



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

November 7, 2007

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 J and K (GECD420)
Summary of October 2007 Inspection Activities**

Dear Mr. Hull:

On October 16, 2007, the General Electric Company (GE) performed the required 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 the U.S. Environmental Protection Agency (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.

GE conducted the previous post-remediation inspections of these properties on November 1, 2006 and May 29, 2007. Summaries of the above-referenced inspection activities were submitted to EPA in letters dated January 3, 2007 and July 11, 2007 respectively. 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 G to the Final RD/RA Work Plan Addendum. Consistent with the previous inspections, this inspection was performed for areas that were backfilled and restored during the implementation of the remediation actions.

Summary of Inspection Activities

The October 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 October 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 July 11, 2007 report related to the May 2007 inspection, follow-up activities included: seeding the six-foot excavation area on Parcel K10-11-3; addressing erosion along the Housatonic River bank on Parcels K10-11-3 and K10-11-5; repairing or replacing beaver controls on Parcel K10-12-1 (completed September 2007); monitoring stressed trees on Parcels K10-10-6 and K10-11-2; and monitoring stressed vegetation on Parcel K10-11-5. All of these activities have been addressed except seeding on Parcel K10-11-3. Recent observations indicate that vegetation is growing, therefore seeding is not necessary at this time. Also, rip-rap was installed along the riverbank on Parcels K10-11-3 and K10-11-5 during the week of October 15, 2007; therefore no further maintenance is required. This area will continue to be monitored for signs of erosion.

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

As indicated on the attached forms, the October 2007 inspection identified the need to conduct the following maintenance activities:

- Install tree guards on saplings on Parcel K10-11-2;
- Install two elm trees on Parcels K10-10-6 and two to four cottonwood trees on Parcel K10-12-1; and
- Monitor trees on Parcels K10-10-6 and K10-11-5.

Maintenance activities identified above will be conducted prior to the fall 2008 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.

GE submitted a draft Final Completion Report to EPA in July 2007. Upon receiving EPA comments on the draft Final Completion Report GE will schedule a pre-certification inspection with EPA and the Massachusetts Department of Environmental Protection, 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 W. Gates/EGB

Richard W. Gates
Remediation Project Manager

Attachment

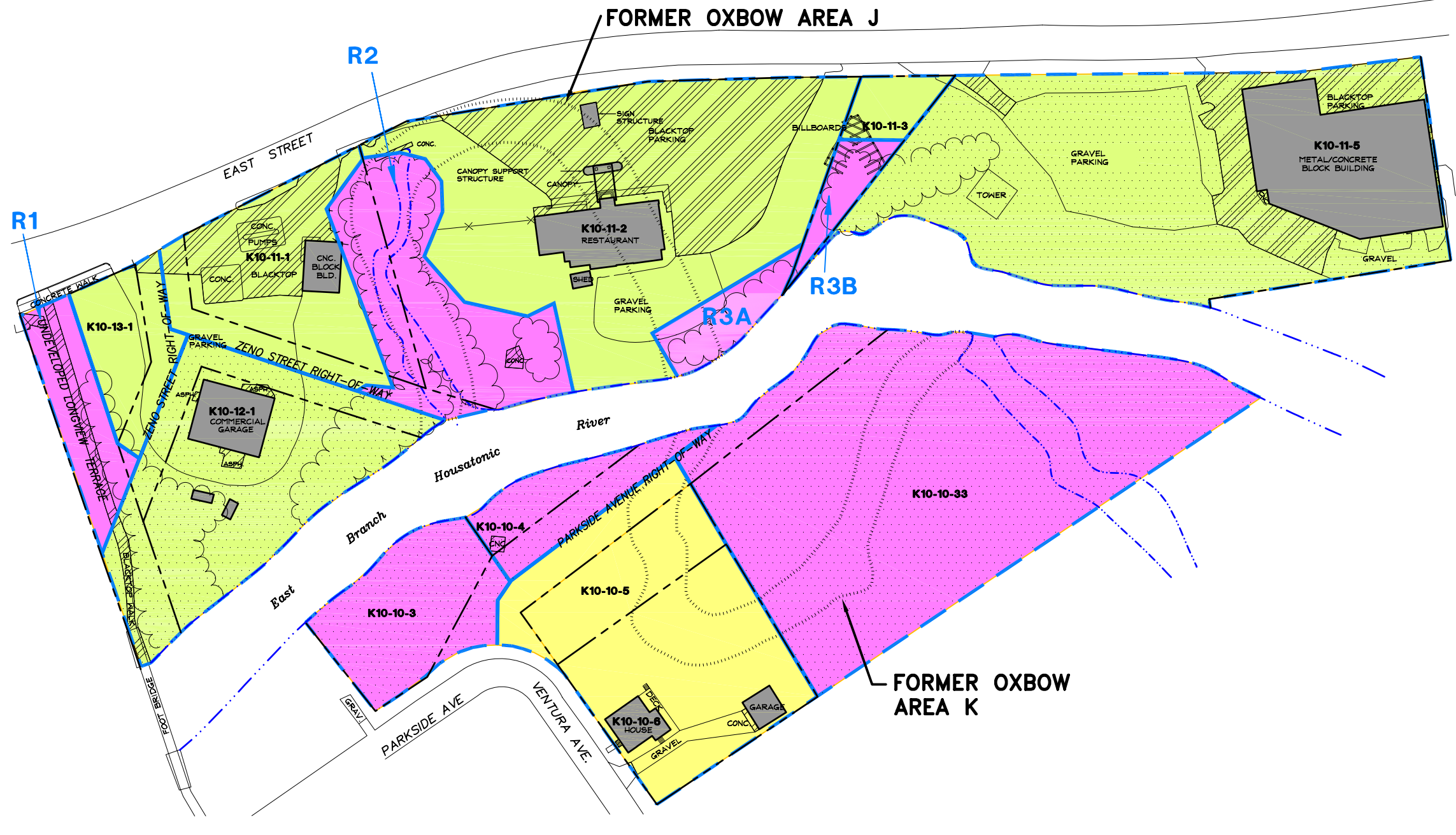
cc: Dean Tagliaferro, EPA
Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston (2 copies)
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Nancy E. Harper, MA AG*
Dale Young, MA EOEA
Mayor James Ruberto, City of Pittsfield
Michael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

Andrew Silber, GE*
Peter Wojcik, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter LLP
Property Owner – Parcels K10-11-1 & K10-12-1
Property Owner – Parcels K10-11-2
Property Owner – Parcels K10-11-3
Property Owner – Parcels K10-11-5
Property Owner – Parcels K10-11-6
Property Owner – Parcel K10-13-1
Public Information Repositories
GE Internal Repository

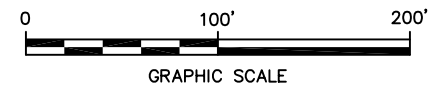
** cover letter only*

Figure

SYR-85-DWM KEM LAF LAYER: ON=*, OFF=*REF*, X01 MAP_NUM. ITEXT
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 PROJECTNAME: 30910X01
 XREFS: IMAGES:



- LEGEND:**
- APPROXIMATE REMOVAL ACTION AREA BOUNDARY (EXCLUDING ACTUAL RIVERBANK AREAS)
 - RD/RA AVERAGING AREA BOUNDARY
 - PROPERTY LINE
 - K10-10-6** PROPERTY ID
 - R2** RECREATIONAL AREA ID
 - EDGE OF WATER
 - PAVED ROADWAY
 - VEGETATION
 - STREAMS WITH INTERMITTENT FLOW
 - FORMER OXBOW/LOW-LYING AREA
 - RECREATIONAL AREA (NON-GE-OWNED)
 - RECREATIONAL AREA PROPERTY (NON-GE-OWNED) EVALUATED UNDER RESIDENTIAL SCENARIO
 - COMMERCIAL PROPERTY (NON-GE-OWNED)
 - COMMERCIAL PROPERTY (NON-GE-OWNED) EVALUATED UNDER RESIDENTIAL SCENARIO
 - RESIDENTIAL PROPERTY
 - BUILDING OR PERMANENT STRUCTURE
 - PAVED AREA



GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
OCTOBER 2007 INSPECTION

SITE MAP

FIGURE
1

Attachment A

Completed Inspection Forms

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-10-6

I. GENERAL INFORMATION

Inspection Date: 10/16/07
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 65°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.)*

- Two dead elms.

- Seven stressed elms.

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

- Install two additional elms and monitor seven stressed elms.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-1

I. GENERAL INFORMATION

Inspection Date: 10/16/07
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 65°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 J AND K

PARCEL K10-11-2

I. GENERAL INFORMATION

Inspection Date: 10/16/07
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 65°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.)

- Scarring on several trees due to beaver controls.

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

- Install tree guards.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-3

I. GENERAL INFORMATION

Inspection Date: 10/16/07
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 65°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.)

- Vegetation is growing in six-foot excavation along East Street identified in previous inspection, therefore seeding was not necessary.

- Rip-rap was installed along the riverbank.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-11-5

I. GENERAL INFORMATION

Inspection Date: 10/16/07
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 65°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.)

- One stressed dogwood.

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.)

- Rip-rap was installed along the riverbank.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Monitor stressed dogwood.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-12-1

I. GENERAL INFORMATION

Inspection Date: 10/16/07
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 65°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.)*

- Two dead cottonwoods due to beaver controls.

- Two broken cottonwoods due to beaver controls.

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.)*

- Beaver controls have been repaired/replaced.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Possibly re-install two - four cottonwood trees.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

FORMER OXBOW AREAS J AND K

PARCEL K10-13-1

I. GENERAL INFORMATION

Inspection Date: 10/16/07
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 65°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