



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

October 12, 2010

Mr. Richard Fisher (Mail Code OSRR07-1)
United States Environmental Protection Agency
5 Post Office Square – Suite 100
Boston, MA 02109-3912

**Re: GE-Pittsfield/Housatonic River Site
East Street Area 2-South (GEC150)
Summary of September 2010 Inspection Activities – City Recreational Area**

Dear Mr. Fisher:

On September 14, 2010, 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 annually at this property since November 2005. Summaries of these inspections were presented in prior letters to EPA. The most recent prior inspection was performed in August/September 2009, with the report on it dated October 20, 2009.

The September 2010 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 September 2010 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 results of the September 2010 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 September 2010 inspection is included.

Summary of Observations During Inspection

The September 2010 inspection indicated that the inspected areas within the City Recreational Area were in good overall condition with the exception of the pedestrian gate in the northwest corner. The gate was broken open, allowing unauthorized access to the GE facility from the City Recreational Area. Subsequent to the inspection, a chain was purchased and installed with a lock to prevent unauthorized access to the GE facility. 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 2011. 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 *REG*

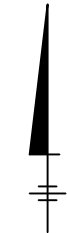
Richard W. Gates
Remediation Project Manager

Attachments



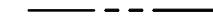






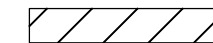
cc: Dean Tagliaferro, EPA
Tim Conway, EPA*
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston
Michael Gorski, MDEP*
John Ziegler, MDEP (2 copies)
Eva Tor, MDEP*
Mayor J. Ruberto, City of Pittsfield
Barbara Landau, Noble & Wickersham
Teresa Bowers, Gradient
William Hines, PEDAs
Michael Carroll, GE*
Rod McLaren, GE*
Peter Wojcik, GE*
James Bieke, Goodwin Procter
James Nuss, ARCADIS
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GE Internal Repository

** cover letter only*

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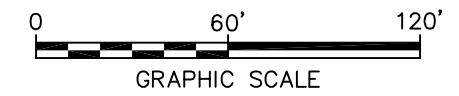


LEGEND:

-  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**

**AREAS/ITEMS SUBJECT TO
 INSPECTION**


 **ARCADIS**

FIGURE
3

**INSPECTION SUMMARY AND CHECKLIST
CITY RECREATIONAL AREA**

I. GENERAL INFORMATION

Inspection Date: 9/14/2010
Conducted By/Phone Number: Gregg Rabasco (413) 822-1184
Weather Conditions: Cloudy, 60-65° F
Date of Last Inspection: 8/28/2009 and 9/21/2009

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.)

- Pedestrian gate at the northwest corner of the site was broken open, allowing pedestrians to access the GE facility. Subsequent to the inspection, a new chain was purchased and installed with a GE lock to stop unauthorized access to the GE facility.

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

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- None

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE