



GE  
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USA

*Transmitted Via Overnight Courier*

October 16, 2008

Mr. Richard Hull  
EPA Project Coordinator  
United States Environmental Protection Agency  
One Congress Street, Suite 1100  
Boston, MA 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
Building 71 and Hill 78 On-Plant Consolidation Areas (GEC210 & GEC220)  
Summary of Fall 2008 Post-Closure Inspection Activities**

Dear Mr. Hull:

Consistent with the requirements set forth in Section 9 of the June 1999 *Detailed Work Plan for On-Plant Consolidation Areas* (Detailed Work Plan) for post-closure care, the General Electric Company (GE) conducted a post-closure inspection of the Building 71 On-Plant Consolidation Area (OPCA) and the capped portion of the Hill 78 OPCA. The post-closure inspection was performed on GE's behalf by ARCADIS on September 17, 2008 and generally included the Building 71 and Hill 78 OPCAs final cover area and associated components. Also present during the inspection was U.S. Environmental Protection Agency (EPA) and Weston Solutions, Inc.

Provided below is a description of the inspection activities performed during the Fall 2008 inspection, as well as a summary of the results of the inspection (including items requiring maintenance). A progress summary of maintenance activities performed subsequent to the Spring 2008 inspection is also provided in the post-closure inspection form (Attachment 1).

### **Inspection Activities**

In accordance with Section 9 of the Detailed Work Plan, the Fall 2008 post-closure inspection consisted of visual observations of the Building 71 and Hill 78 OPCAs final cover and surrounding area to identify the overall condition of the final cover and associated components, as well as items needing maintenance. The Building 71 and Hill 78 OPCAs final cover area were visually inspected to identify the presence of any of the following conditions, which could affect the overall integrity of the final cover:

- areas void of vegetation or exposed geosynthetic final cover components;
- evidence of erosion or stressed vegetation;
- evidence of burrowing animals;
- apparent surface settlement;
- ponding water conditions;

- undesirable/insufficient vegetative growth;
- undesirable slope conditions (i.e., non-conducive to positive drainage);
- excessive wheel rutting; and
- obstructed drainage features.

In addition to inspecting the final cover, the post-closure inspection included observations of the following associated components:

- paved site access roads;
- the final cover access road;
- surface water drainage system, including the north and south stormwater basins;
- the leachate handling system; and
- perimeter vegetation.

The conditions observed for each of these components are listed on the post-closure inspection form (Attachment 1).

### **Inspection Results**

The results of the Fall 2008 post-closure inspection were recorded on the attached inspection form. A site figure is also attached to this letter (Attachment 2) that depicts (by reference to the corresponding letter and number on the inspection form) the approximate locations of the items identified as requiring maintenance.

In general, the Fall 2008 post-closure inspection indicated that the Building 71 and Hill 78 OPCAs final cover areas are in good overall condition. As shown in Section II of the inspection form, five items were noted during the post-closure inspection for follow-up maintenance. Some of the items were observed at multiple locations (see Attachment 2). The more significant of these items are:

- erosion on the northeast slope of the Hill 78 OPCA;
- evidence of burrowing animals;
- sediment accumulation at three locations near culvert pipes;
- areas void of vegetation within the southern sedimentation basin; and
- unnecessary temporary silt fences and drainage pipes on the Hill 78 OPCA.


Further details regarding the maintenance items noted during the post-closure inspection, as well as recommendations for addressing these items, are provided on the inspection form (Attachment 1). Photographs taken during the inspection are also included as an attachment to this letter (Attachment 3).

### **Schedule for Future Inspections**

In accordance with Section 9 of the Detailed Work Plan, the closed portions of the OPCAs will be inspected approximately every six months to assess the integrity of the final cover and associated components. The next post-closure inspection will be performed in the Spring of 2009. The inspections will continue until GE proposes, and the EPA approves, a modification or termination of such inspections. Future post-closure inspection reports will also include a progress summary of the maintenance activities identified during the prior inspection period.

Please call me if you have any comments or questions concerning the Fall 2008 inspection.

Sincerely,

  
Richard Gates  
Remediation Project Manager

Attachment

cc: Dean Tagliaferro, EPA  
Richard Fisher, EPA  
Tim Conway, EPA  
John Kilborn, EPA  
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Roderic McLaren, GE\*  
James Nuss, ARCADIS  
James Bieke, Goodwin Procter  
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GE Internal Repository

*\*cover letter only*

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**Attachments**

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**Attachment 1**

Inspection Form

**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
BUILDING 71 AND HILL 78 ON-PLANT CONSOLIDATION AREAS (OPCAs)**

**POST-CLOSURE INSPECTION FORM**

**I. Inspection Information**

Inspection Date: September 17, 2008 (Wednesday) Weather Conditions: Sunny/50-72°F  
Winds light and variable

Inspection Area: Building 71 OPCA/Capped portion of Hill 78 OPCA Final Cover and ancillary site components

Performed by: Robert J. Papallo (ARCADIS)

Observed by: Michael Argue (Weston Solutions, Inc.) and Richard Hull (EPA)

Time Arrived: 1:30 PM Time Departed: 3:15 PM

Date of Prior Inspection: May 16, 2008

**II. Observations**

**Column A    Column B**

A. Site Access Road			
	1. Is there excessive cracking, potholes, visible fissures, or spalling?	<input type="checkbox"/> No	Yes
	2. Are the subbase materials exposed in an unsatisfactory manner?	<input type="checkbox"/> No	Yes
B. Final Cover Access Road			
	1. Is there excessive erosion or rutting of road surface?	<input type="checkbox"/> No	Yes
	2. Is there undesirable vegetative growth?	<input type="checkbox"/> No	Yes
C. Site Security			
	1. Are the access gates and locks in operating condition?	<input type="checkbox"/> Yes	No
	2. Is the perimeter fence in satisfactory condition (i.e., in proper position, adequately secured to fence posts, etc.)?	<input type="checkbox"/> Yes	No
	3. Are the posted signs on the perimeter fence securely attached to fence and visible?	<input type="checkbox"/> Yes	No
D. Final Cover System			
	1. Are there bare spots (i.e., areas void of vegetation) or exposed geosynthetic cover components?	<input type="checkbox"/> No	Yes
	2. Is there excessive erosion or stressed vegetation?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	3. Is there evidence of burrowing animals?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	4. Is there evidence of settlement?	<input type="checkbox"/> No	Yes
	5. Is there evidence of ponding water conditions?	<input type="checkbox"/> No	Yes
	6. Is there sparse or undesirable vegetative growth?	<input type="checkbox"/> No	Yes
	7. Are the slopes adequate for surface water drainage?	<input type="checkbox"/> Yes	No
	8. Is there evidence of excessive wheel rutting?	<input type="checkbox"/> No	Yes
	9. Are cover system drainage layer outlet pipes visible and free of obstructions?	<input type="checkbox"/> Yes	No
E. Surface Water Drainage System			
	1. Does established vegetation provide adequate erosion protection?	<input type="checkbox"/> Yes	No
	2. Are there noticeable obstructions (i.e., sediment accumulation, debris, etc.)?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	3. Are there bare spots (i.e., areas void of vegetation) or excessive erosion on stormwater basin berm slopes?	<input type="checkbox"/> No	<input type="checkbox"/> Yes
	4. Are the stormwater basin inlet and outlet features (i.e., riprap forebay and concrete manhole) functioning and free of excessive sediment and debris buildup?	<input type="checkbox"/> Yes	No
	5. Are the drainage culverts functioning properly (i.e., unobstructed inlet/outlet, pipe ends un-damaged, etc.)?	<input type="checkbox"/> Yes	No
F. Leachate Handling System			
	1. Are the pumps in operating condition?	<input type="checkbox"/> Yes	No
	2. Are the leachate storage tanks in satisfactory condition?	<input type="checkbox"/> Yes	No
	3. Is the leachate collection manhole in satisfactory condition?	<input type="checkbox"/> Yes	No
	4. Are the usable leachate transfer pipes in satisfactory condition?	<input type="checkbox"/> Yes	No
	5. Is the auto dialer warning system in operating condition?	<input type="checkbox"/> Yes	No
	6. Is the flow meter in operating condition?	<input type="checkbox"/> Yes	No
	7. Are the float levels in operating condition?	<input type="checkbox"/> Yes	No
G. Perimeter Vegetation			
	1. Does the vegetation provide for adequate erosion protection?	<input type="checkbox"/> Yes	No
	2. Are there bare spots (i.e., areas void of vegetation) or excessive erosion?	<input type="checkbox"/> No	Yes
	3. Is there undesirable vegetative growth?	<input type="checkbox"/> No	Yes
H. Other			
	1. Are there additional conditions that were observed and noted during the inspection?	No	<input type="checkbox"/> Yes

Notes:

**GENERAL ELECTRIC COMPANY - PITTSFIELD, MASSACHUSETTS  
BUILDING 71 AND HILL 78 ON-PLANT CONSOLIDATION AREAS (OPCAs)**

**POST-CLOSURE INSPECTION FORM**

**III. Inspection Observations**

Describe observations from Column B in Section II. Use additional pages if necessary.

(Locations of the following items are depicted on the Inspection figure.)

- D2 Erosion was noted under the temporary drainage pipe on the northeast slope of Hill 78.
- D3 An animal burrow hole was noted on the plateau of Building 71 OPCA west of the retaining wall.
- E2 Sediment accumulation was observed within the perimeter drainage ditch near the ends of the final cover outlet pipes and the inlet of the culvert adjacent to the west side of the retaining wall. Sediment accumulation was also observed within the midslope swale at both ends of the culvert adjacent to the Building 71 OPCA access road.
- E3 Two areas on the sideslopes of the southern sedimentation basin are void of vegetation.
- H1 There is unnecessary temporary silt fencing and temporary drainage pipes on the northern and southern top of slope of the Hill 78 OPCA.

**IV. Inspection Response Actions**

Describe response actions to be conducted for each observation noted in Section III above. Use additional pages if necessary.

- D2 Erosion should be filled with topsoil and reseeded after the temporary drainage pipe is removed.
- D3 The burrowing animals should continue to be removed on an ongoing basis. Borrow holes should be continually filled with topsoil and seeded..
- E2 Sediment accumulation at the three locations mentioned above should be removed.
- E3 The locations of void vegetation should be reseeded and mulched.
- H1 Temporary silt fencing and temporary drainage pipes should be removed.

**V. Prior Inspections**

Describe response actions conducted to address prior maintenance needs.

- A1. Cracks and/or spalling at the pavement edges were sealed.
- C2. Permanent fencing was installed after completion of the sanitary sewer/storm drain pipe re-routing project.
- D1. The location of sparse vegetation was reseeded and mulched.
- D3. The burrowing animals should continue to be removed from the OPCAs and the burrow holes filled with topsoil, seeded, and mulched as needed.
- H1.a The dead tree and branches on the northwest corner of the Building 71 OPCA were be removed and disposed of.
- H1.b The degraded hay bales were removed from the Southern Sedimentation Basin.

**VI. Other Observations**

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**Attachment 2**

Site Figure





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**Attachment 3**

Photographs



Description: View of Hill 78 OPCA northern sideslope (looking east)



Description: View of Hill 78 OPCA southern sideslope (looking northeast)



Description: View of Building 71 OPCA southern sideslope (looking east)



Description: View of Building 71 OPCA and Southern Stormwater Basin (looking north)



Description: View of Building 71 OPCA (looking north)



Description: View of Building 71 OPCA northern sideslope and North Sedimentation Basin (looking east)



Description: View of Hill 78 OPCA plateau (looking east)



Description: View of Hill 78 and Building 71 OPCA plateau (looking east)



Description: View of Building 71 OPCA plateau (looking west)