATE B007
b.					EPA / STATE
c.					EPA / STATE
d.					EPA / STATE

Copy

J. Additional Descriptions for Materials listed Above
a. CW5473 - TSCA SOIL
c.
b.
d.

K. Handling Codes for Wastes Listed Above
a. L
c.
b.
d.

15. Special Handling Instructions and Additional Information
SR# 724420
PO# 100.02.060 BBL
OUT OF SERVICE DATE: 1/5/04
CHEMTREC EMERGENCY RESPONSE NUMBER 800-424-9300

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

If I am large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a smaller generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Leanne M. Roulier FOR GENERAL ELECTRIC COMPANY
Signature: Leanne M. Roulier FOR GENERAL ELECTRIC COMP.
Mo. Day Year: 06 23 04

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: STEPHAN KRUPNICKI
Signature: [signature]
Mo. Day Year: 06 23 04

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Mo. Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Mo. Day Year

In case of emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

COPY 3-DISPOSER STATE - MAILED BY GENERATOR

STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
DIVISION OF SOLID & HAZARDOUS MATERIALS

NYH1436274

Please type or print. Do not staple.

HAZARDOUS WASTE MANIFEST

P.O. Box 12820, Albany, New York 12212

(Hazardous Waste Manifest 5/00)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA No. NHD009796491 Manifest Doc. No. 136274

2. Page 1 of 1

Information within heavy bold line is not required by Federal Law.

3. Generator's Name and Mailing Address
GE COMPANY
320 GREAT OAKS BLVD, STE 323
ALBANY, NY 12203

4. Generator's Telephone Number (518) 862-2712

A. NYH1436274

B. Generator's ID
39 ELM STREET
MILFORD, NH 03055

5. Transporter 1 (Company Name) Tonawanda Tank

6. US EPA ID Number NYD099644801

C. State Transporter's ID AC25387 NY

D. Transporter's Telephone 716 873 3703

7. Transporter 2 (Company Name)

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Telephone ( )

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, LLC
1550 BALMER RD
MODEL CITY, NY 14107

10. US EPA ID Number NYD049836679

G. State Facility ID

H. Facility Telephone (716) 754-8231

11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)	12. Containers Number	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, POLYCHLORINATED BIPHENYLS, SOLID MIXTURE, 9, UN2315, II	001	CM	EST 13608	K	EPA / STATE B007
b.					EPA / STATE
c.					EPA / STATE
d.					EPA / STATE

J. Additional Descriptions for Materials listed Above
a. CW5473 - TSCA SOIL
b.
c.
d.

K. Handling Codes for Wastes Listed Above
a. L
b.
c.
d.

15. Special Handling Instructions and Additional Information
SR# 724420
PO# 100.02.060 BBL
OUT OF SERVICE DATE: 1/5/04
CHEMTREC EMERGENCY RESPONSE NUMBER 800-424-9300

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and state laws and regulations.

If I am large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR if I am a smaller generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: Leanne M. Roulier FOR GENERAL ELECTRIC COMPANY
Signature: Leanne M. Roulier FOR GENERAL ELECTRIC COMP
Mo. Day Year: 06 23 04

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: STEPHAN KRUPNICKI
Signature: [signature]
Mo. Day Year: 06 23 04

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Mo. Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name
Signature
Mo. Day Year

COPY 1-DISPOSER STATE - MAILED BY TSD FACILITY

In an emergency or spill immediately call the National Response Center (800) 424-8802 and the NYS Department of Environmental Conservation (518) 457-7362

NON-HAZARDOUS MANIFEST

WASTE MANAGEMENT

Please print or type. *(Form designed for use on elite (12-pitch) typewriter.)*

NON-HAZARDOUS MANIFEST

1. Generator's US EPA ID No. NHD001079649 Manifest Document No. 34223

2. Page 1 of 1

A. Manifest Number **WMNA** 10034223

3. Generator's Name and Mailing Address
GE COMPANY
320 GREAT OAKS BLVD, STE 323
ALBANY, NY 12203

4. Generator's Phone (518) 862-2712

B. State Generator's ID
39 ELM STREET
MILFORD, NH 03055

5. Transporter 1 Company Name: FRANK'S HAULOM TRUCK SERVICE

6. US EPA ID Number: NYD982792814

C. State Transporter's ID: AP 76209-NY

D. Transporter's Phone: 716-284-2132

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
CWM CHEMICAL SERVICES, LLC
1550 BALMER RD
MODEL CITY, NY 14107

10. US EPA ID Number: NYD049836679

G. State Facility's ID

H. Facility's Phone: (716) 754-8231

GENERATOR

11. Description of Waste Materials	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol.	I. Misc. Comments
a. NON REGULATED MATERIAL WM Profile # CW5471	001	TF	EST. 012145	G	NA
b. WM Profile #					
c. WM Profile #					
d. WM Profile #					

J. Additional Descriptions for Materials Listed Above

Landfill _____ Solidification _____

Bio Remediation _____

K. Disposal Location

Cell Level

Grid

15. Special Handling Instructions and Additional Information
SR# 724717
PO# 100.02.060 BBL
Purchase Order #

EMERGENCY CONTACT: CHEMTREC @ 800-424-9300

16. GENERATOR'S CERTIFICATION:

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR Part 261 or any applicable state law, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable regulations.

Printed/Typed Name: Leanne M. Roulier
Signature "On behalf of" GENERAL ELECTRIC CO.: Leanne M. Roulier
Month Day Year: 10 6 2 2 04

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Russell Bley
Signature: Russell Bley
Month Day Year: 10 6 2 2 04

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name
Signature
Month Day Year

FACILITY

19. Certificate of Final Treatment/Disposal

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above-described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the dates listed above.

20. Facility Owner or Operator: Certification of receipt of non-hazardous materials covered by this manifest.
Printed/Typed Name
Signature
Month Day Year

CWM - NHM - 1 - 5/97

#1 - TREATMENT, STORAGE, DISPOSAL FACILITY COPY

Appendix D

BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Appendix D

Representative Site Photographs

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Phase 1

BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Phase 1 – Debris/Waste Removal Activities

IDW drums from EPA's 1993 Remedial Investigation and 2000 building demolition activities.

IDW drums and containment area from EPA's 1993 Remedial Investigation and 2000 building demolition activities.

Debris in northwest corner of Elm Street area.

Empty tank/drum in northwest corner of Elm Street area.

Railroad ties in northwest corner of Elm Street area.

Drum consolidation and removal at Elm Street site.

Wood palettes in northwest corner of Elm Street site.

Light ballasts found on Elm Street area during cleaning.

Phase 1 – Site Clearing and Erosion Control Measures

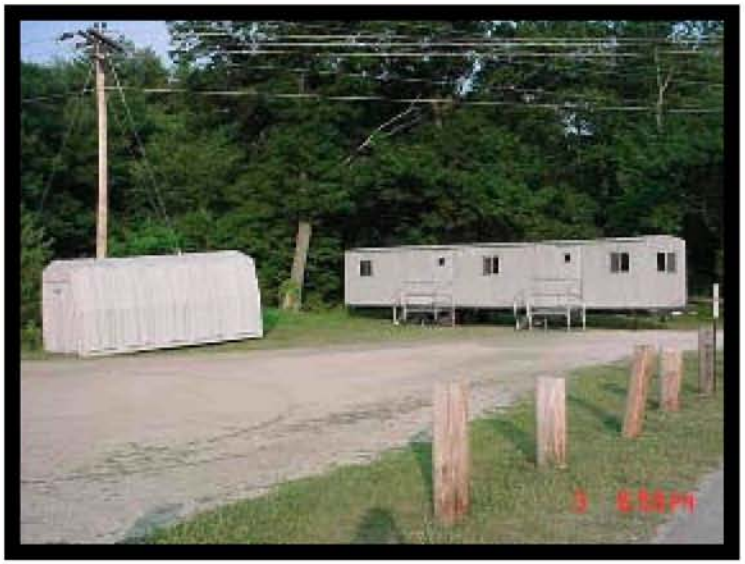
Elm Street area before clearing (front gate).

Elm Street area before clearing (front gate).

Keyes Park access road before clearing.

Silt fence/hay bale construction - Elm Street

Phase 1 – Support Zone Preparation



Office trailer and storage box.

Fence installation.

Fence installation.

Phase 2

BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Phase 2 Elm Street Area

Water and soil IDW storage –
Elm Street Site.

Keyes Park Access Road looking south.

Support zone at Keyes field.

Looking south from Keyes field – Souhegan River.

Looking south from northwest corner of Elm Street Site.

Elm Street Site looking south.

Elm Street Site looking north.

Elm Street Site looking west.
Sand berm adjacent to cemetery

Elm Street Site looking east. Sand berm adjacent to cemetery.

Phase 2 – Mill Street Area

Boston and Maine Railroad and location of monitoring well clusters MW-23 and MW-24.

Mill Street Site looking west.

Mill Street Site looking east.

Phase 2 – Soil Boring, Monitoring Well Installation and Groundwater Monitoring Programs

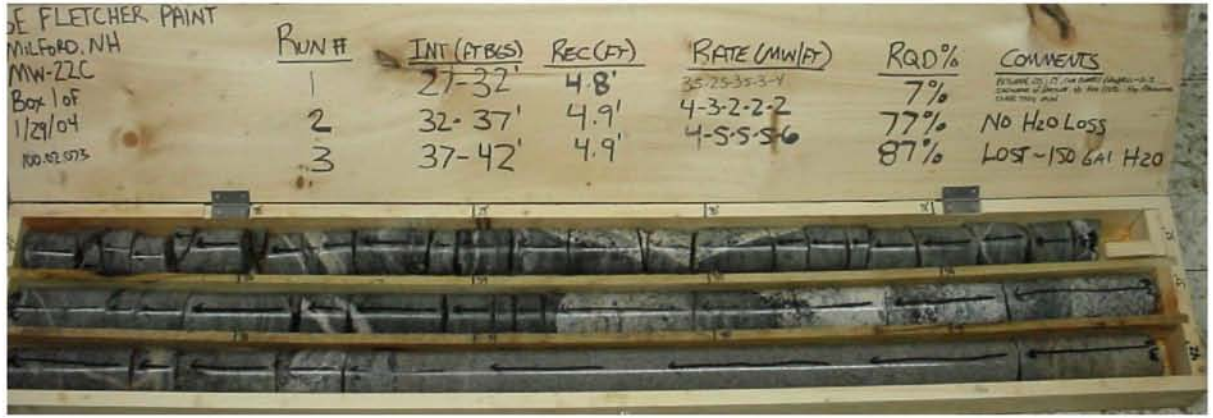
Monitoring well installation program – rock coring.

Soil boring program – direct push rig.

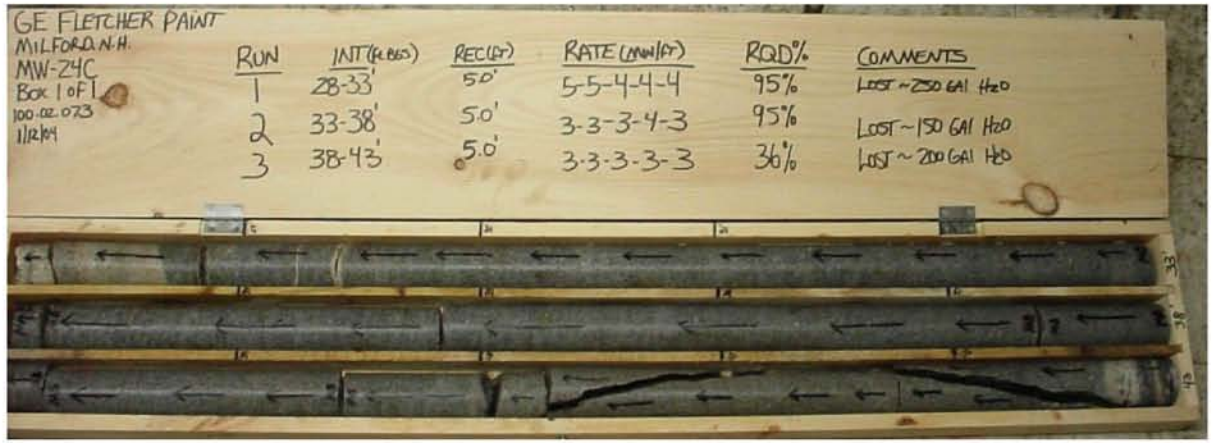
Soil boring program – exclusion zone.

Groundwater sampling program – monitoring groundwater quality parameters.

Groundwater sampling program – sample collection



Rock cores from MW-22C.



Rock cores from MW-24C.

Phase 2 – Test Pitting Program

ESTP-1B: Quarried granite block.

ESTP-1B: Soil and boulders.

ESTP-1C: Soil, cobbles, boulders and quarried granite block

ESTP-2B: Boulders and soil.

ESTP-2C: Soil, cobbles and boulders.

ESTP-2C: Metal impeller.

ESTP-3A: Soil stained with gray paint-like material.

ESTP-3A: Soil stained with gray paint-like material.

ESTP-3C: Miscellaneous soil and non-soil material.

ESTP-3A: Resinous material.

ESTP-3A: Yellow paint-like material.

ESTP-3A: Drum A.

ESTP-3A: Drum A.

ESTP-3B: Drum B.

ESTP-4: Profile view.

ESTP-5: Burn pit materials and soil.

ESTP-5: Burn pit material and soils

ESTP-5: Burn pit material and soils

MSTP-1: Soil.

MSTP-1: Geotextile fabric.

MSTP-1: Concrete pad.

MSTP-2: Soil.

MSTP-3: Metal debris.

MSTP-2: Profile view.

MSTP-3: Profile view.

Appendix E

BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Appendix E

Elm Street Area Retaining Wall Evaluation

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

MERIDIAN
Land Services, Inc.
Telephone: 603-673-1441 • Fax: 603-673-1584
E-Mail: MERIDIAN@MeridianLandServices.COM

Gerard J. Gagne, P. E., C. S. I.
John G. Kelley, L. L. S., P. L. S.
Randolph A. Haight, L. L. S.
James K. Edwards, Jr.
Timothy J. Ferwerda, C. S. S.
David A. Ricard
George F. Keller, L. L. S.

Mr. Terrance Young
Blasland, Bouck & Lee, Inc.
6723 Towpath Road, Box 66
Syracuse, NY 13214-0066

RE: *RETAINING WALL EVALUATION*
General Electric Site (CPA-2309), Elm Street, Milford NH
BBL Project No. 100.02
MLS Project Number 2241.02

Dear Mr. Young,

As authorized in our agreement of November 17, 2003 (Agreement BBL-PS-13049) Meridian Land Services, Inc. investigated the existing stone retaining wall located along the eastern property line of the above captioned site. Field inspections of the site were made on November 19th (photos 1 & 2) and most recently December 19, 2003 of the condition of the wall and the slopes adjacent to the wall. At the time of the inspection, I met with a field representative of Blasland, Bouck & Lee, Inc. (BBL) (Lee-An) coordinating the current boring program on site.

History

The Town of Milford NH had numerous granite quarries throughout the town manufacturing dimensional granite stone used for numerous purposes such as buildings, foundation walls, granite curb, stonewalls, stone culverts with the most renowned pieces of granite being used for columns on the buildings in Washington DC. Much of the less-expensive non-uniform dimensioned stone was used on walls where expense was a concern, which was most likely the case along the cemetery boundary. The rear wall of the Fletcher Paint Building was located adjacent to the cemetery property and may have supported some of this wall.

Soils

A review of soil boring log EB-17 and MW-20A provided by BBL revealed that the site is primarily sands and gravels to a depth of approximately 40 feet.

Site Observation

From site observations the walls along the eastern property line of the above site were irregular dimensioned (see photos 3,4 & 5). Measurements of the stone on the surface of the ground varied in size from 1'Hx1W'x2'L to 1.5'WX1.5'x6' and numerous sizes in between. Although there exists a uniformly dimensional 5 foot high stonewall (see photos 6 & 7) north of the existing Town of Milford Memorial between the Memorial and the existing cemetery, the wall terminates at the property line of the subject site. The remainder of the wall along the subject site adjacent to the cemetery seems to have been removed above grade with only one layer of stone visible above grade. The slopes adjacent to these remaining stones on the subject property site vary from 2.5H:1V to 4H:1V, with the more common slope of 3H:1V supporting the remains of the wall. Beneath these remaining stones there seems to a mortar or concrete base (see photo 9) however without the ability to excavate further one could not determine what exists below grade. On the cemetery side of the remains of the wall the surface grade is approximately 12H:1V, which begins at the base of the wall remains. The wall remains do not provide lateral support to the finish grade

of cemetery in the open areas along the property line. This however this is not the case along the wooded areas of the eastern property line (see photo 8). I understand that no activities are proposed along this section of the property line.

Propose of Wall Investigation

The purpose of this investigation of the wall is to determine if there is a concern as to the wall stability during the boring program currently being undertaken in other areas of the site by BBL. Some boring locations are proposed within a few feet of the face of wall along the 3V:1H and 2:5V:1H slopes (see attached photographs for flagged stakes).

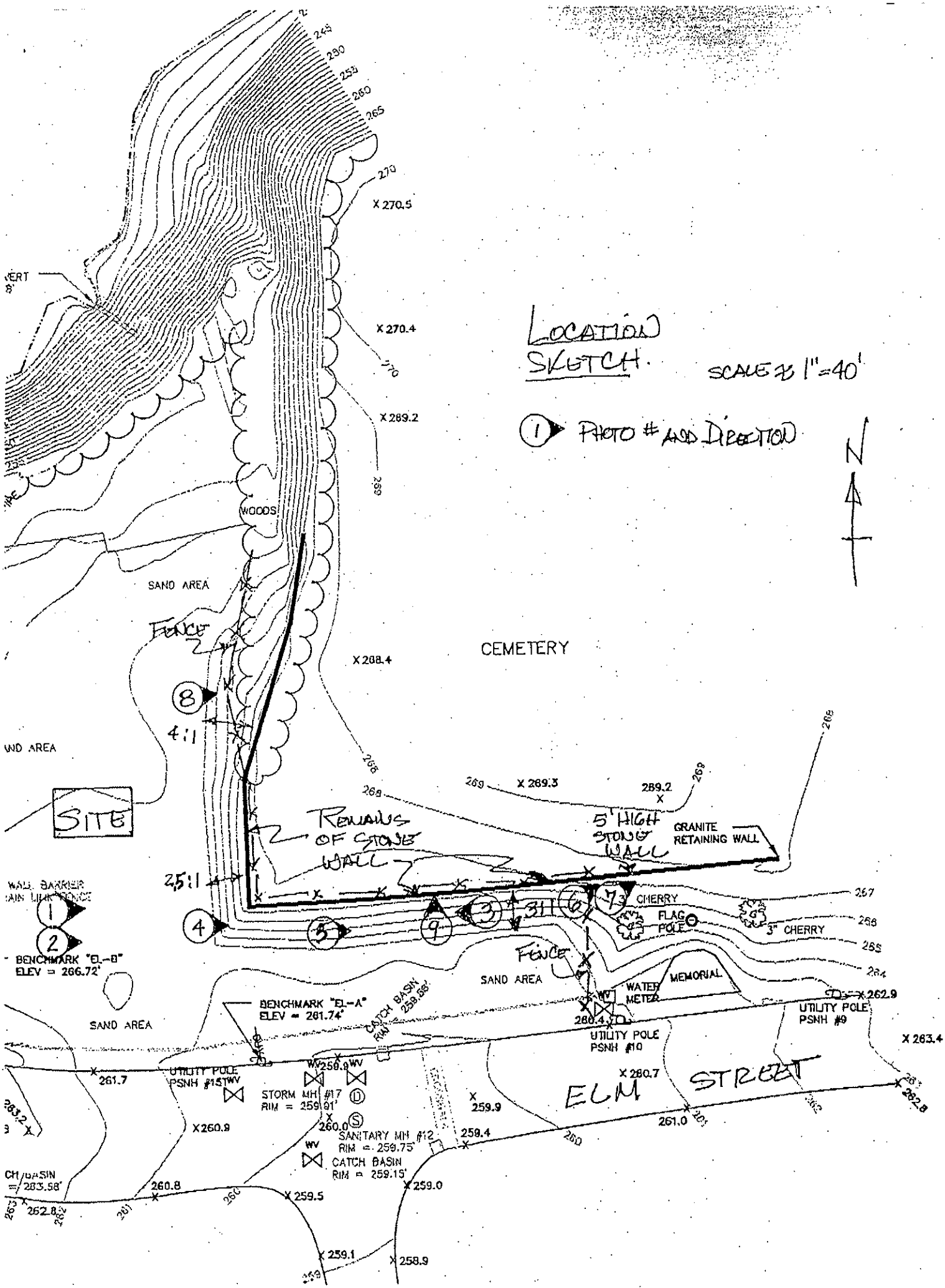
Recommendation

Given the location of the proposed borings along the eastern property line, the stability of the existing slopes and the condition of the current wall between the subject property and the cemetery, we believe that there will not be a lack of wall stability resulting from the development of borings along the eastern property line outside of the wooded areas as long as the existing slopes are maintained, boring holes are backfilled upon completion and any damage to the existing finish grade of the embankment surface is restored to the current final contour upon recovery of the boring data.

Please let me know if we can be of further assistance on the project.

Very Truly Yours
MERIDIAN LAND SERVICES, INC.

Gerard J. Gagne PE
Project Engineer


LOCATION SKETCH.
SCALE: 1"=40'
PHOTO # AND DIRECTION
N
CEMETERY
WOODS
SAND AREA
FENCE
SITE
4:1
2.5:1
REMAINS OF STONE WALL
5' HIGH STONE WALL
GRANITE RETAINING WALL
CHERRY
FLAG POLE
3" CHERRY
MEMORIAL
WATER METER
UTILITY POLE PSNH #9
UTILITY POLE PSNH #10
UTILITY POLE PSNH #15
BENCHMARK "EL-B" ELEV = 266.72'
BENCHMARK "EL-A" ELEV = 261.74'
CATCH BASIN RIM = 259.58'
STORM MH #17 RIM = 259.91'
SANITARY MH #12 RIM = 259.75'
CATCH BASIN RIM = 259.15'
ELM STREET
X 270.5
X 270.4
X 269.2
X 268.4
X 269.3
289.2
X 263.4
X 262.9
X 260.7
X 260.9
X 259.9
X 259.5
X 259.0
X 258.9
261.7
260.8
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261.0
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260.4
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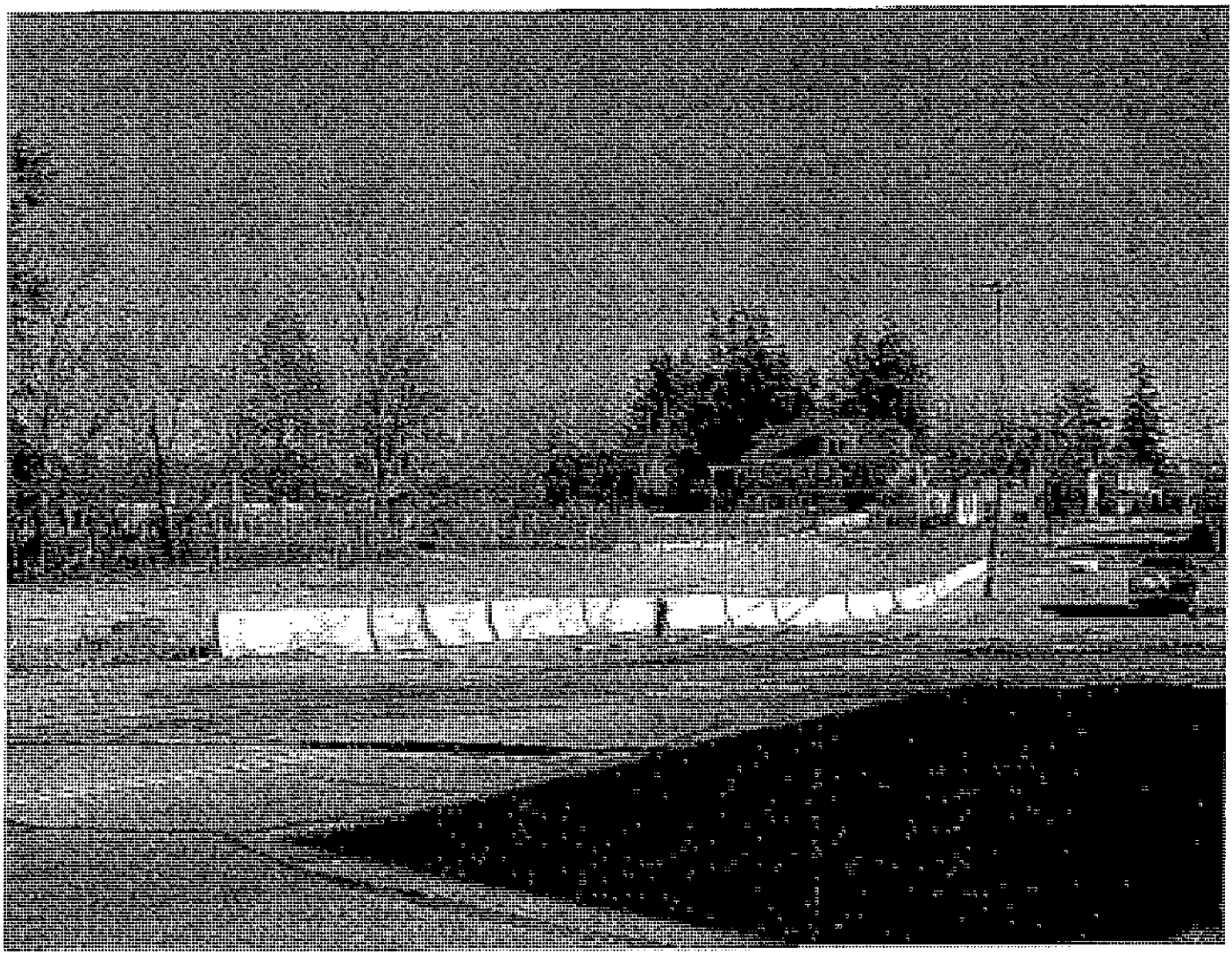
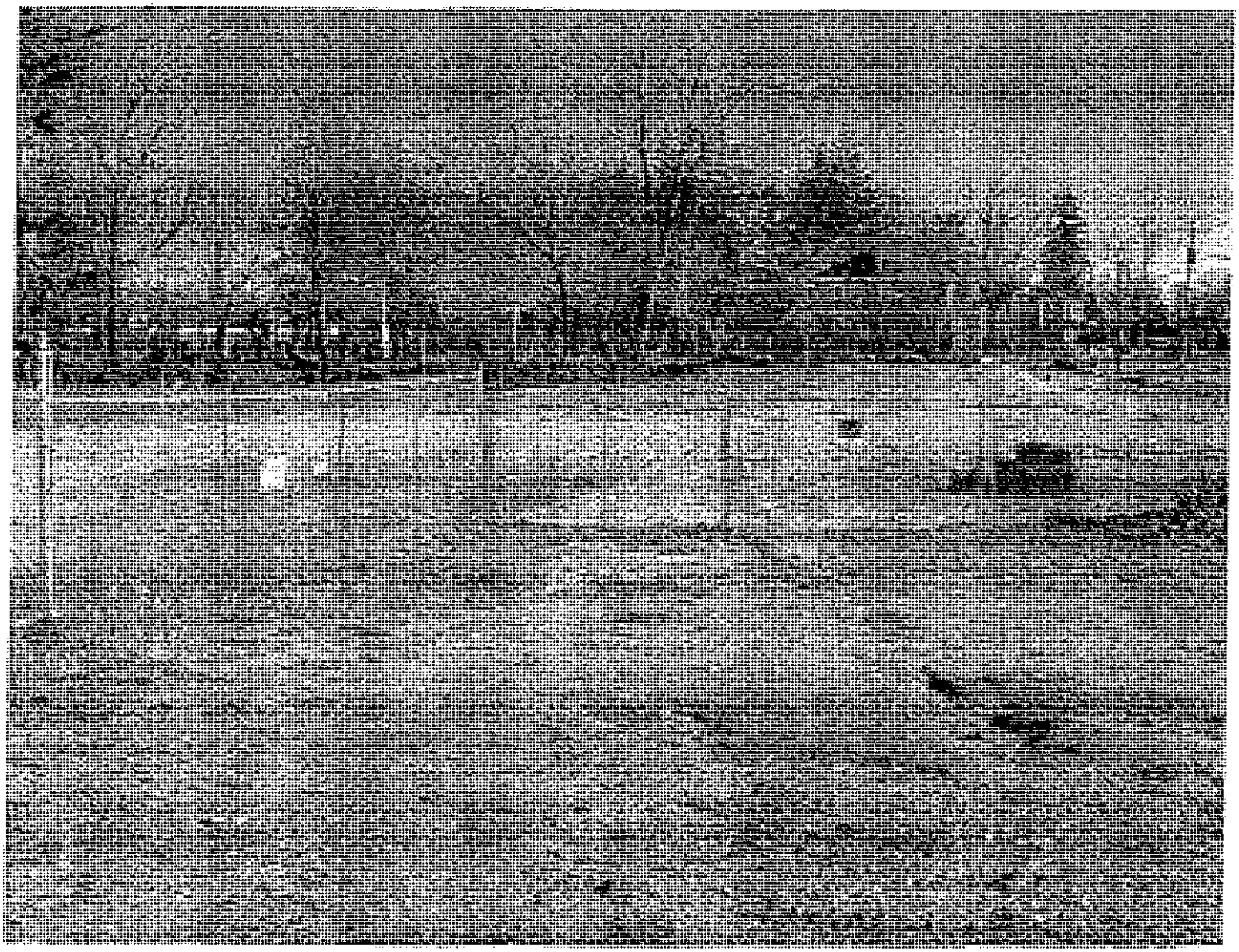
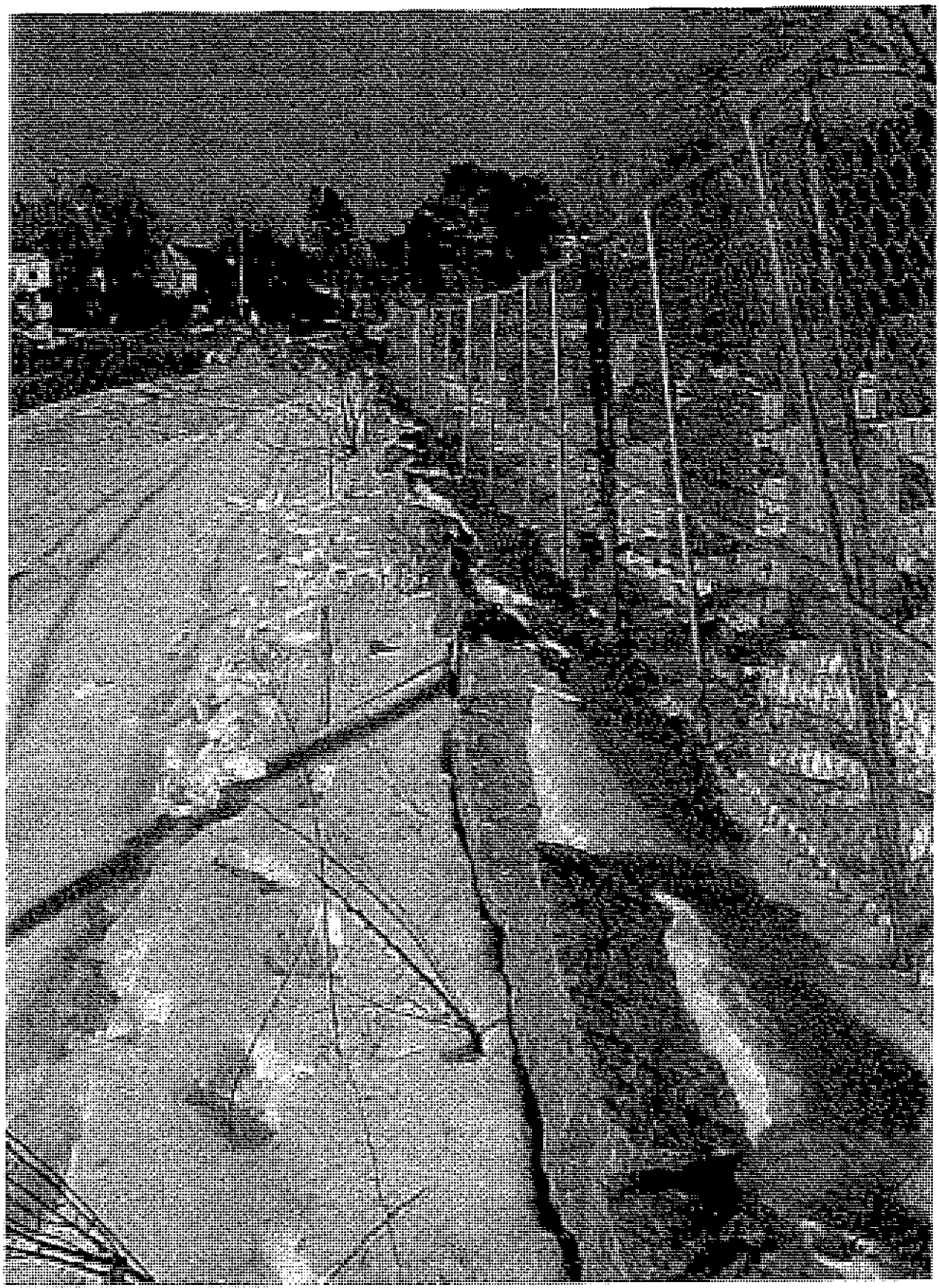
259.1

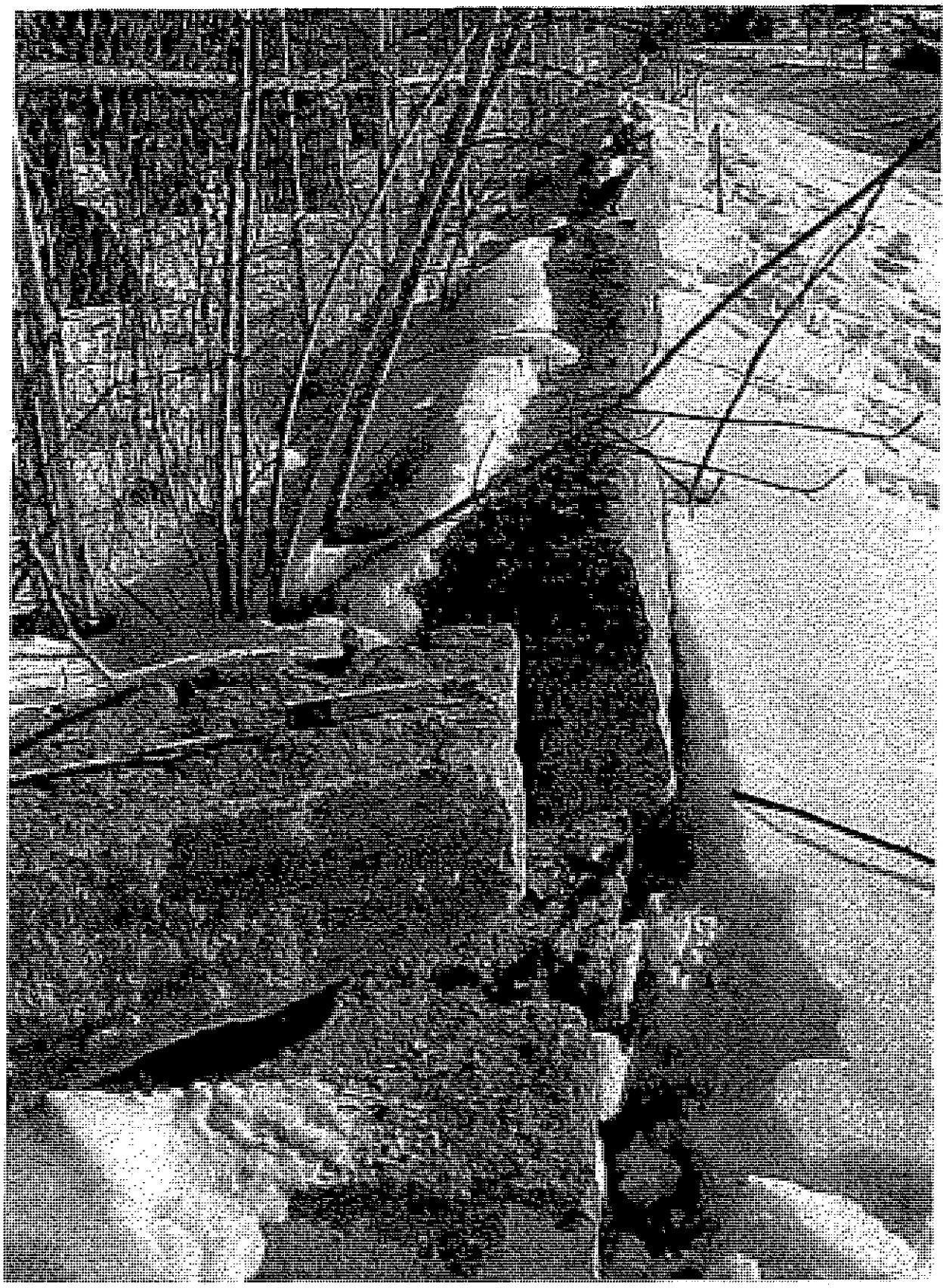






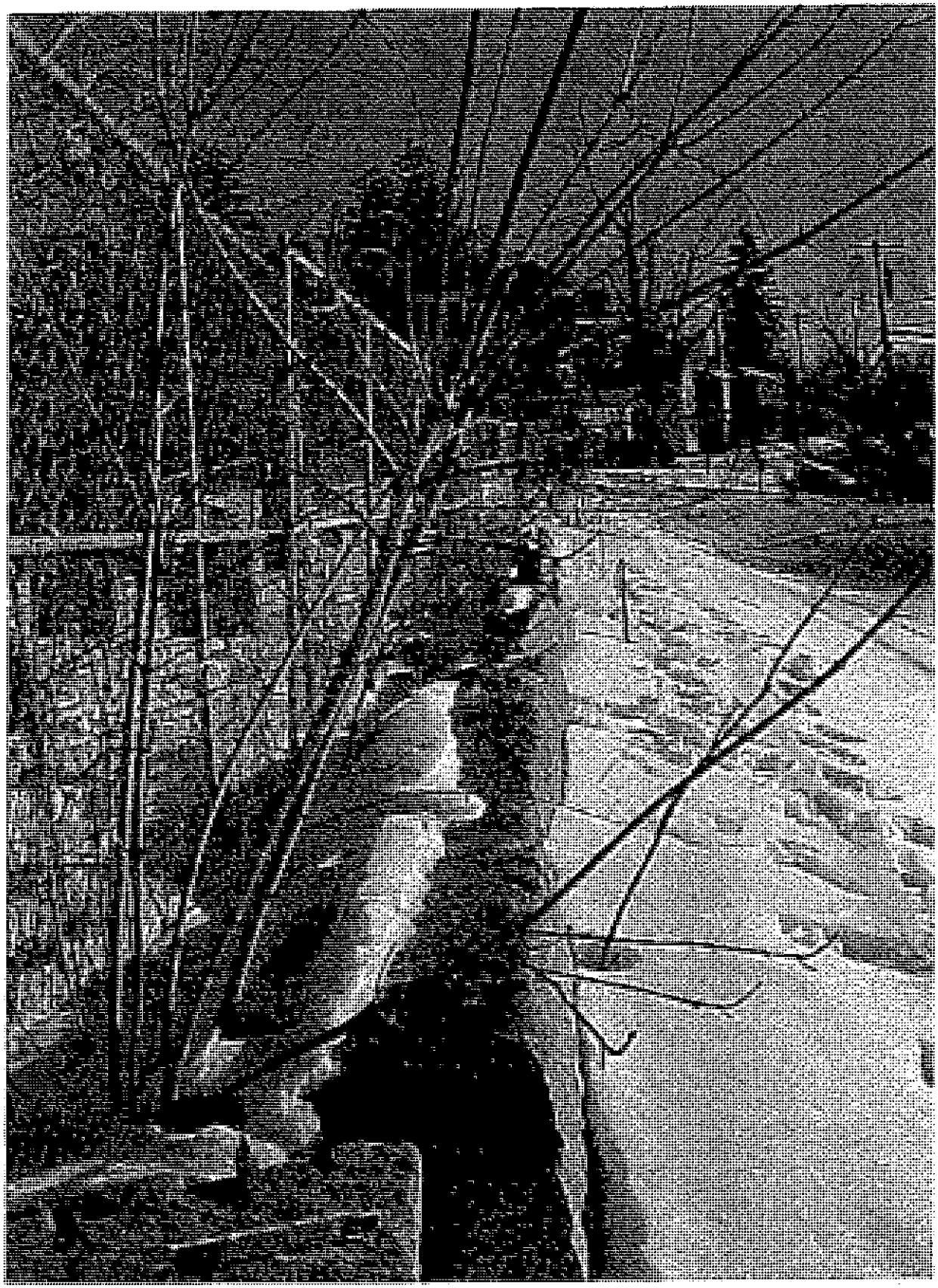
298.JPG.

(3)



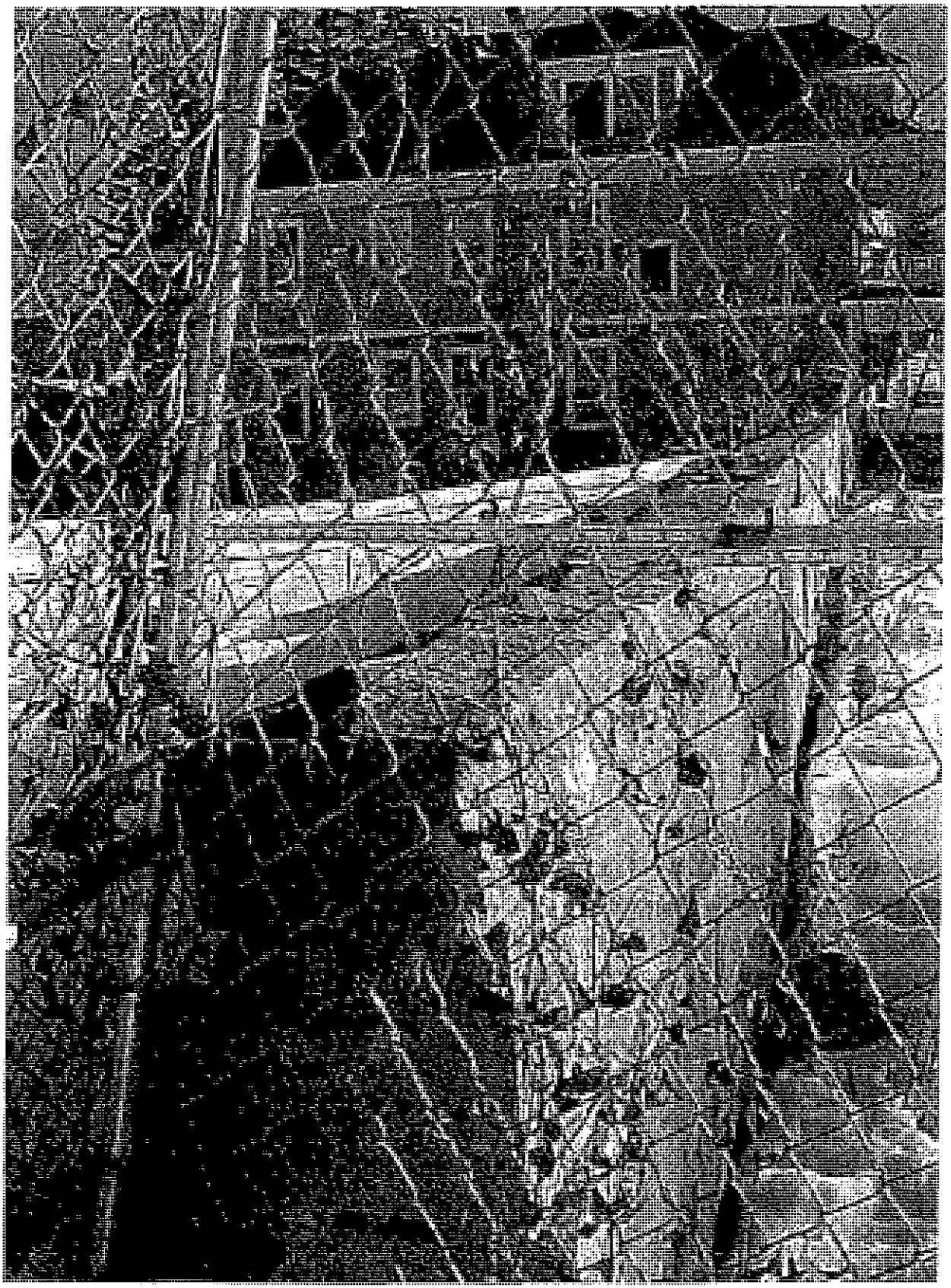
291.JPG

4



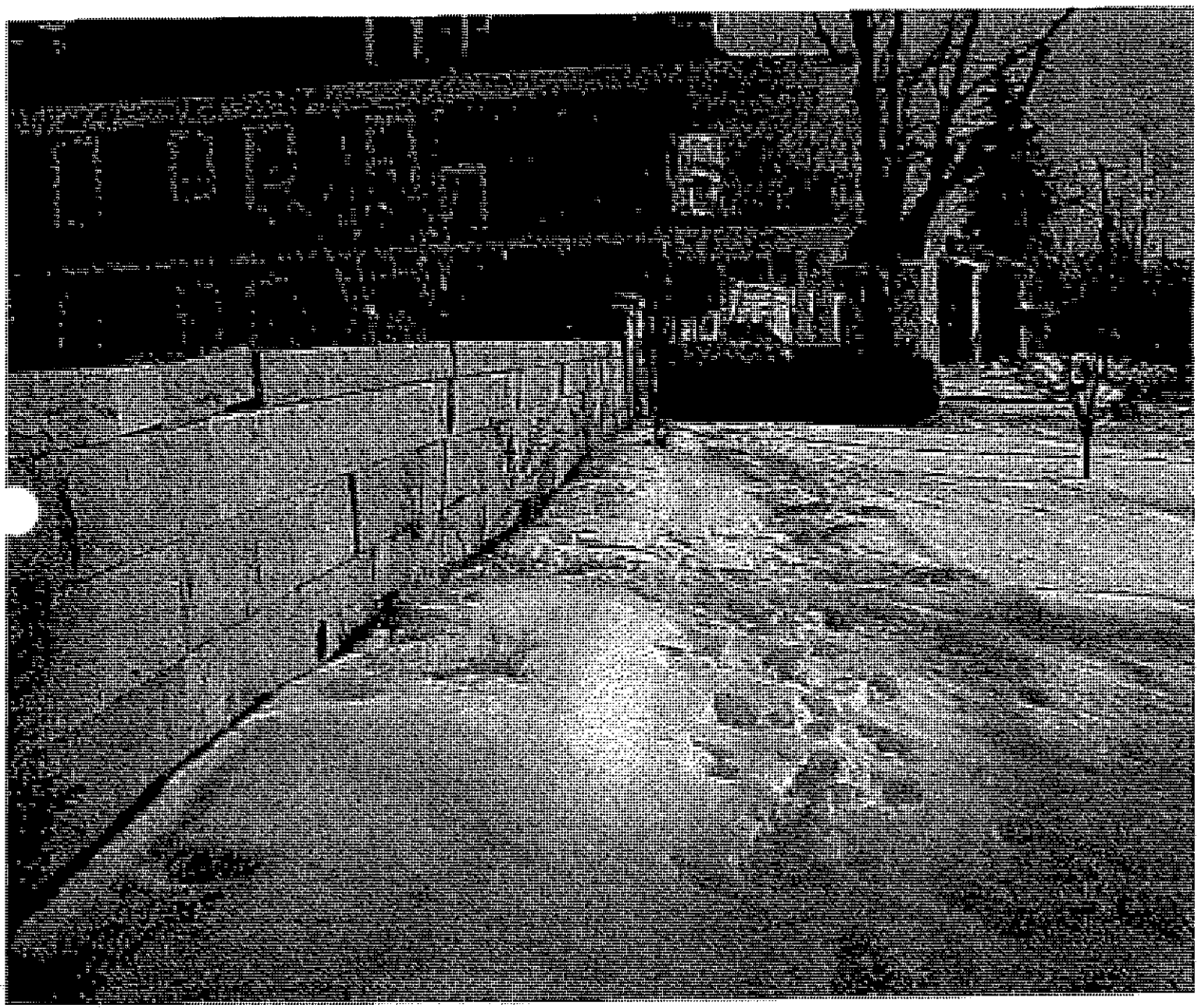
292.JPG

5



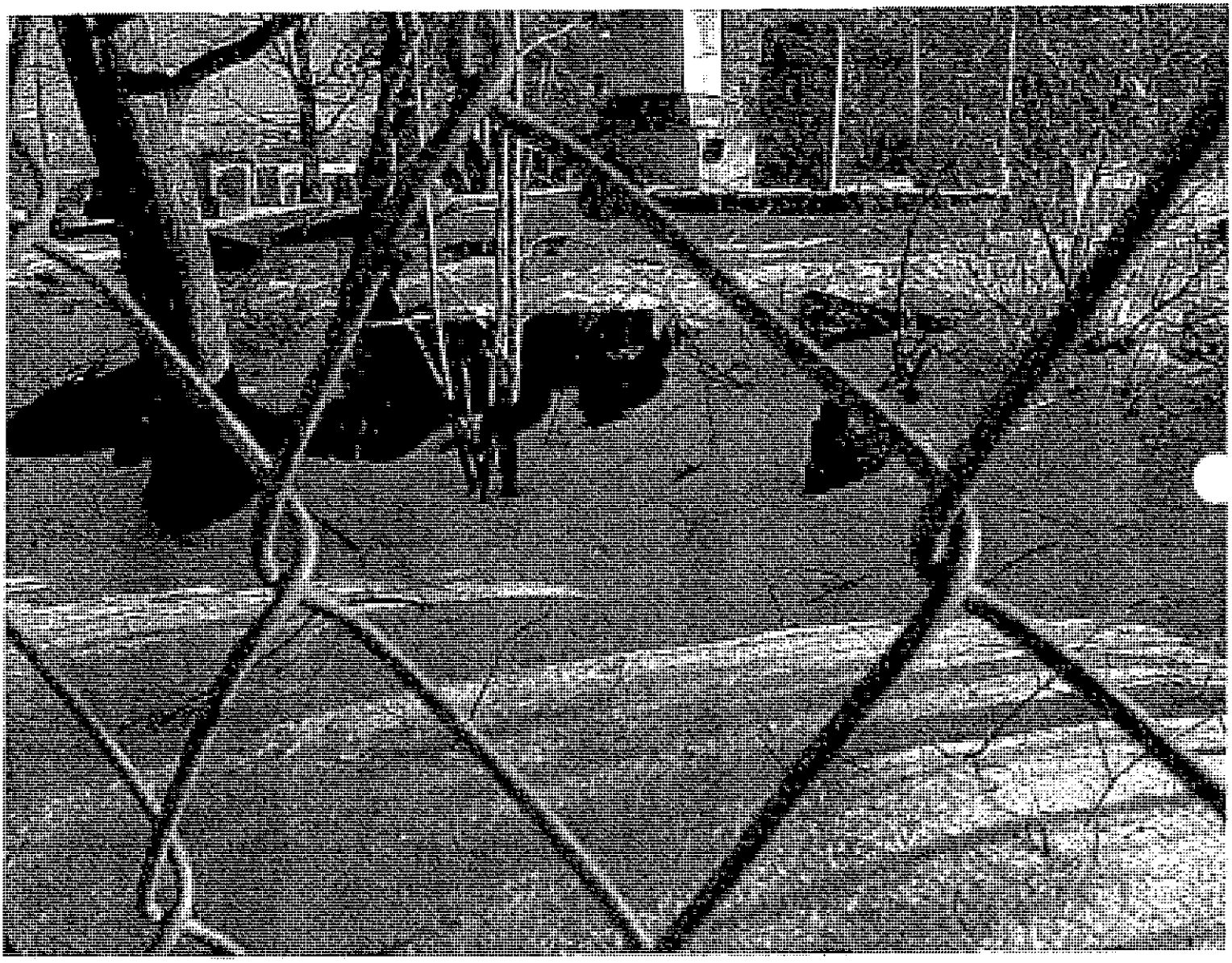
297.JPG

6



294.JPG.

