

GE 159 Plastics Avenue Pittsfield, MA 01201 USA

Transmitted via Overnight Courier

July 11, 2007

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

Re: 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 May 2007 Inspection Activities for the Phase 4 Floodplain Properties

Dear Mr. Tagliaferro:

On May 25, 2007, the General Electric Company (GE) performed its second post-remediation inspection of several properties located within the floodplain adjacent to the 1½ Mile Reach of the Housatonic River that have been identified as being in Phase 4 of the 1½ Mile Floodplain Removal Action Areas. These properties are divided into three groups (Group 4A, 4B, and 4C), as depicted on Figure 1, and consist of five residential properties and six recreational properties. The remediation of these properties was completed summer 2006, and those portions of the properties that were subject to remediation by GE were inspected.

GE conducted the initial post-remediation inspection of these properties on September 20, 2006. A summary of the September 2006 inspection activities was submitted to the U.S. Environmental Protection Agency (EPA) in a letter dated October 11, 2006. On May 25, 2007, GE conducted the second post-remediation inspection of these properties in accordance with Section 10.3 of GE's August 2005 Removal Design/Removal Action Work Plan for the Phase 4 Floodplain Properties (Phase 4 Work Plan) and with the Site Restoration Plan which was Attachment E to GE's April 14, 2006 Supplemental Information Package for the Phase 4 Floodplain Properties. Consistent with the initial inspection, this inspection was performed for areas that were backfilled and restored during the implementation of the remediation actions.

Summary of Inspection Activities

The May 2007 inspection consisted of visual observations of the backfilled/restored areas, focusing on the following: (a) erosion controls to verify their continued effectiveness until such time as vegetation is sufficiently established; (b) any areas where excessive settlement has occurred relative to the surrounding areas; (c) any drainage or growth problems due to possible over-compaction of backfill materials; and (d) other conditions that could jeopardize the completed remediation. The inspection also evaluated whether the vegetation that has been planted or seeded is growing as anticipated and providing the desired degree of erosion control.

The May 2007 inspection also included observations of properties/areas at which the need for follow-up activities had been identified during the prior inspection. As indicated in GE's October 11, 2007 report related to the September 2006 inspection, follow-up activities included: checking the condition of trees and shrubs and reseeding certain areas following tree/shrub installations. Other follow-up activities were primarily related to Parcel I7-1-101 and included: 1) verifying that tire ruts within the tree planting area had been addressed and 2) verifying that adequate vegetation had been established between the top-of-bank and the paved access road and in the unpaved access road following restoration activities. All of these areas were observed in good overall condition during the May 2007 inspection.

To document the results of the May 2007 inspection, GE completed an Inspection Summary and Checklist for each property subject to inspection. Copies of the completed forms are provided in Attachment A. These forms will also be used in the future to continue to document such inspections and track the completion of identified maintenance activities.

Summary of Observations During Inspection

In summary, the May 2007 inspection indicated that some of the Phase 4 properties will require minor maintenance. As noted on the attached forms, maintenance activities include:

4A properties:

• Monitoring stressed/sparse vegetation on Parcel I7-1-101.

4B properties:

• Replacing 2 dead pine trees on Parcel I6-1-66 (to be replaced by EPA).

4C properties:

- Replacing dead 1.5- to 2-inch diameter maple trees and monitoring stressed trees on Parcels I6-1-62, -103, -104, and -106;
- Replacing dead riverbank maples and monitoring stressed trees on Parcels I6-1-62, -103, -104, and -106; and
- Informing the City of Pittsfield about a manhole breach.

GE will coordinate with EPA to replace the pine tree on Parcel I6-1-66. The other trees referenced above will be replaced prior to the fall 2007 inspection (based on tree availability and weather conditions). In addition, the condition of the trees and vegetation showing signs of stress will be checked during the fall 2007 inspection to ensure adequate growth. Finally, GE has informed the City of Pittsfield of the manhole breach.

Schedule for Future Inspections

In accordance with Technical Attachment J to the SOW, backfilled/restored areas are to be inspected approximately every 6 months for a period of one year and annually thereafter (subject to EPA approval of a different frequency). Future inspections are anticipated to occur in the fall of each year. 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/EGB

Richard Gates Remediation Project Manager

Attachment

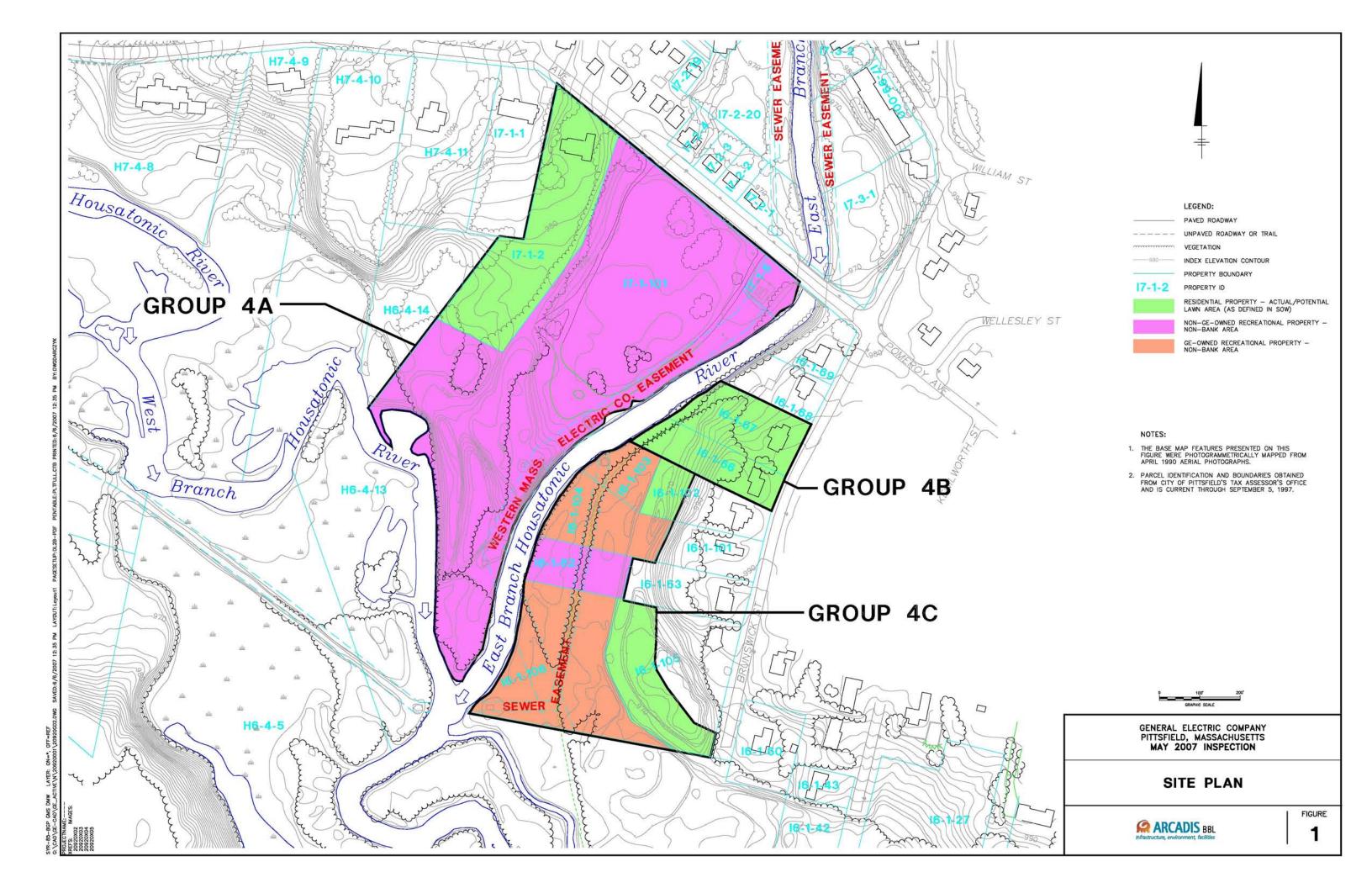
cc: Rose Howell, EPA*
Holly Inglis, EPA
Tim Conway, EPA*
John Kilborn, EPA
K.C. Mitkevicius, USACE
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Joanne Flescher, MDEP*
Nancy E. Harper, MA AG*
Dale Young, MA EOEA*
Mayor James Ruberto, City of Pittsfield*
Linda Palmieri, Weston
Michael Carroll, GE*
Andrew Silfer, GE

Rod McLaren, GE*
James Nuss, ARCADIS BBL
James Bieke, Goodwin Procter
Property Owner — Parcel I6-1-62
Property Owner — Parcel I6-1-66
Property Owner — Parcel I6-1-67
Property Owner — Parcel I6-1-102
Property Owner — Parcel I6-1-105
Property Owner — Parcel I7-1-2
Property Owner — Parcel I7-1-5
Property Owner — Parcel I7-1-101
Public Information Repositories
GE Internal Repository

^{*} cover letter only



Figure



ARCADIS BBL

Attachment A

Inspection Summary and Checklist

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

PARCEL 17-1-101 (Group 4A)

1. C	GENERAL INFORMATION	ON CONTRACTOR OF THE PROPERTY
l .	5	E 10E 10007
	pection Date:	5/25/2007
Conducted By:		Paolo Filippetti
•	ather Conditions:	Sunny 80°F
Dat	te of Last Inspection:	9/20/2006
II.	INSPECTION SUMMAR	Y Y
1.		Note any physical changes since last inspection; note evidence of excessive settlement, surface water
<u> </u>		icle ruts; excavation activities, unauthorized uses of areas, etc.)
 -	All areas in good cond	lition.
2.	Vegetation Area (Not	te any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of r) and other landscaping items (trees, shrubs, etc.)
_		r along path to confluence (EPA responsibility).
<u> </u>	Sulesseu/sparse cove	along pain to confidence (EFA responsibility).
3.		(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any tions, including parcel-specific restoration activities.)
-	None	
III.	FOLLOW-UP MAINTE	NANCE AND REPAIR ACTIVITIES
- T	Monitor stressed/spar	se vegetation.

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

PARCEL 16-1-66 (Group 4B)

Same (2), 21	: / (Cloup 42)			
I. G	SENERAL INFORMATION	ON CONTRACTOR OF THE PROPERTY		
	ection Date:	5/25/2007		
Conducted By: Weather Conditions:		Paolo Filippetti		
		Sunny 80°F		
Date	e of Last Inspection:	9/20/2006		
<u> </u>				
	NSPECTION SUMMAR			
1.		Note any physical changes since last inspection; note evidence of excessive settlement, surface water		
		icle ruts; excavation activities, unauthorized uses of areas, etc.)		
-	All areas in good cond	lition.		
<u> </u>				
2.		te any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of r) and other landscaping items (trees, shrubs, etc.)		
<i>-</i>	Two dead pines (EPA	<u> </u>		
_				
	······································			
-				
3.		(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any tions, including parcel-specific restoration activities.)		
<u> </u>	None			
	740110			
┢				
├				
-				
111	EOU OW-UP MAINTE	NANCE AND REPAIR ACTIVITIES		
*111				
<u> </u>	EPA to replace two de	ead pines.		
 				
<u> </u>				
ļ				
<u> </u>				
 				
L				

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

PARCEL I6-1-67 (Group 4B)

I. GENERAL INFORMAT	ION
Incorportion Date:	F/0F/0007
Inspection Date:	5/25/2007
Conducted By:	Paolo Filippetti
Weather Conditions:	Sunny 80°F
Date of Last Inspection:	9/20/2006
II. INSPECTION SUMMA	
	Note any physical changes since last inspection; note evidence of excessive settlement, surface water
	hicle ruts; excavation activities, unauthorized uses of areas, etc.)
 All areas in good con 	dition.
	ote any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of er) and other landscaping items (trees, shrubs, etc.)
 All areas in good con 	<u> </u>
	(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any ations, including parcel-specific restoration activities.)
- None	
III. FOLLOW-UP MAINTE	NANCE AND REPAIR ACTIVITIES
- None	

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

PARCEL 16-1-62 (Group 4C)

I. GENERAL INFORMATION		
مما	naction Data	E/0E/0007
	pection Date: nducted By:	5/25/2007
	•	Paolo Filippetti Sunny 80°F
Weather Conditions: Date of Last Inspection:		9/20/2006
Dai	e or Last Inspection.	9/20/2006
)).	INSPECTION SUMMAR	
1.		Note any physical changes since last inspection; note evidence of excessive settlement, surface water
		nicle ruts; excavation activities, unauthorized uses of areas, etc.)
<u> </u>	All areas in good cond	dition.
L		
2.		te any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of
<u> </u>		r) and other landscaping items (trees, shrubs, etc.)
<u> </u>	,	ch diameter maple trees are stressed and/or dead.
<u> </u>	Several riverbank ma	ples (wetland plantings) are stressed and/or dead.
<u> </u>		
<u> </u>		
<u> </u>		
3.		(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any ations, including parcel-specific restoration activities.)
-	None	
┢	110110	
 		
<u> </u>		
\vdash		
├─		
111.	FOLLOW-UP MAINTE	NANCE AND REPAIR ACTIVITIES
		n diameter maples and monitor stressed trees.
<u> </u>		nk maples and monitor stressed trees.
 	Tropidos doda Hivorida	The map to and mornior of occord wood.
\vdash		
-		

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

PARCEL 16-1-102 (Group 4C)

I. C	SENERAL INFORMATION	ON
		F (0.5 (0.00)
	pection Date:	5/25/2007
	nducted By:	Paolo Filippetti
l .	ather Conditions:	Sunny 80°F
Dat	e of Last Inspection:	9/20/2006
II.	INSPECTION SUMMAR	XX
1.		Note any physical changes since last inspection; note evidence of excessive settlement, surface water
ļ		nicle ruts; excavation activities, unauthorized uses of areas, etc.)
<u> </u>	All areas in good cond	lition.
┡		
 		
 		
2.		te any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of r) and other landscaping items (trees, shrubs, etc.)
<u> </u>	All areas in good cond	
F	All areas in good cone	
<u> </u>		
3.		(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any itions, including parcel-specific restoration activities.)
-	None	
111.	FOLLOW-UP MAINTE	NANCE AND REPAIR ACTIVITIES
<u> </u>	None	
<u> </u>		
<u> </u>		
<u> </u>		

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

PARCEL I6-1-103 (Group 4C)

I CENERAL INFORMATION		
1. (GENERAL INFORMATIO	
Inc	paction Date:	5/25/2007
	spection Date:	Paolo Filippetti
Conducted By: Weather Conditions:		Sunny 80°F
υäi	te of Last Inspection:	9/20/2006
II.	INSPECTION SUMMAR	
1.		lote any physical changes since last inspection; note evidence of excessive settlement, surface water
_		icle ruts; excavation activities, unauthorized uses of areas, etc.)
-	All areas in good cond	ition.
2.		e any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of
		and other landscaping items (trees, shrubs, etc.)
-		ch diameter maple trees are stressed and/or dead.
-	Several riverbank map	oles (wetland plantings) are stressed and/or dead.
3.	Other Observations /	Confirm that repair/maintenance measures identified during prior inspection have been performed; note any
٠.		tions, including parcel-specific restoration activities.)
	None	
	INOID	
111	FOLLOW-UP MAINTEN	NANCE AND REPAIR ACTIVITIES
- <u></u>		diameter maples and monitor stressed trees.
		nk maples and monitor stressed trees.
	. topiado abaa iivolbai	The state of the s
-		
-		
		

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

PARCEL I6-1-104 (Group 4C)

I. GENERAL INFORMATION		
		5/05/000
	pection Date:	5/25/2007
Conducted By: Weather Conditions:		Paolo Filippetti
		Sunny 80°F
Dat	e of Last Inspection:	9/20/2006
	INSPECTION SUMMAR	RY
1.		Note any physical changes since last inspection; note evidence of excessive settlement, surface water
		hicle ruts; excavation activities, unauthorized uses of areas, etc.)
-	All areas in good cond	dition.
_		
2.	Vegetation Area (No	te any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of
	stressed/sparse cove	er) and other landscaping items (trees, shrubs, etc.)
		nch diameter maple trees are stressed and/or dead.
-	Several riverbank ma	ples (wetland plantings) are stressed and/or dead.
	·	
3.		(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any ations, including parcel-specific restoration activities.)
-	None	
1022 1		
111.		NANCE AND REPAIR ACTIVITIES
		h diameter maples and monitor stressed trees.
<u> </u>	Replace dead riverba	nk maples and monitor stressed trees.
<u> </u>		
<u> </u>		
\vdash		
<u> </u>		

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

PARCEL I6-1-105 (Group 4C)

2000		
I. C	SENERAL INFORMATION	DN
	pection Date:	5/25/2007
Conducted By: Weather Conditions:		Paolo Filippetti
		Sunny 80°F
Dat	e of Last Inspection:	9/20/2006
ll. I	INSPECTION SUMMAR	?Y
1.	Soil Backfill Areas (/	Note any physical changes since last inspection; note evidence of excessive settlement, surface water
	ponding, burrows, veh	nicle ruts; excavation activities, unauthorized uses of areas, etc.)
	All areas in good cond	lition.
2.		te any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of r) and other landscaping items (trees, shrubs, etc.)
-	All areas in good cond	lition.
3.		(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any tions, including parcel-specific restoration activities.)
-	None	
III.	FOLLOW-UP MAINTE	NANCE AND REPAIR ACTIVITIES
-	None	

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

PARCEL 16-1-106 (Group 4C)

I. GENERAL INFORMATION		
	<u>arin tarang 1917, ang palikinaki Berrenia (19</u> 77)	
Insp	pection Date:	5/25/2007
Conducted By: Weather Conditions:		Paolo Filippetti
		Sunny 80°F
Date	e of Last Inspection:	9/20/2006
II. I	NSPECTION SUMMAR	
1.		Note any physical changes since last inspection; note evidence of excessive settlement, surface water
		icle ruts; excavation activities, unauthorized uses of areas, etc.)
-	All areas in good cond	lition.
2.		le any physical changes since last inspection; note general condition of vegetative cover (e.g., evidence of
		r) and other landscaping items (trees, shrubs, etc.)
-		ch diameter maple trees are stressed and/or dead.
-	Several riverbank map	oles (wetland plantings) are stressed and/or dead.
ļ		
2	Other Cheenistians	Confirms that we reinforce interest and response to the stiffered devices which in proceedings have been proceedings to the con-
3.		(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any tions, including parcel-specific restoration activities.)
<u> </u>		long southern boundary of Parcel I6-1-106 has been breached. Manhole is located at junction of
	north/south trunk line	and west trunk line that crosses Housatonic River just south of confluence.
Ш.		NANCE AND REPAIR ACTIVITIES
<u> </u>		diameter maples and monitor stressed trees.
		nk maples and monitor stressed trees.
	Inform City of Pittsfield	d about manhole breach.
<u></u>		
L		