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June 3, 2016

Ms. Jessica LaClair
Environmental Engineer
New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12233-7013

RE: Corrective Measure Completion Final Report
GE Parts and Repair Service Center
Tonawanda, New York
NYSDEC Site ID: 915244
EPA ID: NYD067539940
Permit ID: 9-1464-00044/00001

Dear Ms. LaClair:

On behalf of General Electric International, Inc. (GE), AECOM, a successor to URS Corporation – New York (URS), is submitting this *Corrective Measure Completion Final Report* (*CMCFR*) for GE's Parts and Repair Service Center in Tonawanda, New York. The attached *CMCFR* has been prepared in partial fulfillment of the 373 Permit and *Corrective Measure Implementation Plan* for the site. A Groundwater Monitoring Plan and a Site Management Plan will be submitted under separate cover.

GE and AECOM appreciate the NYSDEC's continued assistance with this project. If you have any questions please call us, or Mr. Tom Antonoff of GE at (518) 862-2720.

Very truly yours,

Karen Peppin
Project Manager
URS Corporation – New York

Don Porterfield, P.E.
Principal Environmental Engineer
URS Corporation – New York

cc: Ms. Kathleen Emery, NYSDEC – cover letter and CD
Mr. Andrew Park, USEPA – cover letter and CD
Mr. Tom Antonoff, GE
Ms. Pam Cook, GE

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CMCFR Cover Letter.docx

NYSDEC SITE NUMBER: 915244
USEPA ID# NYD067539940
PERMIT ID: 9-1646-00044/00001

PARTS AND REPAIR SERVICE CENTER
GENERAL ELECTRIC INTERNATIONAL, INC.
175 MILENS ROAD
TONAWANDA, NEW YORK

CORRECTIVE MEASURE COMPLETION FINAL REPORT

JUNE 3, 2016

Prepared for:

GENERAL ELECTRIC INTERNATIONAL, INC.
319 GREAT OAKS BOULEVARD
ALBANY, NEW YORK

Prepared By:

AECOM
40 British American Boulevard
Latham, New York 12110

ENGINEERING CERTIFICATION

I, Don Porterfield, certify that I am currently a NYS registered professional engineer, I had primary direct responsibility for the implementation of the subject construction program, and I certify that the Corrective Measure Implementation Design was implemented and that all construction activities were completed in substantial conformance the DER-approved *Corrective Measure Implementation Design Report*.

By ______________________ Date 6/2/16

New York Professional Engineer License No. 071402

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1.0 INTRODUCTION

On behalf of General Electric International, Inc. (GE), AECOM, a successor to URS Corporation – New York URS (URS), which is now a wholly owned subsidiary of AECOM, has prepared this *Corrective Measure Completion Final Report* (*CMCFR*) for GE's Parts and Repair Service Center at 175 Milens Road, in Tonawanda, New York (USEPA ID# NYD067539940 and NYSDEC Site Number 915244). This *CMCFR* is being prepared in partial fulfillment of the requirements for Corrective Action specified in the *6NYCRR Part 373 Hazardous Waste Management Permit* (*373 Permit*) issued by the New York State Department of Environmental Conservation (NYSDEC) on July 5, 2012. The *373 Permit* (Permit ID 9-1464-00044/00001) was issued under the Resource Conservation and Recovery Act (RCRA) and requires GE to perform Corrective Measures at the facility.

A Corrective Action Program has been ongoing at the service center in accordance with the May 1996 Hazardous Waste Management Permit and the subsequent July 2012 permit. The original permit allowed storage of hazardous wastes that contained volatile organic compounds (VOCs), metals, and/or polychlorinated biphenyls (PCBs) to be stored at the facility. There has been no treatment or disposal of hazardous or solid wastes at the facility. Both the RCRA Container Storage Area and the PCB Storage Area were closed in accordance with approved closure plans. In accordance with the 1996 *373 Permit*, site assessment and investigation (Section 2.3) were undertaken, several interim corrective measures were performed, and potential corrective measures were evaluated. The Statement of Basis for selection of the final remedy was published for public comment in late 2011, and in March 2012 the NYSDEC made a determination on the Final Corrective Measures. The July 2012 *373 Permit,* is a corrective action only permit that incorporates those measures and requires GE to perform additional investigation when inaccessible sub-slab soils become accessible.

In accordance with the July 2012 *373 Permit*, a *Corrective Measure Implementation Plan* (*CMIP*) was prepared by URS on behalf of GE. The *CMIP* was submitted to NYSDEC, who approved the *CMIP* on November 13, 2012. Following a series of pre-design investigations (Section 2.3), a *Corrective Measure Implementation Design Report* (*CMID Report*) was prepared by AECOM on behalf of GE, and was submitted to NYSDEC on January 16, 2015. The NYSDEC approved the design with comments in a letter dated February 23, 2015. A copy of the approval letter is provided in Appendix A. As this *CMCFR* documents, the Corrective Measures for the site were implemented in general accordance with plans presented in the October 2, 2012 *Corrective Measure Implementation Plan* and *Corrective Measure Implementation Design Report*.

This *CMCFR* contains background information on the site (Section 2.0), and a summary of the previously completed Interim Corrective Measures (ICMs) is provided in Section 3.0. Section 4.0 presents the Corrective Measure objectives. Section 5.0 is a summary of the Corrective Measure design for the site. Section 6.0 describes the Corrective Measure Implementation (CMI). Deviations from the work plan and design are described in Section 7.0. Conclusions are presented in Section 8.0. The site management program, including a description of remaining conditions, is described in Section 9.0. Section 10.0 is a list of references. Tables and figures that are referenced in this report follow the text. Appendices containing a variety of backup material are attached or provided on the data disc. An Engineer Certification precedes this section.

2.0 SITE BACKGROUND

This section provides a description of the site, a summary of the historic hazardous waste activity at the site, and an overview of the Corrective Action history.

2.1 SITE DESCRTIPTION

GE's Parts and Repair Service Center (or shop) is located on an approximately 5.8 acre parcel at 175 Milens Road in the Town of Tonawanda, Erie County, New York (Figure 1). The site is secured with a chain link fence and gate, and is improved with a 69,000-square foot, slab-on-grade building. A rail spur extends from the northeast corner of the building towards Military Road east of the site.

The site is bounded to the north by Interstate Route 290, which is owned by the New York State Department of Transportation (NYSDOT), and land owned by Lamar Advertising Company (Lamar), who maintains an advertising billboard on their property. The east and south sides of the site are bounded by property owned by DKP Buffalo, LLC (DKP). The west side of the side is bounded by Milens Road and property owned by Coca-Cola. These adjacent properties are shown in Figure 2.

The site plan, which is presented in Figure 3, illustrates the site layout prior to the Corrective Measures undertaken in 2015. The site was developed by GE in 1968 and 1969 for use as a service center to repair industrial equipment such as electric motors, transformers, turbines, pumps, and compressors. The original construction at the site included the northern portion of the existing building. An addition to the south end of the building was constructed in 1978. The service center is an active operating facility.

The site is relatively flat at an elevation of approximately 610 to 613 feet relative to the North American Vertical Datum 1988 (NAVD88). There is a small drainage swale north of the GE property that drains to the east. Although this swale contains some soil and vegetation that are indicators for wetlands, the swale is not considered a wetland because it is not connected to a jurisdictional wetland.

The Town of Tonawanda maintains separate storm sewer and sanitary sewer systems. Storm water from the site discharges to the town storm sewer system beneath Milens Road, which discharges into a larger line that discharges into Two Mile Creek approximately 3,000 feet to west (see Figure 1) and near Oriskany Drive. The sanitary sewers at the GE property discharge to a town owned line beneath Milens Road and ultimately flow to Town of Tonawanda wastewater treatment plant.

The soils underlying the site consist of very dense glaciolacustrine sediments, which are predominantly clays and silts. These sediments are approximately 60 to 70 feet thick. The unsaturated zone extends to at least 15 feet below ground surface (bgs). The depth to groundwater in the one deep monitoring well (MW-5 on Figure 3) installed at the site indicates the depth to groundwater in native soils at the site is approximately 25 feet bgs.

There are isolated areas of fill, which may contain perched groundwater, present near the building in utility excavations. Four shallow monitoring wells (MW-1 through MW-4) were installed in fill associated with utilities or excavations. The depth to groundwater perched in these filled areas is approximately six to nine feet bgs.

2.2 HAZARDOUS WASTE STORAGE

In conjunction with operations, GE generates and stores hazardous wastes. The May 1996 *373 Permit* allowed GE to store hazardous wastes that contained VOCs, metals, and PCBs. GE did not treat or dispose hazardous or solid wastes at the site.

2.2.1 RCRA Hazardous Waste Storage Area

GE previously stored hazardous wastes in a RCRA Container Storage Area (RCRA CSA) prior to off-site disposal of the wastes. The RCRA CSA was a covered area adjacent to the east side of the service center building (Figure 3). The RCRA CSA was subject to the May 1996 *Part 373 Permit* issued by NYSDEC and a *Hazardous and Solid Waste Amendment* (*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. NYSDEC notified GE in a letter, dated April 3, 2006, that the RCRA CSA was officially considered closed. The structure itself is still present and is currently used for storage of miscellaneous items.

2.2.2 Commercial PCB Storage Area

Prior to August 2000, GE operated a Commercial PCB Storage Area inside the Tonawanda service center under the terms of an approval issued by USEPA on June 9, 1995. The Commercial PCB Storage Area was also covered by the May 1996 *Part 373 Permit* because PCBs are regulated as hazardous waste in New York State.

GE used the PCB storage area to service PCB-containing equipment and to store PCB wastes generated by activities at the shop prior to shipping the wastes to appropriately licensed off-site disposal facilities. As shown in Figure 3, the Commercial PCB Storage Area was comprised of three areas (PCB work area, PCB container storage area, and PCB drum storage area) in the southeast corner of the shop. GE decommissioned the PCB drum storage area and the northern portion of the work area in 1994.

In November 2000, the Commercial PCB Storage Area was decommissioned in accordance with the *Revised Closure Plan*, which was submitted to USEPA on June 28, 2000. The *Revised Closure Plan* was approved by the USEPA in a letter dated June 29, 2000 and the NYSDEC in a letter dated September 11, 2000. The decommissioning work was documented in the *Commercial PCB Storage Area Closure Certification Report* submitted to USEPA and NYSDEC on April 11, 2006. The NYSDEC approved closure of the area in a letter issued on June 7, 2006 and the USEPA approved closure of the area in a letter dated July 19, 2006.

2.3 CORRECTIVE ACTION HISTORY

A series of investigations have been performed at and near the site under the corrective action program. A RCRA Facility Assessment (RFA) was completed in 1988. The results of the RCRA Facility Investigation (RFI) and supplemental investigations led to the completion of several ICMs, which are discussed in Section 3.0, the development of corrective action objectives, which are summarized in Section 4.0, and evaluation of potential corrective measures. During sampling performed in conjunction with closure of the Commercial PCB Storage Area, PCB-impacts to the Transportation Corridor, Depressed Dock, and Truck Bay were discovered. ICMs were taken to address these impacts. At the request of the NYSDEC, a Focused Corrective Measure Study was undertaken to evaluate potential corrective measures for the Transportation Corridor, Depressed Dock, and Truck Bay.

In March 2012, the NYSDEC made a determination on Final Corrective Measures for the site. This determination was based on the potential measures evaluated in the *Revised Corrective Measure Study Final Report*, which was prepared by URS and dated July 31, 2001 and the *Focused Corrective Measure Study*, which was prepared by URS and dated July 13, 2011. These Final Corrective Measures were incorporated into the July 2012 *373 Permit*. Several changes in site use and conditions occurred between preparation of the *Revised Corrective Measure Study Final Report* (*CMS Report*) and selection of the final corrective measures, and these were documented in the *CMIP*, which was prepared by URS and dated October 2, 2012. Several of the planned corrective measures were updated to reflect the modified site conditions. The *CMIP* also discussed informational gaps and the need for additional investigation before the design could be completed.

A brief description of the results from each phase of the corrective action process is provided below.

2.3.1 RFI and Supplemental Investigations

The RFI was conducted in 1998 and early 1999, and the results were summarized in the *RFI Report*, dated April 2, 1999. This work was done by Dames & Moore (D&M), which subsequently became part of URS. A series of supplemental investigations were performed to evaluate potential impacts to the storm sewer system both on and off site.

The RFI identified five locations for which Corrective Measures were warranted due to concentrations of PCBs in surface soil, subsurface soil, or sediment. In addition, the RFI identified an area with elevated concentrations of VOCs in soil and perched groundwater within a former rinse water tank excavation. The six areas identified as requiring Corrective Measures were:

- The surface soils near the rail spur;
- The former rinse water tank excavation;
- The sewer lines east of the building near the former rinse water tank;
- The area near the old oil water separator;
- The on-site storm sewers and drains; and
- The storm sewer along Milens Road.

The first five Areas of Concern (AOCs) are shown on Figure 3 along with the northern section of the Milens Road storm sewer. Off-site impacts include Two Mile Creek sediments, for which Interim Corrective Measures were undertaken (see Section 3.3).

The reports that summarize the results of the investigations that were conducted prior to the current 373 permit, which was issued in 2012, include:

- *RFI Report*, dated April 2, 1999, prepared by Dames & Moore;
- *Supplemental Sewer Investigation Report*, dated April 14, 2000, prepared by Dames & Moore;
- *Summary of Soil Sampling Results Supplemental Investigation*, dated April 23, 2001, prepared by URS;

- *Off-Site Storm Sewer Investigation Report*, dated July 13, 2001, prepared by URS;
- *RCRA Closure Certification Report,* dated September 19, 2002, prepared by URS;
- *Two Mile Creek Limited Sediment Investigation Report*, dated March 20, 2003, prepared by URS;
- *Closure Certification Report – Commercial PCB Storage Area*, dated April 11, 2006, prepared by URS;
- Letter report on confirmatory sample results from Two Mile Creek, dated May 19, 2008;
- Letter report on additional in-creek sampling performed in July 2008, dated August 5, 2008; and
- Letter report on additional bank soil sampling along Two Mile Creek, dated September 30, 2010, prepared by AECOM Technical Services.

2.3.2 Remedy Selection

Corrective Measures for the shop were selected through the CMS process. After completion of the RCRA Facility Investigation (RFI) in 1999, a *Corrective Measure Study Task I Report* (*CMS Task I* Report) was prepared by Dames & Moore and submitted to NYSDEC on December 3, 1999. The *CMS Task I Report* presented the Corrective Action objectives and identified potential Corrective Measure alternatives to be evaluated through the CMS process. During the CMS process several potential remedies for the affected Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) were evaluated and a remedy was suggested. The *Revised Corrective Measure Study Final Report,* which was prepared by URS and dated July 31, 2001, documents the evaluation.

At the request of the NYSDEC, a Focused CMS was performed that focused on the new AOCs discovered during closure of the PCB Work Area in the early 2000s. The *Focused Corrective Measure Study*, which was prepared by URS and dated July 13, 2011, documents evaluation of three potential corrective measures for the Transportation Corridor and the concrete floor slab (Truck Bay and Depressed Dock).

In November 2011, the NYSDEC published the Statement of Basis, which summarized the project information and proposed remedy evaluation to allow the public to review site information and participate in remedy selection. Following the public comment period, NYSDEC choose the Final Corrective Measures for the GE Tonawanda facility that were subsequently incorporated into the July 2012 *Part 373 Permit*.

2.3.3 Corrective Measure Implementation Planning and Pre-Design Investigations

In accordance with the 373 Permit, a *Corrective Measure Implementation Plan* (*CMIP*) was prepared (URS, October 2, 2012). The *CMIP* included: updating of some of the Corrective Measures based on changes in facility operations; outlining the design process; summarizing the potential data gaps; and presenting project plans such as the Health and Safety Plan and Quality Assurance Project Plan. The *CMIP* also discussed the permits and access agreements that would be necessary for the work and included an overview of the anticipated project schedule. The NYSDEC approved the CMIP with comments in a letter dated November 13, 2012.

The *CMIP* noted that evaluation of the concrete ramp to the depressed dock was necessary and that additional soil investigation might be proposed to refine the extent of PCB impacts in certain areas of the site and to determine the extent of soils that could be segregated for disposal purposes. Following submission of the *CMIP*, previously inaccessible portions of the

Transportation Corridor became accessible and were available for evaluation. Work plans for investigation of the concrete ramp, previously inaccessible areas of the Transportation Corridor, and soil were prepared and submitted to NYSDEC in January and February 2014. Following the initial round of soil investigation, several additional rounds of sampling were performed.

The scopes of the investigations that were proposed under the terms of the current 373 permit are described in these work plans, which were prepared by URS:

- *Pre-Design Investigation Work Plan for the Concrete Ramp and Transportation Corridor*, dated January 10, 2014;
- *Pre-Design Investigation Soil Work Plan*, dated February 14, 2014;
- *Work Plan for Additional Pre-Design Investigation*, dated July 21, 2014;
- *Proposed Supplemental Sampling for Additional Pre-Design Investigation*, dated October 7, 2014; and
- *Work Plan for Stepwise Investigation*, dated November 14, 2014.

On September 17, 2014, URS submitted the results generated during implementation of the *Pre-Design Investigation Work Plan for the Concrete Ramp and Transportation Corridor* and a portion of the *Pre-Design Investigation Soil Work Plan* to NYSDEC in a letter report entitled *Pre-Design Investigation Data*. The results generated during the remaining scope of work for the *Pre-Design Investigation Soil Work Plan* and the three other work plans were submitted to NYSDEC by AECOM in a summary letter report entitled *Additional Pre-Design Investigation Data* in February 2015. The results of the pre-design investigations indicated:

- The concrete ramp to the depressed loading dock was not impacted by PCBs;
- The western portion of the previously inaccessible portion of the Transportation Corridor was not impacted by PCBs;
- PCBs were detected at concentrations greater than 1 milligram per kilogram (mg/kg) in asphalt samples collected from the eastern sections of the previously inaccessible portion of the Transportation Corridor; and
- Shallow soil impacted by PCBs at concentrations greater than 1 mg/kg exists east of the GE property line on the DKP property in the area from the rail spur to the southeast GE property corner.

2.3.4 Summary of Results of Pre-Remediation Investigations

The contaminants of concern that have been detected at the site during the previous investigations include PCBs and to a lesser extent VOCs. The *CMID Report* presented a description of the results from prior investigations, including the pre-design investigation. In summary, the findings included:

- PCBs were detected in surface soil, which is defined as the top 12-inches or shallower, near the rail spur at concentrations greater than the cleanup objective of 1 mg/kg.

- PCBs were not detected in subsurface soil in the rail spur area at concentrations greater than the subsurface cleanup objective of 10 mg/kg.

- PCBs were detected at concentrations greater than their respective cleanup objectives in surface soil, subsurface soil, and groundwater samples collected in and near the former rinse water tank excavation.

- A few VOCs were also detected in subsurface soil and groundwater at concentrations greater than their respective cleanup objectives, but do not appear to be widespread.

- PCBs were detected at concentrations greater than their respective cleanup objectives in surface soil, subsurface soil, and groundwater samples collected near the sewer lines near the former rinse water tank excavation.

- A few VOCs were also detected at concentrations greater than their respective cleanup objectives in subsurface soil and groundwater samples in the vicinity of the sewer lines near the former rinse water tank excavation.

- PCBs were detected in surface soil near the old oil water separator (OWS), which is out of service, at concentrations greater than the surface soil cleanup objective of 1 mg/kg.

- Subsurface PCB impacts that exceed the subsurface cleanup objective of 10 mg/kg appear to be limited to the immediate vicinity of the old OWS and nearby sewer lines.

- The results of the investigations indicate that PCBs are present in the surface soil on the east side of the site in areas beyond the previously identified SWMUs and AOCs.

- PCBs were previously detected in the asphalt paved area south of the building (Transportation Corridor). The surface of the impacted portions of the paved area that were accessible in 2004 were removed and replaced with 1.5-inches of new asphalt that serves as a cover.

- Samples collected from previously inaccessible areas of the Transportation Corridor indicated a portion of the previously inaccessible asphalt contains PCBs at concentrations greater than 1 mg/kg.

- PCBs were not detected above reporting limits in concrete chip samples collected from the concrete ramp to the depressed loading dock.

- PCB containing sediments were detected in two on-site manholes (STMH-2 and STMH-3) during the previous investigations. In February 2002, PCB impacted sediments were removed from the on-site storm sewer manhole STMH-3, which exhibited the highest concentrations of PCBs in sediment.

- The floor drains in the shop floor were included in the corrective measure study process, and many were found to have PCB-impacted sediments. The facility made a number of changes in regards to the floor drains and process flows since the CMS stage of the project. Most floor drains were removed from the project scope during development of the *CMIP*. The trench drain and associate piping near the bay doors for the railroad tracks, the drain in the depressed loading dock and associated sump, and the trench drain in the ramp to the depressed dock were included in the *CMID Report*.

- PCB containing sediments were found in four storm sewer manholes (MH-1, MH-2, MH-3, and MH-4) along Milens Road during the off-site storm sewer investigation.

- A catch basin that was found near the southeast corner of the site on property owned by DKP has never been sampled, but likely received runoff from areas of PCB-impacted soil.

The selected remedy as modified through the design phase included:

- Excavation and off-site disposal of surface soil with PCB concentrations greater than 1 mg/kg from six areas east of the shop building, including the rail spur;

- Excavation and off-site disposal of subsurface soil with PCB concentrations greater than 10 mg/kg from the former rinse water tank excavation;

- Removal of the old oil water separator on the east side of the building, if feasible;

- Replacement of the storm sewer line that passes through subsurface excavation areas on the east side of the building;

- Removal of the sanitary storm sewer line, which was removed from service in the fall of 2012, that passes through subsurface excavation areas on the east side of the building;

- Removal and off-site disposal of sediments in floor drains and trench drains; and

- Removal and off-site disposal of sediments in select storm drain structures at and near the site.

3.0 SUMMARY OF PREVIOUSLY COMPLETED INTERIM CORRECTIVE MEASURES

GE has performed several Interim Corrective Measures (ICMs) at and near the site to address conditions discovered during the site investigations. Measures have been taken to remove PCB-containing sediment from storm sewer sediments, address PCB-impacts to porous surfaces to allow continued use in accordance with the Toxic Substance Control Act (TSCA) and to cover PCB-impacted asphalt, and address PCB-impacts to Two Mile Creek. Each of these measures is descried briefly below.

3.1 OFF-SITE AND ON-SITE STORM SEWER SEDIMENT REMOVAL

Following submittal of the RFI Report in April 1999, NYSDEC requested that GE perform a supplemental investigation of the on-site storm sewers. An investigation of the on-site storm sewers was performed in accordance with a NYSDEC-approved work plan and the results were summarized in the *Supplemental Sewer Investigation Report*, prepared by Dames & Moore (D&M) and dated April 14, 2000. Sediment containing PCBs and VOCs was found in on-site storm sewer catch basins and manholes with the highest concentrations found in the manhole (STMH-3) near the southeast corner of the shop building (Figure 3).

The NYSDEC requested that GE investigate the off-site storm sewers. In May 2001, GE collected samples from the off-site storm sewers in accordance with a NYSDEC-approved work plan and the results were summarized in the *Off-Site Storm Sewer Investigation Report*, which was prepared by URS and dated July 13, 2001. The report concluded that sediments in the storm sewer line along Milens Road contained PCBs that likely originated from the GE property and that the downstream line parallel to Ensminger Road did not contain much sediment or PCBs. The highest concentrations of PCBs were found in the first manhole along Milens Road (MH-1), which is near the southwest corner of the GE property (see Figure 3).

Removing sediments from on-site manhole STMH-3 and off-site manhole MH-1 before they had a chance to migrate was proposed in the cover letter submitting the *Off-Site Storm Sewer Investigation Report* to NYSDEC. The NYSDEC requested a work plan be prepared and the subsequently submitted *Manhole Sediment Removal Work Plan* was approved by NYSDEC. The removal of sediment from manholes STMH-3 and MH-1 was completed on February 28, 2002. The sediment removal activities were summarized in a letter report prepared by URS and dated May 17, 2002.

3.2 CONCRETE FLOOR SLAB AND ASPHALT PARKING LOT

During closure of the Commercial PCB Storage Area, sampling of the concrete slab at the adjacent Truck Bay and nearby Depressed [loading] Dock inside the building and the asphalt pavement of the Transportation Corridor south of the building was performed. Each of these features is shown in Figure 3.

Initial sampling indicated the Truck Bay and Depressed Dock areas had been impacted by PCBs, therefore seven stepwise sampling events were performed between November 2000 and March 2004. The results indicated that the surface of the concrete floor slab had been impacted by PCBs at concentrations greater than the cleanup objectives of 10 micrograms per 100 square centimeters (10 µg/100 cm^2) for wipe samples of surfaces or 1 mg/kg for concrete chip samples in the *Revised Closure Plan* for the Commercial PCB storage Area. The sampling results also indicated that the PCB impacts were limited to the upper two to three inches of the concrete and that the underlying soil has not been impacted. The results were documented in the April 11, 2006 *Commercial PCB Storage Closure Certification Report*.

After evaluating options for remediation of the shop floor, GE elected to use the double wash, double rinse procedure followed by the double epoxy coating of the concrete floor in contrasting colors and labeling the floor with the PCB (ML) mark, as 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 removal and replacement of the floor slab. Between December 2003 and May 2004, GE implemented the above described cleaning and epoxy coating of the shop floor to protect the on-site workers and minimize the potential for migration of PCBs into the environment. The April 11, 2006 *Commercial PCB Storage Closure Certification Report* describes the cleaning and coating activities in detail.

Initial sampling in the Transportation Corridor in November 2000 indicated that the asphalt south of the shop had also been impacted by PCBs. GE conducted a more extensive sampling program in the accessible portions of the asphalt area south of the shop in 2001 to evaluate the extent of impacts. The analytical results for the samples indicated several areas where PCBs were detected in surface of the asphalt pavement at concentrations above 1 mg/kg. No PCBs were detected in the subsurface asphalt or soil at the two locations where subsurface samples were collected. Asphalt ranged in thickness from approximately two to eight inches in thickness.

GE elected to remove the top inch of asphalt from the areas of the Transportation Corridor that were not used for equipment storage. After removal of the top inch of pavement in December 2004, several samples of the resulting asphalt surface were collected and analyzed for PCBs. The area was then repaved with 1-1/2 inches of new asphalt. The approximate extent of the asphalt overlay is shown in Figure 3. The April 11, 2006 *Commercial PCB Storage Closure Certification Report* describes the sampling and asphalt overlay activities in detail.

3.3 TWO MILE CREEK

Based on the results of the storm sewer investigations, the NYSDEC determined that PCB-impacted sediment might have migrated to Two Mile Creek through the storm sewer outfall at Oriskany Drive. As shown in Figure 4, this portion of the creek runs through the Sheridan Park Golf Course. At the request of NYSDEC, several phases of investigation of creek sediments and bank soils were performed on behalf of GE from 2004 to 2010 by URS and other consultants.

In 2008, the Town of Tonawanda undertook a drainage improvement project in the creek that included dredging part of the stream, removing trees and shoals, stabilizing stream banks, and replacing bridges. In conjunction with this work, PCB-impacted sediments were removed from select areas and confirmatory samples were collected. The samples demonstrated that removal met the cleanup objective of one part per million (ppm), or 1 mg/kg PCBs except for an area on the west bank. The NYSDEC determined that the sediment removal performed, along with the planned removal of additional bank soils, was sufficient and would serve as the final corrective measures for the facility in relation to Two Mile Creek.

In January 2015, the limited bank soil removal was performed in general accordance with the NYSDEC-approved *Two Mile Creek Limited Bank Soil Removal Work Plan*, which was prepared by URS and dated September 29, 2014. Confirmatory samples were collected following excavation and demonstrated that the cleanup objectives had been met. The work was summarized in the *Completion Report Two Mile Creek Limited Bank Soil Removal*, which was prepared by AECOM and dated June 17, 2015.

At the time the July 2012 *373 Permit* was issued, the sediment had been removed from the creek, and plans for removing the banks soils were in development. It was anticipated that Interim Corrective Measures for Two Mile Creek would be completed prior to the Corrective Measure Implementation at the facility. Therefore, Two Mile Creek was not included in the *Corrective Measure Implementation Plan* or the subsequent *Corrective Measure Design Report*, and a full description of the work has not been included in this *Corrective Measure Completion Final Report.*

4.0 CORRECTIVE MEASURE OBJECTIVES

The corrective action objectives for the site, which were established in the *CMS Task I* report and approved by the NYSDEC, are to:

- Remove or prevent contact with, or the off-site transport of sediments that contain PCBs at concentrations greater than the Recommended Soil Cleanup Objective (RSCO) of 1 mg/kg;

- Remove or prevent contact with, off-site transport of, and infiltration of precipitation through surface soils that contain PCBs at concentrations greater than the RSCO of 1 mg/kg;

- Remove or prevent contact with, and infiltration through, subsurface soils that contain PCBs or VOCs at concentrations greater than the RSCOs listed in Table 1; and

- Prevent or control the migration of perched groundwater that contains PCBs or VOCs at concentrations that exceed New York State groundwater standards.

Specific cleanup criteria for the PCBs and VOCs detected in the soil, sediments, and perched groundwater at the Tonawanda facility were presented in the NYSDEC-approved *Revised Corrective Measure Study Final Report* and are reproduced in Table 1.

Additional cleanup objectives were established in the *Revised Closure Plan* for the Commercial PCB Storage Area that was developed in accordance with the Toxic Substance Control Act (TSCA), and reiterated in the *Focused Corrective Measure Study*. The objective of the *Revised Closure Plan* was to ensure that surface of the facility that may have been impacted by operation of the Commercial PCB Storage Area were cleaned in accordance with the levels specified in 40 CFR Par 761 Subpart G – PCB Spill Cleanup Policy. Closure-related sampling investigations indicated the presence of additional historical PCB impacts at the facility, which were addressed to allow continued use of the PCB-impacted shop floor as authorized in 40 CFR Part 761.30(p) and to allow continued sue of the asphalt south of the shop as a low occupancy area (40 CFR Part 761.61(a)(4)(i)(B)).

5.0 SUMMARY OF SELECTED REMEDY AND DESIGN

The area of soil to be removed was expanded as a result of the pre-design investigations. The revised excavation plan that was included in the *CMID Report* is presented in Figure 5. Also shown are areas where the as-found concentrations of PCBs were at or greater than 50 mg/kg and would need to be segregated and managed separately for disposal as a New York State hazardous waste.

The final excavation design included removal of soil from a portion of the NYSDOT and Lamar properties north of the GE property and the DKP property east of the GE shop and south of the GE rail spur. The relationship of these properties to the GE property are shown on Figure 2. For the NYSDOT, Lamar, and DKP properties a more stringent cleanup criteria of 1 mg/kg for subsurface soil was included in the design. In addition to seeking access from the neighboring property owners for the remedial excavation, GE also sought access to additional property owned by DKP for the construction of a temporary access road.

The design, which was approved by NYSDEC with comments, included a confirmatory sampling program to document that the cleanup objectives were achieved. Samples were to be collected and analyzed for total PCBs in accordance with the Quality Assurance Project Plan (QAPP) prepared by URS in 2012 and submitted with the *CMIP*. The program included basic sample frequencies:

- One sample from approximately every 30 linear feet (LF) around excavation perimeter, collected approximately six inches below the top of excavation;
- One sample from approximately every 30 LF around the excavation perimeter of deeper (more than three feet in depth) excavations, collected approximately six inches above the bottom of excavation;
- On sample from every 900 square feet (ft^2) of excavation bottom.

The design included cleaning the on-site storm sewers and a number of interior drainage components (floor and trench drains) that are believed to historically have been connected to either the storm or sanitary drainage systems. As shown on Figure 6, the on-site storm sewer work included removing sediments from an interior trench drain in the rail bay area, three manholes, one exterior trench drain at the concrete ramp, an interior floor drain in the depressed loading dock, three catch basins, and the associated storm sewer lines. A section of roof drain line in the northeastern part of the building was conservatively included within the scope of work because of possible historic connection(s) to the line. The portion of the storm sewer line that was within the area of soil to be excavated would be removed with the soil and then replaced with new line. The design included post-cleaning video survey to visually assess if all sediment was removed.

The off-site storm sewer cleaning scope of work included cleaning the storm sewer line along Milens Road and four manholes. A catch basin on the DKP property near the southeast corner of the GE property, along with the anticipated discharge line to Milens Road, was conservatively added to the scope of work because of the proximity of the catch basin to impacted soils. The design included post-cleaning video survey to visually assess if all sediment was removed.

The scope of work also included a portion of the sanitary sewers on the GE property. A section of the sanitary sewer line originating at the old oil water separator and draining south before turning to the west was included in the work. The section immediately south of the old oil water separator had been removed from service by filling the line in place and the design called for complete removal of this line during the soil excavation work. The design included removing the old oil water separator, both the structure and contents. The design also included lining the sanitary sewer line from the north side of the building bump out near the southeast shop corner to the sanitary manhole. While no Corrective Measures were required for the new oil water separator, the design included permanently removing it from service by cleaning the interior of the structure and filling it with flowable fill.

6.0 IMPLEMENTATION

This section discusses the remediation activities as well as pre- and post-remediation activities.

Following NYSDEC's acceptance of the *CMID Report* in a letter dated February 23, 2015, GE proceeded with contracting the work. Clean Harbors Environmental Services, Inc. (CHES) of Norwell, Massachusetts was selected to perform the remedial work and Waste Management was selected to transport and dispose the remedial waste. AECOM provided oversight of the remedial work. CHES relied on several subcontractors, including Buffalo Blacktop & More (BB) for the concrete and pavement work. Waste Management used Page E.T.C. of Weedsport, New York and Tonawanda Tank Transport of Buffalo, New York for transport of hazardous waste to CWM Chemical Services, LLC Landfill in Model City, New York, and Silverole Trucking of Rochester, New York for transport of nonhazardous waste to Waste Management of New York - High Acres Landfill in Fairport, New York.

Remedial construction was planned to begin in late May 2015, but the start of work was delayed while potential impacts to the Northern Long Eared Bat (NLEB) were evaluated and determined to be incidental. CHES mobilized to the site beginning in the first week of August and substantial demobilization occurred in December 2015. Work of a non-remedial nature to remove and reconstruct a trench drain in the rail bay area continued throughout the winter and into spring 2016.

6.1 ACCESS AGREEMENTS AND PROJECT PERMITS

Prior to the start of remedial work, GE and CHES obtained the access agreements and permits needed to perform the remedial work. The access agreements and permits that were obtained for the project are described below.

6.1.1 Access Agreements

Access was obtained from owners of adjacent properties owned by Lamar, DKP, and the Town of Tonawanda to perform the work. Figure 2 shows the location of the adjacent properties.

For the Lamar property, a dialogue with the owner's representative was opened prior to beginning contracting activities. It was agreed that the pre-existing access agreement between GE and Lamar that allows Lamar to access their billboard across the GE property via a paved access road along the east side of the shop building could be used for the remedial work. GE and Lamar agreed that GE would provide Lamar access to their billboard for maintenance and repair activities throughout the work. On behalf of GE, AECOM notified Lamar via email on November 25, 2015 that the work was substantially complete and that they could resume accessing the billboard by the GE access road.

For the DKP property, a Right of Entry Agreement for Remedial Activities was executed in May 2015. The agreement allowed GE to excavate PCB-impacted soil on the DKP property and to construct a temporary access road. The purpose of the road was to allow project traffic to travel around the exclusion zone to facilitate the work and restoration activities, as well as to provide Lamar personnel with alternate means of access to their property during the remedial work. The agreement was extended in December 2015 to cover potential spring 2016 restoration completion activities that may be necessary, such as reseeding.

For work in the Town of Tonawanda storm sewers along Milens Road, the town requested a description of the work and the health and safety protocols that would be used to perform the work. After reviewing the materials provided by CHES via email on September 9, 2015, the town granted CHES permission to proceed with the work in an email dated September 28, 2015.

6.1.2 Project Permits

CHES was required to obtain two permits for the work. One permit was needed to access the NYSDOT property for excavation of impacted soils. The second permit was needed from the Town of Tonawanda for discharge of remedial wastewater to the sanitary sewer system. Copies of these permits are provided in Appendix B.

6.1.2.1 NYSDOT

The dialogue with NYSDOT was started before a contractor was selected. On behalf of GE, AECOM provided a description of the planned work and select drawings from the remedial design. These materials were reviewed by NYSDOT personnel in the winter and early spring of 2015. On May 4, 2015, the NYSDOT responded with questions regarding the work, including whether potential impacts to the NLEB, which had recently been added to the federal Threatened Species list, had been evaluated. Remedial excavation procedures and waste management for excavation of soil with the invasive species *Phragamites* were reviewed with respect to NYSDOT policies and NYSDOT was provided with more detailed information in an email dated June 24, 2015. In addition, several notes were added to the project plans to address NYSDOT comments.

AECOM performed a tree inventory at and near the planned excavation area and evaluated the project area with respect to habitat for the NLEB. The evaluation concluded that habitat provided was poor and that while some incidental take might occur with cutting of trees, it was unlikely to adversely affect the bat population, and given the nature of the project and small area of cutting, the project would qualify for a 4(d) exemption. In a letter dated July 9, 2015, the Fish and Wildlife Service concurred that the project qualified for the exemption.

On September 22, 2016, the NYSDOT issued Permit No. 20150552401 jointly to GE and CHES. On March 4, 2016, ACEOM notified NYSDOT that work under the permit was completed.

6.1.2.2 Town of Tonawanda

An Industrial Discharge Permit was required from the Town of Tonawanda to discharge remedial wastewater into the town's sanitary sewer system. The dialogue with the town's wastewater pretreatment coordinator was started before a contractor was selected. CHES submitted a complete application to the Town of Tonawanda on September 21, 2015. The Town of Tonawanda issued Permit No. 689-S effective on September 30, 2015 with an expiration date of October 31, 2015. A copy of the permit is provided in Appendix B. The permit required treatment as-needed by batch to achieve PCB Aroclor concentrations below 0.065 micrograms per liter (µg/L) with results submitted to the Pretreatment Coordinator. The Town allowed discharges beyond the period of the permit because nearby compliance sampling by the town had restricted CHES allowable periods of discharge.

6.2 MOBILIZATION AND PREPARATION

CHES began mobilization to the site on August 3, 2015. Prior to mobilizing, the contractor prepared and submitted for GE's review a project-specific *Health and Safety Plan*. A project kickoff meeting was held on August 4, 2015. In addition to discussing the remedial work itself, coordination of the remedial work and regular facility work activities were discussed. Daily health and safety meetings were held while CHES and/or AECOM were onsite, and the GE shop health and safety coordinator attended most meetings.

Initial site preparations included setting up a support area in the south east part of the GE parking lot and clearing brush to allow installation of a temporary fence beyond the excavation limits. Hay wattles were used for erosion control around the perimeter of the excavation. The photographic log in Appendix C includes photographs of site preparation activities. After the temporary fence was installed, the existing facility fence on the east side of the GE property was removed. Temporary barricades were used throughout the work to delineate remedial work areas and hinder incidental trespass to those areas, as well as for establishing exclusion and decontamination reduction zones. These temporary barricades were adjusted throughout the project as work progressed. Temporary barricades were also used around deeper excavations during those phases of the project.

Trees and brush in the area to be remediated and the area of the planned temporary access road were cleared. Woody material was removed without disturbing the underlying soil. The removed material was taken to the northeast part of GE property and a chipper was used to resize the material (Photograph 5). Smaller brush was removed using a forestry attachment mounted on a skid steer (Photograph 6).

As part of the preparation activities, CHES identified sources of potential clean fill materials and submitted samples for analysis, including the stone used to construct temporary access road. Clean fill is discussed in Section 6.7. ACEOM supported GE in establishing waste profiles for the nonhazardous and hazardous soil. Samples collected during the pre-design investigation were supplemented with four additional soil waste characterization samples collected during mobilization. Table 2 is a summary of all samples collected during the work.

In order to construct the temporary access road, an area of PCB-impacted soil adjacent to the GE parking lot was excavated. This work was done in general accordance with the procedures described in Section 6.3.3. Removed soil was loaded into a truck for transport to the High Acres landfill. Confirmatory samples (CS-1 through CS-6) were collected and submitted for PCB analysis with rapid turn around time (TAT). After receipt of analytical results, geotechnical fabric and clean stone were placed to construct the temporary road (Photographs 7-9).

Site preparation activities included abandoning two monitoring wells (MW-2 and MW-5), which are shown on Figure 5, that were within the planned excavation area and extended beyond the planned excavation depth. CHES engaged Nature's Way Environmental Consultants and Contractors, Alden, New York, to assist with the well decommissioning. On September 2, 2015, each well was abandoned by lowering a tremie pipe to the bottom of the screen and filling the screen and riser to grade with a mixture of Type 1 Portland cement, bentonite and water as recommended by NYSDEC's CP-43: Groundwater Monitoring Well Decommissioning Policy. Photograph 15 shows the filling of monitoring well MW-5. The upper portion of the well riser for MW-5 was removed during soil excavation, which was after the grout had set. Although not originally planned, the full grouted length of monitoring well MW-2 was removed during the remedial excavation. Two other wells (MW-1 and MW-3), which are also shown on Figure 5, were completely removed during soil excavation.

Additional mobilization activities occurred prior to burst lining the sanitary sewer line, which is discussed in Section 6.3.4, and prior to undertaking the storm sewer cleaning, which is discussed in Section 6.3.5. A single fractionalization tank was initially set up in the support area to receive water in the event that an excavation needed dewatering. Two additional tanks and a portable waste water treatment system were subsequently brought to the site. Wastewater management and treatment is discussed in Section 6.4.

6.3 REMEDIATION ACTIVITIES

Following site preparation, soil excavation began in the northern part of the remedial area and proceeded generally to the south. Soil on the NYSDOT property remained in place until after the NYSDOT access permit was obtained. Burst lining of the sanitary sewer and cleaning of the storm sewers occurred concurrently with the excavation work. Confirmatory samples were collected as soil removal progressed, with analysis of samples from critical areas (such as deep excavations or areas where CHES wanted to resume use of the area for site traffic) being expedited. Additional excavation, either laterally or vertically, occurred as-needed to meet project cleanup objectives. CHES engaged a licensed surveyor, Nussbaumer & Clarke, Inc. (NCI) of Buffalo, New York, to: layout the planned excavation areas, including areas where soils were to be segregated for disposal; survey the completed excavation; survey confirmatory sample locations; and survey the restored site conditions.

Backfilling of excavated areas began in the northern part of the site and proceeded south after completion of the soil removal was verified through the confirmation sampling program. Clean fill was transported around the active remedial excavation zone by using the temporary access road.

Milling and top coating of the asphalt “L” in the Transportation Corridor and limited patching of the pavement in Transportation Corridor were the last remedial tasks performed. This sequencing allowed for less equipment in the support area and less remediation-related site traffic complicating this portion of the work.

Decontamination of equipment occurred throughout the work and is described in Section 6.5. In general, work was sequenced to limit contact of equipment with hazardous concentrations of PCBs. Community Air Monitoring was performed (see Section 6.3.1) in general accordance with the *Community Air Monitoring Plan* submitted as an attachment to the January 2015 *CMID Report*. AECOM collected post-excavation confirmation samples periodically throughout the excavation phase of work.

6.3.1 Air Monitoring, Dust Control and Health and Safety

Air monitoring activities included both community air monitoring as described in the *Community Air Monitoring Plan* (*CAMP*) and work zone monitoring in accordance with health and safety plans. The remedial contractor was responsible for implementing the NYSDEC-approved *CAMP* and AECOM provided support.

Two air monitoring units (AMUs) were routinely set up during excavation activities to measure upwind and downwind VOC and particulate concentrations, as called for in the *CAMP*. Each unit consisted of a RAE 3000 photoionization detector (PID) and a Dusttrak II 8530 Dust/Aerosol monitor. Data collected was uploaded to a cloud based storage system and could be reviewed by authorized users in real time. The system was programmed to alert several team members in the event of an action level was reached.

Based on the prevailing southwest winds, the upwind AMU was generally set up near the southeast corner of the GE parking lot (Photograph 35) and the downwind AMU was generally set up adjacent to the gravel road to the Lamar billboard (Photograph 47). During the early and later stages of the project there was greater variability in the AMU setup locations because of the smaller active remedial area. Table 3 provides a summary of the AMU locations.

On days when north and northeast winds were present, the typical AMU locations were reversed. Wind shift during the day generally resulted in the AMU's being moved to provide accurate upwind and downwind data recording. On a few days with short term wind reversals or variable wind conditions, the AMU locations were not changed, but the wind directions were noted in the field notes.

The air monitoring data is provided in Appendix D. As shown, particulate concentrations rarely exceeded *CAMP* guidelines, and then only during brief periods of time. The occasional short term particulate exceedances were generally the result of truck traffic on site roadways. A dedicated site water truck was used to wet down roads and work areas proactively upon observation of very limited visible dust being generated (see Photograph 32) or if trucks delivering clean fill were observed to have tracked mud from the temporary access road onto the GE parking lot. Project related dust was not observed leaving the GE property/project area. Dust was, however, frequently seen being generated by others on off-site neighboring properties, and the dust from these properties was sometimes measureable at the upwind AMU.

PIDs were used to assess remedial worker exposure during soil excavation near the former rinse water tank excavation, where VOCs were historically present. No action levels were exceeded.

Work was performed in accordance with project-specific Health and Safety Plans (HASPs) prepared by CHES and AECOM. The AECOM plan was based on the plan prepared by URS in 2012 and submitted to NYSDEC as an attachment to the CMIP. This plan had been reviewed and updated annually. The AECOM plan was provided to CHES for informational purposes as they prepared their own HASP. The personnel that conducted remedial work at the site met the appropriate training requirements as identified in 29 CFR 1910.120.

The remedial construction was performed with modified Level D personal protective equipment (PPE). The level of PPE worn was task-specific. Disposable booties or reusable boot covers (used in conjunction with a boot wash station) and task-appropriate gloves (such as nitrile or leather) were worn for most remedial work, along with steel toed boots, hard hat, safety glasses, and traffic vest. Upgrades to Tyvek coveralls, splash resistant coveralls, face shields, or respirators were made as appropriate by task (such as potentially dirty hand labor, equipment decontamination, etc.). CHES maintained exclusion zones and decontamination reduction zones throughout the remedial work. Waste generated in the decontamination reduction zone was containerized and disposed with other remedial waste (Section 6.6).

6.3.2 Confirmatory Sampling Program

The confirmatory sampling program that was developed during the design (Section 5.0) was used to evaluate whether soil that remained after excavation met the project cleanup objectives. AECOM collected the confirmatory soil samples with the support of CHES. Samples were collected using either disposable sampling equipment or with reuseable equipment that was decontaminated with Citrisol and laboratory supplied distilled and deionized water between sampling points. Flags and/or spray paint were used to identify sample locations until they could be surveyed. Each soil sample was assigned a unique identification that began with letters “CS” for confirmatory sample. Samples were submitted under chain of custody protocol to Test America Laboratories, Inc. in Amherst, New York for PCB analysis by EPA Method 8082A.

Duplicate samples, rinse blank samples, and matrix spike/matrix spike duplicate samples were collected in accordance with the Quality Control Project Plan (QAPP) that was prepared in 2012 and submitted to NYSDEC as an appendix to the *Corrective Measure Implementation Plan*. Category B deliverables were requested from the laboratory for all confirmatory samples and the data underwent validation. Copies of the analytical reports are provided in Appendix E and the *Data Usability Summary Reports* are provided in Appendix F. No data were rejected and the data is of sufficient quality to be deemed ‘usable’. The PCB analytical results for confirmatory soil samples and corresponding duplicate samples, along with data qualification flags when appropriate, are summarized in Table 4. The PCB analytical results for equipment rinse blank samples are summarized in Table 5.

The first six samples (CS-1 through CS-6) were collected from the area initially excavated to construct the temporary access road and the adjacent area. AECOM subsequently set up a 30-foot by 30- foot grid system as the basis for collecting base of excavation samples. The grid was set up in line with the northern wall of the GE shop building with the first row of samples collected 15 feet east of the building. The grid was not followed strictly, but was used as a guideline for sample collection. In order to get post-excavation sample coverage over properties owned by multiple entities and allow reasonable dispersion of bottom samples over different dig depths, alternate spacing was followed in some areas, such as the NYSDOT property, Lamar property, DKP property, and the GE sewer trench area. Efforts were made to maintain coverage of one base of excavation sample per 900 sf of excavation area. Upper sidewall perimeter samples were collected from approximately 6-inches below ground surface from approximately every 30 LF of excavation, starting at the northeast corner of the GE shop building and proceeding clockwise. Sample spacing was adjusted slightly in some locations in an effort to get reasonable coverage in the irregularly shaped excavation design. When a shallow perimeter sample location was against a structure (such as samples CS-9, CS-48, CS-109, CS-114, and CS-115) the sample was collected from the base of the excavation adjacent to the shop building foundation. Lower sidewall samples were collected from the perimeter of areas three feet or greater in depth. The lower sidewall samples were collected from approximately 6-inches above the base of excavation from approximately every 30 LF of excavation. Figures 7 through 9 show confirmatory sampling locations and summary results for samples from the rail spur area, east of the shop, and east of the Transportation Corridor, respectively. The results for all confirmatory samples are summarized in Table 4.

The analytical results for the confirmatory samples were evaluated with respect to the project cleanup objectives. In accordance with the actions described in the *CMID Report*, if a sample did not meet the cleanup criteria, additional material would be excavated using the following rules:

- If a sidewall sample fails to meet cleanup criteria, the reach of the excavation represented by that sample will be expanded an additional five to 10 feet outward at the same depth, and then resampled.

- If a bottom sample fails to meet cleanup criteria, the area represented by that sample will be excavated an additional six inches deeper and then resampled.

Half the distance to the nearest sample that met cleanup objectives was generally used as a guideline for additional excavation. The horizontal extent of excavation was expanded in nine locations in response to upper sidewall samples not meeting cleanup objectives. Following each additional excavation, new sidewall samples were collected and were each given a unique identification. The samples in Table 4 are grouped by location, and the sample type descriptions include information regarding whether a sample is a step out location related to a prior sample point.

The vertical extent of excavation was extended deeper in five general areas as a result of base samples not meeting cleanup objectives. Following each additional excavation, new base samples were given a unique identification. Frequently for the deeper samples collected in the sample location a suffix such as “A” was added to the original sample id. The summary data boxes in Figures 7 through 9 group together results for the initial and, when applicable, deeper samples. Similar to the step out samples, deeper base samples are grouped on Table 4 following the parent sample.

Table 4 and Figures 7 through 9 provide information on whether the soil represented by a sample remains or was excavated. Table 6 presents the confirmatory soil sample data for only those samples representing remaining (post-remediation) conditions. Figures 10 through 12 provide information on post-remediation conditions.

6.3.3 Soil Removal and Material Management

Soil removal began east of the GE parking lot on August 20, 2015 so that the temporary access road could be constructed across a remediated area. Following this initial excavation effort the site preparation activities resumed. Soil excavation began in earnest with hazardous soils in the rail spur area on August 25, 2015 and was completed on October 21, 2015. Details about soil removal for specific AOCs follows this summary description of the general procedures used throughout the work.

The project included excavation, management, and disposal of soil with lower levels of PCBs (less than 50 mg/kg), which were characterized as non-hazardous waste, and material with concentrations of PCBs at or greater than 50 mg/kg PCBs that characterized the material as a New York State hazardous waste. Materials were managed and disposed based on as-found concentrations. Figure 5 shows the areas of soil with concentrations of PCBs at or greater than 50 mg/kg that were segregated for disposal as a hazardous waste as well as the planned limits of excavation. Waste transportation and disposal, along with the additional samples collected for waste characterization purposes, are discussed in Section 6.6.

Work was sequenced to minimize the use of stockpiles and to minimize the need to decontaminate equipment. For the rail spur area the excavation approach was to first remove the soil piles and surface treatments with as-found concentrations of PCBs that deemed the removed materials a hazardous waste, followed by removal of soils characterized as nonhazardous waste. As shown in Photograph 10, plastic sheeting and/or fabric was placed between equipment and impacted soil to minimize the need for decontamination. Trucks were inspected after loading and spilled material was removed and the truck decontaminated, as needed. Trucks were kept on existing hard surfaces to the extent possible, and on fabric when the truck was off of hard surfaces.

Whenever equipment, or portions thereof, moved from an area of higher PCB impacts to an area of lower or no PCB impacts the equipment was visually assessed and appropriate decontamination measures were implemented (such as physical removal of bulk residuals followed by wet cleaning). Interim cleaning, such as of the excavator bucket, was generally performed over a stockpile or truck so that decontamination materials (solid and liquids) were incorporated into the solid hazardous or non-hazardous (as appropriate) waste streams.

Some stockpiling of excavated material was necessary because of restrictions related to truck traffic into the Model City Landfill and the distribution of PCBs in soils. When possible, soils were stockpiled within excavation areas of like materials. For example, after removing shallow soil with low levels of PCBs from the former rinse water tank excavation area, the depressed area was used to stage hazardous soils for loadout, and to store materials pending loadout. When not in use, stockpiles were covered with plastic sheeting. When conditions would not allow piles to be placed on top of like-waste, two layers of plastic sheeting were laid down and the stockpile was constructed on top of the sheeting. Wattles were placed around at-grade stockpiles.

The weather was dry for much of the time that soil excavation was underway. This limited the need to minimize runoff and run in conditions and dewater excavations. Precipitation that ponded in areas that had been excavated but not filled and areas where no excavation or ground disruption had occurred was allowed to evaporate. In active areas, or when water needed to be removed from clean areas, CHES used a trailer mounted vacuum tank to collect the water and transport it to the onsite water treatment system.

6.3.3.1 Rail Spur Area

Soil excavation began in the rail spur area following construction of the temporary access road. Soils on the NYSDOT property were left in place until the access permit was obtained. Soil removal began with the soil piles and other areas of known (or presumed) elevated concentration of PCBs, such as the concrete, asphalt, and exposed ballast stone. The concrete slab near the rail bays was broken up using a hydraulic hammer attachment on the excavator. Water was applied prior to starting the hammer operations and throughout the work as needed to inhibit dust generation (see Photograph 3 in Appendix C). A mini excavator equipped with a small bucket and laborers using hand tools were used to remove the ballast stone between the railroad ties to the full depth of the ties or until the planned excavation depth of one-foot below grade was reached, whichever came first. The railroad ties and rails remained in place. Photographs 10 through 14 and 18 show various stages of excavation in the rail spur area.

Figure 7 shows the final limit of excavation, areas of additional soil removal, and presents a summary of confirmatory sampling locations and results for the rail spur area. Based on the confirmatory sample results for samples from the rail spur area, five areas were targeted for additional soil removal. These five areas included:

Sample Area	**Additional Excavation**	**Result After Additional Excavation**
CS-7	Step out 10 feet by 10 feet, 1 foot deep.	< 1 mg/kg met (CS-73-75).

Sample Area	Additional Excavation	Result After Additional Excavation
CS-9	Remove additional foot for area the full width between tracks and ½ distance to next sample.	< 1 mg/kg met (CS-9A).
CS-24 & CS-25	Remove additional 6-inches from area based on ½ the distance to the next sample.	< 1 mg/kg met (CS-24A & CS-25A).
CS-31 & CS-32	Remove additional 6-inches, and step out to extend and square off excavation.	< 1 mg/kg met (CS-31A, CS-46 & CS-47).
CS-79	Step out as far as could reach under fence with level bottom (resulting in 1.5 feet dug because of ground slope), and ½ distance to next sample.	< 1 mg/kg met (CS-116).

Excavation on the NYSDOT property and the additional excavation north of railroad tracks was accomplished by using clean stone to construct a ramp over the tracks at an area where analytical results indicated cleanup objectives had been met. CHES used a small dump truck lined with plastic to transport the soil over the tracks and bring it to the then current leading edge of excavation and loadout area. A combination of plastic sheeting and fabric were used to prevent cross contamination and minimize the need to decontaminate equipment by preventing the truck from contacting potentially impacted soils. Photograph 26 shows the additional excavation in the CS-24 and CS-25 area. In the background, the clean stone ramp constructed over the railroad track can be seen.

6.3.3.2 Area East of Shop Building

Following the soil removal work in the rail spur area, the excavation proceeded south to the area east of the shop building, which includes several AOCs. As shown on Figure 5, the remedial design of this area included:

- Excavation of soil near the old oil water separator and removal of the unit (see Section 6.3.4);
- Excavation of soil along the storm sewer and former sanitary sewer, and removal of sanitary and storm sewers (see Section 6.3.4 and 6.3.5) where they pass through the soil excavation area;
- Excavation of soil in the former rinse water tank excavation area; and
- Excavation of adjacent areas where surface soil and surface treatments were impacted by PCBs.

The Corrective Measure design included segregating soils and debris with known or assumed concentrations of PCBs at or greater than 50 mg/kg for disposal as hazardous waste. The results of the soil investigations performed at the site indicated that the higher concentrations of PCBs were found in certain depth ranges and not throughout the area. In order to facilitate the work in the complex excavation area, additional soil was conservatively segregated for disposal as hazardous waste.

Excavation east of the shop began with the vegetated areas and narrow area between the shop building and the containment structure for the above ground storage tanks (ASTs). Shallow soil with low concentrations of PCBs was removed first. An area for staging hazardous waste was created by excavating the upper portion of the footprint of the former rinse water tank excavation to the depth where elevated concentrations of PCBs were present. Perched water was encountered and removed from the area with the trailer mounted vacuum tank. The wastewater was subsequently combined with other project related wastewater for treatment (see Section 6.4). Deeper excavation along the sewer lines and building foundation followed. In the area between the building and the ASTs where direct loading of trucks was not possible, soil was moved and staged prior to shipment. Soil and debris with higher concentrations of PCBs was staged in the former rinse water tank area for loadout as hazardous waste, and soil with lower concentrations of PCBs was moved to the north. Photographs 16, 19, and 22 show the excavation progressing. Photograph 19 shows the pre-remediation storm and sanitary sewer pipes along with the old oil water separator. In order to remove the sewers pipes and underlying bedding material, the final excavation was slightly deeper than originally planned. Photograph 25 shows the pipe trench following excavation with temporary piping in place to convey storm water from the roof drains. Confirmatory sample results for samples from the bottom of the trench, including from beneath the old oil water separator, indicate the remaining material contains PCBs at concentrations less than 1 mg/kg. Additional soil was excavated adjacent to the AST subsequent to the date of Photograph 25.

The former rinse water tank excavation appeared to be fully excavated during the 2015 work based on examination of the sidewalls and base. As shown in photograph 28, the ballast pad for the former rinse water tank had been left in place during prior work. The two-foot thick concrete pad was broken into pieces (Photograph 29) and the pieces were removed (Photograph 30) resulting in a 12 foot deep excavation. The results for nine confirmatory samples collected from the sidewalls and base of the excavation document that the remaining material around the former rinse water tank excavation pit contains less than 1 mg/kg of PCBs.

Excavation beyond what was planned (shown in Figure 5) occurred in seven areas east of the building. As discussed above, the sewer trench was dug slightly deeper than planned in order to remove all bedding material based on visual inspection. A clay pipe segment oriented northeast to southwest was encountered between the former rinse water tank pit and the sewer trench near the corner of the shop building and building bump out. This pipe was removed along with the bedding material because it was within the perched groundwater. This clay pipe had been partially filled with concrete prior to the 2015 activities, and there is no information available about this pipe. Excavation for removal of the pipe resulted in the removal of soil represented by upper sidewall sample CS-72. The replacement sidewall sample for the additional excavation was CS-117, which demonstrated that the PCBs less than 1 mg/kg criteria had been met.

Figure 8 shows the final limit of excavation, areas of additional soil removal, and presents a summary of confirmatory sampling locations and results for the area east of the shop building. Based on the confirmatory sample results for samples from the area east of the building, five other areas were targeted for additional soil removal. These five areas included:

Sample Area	Additional Excavation	Result After Additional Excavation
CS-68 & CS-70	Two additional rounds of excavation occurred west of the AST containment structure resulting in an estimated 3 to 4 feet of material removed.	< 1 mg/kg met (CS-119A & CS-118A, respectively).
CS-71 & CS-87	The pipe trench sidewall was expanded to the east to the extent practical given the proximity of the AST structure (Photographs 33 and 34).	Subsurface soil with greater than 1 mg/kg PCBs remains (CS-103) at the southeast corner of the containment structure and demarcation fabric was placed prior to backfilling. PCBs were not detected in upper sidewall CS-102.
CS-59, CS-62, CS-63, & CS-65	Remove additional 6-inches for area based on ½ the distance to the next sample. Soil in area of influence of sample CS-65 was segregated for disposal (Photograph 27).	< 1 mg/kg met (CS-59A, CS-62A, CS-63A & CS-65A).
CS-67 & CS-106	Step out five feet and 1 foot deep for area based on ½ the distance to the next sample.	< 1 mg/kg met (CS-90 & CS-106A).
CS-109	Two additional rounds of excavation for total removal depth of 3 feet around the northeast corner of the building bump out for area based on ½ the distance to the next sample (Photograph 38).	< 1 mg/kg met (CS-109B).

Several pipes were encountered during excavation activities. The former underground piping between the ASTs and the shop building was found. The pipes were cut and capped near both structures. In addition, a clay pipe was encountered that is believed to be the former storm sewer line that was re-routed when the shop addition was constructed in 1979. The end of this pipe was broken during excavation and was plugged with concrete.

6.3.3.3 Area East of Transportation Corridor

Excavation continued to proceed south to the impacted soil east of the Transportation Corridor. This area had a limited area of soil that exhibited PCB concentrations that would require removed soil be segregated for disposal (see Figure 5). The area of higher as-found concentrations of PCBs was excavated in conjunction with hazardous soils east of the shop, which made excavation east of the Transportation Corridor less complex than the other areas. A series of concrete piers was encountered within the excavation limits. These piers were left undisturbed with the surrounding soil excavated to the planned one-foot dig depth.

Figure 9 shows the final limit of excavation, areas of additional soil removal, and presents a summary of confirmatory sampling locations and results for the area east of the Transportation Corridor. Based on the confirmatory sample results for samples from the area east of the Transportation Corridor, six areas were targeted for additional soil removal. The six areas included:

Sample Area	Additional Excavation	Result After Additional Excavation
CS-126	Step out five feet, 1 foot deep for area based on ½ the distance to the next sample.	< 1 mg/kg met (CS-140).
CS-132	Step out (east and south) five feet, 1 foot deep for area based on ½ the distance to the next sample. Irregular “L” shape because failed sample was at excavation corner.	< 1 mg/kg met (CS-141).
CS-136	Step out (east and south) five feet, 1 foot deep for area based on ½ the distance to the next sample. Irregular “tetris-type” shape because failed sample was near excavation corner.	< 1 mg/kg met (CS-147).
CS-137	CS-137 was at the southeast corner of the planned excavation. Due to the topography and the nearby catch basin the initial additional excavation included a step out 5 feet to the east, and excavation of a large low area to the south near the catch basin and to the west along the southern GE property line.	Mixed results. < 1 mg/kg for base, west wall and south wall (CS-144, CS-145 & CS-143, respectively). >1 mg/kg along edge of pavement on GE property (CS-146). Demarcation fabric placed (Photograph 41). > 1 mg/kg along east sidewall (CS-142); additional removal.
CS-142	Step out five feet, 1 foot deep for area based on ½ the distance to the next sample.	> 1 mg/kg along east sidewall (CS-148); additional removal.
CS-148	Step out five feet, 1 foot deep for area based on ½ the distance to the next sample.	< 1 mg/kg met (CS-149).

6.3.4 Sanitary Sewer Work

The sanitary sewers at the GE shop historically included connections to process sewers and floor drains, as well as the two (old and new) oil water separators. Over the years, many changes to shop operations have been made which resulted in some parts of the system becoming obsolete and/or partially decommissioned. The Corrective Measure work included actions that were not specifically driven by PCB impacts. Work related to the sanitary sewers included:

- Removal of the old oil water separator during soil excavation;
- Removal of a section of the sewer line from the old oil water separator to the north side of the building bump out at southeast corner of the shop, which had previously been filled in place in conjunction with the soil excavation (see Section 6.3.3.2);
- Removal of a section of sanitary sewer line and clean out south of the building bump out;

- Burst lining of the sanitary sewer from near the southeast corner of the shop west to the on-site sanitary manhole (SANI-1, see Figure 3);

- Installing new underground plumbing connection from the new burst line into the shop and reconfiguring the above grade plumbing to the upstairs restroom in the southeast corner of the shop;

- Decommissioning the section of sanitary sewer line under the building bump out by filling it with flowable fill; and

- Filling the new oil water separator with flowable fill.

Figure 13 provides a summary of the 2015 on-site sewer work. Two floor drains that are believed to have historically connected to the new oil water separator on south side of the shop and then the into the sanitary sewer system were also cleaned. These activities are discussed in 6.3.5 because the cleaning of the floor drains was undertaken in conjunction with the storm sewer work.

CHES subcontracted with Roy's Plumbing, Heating and Cooling Co. (Roy's Plumbing) to assist with both the sanitary sewer and storm sewer plumbing work. The burst lining approach was proposed by CHES instead of a sleeve line method due to the small diameter of the pipe and the length of pipe involved. The burst lining approach required: a pit be excavated to provide access to the east end of the sewer (Photograph 21 in Appendix C); a test pit be excavated to verify relationship of the pipe to the concrete ramp to the depressed dock; excavation to install a new plumbing connection (Photograph 24); and decommissioning a section of sanitary sewer under the building bump out at the southeast corner of the shop (Photographs 23 and 42).

The removal of the old oil water separator and filled sanitary line was performed by CHES in conjunction with the soil excavation east of the building. Both the filled pipe and the concrete oil water separator structure were assumed to be hazardous waste and were managed and disposed accordingly. Photograph 19 shows excavation near the old oil water separator prior to removing the structure. As shown in Photograph 22, the gravel bedding below the structure appeared to be discolored. The material was removed, and the soil excavation was extended to the building footings. As shown in Photograph 25, the excavation bottom at completion appeared to be in undisturbed clay. Confirmatory sample CS-55 was collected from soil beneath the old oil water separator and documents that clay beneath the former old oil water separator contains PCBs at concentrations below 1 mg/kg.

Following removal of the filled sanitary pipe east of the building, the portion of the sewer that extended beneath the building bump out was capped with temporary plug, and was subsequently permanently decommissioned. On October 28, 2015, approximately 90 feet of 4-inch diameter clay sanitary sewer pipe that lay under the southeast section of the building was decommissioned by filling the pipe with flowable fill. The fill was placed in the temporary pipe at the north wall of the building addition (Photograph 42), near the location of former Cleanout #2 (CO #2 on Figure 5). Another temporary pipe was installed at the southern end of the sewer pipe to act as a vent during filling (vertical pipe in foreground of Photograph 23). This work was performed by CHES.

Approximately 220 linear feet of 4-inch diameter clay sanitary sewer pipe was replaced from former Cleanout #3 (CO #3 on Figure 5), which is at the southeast corner of the building, to manhole SANI-1. Prior to replacement, this section of sanitary sewer pipe was videoed and then cleaned on September 14 and 16, 2015 by Roy's Plumbing with CHES' assistance. Cleaning of the sewer pipe was accomplished by feeding a cleaning nozzle through the pipe from manhole SANI-1 and flushing the fluid back to the manhole. Cleaning fluids were prevented from leaving the SANI-1 manhole by the use of a packer placed inside the manhole's effluent pipe. Cleaning fluids were collected by CHES at manhole SANI-1 with a trailer mounted vacuum tank. CHES personnel decontaminated all of the in-hole equipment that had the potential to be in contact with PCB containing sediments.

In conjunction with the cleaning effort, the line was traced to determine the exact location in relation to other site features prior to undertaking the burst procedure. Because of the limited information available regarding footing construction for the concrete ramp and the exact relationship of the structure to the sanitary sewer pipe passing under it, a test pit was excavated on the east side of the ramp. Removed soil was presumed to be a hazardous waste as no data existed in the area, and the removed soil was managed and disposed with other excavated soil. Soil excavation and material management was performed by CHES personnel. This test pit was filled as soon as possible with clean gravel, and the asphalt was patched during site restoration. In order to pull the new pipe through the old sewer line, an access pit was excavated near cleanout former Cleanout # 3 (CO #3 on Figure 5). This area (Photographs 21, 23 and 24) is near storm sewer manhole STMH-3. Excavation and material management for this access pit was conducted in the same manner as the test pit. The area was over excavated and clean gravel placed prior to entry into the trench by personnel from Roy's Plumbing.

On September 17, 2015, Roy's Plumbing used a bursting tool (Photograph 20) connected to preformed and heat bonded sections of HDPE pipe to replace the 220 foot section of 4-inch clay sewer pipe. Replacement was carried out by pulling the bursting tool and connected HDPE pipe through the existing clay pipe from CO #3 towards manhole SANI-1. As the bursting tool was pulled through the clay pipe, its cutting blade burst and expanded the clay pipe, allowing space for the replacement HDPE pipe to follow. A trench was dug at the CO #3 location to allow the replacement pipe to enter the existing sewer pipe (Photograph 21). On September 24, 2015, Roy's Plumbing connected the upstairs bathroom's effluent pipe to the replacement sewer pipe, via a connection to the new sewer pipe's cleanout near the southeast corner of the shop (Photograph 24). The plumbing work was inspected by the Town of Tonawanda on September 25, 2015 and no deficiencies were noted.

The new oil water separator on the south side of the shop had been inactive since the mid-1990s. This potential AOC was evaluated during the RFI and it was determined no corrective measures were necessary. However, over the years the unit has periodically needed to be emptied because precipitation continued to enter the unit. Therefore, GE elected to clean the unit and fill it in conjunction with the Corrective Measure work. The unit was emptied and rinsed and then filled with flowable fill on September 3, 2015 (Photograph 17). Additional material was needed to completely fill the manways and this material was placed on October 28, 2015.

6.3.5 Storm Sewers and Floor Drains

Approximately 920 linear feet (LF) of on-site storm sewers, along with associated catch basins, and manholes, approximately 70 LF of interior trench drains and floor drains, and approximately 1,300 LF of off-site storm sewers and manholes were cleaned during the 2015 CMI. Figure 6 shows the planned scope of work. Videoing of the on-site and off-site sewer lines was also conducted to the extent possible to confirm that the lines were adequately cleaned. Sewer cleaning and videoing was conducted by a team from Clean Harbors Field Services (CHFS) from September 30 through October 16, 2015.

Table 7 summarizes the lengths of the storm sewer line segments cleaned and videoed. Most of the storm sewer lines were cleaned for their entire length. Many were cleaned multiple times in order to remove sediment. Those sections that could not be completely cleaned or video inspected due to obstructions are listed on Table 7 and discussed below. Videoing of the lines was often only partially successful due to many obstructions encountered, particularly off-site. A photographic log of the storm sewer and floor drain work is provided in Appendix G.

6.3.5.1 On-Site Storm Sewers

The scope of the on-site storm sewer work included cleaning and video inspection of approximately 920 LF of sewer line and associated structures. The storm system structures that were cleaned included three manholes (STMH-1, STMH-2 and STMH-3), three catch basins (CB-1, CB-2 and CB-3) and the trench drain in the concrete ramp to the depressed loading dock. This effort included the storm sewer line north of manhole STMH-3 that conveys water from roof drains and passes through the soil removal area (Section 6.3.3). The northern-most roof drain line that extends under the shop building from column 1J to column 2J in the northeast area of the building was also cleaned.

Each of the manholes and catch basins were cleaned by vacuuming out sediment from the bottom of the structure and rinsing with water. Cleaning fluids were removed with a vacuum truck and subsequently transferred into a fractionalization tank (see wastewater management in Section 6.4). Cleaning of the storm sewer pipes was done using a jet-rod. A cleaning nozzle on the end of a stiff hose was advanced the full length of the pipe segment, then pulled back to bring all of the fluids back to the manhole. Cleaning fluids and sediment were collected from the manhole using a vacuum truck.

Cleaning of the underground portion of the roof drain line between columns 2J and 1J in the northeast part of the shop was accomplished by accessing the line at cleanouts near the columns. The line was cleaned by flushing with water. Video inspection of this line after cleaning was limited because of a P-trap and the presence of a 90 degree connection, which was at the other end of the line. As shown in Photograph 1 of storm sewer photographic record in Appendix G, the visually assessed portion of the line appeared to be in good condition with some scale and no sediment.

Cleaning of the southern stretch of the storm line east of the shop building was accomplished by accessing the line at storm manhole STMH-3 near the southeast building corner. The jet rodding head could not progress through the directional changes (two 45 degree sweeps and connecting pipe) that linked the north 1969 storm sewer with southern 1978 storm sewer. Therefore, the northern portion of the sewer was cleaned by flushing with clean water and southern portion was cleaned with the jet rodding head. The line was video inspected from the manhole into the new PVC pipe and appeared to be in generally good condition (see Photograph 3 in Appendix G). There was some scale and deposit buildup but no loose sediment or debris was observed in the video. The northern part of the line was first inspected with a push camera, but this video footage was of poor quality with intermittent clear images over the 90 feet videoed. The line was then re-inspected with a larger camera by disconnecting the PVC pipe so that the camera could be inserted into the line north of the 45-degree pipe sweeps. Only a short portion of this line could be videoed due to the presence of roofing stone in the line that prevented the larger camera from advancing further. As shown in Photograph 2 in Appendix G, the visible section of pipe appeared to be in good condition with no sediment. The images on the initial video that could be clearly seen showed clean stone in the pipe with no sediment in the line.

CHFS setup at manhole STMH-1 near the southwest corner of the building to access the storm sewer lines from the three on-site catch basins, which all tie into the manhole. CHFS was able to use the jet head to clean the full length of the pipes to the nearby catch basin CB-2 and to catch basin CB-1 in the lawn west of the building. Video inspection of the line to catch basin CB-2 showed that the line was in good shape and no sediment was present. Video inspection of the line to catch basin CB-1 could only be performed for a short distance (approximately four feet) because the joints between sections sewer line were misaligned. As shown in Photograph 5 of Appendix G, the section of pipe that was videoed had no sediment.

Cleaning and video inspection of the line segment from STMH-1 towards catch basin CB-3 in the middle of the paved area south of the shop building was hampered by an unknown obstruction in the line. Approximately 85 feet of the 118 foot section of the storm sewer pipe southeast of STMH-1 was cleaned before an unknown obstruction was encountered in the line. The obstruction prevented the jet head from progressing further up the line. Thus, approximately 30 feet of this line could not be cleaned. The video camera was unable to advance beyond 10 feet into the line due to the presence of hardened concrete in the line (see Photograph 4 of Appendix G).

The storm sewer lines from STMH-3 to STMH-2 and from STMH-2 to STMH-1 were cleaned and video inspected for the full length of the lines. The initial video inspection showed that some residual sediment was present between manholes STMH-2 and STMH-3. However, after being cleaned again, no sediment was observed in that pipe segment. Photographs 7 and 8 of Appendix G show the condition of the storm sewer line along the south side of the shop building. The pipe appeared to be in good shape with some scale and no sediment.

The cleaning and video inspection of the storm sewer line from on-site manhole STMH-1 towards Milens Road was hampered by changes in pipe direction. As shown on Figure 13, the line from manhole STMH-1 changes direction before connecting into the Town of Tonawanda line beneath Milens Road at a blind connection (no manhole or access point). CHFS was able to clean approximately 84 feet of line from STMH-1 southwest towards Milens Road before the jet head could not proceed further. Subsequent video of this section of line showed that the pipe directional change was in approximately the same location. The video showed that the pipe leading to the directional change was in good condition, but that some pipe joints have intruding concrete. Hardened deposits in the base of the pipe, possibly concrete, were also observed at some joints. As shown in Photograph 6 of Appendix G, the directional change for the pipe appears to be a custom created sweep comprised of multiple pipe sections (both straight and sweeped sections) to achieve the necessary connecting angle. As shown in the photograph, the joints are poorly aligned with intruding concrete. The camera was also unable to pass beyond the directional change. Thus, approximately 40 feet of line between the pipe directional change and blind connection to the Milens Road storm sewer could not be cleaned or videoed.

The trench drain at the base of the concrete ramp to the depressed dock was also cleaned. This structure is outside the shop building (Figure 13) and connects to the on-site storm sewer system. The grates were removed by GE personnel. CHFS personnel loosened bulk debris with a shovel and vacuumed up the debris. The structure was then washed with pressurized water and the cleaning fluids were captured by the vacuum truck.

6.3.5.2 Off-site Storm Sewers

Off-site storm sewer structures that were cleaned and videoed consisted of manholes MH-1 through MH-4 along Milens Road and the storm sewer pipes that connect them (see Figure 13). The entire length of all these sections were cleaned. The sewer pipe north of MH-1 towards GE was also cleaned for approximately 168 feet, which is beyond the estimated location of the western terminus of GE's on-site storm sewer system. In addition, the storm sewer pipe between MH-1 and a DKP catch basin near the southeast corner of GE's parking lot was also cleaned. Cleaning methods and the collection of sediment and cleaning fluids by vacuum truck followed the procedures and methods used for cleaning the on-site storm sewers.

Videos of the off-site storm sewer lines were limited in their success due to large debris and other obstructions encountered in the storm sewer pipes. The distances achieved during videoing and the types of obstructions encountered are summarized on Table 7.

The line extending east from the first off-site manhole (MH-1) towards the DKP catch basin near the southeast corner of the GE property (Figure 13) was cleaned and an attempt to video the line was made. It is believed that discharge from the DKP catch basin is a drop connection into this line. The distance of the pipe from the manhole to the catch basin (approximately 370 feet) and an additional 23 feet (total length of 393 feet) of this pipe was cleaned with the jet head. The cleaning fluids were captured by the vacuum truck. CHFS attempted to video this line after cleaning. The initial portion of the line appeared to be in good condition but standing water was obscuring view of the bottom of the pipe. Approximately 13 feet up the line, the camera hit an obstruction and was able to proceed after several attempts. Videoing proceeded up the line and another obstruction was encountered. After several attempts to advance further the camera made it past the obstruction and immediately sank below water level. After reversing the camera gray sediment (possibly gravel dust) could be seen bubbling up from below (Photograph 9 in Appendix G). The camera was unable to proceed further and the connection with the catch basin could not be confirmed with video. The locations of the obstructions are uncertain because the footage counter continued to add footage through many reversals and attempts to move beyond the obstructions.

CHFS attempted to video each segment of the sewer along Milens Road from both the upstream and downstream manholes. As shown in Photograph 10, large debris (concrete pipe pieces) was encountered in the pipe north of the first off-site manhole (MH-1) into which the GE storm sewers discharge at a blind connection. The presence of the debris prevented the video camera from advancing further up this pipe. The visible portion of the pipe appeared to be in good condition and no sediment was observed. A concrete obstruction limited the video footage of the downstream segment of line from MH-1. As shown in Photograph 11, some scale, staining, and solidified material was observed in the video from MH-2 north towards MH-1. The length of pipe that could be visually assessed appeared to be in good shape with no sediment. CHFS attempted to video south from MH-2 towards MH-3 but could not advance beyond the entrance to the pipe because of solidified concrete in the line. The video survey northward from MH-3 towards MH-2 was more successful with approximately 134 feet of the line videoed before concrete in the bottom of the pipe prevented further advancement of the camera. The length of pipe assessed via video appeared to be in generally good shape with a root intruding (see Photograph 12) and sediment was not observed. Video could not be obtained from the segment south of MH-3 toward MH-4 because concrete solidified within the pipe restricted camera movement. The video survey northward from MH-4 towards MH-3 was more successful with approximately 138 feet of pipe videoed before a large chunk of debris prevented further advancement of the camera. The pipe was largely dry and no sediment was observed.

6.3.5.3 Floor Drains

Other on-site structures that were to be cleaned as part of the work were floor drains inside the shop building. Included in this effort were:

- The rail bay trench drain in the northeast part of the shop that flows to a sump;
- The floor drain in the Depressed Dock along the south side of the building that flows to another sump; and
- A trench drain in the at-grade truck bay adjacent and west of the depressed loading dock.

The discharge from the rail bay trench drain has been replumbed numerous times over the years. Water from the rail bay drain is currently pumped as-needed from the sump by GE. Water from the Depressed Dock floor drain and the trench drain in the adjacent at-grade truck bay are believed to have historically connected to the new oil water separator and subsequently the sanitary sewer. Since that flow path was decommissioned years ago, the trench drain has had no discharge. Water that collects in the sump connected to the Depressed Dock floor drain is pumped into a drum and is subsequently disposed by GE.

Access to the trench drains for cleaning was accomplished by removing the trench drain covers to access the drains. Removal of the steel plates resulted in damage to both drain structures and the adjacent epoxy coated shop floor. Following trench cleaning activities, additional work was undertaken due to the damage. The at-grade truck bay trench drain was removed in its entirety and the area was restored to match the neighboring slab (see Section 6.7). Because the rail bay trench drain receives rain water run-in under the overhead doors and through the slots adjacent to the rails, GE decided to reconstruct this drain. The removal and reconstruction of the rail bay trench drain is discussed in Section 6.7.

Photographs 17 and 18 show work done at the at-grade truck bay. Removal of the grates damaged the metal frame and supporting concrete. The drain structure itself was intact and the former drain pipe was confirmed to have been filled with concrete in the past. The at-grade truck bay trench drain was cleaned by loosening bulk debris with a shovel before removing the sediment and debris with the vacuum truck. The trench was flushed with water and cleaning fluids were captured with the vacuum truck.

Photographs 19 and 20 show the Depressed Dock floor drain and associated sump. Both the drain and the sump were flushed with water and accumulated fluids were removed with the vacuum truck. The connecting pipe was also flushed with water.

Photographs 21 and 22 show the rail bay trench drain. Sediment in the trench was first removed using a shovel. Solid material was contained in plastic contractor bags and combined with excavated soil for disposal. The drain was flushed with water with the fluids collecting in the sump, and subsequently being captured by the vacuum truck.

6.3.6 Transportation Corridor

The Corrective Measure design included removing and replacing a minimum of one inch of the surface of a portion of the "L" shaped area on the south and east sides of the park area where PCBs were detected during the 2014 pre-design investigation. This area was milled over a period of several days in mid-November (Photograph 48 in Appendix C) to remove the top one inch of asphalt. The millings were collected and disposed with other non-hazardous project waste. The asphalt overlay, which was approximately 1.5 inches thick, was placed on November 23, 2015.

The scope of work in the Transportation Corridor was expanded to include repairing an area of pavement that experiences heavy truck traffic and which had deteriorated over the years due to inadequate pavement thickness and subsurface support for facility traffic patterns. The alligator cracking caused by subsurface movement, combined with the loading from turning trucks caused the asphalt overlay placed in 2004 to separate from the pavement below. An approximately 3,730 square foot area in the eastern part of the Transportation Corridor was excavated to minimum depth of 12 inches. The removed pavement and soil was transported to High Acres Landfill for disposal as a PCB-containing nonhazardous waste. The area was restored with at least 6 inches of clean gravel (2-inch crusher run) and 6 inches of asphalt. A number of smaller areas with deteriorated overlay were patched by placing new overlay. These areas are shown on Figure 12.

The removal work was performed by a team of CHES and select 40-hour HAZWOPER trained BB personnel. Removed soil and asphalt was managed and disposed as non-hazardous PCB waste based on prior sampling in the area. Pavement placement was performed by BB.

6.4 WASTEWATER MANAGEMENT AND TREATMENT

Liquid wastes were generated during CM actives that needed management. These wastes included: water removed from open excavations that were remediated but not yet backfilled; water removed from open excavations that was in contact with impacted soil; water generated by storm sewer cleaning activities; water generated by cleaning the sanitary sewer; and water removed from the old and new oil water separators. Due to the dry weather conditions during the field activities, very little excavation dewatering was needed. With the exception of the storm sewer cleaning work, CHES used a trailer mounted vacuum tank to collect wastewater and transfer it into a fractionalization tank. Wastewater generated from the storm sewer cleaning work was collected in a vacuum truck and transferred into a fractionalization tank for storage and settling.

As discussed in section 6.1.2.2, CHES obtained an Industrial Discharge Permit from the Town of Tonawanda for discharging projected generated wastewater. The permit required treatment as-needed by batch to achieve PCB concentrations below 0.065 micrograms per liter (µg/L). CHES treated and discharged three batches of water. For each batch, wastewater was pumped from the fractionalization tank through a portable water treatment system (described below) and into a ‘clean’ tank. A grab sample of the treated water was collected using disposable sampling equipment (bailer) and submitted for PCB analysis to Test America Laboratory in Amherst, New York. CHES was responsible for sampling and analysis, and AECOM assisted.

Table 8 summarizes the analytical results for the treated water. The analytical laboratory reports for the treated water samples are provided in Appendix H. As shown in Table 8, the second batch of water (represented by samples W002, W003, and W004) needed to be treated multiple times before the treated water met the discharge criteria.

After sampling documented a batch of water had met discharge criteria, CHES provided the Town of Tonawanda with a copy of the results. The treated water was discharged into sanitary manhole SANI-1 on the GE property (Figure 3) by gravity. The timing of discharge was coordinated with the town in accordance with the permit conditions so that discharge did not occur when non-project related compliance sampling was being performed nearby by others.

As summarized in Table 8, a total of three batches of water were treated, and approximately 30,079 gallons of water was discharged.

CHES used a trailer mounted portable treatment system with a maximum flow rate of 80 gallons per minute. The system used two parallel bag filters and two 4,000 pound activated carbon units for water treatment. Rain for Rent supplied CHES with three 21,000 gallon capacity fractionalization tanks for storing water and spill pads for the tanks and trailer. Rain for Rent also supplied two additional bag filter units plumbed in series that were added to the treatment train when the second batch of water failed to meet discharge criteria. A variety of bag filter sizes were used ranging from 25 microns down to one micron. Decommissioning of the water treatment system was a multistep process and is discussed in Sections 6.5 and 6.6.

6.5 DEMOBILIZATION ACTIVITIES

Demobilization activities took place throughout the project as different phases of remedial construction were completed. The majority of the demobilization activities took place from mid-November into December as the wastewater treatment system was disassembled and the removal of impacted material in the Transportation Corridor was completed.

CHES ended their full time on-site presence on November 24, 2015 and relied on subcontractors to complete the restoration. AECOM continued full time oversight through December 4, 2015, and subsequently made periodic visits to check the restoration progress and the rail bay trench drain rehabilitation during the winter of 2015-2016 (see Section 6.7.3).

The demobilization activities included decommissioning the wastewater treatment system, decontamination of equipment, select sampling of equipment, removal of equipment, left over supplies and materials, and support area facilities from the site. Removal of final waste is discussed in Section 6.6.

6.5.1 Equipment Decontamination

Equipment that had come in contact with PCB-impacted materials underwent decontamination activities before leaving the site. Equipment that was only used for ‘clean’ work, such as placing and compacting clean fill or asphalt placement, did not undergo decontamination. Equipment used for remedial tasks was first visually assessed to evaluate the extent of manual removal of materials that might be necessary. If necessary, manual removal of bulk residuals was performed, such as soil in excavator tracks being removed with a shovel. Removed materials were captured and managed with other PCB remediation waste by waste type (non-hazardous waste and hazardous waste). Next, the equipment underwent a wet wash using Citrisol cleaner/degreaser, and in some cases a pressure washer and sometimes a steam cleaner. Decontamination fluids were captured either within waste that was being shipped for off-site disposal (such as over a roll-off container), or on a temporary decontamination pad or similar equivalent setup (such as a bermed area with liner) that were subsequently combined with similar wastes for off-site disposal.

6.5.2 Wastewater Treatment System Decommissioning

The wastewater treatment system was decommissioned in steps to allow treatment of as much water as possible through the system. Prior to beginning decommissioning, several samples were collected to verify that the waste which would be generated during decommissioning the system would be nonhazardous waste. Sediments from the two fractionalization tanks that held untreated water were collected (TANK 1-SED and TANK 2-SED) and analyzed for PCBs to verify that the PCB concentrations were less than 50 mg/kg. In addition, a sample of untreated wastewater was collected (20151019 WASTEWATER) and analyzed to verify that pre-treatment water contained PCB concentrations less than 50 µg/L, to confirm that waste from decommissioning the system would not require incineration. The sampling effort was a joint effort between AECOM and CHES. The laboratory analytical reports for these samples are provided in Appendix I and the results are summarized in Table 9. As shown, the samples of sediment from each tank and the untreated wastewater all exhibited fairly low concentrations of PCBs, which confirmed that the waste that would be generated from decommissioning the plant could be appropriately classified as nonhazardous waste.

A group from Clean Harbors Field Services Division (CHFS) performed most of the decommissioning work. The sequence of consolidating materials, cleaning equipment, and wastewater treatment, which is described below, was performed in order to minimize the amount of waste generated from the decontamination and decommissioning activities.

During the week of October 26, 2015, the CHFS crew decontaminated the first fractionalization tank (tank #1, ID 254297), which had originally held untreated water, so that it could be used for treated water. Fractionalization tank #2 (ID 257395), which held untreated water, was emptied and the water was treated prior to being placed into tank #1. Cleaning of the second tank commenced after the tank was emptied. The water in fractionalization tank #3 (ID 251180), which had failed to meet discharge criteria (part of the second batch of water discussed in Section 6.4), was treated prior to being placed into tank #1. Tank #3 was cleaned after the water was removed.

Treated water was run through the wastewater treatment system in order flush the system and ensure that residual water within the units had all been treated prior to draining the system. Water and sediment in the vacuum trailer was removed prior to the trailer being cleaned. For each of the units a series of confined space entries were performed in order to remove the bulk solids, which were drummed; perform an initial steam cleaning; perform a second cleaning with an industrial strength cleaner (Purple Power); and then a final wipe down. Rainwater that had accumulated in the splash pads was collected and treated and two of the units were pressure washed. The liquid wastes were captured and either treated through the water treatment system or drummed. Solid wastes generated from the process, such as absorbent pads and personal protective equipment (PPE) were also drummed.

A CHFS crew returned to the site on November 21 and 22, 2015, to complete the decommissioning of the water treatment system. A vacuum truck was brought to the site to remove the carbon and organo-clay filter media from the two carbon vessels and this material was transferred into a CHES roll-off container along with other non-liquid, low PCB project related wastes. The carbon vessels and filter bag unit housings (or ‘pots’) were cleaned. Fractionalization tank #1 and the CHFS vacuum truck were cleaned. The remaining splash pads were also pressure washed. Liquid wastes from the cleaning were captured and drummed.

The two decommissioning events generated a total of 48 drums of waste. This included 37 drums of sludge, 1 drum of solid material such as PPE, and 10 drums of decontamination water. These drums were staged on-site pending removal for off-site disposal (Section 6.6).

6.5.3 Equipment Wipe Sampling

Wipe samples were collected from the three fractionalization tanks and bag filter housings (IDs 260380 and 260385) from Rain for Rent. Wipe samples were also collected from the vacuum truck (ID 4166) and water treatment system (ID CH1018) owned by Clean Harbors. The samples were submitted to Test America Laboratory in Amherst, New York for PCB analysis, and no PCBs were detected. The equipment wipe sampling results are summarized in Table 10 and the analytical reports are provided in Appendix J.

6.6 MATERIAL CHARACTERIAZATION, TRANSPORT, AND DISPOSAL

The project generated several types of solid waste streams that were managed based primarily on PCB content. These included:

- Wastes with low concentrations of PCBs; and
- Wastes with concentrations of PCB at or greater than 50 mg/kg, which makes it a New York State Hazardous waste.

The project also generated a limited amount of waste, such as cleared brush and trash that did not contain PCBs. Generic trash was bagged and added to the GE facility's dumpster. The majority of the cleared brush was chipped and subsequently spread over an unused portion of the GE property.

The CM Design called for materials to be disposed based on the as-found concentrations of PCBs. Areas of materials to be segregated for management and disposal as hazardous waste were shown on Drawings C-003A, B, and C in Appendix C of the *CMID Report*. The segregation of materials was based on historical soil data as well as the data gathered during pre-design investigations performed in 2014. Materials were segregated as planned during excavation activities (Section 6.3.3).

Other wastes generated through execution of the work, such as disposable personal protective equipment (PPE), plastic sheeting, etc., that were in contact with PCB impacted materials were managed and disposed based on the PCB content of the materials they were in contact with. For example, the PPE waste that accumulated in the personal decontamination area during the time period when hazardous soil waste was being generated was disposed along with those wastes. During the later stages of work when hazardous waste was not being generated, the PPE was managed and disposed in conjunction with the nonhazardous wastes.

GE contracted with Waste Management for transport and disposal of the remedial waste. Waste Management used Page E.T.C. of Weedsport, New York and Tonawanda Tank Transport of Buffalo, New York for transport of hazardous waste to CWM Chemical Services, LLC Landfill in Model City, New York, and Silverole Trucking of Rochester, New York for transport of nonhazardous waste to Waste Management of New York - High Acres Landfill in Fairport, New York. Waste Management also used Page E.T.C. for transportation of a couple of loads of nonhazardous waste. Clean Harbors Environmental Services transported and disposed some of the waste generated from decommissioning of the wastewater treatment system (Section 6.4) and used Frank's Vacuum Truck Service as a secondary transporter. 48 drums of waste from decommissioning the wastewater treatment system were disposed at the Spring Grove Resource Recovery Inc. facility in Cincinnati, Ohio.

6.6.1 Waste Profiles and Additional Waste Characterization Sampling

AECOM supported GE in establishing waste profiles for the removed materials. Additional samples were collected during the work to support waste management decisions. The samples were collected in general accordance with sampling protocols used for the 2014 pre-design investigation and were submitted to Test America Laboratory in Amherst, New York. The results of the additional waste characterization samples are summarized in Table 11, along with the analytical methods, and the analytical reports are provided in Appendix K.

Soil samples collected during the pre-design investigation were supplemented with four additional soil waste characterization samples collected during mobilization. Sample WC-PILE was intended to provide additional characterization data for soil that exhibited concentrations of PCBs at or greater than 50 mg/kg. This sample was collected from the soil pile that existed in the rail spur area prior to remediation. The other three samples were intended to provide additional characterization data for soil in areas with concentrations of PCBs less 50 mg/kg. Two surface soil samples were collected from along the eastern GE facility fence (north and south), and the other sample was collected from surface soil in area of the former rinse water tank excavation. The results of the additional waste characterization samples are summarized in Table 11 and the analytical reports are provided in Appendix K.

During the excavation in the former rinse water tank excavation area, field observations indicated that the area of gravelly fill extended further to the north than anticipated. Two grab samples of the fill material were collected to verify the PCB content of the material. As shown on Table 11, the two samples (RWT EXC 8.0’ and RWT EXC 10.5’) were found to have PCB concentrations less than 50 mg/kg. The excavated material was managed and disposed as non-hazardous waste.

During excavation work between the above ground storage tanks (ASTs) and the sewer lines along the east side of the shop building, a confirmatory soil sample (CS-70) exhibited high concentrations of PCBs. Prior to performing additional excavation in that area, a grab sample was collected adjacent to the original sample and submitted for Toxicity Characteristic Leaching Procedure (TCLP) to determine if the soil exhibited elevated concentrations of other constituents. As shown in Table 11, the soil contained several metals at low concentrations. When removed, this soil was managed and disposed as hazardous waste based on the as-found PCB concentrations.

As discussed in Section 6.3.5, the CMI work was expanded to include the removal of two interior trench drains. Grab samples of concrete were collected from each trench drain to evaluate management of the waste generated during the removal. Sample WC-CONCRETE SOUTH was collected from the trench drain in the at-grade truck bay west of the depressed dock and sample WC-CONCRETE NORTHEAST was collected from the trench drain in the rail bay in the northeast corner of the shop. As shown in Table 11, PCBs were found in both concrete samples as concentrations that allowed the removed material to be disposed as a non-hazardous waste.

In order to support the disposal of waste generated from decommissioning of the wastewater treatment plant, a sample of material in the roll off container was collected to verify the PCB content of waste. As shown in Table 11, the PCB content of WC-ROLLOFF was relatively low, and the material was disposed as non-hazardous waste.

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6.6.2 Material Transport and Disposal

The higher level PCB wastes were disposed of at the CWM Chemical Services, LLC Landfill in Model City, New York. These materials included:

- Some of the removed soil (soil piles, select sewer bedding materials, select former rinse water tank excavation fill;
- Some of the removed asphalt;
- Some of the removed concrete;
- The old oil water separator;
- Some of the removed railroad ballast material; and
- Several roll off containers of waste generated during the later stages of excavation when accumulation of hazardous waste was slower.

Table 12 is a summary of the hazardous waste shipments. Copies of the manifests documenting the transportation and disposal of the hazardous waste shipments are provided in Appendix L. In total, approximately 2,075 tons of hazardous waste was transported and disposed during the project.

The lower level PCB wastes were disposed of at the High Acres Landfill in Fairport, New York. These materials included:

- Some of the removed soil;
- Some of the removed asphalt;
- Some of the removed railroad ballast material; and
- The roll off containers of waste generated from the later stages of work, such as the asphalt millings and wastewater plant decommissioning waste and trench drain removal.

The majority of the waste was loaded by CHES into lined dump trucks owned by Silverole Trucking for transport to High Acres Landfill. During the later stages of the project, lined roll-off containers were used to store material on-site as it was generated, and for transport to the landfill. Decommissioning of the wastewater treatment plant (Section 6.4) resulted in the generation of 48 drums of nonhazardous sludge, decontamination water, and solids (such as PPE). The drums were transported by Clean Harbors and Frank’s Vacuum Service for disposal at Spring Grove Resource Recovery, Inc. in Cincinnati, Ohio.

Table 13 is a summary of the nonhazardous waste shipments. Copies of the manifests and bills of lading for the non-hazardous shipments are provided in Appendix M. In total, an estimated 3,763 tons of low level PCB waste (nonhazardous) was transported and disposed during the project.

6.7 RESTORATION

Restoration activities included backfilling excavated areas with clean fill suitable to support restored surfaces and restoration of site surfaces and structures. Photographs of restoration activities are provided in the site work photographic log in Appendix C. Surfaces and other items disturbed during the work were replaced with treatments similar to and of equal or better quality than those that were present before the work began, including:

- Concrete slabs near the rail bay doors;
- A concrete slab west and south of the ASTs, which replaced the pre-existing sod;

- A concrete slab between the two sets of rails, which replaced an asphalt covering;
- A concrete floor slab, which replaced the decommissioned trench drain at the truck bay;
- A reconstructed trench drain at the rail bay doors;
- The asphalt access road on the east side of the building;
- Asphalt pavement near the rail spur (north and south of the railroad tracks);
- The gravel access road to the Lamar property;
- Perimeter fencing between GE and DKP properties;
- The 8-inch storm sewer along the eastern perimeter of the building; and
- Re-vegetation of vegetated surfaces disturbed during the work.

In accordance with the plans presented in the *CMID Report*, the soil piles near the rail spur were not replaced. Post-remediation conditions for the rail spur area, the area east of the shop, and the Transportation Corridor and adjacent areas are shown in Figures 10 through 12.

CHES performed most of the backfill and grading work. The concrete and asphalt restoration work was subcontracted to Buffalo Blacktop & More (BB). SJB Services, Inc. (SJB) of Hamburg, New York, performed construction material testing, which included compaction testing and concrete testing. Fox Fence performed the replacement fence installation, and Westwood Landscaping Inc. of Kenmore, New York performed the seeding. CHES contracted with Nussbaumer & Clarke, Inc. (NCI) to provide survey services. CHES was required to have a surveyor collect data for: the horizontal and vertical extent of excavation; structures such as the new storm sewer line; and confirmatory soil sampling points prior to backfilling an area. Areas were not backfilled until the analytical results for confirmatory soil samples had been received and reviewed, as discussed in Section 6.3.2. In general, backfilling progressed from north to south.

6.7.1 Backfill

This section describes the evaluation criteria for clean fill, the use of demarcation fabric, and general backfill and grading procedures.

6.7.1.1 Clean Fill

CHES provided clean fill documentation in general accordance with the requirements of DER-10. CHES identified Pariso Logistics of Tonawanda, New York as a potential supplier of the various fill materials that would be needed (common fill, type II subbase, topsoil, and ballast stone). The Lafarge Lockport Plant was the proposed source of the materials, and Lafarge provided a letter (Appendix N) documenting that this was a virgin source. Data from mechanical analyses of the materials (i.e., gradation testing) was also provided to AECOM to verify the proposed materials met specifications. CHES submitted grab samples of the common fill (also known as 1” minus screened sand/clay), Type II subbase (also known as 2” c/run stone), and topsoil to Test America in Amherst, New York for analysis of the parameters required by DER-10 Section 5.4(e). Chemical analysis of the proposed ballast stone (also known as item #57 stone) was not required under DER-10 because of the lack of fines within this material. The analytical results are provided in Appendix N and summarized in Table 14. As shown in Table 14, the results were compared to the requirements of Section 5.4(e) of DER-10 for Commercial or Industrial Use and were found to meet the criteria.

The Type II subbase was the primary material used to construct the temporary access road on the DKP property. Some larger stone was used to repair soft areas of the road later in the project. In addition to the materials planned to be used during restoration, several other types of stone with minimal fines were used for drainage north of the tracks and for pipe bedding material when backfilling along the replacement sewer line east of the shop building. Because these materials were from a virgin source, additional analytical testing was not performed.

6.7.1.2 Demarcation Fabric

PCBs remained at concentrations greater than 1 mg/kg in soils supporting site structures in three areas of the site (see Section 6.8). The confirmatory soil sampling locations for these areas are shown on Figures 11 and 12. In accordance with project design, orange demarcation fabric was placed over the un-excavated soil before these areas was backfilled. The approximate locations of the demarcation fabric for the three areas are shown in Figure 15. Photographs 34, 40, and 41 in Appendix C show the fabric being installed.

6.7.1.3 Backfill and Grading

CHES performed most of the backfill, compaction, and grading work and BB assisted. Photographs 33, 34, 36, 37 and 38 in Appendix C show backfilling activities. In general, the areas that were to be restored with topsoil and vegetation were backfilled to within six inches of final grade with common fill and then finished with a six-inch layer of topsoil. Areas within the railroad ties were backfilled with ballast stone. Type II subbase was used to backfill other areas, such as those areas that would be completed with asphalt or concrete surfaces and the stone access road to the Lamar property. SJB performed compaction testing of fill placed in areas that would support traffic, such as under the concrete and asphalt in the rail spur area and under the access road up the east side of the shop.

6.7.2 Replace Storm Drain

The section of storm drain east of the shop building that was removed during soil excavation (Section 6.3.3) was permanently replaced during restoration activities. The 8-inch diameter storm sewer pipe and smaller roof drain lateral connections were replaced with SDR35 PVC Sewer Pipe. Figure 13 shows the configuration of both the removed and replaced storm sewer. The new storm sewer pipe was approximately 140 feet long, and the location of the ‘jog’ (a 45 degree paired sweep to align the original 1969 construction with the 1978 construction) was moved approximately 70 feet to north from the former location near building column line “C”. Photograph 36 in Appendix C shows the location of the relocated pipe jog and Photograph 37 shows two of the three roof drain laterals within the remedial area. The third roof drain lateral is near the cleanout shown in Photograph 42 and was not removed and replaced. The plumbing work was inspected by the Town of Tonawanda on October 9, 2015, and no deficiencies were noted. A layer of 1-inch stone was used as pipe bedding material during backfilling work near the new pipe.

6.7.3 Concrete

The preexisting concrete slabs in front of the rail bay doors and near the former RCRA container storage area in the rail spur area were replaced during the work. In addition, concrete slabs were used instead of asphalt pavement between the sets of tracks, and instead of lawn in the vicinity of the ASTs. Concrete was also placed inside the shop to reconstruct the floor slab in the at-grade truck bay west of the Depressed Dock where the trench drain was removed (Section 6.3.5) and in the northeast part of the building where the rail bay trench drain was removed and reconstructed. Preparation and placement of concrete was performed by BB.

6.7.3.1 Outdoor Concrete Slabs

The slab reconstruction at the rail bay doors and adjacent to the storage area was intended to be heavy-duty to support heavy traffic. The slab was 8-inches thick, except over the railroad ties, was reinforced with 4-inch wire mesh, and the concrete was a 5,000 pounds per square inch (psi) mix. The concrete was placed in two pours. SJB was present for the initial pour and provided testing services (air entrainment, slump, and cylinders for compression testing). SJB was not present for the second pour, but a set of test cylinders were made by AECOM and subsequently tested. Compression testing by SJB indicated the concrete met or exceeded the 5,000 psi criteria. The heavy-duty slab near the former RCRA storage area is visible in the background of Photograph 43 in Appendix C and the concrete slabs in the rail spur area are shown on Figure 10.

Lighter duty concrete was placed adjacent to the ASTs (Photograph 43), and is shown on Figure 11. A four-inch thick slab of 4,000 psi concrete with 4-inch wire mesh reinforcement was used to restore this area. No testing of this concrete was performed. An approximately 4-inch thick slab with four-inch wire mesh reinforcement was also placed in the area between the two sets of railroad tracks (Figure 10).

6.7.3.2 At-Grade Truck Bay

A trench drain inside the shop building at the truck bay door west of the Depressed Dock was decommissioned rather than being cleaned and left in service as was originally planned (Section 6.3.5). A temporary containment area was constructed to isolate the area from the main shop floor prior to concrete removal. BB personnel with 40-hour HAZWOPER training performed the concrete removal and reconstruction work. ACEOM provided oversight of the work and collected a sample of the concrete for PCB analysis (WC – CONCRETE SOUTH) to verify the as-found PCB concentrations. These analytical results are summarized in Table 11 and provided in Appendix K. The concrete shop slab was cut with a concrete saw while water was being applied, as needed, to limit dust generation. The concrete was broken up into smaller pieces with a hydraulic hammer. Removed material was transported in a lined dump truck to the southeast part of the GE property and stored in a lined and covered area pending transport and disposal as a PCB-containing nonhazardous waste. As shown in Photograph 45 of Appendix C, an area approximately 16 feet 1-inch long, 5 feet wide, and up to 12-inches thick was removed. The area was restored by installing steel reinforcement doweled into the surrounding concrete and placement of 5,000 psi early strength concrete (Photograph 46 in Appendix C). Concrete cylinders for compression testing were made by BB at the request of AECOM. Subsequent testing by SJB verified that full strength was achieved. Ultimately a grey epoxy coating was applied. Figure 14 shows the at-grade repair area.

6.7.3.3 Rail Bay Drain

The trench drain inside the shop building at the rail bay doors in the northeast part of the shop building was removed and reconstructed, rather than cleaned and left in service as originally planned (Section 6.3.5). A temporary containment area was constructed to isolate the area from the main shop floor prior to concrete removal. BB personnel with 40-hour HAZWOPER training performed the concrete removal and most of the reconstruction work. ACEOM provided periodic oversight of the work and collected a sample of the concrete for PCB analysis (WC – CONCRETE NORTHEAST) to verify the as-found PCB concentrations of the material that was removed. These analytical results are summarized in Table 11 and provided in Appendix K. The concrete shop slab was cut with a concrete saw while water was being applied, as needed, to limit dust generation. The concrete was broken up into smaller pieces with a hydraulic hammer. Removed material was placed into a lined roll-off container pending transport and disposal as a PCB-containing nonhazardous waste. The concrete removal area was approximately 18-inches deep, 5 feet wide, and 47 feet long. The rail bay trench drain repair area is shown in Figure 14 and Photographs 51 and 52 (Appendix C).

The plan was to restore the area through two or three concrete pours to provide a solid base, tie the new concrete into the surrounding slab, and form a new trench drain. A new metal angle iron frame to support the trench drain covers was also planned. A 5,000 psi early strength concrete was to be used to limit the time period the shop was without use of the area. The initial concrete pour for the base of the trench was of questionable strength and structural integrity. Further reconstruction of the drain area was delayed as quality of work and measures to counteract the areas of weak concrete were discussed. A plan forward that included placement of additional reinforcement was agreed upon between GE,CHES, and BB, and the main concrete placement occurred on February 25, 2016. Concrete cylinders for compression testing were made by BB at the request of AECOM. Subsequent testing by SJB verified that full strength was achieved.

BB demobilized from the site following the main concrete placement. CHES returned to the site to remove formwork and provide general cleanup. As the forms were removed it became apparent that the formwork had prevented the concrete from fully supporting the metal angle iron that would support the steel trench cover plates. AECOM expressed concern that the incomplete support of the angle iron may be an issue under heavy load conditions, and this matter continues to be reviewed and discussed. The metal cover plates have been installed by GE shop personnel, and the shop is using the area until a final decision is made regarding additional concrete placement. Additional work to reconstruct the trench drain may occur after submission of this *CMCR*, but this restoration work will not be part of the Corrective Measures.

6.7.4 Asphalt Surfaces

The asphalt surfaces removed and replaced during the CMI included asphalt in the vicinity of the railroad tracks and the entire length of the access road along the east side of the building. At the request of GE, the asphalt in the rail spur area was extended approximately 10 feet north of the pre-project location when the site was restored. Figure 10 shows the locations where asphalt was placed during restoration in the rail spur area. Photographs 43 and 47 of Appendix C show asphalt being placed in the rails spur area. The replacement asphalt for the rail spur area and the access road was heavy duty pavement with two 3-inch layers of asphalt placed, except for between the rails where the ties limited pavement thickness. All of the asphalt replacement was performed by BB.

Asphalt was also placed as part of the work in the Transportation Corridor as discussed in Section 6.3.6. The access pit and test pit areas excavated for the sanitary sewer burst lining work (Section 6.3.4) were restored in the same manner as the large repair area shown on Figure 12.

6.7.5 Perimeter Site Fence

Following completion of the restoration activities, the temporary project fence was removed and a new site fence installed (Photograph 49 in Appendix C). The new fence was placed at the pre-CMI locations with one exception; at the northeast portion of the property, the fence was moved 40 feet further east at the request of GE.

6.7.6 Vegetation

Previously vegetated areas were restored by hydroseeding. A seed blend of Kentucky blue, rye, and creeping red fescue mixed with a seed aide product of penn mulch was placed on December 11, 2015. During a site visit on May 11, 2016, germination appeared to be uneven with some areas exhibiting good growth and other areas bare. Additional seeding occurred on May 17, 2016. Additional work to establish vegetative cover may be performed after the submission of this *CMCR*, but this work is not directly related to CMI completion.

6.7.7 As-Built Drawings

An as-built drawing prepared and stamped by NCI is provided in Appendix O. AECOM noted several data gaps while reviewing the NCI drawing. These gaps included undocumented additional excavation and missing confirmatory sampling points. Field generated data gathered by AECOM during oversight was used to supplement the NCI drawing and create the AECOM as-built, which is provided as Appendix P. The field generated data that was reviewed and supports the more detailed as-built included: field notes, field sketches, and photographs.

6.8 SUMMARY OF REMAINING CONDITIONS

Table 6 and Figures 10 through 12 summarize the post-remediation soil quality at and near the GE Tonawanda shop. The cleanup objective of 1 mg/kg PCBs for both surface and subsurface soil on properties owned by others was achieved for the Lamar property and NYSDOT property to the north, and the DKP property to the east and south of the GE property.

On the GE property, surface and subsurface soil was remediated to achieve 1 mg/kg or less PCBs in soil, except for three areas where additional soil could not be removed without impacting an overlying site structure. These three areas were:

- **Soil Near Southwest corner of the ASTs:** confirmatory soil sample CS-103 (SIDEWALL 5.0') contained 1.2 mg/kg PCBs. Additional soil could not be removed due to the proximity of the ASTs.

- **Soil Along East Edge of Transportation Corridor:** confirmatory soil samples CS-3 (SIDEWALL 0.5') and CS-6 (SIDEWALL 0.5') contained 3.0 and 12.5 mg/kg PCBs, respectively. These samples were collected from the sidewall of the excavation at the edge of the pavement. Additional soil could not be removed without removing pavement.

- **Along South Edge of Transportation Corridor:** confirmatory soil sample CS-146 (SIDEWALL 0.5') contained 2.9 mg/kg PCBs. This sample was collected from the sidewall of the excavation at the edge of the pavement. Additional soil could not be removed without removing the pavement.

In each area where soil with greater than 1 mg/kg PCBs was left in place supporting a site structure, orange geotextile fabric was placed prior to backfilling the excavation to demarcate the residual impacted material.

An estimated 33 foot length of the storm sewers near CB-3 on the GE property could not be cleaned due to an obstruction in the line. Video of the area could not be obtained due irregularities in pipe construction.

In addition to the residual impacted PCB soils remaining after the 2015 Corrective Measure work that are summarized above, PCB impacted concrete and asphalt remain in use at the site in accordance with the selected remedy and design. As discussed in Section 3.2, these areas include:

- **Concrete Floor Slab (Depressed Dock and Truck Bay AOCs):** the depressed dock and truck bay along with most of the concrete shop floor slab with PCBs greater than 1 mg/kg or 10 µ/100 cm^2, the limits of which are depicted in Figure 14.

- **Asphalt of Transportation Corridor:** an irregularly shaped area of asphalt with PCBs greater than 1 mg/kg comprising most of the paved area south of the shop, the limits of which are depicted in Figure 15.

7.0 DEVIATIONS FROM PROJET PLANS

The Corrective Measure Implementation was performed in general accordance with the NYSDEC-approved *CMIP* and *CMID Report*, and attachments. There were four notable deviations from the project plans, and they are:

- GE was able to attain a subsurface cleanup level of 1 mg/kg PCB throughout the work rather than the planned 10 mg/kg PCB level proposed for subsurface soil, except for three areas under site structures.

- There is survey data missing from the project record for unknown reasons, or combination of reasons. The gaps in survey data have been filled using AECOM's field records of the work. An as-built drawing prepared and stamped by the licensed surveyor is provided in Appendix O. An as-built drawing was prepared by AECOM based upon survey data and our field data. This record drawing has been stamped by a New York Licensed Professional Engineer and is presented in Appendix P.

- The project plans called for video inspection of the cleaned storm sewer to verify the work was complete. Due to construction abnormalities in both the on and off site storm sewer systems, the video inspection could not be completed. AECOM personnel were present during the cleaning efforts and visually assessed the rinse water from each leg. Based on the partial footage that was obtained and visual assessment of the rinse water from each sewer leg, we believe that sediment has been removed from the storm sewers as planned, except as noted below.

- A section of the storm sewer between on-site catch basin CB-3 and storm sewer manhole STMH-1, could not be cleaned due to an obstruction in the line. This section begins approximately 85 feet up the line towards CB-3 from STMH-1 and is approximately 33 feet in length. As the line could not be video inspected due to the irregularities in pipe construction, the cause of the obstruction is not known.

AECOM does not believe that any of the deviations described above present a significant change from the proposed scope of work.

8.0 CONCLUSIONS

GE has successfully completed the Corrective Measures for the site that were described in the *Statement of Basis* and the July 2012 *373 Permit* for all accessible Areas of Concern. The Corrective Measures were completed as outlined in the *Corrective Measure Implementation Plan* and in general accordance with the *Corrective Measure Implementation Design Report*. The Corrective Measure Implementation activities undertaken during 2015 have accomplished:

- Accessible soils at the GE property have been remediated to achieve a cleanup objective of 1 mg/kg PCBs in all areas. Residual impacted material remains at the site in limited areas where site structures (ASTs and pavement) limit accessibility to the soils.

- The NYSDOT property north of both the GE property and the Lamar property has been fully remediated. Confirmatory soil samples from the sidewalls and base of the excavation document that the 1 mg/kg PCB cleanup objective has been achieved. The NYSDOT property may be used without restriction.

- The Lamar property north of the GE property has been fully remediated. Confirmatory soil samples from the sidewalls and base of the excavation document that the 1 mg/kg PCB cleanup objective has been achieved. The Lamar property may be used without restriction.

- The DKP property south and east of the GE property has been fully remediated. Confirmatory soil samples from the sidewalls and base of the excavation document that the 1 mg/kg PCB cleanup objective has been achieved. The DKP property and may be used without restriction.

- Sediments have been removed from the GE storm sewers (including three trench drains, one floor drain, two sumps, three catch basins, and three on-site manholes) to the extent practicable.

- Sediments have been removed from the DKP catch basin and the storm sewer line that ties into manhole MH-1 on Milens Road.

- Sediments have been removed from the Town of Tonawanda storm sewer along Milens Road from the discharge from the GE shop south to manhole MH-4.

- A section of storm sewer line east of the GE shop building that was removed to perform soil excavation was replaced.

- The old oil water separator has been removed and soil excavation reached apparent undisturbed native clay.

- The former sanitary sewer line from the old oil water separator to the building bump out at the southeast shop corner has been removed.

- The sanitary sewer line from the building bump out at the southeast corner of the shop to the on-site sanitary sewer manhole (SANI-1) has been burst lined. New plumbing has been installed to tie the restroom in the southeast corner of the building to the burst-lined sewer.

- The section of former sanitary sewer line under the building bump out at the southeast corner of the shop has been permanently removed from service by filling in place with flowable fill.

- The previously unaddressed section of the Transportation Corridor (the asphalt “L”) has been milled and new pavement placed.

- An area of deteriorated pavement in the Transportation Corridor was removed and replaced.

- The new oil water separator has been permanently removed from service by cleaning the unit and filling it with flowable fill.

- One trench drain at the at grade truck bay west of the depressed dock was removed, and the building floor slab reconstructed.

- The rail bay trench drain and adjacent floor slab in the northeast part of the shop was removed and reconstructed.

- Wastewater generated from sewer cleaning, decontamination, and excavation dewatering activities was captured, treated to meet Town of Tonawanda discharge permit conditions, and discharged to the town sanitary sewer system in accordance with the terms of the discharge permit.

- PCB impacted soil, sediment, and debris was segregated based on as-found concentrations and was transported and disposed at appropriately licensed facilities.

- A total of 2,075 tons of soil and debris with assumed or as-found concentrations of PCBs to characterize it as a hazardous waste was removed from the site and disposed of at an appropriately licensed off-site facility.

- A total of 3,763 tons of soil, debris, sediment, and decontamination liquids with PCB concentrations less than 50 mg/kg (or 50 µg/L) was removed from the site and disposed of at appropriately licensed off-site facilities.

Clean fill was been used to restore excavated areas. New asphalt, concrete, gravel, and topsoil with hydroseed were placed in the fall of 2015. Additional effort to establish vegetative cover may be necessary in the spring and early summer of 2016.

Residual impacted materials at the site include the concrete shop floor slab (the Truck Bay and Depressed Dock AOCs), the majority of the paved area south of the GE shop building (Transportation Corridor), and three areas of subsurface soil that supports site structures. A site management program to prevent inadvertent disruption of these areas will be implemented. The site management program will include a requirement to evaluate the quality of soil beneath site structures in the future when the subsurface soil becomes accessible. A deed restriction will be placed on the property to limit the use of the property to industrial or commercial use and ensure that potential future owners of the property are aware of environmental restrictions on the property and the need to comply with the site management program.

The remedial work performed in 2015 in conjunction with the previously completed Interim Corrective Measures has addressed PCB impacts at and near the GE site to meet or exceed the cleanup objectives.

9.0 SITE MANAGEMENT PROGRAM

A site management program will be implemented at the site. The primary purpose of the program will be to provide procedures for protection and maintenance of the engineering controls that are part of the site remedy, memorialize areas of residual impacts or potential residual impacts at inaccessible areas, and document standard procedures for maintenance and monitoring of the site and for potential subsurface activities.

In accordance with the requirements of the July 2012 *373 Permit*, a Site Management Plan and a Groundwater Monitoring Plan will be prepared and submitted to NYSDEC. The site management program will include a requirement to evaluate the quality of soil beneath site structures in the future when the subsurface soil becomes accessible. A deed restriction will be placed on the property to limit the use of the property to industrial or commercial use and ensure that potential future owners of the property are aware of environmental restrictions on the property and need to comply with the site management program. These plans are being developed concurrent with this *CMCFR* and will be submitted to NYSDEC under separate cover.

9.1 DESCRTIPTION OF ENGINEERING CONTROLS AND RESIDUAL IMPACTS

The post-remediation engineering controls described in the selected remedy included: securing the site with a fence; covering impacted soil with at least one foot of clean soil cover or other barrier, such as concrete or asphalt; covering impacted asphalt with a clean layer of pavement; and covering impacted concrete with two layers of epoxy coating or other barrier, such as equipment.

The Corrective Measures described in this report document that other than three locations where site structures (AST containment structure and asphalt pavement) prevented additional soil removal, the site was remediated to achieve less than 1 mg/kg PCBs, thus alleviating the need for long term soil management in most areas.

Areas of residual impacts at the site are shown on Figure 14, and include:

- **Exterior Soil Near Southwest corner of the ASTs:** a geotextile fabric and 12 or more inches of soil and concrete over soil containing PCBs greater than 1 mg/kg that is supporting the AST structure.

- **Exterior Soil Along East Edge of Transportation Corridor:** geotextile fabric demarcates soil remaining under the pavement with PCBs greater than 1 mg/kg from clean fill placed in remediated areas to the east along an approximately 55 foot long stretch near confirmatory sample locations CS-3 and CS-6.

- **Exterior Soil Along South Edge of Transportation Corridor:** geotextile fabric demarcates soil remaining under the pavement with PCBs greater than 1 mg/kg from clean fill placed in remediated areas to the south along a 17 foot long stretch near confirmatory sample location CS-146.

- **Interior Concrete Floor Slab (Depressed Dock and Truck Bay AOCs):** the depressed dock and truck bay along with most of the concrete shop floor slab with PCBs greater than 1 mg/kg or 10 µg/100 cm^2, the limits of which are depicted in Figure 14.

- **Exterior Asphalt of Transportation Corridor:** an irregularly shaped area of asphalt with PCBs greater than 1 mg/kg comprising most of the paved area south of the shop, the limits of which are depicted in Figure 15.

Engineering controls to address residual impacts at the site are also shown on Figure 15. The engineering controls include perimeter fencing and cover systems that have been completed and need to be maintained. The cover systems include:

- AST containment structure and adjacent soil and concrete;
- Asphalt of the Transportation Corridor;
- Asphalt cover on the Transportation Corridor; and
- Epoxy coating on the Depressed Dock and Truck Bay (shop floor).

Each of these controls was in place as of December 4, 2015, when CM construction was substantially complete.

9.2 SITE MANAGEMENT PLAN

A Site Management Plan (SMP) has been prepared for the site and will be submitted under separate cover. The objective of the SMP is to ensure continued containment of residual impacts in concrete, asphalt, and subsurface soil, and to establish procedures for management of residual impacted materials. The SMP includes descriptions and drawings of areas of the site with residual impacts, procedures for routine inspections and reporting, and procedures for repairs, maintenance, and potential future construction activities.

9.3 GROUNDWATER MONITORING PLAN

A Groundwater Monitoring Plan has been prepared as required by the Part 373 Permit and will be submitted under separate cover. The groundwater monitoring program proposed in the NYSDEC-approved *CMIP* included the installation of two new deep groundwater monitoring wells on the west (down-gradient) side of the site and installation of replacement well MW-5. Annual groundwater monitoring of the three wells for PCBs and VOCs will take place for five years. The purpose of the groundwater monitoring program is to verify that groundwater underlying the site continues to be un-impacted by historical site activities.

9.4 ADDITIONAL LONG-TERM REQUIREMENTS

Additional long-term requirements were incorporated into the *CMIP* and into the July 2012 *Part 373 Permit*. These requirements include an environmental easement on the property that:

- Restricts the facility to commercial use;

- Requires the facility owner to submit a schedule for the RCRA Facility Investigation work plan that includes a Report on Current Conditions for the inaccessible Sub-slab Area of Concern (AOC) no later than 90 calendar days following the date when the AOC becomes accessible for such an investigation; and

- Requires compliance with an approved Site Management Plan.

The Part 373 Permit that was issued July 5, 2012 includes requirements for additional investigation and subsequent activities, as warranted, should additional areas of concern be identified or at such time as the facility building is planned for demolition.

10.0 REFERENCES

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TABLES

TABLE 1
CLEANUP OBJECTIVES FOR COMPOUNDS DETECTED IN SOIL, SEDIMENT AND GROUNDWATER
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Compound	**Cleanup Objective for Soil and Sediment[1] (mg/kg)**	**Cleanup Objective for Groundwater[2] (µg/L)**
PCBs	**Surface Soil and Sediment / Subsurface Soil**	
Aroclor 1248	1/10	0.09
Aroclor 1254	1/10	0.09
Aroclor 1260	1/10	0.09
Total PCBs (Lab)	1/10	0.1
VOCs	**Subsurface Soil**	
Benzene	0.06	1
Chlorobenzene	1.7	5
Chloroform	0.3	7
1,2-Dichlorobenzene	7.9	3
1,3-Dichlorobenzene	1.6	3
1,4-Dichlorobenzene	8.5	3
1,1-Dichloroethane	0.2	5
1,1-Dichloroethene	0.4	5
cis-1,2-Dichloroethene[3]	0.3	5
Ethylbenzene	5.5	5
Methylene chloride	0.1	5
Toluene	1.5	5
1,1,1-Trichloroethane	0.8	5
m-, p-Xylenes[4]	1.2	5
o-Xylene[4]	1.2	5
Total VOCs	10	NS

Notes:
1. Recommended Soil Cleanup Objectives (RSCOs) from New York State Department of Environmental Conservation (NYSDEC) Technical and Administrative Guidance Memorandum (TAGM) HWR-94-4046.
2. NYS Groundwater Standard (6 NYCRR Part 700), Division of Water Technical and Operational Guidance Series (TOGS), June 1998.
3. Soil standard for trans-1,2-Dichloroethene.
4. Standard for total xylenes.

NS = No Standard

TABLE 2
SUMMARY OF SAMPLES
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID	Sample Date	Property	Sample Type	Sampled By	Final Results Received	Laboratory Job Number
WC-N. FENCE	8/5/2015	GE	Waste Characterization	AECOM	8/11/2015	480-85099-1
WC-PILE	8/5/2015	GE	Waste Characterization	AECOM	8/11/2015	480-85099-1
WC-RWTP-SURFACE	8/5/2015	GE	Waste Characterization	AECOM	8/11/2015	480-85099-1
WC-S. FENCE	8/5/2015	GE	Waste Characterization	AECOM	8/11/2015	480-85099-1
CS-1 (SIDEWALL 0.5)	8/20/2015	DKP	Sidewall	AECOM	8/21/2015	480-85924-1
CS-2 (BOTTOM 1.0)	8/20/2015	DKP	Base of excavation	AECOM	8/21/2015	480-85924-1
CS-3 (SIDEWALL 0.5')	8/20/2015	GE	Sidewall, edge of pavement	AECOM	8/21/2015	480-85924-1
CS-4 (SIDEWALL 0.5')	8/21/2015	DKP	Sidewall	AECOM	8/26/2015	480-86064-1
CS-5 (BOTTOM 1.0')	8/21/2015	DKP	Base of excavation	AECOM	8/26/2015	480-86064-1
CS-6 (SIDEWALL 0.5')	8/21/2015	GE	Sidewall, edge of pavement	AECOM	8/26/2015	480-86063-1
20150901-FD-1	9/1/2015	Lamar	Field Duplicate (CS-19)	AECOM	9/4/2015	480-86457-1
20150901-RB-1	9/1/2015	GE	Rinse Blank	AECOM	9/4/2015	480-86459-1
CS-10 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-11 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-12 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-13 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-14 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-15 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-16 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-17 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-18 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-19 (BOTTOM 1.0')	9/1/2015	Lamar	Base of excavation	AECOM	9/4/2015	480-86457-1
CS-20 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-20 (BOTTOM 1.0')MS	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-20 (BOTTOM 1.0')MSD	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-21 (SIDEWALL 0.5')	9/1/2015	Lamar	Sidewall	AECOM	9/4/2015	480-86457-1
CS-22 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-23 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	AECOM	9/4/2015	480-86459-1
CS-24 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-25 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-26 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	AECOM	9/4/2015	480-86459-1
CS-27 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-28 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	AECOM	9/4/2015	480-86459-1
CS-29 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	AECOM	9/4/2015	480-86459-1
CS-30 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	AECOM	9/4/2015	480-86459-1
CS-31 (BOTTOM 1.0')	9/1/2015	DKP	Base of excavation	AECOM	9/4/2015	480-86458-1
CS-32 (SIDEWALL 0.5')	9/1/2015	DKP	Sidewall	AECOM	9/4/2015	480-86458-1
CS-7 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	AECOM	9/4/2015	480-86459-1
CS-8 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	AECOM	9/4/2015	480-86459-1
CS-9 (SIDEWALL 1.0')	9/1/2015	GE	Planned Sidewall at base	AECOM	9/4/2015	480-86459-1
COMMON FILL	9/1/2015	NA	Imported Fill	Clean Harbors	9/9/2015	480-86456-1
TOPSOIL	9/1/2015	NA	Imported Fill	Clean Harbors	9/9/2015	480-86456-1
TYPE II	9/1/2015	NA	Imported Fill	Clean Harbors	9/9/2015	480-86456-1
CS-33 (BOTTOM 1.0')	9/4/2015	GE	Base of excavation	AECOM	9/10/2015	480-86752-1
CS-34 (BOTTOM 1.0')	9/4/2015	GE	Base of excavation	AECOM	9/10/2015	480-86752-1
CS-35 (BOTTOM 1.0')	9/4/2015	GE	Base of excavation	AECOM	9/10/2015	480-86752-1
20150909-FD-1	9/9/2015	GE	Field Duplicate (CS-37)	AECOM	9/14/2015	480-86925-1
20150909-RB-1	9/9/2015	GE	Rinse Blank	AECOM	9/14/2015	480-86925-1
CS-36 (BOTTOM 1.0')	9/9/2015	GE	Base of excavation	AECOM	9/14/2015	480-86925-1
CS-37 (BOTTOM 1.0')	9/9/2015	GE	Base of excavation	AECOM	9/14/2015	480-86925-1
CS-38 (BOTTOM 1.0')	9/9/2015	GE	Base of excavation	AECOM	9/14/2015	480-86925-1
CS-39 (BOTTOM 1.0')	9/9/2015	GE	Base of excavation	AECOM	9/14/2015	480-86925-1
CS-39 (BOTTOM 1.0')MS	9/9/2015	GE	Base of excavation	AECOM	9/14/2015	480-86925-1
CS-39 (BOTTOM 1.0')MSD	9/9/2015	GE	Base of excavation	AECOM	9/14/2015	480-86925-1
CS-40 (BOTTOM 1.0')	9/9/2015	DKP	Base of excavation	AECOM	9/14/2015	480-86924-1
CS-41 (BOTTOM 1.0')	9/9/2015	DKP	Base of excavation	AECOM	9/14/2015	480-86924-1
CS-42 (BOTTOM 1.0')	9/9/2015	DKP	Base of excavation	AECOM	9/14/2015	480-86924-1
CS-43 (SIDEWALL 0.5')	9/9/2015	DKP	Sidewall	AECOM	9/14/2015	480-86924-1
CS-44 (SIDEWALL 0.5')	9/9/2015	DKP	Sidewall	AECOM	9/14/2015	480-86924-1
CS-45 (SIDEWALL 0.5')	9/9/2015	DKP	Sidewall	AECOM	9/14/2015	480-86924-1
CS-31A (BOTTOM 1.5')	9/10/2015	DKP	Base of excavation	AECOM	9/14/2015	480-87000-1
CS-46 (SIDEWALL 0.5')	9/10/2015	DKP	Sidewall	AECOM	9/14/2015	480-87000-1
CS-47 (SIDEWALL 0.5')	9/10/2015	DKP	Sidewall	AECOM	9/14/2015	480-87000-1
CS-48 (SIDEWALL 1.0')	9/10/2015	GE	Sidewall	AECOM	9/11/2015	480-87000-2
CS-49 (SIDEWALL 1.0')	9/10/2015	GE	Sidewall	AECOM	9/11/2015	480-87000-2

TABLE 2
SUMMARY OF SAMPLES
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID	Sample Date	Property	Sample Type	Sampled By	Final Results Received	Laboratory Job Number
CS-50 (BOTTOM 1.0')	9/10/2015	GE	Base of excavation	AECOM	9/11/2015	480-87000-2
CS-51 (BOTTOM 1.0')	9/10/2015	GE	Base of excavation	AECOM	9/14/2015	480-87000-1
CS-52 (BOTTOM 5.0')	9/18/2015	GE	Base of excavation	AECOM	9/28/2015	480-87764-1
CS-53 (BOTTOM 5.0')	9/18/2015	GE	Base of excavation	AECOM	9/28/2015	480-87764-1
CS-54 (BOTTOM 5.5')	9/18/2015	GE	Base of excavation	AECOM	9/28/2015	480-87764-1
20150923-FD-1	9/23/2015	DKP	Field Duplicate (CS-61)	AECOM	9/28/2015	480-87764-1
20150923-RB-1	9/23/2015	DKP	Rinse Blank	AECOM	9/28/2015	480-87764-1
CS-55 (BOTTOM 5.5')	9/23/2015	GE	Base of excavation	AECOM	9/28/2015	480-87764-1
CS-56 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	AECOM	9/28/2015	480-87764-1
CS-57 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	AECOM	9/24/2015	480-87764-2
CS-58 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	AECOM	9/28/2015	480-87764-1
CS-59 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	AECOM	9/28/2015	480-87764-2
CS-60 (SIDEWALL 0.5')	9/23/2015	DKP	Sidewall	AECOM	9/28/2015	480-87764-1
CS-61 (SIDEWALL 0.5')	9/23/2015	DKP	Sidewall	AECOM	9/28/2015	480-87764-1
CS-62 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	AECOM	9/24/2015	480-87764-2
CS-62 (BOTTOM 1.0')MS	9/23/2015	GE	Base of excavation	AECOM	9/24/2015	480-87764-2
CS-62 (BOTTOM 1.0')MSD	9/23/2015	GE	Base of excavation	AECOM	9/24/2015	480-87764-2
CS-63 (BOTTOM 1.0')	9/23/2015	DKP	Base of excavation	AECOM	9/24/2015	480-87764-2
CS-64 (SIDEWALL 0.5')	9/23/2015	DKP	Sidewall	AECOM	9/28/2015	480-87764-1
CS-65 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	AECOM	9/24/2015	480-87764-2
CS-66 (SIDEWALL 1.0')	9/23/2015	GE	Sidewall	AECOM	9/28/2015	480-87764-1
CS-67 (SIDEWALL 0.5')	9/23/2015	DKP	Sidewall	AECOM	9/28/2015	480-87764-1
CS-68 (BOTTOM 1.0')	9/24/2015	GE	Base of excavation	AECOM	9/28/2015	480-87854-1
CS-69 (SIDEWALL 1.5')	9/24/2015	GE	Sidewall	AECOM	9/28/2015	480-87854-1
CS-70 (SIDEWALL 1.5')	9/24/2015	GE	Sidewall	AECOM	9/28/2015	480-87854-1
CS-70 (SIDEWALL 1.5') TCLP	9/30/2015	GE	Sidewall	AECOM	10/5/2015	480-88151-2
CS-71 (SIDEWALL 1.5')	9/24/2015	GE	Sidewall	AECOM	9/28/2015	480-87854-1
CS-72 (SIDEWALL 1.5')	9/24/2015	GE	Sidewall	AECOM	9/28/2015	480-87854-1
CS-117 (SIDEWALL 1.5')	10/7/2015	GE	Sidewall (step out for CS-72)	AECOM	10/8/2015	480-88611-1
CS-73 (SIDEWALL 0.5')	9/24/2015	GE	Sidewall (step out for CS-7)	AECOM	9/28/2015	480-87854-1
CS-74 (SIDEWALL 0.5')	9/24/2015	GE	Sidewall (step out for CS-7)	AECOM	9/28/2015	480-87854-1
CS-75 (BOTTOM 1.0')	9/24/2015	GE	Base of excavation (step out for CS-7)	AECOM	9/28/2015	480-87854-1
RWT EXC 10.5'	9/24/2015	GE	Interim RWTP Sidewall	AECOM	9/28/2015	480-87854-2
RWT EXC 8.0'	9/24/2015	GE	Interim RWTP Sidewall	AECOM	9/28/2015	480-87854-2
CS-24A (BOTTOM 1.5')	9/25/2015	GE	Deeper Base	AECOM	9/29/2015	480-87954-2
CS-25A (BOTTOM 1.5')	9/25/2015	GE	Deeper Base	AECOM	9/29/2015	480-87954-2
CS-65A (BOTTOM 1.5')	9/25/2015	GE	Deeper Base	AECOM	9/29/2015	480-87954-2
CS-78 (BOTTOM 1.0')	9/25/2015	DOT	Base of excavation	AECOM	9/30/2015	480-87953-1
CS-79 (SIDEWALL 0.5')	9/25/2015	DOT	Sidewall	AECOM	9/30/2015	480-87953-1
CS-80 (SIDEWALL 0.5')	9/25/2015	DOT	Sidewall	AECOM	9/30/2015	480-87953-1
CS-9A (SIDEWALL 2.0')	9/25/2015	GE	Deeper Sidewall	AECOM	9/30/2015	480-87954-1
20150928-FD-1	9/28/2015	GE	Field Duplicate (CS-86)	AECOM	9/30/2015	480-88008-1
CS-76 (BOTTOM 1.0')	9/28/2015	DOT	Base of excavation	AECOM	9/30/2015	480-88008-2
CS-77 (BOTTOM 1.0')	9/28/2015	DOT	Base of excavation	AECOM	9/30/2015	480-88008-2
CS-81 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	AECOM	9/30/2015	480-88008-2
CS-82 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	AECOM	9/30/2015	480-88008-2
CS-83 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	AECOM	9/30/2015	480-88008-2
CS-84 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	AECOM	9/30/2015	480-88008-2
CS-85 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	AECOM	9/30/2015	480-88008-2
CS-86 (SIDEWALL 5.0')	9/28/2015	GE	Sidewall	AECOM	9/30/2015	480-88008-1
CS-87 (SIDEWALL 5.0')	9/28/2015	GE	Sidewall	AECOM	9/30/2015	480-88008-1
CS-88 (SIDEWALL 5.5')	9/28/2015	GE	Sidewall	AECOM	9/30/2015	480-88008-1
CS-89 (SIDEWALL 5.0')	9/28/2015	GE	Sidewall	AECOM	9/30/2015	480-88008-1
20150930-RB-1	9/30/2015	GE	Rinse Blank	AECOM	10/5/2015	480-88151-3
CS-59A (BOTTOM 1.5')	9/30/2015	GE	Deeper Base	AECOM	10/1/2015	480-88151-1
CS-59A (BOTTOM 1.5')MS	9/30/2015	GE	Deeper Base	AECOM	10/1/2015	480-88151-1
CS-59A (BOTTOM 1.5')MS	9/30/2015	GE	Deeper Base	AECOM	10/1/2015	480-88151-1
CS-62A (BOTTOM 1.5')	9/30/2015	GE	Deeper Base	AECOM	10/1/2015	480-88151-1
CS-63A (BOTTOM 1.5')	9/30/2015	DKP	Deeper Base	AECOM	10/1/2015	480-88152-1
CS-90 (SIDEWALL 0.5')	9/30/2015	DKP	Sidewall	AECOM	10/2/2015	480-88152-2
CS-100 (SIDEWALL 12.0')	10/1/2015	GE	Sidewall	AECOM	10/2/2015	480-88271-1
CS-101 (SIDEWALL 5.0')	10/1/2015	GE	Sidewall	AECOM	10/2/2015	480-88271-1
CS-91 (SIDEWALL 5.5')	10/1/2015	GE	Sidewall	AECOM	10/2/2015	480-88271-1
CS-92 (SIDEWALL 1.5')	10/1/2015	GE	Sidewall	AECOM	10/2/2015	480-88271-1
CS-93 (SIDEWALL 1.5')	10/1/2015	GE	Sidewall	AECOM	10/2/2015	480-88271-1

TABLE 2
SUMMARY OF SAMPLES
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID	Sample Date	Property	Sample Type	Sampled By	Final Results Received	Laboratory Job Number
CS-94 (SIDEWALL 1.5')	10/1/2015	GE	Sidewall	AECOM	10/2/2015	480-88271-1
CS-95 (SIDEWALL 1.5')	10/1/2015	GE	Sidewall	AECOM	10/2/2015	480-88271-1
CS-96 (SIDEWALL 12.0')	10/1/2015	GE	Sidewall	AECOM	10/2/2015	480-88271-1
CS-97 (BOTTOM 12.0')	10/1/2015	GE	Base of excavation	AECOM	10/2/2015	480-88271-1
CS-98 (SIDEWALL 12.0')	10/1/2015	GE	Sidewall	AECOM	10/2/2015	480-88271-1
CS-99 (SIDEWALL 12.0')	10/1/2015	GE	Sidewall	AECOM	10/2/2015	480-88271-1
CS-102 (SIDEWALL 2.5')	10/2/2015	GE	Sidewall (step out for CS-71)	AECOM	10/6/2015	480-88355-1
CS-103 (SIDEWALL 5.0')	10/2/2015	GE	Sidewall (step out for CS-87)	AECOM	10/6/2015	480-88355-1
20151006-FD-1	10/6/2015	DKP	Field Duplicate (CS-105)	AECOM	10/9/2015	480-88489-1
20151006-RB-1	10/6/2015	DKP	Rinse Blank	AECOM	10/9/2015	480-88489-1
CS-104 (BOTTOM 1.5')	10/6/2015	GE	Base of excavation	AECOM	10/8/2015	480-88492-1
CS-105 (BOTTOM 1.5')	10/6/2015	DKP	Base of excavation	AECOM	10/9/2015	480-88489-1
CS-106 (SIDEWALL 0.5')	10/6/2015	DKP	Sidewall	AECOM	10/9/2015	480-88489-1
CS-106 (SIDEWALL 0.5')MS	10/6/2015	DKP	Sidewall	AECOM	10/9/2015	480-88489-1
CS-106 (SIDEWALL 0.5')MSD	10/6/2015	DKP	Sidewall	AECOM	10/9/2015	480-88489-1
CS-107 (BOTTOM 1.5')	10/6/2015	GE	Base of excavation	AECOM	10/9/2015	480-88492-2
CS-108 (SIDEWALL 0.5')	10/6/2015	DKP	Sidewall	AECOM	10/9/2015	480-88489-1
CS-109 (SIDEWALL 1.0')	10/6/2015	GE	Sidewall	AECOM	10/9/2015	480-88492-2
CS-110 (BOTTOM 1.5')	10/6/2015	GE	Base of excavation	AECOM	10/9/2015	480-88492-2
CS-111 (BOTTOM 1.5')	10/6/2015	DKP	Base of excavation	AECOM	10/9/2015	480-88489-1
CS-112 (SIDEWALL 0.5')	10/6/2015	DKP	Sidewall	AECOM	10/9/2015	480-88489-1
CS-113 (BOTTOM 1.5')	10/6/2015	GE	Base of excavation	AECOM	10/8/2015	480-88492-1
CS-114 (SIDEWALL 2.0')	10/6/2015	GE	Sidewall	AECOM	10/9/2015	480-88492-2
CS-115 (SIDEWALL 2.0')	10/6/2015	GE	Sidewall	AECOM	10/9/2015	480-88492-2
CS-116 (SIDEWALL 0.5')	10/6/2015	DOT	Sidewall	AECOM	10/9/2015	480-88495-1
W001	10/6/2015	NA	Waste Water	Clean Harbors	10/7/2015	480-88487-1
CS-118 (SIDEWALL 2.5')	10/7/2015	GE	Sidewall	AECOM	10/8/2015	480-88611-2
CS-119 (BOTTOM 2.0')	10/7/2015	GE	Base of excavation	AECOM	10/8/2015	480-88611-2
20151009-FD-1	10/9/2015	GE	Field Duplicate (CS-120)	AECOM	10/14/2015	480-88860-1
20151009-RB-1	10/9/2015	GE	Rinse Blank	AECOM	10/14/2015	480-88860-1
CS-120 (BOTTOM 1.0')	10/9/2015	GE	Base of excavation	AECOM	10/14/2015	480-88860-1
CS-121 (BOTTOM 1.5')	10/9/2015	GE	Base of excavation	AECOM	10/13/2015	480-88860-2
CS-122 (SIDEWALL 0.5')	10/9/2015	DKP	Sidewall	AECOM	10/13/2015	480-88859-1
CS-122 (SIDEWALL 0.5')MS	10/9/2015	DKP	Sidewall	AECOM	10/13/2015	480-88859-1
CS-122 (SIDEWALL 0.5')MSD	10/9/2015	DKP	Sidewall	AECOM	10/13/2015	480-88859-1
CS-123 (BOTTOM 1.0')	10/9/2015	DKP	Base of excavation	AECOM	10/13/2015	480-88859-1
CS-124 (SIDEWALL 0.5')	10/9/2015	DKP	Sidewall	AECOM	10/13/2015	480-88859-1
CS-125 (SIDEWALL 0.5')	10/9/2015	DKP	Sidewall	AECOM	10/13/2015	480-88859-1
CS-126 (SIDEWALL 0.5')	10/9/2015	DKP	Sidewall	AECOM	10/13/2015	480-88859-1
CS-106A (SIDEWALL 0.5')	10/12/2015	DKP	Base of excavation	AECOM	10/15/2015	480-88932-1
CS-109A (SIDEWALL 2.0')	10/12/2015	GE	Sidewall	AECOM	10/15/2015	480-88931-1
CS-118A (SIDEWALL 4.0')	10/12/2015	GE	Sidewall	AECOM	10/15/2015	480-88931-1
CS-119A (BOTTOM 3.0')	10/12/2015	GE	Base of excavation	AECOM	10/15/2015	480-88931-1
20151013-FD-1	10/13/2015	DKP	Field Duplicate (CS-131)	AECOM	10/15/2015	480-88991-1
20151013-RB-1	10/13/2015	GE	Rinse Blank	AECOM	10/15/2015	480-88990-1
CS-127 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	AECOM	10/14/2015	480-88990-2
CS-128 (BOTTOM 2.0')	10/13/2015	GE	Base of excavation	AECOM	10/15/2015	480-88990-1
CS-129 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	AECOM	10/15/2015	480-88990-1
CS-130 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	AECOM	10/15/2015	480-88990-1
CS-131 (BOTTOM 1.0')	10/13/2015	DKP	Base of excavation	AECOM	10/15/2015	480-88991-1
CS-132 (SIDEWALL 0.5')	10/13/2015	DKP	Sidewall	AECOM	10/14/2015	480-88991-2
CS-133 (SIDEWALL 0.5')	10/13/2015	DKP	Sidewall	AECOM	10/15/2015	480-88991-1
CS-133 (SIDEWALL 0.5')MS	10/13/2015	DKP	Sidewall	AECOM	10/15/2015	480-88991-1
CS-133 (SIDEWALL 0.5')MSD	10/13/2015	DKP	Sidewall	AECOM	10/15/2015	480-88991-1
CS-134 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	AECOM	10/15/2015	480-88990-1
CS-135 (SIDEWALL 0.5')	10/13/2015	DKP	Sidewall	AECOM	10/15/2015	480-88991-1
CS-136 (SIDEWALL 0.5')	10/13/2015	DKP	Sidewall	AECOM	10/15/2015	480-88991-1
CS-137 (SIDEWALL 0.5')	10/13/2015	DKP	Sidewall	AECOM	10/14/2015	480-88991-2
CS-138 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	AECOM	10/15/2015	480-88990-1
CS-139 (BOTTOM 1.0')	10/13/2015	DKP	Base of excavation	AECOM	10/14/2015	480-88991-2
CS-140 (SIDEWALL 0.8')	10/14/2015	DKP	Sidewall	AECOM	10/15/2015	480-89056-1
20151015-FD-1	10/15/2015	DKP	Field Duplicate (CS-143)	AECOM	10/19/2015	480-89242-1
20151015-RB-1	10/15/2015	DKP	Rinse Blank	AECOM	10/19/2015	480-89242-1
CS-141 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall (step out for CS-132)	AECOM	10/19/2015	480-89242-1
CS-142 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall (step out for CS-137)	AECOM	10/19/2015	480-89242-1

TABLE 2
SUMMARY OF SAMPLES
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID	Sample Date	Property	Sample Type	Sampled By	Final Results Received	Laboratory Job Number
CS-143 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall	AECOM	10/19/2015	480-89242-1
CS-144 (BOTTOM 1.0')	10/15/2015	DKP	Base of excavation	AECOM	10/19/2015	480-89242-1
CS-145 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall	AECOM	10/19/2015	480-89242-1
CS-145 (SIDEWALL 0.5')MS	10/15/2015	DKP	Sidewall	AECOM	10/19/2015	480-89242-1
CS-145 (SIDEWALL 0.5')MSD	10/15/2015	DKP	Sidewall	AECOM	10/19/2015	480-89242-1
CS-146 (SIDEWALL 0.5')	10/15/2015	GE	Sidewall	AECOM	10/16/2015	480-89241-1
CS-147 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall (step out for CS-136)	AECOM	10/19/2015	480-89242-1
CS-109B (SIDEWALL 3.0')	10/16/2015	GE	Sidewall	AECOM	10/19/2015	480-89281-1
20151019 WASTEWATER	10/19/2015	NA	Waste Water	AECOM	10/22/2015	480-89387-1
CS-148 (SIDEWALL 0.5')	10/19/2015	DKP	Sidewall (step out for CS-142)	AECOM	10/20/2015	480-89385-1
W002	10/20/2015	NA	Waste water	Clean Harbors	10/22/2015	480-89474-1
CS-149 (SIDEWALL 0.5')	10/21/2015	DKP	Sidewall (step out for CS-148)	AECOM	10/22/2015	480-89523-1
TANK 1 - SED	10/22/2015	NA	Waste	Clean Harbors	10/23/2015	480-89679-1
TANK 2 - SED	10/22/2015	NA	Waste	AECOM	10/23/2015	480-89678-1
W003	10/26/2015	NA	Waste Water	Clean Harbors	10/27/2015	480-89828-1
W004	11/3/2015	NA	Waste Water	Clean Harbors	11/4/2015	480-90358-1
WC - CONCRETE SOUTH	11/9/2015	GE	Waste Characterization	AECOM	11/13/2015	480-90880-1
W005	11/11/2015	NA	Waste Water	Clean Harbors	11/11/2015	480-90899-1
WC - CONCRETE NORTHEAST	11/11/2015	GE	Waste Characterization	AECOM	11/13/2015	480-90880-1
254297 PASS SIDE 7' UP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
254297 BACK WALL 5' UP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
254297 FRONT WALL 3' UP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
254297 DRIVER WALL 4' UP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
254297 FLOOR AT "V"	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
29735 PASS SIDE 7' UP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
29735 BACK WALL 5' UP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
29735 FRONT WALL 3' UP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
29735 DRIVER WALL 4' UP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
29735 FLOOR AT "V"	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
251180 DRIVER WALL 4' UP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
251180 FRONT WALL 3' UP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
251180 BACK WALL 5' UP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
251180 PASS WALL 7' UP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
251180 FLOOR AT "V"	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
POT 260380	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
POT 260385	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91594-1
ID 4166 SIDE	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91593-1
ID 4166 BOTTOM	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91593-1
ID CH1018 FRONT TANK BOTTOM	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91593-1
ID CH1018 FRONT TANK TOP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91593-1
ID CH1018 BANK TANK TOP	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91593-1
ID CH1018 FILTER TOWER	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91593-1
ID CH1018 BACK TANK BOTTOM	11/21/2015	NA	Equipment Wipes	Clean Harbors	11/25/2015	480-91593-1
WC - ROLLOFF	11/24/2015	NA	Waste Characterization	AECOM	11/30/2015	480-91688-1

Note:
1. NA - Not Applicable

TABLE 3
AIR MONITORING UNIT LOCATIONS
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Dates	Air Monitoring Unit No. 1 Upwind Location	Air Monitoring Unit No. 2 Downwind Location	Comments
8/12/2015 -11/23/15	SE corner of GE parking lot	NE corner of GE property	Standard AMU locations for the prevailing winds. 8/12/15 is the first day of AMU operation.
Exceptions:			
9/4/2015	SE corner of GE parking lot	NE corner of GE property	Approx. 180 degree wind change at 1210, and the upwind AMU (No. 1) becomes the downwind and vice versa. AMU locations not changed this date.
9/10/2015	SE corner of GE parking lot	NE corner of GE property	Upwind AMU (No. 1) actually recorded downwind data and vice versa due to contrary winds.
9/11/2015	NE corner of GE property	SE corner of GE parking lot	
9/21/2015	SE corner of GE parking lot	NE corner of GE property	Upwind AMU (No. 1) actually recorded downwind data and vice versa due to contrary winds.
9/23/2015	SE corner of GE parking lot	NE corner of GE property	Upwind AMU (No. 1) actually recorded downwind data and vice versa due to contrary winds.
9/24/2015	NE corner of GE property	SE corner of GE parking lot	
9/25/2015	NE corner of GE property	SE corner of GE parking lot	
9/30/2015	NE corner of GE property	SE corner of GE parking lot	
10/1/2015	NE corner of GE property	SE corner of GE parking lot	
10/2/2015	NE corner of GE property	SE corner of GE parking lot	
10/3/2015	NE corner of GE property	SE corner of GE parking lot	
10/9/2015	NA	NA	Not set up - rain.
10/26/2015	SE corner of GE parking lot	NE corner of GE property	Approx. 180 degree wind change at 1230, and the upwind AMU (No. 1) becomes the downwind and vice versa. AMU locations not changed this date.
10/27/2015	NE corner of GE property	SE corner of GE parking lot	
10/28/2015	NA	NA	Not set up - rain.
10/29/2015	NA	NA	Not set up - rain.
11/10/2015	NA	NA	Not set up - no excavation activities.
11/11/2015	NA	NA	Not set up - no excavation activities.
11/13/2015	NA	NA	Not set up - no excavation activities.
11/21/2015	DKP pallet storage area	GE entrance gate	
11/22/2015	SE corner of GE parking lot	SW corner of GE parking lot	
11/23/2015	NW corner of Hertz property	Central along eastern fence	11/23/15 is the last day of AMU operation.

Notes:

1. This table shows the approximate locations of the Air Monitoring Units (AMUs) throughout the project. For the majority of the project, typical southwest (SW) winds prevailed and resulted in the upwind AMU station being paced at the southeast (SE) corner of the General Electric (GE) parking lot, and the downwind station being placed at the northeast (NE) corner of the GE property, just south of the Department of Transportation right of way. Changes to these typical locations are provided in the table, along with several instances where the upwind and downwind readings were reversed due to wind changes during the day, without changing the station locations.
2. "NA" indicates that the units were not set up on that particular day; the reason provided in the comments.

TABLE 4
SUMMARY OF PCB RESULTS FOR CONFIRMATORY SOIL SAMPLES
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID	Sample Date	Property	Sample Type	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs	Excavated/ Remains
CS-1 (SIDEWALL 0.5)	8/20/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND	Remains
CS-2 (BOTTOM 1.0)	8/20/2015	DKP	Base of excavation	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND	Remains
CS-3 (SIDEWALL 0.5')	8/20/2015	GE	Sidewall, edge of pavement	<0.29	<0.29	<0.29	<0.29	<0.29	**1.1 J**	**1.9**	**3.0[6] J**	Remains
CS-4 (SIDEWALL 0.5')	8/21/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND	Remains
CS-5 (BOTTOM 1.0')	8/21/2015	DKP	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND	Remains
CS-6 (SIDEWALL 0.5')	8/21/2015	GE	Sidewall, edge of pavement	<1.4	<1.4	<1.4	<1.4	**1.5 NJ**	<1.4	**11**	**12.5[6] NJ**	Remains
CS-7 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	<1.4	<1.4	<1.4	<1.4	<1.4	**20**	**14**	**34**	Excavated
CS-8 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	**0.19 J**	**0.19 J**	Remains
CS-9 (SIDEWALL 1.0')	9/1/2015	GE	Planned Sidewall at base	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	**2.4**	**2.4**	Excavated
CS-9A (SIDEWALL 2.0')	9/25/2015	GE	Deeper Sidewall	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND	Remains
CS-10 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND	Remains
CS-11 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND	Remains
CS-12 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	ND	Remains
CS-13 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.12 J**	**0.12 J**	Remains
CS-14 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	**0.18 J**	**0.18 J**	Remains
CS-15 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND	Remains
CS-16 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	ND	Remains
CS-17 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND	Remains
CS-18 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	**0.45**	**0.45**	Remains
CS-19 (BOTTOM 1.0')	9/1/2015	Lamar	Base of excavation	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	**0.88**	**0.88**	Remains
20150901-FD-1	9/1/2015	Lamar	Field Duplicate (CS-19)	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	**0.53**	**0.53**	Remains
CS-20 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	**0.24**	**0.24**	Remains
CS-21 (SIDEWALL 0.5')	9/1/2015	Lamar	Sidewall	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	**0.17 NJ**	**0.17 NJ**	Remains
CS-22 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND	Remains
CS-23 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND	Remains
CS-24 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.53	<0.53	<0.53	<0.53	<0.53	<0.53	**7.6**	**7.6**	Excavated
CS-24A (BOTTOM 1.5')	9/25/2015	GE	Deeper Base	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND	Remains
CS-25 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	**3.6**	**3.6**	Excavated
CS-25A (BOTTOM 1.5')	9/25/2015	GE	Deeper Base	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND	Remains
CS-26 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**0.57**	**0.57**	Remains
CS-27 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	**0.56**	**0.56**	Remains
CS-28 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	**0.43**	**0.43**	Remains
CS-29 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	**0.91**	**0.91**	Remains
CS-30 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	**0.96**	**0.96**	Remains
CS-31 (BOTTOM 1.0')	9/1/2015	DKP	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**1.2**	**1.2**	Excavated
CS-31A (BOTTOM 1.5')	9/10/2015	DKP	Base of excavation	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND	Remains
CS-32 (SIDEWALL 0.5')	9/1/2015	DKP	Sidewall	<1.3	<1.3	<1.3	<1.3	<1.3	<1.3	**13**	**13**	Excavated
CS-33 (BOTTOM 1.0')	9/4/2015	GE	Base of excavation	<0.24	<0.24	<0.24	<0.24	<0.24	**0.22 J**	**0.21 J**	**0.43 J**	Remains
CS-34 (BOTTOM 1.0')	9/4/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND	Remains
CS-35 (BOTTOM 1.0')	9/4/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND	Remains
CS-36 (BOTTOM 1.0')	9/9/2015	GE	Base of excavation	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	**0.32**	**0.32**	Remains
CS-37 (BOTTOM 1.0')	9/9/2015	GE	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	**0.12 NJ**	**0.12 NJ**	Remains
20150909-FD-1	9/9/2015	GE	Field Duplicate (CS-37)	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	**0.21 J**	**0.21 J**	Remains
CS-38 (BOTTOM 1.0')	9/9/2015	GE	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND	Remains
CS-39 (BOTTOM 1.0')	9/9/2015	GE	Base of excavation	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND	Remains
CS-40 (BOTTOM 1.0')	9/9/2015	DKP	Base of excavation	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	**0.21 J**	**0.21 J**	Remains

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Sample ID	Sample Date	Property	Sample Type	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs	Excavated/ Remains
CS-41 (BOTTOM 1.0')	9/9/2015	DKP	Base of excavation	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	**0.45**	**0.45**	Remains
CS-42 (BOTTOM 1.0')	9/9/2015	DKP	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	**0.17 J**	**0.17 J**	Remains
CS-43 (SIDEWALL 0.5')	9/9/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	**0.29**	**0.29**	Remains
CS-44 (SIDEWALL 0.5')	9/9/2015	DKP	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.12 NJ**	**0.12 NJ**	Remains
CS-45 (SIDEWALL 0.5')	9/9/2015	DKP	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	**0.47**	**0.47**	Remains
CS-46 (SIDEWALL 0.5')	9/10/2015	DKP	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND	Remains
CS-47 (SIDEWALL 0.5')	9/10/2015	DKP	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**0.29**	**0.29**	Remains
CS-48 (SIDEWALL 1.0')	9/10/2015	GE	Sidewall	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND	Remains
CS-49 (SIDEWALL 1.0')	9/10/2015	GE	Sidewall	<0.34	<0.34	<0.34	<0.34	<0.34	<0.34	<0.34	ND	Remains
CS-50 (BOTTOM 1.0')	9/10/2015	GE	Base of excavation	<0.32	<0.32	<0.32	<0.32	<0.32	<0.32	<0.32	ND	Remains
CS-51 (BOTTOM 1.0')	9/10/2015	GE	Base of excavation	<0.26	<0.26	<0.26	<0.26	**0.086 NJ**	**0.16 J**	<0.26	**0.25 NJ**	Remains
CS-52 (BOTTOM 5.0')	9/18/2015	GE	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	**0.13 J**	**0.13 J**	Remains
CS-53 (BOTTOM 5.0')	9/18/2015	GE	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND	Remains
CS-54 (BOTTOM 5.5')	9/18/2015	GE	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND	Remains
CS-55 (BOTTOM 5.5')	9/23/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	**0.30**	**0.16 J**	**0.46 J**	Remains
CS-56 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND	Remains
CS-57 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	<0.29	<0.29	<0.29	**0.36**	<0.29	<0.29	**0.33**	**0.69**	Remains
CS-58 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	<0.22	<0.22	<0.22	**0.23**	<0.22	<0.22	**0.33**	**0.56**	Remains
CS-59 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	<0.29	<0.29	<0.29	**4.4**	<0.29	<0.29	**3.4**	**7.8**	Excavated
CS-59A (BOTTOM 1.5')	9/30/2015	GE	Deeper Base	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND	Remains
CS-60 (SIDEWALL 0.5')	9/23/2015	DKP	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	**0.17 J**	**0.17 J**	Remains
CS-61 (SIDEWALL 0.5')	9/23/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	**0.34**	**0.47 J**	**0.81 J**	Remains
20150923-FD-1	9/23/2015	DKP	Field Duplicate (CS-61)	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	**0.40 J**	**0.40 J**	Remains
CS-62 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	<2.0	<2.0	<2.0	<2.0	**2.4 J**	<2.0	**13**	**15.4 J**	Excavated
CS-62A (BOTTOM 1.5')	9/30/2015	GE	Deeper Base	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND	Remains
CS-63 (BOTTOM 1.0')	9/23/2015	DKP	Base of excavation	<0.24	<0.24	<0.24	<0.24	**0.31**	<0.24	**1.4 J**	**1.7 J**	Excavated
CS-63A (BOTTOM 1.5')	9/30/2015	DKP	Deeper Base	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND	Remains
CS-64 (SIDEWALL 0.5')	9/23/2015	DKP	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.26 J**	**0.26 J**	Remains
CS-65 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	<5.2	<5.2	<5.2	**1.5 J**	<5.2	<5.2	**55 J**	**57 J**	Excavated
CS-65A (BOTTOM 1.5')	9/25/2015	GE	Deeper Base	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND	Remains
CS-66 (SIDEWALL 1.0')	9/23/2015	GE	Sidewall	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND	Remains
CS-67 (SIDEWALL 0.5')	9/23/2015	DKP	Sidewall	<0.25	<0.25	<0.25	**0.41**	<0.25	<0.25	**0.90**	**1.3**	Excavated
CS-90 (SIDEWALL 0.5')	9/30/2015	DKP	Sidewall	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND	Remains
CS-68 (BOTTOM 1.0')	9/24/2015	GE	Base of excavation	<0.50	<0.50	<0.50	<0.50	<0.50	<0.50	**5.1**	**5.1**	Excavated
CS-69 (SIDEWALL 1.5')	9/24/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND	Remains
CS-70 (SIDEWALL 1.5')	9/24/2015	GE	Sidewall	<100	<100	<100	<100	<100	<100	**1,500**	**1,500**	Excavated
CS-71 (SIDEWALL 1.5')	9/24/2015	GE	Sidewall	<0.41	<0.41	<0.41	<0.41	<0.41	<0.41	**5.0**	**5.0**	Excavated
CS-102 (SIDEWALL 2.5')	10/2/2015	GE	Sidewall (step out for CS-71)	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND	Remains
CS-72 (SIDEWALL 1.5')	9/24/2015	GE	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	**1.5**	**1.5**	Excavated
CS-117 (SIDEWALL 1.5')	10/7/2015	GE	Sidewall (step out for CS-72)	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	**0.11 J**	**0.11 J**	Remains
CS-73 (SIDEWALL 0.5')	9/24/2015	GE	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND	Remains
CS-74 (SIDEWALL 0.5')	9/24/2015	GE	Sidewall	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	ND	Remains
CS-75 (BOTTOM 1.0')	9/24/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	**0.15 J**	**0.15 J**	Remains
CS-76 (BOTTOM 1.0')	9/28/2015	DOT	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**0.41**	**0.41**	Remains
CS-77 (BOTTOM 1.0')	9/28/2015	DOT	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND	Remains
CS-78 (BOTTOM 1.0')	9/25/2015	DOT	Base of excavation	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND	Remains

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CS-79 (SIDEWALL 0.5')	9/25/2015	DOT	Sidewall	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	**1.4**	**1.4**	Excavated
CS-80 (SIDEWALL 0.5')	9/25/2015	DOT	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.29**	**0.29**	Remains
CS-81 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND	Remains
CS-82 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.38**	**0.38**	Remains
CS-83 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.42**	**0.42**	Remains
CS-84 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	**0.49**	**0.49**	Remains
CS-85 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	**0.29 J**	**0.29 J**	Remains
CS-86 (SIDEWALL 5.0')	9/28/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**0.40**	**0.40**	Remains
20150928-FD-1	9/28/2015	GE	Field Duplicate (CS-86)	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND	Remains
CS-87 (SIDEWALL 5.0')	9/28/2015	GE	Sidewall	**0.51 J**	<1.1	<1.1	<1.1	<1.1	<1.1	**11**	**12 J**	Excavated
CS-103 (SIDEWALL 5.0')	10/2/2015	GE	Sidewall (step out for CS-87)	**0.044 NJ**	<0.22	<0.22	<0.22	<0.22	<0.22	**1.2**	**1.2 NJ**	Remains (AST)
CS-88 (SIDEWALL 5.5')	9/28/2015	GE	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	ND	Remains
CS-89 (SIDEWALL 5.0')	9/28/2015	GE	Sidewall	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	ND	Remains
CS-91 (SIDEWALL 5.5')	10/1/2015	GE	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND	Remains
CS-92 (SIDEWALL 1.5')	10/1/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND	Remains
CS-93 (SIDEWALL 1.5')	10/1/2015	GE	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND	Remains
CS-94 (SIDEWALL 1.5')	10/1/2015	GE	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND	Remains
CS-95 (SIDEWALL 1.5')	10/1/2015	GE	Sidewall	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	ND	Remains
CS-96 (SIDEWALL 12.0')	10/1/2015	GE	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	ND	Remains
CS-97 (BOTTOM 12.0')	10/1/2015	GE	Base of excavation	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	ND	Remains
CS-98 (SIDEWALL 12.0')	10/1/2015	GE	Sidewall	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND	Remains
CS-99 (SIDEWALL 12.0')	10/1/2015	GE	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND	Remains
CS-100 (SIDEWALL 12.0')	10/1/2015	GE	Sidewall	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND	Remains
CS-101 (SIDEWALL 5.0')	10/1/2015	GE	Sidewall	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND	Remains
CS-104 (BOTTOM 1.5')	10/6/2015	GE	Base of excavation	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	ND	Remains
CS-105 (BOTTOM 1.5')	10/6/2015	DKP	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND	Remains
20151006-FD-1	10/6/2015	DKP	Field Duplicate (CS-105)	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND	Remains
CS-106 (SIDEWALL 0.5')	10/6/2015	DKP	Sidewall	<0.22	<0.22	<0.22	<0.22	<0.22	**0.85**	**0.58**	**1.4**	Excavated
CS-106A (SIDEWALL 0.5')	10/12/2015	DKP	Sidewall	<0.30	<0.30	<0.30	<0.30	<0.30	<0.30	**0.60**	**0.60**	Remains
CS-107 (BOTTOM 1.5')	10/6/2015	GE	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND	Remains
CS-108 (SIDEWALL 0.5')	10/6/2015	DKP	Sidewall	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	**0.13 J**	**0.13 J**	Remains
CS-109 (SIDEWALL 1.0')	10/6/2015	GE	Sidewall	<0.51	<0.51	<0.51	<0.51	<0.51	<0.51	**10**	**10**	Excavated
CS-109A (SIDEWALL 2.0')	10/12/2015	GE	Sidewall	<2.7	<2.7	<2.7	<2.7	<2.7	<2.7	**17**	**17**	Excavated
CS-109B (SIDEWALL 3.0')	10/16/2015	GE	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND	Remains
CS-110 (BOTTOM 1.5')	10/6/2015	GE	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND	Remains
CS-111 (BOTTOM 1.5')	10/6/2015	DKP	Base of excavation	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND	Remains
CS-112 (SIDEWALL 0.5')	10/6/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND	Remains
CS-113 (BOTTOM 1.5')	10/6/2015	GE	Base of excavation	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND	Remains
CS-114 (SIDEWALL 2.0')	10/6/2015	GE	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.20 J**	**0.20 J**	Remains
CS-115 (SIDEWALL 2.0')	10/6/2015	GE	Sidewall	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND	Remains
CS-116 (SIDEWALL 0.5')	10/6/2015	DOT	Sidewall	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	**0.25 J**	**0.25 J**	Remains
CS-118 (SIDEWALL 2.5')	10/7/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**1.1**	**1.1**	Excavated
CS-118A (SIDEWALL 4.0')	10/12/2015	GE	Sidewall	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	**0.39**	**0.39**	Remains
CS-119 (BOTTOM 2.0')	10/7/2015	GE	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**3.2**	**3.2**	Excavated
CS-119A (BOTTOM 3.0')	10/12/2015	GE	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**0.14 NJ**	**0.14 NJ**	Remains
CS-120 (BOTTOM 1.0')	10/9/2015	GE	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.14 J**	**0.14 J**	Remains

TABLE 4
SUMMARY OF PCB RESULTS FOR CONFIRMATORY SOIL SAMPLES
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID	Sample Date	Property	Sample Type	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs	Excavated/ Remains
20151009-FD-1	10/9/2015	GE	Field Duplicate (CS-120)	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND	Remains
CS-121 (BOTTOM 1.5')	10/9/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND	Remains
CS-122 (SIDEWALL 0.5')	10/9/2015	DKP	Sidewall	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND	Remains
CS-123 (BOTTOM 1.0')	10/9/2015	DKP	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND	Remains
CS-124 (SIDEWALL 0.5')	10/9/2015	DKP	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND	Remains
CS-125 (SIDEWALL 0.5')	10/9/2015	DKP	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	ND	Remains
CS-126 (SIDEWALL 0.5')	10/9/2015	DKP	Sidewall	**0.12 J**	<0.20	<0.20	<0.20	<0.20	**2.0**	**0.49**	**2.6 J**	Excavated
CS-127 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND	Remains
CS-128 (BOTTOM 2.0')	10/13/2015	GE	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND	Remains
CS-129 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND	Remains
CS-130 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	ND	Remains
CS-131 (BOTTOM 1.0')	10/13/2015	DKP	Base of excavation	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND	Remains
20151013-FD-1	10/13/2015	DKP	Field Duplicate (CS-131)	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND	Remains
CS-132 (SIDEWALL 0.5')	10/13/2015	DKP	Sidewall	**0.17 NJ**	<0.23	<0.23	<0.23	<0.23	**2.4 J**	**0.54 J**	**3.1 NJ**	Excavated
CS-141 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall (step out for CS-132)	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND	Remains
CS-133 (SIDEWALL 0.5')	10/13/2015	DKP	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	ND	Remains
CS-134 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**0.87**	**0.87**	Remains
CS-135 (SIDEWALL 0.5')	10/13/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	**0.30**	**0.22 J**	**0.52 J**	Remains
CS-136 (SIDEWALL 0.5')	10/13/2015	DKP	Sidewall	**0.49 J**	<0.19	<0.19	<0.19	<0.19	**3.8**	**0.84 J**	**5.1 J**	Excavated
CS-147 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall (step out for CS-136)	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND	Remains
CS-137 (SIDEWALL 0.5')	10/13/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	**0.075 J**	<0.28	**1.1**	**1.2 J**	Excavated
CS-142 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall (step out for CS-137)	**0.13 NJ**	<0.21	<0.21	<0.21	<0.21	**3.4 J**	**0.79 J**	**4.3 NJ**	Excavated
CS-148 (SIDEWALL 0.5')	10/19/2015	DKP	Sidewall (step out for CS-142)	**0.34 J**	<0.45	<0.45	<0.45	<0.45	**5.9**	**1.2**	**7.4 J**	Excavated
CS-149 (SIDEWALL 0.5')	10/21/2015	DKP	Sidewall (step out for CS-148)	<0.26	<0.26	<0.26	<0.26	<0.26	**0.41**	<0.26	**0.41**	Remains
CS-138 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	**0.34**	**0.20 J**	**0.54 J**	Remains
CS-139 (BOTTOM 1.0')	10/13/2015	DKP	Base of excavation	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	ND	Remains
CS-140 (SIDEWALL 0.8')	10/15/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND	Remains
CS-143 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND	Remains
20151015-FD-1	10/15/2015	DKP	Field Duplicate (CS-143)	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND	Remains
CS-144 (BOTTOM 1.0')	10/15/2015	DKP	Base of excavation	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	ND	Remains
CS-145 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND	Remains
CS-146 (SIDEWALL 0.5')	10/15/2015	GE	Sidewall	<0.29	<0.29	<0.29	<0.29	**0.19 J**	<0.29	**2.7**	**2.9[6] J**	Remains

Notes:

1. All units are milligrams per kilogram (mg/kg).
2. Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082A by TestAmerica Laboratory of Amherst, New York.
3. A "<" or "ND" indicates the parameter was not detected above the reporting limit.
4. Results in **bold** print indicate positively/tentatively identified compounds.
5. Dark shaded result are for total PCBs that are equal to or above the cleanup objective of 1 mg/kg for soil at or less than 1 foot below ground surface (ft bgs).

5a. Light shaded result are for total PCBs that are equal to or above the cleanup objective of 10 mg/kg for soil at or greater than 1 ft bgs.

6. Soil remains in place despite exceeding cleanup objective due to proximity to site structure.
7. A "J" qualifier indicates that the analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.
8. The "NJ" qualifier indicates that the compound has been "tentatively identified" and the associated numerical value is the approximate concentration of the analyte in the sample.

TABLE 5
RINSE BLANK DATA
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID Property PCBs/Sampling Date	20150901-RB-1 GE 9/1/15	20150909-RB-1 GE 9/9/15	20150923-RB-1 DKP 9/23/15	20150930-RB-1 GE 9/30/15	20151006-RB-1 DKP 10/6/15	20151009-RB-1 GE 10/9/15	20151013-RB-1 GE 10/13/15	20151015-RB-1 DKP 10/15/15
Aroclor 1016	<0.47	<0.47	<0.48	<0.47	<0.47	<0.46	<0.47	<0.49
Aroclor 1221	<0.47	<0.47	<0.48	<0.47	<0.47	<0.46	<0.47	<0.49
Aroclor 1232	<0.47	<0.47	<0.48	<0.47	<0.47	<0.46	<0.47	<0.49
Aroclor 1242	<0.47	<0.47	<0.48	<0.47	<0.47	<0.46	<0.47	<0.49
Aroclor 1248	<0.47	<0.47	<0.48	<0.47	<0.47	<0.46	<0.47	<0.49
Aroclor 1254	<0.47	<0.47	<0.48	<0.47	<0.47	<0.46	<0.47	<0.49
Aroclor 1260	<0.47	<0.47	<0.48	<0.47	<0.47	<0.46	<0.47	<0.49
Total PCBs	ND	ND	ND	ND	ND	ND	ND	ND

Notes:
1. All units are micrograms per liter (µg/L).
2. Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082A by TestAmerica Laboratory of Amherst, New York.
3. A "<" or "ND" indicates the parameter was not detected above the reporting limit.

TABLE 6
SUMMARY OF POST REMEDIATION SOIL QUALITY
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID	Sample Date	Property	Sample Type	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
CS-1 (SIDEWALL 0.5)	8/20/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND
CS-2 (BOTTOM 1.0)	8/20/2015	DKP	Base of excavation	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND
CS-3 (SIDEWALL 0.5')	8/20/2015	GE	Sidewall, edge of pavement	<0.29	<0.29	<0.29	<0.29	<0.29	**1.1 J**	**1.9**	**3.0[6] J**
CS-4 (SIDEWALL 0.5')	8/21/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND
CS-5 (BOTTOM 1.0')	8/21/2015	DKP	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND
CS-6 (SIDEWALL 0.5')	8/21/2015	GE	Sidewall, edge of pavement	<1.4	<1.4	<1.4	<1.4	**1.5 NJ**	<1.4	**11**	**12.5[6] NJ**
CS-8 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	**0.19 J**	**0.19 J**
CS-9A (SIDEWALL 2.0')	9/25/2015	GE	Deeper Sidewall	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND
CS-10 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND
CS-11 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND
CS-12 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	ND
CS-13 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.12 J**	**0.12 J**
CS-14 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	**0.18 J**	**0.18 J**
CS-15 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND
CS-16 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	ND
CS-17 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND
CS-18 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	**0.45**	**0.45**
CS-19 (BOTTOM 1.0')	9/1/2015	Lamar	Base of excavation	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	**0.88**	**0.88**
20150901-FD-1	9/1/2015	Lamar	Field Duplicate (CS-19)	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	**0.53**	**0.53**
CS-20 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	**0.24**	**0.24**
CS-21 (SIDEWALL 0.5')	9/1/2015	Lamar	Sidewall	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	**0.17 NJ**	**0.17 NJ**
CS-22 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND
CS-23 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND
CS-24A (BOTTOM 1.5')	9/25/2015	GE	Deeper Base	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND
CS-25A (BOTTOM 1.5')	9/25/2015	GE	Deeper Base	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND
CS-26 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**0.57**	**0.57**
CS-27 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	**0.56**	**0.56**
CS-28 (BOTTOM 1.0')	9/1/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	**0.43**	**0.43**
CS-29 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	**0.91**	**0.91**
CS-30 (SIDEWALL 0.5')	9/1/2015	GE	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	**0.96**	**0.96**
CS-31A (BOTTOM 1.5')	9/10/2015	DKP	Base of excavation	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND
CS-33 (BOTTOM 1.0')	9/4/2015	GE	Base of excavation	<0.24	<0.24	<0.24	<0.24	<0.24	**0.22 J**	**0.21 J**	**0.43 J**
CS-34 (BOTTOM 1.0')	9/4/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND
CS-35 (BOTTOM 1.0')	9/4/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND
CS-36 (BOTTOM 1.0')	9/9/2015	GE	Base of excavation	<0.19	<0.19	<0.19	<0.19	<0.19	<0.19	**0.32**	**0.32**
CS-37 (BOTTOM 1.0')	9/9/2015	GE	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	**0.12 NJ**	**0.12 NJ**
20150909-FD-1	9/9/2015	GE	Field Duplicate (CS-37)	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	**0.21 J**	**0.21 J**
CS-38 (BOTTOM 1.0')	9/9/2015	GE	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND
CS-39 (BOTTOM 1.0')	9/9/2015	GE	Base of excavation	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND
CS-40 (BOTTOM 1.0')	9/9/2015	DKP	Base of excavation	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	**0.21 J**	**0.21 J**
CS-41 (BOTTOM 1.0')	9/9/2015	DKP	Base of excavation	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	**0.45**	**0.45**
CS-42 (BOTTOM 1.0')	9/9/2015	DKP	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	**0.17 J**	**0.17 J**
CS-43 (SIDEWALL 0.5')	9/9/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	**0.29**	**0.29**
CS-44 (SIDEWALL 0.5')	9/9/2015	DKP	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.12 NJ**	**0.12 NJ**
CS-45 (SIDEWALL 0.5')	9/9/2015	DKP	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	**0.47**	**0.47**
CS-46 (SIDEWALL 0.5')	9/10/2015	DKP	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND
CS-47 (SIDEWALL 0.5')	9/10/2015	DKP	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**0.29**	**0.29**
CS-48 (SIDEWALL 1.0')	9/10/2015	GE	Sidewall	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND
CS-49 (SIDEWALL 1.0')	9/10/2015	GE	Sidewall	<0.34	<0.34	<0.34	<0.34	<0.34	<0.34	<0.34	ND
CS-50 (BOTTOM 1.0')	9/10/2015	GE	Base of excavation	<0.32	<0.32	<0.32	<0.32	<0.32	<0.32	<0.32	ND
CS-51 (BOTTOM 1.0')	9/10/2015	GE	Base of excavation	<0.26	<0.26	<0.26	<0.26	**0.086 NJ**	**0.16 J**	<0.26	**0.25 NJ**
CS-52 (BOTTOM 5.0')	9/18/2015	GE	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	**0.13 J**	**0.13 J**

TABLE 6
SUMMARY OF POST REMEDIATION SOIL QUALITY
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID	Sample Date	Property	Sample Type	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
CS-53 (BOTTOM 5.0')	9/18/2015	GE	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND
CS-54 (BOTTOM 5.5')	9/18/2015	GE	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND
CS-55 (BOTTOM 5.5')	9/23/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	**0.30**	**0.16 J**	**0.46 J**
CS-56 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND
CS-57 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	<0.29	<0.29	<0.29	**0.36**	<0.29	<0.29	**0.33**	**0.69**
CS-58 (BOTTOM 1.0')	9/23/2015	GE	Base of excavation	<0.22	<0.22	<0.22	**0.23**	<0.22	<0.22	**0.33**	**0.56**
CS-59A (BOTTOM 1.5')	9/30/2015	GE	Deeper Base	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND
CS-60 (SIDEWALL 0.5')	9/23/2015	DKP	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	**0.17 J**	**0.17 J**
CS-61 (SIDEWALL 0.5')	9/23/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	**0.34**	**0.47 J**	**0.81 J**
20150923-FD-1	9/23/2015	DKP	Field Duplicate (CS-61)	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	**0.40 J**	**0.40 J**
CS-62A (BOTTOM 1.5')	9/30/2015	GE	Deeper Base	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND
CS-63A (BOTTOM 1.5')	9/30/2015	DKP	Deeper Base	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND
CS-64 (SIDEWALL 0.5')	9/23/2015	DKP	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.26 J**	**0.26 J**
CS-65A (BOTTOM 1.5')	9/25/2015	GE	Deeper Base	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND
CS-66 (SIDEWALL 1.0')	9/23/2015	GE	Sidewall	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND
CS-90 (SIDEWALL 0.5')	9/30/2015	DKP	Sidewall	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND
CS-69 (SIDEWALL 1.5')	9/24/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND
CS-102 (SIDEWALL 2.5')	10/2/2015	GE	Sidewall (step out for CS-71)	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND
CS-117 (SIDEWALL 1.5')	10/7/2015	GE	Sidewall (step out for CS-72)	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	**0.11 J**	**0.11 J**
CS-73 (SIDEWALL 0.5')	9/24/2015	GE	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND
CS-74 (SIDEWALL 0.5')	9/24/2015	GE	Sidewall	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	ND
CS-75 (BOTTOM 1.0')	9/24/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	**0.15 J**	**0.15 J**
CS-76 (BOTTOM 1.0')	9/28/2015	DOT	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**0.41**	**0.41**
CS-77 (BOTTOM 1.0')	9/28/2015	DOT	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND
CS-78 (BOTTOM 1.0')	9/25/2015	DOT	Base of excavation	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND
CS-80 (SIDEWALL 0.5')	9/25/2015	DOT	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.29**	**0.29**
CS-81 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND
CS-82 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.38**	**0.38**
CS-83 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.42**	**0.42**
CS-84 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	**0.49**	**0.49**
CS-85 (SIDEWALL 0.5')	9/28/2015	DOT	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	**0.29 J**	**0.29 J**
CS-86 (SIDEWALL 5.0')	9/28/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**0.40**	**0.40**
20150928-FD-1	9/28/2015	GE	Field Duplicate (CS-86)	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND
CS-103 (SIDEWALL 5.0')	10/2/2015	GE	Sidewall (step out for CS-87)	**0.044 NJ**	<0.22	<0.22	<0.22	<0.22	<0.22	**1.2**	**1.2 NJ**
CS-88 (SIDEWALL 5.5')	9/28/2015	GE	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	ND
CS-89 (SIDEWALL 5.0')	9/28/2015	GE	Sidewall	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	ND
CS-91 (SIDEWALL 5.5')	10/1/2015	GE	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND
CS-92 (SIDEWALL 1.5')	10/1/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND
CS-93 (SIDEWALL 1.5')	10/1/2015	GE	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND
CS-94 (SIDEWALL 1.5')	10/1/2015	GE	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND
CS-95 (SIDEWALL 1.5')	10/1/2015	GE	Sidewall	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	ND
CS-96 (SIDEWALL 12.0')	10/1/2015	GE	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	ND
CS-97 (BOTTOM 12.0')	10/1/2015	GE	Base of excavation	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	ND
CS-98 (SIDEWALL 12.0')	10/1/2015	GE	Sidewall	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND
CS-99 (SIDEWALL 12.0')	10/1/2015	GE	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND
CS-100 (SIDEWALL 12.0')	10/1/2015	GE	Sidewall	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND
CS-101 (SIDEWALL 5.0')	10/1/2015	GE	Sidewall	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND
CS-104 (BOTTOM 1.5')	10/6/2015	GE	Base of excavation	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	ND
CS-105 (BOTTOM 1.5')	10/6/2015	DKP	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND
20151006-FD-1	10/6/2015	DKP	Field Duplicate (CS-105)	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	ND
CS-106A (SIDEWALL 0.5')	10/12/2015	DKP	Base of excavation	<0.30	<0.30	<0.30	<0.30	<0.30	<0.30	**0.60**	**0.60**
CS-107 (BOTTOM 1.5')	10/6/2015	GE	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND

TABLE 6
SUMMARY OF POST REMEDIATION SOIL QUALITY
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID	Sample Date	Property	Sample Type	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
CS-108 (SIDEWALL 0.5')	10/6/2015	DKP	Sidewall	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	**0.13 J**	**0.13 J**
CS-109B (SIDEWALL 3.0')	10/16/2015	GE	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND
CS-110 (BOTTOM 1.5')	10/6/2015	GE	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND
CS-111 (BOTTOM 1.5')	10/6/2015	DKP	Base of excavation	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND
CS-112 (SIDEWALL 0.5')	10/6/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND
CS-113 (BOTTOM 1.5')	10/6/2015	GE	Base of excavation	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND
CS-114 (SIDEWALL 2.0')	10/6/2015	GE	Sidewall	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.20 J**	**0.20 J**
CS-115 (SIDEWALL 2.0')	10/6/2015	GE	Sidewall	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND
CS-116 (SIDEWALL 0.5')	10/6/2015	DOT	Sidewall	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	**0.25 J**	**0.25 J**
CS-118A (SIDEWALL 4.0')	10/12/2015	GE	Sidewall	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	**0.39**	**0.39**
CS-119A (BOTTOM 3.0')	10/12/2015	GE	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**0.14 NJ**	**0.14 NJ**
CS-120 (BOTTOM 1.0')	10/9/2015	GE	Base of excavation	<0.25	<0.25	<0.25	<0.25	<0.25	<0.25	**0.14 J**	**0.14 J**
20151009-FD-1	10/9/2015	GE	Field Duplicate (CS-120)	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND
CS-121 (BOTTOM 1.5')	10/9/2015	GE	Base of excavation	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND
CS-122 (SIDEWALL 0.5')	10/9/2015	DKP	Sidewall	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND
CS-123 (BOTTOM 1.0')	10/9/2015	DKP	Base of excavation	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND
CS-124 (SIDEWALL 0.5')	10/9/2015	DKP	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	ND
CS-125 (SIDEWALL 0.5')	10/9/2015	DKP	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	ND
CS-127 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND
CS-128 (BOTTOM 2.0')	10/13/2015	GE	Base of excavation	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND
CS-129 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND
CS-130 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	ND
CS-131 (BOTTOM 1.0')	10/13/2015	DKP	Base of excavation	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND
20151013-FD-1	10/13/2015	DKP	Field Duplicate (CS-131)	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	<0.24	ND
CS-141 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall (step out for CS-132)	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND
CS-133 (SIDEWALL 0.5')	10/13/2015	DKP	Sidewall	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	<0.21	ND
CS-134 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	<0.26	**0.87**	**0.87**
CS-135 (SIDEWALL 0.5')	10/13/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	**0.30**	**0.22 J**	**0.52 J**
CS-147 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall (step out for CS-136)	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	<0.23	ND
CS-149 (SIDEWALL 0.5')	10/21/2015	DKP	Sidewall (step out for CS-148)	<0.26	<0.26	<0.26	<0.26	<0.26	**0.41**	<0.26	**0.41**
CS-138 (SIDEWALL 0.5')	10/13/2015	GE	Sidewall	<0.26	<0.26	<0.26	<0.26	<0.26	**0.34**	**0.20 J**	**0.54 J**
CS-139 (BOTTOM 1.0')	10/13/2015	DKP	Base of excavation	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	<0.20	ND
CS-140 (SIDEWALL 0.8')	10/15/2015	DKP	Sidewall	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	<0.28	ND
CS-143 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND
20151015-FD-1	10/15/2015	DKP	Field Duplicate (CS-143)	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	<0.22	ND
CS-144 (BOTTOM 1.0')	10/15/2015	DKP	Base of excavation	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	<0.29	ND
CS-145 (SIDEWALL 0.5')	10/15/2015	DKP	Sidewall	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	<0.27	ND
CS-146 (SIDEWALL 0.5')	10/15/2015	GE	Sidewall	<0.29	<0.29	<0.29	<0.29	**0.19 J**	<0.29	**2.7**	**2.9[6] J**

Notes:

1. All units are milligrams per kilogram (mg/kg).
2. Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082A by TestAmerica Laboratory of Amherst, New York.
3. A "<" or "ND" indicates the parameter was not detected above the reporting limit.
4. Results in **bold** print indicate positively/tentatively identified compounds.
5. Dark shaded result are for total PCBs that are equal to or above the cleanup objective of 1 mg/kg for soil at or less than 1 foot below ground surface (ft bgs).

5a. Light shaded result are for total PCBs that are equal to or above the cleanup objective of 10 mg/kg for soil at or greater than 1 ft bgs.

6. Soil remains in place despite exceeding cleanup objective due to proximity to site structure.
7. A "J" qualifier indicates that the analyte was positively identified; the associated numerical value is the approximate concentration of the analyte in the sample.
8. The "NJ" qualifier indicates that the compound has been "tentatively identified" and the associated numerical value is the approximate concentration of the analyte in the sample.

TABLE 7
SUMMARY OF STORM SEWER CLEANING ACTIVITIES
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

From	To	Map Distance (ft)	Cleaning Distance (ft)	Video Distance (ft)	Comments
On-Site Storm Sewer Manholes/Catch Basins					
STMH-1	STMH-2	72	72	72	
STMH-1	CB-1	145	145	4	A mis-aligned pipe at 4' prevented further video.
STMH-1	CB-2	6	6	6	
STMH-1	CB-3	118	85	10	Unknown obstruction (85') prevented full cleaning and concrete intrusion at joints (4') prevented further video.
STMH-1	Milens Rd	125	84	83	A custom formed directional pipe change limited video.
STMH-2	STMH-3	138	138	138	
STMH-3	North	305	305	(Note 1)	A portion of the original storm sewer pipe was replaced during the CMI. Northern section obstructed by roofing stone.
1J	8" Storm Sewer	15	15	4	A 90 degree bend prevented further video.
2J	1J	60	60	17.5	A P-trap prevented further video.
On-Site Trench Drains and Floor Drains					
Interior Rail Bay Trench Drain	-	-	45	-	Shoveled out debris, then flushed with water. Sump and connecting pipe also flushed. Removed and reconstructed trench drain.
Exterior Concrete Ramp Trench Drain	-	-	12	-	Removed sediment and debris, then flushed with water.
Interior Depressed Dock Floor Drain	-	-	9	-	Flushed drain, associated sump, and connecting piping with water.
Interior At-Grade Trench Drain	-	-	14	-	Removed sediment and debris, then flushed with water. Removed trench drain and restored floor slab.
Milens Road Storm Sewer Manholes					
MH-1	DKP	370	393	30	Broken pipe prevented further video. Distance to break uncertain as footage counter was influenced by the repeated attempts to get up the line.
MH-1	North	145	168	11	Large debris in pipe (concrete) at 11' prevented further video.
MH-1	MH-2	150	-	15	Concrete obstruction in pipe prevented further video.
MH-2	MH-1	150	150	32	Protruding concrete at joint prevented further video.
MH-2	MH-3	430	-	0	Concrete obstruction at manhole prevented video.
MH-3	MH-2	430	430	134	Concrete on bottom of pipe prevented further video.
MH-3	MH-4	450	-	1.5	Bottom contour of pipe prevented further video.
MH-4	MH-3	450	450	138	Large debris in pipe prevented further video.

Notes:
1. Video of the 8-inch storm line was obtained from STMH-3 to 168' north, and from 217' north to 305'.
2. "STMH" indicates on-site storm sewer manhole.
3. "CB" indicates on-site catch basin.
4. "MH" indicates off-site manhole.
5. "2J" and "1J" reference shop columns.

TABLE 8
TREATED WASTE WATER ANALYTICAL RESULTS AND VOLUME DISCHARGED
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID **Parameter/Sampling Date**	**W001** **10/6/2015**	**W002** **10/20/2015**	**W003** **10/26/2015**	**W004** **11/3/2015**	**W005** **11/11/2015**
Aroclor 1016	<0.057	<0.057	<0.063	<0.50	<0.057
Aroclor 1221	<0.057	<0.057	<0.063	<0.50	<0.057
Aroclor 1232	<0.057	<0.057	<0.063	<0.50	<0.057
Aroclor 1242	<0.057	<0.057	<0.063	<0.50	<0.057
Aroclor 1248	<0.057	<0.057	<0.063	<0.50	<0.057
Aroclor 1254	<0.057	**0.15**	<0.063	<0.50	<0.057
Aroclor 1260	**0.060**	**0.14**	**0.088**	<0.50	<0.057
Batch # and Fate[3]	Batch #1 met criteria; discharged	Batch #2 failed criteria, retreated	Batch #2 failed criteria, retreated	Batch #2 met criteria, discharged	Batch #3 met criteria, discharged

Gallons of Treated Wastewater Discharged		
Batch Number	**Associated Samples**	**Gallons Discharged**
1	W001	10,105
2	W002, W003, W004	18,974
3	W005	1,000
Total Project Discharge Volume (gallons)		**30,079**

Notes:
1. All units are micrograms per liter (µg/L).
2. Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 608 or 8082A by TestAmerica Laboratory of Amherst, NY.
3. The allowable discharge limit per the Industrial Sewer Connection Permit authorized by the Town of Tonawanda is 0.065 µg/L.
4. A "<" indicates the parameter was not detected above the reporting limit.
5. Results in **bold** print indicate positively identified compounds.

TABLE 9
SUMMARY OF PCB RESULTS FOR WWTP WASTE MANAGEMENT
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID	**TANK 1-SED (mg/kg)**	**TANK 2-SED (mg/kg)**	**20151019 WASTEWATER (µg/L)**
Parameter	**10/22/2015**	**10/22/2015**	**10/19/15**
Aroclor 1016	<0.98	<2.5	<0.47
Aroclor 1221	<0.98	<2.5	<0.47
Aroclor 1232	<0.98	<2.5	<0.47
Aroclor 1242	<0.98	<2.5	<0.47
Aroclor 1248	<0.98	<2.5	<0.47
Aroclor 1254	<0.98	**17**	**1.3**
Aroclor 1260	**10**	**5.4**	**0.96**

Notes:
1. Units are as noted; milligrams per kilogram (mg/kg), micrograms per liter (µg/L).
2. Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082A by TestAmerica Laboratory of Amherst, NY.
3. A "<" indicates the parameter was not detected above the reporting limits.
4. Results in **bold** print indicate positively identified compounds.

TABLE 10
ANALYTICAL RESULTS FOR EQUIPMENT WIPE SAMPLES
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID & (Equipment Description)	Sample Date	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
254297 PASS SIDE 7' UP (Frac #1)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
254297 BACK WALL 5' UP (Frac #1)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
254297 FRONT WALL 3' UP (Frac #1)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
254297 DRIVER WALL 4' UP (Frac #1)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
254297 FLOOR AT "V" (Frac #1)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
29735 PASS SIDE 7' UP (Frac #2)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
29735 BACK WALL 5' UP (Frac #2)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
29735 FRONT WALL 3' UP (Frac #2)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
29735 DRIVER WALL 4' UP (Frac #2)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
29735 FLOOR AT "V" (Frac #2)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
251180 DRIVER WALL 4' UP (Frac #3)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
251180 FRONT WALL 3' UP (Frac #3)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
251180 BACK WALL 5' UP (Frac #3)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
251180 PASS WALL 7' UP (Frac #3)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
251180 FLOOR AT "V" (Frac #3)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
POT 260380 (Bag Filter Housing)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
POT 260385 (Bag Filter Housing)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
ID 4166 SIDE (Vacuum Truck)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
ID 4166 BOTTOM (Vacuum Truck)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
ID CH1018 FRONT TANK TOP (WWTP)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
ID CH1018 BACK TANK TOP (WWTP)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
ID CH1018 FILTER TOWER (WWTP)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
ID CH1018 FRONT TANK BOTTOM (WWTP)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0
ID CH1018 BACK TANK BOTTOM (WWTP)	11/21/2015	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0	<1.0

Notes:
1. All units are micrograms per wipe (µg/Wipe).
2. Samples analyzed for polychlorinated biphenyls (PCBs) by EPA Method 8082A by TestAmerica Laboratory of Amherst, NY.
3. A "<" indicates the parameter was not detected above the reporting limit.
4. "WWTP" indicates waste water treatment plant.

TABLE 11
WASTE CHARACTERIZATION ANALYTICAL RESULTS
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID Parameter/Sampling Date	WC-N. FENCE 8/5/15	WC-PILE 8/5/15	WC-RWTP-SURFACE 8/5/15	WC-S. FENCE 8/5/15	RWT EXC 8.0' 9/24/2015	RWT EXC 10.5' 9/24/2015	CS-70 (SIDEWALL 1.5') TCLP 9/30/2015	WC - CONCRETE SOUTH 11/9/15	WC - CONCRETE NORTHEAST 11/11/15	WC - ROLLOFF 11/24/15
Polychlorinated Biphenyls (PCBs) by EPA Method 8082A in mg/kg										
Aroclor 1016	<0.22	<5.3	<4.0	<5.2	<0.21	<0.24	NA	<0.17	<1.0	<0.51
Aroclor 1221	<0.22	<5.3	<4.0	<5.2	<0.21	<0.24	NA	<0.17	<1.0	<0.51
Aroclor 1232	<0.22	**4.3 J**	<4.0	<5.2	<0.21	<0.24	NA	<0.17	<1.0	<0.51
Aroclor 1242	<0.22	**4.6 J**	<4.0	<5.2	**0.19 J**	<0.24	NA	<0.17	<1.0	<0.51
Aroclor 1248	<0.22	<5.3	<4.0	<5.2	<0.21	<0.24	NA	<0.17	<1.0	**0.96**
Aroclor 1254	<0.22	**46**	<4.0	<5.2	<0.21	<0.24	NA	<0.17	<1.0	<0.51
Aroclor 1260	**1.2**	**57**	**44**	**22**	**1.3**	**0.13 J**	NA	**0.36**	**8.9**	**2.0**
Volatile Organic Compounds by EPA Method 8260C in mg/L - TCLP										
1,2-Dichloroethane	<0.010	<0.010	<0.010	<0.010	NA	NA	NA	NA	NA	<0.010
2-Butanone (MEK)	<0.050	<0.050	<0.050	<0.050	NA	NA	NA	NA	NA	<0.050
Benzene	<0.010	<0.010	<0.010	<0.010	NA	NA	NA	NA	NA	<0.010
Carbon Tetrachloride	<0.010	<0.010	<0.010	<0.010	NA	NA	NA	NA	NA	<0.010
Chlorobenzene	<0.010	<0.010	<0.010	<0.010	NA	NA	NA	NA	NA	<0.010
Chloroform	<0.010	<0.010	<0.010	<0.010	NA	NA	NA	NA	NA	<0.010
Tetrachloroethene	<0.010	<0.010	<0.010	<0.010	NA	NA	NA	NA	NA	<0.010
Trichloroethene	<0.010	<0.010	<0.010	<0.010	NA	NA	NA	NA	NA	<0.010
Vinyl Chloride	<0.010	<0.010	<0.010	<0.010	NA	NA	NA	NA	NA	<0.010
1,1-Dichloroethene	<0.010	<0.010	<0.010	<0.010	NA	NA	NA	NA	NA	<0.010
Metals by EPA Method 6010C/7470A in mg/L - TCLP										
Arsenic	<0.015	<0.015	**0.0085 J**	<0.015	NA	NA	<0.0056	NA	NA	NA
Barium	**0.96 J**	**0.39 J**	**0.11 J**	**0.75 J**	NA	NA	**0.93 J**	NA	NA	NA
Cadmium	**0.014**	**0.0064**	**0.0026**	**0.0033**	NA	NA	**0.0086**	NA	NA	NA
Chromium	<0.020	<0.020	<0.020	<0.020	NA	NA	<0.010	NA	NA	NA
Lead	**0.029**	**0.0058 J**	**0.0076 J**	**0.0051 J**	NA	NA	**0.019 J**	NA	NA	NA
Mercury	<0.00020	<0.00020	<0.00020	<0.00020	NA	NA	<0.00020	NA	NA	NA
Selenium	<0.025	<0.025	<0.025	<0.025	NA	NA	<0.0087	NA	NA	NA
Silver	<0.0060	<0.0060	<0.0060	<0.0060	NA	NA	<0.0017	NA	NA	NA

Notes:
1. Units and analytical methods are as noted; milligrams per kilogram (mg/kg), milligrams per liter (mg/L). Samples analyzed by TestAmerica of Amherst, NY.
2. "TCLP", toxicity characteristic leaching procedure, is a soil sample extraction method which simulates leaching.
3. A "J" indicates an estimated value less than the reporting limit but greater than or equal to the method detection limit.
4. A "<" indicates the parameter was not detected above the reporting limits.
5. Results in **bold** print indicate positively/tentatively identified compounds.
6. "NA" indicates parameter was not analyzed in the sample.

TABLE 12
HAZARDOUS WASTE SHIPMENT SUMMARY
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Date	Manifest #	Weighed Quantity (kg)
8/25/2015	002921994 GBF	28,087
8/25/2015	002921995 GBF	29,692
8/25/2015	002922056 GBF	27,207
8/25/2015	002922057 GBF	31,062
8/25/2015	002922058 GBF	27,778
8/26/2015	002922059 GBF	30,554
8/26/2015	002922060 GBF	30,718
8/25/2015	002922061 GBF	29,148
8/26/2015	002922062 GBF	28,259
8/26/2015	002922063 GBF	28,123
8/26/2015	002922064 GBF	30,699
8/26/2015	002922065 GBF	28,731
8/26/2015	002922066 GBF	34,210
8/26/2015	002922067 GBF	29,330
8/31/2015	002922068 GBF	28,277
8/31/2015	002922069 GBF	27,688
9/1/2015	002922070 GBF	29,974
9/1/2015	002922071 GBF	21,346
9/1/2015	002922072 GBF	29,021
9/1/2015	002922073 GBF	27,243
9/2/2015	002922074 GBF	29,529
9/2/2015	002922075 GBF	25,920
9/2/2015	002922076 GBF	28,441
9/2/2015	002922077 GBF	28,531
9/3/2015	002922078 GBF	29,901
9/3/2015	002922079 GBF	29,992
9/8/2015	002922080 GBF	28,050
9/8/2015	002922081 GBF	28,341
9/9/2015	002922082 GBF	26,481
9/9/2015	002922083 GBF	26,300
9/9/2015	002922084 GBF	24,349
9/9/2015	002922085 GBF	25,247
9/10/2015	002922086 GBF	29,720
9/10/2015	002922087 GBF	27,833
9/10/2015	002922088 GBF	27,688
9/10/2015	002922089 GBF	28,168
9/16/2015	002922091 GBF	26,699
9/16/2015	002922092 GBF	28,522
9/17/2015	002922093 GBF	28,196
9/17/2015	002922100 GBF	28,295
9/22/2015	002922090 GBF	29,711
9/22/2015	002922094 GBF	27,824
9/22/2015	002922095 GBF	29,547
9/22/2015	002922096 GBF	29,774
9/22/2015	002922097 GBF	28,323
9/22/2015	002922098 GBF	28,894
9/23/2015	002922099 GBF	28,413
9/23/2015	002922101 GBF	30,083
9/23/2015	002922102 GBF	27,914
9/23/2015	002922103 GBF	29,983
9/23/2015	002921918 GBF	31,244
9/23/2015	002921919 GBF	29,239
9/24/2015	002921920 GBF	30,237
9/24/2015	002921921 GBF	31,861
9/24/2015	002921922 GBF	28,513
9/24/2015	002921923 GBF	29,003
9/24/2015	002921926 GBF	30,291
9/24/2015	002921927 GBF	28,377
9/28/2015	002921924 GBF	29,066

TABLE 12
HAZARDOUS WASTE SHIPMENT SUMMARY
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Date	Manifest #	Weighed Quantity (kg)
9/28/2015	002921925 GBF	27,642
9/28/2015	002921940 GBF	30,572
9/29/2015	002921941 GBF	27,824
9/29/2015	002921942 GBF	28,023
9/29/2015	002921943 GBF	15,150
10/9/2015	002921944 GBF	13,989
10/12/2015	002921945 GBF	10,841
10/14/2015	002921946 GBF	9,861
10/14/2015	002921947 GBF	13,699
11/2/2015	002921948 GBF	12,728
	Total (kg)	**1,881,976**
	Total (tons)	**2,075**

Note:
1. Hazardous waste was disposed of at CWM Chemical Services, L.L.C. located in Model City, New York.
2. Units are as noted; kilograms (kg), tons.

TABLE 13
NON-HAZARDOUS WASTE SHIPMENT SUMMARY
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Date	Manifest or Bill of Lading #	Weighed Quantity (Tons)
8/21/2015	WMNA 4242426	36.58
8/26/2015	WMNA 4242427	33.82
8/26/2015	WMNA 4242428	34.35
8/26/2015	WMNA 4242430	33.80
8/27/2018	WMNA 4242431	31.39
8/27/2015	WMNA 4242432	33.37
8/28/2015	WMNA 4242433	38.96
8/28/2015	WMNA 4242434	37.22
8/31/2015	WMNA 4242435	37.85
8/31/2015	WMNA 4242429	38.4
9/1/2015	WMNA 4242436	38.08
9/2/2015	WMNA 4242437	34.50
9/2/2015	WMNA 4242438	39.62
9/2/2015	WMNA 4242439	36.76
9/2/2015	WMNA 4242440	37.04
9/3/2015	WMNA 4242441	39.83
9/3/2015	WMNA 4242442	38.96
9/3/2015	WMNA 4242443	34.75
9/3/2015	WMNA 4242444	38.67
9/3/2015	WMNA 4242445	36.73
9/3/2015	WMNA 4242446	38.64
9/4/2015	WMNA 4242468	38.05
9/4/2015	WMNA 4242470	40.04
9/4/2015	WMNA 4242471	39.55
9/4/2015	WMNA 4242447	37.94
9/4/2015	WMNA 4242448	38.11
9/4/2015	WMNA 4242449	40.08
9/8/2015	WMNA 4242450	39.58
9/8/2015	WMNA 4242451	39.83
9/10/2015	WMNA 4242452	39.54
9/10/2015	WMNA 4242453	38.00
9/10/2015	WMNA 4242454	38.21
9/10/2015	WMNA 4242455	35.74
9/10/2015	WMNA 4242456	36.65
9/10/2015	WMNA 4242457	38.57
9/11/2015	WMNA 4242458	35.57
9/11/2015	WMNA 4242459	38.80
9/11/2015	WMNA 4242460	38.23
9/11/2015	WMNA 4242461	38.70
9/11/2015	WMNA 4242462	38.24
9/11/2015	WMNA 4242463	39.64
9/14/2015	WMNA 4242464	36.51
9/14/2015	WMNA 4242465	38.64
9/21/2015	WMNA 4242466	39.11
9/30/2015	WMNA 4242467	37.00
9/30/2015	WMNA 4242469	38.04
9/30/2015	WMNA 4242475	37.43
9/30/2015	WMNA 4242476	37.19
10/1/2015	WMNA 4242477	39.14
10/1/2015	WMNA 4242478	38.88
10/1/2015	WMNA 4242479	38.46
10/1/2015	WMNA 4242482	39.94
10/1/2015	WMNA 4242481	40.54
10/1/2015	WMNA 4242480	38.33
10/2/2015	WMNA 4242483	38.81

TABLE 13
NON-HAZARDOUS WASTE SHIPMENT SUMMARY
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Date	Manifest or Bill of Lading #	Weighed Quantity (Tons)
10/2/2015	WMNA 4242484	38.65
10/2/2015	WMNA 4242485	39.57
10/2/2015	WMNA 4242486	40.90
10/2/2015	WMNA 4242487	41.99
10/5/2015	WMNA 4242473	40.24
10/5/2015	WMNA 4242472	38.13
10/5/2015	WMNA 4242474	37.93
10/5/2015	WMNA 4242502	38.18
10/6/2015	WMNA 4242488	39.47
10/6/2015	WMNA 4242489	38.32
10/6/2015	WMNA 4242490	36.81
10/6/2015	WMNA 4242491	39.76
10/7/2015	WMNA 4242503	35.02
10/7/2015	WMNA 4242492	37.92
10/7/2015	WMNA 4242493	36.12
10/7/2015	WMNA 4242494	39.25
10/8/2015	WMNA 4242495	39.19
10/8/2015	WMNA 4242496	39.04
10/8/2015	WMNA 4242497	38.89
10/9/2015	WMNA 4242498	37.72
10/9/2015	WMNA 4242499	38.31
10/12/2015	WMNA 4242500	40.52
10/12/2015	WMNA 4242501	32.46
10/15/2015	WMNA 4242504	39.09
10/15/2015	WMNA 4242505	38.87
10/19/2015	WMNA 4242506	38.20
10/20/2015	WMNA 4242507	39.41
10/23/2015	WMNA 4242508	36.69
11/18/2015	WMNA 4242509	40.27
11/18/2015	WMNA 4242510	44.42
11/18/2015	WMNA 4242511	39.74
11/18/2015	WMNA 4242512	39.00
11/19/2015	WMNA 4242513	36.77
11/19/2015	WMNA 4242514	38.88
11/19/2015	WMNA 4242515	39.76
11/19/2015	WMNA 4242516	40.13
11/20/2015	WMNA 4242517	40.08
11/20/2015	WMNA 4242518	37.63
11/20/2015	WMNA 4242519	37.49
11/20/2015	WMNA 4242520	39.80
11/20/2015	WMNA 4242521	41.26
11/20/2015	WMNA 4242522	44.71
11/24/2015	WMNA 4242523	5.83
12/23/2015	WMNA 4242525	17.88
1/21/2016	872444	14.01
1/22/2016[2]	1158369	4
2/12/2016[2]	872483	7
4/8/2016	WMNA 4242524	1.24
	Total (tons)	3,763

Note:
1. Non-hazardous waste was disposed of at High Acres Landfill located in Fairport, New York.
2. Weighed quantities are not available, values provided are estimates. These shipments were disposed of at Spring Grove Resource Recovery Inc. located in Cincinnati, Ohio.

TABLE 14
ANALYTICAL RESULTS FOR IMPORTED FILL
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID / Sample Date	NYSDEC Allowable Levels for Commercial or Industrial Use[1]	COMMON FILL 9/1/2015	TOPSOIL 9/1/2015	TYPE II 9/1/2015
Inorganics by EPA Method 6010C/7471B/9012B in mg/kg				
Arsenic	16	**2.7**	**4.3**	**4.2**
Barium	400	**77.7**	**75**	**37.7**
Beryllium	47	**0.26**	**0.66**	<0.21
Cadmium	7.5	**0.23**	**0.59**	**0.39**
Chromium, Hexavalent	19	<0.83	<10.2	<0.82
Chromium, Trivalent	1,500	**8**	**16.9**	**4.9**
Copper	270	**13.8**	**17.8**	<5.2
Cyanide	27	<1 *	<1.3 *	<1 *
Lead	450	**6.2**	**36.1**	**83.3**
Manganese	2,000	**394**	**403**	**439**
Mercury	0.73	<0.021	**0.083**	<0.02
Nickel	130	**11**	**16**	**5.7**
Selenium	4	<3.9	<5	<4.2
Silver	8.3	<0.59	<0.75	<0.62
Zinc	2,480	**37.1**	**139**	**98.1**
Pesticides by EPA Method 8081B in µg/kg				
Aldrin	190	<1.7	<2.1	<1.7
Alpha BHC (Alpha Hexachlorocyclohexane)	20	<1.7	<2.1	<1.7
Alpha Chlordane	2,900	<1.7	<2.1	<1.7
Alpha Endosulfan	102,000	<1.7	<2.1	<1.7
Beta BHC (Beta Hexachlorocyclohexane)	90	<1.7	<2.1	<1.7
Beta Endosulfan	102,000	<1.7	<2.1	<1.7
Delta BHC (Delta Hexachlorocyclohexane)	250	<1.7	<2.1	<1.7*
Dieldrin	100	<1.7	<2.1	<1.7
Endosulfan Sulfate	200,000	<1.7	<2.1	<1.7
Endrin	60	<1.7	<2.1	<1.7
Gamma BHC (Lindane)	100	<1.7	<2.1	<1.7
Heptachlor	380	<1.7	<2.1	<1.7
P,P'-DDD	14,000	<1.7	<2.1	<1.7
P,P'-DDE	17,000	<1.7	<2.1	<1.7
P,P'-DDT	47,000	<1.7	<2.1	<1.7
Silvex (2,4,5-TP)	3,800	<17	<21	<17
Polychlorinated Biphenyls (PCBs) by EPA Method 8082A in mg/kg				
PCB-1016 (Aroclor 1016)	NS	<0.19	<0.22	<0.18
PCB-1221 (Aroclor 1221)	NS	<0.19	<0.22	<0.18
PCB-1232 (Aroclor 1232)	NS	<0.19	<0.22	<0.18
PCB-1242 (Aroclor 1242)	NS	<0.19	<0.22	<0.18
PCB-1248 (Aroclor 1248)	NS	<0.19	<0.22	<0.18
PCB-1254 (Aroclor 1254)	NS	<0.19	<0.22	<0.18
PCB-1260 (Aroclor 1260)	NS	<0.19	<0.22	<0.18
Total PCBs	1	ND	ND	ND

TABLE 14
ANALYTICAL RESULTS FOR IMPORTED FILL
CORRECTIVE MEASURE IMPLMENTATION
GENERAL ELECTRIC INTERNATIONAL, INC.
TONAWANDA, NEW YORK

Sample ID / Sample Date	NYSDEC Allowable Levels for Commercial or Industrial Use[1]	COMMON FILL 9/1/2015	TOPSOIL 9/1/2015	TYPE II 9/1/2015
Volatile Organic Compounds by EPA Method 8260C in µg/kg				
1,1,1-Trichloroethane	680	<3.8	<5.3	<4
1,1-Dichloroethane	270	<3.8	<5.3	<4
1,1-Dichloroethene	330	<3.8	<5.3	<4
1,2,4-Trimethylbenzene	3,600	<3.8	<5.3	<4
1,2-Dichlorobenzene	1,100	<3.8	<5.3	<4
1,2-Dichloroethane	20	<3.8	<5.3	<4
1,3,5-Trimethylbenzene (Mesitylene)	8,400	<3.8	<5.3	<4
1,3-Dichlorobenzene	2,400	<3.8	<5.3	<4
1,4-Dichlorobenzene	1,800	<3.8	<5.3	<4
1,4-Dioxane (P-Dioxane)	100	<76	<110	<81
Acetone	50	<19	<26	<20
Benzene	60	<3.8	<5.3	<4
Carbon Tetrachloride	760	<3.8	<5.3	<4
Chlorobenzene	1,100	<3.8	<5.3	<4
Chloroform	370	<3.8	<5.3	<4
Cis-1,2-Dichloroethylene	250	<3.8	<5.3	<4
Ethylbenzene	1,000	<3.8	<5.3	<4
Methyl Ethyl Ketone (2-Butanone)	120	<19	<26	<20
Methylene Chloride	50	<3.8	<5.3	<4
N-Butylbenzene	12,000	<3.8	<5.3	<4
N-Propylbenzene	3,900	<3.8	<5.3	<4
Sec-Butylbenzene	11,000	<3.8	<5.3	<4
T-Butylbenzene	5,900	<3.8	<5.3	<4
Tert-Butyl Methyl Ether	930	<3.8	<5.3	<4
Tetrachloroethylene(PCE)	1,300	<3.8	<5.3	<4
Toluene	700	<3.8	<5.3	<4
Trans-1,2-Dichloroethene	190	<3.8	<5.3	<4
Trichloroethylene (TCE)	470	<3.8	<5.3	<4
Vinyl Chloride	20	<3.8	<5.3	<4
Xylenes, Total	1,600	<7.6	<11	<8.1
Semi-Volatile Organic Compounds by EPA Method 8270D in µg/kg				
2-Methylphenol (O-Cresol)	330	<170	<210	<170
3-Methylphenol	330	<340	<410	<330
4-Methylphenol (P-Cresol)	330	<340	<410	<330
Acenaphthene	98,000	<170	<210	<170
Acenaphthylene	107,000	<170	<210	<170
Anthracene	500,000	<170	<210	<170
Benzo(A)Anthracene	1,000	<170	<210	<170
Benzo(A)Pyrene	1,000	<170	<210	<170
Benzo(B)Fluoranthene	1,700	<170	<210	<170
Benzo(G,H,I)Perylene	500,000	<170	<210	<170
Benzo(K)Fluoranthene	1,700	<170	<210	<170
Chrysene	1,000	<170	<210	<170
Dibenz(A,H)Anthracene	560	<170	<210	<170
Dibenzofuran	210,000	<170	<210	<170
Fluoranthene	500,000	<170	<210	<170
Fluorene	386,000	<170	<210	<170
Hexachlorobenzene	3,200	<170	<210	<170
Indeno(1,2,3-C,D)Pyrene	5,600	<170	<210	<170
Naphthalene	12,000	<170	<210	<170
Pentachlorophenol	800	<340	<410	<330
Phenanthrene	500,000	<170	<210	<170
Phenol	330	<170	<210	<170
Pyrene	500,000	<170	<210	<170

Notes:

1. Allowable levels for imported fill for commercial or industrial use are from Appendix 5 of NYSDEC's May 2010 DER-10.
2. Units and analytical methods are as noted; milligrams per kilogram (mg/kg), micrograms per kilogram (µg/kg). Samples analyzed by TestAmerica Laboratory of Amherst, NY.
3. Results in **bold** print indicate positively identified compounds.
4. A "<" indicates the parameter was not detected above the given reporting limit.
5. "*" indicates a lab control sample or lab control sample duplicate is outside acceptance limits.
6. ND - Not detected.

FIGURES

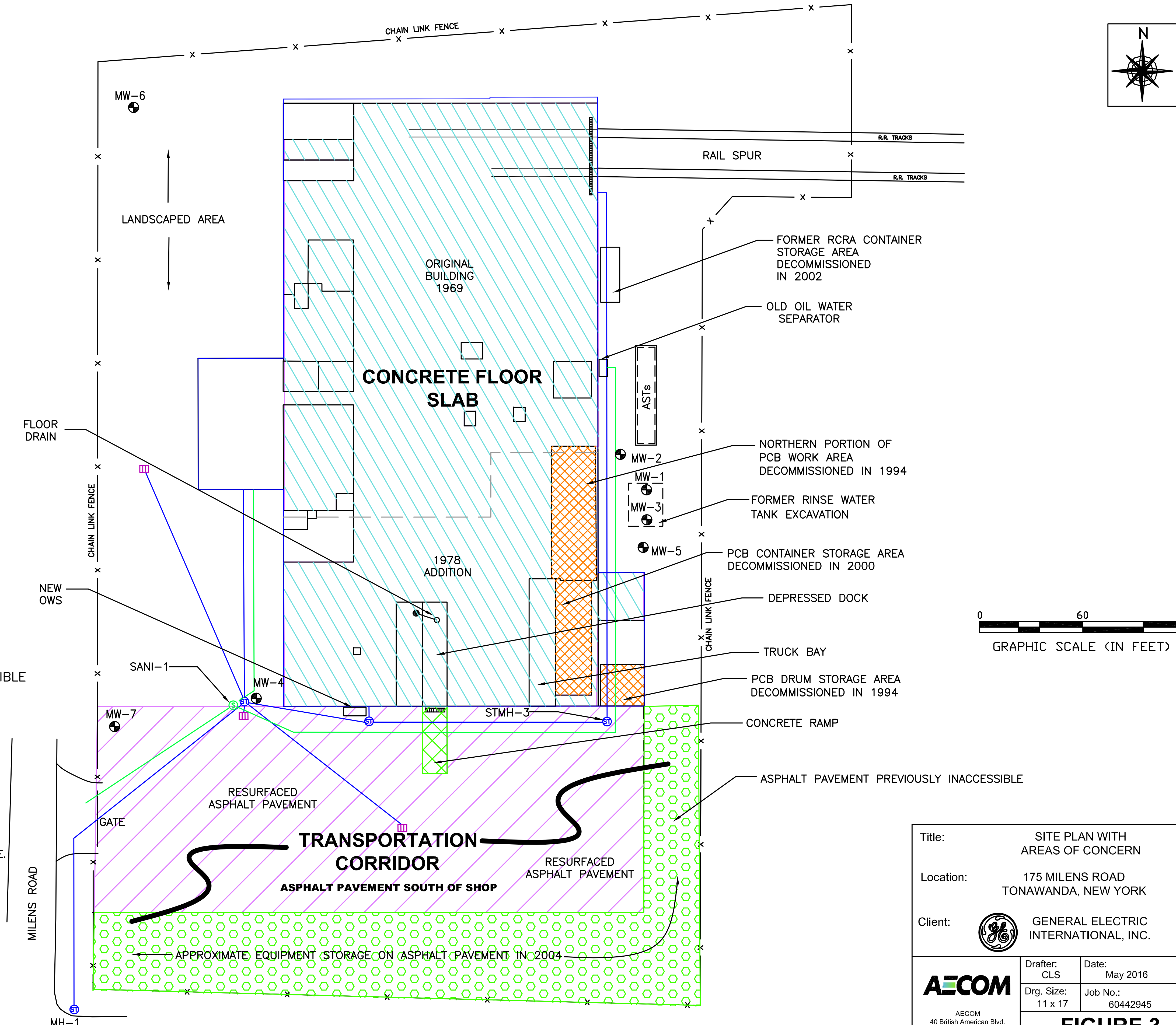
BASEMAP SOURCE:
Town of Tonawanda Public GIS Web Map
Property boundaries (shown in yellow) as downloaded.

Title:	ADJACANT PROPERTIES
Location:	175 MILENS ROAD TONAWANDA, NEW YORK
Client:	GENERAL ELECTRIC INTERNATIONAL, INC.

AECOM 40 British American Boulevard Latham, New York 12110	Drawn By: KP	Date: May 2016
	Drg. Size: 8.5 x 11	Job No.: 60442945
	FIGURE 2	

LEGEND

- DECOMMISSIONED PCB AREA
- TRENCH DRAIN
- STORM MANHOLE
- SANITARY MANHOLE
- CATCH BASIN
- STORM SEWER
- SANITARY SEWER
- MW4 – MONITORING WELL
- CLEANED AND EPOXY COATED CONCRETE SURFACES (2003–2004)
- ASPHALT PAVEMENT – SURFACE REMOVED AND REPLACED (2004)
- CONCRETE RAMP
- ASPHALT PAVEMENT PREVIOUSLY INACCESSIBLE



NOTES:

1. THE LOCATIONS OF SITE FEATURES ARE APPROXIMATE.
2. IN DECEMBER 2004, THE TOP INCH OF ASPHALT PAVEMENT IN THE TRANSPORTATION CORRIDOR WAS REMOVED, DISPOSED OF OFF–SITE, AND REPLACED WITH NEW ASPHALT. THE ASPHALT BENEATH THE EQUIPMENT STORAGE WAS NOT ACCESSIBLE AND THEREFORE NOT REPLACED AT THAT TIME.
3. BETWEEN DECEMBER 2003 AND MAY 2004 THE FACILITY CONCRETE FLOOR WAS SUBJECTED TO A DOUBLE WASH AND DOUBLE RINSE AND EPOXY COATED WITH CONTRASTING COLORS AND LABELING.
4. SOURCES FOR THIS FIGURE WERE:
   A. "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.
   B. "1/8" PART FLOOR PLAN AND DETAILS," CANNON DESIGN INC., AS–BUILT 4–19–78.

Title:	SITE PLAN WITH AREAS OF CONCERN
Location:	175 MILENS ROAD TONAWANDA, NEW YORK
Client:	GENERAL ELECTRIC INTERNATIONAL, INC.
AECOM 40 British American Blvd. Latham, New York 12110	Drafter: CLS; Date: May 2016; Drg. Size: 11 x 17; Job No.: 60442945

FIGURE 3

GE PROPERTY APPROXIMATELY 3,000 FEET TO THE NORTHEAST

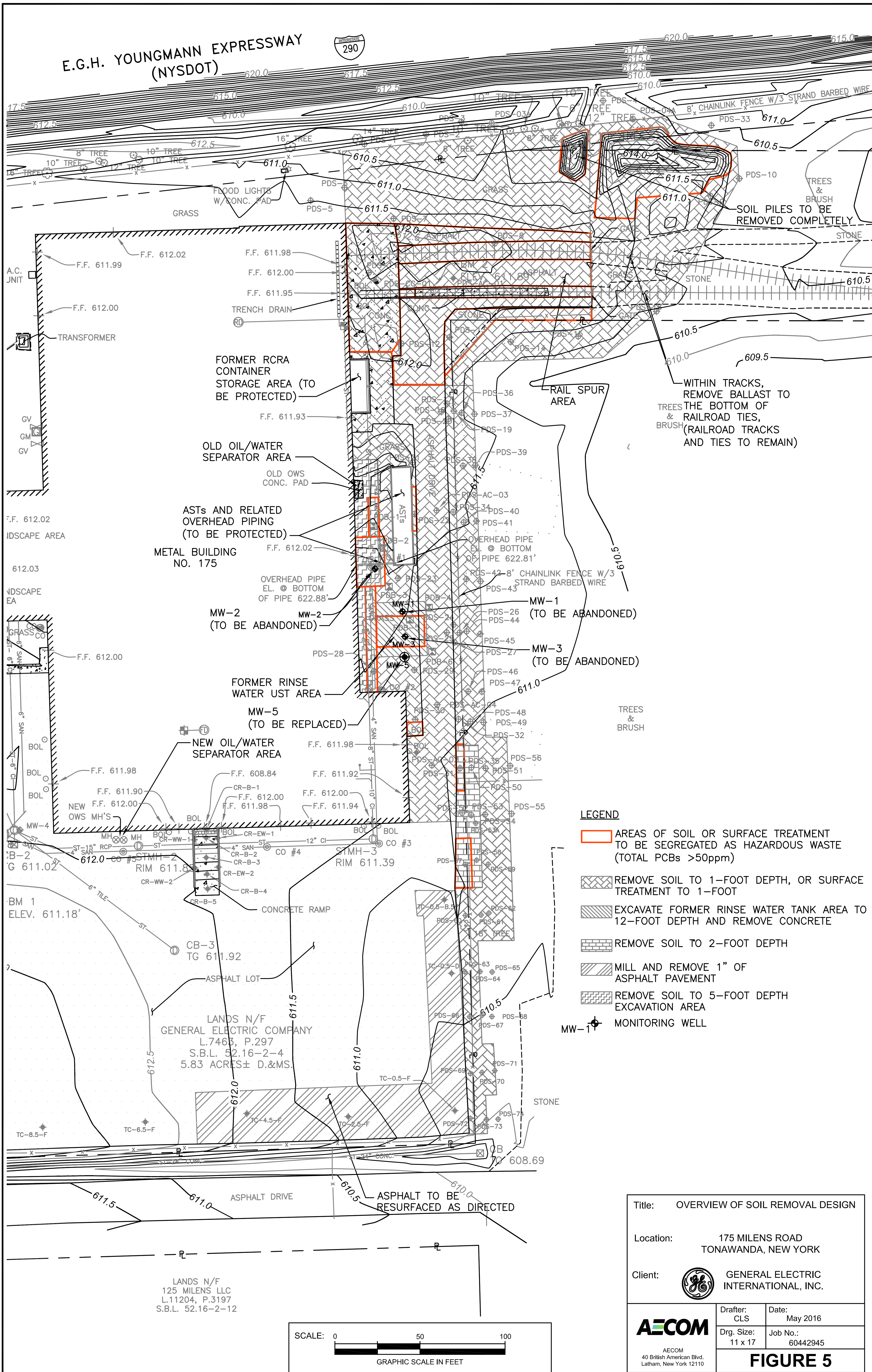
0 100 200

APPROXIMATE GRAPHIC SCALE IN FEET

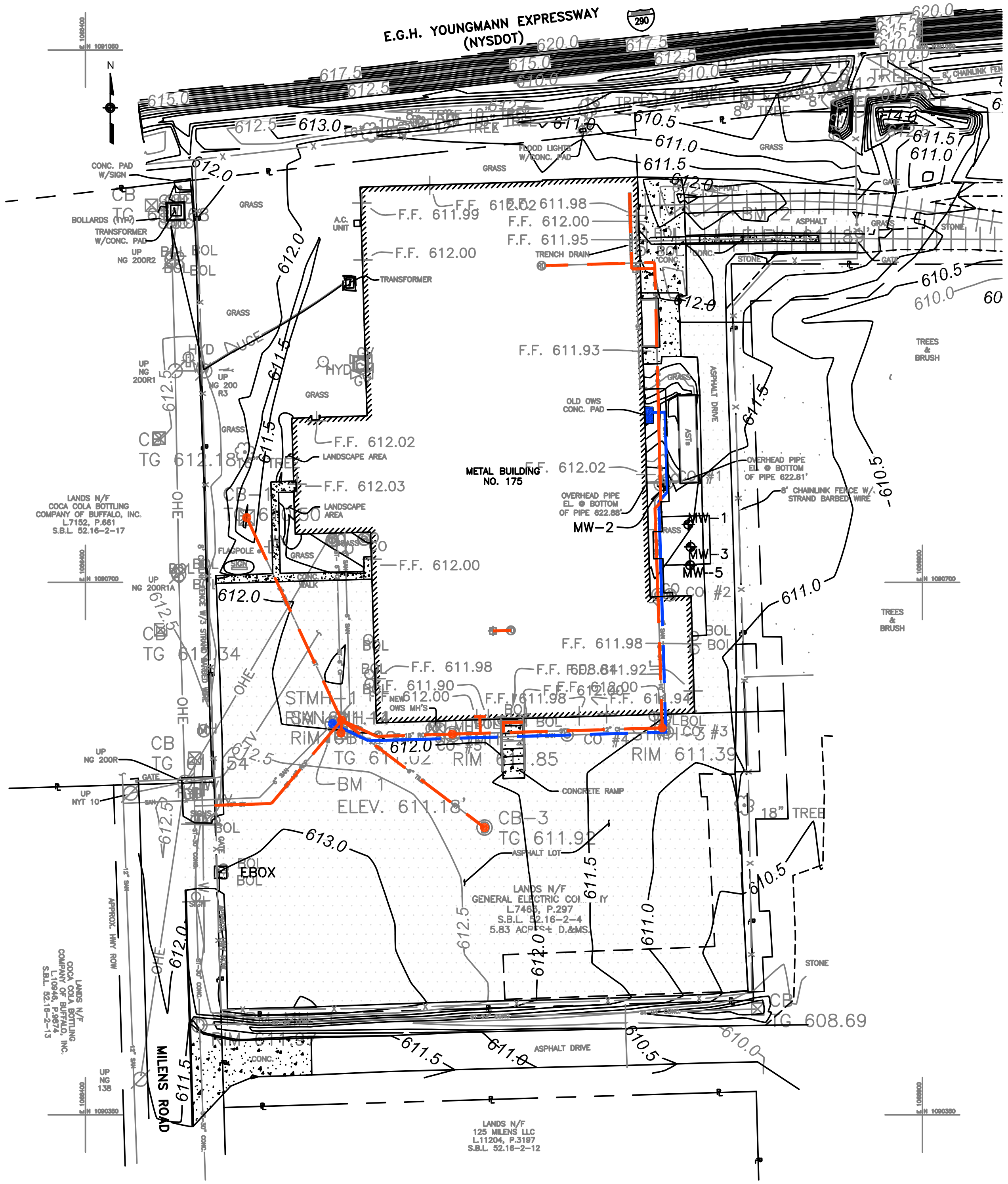
Title:	INTERIM CORRECTIVE MEASURES TWO MILE CREEK
Location:	TONAWANDA, NEW YORK
Client:	GENERAL ELECTRIC INTERNATIONAL, INC.

AECOM	Drafter: CLS	Date: May 2016
	Drg. Size: 8.5 x 11	Job No.: 60442945
AECOM 40 British American Boulevard Latham, New York 12110	FIGURE 4	

J:\60442945 GE-Tonawanda CMI Oversight\FER\Figures\Fig4_TMC_ICM.dwg User:carrie_szczeponski Jun 03, 2016 - 12:12pm

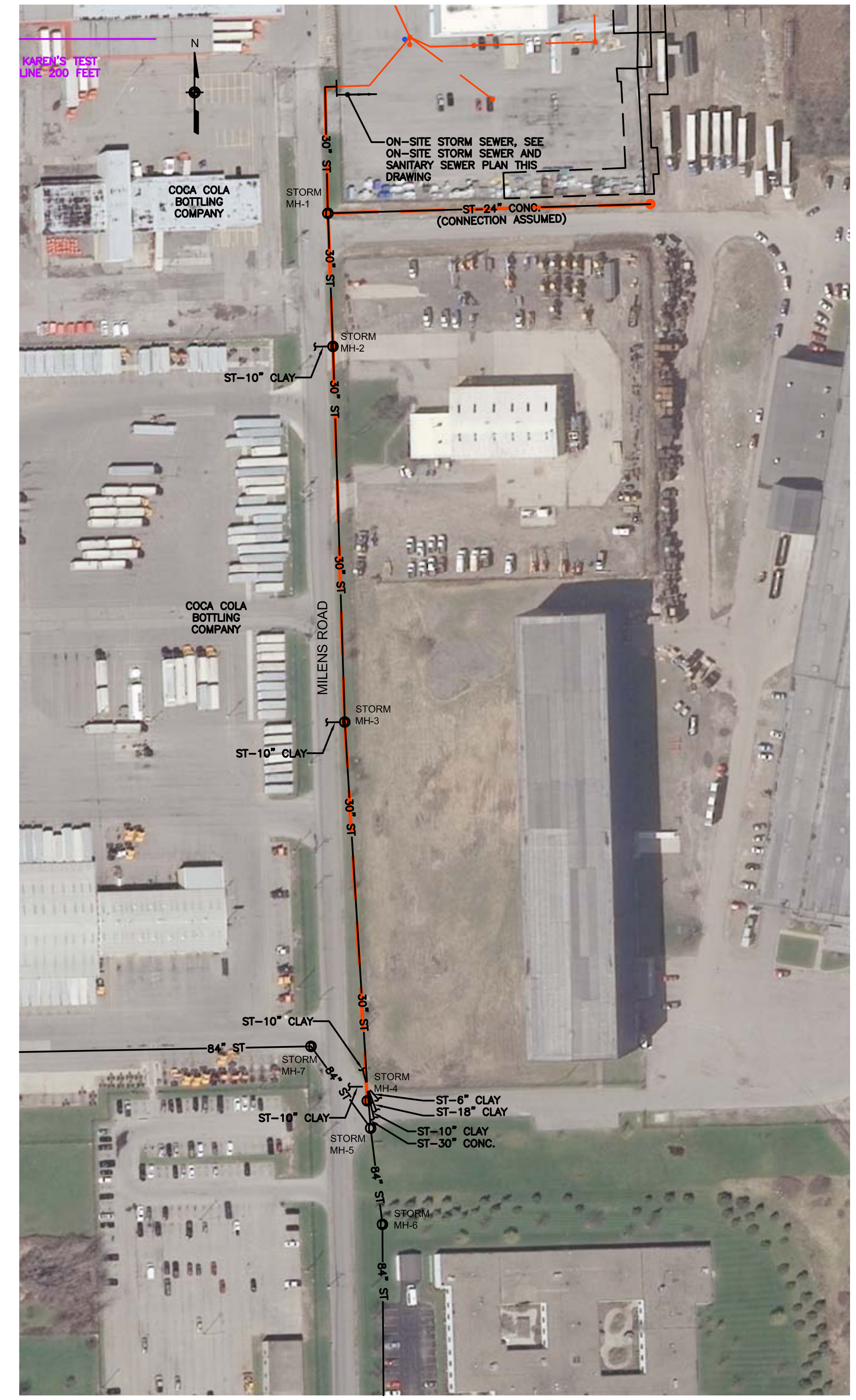


Filename: J:\60442945 GE-TONAWANDA CMI OVERSIGHT\FER\FIGURES\FIG5_SOIL_DESIGN.DWG



ON-SITE STORM SEWER
AND SANITARY SEWER PLAN

100' 0 100'
SCALE IN FEET



OFF-SITE STORM SEWER PLAN

200' 0 200'
SCALE IN FEET

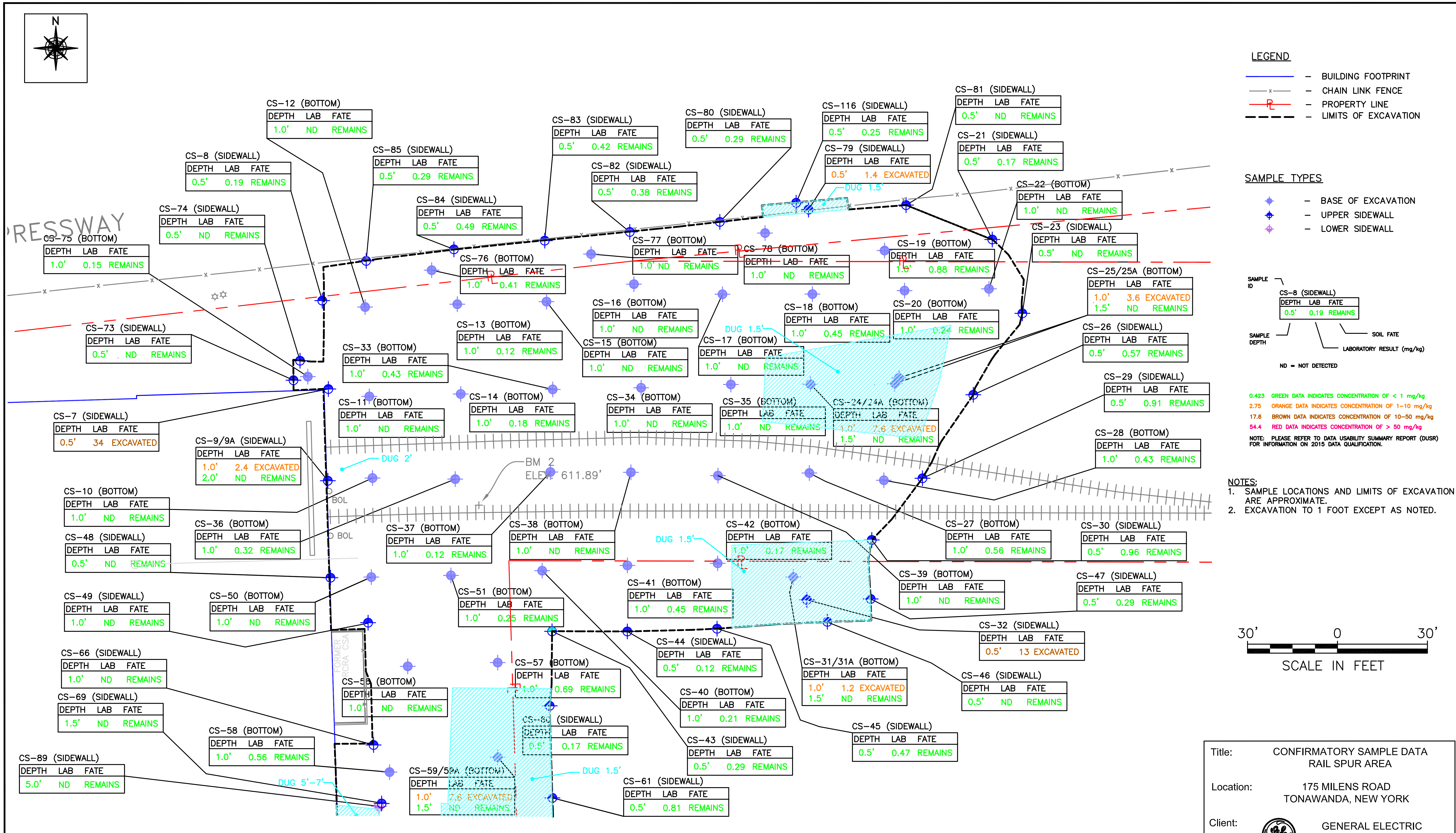
THIS FIGURE CONTAINS FEATURES INTENDED TO BE PRINTED IN COLOR. REPRODUCTION IN BLACK AND WHITE MAY OBSCURE THE INTENDED EFFECT OF THE COLOR FEATURES.

LEGEND

- STORM SEWER, TRENCH DRAINS, MANHOLES AND CATCH BASINS TO BE CLEANED IN PLACE
- APPROXIMATE LENGTH OF STORM SEWER TO BE REMOVED AND REPLACED
- APPROXIMATE LENGTH OF PREVIOUSLY-GROUTED SANITARY SEWER TO BE REMOVED
- SANITARY SEWER AND MANHOLE TO BE CLEANED AND LINED (PIPE ONLY)

Title:	ON-SITE SEWER AND OFF-SITE STORM SEWER CORRECTIVE MEASURES PLAN
Location:	175 MILENS ROAD TONAWANDA, NEW YORK
Client:	GENERAL ELECTRIC INTERNATIONAL, INC.
AECOM 40 British American Blvd. Latham, New York 12110	Drafter: CLS; Date: May 2016; Drg. Size: 11 x 17; Job No.: 60442945
	FIGURE 6

Last saved by: CARRIE_SZCZEPANSKI(2016-06-01) Last Plotted: 2016-06-03
Filename: J:\60442945 GE-TONAWANDA CMI OVERSIGHT\FER\FIGURES\FIG6_SEWER_PLAN.DWG



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. SURVEY BY NUSSBAUMER & CLARK, INC.
3. FIELD OBSERVATIONS.

Title: CONFIRMATORY SAMPLE DATA RAIL SPUR AREA

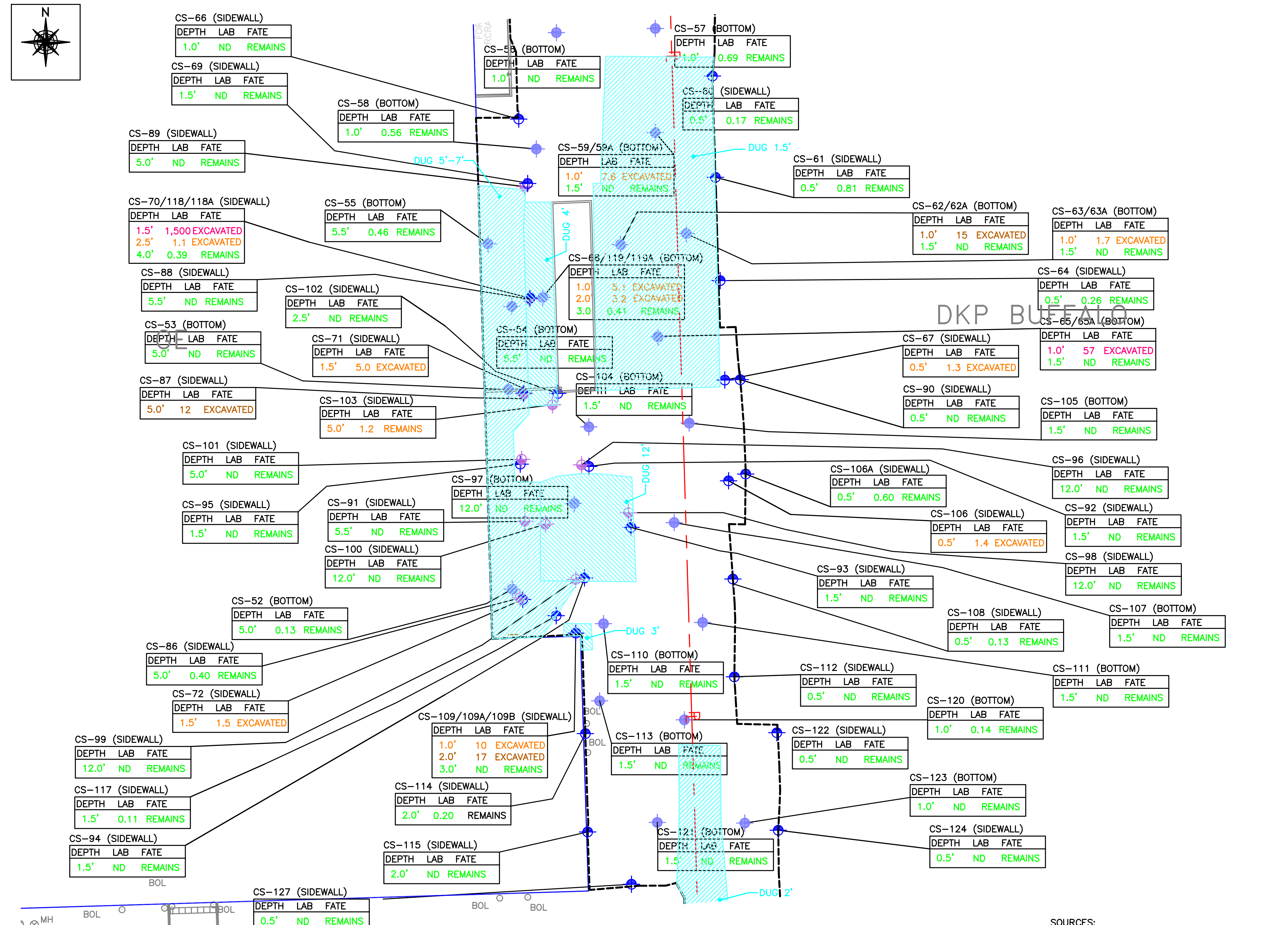
Location: 175 MILENS ROAD TONAWANDA, NEW YORK

Client: GENERAL ELECTRIC INTERNATIONAL, INC.

AECOM
AECOM 40 British American Blvd. Latham, New York 12110

Drafter: CLS
Date: May 2016
Drg. Size: 11 x 17
Job No.: 60442945

FIGURE 7



LEGEND

- BUILDING FOOTPRINT
- CHAIN LINK FENCE
- PROPERTY LINE
- LIMITS OF EXCAVATION

SAMPLE TYPES

- BASE OF EXCAVATION
- UPPER SIDEWALL
- LOWER SIDEWALL

SAMPLE ID — CS-8 (SIDEWALL)

DEPTH	LAB	FATE
0.5'	0.19	REMAINS

SAMPLE DEPTH — LABORATORY RESULT (mg/kg) — SOIL FATE

ND = NOT DETECTED

0.423 GREEN DATA INDICATES CONCENTRATION OF < 1 mg/kg
2.75 ORANGE DATA INDICATES CONCENTRATION OF 1–10 mg/kg
17.6 BROWN DATA INDICATES CONCENTRATION OF 10–50 mg/kg
54.4 RED DATA INDICATES CONCENTRATION OF > 50 mg/kg

NOTE: PLEASE REFER TO DATA USABILITY SUMMARY REPORT (DUSR) FOR INFORMATION ON 2015 DATA QUALIFICATION.

NOTES:
1. SAMPLE LOCATIONS AND LIMITS OF EXCAVATION ARE APPROXIMATE.
2. EXCAVATION TO 1 FOOT EXCEPT AS NOTED.

30' 0 30'
SCALE IN FEET

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. SURVEY BY NUSSBAUMER & CLARK, INC.
3. FIELD OBSERVATIONS.

Title: CONFIRMATORY SAMPLE DATA EAST OF BUILDING

Location: 175 MILENS ROAD TONAWANDA, NEW YORK

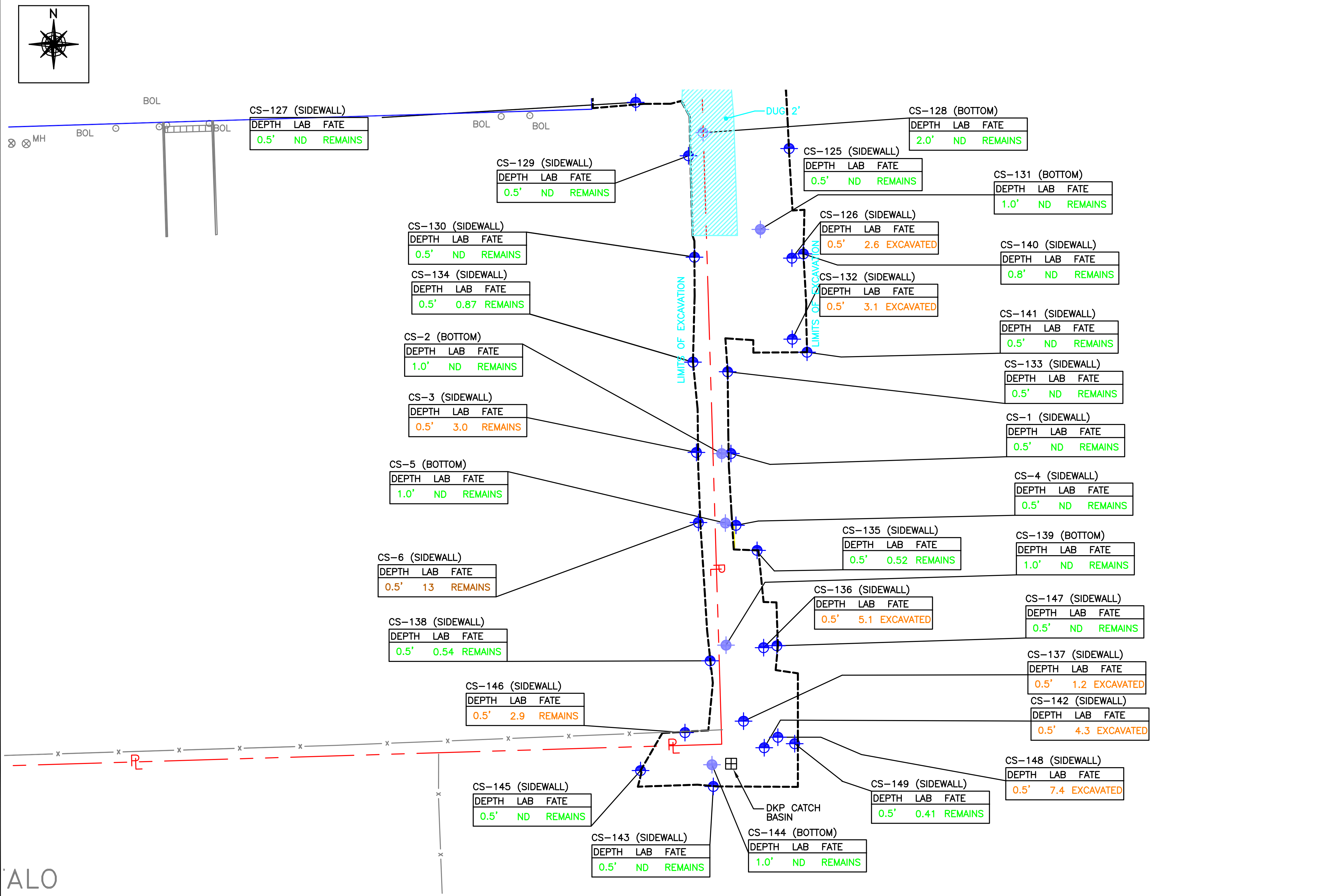
Client: GENERAL ELECTRIC INTERNATIONAL, INC.

AECOM
40 British American Blvd.
Latham, New York 12110

Drafter: CLS | Date: May 2016
Drg. Size: 11 x 17 | Job No.: 60442945

FIGURE 8

Filename: J:\60442945 GE-TONAWANDA CMI OVERSIGHT\FER\FIGURES\FIG7-9_DATA_SUM.DWG

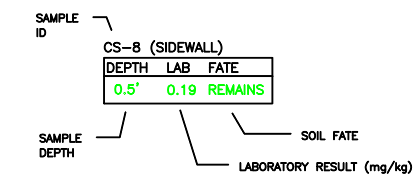


LEGEND

- BUILDING FOOTPRINT
- CHAIN LINK FENCE
- PROPERTY LINE
- LIMITS OF EXCAVATION

SAMPLE TYPES

- BASE OF EXCAVATION
- UPPER SIDEWALL
- LOWER SIDEWALL



ND = NOT DETECTED

0.423 GREEN DATA INDICATES CONCENTRATION OF < 1 mg/kg
2.75 ORANGE DATA INDICATES CONCENTRATION OF 1–10 mg/kg
17.6 BROWN DATA INDICATES CONCENTRATION OF 10–50 mg/kg
54.4 RED DATA INDICATES CONCENTRATION OF > 50 mg/kg

NOTE: PLEASE REFER TO DATA USABILITY SUMMARY REPORT (DUSR) FOR INFORMATION ON 2015 DATA QUALIFICATION.

NOTES:
1. SAMPLE LOCATIONS AND LIMITS OF EXCAVATION ARE APPROXIMATE.
2. EXCAVATION TO 1 FOOT EXCEPT AS NOTED.

30' 0 30'
SCALE IN FEET

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. SURVEY BY NUSSBAUMER & CLARK, INC.
3. FIELD OBSERVATIONS.

Title: CONFIRMATORY SAMPLE DATA EAST OF TRANSPORTATION CORRIDOR

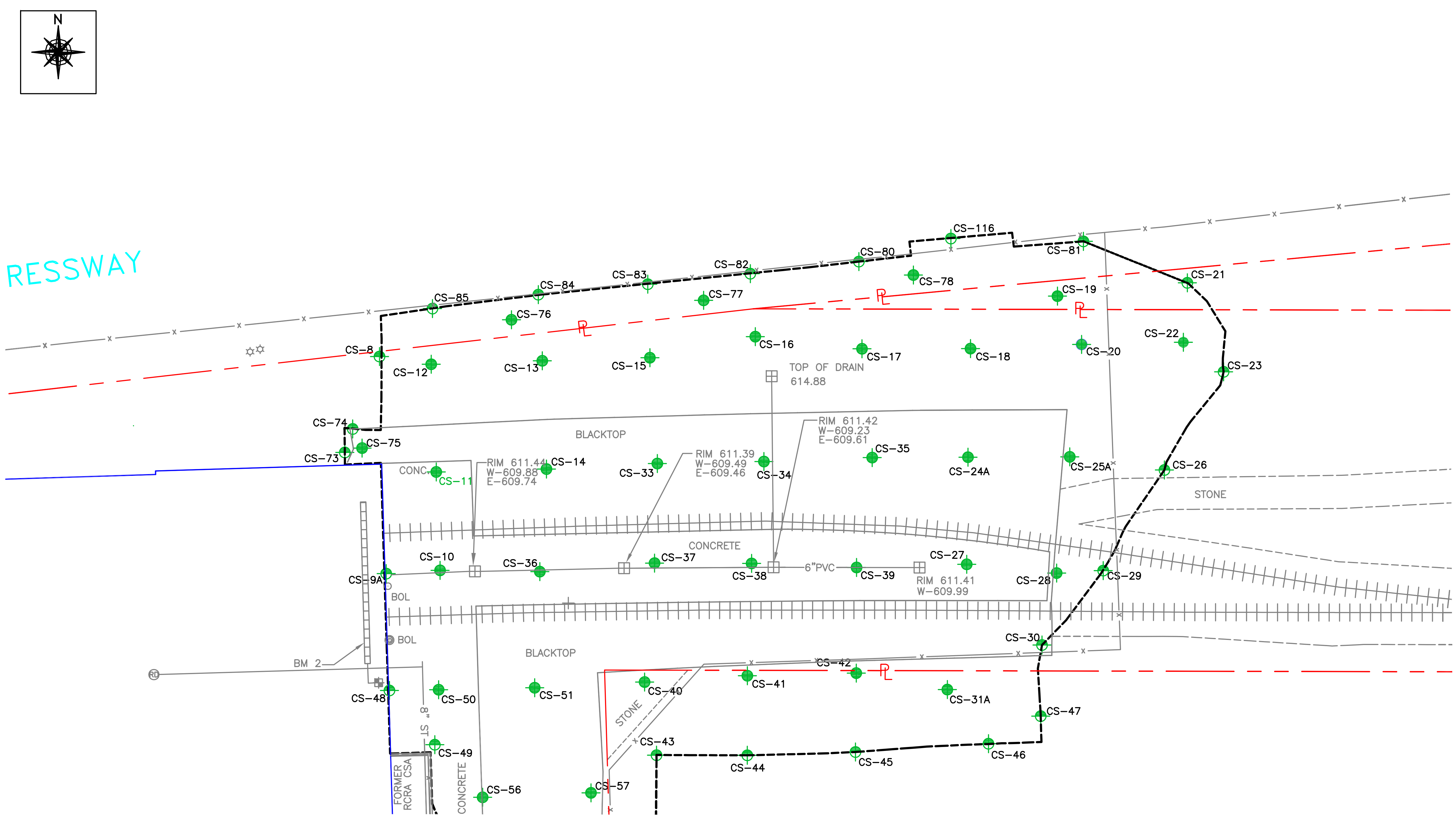
Location: 175 MILENS ROAD TONAWANDA, NEW YORK

Client: GENERAL ELECTRIC INTERNATIONAL, INC.

AECOM
AECOM
40 British American Blvd.
Latham, New York 12110

Drafter: CLS
Date: May 2016
Drg. Size: 11 x 17
Job No.: 60442945

FIGURE 9



LEGEND

- BUILDING FOOTPRINT
- CHAIN LINK FENCE
- PROPERTY LINE

CONFIRMATORY SOIL SAMPLE TYPES

- CS-2 – BASE OF EXCAVATION, <1mg/kg
- CS-1 – UPPER SIDEWALL, <1mg/kg
- CS-86 – LOWER SIDEWALL, <1mg/kg
- CS-3 – UPPER SIDEWALL, >1mg/kg
- CS-103 – LOWER SIDEWALL, >1mg/kg

NOTES:
1. SAMPLE LOCATIONS AND LIMITS OF EXCAVATION ARE APPROXIMATE.
2. SEE TABLE 6 FOR POST-REMEDIATION CONCENTRATIONS OF PCBs IN SOIL.

30' 0 30'
SCALE IN FEET

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. SURVEY BY NUSSBAUMER & CLARK, INC.
3. FIELD OBSERVATIONS.

Title: POST-REMEDIATION CONDITIONS RAIL SPUR AREA

Location: 175 MILENS ROAD TONAWANDA, NEW YORK

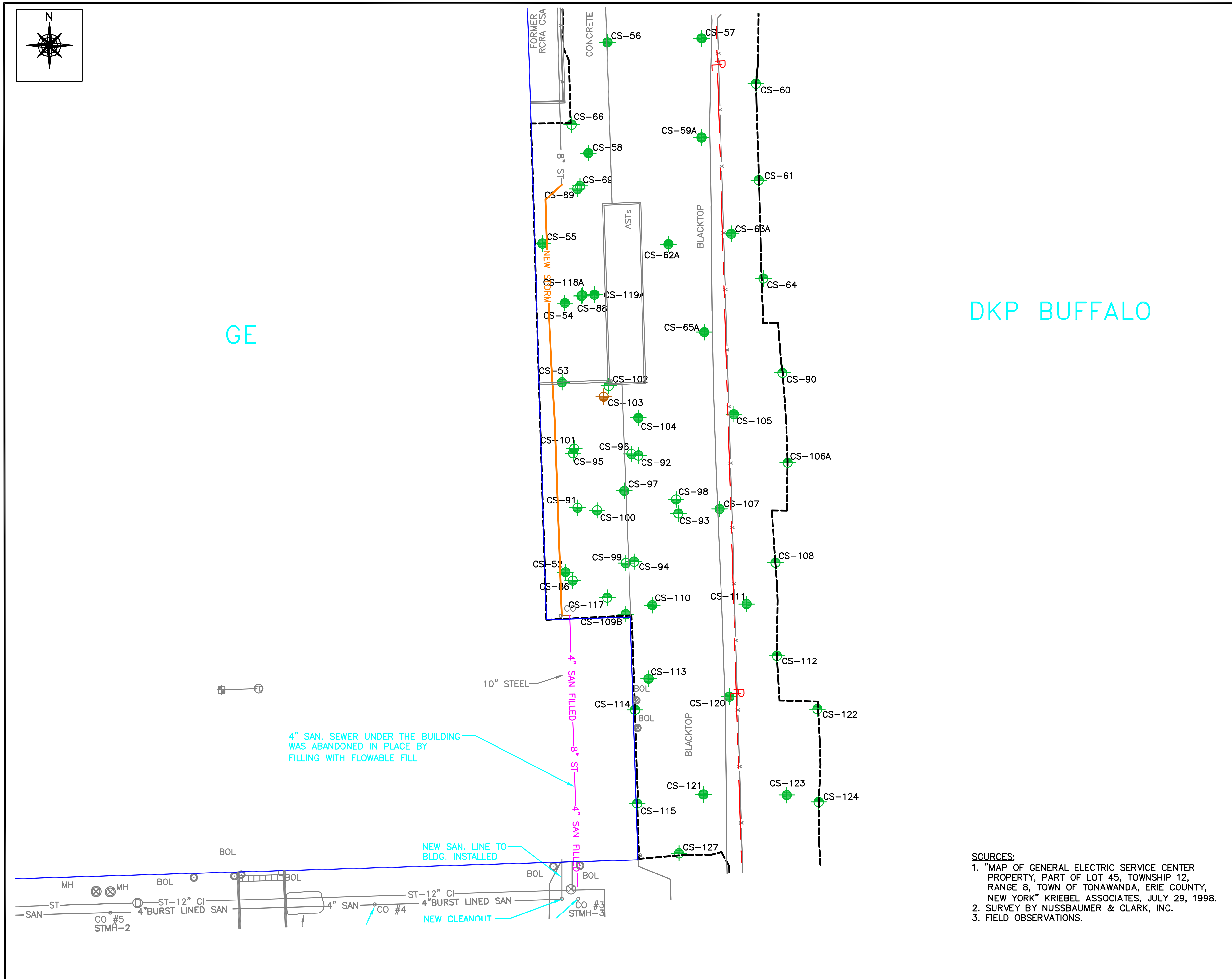
Client: GENERAL ELECTRIC INTERNATIONAL, INC.

AECOM
40 British American Blvd.
Latham, New York 12110

Drafter: CLS | Date: May 2016
Drg. Size: 11 x 17 | Job No.: 60442945

FIGURE 10

Filename: J:\60442945 GE-TONAWANDA CMI OVERSIGHT\FERI\FIGURES\FIG10-12_POST-REM_CONDITIONS.DWG



LEGEND

- BUILDING FOOTPRINT
- CHAIN LINK FENCE
- PROPERTY LINE

CONFIRMATORY SOIL SAMPLE TYPES

- CS–2 – BASE OF EXCAVATION, <1mg/kg
- CS–1 – UPPER SIDEWALL, <1mg/kg
- CS–86 – LOWER SIDEWALL, <1mg/kg
- CS–3 – UPPER SIDEWALL, >1mg/kg
- CS–103 – LOWER SIDEWALL, >1mg/kg

NOTES:
1. SAMPLE LOCATIONS AND LIMITS OF EXCAVATION ARE APPROXIMATE.
2. SEE TABLE 6 FOR POST–REMEDIATION CONCENTRATIONS OF PCBs IN SOIL.

30' 0 30'
SCALE IN FEET

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. SURVEY BY NUSSBAUMER & CLARK, INC.
3. FIELD OBSERVATIONS.

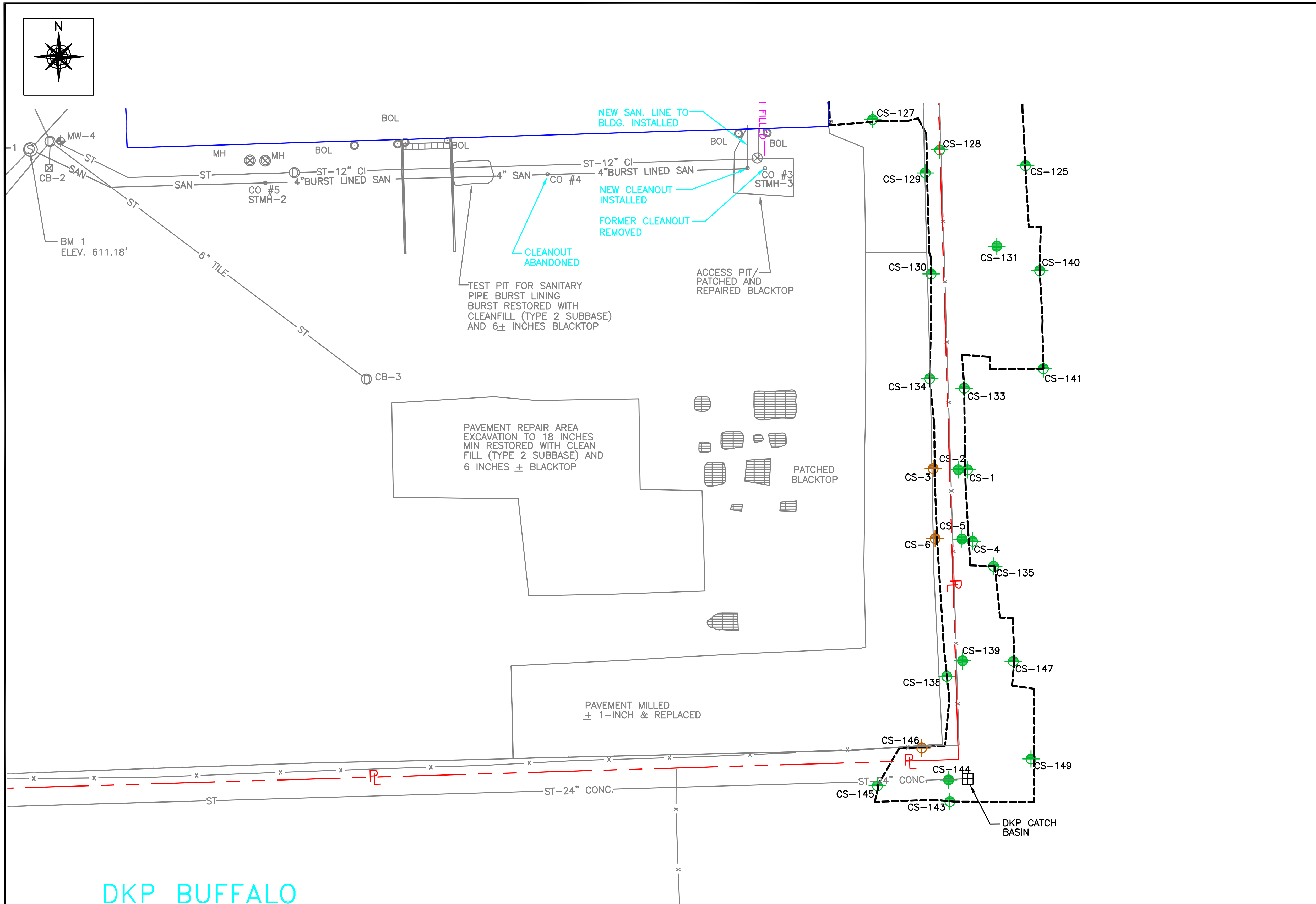
Title:	POST-REMEDIATION CONDITIONS EAST OF BUILDING
Location:	175 MILENS ROAD TONAWANDA, NEW YORK
Client:	GENERAL ELECTRIC INTERNATIONAL, INC.

AECOM
AECOM 40 British American Blvd. Latham, New York 12110

Drafter: CLS	Date: May 2016
Drg. Size: 11 x 17	Job No.: 60442945

FIGURE 11

Filename: J:\60442945 GE-TONAWANDA CMI OVERSIGHT\FER\FIGURES\FIG10-12_POST-REM_CONDITIONS.DWG



LEGEND

- BUILDING FOOTPRINT
- CHAIN LINK FENCE
- PROPERTY LINE
- BLACKTOP SURFACE PATCH

CONFIRMATORY SOIL SAMPLE TYPES

- CS-2 – BASE OF EXCAVATION, <1mg/kg
- CS-1 – UPPER SIDEWALL, <1mg/kg
- CS-86 – LOWER SIDEWALL, <1mg/kg
- CS-3 – UPPER SIDEWALL, >1mg/kg
- CS-103 – LOWER SIDEWALL, >1mg/kg

NOTES:
1. SAMPLE LOCATIONS AND LIMITS OF EXCAVATION ARE APPROXIMATE.
2. SEE TABLE 6 FOR POST-REMEDIATION CONCENTRATIONS OF PCBs IN SOIL.

30' 0 30'
SCALE IN FEET

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. SURVEY BY NUSSBAUMER & CLARK, INC.
3. FIELD OBSERVATIONS.

Title: POST-REMEDIATION CONDITIONS EAST OF TRANSPORTATION CORRIDOR

Location: 175 MILENS ROAD TONAWANDA, NEW YORK

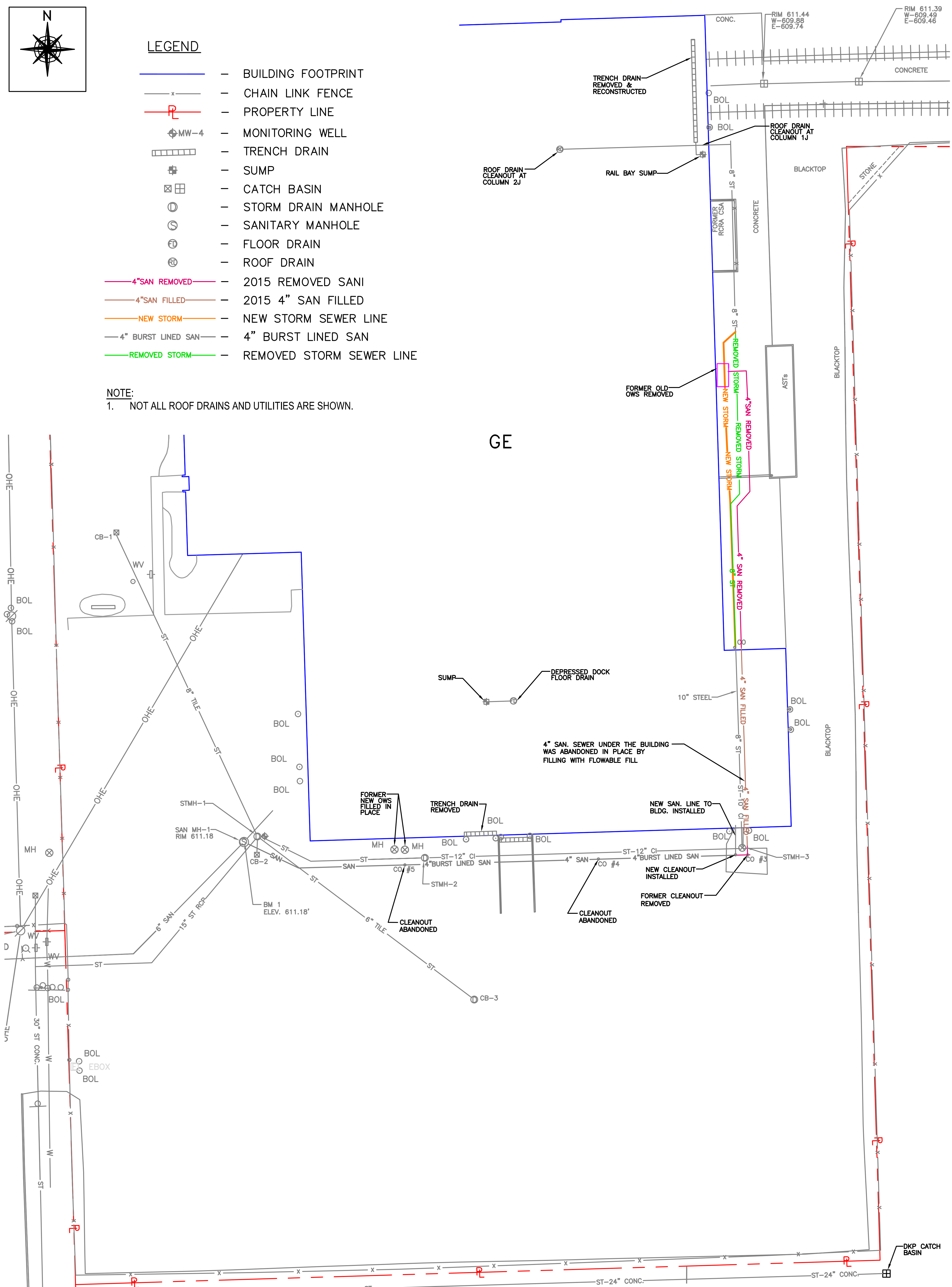
Client: GENERAL ELECTRIC INTERNATIONAL, INC.

AECOM
AECOM
40 British American Blvd.
Latham, New York 12110

Drafter: CLS
Date: May 2016
Drg. Size: 11 x 17
Job No.: 60442945

FIGURE 12

Filename: J:\60442945 GE-TONAWANDA CMI OVERSIGHT\FER\FIGURES\FIG10-12_POST-REM_CONDITIONS.DWG



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. SURVEY BY NUSSBAUMER & CLARK, INC.
3. FIELD OBSERVATIONS.

0 20 40
GRAPHIC SCALE IN FEET

Title: SUMMARY OF 2015 ON-SITE SEWER WORK

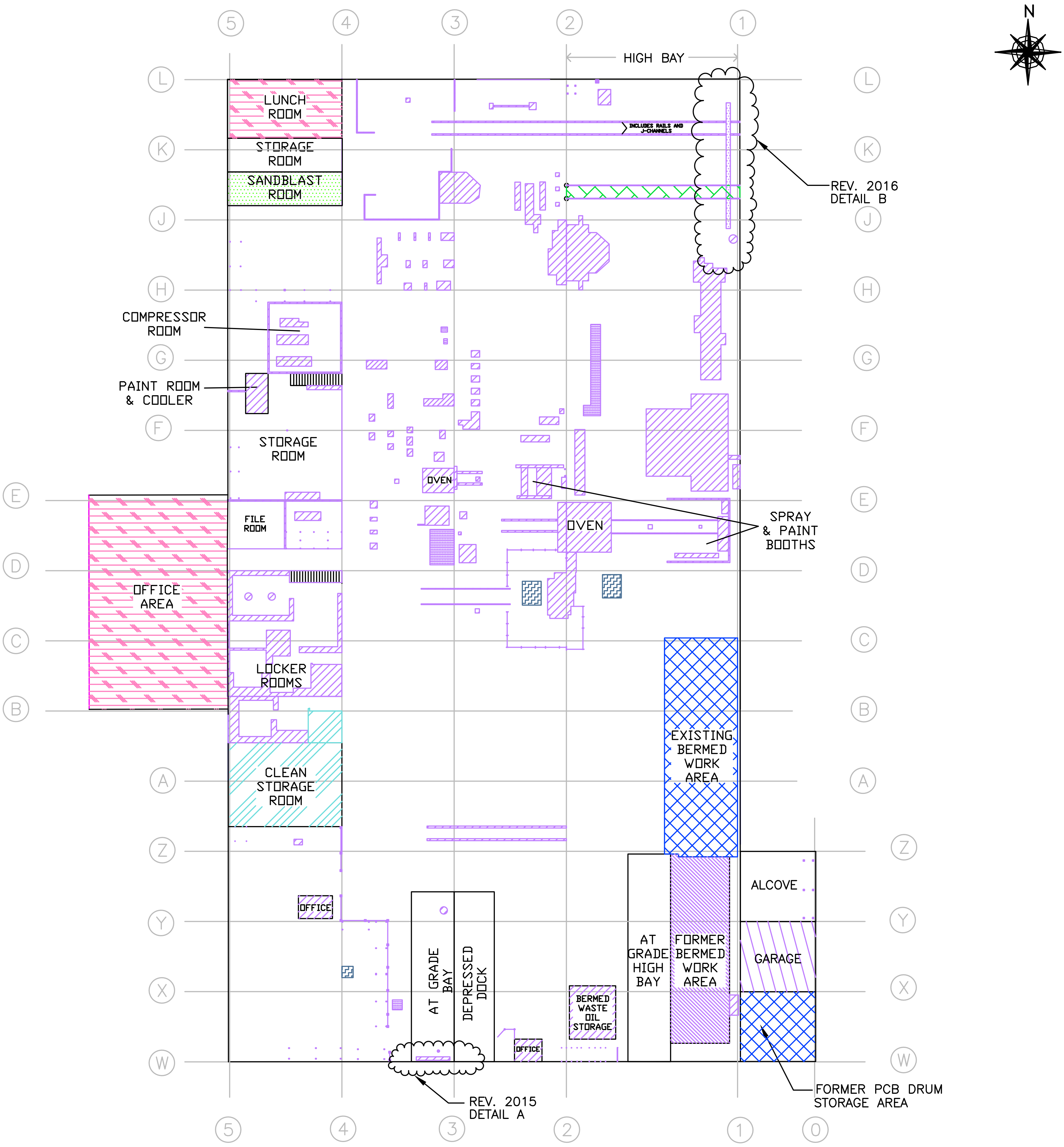
Location: 175 MILENS ROAD, TONAWANDA, NEW YORK

Client: GENERAL ELECTRIC INTERNATIONAL, INC.

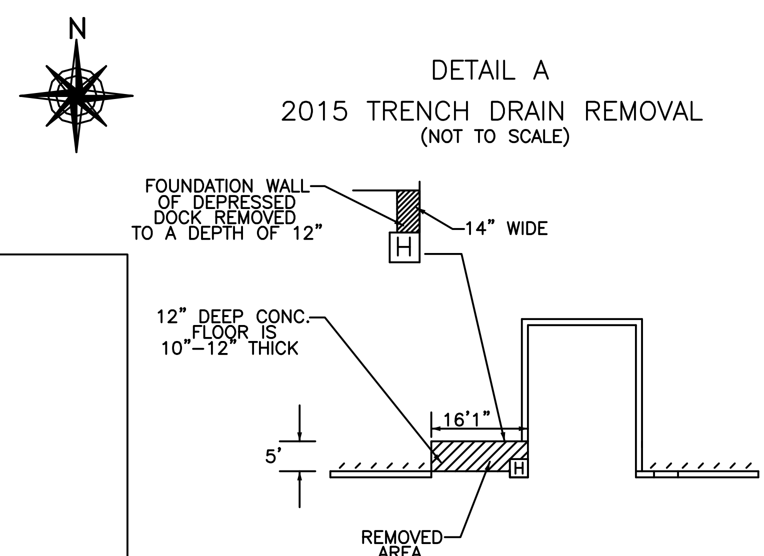
AECOM
40 British American Blvd.
Latham, New York 12110

Drafter: CLS	Date: May 2016
Drg. Size: 11 x 17	Job No.: 60442945

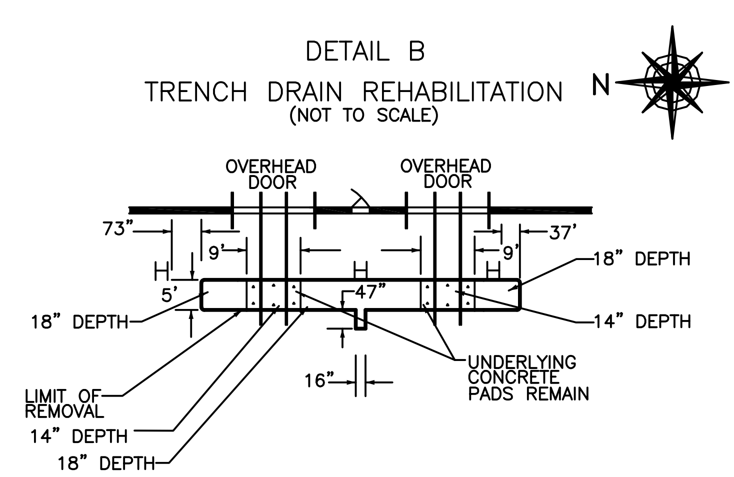
FIGURE 13



DETAIL A
2015 TRENCH DRAIN REMOVAL
(NOT TO SCALE)



DETAIL B
TRENCH DRAIN REHABILITATION
(NOT TO SCALE)



LEGEND

- Coating Completed
- Equipment/Office Removed, Coating Completed
- Drain Area Repaired, Coating Reapplied
- Inaccessible Areas, Coating Not Required
- Non-Contiguous Area, Coating Not Required
- Non-Manufacturing Areas
- Area Previously Clean Closed in 1994, Coating Not Required
- Area Documented Clean, Coating Not Required
- Cleaned Grounding Plate, Coating Not Required
- PCB-Contaminated, Asbestos-Containing Tile Removed, Coating Not Required
- Epoxy Top Coat Completed Over Existing Clean Base Coat for Aesthetics
- Heaved Concrete Replaced

NOTES:
1. Inaccessible areas are based on measurements taken during epoxy coating activities (December 2003 through June 2004).
2. The walls of the depressed dock were also coated with epoxy.
3. Interior of main shop area is 180 feet by 350 feet.
4. Epoxy coating shown reflects 2004 conditions except as noted revised in 2015 to 2016.

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. "1/16 Floor Plan and Mezzanine Floor Plan" Cannon Design, Inc., April 19, 1978.
3. "1/8 Part Floor Plan and Details" Cannon Design, Inc., April 19, 1978.

SCALE: 0 40 80
GRAPHIC SCALE IN FEET

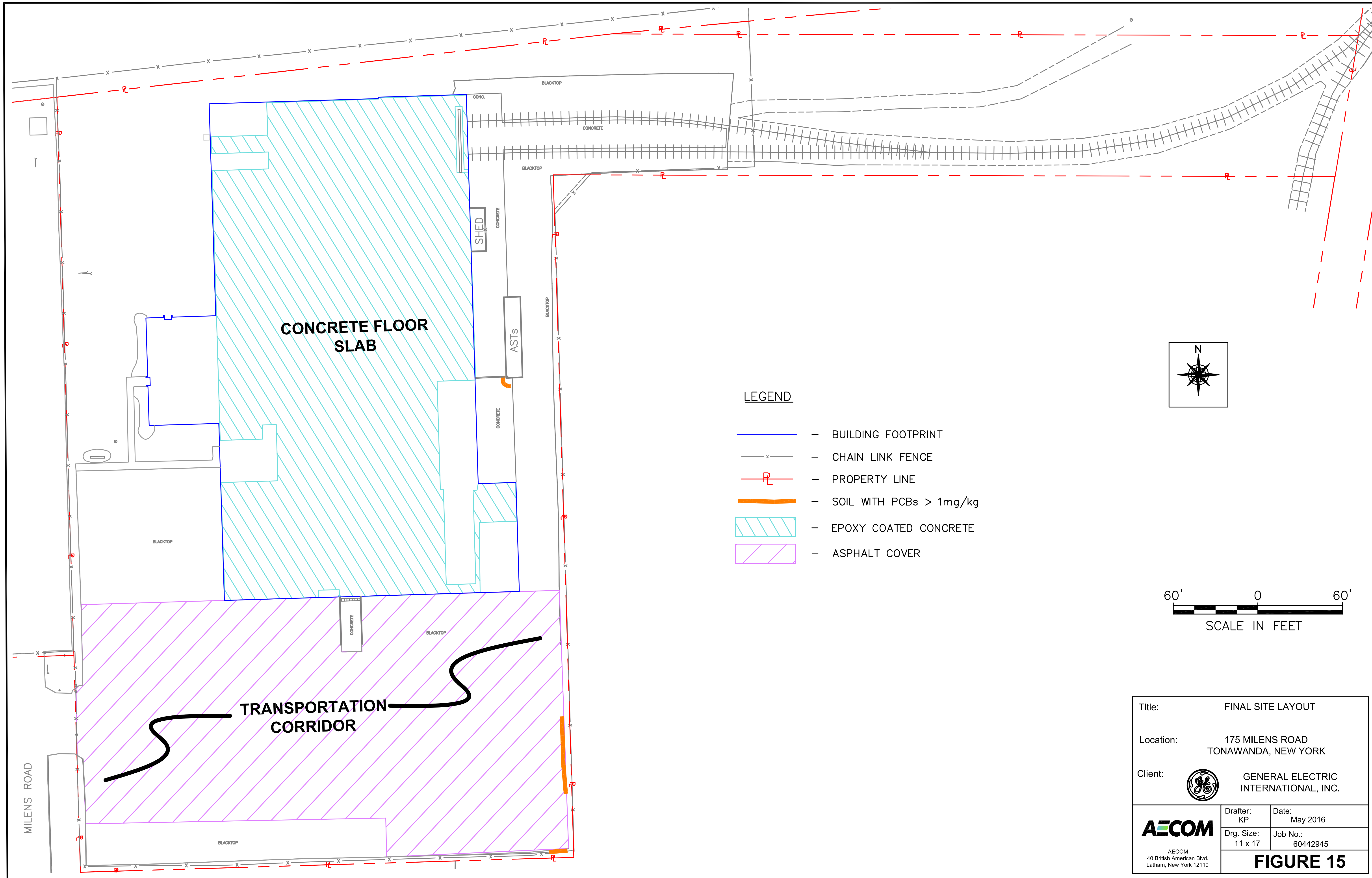
Title:	EPOXY COATED AREAS AS OF JUNE 2004
Location:	175 MILENS ROAD TONAWANDA, NEW YORK
Client:	GENERAL ELECTRIC INTERNATIONAL, INC.

AECOM
AECOM
40 British American Blvd.
Latham, New York 12110

Drafter: CLS	Date: May 2016
Drg. Size: 11 x 17	Job No.: 60442945

FIGURE 14

P:\Client Documents\General Electric\Tonawanda\PCB Storage Area Closure\38394429\38394429 2006 Cert Report\Figures\F8 Epoxy Coated.dwg



Filename: J:\60442945 GE-TONAWANDA CMI OVERSIGHT\ER\FIGURES\FIG15_FINAL_SITE_LAYOUT.DWG

APPENDIX A

NYSDEC *CMID* RERPORT APPROVAL LETTER

APPENDIX B

PROJECT PERMITS

APPENDIX C

PHOTOGRAPHIC LOG – SITE WORK AND SOIL REMOVAL

APPENDIX D

COMMUNITY AIR MONITORING DATA

PROVIDED ON DATA DISK

APPENDIX E

LABORATORY ANALYTICAL REPORTS
FOR
CONFIRMATORY SOIL SAMPLES

PROVIDED ON DATA DISK

APPENDIX F

DATA USABILITY SUMMARY REPORTS

PROVIDED ON DATA DISK

APPENDIX G

PHOTOGRAPHIC LOG – STORM SEWER CLEANING

APPENDIX H

LABORATORY ANALYTICAL REPORTS
FOR
TREATED WASTEWATER

PROVIDED ON DATA DISK

APPENDIX I

LABORATORY ANALYTICAL REPORTS
FOR
WASTEWATER TREATMENT PLANT WASTE MANAGEMENT

PROVIDED ON DATA DISK

APPENDIX J

LABORATORY ANALYTICAL REPORTS
FOR
EQUIPMENT WIPE SAMPLES

PROVIDED ON DATA DISK

APPENDIX K

LABORATORY ANALYTICAL REPORTS
FOR
WASTE CHARACTERIATION SAMPLES

PROVIDED ON DATA DISK

APPENDIX L

HAZARDOUS WASTE MANIFESTS

PROVIDED ON DATA DISK

APPENDIX M

NONHAZARDOUS WASTE MANIFESTS

PROVIDED ON DATA DISK

APPENDIX N

CLEAN FILL DOCUMETNTATION

PROVIDED ON DATA DISK

APPENDIX O

LICENSED SURVEYOR
STAMPED AS-BUILT DRAWING

APPENDIX P

PROFESSIONAL ENGINEER STAMPED AS-BUILT DRAWING