

Public Input on General Electric's December 20, 2023
Quality of Life Compliance Plan

April 2024



CITY OF PITTSFIELD

DEPARTMENT OF COMMUNITY DEVELOPMENT, CITY HALL, 70 ALLEN STREET, RM 205
PITTSFIELD, MA 01201

MEMORANDUM

To: Dean Tagliaferro, EPA Project Manager Housatonic Site
Chris Smith, EPA
From: James McGrath, Park, Open Space, and Natural Resource Program Manager
Date: April 1, 2024
Subject: *Comments on GE-Pittsfield/Housatonic River Site Quality of Life Compliance Plan*

The City of Pittsfield appreciates the opportunity to provide initial comments on components of the Quality of Life (QOL) Compliance Plan being considered in Reach 5A as part of the Rest of River (ROR) clean up. The QOL Compliance Plan is a site-wide plan that defines the standards and measures that will be applied throughout the clean-up area.

The purpose of the Plan is to describe how the following topics will be addressed during the remediation activities for Reaches 5 through 8, and our comments will address each topic area specifically for Reach 5A:

- Coordination with local governments;
- Potential air quality, noise, odor and lighting impacts through the establishment and implementation of QOL standards governing those impacts;
- Measures to address potential impacts on recreational activities;
- Road use, including restrictions on transportation of waste material on certain designated roads and methods to mitigate transportation-related impacts to certain neighborhoods, infrastructure, and the general public; and
- Community health and safety, including coordination with affected residents and landowners.

Overall, we note that there are numerous statements throughout the document that infer that information that will be provided in other documents (such as the Final RD/RA Work Plan, etc). The QOL Plan is a valuable community document and it should therefore be presented in a stand-alone format as a singular resource where a community member can find all the details of interest related to QOL parameters. We would ask that the Plan be revised to capture all necessary details describing QOL Compliance Plan components. Generally, though, we find that

the standards and parameters of the various QOL components (air quality, odor, light, noise, etc.) are acceptable.

The Plan states the “coordination with local governments and affected residents/landowners at or near areas impacted by remediation” will occur, though it is mentioned only briefly. It should be acknowledged that coordination with residents/landowners is likely to be a continuous and potentially evolving requirement in the ROR remedial action efforts. Continuous interaction with the adjacent property owners may be a suitable component to the noted “community liaison” responsibilities to help address an owner’s concerns. It is important that close coordination between the on-site remedial project manager and property owner is maintained. We would ask that GE describe how they will continue to maintain open and transparent communication with residents/landowners to ensure the ultimate remedial action achieves the landowner’s expectations.

The Plan focuses on parameters of air quality, noise, odor and lighting. There are additional parameters of interest and concern to the community that GE may be able to address, including aesthetics (visible impacts) to the natural environment. Disturbance to the Housatonic River from the remedial action activities are likely to cause visible effects to water quality in the form of turbidity, color and sheen. In addition, the riverbank soils and upland soils remedial actions will remove terrestrial vegetation. These visible impacts can be disturbing to surrounding neighbors; therefore, it is important for GE to acknowledge these impacts and provide the community assurance of the overall improvements to be achieved by the remedial action. It is recommended that GE allow the community to express and/or record observations of aesthetic concerns as part of the QOL community coordination public input process so that GE can begin to plan how significant disturbances will be addressed.

The Plan indicates that GE will work cooperatively with the City to facilitate the enhancement of recreational activities, such as canoeing and other water activities. The City has identified Exposure Area 27 as an area where recreational use may be increased in the future with the placement of a boat launch area. As such, we ask that the floodplain soils be addressed using “Frequently Used Subarea” methods in order to account for possible future uses. We look forward to working with GE to assist in achieving a potential future reuse of this city-owned parcel for potential recreational boating access.

Section 7 of the QOL Compliance Plan describes the approach for community coordination, specifically around health and safety. GE proposed to identify a single community liaison as part of their community outreach. The City recommends that the first task for the community liaison is to seek out representatives from each residential area in Pittsfield to form a Reach 5A community group. Additionally, the City would ask that this position also establish a community safety watch group that includes community safety leaders (Pittsfield Police/Fire and Berkshire Medical Center) who will be linked into the communications network in order to be aware of patterns of traffic, and other possible concerns (spills, etc.) in order to be better prepared for any potential emergency.

Finally, the QOL Plan provides a good basis for monitoring and response to exceedance of protective standards. However, there is no mention if the QOL parameters analysis and interpretation will be reviewed by outside, regulatory oversight resources such as EPA. It seems important to have occasional external review to ensure a high quality assurance and quality control to the gathered monitoring data.

We appreciate the opportunity to provide comments on important quality of life matters in Reach 5A. We look forward to further collaboration on implementation of the noted parameters to lessen the possibility of negative impacts to our neighborhoods and community.

Sincerely,

A handwritten signature in black ink, appearing to read "J. McGrath". The signature is fluid and cursive, with a large initial "J" and a stylized "McGrath".

James McGrath, CPRP
Park, Open Space, and Natural Resource Program Manager

Stephen C. Bannon, Chair
Leigh Davis, Vice Chair
Eric Gabriel
Garfield C. Reed
Benjamin Elliott



Town Hall, 334 Main Street
Great Barrington, MA 01230

Telephone: (413) 528-1619 x2900
Fax: (413) 528-2290

TOWN OF GREAT BARRINGTON MASSACHUSETTS

SELECTBOARD

March 25, 2024

Comments emailed to: RIHousatonic@epa.gov

Re: GE-Pittsfield/Housatonic River Site: Quality of Life Compliance Plan, December 2023

Dear EPA:

The Town of Great Barrington Selectboard has reviewed the above referenced Quality of Life Compliance Plan and offers the following comments:

1. As a general comment, while this plan is a site-wide plan, and more detailed plans will be developed for each remediation unit to address the specific approach for the remediation at that location, EPA's attention to this plan is critical because it will be a framework for those future plans. This plan is an important opportunity to identify and plan for the broad scope of quality of life impacts that may arise from the Rest of River (ROR) remediation.
2. The plan should include a requirement to identify, assess, and address visual impacts. The current draft plan focuses on parameters of air quality, noise, odor, and lighting. There are additional parameters of interest and concern to the community, including aesthetic (visible) impacts to the natural environment, such as trees, riverbanks, and river features. In Great Barrington, for example, the western banks of Rising Pond are particularly beautiful. Therefore we look forward to reviewing GE's specific plans to avoid widespread aesthetic impacts to the banks, riverside forests, and bald eagle nests, during the remediation of Rising Pond.
3. The plan should include a description of how GE will continue to maintain open and transparent communication with residents/landowners to ensure the ultimate remedial action achieves the landowner's expectations.
4. The plan should include an assessment of specific air quality, odor, noise, or light events, in addition to the averaging approach described. The process of averaging dilutes the result from a single event giving a false impression that these events are not harmful. For instance, a single burst of noise can yield harm, and should therefore be acknowledged. Furthermore, analysis of event-specific noise results would help determine time periods (and associated activities) that yield the most problematic conditions. This isolation of the data would assist GE in amending their work activities with this event-specific data, and thus avoid practices that are disturbing events, as well as those practices that could cause harm and stress over time.
5. The plan's air quality monitoring program should be as robust as possible, and should include sampling of dust for total PCB analysis, as well as the sampling of particulate matter. The plan should also ensure that EPA and/or other independent agencies monitor the data for accuracy and precision.

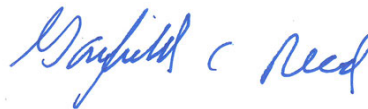
6. We appreciate that the plan indicates that GE will work cooperatively with each ROR municipality and with the state to facilitate the enhancement of recreational activities, such as river access for canoeing and other water activities, prior to completion of remediation in each work area. This plan, or those future discussions, should also include, where necessary, the plans for accessibility across/over existing barriers like railroad tracks or steep slopes in order to safely access the river recreation points.
7. The plan should be required to be amended to accommodate any lessons learned as each remediation work area is undertaken and accomplished, in keeping with the Adaptive Management approach required by the EPA. Finally, the plan should recognize that what is "quality of life" to one community at one point in time may in fact change over the long life of this remediation process, as community composition and attitudes evolve, and that the plan may need to be updated over the long life of the ROR remediation.

Thank you for the opportunity to comment on the proposed Quality of Life Compliance Plan. And thank you for providing Technical Assistance Services for Communities (TASC) to the Rest of River municipalities.

Sincerely,
The Great Barrington Selectboard



Stephen C. Bannon



Garfield C. Reed



Leigh Davis



Benjamin Elliot



Eric Gabriel



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

R. Christopher Brittain,
Town Administrator

February 26, 2024

Mr. Dean Tagliaferro
EPA New England
10 Lyman Street, Suite 2
Pittsfield, MA 01201

Dear Mr. Tagliaferro,

The following is a list of comments from the Town of Lee regarding the Quality of Life Plan.

1. GE's Quality of Life Compliance Plan (QOL) was based heavily on truck transport and failed to adequately consider the possibility of using rail transportation for the 13 years of remediation.

The Town of Lee requests that the plan be resubmitted to reflect potential benefits of rail transportation.

2. GE's QOL Plan fails to discuss the impact this 13-year remediation project will have on tourism and business in general in our towns.

The Town requests that Section 7 also include affected businesses and tourism impacts.

3. The QOL Plan only takes into consideration recreational activities in the river (boating and fishing) and immediately on the banks of the river (walking and biking trails), but fails to address the impact of municipal parks and playgrounds located along the river or the bike path proposed in Lee from West Park Street to Route 102. Also, the Lee Athletic field immediately adjacent to the river has plans for expansion which should be addressed in the plan. In addition, GE's commitment to "facilitate [Pittsfield and the towns] future enhancement of recreational activities—such as canoeing and other water activities, hiking, and biking on trails—in the ROR corridor, on properties subject to remediation, and/or at locations of temporary access roads and staging areas" lacks any specificity or financial commitments. At a time when trails along the river are being expanded, it is important to know if GE bears any financial responsibility toward those projects or towards park and playground enhancements.

The Town requests that the QOL Plan address if GE bears any financial responsibility toward expansion projects of parks and playgrounds.

4. The QOL Compliance Plan focuses on parameters of air quality, noise, odor and lighting. There are additional parameters of interest and concern to the community that GE may be able to address, including aesthetics (visible impacts) to the natural environment. Disturbance to the Housatonic River from the remedial action activities are likely to cause visible effects to water quality in the form of turbidity, color and sheen. In addition, occasional fish (and other forms of aquatic life) kills are likely to be visible. Also, the riverbank soils and upland soils remedial actions will remove terrestrial vegetation. These visible impacts can be disturbing to surrounding communities; therefore, it is important for GE to acknowledge these impacts and provide the community assurance of the overall improvements to be achieved by the remedial action. It is recommended that GE allow the community to express and/or record observations of aesthetic concerns as part of the QOL community coordination public input process so that GE can begin to plan how significant disturbances will be addressed.

The Town requests that the QOL Compliance Plan include a process whereby the community can report visible disturbances to GE so that significant disturbances can be addressed either by written/verbal responses or accommodated in the field.

5. A potential issue of QOL concern to communities may be the introduction of invasive species as a result of the physical disturbance created by construction. While the operation and maintenance requirements set forth in the Permit indicate that invasive species are to be addressed routinely as part of ongoing inspection and maintenance efforts, it may be appropriate for GE to describe this activity within the QOL Compliance Plan, to acknowledge this possible concern and to enlist community assistance in the process of identifying invasive species occurrence in both aquatic and terrestrial environments so that the invasive species can be addressed.

The Town requests that monitoring of invasive species should be a component to the QOL Compliance Plan.

6. Community health and safety is a priority of this QOL Compliance Plan. There are several additional safety considerations that could be addressed within this document. For instance, light disturbances are strictly evaluated from the perspective of being a nuisance to surrounding residents. It should be noted that powerful light sources can be distracting to motorists and cause traffic safety concerns. This same issue applies to construction noise. Sudden loud noises can cause traffic disturbance. This document should mention how intense lights and noises will be controlled to be sure traffic safety is addressed.

The Town requests that the QOL Compliance Plan be amended to include light and noise impacts to traffic safety. In addition, the Town requests that the plan be consistent with the Town of Lee's Noise Bylaws, Chapter 140.

7. Single event or low frequency of occurrence disturbances created by air quality, odor, noise and light are difficult to capture by monitoring when analysis results are averaged over time (*described in Section 4 beginning on pdf page 16*). The process of averaging

dilutes the result from a single event giving a false impression that these events are not harmful. For instance, a single burst of noise can yield harm, and should therefore be acknowledged. Furthermore, analysis of event-specific noise results would help determine time periods (and associated activities) that yield the most problematic conditions. This isolation of the data would assist GE in amending their work activities with this event-specific data. It would be appropriate to review the data to understand each event where a standard is exceeded (single data point in time and space) in addition to the time-weighted averaging proposed by GE.

The Town requests that monitoring data gathered for air quality, odor, noise and light could be evaluated by event (when a detectable level of the parameter is noted) in addition to the proposed time-weighted average approach presented by GE.

8. The QOL Compliance Plan relies on particulate matter (measured as particles smaller than 10 micrometers in diameter [PM10]) and PCB numerical standards for air quality monitoring (*Section 4.3.1.1, pdf page 18*). These are well-founded monitoring approaches to address air quality, but may miss certain releases. It may be suitable to amend the air quality monitoring with additional samples of dust, to be analyzed for total PCBs. The dust sample results could help determine if the designed air monitoring program is sufficient to capture all possible remedial action activity air concerns.

The Town requests that the air quality monitoring program could be amended to include sampling of dust for total PCB analysis.

9. The QOL Compliance Plan provides a good basis for monitoring and response to exceedance of protective standards. However, there is no mention if the QOL parameters analysis and interpretation will be reviewed by outside, regulatory oversight resources such as EPA. It seems important to have occasional external review to ensure a high quality assurance and quality control to the gathered monitoring data.

The community requests that outside agencies such as EPA, DEP and the TOWN OF LEE will review the QOL monitoring data for accuracy and precision.

10. *Section 4.3.1.2 Air Quality QOL Standard for PCBs*: Like the particulate standard, the QOL standard for PCBs includes both a Notification Level and an Action Level for total PCB concentrations. The Notification Level and Action Level for PCBs are the same as those previously approved by the EPA and used for prior Removal Actions at this Site. The Notification Level is 0.05 µg/m³ based on a 24-hour average, and the Action Level is 0.1 µg/m³ based on a 24-hour average. Table 4-2 summarizes the air quality QOL standard for PCBs.

The Town of Lee requests that the Notification Level be Reduced to 0.01 µg/m³.

GENERAL REMARKS

The Town would like to, once again, stress that the EPA consider the use of alternative treatment methods that would reduce the number of truck trips and overall capacity of the proposed UDF.

The Town of Lee, through its Select Board, would like to continue to express its overall discontent with the cleanup project as a whole. The Town, through numerous elections and public meetings, has objected to almost every aspect of the cleanup including but not limited to the toxic waste dump proposed for the Town of Lee, the lack of any alternative technologies for the cleanup remedy and the potential impact on our infrastructure and human health.

The Town of Lee played no part in the contamination of the river and considers this an environmental injustice that the residents of Lee be subject to 13 years of disruption and risk to human health, followed by centuries of potential issues from a toxic waste dump in our Town.

Sincerely,



R. Christopher Brittain,
Town Administrator

cc:

His Excellency Joseph Biden, President of the United States
The Honorable Edward Markey, U.S. Senate
The Honorable Elizabeth Warren, U.S. Senate
The Honorable Richard Neal, U.S. House of Representatives
Her Excellency Maura Healey, Governor of Massachusetts
The Honorable Andrea Joy Campbell, Attorney General of Massachusetts
The Honorable Paul Mark, State Senator
The Honorable William "Smitty" Pignatelli, State Representative, 3rd Berkshire
Select Board, Town of Lee



TOWN OF LENOX
6 Walker Street, Lenox, MA 01240
www.townoflenox.com

Christopher J. Ketchen, ICMA-CM
Town Manager

March 29, 2024

Mr. Dean Tagliaferro
EPA New England
10 Lyman Street, Suite 2
Pittsfield, MA 01201

[VIA EMAIL: R1Housatonic@epa.gov]

RE: Town of Lenox Comments – General Electric Quality of Life (QOL) Compliance Plan

Dear Mr. Tagliaferro:

The purpose of this letter is to convey comments and concerns of the Town of Lenox regarding the remediation of polychlorinated biphenyls (PCBs) in the Housatonic River. Lenox recognizes that, while the remedy selection process is over, implementing the Rest of River permit is ongoing. As such, it has the full focus and attention of the Town and we are eager to work with EPA Region 1 to maximize the safety, efficiency, and effectiveness of the cleanup throughout implementation.

Part of implementation is the approval of a quality of life compliance (QOL) plan, a proposal for which General Electric (GE) has submitted through their subcontractors (Anchor QEA, Arcadis) on December 20, 2023. Lenox has reviewed the GE proposal and accompanying data submitted. This letter constitutes the Town's response to the Environmental Protection Agency (EPA) as approved by the Lenox Select Board on March 27, 2024 in advance of the formal comment deadline on March 29, 2024.

GENERAL COMMENTS ON PRE-MATURITY OF THE COMPLIANCE PLAN

The most significant comment from Lenox regarding the QOL proposal is that it is substantially pre-mature due to EPA's rejection earlier this year of the GE/Arcadis Transportation and Disposal (T&D) Plan. Obviously, much of the QOL Plan is predicated on life as it will exist under an, as yet, unrevised T&D regime. Lenox has advocated in the strongest of terms for a departure from GE's truck-dependent proposal in favor of a plan that relies almost entirely on hydraulic and rail conveyance. Assuming EPA endorses the Lenox plan, revisions to QOL will be needed. Therefore, all comments below should be viewed through this expectant lens and, indeed, may be irrelevant in light of forthcoming changes.

Furthermore, Section II.L of the 2020 Settlement Agreement specifically requires the limitation of truck traffic in residential areas – a requirement that Lenox previously contends was not properly addressed in the GE/Arcadis T&D plan. It does not follow that these two plans (T&D and QOL) should be decoupled on this point. Lenox demands a subsequent comment period to address the substance of this QOL's next iteration, at which point adherence to the terms of the Settlement Agreement will be rigorously scrutinized by the Town.

Beyond the disjointed consideration of the QOL and T&D plans, there remain multiple instances where substantive details of plan execution are dependent on future information/decisions. In light of these information gaps, combined with the lack of specific language regarding various standards, Lenox has cause to be concerned. Whether it is the aforementioned T&D plan, the final Remedial Design/Remedial Action plan, or other relevant work plans, Lenox requests that the final QOL plan consider all such details and that development be in conjunction with – rather than separate from – these other plans.

COMMUNICATION UPDATES

Lenox has previously submitted comments regarding public communication. We are pleased to see some of our comments addressed in the Community Coordination and Health and Safety section of the QOL plan. Moving forward, Lenox's citizens want to be continuously informed and updated on the activities related to this clean-up effort. Region 1 has committed to establishing a website to provide daily updates on clean-up activities. We expect this website to be timely and adequately maintained. Lenox further requests that signage directing the public to the website be displayed prominently at areas of work.

For Lenox's part, we have directed our information professionals at the Lenox Library to develop a web-based information page to keep the public updated on the history and current events surrounding this project (link: <https://lenoxlib.org/local-history-resources/rest-of-river-cleanup/>). We hope the establishment of this resource page is viewed as a good-faith demonstration of Lenox's long-term commitment to sound problem-solving and communication. We will further expand this resource as the clean-up moves forward to address relevant work schedules and procedures to address those issues (foreseeable or otherwise) that inevitably occur. Lenox will also establish a single point of contact for clean-up-related activities. As the Town will have a single point of contact, we would request that EPA establish either a daily recorded message or hotline, available as a "1-800" phone number, for citizens to call for updates.

We ask that both EPA and GE draw upon their resources and knowledge of best practices to develop the most modern and informative communication plan available, including the incorporation of third-party monitoring/verification of key environmental indicators. This will necessarily include a mechanism for residents to report problems as they arise in real-time. Moreover, in other parts of the country, we observe greater real-time, online displays of statistical measures (dust, noise, other contaminants) via dedicated project websites (e.g. East Palestine, Ohio Train Derailment – Air Sampling Data dashboard). We request a reporting system that is just as robust – and preferably better – as part of this cleanup project.

OTHER NOTED DEFICIENCIES AND RELEVANT QOL PLAN COMMENTS

Beyond the broader discussion of conveyance and communication above, Lenox requests consideration of the following in the next iteration of the QOL plan:

- The QOL plan lacks specificity on the requirements for restoring municipal infrastructure damaged as a result of remediation work. Lenox expects that the QOL plan will be revised to conform to Section VI.A(3) of the Settlement Agreement, which specifies the

technological methods that are to be deployed in determining damage attributable to the work.

- Documentation of the pre-existing condition of municipal infrastructure – specifically the condition of roads, culverts, and bridges in the surrounding area – as well as documentation of the means and methods of repair are required to be part of the QOL plan. GE has not included said documentation in its December 2023 submittal. Rather, it has indicated in several statements throughout the submittal that documentation will be provided before work commences in a given area. This approach is not in keeping with the plain language set forth in the Settlement Agreement. As stated elsewhere in this letter, here again is an example of where the QOL plan should be developed in conjunction with other project plans – not developed separately.
- The work hours contemplated under Section 4.4 (Noise QOL Standards) do not conform to Lenox Town bylaws which prohibit work-related noise in residential zones between 8 p.m. – 7 a.m., Monday - Saturday. Furthermore, the inclusion of noise standards for work in the evening and overnight hours came as a surprise given the provisions of GE's T&D submission, which assumed a typical 8-hour workday with no work at all on weekends and holidays. This contradiction makes an additional case for considering other work plans in conjunction with the QOL plan.
- The ambient air standards proposed by GE appear to be Occupational Safety and Health Administration (OSHA) standards for workplace compliance. Lenox requests confirmation of this understanding and, if accurate, strongly advises a lower standard be established that is more appropriate for residential settings.
- To the greatest extent possible, Lenox requests that EPA require as much impartial, third-party data monitoring as possible to ensure the accuracy of reported quality-of-life indicators.
- In the future, to the extent that Lenox seeks to undertake its own data-monitoring plan for any aspect of the project, we expect that EPA will require GE to allow data-monitoring equipment and access on, along, or near the project site. Furthermore, under no circumstances should permission to install such equipment on GE property be unreasonably withheld.
- To the extent that Lenox requires detailed, proprietary information on equipment or improvements to real property for taxation purposes, GE must not withhold such information from the Lenox Board of Assessors.
- Given the importance of environmental stewardship as well as future recreational use of the river, the QOL plan must include greater emphasis on the elimination and prevention of invasive species introduction/proliferation along the project corridor.

- As pointed out by other commenters, light and noise considerations should be evaluated for their impact on traffic safety. The current QOL plan considers the impact to residents without considering roadway distractions and other potential safety impacts.

CONCLUSION

GE's QOL plan needs to be rewritten and improved to address the realities of a revised T&D Plan (which we have not seen yet). Furthermore, there are many enhancements and a higher standard for public communication currently lacking in the proposed plan, some of which are outlined above. We expect a revised plan that makes all the appropriate changes to ensure a successful project while reducing community impacts.

Thank you in advance for your consideration and we look forward to your favorable response.

Sincerely,



Christopher J. Ketchen, ICMA-CM
Town Manager

cc: The Honorable Edward Markey, U.S. Senate
The Honorable Elizabeth Warren, U.S. Senate
The Honorable Richard Neal, U.S. House of Representatives
Her Excellency Maura Healey, Governor of Massachusetts
The Honorable Paul Mark, State Senator
The Honorable Smitty Pignatelli, State Representative, 3rd Berkshire
Select Board members, Town of Lenox

Quality of Life Compliance Plan

My Comments Follow

Page 12:

“PCB monitoring will initially be performed in the vicinity of potential sources of PCB emissions for two sequential 24-hour periods (i.e., two back-to-back daily events) at the start of each new type of construction activity in each construction season to confirm that representative airborne concentrations for PCBs do not exceed the designated standards.”

Comments:

Airborne PCBs are a direct threat to thousands of residents and visitors each year. Two days of monitoring per year seems woefully inadequate to protect public health.

- The word “initially” is used in the first sentence. Does this suggest subsequent and ongoing monitoring of airborne PCBs will be mandated throughout each construction season? If so, what is the schedule?
- What is the definition of “each new type of construction activity”? This definition should be specified with detailed granularity.
- Such a short window will likely be weather-dependent, and the actual daily activity will likely impact the concentration of airborne PCBs.
- I respectfully suggest much more robust monitoring, and a plan to immediately address airborne PCBs and stop work if necessary to protect public health.
- I also request that a more detailed plan with respect to airborne health and safety risks be developed and distributed. It should include the safety and public health risks.
- The QoL Compliance Plan only requires notification by GE to EPA. It does not mandate notification to local Boards of Health, Town Managers, or Select Boards.
- Finally, I’d like to understand if GE will monitor the long-term health impacts. For example, EPA should require GE to monitor health outcomes over the entire duration of the project, such as cancer rates. We want to understand if the prevalence in the resident population is greater than general-population norms.

Pages 14 and subsequent: multiple sections

“GE may consider the following...”

Comments:

This is frankly a ridiculous promise with regard to particulate matter, airborne PCBs, noise complaints, and odor complaints. The word “may” is a choice, not a condition mandated by EPA. As an example, just now I just now may consider untying my shoes. I did not untie my shoes.

It is used as a qualifier before each and every laundry list of potential actions that could be taken to address the problem. The response to any situation where a maximum level is exceeded should be mandated.

If this is to be an actual Compliance Plan, and not just a promise to “consider,” EPA must mandate in the plan the actual steps to be taken based on likely scenarios that might occur. EPA has conducted hundreds of similar clean-ups before. EPA knows what can go wrong. List the likely points of concern and/or potential failures, and mandate what the responses should be. A promise to consider a response is totally inadequate.

Page 25: Improvements to land owned by governments, nonprofits, or private landowners and subsequent:

“Such discussions and any resulting agreements on recreational enhancements will need to occur at least six months prior to the scheduled completion of work in the associated portion of the remediation area to allow time for development of decommissioning plans by GE’s contractors in coordination with the local government’s or governmental landowner’s design and implementation schedule....”

Comments:

- What is the definition of the “associated portion of the remediation area”? Will this be based on major deadlines, such as completion of the work associated with each reach? Will there be deadlines associated with each property within a reach separately?
- How will GE notify affected parties of the deadlines in question? Do local governments and private parties need to monitor the work schedule, or will there be a process in place to give affected parties a reasonable amount of time to develop a proposal?
- Is there a mandated budget in the overall ROR agreement to go toward these improvements? How will proposals be evaluated, assuming there is a finite amount of grant money available?
- If there is a pre-defined budget how will GE ensure there is a fair distribution schedule for properties remediated on differing schedules?

Pages 27 and subsequent:

“Where such road reconditioning or upgrades include widening or expansion, this evaluation will consider the habitat/ecological impacts of the reconditioning or upgrades.”

Comments:

- How much wider will these rural roads need to be made to accommodate the clean-up?
- Will GE be mandated to seek approval from local Conservation Commissions and the Massachusetts Dept. of Environmental Protection to ensure that local and state wetlands protection laws are followed?
- Once again, the term “consider”. Does this imply that GE may consider, but not actually address, habitat/ecological impacts?

I would like to point out that the Route 7 area of Stockbridge and Lee contain Kampoosa Bog and Agawam Lake, the only two calcareous basin fens in the Commonwealth of Massachusetts. These are home to globally-rare species and in the case of Kampoosa, is a state-designated Area of Critical Environment Concern. GE must be mandated to do more than “consider” its environmental impacts on these critical and exceedingly rare habitats.

Pages 29 and 30: Damage to local infrastructure

“If the stress or damage is attributed to the ROR Remedial Action, GE will discuss with EPA and the affected local municipality, as appropriate, the appropriate steps for maintenance or repair. It is anticipated that, if the stress or damage is attributed to the ROR Remedial Action but is not considered a safety hazard for the public or remedial construction workers, the maintenance/repair will be postponed until after construction is complete. If appropriate, GE will discuss with EPA and the affected local municipality whether pavement preservation tactics should be utilized to extend the life of the pavement through completion of construction.”

Comments:

- Local highway departments are in a far better position than GE to ascertain whether the roads have been impacted. There should be mandated, regularly-scheduled meetings between GE and local governments to review damage to infrastructure.

- The plan once again uses hedging words, mandating only “discussion” and “appropriate steps”. How will the interests of local municipalities be protected. To put this in perspective, three of the five towns were only paid \$1.5 million each. Any impacts on our roads and bridges that are not repaired could easily impact these towns’ budgets by an order of magnitude above said compensation.
- GE’s decision to appeal the 2016 agreement suggests to me that the company’s top priority is to keep the costs of the remediation as low as possible. This plan does not provide enough protections or mandated repairs to protect these towns’ interests.

Respectfully submitted,

Patrick White/Stockbridge Select Board
www.patrickwhiteberkshires.com



March 29, 2024

Christopher Smith
EPA New England, Region I
Federal Facilities & Housatonic River Section
Superfund and Emergency Management Division
5 Post Office Square
Boston, MA 02109-3912

Via Email: R1Housatonic@epa.gov and smith.christopher@epa.gov

Re: **GE-Pittsfield/Housatonic River Site Rest of River (GECD850)**
Quality of Life Compliance Plan

Dear Mr. Smith:

On behalf of Mass Audubon, I submit the following comments on GE's Quality of Life Compliance (QOL) Plan (December 2023). As noted in our previous comments on this project, Mass Audubon is a directly affected landowner at our Canoe Meadows Wildlife Sanctuary in Reach 5A of the Rest of River area. Also, as a statewide conservation organization, we have a broader interest in the conservation and restoration of the Housatonic River Valley ecosystem for the benefit of people and wildlife.

