O'BRIEN & GERE
ENGINEERS, INC.

November 10, 1995

Mr. Stephen Hammond
Director, Central Remedial Action Bureau
Division of Hazardous Waste Remediation
New York State Department of Environmental Conservation
50 Wolf Road
Albany, New York 12233-7010

Re: GE Fort Edward RI/FS
Order on Consent Index #A5-0316-94-06

File: 5731.031

Dear Mr. Hammond:

At the request of Mark G. Herwig, General Electric Company, I have enclosed four copies (one unbound) of the Feasibility Study Work Plan for the GE - Fort Edward facility for your review and approval. Please be advised that the risk assessment work plan is in final review and will be delivered for your review and approval as soon as practicable. If you have any questions, please feel free to call Mark Herwig at 458-6617.

Very truly yours,

O'BRIEN & GERE ENGINEERS, INC.

John M. Uruskyj, C.P.G.
Managing Scientist

JMU:mhc\fted-031\hammond.let

cc: Mark G. Herwig - General Electric
NYSDOH-BEEI
NYSDEC - Region 5
C.E. Sullivan

WORK PLAN

Feasibility Study

General Electric Company
Transmission Systems
Fort Edward, New York

November 1995

O'BRIEN & GERE
ENGINEERS, INC.

5731.031

Work Plan

Feasibility Study

General Electric Company
Transmission Systems
Fort Edward, New York

November 1995

O'BRIEN & GERE
ENGINEERS, INC.
22 Computer Drive West
Albany, New York 12205

Contents

Figures

1. Introduction

This work plan has been developed by O'Brien & Gere Engineers, Inc. (O'Brien & Gere) on behalf of the General Electric Company (GE). The purpose of this work plan is to describe the scope of the feasibility study (FS) which will be conducted for the GE Fort Edward plant. This FS is being conducted pursuant to an Order on Consent Index #A5-0316-94-06 (Order) between the State of New York Department of Environmental Conservation (NYSDEC) and GE, and the Remedial Investigation/Feasibility Study (RI/FS) Work Plan (O'Brien & Gere, 1995a) for the site. The RI/FS Work Plan specified that a FS Work Plan be submitted within 90 calendar days of the effective date of the Order for the site to present procedures to be used during the FS. This FS Work Plan also includes a schedule for implementation and the identification of standards, criteria, and guidelines potentially applicable to the site.

This FS will be conducted in accordance with provisions of the Comprehensive Environmental Response, Compensation and Liability Act, as amended (CERCLA), the National Contingency Plan (NCP 1990), USEPA's *Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA (1988)*, and the State of New York's Inactive Hazardous Waste Disposal Site law and implementing regulations. Completion of this work will also satisfy corrective action obligations related to the facility pursuant to the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act and the Hazardous and Solid Waste Amendments and the New York ECL Article 27, Title 9.

1.1. Project Objectives

During the past two decades, GE, in consultation with NYSDEC and the New York State Department of Health (NYSDOH), has sought to address environmental issues at the Fort Edward facility. The measures implemented to address these issues have been significant and effective at curtailing the migration of contaminants.

A comprehensive RI/FS is being implemented at the site to expand and integrate investigation and remedial activities at and in the vicinity of the Fort Edward facility. The objectives for the comprehensive RI/FS include:

(1) evaluating impacts, if any, of contaminants that may have previously migrated off-site on human health and the environment, including the potential impact on the Hudson River;

(2) determining if contamination continues to migrate off-site;

(3) implementing interim remedial measures (IRMs) as necessary;

(4) gathering engineering data required to perform a FS;

(5) evaluating remedial alternatives and selecting preferred remedial alternatives when appropriate; and

(6) satisfying any corrective action obligations pursuant to the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act and the Hazardous and Solid Waste Amendments and the New York ECL Article 27, Title 9.

The specific objective for this FS is to develop and evaluate remedial alternatives which address contamination on a site-wide basis, such that a cost-effective remedy can be proposed for the site which is protective of human health and the environment and meets pertinent regulatory requirements.

1.2. Work Plan Organization

The FS Work Plan is organized as follows:

Section 1 - Introduction Information regarding project overview and objectives and document organization is presented in Section 1 of this work plan.

Section 2 - Site Background Section 2 contains a description of site characteristics and history, as well as project background related to the ongoing RI/FS activities and interim remedial measure (IRM).

Section 3 - Feasibility Study The procedures to be followed during the development, screening, and evaluation of potential remedial alternatives for the site are presented in Section 3.

Section 4 - Project Schedule and Deliverables The anticipated schedule for implementation of the FS, as well as a discussion of project deliverables, are presented in Section 4.

2. Site Background

2.1. Site Description

The study area is the GE Fort Edward Plant located approximately 800 feet east of the Hudson River between the Villages of Hudson Falls to the north, and Fort Edward to the south. The facility is approximately 32 acres and bounded on the east by Broadway, on the south by Park Avenue and the Delaware & Hudson Railroad/Allen Street on the west as shown on Figure 2-1. As shown on Figure 2-1, an approximately 200 foot wide parcel located between Allen Street and the Hudson River is also owned by GE and is part of the study area.

2.2. Brief Site History

As reported in the Site Remedial Investigation prepared by Lawler, Matusky & Skelly, the Fort Edward Plant has been in operation since 1942. Between 1942 and 1946 selsyn motors were manufactured for the U.S. Department of Defense; since 1946 the plant has produced small industrial capacitors. Operations related to capacitor production have included aluminum rolling, tin plating, capacitor recovery and salvage operations, polypropylene film manufacture, refining and blending of dielectric fluids, and quality control operations. Various cleaning operations to remove residues resulting from fabrication have also been conducted at the site. Among the products used in various operations were polychlorinated biphenyls (PCBs) chlorinated and non-chlorinated, organic solvents, and kerosene. PCB use as a dielectric fluid at the site was discontinued in 1977. The plant has eliminated its use of organic solvents in recent years by modifying processes, installing new state-of-the-art processes, and implementing waste minimization programs.

Present facilities on the Fort Edward plant (Figure 2-2) consist of several buildings, a concrete basin on the southwest corner of the property, and parking areas. The largest building is subdivided into four sections as follows: (1) original manufacturing building (Bldg. 23), (2) addition to manufacturing building (Bldg. 23 ext.), (3) warehouse (Bldg. 23-A), and (4) capacitor plant expansion (Bldg. 23-B). Building 23-A was

subsequently expanded to include a finished goods warehouse (Bldg. 26) and a maintenance and waste storage building (Bldg. 31). The second building, the aluminum rolling mill (Bldg. 40), has been expanded several times since its original construction. Smaller buildings on the site include a pump house, a maintenance building, and the wastewater treatment facility. Rolling mill operations were terminated in 1995 and some minor assembly and testing operations from the Hudson Falls facility were moved to Building 40.

Prior to construction of the existing wastewater treatment facility in 1976, storm water and in-plant waste water converged at a manhole (MH-4) located directly west of the southwest corner of the current Foil Mill (shown in Figure 2-3). Wastewater was discharged from MH-4 directly to the Hudson River through a 30-inch vitrified clay pipe (VCP).

Sanitary wastes prior to 1976 from the Foil Mill and the Main Plant were directed to a lift station located approximately 90 feet south of the Foil Mill and sent to an on-site septic tank/leach field system. Sanitary wastes generated at the guard house and Building 23-A (warehouse) were sent to separate septic systems.

Modifications to the GE Fort Edward wastewater system were primarily completed in 1976 and 1977 and included the replacement and rerouting of wastewater to a newly constructed wastewater collection/treatment system. A 40,000 gallon per day (gpd or gal/day) extended aeration system was installed to treat sanitary wastes generated at the site. A 1.8 million gallon concrete equalization basin was constructed in the southwest corner of the site. Site wastewater (including treated sanitary effluent) and storm water were directed to the basin, treated at the newly constructed site treatment plant and discharged pursuant to a SPDES permit to the Hudson River through a new 6-inch line. The layout of the current wastewater treatment system is shown on Figure 2-4.

Since 1976 numerous improvements, investigations and remedial actions have been undertaken by GE at the Fort Edward plant to reduce the potential impact of the site on the surrounding community and the Hudson River. These actions include but are not limited to the following:

- Implementation of the PCB abatement program conducted pursuant to the 1976 Agreement with the State of New York;

- Conducting a site RI pursuant to Order on Consent Index #T032785 (LMS, 1985);

- In accordance with NYSDOH Recommendations, GE paid for and caused installation of water mains and piping for households on Park Avenue, Stevens Lane, Ethan Allen Street and Putnam Avenue (NYSDEC, 1985);

- Conducting on-site and off-site FS's pursuant to Order on Consent #T032785 (LMS, 1988, 1989) and preparation of on-site and off-site remedial plans (LMS, 1989; Dunn, 1990);

- Implementation of NYSDEC-approved on-site and off-site remedial plans pursuant to Order on Consent #T032785;

- Since October 1983, ground water from the shallow unconsolidated aquifer has been collected at the southern boundary of the plant. Presently, a total of five on-site and one off-site unconsolidated unit recovery wells are used to collect ground water. This ground water is pumped through an air stripper and subsequently treated at the plant waste water treatment facility. In 1993, a total of over 32 million gallons of ground water was collected and treated (O'Brien & Gere, 1994);

- In 1988, shallow bedrock ground water recovery and treatment was initiated in wells GM-8DR and GM-11D. A plan to upgrade the bedrock ground water recovery system was approved by NYSDEC and implemented in 1990;

- Since 1992, several upgrades to the Fort Edward plant waste water treatment facility have been implemented to reduce effluent loading to the Hudson River; and

- With the approval of NYSDEC and NYSDOH, GE undertook a voluntary residential well sampling and public water supply connection program in the areas south, east and west of the Fort Edward plant in 1994. As of the date of this writing, 30 homes and businesses in the Town of Fort Edward have been connected to public water at no charge to the owners.

- Removal of the former Outfall 004 pipeline from manhole MH-3 to the top of the river bank has been approved by NYSDEC as an IRM. The IRM is scheduled to be completed in early 1996.

2.3.1. Remedial Investigation/Feasibility Study

As discussed in Section 1.1, an Order was negotiated between GE and NYSDEC for development and implementation of an RI/FS at the site. O'Brien & Gere developed the following documents under the Order related to the RI/FS:

- Remedial Investigation/Feasibility Study Work Plan (O'Brien & Gere 1995a),
- Remedial Investigation Field Sampling Plan (O'Brien & Gere 1995b), and
- Quality Assurance Project Plan for the Remedial Investigation/Feasibility Study (O'Brien & Gere 1995c).

The RI/FS Work Plan was approved by NYSDEC and appended to the Order. The Field Sampling Plan and Quality Assurance Project Plan were approved by NYSDEC on August 14, 1995. O'Brien & Gere is currently conducting the RI.

2.3.2. Interim Remedial Measure

Concurrent with the RI, an IRM is being conducted at the site. O'Brien & Gere developed an IRM Work Plan entitled *Former Outfall 004 Pipeline Interim Remedial Measure Work Plan* (O'Brien & Gere, 1995d) which was approved by NYSDEC on September 15, 1995. The overall purpose of the IRM is to remove residual PCBs associated with the former Outfall 004 pipeline and to eliminate the former outfall pipeline as a preferential pathway (or conduit) for ground water flow toward the Hudson River and into deeper ground water units. The IRM includes removal and off-site disposal of soil and pipe bedding containing PCBs in excess of 25 mg/kg (wet weight basis) and management of construction water associated with excavation activities.

In addition to the IRM Work Plan, O'Brien & Gere developed the following document related to the IRM:

- Former Outfall 004 Pipeline Interim Remedial Measure Project Technical Specifications and Contract Drawings, (O'Brien & Gere, 1995e).

Remedial construction is expected to begin in the fourth quarter of 1995 and be completed in the first quarter of 1996.

The IRM will be considered during performance of the FS. For those sources addressed by the IRM, the effectiveness of measures performed and the need for further action will be evaluated in the FS.

3. Feasibility Study

3.1. Objective

The objective of the FS is to develop, screen and evaluate remedial alternatives for the site so as to present sufficient information for decision makers to compare alternatives and select a remedy. Conduct of the FS will be in accordance with the NYSDEC revised TAGM on *Selection of Remedial Actions at Inactive Hazardous Waste Sites* (NYSDEC 1990), the provisions of CERCLA as amended by the Superfund Amendments and Reauthorization Act (SARA), the NCP (NCP 1990), and USEPA's *Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA* (USEPA 1988).

3.2. Task 1 - Development of Remedial Action Objectives

The first step in the FS is the development of remedial action objectives (RAOs). RAOs identify the contaminants and media of interest, pathways of exposure, and preliminary remediation goals. RAOs are developed based on potentially applicable or relevant and appropriate standards, criteria, and guidelines (SCGs) given the conditions at the site, and public health and environmental concerns identified in the risk assessment (RA).

The identification of SCGs is an iterative process which continues throughout the RI/FS. A preliminary identification of SCGs is presented in Section 4 of this Work Plan. SCGs shall be identified and altered throughout the RI/FS as a better understanding of site conditions, contaminants, and remedial action alternatives is gathered.

The RA for this site will be performed in accordance with an RA Work Plan to be submitted for NYSDEC review and approval. During RAO development, consideration will be given to potential exposure pathways and risks identified in the RA.

3.3. Task 2 - Development of Alternatives

The next step in the FS is the development of alternatives. The objective of the development of alternatives is to identify, in a manner consistent with the above-referenced regulations, a range of remedial alternatives

that are reflective of appropriate waste management options and which are protective of public health and the environment.

3.3.1. Development of General Response Actions

The first step in the development of alternatives is the development of general response actions. General response actions are media-specific actions (*e.g.*, containment, treatment, disposal) which satisfy the RAOs.

3.3.2. Identification of Volumes or Areas of Media

In the second step of the development of alternatives, the volumes or areas of contaminated media are identified based on the site conditions defined by the RI, the nature and extent of contamination, potential exposure routes, and the level of protectiveness specified by the RAOs.

3.3.3. Identification and Screening of Remedial Technologies and Process Options

The third step for the development of alternatives is the identification and screening of remedial technologies and process options. Remedial technology types and process options for each general response action which address the RAOs are identified and screened on the basis of technical implementability. Site contaminant information and physical characteristics are used to evaluate the technical feasibility of identified process options. Infeasible process options are not considered further in the FS. It is at this stage of the FS that the broad realm of potentially applicable remedial technology process options are identified, including innovative technologies.

3.3.4. Evaluation of Process Options

The fourth step in the development of alternatives is the evaluation of process options. Each of the process options remaining after the initial screening is evaluated in greater detail based on the following criteria:

- Effectiveness The evaluation of effectiveness addresses the potential effectiveness of process options in handling the estimated areas or volumes of contaminated media and meeting the pertinent RAOs, the effectiveness of process options in protecting human health and the environment during construction and implementation, and how proven and reliable the process options are in relation to site conditions.

- Implementability Implementability includes the technical and administrative feasibility of implementing a process option under such institutional constraints as the availability of treatment, storage, and disposal services, special permitting requirements, and the need and availability of equipment and skilled workers.

- Cost Both the capital and operation and maintenance costs of each process option are evaluated qualitatively (*i.e.*, high, medium, or low) relative to the other process options of each technology type.

3.3.5. Assembly of Remedial Alternatives

The fifth and final step of the development of alternatives is the assembly of remedial alternatives. General response actions and technology process options which passed the screening are assembled into alternatives such that each RAO is addressed. The alternatives are developed to represent a range of treatment and containment combinations. For source control actions, a range of alternatives is developed which attain site-specific remediation levels within varying time frames using one or more technologies. In addition, a no action alternative is developed in accordance with CERCLA guidance to provide a baseline for comparison to other alternatives. The assembled remedial alternatives are then screened as detailed in the following section. The results of the development of alternatives are documented in the FS Report.

3.4. Task 3 - Screening of Alternatives

The next phase of the FS is the screening of alternatives. The objective of this task is to screen the remedial alternatives which were developed during the development of alternatives, such that a refined range of the most promising alternatives is produced. The intent of this task is to reduce the range of alternatives to a manageable number prior to the detailed analysis of alternatives. This task can often be eliminated if the number of alternatives generated during the development of alternatives is reasonable.

