

GE 159 Plastics Avenue Pittsfield, MA 01201 USA

Transmitted via Overnight Courier

June 18, 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 J and K (GECD420)

**Summary of May 2008 Vegetation Inspection Activities** 

Dear Mr. Hull:

On May 21, 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 J and K Removal Action Area (RAA) at which remediation was 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. 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), completing those activities 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 for this and other RAAs.

GE previously conducted post-remediation inspections of these properties on November 1, 2006, May 29, 2007, and October 16, 2007. Summaries of those inspection activities were submitted to EPA in letters dated January 3, 2007, July 11, 2007, and November 7, 2007, respectively. Those 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 J and K, as revised and set forth in Attachment G to GE's April 2006 Addendum to Final RD/RA Work Plan.

The May 2008 inspection was performed for areas where vegetation was planted during the implementation of the remediation actions and was carried out in accordance with the Post-Removal Site Control Plan contained in Section 7 of GE's Final Completion Report for the Former Oxbow Areas J and K Removal Action (Final Completion Report), which was submitted to EPA May 13, 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 inspections to be performed in August or September.

#### **Summary of Inspection Activities**

The May 2008 inspection included 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 and shrubs planted 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 and shrubs that were planted as part of restoration activities. Observations at these properties included a stem count of planted and newly established trees/shrubs (quantity per species per parcel) in good health and a stem count of trees/shrubs that were dead or dying or showing evidence of stress, if any, within each property. The results of the observations were used to evaluate if trees/shrubs are surviving at a frequency of 100% of the original planted quantity (as specified on Figure 4 from the Final Completion Report). Additionally, each tree/shrub observed was measured to determine the average height and range of heights of each species of tree/shrub within each property. In conjunction with the tree and shrub 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 maintenance activities had been identified during the prior inspection, conducted in October 2007. Those activities included installing tree guards on saplings on Parcel K10-11-2, installing two elm trees on Parcels K10-10-6 and two to four cottonwood trees on Parcel K10-12-1, and monitoring trees on Parcels K10-10-6 and K10-11-5. All of these activities were conducted in November 2007 (four new cottonwoods were planted at Parcel K10-12-1). Shrub cages on Parcel K10-11-5 (except along raised sewer easement) were also removed 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/shrub observations is provided in tables in Attachment B. These tables list, for each species at each parcel at which trees or shrubs were planted, the number of trees/shrubs observed, the height of each individual tree/shrub counted, the condition of each tree/shrub 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 and shrubs planted were in good condition. However, a number of dead or stressed trees and shrubs were identified, as indicated on the forms in Attachment A and tables in Attachment B. The results of the tree/shrub counting, measuring, and observation activities at the four parcels where tress/shrubs were planted are summarized in the following table:

| Tree/Shrub Count Results |                       |                      |                               |                                      |                        |                              |  |                            |
|--------------------------|-----------------------|----------------------|-------------------------------|--------------------------------------|------------------------|------------------------------|--|----------------------------|
| Parcel                   | Species               | Planted <sup>1</sup> | Observed<br>in Good<br>Health | Observed Dead/ Stressed <sup>2</sup> | Avg<br>Height<br>(ft.) | Range of<br>Heights<br>(ft.) | Percent<br>in Good<br>Health<br>(%) <sup>3</sup> | Percent<br>Survival<br>(%) |
| K10-10-6                 | American<br>Elm       | 9                    | 9                             | 1/0                                  | 4.4                    | 4-5                          | 100  | 100                        |
|                          | Eastern<br>Hemlock    | 4                    | 4                             | 0                                    | 5.5                    | 5-6                          | 100  | 100                        |
| K10-11-2                 | Black Willow          | 10                   | 10                            | 0                                    | 5.7                    | 4-8                          | 100  | 100                        |
|                          | Eastern<br>Cottonwood | 9                    | 8                             | 1/0                                  | 9.8                    | 8-11                         | 89   | 89                         |
|                          | Red Maple             | 2                    | 0                             | 1/1                                  | 2                      |                              | 0  | 50                         |
| K10-11-5                 | Choke Cherry          | 20                   | 23                            | 2                                    | 2.0                    | 1-5                          | >100   | >100                       |
|                          | Northern<br>Arrowwood | 20                   | 17                            | 2/1                                  | 3.8                    | 3-5                          | 85   | 90                         |
|                          | Silky<br>Dogwood      | 20                   | 17                            | 3/0                                  | 2.9                    | 2-4                          | 85   | 85                         |
|                          | Winterberry           | 20                   | 19                            | 1/0                                  | 2.8                    | 1-4                          | 95   | 95                         |
| K10-12-1                 | American<br>Elm       | 2                    | 2                             | 0                                    | 3.5                    | 2-5                          | 100  | 100                        |
|                          | Eastern<br>Cottonwood | 14                   | 15                            | 3/0                                  | 8.1                    | 3-12                         | >100   | >100                       |
|                          | White Ash             | 1                    | 1                             | 0                                    | 3                      |                              | 100  | 100                        |

#### Notes:

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

Note that, in the above table, the quantities of certain species at certain properties (namely, American elms at Parcel K10-10-6, choke cherries at Parcel K10-11-5, and eastern cottonwoods at Parcel K10-12-1) are higher than the original planted quantities. In accordance with discussions with EPA, certain trees/shrubs that were either (i) planted and did not meet the required specification or (ii) showing signs of stress were left in place, and replacement trees were installed. Therefore, in these cases, more trees/shrubs are present than the number originally planted. In these cases, the percentages of trees/shrubs in good health and the percentages surviving are 100% or greater relative to the originally planted quantities. Accordingly, no further planting of these species at these parcels is necessary.

For the remaining species and parcels, the results of the tree/shrub observations indicated that the trees/shrubs planted were in good health with the following exceptions:

- One dead eastern cottonwood, one dead red maple, and one stressed red maple at Parcel K10-11-2;
   and
- Two dead northern arrowwoods and one stressed northern arrowwood, three dead silky dogwoods, and one dead winterberry at Parcel K10-11-5.

In addition, as shown on the attached forms, the inspection revealed that the tree guards, cages, and stakes (where present) for live trees were in good condition, with the exception of the tree guard at the white ash tree on Parcel K10-12-1, which needs replacement.

#### Maintenance/Replanting Activities

Based on the May 2008 inspection, GE will undertake the following activities:

- Install one eastern cottonwood and one red maple on Parcel K10-11-2 and two northern arrowwoods, three silky dogwoods, and one winterberry on Parcel K10-11-5;
- Monitor one stressed red maple on Parcel K10-11-2 and one northern arrowwood on Parcel K10-11-5; and
- Replace tree guard around white ash tree on Parcel K10-12-1.

These activities will be conducted prior to the next inspection in August or September 2008. The replanted trees/shrubs will be installed in accordance with the previously approved planting plan. GE will equip replanted trees and shrubs with a tag identifying the species of tree or shrub, the installation date, and the general size at the time of installation. Going forward, when trees or shrubs are replanted, GE will revise Figure 4 from the Final Completion Report to include the species, installation date, and size at the time of replanting of any replanted trees or shrubs. The revised Figure 4 will be submitted to EPA and serve as the basis for the next inspection.

#### **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. All the revegetated areas will be inspected in August/September 2008 and in May and August/September 2009 to assess the condition of the vegetation. In addition, the new trees and shrubs that will be installed as described above will be inspected twice per year (in May and August or September) for a total of two years after planting.

These 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.

hichard W. Gates/sme

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 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 K10-10-6
Property Owner — Parcel K10-11-1
Property Owner — Parcel K10-11-2
Property Owner — Parcel K10-11-3
Property Owner — Parcel K10-11-5
Property Owner — Parcel K10-12-1
Property Owner — Parcel K10-13-1
Public Information Repositories
GE Internal Repository

