



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Electronic Mail and Overnight Courier

September 15, 2008

Ms. Susan Steenstrup
Section Chief, Special Projects
Bureau of Waste Site Cleanup
Massachusetts Department of Environmental Protection
436 Dwight Street
Springfield, MA 01103

Mr. Dean Tagliaferro
EPA Project Coordinator
c/o Weston Solutions, Inc.
10 Lyman Street
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
30s Complex (GECD120)
Summary of Annual ERE Inspection for 2008**

Dear Ms. Steenstrup and Mr. Tagliaferro:

On August 28, 2008, the General Electric Company (GE) performed a visual inspection of Tax Parcel I10-4-101, which generally corresponds with the former 30s Complex at GE's facility in Pittsfield, Massachusetts, in accordance with the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site and the Post-Removal Site Control Plan (PRSCP) included in GE's *Final Completion Report for the 30s Complex Removal Action* (March 2005). A Grant of Environmental Restriction and Easement (ERE) was recorded for Parcel I10-4-101 in February 2005 to restrict future uses of the property, and the property was transferred to the Pittsfield Economic Development Authority (PEDA) in March 2005. Until such time as PEDA conveys an interest in this property to another party, GE is required to perform an annual ERE inspection to determine whether site conditions at the time of the inspection or activities conducted since the last inspection are consistent with the provisions of the ERE. This letter presents the results of the fourth annual ERE inspection conducted by GE since the transfer of the 30s Complex to PEDA in March 2005. (These ERE inspections focus on Parcel I10-4-101, which is the property subject to the ERE. Since that property corresponds generally with the former 30 Complex, it is generally referred to as the 30s Complex. However, along the edge of Silver Lake Boulevard, the 30s Complex actually extends slightly beyond the boundary of Parcel I10-4-101 to include a narrow strip between that boundary and the paved roadway. That strip is not subject to the ERE inspections.)

In accordance with the CD and the PRSCP, the annual ERE inspection consists of two components. The first component consists of a review of several ERE-related documents including, as appropriate: (i) the ERE itself, (ii) the Plan of Restricted Area, (iii) any conditional exceptions approved under the ERE (if known), (iv) any recorded amendments to and/or releases from the ERE, (v) the most recent topographic mapping, and (vi) any Post-Work Notification Forms (Exhibit E to the ERE) available to GE. The second component consists of a visual inspection of the 30s Complex to determine whether there is visual evidence that any of the following have occurred since the last annual inspection:

- Activities at or uses that are potentially contrary to the restrictions stated in the ERE;
- Utility construction or maintenance work or any building construction, modification, addition, and/or demolition;
- Soil excavations that involved more than 10 cubic yards of soil;
- Significant soil erosion; and
- Significant pavement construction, disturbance, and/or excavations.

Following the inspection, GE is required to submit a summary report, which is to include a summary of the findings of the inspection, an identification (based on the visual inspection) of any instances of potential non-compliance with the ERE, and a copy of a completed Annual Inspection Check List (which was provided as an exhibit to the PRSCP).

On August 28, 2008, GE conducted the 2008 annual ERE inspection for the 30s Complex. Based on consultation with PEDDA, no known new ERE-related documentation has been generated since transfer of this area to PEDDA. Thus, GE reviewed the existing documentation (i.e., ERE, Plan of Restricted Area, and topographic map included in the Final Completion Report). In addition, GE reviewed PEDDA's submission titled *Soil Investigation Report and Material Handling Plan for Planned Water Main Installation* for the 30s Complex (dated April 1, 2008).

The visual inspection revealed several changes in the physical condition of the property since the time of the last inspection in October 2007, as documented in the attached Annual Inspection Check List. Since the time of the October 2007 inspection, PEDDA has implemented a variety of site development activities in the 30s Complex. Based on information provided to us by PEDDA, some excavation activities have occurred at various locations throughout the 30s Complex, most of which were conducted in the surface and all of which were conducted within the top 6 feet. This excavation primarily included demolition and removal of surface-covering features such as railroad tracks, asphalt, concrete, foundations, and floor slabs. In addition, a new water main was recently installed in the 30s Complex, with a portion of that water main installed at the property subject to the ERE (and the remainder in the strip between Parcel I10-4-101 and the pavement of Silver Lake Boulevard). Based on the visual inspection, these activities have resulted in the removal of a vast majority of the paved surfaces within the 30s Complex and their replacement with topsoil and grass. The areas affected by these activities are shown on a figure attached to the Annual Inspection Check List. However, based on information provided to us by PEDDA as well as the August 28, 2008 visual inspection, none of these site activities or changes in physical condition to the property appears to be contrary to the restrictions stated in the ERE.

Please feel free to contact me at (413) 448-5902 with any questions or comments.

Sincerely,



Michael T. Carroll
Manager, Pittsfield Remediation Programs

Attachment

cc: T. Conway, EPA*
J. Kilborn, EPA
H. Inglis, EPA
R. Howell, EPA*
M. Gorski, MDEP
J. Rothchild, MDEP
A. Symington, MDEP*
K.C. Mitkevicius, USACE
L. Palmieri, Weston (2 copies)
Mayor J. Ruberto, City of Pittsfield
T. Hickey, Director, PEDDA

J. Bernstein, BCK Law
T. Bowers, Gradient
J. Gagnon, O'Reilly, Talbot & Okun
R. McLaren, GE*
A. Silfer, GE*
R. Gates, GE*
J. Bieke, Goodwin Procter
S. Gutter, Sidley Austin
J. Nuss, ARCADIS
GE Internal Repositories
Public Information Repositories

(* without attachments)

**ANNUAL INSPECTION CHECK LIST
30s COMPLEX RAA**

DOCUMENT REVIEW

Conducted By: Mike Hassett Representing: ARCADIS
Review Start Date: July 28, 2008

1. Check here to confirm that the Grant of Environmental Restriction and Easement has been reviewed.
2. Check here to confirm that the Plan of Restricted Area (as revised if appropriate) has been reviewed.
3. Are there any recorded amendments to or releases from the ERE, and/or any known conditional exceptions under the ERE, and/or any Post-Work Notification Forms (ERE Exhibit E) which have been submitted by the Grantor under the ERE and of which the reviewing party has a copy?
 No
 Yes - If yes, review those items for background informational purposes and list them below (along with the book and page reference in the Registry of Deeds where applicable). (Note that the document reviewer has no obligation to verify the accuracy or completeness of any of these documents, either as of the time they were prepared or as compared to current conditions).

4. Review Completed: August 27, 2008

VISUAL ON-SITE INSPECTION

Conducted By: Mike Hassett Representing: ARCADIS
Inspection Start Date: August 28, 2008

1. List other individuals and their company/agency that were present during the visual on-site inspection.
Jim Gagnon (O'Reilly, Talbot, & Okun on behalf of PED)
Susan Steenstrup (MDEP)

2. Is there any visual evidence of activities and uses of the property since the last inspection that are potentially contrary to the restrictions of the ERE?
 No
 Yes - If yes, describe below.

3. Is there any visual evidence of utility work or building construction, modification, addition, or demolition since the last inspection?
 No
 Yes - If yes, describe below and show the location(s) of such activity on a plan.
A water main was installed, with a portion on the property subject to the ERE (see Figure 1 attached). In addition, demolition and removal of several surface covering features has occurred – e.g., railroad tracks, asphalt, concrete, foundations, and floor slabs. The overall areas where asphalt, concrete, foundations, and floor slabs have been removed are shown on Figure 1. The locations where railroad tracks have been removed are also shown on Figure 1.

ANNUAL INSPECTION CHECK LIST
30s COMPLEX RAA

4. Is there any visual evidence of soil excavation that generated more than 10 cubic yards of soil since the last inspection?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

Excavation has occurred throughout the property, mostly within the surface and no deeper than 6 feet. These excavations were associated with the water main installation and the removal of surface covering features referred to in Item 3 above. As such, the locations of these excavations are the same as those items referenced in Item 3, which are shown on Figure 1.

5. Is there any visual evidence of excessive soil erosion since the last inspection?

No

Yes - If yes, describe below and show the location(s) of such erosion on a plan.

6. Is there any visual evidence of significant pavement construction, disturbance, or excavations since the last inspection?

No

Yes - If yes, describe below and show the location(s) of such activity on a plan.

The vast majority of the paved surfaces within the property have been removed and replaced with topsoil. See Figure 1 attached.

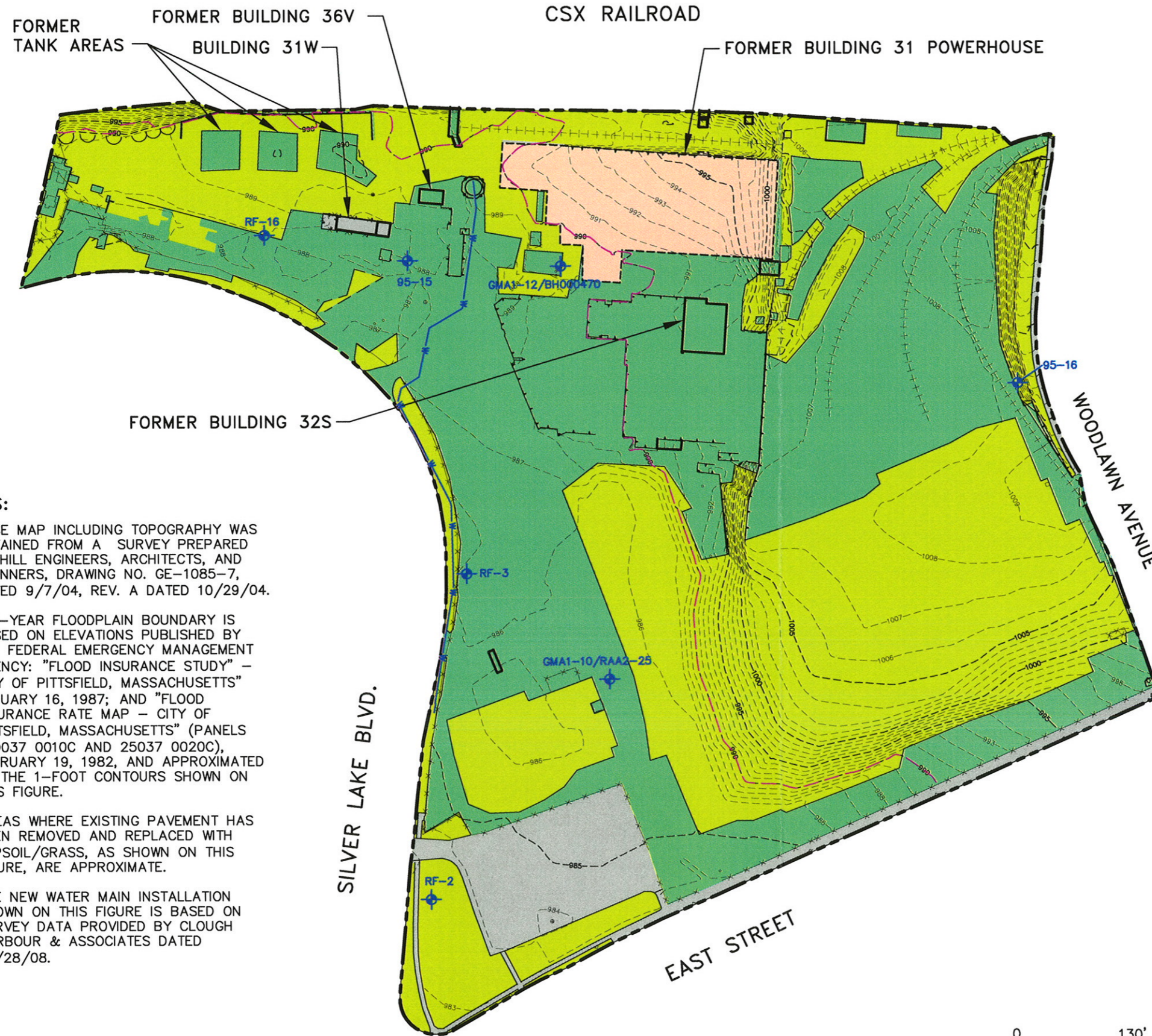
7. If any of the conditions listed in the responses to Questions 3 through 6 appears to have altered the surface grade of the the property compared to the surface grade shown on the topographic survey map included in Attachment C of the Final Completion Report or the most current drawing of such grade (if available), identify the approximate area/location of such grade change on a plan.

