



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

January 3, 2007

Mr. Dean Tagliaferro
United States Environmental Protection Agency
c/o Weston
10 Lyman Street
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
East Street Area 2-South (GEC150)
Summary of November 2006 Inspection Activities – City Recreational Area**

Dear Mr. Tagliaferro:

On November 30, 2006, the General Electric Company (GE) performed the second post-remediation inspection of the City Recreational Area located within a portion of the GE Plant Area in Pittsfield, Massachusetts at which activities have been performed. The City Recreational Area, currently leased to the City of Pittsfield for its use as a multi-functional recreational area, consists of two sub-areas – designated on Figure 1 as the Ballfield Area and the Access Road Area. Soil remediation activities, construction of the athletic fields and ancillary facilities, and site restoration activities within the City Recreational Area were completed by GE in June 2004 in accordance with GE's *Removal Design/Removal Action Work Plan for the Future City Recreational Area* (RD/RA Work Plan, December 2001), as conditionally approved by EPA on April 18, 2002, revised in an April 2003 RD/RA Work Plan Addendum, and subsequently conditionally approved by EPA on June 11, 2003.

GE conducted the initial post-remediation inspection of this property on November 18, 2005. A summary of the November 2005 inspection activities was submitted to EPA in a letter dated December 20, 2005. The inspection was conducted in accordance with the Post-Removal Site Control Plan set forth in Section 7.3 of April 2003 RD/RA Work Plan Addendum. Consistent with the previous inspection, this inspection included observations of the condition of the soil and gravel cover areas, areas where vegetation was planted, and the perimeter fencing.

Summary of Inspection Activities

As required by the RD/RA Work Plan Addendum, the November 2006 inspection consisted of visual observations focusing on the soil cover and the perimeter fencing to identify potential problems associated with such areas. Specifically, this inspection included visual observations of the following:

- Soil cover areas to identify any conditions that would affect the integrity of the cover including: (a) evidence of failure or other significant alteration of the cover, including erosion and uneven settlement relative to surrounding areas; (b) evidence of animal burrows, unauthorized excavation, or other conditions that could jeopardize the integrity of the cover.

- Access road/parking to ensure that nothing (i.e., erosion, unauthorized excavation, etc.) has occurred that would significantly reduce the post-remediation elevations in these areas;
- Any evidence of damage to the geotextile liner installed at the Access Road Area; and
- Perimeter fence to identify potential evidence of unauthorized entry to use of the City Recreational Area.

In addition, the November 2006 inspection included visual observations of the restored areas, focusing on the following: (a) in areas where vegetation has been planted, the condition of the vegetation, including any evidence of stressed vegetation or sparse cover to ensure that it was growing as anticipated and providing erosion control; and (b) other conditions that could jeopardize the performance of the completed remediation actions.

The November 2006 inspection also included observations of the areas at which the need for follow-up activities had been identified during the prior inspection. As indicated in GE's December 20, 2005 report on the November 2005 inspection, the only such areas at the City Recreational Area were the erosional gully observed along the southern fenceline of the Ballfield Area and the soil areas within the Access Road Area that were devoid of vegetation. Since that time, the gully was repaired and re-seeded on December 2, 2005 by GE. The soil areas within the Access Road Area remain devoid of vegetation. GE will discuss with the City the necessary actions to be taken to address these areas.

To document the results of the November 2006 inspection, GE completed an Inspection Summary and Checklist for the City Recreational Area. A copy of the completed form is provided in Attachment A. This form was used during the previous inspection and will continue to be used to document future inspections and to track the completion of identified maintenance activities.

Summary of Observations During Inspection

The November 2006 inspection indicated that the inspected properties at the City Recreational Area were in good overall condition. As indicated on the form in Attachment A, the observations during the inspection showed the following:

- Portions of the access road contained piles of construction materials (i.e., sand, topsoil, asphalt, crushed stone), numerous concrete footings, and a large stone slab. GE will discuss with the City the necessary actions to be taken to address these areas.
- Certain areas adjacent to gravel surfaces were devoid of vegetation (due to vehicle traffic/parking). GE will discuss with the City the necessary actions to be taken to address these areas.

Schedule for Future Inspections

In accordance with the RD/RA Work Plan Addendum, the City Recreational Area will continue to be inspected annually (until EPA approves an alternative frequency) to assess the integrity of the soil cover and perimeter fencing. Additionally, the areas at which vegetation was planted as part of the restoration will be inspected to ensure that the vegetation is continuing to grow as anticipated and is providing the necessary erosion control. 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 Gates /EGB

Richard Gates
Remediation Project Manager

Attachment

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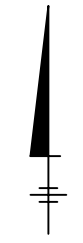
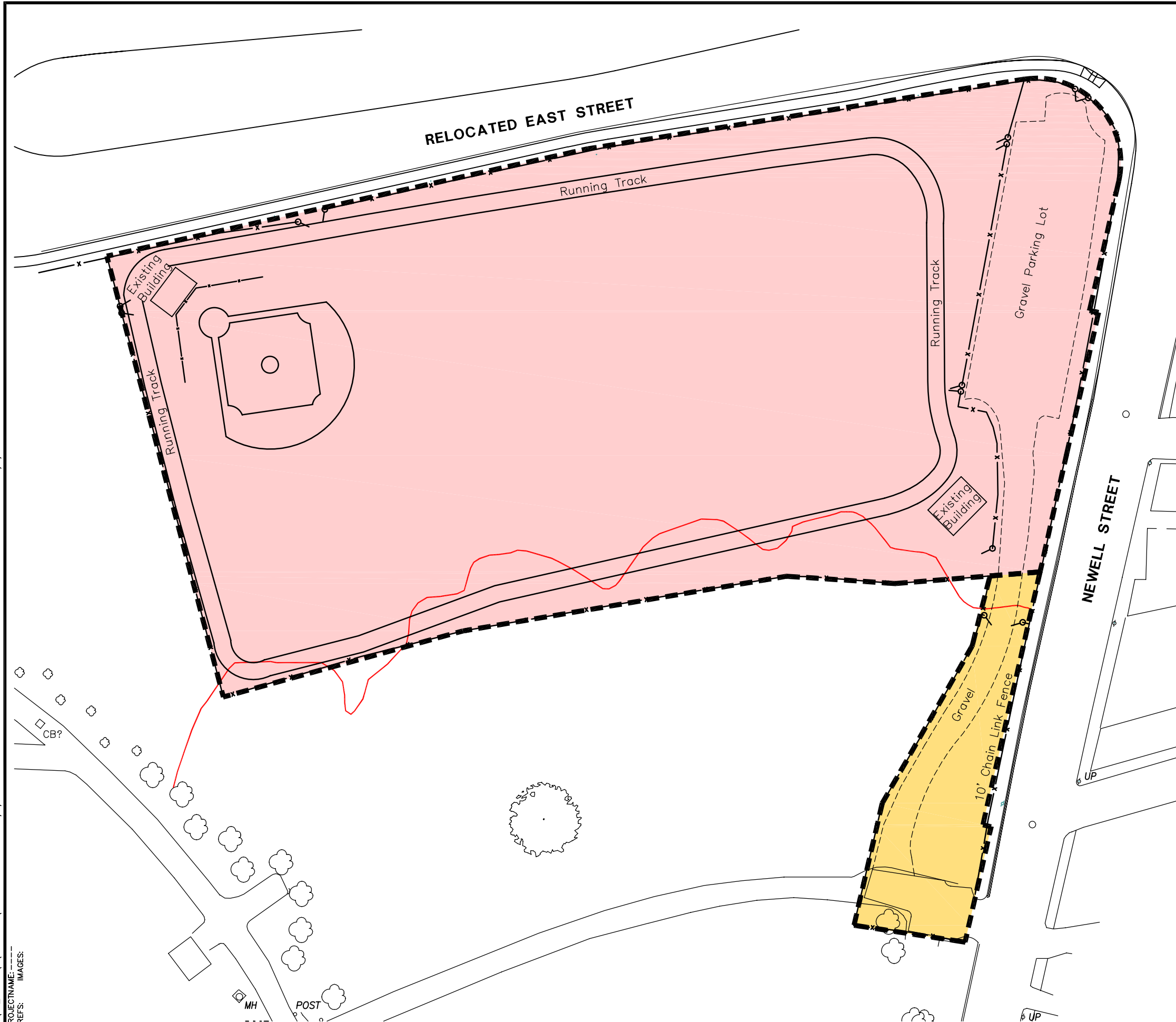
cc: Sharon Hayes, EPA
Tim Conway, EPA*
John Kilborn, EPA
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston
Susan Steenstrup, MDEP
Anna Symington, MDEP*
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Figure

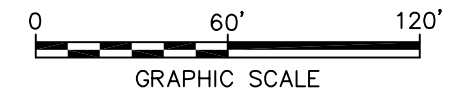
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LEGEND:

- APPROXIMATE 100-YEAR FLOODPLAIN
- EXISTING PERIMETER 10' CHAIN LINK FENCE
- BALLFIELD AREA
- ACCESS ROAD AREA

- NOTES:**
1. MAPPING IS BASED ON SURVEY PROVIDED BY WHITE ENGINEERING, INC. DATED 12/4/01.
 2. ALL SAMPLING LOCATIONS ARE APPROXIMATE.



GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS	
SUMMARY OF NOVEMBER 2006 INSPECTION ACTIVITIES - CITY RECREATIONAL AREA	
BALLFIELD AREA AND ACCESS ROAD AREA	
	FIGURE 1

Attachment A

Completed Inspection Form

**INSPECTION SUMMARY AND CHECKLIST
CITY RECREATIONAL AREA**

I. GENERAL INFORMATION

Inspection Date: 11/30/06
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 60°F
Date of Last Inspection: 11/18/05

II. INSPECTION SUMMARY

1. **Ballfield Area - Vegetative Cover** *(Note any physical changes since last inspection; note any surface cover alterations, erosion/burrows, uneven settlement, unauthorized excavation, unanticipated uses of area, etc.)*

- Dugout structures have been installed and are in good condition.
- All other areas in good condition.

2. **Parking Area / Access Road Area** *(Note any physical changes since last inspection; note any surface alterations, erosions/burrows, uneven settlement, exposed geotextile material, unauthorized excavation, unanticipated uses of area, etc.)*

- Gravel surfaces are all in good condition.
- Some areas adjacent to gravel surfaces remain void of vegetation due to vehicle traffic/parking.

3. **Fencing / Gates / Access Controls** *(Note any physical changes since last inspection; note overall condition and integrity, evidence of unauthorized access, etc.)*

- All fencing in good condition.

4. **Other Observations** *(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations)*

- Portions of Access Road (adjacent to entrance) contain sand, topsoil/asphalt and crushed stone piles.
- Area also contains numerous concrete footings and a large stone slab.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Address areas adjacent to gravel surfaces noted above with City.
- Address above mentioned material piles and debris with City.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE