



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

July 11, 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 May 2007 Inspection Activities**

Dear Mr. Tagliaferro:

On May 29, 2007, the General Electric Company (GE) performed its second 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 the U.S. Environmental Protection Agency (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.

GE conducted the initial post-remediation inspection of these properties on November 29, 2006. A summary of the November 2006 inspection activities was submitted to EPA in a letter dated January 3, 2007. On May 29, 2007, GE conducted the second post-remediation inspection of these properties 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. Consistent with the initial inspection, this inspection was performed for areas that were backfilled and restored during implementation of the remediation actions.

Summary of Inspection Activities

The May 2007 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.

The May 2007 inspection also included observations of properties/areas at which the need for follow-up activities had been identified during the prior inspection. As indicated in GE's January 3, 2007 report related to the November 2006 inspection, follow-up activities included: repairing damage to the fence on Parcel I8-23-4; re-seeding the area with sparse vegetation along the northeast corner of Parcel I8-23-4 (i.e., the top of the slope along the Housatonic riverbank); and replacing rip-rap at the base of the Day Street drainage outfall on Parcel I8-23-6. In addition, GE observed ruts/uneven ground between the sidewalk and Elm Street on Parcel I8-23-5 and erosion along the riverbank at Parcel I8-23-6 which required repair and re-seeding. Since that time, all of these activities have been addressed. The rip-rap at the base of the Day Street drainage outfall was previously replaced but the rip-rap continues to wash away. Upon further evaluation, since the drainage outfall is lined with concrete, no further actions will be performed.

To document the results of the May 2007 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.

Summary of Observations During Inspection

In summary, the May 2007 inspection indicated that some of the inspected properties at Former Oxbow Areas A and C will require minor maintenance. In addition to the outstanding items previously identified in the January 3, 2007 report (status mentioned above), the May 2007 inspection identified the need to conduct the following maintenance activities:

- Replace 2 dead riverbank maples and monitor one stressed riverbank maple on Parcel I8-23-4; and
- Replace the dead hemlock on Parcel I8-23-6.

Since that time, the hemlock has been replaced. Pending maintenance activities will be conducted prior to the fall 2007 inspection.

Schedule for Future Inspections

In accordance with Technical Attachment J to the SOW, the backfilled/restored areas are to be inspected approximately every 6 months for a period of one year and annually thereafter (subject to EPA approval of a different frequency). Future inspections are anticipated to occur in the fall of each year. 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 summer 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

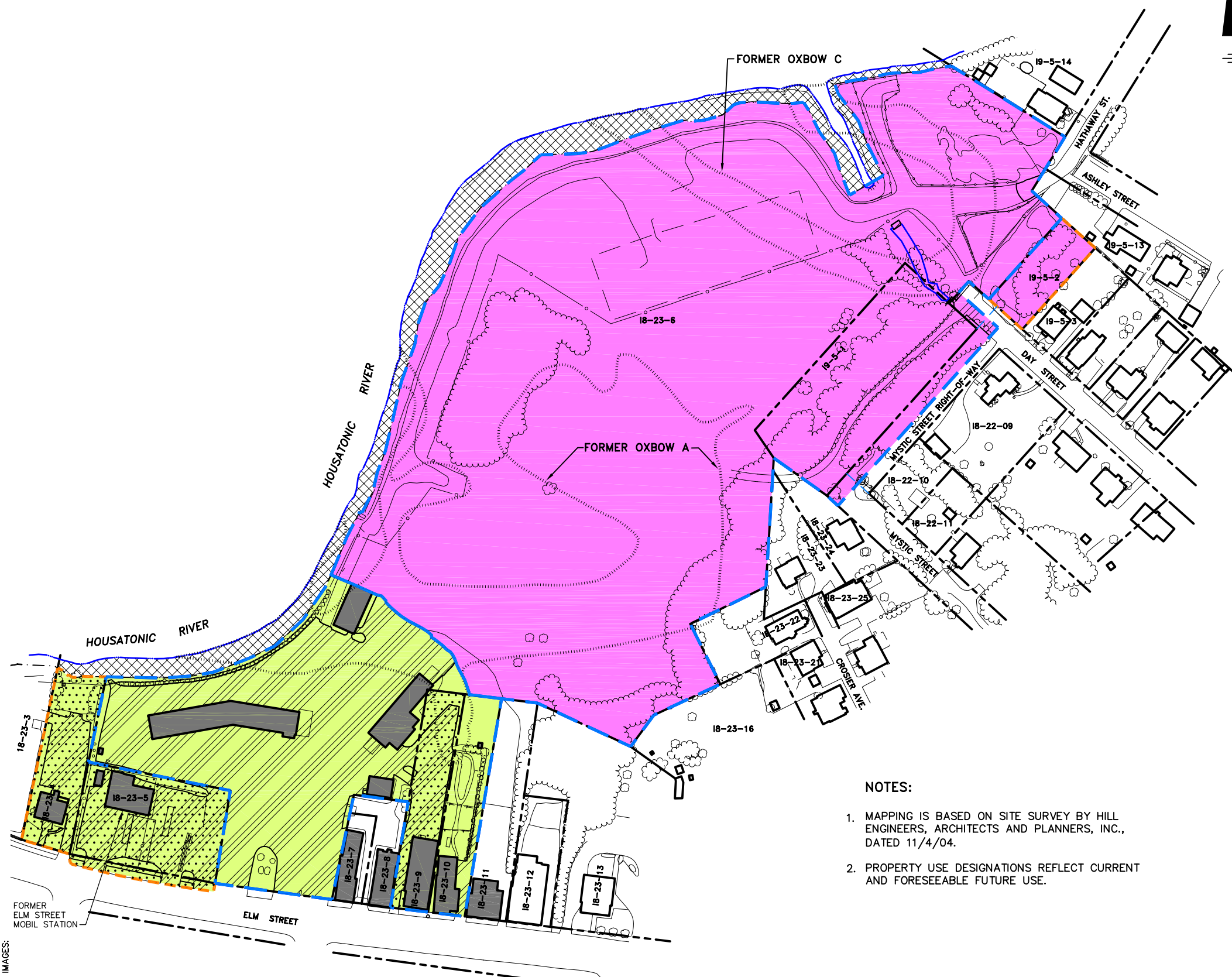
cc: Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston (2 copies)
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Nancy E. Harper, MA AG*
Dale Young, MA EOEAA*
Mayor James Ruberto, City of Pittsfield*

Michael Carroll, GE*
Rod McLaren, GE*
Peter Wojcik, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter LLP
Property Owner – Parcel I8-23-4
Property Owner – Parcel I8-23-5
Property Owner – Parcels I8-23-6 & I9-5-1
Property Owner – Parcel I8-23-9
Public Information Repositories
GE Internal Repository











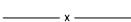


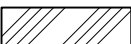




** cover letter only*

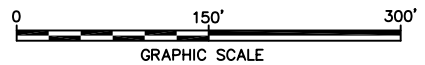
Figure

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 PROJECTNAME: 20919001
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LEGEND:

-  APPROXIMATE ORIGINAL REMOVAL ACTION AREA BOUNDARY
-  AVERAGING AREA BOUNDARY
-  MODIFIED REMOVAL ACTION AREA BOUNDARY (PROPERTIES 18-23-4 AND 18-23-5 ADDED TO THE RAA FOR THE PURPOSE OF ADDRESSING PCBS ONLY)
-  FORMER FILTRATION FACILITY
-  PROPERTY BOUNDARY
-  18-23-6 PROPERTY ID
-  EDGE OF WATER
-  VEGETATION
-  FORMER OXBOW/LOW LYING AREA
-  WOODEN FENCE
-  WIRE FENCE
-  CHAIN LINK FENCE
-  GUARDRAIL
-  PAVED AREA
-  RECREATIONAL PROPERTY (NON-GE OWNED)
-  COMMERCIAL/INDUSTRIAL PROPERTY (NON-GE OWNED)
-  COMMERCIAL/INDUSTRIAL PROPERTY (NON-GE OWNED) EVALUATED UNDER RESIDENTIAL SCENARIO
-  AREA INCLUDED AS PART OF 1 1/2-MILE REACH REMOVAL ACTION



NOTES:

1. MAPPING IS BASED ON SITE SURVEY BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, INC., DATED 11/4/04.
2. PROPERTY USE DESIGNATIONS REFLECT CURRENT AND FORESEEABLE FUTURE USE.

GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS MAY 2007 INSPECTION	
SITE PLAN	
 <small>infrastructure, environment, facilities</small>	FIGURE 1

Attachment A

Inspection Summary and
Checklist

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I8-23-4

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/29/2006

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.)
- Two riverbank maples (small diameter) are dead.
 - One riverbank maple is stressed.
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.)
- Repair chain-link fence.
 - Sparse areas have been reseeded.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Repair chain-link fence.
- Replace two dead riverbank maples.
- Monitor one stressed riverbank maple.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL 18-23-5

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/29/2006

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.)*
 - Ruts/uneven ground in islands between sidewalk and Elm Street.

- 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.))*
 - Stressed/sparse cover on islands 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/uneven ground and re-seed islands between sidewalk and Elm Street.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I8-23-6

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/29/2006

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/sinkhole at northern tip of Parcel I8-23-6, top of riverbank.

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.)
 - One dead hemlock.

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.)
 - Eroded rip-rap at Day Street drainage culvert outfall observed. Rip-rap was previously replaced but washed away.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Repair erosion/sinkhole at northern tip of Parcel I8-23-6.
- Replace dead hemlock.
- Repair eroded rip-rap at base of Day Street drainage culvert outfall with larger-sized rip-rap.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I8-23-9

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/29/2006

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

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I9-5-1

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/29/2006

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