



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

September 16, 2008

Mr. Richard Hull
United States Environmental Protection Agency
1 Congress Street, Suite 1100 (HBO)
Boston, MA 02114-2023

**Re: GE-Pittsfield/Housatonic River Site
Former Oxbow Areas J and K (GECD420)
Summary of August 2008 Inspection Activities**

Dear Mr. Hull:

On August 18, 2008, 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, Former Oxbow Areas J and K 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.

GE previously conducted post-remediation inspections of these properties in November 2006, May 2007, October 2007, and May 2008. The November 2006, May 2007, and October 2007 inspections were conducted in accordance with the Post-Removal Site Control Plan contained in Attachment E to GE's Final Removal Design/Removal Action (RD/RA) Work Plan for Former Oxbow Areas J and K, as revised and set forth in Attachment G to GE's April 2006 Addendum to the Final RD/RA Work Plan. The May 2008 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, and was limited to the vegetation that was planted in remediated/restored areas. Summaries of those inspection activities were submitted to EPA in letters dated January 3, 2007, July 11, 2007, November 7, 2007, and June 18, 2008, respectively.

Summary of Inspection Activities

The August 2008 inspection was conducted in accordance with the Post-Removal Site Control requirements specified in the Final Completion Report and included both general inspections of the backfilled/restored areas and inspections of the vegetation that was planted in remediated/restored areas, as described below.

This inspection included visual observations of the backfilled/restored areas, focusing on the following: (a) any areas where excessive settlement had occurred relative to the surrounding areas; (b) any drainage or growth problems; and (c) other conditions that could jeopardize the performance of the completed remediation. The inspection also included an evaluation of areas susceptible to erosion as a result of the remediation, including the riverbank areas lined with riprap following remediation activities and other areas susceptible to erosion as shown on Figure 3 of the Final Completion Report. In addition, the area on Parcel K10-11-5 that was evaluated as paved and that contains PCB concentrations in the top foot of soil under the pavement that would exceed the not-to-exceed (NTE) level for that particular type of property, as also shown on Figure 3 of the Final Completion Report, was inspected to ensure that the pavement was not broken up and/or missing and that soil was not visible.

Additionally, the August 2008 inspection evaluated the vegetation that had been planted or seeded. These inspection activities included visual observations of the grass/herbaceous covers to assess the condition of that vegetation, including any evidence of stressed or sparse cover, and to ensure that the vegetation is growing as anticipated and providing the desired degree of erosion control. The inspection also included observations of the trees and/or shrubs planted on four properties as part of restoration activities to ensure that they are in good general health. Figure 2 contains the restoration planting plan as presented on Figure 4 from the Final Completion Report. Figure 2 also provides information regarding the trees and shrubs that were replanted since the May 2008 inspection, including the species, installation date, and size at the time of replanting. Observations at these properties included a stem count of planted trees/shrubs (quantity per species per parcel) in good health and a stem count of trees/shrubs that were dead or dying or showing evidence of stress, if any, within each property. The results of the observations were used to evaluate if trees/shrubs are surviving at a frequency of 100% of the original planted quantity (as specified on Figure 2). Additionally, each tree/shrub observed was measured to determine the average height and range of heights of each species of tree/shrub within each property. In conjunction with the tree and shrub observations, GE inspected tree cages, tree guards, and tree stakes (where present) to ensure that these items were functioning to protect the trees/shrubs from damage.

The August 2008 inspection also included observations of properties/areas at which the need for follow-up maintenance activities had been identified during the May 2008 inspection. Those activities included installing one eastern cottonwood and one red maple on Parcel K10-11-2 and two northern arrowwoods, three silky dogwoods, and one winterberry on Parcel K10-11-5 (all completed in July 2008); monitoring one stressed red maple on Parcel K10-11-2 and one northern arrowwood on Parcel K10-11-5; and replacing the tree guard around the white ash tree on Parcel K10-12-1 (completed in May 2008). As noted above, Figure 2 includes information about the replanted trees and shrubs.

The results of the August 2008 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. Documentation of the tree/shrub observations is provided in Tables B-1 through B-12 in Attachment B. These tables list, for each species at each parcel at which trees or shrubs were planted, the number of trees/shrubs observed, 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 August 2008 inspection indicated that the backfilled/restored areas were in good overall condition, that the areas susceptible to erosion were in good condition, that the paved area subject to annual inspections on Parcel K10-11-5 was in good condition, and that the herbaceous vegetation was growing as anticipated. The inspection also showed that most of the planted trees and shrubs were in good condition. However, a relatively small number of the planted trees/shrubs were identified as dead or stressed (or were not located). The results of the planted tree/shrub observations and measuring activities are summarized in the following table:

Tree/Shrub Count Results								
Parcel	Species	Planted ¹	Observed in Good Health	Observed Dead/Stressed ²	Avg Height (ft.)	Range of Heights (ft.)	Percent in Good Health (%) ³	Percent Survival (%) ⁴
K10-10-6	American Elm	9	7	2/1	5	4-6	78	89
	Eastern Hemlock	4	4	0	6.3	5-7	100	100
K10-11-2	Black Willow	10	9	1/0	6.1	5-7	90	90
	Eastern Cottonwood	9	9	1/0	9.7	3-12	100	100
	Red Maple	2	2	0	4	4	100	100
K10-11-5	Choke Cherry	20	22	0	2.7	1-5	>100	>100
	Northern Arrowwood	20	15	0/5	3.6	2-5	75	100
	Silky Dogwood	20	21	0	3.2	2-4	>100	>100
	Winterberry	20	17 (3 not located)	0	2.8	1-4	85	85
K10-12-1	American Elm	2	2	0	5	4-6	100	100
	Eastern Cottonwood	14	12	1/2	8.9	4-13	86	100
	White Ash	1	1	0	4	--	100	100

Notes:

1. The quantity of each species planted corresponds to the quantity identified on Figure 4 from the Final Completion Report.
2. This column lists the number of dead trees/shrubs observed and then the number of trees/shrubs that were not dead but were stressed.
3. This column shows the percentage of trees/shrubs that were in good condition relative to the original planted quantity.
4. This column shows the percentage of trees/shrubs that were alive (including stressed plants) relative to the original planted quantity.

Note that, in the above table, the quantities observed of certain species at certain properties (namely, American elms at Parcel K10-10-6, eastern cottonwoods at Parcel K10-11-2, choke cherries at Parcel K10-11-5, silky dogwoods at Parcel K10-11-5, and eastern cottonwoods at Parcel K10-12-1) are higher than the original planted quantities. In accordance with discussions with EPA, certain trees/shrubs that were either (i) planted and did not meet the required specification or (ii) showing signs of stress were left in place, and replacement trees were installed. Therefore, in these cases, more trees/shrubs are present than the number originally planted.

In summary, the results of the tree/shrub counting activities indicated that nine of the 12 species planted at Parcels K10-10-6, K10-11-2, K10-11-5, and K10-12-1 have a survival frequency of 100% (or greater) of the original planted quantity. The species with a percent survival of less than 100% consisted of American elm on Parcel K10-10-6, black willow on Parcel K10-11-2, and winterberries on Parcel K10-11-5. For these species, as described below, GE will perform replanting activities to achieve a 100% survival rate. Additionally, one winterberry on Parcel K10-11-5 was observed to have exposed roots and needs the addition of soil to cover the roots.

In addition, as shown on the attached forms, the inspection indicated that some of the tree guards, cages, and stakes (where present) for live trees/shrubs were in good condition, with the following exceptions:

- All planted American elm trees on Parcel K10-10-6 were observed to show signs of deer rutting damage; therefore, tree guards will need to be installed.
- One tree guard on a red maple on Parcel K10-11-2 needed a top band.
- One northern arrowwood, two winterberries, one choke cherry, and three silky dogwoods on Parcel K10-11-5 showed evidence of beaver damage and need tree guards.
- One American elm on Parcel K10-12-1 needed a tree guard.

