GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted Via Overnight Delivery

September 26, 2005

Mr. William P. Lovely, Jr.
United States Environmental Protection Agency
EPA New England (MC HBO)
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Re: GE-Pittsfield/Housatonic River Site
Former Oxbow Areas A and C (GECD410)
Addendum to Final Removal Design/Removal Action Work Plan

Dear Mr. Lovely:

On July 5, 2005, the General Electric Company (GE) submitted to the United States Environmental Protection Agency (EPA) a document titled *Final Removal Design/Removal Action Work Plan for Former Oxbow Areas A and C* (Final RD/RA Work Plan). EPA provided conditional approval of that work plan in a letter to GE dated August 30, 2005. In that letter, EPA directed GE to submit an Addendum to the Final RD/RA Work Plan (Addendum) to provide further detail regarding the drainage swale located at the east side of Parcel I8-23-6. That detail was to include the placement of the rip-rap along the banks and bottom of the swale, the limit of additional tree clearing, and the need for any sediment removal from within the swale. This letter serves as the Addendum. The remainder of this letter and the attached Figure 1 provide the further details required by the August 30, 2005 conditional approval letter.

The section of the drainage swale at issue is located at the end of Day Street and runs approximately 120 feet north to the concrete culvert and weir structure constructed by EPA as part of the 1 ½-Mile Removal. The drainage swale conveys storm flows from a concrete discharge pipe at the end of Day Street.

Prior to the placement of rip-rap, GE proposes to clear brush materials and remove accumulated debris (e.g., wood, bicycles, furniture, etc.) within and adjacent to the drainage swale. As shown on Figure 1, GE proposes to remove trees with a diameter less than 6 inches (at breast height) and boulders/concrete blocks less than 12 inches in their largest dimension, in the area of the swale to be covered with riprap. Trees and boulders/concrete blocks larger than those proposed for removal are also shown on Figure 1. Following the above-referenced removal activities, GE proposes to remove the accumulated sediment in the areas shown on Figure 1 to the approximate elevation of the bottom of the swale in the surrounding areas. In addition, GE proposes to place an approximately 12-inch thickness of rip-rap across the bottom and along the lower 2 feet of the banks of the drainage swale shown on Figure 1. Non-woven geotextile (10 oz.) will be placed below the riprap above the toe of bank and across the bottom of the swale. Specifications related to the size of riprap to be used are indicated on Figure 1. Sediment and soil within the bottom of the swale will be removed to a depth of approximately 1-foot prior to the placement of the riprap. In addition, riprap will be placed around larger trees and boulders/concrete blocks that are not subject to removal. Additional removal or regrading of soil will be performed at areas where existing

slopes will not otherwise allow for the stable placement of riprap. Based on the completed construction, GE will determine if there are any potential changes in flood storage capacity and propose to EPA to offset any such loss with compensatory flood storage.

As indicated in the Conceptual RD/RA Work Plan and Final RD/RA Work Plan, no soil removal is necessary within or adjacent to the drainage swale area to satisfy the applicable Performance Standards. However, as described above, sediment removal within the drainage swale and soil removal or regrading within its banks, will be conducted to accommodate construction activities. During sediment and soil removal activities, the selected Contractor will be responsible for providing the appropriate water diversion measures. The anticipated water diversion measures include an upstream diversion structure, bypass pumps and piping, and dewatering of the drainage swale.

Please call Dick Gates if you have any questions about this Addendum.

Sincerely,

Andrew T. Silfer, DAT

Andrew T. Silfer, P.E.
GE Project Coordinator

Enclosures
V:\GE_Pittsfield_CD_Former_Oxbow_Areas_A_and_C\Reports and Presentations\Final RDRA WP\57952196Ltr.doc

cc: Dean Tagliaferro, EPA
Rose Howell, EPA*
Holly Inglis, EPA
Tim Conway, EPA
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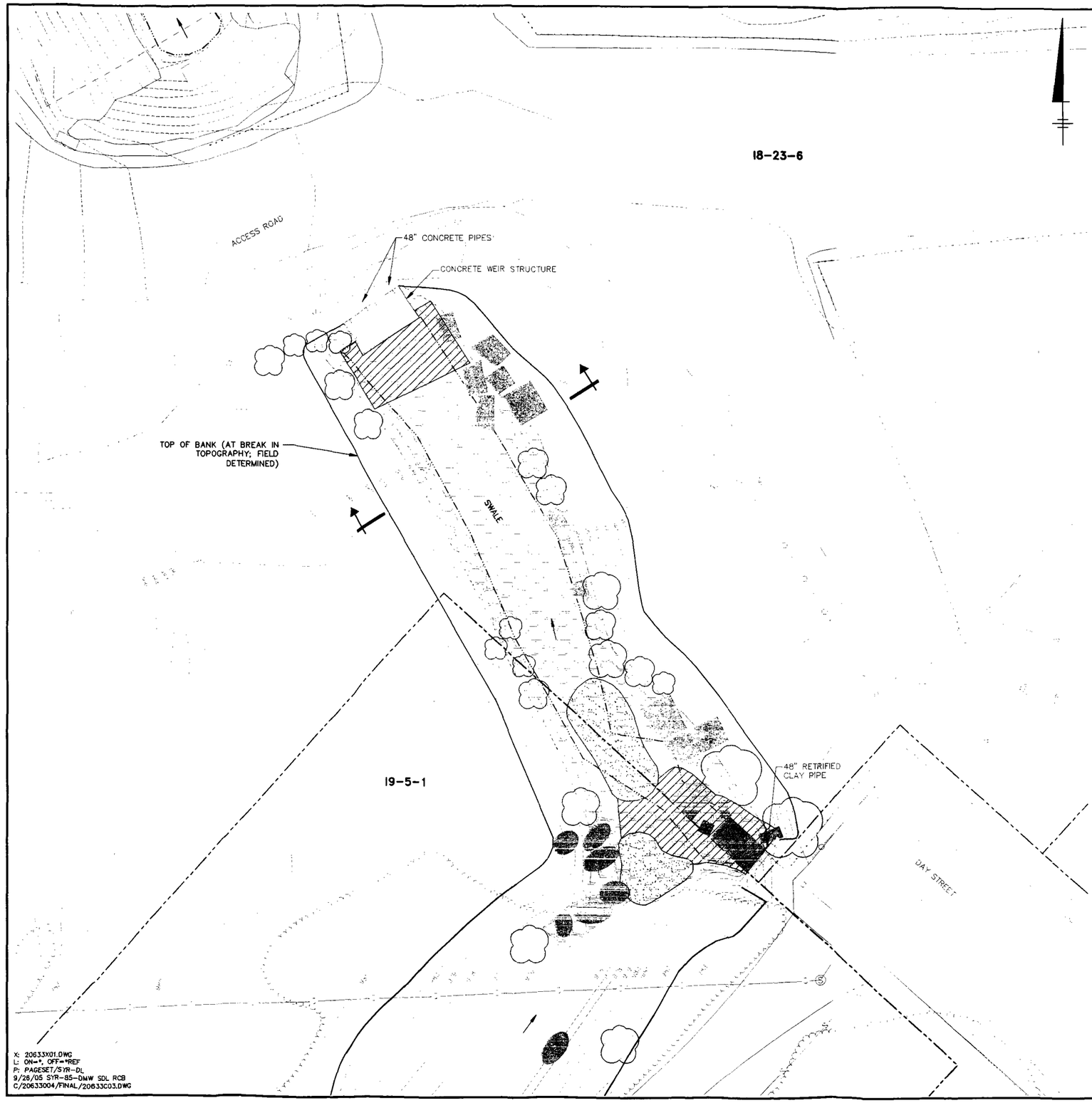
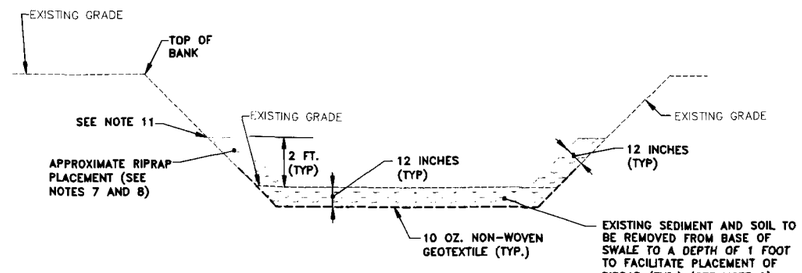
Nancy E. Harper, MA AG*
Dale Young, MA EOEA*
Mayor James Ruberto, City of Pittsfield
Linda Palmieri, Weston
Michael Carroll, GE*
Richard Gates, GE
Rod McLaren, GE*
James Nuss, BBL
James Bieke, Goodwin Procter
Property Owner – Parcels I8-23-6 and I9-5-1
Public Information Repositories
GE Internal Repository

** cover letter only*





TYPICAL SWALE SECTION

NOT TO SCALE

LEGEND:

- PROPERTY BOUNDARY
- EDGE OF WATER
- EXISTING VEGETATION
- EXISTING INDEX ELEVATION CONTOUR
- EXISTING INTERMEDIATE ELEVATION CONTOUR
- CHAIN LINK FENCE
- GUARDRAIL
- SANITARY SEWER
- STORM DRAIN LINE
- EDGE OF GRAVEL ROAD
- SANITARY MANHOLE
- TREE (SEE NOTES 5 AND 6)
- BOULDER/CONCRETE BLOCK (SEE NOTES 5 AND 6)
- APPROXIMATE RIPRAP PLACEMENT (SEE NOTES 7 AND 8)
- SEDIMENT ACCUMULATION (SEE NOTES 4 AND 9)
- AREA OF ACCUMULATED DEBRIS REMOVAL (SEE NOTES 4 AND 10)
- DRAINAGE FLOW DIRECTION
- 18-23-6 PARCEL ID

NOTES:

1. MAPPING IS BASED ON SITE SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS, INC., DATED 11/4/04.
2. SAMPLE LOCATIONS ARE APPROXIMATE.
3. UTILITY LOCATIONS SHOWN ARE APPROXIMATE. ADDITIONAL UTILITIES/FEATURES (ABOVE AND BELOW GROUND) MAY BE PRESENT. THE LOCATIONS OF WHICH ARE NOT KNOWN.
4. LOCATIONS OF SOIL AND DEBRIS TO BE REMOVED ARE APPROXIMATE. ACTUAL LOCATIONS SHALL BE CONFIRMED BEFORE WORK COMMENCES.
5. LOCATIONS OF TREES AND BOULDERS/CONCRETE BLOCKS ARE APPROXIMATE. ACTUAL LOCATIONS SHALL BE CONFIRMED BEFORE WORK COMMENCES. TREES WITH DIAMETERS GREATER THAN 6 INCHES ARE SHOWN.
6. TREES WHICH ARE GREATER THAN 6 INCHES IN DIAMETER AT BREAST-HEIGHT AND ADDITIONAL BOULDERS/CONCRETE BLOCKS GREATER THAN 12 INCHES IN LARGEST DIMENSION SHALL REMAIN IN PLACE. ALL OTHER TREES, VEGETATION, BOULDERS, AND CONCRETE BLOCKS WITHIN THE LIMITS OF RIPRAP SHALL BE REMOVED AND APPROPRIATELY DISPOSED.
7. RIPRAP SHALL BE IN CONFORMANCE WITH SECTION M2.02.0 OF THE MASSACHUSETTS HIGHWAY DEPARTMENT'S STANDARD SPECIFICATIONS FOR HIGHWAY AND BRIDGES. RIPRAP SHALL HAVE A Dmin = 4 INCHES, D50 = 6 INCHES, AND Dmax = 8 INCHES.
8. RIPRAP WILL BE PLACED ACROSS BOTTOM OF DRAINAGE SWALE AND BANKS AS SHOWN. RIPRAP SHALL BE PLACED BETWEEN TREES AND BOULDERS/CONCRETE BLOCKS AS NECESSARY TO ACHIEVE A STABLE SLOPE CONDITION.
9. SEDIMENT ACCUMULATION AREAS WITHIN THE DRAINAGE SWALE (AT THE APPROXIMATE LOCATIONS INDICATED) SHALL BE REMOVED AND APPROPRIATELY DISPOSED. IN ADDITION SOIL AND SEDIMENT FROM THE BASE OF THE SWALE WILL BE REMOVED TO A DEPTH OF 1 FOOT BELOW THE BASE AND APPROPRIATELY DISPOSED.
10. DEBRIS (i.e., BICYCLES, FURNITURE, SHOPPING CARTS, LUMBER, STICKS, BUCKETS, LEAVES, AND RUBBISH) SHALL BE REMOVED AND APPROPRIATELY DISPOSED.
11. SIDESLOPE OF SWALE SHALL MATCH EXISTING GRADE EXCEPT IN AREAS WHERE THE EXISTING GRADES DO NOT FACILITATE THE PLACEMENT OF RIPRAP. IN THESE AREAS, LIMITED EXCAVATION OF SOIL MAY BE REQUIRED.
12. CONTRACTOR WILL BE RESPONSIBLE FOR ENSURING THAT DISCHARGE WATER IS MANAGED (e.g., UPSTREAM DIVERSION STRUCTURE, BYPASS PUMPING, FLOW RE-ROUTING, WORK SEQUENCING, ETC.) DURING THE WORK ACTIVITIES.

0 10' 20'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD MASSACHUSETTS

FINAL RD/RA WORK PLAN ADDENDUM FOR FORMER OXBOW AREAS A AND C

PROPOSED DRAINAGE SWALE ACTIVITIES

BBL BLASLAND, BOUCK & LEE, INC. engineers, scientists, economists

FIGURE 1

X: 20633X01.DWG
L: ON=*, OFF=*REF
P: PAGESET/SYR-DL
9/26/05 SYR-85-DMW SDL RCB
C/20633004/FINAL/20633C03.DWG