URS

SUMMARY OF CLOSURE ACTIVITIES

COMMERCIAL PCB STORAGE AREA
GE INSPECTION AND
REPAIR SERVICE CENTER
TONAWANDA, NEW YORK

February 6, 2006

Prepared by:

URS CORPORATION – NEW YORK

URS

February 6, 2006

Mr. Dan Kraft
USEPA – Region 2
Raritan Depot
2890 Woodbridge Avenue
Edison, New Jersey 08837-3679

RE: Commercial PCB Storage Area Closure
GE Energy
175 Milens Road
Tonawanda, New York

Dear Mr. Kraft,

GE Energy (GE) requests that the cleanup objectives listed in the June 2000 *Revised Closure Plan* (*2000 Closure Plan*) be revised. The specific revisions and rationale for the proposed revisions are discussed in the remainder of this letter.

GE implemented the procedures described in the *2000 Closure Plan* to close the Commercial PCB Storage Area at its active Inspection and Repair Service Center in Tonawanda, New York. The storage area itself has been successfully addressed by the procedures specified in the *2000 Closure Plan*. However, the results of samples collected from adjacent areas (the shop floor and pavement south of the building) indicate that the PCB impacts at the facility extend beyond the permitted area. It is GE's belief that these impacts are from historical (pre-TSCA) poor housekeeping practices and are not directly related to the Commercial PCB Storage Area. The sampling and closure activities conducted to date are presented in the *Summary of Closure Activities* attached to this letter, and are briefly summarized below.

The cleanup objectives in the *2000 Closure Plan* were based on the cleanup objectives for new spills provided in Subpart G PCB Spill Cleanup Policy. We propose to amend the cleanup objectives to other provisions in TSCA that are more appropriate for an industrial facility with historical contamination. Specifically:

- 40 CFR Part 761.30(p) – Continued use of porous surfaces. This provision allows continued use of concrete surfaces via the double wash rinse process, covering with two solvent resistant and water repellant coatings of contrasting color, and labeling with the M_L mark.

- 40 CFR 761.61(a)(4)(i)(B) – Cleanup levels for low occupancy areas. This provision develops a cleanup level of 25 mg/kg for areas defined as low occupancy. The paved area at the site is within the fenced perimeter of the facility, is used for employee parking and storage, and meets the definition of a low occupancy area as described in 40 CFR 761.3.

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As described in the attached *Summary of Closure Activities*, GE has performed the double wash double rinse procedure, encapsulated the floor with two contrasting colored epoxy coatings, and labeled the floor with the M_L mark specified in 40CFR Part 761.30(p). These actions have been undertaken in accordance with the provisions set forth in TSCA.

As described in the attached *Summary of Closure Activities*, investigation of PCB impacts to the pavement south of the building, which was conducted in accordance with the *2000 Closure Plan*, indicated that impacts were limited to surface contamination. Based on the analytical results, GE developed a plan to remove the top inch of pavement, collect confirmatory samples, and lay new pavement. In accordance with the *2000 Closure Plan*, Ms. Dawn Varacchi-Ives of GE discussed the plan for addressing the surface contamination of pavement south of the shop with Mr. James Reidy of the USEPA on December 1, 2004, and further with Mr. Dan Kraft of USEPA on December 3, 2004. Mr. Kraft was in general agreement with the plan. It was agreed that full details of the work would be described in the closure report. During implementation of this plan in December 2004, it was discovered that impacts extended beyond the surface in certain areas of the pavement. Due to the imminent arrival of winter, GE elected to install the planned 1-inch topcoat of pavement to get the facility through the winter, and review the new analytical data and overall project situation. Field observations during the work in December 2004 indicate that there are multiple layers of asphalt at the facility. The confirmatory sample results indicate PCB concentrations above 1 mg/kg, but below the low occupancy cleanup level of 25 mg/kg, beneath the top 1-inch of pavement. Based on our review of the available information, it appears that these PCB impacts are likely attributable to historical poor housekeeping practices on previously exposed asphalt.

The levels remaining in the parking area of the shop meet the cleanup levels for low occupancy area, as defined in 40 CFR 761.61(a)(4)(i)(B). Due to the technical impracticability of achieving the cleanup objectives laid out in the RCP at an active facility, GE elected to address the historical contamination on the shop floor in accordance with 40 CFR 761.30(p) – continued use of porous surfaces contaminated with PCBs. These cleanup activities are consistent with TSCA regulations, but were not specifically outlined as options in the *Revised Closure Plan*. GE and URS request a modification to the objectives of the *RCP* to incorporate the actions taken to address historical PCB impacts at the facility.

Upon the USEPA's acceptance of the revisions to the closure plan discussed in this letter, GE will prepare and submit a certification report for closure of the Commercial PCB Storage Area. Once the USEPA and the New York State Department of Environmental Conservation (NYSDEC) have accepted the closure certification report, GE will amend their deed to note the low occupancy status of the paved area south of GE's shop and the need for special care of the epoxy coated floor.

The Commercial PCB Storage Area has been permitted under TSCA as well as under the facility's 373 Permit, which was issued by the NYSDEC. GE proposes that upon review and acceptance of the certification report, the USEPA provide a letter issuing clean closure and that post-closure care requirements be managed under the NYSDEC RCRA program.

-oOo-

If you have any questions regarding this material, please contact Ms. Dawn Varacchi-Ives of GE at (508) 836-6728 or Ms. Karen Peppin of URS at (518) 688-0015.

Very truly yours,

URS Corporation – New York

Karen Peppin
Project Engineer

Don Porterfield, P.E.
Environmental Manager, Clifton Park

Attachment: *Summary of Closure Activities*

cc: Steve Malsan – NYSDEC
Kate Emery – NYSDEC
Dawn Varacchi-Ives – GE
Anthony Hejmanowski – GE

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1.0 INTRODUCTION

On behalf of GE Energy (GE), URS Corporation – New York (URS) has prepared this *Summary of Closure Activities* (*Summary*) for the Commercial PCB Storage Area at GE's Tonawanda Inspection and Repair Service Center. This report summarizes the work GE has completed to close their Commercial PCB Storage Area in general accordance with the *Revised Closure Plan* (*RCP*), dated June 28, 2000. The *RCP* was approved by the Environmental Protection Agency (USEPA) in a letter dated June 29, 2000. During implementation of the *RCP*, GE identified impacts to the facility outside of the PCB storage area. These impacts appear to be from historical (pre-TSCA) poor housekeeping practices and not directly related to the approved PCB storage area. GE has conducted work beyond the scope of the *RCP* in general accordance with the *RCP* and the provisions of the Toxic Substance Control Act (TSCA). GE is seeking to modify the objectives of the *RCP*, to alternative provisions and clean-up standards allowed by the TSCA regulations.

In 1995, USEPA issued an approval for GE to operate the Tonawanda shop as a commercial storage facility for PCB wastes. The approval, which was issued by the USEPA under TSCA, expired on July 31, 2000.

In New York State, the Resource Conservation and Recovery Act (RCRA) program, which regulates hazardous wastes, is administered by the New York State Department of Environmental Conservation (NYSDEC). A *6NYCRR Part 373 Hazardous Waste Management Permit* (*373 Permit*) was issued by the NYSDEC for the Tonawanda service shop in May 1996 and also covers the Commercial PCB Storage Area.

Section 2.0 describes the site and provides other background information regarding the site. The remainder of this report describes the actions taken to complete the closure of the PCB storage area. Section 3.0 describes the objectives of the *RCP* and the proposed revised cleanup objectives. Section 4.0 provides an overview of the closure process and Section 5.0 provides the detailed description of the closure procedures. Section 6.0 presents the conclusions.

2.0 BACKGROUND

GE's Tonawanda Inspection and Repair Service Center is at 175 Milens Road, in Tonawanda, New York. As shown in Figure 1, the shop is in an urban area that includes some commercial business and other industries. GE built the slab-on-grade building in 1968 and 1969, and expanded the building in 1978. GE uses the service center, which is also known as the Buffalo Service Shop, to repair industrial equipment, such as electric motors, transformers, turbines, pumps, and compressors.

GE generates hazardous wastes during operations at the shop. GE also formerly received liquids, solids, and other articles containing PCBs from customers and other GE facilities for repair or storage prior to shipment for off-site disposal or treatment at facilities with the appropriate permits.

GE managed the PCB wastes in the southeast corner of the building (see Figure 2). GE managed other hazardous wastes in a RCRA Container Storage Area in the east side of the building. The remainder of this section provides background information on each of these two areas, as well as a summary of the RCRA Corrective Actions that GE has conducted at the site.

2.1 USEPA APPROVED COMMERCIAL PCB STORAGE

Prior to August 2000, GE operated an approved Commercial PCB Storage Area inside their Tonawanda service center. GE used the PCB storage area to service PCB-containing equipment and to store PCB wastes generated from their activities at the shop prior to shipping the PCB wastes to appropriately licensed disposal facilities. As shown in Figure 2, the Commercial PCB Storage Area, which was comprised of three areas (PCB work area, PCB container storage area, and PCB drum storage area), was in the southeast corner of the shop.

In 1994, GE deactivated the PCB drum storage area and the northern portion of the work area. The December 15, 1994 letter report (*Deactivation Report*) by ERM that describes the work and certifies the deactivation was included as an attachment to the *RCP*. In their June 9, 1995 approval letter, entitled *Notice of Issuance of Approval of General Electric Company Tonawanda Service Center Tonawanda, New York NYD067539940 As a Commercial Storer of PCB waste*, the USEPA stated that "If an area is not used again for storage of PCB waste, the decontamination activities described in GE's December 15, 1994 report will generally not be required to be repeated for final closure."

Based on discussion with GE, URS understands that GE has not used the northern portion of the PCB work area or the PCB drum storage area for either the handling or storage of PCB wastes since those areas were deactivated in 1994. Therefore, the *Revised Closure Plan* (*RCP*), dated June 28, 2000, which was approved by the USEPA on June 29, 2000, addressed only the approximately 1,400 square foot active PCB container storage area (PCB CSA) shown in Figure 2.

2.2 HAZARDOUS WASTE STORAGE

GE operated a RCRA Container Storage Area (RCRA CSA) in a covered area adjacent to the east side of the Tonawanda service center building (Figure 2) until initiating closure of the unit in 2002. The RCRA CSA was subject to a *373 Permit* issued by NYSDEC and a *Hazardous and Solid Waste Amendments (HSWA) of 1984 Permit* issued by USEPA. The RCRA CSA was closed in general accordance with the NYSDEC approved *Revised RCRA Closure Plan*, dated January 4, 2002. Closure activities were documented in the *RCRA Closure Certification Report*, which was submitted to NYSDEC and USEPA on September 19, 2002. The *373 Permit* also encompasses the Commercial PCB Storage Area because PCBs are managed as hazardous wastes in New York State. Currently, GE is awaiting NYSDEC acceptance of the *RCRA Closure Certification Report*.

2.3 RCRA CORRECTIVE ACTION

In accordance with the terms of the *373 Permit*, GE has begun Corrective Action at the site. Under RCRA, Corrective Actions are to be implemented wherever they are necessary, including areas beyond the boundaries of the facility. Corrective Actions include a RCRA Facility Assessment (RFA), a RCRA Facility Investigation (RFI), and if needed, Corrective Measures. GE completed the RFA in 1988, the RFI in 1998, and the Corrective Measure Study (CMS) in 2000. In a letter dated February 18, 2003, NYSDEC approved the *Revised Corrective Measure Study Final Report*, which was dated July 31, 2001. Based on with conversations with NYSDEC, GE understands that NYSDEC will issue a corrective measures only permit to replace the existing *373 Permit*, which expires June 1, 2006.

3.0 OBJECTIVES

The objective of the *Revised Closure Plan* was to confirm that surfaces at the facility that may have been impacted by GE's operations as a commercial PCB storage facility met the cleanup levels specified in 40 CFR Part 761 Subpart G – PCB Spill Cleanup Policy. Specifically, the cleanup objectives outlined in the *RCP* were:

Media	Location	Cleanup Objective for PCBs
Surfaces	Indoor solid surfaces and high contact outdoor solid surfaces	10 μg/100 cm^2
Surfaces	Indoor vault areas and low-contact, out door impervious solid surfaces	10 μg/100 cm^2
Surfaces	Low-contact , outdoor, impervious solid surfaces	10 μg/100 cm^2 or 100 μg/100 cm^2 and encapsulated
Soil	Less than 10 inches below surface	1 mg/kg
Soil	More than 10 inches below surface	10 mg/kg

As discussed in Section 5.0, GE conducted additional investigations of the shop floor and the paved parking area south of the shop after the results of the initial sampling in the truck bay adjacent to the PCB CSA indicated the presence of PCBs. Based on the distribution of PCBs throughout the shop floor and the parking area, it appears that the PCB impacts are likely attributable to historical poor housekeeping practices at the shop and are not specifically related to releases from the Commercial PCB Storage Area. GE has no record of any spills from the permitted area. Therefore, GE proposes to modify the objectives for the project to allow continued use of the PCB-impacted shop floor as authorized in 40CFR Part 761.30(p) and to allow continued use of the asphalt south of the shop as a low occupancy area (40CFR Part 761.61(a)(4)(i)(B)).

4.0 SCOPE OF WORK

This section describes the scope of work in the *RCP* for closure of the Commercial PCB Storage Area. In addition to providing a summary of the proposed tasks involved in the closure, this section provides descriptions of the sample collection and analyses that were included in the *RCP*.

4.1 SUMMARY OF CLOSURE ACTIVITIES

The scope of the PCB area closure activities defined in the *RCP* included these eight tasks:

- Dispose final waste;
- Clean PCB CSA;
- Collect wipe samples from PCB CSA;
- Collect concrete chip samples from adjacent truck bay and depressed dock;
- Collect asphalt chip samples from transportation corridor;
- Conduct additional investigation to define extent of PCB impacts to transportation corridor;
- Conduct additional investigation to define extent of PCB impacts to shop floor; and
- Dispose closure derived waste.

The actions that GE undertook to conduct these tasks are described in Section 5.0 along with these two additional tasks:

- Clean and coat shop floor with two layers of contrasting colored epoxy; and
- Remove surface asphalt from transportation corridor.

GE retained Marcor Environmental of Rochester, New York to act as the remediation contractor for cleaning the PCB CSA. GE handled disposal of the final stored waste and waste generated during closure activities. GE retained The Pike Company to act as the remediation contractor for cleaning and coating the shop floor and SLC Environmental Services to act as the remediation contractor for removing PCB-containing surface asphalt from the transportation corridor and surrounding parking lot. URS provided construction oversight during the closure activities, conducted the additional investigation activities, and prepared this report.

4.2 SAMPLE COLLECTION, ANALYSIS, AND DOCUMENTATION

In addition to providing construction oversight, URS collected confirmatory wipe samples from the cleaned PCB container storage area and conducted investigations to evaluate the extent of PCB impacts to the shop floor and the transportation corridor. The samples were collected in general accordance with the sample collection procedures and the analytical methods in the *RCP*, except as noted in Section 5.0.

4.2.1 Sampling Protocol

This section describes the protocols listed in the *RCP* for each of the sample types to be collected during closure activities. The *RCP* called for each sample to be assigned a unique sample identification related to the location from which it was collected and sample type. If an obstruction prevented the collection of any sample from a designated location, the location was to be adjusted in the field, and the sample collected as close as practical to the designated location.

The *RCP* called for all sampling equipment to be decontaminated between sampling locations. The core barrel, hand auger, and any other non-disposable sampling equipment was to be washed with liquinox, rinsed with distilled water, then washed with hexane, and rinsed with distilled water.

Wipe Samples

The *RCP* included collection of wipe samples from non-porous surfaces and from epoxy-coated concrete surfaces. Wipe samples were to be collected by framing the surface to be sampled with a ten centimeter by ten centimeter template and systematically wiping the area using a pad moistened with hexane. The solvent-moistened pad was to be wiped twice, once vertically and once horizontally, over the entire area to be sampled. Duplicate wipe samples were to be collected immediately adjacent to the original sampling location. The samples were be submitted to the analytical laboratory under proper chain of custody for PCB analyses.

Chip Samples

The *RCP* included collection of chip samples from non-coated concrete and asphalt surfaces. Chip samples were to be removed from the paved area or from cores drilled through the paved area. The samples were to be crushed and placed in clean bottles provided by the laboratory. The sample bottles were to be capped, labeled, and placed in a cooler for transport under proper chain-of-custody.

Core Samples

If the analytical results from chip samples indicated further investigation was warranted, core samples were to be collected from either concrete or asphalt paved areas. The core sampling procedures described in the *RCP* called for using a coring machine equipped with a diamond edged core barrel to core through solid surfaces. The core barrel would have a minimum diameter of four inches to allow soil samples to be collected through the hole. The core samples were to be split into one-inch intervals at the laboratory. The core barrel was to be decontaminated between sample locations using the procedures outlined above.

Soil Samples

If the analytical results from chip samples, either asphalt or concrete, indicated further investigation was warranted, soil samples would be collected from beneath the impacted surface. Soil samples were to be collected from borings advanced using a hand auger. The borings would be advanced to a maximum of three feet below the base of the slab. Soil samples would be collected at one foot and three feet below the base of the slab. The analyses for the samples collected at three feet below the base of the slab would be held pending the results of the samples from one foot below the slab. Residual soil would be used to backfill the soil boring. The concrete or asphalt surface would be patched.

4.2.2 Analyses

The *RCP* called for the samples to be transferred to containers provided by the analytical laboratory, and submitted under proper chain of custody for PCB analyses. All samples collected during the closure were to be analyzed for PCBs using USEPA Method 8082.

4.2.3 Quality Control and Quality Assurance

The *RCP* called for the collection and analysis of field blanks and duplicate samples for QA/QC purposes. Field blanks were to be collected for each day of sampling. Duplicate samples were to be collected at a rate of one duplicate sample per 20 samples for each type of sample collected.

5.0 CLOSURE ACTIVITIES

This section describes the closure activities that GE has conducted at the site. As discussed below, because PCBs were found to have impacted the shop floor and the paved area south of the shop, the closure activities were substantially more complex than anticipated. The scope of the PCB area closure activities conducted by GE included these ten tasks:

- Task 1 - Dispose final waste;
- Task 2 - Clean PCB CSA, truck bay, and depressed dock;
- Task 3 - Collect wipe samples from PCB CSA;
- Task 4 - Collect concrete chip samples from truck bay and depressed dock;
- Task 5 - Collect asphalt chip samples from transportation corridor;
- Task 6 - Conduct additional investigation to evaluate extent of PCB impacts to transportation corridor;
- Task 7 - Conduct additional investigation to evaluate extent of PCB impacts to shop floor;
- Task 8 - Clean and coat shop floor with two layers of contrasting colored epoxy;
- Task 9 - Remove surface asphalt from transportation corridor; and
- Task 10 - Dispose closure derived waste.

The remainder of this section discusses each of these tasks and notes any procedural exceptions to the approved closure plan.

5.1 TASK 1 – DISPOSE FINAL WASTE

GE personnel handled the disposal of the last waste stored in the PCB CSA.

5.2 TASK 2 - CLEAN PCB CSA, TRUCK BAY, AND DEPRESSED DOCK

On November 14, 2000, Marcor Environmental mobilized to the service shop and began cleaning the PCB container storage area. Between November 15 and 17, 2000, the truck bay adjacent to the PCB CSA and the depressed dock were cleaned. Personnel from the Buffalo, New York URS office were at the shop on November 14, 15, and 17, 2000 to document cleaning activities and collect samples (Task 3).

For each area, Marcor began by vacuuming the area to remove loose dirt. Each area was then pre-washed; all wash fluids were contained and a vacuum was used to pick up the fluids. Next, Marcor applied a capture material (Capsur) and thoroughly scrubbed all surfaces. A specialized industrial soap (Neugenic) was applied and then the area was pressure washed. All fluids were contained and picked up with a vacuum. Waste generated during cleaning activities was drummed for later disposal at an appropriately licensed off-site facility (Task 10).

5.3 TASK 3 – COLLECT WIPE SAMPLES FROM PCB CSA

The PCB CSA was a bermed area with epoxy coated concrete floors. Field observations indicated that the integrity of the floor and the coating were both good. URS collected eleven wipe samples (W-1 through W-11) and one duplicate sample (W-12) from the area on November 15, 2000. The eleven wipe sample locations were selected based on randomly generated numbers. No discretionary samples were collected because field observations did not identify any locations meeting the requirements for discretionary sampling outlined in the *RCP*. Sampling was conducted in accordance with the procedures presented in the *RCP* and summarized in Section 4.0. Figure 4 shows the wipe sample locations.

None of the analytical results for the 12 wipe samples collected from the PCB CSA were greater than the cleanup objective of 10 $\mu g/100\ cm^2$ for PCBs. The analytical results for the wipe samples are summarized in Table 1.

5.4 TASK 4 - COLLECT CONCRETE CHIP SAMPLES FROM TRUCK BAY AND DEPRESSED DOCK

After the initial cleaning activities described in Section 5.2, URS collected samples from the at-grade truck bay adjacent to the PCB CSA and the depressed dock.

5.4.1 At-Grade Truck Bay

The at-grade truck bay adjacent to the PCB CSA is approximately 70 feet by 15 feet. The floor is concrete and was reportedly once coated with epoxy. No evidence of an epoxy coating was noted in November 2000, so the floor was treated as a porous surface. Field observations indicate that the floor had some small cracks but was not heavily cracked. Staining was observed in two areas. Because the concrete floor was no longer coated, chip samples were collected instead of wipe samples. Four chip samples (BCE-1 through BCE-4) were collected from the area on November 17, 2000. Two sample locations (BCE-3 and BCE-4) were selected randomly, and two discretionary samples (BCE-1 and BCE-2) were collected from stained areas. Figure 5 shows the sampling locations.

The four chip samples were analyzed for PCBs, and the analytical results are summarized in Table 2. The analytical results for all four chip samples exceeded the cleanup objective of 1 mg/kg for PCBs. Therefore, in accordance with the *RCP*, additional investigation (Task 7) and remedial measures (Task 8) were conducted in this area.

Sampling was conducted in accordance with the procedures presented in the *RCP* and summarized in Section 4.0 except that the equipment used to collect the chip samples was not rinsed with hexane. Equipment rinsate blank results are summarized in Table 3. As shown in Table 3, PCBs were not detected in the equipment rinse blank (R-1). Thus, URS does not believe using alternate decontamination procedures is a substantive variance from the procedures in the *RCP*.

5.4.2 Depressed Loading Dock

The depressed loading dock is approximately 14 feet wide by 50 feet long. The floor is concrete and was found to be heavily cracked and stained. Several of the cracks were deep and fairly major. Because the floor was not epoxy coated, concrete chip samples were collected. Six samples (BCW-1 through BCW-6), including one duplicate sample (BCW-6), were collected from the depressed dock on November 17, 2000. Three discretionary samples (BCW-1, BCW-3, and BCW-5) were collected from stained areas and the other two sample locations were selected randomly. Sampling was conducted in accordance with the procedures presented in the *RCP* and summarized in Section 4.0 except that the equipment used to collect the chip samples was not rinsed with hexane. Figure 6 shows the sampling locations.

The six concrete chip samples were analyzed for PCBs, and the analytical results are summarized in Table 2. Equipment rinsate blank results are summarized in Table 3. As shown in Table 3, PCBs were not detected in the equipment rinse blank (R-1). Thus, URS does not believe utilizing alternate decontamination procedures is a substantive variance from the procedures in the *RCP*. The analytical results for five of the six concrete chip samples exceeded the cleanup objective of 1 mg/kg for PCBs. Therefore, in accordance with the *RCP*, additional investigation (Task 7) and remedial measures (Task 8) were undertaken for this area.

5.5 TASK 5 - COLLECT ASPHALT CHIP SAMPLES FROM TRANSPORTATION CORRIDOR

The transportation corridor is an "L" shaped paved area that is approximately 45 feet wide. The corridor extends approximately 295 feet east from the entrance gate on Milens Road to the truck bay adjacent to the PCB CSA. The transportation corridor is part of a larger paved area that extends from the south wall of the building south to the fence line.

On November 17, 2000 URS collected six asphalt chip samples (AC-1 through AC-6) from the transportation corridor. The sample locations were approximately 60 feet apart. Sampling was conducted in accordance with the procedures presented in the *RCP* except that the equipment used to collect the chip samples was not rinsed with hexane. Figure 7 shows the sampling locations.

The six asphalt chip samples were analyzed for PCBs and the analytical results are summarized in Table 4. Equipment rinsate blank results are summarized in Table 3. As shown in Table 3, PCBs were not detected in the equipment rinse blank (R-1). Thus, URS does not believe using alternate decontamination procedures is a substantive variance from the procedures in the *RCP*. Five of the six asphalt samples had concentrations of PCBs greater than the cleanup objective of 1 mg/kg. Therefore, in accordance with the *RCP*, additional investigation (Task 6) and remedial measures (Task 9) were undertaken for this area.

5.6 TASK 6 - CONDUCT ADDITIONAL INVESTIGATION TO EVALUATE EXTENT OF PCB IMPACTS TO TRANSPORTATION CORRIDOR

GE and URS developed and implemented a sampling plan to evaluate the extent of PCB impacts to pavement south of the service shop. The plan included:

- Establishing a 30-foot by 30-foot grid over the pavement south of the shop.
- Collecting eleven asphalt chip samples and one duplicate sample for PCB analysis from the grid nodes on either side of the transportation corridor.
- Coring the pavement near the locations where the two highest concentrations of PCBs were detected in the initial sampling effort to evaluate the depth of impact and slicing the cores into one-inch wafers for PCB analysis.
- Collecting soil samples for PCB analysis from the 0- to 1-foot and 1- to 2-foot depth intervals at each core location.

On May 23 and 24, 2001, URS established the grid and collected the additional asphalt samples. Samples were collected in general accordance with the *RCP,* except that the soil samples were collected with a JMC Earth Probe rather than a hand auger and the equipment used to collect the samples was not rinsed with hexane. For the asphalt core samples and soil samples, the shallower samples were analyzed, and the deeper samples were archived pending the results of the shallower samples. The sampling locations are shown in Figure 7, and the sampling results are summarized in Tables 4 and 5. Equipment rinsate blank results are summarized in Table 3. As shown in Table 3, PCBs were not detected in the rinse blank (TC-AC-RB). Thus, URS does not believe using alternate decontamination procedures is a substantive variance from the procedures in the *RCP*.

As shown in Table 4, PCBs were detected in 11 of the 12 asphalt chip surface samples (TC-grid number-grid letter-AC). PCB concentrations exceeded the cleanup objective of 1 mg/kg at eight of the surface sampling locations.

On May 23, 2001, URS cored the asphalt near the two locations with the highest concentration of PCBs from the initial sampling. The eight-inch thick asphalt cores were sliced into one-inch thick wafers. Four asphalt samples from each core that represented the one-inch to five-inch depths were submitted for PCB analysis, and the deeper samples were archived. As shown in Table 5, PCBs were not detected in these eight samples (TC-11.5-C-5-AC-1-2" to 4-5" and TC-2.5-A-5-AC-1-2" to 4-5"). Four soil samples (TC-11.5-C-5-AC-0-1'and 1-2', TC-11.5-C-5-AC-0-1'-DUP and TC-2.5-A-5-AC-0-1') collected beneath the asphalt were also submitted for PCB analysis. As shown in Table 5, PCBs were not detected in the soil samples.

After evaluating the analytical results and potential remedial measures, GE elected to address the PCB impacts to the paved area south of the building by removing and replacing the top inch of asphalt. In accordance with the *RCP*, a plan was developed and reviewed with USEPA. Section 5.9 (Task 9) describes the remedial actions conducted in and near the transportation corridor.

5.7 TASK 7 - CONDUCT ADDITIONAL INVESTIGATION TO EVALUATE EXTENT OF PCB IMPACTS TO SHOP FLOOR

GE conducted additional investigations to evaluate the extent of the PCB impacts to the shop floor. In all, seven rounds of sampling were conducted between November 2000 and March 2004. In general, sampling began adjacent to the at-grade truck bay and stepped out by extending the 10-foot by 10-foot grid that was used for sampling the truck bay. Figure 8 shows the sampling locations. In general, samples were assigned a unique identification according to their location (TB-grid number-grid letter-sample type-depth, if applicable or DD-grid number-grid letter-sample type-depth, if applicable).

The investigation of the shop floor included collection of concrete chip samples and wipe samples from the surface of the shop floor, concrete cores through the floor slab, and soil samples from beneath the floor slab. Sampling was conducted in general accordance with the procedures specified in the *RCP* and summarized in Section 4.0 except that the non-disposable equipment used to collect the samples was not rinsed with hexane. In addition, the method to procure the soil samples from beneath the concrete slab was modified in the field, as described further in the next section. The samples were submitted to Severn Trent Laboratories of Amherst, New York for PCB analysis. Tables 2, 6, and 7 summarize the sample analytical results and Table 3 summarizes the equipment rinsate blank results. As shown in Table 3, PCBs were not detected in the equipment rinse blanks (TB-SS-RB, TB-CC-RB, and RBI). Thus, URS does not believe using alternate decontamination procedures is a substantive variance from the procedures in the *RCP*. Figure 5 shows the sampling locations in the at-grade truck bay, Figure 6 shows the sampling locations in the depressed dock, and Figure 8 shows the comprehensive shop floor sampling locations.

Subsurface Samples

In May 2001, during the second round of sampling, the concrete slab was cored at two locations (TB-3-A and TB-4-F) in the truck bay adjacent to the PCB CSA (Figure 5) and at two locations (DD-1-E and DD-2-B) in the depressed dock (Figure 6). The seven-inch thick concrete cores were sliced into one-inch thick wafers. Four concrete samples from each core that represented the one-inch to five-inch depths were submitted for PCB analysis, and the deeper samples were archived. As shown in Table 6, PCBs were detected in two of the eight subsurface concrete samples collected from the truck bay. PCBs were not detected in the subsurface concrete samples collected from the depressed dock.

URS also collected samples from beneath the concrete slabs in the truck bay and the depressed dock area. The samples (TB-3-A-SS-7-8", TB-4-F-SS-7-8", DD-1-E-SS-7-8", and DD-2-B-SS-7-8") were comprised of gravel from immediately below the slab.

Deeper soil samples could not be collected because the gravel subbase beneath the concrete surrounding the core hole was not stable and collapsed into the hole. Due to the incohesive nature of the gravel, the samples were collected with a shop vac. As shown in Table 6, PCBs were detected in one of the two gravel samples collected from beneath the truck bay at an estimated value less than the method detection limit and less than the cleanup standard of one milligram per kilogram. PCBs were not detected in the two samples collected from beneath the depressed dock.

Surface Samples

Between May 2001 and March 2004, URS collected 47 concrete chip samples, 25 concrete wipe samples, and 5 floor tile wipe samples from the at-grade truck bay and the shop floor. The samples were analyzed for PCBs. Figure 8 shows the sampling locations. As shown on Tables 2 and 7, PCBs were detected in all of the 77 samples collected from the truck bay and shop floor. Of these additional samples, all 47 of the concrete chip samples contained concentrations of PCBs that exceeded the cleanup objective of one milligram per kilogram, 21 of the 25 concrete wipe samples contained concentration of PCBs that exceeded the cleanup objective of 10 micrograms per 100 square centimeters, and two of the 5 floor tile wipe samples contained concentration of PCBs that exceeded the cleanup objective of 10 micrograms per 100 square centimeters.

Based on the results, URS concluded that the PCB impacts to the shop floor stemmed from overall historical poor housekeeping practices and did not relate directly to the PCB CSA. After evaluating the options to remediate the shop floor, GE elected to use the double wash double rinse procedures followed by double epoxy coating of the floor in contrasting colors outlined in TSCA for continued use of porous surfaces impacted by PCBs (40CFR Part 761.30(p)). This approach was selected because it would be less disruptive to shop operations than removing and replacing the floor slab or scarifying the impacted surface concrete and replacing the surface. The remedial activities undertaken for the shop floor and the depressed dock area are described in Section 5.8.

5.8 TASK 8 - CLEAN AND COAT SHOP FLOOR WITH TWO LAYERS OF CONTRASTING COLORED EPOXY

As discussed above, GE elected to employ the double wash double rinse, then epoxy coating of the shop floor with two contrasting colors, and subsequent labeling of the floor with the PCB mark to isolate the PCBs in the shop floor in accordance with 40 CFR 761.30(p). The remedial work was conducted in accordance with the procedures outlined in TSCA. GE engaged The Pike Company (Pike) of Rochester, New York as the contractor for remediating the shop floor. Pike engaged AAC Contracting, Inc. of Rochester, New York as their subcontractor for washing of the floor and abatement of the PCB impacted asbestos floor tiles from two rooms adjacent to the shop floor. URS provided oversight of the remedial activities. URS engaged Sienna Environmental Technologies, LLC of Blasdell, New York to oversee the remediation of the asbestos containing floor tile and conduct air monitoring. The asbestos abatement was conducted in accordance with State of New York Official Compilation of Codes, Rules and Regulations Title 12 Part 56.

The areas addressed by this task included:

- The shop floor; work, storage, and locker room areas with concrete flooring contiguous to the shop;
- The sand blast room and adjacent storage room with asbestos containing tile, which are adjacent to the shop;
- An alcove adjacent to the former PCB work area; and
- The depressed dock.

Each of these areas is shown on Figure 2. Concrete in poor condition in the southern rail bay and along the wall of the depressed dock was removed and repaired. Additionally, the shop elected to epoxy coat the former PCB CSA, from which they had removed the surrounding berm, to match the rest of the floor.

The shop was divided into five sections in order to implement the remedial measures while minimizing impacts to shop operations. The cleaning and coating of the shop floor was conducted from December 2003 through May 2004. Each section took approximately four to five weeks to complete, with approximately half of the time being used by shop employees to relocate equipment and the other half of the time being used for remedial measures. All waste generated during implementation of the remedial measure was containerized and disposed at properly licensed off-site facilities (Task 10).

The remainder of this section describes the cleaning procedures, coating procedures, additional work for the asbestos abatement areas, and measures used for the steel grounding plates that are embedded in the shop floor. Figure 9 shows the areas at the shop that were epoxy coated. As per 40 CFR 761.30(p)(1)(iii), inaccessible areas (beneath large machinery or bolted-in-place equipment) were not coated.

Cleaning Procedures

Cleaning procedures were conducted in accordance with 40 CFR Subpart S. Prior to cleaning the floor, the work area was isolated with polyethylene sheeting and absorbent booms. Washing operations were performed in Modified Level D personal protective equipment. The initial wash was performed using Fingers Lake Industrial Cleaner, which is comprised of natural citrus and non-chlorinated d-limonene. The cleaner was sprayed or poured onto the floor surface until each area of the floor was completely covered for at least one minute. Floor scrubbing machines were then used to scrub each portion of the floor for at least one minute. After scrubbing, the floor was swept using a squeegee and the citrus cleaner was collected using a wet/dry vacuum. The second wash was performed using Senitnel Envirowash 850. The floor was again scrubbed using a floor scrubbing machine. Excess wash fluid was swept up using a squeegee and a wet/dry vacuum. Waste wash fluid and equipment decontamination fluid were placed into a 1,000-gallon polyethylene tank for later disposal at a properly licensed facility. Solid waste generated from the cleaning was contained in 55-gallon drums. Section 5.10 describes the waste disposal.

The paint spray booth was cleaned separately from the other portions of the floor. The wash fluids from this area were drummed separately. Due to the potential presence of VOCs and metals on the floor from the paints used in this area, the wash fluids needed to be segregated and sampled to determine if they were a RCRA characteristic hazardous waste.

Coating Procedures

Coating procedures were conducted in accordance with 40 CFR 761.30(p)(1)(iii)(A). In general, the floor was prepared, primed, coated with a quarter-inch base or matrix coat of tan epoxy, prepared for the finish coat, and then top coated with a thinner layer of light grey epoxy. However, portions of the floor received different applications of epoxy based on their use. As per 40 CFR 761.30(p)(1)(ii)(B), a minimum of 24 hours elapsed between cleaning and coating the floor. This section describes the general coating procedures that were used on the majority of the floor, and areas with variances in the coating procedures are described in the following section.

Prior to epoxy coating the floor, the surface of the floor was roughened so the epoxy would bind securely with the concrete. Self-contained shot blasters were used to roughen open areas of the floor and hand grinders were used for the edges of the floor and around stationary shop machines and columns. Poly sheeting was placed over all of the non-moveable machines prior to shot blasting. Each blasting machine was attached to an industrial vacuum that collected the dust and waste shot blast. Each hand sander was connected to a wet dry vacuum that collected the dust generated during sanding. Cracks in the concrete and joints in the slab were vacuumed to gather dust that accumulated during the blasting and grinding step. Solid waste generated during this step was contained in 55-gallon drums for later disposal at a properly licensed facility.

After roughening the concrete surface, a primer was applied to the floor with 12-inch rollers. The primer was light grey in color when freshly mixed but became clear upon application. Immediately following the application of the primer, a thin coat of silica was scattered onto the primer to help seal the floor.

The base coat of epoxy was a matrix or trowel-on coat, which was a quarter-inch thick when finished. This coat consisted of a three to one mixture of Florock System 4750 High Speed Trowel Mix Clear Epoxy Part and Florock System 4750 High Speed Mortar Resin Activator Part B, plus silica sand. The matrix coat had the visual consistency of brown sugar and was tan in color. The mixture was shoveled onto the floor and a screed box and board were used to achieve a three-eighths of an inch of the matrix coat. Power troweling machines were used on the open portions of the shop floor to compress the matrix coat to one quarter-inch thick. The matrix coat was hand troweled in areas that the power machines could not access, such as along edges, equipment, and columns.

The locker room and file room, which are expected to only receive foot traffic and no heavy loads, did not receive this quarter-inch thick matrix coat. Instead, these areas received two layers of the top coat or finish coat epoxy in contrasting colors.

After the base epoxy coat was placed, the floor was prepared for the top coat or finish coat of epoxy. The surface of the floor was sanded to provide a rough surface that would aid the finish coat in adhering to the matrix coat. A double disk floor grinder was used on open areas of the shop floor and a single disk floor grinder was used in tighter spaces. A hand held grinder was used along walls and the base of machinery or columns. A circular saw was used to cut finish edges along the boundary between sections. Dust and epoxy fragments were collected using wet/dry vacuums. The entire area was vacuumed prior to applying the finish coat.

The finish coat was a 10 to 12 millimeter thick epoxy mixture consisting of a three to one mixture of Florock System 4869/4760 Stipple Part A and Florock System 4860 Stipple Part B, plus Florock epoxy colorant. The finish coat was applied to the floor with hand squeegees and then backrolled with rollers.

After the coating was completed in a section, the plastic sheeting that provided work area containment and protection of the non-movable equipment was removed and drummed for later disposal at properly licensed off-site facilities (Task 10).

After completion of the epoxy coating in all the sections, the shop floor was washed and the stripes marking aisle ways and other features were repainted. Decals with the PCB mark specified in 40CFR Part 761.45 were applied to the floor near each entrance to the shop area. The decals were positioned such that they are visible from the entrance but will not receive heavy foot or vehicle traffic.

Variances to General Coating Procedure

Portions of the shop floor received slightly different treatment than the general procedures described above. These variances include:

- Paint Spray Booth – The waste from cleaning and shotblasting the paint spray booth floor was separated from the other remedial waste pending waste characterization.
- Locker rooms – Two contrasting colors (light grey beneath darker grey) of the roll on epoxy were placed instead of the matrix coat followed by the roll on coat.
- File room – Two contrasting colors (light grey beneath darker grey) of the roll on epoxy were placed instead of the matrix coat followed by the roll on coat.
- Spray Booths – The large spray booth initially received the regular floor treatment. However, because the floor became slippery when wet, the large spray booth was recoated with a larger volume of silica sand mixed into the top coat. The small spray booth received the matrix coat followed by a top coat with additional silica sand.
- Southern Rail Road Tracks – The concrete between the rails, which was in very poor shape, was partially removed and repaired. The removed concrete was drummed and disposed with the other remedial waste (Task 10).

- Depressed Dock – The west wall of the depressed dock, on which the concrete was degraded, was repaired. The removed concrete was drummed and disposed with the other remedial waste (Task 10). Additionally, the walls of the depressed dock received a base coat of medium grey epoxy and a top coat of dark grey epoxy to provide a better visual difference between the walls of the depressed dock and the floor of the shop.
- Storage Room Adjacent to Sandblast Room – PCB-impacted asbestos containing tile and asbestos containing mastic were removed prior to addressing the room with general procedures described above.
- Sandblast Room – PCB-impacted asbestos containing tile was removed. The underlying concrete floor was not impacted by PCBs greater than 10 micrograms per 100 square centimeters and, therefore, was not cleaned and epoxy coated.
- PCB CSA – The shop had removed the concrete berm from the PCB container storage area after the area was documented to be clean to allow the space to be used for other purposes. This area received a top coat of the light grey epoxy so that it would match the rest of the shop floor.

In addition, the epoxy top coat placed near entrances and truck bay doors, which may become wet during normal operations, received a non-skid top coat. The compressed gas storage area received a specially mixed top coating to reduce static.

Asbestos Abatement

The floors in two of the side room work areas at the shop were covered with asbestos-containing vinyl tile that was impacted with PCBs. The tiles in the sandblast room and adjacent storage room were in poor shape with the underlying concrete slab exposed in several locations. These areas underwent asbestos remediation in accordance with State of New York Official Compilation of Codes, Rules and Regulations Title 12 Part 56, which governs asbestos.

The asbestos abatement work was conducted by Pike's subcontractor AAC. URS engaged Sienna Environmental Technologies, LLC of Blasdell, New York to serve as project monitor and collect air samples. An asbestos building inspector from URS was present to observe. The waste generated was bagged in accordance with asbestos waste handling regulations and was subsequently drummed to meet TSCA waste storage requirements. The waste was disposed as PCB-containing asbestos waste (Task 10).

After the asbestos abatement portion of the work was completed, the storage room, which has PCB-impacted concrete, was double washed and double epoxy coated in accordance with the general procedures described above. The sand blast room, which did not have PCB impacted concrete greater than 10 $\mu g/100\ cm^2$ (wipe sample S1-FLOORWIPE2), was not double washed or epoxy coated. The traces of yellow mastic that remained in the sandblast room after the asbestos remediation were sampled and tested and found to be free of asbestos (asbestos sample 0517-GE-1).

Grounding Plates

As shown on Figure 2, steel grounding plates with relatively smooth uncoated surfaces are embedded into the shop floor at three locations. The two plates in the central area of the shop are eight feet four inches by six feet nine inches. The grounding plate in the southwest portion of the shop is approximately four feet by four feet. Because the shop periodically uses these plates to test electrical equipment, the plates needed to be maintained in usable condition and not coated with epoxy. Therefore, the plates were washed and wipe samples were collected to document that the plates met the less than 10 $\mu g/100\ cm^2$ clean up standard for impervious surfaces. The grounding plates were double washed along with the concrete floor. When the first grounding plate was encountered during the floor work, the grounding plate was double washed when the floor was washed. The next day a wipe sample (S4-GRNDPLT-WP-032304) was collected from the grounding plate for PCB analysis and the results indicated PCBs were still present. Therefore, all three grounding plates were double washed again as a separate task during the final washing of the shop floor. A wipe sample was then collected from each of the three grounding plates for PCB analysis. The confirmatory PCB wipe sampling results indicate that all three grounding plates have less than 10 $\mu g/100\ cm^2$ PCBs. The grounding plate confirmatory wipe results are summarized in Table 8 and Figure 8.

5.9 TASK 9 – REMOVE SURFACE ASHPALT FROM TRANSPORTATION CORRIDOR

In December 2004, GE retained SLC Environmental Services (SLC) of Lockport, New York to remove the top one-inch of pavement in the transportation corridor and adjacent areas that contained PCBs at concentrations greater than one milligram per kilogram. URS provided oversight of the asphalt removal and collected confirmatory post-removal samples. SLC subcontracted Ken Young Paving to restore the pavement. GE contacted Mr. Jim Reidy of the USEPA to discuss the planned removal on December 1, 2004.

The asphalt removal was conducted on December 2, 3, and 4, 2004. SLC removed at least one-inch of asphalt from the area south of the shop for ease of implementation and to provide a more uniformly paved area for the service center. Asphalt was removed to the extent practicable along the east and south fences where oversized equipment was stored and near the pressure plate for the facility gate. Figure 7 shows the removal area. While most of the asphalt contained concentrations of PCBs less than 10 mg/kg, the two areas (Figure 7) where PCBs were previously detected at elevated concentrations (greater than 37 mg/kg) were removed separately, and the asphalt was segregated for disposal as a TSCA waste (Task 10). For most of the area, an asphalt ripper mounted on a bobcat loader was used to remove the top one-inch of asphalt. For the southeast corner, where the asphalt was heavily cracked, a bobcat loader was used to remove and scoop up the upper layer of asphalt.

URS collected confirmatory samples at approximately the same 11 locations where PCBs were previously detected at concentrations greater than one milligram per kilogram during the investigations (Tasks 5 and 6). The samples were analyzed PCBs by USEPA

Method 8082. The results of the confirmatory sample PCB analysis are summarized in Table 9. At six of the 11 locations, primarily in the southeast portion of the parking lot, the samples representing the remaining asphalt contained PCBs at concentrations greater than the cleanup objective of one milligram per kilogram.

Due to the impending closure of asphalt batch plants for the winter, GE elected to lay approximately one and a half inches of pavement over the removal area. The pavement was placed on December 8 to 9, 2004. Considering that this area is used for parking and equipment storage only, it meets the TSCA definition of a low occupancy area. Per 40 CFR 761.61(a)(4)(i)(B), the clean-up level for low occupancy areas is 25 mg/kg. The majority of sample results from the parking area are less than 8 mg/kg PCBs, with one location having a concentration of 24 mg/kg. Therefore, the area meets the cleanup objectives for a low occupancy area.

5.10 TASK 10 - DISPOSE CLOSURE DERIVED WASTE

Closure derived waste was generated during these four phases of the project:

- Cleaning of the PCB CSA, adjacent at-grade truck bay, and depressed dock in November 2000;
- Abatement of the PCB-impacted asbestos floor tile in May 2004;
- Cleaning and epoxy coating of the shop floor from December 2003 through May 2004; and
- Removal of the PCB-impacted surface pavement in the transportation corridor in December 2004.

All waste generated was disposed by GE in accordance with state and federal regulations at appropriately licensed off-site disposal facilities. Copies of waste manifests will be included in the final closure report.

6.0 CONCLUSIONS

The bermed PCB container storage area at GE's Tonawanda Service and Inspection Center has been closed in accordance with the USEPA-approved *RCP*. The shop floor and pavement south of the shop have been impacted by PCBs from overall poor historical housekeeping practices, and impacts in these areas are not directly related to releases from the Commercial PCB Storage Area.

Impacts to the shop floor have been addressed in accordance with the procedures described in TSCA for continued use of porous surfaces (40 CFR Part 761.30(p)) by double washing the shop floor followed by application of a double coating of epoxy in contrasting colors and labeling the floor with the ML mark.

Results of the investigation of the paved area south of the shop building indicated PCB impacts were limited to the pavement surface and a plan to remove the PCB-impacted surface asphalt was developed and reviewed with USEPA. During the remedial effort, PCBs were found beneath the top inch of pavement. These impacts are likely attributable to historical poor housekeeping practices on previously exposed layers of asphalt. The paved area is enclosed by a fence and is used for employee parking and storage of equipment.

The levels remaining in the parking area of the shop meet the cleanup levels for low occupancy area, as defined in 40 CFR 761.61(a)(4)(i)(B). Due to the technical impracticability of achieving the cleanup objectives laid out in the RCP at an active facility, GE elected to address the historical contamination on the shop floor in accordance with 40 CFR 761.30(p) – continued use of porous surfaces contaminated with PCBs. These cleanup activities are consistent with TSCA regulations, but were not specifically outlined as options in the *Revised Closure Plan*. GE and URS request a modification to the objectives of the *RCP* to incorporate the actions taken to address historical PCB impacts at the facility.

TABLE 1
PCB RESULTS FOR WIPE SAMPLES
FROM THE PCB STORAGE AREA

GE ENERGY
TONAWANDA, NEW YORK

Sample ID	Sample Date	Media	Sample Description	Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Total PCBs
W-1	11/15/2000	Epoxy	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	1.7	1.7
W-2	11/15/2000	Epoxy	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	2.7	2.7
W-3	11/15/2000	Epoxy	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	1.1	1.1
W-4	11/15/2000	Epoxy	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	1.5	1.5
W-5	11/15/2000	Epoxy	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	6.0	6.0
W-6	11/15/2000	Epoxy	Surface Wipe	<0.50	<0.50	<0.50	2.9	<0.50	<0.50	4.2	7.1
W-7	11/15/2000	Epoxy	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	1.8	1.8
W-8	11/15/2000	Epoxy	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	1.4	1.4
W-9	11/15/2000	Epoxy	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	10	10
W-10	11/15/2000	Epoxy	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	2.3	2.3
W-11	11/15/2000	Epoxy	Surface Wipe	<0.50	<0.50	<0.50	1.4	<0.50	<0.50	3.8	5.2
W-12 (DUP of W-7)	11/15/2000	Epoxy	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	1.9	1.9

Notes:

1 - All units are micrograms per 100 square centimeters ($\mu g/100cm^2$).

2 - Polychlorinated Biphenyls (PCBs) were analysed by USEPA method 8082 by Severn Trent Laboratories of Amherst, New York.

TABLE 2
PCB RESULTS FOR CONCRETE SURFACE CHIP SAMPLES

GE ENERGY
TONAWANDA, NEW YORK

Sample ID (Corresponding Grid ID)	Date	Media	Sample Description	Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Total PCBs
BCE-1 (TB-3-A-CC)	11/17/2000	Concrete Chip	Surface	<5.5	<5.5	<5.5	<5.5	<5.5	48	110	158
BCE-2 (TB-3-D-CC)	11/17/2000	Concrete Chip	Surface	<2.1	<2.1	<2.1	<2.1	<2.1	21	39	60
BCE-3 (TB-3-E-CC)	11/17/2000	Concrete Chip	Surface	<4.9	<4.9	<4.9	<4.9	<4.9	27	64	91
BCE-4 (TB-4-F-CC)	11/17/2000	Concrete Chip	Surface	<4.3	<4.3	<4.3	<4.3	<4.3	48	79	127
BCW-1 (DD-2-A-CC)	11/17/2000	Concrete Chip	Surface	<0.50	<0.50	<0.50	<0.50	<0.50	0.42J	0.76	1.18
BCW-2 (DD-2-B-CC)	11/17/2000	Concrete Chip	Surface	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	ND
BCW-3 (DD-2-C-CC)	11/17/2000	Concrete Chip	Surface	<0.50	<0.50	<0.50	<0.50	<0.50	1.3	2.4	3.7
BCW-4 (DD-1-D-CC)	11/17/2000	Concrete Chip	Surface	<0.50	<0.50	<0.50	<0.50	<0.50	3.8	6.8	10.6
BCW-6 (DD-1-D-CC DUP)	11/17/2000	Concrete Chip	Surface	<0.51	<0.51	<0.51	<0.51	<0.51	7.1	13	20.1
BCW-5 (DD-1-E-CC)	11/17/2000	Concrete Chip	Surface	<1.9	<1.9	<1.9	<1.9	<1.9	12	23	35
TB-3-H-CC	5/24/2001	Concrete Chip	Surface	<4.0	<4.0	<4.0	<4.0	<4.0	59	71	130
TB-3-H-CC-DUP	5/24/2001	Concrete Chip	Surface	<23	<23	<23	<23	<23	94	100	194
TB-3-I-CC	5/24/2001	Concrete Chip	Surface	<2.3	<2.3	<2.3	<2.3	<2.3	42	57	99
TB-4-H-CC	5/24/2001	Concrete Chip	Surface	<2.0	<2.0	<2.0	<2.0	<2.0	43	59	102
TB-4-I-CC	5/24/2001	Concrete Chip	Surface	<20	<20	<20	<20	<20	98	160	258
TB-5-H-CC	5/24/2001	Concrete Chip	Surface	<1.2	<1.2	<1.2	<1.2	<1.2	22	33	55
TB-5-I-CC	5/24/2001	Concrete Chip	Surface	<11	<11	<11	<11	<11	33	43	76
DD-1-A-CC	5/24/2001	Concrete Chip	Surface	<5.0	<5.0	<5.0	<5.0	<5.0	1.6	2	3.6
DD-1-B-CC	5/24/2001	Concrete Chip	Surface	<5.0	<5.0	<5.0	<5.0	<5.0	0.92	1.2	2.12
DD-2-D-CC	5/24/2001	Concrete Chip	Surface	<5.0	<5.0	<5.0	<5.0	<5.0	8.2	14	22.2
DD-2-E-CC	5/24/2001	Concrete Chip	Surface	<5.0	<5.0	<5.0	<5.0	<5.0	8.4	11	19.4
TB-5-A-CC	5/25/2001	Concrete Chip	Surface	<11	<11	<11	<11	<11	98	180	278
TB-5-B-CC	5/25/2001	Concrete Chip	Surface	<3.9	<3.9	<3.9	<3.9	<3.9	53	100	153
TB-5-C-CC	5/25/2001	Concrete Chip	Surface	<4.0	<4.0	<4.0	<4.0	<4.0	76	130	206
TB-5-D-CC	5/25/2001	Concrete Chip	Surface	<1.2	<1.2	<1.2	<1.2	<1.2	25	31	56
TB-5-E-CC	5/25/2001	Concrete Chip	Surface	<11	<11	<11	<11	<11	56	77	133
TB-5-F-CC	5/25/2001	Concrete Chip	Surface	<0.50	<0.50	<0.50	<0.50	<0.50	9.9	11	20.9
TB-5-G-CC	5/25/2001	Concrete Chip	Surface	<0.88	<0.88	<0.88	<0.88	<0.88	16	17	33
TB-2-A-CC	5/25/2001	Concrete Chip	Surface	<0.50	<0.50	<0.50	<0.50	<0.50	3.2	4	7.2
TB-1-K-CC	10/12/2001	Concrete Chip	Surface	<2.4	<2.4	<2.4	<2.4	<2.4	58	58	116
TB-4-Q-CC	10/12/2001	Concrete Chip	Surface	<10	<10	<10	<10	<10	48	64	112
TB-5-K-CC	10/12/2001	Concrete Chip	Surface	<2.0	<2.0	<2.0	<2.0	<2.0	30	38	68
TB-7-A-CC	10/12/2001	Concrete Chip	Surface	<4.1	<4.1	<4.1	<4.1	<4.1	40	54	94
TB-7-A-CC DUP	10/12/2001	Concrete Chip	Surface	<1.1	<1.1	<1.1	<1.1	<1.1	18	22	40
TB-7-C-CC	10/12/2001	Concrete Chip	Surface	<0.50	<0.50	<0.50	<0.50	<0.50	6.9	8.4	15.3
TB-7-E-CC	10/12/2001	Concrete Chip	Surface	<0.98	<0.98	<0.98	<0.98	<0.98	18	23	41

TABLE 2
PCB RESULTS FOR CONCRETE SURFACE CHIP SAMPLES

GE ENERGY
TONAWANDA, NEW YORK

Sample ID (Corresponding Grid ID)	Date	Media	Sample Description	Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Total PCBs
TB-7-G-CC	10/12/2001	Concrete Chip	Surface	<1.2	<1.2	<1.2	<1.2	<1.2	**16**	**22**	**38**
TB-7-I-CC	10/12/2001	Concrete Chip	Surface	<4.8	<4.8	<4.8	<4.8	<4.8	**25**	**37**	**62**
TB-7-K-CC	10/12/2001	Concrete Chip	Surface	<2.4	<2.4	<2.4	<2.4	<2.4	**41**	**52**	**93**
TB-9-Q-CC	10/12/2001	Concrete Chip	Surface	<11	<11	<11	<11	<11	**40**	**59**	**99**
TB-14-G-CC	10/12/2001	Concrete Chip	Surface	<0.17	<0.17	<0.17	<0.17	<0.17	**2.5**	**2**	**4.5**
TB-14-L-CC	10/12/2001	Concrete Chip	Surface	<4.1	<4.1	<4.1	<4.1	<4.1	**25**	**33**	**58**
TB-14-Q-CC	10/12/2001	Concrete Chip	Surface	<2.0	<2.0	<2.0	<2.0	<2.0	**24**	**35**	**59**

Notes:
1 - All units are milligram per kilogram (mg/kg).
2 - Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082 by Severn Trent Laboratories of Amherst, New York.
3 - A "J" indicates an estimated value less than the method detection limit.
4 - A "ND" indicates the parameter was not detected above method detection limits.
5 - Results in bold print are equal to or above the cleanup objective of 1 mg/kg.

TABLE 3
PCB RESULTS FOR EQUIPMENT RINSATE BLANKS

GE ENERGY
TONAWANDA, NEW YORK

Sample ID	Date	Sample Description	Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Total PCBs
R-1	11/17/2000	Equipment Rinsate Blank	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	ND
TB-SS-RB	5/23/2001	Equipment Rinsate Blank	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	ND
TC-AC-RB	5/24/2001	Equipment Rinsate Blank	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	ND
TB-CC-RB	5/25/2001	Equipment Rinsate Blank	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	ND
RBI	10/12/2001	Equipment Rinsate Blank	<0.48	<0.48	<0.48	<0.48	<0.48	<0.48	<0.48	ND
EB-120204	12/2/2004	Equipment Rinsate Blank	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	<0.47	ND
EB-120304	12/3/2004	Equipment Rinsate Blank	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	ND
EB-120404	12/4/2004	Equipment Rinsate Blank	<0.48	<0.48	<0.48	<0.48	<0.48	<0.48	<0.48	ND

Notes:

1 - All units are micrograms per liter (µg/l).

2 - Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082 by Severn Trent Laboratories of Amherst, New York.

3 - A "ND" indicates the parameter was not detected above method detection limits.

TABLE 4
PCB RESULTS FOR ASPHALT SURFACE CHIP SAMPLES COLLECTED IN 2000 & 2001

GE ENERGY
TONAWANDA, NEW YORK

Sample ID	Date	Media	Current Status	Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Total PCBs
AC-1	11/17/2000	Asphalt Chip	Surface Removed in 2004	<12	<12	<12	<12	<12	**120**	**360**	**480**
AC-2	11/17/2000	Asphalt Chip	Surface Removed in 2004	<0.50	<0.50	<0.50	<0.50	<0.50	0.72	**1.7**	**2.42**
AC-3	11/17/2000	Asphalt Chip	Surface Removed in 2004	<0.99	<0.99	<0.99	<0.99	<0.99	**9.1**	**28**	**37.1**
AC-4	11/17/2000	Asphalt Chip	Surface Removed in 2004	<0.50	<0.50	<0.50	<0.50	<0.50	**1.7**	**2.2**	**3.9**
AC-5	11/17/2000	Asphalt Chip	Surface Removed in 2004	<0.50	<0.50	<0.50	<0.50	<0.50	0.68	0.64	**1.32**
AC-6	11/17/2000	Asphalt Chip	Surface Removed in 2004	<0.50	<0.50	<0.50	<0.50	<0.50	0.54	0.32J	0.86
TC-1-B-AC	5/24/2001	Asphalt Chip	Surface Removed in 2004	<0.5	<0.5	<0.5	<0.5	<0.5	**1.2**	1	**2.2**
TC-1-D-AC	5/24/2001	Asphalt Chip	Surface Removed in 2004	<0.5	<0.5	<0.5	<0.5	**1.4**	**2.7**	**3.5**	**7.6**
TC-1-D-AC-DUP	5/24/2001	Asphalt Chip	Surface Removed in 2004	<0.5	<0.5	<0.5	<0.5	0.84	**1.4**	**1.7**	**3.94**
TC-10-B-AC	5/24/2001	Asphalt Chip	Surface Removed in 2004	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TC-11-E-AC	5/24/2001	Asphalt Chip	Surface Removed in 2004	<0.5	<0.5	<0.5	<0.5	<0.5	0.76	<0.5	0.76
TC-3-E-AC	5/24/2001	Asphalt Chip	Surface Removed in 2004	<0.5	<0.5	<0.5	<0.5	<0.5	**1.9**	**2.2**	**4.1**
TC-4-B-AC	5/24/2001	Asphalt Chip	Surface Removed in 2004	<0.5	<0.5	<0.5	<0.5	<0.5	**2.9**	**3.2**	**6.1**
TC-5-E-AC	5/24/2001	Asphalt Chip	Surface Removed in 2004	<0.5	<0.5	<0.5	<0.5	<0.5	0.92	**1.3**	**2.22**
TC-6-B-AC	5/24/2001	Asphalt Chip	Surface Removed in 2004	<0.5	<0.5	<0.5	<0.5	<0.5	**3.7**	**2.2**	**5.9**
TC-7-E-AC	5/24/2001	Asphalt Chip	Surface Removed in 2004	<0.5	<0.5	<0.5	<0.5	<0.5	0.79	0.36J	**1.15**
TC-8-B-AC	5/24/2001	Asphalt Chip	Surface Removed in 2004	<0.5	<0.5	<0.5	<0.5	<0.5	0.69	<0.5	0.69
TC-9-E-AC	5/24/2001	Asphalt Chip	Surface Removed in 2004	<0.5	<0.5	<0.5	<0.5	<0.5	0.21J	<0.5	0.21

Notes:

1 - All units are milligram per kilogram (mg/kg).

2 - Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082 by Severn Trent Laboratories of Amherst, New York.

3 - A "J" indicates an estimated value less than the method detection limit.

4 - A "ND" indicates the parameter was not detected above method detection limits.

5 - Results in bold print are above the cleanup objective of 1 mg/kg.

TABLE 5
PCB RESULTS
TRANSPORTATION CORRIDOR CORING SAMPLES

GE ENERGY
TONAWANDA, NEW YORK

Sample ID (Corresponding Grid ID)	Date	Media	Sample Description	Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Total PCBs
TC-11.5-C-5-AC-1-2" (TC-11.5-C.5-AC-1-2")	5/23/2001	Asphalt Core	1-2 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TC-11.5-C-5-AC-2-3" (TC-11.5-C.5-AC-2-3")	5/23/2001	Asphalt Core	2-3 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TC-11.5-C-5-AC-3-4" (TC-11.5-C.5-AC-3-4")	5/23/2001	Asphalt Core	3-4 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TC-11.5-C-5-AC-4-5" (TC-11.5-C.5-AC-4-5")	5/23/2001	Asphalt Core	4-5 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TC-11.5-C-5-SS-0-1' (TC-11.5-C.5-SS-0-1')	5/23/2001	Soil	0 to 1 foot	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TC-11.5-C-5-SS-0-1'-DUP (TC-11.5-C.5-SS-0-1'-DUP)	5/23/2001	Soil	0 to 1 foot	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TC-11.5-C-5-SS-1-2' (TC-11.5-C.5-SS-1-2')	5/23/2001	Soil	1 to 2 feet	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TC-2.5-A-5-AC-1-2" (TC-2.5-A.5-AC-1-2")	5/23/2001	Asphalt Core	1-2 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TC-2.5-A-5-AC-2-3" (TC-2.5-A.5-AC-2-3")	5/23/2001	Asphalt Core	2-3 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TC-2.5-A-5-AC-3-4" (TC-2.5-A.5-AC-3-4")	5/23/2001	Asphalt Core	3-4 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TC-2.5-A-5-AC-4-5" (TC-2.5-A.5-AC-4-5")	5/23/2001	Asphalt Core	4-5 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TC-2.5-A-5-SS-0-1' (TC-2.5-A.5-SS-0-1')	5/23/2001	Soil	0 to 1 foot	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND

Notes:
1 - All units are milligram per kilogram (mg/kg).
2 - Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082 by Severn Trent Laboratories of Amherst, New York.
3 - A "ND" indicates the parameter was not detected above method detection limits.

TABLE 6
PCB RESULTS FOR CORING SAMPLES THROUGH SHOP FLOOR

GE ENERGY
TONAWANDA, NEW YORK

Sample ID	Date	Media	Sample Descripton	Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Total PCBs
Truck Bay Samples											
TB-3-A-CC-1-2"	5/23/2001	Concrete Core	1-2 inches	<0.5	<0.5	<0.5	<0.5	<0.5	**1.5**	**1.4**	**2.9**
TB-3-A-CC-2-3"	5/23/2001	Concrete Core	2-3 inches	<0.5	<0.5	<0.5	<0.5	<0.5	0.38J	0.41J	0.79J
TB-3-A-CC-3-4"	5/23/2001	Concrete Core	3-4 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TB-3-A-CC-4-5"	5/23/2001	Concrete Core	4-5 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TB-3-A-SS-7-8"	5/23/2001	Soil	7-8 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TB-4-F-CC-1-2"	5/23/2001	Concrete Core	1-2 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TB-4-F-CC-2-3"	5/23/2001	Concrete Core	2-3 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TB-4-F-CC-3-4"	5/23/2001	Concrete Core	3-4 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TB-4-F-CC-4-5"	5/23/2001	Concrete Core	4-5 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
TB-4-F-SS-7-8"	5/23/2001	Soil	7-8 inches	<0.5	<0.5	<0.5	<0.5	<0.5	0.36J	0.38J	0.74J
Depressed Dock Samples											
DD-1-E-CC-2-3"	5/23/2001	Concrete Core	2-3 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
DD-1-E-CC-3-4"	5/23/2001	Concrete Core	3-4 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
DD-1-E-CC-4-5"	5/23/2001	Concrete Core	4-5 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
DD-1-E-SS-7-8"	5/23/2001	Soil	7-8 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
DD-2-B-CC-1-2"	5/23/2001	Concrete Core	1-2 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
DD-2-B-CC-2-3"	5/23/2001	Concrete Core	2-3 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
DD-2-B-CC-3-4"	5/23/2001	Concrete Core	3-4 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
DD-2-B-CC-4-5"	5/23/2001	Concrete Core	4-5 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
DD-2-B-SS-7-8"	5/23/2001	Soil	7-8 inches	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND

Notes:
1 - All units are milligram per kilogram (mg/kg).
2 - Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082 by Severn Trent Laboratories of Amherst, New York.
3 - A "J" indicates an estimated value less than the method detection limit.
4 - A "ND" indicates the parameter was not detected above method detection limits.
5 - Results in bold print are equal to or above the cleanup objective of 1 mg/kg.

TABLE 7
SUMMARY OF PCB WIPE RESULTS
SHOP FLOOR

GE ENERGY
TONAWANDA, NEW YORK

Sample ID (Corresponding Grid ID)	Sample Date	Media	Sample Description	Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Total PCBs
TB-14-G-W	7/11/2002	Concrete	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	4.8	4.8
TB-14-L-W	7/11/2002	Concrete	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	6.8	6.8
TB-2-A-W	7/11/2002	Concrete	Surface Wipe	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	**40**	**40**
TB-4-F-W	7/11/2002	Concrete	Surface Wipe	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	**58**	**58**
TB-4-F-W DUP	7/11/2002	Concrete	Surface Wipe	<10	<10	<10	<10	<10	<10	**110**	**110**
TB-4-I-W	7/11/2002	Concrete	Surface Wipe	<25	<25	<25	<25	<25	<25	**170**	**170**
TB-4-Q-W	7/11/2002	Concrete	Surface Wipe	<25	<25	<25	<25	<25	<25	**250**	**250**
TB-5-A-W	7/11/2002	Concrete	Surface Wipe	<10	<10	<10	<10	<10	<10	**98**	**98**
TB-7-A-W	7/11/2002	Concrete	Surface Wipe	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	10	10
TB-7-G-W	7/11/2002	Concrete	Surface Wipe	<2	<2	<2	<2	<2	<2	**18**	**18**
TB-7-K-W	7/11/2002	Concrete	Surface Wipe	<25	<25	<25	<25	<25	<25	**91**	**91**
AB5-W (TB-5-AB-W)	6/25/2003	Concrete	Surface Wipe	<40	<40	<40	<40	<40	<40	**230**	**230**
AI5-W (TB-5-AI-W)	6/25/2003	Concrete	Surface Wipe	<8.0	<8.0	<8.0	<8.0	<8.0	<8.0	**59**	**59**
W5-W (TB-5-W-W)	6/25/2003	Concrete	Surface Wipe	<40	<40	<40	<40	<40	<40	**430**	**430**
AB9-W (TB-9-AB-W)	6/25/2003	Concrete	Surface Wipe	<8.0	<8.0	<8.0	<8.0	<8.0	<8.0	**59**	**59**
AI9-W (TB-9-AI-W)	6/25/2003	Concrete	Surface Wipe	<8.0	<8.0	<8.0	<8.0	<8.0	<8.0	**67**	**67**
G9-W (TB-9-G-W)	6/25/2003	Concrete	Surface Wipe	<8.0	<8.0	<8.0	<8.0	<8.0	<8.0	**61**	**61**
N9-W (TB-9-N-W)	6/25/2003	Concrete	Surface Wipe	<40	<40	<40	<40	<40	<40	**160**	**160**
W9-W (TB-9-W-W)	6/25/2003	Concrete	Surface Wipe	<8.0	<8.0	<8.0	<8.0	<8.0	<8.0	**47**	**47**
TB-14-AB-W	7/9/2003	Concrete	Surface Wipe	<5	<5	<5	<5	<5	6.5	**15**	**21.5**
TB-14-AI-W	7/9/2003	Concrete	Surface Wipe	<5	<5	<5	<5	<5	<5	**11**	**11**
TB-14-Q-W	7/9/2003	Concrete	Surface Wipe	<5	<5	<5	<5	<5	10	**33**	**43**
TB-14-W-W	7/9/2003	Concrete	Surface Wipe	<5	<5	<5	<5	<5	9.3	**26**	**35.3**
S1-FLOORWIPE1	3/31/2004	Concrete	Surface Wipe	<10	<10	<10	<10	<10	<10	**90**	**90**
S1-FLOORWIPE2	3/31/2004	Concrete	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	4.5	4.5
S1-TILEWIPE1	3/31/2004	Floor Tile	Surface Wipe	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	**53**	**53**
S1-TILEWIPE2	3/31/2004	Floor Tile	Surface Wipe	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	**16**	**16**
S3-TILEWIPE1	3/31/2004	Floor Tile	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	2.3	2.3
S3-TILEWIPE2	3/31/2004	Floor Tile	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	4.5	4.5
S3-TILEWIPE3	3/31/2004	Floor Tile	Surface Wipe	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	2.1	2.1

Notes:

1 - All units are microgram per 100 square centimeters ($\mu g/100cm^2$).

2 - Polychlorinated Biphenyls (PCBs) were analysed by USEPA method 8082 by Severn Trent Laboratories of Amherst, New York.

3 - Results in bold print are above the cleanup objective of 10 $\mu g/100cm^2$.

TABLE 8

PCB WIPE SAMPLING RESULTS
FOR GROUNDING PLATES

GE ENERGY
TONAWANDA, NEW YORK

Sample ID	Date	Media & Location	Sample Description	Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Total PCBs
S4-GRNDPLT-WP-032304	3/23/2004	Steel Grounding Plate West of Column Line 2C-2D	Surface Wipe	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	**42**	**42**
Plate #1	5/14/2004	Steel Grounding Plate West of Column Line 2C-2D	Surface Wipe	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	3.3	3.3
Plate #2	5/14/2004	Steel Grounding Plate East of Column Line 2C-2D	Surface Wipe	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	2.1	2.1
Plate #3	5/14/2004	Steel Grounding Plate East of Column Line 4X-4Y	Surface Wipe	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND

Notes:

1 - All units are microgram per 100 square centimeters ($\mu g/100cm^2$).
2 - Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082 by Severn Trent Laboratories of Amherst, New York.
3 - A "ND" indicates the parameter was not detected above method detection limits.

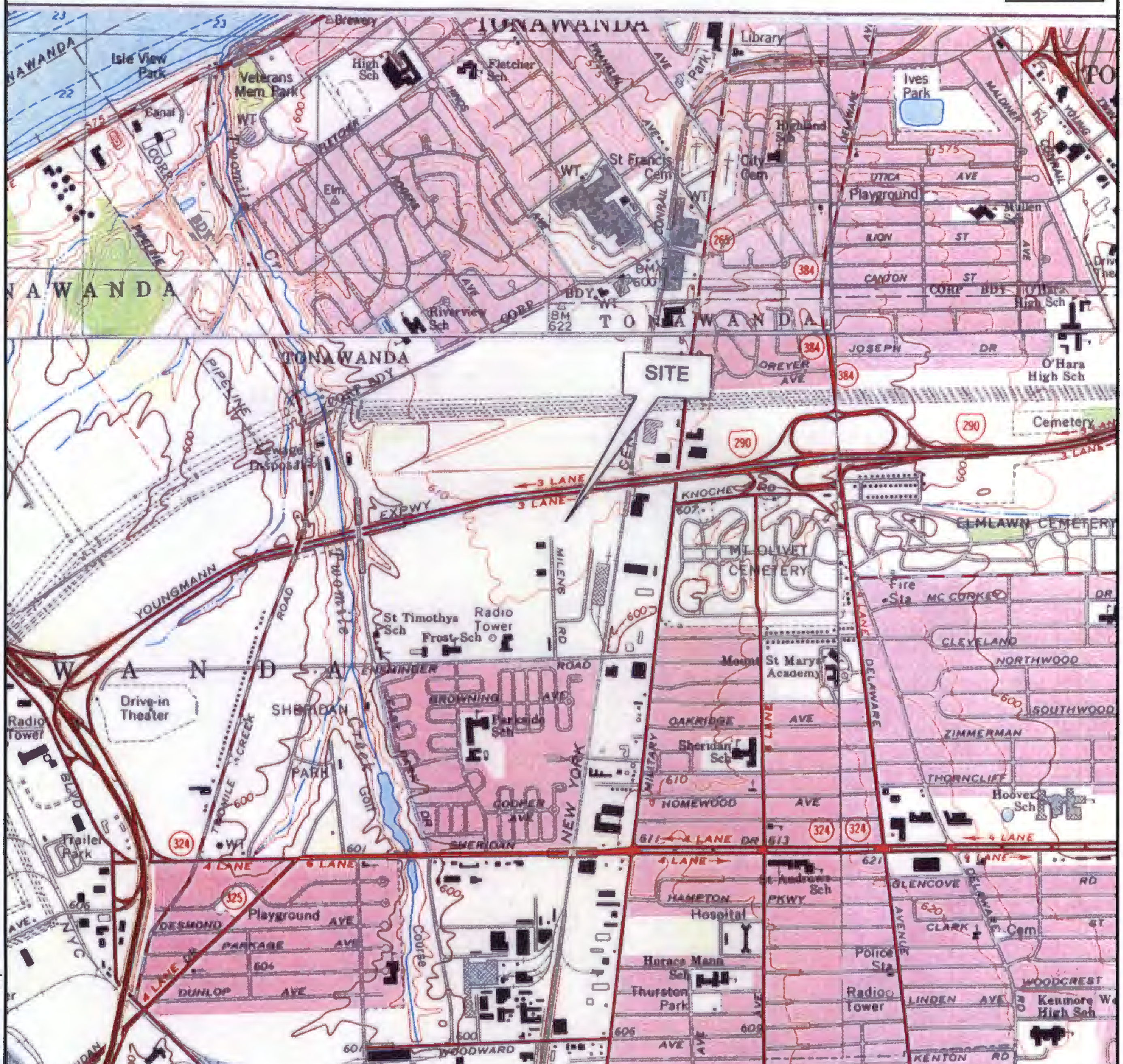
TABLE 9
PCB RESULTS
FOR POST REMOVAL ASPHALT CHIP SAMPLES

GE ENERGY
TONAWANDA, NEW YORK

Sample ID	Date	Media	Sample Description	Arochlor 1016	Arochlor 1221	Arochlor 1232	Arochlor 1242	Arochlor 1248	Arochlor 1254	Arochlor 1260	Total PCBs
CONF-AC-4	12/3/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	<0.5	<0.5	0.54	0.32J	0.86
CONF-AC-6	12/4/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
CONF-8-B-AC	12/4/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	<0.5	**6.4**	<0.5	**8.9**	**15.3**
CONF-1-B-AC	12/2/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	0.097J	0.18J	**3.5**	**3.3**	**7.08**
CONF-1-D-AC	12/2/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	0.51	<0.5	**1.4**	<0.5	**1.91**
CONF-3-E-AC	12/2/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	<0.5	**11**	<0.5	**13**	**24**
CONF-5-E-AC	12/2/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	<0.5	**1.7**	<0.5	**5.8**	**7.5**
CONF-AC-2	12/2/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	<0.5	0.54	<0.5	0.84	**1.38**
CONF-AC-8	12/2/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	0.7	<0.5	<0.5	**1.1**	**1.8**
CONF-4-B-AC	12/3/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
CONF-7-E-AC	12/3/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
CONF-AC-1	12/3/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	<0.5	ND
CONF-AC-5	12/3/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	<0.5	<0.5	0.96	0.85	**1.81**
CONF-6-B-AC	12/4/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	<0.5	<0.5	0.07J	0.028J	0.098
CONF-AC-3	12/4/2004	Asphalt Chip	Post 1" Removal	<0.5	<0.5	<0.5	<0.5	<0.5	0.03J	0.027J	0.057

Notes:
1 - All units are milligram per kilogram (mg/kg).
2 - Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082 by Severn Trent Laboratories of Amherst, New York.
3 - A "J" indicates an estimated value less than the method detection limit.
4 - A "ND" indicates the parameter was not detected above method detection limits.
5 - Results in bold print are above the cleanup objective of 1 mg/kg.

N



Title:	SITE LOCATION MAP
Location:	175 MILENS ROAD TONAWANDA, NEW YORK
Client:	GE ENERGY

SOURCE:
USGS 7 1/2 Minute Series Topographic Maps
Buffalo Northwest, 1965
Buffalo Northeast, 1965
Tonawanda West, 1980
Tonawanda East, 1980

0 1,000 2,000
GRAPHIC SCALE IN FEET

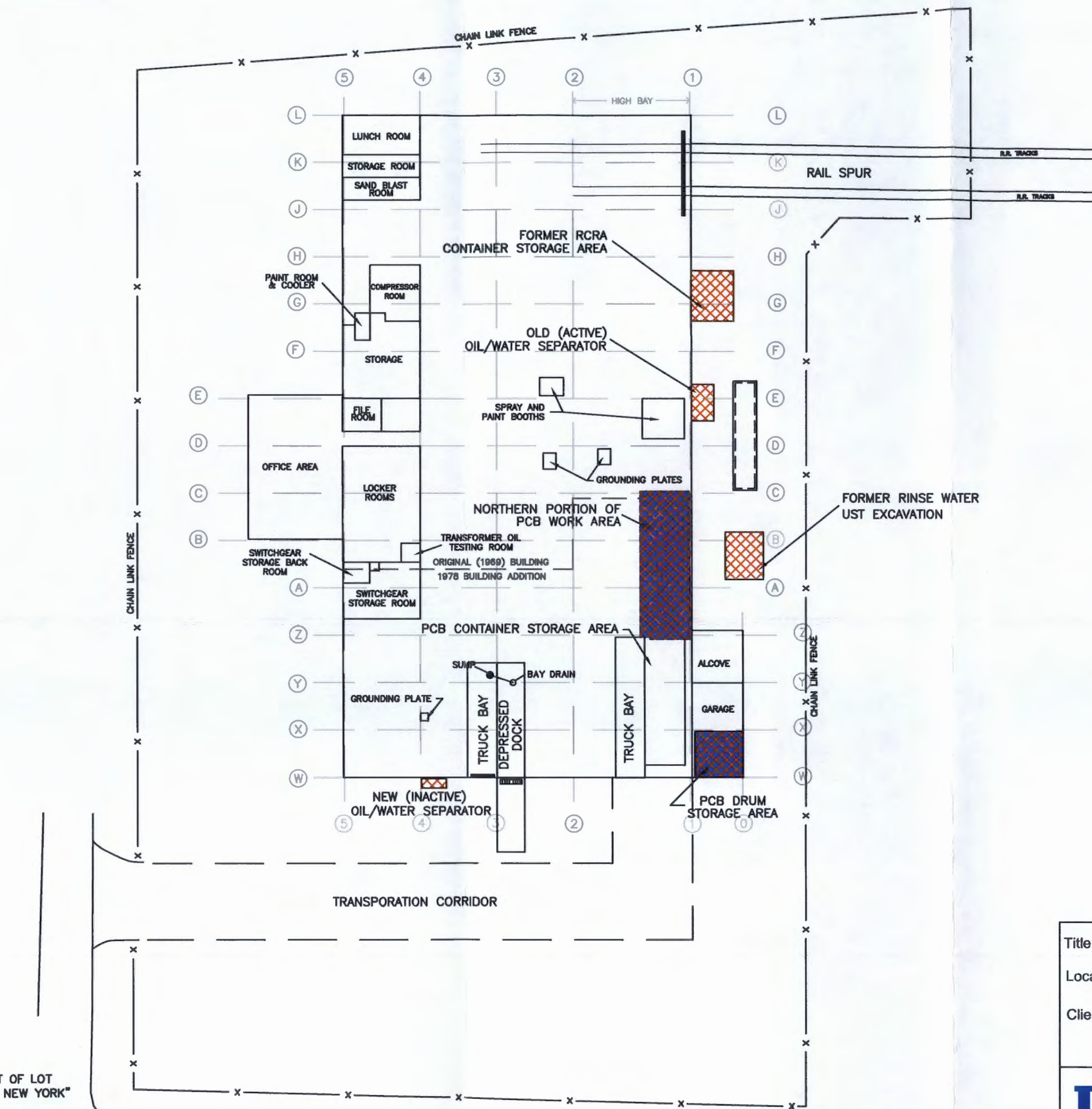
URS

URS Corporation
28 Corporate Drive, Suite 200
Clifton Park, New York 12065

Drafter: DAD	Date: February 2006
Drg. Size: 8.5 x 11	Job No.: 38394429.00000

FIGURE 1

P:\In Progress\GE\Tonawanda\PCB Storage\2005 CP\Figure 1 Site Location Map.ai



N

0 30 60
GRAPHIC SCALE IN FEET

EXPLANATION

- SWMU/AOC
- DEACTIVATED PCB AREA
- FLOOR DRAIN
- TRENCH DRAIN
- COLUMN LINES

NOTE: LOCATIONS ARE APPROXIMATE

SOURCES:
1. "MAP OF GENERAL ELECTRIC SERVICE CENTER PROPERTY, PART OF LOT 45, TOWNSHIP 12, RANGE 8, TOWN OF TONAWANDA, ERIE COUNTY, NEW YORK" KRIEBEL ASSOCIATES, JULY 29, 1998.
2. "1/8" PART FLOOR PLAN AND DETAILS," CANNON DESIGN INC., AS-BUILT 4-19-78.

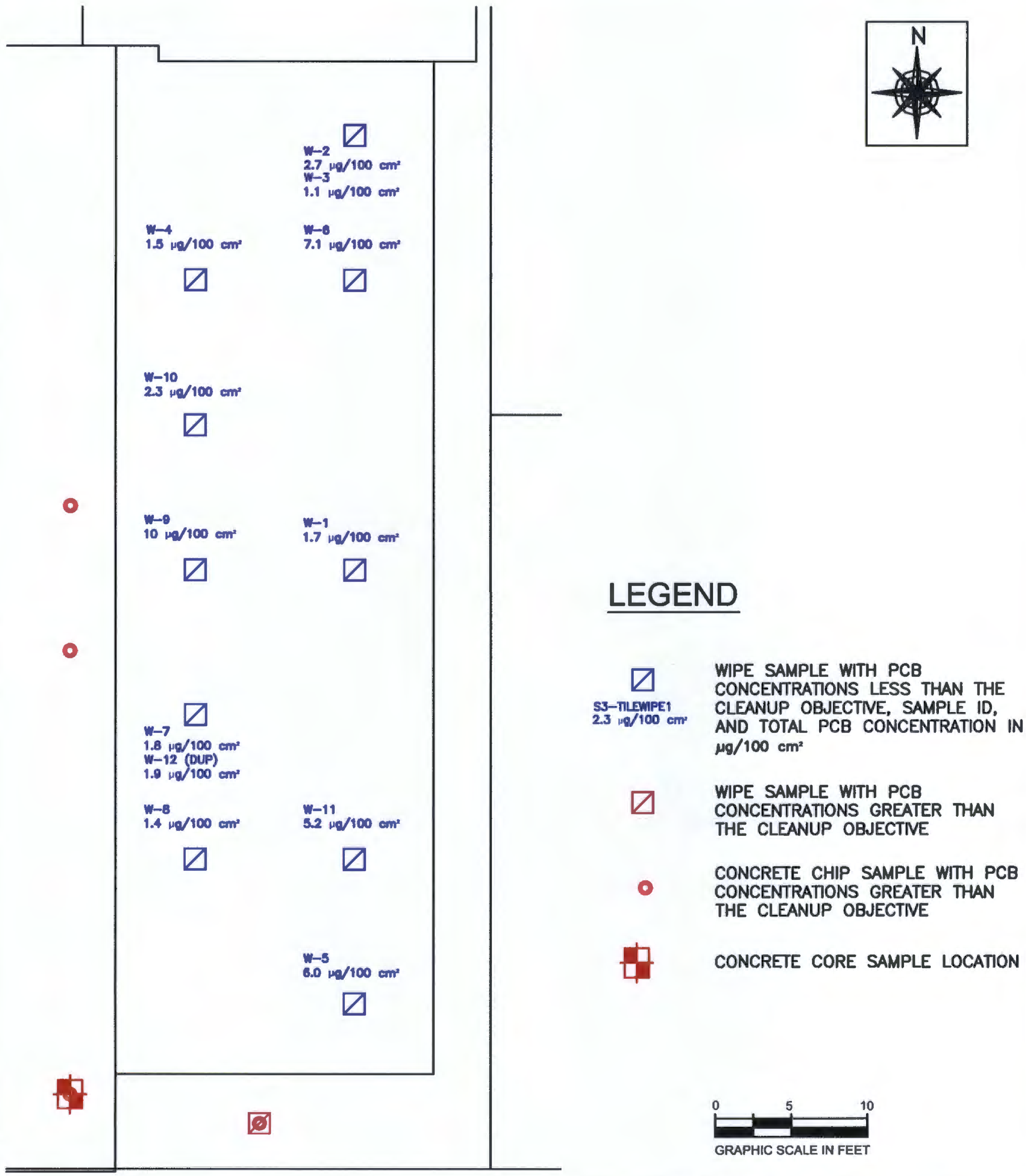
P:\In Progress\GE\Tonawanda\PCB Storage\2005 cp\Figures\F2 Site Plan.dwg

Title:	SITE PLAN
Location:	175 MILENS ROAD TONAWANDA, NEW YORK
Client:	GE ENERGY

URS
URS Corporation
28 Corporate Drive, Suite 200
Clifton Park, New York 12065

Drafter: KP	Date: February 2006
Drg. Size: 11 X 17	Job No.: 38394429.00000

FIGURE 2



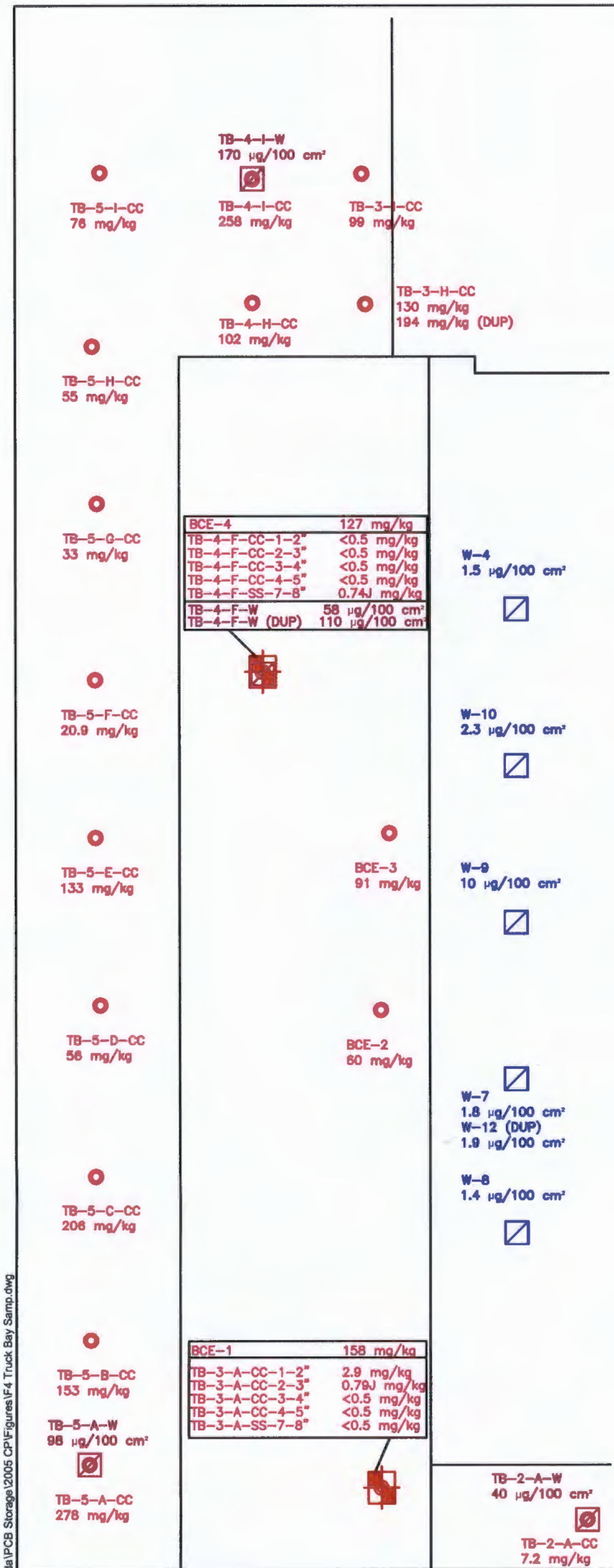
Title:	SUMMARY OF PCB SAMPLING FOR PCB CSA
Location:	175 MILENS ROAD TONAWANDA, NEW YORK
Client:	GE ENERGY

URS URS Corporation 28 Corporate Drive, Suite 200 Clifton Park, New York 12065	Drafter: KP	Date: February 2006
	Drg. Size: 8.5 x 11	Job No.: 38394179.00000
		FIGURE 3

NOTES:
1. LOCATIONS ARE APPROXIMATE.
2. FIGURES 5 AND 6 SHOW DETAILS FOR TRUCK BAY AND DEPRESSED DOCK, RESPECTIVELY. FIGURE 8 SHOWS ALL THE INTERIOR SAMPLING LOCATIONS.

SOURCES:
1. "MAP OF GENERAL ELECTRIC SERVICE CENTER PROPERTY, PART OF LOT 45, TOWNSHIP 12, RANGE 8, TOWN OF TONAWANDA, ERIE COUNTY, NEW YORK" KRIEBEL ASSOCIATES, JULY 29, 1998.
2. "1/8" PART FLOOR PLAN AND DETAILS," CANNON DESIGN INC., AS-BUILT 4-19-78.
3. "1/16 FLOOR PLAN AND MEZZANINE FLOOR PLAN" CANNON DESIGN, INC., APRIL 19, 1978.

P:\In Progress\GE\Tonawanda\PCB Storage\2005 CP\Figures\F3 PCB CSA samp.dwg



LEGEND

S3-TILEWIPE1
2.3 µg/100 cm²

WIPE SAMPLE WITH PCB CONCENTRATIONS LESS THAN THE CLEANUP OBJECTIVE, SAMPLE ID, AND PCB CONCENTRATION IN µg/100 cm²

TB-9-G-W
61 µg/100 cm²

WIPE SAMPLE WITH PCB CONCENTRATIONS GREATER THAN THE CLEANUP OBJECTIVE, SAMPLE ID, AND PCB CONCENTRATION IN µg/100 cm²

TB-7-C-CC
15.3 mg/kg

CONCRETE CHIP SAMPLE WITH PCB CONCENTRATIONS GREATER THAN THE CLEANUP OBJECTIVE, SAMPLE ID, AND PCB CONCENTRATION IN mg/kg

CONCRETE CORE SAMPLE LOCATION

0 5 10

GRAPHIC SCALE IN FEET

NOTES:

1. LOCATIONS ARE APPROXIMATE.
2. FIGURES 4 AND 6 SHOW DETAILS FOR PCB CSA AND DEPRESSED DOCK, RESPECTIVELY. FIGURE 8 SHOWS ALL THE INTERIOR SAMPLING LOCATIONS.

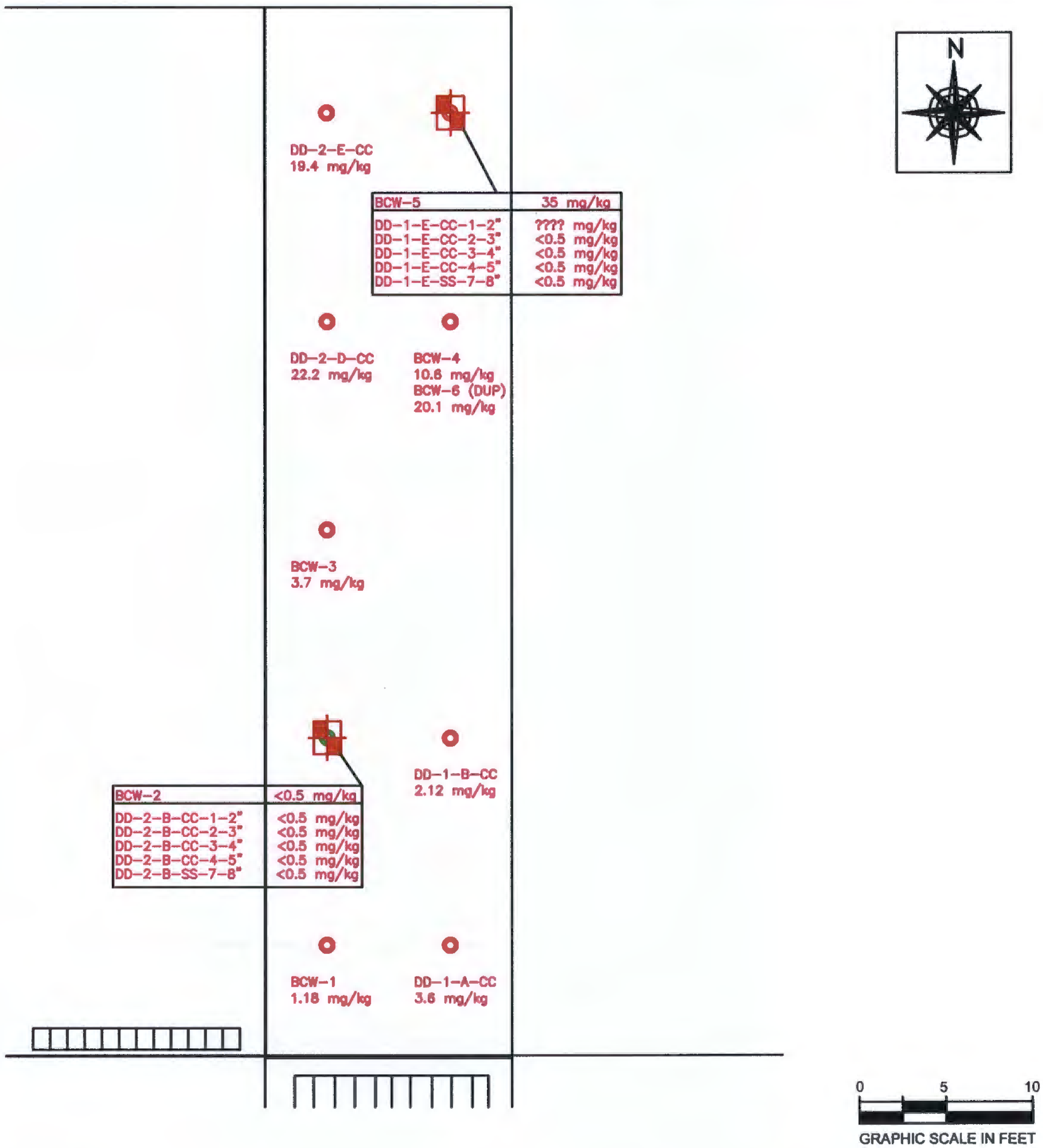
SOURCES:

1. "MAP OF GENERAL ELECTRIC SERVICE CENTER PROPERTY, PART OF LOT 45, TOWNSHIP 12, RANGE 8, TOWN OF TONAWANDA, ERIE COUNTY, NEW YORK" KRIEBEL ASSOCIATES, JULY 29, 1998.
2. "1/8" PART FLOOR PLAN AND DETAILS," CANNON DESIGN INC., AS-BUILT 4-19-78.
3. "1/16 FLOOR PLAN AND MEZZANINE FLOOR PLAN" CANNON DESIGN, INC., APRIL 19, 1978.

Title:	SUMMARY OF PCB SAMPLING NEAR AT GRADE TRUCK BAY
Location:	175 MILENS ROAD TONAWANDA, NEW YORK
Client:	GE ENERGY

URS	Drafter: KP	Date: February 2006
	Drg. Size: 8.5 x 11	Job No.: 38394429.00000
URS Corporation 28 Corporate Drive, Suite 200 Clifton Park, New York 12065	FIGURE 4	

P:\In Progress\GE\Tonawanda\PCB Storage\2005 CP\Figures\F4 Truck Bay Samp.dwg



LEGEND

- TRENCH DRAIN
- TB-6-C-W 61 µg/100 cm² — WIPE SAMPLE WITH PCB CONCENTRATIONS GREATER THAN THE CLEANUP OBJECTIVE, SAMPLE ID, AND PCB CONCENTRATION IN µg/100 cm²
- CONCRETE CHIP SAMPLE WITH PCB CONCENTRATIONS BELOW DETECTION LIMITS AND SAMPLE ID
- TB-7-C-CC 15.3 mg/kg — CONCRETE CHIP SAMPLE WITH PCB CONCENTRATIONS GREATER THAN THE CLEANUP OBJECTIVE, SAMPLE ID, AND PCB CONCENTRATION IN mg/kg
- CONCRETE CORE SAMPLE LOCATION

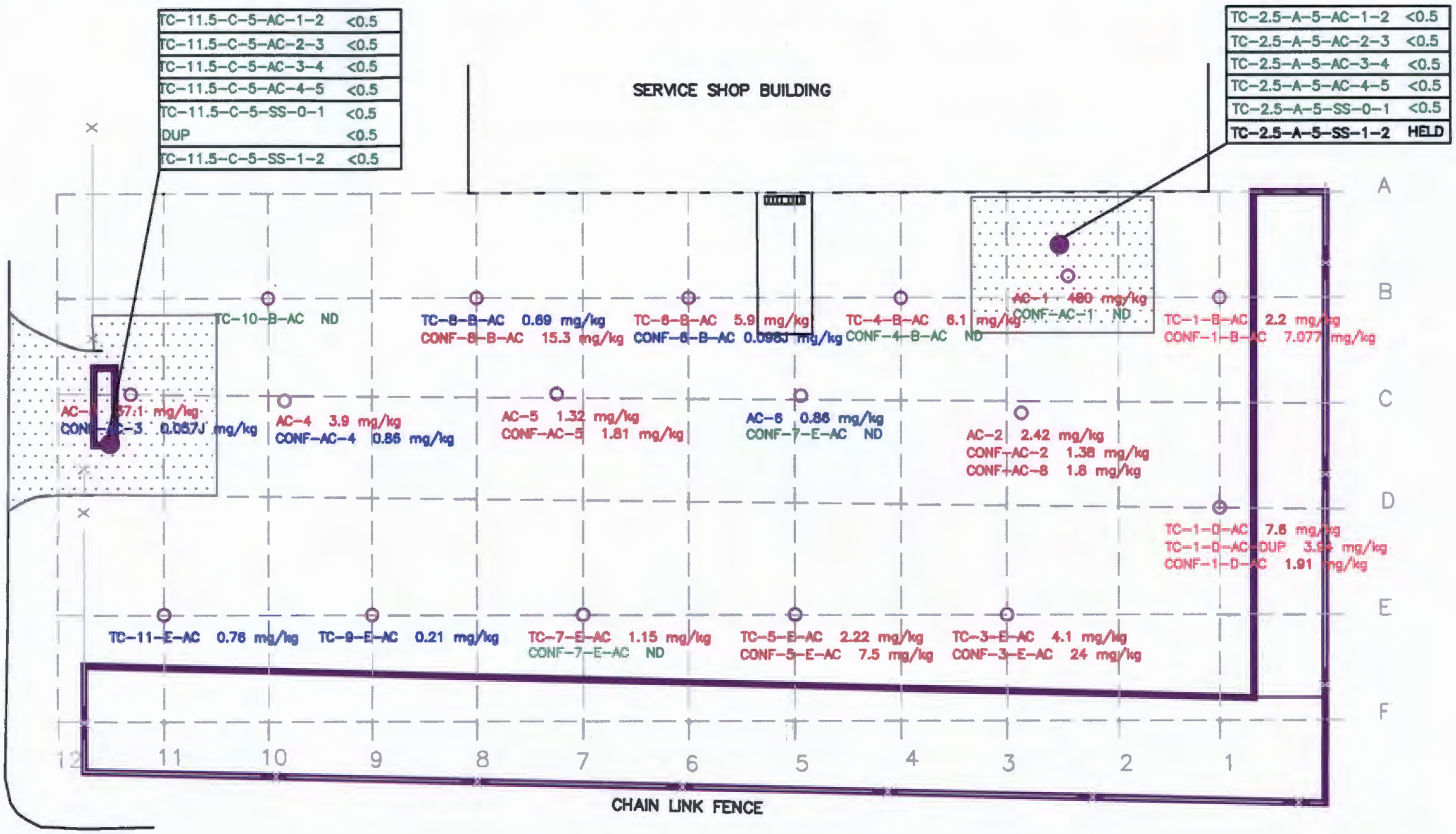
SOURCES:
1. "MAP OF GENERAL ELECTRIC SERVICE CENTER PROPERTY, PART OF LOT 45, TOWNSHIP 12, RANGE 8, TOWN OF TONAWANDA, ERIE COUNTY, NEW YORK" KRIEBEL ASSOCIATES, JULY 29, 1998.
2. "1/8" PART FLOOR PLAN AND DETAILS," CANNON DESIGN INC., AS-BUILT 4-19-78.
3. "1/16 FLOOR PLAN AND MEZZANINE FLOOR PLAN" CANNON DESIGN, INC., APRIL 19, 1978.

NOTES:
1. LOCATIONS ARE APPROXIMATE.
2. FIGURES 4 AND 5 SHOW DETAILS FOR PCB CSA AND TRUCK BAY, RESPECTIVELY. FIGURE 6 SHOWS ALL THE INTERIOR SAMPLING LOCATIONS

P:\In Progress\GE\Tonawanda\PCB Storage\2005 CP\Figures\F5 Depressed Dock Samp.dwg

Title:	SUMMARY OF PCB SAMPLING FOR DEPRESSED DOCK
Location:	175 MILENS ROAD TONAWANDA, NEW YORK
Client:	GE ENERGY

URS — URS Corporation, 28 Corporate Drive, Suite 200, Clifton Park, New York 12065	Drafter: KP	Date: February 2006
	Drg. Size: 8.5 x 11	Job No.: 38394429.00000
		FIGURE 5



LEGEND

(trench drain symbol)	TRENCH DRAIN
○	ASPHALT CHIP SAMPLE LOCATION
●	CORE LOCATION
TC-10-B-AC ND	SAMPLE ID FOR LOCATIONS WITH PCB CONCENTRATIONS BELOW DETECTION LIMITS
TC-8-B-AC 0.69 mg/kg	SAMPLE ID AND PCB CONCENTRATION FOR SAMPLES WITH PCB CONCENTRATIONS LESS THAN CLEANUP OBJECTIVE
CONF-8-B-AC 15.3 mg/kg	SAMPLE ID AND PCB CONCENTRATION FOR SAMPLES WITH PCB CONCENTRATIONS GREATER THAN CLEANUP OBJECTIVE
(dotted box)	AREA WHERE REMOVED ASHPALT SEGREGATED AS TSCA WASTE
(purple line)	AREAS SOUTH OF THE SHOP WHERE ASHPALT WAS NOT REMOVED

0 25 50

GRAPHIC SCALE IN FEET

NOTE: LOCATIONS ARE APPROXIMATE.

SOURCE: "MAP OF GENERAL ELECTRIC SERVICE CENTER PROPERTY, PART OF LOT 45, TOWNSHIP 12, RANGE 8, TOWN OF TONAWANDA, ERIE COUNTY, NEW YORK" KRIEBEL ASSOCIATES, JULY 29, 1998.

Title:	SUMMARY OF PCB SAMPLING FOR TRANSPORTATION CORRIDOR
Location:	175 MILENS ROAD TONAWANDA, NEW YORK
Client:	GE ENERGY

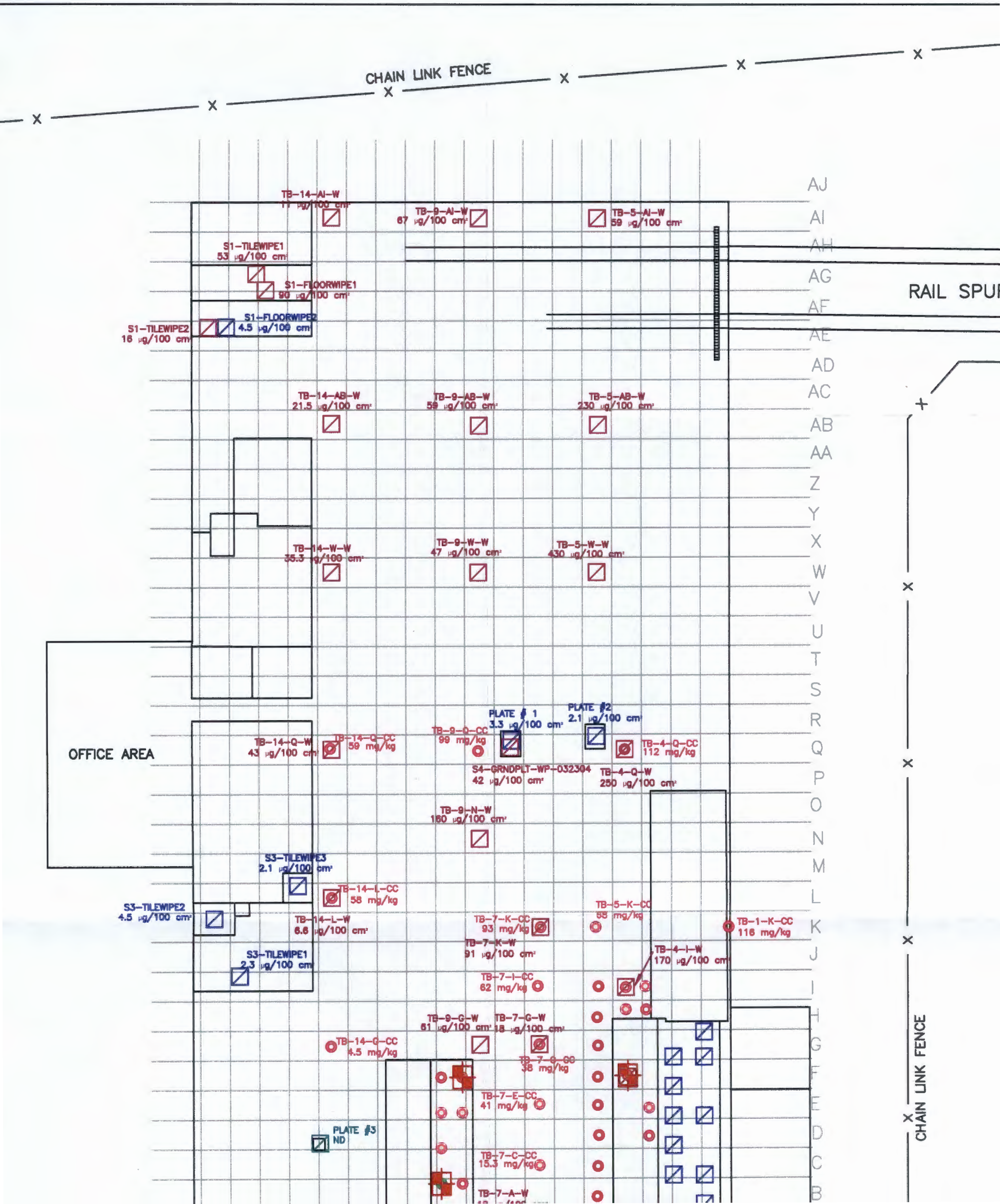
URS

URS Corporation
28 Corporate Drive, Suite 200
Clifton Park, New York 12065

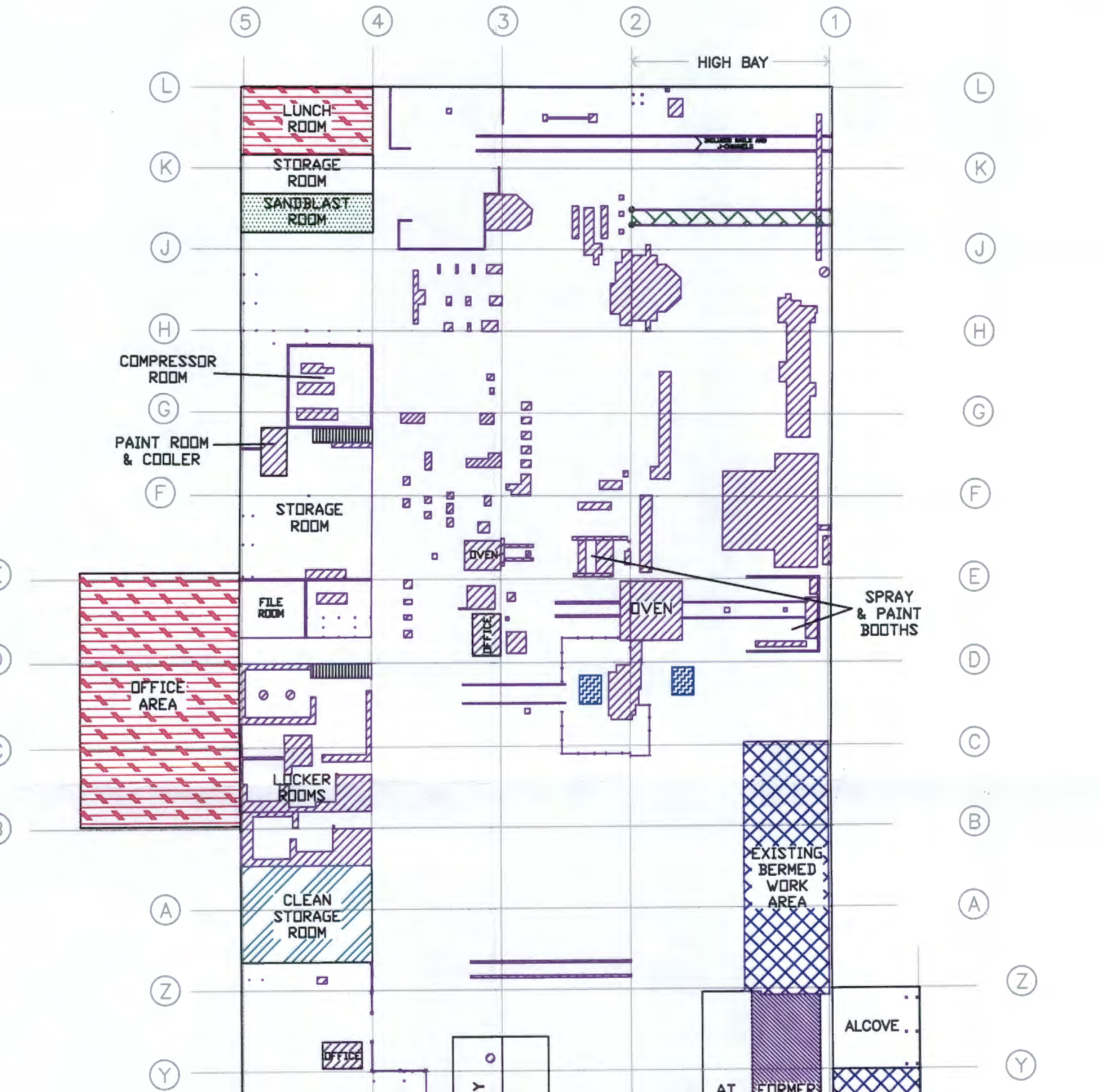
Drafter: KP	Date: February 2006
Drg. Size: 8.5 x 11	Job No.: 38394429.00000

FIGURE 6

P:\In Progress\GE\Tonawanda\PCB Storage\2005 CP\Figures\F8 TC samp sum.dwg



CHAIN LINK FENCE
RAIL SPUR
OFFICE AREA
CHAIN LINK FENCE
AJ
AI
AH
AG
AF
AE
AD
AC
AB
AA
Z
Y
X
W
V
U
T
S
R
Q
P
O
N
M
L
K
J
I
H
G
F
E
D
C
B
TB-14-AI-W
TB-9-AI-W
67 µg/100 cm²
TB-5-AI-W
59 µg/100 cm²
S1-TILEWIPE1
53 µg/100 cm²
S1-FLOORWIPE1
90 µg/100 cm²
S1-FLOORWIPE2
4.5 µg/100 cm²
S1-TILEWIPE2
16 µg/100 cm²
TB-14-AB-W
21.5 µg/100 cm²
TB-9-AB-W
59 µg/100 cm²
TB-5-AB-W
230 µg/100 cm²
TB-14-W-W
35.3 µg/100 cm²
TB-9-W-W
47 µg/100 cm²
TB-5-W-W
430 µg/100 cm²
PLATE # 1
3.3 µg/100 cm²
PLATE #2
2.1 µg/100 cm²
TB-14-Q-W
43 µg/100 cm²
TB-14-Q-CC
59 mg/kg
TB-9-Q-CC
99 mg/kg
TB-4-Q-CC
112 mg/kg
S4-GRNDPLT-WP-032304
42 µg/100 cm²
TB-4-Q-W
250 µg/100 cm²
TB-9-N-W
160 µg/100 cm²
S3-TILEWIPE3
2.1 µg/100 cm²
TB-14-L-CC
58 mg/kg
S3-TILEWIPE2
4.5 µg/100 cm²
TB-14-L-W
6.6 µg/100 cm²
TB-7-K-CC
93 mg/kg
TB-5-K-CC
TB-1-K-CC
116 mg/kg
TB-7-K-W
91 µg/100 cm²
S3-TILEWIPE1
2.3 µg/100 cm²
TB-4-I-W
170 µg/100 cm²
TB-7-I-CC
62 mg/kg
TB-9-G-W
61 µg/100 cm²
TB-7-G-W
18 µg/100 cm²
TB-14-G-CC
4.5 mg/kg
TB-7-G-CC
38 mg/kg
TB-7-E-CC
41 mg/kg
PLATE #3
ND
TB-7-C-CC
15.3 mg/kg
TB-7-A-W


5
4
3
2
1
HIGH BAY
L
LUNCH ROOM
K
STORAGE ROOM
SANDBLAST ROOM
J
H
COMPRESSOR ROOM
G
PAINT ROOM & COOLER
F
STORAGE ROOM
OVEN
E
FILE ROOM
OFFICE
OVEN
SPRAY & PAINT BOOTHS
D
OFFICE AREA
C
LOCKER ROOMS
B
EXISTING BERMED WORK AREA
A
CLEAN STORAGE ROOM
Z
ALCOVE
OFFICE
Y
AT
FORMER