GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Electronic Mail and Overnight Delivery

May 4, 2007

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 Semi-Annual Inspection of Temporary Stockpile Area

Dear Mr. Tagliaferro:

On April 24, 2007, 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 second inspection conducted by GE since completing construction of the temporary stockpile and its vegetative cover in October 2006 (initial inspection conducted on November 17, 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 on 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.

The results of the April 24, 2007 inspection are reported on the attached Inspection Check List. This inspection revealed sparse vegetation in the southwest corner of the stockpile, as well as sporadically along the plateau. To address this, additional seed will be spread in sparse areas within approximately one month from the date of inspection (i.e., by end of May 2007). In addition, minor erosion was observed along the northern, eastern, and southern side slopes of the stockpile. While not thought to be excessive, as discussed with EPA subsequent to the inspection, GE will also repair these areas by the end of May 2007. GE will notify EPA in writing following the completion of the repair activities. The next inspection of the stockpile is anticipated to be conducted in Fall 2007.

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

Sincerely,

Michael Carroll/MPH

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
T. Hickey, Director, PEDA
J. Bernstein, Bernstein, Cushner & Kimmel*
T. Bowers, Gradient
S. Wilson, CHA
R. McLaren, GE*
A. Silfer, GE*
R. Gates, GE*
J. Bieke, Goodwin Procter
S. Gutter, Sidley Austin Brown & Wood
J. Nuss, ARCADIS BBL
GE Internal Repositories
Public Information Repositories

(* without attachments)

ARCADIS BBL

Attachment

EXHIBIT E-1

STOCKPILE AREA INSPECTION CHECK LIST
40s COMPLEX RAA

VISUAL ON-SITE INSPECTION

Conducted By: Mike Hassett Representing: ARCADIS BBL
Inspection Start Date: April 24, 2007

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?
   [X] No
   [ ] Yes - If yes, describe below and indicate on a copy of the topographic map.

3. Is there any visual evidence that the stockpile is being utilized as a source of backfill/grading material?
   [X] 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?
   [X] No*
   [ ] Yes - If yes, describe below and show the location(s) of such erosion on a plan.

   Minor erosion was observed in certain areas along northern, eastern, and southern side slopes. However, erosion was not excessive, as concurred by Mike Argue (Weston Solutions) during visual inspection.

EXHIBIT E-1

STOCKPILE AREA INSPECTION CHECK LIST
40s COMPLEX RAA

6. Is there any visual evidence of sparse and/or dead vegetation within the stockpile area?
   [ ] No
   [X] Yes - If yes, describe below and show the location(s) of such area(s) on a plan.

   Sparse vegetation observed in southwest corner, as well as sporadically along the plateau.

7. If any of the conditions listed in the responses to Questions 2 through 6 appears to have altered the surface grade of the the property compared to the surface grade shown on the topographic survey map or the most current drawing of the stockpile area (if available), identify the approximate area/location of such grade change on a plan.

8. Inspection Completed: April 24, 2007

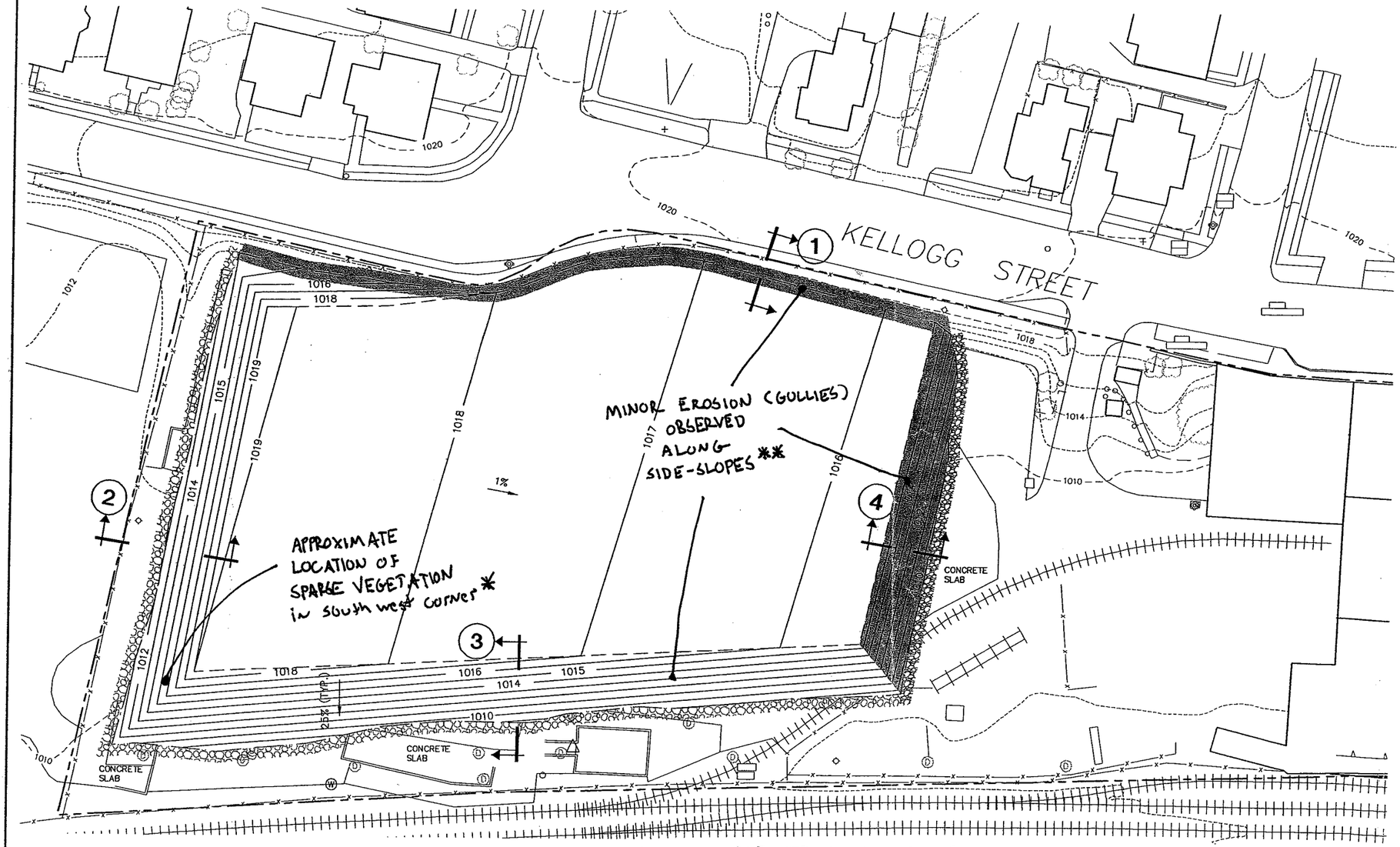
FOLLOW-UP ITEMS

If responses to any of Questions 2 through 6 above were Yes, indicate below the appropriate follow up activity, the entity who will conduct the follow up activity and an approximate schedule for completing each activity.

Additional seed will be spread in sparse areas within approximately one month.

VISUAL FIELD INSPECTION COMPLETED: 4/24/07

MPH



LEGEND:

- 1012 — EXISTING INTERMEDIATE ELEVATION CONTOUR
- 1020 — EXISTING INDEX CONTOUR ELEVATION
- RAILROAD TRACKS
- 1014 — PROPOSED ELEVATION CONTOUR (SEE NOTE 2)
- EXISTING FENCE
- APPROXIMATE PROPERTY LINE LOCATION
- UTILITY POLE
- PROPOSED GRADE BREAK
- PROPOSED RIPRAP (SEE FIGURE C-2)
- PROPOSED 2" STONE (SEE FIGURE C-2)
- EROSION CONTROL MAT (SEE FIGURE C-2)
- PROPOSED LIMIT OF GRADING (SEE NOTE 4)

NOTES:

1. BASE MAP MODIFIED FROM SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS, DATED 6/5/01.
2. FINAL ELEVATIONS SHOWN INCLUDE PLACEMENT OF A 4-INCH THICK TOPSOIL LAYER.
3. ACCESS TO TOP OF STOCKPILE TO BE DETERMINED AT TIME OF CONSTRUCTION.
4. PROPOSED LIMIT OF GRADING SHOWN IS CONCEPTUAL ONLY. ACTUAL LOCATION MAY VARY BASED ON SITE CONDITIONS AT TIME OF CONSTRUCTION.

0 30' 60'
GRAPHIC SCALE

* SPORADIC AREAS OF SPARSE VEGETATION ALSO OBSERVED ALONG PLATEAU

** MINOR EROSION (e.g., gullies) OBSERVED - NOT EXCESSIVE. NO EXPOSED SUBGRADE MATERIAL OBSERVED, NO SEDIMENT TRANSFER OBSERVED BEYOND STOCKPILE LIMITS.

X: 20466X02.DWG
L: ON=*, OFF=REF*, |CATCHBASIN, |CATCHBASIN-ABAN, |shd-bldg, SPOT_TXT, |TOPO_SPOT, |UTIL-DRAIN-MH, |UTIL-SAN-MH, |UTILITY, |UTILITY_LITE
P: AGESET/SYR-DL
7/06/05 SYR-85-NES GWS KLS
C/20466001/20466G03.DWG

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
40s COMPLEX TEMPORARY STOCKPILE

SITE PLAN

BBL® BLASLAND, BOUCK & LEE, INC. engineers, scientists, economists

FIGURE E-1