



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

July 9, 2008

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

**Re: GE-Pittsfield/Housatonic River Site
East Street Area 2-North (GEC140)
Summary of June 2008 Inspection Activities**

Dear Mr. Fisher:

On June 11, 2008, the General Electric Company (GE) performed the initial post-remediation inspection of the East Street Area 2-North Removal Action Area (RAA) (Figure 1). In accordance with GE's *Final Removal Design/Removal Action Work Plan for East Street Area 2-North* (Final RD/RA Work Plan) and Final RD/RA Work Plan Addendum, as conditionally approved by the U.S. Environmental Protection Agency (EPA), GE conducted soil remediation activities at East Street Area 2-North (as shown on Figure 2), completing those actions in February and March 2008. In addition, restoration actions were conducted in April and May 2008 in accordance with the Final RD/RA Work Plan.

Summary of Inspection Activities

The June 2008 inspection was conducted in accordance with GE's modified Post-Removal Site Control Plan (Attachment E to the Final RD/RA Work Plan) submitted to EPA on October 31, 2007 (Modified Post-Removal Site Control Plan), as conditionally approved by EPA on November 15, 2007. Consistent with that plan, the inspection assessed: (a) the unpaved areas that had been backfilled and restored; and (b) certain paved areas that GE has elected to maintain as paved, as described below.

For the unpaved areas, the inspection involved visual observations of the backfilled and restored areas, focusing on the following: (a) evidence of topsoil or gravel erosion (depending on cover type); (b) effectiveness of erosion controls in areas where vegetation is not established; (c) evidence of depressions and/or surface water ponding; (d) any areas where excessive settlement has occurred relative to the surrounding areas; (e) any drainage or growth problems; and (f) other conditions that could jeopardize the performance of the completed remediation actions. In addition, in areas that had been revegetated with grass (no trees or shrubs were planted), the inspection included observations of the vegetation to assess the establishment, coverage, and condition of the vegetation and to ensure that the vegetation is growing as anticipated and providing the desired degree of erosion control.

For the paved areas that GE has elected to maintain as paved (which are shown on Figure E-1 of the Modified Post-Removal Site Control Plan and include building foundation areas), the Modified Post-Removal Site Control Plan requires the inspection of all those areas (which are not covered by buildings at the time of the inspection) for excessive cracking, fissures, spalling, rutting, potholes, or exposed subgrade material. It also requires the inspection of the paved areas that were subject to remediation activities for

certain other conditions. In this case, on May 22, 2008, GE performed a pavement inspection site walk with EPA of all areas within this RAA that GE has elected to maintain as paved. That inspection identified three small areas that required attention. These areas were repaired with asphalt patch immediately following the inspection to EPA's satisfaction, and thus no further inspection or maintenance actions are required at this time for the paved areas that were not remediated. Therefore, the June 2008 inspection of the paved areas focused only on those areas that were subject to remediation/restoration. This inspection consisted of visual observations, focusing on: (a) evidence of excessive cracking, fissures, spalling, rutting, potholes, or exposed subgrade material; (b) evidence of exposed subbase materials; (c) excessive settlement relative to the surrounding areas; (d) any drainage problems; and (e) other conditions that could jeopardize the performance of the completed remediation.

To document the results of this inspection, GE completed an Inspection Summary and Checklist for East Street Area 2-North (Parcel J10-9-2). A copy of the completed form is provided as an attachment to this letter.

Summary of Observations During Inspection

The June 2008 inspection indicated two areas that required maintenance. Specifically, the inspection identified the need to conduct the following maintenance activities:

- Replace haybales (erosion control) at small area of erosion south of Building 12-T on the railroad side of the RAA fence; and
- Repair a small area of missing pavement on the south edge of the paved area north of Building 9-D with asphalt patch.

Both of the above-listed maintenance activities were performed at the time of inspection. Therefore, no further action is required at this RAA at this time.

Schedule for Future Inspections

Future inspections at East Street Area 2-North will be conducted in accordance with the applicable requirements of the Modified Post-Removal Site Control Plan – or, following submission and EPA approval of a Final Completion Report for the East Street Area 2-North Removal Action, the Post-Removal Site Control Plan set forth in that report. The unpaved backfilled/restored areas and the paved/building foundation areas that GE elects to maintain as paved (as well as any paved/building foundation areas that are covered with a soil cover in the future) will be inspected in August or September 2008, May 2009, and annually thereafter (in May) (subject to EPA approval of a different frequency). The unpaved backfilled/restored areas will also be inspected following severe storms to verify that these areas have not sustained significant damage. In addition, the revegetated areas will be inspected twice per year for a two-year period after planting (i.e., in August or September 2008, May and August or September 2009, and May 2010).

These inspections will utilize an Inspection Summary and Checklist form similar to that attached hereto or, following EPA approval of the Final Completion Report, the Inspection Summary and Checklist form included therein. Within 30 days 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
Remediation Project Manager

Attachment

cc: Dean Tagliaferro, EPA
Tim Conway, EPA*
John Kilborn, EPA
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Attachment A

Inspection Summary and
Checklist Form

INSPECTION SUMMARY AND CHECKLIST

EAST STREET AREA 2 - NORTH

PARCEL J10-9-2

I. GENERAL INFORMATION

Inspection Date: 6/11/2008
Conducted By/Phone Number: Gregg Rabasco / (413) 822-1184
Weather Conditions: Mostly sunny, 80-85°F
Date of Last Inspection: NA

II. INSPECTION SUMMARY

1. **Soil Backfill Areas** (Note evidence of erosion, excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)

- Small area of erosion south of Building 12-T. Erosion is on railroad side of fence.

2. **Vegetation Area** (Note general condition of vegetative cover (e.g., evidence of stressed/sparse cover) and other landscaping items (trees, shrubs, etc.)

- All areas in good condition. Grass is growing well.

3. **Paved Areas Subject to Inspection** (Inspect the paved areas that are identified on Figure E-1 of the Revised Attachment E to the Final RD/RA Work Plan (Attachment E - Post-Removal Site Control Plan), and note evidence of any locations where the pavement is broken up and/or missing and soil is clearly visible.)

- Small area of missing pavement on the south edge of the paved area north of Building 9-D.

4. **Other Observations** (Note any other general observations, including parcel-specific restoration activities.)

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- None

- Gregg Rabasco of ARCADIS repaired paved area with asphalt patch and repaired erosion with hay bales at time of inspection.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE