



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted via Overnight Courier*

October 20, 2009

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

**Re: GE-Pittsfield/Housatonic River Site  
East Street Area 2-South (GEC150)  
Summary of August/September 2009 Inspection Activities – City Recreational Area**

Dear Mr. Fisher:

On August 28 and September 21, 2009, the General Electric Company (GE) performed the annual post-remediation inspection of the City Recreational Area located within a portion of the East Street Area 2-South Removal Action Area at the GE Plant in Pittsfield, Massachusetts. The City Recreational Area, which is currently leased to the City of Pittsfield for its use as a multi-functional recreational area, consists of two sub-areas – the Ballfield Area and the Access Road Area. Soil remediation activities, construction of the athletic fields and ancillary facilities, and site restoration activities within the City Recreational Area were completed by GE in June 2004 in accordance with GE's *Removal Design/Removal Action Work Plan for the Future City Recreational Area* (December 2001) and an addendum to that work plan dated April 2003. Previous post-remediation inspections were performed in November 2005, November 2006, October 2007, and September 2008; and reports on those inspections were submitted to EPA.

The August/September 2009 inspection was performed in accordance with the Post-Removal Site Control requirements specified in the *Final Completion Report for the City Recreational Area* (Final Completion Report), which was submitted to EPA on July 31, 2008 and approved by EPA on August 27, 2008. This inspection included observations of the soil cover and the perimeter fencing, as shown on Figure 3 of the Final Completion Report, a copy of which is attached hereto.

### **Summary of Inspection Activities**

The August/September 2009 inspection consisted of visual observations of the Ballfield Area and the Access Road Area focusing on the soil cover and the perimeter fencing. Specifically, this inspection included observations of the following:

- Surface cover area to identify any evidence of failure or other significant alteration of the cover, including erosion and uneven settlement relative to surrounding areas;
- Surface cover for evidence of animal burrows, unauthorized excavation, or other conditions that could jeopardize the integrity of the cover;
- Concrete portions of the surface cover in the restroom facility, scorer's booth, and dugouts to assess the overall function and integrity of the cover in those areas;

- Access road/parking area to ensure that nothing (e.g., erosion, unauthorized excavation, etc.) has occurred that would significantly reduce the post-remediation elevations in these areas;
- Any evidence of damage to the geotextile liner installed at the Access Road Area;
- Perimeter fence to identify potential evidence of unauthorized entry or use of the City Recreational Area; and
- Perimeter fence to identify potential evidence of unauthorized access to East Street Area 2-South from the City Recreational Area.

The August/September 2009 inspection also included observations of the specific areas where the need for follow-up activities had been identified during the prior inspection. The results of the August/September 2009 inspection are included in an Inspection Summary and Checklist for the City Recreational Area, using the form included in the Final Completion Report. The completed form for the August/September 2009 inspection is included.

#### **Summary of Observations During Inspection**

The September 2008 inspection at the City Recreational Area identified the following maintenance items: (a) replacing rip-rap in areas with exposed non-woven geotextile fabric behind the scorer's booth; (b) filling and seeding a small hole in the sod adjacent to the outer fence and near the center field of the ballfield; and (c) replacing the damaged lock on the gate at the corner of East Street and Newell Street. Since that time, all of the maintenance items have been completed.

The August/September 2009 inspection indicated that the inspected areas within the City Recreational Area were in good overall condition. No further maintenance or repair activities were identified.

#### **Schedule for Future Inspections**

In accordance with the approved Final Completion Report, the soil cover and perimeter fencing will be inspected annually in August or September (subject to EPA approval of a different frequency), as well as after severe storms. The next such scheduled inspection will be conducted in August or September 2010. Future inspections of the City Recreational Area will be conducted in accordance with the Post-Removal Site Control Plan included in the Final Completion Report. 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 W. Gates / EGB*

Richard W. Gates  
Remediation Project Manager

Attachments

cc: Dean Tagliaferro, EPA  
Tim Conway, EPA\*  
Holly Inglis, EPA  
Rose Howell, EPA\*  
Linda Palmieri, Weston  
Michael Gorski, MDEP  
Susan Steenstrup, MDEP  
John Ziegler, MDEP  
Eva Tor, MDEP\*  
Jane Rothchild, MDEP\*  
Mayor J. Ruberto, City of Pittsfield  
Barbara Landau, Noble & Wickersham  
Teresa Bowers, Gradient  
William Hines, PEDA  
Michael Carroll, GE\*  
Rod McLaren, GE\*  
Peter Wojcik, GE\*  
James Bieke, Goodwin Procter  
James Nuss, ARCADIS  
Public Information Repositories  
GE Internal Repository

*\* cover letter only*

**INSPECTION SUMMARY AND CHECKLIST  
CITY RECREATIONAL AREA**

**I. GENERAL INFORMATION**

Inspection Date: 8/28/09 and 9/21/09  
 Conducted By/Phone Number: Gregg Rabasco (413) 822-1184  
 Weather Conditions: Overcast, 60-70°F / Sunny, 65-75°F  
 Date of Last Inspection: 9/17/08

**II. INSPECTION SUMMARY**

1. Confirm that Figure 3 from the *Final Completion Report for the City Recreational Area* and the as-built survey drawings included in Appendix E of that document have been reviewed.

- Confirmed

2. **Ballfield Area - Surface Cover** (Note any physical changes since last inspection; note any evidence of any of the following: surface cover failure or other significant alterations, erosion, uneven settlement relative to surrounding areas, animal burrows, unauthorized excavation, other conditions that could jeopardize the integrity of the cover, etc.)

- All areas in good condition.

3. **Ballfield Area - Concrete Portions of Surface Cover** (Note any physical changes since last inspection; note any evidence of conditions that would adversely affect the function and integrity of concrete portions of the surface cover in the restroom facility, scorer's booth, and dugouts.)

- All areas in good condition.

4. **Access Road / Parking Area** (Note any physical changes since last inspection; note any evidence of any of the following: surface alterations, erosion/burrows, uneven settlement, exposed geotextile, damage to the geotextile, unauthorized excavation, other conditions that could significantly reduce the post-remediation elevations in these areas, etc.)

- All areas in good condition.

5. **Fencing / Gates / Access Controls** (Note any physical changes since last inspection; note overall condition and integrity, evidence of unauthorized access, etc.)

- All areas in good condition.

6. **Other Observations** (Confirm that repair/maintenance measures identified during prior inspection have been performed; note any other general observations)

- Rip-rap had been replaced in areas of exposed non-woven geotextile fabric in the rip-rap area behind the scorer's booth.
- The small hole adjacent to the outer fence had been filled with topsoil and grass seed.
- A chain and a master lock had been installed to keep the gate at the corner of East Street and Newell Street closed and locked.

**INSPECTION SUMMARY AND CHECKLIST  
CITY RECREATIONAL AREA**

**III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES**



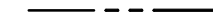






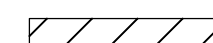
-	None

**ATTACH ADDITIONAL INFORMATION AS APPROPRIATE**

CITY: SYRACUSE DIV/GRP: 141 DB: GMS DMW GMS LD: DMW PM: S. ELLSWORTH LVR: ONL OFF=REF  
 G:\CAD\GE-CAD\N-ACT\B0031017\0000\0000\1\DWG\FINAL\31017G4L.DWG LAYOUT: 3 SAVED: 7/31/2008 10:24 AM ACADVER: 17.0S (LMS TECH) PAGES: 17 PLOTTED: 10/16/2008 3:34 PM BY: BASSETT, RICHARD  
 XREFS: 31017X00 PROJECTNAME: ---



**LEGEND:**

-  APPROXIMATE LIMITS OF SURFACE COVER
-  APPROXIMATE LIMITS OF ACCESS ROAD AREA
-  PROPERTY LINE
-  LIGHT POST
-  GATE
-  CHAIN LINK FENCE
-  BUILDING/STRUCTURE
-  UNPAVED (GRASS/DIRT/GRAVEL)
-  PAVED (ASPHALT)
-  ACCESS ROAD/PARKING AREA

**NOTES:**

1. MAPPING IS BASED ON SURVEY PROVIDED BY WHITE ENGINEERING, INC. DATED 12/4/01.
2. THE LOCATIONS OF SITE FEATURES (INCLUDING THE SCORER'S BOOTH, DUGOUTS, RESTROOM FACILITY, FENCING, GATES, LIGHT POSTS, AND WALKING TRACK) ARE BASED ON SURVEY PROVIDED BY FORESIGHT LAND SERVICES (PERFORMED BETWEEN JULY 29, 2004 AND SEPTEMBER 6, 2006).



GENERAL ELECTRIC COMPANY  
 PITTSFIELD, MASSACHUSETTS  
**FINAL COMPLETION REPORT FOR THE  
 CITY RECREATIONAL AREA**

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**AREAS/ITEMS SUBJECT TO  
 INSPECTION**

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 **ARCADIS**

FIGURE  
**3**