The removal of surface-covering features (e.g., railroad tracks, asphalt, concrete, foundations, and floor slabs) and their replacement with topsoil/grass in the areas shown on Figure 1 has likely resulted in minor changes to the surface grade in those areas. However, such minor alterations in grade could not be determined through the visual observation, and new as-built topographic survey data are not currently available.

8. Inspection Completed: August 28, 2008

CITY:SYRACUSE DIV:GROUP:41 DB:NES LD:(Opt) PIC:(Opt) PM:(Reg) TM:(Opt) LVR:(Option)=OFF=PRF
 G:\CAD\GE-CAD\C-ACT\B0030907\000000001\30907\G01.DWG LAYOUT: 1 SAVED: 9/10/2008 2:24 PM ACADVER: 17.05 (LMS TECH) PAGES: 17.05 (LMS TECH) PLOTSTYLETABLE: PLT\FULL.CTB PLOTTED: 9/10/2008 2:24 PM BY: SMITHGALL, NANCY

XREFS: 30907/01 30907/00
 IMAGES: PROJECTNAME: ---



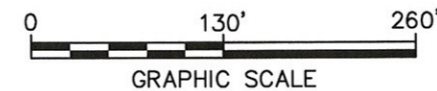
NOTES:

1. BASE MAP INCLUDING TOPOGRAPHY WAS OBTAINED FROM A SURVEY PREPARED BY HILL ENGINEERS, ARCHITECTS, AND PLANNERS, DRAWING NO. GE-1085-7, DATED 9/7/04, REV. A DATED 10/29/04.
2. 100-YEAR FLOODPLAIN BOUNDARY IS BASED ON ELEVATIONS PUBLISHED BY THE FEDERAL EMERGENCY MANAGEMENT AGENCY: "FLOOD INSURANCE STUDY" - CITY OF PITTSFIELD, MASSACHUSETTS JANUARY 16, 1987; AND "FLOOD INSURANCE RATE MAP - CITY OF PITTSFIELD, MASSACHUSETTS" (PANELS 250037 0010C AND 25037 0020C), FEBRUARY 19, 1982, AND APPROXIMATED TO THE 1-FOOT CONTOURS SHOWN ON THIS FIGURE.
3. AREAS WHERE EXISTING PAVEMENT HAS BEEN REMOVED AND REPLACED WITH TOPSOIL/GRASS, AS SHOWN ON THIS FIGURE, ARE APPROXIMATE.
4. THE NEW WATER MAIN INSTALLATION SHOWN ON THIS FIGURE IS BASED ON SURVEY DATA PROVIDED BY CLOUGH HARBOUR & ASSOCIATES DATED 08/28/08.



LEGEND:

- APPROXIMATE LIMITS OF 30s COMPLEX
- X- FENCE
- - - - - RETAINING WALL
- - - - - 1-FOOT CONTOUR INTERVAL
- - - - - 5-FOOT CONTOUR INTERVAL
- o HYDRANT
- o STREET LIGHT
- o SIGNAL
- - - - - APPROXIMATE 100-YEAR FLOODPLAIN BOUNDARY (DASHED WHERE INFERRED)
- UNPAVED (GRASS/DIRT/GRAVEL)
- PAVED (ASPHALT/CONCRETE) CHARACTERIZED USING A NON-PAVEMENT GRID BASED SAMPLING APPROACH
- BUILDING DEMOLITION BARRIER AREA
- MONITORING WELL AND CORRESPONDING SOIL SAMPLING LOCATION
- FORMER LOCATIONS OF RAILROAD TRACKS - REMOVED BETWEEN 2007 AND 2008 ANNUAL INSPECTIONS (SEE NOTE 3)
- FORMER PAVED (ASPHALT/CONCRETE/FOUNDATIONS/FLOOR SLABS) AREAS - ASPHALT/CONCRETE REMOVED BETWEEN 2007 & 2008 ANNUAL INSPECTIONS AND REPLACED WITH TOPSOIL/GRASS (SEE NOTE 3)
- NEW WATER MAIN INSTALLATION (SEE NOTE 4)



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
30s COMPLEX

**AUGUST 28, 2008
 ANNUAL ERE INSPECTION**

