



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

August 7, 2009

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

**Re: GE-Pittsfield/Housatonic River Site
Newell Street Area II (GEC450)
Summary of July 2009 Inspection Activities at the Vermont/Ontario Street Area**

Dear Mr. Fisher:

On July 10, 2009, the General Electric Company (GE) performed the initial post-remediation inspection of the remediated area within undeveloped Vermont and Ontario Streets between the wooded area on Parcel J9-23-12 and the adjacent properties outside Newell Street Area II (the Vermont/Ontario Street Area, shown on Figure 1). GE conducted remediation activities at the Vermont/Ontario Street Area in accordance with GE's *Second Addendum to Final Removal Design/Removal Action Work Plan* (dated October 16, 2008) and *Third Addendum to Final Removal Design/Removal Action Work Plan* (dated April 14, 2009), as conditionally approved by the U.S. Environmental Protection Agency (EPA) on January 20, 2009 and April 21, 2009, respectively. These remediation activities were performed in June 2009.

Previous post-remediation inspections of the remediated properties at Newell Street Area II were performed in November 2006, May and October 2007, May and September 2008, and May 2009; and reports on those inspections were subsequently submitted to EPA. The July 2009 inspection of the Vermont/Ontario Street Area was conducted in accordance with requirements set forth in the Post-Removal Site Control Plan for Newell Street Area II, set forth in Section 8.3 of the March 2005 Final RD/RA Work Plan, as modified and supplemented with a number of activities based on agreements between GE and EPA relating to a draft Final Completion Report (FCR) for the Newell Street Area II Removal Action.

The July 2009 inspection included visual observations of the backfilled and restored areas at the Vermont/Ontario Street Area, focusing on the following: (a) the effectiveness of erosion controls in areas where vegetation is not yet established; (b) any areas where excessive settlement has occurred relative to the surrounding areas; (c) any drainage or growth problems; (d) areas susceptible to erosion as a result of the remediation activities; and (e) other conditions that could jeopardize the performance of the completed remediation actions. The results of the July 2009 inspection are provided in an Inspection Summary and Checklist. The form used in this inspection is that which was developed for inclusion in the draft FCR for Newell Street Area II (with minor modifications to reflect that the FCR has not been finalized). The completed inspection form is attached.

As indicated on that form, the July 2009 inspection showed that the backfilled and restored areas at the Vermont/Ontario Street Area were in good condition.

The backfilled/restored areas at the Vermont/Ontario Street Area will be inspected again in May and August or September 2010 and on an annual basis thereafter (in August or September) unless and until EPA approves an alternate frequency, as well as after severe storms. GE will inspect the grass/herbaceous cover at the Vermont/Ontario Street Area in August or September 2009, May and August or September 2010, and May 2011, in conjunction with other inspections at Newell Street Area II, to complete the required two-year monitoring period for this vegetative cover.

Future inspections will utilize the Inspection Summary and Checklist form included in the EPA-approved final FCR or, prior to approval of the FCR, the form included herein. Within 30 days 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*
K.C. Mitkevicius, USACE
Michael Gorski, MDEP
Susan Steenstrup, MDEP (2 copies)
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John Ziegler, MDEP*
Jane Rothchild, MDEP*
Linda Palmieri, Weston (2 copies)
Nancy E. Harper, MA AG*

Dale Young, MA EOEEA
Mayor James Ruberto, City of Pittsfield
Pittsfield Department of Health
Barbara Landau, Noble & Wickersham
Michael Carroll, GE*
Roderic McLaren, GE*
Peter Wojcik, GE*
James Nuss, ARCADIS
James Bieke, Goodwin Procter
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GE Internal Repository

**cover letter only*

INSPECTION SUMMARY AND CHECKLIST
NEWELL STREET AREA II REMOVAL ACTION
Vermont/Ontario Street

I. GENERAL INFORMATION

Inspection Date: 7/10/2009
 Conducted By/Phone Number: Bobby Papallo (ARCADIS) / 413-281-0704 and Joanne Flescher (MDEP)
 Weather Conditions: Sunny, 74°F
 Date of Last Inspection: NA

II. INSPECTION SUMMARY

1. Confirm that Figure 3 of the draft *Final Completion Report for the Newell Street Area II Removal Action* (Final Completion Report) and the as-built survey drawings and engineered barrier plan included in Appendix E of that document have been reviewed.

- Confirmed

2. **Engineered Barriers** - Check applicable barrier types for this parcel and complete inspection for each:

- Vegetative**
- Asphalt-Covered**

A. Vegetative Engineered Barriers (Note any physical changes since last inspection; note evidence of any of the following: topsoil erosion; bare or sparsely vegetated areas; deficiencies in the soil layer overlaying the synthetic cover components [e.g., excessive erosion, surface water ponding, depressions, exposed synthetic cover components, vehicle ruts, or other abnormalities]; damage to synthetic cover components; uneven settlement relative to surrounding areas; the proper functioning of any associated surface water diversions; the condition of fencing; animal burrows; unauthorized excavation; etc.)

- NA

B. Asphalt-Covered Engineered Barriers (Note any physical changes since last inspection; note evidence of any of the following: excessive cracking, fissures, spalling, or potholes; depressions and/or surface water ponding, excessive rutting, or exposed subbase materials; the condition of perimeter drainage system discharge locations [e.g., evidence of blockage], etc.)

- NA

3. **Other Backfilled/Restored Areas** (Note any physical changes since last inspection; note evidence of any of the following: excessive settlement, soil erosion, drainage problems, burrows, vehicle ruts, excessive cracking or potholes in the paved surface of the access road, unauthorized excavations, unauthorized uses of areas, etc.)

- All areas in good condition.

4. **Vegetation Areas** (Note any physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of stressed/sparse cover], other landscaping items [trees, shrubs, etc.] planted during restoration activities, tree guards, tree cages, and tree stakes; review the latest Restoration Planting Plan and determine the percent survivorship of planted trees and shrubs; and measure and record the size of all trees and shrubs subject to inspection.)

- NA - Subject to inspection in August or September 2009

INSPECTION SUMMARY AND CHECKLIST
NEWELL STREET AREA II REMOVAL ACTION
Vermont/Ontario Street

II. INSPECTION SUMMARY (continued)

5. Areas Potentially Susceptible to Erosion *(Inspect any other areas that are potentially subject to erosion as a result of the remediation, including drainage outlets, drainage swales, and edges of pavement located within the limits of the soil removal areas, and note evidence of any erosion. Include, where relevant, an inspection of the drainage swale running along the City of Pittsfield property onto Parcel J9-23-8 and associated drainage outlet on Parcel J9-23-8; the barrier drainage pipe originating on Parcel J9-23-8 that discharges adjacent to the westernmost drainage swale on Parcel J9-23-12; the drainage swale between Parcels J9-23-8 and J9-23-12 and associated drainage outlet on Parcel J9-23-12; the drainage swale and three drainage outlets on Parcel J9-23-12; and the edges of paved areas [i.e., the access road] on Parcels J9-23-8 and J9-23-12; verify the integrity of these structures and evaluate whether drainage through or discharges from these outlets are causing erosion; verify that there has been no significant movement of riprap or reduction in riprap thickness that threatens the stability of the riprapped swale or drainage outlets, or results in the erosion of underlying soils or sediment or in the exposure of underlying geotextile fabric [unless such fabric overlays concrete].)*

- NA

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

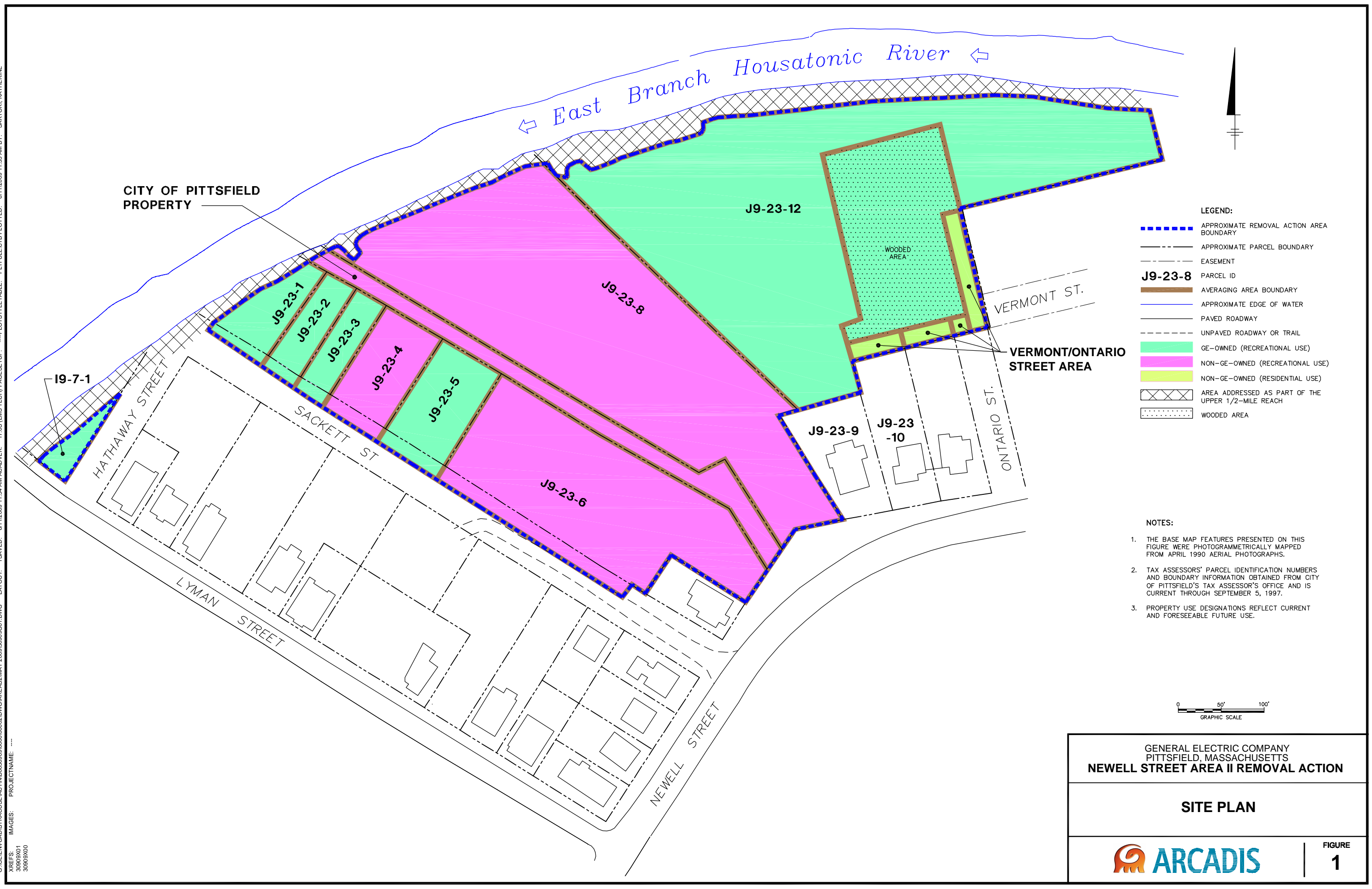
- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- None

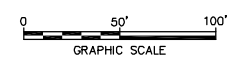
ATTACH ADDITIONAL INFORMATION AS APPROPRIATE

CITY:SYRACUSE DIV:GROUP:ENY/41 DBID:WODARCZYK R. BASSETT D. WODARCZYK LD.D. WODARCZYK PIC: P. KEANEY PM: E. BREMER TM: S. ELLSWORTH LVR: ONL-OFF-REF FRZN
 G:\GEN\EN\CAD\SYRACUSE\ACT\N0309090000\00002\DWG\AREAS\MAY 2009\30909001.DWG LAYOUT: 1\$AVED: 6/11/2009 11:54 AM ACADVER: 17.0S (LMS TECH) PAGESETUP: ---PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 6/11/2009 11:55 AM BY: SARTORI, KATHERINE
 XREFS: 30909X01 30909X00
 IMAGES: PROJECTNAME: ---



- LEGEND:**
- - - - - APPROXIMATE REMOVAL ACTION AREA BOUNDARY
 - - - - - APPROXIMATE PARCEL BOUNDARY
 - - - - - EASEMENT
 - J9-23-8** PARCEL ID
 - AVERAGING AREA BOUNDARY
 - APPROXIMATE EDGE OF WATER
 - PAVED ROADWAY
 - UNPAVED ROADWAY OR TRAIL
 - GE-OWNED (RECREATIONAL USE)
 - NON-GE-OWNED (RECREATIONAL USE)
 - NON-GE-OWNED (RESIDENTIAL USE)
 - AREA ADDRESSED AS PART OF THE UPPER 1/2-MILE REACH
 - WOODED AREA

- NOTES:**
1. THE BASE MAP FEATURES PRESENTED ON THIS FIGURE WERE PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
 2. TAX ASSESSORS' PARCEL IDENTIFICATION NUMBERS AND BOUNDARY INFORMATION OBTAINED FROM CITY OF PITTSFIELD'S TAX ASSESSOR'S OFFICE AND IS CURRENT THROUGH SEPTEMBER 5, 1997.
 3. PROPERTY USE DESIGNATIONS REFLECT CURRENT AND FORESEEABLE FUTURE USE.



GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
NEWELL STREET AREA II REMOVAL ACTION

SITE PLAN

FIGURE
1