



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted via Overnight Courier*

June 5, 2007

Ms. Dale C. Young  
Lead Administrative Trustee  
Massachusetts Executive Office of Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, Massachusetts 02114-2119

**Re: GE-Pittsfield/Housatonic River Site  
Newell Street Area II (GEC450)  
Completion of Installation of Restoration Work Report**

Dear Ms. Young:

On March 3, 2005, the General Electric Company (GE) submitted a document titled *Final Removal Design/Removal Action Work Plan for Newell Street Area II* (Final Work Plan) to the U.S. Environmental Protection Agency (EPA). Section 5.7 of the Final Work Plan summarized the natural resource restoration/enhancement activities that GE proposed to implement within portions of the Newell Street Area II Removal Action Area (RAA) in accordance with the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site (the Site) and associated *Statement of Work for Removal Actions Outside the River* (SOW). Additional details related to the natural resource restoration/enhancement activities for Newell Street Area II, including a *Restoration Project Monitoring and Maintenance Plan*, were provided in a May 25, 2005 document titled *Final RD/RA Work Plan Addendum for Newell Street Area II* (Addendum). The Final Work Plan and Addendum were conditionally approved by EPA in letters to GE dated May 12 and June 9, 2005, respectively. The above-referenced documents were also provided to the Natural Resource Trustees for the Site (Trustees) for review and comment. Trustee comments were provided to GE in letters dated April 25 and June 10, 2005. GE subsequently performed the EPA-approved Removal Action between July 2005 and June 2006.

In accordance with Paragraph 120 of the CD, GE has prepared this *Completion of Installation of Restoration Work Report*, which summarizes the natural resource restoration/enhancement measures installed as part of the Newell Street Area II Removal Action. This letter report describes the pertinent Performance Standards applicable to Newell Street Area II, the natural resource restoration/enhancement measures installed by GE, and future monitoring and maintenance activities for those measures.

#### **A. Performance Standards for Installation of Natural Resource Restoration/Enhancement Measures**

Attachment I to the SOW specifies the Performance Standards and other requirements for the natural resource restoration/enhancement activities required within portions of several RAAs, including Newell Street Area II. The Performance Standards specified in the SOW for natural resource restoration/enhancement activities at Newell Street Area II are as follows:

- GE must plant an herbaceous native grassland community on the surface of the vegetative engineered barrier to be installed at the former Newell Street parking lot area located within Parcel J9-23-12 (Figure 1), using a mixture of native grass and wildflower species.
- In addition to the vegetative enhancements, GE must place uncontaminated stumps and rock piles randomly throughout this vegetated area to provide habitat for fossorial and ground-dwelling wildlife.
- Further, GE must place bluebird boxes along the edge of the former parking lot area adjacent to the Housatonic River with a minimum of 300 yards between boxes.

Subsequent to entry of the CD, GE and EPA reached an agreement on July 16, 2001, consistent with the Performance Standards contained in the CD and SOW for the Newell Street parking lot area, that GE would install a one-foot vegetative engineered barrier over the existing pavement/soil in that area, except that such a barrier is not needed in discrete portions of this area where the average PCB concentrations are below the remediation Performance Standards for recreational areas, so long as the effectiveness of the barrier is not impaired by discontinuities in the barrier and any pavement in those areas is replaced with a native grassland community. GE later determined that installation of a paved access road was needed in a portion of the Newell Street parking lot area to support ongoing non-aqueous-phase liquid (NAPL) recovery activities within this RAA under the Groundwater Management Area 1 (GMA 1) program. As a result, in response to the Trustees' letter of April 25, 2005, GE agreed in the Addendum to install natural resource restoration/enhancement plantings (i.e., an herbaceous native grassland community) within a portion of the "wooded area" at Parcel J9-23-12 to offset the portion of the Newell Street parking lot area that would not be restored with a grassland habitat, but would be covered by the paved access road. The areas subject to natural resource restoration/enhancement activities are shown on Figure 1.

In addition, the Trustees subsequently requested, by letter to GE dated June 10, 2005, that GE not place uncontaminated stumps and rock piles within the natural resource restoration/enhancement areas within Newell Street Area II.

#### **B. Natural Resource Restoration/Enhancement Measures Installed by GE**

To satisfy the above-referenced Performance Standards, GE conducted the following activities at Newell Street Area II:

- As part of the restoration activities following remediation, GE planted an herbaceous native grassland community on the surface of the vegetative engineered barrier at the Newell Street parking lot area (excluding the paved access road), as well as in a portion of the wooded area on Parcel J9-23-12 (as shown on Figure 1), using a mixture of native grass and wildflower species proposed in the Addendum and approved by EPA.
- In addition, GE installed a bluebird box along the edge of the former parking lot area adjacent to the Housatonic River, since there was not room for more than one such box to satisfy the minimum 300-yard spacing requirement.

In accordance with the Trustees' June 10, 2005 letter, GE did not place stumps and rock piles randomly throughout the natural resource restoration/enhancement area.

### **C. Monitoring and Maintenance**

Future activities associated with the natural resource restoration/enhancement measures installed at Newell Street Area II consist of monitoring and maintenance. The Performance Standards and other requirements for such monitoring and maintenance are set forth in Section 8 of Attachment I to the SOW. Consistent with those Performance Standards and requirements, the *Restoration Project Monitoring and Maintenance Plan* provided in Attachment A to the Addendum summarizes the monitoring and maintenance activities to be conducted by GE within the natural resource restoration/enhancement areas at Newell Street Area II. An additional copy of that plan is attached hereto as Attachment A.

As indicated in that plan, monitoring activities will consist of two site visits during each of the first three years after planting, one visit during the fifth year after planting, and one visit during the seventh year after planting. In each of the first three years after planting, visits will be conducted in the late spring after the first leaf flush (May/June) and in the summer (July/August) to assess plant survival. The single visit in the fifth and seventh year after planting will be conducted in the summer (July/August). Each of these visits will include a field inspection and survey of the planting area to: (a) verify areal coverage by herbaceous species; (b) determine any instances of trespassing or herbivory; (c) assess the apparent vigor of the vegetation; and (d) inspect for the presence of invasive species (as listed in Attachment A). Replanting or reseeding will be conducted where necessary in accordance with the attached plan. In addition, recommendations will be made, as appropriate, for additional fertilizing, watering, or measures to reduce herbivory; and GE will ensure that no greater than 5% of any area within the planting area is covered with invasive species.

Further, GE will prevent shrub and tree growth within the planted area through various means as described in Attachment A, including mowing once every one to three years after August 1.

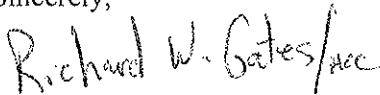
Finally, the bluebird box will be inspected on an annual basis for three years to determine if it has been damaged. If the box has been damaged sufficiently to make it uninhabitable by bluebirds, it will be replaced. (Note that since stumps and rock piles were not placed in this area, the statements in Attachment A regarding inspections of such structures are not applicable.)

GE will perform these inspection activities in accordance with the procedures specified above, with the 2007 inspections scheduled for June and July or August 2007. During the inspections, GE will utilize the Natural Resource Restoration/Enhancement Inspection Checklist provided in Attachment B. Results of these inspections will be summarized in reports prepared using field notes and other information collected during each of the monitoring visits. These reports will summarize the results of the inspections and any maintenance activities performed, and will include photographic documentation of the conditions of the restoration areas as well as copies of the completed Natural Resource Restoration/Enhancement Inspection Checklist. Each report will be submitted to the Trustees (through the Lead Administrative Trustee), with copies to EPA and the Massachusetts Department of Environmental Protection (MDEP), within 90 days of each inspection.

**D. Final Restoration Installation Inspection**

Paragraph 120 of the CD provides that, after GE submits the Completion of Installation of Restoration Work Report, GE will schedule an installation inspection and meeting, to be attended by GE, EPA, and the Trustees and to be followed by the Trustees' determination of whether the installation of the restoration work has been completed in accordance with the applicable requirements and Performance Standards in the CD. Please call me at (413) 448-5909 to arrange a time for that inspection and meeting, or if you have questions or comments concerning this report.

Sincerely,

Handwritten signature of Richard W. Gates in cursive script.

Richard W. Gates  
Remediation Project Manager

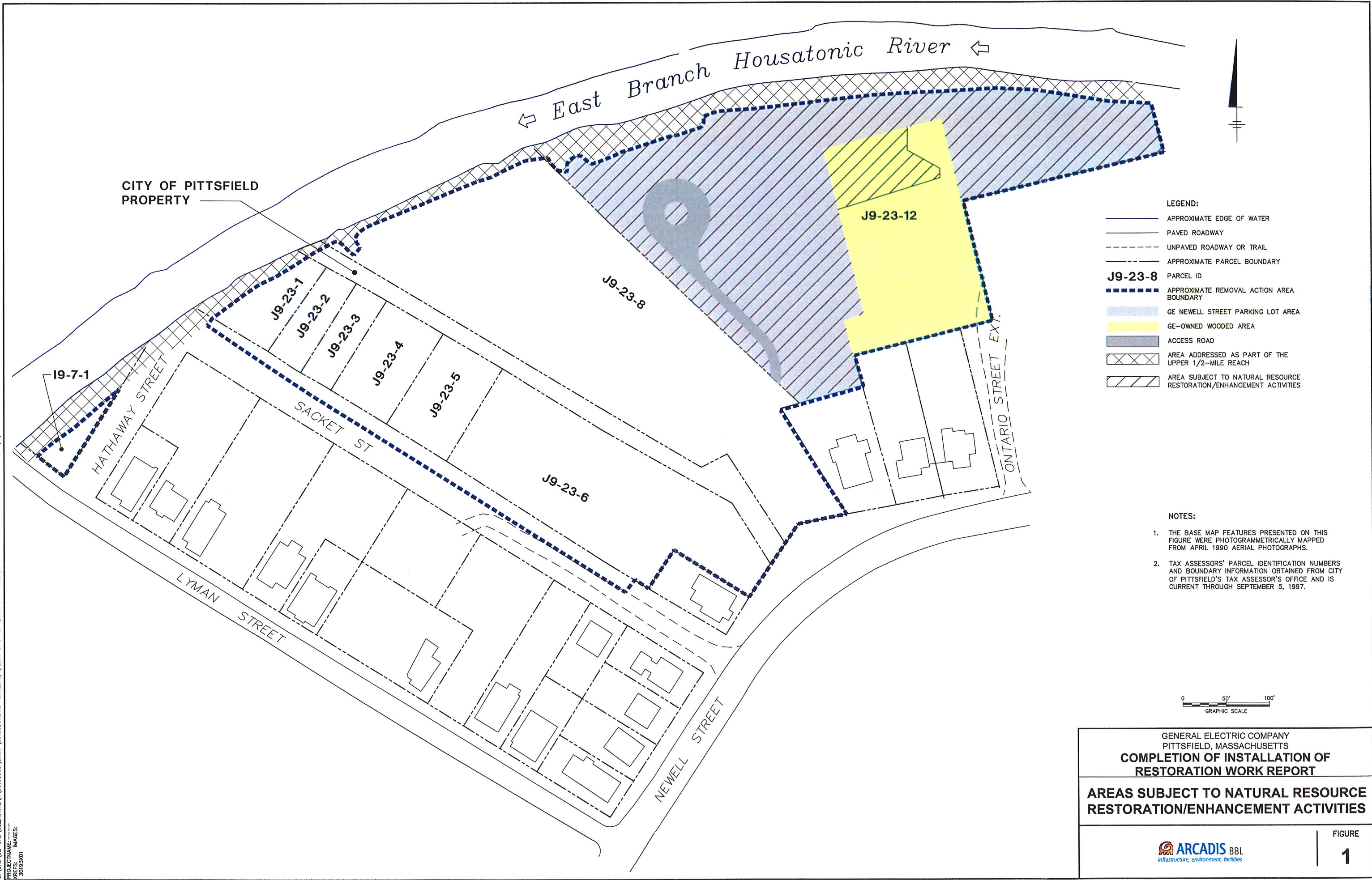
Attachments

cc: Dean Tagliaferro, EPA  
Tim Conway, EPA  
Holly Inglis, EPA  
Rose Howell, EPA\*  
Linda Palmieri, Weston (2 copies)  
Anna Symington, MDEP\*  
Jane Rothchild, MDEP\*  
Susan Steenstrup, MDEP (2 copies)  
Mayor James Ruberto, City of Pittsfield  
Nancy E. Harper, MA AG\*  
Michael Carroll, GE\*  
Andrew Silber, GE  
Rod McLaren, GE  
James Nuss, ARCADIS BBL  
James Bieke, Goodwin Procter  
Public Information Repositories  
GE Internal Repositories

(\* without attachments)

**Figure**

[SYR-85-SYR] SYR-85-KLS LAYER: ON\* OFF\*\*REF\*  
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SAVED: 6/4/2007 3:19 PM LAYOUT: 1 PAGES: 1 OF 1  
PENTABLE: PLT\FULL.CTB PRINTED: 6/4/2007 3:19 PM BY: KSARTORI



GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS

**COMPLETION OF INSTALLATION OF  
RESTORATION WORK REPORT**

**AREAS SUBJECT TO NATURAL RESOURCE  
RESTORATION/ENHANCEMENT ACTIVITIES**

**ARCADIS BBL**  
infrastructure, environment, facilities

FIGURE  
**1**

**Attachments**

**Attachment A**

Restoration Project Monitoring and  
Maintenance Plan



# ***Attachment A - Restoration Project Monitoring and Maintenance Plan***

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## **Introduction**

Following the implementation of natural resource restoration/enhancement activities within the Newell Street parking lot area, GE will monitor, inspect, and maintain the plantings and structures in this area in accordance with the Performance Standards and other requirements set forth in Section 8 of Technical Attachment I in the *Statement of Work for Removal Actions Outside the River (SOW)*. This *Restoration Project Monitoring and Maintenance Plan (RPMMP)* summarizes the monitoring and maintenance activities to be conducted by GE within the Newell Street parking lot area to satisfy the above-referenced Performance Standards. The scope of these monitoring and maintenance activities and associated reporting activities is summarized below.

## **Scope of Monitoring and Maintenance Activities**

To achieve the applicable Performance Standards specified in Technical Attachment I, GE will implement this monitoring program following completion of response actions within the Newell Street parking lot area. The monitoring program will consist of two visits during each of the first three years after planting, one visit during the fifth year after planting, and one visit during the seventh year after planting. In each of the first three years after planting, visits will be conducted in the late spring after the first leaf flush (May/June) and in the summer (July/August) to assess plant survival. The single visit in the fifth year and seventh year after planting will be conducted in the summer (July/August).

Each monitoring visit will consist of a field inspection and survey of the Newell Street parking lot area. Estimates of groundcover by herbaceous species will be made to verify aerial coverage. Any indications of damage from trespassing or herbivory will be noted. In addition, GE will arrange for a qualified individual to assess the apparent vigor of the planted specimens using best professional judgment based on accepted restoration standards and familiarity with local conditions. Any herbaceous planting area within the Newell Street parking lot area with less than 100% cover will be supplemented with additional planting and seeding. Recommendations will also be made for supplemental activities such as additional fertilizing or watering, and implementation of measures to reduce herbivory. In the event a significant loss of plantings (greater than 1/4 acre) is observed during one of the visits and GE is required to conduct replanting activities, the timing for

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monitoring of that area will be restarted following replanting activities. GE will not be required to replant an area if the loss of vegetation or growth failure is caused solely by actions of a third party (excluding a GE contractor).

During each of the monitoring visits, GE will also inspect for the presence of invasive species within the Newell Street parking lot area. Invasive species of concern are Amur honeysuckle, Autumn olive, Black locust, Black swallow-wort, Common barberry, Common buckthorn, Garlic mustard, Glossy buckthorn, Goutweed or Bishop's weed, Japanese barberry, Japanese honeysuckle, Japanese knotweed, Morrow's honeysuckle, Morrow's X Tatarian honeysuckle (hybrid), Multiflora rose, Norway maple, Oriental bittersweet, Phragmites - Reed grass, Porcelain berry, Purple loosestrife, Russian olive, Tatarian honeysuckle, and Yellow iris. GE will ensure that no greater than 5% of any area within Newell Street parking lot area is covered with invasive species. Invasive species will be removed in an appropriate manner.

GE will prevent shrub and tree growth within the Newell Street parking lot area through various means (i.e., periodic mowing, shrub/tree removal, etc.). Mowing will be conducted once every one to three years, and will occur no earlier in the year than August 1.

GE will inspect the other engineering structures utilized within the Newell Street parking lot area as part of the restoration activities on a yearly basis for three years to ensure their integrity and ability to function. GE will inspect the bluebird box to ensure that it has not become damaged. If the damage is sufficient to render the box uninhabitable by bluebirds, then it will be replaced. Rock piles and stumps will be inspected to ensure that major damage from acts such as vandalism have not leveled or relocated the structures. Due to the use of these structures by small mammals for the creation of dens, GE will only conduct maintenance upon the rock piles and stumps (e.g., restacking the rock piles and/or reorienting the stumps) in the case of catastrophic damage to the structures.

## **Reporting**

GE will prepare and submit to the Trustees an event-specific report on these inspection, monitoring, and maintenance activities, including the results of the inspections and any maintenance activities performed. The report will be prepared using field notes and other information collected during each of the monitoring visits. The report will include photographic documentation of the conditions of the Newell Street parking lot area. Such a report will be submitted to the Trustees, with copies to U.S. Environmental Protection Agency (EPA) and Massachusetts Department of Environmental Protection (MDEP), within 90 days of the inspection.

**Attachment B**

Natural Resource Restoration/  
Enhancement Inspection Checklist

**NATURAL RESOURCE RESTORATION / ENHANCEMENT  
INSPECTION CHECKLIST**

**NEWELL STREET AREA II REMOVAL ACTION**

**PARCEL J9-23-12 (PARKING LOT AREA AND PORTION OF WOODED AREA)**

**I. GENERAL INFORMATION**

Inspection Date: \_\_\_\_\_  
Conducted By: \_\_\_\_\_  
Weather Conditions: \_\_\_\_\_  
Date of Last Inspection: \_\_\_\_\_

**II. INSPECTION SUMMARY**

**1. Groundcover**

**A. Estimated Groundcover** *(Note a percentage of groundcover by herbaceous species; note evidence of areas of bare/sparse vegetation; note any damage from trespassing or herbivory; note any physical changes since last inspection, etc.)*


**B. Presence of Invasive Species** *(Note a percentage of area occupied by invasive species; note the species present including but not limited to the following: Amur honeysuckle, Autumn olive, Black locust, Black swallow-wort, Common barberry, Common buckthorn, Garlic mustard, Glossy buckthorn, Goutweed or Bishop's weed, Japanese barberry, Japanese honeysuckle, Japanese knotweed, Morrow's honeysuckle, Morrow's X Tartarian honeysuckle [hybrid], Multiflora rose, Norway maple, Oriental bittersweet, Phragmites - Reed grass, Porcelain berry, Purple loosestrife, Russian olive, Tartarian honeysuckle, or Yellow iris, etc.)*


**2. Bluebird box to be inspected on a yearly basis for 3 years.** *(Note any evidence of damage and the extent of damage such as the need to be replaced.)*


**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.*


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


**ATTACH ADDITIONAL INFORMATION AS APPROPRIATE**