As a landholding conservation organization, Mass Audubon frequently undertakes active ecological management projects involving tens to hundreds of acres, intended to support biodiversity and climate resilience/adaptation goals. These projects frequently receive public scrutiny, often from neighbors or other individuals concerned about change. As such, we have developed a communication strategy around significant projects, recognizing that providing different means and opportunities for the public to learn about project plans, ask questions, and express concerns results in stronger projects with better public support. GE's planning and implementation of the next phase of Rest of River remediation in the Housatonic region are orders of magnitude more complicated than Mass Audubon's typical ecological management work, but even so, a strong, transparent communication program should be a central facet of supporting quality of life measures for the communities affected by remediation activities.

In several instances, GE's proposed monitoring protocols rely on addressing and responding to complaints – a reactive approach – rather than continuous monitoring and proactive communication with community members. Increased transparency and broadly available data could reduce the number of individual complaints and help set community expectations. To this end, as previous Mass Audubon comments have suggested, GE should implement a public data portal, which could include information for a variety of metrics of concern, including air quality, noise, light, and other factors. Acknowledging that the QOL plan refers to a "project website" as a key

mechanism for sharing information with the public, a website will only be effective as a means of communication if it is dynamic and provides ongoing (ideally real time) data-sharing in a user-friendly interface. An example of such a project is being carried out by researchers at the MIT Media Lab's Responsive Environments Group. The [Tidmarsh Living Observatory \(mit.edu\)](http://tidmarsh.mit.edu) website demonstrates how sensors convey live video, audio, and other real-time sensor data (e.g. soil, UV) in a restored wetland at Mass Audubon's Tidmarsh Wildlife Sanctuary, in Plymouth, MA. This approach of continuous real time data sharing will also reduce the unnecessary lag times in communication from GE to EPA and then to municipalities and community members.

On-going monitoring and timely reporting are critical to ensure the health and safety of the community. The QOL plan proposes that the air quality monitoring be reduced to weekly once "initial PCB monitoring indicates that air PCB levels are acceptable" (p. 12). Similarly, noise monitoring should be reduced to monthly for each type of construction activity. Both air quality and noise levels should be monitored daily, if not continuously, in the vicinity of remediation activities for the duration of the project. The plan also proposes averaging within the 24-hour monitoring period, which, while effectively detecting chronic problems, dilutes measurements from a specific event occurrence that may also negatively impact the community.- Monitoring should flag all events that exceed notification thresholds, even if the exceedance is only a discrete event, for evaluation and response if appropriate.

The response to exceedance of notification and action levels is focused on steps that GE would take to respond to and correct the exceedance. However, the QOL plan lacks any description of how community members should respond in case of exceedance or how they would receive time-sensitive instruction to ensure their safety. The QOL plan should describe both the safety measures community members should take in the event of a parameter exceedance, and a method of communicating that such measures should be taken—perhaps a use of reverse 911, for example.

Lastly, as the owner of Canoe Meadows Wildlife Sanctuary, Mass Audubon is especially concerned with the safety of visitors to the sanctuary, including our Canoe Meadows community gardeners, school and camp groups and the general public. We want assurance that recreational activities at Canoe Meadows, including vegetable gardening, will continue to be safe for the duration of the project or be advised during or ahead of periods of time when recreational activities will need to be restricted for health and safety (e.g. air quality parameter exceedance). In addition to the signage described in the QOL plan (p. 24) when areas are restricted, GE should work with EPA and other stakeholders to develop and install interpretive panels at key recreation locations within the project area describing the Rest of River activities, where to find more information (project website) and how to sign up to receive notifications. This kind of on-the-ground signage is important for visitors to the area who may be unfamiliar with the Rest of River project.

Thank you for the opportunity to review this plan, and for your consideration of these comments.

Regards,



Stephen Hutchinson
Senior Regional Director
Mass Audubon



Citizens for PCB Removal (CPR) - Comments - Quality of Life Compliance Plan

Section 4.3.1 Development of Air Quality QOL Standards

Air quality standards from similar remediation projects were reviewed and considered for their applicability to the ROR project. The most applicable air quality standards are those used in prior remediation actions at the Site. The selected performance standards for air quality are the same as those established by EPA and used by GE for prior Removal Actions at this Site—including the Upper ½-Mile Reach Removal Action, the Removal Actions for floodplain properties, and the Removal Actions for Areas Outside the River—and also used by EPA for the 1½-Mile Reach Removal Action.

*CPR believes that the standards used over 20 years ago **should be re-evaluated** as scientific studies since the creation of the Consent Decree may have resulted in more stringent monitoring requirements.*

Section 4.3.1.2 Air Quality QOL Standard for PCBs

*CPR is unhappy to not see a **stoppage of work** should any of the monitoring events (4.3.3.1 Actions in Event of a Notification Level Exceedance, 4.3.3.2 Actions in Event of an Action Level Exceedance) exceed the monitoring levels and not start again until the situation is resolved.*

4.4 Noise QOL Standards

Table 4-3
Noise QOL Standards

Type	Numerical Standard (Maximum Hourly Average)
Residential Nighttime (9:00 p.m. to 7:00 a.m.)	65 dBA
Residential Daytime (7:00 a.m. to 9:00 p.m.)	80 dBA
Non-Residential (day or night)	80 dBA

*CPR believes that it is disingenuous to use such a high standard for Maximum Hourly **Average**, without setting an actual maximum dBA. Having dealt with GE and their ‘averaging’ of residential fill properties, there is no trust with what they may report. As example, if there is a time when the dBA level is recorded as 40 dBA does that mean that they can record an upper limit of 120 dBA?*

CPR is using the following websites in understanding 80 dBA:

<https://housegrail.com/how-loud-is-80-decibels/>

***From that website comes this quote:** Eighty-decibel sounds are intense and long-term exposure can damage your hearing. The maximum recommended sound limit for human exposure is 70 dB in 24 hours.*

Even though 80 dB is a harsh sound level, minimal exposure for a few minutes is not considered dangerous. Still, it is vital to note that 80 dB is 10 times louder than 70 dB (recommended maximum). Also, most people find 80 dB sounds too loud, irritating, or annoying.

Overexposure to a sound intensity of 80 dB can cause some level of hearing loss ranging from mild to severe. Two hours is the time-weighted average (TWA) for safe exposure to 80 decibels.

According to the Occupational Safety and Health Administration (OSHA) and the National Institute for Occupational Safety and Health (NIOSH), if sound intensity hits 85 dB, it is necessary to use hearing protection. Eighty decibels is pretty close to this limit, making it imperative to limit exposure to such sound levels or wear protective earplugs.

From this website: <https://decibelpro.app/blog/how-loud-is-80-decibels/>

Includes the following:

90 decibels is a high noise level, equivalent to the noise generated by a leaf blower or the sound level of a concert. Compared to 80 dB, 90 dB is 10 times more intense and twice as loud. Whenever you are exposed to this noise level, you should wear hearing protection.

If the initial monitoring indicates that noise levels are acceptable, subsequent monitoring will occur as follows: (1) monthly for each type of construction activity to verify noise levels; (2) when a new remediation activity, equipment, or reduced distance to receptors has the potential to increase noise levels; (3) if work hours are extended to the nighttime period (i.e., between 9:00 p.m. and 7:00 a.m.); and (4) in response to noise complaints. **Continuous monitoring will not be conducted as long as compliance with the standards has been demonstrated and there are no complaints from the public.**

CPR believes that continuous monitoring should be conducted.

Here are some additional graphs from a Google search:

<https://www.bing.com/images/search?q=dba+chart&qvpt=dba+chart&form=IGRE&first=1>

Because of these charts, CPR believes that the 80 dBA level was arbitrarily chosen without consideration of the actual noise levels that may be produced.

Every 10 dB increase in sound level doubles the perceived noise level. A sound level of 20dB is twice as loud as a sound level of 10dB and a sound level of 60dB is 4 times louder than a sound level of 50dB				dB Level	Examples	Permitted Exposure (Hours per Day)
Decibels (dB)	Examples	Home & Yard Appliances	Workshop & Construction			
0	Healthy Hearing Threshold			10	Breathing	
10	A Pin Dropping			20	Whisper	
15	Whistling inside ear running			30	Library	
20	Rustling Leaves			50	Quiet Office	
30	Whisper / Library			60	Conversational Speech, Electric shaver	
40	Babbling Brook	Computer		65	Piano Practice	
50	Light Traffic	Refrigerator/ Refrigerator		70	Noisy Restaurant	
58	Whistling Outside A/C Unit Running	Deledest Condensing Unit on the Market Today!		75	Alarm Clock	
60	Conversational Speech	Air Conditioner		80	Vacuum Cleaner	
70	Shower	Dishwasher		85	Garbage Disposal / Busy Hotel Lobby	
75	Toilet Flushing	Vacuum Cleaner		90	Tractor / Subway	8
80	Alarm Clock	Garbage Disposal		100	Blender, Factory Noise	2
85	Passing Diesel Truck	Snow Blower		105	Motorcycle, Orchestra	1
90	Squeeze Toy	Lawn Mower	Arc Welder	110	Power Saw, Heavy Truck, Power Mower	0.5
90-95	Level at Which Sustained Exposure May Result in Hearing Loss!			115	Uncomfortable Feeling Starts	0.25
95	Inside Subway Car	Food Processor	Soft Sander	120	Disco / Loud Bar Music / Shotgun	0
100	Motorcycle (idling)		Handheld Drill	130	Cymbal Crash, Air Raid Siren	0
105	Sporting Event		Table Saw	140	Rock Concert Front Row / Jet	0
110	Rock Band		Jackhammer	150	Chest begins to vibrate	0
115	Emergency Vehicle Siren		Welder	160	Eardrum bursts	0
120	Thunderclap		Oxygen Torch	190	Loudest Possible Sound	0
125	Balloon Popping					
130	Peak Stadium Crowd Noise					
135	Air Raid Siren					
140	Jet Engine at Takeoff					
145-150	Level at Which Sustained Exposure May Result in Hearing Loss! (Source: 2010 Hearing Protection Database 2010 Hearing Protection)					
150	Firecracker					
155	Fighter Jet Launch					
160	Cap Gun					
165	Shotgun					
170	357 Magnum Revolver					
175	Safety AirTag					
175	Howitzer Cannon					
180	Rocket Launch					
194	Sound Waves Become Shock Waves		Loudest Possible Sound			

6 Road Usage

CPR awaits the review of rail usage verses truck transportation.

Quality of Life?

*CPR believes that ultimate Quality of Life would be achieved by **removing all PCBs from the Housatonic River and its floodplains** and NOT having a landfill located in one of our Berkshire County towns. The removal of this toxic pollution should not stop at the Connecticut border but continue through to Long Island Sound.*

The entire river watershed should be cleaned at the full cost of its polluter General Electric!

Alternative Technologies MUST be included in Rest of River remedial actions.

Resident Protections

*While not specific to this GE submittal, residents and businesses along the Housatonic River should receive documented assurances that any future contamination found on their properties would be subject to cleanup by General Electric. This could include properties that were remediated (but not completely), areas that become flooded in the future and other catastrophic damage caused as a result of increased climate change weather events. **No individual or business should ever be responsible for the cleanup of their property of PCB pollution that occurred because of past actions by General Electric.***

Submitted March 29, 2024

Charles Cianfarini

Interim Executive Director

Citizens for PCB Removal



March 29, 2024

Clean Berkshire Collective
Public Comment Submission
GE/Arcadis/Anchor QEA Quality of Life Compliance Plan - Dec 2023

Dear Mr. Tagliaferro and EPA Region 1 Team:

This letter reflects the Clean Berkshire Collective's official public comment submission in response to the GE/Arcadis/Anchor QEA Quality of Life Compliance Plan (December 2023). Thank you for your time and consideration of this EJ-focused feedback.

As many have already pointed out, the GE/Arcadis Quality of Life Compliance Plan is inherently flawed in its being predicated on the assumption that GE's transportation and disposal plan was going to be approved in its original form, which was heavily reliant on trucks. As we know, the EPA has required GE to revise its plan and evaluate the rail option, so aspects of the QOL plan are moot. But it still bears responding to, given how alarmingly vague it is, and the omission of key indicators and steps to ensure the protection of the quality of life of those most impacted by the cleanup. The focus of these comments is mostly around Air Quality, Noise Quality, and the scant section on community health and safety, an element of the plan which is explicitly required by the 2020 Settlement Agreement.

Section 4: Quality of Life Standards

4.3.1 Development of Air Quality QOL Standards

The QOL Compliance Plan identifies PCBs and PM10 as the two pollutant categories that will be monitored during the cleanup. These may be the most consequential pollutants, but they are not the only ones of concern. The QOL Plan makes NO mention of the inevitable increased levels of other highly relevant "criteria pollutants" as designated by the Clean Air Act (CAA), 42 U.S.C. §§ 7401-7671¹ that will be generated during remediation. Most obvious is the fact that heavy machinery both on and off-road will emit a not-insignificant amount of diesel exhaust, which is a known human carcinogen and contains high levels of harmful fine particulate matter (PM 2.5) and nitrogen oxides (NO), among other byproducts.

¹ CAA is the primary federal statute governing air pollution, for which National Ambient Air Quality Standards (NAAQS) have been developed in service of protecting protect public health and welfare. The six criteria pollutants are respirable particulate matter smaller than 10 microns in diameter (PM10), carbon monoxide (CO), sulfur dioxide (SO2), nitrogen dioxide (NO2), lead (Pb), and ozone (O3), and, relevant to this cleanup, fine particulate matter, or particulate matter that is smaller than 2.5 microns (PM2.5).

Also https://www.epa.gov/system/files/documents/2022-08/PM_2021.pdf

- These pollutants can cause a variety of adverse health effects and will be generated by heavy machinery and vehicles used on a daily basis during construction, dredging, and transportation activities over the nearly two decade life of this project, posing the greatest risk for individuals who live closest to the dredging sites and UDF (and overburdened as is, having already been living in areas of increased exposure risk to volatilized PCBs) People are exposed to diesel fumes in highest concentrations during their time on roadways or in close proximity to vehicles and machinery using diesel.
- This omission is particularly glaring in the context of the T&D Plan they submitted which calls for the use of 30,000+ trucks over the course of 13 years.
- The QOL Plan fails to incorporate any measures for monitoring or mitigating the production of diesel emissions, PM 2.5 and other greenhouse gases or even to conduct testing and modeling during the site and transportation plan designs. / examine whether they are relevant
- GE justifies its approach to air quality monitoring, which proposes looking at only PM 10 and PCB levels, and omitting other relevant pollutants like PM2.5, with the following logic: *“Air quality standards from similar remediation projects were reviewed and considered for their applicability to the ROR project. The most applicable air quality standards are those used in prior remediation actions at the Site. The selected performance standards for air quality are the same as those established by EPA and used by GE for prior Removal Actions at this Site....”* (X) As will be discussed below, this is an erroneous/ flawed assumption and dangerous basis for decision-making.

On the subject of Ambient Air Monitoring, we respectfully ask EPA to require the following:

- GE must incorporate monitoring and mitigation efforts for levels of these pollutants, following National Ambient Air Quality Standards set by the EPA as well as any applicable standards set by the state of Massachusetts; the 2020 Revised Final Permit states that Massachusetts Air Pollution Control Regulations (310 CMR 7.00) are applicable to the project and that the “Remedy must comply with these provisions” (Attachment C, C-22 of the permit)
- We request that the EPA reject GE’s conclusion (noted above) that the most applicable similar remediation project is the completed portion of the GE-Pittsfield/Housatonic Superfund site, and prohibit them from making the assumption that those performance standards for air quality will be enough to produce a remediation at ROR sites that is protective of human health, given how much more diffuse dredging sites are, square mileage covered, and the many other factors that simply make it a different beast. (If ROR really were so similar to the Pittsfield cleanup, it wouldn’t have taken as long as it did to finalize the remedy, or required its own separate process for determining the nature and specifics of the cleanup.)
- GE need not think very critically or look very far to identify a PCB Superfund remediation they have already conducted that are more applicable to the ROR project, though not a perfect model by any means: **the Hudson River**. In fact, GE itself explicitly makes the link to the Hudson River Superfund Project as one that can serve as a useful point of comparison. See for example page 10, footnote 3: *“For comparison, the PCB air quality standard established by EPA for GE’s Upper Hudson River*

dredging project was a 24-hour average of 0.11 µg/m³ in residential areas.” As just one example from the EPA GE Hudson River Quality of Life Compliance Plan [Section on Performance Standards](#)

- *“Potential emission scenarios were examined to assess the type of pollutants that could be emitted. The primary pollutants identified as a potential risk to human health and the quality of life for this project are PCBs associated with the contaminated sediments. Other air pollutants, including PM10, PM2.5, CO, SO2, NO2, and O3, from equipment operations will also be evaluated. In addition, other possible pollutants such as metals that may be in the sediment will be evaluated.”*
- GE must also be required to adhere to the latest science that EPA follows on the subject of air quality monitoring. This includes using annual-based ambient air quality standards as well as 24-hour (not just 10 hour) monitoring standards, and following the agency’s key decision on February 7, 2024 to “strengthen the annual health-based national ambient air quality standard for fine particulate matter (PM2.5) from a level of 12 micrograms per cubic meter to 9 micrograms per cubic meter.”

CBC is primarily concerned with issues of environmental justice around the cleanup. We were thus pleased to read in the February 7th decision announcement by EPA that “along with strengthening the primary annual PM2.5 standard, **EPA is modifying the PM2.5 monitoring network design criteria to include a factor that accounts for proximity of populations at increased risk of PM2.5-related health effects to sources of air pollution.** This will advance environmental justice by ensuring localized data collection in overburdened areas to inform future NAAQS reviews.”

As anyone who lives here knows because they have experienced it, air quality has become more of an issue in the Berkshires with the increase in wildfires in Canada and the western US. (See for ex *Berkshire Eagle* “[That smoky haze you see over the Berkshires? Get used to it, researchers say](#)” Jul 27, 2021, etc.)

Please ensure these regulations are adequately implemented by holding GE to a higher standard than they propose in the QoL compliance plan.

4.4.1 Development of Noise QOL Standards

- Can GE produce maps on where it will put boundaries for designation of residential vs. non-residential zones? Since separate noise QOL standards were established for residential areas and non-residential areas (e.g., commercial, industrial, agricultural, and undeveloped areas).
- Noise QOL monitoring should be done on transportation routes as well, though we of course expect to see a drastic reduction in use of trucks following the next draft of the T&D Plan...

In certain Reaches, a significant increase in truck traffic will occur on roads directly passing schools, daycare facilities, assisted living facilities, a long-term psychiatric residential treatment center, libraries, restaurants, cultural centers, and countless residences.

One example of why this matters and why more research and thoughtfulness into the far-reaching effects of the cleanup for our most vulnerable lifestage populations is so necessary: [A 2022 peer-reviewed and highly respected study in Barcelona](#) showed that children who attended schools with

high road traffic noise at street level (≥ 55 dB) “had a slower development of working memory, complex working memory, and a slower improvement of inattentiveness over 12 months than those attending quieter schools in adjusted models. Similar trends with slightly weaker differences between groups were observed for schools exposed to high noise at the playground...” Researchers found that:

“while individual exposure to the annual average noise level in the classroom was only associated with inattentiveness, **exposure to intermittent noise** and to a greater number of noise events in the classroom was associated both with greater inattentiveness and slower complex working memory *and also marginally with slower working memory development*. These findings support the hypothesis that **the noise characteristics beyond the average noise level, i.e., its fluctuation, might be more relevant for children’s neurodevelopment in the classroom**. They also support the importance of carrying out detailed indoor noise exposure assessment in studies of the cognitive effects of noise, to move closer to the personal exposure inside the classroom. In other words, **the peaks of road traffic noise that propagate into the classroom (and their frequency) could be further disruptive for children’s working memory and attention development during concentration at school even when the average noise level in the classroom is lower and may only affect attention.**”

Much more thought and research is necessary to ensure our community receives maximum protection from the effects of the ROR remediation activities, including noise pollution. Please require GE to do a much more meaningful and thorough analysis of potential impacts like this.

7 Community Coordination and Health and Safety

The proposed mechanisms for communication and complaints represent an entirely “**top-down**” approach which will inevitably only fuel community mistrust and stress. Significantly, it also removes EPA from the reporting structure almost entirely.

Community health and safety goes beyond having a good system for lodging complaints in place (and this is not a good system). It is about community health and safety!!!! Aside from the token inclusion of a section heading “community health” there is essentially no mention of the potential impact on physical or mental health of residents. As our public comment on the T&D Plan emphasized, in reviewing and responding to the QoL Compliance Plan the EPA must make full use of its robust environmental justice and risk assessment tools – including by supporting community-led efforts to conduct a cumulative impact assessment to better inform decisions around the cleanup including a meaningful QOL Compliance Plan.

From an EJ perspective, key community health concerns around quality of life that were inadequately addressed or completely omitted from the proposal across all categories the plan, some of which have already been noted above, include:

Unequal impact of pollution sources: As the EPA points out, “fine particle pollution is of great concern to those with heart or lung disease and other vulnerable communities, including children, older adults, and people with health conditions like asthma, as well as already overburdened communities.” (For a full accounting of the health issues see our T&D Sign-On Letter). EPA has acknowledged the cumulative impact of exposure to chemical and non-chemical stressors. Given that those in closest proximity to the

most contaminated portions of the river have been exposed chronically to PCBs, the baseline risk of exposure to diesel emissions, as another carcinogen, is critical in developing feedback to all aspects of the plan including its approach to QoL. (See [EPA Exposure Factors Handbook](#); [ATSDR Framework for Assessing Health Impacts of Multiple Chemicals and Other Stressors](#) as examples)

Impact on children: As mentioned in the context of noise pollution above, the QOL plan refers only once to schools: "... to the extent practicable, the remediation contractor(s) will be encouraged to schedule trucking operations to avoid the key busy hours in each local community (e.g., school pick-up and drop-off times). Yet the T&D Plan includes routes passing numerous schools, daycares, and the Berkshire Montessori School less than a mile from the Upland Disposal Facility.. The word "child" is completely absent, as is the word bus. What about steps to ensure the public school bus depot in Lenox Dale adjacent to the planned UDF does not wind up getting contaminated?

- EPA notes that an "individual's lifestage might affect his or her susceptibility to chemicals or pollutants," and "children are often more vulnerable to pollutants than adults due to differences in behavior and biology, that can lead to greater exposure and/or unique windows of susceptibility during development." EPA Region 1 can hold GE accountable by applying its [agency's own guidance](#) as it relates to children to this cleanup through lifestage-specific risk assessments.
- EPA also has a [robust toolbox](#) of resources for better understanding lifestage-dependent exposure risks, and provides guidance on *Child Specific Exposure Scenarios* examples (2014) including highly pertinent Sections like 3.1 "Inhalation Of Contaminated Air While Playing In A School Yard: School Children Aged 6 To <11 Years," as well as Section 3.4 "Inhalation Of Contaminated Air During Bus Transportation: School Children And Teens Aged 6 To <16 Years, High-End, Chronic Average Daily Dose (p 55) given that school buses may experience "intrusion of volatile contaminants from outdoor ambient air." As part of its review and recommendations to GE, EPA must complete these calculations and make them available to the public.

Impact on Mental Health - A Major Indicator of Quality of Life. Mental health considerations are absent from the plan. Research including by the EPA shows that proximity to environmental cleanup sites, noise and light pollution, diesel emissions, etc., all have a negative impact on mental health. Any meaningful QOL plan must include measures to address this.

- It is worth noting that the word "stress" is **never used in relation to people**; only in relation to roads, infrastructure, pavement, etc. As EPA environmental justice priorities make clear, physical and psychosocial stress are key considerations for communities impacted by Superfund sites and environmental contamination and cleanup. EPA relevant guidance: See [Community Stress, Psychosocial Hazards, and EPA Decision-Making in Communities Impacted by Chronic Technological Disasters](#)

Road safety and accidents: The word accidents appears zero times. No contingency plan for inevitable traffic accidents? Berkshire County consistently has among the state's highest rates of traffic fatalities; many bustling town centers lack traffic lights, sidewalks, etc. Along with a spike in mental health emergencies as reported in the Berkshire Eagle last month, there has also been a huge increase in DUI's in Lenox especially in 2024.

Conclusion: Thank you EPA Region 1 for taking this feedback seriously!

Thank you for your consideration of this comment on the Quality of Life Plan. The EPA is a leader in policies, guidance, practices, and research that seek to protect the health and quality of life of all those who live in the United States. The wealth of information available on the EPA HQ and Region 1 Housatonic site have made navigating this difficult and complicated situation and been a true asset for comprehending the various documents open for public comment, and helping us find the language and vision for aspects of the remedy we feel could make a big difference for the physical and mental wellbeing of our community. We look forward to working with you to help make it easier to implement those practices on the ground.

Sincerely,
Julia Thomas
Clean Berkshire Collective

From: [gregory.whitehead](#)
To: [R1Housatonic](#)
Subject: Comment
Date: Tuesday, March 26, 2024 1:56:19 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear ROR project coordinators,

As a major environmental foundation based in the Berkshires, we strenuously oppose the plan to transport contaminated soils by truck through Berkshire towns and neighborhoods, across a time span of thirteen years.

As we have maintained throughout this extremely flawed process, such a plan appears to ignore the accelerating climate crisis, with no appropriate study of greenhouse gas emissions released through such an intensive use of large, inefficient burners of fossil fuel across such a lengthy time period, during which the effects of the climate crisis will become ever more acute throughout the region.

We also believe that such a plan represents a potentially serious threat to public health; assurances from GE regarding safe conveyance lack credibility.

While rail transport would be superior to trucks, we support on-site bioremediation, with the effectiveness of such processes improving with each passing year. To my knowledge, though the merits of bioremediation have been noted in various public meetings, no detailed feasibility study has been performed, even though such a plan would eliminate both the climate and health impacts associated with truck transport.

We strongly urge that such a study would be in the best public interest, avoiding inevitable negative consequences from both the proposed truck plan and the rail alternative. Our communities, and the environment upon which we all depend, deserve nothing less.

Sincerely,

Gregory Whitehead

J. Gregory Whitehead, President
Roaring Brook Family Foundation
[REDACTED] Lenox MA [REDACTED]
<https://roaringbrookfoundation.org>

Arnold M Malasky

[REDACTED]
Lenox MA [REDACTED]
[REDACTED]
[REDACTED]

Via Electronic Mail

March 28, 2024

Mr. Dean Tagliaferro
EPA Project Coordinator
U.S. Environmental Protection Agency
c/o HDR, Inc.
75 South Church St, Suite 403
Pittsfield MA 01201

Re: GE-Pittsfield/Housatonic River Site Rest of River (GECD850) Quality of Life Compliance Plan

Dear Mr. Tagliaferro:

Rolling Hills is a condominium community consisting of 108 single family garden apartment style units located at the southeast corner of New Lenox Road and Route 7. Our community objects to the proposed transportation method of the Housatonic River cleanup project for reasons common to other area residents and for reasons peculiar to our community.

New Lenox Road is a two-lane road running exclusively through residential communities. The road is relatively narrow and without sidewalks or shoulders. Children from Rolling Hills and from private homes along the road wait for school buses and walk this road. Many people walk along the road. While there presently are few trucks and relatively light traffic on New Lenox Road, it is challenging to drive this road if a truck is approaching from the opposite direction. An increase in truck volume and in the size of the trucks that travel this road will be treacherous.

In addition, those of us living along New Lenox Road chose the area, in part, for its tranquility. The sound of trucks piercing the quiet several times each day, or more, for years will change the quality of life for all of us who reside here.

If liquids or other forms of waste containing PCBs leak onto New Lenox Road, it will be difficult to protect pedestrians, including children, walking along the road.

Finally, there is an issue peculiar to Rolling Hills. Construction of two new automobile dealerships will begin during the coming months at the northeast corner of New Lenox Road and Route 7. This may result in construction traffic on New Lenox Road. While the entrance to Rolling Hills had been located on Route 7, when the State of Massachusetts widened Route 7 some twenty-five years ago, the State constructed a new entrance off of New Lenox Road less

than three car lengths from the traffic light at the corner of Route 7. As a result, when cars approaching Route 7 stop at the traffic light, it is already difficult for cars leaving Rolling Hills to turn left toward Route 7. A single large truck stopping at that light might prevent drivers leaving New Lenox Road from making a left turn. A right turn is not a viable alternative since it takes the driver deeper into the residential neighborhood with no access to any main road.

While any truck traffic carrying hazardous waste is both a nuisance and a threat to the beautiful roads and homes of southern Berkshire County, the use of New Lenox Road for such traffic is particularly dangerous. Cost should not be a factor in determining the method of removal since it is being paid by General Electric, the very company that created the issue. We agree with the recommendation of the various towns involved to use rail as the primary mode of transport.

Very truly yours,
The Board of Trustees
Rolling Hills Condominium Trust

A handwritten signature in black ink, appearing to be 'Arnold M. Malasky', written in a cursive style.

By Arnold M Malasky
Chairman of the Board of Trustees

From: [Anne Ferril](#)
To: [R1Housatonic](#)
Subject: Housatonic River Clean-up
Date: Thursday, March 28, 2024 8:44:16 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Please let it be known I want to support rail transport of the PCB and any other toxic materials that are to be removed from the Housatonic River.

Anne Ferril

[REDACTED]

Stockbridge MA [REDACTED]

From: [barbara norton](#)
To: [R1Housatonic](#)
Subject: Quality of life compliance plan
Date: Thursday, March 28, 2024 4:54:16 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Sirs:

I think the compliance and clean up plan is woefully inadequate. There does not appear to be any consideration of using rail to transport the contaminated sediment out . I am not impressed with being notified when clean up is in progress. Is this so we can hide in our homes with the windows shut? Perhaps we can hold our breath when the trucks go rolling by. I did not move to a small town not to be able to enjoy its Main Street and shops. The horse is already out of the barn since our town leaders apparently sold us all down the river. Using rail transport will give us some hope that we will have a viable town after all this clean up is finished.

Barbara Norton

[REDACTED]

Lee, Mass.

From: [Charles Kenny](#)
To: [R1Housatonic](#)
Subject: GE's plans to size the UDF and protect quality of life before it has put forward an adequate transport plan
Date: Saturday, March 30, 2024 2:53:43 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

GE's plans to size the UDF and protect quality of life before it has put forward an adequate transport plan are premature and inappropriate.

This is putting the cart before the horse and actually detracts from quality of life.

GE's plan really is to get everyone to commit to the illusion of a UDF size that anticipates that most waste goes on-site. This saves GE money at the expense of the quality of life in our small towns.

EPA promised us just the opposite: "The Permittee (GE) shall propose the methods and locations for off-site disposal to EPA for review and approval.

Permittee's proposal shall include measures to maximize the transport of such waste material to off-site facilities via rail, to the extent practicable."

EPA should act with veracity and fulfill this promise. To let GE get away with its self-serving untruths is a betrayal of promise. EPA should make it clear to everyone that the UDF does not have to receive all, most, or even the majority of the waste.

Charles Kenny MD
Stockbridge

From: [DENNIS FIELD](#)
To: [R1Housatonic](#)
Subject: Comments on GE Quality of Life Plan Housatonic River
Date: Friday, March 29, 2024 7:24:07 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Mr. Tagliaferro,

I support and I am in agreement with the comments on the Quality of Life Plan submitted by Clean Berkshire Collective.

Debra Kelly
Lenox MA

Sent from [Mail](#) for Windows

From: [REDACTED]
To: [R1Housatonic](#)
Subject: GE Quality of Life Plan
Date: Friday, March 29, 2024 10:38:09 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear EPA,

I am in full agreement with the comments in the Clean Berkshire Collective re: GE Quality of Life Plan of the Housatonic River remediation.

Fay Parker

March 29, 2024

Mr. Dean Tagliaferro
EPA new England
10 Lyman Street, Suite 2
Pittsfield, MA 01201
R1Housatonic@EPA.gov

RE: SEMS DOC # 67162 Comments

Dear Mr. Tagliaferro & EPA reviewers

Please be advised, I have read, understand, and I am in full support of The Town of Lee, Clean Berkshire Collective, and Task comments regarding the GE/Arcadis/Anchor QUEA Quality of Life Compliance Plan (December 2023). In addition, I am in full support of the Town of Lee comments regarding the Adaptive Management Plan comments.

I am disappointed in EPA's lack of interest in finding a solution to destroying PCB's and their desire to allow GE to repeat the antiquated routine (previously use for the unsuccessful remediation of the Hudson River), of dredging PCBs and then dumping them onto an unsuitable site within an ACEC, on top of clean Sand and gravel over a 2.2 million GPD aquifer. GE and EPA may have won in court, but that does not mean that the project will improve or eliminate PCB contamination. In fact, it is clear to me the hazardous waste will only be spread throughout the Berkshires and further contamination will occur putting the public at greater health risk of exposure throughout Southern Berkshire. I find Mr. Tagliaferro's comment that the hydrologically pumped PCB laden water will be allowed to flow back into the Housatonic River after separating the sediment from the liquid to be errant and flippant and goes completely against the Clean Water Act. Clearly this project is political and public health is not a priority.

GE never addressed public health within the Quality of Life because they really had nothing to say or defend.

Sincerely,
Gail Ceresia
Professional Wetland Scientist, Registered Sanitarian, Soil Evaluator.

From: [REDACTED]
To: [R1Housatonic](#)
Subject: Public comment: Quality of Life Compliance Plan
Date: Wednesday, March 27, 2024 1:02:43 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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 "Quality of Life Compliance Plan". As more information comes to light, the potential risks to public health and the environment are seriously disturbing. Proven gross negligence is already a major part of this PCB problem from the onset. Distinctly possible leakage, risks from volatilization, potential human error and/or more irresponsible decisions being made, all raise concerns that standards, monitoring and proposed remedies do not go far enough and leave too much room for interpretations that would be at the further expense of our Towns.

Disturbing and moving contaminated sediment will unfortunately impact air quality, noise, odor, light factors, roads, etc., for Berkshire residents for 13 long years or more no matter what measures are in place. Nevertheless, the "Quality of Life Compliance Plan" is still writing more about truck transportation impacts rather than rail transport, which many of us believe could significantly improve quality of life factors. We are concerned that the proposed plan is not incorporating these rail options and leaves too much room for more negligence that could compound the significant damage that has already been done.

Throughout this whole process, we have lost trust that GE proposals hold Berkshire County concerns as their highest priority over self interest. Please consider that this plan needs to go back to the drawing board and give more consideration to quality of life improvements possible if rail becomes the primary mode of transport. The plan needs to then include standards, monitoring and remedies related to the use of the Housatonic Railroad as the primary transportation plan.

Sincerely,

James and Christine Schwarz

[REDACTED]
Lee, MA [REDACTED]

From: [Jean R Brown](#)
To: [R1Housatonic](#)
Subject: Rest of River Quality of Life Plan
Date: Thursday, December 28, 2023 5:00:47 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I am a Lee, Massachusetts resident, and I oppose the PCB dump which appears to be inevitable at this juncture.

Given the dump plan, I urge the EPA and GE to mitigate the impact on the lives of residents and visitors to the Berkshires by the use of local railroad lines located near the dump site in Lenoxdale and Lee.

Trucking PCB contaminated materials poses imminent risks to residents of Lee and other towns and visitors to our area. In summer heat, PCBs become airborne and have been shown to be harmful to human and animal health. Trucks moving through our small downtown roads will be a hazard increasing traffic, noise and exhaust pollution, wear and damage to road surfaces.

Jean R Brown

Lee, MA

Sent from my iPad

From: [Joshua Bloom](#)
To: [R1Housatonic](#)
Cc: [info@lenox.org](#); [Director Lee Chamber](#); [betsy@southernberkshirechamber.com](#); [info@stockbridgechamber.org](#); [lmick@cityofpittsfield.org](#); [mcoakley@cityofpittsfield.org](#); [rbrien@downtownpittsfield.com](#); [info@1berkshire.com](#); [culturalgb@gmail.com](#); [Robert Jones](#); [Gdb](#); [sean regnier](#); [Christopher Brittain](#)
Subject: Business and tourism impacts missing from GE's Quality of Life Compliance Plan
Date: Monday, January 29, 2024 2:13:18 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear EPA,

I have cced representatives of the Chambers of Commerce and business development community in Pittsfield and the Southern Berkshires to draw their attention to GE's Quality of Life Compliance Plan (<https://semspub.epa.gov/work/01/679162.pdf>) for the planned dredging the Housatonic River to remove PCB contaminated sediment in Pittsfield, Lenox, Lee, Stockbridge, and Great Barrington and to create the Upland Disposal Facility (UDF) in Lee as a landfill for the lower toxicity material.

As you know, GE's Quality of Life Compliance Plan failed to consider the possibility of using rail transportation rather than trucking for the 13 years of remediation. I and others have already highlighted how GE is trying to allow volatilization levels far in excess of safe, generally advisable standards, and how GE is not willing to adhere to local Berkshire town bylaws for noise, light, traffic, and pollution, and our towns have no way to enforce our local ordinances if they are in violation.

What I've come to realize is crucially absent from GE's Quality of Life Compliance Plan is any study or discussion of the impact this 13 year remediation project will have on tourism and business in general in our towns.

Have the Chambers of Commerce, business communities, tourism and hospitality industries been consulted or asked to weigh in on the potential impacts on the quality of life in the Berkshires? It doesn't appear so. If that is the case, that seems like a gaping omission that must be addressed by GE and the EPA immediately.

Further, the Quality of Life Compliance Plan only takes into consideration recreational activities in the river (boating and fishing) and immediately on the banks of the river (walking and biking trails), but fails to address the impact of municipal parks and playgrounds located along the river.

GE's commitment to "facilitate [Pittsfield and the towns'] future enhancement of recreational activities—such as canoeing and other water activities, hiking, and biking on trails—in the ROR corridor, on properties subject to remediation, and/or at locations of temporary access roads and staging areas" lacks any specificity or financial commitments. At a time when trails along the river are being expanded, it is important to know if GE bears any financial responsibility toward those projects or towards park and playground enhancements.

Sincerely,
Josh Bloom
Lee, MA

From: [Joshua Bloom](#)
To: [R1Housatonic](#)
Cc: [Christopher Brittain](#); [Robert Jones](#); [Gdb](#); [sean regnier](#)
Subject: Section 7 of GE's Quality of Life Compliance Plan Incomplete
Date: Friday, February 9, 2024 12:36:03 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear EPA,

I went through GE's Quality of Life Compliance Plan again this week and noticed that Section 7 of the report is titled Community Coordination and Health and Safety, yet the section never mentions health again.

Demand that GE re-write this section of the report and thoroughly address how it will protect the health of area residents and how residents can register health related complaints.

Sincerely,
Josh Bloom
Lee, MA

From: [KIT TURNER](#)
To: [R1Housatonic](#)
Subject: Housatonic River Clean-up Concern Pittsfield Lenox
Date: Friday, March 29, 2024 4:15:34 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good Afternoon ,

We live off of [REDACTED] and have been a part of past conversations regarding the clean up. We are very concerned about the large trucks (15 a day we read) carrying toxic materials and likely spillage through residential neighborhoods on a road that has been marked for no commercial/large vehicles. We just had our Holmes Road compromised bridge replaced after 5 years with compromised travel, noise and pollution and now large vehicles will be allowed to use Holmes rd? Why is that?

Not to mention disrupting the ecosystem of canoe meadows and all the impact on the wildlife.

Kit & Will Turner

[REDACTED]
Pittsfield, MA [REDACTED]

From: [Marlene Franklin](#)
To: [R1Housatonic](#)
Subject: I am concerned
Date: Thursday, March 28, 2024 2:23:02 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I own a condo in Lenox MA. I am concerned about GE's plan to transport cancer causing materials over the roads of Lenox.

Sent from my iPhone

From: [Philip McCaffrey](#)
To: [R1Housatonic](#)
Subject: GE "quality of life compliance plan" for ROR cleanup
Date: Thursday, March 28, 2024 6:12:17 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Thanks for the opportunity to comment on the proposed plan. I want GE to abandon the idea of trucking PCB-contaminated material and implement a rail system for carting off hazardous waste, and at their expense. In fact I want the entire remediation project to be fully funded by GE.

With thanks,

Philip McCaffrey

[REDACTED] Stockbridge MA [REDACTED]
[REDACTED]

From: [Robin Dumas](#)
To: [R1Housatonic](#)
Subject: STOCKBRIDGE RESIDENT COMMENTS
Date: Wednesday, March 27, 2024 8:36:04 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

I have read the recent 'quality of life' document and find it largely aspirational. Terms such as "to the extent feasible" are used throughout, materially diluting any actual obligations on the part of GE.

Further, much of the 'plan' is remedial rather than proactive. And the remedial measures have no SLA's....we have a massive leakage. GE will do x y and z. When? How quickly? Are there penalties imposed for not acting within specified time frames?

For example - we destroy the roads, maybe we'll fix them. We have a leak - maybe we'll do x, y and x. When?? And if GE does not, then what? Another decade of meetings and chats?

This is not a plan. This is a wishy washy document that merely outlines goals and targets with very little accountability, or requisite liquidated damages in cases where even the targets and goals fail.

This big mess and the jungle of bureaucratic doublespeak has been playing out over decades. Has anyone evaluated recent scientific developments/approaches that would avoid the possibility of ruining air quality, putting citizens' health at risk, and destroying an area that is largely dependent on tourism? In my opinion, (1) the argument should shift from trucks vs rail to: is there an alternative to dredging and perpetuating the hazards that have been present for decades? With recent advancements, can this be done in a way to seriously mitigate danger to humans, animals and our infrastructure?; and (2) if anyone is serious about the clean up (which I don't think the government or GE is truly interested in doing properly), as a resident of Berkshire County, I'd like to see actual commitments and accountability, rather than a 'plan' that has neither (as I read it). Service Level commitments. Penalties for failure to achieve. If this was a corporate deal and not some government initiative, all of these would be expected and standard.

Thank you for reading.
Robin

From: [Steve Averbuch](#)
To: [R1Housatonic](#)
Subject: GE-Pittsfield/Housatonic River Site Rest of River (GECD850) Quality of Life Compliance Plan
Date: Friday, March 29, 2024 10:22:24 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I have reviewed the GE-Pittsfield/Housatonic River Site Rest of River (GECD850) Quality of Life Compliance Plan and I have found it to be clear and comprehensive.

It is well known that PM2.5 causes greater harmful health effects than larger particles and the EPA has historically tightened the standards for PM2.5 including most recently in 2024 reducing the annual level to 9.0 ug/m³.

The nature of the activity related to all aspects of the remediation projects, including but not limited to heavy equipment and trucking, is likely to create concentrated fossil fuel related emissions that include PM2.5.

It is my opinion that air monitoring for PM2.5 and 24 hour thresholds should also be incorporated into the monitoring, compliance and reporting of the air quality for each remediation project. If this is not scientifically justified, please explain why.

Thank you for your consideration,

Steve

Steven Averbuch, MD

[REDACTED]

[REDACTED]

[REDACTED]

Stockbridge, MA [REDACTED]

Exponential growth inside a finite system leads to collapse. (Richard Powers – The Overstory)

The climate crisis isn't about who's right. It's about who's helping.

Climate change is an existential threat and as an oncologist, I fear for the future of humanity. However, I am not ready to put the human race on hospice.

There is never time in the future in which we will work out our salvation. The challenge is in the moment; the time is always now.

From: [Steve Ball](#)
To: [R1Housatonic](#)
Subject: Feedback
Date: Tuesday, January 30, 2024 7:28:39 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I am a Lenox Dale, MA resident writing to express concerns about the GE Rest of River Clean Up plans.

Regarding the Transportation Plan for the clean-up - 13 years of trucking is unbearable. I strongly believe that rail is the right answer - from the Gt. Barrington site back to the UDF for points south of the UDF and directly to the UDF from points north of it. I believe that construction of a bridge at Woods Pond to allow trucks to go directly from train to UDF from the existing train station, and the construction of rails from the existing track to the UDF to allow trains to go directly to the UDF are both feasible - and doing both may serve the project best. Please have GE honestly and thoroughly explore and report on rail as an option - perhaps as the only option for 95% or more of the material.

Regarding the Quality of Life plan - we have been told that the work will not exceed 80 decibels, and that 80 decibels is comparable to a dishwasher running. Trucks' diesel engines are louder than any dishwasher - and so the Plan must be referring only to the equipment permanently installed on the worksite and not inclusive of all of the noise generated at the worksite. Please have GE re-evaluate their Quality of Life Plan to include the sounds of the trucks and other equipment coming and going at the workplace - I imagine that most trucks will be idling while there as well and so the din of the trucks will exceed the Plan's limits as presented thus far. Work stoppage when the noise exceeds agreed-upon levels will only further delay the project, but the noise of equipment at the site - including trucks - is unlikely to ever be as quiet as a dishwasher and will only lead to disputes and injunctions. 13 years of idling trucks and that level of noise is not a good (or bearable) quality of life for those along the Housatonic.

UDF Plan - nowhere in these presentations have we heard about the 4-year plan for the construction of the UDF. What is the Transportation Plan for those 4 years? What is the Quality of Life Plan for those 4 years? Why have we not been given the option to review and comment on these Plans? I imagine that the same objections will be present: rail should be used - not trucks - to deliver and remove material to the UDF site (even if requiring new track to the site from the existing track or a bridge from Lenox Station to the UDF for direct trucking); there should be a noise limit that is agreed upon, and a limit to the hours each day that the work can be done (and hours in the evening and early morning that work is not done). Can the announced Transportation Plan and Quality of Life Plan officially be extended to cover the 4 years of work at the UDF in the absence of stand-alone plans for that, or UDF Plans be

made and published for comment?

Steve

Steve Ball, Shakespeare & Company General Manager


██████████ Lenox, MA ██████████

From: [Steven Jones](#)
To: [R1Housatonic](#)
Subject: GE Rest of River Plan
Date: Friday, March 29, 2024 8:24:20 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Mr. Tagliaferro:

I am writing to endorse the railroad option for this cleanup, as opposed to the truck plan. The existing tracks for the Housatonic RR and a great alternative to ten years of truck traffic, with the associated risk and road wear. The rail option, which wouldn't not affect passenger service to the Berkshires, keeps the remediated sediment farthest from homes and safely off the roads. East St and New Lenox Road are residential, rural streets without sidewalks, with curves and hills and dangerous intersections (East and New Lenox) so I hope you will seriously consider rail.

Steven Jones


From: [Gwen](#)
To: [R1Housatonic](#)
Subject: Housatonic River cleanup concern, Pittsfield and Lenox, MA
Date: Friday, March 29, 2024 10:18:31 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Morning,

The river does not run that close to East New Lenox Road, so how does the sediment get from the river to East New Lenox Road? We live in the four street, cul-de-sac neighborhood two miles down East New Lenox from Williams Street. (We are still dealing with the bridge that has been being worked on for nearly two years and is still only one-lane between Williams Street and the Anita-Lucia-Quirico-Joseph Drive neighborhood.) Would these large trucks actually travel over the maybe-finished-by- then bridge - and will that bridge sustain it. And there are other little bridges over gulleys all the way down East New Lenox Road.

East New Lenox Road is extremely narrow, especially around numerous curves from Joseph Drive to the Lenox line. In no way is it made for large trucks and vehicles traveling at the same time; there is barely room when two cars are approaching each other from opposite lanes. Add a truck/car or two trucks to that scenario and it's completely dangerous.

If the soil cannot be moved in by train, the most preferred method, then trucks from Holmes Road to New Lenox to Roaring Brook is far better as those roads are much wider and better maintained and Holmes Road no longer has an issue with its bridge.

Tom and Gwen Connolly

From: [Verena Smith](#)
To: [R1Housatonic](#)
Subject: Quality of Life plan comment
Date: Friday, March 29, 2024 8:35:36 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I support/am in agreement with the comments in the Clean Berkshire Collective submission.

Verena Smith
Lenox

From: [Sushila Schwerin](#)
To: [R1Housatonic](#)
Subject: PCB Removal and storage concerns
Date: Friday, March 29, 2024 9:06:01 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I am a long term resident of LenoxDale who resides on [REDACTED]
I vehemently apprised the Rest of River clean up plan . I filed a compliant with state attorney general against the Town of Lenox for their closed meeting participation where current PCB removal deal was sealed .

I am extremely unsettled with the current removal and transportation plan.

I lived through the upgrading [REDACTED] and lived across the street for road construction that recently built up the road to handle more weight , widened the road and added sidewalks and bike lanes .

The road construction staging site and years project was so loud and disruptive it highly impacted my nerves and hearing.

The current increase of semi truck traffic from Lane Construction has impacted all the homes and families living on Walker . It is a speedway.

Traffic control measures fall short .

More than several times debris from trucks have been scattered on Walker Street .

I am forced to consider leaving my community and selling the home I was hoping to maintain for generations.

Please find new answers to our sick river. If this current clean up plan can not deterred please consider rail .

Sincerely ,
Virginia Schwerin

[REDACTED]
Lenox Dale MA
[REDACTED]

From: [REDACTED]
To: [R1Housatonic](#)
Cc: [Patrick White](#)
Subject: Rest of River
Date: Friday, March 29, 2024 2:17:38 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hello,

I live on [REDACTED] in Stockbridge and am very worried about the truck plan.

The houses on Church are close together and close to the street. We have several families with young children and many with pets. Even now cars and trucks take the turn from Main Street to Church very fast. This is a blind corner for pedestrians and the sidewalk abuts the street.

It's difficult to believe that there won't be spills and fumes that are harmful to health, nor that so many trucks can avoid accidents over so many trips. Many residents on our street have to back out of their driveway.

This solution is merely expanding the areas affected by the pollution, not solving the problem.

Wendy Strothman

[REDACTED]