



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

November 21, 2007

Mr. Dean Tagliaferro
United States Environmental Protection Agency
c/o Weston Solutions, Inc.
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 October 2007 Inspection Activities for the Remediated Phase 2 Floodplain
Properties**

Dear Mr. Tagliaferro:

On October 24, 2007, the General Electric Company (GE) performed the initial post-remediation inspection of the Phase 2 properties located within the floodplain adjacent to the 1½ Mile Reach of the Housatonic River that were subject to remediation. In accordance with GE's approved *Revised Supplemental Soil Evaluation Report and Removal Design/Removal Action Work Plan Addendum for Selected Phase 2 Floodplain Properties Adjacent to the 1½ Mile Reach of Housatonic River* (Revised RD/RA Addendum, March 2007), GE conducted soil remediation activities at two residential properties (Parcels I8-4-201/202 and Parcels I8-4-2, -3, -4) and one non-residential property (Parcel I8-4-7) in Phase 2, completing those actions in October 2007. These properties are shown on Figure 1. The initial post-remediation inspection of these properties was conducted in accordance with the requirements of Section 6.3 of the Revised RD/RA Addendum and focused on the areas that were backfilled and restored during the implementation of the remediation actions. However, at the time of the inspection, the tree and shrub planting called for by the Tree/Shrub Restoration Plan included in GE's *Addendum to Supplemental Information Package for Selected Phase 2 Floodplain Properties* (July 30, 2007), which provided for such plantings at Parcels I8-4-201/202 and I8-4-2, -3, -4, had not been completed.

Summary of Inspection Activities

As required by Section 6.3 of the Revised RD/RA Addendum, the October 2007 inspection consisted of observations of the backfilled/restored areas, focusing on 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 backfill materials; and (d) other conditions that could jeopardize the completed remediation. The results of the October 2007 inspection are included in an Inspection Summary and Checklist for each property (Attachment A).

Summary of Observations During Inspection

As indicated on the forms in Attachment A, the October 2007 inspection indicated that the backfilled/restored areas at the inspected properties were in good condition, but there was some uneven ground/grading work at all three properties that should be monitored in the spring of 2008. The inspection also indicated that the trees and shrubs that were to be planted on Parcels I8-4-201/202 and I8-4-2, -3, -4 had not yet been installed. Subsequent to the October 24, 2007 inspection, the Tree/Shrub Restoration Plan was revised as a result of a verbal agreement between GE and EPA. That revised plan is shown on the attached revised Table E-2 (Attachment B). The trees and shrubs were installed on Parcels I8-4-201/202 and I8-4-2, -3, -4 during the week of October 29, 2007 in accordance with that revised plan. The condition of the above-referenced ground/grading work will be checked during the spring 2008 inspection.

Schedule for Future Monitoring

Revised Post-Removal Site Control Plans will be included in the Final Completion Reports for the Removal Actions for the 1½ Mile residential floodplain properties and the 1½ Mile non-residential floodplain properties. Future inspections of the remediated/restored areas at the above-referenced Phase 2 properties will be conducted in accordance with the applicable requirements of those plans. It is anticipated that the backfilled/restored areas will be inspected two times per year in 2008 (in May and August or September) and annually thereafter (subject to EPA approval of a different frequency), as well as after severe storms, and that the newly planted vegetation will be inspected twice a year (in May and August or September) for a two-year period to assess the condition of the vegetation. These inspections will utilize the Inspection Summary and Checklist forms included in the Final Completion Reports. Within 30 days following each inspection, an inspection report will be prepared and submitted to EPA.

Please call me if you have any comments or questions.

Sincerely

Handwritten signature of Richard W. Gates in black ink, with the initials "RME" written at the end of the signature.

Richard W. Gates
Remediation Project Manager

Attachments

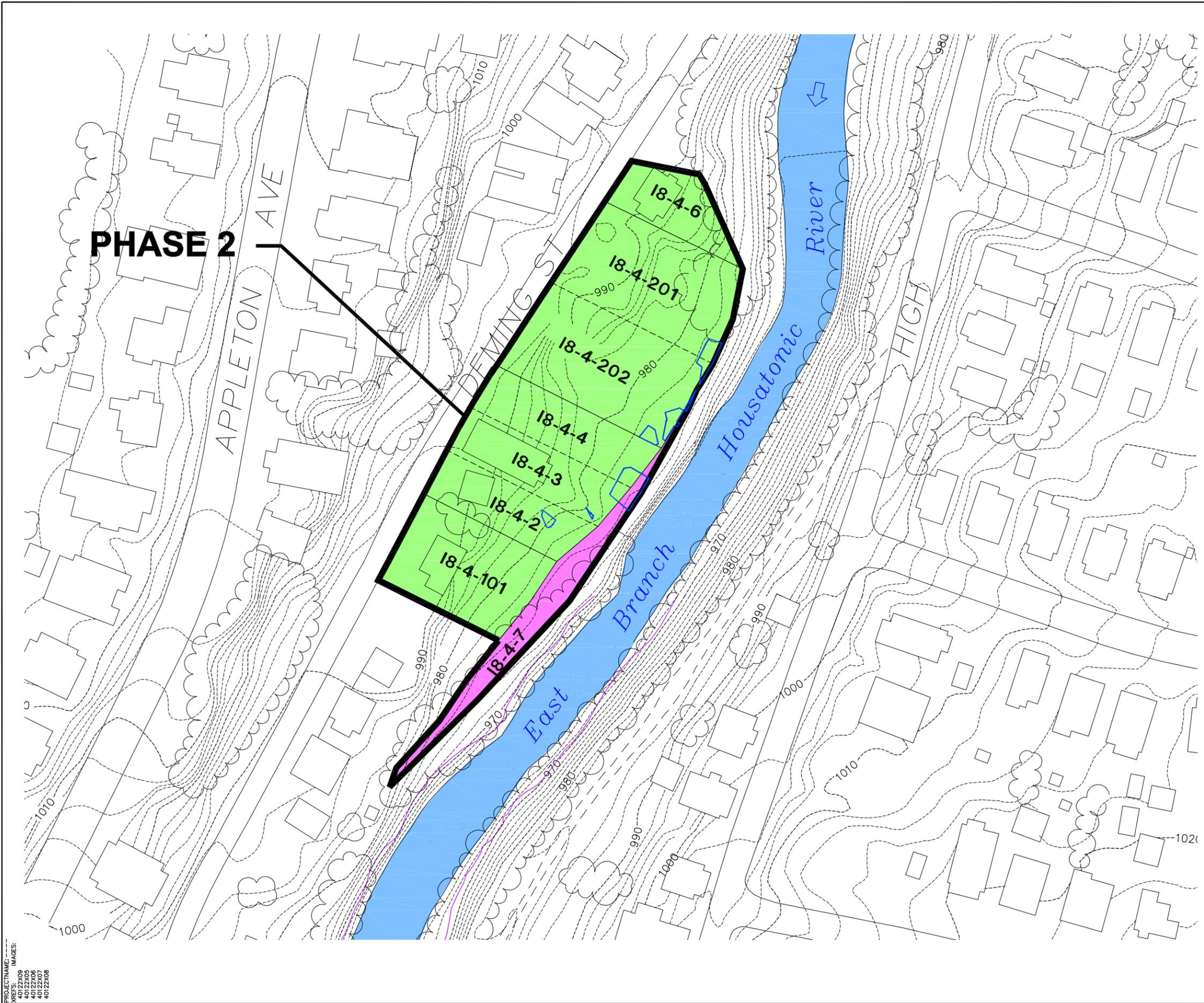
cc: Tim Conway, EPA
Rose Howell, EPA*
Holly Inglis, EPA
K.C. Mitkevicius, USACE
Linda Palmieri, Weston
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Nancy E. Harper, MA AG*
Dale Young, MA EOE*
Mayor James Ruberto, City of Pittsfield
Jeffrey Bernstein, BCK Law, P.C.

Michael Carroll, GE*
Andrew Silber, GE
Rod McLaren, GE*
Peter Wojcik, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter
Property Owner - Parcels I8-4-201/202
Property Owner - Parcels I8-4-2, -3, -4
Public Information Repositories
GE Internal Repository

* cover letter only

Figure

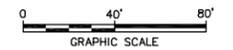
[SYR-85-DWM] SYR-85-NEW LAF KLS LAYER: ON* OFF=REF*
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LEGEND

- BOUNDARY OF FLOODPLAIN PROPERTIES AS REVISED BY EPA (FOR PHASE 2)
- PROPERTY BOUNDARY
- BOUNDARY BETWEEN COMMONLY OWNED TAX PARCELS
- 18-4-4** PROPERTY ID
- 10 YEAR FLOODPLAIN
- VEGETATION
- INDEX ELEVATION CONTOUR
- INTERMEDIATE ELEVATION CONTOUR
- PAVED ROADWAY
- UNPAVED ROADWAY OR TRAIL
- 1 1/2 MILE REACH
- RESIDENTIAL FLOODPLAIN PROPERTIES - ACTUAL/POTENTIAL LAWN AREA, AS DESIGNATED IN SOW
- NON-RESIDENTIAL/NON-COMMERCIAL FLOODPLAIN PROPERTIES - NON-BANK AREA, AS DESIGNATED IN SOW
- LIMITS OF SOIL REMOVAL

- NOTES:**
1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
 2. PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION.
 3. THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
OCTOBER 2007 INSPECTION

SITE PLAN

ARCADIS BBL
infrastructure, environment, facilities

FIGURE
1

Attachment A

Completed Inspection Forms

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

PARCEL I8-4-201/202

I. GENERAL INFORMATION

Inspection Date: 10/24/07
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 60°F
Date of Last Inspection: NA

II. INSPECTION SUMMARY

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

- All areas in good condition.

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

- Trees/shrubs have not been installed to date.

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.)*

- Some uneven ground/grading.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Monitor uneven ground/grading work in spring.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

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

PARCEL I8-4-7

I. GENERAL INFORMATION

Inspection Date: 10/24/07
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 60°F
Date of Last Inspection: NA

II. INSPECTION SUMMARY

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

- All areas in good condition.

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

- Grass 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.)*

- Some uneven ground/grading work.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Monitor uneven ground/grading work in spring.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

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

PARCEL I8-4-2, -3, -4

I. GENERAL INFORMATION

Inspection Date: 10/24/07
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 60°F
Date of Last Inspection: NA

II. INSPECTION SUMMARY

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

- All areas in good condition.

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

- Trees have not been installed to date.

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.)*

- Some uneven ground/grading.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Monitor uneven ground/grading work in spring.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

Attachment B

Revised Tree/Shrub Planting Plan

**TABLE E-2
TREE/SHRUB PLANTING PLAN**

**PROPERTIES ADJACENT TO 1 1/2 MILE REACH OF HOUSATONIC RIVER
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Parcel(s)	Type (inches in diameter)	Quantity	Species
18-4-2,-3,-4	Tree (1.5 - 2")	1	Crimson King Maple
	Tree (1.5 - 2")	2	Flowering Dogwood (<i>Cornus florida</i>)
	Tree (1.5 - 2")	6	Sugar Maple (<i>Acer saccharum</i>)
18-4-201/202	Tree (1.5 - 2")	1	Black Cherry (<i>Prunus serotina</i>)
	Shrub	1	Box Elder (<i>Acer negundo</i>)
	Shrub	1	Staghorn Sumac (<i>Rhus typhina</i>)
	Tree (1.5 - 2")	7	Sugar Maple (<i>Acer saccharum</i>)

Notes:

1. Small trees/shrubs (i.e., box elders, sugar maples, and any substitutions) shall be a minimum of four feet in height.
2. Tree/shrub restoration activities shall be performed in accordance with Materials and Performance Section 02210 - Floodplain Tree and Shrub Planting included in Attachment A to the *Addendum to Supplemental Information Package for Selected Phase 2 Floodplain Properties*.