



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

June 8, 2011

Mr. Richard Fisher (Mail Code OSRR07-1)
United States Environmental Protection Agency
5 Post Office Square - Suite 100
Boston, MA 02109-3912

**Re: GE-Pittsfield/Housatonic River Site
Former Oxbow Areas J and K (GECD420)
Summary of May 2011 Vegetation Inspection Activities**

Dear Mr. Fisher:

On May 10, 2011, the General Electric Company (GE) performed a post-remediation inspection of the properties within the Former Oxbow Areas J and K Removal Action Area (RAA) at which remediation was performed. As shown on Figure 1, this RAA includes six commercial parcels (four of which have recreational areas within them), three recreational parcels, and two residential parcels. GE conducted remediation activities at all six of the commercial parcels (Parcels K10-13-1, K10-12-1, K10-11-1, K10-11-2, K10-11-3, and K10-11-5) and one residential property (Parcel K10-10-6), completing those activities in summer 2006. Vegetation restoration activities were subsequently conducted at these properties in accordance with the Revised Vegetation Restoration Plan for Former Oxbow Areas J and K, provided in Attachment 2 to GE's October 5, 2006 Addendum to Supplemental Information Package for this and other RAAs. Previous post-remediation inspections were performed semi-annually since November 2006 for the remediated properties at Former Oxbow Areas J and K. Summaries of these inspections were presented in prior letters to EPA. The most recent prior inspection was performed in September 2010, with the report on it dated October 8, 2010. This letter documents the results of the May 2011 inspection activities at these properties.

The May 2011 inspection was conducted in accordance with the Post-Removal Site Control requirements specified in GE's *Final Completion Report for the Former Oxbow Areas J and K Removal Action* (Final Completion Report), submitted to EPA on May 13, 2008 and approved by EPA on June 3, 2008. This inspection included observations of various trees/shrubs that were replanted at this RAA, as specified in the Final Completion Report or as subsequently agreed upon by GE and EPA, and as further described below. (The backfilled/restored areas at Former Oxbow Areas J and K are subject to annual inspections in August or September).

Figure 2 shows the areas subject to inspection at this RAA (including various specific items that are subject to the annual inspection in August or September, but were not required to be inspected in May 2011). Figure 3 contains the restoration planting plan for this RAA, as presented on Figure 4 from the Final Completion Report, and also lists the trees and shrubs that were replanted in 2008, 2009, and 2010, including the species, installation date, and size at the time of replanting.

Summary of Inspection Activities

For the revegetated areas at Former Oxbow Areas J and K, the required two-year monitoring period for the originally planted vegetation (including the herbaceous vegetative cover) ended in September 2009. The September 2010 inspection constituted the final inspection for the trees and shrubs replanted in July and October 2008. Further, the additional inspections that GE agreed (in a December 10, 2009 letter) to conduct at EPA's request of all planted American elms on Parcel K10-10-6, all planted choke cherries, silky dogwoods, and northern arrowwoods on Parcel K10-11-5, and all planted eastern cottonwoods on Parcel K10-12-1 were completed with the September 2010 inspection. However, the trees and shrubs replanted in June, October, and November 2009, and in August, October, and November 2010, as shown on Figure 3, were inspected in May 2011.¹ These plantings are located in Planting Area 2 (on Parcel K10-11-5), Planting Area 8 (on Parcel K10-11-2), Planting Areas 12 and 13 (on Parcel K10-12-1), and Planting Area 14 (on Parcel K10-10-6). In addition, an original choke cherry in Planting Area 1 (on Parcel K10-11-5) that had been identified as stressed in the September 2010 inspection was inspected in May 2011 at EPA's request, even though the monitoring period for that shrub ended with the September 2010 inspection, as noted above.

Observations of these plantings included a stem count (quantity per species per planting area) of the trees/shrubs subject to inspection at each area, including those that were in good health and those that were dead or dying or showing evidence of stress. The results of these observations were used to evaluate the survival and condition of the trees and shrubs subject to inspection. Additionally, each tree/shrub observed was measured to determine the average height and range of heights of each species of tree/shrub subject to inspection within each planting area. In conjunction with the tree and shrub observations, GE inspected tree cages, tree guards, and tree stakes (where present) to assess whether these items were functioning to protect the trees/shrubs from damage.²

In addition, the properties/areas where the need for follow-up maintenance or replanting activities had been identified during the September 2010 inspection were observed during the May 2011 inspection to confirm that those activities had been performed. These included the following activities:

- In Planting Area 8, installing a tree guard on one red maple;
- In Planting Area 1, fertilizing the stressed choke cherry mentioned above;
- In Planting Area 2, installing two choke cherries, three silky dogwoods, and one winterberry; gathering and properly storing the tree cages/guards that were removed during the September 2010 inspection (where applicable); and fertilizing one stressed choke berry; and
- In Planting Area 13, installing two eastern cottonwoods and gathering and properly storing the tree cages/guards that were removed during the September 2010 inspection from two dead eastern cottonwoods.

¹ A number of trees/shrubs have been removed from the replanted tree table on Figure 3 due to mortality and subsequent replanting. These included one eastern cottonwood replaced in July 2008 in Planting Area 8, one black willow replaced in June 2009 in Planting Area 8, two northern arrowwoods replaced in July 2008 and one replaced in June 2009 in Planting Area 2, two silky dogwoods replaced in July 2008 in Planting Area 2, and one winterberry replaced in November 2009 and one replaced in July 2008 in Planting Area 2. These plantings are no longer subject to inspection.

² Tree cages, guards, and stakes that were left in place longer than the two-year monitoring period for the associated tree/shrub will be inspected during future annual inspections (in August or September) until such time as those items are removed.

All of these activities had been completed prior to the May 2011 inspection, with the replanting having been performed in October and November 2010.

The results of the May 2011 inspection are included in an Inspection Summary and Checklist for each property subject to inspection, using the form included in the Final Completion Report. The completed inspection forms are provided in Attachment A. Parcels K10-11-1, K10-11-3, and K10-13-1 were not subject to inspection, and therefore no Inspection Summary and Checklist forms were included for these properties. Documentation of the tree/shrub observations is provided in Tables B-1 through B-11 in Attachment B. These tables list, for each species within each planting area, the number of trees/shrubs subject to inspection, the height of each individual tree/shrub counted, the condition of each tree/shrub counted, and the condition of the associated tree guard, cage, or stakes (where present).

Summary of Observations During Inspection

As indicated in the forms in Attachment A, the May 2011 inspection indicated that most of the trees and shrubs subject to inspection were in good condition. However, some of the trees and shrubs subject to inspection were identified as stressed or dead. The results of the tree/shrub counting, measuring, and observation activities at the planting areas are presented in detail in the tables in Attachment B. These results are summarized in the following table. In evaluating percent survival in areas where new species were planted in October 2009 and August 2010 to replace dead plantings of previously planted species (i.e., choke berries to replace choke cherries and northern arrowwoods), the replacement species plantings are considered together with the remaining plantings of the originally planted species.

Tree/Shrub Count Results									
Parcel	Planting Area	Species	Subject to Inspection in May 2011	Observed in Good Health	Observed Dead/Stressed ¹	Avg Height (ft.)	Range of Heights (ft.)	Percent in Good Health (%) ²	Percent Survival (%) ³
K10-10-6	14	American Elm	2	0	2/0	NA	NA	0	0
K10-11-2	8	Black Willow	2	0	0/2	3.5	1-6	0	100
		Eastern Cottonwood	2	2	0/0	5.0	4-6	100	100
K10-11-5	1	Choke Cherry ⁴	1	0	1/0	NA	NA	0	0
	2	Choke Cherry	7	5	0/0	3.4	3-4	100	100
		Choke Berry ⁵		2	0/0	5.0	5-5		
		Northern Arrowwood	16	3	0/0	3.0	3-3	100	100
		Choke Berry ⁶		13	0/0	4.0	4-4		
		Silky Dogwood	5	1	0/4	4.0	3-5	20	100
Winterberry	4	4	0/0	2.8	2-4	100	100		
K10-12-1	12	Eastern Cottonwood	1	1	0/0	8.0	8	100	100
	13	Eastern Cottonwood	2	2	0/0	5.5	5-6	100	100

Notes:

1. This column lists the number of trees/shrubs inspected that were dead and then the number that were alive but stressed.
2. This column lists the percentage of trees/shrubs inspected that were in good condition relative to the total quantity inspected.
3. This column shows the percentage of trees/shrubs inspected that were alive (including stressed plants) relative to the total quantity inspected.
4. This choke cherry was inspected in May 2011 at EPA's request because it had been identified as stressed in the September 2010 inspection, even though the monitoring period for that shrub was completed with the September 2010 inspection.
5. Although the October 22, 2009 letter report on the September 2009 inspection indicated that GE would replant two choke cherries in Planting Area 2, choke berries were inadvertently planted instead.
6. 13 choke berries were planted in Planting Area 2, with EPA agreement, to replace 13 dead northern arrowwoods observed during the May 2010 inspection.

In summary, the results of the tree/shrub counting activities indicated that, with respect to survival: (a) in four of the planting areas (Planting Areas 8, 2, 12 and 13), the trees/shrubs subject to inspection had a survival frequency of 100%; (b) in Planting Area 14, both of the trees subject to inspection were dead; and (c) the choke cherry in Planting Area 1 that had been identified as stressed in September 2010 was now dead. As also indicated above, six plantings were identified as stressed; these consisted of two replanted black willows in Planting Area 8 (one installed in October 2009 and one installed in August 2010) and four replanted silky dogwoods in Planting Area 2 (one installed in November 2009 and three installed in October 2010). The plantings identified as stressed during the inspection were equipped with a tag identifying the date of the inspection and condition of the planting. Plantings recorded as stressed on three consecutive inspections will be replaced.

As further indicated in the tables in Attachment B, the tree guards, cages, and stakes (where present) on the live trees and shrubs subject to inspection were in good condition.

Finally, the inspection confirmed that the follow-up activities that had been identified in the September 2010 inspection (listed above) had been performed.

Maintenance/Replanting Activities

Based on the May 2011 inspection, the following maintenance and replanting activities were identified:

- In Planting Area 14, install two American elms;
- In Planting Area 8, fertilize two stressed black willows;
- In Planting Area 1, install one choke cherry; and
- In Planting Area 2, fertilize four stressed silky dogwoods.

GE will fertilize the stressed plantings identified above later this June. Based on discussions with EPA, the new trees/shrub (i.e., two American elms and one choke cherry) will be installed this fall, following the August or September 2011 inspection, together with any other trees/shrubs that are identified for replanting in that inspection. GE will notify EPA (via email) prior to implementing any corrective measures for the plantings. The trees will be installed in accordance with the previously approved planting plan and will meet applicable requirements for species and type. GE will equip the replanted trees with a tag identifying the species, installation date, and general size at the time of installation. After the trees are replanted, GE will revise Figure 3 to include the species, installation date, and size at the time of replanting. The revised figure will be submitted to EPA prior to the inspection in May 2012 and will serve as the basis for that inspection.

Schedule for Future Inspections

Future inspections will be conducted in accordance with the Post-Removal Site Control requirements specified in the Final Completion Report and subsequent agreements between GE and EPA. As noted above, the September 2009 inspection constituted the last of the required inspections of the originally planted vegetation (including the herbaceous vegetative cover); and the September 2010 inspection constituted the final inspection of the trees and shrubs replanted in July and October 2008 and of the other trees/shrubs that GE agreed to continue to inspect in its December 10, 2009 letter, as described above. The trees and shrubs replanted in June, October, and November 2009 will be inspected again in August or September 2011. The trees and shrubs replanted in August, October, and November 2010 will be inspected again in August or September 2011 and twice per year (in May and August or September) in 2012. The trees and shrub that will be planted this fall will be inspected twice per year (in May and August or September) in 2012 and 2013.

In addition, the backfilled/restored areas will be inspected annually in August or September (subject to EPA approval of a different frequency), as well as after severe storms. Lastly, GE will inspect tree cages, guards, and stakes (where present) on trees/shrubs no longer subject to the two-year monitoring period during future annual inspections (in August or September) until such time as those items are removed.

Future inspections will utilize the Inspection Summary and Checklist forms included in the Final Completion Report. 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. The signature is written in a cursive style and includes the initials "RWB" at the end.

Richard W. Gates
Remediation Project Manager

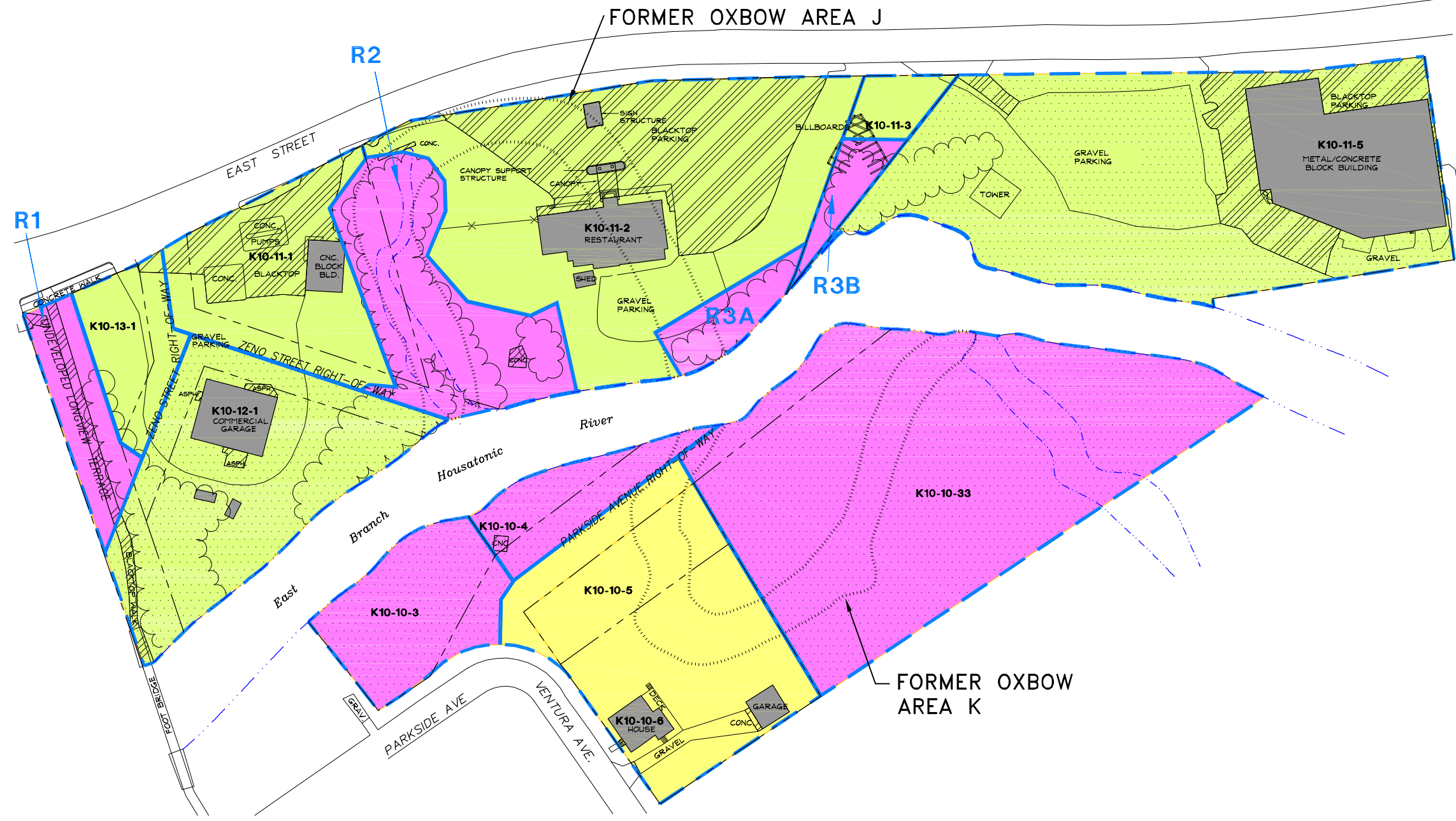
Attachments

cc: Dean Tagliaferro, EPA
Tim Conway, EPA*
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston (2 copies)
Robert Leitch, USACE
Michael Gorski, MDEP*
Eva Tor, MDEP*
John Ziegler, MDEP (2 copies)
Nancy E. Harper, MA AG*
Karen Pelto, MDEP*
Mayor James Ruberto, City of Pittsfield

Michael Carroll, GE*
Rod McLaren, GE*
Peter Wojcik, GE*
James Nuss, ARCADIS
James Bieke, Goodwin Procter
Property Owner – Parcel K10-10-6
Property Owner – Parcel K10-11-2
Property Owner – Parcel K10-11-5
Property Owner – Parcel K10-12-1
Public Information Repositories
GE Internal Repository

* cover letter only

CITY: SYRACUSE DIV/GROUP: 141 DB: DWM LAF GMS LD: DWM PM/Regd LVR: ON=OFF=REF TEXT: IMAP_NUM
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- LEGEND:**
- APPROXIMATE REMOVAL ACTION AREA BOUNDARY (EXCLUDING ACTUAL RIVERBANK AREAS)
 - RD/RA AVERAGING AREA BOUNDARY
 - PROPERTY LINE
 - K10-10-6** PROPERTY ID
 - R2** RECREATIONAL AREA ID
 - EDGE OF WATER
 - PAVED ROADWAY
 - VEGETATION
 - STREAMS WITH INTERMITTENT FLOW
 - FORMER OXBOW/LOW-LYING AREA
 - RECREATIONAL AREA (NON-GE-OWNED)
 - RECREATIONAL AREA PROPERTY (NON-GE-OWNED) EVALUATED UNDER RESIDENTIAL SCENARIO
 - COMMERCIAL PROPERTY (NON-GE-OWNED)
 - COMMERCIAL PROPERTY (NON-GE-OWNED) EVALUATED UNDER RESIDENTIAL SCENARIO
 - RESIDENTIAL PROPERTY
 - BUILDING OR PERMANENT STRUCTURE
 - PAVED AREA



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
FORMER OXBOW AREAS J & K

SITE PLAN


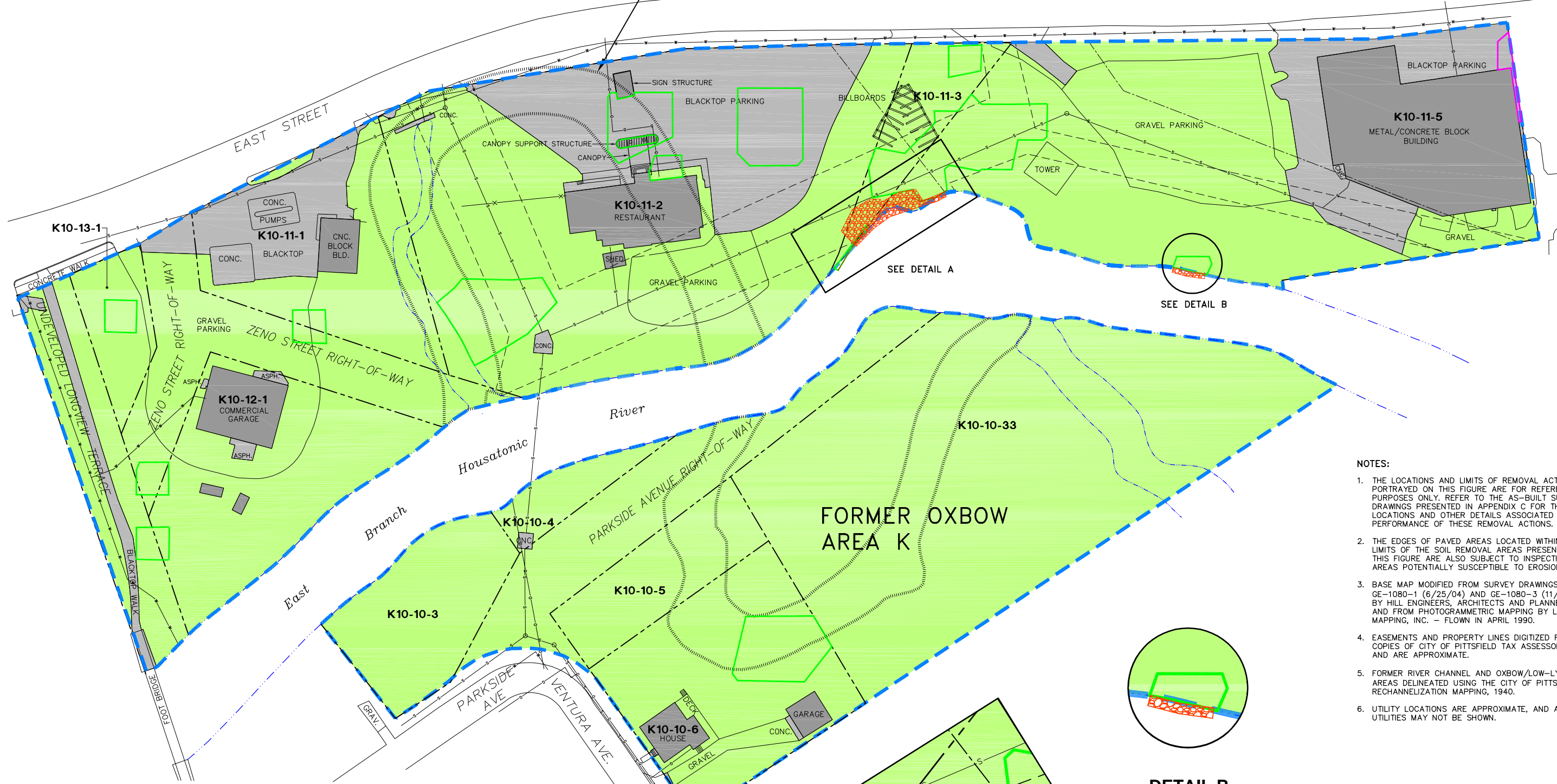


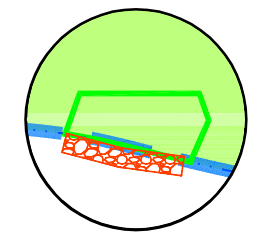
FIGURE
1

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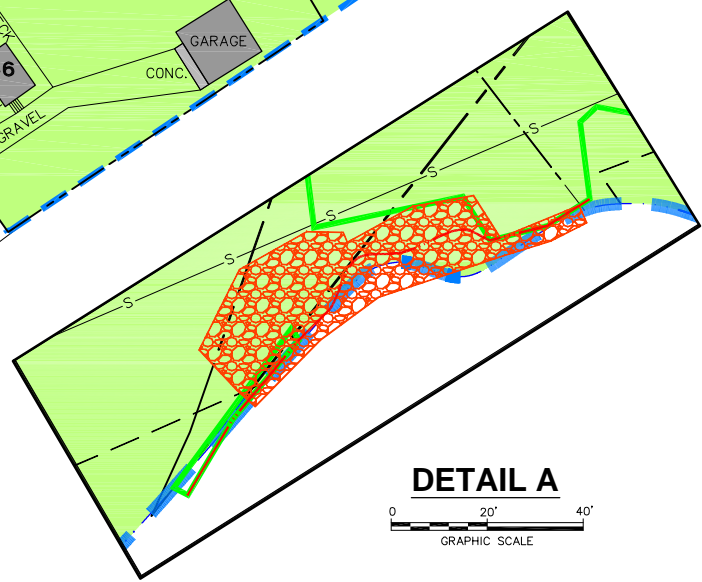
FORMER OXBOW AREA J



- NOTES:**
1. THE LOCATIONS AND LIMITS OF REMOVAL ACTIONS PORTRAYED ON THIS FIGURE ARE FOR REFERENCE PURPOSES ONLY. REFER TO THE AS-BUILT SURVEY DRAWINGS PRESENTED IN APPENDIX C FOR THE LOCATIONS AND OTHER DETAILS ASSOCIATED WITH THE PERFORMANCE OF THESE REMOVAL ACTIONS.
 2. THE EDGES OF PAVED AREAS LOCATED WITHIN THE LIMITS OF THE SOIL REMOVAL AREAS PRESENTED ON THIS FIGURE ARE ALSO SUBJECT TO INSPECTION AS AREAS POTENTIALLY SUSCEPTIBLE TO EROSION.
 3. BASE MAP MODIFIED FROM SURVEY DRAWINGS Nos. GE-1080-1 (6/25/04) AND GE-1080-3 (11/18/04) BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, INC. AND FROM PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1990.
 4. EASEMENTS AND PROPERTY LINES DIGITIZED FROM COPIES OF CITY OF PITTSFIELD TAX ASSESSORS MAPS AND ARE APPROXIMATE.
 5. FORMER RIVER CHANNEL AND OXBOW/LOW-LYING AREAS DELINEATED USING THE CITY OF PITTSFIELD'S RECHANNELIZATION MAPPING, 1940.
 6. UTILITY LOCATIONS ARE APPROXIMATE, AND ALL UTILITIES MAY NOT BE SHOWN.



DETAIL B
0 20' 40'
GRAPHIC SCALE



DETAIL A
0 20' 40'
GRAPHIC SCALE

LEGEND

- | | | | |
|--|---|--|---|
| | APPROXIMATE REMOVAL ACTION AREA BOUNDARY | | FENCE |
| | PROPERTY LINE | | APPROXIMATE SEWER LOCATION |
| | PROPERTY ID | | APPROXIMATE STORM DRAIN LOCATION |
| | WESTERN MASS. ELECTRIC CO. EASEMENT | | APPROXIMATE WATER MAIN LOCATION |
| | SEWER EASEMENT | | APPROXIMATE GAS LINE LOCATION |
| | STREAMS WITH INTERMITTENT FLOW | | LIMITS OF SOIL REMOVAL TO ACHIEVE PERFORMANCE STANDARDS |
| | CURRENT EDGE OF WATER (HILL SURVEYS, 7/12/06, 7/14/06, AND 7/20/06) | | AREA OF PAVEMENT SUBJECT TO INSPECTION DUE TO THE PRESENCE OF PCBs >10 PPM IN THE TOP FOOT OF UNDERLYING SOIL |
| | APPROXIMATE FORMER OXBOW/LOW-LYING AREA | | CANOPY SUPPORT STRUCTURE NOT SUBJECT TO INSPECTION |
| | BUILDING OR PERMANENT STRUCTURE | | RIPRAP |
| | PAVED AREA | | |
| | UNPAVED AREA | | |

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
FORMER OXBOW AREAS J & K

AREAS/ITEMS SUBJECT TO INSPECTION

FIGURE 2



Attachment A

Completed Inspection Checklists

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-10-6

I. GENERAL INFORMATION

Inspection Date: 5/10/2011
Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184
Weather Conditions: Sunny, 55-65° F
Date of Last Inspection: 9/10/2010

II. INSPECTION SUMMARY

1. Confirm that Figures 3 and 4 from the Final Completion Report and the as-built survey drawing included in Appendix C of the Final Completion Report (and any alternative plan proposed by GE) have been reviewed.
- Confirmed

2. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage outlets, drainage swales, or edges of paved areas, etc.)
- NA - subject to annual inspection in August or September

3. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of stressed/sparse cover], other landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and tree stakes; review the restoration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of planted trees and shrubs; and measure and record the size of all trees and shrubs subject to inspection.)
- Monitoring of vegetative cover was previously completed.
- Tree observations in Planting Area 14 are shown in Table B-1 in Attachment B; both American elms subject to inspection were observed to be dead.
- All tree guards, cages, and stakes had previously been removed by the property owner.

4. **Areas Potentially Susceptible to Erosion** (Inspect any other areas that are potentially subject to erosion as a result of the remediation, including drainage outlets, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence of any erosion. Include, where relevant, an inspection of the riverbank areas lined with riprap following remediation activities on Parcels K10-11-3 and K10-11-5; verify the integrity of these structures.)
- NA - subject to annual inspection in August or September

5. **Paved Area Subject to Inspection** (Inspect the paved area on Parcel K10-11-5 that is identified on Figure 3 of the Final Completion Report, and note evidence of any locations where the pavement is broken up and/or missing and soil is clearly visible.)
- NA

6. **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

- Install two American elms in Planting Area 14.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-2

I. GENERAL INFORMATION

Inspection Date: 5/10/2011
Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184
Weather Conditions: Sunny, 55-65° F
Date of Last Inspection: 9/10/2010

II. INSPECTION SUMMARY

1. Confirm that Figures 3 and 4 from the Final Completion Report and the as-built survey drawing included in Appendix C of the Final Completion Report (and any alternative plan proposed by GE) have been reviewed.

- Confirmed

2. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage outlets, drainage swales, or edges of paved areas, etc.)

- NA - subject to annual inspection in August or September

3. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of stressed/sparse cover], other landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and tree stakes; review the restoration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of planted trees and shrubs; and measure and record the size of all trees and shrubs subject to inspection.)

- Monitoring of vegetative cover was previously completed.

- Tree observations in Planting Area 8 are shown in Tables B-2 and B-3 in Attachment B; trees subject to inspection, as well as tree guards, cages, and stakes (where present), are in good condition except as follows:

* Two black willows were observed to be stressed.

4. **Areas Potentially Susceptible to Erosion** (Inspect any other areas that are potentially subject to erosion as a result of the remediation, including drainage outlets, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence of any erosion. Include, where relevant, an inspection of the riverbank areas lined with riprap following remediation activities on Parcels K10-11-3 and K10-11-5; verify the integrity of these structures.)

- NA - subject to annual inspection in August or September

5. **Paved Area Subject to Inspection** (Inspect the paved area on Parcel K10-11-5 that is identified on Figure 3 of the Final Completion Report, and note evidence of any locations where the pavement is broken up and/or missing and soil is clearly visible.)

- NA

6. **Other Observations** (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)

- A tree guard had been installed on one red maple in Planting Area 8.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Fertilize two stressed black willows in Planting Area 8.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-5

I. GENERAL INFORMATION

Inspection Date: 5/10/2011
Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184
Weather Conditions: Sunny, 55-65° F
Date of Last Inspection: 9/10/2010

II. INSPECTION SUMMARY

1. Confirm that Figures 3 and 4 from the Final Completion Report and the as-built survey drawing included in Appendix C of the Final Completion Report (and any alternative plan proposed by GE) have been reviewed.
- Confirmed
2. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage outlets, drainage swales, or edges of paved areas, etc.)
- NA - subject to annual inspection in August or September
3. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of stressed/sparse cover], other landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and tree stakes; review the restoration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of planted trees and shrubs; and measure and record the size of all trees and shrubs subject to inspection.)
- Monitoring of vegetative cover was previously completed.
- Shrub observations in Planting Areas 1 and 2 are shown in Tables B-4 through B-9 in Attachment B; all shrubs subject to inspection, as well as tree guards, cages, and stakes (where present), are in good condition except as follows:
* One choke cherry in Planting Area 1 was observed to be dead.
* Four silky dogwoods in Planting Area 2 were observed to be stressed.
4. **Areas Potentially Susceptible to Erosion** (Inspect any other areas that are potentially subject to erosion as a result of the remediation, including drainage outlets, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence of any erosion. Include, where relevant, an inspection of the riverbank areas lined with riprap following remediation activities on Parcels K10-11-3 and K10-11-5; verify the integrity of these structures.)
- NA - subject to annual inspection in August or September
5. **Paved Area Subject to Inspection** (Inspect the paved area on Parcel K10-11-5 that is identified on Figure 3 of the Final Completion Report, and note evidence of any locations where the pavement is broken up and/or missing and soil is clearly visible.)
- NA - subject to annual inspection in August or September
6. **Other Observations** (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)
- Two choke cherries, three silky dogwoods and one winterberry had been installed in Planting Area 2.
- Stressed shrubs in Planting Areas 1 and 2 had been fertilized.
- Tree cages/guards removed during the September 2010 inspection had been gathered and properly stored (where applicable).

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Install one choke cherry in Planting Area 1.
- Fertilize four stressed silky dogwoods in Planting Area 2.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-12-1

I. GENERAL INFORMATION

Inspection Date: 5/10/2011
Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184
Weather Conditions: Sunny, 55-65° F
Date of Last Inspection: 9/10/2010

II. INSPECTION SUMMARY

1. Confirm that Figures 3 and 4 from the Final Completion Report and the as-built survey drawing included in Appendix C of the Final Completion Report (and any alternative plan proposed by GE) have been reviewed.

- Confirmed

2. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage outlets, drainage swales, or edges of paved areas, etc.)

- NA - subject to annual inspection in August or September

3. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of stressed/sparse cover], other landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and tree stakes; review the restoration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of planted trees and shrubs; and measure and record the size of all trees and shrubs subject to inspection.)

- Monitoring of vegetative cover was previously completed.

- Tree observations in Planting Areas 12 and 13 are shown in Tables B-10 and B-11 in Attachment B; all trees subject to inspection, as well as tree guards, cages, and stakes (where present), are in good condition.

4. **Areas Potentially Susceptible to Erosion** (Inspect any other areas that are potentially subject to erosion as a result of the remediation, including drainage outlets, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence of any erosion. Include, where relevant, an inspection of the riverbank areas lined with riprap following remediation activities on Parcels K10-11-3 and K10-11-5; verify the integrity of these structures.)

- NA - subject to annual inspection in August or September

5. **Paved Area Subject to Inspection** (Inspect the paved area on Parcel K10-11-5 that is identified on Figure 3 of the Final Completion Report, and note evidence of any locations where the pavement is broken up and/or missing and soil is clearly visible.)

- NA

6. **Other Observations** (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)

- Two eastern cottonwoods had been installed in Planting Area 13.

- Tree cages/guards removed during the September 2010 inspection had been gathered and properly stored (where applicable).

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE



Attachment B

Documentation of Tree/Shrub
Observations

TABLE B-1
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-10-6 (PLANTING AREA 14) -
AMERICAN ELM (ULNUS AMERICANA)

SUMMARY OF MAY 2011 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Tree	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)	Comment
1	NA	Dead	NA	Replanted 6/09
2	NA	Dead	NA	Replanted 8/10

Average Height (ft.):	NA
Height Range (ft.):	NA
Total Tree Count:	2

Note: Property owner removed tree cages from all the trees on this property.

**TABLE B-2
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-2 (PLANTING AREA 8) -
BLACK WILLOW (*SALIX NIGRA*)**

**SUMMARY OF MAY 2011 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Tree	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)	Comment
1	6	Stressed	Good	Replanted 10/09
2	1	Stressed	Good	Replanted 8/10

Average Height (ft.):	3.5
Height Range (ft.):	1-6
Total Tree Count:	2

TABLE B-3
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-2 (PLANTING AREA 8) -
EASTERN COTTONWOOD (*POPULUS DELTOIDES*)

SUMMARY OF MAY 2011 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Tree	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)	Comment
1	4	Good	Good	Replanted 6/09
2	6	Good	Good	Replanted 6/09

Average Height (ft.):	5.0
Height Range (ft.):	4-6
Total Tree Count:	2

TABLE B-4
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-5 (PLANTING AREA 1) -
CHOKE CHERRY (*PRUNUS VIRGINIANA*)

SUMMARY OF MAY 2011 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Shrub	Height (ft.)	Condition of Shrub	Condition of Tree Cage, Guard, and Stakes (where present)	Comment
1	NA	Dead	NA	None

Average Height (ft.):	NA
Height Range (ft.):	NA
Total Shrub Count:	1

TABLE B-5
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-5 (PLANTING AREA 2) -
CHOKE CHERRY (*PRUNUS VIRGINIANA*)

SUMMARY OF MAY 2011 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Shrub	Height (ft.)	Condition of Shrub	Condition of Tree Cage, Guard, and Stakes (where present)	Comment
1	3	Good	Good	Replanted 8/10
2	3	Good	Good	Replanted 8/10
3	3	Good	Good	Replanted 8/10
4	4	Good	Good	Replanted 10/10
5	4	Good	Good	Replanted 10/10

Average Height (ft.):	3.4
Height Range (ft.):	3-4
Total Shrub Count:	5

TABLE B-6
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-5 (PLANTING AREA 2) -
CHOKE BERRY (ARONIA MELANOCARPA)

SUMMARY OF MAY 2011 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Shrub	Height (ft.)	Condition of Shrub	Condition of Tree Cage, Guard, and Stakes (where present)	Comment
1*	5	Good	Good	Replanted 10/09
2*	5	Good	Good	Replanted 10/09

Average Height (ft.):	5.0
Height Range (ft.):	5-5
Total Shrub Count:	2

Shrub	Height (ft.)	Condition of Shrub	Condition of Tree Cage, Guard, and Stakes (where present)	Comment
1**	4	Good	Good	Replanted 8/10
2**	4	Good	Good	Replanted 8/10
3**	4	Good	Good	Replanted 8/10
4**	4	Good	Good	Replanted 8/10
5**	4	Good	Good	Replanted 8/10
6**	4	Good	Good	Replanted 8/10
7**	4	Good	Good	Replanted 8/10
8**	4	Good	Good	Replanted 8/10
9**	4	Good	Good	Replanted 8/10
10**	4	Good	Good	Replanted 8/10
11**	4	Good	Good	Replanted 8/10
12**	4	Good	Good	Replanted 8/10
13**	4	Good	Good	Replanted 8/10

Average Height (ft.):	4.0
Height Range (ft.):	4-4
Total Shrub Count:	13

Notes:

* Two choke berries were planted in October 2009 to replace two dead choke cherries identified during the September 2009 inspection.

** 13 choke berries were planted in August 2010 to replace 13 dead northern arrowwoods identified during the May 2010 inspection.

TABLE B-7
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-5 (PLANTING AREA 2) -
NORTHERN ARROWWOOD (*VIBURNUM DENTATUM*)

SUMMARY OF MAY 2011 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Shrub	Height (ft.)	Condition of Shrub	Condition of Tree Cage, Guard, and Stakes (where present)	Comment
1	3	Good	Good	Replanted 10/09
2	3	Good	Good	Replanted 10/09
3	3	Good	Good	Replanted 10/09

Average Height (ft.):	3.0
Height Range (ft.):	3-3
Total Shrub Count:	3

TABLE B-8
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-5 (PLANTING AREA 2) -
SILKY DOGWOOD (*CORNUS AMOMUM*)

SUMMARY OF MAY 2011 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Shrub	Height (ft.)	Condition of Shrub	Condition of Tree Cage, Guard, and Stakes (where present)	Comment
1	4	Good	Good	Replanted 11/09
2	5	Stressed	Good	Replanted 11/09
3	3	Stressed	Good	Replanted 10/10
4	4	Stressed	Good	Replanted 10/10
5	4	Stressed	Good	Replanted 10/10

Average Height (ft.):	4.0
Height Range (ft.):	3-5
Total Shrub Count:	5

TABLE B-9
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-5 (PLANTING AREA 2) -
WINTERBERRY (*ILEX VERTICILLATA*)

SUMMARY OF MAY 2011 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Shrub	Height (ft.)	Condition of Shrub	Condition of Tree Cage, Guard, and Stakes (where present)	Comment
1	3	Good	Good	Replanted 11/09
2	2	Good	Good	Replanted 11/09
3	2	Good	Good	Replanted 8/10
4	4	Good	Good	Replanted 10/10

Average Height (ft.):	2.8
Height Range (ft.):	2-4
Total Shrub Count:	4

TABLE B-10
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-12-1 (PLANTING AREA 12) -
EASTERN COTTONWOOD (*POPULUS DELTOIDES*)

SUMMARY OF MAY 2011 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Tree	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)	Comment
1	8	Good	Good	Replanted 10/09

Average Height (ft.):	8.0
Height Range (ft.):	8
Total Tree Count:	1

TABLE B-11
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-12-1 (PLANTING AREA 13) -
EASTERN COTTONWOOD (*POPULUS DELTOIDES*)

SUMMARY OF MAY 2011 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Tree	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)	Comment
1	6	Good	Good	Replanted 11/10
2	5	Good	Good	Replanted 11/10

Average Height (ft.):	5.5
Height Range (ft.):	5-6
Total Tree Count:	2