GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Courier

June 12, 2008

Mr. Richard Hull
EPA Project Coordinator
United States Environmental Protection Agency
One Congress Street, Suite 1100
Boston, MA 02114-2023

Re: GE-Pittsfield/Housatonic River Site
Building 71 and Hill 78 On-Plant Consolidation Areas (GECD210 & GECD220)
Summary of Spring 2008 Post-Closure Inspection Activities

Dear Mr. Hull:

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) and the capped portion of the Hill 78 OPCA. The post-closure inspection was performed on GE's behalf by ARCADIS on May 16, 2008 and generally included the Building 71 and Hill 78 OPCAs final cover area and associated components. Also present during the inspection was Weston Solutions, Inc. as a representative for the U.S. Environmental Protection Agency (EPA).

Provided below is a description of the inspection activities performed during the Spring 2008 inspection, as well as a summary of the results of the inspection (including items identified as requiring maintenance). A progress summary of maintenance activities performed subsequent to the Fall 2007 inspection is also provided in the post-closure inspection form (Attachment 1 to this letter).

Inspection Activities

In accordance with Section 9 of the Detailed Work Plan, the Spring 2008 post-closure inspection consisted of visual observations of the Building 71 and Hill 78 OPCAs final cover and surrounding area to identify the overall condition of the final cover and associated components, as well as items needing maintenance. The Building 71 and Hill 78 OPCAs final cover area were 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-conducive 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 post-closure inspection form (Attachment 1).

Inspection Results

The results of the Spring 2008 post-closure inspection were recorded on the inspection form. The 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 Spring 2008 post-closure inspection indicated that the Building 71 and Hill 78 OPCAs final cover areas are in good overall condition. As shown in Section II of the inspection form, five items were noted during the post-closure inspection for follow-up maintenance. Some of the items were observed at multiple locations (see Attachment 2). The more significant of these maintenance items are:

- sparse vegetation on the northern sideslope of final cover at the Hill 78 and Building 71 OPCA transition; and
- evidence of animals burrowing into soils adjacent to and within final cover areas.

Further details regarding the maintenance items noted during the post-closure inspection, as well as recommendations for addressing these items, are provided on the inspection form (Attachment 1). 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 2008. The inspections will continue until GE proposes, and the 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 Spring 2008 inspection.

Sincerely,

Richard Gates/SME

Richard Gates
Remediation Project Manager

Attachment

cc: Dean Tagliaferro, EPA
Tim Conway, EPA
John Kilborn, EPA
Holly Inglis, EPA
Rose Howell, EPA*
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Linda Palmieri, Weston (2 copies)
Nancy E. Harper, MA AG*
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Mayor James Ruberto, City of Pittsfield
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Michael Carroll, GE*
Roderic McLaren, GE*
James Nuss, ARCADIS
James Bieke, Goodwin Procter
Public Information Repositories
GE Internal Repository

**cover letter only*

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Attachments

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Attachment 1

Inspection Form

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
BUILDING 71 AND HILL 78 ON-PLANT CONSOLIDATION AREAS (OPCAs)

POST-CLOSURE INSPECTION FORM

I. Inspection Information

Inspection Date:	May 16, 2008 (Friday)	Weather Conditions:	Cloudy with a Few Showers/44-69°F Winds W 5-10 MPH
Inspection Area:	Building 71 OPCA/Capped portion of Hill 78 OPCA Final Cover and ancillary site components		
Performed by:	Robert J. Papallo (ARCADIS)		
Observed by:	Michael Argue (Weston Solutions, Inc.)		
Time Arrived:	8:50 AM	Time Departed:	10:50 AM
Date of Prior Inspection:	September 28, 2007 (Friday)		

II. Observations

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

Notes:

1- A limited amount of pavement cracking and spalling was observed. Further details are provided in Section III.

2- Two additional conditions were observed and are detailed in Sections III and IV (Items H1.a and H1.b).

GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS
BUILDING 71 AND HILL 78 ON-PLANT CONSOLIDATION AREAS (OPCAs)

POST-CLOSURE INSPECTION FORM

III. Inspection Observations

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

(Locations of the following items are depicted on the figure in Attachment B.)

A1. There is a limited amount of pavement cracking and/or spalling at the north edge of the paved access road (road section adjacent to the sound barrier wall).
C2. There is temporary fencing on the NW corner of the Hill 78 OPCA that is being used for the sanitary sewer/storm drain pipe re-route project.
D1. Sparse vegetation was observed on the northern final cover sideslope at the Hill 78 and Building 71 OPCA transition.
D3. Animal burrow holes were noted at several locations on the Building 71 OPCA.
H1.a A dead tree fell at the northwest corner of the Building 71 OPCA.
H1.b Degraded hay bales were observed in the eastern corner of the Southern Sedimentation Basin.

IV. Inspection Response Actions

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

A1. Cracks and/or spalling noted at the pavement edge do not significantly affect the use or function of the access road. This condition will be reassessed during Fall 2008 inspection.
C2. Permanent fencing should be installed after completion of the sanitary sewer/storm drain pipe re-routing project.
D1. The location of sparse vegetation should be reseeded and mulched.
D3. The burrowing animals should be removed from the OPCAs and the burrow holes filled with topsoil, seeded, and mulched.
H1.a The dead tree and branches should be removed and disposed of.
H1.b The degraded hay bales should be removed from the Southern Sedimentation Basin.

V. Prior Inspections

Describe response actions conducted to address prior maintenance needs.

N/A (No maintenance needs were identified in the Fall 2007 inspection.)

VI. Other Observations

N/A

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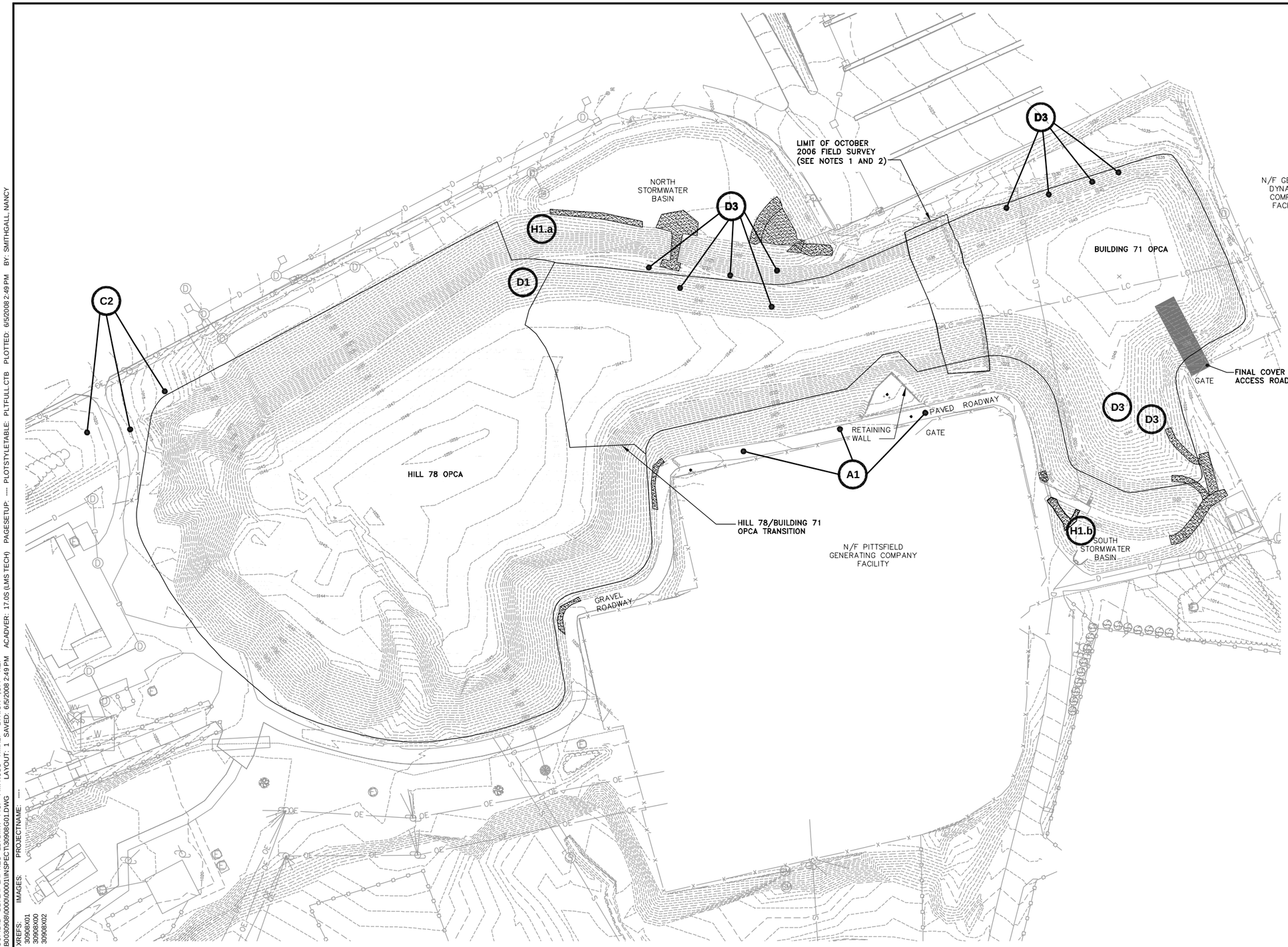
Attachment 2

Site Figure



LEGEND:

- SURVEY BENCHMARK
- CATCH BASIN
- DRAIN MANHOLE
- ELECTRIC MANHOLE
- UTILITY POLE
- FIRE HYDRANT
- BOLLARD
- WELL
- TREE
- RIPRAP
- CENTERLINE DITCH
- DRAINAGE LINES
- CHAIN LINK FENCE
- WOOD STOCKADE FENCE
- NEW CONTOUR LINES
- 1000 INDEX CONTOUR LINE
- INTERMEDIATE CONTOUR LINE
- VEGETATION
- LC LEACHATE COLLECTION FORCEMAIN
- E UNDERGROUND ELECTRIC LINES
- CULVERT
- LIMIT OF FLEXIBLE MEMBRANE LINER
- D3 INSPECTION OBSERVATION ITEM (SEE NOTE 6)

NOTES:

1. BASEMAP INFORMATION BASED ON FIELD SURVEY INFORMATION OBTAINED FROM SK DESIGN GROUP, INC. ON OCTOBER 6, 2006, DECEMBER 11, 2006, AND JANUARY 30, 2008. ADDITIONAL BASEMAP INFORMATION BASED ON "EXISTING SITE PLAN" PREPARED BY ARCADIS BBL, DATED APRIL 2007.
2. OCTOBER 2006 FIELD SURVEY INFORMATION REPRESENTS TOP OF WASTE (I.E., NOT TOP OF FINAL COVER REPRESENTATIVE OF CURRENT CONDITIONS).
3. ELEVATIONS SHOWN ARE REFERENCED TO NATIONAL GEODETIC VERTICAL DATUM (NGVD 1929).
4. HORIZONTAL DATUM IS REFERENCED TO THE MASSACHUSETTS STATE PLANE COORDINATE SYSTEM (NAD 1927).
5. CONTOUR INTERVAL EQUALS 1 FOOT.
6. INSPECTION OBSERVATION ITEMS CORRESPOND TO THE INSPECTION OBSERVATIONS DESCRIBED IN THE MAY 16, 2008 POST-CLOSURE INSPECTION FORM.

CITY: SYR-NY DIV/GROUP:141 DB: LAF NES LD: DMW PIC: PM: NUSS TM:RLP LYR:ON=*;OFF=*REF* ACADVER: 17.0S (LMS TECH) PAGESETUP: ----
G:\CAD\GE-CAD\N-ACT\B0030908\0000\00001\INSPECT\30908G01.DWG LAYOUT: 1 SAVED: 6/5/2008 2:49 PM PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 6/5/2008 2:49 PM BY: SMITHGALL, NANCY
XREFS: 30908X01 30908X00 30908X02 IMAGES: PROJECTNAME: ----

1"=60' (60' 0 60' 120')

THIS BAR REPRESENTS ONE INCH ON THE ORIGINAL DRAWING: USE TO VERIFY FIGURE REPRODUCTION SCALE

No.	Date	Revisions	By	Ckd

Professional Engineer's Name: **JAMES M. NUSS**
Professional Engineer's No.: 38000

State	Date Signed	Project Mgr.
MA		PHB
Designed by	Drawn by	Checked by
PHB	LAF	RLP

ARCADIS U.S., INC.

GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
HILL 78 AND BUILDING 71 OPCAs

POST CLOSURE INSPECTION MAY 16, 2008

GENERAL

ARCADIS Project No. 30908.0000.00001
Date JUNE 2008

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6723 TOWPATH ROAD
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Attachment 3

Photographs

Description: View of Building 71 OPCA southern sideslope (looking west)

Description: View of Building 71 OPCA northern sideslope (looking northwest)

Description: View of Building 71 OPCA plateau (looking west)

Description: View of Hill 78 OPCA northern sideslope (looking northwest)

Description: View of North Sedimentation Basin (looking northwest)

Description: View of South Sedimentation Basin (looking west)

Description: View of Building 71 OPCA southern sideslope (looking west)

Description: View of Hill 78 OPCA plateau (looking west)