



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted via Overnight Courier*

June 27, 2008

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

**Re: GE-Pittsfield/Housatonic River Site  
Former Oxbow Areas A and C (GECD410)  
Summary of May 2008 Vegetation Inspection Activities**

Dear Mr. Hull:

On May 29, 2008, the General Electric Company (GE) performed a post-remediation inspection of the vegetation planted as part of restoration activities at the properties within the Former Oxbow Areas A and C Removal Action Area (RAA) at which remediation was performed. At Former Oxbow Areas A and C (shown on Figure 1), GE conducted remediation activities at five properties – Parcels I8-23-4, I8-23-5, I8-23-6, I8-23-9, and I9-5-1 – completing those actions in October 2006. Vegetation restoration activities were conducted at these properties in accordance with the Revised Vegetation Restoration Plan for Former Oxbow Areas A and C, provided in Attachment 1 to GE's October 5, 2006 Addendum to Supplemental Information Package for this and other RAAs. These activities included the planting of trees on two properties – Parcels I8-23-4 and I8-23-6.

GE has previously conducted post-remediation inspections of these properties in November 2006, May 2007, and October 2007. Summaries of these inspection activities were submitted to the U.S. Environmental Protection Agency (EPA) in letters dated January 3, 2007, July 11, 2007, and November 21, 2007 respectively. Inspections were conducted in accordance with the Post-Removal Site Control Plan contained in Attachment E to GE's Final Removal Design/Removal Action (RD/RA) Work Plan for Former Oxbow Areas A and C, as revised and set forth in Attachment F to GE's April 2006 Second Addendum to that RD/RA Work Plan.

The May 2008 inspection was performed for areas where vegetation was planted during the implementation of the remediation and restoration actions and was carried out in accordance with the Post-Removal Site Control Plan contained in Section 7.2 of GE's Final Completion Report for the Former Oxbow Areas A and C Removal Action (Final Completion Report), which was submitted to EPA on May 12, 2008 and approved by EPA on June 3, 2008. As provided in that plan, this inspection was limited to the plantings in revegetated areas; other aspects of the backfilled/restored areas are subject to annual inspection to be performed in August or September.

### **Summary of Inspection Activities**

The May 2008 inspection consisted of visual observations of the grass/herbaceous covers to assess the condition of the vegetation, including any evidence of stressed or sparse cover, and to ensure that the vegetation is growing as anticipated. The May 2008 inspection also included observations of the trees

planted on Parcels I8-23-4 and I8-23-6 as part of restoration activities to ensure that they are in good general health. Figure 4 from the Final Completion Report (copy attached) contains the restoration planting plan for the trees that were planted as part of restoration activities. Observations at these properties included a stem count of planted and newly established trees (quantity per species per parcel) in good health and a stem count of trees that were dead or dying or showing evidence of stress, if any, within each property. The results of these observations were used to evaluate if trees are surviving at a frequency of 100% of the planted quantity specified on Figure 4. Additionally, each tree observed was measured to determine the average height and range of heights of each species of tree within each property. In conjunction with the tree observations, GE inspected tree cages, tree guards, and tree stakes (where present) to ensure that these items were functioning to protect the trees from damage.

The May 2008 inspection also included observations of properties/areas at which the need for follow-up activities had been identified during the prior inspection, conducted in October 2007. Those activities included replanting three maples and one cottonwood tree on Parcel I8-23-4; this replanting was conducted in November 2007.

The results of the May 2008 inspection are included in an Inspection Summary and Checklist for each property subject to inspection. These forms were included in the Final Completion Report and will continue to be used in the future to document the periodic inspections and track the completion of identified maintenance activities. The completed inspection forms are provided in Attachment A. Documentation of tree observations is provided in tables in Attachment B. These tables list, for each species at each parcel at which trees were planted, the number of trees observed, the height of each individual tree counted, the condition of each tree counted, and the condition of the associated tree guard, cage, or stakes (where present).

**Summary of Observations During Inspection**

As indicated on the attached forms, the May 2008 inspection showed that the herbaceous vegetative cover at each property inspected was in good condition. It also showed that most of the trees planted were in good condition. The results of the tree counting, measuring, and observation activities at the two parcels where trees were planted are summarized in the following table:

Tree Count Results								
Parcel	Species	Quantity per Planting Plan <sup>1</sup>	Observed in Good Health	Observed Dead/Stressed <sup>2</sup>	Avg Height (ft.)	Range of Heights (ft.)	Percent in Good Health (%) <sup>3</sup>	Percent Survival (%) <sup>4</sup>
I8-23-4	American Elm	1	1	0	6	--	100	100
	Eastern Cottonwood	3	3	0	8.3	5-10	100	100
	Red Maple	3	3	0	6	6-6	100	100
I8-23-6	Eastern Hemlock	38	45	1/0	8.2	7-10	>100	>100
	Norway Spruce	14	12	0/2	12	10-14	86	100

Notes:

1. The quantity of each species listed corresponds to the quantity identified on Figure 4 from the Final Completion Report.
2. This column lists the number of dead trees observed and then the number of trees that were not dead but were stressed.
3. This column shows the percentage of trees that were in good condition relative to the quantity specified on Figure 4.
4. This column shows the percentage of trees that were alive (including stressed plants) relative to the quantity specified on Figure 4.

Note that, in the above table, the quantity of eastern hemlocks at Parcel I8-23-6 is higher than the quantity specified in the planting plan and shown on Figure 4. That is because, in accordance with discussions with EPA and the adjacent property owner, eight additional eastern hemlocks (beyond those specified in the planting plan) were planted to further provide privacy for that property. In this case, the percentage of trees in good health and the percentage surviving are greater than 100% relative to the quantity specified on Figure 4.

The results of the tree observations indicated that the trees planted were in good health with the exception of three trees at Parcel I8-23-6: one dead eastern hemlock, one Norway spruce which was observed to be leaning, and one other stressed Norway spruce. In addition, as shown on the tables in Attachment B, the observations of the tree guards, cages, and stakes (where present) indicated that the tree guards/cages for the red maples on Parcel I8-23-4 were in good condition, but that the tree cages for the eastern cottonwoods and American elm tree on Parcel I8-23-4 need repair. (The trees on Parcel I8-23-6 do not have such guards, cages, or stakes.)

### **Maintenance/Replanting Activities**

Based on the May 2008 inspection, GE identified the following maintenance/replanting activities:

- Repair tree cages on three eastern cottonwood trees and one American elm tree on Parcel I8-23-4;
- Replace the dead eastern hemlock on Parcel I8-23-6 (although not required since the percent of eastern hemlocks surviving is greater than 100% of the quantity specified on the planting plan);
- Straighten the leaning Norway spruce on Parcel I8-23-6 and replant the roots;
- Monitor the other stressed Norway spruce on Parcel I8-23-6; and
- Repair the erosion/sinkholes observed along the top of the riverbank on Parcel I8-23-6.

GE planted the eastern hemlock and straightened the Norway spruce during the first part of June 2008. Repair of the erosion/sinkholes and tree cages will be completed prior to the next inspection in August/September 2008.

### **Schedule for Future Inspections**

In accordance with the Post-Removal Site Control Plan included in the Final Completion Report, future inspections of the backfilled/restored areas will be performed annually (subject to EPA approval of a different frequency), with the next inspection scheduled for August or September 2008. GE is also required to inspect the plantings in all revegetated areas two times per year (in May and August or September) for a two-year period after planting. For the plantings on Parcel I8-23-6, the two-year monitoring period began in May 2007 and will be completed in August/September 2008, except that the two hemlocks replanted in 2007 and the one hemlock replanted in June 2008 will also be inspected in May and August/September 2009. (GE does not believe that the hemlock replanted in June 2008 needs to be inspected in May 2010 because that tree was not required to be planted given that the percent survival of eastern hemlocks on Parcel I8-23-6 is greater than 100% of the quantity specified on the planting plan. For the plantings on Parcel I8-23-4, the two-year monitoring period began with the May 2008 inspection and will end in August/September 2009. In the event that any additional trees are planted at either property, such trees will be tagged, added to Figure 4 from the Final Completion Report, and inspected twice per year for a two-year period after planting.

Future inspections will utilize the Inspection Summary and Checklist forms included in the Final Completion Report. Within 30 days following each inspection, an inspection report will be prepared and submitted to EPA.

Please call me if you have any comments or questions.

Sincerely

*Richard W. Gates / EGB*

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 EOEEA\*  
Mayor James Ruberto, City of Pittsfield

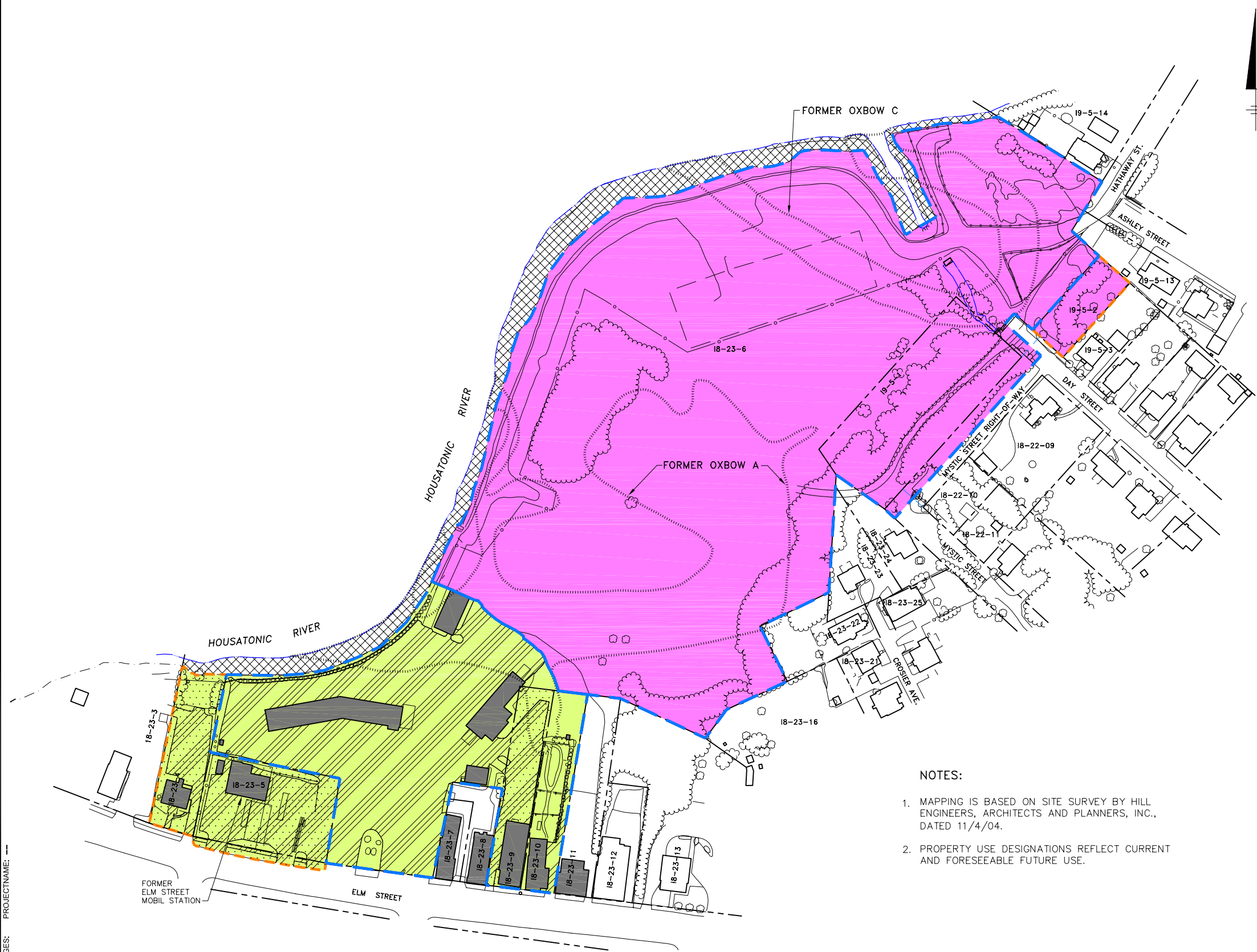
Michael Carroll, GE\*  
Rod McLaren, GE\*  
Peter Wojcik, GE\*  
James Nuss, ARCADIS  
James Bieke, Goodwin Procter  
Property Owner – Parcel I8-23-4  
Property Owner – Parcels I8-23-6 & I9-5-1  
Property Owner – Parcel I8-23-5  
Property Owner – Parcel I8-23-9  
Public Information Repositories  
GE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

*\* cover letter only*

ARCADIS

**Figures**

CITY: SYRACUSE DIV/GROUP: 141 DB: DWM/LAF/GMS LD: DWM PK: (Revised) Lyr: ON=OFF=REF ITXT IMAP\_NUM  
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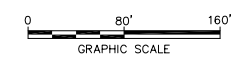
**LEGEND:**

- 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.



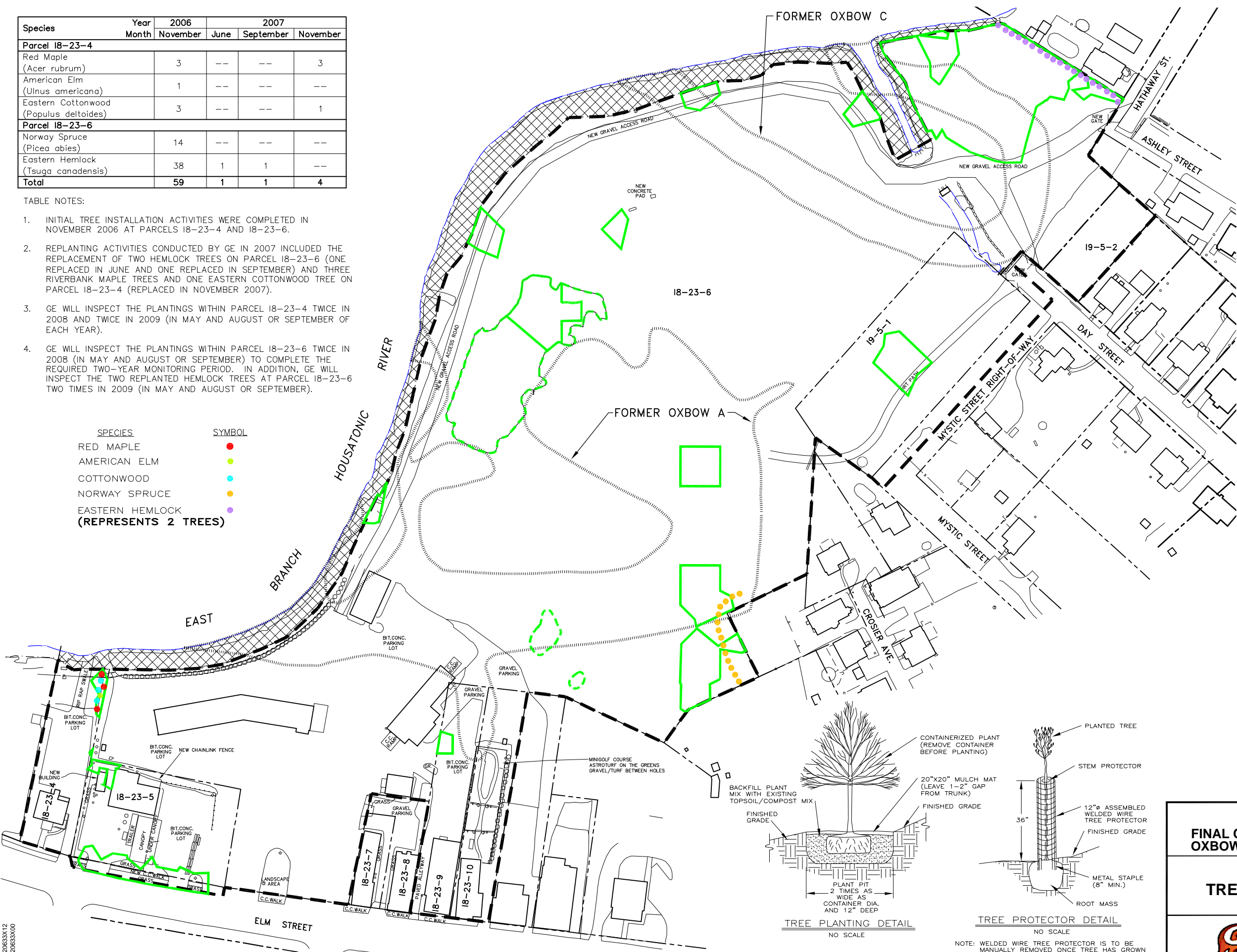
GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS <b>MAY 2008 INSPECTION</b>	
<h2 style="margin: 0;">SITE PLAN</h2>	
	FIGURE <h1 style="font-size: 2em; margin: 0;">1</h1>

Species	Year Month	2006		2007	
		November	June	September	November
<b>Parcel 18-23-4</b>					
Red Maple (Acer rubrum)		3	--	--	3
American Elm (Ulnus americana)		1	--	--	--
Eastern Cottonwood (Populus deltoides)		3	--	--	1
<b>Parcel 18-23-6</b>					
Norway Spruce (Picea abies)		14	--	--	--
Eastern Hemlock (Tsuga canadensis)		38	1	1	--
<b>Total</b>		<b>59</b>	<b>1</b>	<b>1</b>	<b>4</b>

TABLE NOTES:

- INITIAL TREE INSTALLATION ACTIVITIES WERE COMPLETED IN NOVEMBER 2006 AT PARCELS 18-23-4 AND 18-23-6.
- REPLANTING ACTIVITIES CONDUCTED BY GE IN 2007 INCLUDED THE REPLACEMENT OF TWO HEMLOCK TREES ON PARCEL 18-23-6 (ONE REPLACED IN JUNE AND ONE REPLACED IN SEPTEMBER) AND THREE RIVERBANK MAPLE TREES AND ONE EASTERN COTTONWOOD TREE ON PARCEL 18-23-4 (REPLACED IN NOVEMBER 2007).
- GE WILL INSPECT THE PLANTINGS WITHIN PARCEL 18-23-4 TWICE IN 2008 AND TWICE IN 2009 (IN MAY AND AUGUST OR SEPTEMBER OF EACH YEAR).
- GE WILL INSPECT THE PLANTINGS WITHIN PARCEL 18-23-6 TWICE IN 2008 (IN MAY AND AUGUST OR SEPTEMBER) TO COMPLETE THE REQUIRED TWO-YEAR MONITORING PERIOD. IN ADDITION, GE WILL INSPECT THE TWO REPLANTED HEMLOCK TREES AT PARCEL 18-23-6 TWO TIMES IN 2009 (IN MAY AND AUGUST OR SEPTEMBER).

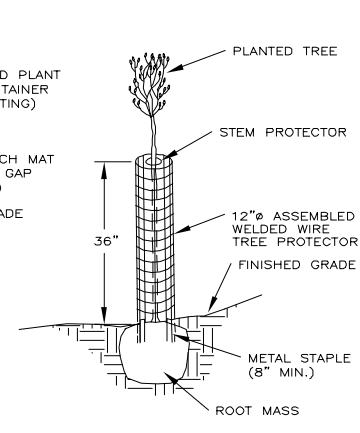
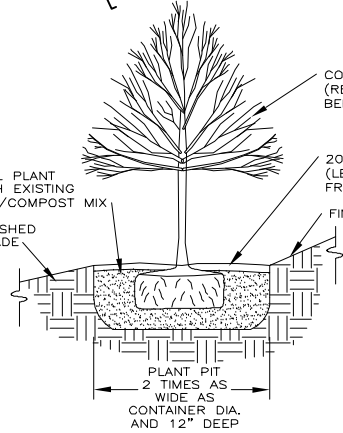
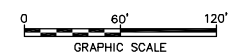
SPECIES	SYMBOL
RED MAPLE	●
AMERICAN ELM	●
COTTONWOOD	●
NORWAY SPRUCE	●
EASTERN HEMLOCK (REPRESENTS 2 TREES)	●



LEGEND:

- APPROXIMATE REMOVAL ACTION AREA BOUNDARY
- - - PROPERTY BOUNDARY
- 18-23-6 PROPERTY ID
- EDGE OF WATER
- APPROXIMATE FORMER OXBOW/LOW LYING AREA
- BUILDING
- ▨ AREA INCLUDED AS PART OF 1 1/2-MILE REACH REMOVAL ACTION
- LIMITS OF SOIL REMOVAL TO ACHIEVE PERFORMANCE STANDARDS
- LIMITS OF FORMER SOIL OR LOAM PILES

NOTE:  
1. MAPPING IS BASED ON SITE SURVEYS BY HILL ENGINEERS, ARCHITECTS & PLANNERS, INC., DATED 11/4/04 AND 1/29/07.



NOTE: WELDED WIRE TREE PROTECTOR IS TO BE MANUALLY REMOVED ONCE TREE HAS GROWN TO 4" DBH.

GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
**FINAL COMPLETION REPORT FOR FORMER OXBOW AREAS A AND C REMOVAL ACTION**

**SUMMARY OF TREE RESTORATION ACTIVITIES**

FIGURE 4

CITY: SYR DIV/GRP: 85 DB/DMM/LAF/DMM LD: DMM PIC/OP: PM/REQD TM/OP: LYR/OP/CON=OFF=REF=FRZN G/CAD/GE-CAD/N-ACT/002063300000013D/03/FINAL/20633009.DWG LAYOUT: 4 SAVED: 4/30/2008 11:52 AM AC-ADVER: 17.0S (LMS TECH) PAGESETUP: --- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 4/30/2008 10:06 PM BY: WODARCZYK, DAVID XREFS: 20633X12 20633X00

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**Attachments**



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**Attachment A**

Completed Inspection Forms

**INSPECTION SUMMARY AND CHECKLIST**

**FORMER OXBOW AREAS A AND C**

**PARCEL I8-23-4**

**I. GENERAL INFORMATION**

Inspection Date: 5/29/2008  
Conducted By/Phone Number: Gregg Rabasco / (413) 822-1184  
Weather Conditions: Mostly sunny, 65-70°F  
Date of Last Inspection: 10/24/2007

**II. INSPECTION SUMMARY**

1. Confirm that Figures 3 and 4 from the Final Completion Report and the as-built survey drawing included in Appendix C of the Final Completion Report (and any alternative plan proposed by GE) have been reviewed.  
- Confirmed
  
2. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage outlets, drainage swales, or edges of paved areas, etc.)  
- NA - Subject to annual inspection to be performed in August or September 2008.
  
3. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of stressed/sparse cover], other landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and tree stakes; review the restoration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of planted trees; and measure and record the size of all trees subject to inspection.)  
- Vegetative cover in good condition.  
- Tree observations are shown in Tables B-1 through B-3 in Attachment B; all trees in good condition.  
- Tree cages on three eastern cottonwood trees and one American elm tree need center guards and zip-tie reinforcements on cages.
  
4. **Areas Potentially Susceptible to Erosion** (Inspect any other areas that are potentially subject to erosion as a result of the remediation, including drainage outlets, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence of any erosion. Include, where relevant, an inspection of the drainage swales on Parcels I8-23-4 (one swale) and I8-23-6 (3 swales), the drainage outlets on Parcel I8-23-6 (2 outlets); verify the integrity of these structures and evaluate whether drainage through or discharges from these outlets are causing erosion; verify that there has been no significant movement of riprap or reduction in riprap thickness that threatens the stability of the riprapped swale or drainage outlets, or results in the erosion of underlying soils or sediment or results in the exposure of underlying geotextile fabric [unless such fabric overlays concrete].)  
- NA - Subject to annual inspection to be performed in August or September 2008.
  
5. **Other Observations** (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)  
- Three dead red maples and one dead eastern cottonwood were replaced in November 2007.  
- Gravel observed to be placed into riprap swale area.

**III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES**

- Repair tree cages on three eastern cottonwood trees and one American elm tree.

**ATTACH ADDITIONAL INFORMATION AS APPROPRIATE**

**INSPECTION SUMMARY AND CHECKLIST**

**FORMER OXBOW AREAS A AND C**

**PARCEL I8-23-5**

**I. GENERAL INFORMATION**

Inspection Date: 5/29/2008  
Conducted By/Phone Number: Gregg Rabasco / (413) 822-1184  
Weather Conditions: Mostly sunny, 65-70°F  
Date of Last Inspection: 10/24/2007

**II. INSPECTION SUMMARY**

1. Confirm that Figures 3 and 4 from the Final Completion Report and the as-built survey drawing included in Appendix C of the Final Completion Report (and any alternative plan proposed by GE) have been reviewed.  
- Confirmed
  
2. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage outlets, drainage swales, or edges of paved areas, etc.)  
- NA - Subject to annual inspection to be performed in August or September 2008.
  
3. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of stressed/sparse cover], other landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and tree stakes; review the restoration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of planted trees; and measure and record the size of all trees subject to inspection.)  
- Vegetative cover in good condition. (No trees planted.)
  
4. **Areas Potentially Susceptible to Erosion** (Inspect any other areas that are potentially subject to erosion as a result of the remediation, including drainage outlets, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence of any erosion. Include, where relevant, an inspection of the drainage swales on Parcels I8-23-4 (one swale) and I8-23-6 (3 swales), the drainage outlets on Parcel I8-23-6 (2 outlets); verify the integrity of these structures and evaluate whether drainage through or discharges from these outlets are causing erosion; verify that there has been no significant movement of riprap or reduction in riprap thickness that threatens the stability of the riprapped swale or drainage outlets, or results in the erosion of underlying soils or sediment or results in the exposure of underlying geotextile fabric [unless such fabric overlays concrete].)  
- NA - Subject to annual inspection to be performed in August or September 2008.
  
5. **Other Observations** (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)  
- Sparse grass cover between the sidewalk and Elm Street to be monitored during the August/September 2008 inspection.

**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: 5/29/2008  
Conducted By/Phone Number: Gregg Rabasco / (413) 822-1184  
Weather Conditions: Mostly sunny, 65-70°F  
Date of Last Inspection: 10/24/2007

**II. INSPECTION SUMMARY**

1. Confirm that Figures 3 and 4 from the Final Completion Report and the as-built survey drawing included in Appendix C of the Final Completion Report (and any alternative plan proposed by GE) have been reviewed.  
- Confirmed
  
2. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage outlets, drainage swales, or edges of paved areas, etc.)  
- NA - Subject to annual inspection to be performed in August or September 2008.
  
3. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of stressed/sparse cover], other landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and tree stakes; review the restoration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of planted trees; and measure and record the size of all trees subject to inspection.)  
- Vegetative cover in good condition.  
- Tree observations are shown in Tables B-4 and B-5 in Attachment B; all trees in good condition except:  
\* One dead eastern hemlock was observed.  
\* One Norway spruce was observed to be leaning.  
\* One Norway spruce was observed to be stressed.
4. **Areas Potentially Susceptible to Erosion** (Inspect any other areas that are potentially subject to erosion as a result of the remediation, including drainage outlets, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence of any erosion. Include, where relevant, an inspection of the drainage swales on Parcels I8-23-4 (one swale) and I8-23-6 (3 swales), the drainage outlets on Parcel I8-23-6 (2 outlets); verify the integrity of these structures and evaluate whether drainage through or discharges from these outlets are causing erosion; verify that there has been no significant movement of riprap or reduction in riprap thickness that threatens the stability of the riprapped swale or drainage outlets, or results in the erosion of underlying soils or sediment or results in the exposure of underlying geotextile fabric [unless such fabric overlays concrete].)  
- NA - Subject to annual inspection to be performed in August or September 2008.
  
5. **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/sinkholes observed along the top of the riverbank approximately 75- to 100-feet south of riprap area E on Figure 3 of the FCR and along the top of the riverbank southeast of the eastern hemlock planting area.

**III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES**

- Replace the dead eastern hemlock (not required since total quantity in good health [45] exceeds quantity specified in planting plan [38] due to planting of 8 additional hemlocks).
- Straighten the leaning Norway spruce and replant roots.
- Monitor the other stressed Norway spruce.
- Repair erosion/sinkholes observed along the top of the riverbank.

**ATTACH ADDITIONAL INFORMATION AS APPROPRIATE**

**INSPECTION SUMMARY AND CHECKLIST**

**FORMER OXBOW AREAS A AND C**

**PARCEL I8-23-9**

**I. GENERAL INFORMATION**

Inspection Date: 5/29/2008  
Conducted By/Phone Number: Gregg Rabasco / (413) 822-1184  
Weather Conditions: Mostly sunny, 65-70°F  
Date of Last Inspection: 10/24/2007

**II. INSPECTION SUMMARY**

1. Confirm that Figures 3 and 4 from the Final Completion Report and the as-built survey drawing included in Appendix C of the Final Completion Report (and any alternative plan proposed by GE) have been reviewed.

- Confirmed

2. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage outlets, drainage swales, or edges of paved areas, etc.)

- NA - Subject to annual inspection to be performed in August or September 2008.

3. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of stressed/sparse cover], other landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and tree stakes; review the restoration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of planted trees; and measure and record the size of all trees subject to inspection.)

- NA (no vegetation was planted as part of restoration activities at this parcel).

4. **Areas Potentially Susceptible to Erosion** (Inspect any other areas that are potentially subject to erosion as a result of the remediation, including drainage outlets, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence of any erosion. Include, where relevant, an inspection of the drainage swales on Parcels I8-23-4 (one swale) and I8-23-6 (3 swales), the drainage outlets on Parcel I8-23-6 (2 outlets); verify the integrity of these structures and evaluate whether drainage through or discharges from these outlets are causing erosion; verify that there has been no significant movement of riprap or reduction in riprap thickness that threatens the stability of the riprapped swale or drainage outlets, or results in the erosion of underlying soils or sediment or results in the exposure of underlying geotextile fabric [unless such fabric overlays concrete].)

- NA - Subject to annual inspection to be performed in August or September 2008.

5. **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: 5/29/2008  
Conducted By/Phone Number: Gregg Rabasco / (413) 822-1184  
Weather Conditions: Mostly sunny, 65-70°F  
Date of Last Inspection: 10/24/2007

**II. INSPECTION SUMMARY**

1. Confirm that Figures 3 and 4 from the Final Completion Report and the as-built survey drawing included in Appendix C of the Final Completion Report (and any alternative plan proposed by GE) have been reviewed.

- Confirmed

2. **Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage outlets, drainage swales, or edges of paved areas, etc.)

- NA - Subject to annual inspection to be performed in August or September 2008.

3. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of stressed/sparse cover], other landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and tree stakes; review the restoration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of planted trees; and measure and record the size of all trees subject to inspection.)

- Vegetative cover in good condition. (No trees/shrubs planted.)

4. **Areas Potentially Susceptible to Erosion** (Inspect any other areas that are potentially subject to erosion as a result of the remediation, including drainage outlets, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence of any erosion. Include, where relevant, an inspection of the drainage swales on Parcels I8-23-4 (one swale) and I8-23-6 (3 swales), the drainage outlets on Parcel I8-23-6 (2 outlets); verify the integrity of these structures and evaluate whether drainage through or discharges from these outlets are causing erosion; verify that there has been no significant movement of riprap or reduction in riprap thickness that threatens the stability of the riprapped swale or drainage outlets, or results in the erosion of underlying soils or sediment or results in the exposure of underlying geotextile fabric [unless such fabric overlays concrete].)

- NA - Subject to annual inspection to be performed in August or September 2008.

5. **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**

**Attachment B**

Documentation of Tree/Shrub  
Observations

**TABLE B-1**  
**SUMMARY OF TREE OBSERVATIONS - PARCEL I8-23-4 - AMERICAN ELM (*ULNUS AMERICANA*)**  
**SUMMARY OF MAY 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS A AND C**  
**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

<b>Tree/Shrub</b>	<b>Height (ft.)</b>	<b>Condition of Tree</b>	<b>Condition of Tree Cage, Guard, and Stakes (where present)</b>
1	6	Good	Needs Repair

<b>Average Height (ft.):</b>	<b>6</b>
<b>Height Range (ft.):</b>	<b>--</b>
<b>Total Tree Count:</b>	<b>1</b>



**TABLE B-2**  
**SUMMARY OF TREE OBSERVATIONS - PARCEL I8-23-4 - EASTERN COTTONWOOD (*POPULUS DELTOIDES*)**

**SUMMARY OF MAY 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS A AND C  
 GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

<b>Tree/Shrub</b>	<b>Height (ft.)</b>	<b>Condition of Tree</b>	<b>Condition of Tree Cage, Guard, and Stakes (where present)</b>
1	10	Good	Needs Repair
2	5	Good	Needs Repair
3	10	Good	Needs Repair

<b>Average Height (ft.):</b>	<b>8.3</b>
<b>Height Range (ft.):</b>	<b>5-10</b>
<b>Total Tree Count:</b>	<b>3</b>

**TABLE B-3  
SUMMARY OF TREE OBSERVATIONS - PARCEL I8-23-4 - RED MAPLE (*ACER RUBRUM*)**

**SUMMARY OF MAY 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS A AND C  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

<b>Tree/Shrub</b>	<b>Height (ft.)</b>	<b>Condition of Tree</b>	<b>Condition of Tree Cage, Guard, and Stakes (where present)</b>
1	6	Good	Good
2	6	Good	Good
3	6	Good	Good

<b>Average Height (ft.):</b>	<b>6</b>
<b>Height Range (ft.):</b>	<b>6-6</b>
<b>Total Tree Count:</b>	<b>3</b>

**TABLE B-4  
SUMMARY OF TREE OBSERVATIONS - PARCEL I8-23-6 - EASTERN HEMLOCK (*TSUGA CANADENSIS*)**

**SUMMARY OF MAY 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS A AND C  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

<b>Tree/Shrub</b>	<b>Height (ft.)</b>	<b>Condition of Tree</b>	<b>Condition of Tree Cage, Guard, and Stakes (where present)</b>
1	9	Good	NA
2	9	Good	NA
3	9	Good	NA
4	9	Good	NA
5	9	Good	NA
6	9	Good	NA
7	8	Good	NA
8	7	Good	NA
9	7	Good	NA
10	9	Good	NA
11	9	Good	NA
12	9	Good	NA
13	7	Good	NA
14	8	Good	NA
15	8	Good	NA
16	8	Good	NA
17	8	Good	NA
18	8	Good	NA
19	8	Good	NA
20	8	Good	NA
21	8	Good	NA
22	8	Good	NA
23	10	Good	NA
24	7	Good	NA
25	8	Good	NA
26	8	Good	NA
27	8	Good	NA
28	7	Good	NA
29	8	Good	NA
30	7	Good	NA
31	8	Good	NA
32	8	Good	NA
33	8	Good	NA
34	8	Good	NA
35	9	Good	NA
36	8	Good	NA
37	8	Good	NA
38	8	Good	NA
39	8	Good	NA
40	9	Good	NA
41	9	Good	NA
42	7	Good	NA
43	NA	Dead	NA
44	8	Good	NA
45	8	Good	NA
46	8	Good	NA

<b>Average Height (ft.):</b>	<b>8.2</b>
<b>Height Range (ft.):</b>	<b>7-10</b>
<b>Total Tree Count:</b>	<b>46</b>

**TABLE B-5  
SUMMARY OF TREE OBSERVATIONS - PARCEL I8-23-6 - NORWAY SPRUCE (*PICEA ABIES*)**

**SUMMARY OF MAY 2008 INSPECTION ACTIVITIES FOR THE FORMER OXBOW AREAS A AND C  
GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS**

<b>Tree/Shrub</b>	<b>Height (ft.)</b>	<b>Condition of Tree</b>	<b>Condition of Tree Cage, Guard, and Stakes (where present)</b>
1	13	Good	NA
2	12	Good	NA
3	12	Good	NA
4	13	Good	NA
5	11	Leaning Badly	NA
6	12	Good	NA
7	13	Good	NA
8	11	Good	NA
9	12	Good	NA
10	11	Good	NA
11	14	Good	NA
12	11	Good	NA
13	11	Good	NA
14	10	Stressed	NA

<b>Average Height (ft.):</b>	<b>12</b>
<b>Height Range (ft.):</b>	<b>10-14</b>
<b>Total Tree Count:</b>	<b>14</b>