



GE Corporate

159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

June 11, 2015

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

**Re: 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 2015 Tree Cage Inspections at the Group 4C Floodplain Properties**

Dear Mr. Tagliaferro:

On May 13, 2015, the General Electric Company (GE) performed an inspection of tree cages (where present) at the Phase 4 properties located within the floodplain adjacent to the 1½ Mile Reach of the Housatonic River. As depicted on Figure 1, the Phase 4 properties within the floodplain adjacent to the 1½ Mile Reach are divided into three groups (Groups 4A, 4B, and 4C). All required inspections at the properties in Groups 4A and 4B were previously completed. Group 4C consists of two residential properties (Parcels I6-1-102 and I6-1-105) and four non-residential properties (Parcels I6-1-62, I6-1-103, I6-1-104, and I6-1-106). The final regular inspection of these properties was performed in August 2012, with the report on that inspection submitted to EPA on September 11, 2012.

In a November 28, 2012 conditional approval letter for the September 11, 2012 inspection report, EPA directed GE to continue to inspect the Group 4C properties annually through 2015 to determine if any tree cages (where present) are adversely affecting tree growth and, if so, to remove those cages. The last inspection of the tree cages at these properties prior to May 2015 was performed in May 2014, with the report on it dated June 13, 2014. Figure 2 contains the restoration planting plan for the Group 4C properties as shown in the relevant Final Completion Reports.

The May 2015 inspection of the tree cages at the Group 4C properties indicated that cages remained around the great majority (approximately 99%) of the replanted trees on these properties. Observations during the inspection indicated that all of those cages were in good condition. However, one tree cage on Parcel I6-1-104 was restricting the growth of the associated tree (a cottonwood) and was removed at the time of the inspection. In addition, observations during the May 2015 inspection indicated that numerous volunteer saplings (i.e., plantings that were not installed as part of the restoration planting plan) within the Group 4C properties had been cut and removed by beavers.

EPA's November 28, 2012 letter directed that, after the 2015 tree cage inspection, GE would provide a proposal to EPA for addressing the tree cages in subsequent years. As noted above, the tree cages remaining at the Group 4C properties are in good condition. Considering the recent beaver activity at these properties, GE proposes to maintain the tree cages (where present) for one additional year and then to remove them in the spring of 2016. In addition, we note that the backfilled/restored areas at the Group 4C properties will be inspected after severe storms (defined as events causing a peak flow on the Housatonic River exceeding 3,500 cfs at the U.S. Geological Survey gaging station at Coltsville) to ensure that they have not sustained significant damage.

Please call me if you have any comments or questions.

Sincerely

Richard W. Gates / SME

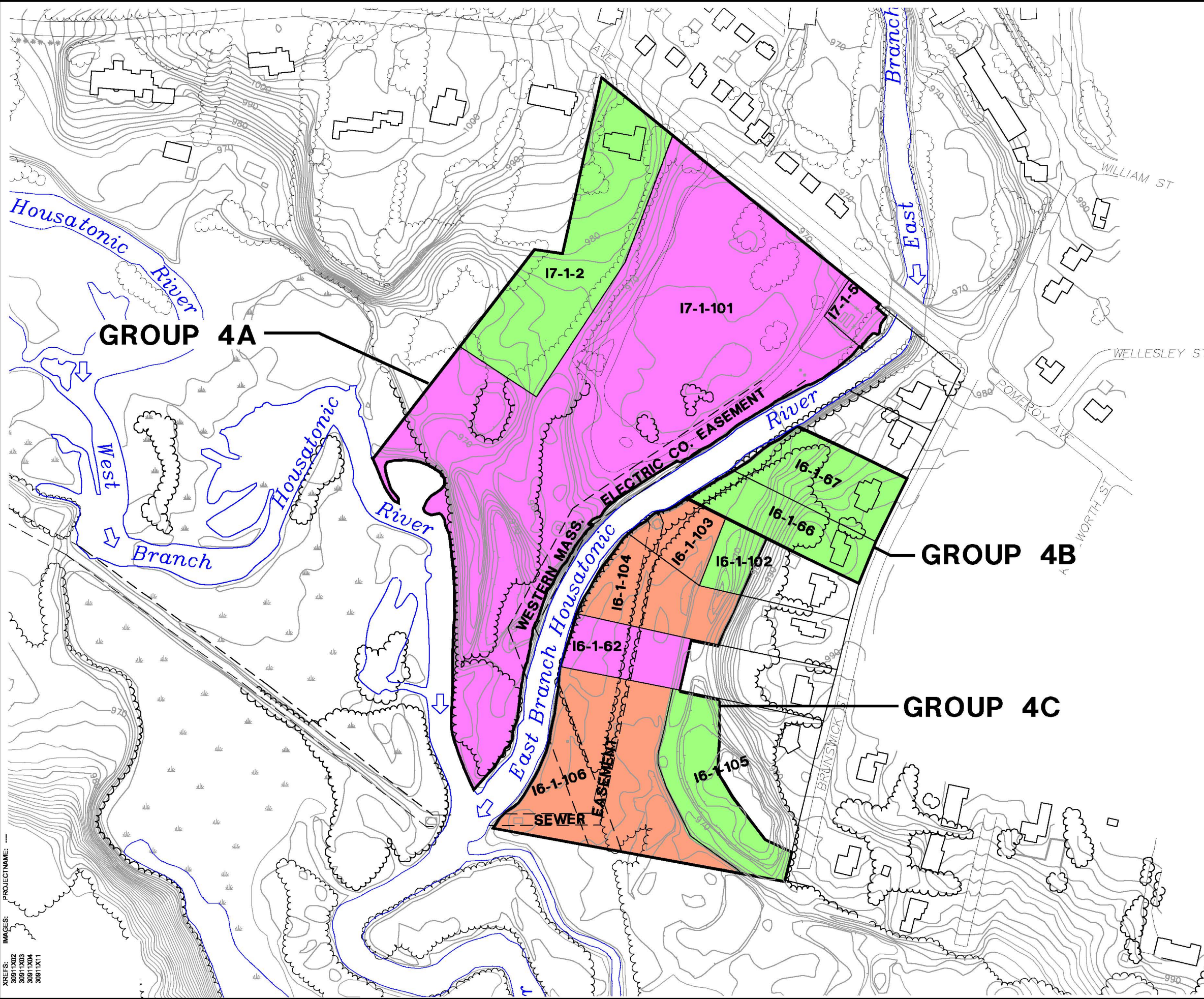
Richard W. Gates
Senior Project Manager – Environmental Remediation

Attachments

cc: John Kilborn, EPA*
Christopher Ferry, ASRC Primus (electronic copy)
Robert Leitch, USACE
Michael Gorski, MassDEP (electronic copy)
Eva Tor, MassDEP (electronic copy of cover letter)*
John Ziegler, MDEP (electronic copy)
Nancy E. Harper, MA AG*
Karen Pelto, Mass DEP*
Nate Joyner, City of Pittsfield (electronic copy)
Scott Campbell, Avatar (2 copies + electronic copy)
Rod McLaren, GE*
James Nuss, ARCADIS
James Bieke, Sidley Austin
Property Owner – Parcel I6-1-62
Property Owner – Parcel I6-1-102
Property Owner – Parcel I6-1-103
Property Owner – Parcel I6-1-104
Property Owner – Parcel I6-1-106
Public Information Repositories
GE Internal Repository

** cover letter only*

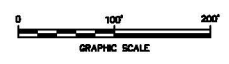
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LEGEND

- PROPERTY BOUNDARY
- 17-1-2** PROPERTY ID
- VEGETATION
- ELEVATION CONTOUR
- EDGE OF WATER
- PAVED ROADWAY
- UNPAVED ROADWAY OR TRAIL
- RESIDENTIAL PROPERTY - ACTUAL/POTENTIAL LAWN AREA (AS DEFINED IN SOW)
- NON-GE-OWNED RECREATIONAL PROPERTY - NON-BANK AREA
- GE-OWNED RECREATIONAL PROPERTY - NON-BANK AREA

- NOTES:**
- THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
 - PARCEL IDENTIFICATION AND BOUNDARIES ARE BASED ON CITY OF PITTSFIELD TAX ASSESSORS' INFORMATION.

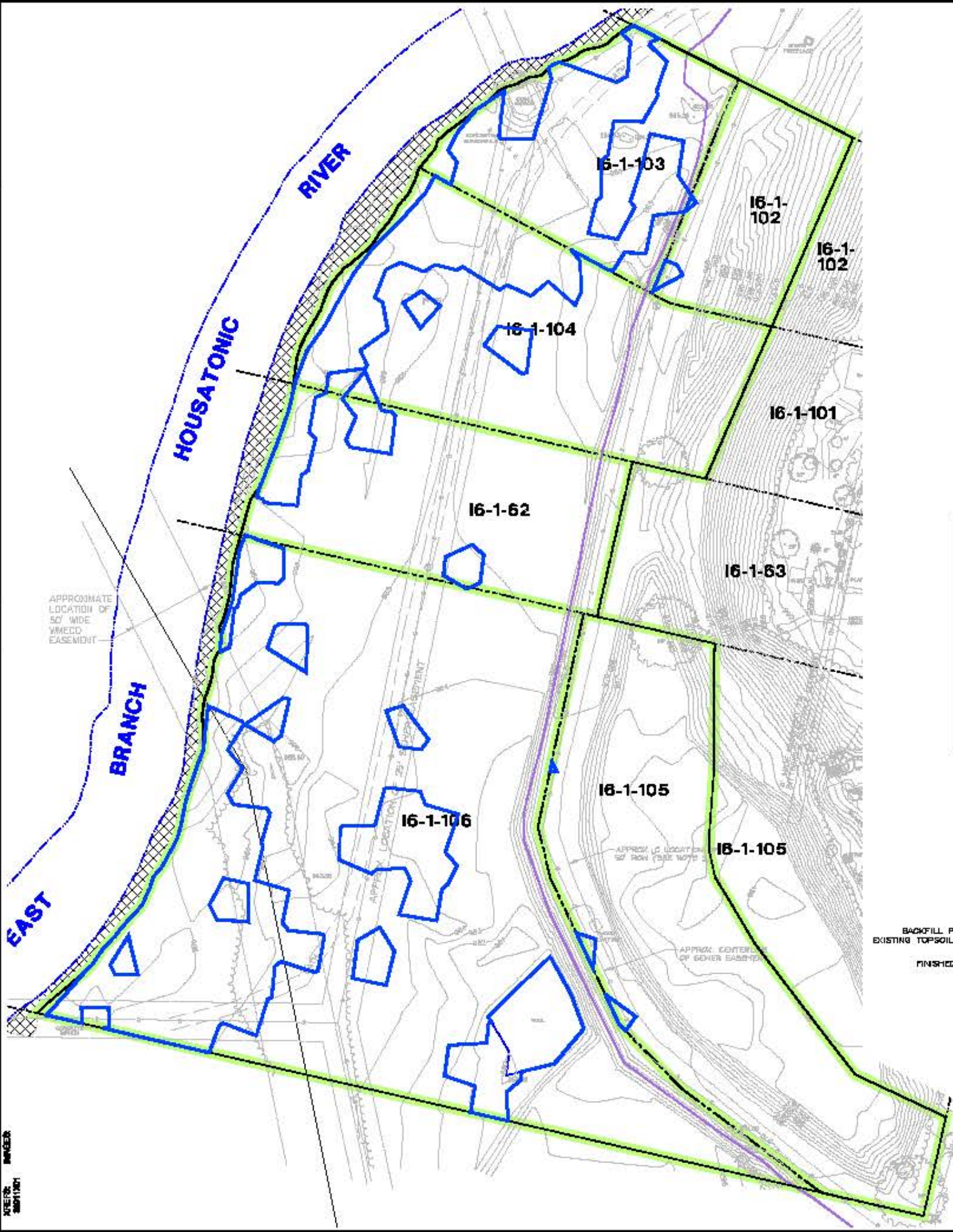


GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
PHASE 4 FLOODPLAIN PROPERTIES ADJACENT TO THE 1 1/2 MILE REACH OF THE HOUSATONIC RIVER

SITE PLAN



CITY OF PITTSFIELD, MASSACHUSETTS
 PROJECT: RESTORATION PLANTING PLAN FOR PHASE 4 - GROUP 4C
 DRAWING NO: 16-1-101
 DATE: 10/15/2008
 DRAWN BY: J. BROWN
 CHECKED BY: J. BROWN
 APPROVED BY: J. BROWN

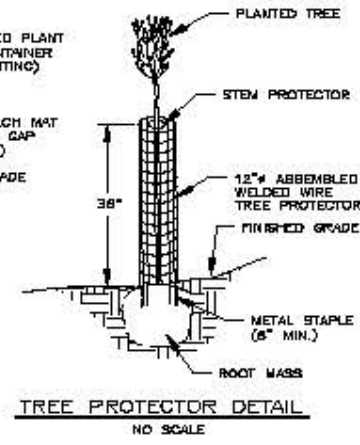
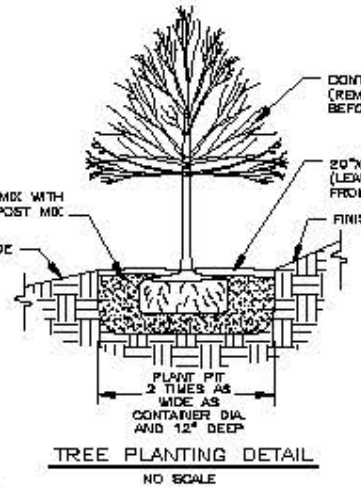


ORIGINALLY PLANTED TREES	
Species	Total Planted
Upland Area	
Silver Maple (Acer saccharinum)	255
Red Maple (Acer rubrum)	
Sugar Maple (Acer saccharum)	
Eastern Cottonwood (Populus deltoides)	187
Box Elder (Acer negundo)	181
Northern Arrowwood (Viburnum dentatum)	8
Winterberry Holly (Ilex verticillata)	5
Dogwood (Cornus sericea)	10
Chokecherry (Prunus virginiana)	4
Total	558

Note: 3 of the maples planted within the Phase 4C properties are on residential Parcel 16-1-102. The remaining maples were planted on non-residential parcels.

REPLANTED TREES			
Species	Installation Date	Quantity	Height (ft.) of Time of Replanting
Northern Arrowwood (Viburnum dentatum)	October 2008	5	3'
Dogwood (Cornus sericea)	October 2008	3	3'
Chokecherry (Prunus virginiana)	October 2008	1	2'
	May 2010	1	2'
Eastern Cottonwood * (Populus deltoides)	May 2010	79	16'
Red Maple (Acer rubrum) *	May 2010	80	12'

Note: * DENOTES SUBSTITUTE SPECIES (PROPOSED BY GE AND APPROVED BY EPA) TO BE PLANTED IN UEL OF BOX ELDERS.



LEGEND

- BOUNDARY OF FLOODPLAIN PROPERTIES AS DESIGNATED IN SDW
- - - - - APPROXIMATE PARCEL BOUNDARY
- 16-1-62 APPROXIMATE HORIZONTAL LIMITS OF AVERAGING AREA
- 16-1-62 PROPERTY PARCEL ID
- 10 YEAR FLOODPLAIN
- WIRE FENCE
- CHAIN LINK FENCE
- WOODEN FENCE
- STONE WALL/RETAINING WALL
- WATER LINE
- GAS LINE
- SANITARY SEWER
- OVERHEAD ELECTRIC
- 0'70' ELEVATION CONTOUR (1 FOOT CONTOUR INTERVAL)
- EDGE OF BUSHES/HEDGE
- SHRUB
- CONIFEROUS TREE
- DECIDUOUS TREE
- LIGHT POLE
- UTILITY POLE
- SANITARY MANHOLE
- HYDRANT
- EASEMENT LINE
- APPROXIMATE EDGE OF WATER
- AREA ASSOCIATED WITH EPA'S 1 1/2 MILE REACH REMOVAL ACTION
- LIMITS OF SOIL REMOVAL

- NOTES:**
- THE BASE MAP FEATURES (EXCLUDING THE RIVERS) PRESENTED ON THIS FIGURE ARE FROM SURVEY BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, FILE NO. GE1100-001, DATED 8/7/06. RIVER LOCATIONS WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1980 AERIAL PHOTOGRAPHS. RIVER LOCATIONS ARE APPROXIMATE.
 - THE 10 YEAR FLOODPLAIN LINE IS APPROXIMATE AND WAS DERIVED USING HYDRAULIC MODELING PERFORMED BY BLASLAND, BOUCK & LEE, INC. (1994) AND AVAILABLE TOPOGRAPHIC MAPPING.
 - UTILITIES ARE SHOWN IN AN APPROXIMATED WAY ONLY AND ALL UTILITIES MAY NOT BE SHOWN.
 - THE PARCELS SHOWN HEREON MAY BE SUBJECT TO RIGHTS AND EASEMENTS AS CONTAINED IN THE VARIOUS DEEDS OF RECORD DESCRIBING SAID PREMISES. ALL RIGHTS AND EASEMENTS MAY NOT BE DEPICTED HEREON.
 - LIMIT OF EPA RESPONSE ACTIONS ASSOCIATED WITH THE 1 1/2 MILE REACH IS BASED ON ELECTRONIC FILE RECEIVED FROM EPA ON JUNE 14, 2006.



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
PHASE 4 FLOODPLAIN PROPERTIES ADJACENT TO THE 1 1/2 MILE REACH OF THE HOUSATONIC RIVER

RESTORATION PLANTING PLAN FOR PHASE 4 - GROUP 4C