<sup>\*</sup> cover letter only

### **ARCADIS**

Figures

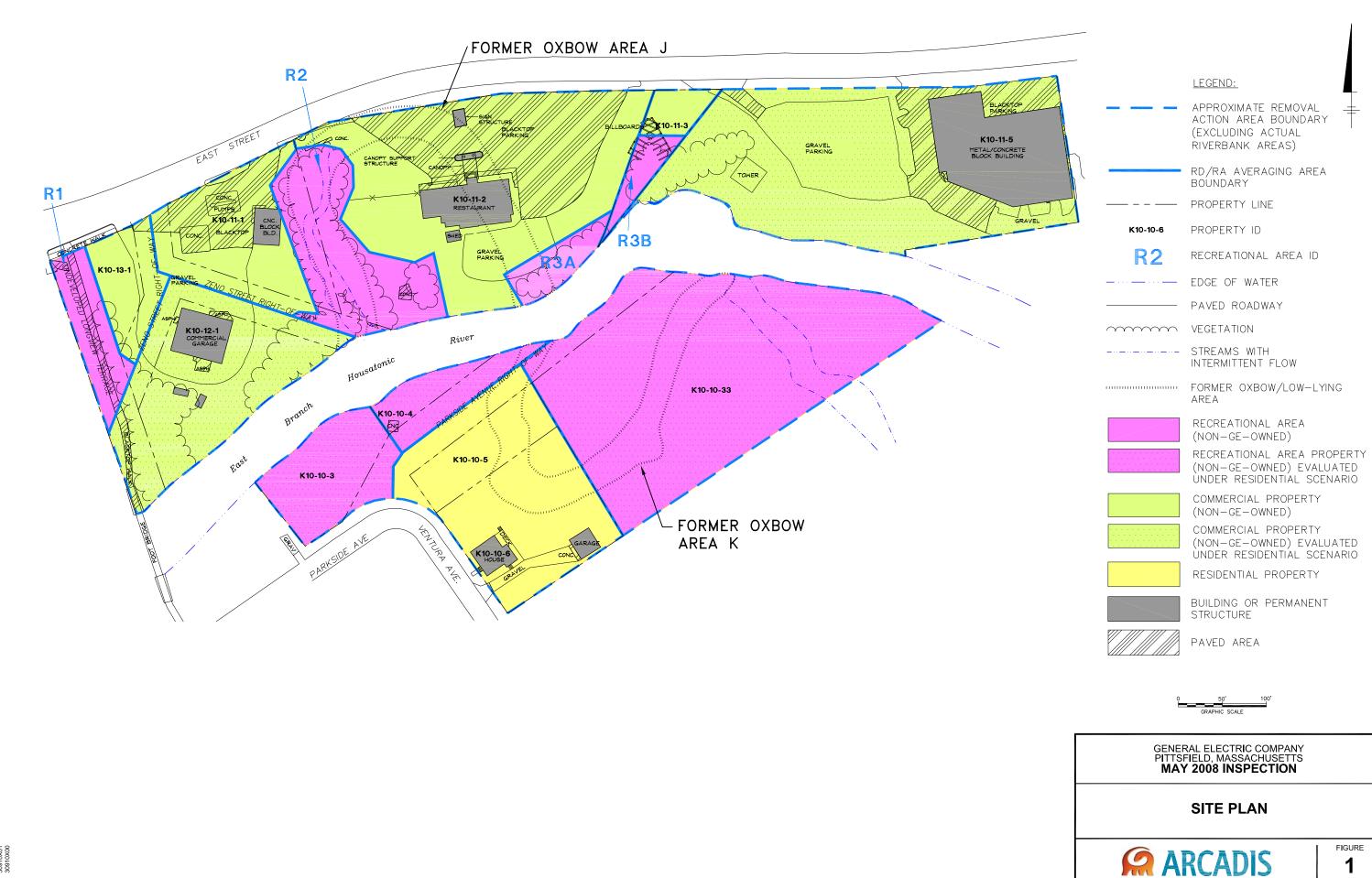
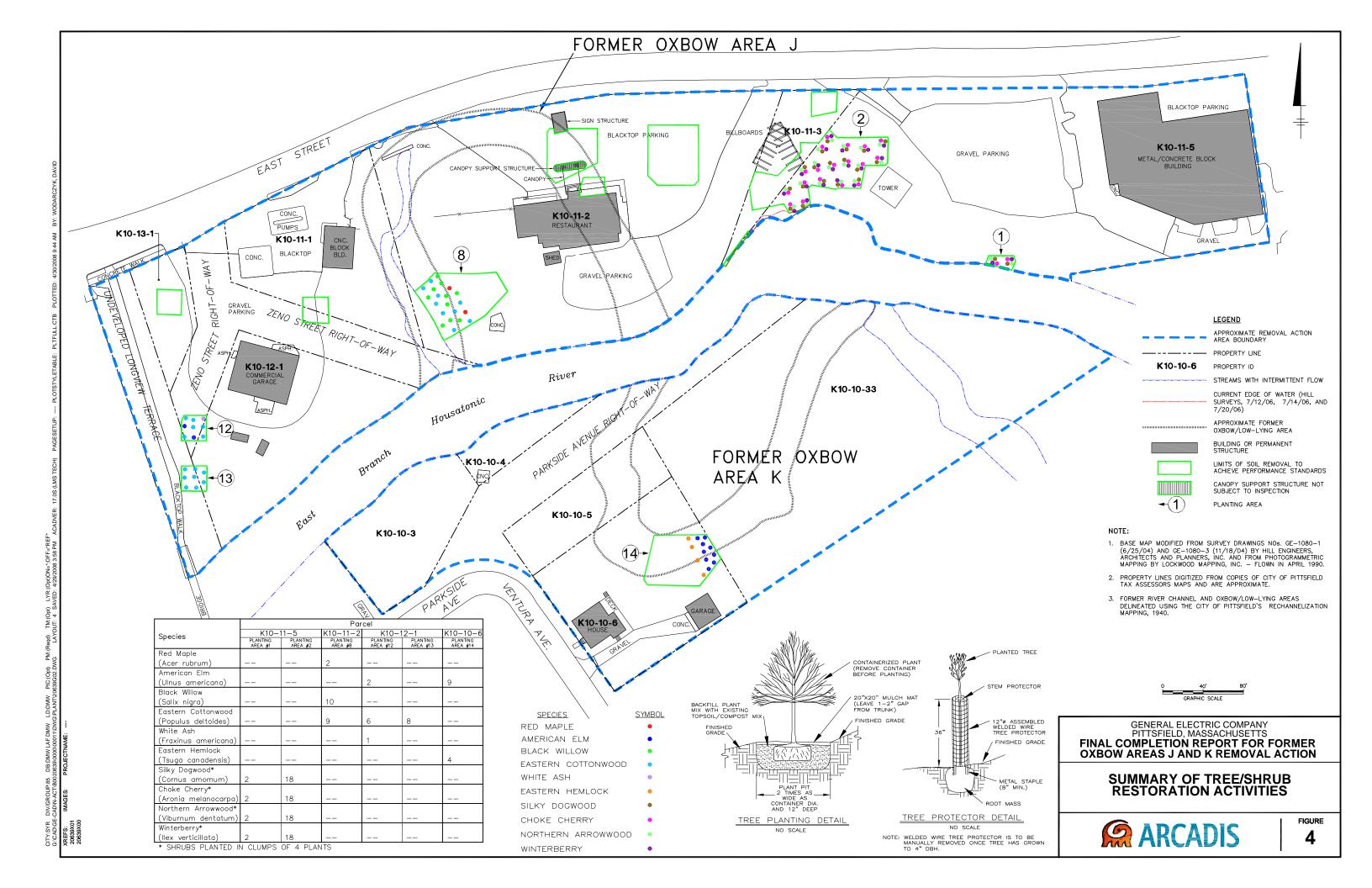


FIGURE 1



### **ARCADIS**

#### Attachment A

Completed Inspection Forms

#### FORMER OXBOW AREAS J AND K

#### **PARCEL K10-10-6**

| I. GENERAL INFORMATION                                  |   |  |  |  |  |  |
|---|---|--|--|--|--|--|
|   |   |  |  |  |  |  |
| Inspection Date:  | 5/21/2008   |  |  |  |  |  |
| Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184 |   |  |  |  |  |  |
| Weather Conditions:                                     | Mostly sunny - 60°F   |  |  |  |  |  |
| Date of Last Inspection: 10/16/2007                     |   |  |  |  |  |  |
| •   |   |  |  |  |  |  |
| 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  |  |  |  |  |  |
|   | y alternative plan proposed by GE) have been reviewed.  |  |  |  |  |  |
| - Confirmed   |   |  |  |  |  |  |
|   |   |  |  |  |  |  |
| 2. Soil Backfill Areas (Note a                          | any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil   |  |  |  |  |  |
|   | ding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage  |  |  |  |  |  |
| outlets, drainage swales, or                            | r edges of paved areas, etc.)   |  |  |  |  |  |
| <ul> <li>N/A - subject to annual insp</li> </ul>        | pection to be performed in August or September 2008.  |  |  |  |  |  |
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|   | physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of   |  |  |  |  |  |
|   | er landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and  |  |  |  |  |  |
|   | oration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of   |  |  |  |  |  |
| ,   | and measure and record the size of all trees and shrubs subject to inspection.)   |  |  |  |  |  |
| Vegetative cover in good co                             |   |  |  |  |  |  |
|   | n Tables B-1 and B-2 in Attachment B:   |  |  |  |  |  |
|   | one dead elm observed but does not affect percent survival compared to original planted quantity,   |  |  |  |  |  |
| ' '   | served (10) is greater than original planted quantity (9) due to replanting of two elms in November 2007.   |  |  |  |  |  |
| * All eastern hemlocks in go                            |   |  |  |  |  |  |
|   | tible to Erosion (Inspect any other areas that are potentially subject to erosion as a result of the remediation, 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 riverbank areas lined with riprap following remediation activities on Parcels   |  |  |  |  |  |
|   | rify the integrity of these structures.)  |  |  |  |  |  |
|   | pection to be performed in August or September 2008.  |  |  |  |  |  |
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| 5. Paved Area Subject to Ins                            | spection (Inspect the paved area on Parcel K10-11-5 that is identified on Figure 3 of the Final Completion  |  |  |  |  |  |
|   | of any locations where the pavement is broken up and/or missing and soil is clearly visible.)   |  |  |  |  |  |
| - N/A   |   |  |  |  |  |  |
|   |   |  |  |  |  |  |
|   |   |  |  |  |  |  |
| 6. Other Observations (Conf.                            | firm that repair/maintenance measures identified during prior inspection have been performed; note any other  |  |  |  |  |  |
| general observations, inclu                             | ding parcel-specific restoration activities.)   |  |  |  |  |  |
| <ul> <li>Elm trees were replaced No</li> </ul>          | ovember 2007.   |  |  |  |  |  |
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| III. FOLLOW-UP MAINTENANG                               | CE AND REPAIR ACTIVITIES  |  |  |  |  |  |
| - None  |   |  |  |  |  |  |
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#### FORMER OXBOW AREAS J AND K

#### PARCEL K10-11-1

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#### FORMER OXBOW AREAS J AND K

#### PARCEL K10-11-2

| I. GENERAL INFORMATION   |   |
|--|---|
|  |   |
| Inspection Date:   | 5/21/2008   |
| Conducted By/Phone Number:   | Gregg Rabasco/(413) 822-1184  |
| Weather Conditions:  | Mostly sunny - 60°F   |
| Date of Last Inspection:   | 10/16/2007  |
| 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  |
|  | y alternative plan proposed by GE) have been reviewed.  |
| - Confirmed  |   |
| 2. Soil Backfill Areas (Note a   | any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil   |
| erosion, surface water pond  | ding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage redges of paved areas, etc.)   |
| <ul> <li>N/A - subject to annual insp</li> </ul>   | pection 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], oth<br>tree stakes; review the rest<br>planted trees and shrubs; a | er landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and<br>oration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of<br>and measure and record the size of all trees and shrubs subject to inspection.)  |
| <ul> <li>Vegetative cover in good co</li> </ul>  |   |
|  | n Tables B-3, B-4, and B-5 in Attachment B:   |
| * All black willows in good of   |   |
| * One dead eastern cottony   |   |
| * One dead and one stresso   |   |
| including drainage outlets, of any erosion. Include, wh                                    | tible to Erosion (Inspect any other areas that are potentially subject to erosion as a result of the remediation, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence here relevant, an inspection of the riverbank areas lined with riprap following remediation activities on Parcels wrify the integrity of these structures.) |
| ·  | pection to be performed in August or September 2008.  |
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| Report, and note evidence  | spection (Inspect the paved area on Parcel K10-11-5 that is identified on Figure 3 of the Final Completion of any locations where the pavement is broken up and/or missing and soil is clearly visible.)  |
| - N/A  |   |
|  |   |
| •  | firm that repair/maintenance measures identified during prior inspection have been performed; note any other ding parcel-specific restoration activities.)  |
| - Tree guards were installed   | November 2007.  |
|  |   |
|  |   |
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|  |   |
| III. FOLLOW-UP MAINTENANC  |   |
| - Replace 1 dead eastern co  | ttonwood.   |
| - Replace 1 dead red maple.  |   |
| <ul> <li>Monitor stressed red maple</li> </ul>   | ·   |
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#### FORMER OXBOW AREAS J AND K

#### PARCEL K10-11-3

| Ŀ.  | GENERAL INFORMATION  |  |
|-----|--|--|
|     |  |  |
|     | spection Date:   | 5/21/2008  |
|     | anducted By/Phone Number:                                  | Gregg Rabasco/(413) 822-1184   |
|     | eather Conditions:<br>ate of Last Inspection:              | Mostly sunny - 60°F<br>10/16/2007  |
| Da  | ite of Last Inspection.                                    | 10/10/2007   |
| II. | INSPECTION SUMMARY   |  |
| 1.  |  | 4 from the Final Completion Report and the as-built survey drawing included in Appendix C of the Final by alternative plan proposed by GE) have been reviewed.   |
|     | Confirmed  |  |
|     |  |  |
| 2.  | erosion, surface water pon                                 | any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil ding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage or edges of paved areas, etc.)  |
|     | N/A - subject to annual insp                               | pection to be performed in August or September 2008.   |
|     |  |  |
|     |  |  |
|     |  |  |
| 3.  | stressed/sparse cover], off<br>tree stakes; review the res | y physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of ner landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and toration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of and measure and record the size of all trees and shrubs subject to inspection.) |
|     | Vegetative cover in good c                                 | ondition. (No trees/shrubs planted.)   |
|     |  |  |
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|     |  |  |
| 4.  | Arosa Detentially Sussen                                   | tible to Exercise //papaget any other areas that are notentially autient to areason as a result of the remodiation   |
| 4.  | including drainage outlets, of any erosion. Include, wi    | tible to Erosion (Inspect any other areas that are potentially subject to erosion as a result of the remediation, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence here relevant, an inspection of the riverbank areas lined with riprap following remediation activities on Parcels erify the integrity of these structures.)                        |
| -   |  | pection to be performed in August or September 2008.   |
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| _   | David Area Cubiast to In                                   | spection (Inspect the paved area on Parcel K10-11-5 that is identified on Figure 3 of the Final Completion   |
| 5.  |  | of any locations where the pavement is broken up and/or missing and soil is clearly visible.)  |
| -   | IV/A   |  |
|     |  |  |
| 6.  |  | firm that repair/maintenance measures identified during prior inspection have been performed; note any other<br>iding parcel-specific restoration activities.)   |
| -   | None   |  |
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| Ш   | FOLLOW-LIP MAINTENAN                                       | CE AND REPAIR ACTIVITIES   |
| _   | None   |  |
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#### FORMER OXBOW AREAS J AND K

#### **PARCEL K10-11-5**

#### I. GENERAL INFORMATION

Inspection Date: 5/21/2008

Conducted By/Phone Number: Gregg Rabasco/(413) 822-1184

Weather Conditions: Mostly sunny - 60°F

Date of Last Inspection: 10/16/2007

#### II. INSPECTION SUMMARY

- 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
- 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.)
- N/A 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 shrubs; and measure and record the size of all trees and shrubs subject to inspection.)
- Vegetative cover in good condition.
- Tree/shrub observations shown in Tables B-6 through B-9 in attachment B:
  - \* 23 choke cherries is good condition; 2 dead choke cherries observed but do not affect percent survival compared to original planted quantity, because total quantity observed (25) is greater than the original planted quantity (20) because five additional choke cherries were planted at the request of EPA.
  - \* Two dead and one stressed northern arrowwoods observed.
  - \* Three dead silky dogwoods observed.
  - \* One dead winterberry observed.
- 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 riverbank areas lined with riprap following remediation activities on Parcels K10-11-3 and K10-11-5; verify the integrity of these structures.)
- N/A subject to annual inspection to be performed in August or September 2008.
- 5. Paved Area Subject to Inspection (Inspect the paved area on Parcel K10-11-5 that is identified on Figure 3 of the Final Completion Report, and note evidence of any locations where the pavement is broken up and/or missing and soil is clearly visible.)
- N/A subject to annual inspection to be performed in August or September 2008.
- Other Observations (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.)
  - Shrub cages were removed November 2007.

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

- Replace 2 dead northern arrowwoods
- Monitor stressed northern arrowwood.
- Replace 3 dead silky dogwoods.
- Replace 1 dead winterberry.

#### ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

#### FORMER OXBOW AREAS J AND K

#### PARCEL K10-12-1

| l.   | GENERAL INFORMATION                           |  |
|--|---|--|
|  |   | 5/04/0000  |
|  | spection Date:                                | 5/21/2008<br>Crare Palaces (/442) 833 4494   |
| Conducted By/Phone Number: Weather Conditions: |   | Gregg Rabasco/(413) 822-1184   |
|  | eather Conditions:<br>ate of Last Inspection: | Mostly sunny- 60°F   |
| Da   | ate of Last Inspection.                       | 10/16/2007   |
| II.  | INSPECTION SUMMARY                            |  |
| 1.   | ũ .   | 4 from the Final Completion Report and the as-built survey drawing included in Appendix C of the Final   |
|  |   | ny alternative plan proposed by GE) have been reviewed.  |
| -  | Confirmed                                     |  |
| •  | Coil Bookfill Areas /Note                     | any physical changes since lest inspection; note suidence of any of the following; everyone cottlement, ceil   |
| 2.   |   | any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil ding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage |
|  |   | r edges of paved areas, etc.)  |
|  | N/A - subject to annual insp                  | pection to be performed in August or September 2008.   |
|  |   |  |
|  |   |  |
|  |   |  |
|  |   |  |
| 3.   |   | y physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of ner landscaping items [trees, shrubs, etc.] planted during restoration activities, tree quards, tree cages, and  |
|  |   | toration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of   |
|  |   | and measure and record the size of all trees and shrubs subject to inspection.)  |
|  | Vegetative cover in good c                    | ondition.  |
| -  | Tree observations shown in                    | n Tables B-10, B-11, and B-12 in Attachment B:   |
|  | * Both elms in good conditi                   | on.  |
|  |   | n good condition; 3 dead eastern cottonwoods observed but do not affect percent survival compared to   |
|  |   | because total quantity observed (18) is greater than original planted quantity (14) due to replanting  |
|  | of four eastern cottonwoo                     |  |
| 4.   |   | ood condition, but tree guard needs replacement.  Itible to Erosion (Inspect any other areas that are potentially subject to erosion as a result of the remediation,   |
| 7.   |   | drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence  |
|  |   | here relevant, an inspection of the riverbank areas lined with riprap following remediation activities on Parcels  |
|  |   | erify the integrity of these structures.)  |
| -  | N/A - subject to annual insp                  | pection to be performed in August or September 2008.   |
|  |   |  |
|  |   |  |
|  |   |  |
| 5.   | Paved Area Subject to In:                     | spection (Inspect the paved area on Parcel K10-11-5 that is identified on Figure 3 of the Final Completion   |
|  | Report, and note evidence                     | of any locations where the pavement is broken up and/or missing and soil is clearly visible.)  |
| -  | N/A   |  |
|  |   |  |
| 6.   | Other Observations (Con                       | firm that repair/maintenance measures identified during prior inspection have been performed; note any other   |
| Ο.   | •   | iding parcel-specific restoration activities.)   |
| -  |   | were replaced in November 2007.  |
|  |   |  |
|  |   |  |
|  |   |  |
|  |   |  |
| III.   |   | CE AND REPAIR ACTIVITIES   |
| -  | Replace tree guard around                     | white ash tree.  |
|  |   |  |
|  |   |  |
|  |   |  |
|  |   |  |

#### FORMER OXBOW AREAS J AND K

#### PARCEL K10-13-1

|   | PAROLL RIV-13-1  |
|---|--|
| I. GENERAL INFORMATION                                      |  |
|   |  |
| Inspection Date:  | 5/21/2008  |
| Conducted By/Phone Number:                                  | Gregg Rabasco/(413) 822-1184   |
| Weather Conditions:   | Mostly sunny - 60°F  |
| Date of Last Inspection:                                    | 10/16/2007   |
| II. INSPECTION SUMMARY                                      |  |
|   | 4 from the Final Completion Report and the as-built survey drawing included in Appendix C of the Final   |
|   | y alternative plan proposed by GE) have been reviewed.   |
| - Confirmed   |  |
| erosion, surface water pond                                 | any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil ding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, erosion around drainage redges of paved areas, etc.)  |
| <ul> <li>N/A - subject to annual insp</li> </ul>            | pection to be performed in August or September 2008.   |
|   |  |
|   |  |
|   |  |
| stressed/sparse cover], oth<br>tree stakes; review the rest | y physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of er landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and oration planting plan [Figure 4 of the Final Completion Report] and determine the percent survivorship of and measure and record the size of all trees and shrubs subject to inspection.) |
| <ul> <li>Vegetative cover in good co</li> </ul>             | ondition. (No trees/shrubs planted.)   |
|   |  |
|   |  |
|   |  |
| 4 4 5 6 6 11 6  |  |
| including drainage outlets, of any erosion. Include, wh     | tible to Erosion (Inspect any other areas that are potentially subject to erosion as a result of the remediation, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence here relevant, an inspection of the riverbank areas lined with riprap following remediation activities on Parcels parify the integrity of these structures.)                     |
|   | pection to be performed in August or September 2008.   |
|   |  |
|   |  |
|   |  |
|   |  |
| Report, and note evidence                                   | spection (Inspect the paved area on Parcel K10-11-5 that is identified on Figure 3 of the Final Completion of any locations where the pavement is broken up and/or missing and soil is clearly visible.)   |
| - N/A   |  |
|   |  |
|   | firm that repair/maintenance measures identified during prior inspection have been performed; note any other ding parcel-specific restoration activities.)   |
| - None  |  |
|   |  |
|   |  |
|   |  |
|   |  |
| III. FOLLOW-UP MAINTENANG                                   | E AND REPAIR ACTIVITIES  |
| - None  |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |

### **ARCADIS**

#### Attachment B

Documentation of Tree/Shrub Observations

### TABLE B-1 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-10-6 - AMERICAN ELM (ULNUS AMERICANA)

| Tree/Shrub | Height (ft.) | Condition of Tree | Condition of Tree Cage, Guard, and Stakes (where present) |
|------------|--------------|-------------------|---|
| 1          | NA           | Dead              | NA  |
| 2          | 5            | Good              | NA  |
| 3          | 4            | Good              | NA  |
| 4          | 5            | Good              | NA  |
| 5          | 4            | Good              | NA  |
| 6          | 4            | Good              | NA  |
| 7          | 4            | Good              | NA  |
| 8          | 5            | Good              | NA  |
| 9          | 4            | Good              | NA  |
| 10         | 5            | Good              | NA  |

| Average Height (ft.): | 4.4 |
|-----------------------|-----|
| Height Range (ft.):   | 4-5 |
| Total Tree Count:     | 10  |

## TABLE B-2 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-10-6 - EASTERN HEMLOCK (TSUGA CANADENSIS)

| Tree/Shrub | Height (ft.) | Condition of Tree | Condition of Tree Cage, Guard, and Stakes (where present) |
|------------|--------------|-------------------|---|
| 1          | 5            | Good              | NA  |
| 2          | 5            | Good              | NA  |
| 3          | 6            | Good              | NA  |
| 4          | 6            | Good              | NA  |

| Average Height (ft.): | 5.5 |
|-----------------------|-----|
| Height Range (ft.):   | 5-6 |
| Total Tree Count:     | 4   |

### TABLE B-3 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-2 - BLACK WILLOW (SALIX NIGRA)

| Tree/Shrub | Height (ft.) | Condition of Tree | Condition of Tree Cage, Guard, and Stakes (where present) |
|------------|--------------|-------------------|---|
| 1          | 6            | Good              | Good  |
| 2          | 5            | Good              | Good  |
| 3          | 4            | Good              | Good  |
| 4          | 7            | Good              | Good  |
| 5          | 6            | Good              | Good  |
| 6          | 8            | Good              | Good  |
| 7          | 5            | Good              | Good  |
| 8          | 6            | Good              | Good  |
| 9          | 5            | Good              | Good  |
| 10         | 5            | Good              | Good  |

| Average Height (ft.): | 5.7 |
|-----------------------|-----|
| Height Range (ft.):   | 4-8 |
| Total Tree Count:     | 10  |

### TABLE B-4 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-2 - EASTERN COTTONWOOD (POPULUS DELTOIDES)

| Tree/Shrub | Height (ft.) | Condition of Tree | Condition of Tree Cage, Guard,<br>and Stakes (where present) |
|------------|--------------|-------------------|--|
| 1          | 9            | Good              | Good   |
| 2          | 10           | Good              | Good   |
| 3          | 10           | Good              | Good   |
| 4          | 8            | Good              | Good   |
| 5          | 11           | Good              | Good   |
| 6          | 10           | Good              | Good   |
| 7          | 11           | Good              | Good   |
| 8          | 9            | Good              | Good   |
| 9          | NA           | Dead              | NA   |

| Average Height (ft.): | 9.8  |
|-----------------------|------|
| Height Range (ft.):   | 8-11 |
| Total Tree Count:     | 9    |

### TABLE B-5 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-2 - RED MAPLE (ACER RUBRUM)

| Tree/Shrub | Height (ft.) | Condition of Tree | Condition of Tree Cage, Guard, and Stakes (where present) |
|------------|--------------|-------------------|---|
| 1          | 2            | Stressed          | Good  |
| 2          | NA           | Dead              | NA  |

| Average Height (ft.): | 2 |
|-----------------------|---|
| Height Range (ft.):   |   |
| Total Tree Count:     | 2 |

## TABLE B-6 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-5 - CHOKE CHERRY (ARONIA MELANOCARPA)

| Tree/Shrub | Height (ft.) | Condition of Shrub | Condition of Tree Cage, Guard, and Stakes (where present) |
|------------|--------------|--------------------|---|
| 1          | 4            | Good               | NA  |
| 2          | 4            | Good               | NA  |
| 3          | 5            | Good               | NA  |
| 4          | 4            | Good               | NA  |
| 5          | 3            | Good               | NA  |
| 6          | 4            | Good               | NA  |
| 7          | 1            | Good               | Good  |
| 8          | 2            | Good               | NA  |
| 9          | 2            | Good               | NA  |
| 10         | 1            | Good               | Good  |
| 11         | 1            | Good               | NA  |
| 12         | 1            | Good               | Good  |
| 13         | 2            | Good               | NA  |
| 14         | 1            | Good               | NA  |
| 15         | 1            | Good               | NA  |
| 16         | 1            | Good               | Good  |
| 17         | 1            | Good               | NA  |
| 18         | 2            | Good               | NA  |
| 19         | 2            | Good               | NA  |
| 20         | 1            | Good               | NA  |
| 21         | 1            | Good               | NA  |
| 22         | 1            | Good               | NA  |
| 23         | 1            | Good               | NA  |
| 24         | NA           | Dead               | NA  |
| 25         | NA           | Dead               | NA  |

| Average Height (ft.): | 2.0 |
|-----------------------|-----|
| Height Range (ft.):   | 1-5 |
| Total Shrub Count:    | 25  |

### TABLE B-7 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-5 - NORTHERN ARROWWOOD (VIBURNUM DENTATUM,

| Tree/Shrub | Height (ft.) | Condition of Shrub | Condition of Tree Cage, Guard, and Stakes (where present) |
|------------|--------------|--------------------|---|
| 1          | 4            | Good               | Good  |
| 2          | 4            | Good               | NA  |
| 3          | 4            | Good               | Good  |
| 4          | 4            | Good               | Good  |
| 5          | 3            | Good               | NA  |
| 6          | 4            | Good               | Good  |
| 7          | 4            | Good               | NA  |
| 8          | 3            | Good               | Good  |
| 9          | 4            | Good               | NA  |
| 10         | 3            | Good               | Good  |
| 11         | 4            | Good               | Good  |
| 12         | 4            | Good               | NA  |
| 13         | 4            | Good               | NA  |
| 14         | NA           | Dead               | NA  |
| 15         | 4            | Stressed           | NA  |
| 16         | NA           | Dead               | NA  |
| 17         | 3            | Good               | NA  |
| 18         | 4            | Good               | NA  |
| 19         | 5            | Good               | NA  |
| 20         | 4            | Good               | NA  |

| Average Height (ft.): | 3.8 |
|-----------------------|-----|
| Height Range (ft.):   | 3-5 |
| Total Shrub Count:    | 20  |

## TABLE B-8 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-5 - SILKY DOGWOOD (CORNUS AMOMUM)

| Tree/Shrub | Height (ft.) | Condition of Shrub | Condition of Tree Cage, Guard, and Stakes (where present) |
|------------|--------------|--------------------|---|
| 1          | NA           | Dead               | NA  |
| 2          | 4            | Good               | NA  |
| 3          | 4            | Good               | Good  |
| 4          | 2            | Good               | Good  |
| 5          | 3            | Good               | NA  |
| 6          | 4            | Good               | Good  |
| 7          | 3            | Good               | NA  |
| 8          | 3            | Good               | Good  |
| 9          | 3            | Good               | NA  |
| 10         | 2            | Good               | Good  |
| 11         | 3            | Good               | Good  |
| 12         | 2            | Good               | NA  |
| 13         | 4            | Good               | NA  |
| 14         | 3            | Good               | NA  |
| 15         | 3            | Good               | NA  |
| 16         | 3            | Good               | NA  |
| 17         | 2            | Good               | NA  |
| 18         | NA           | Dead               | NA  |
| 19         | 2            | Good               | NA  |
| 20         | NA           | Dead               | NA  |

| Average Height (ft.): | 2.9 |
|-----------------------|-----|
| Height Range (ft.):   |     |
| Total Shrub Count:    | 20  |

### TABLE B-9 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-11-5 - WINTERBERRY (ILEX VERTICILLATA)

| Tree/Shrub | Height (ft.) | Condition of Shrub | Condition of Tree Cage, Guard, and Stakes (where present) |
|------------|--------------|--------------------|---|
| 1          | 2            | Good               | Good  |
| 2          | 4            | Good               | NA  |
| 3          | 3            | Good               | NA  |
| 4          | 3            | Good               | Good  |
| 5          | 3            | Good               | NA  |
| 6          | 2            | Good               | Good  |
| 7          | 3            | Good               | NA  |
| 8          | 3            | Good               | NA  |
| 9          | 3            | Good               | NA  |
| 10         | 3            | Good               | Good  |
| 11         | 3            | Good               | Good  |
| 12         | 3            | Good               | NA  |
| 13         | 2            | Good               | NA  |
| 14         | 3            | Good               | NA  |
| 15         | 3            | Good               | NA  |
| 16         | 3            | Good               | NA  |
| 17         | 1            | Good               | NA  |
| 18         | 3            | Good               | NA  |
| 19         | 3            | Good               | NA  |
| 20         | NA           | Dead               | NA  |

| Average Height (ft.): | 2.8 |
|-----------------------|-----|
| Height Range (ft.):   | 1-4 |
| Total Shrub Count:    | 20  |

### TABLE B-10 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-12-1 - AMERICAN ELM (ULNUS AMERICANA)

| Tree/Shrub | Height (ft.) | Condition of Tree | Condition of Tree Cage, Guard, and Stakes (where present) |
|------------|--------------|-------------------|---|
| 1          | 5            | Good              | NA  |
| 2          | 2            | Good              | Good  |

| Average Height (ft.): | 3.5 |
|-----------------------|-----|
| Height Range (ft.):   | 2-5 |
| Total Tree Count:     | 2   |

### TABLE B-11 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-12-1 - EASTERN COTTONWOOD (POPULUS DELTOIDES)

| Tree/Shrub | Height (ft.) | Condition of Tree | Condition of Tree Cage, Guard, and Stakes (where present) |
|------------|--------------|-------------------|---|
| 1          | 12           | Good              | Good  |
| 2          | 11           | Good              | Good  |
| 3          | 3            | Good              | Good  |
| 4          | 6            | Good              | Good  |
| 5          | 7            | Good              | Good  |
| 6          | 10           | Good              | Good  |
| 7          | 6            | Good              | Good  |
| 8          | 5            | Good              | Good  |
| 9          | NA           | Dead              | NA  |
| 10         | 10           | Good              | Good  |
| 11         | 4            | Good              | Good  |
| 12         | 11           | Good              | Good  |
| 13         | NA           | Dead              | NA  |
| 14         | 11           | Good              | Good  |
| 15         | 10           | Good              | Good  |
| 16         | 10           | Good              | Good  |
| 17         | 5            | Good              | Good  |
| 18         | NA           | Dead              | NA  |

| Average Height (ft.): | 8.1  |
|-----------------------|------|
| Height Range (ft.):   | 3-12 |
| Total Tree Count:     | 18   |

#### TABLE B-12 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL K10-12-1 - WHITE ASH (FRAXINUS AMERICANA)

| Tree/Shrub | Height (ft.) | Condition of Tree | Condition of Tree Cage, Guard, and Stakes (where present) |
|------------|--------------|-------------------|---|
| 1          | 3            | Good              | Needs replacement   |

| Average Height (ft.): | 3 |
|-----------------------|---|
| Height Range (ft.):   |   |
| Total Tree Count:     | 1 |