If performed, three basic steps are involved in the screening of alternatives. The first step involves the refinement of the alternatives as appropriate by incorporating updated information generated in the RI. Step two requires that the alternatives be screened based on effectiveness, implementability, and cost considerations. Lastly, a decision is made as to which alternatives should receive further consideration.

The following criteria are utilized for the screening of remedial alternatives:

- Effectiveness This particular criterion relates to the protectiveness an alternative would provide for human health and the environment, both in the short-term and long-term, and the reductions in toxicity, mobility, or volume it would achieve. Alternatives which result in a permanent reduction in the toxicity, mobility, or volume of hazardous constituents shall be considered more effective than those that do not accomplish permanent reductions. Those alternatives which would result in an increase in the toxicity, mobility, or volume of hazardous constituents are no longer considered.

- Implementability This criterion involves the technical and administrative feasibility of implementing the remedial alternative. Technical feasibility involves the ability to construct, operate, and maintain the alternative, as well as monitoring of technical components of an alternative. Administrative feasibility refers to the ability to obtain approvals; the availability of treatment, storage, and disposal services; and the requirements for and availability of specific equipment and specialists.

- Cost Cost estimates are developed for each of the alternatives. The cost estimates include capital, operation and maintenance, and present worth costs. An alternative whose cost far exceeds that of other alternatives which provide similar results is eliminated from further consideration. Cost is not used as the sole deciding factor when comparing alternatives which provide different health or environmental results.
  If any of the alternatives require the acquisition of additional data in order to be evaluated, such as treatability data, such data shall be generated at this time.

The next section of this Work Plan outlines the detailed analysis required for remedial alternatives with favorable evaluations. The alternatives selected for further analysis should preserve, to the extent possible, the range of treatment and containment alternatives initially developed. Alternatives with one or more innovative treatment technologies are carried through to the detailed analysis if there is a reason to believe that they offer potential for better treatment performance or implementability, fewer or lesser adverse impacts than other available approaches, or lower

costs for similar levels of performance than demonstrated treatment technologies.

The process involved in the screening of alternatives, as well as the rationale for eliminating any alternatives during this screening process, is documented in the FS Report.

3.5. Task 4 - Detailed Analysis of Alternatives

The aim of this task is to evaluate the most promising remedial alternatives in greater detail so as to provide the basis for selection of a remedy. The detailed evaluation includes a technical and statutory assessment and a cost analysis, as presented below. Prior to the evaluation of alternatives, a detailed description of each alternative is prepared, including any refinements to the alternatives resulting from the acquisition of additional data. The alternatives shall be evaluated based on specific regulatory requirements; technical, cost and institutional considerations; and community and support agency acceptance. The detailed evaluation consists of an individual assessment of each alternative versus the evaluation criteria described in Section 3.5.1 and a comparative analysis identifying the relative performance of each alternative against the criteria.

3.5.1. Individual Analysis of Alternatives

During the individual analysis of alternatives, each remedial alternative is evaluated with respect to the nine criteria described as follows.

Overall Protection of Human Health and the Environment The analysis of each alternative with respect to overall protection of human health and the environment provides an evaluation of whether each alternative achieves and maintains adequate protection of human health and the environment and the details of how site risks are eliminated, reduced, or controlled through treatment, engineering, or institutional controls.

Compliance with SCGs Each alternative is evaluated to determine whether it would attain SCGs. If an alternative does not attain SCGs, a rationale for invoking a waiver is submitted.

Long-Term Effectiveness and Permanence The evaluation of long-term effectiveness and permanence shall address the magnitude of residual risk remaining at the site after alternative implementation from untreated material or treatment residuals and the adequacy and reliability of

controls used to manage untreated materials or treatment residuals. The magnitude of residual risks remaining after the implementation of a remedial alternative is assessed in terms of the amounts and concentrations of the remaining hazardous materials, considering the persistence, toxicity, and mobility of the hazardous substances. Long-term management controls include engineering controls (*e.g.*, containment technologies), institutional controls, monitoring, and operation and maintenance. The potential need for future replacement of the remedy is also evaluated.

Reduction of Toxicity, Mobility, or Volume through Treatment The degree to which the alternatives employ treatment that reduces toxicity, mobility or volume of the hazardous materials is evaluated. The following factors shall be considered:

- The treatment technologies utilized and the materials they would treat.
- The amount of hazardous materials that would be destroyed or treated.
- The expected degree of reduction in toxicity, mobility, or volume of the hazardous materials.
- The degree to which treatment is irreversible.
- The type and quantity of residuals that would remain following treatment of hazardous materials. This includes consideration of the persistence, toxicity, and mobility of the residuals.

Short-Term Effectiveness The short-term effectiveness of each alternative shall be evaluated with respect to the protection of workers and the community during construction and implementation of the alternative, environmental effects resulting from implementation of the alternative, and the time required to achieve remedial objectives.

Implementability The ease or difficulty of implementing each alternative is evaluated. The following factors shall be considered:

- The degree of difficulty in constructing the technologies associated with the alternative.
- The expected reliability of the technologies associated with the alternative.

- The need to coordinate with or obtain permits and approvals from government agencies in order to implement the alternative.
- The availability of necessary equipment and specialists.
- The available capacity and location of treatment, storage and disposal services necessary for implementation.
- The availability of prospective technologies that are under consideration.
- The ability to monitor the effectiveness of the remedy.
- The ease of undertaking additional remedial actions, if required.

Cost A detailed cost estimate is developed for each remedial alternative. Costs that are evaluated include the following:

- Capital costs.
- Operation and maintenance costs.
- Present worth of capital costs and operation and maintenance costs.

Community Acceptance Community positions on specific alternatives that are documented during preparation of the RI/FS are addressed during the detailed analysis of alternatives. Community acceptance is further documented in the Record of Decision (ROD) by NYSDEC following a public comment period.

Regulatory Acceptance Regulatory acceptance is addressed in the ROD following the public comment period.

3.5.2. Comparative Analysis of Alternatives

Following the individual analysis of alternatives, a comparative analysis is performed. For each of the nine criteria, the degree to which each remedial alternative meets the criteria relative to the other alternatives is evaluated.

3.5.3. Recommendations

One alternative is identified which is preferred over the others based on the results of the evaluations. The preferred alternative is one which is protective of human health and the environment, cost-effective, and complies with pertinent regulatory requirements. The recommended alternative, as well as the individual and comparative analyses, is documented in the FS Report.

3.6. Task 5 - Feasibility Study Report

The objective of this task is to compile the results of the FS. The FS Report is prepared for NYSDEC review and approval. The following format is used to complete the FS Report:

- Introduction
- Site Data Summary
- Development of Alternatives
- Screening of Alternatives
- Detailed Analysis of Alternatives
- Conclusions and Recommendations
- Conceptual Design
- References
- Tables
- Figures
- Appendices

4. Preliminary Identification of Potentially Applicable Standards, Criteria and Guidelines (SCGs)

In accordance with the RI/FS Work Plan (O'Brien & Gere 1995a), a preliminary review of the potentially applicable SCGs for the site has been performed. SCGs are classified as chemical-specific, location-specific, or action-specific. Chemical-specific SCGs are health- or risk-based numerical values or methodologies which, when applied to site-specific conditions, result in the establishment of numerical values. These values establish the acceptable amount or concentration of a chemical that may be found in, or discharged to, the ambient environment. Location-specific SCGs set restrictions on activities based on the characteristics of the site or immediate environs. Action-specific SCGs set controls or restrictions on particular types of actions related to management of hazardous substances, pollutants, or contaminants.

Review of SCGs is revisited during the development of RAOs, as discussed in Section 3.2 and during the detailed analysis of alternatives, as discussed in Section 3.5.1. The following have been identified as potentially applicable SCGs:

- Toxic Substances Control Act (TSCA) Regulations
  - 40 CFR 761 - Polychlorinated Biphenyls (PCBs) Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions
- New York State Hazardous Waste Regulations
  - 6 NYCRR Part 364 Waste Transporter Permits
  - 6 NYCRR Part 371 Identification and Listing of Hazardous Wastes
  - 6 NYCRR Part 372 Hazardous Waste Manifest System and Related Standards for Generators, Transporters, and Facilities
  - 6 NYCRR Part 373 Hazardous Waste Treatment, Storage, and Disposal Facility Requirements
  - 6 NYCRR Part 376 Land Disposal Restrictions

- New York State Water Quality Regulations
  - 6 NYCRR Parts 700-705 Water Quality Regulations for Surface Waters and Groundwaters
- State Pollutant Discharge Elimination System (SPDES)
  - 6 NYCRR Part 750-757 NYS SPDES Regulations
- New York State Air Quality Standards and Emission Limits
  - 6 NYCRR Part 257 Air Quality Standards
  - 6 NYCRR Part 212 General Process Emission Sources
- Resource Conservation and Recovery Act Regulations
  - 40 CFR Part 260 General - Definitions and Delisting Procedures
  - 40 CFR Part 261 Identification and Listing of Hazardous Waste - Definition of Solid/Hazardous Waste; Recycling; Small Quantity Generators
  - 40 CFR Part 262 Generator Standards
  - 40 CFR Part 263 Transporter Standards
  - 40 CFR Part 264 Final Permit Standards for Treatment, Storage, and Disposal Facilities
  - 40 CFR Part 268 Land Disposal Restrictions
- Department of Transportation (DOT) Regulations
  - 49 CFR 172 Use of Hazardous Materials Tables and Communications
  - 49 CFR 173 Requirements for Shipping and Packaging
  - 49 CFR 174 Carriage by Rail
  - 49 CFR 177 Carriage by Public Highway
  - 49 CFR 178 Specifications for Packaging
  - 49 CFR 179 Tank Car Specifications
- Occupational Safety and Health Administration (OSHA) Regulations
  - 29 CFR 1910 General Industry Standards
  - 29 CFR 1926 Safety and Health Regulations for Construction

5. Project Schedule and Deliverables

5.1. Project Schedule

The FS will begin following NYSDEC approval of this FS Work Plan. The FS Report will be submitted to NYSDEC 90 calendar days following NYSDEC approval of the RI Report.

5.2. Project Deliverables

Project deliverables for the FS include:

- monthly progress reports, and
- feasibility study report.

The FS Report will be submitted for NYSDEC review and approval. Monthly progress reports will be submitted by the 10th day of each month, as specified in the Order.

6. References

Dames & Moore, Inc., 1976(a), Geohydrologic Investigations Impounding Basins, Fort Edward and Hudson Falls, New York, May 1976.

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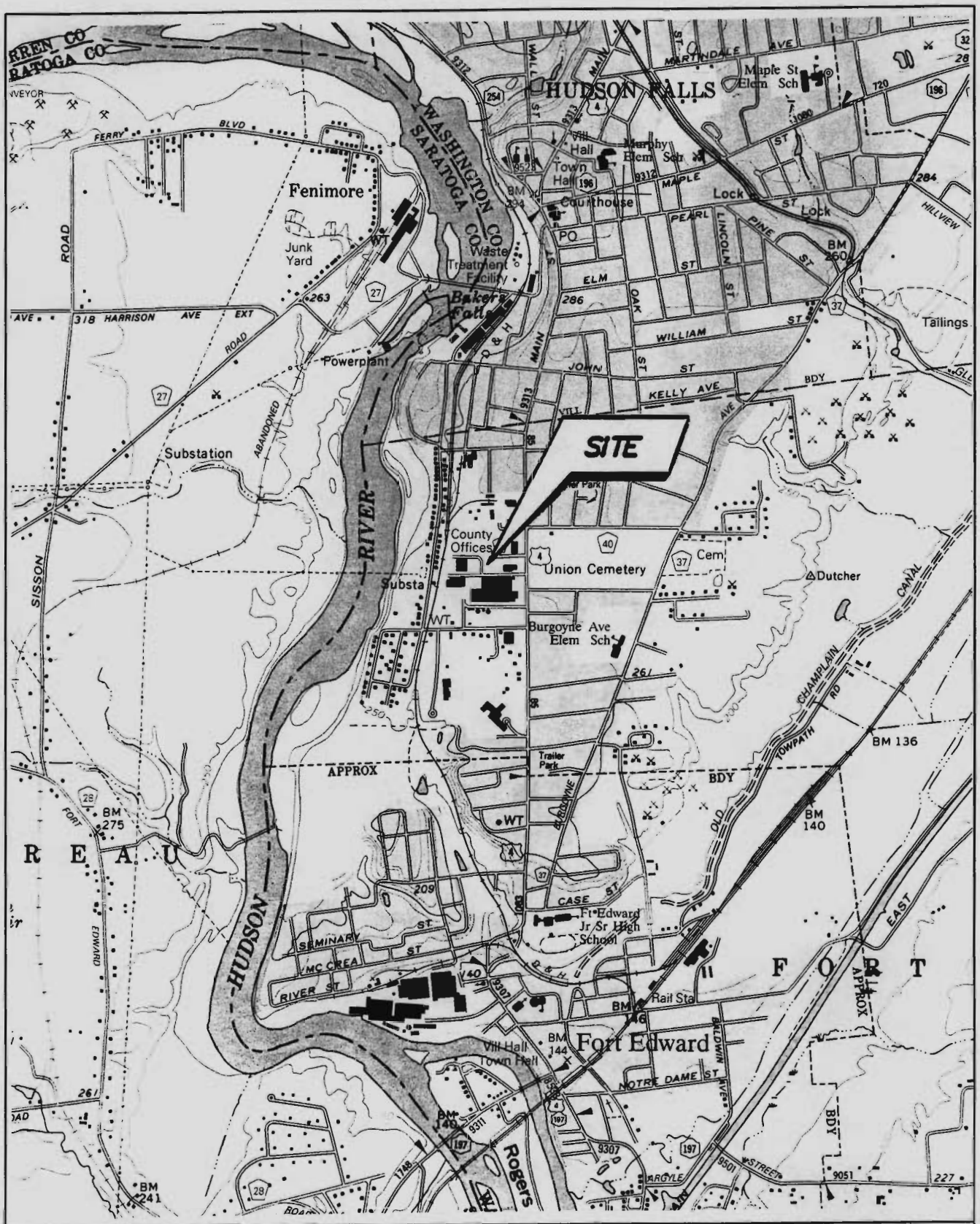
Figures



O'BRIEN & GERE ENGINEERS, INC.	SITE LOCATION MAP GENERAL ELECTRIC COMPANY FORT EDWARD, NEW YORK	FILE NO. 5731.000 DATE. APR 1995 FIGURE 2-1

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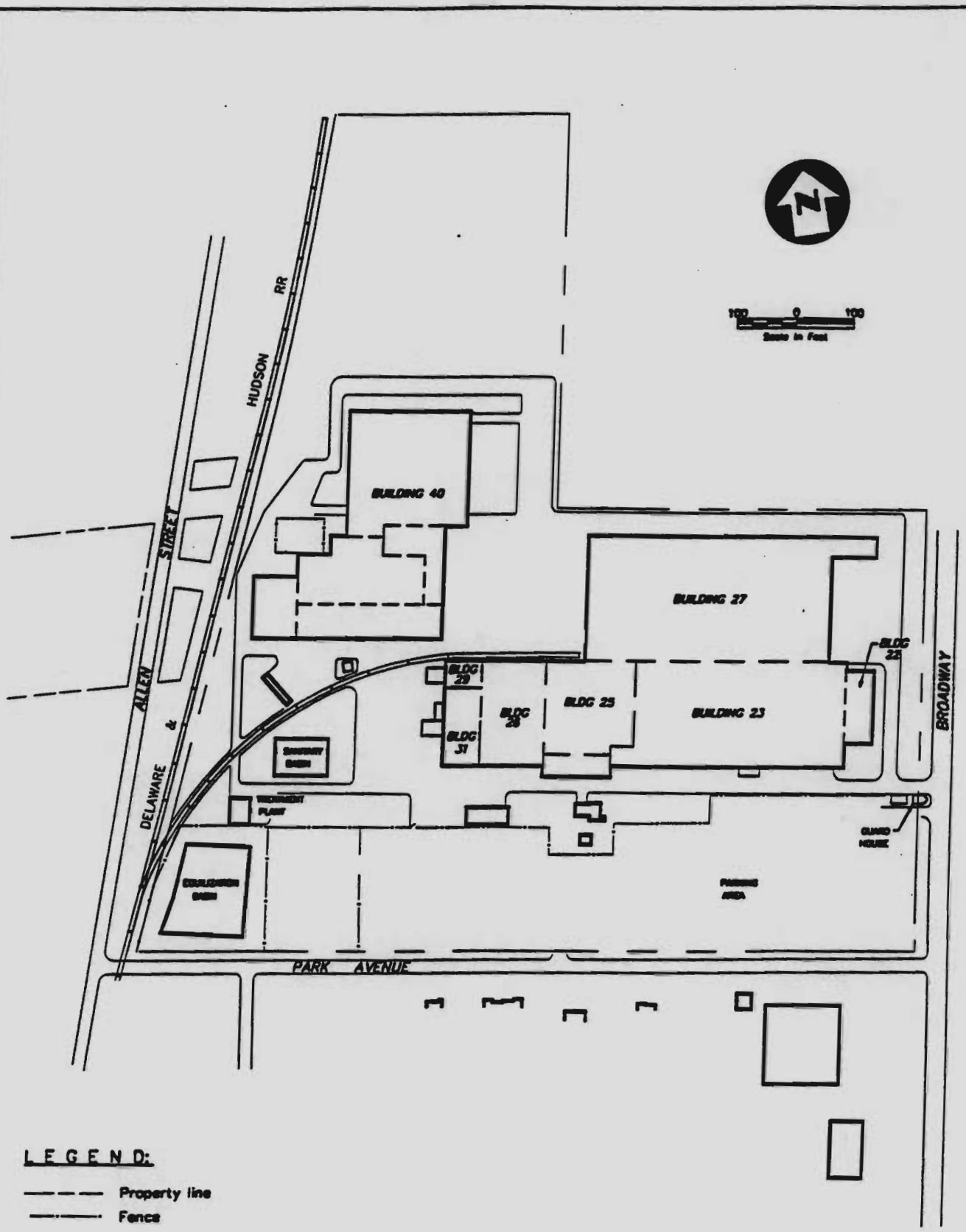

O'BRIEN & GERE ENGINEERS, INC.

SITE PLAN

GENERAL ELECTRIC COMPANY
FORT EDWARD, NEW YORK

FILE NO. 5731.009

DATE. SEP 1994

FIGURE 2-2

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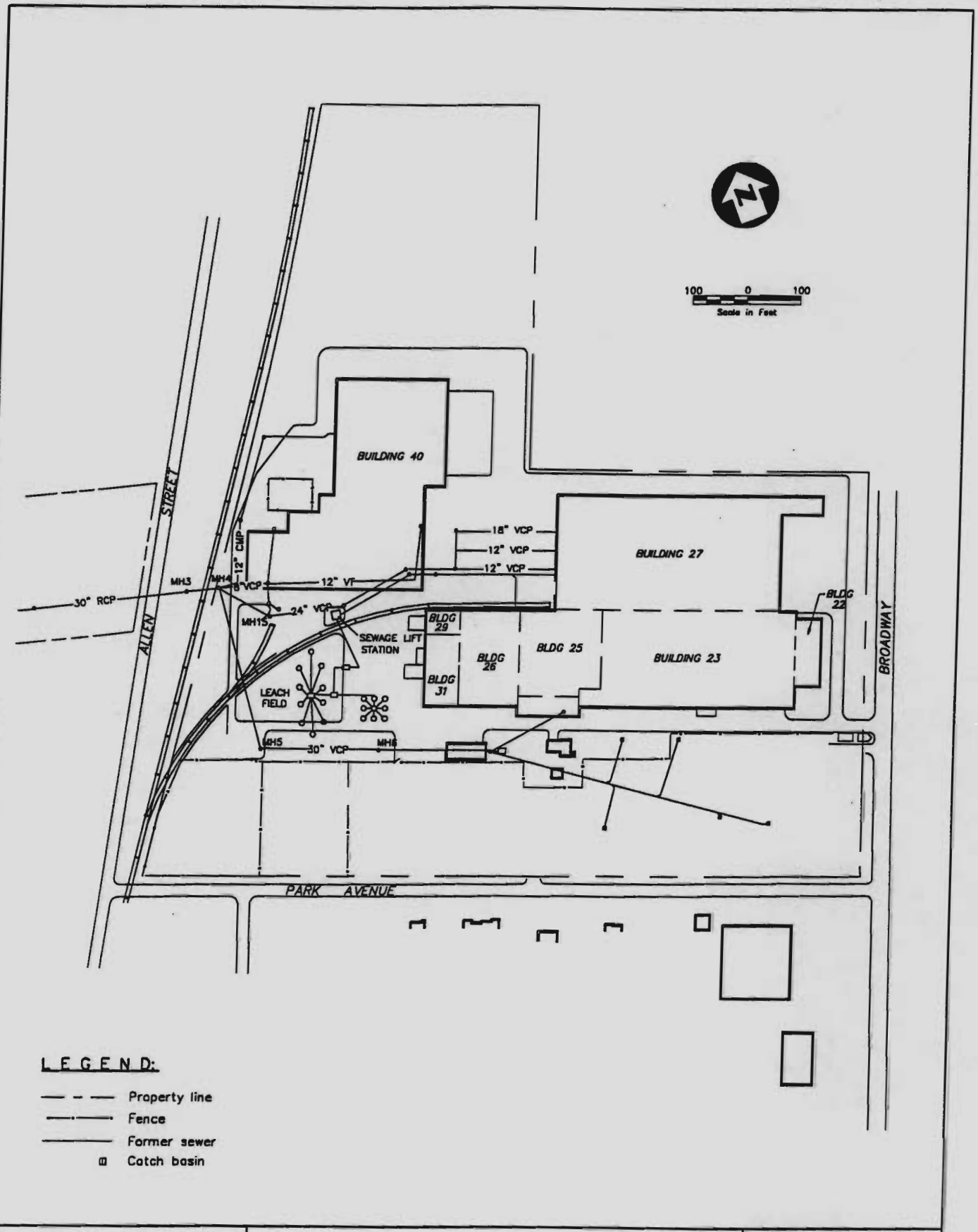

O'BRIEN & GERE ENGINEERS, INC.

PRE-1976 WASTE WATER MANAGEMENT

GENERAL ELECTRIC COMPANY
FORT EDWARD, NEW YORK

FILE NO. 5731.009

DATE. SEP 1994

FIGURE 2-3

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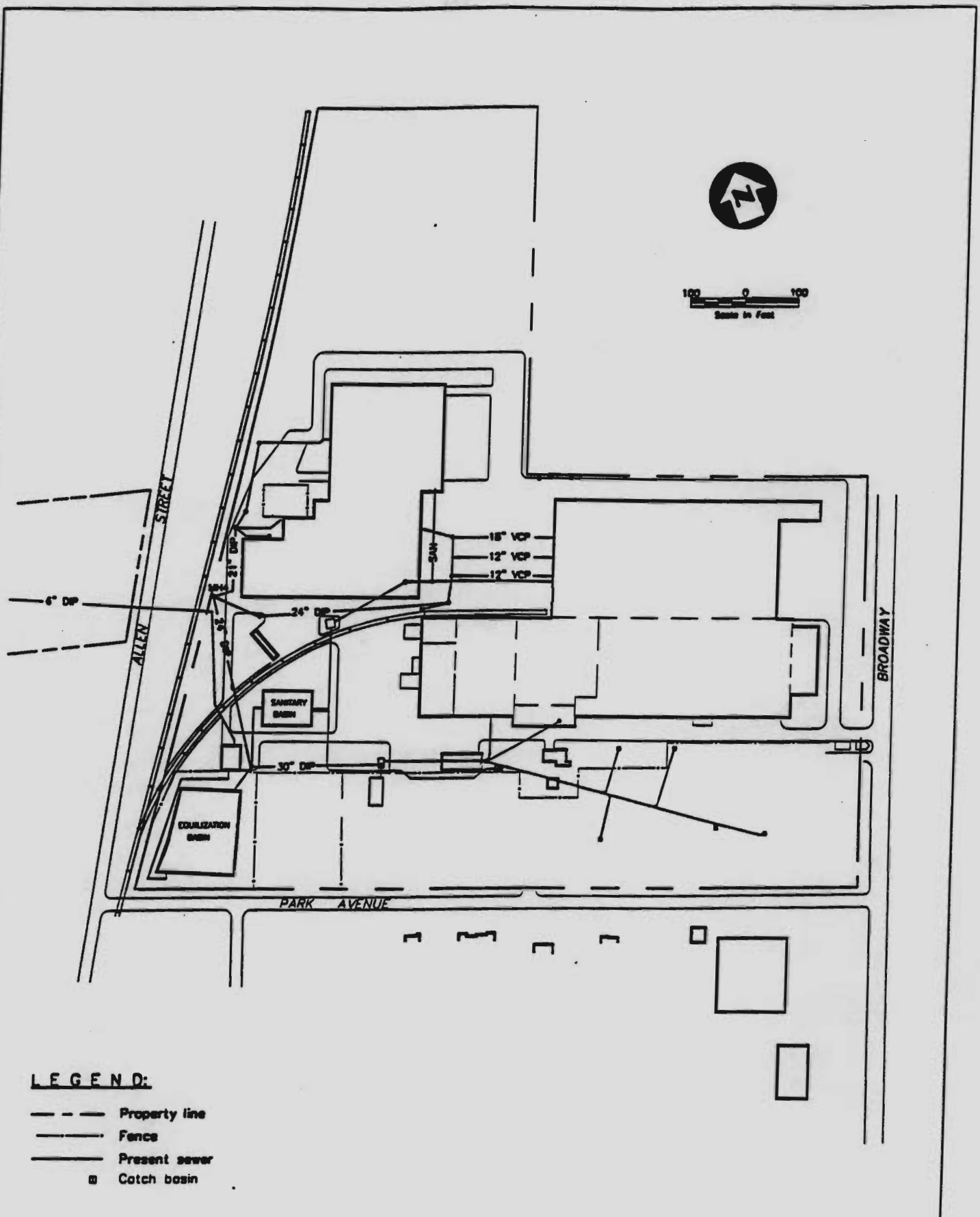

O'BRIEN & GERE ENGINEERS, INC.

PRESENT WASTE WATER MANAGEMENT

GENERAL ELECTRIC COMPANY
FORT EDWARD, NEW YORK

FILE NO. 5731.009

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FIGURE 2-4