



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

December 21, 2007

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

Ms. Susan Steenstrup
DEP Project Coordinator
Bureau of Waste Site Cleanup
Department of Environmental Protection
436 Dwight Street
Springfield, MA 01103

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

Dear Mr. Fisher and Ms. Steenstrup:

On November 28, 2007, the General Electric Company (GE) completed the first annual review and inspection of properties located within Former Oxbow Areas A and C, at which Conditional Solutions have been implemented under the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site. Those properties are Parcels I8-23-6, I9-5-1, and I9-5-2 (which are commonly owned) and Parcel I8-23-10. GE sent letters to the owners of these properties on June 21, 2007, notifying them of the implementation of Conditional Solutions at their properties. For such non-GE-owned properties at which a Conditional Solution has been implemented, the CD requires certain annual post-remediation review and inspection activities.

Once a Final Completion Report for Former Oxbow Areas A and C Removal Action has been finalized, it will establish requirements for the performance of the annual post-remediation review and inspection activities at the properties with Conditional Solutions. In the meantime, for purposes of the 2007 inspections, GE followed the procedures outlined in Paragraphs 36 and 38 and Appendix Q of the CD and GE's *Final Removal Design/Removal Action Work Plan for Former Oxbow Areas A and C* (Final Work Plan; July 2005), with the modifications on which GE and EPA have agreed for such inspections at other areas subject to the CD.

As part of these activities, GE reviewed the most recent property records from the Pittsfield Tax Assessor's Office, as well as the deed records at the Berkshire Middle District Registry of Deeds and determined there has not been a change in ownership of any of the parcels subject to a Conditional Solution. In addition, GE reviewed the Final Work Plan, which describes the Conditional Solutions, as well as the attached technical drawing (Attachment A), which depicts the post-remediation site features and topography that were determined after an agreement with the property owner of Parcel I8-23-6 to remove the soil piles on that property, as discussed with EPA.

GE also conducted a visual site inspection of each property (to the extent possible given any access limitations) to evaluate whether any of the following have occurred since completion of the remediation activities and implementation of the Conditional Solutions:

- 1) Any change in activities or uses of the property that would be potentially inconsistent with the land use for which the Conditional Solution was implemented;
- 2) Installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil;
- 3) Any excavations, construction, or other activities or conditions that resulted in the disturbance of ten (10) cubic yards of soil or greater, regardless of depth; and
- 4) If any of the activities described in # 2 or # 3 above are noted, any reduction of the surface grade, compared to that shown in the attached technical drawing (or any more up-to-date map, if available).

The results of the November 2007 inspection were documented in an Annual Inspection Checklist for each property. Copies of the completed forms are attached. As documented in these forms, the property record reviews indicated that there has been no change in ownership of any of the properties involved and the inspection showed no visual evidence of any of the above-listed activities or conditions at these properties since the implementation of the Conditional Solutions. (Since the date of the inspection, two monitoring wells were installed on Parcel I8-23-6. However, installation of the wells did not change the surface grade at this property.)

As required by the CD, these properties will be inspected annually. Following each inspection, an inspection report will be prepared and submitted to EPA and MDEP.

Please call me if you have any comments or questions.

Sincerely

Richard Gates / EGB

Richard Gates
Remediation Project Manager

Attachments

G:\GE\GE_Pittsfield_CD_Former_Oxbow_Areas_A_and_C\Reports and Presentations\Inspections\601711324Ltr.doc

cc: Dean Tagliaferro, EPA	Michael Carroll, GE*
Tim Conway, EPA	Rod McLaren, GE*
Holly Inglis, EPA	Peter Wojcik, GE*
Rose Howell, EPA*	James Nuss, ARCADIS BBL
Linda Palmieri, Weston (2 copies)	James Bieke, Goodwin Procter LLP
K.C. Mitkevicius, USACE	Property Owners – Above-Listed Parcels
Anna Symington, MDEP*	Public Information Repositories
Jane Rothchild, MDEP*	GE Internal Repository
Nancy E. Harper, MA AG*	
Mayor James Ruberto, City of Pittsfield*	<i>* cover letter only</i>

CONDITIONAL SOLUTION ANNUAL INSPECTION CHECK LIST FOR OXBOW AREAS A AND C

PARCEL NUMBER 18-23-6

DOCUMENT REVIEW

Conducted By: Elizabeth Bremer, ARCADIS BBL
Representing: GE

Phone Number: (315) 671-9444
Review Start Date: 11/20/2007

1. Check here to confirm that the description of the Conditional Solution in the Final Removal Design/Removal Action Work Plan, attached technical drawing showing remediation as implemented (and any alternative plan proposed by GE for the comparison described in Item 5 on next page), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree have been reviewed.
2. Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office for this property have been reviewed.
3. Has there been a change in ownership of this property?
 No
 Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

4. Review Completed Date: 11/20/2007

VISUAL SITE INSPECTION

Conducted By: Greg Rabasco, ARCADIS BBL
Representing: GE

Phone Number: (413) 822-1184
Inspection Start Date: 11/28/2007

1. List other individuals and their company/agency that were present during the visual site inspection.
None

2. Is there any visual evidence of changes in activities and uses of the property since the last inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented (e.g., commercial or recreational, as appropriate)?
 No
 Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last inspection?
 No
 Yes - If yes, describe below and show the location(s) of such activity on a plan.

CONDITIONAL SOLUTION ANNUAL INSPECTION CHECK LIST FOR OXBOW AREAS A AND C

4. Is there any visual evidence of excavations, construction, or other activities or conditions that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. If any of the conditions listed in the responses to Questions 3 and 4 appears to have altered the surface grade of the property compared to the surface grade shown on the attached technical drawing showing remediation as implemented (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade in the above-listed drawings and/or plan.

6. Inspection Completed Date: 11/28/2007

CONDITIONAL SOLUTION ANNUAL INSPECTION CHECK LIST FOR OXBOW AREAS A AND C

PARCEL NUMBER 18-23-10

DOCUMENT REVIEW

Conducted By: Elizabeth Bremer, ARCADIS BBL Phone Number: (315) 671-9444
Representing: GE Review Start Date: 11/20/2007

1. Check here to confirm that the description of the Conditional Solution in the Final Removal Design/Removal Action Work Plan, attached technical drawing showing remediation as implemented (and any alternative plan proposed by GE for the comparison described in Item 5 on next page), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree have been reviewed.

2. Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office for this property have been reviewed.

3. Has there been a change in ownership of this property?
 No
 Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

4. Review Completed Date: 11/20/2007

VISUAL SITE INSPECTION

Conducted By: Greg Rabasco, ARCADIS BBL Phone Number: (413) 822-1184
Representing: GE Inspection Start Date: 11/28/2007

1. List other individuals and their company/agency that were present during the visual site inspection.
None

2. Is there any visual evidence of changes in activities and uses of the property since the last inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented (i.e., commercial/industrial use)?
 No
 Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last inspection?
 No
 Yes - If yes, describe below and show the location(s) of such activity on a plan.

CONDITIONAL SOLUTION ANNUAL INSPECTION CHECK LIST FOR OXBOW AREAS A AND C

4. Is there any visual evidence of excavations, construction, or other activities or conditions that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. If any of the conditions listed in the responses to Questions 3 and 4 appears to have altered the surface grade of the property compared to the surface grade shown on the attached technical drawing showing remediation as implemented (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade in the above-listed drawings and/or plan.

6. Inspection Completed Date: 11/28/2007

CONDITIONAL SOLUTION ANNUAL INSPECTION CHECK LIST FOR OXBOW AREAS A AND C

PARCEL NUMBER I9-5-1

DOCUMENT REVIEW

Conducted By: Elizabeth Bremer, ARCADIS BBL
Representing: GE

Phone Number: (315) 671-9444
Review Start Date: 11/20/2007

- Check here to confirm that the description of the Conditional Solution in the Final Removal Design/Removal Action Work Plan, attached technical drawing showing remediation as implemented (and any alternative plan proposed by GE for the comparison described in Item 5 on next page), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree have been reviewed.
- Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office for this property have been reviewed.
- Has there been a change in ownership of this property?
 No
 Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

- Review Completed Date: 11/20/2007

VISUAL SITE INSPECTION

Conducted By: Greg Rabasco, ARCADIS BBL
Representing: GE

Phone Number: (413) 822-1184
Inspection Start Date: 11/28/2007

- List other individuals and their company/agency that were present during the visual site inspection.
None

- Is there any visual evidence of changes in activities and uses of the property since the last inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented (i.e., recreational use)?
 No
 Yes - If yes, describe below.

- Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last inspection?
 No
 Yes - If yes, describe below and show the location(s) of such activity on a plan.

CONDITIONAL SOLUTION ANNUAL INSPECTION CHECK LIST FOR OXBOW AREAS A AND C

4. Is there any visual evidence of excavations, construction, or other activities or conditions that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. If any of the conditions listed in the responses to Questions 3 and 4 appears to have altered the surface grade of the property compared to the surface grade shown on the attached technical drawing showing remediation as implemented (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade in the above-listed drawings and/or plan.

6. Inspection Completed Date: 11/28/2007

CONDITIONAL SOLUTION ANNUAL INSPECTION CHECK LIST FOR OXBOW AREAS A AND C

PARCEL NUMBER I9-5-2

DOCUMENT REVIEW

Conducted By: Elizabeth Bremer, ARCADIS BBL Phone Number: (315) 671-9444
Representing: GE Review Start Date: 11/20/2007

1. Check here to confirm that the description of the Conditional Solution in the Final Removal Design/Removal Action Work Plan, attached technical drawing showing remediation as implemented (and any alternative plan proposed by GE for the comparison described in Item 5 on next page), and any subsequent work plan(s) approved and implemented pursuant to Paragraph 35 of the Consent Decree have been reviewed.

2. Check here to confirm that the most recent property records from the Pittsfield Tax Assessor's Office for this property have been reviewed.

3. Has there been a change in ownership of this property?
 No
 Yes - If yes, list the new owner's name and mailing address below and indicate whether a notice of the Conditional Solution has been or will be sent to the new owner.

4. Review Completed Date: 11/20/2007

VISUAL SITE INSPECTION

Conducted By: Greg Rabasco, ARCADIS BBL Phone Number: (413) 822-1184
Representing: GE Inspection Start Date: 11/28/2007

1. List other individuals and their company/agency that were present during the visual site inspection.
 None

2. Is there any visual evidence of changes in activities and uses of the property since the last inspection that are potentially inconsistent with the land use for which the Conditional Solution was implemented (i.e., recreational use)?
 No
 Yes - If yes, describe below.

3. Is there any visual evidence of installation of a new utility or repair or replacement of an existing utility that involved disturbance of soil within the property since the last inspection?
 No
 Yes - If yes, describe below and show the location(s) of such activity on a plan.

CONDITIONAL SOLUTION ANNUAL INSPECTION CHECK LIST FOR OXBOW AREAS A AND C

4. Is there any visual evidence of excavations, construction, or other activities or conditions that resulted in the disturbance of 10 cubic yards of soil or greater, regardless of depth, within the property?

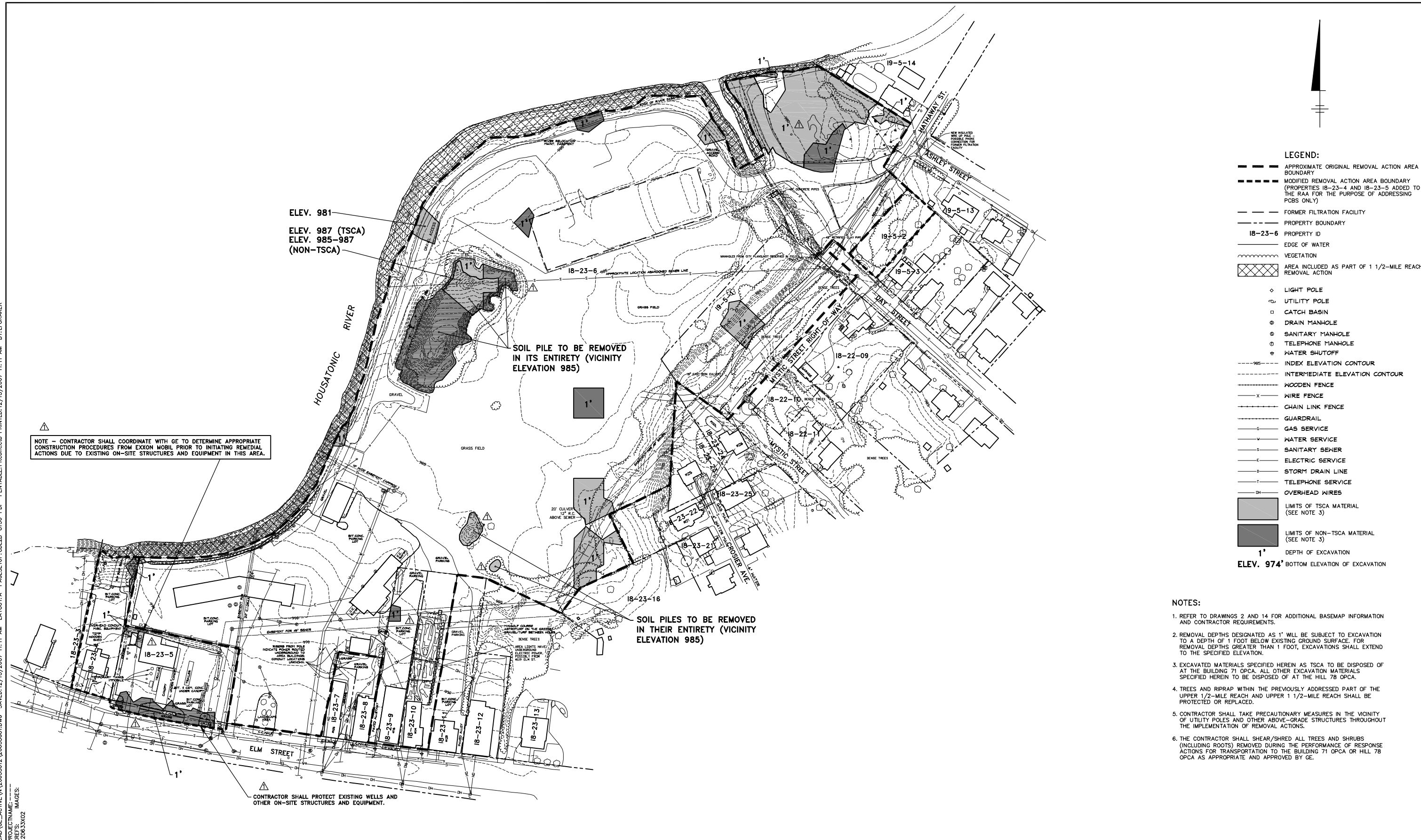
No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

5. If any of the conditions listed in the responses to Questions 3 and 4 appears to have altered the surface grade of the property compared to the surface grade shown on the attached technical drawing showing remediation as implemented (or an alternative, more recent plan proposed by GE), identify the approximate area/location(s) of such grade change on a plan and compare the new surface grade in such area(s) to the surface grade in the above-listed drawings and/or plan.

6. Inspection Completed Date: 11/28/2007

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LEGEND:

	APPROXIMATE ORIGINAL REMOVAL ACTION 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
	AREA INCLUDED AS PART OF 1 1/2-MILE REACH REMOVAL ACTION
	LIGHT POLE
	UTILITY POLE
	CATCH BASIN
	DRAIN MANHOLE
	SANITARY MANHOLE
	TELEPHONE MANHOLE
	WATER SHUTOFF
	INDEX ELEVATION CONTOUR
	INTERMEDIATE ELEVATION CONTOUR
	WOODEN FENCE
	WIRE FENCE
	CHAIN LINK FENCE
	GUARDRAIL
	GAS SERVICE
	WATER SERVICE
	SANITARY SEWER
	ELECTRIC SERVICE
	STORM DRAIN LINE
	TELEPHONE SERVICE
	OVERHEAD WIRES
	LIMITS OF TSCA MATERIAL (SEE NOTE 3)
	LIMITS OF NON-TSCA MATERIAL (SEE NOTE 3)
1'	DEPTH OF EXCAVATION
ELEV. 974'	BOTTOM ELEVATION OF EXCAVATION

NOTE - CONTRACTOR SHALL COORDINATE WITH GE TO DETERMINE APPROPRIATE CONSTRUCTION PROCEDURES FROM EXXON MOBIL PRIOR TO INITIATING REMEDIAL ACTIONS DUE TO EXISTING ON-SITE STRUCTURES AND EQUIPMENT IN THIS AREA.

SOIL PILE TO BE REMOVED IN ITS ENTIRETY (VICINITY ELEVATION 985)

SOIL PILES TO BE REMOVED IN THEIR ENTIRETY (VICINITY ELEVATION 985)

CONTRACTOR SHALL PROTECT EXISTING WELLS AND OTHER ON-SITE STRUCTURES AND EQUIPMENT.

- NOTES:**
- REFER TO DRAWINGS 2 AND 14 FOR ADDITIONAL BASEMAP INFORMATION AND CONTRACTOR REQUIREMENTS.
 - REMOVAL DEPTHS DESIGNATED AS 1' WILL BE SUBJECT TO EXCAVATION TO A DEPTH OF 1 FOOT BELOW EXISTING GROUND SURFACE. FOR REMOVAL DEPTHS GREATER THAN 1 FOOT, EXCAVATIONS SHALL EXTEND TO THE SPECIFIED ELEVATION.
 - EXCAVATED MATERIALS SPECIFIED HEREIN AS TSCA TO BE DISPOSED OF AT THE BUILDING 71 OPCA. ALL OTHER EXCAVATION MATERIALS SPECIFIED HEREIN TO BE DISPOSED OF AT THE HILL 78 OPCA.
 - TREES AND RIPRAP WITHIN THE PREVIOUSLY ADDRESSED PART OF THE UPPER 1/2-MILE REACH AND UPPER 1/2-MILE REACH SHALL BE PROTECTED OR REPLACED.
 - CONTRACTOR SHALL TAKE PRECAUTIONARY MEASURES IN THE VICINITY OF UTILITY POLES AND OTHER ABOVE-GRADE STRUCTURES THROUGHOUT THE IMPLEMENTATION OF REMOVAL ACTIONS.
 - THE CONTRACTOR SHALL SHEAR/SHRUD ALL TREES AND SHRUBS (INCLUDING ROOTS) REMOVED DURING THE PERFORMANCE OF RESPONSE ACTIONS FOR TRANSPORTATION TO THE BUILDING 71 OPCA OR HILL 78 OPCA AS APPROPRIATE AND APPROVED BY GE.

ORIGINAL SCALE APPLIES TO 22"x34" DRAWING

1" = 75'

75' 0 75' 150'

THIS DRAWING WAS PREPARED AT THE SCALE(S) INDICATED. INACCURACIES IN THE STATED SCALE(S) MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED.

USE THE GRAPHIC SCALE BAR(S) TO DETERMINE THE ACTUAL SCALE(S) OF THIS DRAWING.

No.	Date	Revisions	Init
1	7/26/06	Revised excavation limits at parcels 18-23-5, 18-23-6, and 18-23-9. Added contractor call-outs.	KLB

Professional Engineer's Name	
Professional Engineer's No.	
State	Date Signed
Project Mgr.	Designed by
KLB	DMW

ARCADIS BBL
 infrastructure, environment, facilities

GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS
 LYMAN STREET AREA/FORMER OXBOW AREAS A AND C/FORMER OXBOW AREAS J AND K REMEDIAL ACTION

**EXCAVATION LIMITS
 FORMER OXBOW AREAS A AND C**

TECHNICAL DRAWINGS

ARCADIS Project No. 206.91	ATTACHMENT A
Date APRIL 2006	
ARCADIS of New York, Inc. 6723 Townpath Road P.O. Box 66 Syracuse, N.Y. 13214-0066 315.446.9120	