



GE
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Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

September 23, 2010

Ms. Karen Pelto
Case Manager
Bureau of Waste Site Cleanup
Massachusetts Department of Environmental Protection
One Winter Street, 8th Floor
Boston, Massachusetts 02108

**Re: GE-Pittsfield/Housatonic River Site
Newell Street Area II (GECD450)
Summary of August 2010 Inspection of Natural Resource Restoration/Enhancement
Measures**

Dear Ms. Pelto:

On August 25, 2010, the General Electric Company (GE) performed the seventh inspection of the natural resource restoration/enhancement (NRR/E) measures at Newell Street Area II. As shown on Figure 1, the areas subject to NRR/E measures consist of the majority of the GE-owned former Newell Street parking lot area, which has been covered with a vegetative engineered barrier, and a portion of the former "wooded area" at Parcel J9-23-12. The NRR/E measures installed in these areas consist of the planting of an herbaceous native grassland community, as well as the placement of a bluebird box on the edge of the parking lot area adjacent to the Housatonic River. This letter provides some background information on these measures and presents the results of the August 25, 2010 inspection.

Background

The NRR/E measures required to be installed at Newell Street Area II were specified in the Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site and associated *Statement of Work for Removal Actions Outside the River* (SOW), as supplemented by GE's *Final Removal Design/Removal Action Work Plan for Newell Street Area II* (Final Work Plan; March 2005) and the *Final RD/RA Work Plan Addendum for Newell Street Area II* (Final Work Plan Addendum; May 2005), as approved by the U.S. Environmental Protection Agency (EPA). These measures consisted of the following:

- The planting of an herbaceous native grassland community on the surface of the vegetative engineered barrier at the Newell Street parking lot area (excluding the paved access road), as well as in a portion of the former "wooded area" on Parcel J9-23-12 shown on Figure 1, using a mixture of native grass and wildflower species proposed in the Final Work Plan Addendum and approved by EPA; and
- The installation of a bluebird box along the edge of the former parking lot area adjacent to the Housatonic River.

In accordance with a request from the Natural Resource Trustees (Trustees) in a letter dated June 10, 2005, GE did not place stumps and rock piles within the NRR/E area. The requirements for monitoring and maintenance of the NRR/E measures, in accordance with Attachment I to the SOW, were set out in the *Restoration Project Monitoring and Maintenance Plan* provided as Attachment A to the Final Work Plan Addendum (reprinted as Attachment A to GE's June 5, 2007 *Completion of Installation of Restoration Work Report*) and subsequently specified in the Post-Removal Site Control Plan included in the *Final Completion Report for the Newell Street Area II Removal Action* (Final Completion Report).

Based on observations made during the June and September 2007 inspections, herbaceous planting areas within the NRR/E area were determined to be exhibiting less than the required 100% cover. In response to these observations, GE conducted additional investigations and supplemental restoration activities, including an application of fertilizer in the fall of 2007 and the reinstallation of topsoil and re-seeding with a Trustee-proposed seed mix in June 2008.

During the following inspection in July 2008, the Trustees determined that the installation of the NRR/E measures at Newell Street Area II had been completed in accordance with the applicable CD requirements and Performance Standards. The Trustees issued a Certification of Completion of Installation of Restoration Work to GE on September 2, 2008.

Given the re-seeding of this area in 2008, it was agreed that, following the initial inspection in 2008, the monitoring schedule would include two visits in 2009, 2010, and 2011, one in 2013, and one in 2015. GE conducted monitoring visits in June and July 2009, and June 2010 and submitted reports on those inspections to the Trustees on July 1 and August 26, 2009, and July 8, 2010, respectively. The remainder of this letter describes the results of the August 2010 inspection.

Summary of Inspection Activities

The August 2010 inspection was conducted in accordance with Attachment I to the SOW and the Post-Removal Site Control requirements specified in the Final Completion Report, which was submitted to EPA on October 23, 2009 and approved by EPA on November 23, 2009. Inspection activities consisted of a field inspection and survey of the NRR/E area to: (a) verify areal coverage by herbaceous species; (b) determine any instances of trespassing or herbivory; (c) assess the apparent vigor of the vegetation; (d) inspect for the presence of invasive species; and (e) assess the condition of the bluebird box. Representatives of EPA and the Trustees were present at this inspection.

To document the results of the August 2010 inspection, GE completed an NRR/E Inspection Checklist and collected photographic documentation of the conditions of the NRR/E area. Copies of the completed checklist and the photographs are provided as attachments.

Summary of Observations During Inspection

Under Attachment I to the SOW, the percent coverage Performance Standard for the NRR/E area is 100%. The Post-Removal Site Control requirements specify that any herbaceous planting area within the NRR/E area with less than 100% cover will be evaluated with Trustee input, and that supplemental activities, such as additional fertilizing or watering and/or measures to reduce herbivory, will be implemented as needed. As noted in the attached Inspection Checklist, the August 2010 inspection indicated that the NRR/E area exhibited approximately 100% herbaceous groundcover.

Further, during that inspection, no significant signs of herbivory or stress were observed in the developing plant communities. Several Autumn and/or Russian olive seedlings (which are invasive species) had been observed within the eastern portion of the NRR/E planting area during the June 2009 inspection. The treatment program appeared to be effective on the treated specimens however more Autumn and/or Russian olive seedlings were observed during the August inspection. The total percentage of area occupied by this species was less than 1%, which is well below the 5% Performance Standard for invasive species cover set forth in Attachment I to the SOW and the Post-Removal Site Control Plan.

In addition, the NRR/E area is surrounded by a locked chain-link fence (except along the river) restricting trespasser access, and no signs of damage from trespassers were observed. Finally, the bluebird box was found to be present, intact, and in good condition.

Schedule of Future Activities and Inspections

Due to the presence of more Autumn and/or Russian olive seedlings, GE will continue the treatment program consisting of periodic applications in an effort to control these species.

In accordance with the Post-Removal Site Control Plan in the approved Final Completion Report, two site visits will be performed during each of the first three years after the 2008 replanting (one in May or June and one in July or August), one visit during the fifth year after that replanting (in July/August), and one visit during the seventh year after that replanting (in July/August). The June 2 and July 28, 2009 inspections constituted the required inspections for the first year after the replanting of the NRR/E areas in June 2008, and the June 8 and August 25, 2010 inspections constituted the two required inspections for the second year. GE will conduct two monitoring visits in 2011, one visit in 2013, and one visit in 2015. The required three-year monitoring period for the bluebird box, and extension of the monitoring period based on replacement and relocation of the bluebird box, was completed during the August 2010 inspection.

These inspections, as well as any necessary maintenance, will be performed in accordance with the NRR/E inspection/maintenance requirements set out in Attachment I to the SOW, as noted in the Final Completion Report, and will utilize the NRR/E Inspection Checklist included in Appendix S of that report. Following each inspection, an inspection report will be prepared and submitted to the Trustees' representative in the Massachusetts Department of Environmental Protection, with copies to EPA, within 90 days of each inspection. In addition, GE will prevent shrub and tree growth within the NRR/E area at the Newell Street Area II through mowing of the grass in that area in September or October, as well as through removal of shrub/tree growth, where necessary, in the engineered barrier portion of the NRR/E area.

Please call me if you have any comments or questions.

Sincerely,

Richard W. Gates/EGB

Richard W. Gates
Remediation Project Manager

Attachments

cc: Dean Tagliaferro, EPA
Richard Fisher, EPA
Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston (2 copies)
Michael Gorski, MDEP*
Eva Tor, MDEP*
John Ziegler, MDEP (2 copies)
Todd Chadwell, Stantec
Mayor James Ruberto, City of Pittsfield
Nancy E. Harper, MA AG*
Michael Carroll, GE*
Rod McLaren, GE
James Nuss, ARCADIS
James Bieke, Goodwin Procter
Public Information Repositories
GE Internal Repositories

* *without attachments*

**NATURAL RESOURCE RESTORATION / ENHANCEMENT
INSPECTION CHECKLIST**

NEWELL STREET AREA II REMOVAL ACTION

PARCEL J9-23-12 (PARKING LOT AREA AND PORTION OF WOODED AREA)

I. GENERAL INFORMATION

Inspection Date: 08/25/10
Conducted By/Phone Number: Paolo Filippetti - (585) 385-0090 ext.35
Weather Conditions: Partly Cloudy 68°F
Date of Last Inspection: 06/08/10

II. INSPECTION SUMMARY

1. Groundcover

A. Estimated Groundcover *(Note percentage of groundcover by herbaceous species; note evidence of areas of bare/sparse vegetation; note any damage from trespassing or herbivory; note any physical changes since last inspection, etc.)*

- Eastern and western portions of Newell Street parking lot area - approximately 100% groundcover.

B. Presence of Invasive Species *(Note percentage of area occupied by invasive species; note the species present including the following: Amur honeysuckle, Autumn olive, Black locust, Black swallow-wort, Coltsfoot, Common barberry, Common buckthorn, Cyprus spurge, Garlic mustard, Glossy buckthorn, Goutweed or Bishop's weed, Japanese barberry, Japanese honeysuckle, Japanese knotweed, Morrow's honeysuckle, Morrow's X Tartarian honeysuckle [hybrid], Multiflora rose, Norway maple, Oriental bittersweet, Phragmites - Reed grass, Porcelain berry, Purple loosestrife, Russian olive, Spotted knapweed, Tartarian honeysuckle, Yellow iris, or any other plant species listed by the Massachusetts Invasive Plant Advisory Group as "Invasive," "Likely Invasive," or "Potentially Invasive.")*

- Autumn and/or Russian olive seedling were observed in the eastern portion of the NRR/E planting area. Total percentage of area occupied by these species was observed to be less than 1%.

2. Bluebird box *(note any evidence of damage and the extent of damage such as the need to be replaced)*

- Bluebird box observed to be in good condition.

3. Other Observations *(Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations, including area-specific restoration activities.)*

- Implemented a treatment program to control Autumn and/or Russian olive seedlings that had been observed in the eastern portion of the NRR/E planting area in June 2010. The treatment program appeared to be effective on the treated specimens however, as mentioned above, more Autumn and/or Russian olive seedlings were observed during the August inspection.

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Continue treatment program to control Autumn and/or Russian olive seedlings.
- Mow NRR/E area in September/October 2010.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE



Photo #1: Herbaceous cover within the NRR/E area at Newell Street Area II (looking north).



Photo #2: Herbaceous cover within the NRR/E area at Newell Street Area II (looking east).

Client: General Electric Company
Project Name: Newell Street Area II
Project Location: Pittsfield, Massachusetts

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Photo #3: Herbaceous cover within the NRR/E area at Newell Street Area II (looking south).

Client: General Electric Company

Project Name: Newell Street Area II

Project Location: Pittsfield, Massachusetts

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Photo #4: Area where Autumn and/or Russian olive seedlings were treated within the NRR/E area at Newell Street Area II.



Photo #5: One of the treated Autumn or Russian olive seedlings within the NRR/E area at Newell Street Area II.

Client: General Electric Company

Project Name: Newell Street Area II

Project Location: Pittsfield, Massachusetts

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Photo #6: Bluebird box within the NRR/E area at Newell Street Area II.

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Project Name: Newell Street Area II
Project Location: Pittsfield, Massachusetts

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