



GE
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Transmitted Via Overnight Courier

August 31, 2007

Mr. Dean Tagliaferro
U.S. Environmental Protection Agency
Region I – New England
10 Lyman Street, Suite 2
Pittsfield, MA 01201

**Re: GE-Pittsfield/Housatonic River Site
East Street Area 2-North (GECD140)
Revised Attachment E – Post-Removal Site Control Plan**

Dear Mr. Tagliaferro:

Pursuant to Condition No. 3 of the United States Environmental Protection Agency's August 20, 2007 conditional approval letter for GE's *Final Removal Design/Removal Action Work Plan Addendum for East Street Area 2-North*, enclosed please find a revised Attachment E (Post-Removal Site Control Plan) and associated Figure E-1 for your review.

Please call me (413-448-5909) if you have any questions or comments regarding this report.

Sincerely,

Richard W. Gates
Remediation Project Manager

Enclosure

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cc: Richard Hull, EPA
Tim Conway, EPA
Holly Inglis, EPA
Rose Howell, EPA*
Linda Palmieri, Weston (2 copies, CD-ROM)
K.C. Mitkevicius, USACE (CD-ROM)
Susan Steenstrup, MDEP (2 copies)
Anna Symington, MDEP*
Jane Rothchild, MDEP*
Thomas Angus, MDEP*
Nancy E. Harper, MA AG*
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Jeffrey Bernstein, Bernstein, Cushner & Kimmel*
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Public Information Repositories
GE Internal Repository
* without attachments

Attachment E – Post-Removal Site Control Plan

In accordance with Section 3.7 of the *Statement of Work for Removal Actions Outside the River (SOW)*, which is Appendix E of the Consent Decree (CD), this Post-Removal Site Control Plan describes the future inspection, maintenance, and repair activities (I/M activities) to be conducted at the East Street Area 2-North Removal Action Area (RAA). Technical Attachment J to the SOW describes the future I/M activities required to be conducted by GE at all areas where soil removal and replacement activities are performed. Specifically, Section 2.3 of Attachment J sets forth the I/M requirements applicable to backfilled/restored areas such as those that will be present at East Street Area 2-North following completion of the remediation actions. The I/M activities described herein will be consistent with those requirements.

The CD and the SOW do not require I/M activities for paved areas and building foundations that have not been subject to remediation. However, based on an agreement between EPA and GE and on EPA's conditional approval letter of August 20, 2007, GE will either (a) conduct periodic inspections of the paved/building foundation areas within East Street Area 2-North and perform maintenance and repair activities for the pavement as necessary, or (b) cover the paved/building foundation areas with an appropriate soil cover and conduct inspection and maintenance activities for that soil cover.

In these circumstances, to assist in implementing the I/M activities at this RAA and as directed by EPA in its August 20, 2007 letter, GE has developed a figure showing two types of areas within this RAA: (1) areas that have been characterized on an unpaved grid sampling frequency, which would meet the definition of an "Open Soil/Vegetated Area" under a Grant of Environmental Restriction and Easement (ERE); and (2) areas that have been characterized as paved, as well as areas covered by existing buildings and building foundations, which would meet the definition of "Other Ground-Covering Feature Areas" under an ERE. This figure is provided as Figure E-1.¹ The area designations on this figure reflect current conditions and are subject to change, if appropriate, in the actual ERE(s) that will be developed for East Street Area 2-North, which will identify the final Open Soil/Vegetated Areas and Other Ground-Covering Feature Areas at this RAA.

¹ It should be noted that, consistent with EPA's recommendation in its August 20, 2007 letter, certain areas that are in fact currently paved or represent building foundations but have been characterized and evaluated as unpaved are shown as Open Soil/Vegetated Areas on Figure E-1.

The proposed I/M activities are described separately below for each of these types of areas. This Post-Removal Site Control Plan will be replaced by the Post-Removal Site Control Plan in the Final Completion Report for East Street Area 2-North, which will depict the final extent of the Open Soil/Vegetated Areas and Other Ground-Covering Feature Areas, as identified in the ERE(s).

Inspection Activities

The post-remediation inspections to be conducted at East Street Area 2-North are described below for Open Soil/Vegetated Areas and Other Ground-Covering Feature Areas.

Open Soil/Vegetated Areas

Within the Open Soil/Vegetated Areas, post-remediation inspections will be conducted at the specific areas that have been subject to remediation/restoration activities, consistent with the requirements in Section 2.3 of Attachment J to the SOW.² The inspections of these restored/backfilled areas will consist of visual observations, focusing on the following: (a) evidence of topsoil or gravel erosion (depending on the cover type); (b) the effectiveness of erosion controls in areas where vegetation is not established; (c) evidence of depressions and/or surface water ponding; (d) any areas where excessive settlement has occurred relative to the surrounding areas; (e) any drainage or growth problems due to possible over-compaction of the backfill materials; and (f) other conditions that could jeopardize the performance of the completed remediation actions. These inspections of backfilled/restored areas will be conducted approximately one month after completion of construction activities, semi-annually for the first year after restoration, and annually thereafter (subject to subsequent EPA approval of a different frequency). In addition to these regularly scheduled inspections, these backfilled/restored areas will be inspected following severe storms to verify that these areas have not sustained significant damage. For this purpose, a severe storm is defined as one in which a 15-minute instantaneous peak of 3,500 cubic feet per second (cfs) or greater is measured on the Housatonic River at the United States Geological Society (USGS) gauging station at Coltsville, MA.

² Although, as noted above, the Open Soil/Vegetated Areas include certain areas that are in fact currently paved or represent building foundations but have been characterized and evaluated as unpaved, remediation activities are not necessary in those areas, and hence those areas will not be subject to the inspection procedures described in this section.

In addition, the vegetation planted at the revegetated areas will be inspected semi-annually for a two-year period after the planting of the vegetation to assess the establishment, coverage, and condition of the vegetation, including any evidence of stressed or sparse cover, and to ensure that the vegetation is growing as anticipated and providing the desired degree of erosion control. These inspections will be conducted in the late spring and in the fall of each year during this two-year period.

Other Ground-Covering Feature Areas

Within the Other Ground-Covering Feature Areas, inspections will be conducted at any areas that are not covered by buildings at the time of the inspections. These will include paved and building foundation areas that are not covered by soil, as well as those that have been covered with a soil cover. (The areas underneath existing buildings will not be subject to such inspections unless the buildings are demolished.)

For areas that GE elects to maintain as paved, the inspections will be conducted approximately one month after completion of construction activities, semi-annually for the first year after restoration, and annually thereafter (subject to subsequent EPA approval of a different frequency), as well as after severe storms (as defined above). These inspections will consist of visual observations, focusing on: (1) in all such areas, evidence of excessive cracking, fissures, spalling, rutting, or potholes caused by heaving, uneven settlement, or vehicular use; and (2) in such areas that were subject to remediation activities, evidence of exposed subbase materials, excessive settlement relative to the surrounding areas, any drainage problems due to possible over-compaction of the backfill materials, and other conditions that could jeopardize the performance of the completed remediation.

For paved areas that GE has covered with an appropriate soil cover, the inspections will be conducted at the same frequencies described above for Open Soil/Vegetated Areas. These inspections will consist of visual observations, focusing on the following: (a) evidence of topsoil erosion; (b) the effectiveness of erosion controls in areas where vegetation is not established; (c) during the semi-annual vegetation inspections conducted during the two-year period after planting, the establishment, coverage, and condition of the vegetation planted on the soil cover; (d) evidence of depressions and/or surface water ponding; (e) any areas where excessive settlement has occurred relative to the surrounding areas; (f) any drainage or growth problems due to possible over-compaction of the soil cover materials; and (g) other conditions that could jeopardize the soil cover.

Maintenance and Repair Activities

GE will maintain and repair site features as necessary to meet the requirements of the CD and SOW, as well as those agreed upon with EPA for paved/building foundation areas. Maintenance and repair activities for Open Soil/Vegetated Areas and Other Ground-Covering Feature Areas are further described below.

Open Soil/Vegetated Areas

For areas that are inspected within the Open Soil/Vegetated Areas, maintenance and repair activities will be conducted as needed to address any conditions identified during the periodic inspections. Examples of such maintenance/repair activities include, but are not limited to, placement of additional topsoil in areas of erosion or settlement, repair or replacement of any components of the backfilled/restored areas exhibiting deficiencies or potential problems, and additional planting or seeding (if needed) to replace dead or dying vegetation.

Other Ground-Covering Feature Areas

For areas that are inspected within the Other Ground-Covering Feature Areas, maintenance and repair activities will be conducted as needed to address any conditions identified during the periodic inspections. Examples of such maintenance/repair activities in the areas maintained as paved include, but are not limited to, repair or replacement of pavement in areas of settlement or cracking, as well as repair or replacement of any components of the restoration exhibiting deficiencies or potential problems. Examples of maintenance/repair activities in the paved areas covered with a soil cover include, but are not limited to, placement of additional topsoil in areas of erosion or settlement, additional planting or seeding (if needed) to replace dead or dying vegetation on the soil cover, and repair or replacement of any other components of the soil cover exhibiting deficiencies or potential problems.

Reporting

Reports on the overall inspection activities will be prepared after each inspection. These reports will be submitted to EPA within 30 days of the inspection, and any deficiencies noted will be corrected within 90 days of the inspection (or as otherwise proposed by GE based on seasonal or other relevant factors). These reports will document I/M activities performed since submittal of the previous inspection report. As required by Attachment J of the SOW, these reports will include the following information (as relevant):

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- Description of the type and frequency of inspection and/or monitoring activities conducted;
 - Description of any significant modifications to the inspection and/or monitoring program made since submittal of the preceding monitoring report;
 - Description of any conditions or problems noted during the inspection and/or monitoring period which are affecting or may affect the completed remediation;
 - Description of any measures taken to correct conditions affecting the performance of the response action;
 - Results of any sampling analyses and screening conducted as part of the inspection and/or monitoring program; and
 - Description of any measures that may need to be performed to correct any conditions affecting the completed response actions.

Contact Information

In accordance with Section 2.0 of Technical Attachment J of the SOW, provided below is the name and contact information for the person who will be responsible for conducting inspection and monitoring activities at East Street Area 2-North. The individual shown below may change during the period that these activities are conducted.

Name	Company/Entity	Telephone Number
Richard W. Gates	General Electric Company	(413) 448-5909

