



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

**Re: GE-Pittsfield/Housatonic River Site
40s Complex (GECD120)
Summary of Initial Inspection of Temporary Stockpile Area**

Dear Mr. Tagliaferro:

On November 17, 2006, the General Electric Company (GE) performed an inspection of the temporary stockpile located within the 40s Complex at GE's facility in Pittsfield, Massachusetts, in accordance with Attachment E of GE's July 6, 2005 letter to the U.S. Environmental Protection Agency (EPA) titled *Supplemental Building Material Characterization Report – Buildings 42, 43/43-A, 44* (Characterization Report), as conditionally approved by EPA on August 18, 2005. That document required GE to perform an initial inspection of the vegetative cover on the stockpile within one month after completion of construction, semi-annual inspections for the first year after construction, and annual inspections thereafter consistent with the post-removal site control obligations identified in Attachment J of the *Statement of Work for Removal Actions Outside the River* (Appendix E of the Consent Decree). This letter presents the results of the initial inspection conducted by GE since completing construction of the temporary stockpile and its vegetative cover in October 2006.

In accordance with Attachment E of the Characterization Report, the inspections of the temporary stockpile are to include the following steps:

- Visually inspect the vegetated surfaces for evidence of topsoil erosion, damage to the synthetic components (e.g., the erosion control mat, geotextile), uneven settlement relative to the surrounding/final topography, areas of bare or sparse vegetation, signs of ponding water from storm events, vehicle ruts and/or other visual abnormalities;
- Visually compare the existing surface grades with the final grading plan prepared upon completion of stockpile construction;
- If during the visual inspections, areas that are undisturbed (i.e., those areas not being used to obtain material for backfill/grading purposes) are identified to be deficient with components shown in Figures E-1 and/or E-2 of Attachment E of the Characterization Report, or if surface abnormalities are present, repair those areas and if needed, re-install topsoil and/or seed those areas that are bare or have sparse vegetation; and

- Conduct periodic maintenance of the soil covered areas after vegetation has been established, which will include mowing once every two to three weeks (depending on growth) and, if necessary, watering to keep the vegetative layer from dying.

In November 2006, GE conducted the initial inspection of the temporary stockpile at the 40s Complex. The results are reported on the attached Inspection Check List. This initial inspection revealed that the vegetative cover of the temporary stockpile is beginning to establish itself, with no deficiencies observed or corrective actions required at this time. The next inspection of the stockpile is anticipated to be conducted in April 2007.

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

Sincerely,

Michael Carroll /EG3

Michael T. Carroll
Manager, Pittsfield Remediation Programs

Attachment

cc: T. Conway, EPA*
J. Kilborn, EPA
H. Inglis, EPA
R. Howell, EPA*
S. Steenstrup, MDEP (2 copies)
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, PEDDA
N.E. Harper, MA AG*
D. Young, MA EOEAA*
J. Bernstein, Bernstein, Cushner & Kimmel
T. Bowers, Gradient
S. Wilson, CHA
R. McLaren, GE*
A. Silber, GE*
J. Bieke, Goodwin Procter
S. Gutter, Sidley Austin Brown & Wood
J. Nuss, BBL
GE Internal Repositories
Public Information Repositories

(* without attachments)

EXHIBIT E-1

STOCKPILE AREA INSPECTION CHECK LIST
40s COMPLEX RAA

VISUAL ON-SITE INSPECTION

Conducted By: Gregg Rabasco/Mike Hassett
Inspection Start Date: November 17, 2006

Representing: BBL, an ARCADIS company

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 that the soil cover has been altered since the last inspection?

No*

Yes - If yes, describe below and indicate on a copy of the topographic map.

*Note that this is the first inspection of the stockpile area.

3. Is there any visual evidence that the stockpile is being utilized as a source of backfill/grading material?

No, (go to question 5)

Yes - If yes, describe below and show the location(s) of such activity on a plan, also see question 4.

4. Is the entity using the stockpile as a source of backfill/grading material following the general "house-keeping" practices by maintaining side slopes at a maximum of 25% (4 horizontal to 1 vertical), installation of soil erosion control measures (i.e., silt fence, hay bales), dust suppression measures, and/or other items necessary to control migration of materials from the stockpile?

No - If no, list deficiencies

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

See response to Item 3 above.

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.

*Note that this is the first inspection of the stockpile area and the vegetative cover has not yet completely established itself.

