



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted via Overnight Courier*

November 21, 2007

Mr. Richard Fisher  
United States Environmental Protection Agency  
One Congress Street, Suite 1100 (HBO)  
Boston, MA 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
East Street Area 2-South (GEC150)  
Summary of October 2007 Inspection Activities – City Recreational Area**

Dear Mr. Fisher:

On October 24, 2007, the General Electric Company (GE) performed the required post-remediation inspection of the City Recreational Area located within a portion of the GE Plant Area in Pittsfield, Massachusetts. 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).

Previous post-remediation inspections were performed in November 2005 and November 2006. The inspections were conducted in accordance with the Post-Removal Site Control Plan set forth in the April 2003 RD/RA Work Plan Addendum.

### **Summary of Inspection Activities**

The October 2007 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 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; and (b) evidence of animal burrows, unauthorized excavation, or other conditions that could jeopardize the integrity of the cover;
- Access road/parking to ensure that erosion, unauthorized excavation, etc., that would significantly reduce the post-remediation elevations in these areas, has not occurred;
- 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 October 2007 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 October 2007 inspection also included observations of the specific areas where the need for follow-up activities had been identified during the prior inspection. The results of the October 2007 inspection are included in an Inspection Summary and Checklist for the City Recreational Area (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 October 2007 inspection indicated that the inspected areas within 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:

- A large section of stone curbing is staged along the southern fence line. GE will discuss the necessary action to be taken with the City.
- Certain areas adjacent to the access road remain devoid of vegetation due to vehicle traffic/parking. GE will discuss this issue with the City again.

The November 2006 inspection at the City Recreational Area identified portions of the access road that contained piles of construction materials and soil areas within the Access Road Area that were devoid of vegetation. Since that time, the piles of construction materials have been removed by the City. The soil areas within the Access Road Area remain devoid of vegetation due to the use of these areas for vehicle traffic/parking. GE has notified the City of this and no actions have been performed.

### **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 W. Gates/SME*

Richard W. Gates  
Remediation Project Manager

Attachments

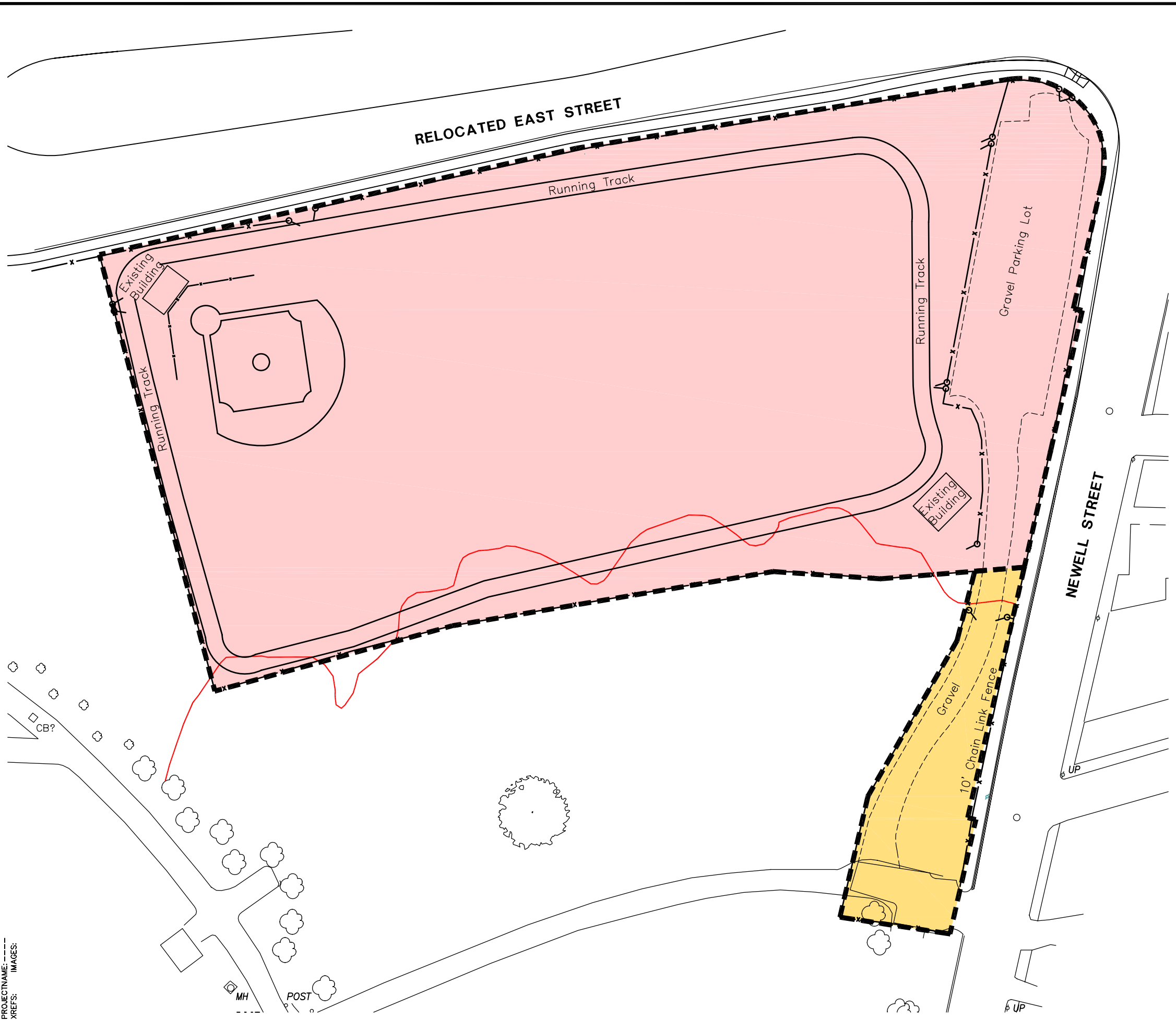
cc: Dean Tagliaferro, EPA  
Tim Conway, EPA\*  
John Kilborn, EPA  
Holly Inglis, EPA  
Rose Howell, EPA\*  
Linda Palmieri, Weston  
Susan Steenstrup, MDEP  
Anna Symington, MDEP\*  
Jane Rothchild, MDEP\*  
Mayor J. Ruberto, City of Pittsfield

Thomas Hickey, PEDA  
Michael Carroll, GE\*  
Rod McLaren, GE\*  
Andrew Silber, GE\*  
Peter Wojcik, GE\*  
James Bieke, Goodwin Procter  
James Nuss, ARCADIS BBL  
Public Information Repositories  
GE Internal Repository

*\* cover letter only*

Figure

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 PROJECTNAME: ---  
 XREFS: IMAGES: ---



**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 OCTOBER 2007 INSPECTION  
 ACTIVITIES - CITY RECREATIONAL AREA**

**BALLFIELD AREA AND ACCESS  
 ROAD AREA**

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**ARCADIS** BBL  
*infrastructure, environment, facilities*

FIGURE  
**1**

**Attachment A**

Completed Inspection Form

**INSPECTION SUMMARY AND CHECKLIST  
CITY RECREATIONAL AREA**

**I. GENERAL INFORMATION**

Inspection Date: 10/24/07  
Conducted By: Paolo Filippetti  
Weather Conditions: Cloudy - 60°F  
Date of Last Inspection: 11/30/06

**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.)

- All 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.)

- Access road in good condition.

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

- All areas in good condition.

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

- Piles of construction materials have been removed.
- One large section of stone curbing is staged along southern fence line.
- Traffic has been traversing across grass between access road and Newell Street. Grass is no longer present in this area.

**III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES**

- Inform City of traffic issue identified above.
- Inform City of stone curbing.

**ATTACH ADDITIONAL INFORMATION AS APPROPRIATE**