GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

July 11, 2007

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 May 2007 Inspection Activities for the Phase 4 Floodplain Properties

Dear Mr. Tagliaferro:

On May 25, 2007, the General Electric Company (GE) performed its second 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 summer 2006, and those portions of the properties that were subject to remediation by GE were inspected.

GE conducted the initial post-remediation inspection of these properties on September 20, 2006. A summary of the September 2006 inspection activities was submitted to the U.S. Environmental Protection Agency (EPA) in a letter dated October 11, 2006. On May 25, 2007, GE conducted the second post-remediation inspection of these properties 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*. Consistent with the initial inspection, this inspection was performed for areas that were backfilled and restored during the implementation of the remediation actions.

Summary of Inspection Activities

The May 2007 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.

The May 2007 inspection also included observations of properties/areas at which the need for follow-up activities had been identified during the prior inspection. As indicated in GE's October 11, 2007 report related to the September 2006 inspection, follow-up activities included: checking the condition of trees and shrubs and reseeding certain areas following tree/shrub installations. Other follow-up activities were primarily related to Parcel I7-1-101 and included: 1) verifying that tire ruts within the tree planting area had been addressed and 2) verifying that adequate vegetation had been established between the top-of-bank and the paved access road and in the unpaved access road following restoration activities. All of these areas were observed in good overall condition during the May 2007 inspection.

To document the results of the May 2007 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.

Summary of Observations During Inspection

In summary, the May 2007 inspection indicated that some of the Phase 4 properties will require minor maintenance. As noted on the attached forms, maintenance activities include:

4A properties:

- Monitoring stressed/sparse vegetation on Parcel I7-1-101.

4B properties:

- Replacing 2 dead pine trees on Parcel I6-1-66 (to be replaced by EPA).

4C properties:

- Replacing dead 1.5- to 2-inch diameter maple trees and monitoring stressed trees on Parcels I6-1-62, -103, -104, and -106;
- Replacing dead riverbank maples and monitoring stressed trees on Parcels I6-1-62, -103, -104, and -106; and
- Informing the City of Pittsfield about a manhole breach.

GE will coordinate with EPA to replace the pine tree on Parcel I6-1-66. The other trees referenced above will be replaced prior to the fall 2007 inspection (based on tree availability and weather conditions). In addition, the condition of the trees and vegetation showing signs of stress will be checked during the fall 2007 inspection to ensure adequate growth. Finally, GE has informed the City of Pittsfield of the manhole breach.

Schedule for Future Inspections

In accordance with Technical Attachment J to the SOW, backfilled/restored areas are to be inspected approximately every 6 months for a period of one year and annually thereafter (subject to EPA approval of a different frequency). Future inspections are anticipated to occur in the fall of each year. 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

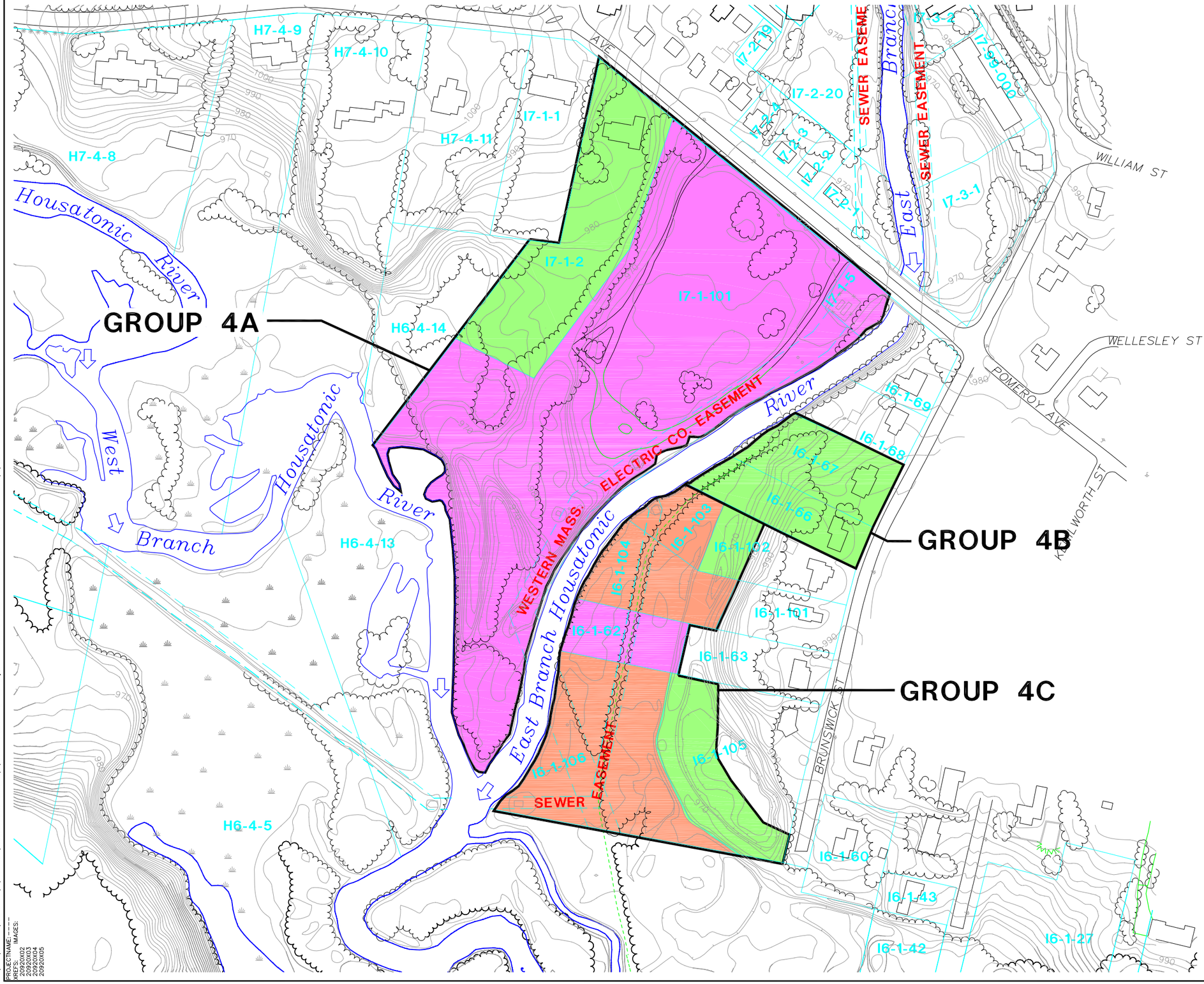
Richard Gates
Remediation Project Manager

Attachment

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 EOEA*
Mayor James Ruberto, City of Pittsfield*
Linda Palmieri, Weston
Michael Carroll, GE*
Andrew Silfer, GE
Rod McLaren, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter
Property Owner – Parcel I6-1-62
Property Owner – Parcel I6-1-66
Property Owner – Parcel I6-1-67
Property Owner – Parcel I6-1-102
Property Owner – Parcel I6-1-105
Property Owner – Parcel I7-1-2
Property Owner – Parcel I7-1-5
Property Owner – Parcel I7-1-101
Public Information Repositories
GE Internal Repository

* *cover letter only*

Figure



LEGEND:

- PAVED ROADWAY
- UNPAVED ROADWAY OR TRAIL
- VEGETATION
- INDEX ELEVATION CONTOUR
- PROPERTY BOUNDARY
- I7-1-2 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
MAY 2007 INSPECTION

SITE PLAN

ARCADIS BBL
infrastructure, environment, facilities

FIGURE
1

SYR-85-BGP GMS DMW LAYER: ON=*, OFF=REF
G:\CAD\GE-CAD\GE_ACTIVE\N\20920001\20920G02.DWG SAVED:6/6/2007 12:35 PM LAYOUT:Layout1 PAGESETUP:DL2B-PDF PENTABLE:PLTFULL.CTB PRINTED:6/6/2007 12:35 PM BY:DWODARCZYK
PROJECTNAME: ----
XREFS: IMAGES:
20920X02
20920X03
20920X04
20920X05

ARCADIS BBL

Attachment A

Inspection Summary and Checklist

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:	5/25/2007
Conducted By:	Paolo Filippetti
Weather Conditions:	Sunny 80°F
Date of Last Inspection:	9/20/2006

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.)*

- Stressed/sparse cover along path to confluence (EPA responsibility).

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.)*

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Monitor stressed/sparse vegetation.

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:	5/25/2007
Conducted By:	Paolo Filippetti
Weather Conditions:	Sunny 80°F
Date of Last Inspection:	9/20/2006

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.)*

- Two dead pines (EPA responsibility).

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.)*

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- EPA to replace two dead pines.

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:	5/25/2007
Conducted By:	Paolo Filippetti
Weather Conditions:	Sunny 80°F
Date of Last Inspection:	9/20/2006

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.)*

- All areas 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.)*

- None

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:	5/25/2007
Conducted By:	Paolo Filippetti
Weather Conditions:	Sunny 80°F
Date of Last Inspection:	9/20/2006

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.)*

- Numerous 1.5- to 2-inch diameter maple trees are stressed and/or dead.
- Several riverbank maples (wetland plantings) are stressed and/or dead.

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.)*

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Replace 1.5- to 2-inch diameter maples and monitor stressed trees.
- Replace dead riverbank maples and monitor stressed trees.

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:	5/25/2007
Conducted By:	Paolo Filippetti
Weather Conditions:	Sunny 80°F
Date of Last Inspection:	9/20/2006

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.)*

- All areas 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.)*

- None

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 I6-1-103 (Group 4C)

I. GENERAL INFORMATION

Inspection Date:	5/25/2007
Conducted By:	Paolo Filippetti
Weather Conditions:	Sunny 80°F
Date of Last Inspection:	9/20/2006

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.)*

- Numerous 1.5- to 2-inch diameter maple trees are stressed and/or dead.
- Several riverbank maples (wetland plantings) are stressed and/or dead.

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.)*

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Replace 1.5- to 2-inch diameter maples and monitor stressed trees.
- Replace dead riverbank maples and monitor stressed trees.

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:	5/25/2007
Conducted By:	Paolo Filippetti
Weather Conditions:	Sunny 80°F
Date of Last Inspection:	9/20/2006

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.)*

- Numerous 1.5- to 2-inch diameter maple trees are stressed and/or dead.
- Several riverbank maples (wetland plantings) are stressed and/or dead.

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.)*

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Replace 1.5- to 2-inch diameter maples and monitor stressed trees.
- Replace dead riverbank maples and monitor stressed trees.

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:	5/25/2007
Conducted By:	Paolo Filippetti
Weather Conditions:	Sunny 80°F
Date of Last Inspection:	9/20/2006

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.)*

- All areas 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.)*

- None

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 I6-1-106 (Group 4C)

I. GENERAL INFORMATION

Inspection Date:	5/25/2007
Conducted By:	Paolo Filippetti
Weather Conditions:	Sunny 80°F
Date of Last Inspection:	9/20/2006

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.)*

- Numerous 1.5- to 2-inch diameter maple trees are stressed and/or dead.
- Several riverbank maples (wetland plantings) are stressed and/or dead.

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.)*

- Sewer manhole box along southern boundary of Parcel I6-1-106 has been breached. Manhole is located at junction of north/south trunk line and west trunk line that crosses Housatonic River just south of confluence.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Replace 1.5- to 2-inch diameter maples and monitor stressed trees.
- Replace dead riverbank maples and monitor stressed trees.
- Inform City of Pittsfield about manhole breach.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE