



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted Via Overnight Courier*

July 11, 2007

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

**Re: GE-Pittsfield/Housatonic River Site  
Building 71 On-Plant Consolidation Area (GECD220)  
Summary of June 2007 Post-Closure Inspection Activities**

Dear Mr. Tagliaferro:

Consistent with the requirements set forth in Section 9 of the June 1999 *Detailed Work Plan for On-Plant Consolidation Areas* (Detailed Work Plan) for post-closure care, the General Electric Company (GE) conducted a post-closure inspection of the Building 71 On-Plant Consolidation Area (OPCA). The post-closure inspection was performed on GE's behalf by ARCADIS BBL on June 1, 2007 and generally included the final cover area of the Building 71 OPCA and associated components.

Provided below is a description of the inspection activities performed during the June 2007 inspection of the Building 71 OPCA final cover area, as well as a summary of the results of the inspection, including items identified requiring maintenance. A progress summary of maintenance activities performed subsequent to the Fall 2006 inspection is also provided in the inspection form (Attachment 1 to this letter).

### **Inspection Activities**

In accordance with Section 9 of the Detailed Work Plan, the June 1, 2007 post-closure inspection consisted of visual observations of the Building 71 OPCA final cover and surrounding areas to identify the overall condition of the final cover and associated components, as well as items needing maintenance. The Building 71 OPCA final cover was visually inspected to identify the presence of any of the following conditions, which could affect the overall integrity of the final cover:

- areas void of vegetation or exposed geosynthetic final cover components;
- evidence of erosion or stressed vegetation;
- evidence of burrowing animals;
- apparent surface settlement;
- ponding water conditions;
- undesirable/insufficient vegetative growth;
- undesirable slope conditions (i.e., non-conductive to positive drainage);
- excessive wheel rutting; and
- obstructed drainage features.

In addition to inspecting the final cover, the post-closure inspection included observations of the following associated components:

- paved site access roads;
- the final cover access road;
- surface water drainage system, including the North and South stormwater basins;
- the leachate handling system; and
- perimeter vegetation.

The conditions that were observed at each of these components are listed on the inspection form used during the inspection.

### **Inspection Results**

The results of the post-closure inspection were recorded on the inspection form provided as Attachment 1 to this letter. This inspection form presents details of the maintenance items identified during the post-closure inspection, as well as proposed repair activities. A site figure is also attached to this letter (Attachment 2) that depicts (by reference to the corresponding letter and number on the inspection form) the approximate locations of the items identified as requiring maintenance.

In general, the June 1, 2007 post-closure inspection indicated that the Building 71 OPCA final cover was in good overall condition. As shown in Section II, Column B of the inspection form, seven items were noted during the post-closure inspection as needing maintenance. Some of the items were observed at multiple locations (see Attachment 2). The more significant of these maintenance items are:

- sideslope erosion of the final cover topsoil layer that was installed in 2006;
- sparse vegetation on the plateau of final cover that was seeded in 2006; and
- sediment and debris accumulation within the perimeter ditches.

Further details regarding the seven maintenance items noted during the post-closure inspection, as well as recommendations for addressing these items, are provided on the inspection form. Photographs taken during the inspection are also included as an attachment to this letter (Attachment 3).

### **Schedule for Future Inspections**

In accordance with Section 9 of the Detailed Work Plan, the closed portions of the OPCAs will be inspected approximately every six months to assess the integrity of the final cover and associated components. The next post-closure inspection will be performed in the Fall of 2007, and will include (as appropriate) portions of the Hill 78 final cover. The inspections will continue until GE proposes, and the U.S. Environmental Protection Agency (EPA) approves, a modification or termination of such inspections. Future post-closure inspection reports will also include a progress summary of the maintenance activities identified during the prior inspection period.

Please call me if you have any comments or questions concerning the June 1, 2007 inspection.

Sincerely,

*Richard Gates/EGB*

Richard Gates  
Remediation Project Manager

Attachment

cc: Tim Conway, EPA  
John Kilborn, EPA  
Holly Inglis, EPA  
Rose Howell, EPA\*  
K.C. Mitkevicius, USACE  
Susan Steenstrup, MDEP (2 copies)  
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Tom Hickey, Director, PED  
Mayor James Ruberto, City of Pittsfield  
Pittsfield Department of Health  
Michael Carroll, GE\*  
Andrew Silfer, GE  
Roderic McLaren, GE\*  
James Nuss, ARCADIS BBL  
James Bieke, Goodwin Procter  
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*\*cover letter only*

**Attachments**

**Attachment 1**

Inspection Form

**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
BUILDING 71 ON-PLANT CONSOLIDATION AREA (OPCA)**

**POST-CLOSURE INSPECTION FORM**

**I. Inspection Information**

Inspection Date: June 1, 2007 (Friday) Weather Conditions: Partly cloudy/Hazy/Humid/83°F  
 Inspection Area: Building 71 OPCA Phase I & II Cover Areas and ancillary site components  
 Performed by: Robert J. Papallo  
 Time Arrived: 1:00 PM Time Departed: 2:30 PM  
 Date of Prior Inspection: September 8, 2006

**II. Observations**

**Column A Column B**

<b>A. Site Access Road</b>			
	1. Is there excessive cracking, potholes, visible fissures, or spalling?	<input type="text" value="No"/>	Yes
	2. Are the subbase materials exposed in an unsatisfactory manner?	<input type="text" value="No"/>	Yes
<b>B. Final Cover Access Road</b>			
	1. Is there excessive erosion or rutting of road surface?	<input type="text" value="No"/>	Yes
	2. Is there undesirable vegetative growth?	<input type="text" value="No"/>	Yes
<b>C. Site Security</b>			
	1. Are the access gates and locks in operating condition?	<input type="text" value="Yes"/>	No
	2. Is the perimeter fence in satisfactory condition (i.e., in proper position, adequately secured to fence posts, etc.)?	<input type="text" value="Yes"/>	No
	3. Are the posted signs on the perimeter fence securely attached to fence and visible?	<input type="text" value="Yes"/>	No
<b>D. Final Cover System</b>			
	1. Are there bare spots (i.e., areas void of vegetation) or exposed geosynthetic cover components?	No	<input type="text" value="Yes"/>
	2. Is there excessive erosion or stressed vegetation?	No	<input type="text" value="Yes"/>
	3. Is there evidence of burrowing animals?	No	<input type="text" value="Yes"/>
	4. Is there evidence of settlement?	<input type="text" value="No"/>	Yes
	5. Is there evidence of ponding water conditions?	<input type="text" value="No"/>	Yes
	6. Is there sparse or undesirable vegetative growth?	No	<input type="text" value="Yes"/>
	7. Are the slopes adequate for surface water drainage?	<input type="text" value="Yes"/>	No
	8. Is there evidence of excessive wheel rutting?	<input type="text" value="No"/>	Yes
	9. Are cover system drainage layer outlet pipes visible and free of obstructions?	<input type="text" value="Yes"/>	No
<b>E. Surface Water Drainage System</b>			
	1. Does established vegetation provide adequate erosion protection?	<input type="text" value="Yes"/>	No
	2. Are there noticeable obstructions (i.e., sediment accumulation, debris, etc.)?	No	<input type="text" value="Yes"/>
	3. Are there bare spots (i.e., areas void of vegetation) or excessive erosion on stormwater basin berm slopes?	<input type="text" value="No"/>	Yes
	4. Are the stormwater basin inlet and outlet features (i.e., riprap forebay and concrete manhole) functioning and free of excessive sediment and debris buildup?	<input type="text" value="Yes"/>	No
	5. Are the drainage culverts functioning properly (i.e., unobstructed inlet/outlet, pipe ends un-damaged, etc.)?	<input type="text" value="Yes"/>	No
<b>F. Leachate Handling System</b>			
	1. Are the pumps in operating condition?	<input type="text" value="Yes"/>	No
	2. Are the leachate storage tanks in satisfactory condition?	<input type="text" value="Yes"/>	<input type="text" value="No"/>
	3. Is the leachate collection manhole in satisfactory condition?	<input type="text" value="Yes"/>	No
	4. Are the usable leachate transfer pipes in satisfactory condition?	<input type="text" value="Yes"/>	No
	5. Is the auto dialer warning system in operating condition?	<input type="text" value="Yes"/>	No
	6. Is the flow meter in operating condition?	<input type="text" value="Yes"/>	No
	7. Are the float levels in operating condition?	<input type="text" value="Yes"/>	No
<b>G. Perimeter Vegetation</b>			
	1. Does the vegetation provide for adequate erosion protection?	<input type="text" value="Yes"/>	No
	2. Are there bare spots (i.e., areas void of vegetation) or excessive erosion?	<input type="text" value="No"/>	Yes
	3. Is there undesirable vegetative growth?	<input type="text" value="No"/>	Yes
<b>H. Other</b>			
	1. Are there additional conditions that were observed and noted during the inspection?	No	<input type="text" value="Yes"/>

**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
BUILDING 71 ON-PLANT CONSOLIDATION AREA (OPCA)**

**POST-CLOSURE INSPECTION FORM**

**III. Inspection Observations**

Describe observations from Column B in Section II. Use additional pages if necessary.

**(Locations of the following identified items are depicted on the figure in Attachment 2).**

- D1. An area on the northern sideslope of the final cover installed in 2006 is void of vegetation.
- D2. Sideslope erosion was noted along the sideslopes of the final cover installed in 2006. Additionally, prior to this inspection, it was observed that the western termination of the northern midslope swale was eroded.
- D3. Animal burrow holes were noted within the southern Sedimentation Basin.
- D6. Sparse vegetation was observed on the plateau of the final cover installed in 2006.
- E2. Excessive sediment accumulation was observed within the perimeter ditches on the south side of the Building 71 OPCA.
- F2. Tank access covers need to be painted.

**IV. Inspection Response Actions**

Describe response actions to be conducted for each observation noted in Section III above. Use additional pages if necessary.

- D2. At the time of this inspection, the western termination of the midslope swale had been repaired by reconfiguring a silt fence, filling the erosion with topsoil, regrading, seeding, and mulching. Sideslope erosion should be filled with topsoil, regraded and seeded in conjunction with mid-slope swale construction. Sediment accumulation resulting from erosion along the northern toe of the final cover installed in 2006 should be removed and riprap should be placed along the toe at the designed locations.
- D3. The burrowing animals should be removed from the OPCAs. Animal burrow holes should be filled with topsoil and seeded.
- D6. The plateau of the final cover installed in 2006 should be reseeded.
- E2. Sediment accumulation should be removed to restore ditches to design depth. Where regrading is necessary, the area should be reseeded and lined with temporary erosion control mat.
- F2. Tank access covers should be repainted as part of ongoing maintenance activities.

**V. Prior Inspections**

Describe response actions conducted to address prior maintenance needs.

- A1. Pothole was repaired.
- D2. Sideslope erosion was filled with topsoil, regraded, seeded and lined with a temporary erosion control mat.
- E2, E3, E5. Perimeter ditches were mowed, regraded and seeded. In addition, sediment accumulation was removed to restore ditches to design depth.
- E4. Sedimentation Basins were mowed. The elevation of the south Sedimentation Basin floor was verified by the on-site Contractor (D.R. Billings) to meet original design elevations. The silt screen within the south Sedimentation Basin was removed. The height of the stone around the northern and southern Sedimentation Basin outlet structures was confirmed to be a minimum of 6 inches above outlet holes.
- F2. Tank access covers to be repainted in the spring of 2007, as part of ongoing maintenance activities.
- H1. Final cover and adjacent areas were mowed.

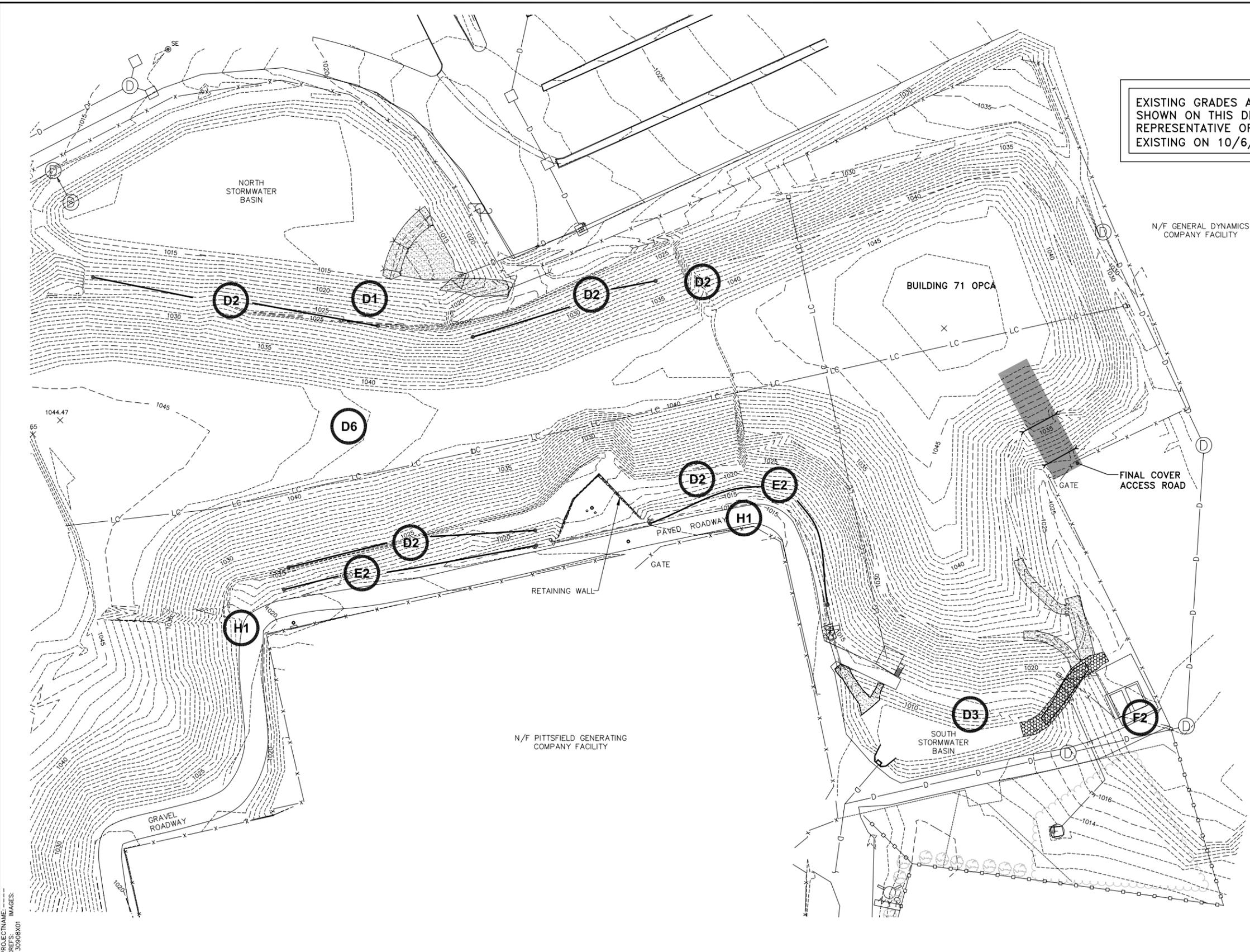
**VI. Other Observations**

- H1. The silt fence and hay bales at the toe of the Hill 78 OPCA should be removed as necessary in conjunction with upgradient final cover installation. The silt fence and hay bales along the southeast perimeter of the Hill 78 OPCA should be removed and replaced with a rock check dam installed within the adjacent perimeter ditch at the approximate western limit of the Phase II final cover. Undermining of the pavement on the access road east of the retaining wall is evident and should be repaired.

**Attachment 2**

Site Figure

S:\B5-LAF LAYER: ON\* OFF=REF\* PENTABLE: P:\CON1.ctb PRINTED: 6/19/2007 8:27 AM BY: BPITTSLEY  
 G:\CAD\GE-CAD\GE\_ACTIVE\N\_30908001\INSPECT\30908001.DWG SAVED: 6/19/2007 8:26 AM LAYOUT: 1 PAGESETUP: -----  
 PROJECT NAME: IMAGES: 30908X01



EXISTING GRADES AND FEATURES SHOWN ON THIS DRAWING ARE REPRESENTATIVE OF CONDITIONS EXISTING ON 10/6/06.



**LEGEND:**

- SURVEY BENCHMARK
- CATCH BASIN
- DRAIN MANHOLE
- ELECTRIC MANHOLE
- UTILITY POLE
- FIRE HYDRANT
- BOLLARD
- WELL
- TREE
- RIPRAP
- RENO MATTRESS
- CENTERLINE DITCH
- DRAINAGE LINES
- CHAIN LINK FENCE
- WOOD STOCKADE FENCE
- INDEX CONTOUR LINE
- INTERMEDIATE CONTOUR LINE
- VEGETATION
- LEACHATE COLLECTION FORCEMAIN
- UNDERGROUND ELECTRIC LINES
- CULVERT
- INSPECTION OBSERVATION ITEM (SEE NOTE 5)

**NOTES:**

1. BASE MAP INFORMATION SHOWN ON THIS DRAWING FROM "EXISTING SITE PLAN" BY ARCADIS BBL, DATED APRIL 2007.
2. ELEVATIONS SHOWN ARE REFERENCED TO NATIONAL GEODETIC VERTICAL DATUM (NGVD 1929).
3. HORIZONTAL DATUM IS REFERENCED TO THE MASSACHUSETTS STATE PLANE COORDINATE SYSTEM (NAD 1927).
4. CONTOUR INTERVAL EQUALS 1 FOOT.
5. INSPECTION OBSERVATION ITEMS CORRESPOND TO THE INSPECTION OBSERVATIONS DESCRIBED IN THE JUNE 1, 2007 POST-CLOSURE INSPECTION FORM.

ORIGINAL SCALE APPLIES TO 22"x34" DRAWING

1"=40'

THIS DRAWING WAS PREPARED AT THE SCALE(S) INDICATED. INACCURACIES IN THE STATED SCALE(S) MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED. USE THE GRAPHIC SCALE BAR(S) TO DETERMINE THE ACTUAL SCALE(S) OF THIS DRAWING.

No.	Date	Revisions	Init

THIS DRAWING IS THE PROPERTY OF ARCADIS BBL AND MAY NOT BE REPRODUCED OR ALTERED IN WHOLE OR IN PART WITHOUT THE EXPRESS WRITTEN PERMISSION OF ARCADIS BBL.

Professional Engineer's Name  
**JAMES M. NUSS**

Professional Engineer's No.  
38000

State  
MA

Date Signed

Project Mgr. PHB    Designed by CAA    Drawn by LAF



GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS  
 HILL 78 AND BUILDING 71 OPCAs  
**POST CLOSURE INSPECTION**  
**JUNE 1, 2007**

GENERAL

ARCADIS Project No.  
309.08

Date  
JUNE 2007

(The Project Engineer must confirm with Barbara Prendergast the appropriate Legal Entity name and address to replace this text)

**Attachment 3**

Photographs



Description: View of Southern Sedimentation Basin (looking west).



Description: View of Building 71 OPCA southwestern sideslope and perimeter ditch (looking north).



Description: View of Building 71 OPCA southeastern sideslope, mid-slope swale and final cover access road (looking east).



Description: View of the repaired western termination of the northern mid-slope swale of the Building 71 OPCA (looking south).



Description: View of Building 71 OPCA northern sideslope and northern Sedimentation Basin (looking west).



Description: View of Building 71 OPCA perimeter ditch and eastern sideslope (looking south).



Description: View of Building 71 northern sideslope erosion and northern Sedimentation Basin (looking east).



Description: View of Building 71 OPCA plateau and leachate collection pipe cleanout (looking south).



Description: View of Building 71 OPCA plateau and southern sideslope (looking northwest).