



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted via Overnight Courier*

December 13, 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  
Lyman Street Area (GECD430)  
Summary of December 2007 Inspection Activities**

Dear Mr. Tagliaferro:

On December 6, 2007, the General Electric Company (GE) performed the initial post-remediation inspection of the two properties located within the Lyman Street Area east of Lyman Street at which remediation activities were completed in November 2007. These properties are Parcels I9-8-1 and I9-8-2 (shown on Figure 1).

The post-remediation inspection of these properties was conducted in accordance with the requirements of the Post-Removal Site Control/Restoration Project Monitoring and Maintenance Plan contained in Attachment F to the *Final Removal Design/Remedial Action Work Plan for Lyman Street Area* (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. The inspection focused on the areas where engineered barriers were installed and areas that were backfilled and restored during the implementation of the remediation actions. The latter included the areas where planting activities were conducted at Parcel I9-8-2, as described in the Remediation Planting Plan provided in Attachment C to GE's March 29, 2007 Supplemental Information Package. In addition, natural resource restoration/enhancement (NRRE) activities were conducted at the vegetative engineered barrier in the former GE Lyman Street parking lot in the southern portion of Parcel I9-8-1 and over the unpaved part of the northern portion of that property. However, the initial post-remediation inspection was not required to specifically evaluate those NRRE areas.

### **Summary of Inspection Activities**

The December 2007 inspection included observations of the engineered barrier surfaces to observe the general condition of these areas. Specifically, the vegetative engineered barrier was visually inspected for the following conditions as they would affect the integrity of the barrier: (a) evidence of topsoil erosion; (b) establishment and coverage of vegetation (e.g., bare or sparsely vegetated areas); (c) deficiencies in the soil layer overlying the synthetic cover components (e.g., excessive erosion, surface water ponding, depressions, exposed synthetic cover components, vehicle ruts, or other abnormalities); (d) the damage to synthetic cover components; (e) uneven settlement relative to surrounding areas; (f) the proper functioning of any associated surface water diversions; and (g) overall integrity (including animal burrows, unauthorized excavation, or other conditions that could jeopardize the integrity of the barriers).

In addition, the December 2007 inspection included 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 results of the December 2007 inspection are included in an Inspection Summary and Checklist for each property subject to inspection (Attachment A).

### **Summary of Observations During Inspection**

As indicated on the forms in Attachment A, the December 2007 inspection identified several conditions, particularly at Parcel I9-8-1, that require maintenance and repair. Specifically, at Parcel I9-8-1, the inspection identified the need for the following maintenance/repair activities:

- Installation of an erosion control mat in the main swale, followed by seeding of that area;
- Repair of an eroded area along the Lyman Street fence line;
- Installation of topsoil between the fence and sidewalk along Lyman Street, followed by seeding of that areas;
- Removal of stockpiled vines and tree branches observed along the boundary with Parcel I9-8-10;
- Removal of the oil boom along the riverbank; and
- Removal of the silt fence and haybales along the riverbank and implementation of steps to address accumulated run-off once the herbaceous cover is established.

The above-referenced maintenance activities will be addressed prior to the Spring 2008 inspection. In addition, the inspection identified the need for inspection and potential removal of invasive species in the NRRE area at Parcel I9-8-1 and for the monitoring of the herbaceous cover at both Parcels I9-8-1 and I9-8-2. These activities will be performed in the Spring 2008 inspection.

### **Schedule for Future Inspections**

The above-referenced Post-Removal Site Control/Restoration Project Monitoring and Maintenance Plan requires that the engineered barrier area be inspected approximately every 6 months (unless and until EPA approves an alternative frequency) to assess the integrity of the barriers, and that the backfilled/restored areas be inspected two times per year in 2008 and annually thereafter (subject to EPA approval of a different frequency), as well as after severe storms. Additionally, in accordance with Attachment J to the *Statement of Work for Removal Actions Outside the River* (SOW), the newly planted vegetation is to be inspected twice a year for a two-year period to assess the condition of the vegetation. Further, as noted in the above-referenced Post-Removal Site Control/Restoration Project Monitoring and Maintenance Plan, the NRRE plantings and structures at Parcel I9-8-1 are required to be inspected at the frequencies specified in Attachment I to the SOW, which are to begin in the year after planting.

GE is currently developing a Final Completion Report for the Lyman Street Area Removal Action, which will include a final Post-Removal Site Control Plan and a final Restoration Project Monitoring and Maintenance Plan. GE is also developing a Completion of Installation of Restoration Work Report for the NRRE activities (in accordance with Paragraph 120 of the Consent Decree), which will include or reference the final Restoration Project Monitoring and Maintenance Plan. These plans are anticipated to include the inspection activities and frequencies specified above, with any modifications agreed to by GE and EPA (and, for the NRRE activities, the Natural Resource Trustees).

GE will conduct future inspections of the remediated areas at these properties (i.e., the engineered barrier area, the backfilled/restored areas, and the re-vegetated areas at Parcel I9-8-2) at the frequencies specified above, with any modifications specified in the approved Post-Removal Site Control Plan. The next such inspection is scheduled for May 2008. These inspections will utilize the Inspection Summary and Checklist forms included herein or any modified version included in the final Post-Removal Site Control Plan. Within 30 days following each inspection, an inspection report will be prepared and submitted to EPA. In addition, the NRRE plantings and structures at Parcel I9-8-1 will be inspected at the frequencies required by Attachment I to the SOW (as set forth in GE's current Post-Removal Site Control/Restoration Project Monitoring and Maintenance Plan), with any modifications specified in the final Restoration Project Monitoring and Maintenance Plan. The first such inspection is scheduled for May 2008. These inspections will utilize an appropriate Inspection Summary and Checklist form (to be included in the final Restoration Project Monitoring and Maintenance Plan), and event-specific inspection reports will be submitted to the Natural Resource Trustees, with copies to EPA and the Massachusetts Department of Environmental Protection.

Please call me if you have any comments or questions.

Sincerely

Richard W. Gates / EGB

Richard W. Gates  
Remediation Project Manager

#### Attachments

cc: Tim Conway, EPA  
John Kilborn, 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 EOEA\*  
Linda Palmieri, Weston (2 copies)  
Mayor James Ruberto, City of Pittsfield

Michael Carroll, GE\*  
Andrew Silber, GE  
Roderic McLaren, GE\*  
Peter Wojcik, GE\*  
James Nuss, ARCADIS BBL  
James Bieke, Goodwin Procter LLP  
Property Owner – Parcels I9-8-1  
Property Owner – Parcel I9-8-2  
Public Information Repositories  
GE Internal Repository

\* cover letter only

**Figure**

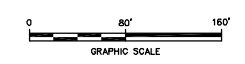
SVR-85-DNW-LAF LAYER: ON=1, OFF=REF\*  
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 PROJECTNAME: 30919X02  
 XREFS: IMAGES: 30919X03



**LEGEND**

- APPROXIMATE RAA BOUNDARY
- PARCEL BOUNDARY
- 19-8-1** PARCEL ID
- GUARD RAIL
- CHAIN LINK FENCE
- WOODEN FENCE
- FORMER OXBOW/LOW LYING AREA
- BUILDING
- AREA ADDRESSED AS PART OF 1/2-MILE REACH REMOVAL ACTION OR 1 1/2-MILE REACH REMOVAL ACTION
- AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT
- AREA SUBJECT TO INSTALLATION OF VEGETATIVE ENGINEERED BARRIER AND NATURAL RESOURCE RESTORATION/ENHANCEMENT
- 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. - FLOWN 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 WAS SUBJECT TO INSTALLATION OF A VEGETATIVE ENGINEERED BARRIER AND NATURAL RESOURCE RESTORATION AND ENHANCEMENT ACTIVITIES.



GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**DECEMBER 2007 INSPECTION**

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**SITE PLAN**

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Infrastructure, environment, facilities

FIGURE

1

**Attachment A**

Completed Inspection Forms

**INSPECTION SUMMARY AND CHECKLIST**

**LYMAN STREET AREA**

**PARCEL I9-8-1**

**I. GENERAL INFORMATION**

Inspection Date: 12/6/2007  
Conducted By: Paolo Filippetti  
Weather Conditions: Sunny - 25°F  
Date of Last Inspection: NA

**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.)*

- Erosion control mat has not been installed in main swale. Subsequent to installation of the erosion control mat, area should be seeded.
- Erosion observed along Lyman Street fence line.
- Topsoil should be placed between fence and sidewalk along Lyman Street and area should be seeded.

**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.)*

- Silt fence and haybales should be removed along riverbank after herbaceous cover is established.
- Sand/silt run-off has accumulated along silt fence and haybales east of the drainage swale. To be addressed when silt fence and haybales along riverbank are removed.

**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.)*

- Oil boom along riverbank should be removed.
- Knotweed observed along Parcels I9-8-7, -8, and -9 which may be subject to removal in accordance with the NRRE requirements (Technical Attachment I to the SOW). Area to be inspected in spring 2008.
- Vines and tree branches cut during fence installation are staged along Parcel I9-8-10 (should be removed).

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

- Install erosion control mat in the main swale and seed area.
- Repair eroded area along the Lyman Street fence line.
- Install topsoil between the fence and sidewalk along Lyman Street and seed area.
- Remove stockpiled vines and tree branches observed along the boundary with Parcel I9-8-10.
- Remove oil boom along the riverbank.
- Remove silt fence and haybales along riverbank and address accumulated run-off once herbaceous cover is established.
- Inspect knotweed (and other invasive plants) during NRRE inspection in spring 2008.
- Monitor herbaceous cover in spring 2008.

**ATTACH ADDITIONAL INFORMATION AS APPROPRIATE**

**INSPECTION SUMMARY AND CHECKLIST**

**LYMAN STREET AREA**

**PARCEL I9-8-2**

**I. GENERAL INFORMATION**

Inspection Date: 12/6/2007  
Conducted By: Paolo Filippetti  
Weather Conditions: Sunny - 25°F  
Date of Last Inspection: NA

**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.))

- Several areas, including former access road, do not appear to have been seeded. Additional seeding may be required in spring 2008.

**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**

- Monitor herbaceous cover in spring 2008.

**ATTACH ADDITIONAL INFORMATION AS APPROPRIATE**