



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted Via Overnight Delivery*

May 15, 2006

Mr. William P. Lovely, Jr.  
United States Environmental Protection Agency  
EPA New England (MC HBO)  
One Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023

**Re: Floodplain GE-Pittsfield/Housatonic River Site  
Floodplain Residential and Non-Residential Properties Adjacent to 1½ Mile Reach of  
Housatonic River (GECD710 and GECD720)  
Addendum to Supplemental Information Package for the Phase 4 Floodplain Properties**

Dear Mr. Lovely:

On April 14, 2006, the General Electric Company (GE) submitted to the United States Environmental Protection Agency (EPA) a document titled *Supplemental Information Package for the Phase 4 Floodplain Properties* (Supplemental Information Package). EPA provided conditional approval of that Supplemental Information Package in a letter to GE dated May 11, 2006. That letter directed GE to address EPA's conditions in an Addendum to the Supplemental Information Package. This letter and its attachments serve as that Addendum.

Condition No. 1 in EPA's May 11, 2006 conditional approval letter directed GE to provide information on the pH and organic content of the proposed topsoil source in addition to the analytical results for that topsoil. As noted in the Supplemental Information Package, the proposed topsoil source is a stockpile operated by Ray Robert Excavating, located in Dalton, Massachusetts. It is GE's understanding that this is the same topsoil source being used by EPA for restoration of riverbank and other areas within the 1½ Mile Reach of the Housatonic River. The analytical results for this proposed topsoil source, based on the chemical analysis of two samples collected from the stockpile, are provided in attached Table 1. In addition, the Remediation Contractor has advised GE that its sampling of the topsoil showed a pH of 5.8 and an organic carbon content of 7.7%. These results satisfy the topsoil specifications for pH and organic content contained in the Material and Performance Specifications (Section 02212, Part 2) in Appendix E of the *Removal Design/Removal Action Work Plan for the Phase 4 Floodplain Properties*. GE would like to discuss the use of the proposed topsoil source with EPA following EPA's review of the above-referenced information.

Conditions Nos. 2 through 8 in EPA's letter directed GE to make certain revisions to the Site Restoration Plan provided as Attachment E to the Supplemental Information Package. In response to those conditions, the Site Restoration Plan has been revised, and the Revised Site Restoration Plan is attached.

Condition No. 9 in EPA's letter directed GE to make certain revisions to its plan for Mitigative Measures for Wood Turtles, which was provided as Attachment F to the Supplemental Information Package. In response to this comment, a Revised Plan for Mitigative Measures for Wood Turtles has been prepared and is attached.

Please feel free to contact me if you have any questions regarding this Addendum.

Sincerely,

Handwritten signature of Andrew T. Silfer in blue ink, with the initials "BSS f-c" written in the bottom right corner of the signature.

Andrew T. Silfer, P.E.  
GE Project Coordinator

ACC/csc

Attachments

V:\GE\_Housatonic\_Mile\_and\_Half\Reports and Presentations\Ph 4 SIP Addendum\26962196Ltr.doc

cc: Dean Tagliaferro, EPA  
Rose Howell, EPA\*  
Holly Inglis, EPA  
Tim Conway, EPA  
John Kilborn, EPA  
K.C. Mitkevicius, USACE  
Linda Palmieri, Weston  
Susan Steenstrup, MDEP (2 copies)  
Anna Symington, MDEP\*  
Jane Rothchild, MDEP\*  
Thomas Angus, MDEP\*  
Joanne Flescher, MDEP\*  
Nancy E. Harper, MA AG\*  
Dale Young, MA EOEAA\*  
Mayor James Ruberto, City of Pittsfield

Teresa Bowers, Gradient  
Jeffrey Bernstein, Bernstein, Cushner & Kimmel  
Caleb Mitchell, Pittsfield Conservation Commission  
Charles Dooley, Western Mass. Electric Co.  
Property Owners – Parcels I7-1-2, I6-1-66, I6-1-67,  
I6-1-102, & I6-1-105  
Michael Carroll, GE\*  
Richard Gates, GE  
Rod McLaren, GE\*  
James Nuss, BBL  
James Bieke, Goodwin Procter  
Public Information Repositories  
GE Internal Repository

\* without attachments

# *Table*

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**TABLE 1  
ANALYTICAL RESULTS FOR PROPOSED TOPSOIL SOURCE**

**ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR THE PHASE 4 FLOODPLAIN PROPERTIES  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in dry weight parts per million, ppm)**

Parameter	Sample ID: Date Collected:	RAYROBERT-TOPSOIL-1 04/17/06	RAYROBERT-TOPSOIL-2 04/19/06
<b>Volatile Organics</b>			
1,1,1,2-Tetrachloroethane		ND(0.0062)	ND(0.0059)
1,1,1-Trichloroethane		ND(0.0062)	ND(0.0059)
1,1,2,2-Tetrachloroethane		ND(0.0062)	ND(0.0059)
1,1,2-Trichloroethane		ND(0.0062)	ND(0.0059)
1,1-Dichloroethane		ND(0.0062)	ND(0.0059)
1,1-Dichloroethene		ND(0.0062)	ND(0.0059)
1,2,3-Trichloropropane		ND(0.0062)	ND(0.0059)
1,2-Dibromo-3-chloropropane		ND(0.0062)	ND(0.0059)
1,2-Dibromoethane		ND(0.0062)	ND(0.0059)
1,2-Dichloroethane		ND(0.0062)	ND(0.0059)
1,2-Dichloropropane		ND(0.0062)	ND(0.0059)
1,4-Dioxane		ND(0.12)	ND(0.12)
2-Butanone		ND(0.012)	ND(0.012)
2-Chloro-1,3-butadiene		ND(0.0062)	ND(0.0059)
2-Chloroethylvinylether		ND(0.0062)	ND(0.0059)
2-Hexanone		ND(0.012)	ND(0.012)
3-Chloropropene		ND(0.0062)	ND(0.0059)
4-Methyl-2-pentanone		ND(0.012)	ND(0.012)
Acetone		ND(0.025)	ND(0.024)
Acetonitrile		ND(0.12)	ND(0.12)
Acrolein		ND(0.12)	ND(0.12)
Acrylonitrile		ND(0.0062)	ND(0.0059)
Benzene		0.0049 J	0.0033 J
Bromodichloromethane		ND(0.0062)	ND(0.0059)
Bromoform		ND(0.0062)	ND(0.0059)
Bromomethane		ND(0.0062)	ND(0.0059)
Carbon Disulfide		ND(0.0062)	ND(0.0059)
Carbon Tetrachloride		ND(0.0062)	ND(0.0059)
Chlorobenzene		ND(0.0062)	0.012
Chloroethane		ND(0.0062)	ND(0.0059)
Chloroform		ND(0.0062)	ND(0.0059)
Chloromethane		ND(0.0062)	ND(0.0059)
cis-1,3-Dichloropropene		ND(0.0062)	ND(0.0059)
Dibromochloromethane		ND(0.0062)	ND(0.0059)
Dibromomethane		ND(0.0062)	ND(0.0059)
Dichlorodifluoromethane		ND(0.0062)	ND(0.0059)
Ethyl Methacrylate		ND(0.0062)	ND(0.0059)
Ethylbenzene		ND(0.0062)	ND(0.0059)
Iodomethane		ND(0.0062)	ND(0.0059)
Isobutanol		ND(0.12)	ND(0.12)
Methacrylonitrile		ND(0.0062)	ND(0.0059)
Methyl Methacrylate		ND(0.0062)	ND(0.0059)
Methylene Chloride		ND(0.0062)	ND(0.0059)
Propionitrile		ND(0.012)	ND(0.012)
Styrene		ND(0.0062)	ND(0.0059)
Tetrachloroethene		ND(0.0062)	ND(0.0059)
Toluene		ND(0.0062)	ND(0.0059)
trans-1,2-Dichloroethene		ND(0.0062)	ND(0.0059)
trans-1,3-Dichloropropene		ND(0.0062)	ND(0.0059)
trans-1,4-Dichloro-2-butene		ND(0.0062)	ND(0.0059)
Trichloroethene		ND(0.0062)	ND(0.0059)
Trichlorofluoromethane		ND(0.0062)	ND(0.0059)
Vinyl Acetate		ND(0.0062)	ND(0.0059)
Vinyl Chloride		ND(0.0062)	ND(0.0059)
Xylenes (total)		ND(0.0062)	ND(0.0059)

**TABLE 1  
ANALYTICAL RESULTS FOR PROPOSED TOPSOIL SOURCE**

**ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR THE PHASE 4 FLOODPLAIN PROPERTIES  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in dry weight parts per million, ppm)**

Parameter	Sample ID: Date Collected:	RAYROBERT-TOPSOIL-1 04/17/06	RAYROBERT-TOPSOIL-2 04/19/06
<b>PCBs</b>			
Aroclor-1016		ND(0.041)	ND(0.040)
Aroclor-1221		ND(0.041)	ND(0.040)
Aroclor-1232		ND(0.041)	ND(0.040)
Aroclor-1242		ND(0.041)	ND(0.040)
Aroclor-1248		ND(0.041)	ND(0.040)
Aroclor-1254		ND(0.041)	ND(0.040)
Aroclor-1260		ND(0.041)	ND(0.040)
Total PCBs		ND(0.041)	ND(0.040)
<b>Semivolatile Organics</b>			
1,2,4,5-Tetrachlorobenzene		ND(0.41)	ND(0.40)
1,2,4-Trichlorobenzene		0.044 J	0.11 J
1,2-Dichlorobenzene		ND(0.41)	ND(0.40)
1,2-Diphenylhydrazine		ND(0.41)	ND(0.40)
1,3,5-Trinitrobenzene		ND(0.41)	ND(0.40)
1,3-Dichlorobenzene		0.10 J	0.31 J
1,3-Dinitrobenzene		ND(0.82)	ND(0.80)
1,4-Dichlorobenzene		0.25 J	0.69
1,4-Naphthoquinone		ND(0.82)	ND(0.80)
1-Naphthylamine		ND(0.82)	ND(0.80)
2,3,4,6-Tetrachlorophenol		ND(0.41)	ND(0.40)
2,4,5-Trichlorophenol		ND(0.41)	ND(0.40)
2,4,6-Trichlorophenol		ND(0.41)	ND(0.40)
2,4-Dichlorophenol		ND(0.41)	ND(0.40)
2,4-Dimethylphenol		ND(0.41)	ND(0.40)
2,4-Dinitrophenol		ND(2.1)	ND(2.0)
2,4-Dinitrotoluene		ND(0.41)	ND(0.40)
2,6-Dichlorophenol		ND(0.41)	ND(0.40)
2,6-Dinitrotoluene		ND(0.41)	ND(0.40)
2-Acetylaminofluorene		ND(0.82)	ND(0.80)
2-Chloronaphthalene		ND(0.41)	ND(0.40)
2-Chlorophenol		ND(0.41)	ND(0.40)
2-Methylnaphthalene		ND(0.41)	0.071 J
2-Methylphenol		ND(0.41)	ND(0.40)
2-Naphthylamine		ND(0.82)	ND(0.80)
2-Nitroaniline		ND(2.1)	ND(2.0)
2-Nitrophenol		ND(0.82)	ND(0.80)
2-Picoline		ND(0.41)	ND(0.40)
3&4-Methylphenol		ND(0.82)	ND(0.80)
3,3'-Dichlorobenzidine		ND(0.82)	ND(0.80)
3,3'-Dimethylbenzidine		ND(0.41)	ND(0.40)
3-Methylcholanthrene		ND(0.82)	ND(0.80)
3-Nitroaniline		ND(2.1)	ND(2.0)
4,6-Dinitro-2-methylphenol		ND(0.41)	ND(0.40)
4-Aminobiphenyl		ND(0.82)	ND(0.80)
4-Bromophenyl-phenylether		ND(0.41)	ND(0.40)
4-Chloro-3-Methylphenol		ND(0.41)	ND(0.40)
4-Chloroaniline		ND(0.41)	ND(0.40)
4-Chlorobenzilate		ND(0.82)	ND(0.80)
4-Chlorophenyl-phenylether		ND(0.41)	ND(0.40)
4-Nitroaniline		ND(2.1)	ND(2.0)
4-Nitrophenol		ND(2.1)	ND(2.0)
4-Nitroquinoline-1-oxide		ND(0.82)	ND(0.80)
4-Phenylenediamine		ND(0.82)	ND(0.80)
5-Nitro-o-toluidine		ND(0.82)	ND(0.80)

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(Results are presented in dry weight parts per million, ppm)**

Parameter	Sample ID: Date Collected:	RAYROBERT-TOPSOIL-1 04/17/06	RAYROBERT-TOPSOIL-2 04/19/06
<b>Semivolatle Organics (continued)</b>			
7,12-Dimethylbenz(a)anthracene		ND(0.82)	ND(0.80)
a,a'-Dimethylphenethylamine		ND(0.82)	ND(0.80)
Acenaphthene		ND(0.41)	0.11 J
Acenaphthylene		ND(0.41)	0.074 J
Acetophenone		ND(0.41)	ND(0.40)
Aniline		ND(0.41)	0.087 J
Anthracene		ND(0.41)	0.27 J
Aramite		ND(0.82)	ND(0.80)
Benzidine		ND(0.82)	ND(0.80)
Benzo(a)anthracene		0.077 J	0.68
Benzo(a)pyrene		0.070 J	0.58
Benzo(b)fluoranthene		0.077 J	0.41
Benzo(g,h,i)perylene		0.049 J	0.31 J
Benzo(k)fluoranthene		0.078 J	0.51
Benzyl Alcohol		ND(0.82)	ND(0.80)
bis(2-Chloroethoxy)methane		ND(0.41)	ND(0.40)
bis(2-Chloroethyl)ether		ND(0.41)	ND(0.40)
bis(2-Chloroisopropyl)ether		ND(0.41)	ND(0.40)
bis(2-Ethylhexyl)phthalate		0.14 J	0.15 J
Butylbenzylphthalate		ND(0.41)	ND(0.40)
Chrysene		0.11 J	0.67
Diallate		ND(0.82)	ND(0.80)
Dibenzo(a,h)anthracene		ND(0.41)	ND(0.40)
Dibenzofuran		ND(0.41)	0.071 J
Diethylphthalate		ND(0.41)	ND(0.40)
Dimethylphthalate		ND(0.41)	ND(0.40)
Di-n-Butylphthalate		ND(0.41)	ND(0.40)
Di-n-Octylphthalate		ND(0.41)	ND(0.40)
Diphenylamine		ND(0.41)	ND(0.40)
Ethyl Methanesulfonate		ND(0.41)	ND(0.40)
Fluoranthene		0.16 J	1.5
Fluorene		ND(0.41)	ND(0.40)
Hexachlorobenzene		ND(0.41)	ND(0.40)
Hexachlorobutadiene		ND(0.41)	ND(0.40)
Hexachlorocyclopentadiene		ND(0.41)	ND(0.40)
Hexachloroethane		ND(0.41)	ND(0.40)
Hexachlorophene		ND(0.82)	ND(0.80)
Hexachloropropene		ND(0.41)	ND(0.40)
Indeno(1,2,3-cd)pyrene		0.037 J	0.26 J
Isodrin		ND(0.41)	ND(0.40)
Isophorone		ND(0.41)	ND(0.40)
Isosafrole		ND(0.82)	ND(0.80)
Methapyrilene		ND(0.82)	ND(0.80)
Methyl Methanesulfonate		ND(0.41)	ND(0.40)
Naphthalene		0.39 J	0.99
Nitrobenzene		ND(0.41)	ND(0.40)
N-Nitrosodiethylamine		ND(0.41)	ND(0.40)
N-Nitrosodimethylamine		ND(0.41)	ND(0.40)
N-Nitroso-di-n-butylamine		ND(0.82)	ND(0.80)
N-Nitroso-di-n-propylamine		ND(0.41)	ND(0.40)
N-Nitrosodiphenylamine		ND(0.41)	ND(0.40)
N-Nitrosomethylethylamine		ND(0.82)	ND(0.80)
N-Nitrosomorpholine		ND(0.41)	ND(0.40)
N-Nitrosopiperidine		ND(0.41)	ND(0.40)
N-Nitrosopyrrolidine		ND(0.82)	ND(0.80)

**TABLE 1  
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GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
(Results are presented in dry weight parts per million, ppm)**

<b>Parameter</b>	<b>Sample ID: Date Collected:</b>	<b>RAYROBERT-TOPSOIL-1 04/17/06</b>	<b>RAYROBERT-TOPSOIL-2 04/19/06</b>
<b>Semivolatile Organics (continued)</b>			
o,o,o-Triethylphosphorothioate		ND(0.41)	ND(0.40)
o-Toluidine		ND(0.41)	ND(0.40)
p-Dimethylaminoazobenzene		ND(0.82)	ND(0.80)
Pentachlorobenzene		ND(0.41)	ND(0.40)
Pentachloroethane		ND(0.41)	ND(0.40)
Pentachloronitrobenzene		ND(0.82)	ND(0.80)
Pentachlorophenol		ND(2.1)	ND(2.0)
Phenacetin		ND(0.82)	ND(0.80)
Phenanthrene		0.076 J	1.0
Phenol		ND(0.41)	ND(0.40)
Pronamide		ND(0.41)	ND(0.40)
Pyrene		0.15 J	1.2
Pyridine		ND(0.41)	ND(0.40)
Safrole		ND(0.41)	ND(0.40)
Thionazin		ND(0.41)	ND(0.40)
<b>Inorganics</b>			
Antimony		ND(6.00)	ND(6.00)
Arsenic		4.80	8.40
Barium		40.0	54.0
Beryllium		0.240 B	0.300 B
Cadmium		0.0640 B	0.100 B
Chromium		12.0	9.90
Cobalt		6.70	8.50
Copper		24.0	19.0
Lead		27.0	56.0
Mercury		0.0990 B	0.0890 B
Nickel		13.0	13.0
Selenium		0.580 B	1.30
Silver		ND(1.00)	ND(1.00)
Thallium		ND(1.20)	ND(1.20)
Tin		ND(10.0)	3.80 B
Vanadium		11.0	15.0
Zinc		63.0	100

**Notes:**

1. Samples were collected from a source operated by Ray Robert Excavating located in Dalton, Massachusetts. Samples were collected by Blasland, Bouck & Lee, Inc., and submitted to SGS Environmental Services, Inc. for analysis of PCBs, volatiles, semivolatiles, and metals.
2. ND - Analyte was not detected. The number in parenthesis is the associated detection limit.

**Data Qualifiers:**

**Organics (volatiles, PCBs, semivolatiles)**

J - Indicates an estimated value less than the practical quantitation limit (PQL).

**Inorganics**

B - Indicates an estimated value between the instrument detection limit (IDL) and PQL.

# *Attachments*

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# Revised Site Restoration Plan

## ATTACHMENT E

### ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR THE PHASE 4 FLOODPLAIN PROPERTIES

#### GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS

#### REVISED SITE RESTORATION PLAN

On August 26, 2005, the General Electric Company (GE) submitted a *Removal Design/Removal Action Work Plan for the Phase 4 Floodplain Properties* (RD/RA Work Plan) to the United States Environmental Protection Agency (EPA). EPA conditionally approved the RD/RA Work Plan in a letter to GE dated January 24, 2006. Condition No. 6 of EPA's January 24, 2006 letter stated: "*GE shall include detailed requirements in the Supplemental Information Package regarding mitigative measures to address all impacted resources (i.e., wetlands, the pool located on Parcel I6-1-106, and any species of concern). Such specifications shall include, but not be limited to, site preparation (including measures to inventory and mitigate impacts to habitats and species of concern), excavation, resoiling, short-term erosion control, restoration (including wetlands restoration), and Post Removal Site Control. The mitigative measures shall address soil removal areas and any other area affected by site work, such as access roads and staging areas.*" Mitigative measures related to vegetative areas within the Phase 4 floodplain properties (including the vernal pool within Parcel I6-1-106) are provided in this Revised Site Restoration Plan. Mitigative measures related to species of concern are summarized in the revised Attachment F.

#### Site Restoration Activities

In conjunction with White Engineering, Inc. (White), GE has developed this Site Restoration Plan to summarize the scope of restoration activities to be conducted within the Phase 4 floodplain properties following the completion of removal actions. This plan includes a number of attached work sheets and figures prepared by White.

During the development of this plan, GE met with EPA on several occasions to discuss the scope of restoration activities and the respective roles of GE and EPA. In accordance with those discussions, GE will backfill all removal areas at the Phase 4 floodplain properties with topsoil only. Once topsoil has been placed, EPA will then conduct remaining restoration activities within the Group 4A and 4B floodplain properties as part of its work associated with the 1½ Mile Reach Removal Action. GE will then conduct the remaining restoration activities within the Group 4C floodplain properties. These restoration activities will be performed in the removal areas within the Group 4C properties (shown on revised Technical Drawing 9, which was included in GE's February 10, 2006 RD/RD Work Plan Addendum for the Phase 4 Floodplain Properties). In addition, GE will conduct restoration activities within the portion of the access road installed by EPA along the Group 4C properties, as well as in another area cleared by EPA, as part of its 1½ Mile Reach Removal Action. The attached work sheets and figures show which areas will be restored by EPA and which will be restored by GE, and provide details on the scope of restoration actions to be conducted by GE.

During the development of this Site Restoration Plan, White conducted an inventory of trees that are located in currently uncleared Phase 4 floodplain areas subject to upcoming remediation actions and that have a diameter of at least 6 inches at breast height. See attached Tree Inventory. The results of this tree inventory were then used in developing the scope of tree planting activities to be conducted by GE within the Group 4C properties, as discussed below. The scope of tree planting activities to be conducted by GE within these properties is presented on the attached work sheets and Figure 06-03-01-4C.

## ATTACHMENT E

### ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR THE PHASE 4 FLOODPLAIN PROPERTIES

#### GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS

#### REVISED SITE RESTORATION PLAN

Using the results of the above-referenced inventory of existing trees, a tree planting plan was developed based on the approach of replacing the existing trees within the currently uncleared areas that are subject to remediation actions at ratios of one tree for every tree removed with a diameter between 6 and 12 inches, two trees for every tree removed with a diameter between 12 and 24 inches, and three trees for every tree removed with a diameter greater than 24 inches. These ratios were then applied to the overall extent of the uncleared areas subject to remediation (although not necessarily to every individual area), resulting, on average, in the need to plant trees approximately 10-foot on center. The resulting tree planting plan calling for the planting of trees approximately 10-foot on center was then applied both to the currently uncleared areas and to the currently cleared areas requiring restoration. Tree species to be used during restoration activities were determined by the existing species observed in uncleared areas and nearby species in cleared areas.

The proposed tree planting activities within uncleared and cleared areas will enhance the tree density within the Group 4C properties when compared to pre-existing conditions. The inventory of existing trees within the uncleared areas of Group 4C subject to remediation showed a total of 36 existing trees (with a diameter of at least 6 inches) in those areas. Since these uncleared portions of the Group 4C properties comprise 23,683 square feet (~ 0.54 acre), the average existing tree density in these areas is approximately 65 trees/acre. Although no trees were present in the cleared areas, it is assumed that this density is also generally representative of the tree density in those areas before they were cleared. GE's proposed tree planting plan for both uncleared and cleared areas of the Group 4C properties will involve the planting of a total of 344 trees within an overall area of 42,236 square feet (~ 1 acre) – i.e., an average tree density of approximately 344 trees/acre. Even considering that some of the newly planted trees may not survive (e.g., assuming a survival rate of 80%), these tree planting activities will substantially enhance the pre-existing tree density. Moreover, as discussed below under Post-Removal Site Control Activities, GE will conduct periodic inspections over a 5-year period to monitor the health and condition of the planted trees, and trees observed to be dead or in poor health will be replaced accordingly.

In addition to tree planting, the restoration activities to be conducted by GE at the Group 4C floodplain properties will include the planting of shrubs where indicated on the attached work sheets, and will include seeding the Group 4C areas requiring restoration with the conservation seed mix seed identified on an attached sheet titled "Conservation Seed Mix."

During the performance of restoration activities, following removal of the existing gravel access roads in the Group 4C properties, GE will aerate the underlying soil beneath those roads in access road/staging areas that are not subject to remediation actions. Aeration activities are anticipated to be conducted using standard aeration equipment (i.e., a plug or spike aerator). The number of passes over the subject areas by the aerator will be determined in the field.

As further described in the attached work sheet related to the vernal pool on Parcel I6-1-106, restoration activities within this area will consist of the placement of one foot of topsoil, followed by the placement of a 1- to 2-inch layer of clean leaf litter. Stones, woody debris, and other benthic characteristics important to a wetland habitat will also be replaced, based on observations made prior to and during

## ATTACHMENT E

### ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR THE PHASE 4 FLOODPLAIN PROPERTIES

#### GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS

#### REVISED SITE RESTORATION PLAN

removal actions. To assist in such restoration, photographs of this area will be taken after the area is dewatered and prior to excavation activities. Before restoration of this area is conducted, those photographs will be provided to EPA, along with information related to the placement of stones, woody debris, and other benthic characteristics in the vernal pool.

In addition to the above, based on discussions with EPA, GE will restore an approximate 10-foot-wide strip along the top of bank within the Group 4C floodplain properties with a variety of plantings consistent with the planting activities previously conducted by EPA along other portions of the 1½ Mile Reach of the River. These activities will include the planting of trees and shrubs, as well as seeding with the Conservation Seed Mix (described above) and placement of mulch, as shown on the attached work sheet titled "EPA-Suggested Plantings on 10-Foot Strip on Top-of-Bank Along Housatonic River."

