



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted via Overnight Courier*

October 17, 2006

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 (GEC220)  
Summary of September 2006 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 the first post-closure inspection of the Building 71 On-Plant Consolidation Area (OPCA). The post-closure inspection was performed on GE's behalf by BBL, an ARCADIS company, on September 8, 2006, and included the portion of the Building 71 OPCA that was subject to final cover installation in 2005 and spring of 2006. This completed portion of final cover is referred to as the Phase I final cover and is approximately 2.5 acres in size.

Provided below is a description of the inspection activities performed during the September 2006 inspection of the Phase I final cover and associated components, as well as a summary of the results of the inspection, including the items identified as requiring maintenance.

### **Inspection Activities**

In accordance with Section 9 of the Detailed Work Plan, the September 8, 2006 post-closure inspection consisted of visual observations of the Phase I final cover and surrounding areas to identify the overall condition of the final cover and associated components, as well as items needing maintenance. The Phase I final cover itself 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;
- final cover access road;
- surface water drainage system, including the North and South stormwater basins;
- leachate handling system; and
- perimeter vegetation.

The conditions that were inspected at each of these components are listed on the inspection form used during the inspection, which is provided as Attachment A to this letter.

### **Inspection Results**

The results of the post-closure inspection were recorded on the inspection form provided as Attachment A to this letter. This inspection form presents details of the maintenance items identified during the inspection, as well as proposed repair activities. A site figure is also attached to this letter as Attachment B that shows (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 September 8, 2006 post-closure inspection indicated that Phase I of the Building 71 OPCA final cover was in good overall condition. As shown on the inspection form, six general items were noted during the inspection as needing maintenance, some of which include multiple locations and/or multiple questions on the form. The more significant of these maintenance items are:

- minor sideslope erosion of the final cover topsoil layer;
- sediment and debris accumulation within the perimeter ditches and culvert pipes; and
- sediment accumulation and sideslope erosion within the South stormwater basin.

Further details regarding the six maintenance items noted during the 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 C). It is anticipated that repair of the noted items (excluding the tank access covers) will be performed by the site contractor within the next two weeks. Repainting of the tank access covers will be performed in the spring of 2007 to ensure adequate preparation and drying temperatures.

### **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 second post-closure inspection will be performed in the spring of 2007, and will include the Phase II final cover if it has been completed. 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 include a progress review of the maintenance activities identified during the prior inspection period.

Please call me if you have any comments or questions concerning the September 8, 2006 inspection.

Sincerely,



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)  
Anna Symington, MDEP\*  
Jane Rothchild, MDEP\*  
Linda Palmieri, Weston (2 copies)  
Nancy E. Harper, MA AG\*  
Dale Young, MA EOEA\*  
Tom Hickey, Director, PEDDA  
Mayor James Ruberto, City of Pittsfield

Pittsfield Department of Health  
Michael Carroll, GE\*  
Andrew Silfer, GE  
Roderic McLaren, GE\*  
James Nuss, BBL  
James Bieke, Goodwin Procter  
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*\*cover letter only*

# *Attachment A*

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## **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: September 8, 2006 Weather Conditions: Sunny 70° F  
 Inspection Area: Building 71 OPCA Phase I Final Cover area and ancillary site components  
 Performed by: Philip Batten/Rachel Parini  
 Time Arrived: 9:45 AM Time Departed: 12:55 PM  
 Date of Prior Inspection: N/A

**II. Observations**

**A. Site Access Road**

- 1. Is there excessive cracking, potholes, visible fissures, or spalling?  No  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 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

**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 right side column in Section II. Use additional pages if necessary.

(Locations of the following identified items [except for item H.1] are depicted on the figure in Attachment B).

- A1. A pothole was observed at the end of the paved site access road near Hill 78.
- D2. Sideslope erosion was noted in five separate locations. Two locations should be addressed (D2A): one at the eastern slope convergence above the mid-slope swale, and one at the western slope convergence also above the mid-slope swale. The three remaining locations (D2B) should be monitored.
- E2, E3, E5. Excessive vegetation growth and sediment accumulation were observed within the perimeter ditches and drainage/culvert pipes. In addition, debris accumulation was also observed within some of the culvert pipes.
- E4. Excessive vegetation growth and sediment accumulation, as well as erosion of the northern sideslope, adjacent to the paved site access road, was observed within the southern Sedimentation Basin. In addition, the silt screen within the southern Sedimentation Basin outlet structure is not functioning. Within the northern Sedimentation Basin, excessive vegetation growth and sediment accumulation was observed within the forebay area. Insufficient stone was observed around the northern and southern Sedimentation Basin outlet structures.
- F2. Tank access covers need to be painted.
- H1. Site needs to be mowed with minor seeding in select areas.

**IV. Inspection Response Actions**

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

- A1. Pothole should be repaired.
- D2. Sideslope erosion should be filled with topsoil, regraded, seeded and lined with a temporary erosion control mat.
- E2, E3, E5. Perimeter ditches should be mowed and sediment accumulation removed to restore ditches to design depth. The entire north perimeter ditch, as well as the entire south perimeter ditch east of the retaining wall, should also be regraded and seeded. Temporary erosion control mat should be installed within regraded portion of ditch.
- E4. Sedimentation Basins should be mowed. Sediment should be removed from the south Sedimentation Basin floor as needed to restore original design elevations. The silt screen within the south Sedimentation Basin should be removed. Additional stone should be placed around the northern and southern Sedimentation Basin outlet structures (i.e., a min. of 6 inches above outlet holes).
- F2. Tank access covers should be repainted as part of ongoing maintenance activities.
- H1. Final cover and adjacent areas should be mowed.

**V. Prior Inspections**

Describe response actions conducted to address prior maintenance needs.

N/A

**VI. Other Observations**

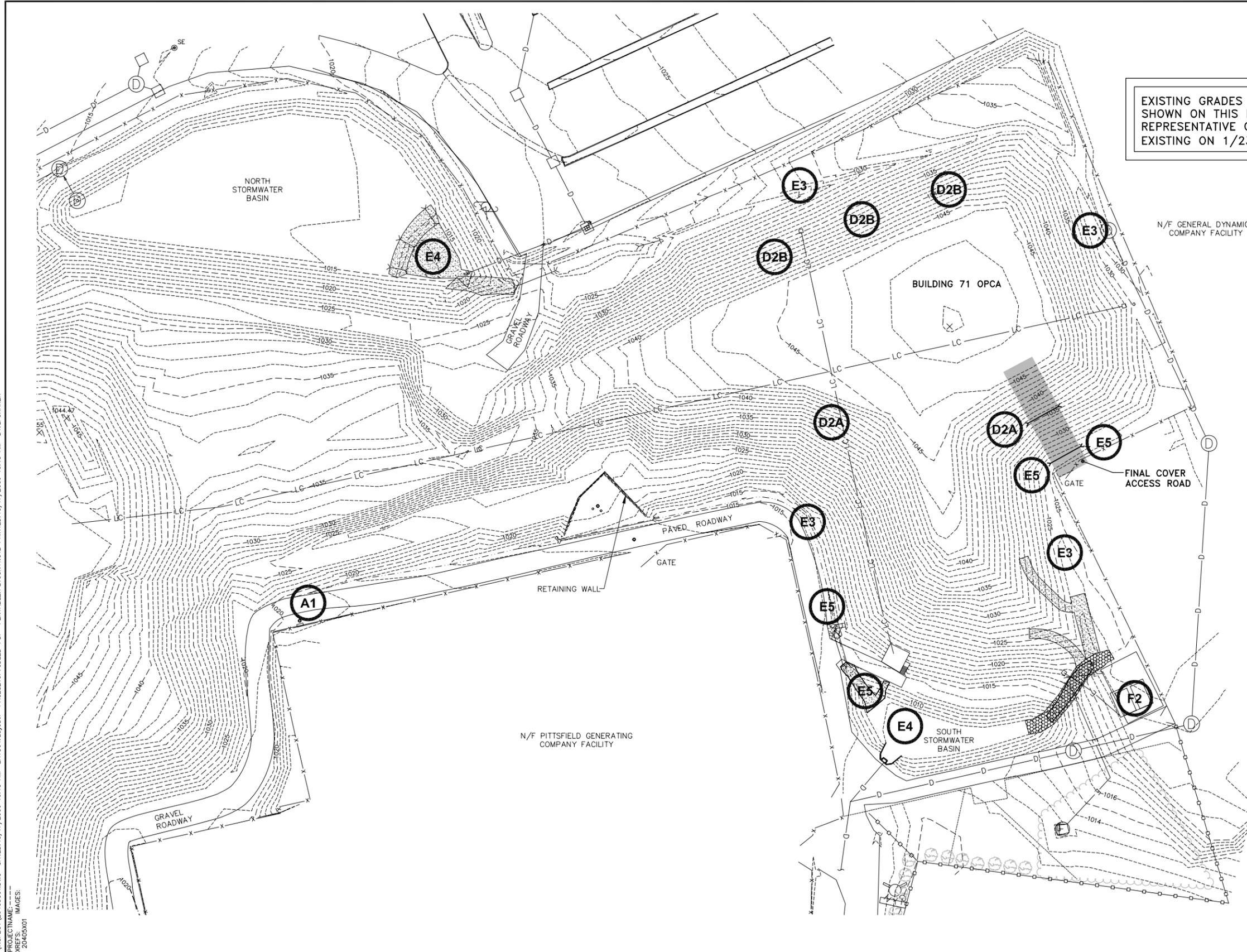
List any other relevant observations noted during this period.

# ***Attachment B***

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**Figure**

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 PAGES: 1 OF 10 LAYOUT: LAYOUT1 PAGES: 1 OF 10 PRINTED: 10/17/2006 10:13 AM BY: LFORAKER  
 IMAGES: 20405001



EXISTING GRADES AND FEATURES SHOWN ON THIS DRAWING ARE REPRESENTATIVE OF CONDITIONS EXISTING ON 1/23/06.

**LEGEND:**

- ⊙ SW SURVEY BENCHMARK
- CATCH BASIN
- ⊕ DRAIN MANHOLE
- ⊕ E ELECTRIC MANHOLE
- ⊕ U UTILITY POLE
- ⊕ F FIRE HYDRANT
- ⊕ B BOLLARD
- ⊕ W WELL
- ⊕ T TREE
- ▨ RIPRAP
- ▨ RENO MATTRESS
- CENTERLINE DITCH
- D DRAINAGE LINES
- x — x CHAIN LINK FENCE
- o — o WOOD STOCKADE FENCE
- - - 1000 INDEX CONTOUR LINE
- - - INTERMEDIATE CONTOUR LINE
- ~ VEGETATION
- LC LEACHATE COLLECTION FORCEMAIN
- E UNDERGROUND ELECTRIC LINES
- CULVERT
- ⊕ F2 INSPECTION OBSERVATION ITEM (SEE NOTE 5)

**NOTES:**

1. BASE MAP INFORMATION SHOWN ON THIS DRAWING FROM "EXISTING SITE PLAN" BY BLASLAND, BOUCK & LEE, INC. DATED APRIL, 2006.
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 SEPTEMBER 8, 2006 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

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

Professional Engineer's No.  
38000

State  
MA

Date Signed

Project Mgr. Designed by Drawn by  
PHB CAA LAF



GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS  
HILL 78 AND BUILDING 71 OPCAs  
**POST CLOSURE INSPECTION**  
**(SEPTEMBER 8, 2006)**

GENERAL

BBL Project No.  
204.05

Date  
OCTOBER 2006

Blasland, Bouck & Lee, Inc.  
an Arcadis company  
6723 Towpath Road  
Syracuse, NY 13214  
315-446-9120

# ***Attachment C***

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## **Photographs**



Description: View of southern culvert ends draining into Southern Sedimentation Basin.



Description: View of Southern Sedimentation Basin Outlet structure.



Description: View of leachate storage tanks.



Description: View of mid-slope drainage swale outlets located at southeastern corner of Building 71 OPCA.



Description: View of southwestern slope of Building 71 OPCA.



Description: View of exposed existing liner system in preparation for future tie-in.



Description: View of southern slope of Building 71 OPCA.



Description: View of vegetation and rip-rap at outlet structure with Southern Sedimentation Basin.



Description: View of southern culvert ends drainage into Southern Sedimentation Basin.



Description: View of southern slope of Building 71 OPCA.



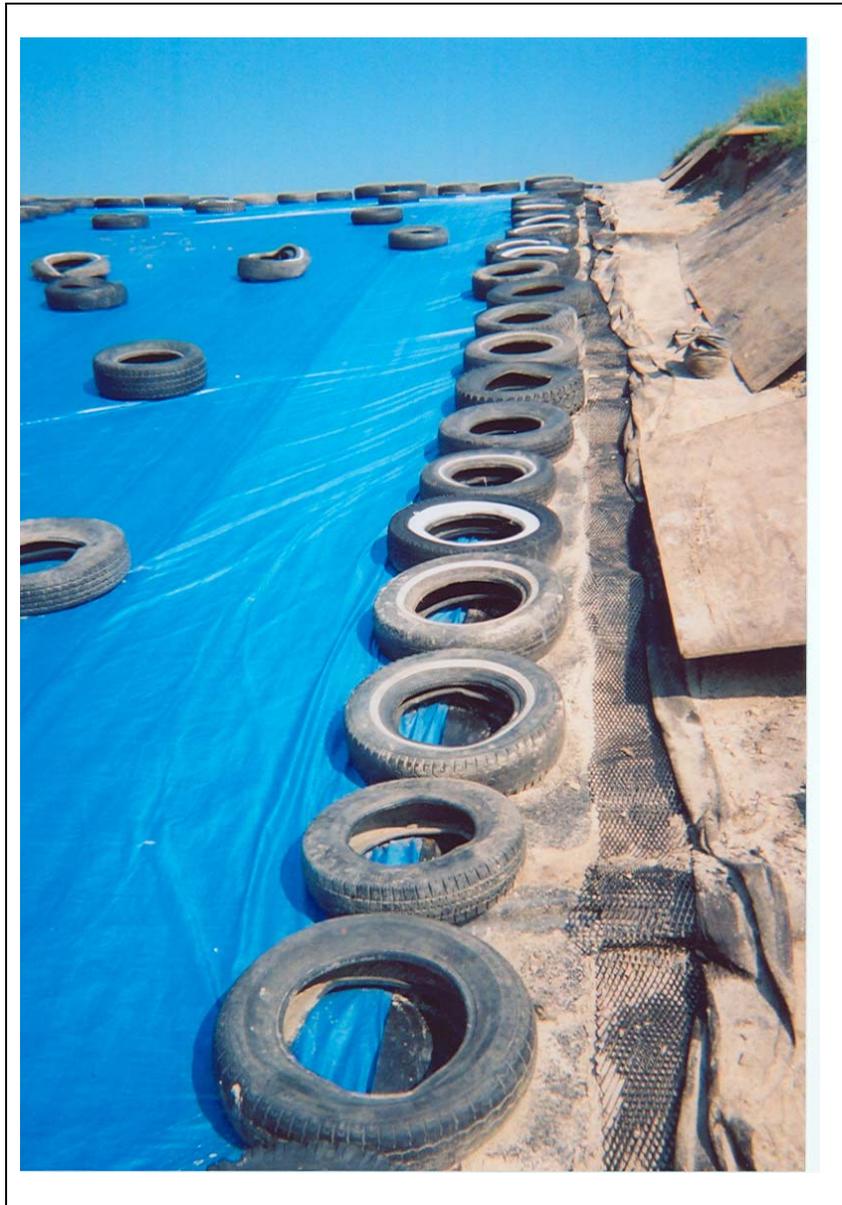
Description: View of Southern Sedimentation Basin (looking west).



Description: View of drainage swale located at eastern corner of Southern Sedimentation Basin.



Description: View of drainage pipe located along northern slope of Building 71 OPCA.



Description: View of exposed existing liner in preparation for future tie-in.



Description: View of an erosion fill on northern slope of Building 71 OPCA.