

Public Input on General Electric Submittals:

Interim Pre-Design Investigation Data Summary Report for
Upland Disposal Facility Area, dated December 6, 2022

&

Upland Disposal Facility Conceptual Design Plan,
dated December 6, 2022

February 2023



TOWN OF LEE

32 Main Street, Lee, MA 01238
www.lee.ma.us

R. Christopher Brittain
Town Administrator

TO: R1Housatonic@epa.gov

FROM: Town of Lee

DATE: February 12, 2023

RE: Comments on...

- Upland Disposal Facility Conceptual Design Plan (PDF)
- Interim Pre-Design Investigation Data Summary Report for Upland Disposal Facility Area (PDF)

The Town of Lee, Massachusetts would like to provide the following comments and suggestions related to the UDF design and Pre-Design Summary.

1. Section 3 of the document makes several references to vernal pool(s) which are severely threatened resources in Massachusetts, however, there is a lack any specificity of how the resource and surrounding habitat will be protected.
2. Section 2.3.7 states that semi-annual testing will take place. The town requests that these tests be completed on a quarterly basis to provide seasonal water quality data.
3. Section 3.7 states that modifications can be made to the analyte list. The town requests that only modifications that add to this testing be made and that no modifications are made that will remove any portions of this testing.
4. Section 3.8 states that hydraulic conductivity tests were completed “excluding the two deep monitoring wells”. The town requests that tests are also performed on deep wells.
5. Section 3.10 includes a cultural resources assessment that was completed by the same consultant as the other assessments. The town requests that the assessment be reviewed by an outside consultant that specializes in cultural resources.
6. The summary indicates that that UDF area is covered by 36% of forested area; however, the plan does not address how this will be restored or replaced to compensate for the loss of carbon sequestration resulting from removal of trees.



HOUSATONIC REST OF RIVER MUNICIPAL COMMITTEE

February 13, 2023

Dean Tagliaferro, EPA Project Manager
GE-Pittsfield/Housatonic River Site
Boston, MA
Submitted via email to R1Housatonic@epa.gov

Re: Comments on the *Upland Disposal Facility (UDF) Conceptual Design and UDF Pre-Design Investigation (PDI) Interim Data Summary*

Dear Mr. Tagliaferro:

The Housatonic Rest of River Municipal Committee (the Committee) respectfully submits the following comments on the *Upland Disposal Facility (UDF) Conceptual Design and UDF Pre-Design Investigation (PDI) Interim Data Summary*. GE prepared both documents in accordance with EPA's February 25, 2022 conditional approval letter for GE's Pre-Design Investigation Work Plan for the Upland Disposal Facility. The *UDF Conceptual Design Plan* was prepared to present the proposed conceptual design elements for the UDF and UDF support areas associated with the Rest of River (ROR) Remedial Action.

The *UDF Conceptual Design Plan* emphasizes that this document is conceptual and will be finalized after activities involved with ongoing Pre-Design Investigations (PDIs) and support area decisions are completed. This proposed schedule appears to proceed from a very draft (conceptual) design to a final design, with no interim deliverables, reviews and adjustments. This is unacceptable and GE must be required to submit interim design plans, for both EPA and public review, before advancing to final design. Both the interim and final design should allow for robust public comment, including a minimum 60 day comment period. There are questions of particular importance to the community (such as protectiveness of UDF activities to human health, aesthetics, transportation routes, times of operation etc.) that could benefit the final design.

The Committee's comments on the *Upland Disposal Facility (UDF) Conceptual Design and UDF Pre-Design Investigation (PDI) Interim Data Summary* are enclosed as Attachment A. In addition, the Committee has contracted to conduct an independent review, which is enclosed as Attachment C.

Sincerely,
The Housatonic Rest of River Municipal Committee

Enclosure: Attachment A - Housatonic Rest of River Municipal Committee Comments on the *Upland Disposal Facility (UDF) Conceptual Design and UDF Pre-Design Investigation (PDI) Interim Data Summary*

Enclosure: Attachment B - Technical Assistance Services for Communities Comments, January 20, 2023

Enclosure: Attachment C – TRC Technical Review of UDF Conceptual Design and Site Investigation Report, February 10, 2023

ATTACHMENT A
HOUSATONIC REST OF RIVER MUNICIPAL COMMITTEE
Comments on the Upland Disposal Facility (UDF) Conceptual Design and
UDF Pre-Design Investigation (PDI) Interim Data Summary
GE/Housatonic River - Rest of River

The *UDF Conceptual Design Plan* provides a conceptual design of the UDF consolidation area using the performance standards criteria combined with site characteristics gathered from various studies completed throughout the GE Parcel. Elements of site characteristics (such as groundwater flow and levels) are critical to the UDF design. These characteristics are described in the *Interim UDF PDI Data Summary Report*.

The *UDF Conceptual Design Plan* emphasizes that this document is conceptual and will be finalized after activities involved with ongoing Pre-Design Investigations (PDIs) and support area decisions are completed. This proposed schedule appears to proceed from a very draft (conceptual) design to a final design, with no interim deliverables, reviews and adjustments. This is unacceptable and GE must be required to submit interim design plans, for both EPA and public review, before advancing to final design.

In addition to providing an Interim UDF Design Plan, an independent and impartial contractor with appropriate expertise should be engaged to provide a comprehensive presentation to the public at the 75% design phase (or thereabouts). This would allow an interactive review of the proposed design during a public meeting where the design is presented for discussion prior to being finalized. The proposed design should be made available for public review prior to the presentation. The presentation will allow the public to provide comments and concerns for EPA's consideration and GE's incorporation. There are questions of particular importance to the community (such as protectiveness of UDF activities to human health, aesthetics, transportation routes, times of operation etc.) that could benefit the final design. Following public input, GE should produce a final design document that includes a responsiveness summary summarizing public questions/concerns provided during the meeting, and how GE addressed those questions/concerns in the document.

The Housatonic Rest of River Municipal Committee (the Committee) has several comments with regard to additional data collection opportunities for groundwater, surface water and sediment, and air monitoring. The safety of the UDF is of utmost concern to the Committee and the community must have the ability to be actively engaged in review of these documents at the early stages of the UDF design process through final design. The Committee has contracted with TRC to conduct an independent review of the geotechnical investigation, UDF conceptual design, UDF operational and support areas and groundwater depth and elevation monitoring. This independent review can be found as Attachment C. In addition, the Committee offers the following comments, which include specific recommendations to amend the UDF Conceptual Design Plan and for inclusion in an "Interim UDF Design Plan":

1. The GE Final Revised Permit states that seasonally high groundwater elevation will be projected using site-specific groundwater elevation data collected at the UDF, modified by an appropriate technical method that considers historical groundwater level fluctuations at similarly-sited off-site long-term monitoring wells in Massachusetts. The estimation will be performed pursuant to a methodology reviewed and approved by EPA. The UDF Conceptual Design Plan, indicates that GE has not presented the data interpretation methods to be used for estimating groundwater elevation projections to EPA.

The UDF Conceptual Design Plan should be amended to include the groundwater elevation projection data interpretation method as approved by EPA.

2. The UDF Conceptual Design Plan does not describe how materials will be managed and stored. Excavated topsoil removed during construction would typically be stored as berm material for later soil replenishment, capping and reclamation. The document does not mention whether topsoil will be sorted and held for later use. Similarly, there is likely a need to conduct tree and brush removal. These materials could also be retained for later soil amendment. The plan also mentions concrete debris material within and next to the consolidation area limits, but does not describe reuse or disposal of these materials.

The UDF Conceptual Design Plan should be amended to clarify where materials will be managed for later use or disposal, such as topsoil, vegetation materials and concrete debris and that all materials will be properly characterized before being reused or disposed of.

3. The UDF Conceptual Design Plan does not define placement of the UDF support areas, which is a significant data gap in understanding whether the groundwater monitoring program is sufficient. The UDF support area may include sediment dewatering and material handling areas that can yield liquid wastes of potential concern. The UDF area would likely include hydraulic transport features associated with the wet sediments removed from the river. The groundwater monitoring program could capture groundwater above, within and below these support areas so that any spilled contaminated material is contained.

The UDF Conceptual Design Plan should be amended and the groundwater monitoring program should be revised to capture possible spills from the UDF support areas.

4. The UDF Conceptual Design Plan does not describe features to help address spills or emergency releases of polychlorinated biphenyl (PCB)-contaminated materials. The UDF Conceptual Design Plan should be amended to include appropriate best management practices to control incidental releases of contaminated material.
5. There appears to be enough information for GE to develop a conceptual site model (CSM) of UDF groundwater that depicts groundwater levels in relation to UDF site features along a series of cross sections. This CSM could be updated to present groundwater conditions at various seasonal conditions. Such a model could also help to understand how groundwater is

affected by managed materials from the adjacent gravel mine and pond features that might be acting as groundwater sinks.

The UDF Conceptual Design Plan should be amended to include a groundwater conceptual model of the UDF to help understand variables that could affect groundwater movement (mined materials, pond features etc.).

6. The UDF Conceptual Design Plan does not include several surface water and groundwater-fed features identified within the Interim UDF PDI Data Summary that could influence UDF facility features (See Attachment B - Technical Assistance Services for Communities Comments, January 20, 2023, p 6). GE should map the surface water hydrologic features associated with the baseline topographic setting to effectively understand future water management needs.

The UDF Conceptual Design Plan should be amended to include a map of surface water features in addition to detailed topographic maps.

7. The UDF Conceptual Design Plan references priority habitat of rare species located 0.15 mile north of the GE Parcel, but does not identify the rare species. If this species is migratory, UDF construction and operation activities could occur within the species' life cycle required area. The UDF Conceptual Design Plan should be amended to identify the rare species.
8. EPA's 2022 Conditional Letter of Approval for the Pre-Design Investigation Work Plan for the UDF requested GE to "include the various debris and tailings piles within the UDF operational area...and shall visually characterize those materials to determine their appropriate disposition" (pdf page 3). There are considerable volumes of concrete debris shown on Figure 2 of the UDF Conceptual Design document. While concrete debris itself does not pose an environmental concern, these piles suggest that waste materials have been dumped erratically in the area. All materials onsite intended for reuse or disposal must be properly characterized.
9. According to the UDF Conceptual Design Plan, parts of the quarry ponds on the GE Parcel will be filled. There seems to be enough information to quantify the fill that will be placed in the northernmost quarry pond. GE should identify the type of fill and notify the Massachusetts Department of Environmental Protection (MassDEP) related to quarry fill to be consistent with MassDEP permitting requirements.
10. The prevailing groundwater flow direction is trending toward the west side of the GE Parcel. The existing monitoring wells that capture 'above' or upgradient areas are limited in number (See Attachment B - Technical Assistance Services for Communities Comments, January 20, 2023, p 8). GE should be required to conduct additional upgradient and background groundwater monitoring to thoroughly characterize both groundwater flow and quality

above, within and below the proposed UDF area. The plan for additional monitoring should take into consideration the detection of PFAS in groundwater.

EPA should work with GE to contact private landowners east of the UDF to determine if the properties rely on groundwater wells that could be incorporated into the UDF groundwater monitoring system. GE should work with the Town of Lee to obtain samples of potable water from their aquifer.

11. Based on the limited geotechnical data provided it cannot be confirmed that a demonstration has been made that the design will provide long-term stability and protectiveness of the environment and human health.

If additional geotechnical data is available, the UDF Conceptual Design Plan should be amended and detailed geotechnical analyses (slope stability, settlement, etc.) should be provided. If such data is not yet available, this data should be made available within The Interim UDF Design Plan.

12. The Settlement Agreement and revised RCRA permit require GE and their consultants to develop an estimate of the seasonally high groundwater elevation using the measured groundwater elevations in each well, modified by a technical method to be approved by EPA. The Performance Standards for the UDF require that the waste consolidation area have a maximum footprint of 20 acres and a maximum elevation of 1,099 feet above mean sea level (AMSL). However, if the seasonally high groundwater elevation is determined to be higher than 950 feet AMSL, the maximum elevation of the waste consolidation area may be increased by the number of feet between the seasonally high groundwater elevation and 950 feet AMSL.

The Interim UDF PDI Summary notes that since the groundwater monitoring program is ongoing the assessment of seasonally high groundwater will be included in a future submittal. Relative to the Performance Standards for the UDF noted above, the results to date of the groundwater monitoring program have identified groundwater elevations exceeding the 950 feet AMSL performance standard within the proposed waste consolidation area.

The UDF Conceptual Design Plan should be amended to document that the required separation distance has been reduced; otherwise, the UDF will need to be redesigned to maintain 15-foot separation and appropriately documented within the Interim UDF Design Plan.

13. According to the UDF Conceptual Design Plan, GE will prepare and record a Grant of Environmental Restriction and Easement (ERE) in accordance with the Consent Decree to, among other things, restrict the future use of and access to the UDF area. The Final Cover/Closure Plan for the UDF will describe GE's plans for preparing and recording this ERE. However, in the 2022 Conditional Letter of Approval for the Pre-design Investigation Work

Plan for the UDF, EPA asked GE to identify any constraints associated with the easement in the Conceptual Plan. The ERE will impose land use restrictions that may affect the Eversource utility easement and adjacent landowners. (See Attachment B - Technical Assistance Services for Communities Comments, January 20, 2023, p 4-5)

GE should immediately begin conversations to coordinate with several entities as plans for the UDF progress, including: Eversource Energy (owner of the utility line easement); private property owners to the east; and the gravel quarry to the west (Northeast Paving, a division of Eurovia Atlantic Coast, LLC). This coordination cannot be postponed until the Final Cover/Closure Plan for the UDF is developed.

The Interim UDF Design Plan should document how GE is coordinating with relevant entities to comply with the terms of the 2022 Conditional Letter of Approval for the Pre-design Investigation Work Plan for the UDF.

14. The UDF Conceptual Design Plan indicates that ‘mitigation’ of impacts, such as mitigation for the loss of regulated resource areas (i.e., dredge and fill activities affecting waters of the United States), will be addressed during additional PDI activities and the mitigation measures will be described in the Final Design Plan. There appears to be a considerable amount of information from which a preliminary mitigation approach can be developed at this time.

The Interim UDF Design Plan should include mitigation plans to address impacts to waters of the United States and other habitat areas.

15. The UDF Conceptual Design Plan does not mention if potential impacts attributable to climate change or geologic hazards were addressed as part of the design decisions. Groundwater elevations are one of the most important site characterizations that will define the UDF design. Modeled elevated groundwater levels that predict possible groundwater changes attributable to future climate change concerns should be evaluated. Similarly, catastrophic geologic hazards can adversely affect the UDF.

The Interim UDF Design Plan should take into consideration natural hazards such as those attributable to geologic hazards and climate change.

16. The UDF Conceptual Design Plan includes as Appendix C “Baseline Ecological Characterization and Habitat Assessment Report”. UDF sediment management practices may attract nuisance wildlife. Once wastes are transported into the UDF, water from the sediments might separate and create a surface layer in the disposal area. This ponded water could be an attractive habitat to migratory species. The proposed UDF is near several natural settings that attract wildlife activity (Woods Pond, the NRC parcel and the Housatonic River). It is important to understand the species living in and migrating through the area, to plan for the management and control of possible future exposures.

The Interim UDF Design Plan should include a revised Baseline Ecological Characterization and Habitat Assessment Report that describes impacts on natural resources and possible mitigation strategies for these impacts.

17. According to the UDF Conceptual Design Plan the man-made gravel-pit ponded areas provide aquatic conditions but they do not constitute federally regulated waters of the U.S. and are not regulated wetlands under the Massachusetts Wetlands Protection Act (MWPA). However, the southeastern pond has been inactive for at least five years, and therefore would be considered a Pond under MWPA regulations. Aerial photographs within the Interim PDI Data Summary indicate that the northern-most western pond may be historical and may not have been used by the gravel quarry as its aerial footprint has not changed substantially for over 20 years. (See Attachment B - Technical Assistance Services for Communities Comments, January 20, 2023, pp 12-13)

GE should verify which ponds are actively used and which ponds are inactive and the UDF Conceptual Design Plan should be amended accordingly.

The Interim UDF Design Plan should include all inactive ponds during the proposed baseline habitat surveys as they may have achieved wetland characteristics identified by MassDEP and all future pond-filling efforts should consider guidance set forth by MassDEP for gravel pit fill operations.

18. The UDF Conceptual Design Plan does not mention an intermittent drainage that discharges water into a wetland in the east-central area of the property, as described within Baseline Ecological Characterization and Habitat Assessment Report (Interim UDF PDI Data Summary Report Appendix C). This feature can convey stormwater and present a potential water management issue to be addressed in the design of the UDF. This drainage feature should be included within the UDF Conceptual Design Plan and best management feature components should be presented to address flows.

The Interim UDF Design Plan should incorporate management features to address surface water flows associated with the intermittent drainage identified in the Baseline Ecological Characterization and Habitat Assessment Report.

19. The PDI studies have been appropriately focused on groundwater. However, there are opportunities to gather both surface water and sediment for baseline characteristics. The constructed ponds to the west of the UDF consolidation area present a unique opportunity to capture surface water and sediment quality that may be affected by the UDF in the future. (See Attachment B - Technical Assistance Services for Communities Comments, January 20, 2023, pp 9-10)

The Interim UDF Design Plan should consider surface water and sediment samples co-located with surface water levels could be collected from the ponds located along the western edge of the UDF property.

20. The Interim PDI Data Summary report states that groundwater elevation data indicate a generally east-southeast to west-northwest groundwater elevation gradient and flow direction. Based on the available data, additional monitoring is necessary to fully understand varying groundwater levels. (See Attachment B - Technical Assistance Services for Communities Comments, January 20, 2023, p 7)

GE should be required to conduct additional monitoring of surface water depths in the two western ponds and additional piezometers west of MW-2022-5 and east of PZ-2022-1 to improve understanding of groundwater flow pathways.

21. The Interim PDI Data Summary report provides PCB results in split samples of soil collected by EPA. Conclusions in the document state that 'EPA's split samples are generally similar to the results from GE's samples. The data does not support this conclusion. (See Attachment B - Technical Assistance Services for Communities Comments, January 20, 2023, pp 10-11)

Since the Site is defined by PCB contamination, PCBs represent the most important analysis group to monitor for the UDF (Aroclor 1016 through 1268). The EPA analytical method yields lower detection limits and thereby allows for more refined soils analysis. It would be beneficial for future split sample analysis to target similar chemical groups and analytes. A thorough review of relative percent difference (RPD) between the analysis results may be needed. Future soil sampling analysis should rely on the EPA Aroclor analysis method to obtain lower detection limits and a better assessment of current conditions, and future split sampling should sample for more comparable chemicals.

22. According to the Interim PDI Data Summary, the weather station will remain in place and monitoring will be conducted until the start of UDF construction. The weather station should remain in place and monitoring should be conducted during construction, material processing/management, and during UDF operation to address community concerns regarding UDF airborne releases of PCB-contaminated materials.

23. According to the Interim PDI Data Summary, PFAS were detected in eight of the 11 groundwater wells sampled. Twenty-one different perfluoroalkyl chemicals were analyzed for in each sample. PFAS chemicals are being detected throughout the environment. There is public concern regarding their environmental persistence, mobility and toxicity. Given the occurrence of these chemicals in baseline groundwater sampling results, it is important to continue analyzing groundwater for PFAS and document whether the UDF is a source of PFAS in the future. (See Attachment B - Technical Assistance Services for Communities Comments, January 20, 2023, pp 13-14) It would be useful to have an analysis of soils (surface and subsurface) to understand the nature and extent of PFAS more fully. PFAS was not analyzed

as part of the soils monitoring efforts to date. PFAS should be added as an analytical group for the soil analysis.

EPA should work with GE and MADEP to continue analysis of groundwater for PFAS and work proactively and transparently to identify possible PFAS sources.

24. The Interim PDI Data Summary identifies groundwater water levels associated with well PZ-2022-8 as having 'dry' conditions in the last two monitoring efforts (October and November 2022). The well log indicates that the screen was installed within the anticipated saturated subsurface layer. It is unclear why this well did not have detectable water levels. (See Attachment B - Technical Assistance Services for Communities Comments, January 20, 2023, p 8)

GE should be required to install a piezometer upgradient of PZ-2022-8 to understand groundwater flows in this area.

25. The Interim UDF PDI Data Summary provided existing groundwater levels; however, it should be amended to include groundwater level contour maps developed using both historical and existing groundwater levels.
26. The Interim UDF PDI Data Summary does not provide all of the historical studies that contributed to the conclusions drawn in this document. There are at least three historical studies that are referenced and are not included in the Interim PDI Data Summary. (See Attachment B - Technical Assistance Services for Communities Comments, January 20, 2023, p 9)

The Interim UDF PDI Data Summary should be amended to include all of the historical studies used to characterize groundwater conditions. The amended Interim UDF PDI Data Summary should include a summary of all historical information describing groundwater quality in adjacent areas such as the Lee Landfill.

27. The Interim UDF PDI Data Summary appears to have relied on two monitoring wells (MW-84-1 and MW-84-2). Schweitzer-Mauduit and Lee Municipal Landfill monitoring wells provide additional data that should be considered. In addition, these monitoring wells could provide additional insight into typical groundwater flow pathways near the Housatonic River. (See Attachment B - Technical Assistance Services for Communities Comments, January 20, 2023, p 9)

The Interim UDF PDI Data Summary should be amended to include additional monitoring wells that can lend to the evaluation of typical groundwater flow pathways in the area.



Technical Assistance Services *for* Communities GE-Pittsfield/Housatonic River Site Comments on UDF Conceptual Design and UDF PDI Interim Data Summary January 20, 2023

Contract No.: 68HERH21A0018

Call Order Number: 68HERH22F0082 (14.0.0 OSRTI – Regional & Headquarters
TASC/CI Support)

Technical Direction: R1 2.7.14 GE Pittsfield

**Technical Assistance Services for Communities (TASC)
Comments on GE-Pittsfield/Housatonic River Site –
UDF Conceptual Design Plan and UDF PDI Interim Data Summary,
December 2022**

Introduction

This document provides TASC comments on the GE-Pittsfield/Housatonic River Site – Upland Disposal Facility (UDF) Conceptual Design and UDF Pre-Design Investigation (PDI) Interim Data Summary. This document is for the Berkshire Regional Planning Commission (BRPC) and municipalities to use as they develop comments to share with the U.S. Environmental Protection Agency (EPA). TASC does not make comments directly to EPA on behalf of communities. This document is funded by EPA’s TASC program. The contents do not necessarily reflect the policies, actions or positions of EPA.

In accordance with EPA’s February 25, 2022 conditional approval letter for GE’s Pre-Design Investigation Work Plan for the Upland Disposal Facility, GE prepared the Interim PDI Investigation Summary Report and UDF Conceptual Design Plan. The UDF Conceptual Design Plan was prepared to present the proposed conceptual design elements for the UDF and UDF support areas associated with the Rest of River (ROR) Remedial Action. The UDF will be constructed on a 75-acre property that was formerly part of an active sand and gravel quarry. GE acquired the property from The Lane Construction Corporation in April 2021. The GE Parcel will contain a UDF support area, which is currently undefined and may include facilities such as sediment dewatering, water treatment, and/or loading areas. GE began the PDI of the UDF area and conducted numerous PDI activities in 2022. PDI activities conducted through November 2022 are described in GE’s Interim PDI Data Summary Report for the Upland Disposal Facility Area. Additional PDI activities are ongoing and are planned to be completed in late 2023. Results from the PDI are used to develop the design for construction, operation, monitoring and maintenance of the UDF and associated facilities. A Final Design Plan for the UDF will be submitted at a later date.

Summary

The UDF Conceptual Design Plan has 10 sections:

- Introduction
- Design Summary
- Perimeter Berm and Baseline System
- Final Cover System
- UDF Operational and Support Areas
- Measures to Address Habitat Impacts
- UDF Closure
- UDF Post-Closure Activities
- Schedule
- References

The Interim PDI Data Summary Report for UDF Area has five sections and 12 appendices:

- Introduction
- Site Background and Historical Site Data Summary
- Pre-Design Investigation and Data Summary and Evaluation
- Schedule
- References
- Appendix A: 2010 Topographic Survey
- Appendix B: Soil Map – Berkshire County, Massachusetts
- Appendix C: Baseline Ecological Characterization and Habitat Assessment Report for Upland Disposal Facility Area
- Appendix D: 2022 Topographic Survey
- Appendix E: Geotechnical Data
- Appendix F: Arcadis Field Guide for USCS Soil Classification
- Appendix G: Soil Environmental Quality Data Validation Reports
- Appendix H: Piezometer and Monitoring Well Data
- Appendix I: Groundwater Environmental Quality Data Validation Reports
- Appendix J: Slug Tests Reports
- Appendix K: Phase 1A Cultural Resources Assessment Report for Upland Disposal Facility Area
- Appendix L: Phase 1B Intensive Archaeological Survey Report for Upland Disposal Facility Area

These are two separate documents, but GE submitted them to EPA under the same cover letter and they are companion documents.

TASC Comments

TASC compared the documents to the Statement of Work (SOW) and Revised Final Permit requirements. TASC also reviewed the February 2022 Conditional Approval of General Electric's November 24, 2021 Rest of River, Pre-Design Work Plan for Upland Disposal Facility (2022 Conditional Approval letter) and TASC comments provided on the November 2021 Upland Disposal Facility Pre-Design Work Plan (UDF PDI Work Plan) and July 2022 UDF Phase 1A Cultural Resources Assessment (CRA) document. Specific requirements for this interim document are limited in the guidance documents.

UDF Conceptual Design Plan: The UDF Conceptual Design Plan provides a conceptual design of the UDF consolidation area using the performance standards criteria combined with site characteristics gathered from various studies completed throughout the GE Parcel. Elements of site characteristics (such as groundwater flow and levels) are critical to the UDF design. Most comments generated by TASC focus on these studies. These characteristics are thoroughly described in the Interim UDF PDI Data Summary Report.

Interim UDF PDI Data Summary: This document is an interim status of data being used to design the UDF features. This interim status is an opportunity to address data gaps to ensure enough information is gathered to prepare a final design. TASC had several comments on additional data collection opportunities for groundwater, surface water and sediment, and air monitoring. Because the UDF is of particular community interest and the UDF design process is in its infancy, it seems appropriate for the community to be actively engaged in review of these documents. TASC suggests that the community request GE to hold a public outreach effort to discuss the rationale behind the conceptual design.

1. The UDF Conceptual Design Plan emphasizes that this document is conceptual and will be finalized after activities involved with ongoing PDIs and support area decisions are completed. This proposed schedule appears to proceed from a very draft (conceptual) design to a final design, with no interim deliverables, reviews and adjustments. To allow appropriate opportunity for community involvement, GE could provide a comprehensive presentation to the public. This would allow an interactive review of the proposed final (or close to final) design during a public meeting where GE presents the final design for discussion. The community may want to consider asking that the proposed final design be provided before the presentation. The presentation will allow the public to provide their initial comments and concerns for GE consideration and incorporation. There are questions of particular importance to the community (such as protectiveness of UDF activities to human health, aesthetics, transportation routes, times of operation etc.) that could benefit the design. GE could then produce a final design document that includes a responsiveness summary summarizing public questions/concerns provided during the meeting, and how GE addressed those questions/concerns in the document.

Given important concerns that the public has regarding design of the UDF, the community may want to ask EPA if GE could present a public meeting describing the UDF final design. Through this meeting, GE could understand community questions/concerns so they can be addressed in the final document.

2. In the 2022 Conditional Letter of Approval for the Pre-design Investigation Work Plan for the UDF, EPA asked GE to identify any constraints associated with the easement in the Conceptual Plan. When GE prepares and records a Grant of Environmental Restriction and Easement (ERE) to “prohibit excavation of the closed UDF...or utilization of groundwater underneath the UDF area (including a 500-foot zone around the waste consolidation area) and restrict future use of and access to the UDF area” (Section 7.3, pdf page 31), the ERE will impose land use restrictions that may affect the utility easement and adjacent landowners. Therefore, GE will likely need to coordinate with several entities as plans for the UDF progress, including:

- Eversource Energy (owner of the utility line easement).
- Private property owners on the east side, immediately adjacent to the Parcel.
- The gravel quarry to the west (Northeast Paving, a division of Eurovia Atlantic Coast, LLC).

Some potential ERE effects associated with each of these entities include:

The GE Parcel has an overhead Eversource Energy electric utility line easement with overhead electric utility lines on the western and southern sides of the GE Parcel. It is likely that Eversource will need continued access to maintain their utility corridor throughout UDF construction and operation.

Proximity of the GE Parcel to private parcels to the east (LB Corp. as shown on Figure 3, pdf page 52; and the private residence at 530 Woodland Road, Lee MA: Location ID: M_57116_900688) raises several questions:

- Has GE coordinated with the landowners to make them aware of possible impacts to their property from UDF construction and operation?
- Has GE considered cooperating with the landowners to determine if sampling of their groundwater wells (if they exist) could be incorporated into the UDF monitoring?
- Has GE considered a method to proactively communicate with these landowners to convey any emergency response needs in the instance of spills, accidents etc.?

The gravel quarry to the west of the GE Parcel (Northeast Paving, a division of Eurovia Atlantic Coast, LLC) includes several open pits and ponds. The ponds may be part of the materials washing and water management strategies of the mine. If the quarry is active and will continue to manage mined materials (removal and storage) and water storage in the future, it is unclear if these practices will conflict with the UDF or affect the groundwater flow pathway. When GE records the ERE to prohibit use of groundwater under the UDF including a 500-foot zone around the waste consolidation area, it is not clear how the inability to use groundwater (which recharges the quarry ponds) will affect the quarry function. Finally, a location stake marked ‘conservation area’ has been noted and mapped as part of the GE Parcel topographic maps (refer to Figure 2 Existing Conditions, pdf page 50).

This location may be linked to the gravel operation. TASC suggests that the purpose of this stake and its land use implication be determined.

The community may want to ask EPA if due diligence with the utility easement owner (Eversource), gravel quarry and adjacent landowners has been performed to ensure compatibility of the UDF with these adjacent property uses.

3. The UDF Conceptual Design document indicates that ‘mitigation’ of impacts, such as mitigation for the loss of regulated resource areas (such as dredge and fill activities affecting waters of the United States), will have data collection during additional PDI activities; the mitigation measures will be described in the Final Design Plan (pdf page 30). There seems to be a considerable amount of information from which a preliminary mitigation approach can be developed. There are potential opportunities for management and routing of stormwater run-on and run-off to be beneficial for the development of mitigation wetlands and other habitats (i.e., providing water to the vernal pool). There are certain GE Parcel features (such as the intermittent drainage discussed in Comment 7 below) that may need controls to minimize UDF disturbance from episodic flows. The management features for this drainage may also benefit mitigation projects.

The community may want to ask EPA if there is enough information for GE to include mitigation plans to address impacts to waters of the United States and other habitat areas.

4. The UDF Conceptual Design Plan does not describe how materials will be managed and stored. Excavated topsoil removed during construction would typically be stored as berm material for later soil replenishment, capping and reclamation. The document does not mention whether topsoil will be sorted and held for later use. Similarly, there is likely a need to conduct tree and brush removal. These materials could also be retained for later soil amendment. The plan also mentions concrete debris material within and next to the consolidation area limits, but does not describe how or if these materials will be disposed of.

The community may want to ask EPA if the Design Plan should be amended to discuss areas where materials will be managed for later use or disposal, such as topsoil, vegetation materials and concrete debris.

5. The UDF Conceptual Design Plan does not describe features to help address spills or emergency releases of polychlorinated biphenyl (PCB)-contaminated materials. UDF design could include appropriate best management practices to control incidental releases of contaminated material.

The community may want to ask EPA if the Design Plan should be amended to include features to address spills of contaminated material.

6. GE has indicated that parts of the quarry ponds on the GE Parcel will be filled. There seems to be enough information to quantify the fill that will be placed in the northernmost quarry pond. GE could identify the type of fill and notify the Massachusetts Department of Environmental Protection (MassDEP) related to quarry fill permitting, as needed (refer to information provided in Comment 25 below).

The community may want to ask EPA if GE should evaluate and quantify fill needed for the quarry pond and determine if MassDEP permit conditions apply.

6. The Baseline Ecological Characterization and Habitat Assessment Report (Appendix C of the Interim UDF PDI Data Summary Report) describes an intermittent drainage that discharges water into a wetland in the east-central area of the property (outside of the consolidation area, just north of the ‘North Storm Water Basin’ [North Storm Water Basin shown in Figure 4 of the UDF Conceptual Design; pdf page 52; intermittent drainage shown in Figure 5 of Appendix C of the Interim UDF PDI Data Summary Report, pdf page 221]). The drainage traverses the east-central wetland from east to west and conveys flow into another shrub wetland under the transmission line. All stream flow was observed to infiltrate into the ground at this western edge (Interim UDF PDI Data Summary Report, Appendix C, pdf page 188). This feature can convey stormwater and present a potential water management issue to be addressed in UDF design. The document does not mention this drainage feature or present best management feature components to address flows.

The community may want to ask EPA if the preliminary design should incorporate management features to address surface water flows associated with the intermittent drainage identified in the Baseline Ecological Characterization and Habitat Assessment Report.

7. The Interim UDF PDI Data Summary document identifies several surface water and groundwater-fed features that could influence UDF facility features:
 - There is an intermittent drainage in the northern area that connects two wetlands and absorbs into the groundwater on the west side of the GE Parcel.
 - As stated in the UDF PDI Data Summary document ‘the parcel contains several man-made or modified permanently flooded areas, which are associated with the prior quarry operations’ (pdf page 14; these features are assumed by TASC to be the quarry ponds on the west side of the GE Parcel, but are otherwise not described in the document).
 - The area impacted by previous gravel mining operations provides a setting comprised of unconsolidated, potentially porous media that can act as a conduit for surface water and groundwater flows.

The UDF PDI Data Summary document recognizes these issues and states “In the UDF area, grades indicate that drainage generally pitches internally towards the localized low points. There are limited areas of the GE Parcel that drain off site to the east along Woodland Road and to the former Lane property to the west” (pdf page 21). It seems important to map the surface water hydrologic features associated with the baseline topographic setting to effectively understand future water management needs. The report provides detailed topographic maps but does not provide a surface water feature map.

The community may want to ask EPA if the Design Plan should be amended to include a map of surface water features.

8. The undefined placement of the UDF support areas seems to be a significant data gap in understanding whether the groundwater monitoring program is sufficient. The UDF support area may include sediment dewatering and material handling areas that can yield liquid wastes of potential concern. The UDF area would likely include hydraulic transport features associated with the wet sediments removed from the river. The groundwater monitoring program could capture groundwater above, within and below these support areas so that any spilled contaminated material is contained.

The community may want to ask EPA if the groundwater monitoring program can be amended to capture possible spills from the UDF support areas.

9. There seems to be enough information for GE to develop a conceptual site model (CSM) of UDF groundwater that depicts groundwater levels in relation to UDF site features along a series of cross sections. This CSM could be updated to present groundwater conditions at various seasonal conditions. It could also help understand how groundwater is affected by managed materials from the adjacent gravel mine and pond features that might be acting as groundwater sinks.

The community may want to ask EPA if there is enough information for a groundwater conceptual model of the UDF to help understand variables that could affect groundwater movement (mined materials, pond features etc.).

10. The Interim PDI Data Summary report states that groundwater elevation data indicate a generally east-southeast to west-northwest groundwater elevation gradient and flow direction (pdf page 28). TASC reviewed the reported groundwater levels for the monitoring wells and piezometers (provided in Table 6 of the Interim PDI Data Summary report, pdf page 128). The groundwater levels demonstrate movement toward the west with some varying flow pathways along the western edge of the GE Parcel. These varying levels may be occurring in response to heterogenous subsurface materials that have been affected by the gravel mining operation. For instance, there is a notable groundwater high point around MW-2022-5, and low points around B-1, MW-2022-3 and MW-2022-6 (refer to Figure 6, pdf page 154, for well and boring locations). Based on data, there are areas where additional monitoring may help fully understand these varying groundwater levels. For example:

- Additional surface water depth measurements from the southwestern and northwestern ponds (bisected by the GE Parcel boundary) next to MW-2022-3 and MW-2022-2 may be beneficial. Pond water levels are affected by storm events and evaporation, but MP-1 levels are comparable to MW-2022-3 well levels. It appears the surface water MP-1 water level locations are a relatively good mirror to the adjacent groundwater.
- There are spatial gaps in areas west of MW-2022-5 (the high point) and east of PZ-2022-1 that could benefit from additional piezometer wells.

The community may want to ask EPA if additional monitoring of surface water depths in the two western ponds and additional piezometers west of MW-2022-5 and east of PZ-2022-1 could be added to improve understanding of groundwater flow pathways.

11. Review of groundwater water levels identified well PZ-2022-8 (Interim PDI Data Summary pdf page 128) as having ‘dry’ conditions in the last two monitoring efforts (October and November 2022). Review of the well log (pdf page 127) indicates that the screen was installed within the anticipated saturated subsurface layer. Assuming a similar water level rate of decrease in other monitoring wells, it is unclear why this well did not have detectable water levels. It may be important to install another piezometer upgradient and east of this well to capture a deeper saturated level.

The community may want to ask EPA if another piezometer upgradient of PZ-2022-8 would be useful to understand groundwater flows in this area.

12. Per requirements in the February 22, 2022 EPA “Conditional Approval Letter” for the PDI Work Plan for the UDF, “GE shall specify the date ranges over which the given ranges of water table elevations were collected.” These data are provided in Table 6 (pdf page 128), but it might be appropriate to begin developing groundwater flow maps by season or sampling event.

The community may want to ask EPA if groundwater level contour maps could be developed using the historical and existing groundwater levels provided in the Interim UDF PDI Data Summary document.

13. The prevailing groundwater flow direction is trending toward the west side of the GE Parcel. The existing monitoring wells that capture ‘above’ or upgradient areas are limited in number (refer to Figure 6, pdf page 154). Given the detection of PFAS in groundwater (further discussed in Comment 26) and the need to thoroughly characterize both groundwater flow and quality above, within and below the proposed UDF area, it seems appropriate to consider additional upgradient and background groundwater monitoring sampling to address public concerns. Recommendations for further upgradient/background monitoring could include:

- Review of the GE Parcel identifies two private landowners on the east side of the Parcel (as described in Comment 2). These properties may rely on groundwater wells as their water source. It may be appropriate to coordinate with the landowners to use these wells as part of UDF monitoring.
- There is a potable supply aquifer (Stockbridge marble aquifer) in the Lee area that has gathered community concern regarding the UDF placement (Culp, L. 2022). It may be proactive for GE to consider monitoring this aquifer using town of Lee infrastructure to address future public concerns.

The community may want to ask EPA if GE should consider contacting private landowners east of the UDF to determine if the properties rely on groundwater wells that could be incorporated into the UDF groundwater monitoring system; GE might also consider working with the town of Lee to obtain samples of potable water from their aquifer.

14. The GE Final Revised Permit (Section 5(2)(d), pdf page 60) states that seasonally high groundwater elevation will be projected using site-specific groundwater elevation data

collected at the UDF, modified by an appropriate technical method that considers historical groundwater level fluctuations at similarly-sited off-site long-term monitoring wells in Massachusetts. The estimation will be performed pursuant to a methodology reviewed and approved by EPA. This statement is provided again in the UDF Conceptual Design document (pdf page 12), indicating that GE has not presented the data interpretation methods to be used for estimating groundwater elevation projections.

The community may want to ask if EPA will be provided with the groundwater elevation projection data interpretation method as part of the document deliverable.

15. The Interim UDF PDI Data Summary document does not provide all historical studies used to characterize groundwater conditions. The Interim UDF PDI Data Summary Plan provides a copy of one historical groundwater study (Appendix H, pdf page 2254, ‘Re. Addendum to Hydrogeological Study at Sanitary Landfill’) that appears to be an addendum; the original report is not provided. The Interim UDF PDI Data Summary Plan mentions an ‘uncovered MassDEP’ file named “Evaluation Opinion Transmittal Report” (pdf page 16) that contains a summary of groundwater elevation data collected from monitoring wells around the nearby Schweitzer-Mauduit and Lee Municipal Landfills. In addition, Section 2.2.6 (pdf page 16) mentions ‘more recent groundwater quality data for the Lee Municipal Landfill have been collected as part of annual post-closure monitoring activities performed by the town of Lee’ (Tighe & Bond, 2021). This indicates that there are three historical studies (in addition to the one provided in Appendix H) that led to the conclusions drawn in this document. These studies are not included in the Interim PDI Data Summary document.

The community may want to ask EPA if the Data Summary document should include a summary of all historical information describing groundwater quality in adjacent areas such as the Lee Landfill.

16. The Data Summary document provides some Schweitzer-Mauduit and Lee Municipal Landfill monitoring wells in Appendix H (pdf page 2,254). This appendix provides data summaries for additional wells (MW-84-3, CW-1S, CW-1M, CW-1D, MW 94-7S, MW 94-7D, CW 88-1S, CW 88-1M, and CW 88-1D) beyond the two relied on in the Data Summary document (MW-84-1 and MW-84-2) (refer to data provided in Tables 3.1, 4-1 and 4-2 pdf pages 2,255 through 2,258). Data gathered from these wells could provide additional insight into typical groundwater flow pathways near the Housatonic River. The landfill area may not be as disturbed compared to the gravel quarry, which encompasses areas of mined, unconsolidated materials. Therefore, the landfill groundwater flow pathways may provide a better understanding of typical or background-type flow pathways, and could provide important flow dynamic information.

The community may want to ask EPA if there are additional monitoring wells associated with the landfill that can lend to the evaluation of typical groundwater flow pathways in the area.

17. The PDI studies have been appropriately focused on groundwater. However, there are opportunities to gather both surface water and sediment for baseline characteristics. The constructed ponds to the west of the UDF consolidation area present a unique opportunity to

capture surface water and sediment quality that may be affected by the UDF in the future. It appears that there is a linkage between site groundwater and pond surface water. It seems appropriate to establish surface water and sediment (solids and pore water) sampling locations for baseline and UDF monitoring. As stated in Comment 10, the pond water levels (MP-1) mirror adjacent groundwater levels indicating a potential value to the pond water level measures. Therefore, additional pond water levels taken from the more western ponds would be beneficial. Co-located surface water and sediment samples analyzed for chemical content would add valuable information to characterization of background conditions.

The community may want to ask the EPA if surface water and sediment samples co-located with surface water levels could be collected from the ponds located along the western edge of the UDF property.

18. Groundwater samples contained PFAS, which are chemicals of potential concern to human health and the environment. These substances have been used extensively in surface coating and protectant formulations and fire-fighting foam due to their unique surfactant properties. PFAS are ubiquitous in the environment. Considerable efforts are ongoing to understand the nature, extent and toxicology of these chemicals. It would be useful to have an analysis of soils (surface and subsurface) to understand the nature and extent of PFAS more fully. PFAS was not analyzed as part of the soils monitoring efforts to-date.

The community may want to ask EPA if PFAS could be added as an analytical group for the soil analysis.

19. EPA's 2022 Conditional Letter of Approval for the Pre-Design Investigation Work Plan for the UDF requested GE to "include the various debris and tailings piles within the UDF operational area..and shall visually characterize those materials to determine their appropriate disposition" (pdf page 3). There are considerable volumes of concrete debris shown on Figure 2 (pdf page 50) of the UDF Conceptual Design document. While concrete debris itself does not pose an environmental concern, these piles suggest that waste materials have been dumped erratically in the area; GE might consider further evaluating these piles to ensure that no other waste materials are present.

The community may want to ask EPA if GE could further evaluate the concrete debris piles to ensure there are no other waste materials in the piles.

20. Table 4B of the Interim PDI Data Summary report (pdf pages 115-126) provides PCB results in split samples of soil collected by EPA. Conclusions in the document state that 'EPA's split samples are generally similar to the results from GE's samples' (pdf page 25). However, results in Table 4B raise several questions:
 - Detection limits reported for EPA's split sample analysis are an order of magnitude lower than GE's (EPA detection limits range from 0.035-0.051 mg/kg, while Arcadis detection limits range from 0.21-0.33 mg/kg).
 - Inorganic results for the split samples are variable (e.g., zinc for B-2022-2; Arcadis result of 22.8 mg/kg varies substantially from its duplicate result of 31.4 mg/kg, and varies

substantially from EPA's result of 30 mg/kg. MW-2022-2 has an Arcadis result of 67 mg/kg, a duplicate result of 76.1 mg/kg, and an EPA split result of 110 mg/kg).

- The list of chemical groups and analytes are not consistent between Arcadis and EPA.

Since the Site is defined by PCB contamination, PCBs represent the most important analysis group to monitor for the UDF (Aroclor 1016 through 1268). The EPA analytical method yields lower detection limits and thereby allows for more refined soils analysis. It would be beneficial for future split sample analysis to target similar chemical groups and analytes. A thorough review of relative percent difference (RPD) between the analysis results may be needed.

The community may want to ask EPA if future soil sampling analysis could rely on the EPA Aroclor analysis method to obtain lower detection limits and a better assessment of current conditions, and if future split sampling should sample for more comparable chemicals.

21. The Interim PDI Data Summary document presents the location of the weather station (Figure 8, pdf page 156). This document says that monitoring will be conducted and the weather station will remain in place until the start of UDF construction. It seems important to continue monitoring during construction, and during material processing/management during UDF operation to address community concerns regarding UDF airborne releases of PCB-contaminated materials.

The community may want to ask EPA if the air monitoring efforts could continue during UDF construction and operation.

22. TASC recently reviewed the Sustainability and Climate Adaptation Plan (GE, 2022). Per the Revised Final Permit requirements, forthcoming ROR remedial actions will include an evaluation of possible climate change impacts to a proposed remedy. In addition, TASC previously commented on the UDF PDI about the evaluation of possible impacts of geologic hazards to the UDF design (based on the Washington State Department of Transportation's Geotechnical Design). The design document does not mention if potential impacts attributable to climate change or geologic hazards were addressed as part of the design decisions. Groundwater elevations are one of the most important site characterization that will define the UDF design. Modeled elevated groundwater levels that predict possible groundwater changes attributable to future climate change concerns should be evaluated. Similarly, catastrophic geologic hazards can adversely affect the UDF.

The community may want to ask EPA if natural hazards such as those attributable to geologic hazards and climate change were considered in the UDF design.

23. The document states that there is a priority habitat of rare species located 0.15 mile north of the GE Parcel (pdf page 14), but the rare species is not identified. If this species is migratory, UDF construction and operation activities could occur within the species' life cycle required area.

The community may want to ask EPA if GE could amend this document to identify the rare species.

24. Appendix C provides the Baseline Ecological Characterization and Habitat Assessment Report for the UDF. It provides thorough descriptions of natural setting features throughout the GE Parcel. It does not provide conclusions regarding impacts to the inventoried resources. There seems to be enough information in the Conceptual Design Plan to describe the nature of impacts attributable to conceptual design construction. TASC would like to raise the possibility that UDF sediment management practices may attract nuisance wildlife. Once wastes are transported into the UDF, water from the sediments might separate and create a surface layer in the disposal area. This ponded water could be an attractive habitat to migratory species. The proposed UDF is near several natural settings that attract wildlife activity (Woods Pond, the NRC parcel and the Housatonic River). It is important to understand the species living in and migrating through the area, to plan for the management and control of possible future exposures.

The community may want to ask EPA if the Baseline Ecological Characterization and Habitat Assessment Report can be revised to describe impacts on natural resources and possible mitigation strategies for these impacts.

25. The documents state that the man-made gravel-pit ponded areas provide aquatic conditions. Two of these ponds (the western ponds) are partly on the GE Parcel, and one pond (the southeastern-most pond) is entirely on the GE Parcel. The document states that ‘based on current regulatory criteria, the three ponds do not constitute federally regulated waters of the U.S., since they were created in upland settings for the purpose of treating water as part of the gravel pit wash-water system, and since the two westerly ponds remain in active use as part of the gravel pit operation, they are also not regulated wetlands under the Massachusetts Wetlands Protection Act (MWPA) regulations which exclude from the definition of Pond any “individual gravel pits.. excavated from upland areas unless inactive for five or more consecutive years” (310 CMR 10.04: definition of Pond) (Appendix C, pdf page 188-189). The southeastern pond has been inactive for at least five years, and therefore would be considered a Pond under MWPA regulations. Aerial photographs in the Data Summary document indicate that the northern-most western pond may be historical (Figure 14 of Phase 1B Cultural Resources Assessment, Appendix L of the Interim PDI Data Summary Report, pdf page 2740) and may not have been used by the gravel quarry because its aerial footprint has not changed substantially for over 20 years. Per the Ecological Characterization and Habitat Assessment (Appendix C) of the UDF PDI Data Summary document, this pond was eliminated from field surveys ‘because it retains an active use by the gravel quarry’ (pdf page 189). Furthermore, this feature may be filled to accommodate support area features. There are several considerations for this pond:

- The status of the pond should be clearly defined by the gravel quarry; is the pond necessary for facility operations and will the quarry continue managing the pond?
- The wetland status of this pond should be thoroughly evaluated given the historical footprint shown in aerial photographs.
- If GE backfills the pond to enhance UDF area use, then GE should consider MassDEP guidance for reclamation and filling of gravel quarry ponds (refer to references). MassDEP approves the operation or projects using large volumes of soil to reclaim

quarries, sand pits and gravel pits, and similar fill projects. The Massachusetts legislature has mandated that MassDEP establish regulations, guidelines, standards or procedures for determining the suitability of soil used as fill material for the reclamation of quarries, sand pits and gravel pits. The policy is applicable to quarries, sand pits and gravel pits that will accept 100,000 cubic yards or more. MassDEP approves Reclamation Soil projects pursuant to Section 277 of Chapter 165 of the Acts of 20141, M.G.L. c. 21E, § 6 and 310 CMR 40.0000, and M.G.L. c. 111, § 150A3 and 310 CMR 16.00 and 19.000 (MassDEP, 2015).

The community may want to ask EPA if the northern-most west pond should also be considered during the proposed baseline habitat surveys because this pond may have achieved wetland characteristics identified by MassDEP. In addition, the community may want to ask EPA if the future pond-filling efforts should consider guidance set forth by MassDEP for gravel pit fill operations.

26. PFAS were detected in eight of the 11 groundwater wells sampled (refer to results provided in Table 7A of the Interim PDI Data Summary Report, pdf pages 129 and 136). Twenty-one different perfluoroalkyl chemicals were analyzed for in each sample. A summary of the number of detected PFAS chemicals, and number of estimated PFAS detected chemicals are summarized in the below table.

Monitoring well sample	Number of detected PFAS chemicals	Number of estimated ^a PFAS detected chemicals
MW-2022-1D	3	4
MW-2022-1S	5	4
MW-2022-2	None detected	None estimated
MW-2022-3	None detected	None estimated
MW-2022-4D	None detected	2
MW-2022-4S	2	4
MW-2022-5	2	5
MW-2022-6	1	3
MW-2022-7	None detected	None estimated
MW-2022-8	None detected	1
MW-2022-9	6	3

^a The compound was positively identified; however, the associated numerical value is an estimated concentration only (pdf page 2,338).

PFAS chemicals are being detected throughout the environment. There is public concern regarding their environmental persistence, mobility and toxicity. Given the occurrence of these chemicals in baseline groundwater sampling results, it seems important to continue analyzing groundwater for PFAS and document whether the UDF is a source of PFAS in the future. It may be important to the community to be able to identify possible sources of PFAS in the area. Review of the Phase 1B Cultural Resources Assessment identified possible industrial features, such as a paper mill and a furnace, near the GE Parcel (Figures 8, 9 and 11; pdf pages 2,735, 2,736 and 2,738). The Phase 1B Cultural Resources Assessment

document identifies research efforts (Section 4.1, pdf pages 2,721-2,723) that may document historical industrial activities in the area. Some of these references include:

- Mulholland et al. 1977
- Jones 1992
- Jones and Berkland, 1992
- McDermott and Macomber, 1991
- Macomber 1992
- Macomber et al., 1992
- Donta, Blake and Barker, 2011

The community may want to ask EPA if continued analysis of groundwater for PFAS could occur, and if cultural resources could be shared with the public to help identify possible PFAS sources.

References Cited

AECOM. Phase 1A Cultural Resources Assessment Report for Upland Disposal Facility Area. July 2022. <https://semspub.epa.gov/work/01/666138.pdf>.

Anchor QEA, LLC (Anchor QEA), AECOM and Arcadis. Final Revised Rest of River Statement of Work. September 2021. <https://semspub.epa.gov/src/document/01/659938.pdf>.

Arcadis. Pre-Design Investigation Work Plan for Upland Disposal Facility. General Electric Company. November 2021. <https://semspub.epa.gov/work/01/661267.pdf>.

Arcadis and AECOM. Interim Pre-Design Investigation Data Summary Report for Upland Disposal Facility Area. GE-Pittsfield/Housatonic River Site. December 2022. <https://semspub.epa.gov/work/01/671716.pdf>.

Arcadis. Upland Disposal Facility Conceptual Design Plan. GE-Pittsfield/Housatonic River Site. December 2022. <https://semspub.epa.gov/work/01/671715.pdf>.

Culp, H.L., 2022. "Lee Board of Health: Rest of River Letter to GE. October 11, 2022. Volume III No. 20 10/15/2022 Stockbridge Updates. https://www.stockbridgeupdates.com/vol_iii_no_20_10-15-2022-lee_board_of_health_rest_of_river_letter_to_ge.html.

EPA. Conditional Approval of GE's November 24, 2021 submittal titled Rest of River, Pre-Design Investigation Work Plan for Upland Disposal Facility, GE-Pittsfield/Housatonic River Site. Letter. February 25, 2022. <https://semspub.epa.gov/work/01/663452.pdf>.

EPA. Revised Final Permit Modification to the 2016 Reissued RCRA Permit and Selection of CERCLA Remedial Action and Operation & Maintenance for Rest of River. December 2020. <https://semspub.epa.gov/src/document/01/650440.pdf>.

GE, 2022. (DRAFT for Review) GE-Pittsfield/Housatonic River Site, Rest of River, Plan for Implementing Future Projects or Work. December 16, 2022.
<https://sempub.epa.gov/work/01/671737.pdf>.

Massachusetts Department of Environmental Protection. "Reclamation Soils" Policy and Facilities. <https://www.mass.gov/service-details/reclamation-soils-policy-and-facilities>.

Massachusetts Department of Environmental Protection (MassDEP), 2015. Interim Policy on the Re-Use of Soil for Large Reclamation Projects Policy # COMM-15-01 August 28, 2015.
<https://www.mass.gov/doc/comm-15-01-interim-policy-on-the-re-use-of-soil-for-large-reclamation-projects/download>.

Technical Assistance Services for Communities (TASC) Program. TASC Comments on GE-Pittsfield/Housatonic River Site – Upland Disposal Facility, Phase IA Cultural Resources Assessment Report for Upland Disposal Facility Area, July 2022.

Technical Assistance Services for Communities (TASC) Program. TASC Comments on GE-Pittsfield/Housatonic River Site Pre-Design Investigation Work Plan for Upland Disposal Facility, November 2021.

State of Washington, Department of Transportation: Geotechnical Design Manual.
<https://wsdot.wa.gov/engineering-standards/all-manuals-and-standards/manuals/geotechnical-design-manual> (Chapter 6.: Seismic Design Guidelines. Guidelines:
<https://www.wsdot.wa.gov/publications/manuals/fulltext/M46-03/Chapter6.pdf>).

TASC Contact Information

Technical Advisor
Karmen King
970-852-0036
kking@skeo.com

Project Manager/Technical Advisor
Kirby Webster
802-227-7290
kwebster@skeo.com

Program Manager
Eric Marsh
817-752-3485
emarsh@skeo.com

Skeo Co-CEO and Director of Finance and
Contracts
Briana Branham
434-226-4284
bbranham@skeo.com

TASC Quality Control Monitor
Bruce Engelbert
703-953-6675
bengelbert@skeo.com



MEMORANDUM

TO: Wes Kelman, Seeger Weiss LLP
Melissa Provencher, BRPC
Jeff Hershberger
DATE: February 10, 2023

FROM: Amanda Wade
Shawn McGee
TRC PROJECT NO.: 016168.0000

SUBJECT: Technical Review of UDF Conceptual Design
and Site Investigation Report

COPY TO: Project File

TRC Environmental Corporation (TRC) provides this technical memorandum to Seeger Weiss LLP (Seeger Weiss) in support of the Housatonic Rest of River Municipal Committee (the Committee) and the Berkshire Regional Planning Commission (BRPC) related to the ongoing activities associated with the GE-Pittsfield/Housatonic River Superfund Site (the Site). This memorandum conveys the findings of TRC's review of the following two documents.

1. Interim Pre-Design Investigation Data Summary Report for Upland Disposal Facility Area (Arcadis, December 2022).
2. Upland Disposal Facility Conceptual Design Plan (Arcadis, December 2022).

These documents are related to the ongoing Rest of River remedial action. As requested by BRPC, TRC's review focused on the following objective.

- Whether these two documents provide the level of detail needed to ensure that the UDF is being designed to provide long-term, maximum protectiveness of the environment and human health.

The following memorandum is subdivided into comments on the following three topics.

1. Geotechnical investigation findings related to the design of the UDF
2. Conceptual UDF design
3. Other remedy components including depth to groundwater on the UDF site and the UDF operational and support components

BACKGROUND

In support of these evaluations, following are the documents that have been previously completed by General Electric and the pending documents as detailed in the Final Revised Rest of River Statement of Work (Anchor QEA, September 2021).

- **Revised RCRA Permit (December 2020)**
- Documents related to UDF Design
 - **Final Revised Rest of River Statement of Work (September 2021)**
 - **PDI Work Plan (November 2021)**
 - PDI Summary Report
 - *Interim PDI Summary Report*
 - *Final UDF PDI Summary Report (additional submittal)*
 - Remedial Design
 - Transportation and Disposal Plan
 - Onsite Plan
 - Offsite Plan

- Updated Project Operations Plan
 - Includes Air Monitoring Plan
- Quality of Life Compliance Plan
- Adaptive Management Plan
- UDF Design Plans
 - *Conceptual Design Plan*
 - Final Design Plan
 - Operation, Monitoring, and Maintenance Plan
 - Supplemental Information Package (following contractor selection)
 - Final Cover/Closure Plan
 - UDF Post-Closure Monitoring and Maintenance Plan

Documents above shown in **BOLD** have been issued final. The two documents that are the primary focus of this review are shown in *RED italics*. This listing was compiled to better understand the sequencing of documents and what documents are required to be submitted as part of the UDF design, construction, maintenance and monitoring following the two draft documents currently being reviewed.

GEOTECHNICAL INVESTIGATION

The objective of the geotechnical review was to determine if the geotechnical data provided (boring logs, laboratory testing results, and geotechnical analyses of the waste area) provide adequate information to demonstrate long-term stability and protectiveness of the environment and human health.

In summary, based on the limited geotechnical data provided in these documents as part of the pre-design phase of the project, TRC was not able to confirm that a demonstration has been adequately completed to demonstrate long-term stability of the UDF. TRC's initial observations are as follows:

1. A total of 22 borings were completed and are positioned within and outside of the anticipated UDF area limits - 16 of the 22 borings were utilized for soil quality testing purposes and 6 of the 22 borings were utilized for the installation of temporary piezometers within and outside of the UDF footprint. The number and locations of borings appear to be appropriate for the proposed design, however, a final determination if the exploration completed is appropriate cannot be completed until TRC has the opportunity to review the remaining data and analysis to be provided.
2. Limited geotechnical data was provided, including boring logs, laboratory testing results of index properties (e.g., grain size, moisture content, Atterberg limits, organic content, and specific gravity). However, there were no shear strength or consolidation testing reports provided in the documents that will be necessary to conduct global stability and settlement analyses.
3. The PDI Work Plan stated that undisturbed soil samples would be collected if cohesive soil was encountered. However, the IPID report indicated that cohesive soils were not encountered during the geotechnical investigations; therefore, soil samples were not collected for evaluation involving shear strength testing (e.g., triaxial shear test). The IPID Report also indicates that further evaluation of the data collected from the soil geotechnical investigation program and interpretations of those data are "ongoing and will be presented in the Final UDF PDI Summary Report". Therefore, TRC was not able to determine how the data that could and was collected will be used in the stability and settlement calculations.
4. The IPID Report stated that cross-sections through the UDF at the proposed excavation subgrade and final closure conditions were evaluated for global stability. SLOPE/W was used as an analysis tool for global stability evaluation and Spencer method was chosen to be the analysis

method. According to the previously mentioned document, design slopes were analyzed for both static and pseudo-static (seismic) conditions. SLOPE/W is an industry accepted software for two-dimensional slope stability analysis. However, due to the lack of the model description, input data, and output report, TRC was not able to determine if the long-term stability will be achieved with the proposed design.

In conclusion, based on the limited geotechnical data provided in the above referenced documents, TRC is not able to confirm that a demonstration has been made that the design will provide long-term stability and protectiveness of the environment and human health. We do recognize that the reports are part of a pre-design investigation and that detailed geotechnical analyses (slope stability, settlement, etc.) are forthcoming and will be provided as the design progresses. TRC can perform a detailed review of the additional data and analyses once made available.

UDF CONCEPTUAL DESIGN

TRC's review of the conceptual design focused on the engineered and operational components of the UDF. These included discussion of the liner and cover system components, leachate collection system discussion and sizing, stormwater management, and discussions of proposed landfilling procedures.

The proposed landfill liner build-up includes both a primary and secondary liner system comprised of both geosynthetic and soil components. Leachate is proposed to be collected from above both liner systems utilizing sumps and pumps and taken via forcemain to an onsite treatment facility before being discharged to the river. The cover system proposed for the landfill is also comprised of both soil and geosynthetic materials.

Based on this review, TRC has the following comments and recommendations:

- The proposed liner and cover system components meet the minimum regulatory requirements for landfill construction.
- A Construction Quality Assurance Plan and Technical Specifications should be prepared at the time of the final design. In addition to material specifications, these documents should outline the construction testing and oversight requirements to ensure that construction of the landfill is completed in accordance with the approved plans.
- A well-graded aggregate is proposed to be placed within the landfill as a protective layer above the leachate collection system. No additional specifications were provided for the aggregate material. Since this material sits directly above the leachate collection system, a minimum specific hydraulic conductivity equal to or greater than the proposed granular drainage layer should be specified to minimize conditions that would prohibit the internal flow of leachate.
- Calculations should be prepared to show that the thickness and composition of the proposed aggregate fill material is adequate to protect the composite liner from damage due to equipment and operations as well as freezing conditions.
- Sizing of the leachate collection system has not yet been completed. Additionally, there was no discussion of the parameters to be used to determine the minimum required leachate collection pipe size, perforation pattern, and pump rates.
- A granular drainage layer is not proposed on the internal slopes of the landfill containment berms. The absence of this layer, considered redundant by the design engineer, makes it critical that the specified

transmissivity of the geocomposite be adequate to handle the expected flows. We recommend that the Project Technical Specifications and Construction Quality Assurance Plan require that the material be tested in both the machine and transverse directions to allow for flexibility of panel placement during construction.

- While a secondary leachate collection system/leak detection system is proposed for the landfill, there is no discussion of the monitoring requirements for the flows within that system or the proposed corrective actions to be taken should observed flows exceed a proposed Action Leakage Rate. A Leak Detection Response Action Plan should be prepared and submitted with the final design that outlines monitoring, testing, and remedial measures to be taken based on observed flows above the secondary liner system.
- There is no discussion of the proposed leachate treatment requirements for the onsite leachate treatment facility or potential back-up capacity should the system require maintenance, experience a power loss, or exceed the design flow capacity.
- Stormwater Management System sizing has not yet been completed and no stormwater Best Management Practices (BMPs) were included within the conceptual plan.
- There is no discussion of the proposed fill plan for the landfill. We recommend that a Cell Development Plan be developed that shows the direction and timing of fill placement, internal access road construction, leachate flow directions, proposed timing for intermediate cover or phased final cover placement, and the potential installation of internal drainage layers to ensure the drainage of liquids from soil materials into the leachate collection system to ensure a stable waste mass.
- We recommend that the geocomposite material not exit the landfill into the anchor trench and that the primary and secondary geomembrane be fused together within the anchor trench to minimize the risk for leachate release from, and/or groundwater intrusion into, the leak detection system.
- We recommend that the geomembranes from the liner and cover system be fused together in the anchor trench to minimize the potential for release of liquids or gases to the subsurface after closure.
- No details were provided for the drainage layer outlets for the final cover system. The liquids within the drainage layer must exit the system to limit the potential for buildup of liquids within the cover drainage layer that can cause instability and ultimate failure of the cover soils above the geomembrane.
- There is no discussion of potential reuse options for the waste area upon completion of final cover system. Post-closure use options should be proposed as required in the Settlement Agreement.

Additional review of the proposed UDF design to develop final recommendations relative to whether the design provides adequate information to demonstrate long-term stability and protectiveness of the environment and human health can be completed once the additional information is provided.

OTHER REMEDY COMPONENTS

UDF Operational and Support Areas

No significant information was provided within the Conceptual Design submittal related to the following components of the remedy.

- Method(s) for conveyance of dredged or excavated material to the UDF and management methods once on the UDF property
- Management of Contact and Non-contact waters
- Groundwater Monitoring
- Air Monitoring
- Surface water management and monitoring

It is assumed that information on these aspects of the remedy will be provided in one or more of the following documents.

- Final Design Plan
- On-site Transportation and Disposal Plan
- UDF Operation, Maintenance, and Monitoring Plan
- Updated Project Operations Plan (air monitoring)

As such, TRC could not comment on these aspects of the remedy based on the limited information provided in the two draft documents. It will be important that the Committee be able to review and comment on any additional information provided relative to these remedy components when it becomes available. TRC feels that it is important for these aspects of the proposed remedy to be conveyed during the conceptual design stage or soon thereafter to allow for review and comment by interested parties prior to the issuance of the Final Design Plan.

Groundwater Depth and Elevation Monitoring

Six piezometers and eleven monitoring wells were installed as part of the PDI. GE and their consultants also utilized two monitoring wells related to the Lee Landfill and two surface water monitoring points located on an artificial pond on the UDF property and the Housatonic River. This monitoring is ongoing and expected to be completed by June 2023. The results of the monitoring to date were included in the Interim PDI Report.

The Settlement Agreement and revised RCRA permit require GE and their consultants to develop an estimate of the seasonally high groundwater elevation using the measured groundwater elevations in each well, modified by a technical method to be approved by EPA. The Performance Standards for the UDF require that the waste consolidation area have a maximum footprint of 20 acres and a maximum elevation of 1,099 feet above mean sea level (AMSL). However, if the seasonally high groundwater elevation is determined to be higher than 950 feet AMSL, the maximum elevation of the waste consolidation area may be increased by the number of feet between the seasonally high groundwater elevation and 950 feet AMSL.

The Interim PDI Summary Report notes that since the groundwater monitoring program is ongoing, and that the assessment of seasonally high groundwater will be included in a future submittal. Relative to the Performance Standards for the UDF noted above, the results to date of the groundwater monitoring program have identified groundwater elevations exceeding the 950 feet AMSL performance standard within the proposed waste consolidation area.

Following are some general comments on the groundwater monitoring program and the presentation of the final data. It is assumed that the final groundwater monitoring data and the assessment of seasonally high groundwater will be presented in the final PDI Report.

- Would be helpful to see cross-sections of the UDF relative to the proposed monitoring well network to verify that well depths and screen intervals are appropriate given the flow conditions established through the ongoing groundwater elevation monitoring program
- Groundwater flow maps should be included in the Final PDI Report based on collected groundwater elevation monitoring data under low groundwater, average groundwater, and high groundwater elevation conditions to allow for an assessment of groundwater flow conditions
- Hydrographs for well pairs (e.g, MW 2022-1S and MW 2022-1D) should be included on the same graphs in the Final PDI Report for ease of interpretation

Some general conclusions based on the groundwater elevation data collected to date.

- The groundwater monitoring program as designed and implemented by GE and their consultants should be adequate to support an evaluation of seasonally high groundwater, as well as design of the UDF.
- As noted previously, actual measured groundwater elevations within the anticipated waste consolidation area exceed the 950 feet AMSL threshold.
 - Redesign of the UDF to maintain 15-foot separation will be necessary unless the required separation distance is reduced
- Vertical hydraulic gradients measured in well pairs upgradient and downgradient of the anticipated waste consolidation area were upward (stronger upward downgradient of UDF)
 - This is a good condition for the monitoring of the landfill area
 - Any releases from the landfill should migrate laterally and/or upward from the landfill and are more likely to be detectable in the proposed monitoring network.

As noted previously relative to the reviews of the geotechnical information and the conceptual UDF design, additional review can be completed relative to the additional remedy components and the separation to groundwater once the additional groundwater elevation data is collected and presented and once some design information is provided for these other remedy components.

From: [Charles Cianfarini](#)
To: [R1Housatonic](#)
Subject: Citizens for PCB Removal commenting about Upland Disposal Facility Conceptual Design Plan
Date: Monday, February 13, 2023 6:02:01 PM
Attachments: [Outlook-mozjmf0c.png](#)

To EPA from Citizens for PCB Removal commenting about *Upland Disposal Facility Conceptual Design Plan*

February 13, 2023

Citizens for PCB Removal opposes the Upland Disposal Facility (read dump)!

We are submitting your own words:

Excerpts from Response in 2016 by EPA against Woods Pond location for landfill

<https://semspub.epa.gov/work/01/593922.pdf>

RESPONSE TO COMMENTS ON DRAFT PERMIT MODIFICATION AND STATEMENT OF BASIS FOR EPA'S PROPOSED REMEDIAL ACTION (RA) FOR THE HOUSATONIC RIVER, REST OF RIVER (463 pp, 3.06 MB)

10-1-2016

Pages 249-252

EPA Response 546: **EPA disagrees with GE's assertions, the characterization of EPA's**

analyses, and the conclusions of GE favoring on-site upland disposal of excavated material.

It is inconsistent for the Region to conclude that disposition of such material within that waterbody is acceptable, but that disposition of similar materials in a secure on-site upland disposal facility outside the floodplain in Berkshire County is not.

Response to Comments Housatonic River "Rest of River"

on-site disposal facilities may be less effective at containing waste than an off-site disposal

facility because the locations identified in the Revised CMS do not meet TSCA's siting

requirements for PCB landfills. See 40 C.F.R. § 761.75(b)(1).

GE's Revised CMS acknowledges that none of the three proposed landfill sites meet TSCA's requirements for soil characteristics including permeability. In addition, *Woods Pond* is located near a drinking water source and is located above a medium yield aquifer. The Revised CMS also notes that none of the three sites meet all of TSCA's requirements for a landfill site's hydrological characteristics and all three sites are located within close proximity to the Housatonic River.

As explained in EPA's Statement of Basis, "there is the potential for PCB releases to the Housatonic watershed if the landfills are not properly operated, monitored and maintained."

These factors increase the risks of potential future releases to the Housatonic watershed, compounded by the poor suitability of the proposed locations given such factors as soil permeability, proximity to the Housatonic watershed, and/or drinking water sources.

Here, no on-site locations have been identified that would meet the TSCA PCB landfill siting requirements.

Comment 485: The Commonwealth and the affected communities are seeking EPA's

affirmation that off-site disposal will remain a legally binding requirement in the Final Cleanup

Plan for Rest of River, as well as a more detailed explanation as to how it will be implemented in

a manner that is most protective of our interests and concerns.

(end of excerpts)

This design will not provide Overall Protectiveness of Human Health and the Environment due to your own analysis. Off-site facilities do not have the same issues as this inappropriately chosen location.

CPR also believes that the process that was used by EPA to produce the

**BICKERMAN DISPUTE RESOLUTION, PLLC MEDIATION AGREEMENT
BETWEEN**

General Electric Company, United States, State of Connecticut, C. Jeffrey Cook, Rest of River Municipal Committee, Berkshire Environmental Action Team, Housatonic River Initiative, City of Pittsfield, Mass Audubon

was flawed. It was secret and did not allow citizens in towns and cities along the river to have ANY KNOWLEDGE OR INPUT to the process. It violated both state and federal Environmental Justice tenets from your own website:

<https://www.epa.gov/environmentaljustice>

Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. This goal will be achieved when everyone enjoys:

The same degree of protection from environmental and health hazards, and

Equal access to the decision-making process to have a healthy environment in which to live, learn, and work.

None of General Electric's arguments were considered valid by EPA and the entire response linked above identifies the inconsistencies. Nowhere in any documents does it say that EPA makes its decisions solely on saving an egregious polluter money.

As we always have, we believe that EVERY decision should be based on Human Health, both near and far from the river.

Respectfully submitted,

Charles Cianfarini

Interim Director, Citizens for PCB Removal

Charlie C.



There is no cloud! - It's just someone else's computer!

In my opinion, we don't devote nearly enough scientific research to finding a cure for jerks.

—[Bill Watterson](#) (creator of Calvin and Hobbes)

From: [Tim Gray](#)
To: [R1Housatonic](#); [Tim Gray](#); [Judith Herkimer](#)
Subject: Upland Disposal Facility Conceptual Design Plan Comments
Date: Monday, February 13, 2023 8:26:28 PM
Attachments: [comments UDF Design.pages](#)

February 13, 2023

Please accept these comments on the GE

Upland Disposal Facility Conceptual Design Plan

GE-Pittsfield/Housatonic River Site

Submitted via email ((r1housatonic@epa.gov)

GE-Housatonic River Site Public Comments

EPA Region 1

5 Post Office Square (Mail Code SEMD-07-01) Boston, MA 02109-3912

The Housatonic Environmental Action League, Inc.

Raising Awareness – Sharing Knowledge – Bridging Advocates

Post Office Box 21, Cornwall Bridge, CT 06754-0021

and

The Housatonic River Initiative

Working for a fishable, swimmable river since 1992

165 Bradley Street, Lee, Ma, 01238

Page 1. Introduction

Page One States”In addition, “the GE Parcel will contain a UDF support area, which is currently undefined and not shown on the figure and which may include facilities such as sediment dewatering, water treatment, and/or loading areas”.

This statement is as vague as the EPA’s new project manager’s presentation at the recent Citizen Coordinating Committee meeting. He admitted several times to not being read up on the reports we were asking about. This report has the same recurring theme. **Very little information!**

Please note that we have identified each Paragraph that contains the phrase“FINAL DESIGN PLAN” to bring attention to how much information is missing from the Conceptual Design Plan and which EPA will have to rely on the Final Design Plan.

Page 2. Design Report Organization

“Note that some of the UDF components or UDF-related activities covered by the above-listed sections cannot be described in any detail at this time and **must await completion of the UDF design. These components and activities are identified as such in a number of sections of this Conceptual Design Plan and will be described in the Final Design Plan for the UDF.** The design information presented herein reflects the state of design as of the date of this Conceptual Design Plan and will be expanded upon in the **Final Design Plan and/or the associated UDF OMM Plan**”.

Page 3.

Mostly old general information we already have discussed.

Page 4 Pre Design Investigation

“Those activities include, among others, a baseline habitat assessment, a topographic and bathymetric field survey, a soil geotechnical evaluation, engineering and environmental soil testing, piezometer and monitoring well installation, groundwater elevation and quality testing, and a cultural resource assessment (CRA). These activities are briefly summarized below. The PDI is ongoing as of the date of this Conceptual Design Plan and is scheduled to be **completed in late 2023, after which all the data collected during the PDI will be presented in a Final Pre-Design Investigation Summary Report for the Upland Disposal Facility Area**”.

Page 21 “Given this situation as well as the fact that the design is only conceptual at this stage, the identification of habitat impacts has not been completed and will be evaluated further in the **Final Design Plan**”.

Page 6 2.3.7. Ground Water Quality Monitoring

“results from the monitoring in the remainder of 2022 and in 2023 will be presented in the Final UDF PDI Summary Report. The baseline groundwater chemical quality conditions will be used in developing a groundwater monitoring plan that will be implemented during construction and operation of the UDF and during the UDF final cover/closure period. Further description of the UDF groundwater monitoring plan will be provided in the UDF **Final Design**”.

2.4 Overhead Electrical Utility Line Easement “

“Design grading and location of other UDF-related features, including stormwater management system components and vehicle access areas along the easement, have not been completed. These features and grading conditions will be provided in the **Final Design Plan**”.

Page 7. 2.7. Leachate management

“The design of the leachate collection system has not been completed as part of the conceptual design. Therefore, this section contains limited detail regarding leachate management, with a more detailed design to be provided in the **Final Design Plan**”.

Management system components and vehicle access areas along the easement, have not been completed. These features and grading conditions will be provided in the **Final Design Plan**.

Page 8 2.9 UDF operational and support Areas

“The design aspects of the UDF operational and support areas have not been completed as part of the conceptual design. Therefore, those aspects are discussed in only a limited way in this Conceptual Design Plan and will be described in detail in the **Final Design Plan**”.

Page 9. 3.2 Perimeter Berm and Baseline System

“This description of the perimeter berm and baseliner system is conceptual and subject to revision based on the collection and evaluation of additional data (notably the additional groundwater elevation data) collected during the remainder of the PDI, as well as **additional design work**”.

Page 12. 3.3.5.1. Leachate Collection System Design

“This section provides some information regarding the leachate collection system. However, the design of the leachate collection system has not been completed, and a more detailed design will be included in the

Final Design Plan".

Page 13. 3.4. Site Excavation

"A mass earthwork analysis was performed as part of this Conceptual Design Plan. This analysis was inclusive of the perimeter berm and peripheral (conceptual) grading shown on Design Drawing 3. The analysis did not include the road/pipe corridor to the north, the UDF operational area located in the southeastern portion of the GE Parcel, or the stormwater basins shown on Design Drawing 3. Earthwork computations for these areas will be developed based on more advanced designs and the results provided in the **Final Design Plan**".

Page 16. 4.2.5. Disposal Capacity

"At the time of submittal of this Conceptual Design Plan, site groundwater elevation data are still being collected. Consequently, the **final floor elevation of the UDF has yet to be determined**".

4.3 Subsurface Drainage System Design

"The design of the subsurface drainage system has not been completed as part of the conceptual design. This section, therefore, contains only limited information regarding that system. A more detailed design will be provided in the **Final Design Plan**".

Page 19. 5.2 Disposal Material Management and Placement

"As of the date of this Conceptual Design Plan, methods for transporting dredged or excavated material to the UDF for disposal are still being evaluated but will include trucking or conveyance via slurry within a temporary pipe to the UDF. The methods and procedures for transport of material to the UDF will be described in GE's On- Site Transportation and Disposal Plan. The methods for managing and placing that material within the UDF are dependent on the means of delivery of the material from the remedial areas. The material will be placed in a manner that maximizes the capacity of the UDF and minimizes impacts to the community and environment. The disposal of such material at the UDF will be discussed further in the **Final Design Plan**".

Page 20 5.4. UDF Support Facilities

"It is anticipated that UDF support facilities will be constructed to provide access to the UDF perimeter berm, parking for personnel, staging for inbound/outbound materials and equipment, and a location for a leachate storage and treatment facility. More details regarding those support facilities, including their locations within the GE Parcel, will be provided in the **Final Design Plan**".

5.6 Air Monitoring

"Development of the baseline air monitoring program to be operated prior to use of the UDF and design of the air monitoring program to be implemented during construction and operation of the UDF have not been completed as part of the conceptual design. Therefore, those air monitoring programs will be described in the **Final Design Plan** and/or the associated UDF OMM Plan".

5.7 Surface Water Monitoring

"Surface water monitoring during UDF operation will be dependent on the design of the stormwater management system, which is still being developed and will be presented in the **Final Design Plan** and/or UDF OMM Plan".

Page 21 Measures to Address Habitat Impacts

"Given this situation as well as the fact that the design is only conceptual at this stage, the identification of

habitat impacts has not been completed and will be evaluated further in the **Final Design Plan**".

Page 22 UDF Closure

"The design of the UDF closure has not been completed as part of the conceptual design. As a result, this section provides only very limited information regarding UDF closure. The planned closure activities will be discussed further in **Final Design Plan**, with specific details to be presented in the Final Cover/Closure Plan for the UDF (described in Section 4.3.2.5 of the Final Revised SOW)"

Thanks you for allowing us to comment..

Timothy Gray HRI Judy Herkimer HEAL

.

.

February 13,2023

Please accept these comments on the GE

Upland Disposal Facility Conceptual Design Plan

GE-Pittsfield/Housatonic River Site

Submitted via email ((r1housatonic@epa.gov)

GE-Housatonic River Site Public Comments

EPA Region 1

5 Post Office Square (Mail Code SEMD-07-01) Boston, MA 02109-3912

The Housatonic Environmental Action League, Inc.

Raising Awareness – Sharing Knowledge – Bridging Advocates

Post Office Box 21, Cornwall Bridge, CT 06754-0021

and

The Housatonic River Initiative

Working for a fishable, swimmable river since 1992

165 Bradley Street, Lee, Ma, 01238

Page 1. Introduction

Page One States" In addition, "the GE Parcel will contain a UDF support area, which is currently undefined and not shown on the figure and which may include facilities such as sediment dewatering, water treatment, and/or loading areas".

This statement is as vague as the EPA's new project manager's presentation at the recent Citizen Coordinating Committee meeting. He admitted several times to not being read up on the reports we were asking about. This report has the same recurring theme. **Very little information!**

Please note that we have identified each Paragraph that contains the phrase“FINAL DESIGN PLAN” to bring attention to how much information is missing from the Conceptual Design Plan and which EPA will have to rely on the Final Design Plan.

Page 2. Design Report Organization

“Note that some of the UDF components or UDF-related activities covered by the above-listed sections cannot be described in any detail at this time and **must await completion of the UDF design. These components and activities are identified as such in a number of sections of this Conceptual Design Plan and will be described in the Final Design Plan for the UDF.** The design information presented herein reflects the state of design as of the date of this Conceptual Design Plan and will be expanded upon in the Final Design Plan and/or the associated UDF OMM Plan”.

Page 3.

Mostly old general information we already have discussed.

Page 4 Pre Design Investigation

“Those activities include, among others, a baseline habitat assessment, a topographic and bathymetric field survey, a soil geotechnical evaluation, engineering and environmental soil testing, piezometer and monitoring well installation, groundwater elevation and quality testing, and a cultural resource assessment (CRA). These activities are briefly summarized below. The PDI is ongoing as of the date of this Conceptual Design Plan and is scheduled to be **completed in late 2023, after which all the data collected during the PDI will be presented in a Final Pre-Design Investigation Summary Report for the Upland Disposal Facility Area**”.

Page 21 “Given this situation as well as the fact that the design is only conceptual at this stage, the identification of habitat impacts has not been completed and will be evaluated further in the Final Design Plan”.

Page 6 2.3.7. Ground Water Quality Monitoring

“results from the monitoring in the remainder of 2022 and in 2023 will be presented in the Final UDF PDI Summary Report. The baseline groundwater chemical quality conditions will be used in developing a groundwater monitoring plan that will be implemented during construction and operation of the UDF and during the UDF final cover/closure period. Further description of the UDF groundwater monitoring plan will be provided in the UDF Final Design”.

2.4 Overhead Electrical Utility Line Easement “

“Design grading and location of other UDF-related features, including stormwater management system components and vehicle access areas along the easement, have not been completed. These features and grading conditions will be provided in the Final Design Plan”.

Page 7. 2.7. Leachate management

“The design of the leachate collection system has not been completed as part of the conceptual design. Therefore, this section contains limited detail regarding leachate management, with a more detailed design to be provided in the Final Design Plan”.

Management system components and vehicle access areas along the easement, have not been completed. These features and grading conditions will be provided in the Final Design Plan.

Page 8 2.9 UDF operational and support Areas

“The design aspects of the UDF operational and support areas have not been completed as part of the conceptual design. Therefore, those aspects are discussed in only a limited way in this Conceptual

Design Plan and will be described in detail in the **Final Design Plan**".

Page 9. 3.2 Perimeter Berm and Baseline System

"This description of the perimeter berm and baseliner system is conceptual and subject to revision based on the collection and evaluation of additional data (notably the additional groundwater elevation data) collected during the remainder of the PDI, as well as **additional design work**".

Page 12. 3.3.5.1. Leachate Collection System Design

"This section provides some information regarding the leachate collection system. However, the design of the leachate collection system has not been completed, and a more detailed design will be included in the **Final Design Plan**".

Page 13. 3.4. Site Excavation

"A mass earthwork analysis was performed as part of this Conceptual Design Plan. This analysis was inclusive of the perimeter berm and peripheral (conceptual) grading shown on Design Drawing 3. The analysis did not include the road/pipe corridor to the north, the UDF operational area located in the southeastern portion of the GE Parcel, or the stormwater basins shown on Design Drawing 3. Earthwork computations for these areas will be developed based on more advanced designs and the results provided in the **Final Design Plan**".

Page 16. 4.2.5. Disposal Capacity

"At the time of submittal of this Conceptual Design Plan, site groundwater elevation data are still being collected. Consequently, the **final floor elevation of the UDF has yet to be determined**".

4.3 Subsurface Drainage System Design

"The design of the subsurface drainage system has not been completed as part of the conceptual design. This section, therefore, contains only limited information regarding that system. A more detailed design will be provided in the **Final Design Plan**".

Page 19. 5.2 Disposal Material Management and Placement

"As of the date of this Conceptual Design Plan, methods for transporting dredged or excavated material to the UDF for disposal are still being evaluated but will include trucking or conveyance via slurry within a temporary pipe to the UDF. The methods and procedures for transport of material to the UDF will be described in GE's On- Site Transportation and Disposal Plan. The methods for managing and placing that material within the UDF are dependent on the means of delivery of the material from the remedial areas. The material will be placed in a manner that maximizes the capacity of the UDF and minimizes impacts to the community and environment. The disposal of such material at the UDF will be discussed further in the **Final Design Plan**".

Page 20 5.4. UDF Support Facilities

"It is anticipated that UDF support facilities will be constructed to provide access to the UDF perimeter berm, parking for personnel, staging for inbound/outbound materials and equipment, and a location for a leachate storage and treatment facility. More details regarding those support facilities, including their locations within the GE Parcel, will be provided in the **Final Design Plan**".

5.6 Air Monitoring

“Development of the baseline air monitoring program to be operated prior to use of the UDF and design of the air monitoring program to be implemented during construction and operation of the UDF have not been completed as part of the conceptual design. Therefore, those air monitoring programs will be described in the **Final Design Plan** and/or the associated UDF OMM Plan”.

5.7 Surface Water Monitoring

“Surface water monitoring during UDF operation will be dependent on the design of the stormwater management system, which is still being developed and will be presented in the **Final Design Plan** and/or UDF OMM Plan”.

Page 21 Measures to Address Habitat Impacts

“Given this situation as well as the fact that the design is only conceptual at this stage, the identification of habitat impacts has not been completed and will be evaluated further in the **Final Design Plan**”.

Page 22 UDF Closure

“The design of the UDF closure has not been completed as part of the conceptual design. As a result, this section provides only very limited information regarding UDF closure. The planned closure activities will be discussed further in **Final Design Plan**, with specific details to be presented in the Final Cover/Closure Plan for the UDF (described in Section 4.3.2.5 of the Final Revised SOW)”

Thanks you for allowing us to comment..

Timothy Gray HRI Judy Herkimer HEAL

February 13,2023

Please accept these comments on the GE

Upland Disposal Facility Conceptual Design Plan

GE-Pittsfield/Housatonic River Site

Submitted via email ((r1housatonic@epa.gov)

GE-Housatonic River Site Public Comments

EPA Region 1

5 Post Office Square (Mail Code SEMD-07-01) Boston, MA 02109-3912

The Housatonic Environmental Action League, Inc.
Raising Awareness – Sharing Knowledge – Bridging Advocates
Post Office Box 21, Cornwall Bridge, CT 06754-0021
and
The Housatonic River Initiative
Working for a fishable, swimmable river since 1992
165 Bradley Street, Lee, Ma, 01238

Page 1. Introduction

Page One States “In addition, “the GE Parcel will contain a UDF support area, which is currently undefined and not shown on the figure and which may include facilities such as sediment dewatering, water treatment, and/or loading areas”.

This statement is as vague as the EPA’s new project manager’s presentation at the recent Citizen Coordinating Committee meeting. He admitted several times to not being read up on the reports we were asking about. This report has the same recurring theme. **Very little information!**

Please note that we have identified each Paragraph that contains the phrase “FINAL DESIGN PLAN” to bring attention to how much information is missing from the Conceptual Design Plan and which EPA will have to rely on the Final Design Plan.

Page 2. Design Report Organization

“Note that some of the UDF components or UDF-related activities covered by the above-listed sections cannot be described in any detail at this time and **must await completion of the UDF design. These components and activities are identified as such in a number of sections of this Conceptual Design Plan and will be described in the Final Design Plan for the UDF.** The design information presented herein reflects the state of design as of the date of this Conceptual Design Plan and will be expanded upon in the **Final Design Plan and/or the associated UDF OMM Plan**”.

Page 3.

Mostly old general information we already have discussed.

Page 4 Pre Design Investigation

“Those activities include, among others, a baseline habitat assessment, a topographic and bathymetric field survey, a soil geotechnical evaluation, engineering and environmental soil testing, piezometer and monitoring well installation, groundwater elevation and quality testing, and a cultural resource assessment (CRA). These activities are briefly summarized below. The PDI is ongoing as of the date of this Conceptual Design Plan and is scheduled to be **completed in late 2023, after which all the data collected during the PDI will be presented in a Final Pre-Design Investigation Summary Report for the Upland Disposal Facility Area**”.

Page 21 “Given this situation as well as the fact that the design is only conceptual at this stage, the identification of habitat impacts has not been completed and will be evaluated further in the **Final Design Plan**”.

Page 6 2.3.7. Ground Water Quality Monitoring

“results from the monitoring in the remainder of 2022 and in 2023 will be presented in the Final UDF PDI Summary Report. The baseline groundwater chemical quality conditions will be used in developing a groundwater monitoring plan that will be implemented during construction and operation of the UDF and during the UDF final cover/closure period. Further description of the UDF groundwater monitoring plan will be provided in the UDF **Final Design**”.

2.4 Overhead Electrical Utility Line Easement “

“Design grading and location of other UDF-related features, including stormwater management system components and vehicle access areas along the easement, have not been completed. These features and grading conditions will be provided in the **Final Design Plan**”.

Page 7. 2.7. Leachate management

“The design of the leachate collection system has not been completed as part of the conceptual design. Therefore, this section contains limited detail regarding leachate management, with a more detailed design to be provided in the **Final Design Plan**”.

Management system components and vehicle access areas along the easement, have not been completed. These features and grading conditions will be provided in the **Final Design Plan**.

Page 8 2.9 UDF operational and support Areas

“The design aspects of the UDF operational and support areas have not been completed as part of the conceptual design. Therefore, those aspects are discussed in only a limited way in this Conceptual Design Plan and will be described in detail in the **Final Design Plan**”.

Page 9. 3.2 Perimeter Berm and Baseline System

“This description of the perimeter berm and baseliner system is conceptual and subject to revision based on the collection and evaluation of additional data (notably the additional groundwater elevation data) collected during the remainder of the PDI, as well as **additional design work**”.

Page 12. 3.3.5.1. Leachate Collection System Design

“This section provides some information regarding the leachate collection system. However, the design of the leachate collection system has not been completed, and a more detailed design will be included in the **Final Design Plan**”.

Page 13. 3.4. Site Excavation

“A mass earthwork analysis was performed as part of this Conceptual Design Plan. This analysis was inclusive of the perimeter berm and peripheral (conceptual) grading shown on Design Drawing 3. The analysis did not include the road/pipe corridor to the north, the UDF operational area located in the southeastern portion of the GE Parcel, or the stormwater basins shown on Design Drawing 3. Earthwork computations for these areas will be developed based on more advanced designs and the results provided in the **Final Design Plan**”.

Page 16. 4.2.5. Disposal Capacity

“At the time of submittal of this Conceptual Design Plan, site groundwater elevation data are still being collected. Consequently, the **final floor elevation of the UDF has yet to be determined**”.

4.3 Subsurface Drainage System Design

“The design of the subsurface drainage system has not been completed as part of the conceptual design. This section, therefore, contains only limited information regarding that system. A more detailed design will be provided in the **Final Design Plan**”.

Page 19. 5.2 Disposal Material Management and Placement

“As of the date of this Conceptual Design Plan, methods for transporting dredged or excavated material to the UDF for disposal are still being evaluated but will include trucking or conveyance via slurry within a temporary pipe to the UDF. The methods and procedures for transport of material to the UDF will be described in GE’s On- Site Transportation and Disposal Plan. The methods for managing and placing that material within the UDF are dependent on the means of delivery of the material from the remedial areas. The material will be placed in a manner that maximizes the capacity of the UDF and minimizes impacts to the community and environment. The disposal of such material at the UDF will be discussed further in the **Final Design Plan**”.

Page 20 5.4. UDF Support Facilities

“It is anticipated that UDF support facilities will be constructed to provide access to the UDF perimeter berm, parking for personnel, staging for inbound/outbound materials and equipment, and a location for a leachate storage and treatment facility. More details regarding those support facilities, including their locations within the GE Parcel, will be provided in the **Final Design Plan**”

5.6 Air Monitoring

“Development of the baseline air monitoring program to be operated prior to use of the UDF and design of the air monitoring program to be implemented during construction and operation of the UDF have not been completed as part of the conceptual design. Therefore, those air monitoring programs will be described in the **Final Design Plan** and/or the associated UDF OMM Plan”.

5.7 Surface Water Monitoring

“Surface water monitoring during UDF operation will be dependent on the design of the stormwater management system, which is still being developed and will be presented in the **Final Design Plan** and/or UDF OMM Plan”.

Page 21 Measures to Address Habitat Impacts

“Given this situation as well as the fact that the design is only conceptual at this stage, the identification of habitat impacts has not been completed and will be evaluated further in the **Final Design Plan**”.

Page 22 UDF Closure

“The design of the UDF closure has not been completed as part of the conceptual design. As a result, this section provides only very limited information regarding UDF closure. The planned closure activities will be discussed further in **Final Design Plan**, with specific details to be presented in the Final Cover/Closure Plan for the UDF (described in Section 4.3.2.5 of the Final Revised SOW)”

Thanks you for allowing us to comment..

Timothy Gray HRI Judy Herkimer HEAL

.

.

February 13,2023

Please accept these comments on the GE

Upland Disposal Facility Conceptual Design Plan

GE-Pittsfield/Housatonic River Site

Submitted via email ((r1housatonic@epa.gov)

GE-Housatonic River Site Public Comments

EPA Region 1

5 Post Office Square (Mail Code SEMD-07-01) Boston, MA 02109-3912

The Housatonic Environmental Action League, Inc.

Raising Awareness – Sharing Knowledge – Bridging Advocates

Post Office Box 21, Cornwall Bridge, CT 06754-0021

and

The Housatonic River Initiative

Working for a fishable, swimmable river since 1992

165 Bradley Street, Lee, Ma, 01238

Page 1. Introduction

Page One States”In addition, “the GE Parcel will contain a UDF support area, which is currently undefined and not shown on the figure and which may include facilities such as sediment dewatering, water treatment, and/or loading areas”.

This statement is as vague as the EPA’s new project manager’s presentation at the recent Citizen Coordinating Committee meeting. He admitted several times to not being read up on the reports we were asking about. This report has the same recurring theme. **Very little information!**

Please note that we have identified each Paragraph that contains the phrase“FINAL DESIGN PLAN” to bring attention to how much information is missing from the Conceptual Design Plan and which EPA will have to rely on the Final Design Plan.

Page 2. Design Report Organization

“Note that some of the UDF components or UDF-related activities covered by the above-listed sections cannot be described in any detail at this time and **must await completion of the UDF design. These components and activities are identified as such in a number of sections of this Conceptual Design Plan and will be described in the Final Design Plan for the UDF**. The design information presented herein reflects the state of design as of the date of this Conceptual Design Plan and will be expanded upon in the **Final Design Plan and/or the associated UDF OMM Plan**”.

Page 3.

Mostly old general information we already have discussed.

Page 4 Pre Design Investigation

“Those activities include, among others, a baseline habitat assessment, a topographic and bathymetric field survey, a soil geotechnical evaluation, engineering and environmental soil testing, piezometer and monitoring well installation, groundwater elevation and quality testing, and a cultural resource assessment (CRA). These activities are briefly summarized below. The PDI is ongoing as of the date of this Conceptual Design Plan and is scheduled to be **completed in late 2023, after which all the data collected during the PDI will be presented in a Final Pre-Design Investigation Summary Report for the Upland Disposal Facility Area**”.

Page 21 “Given this situation as well as the fact that the design is only conceptual at this stage, the identification of habitat impacts has not been completed and will be evaluated further in the **Final Design Plan**”.

Page 6 2.3.7. Ground Water Quality Monitoring

“results from the monitoring in the remainder of 2022 and in 2023 will be presented in the Final UDF PDI Summary Report. The baseline groundwater chemical quality conditions will be used in developing a groundwater monitoring plan that will be implemented during construction and operation of the UDF and during the UDF final cover/closure period. Further description of the UDF groundwater monitoring plan will be provided in the UDF **Final Design**”.

2.4 Overhead Electrical Utility Line Easement “

“Design grading and location of other UDF-related features, including stormwater management system components and vehicle access areas along the easement, have not been completed. These features and grading conditions will be provided in the **Final Design Plan**”.

Page 7. 2.7. Leachate management

“The design of the leachate collection system has not been completed as part of the conceptual design. Therefore, this section contains limited detail regarding leachate management, with a more detailed design to be provided in the **Final Design Plan**”.

Management system components and vehicle access areas along the easement, have not been completed. These features and grading conditions will be provided in the **Final Design Plan**.

Page 8 2.9 UDF operational and support Areas

“The design aspects of the UDF operational and support areas have not been completed as part of the conceptual design. Therefore, those aspects are discussed in only a limited way in this Conceptual Design Plan and will be described in detail in the **Final Design Plan**”.

Page 9. 3.2 Perimeter Berm and Baseline System

“This description of the perimeter berm and baseliner system is conceptual and subject to revision based

on the collection and evaluation of additional data (notably the additional groundwater elevation data) collected during the remainder of the PDI, as well as **additional design work**".

Page 12. 3.3.5.1. Leachate Collection System Design

"This section provides some information regarding the leachate collection system. However, the design of the leachate collection system has not been completed, and a more detailed design will be included in the **Final Design Plan**".

Page 13. 3.4. Site Excavation

"A mass earthwork analysis was performed as part of this Conceptual Design Plan. This analysis was inclusive of the perimeter berm and peripheral (conceptual) grading shown on Design Drawing 3. The analysis did not include the road/pipe corridor to the north, the UDF operational area located in the southeastern portion of the GE Parcel, or the stormwater basins shown on Design Drawing 3. Earthwork computations for these areas will be developed based on more advanced designs and the results provided in the **Final Design Plan**".

Page 16. 4.2.5. Disposal Capacity

"At the time of submittal of this Conceptual Design Plan, site groundwater elevation data are still being collected. Consequently, the **final floor elevation of the UDF has yet to be determined**".

4.3 Subsurface Drainage System Design

"The design of the subsurface drainage system has not been completed as part of the conceptual design. This section, therefore, contains only limited information regarding that system. A more detailed design will be provided in the **Final Design Plan**".

Page 19. 5.2 Disposal Material Management and Placement

"As of the date of this Conceptual Design Plan, methods for transporting dredged or excavated material to the UDF for disposal are still being evaluated but will include trucking or conveyance via slurry within a temporary pipe to the UDF. The methods and procedures for transport of material to the UDF will be described in GE's On- Site Transportation and Disposal Plan. The methods for managing and placing that material within the UDF are dependent on the means of delivery of the material from the remedial areas. The material will be placed in a manner that maximizes the capacity of the UDF and minimizes impacts to the community and environment. The disposal of such material at the UDF will be discussed further in the **Final Design Plan**".

Page 20 5.4. UDF Support Facilities

"It is anticipated that UDF support facilities will be constructed to provide access to the UDF perimeter berm, parking for personnel, staging for inbound/outbound materials and equipment, and a location for a leachate storage and treatment facility. More details regarding those support facilities, including their locations within the GE Parcel, will be provided in the **Final Design Plan**".

5.6 Air Monitoring

"Development of the baseline air monitoring program to be operated prior to use of the UDF and design of the air monitoring program to be implemented during construction and operation of the UDF have not been completed as part of the conceptual design. Therefore, those air monitoring programs will be described in the **Final Design Plan** and/or the associated UDF OMM Plan".

5.7 Surface Water Monitoring

“Surface water monitoring during UDF operation will be dependent on the design of the stormwater management system, which is still being developed and will be presented in the **Final Design Plan** and/or UDF OMM Plan”.

Page 21 Measures to Address Habitat Impacts

“Given this situation as well as the fact that the design is only conceptual at this stage, the identification of habitat impacts has not been completed and will be evaluated further in the **Final Design Plan**”.

Page 22 UDF Closure

“The design of the UDF closure has not been completed as part of the conceptual design. As a result, this section provides only very limited information regarding UDF closure. The planned closure activities will be discussed further in **Final Design Plan**, with specific details to be presented in the Final Cover/Closure Plan for the UDF (described in Section 4.3.2.5 of the Final Revised SOW)”

Thanks you for allowing us to comment..

Timothy Gray HRI Judy Herkimer HEAL

.

.

February 13,2023

Please accept these comments on the GE

Upland Disposal Facility Conceptual Design Plan

GE-Pittsfield/Housatonic River Site

Submitted via email ((r1housatonic@epa.gov)

GE-Housatonic River Site Public Comments
EPA Region 1
5 Post Office Square (Mail Code SEMD-07-01) Boston, MA 02109-3912

The Housatonic Environmental Action League, Inc.
Raising Awareness – Sharing Knowledge – Bridging Advocates
Post Office Box 21, Cornwall Bridge, CT 06754-0021
and
The Housatonic River Initiative
Working for a fishable, swimmable river since 1992
165 Bradley Street, Lee, Ma, 01238

Page 1. Introduction

Page One States “In addition, “the GE Parcel will contain a UDF support area, which is currently undefined and not shown on the figure and which may include facilities such as sediment dewatering, water treatment, and/or loading areas”.

This statement is as vague as the EPA’s new project manager’s presentation at the recent Citizen Coordinating Committee meeting. He admitted several times to not being read up on the reports we were asking about. This report has the same recurring theme. **Very little information!**

Please note that we have identified each Paragraph that contains the phrase “FINAL DESIGN PLAN” to bring attention to how much information is missing from the Conceptual Design Plan and which EPA will have to rely on the Final Design Plan.

Page 2. Design Report Organization

“Note that some of the UDF components or UDF-related activities covered by the above-listed sections cannot be described in any detail at this time and **must await completion of the UDF design. These components and activities are identified as such in a number of sections of this Conceptual Design Plan and will be described in the Final Design Plan for the UDF.** The design information presented herein reflects the state of design as of the date of this Conceptual Design Plan and will be expanded upon in the Final Design Plan and/or the associated UDF OMM Plan”.

Page 3.

Mostly old general information we already have discussed.

Page 4 Pre Design Investigation

“Those activities include, among others, a baseline habitat assessment, a topographic and bathymetric field survey, a soil geotechnical evaluation, engineering and environmental soil testing, piezometer and monitoring well installation, groundwater elevation and quality testing, and a cultural resource assessment (CRA). These activities are briefly summarized below. The PDI is ongoing as of the date of this Conceptual Design Plan and is scheduled to be **completed in late 2023, after which all the data collected during the PDI will be presented in a Final Pre-Design Investigation Summary Report for the Upland Disposal Facility Area**”.

Page 21 “Given this situation as well as the fact that the design is only conceptual at this stage, the identification of habitat impacts has not been completed and will be evaluated further in the Final Design Plan”.

Page 6 2.3.7. Ground Water Quality Monitoring

“results from the monitoring in the remainder of 2022 and in 2023 will be presented in the Final UDF PDI Summary Report. The baseline groundwater chemical quality conditions will be used in developing a

groundwater monitoring plan that will be implemented during construction and operation of the UDF and during the UDF final cover/closure period. Further description of the UDF groundwater monitoring plan will be provided in the UDF **Final Design**".

2.4 Overhead Electrical Utility Line Easement “

“Design grading and location of other UDF-related features, including stormwater management system components and vehicle access areas along the easement, have not been completed. These features and grading conditions will be provided in the **Final Design Plan**".

Page 7. 2.7. Leachate management

“The design of the leachate collection system has not been completed as part of the conceptual design. Therefore, this section contains limited detail regarding leachate management, with a more detailed design to be provided in the **Final Design Plan**".

Management system components and vehicle access areas along the easement, have not been completed. These features and grading conditions will be provided in the **Final Design Plan**.

Page 8 2.9 UDF operational and support Areas

“The design aspects of the UDF operational and support areas have not been completed as part of the conceptual design. Therefore, those aspects are discussed in only a limited way in this Conceptual Design Plan and will be described in detail in the **Final Design Plan**".

Page 9. 3.2 Perimeter Berm and Baseline System

“This description of the perimeter berm and baseliner system is conceptual and subject to revision based on the collection and evaluation of additional data (notably the additional groundwater elevation data) collected during the remainder of the PDI, as well as **additional design work**".

Page 12. 3.3.5.1. Leachate Collection System Design

“This section provides some information regarding the leachate collection system. However, the design of the leachate collection system has not been completed, and a more detailed design will be included in the **Final Design Plan**".

Page 13. 3.4. Site Excavation

“A mass earthwork analysis was performed as part of this Conceptual Design Plan. This analysis was inclusive of the perimeter berm and peripheral (conceptual) grading shown on Design Drawing 3. The analysis did not include the road/pipe corridor to the north, the UDF operational area located in the southeastern portion of the GE Parcel, or the stormwater basins shown on Design Drawing 3. Earthwork computations for these areas will be developed based on more advanced designs and the results provided in the **Final Design Plan**".

Page 16. 4.2.5. Disposal Capacity

“At the time of submittal of this Conceptual Design Plan, site groundwater elevation data are still being collected. Consequently, the **final floor elevation of the UDF has yet to be determined**".

4.3 Subsurface Drainage System Design

“The design of the subsurface drainage system has not been completed as part of the conceptual design. This section, therefore, contains only limited information regarding that system. A more detailed design will be provided in the **Final Design Plan**”.

Page 19. 5.2 Disposal Material Management and Placement

“As of the date of this Conceptual Design Plan, methods for transporting dredged or excavated material to the UDF for disposal are still being evaluated but will include trucking or conveyance via slurry within a temporary pipe to the UDF. The methods and procedures for transport of material to the UDF will be described in GE’s On- Site Transportation and Disposal Plan. The methods for managing and placing that material within the UDF are dependent on the means of delivery of the material from the remedial areas. The material will be placed in a manner that maximizes the capacity of the UDF and minimizes impacts to the community and environment. The disposal of such material at the UDF will be discussed further in the **Final Design Plan**”.

Page 20 5.4. UDF Support Facilities

“It is anticipated that UDF support facilities will be constructed to provide access to the UDF perimeter berm, parking for personnel, staging for inbound/outbound materials and equipment, and a location for a leachate storage and treatment facility. More details regarding those support facilities, including their locations within the GE Parcel, will be provided in the **Final Design Plan**”

5.6 Air Monitoring

“Development of the baseline air monitoring program to be operated prior to use of the UDF and design of the air monitoring program to be implemented during construction and operation of the UDF have not been completed as part of the conceptual design. Therefore, those air monitoring programs will be described in the **Final Design Plan** and/or the associated UDF OMM Plan”.

5.7 Surface Water Monitoring

“Surface water monitoring during UDF operation will be dependent on the design of the stormwater management system, which is still being developed and will be presented in the **Final Design Plan** and/or UDF OMM Plan”.

Page 21 Measures to Address Habitat Impacts

“Given this situation as well as the fact that the design is only conceptual at this stage, the identification of habitat impacts has not been completed and will be evaluated further in the **Final Design Plan**”.

Page 22 UDF Closure

“The design of the UDF closure has not been completed as part of the conceptual design. As a result, this section provides only very limited information regarding UDF closure. The planned closure activities will be discussed further in **Final Design Plan**, with specific details to be presented in the Final Cover/Closure Plan for the UDF (described in Section 4.3.2.5 of the Final Revised SOW)”

Thanks you for allowing us to comment..

Timothy Gray HRI Judy Herkimer HEAL

From: [Darren Blaney](#)
To: [R1Housatonic](#)
Subject: No Toxic PCB Dump in Lee!
Date: Monday, February 13, 2023 12:15:02 PM

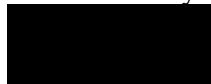
To Whom It May Concern,

I am a citizen of Lee, MA, and I ask you to rescind the EPA's decision to put a toxic PCB dump in the Town of Lee. The proposed site is dangerously close to the water supply. After attending multiple town meetings about this issue, I'm convinced that this proposed "upland disposal facility" will pose health and financial problems for the citizens of Lee that would cause them irreparable harm.

Most obviously, the proposed liner will eventually leak. This will cause toxic pollution to enter the water table in our town, and will contaminate the ground and possibly the water supply. In addition, the dredging and cleanup process will take 10 years to complete. During this time, toxic PCB dust will be present in our town as dump trucks move the sediment from Woods Pond to the proposed dump site.

The proposed plan will be terrible for the health of the 6,000 people who live in Lee, and result in decreased property values as well. Please do NOT allow this project to harm our citizens!

Sincerely,
Darren Blaney



Sent from Darren via technology invented on planet Earth

From: [Joshua Bloom](#)
To: [R1Housatonic](#)
Subject: Response to Upland Disposal Facility Conceptual Design Plan
Date: Tuesday, February 7, 2023 10:58:13 AM

Dear EPA representatives,

The EPA has widely questioned some of its agency's decisions and actions under the previous Presidential administration. In October 2021 Michael Regan said: "Manipulating, suppressing, or otherwise impeding science has real-world consequences for human health and the environment...When politics drives science rather than science informing policy, we are more likely to make policy choices that sacrifice the health of the most vulnerable among us."

With regards to the proposed Upland Disposal Facility that GE wants to construct in Lee Massachusetts, this is yet another example of a hasty decision in the interest of a major corporation that has real world consequences on the environment and health and safety of the surrounding populations. The EPA has disregarded every plea from the residents of Lee. It refused to participate in public forums organized by the town Select Board, it refused to participate in Lee Board of Health proceedings. It has disregarded the referendum and votes taken by the Lee townspeople. It has not sided with the townspeople's challenges in court.

It is time for the EPA to fully recognize that politics drove science rather than science informing policy in the decision to place the PCB dump in Lee. The result of the EPA's bad policy choices here will sacrifice the health of the most vulnerable among us unless you act not to reconsider the plans entirely to place a disposal site near the population of Lee and Lenox, MA.

After reviewing ARCADIS' December 2022 Report "General Electric Company Upland Disposal Facility Conceptual Design Plan GE-Pittsfield/Housatonic River Site", I have the following comments, questions or concerns:

- **COMMENT/CONCERN:** The UDF maximum design capacity of 1.3 million cubic yards (cy), a maximum footprint of 20 acres, and a maximum elevation of 1,099 feet above mean sea level (amsl) is enormous and is too great to be near residential areas, businesses, the Montessori School of the Berkshires, and water.
 - **QUESTION:** Can you require GE to go back to the original plans that proposed hauling all the dredged materials out of the Berkshires by train?
- **COMMENT/CONCERN:** The Lee Board of Health proceedings and Select Board forums on the plans for the disposal facility made it clear to those in attendance that GE's plans for the two bottom liners (aka baseliner) pose a serious risk of leakage and risk to the environment and the health of the population near the site.
 - **QUESTION:** Why has the EPA not been willing to engage in public forums convened by the town government?

- **QUESTION:** Why have you been dismissive of the concerns about the baseliner?
- **COMMENT/CONCERN:** There are similar concerns from local health and environmental experts in Berkshire County and beyond about not just the baseliner, but also about the permeability of the cap.
 - **QUESTION:** What are the environmental and public health concerns relating to the cap?
- **COMMENT/CONCERN:** Environmentalist, conservationists, and health professionals have raised concerns to the population of Lee about surface runoff, surface erosion, and stormwater contribution to leachate generation given the nature of the ground makeup at the site and proximity to water.
 - **QUESTION:** Will you consider a new site, further away from any populated area and especially not one already affected by these PCB pollutants, instead of the Berkshires?
- **COMMENT/CONCERN:** I am alarmed by some of health and environmental risks outlined in the chart “Applicable or Relevant and Appropriate Requirements for Upland Disposal Facility Upland Disposal Facility Conceptual Design Plan.” The chart reviews cancer slope factors for PCBs, reference doses, Carcinogenic Risk Assessment (Framework and guidelines for assessing potential cancer risks from exposure to pollutants and other environmental agents), Supplemental Guidance for Assessing Susceptibility from Early- Life Exposure to Carcinogens (Guidance on issues relating to assessing cancer risks associated with early-life exposures, including an adjustment for carcinogens acting through a mutagenic mode of action.)
 - **QUESTION:** Can you inform the local population what are the potential health impacts of the EPA allowing GE to put a PCB disposal facility in Lee?
- **COMMENT/CONCERN:** The report talked about taking steps to minimize but not eliminate the “potential adverse impacts of the discharge on the wetland, stream, and/or pool”.
 - **QUESTION:** What more can and will the EPA do to better ensure that Lee and Lenox’s wetlands, streams, and pools are protected?
- **QUESTION:** Why are the notification requirements and thresholds in the Massachusetts Contingency Plan not applicable to disposal at the UDF? Can the EPA hold GE to these standards?
- **COMMENT/CONCERN:** The report says that “there would be no practicable alternative that would be less damaging to resource areas” than GE’s UDF-related earthwork or other activities to remove, dredge, fill, or alter resource areas, including the wetland in the east-central portion of the GE Parcel, the associated stream and/or vernal pool, and/or the southeastern- most gravel-pit ponded area. The most obvious alternative is to find another safer site!
 - **QUESTION:** Will you stop the hazardous plans for the Upland Disposal Facility and find another disposal site away from the towns affected by GE’s

poisoning the Housatonic River with PCBs?

- **COMMENT/CONCERN:** It is troubling that the following details have not yet been made public:
 - The design of the subsurface drainage system and calculations documenting the drainage layer design. Why is this not ready at this stage yet?
 - The methods for transporting dredged or excavated material to the UDF for disposal. The report said trucking or conveyance via slurry within a temporary pipe to the UDF was under consideration. Trucking should be ruled out in favor of the pipe or train.
 - Baseline air monitoring program was not completed yet and should be completed before moving on to the Final Design Plan. The public should be involved in the air monitoring plans.
 - The potential impacts on the habitat of threatened or endangered species, notably the northern long-eared bat, and potential measures to address such impacts.
 - QUESTION: Can you require this information to be made public before any further work is done on the Upland Disposal Facility?

Sincerely,
Joshua Bloom

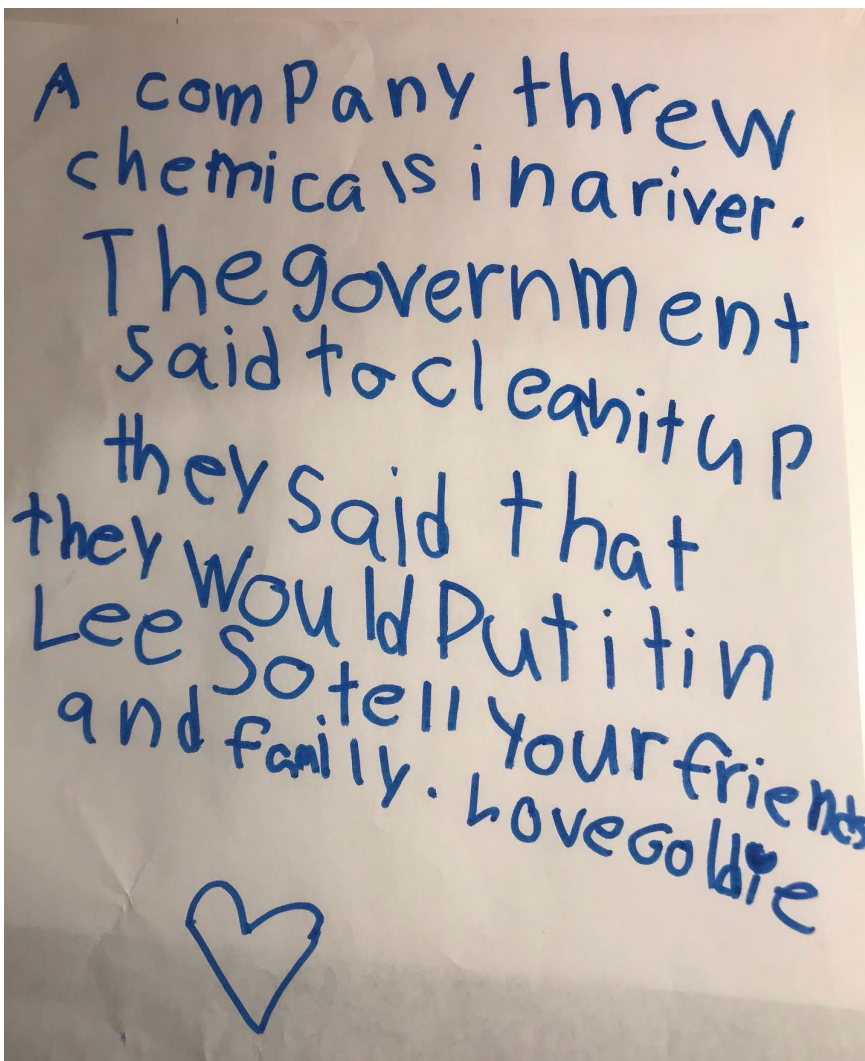
[REDACTED]
[REDACTED]

From: [Joshua Bloom](#)
To: [R1Housatonic](#)
Subject: from my 6-year-old daughter Goldie
Date: Friday, February 10, 2023 8:08:00 AM

Dear EPA representatives,

While driving my 6-year-old daughter Goldie home from school yesterday, we talked about what we did that day; among the things I told her about was that I had written to you about GE's plans to construct a PCB dump in our town of Lee (the Upland Disposal Facility).

I explained to her in terms that she could understand how the river became polluted and the plans for remediation and disposal of dredged materials. She was so concerned that she independently wrote the attached note to give out to her teacher, classmates, and you.



Please do not put Goldie's future at risk. Do not jeopardize her health and welfare. Please do not allow GE to destroy our town's environment.

Sincerely,

Joshua Bloom
on behalf of Goldie Gordon-Bloom (age 6, 1st grade)



From: [redacted]
To: [redacted]
Subject: [redacted]
Date: [redacted]

Dear EPA representatives,

Yesterday, I sent you a letter that my 6-year-old daughter Goldie asked me to send to you.

Goldie's 6-year-old sister Lola asked if she could write a letter to you as well. Unlike her sister, Lola did not ask for spelling assistance so hopefully you understand her phonetic spelling.

Hi my name is Lola,
I am 8 years old and I live
in Lee and some of my
friends do too. Please!
Please! do not dump
the chemicals in Lee
because my dad said it
could cause cancer and
I do not want cancer
and neither do my friends
could please dump the chemicals
away from Civell's Ashok!

Love,
Lola

Please protect Lee's environment and its residents' health by halting plans to put a PCB dump in our community.

Sincerely,
Joshua Bloom
On behalf of Lola Gordon-Bloom (age 8, 3rd grade)

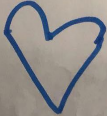
Sent from my iPhone

On Feb 10, 2023, at 8:07 AM, Joshua Bloom <[redacted]> wrote:

>
> Dear EPA representatives,

> While driving my 6-year-old daughter Goldie home from school yesterday, we talked about what we did that day; among the things I told her about was that I had written to you about GE's plans to construct a PCB dump in our town of Lee (the Upland Disposal Facility).

I explained to her in terms that she could understand how the river became polluted and the plans for remediation and disposal of dredged materials. She was so concerned that she independently wrote the attached note to give out to her teacher, classmates, and you.

A company threw
chemicals in a river.
The government
said to clean it up
they said that
they would put it in
Lee So tell your friends
and family. Love Goldie


Please do not put Goldie's future at risk. Do not jeopardize her health and welfare. Please do not allow GE to destroy our town's environment.

Sincerely,

Jackie Brown

on behalf of Goldie Gordon-Brown (age 6, 1st grade)

[Redacted]

From: [Janice Braim](#)
To: [R1Housatonic](#)
Subject: No dump
Date: Saturday, February 4, 2023 4:02:06 PM

Dear EPA, you really need to stop this dump! There are other ways to clean up the river without harming the residence of the town of Lee! It's common sense that this plastic bag is going to leak at some point, also the dump trucks going through the town for the next 13 years with PCB's on them, it's going to harm everyone. Plus, you are reeking the most beautiful part of Lee, October mountain. GE did this to our town, they should clean it up right! They're not even cleaning up the river all the way anyway. Tell them to do the right thing and clean it up right without a dump.

Janice Braim Sent from my iPhone

TO: R1Housatonic@epa.gov

From Gail Ceresia

[REDACTED]

[REDACTED]

Date 2-13-2023

RE: Comments on docs...

671716 Upland Disposal Facility Conceptual Design Plan &
30150026 Interim Pre-Design Investigation Data Summary Report for Upland Disposal Facility Area (PDF)

671716 Section 1 Introduction & 2.9 UDF operational and Support Area & 3.3.4 Settlement Area

1)The UDF support area is undefined and may include facilities such as sediment dewatering, water treatment and/or loading areas. Information on these operations is not included. How can changes be made, and impacts to the environment and public health be known, or commented on if this information will only be included in the final report? Demonstration of protection to the ACEC Habitat and Public Health are not provided.

2) To date there are no PCB compatibles liners warranted by any companies. How can EPA guarantee the liners will not fail?

3) **Table 2-1 pages 1through 9:** where EPA claims no alternative exists based on the grounds that the risk to public health is greater to human health and the environment without the dump.

Please explain why EPA does not send the PCB laden soil out of state to a Tasca certified site? This is a practical alternative. Another practical alternative is to investigate alternative technologies to permanently breakdown or render PCB's neutral. All avenues have not been explored. Why does GE have permission to pollute more land, an aquifer, remove the PCB laden soil beyond Woods Pond Dam which serves as a check dam, and jeopardize the Town of Lee water supply by airborne PCB laden silts and clay particles (dust) generated during and after construction. How is public health protected when the UDF is located approximately 1 mile from the center of Lee?

4) Please provide current Biologist Report with the name of the Wildlife Species Identified on GE Site and surrounding areas.

Document 671716 Interim Pre-Design Investigation Data Summary Report for Upland Disposal Facility Area section 3.1 **Baseline Habitat Assessment** last paragraph states that **"No federally listed or state listed rare wildlife species occurrences have been identified or recorded on the**

GE Parcel, and the MNHESP has confirmed by email that no records of state-listed species occurrences have been recorded on the GE Parcel.” I looked for the signed biologist report to see the list of species identified but could not find it. Ample documentation concerning what chemicals are or are not present in the ground water monitoring wells appears to have been provided, but a list of all wildlife species observed on or near the GE land has not been provided.

The Eversource ROW have been under land alteration since 2017 without environmental review by the Lee Conservation Commission or DEP even though these lands fall within a designated Area of Environmental Concern (ACEC). The Eversource ROW has been stripped of vegetation and filled with trap rocks, a 2-acre parcel west of the GE land and slightly north of the dump has been stripped of vegetation and filled (even though I and other Lee residents know the back portion (west) and land near the north boundary would be designated BVW had they not been filled). Eurovia land north and east of the parcel were altered and stripped of vegetation. The Lee Conservation Commission and DEP has not taken any action because EPA has told the state of Massachusetts and Lee Conservation that this area is under their jurisdiction and have been informed to stay away from the GE property and surrounding lands. Since EPA is in charge, environmental intervention has not taken place. This is particularly concerning because the current baseline study has been compromised, due to land alteration prior to the baseline habitat study.

When the Lee Agricultural Commission was able to have an onsite visit in September, biologists were collecting data in a station located north and downgradient of the UDF site, near the Eversource ROW (and that is not owned by GE). Were additional endangered species such as Wood Turtles, (*Glyptemys insculpta*) observed within the ROW? Why did Mr. Richard Fischer tell me not to speak to the biologist and give us a difficult time about viewing the wetland areas north of the proposed dump?

5) How is the Woodlot 2002 habitat and vegetation coverage different than the new study? please provide the document location and in what way is the data different to the study conducted to date.

6) According to EPA Document [semsub.epa.gov/work/01/593922.pdf](https://www.epa.gov/work/01/593922.pdf) (463 pp, 3.06MB) EPA’s response dated 10-1-2016 (pgs. 249-252), EPA was against placement of a dump outside the flood plain in the Berkshires.

7) In 2016 Consent Decree, EPA stated that the soil characteristics of the GE property did not meet site criteria for a Tasca dump. Please tell the public what has changed?

From: [Clare Lahey](#)
To: [R1Housatonic](#)
Cc: [Dumville, Kelsey](#); [REDACTED]
Subject: Fwd: Delivery Status Notification (Delay)
Date: Monday, February 13, 2023 5:08:40 PM
Attachments: [icon.png](#)
[mime-attachment](#)
[mime-attachment.eml.msg](#)

Please see delay notice received when Joanna Fribush tried to send comments for UDF docs with deadline today (2/13/23).
She was sending to

R1Housatonic@epa.com

as directed on the EPA website

-----Original Message-----

From: Joanna Fribush [REDACTED]
To: Bunnie Lahey [REDACTED]
Sent: Sun, Feb 12, 2023 9:39 pm
Subject: Fwd: Delivery Status Notification (Delay)

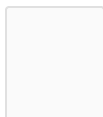
Hi

I'm forwarding this msg about my letter to EPA, do you have correct address.
This is second time I've gotten this notice.
Sure hope Ed continues on his getting better routine, speak to you soon
J

Sent from my iPad

Begin forwarded message:

From: Mail Delivery Subsystem <mailer-daemon@googlemail.com>
Date: February 12, 2023 at 2:36:45 PM EST
To: [REDACTED]
Subject: Delivery Status Notification (Delay)



Delivery incomplete

There was a temporary problem delivering your message to **R1Housatonic@epa.com**. Gmail will retry for 20 more hours. You'll be notified if the delivery fails permanently.

[LEARN MORE](#)

The response was:

The recipient server did not accept our requests to connect. Learn more at <https://support.google.com/mail/answer/7720> [epa.com 35.186.238.101: timed out]

I am opposed to the EPA's plan to allow deposits of river sediment containing toxic substances to the Lee site near residential area and water sources. Depositing 1.3 million cubic yards containing a great amount of harmful material will involve extensive tree cutting and harming wetlands.

The EPA should protect, not destroy this beautiful area.

Joanna Fribush



Sent from my iPad

From: [DENNIS FIELD](#)
To: [R1Housatonic](#)
Subject: Housatonic River cleanup
Date: Monday, February 13, 2023 8:23:00 PM

To Whom It May Concern:

I am writing to voice my opposition to the establishment of a toxic PCB waste dump in the town of Lee, MA. This dump will be located right next to the river that is to be cleaned. It will also be built near ground water, only 15 feet minimum depth. It is to be lined with plastic. Has a liner been found yet that guarantees no leakage when holding toxic chemicals? Forever? The dump will be located in a residential area. Property valuations will fall and health effects to residents in the area will be a concern. Does any of this sound like an intelligent solution to the remediation of the Housatonic? Clearly, the only benefit goes to GE, the polluter.

Debra Kelly



From: [Clare Lahey](#)
To: [R1Housatonic](#); R1Housatonic@epa.com
Subject: Comments on UPLAND DISPOSAL FACILITY (UDF) CONCEPTUAL DESIGN PLAN & Interim PDI Data Summary Report for UDF
Date: Monday, February 13, 2023 10:56:18 PM

Dear Sirs:

Please accept our comments on the Housatonic River UDF plans

We are quite concerned about the safety of the UDF that will be located a short distance from our home. We are downgrade from the dump and concerned about toxic chemicals from the dump traveling via the groundwater **or air** to our homesite at the corner of Washington Mountain Road & Mill Street.

We have worried for many years about the PCBs in the river just across the road from our home. Our household has had several cases of cancer, including 2 bladder cancers, lung cancer, and now the head of our household, 84 years old, is suffering from COPD. We **understand** that **these diseases** could be related to the nearby **toxic** PCBs flowing by our home for many years. The chance that our family could be exposed to more toxic chemicals via a nearby PCB dump is frightening.

We have read and studied both the UDF Conceptual Design Plan and the Interim PDI Data Summary Report for the UDF. It's difficult to know that these plans will provide us with the protections we need. **We are not convinced that GE's plans will prevent a structural failure, which we believe was** Region 1 EPA's original concern with the appropriateness of this site.

There does not seem to be sufficient **space** on the GE 75-acre parcel to host both the consolidated dump and the preparatory operations of dewatering, access roads, water treatment, and the hydraulic pumping station.

Here are a few more of our concerns:

- We know from federal toxicology reports that PCBs are a known health hazard, especially for child-bearing mothers, children, and the elderly. The health risk of a nearby dump, even if it does not leak or fail, is not yet known. We cannot take the chance that we would be risking the health of even one individual, not even for the "greater good," by placing a dump near residential areas.
- The UDF will be located within 1/2 mile of a low/middle income neighborhood on Chrystal Street in the neighboring town of Lenox. This unique little township of Lenoxdale meets most of the requirements for an environmental justice community.
- The UDF would be located less than 1 mile from our home. We are downgrade from the dump, a perfect target for groundwater flow.

- It would seem that there's a great risk of structural failure due to the erosion prone sand/gravel base.
- Because of our rapidly-changing climate patterns, predictions cannot be made with any reliability as to weather related events (stormwater runoff, floods, winds).
- Because of our rapidly-changing climate patterns, predictions cannot be made with any reliability as to weather related events (stormwater runoff, floods, winds). We should not be subject to the dangers of such uncertainty. Structural strength of the dump and support facilities will be subject to the whims of nature
- Structural strength of the dump and support facilities will be subject to the whims of nature.
- It appears that the Clean Waters Act will have to be waived to make way for this project, destroying this vital wetland and vernal pool, the only breeding area for the vast wooded uplands across Woodland Road. As mentioned in the reports, there are no other vernal pools within a mile of this one on GE property. The sandy soils needed for turtle nesting are also unique to this Area of Critical Environmental Concern.
- Before receiving EPA approval, GE needs to show us that their 75-acre site has room to host both the dump and all the preparatory operations. They should not be allowed to expand this site by purchasing adjoining property, which would further devalue nearby neighborhoods.
- The extensive system of culverts, berms, holding ponds, etc. planned to control erosion will surely infringe upon the natural beauty of this treasured scenic area.
- Before EPA approval, GE needs to show us that their proposed hydrological pumping plan is feasible. They promised that this would reduce the number of truck trips. This was an important factor in winning their EAB appeal.
- There are feasible alternatives to this local dump that would not require violating every applicable local, state, and federal environmental law. These laws were passed to protect our health and natural environment, not to benefit a corporation that has poisoned our river and plans to rub salt in the wound by contaminating our land.

Please consider our comments as you review the GE proposed plans.

Clare & Ed Lahey

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [R1Housatonic](#)
Subject: PCB UDF Lee MA comment
Date: Monday, February 13, 2023 5:02:42 PM

Hi,

My name is Anne Langlais. I am not only a long-time resident, I am also a homeowner and business owner of more than 20 years.

As there was a vast amount *insufficient information* provided in this document, I will do my best to comment on the proposed PCB UDF design set for Lee, Massachusetts, in The Beautiful Berkshires.

Most of this document is general information and knowledge, repeated from past documents.

Many times through this document is repeated, [Estimated](#) slope, [Estimated](#) elevation, [Estimated](#) habitat, [Estimated](#) material properties, [Estimated](#) net volume, [Estimated](#) storm flow, [Estimated](#) Bed rock offset.

There doesn't seem to be much concrete for certain information, or numbers. I also see throughout the entire document, these repeated phrases below...

- 1.) " elevation data are still being collected."
- 2.) " which is currently undefined and not shown."
- 3.) "and will be expanded upon in the Final Design Plan."
- 4.) "will be presented in a Final Pre-Design Investigation Summary Report."
- 5.) " will be presented in the Final UDF PDI Summary Report."
- 6.) " have/has not been completed."
- 7.) " designs and the results provided in the Final Design Plan."
- 8.) "components and activities are identified as such in a number of sections of this Conceptual Design Plan and will be described in the final Design Plan for the UDF"

This site was originally passed over by you, the EPA as it was deemed **NOT SUITABLE** in the original agreement. Can you explain to me how it is now, what has changed at this location?

This proposed site is in a residential neighborhood with many day care centers and several schools all within a 2-mile radius. The time frame of 13 to 15 years of trucks transporting this carcinogens material, airborne through our neighborhoods, putting people's health at risk is NOT acceptable. The polycarbonate biphenyls need to be properly remediated and removed by rail to a preexisting superfund site.

The means at which you reached Your human risk assessment is shameful and downright inhumane!!! Shame on all of you !!!

You, the EPA states how you were going to look into alternative technologies, and you have NOT ! There are so many newer technologies out here today that can be implemented to the poison that General Electric should be held accountable for unleashing into the public. It was supposed to be your job, the EPA to protect us from

harm... the EPA has allowed this big corporate monster to continue to poison and kill residents with their cancer-causing PCBs that they released into our community years ago.

You, the EPA to this day have NOT ADDRESSED the Kimberly Clark Dump that's leaking near that area currently, in residents' yards. Its been leaking dioxane and Naphthalene for way too long. Many people have already lost loved family members to cancer, and now their beloved pets too. You aren't able to hold Kimber Clark, (Sweitzer) accountable, we certainly DON'T trust that you will or can hold General Electric accountable either !

the EPA is now becoming now as the Environmental Poison Agency. The EPA has NO integrity, we want you and need you to hold those at fault accountable to the people.

There is a family Dairy farm less than 1/2 mile from that proposed UDF site. They have been there for generations. For generations of working hard to invest for their families' futures. You the EPA knows Dam Well how the milk from those cows can contain PBCs through the grain and corn-fed animals. Just like it did in Lenox dale some years ago and was caught in the milk in Connecticut!!!!!! This particular family of dairy Farmers has graciously granted access of their personal property of the reservoir on their land, for the towns people of Lee. Instead of being appreciated and thanked, You the EPA are shoving a BIG OI" - F\$#@ YOU down their throats!!!

The EPA came in SUPPORTING General Electric's divide and conquer tactics of getting the individual towns pitted against one another, along with creating divisiveness within towns people of Lee. The EPA full knowing, ALLOWED General Electric to prey upon a poor neighborhood, with residents who have no knowledge about the poisonous cancer-causing effects of Polychlorinated biphenyls.

The Current EPA is Disgraceful !!!!!

Anne Langlais

From: [CINDY MATHIAS](#)
To: [R1Housatonic](#)
Subject: Comment period on GE upland dump facility in LEE MA 2/13/23
Date: Monday, February 13, 2023 10:20:39 AM

I would like my comments to go into the official record and get a personal response.

The EPA is notorious for being a revolving door for corporate lobbyists. The polluting corporation in question always has a leg up, which in this case is General Electric. The EPA and GE have numerous failures in cleanups, unsatisfactory plans that can't be executed properly and litigation lawsuits leaving a bigger mess than when they started the project, one example, The Hudson River.

The EPA estimated the GE cleanup of the Housatonic River in 2016 to be 600 million, that would easily be 900 million in 2023. So GE is getting a bargain for only a 400 million dollar partial inadequate cleanup.

GE only has to clean up a small portion of the Housatonic River and within that small portion only 20-30 percent will actually get cleaned.

GE wants to destroy the town of Lee with a toxic PCB dump scarring the landscape forever ruining the gateway to the Berkshires. The people of Lee have spoken and voted against a dump in town. The citizens of Lee want the EPA to treat the PCBs properly with new technologies that break down PCBs, not dredge and dump.

The proposed toxic PCB dump will be 20 football fields at the base of October Mountain which is the largest state forest in Massachusetts. It will be placed only 150 feet above the river. The proximity of the dump to the river is reason enough for not putting a dump at that location.

The geology report states the soil is permeable and not stable and can't possibly hold toxic PCBs, which will end up back in the river, negating the whole cleanup effort.

The EPA and GE have not taken into account extreme climate change, storm surges, floods, hurricanes and possible tornados that would be detrimental in the release of the PCBs from the dump. The liner that is proposed must be compatible with toxic PCBs. There is no manufacturer that will warranty the use of any liner for PCBs. The liner will fail and PCBs will leak back into the river, that is the only thing guaranteed to happen.

One of the biggest health hazards of this cleanup is the use of unregulated dump trucks hauling toxic PCBs dredged from the river crossing through Berkshire county. PCBs are 100% more volatile when they are airborne. Not only will the dump trucks leak and leave a trail of PCBs on the roads but the amount of diesel fumes that will be released into the atmosphere over a 15 year period will become a huge health hazard. There is NO assurance for the safety of the dump trucks as they travel through the Berkshires, past our homes, schools, restaurants, workplace.

What happens when the inevitable accident of an over turned leaking truck occurs?

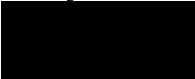
There are so many things left to chance and unanswered. In the EPAs statement of basis in 2016 they write that "there is potential for PCB releases to the Housatonic watershed if the landfills are not properly operated, monitored and maintained."

These are all reasons why a toxic PCB dump should never become a reality!

There are numerous books and documentaries made over the years about GE and their

horrendous track record of poisoning land, waterways, humans and animals.
Why should we trust GE to do a proper cleanup now?

Cindy Mathias



From: [Nancy McLaughlin](#)
To: [R1Housatonic](#)
Subject: Comments on the UDF proposed in Lee, MA
Date: Monday, February 13, 2023 10:11:20 AM

February 12, 2023



R1Housatonic@epa.gov

Dear EPA Representatives:

RE: Comments on the Upland Disposal Facility proposed in Lee, MA to hold the PCB contamination soil caused by GE's discharge of PCBs into the Housatonic River

GE discharged toxic PCBs from its Pittsfield, MA facility into the Housatonic River from 1932 to 1977. Despite indications as early as the late 1930's that exposure was causing health problems in workers, GE continued to use and discharge PCBs until the chemical was federally banned in 1977. In addition to being a "probable" cause of cancer, PCBs last for decades or longer in the environment. Exposure increases risks of certain health conditions, such as heart disease, diabetes, thyroid disease, female genital disease and non-hodgkins lymphoma. Exposure in pregnant women can affect birth weight, infant motor skills and the ability to learn. In addition to being exposed through contact with skin and through eating contaminated foods, exposure can come from inhalation of evaporated PCBs in the air. The more exposure and measurable traces in a person's blood, the higher your risk. It follows that the closer you are to airborne PCB exposure, the more risk you will have. Protecting the public from this toxic substance is critical. The road to cleaning up the toxic PCBs in the Housatonic River has been a long journey.

The planned Upland Disposal Facility is designed to hold contaminated soil removed from the Housatonic River and "contained" in a landfill site for PCBs considered lower level concentrations of the chemical. This differs from the original plan to transport all of the contaminated soil out of state to a licensed PCB disposal site. GE objected that that plan because they felt it was too large a plan, more destructive than previously rejected remedies and ultimately too expensive.

The choice of Lee, MA for this facility is questionable for several reasons. In earlier stages of this process, the site was ruled out as being geologically unsuitable because of the type of soil at the site.

In reading the current EPA document, there seems are many areas where the data or the treatment of various concerns are not determined yet or shared in the report. Why is the report proceeding without all pertinent information? Baseline air monitoring is not completed yet. This is necessary and needs to be transparent to the public. I am not a scientist or an engineer. But it seems that you don't need to be an expert to see some glaring issues with the location of the Upland Disposal Facility.

How can such a facility be located on top of an aquifer? The plan to have two plastic liners to prevent leakage, is insufficient. No liners exist which guarantee to contain PCBs. So it appears to be a matter of time before leaking occurs. Which will undoubtedly pose a risk to drinking water in Lee and possibly Lenox. Even if the Lee municipal water supply is not affected, there are many older homes in town that have well water. How long will it take to notice that these private wells are sickening residents? Will residents with well water have to test their own water, or will EPA/GE be responsible?

The UDF is located adjacent to October Mountain State Forest, the largest state forest in Massachusetts. This forest is supposed to provide a protected area for wildlife and plant life as well as recreational use for citizens. How safe will it be for hikers and others enjoying the beauty of the forest?

The UDF site is not remotely located. It is too close to areas of private homes as well as industrial locations where people work. Public roads are nearby. This is a huge concern for airborne exposure to PCBs during the cleanup and transportation of contaminated materials.

Power lines are located directly outside of the boundaries of the UDF. From the maps that are included in the report, it appears much too close for utility workers who may have maintenance work or repairs to do on the power lines.

It is reported that contaminated soils will be transported to the UDF by truck. Air born exposure during loading and transport are a worry as well as possible dropping of wet contaminated soil on roadways, Who will clean up spillage on our roads? Is truck transportation still the current plan? We find it unacceptable to have a daily parade of trucks filled with waste traveling on our roads. The railroad is adjacent to the river in many locations and the citizens feel this is a safer method and will cause the least disruption of daily

life of the residents.

The discharges by GE occurred in Pittsfield, MA for decades. Why does Lee, MA suffer the consequence of being the location chosen to receive the poisoned material? Why does GE have influence on the cost and plan chosen? The original plan was to transport all the contaminated materials to an out of state facility that accepts PCB contaminated materials.

The citizens of Lee strongly urge the EPA to rescind its devastating decision to build a toxic dump in Lee. Ultimately, a safer disposal site is needed.

Sincerely,

Nancy A. McLaughlin

From: [Paul J Mercier Jr](#)
To: [R1Housatonic](#)
Subject: Proposed GE Toxic Waste Dump in Lee, Massachusetts
Date: Thursday, February 9, 2023 8:18:57 AM

To the Committee Responsible for Considering Approval of this Project:

I grew up in Lenox Dale (just across the river from this proposed project site) and feel very passionate about protecting the community that gave me so much. From my perspective, the area will always be “Home”. While I do not currently reside there, our family still owns property in Lenox Dale and thus is directly affected by this project and the decisions made regarding it.

Aside from the material health risks that this project in this location would unquestionably raise for the people currently living there, EPA should consider the long-term economic destruction, which approval of this project would impose. Looking at the Housatonic valley as a cohesive unit, one can see that the little village of Lenox Dale could become a vibrant center of activity, all in concert with the surrounding Berkshire Hills. Undeniably, there are many long range opportunities for sustainable environmental practices as well as economic opportunities for the area that would be lost by the proximity of a hazardous waste facility such as the one proposed. I might also add that according to the proposal submitted to EPA, many questions regarding the design and operation of the facility remain unclear and are simply addressed by “will be addressed in the future”. This is truly unacceptable when considering the integrity of any corporation whose only mission is economic enrichment.

I therefore implore the Environment Protection Agency to rescind any decision (political or otherwise) to allow General Electric to build a toxic PCB dump in Lee in the heart of the Berkshires. It’s the right thing to do!

Sincerely,

Paul J Mercier Jr.

CONFIDENTIALITY NOTICE: This message, including any

attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender and destroy all copies of the original message.

Paul J. Mercier, Jr. CPA *(Retired)*
The Mercier Group, pc



From: [Kathy Naventi-Brown](#)
To: [R1Housatonic](#)
Subject: Lee, MA
Date: Monday, February 13, 2023 1:57:16 PM

Good afternoon,

Please consider newer, safer alternatives to the existing remediation plan for the Housatonic River clean up in my town. First of all, any digging or dredging will release PCB toxins in the air. Secondly, to even consider building any kind of a waste facility within an aquifer is foolhardy. Systems fail, and this solution is fraught with future dangers. Thirdly, Massachusetts lays claim to some of the finest educational institutions in the world. I find it very hard to believe that, if solicited and sought out by the EPA, better approaches couldn't be found or developed within the same time frame associated with the current plan, which would eliminate the risks to the town of Lee, its residents and the other towns in Berkshire County.

GE certainly needs to be held accountable for their actions, but the current plan is not the way to go.

Have we learned nothing from other areas where similar remediation has taken place and failed?

Sincerely,

Kathy Naventi-Brown



Sent from my iPad

From: [Sage Radachowsky](#)
To: [R1Housatonic](#)
Subject: The People DO NOT WANT THE DUMP!
Date: Monday, February 13, 2023 7:07:11 AM

It is clear the people DO NOT WANT THE DUMP and the EPA has been ignoring this. This has been a FARCE of a process, engineered to force through this "solution". The breaking of Open Meeting Laws was blatant. The AG's complicity was obvious. The EPA should be ashamed. All those involved should be ashamed. The dump will be a disaster and people will FIGHT it physically. It will be a long-term disaster and it will leak.

Sage Radachowsky

From: [Laurence Re](#)
To: [R1Housatonic](#)
Subject: Proposed PCB dump site in Lee, MA
Date: Monday, February 13, 2023 12:07:24 PM

To Whom This May Concern,

I'm writing to request that the Environment Protection Agency rescind its decision to allow General Electric to build a toxic PCB dump ("Upland Disposal Facility") in Lee, MA, in the heart of the Berkshires.

Please help us to find a better solution to the problem.

Thank you!

Laurence Re



From: [Judd Reiss](#)
To: [R1Housatonic](#)
Subject: Town of Lee, MA; Rest of River Cleanup/Toxic PCB Dump
Date: Monday, February 13, 2023 8:47:50 PM

Hello-

I thought I'd chime in on this, as a resident of Lee, MA. I don't expect to move the needle on current decisions. I hope only to add another drop of dissent to the conversation.

I'm completely unconvinced that the proposed plan is in the best interests of local residents. It may be in the best interests of GE.

I don't wish to disparage the MA EPA employees. Most are probably conscientiously seeking to do their best for the residents of the state. But there are also most likely some who are looking forward to their next job, with the industries they were hired to possibly protect us from. Such betrayal has long been discussed on a national level, and is not surprising.

There are also local organizations, committees, etc. who are or have been in a position to negotiate on behalf of residents. I thank them for doing what must be a thankless task. I've read a number of their comments over time, and I can see there is much sincerity in their suggestions. Some have really struggled to come up with what they think is in our collective best interests. But their desire find the best solution doesn't mean their suggestions are the best.

I simply can't see how burying PCBs locally, in close proximity to water, animal, and human habitat makes any sense. I don't believe that a large, capped landfill will stand the test of time. There's just too many variables to consider.

Sincerely,
Judd Reiss

From: [Monica Ryan](#)
To: [R1Housatonic](#)
Subject: Town of Lee UDF proposal for the Housatonic River
Date: Monday, February 13, 2023 4:38:39 PM

Dear EPA and GE,

I am 100% opposed to the placement of the dump anywhere near the aquifer that feeds our water supply. Our water supply is spring fed, and that water is pushed up from the lower area and ultimately sourced from the large aquifer that is located below the proposed site for the UDF.

I don't even see who the project can proceed because you have not even selected a material that is able to hold the toxic materials. There is no liner material on earth as of today that has any sort of guarantee that it will not fail. With a failed liner as a possibility, you also have no plan to remediate anything that may leech from the UDF. Your plan is only to "monitor" it. What good does that do when the damage would already be done?

We can't fix the aquifer if you allow it to be contaminated. We would be stuck with contaminated water. AND, you would knowingly do this? If you could prevent an environmental disaster, why wouldn't you do the utmost to prevent it instead of allowing the corporation to roll over us?

Question for EPA: What suddenly made you feel that this site is now appropriate for a dump, when in 2016 you were opposed to having one there? The soil conditions are still the same; the liner issue has not gotten any better. I want to know exactly what changed your mind from your earlier arguments against this placement of the UDF. You are supposed to protect the Environment, so DO YOUR JOB, and stop making it easy for the corporations to destroy it...and destroy it AGAIN. I WANT ANSWERS!

Question for GE: Do you have no shame? You know that thousands of people (and pets) in and around the Berkshires have died from cancer since the 70's due to GE's poor management of the facilities. I'm taking about the workers who made your profits lo these many years. And now to top it off, to their children and their grand-children, and for many generations, you will leave a legacy of more cancer? How do you even sleep at night?

I am beyond disgusted at the fact that you just don't care, both the EPA and GE did not even deign to attend our Board of Health Hearing. Were you too scared to face the music?

If you proceed with this dangerous UDF, we will do everything that it takes to oppose this. This is not over, not by a long shot.

Sincerely,

Monica Ryan

[REDACTED]
[REDACTED]
[REDACTED]

P.S. My Great, Great-Grandfather was the Commissioner of Aquifers for the State of New York for decades and was responsible for the Croton Reservoir and Dam, and he would be rolling over in his grave to hear how little you think of the safety of our water.

From: [Suzanne Salinetti](#)
To: [R1Housatonic](#)
Subject: Objection to the Proposed Plan
Date: Monday, February 13, 2023 12:50:46 PM

To the

Environmental Protection Agency

I am wholeheartedly and completely opposed to the plan as it was planned and proposed behind our backs and behind closed doors in February of 2020. Not enough is known, but enough **is** known about the long-term effects of PCB's either airborne or in water. Not enough is known, but it is known that clean ups are not feasible, retention pools are not reliable. This plan and decision was made in haste without consideration by any of the innocent people that will be affected by this debacle of a plan.

When you realize you've condemned **our** innocent families to deal with fifteen years of openly transported PCB's, burying them in **our** bucolic town in which many have lived their entire lives (myself included) subjecting us to illness and potential untimely death, it will be too late. Too late for you to consider that you should've done better and **could have done** better.

EPA, there are mountains of evidence to show you are and were wrong and careless, hasty and undereducated in pushing this decision and agreement that you forced upon **our** town without our knowledge or consent.

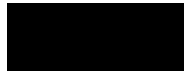
There are many other and better solutions to this, and I for one, have one. Please listen to us and stop this most unhealthy process. NOW!

Please listen to us. Listen to the science. **Our** families' livelihoods are at stake.

Not yours.

Ours.

Suzanne Salinetti



From: [REDACTED]
To: R1Housatonic
Subject: Berkshire PCB dump
Date: Sunday, February 12, 2023 3:35:30 PM

To Whom It May Concern at the EPA,

We are residents of the Town of Lee, MA writing to express our concerns about the proposed Upland Disposal Facility. As more information has come to light, the potential risks to public health and the environment are seriously disturbing. The location above the October Mountain Aquifer and the 47,000 or so truck trips through Berkshire towns are especially alarming. Proven gross negligence is already a major part of this PCB problem from the onset. Distinctly possible leakage, human error, more irresponsible decisions and unpredictable climate factors changing conditions all add up to more negligence if we do not try previously tested bioremediation and alternative technologies in Berkshire County. To our knowledge, it is the EPA and Massachusetts DEP that are unwilling to authorize the trials. If newer methods are more effective and less destructive to our ecosystem, we have a responsibility to each other and our common home to consider them first. Please re-evaluate that decision and authorize these trials before proceeding with dredging, trucking & dumping.

Sincerely,

James and Christine Schwarz

[REDACTED]

From: [Verena Smith](#)
To: [R1Housatonic](#)
Subject: Housatonic River, Lee MA
Date: Monday, February 13, 2023 7:40:38 PM

To Whom It May Concern:

My name is Verena Smith and my family and I live on Walker Street in Lenox. We moved here a few years ago after living in different parts of the country and Berkshire County. We feel that we have found our forever home here in Lenoxdale. My son (12) goes to school in Lenox, I work in Lenox and my husband works in Great Barrington. Since we know about the EPA's plan to create the PCB dump in Lee, I am terrified as to what this means for our family. The idea of thousands of truckloads of contaminated materials possibly driving by our front door for years to come is absolutely devastating. To think and worry about airborne PCBs everytime we step outside to walk our dogs, play in our yard or just go about our lives is beyond scary. I am concerned about this exposure to PCBs for my son, who has his whole life ahead of him. I don't want him to get cancer in 15 years when he will think about starting a family. This is a life changing situation for all of us and I BEG you to please consider the people who live here. Treat don't dump!
Thank you for reading my comment.
Verena Smith

From: [Steve Turner](#)
To: [R1Housatonic](#)
Subject: PCB landfill
Date: Saturday, February 11, 2023 10:19:14 AM

Good morning,

We are writing in opposition of a proposed PCB landfill in Lee. MA.

It does not make sense to us that the poison General Electric dumped into the Housatonic River will be removed from this riverbed and deposited in a landfill above a pond and riverbed from which they are being removed.

We are not scientists, but we learned in grade school that gravity rules and water eventually seeks its own level.

We are not lawyers, corporate executives or shareholders trying to protect financial interests.

We are parents, grandparents and future great-grandparents who are trying to protect our offspring.

Thank you for considering this plea.

Respectfully,

Sue and Steve Turner



From: [Tiffany Wilding-White](#)
To: [R1Housatonic](#)
Subject: Reconsider Lee MA dump site
Date: Thursday, February 9, 2023 9:56:31 PM

We write to implore you to reconsider the decision to allow toxic PCBs to be dumped in our town of Lee, MA. The EPA is supposed to protect the environment, not corporate interests, (in this case GE). The health of our townspeople is at risk, which the EPA is disregarding, despite our town people voting and taking legal action. Please!

—
Tiffany Wilding-White, M.S.
