



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

July 11, 2007

Mr. Dean Tagliaferro
EPA Project Coordinator
United States Environmental Protection Agency
c/o Weston Solutions, Inc.
10 Lyman Street
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
Former Oxbow Areas J and K (GEC420)
Summary of May 2007 Inspection Activities**

Dear Mr. Tagliaferro:

On May 29, 2007, the General Electric Company (GE) performed its second post-remediation inspection of the properties within Former Oxbow Areas J and K at which remediation activities have been performed. As shown on Figure 1, Former Oxbow Areas J and K include six commercial parcels (four of which have recreational areas within them), three recreational parcels, and two residential parcels. In accordance with GE's *Addendum to Final Removal Design/Removal Action Work Plan for Former Oxbow Areas J and K* (Final RD/RA Work Plan Addendum), which was submitted to the U.S. Environmental Protection Agency (EPA) in April 2006 and conditionally approved by EPA on June 23, 2006, GE conducted remediation activities at all six of the commercial parcels (Parcels K10-13-1, K10-12-1, K10-11-1, K10-11-2, K10-11-3, and K10-11-5) and one residential property (Parcel K10-10-6). These remediation activities were completed in summer 2006. Vegetation restoration activities were subsequently conducted at these properties in accordance with the revised Vegetation Restoration Plan for Former Oxbow Areas J and K, provided in Attachment 2 to GE's October 5, 2006 Addendum to Supplemental Information Package.

GE conducted the initial post-remediation inspection of these properties on November 1, 2006. A summary of the November 2006 inspection activities was submitted to EPA in a letter dated January 3, 2007. On May 29, 2007, GE conducted the second post-remediation inspection of these properties in accordance with the Post-Removal Site Control Plan contained in Attachment E to GE's Final RD/RA Work Plan, as revised and set forth in Attachment G to the Final RD/RA Work Plan Addendum. Consistent with the initial inspection, this inspection was performed for areas that were backfilled and restored during implementation of the remediation actions.

Summary of Inspection Activities

The May 2007 inspection consisted of visual observations of the backfilled/restored areas, focusing on the following: (a) erosion controls to verify their continued effectiveness until such time as vegetation is sufficiently established; (b) any areas where excessive settlement has occurred relative to the surrounding areas; (c) any drainage or growth problems due to possible over-compaction of backfill materials; and (d) other conditions that could jeopardize the completed remediation. The inspection also evaluated whether the vegetation that has been planted or seeded is growing as anticipated and providing the desired degree of erosion control.

The May 2007 inspection also included observations of properties/areas at which the need for follow-up activities had been identified during the prior inspection. As indicated in GE's January 3, 2007 report related to the November 2006 inspection, follow-up activities included: plantings trees/shrubs at Parcels K10-11-5 and K10-10-6; repairing ruts and tracks resulting from recreational vehicles observed on undeveloped Longview Terrace (adjacent to Parcel K10-12-1), Parcel K10-11-3, and Parcel K10-11-5; and checking haybales previously placed along the swale on Parcel K10-11-2 to minimize erosion. As indicated in the January 3, 2007 report, the remaining trees/shrubs were planted on Parcels K10-11-5 and K10-10-6 in November 2006. Since the May 2007 inspection, GE repaired the ruts and has determined that adequate vegetation has been established at the above referenced areas on the undeveloped Longview Terrace, Parcels K10-11-3 and K10-11-5. In addition, haybales along the swale on Parcel K10-11-2 are decomposing therefore, GE, with EPA's concurrence, has decided to leave them in place.

To document the results of the May 2007 inspection, GE completed an Inspection Summary and Checklist for each property subject to inspection. Copies of the completed forms are provided in Attachment A. These forms will also be used in the future to continue to document such inspections and track the completion of identified maintenance activities.

Summary of Observations During Inspection

In summary, as indicated on the attached forms, the May 2007 inspection identified the need to conduct the following maintenance activities:

- Scratch and seed the six-foot excavation area on Parcel K10-11-3 along East Street;
- Address erosion along the Housatonic river just east of Parcel K10-11-3 and along the Housatonic river east and west of the small excavation south of the gravel parking lot on Parcel K10-11-5;
- Repair or replace beaver controls on Parcel K10-12-1;
- Monitor stressed trees on Parcels K10-10-6 and K10-11-2; and
- Monitor stressed vegetation on Parcel K10-11-5.

Maintenance activities identified above will be conducted prior to the fall 2007 inspection.

Schedule for Future Inspections

In accordance with Technical Attachment J to the SOW, the backfilled/restored areas are to be inspected approximately every 6 months for a period of one year and annually thereafter (subject to EPA approval of a different frequency). Future inspections are anticipated to occur in the fall of each year. Following each inspection, an inspection report will be prepared and submitted to EPA.

In addition, GE is currently developing a Final Completion Report for the Former Oxbows J and K Removal Action. GE anticipates scheduling a pre-certification inspection with EPA and the Massachusetts Department of Environmental Protection in the summer of 2007, and will thereafter submit the Final Completion Report to EPA. That report will include a final Post-Removal Site Control Plan for this area.

Please call me if you have any comments or questions.

Sincerely

Richard W. Gates/EGB

Richard W. Gates
Remediation Project Manager

Attachment

cc: Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston (2 copies)
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Nancy E. Harper, MA AG*
Dale Young, MA EOE
Mayor James Ruberto, City of Pittsfield
Michael Carroll, GE*
Rod McLaren, GE*

Andrew Silfer, GE*
Peter Wojcik, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter LLP
Property Owner – Parcels K10-11-1 & K10-12-1
Property Owner – Parcels K10-11-2
Property Owner – Parcels K10-11-3
Property Owner – Parcels K10-11-5
Property Owner – Parcels K10-11-6
Property Owner – Parcel K10-13-1
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GE Internal Repository

** cover letter only*

Figure

Attachment A

Inspection Summary and
Checklist

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-10-6

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/1/2006

II. INSPECTION SUMMARY

1. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)

- All areas in good condition.

2. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of stressed/sparse cover) and other landscaping items (trees, shrubs, etc.)

- Nine stressed tree plantings.

3. **Other Observations** (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Monitor plantings.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-1

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/1/2006

II. INSPECTION SUMMARY

1. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)

- All areas in good condition.

2. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of stressed/sparse cover) and other landscaping items (trees, shrubs, etc.)

- All areas in good condition.

3. **Other Observations** (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-2

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/1/2006

II. INSPECTION SUMMARY

1. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)
 - All areas in good condition.

2. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of stressed/sparse cover) and other landscaping items (trees, shrubs, etc.))
 - Two stressed maples.

3. **Other Observations** (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)
 - Hay bales along the swale are decomposing. No removal is necessary.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Monitor two stressed maples.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-3

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/1/2006

II. INSPECTION SUMMARY

1. Soil Backfill Areas *(Note any physical changes since last inspection; note evidence of excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)*

- All areas in good condition.

2. Vegetation Area *(Note any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of stressed/sparse cover) and other landscaping items (trees, shrubs, etc.)*

- Six-foot excavation along East Street has stressed/sparse vegetation along bank.
- Area along sewer main has several plantings below one-foot.

3. Other Observations *(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)*

- Ruts were repaired and sufficient growth was observed in areas previously observed with all terrain vehicle ruts/tracks.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Six-foot excavation along East Street should be scratched and seeded.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-5

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/1/2006

II. INSPECTION SUMMARY

1. Soil Backfill Areas *(Note any physical changes since last inspection; note evidence of excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)*

- Erosion along Housatonic River just east of Parcel K10-11-3.
- Erosion along Housatonic River on east and west sides of small excavation south of gravel parking lot.

2. Vegetation Area *(Note any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of stressed/sparse cover) and other landscaping items (trees, shrubs, etc.)*

- Four stressed dogwoods.
- One stressed winterberry holly.
- Fifteen plantings below one-foot including several located on Parcel K10-11-3.

3. Other Observations *(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)*

- Ruts were repaired and sufficient growth was observed in areas previously observed with all terrain vehicle ruts/tracks.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Address soil erosion areas described above.
- Monitor stressed vegetation.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-12-1

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/1/2006

II. INSPECTION SUMMARY

1. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)
- All areas in good condition.
2. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of stressed/sparse cover) and other landscaping items (trees, shrubs, etc.)
- Beaver controls are cutting into bark of tree plantings.
3. **Other Observations** (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)
- Ruts were repaired and sufficient growth was observed in areas previously observed with all terrain vehicle ruts/tracks.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Repair or replace beaver controls.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-13-1

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/1/2006

II. INSPECTION SUMMARY

1. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)

- All areas in good condition.

2. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of stressed/sparse cover) and other landscaping items (trees, shrubs, etc.)

- All areas in good condition.

3. **Other Observations** (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE