



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

October 16, 2008

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

**Re: GE-Pittsfield/Housatonic River Site
East Street Area 2-South (GECD150)
Summary of September 2008 Inspection Activities – City Recreational Area**

Dear Mr. Fisher:

On September 17, 2008, the General Electric Company (GE) performed the annual post-remediation inspection of the City Recreational Area located within a portion of the East Street Area 2-South Removal Action Area at the GE Plant in Pittsfield, Massachusetts. The City Recreational Area, which is currently leased to the City of Pittsfield for its use as a multi-functional recreational area, consists of two sub-areas – 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* (December 2001) and an addendum to that work plan dated April 2003. Previous post-remediation inspections were performed in November 2005, November 2006, and October 2007; and reports on those inspections were submitted to EPA.

The September 2008 inspection was performed in accordance with the Post-Removal Site Control requirements specified in the *Final Completion Report for the City Recreational Area* (Final Completion Report), which was submitted to EPA on July 31, 2008 and approved by EPA on August 27, 2008. This inspection included observations of the soil cover and the perimeter fencing, as shown on Figure 3 of the Final Completion Report, a copy of which is attached hereto.

Summary of Inspection Activities

The September 2008 inspection consisted of visual observations of the Ballfield Area and the Access Road Area focusing on the soil cover and the perimeter fencing. Specifically, this inspection included observations of the following:

- Surface cover area to identify any evidence of failure or other significant alteration of the cover, including erosion and uneven settlement relative to surrounding areas;
- Surface cover for evidence of animal burrows, unauthorized excavation, or other conditions that could jeopardize the integrity of the cover;

- Concrete portions of the surface cover in the restroom facility, scorer's booth, and dugouts to assess the overall function and integrity of the cover in those areas;
- Access road/parking area to ensure that nothing (e.g., 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;
- Perimeter fence to identify potential evidence of unauthorized entry or use of the City Recreational Area ;
and
- Perimeter fence to identify potential evidence of unauthorized access to East Street Area 2-South from the City Recreational Area.

The results of the September 2008 inspection are included in an Inspection Summary and Checklist for the City Recreational Area, using the form included in the Final Completion Report. The completed form for the September 2008 inspection is included.

Summary of Observations During Inspection

The September 2008 inspection indicated that the inspected areas within the City Recreational Area were in good overall condition. However, a few conditions were noted as requiring maintenance. These were as follows:

- Some areas of non-woven geotextile fabric (used for erosion control) are exposed in the rip-rap area behind the scorer's booth;
- A small hole was identified in the sod adjacent to the outer fence and near the center field of the ballfield;
and
- The lock on the gate at the corner of East Street and Newell Street was damaged.

Maintenance/Repair Activities

Based on the September 2008 inspection, the following maintenance activities were identified:

- Rip-rap needs to be placed in areas with exposed non-woven geotextile fabric behind the scorer's booth;
- The small hole in the sod needs to be filled and seeded; and
- The damaged lock needs to be replaced.

The following activities were completed in September following the inspection:

- Repair of the small hole adjacent to the outer fence with the addition of topsoil and grass seed; and
- Installation of a chain and master lock to keep the gate closed and locked.

Rip-rap will be added to the exposed areas of non-woven geotextile fabric behind the scorer's booth this fall.

Schedule for Future Inspections

In accordance with the approved Final Completion Report, the soil cover and perimeter fencing will be inspected annually in August or September (subject to EPA approval of a different frequency), as well as after severe storms. The next such scheduled inspection will be conducted in August or September 2009. Future inspections of the City Recreational Area will be conducted in accordance with the Post-Removal Site Control Plan included in the Final Completion Report. 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/EGG

Richard W. Gates
Remediation Project Manager

Attachments

cc: Dean Tagliaferro, EPA
Tim Conway, EPA*
John Kilborn, EPA
Holly Inglis, EPA
Rose Howell, EPA*
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Michael Gorski, MDEP
Susan Steenstrup, MDEP
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Teresa Bowers, Gradient
Thomas Hickey, PEDA
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Rod McLaren, GE*
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James Bieke, Goodwin Procter
James Nuss, ARCADIS
Public Information Repositories
GE Internal Repository

* cover letter only

**INSPECTION SUMMARY AND CHECKLIST
CITY RECREATIONAL AREA**

I. GENERAL INFORMATION

Inspection Date: 9/17/08
 Conducted By/Phone Number: Gregg Rabasco (413) 822-1184
 Weather Conditions: Sunny, 65°F
 Date of Last Inspection: 10/24/07

II. INSPECTION SUMMARY

1. Confirm that Figure 3 from the *Final Completion Report for the City Recreational Area* and the as-built survey drawings included in Appendix E of that document have been reviewed.

- Confirmed

2. **Ballfield Area - Surface Cover** (Note any physical changes since last inspection; note any evidence of any of the following: surface cover failure or other significant alterations, erosion, uneven settlement relative to surrounding areas, animal burrows, unauthorized excavation, other conditions that could jeopardize the integrity of the cover, etc.)

- Some areas of non-woven geotextile fabric are exposed in the rip-rap area behind the scorer's booth.
- A small hole was observed in the sod adjacent to the outer fence and near the centerfield of the ballfield.

3. **Ballfield Area - Concrete Portions of Surface Cover** (Note any physical changes since last inspection; note any evidence of conditions that would adversely affect the function and integrity of concrete portions of the surface cover in the restroom facility, scorer's booth, and dugouts.)

- All areas in good condition.

4. **Access Road / Parking Area** (Note any physical changes since last inspection; note any evidence of any of the following: surface alterations, erosion/burrows, uneven settlement, exposed geotextile, damage to the geotextile, unauthorized excavation, other conditions that could significantly reduce the post-remediation elevations in these areas, etc.)

- All areas in good condition.

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

- Gate at the corner of East Street and Newell Street has a broken latch. General Electric Company's lock is damaged.

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

- None

**INSPECTION SUMMARY AND CHECKLIST
CITY RECREATIONAL AREA**

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES



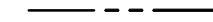






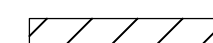
- Place rip-rap in areas of exposed non-woven geotextile fabric in the rip-rap area behind the scorer's booth.
 - GE filled the small hole adjacent to the outer fence with topsoil and grass seed (completed September 23, 2008).
 - A chain and a master lock have been installed to keep the above-referenced gate closed and locked.
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ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

CITY: SYRACUSE DIV/GRP: 141 DB: GMS DMW GMS LD: DMW PM: S. ELLSWORTH LVR: ON= OFF=REF
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 XREFS: 31017X00 PROJECTNAME: ---



LEGEND:

-  APPROXIMATE LIMITS OF SURFACE COVER
-  APPROXIMATE LIMITS OF ACCESS ROAD AREA
-  PROPERTY LINE
-  LIGHT POST
-  GATE
-  CHAIN LINK FENCE
-  BUILDING/STRUCTURE
-  UNPAVED (GRASS/DIRT/GRAVEL)
-  PAVED (ASPHALT)
-  ACCESS ROAD/PARKING AREA

NOTES:

1. MAPPING IS BASED ON SURVEY PROVIDED BY WHITE ENGINEERING, INC. DATED 12/4/01.
2. THE LOCATIONS OF SITE FEATURES (INCLUDING THE SCORER'S BOOTH, DUGOUTS, RESTROOM FACILITY, FENCING, GATES, LIGHT POSTS, AND WALKING TRACK) ARE BASED ON SURVEY PROVIDED BY FORESIGHT LAND SERVICES (PERFORMED BETWEEN JULY 29, 2004 AND SEPTEMBER 6, 2006).



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
**FINAL COMPLETION REPORT FOR THE
 CITY RECREATIONAL AREA**

**AREAS/ITEMS SUBJECT TO
 INSPECTION**


 **ARCADIS**

FIGURE
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