



GE
159 Plastics Avenue
Pittsfield, MA 01201
USA

Transmitted via Overnight Courier

October 26, 2011

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
Hill 78 Area-Remainder (GEC160)
Summary of September 2011 Inspection Activities**

Dear Mr. Fisher:

On September 27, 2011, the General Electric Company (GE) performed the sixth post-remediation inspection of the Hill 78 Area-Remainder Removal Action Area (RAA). In accordance with GE's approved *Final Removal Design/Removal Action Work Plan for Hill 78 Area-Remainder* (Final RD/RA Work Plan), GE conducted remediation activities at this RAA in November and December 2008. Restoration activities were completed in May 2009. Previous post-remediation inspections were performed semi-annually since June 2009 at Hill 78 Area-Remainder. Summaries of these inspections were presented in prior letters to EPA. The last full inspection was performed in September 2010, with a report on it dated October 19, 2010; and an additional inspection of the restored herbaceous vegetation was performed in May 2011, with the report on it dated June 14, 2011. This letter documents the results of the September 2011 inspection activities at Hill 78 Area-Remainder.

The September 2011 inspection was conducted in accordance with the Post-Removal Site Control requirements specified in the *Final Completion Report for the Hill 78 Area-Remainder Removal Action* (Final Completion Report), which was submitted to EPA on August 30, 2011 and approved by EPA on September 6, 2011. This inspection included observations of the backfilled/restored areas, certain drainage features, and existing structures that are part of the Other Ground-Covering Feature Area under the Grant of Environmental Restriction and Easement (ERE) for this RAA, as shown on Figure 4 from the Final Completion Report (a copy of which is attached to this letter). It also included observations of the restored herbaceous vegetation that was planted as part of restoration activities. Further, in accordance with the requirements of the Final Completion Report, the inspection included an evaluation of whether a severe tropical storm event that occurred in the area on August 28, 2011, causing flows on the Housatonic River to exceed a 15-minute peak flow of 3,500 cubic feet per second (cfs) at the United States Geological Survey (USGS) gaging station at Coltsville, Massachusetts, had caused any damage to the areas subject to inspection.

Summary of Inspection Activities

During the September 2011 inspection, the observations of the backfilled/restored areas (including the restored areas above the re-routed sewer pipeline and the associated western drainage swale) included a visual assessment of the following: (a) any areas where excessive settlement had occurred relative to the surrounding areas; (b) any drainage or growth problems (e.g., debris/sediment in riprap or areas of sparse vegetation, etc.);¹ and (c) other conditions that could jeopardize the performance of the completed remediation and sewer re-routing activities (e.g., burrows, vehicle ruts, unauthorized uses of areas, etc.) or the western drainage swale (e.g., obstructions or dislodged riprap, etc.), but not including drainage conveyances associated with the Building 71 and Hill 78 On-Plant Consolidation Areas (OPCAs).² The inspection also included an assessment of areas susceptible to erosion as a result of the remediation and sewer re-routing activities at this RAA (as identified on the attached inspection checklist), including, but not limited to, drainage areas and the western riprap swale, but again not including those associated with the OPCAs. Further, during this inspection, observations were made to determine whether there was significant erosion in any other part of the RAA (i.e., erosion that could change the post-remediation topography and alter the depth increments to which the Performance Standards apply); and the areas subject to inspection were specifically evaluated to determine whether there was any evidence of damage from the above-referenced tropical storm.

In addition to the above items, the existing structures that are part of the Other Ground-Covering Feature Area under the ERE for this RAA were inspected during the September 2011 inspection to determine if those structures were still present and intact.³

Finally, the inspection evaluated the revegetated areas to assess the condition of the grass/herbaceous cover, including any evidence of stressed or sparse cover, and to determine whether the vegetation is growing as anticipated and providing the desired degree of erosion control.⁴

Summary of Observations During Inspection and Planned Repairs

The results of the September 2011 inspection are provided in the attached Inspection Summary and Checklist form. As noted in that attached form, the September 2011 inspection indicated that the areas inspected at Hill 78 Area-Remainder were in good overall condition with the exception of the presence of vehicle ruts observed at four locations in the vicinity of the backfilled/restored areas north of Parcel K11-7-1. There was no observed evidence of erosion and no evidence of damage from the above-referenced tropical storm. The inspection also showed that existing structures that are part of the Other Ground-Covering Feature Area under the ERE for this RAA remain in place and intact.

¹ The requirement to assess the effectiveness of erosion controls in areas where vegetation is not yet established was not applicable, since the vegetation has been established at these areas.

² The inspections of features conveying storm water and/or surface cover drainage from the OPCAs – including the outlet pipes from the storm water basins, the outlet pipes for the drainage from the Building 71 and Hill 78 OPCA covers, and the eastern swale, drainage basin, and outlet associated with the re-routed sewer pipeline – are conducted under the Post-Removal Site Control program for the OPCAs in accordance with the Revised Post-Removal Site Control Plan included in the Final Completion Report for the OPCAs.

³ The portion of the access road south of the Hill 78 OPCA that GE has agreed to maintain as paved, shown in purple on Figure 4 – which is also part of the Other Ground-Covering Feature Area under the ERE – is and will continue to be inspected as part of the Post-Removal Site Control activities for the OPCAs.

⁴ The tree restoration/replacement activities conducted pursuant to the Tree Planting Plan submitted to EPA on November 12, 2009 (as amended by GE on January 25, 2010 and approved by EPA on January 26, 2010) are and will continue to be inspected as part of the Post-Removal Site Control activities for the OPCAs.

The areas of vehicle ruts in the vicinity of the backfilled/restored areas north of Parcel K11-7-1 will be repaired this fall. No need for other maintenance or repair activities was identified.

Schedule for Future Inspections

Future inspections of the Hill 78 Area-Remainder RAA will be conducted in accordance with the Post-Removal Site Control requirements specified in the Final Completion Report for this Removal Action. The backfilled/restored areas (including the restored areas above the re-routed sewer pipelines and the associated western drainage swale) will be inspected on an annual basis in August or September (unless and until EPA approves an alternate frequency), as well as after severe storms (defined as events causing a peak flow exceeding 3,500 cfs at the USGS gaging station at Coltsville), with the next scheduled inspection in August or September 2012. In addition, the existing structures that are part of the Other Ground-Covering Feature Area under the ERE for this RAA will be inspected annually in August or September to ensure that they remain in place and intact. The September 2011 inspection constituted the final inspection of the restored herbaceous vegetation, completing the two-year monitoring period for that vegetation.

Future inspections will utilize the Inspection Summary and Checklist form included in the Final Completion Report. Following each inspection, an inspection report will be prepared and submitted to EPA within 30 days of the completion of the inspection.

Please call me if you have any comments or questions.

Sincerely

Richard W. Gates /EGG

Richard W. Gates
Remediation Project Manager

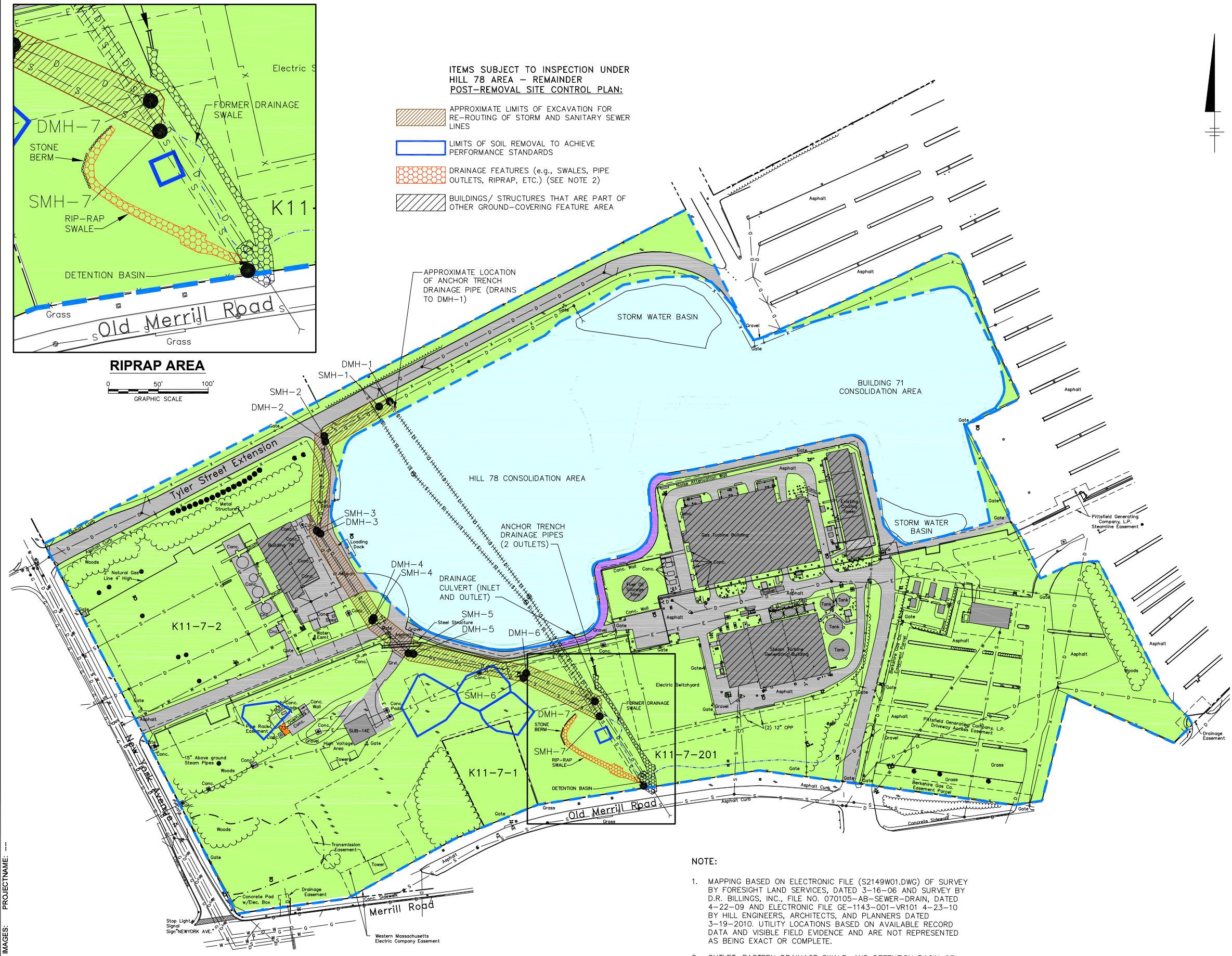
Attachments

cc: Dean Tagliaferro, EPA
John Kilborn, EPA*
Holly Inglis, EPA
Rose Howell, EPA (electronic copy)
Robert Leitch, USACE
Michael Gorski, MDEP*
Eva Tor, MDEP*
John Ziegler, MDEP (2 copies)
Linda Palmieri, Weston (2 copies)
Nancy E. Harper, MA AG*
Karen Pelto, MDEP*

Mayor James Ruberto, City of Pittsfield
Corydon L. Thurston, Director, PEDDA
Michael Carroll, GE *
Rod McLaren, GE*
Peter Wojcik, GE*
James Nuss, ARCADIS
James Bieke, Goodwin Procter
Public Information Repositories
GE Internal Repositories

**cover letter only*

CITY: SYRACUSE DIV/GROUP: ENVCAD DB: K SARTORI K DAVIS L FORAKER ID: PIC: P KEANEY PM: C AVERILL TM: E BREMER LVR: ONP OFF=REF*
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LEGEND (GENERAL ITEMS):

K11-7-2	PROPERTY ID
[Blue dashed line]	HILL 78 AREA-REMAINDER REMOVAL ACTION AREA BOUNDARY
[Light blue area]	HILL 78 AND BUILDING 71 CONSOLIDATION AREAS (NOT PART OF HILL 78 AREA- REMAINDER RAA)
[Black dashed line]	PROPERTY LINE
[Black dashed line]	EASEMENT LINE
[Black dashed line]	FENCE LINE
[Blue dashed line]	EDGE OF SWALE
[Wavy line]	EDGE OF WOODS
[Star symbol]	LIGHT POLE
[Circle with cross symbol]	UTILITY POLE
[Circle with dot symbol]	BUSH/TREE/SHRUB
[Square with cross symbol]	GAS MARKER
[Circle with dot symbol]	MANHOLE
[Circle with dot symbol]	SANITARY MANHOLE FOR RE-ROUTED PIPELINE
[Circle with dot symbol]	DRAIN MANHOLE FOR RE-ROUTED PIPELINE
[Square symbol]	CATCH BASIN
[Square with cross symbol]	ELECTRIC MANHOLE
[Square with cross symbol]	WATER VALVE
[Square with cross symbol]	FIRE HYDRANT
[Line with 'D' symbol]	STORM SEWER (DRAINAGE) LINE
[Line with 'E' symbol]	UNDERGROUND ELECTRIC LINE
[Line with 'S' symbol]	SANITARY LINE
[Line with 'W' symbol]	WATER LINE
[Line with 'G' symbol]	GAS LINE
[Dashed line with 'D' symbol]	ABANDONED STORM SEWER (DRAINAGE) LINE (TAKEN OUT OF SERVICE AND GROUDED)
[Dashed line with 'S' symbol]	ABANDONED SANITARY LINE (TAKEN OUT OF SERVICE AND GROUDED)
[Grey area]	BUILDING/STRUCTURE
[Orange area]	DEMOLISHED BUILDING
[Light grey area]	GE-OWNED PAVED AREA
[Light green area]	UNPAVED AREA
[Dotted area]	APPROXIMATE AREA OF PREVIOUS FILL MATERIAL PLACEMENT
[Green line]	LIMIT OF FINAL COVER FOR OPCAs
[Purple area]	APPROXIMATE SECTION OF PAVEMENT TO BE MAINTAINED BY GE UNDER THE POST-REMOVAL SITE CONTROL PLAN FOR THE OPCA
[Patterned area]	DRAINAGE FEATURES (E.G., PIPE OUTLETS, DETENTION BASINS, ETC.)
[Line with 'C' symbol]	CULVERT

GENERAL ELECTRIC COMPANY
 PITTSFIELD, MASSACHUSETTS
**FINAL COMPLETION REPORT FOR
 HILL 78 AREA - REMAINDER REMOVAL ACTION**

AREAS/ITEMS SUBJECT TO INSPECTION

ARCADIS

FIGURE
4

INSPECTION SUMMARY AND CHECKLIST

HILL 78 AREA-REMAINDER

I. GENERAL INFORMATION

Inspection Date: 9/27/2011
Conducted By/Phone Number: Gregg Rabasco / 413-822-1184
Weather Conditions: Mostly sunny, 70-75°F
Date of Last Inspection: 5/16/2011

II. INSPECTION SUMMARY

1. Confirm that Figure 4 from the Final Completion Report (FCR) and the as-built survey drawings included in Appendix E of the FCR (and any alternative plan proposed by GE) have been reviewed in the field during the inspection.

- Confirmed

2. **Backfilled/Restored Areas, Including Restored Areas Above Re-Routed Sewer Pipelines and Western Drainage Swale** (Note any physical changes since last inspection. Note evidence of any of the following: excessive settlement, surface water ponding, other drainage problems, burrows, vehicle ruts, unauthorized excavations, unauthorized uses of areas, or other problems that could jeopardize completed remediation actions or drainage swale. [Evidence of erosion will be described in Item 5 below.]

- Vehicle ruts were observed at four locations in the vicinity of the backfilled/restored areas north of Parcel K11-7-1.

3. **Structures That Are Part of Other Ground Covering Feature (OGCF) Area** (Confirm that structures that are part of OGCF Area under the Grant of Environmental Restriction and Easement for this area, as shown on Figure 4 of the FCR, are in place and intact. If not, inspect foundation slabs for evidence of excessive cracking, fissures, spalling, rutting, potholes, or exposed subgrade material.)

- Existing structures that are part of Other Ground-Covering Feature Area under the ERE remain in place and intact.

4. **Vegetation Area** (Note any physical changes since last inspection; note general condition of vegetative cover [e.g., evidence of stressed/sparse cover].)

- All areas in good condition.

5. **Areas Potentially Susceptible to Erosion** (Inspect any areas that are potentially subject to erosion as a result of the remediation, including the western drainage swale, edges of pavement located within the limits of the soil removal areas, and areas where vegetation is not yet established; and note evidence of any erosion. Include an inspection of the western riprap drainage swale; verify that there has been no significant movement of riprap or reduction in riprap thickness that threatens the stability of the swale, or results in the erosion of underlying soils or sediment or results in the exposure of underlying geotextile fabric [unless such fabric overlays concrete]. In addition, if any significant erosion is observed in any location in the Hill 78 Area-Remainder RAA that could change the post-remediation topography and alter the depth intervals to which the Performance Standards apply, note that condition.)

- 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, including parcel-specific restoration activities.)

- None

III. FOLLOW-UP MAINTENANCE AND REPAIR ACTIVITIES

- Repair vehicle ruts observed in the vicinity of the backfilled/restored areas north of Parcel K11-7-1.

ATTACH ADDITIONAL INFORMATION AS APPROPRIATE