



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

January 3, 2007

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

**Re: GE-Pittsfield/Housatonic River Site
Former Oxbow Areas A and C (GEC410)
Summary of November 2006 Inspection Activities**

Dear Mr. Tagliaferro:

On November 29, 2006, the General Electric Company (GE) performed its first post-remediation inspection of the properties within Former Oxbow Areas A and C at which remediation activities have been performed. As shown on Figure 1, Former Oxbow Areas A and C consist of four commercial parcels, two recreational parcels, and one parcel that includes both commercial and recreational portions. In accordance with GE's *Second Addendum to Final Removal Design/Removal Action Work Plan for Former Oxbow Areas A and C* (Second RD/RA Work Plan Addendum), which was submitted to EPA in April 2006, conditionally approved by EPA on May 31, 2006, and revised on June 13, 2006, GE conducted remediation activities at five of these properties – Parcels I8-23-4, I8-23-5, I8-23-6, I8-23-9, and I9-5-1. These remediation activities were completed in October 2006. In addition, vegetation restoration activities were conducted at these properties in accordance with the revised Vegetation Restoration Plan for Former Oxbow Areas A & C, provided in Attachment 1 to GE's October 5, 2006 Addendum to Supplemental Information Package.

The November 2006 inspection was performed for areas that were backfilled and restored during implementation of the remediation actions. This inspection was conducted in accordance with the Post-Removal Site Control Plan contained in Attachment E to GE's Final RD/RA Work Plan, as revised and set forth in Attachment F to the Second RD/RA Work Plan Addendum.

The November 2006 inspection consisted of visual observations of the backfilled/restored areas, focusing on the following: (a) erosion controls to verify their continued effectiveness until such time as vegetation is sufficiently established; (b) any areas where excessive settlement has occurred relative to the surrounding areas; (c) any drainage or growth problems due to possible over-compaction of backfill materials; and (d) other conditions that could jeopardize the completed remediation. The inspection also evaluated whether the vegetation that has been planted or seeded is growing as anticipated and providing the desired degree of erosion control.

To document the results of the November 2006 inspection, GE completed an Inspection Summary and Checklist for each property subject to inspection. Copies of the completed forms are provided in Attachment A. These forms will also be used in the future to continue to document such inspections and track the completion of identified maintenance activities.

In summary, the November 2006 inspection indicated that some of the inspected properties at Former Oxbow Areas A and C will require minor maintenance. Specifically, the inspection identified the need to conduct the following maintenance activities:

- Repair damage to fence on Parcel I8-23-4;
- Re-seed area with sparse vegetation along northeast corner of Parcel I8-23-4 (top of slope along Housatonic riverbank);
- Repair ruts/uneven ground between sidewalk and Elm Street and re-seed areas with sparse vegetation on Parcel I8-23-5;
- Repair erosion/sink hole along riverbank at Parcel I8-23-6 and re-seed areas on that property with sparse vegetation; and
- Replace rip-rap at base of Day Street drainage outfall on Parcel I8-23-6.

These maintenance activities will be conducted prior to the May 2007 inspection.

In accordance with the above-referenced Post-Removal Site Control Plan, the backfilled/restored areas will be inspected approximately every 6 months for a period of two years. Future inspections are anticipated to occur in May and October of 2007 and 2008. Following each inspection, an inspection report will be prepared and submitted to EPA.

In addition, GE is currently developing a Final Completion Report for the Former Oxbows A and C Removal Action. GE anticipates scheduling a pre-certification inspection with EPA and the Massachusetts Department of Environmental Protection in the first part of 2007, and will thereafter submit the Final Completion Report to EPA. That report will include a final Post-Removal Site Control Plan for this area.

Please call me if you have any comments or questions.

Sincerely

Richard Gates/EGB

Richard W. Gates
Remediation Project Manager

Attachments

V:\GE_Pittsfield_CD_Former_Oxbow_Areas_A_and_C\Reports and Presentations\Inspections\006711324Ltr.doc

cc: Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston (2 copies)
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Rod McLaren, GE*
Peter Wojcik, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter LLP
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GE Internal Repository

* cover letter only

Figure

Attachment A

Completed Inspection Forms

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I8-23-4

I. GENERAL INFORMATION

Inspection Date: 11/29/06
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 45°F
Date of Last Inspection: ---

II. INSPECTION SUMMARY

1. Soil Backfill Areas *(Note any physical changes since last inspection; note evidence of excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)*

- All areas in good condition.

2. Vegetation Area *(Note any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of stressed/sparse cover) and other landscaping items (trees, shrubs, etc.)*

- Sparse vegetation on corner of Parcels I8-23-4 and I8-23-5, along Housatonic River bank (top of slope).

3. Other Observations *(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)*

- Fence along Housatonic River bank has been damaged.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Repair section of fence indicated above.
- Scratch and seed 4' x 4' area indicated above.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I8-23-5

I. GENERAL INFORMATION

Inspection Date: 11/29/06
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 45°F
Date of Last Inspection: ---

II. INSPECTION SUMMARY

1. Soil Backfill Areas *(Note any physical changes since last inspection; note evidence of excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)*

- Three (3) islands between sidewalk and Elm Street have vehicle ruts and/or uneven ground.

2. Vegetation Area *(Note any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of stressed/sparse cover) and other landscaping items (trees, shrubs, etc.)*

- Sparse vegetation between sidewalk and Elm Street.

3. Other Observations *(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)*

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Repair ruts and/or uneven ground between sidewalk and Elm Street.

- Reseed areas with sparse vegetation.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I8-23-6

I. GENERAL INFORMATION

Inspection Date: 11/29/06
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 45°F
Date of Last Inspection: ---

II. INSPECTION SUMMARY

1. Soil Backfill Areas *(Note any physical changes since last inspection; note evidence of excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)*

- Erosion along corner of Parcels I8-23-6 and I9-5-14 along Housatonic River bank, approximately 2' from edge of rip-rap.
- Erosion/sinkhole along edge/corner of drainage swale and Housatonic River bank.

2. Vegetation Area *(Note any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of stressed/sparse cover) and other landscaping items (trees, shrubs, etc.)*

- Sparse vegetation along Housatonic River bank.

3. Other Observations *(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)*

- Erosion at base of Day Street drainage outfall (rip-rap has been scoured).

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Repair erosion/sinkholes along Housatonic River bank.
- Replace scoured rip-rap at base of Day Street drainage outfall with large sized rip-rap.
- Reseed areas with sparse vegetation.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I8-23-9

I. GENERAL INFORMATION

Inspection Date: 11/29/06
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 45°F
Date of Last Inspection: ---

II. INSPECTION SUMMARY

1. Soil Backfill Areas *(Note any physical changes since last inspection; note evidence of excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)*

- Good condition.

2. Vegetation Area *(Note any physical changes since last inspection; 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.

3. Other Observations *(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)*

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I9-5-1

I. GENERAL INFORMATION

Inspection Date: 11/29/06
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 45°F
Date of Last Inspection: ---

II. INSPECTION SUMMARY

1. Soil Backfill Areas *(Note any physical changes since last inspection; note evidence of excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)*

- All areas in good condition.

2. Vegetation Area *(Note any physical changes since last inspection; 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.

3. Other Observations *(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)*

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE