



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

November 21, 2007

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

**Re: GE-Pittsfield/Housatonic River Site
Former Oxbow Areas A and C (GECD410)
Summary of October 2007 Inspection Activities**

Dear Mr. Fisher:

On October 24, 2007, the General Electric Company (GE) performed post-remediation inspections of the properties within Former Oxbow Areas A and C at which remediation activities have been performed. In accordance with GE's approved *Second Addendum to Final Removal Design/Removal Action Work Plan for Former Oxbow Areas A and C* (Second RD/RA Work Plan Addendum), 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 (Figure 1), completing those actions 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.

Previous post-remediation inspections were performed in November 2006 and May 2007. Inspections were 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. 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 October 2007 inspection consisted of 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 October 2007 inspection also included observations of properties/areas where the need for follow-up activities had been identified during the prior inspection. The results of the October 2007 inspection are included in an Inspection Summary and Checklist for each property subject to inspection (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

The October 2007 inspection indicated that one of the inspected properties at Former Oxbow Areas A and C will require minor maintenance. As indicated on the forms in Attachment A, the October 2007 inspection identified the need to replace three maples and one cottonwood on Parcel I8-23-4. These trees will be planted prior to the fall 2008 inspection.

The May 2007 inspection identified follow-up activities including: monitoring one stressed riverbank maple and replacing two riverbank maples on Parcel I8-23-4; repairing damage to the fence on Parcel I8-23-4 (completed July 2007); replacing the dead hemlock on Parcel I8-23-6 (completed June 2007); replacing ruts/uneven ground between the sidewalk and Elm Street on Parcel I8-23-5 (completed June 2007); and repairing the erosion/sinkhole on Parcel I8-23-6 (completed by EPA). The two riverbank maples on Parcel I8-23-4 identified as needing replacement during the May 2007 inspection are anticipated to be planted in November 2007.

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 prior to submitting 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 W. Gates
Remediation Project Manager

Attachments

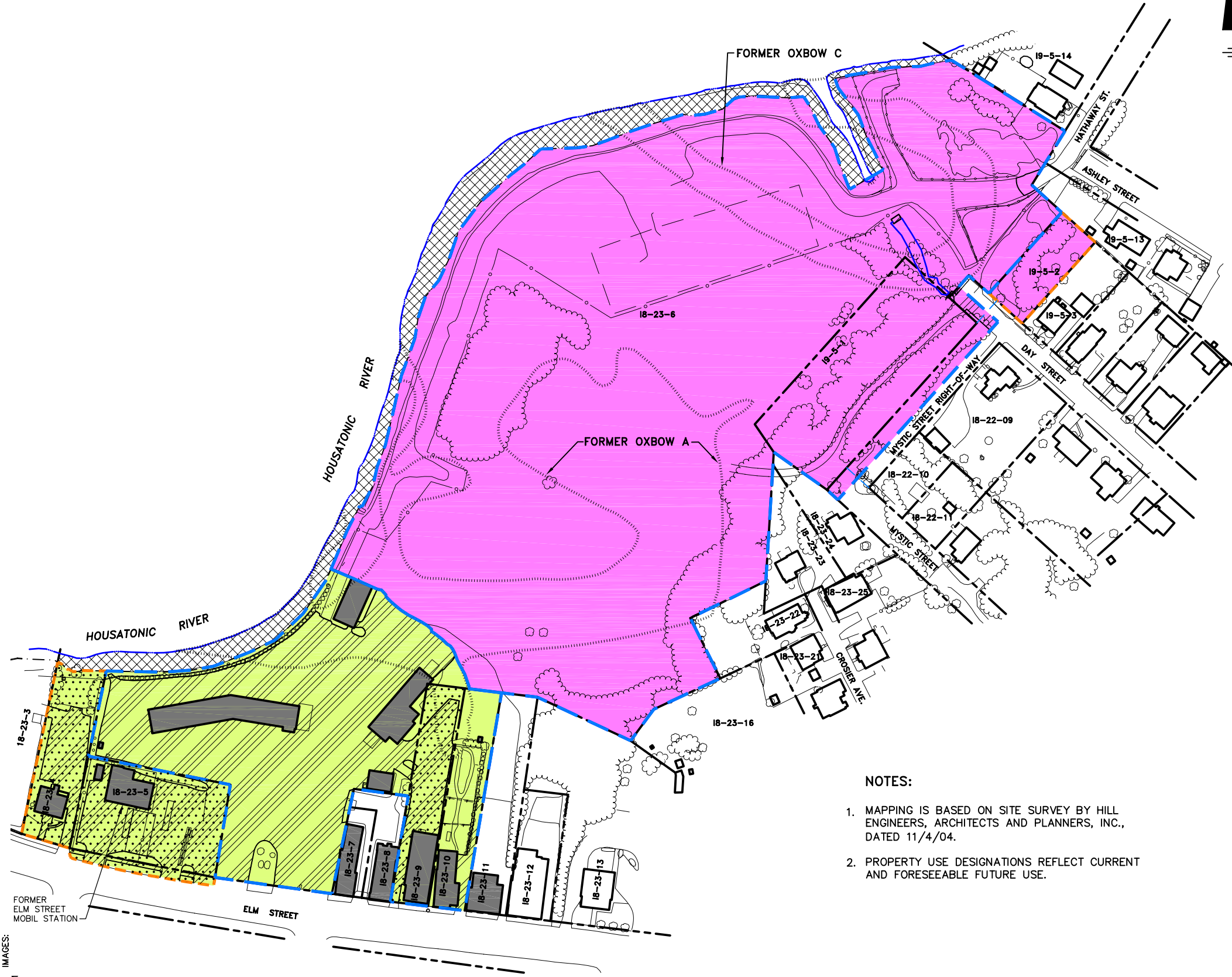
cc: Dean Tagliaferro, EPA
Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston (2 copies)
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Nancy E. Harper, MA AG*
Dale Young, MA EOEAA*
Mayor James Ruberto, City of Pittsfield*

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

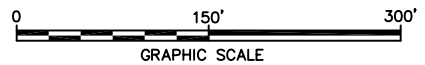
Figure

SYR-85-DWY LAF LAYER: ON=* OFF=*REF*
 G:\CAD\GE-CAD\GE_ACTIVE\N\30919003\INSPECT\OXBOW\OCT2007\30919001.DWG
 PENTABLE:PLTFULL.CTB PRINTED:11/7/2007 1:35 PM BY:LFORAKER
 LAYOUT:1 PAGESETUP:BL-PDF
 SAVER:11/7/2007 1:34 PM
 PROJECTNAME: 30919001
 XREFS: IMAGES:



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
OCTOBER 2007 INSPECTION

SITE PLAN

ARCADIS BBL
 infrastructure, environment, facilities

FIGURE
1

Attachment A

Completed Inspection Forms

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I8-23-4

I. GENERAL INFORMATION

Inspection Date: 10/24/07
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 60°F
Date of Last Inspection: 5/29/07

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.)*

- Three riverbank maples (small diameter) are dead.

- One cottonwood is dead.

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.)*

- Damage to chainlink fence has been repaired.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Replace three dead maples and one dead cottonwood.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I8-23-5

I. GENERAL INFORMATION

Inspection Date: 10/24/07
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 60°F
Date of Last Inspection: 5/29/07

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.)*

- Ruts/uneven ground between sidewalk and Elm Street have been repaired.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I8-23-6

I. GENERAL INFORMATION

Inspection Date: 10/24/07
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 60°F
Date of Last Inspection: 5/29/07

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.)*

- As discussed in the July 11, 2007 letter, the area lined with rip-rap within the Day Street drainage outfall is lined with concrete, therefore no further actions are anticipated to be performed.

- Erosion/sinkhole on Parcel I8-23-6 has been repaired.

- Dead hemlock was replaced.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS A AND C

PARCEL I8-23-9

I. GENERAL INFORMATION

Inspection Date: 10/24/07
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 60°F
Date of Last Inspection: 5/29/07

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: 10/24/07
Conducted By: Paolo Filippetti
Weather Conditions: Cloudy - 60°F
Date of Last Inspection: 5/29/07

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