

GE 159 Plastics Avenue Pittsfield, MA 01201 USA

Transmitted via Overnight Courier

September 11, 2008

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

Re: Flood

Floodplain GE-Pittsfield/Housatonic River Site

Floodplain Residential and Non-Residential Properties Adjacent to 1½ Mile Reach of Housatonic River (GECD710 and GECD720)

Summary of August 2008 Inspection Activities for the Remediated Phase 2 Floodplain Properties

Dear Mr. Tagliaferro:

On August 14, 2008, the General Electric Company (GE) performed its third post-remediation inspection of the remediated Phase 2 properties located within the floodplain adjacent to the 1½ Mile Reach of the Housatonic River. The Phase 2 floodplain properties at which GE conducted soil remediation actions consist of two residential properties (Parcels I8-4-201/202 and Parcels I8-4-2,-3,-4) and one non-residential property (Parcel I8-4-7), as shown on Figure 1. GE completed the remediation of these properties in October 2007. As part of this remediation, GE restored the affected portions of these properties with an herbaceous vegetative cover and planted trees on the two residential properties.

Previous post-remediation inspections were performed at these properties in October 2007 and May 2008. Those inspections were conducted in accordance with Section 6.3 of GE's approved Revised Supplemental Soil Evaluation Report and Removal Design/Removal Action Work Plan Addendum for Selected Phase 2 Floodplain Properties Adjacent to the 1½ Mile Reach of Housatonic River (Revised RD/RA Addendum, March 2007), as modified and supplemented with a number of activities based on discussions between GE and EPA relating to draft Final Completion Reports (FCRs) for the residential and non-residential floodplain properties adjacent to the 1½ Mile Reach. Summaries of these inspections were submitted to EPA in letters dated November 21, 2007 and June 20, 2008.

Consistent with previous inspections, the August 2008 inspection was performed for areas that were backfilled and restored during the implementation of the remediation actions and included an assessment of the planted vegetation. The inspection of such areas at the two residential properties (Parcels I8-4-2,-3,-4 and I8-4-201/202) was performed in accordance with the Post-Removal Site Control requirements specified in the final version of the *Final Completion Report for Removal Action for Housatonic River Floodplain – Current Residential Properties Adjacent to 1½ Mile Reach* (1½ Mile Residential Floodplain FCR), which was submitted to EPA on July 30, 2008 and approved by EPA on August 27, 2008. The inspection of non-residential Parcel I8-4-7 was performed in accordance with the Revised RD/RA Addendum, as modified by discussions between GE and EPA relating to the draft FCR for the 1½ Mile non-residential floodplain properties.

### **Summary of Inspection Activities**

The August 2008 inspection included observations of the backfilled/restored areas, focusing on the following: (a) the effectiveness of erosion controls in areas where vegetation is not yet established; (b) any areas where excessive settlement has occurred relative to the surrounding areas; (c) any drainage or growth problems; (d) any areas of erosion; and (e) other conditions that could jeopardize the performance of the completed remediation actions (for example, burrows, vehicle ruts, unauthorized uses of areas, etc.). The inspection also evaluated whether the vegetative cover that had been planted or seeded in disturbed areas was growing as anticipated and providing the desired degree of erosion control.

In addition, the August 2008 inspection included observations of the trees planted as part of restoration activities at Parcels I8-4-201/202 and Parcels I8-4-2,-3,-4 to ensure that they are in good general health. Figure 2 contains the restoration planting plan for Parcels I8-4-201/202 and Parcels I8-4-2,-3,-4, as presented on Figure H-1 from the 1½ Mile Residential Floodplain FCR. Figure 2 also provides information regarding replanted trees, including the species, installation date, and size at the time of replanting. As shown on that figure, one sugar maple tree was replanted on Parcels I8-4-2,-3,-4 in July 2008.

Observations at these properties included a stem count of the planted trees (quantity per species per parcel) in good health and a stem count of trees, if any, that were dead or dying or showing evidence of stress within each property. (Since no trees were planted on Parcel I8-4-7, stem counts were not performed at that property.) The results of the observations were used to evaluate if all (100%) of the planted trees (as specified on Figure 2, including the replanted tree) are surviving. Additionally, each tree observed was measured to determine the average height and range of heights of each species of tree within each property. In conjunction with the tree observations, GE inspected the tree cages, guards, and stakes (where present) to ensure that these items were functioning to protect the trees from damage.

The August 2008 inspection also included observations of areas where the need for follow-up activities had been identified during the May 2008 inspection. These activities included monitoring a stressed flowering dogwood on Parcels I8-4-201/202, replacing one dead sugar maple on Parcels I8-4-2,-3,-4 (as noted above), and installing tree guards on all of the planted trees on Parcels I8-4-201/202 and Parcels I8-4-2,-3,-4.

The results of the August 2008 inspection are provided in an Inspection Summary and Checklist for each property subject to inspection. The form used in this inspection for the residential properties was the form included in the 1½ Mile Residential Floodplain FCR, and the form used for Parcel I8-4-7 was that developed for inclusion in the draft FCR for the 1½ Mile non-residential floodplain properties. The completed inspection forms for the August 2008 inspection are provided in Attachment A. Documentation of tree observations at Parcels I8-4-201/202 and Parcels I8-4-2,-3,-4 is provided in tables in Attachment B. These tables list, for each species at each of these properties, the number of trees observed, the height of each individual tree counted, the condition of each tree observed, and the condition of the associated tree cage, guard, or stake (where present).

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

As indicated on the forms in Attachment A, the August 2008 inspection indicated that the backfilled/restored areas at the inspected properties were in good overall condition, that the herbaceous vegetation adjacent to the planted trees was growing as anticipated, and that the vegetation identified for follow-up monitoring in the May 2008 inspection was also in good condition. Tables B-1 through B-5 in Attachment B provide further information on the trees observed, including a listing of the total number of plantings and their height and condition. The results of the tree observations and measuring activities are summarized in the following table:

Tree Count Results								
Parcel	Species	Planted (or Replanted) <sup>1</sup>	Observed in Good Health	Observed Dead/ Stressed	Avg Height (ft.)	Range of Heights (ft.)	Percent in Good Health (%)	Percent Survival (%) <sup>2</sup>
18-4-201/ 202	Black Cherry	1	1	0	5		100	100
	Flowering Dogwood	2	2	0	9.5	9-10	100	100
	Sugar Maple	10	10	0	14.6	13-16	100	100
I8-4-2,-3, -4	Crimson King Maple	1	1	0	14		100	100
	Sugar Maple	3 (1)	3	0	14.7	14-15	100	100

#### Notes:

- 1. The quantity of each species as listed in this column corresponds to the planted quantity identified on Figure H-1 from the 1½ Mile Residential Floodplain FCR and presented as Figure 2 to this letter, including any replanted trees (number shown in parentheses).
- 2. This column shows the percentage of trees that were alive relative to the planted quantity.

Based on the August 2008 observations at the Phase 2 properties, no further maintenance, repair, or replanting activities were identified, although the replanted maple tree on Parcels I8-4-2,-3,-4 was missing a tag identifying the species, installation date, and size at time of replanting. This tag will be replaced prior to the next inspection.

#### Schedule for Future Inspections

The next inspection of the remediated Phase 2 floodplain properties is scheduled for May 2009. Future inspections of these properties will be conducted in accordance with the applicable Post-Removal Site Control requirements specified in the relevant FCR (assuming that the FCR for the non-residential floodplain properties has been approved by the time of the next inspection). The backfilled/restored areas will be inspected annually (subject to EPA approval of a different frequency), as well as after severe storms. The revegetated areas will be inspected in May and August or September 2009 to assess the condition of the planted vegetation. However, the new tree installed on Parcels I8-4-2,-3,-4 in July 2008 will be inspected twice per year (in May and August or September) through August/September 2010. All future inspections will utilize the Inspection Summary and Checklist forms included in the relevant FCR. 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.

Richard W. Gates/EGB

Sincerely

Richard W. Gates

Remediation Project Manager

#### Attachments

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

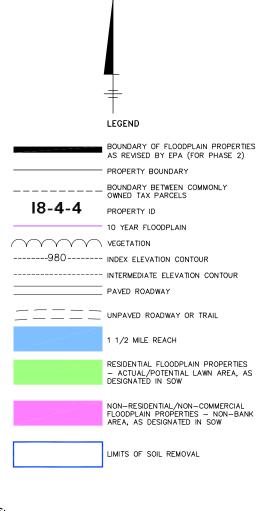
Jeffrey Bernstein, BCK Law, P.C.
Michael Carroll, GE\*
Rod McLaren, GE\*
Peter Wojcik, GE\*
James Nuss, ARCADIS
James Bieke, Goodwin Procter
Property Owner - Parcels 18-4-201/202
Property Owner - Parcels 18-4-2,-3,-4
Public Information Repositories
GE Internal Repository

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

### **ARCADIS**

Figures

3091 3091 3091 3091 3091



#### NOTES:

- THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
- PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION.
- THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.

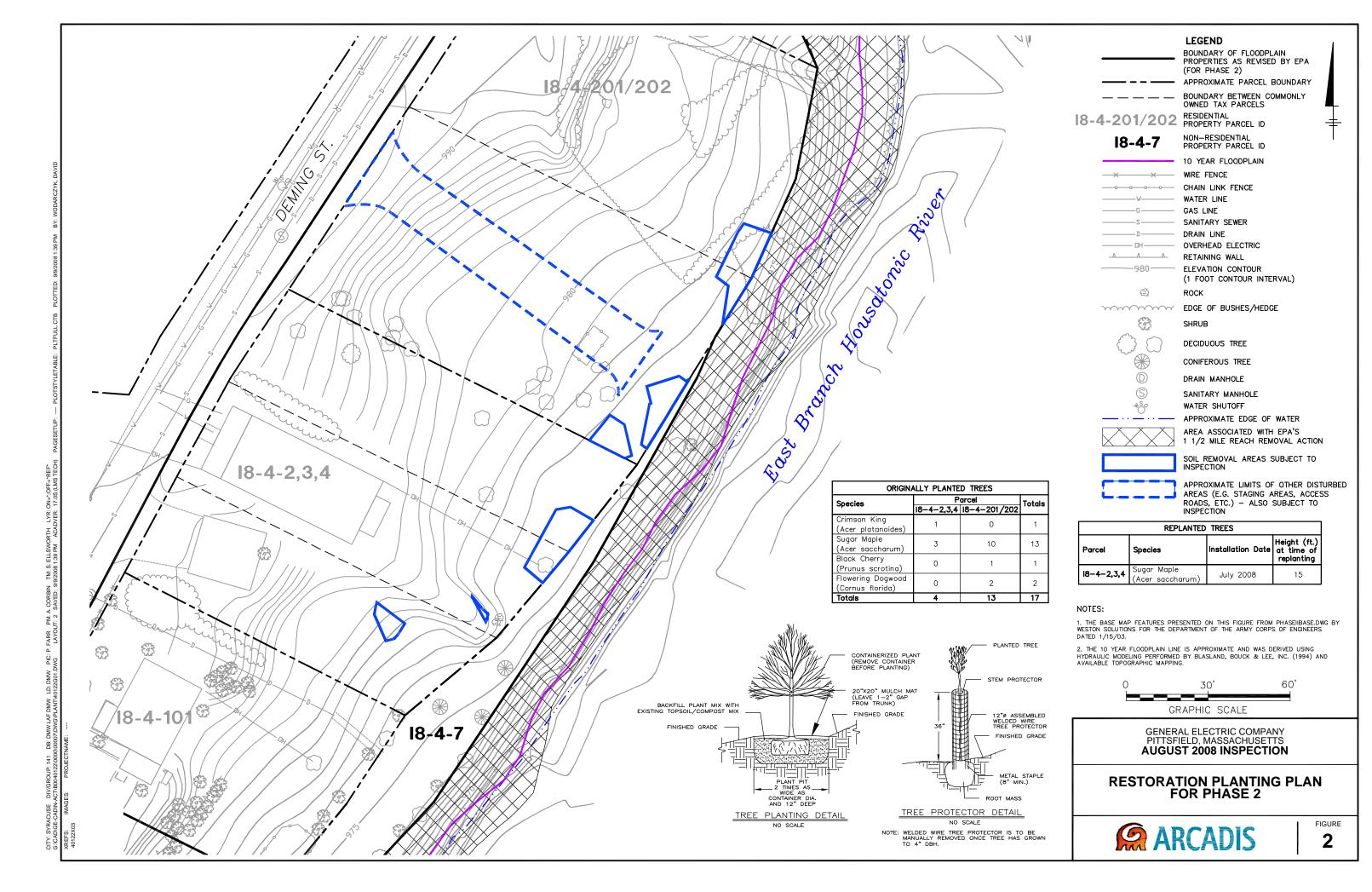


GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS AUGUST 2008 INSPECTION

SITE PLAN



FIGURE



### **ARCADIS**

### Attachment A

Completed Inspection Forms

### INSPECTION SUMMARY AND CHECKLIST

### HOUSATONIC RIVER (1.5-MILE REACH) RESIDENTIAL FLOODPLAIN PROPERTIES

### PARCEL 18-4-201/202

I. G	SENERAL INFORMATION	
Insr	pection Date:	8/14/2008
	nducted By/Phone Number:	Paolo Filippetti/(585) 385-0090 ext.35
	ather Conditions:	Partly Cloudy, 80°F
Dat	e of Last Inspection:	5/22/2008
	INSPECTION SUMMARY	
1.	Action for Housatonic River	9, 10, or 11 (as they apply to the property being inspected) of the <i>Final Completion Report for Removal</i> r <i>Floodplain - Current Residential Properties Adjacent to 1-1/2 Mile Reach</i> (Final Completion Report) and the drawings included in Appendix B of that document have been reviewed.
-	Confirmed	
2.		estored Areas (Note any physical changes since last inspection; note evidence of any of the following: erosion, drainage problems, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, etc.)
-	All areas in good condition.	
3.		y physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of
	tree stakes; for Parcels 17-2 the cover is adequately est the Final Completion Repo	ner landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and 2-20, I7-2-44, I7-3-6, and I7-3-7, monitor the grass/herbaceous cover for evidence of stress until such time as tablished and growing as anticipated; review the applicable restoration planting plan included in Appendix H of the ort [for Phase 3, the trees/shrubs subject to inspection are listed on Table H-1 of Appendix H] and determine planted trees and shrubs subject to inspection; and measure and record the size of all trees and shrubs
-	Vegetative cover in good co	ondition.
<u>-</u>	Tree observations are show	wn on Tables B-1, B-2, and B-3 in Attachment B; all trees observed are in good condition.
4.	•	firm that repair/maintenance measures identified during prior inspection have been performed; note any other ding parcel-specific restoration activities.)
-	13 tree guards referenced i	in the May 2008 inspection report have been installed.
-	Stressed flowering dogwoo	d referenced in the May 2008 inspection report is in good condition.
	FOLLOW UP MAINTENANC	CE AND DEDAID ACTIVITIES
III.		CE AND REPAIR ACTIVITIES
F	None	

### INSPECTION SUMMARY AND CHECKLIST

# HOUSATONIC RIVER (1.5-MILE REACH) RESIDENTIAL FLOODPLAIN PROPERTIES

#### PARCEL 18-4-2,3,4

I. GENERAL INFORMATION	
Inspection Date:	8/14/2008
Conducted By/Phone Number:	Paolo Filippetti/(585) 385-0090 ext.35
Weather Conditions:	Partly Cloudy, 80°F
Date of Last Inspection:	5/22/2008
II. INSPECTION SUMMARY	
	9, 10, or 11 (as they apply to the property being inspected) of the Final Completion Report for Removal
Action for Housatonic River	r Floodplain - Current Residential Properties Adjacent to 1-1/2 Mile Reach (Final Completion Report) and the irawings included in Appendix B of that document have been reviewed.
<ul> <li>Confirmed</li> </ul>	
	estored Areas (Note any physical changes since last inspection; note evidence of any of the following: erosion, drainage problems, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas,
<ul> <li>All areas in good condition.</li> </ul>	
3. Vegetation Area (Note any	physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of
tree stakes; for Parcels I7-2 as the cover is adequately H of the Final Completion F	ner landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and 2-20, I7-2-44, I7-3-6, and I7-3-7, monitor the grass/herbaceous cover for evidence of stress until such time established and growing as anticipated; review the applicable restoration planting plan included in Appendix Report [for Phase 3, the trees/shrubs subject to inspection are listed on Table H-1 of Appendix H] and ivorship of planted trees and shrubs subject to inspection; and measure and record the size of all trees and n.)
<ul> <li>Vegetative cover in good co</li> </ul>	ondition.
<ul> <li>Tree observations are shown</li> </ul>	vn on Tables B-4 and B-5 in Attachment B; all trees observed are in good condition.
	firm that repair/maintenance measures identified during prior inspection have been performed; note any other
	ding parcel-specific restoration activities.) d in the May 2008 inspection report has been replaced.
	the May 2008 inspection report have been installed.
+ tree guards referenced in	the May 2000 inspection report have been installed.
III. FOLLOW-UP MAINTENANG	CE AND REPAIR ACTIVITIES
	anted maple tree identifying the species, date of installation, and size at time of replanting.
	and the second of the second o

### INSPECTION SUMMARY AND CHECKLIST

# HOUSATONIC RIVER (1.5-MILE REACH) NON-RESIDENTIAL FLOODPLAIN PROPERTIES

#### **PARCEL 18-4-7**

I. G	SENERAL INFORMATION	
-	ection Date:	8/14/2008
	ducted By/Phone Number:	Paolo Filippetti/(585) 385-0090 ext.35
We	ather Conditions:	Partly Cloudy, 80°F
Date	e of Last Inspection:	5/22/2008
	NSPECTION SUMMARY	
1.	Housatonic River Floodpla	r 7 (as they apply to the property being inspected) of the draft <i>Final Completion Report for Removal Action for nin - Non-Residential Properties</i> (Final Completion Report) and the applicable as-built survey drawings that document have been reviewed.
-	Confirmed	
2.		any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil s, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, etc.)
-	All areas in good condition	
3.	stressed/sparse cover], oth tree stakes; review the app stem count consisting of pl	by physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of the landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and policable restoration planting plan included in Appendix H of the Final Completion Report and determine: 1) a lanted and newly established trees/shrubs [quantity per species] in good health; and 2) a count of those species] that are dead, dying, or showing evidence of stress [if any].)
-		condition. (No trees planted.)
	•	
4.		ofirm that repair/maintenance measures identified during prior inspection have been performed; note any other auding parcel-specific restoration activities.)
-	None	
III.	FOLLOW-UP MAINTENANG	CE AND REPAIR ACTIVITIES
-	None	

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

### **ARCADIS**

### Attachment B

Documentation of Tree/Shrub Observations

## TABLE B-1 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL I8-4-201/202 - BLACK CHERRY (Prunus scrotina)

Tree	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)
1166	rieight (it.)	Condition of free	and otakes (where present)
1	5	Good	Good

Average Height (ft.):	5
Height Range (ft.):	
Total Tree Count:	1

### TABLE B-2 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL I8-4-201/202 - FLOWERING DOGWOOD (Cornus florida)

Tree	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)
1	10	Good	Good
2	9	Good	Good

Average Height (ft.):	9.5
Height Range (ft.):	9-10
Total Tree Count:	2

## TABLE B-3 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL I8-4-201/202 - SUGAR MAPLE (Acer saccharum)

Tree	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)
1	16	Good	Good
2	14	Good	Good
3	16	Good	Good
4	16	Good	Good
5	14	Good	Good
6	13	Good	Good
7	13	Good	Good
8	14	Good	Good
9	14	Good	Good
10	16	Good	Good

Average Height (ft.):	14.6
Height Range (ft.):	13-16
Total Tree Count:	10

### TABLE B-4 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL I8-4-2,-3,-4 - CRIMSON KING MAPLE (Acer platanoides)

			Condition of Tree Cage, Guard,
Tree	Height (ft.)	Condition of Tree	and Stakes (where present)
1	14	Good	Good

Average Height (ft.):	14
Height Range (ft.):	
Total Tree Count:	1

### TABLE B-5 SUMMARY OF TREE/SHRUB OBSERVATIONS - PARCEL I8-4-2,-3,-4 - SUGAR MAPLE (Acer saccharum)

Tree	Height (ft.)	Condition of Tree	Condition of Tree Cage, Guard, and Stakes (where present)
1	15	Good	Good
2	14	Good	Good
3	15	Good	Good

Average Height (ft.):	14.7
Height Range (ft.):	14-15
Total Tree Count:	3