

GE 159 Plastics Avenue Pittsfield, MA 01201

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 J and K (GECD420)

Summary of November 2006 Inspection Activities

Dear Mr. Tagliaferro:

On November 1, 2006, the General Electric Company (GE) performed its first post-remediation inspection of the properties within Former Oxbow Areas J and K at which remediation activities have been performed. As shown on Figure 1, Former Oxbow Areas J and K include six commercial parcels (four of which have recreational areas within them), three recreational parcels, and two residential parcels. In accordance with GE's Addendum to Final Removal Design/Removal Action Work Plan for Former Oxbow Areas J and K (Final RD/RA Work Plan Addendum), which was submitted to EPA in April 2006 and conditionally approved by EPA on June 23, 2006, GE conducted remediation activities at all six of the commercial parcels (Parcels K10-13-1, K10-12-1, K10-11-1, K10-11-2, K10-11-3, and K10-11-5) and one residential property (Parcel K10-10-6). These remediation activities were completed in summer 2006. Vegetation restoration activities were subsequently conducted at these properties in accordance with the revised Vegetation Restoration Plan for Former Oxbow Areas J and K, provided in Attachment 2 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 G to the Final 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, as indicated on the attached forms, the November 1, 2006 inspection indicated the following observations requiring further action:

- Tree/shrub plantings at several properties (Parcels K10-11-5 and K10-10-6) remained to be installed later in November.
- Ruts and tracks resulting from recreational vehicles were observed on undeveloped Longview Terrace (adjacent to Parcel K10-12-1) and on Parcels K10-11-3 and K10-11-5. These ruts and tracks need to be repaired and re-seeded, and construction fencing should be placed in areas of Parcels K10-11-3 and K10-11-5 where ruts and tracks were observed to prevent access and allow adequate establishment of vegetation.
- Haybales placed along the swale on Parcel K10-11-2 have been left in place to decrease the potential for erosion. These haybales should be checked at the next inspection to determine if adequate vegetation has been established and whether removal of the haybales is necessary.

The remaining tree/shrub plantings were installed in November 2006. The condition of these trees and shrubs will be checked during the spring 2007 inspection to ensure that they are growing. The maintenance actions to address the observed ruts and tracks will be performed prior to the spring 2007 inspection. The haybales along the swale on Parcel K10-11-2 will be checked in May 2007.

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 J and K 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

Attachment

cc: Tim Conway, EPA Holly Inglis, EPA

Rose Howell, EPA*

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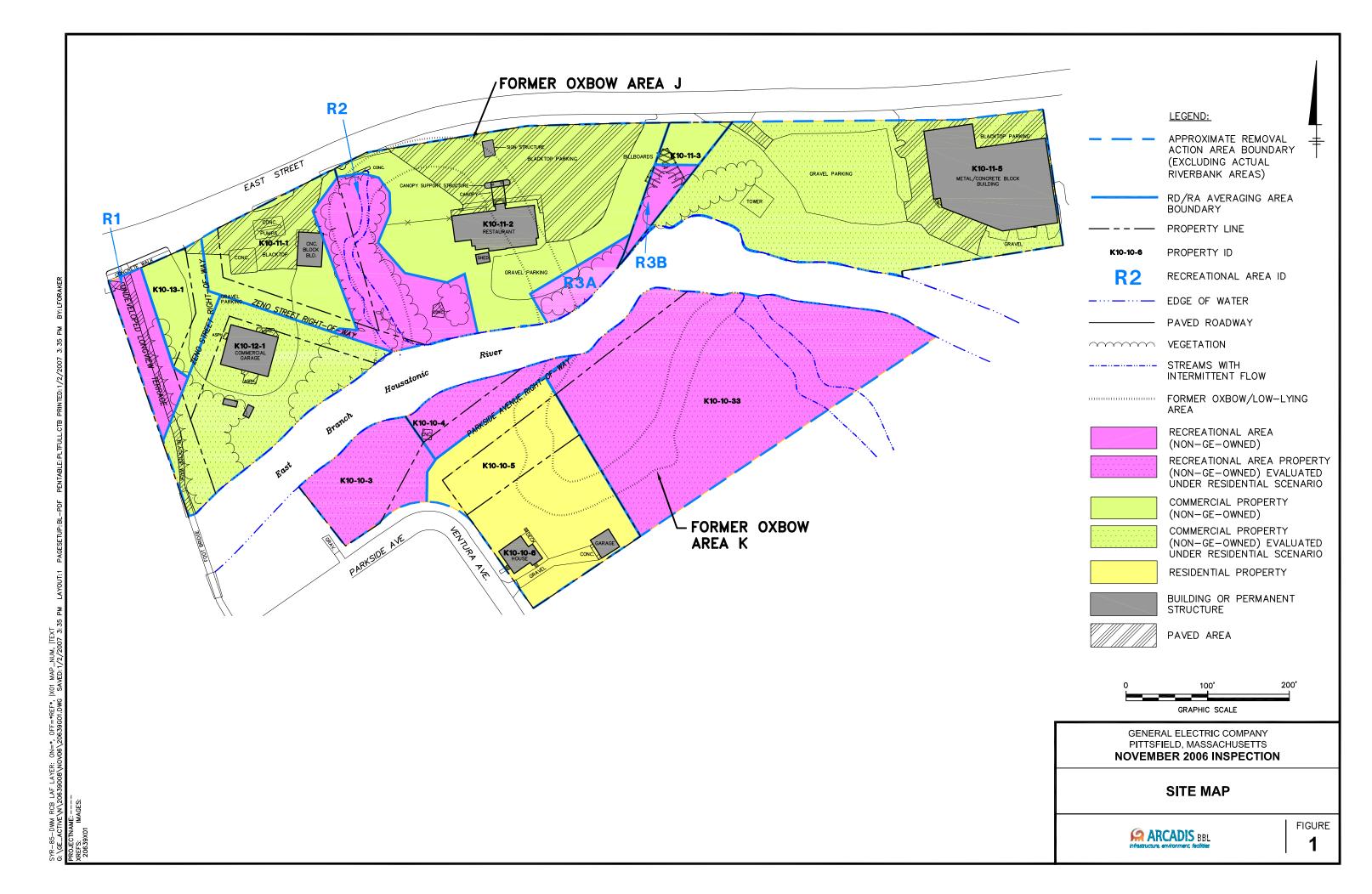
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GE Internal Repository

* cover letter only



Figure





Attachment A

Completed Inspection Forms

FORMER OXBOW AREAS J AND K

PARCEL K10-12-1 / K10-11-1

I. G	. GENERAL INFORMATION				
Con Wea	pection Date: Iducted By: Iduc	11-1-06 Paolo Filippetti Sunny - 55°F			
1.		te any physical changes since last inspection; note evidence of excessive settlement, surface water			
	•	le ruts; excavation activities, unauthorized uses of areas, etc.)			
-	All soil backfill areas are	e in good condition.			
-	All terrain vehicle (ATV)	ruts/tracks have been observed on undeveloped Longview Terrace.			
2.		any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of and other landscaping items (trees, shrubs, etc.)			
-		l K10-12-1 / undeveloped Longview Terrace and Zeno Street right-of-way have been installed.			
-	Grass vegetation has be	een established.			
_					
3.		Confirm that repair/maintenance measures identified during prior inspection have been performed; note any ons, including parcel-specific restoration activities.)			
-	None.				
Ш	FOLLOW-LIP MAINTEN	ANCE AND REPAIR ACTIVITIES			
-	ATV ruts/tracks are to b				
	AT V TUIS/ITACKS ATE IO D	t incu and secucu.			

FORMER OXBOW AREAS J AND K

PARCEL K10-11-2

. GENERAL INFORMATION				
Inspection Date: Conducted By: Weather Conditions: Date of Last Inspection: II. INSPECTION SUMMARY	11-1-06 Paolo Filippetti Sunny - 55°F			
	ote any physical changes since last inspection; note evidence of excessive settlement, surface water			
	cle ruts; excavation activities, unauthorized uses of areas, etc.)			
 Soil backfill areas are in 				
 To decrease erosion por 	tential along swale, hay bales have not been removed.			
	any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of and other landscaping items (trees, shrubs, etc.)			
 All areas have establish 	ed vegetative cover.			
 Planting in planter east of 	of entrance to Bobby Hudpuckers are in good condition.			
 All plantings along bank 	of swale have been installed.			
	Confirm that repair/maintenance measures identified during prior inspection have been performed; note any ons, including parcel-specific restoration activities.)			
- None.				
III. FOLLOW UP MAINTEN	ANCE AND REPAIR ACTIVITIES			
- Ensure pales along swa	lle degrade and no erosion takes place in this general area.			

FORMER OXBOW AREAS J AND K

PARCEL K10-11-3

I. GENERAL INFORMATION				
Inspection Date:	11-1-06			
Conducted By:	Paolo Filippetti			
Weather Conditions:	Sunny - 55°F			
Date of Last Inspection:				
II. INSPECTION SUMMARY				
·	ote any physical changes since last inspection; note evidence of excessive settlement, surface water			
	cle ruts; excavation activities, unauthorized uses of areas, etc.)			
 No erosion in soil back 				
	ruts/tracks observed on top of ridge portion of parcel. Area is to be planted with tree planting this month.			
 Bank excavations back 	filled with rip-rap are in good condition and vegetation has begun to establish itself.			
	e any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of			
	and other landscaping items (trees, shrubs, etc.)			
	of Housatonic River has begun to establish itself.			
 All areas have establish 	· ·			
	upplemental Information Package drawing dated September 15, 2006, tree plantings are			
not to be installed.				
	Confirm that repair/maintenance measures identified during prior inspection have been performed; note any ions, including parcel-specific restoration activities.)			
	ions, including parcer-specific restoration activities.)			
- None.				
III. FOLLOW-UP MAINTEN	IANCE AND REPAIR ACTIVITIES			
 ATV ruts/tracks should 				
 Plastic construction fen 	nce to be installed across ruts/tracks to prevent access.			

FORMER OXBOW AREAS J AND K

PARCEL K10-10-6

I. G	SENERAL INFORMATION	ON CONTRACTOR OF THE PROPERTY
Inspection Date: Conducted By: Weather Conditions: Date of Last Inspection: II. INSPECTION SUMMARY		11-1-06 Paolo Filippetti Sunny - 55°F
1.	Soil Backfill Areas (/\	lote any physical changes since last inspection; note evidence of excessive settlement, surface water
		icle ruts; excavation activities, unauthorized uses of areas, etc.)
-	Soil backfill areas are	n good condition.
-		
2.		e any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of) and other landscaping items (trees, shrubs, etc.)
-		ion "grass" established.
-	Tree plantings to be in	stalled during the month of November.
-		
3.		Confirm that repair/maintenance measures identified during prior inspection have been performed; note any tions, including parcel-specific restoration activities.)
-	None.	
-		
Ш	FOLLOW-LIP MAINTEN	NANCE AND REPAIR ACTIVITIES
	None.	INITIOE AND RELIAM ACTIVITIES
-	1101101	

FORMER OXBOW AREAS J AND K

PARCEL K10-11-5

I. GENERAL INFORMATION				
Inspection Date:	11-1-06			
Conducted By:	Paolo Filippetti			
Weather Conditions:	Sunny - 55°F			
Date of Last Inspection:				
II. INSPECTION SUMMARY				
	ote any physical changes since last inspection; note evidence of excessive settlement, surface water			
	cle ruts; excavation activities, unauthorized uses of areas, etc.)			
 Areas are in good cond 	<u>ition.</u>			
	any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of and other landscaping items (trees, shrubs, etc.)			
) track observed along sewer ridge.			
- Tree plantings are to be				
- All areas have vegetation	on / grass established on them.			
3. Other Observations (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any			
	ions, including parcel-specific restoration activities.)			
- None.				
III FOLLOW LIB MAINTEN	ANCE AND REPAIR ACTIVITIES			
- ATV tracks/ruts should				
- Plastic construction fen	ce to be installed across ruts/tracks to prevent access.			

FORMER OXBOW AREAS J AND K

PARCEL K10-13-1

I. G	SENERAL INFORMATION	N Company of the Comp	
Insp	pection Date:	11-1-06	
Cor	nducted By:	Paolo Filippetti	
We	ather Conditions:	Sunny - 55°F	
Dat	e of Last Inspection:		
	INSPECTION SUMMAR		
1.		ote any physical changes since last inspection; note evidence of excessive settlement, surface water cle ruts; excavation activities, unauthorized uses of areas, etc.)	
	·		
-	Areas in good condition	1.	
2.		e any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of and other landscaping items (trees, shrubs, etc.)	f
-	Area in good condition		
	<u>garana an </u>		
3.		Confirm that repair/maintenance measures identified during prior inspection have been performed; note a ions, including parcel-specific restoration activities.)	any
-	None.		
III.	FOLLOW-UP MAINTEN	ANCE AND REPAIR ACTIVITIES	
-	None.		