



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted via Overnight Courier*

September 24, 2008

Mr. Richard Fisher  
United States Environmental Protection Agency  
1 Congress Street, Suite 1100 (HBO)  
Boston, MA 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
East Street Area 2-North (GEC140)  
Summary of August/September 2008 Inspection Activities**

Dear Mr. Fisher:

On August 20 and September 17, 2008, the General Electric Company (GE) performed the second post-remediation inspection of the East Street Area 2-North Removal Action Area (RAA) (Figure 1). In accordance with GE's *Final Removal Design/Removal Action Work Plan for East Street Area 2-North* (Final RD/RA Work Plan) and Final RD/RA Work Plan Addendum, as conditionally approved by the U.S. Environmental Protection Agency (EPA), GE conducted soil remediation activities at East Street Area 2-North (at the locations shown on Figure 2), completing those actions in February and March 2008. In addition, restoration actions were conducted in April and May 2008 in accordance with the Final RD/RA Work Plan.

GE conducted an initial post-remediation inspection of East Street Area 2-North on June 11, 2008. That inspection was conducted in accordance with GE's modified Post-Removal Site Control Plan (Attachment E to the Final RD/RA Work Plan) submitted to EPA on October 31, 2007 (Modified Post-Removal Site Control Plan), as conditionally approved by EPA on November 15, 2007. A summary of that inspection was submitted to EPA in a letter dated July 9, 2008.

On August 20, 2008, GE conducted an inspection, consistent with the Modified Post-Removal Site Control Plan, of both the unpaved and paved areas at this RAA that had been backfilled and restored. That inspection inadvertently did not include the other, non-remediated paved areas that GE has elected to maintain as paved, which are also required to be inspected under the Modified Post-Removal Site Control Plan. Accordingly, on September 17, 2008, GE conducted a supplemental inspection of those additional paved areas. These inspections are described below.

#### **Summary of Inspection Activities and Observations**

For the unpaved areas that were backfilled and restored, the August 20, 2008 inspection involved visual observations focusing on the following: (a) evidence of topsoil or gravel erosion (depending on cover type); (b) effectiveness of erosion controls in areas where vegetation is not established, if any; (c) evidence of depressions and/or surface water ponding; (d) any areas where excessive settlement has occurred relative to the surrounding areas; (e) any drainage or growth problems; and (f) other conditions that could jeopardize the performance of the completed remediation actions. In addition, in areas that had been revegetated with grass (no trees or shrubs were planted), the inspection included observations of the vegetation to assess the establishment, coverage, and condition of the vegetation and to ensure that the vegetation is growing as anticipated and providing the desired degree of erosion control.

For the paved areas that GE has elected to maintain as paved (which are shown on Figure E-1 of the Modified Post-Removal Site Control Plan and on Figure 2 herein and include building foundation areas), the Modified Post-Removal Site Control Plan requires the inspection of all those areas which are not covered by buildings at the time of the inspection. As noted above, the August 20, 2008 inspection of the paved areas focused only on those paved areas that were subject to remediation/restoration. This inspection consisted of visual observations focusing on: (a) evidence of excessive cracking, fissures, spalling, rutting, potholes, or exposed subgrade material; (b) evidence of exposed subbase materials; (c) excessive settlement relative to the surrounding areas; (d) any drainage problems; and (e) other conditions that could jeopardize the performance of the completed remediation. The supplemental inspection conducted on September 17, 2008 focused on the other (non-remediated) paved areas that GE has elected to maintain as paved (as shown on Figure 2) and that are not covered by buildings. It consisted of visual observations of those areas for excessive cracking, fissures, spalling, rutting, potholes, or exposed subgrade material.

The August 2008 inspection also included observations of areas where the need for follow-up activities had been identified during the June 2008 inspection. The activities included replacing haybales in an eroded area south of Building 12-T and repairing a small area of pavement north of Building 9-D. Both of these maintenance activities were completed during the June 2008 inspection.

The results of the August/September 2008 inspections are provided in an Inspection Summary and Checklist. The completed inspection form for the August/September 2008 inspections is provided as an attachment to this letter.

As noted in the attached Inspection Summary and Checklist, the August 2008 inspection indicated that all backfilled/restored areas and all herbaceous vegetation planted were in good condition. In the other paved areas subject to inspection, the September 2008 inspection noted the following conditions:

- An area west of Building 10 was identified as needing to be paved (Area 1 on Figure 2);
- An area east of Building 7 and west of Building 14-A was identified as needing to be paved (Area 2 on Figure 2);
- A small paved area near the southwest corner of Building 100-A was identified as needing repair (Area 3 on Figure 2);
- An area south of Building 100-A was identified as needing to be paved (Area 4 on Figure 2);
- An area near the northwest corner of Building 12-T was identified as needing to be paved (Area 5 on Figure 2);
- A small hole was observed in the recently paved area behind Building 12-X (Area 6 on Figure 2); and
- An area near the southeast entrance of Building 100 that was identified as a paved area on Figure E-1 of the Modified Post-Removal Site Control Plan was observed to be unpaved and has been planted with trees and ornamental bushes (Area 7 on Figure 2).

### Maintenance/Repair Activities

Based on the September 2008 inspection, GE will conduct the following maintenance/repair activities this fall:

- Pave Areas 1, 2, 4, and 5 identified on Figure 2;
- Repair the small paved area near the southwest corner of Building 100-A (Area 3 on Figure 2); and
- Repair the small hole observed in the pavement behind Building 12-X (Area 6 on Figure 2).

In addition, GE will discuss with EPA the most appropriate method to address the unpaved and planted area near the southeast entrance of Building 100 that was identified as paved in the Modified Post-Removal Site Control Plan (Area 7 on Figure 2).

### Schedule for Future Inspections

Future inspections at East Street Area 2-North will be conducted in accordance with the applicable requirements of the Modified Post-Removal Site Control Plan – or, following submission and EPA approval of a Final Completion Report for the East Street Area 2-North Removal Action, the Post-Removal Site Control requirements set forth in that report. The unpaved backfilled/restored areas and the paved areas that GE elects to maintain as paved (as well as any paved areas that are covered with a soil cover in the future) will be inspected annually in May (subject to EPA approval of a different frequency), with the next inspection in May 2009. The unpaved backfilled/restored areas will also be inspected following severe storms to verify that these areas have not sustained significant damage. In addition, the revegetated areas will be inspected twice per year for a two-year period after planting (i.e., in May and August or September 2009 and May 2010).

These inspections will utilize the Inspection Summary and Checklist form attached hereto or, following EPA approval of the Final Completion Report, the Inspection Summary and Checklist form included therein. 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.

Sincerely

Richard Gates / ESB

Richard Gates  
Remediation Project Manager

Attachments

cc: Dean Tagliaferro, EPA  
Tim Conway, EPA\*  
John Kilborn, EPA  
Holly Inglis, EPA  
Rose Howell, EPA\*  
K.C. Mitkevicius, USACE  
Michael Gorski, MDEP (2 copies)  
Susan Steenstrup, MDEP  
Anna Symington, MDEP\*  
Jane Rothchild, MDEP\*  
Nancy E. Harper, MA AG\*  
Dale Young, MA EOEEA\*  
Linda Palmieri, Weston  
Mayor James M. Ruberto, City of Pittsfield\*  
Thomas Hickey, Director, PEDDA  
Barbara Landau, BCK Law  
Michael Carroll, GE\*  
Rod McLaren, GE\*  
Peter Wojcik, GE\*  
James Nuss, ARCADIS  
James Bieke, Goodwin Procter  
Public Information Repositories  
GE Internal Repository

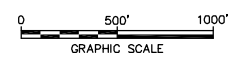
*\*cover letter only*

CITY: SYR DIV/GROUP: 141 DB: DMW LD: DMW PIC: (Opt) PM: (Reqd) TM: (Opt) LVR: ON=OFF=REF=FRZNY  
 G:\CAD\GE-CAD\N-ACT\B004469\000000025\DWG\INSPECT\44469G01.DWG LAYOUT: 1. SAVED: 7/7/2008 1:21 PM ACADVER: 17.05 (LMS TECH) PAGESETUP: --- PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 7/8/2008 11:17 AM BY: WODARCZYK, DAVID  
 XREFS: IMAGES: PROJECTNAME: ---



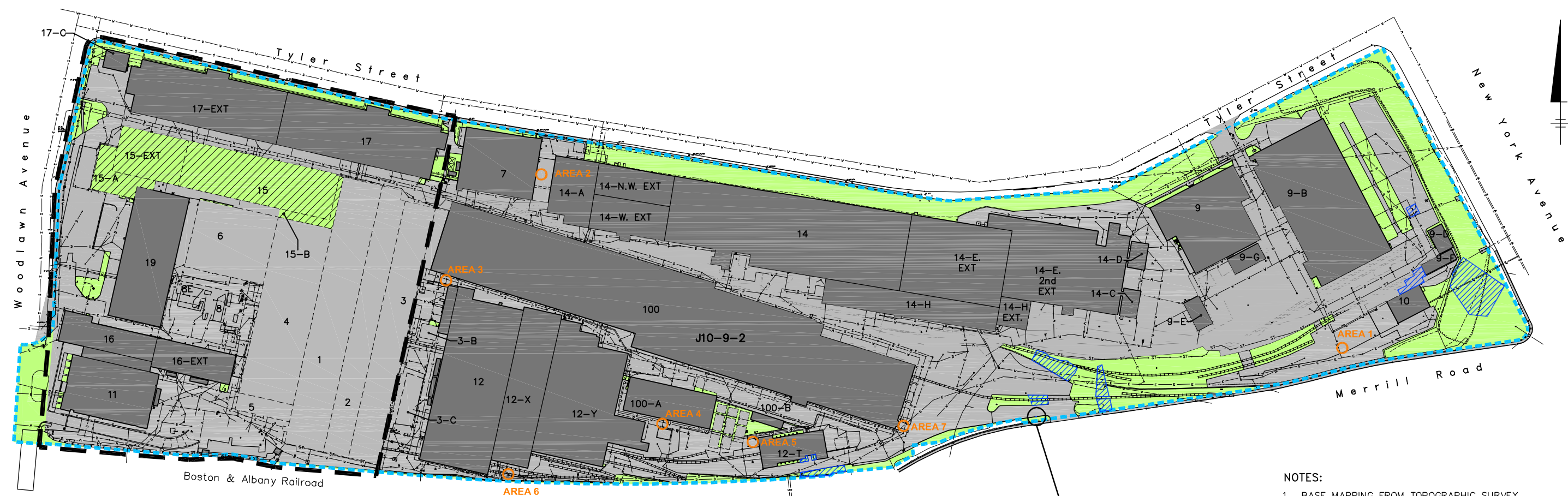
**LEGEND:**  
 EAST STREET AREA 2-NORTH  
 APPROXIMATE REMOVAL ACTION AREA BOUNDARY

**NOTES:**  
 1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1990; DATA PROVIDED BY GENERAL ELECTRIC COMPANY; AND BLASLAND AND BOUCK ENGINEERS, P.C. CONSTRUCTION PLANS.  
 2. NOT ALL PHYSICAL FEATURES SHOWN.



GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS <b>EAST STREET AREA 2-NORTH</b>	
<b>REMOVAL ACTION AREA</b>	
	<b>FIGURE</b> <span style="font-size: 24pt; font-weight: bold;">1</span>

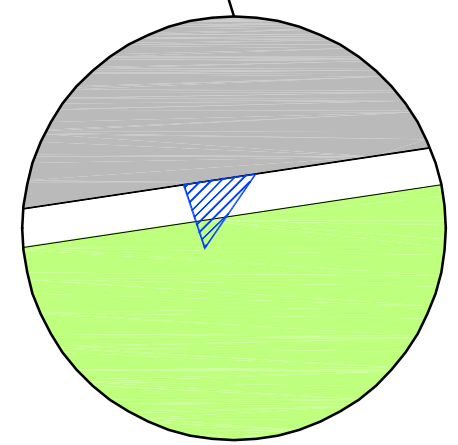
CITY:SYRACUSE DIV:GROUP:141 DB:DMWLAF:DMW LD:DMW PIC: PAK: TM: LVR:ON:OFF:REF: G:\CAD\GE-CAD\NACT\B00040469\000\00025\DWG\INSPECTION\14469G03.DWG LAYOUT: 2\_SAVED: 9/23/2018 4:40 PM ACADVER: 17.05 (LMS TECH) PAGES: 17.05 (LMS TECH) PLOTSTYLETABLE: PLT\ULLCTB.PLOTSTYLETABLE: C:\D2B-PDF PLOTTED: 9/23/2018 4:40 PM BY: WODARCZYK, DAVID XREFS: 40469X01 40469X02



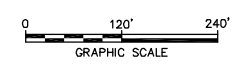
- NOTES:**
1. BASE MAPPING FROM TOPOGRAPHIC SURVEY (DRAWING S2059W01) BY FORESIGHT LAND SURVEYORS DATED 2/9/05.
  2. NOT ALL PHYSICAL FEATURES SHOWN.

**LEGEND**

	REMOVAL ACTION AREA BOUNDARY		STORM SEWER
	OPEN SOIL/VEGETATED AREA		SANITARY SEWER
	BUILDING FOUNDATIONS THAT HAVE BEEN CHARACTERIZED AND EVALUATED AS UNPAVED		WATER MAIN / FIRE PROTECTION MAIN
	PAVED AREA SUBJECT TO INSPECTION		STEAM LINE
	SOIL REMOVAL AREA		NATURAL GAS MAIN
	BUILDING		ELECTRIC/TELEPHONE CONDUIT
	BUILDING ID		LIGHT POLE
	AREA IDENTIFIED AS NEEDING MAINTENANCE/REPAIR		CATCH BASIN
	APPROXIMATE AREA TO BE TRANSFERRED TO PITTSFIELD ECONOMIC DEVELOPMENT AUTHORITY (PEDA)		DRAIN MANHOLE
			UTILITY POLE
			GAS VALVE
			FIRE HYDRANT
			WATER SHUTOFF



**REMOVAL AREA DETAIL**  
SCALE: 1"=2'



GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
**EAST STREET AREA 2 - NORTH**

**AREAS SUBJECT TO INSPECTION**

FIGURE  
**2**

INSPECTION SUMMARY AND CHECKLIST

EAST STREET AREA 2 - NORTH

PARCEL J10-9-2

I. GENERAL INFORMATION

Inspection Date: 8/20/2008; pavement inspection 9/17/2008  
Conducted By/Phone Number: Gregg Rabasco / (413) 822-1184  
Weather Conditions: Sunny, 65-70°F  
Date of Last Inspection: 6/11/2008

II. INSPECTION SUMMARY

1. **Soil Backfill Areas** (Note evidence of erosion, excessive settlement, surface water ponding, burrows, vehicle ruts; excavation activities, unauthorized uses of areas, etc.)

- All areas in good condition.

2. **Vegetation Area** (Note general condition of vegetative cover (e.g., evidence of stressed/sparse cover) and other landscaping items (trees, shrubs, etc.)

- Vegetative cover in good condition. No trees or shrubs planted.

3. **Paved Areas Subject to Inspection** (Inspect the paved areas that are identified on Figure E-1 of the Revised Attachment E to the Final RD/RA Work Plan (Attachment E - Post-Removal Site Control Plan), and note evidence of any locations where the pavement is broken up and/or missing and soil is clearly visible.)

- An area west of Building 10 was identified as needing to be paved (see Area 1 on Figure 2).
- An area east of Building 7 and west of Building 14-A was identified as needing to be paved (see Area 2 on Figure 2).
- A small paved area near the southwest corner of Building 100-A was identified as needing repair (see Area 3 on Figure 2).
- An area south of Building 100-A was identified as needing to be paved (see Area 4 on Figure 2).
- An area near the northwest corner of Building 12-T was identified as needing to be paved (see Area 5 on Figure 2).
- A small hole was observed in the recently paved area behind Building 12-X that was identified as needing repair (see Area 6 of Figure 2).
- An area near the southeast entrance of Building 100 that was identified as a paved area on Figure E-1 of the Modified Post-Removal Site Control Plan was observed to be unpaved and has been planted with trees and ornamental bushes (see Area 7 on Figure 2).

4. **Other Observations** (Note any other general observations, including parcel-specific restoration activities.)

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Pave four areas identified as needing to be paved (see Areas 1, 2, 4 and 5 on Figure 2).
- Repair paved area near southwest corner of Building 100-A (see Area 3 on Figure 2).
- Repair small hole observed behind Building 12-X (see Area 6 on Figure 2).
- Discuss with EPA appropriate means to address the unpaved area near the southeast entrance of Building 100 (Area 7 on Figure 2).

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE