

EXHIBIT C SCOPE OF WORK AND SCHEDULE

- A. GE shall conduct a final cleanup at the Site by implementing the Modified Alternative 2 remedy under the CAP, Exhibit B, in accordance with the following requirements:
1. Until such time as the Operation and Maintenance plan for the vapor intrusion mitigation (VIM) system is approved by Ecology in the EDR and implemented by GE, GE shall continue to operate and maintain the VIM system located at the 220 South Dawson Street building in accordance with the Ecology contingent approved Final Engineering Report – Vapor Intrusion Mitigation System, Sections 6.0 through 6.1, Operation and Maintenance, dated October 2007, as modified by the Ecology letters dated December 4, 2007 and March 7, 2011. Refer to Exhibit G. GE shall be responsible for ensuring that the VIM system operates as designed and constructed in the Final Engineering Report –Vapor Intrusion Mitigation System and subsequently modified as described in the May 28, 2009 VIMS modification memorandum. The requirements of the VIM system Operation and Maintenance plan in the approved EDR will replace the requirements of this paragraph upon the implementation of such plan.
 2. Until such time as groundwater monitoring plans, a Quality Assurance Project Plan (QAPP), and Standard Operating Procedures (SOPs), are approved by Ecology in the EDR and implemented by GE, GE shall implement hydraulic and chemical monitoring of groundwater in accordance with the Schedule in Exhibit H, in accordance with the procedures and reporting requirements found in the Ecology-approved Groundwater Sampling and Analysis Plan, Revision 1 and Quality Assurance Project Plan, dated February 2008 in Exhibit H, and in accordance with the quality assurance procedures found in the Ecology-approved QAPP and SOPs in Exhibit H. GE shall submit quarterly groundwater monitoring reports to Ecology within 60 days after completing the sampling event. In addition, GE shall include a short summary of the data validation results from both its contractor laboratory and ENSR. This summary shall be included in the main discussion section of each quarterly groundwater monitoring report and include at a minimum: a discussion of any discrepancies, unusual results, data rejected, and reasons for the data being rejected, and a discussion of any data qualified and the reason for the data qualification. The requirements of the groundwater monitoring plans, QAPP, and SOPs, in the approved EDR will replace the requirements of this paragraph upon the implementation of such plans.
 3. Until such time as the EDR is approved by Ecology and implemented by GE, or another Ecology directive requires or provides for modification or shut down of the ground water extraction system, the facility ground water extraction system will remain operational under the following conditions: (a) GE shall use best efforts to maintain the design groundwater and extraction rate of 10 gallons per

minute (gpm) at RW-3 and 6 gallons per minute at RW-2, and GE will operate the groundwater extraction system in accordance with the Operation & Maintenance Plan, dated March 2010 and approved by Ecology's letter dated March 25, 2010 attached as Exhibit I; (b) GE will not abandon ground water extraction well RW-1 in case Ecology decides it should be operational in the future based on the effectiveness of the overall ground water extraction system or if required as part of the final remedy; and (c) in the event that construction activities or other requirements of the current owner at the Site preclude the operation of all or a part of the ground water extraction system, GE will provide written notice of the construction impacts or requirements to Ecology within 15-calendar days of first being aware of this change. The ground water extraction system requirements in the approved EDR will replace the requirements of this paragraph upon the implementation of the EDR.

4. GE shall submit a draft Engineering Design Report (EDR), Construction Plans and Specifications (CPS), and Operation and Maintenance Plans (OMP) which meet the requirements of WAC 173-340-400 and the Ecology CAP, Section 6.0 paragraph 1, in accordance with the List and Schedule of Deliverables below. GE shall include in the EDR an implementation schedule that includes a critical-path Gantt chart timeline showing anticipated dates and timeframes for all post-CAP deliverables and cleanup action elements. GE shall revise the draft EDR/CPS/OMP to address all Ecology comments in accordance with the List and Schedule of Deliverables below. GE shall begin construction and implementation of the cleanup action in accordance with the Ecology approved EDR/CPS/OMP in accordance with the List and Schedule of Deliverables below.
5. GE shall submit a draft engineering as-built report per the List and Schedule of Deliverables below. GE shall revise the draft engineering as-built report to address all Ecology comments in accordance with the List and Schedule of Deliverables below.
6. As part of the EDR submitted to Ecology for review and approval, GE shall propose optimized groundwater extraction rates for operating the groundwater recovery wells in the current locations in accordance with the Ecology CAP, Section 6.0 paragraph 2.
7. Relocation of Optimized Hydraulic Control System: As part of the EDR, GE shall submit for Ecology's review and approval a work plan that discusses the timing and relocated optimized hydraulic control system in accordance with the Ecology CAP, Section 6.0 paragraph 3, including the final pumping rate, well locations, and the phased timing and specific details of the abandonment and replacement of the hydraulic control system as ISCO injections proceed from the east end of the alley to the west end.

8. GE shall submit work plans for Ecology review and approval to perform Phase 1, Phase 2, Phase 3, and all other additional ISCO injection phases described in the Ecology CAP, Section 6.0 paragraphs 4, 7, 9 and 11, in accordance with the List and Schedule of Deliverables below. GE shall address all Ecology comments into a revised report for Ecology review and approval in accordance with the List and Schedule of Deliverables below.
9. Prior to conducting Phase 1, GE shall submit as part of the EDR, a work plan to collect baseline data as described in the Ecology CAP, Section 6.0 paragraph 4 and 5.
10. After completion of the Phase 1 small scale ISCO treatment, Phase 2 full scale ISCO treatment, Phase 3 full-scale treatment, and any additional Ecology required ISCO treatments, GE shall submit an ISCO treatment and performance monitoring summary report, as described in the Ecology CAP, Section 6.0 paragraphs 6, 8, 10, and 12, to Ecology for review and approval in accordance with the List and Schedule of Deliverables below. GE shall address all Ecology comments into a revised report for Ecology review and approval in accordance with the List and Schedule of Deliverables below.
11. In accordance with the Ecology CAP, Section 6.0 paragraph 14, and the List and Schedule of Deliverables below, GE shall submit the groundwater potability analysis to Ecology four years and six months after the consent decree is originally signed by the Court or after Ecology issues an alternative administrative order, and thereafter every five years from the date the first report is due. Additionally, within 60 calendar days of an Ecology written request for a potability analysis, GE shall submit such analysis to Ecology for review and approval. GE is required to continue these reports in accordance with this schedule until MTCA Method B potable groundwater cleanup standards are attained at the Site.
12. In accordance with the Ecology CAP, Section 6.0 paragraph 14, and the List and Schedule of Deliverables below, GE shall submit to Ecology for review and approval, a plan to perform routine follow-up notifications with on- and off-property owners and tenants to ensure that the institutional controls are understood and upheld. GE shall implement the Ecology approved plan.
13. In accordance with the Ecology CAP, Section 6.0 paragraph 15, at any time after the completion of the bench scale test, small scale ISCO treatment, and two full scale ISCO treatments (after Phase 3), GE may submit to Ecology for review and approval a work plan proposing to turn off one or more pumps. GE shall base its analysis in the work plan on all site data available at the time of

the submission. If Ecology approves the work plan to turn off one or more pumps, then GE shall implement said work plan in accordance with its terms. If Ecology does not approve the work plan, GE shall continue to operate all of the groundwater extraction wells in accordance with the Ecology CAP until Ecology determines that groundwater cleanup standards are met based on ISCO treatment and performance monitoring.

14. Monitoring

GE shall implement monitoring in accordance with WAC 173-340-410. GE shall submit the following detailed monitoring work plans as part of the EDR (or as an addendum to the EDR, as specified) in accordance with the Ecology CAP, Section 6.0 paragraph 16, and the List and Schedule of Deliverables below:

Protection Monitoring: GE shall submit a protection monitoring plan as part of the EDR to Ecology for review and approval. GE shall implement the Ecology approved protection monitoring plan.

Performance Monitoring: The EDR submitted to Ecology for review and approval shall contain the performance monitoring plan as part of the Phase 1 ISCO treatment and monitoring plan. GE shall submit subsequent phase 2, 3 (and for any additional phases) performance monitoring plans as part of those phased ISCO treatment and monitoring plans, as addendums to the EDR. GE shall implement the Ecology approved performance monitoring plan.

Confirmation Monitoring: When Ecology determines that cleanup standards are achieved without further ISCO treatment, GE shall submit the confirmation monitoring plan for review and approval as an addendum to the EDR. GE shall address all Ecology comments into a revised work plan for Ecology review and approval in accordance with the List and Schedule of Deliverables, below. GE shall implement the Ecology approved confirmation monitoring plan.

List and Schedule of Deliverables

Milestone/Deliverable	Due/End date	Duration
Draft Bench Scale Testing Work Plan and Schedule	GE shall submit within 45 days following Ecology approval of the Cleanup Action Plan (CAP).	
Implement Bench Scale Testing	GE shall initiate implementation of the bench scale testing within 45 days following approval of the Work Plan.	

Bench Scale Testing Report	GE shall submit within 45 days following finalization of the bench scale testing.	
Draft Engineering Design Report (EDR/CPS/OMP)	GE shall submit within 90 days following Ecology approval of the bench scale testing report.	
Draft Revised EDR/CPS/OMP which addresses Ecology's comments	GE shall submit within 45 days following receipt of Ecology comments on the draft EDR/CPS/OMP. GE shall revise the EDR/CPS/OMP per Ecology comments.	
Construction and implementation per detailed EDR schedule (phase 1 ISCO treatment)	GE shall initiate construction and implement the EDR/CPS/OMP within 60 days following approval of Final EDR/CPS/OMP.	Per EDR schedule
Institutional controls per the approved EDR and its schedule	GE shall complete implementation of institutional controls within one year following finalization of the EDR.	Until Ecology determines institutional controls are no longer needed at the Site.
Draft phase 1 ISCO treatment and performance monitoring report	GE shall submit within 45 days after Ecology determines that phase 1 work is complete.	
Draft phase 2 ISCO treatment and performance monitoring plan (EDR addendum)	GE shall submit within 60 days after Ecology written approval of the phase 1 ISCO treatment and performance monitoring report.	
Implement phase 2 ISCO treatment and performance monitoring work plan	GE shall initiate implementation within 60 days after Ecology written approval of the phase 2 ISCO treatment and performance monitoring work plan.	
Draft phase 2 ISCO treatment and performance monitoring report	GE shall submit within 45 days after Ecology determines that phase 2 work is complete.	
Draft phase 3 ISCO treatment and performance monitoring plan (EDR addendum)	GE shall submit within 60 days after Ecology written approval of the phase 2 ISCO treatment and performance monitoring report.	
Implement phase 3 ISCO treatment and performance monitoring work plan	GE shall initiate implementation within 60 days after Ecology written approval of the phase 3 ISCO treatment and performance monitoring work plan.	
Draft phase 3 ISCO treatment and performance monitoring report	GE shall submit within 45 days after Ecology determines that phase 3 work is complete.	
Additional ISCO treatment and performance monitoring plans (EDR addendum)	GE shall submit within 60 days after Ecology written notice if Ecology determines that cleanup standards are not met.	
Implement additional phase ISCO treatment and performance monitoring work plan	GE shall initiate implementation within 60 days after Ecology written approval of the additional phase ISCO treatment and performance	

	monitoring work plan.	
Draft ISCO treatment and performance monitoring reports (subsequent to phase 3 if required by Ecology)	GE shall submit within 45 days after Ecology determines that each applicable phase of ISCO work is completed.	
Revised phased ISCO treatment and performance monitoring work plans and reports.	GE shall submit within 45 days following receipt of Ecology comments on each respective draft work plan and report. GE shall revise the work plans and reports per Ecology comments.	
Draft As-built Report	GE shall submit per the schedule in the Ecology approved EDR.	
Revised Final As-Built Report	GE shall submit within 45 days following receipt of Ecology's comments on the draft As-built Report. GE shall revise the As-built Report per Ecology comments.	
Protection Monitoring	GE shall initiate implementation of protection monitoring within 60 days after monitoring plan in the EDR is approved by Ecology.	Until Ecology determines that protection monitoring is no longer required.
Performance Monitoring	GE shall implement immediately after phased ISCO injections are complete. Each phase of the ISCO treatment will have a specified performance monitoring plan.	Until Ecology determines that performance monitoring is complete.
Draft Confirmation Monitoring Work Plan	GE shall submit within 60 days after Ecology written request.	
Revised Confirmation Monitoring Work Plan	GE shall submit within 45 days following receipt of Ecology comments on the draft work plan. GE shall revise the work plan per Ecology comments.	
Confirmation Monitoring	GE shall initiate implementation of approved Confirmation Monitoring Work Plan within 30 days after Ecology determines that performance monitoring is complete.	Until Ecology determines that residual hazardous substance concentrations no longer exceed site cleanup levels.
Other Deliverables	Unless otherwise stated, GE shall resubmit revised deliverables per all Ecology comments within 45 days.	