#### Post-Removal Site Control Activities

GE will conduct post-removal site control activities within the Phase 4 floodplain properties, including the Group 4A and 4B properties restored by EPA and the Group 4C properties restored by GE, as well as other restored areas. The post-removal site control activities for the 10-foot-wide strip located along the top of bank of the Housatonic River will be subject to the requirements to be provided in EPA's forthcoming Post-Removal Site Control Plan for the 1½ Mile Reach, and will be conducted by GE in accordance with Paragraph 21.b of the Consent Decree (CD). The scope of post-removal site control activities for restored areas located outside of that 10-foot-wide strip is summarized below.

GE will conduct an inspection of backfilled/restored areas outside of the 10-foot strip approximately one month after completion of construction activities. Thereafter, based on a directive from EPA, GE will inspect these areas every 6 months (anticipated to occur in May and October) for a period of 5 years, subject to a later reduction in this frequency based on discussions between GE and EPA. At a minimum, these inspections will include visual observations of the following: (a) erosion controls to verify their continued effectiveness until such time 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 the backfill materials; and (d) other conditions that could jeopardize the completed remediation. The inspections will also evaluate whether the vegetation that was planted or seeded during restoration activities is growing as anticipated and is providing the desired degree of erosion control.

In connection with the above-referenced periodic inspections, GE will address any conditions that need maintenance or repair. Such maintenance/repair activities would include, but are not limited to: placement of additional topsoil in areas of erosion or settlement; additional planting or seeding if necessary to replace dead, dying, or sparse vegetation; and repair or replacement of any other components of the backfilled/restored areas exhibiting deficiencies or potential problems. Any such conditions noted as a result of the periodic inspections will be addressed as soon as practicable. In addition, once the planted trees have grown to sufficient size, the welded wire tree protectors that were installed around such trees (as described on the attached work sheets and Figure 06-03-01-4C) will be removed.

**ATTACHMENT E**

**ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE  
FOR THE PHASE 4 FLOODPLAIN PROPERTIES**

**GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS**

**REVISED SITE RESTORATION PLAN**

The nature of the maintenance/repair activities conducted after each periodic inspection will be documented in the subsequent inspection report. Inspection reports will include the items listed in Section 10.3.3 of the RD/RA Work Plan.

In accordance with Section 10.2 of the RD/RA Work Plan, additional details related to post-removal site control activities will be provided in the Post-Removal Site Control Plan to be included in the Final Completion Report for the Phase 4 floodplain properties.

**GENERAL ELECTRIC COMPANY PHASE 4 FLOODPLAIN PROPERTIES  
TREE INVENTORY- BRUNSWICK STREET/ POMEROY AVE**

Inventory taken March 2006

By: Shannon Boomsma & Rachel Tomlinson of White Engineering, Inc.

Inventory of trees greater than 6" DBH

All area numbers correspond to numbers shown on "Excavation Limits for Group 4A, 4B, 4C" plan set by BBL and modified by White Engineering, Inc.

Area	Size	Species
1	No trees	
2	No trees	
3	No trees	
4	No trees	
5	No trees	
6	No trees	
7	18"	Eastern Cottonwood
	30"	Eastern Cottonwood
	8.1"	Ash
	7.6"	Ash
	10"	Northern Red Oak
10"		Northern Red Oak
		Northern Red Oak
8	No trees	
9	6.8"	American Elm
	14.5"	Ash
	8.6"	Box Elder
	24"	Red Maple
	16.1"	Red Maple
	12.7"	Red Maple
	7.3"	Red Maple
	18.2"	Red Maple
	9.4"	Sugar Maple
	15"	Sugar Maple
	15.8"	Sugar Maple
	6"	Red Maple
	15.1"	Red Maple
	30"	Sugar Maple
	12.6"	Sugar Maple
	21"	Red Maple
	9"	Red Maple
	15"	Sugar Maple
	9"	Sugar Maple
	36"	Red Maple
6"	Red Maple	
10.6"	Red Maple	
12"	Silver Maple	

Area	Size	Species
10	6.9"	Red Maple
	11.1"	Paper Birch
	15.8"	Paper Birch
	8.6"	Paper Birch
	12.3"	Red Maple
11	No trees	
12	No trees	
13	No trees	
14	No trees	
15	No trees	
16	No trees	
17	15.5"	Eastern Cottonwood
	12.8"	Red Maple
	9.6"	Eastern Cottonwood
	7.4"	Sugar Maple
	6.2"	Sugar Maple
	13.9"	Eastern Cottonwood
	12.9"	Black Cherry
	7.8"	Red Maple
	15.8"	Red Maple
	9.2"	Sugar Maple
	15.1"	Black Cherry
	13.3"	Red Maple
	11.5"	Red Maple
	10.2"	Sugar Maple
	9.9"	Sugar Maple
	16.8"	Basswood
	11.4"	Basswood
12.3"	Basswood	
15.3"	Eastern Cottonwood	
17.4"	Eastern Cottonwood	
17.7"	Paper Birch	
18.2"	Eastern Cottonwood	
7.1"	Basswood	
18	13"	Basswood

**GENERAL ELECTRIC COMPANY PHASE 4 FLOODPLAIN PROPERTIES  
TREE INVENTORY- BRUNSWICK STREET/ POMEROY AVE**

---

Inventory taken March 2006

By: Shannon Boomsma & Rachel Tomlinson of White Engineering, Inc.

Inventory of trees greater than 6" DBH

All area numbers correspond to numbers shown on "Excavation Limits for Group 4A, 4B, 4C"  
plan set by BBL and modified by White Engineering, Inc.

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<b>Area</b>	<b>Size</b>	<b>Species</b>
<b>19</b>	16.5"	Eastern Cottonwood
	7"	Eastern Cottonwood
	10.3"	Eastern Cottonwood
	14.2"	Eastern Cottonwood
	7.8"	Northern Red Oak
	13.3"	Eastern Cottonwood
<b>20</b>	No trees	
<b>21</b>	No trees	
<b>22</b>	No trees	
<b>23</b>	No trees	
<b>24</b>	No trees	
<b>25</b>	No trees	
<b>26</b>	No trees	
<b>27</b>	15"	Eastern Cottonwood
<b>28</b>	No trees	
<b>29</b>	14"	Black Cherry
	15"	Black Cherry
	6"	Sugar Maple
	7"	Sugar Maple
<b>30</b>	13"	Black Cherry

CONSERVATION SEED MIX

(Taken From *Specifications for Phase 3, Stations 543+50 to 575+33, 1.5-Mile Reach Removal Action*, prepared for EPA by Weston Solutions, Inc., Section 02930, pages 9-10)

<b>Botanical Name</b>	<b>Common Name</b>	<b>Percent by Weight</b>
<i>Elymus riparius</i>	stream bank wild rye	25
<i>Elymus canadensis</i>	Canada wild rye	15
<i>Panicum clandestinum</i>	deer-tongue	15
<i>Poa palustris</i>	fowl bluegrass	10
<i>Agrostis stolonifera</i>	creeping bentgrass	10
<i>Desmodium canadense</i>	showy tick-trefoil	6
<i>Polygonum pensylvanicum</i>	Pennsylvania smartweed	5
<i>Asclepias syriaca</i>	common milkweed	2
<i>Solidago canadensis</i>	Canada goldenrod	2
<i>Solidago patula</i>	rough leaved goldenrod	2
<i>Solidago rugosa</i> var. <i>rugosa</i>	wrinkled goldenrod	2
<i>Aster puniceus</i>	bristly aster	2
<i>Aster lateriflorus</i>	calico or golden aster	1
<i>Aster macrophyllus</i>	big-leaved aster	1
<i>Verbena hastata</i>	blue vervain	1
<i>Eupatorium maculatum</i>	spotted joe-pye weed	1
		100

**Work Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties**

**EXCAVATION LIMITS FOR GROUP 4A” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below work. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Work Area: # 1

Area Description: 100-Year Floodplain, void of vegetation

Work Area: 237.52 SF

Proposed Work:       GE to backfill excavation area with loam  
                              EPA to conduct remaining restoration activities

Submitted By:

Shannon Boomsma

White Engineering, Inc

**Work Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties**

**EXCAVATION LIMITS FOR GROUP 4A” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below work. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Work Area: # 2

Area Description: 100-Year Floodplain, void of vegetation

Work Area: 407.84 SF

Proposed Work           GE to backfill excavation area with loam  
                                  EPA to conduct remaining restoration activities

Submitted By:

Shannon Boomsma

White Engineering, Inc

**Work Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties**

**EXCAVATION LIMITS FOR GROUP 4A” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below work. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Work Area: # 3

Area Description: 100-Year Floodplain, void of vegetation

Work Area: 967.36 SF

Proposed Work:       GE to backfill excavation area with loam  
                              EPA to conduct remaining restoration activities

Submitted By:

Shannon Boomsma

White Engineering, Inc

**Work Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4A” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below work. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Work Area: # 4

Area Description: 100-Year Floodplain, void of vegetation

Work Area: 1248.74 SF

Proposed Work:       GE to backfill excavation area with loam  
                              EPA to conduct remaining restoration activities

Submitted By:

Shannon Boomsma

White Engineering, Inc

**Work Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties**

**EXCAVATION LIMITS FOR GROUP 4A” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below work. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Work Area: # 5

Area Description: 100-Year Floodplain, void of vegetation

Work Area: 4271.47 SF

Proposed Work:       GE to backfill excavation area with loam  
                              EPA to conduct remaining restoration activities

Submitted By:

Shannon Boomsma

White Engineering, Inc

**Work Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties**

**EXCAVATION LIMITS FOR GROUP 4A” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below work. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Work Area: # 6

Area Description: 100-Year Floodplain, void of vegetation

Work Area: 347.83 SF

Proposed Work:       GE to backfill excavation area with loam  
                              EPA to conduct remaining restoration activities

Submitted By:

Shannon Boomsma

White Engineering, Inc

**Work Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4A” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below work. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Work Area: # 7

Area Description: 100-Year Floodplain

Work Area: 4117.47 SF

Proposed Work:       GE to backfill excavation area with loam  
                          EPA to conduct remaining restoration activities

Submitted By:

Shannon Boomsma  
White Engineering, Inc

**Work Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties**

**EXCAVATION LIMITS FOR GROUP 4A” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below work. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Work Area: # 8

Area Description: 100-Year Floodplain, void of vegetation

Work Area:3393.64 SF

Proposed Work:       GE to backfill excavation area with loam  
                              EPA to conduct remaining restoration activities

Submitted By:

Shannon Boomsma

White Engineering, Inc

**Work Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4A” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below work. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Work Area: # 9

Area Description: 100-Year Floodplain

Work Area: 12,364.62 SF

Proposed Work: GE to remove road material and backfill excavation area with loam  
EPA to conduct remaining restoration activities

Submitted By:

Shannon Boomsma

White Engineering, Inc

**Work Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties**

**EXCAVATION LIMITS FOR GROUP 4B” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below work list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Work Area: # 10

Area Description: 100-Year Floodplain, mainly void of vegetation

Work Area: 4158.20 SF

Proposed Work:       GE to backfill excavation area with loam  
                              EPA to conduct remaining restoration activities

Submitted By:

Shannon Boomsma

White Engineering, Inc

**Work Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties**

**EXCAVATION LIMITS FOR GROUP 4B” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below work. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Work Area: # 11

Area Description: 100-Year Floodplain, void of vegetation

Work Area: 760.86 SF

Proposed Work:       GE to backfill excavation area with loam  
                              EPA to conduct remaining restoration activities

Submitted By:

Shannon Boomsma

White Engineering, Inc

**Work Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4B” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below work. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Work Area: # 12

Area Description: 100-Year Floodplain, void of vegetation

Work Area: 17.29 SF

Proposed Work: GE to backfill excavation area with loam  
EPA to conduct remaining restoration activities

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 13

Area Description: 100-Year Floodplain, void of vegetation

Planting Area: 176.97 SF

Proposed Species and #: 2 Red Maple (*Acer rubrum*) 1 ½ - 2” in dia.  
1 Sugar Maple (*Acer saccharum*) 1 ½-2” in dia.

Specifications:

Plant trees 10-ft on center

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 14

Area Description: 100-Year Floodplain, void of vegetation

Planting Area: 576 SF (excluding sewer right-of-way)

Proposed Species and #: 8 Sugar Maple (*Acer saccharum*) 1 ½-2” in dia.

Specifications:

Plant trees 10-ft on center. Note that plantings will not occur within the sewer right-of-way.

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma  
White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 15

Area Description: 100-Year Floodplain, void of vegetation

Planting Area: 297.52 SF

Proposed Species and #: 4 Eastern Cottonwood (*Populus deltoides*) 1 ½-2” in dia.

Specifications:

Plant trees 10-ft on center

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 16

Area Description: 100-Year Floodplain, void of vegetation

Planting Area: 1127.73 SF

Proposed Species and #: 6 Silver Maple (*Acer saccharinum*) 1 ½-2” in dia.  
4 Box Elder (*Acer negundo*) 1 ½ -2” in dia.

Specifications:

Plant trees 10-ft on center

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 17

Area Description: 100-Year Floodplain, partially void of vegetation

Planting Area: 18,058 SF (excluding sewer right-of-way)

Proposed Species and #: 65 Eastern Cottonwood (*Populus deltoids*) 1 ½ “- 2” in dia.  
54 Silver Maple (*Acer saccharinum*) 1 ½”- 2” in dia.  
66 Box Elder (*Acer negundo*) 1 ½” - 2” in diameter  
4 Winterberry Holly (*Ilex verticillata*) 3-4 ft in height

Specifications:

Plant trees 10-ft on center (see Figure 06-03-01-4C), shrubs to be clumped 4-ft on center 10-ft from trees. Note that plantings will not occur within the sewer right-of-way.

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma  
White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 18

Area Description: 100-Year Floodplain

Planting Area: 523 SF (excluding sewer right-of-way)

Proposed Species and #: 4 Sugar Maple (*Acer saccharum*) 1 ½-2” in dia.

Specifications:

Plant trees 10-ft on center

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma  
White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 19

Area Description: 100-Year Floodplain

Planting Area: 616 SF

Proposed Species and #: 4 Silver Maple (*Acer saccharinum*) 1 ½”- 2” in dia.

Specifications:

Plant trees 10-ft on center (see Figure 06-03-01-4C), shrubs to be clumped 4-ft on center 10-ft from trees.

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma  
White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 20

Area Description: 100-Year Floodplain, void of vegetation

Planting Area: 589.20 SF

Proposed Species and #: 4 Silver Maple (*Acer saccharinum*) 1 ½-2” in dia.

Specifications:

Plant trees 10-ft on center

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 21

Area Description: 100-Year Floodplain, void of vegetation

Planting Area: 107 SF (excluding sewer right-of-way)

Proposed Species and #: 2 Eastern cottonwood (*Populus deltoides*) 1 ½-2” in dia.

Specifications:

Plant trees 10-ft on center. Note that plantings will not occur within the sewer right-of-way.

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 22

Area Description: 100-Year Floodplain, void of vegetation

Planting Area: 418.19 SF

Proposed Species and #: 4 Box Elder (*Acer negundo*) 1 ½-2” in dia.

Specifications:

Plant trees 10-ft on center

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma  
White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 23

Area Description: 100-Year Floodplain, void of vegetation

Planting Area: 11,430 SF (excluding sewer right-of-way)

Proposed Species and #:	15 Eastern cottonwood ( <i>Populus deltoides</i> )	1 ½-2” in dia.
	17 Silver Maple ( <i>Acer saccharinum</i> )	1 ½-2” in dia.
	15 Box Elder ( <i>Acer negundo</i> )	1 ½-2” in dia.

Specifications:

Plant trees 10-ft on center (see Figure 06-03-03-4C), shrubs to be clumped 4-ft on center 10-ft from trees. Note that plantings will not occur within the sewer right-of-way.

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 24

Area Description: 100-Year Floodplain, void of vegetation

Planting Area: 659 SF (excluding sewer right-of-way)

Proposed Species and #: 4 Eastern cottonwood (*Populus deltoides*) 1 ½-2” in dia.

Specifications:

Plant trees 10-ft on center. Note that plantings will not occur within the sewer right-of-way.

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 25

Area Description: 100-Year Floodplain, void of vegetation

Planting Area: 2,789 SF (excluding sewer right-of-way)

Proposed Species and #:	15 Eastern cottonwood ( <i>Populus deltoides</i> )	1 ½-2” in dia.
	6 Red Maple ( <i>Acer rubrum</i> )	1 ½ -2” in dia.
	9 Sugar Maple ( <i>Acer saccharum</i> )	1 ½ -2” in dia.
	5 Northern Arrowwood ( <i>Viburnum dentatum</i> )	3-4 ft in height

Specifications:

Plant trees 10-ft on center (see Figure 06-03-01-4C), shrubs to be clumped 4-ft on center 10-ft from trees. Note that plantings will not occur within the sewer right-of-way.

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma  
White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 26

Area Description: 100-Year Floodplain, void of vegetation

Planting Area: 16.77 SF

Proposed Species and #: 1 Box Elder (*Acer negundo*) 1 ½ - 2” in dia.

Specifications:

Use 12” diameter welded wire tree protector for tree

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 27

Area Description: 100-Year Floodplain, partially void of vegetation

Planting Area: 1708.40 SF

Proposed Species and #: 10 Eastern Cottonwood (*Populus deltoides*) 1 ½-2” in dia.  
10 Box Elder (*Acer negundo*) 1 ½ - 2” in dia.

Specifications:

Plant trees 10-ft on center

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 28

Area Description: 100-Year Floodplain, Vernal Pool

Planting Area: 2842.28 SF

Proposed Species and #: See attached specifications  
10 Silky Dogwood (Cornus amomum)

Submitted By:

Edward Stockman  
Stockman and Associates

Shannon Boomsma  
White Engineering, Inc

**Specifications  
For  
General Electric Company, Pittsfield, MA  
For excavation limits as shown on plan entitled  
“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Excavation Area: #28  
Area Description: Vernal Pool  
Area Size: 2842.28 SF

Specifications for Restoration of Vernal Pool Area:

- 1) It is strongly recommended that excavation work be conducted after June 15<sup>th</sup>.
- 2) Photographs shall be taken prior to excavation activities and after dewatering has taken place for use during restoration.
- 3) Water shall be pumped from the pool to a confined area and treated per General Electric Company Guidelines prior to release.
- 4) Excavated area shall receive one foot of approved loam.
- 5) Loam shall be covered with 1-2 inches of clean leaf litter.
- 6) Stones, woody debris and other benthic characteristics important to habitat, as found in the photographs referenced in Note 2, shall be replaced. Prior to restoration activities, these photographs shall be provided to EPA along with information related to the placement of stones, woody debris, and other benthic characteristics in the vernal pool.
- 7) Dogwoods as specified on Planting List shall be located in similar areas as to those removed. Refer to photos.

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 29

Area Description: 100-Year Floodplain

Planting Area: 131.81 SF

Proposed Species and #: 3 Sugar Maple (*Acer saccharum*) 1 ½-2” in dia.

Specifications:

Plant trees 10-ft on center

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For excavation limits as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Each excavation area has been assigned a number which corresponds to the below planting list. Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: # 30

Area Description: 100-Year Floodplain

Planting Area: 168.51 SF

Proposed Species and #: 3 Sugar Maple (*Acer saccharum*) 1 ½-2” in dia.

Specifications:

Plant trees 10-ft on center

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**For Work Areas as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the work area location.*

Planting Area: Additional areas cleared by EPA, as shown on Figure 06-03-01-4C

Area Description: 100-Year Floodplain, void of vegetation

Proposed Species and #: 75 Eastern Cottonwood (*Populus deltoids*) 1 ½ “- 2” in dia.  
28 Silver Maple (*Acer saccharinum*) 1 ½”- 2” in dia.  
87 Box Elder (*Acer negundo*) 1 ½” - 2” in diameter  
112 Red Maple (*Acer rubrum*) 1 ½”-2” in dia.  
11 Northern Arrowwood (*Viburnum dentatum*) 1 ½-2” in dia.

Specifications:

Plant trees 10-ft on center (see Figure 06-03-01-4C)

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply a thin layer of mulch

Submitted By:

Shannon Boomsma

White Engineering, Inc

## **Planting Plan**

**For**

**General Electric Company, Pittsfield, MA**

**EPA Suggested Plantings on 10-Foot Strip on Top-of-Bank Along Housatonic River  
as shown on plan entitled**

**“Addendum to RD/RA Work Plan for Phase 4 Floodplain Properties  
EXCAVATION LIMITS FOR GROUP 4C” by BBL, Inc. February 2006**

*Please refer to plans as noted above and modified by White Engineering, Inc. on May 15, 2006 for the excavation area location.*

Planting Area: 10-ft strip on top of bank along Housatonic River

Area Description: 100-Year Floodplain, void of vegetation

Planting Area: 8,080 SF

Proposed Species and #:

- 32 Black Willow ( Salix nigra) 4-6 ft in height
- 32 Silver Maple (Acer saccharinum) 4-6 ft in height
- 33 Box Elder (Acer negundo) 4-6 ft in height
- 33 Eastern Cottonwoods (Populus deltoides) 4-6ft in height
  
- 102 Red Osier Dogwood (Cornus sericea) 2-3-ft in height
  
- 34 Silky Dogwood (Cornus amomum) 2-3 ft in height
- 34 Winterberry Holly (Ilex verticillata) 2-3 ft in height
- 33 Northern Arrowwood (Viburnum dentatum) 2-3’ in height
- 34 Choke Cherry (Prunus virginiana) 2-3-ft in height

Specifications:

Plant trees 8-ft on center in unevenly spaced sinuous rows

Red Osier Dogwoods shall be planted within 2 feet of riverbank rip rap at 8-ft on center

Shrubs to be clumped 4-ft on center in 12’ x 50’ oblong clumps 40-ft apart..

Use 12” diameter welded wire tree protectors for all trees

Backfill plant pit with compost and topsoil

Seed with Conservation Seed Mix (specified on separate sheet) and apply thin layer of mulch

Submitted By:

Shannon Boomsma

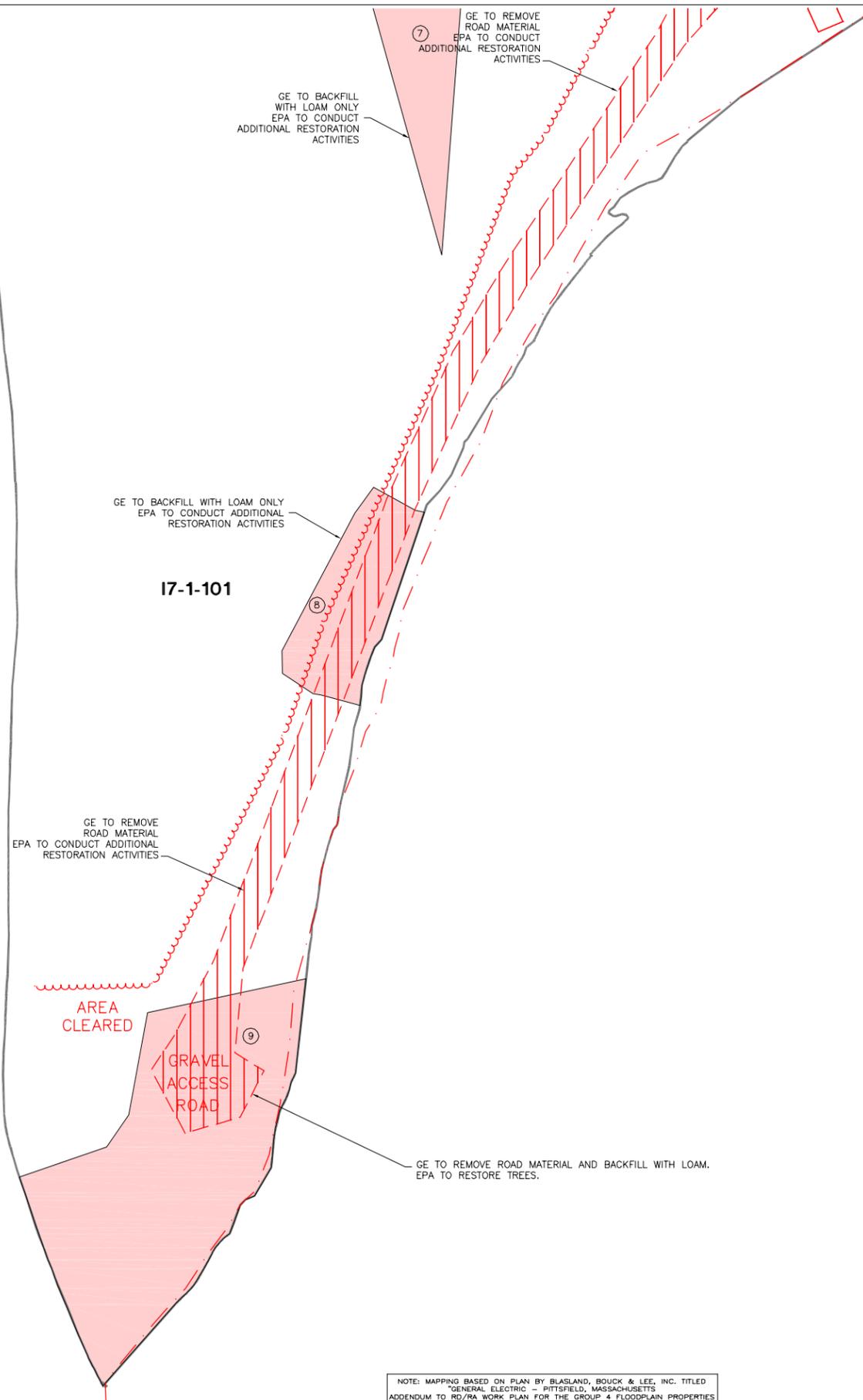
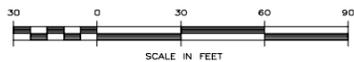
White Engineering, Inc



- 1-FOOT REMOVAL
- 2-FOOT REMOVAL
- 3-FOOT REMOVAL
- ACCESS ROAD AREA
- 17-1-101** PARCEL ID

**SITE PLAN**

SCALE: 1" = 30'



NOTE: MAPPING BASED ON PLAN BY BLASLAND, BOUCK & LEE, INC. TITLED "GENERAL ELECTRIC - PITTSFIELD, MASSACHUSETTS ADDENDUM TO RD/RA WORK PLAN FOR THE GROUP 4 FLOODPLAIN PROPERTIES EXCAVATION LIMITS FOR GROUP 4A" DATED FEBRUARY 2006. PLANTING PLAN BY WHITE ENGINEERING, INC.

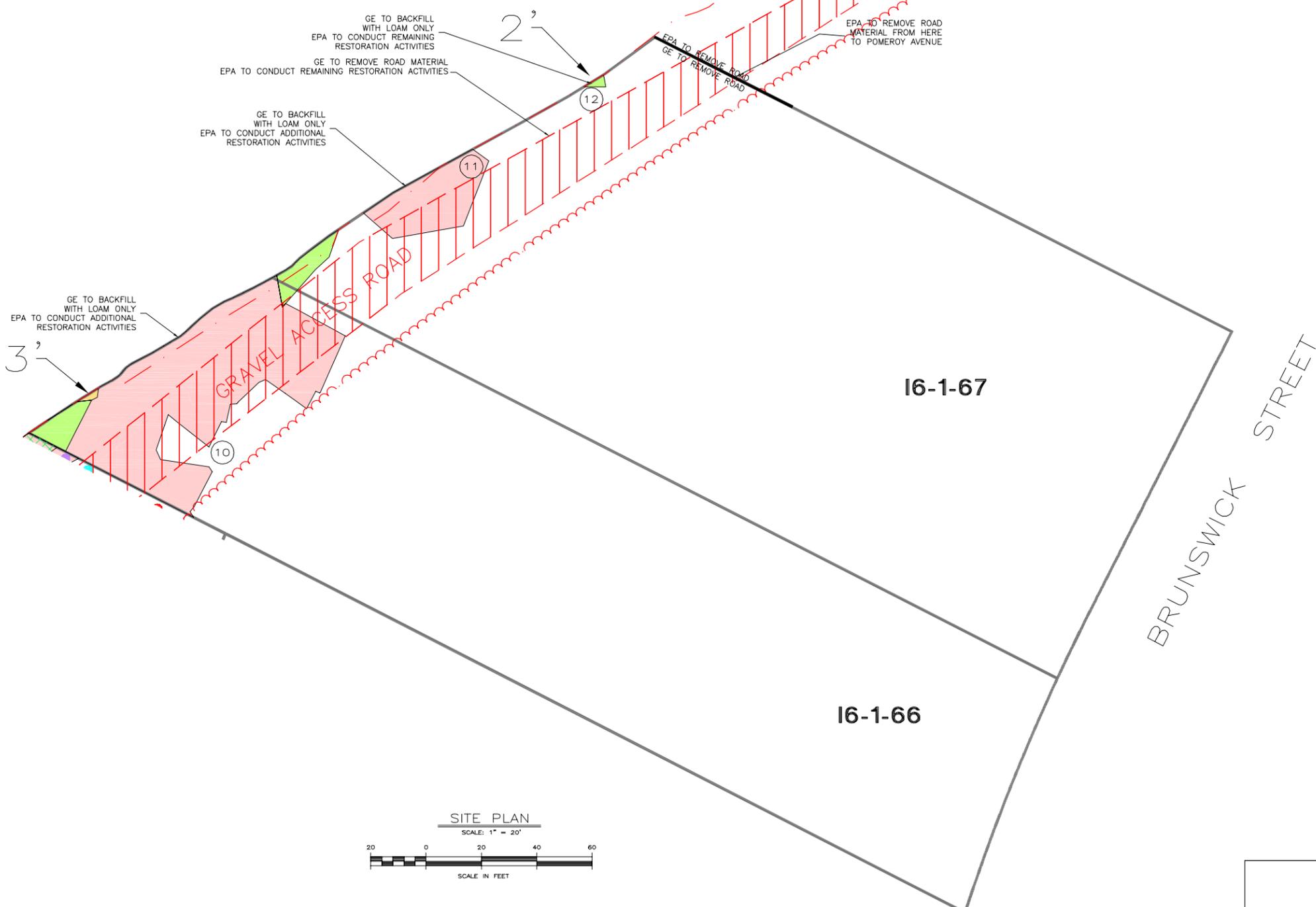
REMEDIATION PLANTING PLAN for GROUP 4A FLOODPLAIN PROPERTIES prepared for GENERAL ELECTRIC PITTSFIELD, MA			
NO:	REVISION:	BY:	DATE:



**WHITE ENGINEERING INC.**  
 CIVIL & ENVIRONMENTAL

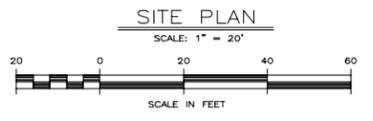
55 SOUTH MERRIAM STREET, PITTSFIELD, MA 01201

PHONE (413) 443-8011	DRN: RZT	APPV: MPW	DWG NO: 06-03-01-4A
DATE: APRIL 12, 2006	CHK: SDB	SCALE: AS NOTED	SHEET 2 OF 2



- 1-FOOT REMOVAL
- 2-FOOT REMOVAL
- 3-FOOT REMOVAL
- ACCESS ROAD AREA

**16-1-67** PARCEL ID



NOTE: MAPPING BASED ON PLAN BY BLASLAND, BOUCK & LEE, INC. TITLED "GENERAL ELECTRIC - PITTSFIELD, MASSACHUSETTS ADDENDUM TO RD/RA WORK PLAN FOR THE GROUP 4 FLOODPLAIN PROPERTIES EXCAVATION LIMITS FOR GROUP 4B" DATED FEBRUARY 2006. PLANTING PLAN BY WHITE ENGINEERING, INC.

REMEDIATION PLANTING PLAN for GROUP 4B FLOODPLAIN PROPERTIES prepared for GENERAL ELECTRIC PITTSFIELD, MA			

**WHITE ENGINEERING INC.**  
CIVIL & ENVIRONMENTAL

55 SOUTH MERRIAM STREET, PITTSFIELD, MA 01201

PHONE (413) 443-8011    E-MAIL WHITEENG@AOL.COM    FAX (413) 443-8012

DATE: APRIL 12, 2006	DRN: RZT	APPV: MPW	DWG NO: 06-03-01-4B
DRGN: NONE	CHKD: SDB	SCALE: AS NOTED	SHEET 1 OF 1



GE TO PLANT 10' WIDE AREA WITH EPA-Suggested Plantings on 10-Foot Strip on Top-of-Bank Along Housatonic River (SEE PLANTING PLAN FOR DETAILS)

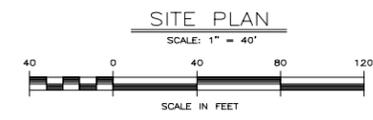
GE TO PLANT 10' WIDE AREA WITH EPA-Suggested Plantings on 10-Foot Strip on Top-of-Bank Along Housatonic River (SEE PLANTING PLAN FOR DETAILS)

GE TO REMOVE ALL ROAD MATERIAL

GE TO PLANT 10' WIDE AREA WITH EPA-Suggested Plantings on 10-Foot Strip on Top-of-Bank Along Housatonic River (SEE PLANTING PLAN FOR DETAILS)

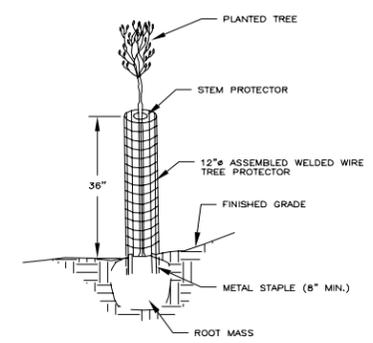
GE TO PLANT 10' WIDE AREA WITH EPA-Suggested Plantings on 10-Foot Strip on Top-of-Bank Along Housatonic River (SEE PLANTING PLAN FOR DETAILS)

RED OSIER DOGWOODS TO BE PLANTED IN THIS AREA CONSISTENT WITH UPSTREAM 10-FOOT WIDE STRIP



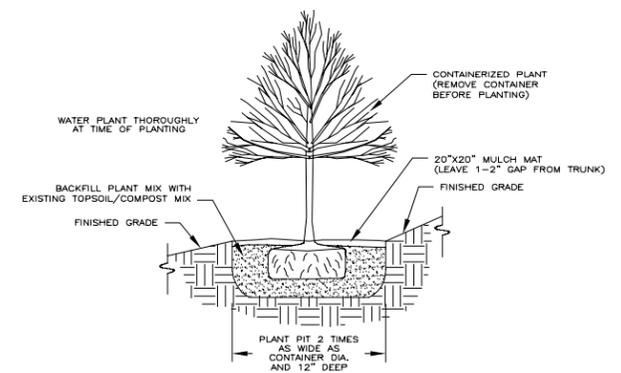
**FIGURE NOTES:**

1. THE BASE MAP FEATURES (EXCLUDING THE RIVERS) PRESENTED ON THIS FIGURE ARE FROM SURVEY BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, FILE NO. GE1100-001, DATED 6/7/05. RIVER LOCATIONS WERE PHOTOGAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS. RIVER LOCATIONS ARE APPROXIMATE.
2. UTILITIES ARE SHOWN IN AN APPROXIMATED WAY ONLY AND ALL UTILITIES MAY NOT BE SHOWN. THE APPROXIMATE LOCATION OF THE 50' WIDE RIGHT OF WAY SHOWN HEREON IS BASED UPON PHYSICAL EVIDENCE OF SAID WAY. THIS LOCATION VARIES FROM THE PLANS OF RECORD WHICH DEPICT THIS RIGHT OF WAY AS "APPLETON PARKWAY" AND "RIVERWOOD ROAD".
3. PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION.



**TREE PROTECTOR DETAIL**

NO SCALE  
NOTE: WELDED WIRE TREE PROTECTOR IS TO BE MANUALLY REMOVED ONCE TREE HAS GROWN TO 4" DBH.



**TREE PLANTING DETAIL**

NO SCALE

**LEGEND**

SPECIES	SYMBOL
RED MAPLE	●
SUGAR MAPLE	●
SILVER MAPLE	●
COTTONWOOD	●
BOX ELDER	●
NORTHERN ARROWOOD	▲
TOP-OF-BANK STRIP PLANTINGS (SEE PLANTING PLAN)	■

■	1-FOOT REMOVAL
■	2-FOOT REMOVAL
■	3-FOOT REMOVAL
■	ACCESS ROAD AREA
---	EASEMENT
-s-	SANITARY SEWER
16-1-106	PARCEL ID

TITLE: REMEDIATION PLANTING PLAN for GROUP 4C FLOODPLAIN PROPERTIES prepared for GENERAL ELECTRIC PITTSFIELD, MA			
1	REVISION 1	RZT	05/10/06
NO:	REVISED:	BY:	SCALE:

**WHITE ENGINEERING INC.**  
CIVIL & ENVIRONMENTAL  
55 SOUTH MERRIAM STREET, PITTSFIELD, MA 01201

PHONE (413) 443-8011 E-MAIL WHITEENG@AOL.COM FAX (413) 443-8012

DATE: APRIL 12, 2006 DRN: RZT APV: MPW DWG NO: 06-03-01-4C

DIGN: NONE CHK: SDB SCALE: AS NOTED SHEET 1 OF 1

NOTE: MAPPING BASED ON PLAN BY BLASLAND, BOUCK & LEE, INC. TITLED "GENERAL ELECTRIC - PITTSFIELD, MASSACHUSETTS ADDENDUM TO RD/RA WORK PLAN FOR THE GROUP 4 FLOODPLAIN PROPERTIES EXCAVATION LIMITS FOR GROUP 4C" DATED FEBRUARY 2006. PLANTING PLAN BY WHITE ENGINEERING, INC.

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# Revised Plan for Mitigative Measures for Wood Turtles

## ATTACHMENT F

### ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR THE PHASE 4 FLOODPLAIN PROPERTIES

#### GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS

#### REVISED PLAN FOR MITIGATIVE MEASURES FOR WOOD TURTLES

On August 26, 2005, the General Electric Company (GE) submitted a *Removal Design/Removal Action Work Plan for the Phase 4 Floodplain Properties* (RD/RA Work Plan) to the United States Environmental Protection Agency (EPA). EPA conditionally approved the RD/RA Work Plan in a letter to GE dated January 24, 2006. Condition No. 6 of EPA's January 24, 2006 letter stated: "*GE shall include detailed requirements in the Supplemental Information Package regarding mitigative measures to address all impacted resources (i.e., wetlands, the pool located on Parcel I6-1-106, and any species of concern). Such specifications shall include, but not be limited to, site preparation (including measures to inventory and mitigate impacts to habitats and species of concern), excavation, resoiling, short-term erosion control, restoration (including wetlands restoration), and Post Removal Site Control. The mitigative measures shall address soil removal areas and any other area affected by site work, such as access roads and staging areas.*" Mitigative measures related to vegetative areas within the Phase 4 floodplain properties (including the vernal pool within Parcel I6-1-106) are provided in the Site Restoration Plan (Attachment E). Mitigative measures related to species of concern are summarized below.

In its January 24, 2006 letter, EPA informed GE of the occurrence of the wood turtle (*Clemmys insculpta*), a Commonwealth of Massachusetts Species of Special Concern, within the Phase 4 floodplain properties. Based on information provided by Woodlot Alternatives, Inc. (Woodlot) on behalf of EPA, GE proposes to implement the measures described below in order to mitigate impacts to wood turtles (if present) during remediation and restoration actions.

Prior to initiating remediation actions at Phase 4 floodplain properties, GE has installed a silt fence and hay bales around the majority of the remediation areas to prevent the migration of wood turtles into these areas. Based on discussions with EPA, GE completed the installation of the silt fence and hay bales on April 14, 2006; the silt fence/hay bales were installed at the approximate locations specified on the revised Technical Drawings 4 through 6, submitted as part of the Supplemental Information Package. The silt fence and hay bales were installed in accordance with the specifications on the revised Technical Drawing 13, submitted as part of the Supplemental Information Package. As such, the silt fence consists of a woven geotextile and extends approximately 36 inches above grade and is anchored at its base. Posts supporting the fence were placed at a minimum frequency of one per every eight feet and hay bales were placed on the excavation side of the silt fence.

During remediation/restoration activities, the silt fence and hay bales will be visually inspected each morning prior to the initiation of on-site activities and each afternoon prior to leaving the site, to ensure that the integrity of the barrier is maintained and that there are no gaps or holes. Any locations requiring maintenance will be immediately repaired following each inspection.

In addition, GE arranged for Edward Stockman of Stockman Associates, located in Plainfield, Massachusetts, to conduct training of key project personnel. Mr. Stockman is a qualified wetlands scientist. Mr. Stockman trained these personnel (five individuals) in the identification and proper handling of wood turtles on April 27, 2006. On each day of remediation/restoration activities, trained personnel will visually inspect areas subject to remediation/restoration actions for wood turtles prior to,

## **ATTACHMENT F**

### **ADDENDUM TO SUPPLEMENTAL INFORMATION PACKAGE FOR THE PHASE 4 FLOODPLAIN PROPERTIES**

#### **GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS**

#### **REVISED PLAN FOR MITIGATIVE MEASURES FOR WOOD TURTLES**

and in conjunction with, performance of such actions. In addition, all workers will be instructed to report any observations of any turtles within the remediation areas to their supervisor.

In the event that wood turtles are observed, remediation/restoration actions will be stopped (if occurring) and trained personnel will relocate the turtles outside of the remediation area. During such relocation, turtles will be handled as little as possible and maintained in an upright position to avoid unnecessary stress. All turtles will be held and transported in a covered cooler or box until released. Coolers or boxes will be placed in shaded areas to protect against direct sunlight and to maintain a temperature consistent with the habitat from which the turtle was collected. Coolers or boxes will be lined with vegetation to prevent injury to the turtle during transport. Turtles will not be held in coolers or boxes longer than the transport time from the remediation area to the release location. The release location will be within the floodplain south of the Phase 4 floodplain properties at a location to be proposed for EPA review and approval prior to commencing removal actions. Prior to release of the turtles, photographs will be taken of the top and bottom of each turtle, as well as any distinguishing marks.

In addition to the above, GE will complete daily inspection logs to document any observations of wood turtles during the remediation/restoration actions, as well as any turtle relocation activities. Copies of these logs, as well as the above-referenced photographs, will be included in the Final Completion Report for the Phase 4 floodplain properties.