The top band of the tree guard on the red maple on Parcel K10-11-2 and the tree guard on one American elm on Parcel K10-12-1 were installed in August 2008.

Maintenance/Replanting Activities

Based on the August 2008 inspection, GE will undertake the following activities:

- Install one American elm on Parcel K10-10-6, one black willow on Parcel K10-11-2, and three winterberries on Parcel K10-11-5;
- Add soil to the base of one winterberry on Parcel K10-11-5;
- Install tree guards on the planted American elm trees on Parcel K10-10-6 and the seven shrubs on Parcel K10-11-5; and
- Monitor one stressed American elm on Parcel K10-10-6, five stressed northern arrowwoods on Parcel K10-11-5, and two stressed eastern cottonwoods on Parcel K10-12-1.

The addition of soil to the winterberry on Parcel K10-11-5, installation of tree guards at Parcels K10-10-6 and K10-11-5, and tree/shrub replanting activities will be conducted this fall. The replanted trees/shrubs will be installed in accordance with the previously approved planting plan. GE will equip replanted trees and shrubs with a tag identifying the species of tree or shrub, the installation date, and the general size at the time of installation. After these trees/shrubs are replanted, GE will further revise Figure 2 (herein) to include the species, installation date, and size at the time of replanting of the replanted trees/shrubs. The revised Figure 2 will serve as the basis for the next inspection and will be submitted to EPA.

Schedule for Future Inspections

In accordance with the Post-Removal Site Control Plan included in the Final Completion Report, future inspections of the backfilled/restored areas will be performed annually (subject to EPA approval of a different frequency), with the next inspection scheduled for August or September 2009. All the revegetated areas will be inspected in May and August or September 2009 to assess the condition of the vegetation. The trees and shrubs replanted in July 2008 will also be inspected in May 2010 to complete the required inspection schedule of twice per year for two years. In addition, the new trees and shrubs that will be installed as described above will be inspected twice per year for a total of two years after planting – i.e., through August/September 2010.

These 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

Richard W. Gates /EGB

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)
K.C. Mitkevicius, USACE
Michael Gorski, MDEP (2 copies)
Susan Steenstrup, MDEP
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Nancy E. Harper, MA AG*
Dale Young, MA EOEEA*
Mayor James Ruberto, City of Pittsfield

Michael Carroll, GE*
Rod McLaren, GE*
Peter Wojcik, GE*
James Nuss, ARCADIS
James Bieke, Goodwin Procter
Property Owner – Parcels K10-11-1 & K10-12-1
Property Owner – Parcel K10-11-2
Property Owner – Parcel K10-11-3
Property Owner – Parcel K10-11-5
Property Owner – Parcel K10-11-6
Property Owner – Parcel K10-13-1
Public Information Repositories
GE Internal Repository

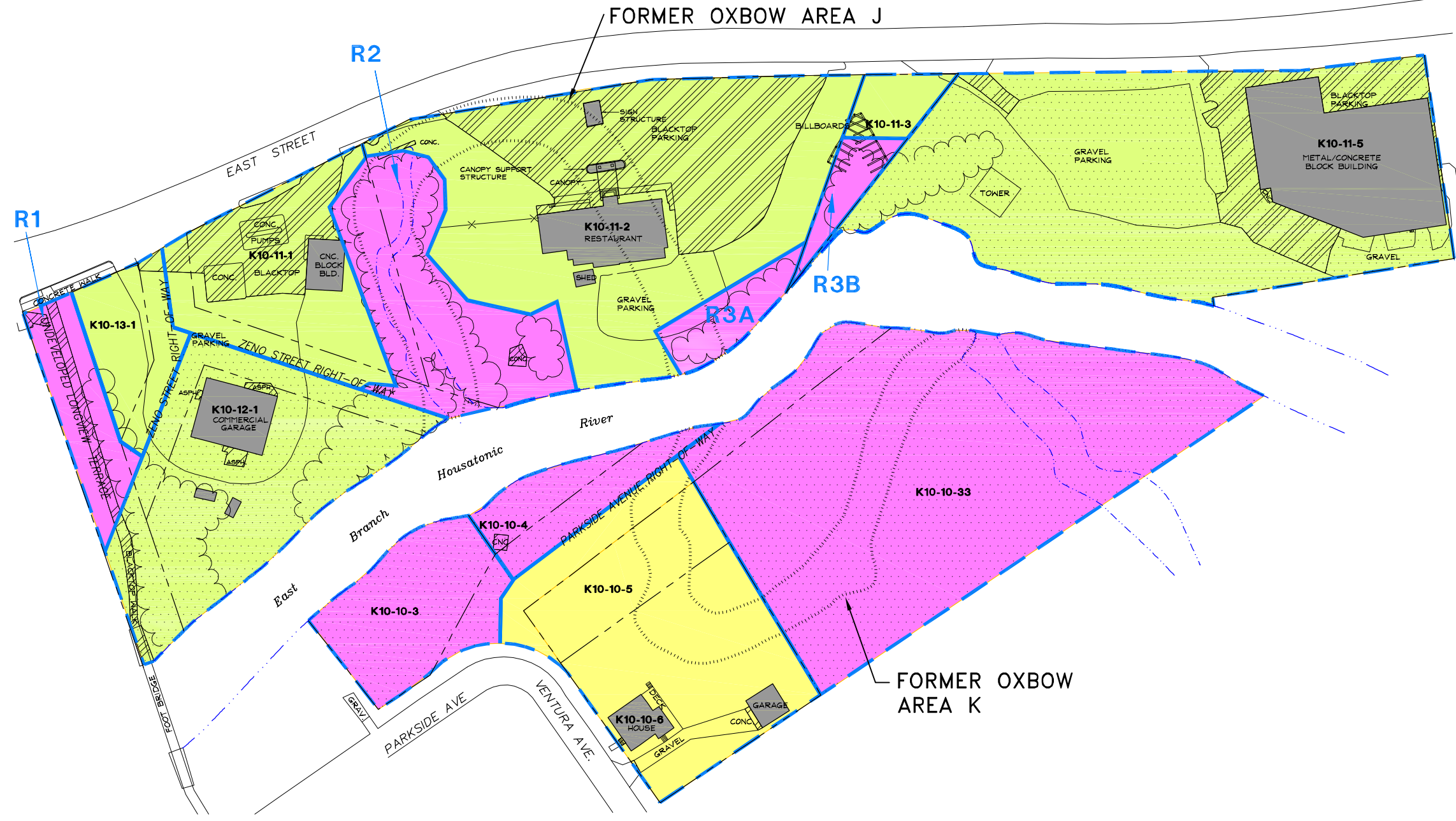
** cover letter only*

ARCADIS

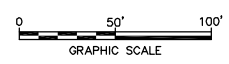
Figures

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XREFS: IMAGES: PROJECTNAME: 30910X01 30910X01



- 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
AUGUST 2008 INSPECTION

SITE PLAN

FIGURE
1

ARCADIS

Attachment A

Completed Inspection Forms

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-10-6

I. GENERAL INFORMATION

Inspection Date: 8/18/2008
Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184
Weather Conditions: Mostly sunny - 85°F
Date of Last Inspection: 5/21/2008

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.)
- All areas in good condition.

- 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.)
- Vegetative cover in good condition.
- Tree observations shown in Tables B-1 and B-2 in Attachment B:
* 7 elms in good condition; one stressed and two dead elms observed; total quantity observed (10) is greater than original planted quantity (9) due to replanting activities.
* Tree cages need to be installed on all live elms due to signs of deer rutting.
* All eastern hemlocks 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.)
- All areas in good condition.

- 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.)
- N/A

- 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

- Replace 1 dead elm.
- Install tree cages on all elms.
- Monitor stressed elm.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-1

I. GENERAL INFORMATION

Inspection Date: 8/18/2008
Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184
Weather Conditions: Mostly sunny - 85°F
Date of Last Inspection: 5/21/2008

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.)

- All areas in good condition.

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.)

- Vegetative cover in good condition. (No trees/shrubs planted.)

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.)

- All areas in good condition.

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.)

- N/A

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

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-2

I. GENERAL INFORMATION

Inspection Date: 8/18/2008
Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184
Weather Conditions: Mostly sunny - 85°F
Date of Last Inspection: 5/21/2008

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.)

- All areas in good condition.

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.)

- Vegetative cover in good condition.

- Tree observations shown in Tables B-3, B-4, and B-5 in Attachment B:

* 9 black willows in good condition; one dead willow observed.

* 9 eastern cottonwoods in good condition; one dead cottonwood observed but does not affect percent survival compared to original planted quantity, because total quantity observed (10) is greater than original planted quantity (9) due to replanting activities.

* All red maples in good condition.

* Top band of tree guard on one red maple needs to be installed.

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.)

- All areas in good condition.

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.)

- N/A

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.)

- Dead eastern cottonwood and red maple replaced in July 2008.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Replace 1 dead black willow.

- Install top band of tree guard on one red maple (completed August 2008).

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-3

I. GENERAL INFORMATION

Inspection Date: 8/18/2008
Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184
Weather Conditions: Mostly sunny - 85°F
Date of Last Inspection: 5/21/2008

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.)

- All areas in good condition.

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.)

- Vegetative cover in good condition. (No trees/shrubs planted.)

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.)

- All areas in good condition.

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.)

- N/A

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

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-5

I. GENERAL INFORMATION

Inspection Date: 8/18/2008
Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184
Weather Conditions: Mostly sunny - 85°F
Date of Last Inspection: 5/21/2008

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.)

- All areas in good condition.

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.)

- Vegetative cover in good condition.

- Tree/shrub observations shown in Tables B-6 through B-9 in Attachment B:

* 22 choke cherries in good condition.

* 15 northern arrowwoods in good condition; five stressed northern arrowwoods observed.

* 21 silky dogwoods in good condition.

* 17 winterberry in good condition; three of the originally planted winterberries were not found during the August 2008 inspection.

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.)

- All areas in good condition.

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.)

- Paved area is in good condition.

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.)

- 2 dead northern arrowwoods, 3 dead silky dogwoods, and 1 dead winterberry replaced in July 2008.

- Signs of beaver damage to seven shrubs. Need to install tree guards.

- Roots and base of a winterberry are exposed. Need to install soil to the base of the shrub.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Replace 3 missing winterberries.

- Install tree guards to shrubs observed with beaver damage.

- Add soil to the base of one winterberry.

- Monitor 5 stressed northern arrowwoods.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-12-1

I. GENERAL INFORMATION

Inspection Date: 8/18/2008
Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184
Weather Conditions: Mostly sunny- 85°F
Date of Last Inspection: 5/21/2008

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.)
- All areas in good condition.

- 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.)
- Vegetative cover in good condition.
- Tree observations shown in Tables B-10, B-11, and B-12 in Attachment B:
* Both elms in good condition, but one needs a tree guard.
* 12 eastern cottonwoods in good condition; 1 dead and 2 stressed eastern cottonwoods observed; dead cottonwood does not affect percent survival compared to original planted quantity because total quantity observed (15) is greater than original planted quantity (14) due to replanting activities.
* The one white ash is 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.)
- All areas in good condition.

- 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.)
- N/A

- 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.)
- Tree guard around white ash tree was replaced.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Monitor 2 stressed eastern cottonwoods.
- Install tree guard on 1 elm (completed August 2008).

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-13-1

I. GENERAL INFORMATION

Inspection Date: 8/18/2008
Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184
Weather Conditions: Mostly sunny - 85°F
Date of Last Inspection: 5/21/2008

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.)

- All areas in good condition.

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.)

- Vegetative cover in good condition. (No trees/shrubs planted.)

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.)

- All areas in good condition.

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.)

- N/A

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

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

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Attachment B

Documentation of Tree/Shrub
Observations

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

**SUMMARY OF AUGUST 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Tree/Shrub	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)
1	5	Good	Needs a Tree Cage
2	6	Good	Needs a Tree Cage
3	5	Good	Needs a Tree Cage
4	4	Good	Needs a Tree Cage
5	4	Stessed	Needs a Tree Cage
6	4	Good	Needs a Tree Cage
7	6	Good	Needs a Tree Cage
8	6	Good	Needs a Tree Cage
9	NA	Dead	NA
10	NA	Dead	NA

Average Height (ft.):	5.0
Height Range (ft.):	4-6
Total Tree Count:	8

**TABLE B-2
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-10-6 - EASTERN HEMLOCK (TSUGA CANADENSIS)**

**SUMMARY OF AUGUST 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Tree/Shrub	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)
1	7	Good	No Tree Guard Needed
2	7	Good	No Tree Guard Needed
3	6	Good	No Tree Guard Needed
4	5	Good	No Tree Guard Needed

Average Height (ft.):	6.3
Height Range (ft.):	5-7
Total Tree Count:	4

**TABLE B-3
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-2 - BLACK WILLOW (*SALIX NIGRA*)**

**SUMMARY OF AUGUST 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Tree/Shrub	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)
1	NA	Dead	NA
2	6	Good	Good
3	6	Good	Good
4	5	Good	Good
5	7	Good	Good
6	7	Good	Good
7	5	Good	Good
8	7	Good	Good
9	5	Good	Good
10	7	Good	Good

Average Height (ft.):	6.1
Height Range (ft.):	5-7
Total Tree Count:	9

**TABLE B-4
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-2 - EASTERN COTTONWOOD (*POPULUS DELTOIDES*)**

**SUMMARY OF AUGUST 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

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

Average Height (ft.):	9.7
Height Range (ft.):	3-12
Total Tree Count:	9

TABLE B-5
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-2 - RED MAPLE (*ACER RUBRUM*)

SUMMARY OF AUGUST 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Tree/Shrub	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)
1	4	Good	Needs Top Band
2	4	Good	Good

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

**TABLE B-6
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-5 - CHOKE CHERRY (ARONIA MELANOCARPA)**

**SUMMARY OF AUGUST 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Tree/Shrub	Height (ft.)	Condition of Shrub	Condition of Tree Cage, Guard, and Stakes (where present)
1	1	Good	Good
2	3	Good	No Tree Guard Needed
3	5	Good	No Tree Guard Needed
4	4	Good	No Tree Guard Needed
5	1	Good	Good
6	1	Good	Good
7	4	Good	No Tree Guard Needed
8	5	Good	No Tree Guard Needed
9	2	Good	No Tree Guard Needed
10	2	Good	No Tree Guard Needed
11	2	Good	No Tree Guard Needed
12	2	Good	No Tree Guard Needed
13	3	Good	No Tree Guard Needed
14	2	Good	Good
15	2	Good	No Tree Guard Needed
16	5	Good	No Tree Guard Needed
17	3	Good	No Tree Guard Needed
18	2	Good	No Tree Guard Needed
19	4	Good	No Tree Guard Needed
20	2	Good	No Tree Guard Needed
21	2	Good	No Tree Guard Needed
22	2	Good	Needs a Tree Guard

Average Height (ft.):	2.7
Height Range (ft.):	1-5
Total Shrub Count:	22

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

**SUMMARY OF AUGUST 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Tree/Shrub	Height (ft.)	Condition of Shrub	Condition of Tree Cage, Guard, and Stakes (where present)
1	4	Good	Good
2	4	Stressed	No Tree Guard Needed
3	4	Good	Good
4	4	Good	Good
5	2	Stressed	No Tree Guard Needed
6	3	Stressed	No Tree Guard Needed
7	4	Stressed	Good
8	4	Good	No Tree Guard Needed
9	4	Good	Good
10	4	Good	No Tree Guard Needed
11	4	Good	No Tree Guard Needed
12	4	Good	Good
13	3	Good	Good
14	3	Good	No Tree Guard Needed
15	2	Good	No Tree Guard Needed
16	3	Good	No Tree Guard Needed
17	3	Good	No Tree Guard Needed
18	3	Stressed	No Tree Guard Needed
19	4	Good	No Tree Guard Needed
20	5	Good	Needs a Tree Guard

Average Height (ft.):	3.6
Height Range (ft.):	2-5
Total Shrub Count:	20

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

**SUMMARY OF AUGUST 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Tree/Shrub	Height (ft.)	Condition of Shrub	Condition of Tree Cage, Guard, and Stakes (where present)
1	2	Good	No Tree Guard Needed
2	4	Good	No Tree Guard Needed
3	4	Good	Good
4	2	Good	Good
5	4	Good	No Tree Guard Needed
6	4	Good	Good
7	4	Good	No Tree Guard Needed
8	3	Good	Good
9	2	Good	No Tree Guard Needed
10	4	Good	No Tree Guard Needed
11	2	Good	Good
12	4	Good	Good
13	3	Good	No Tree Guard Needed
14	3	Good	No Tree Guard Needed
15	4	Good	No Tree Guard Needed
16	3	Good	No Tree Guard Needed
17	4	Good	No Tree Guard Needed
18	4	Good	No Tree Guard Needed
19	2	Good	Needs a Tree Guard
20	2	Good	Needs a Tree Guard
21	3	Good	Needs a Tree Guard

Average Height (ft.):	3.2
Height Range (ft.):	2-4
Total Shrub Count:	21

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

**SUMMARY OF AUGUST 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

Tree/Shrub	Height (ft.)	Condition of Shrub	Condition of Tree Cage, Guard, and Stakes (where present)
1	2	Good	Good
2	4	Good	No Tree Guard Needed
3	3	Good	Good
4	2	Good	Good
5	3	Good	No Tree Guard Needed
6	4	Good	No Tree Guard Needed
7	2	Good	No Tree Guard Needed
8	3	Good	Good
9	3	Good	Good
10	3	Good	No Tree Guard Needed
11	2	Good	No Tree Guard Needed
12	3	Good	No Tree Guard Needed
13	3	Good	No Tree Guard Needed
14	4	Good	No Tree Guard Needed
15	3	Good	No Tree Guard Needed
16	1	Good	Needs a Tree Guard
17	2	Good	Needs a Tree Guard

Average Height (ft.):	2.8
Height Range (ft.):	1-4
Total Shrub Count:	17

TABLE B-10
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-12-1 - AMERICAN ELM (*ULNUS AMERICANA*)

SUMMARY OF AUGUST 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Tree/Shrub	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)
1	4	Good	Good
2	6	Good	Needs a Tree Guard

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

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

SUMMARY OF AUGUST 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Tree/Shrub	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)
1	11	Good	Good
2	13	Good	Good
3	10	Good	Good
4	7	Good	Good
5	8	Good	Good
6	13	Good	Good
7	8	Good	Good
8	6	Stressed	Good
9	4	Good	Good
10	8	Good	Good
11	12	Good	Good
12	10	Good	Good
13	NA	Dead	NA
14	10	Good	Good
15	5	Stressed	Good

Average Height (ft.):	8.9
Height Range (ft.):	4-13
Total Tree Count:	14

TABLE B-12
SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-12-1 - WHITE ASH (*FRAXINUS AMERICANA*)

SUMMARY OF AUGUST 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS J AND K
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS

Tree/Shrub	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)
1	4	Good	Good

Average Height (ft.):	4
Height Range (ft.):	--
Total Tree Count:	1