



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Electronic Mail and Overnight Courier

September 15, 2008

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 (GEC120)
Summary of Annual Inspection of Temporary Stockpile Area**

Dear Mr. Tagliaferro:

On August 28, 2008, 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 was also attached to the Fourth Modification of Consent Decree, which was approved by the Court on June 23, 2006.) 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 fourth inspection conducted by GE since completing construction of the temporary stockpile and its vegetative cover in October 2006. (The initial inspection was conducted on November 17, 2006, and the semi-annual inspections for the first year after construction were conducted on April 24 and October 18, 2007.)

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 August 28, 2008 inspection are reported on the attached Inspection Check List. This inspection revealed that the stockpile remains in overall good condition, with no visible signs of excessive erosion, sparse vegetation, or use as a backfill source. At this time, vegetation has been established and mowing is merited. GE will arrange for the mowing of the stockpile within the next 30 days.

This inspection represents the first of the annual inspections that are to be conducted following the first two semi-annual inspections, which were both completed in 2007. Moving forward, in accordance with Attachment E of the Characterization Report, inspections will continue to be conducted on an annual basis. As such, the next inspection of the stockpile is anticipated to be conducted in August or September 2009.

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*
M. Gorski, MDEP
S. Steenstrup, MDEP
J. Rothchild, MDEP*
A. Symington, MDEP
K.C. Mitkevicius, USACE
L. Palmieri, Weston (2 copies)
Mayor J. Ruberto, City of Pittsfield
T. Hickey, Director, PED A
J. Bernstein, BCK Law

T. Bowers, Gradient
J. Gagnon, O'Reilly, Talbot & Okun
R. McLaren, GE*
A. Silber, GE*
R. Gates, GE*
J. Bieke, Goodwin Procter
S. Gutter, Sidley Austin
J. Nuss, ARCADIS
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: Mike Hassett

Representing: ARCADIS

Inspection Start Date: August 28, 2008

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.

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.

