



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

October 11, 2006

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

**Re: Floodplain GE-Pittsfield/Housatonic River Site
Floodplain Residential and Non-Residential Properties Adjacent to 1½ Mile Reach of
Housatonic River (GECD710 and GECD720)
Summary of September 2006 Inspection Activities for the Phase 4 Floodplain Properties**

Dear Mr. Tagliaferro:

On September 20, 2006, the General Electric Company (GE) performed its first post-remediation inspection of several properties located within the floodplain adjacent to the 1½ Mile Reach of the Housatonic River that have been identified as being in Phase 4 of the 1½ Mile Floodplain Removal Action Areas. These properties are divided into three groups (Group 4A, 4B, and 4C), as depicted on Figure 1, and consist of five residential properties and six recreational properties. The remediation of these properties was completed this summer, and those portions of the properties that were subject to remediation by GE were inspected.

The September 2006 post-construction inspection was conducted in accordance with Section 10.3 of GE's August 2005 *Removal Design/Removal Action Work Plan for the Phase 4 Floodplain Properties* (Phase 4 Work Plan) and with the Site Restoration Plan which was Attachment E to GE's April 14, 2006 *Supplemental Information Package for the Phase 4 Floodplain Properties*. This inspection was performed for areas that were backfilled and restored during the implementation of the remediation actions.

The September 2006 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. To document the results of the September 2006 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.

In summary, the September 2006 inspection indicated that some of the Phase 4 properties will require minor maintenance during fall 2006. As noted on the attached forms, restoration activities at the majority of the Phase 4 properties are currently ongoing and remaining activities primarily involve the planting of trees and/or shrubs. Most of the maintenance activities to be conducted in fall 2006 include checking the condition of trees and shrubs and reseeding certain areas following tree/shrub installations. Other follow-up activities are primarily related to Parcel I7-1-101 and include:

- checking the recently seeded area between the top-of-bank and paved access road to see if adequate vegetation has been established;
- checking to see that tire ruts within the tree planting area have been addressed; and
- checking that adequate vegetation is established in the unpaved access road following restoration activities.

It should be noted that the majority of erosion controls within the Phase 4 properties have been removed due to the establishment of adequate vegetation.

In accordance with the above-referenced Phase 4 Work Plan and Site Restoration Plan, backfilled/restored areas will be inspected approximately every 6 months for a period of two years. Future inspections are anticipated to occur in May and October of 2007 and 2008 and will assess the same conditions noted above. Following each inspection, an inspection report will be prepared and submitted to EPA.

Please call me if you have any comments or questions.

Sincerely

Richard Gates / EGB

Richard Gates
Remediation Project Manager

Attachment

V:\GE_Housatonic_Mile_and_Half\Reports and Presentations\Inspections\52362196Ltr.doc

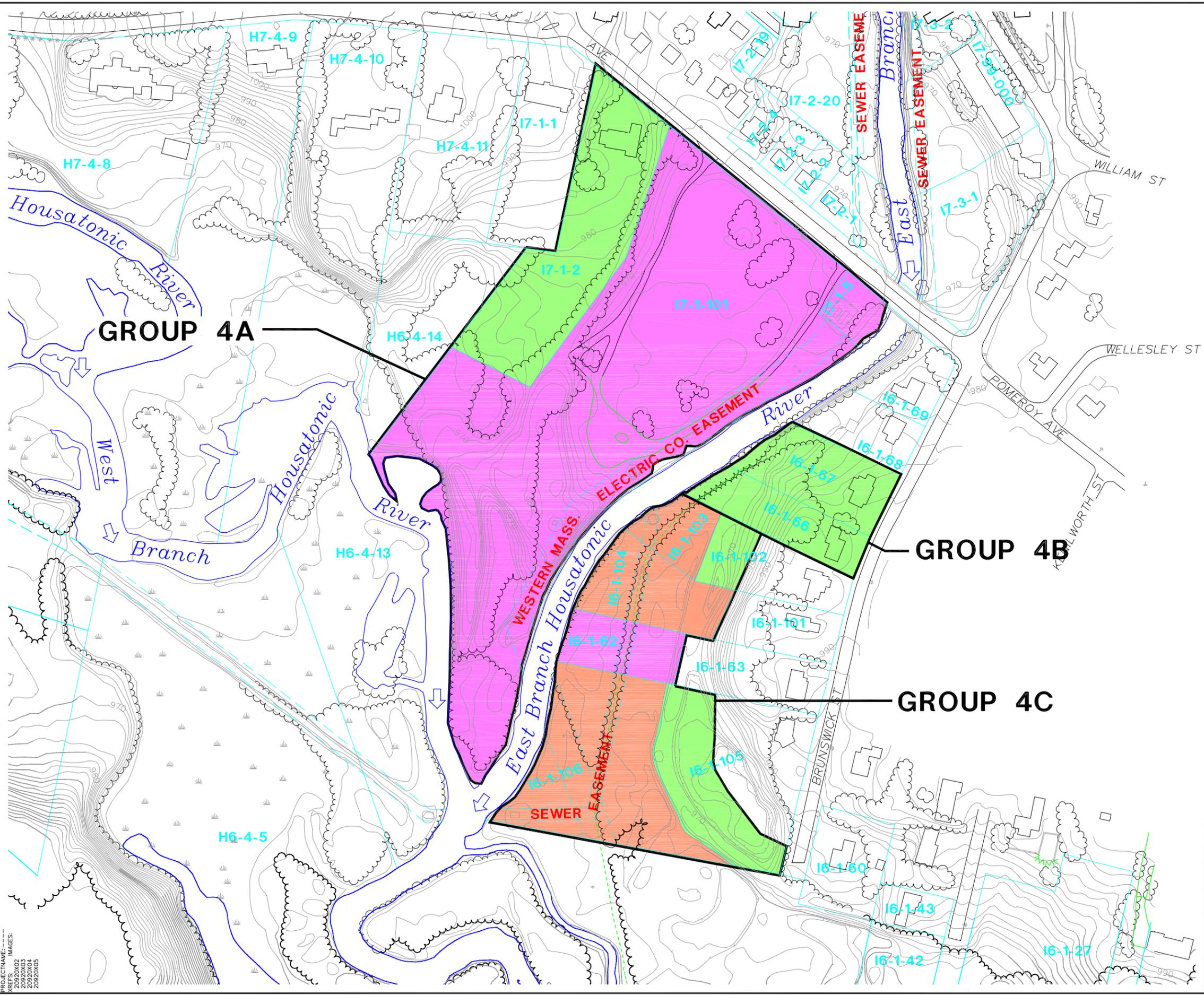
cc: Rose Howell, EPA*
Holly Inglis, EPA
Tim Conway, EPA*
John Kilborn, EPA
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Joanne Flescher, MDEP*
Nancy E. Harper, MA AG*
Dale Young, MA EOE*

Mayor James Ruberto, City of Pittsfield*
Linda Palmieri, Weston
Michael Carroll, GE*
Andrew Silfer, GE
Rod McLaren, GE*
James Nuss, BBL
James Bieke, Goodwin Procter
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** cover letter only*

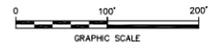
Figure

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 PROJECT NAME: 20920002
 20920003
 20920004
 20920005



- LEGEND:**
- PAVED ROADWAY
 - UNPAVED ROADWAY OR TRAIL
 - VEGETATION
 - INDEX ELEVATION CONTOUR
 - PROPERTY BOUNDARY
 - 17-1-2 PROPERTY ID
 - RESIDENTIAL PROPERTY - ACTUAL/POTENTIAL LAWN AREA (AS DEFINED IN SOW)
 - NON-GE-OWNED RECREATIONAL PROPERTY - NON-BANK AREA
 - GE-OWNED RECREATIONAL PROPERTY - NON-BANK AREA

- NOTES:**
1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
 2. PARCEL IDENTIFICATION AND BOUNDARIES OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE AND IS CURRENT THROUGH SEPTEMBER 5, 1997.



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
 SEPTEMBER 2006 INSPECTION

SITE PLAN



Attachment A

INSPECTION SUMMARY AND CHECKLIST
HOUSATONIC RIVER (1.5-MILE REACH) -
RESIDENTIAL/NON-RESIDENTIAL FLOODPLAIN PROPERTIES

PARCEL I7-1-101 (Group 4A)

I. GENERAL INFORMATION

Inspection Date: 9/20/2006
 Conducted By: P.J. Wojcik and A.C. Corbin
 Weather Conditions: Clear, sunny, 70's
 Date of Last Inspection: Initial inspection following completion of removal actions.

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.)*
 Overall good condition. Some tire ruts are present within areas currently subject to tree and shrub planting activities and will be addressed in the future.

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.))*
 Restoration within Parcel I7-1-101 is ongoing. Remaining activities primarily involve the planting of trees and shrubs. Tree and shrub planting activities were being conducted during the inspection.
 Overall, the vegetative cover is very well established with the exception of the area between the top-of-bank and paved access road which was recently seeded. The unpaved roadway used to access the southernmost portion of this parcel is currently being used during tree and shrub planting activities and will require seeding in the future.
 Trees and shrubs that have been planted appear to be 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.)*
 Not applicable since this is the initial inspection.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Check recently seeded areas to ensure adequate vegetation is established.
- Check the condition of trees and shrubs following installation.
- Check to see if tire ruts have been addressed.
- Check to see if adequate vegetation is established in unpaved access road following restoration activities.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST
HOUSATONIC RIVER (1.5-MILE REACH) -
RESIDENTIAL/NON-RESIDENTIAL FLOODPLAIN PROPERTIES

PARCEL I6-1-66 (Group 4B)

I. GENERAL INFORMATION

Inspection Date: 9/20/2006
Conducted By: P.J. Wojcik and A.C. Corbin
Weather Conditions: Clear, sunny, 70's
Date of Last Inspection: Initial inspection following completion of removal actions.

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.)*

Okay.

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.)*

The vegetative cover is 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.)*

Not applicable since this is the initial inspection.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

None.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST
HOUSATONIC RIVER (1.5-MILE REACH) -
RESIDENTIAL/NON-RESIDENTIAL FLOODPLAIN PROPERTIES

PARCEL I6-1-67 (Group 4B)

I. GENERAL INFORMATION

Inspection Date: 9/20/2006
Conducted By: P.J. Wojcik and A.C. Corbin
Weather Conditions: Clear, sunny, 70's
Date of Last Inspection: Initial inspection following completion of removal actions.

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.)*

Okay.

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.)*

The vegetative cover is 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.)*

Not applicable since this is the initial inspection.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

None.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST
HOUSATONIC RIVER (1.5-MILE REACH) -
RESIDENTIAL/NON-RESIDENTIAL FLOODPLAIN PROPERTIES

PARCEL I6-1-62 (Group 4C)

I. GENERAL INFORMATION

Inspection Date: 9/20/2006
 Conducted By: P.J. Wojcik and A.C. Corbin
 Weather Conditions: Clear, sunny, 70's
 Date of Last Inspection: Initial inspection following completion of removal actions.

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.)*

Okay.

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.)*

Restoration within Parcel I6-1-62 is ongoing. Remaining activities involve planting of trees and shrubs.

Overall, the vegetative cover is very well established with the exception of certain relatively small areas which will be reseeded during tree and shrub planting activities.

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.)*

Not applicable since this is the initial inspection.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

Check the condition of trees and shrubs following installation.

Reseed certain areas following tree installation activities.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST
HOUSATONIC RIVER (1.5-MILE REACH) -
RESIDENTIAL/NON-RESIDENTIAL FLOODPLAIN PROPERTIES

PARCEL I6-1-102 (Group 4C)

I. GENERAL INFORMATION

Inspection Date: 9/20/2006
Conducted By: P.J. Wojcik and A.C. Corbin
Weather Conditions: Clear, sunny, 70's
Date of Last Inspection: Initial inspection following completion of removal actions.

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.)*

Okay.

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.))*

Restoration within Parcel I6-1-102 is ongoing. Remaining activities involve planting of trees.

The vegetative cover is 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.)*

Not applicable since this is the initial inspection.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

Check the condition of trees and shrubs following installation.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST
HOUSATONIC RIVER (1.5-MILE REACH) -
RESIDENTIAL/NON-RESIDENTIAL FLOODPLAIN PROPERTIES

PARCEL I6-1-103 (Group 4C)

I. GENERAL INFORMATION

Inspection Date: 9/20/2006
 Conducted By: P.J. Wojcik and A.C. Corbin
 Weather Conditions: Clear, sunny, 70's
 Date of Last Inspection: Initial inspection following completion of removal actions.

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.)*

Okay.

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.)*

Restoration within Parcel I6-1-103 is ongoing. Remaining activities involve planting of trees and shrubs.

Overall, the vegetative cover is very well established with the exception of certain relatively small areas which will be reseeded during tree and shrub planting activities.

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.)*

Not applicable since this is the initial inspection.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

Check the condition of trees and shrubs following installation.

Reseed certain areas following tree installation activities.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST
HOUSATONIC RIVER (1.5-MILE REACH) -
RESIDENTIAL/NON-RESIDENTIAL FLOODPLAIN PROPERTIES

PARCEL I6-1-104 (Group 4C)

I. GENERAL INFORMATION

Inspection Date: 9/20/2006
 Conducted By: P.J. Wojcik and A.C. Corbin
 Weather Conditions: Clear, sunny, 70's
 Date of Last Inspection: Initial inspection following completion of removal actions.

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.)*

Okay.

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.))*

Restoration within Parcel I6-1-104 is ongoing. Remaining activities involve planting of trees and shrubs.

Overall, the vegetative cover is very well established with the exception of certain relatively small areas which will be reseeded during tree and shrub planting activities.

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.)*

Not applicable since this is the initial inspection.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

Check the condition of trees and shrubs following installation.

Reseed certain areas following tree installation activities.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST
HOUSATONIC RIVER (1.5-MILE REACH) -
RESIDENTIAL/NON-RESIDENTIAL FLOODPLAIN PROPERTIES

PARCEL I6-1-105 (Group 4C)

I. GENERAL INFORMATION

Inspection Date: 9/20/2006
Conducted By: P.J. Wojcik and A.C. Corbin
Weather Conditions: Clear, sunny, 70's
Date of Last Inspection: Initial inspection following completion of removal actions.

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.)*

Okay.

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.)*

Restoration within Parcel I6-1-105 is ongoing. Remaining activities involve planting of trees.

The vegetative cover is 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.)*

Not applicable since this is the initial inspection.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

Check the condition of trees and shrubs following installation.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST
HOUSATONIC RIVER (1.5-MILE REACH) -
RESIDENTIAL/NON-RESIDENTIAL FLOODPLAIN PROPERTIES

PARCEL I6-1-106 (Group 4C)

I. GENERAL INFORMATION

Inspection Date: 9/20/2006
Conducted By: P.J. Wojcik and A.C. Corbin
Weather Conditions: Clear, sunny, 70's
Date of Last Inspection: Initial inspection following completion of removal actions.

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.)*

Okay.

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.)*

Restoration within Parcel I6-1-106 is ongoing. Remaining activities involve planting of trees and shrubs.

Overall, the vegetative cover is very well established with the exception of certain relatively small areas which will be reseeded during tree and shrub planting activities.

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.)*

Not applicable since this is the initial inspection.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

Check the condition of trees and shrubs following installation.

Reseed certain areas following tree installation activities.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE