



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted via Overnight Courier*

October 2, 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)  
Summary of September 2007 Inspection of the Natural Resource Restoration/  
Enhancement Area**

Dear Ms. Young:

On September 5, 2007, the General Electric Company (GE) performed the second inspection of areas subject to natural resource restoration/enhancement (NRRE) measures at Newell Street Area II. As shown on Figure 1, areas subject to NRRE measures include the majority of the GE-owned Newell Street parking lot area and a portion of the "wooded area" at Parcel J9-23-12. These measures consisted of the following:

- The planting of 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 shown on Figure 1, using a mixture of native grass and wildflower species proposed in the Addendum and approved by EPA.
- The installation of a bluebird box along the edge of the former parking lot area adjacent to the Housatonic River.

In accordance with the Natural Resource Trustees' (Trustees') June 10, 2005 letter, GE did not place stumps and rock piles within the NRRE areas.

GE conducted the initial inspection of areas subject to NRRE measures at Newell Street Area II on June 20, 2007. A summary of the June 2007 inspection activities was submitted to the Trustees (with copies to EPA and the Massachusetts Department of Environmental Protection [MDEP]) in a letter dated August 3, 2007.

### **Summary of Inspection Activities**

Consistent with the initial inspection, the September 2007 inspection was conducted in accordance with the requirements for such inspections set out in the *Restoration Project Monitoring and Maintenance Plan* (Restoration M&M Plan) provided as Attachment A to the *Final RD/RA Work Plan Addendum for Newell Street Area II*. Inspection activities consisted of a field inspection and survey of the planting areas to: (a) verify aerial coverage by herbaceous species; (b) determine any evidence of trespassing or herbivory; (c) assess the apparent vigor of the vegetation; and (d) inspect for the presence of invasive species (as listed in the Restoration M&M Plan).

The results of the September 2007 inspection are documented in a Natural Resource Restoration/Enhancement Inspection Checklist and accompanying photographs. Copies of the completed checklist and the photographs are provided in Attachments A and B, respectively.

In addition, the September 2007 inspection included observations of areas where any follow-up activities were identified during the June 2007 inspection. No follow-up activities were identified during the June 2007 inspection. A summary of the follow-up activities identified during the September 2007 inspection is provided below.

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

As indicated in the Restoration M&M Plan, any herbaceous planting area within the NRRE areas with less than 100% cover will be supplemented with additional planting and seeding. In summary, the recent inspection results concluded that the majority of the subject area contains less than 100% herbaceous cover. The inspection indicated the presence of different stages of vegetation establishment within three portions of the NRRE areas. The northeastern portion of the Newell Street parking lot area and a portion of the "wooded area" exhibited approximately 80% ground cover, with 50% of the species observed from the seed mix. The northern portion of the Newell Street parking lot area exhibited approximately 60% ground cover, with 75% of the species observed from the seed mix. The western portion of the Newell Street parking lot area exhibited approximately 50% ground cover, with 75% of the species observed from the seed mix.

In response to the above observations, GE proposed, in separate communications with the Trustees and EPA, a plan to conduct sampling of the upper three inches of topsoil within the NRRE areas for pH and pK analyses. These analyses will aid in the determination of what factors may be restricting the growth and promulgation of desired herbaceous species. Subsequent to the review of the above referenced analyses, GE proposed to augment, if necessary, the nutrient levels and/or balance pH levels of soils within the NRRE areas and determine whether the addition of mulch is necessary. Following completion of the above activities, GE proposed to reseed portions of the NRRE areas showing deficient herbaceous cover. Reseeding activities are anticipated to include scarifying the surficial soil and applying the approved seed mix at approximately 25 pounds per acre, consisting of 15 pounds per acre of the approved seed mix and 10 pounds per acre of rye seed. The above activities are anticipated to be initiated during fall 2007.

No significant signs of herbivory or stress were observed in the developing plant communities. None of the invasive species listed in the Restoration M&M Plan were observed within the NRRE areas, although some invasive species were present in undisturbed vegetated areas adjacent to the NRRE areas. Since the NRRE areas are surrounded by a locked chain-link fence (except along the river) restricting trespasser access, no signs of damage from trespassers was observed.

**Schedule of Future Inspections**

The Restoration M&M Plan provides that monitoring activities are to 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 are to 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 is to be conducted in the summer (July/August). Following each inspection, an inspection report is to be prepared and submitted to the Trustees (through the Lead Administrative Trustee), with copies to EPA and the MDEP.

Please call me if you have any comments or questions.

Sincerely,

Richard W. Gates/EGIB

Richard W. Gates  
Remediation Project Manager

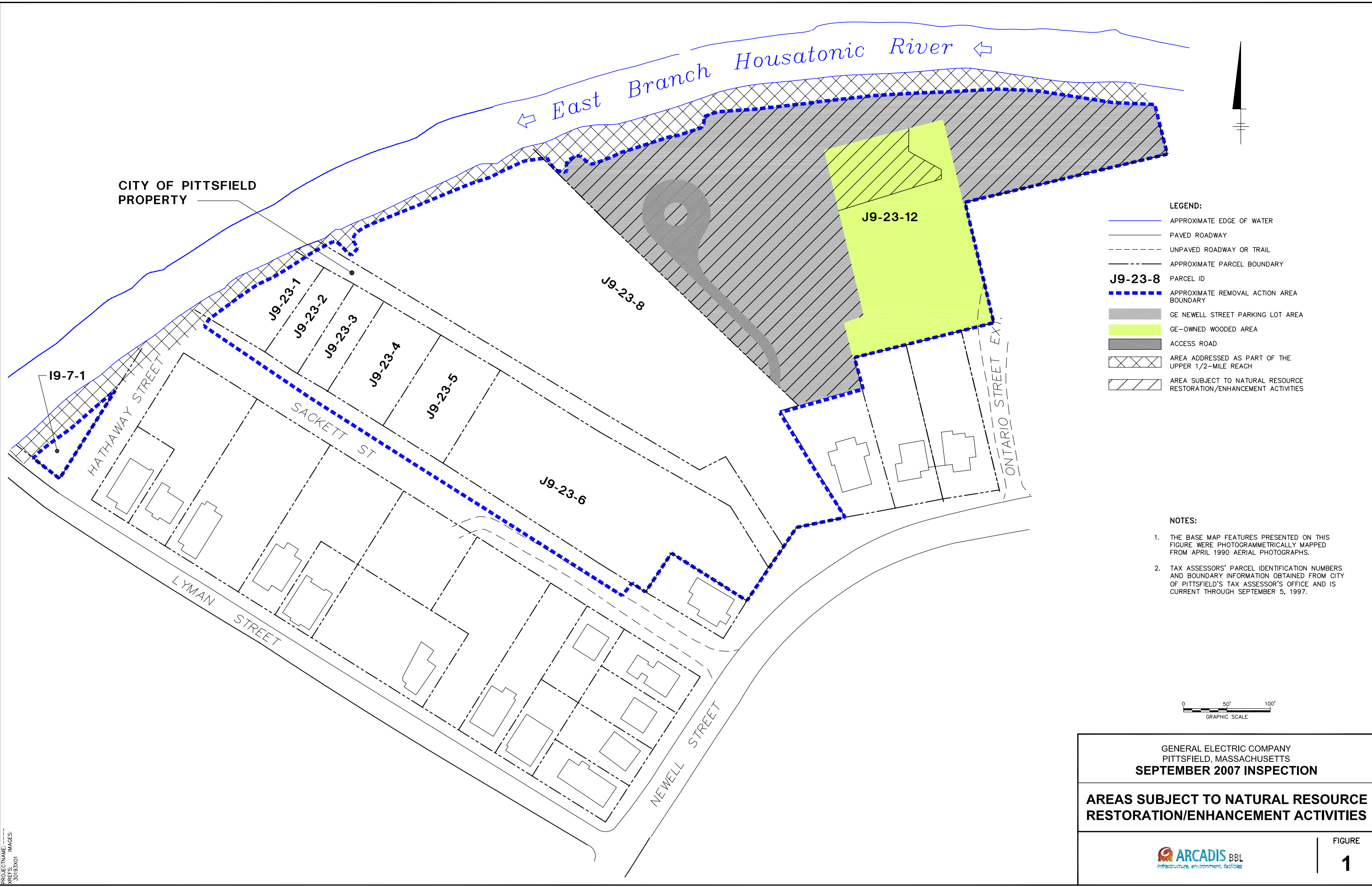
Attachments

cc: Dean Tagliaferro, EPA  
Richard Fisher, 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)  
Mike Chelminski, Woodlot Alternatives, Inc.  
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 attachment*

Figure

[SYR-85-SYR] SYR-85-KLS.DWG LAYER: ON=\*. OFF=REF\*  
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 PENTABLE:PLT\FULL.CTB PRINTED:9/28/2007 10:47 AM BY:LFORAKER  
 PROJECT NAME: 30193X01



CITY OF PITTSFIELD PROPERTY

East Branch Housatonic River

- LEGEND:**
- APPROXIMATE EDGE OF WATER
  - PAVED ROADWAY
  - UNPAVED ROADWAY OR TRAIL
  - APPROXIMATE PARCEL BOUNDARY
  - J9-23-8** PARCEL ID
  - APPROXIMATE REMOVAL ACTION AREA BOUNDARY
  - GE NEWELL STREET PARKING LOT AREA
  - GE-OWNED WOODED AREA
  - ACCESS ROAD
  - AREA ADDRESSED AS PART OF THE UPPER 1/2-MILE REACH
  - AREA SUBJECT TO NATURAL RESOURCE RESTORATION/ENHANCEMENT ACTIVITIES

- NOTES:**
1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
  2. TAX ASSESSORS' PARCEL IDENTIFICATION NUMBERS AND BOUNDARY INFORMATION OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE AND IS CURRENT THROUGH SEPTEMBER 5, 1997.

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

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

**Attachment A**

Completed Inspection Form

**NATURAL RESOURCE RESTORATION / ENHANCEMENT  
INSPECTION SUMMARY AND CHECKLIST**

**NEWELL STREET AREA II REMOVAL ACTION**

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

**I. GENERAL INFORMATION**

Inspection Date: September 5, 2007  
Conducted By: Anthony Esposito Phone Number: (315) 671-9268  
Weather Conditions: Sunny, 70 degrees F  
Date of Last Inspection: June 20, 2007

**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.)

Northeastern portion of Newell Street parking lot area and portion of the "wooded area" - 80% total groundcover; 50% from seed mix.  
Northern portion of Newell Street parking lot area - 60% total groundcover; 75% from seed mix.  
Western portion of Newell Street parking lot area - 50% total groundcover; 75% from seed mix.  
Temporary access road installed since last inspection (see 3 below).

**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, Morrows' 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.)

None of the listed species were observed in the NRRE areas.

**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.)

NA (bluebird box inspected annually during the spring inspection).

**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.)

Temporary access road was installed from the north end of the asphalt access road to just south of the riverbank and extended east and west.

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

- GE proposes to conduct sampling of the upper three inches of topsoil within the NRRE areas for pH and pK analyses. Subsequent to the review of the above referenced analyses, GE proposes to augment, if necessary, the nutrient levels and/or balance pH levels of soils within the NRRE areas and evaluate the need for addition of mulch.
- Following completion of the above activities, GE proposes to scratch and reseed portions of the NRRE areas showing deficient herbaceous cover.
- The above activities are anticipated to be initiated during fall 2007.

**ATTACH ADDITIONAL INFORMATION AS APPROPRIATE**

**Attachment B**

Photo Log





Photo #1: Northeast portion, looking east.



Photo #2: Northern portion, looking west.

Client: General Electric Company  
Project Name: Newell Street Area II  
Project Location: Pittsfield, Massachusetts

**ARCADIS** BBL





Photo #3: Vegetation of the fenced enclosure, looking south.



Photo #4: Vegetation of the fenced enclosure, looking southwest.

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Client: General Electric Company  
Project Name: Newell Street Area II  
Project Location: Pittsfield, Massachusetts

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**ARCADIS** BBL





Photo #5: Southern portion, looking south.



Photo #6: Western portion, looking west.

Client: General Electric Company  
Project Name: Newell Street Area II  
Project Location: Pittsfield, Massachusetts

**ARCADIS** BBL





Photo #7: Area immediately northwest of the northwest corner of the fenced enclosure, looking north.



Photo #8: Drainage ditch east of the access road, looking north.

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Project Name: Newell Street Area II  
Project Location: Pittsfield, Massachusetts

**ARCADIS** BBL