7



Zero.dPG.

Appendix F

BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Appendix F

Geophysical Investigation Documentation

BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Draft for EPA Review

Geophysical Investigation Figures

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

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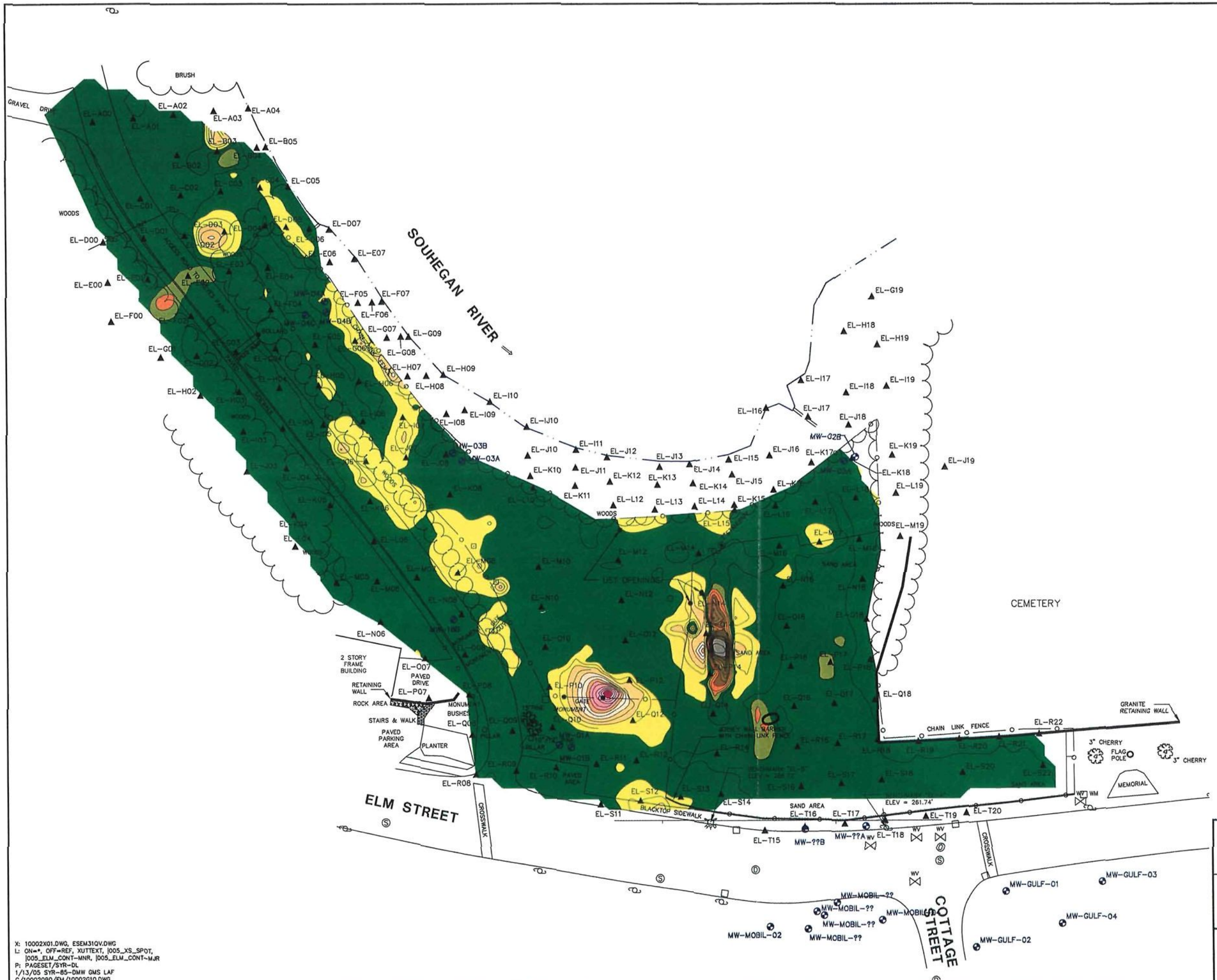
F-6 Mill Street Area – EM-61 Differential Response
F-7 Mill Street Area – EM-61 CH3 Response
F-8 Elm Street Area – EM-61 Differential Response



LEGEND

- UTILITY POLE
- CATCH BASIN
- SANITARY MANHOLE
- STORM MANHOLE
- WATER VALVE
- WATER METER
- TELEPHONE JACK
- EDGE OF TREES
- CHAIN LINK FENCE
- FIRE HYDRANT
- MW-18B MONITORING WELL
- EL-010 SOIL BORING

RESPONSE (MV):

180
140
110
90
80
60
40
20
0
−10
−30
−40
−70
−90
−110

NOTES:

1) ELEVATIONS BASED ON NORTH AMERICAN VERTICAL DATUM OF 1988.

2) HORIZONTAL DATUM BASED ON NEW HAMPSHIRE STATE PLANE COORDINATE SYSTEM OF 1983.

3) CONTOUR INTERVAL = 1 FEET.

4) LOCATION OF UNDERGROUND UTILITIES AND OTHER UNDERGROUND STRUCTURES OBTAINED BY FIELD MEASRUREMENTS WHERE POSSIBLE, OTHERWISE OBTAINED FROM OTHER SOURCES AND MAY BE APPROXIMATE ONLY. OTHER UNDERGROUND UTILITIES AND STRUCTURES MAY EXIST, THE LOCATION OF WHICH ARE PRESENTLY UNKNOWN.

5) MAP COMPILED FROM ACTUAL FIELD SURVEY PERFORMED BY BBL, INC. FROM JULY 16, 2003 THROUGH AUGUST 14, 2003.

0 30' 60'
GRAPHIC SCALE

DRAFT
FOR EPA REVIEW

GENERAL ELECTRIC COMPANY
FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE – MILFORD, NEW HAMPSHIRE
PRE-DESIGN REPORT

ELM STREET AREA - EM-31 APPARENT CONDUCTIVITY

BBL®
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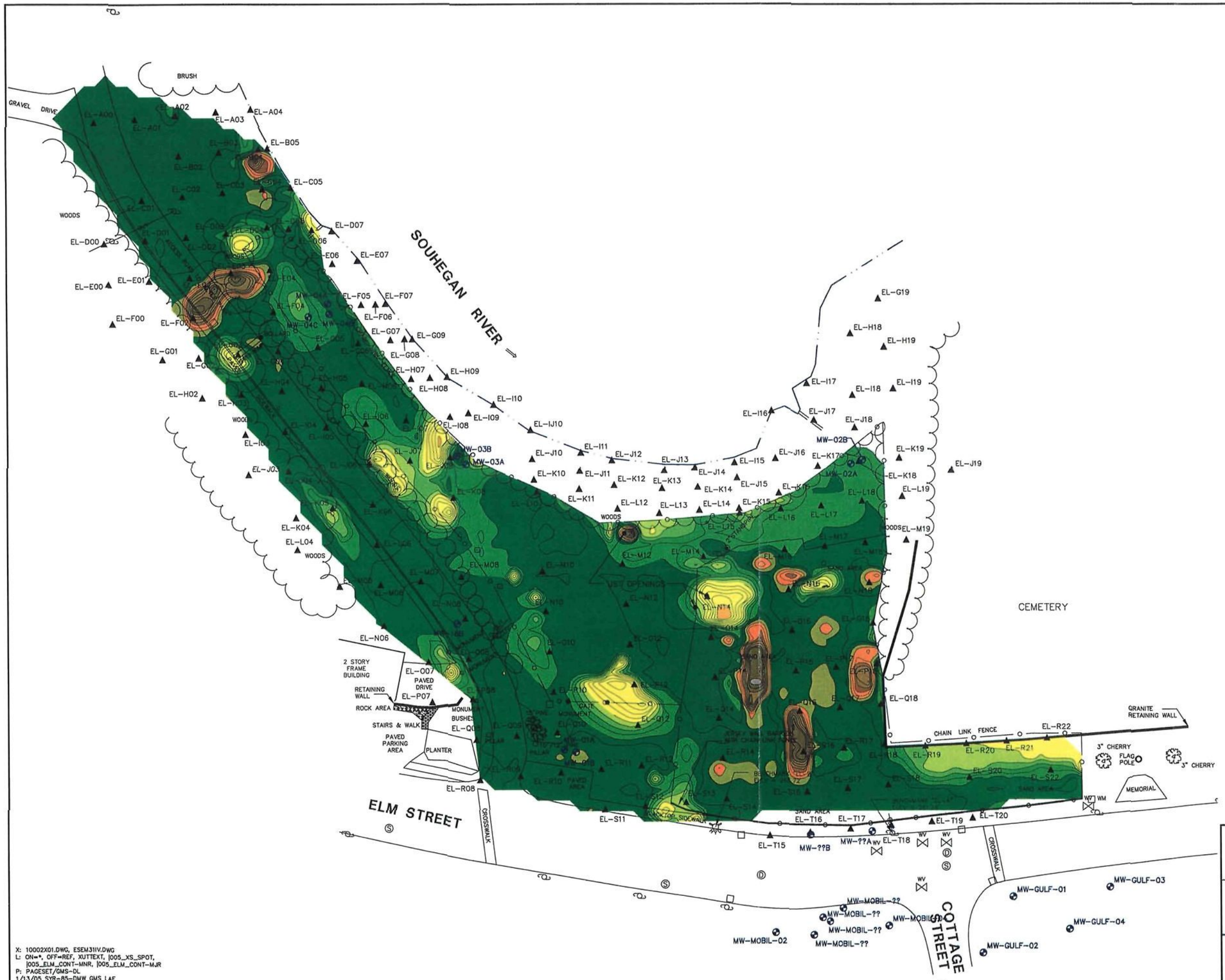
engineers, scientists, economists

FIGURE
F-1

X: 10002X01.DWG, ESEM31QV.DWG
L: ON=*, OFF=REF, XUTTEXT, |005_XS_SPOT, |005_ELM_CONT-MNR, |005_ELM_CONT-MJR
P: PAGESET/SYR-DL
1/13/05 SYR-85-DMW GMS LAF
C/10002090/EM/10002G10.DWG



LEGEND

- UTILITY POLE
- CATCH BASIN
- SANITARY MANHOLE
- STORM MANHOLE
- WATER VALVE
- WATER METER
- TELEPHONE JACK
- EDGE OF TREES
- CHAIN LINK FENCE
- FIRE HYDRANT
- MW-18B MONITORING WELL
- EL-010 SOIL BORING

RESPONSE (MV):

24, 22, 20, 10, 8, 6, 2, −2, −4, −8, −10, −16, −20, −22

NOTES:

1) ELEVATIONS BASED ON NORTH AMERICAN VERTICAL DATUM OF 1988.

2) HORIZONTAL DATUM BASED ON NEW HAMPSHIRE STATE PLANE COORDINATE SYSTEM OF 1983.

3) CONTOUR INTERVAL = 1 FEET.

4) LOCATION OF UNDERGROUND UTILITIES AND OTHER UNDERGROUND STRUCTURES OBTAINED BY FIELD MEASRUREMENTS WHERE POSSIBLE, OTHERWISE OBTAINED FROM OTHER SOURCES AND MAY BE APPROXIMATE ONLY. OTHER UNDERGROUND UTILITIES AND STRUCTURES MAY EXIST, THE LOCATION OF WHICH ARE PRESENTLY UNKNOWN.

5) MAP COMPILED FROM ACTUAL FIELD SURVEY PERFORMED BY BBL, INC. FROM JULY 16, 2003 THROUGH AUGUST 14, 2003.

0 30' 60'
GRAPHIC SCALE

DRAFT
FOR EPA REVIEW

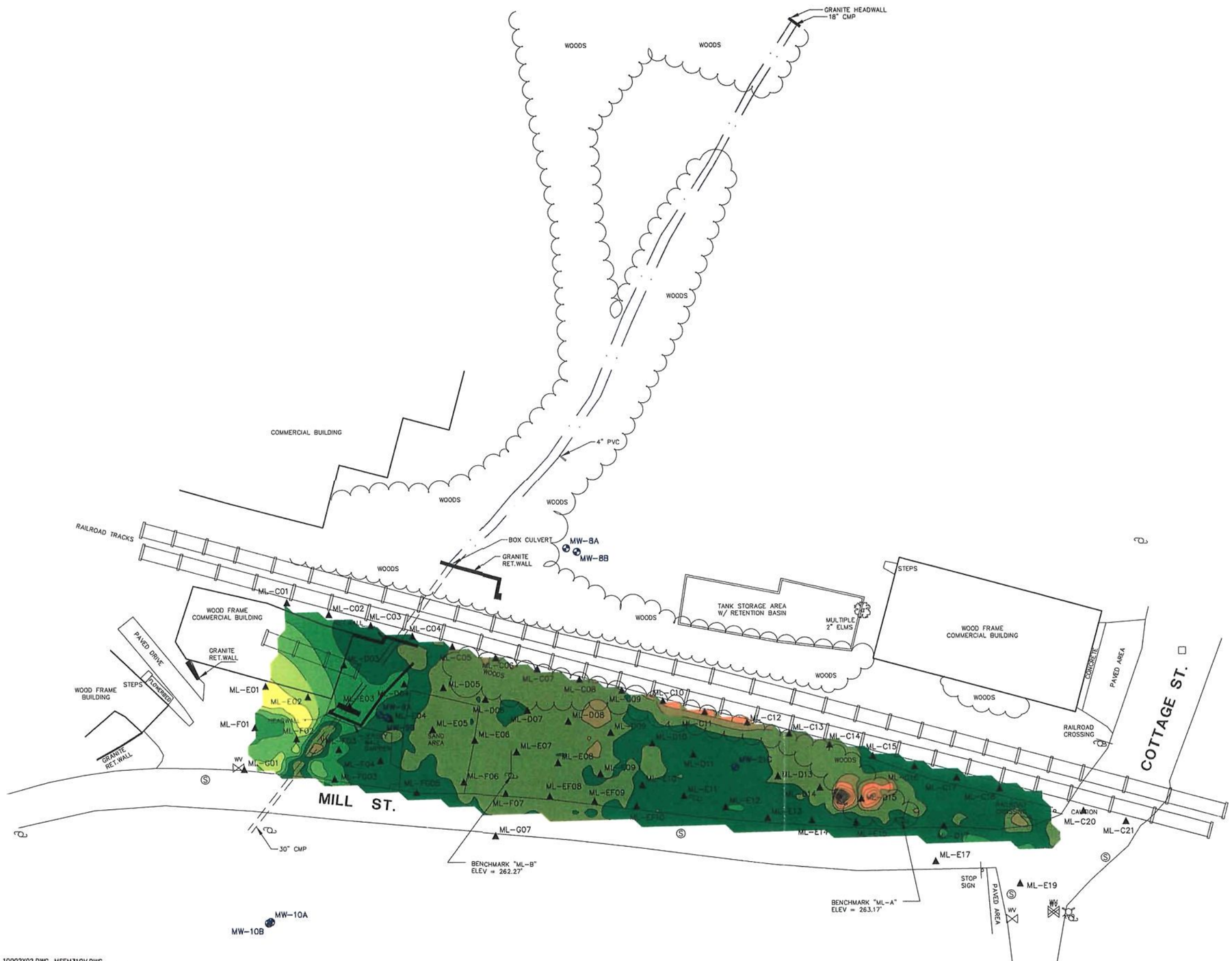
GENERAL ELECTRIC COMPANY
FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE – MILFORD, NEW HAMPSHIRE
PRE-DESIGN REPORT

ELM STREET AREA - EM-31 IN-PHASE RESPONSE

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
F-2

X: 10002X01.DWG, ESEM31IV.DWG
L: ON=*, OFF=REF, XUTTEXT, |005_XS_SPOT, |005_ELM_CONT-MNR, |005_ELM_CONT-MJR
P: PAGESET/GMS-DL
1/13/05 SYR-85-DMW GMS LAF
C/10002090/EM/10002G05.DWG



LEGEND

- UTILITY POLE
- CATCH BASIN
- SANITARY MANHOLE
- WV — WATER VALVE
- 260 — SURFACE ELEVATION CONTOUR
- EDGE OF TREES
- CHAIN LINK FENCE
- FIRE HYDRANT
- MW-9B — MONITORING WELL
- ML-F06 — SOIL BORING

RESPONSE (MV):

40, 25, 20, 15, 10, 5, 0, −5, −20, −25, −45, −50

NOTES:

1) ELEVATIONS BASED ON NORTH AMERICAN VERTICAL DATUM OF 1988.

2) HORIZONTAL DATUM BASED ON NEW HAMPSHIRE STATE PLANE COORDINATE SYSTEM OF 1983.

3) CONTOUR INTERVAL = 1 FEET.

4) LOCATION OF UNDERGROUND UTILITIES AND OTHER UNDERGROUND STRUCTURES OBTAINED BY FIELD MEASRUREMENTS WHERE POSSIBLE, OTHERWISE OBTAINED FROM OTHER SOURCES AND MAY BE APPROXIMATE ONLY. OTHER UNDERGROUND UTILITIES AND STRUCTURES MAY EXIST, THE LOCATION OF WHICH ARE PRESENTLY UNKNOWN.

5) MAP COMPILED FROM ACTUAL FIELD SURVEY PERFORMED BY BBL, INC. FROM JULY 16, 2003 THROUGH AUGUST 14, 2003.

0 30' 60'
GRAPHIC SCALE

DRAFT
FOR EPA REVIEW

GENERAL ELECTRIC COMPANY
FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE – MILFORD, NEW HAMPSHIRE
PRE-DESIGN REPORT

MILL STREET AREA - EM-31 APPARENT CONDUCTIVITY

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
F-3

X: 10002X02.DWG, MSEM31QV.DWG
L: ON=*, OFF=REF, XUTTEXT, |005_XS_SPOT, |005_MILL-0_CONT-MNR, |005_MILL-0_CONT-MJR,
P: PAGESET/SYR-DL
1/13/05 SYR-BS-DMW GMS LAF
C/10002090/EM/10002G08.DWG

LEGEND

- UTILITY POLE
- CATCH BASIN
- SANITARY MANHOLE
- WATER VALVE
- 260 — SURFACE ELEVATION CONTOUR
- EDGE OF TREES
- CHAIN LINK FENCE
- FIRE HYDRANT
- MW-9B — MONITORING WELL
- ML-F06 — SOIL BORING

RESPONSE (MV):

22
18
12
4
2
0
-2
-4
-6
-8
-14
-18
-20
-22

NOTES:

1) ELEVATIONS BASED ON NORTH AMERICAN VERTICAL DATUM OF 1988.

2) HORIZONTAL DATUM BASED ON NEW HAMPSHIRE STATE PLANE COORDINATE SYSTEM OF 1983.

3) CONTOUR INTERVAL = 1 FEET.

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0 30' 60'
GRAPHIC SCALE

DRAFT
FOR EPA REVIEW

GENERAL ELECTRIC COMPANY
FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE – MILFORD, NEW HAMPSHIRE
PRE-DESIGN REPORT

MILL STREET AREA EM-31 IN-PHASE RESPONSE

BBL®
BLASLAND, BOUCK & LEE, INC.
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FIGURE
F-4

X: 10002X02.DWG, MSEM31IV.DWG
L: ON=*, OFF=REF, XUTTEXT, |005_XS_SPOT, |005_MILL-0_CONT-MNR, |005_MILL-0_CONT-MJR
P: PAGESET/SYR-DL
1/13/05 SYR-85-DMW GMS LAF
C/10002090/EM/10002G07.DWG

LEGEND

- UTILITY POLE
- CATCH BASIN
- SANITARY MANHOLE
- STORM MANHOLE
- WV WATER VALVE
- WM WATER METER
- TELEPHONE JACK
- EDGE OF TREES
- CHAIN LINK FENCE
- FIRE HYDRANT
- MW-18B MONITORING WELL
- EL-010 SOIL BORING

RESPONSE (MV):

3800
2400
1000
800
600
400
200
0

NOTES:

1) ELEVATIONS BASED ON NORTH AMERICAN VERTICAL DATUM OF 1988.

2) HORIZONTAL DATUM BASED ON NEW HAMPSHIRE STATE PLANE COORDINATE SYSTEM OF 1983.

3) CONTOUR INTERVAL = 1 FEET.

4) LOCATION OF UNDERGROUND UTILITIES AND OTHER UNDERGROUND STRUCTURES OBTAINED BY FIELD MEASRUREMENTS WHERE POSSIBLE, OTHERWISE OBTAINED FROM OTHER SOURCES AND MAY BE APPROXIMATE ONLY. OTHER UNDERGROUND UTILITIES AND STRUCTURES MAY EXIST, THE LOCATION OF WHICH ARE PRESENTLY UNKNOWN.

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0 30' 60'
GRAPHIC SCALE

DRAFT
FOR EPA REVIEW

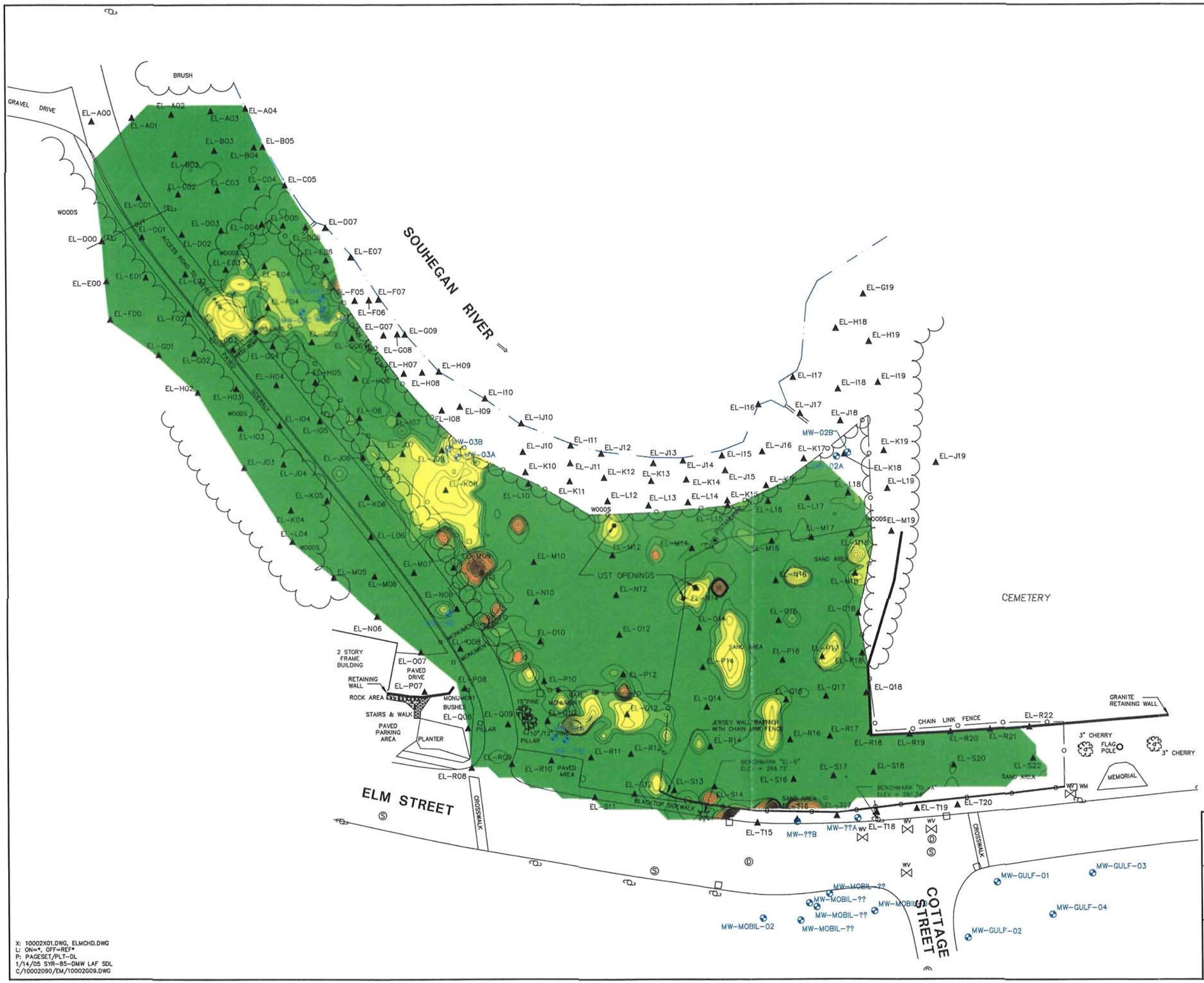
GENERAL ELECTRIC COMPANY
FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE – MILFORD, NEW HAMPSHIRE
PRE-DESIGN REPORT

ELM STREET AREA - EM-61 CH3 RESPONSE

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

FIGURE
F-5

X: 10002X01.DWG, ELMCH3.DWG
L: ON=*, OFF=REF*
P: PAGESET/PLT-DL
1/13/05 SYR-85-DMW LJP LAF
C/10002090/EM/10002G03.DWG



LEGEND

- UTILITY POLE
- CATCH BASIN
- SANITARY MANHOLE
- STORM MANHOLE
- WATER VALVE
- WATER METER
- TELEPHONE JACK
- EDGE OF TREES
- CHAIN LINK FENCE
- FIRE HYDRANT
- MW-18B MONITORING WELL
- EL-010 SOIL BORING

RESPONSE (MV):

1200
200
100
-50
-100
-500
-900
-1200

NOTES:

1) ELEVATIONS BASED ON NORTH AMERICAN VERTICAL DATUM OF 1988.

2) HORIZONTAL DATUM BASED ON NEW HAMPSHIRE STATE PLANE COORDINATE SYSTEM OF 1983.

3) CONTOUR INTERVAL = 1 FEET.

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5) MAP COMPILED FROM ACTUAL FIELD SURVEY PERFORMED BY BBL, INC. FROM JULY 16, 2003 THROUGH AUGUST 14, 2003.

0 30' 60'
GRAPHIC SCALE

DRAFT
FOR EPA REVIEW

GENERAL ELECTRIC COMPANY
FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE - MILFORD, NEW HAMPSHIRE
PRE-DESIGN REPORT

ELM STREET AREA - EM-61 DIFFERENTIAL RESPONSE

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engineers, scientists, economists

FIGURE
F-6

X: 10002X01.DWG, ELMCHD.DWG
L: ON=*, OFF=REF*
P: PAGESET/PLT-DL
1/14/05 SYR-85-DMW LAF SDL
C/10002090/EM/10002G09.DWG

LEGEND

- UTILITY POLE
- CATCH BASIN
- SANITARY MANHOLE
- WATER VALVE
- 260 — SURFACE ELEVATION CONTOUR
- EDGE OF TREES
- CHAIN LINK FENCE
- FIRE HYDRANT
- MW-9B — MONITORING WELL
- ML-F06 — SOIL BORING

RESPONSE (MV):

- 5800
- 4800
- 2600
- 400
- 200
- 0

NOTES:

1) ELEVATIONS BASED ON NORTH AMERICAN VERTICAL DATUM OF 1988.

2) HORIZONTAL DATUM BASED ON NEW HAMPSHIRE STATE PLANE COORDINATE SYSTEM OF 1983.

3) CONTOUR INTERVAL = 1 FEET.

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0 30' 60'
GRAPHIC SCALE

DRAFT
FOR EPA REVIEW

GENERAL ELECTRIC COMPANY
FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE – MILFORD, NEW HAMPSHIRE
PRE-DESIGN REPORT

MILL STREET AREA - EM-61 CH3 RESPONSE

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engineers, scientists, economists

FIGURE
F-7

X: 10002X02.DWG, MILLCH3.DWG
L: ON=*, OFF=REF*
P: PAGESET/PLT-DL
1/13/05 SYR-BS-DMW LJP LAF
C/10002090/EM/10002G06.DWG

LEGEND

- UTILITY POLE
- CATCH BASIN
- SANITARY MANHOLE
- WATER VALVE
- 260 SURFACE ELEVATION CONTOUR
- EDGE OF TREES
- CHAIN LINK FENCE
- FIRE HYDRANT
- MW-9B MONITORING WELL
- ML-F06 SOIL BORING

RESPONSE (MV):

850
500
350
200
150
100
50
0
-100
-150
-450
-1000

NOTES:

1) ELEVATIONS BASED ON NORTH AMERICAN VERTICAL DATUM OF 1988.

2) HORIZONTAL DATUM BASED ON NEW HAMPSHIRE STATE PLANE COORDINATE SYSTEM OF 1983.

3) CONTOUR INTERVAL = 1 FEET.

4) LOCATION OF UNDERGROUND UTILITIES AND OTHER UNDERGROUND STRUCTURES OBTAINED BY FIELD MEASRUREMENTS WHERE POSSIBLE, OTHERWISE OBTAINED FROM OTHER SOURCES AND MAY BE APPROXIMATE ONLY. OTHER UNDERGROUND UTILITIES AND STRUCTURES MAY EXIST, THE LOCATION OF WHICH ARE PRESENTLY UNKNOWN.

5) MAP COMPILED FROM ACTUAL FIELD SURVEY PERFORMED BY BBL, INC. FROM JULY 16, 2003 THROUGH AUGUST 14, 2003.

0 30' 60'
GRAPHIC SCALE

DRAFT
FOR EPA REVIEW

GENERAL ELECTRIC COMPANY
FLETCHER'S PAINT WORKS AND STORAGE FACILITY
SUPERFUND SITE - MILFORD, NEW HAMPSHIRE
PRE-DESIGN REPORT

MILL STREET AREA - EM-61 DIFFERENTIAL RESPONSE

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engineers, scientists, economists

FIGURE
F-8

X: 10002X02.DWG, MILLCHD.DWG
L: ON=*, OFF=REF*
P: PAGESET/PLT-DL
1/14/05 SYR-85-DMW LAF SDL
C/10002090/EM/10002G04.DWG

Draft for EPA Review

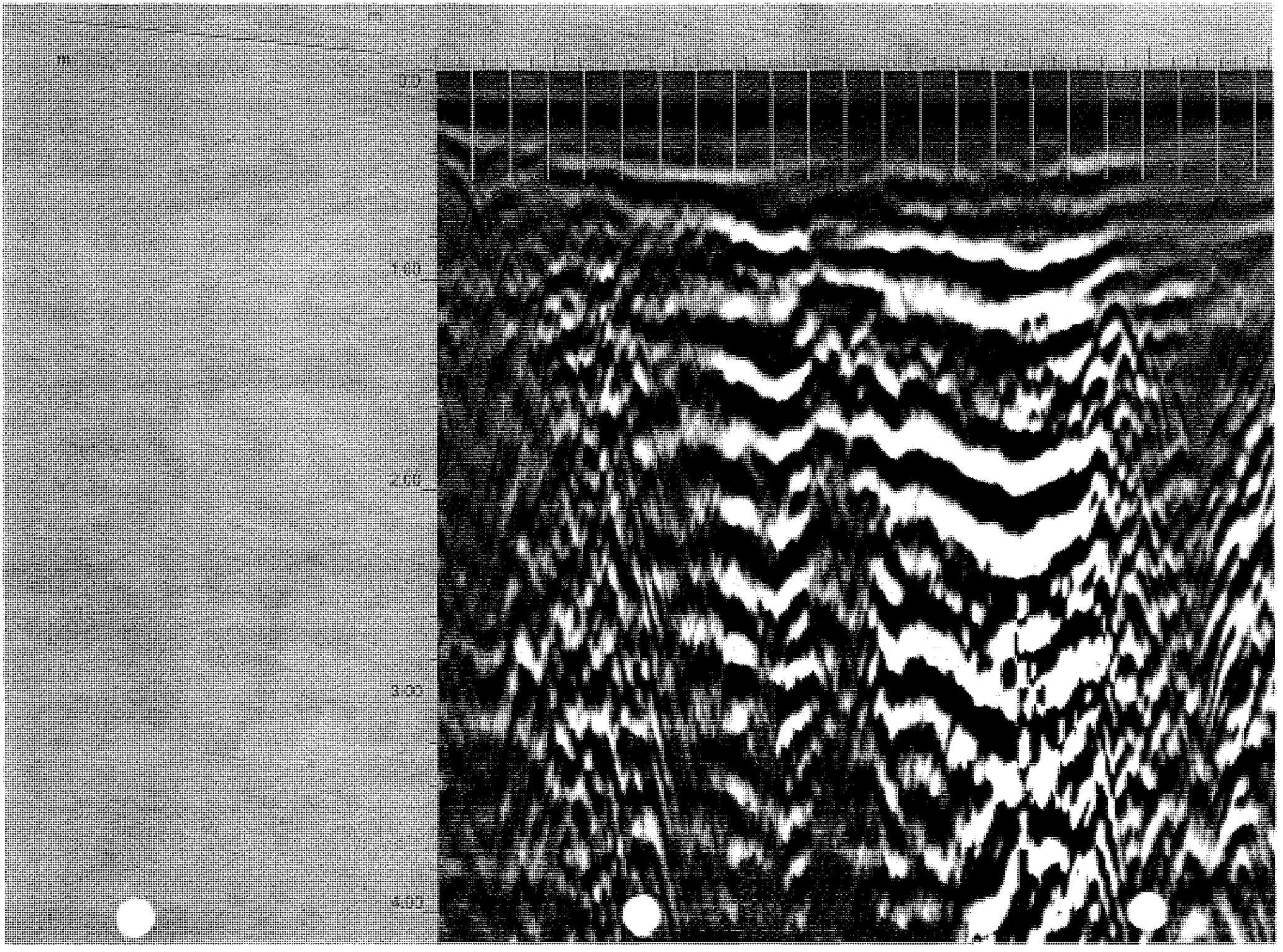
Geophysical Investigation Data

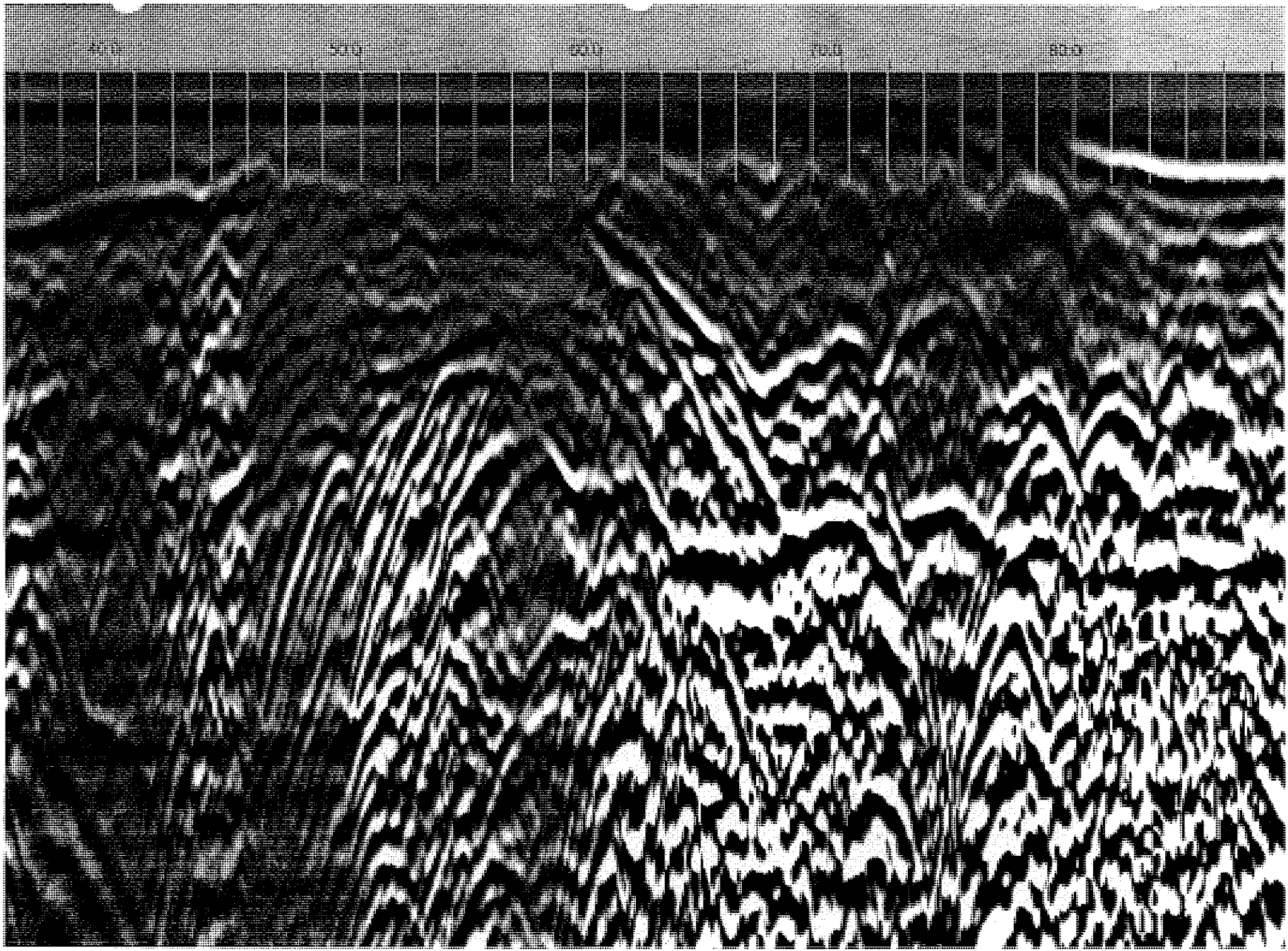
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

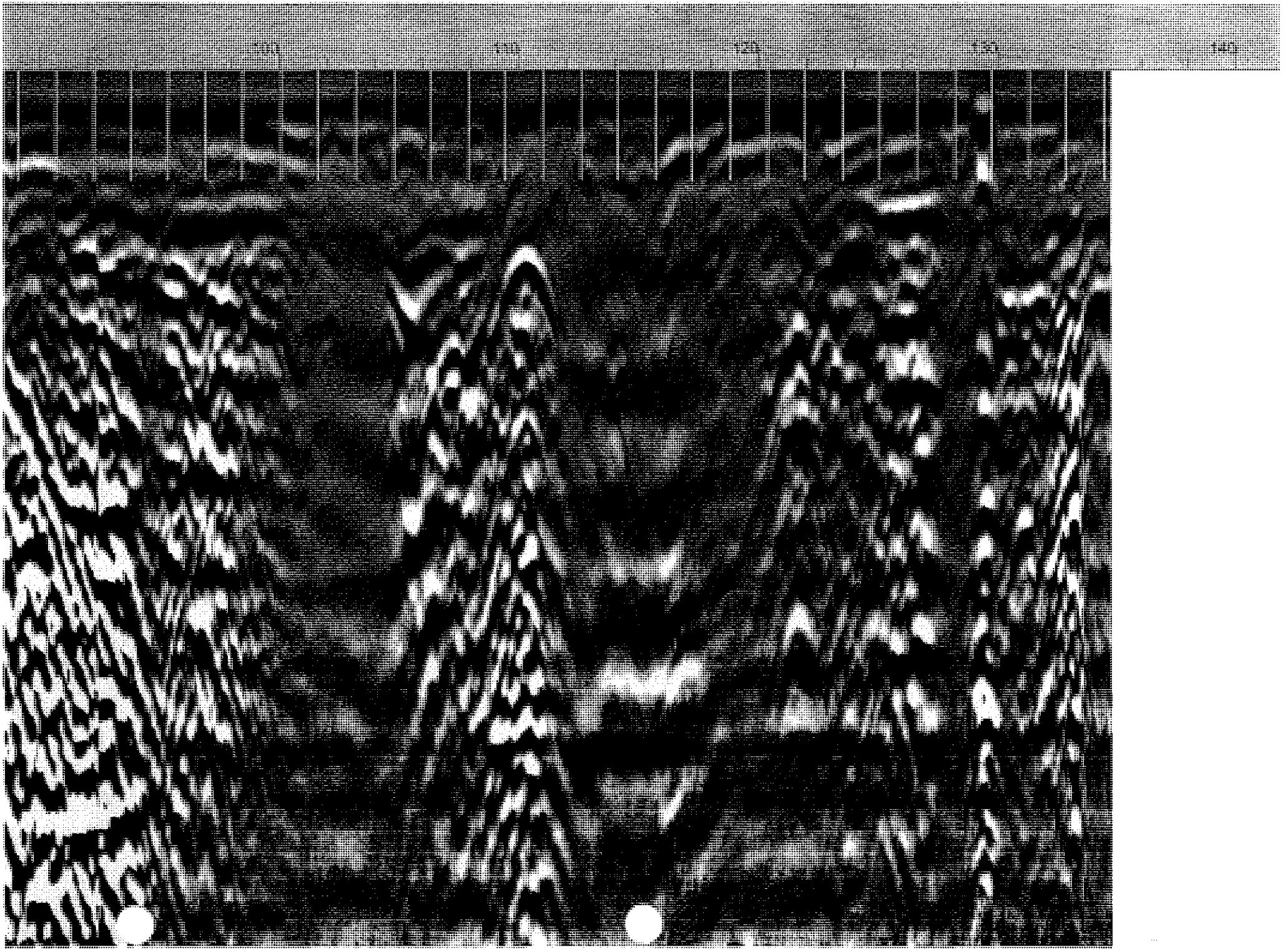
GE - Fletcher Paint
Mill Street Site
Test Profile along North side of Mill Street - from Grid Location E15 to G01.

Created Aug, 14 2003, 11:25:02 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) -1.0 39.0 71.0
76.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3


m
m
0.0
1.00
2.00
3.00
4.00



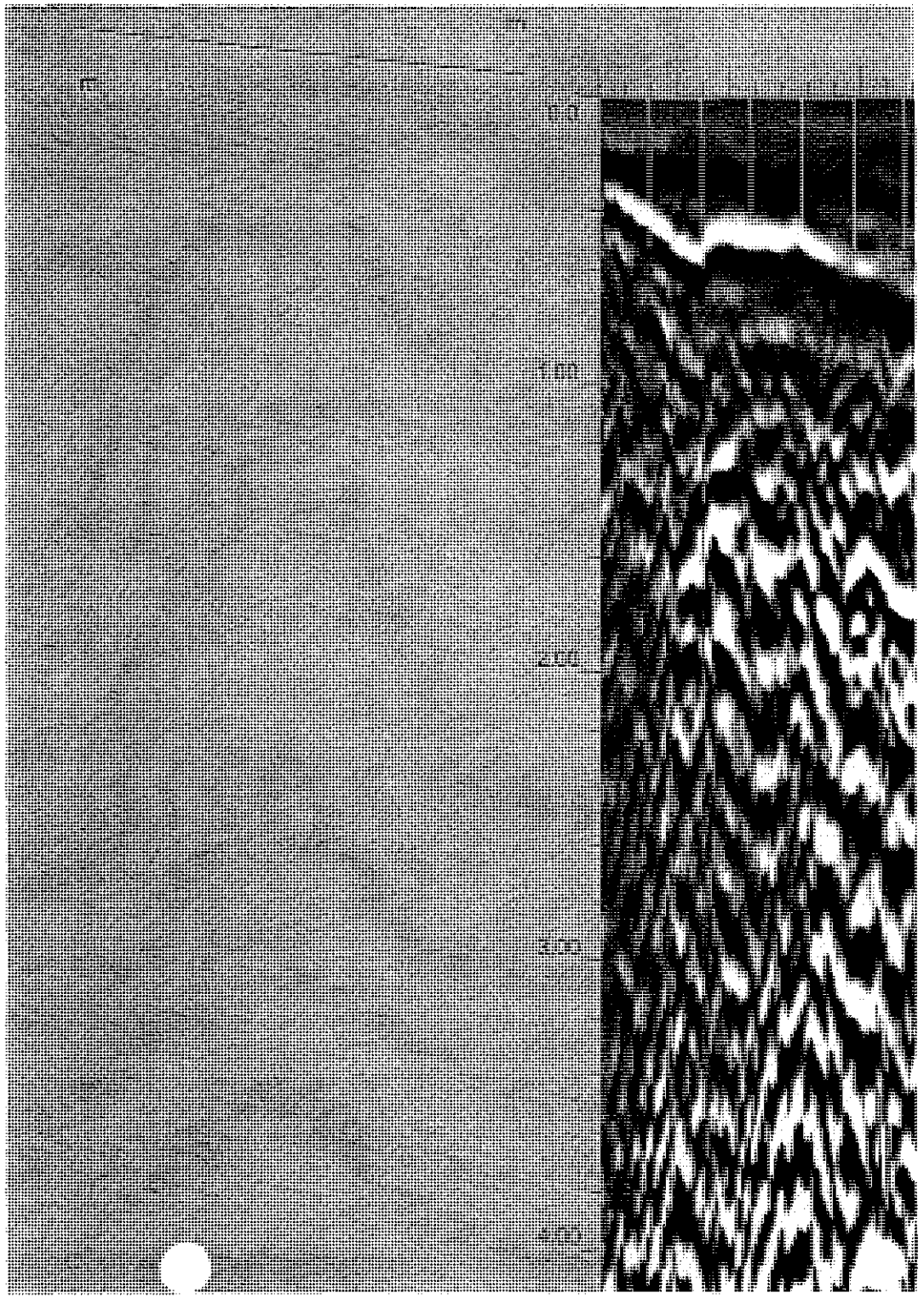


FIL .DZT

GE - Fletcher Paint
Mill Street Site
From Grid Location D15 to D13.

Created Aug, 14 2003, 11:17:20 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) 5.0 34.0 51.0
77.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3

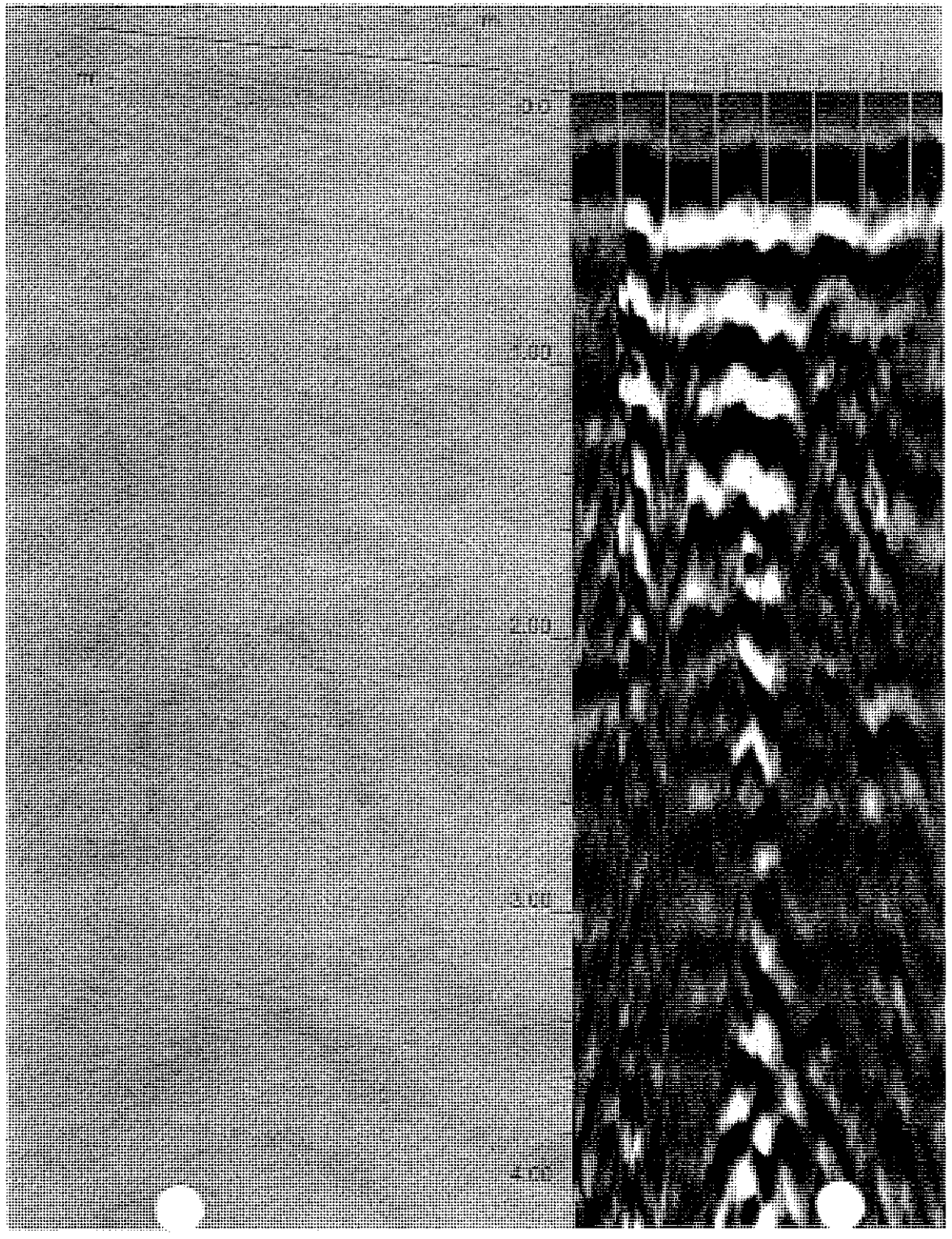

0.0
1.00
2.00
3.00
4.00

FIL .DZT

GE - Fletcher Paint
Mill Street Site
From Grid Location D07 to D05 + 5 ft west.
Subsurface metal debris and possible RR ties.

Created Aug, 14 2003, 11:10:34 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) 12.0 42.0 46.0
67.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3

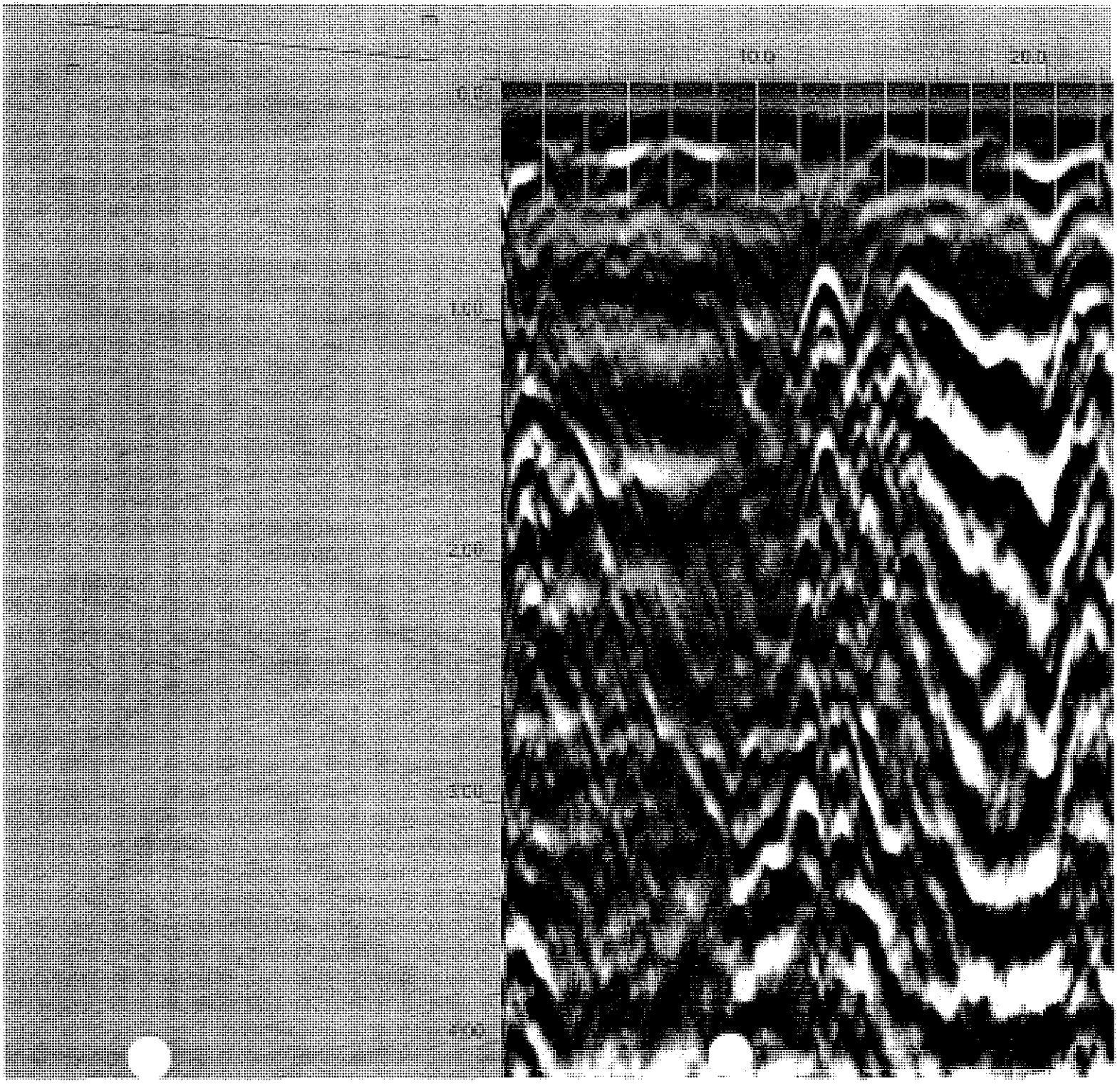

m
m
3.2
3.00
2.80
2.60
2.40

Fli .DZT

GE - Fletcher Paint
Mill Street Site
From Grid Location F04 to F02 + 15 ft west.
Possible pipe at 36 Feet and fill debris.

Created Aug, 14 2003, 10:59:02 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) 1.0 39.0 63.0
77.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3

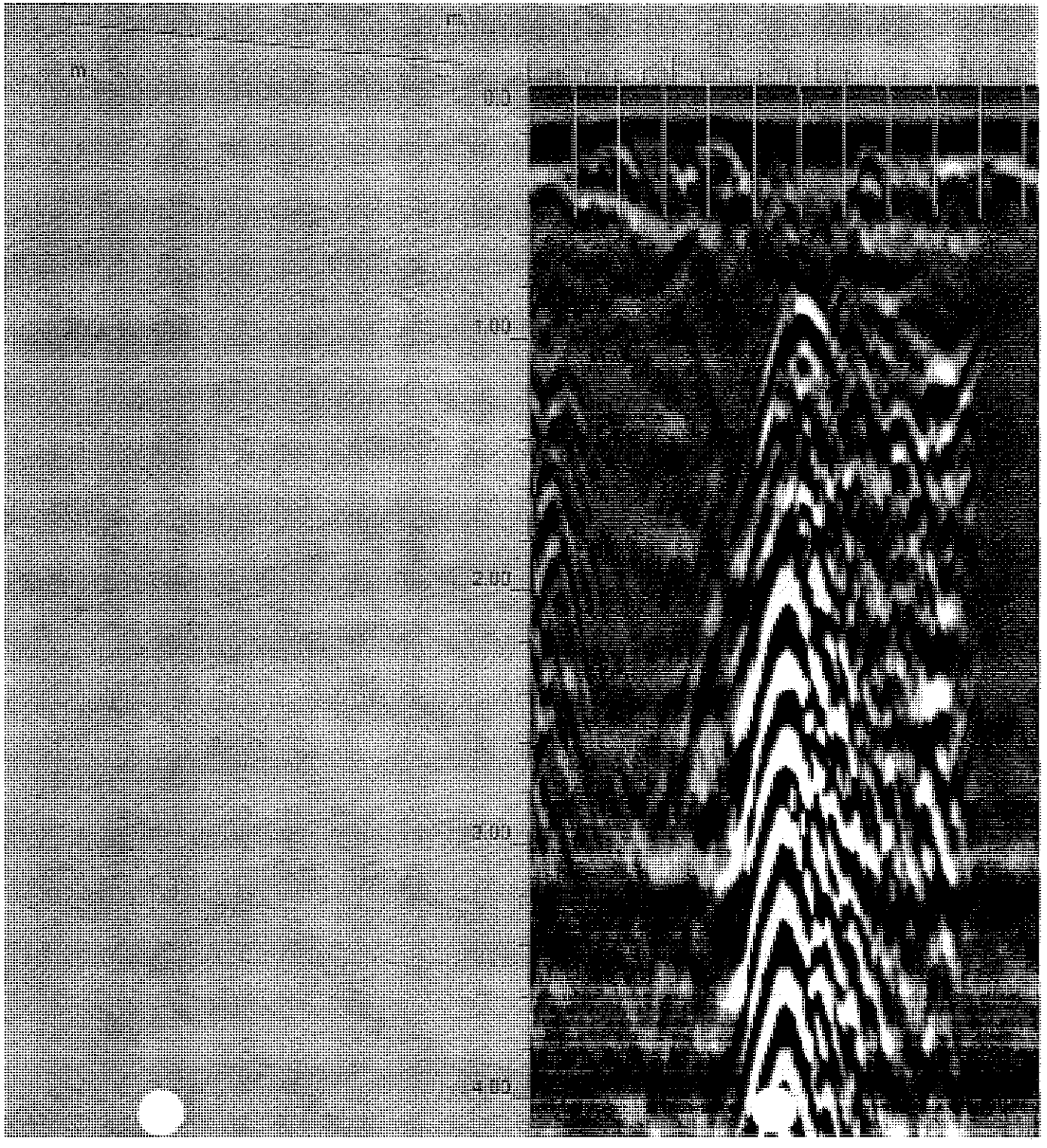

10.0
20.0
0.0
1.0
2.0
3.0
4.0

FIL DZT

GE - Fletcher Paint
Mill Street Site
From Grid Location FG03 to G01 + 5 ft west.
Over Culvert pipe.

Created Aug, 14 2003, 10:55:32 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) 5.0 32.0 72.0
80.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3

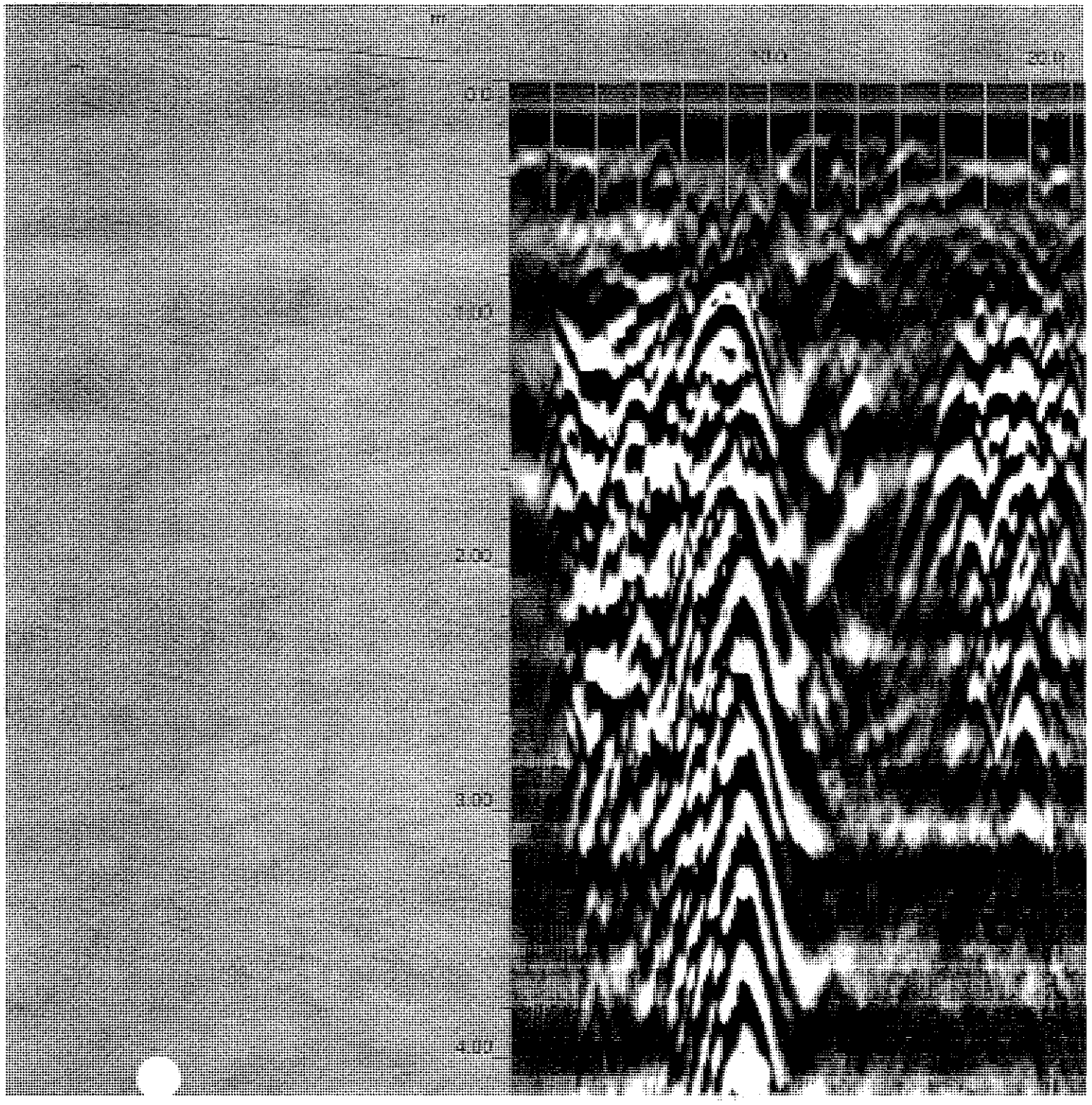

0.0
1.00
2.00
3.00
4.00

FIL DZT

GE - Fletcher Paint
Mill Street Site
From Grid Location FG03 to G01 + 5 ft west.
Over Culvert pipe.

Created Aug, 14 2003, 10:53:34 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) 6.0 53.0 76.0
78.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3

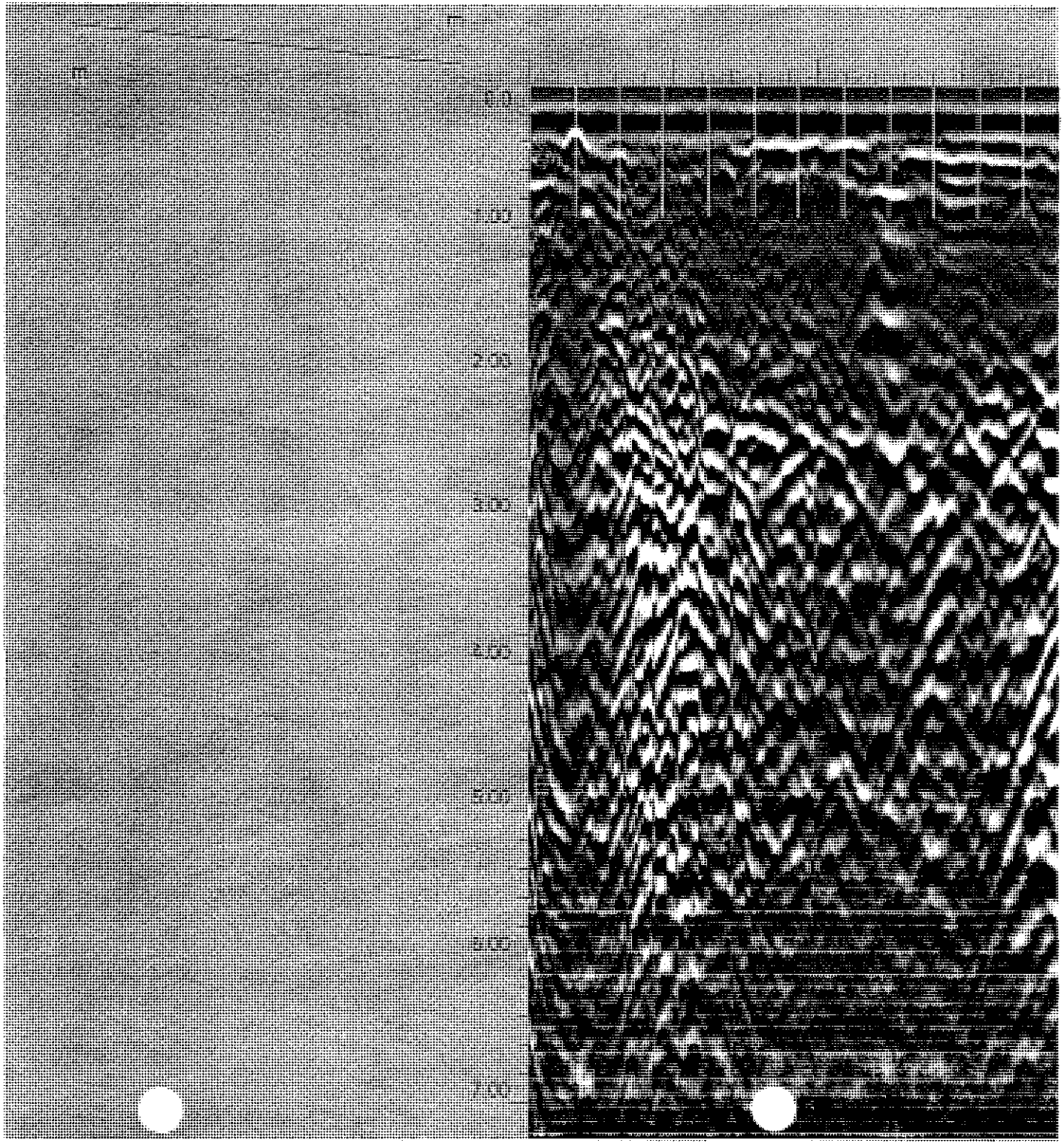

m
0.0
1.00
2.00
3.00
4.00

FIL .DZT

GE - Fletcher Paint
Elm Street Site
From Grid Location R16 to 20 ft west of R14.
Possible water line observed at 40 ft (10 ft east of R14), and possible storm drain located 14ft west of R16.

Created Aug, 14 2003, 10:25:22 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 140 nS
Range Gain (dB) 2.0 45.0 70.0
74.0
Vert IIR LP N =1 F =860 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3

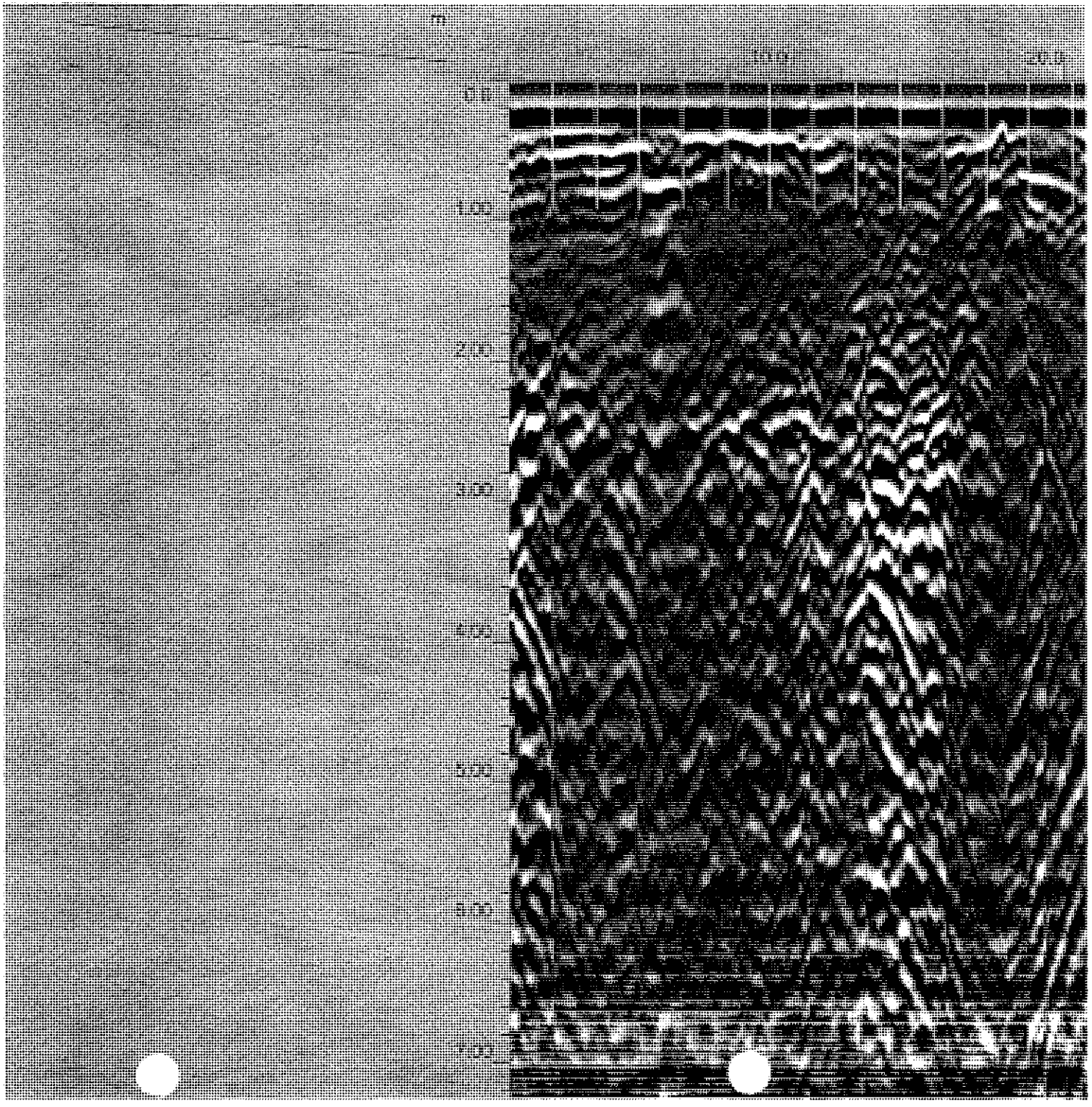

0.0
0.5
1.0
1.5
2.0
2.5
3.0
3.5
4.0
4.5
5.0
5.5
6.0

FIL DZT

GE - Fletcher Paint
Elm Street Site
From 25 ft west of Grid Location R14 (at fence) to R16.

Created Aug, 14 2003, 10:22:44 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 140 nS
Range Gain (dB) -2.0 34.0 58.0
76.0
Vert IIR LP N =1 F =860 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3

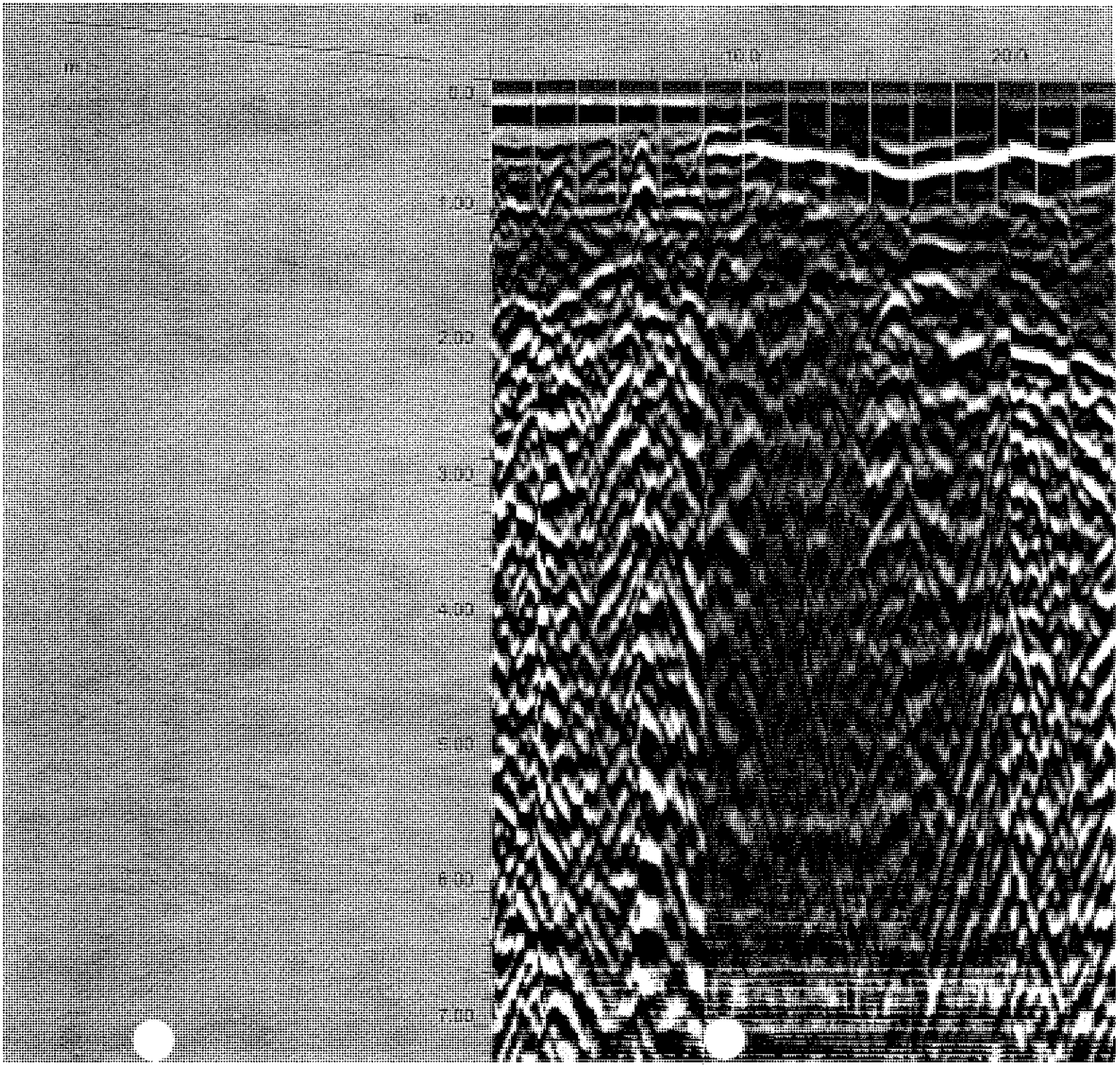


FIL DZT

GE - Fletcher Paint
Elm Street Site
From Grid Location P16 to P12.

Created Aug, 14 2003, 10:15:36 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

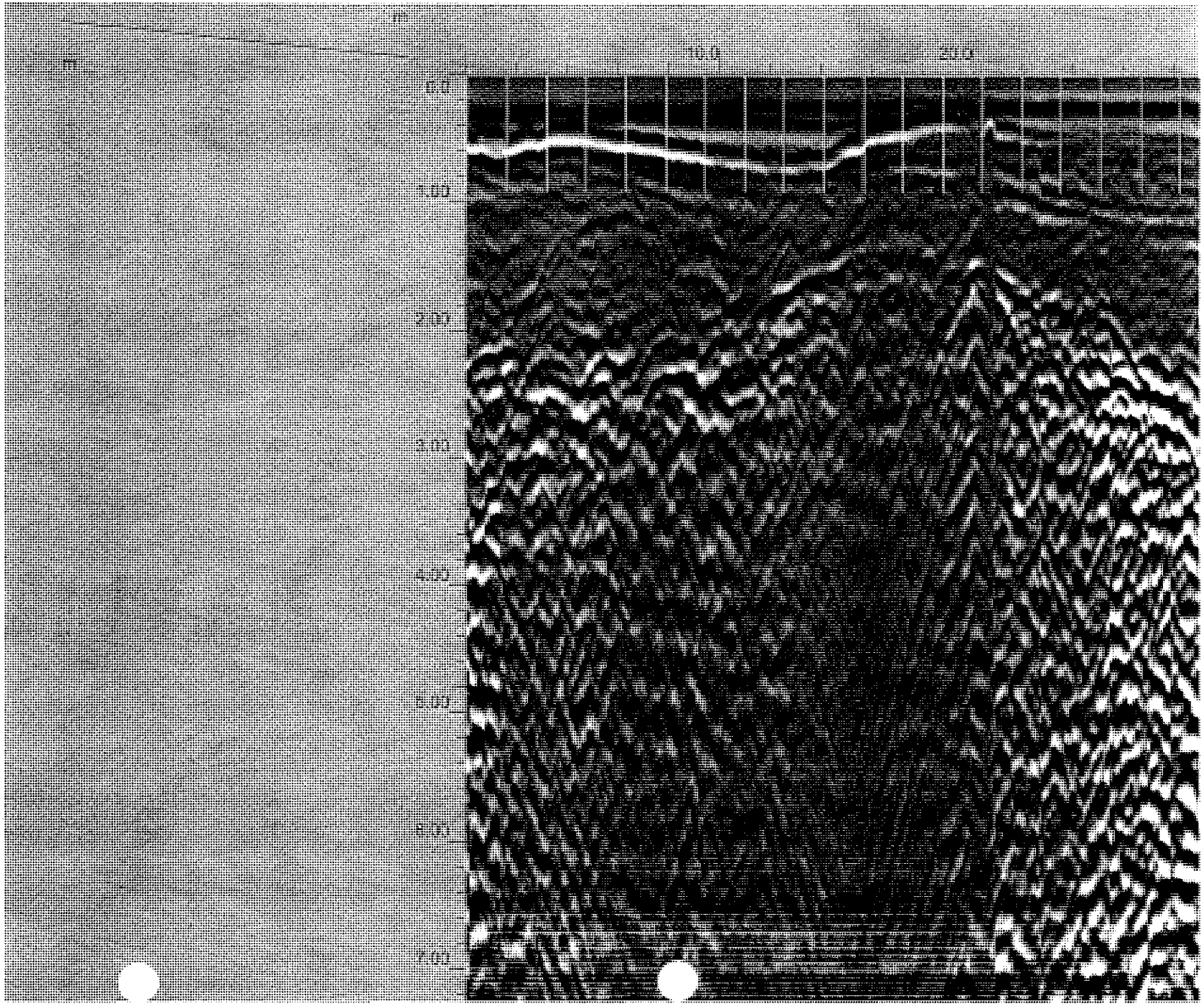
CHANNEL 1 200D
Position 0 nS Range 140 nS
Range Gain (dB) -2.0 34.0 58.0
76.0
Vert IIR LP N =1 F =860 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3


E
W
10.0
20.0
0.0
1.00
2.00
3.00
4.00
5.00
6.00
7.00

GE - Fletcher Paint
Elm Street Site
From 10 ft south of Grid Location O12 to 10 ft south of O16.

Created Aug, 14 2003, 10:05:22 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

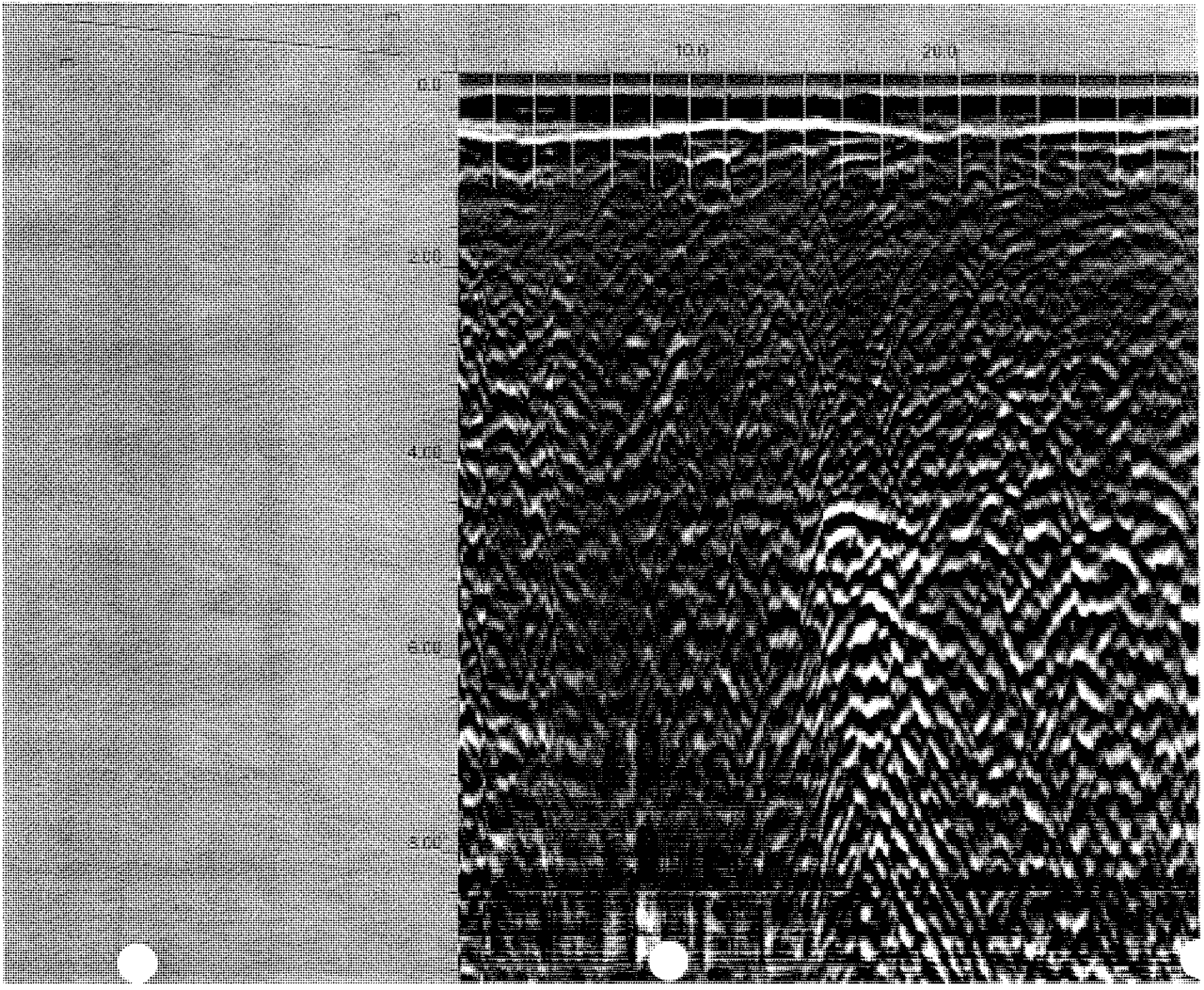
CHANNEL 1 200D
Position 0 nS Range 140 nS
Range Gain (dB) -2.0 34.0 58.0
76.0
Vert IIR LP N =1 F =860 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3


m
m
10.0
20.0
0.0
1.00
2.00
3.00
4.00
5.00
6.00
7.00

GE - Fletcher Paint
Elm Street Site
From Grid Location M10 to M14.

Created Aug, 14 2003, 09:37:38 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 180 nS
Range Gain (dB) 7.0 38.0 63.0
80.0
Vert IIR LP N =1 F =495 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =3

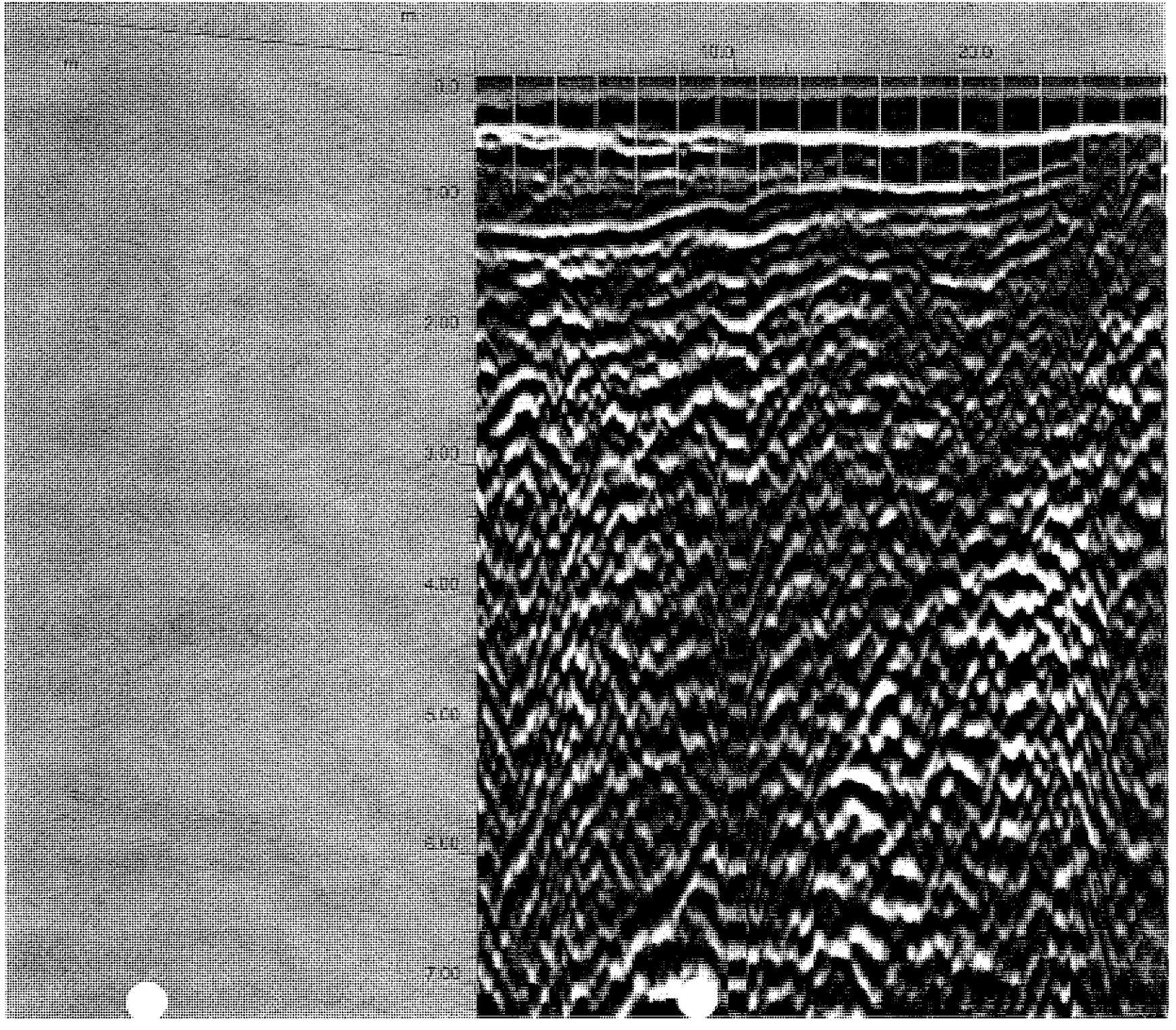

0.0
2.0
4.0
6.0
8.0
10.0
20.0

FII DZT

GE - Fletcher Paint
Elm Street Site
From Grid Location L18 to M14 - Culvert pipe 5 ft west of L18.

Created Aug, 14 2003, 09:46:36 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 140 nS
Range Gain (dB) 6.0 40.0 58.0
69.0
Vert IIR LP N =1 F =860 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3

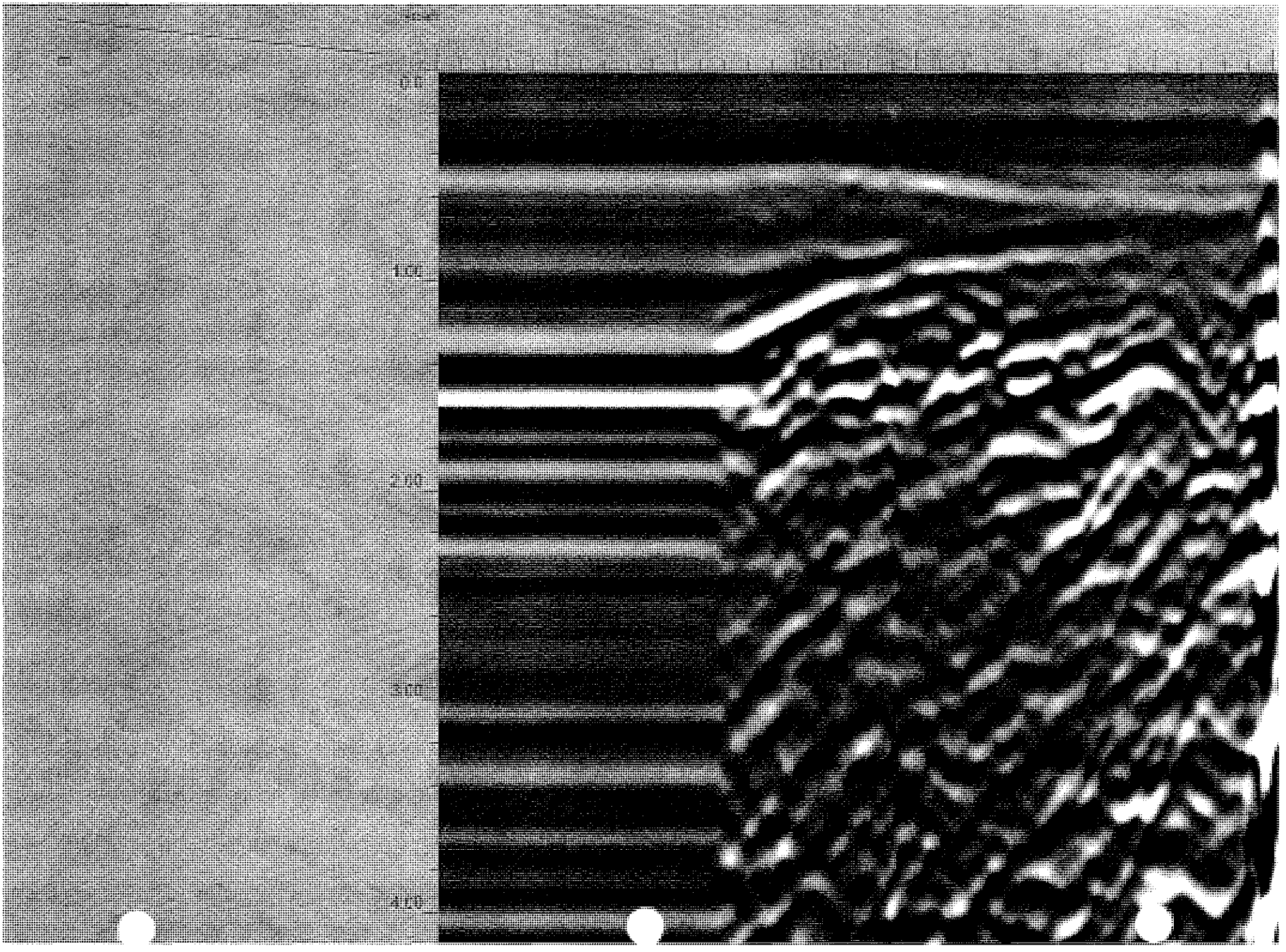

ft
1.00
1.50
2.00
2.50
3.00
3.50
4.00
4.50
5.00
5.50
6.00
6.50
7.00

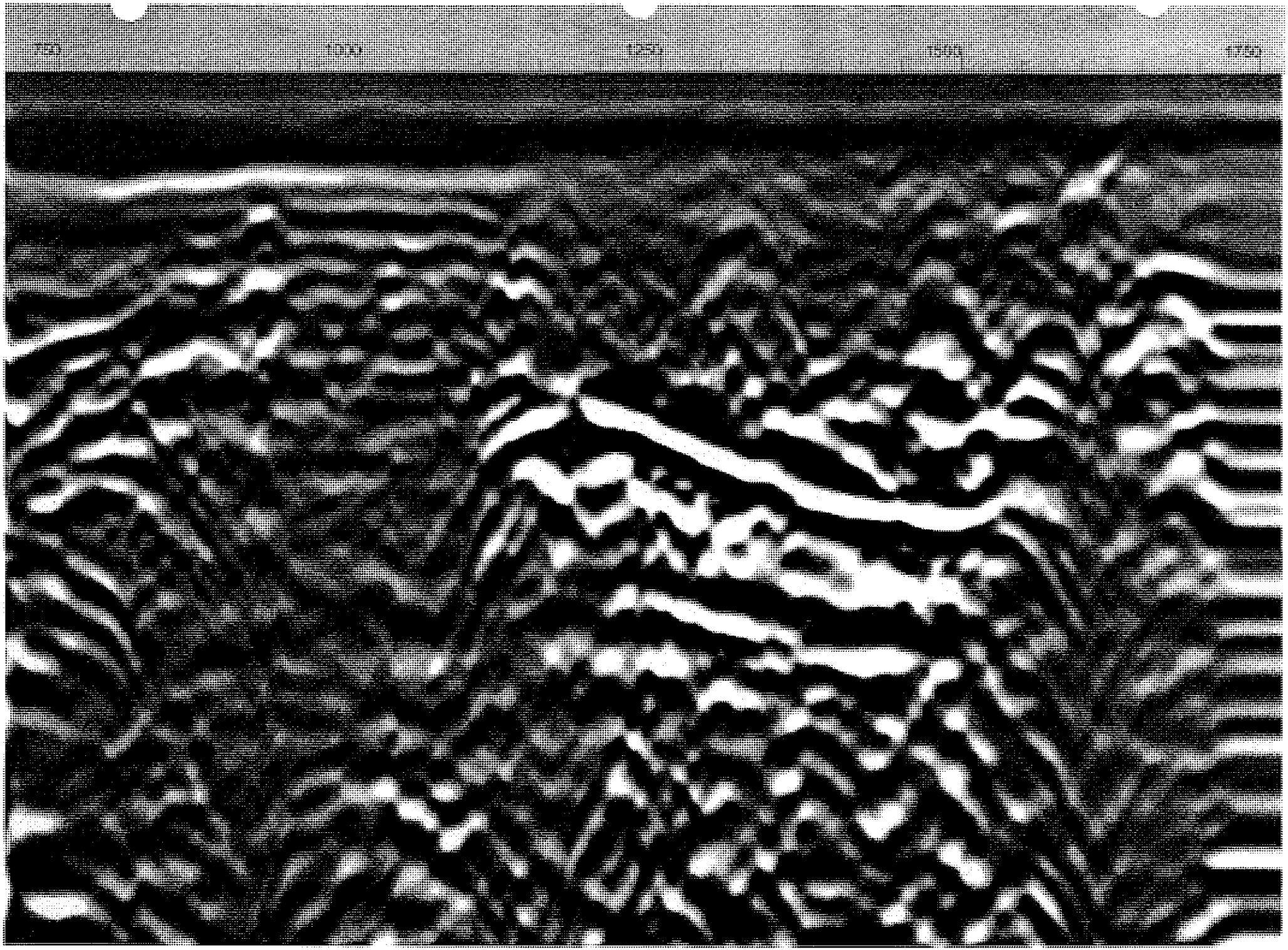
FIL .DZT

GE - Fletcher Paint
Elm Street Site
From Grid Location N12 to N14 + 20 ft.

Created Aug, 14 2003, 09:09:48 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) 3.0 36.0 44.0
56.0
Vert IIR LP N =1 F =610 MHz
Vert IIR HP N =2 F =35 MHz
Horz IIR Stack TC =3


0.0
1.00
2.00
3.00
4.00

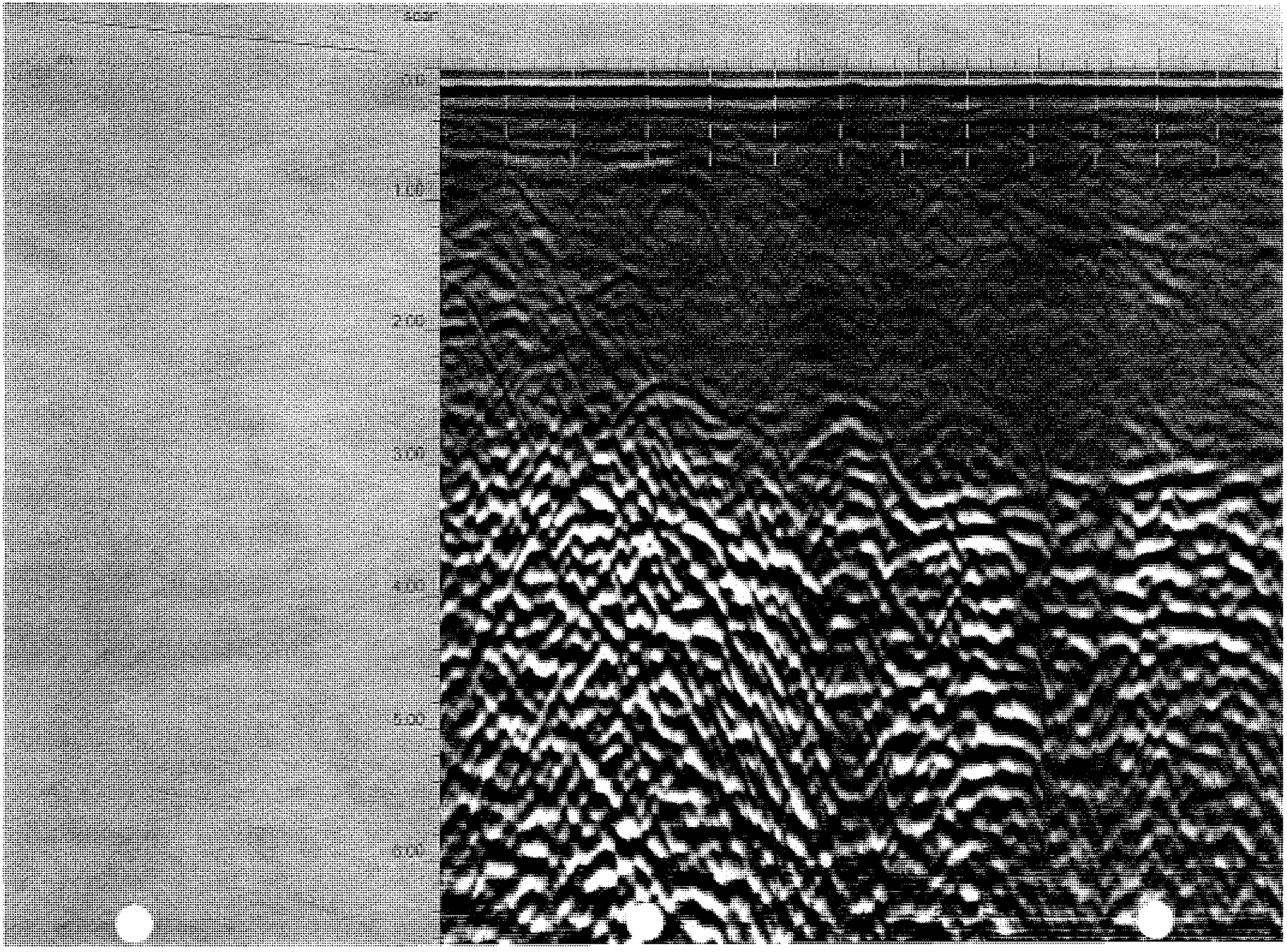

750
1000
1250
1500
1750

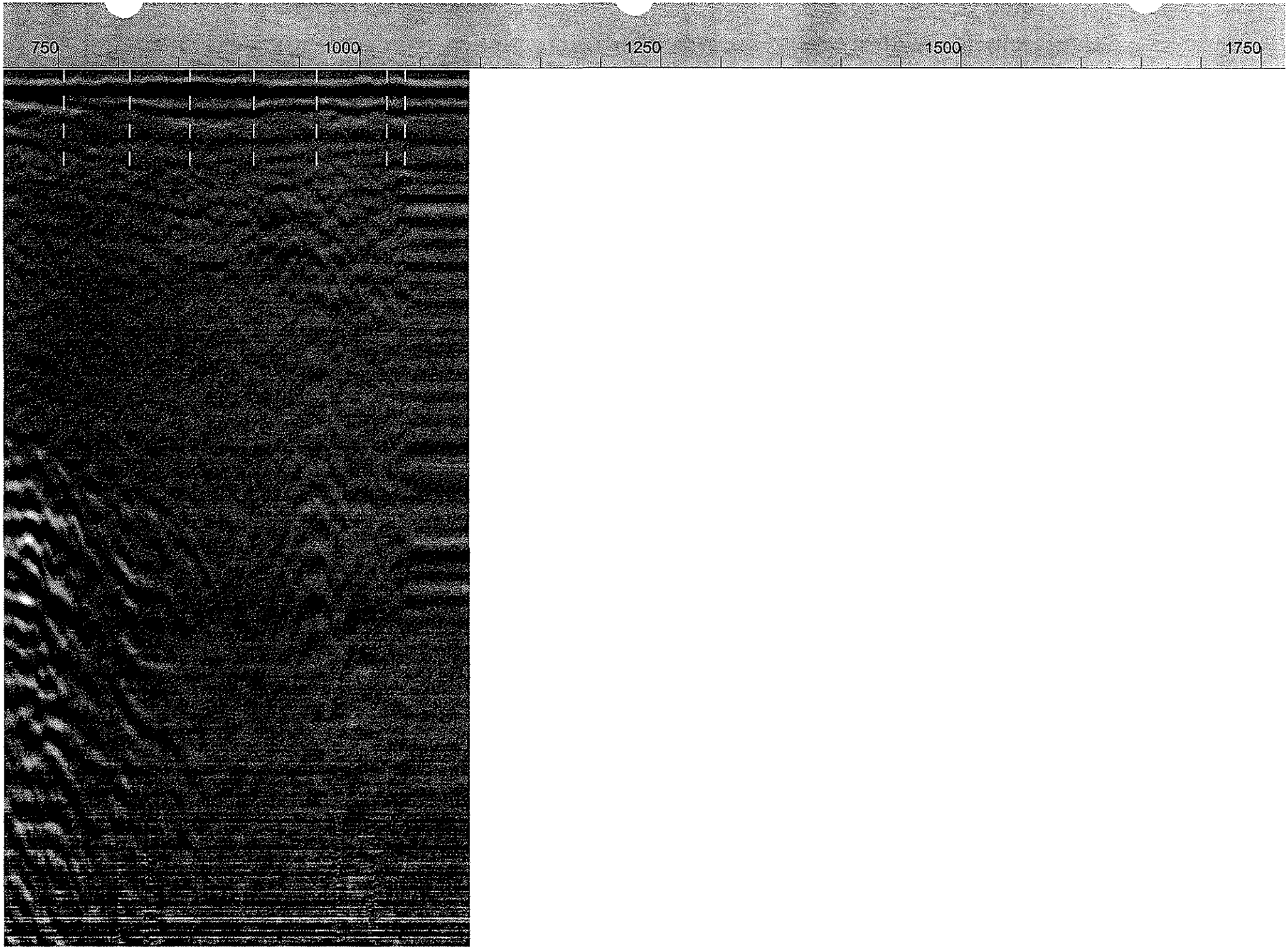
FIL .DZT

GE - Fletcher Paint
Elm Street Site
Center EM anomaly area - Surveyed from Grid Loction K08 + 5 ft east to H06 + 5 ft east.

Created Aug, 13 2003, 15:07:30 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) -4.0 22.0 53.0
64.0 76.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4

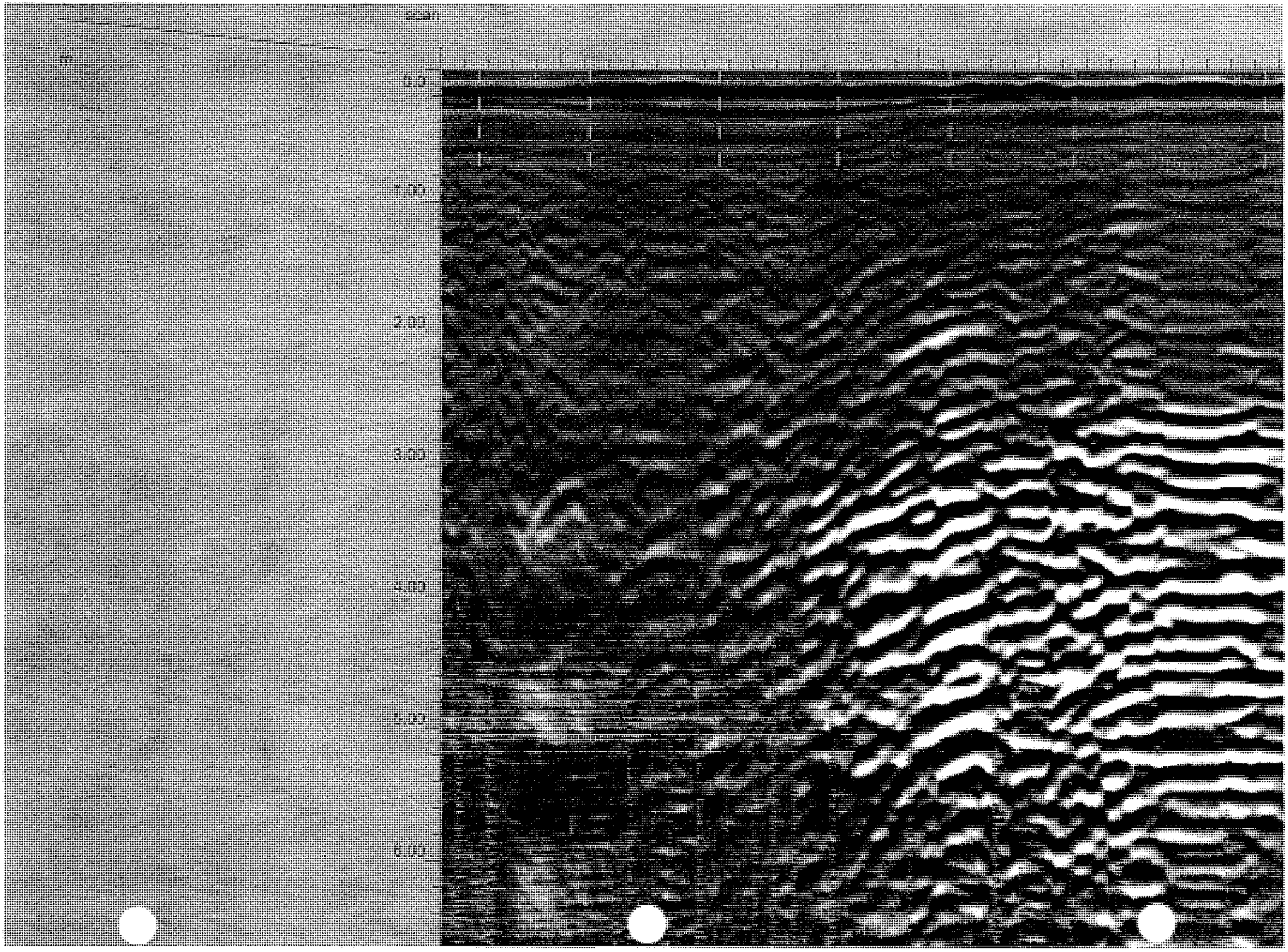


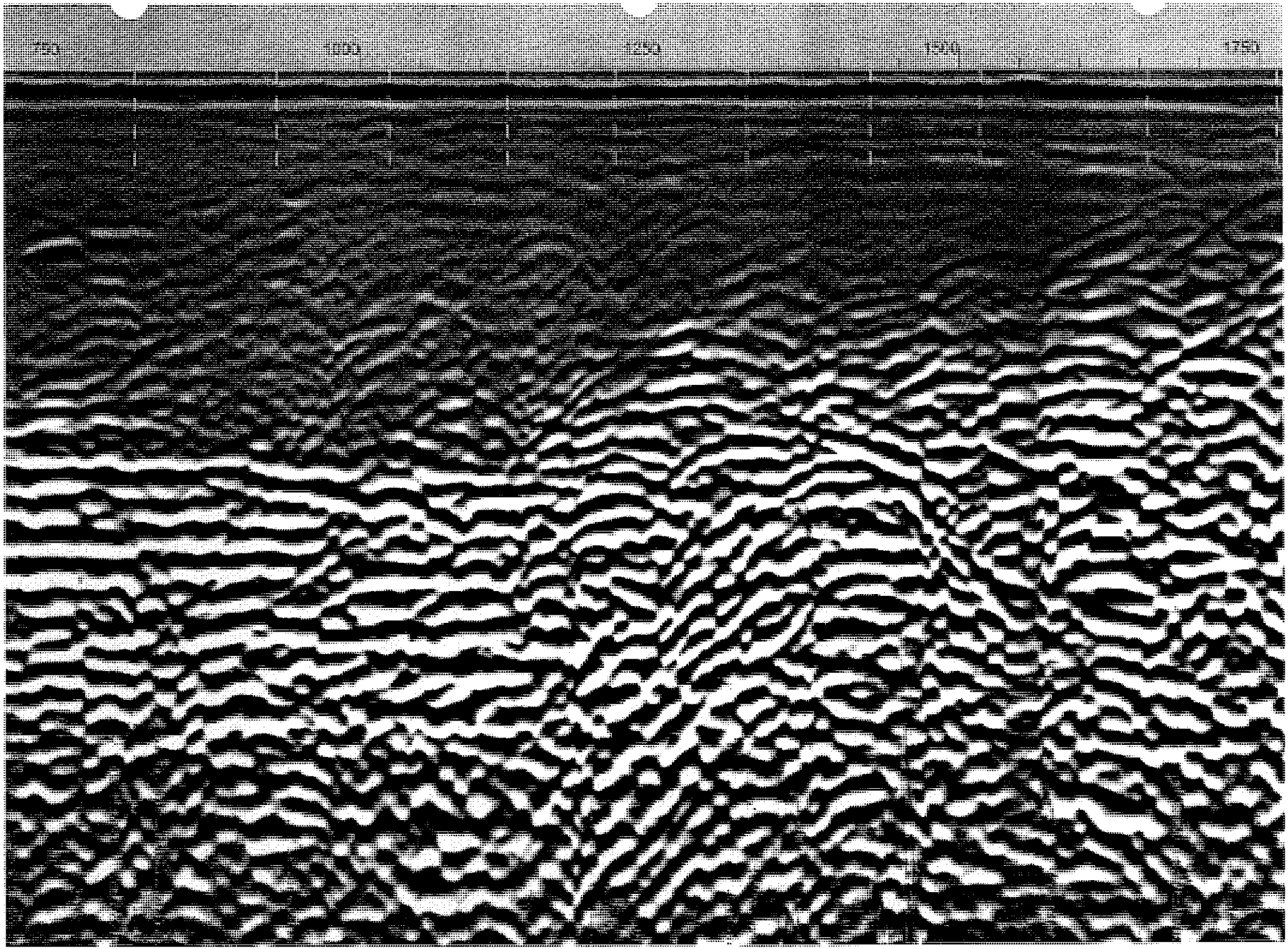

750
1000
1250
1500
1750

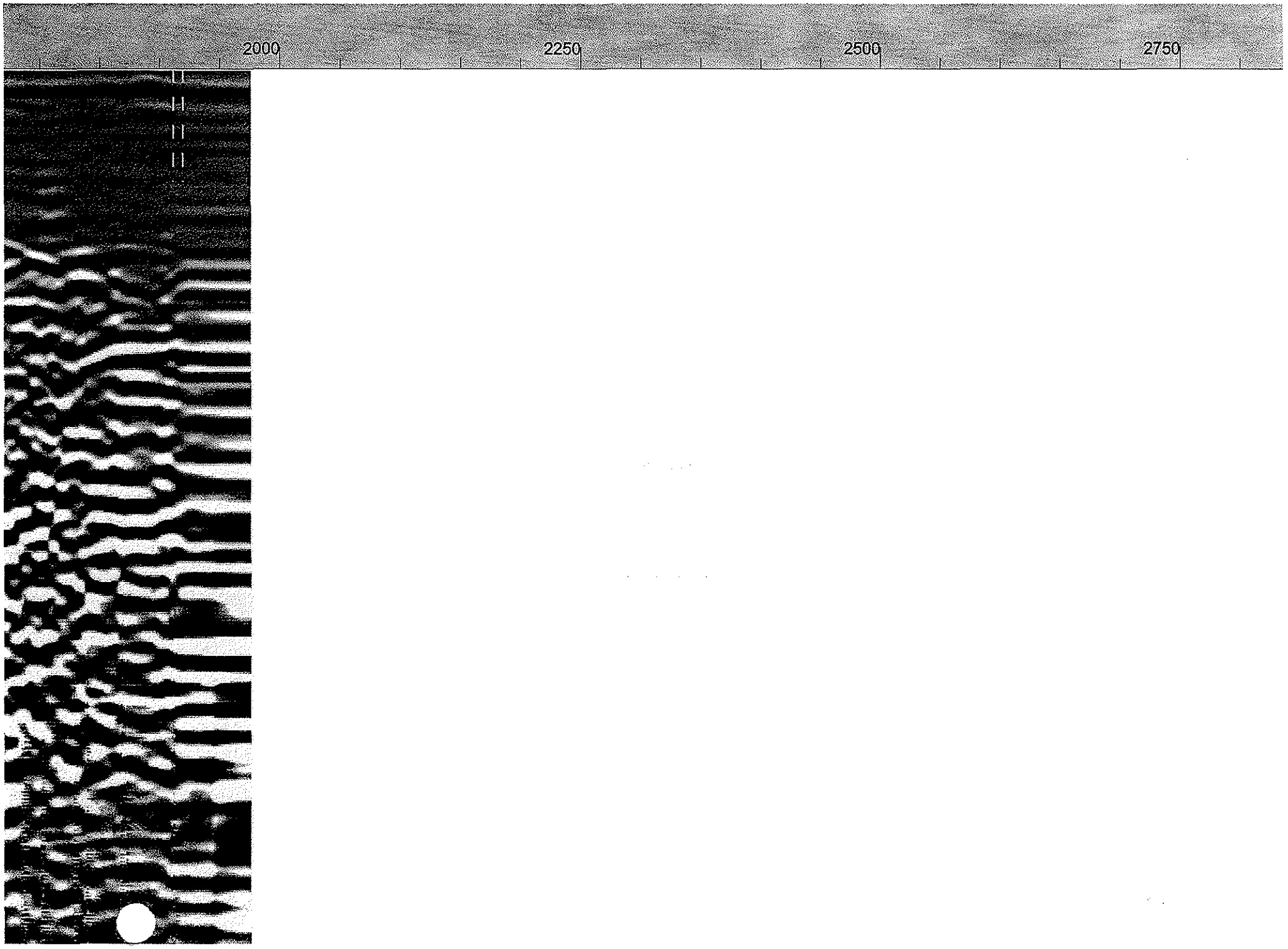
GE - Fletcher Paint
Elm Street Site
Center EM anomaly area - Surveyed from Grid Loction H06 to K08.

Created Aug, 13 2003, 15:02:04 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) 2.0 38.0 67.0
80.0 82.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4


0.0
1.00
2.00
3.00
4.00
5.00
6.00


750
1000
1250
1500
1750

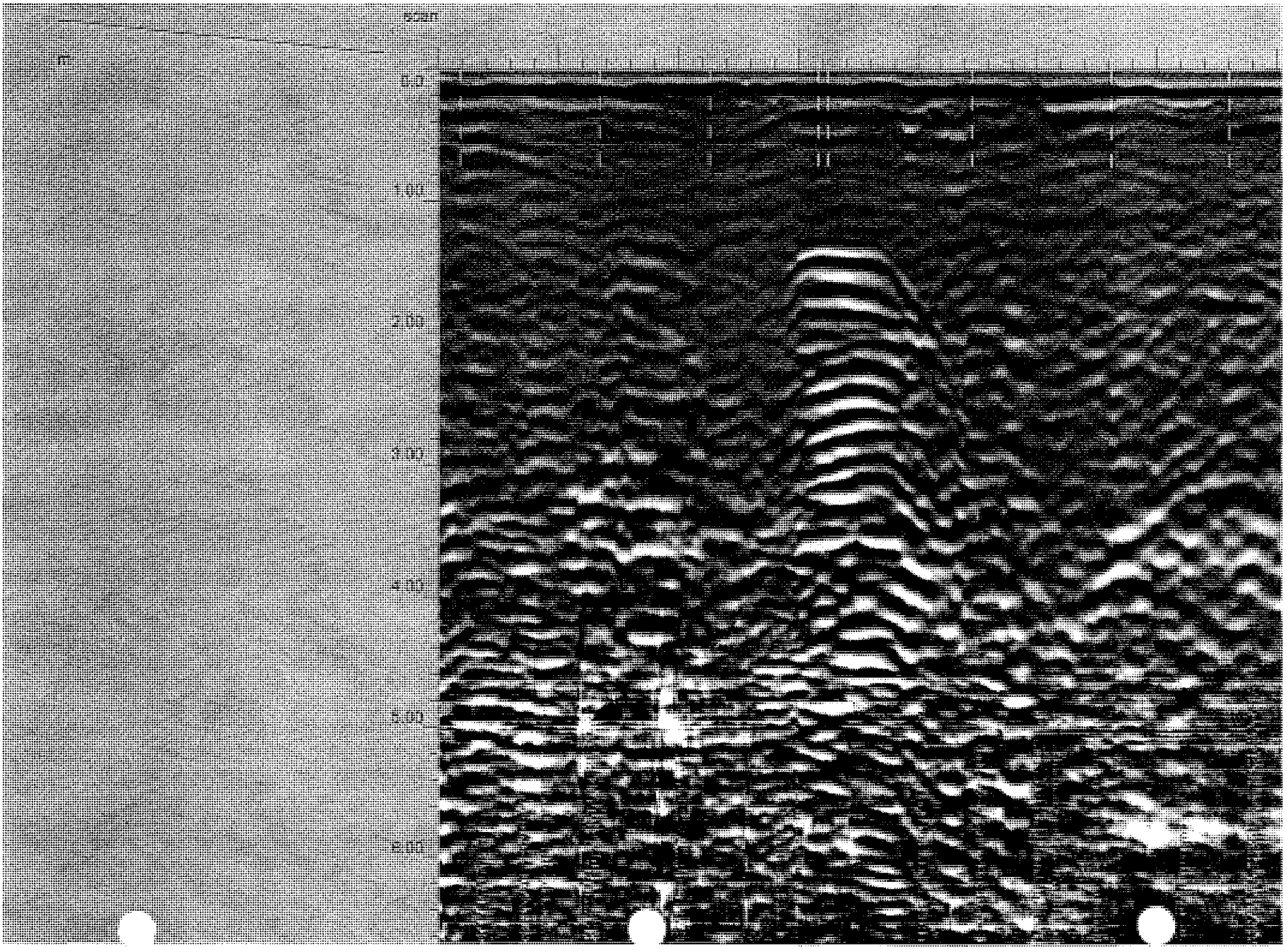

2000
2250
2500
2750

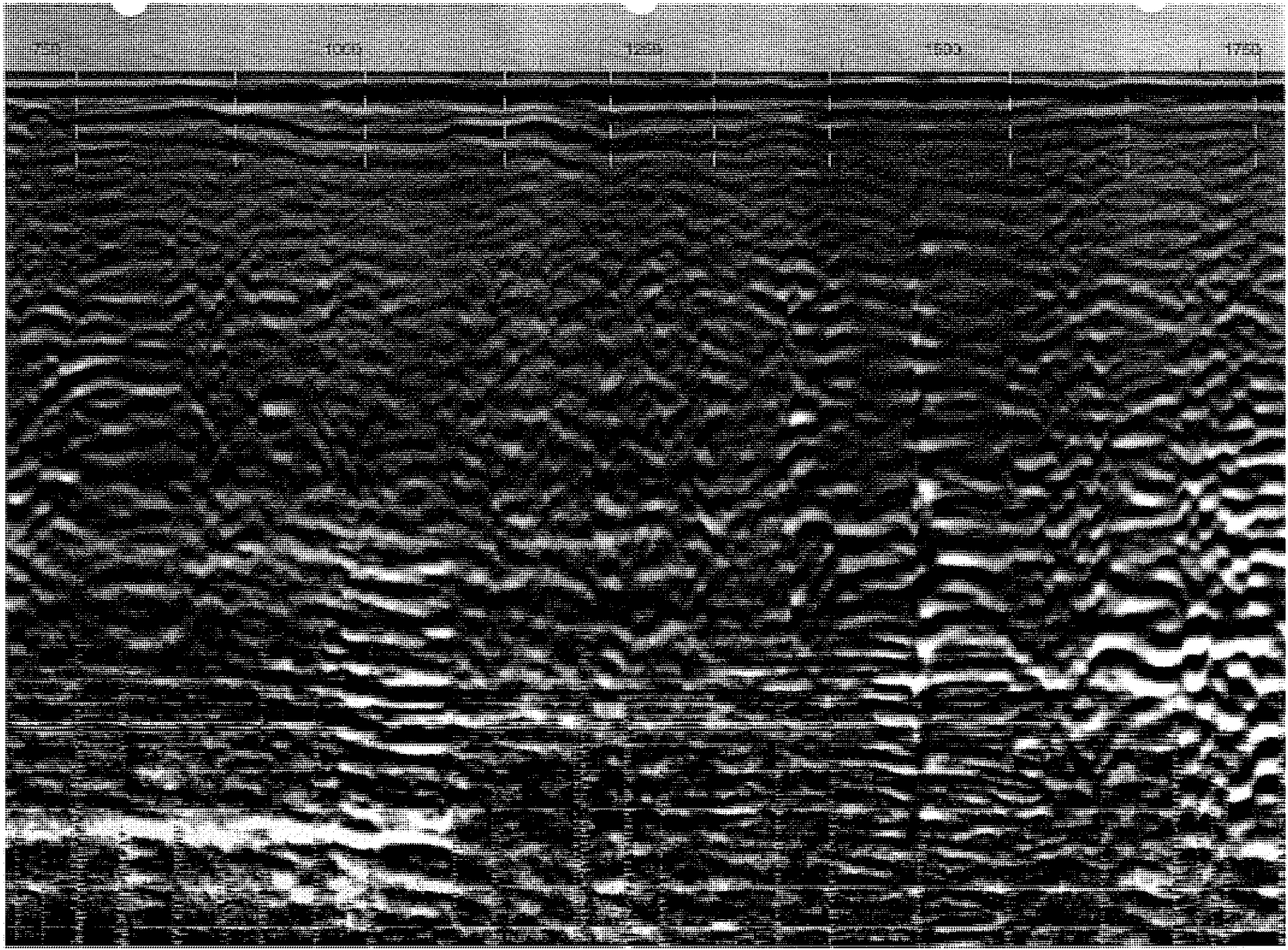
FIL .DZT

GE - Fletcher Paint
Elm Street Site
Moved 10 ft west of previous line and surveyed from fence to Grid Location G05 + 5 ft east.
Storm sewer pipe at 20 ft south along line.

Created Aug, 13 2003, 14:50:56 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) -4.0 33.0 60.0
77.0 81.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4


scan
m
0.0
1.00
2.00
3.00
4.00
5.00
6.00



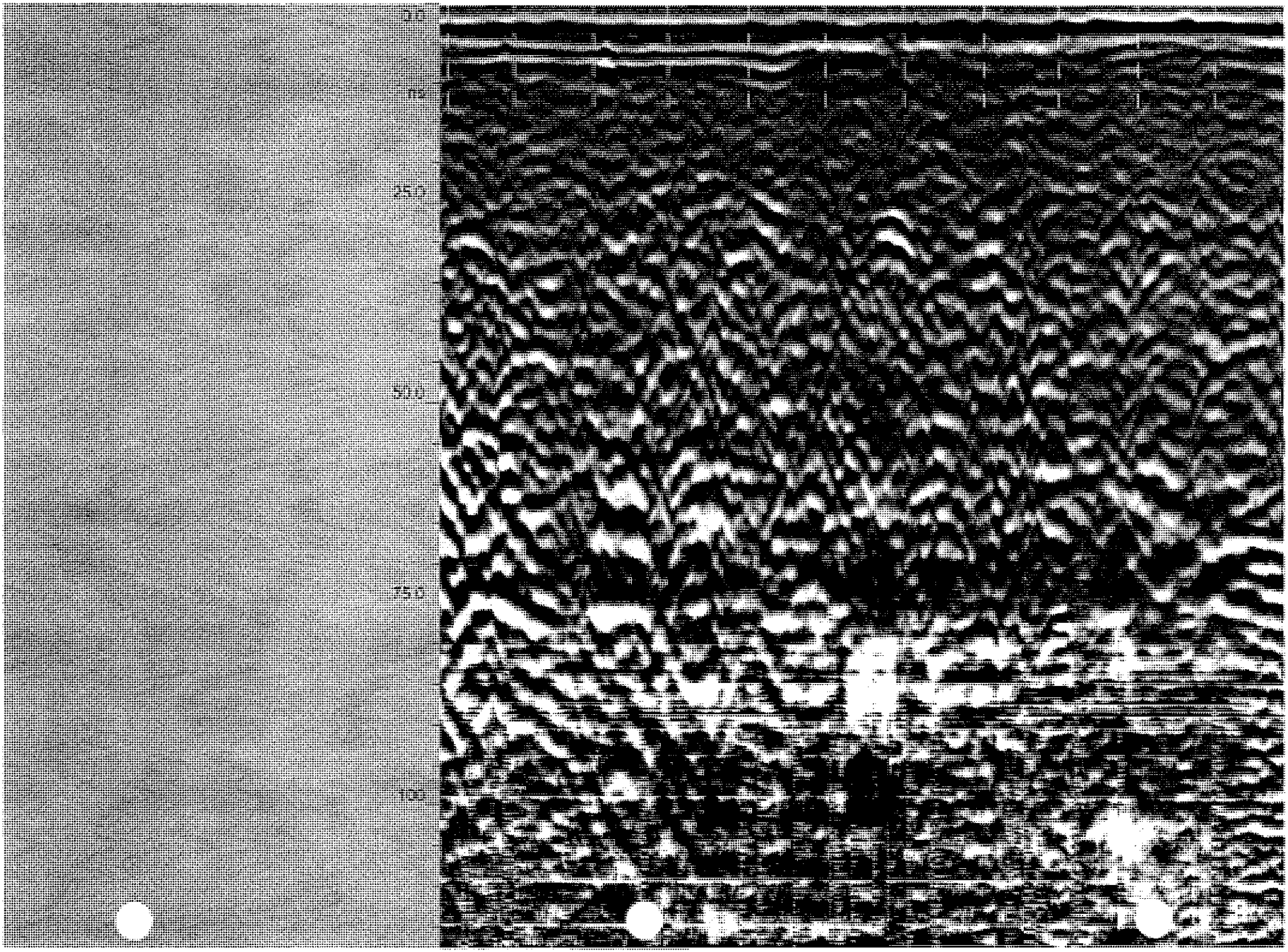
2000
2250
2500
2750

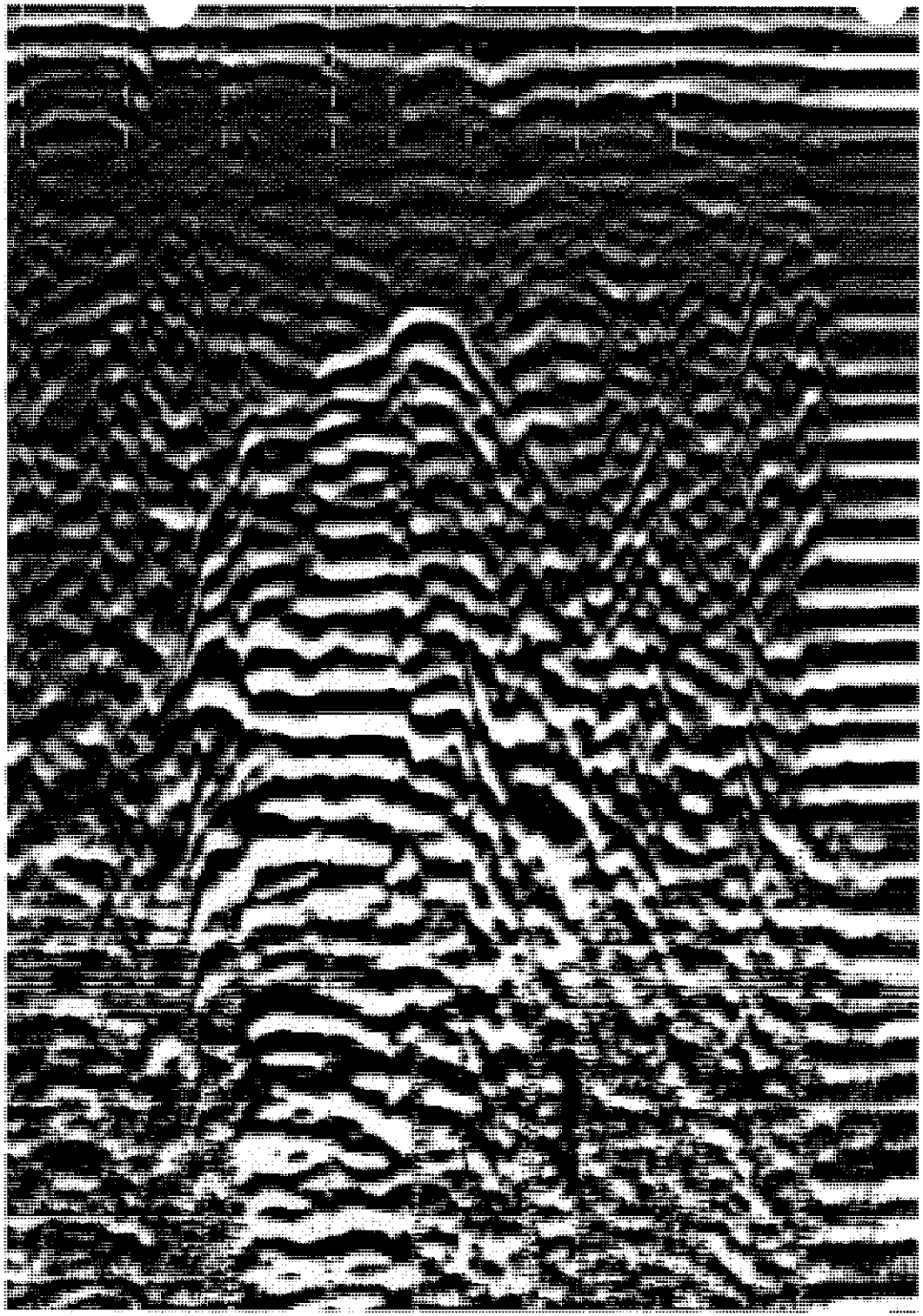
FIL DZT

GE - Fletcher Paint
Elm Street Site
Moved 5 ft west of previous line and surveyed from Grid Location G06 to fence.
Storm sewer pipe at 70 ft north along line.

Created Aug, 13 2003, 14:41:40 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) -4.0 33.0 60.0
77.0 81.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4



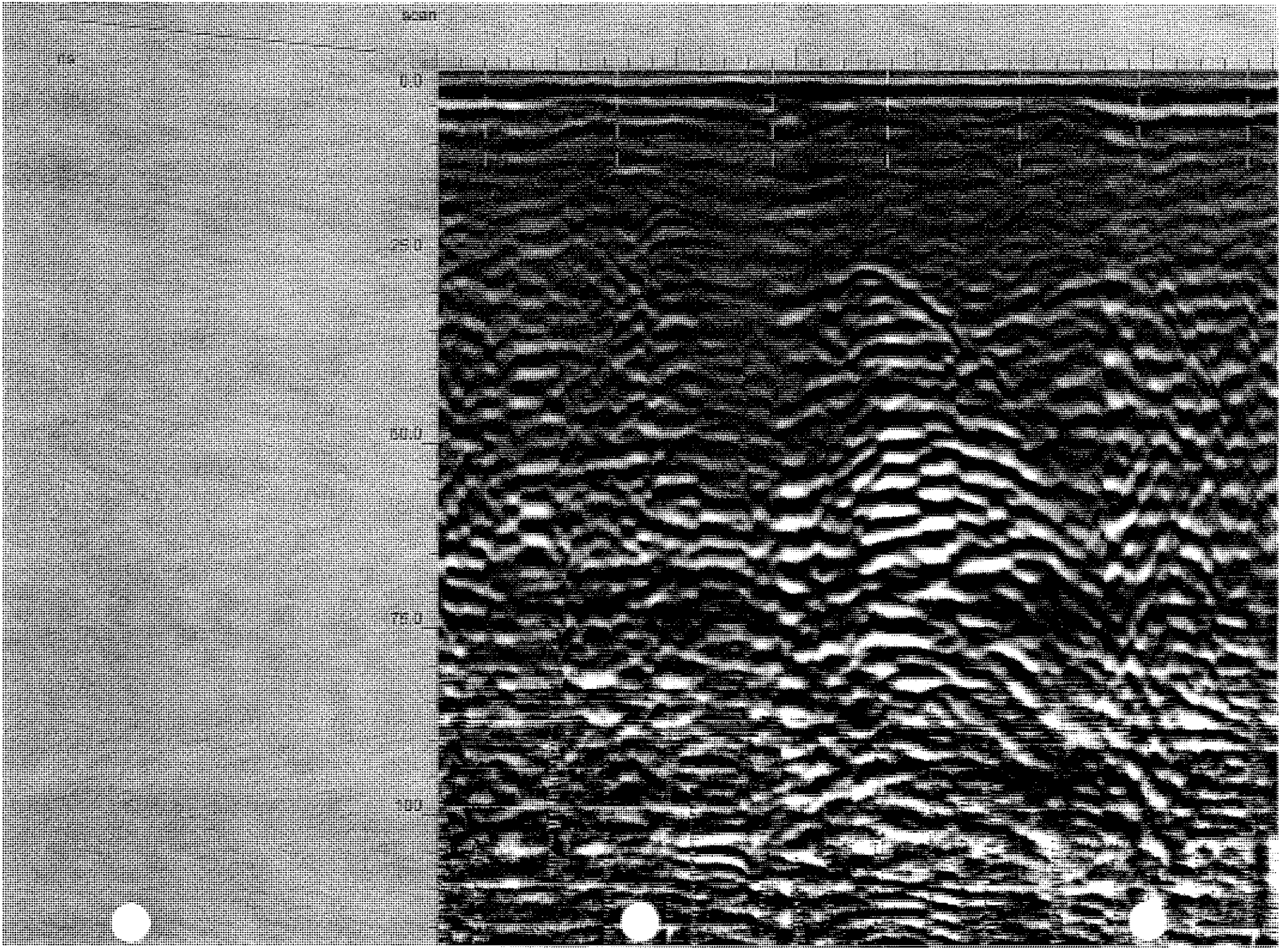


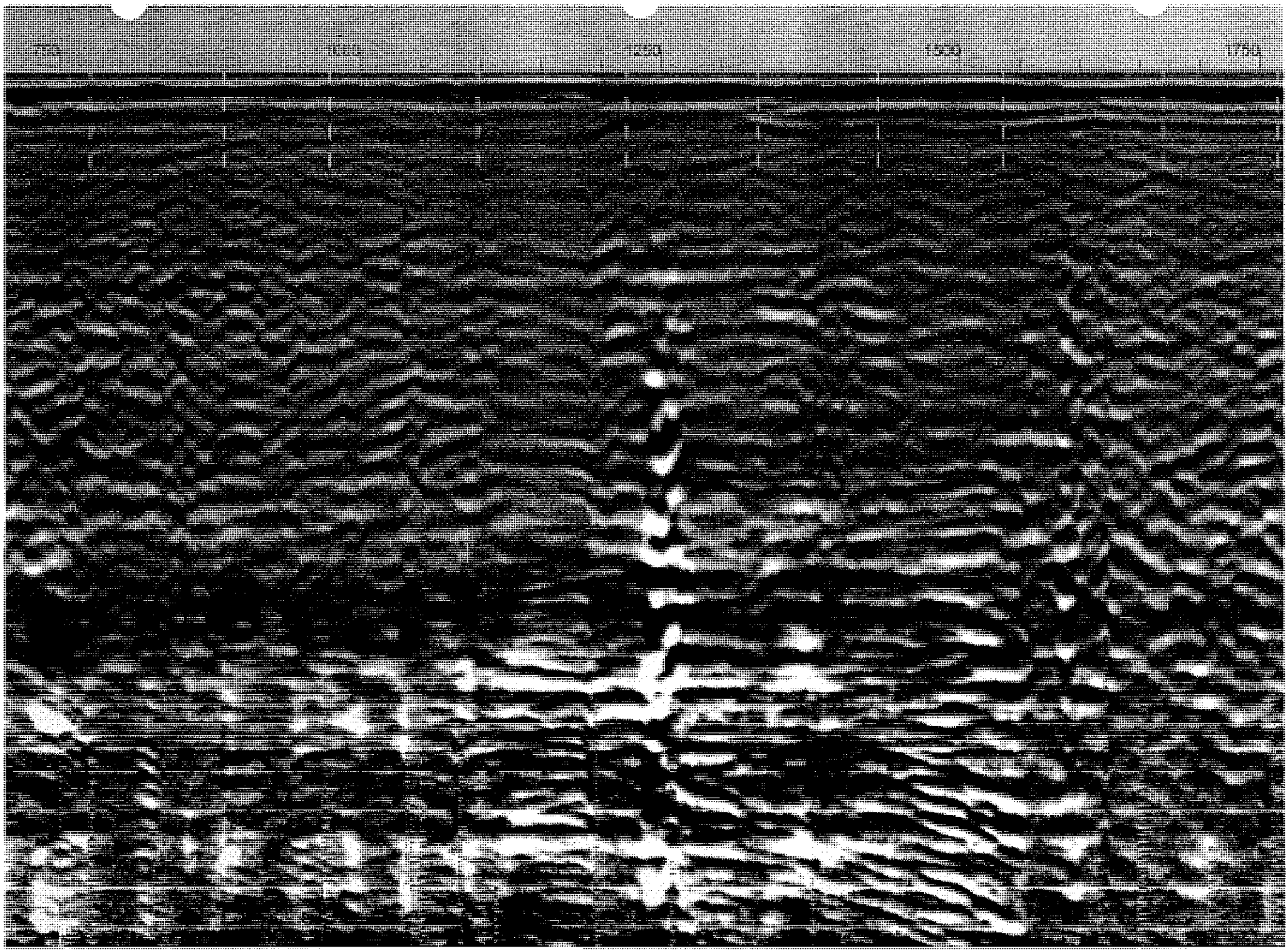
Fil .DZT

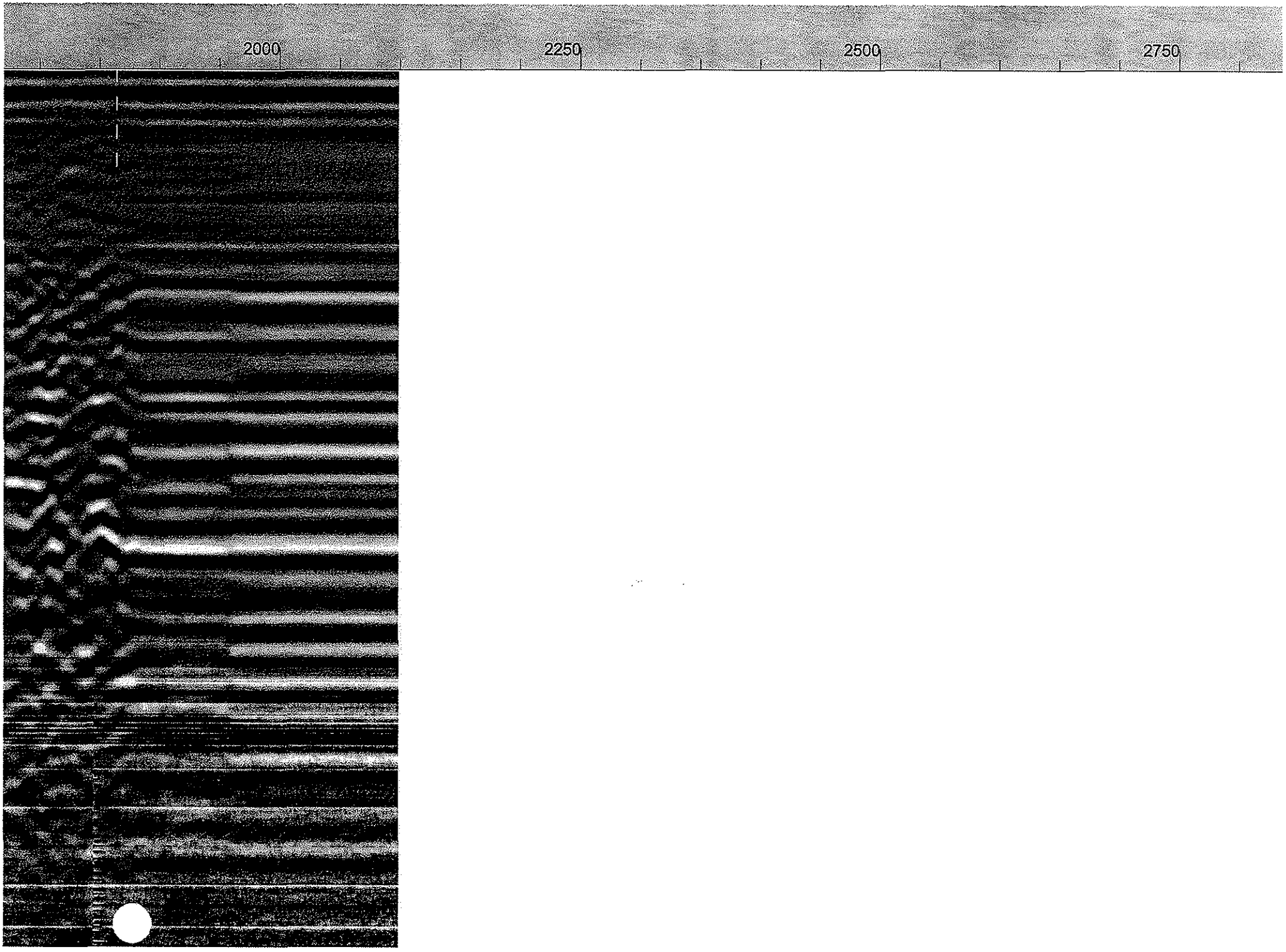
GE - Fletcher Paint
Elm Street Site
Antenna set up at Grid Location D04, profile south over EM anomaly to Grid Locaiton G06.
Storm Sewer pipe at 20 ft south along profile.

Created Aug, 13 2003, 14:36:32 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) -4.0 33.0 60.0
77.0 81.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4


Scan
0.0
25.0
50.0
75.0
100



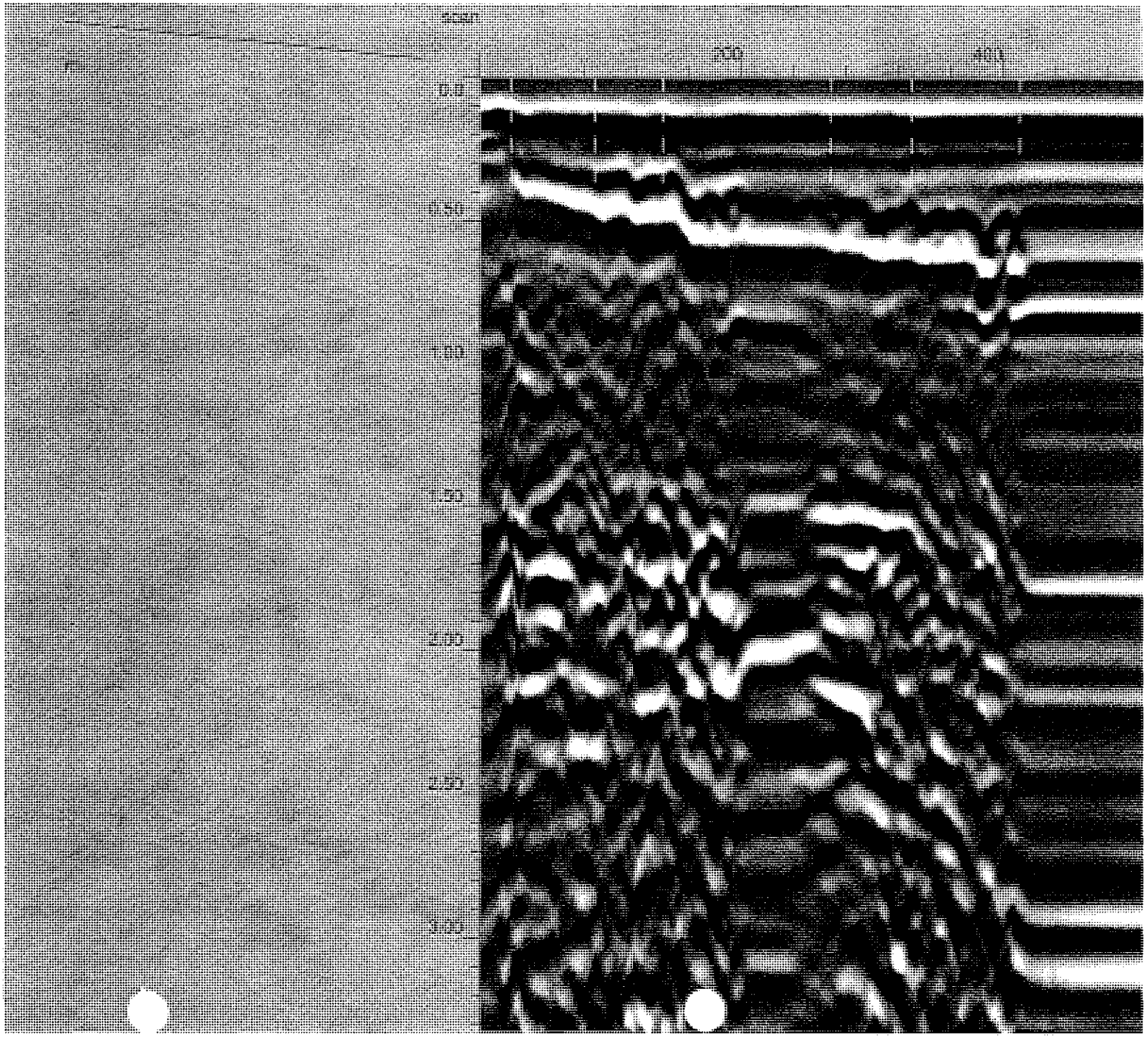

2000
2250
2500
2750

FIL .DZT

GE - Fletcher Paint
Elm Street Site
Depression Area by fence corner near P12 (from fence corner over void to 30 ft north of fence).

Created Aug, 13 2003, 13:55:58 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 60 nS
Range Gain (dB) 3.0 23.0 43.0
43.0 61.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4

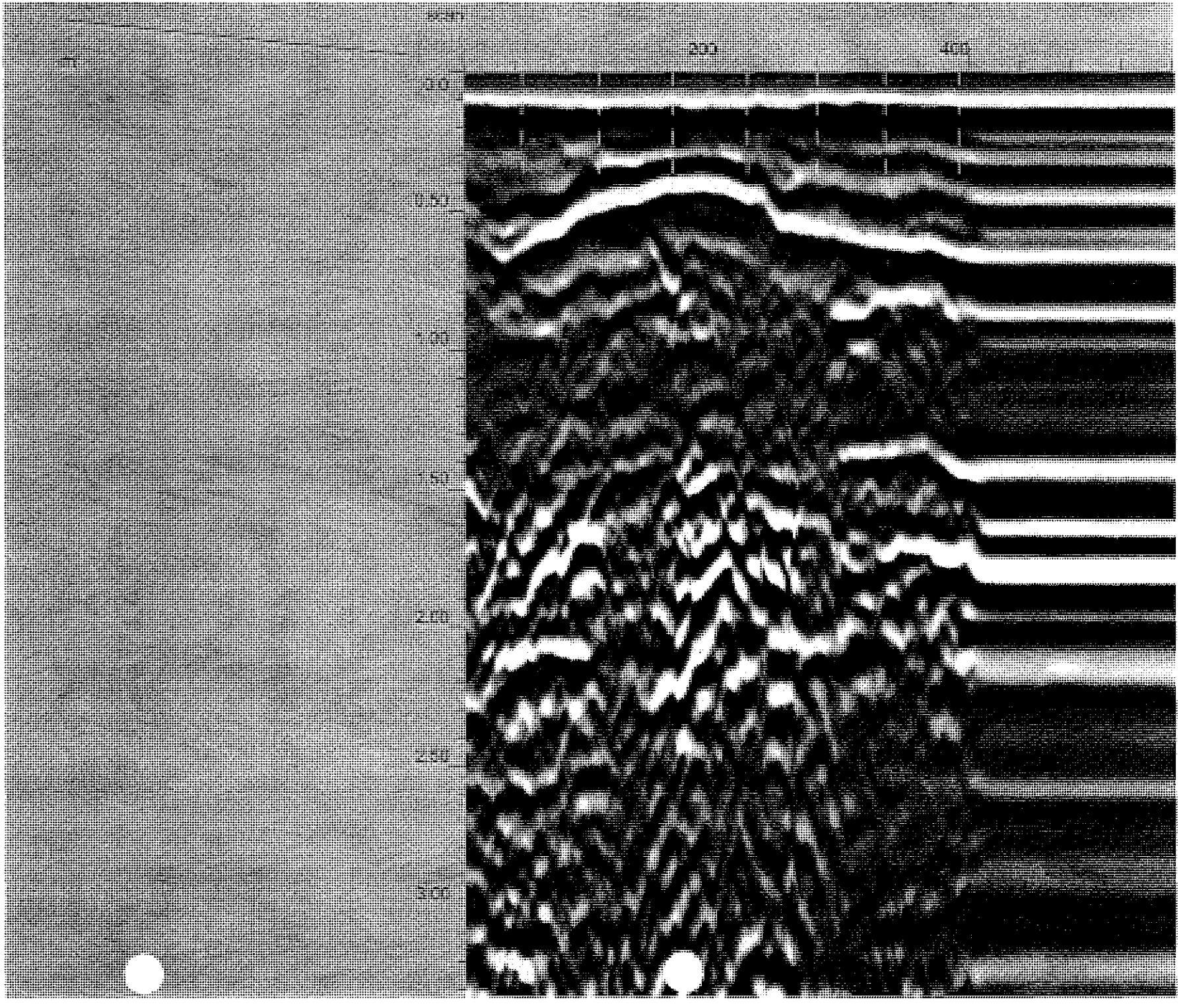

200
400
0.0
0.50
1.00
1.50
2.00
2.50
3.00

FIL DZT

GE - Fletcher Paint
Elm Street Site
Depression Area by fence corner near P12 (13 ft north of fence)

Created Aug, 13 2003, 13:49:24 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 60 nS
Range Gain (dB) 3.0 23.0 43.0
43.0 61.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4

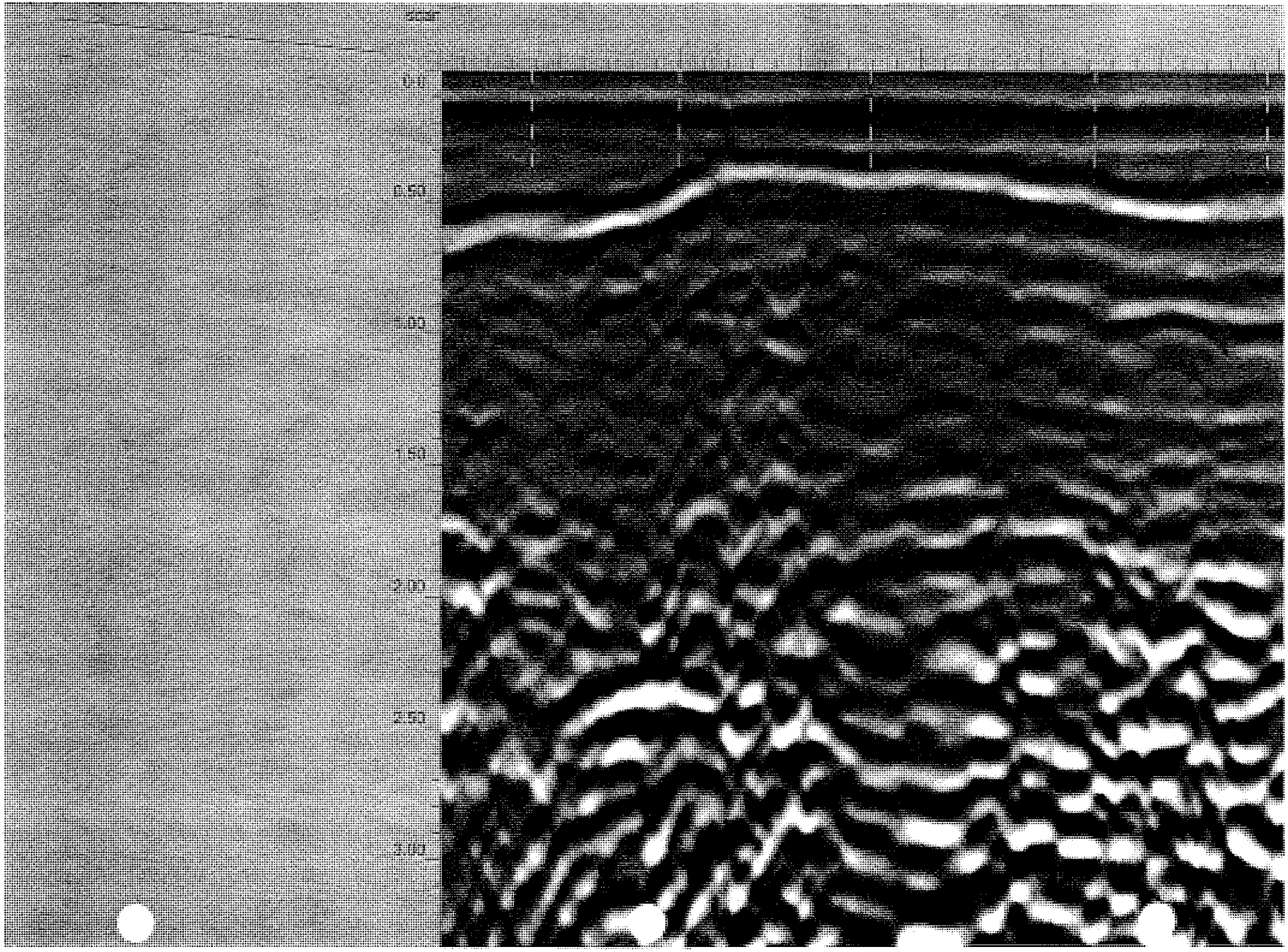

200
400
0.50
1.00
1.50
2.00
2.50
3.00

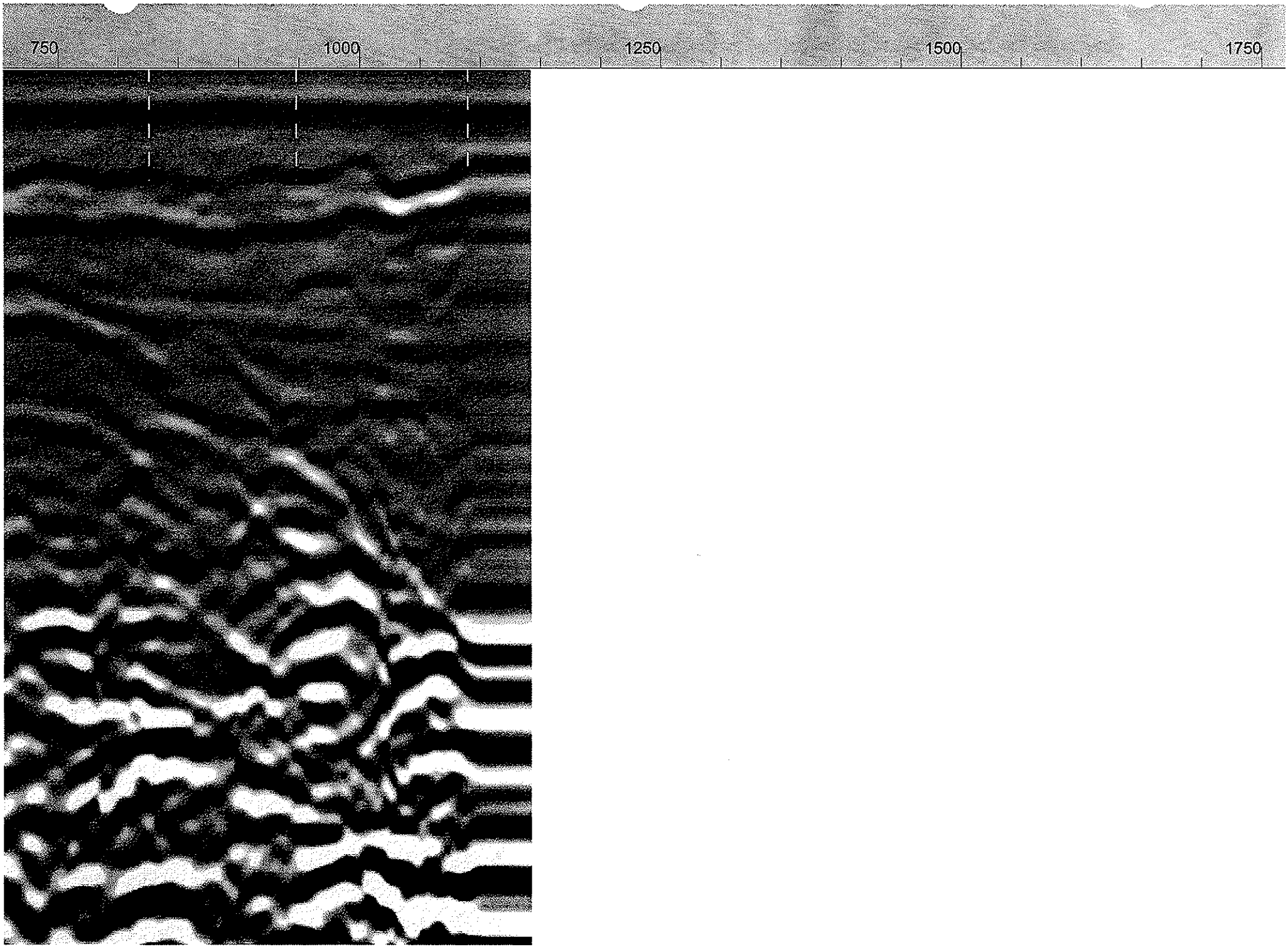
FIL DZT

GE - Fletcher Paint
Elm Street Site
Depression Area by fence corner near P12 (8 ft north of fence)

Created Aug, 13 2003, 13:45:46 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 60 nS
Range Gain (dB) -1.0 22.0 40.0
56.0 69.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4

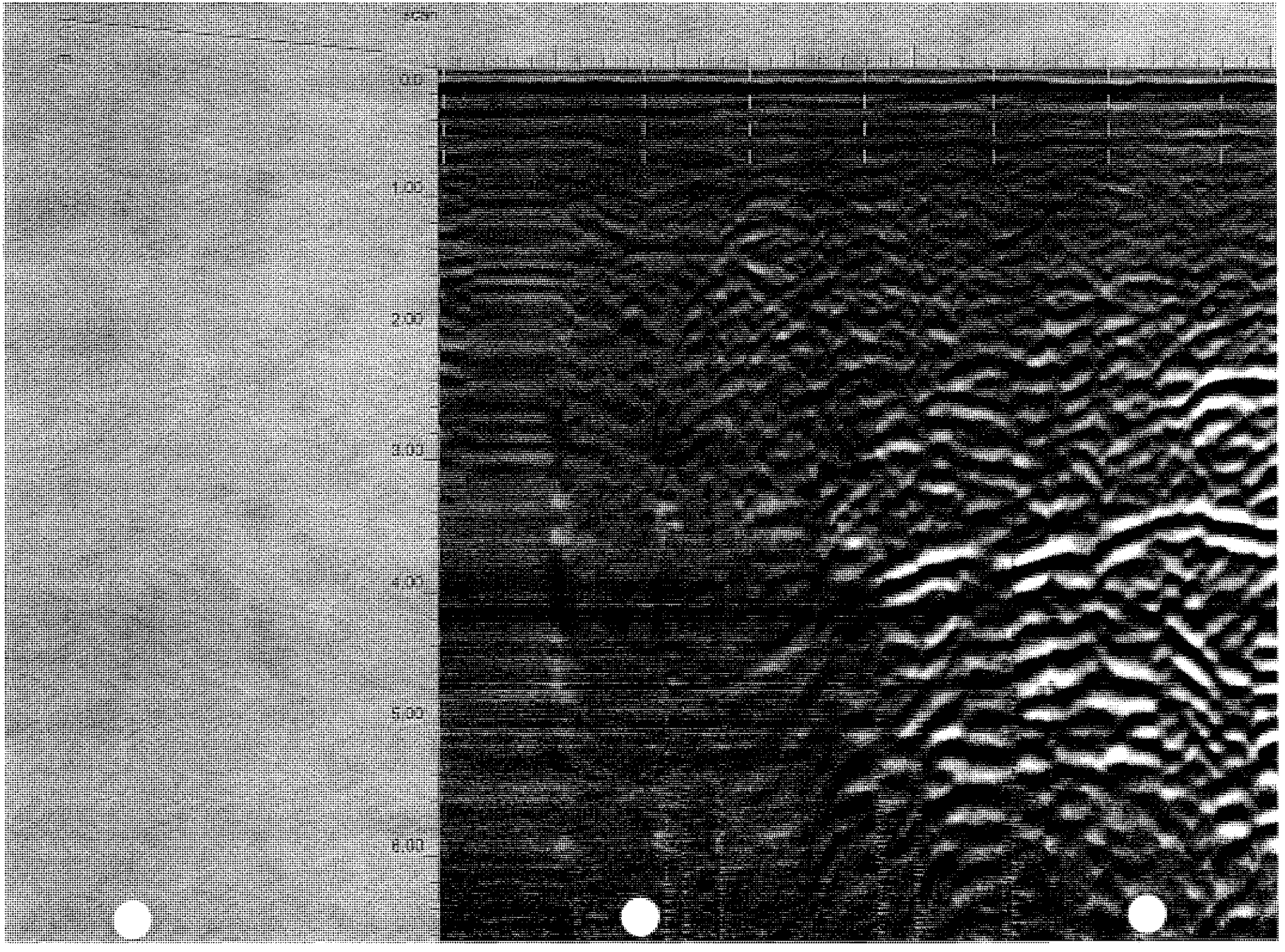

0.00
0.50
1.00
1.50
2.00
2.50
3.00

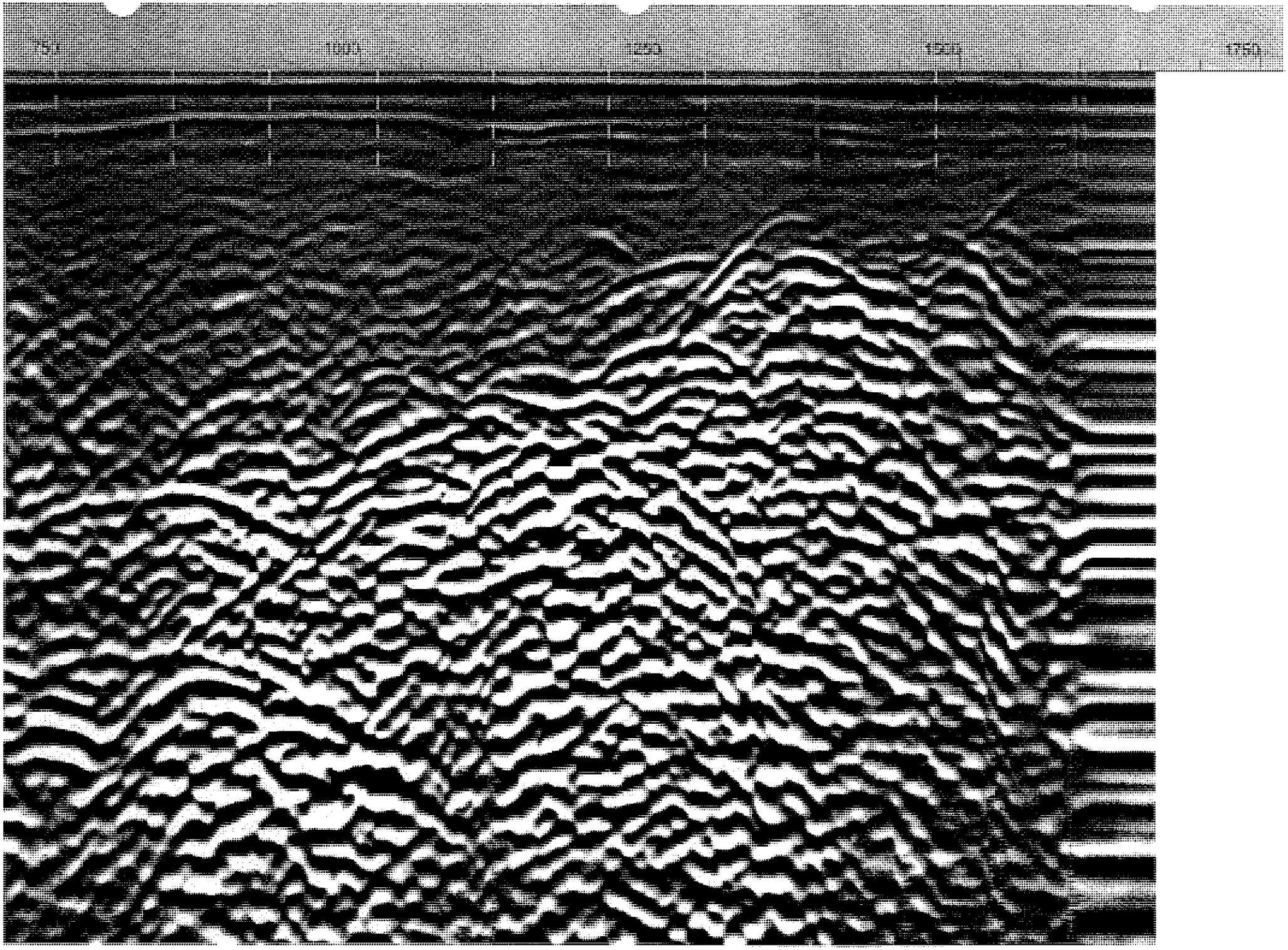

750
1000
1250
1500
1750

GE - Fletcher Paint
Elm Street Site
Center EM anomaly area - Surveyed from Grid Loction H06 + 10 ft east to J08 + 20 ft south.

Created Aug, 13 2003, 15:13:02 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) 2.0 42.0 68.0
77.0 83.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4


0.00
1.00
2.00
3.00
4.00
5.00
6.00

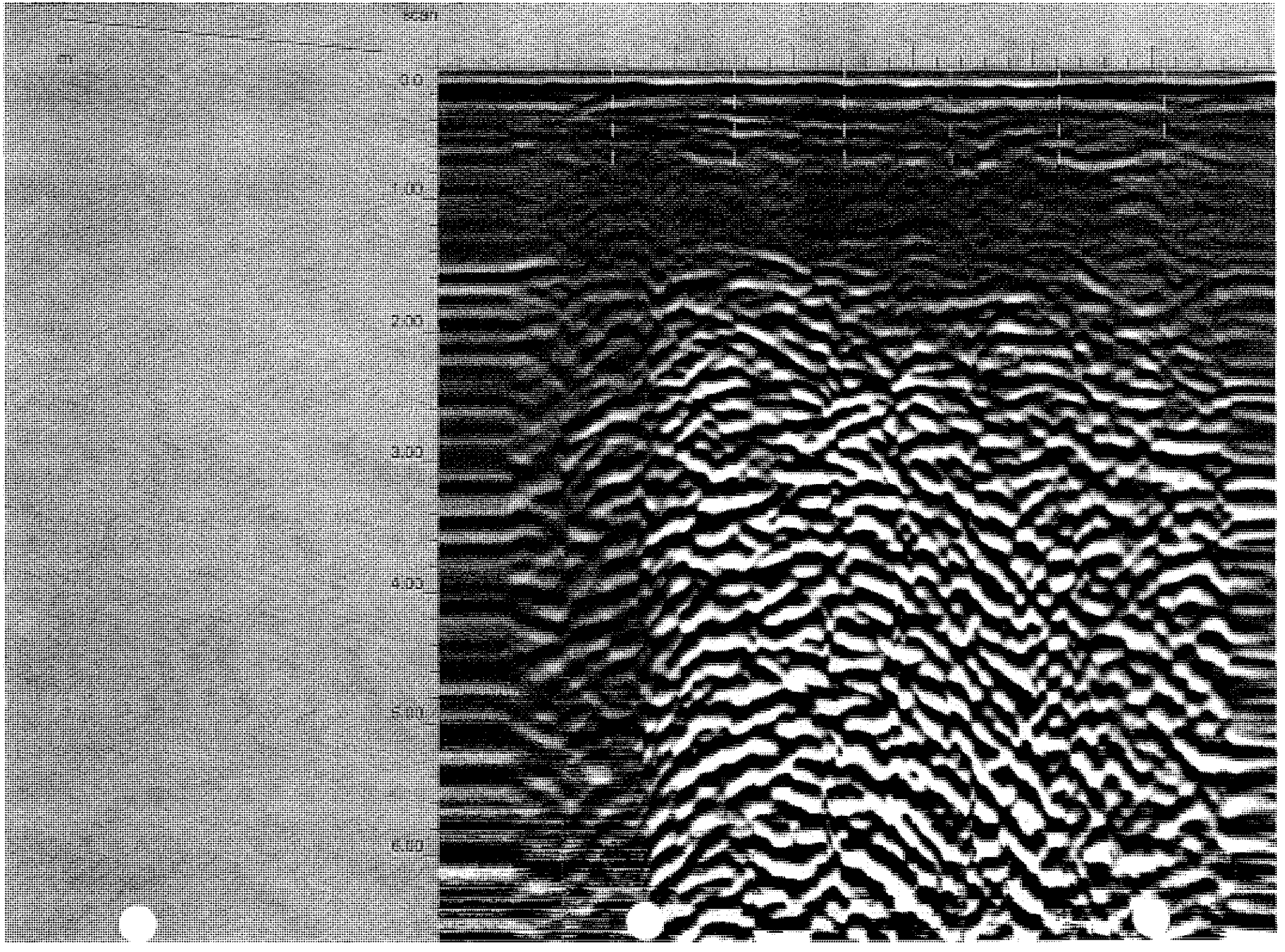

750
1000
1250
1500
1750

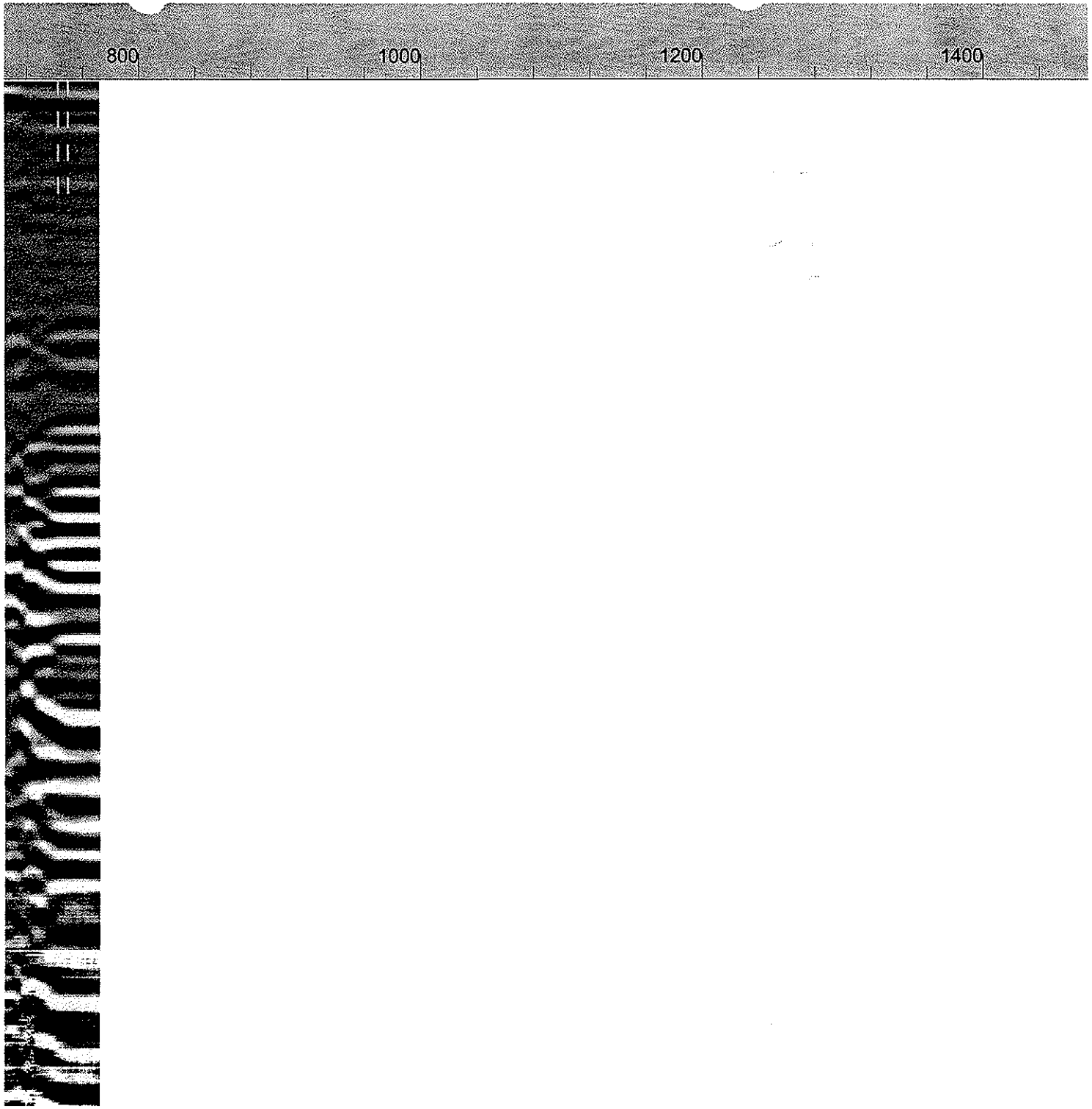
FIL DZT

GE - Fletcher Paint
Elm Street Site
Center EM anomaly area - East-West profile, 15 ft north of K line (fence to fence).

Created Aug, 13 2003, 15:33:18 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) -1.0 32.0 53.0
70.0 82.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4


m
0.0
1.00
2.00
3.00
4.00
5.00
6.00

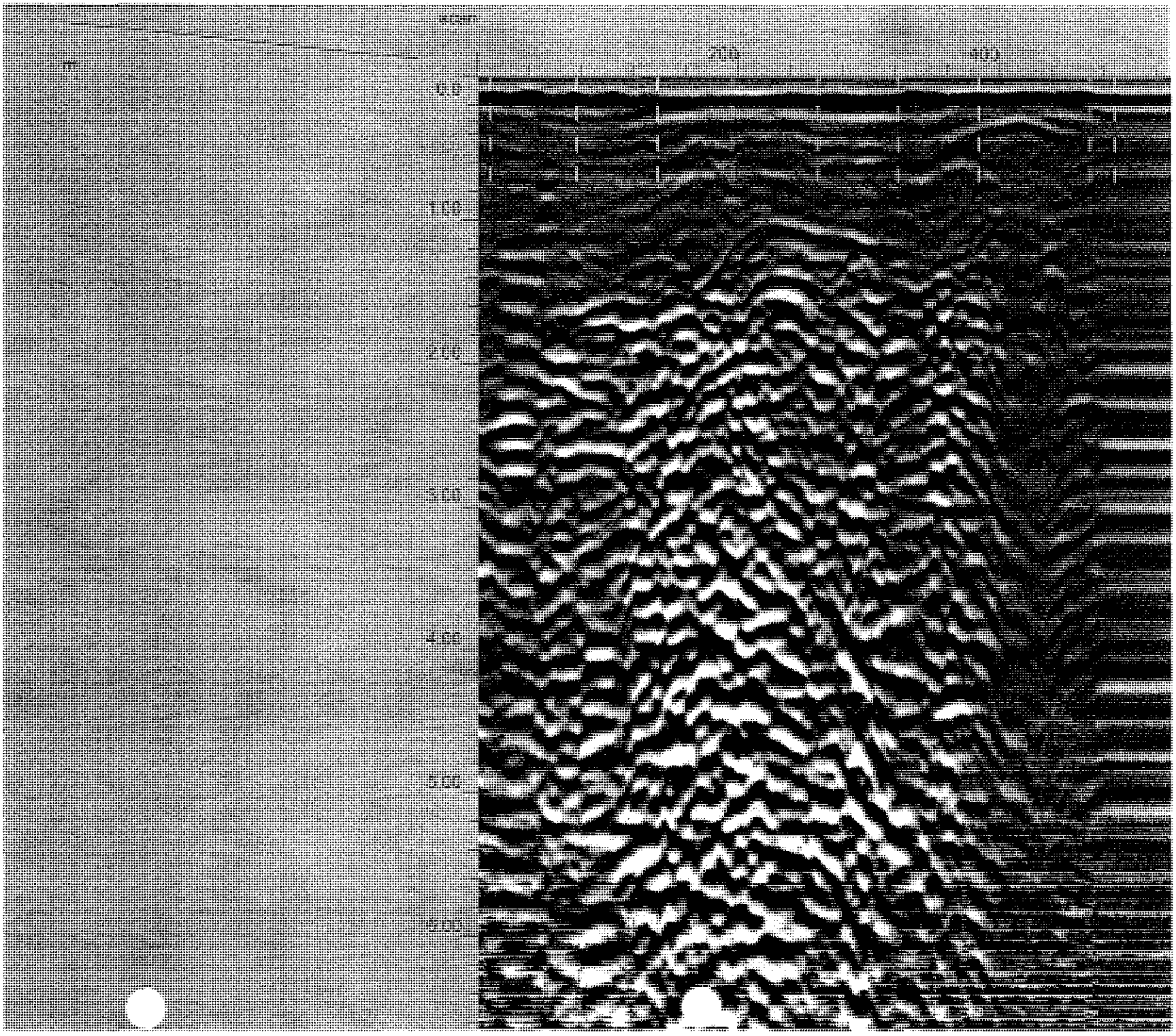

800
1000
1200
1400

FIL DZT

GE - Fletcher Paint
Elm Street Site
Center EM anomaly area - East-West profile, 6 ft north of K line (fence to fence).

Created Aug, 13 2003, 15:29:44 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

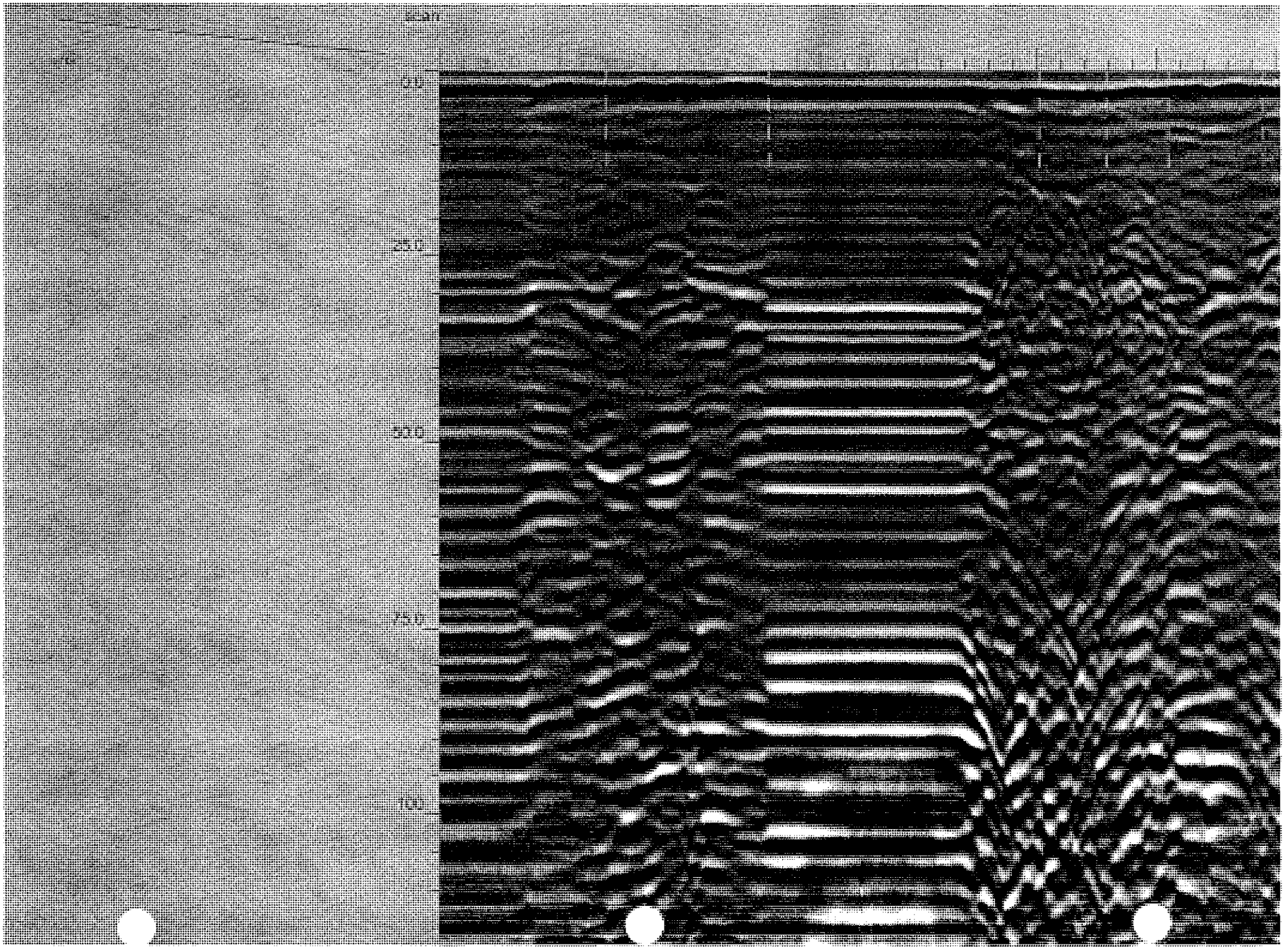
CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) -1.0 32.0 53.0
70.0 82.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4

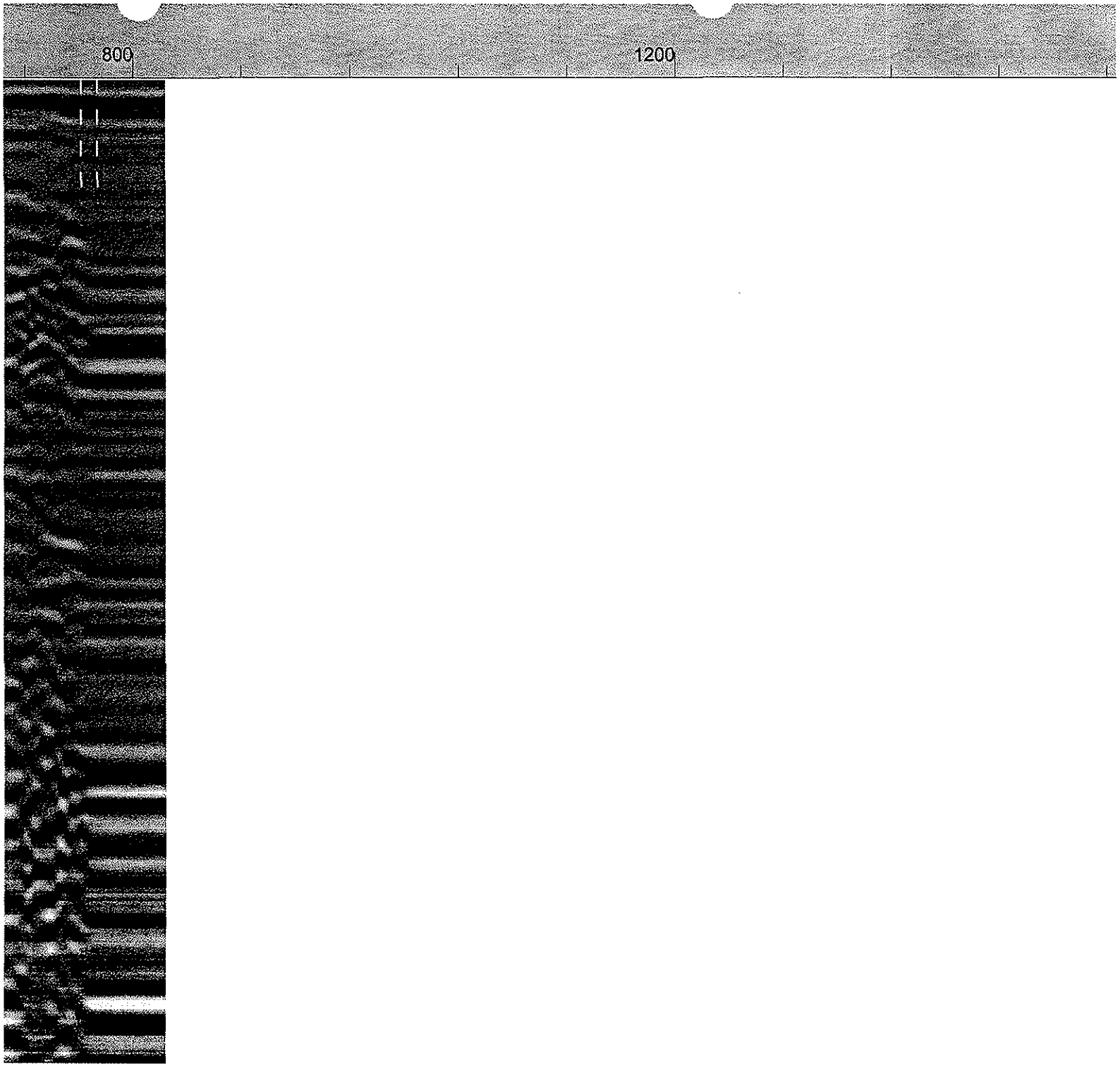

0.0
100
200
300
400
500
600

GE - Fletcher Paint
Elm Street Site
Center EM anomaly area - East-West profile, 20 ft north of K line (fence to fence).

Created Aug, 13 2003, 15:44:24 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) 3.0 43.0 45.0
70.0 77.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4

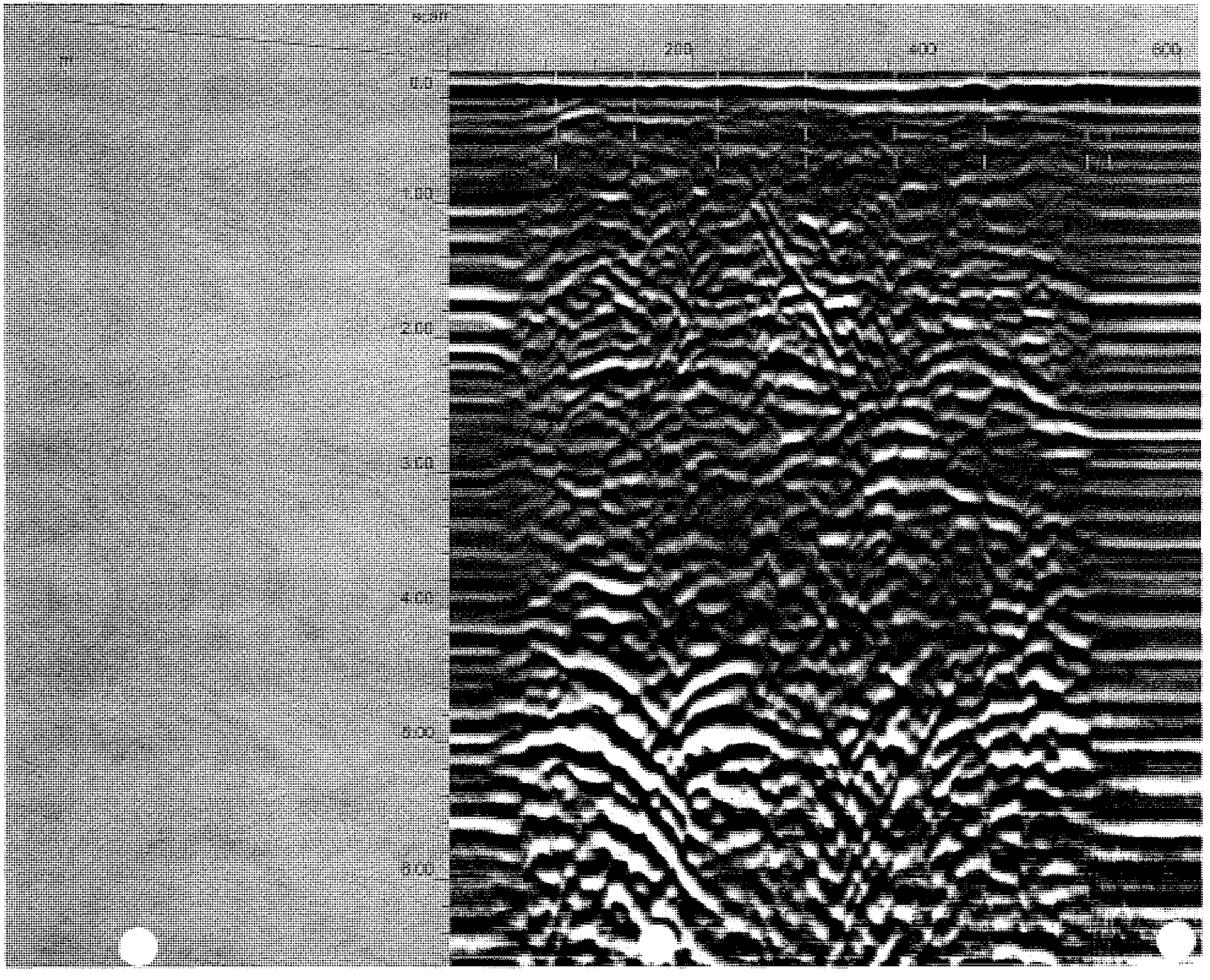

scan
20
25.0
30.0
35.0
40.0


800
1200

GE - Fletcher Paint
Elm Street Site
Center EM anomaly area - East-West profile, along J line (fence to fence).

Created Aug, 13 2003, 15:48:00 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) 3.0 43.0 45.0
70.0 77.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4

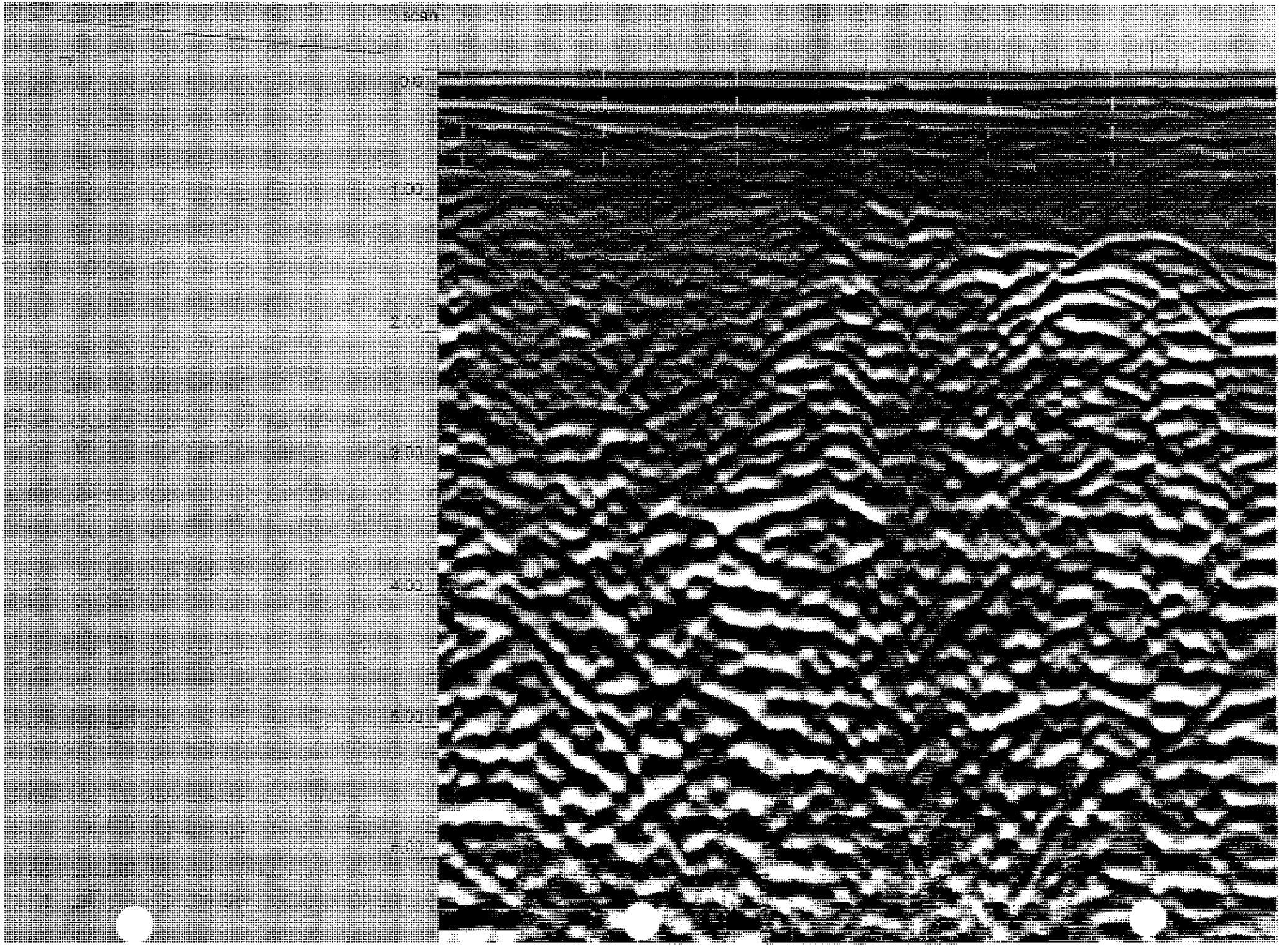

0.00
1.00
2.00
3.00
4.00
5.00
6.00
200
400
600

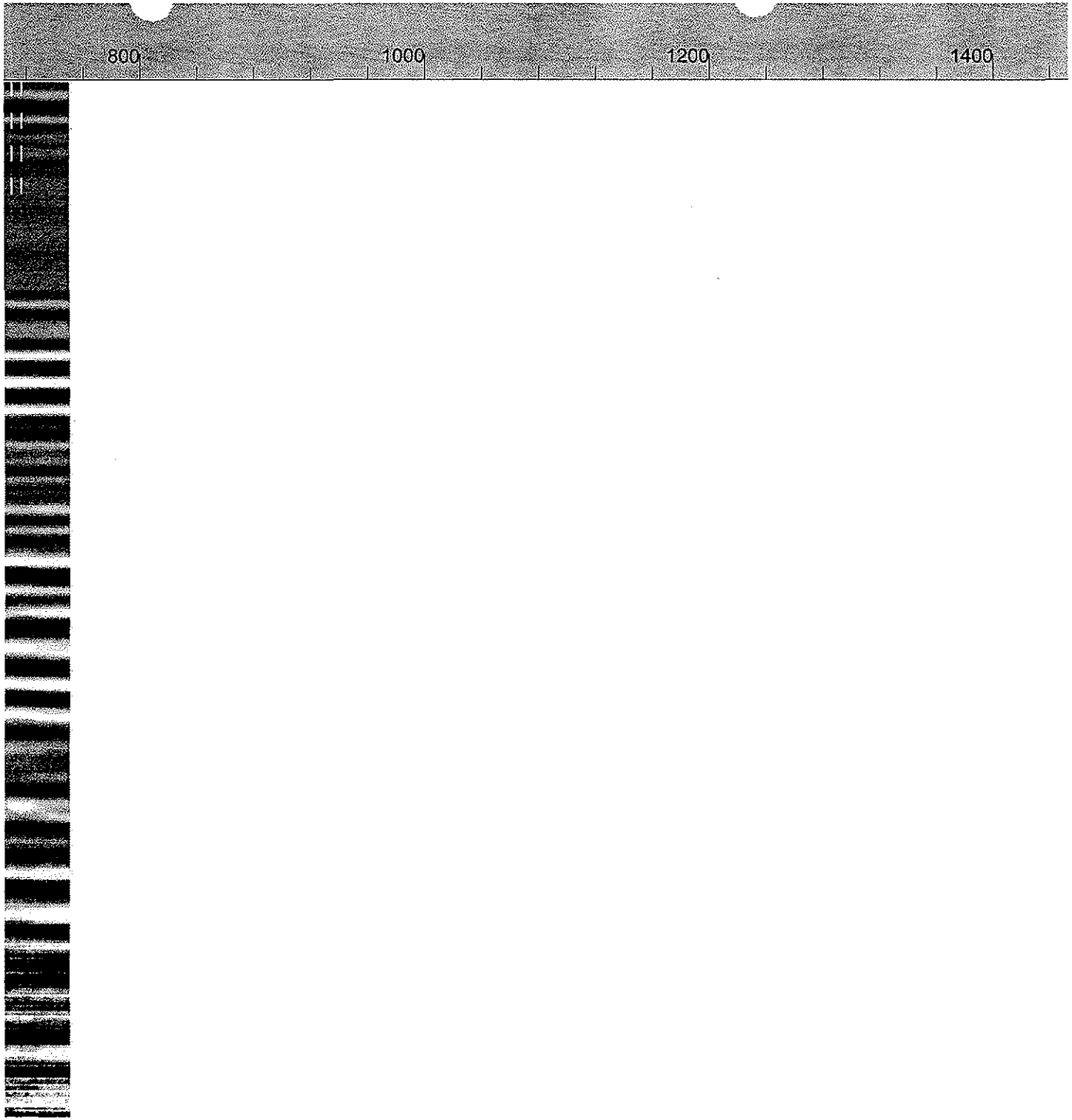
FIL .DZT

GE - Fletcher Paint
Elm Street Site
Center EM anomaly area - East -West profile along K line (fence to fence).

Created Aug, 13 2003, 15:23:58 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) -1.0 32.0 53.0
70.0 82.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4


0.0
1.00
2.00
3.00
4.00
5.00
6.00

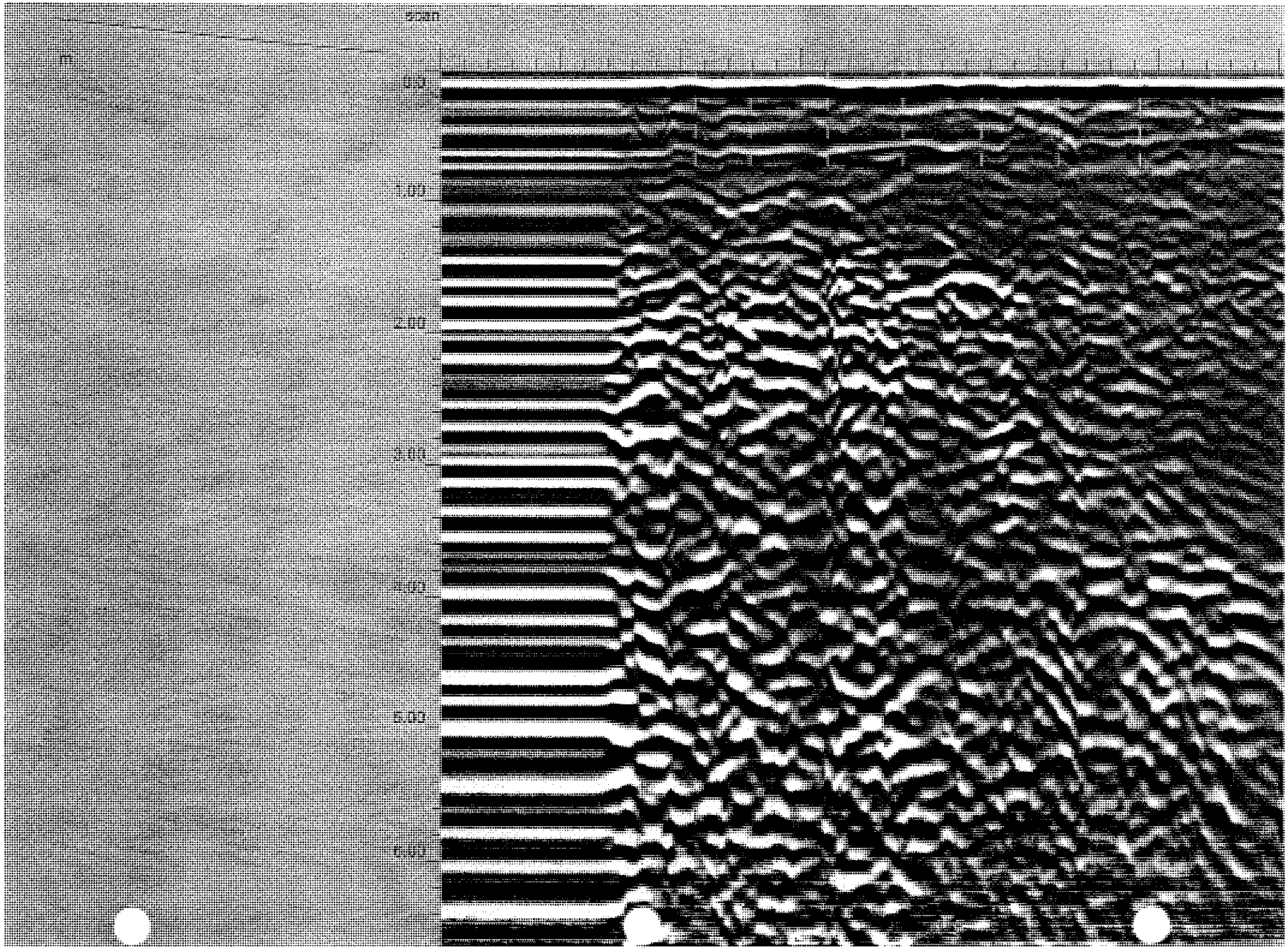

800
1000
1200
1400

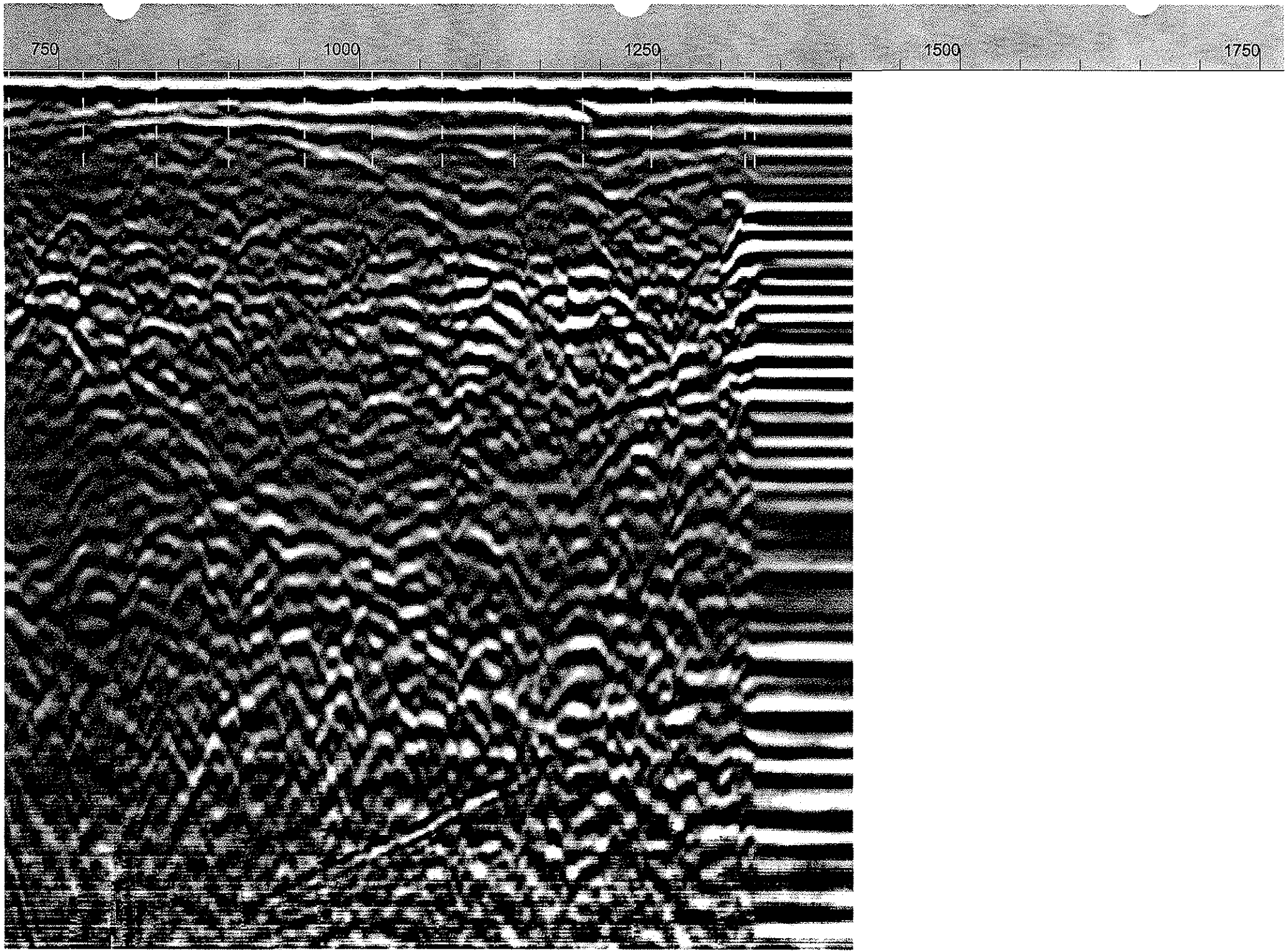
FIL .DZT

GE - Fletcher Paint
Elm Street Site
From K08 to N10 and 7 ft east of file 72 - surveyed from south to north.

Created Aug, 13 2003, 16:39:50 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) 3.0 37.0 43.0
64.0 74.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4

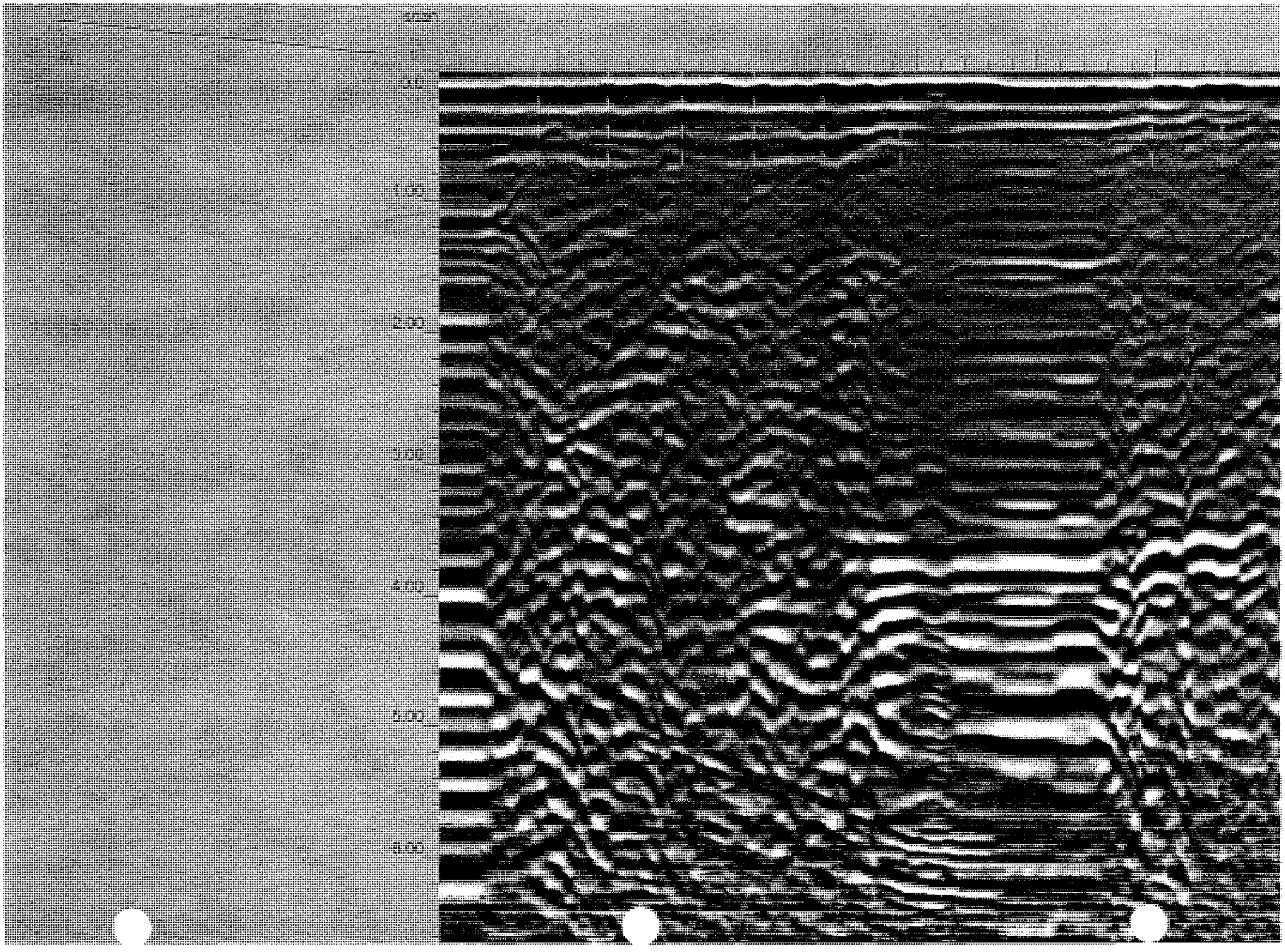

50m
m
0.0
1.00
2.00
3.00
4.00
5.00
6.00

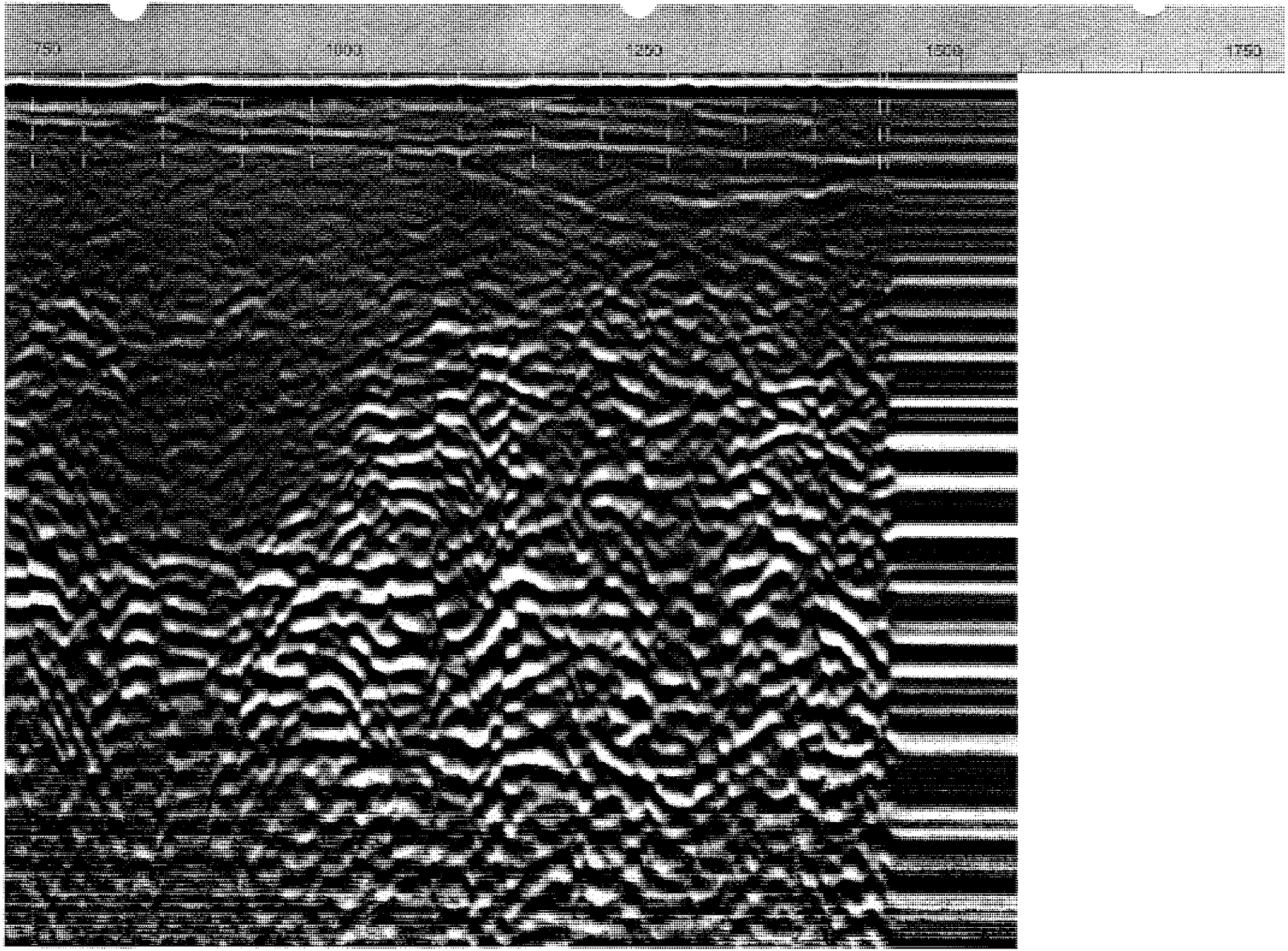

750
1000
1250
1500
1750

GE - Fletcher Paint
Elm Street Site
From K08 to N10 and 14 ft east of file 72 - surveyed from north to south.

Created Aug, 13 2003, 16:46:38 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 120 nS
Range Gain (dB) 5.0 33.0 53.0
71.0 79.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4


0.00
0.50
1.00
1.50
2.00
2.50
3.00
3.50
4.00
4.50

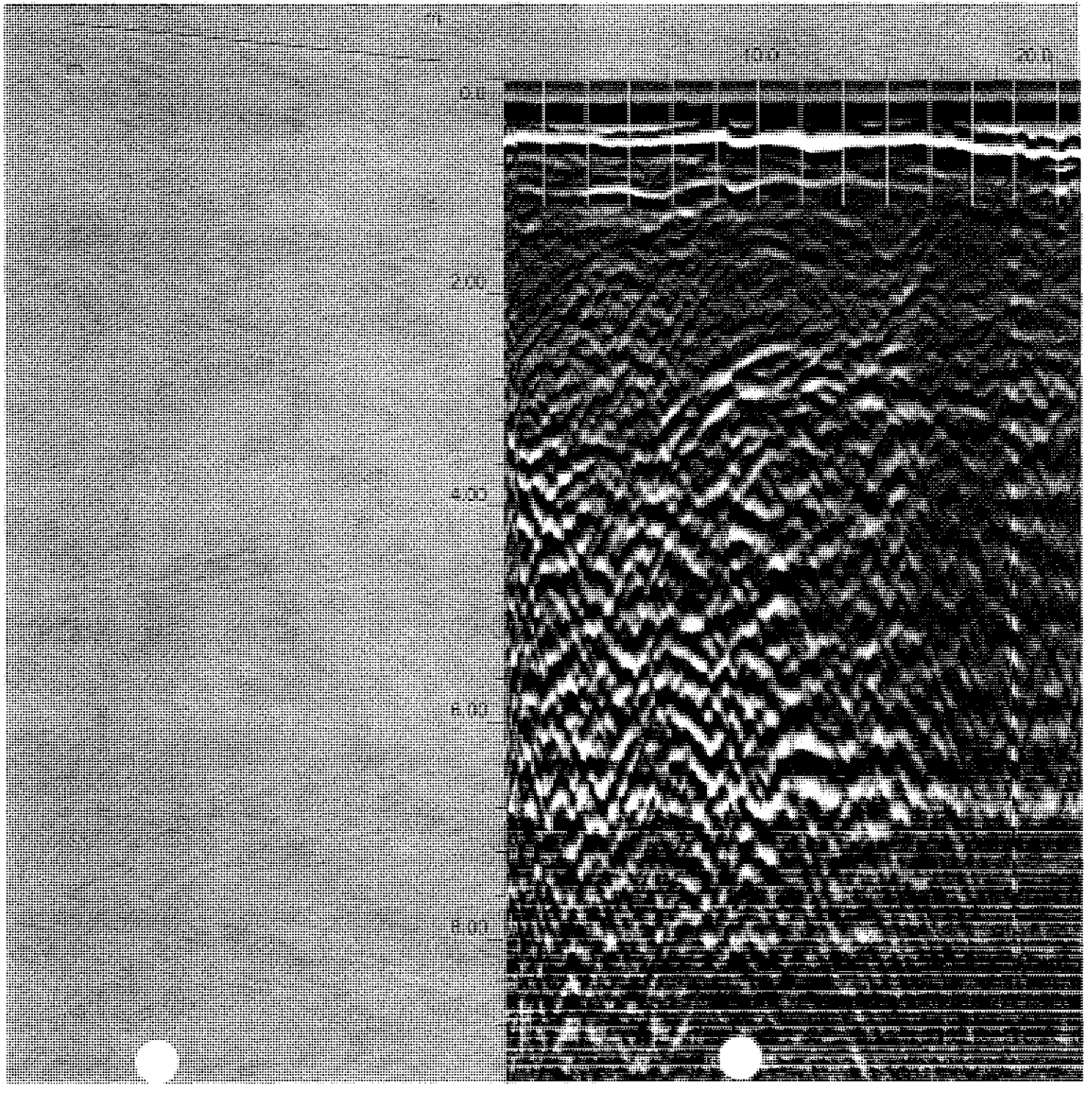

750
1000
1250
1500
1750

FIL DZT

GE - Fletcher Paint
Elm Street Site
Moved 4 ft south from file 76 location, survey from Grid Location O10 to O12 + 30 ft east.

Created Aug, 14 2003, 08:51:54 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 180 nS
Range Gain (dB) 7.0 37.0 70.0
80.0
Vert IIR LP N =1 F =710 MHz
Vert IIR HP N =2 F =40 MHz
Horz IIR Stack TC =3

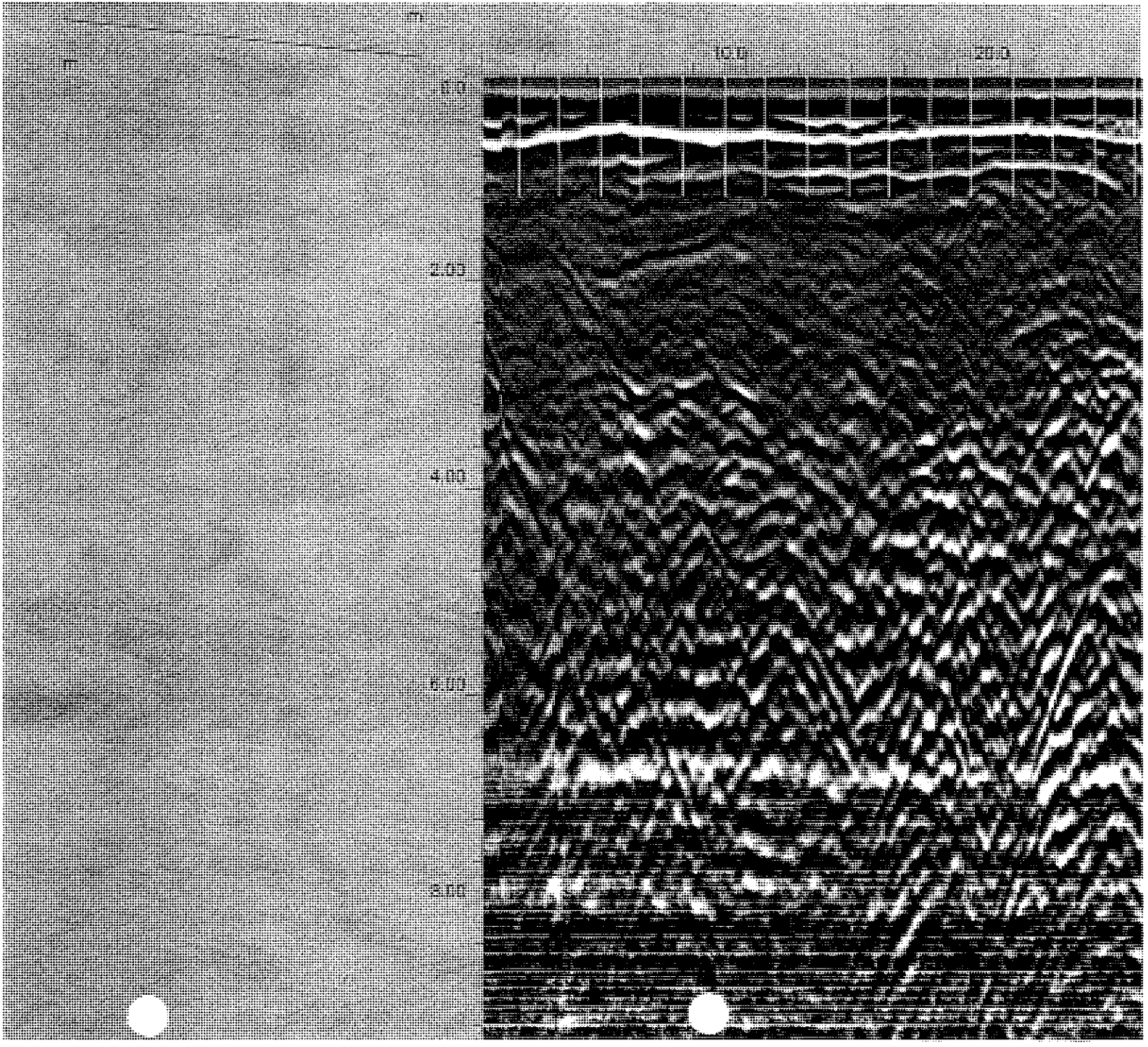

2.00
4.00
6.00
8.00

FIL DZT

GE - Fletcher Paint
Elm Street Site
From Grid Location O10 to O12 + 30 ft east.

Created Aug, 14 2003, 08:49:22 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 180 nS
Range Gain (dB) 7.0 37.0 70.0
80.0
Vert IIR LP N =1 F =710 MHz
Vert IIR HP N =2 F =40 MHz
Horz IIR Stack TC =3

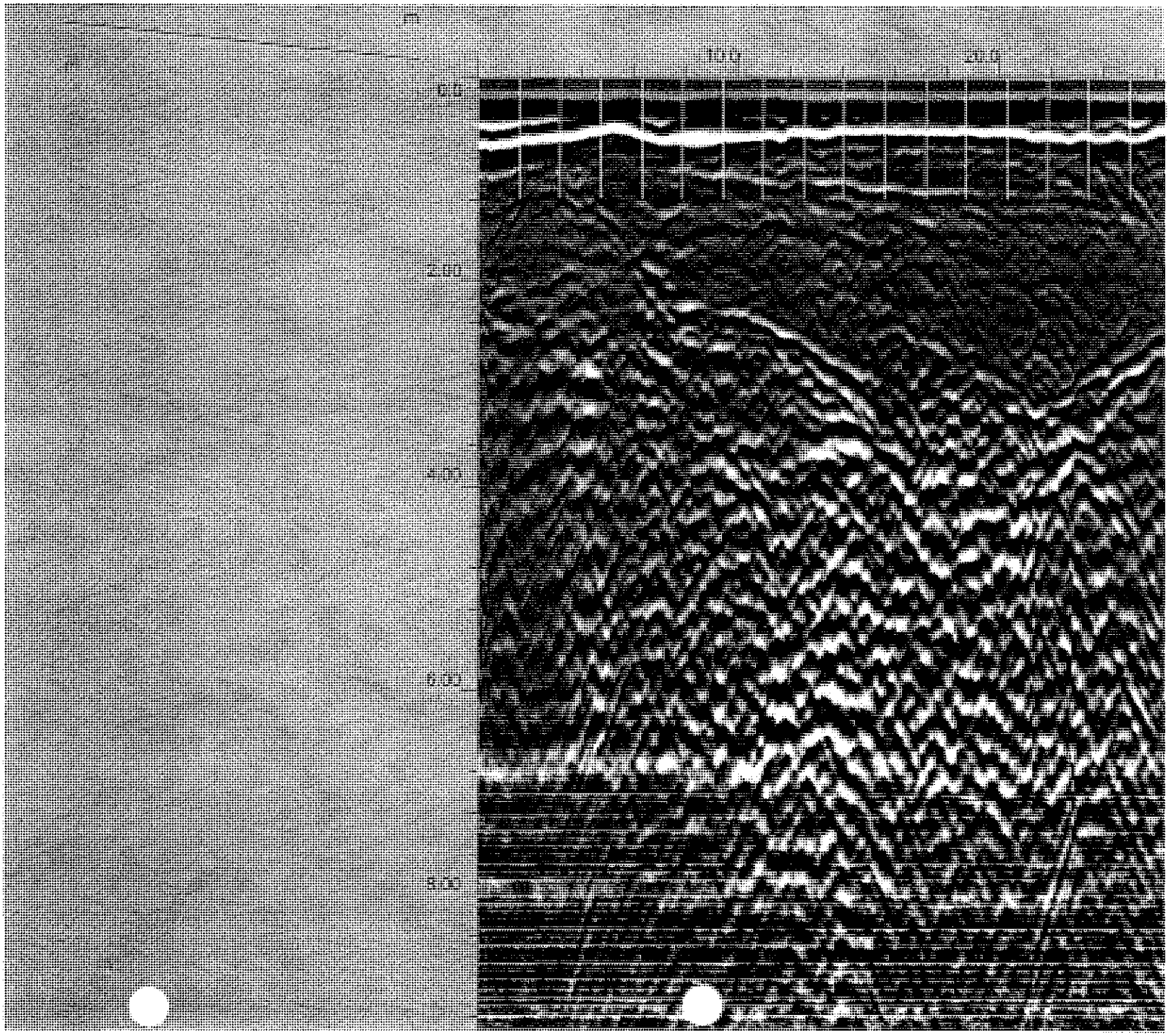

0.0
2.00
4.00
6.00
8.00
10.0
20.0

FIL DZT

GE - Fletcher Paint
Elm Street Site
Moved 9 ft south from file 76 location, surveyed from Grid Location O10 to O12 + 30 ft east.

Created Aug, 14 2003, 08:55:42 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

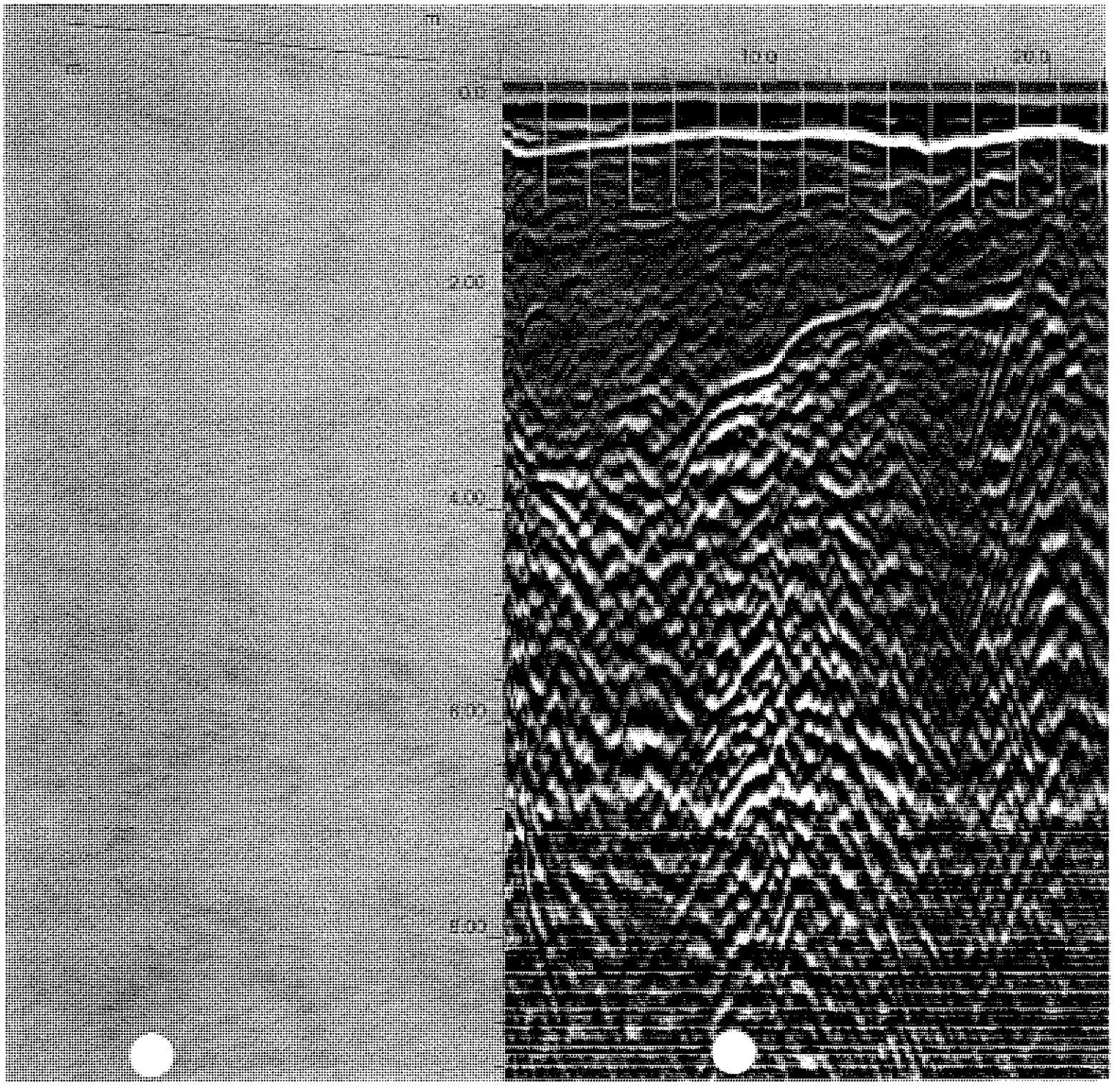
CHANNEL 1 200D
Position 0 nS Range 180 nS
Range Gain (dB) 7.0 37.0 70.0
80.0
Vert IIR LP N =1 F =710 MHz
Vert IIR HP N =2 F =40 MHz
Horz IIR Stack TC =3



GE - Fletcher Paint
Elm Street Site
Moved 14 south from file 76 location, surveyed from Grid Location O10 to O12 + 30 ft east.

Created Aug, 14 2003, 08:57:56 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

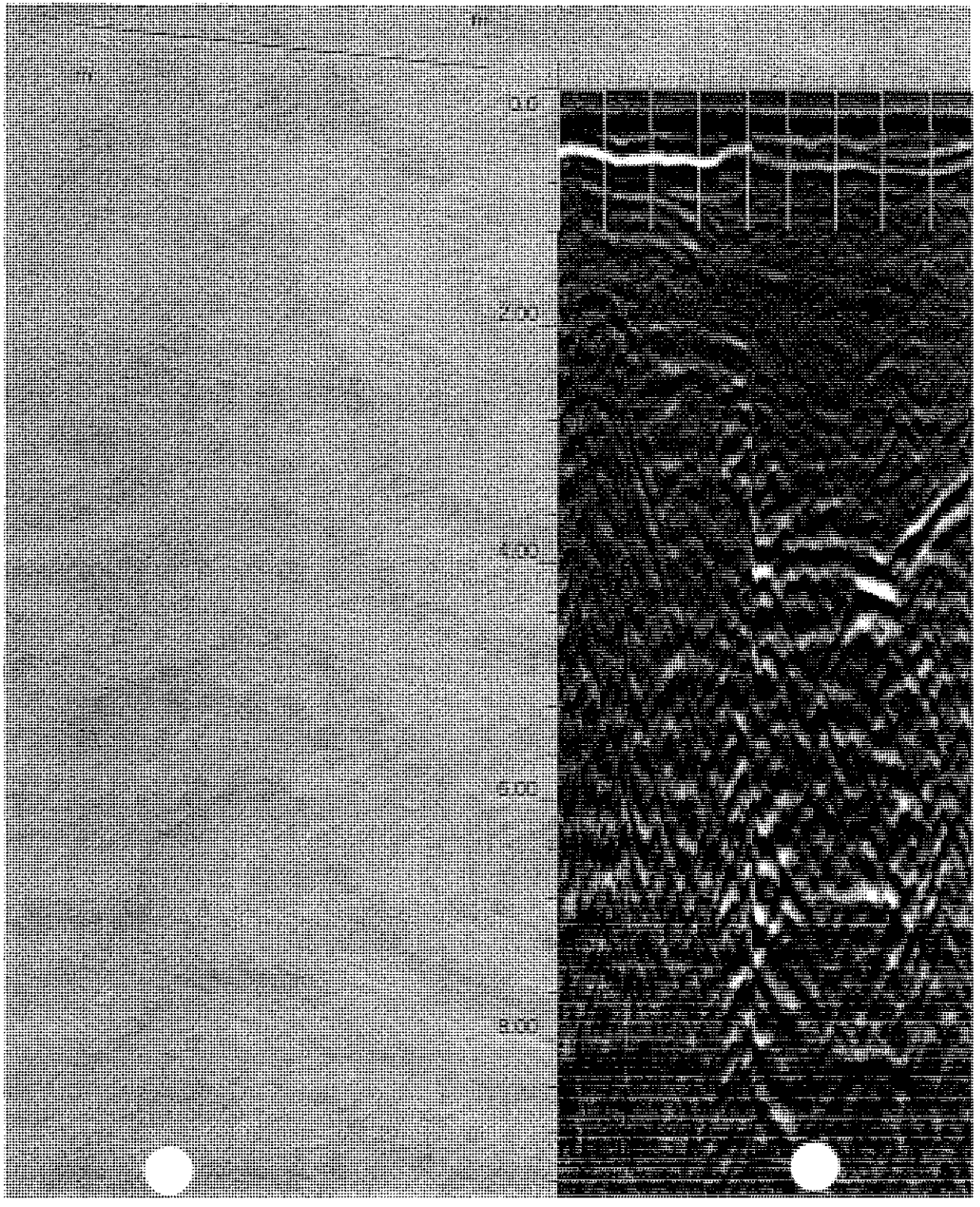
CHANNEL 1 200D
Position 0 nS Range 180 nS
Range Gain (dB) 7.0 37.0 70.0
80.0
Vert IIR LP N =1 F =710 MHz
Vert IIR HP N =2 F =40 MHz
Horz IIR Stack TC =3


100
200
300
400
500
600
700

GE - Fletcher Paint
Elm Street Site
Moved 19 ft south from file 76 location, surveyed from Grid Location O10 to O12 + 30 ft east.

Created Aug, 14 2003, 09:00:34 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

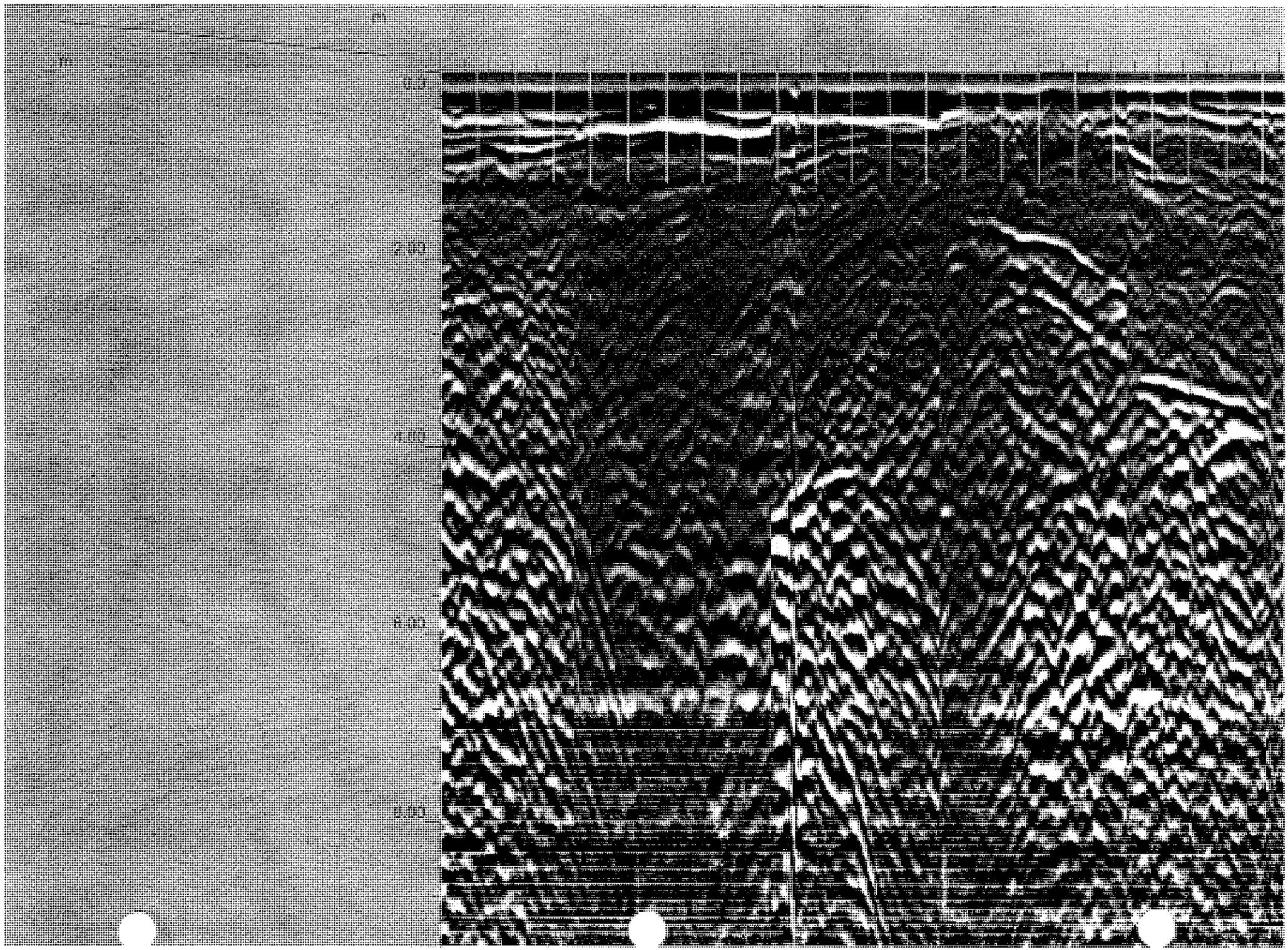
CHANNEL 1 200D
Position 0 nS Range 180 nS
Range Gain (dB) 7.0 37.0 70.0
80.0
Vert IIR LP N =1 F =710 MHz
Vert IIR HP N =2 F =40 MHz
Horz IIR Stack TC =3


0.0
2.5
5.0
7.5
10.0

GE - Fletcher Paint
Elm Street Site
From Grid Location N10 to N16.

Created Aug, 14 2003, 09:03:24 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 180 nS
Range Gain (dB) 7.0 37.0 70.0
80.0
Vert IIR LP N =1 F =710 MHz
Vert IIR HP N =2 F =40 MHz
Horz IIR Stack TC =3

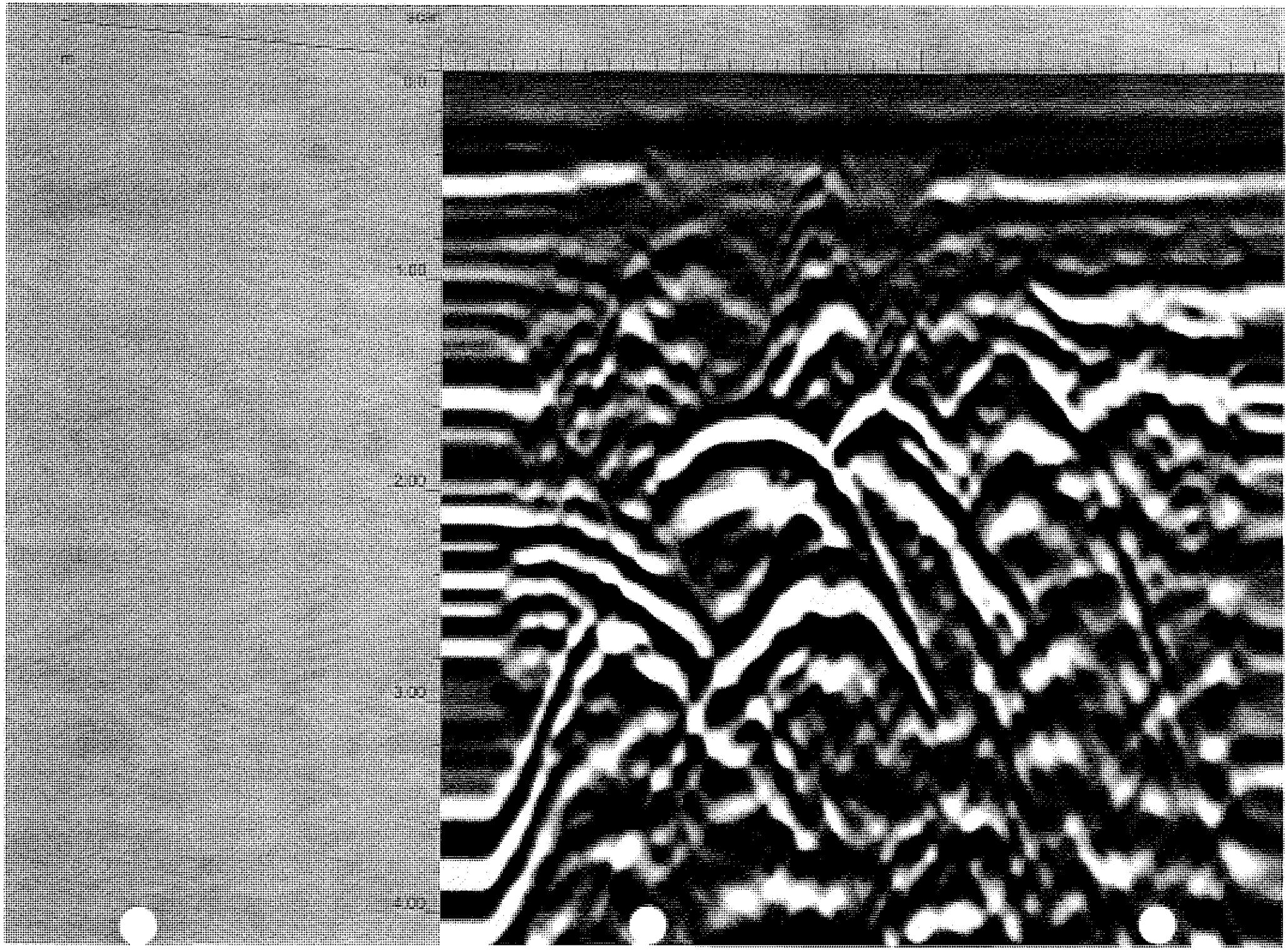

0.0
2.00
4.00
6.00
8.00

FIL DZT

GE - Fletcher Paint
Elm Street Site
From Grid Location O14 to M14 - over USTs located near N14.

Created Aug, 14 2003, 09:11:32 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) 3.0 36.0 44.0
56.0
Vert IIR LP N =1 F =610 MHz
Vert IIR HP N =2 F =35 MHz
Horz IIR Stack TC =3

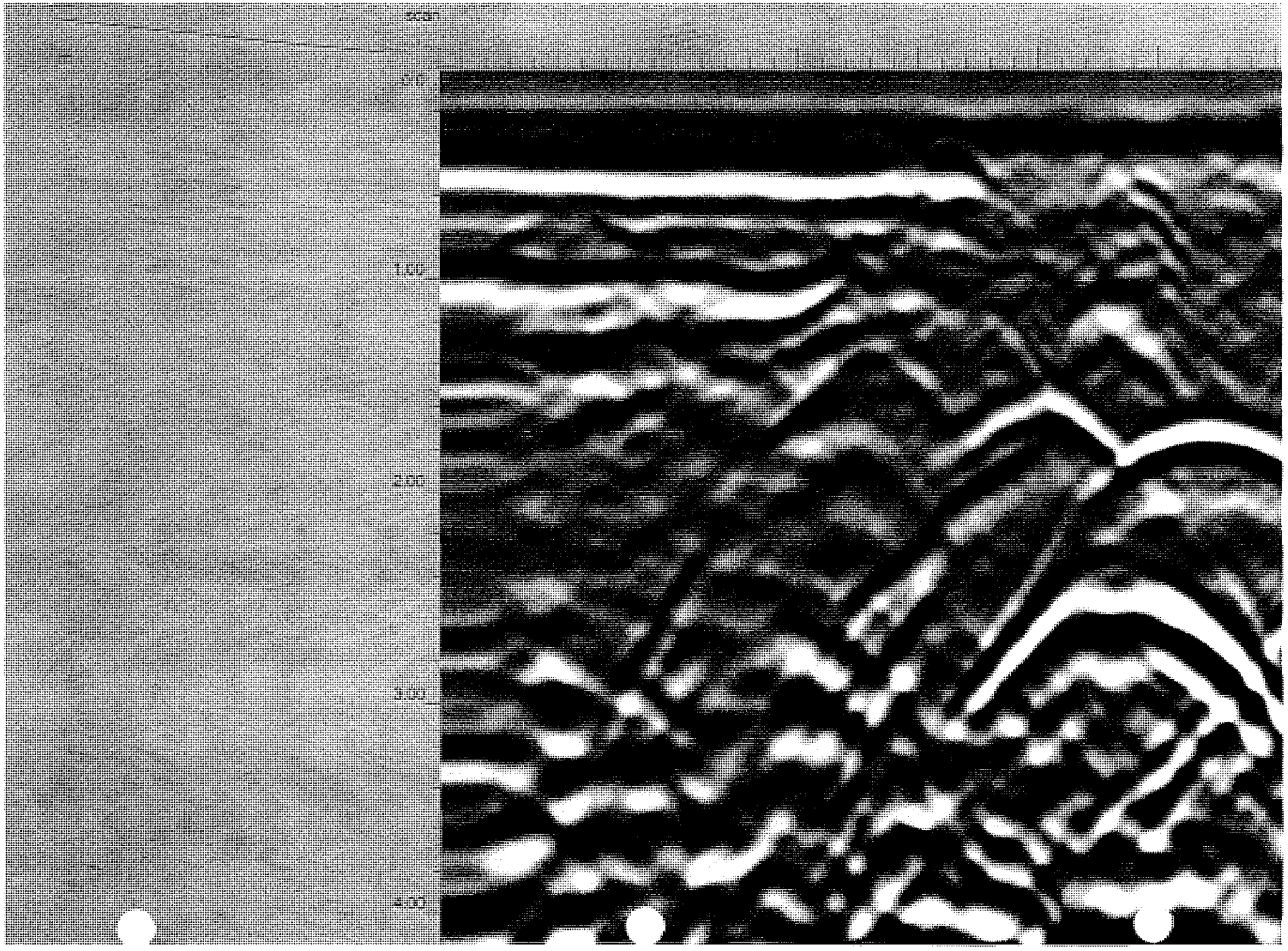

0.00
1.00
2.00
3.00
4.00

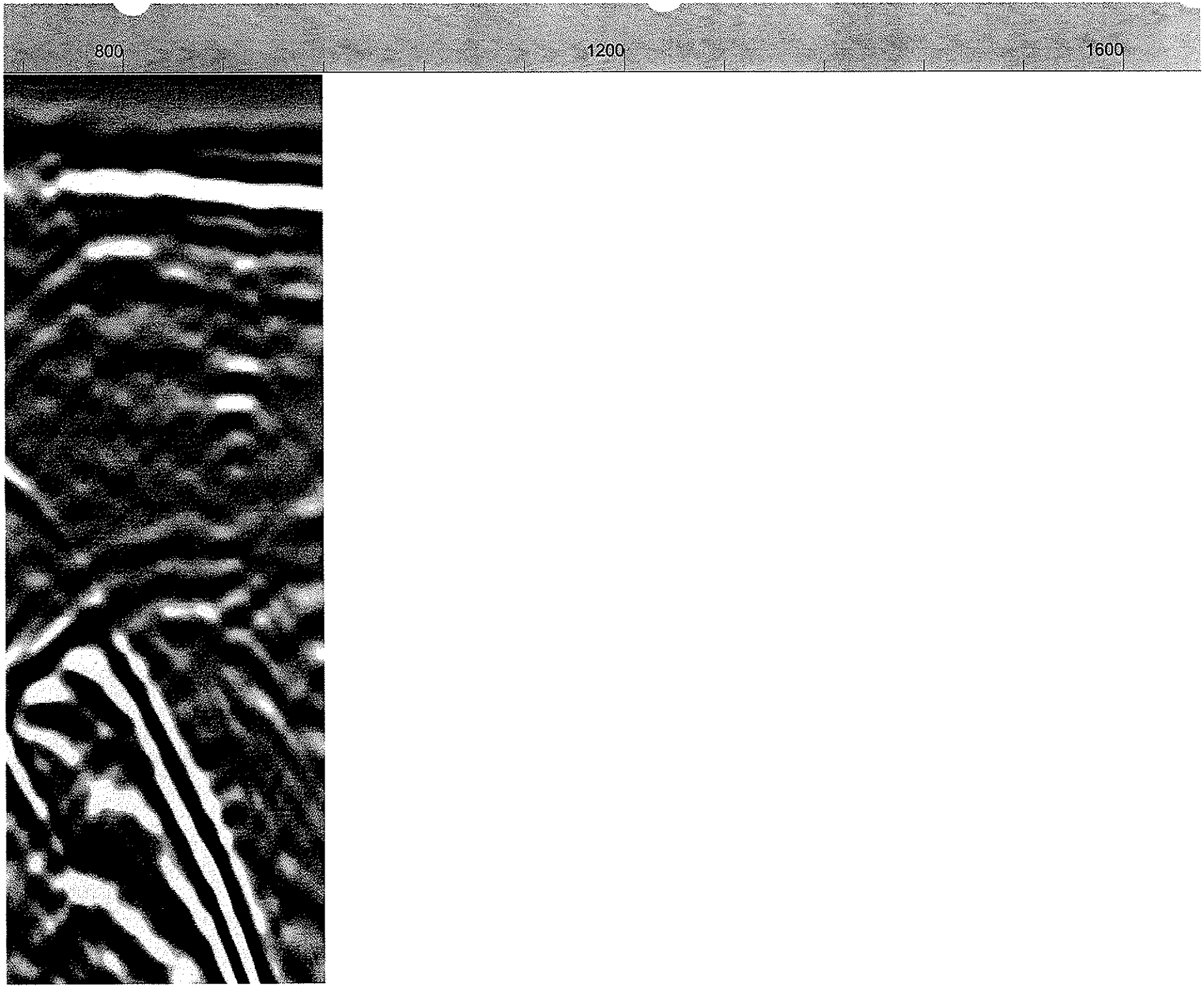
800
1000
1200
1400

GE - Fletcher Paint
Elm Street Site
From Grid Location M14 to O14 - over USTs.

Created Aug, 14 2003, 09:15:10 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) 2.0 23.0 38.0
52.0
Vert IIR LP N =1 F =610 MHz
Vert IIR HP N =2 F =35 MHz
Horz IIR Stack TC =3


500
1.00
1.50
2.00
2.50
3.00
3.50
4.00

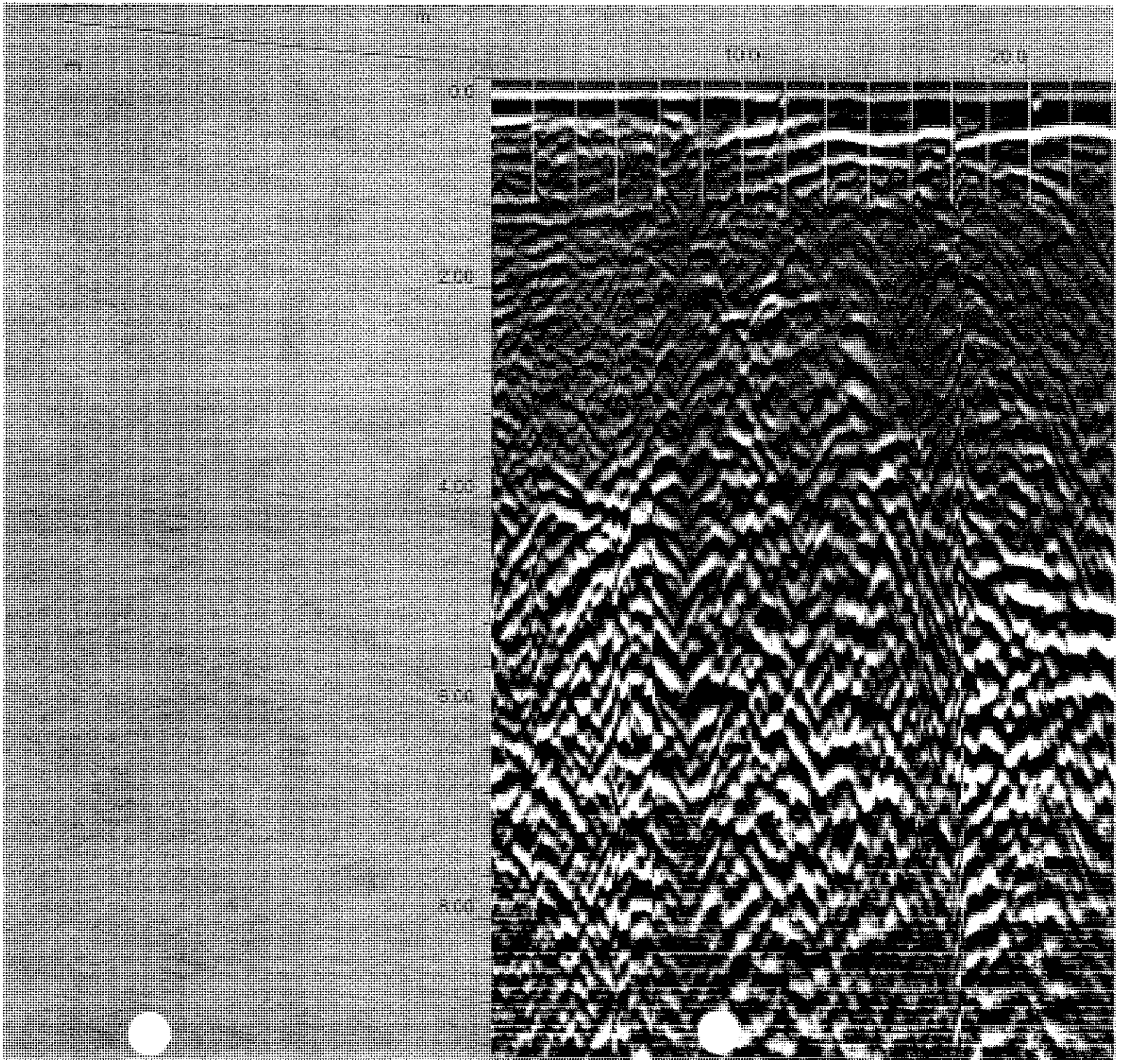

800
1200
1600

FIL .DZT

GE - Fletcher Paint
Elm Street Site
Moved 5 ft north, surveyed from Grid Location N16 to N12.

Created Aug, 14 2003, 09:05:58 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 1.524
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 180 nS
Range Gain (dB) 7.0 37.0 70.0
80.0
Vert IIR LP N =1 F =710 MHz
Vert IIR HP N =2 F =40 MHz
Horz IIR Stack TC =3

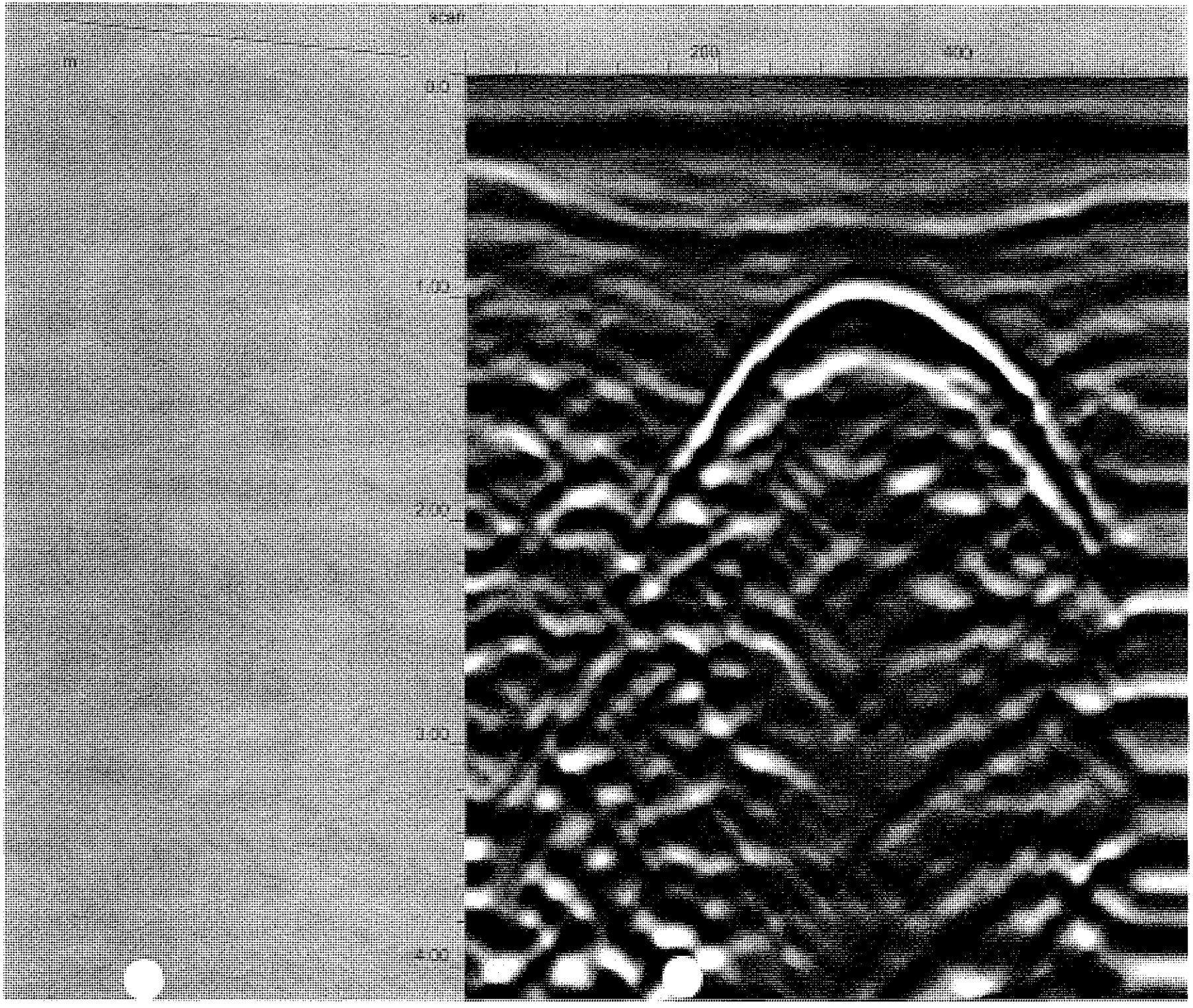

m
0.0
10.0
20.0
0.0
2.00
4.00
6.00
8.00

FIL' DZT

GE - Fletcher Paint
Elm Street Site
UST area located approximately 20 ft north of Grid Location M12.

Created Jul, 31 2003, 14:44:32 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) 3.0 36.0 44.0
56.0
Vert IIR LP N =1 F =610 MHz
Vert IIR HP N =2 F =35 MHz
Horz IIR Stack TC =3

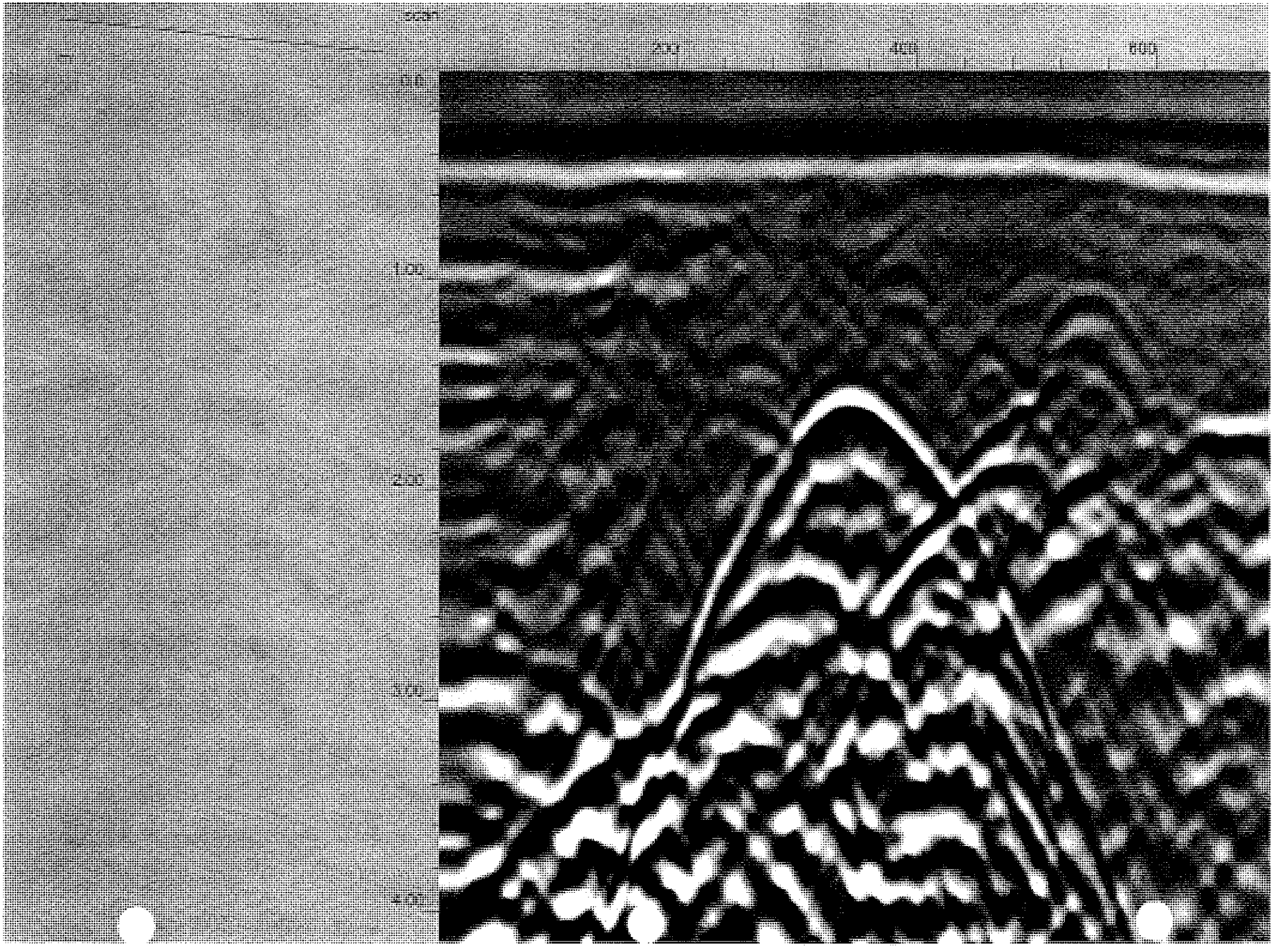

0
100
200
300
400
200
300

FIL DZT

GE - Fletcher Paint
Elm Street Site
UST area located between Grid Location M14 and O14.

Created Jul, 31 2003, 14:57:40 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) 0.0 25.0 47.0
64.0
Vert IIR LP N =1 F =610 MHz
Vert IIR HP N =2 F =35 MHz
Horz IIR Stack TC =3

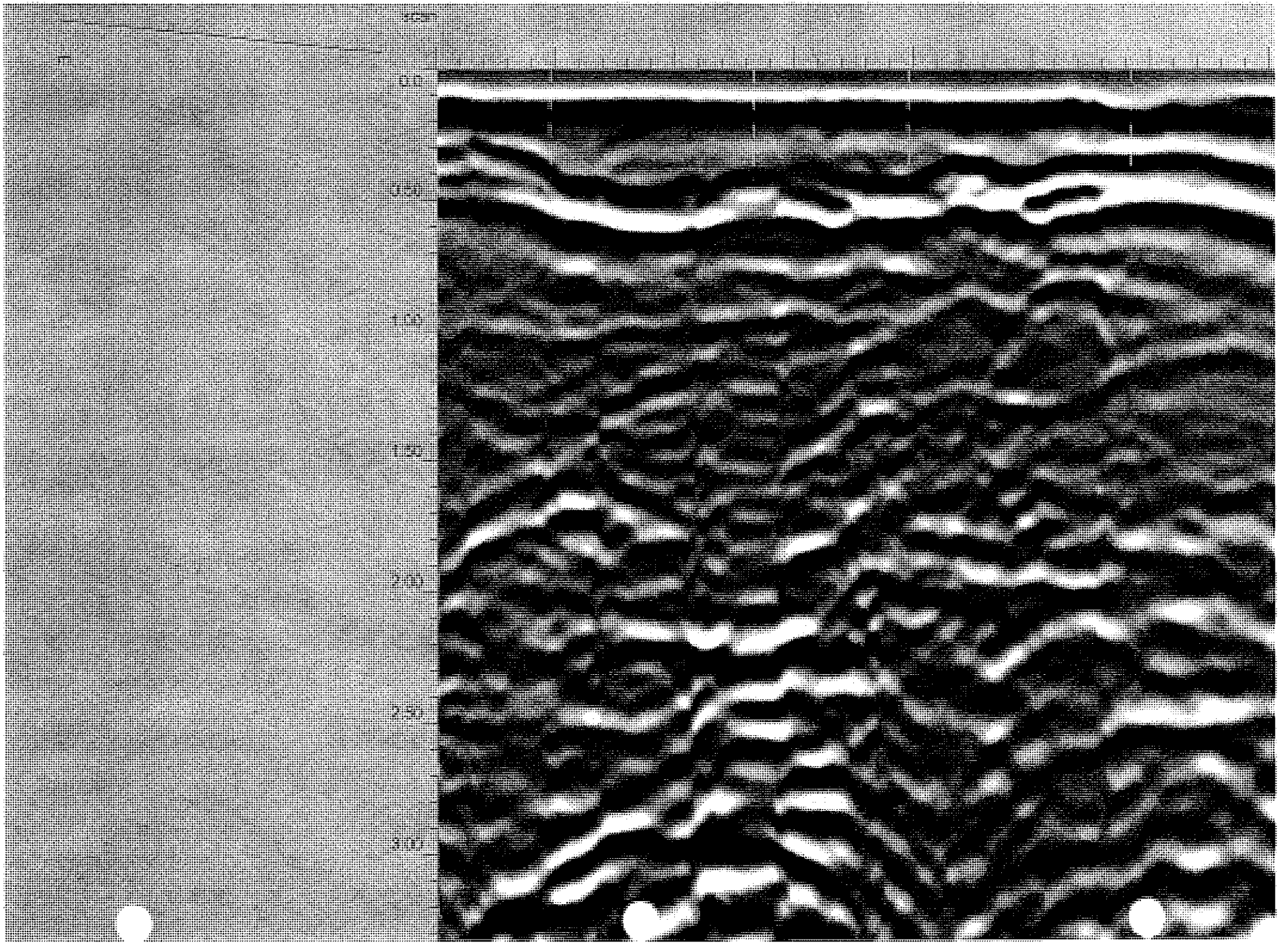


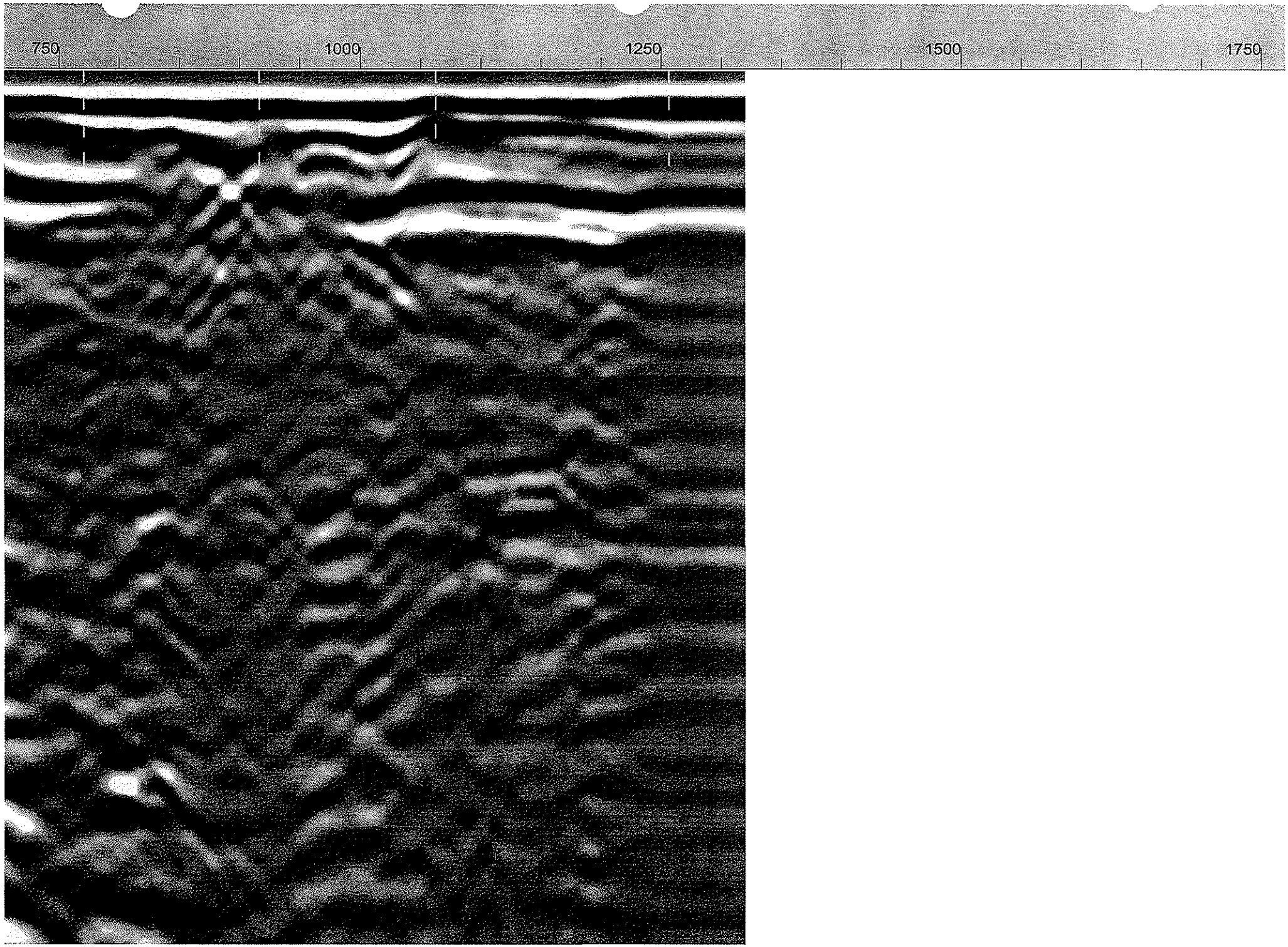
FIL DZT

GE - Fletcher Paint
Elm Street Site
Depression area at fence corner near Grid Location P-12

Created Aug, 13 2003, 13:41:34 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 7

CHANNEL 1 400S
Position 0 nS Range 60 nS
Range Gain (dB) 4.0 23.0 37.0
43.0 57.0
Vert IIR LP N =1 F =800 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =4

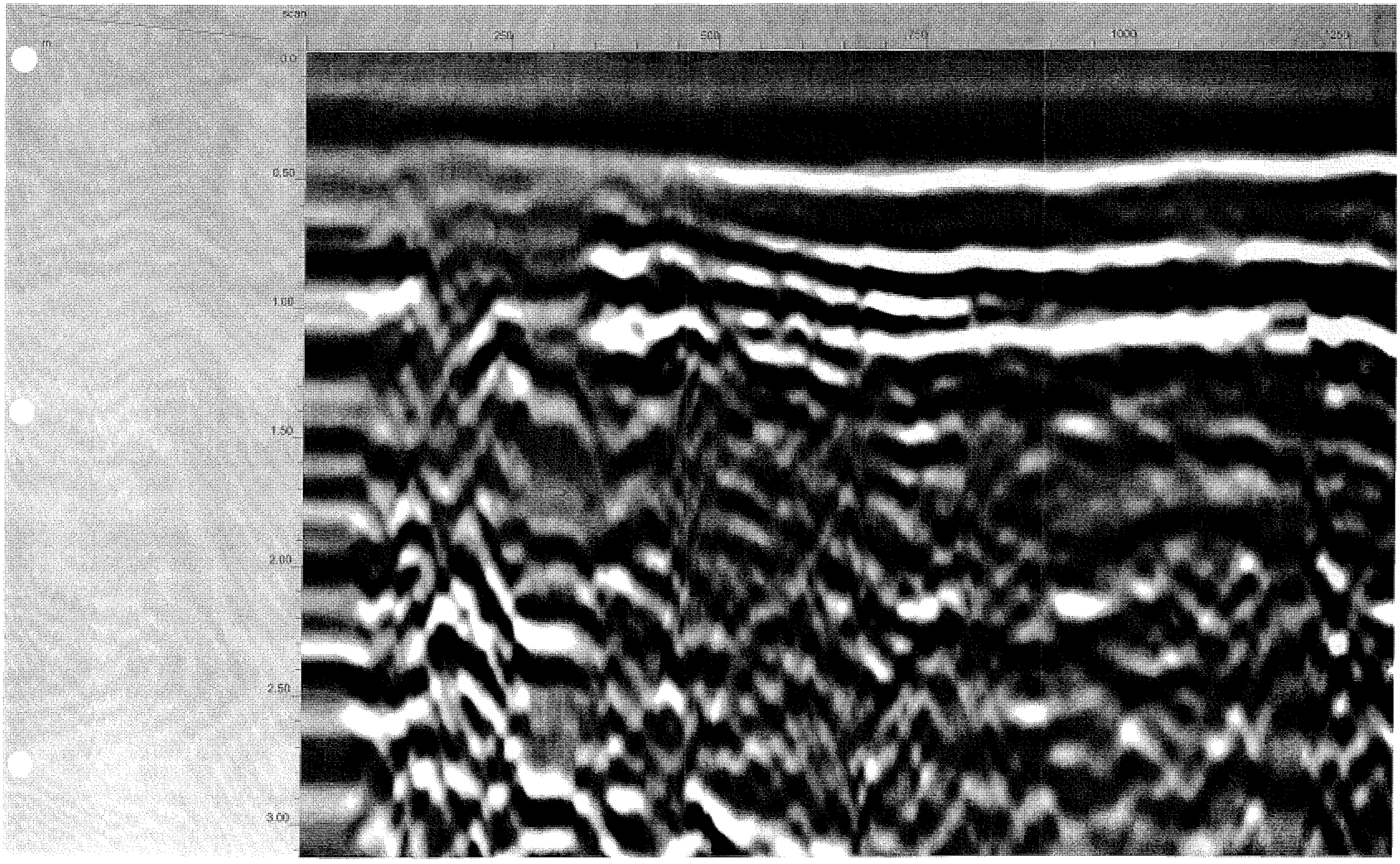

0.0
0.50
1.00
1.50
2.00
2.50
3.00

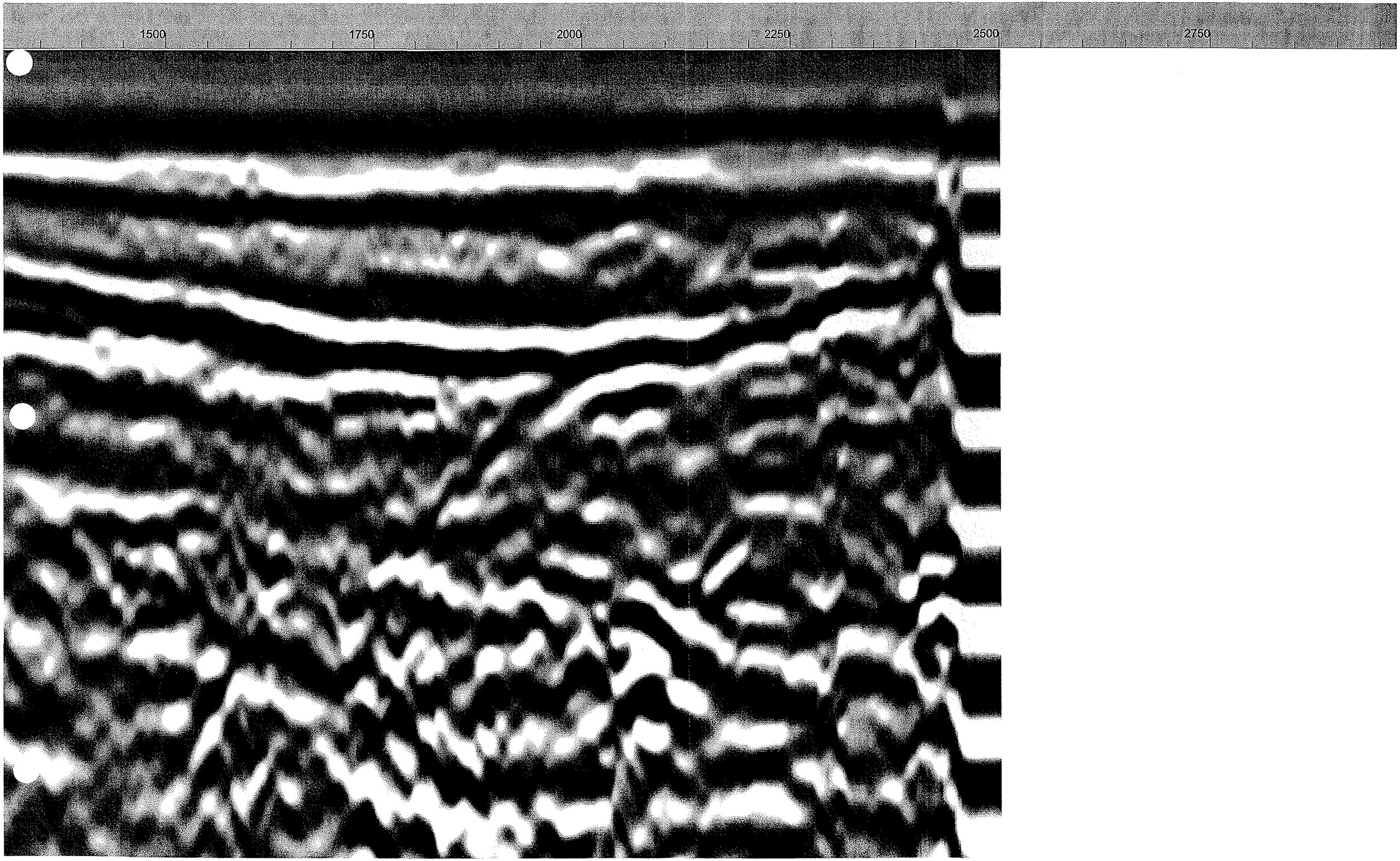

750
1000
1250
1500
1750

GE - Fletcher Paint
Elm Street Site
F grid location M14 + 10 ft north to L18 + 5 ft east ; evaluation of subsurface pipes.

Created Jul, 31 2003, 15:57:42 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 60 nS
Range Gain (dB) -6.0 23.0 38.0
47.0
Vert IIR LP N =1 F =665 MHz
Vert IIR HP N =2 F =40 MHz
Horz IIR Stack TC =3

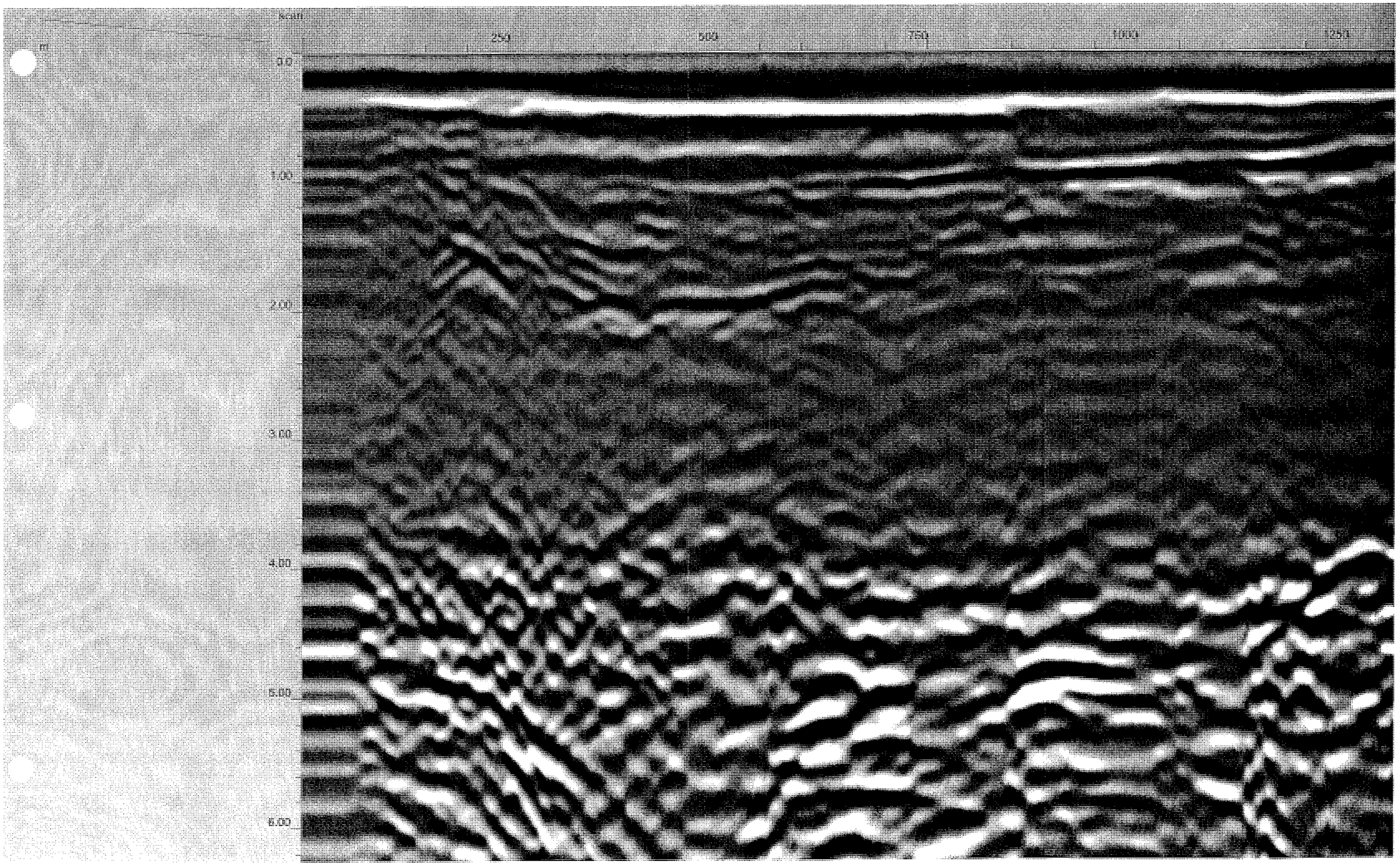

m
0.00
0.50
1.00
1.50
2.00
2.50
3.00
250
500
750
1000
1250

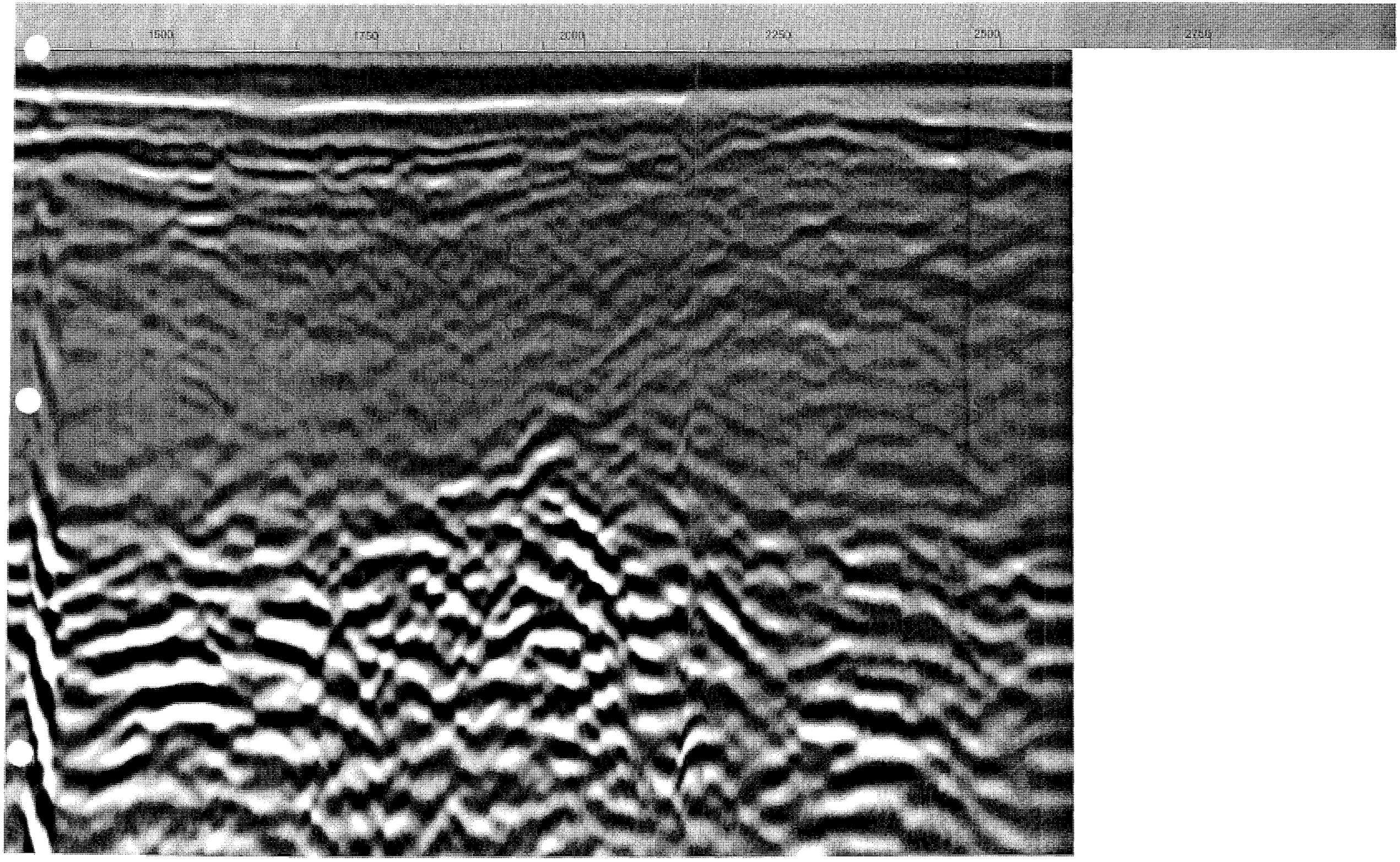

1500
1750
2000
2250
2500
2750

GE - Fletcher Paint
El~ Street Site
F\ grid location L18 + 5 ft east to M14 + 5 ft north ; evaluation of subsurface pipes.

Created Jul, 31 2003, 16:03:14 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 120 nS
Range Gain (dB) 2.0 23.0 56.0
63.0
Vert IIR LP N =1 F =710 MHz
Vert IIR HP N =2 F =40 MHz
Horz IIR Stack TC =3

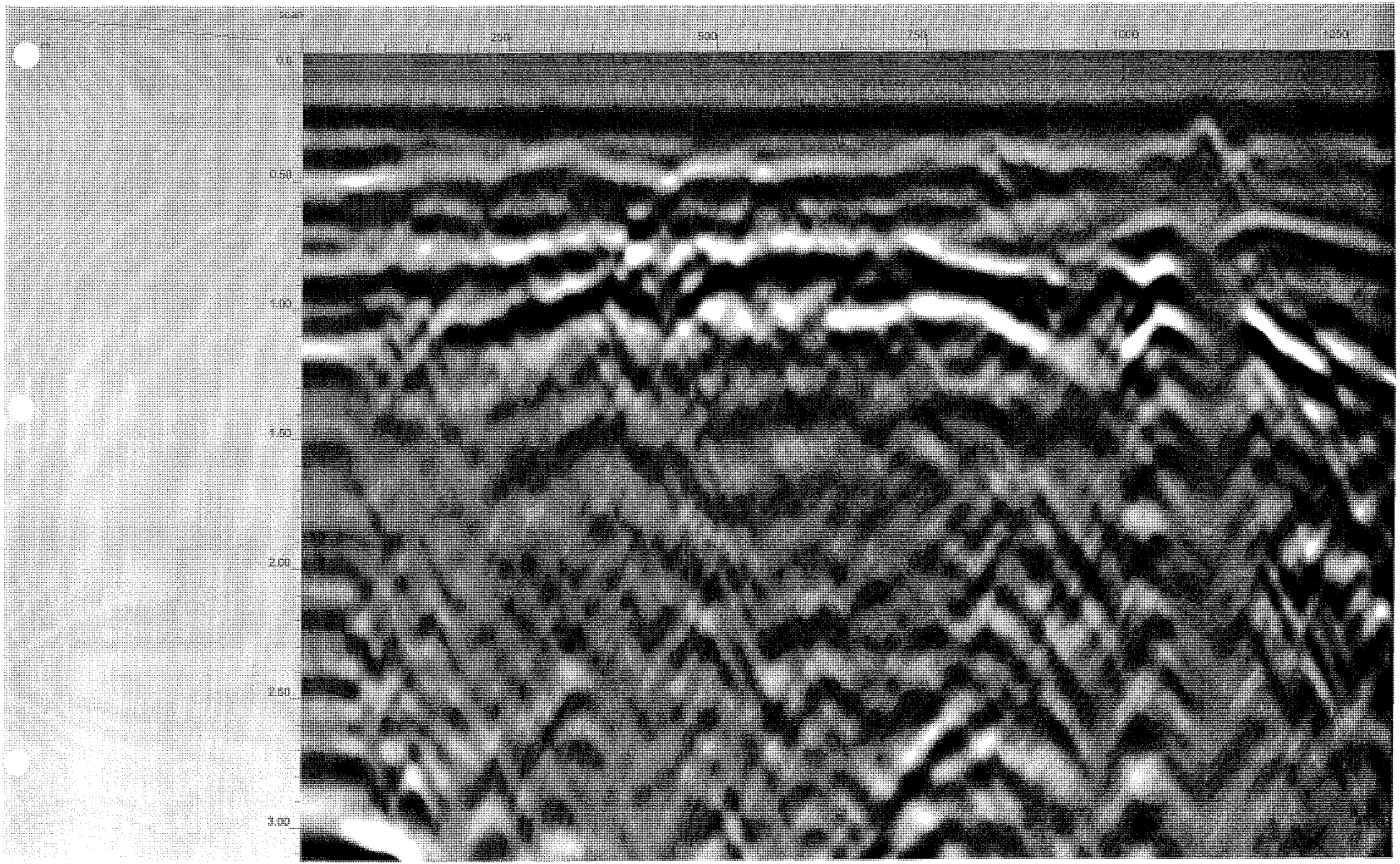

0.00
1.00
2.00
3.00
4.00
5.00
6.00

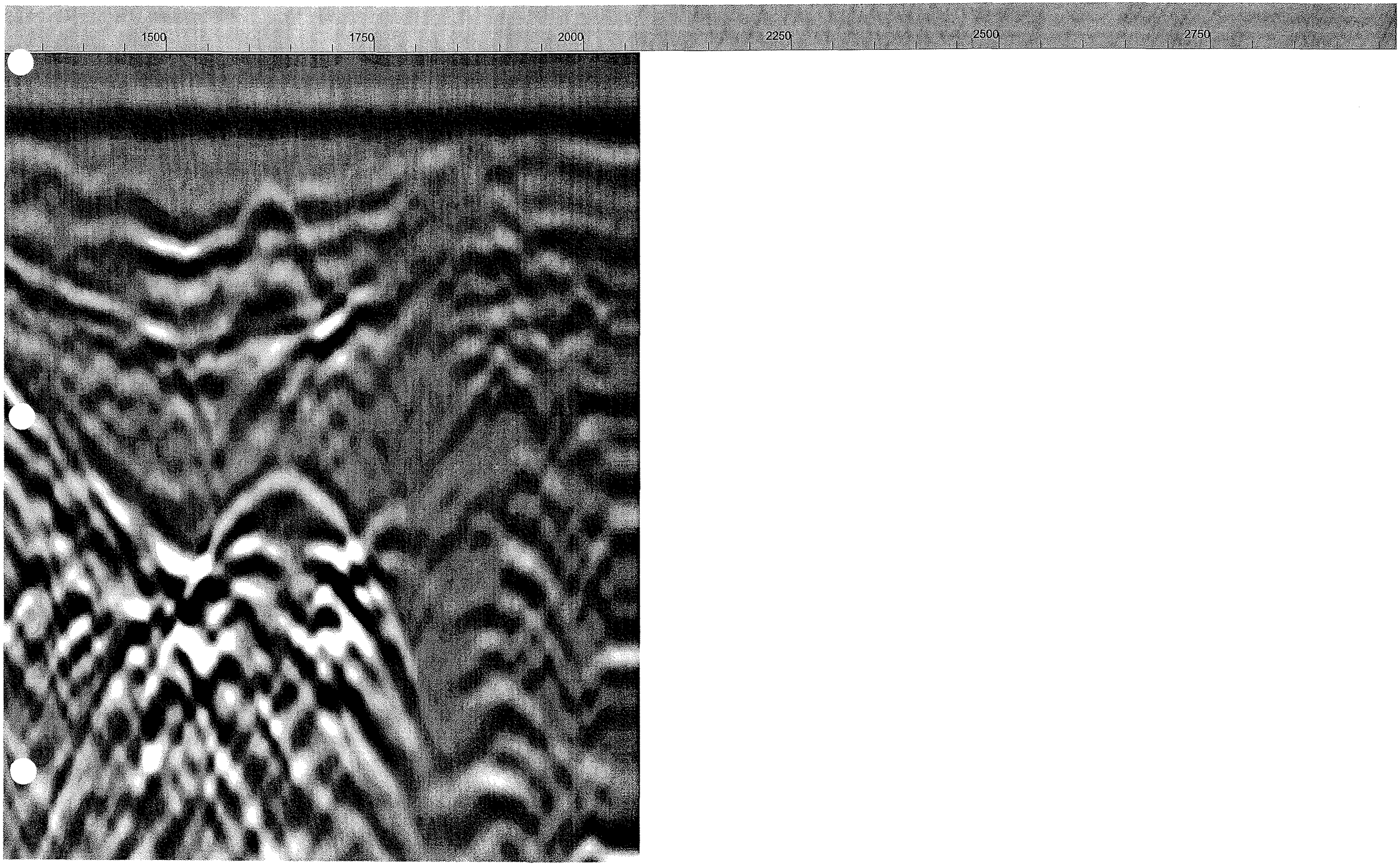

1500
1750
2000
2250
2500
2750

GE - Fletcher Paint
Elm Street Site
F grid location Q14 to Q17 + 10 ft ; evaluation of subsurface pipes.

Created Jul, 31 2003, 15:16:38 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 60 nS
Range Gain (dB) -6.0 23.0 38.0
47.0
Vert IIR LP N =1 F =665 MHz
Vert IIR HP N =2 F =40 MHz
Horz IIR Stack TC =3

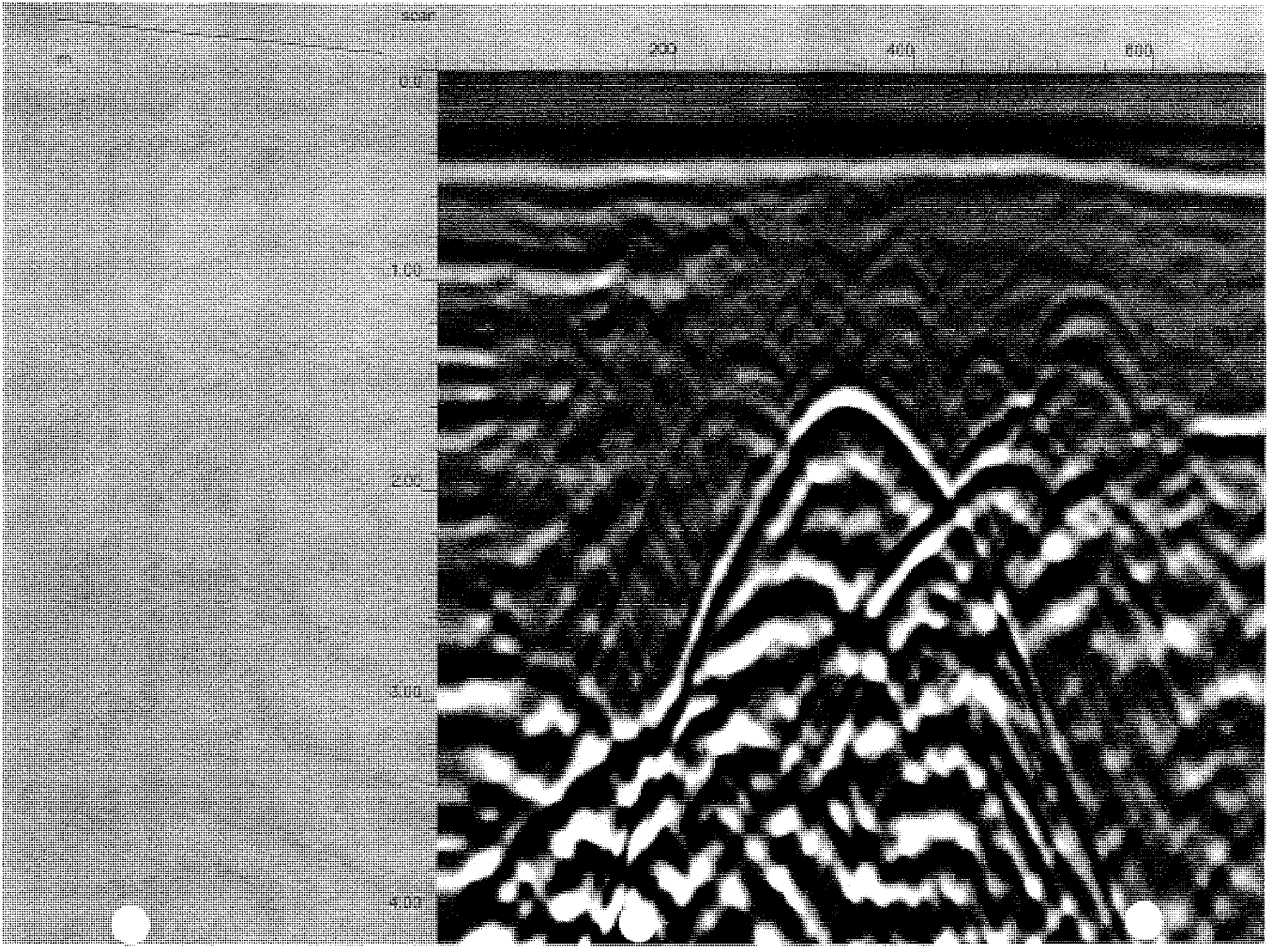

250
500
750
1000
1250
0.0
0.50
1.00
1.50
2.00
2.50
3.00


1500
1750
2000
2250
2500
2750

GE - Fletcher Paint
Elm Street Site
UST area located between Grid Location M14 and O14.

Created Jul, 31 2003, 14:57:40 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

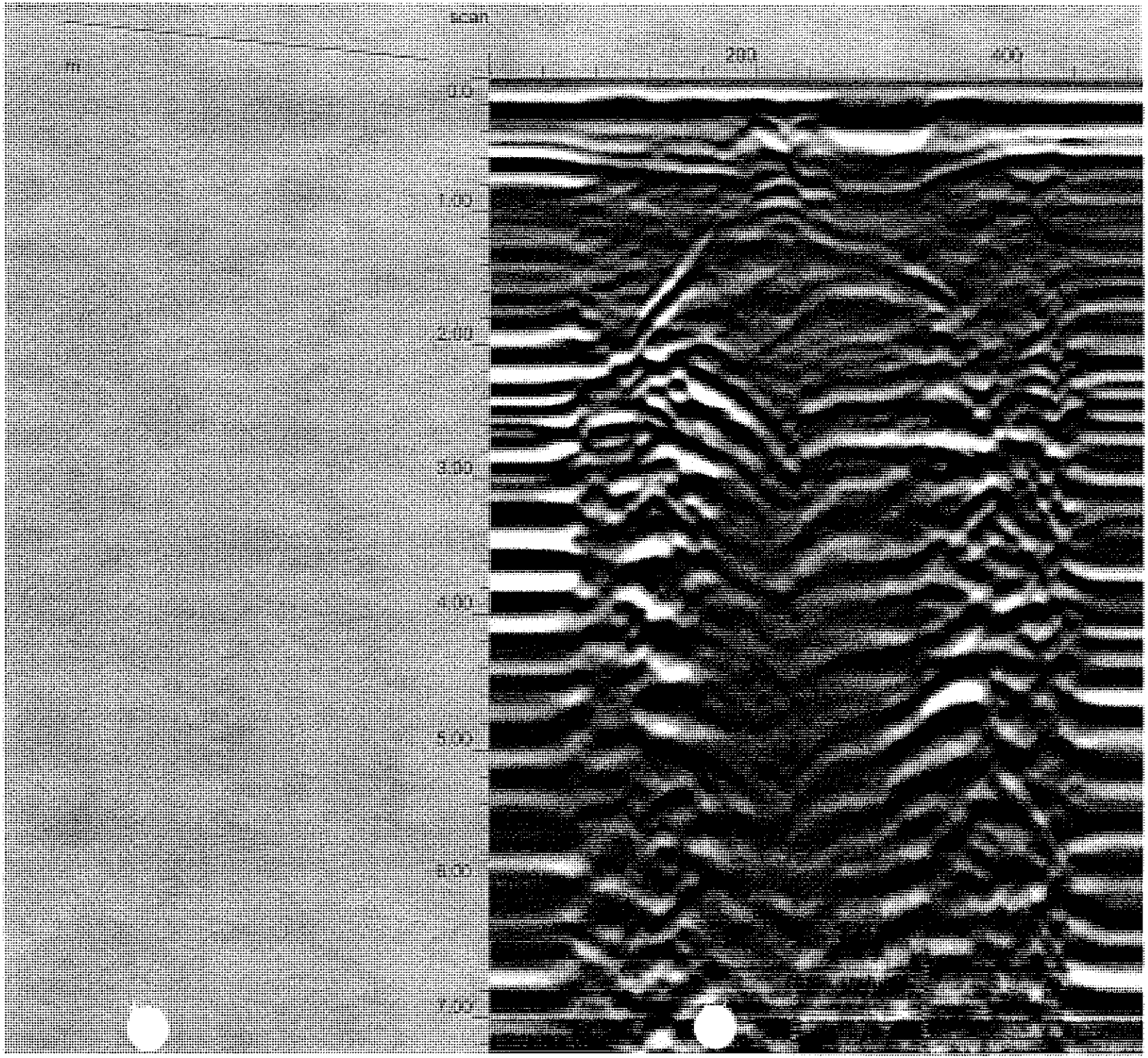
CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) 0.0 25.0 47.0
64.0
Vert IIR LP N =1 F =610 MHz
Vert IIR HP N =2 F =35 MHz
Horz IIR Stack TC =3


200
400
600
0.0
1.00
2.00
3.00
4.00

GE - Fletcher Paint
Elm Street Site
UST area located approximately 20 ft north of Grid Location M12.

Created Jul, 31 2003, 14:38:10 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

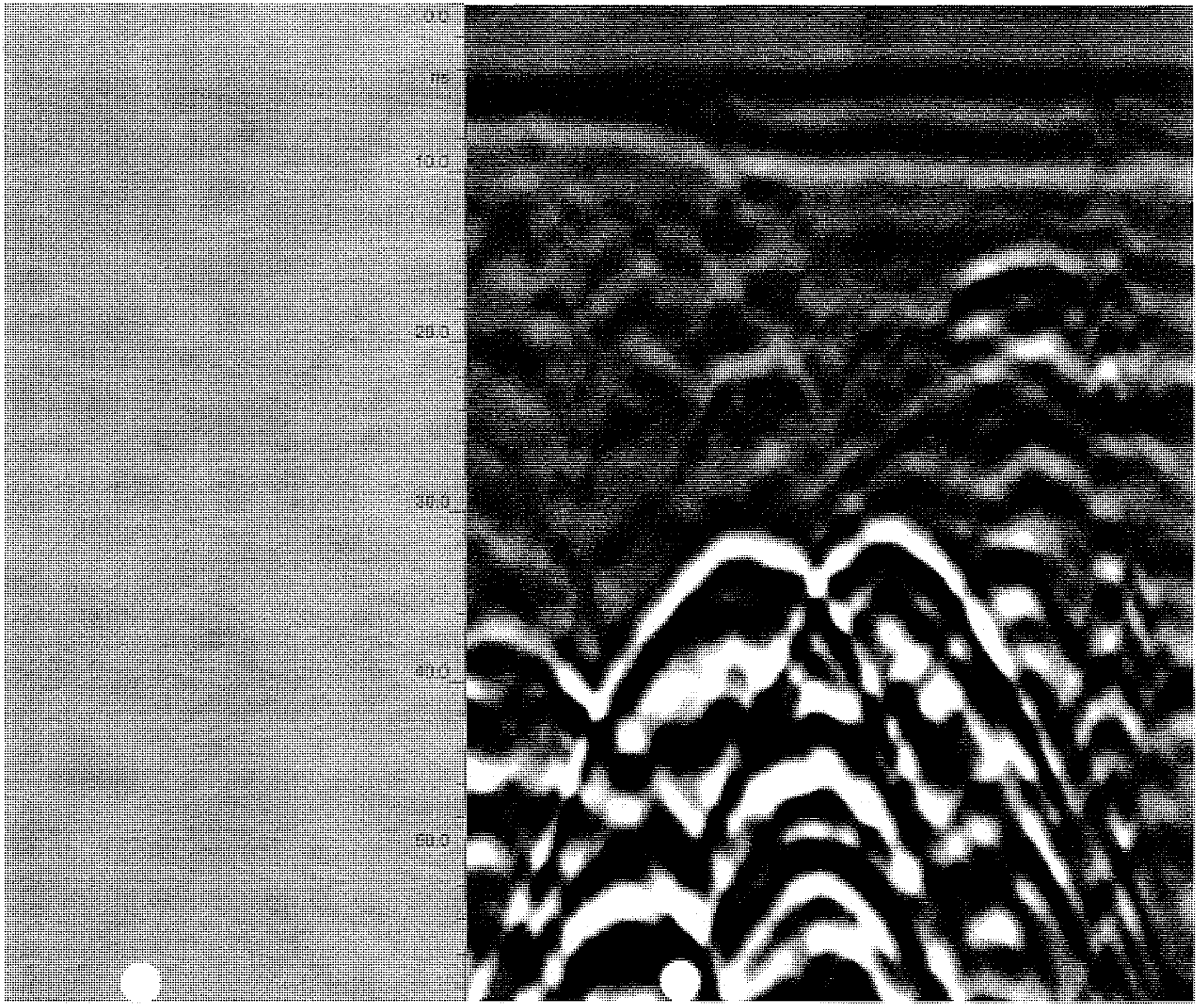
CHANNEL 1 200D
Position 0 nS Range 140 nS
Range Gain (dB) 8.0 42.0 52.0
77.0
Vert IIR LP N =1 F =770 MHz
Vert IIR HP N =2 F =45 MHz
Horz IIR Stack TC =3


scan
200
400
1.00
2.00
3.00
4.00
5.00
6.00
7.00

GE - Fletcher Paint
Elm Street Site
UST area located at Grid Location N14.

Created Jul, 31 2003, 15:02:54 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 60 nS
Range Gain (dB) -6.0 23.0 38.0
47.0
Vert IIR LP N =1 F =665 MHz
Vert IIR HP N =2 F =40 MHz
Horz IIR Stack TC =3

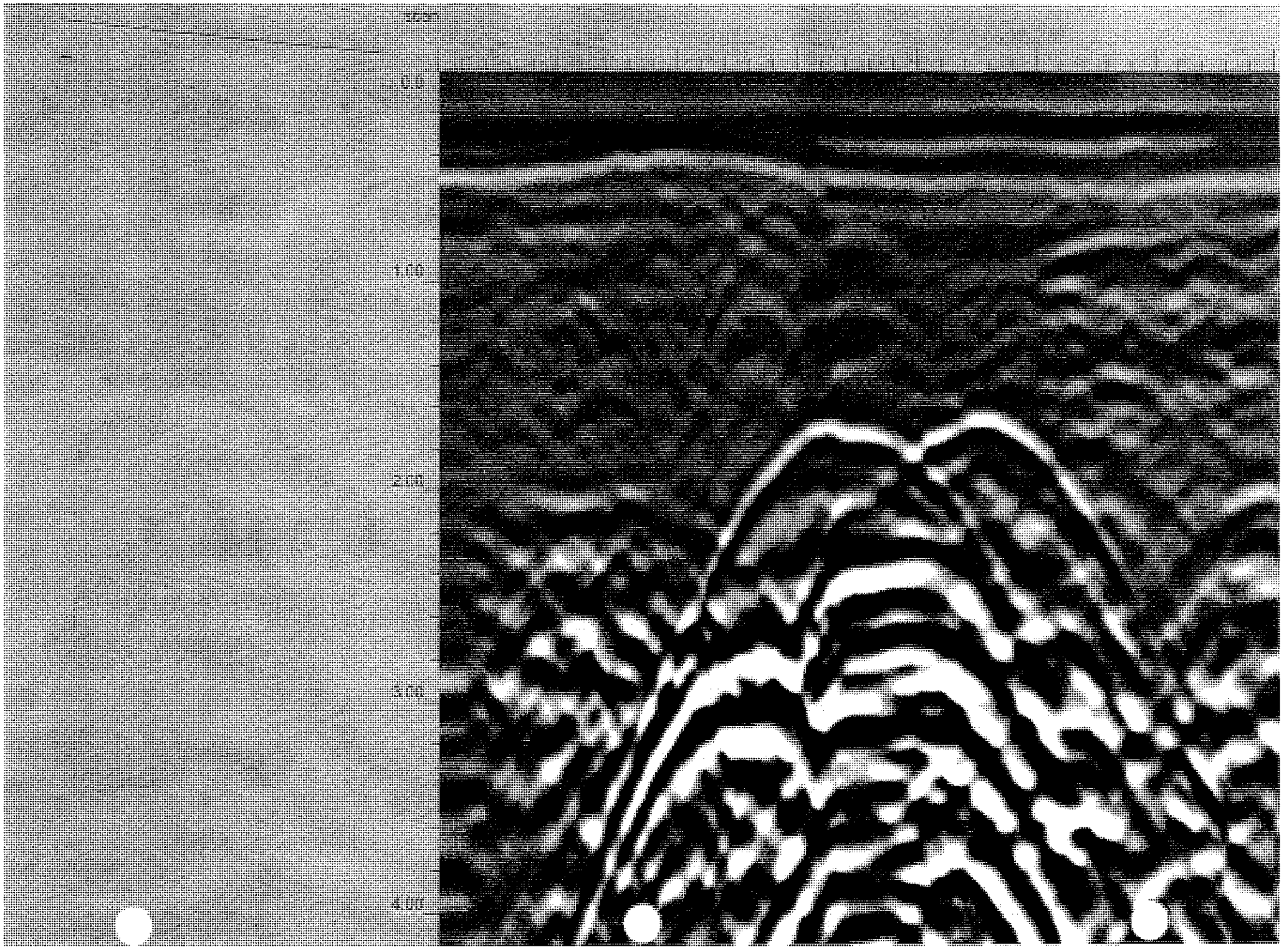

0.0
5.0
10.0
20.0
30.0
40.0
50.0

FIL .DZT

GE - Fletcher Paint
Elm Street Site
UST area located between Grid Location N14 and O14.

Created Jul, 31 2003, 14:59:40 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 80 nS
Range Gain (dB) -1.0 23.0 48.0
59.0
Vert IIR LP N =1 F =610 MHz
Vert IIR HP N =2 F =35 MHz
Horz IIR Stack TC =3

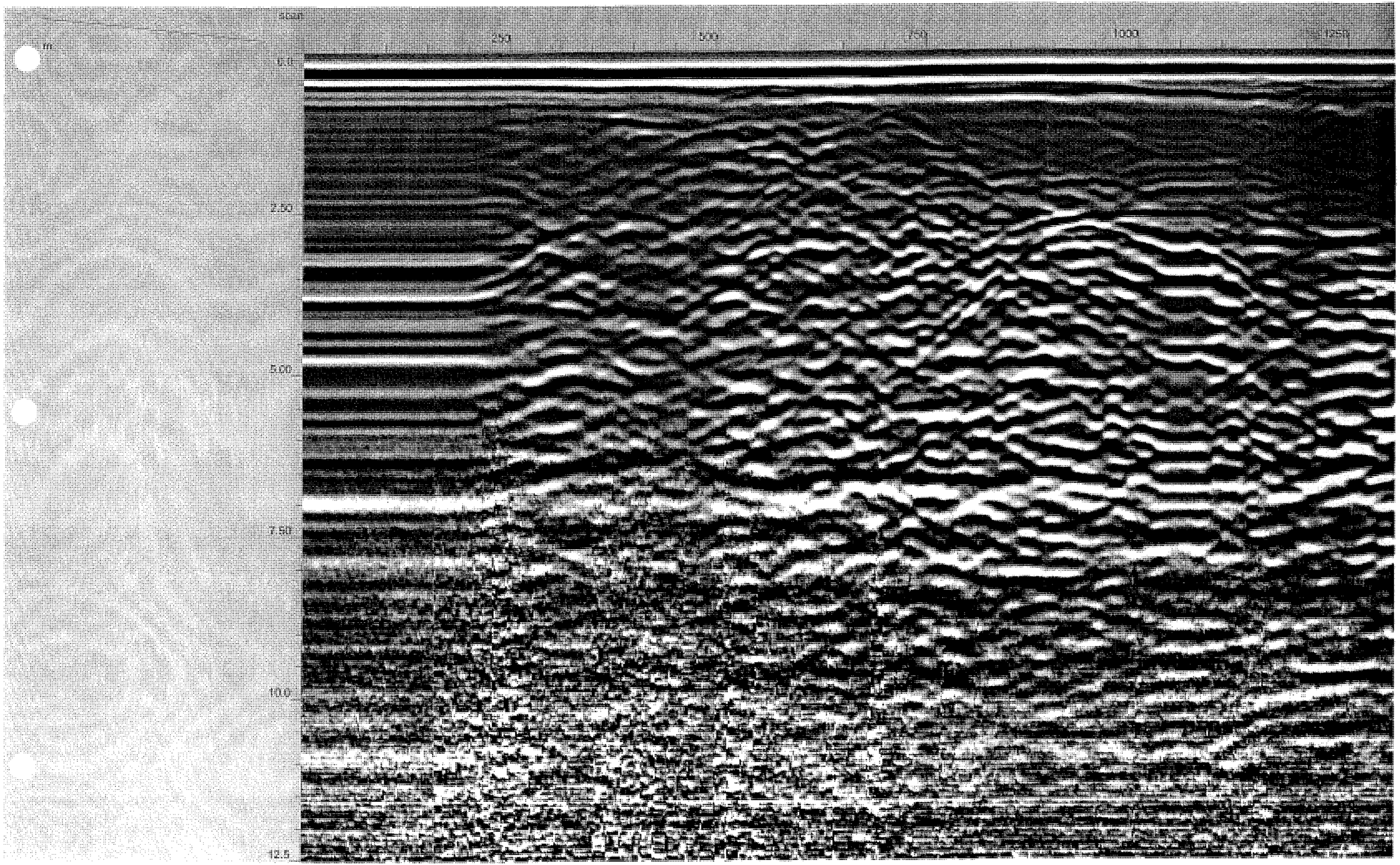

0.0
1.00
2.00
3.00
4.00

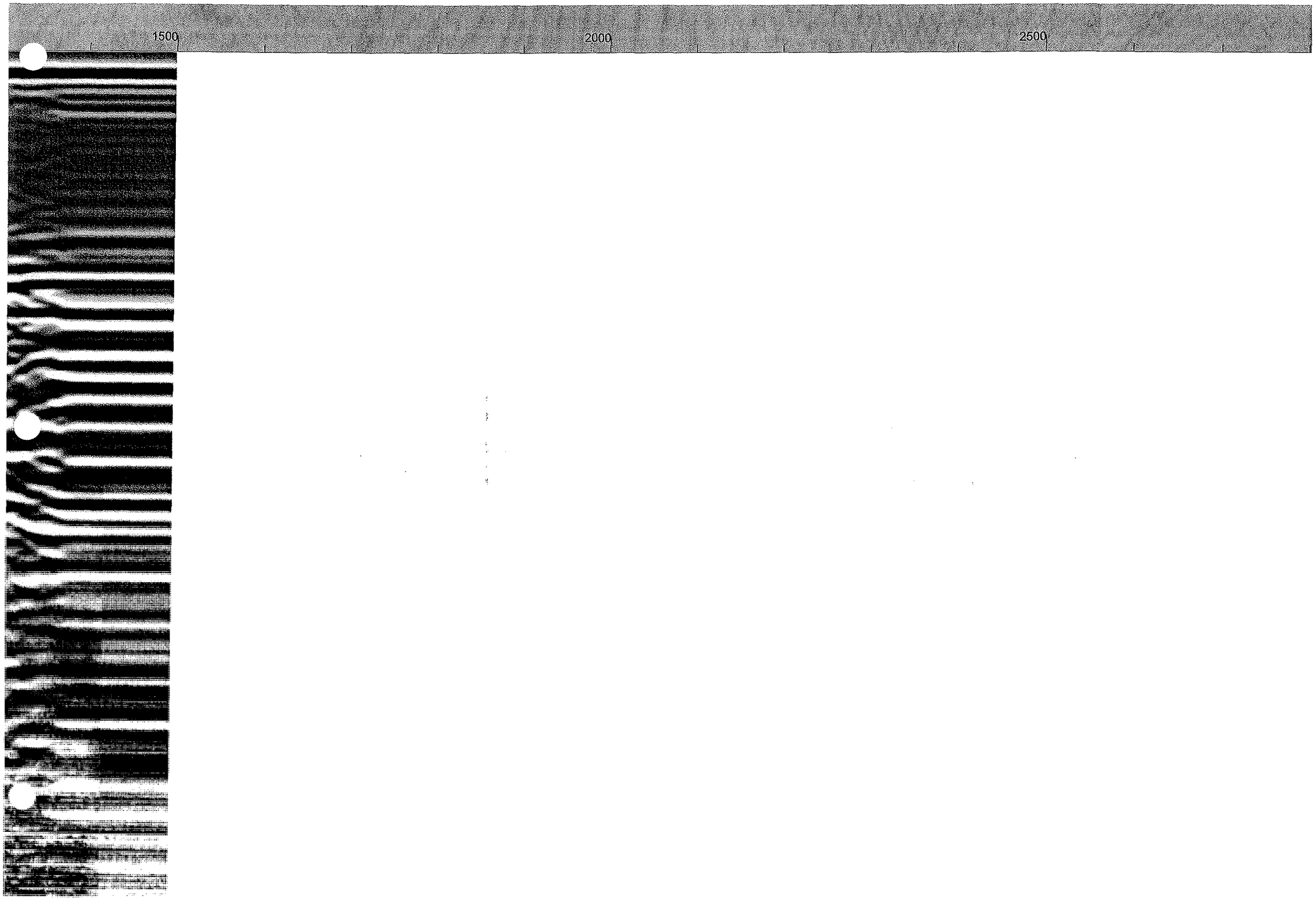
800
1000
1200
1400

GE - Fletcher Paint
Elr ·reet Site
Ar. etween K08 and I07

Created Jul, 31 2003, 13:24:18 Modified 00:00:00
Channel(s) 1 Samples/Scan 1024 Bits/Sample 16
Scans/Second 32 Scans/Meter 0 Meters/Mark 0
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 240 nS
Range Gain (dB) 6.0 40.0 66.0
77.0 83.0
Vert IIR LP N =1 F =400 MHz
Vert IIR HP N =2 F =30 MHz
Horz IIR Stack TC =5

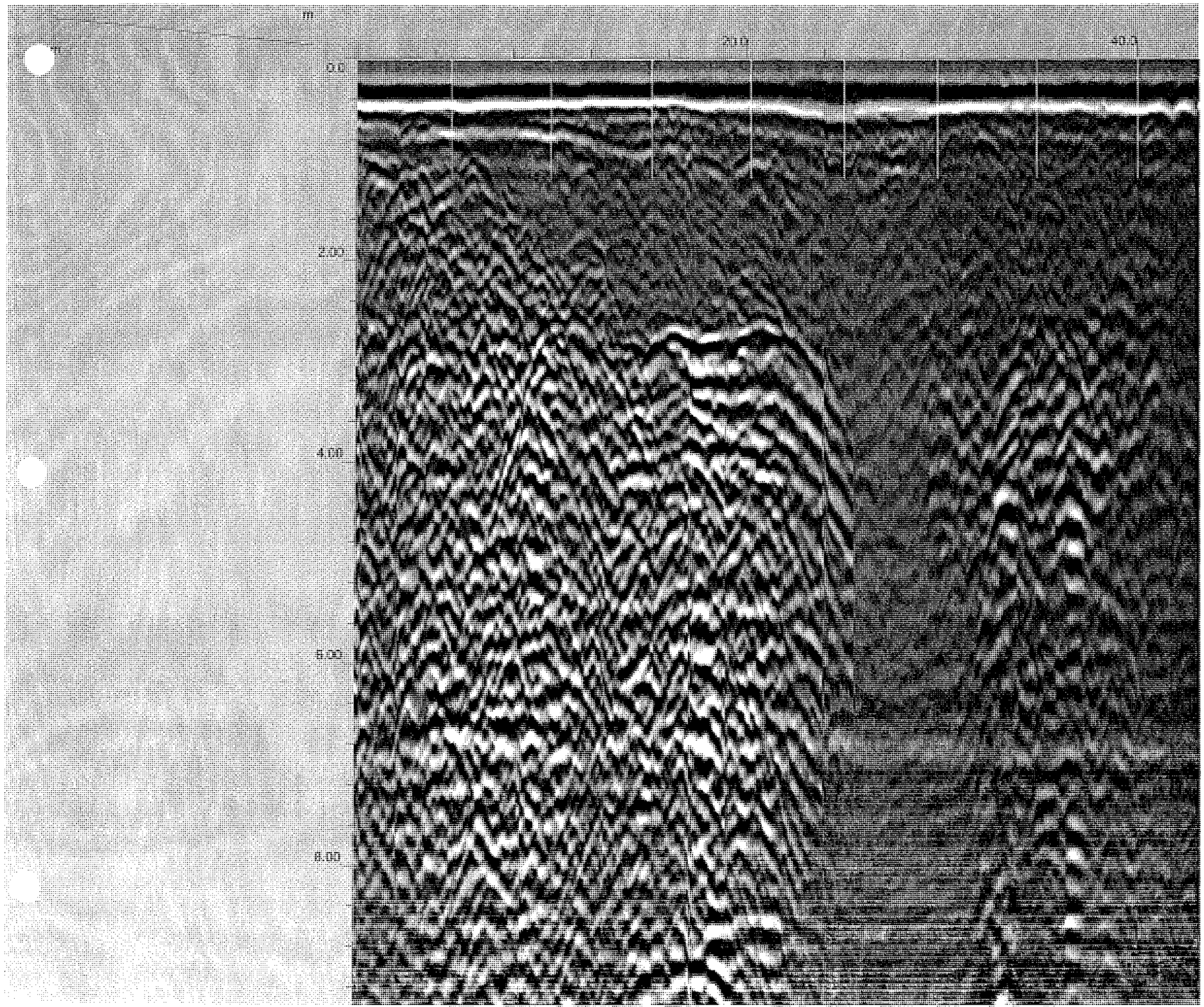

m
250
500
750
1000
1250
2.50
5.00
7.50
10.0
12.5


1500
2000
2500

GE - Fletcher Paint
Elm Street Site
1' t south of K08 to 5 feet north of MW-04C

Created Jul, 31 2003, 13:31:42 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 5
Diel Constant 8

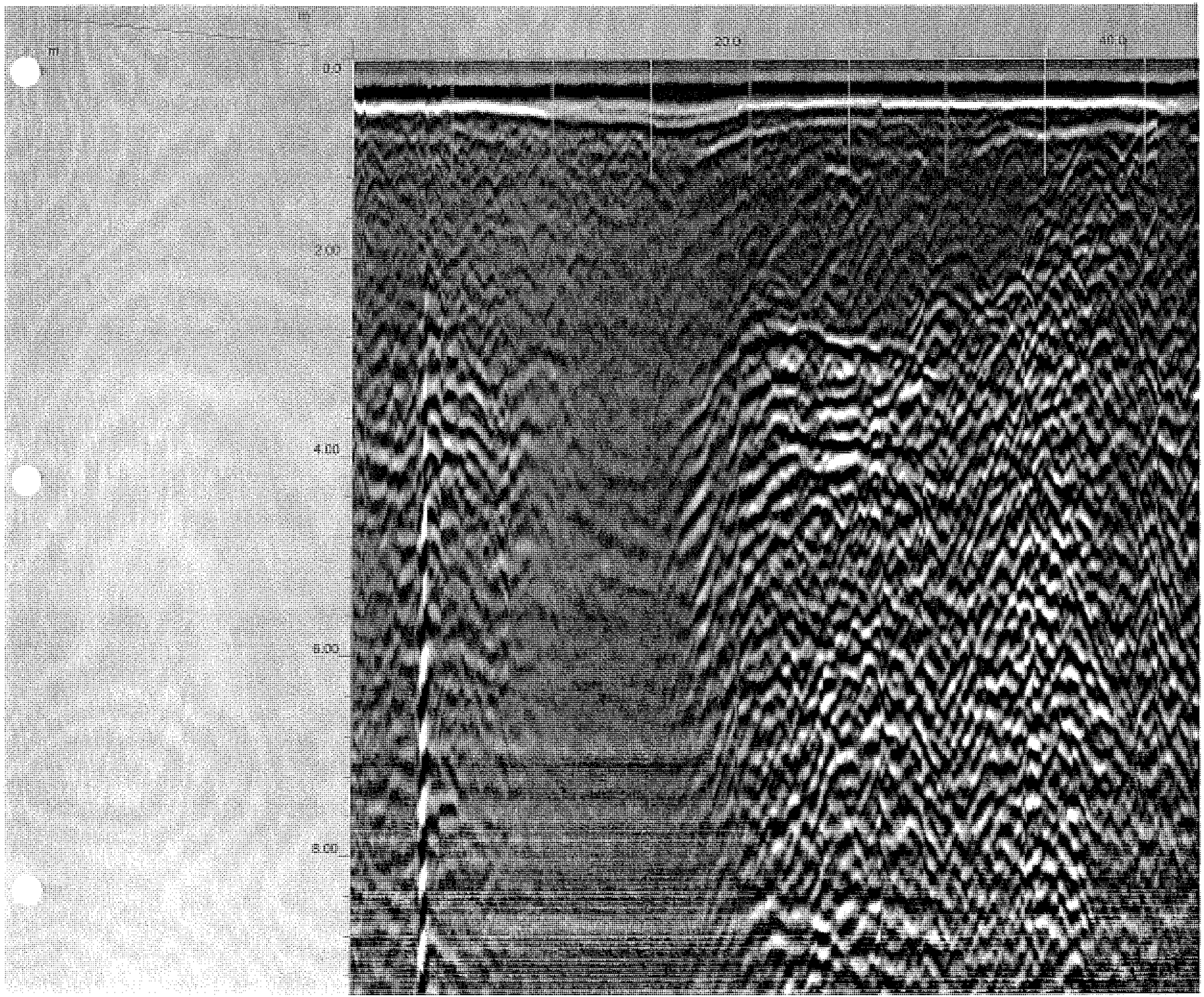
CHANNEL 1 200D
Position 0 nS Range 180 nS
Range Gain (dB) 1.0 37.0 64.0
75.0
Vert IIR LP N =1 F =810 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3


m
2.00
4.00
6.00

GE - Fletcher Paint
Elm Street Site
f MW-04C to 15 feet south of K08 and 10 ft west

Created Jul, 31 2003, 13:37:54 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 5
Diel Constant 8

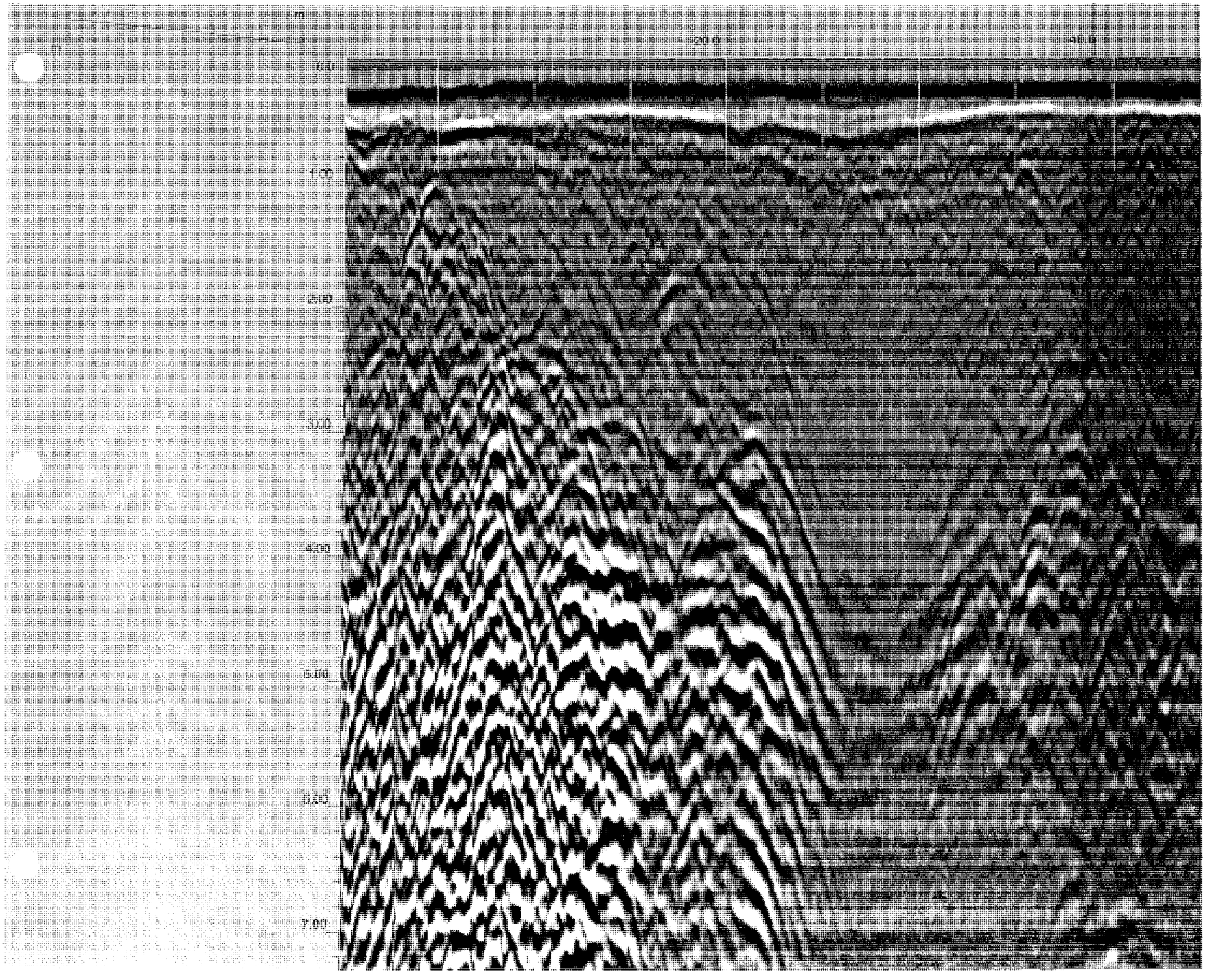
CHANNEL 1 200D
Position 0 nS Range 180 nS
Range Gain (dB) 1.0 37.0 64.0
75.0
Vert IIR LP N =1 F =810 MHz
Vert IIR HP N =2 F =50 MHz
Horz IIR Stack TC =3


m
0.0
2.00
4.00
6.00
8.00
20.0
40.0

GE - Fletcher Paint
Elr `reet Site
'rc. 5 feet south and 10 ft east of K08 to MW-04B

Created Jul, 31 2003, 13:42:18 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 5
Diel Constant 8

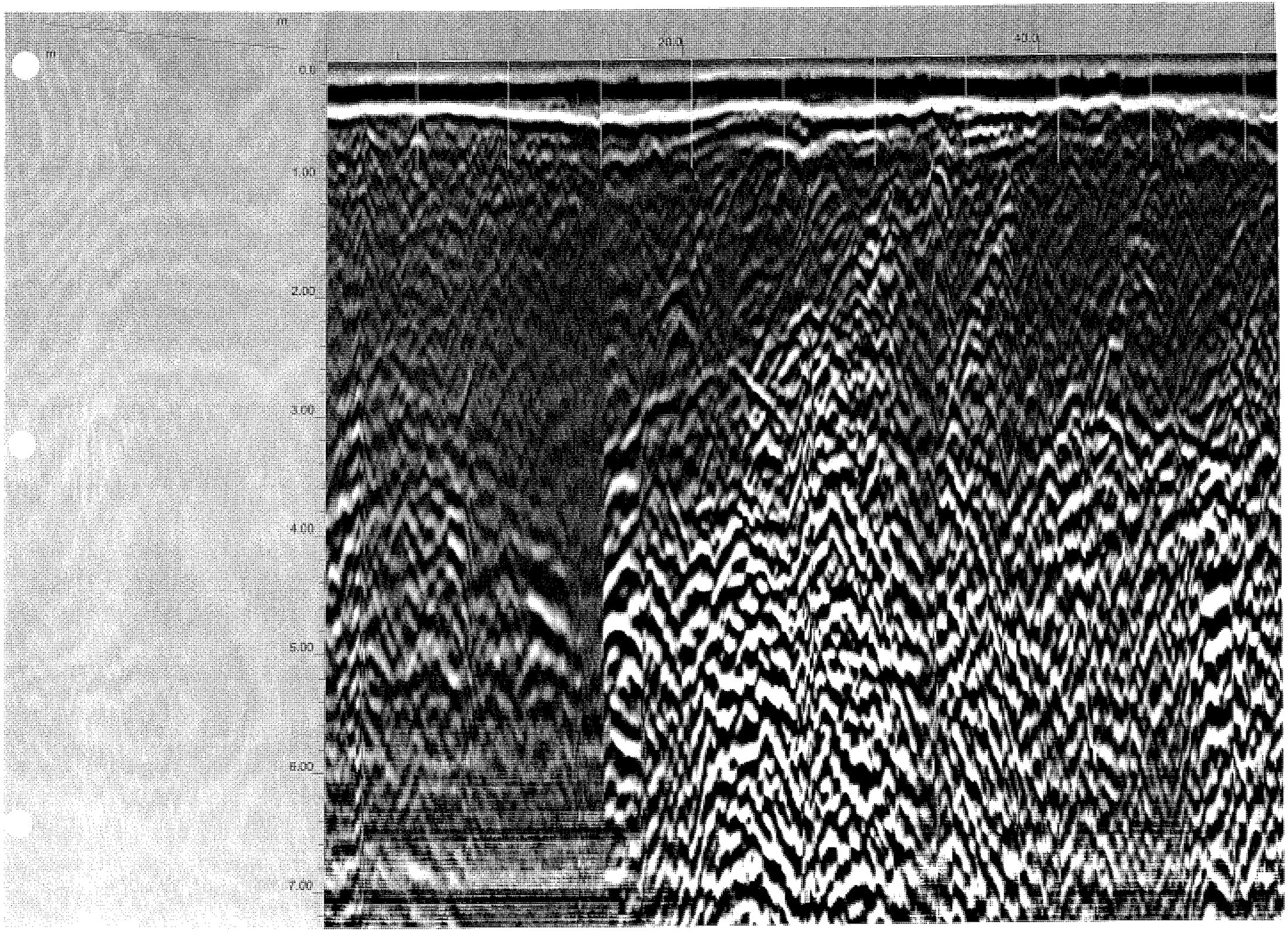
CHANNEL 1 200D
Position 0 nS Range 140 nS
Range Gain (dB) 0.0 25.0 61.0
74.0
Vert IIR LP N =1 F =770 MHz
Vert IIR HP N =2 F =45 MHz
Horz IIR Stack TC =3


m
m
20.0
40.0
0.0
1.00
2.00
3.00
4.00
5.00
6.00
7.00

GE - Fletcher Paint
Elm Street Site
5 ft south of MW-04B to Grid Location M10.

Created Jul, 31 2003, 13:47:00 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 5
Diel Constant 8

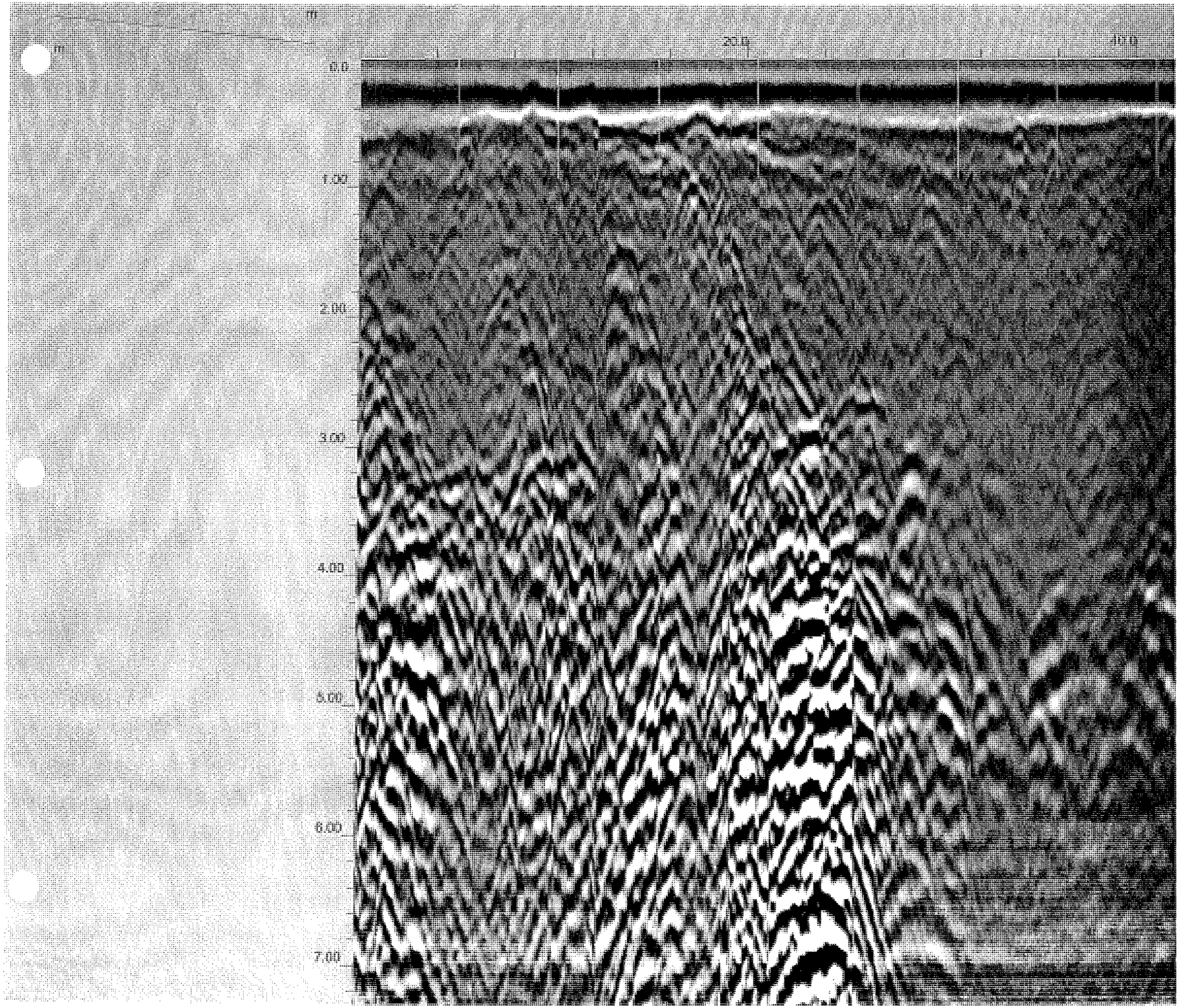
CHANNEL 1 200D
Position 0 nS Range 140 nS
Range Gain (dB) 0.0 25.0 61.0
74.0
Vert IIR LP N =1 F =770 MHz
Vert IIR HP N =2 F =45 MHz
Horz IIR Stack TC =3


m
m
20.0
40.0
0.0
1.00
2.00
3.00
4.00
5.00
6.00
7.00

GE - Fletcher Paint
Elm Street Site
fr ;rid Location M10 to G06.

Created Jul, 31 2003, 13:54:22 Modified 00:00:00
Channel(s) 1 Samples/Scan 512 Bits/Sample 8
Scans/Second 32 Scans/Meter 20 Meters/Mark 5
Diel Constant 8

CHANNEL 1 200D
Position 0 nS Range 140 nS
Range Gain (dB) 0.0 25.0 61.0
74.0
Vert IIR LP N =1 F =770 MHz
Vert IIR HP N =2 F =45 MHz
Horz IIR Stack TC =3


m
m
20.0
40.0
0.0
1.00
2.00
3.00
4.00
5.00
6.00
7.00

Appendix G

BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Appendix G

November 6, 2003 Results of Monitoring Well Survey Letter

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers, scientists, economists

Lewis S. Streeter
Project Manager

General Electric Company
Corporate Environmental Programs
320 Great Oaks Boulevard, Suite 323
Albany, NY 12203-5965
Phone: 518-862-2712; Dial Comm: 8*232-2712
Fax: 518-862-2702; Dial Comm: 8*232-2702
E-mail: Lewis.Streeter@corporate.ge.com

November 6, 2003

Ms. Cheryl Sprague
Remedial Project Manager
U.S. Environmental Protection Agency
1 Congress Street, Suite 1100 (HBO)
Boston, MA 02114

Subject: Results of Monitoring Well survey, and Proposed Repair and Replacement activities Fletcher's Paint Works and Storage Facility Superfund Site CERCLA Docket No. 01-2001-0063

Dear Ms. Sprague:

Attached please find a letter prepared by Blasland, Bouck & Lee, Inc., (BBL) summarizing the results of the well survey task (Section 4.4.1.5 of the Pre-Design Work Plan) performed as part of the Phase I pre-design investigation activities at the referenced site. This summary also provides recommendations for the repair and/or replacement of select monitoring wells.

In summary, five monitoring wells could not be located during this survey (NHDES-01, NHDES-02, Mobil-1, MW-05B, and MW-20A) and one well has an obstruction approximately 17 feet below grade, (MW-02A) and is not useable. We are proposing to replace monitoring wells MW-02A and MW-05B. Monitoring well MW-20A will not be replaced since previously proposed monitoring wells MW-26A and MW-29B will be installed in the same vicinity. Monitoring wells NHDES-01 and NHDES-02 were shallow, up gradient monitoring wells. Previously proposed monitoring well clusters MW-10 and MW-25 will provide up gradient water quality data and therefore these wells will not require replacement. Additional details are provided in the attached letter.

We are currently scheduled to begin well installation activities on December 1, 2003. Further, because monitoring wells MW-05B, MW-10C and the MW-25 cluster will be installed in clean areas, we plan to follow an industry best practice and install these wells first. Therefore, based on this schedule we would appreciate having the EPA's written response and/or approval to proceed with these activities, prior to December 1, 2003.

If you have any questions or comments regarding this information, please do not hesitate to contact me at the letterhead address.

Sincerely,

Lewis S. Streeter
Remedial Project Manager

Attachment: BBL November 5, 2003 letter

cc: Bonnie Harrington, GE, (with attachments)
Corey Averill, Blasland, Bouck & Lee, (w/o attachments)

Well repair trans ltr to epa nov 03.doc

BBL®
BLASLAND, BOUCK & LEE, INC.
engineers & scientists

November 5, 2003

Mr. Lewis S. Streeter
Remedial Project Manager
General Electric Company
Corporate Environmental Programs
320 Great Oaks Boulevard, Suite 323
Albany, NY 12203-5965

Re: Scope of Work for Miscellaneous Monitoring Well Activities
Fletcher's Paint Works and Storage Facility Superfund Site (OU-1)
Milford, New Hampshire
BBL Project # 0201.10002 #1

Dear Mr. Streeter:

On July 22 and 23, 2003 Blasland, Bouck & Lee, Inc., (BBL), on behalf of the General Electric Company (GE), performed monitoring well survey activities as part of the Phase 1 pre-design investigation activities at the Fletcher Paint Works and Storage Facility Superfund Site located in Milford, NH. The scope of these survey activities was originally proposed in GE's draft *Pre-Design Work Plan* (PDWP, December 2001). EPA provided comments on the draft PDWP, including the proposed monitoring well survey activities, in a letter to GE dated May 1, 2003 (with hardcopy received on May 8, 2003). In the interest of expediting implementation of the Phase 1 pre-design investigation activities, GE submitted responses to those EPA comments along with any proposed modifications to the PDWP in a letter dated May 14, 2003. The EPA subsequently provided approval of the Phase 1 pre-design activities (as commented on by the EPA in its May 1, 2003 letter and as modified in GE's May 14 letter) in a letter to GE dated May 15, 2003.

The revised scope of the monitoring well survey activities was included in GE's revised draft PDWP (June 2003). As indicated in that document and the accompanying *Surface Water and Groundwater Management Plan* (WMP), the potential network of monitoring wells to be included in the groundwater management zone (GMZ) consists of 32 previously installed monitoring wells located in and around the Site, supplemented by the installation of 19 new monitoring wells as part of the Phase 2 pre-design investigation activities. To determine the suitability of the 32 previously installed wells for inclusion in the GMZ, the following activities were performed:

- Location/identification of the existing monitoring wells located in and around the Site;
- Exterior conditions survey/inspection, including:
  - Condition of protective casing and cover;
  - Condition of visible portion of inside of each well; and
  - Condition of well cap, lock, concrete surface seal, and other materials of construction.

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Tel (315) 446-9120 • Fax (315) 449-0017 • www.bbl-inc.com • offices nationwide

- Internal conditions survey/inspection, including:
  - Visible plumbness;
  - Static water level;
  - Turbidity; and
  - Bottom sediment thickness, if any.
- Collection of a grab sample from each well to determine if any non-aqueous phase liquids (NAPLs) were present in the wells.

The remainder of this letter presents a brief summary of the results from the monitoring well survey, as well as the proposed repair and replacement activities. In addition, the attached table presents the results of the monitoring well survey activities performed on July 22 and 23, 2003. The following items in the attached table are worthy of note:

- BBL personnel were able to locate 27 of the 32 existing monitoring wells proposed for inclusion in the monitoring well network for the Site.
- The following wells were not located:
  - MW-05B (Keyes Park);
  - MW-20A (Elm Street);
  - MOBIL-1 (south of Elm Street, behind convenience store);
  - NHDES-01 (southwest of Mill Street); and
  - NHDES-02 (southwest of Mill Street).

  EPA and New Hampshire Department of Environmental Services (NHDES) personnel assisted BBL personnel in the field in attempting to locate NHDES-01 and NHDES-02. In addition, NHDES personnel attempted to locate documentation in their project files regarding the location of these wells. Both activities were unsuccessful.
- Monitoring well MW-02A has an obstruction located approximately 17 feet below ground surface. BBL personnel were unable to advance an interface probe or water tape past the obstruction.
- NAPLs were not observed in any of the wells, with the exception of a petroleum sheen observed in monitoring well GULF-02. Additionally, no flocculent material was observed in any of the sampled monitoring wells (including MW-7A, in which this material was previously observed).
- All of the 27 accessed wells are in varying states of disrepair (e.g., missing/broken slip caps, missing/broken J-plugs, damaged curb boxes, missing locks, missing bolts), as expected after up to 10 years of inactivity.

The results of the monitoring well survey indicate that 26 of the 32 existing monitoring wells proposed in the PDWP and WMP for inclusion in the monitoring well network for the Site are available for that purpose. Accordingly, BBL has performed an evaluation of the need to replace the six missing/obstructed wells. This evaluation included a review of the boring logs to identify well construction information (e.g., total depth, screened intervals), a review of historic groundwater sample data, and the location of these wells with respect to other existing and proposed monitoring wells in the monitoring well network.

Based on this evaluation, monitoring wells MW-02A and MW-05B should be replaced as part of the upcoming Phase 2 pre-design investigation activities. Replacement of the other missing wells (MOBIL-1, MW-20A, NHDES-1, and NHDES-02) is not required since other existing or proposed monitoring wells will meet the data needs in the areas of these former wells, as further discussed below.

- NHDES-01 and NHDES-02 were shallow wells (total depths of approximately 4 feet and 7 feet, respectively) located upgradient of the Mill Street Site. Replacement of these wells is not required since existing wells MW-10A and MW-10B and proposed wells MW-10C, MW-25B, and MW-25C will provide sufficient data to characterize upgradient/background groundwater quality.

- Well construction data for the MOBIL-1 well is unavailable. However, replacement of this well, which was located between the Mill and Elm Street Sites, is not necessary since existing wells MW-08A and MW-08B and proposed wells MW-23A, MW-23B, MW-23C, MW-24A, MW-24B, and MW-24C are/will be located between the Mill Street and Elm Street Sites. In addition, proposed wells MW-22A, MW-22B, and MW-22C will be installed along the northern boundary of the Mill Street Site.

- MW-20A was a deep overburden monitoring well located in the vicinity of the former building on the Elm Street Site. This well may be located beneath the sand cap placed over the former building foundation by the EPA's contractors following building demolition activities. BBL personnel were not able to locate this well during performance of the geophysical investigation activities. Replacement of this well is not necessary since proposed monitoring well MW-26A will be installed in the same general area and screened at the same interval. This new well will therefore provide similar groundwater characterization data as former well MW-20A.

In addition to the replacement of monitoring wells MW-02A and MW-05B, BBL proposes certain maintenance and/or repair activities for the wells installed by EPA. As such, the recommendations portion of the attached table lists the repairs proposed by BBL for these wells which will be completed during the Phase 2 pre-design investigation activities. For the monitoring wells with MOBIL/GULF designations, BBL will perform minor maintenance/repair activities (e.g., remove sediment, replace well caps, replace bolts). However, BBL will not perform other maintenance/repair activities (e.g., installing locks, replacement of curb boxes) since these wells are likely being monitored by other agencies/organizations (i.e., Mobil, Chevron, and/or NHDES) and may be associated with GMZ(s) for former leaking underground storage tank site(s).

Please call me if you have any questions regarding the information presented in this letter.

Sincerely,

Corey R. Averill
Project Manager

V:\GE_Fletcher_Paint_ Correspondence\2013199.doc

cc: Lowell McBurney, BBL
Michael Gefell, BBL
File 100.02

TABLE 1
JULY 2003 MONITORING WELL SURVEY

FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE - OU-1
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

		GENERAL OBSERVATIONS							WELL CONDITION			
Well ID	Date	ID Clearly Marked?	Well Completion	Lockable Cover?	Lock Present?	Measuring Point Marked?	Riser Diameter	Riser Type	Cement Intact?	Curb Box / Well Cover Present?	All Bolts Present?	Well Cap
GULF-01	7/23/2003	Added	Flush Mount	No	No	Added	4"	PVC	No	Yes	No	None
GULF-02	7/23/2003	Added	Flush Mount	Damaged	No	Added	4"	PVC	Yes	Yes	No	Pressure-Fit
GULF-03	7/23/2003	Added	Flush Mount	Damaged	No	Added	4"	PVC	Yes	Yes	Yes	Pressure-Fit
GULF-04	7/23/2003	Added	Flush Mount	Damaged	No	Added	4"	PVC	Yes	Damaged	No	Pressure-Fit
MOBIL-01	7/23/2003	UNABLE TO LOCATE WELL, POSSIBLY PAVED OVER?										
MOBIL-02	7/23/2003	Added	Flush Mount	Damaged	No	Yes	2"	PVC	Yes	Damaged	Yes	Pressure-Fit
MOBIL-04	7/23/2003	No	Flush Mount	No	No	Yes	2"	PVC	Yes	Yes	No	Pressure-Fit
MW-01A	7/22/2003	Yes	Flush Mount	No	No	Added	2"	PVC	Yes	Yes	Yes	PVC Slip Cap
MW-01B	7/22/2003	Yes	Flush Mount	Yes	No	Added	2"	PVC	Yes	Yes	Yes	Pressure-Fit
MW-02A	7/22/2003	Yes	Flush Mount	Yes	Yes	Added	2"	PVC	Yes	Yes	No	PVC Slip Cap
MW-02B	7/22/2003	Yes	Flush Mount	Damaged	No	Added	2"	PVC	Yes	Yes	No	Pressure-Fit
MW-03A	7/22/2003	Yes	Flush Mount	Damaged	No	Added	2"	PVC	Yes	Yes	No	Pressure-Fit
MW-03B	7/22/2003	Yes	Flush Mount	Yes	No	Added	2"	PVC	Yes	Yes	Yes	PVC Slip Cap
MW-04A	7/23/2003	Yes	Flush Mount	Yes	No	Added	2"	PVC	Yes	Yes	Yes	Pressure-Fit
MW-04B	7/23/2003	Yes	Flush Mount	Yes	No	Added	2"	PVC	Yes	Yes	Yes	PVC Slip Cap
MW-04C	7/23/2003	Yes	Flush Mount	Yes	No	Yes	2"	PVC	Yes	Yes	No	PVC Slip Cap
MW-05A	7/23/2003	Yes	Above-Grade Standpipe	Yes	No	Yes	2"	PVC	Yes	Yes	NA	PVC Slip Cap
MW-05B	7/23/2003	UNABLE TO LOCATE WELL, WELL RISER HIT BY VEHICLE?										
MW-07A	7/23/2003	Added	Above-Grade Standpipe	Yes	Added	Yes	2"	PVC	Yes	Yes	NA	Pressure-Fit
MW-08A	7/23/2003	Added	Flush Mount	No	No	Yes	2"	PVC	Yes	Yes	Yes	Pressure-Fit
MW-08B	7/23/2003	Added	Flush Mount	Yes	No	Yes	2"	PVC	Yes	Yes	Yes	Pressure-Fit
MW-09A	7/23/2003	Added	Flush Mount	Yes	No	Yes	2"	PVC	Yes	Yes	Yes	PVC Slip Cap
MW-09B	7/23/2003	Added	Flush Mount	Yes	Yes	Yes	2"	PVC	Yes	Yes	No	Pressure-Fit
MW-10A	7/23/2003	Yes	Above-Grade Standpipe	Yes	No	Yes	2"	PVC	Yes	Yes	NA	None
MW-10B	7/23/2003	Yes	Above-Grade Standpipe	Yes	No	Yes	2"	PVC	Yes	Yes	NA	Pressure-Fit
MW-11A	7/23/2003	Added	Flush Mount	Yes	Yes	Yes	2"	PVC	Yes	Yes	Yes	Pressure-Fit
MW-11B	7/23/2003	Added	Flush Mount	Yes	Yes	Yes	2"	PVC	Yes	Yes	Yes	Pressure-Fit
MW-18B	7/23/2003	Added	Flush Mount	Yes	No	Yes	2"	PVC	Yes	Yes	No	Pressure-Fit
MW-20A	7/23/2003	UNABLE TO LOCATE WELL, UNDER CAP OVER BUILDING FOUNDATION (GEOPHYSICAL INVESTIGATION FOUND SCRAP METAL ONLY)										
MW-21C	7/23/2003	Yes	Above-Grade Standpipe	Yes	Yes	Yes	2"	PVC	Yes	Yes	NA	Pressure-Fit
NHDES-01	7/23/2003	UNABLE TO LOCATE WELL (SEARCHED WITH EPA/NHDES REPRESENTATIVES, NHDES CHECKING FILES)										
NHDES-02	7/23/2003	UNABLE TO LOCATE WELL (SEARCHED WITH EPA/NHDES REPRESENTATIVES, NHDES CHECKING FILES)										

TABLE 1
JULY 2003 MONITORING WELL SURVEY

FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE - OU-1
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

	WELL CONDITION / MEASUREMENTS										
Well ID	Well Vent	Measured Well Riser Stickup (feet)	Depth to Water	Depth to LNAPL	Depth to DNAPL	Turbidity (NTU)	Water Color/ Characteristics	Reported Total Depth of Well	Measured Total Depth of Well	Well Obstructed ?	Well Bottom
GULF-01	NA	-0.04	10.55 ft.	None	None	13	clear	--	17.5 ft. below casing	No	Soft
GULF-02	NA	-0.33	--	11.06' to 11.16'	None	Not Measured	yellow, turbid	--	18.66 ft. below casing	No	Soft
GULF-03	NA	-0.42	11.83 ft.	None	None	18	clear	--	16.20 ft. below casing	No	Soft
GULF-04	NA	-0.40	11.32 ft.	None	None	84	slightly yellow, turbid	--	18.72 ft. below casing	No	Soft
MOBIL-01											
MOBIL-02	NA	-0.38	14.01 ft.	None	None	Not Measured	tubing in well	17.76 ft. below casing	14.08 ft. below casing	Yes	Soft
MOBIL-04	NA	-0.46	11.91 ft.	None	None	7	clear	18.66 ft. below casing	17.57 ft. below casing	No	Soft
MW-01A	NA	-1.04	28.62 ft.	None	None	4	clear	52.16 ft. below grade	52.04 ft. below grade	No	Firm
MW-01B	NA	-0.77	27.0 ft.	None	None	110	slightly brown, turbid	32.63 ft. below grade	31.89 ft. below casing	No	Soft
MW-02A	NA	-1.25	POSSIBLE OBSTRUCTION							Yes (@ 17')	--
MW-02B	NA	-0.52	22.53 ft.	None	None	65	clear	29.09 ft. below grade	29.05 ft. below grade	No	Soft
MW-03A	NA	-0.92	14.31 ft.	None	None	17	clear	44.68 ft. below grade	44.60 ft. below grade	No	Firm
MW-03B	NA	-0.54	14.95 ft.	None	None	24	clear	20.17 ft. below casing	20.11 ft. below casing	No	Firm
MW-04A	NA	-1.00	11.21 ft.	None	None	6	clear	48.90 ft. below grade	48.49 ft. below grade	No	Soft
MW-04B	Hole in Cap	-0.96	11.54 ft.	None	None	17	clear	16.42 ft. below casing	16.35 ft. below casing	No	Firm
MW-04C	Hole in Cap	-0.65	10.98 ft.	None	None	44	clear	55.20 ft. below grade	55.15 ft. below grade	No	Firm
MW-05A	Hole in Cap	1.54	8.39 ft.	None	None	32	clear	55.01 ft. below grade	55.00 ft. below grade	No	Soft
MW-05B											
MW-07A	None	1.58	9.12 ft.	None	None	40	slightly yellow, turbid	18.84 ft. below grade	18.85 ft. below grade	No	Firm
MW-08A	NA	0.73	3.39 ft.	None	None	166	slightly cloudy	27.3 ft. below grade	27.15 ft. below grade	No	Soft
MW-08B	NA	0.33	4 ft.	None	None	73	slightly yellow, turbid	12.04 ft. below grade	11.95 ft. below grade	No	Firm
MW-09A	NA	-0.63	6.88 ft.	None	None	4	clear	22.19 ft. below grade	22.14 ft. below grade	No	Firm
MW-09B	NA	-0.43	6.5 ft.	None	None	36	slightly yellow, cloudy	13.4 ft. below casing	13.35 ft. below casing	No	Soft
MW-10A	Open	1.71	8.77 ft.	None	None	13	clear	33.92 ft. below casing	33.89 ft. below casing	No	Firm
MW-10B	None	1.48	6.10 ft.	None	None	75	slightly yellow, cloudy	15.75 ft. below casing	11.23 ft. below casing	No	Soft
MW-11A	NA	-0.73	27.92 ft.	None	None	4	clear	76.95 ft. below casing	76.90 ft. below casing	No	Soft
MW-11B	NA	-0.75	28.58 ft.	None	None	3	clear	34.46 ft. below casing	34.44 ft. below casing	No	Firm
MW-18B	NA	-0.71	22.0 ft.	None	None	35	clear	28.34 ft. below casing	28.19 ft. below casing	No	Firm
MW-20A											
MW-21C	None	2.50	9.68 ft.	None	None	2	clear	29.0 ft. below grade	30.87 ft. below grade	No	Firm
NHDES-01											
NHDES-02											

TABLE 1
JULY 2003 MONITORING WELL SURVEY

FLETCHER'S PAINT WORKS AND STORAGE FACILITY SUPERFUND SITE - OU-1
GENERAL ELECTRIC COMPANY - MILFORD, NEW HAMPSHIRE

	RECOMMENDATIONS						
Well ID	Repair/Replace Concrete Surface Completion?	Re-Survey Well?	Remove Sediment and Re-Measure Depth?	Replace Well Cap?	Install/Replace Lock?	Replace Bolts?	Miscellaneous Observations/ Recommendations
GULF-01	No	Yes	Yes	Yes	No	Yes	None
GULF-02	No	Yes	Yes	Yes	No	Yes	Approximately 1/2" of brown petroleum layer.
GULF-03	No	Yes	Yes	Yes	No	No	Need hex wrench to open.
GULF-04	No	Yes	Yes	Yes	No	Yes	Need hex wrench to open.
MOBIL-01							
MOBIL-02	No	Yes	Yes	Yes	No	Yes	Tubing in well, unable to reach. Need hex wrench to open.
MOBIL-04	No	Yes	Yes	Yes	No	Yes	Bolts stripped. Rethread or use nuts. No lock present.
MW-01A	No	Yes	No	Yes	Yes	No	None
MW-01B	Yes	Yes	Yes	Yes	Yes	No	None
MW-02A	--	--	--	--		--	Could not get water tape below 17.0 feet.
MW-02B	No	Yes	Yes	Yes	Yes	Yes	PVC needs to be cut down and resurveyed in order to use locking cover.
MW-03A	No	Yes	No	Yes	Yes	Yes	None
MW-03B	No	Yes	No	Yes	Yes	No	None
MW-04A	No	Yes	Yes	Yes	Yes	No	None
MW-04B	No	Yes	No	Yes	Yes	No	None
MW-04C	No	Yes	No	No	Yes	Yes	None
MW-05A	No	Yes	Yes	No	Yes	NA	None
MW-05B							
MW-07A	No	Yes	No	No	Yes	NA	None
MW-08A	Yes	Yes	Yes	Yes	Yes	Yes	None
MW-08B	No	Yes	No	No	Yes	No	Located to the right of stone pile.
MW-09A	No	Yes	No	No	Yes	No	Well under concrete divider, subsequently moved divider.
MW-09B	No	Yes	Yes	No	Yes	Yes	None
MW-10A	No	Yes	No	Yes	Yes	NA	Possibly cut down PVC riser (if so, resurvey).
MW-10B	No	Yes	Yes	No	Yes	NA	None
MW-11A	No	Yes	Yes	Yes	Yes	No	Well is located behind daycare center, along Hampshire Paper building.
MW-11B	Yes	Yes	No	No	Yes	No	Some water in curb box. Possibly repair seals.
MW-18B	No	Yes	No	No	Yes	Yes	Well in roadway. J-plug was in well at time of survey.
MW-20A							
MW-21C	No	Yes	No	No	Yes	NA	None
NHDES-01							
NHDES-02							