



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

July 11, 2007

Mr. Dean Tagliaferro
EPA Project Manager
United States Environmental Protection Agency
c/o Weston Solutions, Inc.
10 Lyman Street
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
Lyman Street Area (GECD430)
Summary of May 2007 Inspection Activities**

Dear Mr. Tagliaferro:

On May 29, 2007, the General Electric Company (GE) performed its second post-remediation inspection of the properties located within the Lyman Street Area, west of Lyman Street, at which remediation activities have been performed. As shown on Figure 1, the Lyman Street Area includes six commercial parcels (four of which, Parcels I9-4-14, -19, -25, and -203, have recreational portions) and two recreational parcels. In accordance with GE's *Final Removal Design/Removal Action Work Plan for Lyman Street Area* (Final RD/RA Work Plan), which was submitted to the U.S. Environmental Protection Agency (EPA) in September 2005 and conditionally approved by EPA on March 6, 2006, GE conducted remediation actions at the six properties west of Lyman Street in 2006, completing those actions in September 2006. (Remediation activities for the properties east of Lyman Street are anticipated to be performed this summer.) In addition, vegetation restoration activities were conducted at two of these parcels (Parcels I9-4-14 and I9-4-19), as described in the revised Vegetation Restoration Plan for Lyman Street Area (west of Lyman Street) provided in Attachment 3 to GE's October 5, 2006 Addendum to Supplemental Information Package.

GE conducted the initial post-remediation inspection of these properties on November 29, 2006. A summary of the November 2006 inspection activities was submitted to EPA in a letter dated January 3, 2007. On May 29, 2007, GE conducted the second post-remediation inspection of these properties in accordance with the Post-Removal Site Control/Restoration Project Monitoring and Maintenance Plan contained in Attachment F to the Final RD/RA Work Plan, as revised and set forth in Attachment H to an April 4, 2006 Addendum to the Final RD/RA Work Plan, which was approved by EPA on April 13, 2006. Consistent with the initial inspection, this inspection was performed for areas that were backfilled and restored during implementation of the remediation actions.

Summary of Inspection Activities

The May 2007 inspection consisted of visual observations of the backfilled/restored areas, focusing on the following: (a) any areas where excessive settlement has occurred relative to the surrounding areas; (b) any drainage or growth problems due to possible over-compaction of the backfill materials; (c) in areas where vegetation has been established, the condition of the vegetation, including any evidence of stressed vegetation or sparse cover; and (d) other conditions that could jeopardize the performance of the completed remediation actions. The inspection also evaluated whether the vegetation that has been planted is growing as anticipated.

The May 2007 inspection also included observations of properties at which the need for follow-up activities had been identified during the prior inspection. As indicated in GE's January 3, 2007 report related to the November 2006 inspection, the only such areas were located within Parcel I9-4-19 (erosion was observed on the top of bank along the Housatonic River) and Parcel I9-4-201 (a fence collar needed repair). Since that time, the fence collar has been repaired and the eroded area at Parcel I9-4-19 was filled with topsoil and seeded. In addition, the remaining restoration activities identified in the January 3, 2007 report (i.e., tree installation at Parcel I9-4-14 and painting the parking lot lines at Parcels I9-4-25/202) have been completed.

To document the results of the May 2007 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.

Summary of Observations During Inspection

In summary, as indicated on the attached forms, the May 2007 results indicated that the inspected properties at the Lyman Street Area were in good overall condition, with a couple of minor maintenance actions necessary. Specifically, the inspection identified the need for the following:

- Replant 5 box elders that were below 6- to 8-feet tall on Parcel I9-4-14;
- Repair erosion previously identified on Parcel I9-4-19; and
- Ensure sod is adequately watered on Parcel I9-4-201.

As previously mentioned, the erosion on Parcel I9-4-19 has been addressed. The remaining maintenance activities will be conducted prior to the fall 2007 inspection.

Schedule for Future Inspections

In accordance with the above-referenced Post-Removal Site Control/Restoration Project Monitoring and Maintenance Plan, the backfilled/restored areas at the above properties west of Lyman Street will be inspected every six months for a period of one year and annually thereafter (subject to subsequent EPA approval of a different frequency). Future inspections are anticipated to occur in fall 2007 and annually thereafter. 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 Gates / EGB

Richard W. Gates
Remediation Project Manager

Attachments

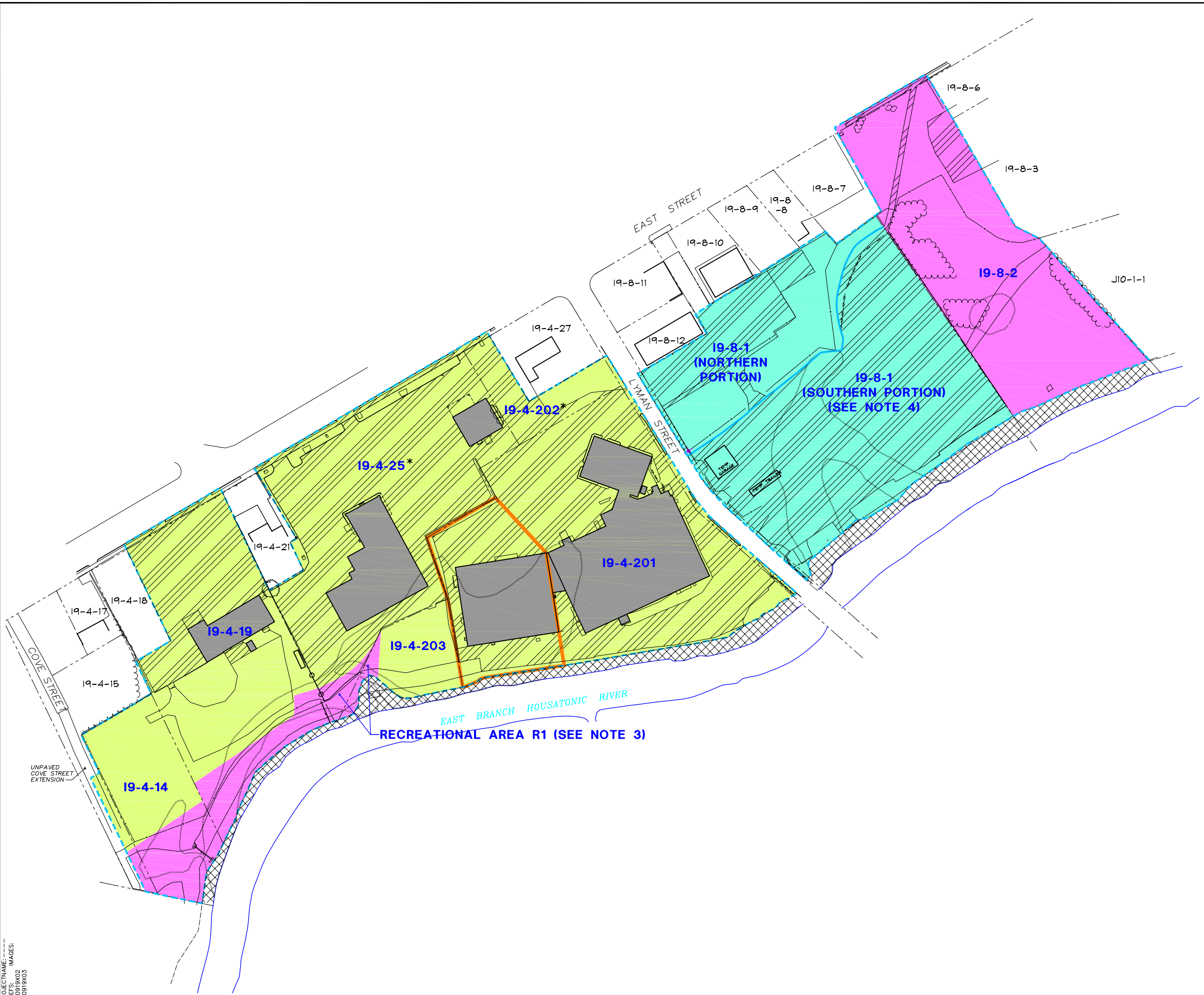
cc: Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA*
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Jane Rothchild, MDEP*
Anna Symington, MDEP*
Nancy E. Harper, MA AG
Dale Young, MA EOE*
Linda Palmieri, Weston (2 copies)
Mayor James Ruberto, City of Pittsfield

Michael Carroll, GE*
Roderic McLaren, GE*
Peter Wojcik, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter
Property Owner -- Parcels I9-4-25/202 & I9-4-203
Property Owner -- Parcels I9-4-14 & I9-4-19
Property Owner -- Parcel I9-4-201
Public Information Repositories
GE Internal Repository

** cover letter only*

Figure

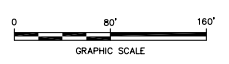
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 PROJECT NAME: 20919X02
 PAGES: IMAGES: 20919X03



LEGEND

- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- 19-8-1** PARCEL ID
- GUARD RAIL
- CHAIN LINK FENCE
- WOODEN FENCE
- FORMER OXBOW/LOW LYING AREA
- BUILDING
- PAVED AREA
- AREA ADDRESSED AS PART OF 1/2-MILE REACH REMOVAL ACTION OR 1 1/2-MILE REACH REMOVAL ACTION
- RECREATIONAL PROPERTY (GE OWNED)
- RECREATIONAL AREA (NON-GE OWNED)
- COMMERCIAL AREA (NON-GE OWNED)
- SUB-AREA 201A (SUBJECT TO SAMPLING ON RESIDENTIAL-AREA GRID)
- DIVIDING LINE SEPARATING THE NORTHERN PORTION OF 19-8-1 FROM THE SOUTHERN PORTION

- FIGURE NOTES:**
1. MAPPING IS BASED ON SITE SURVEY BY HILL ENGINEERS, ARCHITECTS & PLANNERS INC., DATED 2/5/04 AND FROM AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOW IN APRIL 1990 (EDGE OF RIVER).
 2. * = PARCEL 19-4-25 (COMMERCIAL PORTION) AND 19-4-202, WHICH ARE UNDER COMMON OWNERSHIP, WERE CONSIDERED AS A SINGLE AVERAGING AREA FOR RD/RA EVALUATIONS
 3. R1 AVERAGING AREA CONSISTS OF THE RECREATIONAL PORTIONS OF PARCELS 19-4-25 AND 19-4-203.
 4. EVALUATIONS WERE NOT PERFORMED ON THE SOUTHERN PORTION OF PARCEL 19-8-1. THIS AREA WILL BE SUBJECT TO INSTALLATION OF A VEGETATIVE ENGINEERED BARRIER AND NATURAL RESOURCE RESTORATION AND ENHANCEMENT ACTIVITIES.



GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
MAY 2007 INSPECTION

SITE PLAN

FIGURE

1

Attachment A

Inspection Summary and
Checklist

INSPECTION SUMMARY AND CHECKLIST

LYMAN STREET AREA

PARCEL I9-4-14

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/29/2006

II. INSPECTION SUMMARY

1. **Vegetative Engineered Barriers** (Note any physical changes since last inspection; note evidence of any of the following: soil cover erosion, areas of bare/sparse vegetation, uneven settlement, surface water ponding, burrows, vehicle ruts; exposed synthetic cover components; proper functioning of water management features; unauthorized excavation; unauthorized uses of areas, etc.)

- NA

2. **Other Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, etc.)

- All areas in good condition.

3. **Other Vegetation Areas** (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.)

- Five box elder plantings are below the 6- to 8-foot requirement.

4. **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

- Plant five 6- to 8-foot tall box elders.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

LYMAN STREET AREA

PARCEL I9-4-19

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/29/2006

II. INSPECTION SUMMARY

1. **Vegetative Engineered Barriers** (Note any physical changes since last inspection; note evidence of any of the following: soil cover erosion, areas of bare/sparse vegetation, uneven settlement, surface water ponding, burrows, vehicle ruts; exposed synthetic cover components; proper functioning of water management features; unauthorized excavation; unauthorized uses of areas, etc.)

- NA

2. **Other Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, etc.)

- Erosion observed at top-of-bank.

3. **Other Vegetation Areas** (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.))

- None

4. **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

- Repair top-of-bank erosion.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

LYMAN STREET AREA

PARCEL I9-4-25/202

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/29/2006

II. INSPECTION SUMMARY

1. **Vegetative Engineered Barriers** (Note any physical changes since last inspection; note evidence of any of the following: soil cover erosion, areas of bare/sparse vegetation, uneven settlement, surface water ponding, burrows, vehicle ruts; exposed synthetic cover components; proper functioning of water management features; unauthorized excavation; unauthorized uses of areas, etc.)

- NA

2. **Other Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, etc.)

- All areas in good condition.

3. **Other Vegetation Areas** (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.

4. **Other Observations** (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including parcel-specific restoration activities.

- Fence collar has been repaired.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

LYMAN STREET AREA

PARCEL I9-4-201

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/29/2006

II. INSPECTION SUMMARY

1. **Vegetative Engineered Barriers** *(Note any physical changes since last inspection; note evidence of any of the following: soil cover erosion, areas of bare/sparse vegetation, uneven settlement, surface water ponding, burrows, vehicle ruts; exposed synthetic cover components; proper functioning of water management features; unauthorized excavation; unauthorized uses of areas, etc.)*

- NA

2. **Other Soil Backfill Areas** *(Note any physical changes since last inspection; note evidence of excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, etc.)*

- All areas in good condition.

3. **Other Vegetation Areas** *(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.)*

- Sod is stressed.

4. **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

- Ensure regular watering of sod.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

INSPECTION SUMMARY AND CHECKLIST

LYMAN STREET AREA

PARCEL I9-4-203

I. GENERAL INFORMATION

Inspection Date: 5/29/2007
Conducted By: Paolo Filippetti
Weather Conditions: Sunny - 82°F
Date of Last Inspection: 11/29/2006

II. INSPECTION SUMMARY

1. **Vegetative Engineered Barriers** (Note any physical changes since last inspection; note evidence of any of the following: soil cover erosion, areas of bare/sparse vegetation, uneven settlement, surface water ponding, burrows, vehicle ruts; exposed synthetic cover components; proper functioning of water management features; unauthorized excavation; unauthorized uses of areas, etc.)

- NA

2. **Other Soil Backfill Areas** (Note any physical changes since last inspection; note evidence of excessive settlement, soil erosion, surface water ponding, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, etc.)

- All areas in good condition.

3. **Other Vegetation Areas** (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.

4. **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