



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Electronic Mail

December 5, 2006

Mr. Dean Tagliaferro
EPA Project Coordinator
c/o Weston Solutions, Inc.
10 Lyman Street
Pittsfield, MA 01201

Ms. Susan Steenstrup
DEP Project Coordinator
Bureau of Waste Site Cleanup
Department of Environmental Protection
436 Dwight Street
Springfield, MA 01103

**Re: GE-Pittsfield/Housatonic River Site
20s Complex (GEC120)
Summary of Annual ERE Inspection for 2006**

Dear Mr. Tagliaferro and Ms. Steenstrup:

On November 17, 2006, the General Electric Company (GE) performed an inspection of the former 20s Complex at GE's facility in Pittsfield, Massachusetts, in accordance with the Consent Decree (CD) for the GE-Pittsfield/ Housatonic River Site and the Post-Removal Site Control Plan (PRSCP) included in GE's *Final Completion Report for the 20s Complex Removal Action* (March 2005). For this specific area, which was formerly part of the GE Plant Area prior to its transfer to the Pittsfield Economic Development Authority (PEDA) in March 2005, a Grant of Environmental Restriction and Easement (ERE) has been recorded to restrict future uses of the property. Until such time as PEDA conveys an interest in the 20s Complex to another party, GE is required to perform an annual ERE inspection to determine whether, based on review of relevant documents or visual observations, site conditions at the time of the inspection or activities conducted since the last inspection are consistent with the provisions of the ERE. This letter presents the results of the second annual inspection conducted by GE since the transfer of the 20s Complex to PEDA in March 2005.

In accordance with the CD and the PRSCP, the annual ERE inspection is to consist of two components. The first component consists of a review of several ERE-related documents including, as appropriate: i) the ERE itself, ii) the Plan of Restricted Area, iii) any conditional exceptions approved under the ERE (if known), iv) any recorded amendments to and/or releases from the ERE, v) the most recent topographic mapping, and vi) any Post-Work Notification Forms (Exhibit E to the ERE) available to GE. The second component consists of a visual inspection of the 20s Complex to determine whether there is visual evidence that any of the following have occurred since the last annual inspection:

- Activities at or uses of the 20s Complex that are potentially contrary to the restrictions stated in the ERE;
- Utility construction or maintenance work or any building construction, modification, addition, and/or demolition;
- Soil excavations that involved more than 10 cubic yards of soil;
- Significant soil erosion; and

- Significant pavement construction, disturbance, and/or removal/excavation, including, without limitation, alteration of the Other Ground-Covering Feature Area shown on the Plan of Restricted Area.

Following the inspection, GE is required to submit a summary report, which is to include a summary of the findings of the inspection, an identification (based on the visual inspection) of any instances of potential non-compliance with the ERE, and a copy of a completed Annual Inspection Check List (which was provided as an exhibit to the PRSCP).

In November 2006, GE conducted the second annual ERE inspection for the 20s Complex. Since no new ERE-related documentation has been generated since transfer of this area to PEDA, GE reviewed the existing documentation (i.e., ERE, Plan of Restricted Area, and topographic mapping). The visual inspection conducted on November 17, 2006, revealed no change in the physical condition of the property, except for the addition of a temporary soil stockpile placed by EPA on top of the former Building 25 foundation. The visual inspection showed no evidence of any of the above-listed conditions since the time of the initial inspection in November 2005, as documented in the attached Annual Inspection Check List.

Please feel free to contact me at (413) 448-5902 with any questions or comments.

Sincerely,

Michael Carroll/EGB

Michael T. Carroll
Manager, Pittsfield Remediation Programs

Attachment

cc: T. Conway, EPA*
J. Kilborn, EPA
H. Inglis, EPA
R. Howell, EPA*
J. Rothchild, MDEP*
A. Symington, MDEP*
K.C. Mitkevicius, USACE
L. Palmieri, Weston (2 copies)
Mayor J. Ruberto, City of Pittsfield
Pittsfield Department of Health
T. Hickey, Director, PEDA
N.E. Harper, MA AG*

D. Young, MA EOE*
J. Bernstein, Bernstein, Cushner & Kimmel
T. Bowers, Gradient
S. Wilson, CHA
R. McLaren, GE*
A. Silfer, GE*
J. Bieke, Goodwin Procter
S. Gutter, Sidley Austin Brown & Wood
J. Nuss, BBL
GE Internal Repositories
Public Information Repositories

(* without attachments)

**ANNUAL INSPECTION CHECK LIST
20s COMPLEX RAA**

DOCUMENT REVIEW

Conducted By: Mike Hassett Representing: BBL, an ARCADIS company
Review Start Date: November 16, 2006

1. Check here to confirm that the Grant of Environmental Restriction and Easement has been reviewed.
2. Check here to confirm that the Plan of Restricted Area (as revised if appropriate) has been reviewed.
3. Are there any recorded amendments to or releases from the ERE, and/or any known conditional exceptions under the ERE, and/or any Post-Work Notification Forms (ERE Exhibit E) which have been submitted by the Grantor under the ERE and of which the reviewing party has a copy?

No
 Yes - If yes, review those items for background informational purposes and list them below (along with the book and page reference in the Registry of Deeds where applicable). (Note that the document reviewer has no obligation to verify the accuracy or completeness of any of these documents, either as of the time they were prepared or as compared to current conditions).

4. Review Completed: November 16, 2006

VISUAL ON-SITE INSPECTION

Conducted By: Gregg Rabasco/Mike Hassett Representing: BBL, an ARCADIS company
Inspection Start Date: November 17, 2006

1. List other individuals and their company/agency that were present during the visual on-site inspection.

Mike Argue (Weston Solutions on behalf of EPA)

2. Is there any visual evidence of activities and uses of the property since the last inspection that are potentially contrary to the restrictions of the ERE?

No
 Yes - If yes, describe below.

3. Is there any visual evidence of utility work or building construction, modification, addition, or demolition since the last inspection?

No
 Yes - If yes, describe below and show the location(s) of such activity on a plan.

ANNUAL INSPECTION CHECK LIST
20s COMPLEX RAA

4. Is there any visual evidence of soil excavation that generated more than 10 cubic yards of soil since the last inspection?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. Is there any visual evidence of excessive soil erosion since the last inspection?

No

Yes - If yes, describe below and show the location(s) of such erosion on a plan.

6. Is there any visual evidence of significant pavement construction, disturbance, or excavations since the last inspection, including without limitation, alteration of the Other Ground Covering Feature Areas shown on the Plan on the Restricted Areas?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

7. If any of the conditions listed in the responses to Questions 3 through 6 appears to have altered the surface grade of the the property compared to the surface grade shown on the topographic survey map included in Attachment C of the Final Completion Report or the most current drawing of such grade (if available), identify the approximate area/location of such grade change on a plan.

8. Inspection Completed: _____ November 17, 2006 _____