



GE
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Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

September 23, 2010

Ms. Karen Pelto
Case Manager
Bureau of Waste Site Cleanup
Massachusetts Department of Environmental Protection
One Winter Street, 8th Floor
Boston, Massachusetts 02108

**Re: GE-Pittsfield/Housatonic River Site
Lyman Street Area (GEC430)
Summary of August 2010 Inspection of Natural Resource Restoration/Enhancement
Measures**

Dear Ms. Pelto:

On August 25, 2010, the General Electric Company (GE) performed the fifth inspection of the natural resource restoration/enhancement (NRR/E) measures installed at the Lyman Street Area. As shown on Figure 1, the areas subject to NRR/E measures are: (1) the southern portion of Parcel I9-8-1 (the former GE Lyman Street parking lot area) which has been covered by a vegetative engineered barrier (i.e., the parking lot area excluding the paved access road); and (2) the unpaved area in the northern portion of Parcel I9-8-1. The NRR/E measures installed in these areas consist of the planting of an herbaceous native grassland community, as well as the placement of a bluebird box on the southern edge of the parking lot area adjacent to the Housatonic River. This letter provides some background information on these measures and presents the results of the August 25, 2010 inspection.

Background

The NRR/E measures required to be installed at the Lyman Street Area were specified in the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site and associated *Statement of Work for Removal Actions Outside the River* (SOW), as supplemented by a number of subsequent submissions. These included GE's September 2005 *Final Removal Design/Removal Action Work Plan for Lyman Street Area* (Final Work Plan), an Addendum to that Final Work Plan dated April 4, 2006, and a March 2007 submittal titled *Properties East of Lyman Street – Supplemental Information Package* – all of which were conditionally approved by the U.S. Environmental Protection Agency (EPA). These measures consisted of the following:

- The planting of an herbaceous native grassland community on the surface of the vegetative engineered barrier at the Lyman Street parking lot area (excluding the paved access road), as well as in the unpaved area of the northern portion of Parcel I9-8-1 (as shown on Figure 1), using a mixture of native grass and wildflower species proposed in the Final Work Plan and approved by EPA; and
- The installation of a bluebird box along the edge of the Lyman Street parking lot area adjacent to the Housatonic River.

GE performed the EPA-approved remediation actions at the portion of the Lyman Street Area east of Lyman Street between May and November 2007. These actions also included the planting of an herbaceous native grassland community in the NRR/E areas. Subsequently, in June 2008, two bluebird boxes were installed along the edge of the Lyman Street parking lot area adjacent to the river; however, one of those boxes was removed in fall 2008 to meet the requirement of Attachment I to the SOW that a minimum distance of 300 yards must be maintained between bluebird boxes. In accordance with a request from the Trustees in a letter dated March 7, 2006, GE did not place stumps and rock piles within the NRR/E area.

The requirements for monitoring and maintenance of the NRR/E measures, in accordance with Attachment I to the SOW, were set out in the *Post-Removal Site Control/Restoration Project Monitoring and Maintenance Plan* included in the April 2006 Addendum and subsequently specified in the Post-Removal Site Control Plan included in the *Final Completion Report for the Lyman Street Area Removal Action* (Final Completion Report).

Based on observations made during an inspection of the NRR/E areas in May 2008, herbaceous planting areas within the NRR/E area were determined to be exhibiting less than the required 100% cover. In response to these observations, GE conducted replanting activities with a Trustee-proposed seed mix in June 2008.

During the following inspection in July 2008, the Trustees determined that the installation of the restoration work had been completed in accordance with the applicable CD requirements and Performance Standards. The Trustees issued a Certification of Completion of Installation of Restoration Work to GE on September 2, 2008.

Given the re-seeding of this area in 2008, it was agreed that, following an initial inspection in 2008, the monitoring schedule would include two visits in 2009, 2010, and 2011, one in 2013, and one in 2015. GE conducted monitoring visits in June and July 2009, and June 2010 and submitted reports on those inspections to the Trustees on July 1 and August 20, 2009, and July 8, 2010, respectively. The remainder of this letter describes the results of the August 2010 inspection.

Summary of Inspection Activities

The August 2010 inspection was conducted in accordance with Attachment I to the SOW and the Post-Removal Site Control requirements specified in the Final Completion Report, which was submitted to EPA on August 27, 2009 and approved by EPA on September 14, 2009. Inspection activities consisted of a field inspection and survey of the planting areas to: (a) verify areal coverage by herbaceous species; (b) determine any instances of trespassing or herbivory; (c) assess the apparent vigor of the vegetation; (d) inspect for the presence of invasive species; and (e) assess the condition of the bluebird box. Representatives of EPA and the Trustees were present at this inspection.

To document the results of the August 2010 inspection, GE completed an NRR/E Inspection Checklist and collected photographic documentation of the conditions of the NRR/E areas. Copies of the completed checklist and the photographs are provided as attachments.

Summary of Observations During Inspection

Under Attachment I to the SOW, the percent coverage Performance Standard for the NRR/E area is 100%. The Post-Removal Site Control requirements specify that any herbaceous planting area within the NRR/E area with less than 100% cover will be evaluated with Trustee input, and that supplemental

activities such as additional fertilizing, watering, and/or measures to reduce herbivory will be implemented as needed. As noted in the attached Inspection Checklist, the August 2010 inspection indicated that the NRR/E areas exhibited approximately 100% herbaceous groundcover. This was true both for the former GE parking lot area and for the unpaved area in the northern portion of Parcel I9-8-1.

Further, during that inspection, no significant signs of herbivory or stress were observed in the developing plant communities. It was observed that the invasive species, Japanese knotweed, which had been established prior to the initiation of remediation activities at the Lyman Street Area and had been observed within the NRR/E areas during the July 2008 inspection, continues to be present in the northeastern portion of the NRR/E areas. Japanese knotweed was also observed at neighboring Parcels I9-8-8 and I9-8-9. The total percentage of area occupied by this species within the NRR/E areas was less than 1%, which is well below the 5% Performance Standard for invasive species cover set forth in Attachment I to the SOW. Nevertheless, GE intends to continue the treatment program that had been initiated in fall 2008 and continued in 2009 and spring/summer 2010 in an effort to eradicate the Japanese knotweed in the NRR/E areas. Specifically, GE will continue that treatment program in fall 2010 and spring 2011. GE also intends to implement the same treatment program at Parcels I9-8-8 and I9-8-9 to assist in the eradication of the species within the NRR/E areas.

In addition to Japanese knotweed, it was also observed that the invasive species, coltsfoot, was present in the northeastern portion of the NRR/E areas. The total percentage of area occupied by this species was less than 1%. Although not required, as discussed during the inspection, observed specimens will be treated in conjunction with the Japanese knotweed treatment program as a preventative measure.

In addition, the NRR/E areas are surrounded by a locked chain-link fence restricting trespasser access, and no signs of damage from trespassers were observed. Finally, the bluebird box was found to be present, intact, and in good condition.

Schedule of Future Activities and Inspections

As noted above, GE began a program of invasive species treatment for the Japanese knotweed in fall 2008, continued the program in 2009 and spring/summer 2010, and intends to continue the treatment program in fall 2010 and spring 2011. The treatment program in fall 2010 and spring 2011 will extend to neighboring Parcels I9-8-8 and I9-8-9 and will include treatment of the observed coltsfoot specimens.

In accordance with the Post-Removal Site Control Plan in the approved Final Completion Report, two site visits will be performed during each of the first three years after the 2008 replanting (one in May or June and one in July or August), one visit during the fifth year after that replanting (in July/August), and one visit during the seventh year after that replanting (in July/August). The June 2 and July 28, 2009 inspections constituted the required inspections for the first year following the replanting of the NRR/E areas in June 2008, and the June 8 and August 25, 2010 inspections constituted the two required inspections for the second year. GE will conduct two monitoring visits in 2011, one visit in 2013, and one visit in 2015. In addition, the bluebird box is required to be inspected once per year for three years after installation. That box was inspected in July 2009 and August 2010 and will be inspected again in July or August 2011.

These inspections, as well as any necessary maintenance, will be performed in accordance with the NRR/E inspection/maintenance requirements set out in Attachment I to the SOW, as noted in the Final Completion Report, and will utilize the NRR/E Inspection Checklist included in Appendix O of that report. Following each inspection, an inspection report will be prepared and submitted to the Trustees' representative in the Massachusetts Department of Environmental Protection, with copies to EPA, within

90 days of each inspection. In addition, GE will prevent shrub and tree growth within the NRR/E areas at the Lyman Street Area through mowing of the grass in those areas once every year in September or October, as well as through removal of shrub/tree growth, where necessary, in the engineered barrier portion of the NRR/E area.

Please call me if you have any comments or questions.

Sincerely,

Richard W. Gates / EGB

Richard W. Gates
Remediation Project Manager

Attachments

cc: Dean Tagliaferro, EPA
Richard Fisher, EPA
Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston (2 copies)
Michael Gorski, MDEP*
Eva Tor, MDEP*
John Ziegler, MDEP (2 copies)

Todd Chadwell, Stantec
Mayor James Ruberto, City of Pittsfield
Nancy E. Harper, MA AG*
Michael Carroll, GE*
Rod McLaren, GE
James Nuss, ARCADIS
James Bieke, Goodwin Procter
Public Information Repositories
GE Internal Repositories

* *without attachments*

**NATURAL RESOURCE RESTORATION / ENHANCEMENT
INSPECTION CHECKLIST**

LYMAN STREET AREA REMOVAL ACTION

PARCEL I9-8-1 (UNPAVED NORTHERN PORTION AND VEGETATIVE ENGINEERED BARRIER OVER SOUTHERN PORTION)

I. GENERAL INFORMATION

Inspection Date: 08/25/10
Conducted By: Paolo Filippetti - (585) 385-0090 est. 35
Weather Conditions: Partly Cloudy, 68°F
Date of Last Inspection: 06/08/10

II. INSPECTION SUMMARY

1. Groundcover

A. Estimated Groundcover (Note percentage of groundcover by herbaceous species; note evidence of areas of bare/sparse vegetation; note any damage from trespassing or herbivory; note any physical changes since last inspection, etc.)

- Lyman Street parking lot area - approximately 100% total ground cover.
- Unpaved northern portion of parcel - approximately 100% ground cover.

B. Presence of Invasive Species (Note percentage of area occupied by invasive species; note the species present including the following: Amur honeysuckle, Autumn olive, Black locust, Black swallow-wort, Coltsfoot, Common barberry, Common buckthorn, Cyprus spurge, Garlic mustard, Glossy buckthorn, Goutweed or Bishop's weed, Japanese barberry, Japanese honeysuckle, Japanese knotweed, Morrow's honeysuckle, Morrow's X Tartarian honeysuckle [hybrid], Multiflora rose, Norway maple, Oriental bittersweet, Phragmites - Reed grass, Porcelain berry, Purple loosestrife, Russian olive, Spotted knapweed, Tartarian honeysuckle, Yellow iris, or any other plant species listed by the Massachusetts Invasive Plant Advisory Group as "Invasive," "Likely Invasive," or "Potentially Invasive.")

- Japanese knotweed (*Polygonum cuspidatum*) observed in the northeastern portion of the Lyman Street parking lot area. Total percentage of area occupied by this species is less than 1%.
- Coltsfoot (*Tussilago farfara*) observed in the northeastern portion of the Lyman Street parking lot area. Total percentage of area occupied by this species is less than 1%. Although not required, as discussed during the inspection, observed specimens will be treated in conjunction with the Japanese knotweed treatment program as a preventative measure.
- Japanese knotweed was observed on neighboring parcels (Parcels I9-8-8 and I9-8-9), which are not subject to NRR/E activities.

2. Bluebird box to be inspected on a yearly basis for 3 years. (Note any evidence of damage and the extent of damage such as the need to be replaced.)

- Bluebird box observed to be 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.)

- Japanese knotweed treatment program continued in summer/fall 2009 and spring/summer 2010.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Continue Japanese knotweed treatment program in fall 2010 and spring 2011, including neighboring Parcels I9-8-8 and I9-8-9.
- Treat observed coltsfoot specimens in conjunction with the Japanese knotweed treatment program in fall 2010 and spring 2011.
- Mow NRR/E area in September/October 2010.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE



Photo #1: Herbaceous cover within the NRR/E area at the Lyman Street Area (looking north).



Photo #2: Herbaceous cover within the NRR/E area at the Lyman Street Area (looking north).

Client: General Electric Company

Project Name: Lyman Street Area

Project Location: Pittsfield, Massachusetts

ARCADIS



Photo #3: Herbaceous cover within the NRR/E area at the Lyman Street Area (looking east).



Photo #4: Japanese knotweed observed within the NRR/E area at the Lyman Street Area.

Client: General Electric Company

Project Name: Lyman Street Area

Project Location: Pittsfield, Massachusetts

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Photo #5: Japanese knotweed observed within the NRR/E area at the Lyman Street Area.

Client: General Electric Company

Project Name: Lyman Street Area

Project Location: Pittsfield, Massachusetts

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