

Public Input on General Electric's October 31, 2023
On-Site and Off-Site Transportation and Disposal Plan

February 2024



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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January 31, 2024

Sent via regular mail and electronic submittal to:

R1Housatonic@epa.gov

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

Re: Comments on *On-Site and Off-Site Transportation and Disposal Plan for the Rest of River, October 2023*, prepared for General Electric Company by Arcadis –
GE/Housatonic River Site

Dear Mr. Tagliaferro:

The Massachusetts Department of Environmental Protection (Department, or MassDEP) submits comments numbered below for *On-Site and Off-Site Transportation and Disposal Plan for the Rest of River, October 2023* (T&D Plan), prepared pursuant to Section II.H.10 of the Revised Final Permit issued by U.S. Environmental Protection Agency (U.S. EPA) for the General Electric/Housatonic River site. The T&D Plan was prepared for General Electric Company (GE) by Arcadis in accordance with the requirement specified in Section 4.3.1.1 of the *Final Revised Statement of Work, September 14, 2021*, prepared by Anchor QEA for GE and approved by U.S. EPA.

MassDEP continues to support the use of rail transport to the extent possible for both on- and off-site disposal. We believe that rail transport of contaminated media provides a safe and effective means of transport and should be maximized to the extent feasible for the GE/Housatonic River site. The Commonwealth first expressed our support for maximizing rail

This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282.

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transport for contaminated sediment and floodplain soil from Rest of River in 2014 in response to U.S. EPA's Draft Modification to the Reissued RCRA Permit issued in June 2014.¹

As outlined in our comments below, the T&D Plan requires additional detail to evaluate the benefits of rail vs. truck transport of site contaminants to the Upland Disposal Facility or off-site, out of state locations.

Specific Comments:

1. On October 20, 2014, MassDEP issued guidance for assessing greener cleanups for assessment and remediation that eliminate or reduce the environmental footprint of cleanup activities to the maximum extent possible. The focus of such approaches includes addressing five core elements or factors for reducing the environmental footprint of a cleanup: • **Minimizing total energy use** while maximizing the use of renewable energy; • **Minimizing emissions of greenhouse gases and other air pollutants**; • Minimizing water use and impacts to water resources; • Reducing, reusing and recycling materials and waste; and • Avoiding or reducing adverse impacts to ecosystems and land resource. The T&D Plan should include a determination or projection of the potential energy use, greenhouse gas or other air pollutants associated with rail vs. truck transportation in evaluating these transportation methods for both on- and off-site transportation.
2. The T&D Plan does not evaluate potential impacts to quality of life issues on the local community. Although this information may be presented in GE's Quality of Life Plan, evaluation of these issues should be included in the T&D Plan and should minimally include an assessment of noise, potential for vehicle accidents, impacts to local infrastructure and potential future costs associated with infrastructure impacts.
3. In Section 1.1, the T&D Plan states several factors were considered in the development of the plan but how these factors were weighed is not stated. Some of the factors cited include professional judgement, experience on other similar projects, and community input. However, there is no information to understand how professional judgement was utilized nor the qualifications of the professionals utilizing their judgement in developing the T&D Plan. In addition, the plan makes reference to the successful use of trucks for the remedial actions at the 0.5-mile and 1.5 mile reaches of River as support for truck

¹ Letter Correspondence dated October 27, 2014 from Commonwealth of Massachusetts to Mr. Dean Tagliaferro, EPA New England, GE/Housatonic River Site - Rest of River Commonwealth of Massachusetts' Comments on EPA's Proposed Cleanup Plan for Rest of River (June, 2014)

transport. The Department disagrees that the 0.5 mile and 1.5 mile reaches of river are sufficiently similar to the work needed for Rest of River to support selection of truck transportation. Finally, the T&D Plan indicates community input was considered in development of the plan and makes reference to transportation routes (see comment # 9). However, the specific input received and from which members of the community is not identified nor is information on how community concerns were addressed. MassDEP considers community engagement and input an integral part of environmental cleanup actions.

4. The T&D Plan states, “The use of the railroad for such transport is constrained by the railroad’s availability to move cars as needed, as well as by other railroad traffic, which could dictate and delay construction sequencing and schedule. This could result in a stoppage of removal activities and/or operations at the UDF.” The statement reveals only that there is a possibility of impacts if rail is used without providing sufficient detail to evaluate rail vs. truck transport. The T&D Plan should include specific information regarding the railroads availability to move cars and potential impacts on the schedule from other rail traffic.
5. The T&D Plan states, “To use railroad transportation to move material to the UDF effectively and efficiently, a railroad siding for loading materials would be required in proximity to the removal staging areas.” The T&D Plan additionally cites the uncertainty in obtaining access to property to construct a railroad siding or the potential impacts to the surrounding land or infrastructure. The T&D Plan should identify needed potential railroad siding locations, including identification of specific locations on a detailed figure. The current figures lack sufficient detail to evaluate the T&D Plan’s statements concerning the development of rail sidings.

Additionally, the T&D Plan states, “There are currently no usable railroad sidings available in or in proximity to the UDF or Reach 5A (or any RU). (If, at the time of work at a specific RU, a siding has been developed or reconditioned by a third party, GE will reconsider whether it is feasible and/or appropriate to use that siding for railroad transportation of material to the UDF.)” The Department notes that the T&D Plan appears to establish existing, active infrastructure as a threshold criterion for evaluation and selection of transportation modes. This is not identified as a pass/fail condition in the Settlement Agreement or the Final RCRA Permit for Rest of River. In addition, without a commitment to GE’s use of rail, it is unlikely that a third party will develop or

recondition a siding. GE should evaluate costs vs. benefits of developing or reconditioning a siding vs. the cost associated with truck transport.

6. The T&D Plan states, "...the total number of truck trips under this rail transport scenario would be double the number in the scenario involving direct truck transport to the UDF (Table 3-2), although the distance of the truck trips would generally be shorter and the routes of the truck trips would likely differ from those anticipated for the truck trips directly to the UDF." Truck miles/potential emissions estimates are essential for the overall project impact evaluation, where the number of trips becomes potentially less relevant.
7. The T&D Plan states, "The use of truck transportation provides greater flexibility during implementation of the remedial activities and is not hindered by potential delays with rail transport equipment, schedule, or other rail customers along the route." This statement is difficult to evaluate because GE has not specified the potential delays associated with rail. Please see comment #4.
8. The T&D Plan states in support of selecting truck transport vs. rail, "Truck transportation is widely used as a method for transporting sediments and soils and is a technically feasible method for transportation of materials for off-site disposal." We do not disagree but the technical feasibility of rail transport, where it is available, is also true.
9. The T&D Plan states, "As described in Section 1.4, this T&D Plan has considered communications from the local municipalities regarding the transport and disposal of excavated/dredged materials to the UDF and to off-site disposal facilities. As a result of those discussions, changes have been made to potential travel routes (e.g., by avoiding or limiting use of certain roads), and additional efforts are still being made to coordinate with property owners and municipalities to further identify potential travel routes." While communications with the municipalities and potentially affected private landowners is needed, GE should be required to consider other public input. Public involvement is an important aspect of environmental remediation.
10. On June 24, 2021, the Department issued its revised Environmental Justice (EJ) Policy stating that "environmental justice principles shall be an integral consideration, to the extent applicable and allowable by law, in making any policy, making any determination or other action related to a project review." The T&D Plan does not include adequate information on the potential environmental burdens generated by the transportation

January 31, 2024

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options explored or how those burdens may be distributed under different scenarios. Nor does it include information on EJ populations, which may be impacted by the transportation options. Enhanced public outreach efforts should be focused on EJ populations, which may be impacted by transportation methods under consideration. The Department notes that both the Pittsfield CSX and Worcester intermodal facilities are located within EJ Massachusetts identified communities, and another Massachusetts identified EJ community exists along the Housatonic River in Reach 7B.

11. The T&D Plan states that “Hydraulic transport is not considered feasible for sediments from Reaches 5A, 5B, 7, or 8” but does not elaborate. GE should provide additional detail regarding how hydraulic transport feasibility was determined.

12. Table 4-3 should identify which of the facilities can accept material by rail.

MassDEP thanks you for the opportunity to comment on this document. Please contact me should you have any questions regarding these comments.

Sincerely,



Michael J. Gorski
Regional Director

cc: John Ziegler, MassDEP
Benjamin Gudi, MassDEP



THE GENERAL COURT OF MASSACHUSETTS
STATE HOUSE, BOSTON 02133-1053

January 24, 2024

[VIA EMAIL: tagliaferro.dean@epa.gov

r1housatonic@epa.gov]

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

Dear Mr. Tagliaferro,

We write today as the State Senator and State Representative for all towns affected by General Electric's Housatonic Rest of River transportation plan. We are in strong support of the use of rail transportation for the transport of all PCB soils, whether to the Upland Disposal Site or out of state facilities, in all situations where it is technically feasible and safe to do so.

The transportation plan recently submitted by Arcadis on behalf of General Electric downplays the use of rail and highlights the use of trucks. This appears to be a proposal made with significant disregard to the short and long term benefits to the people and communities of our region. Our disappointment in this proposed plan is sharp and shared by the vast majority of the people and elected officials of the affected towns we jointly serve.

The emphasis on truck transportation in the plan presented on behalf of General Electric appears to be based on one factor alone, the ability of General Electric to reduce costs to cleanup a region it polluted and largely abandoned.

We see rail transportation as the ideal choice for this project based on several safety factors including reductions in vehicular traffic, vehicular emissions, and far less wear and tear of local roads. In addition, rail transportation would reduce noise, traffic, and other avoidable disruptions to the communities in our region, as well as improved outcomes for the health and well-being of the public.

The use of hydraulic dredging and conveyance would also reduce the truck traffic in the impacted towns because sediments dredged using this method can be moved to centralized staging areas. These centralized staging areas would, in turn, reduce the need for constructing haul roads and other staging areas. Hydraulic dredging and conveyance will assist in mitigating the already harmful environmental effects of the cleanup and fulfill our responsibility to ease the concerns of local residents and those visiting our region.

This proposal to utilize rail transportation will not eliminate trucks, but it will exponentially reduce the number of trucks while making the cleanup more efficient and economical. With this approach the length of the project could possibly be reduced from 13 years to anywhere from 8-10 years, further exemplifying the efficiency and economic advantages of rail. We hope the EPA will consider these factors and agree on the importance of rail transportation.

We urge the EPA to strongly consider the needs of our region and weigh heavily on the comments from the people and communities who have already been negatively impacted by the past actions of General Electric and stand to bear the brunt of the impact from the proposed cleanup. We stand in unity with our towns and residents to request the prioritization of rail transportation in all situations where it is technically feasible and safe to do so during the Housatonic Rest of River project.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. Mark".

Paul Mark
State Senator
Berkshire, Hampden, Franklin
& Hampshire District

A handwritten signature in blue ink, appearing to read "Smitty".

Smitty Pignatelli
State Representative
3rd Berkshire District



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: January 31, 2024
Subject: *Comments on GE-Pittsfield/Housatonic River Preliminary Transportation Routes in Reach 5A*

The City of Pittsfield appreciates the opportunity to provide initial comments on preliminary transportation routes and methods being considered in Reach 5A as part of the Rest of River (ROR) clean up. We understand that GE is still investigating potential transportation routes and that the routes initially presented are not final and are subject to further public input and EPA review and approval.

Of particular note, though, is that the conclusions drawn within the *Plan* identify the use of trucks as the preferred transportation alternative for both on- and off-site transportation of ROR waste materials. Other alternatives such as hydraulic and rail (or a blend of methods such as trucks and rail) are also presented, however the benefits and drawbacks of these alternatives are not thoroughly described. It would be helpful to see the analysis of impacts for each type of proposed transportation method in a summarized format for ease of review.

We offer the following additional comments on the Reach 5A *Plan*:

The City is not in favor of the option being considered in which material removed from Reach 5A needing to travel out of state for disposal would travel northerly to Route 20 as it makes its way west to Route 90.

The City is in support of the decision to classify certain local roads in three Pittsfield neighborhoods as 'restricted use'.

The City supports the use of hydraulic pumping of materials to the maximum extent practicable.

The City requests that any use of Chapman Street be eliminated from any possible consideration as the intersection Chapman and Holmes has been identified as needing improvement.

The City is open to the exploration of using the WWTP on Utility Drive for a possible rail siding for the transport of materials to the UDF or other disposal location(s).

Regarding safety considerations, we note that the *Plan* does not include a quantitative analysis of increased traffic safety issues that would be expected using the different methods of transportation (rail, truck or a blend of both) for Reach 5A such as vehicular accidents, operator accidents and spills. It would be useful for the City to understand the anticipated incidence of traffic accidents and other safety concerns (such as waste material spills) by type of transportation method (truck, hydraulic and rail) in order to better understand the safety implications associated with the preferred transportation alternative chosen by GE.

Concerning the potential for spills during on-site transportation, the City looks forward to review of the Project Operations Plan (POP). The treatment of spills is an important safety concern to the City and as such we look forward to a thorough review of that plan.

The City suggests that the transportation alternatives be closely reviewed with transportation professionals such as safety and engineering staff associated with the Massachusetts Department of Transportation (MassDOT).

The entire disposal process for removed waste materials has been defined based on total PCB analysis data gathered from previous studies. However, there is no mention in the Plan of whether occasional sampling will be conducted to verify total PCB content assumptions as the media is removed. It seems appropriate to take samples of distinct types of media from known contaminated areas to determine if the measured PCBs match the assumed PCB levels and therefore are being disposed of in an appropriate way. This occasional sampling will ensure that the disposal location chosen for each batch of materials is appropriate, given that each batch's PCB concentration will determine whether that batch is disposed of on-site or off-site.

The City notes that there appears to be a lack of information around the disposal procedures for the treatment of decanted water from sediment waste materials. The water itself likely will be a hazardous waste, and any resulting filtrate of sediment collected from water treatment will also be a waste requiring management and appropriate disposal. The city seeks additional information related to how the decanted water and treatment-produced materials are to be addressed.

The City calls out the following statement from the 2020 *Settlement Agreement – Housatonic River, Rest of River*, Page 20 as it relates to pre-remediation road infrastructure assessment and cataloging:

GE shall document the pre-existing condition of any municipal road to be used during remediation using 360-degree road imaging technology plus 3D road surface imaging technology. GE shall also photographically document the condition of other visible infrastructure associated with such roads, including bridges culverts and other exposed infrastructure that is not captured by the road scanning process and provide that documentation for review by the affected municipality. GE and the affected municipalities will meet and confer in good faith, and in consultation with experts, regarding the need for the use of Ground Penetrating Radar (“GPR”) technology to assess subsurface conditions in particular areas where such GPR assessment may be warranted. The required Quality of Life Compliance Plan will include documentation showing how GE will repair any damage to the roads, other than normal wear and tear, caused by GE in order to allow safe public access during remediation activities. At the completion of any remediation activities affecting a specific road, GE will

document the then-existing condition of the road and associated exposed infrastructure using the same technology as set forth above and provide that documentation for review by the municipality; at that time, GE and the affected municipalities will meet and confer in good faith, and in consultation with experts, regarding the need for the use of GPR technology to assess subsurface conditions in particular areas where such GPR assessment may be warranted. GE shall repair or replace any damage caused by GE.

The City calls out the following statement from the 2020 *Settlement Agreement – Housatonic River, Rest of River*, Page 7, as it relates to opportunities for recreational enhancements on temporary access roads used during the remediation activities:

GE shall work cooperatively with the City of Pittsfield, the Towns of Great Barrington, Lee, Lenox and Stockbridge, and the State of Massachusetts to facilitate their enhancement of recreational activities, such as canoeing and other water activities, hiking, and bike trails in the Rest of River corridor. Such opportunities are possible on properties where remediation will occur and/or where temporary access roads are constructed.

We appreciate the opportunity to provide comments on transportation routes and other considerations in Reach 5A. We look forward to further collaboration on evaluation of routes and development of mitigation strategies that would lessen the possibility of negative impacts to our community.

Sincerely,

A handwritten signature in black ink, appearing to read "J. McGrath". The signature is written in a cursive, flowing style.

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

Mark Pruhenski
Town Manager

E-mail: mpruhenski@townofgb.org
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TOWN OF GREAT BARRINGTON MASSACHUSETTS

OFFICE OF THE TOWN MANAGER

January 30, 2024

Comments emailed to: RIHousatonic@epa.gov

Re: GE-Pittsfield/Housatonic River Site: On-Site and Off- Site Transportation and Disposal Plan, October 2023

Dear EPA:

We applaud and second the many comments submitted to date which encourage more in depth study of rail options as an alternative to trucking options. We are hopeful that rail transportation both on-site and off-site can reduce truck traffic and the environmental and socioeconomic impacts of trucks on our Rest of River (ROR) communities.

Additionally:

1. We believe EPA should require an in-depth analysis of potential safety and health concerns by transportation method, to include analysis of combined truck-rail transport, rail transport, truck transport and hydraulic transport. No quantitative analysis appears to have been done and the communities deserve to know the hazards and anticipated accident rates of each of these three transport options. Also, as this analysis should call out potential health concerns and their planned remediation, the communities should know how potential transport accidents, including potential PCB spills from trucks, rail, or pumping, will be addressed and what, if any, special training, or special equipment, is required for community safety personnel to be able to protect their communities.
2. We recognize that the railroad in Great Barrington nearest Rising Pond has an existing rail siding that could be used as a siding for rail transport of waste on-site or off-site. And we recognize that it may make sense, based on the outcomes of the study we suggest above in item #1, that this siding be used for rail transport for dredge materials from Rising Pond. This would reduce the number of trucks through Housatonic Village, a densely population environmental justice community. However, we do not believe it would be appropriate to utilize this railroad siding as a receiving area for waste dredged from Reach 7. Having dredge materials travel by truck south from Reach 7 to Rising Pond, then be loaded onto a rail car and then sending that truck back north again, would double the truck trips through the village of Housatonic. It would be the exact opposite of achieving environmental and safety benefits through the use of rail. We believe all possible railroad sidings – including those in Stockbridge and South Lee – be investigated, not just one two large sidings.

3. We encourage EPA to require GE to develop an ROR communications network so that community safety, emergency response, and public works personnel can 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. The communities can then also provide information to GE with regard to local conditions including safety concerns, road work, closures, etc.
4. We encourage EPA to require that GE's Adaptive Management Plan include provisions for managing the transportation and disposal options as conditions over the decades-long cleanup evolve. Some changes may be more driven by more mundane occurrences: should a bridge or road fail and an alternate transportation route be needed, how will GE address that? Other changes may be driven by technology: if electric trucks or electric rail become viable, will GE be ready to embrace these technologies which could reduce vehicle emissions even more?
5. While there are few road options available in Lee, it seems inappropriate to route a "potential truck route for off-site disposal" through the center of Lee. This route is already a primary route for many large trucks primarily on their way to, or from, the freeway. More trucks may increase the likelihood of an accident and if one were to occur, it would impact a higher density of population and may have significant socio-economic and health repercussions. We ask the EPA to require GE to update its Plan with other roads, which are in less populated areas and less traveled by other trucks. Representatives of the impacted communities should be consulted regarding all anticipated transport routes before transport routes are finalized.
6. The draft Plan states that the topic of "the potential for spills during on-site transportation...(as it)...will be addressed in the Contingency and Emergency Procedures Plan to be included in the upcoming Project Operations Plan (POP) (to be submitted to EPA by January 25, 2024)." Because the treatment of spills is an important safety concern to us, when the document referenced above is issued, we request the EPA consider a comment period of at least 60 days for thorough public comment on the POP.

Thank you for the opportunity to comment on the transportation plan. And thank you for providing Technical Assistance Services for Communities (TASC) to the Rest of River municipalities.

Sincerely,

A handwritten signature in black ink, consisting of several vertical strokes followed by a horizontal line extending to the right.

Mark Pruhenski
Town Manager



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

R. Christopher Brittain,
Town Administrator

January 30, 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 Transportation and Disposal Plan dated October 31, 2023.

1. Section 1.1

As generator, GE will contract the transporters and disposal facilities. The shipment and disposal of a PCB regulated waste is a “cradle to grave” commitment by the generator. Isn’t GE ultimately responsible for the compliance of their contractors?

2. Section 1.4

At the Town meeting on November 28, 2023, Lee residents expressed strong opposition to the transportation of PCB-impacted soil to the UDF and communicated their preference for transportation to an off-site permitted facility. Residents communicated that the rail-based transportation option was not adequately considered in the T&D Plan including a letter from Parker Rodriguez of the Housatonic Railroad explaining that the rail-based transportation option was viable and cost-effective. Other testimony revolved around the resident safety along the truck passage through the Town center to the Mass Pike. Residents of other affected Towns have provided similar feedback regarding the rail-based transportation option.

The GE team should: 1) formally address residents feedback (Section 1.4 appears to be the most logical section), 2) consider revising the T&D Plan to reduce transportation volume to UDF [and increase transportation volume to off-site permitted facility], 3) provide a more thorough study of the rail-based transportation option, and 4) evaluate use of other routes that avoid downtown Lee to avoid risks to public safety.

3. Section 2.1

Footnote b on page 7 of the Transportation Plan states that “other materials generated during implementation of the ROR Remedial action, such as materials used to build temporary access roads and staging areas, may be disposed of in the UDF.” This statement demonstrates the need to sample the base materials from access roads and staging areas to determine their fate as a potential ROR waste. It would be beneficial if surface materials from these areas could be sampled to determine possible Total PCB content from dust, which is a safety concern to surrounding communities.

The Town would like to know if surface materials from access roads and staging areas could be sampled to monitor Total PCB content in possible dust emissions to determine if there is a concern to surrounding communities and also to determine the ultimate disposal location for these materials.

What is the basis for using 10% of total volume to determine off-site soil volume for other RUs? Is the off-site volume for Reach 5A based on PDI? What category do sediments with volume-weighted average greater than 25 mg/kg (page 5) fall into?

4. Section 2.2

The expanded use of rail-based transportation would affect the selected locations for temporary material handling and staging areas and temporary roads to access those staging areas.

Unless soils are hydraulically conveyed, dewatering at or near the excavation areas may be preferable to staging areas (i.e., to avoid transportation issues related to free liquids).

Some PCBs are volatile and may exist as a vapor in air. This potential exposure pathway should be considered at the staging areas where reworking of soils to dry them or mixing with drying agents (e.g. exothermic reactions) is planned.

Consider reducing the activities conducted at the staging areas to minimize the potential for fugitive PCB emissions and releases at non-PCB impacted locations.

Consider use of other dewatering methods such as: in-situ dewatering of flood plain soils, use of dewatering boxes and/or liners, ex-situ dewatering using filter press, etc.

The Town also requests any available dewatering locations that may coincide with transportations routes (not just for hydraulic dredging).

5. Section 3.1.2

The Town requests further details on the hydraulic pumping system including the following specifications:

- a. size and length of pipe
- b. location of booster pumps
- c. decibels of noise created by the equipment
- d. ratio of solids to liquids
- e. dewatering plan/locations
- f. methods
- g. pressures and flows
- h. spill prevention/response

In addition, we would like to better understand the likelihood that the hydraulic pumping system will be the chosen method of transport and what the alternative trucking impacts would be if it is not utilized.

How will sediments be characterized at the UDF to determine if on- or off-site disposal is appropriate?

Is hydraulic conveyance limited to sediments? If so, how will soils from Reaches 5C and 6 be transported on-site?

6. Section 3.1.3

The Town requests that all transportation of PCB materials, including out-of-state material, be made by railroad. The list below contains locations of existing railroad sidings that could be used as a loading facility:

- a. Lenox Dale – Willow Creek
- b. Columbia Mill – Lee
- c. Greylock Mill – Lee
- d. Onyx Mill – Lee
- e. Stockbridge Train Station - Stockbridge

d. Rising Mill – Great Barrington

e. Glendale - Stockbridge

f. Sheffield – Adjacent to Fire Station

Would the intermodal containers have an “open top” for loading soil?

To reduce truck traffic and soil handling, could staging areas be relocated to existing, reconditioned sidings or could new sidings be constructed to service the planned staging areas?

HRRC’s circa 2020 feasibility assessment should be updated and submitted to Town of Lee for review.

The Town, once again, formally requests a meeting with the EPA and the Housatonic Railroad to further discuss options for transporting PCB materials.

7. Section 3.1.4

A breakdown of the trips (i.e., point of excavation to staging area, staging area to UDF, etc.) and the time and mileage per truck trip for both the truck only and rail options would be helpful/useful.

8. Section 3.2

BOLs or shipping documents should reference a dangerous materials emergency response (i.e., Chemtrec) call center.

Transporters should notify local municipalities and/or Police Departments along the truck travel prior to shipments and provide safety and spill response information.

9. Section 4.1.1

The transportation route through the center of Lee for off-site disposal of Reaches 5B, 5C, and 6 should be reconsidered. It is a developed area with dangerous intersections.

If railroad is not the chosen method of transport for out-of-state materials, the Town of Lee requests considering the use of New Lenox Road/Walker Street to Route 7 (south) to Route 102 (east) to Mass Pike (west) as alternate (concept figure attached). All out-of-state materials should enter I-90 by going south to MA-102 West to join I-90 in New York and avoid the more densely populated areas of downtown Lee.

The Town of Lee insists that highly toxic materials that will be transported to an out-of-state facility NOT be transported through Main Street in Lee since this area contains the highest population density of any potential out-of-state route.

This area is also currently on the Mass DOT TIP program due to the number of traffic accidents as shown below:

(LEE- INTERSECTION IMPROVEMENTS AT PARK STREET AND MAIN STREET (ROUTE 20). This project will convert the three-leg intersection of Main St, Park St, and West Park St in Lee to a modern roundabout. Work will include reconstructing the intersection and each of its approaches for several hundred feet. Improvements to the existing closed drainage system will be made to accommodate the new configuration. Existing sidewalks will tie into the new intersection, new crosswalks will be added, and improved bike accommodation will be implemented (perhaps in the form of a shared-use or side path). Construction Begins: Summer 2027. This project is planned to be funded through the 2027 Transportation Improvement Program for the Berkshire Metropolitan Planning Organization. This project is in the preliminary design phase.

10. Section 4.1.2

To reduce truck traffic and soil handling, could staging areas be relocated to existing, reconditioned sidings or could new sidings be constructed to service the planned staging areas?

11. Section 4.2

BOLs or shipping documents should reference a dangerous materials emergency response (i.e., Chemtrec) call center.

12. Section 6

Safety concerns related to ROR waste materials transportation are of principal interest to the community. The Transportation Plan does not include a quantitative analysis of increased traffic safety issues that would be expected using the different methods of transportation (rail, truck or a blend of both) for Reach 5A such as vehicular accidents, operator accidents and spills. It may be useful to the community to understand the anticipated incidence of traffic accidents and other safety concerns (such as waste material spills) by type of transportation method (truck, hydraulic and rail) in order to better understand the safety implications associated with the preferred transportation alternative chosen by GE.

13. The Transportation Plan does not state whether the proposed transportation activities are subject to outside regulatory requirements such as the need to obtain a highway access permit. Highway access permits are required when physical work or activities take place within, or impact, the State Highway Right-of-Way or property owned or under the custody and control of MassDOT-Highway. The authority to issue State Highway Access Permits is covered under Massachusetts General Laws; Ch. 81, § 21 and Ch. 85, § 2. The process and procedures governing the review of State Highway Access Permit applications,

issuance of permits, and their associated fees, are found in the Code of Massachusetts Regulations (700 CMR 13.00). As per review of the State Highway Access Permit System, certain highway permits may require an Environmental Impact Report under Massachusetts Environmental Policy Act (M.G.L. Ch. 30, § 61 through § 62H) and implementing regulations (301 CMR 11.00: MEPA Regulations).

The Town would like to know if the proposed transportation activities described in the Plan will require a highway access permit through MassDOT and, if so, whether the access permit will require an Environmental Impact Report.

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

February 1, 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 Transportation & Disposal (T&D) 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, the all-important process of 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 transportation and disposal plan, a proposal for which General Electric (GE) has submitted through their subcontractor (Arcadis) on October 31, 2023. I and members of my team have thoroughly reviewed the GE/Arcadis proposal and accompanying data submitted. Furthermore, the Town of Lenox has engaged an independent engineering firm (Weston & Sampson) to evaluate the plan. This letter constitutes the Town's response to the Environmental Protection Agency (EPA) as approved by the Lenox Select Board on January 31, 2024 in advance of the formal comment deadline on February 1, 2024.

GENERAL COMMENTS ON TRANSPORTATION AND DISPOSAL PLAN

Acting on behalf of GE, Arcadis submitted their "On-Site and Off-Site Transportation and Disposal Plan" on October 31, 2023. As stated by the Lenox Select Board chair the following day (November 1st), the plan is "woefully inadequate", "left a lot of unanswered questions", and failed to address concerns previously raised by Lenox. Also at that meeting, the Board sought to collaborate with the towns of Lee, Stockbridge, Great Barrington, and Sheffield on a joint response endorsing further exploration of rail transport. On December 20, 2023, the Board approved a joint signature letter to this end along with the aforementioned towns and West Stockbridge. The text of that letter is attached to this filing and has been submitted to EPA under separate cover.

Lenox previously submitted comments regarding GE's preliminary plan on August 31, 2023 in which we urged maximization of hydraulic and rail transport – or at least a detailed explanation of why one or both are not feasible. However, despite the Town's prior entreaties, GE/Arcadis has failed to credibly demonstrate why the expansion of rail transport and hydraulic conveyance will *not* work. Meanwhile, during the same intervening period, Lenox has gone to substantial lengths to show that both options *can* work (see attached technical memorandum). Also, during this time, virtually every stakeholder group, our state and federal legislative delegations, and substantial swaths of the unaffiliated public have agreed with Lenox that rail transport must be utilized to eliminate as much vehicle traffic as possible.

While the paragraph above is intended to provide an even-keeled, constructive description of our ongoing issues, it should not be construed as lacking emotion. Our frustration and bewilderment about the proposal's failure to address our previously raised concerns cannot be overstated. We are *very* frustrated by the lack of responsiveness, and we expect meaningful answers in future proposals.

EXPANDED HYDRAULIC CONVEYANCE – DEPLOY IN CONJUNCTION WITH RAIL

As stated in our comments on GE's preliminary plan, maximizing hydraulic removal/conveyance of material to the Upland Disposal Facility (UDF) is, and has always been, the top priority for Lenox concerning the T&D portion of the clean-up. It is estimated that the plan's use of hydraulic pumping could eliminate nearly 90% of truck traffic in Reaches 5C and 6 (Woods Pond). At the time of our preliminary comments, we speculated that this method could be deployed in all Reaches. Upon further evaluation by Weston & Sampson, we found that our initial assumptions were even more profound than we first imagined. Hydraulic conveyance (pumping through one or more pipes) can be successfully deployed for distances as long as ten miles. By applying the 90% reduction metric across all Reaches, this method would eliminate approximately 26,980 additional truck round-trips (this is in addition to GE/Arcadis assumption that 55,140 truck trips will be eliminated by using hydraulic conveyance for Reaches 5C and 6).

EXPANDED RAIL TRANSPORT

It is gratifying to see our long-held beliefs regarding rail gaining traction in the community – including statements from our legislators and the Housatonic Railroad Company (HRRC) expressing an eagerness to work with EPA and GE to use the state-owned rail line to facilitate both out-of-state and UDF disposal. However, it should be noted that for the non-TSCA-rated sediment bound for the UDF, HRRC's plan does not resolve the “last mile” problem because the contemplated spur terminates at a section of the UDF site inaccessible to the internment area without offering a subsequent conveyance solution. To address this problem, Representative Pignatelli has proposed – and Weston & Sampson corroborate – improving the existing siding area at the historic Lenox train station on Willow Creek Road and constructing a “Bailey” or other bridge structure across the river. This approach would bypass all local residential and commercial areas by moving sediment directly to the UDF via backroads through a mostly undeveloped area. The Select Board supports this solution.

Beyond contaminated sediment, the GE/Arcadis plan makes no provision for moving the large amount of equipment and backfill material that will be necessary to construct project-specific and

permanent/replacement infrastructure. By both monetary and geographic standards, this will be the largest public works project in the history of Berkshire County. Therefore, the impact of importing machinery and other construction-related items will be significant. Lenox and its neighbors need to understand how this will happen. In the absence of a specific plan, we insist that rail be considered to transport such equipment and materials to the maximum extent possible.

CONCLUSION

The GE/Arcadis plan needs to be rewritten and improved in all the areas stated above. While Lenox is pleased to see that the plan includes hydraulic pumping of river sediment in Reaches 5C and 6, we are dismayed to see that our requests regarding expanded pumping and rail transport have gone unheeded. Conversely, we are heartened by EPA's rejection of this plan even before the conclusion of the public comment period. Therefore, 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

MEMORANDUM

TO: Christopher Ketchen, Town Manager, Lenox, MA

FROM: Weston & Sampson

DATE: January 29, 2023

SUBJECT: Weston & Sampson Review of Rest of River On-Site and Off-Site Transportation and Disposal Plan

As requested by the Town of Lenox (“the Town”) Weston and Sampson Engineers, Inc. (“Weston & Sampson”) has reviewed documents relevant to the Housatonic Rest of River Project provided by the Town (“the review documents”). The documents which were included in our review and comment efforts are:

- *On-Site and Off-Site Transportation and Disposal Plan*, Arcadis, October 2023.
- *Conceptual Remedial Design/Remedial Action Work Plan for Reach 5A*, Anchor QEA, September 28, 2023.

To support this technical review, we also referred to the following document for additional information:

- *Comments on GE Pittsfield/Housatonic Rive Site – On-Site and Off-Site Transportation and Disposal Plan, October 2023*, Technical Assistance Services for Communities, January 10, 2024.

In this memorandum, we provide our comments on the planned transportation and disposal of dredged sediments and sediments and soil removed from floodplains during the remediation of the Housatonic River to be performed by GE and their subcontractors after approval from EPA. It is also anticipated that there will be debris located within the removal areas (i.e., river and surrounding floodplains). The sediments, soil, and debris will be referred to as “the materials” in this memorandum.

The information provided in the On-Site and Off-Site Transportation and Disposal Plan (T&D Report) is mostly general in nature and it is indicated that specifics will be provided in Work Plans to be developed for each of the Reach Units (RUs). The Remedial Action Work Plan for Reach 5A indicates that materials will be dredged, transported to a staging area, dewatered and treated, and then trucked to the Upland Disposal Facility (UDF). No use of rail or hydraulic dredging is considered in this report.

The T&D Report does provide estimates of the total volume to be removed from each area and general details on material handling and storage. The Table below (Table 2-1 from the T&D Report) provides estimated volumes for removal as wells as volumes projected for on-site (i.e., at the UDF) and off-site (i.e., appropriately permitted landfill outside Massachusetts) disposal from each of the RUs. Figure 2 from the T&D Report has been modified and is attached. The modifications to Figure 2 include showing the location of the UDF and the approximate location of the Housatonic Railroad. Also attached to this

memorandum are annotated photographs of railroad sidings identified within the area of the dredging project.

Disposal on-site is planned for dredged materials with total polychlorinated biphenyl (PCB) concentrations less than twenty-five milligrams per kilogram (<25 mg/kg) and for materials <50 mg/kg from floodplains or riverbanks. As indicated in Table 2-1, 933,000 CY of material will be dewatered and treated for disposal at the UDF. Off-Site disposal is planned for dredged materials with total PCB concentrations \geq 25 mg/kg and floodplain or riverbank materials \geq 50 mg/kg. These materials will be transported to a disposal facility permitted to accept these wastes and a total of 100,000 CY is projected for disposal in this manner.

Table 2-1: Summary of Conceptual Estimated Removal Volumes

Reach	Estimated Removal Volume (CY) ^a	Estimated On-Site Disposal Volume (CY) ^b	Estimated Off-Site Disposal Volume (CY)
5A	138,700	130,200	8,500
5B	16,000	14,000	2,000
5C	387,000	348,000	39,000
6	285,600	256,600	29,000
7	118,000	106,000	12,000
8	87,000	78,000	9,000
Total	1,030,000	933,000	100,000

Notes:

^a All quantities are preliminary estimates, are rounded, and are subject to change during final design. All volumes are in-situ "neat-line" estimates in cy except that the estimated removal volume for Reach 5A includes an assumed 10% increase over the estimated "neat" volume for the main channel sediment removal to account for uncertainties.

^b In addition to the material removed from remediation areas, other materials generated during implementation of the ROR Remedial action, such as materials used to build temporary access roads and staging areas, may be disposed of in the UDF. Such materials are not included in the on-site disposal volumes given in this table.

Outside of the scope of the T&D Report but still important to the local communities will be transport plans for materials used to construct the UDF and other materials used to restore removal areas. The transport of these materials represents a potential for more trucks on the local roads for the duration of the project and should be accounted for in the preparation of truck estimates.

Comments on Storage and Handling

The T&D Report indicates that access agreements will be negotiated prior to construction of staging areas that will be placed along the river as needed. Haul roads will be constructed so that materials can be transported in water-tight containers to the staging areas where the materials will be dewatered and treated prior to transport to the on-site or off-site disposal facilities. It is assumed that additional access agreements will be required for construction of the haul roads.

The construction of multiple staging areas and haul roads will require removal of trees and vegetation and grading to create a working space. As such, this damage to the environment should be managed appropriately (e.g., installation of sediment and erosion controls, maintenance to prevent creating or tracking mud). If areas are cleared and graded for use in the remediation, it is requested that GE work with the municipalities where this construction is completed so that these cleared staging areas and haul roads could be converted into parks and hike and bike trails after they have been decontaminated, if desired.

Use of trucks to transport dewatered and treated sediments is a concern to the community because of the risk of accidents with the greater traffic load with slow moving vehicles. There are also the nuisance issues with noise, traffic congestion, and potential releases from the trucks. Dependence upon haul roads to move dredged materials to staging areas is also complicated by the fact that, in some locations along the Housatonic, there is development close to the river on both sides or grades that could prevent the construction of roadways sufficient for the project. Reliance on haul roads may not always be feasible.

As seen on Table 2-1, nearly 65% of the total volume of planned removal materials will be from RUs 5C and 6. These RUs are located immediately to the north of the UDF (see the attached modified Figure 2 from the T&D Report) and there is mention in the report that hydraulic dredging will be considered for use and employed, if feasible, in these RUs. Table 3-1 in the T&D Report indicates that an estimated total of 590,000 CY will be conveyed by hydraulic conveyance, if feasible. This represents approximately 88% of the total volume to be removed from these two RUs and the use of hydraulic dredging and conveyance creates a potential for a large reduction in trucks used to move dredged sediments.

Use of hydraulic dredging and conveyance measures could greatly reduce truck traffic as sediments dredged in this manner could be moved to centralized staging areas. The use of centralized staging areas could reduce the number of staging areas and haul roads to be constructed and would limit the damage to the environment and the number of access agreements required. In addition, it would reduce the number of off-road trucks required to move sediments from the dredging locations to staging areas.

It is assumed that the materials hydraulically conveyed from RUs 5C and 6 would be pumped to the UDF where the materials would be dewatered and treated prior to final internment in the UDF. Conveyance of the dredged materials to the UDF will greatly reduce truck traffic in the area as dredged materials will be conveyed directly to the UDF for processing. Looking at modified Figure 2, most of the RUs along the northern section of the Housatonic River dredging project are within five miles of the UDF and hydraulic dredging and conveyance can be used over this distance and longer. It is requested that GE do further evaluations of the feasibility of hydraulic dredging and conveyance of dredged materials to the UDF from these northern reaches as this would further reduce required truck traffic and greatly limit the need to construct haul roads and staging areas.

At the southern end of the planned dredging operations is the Rising Pond Dam. A railroad spur ran from the Housatonic Railroad to the dam but has been removed. However, the path of this spur is still cleared, and this clearing could be widened and improved so that it could be used as a haul road with limited damage to the environment. In addition, there is sufficient unused land at this location to construct a large staging area for use in dewatering and treating sediments. Once the dredged materials are treated, they could be transported along the haul road up to the rail line. There is a railroad siding at this location nearly a mile long that could be sufficient for the handling of multiple railcars to transport the treated sediments to the UDF (see attached photographs).

Looking at the modified Figure 2, most of the RUs along the southern section of the Housatonic River dredging project are within five miles of this rail siding. It is requested that GE do further evaluations of hydraulic dredging and conveyance of dredged materials to this location for staging, processing, and eventual rail transport to the UDF. Again, this would greatly decrease the need for off-road and on-road trucking of dredged materials and decrease the need for construction of staging areas and haul roads. There are other sidings along the Housatonic Railroad that could be used for the temporary storage of rail cars holding dewatered and treated sediments (see attached photographs).

Dredged materials from the southern RUs could be transported via rail to the Lenox station located across the Housatonic from the planned location of the UDF. To access the UDF from this location, GE could negotiate access with the owners of river crossings or use public roads, but this would create a

large amount of truck traffic on public roads in this area. It is requested that GE evaluate the construction of a bridge from the Lenox Station over to the location of the UDF to facilitate the movement of materials to the UDF with the least amount of impact to the surrounding communities.

Construction of the UDF will also require the transport of materials and equipment to the site that will create a large amount of truck traffic in the area. However, if access from the Lenox Station to the UDF was constructed, GE could transport materials and equipment to the location via rail and use the same constructed access which would also limit the impact to the local community.

Not all of the dredged materials can be hydraulically conveyed and the continued use of trucks to move some materials is anticipated. It is expected that natural debris (e.g., large tree limbs or rock too large for pumps in the hydraulic conveyance lines) and garbage (e.g., used tires) will be encountered in the dredged materials and that the debris will need to be segregated and transported separately in trucks. In addition, materials dry enough to directly load into trucks may be found in floodplain areas. Thus, it is not anticipated that the use of trucks can be fully eliminated. Further evaluation beyond that currently provided, could be performed to greatly reduce the number of trucks needed to transport materials to the UDF and for off-site disposal. It is recommended that GE fully evaluate any trucking routes to be used for safety concerns and to minimize the impact to the local community.

Summary

The use of hydraulic dredging and conveyance could greatly reduce the use of trucks both off-road and on-road. GE has indicated that they plan to evaluate the feasibility of these methods for use in RUs 5C and 6. However, it may be feasible to use the same hydraulic methods in other RUs and this would benefit the local communities by reducing the impacts due to truck traffic which could pose safety hazards and pose an excess nuisance to community members due to noise, congestion, and potential releases.

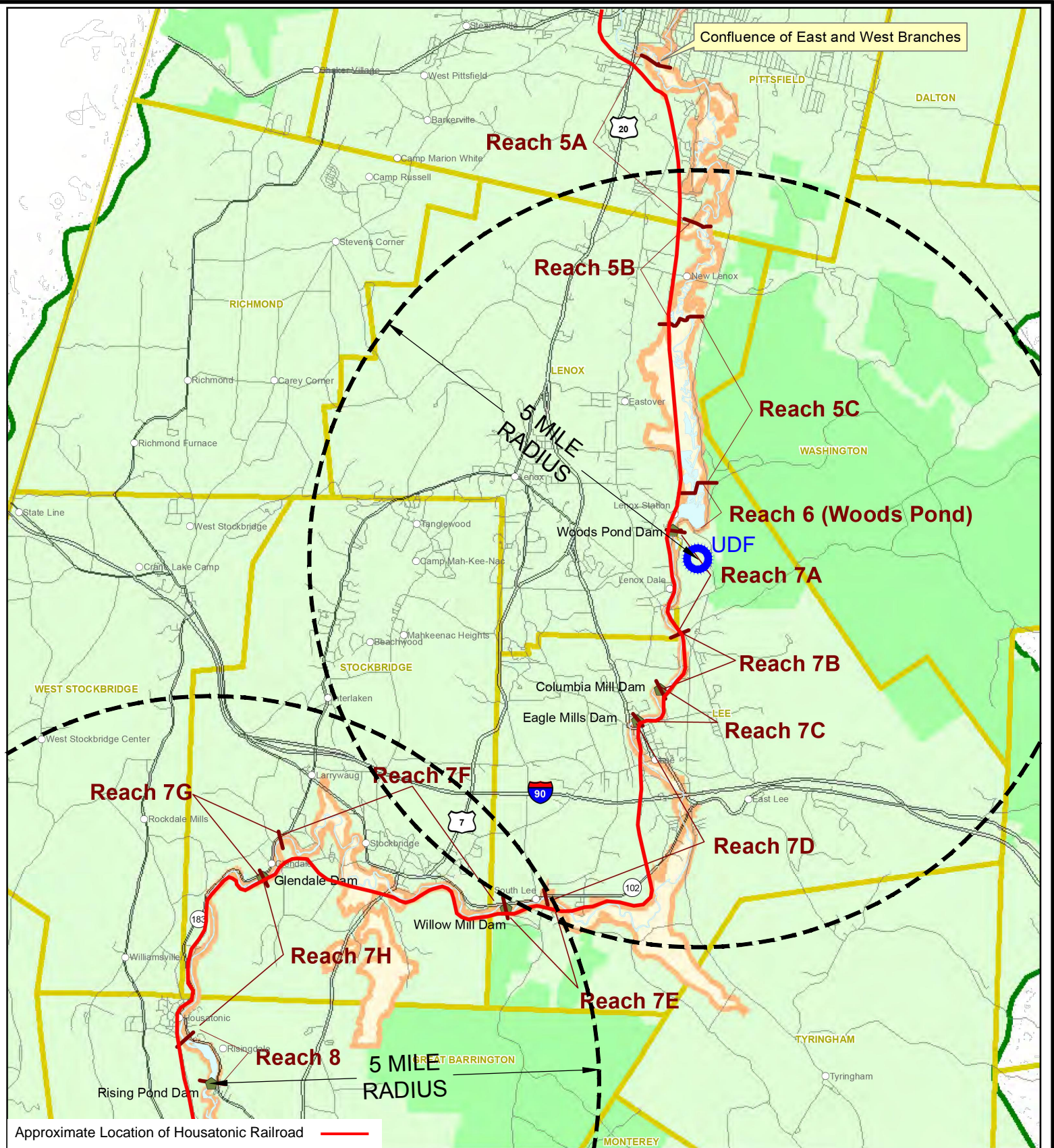
If hydraulic dredging and conveyance is found to be feasible for multiple reaches, this could also reduce the need to construct haul roads and staging areas for dredged materials. The construction of haul roads and staging areas will require the clearing of trees and vegetation and grading to make the areas workable. Reducing the number of staging areas and haul roads will lessen the damage to the environment in this manner.

Materials removed from northern RUs could be pumped directly to the UDF which could greatly reduce the need for both off-road and on-road trucking. Materials removed from the southern RUs could be pumped directly to a staging area created near the Rising Pond Dam. A railroad siding exists at this location which could be used to facilitate the movement of treated sediments to the UDF via rail.

The Lenox Station is located across the Housatonic River from the proposed location of the UDF. If a crossing was constructed at this location, treated sediments could be moved from the station directly to the UDF which would lessen the impacts to the community at this location. This crossing could also be used to transport equipment and materials required to construct the UDF directly to that location which would also lessen the impacts to the community.

Not all trucking of materials can be eliminated. However, for any trucking required, it is requested that GE do further evaluation of trucking routes to evaluate the safety concerns and to limit the impact to the local communities.

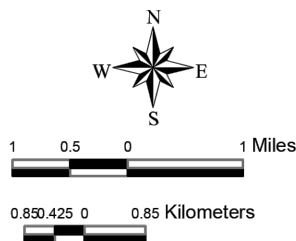
For any areas that are cleared and graded for use (i.e., staging area and haul roads), it is requested that GE work with the municipalities as these locations have potential for future use as parks or hike and bike trails. It is assumed that GE would remove materials and equipment installed at these locations and complete any decontamination of these work areas prior to their conversion to public use.



Approximate Location of Housatonic Railroad ———

LEGEND:

- Town/City
- Housatonic River
- Roads
- State Park
- Reach Division Line
- Municipal Boundary
- 10-Year Floodplain



GE- Pittsfield/Housatonic River Site
Rest of River

FIGURE 2
HOUSATONIC RIVER,
PRIMARY STUDY AREA
(REACHES 5 AND 6) AND
REACHES 7 AND 8



Approximately 0.85 miles of railroad siding along Van Deusenville Road, Great Barrington, near Reach 8.



Gravel area (approximately 0.55 acres) adjacent to Reach 8 railroad siding provides access to Housatonic River.



Pathway of historic railroad siding from Van Deusenville Road, Great Barrington, to Housatonic River (approximately 1,500 feet).



Rising Pond Dam – Access point to Housatonic River from Van Deusenville Road, Great Barrington, railroad siding in Reach 8.



Approximate 800 foot spur of railroad siding to the Onyx Specialty Paper facility located at 1075 Pleasant Street, Lee, along Reach 7D.



Area surrounding railroad siding to the Onyx Specialty Paper facility located at 1075 Pleasant Street, Lee, along Reach 7D.



Approximately 0.50 miles of railroad siding adjacent to the Berkshire Scenic Railway Museum in Lenox near Reach 6.



Pedestrian bridge crossing Housatonic River in Reach 6, approximately 3,000 feet north of the Upland Disposal Facility.



View looking to the southwest of the Upland Disposal Facility along Reach 7A.



Approximately 0.47 miles of railroad siding adjacent to Industrial Drive in Pittsfield, north of Reach 6.



***Town of Sheffield
Select Board***
***Town Hall – 21 Depot Square
Sheffield, Massachusetts 01257***

***Voice: 413-229-7000
Fax: 413-229-7010
TTY: 800-439-2370***

January 25, 2024

Comments emailed to : R1Housatonic@epa.gov

Re: GE-Pittsfield/Housatonic River Site: On-Ste and Off- Site Transportation and Disposal Plan, October 2023

Dear EPA:

The Town of Sheffield Select Board, representing the most downstream of the five Housatonic Rest of River Communities, respectfully submits the following comments on the above referenced Plan.

First, we continue to be grateful and appreciate EPA's provision of Technical Assistance Services for Communities (TASC) and the comments SKEO has provided on this Plan. Their report is attached.

The Select Board understands the importance of this Plan and that it is focused primarily on establishing transportation procedures for Reach 5A materials to both the Upland Disposal Facility and out-of-state locations. However, we are concerned the procedures approved in this Plan, or an amended Plan, will become the de-factor transportation procedures for the entire Rest of River cleanup. We therefore urge the EPA to review this GE Plan with its usual care, with that focus in mind, and insist on Plan revisions where required.

Also, while transportation and disposal activity final details are to be presented in future documents on a specific Remediation Unit basis, all on-site and off-site transportation and disposal plans should be consistent with the Settlement Agreement, and seriously consider community feedback, anticipated socio-economic costs, quality of life, and available in-place roads and rail lines. To date, the Housatonic Railroad Company's corporate counsel, Parker Rodriguez, has made several public statements in support of working with the EPA and GE in coming up with a rail based transportation plan, while community members have been universal in support of rail transport, while unsupportive of truck transportation.

While the Settlement Agreement contains specific language dealing with truck transportation on municipally owned roads, it would be a serious error to assume that parties to the Settlement Agreement were only focused on this mode of transportation. Rail was not specifically discussed in the Settlement Agreement as none of the Rest of River municipalities own rail lines. The extensive documentation on road transport was to make sure that GE was responsible for the repair of any damage caused when truck traffic used roads for the transportation of any PCB related cleanup materials. Without this careful language in the Settlement Agreement, each of the municipalities impacted by such truck transport would have had to repair their roads at their taxpayers' expense.

Finally, it is unfortunate that GE has chosen to segment several of the topics a reasonable person would expect to see in this Plan. See comments #s 4,8,9,10 and 16. We find this disconcerting as it requires additional work by the public and the EPA in putting integrally related topics together in what should be

in a single, unified Plan. We respectfully ask the EPA to require a revised Plan to include all of these segmented topics.

Our comments:

1. The EPA should require an in-depth analysis of potential safety and health concerns by transportation method, to include analysis of combined truck-rail transport, rail transport, and truck transport. No quantitative analysis appears to have been done and the communities deserve to know the hazards and anticipated accident rates of each of these three transport options. Also, as this analysis should call out potential health concerns and their planned remediation, the communities should know how potential transport accidents, including potential PCB spills, will be addressed and what, if any, special training, or special equipment, is required for community safety personnel to be able to protect their communities. We believe the EPA is aware that many firefighters in the cleanup communities are volunteers.
2. Has the proposed transportation Plan been reviewed, commented upon, and initially coordinated with the Commonwealth's agencies, and associated companies, tasked with the issues raised in the Plan? Specifically have MassDOT and the Housatonic Railroad Company weighed in on the Plan, and potential transportation options? We do not know if the owner of the railroad tracks has been consulted on this Plan. If not, we hope the EPA will seek such review and comments.
3. It is unclear if the activities proposed in the Plan are subject to outside regulatory permits for work within various Right-of-Ways, may require access permits, and in general are governed by applicable MA General Laws, including required environmental impact documents. This should be clarified, as it may have an impact on the transportation options under consideration.
4. While comments on the Quality of Life Compliance Plan are not due to Friday 3/29/24, the Plan clearly has Housatonic Rest of River communities and their residents greatly concerned. The Settlement Agreement calls for active and ongoing Community consultation and input on every aspect of the cleanup. This Community consultation needs to begin now, with the EPA and GE rather than the communities in the lead. Given EPA's history with numerous cleanups, EPA knows more than the communities about issues that will likely come up as the cleanup proceeds. Such issues are best discussed with the communities before they come up. The Rest of River Communication Network and safety training cited by Skeo, and by this Board in #1, needs to get underway in the very near term.
5. While GE has proposed a single community liaison, yet to be identified, it is a positive first step. We believe more than one community liaison will be required, and these liaisons need to be identified and begin community conversations as soon as possible. This ties in with #4 above, and we encourage EPA and GE to work with each of the Rest of River communities, Pittsfield, and any community, such as West Stockbridge, through which PCB materials will be transported. We believe representatives from each such community are ready to begin ongoing, regularly scheduled discussions with GE's liaisons. They may also develop the required organizational / communication structure to facilitate community input, on-going community communications, and specific details as the cleanup process is finalized and implemented.

6. Reiterating #1, while GE's Plan supports truck transport as their preferred transport for all transport of PCB materials, this is not in keeping with overwhelming community desires. Though the Plan mentions other transport options, the Plan is insufficient in providing a reasonable analysis of these alternatives. The pros and cons of each alternative must be provided to the EPA, as well as to the public. The EPA should demand an analysis of each alternative transport option to cover the key issues of community, health and safety, climate, wildlife, health, costs, implementation concerns, etc.
7. While the submitted Plan purports to address earlier concerns and comments of the Housatonic Rest of River communities, we challenge that assertion. As evidenced by community called meetings with the EPA and the CCC, Select Board meetings, letters to the Editor of the Berkshire Eagle, and other community actions, we believe GE's assertion to be gravely inaccurate. While the Settlement Agreement included various parties, including the Select Boards of the five Housatonic Rest of River communities, that did not constitute addressing prior comments nor has GE specifically addressed ongoing community comments since 2020, when the Settlement Agreement was announced. Unfortunately, such a comment, if not substantiated in revisions to this Plan may negatively impact the community relationships needed for a successful cleanup process.
8. The Plan appears to not consider best management practices for construction activities in view of and immediately adjacent to traffic areas. Implementation of such best management practices would likely help reduce or eliminate accidents. GE should be required to amend its Plan to include these and address traffic safety where construction activities and the like are adjacent to traffic areas.
9. A significant amount of time was spent on sampling – techniques, distances between, depth, areas to be sampled, etc. – in arriving at the Settlement Agreement and the new Permit. We find it remarkable that this Plan lacks necessary sampling details, such as the sampling agreed to be done, to accurately determine the amount and type of PCB waste materials to be disposed of either in the Upland Disposal Facility or transported out of state. Previous sampling studies are in some cases decades old and may not provide an accurate assessment of current PCB contamination levels, distribution, or required remediation. We urge the EPA to require GE to amend the Plan to accurately address required sampling, including how they plan to assess/verify PCB materials to be removed from each Reach and Remediation Unit, the PCB contents of each sample (and aggregate sampling where allowed), and the disposal destination of such PCB waste materials. We appreciate SKEO's conservation recommendations "to conduct both Aroclor- and congener-based Total PCB analysis to ensure the most conservative estimates of Total PCBs are obtained (Aroclor-based analysis provides results for only select groups of PCBs while congener-based provides results for all PCB chemicals). This sampling will ensure that the disposal location chosen for each batch of materials is appropriate, given that each batch's PCB concentration will determine whether that batch is disposed of on-site or off-site."
10. GE is required to describe "such procedures for an off-site disposal facility or facilities, and an on-site transportation and disposal plan." (Skeo TASC p.6, #11) These are not described in this Plan but cited as being in the Conceptual RD/RA Work Plan, the Final Plan of which has not been received. Another instance of GE's segmentation of required information and to be provided in the future. The "appropriate treatment process" of decanted water from sediment waste materials" raises concerns as is whether the water itself will be considered a "hazardous waste",

and if so, how will it be handled. The EPA would serve the public well, and possibly itself, by requiring this important information to be in an amended Transportation Plan, rather than a Final RD/RA Work Plan.

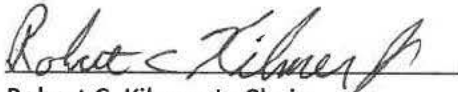
11. The TASC report states that "Section I (pdf page 81) of the Revised Permit defines the ROR Schedule" (and states) "Implementation of the Corrective Measures shall begin concurrently, if feasible. Permittee shall begin such concurrent implementation in Reach 5A (sediment and Floodplain) and Woods Pond, unless Permittee proposed, and EPA approves an alternate approach. ... Corrective Measures shall proceed downstream from Reach 5A and Woods Pond on a parallel track." (TASC p. 6) While there have been extensive prior discussions on the possibility of concurrent cleanup in several Reaches, we do not know if the impacted communities have been consulted on this, or if they have had adequate time to provide their collective input to the EPA. Exactly how such concurrent activities would be scheduled or accomplished is not stated. The Plan does not describe how Reach 5A and Woods Pond corrective measures would be accomplished concurrently. If these two areas are to be addressed concurrently, then there are traffic patterns that will need to be coordinated. As we believe the final Transportation Plan from GE will become the default transportation plan for the rest of the cleanup, we urge the EPA to insist it be as complete, comprehensive, and clear as possible. A lack of specific transportation plans, timing of transit activities, how schedules will be coordinated for cleanup activities, etc. should not be permitted. This is one of many situations in the Plan where critical information is not provided to the EPA, nor the public. We request the EPA require these specifics to be added to a revised Transportation Plan and that the public have a separate and adequate opportunity to review and comment upon GE's revised Transportation Plan.
12. The EPA and GE should acknowledge, and include in any plans, the possibility of demographic changes during the anticipated 13 year+ Rest of River cleanup. Reviewed transportation routes may change during this period, including impacts by climate change, more/less congestion, required repairs, increased population density. One or more of these changes will likely require evaluation and possible modifications to the Plan. If this is not planned as a component of the Transportation Plan, we request it be added.
13. While the road situation is less than ideal in the Town of Lee, it seems inappropriate to route a "potential truck route for off-site disposal" through the center of Lee. This route is a primary route for many large trucks primarily on their way to, or from, the freeway. This may increase the likelihood of an accident and if one were to occur, it would impact a higher density of population and may have significant socio-economic and health repercussions. We ask the EPA to require GE to update its Plan with other roads, which are in less populated areas and less traveled by other trucks. Representatives of the impacted communities should be consulted regarding all anticipated transport routes before transport routes are finalized.
14. The Board respectfully request the EPA review and document best management practices resulting from all aspects of the cleanup at the 1½-Mile Reach of the Housatonic River, completed in 2006. These should be discussed with the public and applied where appropriate to the Rest of River cleanup. A portion of the Housatonic River was successfully remediated, and we should collectively learn from that endeavor.
15. We do not recall the Upland Disposal Facility being envisioned as a catch all disposal site for "other materials generated during implementation of the ROR Remedial action, such as

materials used to build temporary access roads and staging areas, may be disposed of in the UDF”, as cited in Footnote b. (TASC p.7) Footnote b on page 7 of the Plan requires further explanation as to what are the “other materials generated”, their composition sampled, the public made aware of these results and asked for comments. This was not agreed to in the Settlement Agreement where the only contents agreed upon for disposal in the Upland Disposal Facility were to be PCB waste materials of certain ppm contamination. We believe this is a GE expansion of the facilities usages, and we hope the EPA will not allow this GE statement to go unchallenged.

16. In the submitted GE Plan, GE has deferred addressing the topic of “the potential for spills during on-site transportation...(as it)...will be addressed in the Contingency and Emergency Procedures Plan to be included in the upcoming Project Operations Plan (POP) (to be submitted to EPA by January 25, 2024).” (TASC p.7). The treatment of spills is an important safety concern to the collective community. When this topic is addressed in the document referenced above, it will be important to allow the public to have adequate time to comment on the document. While we believe 30 days is the norm, we request the EPA consider a comment period of at least 60 days. This is unfortunately another example of GE’s segmentation of the Transportation Plan.

Thank you for receiving our comments and the attention we know you will give them.

Sincerely,


Robert C. Kilmer, Jr, Chair


Nadine A. Hawver, Clerk


Rene C. Wood, Member

Enclosure: TASC Comments on GE-Pittsfield/Housatonic River Site – On-Site and Off-Site Transportation and Disposal Plan, October 2023



Technical Assistance Services *for* Communities
GE-Pittsfield/Housatonic River Site
Comments on On-Site and Off-Site
Transportation and Disposal Plan
January 10, 2024

Contract No.: 68HERH21A0018

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

Technical Direction: R1 2.9.14 GE Pittsfield

**Technical Assistance Services for Communities (TASC)
Comments on GE-Pittsfield/Housatonic River Site – On-Site and Off-Site Transportation
and Disposal Plan, October 2023**

Introduction

This document provides TASC comments on the GE-Pittsfield/Housatonic River – On-Site and Off-Site Transportation and Disposal Plan (Transportation Plan). This document is for the Berkshire Regional Planning Commission (BRPC); the city of Pittsfield; the towns of Lee, Lenox, Stockbridge, Great Barrington and Sheffield; Massachusetts Audubon; Berkshire Environmental Action Team and other entities to use as they develop comments to share with the U.S. Environmental Protection Agency (EPA). TASC does not make comments directly to EPA on behalf of communities. This document is funded by EPA’s TASC program. The contents do not necessarily reflect the policies, actions or positions of EPA.

Pursuant to the Revised Resource Conservation and Recovery Act (RCRA) Permit Modification (Revised Final Permit) issued by EPA to the General Electric Company (GE) on December 16, 2020, for the Rest of River (ROR) portion of the GE-Pittsfield/Housatonic River site, GE developed and submit a Statement of Work (SOW) specifying the deliverables and activities that GE will conduct to design and implement the ROR Remedial Action. In accordance with that requirement, GE submitted a Final Revised Rest of River Statement of Work on September 14, 2021. Section 4.3.1.1 of the Final Revised SOW stated that GE would prepare two transportation and disposal plans – an Off-Site Transportation and Disposal Plan and an On-Site Transportation and Disposal Plan. After consultation with EPA, GE has combined these two plans into a single document, the On-Site and Off-Site Transportation and Disposal Plan.

The Transportation Plan details the procedures for transporting and disposing of sediment, soil and debris (collectively “material”) anticipated to be removed during the implementation of the ROR Remedial Action.

Summary

The October 2023 Transportation Plan has eight sections:

- Introduction
- Characterization of Materials for Disposal
- On-Site Transportation and Disposal
- Off-Site Transportation and Disposal
- Community Assessment and Mitigation
- Health and Safety
- Summary of Next Steps
- References

The purpose of the Plan is to establish procedures to be used for transportation and disposal of material from Reach 5A to the Upland Disposal Facility (UDF) area and off-site disposal locations. The Plan includes more general information related to proposed transportation and disposal activities for Reaches 5B, 5C, 6, 7 and 8. Final details regarding transportation and disposal activities will be presented on an RU-specific basis in subsequent documents. The development of the Plan considered several factors including efficient modes of transportation and routes of travel, professional judgement, experience on other similar projects and community input.

Final modes of transport and the associated final transportation routes to the UDF will be identified on an RU-specific basis in the Final RD/RA Work Plans or Supplemental Information Packages (SIPs) for the RUs.

The Transportation Plan includes the following anticipated conclusions for On-Site Transportation and Disposal:

- Transportation by truck for the following:
 - Reach 5A to the UDF
 - Reach 5B to the UDF
 - Reaches 5C and 6 soils to the UDF
- Transportation by hydraulic conveyance, if feasible
 - Reaches 5C and 6 sediment to the UDF

The Plan includes the following conclusions for Off-Site Transportation and Disposal:

- Transportation by truck or to an existing off-site commercial rail loading facility for long-distance transport to the disposal facility/facilities by rail:
 - Reach 5A

For all other RUs, the evaluation of transportation by truck or railroad will be presented on an RU-specific basis at a later time in subsequent design documents.

TASC Comments

The On-Site and Off-Site Transportation and Disposal Plan (Transportation Plan) presents the proposed approach to transport ROR waste materials to both on- and off-site waste disposal facilities. The document provides a summary of the three possible transportation methods (truck, hydraulic and rail) that were evaluated. The document was released and linked with information provided in the Conceptual Remedial Design/Remedial Action Work Plan (Conceptual RD/RA Work Plan) for Reach 5A. The Transportation Plan is of particular interest and concern to the community because there are safety concerns associated with the transport of hazardous waste. In general, the Transportation Plan fulfills the requirements set forth within the Statement of Work (SOW) and Revised Final Permit. TASC comments focus on recommendations to enable community involvement and monitoring of ROR traffic and safety. In addition, TASC identified comments based on the review of the Plan by other applicable agencies and adherence to possible highway access permit requirements.

1. Safety concerns related to ROR waste materials transportation are of principal interest to the community. The Transportation Plan does not include a quantitative analysis of increased traffic safety issues that would be expected using the different methods of transportation (rail, truck or a blend of both) for Reach 5A such as vehicular accidents, operator accidents and spills. It may be useful to the community to understand the anticipated incidence of traffic accidents and other safety concerns (such as waste material spills) by type of transportation method (truck, hydraulic and rail) in order to better understand the safety implications associated with the preferred transportation alternative chosen by GE.

The community may want to ask EPA if the Plan can be revised to include an analysis of safety concerns by type of transportation method (rail vs. truck vs. a blend of methods).

2. It is important that the Transportation Plan be reviewed by transportation professionals such as safety and engineering staff associated with the Massachusetts Department of Transportation (MassDOT) and the Housatonic Railroad Company, Inc. (HRRC). As per information provided in the document (see section 3.1.3 on pdf page 21), GE has worked with HRRC to determine if a railroad siding (a second set of tracks off the main track line where train cars are staged) to the Upland Disposal Facility (UDF) property is a viable project/component to the Transportation Plan. However, it is unclear whether HRRC and MassDOT are reviewing the Plan in its entirety and/or if they have provided any foundational guidance that may have led to this document.

The community may want to ask EPA if the Transportation Plan has been reviewed and coordinated with area traffic agencies such as MassDOT and the HRRC.

3. The Transportation Plan does not state whether the proposed transportation activities are subject to outside regulatory requirements such as the need to obtain a highway access permit. Highway access permits are required when physical work or activities take place within, or impact, the State Highway Right-of-Way or property owned or under the custody and control of MassDOT-Highway. The authority to issue State Highway Access

Permits is covered under Massachusetts General Laws; Chapter 81, Section 21 and Chapter 85, Section 2.¹ The process and procedures governing the review of State Highway Access Permit applications, issuance of permits, and their associated fees, are found in the Code of Massachusetts Regulations (700 CMR 13.00). As per review of the State Highway Access Permit System, certain highway permits may require an Environmental Impact Report under Massachusetts Environmental Policy Act (M.G.L. c. 30, §§ 61 through 62H) and implementing regulations (301 CMR 11.00: MEPA Regulations).

The community may want to ask EPA if the proposed transportation activities described in the Plan will require a highway access permit through MassDOT and, if so, whether the access permit will require an Environmental Impact Report.

4. Large scale remedial action projects involving transportation of hazardous waste pose safety concerns to surrounding communities. It may be prudent to establish a “community safety” watch group that includes community safety leaders such as members from area fire districts, police, area hospitals and health providers. These safety professionals should 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. The existence of this safety network may help assist with community safety concerns (example: West Lake Superfund Site).

The community may want to ask EPA if GE can include or develop a ROR communications network to connect area community safety members to ongoing remedial action activities in order to better prepare for any potential emergency situation.

5. GE proposed to identify a single community liaison as part of their community outreach. This is an important foundational step to creating a continuous method of outreach. It is recommended that an initial task set forth for this individual should be to seek out representatives from each residential area to form a ROR-wide community network, or to coordinate with an existing group. This group would then better represent the different communities throughout the ROR area (i.e., Lenox, city of Pittsfield, etc.).

The community may want to ask EPA if the community liaison could be tasked to develop a ROR-wide community network comprised of individuals throughout the ROR area.

6. Continuing from the previous comment, if a “community network” is formed it may be appropriate to identify strategic community members who can convey concerns or issues as they arise during remedy implementation. If initial concerns can be identified prior to the start of remedy activities, responses to those concerns potentially can be integrated into the cleanup. For example, if truck speed is a concern, GE can place a “speed monitor” to record truck speeds and ensure they are following local traffic laws. Repercussions for lack of following local traffic laws can be communicated to drivers to help ensure safety.

¹ Located at: <https://malegislature.gov/Laws/GeneralLaws/PartI>

The community may want to identify and articulate initial concerns or potential concerns so that opportunities to address these issues can be discussed.

7. The conclusions drawn within the Transportation Plan identify the use of trucks as the preferred transportation alternative for both on- and off-site transportation of ROR waste materials. Other alternatives such as hydraulic and rail (or a blend of methods such as trucks and rail) are also presented, however the pros and cons of these alternatives are not thoroughly described. It may be useful to the community to see the analysis of impacts for each type of proposed transportation method in a summarized format (tables summarizing impacts to wildlife, aesthetics, air and water quality; climate change impacts such as greenhouse gas emissions; cost and time-line requirements, etc.).

The community may want to ask EPA if a summary analysis of the different types of transportation could be provided and if this summary could address impacts such as safety, wildlife, quality of life variables such as noise, air pollution and aesthetics, air and water quality, climate change, cost and ROR remedial action time-line requirements.

8. The Transportation Plan says that it accommodates previously provided community concerns and comments. It may be useful to the community for GE to specifically summarize the community comments and describe their approach to address each concern.

The community may want to ask EPA if the Plan can be amended to include a response to comments discussion in order for the community to understand how their concerns are being addressed.

9. Construction activities immediately adjacent to traffic areas can cause distractions to drivers. It may be appropriate for GE to implement best management practices (BMPs) such as visibility screens to address these concerns. There is no mention within the Plan as to whether GE will implement any best management practices to control possible safety issues.

The community may want to ask EPA if the Plan can be amended to include a discussion of BMPs to address traffic safety issues.

10. The entire disposal process for removed waste materials (sediment, riverbank soils and floodplain soils) was defined based on total PCB analysis data gathered from previous studies. This is an appropriate method in order to be able to scope the intended disposal methods, however there is no mention of whether occasional sampling will be conducted to verify foundational total PCB content assumptions as the media is removed. It seems appropriate to take samples of distinct types of media (for instance, riverbanks soils) from known contaminated areas to determine if the measured PCBs match the assumed PCB levels and therefore are being disposed of in an appropriate way. Furthermore, it would be appropriate to conduct both Aroclor- and congener-based Total PCB analysis to ensure the most conservative estimates of Total PCBs are obtained (Aroclor-based analysis provides results for only select groups of PCBs while congener-based provides results for

all PCB chemicals). This sampling will ensure that the disposal location chosen for each batch of materials is appropriate, given that each batch's PCB concentration will determine whether that batch is disposed of on-site or off-site.

The community may want to ask EPA if the Transportation Plan should include a description of the sampling (if any) to be conducted to verify total PCB content of waste material, in order to ensure proper disposal of waste materials; and if this sampling could include both (occasional) Aroclor- and congener-based Total PCB analysis methods.

11. As specified within the Revised Final Permit and SOW, the Transportation Plan is to describe "such procedures for an off-site disposal facility or facilities, and an on-site transportation and disposal plan." While the document does capture the majority of elements required for this Plan, it refers to the accompanying Conceptual RD/RA Work Plan for key components. A critical element to the transportation and disposal procedures is the treatment of decanted water from sediment waste materials. The Conceptual RD/RA indicates that these liquids will be treated with an "appropriate treatment process." However, neither the Transportation Plan nor the Conceptual RD/RA Work Plan address what this treatment process will be. The water itself likely will be a hazardous waste, and any resulting filtrate of sediment collected from water treatment will also be a waste requiring management and appropriate disposal. Either the Final RD/RA Work Plan or the Transportation Plan needs to more fully describe how the decanted water and treatment-produced materials (such as filtrate, created treatment sludge, etc.) are to be addressed.

The community may want to ask EPA if the Transportation Plan or the forthcoming Final RD/RA Work Plan will describe the appropriate treatment process for acquired decant water (and water treatment filtrate).

12. Section I (pdf page 81) of the Revised Permit defines the ROR Schedule. As stated in this section, "Implementation of the Corrective Measures shall begin concurrently, if feasible. Permittee shall begin such concurrent implementation in Reach 5A (sediment and Floodplain) and Woods Pond, unless Permittee proposed, and EPA approves an alternate approach. ... Corrective Measures shall proceed downstream from Reach 5A and Woods Pond on a parallel track." The Transportation Plan does not describe how Reach 5A and Woods Pond corrective measures shall be accomplished concurrently. If these two areas are to be addressed concurrently, then there are traffic patterns that will need to be coordinated.

The community may want to ask EPA if the Plan should be amended to describe any coordinated transportation approaches that will occur to address concurrent remedial action activities at Reach 5A and Woods Pond.

13. The proposed transportation routes acknowledge and attempt to avoid areas with dense populations. The ROR remedial action activities are to take place over several decades during which the area's populations may change. It is not clear if this Plan takes

population growth and changes (such as expansion of residential areas, or congestion of traffic) into account.

The community may want to ask EPA if the Plan addresses possible concerns related to expanded residential areas and increased traffic associated with ongoing population growth during the length of time needed for the ROR remediation.

14. The anticipated travel routes for on-site disposal are shown on Figures 3-1 through 3-3 (by ROR Reach) and the routes for off-site disposal are shown on Figures 4-1 through 4-3. It appears that most of these routes avoid populated areas, however the communities should review these figures to identify any suggestions or concerns they may have.

The community may want to review the anticipated travel routes and provide feedback to EPA if there are any routes that are problematic to community members.

15. The town of Lee is a small community with only a few roads within the residential community. Figure 4-3 indicates that a “potential truck route for off-site disposal” may pass through the center of this community. It seems appropriate for GE to route traffic away from this area and rely on roads in areas that are less populated.

The community may want to ask EPA if GE can consider a different route for off-site waste disposal, in order to avoid sending trucks through the center of the town of Lee.

16. The removal action at the 1½-Mile Reach of the Housatonic River, which is located immediately upstream of the ROR (a cleanup was completed by EPA in 2006 and documented in a series of completion reports [EPA, 2024 and Weston Solutions Inc., 2011]) is often referred to within the Transportation Plan and provides a foundation for several decisions (such as the rate of sampling of materials to determine disposal method, etc.). It would be useful to understand if this previous project encountered any useful traffic observations applicable to the Transportation Plan such as traffic issues, activities prone to releasing spills, etc. It would be appropriate if any lessons learned from this previous work were to be incorporated in this Plan.

The community may want to ask EPA if the 1 1/2-Mile Reach cleanup project completed by EPA in 2006 could provide any useful traffic information that would pertain to the Transportation Plan.

17. Footnote b on page 7 of the Transportation Plan states that “other materials generated during implementation of the ROR Remedial action, such as materials used to build temporary access roads and staging areas, may be disposed of in the UDF.” This statement demonstrates the need to sample the base materials from access roads and staging areas to determine their fate as a potential ROR waste. It would be beneficial if surface materials from these areas could be sampled to determine possible Total PCB content from dust, which is a safety concern to surrounding communities.

The community may want to ask EPA if surface materials from access roads and staging areas could be sampled to monitor Total PCB content in possible dust emissions to determine if there is a concern to surrounding communities and also to determine the ultimate disposal location for these materials.

18. The Transportation Plan states that “the potential for spills during on-site transportation will be addressed in the Contingency and Emergency Procedures Plan to be included in the upcoming Project Operations Plan (POP) (to be submitted to EPA by January 25, 2024).” The treatment of spills is an important safety concern to the community, therefore it seems important that they are able to have enough time to review this document.

The community may want to ask EPA if the community will be allowed adequate time to review the forthcoming POP.

References Cited

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**JOINT LETTER OF THE SELECT BOARDS IN THE TOWNS OF
GREAT BARRINGTON, LEE, LENOX,
SHEFFIELD, STOCKBRIDGE AND WEST STOCKBRIDGE
REGARDING RAIL TRANSPORT FOR HOUSATONIC REST OF RIVER CLEANUP PLAN**

January 17, 2024

[VIA EMAIL: tagliaferro.dean@epa.gov]

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

RE: Rest of River – General Electric Transportation & Disposal (T&D) Plan

Dear Mr. Tagliaferro,

Allow us to articulate our towns' resolute support for the integration of rail transport in the Housatonic Rest of River clean-up project. However, our collective sentiment is one of profound surprise and disappointment stemming from the apparent disregard for rail options evident in the recent plan submitted by Arcadis on behalf of General Electric. The challenges posed to rail within this submission lack the inventive solutions we had hoped for, and the early emphasis on trucks raises legitimate concerns about the depth of GE's commitment to a comprehensive analysis of rail transport in the project's future stages.

We insist that ongoing evaluations be conducted with greater rigor than has been demonstrated so far, recognizing the Environmental Protection Agency (EPA) as the sole entity endowed with the authority to mandate such endeavors. The paramount importance of maximizing rail transport, both to the Upland Disposal Facility (UDF) and beyond state borders, cannot be overstated. It serves as a linchpin for minimizing disruption to our residents and alleviating the burden on municipal infrastructure. In our perspective, rail should be elevated to the status of the primary mode of transport—an inclination not presently mirrored in the existing plan.

Our conviction remains steadfast in the notion that maximizing rail represents the most judicious approach to the project, countering the prevailing emphasis on trucks. We fully expect EPA, guided by its policy goals, will discern rail as the optimal choice, given its inherent capacity to reduce vehicular traffic on roadways, rendering it a safer option. Furthermore, from a public health standpoint, rail will likely emerge as the safest option, pending confirmation by the respective boards of health, whose scientific analyses are anticipated.

The plan's apparent indifference towards rail introduces legitimate apprehensions regarding the boundaries prescribed by the settlement agreement that precipitated its formulation. Should insurmountable financial constraints contribute to the dismissal of rail, we beseech our federal delegation (copied) to procure the requisite supplemental aid for improvements, thereby bridging


any extant gaps. Put plainly, if GE lacks a legal mandate to fund rail infrastructure, we advocate for federal funding to be secured for necessary improvements preceding the project's commencement. This proposition encapsulates the most substantive contribution our federal representatives can proffer at this stage, surpassing the confines of existing regulatory or settlement agreement provisions.

As the ongoing comment period persists, you may anticipate further missives from each of our towns, ardently championing the cause of rail, supplemented by comprehensive analyses. We extend our gratitude for your thoughtful consideration and anticipate a favorable response.

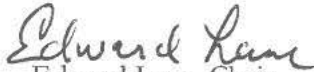
Sincerely,



Stephen Bannon, Chair
Selectboard, Great Barrington, MA



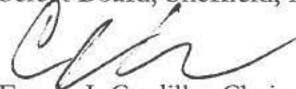
Robert H. Jones, Jr., Chair
Select Board, Lee, MA



Edward Lane, Chair
Select Board, Lenox, MA



Robert C. Kilmer, Jr., Chair
Select Board, Sheffield, MA



Ernest J. Cardillo, Chair
Board of Selectmen, Stockbridge, MA



Kathleen Keresey, Chair
Select Board, West Stockbridge, MA

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

From: [White, Patrick](#)
To: [R1Housatonic](#); [Tagliaferro, Dean](#); shannon.holsey@mohican-nsn.gov; [Sherry White](#); thpo@mohican-nsn.gov; [Bonney Hartley](#)
Cc: [Mark, Paul \(SEN\)](#); [Pignatelli, Smitty - Rep. \(HOU\)](#); [Stone, Oleander \(EEA\)](#)
Subject: Comments on Rest of River Transportation Plan
Date: Thursday, February 1, 2024 8:47:56 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:

I would like to raise an issue I hope is not being overlooked: the question of Native American remains at potential staging areas for the Rest of River project. The Mohicans lived by the Housatonic River's banks. There are at least 20 documented areas of significance in Pittsfield alone, and dozens more as you move south to Sheffield.

Site selection impacts all aspects of this project. is especially important as EPA considers its options and how your decisions will impact areas that are of prime importance to today's Mohicans, whose recognized government is the Stockbridge-Munsee Band of Mohicans. It would be wise that EPA considers its obligations under Federal law with respect to the decisions you will make as you implement the Rest of River clean-up.

Since 1990, Federal law has provided for the protection and return of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. By enacting NAGPRA, Congress recognized that human remains of any ancestry "must at all times be treated with dignity and respect." Congress also acknowledged that human remains and other cultural items removed from Federal or tribal lands belong, in the first instance, to lineal descendants, Indian Tribes, and Native Hawaiian organizations. With this law, Congress sought to encourage a continuing dialogue between landowners and Indian Tribes and Native Hawaiian organizations and to promote a greater understanding between the stakeholders. ([US Senate Report 101-473](#)).

The Mohican territory was a four-state area from Lake Champlain to the Housatonic and the Hudson to the modern-day Connecticut border. In Berkshire County, the Mohicans self-identified as "River People," which is why the Tribe called themselves Muh-hi-kun-nuk meaning "The

people of the waters that are never still”. Rivers were Mah-hi-kanni-tuk which means “the continually flowing water.”

In Stockbridge, where I serve as a Selectman, we are actively pursuing projects to foster reconciliation and renewal of the Town’s relationship with the Mohican people who will return here with their pending purchase of the north face of Monument Mountain. For example, non-profits and the Mohican Tribal government have explored ground in two areas of town using ground penetrating radar (GPR) and have pinpointed at least two specific burial locations that were not previously known in their specificity, at least not in modern times.

Frankly, EPA and GE should quickly ensure they are following established protocols, as well as state and federal law, for identifying burial and archaeological locations before any site selection is considered, let alone decided. These efforts should include:

- Review of historical documents that provide a remarkable level of detail regarding important burial and archaeological locations.
- Identification of locations that are likely to have been used for burials. Likely sites include bluffs above the river proper.
- Mapping of such locations that may involve ground disturbance using GPR technology.
- A plan for oversight of all actual ground disturbance with on-site representatives of the Stockbridge-Munsee Mohican Tribal Historical Preservation Officer.
- A plan to either choose different sites or mitigate the impact on these sites should they be found to contain archaeological artifacts or human remains.

EPA and GE and both a legal and moral obligation to conduct this review and honor the cultural traditions of our local indigenous people.

I strongly recommend the Tribal Council, Shannon Holsey President, be contacted without delay to begin a dialog on how to address these issues. To date, such a conversation to my knowledge has been entirely lacking.

Patrick White
Stockbridge Select Board

From: [Wilton, Curt](#)
To: [R1Housatonic](#)
Subject: Trucking Routes
Date: Monday, January 22, 2024 2:59:37 PM

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Good Afternoon,

My name is Curt Wilton and I am the Public Works Director for the Town of West Stockbridge, Massachusetts. I am writing this letter to express my Wholehearted Disapproval to G.E.'s truck route in regards to the Housatonic Rest of River Permit.

I do realize that this cleanup effort will require excavation of hundreds of thousands cubic yards of materials to be trucked to a dumping location but the damage to our local roads should not be considered collateral damage. Reach #7 and Reach #8 have the truck route utilizing Route 102 west. Although Route 102 is owned and maintained by the Massachusetts Highway Department it intersects into Downtown Main Street West Stockbridge, Mass. West Stockbridge is a very small community and our Main Street is owned and fully maintained by the Town. We as a Community do not have the financial resources to provide for premature wear from the astronomical added heavy truck traffic not to mention the bottle necked narrow lanes with a 15mph speed limit. G.E would be putting Public Safety at risk and would cause sever deterioration to our Town as a whole. I and the majority of residents are NOT in favor of this route.

Sincerely,

Curt Wilton

1/22/24

**TRI-TOWN HEALTH DEPARTMENT
TRI-TOWN BOARDS OF HEALTH
Lee - Lenox – Stockbridge**

January 29, 2024

[VIA EMAIL: tagliaferro.dean@epa.gov]

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

RE: Rest of River – General Electric Transportation & Disposal Plan Public Comments

Dear Mr. Tagliaferro,

The Tri-Town Boards of Health, representing the boards of health in Lee, Lenox, and Stockbridge, hereby submits this to the public comment record regarding the October 31, 2023, General Electric Proposed Transportation and Disposal Plan due to the plan submitted by GE that inadequately addresses any studies or information on the efficacy of use of rail for transportation of PCB material to the UDF and out of state. In addition, the inadequate Transportation and Disposal Plan submitted by GE delays the process and endangers the public and health and safety of our communities.

As you are aware the Town of Lee Board of Health held an adjudicatory hearing on November 19, 2022, to determine where the proposed UDF constitutes a public health and safety concern of the residents of the Town of Lee. At the conclusion of the adjudicatory hearing, on April 27, 2023, the Town of Lee concluded that “the Lee Board of Health hereby considers that the proposed UDF may pose an increased risk to the health of the residents in Lee”. As part of the UDF process we also have public health and safety concerns with respect to the Transportation and Disposal Plan submitted to the EPA on October 31, 2023.

The Board urges the EPA to consider our public health concerns and ask that G.E. rewrite their proposal as the current proposal is inadequate and incomplete and a missed opportunity to study the efficacy of rail. The October 31, 2023, plan relies heavily, if not exclusively, on transport of PCB laden materials by truck for both on-site and off-site disposal. Although transportation by rail was consistently mentioned favorably in previous iterations of plans for cleanup of the Rest of Housatonic River, the current plan does little beyond raising some objections to use of rail, primarily the need for physical improvements, access to privately owned land, possible increased truck trips, etc., but did not appear to pursue the issue beyond the preliminary studies completed three years ago by the Housatonic Railroad Company. These studies concluded that

45 Railroad Street-Lee, MA 01238
Tel: 413-243-5540- Fax: 413-243-5542

transport by rail was feasible, including creating rail access to the UDF. Further detailed study of the feasibility of rail is needed, hopefully accompanied by specific proposals.

The apparent *de facto* exclusion of rail transport in favor of trucks has emerged as a focus of our concerns. We need more information, and particularly comparable information between trucks and rail, regarding emissions, greenhouse gases, air quality, noise pollution, pedestrian and driver safety, recreational opportunities, and overall community health and safety.

Having attended the G.E. presentation at the Lee High School on November 28th it is evident that there was not much thought into presenting any information or data regarding studies that should have been done on the environmental impact for the town of Lenox.

Berkshire County is a major tourist destination, drawing thousands of people for concerts, stage productions, hiking, camping, boating, leaf peeping, skiing, and general relaxation. The effect of truck traffic on the tourist industry may be significant. Due to exponential increases in population during the tourist season, we have not seen any information on a traffic study that may impact truck transportation during peak seasons. Our concern also extends to the many residents that have voiced their anxiety and fear over the trucks driving past their front yards and children's school playgrounds. The mental health of our residents needs to be counted into the process.

Furthermore, delay in implementing the remediation of PCB contamination endangers the public health and safety of our communities. Stakeholders, including Senator Paul Mark and State Representative William Smitty Pignatelli and General Counsel for the Housatonic Railroad Company, Parker Rodriguez, in separate correspondence, have suggested that use of rail may allow implementation to begin earlier than if trucks are primarily utilized. The possibility exists that use of railroad will enable concurrent excavation thereby speeding the entire implementation process.

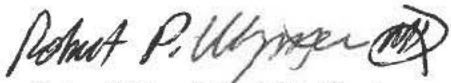
As stated, several times, a safe environment, and the wellbeing of our town residents during this entire remediation is our major concern and needs to be addressed before any further action is taken by G.E.

We also urge the EPA to extend the deadline for the public comment period (2/1/24) for several months to allow an in-depth study on the efficacy of rail to be completed.

Respectfully,

45 Railroad Street-Lee, MA 01238
Tel: 413-243-5540- Fax: 413-243-5542

For Lee Board of Health



Robert Wespiser, MD, Chair



Carisa Vincent, RN

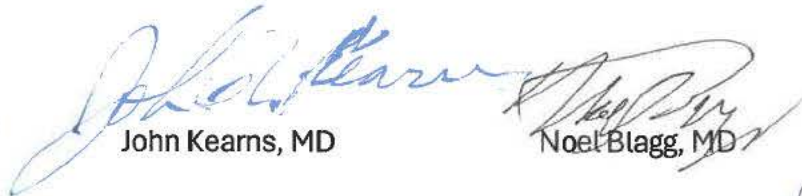


JoAnn Sullivan

Lenox Board of Health



Dianne Romeo, RN, Chair



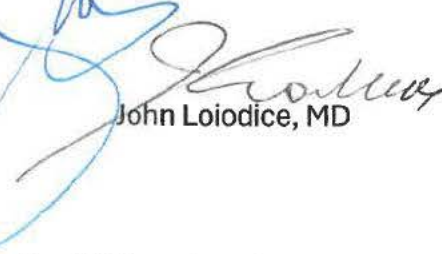
John Kearns, MD

Noel Blagg, MD

Stockbridge Board of Health



Charles Kenny, MD, Chair



John Loiodice, MD



Elias Lefferman PhD



James J. Wilusz, RS
Executive Director/Tri-Town Health Department

- 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
- Town Managers
Tri-Town Health Department
Tri-Town Board of Health Members

From: [Charles Kenny](#)
To: [Brooks, Ashlin](#)
Cc: [Robert Jones](#); [Parker Rodriguez](#)
Subject: 11-28-2023 Lee Select Board Meeting
Date: Wednesday, November 29, 2023 10:08:27 AM

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Aslin,

On behalf of the Tri-Town Board of Health I want to thank the Region for enabling last night's public discussion before the Lee Select Board. Also, I will submit the below as a public comment, but also wish to convey it directly as part of my appreciation of last night's presentation.

11-29-2023:

I submit the following comment regarding the transportation plan that was partially presented by GE last night.

I consider the Region's interest in expediting the remaining implementation of the remedy, the Region's stated intention to minimize the public's contact with PCB waste, and the Revised Final Permit 12-2020 Section II. B. 6., which directs the permittee to include measures to maximize the transport of such waste material to off-site facilities via rail.

I note that the ATTACHMENT D to said Revised Final Permit (TSCA 40 C.F.R. SECTION 761.61(C) DETERMINATION), states "At least 100,000 cubic yards of contaminated sediment and Floodplain soil that is removed will be disposed of off-site at an existing TSCA-approved disposal facility or RCRA hazardous waste landfill or a landfill permitted by the receiving state to accept PCB remediation wastes, depending on the contaminant levels and waste classifications."

I also note that no corresponding required minimum amount of waste is specified to be placed into the local UDF by either the 2020 Settlement Agreement, or the Revised Final Permit, or the Consent Decree, or any other document available in the EPA's online record collection.

Considering also the Region's stated intention to manage the implementation of the remedy adaptively, as well as the Housatonic Railroad Company's letter read last night indicating the rail transport of PCB waste can likely be accomplished with far less trucking and public contact than envisioned by GE, I recommend that the following course of action should be undertaken to perform the transportation:

Material excavated from the river, riverbank, and floodplain should be placed adjacent to appropriately located rail staging areas for dewatering, examination, and sorting, and put into sealed containers for direct placement onto railcars. The material should be carried by rail to appropriate off-site facilities, as originally preferred by the EPA. The preceding procedures should be applied to all reaches of Rest of the River, except for Reach 5C and Wood's Pond. Waste material from Reach 5C and Wood's Pond should be excavated hydraulically and placed directly into the UDF.

General Electric may determine that, with adequate rail staging in place for off-site transportation of all material, the construction and maintenance of a local UDF is no longer desirable, in which case the proposed local UDF site could serve as a dewatering and staging area for the off-site transportation by rail of the waste material removed from Reach 5C and Wood's Pond.

Charles Kenny MD
Chair, Tri-Town Board of Health

TRI-TOWN HEALTH DEPARTMENT
Lee - Lenox – Stockbridge

January 31, 2024

[VIA EMAIL: tagliaferro.dean@epa.gov]

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

RE: Rest of River – General Electric Transportation & Disposal Plan Public Comments

Dear Mr. Tagliaferro,

The Tri-Town Health Department (TTHD) believes that objective consideration of the combined use of hydraulic dredging, with conveyance directly to the on-site upland disposal facility (UDF) or to staging areas for maximized transport off-site by rail, together with maximized off-site transport of the remaining excavated PCB waste by rail will serve the best interests of the public health and safety of the towns of Lee, Lenox, and Stockbridge, Massachusetts.

TTHD implements the policies and directives of The Tri-Town Board of Health (TTBOH) and strives to advocate for the public welfare. TTBOH expects the Region to require the General Electric Company (GE) to implement measures that are in the best interest of the environment and welfare of our towns, and not to allow costs incurred by GE to be a factor in overturning the assessment of practicability of such measures. In other words, make GE do what is right and make GE pay for it.

The December 2020 Revised Final Permit directs GE to consider measures that maximize the amount of polychlorinated biphenyl (PCB) waste transported off-site by rail, to the extent practicable. The single measure that both makes practicable and simultaneously maximizes the amount of PCB waste transportable off-site by rail is the construction of rail staging areas that are adequate to receive and transport PCB waste on-site to the UDF. Once rail staging areas are in place, the only design, planning, and cost considerations that remain have to do with the differential transport of PCB waste to off-site Toxic Substance and Control Act (TSCA) and non-TSCA regulated facilities versus transport to the UDF.

The Environmental Appeals Board, in remanding the 2016 Permit to the Region for reconsideration of whether off-site or on-site disposal was appropriate, carefully instructed the Region that, “We take no position on the ultimate resolution of that issue.” (ENVIRONMENTAL ADMINISTRATIVE DECISIONS: IN RE GENERAL ELECTRIC COMPANY RCRA Appeal Nos. 16-01 to 16-05 January 26, 2018; Vol 17: pg. 437) ([https://yosemite.epa.gov/OA/EAB_WEB_Docket.nsf/All%20By%20Appeal%20Number/22DAD52174733A728525822100750537/\\$File/GE%20Vol%2017.pdf](https://yosemite.epa.gov/OA/EAB_WEB_Docket.nsf/All%20By%20Appeal%20Number/22DAD52174733A728525822100750537/$File/GE%20Vol%2017.pdf))

Given the 2020 Revised Final Permit directive to GE to propose measures that maximize the amount of PCB waste transported off-site by rail, once railroad staging has been installed to receive and transport

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Email: info@tritownhealth.org

waste, the only logical measure is to transport all such waste off-site by rail to TSCA and non-TSCA facilities. Consistent with the policy espoused by the TTBOH, it is the position of the TTHD that off-site transfer of such waste by rail should not be judged impracticable because of extra cost incurred by GE.

Both the December 2020 Revised Final Permit and the Final Permit Modification of 2016 specify that at least 100,000 cubic yards of PCB waste must be transported off-site. Both permits also require the Region to examine measures that maximize the amount of PCB waste to be transported off-site by rail. Neither permit specifies a minimum amount of waste that must go to the UDF.

TTHD believes that it is likely that an adequate examination will find that far more than 100,000 cubic yards can be transported practicably by rail off-site. In such case, the reasonable expectation of a minimum capacity estimate for the UDF should reflect the amount transported off-site by rail. TTHD believes a reasoned determination of the expected minimum capacity of the UDF according to the 2020 Final Permit Modification is important to allow the maximization of off-site transport by rail to proceed without compromise. The expected minimum capacity for the UDF should not be calculated by considerations that optimize the economic benefit accruing to GE.

The Housatonic Railroad Company (HRRC) has stated that railroad staging areas can be constructed in most reaches, contrary to what GE has proposed. TTBH urges the Region to require GE objectively to examine the feasibility of construction of railroad staging areas in all reaches. TTBH urges the Region to obtain independent third-party advice to select off-site facilities, both TSCA and non-TSCA, that optimize practicability of railroad transport.

Hydraulic dredging may be feasible at multiple reaches, in some cases for conveyance directly to the UDF. For those reaches where conveyance directly to the UDF is not feasible, consideration of waste conveyance to staging areas for maximized transport off-site by rail should be part of GE's proposal.

Jim Wilusz, R.S.
Executive Director

Charles Kenny, M.D.
Medical Director

Tri-Town Health Department
Lee, Massachusetts

Michael Lanoue, Chair
Peter Stanton, Vice Chair
Ruby Chang, M.D.



Town Hall, 334 Main Street
Great Barrington, MA 01230

Phone: 413-528-0680
Cell: 413-717-2010

TOWN OF GREAT BARRINGTON MASSACHUSETTS

Rebecca Jurczyk
rjurczyk@townofgb.org

BOARD OF HEALTH

January 23, 2024

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

RE: Rest of River- General Electric Transportation & Disposal Plan

Dear Mr. Tagliaferro:

The Great Barrington Board of Health hereby submits this into the public comment record regarding the October 31, 2023, General Electric On-Site and Off-Site Transportation and Disposal Plan (T&D Plan.)

It is the duty of the Board of Health to ensure the residents of Great Barrington are provided with the utmost considerations for their health and wellbeing during the remediation project. As you are aware, the Quality of Life Compliance Plan for the Rest of River Remedial Action, prepared for GE by Anchor QEA and Arcadis on December 20, 2023 as well as the T&D Plan have not addressed data concerning risk/benefit study for rail transportation. Concerns by the Board of Health include presence of particulate matter, contamination with PCB in our environment, effects on human health, stress induced by transportation systems and danger to road travel for residents and multitude of visitors to our area which is a major sustaining support for our local economy.

The BOH requests that the Reporting for Excellence concerning particulate matter, noise and light be reported with transparency as soon as possible to our town as well as the EPA. This will provide a more expedient system of warning for our residents. By the time EPA is notified, time has already passed to warn residents such as closing their windows and limiting their outdoor activities.

We do have concerns about how the expediences are addressed in a timely and effective manner that would provide confidence to our residents.

The BOH of Great Barrington has recommended a rail transportation feasibility study as soon as possible and a delay of the comment period for at least 6 months after this study is published. As you well know, the BOH also has jurisdiction over environmental matters. We do not see any wording with compliance to the EPA Greener Cleanup Best Management Practices for PCB Cleanups. There was no mention of studies for best management practices for wildlife. There are no traffic studies that have taken into consideration the prevention of traffic accidents, pedestrian safety issues or bicycle traffic management.

While the rail feasibility studies are being done, we would assume that a study on creosote effects on our environment and use of herbicides over these tracks as well as noise, air quality and light pollution would be included in such reports.

We also seek documentation concerning methods of monitoring and remediation of the following that has yet to be addressed in the boiler plate report dated December 20,2023. This includes the following Best Management Practices outlined in EPA Greener Cleanup Guidelines:

- 1.) Use of decontamination procedures with biodegradable products, truck and rail idle reduction plan, use of ultra-low, low sulfur diesel or alternative fuels.
- 2.) Restriction of traffic to well defined corridors to minimize soil and land disturbances, restoration and maintenance of native ecosystems, re-establishment of native plants and avoidance of activity during migratory bird nesting season.
- 3.) Surface water monitoring during dredging and transportation while performing the dewatering process such as storm water drains and water downstream from dredging site.
- 4.) Use of drilling methods that is by direct push technology which would decrease time and drilling fluid use.
- 5.) Clear concise guidelines on treatment of PCB remediation waste, such as aqueous components from sediment leachate and removal of water from bulk PCB laden soil.
- 6.) Strict Emergency Cleanup guidelines with clear chains of command and timelines. This is to protect imminent danger to health and environment.

Due diligence to all factors involving population health and welfare should be of utmost importance to our communities. The carefully performed studies using not just industrial standards but also public health standards would support transparency for the community and provide more support for the cleanup of our beloved Housatonic River.

Respectfully submitted,



Dr. Ruby Chang



Michael Lanoue, Chair



Peter Stanton, Vice Chair

Great Barrington Board of Health

**TOWN OF LEE
LEE BOARD OF HEALTH**

January 31, 2024

[VIA EMAIL: tagliaferro.dean@epa.gov]

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

RE: Rest of River – General Electric Transportation & Disposal Plan Public Comments

Dear Mr. Tagliaferro,

As you are aware the Town of Lee Board of Health held an adjudicatory hearing on November 19, 2022, to determine whether the proposed UDF constitutes a public health and safety concern to the residents of the Town of Lee. At the conclusion of the adjudicatory hearing, on April 27, 2023, the Town of Lee concluded that “the Lee Board of Health hereby considers that the proposed UDF may pose an increased risk to the health of the residents in Lee”. Although the evidence provided by the parties at the adjudicatory hearing failed to reach a threshold of proof, we remain convinced that Lee is uniquely affected in a negative way by the UDF. As part of the UDF process we also have public health and safety concerns with respect to the Transportation and Disposal Plan submitted to the EPA on October 31, 2023.

The Lee Board of Health hereby submits this into the public comment record regarding the October 31, 2023, General Electric Proposed Transportation and Disposal Plan.

The Board urges the EPA to consider our public health concerns and ask that G.E. rewrite their proposal as the current proposal is inadequate and incomplete. We believe there is a mandatory requirement to study the efficacy of rail more thoroughly. The October 31, 2023, plan relies primarily on transport of PCB laden materials by truck for both on-site and off-site disposal. Although transportation by rail was consistently mentioned favorably in previous iterations of plans for cleanup of the Rest of Housatonic River, the current plan does little beyond raising some objections to use of rail but did not appear to pursue the issue beyond the preliminary studies completed three years ago by the Housatonic Railroad Company. These studies concluded that transport by rail was feasible. Further detailed study of the feasibility of rail is needed, hopefully accompanied by specific proposals.

The exclusion of rail transport in favor of trucks has emerged as a focus of our concerns. We need more information, and particularly comparable information between trucks and rail, regarding emissions, air quality, noise pollution, pedestrian and driver safety and overall community health and safety.


Berkshire County is a major tourist destination, drawing thousands of people for concerts, stage productions, hiking, camping, boating, leaf peeping, skiing, and general relaxation. Much of that traffic passes through Lee, on Main Street. The effect of truck traffic on the tourist industry may be significant. Due to exponential increases in population during the tourist season, we have not seen any information on a traffic study that may impact the health and vitality of Lee during peak seasons. Our concern also extends to the many residents that have voiced their anxiety and fear over the trucks driving past their front yards and children's school playgrounds. The mental health of our residents needs to be counted into the process.

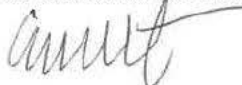
As stated, several times, a safe environment, and the wellbeing of our town residents during this entire remediation is our major concern and needs to be addressed before any further action is taken by G.E.

GE is responsible for the massive environmental contamination; the cleanup is their responsibility. This responsibility includes taking extraordinary efforts in implementing the PCB cleanup to minimize our citizens' burden, both those easily measured and clear-cut, as well as those deleterious effects that are harder to quantify but no less important.

In addition, we urge the EPA to extend the deadline for the public comment period (2/1/24) for several months to allow an in-depth study on the efficacy of rail to be completed.

Respectfully,


Robert Wespiser, MD, Chair
Lee Board of Health


Carisa Vincent, RN
Lee Board of Health


JoAnn Sullivan
Lee Board of Health


James J. Wilusz, RS
Executive Director/Tri-Town Health Department

cc: The Honorable Edward Markey, U.S. Senate
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The Honorable Richard Neal, U.S. House of Representatives
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The Honorable Paul Mark, State Senator
The Honorable Smitty Pignatelli, State Representative, 3rd Berkshire
Town Managers
Tri-Town Health Department
Tri-Town Board of Health Members

**TOWN OF LENOX
LENOX BOARD OF HEALTH**

January 11, 2024

[VIA EMAIL: tagliaferro.dean@epa.gov]

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

RE: Rest of River – General Electric Transportation & Disposal Plan Public Comments

Dear Mr. Tagliaferro,

The Lenox Board of Health hereby submits this into the public comment record regarding the October 31, 2023, General Electric Proposed Transportation and Disposal Plan.

The Board urges the EPA to consider our public health concerns and ask that G.E. rewrite their proposal as the current proposal is inadequate and incomplete and a missed opportunity to study the efficacy of rail. The October 31, 2023, plan relies heavily, if not exclusively, on transport of PCB laden materials by truck for both on-site and off-site disposal. Although transportation by rail was consistently mentioned favorably in previous iterations of plans for cleanup of the Rest of Housatonic River, the current plan does little beyond raising some objections to use of rail, primarily the need for physical improvements, access to privately owned land, possible increased truck trips, etc., but did not appear to pursue the issue beyond the preliminary studies completed three years ago by the Housatonic Railroad Company. These studies concluded that transport by rail was feasible, including creating rail access to the UDF. Further detailed study of the feasibility of rail is needed, hopefully accompanied by specific proposals.

The apparent *de facto* exclusion of rail transport in favor of trucks has emerged as a focus of our concerns. We need more information, and particularly comparable information between trucks and rail, regarding emissions, greenhouse gases, air quality, noise pollution, pedestrian and driver safety, recreational opportunities, and overall community health and safety. We note that these are among the issues to be undertaken by the Quality-of-Life Compliance Plan to be submitted to EPA in December 2023. We feel these issues need to be addressed as integral to the Transportation Plan as well.

If gaps in funding are identified with the efficacy of a rail study, we implore our state and federal delegation to identify the federal resources needed to study and implement the use of rail if such a study finds the use of rail feasible. GE's lack of willingness to utilize additional funding is not the sole reason to determine if rail is not feasible.

Having attended the G.E. presentation at the Lee High School on November 28th it is evident that there was not much thought into presenting any information or data regarding studies that should have been done on the environmental impact for the town of Lenox.

Berkshire County is a major tourist destination, drawing thousands of people for concerts, stage productions, hiking, camping, boating, leaf peeping, skiing, and general relaxation. The effect of truck traffic on the tourist industry may be significant. Due to exponential increases in population during the tourist season, we have not seen any information on a traffic study that may impact truck transportation during peak seasons. Our concern also extends to the many residents that have voiced their anxiety and fear over the trucks driving past their front yards and children's school playgrounds. The mental health of our residents needs to be counted into the process.

As stated, several times, a safe environment, and the wellbeing of our town residents during this entire remediation is our major concern and needs to be addressed before any further action is taken by G.E.

We also urge the EPA to extend the deadline for the public comment period (2/1/24) for several months to allow an in-depth study on the efficacy of rail to be completed.

Respectfully,


Dianne Romeo, RN, Chair
Lenox Board of Health


Noel Blagg, MD
Lenox Board of Health


John Kearns, MD
Lenox Board of Health


James J. Wilusz, RS
Executive Director/Tri-Town Health Department

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
Town Managers
Tri-Town Health Department
Tri-Town Board of Health Members

TOWN OF STOCKBRIDGE *
STOCKBRIDGE BOARD OF HEALTH

January 19, 2024

[VIA EMAIL: tagliaferro.dean@epa.gov]

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

RE: Rest of River – General Electric Transportation & Disposal Plan Public Comments

Dear Mr. Tagliaferro,

The Stockbridge Board of Health Board of Health hereby submits this into the public comment record regarding the October 31, 2023, General Electric Proposed Transportation and Disposal Plan.

The Board urges the EPA to consider our public health concerns and ask that G.E. rewrite their proposal as the current proposal is inadequate and incomplete and a missed opportunity to study the efficacy of rail. The October 31, 2023, plan relies heavily, if not exclusively, on transport of PCB laden materials by truck for both on-site and off-site disposal. Although transportation by rail was consistently mentioned favorably in previous iterations of plans for cleanup of the Rest of Housatonic River, the current plan does little beyond raising some objections to use of rail, primarily the need for physical improvements, access to privately owned land, possible increased truck trips, etc., but did not appear to pursue the issue beyond the preliminary studies completed three years ago by the Housatonic Railroad Company. These studies concluded that transport by rail was feasible, including creating rail access to the UDF. Further detailed study of the feasibility of rail is needed, hopefully accompanied by specific proposals.

The apparent *de facto* exclusion of rail transport in favor of trucks has emerged as a focus of our concerns. We need more information, and particularly comparable information between trucks and rail, regarding emissions, greenhouse gases, air quality, noise pollution, pedestrian and driver safety, recreational opportunities, and overall community health and safety. We note that these are among the issues to be undertaken by the Quality-of-Life Compliance Plan to be submitted to EPA in December 2023. We feel these issues need to be addressed as integral to the Transportation Plan as well.

If gaps in funding are identified with the efficacy of a rail study, we implore our state and federal delegation to identify the federal resources needed to study and implement the use of rail if

such a study finds the use of rail feasible. GE's lack of willingness to utilize additional funding is not the sole reason to determine if rail is not feasible.

Having attended the G.E. presentation at the Lee High School on November 28th it is evident that there was not much thought into presenting any information or data regarding studies that should have been done on the environmental impact for our towns.

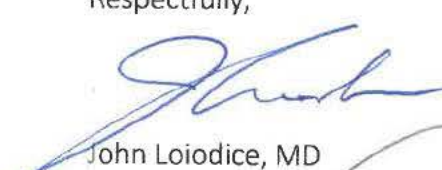
Berkshire County is a major tourist destination, drawing thousands of people for concerts, stage productions, hiking, camping, boating, leaf peaking, skiing, and general relaxation. The effect of truck traffic on the tourist industry may be significant. Due to exponential increases in population during the tourist season, we have not seen any information on a traffic study that may impact truck transportation during peak seasons. Our concern also extends to the many residents that have voiced their anxiety and fear over the trucks driving past their front yards and children's school playgrounds. The mental health of our residents needs to be counted into the process.

As stated, several times, a safe environment, and the wellbeing of our town residents during this entire remediation is our major concern and needs to be addressed before any further action is taken by G.E.


Furthermore, it is clear that delay in implenting the remediation of PCB contamination in the Housatonic River endangers the public health and safety of our community. We urge the EPA to abandon GE's choice to use trucks because it is obvious that use of railroad will not only enable the implementation to begin earlier than trucks, before the local disposal facility has been completed, but use of railroad will also enable concurrent excavations, thereby speeding the entire implementation process, without the burdens of increased simultaneous truck transport.

We also urge the EPA to extend the deadline for the public comment period (2/1/24) for several months to allow an in-depth study on the efficacy of rail to be completed by an entity other than GE, such as the University of Massachusetts, and an adequate subsequent period of public review and comment.

Respectfully,



John Loiodice, MD
Stockbridge Board of Health



Elias Leiferman, PhD



Charles Kenny, MD, Chair



James J. Wilusz, RS
Executive Director/Tri-Town Health Department

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
Town Managers
Tri-Town Health Department
Tri-Town Board of Health Members



Berkshire Natural Resources Council

January 25, 2024

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

RE: Input requested on GE's Transportation and Disposal Plan, dated 10/31/2023

Dear Mr. Tagliaferro,

Berkshire Natural Resources Council (BNRC) is a regional conservation land trust operating throughout Berkshire County. We have conserved 25,990 acres across 223 sites and assisted in the protection of tens of thousands of acres in support of municipalities, conservation partners, and the Commonwealth. Our work focuses on land conservation, stewardship, public access, and community engagement. BNRC stewards 871 acres on seven sites with direct frontage on the Housatonic River below Reach 5, and an additional 910 acres on five sites within the affected riparian buffer or north of Reach 5.

The draft Transportation Plan proposed by General Electric, dated 10/31/2023, is significantly lacking in multiple areas of consideration. We appreciate the EPA's intention to require additional analysis and incorporation of alternative transportation for the Rest of River cleanup. The revised Transportation Plan should include a complete analysis of increased use of railroad and hydraulic transportation with the necessary assistive upgrades to infrastructure; careful consideration of the safety relative to the proposed truck routes and quality of life impacts on neighborhoods; and assessment of environmental impacts for any proposed transportation route. The revision should be provided with ample time for review and comment and not considered the final plan, given the significant deficiencies in this first draft.

This Transportation Plan should be developed hand-in-hand with the Quality-of-Life Plan with full consideration of all options incorporated. We appreciate the EPA's intention to hold General Electric to a higher standard for this crucial stage of planning.

Sincerely yours,

Mackenzie Greer
Director of Community Programs

Doug Brown
Director of Stewardship

Board of Directors

Jenny Hansell, President
Tim Crane, Chair
Pat Callahan, Vice Chair
Kim Seward, Secretary
Jeffrey Belair, Treasurer

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Henry Flint
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Ellen Hand
Caroline Holland
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bnrc.org

Citizens for PCB Removal Comments for *On-Site and Off-Site Transportation and Disposal Plan*

GE-Pittsfield/Housatonic River Site Rest of River (GECD850)

Citizens for PCB Removal (CPR) believes, as many do, that GE did not adequately evaluate the use of rail versus truck transportation in its submittal and proposal. Rail transportation should be further investigated and hopefully will result in fewer staging areas and cause more contamination to be removed to off-site locations.

CPR wishes to include the Commentary published in the Jan 14, 2024 Berkshire Eagle by Dr. Charles Kenny titled *Charles Kenny: Rest of River communities need a full accounting of what rail PCB disposal could offer*. Dr. Charles Kenny is the chairman of the Stockbridge Board of Health as well as the Tri-Town Board of Health, which represents Lee, Lenox and Stockbridge. CPR cannot make a more succinct argument against this GE submittal.

The Commentary can be found at https://www.berkshireeagle.com/opinion/columnists/charles-kenny-rest-of-river-communities-need-a-full-accounting-of-what-rail-pcb-disposal/article_434e26a0-aff3-11ee-b439-cb06e8d5f654.html and follows:

The people of Berkshire County deserve a full public presentation and discussion of an independent cost-benefit analysis comparing the use of railroad vs. trucks to transport polychlorinated biphenyl waste to the proposed upland disposal facility in Lee and to out-of-county disposal facilities. Such an unbiased analysis and public review is crucial to balance the misrepresentations, omissions and concealed cost-containment agenda items buried in the transportation plan recently presented by General Electric to the Lee Select Board and submitted to the Tri-Town Board of Health.

The Environmental Protection Agency has asserted that PCB removal should begin as soon as possible. GE's implementation would unfold over 13 years. According to the EPA, "transportation of PCB material won't start until late 2025 or early 2026 at the earliest, following construction of the disposal facility at the landfill, which could begin in September or late fall of 2024." Excavation south of Woods Pond would not begin until several years after that.

To detect and prevent excessive downstream transport of PCBs during remediation, EPA has established performance standards that require monitoring of flow and PCB concentrations downstream. Engineered caps will not be installed until all excavations have been completed. With these prescribed protections in place, the revised final permit issued in December 2020 states on Page 76: "Implementation of the Corrective Measures shall begin concurrently, if feasible. Permittee shall begin such concurrent implementation in Reach 5A (sediment and Floodplain) and Woods Pond, unless Permittee proposes, and EPA approves an alternate approach." The rate of truck traffic through Lee, Lenox and Stockbridge will increase proportionately as implementations are done concurrently instead of one after the other.

According to Housatonic Railroad Company officials, with the use of existing rail staging located near Greylock, Columbia, Eagle, Willow, and Rising Pond impoundments and newly constructed staging in other areas, HRRC could be ready within a year to receive all waste concurrently and transport it to approved off-site facilities, as originally planned by the EPA and recommended by the commonwealth, before the UDF would be ready. Once UDF construction is completed, remaining waste could go to the UDF using the same rail staging. This strategy in no way violates the 2020

revised final permit, the settlement agreement or the 2016 final permit. To the contrary, these permits stipulate that GE should attempt to maximize the off-site transport of PCB waste by rail (pp. 57-58 of the revised final permit).

Neither permit nor the settlement agreement requires that all material must go to the UDF. In fact, while a minimum of 10 percent of the waste must go off-site, no corresponding minimum is required to go to the UDF. Moreover, the Environmental Appeals Board, in remanding the 2016 permit back to EPA for reconsideration of whether off-site or on-site disposal was appropriate, carefully instructed EPA that, "We take no position on the ultimate resolution of that issue."

GE's plan makes the unwarranted assumption that only existing rail staging can be used. The advantages of new rail staging at needed excavation areas are not considered. According to HRRC officials, new rail staging can be installed in the excavation areas planned to be staged for trucks, using approximately the same footprint as truck staging areas, in a time frame that would allow transport to begin from these areas before the UDF is ready to accept waste. New rail staging would almost eliminate the need for trucks and for temporary trucking access roadways through the floodplain.

Woods Pond is currently scheduled for hydraulic dredging directly to the UDF. If this is not considered feasible, GE estimates an additional 55,000 truckloads will be required. Railroad currently is in place on the western side of the pond and should be more thoroughly considered.

GE's plan delays transportation several years to wait for completion of a local UDF and fails to propose use of rail for concurrent implementation as recommended in the revised final permit because GE has implicitly structured its plan to favor its preference for trucks and a local UDF at the expense of time efficiency and environmental and public health impacts of thousands upon thousands of diesel trucks on our communities. An objective assessment of rail and truck transport followed by an adequate subsequent public discussion period is urgently needed. It will likely reveal many time-saving and environmental advantages of rail over trucks not considered by GE.

Once adequate rail staging is in place to accommodate local and off-site transportation of waste, GE may determine that construction and long-term maintenance of a local UDF is no longer in its interest, and opt to transport all excavated waste by rail off-site, as originally preferred by the EPA, the commonwealth and by just about everyone who values the future of Berkshire County.

The foregoing is my personal opinion. Consensus comments will be submitted to EPA by each of the Boards of Health of Lee, Lenox and Stockbridge and by the Tri-Town Board of Health.

CPR also supports comments provided to EPA for all GE submittals that are sent in by HRI, HEAL and the newly formed Clean Berkshire Collective (CBC) group.

Respectfully,

Charles Cianfarini

Interim Executive Director

Citizens for PCB Removal

From: [Clean Berkshire Collective](#)
To: [Tagliaferro, Dean](#); [Cash, David](#); [R1Housatonic](#)
Cc: [REDACTED]; [Jared Weber](#); [Julia Thomas](#)
Subject: Clean Berkshire Collective Group Letter - GE/Arcadis T&D Plan Public Comment
Date: Thursday, February 1, 2024 1:23:27 PM
Attachments: [GE T&D Sign-on Letter to EPA - Clean Berkshire Collective 2024.02.01.pdf](#)
[CBC T&D Sign-on Letter Responses 2024.02.01.xlsx](#)

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, Mr. Cash, and the EPA Region 1 team:

Please find attached a group letter, drafted by the Clean Berkshire Collective and co-signed by 88 individuals over the past two weeks, as a form of collective public input on the GE/Arcadis Proposed On-Site and Off-Site Transportation and Disposal Plan.

As you will read, we stand by recent calls by municipalities, our elected state and local officials, public health experts, activist groups, and fellow citizens, for the completion of a rigorous cost-benefit analysis on the use of rail. With this letter, we also wish to highlight the **mental health and environmental justice**-related imperatives that help to make plain some of the most significant risks of a truck-based plan, many of which could be avoided by use of the Housatonic Railroad and improvements to its infrastructure.

Thank you for considering the perspectives and arguments represented in this letter, which we will also be circulating electronically (without the attached spreadsheet with contact information for co-signers) to those listed in the "cc" lines on page one.

We would be grateful for the opportunity to speak further with you about the application of an EJ lens to all aspects of the cleanup moving forward, and seek to do so in a collaborative and positive spirit.

We look forward to hearing from you.

Sincerely,
Julia Thomas, Clean Berkshire Collective
Debra Kelly, Lenox Against the Dump
Jared Weber, Clean Berkshire Collective/Lenox Against the Dump
Phoenix Haynes, Clean Berkshire Collective/Lenox Against the Dump

www.cleanberkshirecollective.group



February 1, 2024

**To: EPA GE-Pittsfield/Housatonic River Superfund Site Project Coordinator Dean Tagliaferro
EPA Region 1 Administrator David Cash**

Cc: The Honorable Joseph Biden, President of the United States
EPA Administrator Michael S. Regan
Theresa Segovia, EPA Office of Environmental Justice and External Civil Rights
Karim David Marshall, EPA Senior Advisor for Environmental Justice and External Civil Rights
The Honorable Edward Markey, US Senate
The Honorable Elizabeth Warren, US Senate
The Honorable Richard Neal, US House of Representatives
The Honorable Maura Healey, Governor of Massachusetts
The Honorable Paul Mark, State Senator
The Honorable Smitty Pignatelli, State Representative

**Letter to EPA Region 1 Representatives on GE's On-Site & Off-Site Transportation & Disposal Plan:
A Mental Health & Environmental Justice Imperative**

We are a group of nearly 100 citizens, professionals, and allies of Berkshire County, Massachusetts, who are alarmed by the details of General Electric Company's Proposed On-Site and Off-Site Transportation & Disposal Plan (T&D Plan), and concerned by the undue influence this corporation has had in recent years over the EPA GE-Pittsfield/Housatonic River Superfund remedy process – at the expense of meaningful community involvement.

Today, **we are writing to express our collective opposition to the GE/Arcadis T&D Plan and its reliance on trucks.** We stand behind the calls by municipalities, our elected state and local officials, public health experts, activist groups, and fellow citizens, for the completion of a rigorous cost-benefit analysis on the use of rail. With this letter, we also wish to highlight the **mental health and environmental justice**-related imperatives that help to make plain some of the most significant risks of a truck-based plan, many of which could be avoided by use of the Housatonic Railroad and improvements to its infrastructure.

Berkshire County is the [second least healthy county](#) in Massachusetts, has the state's highest premature death rate, extremely elevated rates of overdoses and injury deaths (including suicide), as well as increased cancer and other chronic disease incidence rates. The number of poor mental health days, single parent households, unemployed adults, and self-reported levels of excessive drinking are all well above state and national averages. These poor health outcomes persist despite the incredibly hard and dedicated work of medical and mental health professionals throughout the county. Residents face an affordable housing crisis, an aging and declining population, a lack of viable public transportation options, a shortage of providers, a very high cost of living, and significant income disparities which have only been magnified since the COVID-19 pandemic. The region will also face a continued increase in severe weather patterns - particularly heavy rains and flooding - over the next 100 years.

These are just some of the many key indicators which support the notion that large pockets of the local population are much more disadvantaged and vulnerable than has been accounted for, and experience much worse health outcomes today than at the time of EPA's original human risk assessments, which date back to nearly 20 years ago — long before the Revised Final Permit was issued in December 2020, which includes the mandate of a local dump for lower-level contaminants in a geologically suspect location, above an aquifer, on October Mountain at the border of Lenox in Lee.

Since the original health risk assessments were completed, we also have learned much about relevant “cumulative risk” factors, including but not limited to the role of social determinants of health; the harmful effects of microplastics and other persistent environmental contaminants to which we are all exposed on a daily basis; the interactions of psychosocial and physical stress; and the threat of climate change and extreme weather patterns on our region. Against this backdrop, some of the hidden risks posed by a trucking-based transportation plan become clear:

1. Unknown baseline exposure risk in affected municipalities

Tri-Town Board of Health Chair Dr. Charles Kenney noted at a recent meeting that any risk analysis on exposure to volatilized PCBs on proposed transportation routes in Pittsfield, Lee, Lenox, Stockbridge, Great Barrington, and West Stockbridge, is based on the assumption that the baseline PCB exposure is zero. But there hasn’t been sampling to back up that notion. Furthermore, rumors abound about the existence of PCB burial sites throughout the county.

We know that children are especially vulnerable to the harmful effects of PCBs. According to our count, GE’s proposed trucking routes pass a total of nine schools and early childhood centers, a bus depot for the Lenox Public Schools on Crystal Street, which is directly adjacent to the location of the planned “Upland Disposal Facility,” and at least four senior/assisted living centers. Countless residences, local businesses, restaurants, and cultural destinations are also on the route. It is also important to note that, as a consequence of school choice, an assessment of the risk of exposure to children, or the mental health stress of their parents, cannot be based merely on the demographic data of individual town residents. Likewise, residents of assisted living facilities have their own “exposome” and life history, and it can’t be assumed that their exposure risk is all the same.

1. The mental health burden of trucks

Community feedback on the T&D Plan demonstrates an almost universal feeling of anxiety and stress over potential exposure to contamination (as well as noise pollution, pedestrian safety concerns, and greenhouse emissions) from the proposed use of trucks. This is important, because studies show that psychosocial stress as a result of *perceived or feared* chronic exposure to environmental contamination (CEC) is a critical and often overlooked dimension of the public health burden these situations pose, and one that can be exacerbated by “institutional delegitimization” of community concerns. In a rigorous 2019 [systematic literature review and meta-analysis](#) assessing the psychological health impact of CEC from 24 years of social scientific studies, researchers’ findings “suggest that CEC has a robust impact on anxiety, general stress, [and] depression symptoms,” and that particularly relevant features include the “chronic ambiguity, invisibility, and subsequent hypervigilance associated with exposure and potential health effects.” Worse yet, there is evidence that “exposures to stress and environmental contaminants can interact, leading to worse health risks than either exposure on its own.”

This aligns with findings from the National Academy of Sciences, Engineering, and Medicine, which in February 2021 convened a multidisciplinary workshop, [The Interplay Between Environmental Exposures and Mental Health Outcomes](#). A major conclusion from this high level collaboration was that understanding and prioritizing the relationship between mental health and the environment is essential and “can increase awareness of the scope, interconnection, and impact of these processes; catalyze cutting-edge science to understand mechanisms, outcomes, and interventions; and inform decision making at scientific, policy, and individual levels.”

2. Institutional delegitimization and lack of transparency

Institutional delegitimization and the erosion of trust are among some of the more salient factors that can lead to even worse mental health outcomes. Some examples of these mediating factors include: inconsistent risk messaging; dismissive response to community concerns; perceived lack of transparency; and lack of serious opportunity for citizen input. From the closed-door nature of the 2020 Settlement Agreement negotiations, to EPA backtracking on the suitability of the site of the UDF, to the opacity around public health data and monitoring, and dismissal of concerns around ongoing health issues, the GE-Housatonic cleanup has been rife with institutional shortcomings in relation to community collaboration. This has only fueled a sense of mistrust, uncertainty, ambiguity, and hopelessness.

Since the release of the T&D Plan on October 31, 2023, community members have repeatedly and vocally expressed universal opposition to the details it contains, most specifically its reliance on trucks and the lack of thoughtful consideration around the feasibility of rail. If EPA fails to act on these clear directives and fails to require GE/Arcadis to conduct a rigorous cost-benefit analysis on the use of rail vs. trucks and rewrite their plan accordingly, this sense of powerlessness and isolation will undoubtedly be exacerbated, and mental health impacts will undoubtedly be significant.

The EPA GE-Pittsfield/Housatonic River Superfund Site is an Environmental Justice Crisis

In January 2021, President Biden's [Executive Order 14008 – Tackling the Climate Crisis at Home and Abroad](#) reaffirmed and strengthened the federal government's commitment to EJ, stating all agencies "must make achieving EJ part of their missions by developing programs, policies, and activities to address the disproportionately high and adverse human health, environmental, climate-related, and other cumulative impacts on disadvantaged communities." In a show of support for and commitment to upholding this important goal, EPA Administrator Regan soon after issued an Agency-wide directive "to take steps to better serve historically marginalized communities using cumulative impact assessment." EPA also [rightly states](#) that "solving longstanding environmental health problems, including health disparities exacerbated by racial and social injustices, requires an accurate and realistic assessment of the effects from **combined exposures to chemical and non-chemical stressors (cumulative impacts)** that inform decision-making at all levels."

To date, **no cumulative impact assessment has been done** for any portion of the EPA GE-Pittsfield/Housatonic River Superfund Site remediation.

In the absence of a comprehensive cumulative impact assessment, **it isn't possible for anyone to make truly informed claims** about the risk of human exposure to volatilized PCBs, diesel emissions, or noise pollution, from the transportation of contaminated sediment via 40,000+ trucks over highly trafficked Berkshire County roads during a thirteen year period. In contrast, with the benefit of an EJ-informed cumulative impact assessment, we believe the unacceptable costs associated with a trucking-based transportation plan will become as evident to the experts as it already is to residents—and that a reassessment of current plans for on-site disposal at an "Upland Disposal Facility" in Lee, at a site previously deemed unsuitable by the EPA, as well as reassessments of the cleanup in Pittsfield and of potential cancer clusters at Allendale Elementary School and elsewhere, will be natural next steps.

To this end, we wish to conclude this letter by respectfully requesting that the Environmental Protection Agency, and the state of Massachusetts, **take immediate steps to apply an EJ framework** to all aspects of the GE-Housatonic remedy moving forward. This call to action relates directly to our co-signed feedback on the need for an EJ-informed EPA assessment of the T&D Plan, and includes:

1. Updating all relevant public health datasets, including the [EPA EJScreen](#) tool, to reflect the fact that the *entirety* of the GE-Pittsfield/Housatonic River Site, which includes Pittsfield and the five Rest of River towns, is in fact a **Superfund** site (currently only Pittsfield is marked as a municipality with a Superfund-designated site on EJScreen maps). The Rest of River sites may have been excluded from the map because they are not listed on the National Priorities List (NPL). But this is because GE bargained with EPA out of getting that designation, not because the area poses any less of a threat to human health. Therefore it must be reflected on screening tools and in all future decision-making processes as a Superfund site, and a significant variable in assessing our county's health.
2. Disaggregating and incorporating more useful demographic data, in light of the wealth disparities between second homeowner and full-time resident populations. Town-wide averages of household income, for instance, may belie the economic realities for those who are most impacted by the remediation.

3. Designating *all* affected municipalities as [EJ40 Disadvantaged Communities](#) accordingly; and
4. **Conducting a cumulative impact assessment** to gain critical information about the totality of environmental and non-environmental stressors to which the most vulnerable impacted populations are already exposed, and their effects on health, well-being, and quality of life outcomes.

The importance of EJ and enhanced community input cannot be understated - particularly within the context of our rural, underserved region's marginalized history and the role GE has played in its economic and health challenges since it began polluting the Housatonic and surrounding floodplain with millions of pounds of Monsanto's toxic PCBs nearly a century ago. The latest [revelations from the town of Lee](#), that GE signed a contract with Monsanto in 1972 releasing the notorious chemical corporation from liability and continuing to purchase, expose workers to, and dispose of, PCBs despite knowing the full scope of the harms they cause, comes as no surprise. What is more clear now than ever is that GE cannot be trusted to carry out a safe cleanup, and that the fears and concerns that have been dismissed for generations must be taken seriously. EPA's response to the town of Lee's claims, that this information doesn't affect the finality of the remedy, fails to account for the fact that EJ principles clearly require all aspects of an environmental remediation to be informed by a recognition of **historical social injustices** that allowed contamination to happen.

We understand that the 2000 Consent Decree committed parties to a partial cost-sharing model, and that budgetary concerns may be playing an outsized role in how the EPA and the state respond to clear directives from the community to hold GE accountable and complete an effective, safe cleanup. But **a rightful designation of all affected municipalities as EJ40 disadvantaged communities would open up opportunities for additional funding and resources here**. And the remedy as it currently stands will force future generations of Berkshire County to bear significant costs, having had little to no say in the process to date. To this point, GE may be counting on the total erasure of public memory around its legacy pollution and the arsenal of tactics it has used to minimize accountability or public scrutiny. But this letter represents a collective voice across generations: those of us who are old enough to remember the days of GE in Pittsfield, and those of us whose future lies ahead.

The time has come for GE to be held to account for its harmful legacies in Berkshire County and right the course. We must not allow for the reckless disposal of PCBs today - accomplishing what we are now learning will likely be only a 20% reduction in contamination levels - and retraumatizing our community in the process. Please consider the need for an environmental justice paradigm here in Berkshire County, and the opportunity such a reframing affords you: it is the chance to oversee a cleanup of the Housatonic River for which the EPA can feel truly proud.

Julia Thomas, MA

Co-Director, Clean Berkshire Collective

Public History & Interdisciplinary Research Consultant, Monterey, MA

CO-SIGNERS (88 total)

Debra Kelly

Co-Chair, Lenox Against the Dump, Lenox, MA

Jared Weber

Co-Director, Clean Berkshire Collective

Co-Chair, Lenox Against the Dump, Lenox, MA

Phoenix Haynes

Co-Director, Clean Berkshire Collective, Lenox, MA

CO-SIGNERS CONTINUED

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Citizens For PCB Removal, Pittsfield, MA

Audrey Cole, President, Housatonic Environmental
Action League, Inc., Cornwall, CT

Tim Gray, Lee, MA

Seth Pitman, PhD, Clinical Psychologist, Austen Riggs
Center (Stockbridge)
PTSD Expert Witness, Monterey, MA

Elizabeth Roberts, PsyD, Clinical Psychologist
West Stockbridge, MA

Sky Esquivel, Lenox, MA

Barbara Woike, Stockbridge, MA

James McNamara, Stockbridge, MA

Gail Ceresia, Professional Wetland Scientist,
Registered Sanitarian, Soil Evaluator, Lee, MA

Jane Burns, Lee, MA

Paula Dowling, USAF/RETIRED, Lenox Dale, MA

Mary Daire, Pittsfield, MA

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Dennis Field, Lenox, MA

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Cynthia Zanconato, Lee, MA

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Verena Smith, Lenox, MA

Marcia Slaminsky, Lee, MA

Laurie Kropkowski, Lee, MA

Kay Oft, Lenox, MA

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Alison Lotto, MA, MLIS, Librarian/Archivist, Lee, MA

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CO-SIGNERS CONTINUED

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Zachary Robbins, Stockbridge, MA

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Patricia Pellegrino, Lenox, MA

Samuel Joyce, Lenox, MA

Lisa Kane, Lenox, MA

Michelle Young, Mount Washington, MA

John Haynes, North Adams, MA

Thomas Lewis, Pittsfield, MA

Michael Nancollas, MD, Lenox, MA

Lynn Festa, Lenox, MA

Cara Walker, Lee, MA

Kaden Kelly, Lee, MA

Julien Ardouin, Lenox, MA

Jessica Nolet, Stockbridge, MA

Brian Berkel, Pittsfield, MA

Jean Louis, Great Barrington, MA

Sandy K. Lacey, Lenox, MA

Pamela Sandler AIA, Great Barrington, MA

From: [Clint Richmond](#)
To: [R1Housatonic](#)
Cc: [Vickash Mohanka](#); [Veena Dharmaraj](#)
Subject: The Massachusetts Sierra Club supports the rail transportation option
Date: Tuesday, January 30, 2024 9:50:42 AM

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

Dear EPA:

The Sierra Club has long been on record for highlighting the benefits of freight rail over trucks. Rail is safer, more energy efficient, less polluting, and relieves roadway congestion. Rail with its dedicated right of way is generally more reliable. Heavy trucks, on the other hand, are noisy and damage vital roadways.

The Housatonic project in particular would benefit since traffic is already a serious issue in the region during the summer. Given that the affected towns have suffered for decades from PCB contamination, it would be unfair to add avoidable truck pollution to their exposure burden. Tourism in the Berkshires is a leading economic sector that relies on an image of recreation and nature. Hauling trucks with contaminated sludge could only hurt this image and its economy.

The EPA and GE should not only fairly consider rail but should choose it because it is the best option for the Housatonic situation.

Sincerely,
Clint Richmond & John Kyper,
Co-chairs, Transportation Committee
Massachusetts Sierra Club

From: [Amanda](#)
To: [R1Housatonic](#)
Subject: Transportation plan
Date: Wednesday, January 31, 2024 8:48:57 PM

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

Greetings.

My family and I are residents of Lenox, Massachusetts, and I am writing you to urge you to continue to advocate for transportation of the PCB waste via rail, rather than trucks. It will be safer, more secure, probably less expensive, quieter, and less polluting (with less noise, exhaust, and possible PCB contamination!).

This is a beautiful area which relies on tourism for much of its income. So many trucks on our often busy roads would just cause problems, in various ways!

Parker Rodriguez, attorney for the Housatonic Railroad, brilliantly summarized how preferable and rational rail (rather than trucks) is. Please give his advice credence!

It is a sickening situation we find ourselves in, through no fault of our own. Frankly, GE and Monsanto owe the central and southern Berkshires far, far more than they are conceding. It is criminal.

Please do the right thing and help salvage and protect our environment, our health, and our well-being, for not only our sake not for the sake of future generations of all living beings here in this special region.

Thank you.

Amanda Schenker

██████████
Lenox, MA ██████████


[Sent from the all new AOL app for iOS](#)

From: [Amy Lafave](#)
To: [R1Housatonic](#)
Subject: Comment on GE transportation and disposal plan
Date: Thursday, February 1, 2024 4:18:40 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,

Let me add my response to the overwhelming number who believe that General Electric has to go back to the drawing board and consider rail as the safest and least disruptive method of transporting dredged PCB sediment.

Amy Lafave

Lenox Dale MA

Sent from my iPhone

From: [Andrea Pignatelli](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com
Subject: Call to Action re: PCBs
Date: Monday, January 22, 2024 2:17:42 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,

My name is Andrea Pignatelli-Simons and I'm a resident of Lenox MA. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed "Rest of River" Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the "Rest of River" clean-up project. In alignment with formal comments submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE's 13-year "Rest of River" clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.

The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the

current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

- Greenhouse emissions (drastically reduced with rail)

- Noise pollution (drastically increased with use of trucks)

- Safety, including the risk of pedestrian accidents (rail is much safer)

- Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure

- A real feasibility study on the use of rail, which takes into account all of the relevant details, including that:

 - very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks

 - the argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

I do not think transporting the PCBs by truck is the safest option here. It may be more cost effective but what about the risk of PCB contamination from something that leaks, tires that have been contaminated from the soil, etc. There has already been enough damage from GE dumping this into our river, let's not cause anymore.

Sincerely,

Andrea Pignatelli-Simons

██████████
Lenox MA ██████████

From: [Ani Grosser](#)
To: [R1Housatonic](#)
Subject: Upland Disposal Facility, Lee Ma
Date: Monday, January 22, 2024 9:10:23 PM

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

Hello:

We are long-time homeowners in Lenox, MA. We live about 1/2 mile from the Housatonic River, [REDACTED].

I ask you, our Environmental Protection Agency, to protect us by taking ALL of the PCBs in our river to a facility that can properly treat them. It is criminal to place these supposedly less hazardous chemicals, near Wood's Pond, and on top of an aquifer. Less Hazardous is still hazardous.

GE has gotten away with so much.

I implore you, our Protection Agency, to protect the people in this area and the beautiful precious wildlife along our river.

In advance thank you for your attention,

Sincerely,
Anne Nadler Grosser
William E. Grosser


From: [Anne Ferril](#)
To: [R1Housatonic](#)
Subject: General Electric Company's October 31 plan
Date: Thursday, January 25, 2024 9:49:10 AM

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

I want it to be known that I oppose the plan that is now being considered.
I am against trucking and I am opposed the dumpsite in Lee.

I urge the EPA to revisit the plan and to respond to residents concerns.

Anne Ferril


Stockbridge MA

January 29, 2024

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

**Re: GE-Pittsfield/Housatonic River Site Rest of River (GECD850)
On-Site and Off-Site Transportation and Disposal Plan**

Dear Mr. Tagliaferro:

As a 42-year Lenox resident and homeowner, I want to register my grave concern with General Electric's Rest of River (ROR) PCB Transportation and Disposal Plan:

Potential Impact on Human Health: GE's health and safety concerns appear to be limited to one-half page (out of 57) and exclusively to ROR workers. Berkshire County residents already suffer from a high rate of cancers. It is imperative that GE safeguard human health by taking advantage of all possible methodologies and mechanisms to limit the trucking of toxic waste through our communities. GE's plan posits numerous reasons why GE is opposed to rail transport, all citing efficiencies; when in fact, maximizing rail usage is the best defense against excessive trucking on our roads and streets of toxic waste destined for off-site disposal. GE must prioritize quality of life ahead of its bottom line.

Rehabilitating Environmental Damage: GE's ROR plan utterly omits remediation that will be needed to restore altered toxic waste landscapes and haul roads following decontamination. Utilizing and maximizing hydraulic dredging and conveyance measures as well as centralizing staging areas would limit environmental impacts and further reduce truck traffic as well. Woods Pond is a lovely stopover for migrating Canadian geese and equally lovely hiking venue for visitors and residents like me. Restoration of the health and beauty of all removal and staging areas by clearing, grading, re-seeding, re-planting is integral and essential to our flora and fauna, human health, property values, and even livelihoods, as the Berkshires are an arts, entertainment, and recreation resort destination.

We are a thriving but small community. GE's ROR Plan comes across as self-serving and perfunctory compliance with federal and state requirements. The EPA is our only bulwark against GE's apathy. Thank you for your consideration.

Respectfully,



Anne M. Moore

██████████
Lenox MA ██████████

From: [arun pandey](#)
To: [R1Housatonic](#)
Subject: Appeal
Date: Sunday, January 28, 2024 7:07:28 AM

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

It will be so sad to see all the PCB via truck definably not please please do do transport via truck please use Rail Rail and Rail
Thank you



From: [Barbara Shickmanter](#)
To: [R1Housatonic](#)
Subject: Rest of River Cleanup Concerns
Date: Saturday, January 27, 2024 7:00:45 PM

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

We join with others who are surprised by GE's seeming lack of regard for the use of rail for the PCB cleaning. The recent discussion about the advantages that rail would have on safety and traffic concerns is enlightening and deserves attention and consideration.

We live in the area that is in close proximity to the truck routes that the cleanup would involve and this plan seems to potentially further the damage that has already been done by the PCB situation to our local communities. Thank you for considering our concerns.

Barbara and Bruce Shickmanter


Lenox, MA 

From: [Barbara Mahony](#)
To: [R1Housatonic](#)
Subject: Cleanup
Date: Saturday, December 30, 2023 2:38:46 PM

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

I live in Pittsfield and I urge you to provide rail service to remove the contaminated soil. Trucks SHOULD NOT BE USED.

Barbara Mahony

From: [Bonita Bertocci](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com; select-board@town.lee.ma.us
Subject: Rest of the River General Electric T&D Plan
Date: Saturday, January 27, 2024 6:37:47 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,

We are Bonnie and Louie Bertocci and we live at [REDACTED] in Lee. We have lived here since 2000. It's not a wealthy neighborhood but it's quiet, peaceful and scenic with a beautiful state forest just about a half mile from us. With this public comment submission, we are asking the representatives from R1 of the EPA require a full rewrite of the currently proposed "Rest of the River" Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023 and also that the EPA extend the comment period to allow for more citizens' input, given the critical importance of the matter and near universal local opposition to the plan.

We strongly urge the EPA to look into the transportation of the toxic waste to be shipped by rail and not by trucks! Furthermore, we implore you to rethink the disposal of toxic waste into a facility that is in our neighborhood! The public had no chance to make our voices heard as opposing this proposed dump. We are worried about our health and that of our neighbors, many of us have grandchildren who visit regularly and also our pets and wildlife that call our neighborhood home. The name UDF is just a "pretty" name for a toxic dump which is in close proximity to many people! This is a travesty! There is no amount of money that will make up for the impact this whole plan will have on our lives, our property and the environment.

Another concern is the value of our property with a toxic dump just up the road. We are getting to that stage in life where we are talking about what our next move will be. Who will be anxious to buy our property with a toxic dump just up the road?

Another huge consideration is that the proposed dump would be sitting on an aquifer! This just doesn't make any sense to us. We feel the EPA should protect the aquifer as well.

The entire proposed plan and explanations we have heard regarding this plan, make it seem like it was not thoroughly thought through and now the originators of this plan have put the cart before the horse and they are now playing catch-up! We expect better than this! Please help us make our voices heard!

Sincerely,
Bonnie and Louie Bertocci

Sent from my iPad

From: [Brian Berkel](#)
To: [R1Housatonic](#)
Subject: Housatonic River Planning
Date: Thursday, February 1, 2024 6:21:41 AM

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

I live on [REDACTED] in Pittsfield. My family and I live south of the intersection with Joseph Dr. According to the latest maps, the only staging area actually located along East New Lenox Rd. will be directly across from my home in a meadow designated as a bird and wildlife reservation. These plans will impact my family, my home and my neighbors quite heavily.

I have been engaged with the public comment process for several years and have submitted comments and spoken at open forums. All along, accepting that this project was going to happen, my concerns were about the transport of the toxic materials. I never received an answer about how this was going to happen. I couldn't even be told what the routes would likely be or what kind of trucks would be used.

The current reports confirm exactly what I expected.

I am very concerned about the impact the transportation of these toxic materials will have on my community.

East New Lenox Rd.(particularly in the area between Anita Dr. and the Lenox town line) is very susceptible to erosion due to a pervasive water run off from the mountain on the east side of the road. This stretch of road is already notoriously prone to potholes. The records of repair, complaint and projects should be verifiable through the Pittsfield Highway Department. I have worked around construction sites and equipment for decades and my confidence in the report's claim that the materials will be dry, the trucks will be "lined" and covered and the operators will be monitored is weak. I know that over the course of the years this project will be in operation, there will be constant spillage all along the route to Lee. Especially considering the rough conditions of the road, that toxic material will be sprinkled, a little at a time, across our front lawns, where our gardens grow, where our dogs play and where our children wait for their school bus. Let alone the health and safety concerns, what will this do to our property value (especially if someone tries to sell during this 10 year project period)?

According to your maps, there are several staging sites on the west side of the river. I implore this commission and decision makers to reconsider the staging areas on the east side be relocated to the west side, especially considering the rail tracks are on the west side. There appear to be plans to establish an infrastructure on the west side to access the designated westside staging areas already. This will eliminate impact to the East New Lenox Road community almost entirely.

We have also heard that this project will require the removal of trees along the river. What exactly will that entail and what should we expect? We should be informed about how that will look too.

Please work with us on this.

Brian Berkel
[REDACTED]

From: [cara walker](#)
To: [R1Housatonic](#)
Subject: Public Comment on Rest of River General Electric T&D Plan
Date: Wednesday, January 31, 2024 3:45:47 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 am cara walker, at [REDACTED] lee ma. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed “Rest of River” Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the “Rest of River” clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE’s 13-year “Rest of River” clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.

The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

1. Greenhouse emissions (drastically reduced with rail)
2. Noise pollution (drastically increased with use of trucks)
3. Safety, including the risk of pedestrian accidents (rail is much safer)

4. Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure
5. A real look at what staging infrastructure and property access rights will be required, which are likely to be very similar regardless of use of rail vs trucks

The argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams.

There are also many benefits to the use of rail that are not considered, including the fact that with use of rail, remediation can begin before the dump is constructed; and the positive implications that come with long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

Thank you for your time and consideration.

Sent from my iPhone

From: [REDACTED]
To: [R1Housatonic](#)
Cc: [Attny Lori Robbins](#); [Christopher Ketchen](#)
Subject: Housatonic's Big Dig
Date: Friday, January 5, 2024 9:05:18 PM

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

Hello Rest of the River

I am sure many Berkshire residents feel a combination of being sad-mad to the point of incredulity and resignation. This paradox of digging up, transporting and reburying hazardous waste, is beyond ironic and only makes sense from a 'follow the money' point of view !

These dangerous chemicals still retain traits that caused pollution in our waterway. Now the short sighted solution is to transport them along road and rail, disbursing nastiness along their pathway.

Although science has determined these oils are destined to dissolve after 100years. A small collective of Berkshire notables, were seduced into an agreement; that the best way to permanently cap 60 year old toxic sediment, is to take it on a scenic drive; only to return back to the earth, albeit in a slightly different location, disappointingly back alongside the Housatonic River ...

Brings to mind lyrics from an old folk song by Peter Paul and Mary; "Where have all the flowers gone - oh when will they ever learn ?"

Apparently the learning did not come to us soon enough

Regrettably,
Carlene Tavares

From: [Caroline Young](#)
To: [R1Housatonic](#)
Subject: RE: C.M. Young - Public Comment on Rest of River GE T&D Plan
Date: Monday, January 29, 2024 4:39:03 PM

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

Dear Mr. Tagliaferro:

I am Caroline Meyer Young. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed Rest of River Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan, especially the UDF dump facility in Lee.

This is an articulation of my years long support for the integration of rail transport in the utterly inadequate Rest of River clean up project. As six affected towns have already formally stated, I believe rail should be elevated to the status of the primary, if not exclusive mode of transport, along with disposal outside of Berkshire County.

The plan as currently written is inadequate, lacking critical, incomplete and misleading factors necessary to execute the less than thorough clean up of the Housatonic River and its environs. Rail transportation of the fraction of PCBs being removed is the safest and most efficient means of transport and all of it should be sent to a licensed disposal facility outside of Berkshire County, eliminating the UDF dump.

Furthermore, the exclusion from the T&D plan of fundamentally relevant considerations on quality of life issues contributes to the plan's clear and consistent lack of respect or acknowledgement of the well being of our population, just as GE's pollution of our river and dumping in neighborhoods has established for decades.

Sincerely,

Caroline Meyer Young

██████████
Lee, MA ██████████

January 24, 2024

To: R1Housatonic@epa.gov

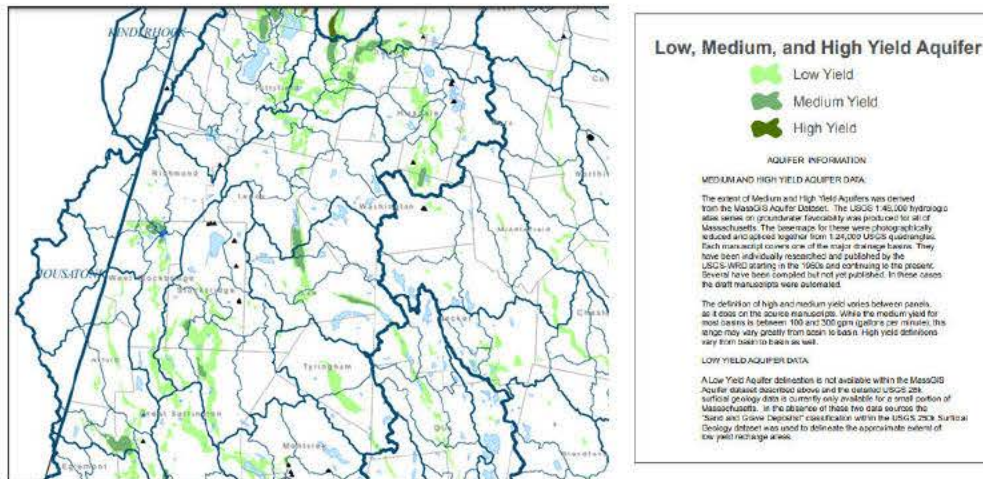
Mr. Dean Tagliaferro

EPA New England

10 Lyman Street, Suite 2

Pittsfield, MA 01201

A Concern: Largest Aquifer in Berkshire County Underneath Proposed PCB Dumping Ground



<https://www.mass.gov/doc/map-1statewideaquiferpdf/download>

As you can see from this aquifer map of Berkshire County, there currently is a large fresh water resource underground the proposed dumping/storage area for "PCB Rest of the Clean Up" waste. This is troubling and not a good site for waste. As temperatures increase, surface water decreases and many communities around the United States are now switching to drawing from aquifers. Groundwater can become contaminated with dust, runoff, spills, acid rain and flooding. We should protect our aquifers - and that does not mean putting plastic over them in hopes that it holds. Cherish these resources and find a more suitable site. Water is a sacred resource.

The EPA is very aware of the need for diversification in the community water supply. This article (<https://www.epa.gov/arc-x/climate-impacts-water-utilities>) outlines how the EPA encourages local towns and counties to employ a variety of means for water resources in the face of climate change. Basically, we don't know what is coming at us in regards to climate change, therefore, we should guard the integrity of the aquifer in Lenox - the largest in South County. Many of the communities affected by the PCB's in the Berkshires don't even have access to significant aquifers in their towns.

In conclusion, placement of the PCB waste on top or in the vicinity of a Berkshire aquifer jeopardizes our ability to diversify our resource water portfolio. Transport the dredged material by train out of the Berkshires away from the aquifer.

Respectfully,
Carolyn Guenther King

Lenox, MA

From: [Catherine McCabe](#)
To: [R1Housatonic](#)
Subject: US EPA Housatonic River
Date: Tuesday, December 5, 2023 7:36:39 PM

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

December 5, 2023

To Whom It May Concern,

In this increasingly corporate dominated culture we live in, it isn't a surprise that the EPA has changed over the years to do the corporations bidding. However, that doesn't make it right. The EPA would be wise to demonstrate to all of the citizens of this country that it remembers why it was formed and what it is charged to do, protect the environment. The proposed plans for a PCB dump in Lee, Ma, a town in the heart of the Berkshires, was negotiated with 4 individuals – the Lee select board - behind closed doors without the knowledge of the citizens of Lee. This dump will impact the people in Lee, and they had no voice.

The EPA has not shown any interest in exploring alternatives proposed by the Lee citizenry, simply dismissing them. Alternatives might cost GE more money, but would definitely be in the interest of the environment and the people who live here.

The recent informational meeting where a GE spokesperson presented GE's plans to truck the dredged PCBs throughout Southern Berkshires is another example of the expediency and lack of concern and thought for the community. Even though there are trains that run along the Housatonic, trains were never considered. Trains would cut down on the possibility of spills and accidents.

We need an EPA that will protect the community's interest. We love living here, we love our environment. For many, perhaps most directly or indirectly, our livelihood depends on the health and beauty of the Berkshires.

Let's put this plan to rest, and get behind exploring better options, healthier options.

Catherine McCabe

[REDACTED]

Lee, MA [REDACTED]

What I want to see from

PCB transportation plan

To the editor: Having attended a meeting at Lenox Town Hall presented by engineers hired by the town to help formulate its response to Rest of River plans (“Tech consultants urge pumping and rail for Rest of River PCB transport from the Housatonic River,” Eagle, Jan. 24), I now feel prepared to submit my comments on GE’s Transportation and Disposal Plan.

I will write and request that the number of staging areas be held to a minimum, ideally two. One at the Upland Disposal Facility and a second in South County toward the end of river cleanup. Further, hydraulic extraction and conveyance should be used to move water saturated contaminated soil (mud) to the staging areas via pipe. Solid material produced at the South County staging area destined for the UDF should be transported to the UDF via train. In addition, any solid material produced at a staging areas destined for out-of-state landfills should be transported there by train.

The debate of train versus truck overly simplifies the true nature of the challenge. Staging areas will be used to reduce muddy water to solid material suitable for road or rail transport and eventual disposal and to treat the separated water. Limiting the number of staging areas and requiring General Electric to pump to them directly from the river will greatly reduce the need for much of the local transport.

Residents from south Pittsfield to South County should email this message to R1Housatonic@epa.gov before the Feb. 1 deadline and make clear they want to minimize the impact on our quality of life for the next 13-plus years resulting from the dredging and transport of Housatonic river mud.

Unfortunately, the time to debate doing this project has long passed, as has the time to debate having or not having a local dump (known as the Upland Disposal Facility). We now can only try and influence how these projects impact our communities.

Chuck Koscher, Lenox

Public Comment on GE Transportation & Disposal Plan
-submitted by Clare Lahey, [REDACTED], MA

Dear EPA Region 1,

Please make sure that GE delivers a T&D plan that has the least impact on the community. I feel that after years of being subjected to the toxic river flowing just 300 feet from our home, [REDACTED] and having lived a healthy active life, (non-smokers, athletes, physically fit), that in our old age, we should not be subject to heavy truck traffic on our street, carrying PCBs to the nearby UDF.

We are anxious to see the river cleaned up ASAP. We worry daily about the possible health hazards in our home and wonder if it's safe to leave to our children for their future enjoyment. Our children, grandchildren, and great-grandchildren love visiting the old family homestead, which has been in the family for over 100 years.

The railroad runs by our home 4 times a day. We love watching the trains and would welcome more train traffic. It seems that rail cars carrying dewatered sediment and soil to a distant certified hazardous waste site would be the most efficient and safest method of transport. Sludge removed from the river hydraulically, which would be in need of dewatering, could be transported to a central processing point in tanker cars. As noted by the Housatonic RR in their letter to the EPA, ***Intermodal containers allow for use of multiple modes of transportation (e.g., truck, railroad) without handling of the material itself when changing modes and can hold approximately 15 to 20 tons of material per container; six 20-foot intermodal containers fit on a typical 60-foot railroad flat car.*** This method should provide the least exposure for the remediation workers, as well as any passersby.

STAGING AREAS: GE is asking EPA for permission to adjust the T&D plan as they progress from RU to RU. GE should be directed to complete the investigative and design work needed to develop a realistic T&D plan. Critical to determining routes is the location of staging areas. Access to private properties needed for remedial operations should have been completed before now. These are shown only in Reach 5A in Pittsfield. Evidently, the T&D for that reach was determined during the secret negotiations leading up to the Revised Final Permit. Access to most Pittsfield residential streets has been blocked.¹ Apparently, the staging areas for Reach 5A were also determined. The *Plaintiff* representing Pittsfield seems to have conferred with their city government, whereas the other 6 *Plaintiffs* were sworn to secrecy, never communicating with their constituents. (The members of the 5-Town Municipal Committee were not allowed to confer with their town officials on any matters relating to the cleanup during the secret negotiations .)

¹ *The restricted roads consist of those identified in Section II.H.11.c of the Revised Final Permit – namely, Brunswick, Kenilworth, Warwick, and Chester Streets; Noblehurst Avenue; Revilla Terrace; and Shetland, Clydesdale, Pinto, Palomino, Anita, Lucia, Quirico, Joseph, and Eric Drives – and are illustrated on Figure 3-1. Avoidance of these roads will be discussed further in*

*GE's upcoming Quality of Life Compliance Plan, scheduled to be submitted to EPA in **December 2023(???)***

HYDRAULIC TRANSPORT is a major component of the T&D plan. GE claims that *...if the hydraulic transport approach can be implemented, over 60% of the estimated total remediation volume would be transported to the UDF without additional truck traffic (except for any subsequent off-site disposal truck trips, as discussed in Section 4).* GE has to prove that their proposal for hydraulic transport is implementable. **Hydraulic transport was an important factor in the EAB's decision to support GE's contention that the UDF was the best choice for disposal.** GE's most convincing argument before the EAB was that the major portion (over 60%) of the sediment could be transported by pipeline, reducing the number of truck trips and expediting the process.

TRANSPORT OF SEDIMENT CONTAINING GREATER THAN 50mg/cm TO THE UDF SHOULD NOT BE ALLOWED. GE refers to the PCB's >50mg/cm being pumped to the UDF, where they will be dewatered prior to truck transport from the UDF to an off-site disposal facility. I don't know how this aspect of the T&D plan can be justified, considering that the dewatering process is just as much, or more, of a threat to the environment than the actual placement in the dump.

It seems that hydraulic transport of sediment containing a mix of low/ high level PCBs is only feasible when combined with rail cars transfer offsite.

ROUTES GE has proposed Roaring Brook Road to Woodland Road, contending that: *These routes mainly use rural roads with limited residential development.* Please recognize that these roads are **heavily used as trails bordering the largest state park in MA. They are the only access to the huge network of trails on October Mountain. The impact on the community is huge. This passageway has been impassable for vehicular traffic for years, purposely left in this state for the protection of the frequent users. Not only locals, but people from all of MA use this route for walking, running, mountain biking, snowmobiling, cross-country skiing, horseback riding, dog waling, and access to the hiking trails. It is heavily used by the community every day. Obviously, truck traffic would create a very dangerous situation.**

Thank you for allowing my participation in this process.

Clare Lahey

From: [REDACTED]
To: R1Housatonic
Cc: Paul.Mark@masenate.gov; rep.smitty@mahouse.gov
Subject: GE Transportation and Disposal Plan
Date: Tuesday, January 30, 2024 9:40:36 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,

The cursory study into the rail transportation option to remove PCB contaminated soil and sediment is not acceptable. The proper research needs to be for this option and done in a timely manner. The delays, posturing, and evasive tactics GE has shown to date are not acceptable, especially as our family and neighbors who live along the Housatonic River continue to suffer from toxic quantities of PCBs in the nearby water and flood plains, and the wildlife and aquatic systems that help combat climatic warming and the health of our planet remain under constant siege.

Having attended several “informational” meetings regarding the remediation and transportation options for the PCB laden river and surrounding areas, I am reminded of what other communities have had to endure from the prolonged delaying tactics of large corporations who can well afford to remediate toxic areas that they created. The documentary/movie “Erin Brockovich” has become even more significant to us here in the Berkshires as we see the same corporate tactics unfold.

Time ... and lives ... are wasting away. Surely GE can and should be doing a much better job of honoring both their former “We bring good things to light” slogan and their current “Building a World That Works” marketing campaign.

Claudine Chavanne

[REDACTED]
Lenox, MA [REDACTED]

From: [REDACTED]
To: [R1Housatonic](#)
Subject: Request for EPA to revise plan for PCB toxic dump in Lee Massachusetts
Date: Wednesday, January 31, 2024 4:05:38 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 resident/.

Owner of the town of Lee Massachusetts.

This letter is to share my concerns about the current plan for G.E. to partially remove the PCBs from the Housatonic River.

The current plan to truck the PCBs through our towns and city streets to a disposal site located in Lee Ma. Is to say the least, frightening.

I am asking the EPA to reconsider and revise the current plan. Moving some of the waste will create 2 toxic locations instead of 1. Not to mention carting them by truck through our communities.

There is great potential for contamination of local water supplies given the location of the new dump site. Above an aquifer in Lee Township. Yes, we've been told that the liner will last long after I'm gone from this Earth but, nothing is 100 percent forever. Especially with the climate changes our world is facing. It could very well fail before the PCBs have lost their toxicity. Moving the PCBs through populated areas (our towns) exposes our people, animals and wildlife to breathing in PCB particles in the air. This could have a devastating impact on all. Please think about the health of our existing and future community. The lives of our children and their children and so on.

Thank you for hear out my fears and concerns. I hope the EPA will be diligent in guarding our community and environment by denying the forward movement of this project.

Sincerely,
Corrin A. Pasquerella
Resident of Lee Ma.

Sent from my Verizon, Samsung Galaxy smartphone

From: [Daniel Schenker](#)
To: [R1Housatonic](#)
Subject: Transportation Plan
Date: Wednesday, January 31, 2024 8:58:06 PM

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

As a Lenox resident I'm writing to affirm my support for the use of rail to transport as much contaminated soil as possible to the UDF, as recently outlined in a letter to EPA from our town Select Board. Thank you.

Daniel Schenker

[REDACTED]

Lenox, MA

From: [Laura Daniela Panche Mejia](#)
To: [R1Housatonic](#)
Cc: [Smitty Pignatelli](#); cleanberkshirecollective@gmail.com
Subject: Comment on Rest of River General Electric T&D Plan
Date: Wednesday, January 24, 2024 7:23:59 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,

My name is Daniela Pignatelli, a concerned Lenox, Massachusetts resident. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed “Rest of River” Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the “Rest of River” clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE’s 13-year “Rest of River” clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

- The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.
- The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so

incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

- Greenhouse emissions (drastically reduced with rail)
- Noise pollution (drastically increased with use of trucks)
- Safety, including the risk of pedestrian accidents (rail is much safer)
- Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure
- A real feasibility study on the use of rail, which takes into account all of the relevant details, including that:
 - very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks
 - the argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

Sincerely,

Daniela Pignatelli

From: [Darren Blaney](#)
To: [R1Housatonic](#)
Subject: Against GE's PCB Dump in Lee, Massachusetts
Date: Saturday, January 20, 2024 12:57:22 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:

I urge the EPA to stop its collusion with GE and instead halt GE's construction of a massive toxic PCB dump in the heart of the Berkshires in populated area of Lee on the border with Lenox. PCBs are proven carcinogens with clear and present danger to human health. The proposed toxic waste dump is planned to be constructed close to the Town of Lee's watershed, only a few miles from its drinking water supply. The current plan to ship the most toxic PCB-laden soil out of the area via truck will incur additional risk to the residents of Lee, as the proposed truck routes are set to pass through residential areas and Lee's Main Street shopping district. If any of these trucks are involved in accidents, the results could be catastrophic for the residents of Lee and the surrounding towns, as PCBs are easily volatilized and can become airborne.

The EPA's current plan makes absolutely no sense: what is the point of spending millions of dollars to dredge the Housatonic River, only to move the toxic materials a mile and a half away, closer to the Town of Lee's water supply and multiple local residences. The plan as written will incur more risk to the residents of Lee and the surrounding towns than simply leaving the toxic material where it has been settling for the past 50 years.

In 2022, 60% of voters in the Town of Lee approved a nonbinding resolution to require our Town's Selectboard to rescind its agreement with the EPA and GE. The majority of citizens here do NOT want a toxic waste dump built in our town. We also do not want to have trucks transporting toxic waste through our town for the next 10 years, and we do not want our town to take on the burden of storing toxic soil in an "Upland Disposal Facility" for toxic materials that are currently located in other nearby towns.

I urge the EPA to end its plan to build a toxic waste dump in Lee, Massachusetts. The PCBs should either be shipped out of state via rail to a controlled federal facility far away from where people live, or the EPA should find another way to treat or remove the chemicals in the Housatonic River that will not incur health risks to the residents of Lee.

Thank you for considering this. Please see Josh Bloom's letter to the editor, printed in the Berkshire Eagle on December 5, 2023, below, which I fully support.

Sincerely,
Darren Blaney

Letter to the Editor of the Berkshire Eagle by Josh Bloom

The Environment Protection Agency must rescind its political decision to allow General Electric to build a toxic PCB dump in Lee in the heart of the Berkshires.

The EPA has widely questioned some of its agency's decisions and actions under the

previous presidential administration. In 2021, EPA Administrator Michael Regan wrote: "Manipulating, suppressing, or otherwise impeding science has real-world consequences for human health and the environment. When politics drives science rather than science informing policy, we are more likely to make policy choices that sacrifice the health of the most vulnerable among us."

The proposed "upland disposal facility" that GE wants to construct in Lee is yet another example of a hasty decision in the interest of a major corporation that has real world consequences on the environment and health and safety of the surrounding populations. The EPA has disregarded the pleas from the Berkshire residents. The EPA refused to participate in public forums organized by the Lee Select Board. The agency refused to participate in Lee Board of Health proceedings. It has disregarded the referendum and votes taken by the Lee townspeople. It has not sided with the townspeople's challenges in court.

It is time for the EPA to fully recognize that politics drove science rather than science informing policy in the decision to place the PCB dump in Lee. The result of the EPA's bad policy choices here will sacrifice the health of the most vulnerable among us unless the EPA reconsiders the plans to place a disposal site near the populations of Lee and Lenox.

Sent from Darren via technology invented on planet Earth

From: [Caroline Young](#)
To: [R1Housatonic](#)
Subject: RE: David Carrington - Public Comment of Rest of River GE T&D Plan
Date: Monday, January 29, 2024 3:52:26 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:

The source of the overwhelming dissatisfaction with the GE Rest of River transportation plan is the thousands of unnecessary truck trips through our local towns and roads to create a dump that no one wants, when the railroad goes right along the river where the work is and can, in the safest, most efficient way do the job without hazard, risk and disruption to the community.

Upgrade existing rail sidings, add new where needed, send the excavated PCB laden material out by rail to a licensed landfill: the problem goes away.

1. No UDP dump
2. No trucks over local roads
3. Use rail to licensed land fill
4. Problem Solved

Sincerely:

David F. Carrington

██████████
Lee, MA ██████████

From: [REDACTED]
To: [R1Housatonic](#)
Subject: Request for EPA to revise plan for PCB toxic dump in Lee, Mass.
Date: Saturday, January 27, 2024 7:19:06 PM

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

To our regulators at the EPA:

I am an owner/resident of the town of Lee, Mass. I am writing this letter to express my concerns and dis-satisfaction with the current plans for GE to partially remove PCB's from the Housatonic River and move them by truck through our towns and city streets to a disposal site in the town of Lee, Mass.

I am respectfully asking the EPA to revise the current plan and consider other alternatives. My reasoning for this request includes:

- The Housatonic River will still contain PCB's. It does not make sense to move some of the contamination from one location to another (Lee dump), thereby creating two toxic locations.

- The proposed dump in Lee, Mass. is above an aquifer, potentially leading to contamination of local water supplies. While the dump is supposed to have a lining that will last forever, given that nothing is fool proof and the unpredictability of future climate changes, it is highly likely it will fail before the PCBs are no longer toxic.

- Moving the PCB's through populated areas exposes citizens to breathing in PCBs in the form of suspended particles in the air (dust) and as an invisible vapor (volatilized). Thereby adding to the already detrimental impact on human and wildlife.

I implore the EPA to prioritize the protection of our Beautiful Berkshires, the health of the community, and that of future generations by rejecting General Electric's plan to dump PCBs in Lee, Massachusetts. Instead, I urge the EPA to explore safer and more sustainable alternatives for the removal, and disposal of these hazardous substances. As your website says about your Best Management Practices: "the selection (site) considerations will include community concerns". I along with many

others, am loudly expressing my concerns!

Thank you for considering my concerns. I hope the EPA will stand firm in safeguarding our environment and community by denying this detrimental project.

Sincerely,
David Pasquerella
Lee, Mass.

From: [David Walker](#)
To: [R1Housatonic](#)
Cc: [David](#)
Subject: Upland Disposal Facility in Lee Massachusetts
Date: Thursday, December 28, 2023 9:31:16 AM

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

Dear EPA &GE,

I'm a life-long resident of Lee and am extremely disappointed with your decision to create a PCB dump in the town of Lee. Unfortunately, we're now stuck with a decision made by an agency that is supposed to protect our environment and its people. The UDF is not what the people of Berkshire County collectively want. The EPA and GE made decisions concerning the UDF behind the scenes and were never agreed to by the people who have to live in Lee and surrounding towns.

Unfortunately we have to live with the decisions made by the EPA and GE (Yes you should both be ashamed of yourselves). BTW GE is making record profits right now but they can't take the large sums of money they're making to clean up a mess that they created! Because we've had this decision jammed down our throats, we have to deal with a plan that GE and the EPA devised to stir up PCBs from the Housatonic River (From Pittsfield through Gt. Barrington), and move that material from the river to the UDF). I was at the meeting where the GE representative presented the plan. To me, the presentation was geared towards how trucking PCBs is the "best way" to transport this material when in reality it all comes down to how much it will cost and what is convenient for GE and the EPA. Rail was not even considered!

In summary, EPA & GE please reconsider what you're doing to our county and stand up for what is right. Money should be no object when you're trying to protect the environment. Use hydraulic pumping and rail and as much as humanly possible. You owe it to the people of Lee and surrounding Berkshire County towns. If it was your backyard, how would you want the clean-up to proceed?

Sincerely,
David R. Walker Jr.

██████████
Lee, MA ██████████

Dear Mr. Tagliaferro,

I attended the public presentation of GE's Transportation and Disposal Plan on November 28, 2023, at Lee High School, Lee, MA. I found the document and the presentation itself to be vague, disingenuous, flawed. I am asking R1 of EPA to require that GE resubmit the entire document. My opinion is that an entity other than GE should be involved in rewriting this plan, one that will not be biased.

GE has not done a comprehensive cost-benefit analysis on the use of rail vs. trucks. I believe rail is the safest option for transport of contaminated material. Staging infrastructure and property access will be required regardless of the use of rail vs. trucks. The impact of 40,000 trucks on local roads for 10 to 13 years or more will be huge. The current document does not analyze or consider public concern with the following:

- greenhouse emissions with the use of trucks
- noise pollution with the use of trucks
- delays with truck transport due to summer traffic in the Berkshires
- delays due to unpredictable weather with climate change
- unforeseen accidents involving trucks
- damage to roads and infrastructure with truck use
- the use of trucks traveling main roads through Berkshire County to transport higher levels of PCBs out of state to registered facilities
- absolute responsibility from truck drivers for complete safety while transporting toxic waste - Will the tarps used be without holes or frayed areas? Will tarps be securely fastened to prevent dust from escaping? Will drivers always stick to established routes? There will not be a GE executive or a member of EPA riding in the truck.

The use of trucks is for GE's monetary benefit and convenience. GE makes billions of dollars in profit every year. GE could afford to construct or repair all sidings necessary for the complete use of rail. Why isn't the EPA demanding full financial responsibility to GE by using the safety of rail only? GE is the polluter!!!

The establishment of a toxic waste dump in Lee was agreed to by a small minority of people involved in the private RoR negotiations. And while I realize that mediation is a legal way to settle an issue and that the 5 Select Boards signed on, many thousands of voting residents in those 5 RoR towns did not receive personal consideration for an opportunity to voice an opinion or vote on this horrendous agreement. **WE DO NOT WANT A TOXIC WASTE DUMP!!!!** The RoR committee and the EPA are forcing this

on us. Since the dump was announced in 2020, has anyone at EPA considered how much this has contributed to emotional turmoil? The proposed dump and transportation routes have produced stress, anger, fear, anxiety:

- for the people who would see this massive mountain of toxic waste on a daily basis, drive by it, live near it and deal with property devaluation and health concerns
- for parents of children who attend schools on the proposed truck routes and would be exposed, for many years, to PCB dust on the school grounds as trucks pass daily
- for parents of students who would attend the schools within the 3 mile radius of the dump
- for the residents who live on the proposed truck routes
- for tourists who visit regularly
- for businesses located on the proposed routes
- for residents of assisted living facilities along the proposed truck routes

The idea that residents, especially in Lee and Lenox, are expected to accept the fact that part of the beautiful area surrounding October Mountain is possibly going to house GE's toxic waste, not our waste, GE's waste, is inconceivable. And all of this with the knowledge that the Housatonic River will still be polluted with GE's PCBs. Damage has been and will be done, emotionally and financially, to the people trying to accept the reality that a toxic waste dump might be established in the area they live in. This needs to be taken into consideration.

2000 residents in Berkshire County signed petitions against the use of trucks to haul toxic waste through our towns. A railroad system runs parallel to the river. And ownership of that railroad has expressed an interest in working with EPA on this issue. Isn't it time that the EPA begins to stop GE entitlement and hold the company completely responsible for the PCB pollution that has poisoned Berkshire County for decades?

Debra Kelly
Lenox, MA.

From: [Denny Alsop](#)
To: [R1Housatonic](#)
Subject: GE Transportation Plan
Date: Wednesday, January 31, 2024 8:01:22 PM

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

I was one of three citizens, in October 2023, who collected 437 signatures in Stockbridge on the petition, 'Stop The Trucks, Switch To Rail'. This was in response to GE's Transportation Plan of July 10, 2023.

GE's pointed omission of Rail in a presentation in Lee, on June 10, 2023, was experienced by many people in Stockbridge as being intentionally brutal. A common sentiment came from a woman who said, 'GE is sending a warning by omitting rail. A clean Up comes with a penalty of ten thousand truckloads of PCB sediments growling on our roads'.

Standing with a clipboard before the Stockbridge Post Office I conversed with people who said, 'we can't do this because we are scared.' But then hesitated and said, 'this is so important to our democracy, here - I'll sign'. Many were shocked that they were so poorly uninformed.

But the dominant experience I had over ten days, was meeting so many ordinary Stockbridge people who expressed anxiety and fear at GE's Transportation Plan. It seemed to be the GE presentation of trucking, trucking, trucking, and refusal to continue consideration of rail, which engendered this response in a Town with three cancer streets.

Many Stockbridge residents have a history of prior PCB exposure. I have exposure from canoeing on the River. The latest data shows that school aged children are most exposed to PCBs while inside their aging school buildings. Some of these buildings in our District are now closed.

We recognize that waiting for the bus, or recreating along our local roads may pose inhalation of volatilizing PCBs from the residue in soil of transformer oil from the 400 roadside pole mounted transformers containing PCBs. These 85 to 400 gallon units which were removed in the late 1970's from Great Barrington, Stockbridge, Alford, Sheffield and Monterey, were dumped by Mass Electric, under observation of MA-DEP, in the GB Municipal landfill - located across Rt 7 from MMRHS.

We must not assume that our PCB background levels are low. In the late 70s GE rushed to dispose of excess Pyranol, by giving it to Mass Electric which mixed it with 'Agent Orange' and sprayed their ROWs with it. But the greatest presence of PCBs in our midst is unrecognized; Of the total PCBs produced by Monsanto, only two percent were used as transformer oil. The balance is in our built environment in concrete, paints, ballasts, roads, tires, wiring, all of which volatilize inside of doors.

I question EPA's resistance to the established science which connects pcb volatilization to human exposure by inhalation. I heard Dr Hermandson's comment over Zoom, at the recent CCC Meeting in Lee, that the EPA acceptable PCB air levels were 25 times higher than cited norms of 0.2.

In 1991 I Co-founded HRI on return from Hudson's Bay, Canada where I was employed as a

'Registered Agent with the FBI for a Foreign Nation, The Crees of Northern Quebec'. Cree and Inuit Mothers had high PCB blood levels from 'LRAT' Long Range (thousands of miles) Airborne Transport of PCBs into their food-web of fish, seals and birds.

I believe that a great flaw in GE's failure to look at Rail, comes from the FEMA & MEMA predicted Climate Change Flooding of the 1000 acre PSA and inundating all access roadways and excavation works in reaches 5 through 8. All truck roads into the riparian PSA are subject, in a 10-year flood, to an average of 5 feet of submersion (the river banks are deeper), softening, and rapid PCB sediment transport over the Woods Pond dam in laminar flow to impactful attenuation in relatively pristine core one and two habitat in towns down river. EPA must examine rail based solutions to operations in and connecting to these aquatic environs.

Existing rail inside the PSA is surviving flooding, which suggests that rail sidings can be built and operated into impounded wetland (the PSA) with greatly less disturbance and subsequent sediment transport than payloaders, tracked excavator, trucking and truck roads. Future re-remediation of Climate Change meander cutoff will require future remediation, which rail infrastructure will facilitate.

Applying Climate Change Information must augment the Hydrodynamics and Hydraulics above Woods Pond Dam in flood. EPA must re-cover the FIRST section report from the H & H Modeling Design and Peer Review held by Morasco & Newton /Jonathan Raab Assocs. at Cranwell Resort in 2001.

Mimeographed handouts from this report contain a wealth of references to ANCHOR QEA's May 1999 flow and sediment transport study conducted during the May 1999 High Water Event at New Lenox Road. 'PCBs in sediment move in direct relationship to river water depth and velocity'; QEA found that High water moved between 100 and 1000 times more PCBs in fine sediment than low water at this test location.

This study was un-tampered with in Phase 1, but not in Phase II, according to Peer Scientists, who complained in 2001 about the reduction of the QEA 1999 data to a simplified bar code rendition. Subsequent computer programming concealed this sad event.

A component of GE's Transport Plan should be the Woods Pond Dam inflow predictions documented by USGS in the 2022 Housatonic River Basin Study compiled for the re-license of the Onyx Paper Hurlbert Dam.

GE's current Woods Pond Dam EAP is a dangerously misleading and inaccurate document, which does not reflect, even the 35 year old USACE and FEMA documents on which GE's engineers claim it is based!

How can EPA condone or supervise a cleanup operation using trucks, excavators, payloaders and their associated roadways and disturbance in the PSA aquatic environs, without Climate Updated Flood Potential documentation? Where is the current data? Are you concealing it? Dr. Charles Kenny said at our recent CCC Meeting that 'I don't trust GE, but I want to trust EPA'.

Best Wishes,

Denny Alsop

Stockbridge

From: [Denny Alsop](#)
To: [R1Housatonic](#)
Subject: Glendale, Existing rail bed (Berkshire Street RR)connection to Reach 7 G
Date: Tuesday, January 23, 2024 3:00:08 PM

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



Sent from my iPhone

From: [Denny Alsop](#)
To: [R1Housatonic](#)
Subject: Old rail bed connecting HRR track to River in Glendale
Date: Tuesday, January 23, 2024 3:04:07 PM

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



Sent from my iPhone

From: [Diane Carroll](#)
To: [R1Housatonic](#)
Subject: Comment period from ROR. Lee ma
Date: Thursday, December 14, 2023 10:20:38 AM

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

I have so much to say here, but let me start out by saying that my children and I lived right next to the river from 1977-1990. I had 3 children, two were born living with the river in our backyard living in a mobile home on Woodland Road in Lee, Ma. We then moved to [REDACTED] after my daughter Melissa was born. We lived within walking distance of the Housatonic river. My oldest son, Jason spent a lot of time in the river fishing with a net, catching the fish and bringing them home to eat for dinner. We were very poor. He used to complain that there was a lot of oil in the river. He and his sister Kelly spent a lot of time together fishing. Both children developed these horrible rashes and both needed to be seen by a dermatologist specialist who ordered strong medication. This happened for several years, each and every time they went fishing in the Housatonic river. Now, the Housatonic river is a PCB ridden cancer causing river. I am asking and requesting that any sediment that is dredged be taken by train out of state to a landfill as far away from civilization as possible. No amount of PCBs are safe. I am also a registered nurse. I feel strongly about this issue. I hope the environmental protective agency does their job the right way. Please, for our protection. My family and the people of Lee, Massachusetts deserve a good quality of life. This is our human right. Please EPA, do not take our rights away. I have personal experience that sickens me to think that my children and family suffered tremendously from GE's negligence. We were the innocent victims. GE saved money at my family and the Community' of Lee's expense. Please don't let this happen over and over again. Enough is enough

Thank you, Diane Carroll

From: [Diane Carroll](#)
To: [R1Housatonic](#)
Subject: Comments
Date: Wednesday, November 29, 2023 1:34:13 PM

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

It was disturbing at last night's meeting to see EPA siding side by side with GE! EPA is supposed to protect the environment!!! Please do your job. No amount of PCBS are safe. Who is really going to monitor the level of PCBS? EPA don't make another mistake! These big mistakes are causing unsafe living environments!! Do your job and do it right! Stick up for the people and wildlife. Our human rights are being violated!! We are not being heard.. it's not fair or right. Do the right thing so you can sleep at night. Thank you, Diane Carroll

From: [Don Weber](#)
To: [R1Housatonic](#)
Subject: RoR Comment
Date: Sunday, December 3, 2023 1:41:28 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 sure the current plan is not perfect, but perfect is the enemy of the possible. I do not understand why people believe that leaving a toxic river to our children is any kind of good citizenship, but I do not believe it is.

PLEASE, let us approve the plan then watch very carefully to see that they live up to their promises.

I live right by [REDACTED]. I assume the trucks will come right by my house. *I still want this done.*

None of us caused this, but it falls to us to make it right.

Thank you,

Donald A Weber
[REDACTED], Lenox

From: [Elizabeth Heller](#)
To: [R1Housatonic](#)
Subject: Transport and disposal of PCB from GE Plant in Berkshires MA
Date: Saturday, January 27, 2024 7:14:13 AM

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

1. GE created a toxic dump out of our beautiful community and then abandoned the community and left its mess and profound economic and environmental damage to one the most beautiful places in our country. (Do you want to live in a community with a PCB land dump? Do you want to spend your vacation there--with your kids?)
2. It is ludicrous to think that taking the poison out of the water and dumping it on land in Lee is any kind of solution; it's just moving the poison from one location to another; there should be NO DUMP anywhere in the Berkshires. It belongs in GE's backyard, not ours.
3. GE needs to remove the poison BY RAIL and take it completely out of our state, **all of it**, and not just move it around in the Berkshire's backyard.
4. Our taxes pay for the EPA to PROTECT us and our environment. A toxic landfill in the middle of this stunning landscape that depends on tourism for its survival is absurd and in direct opposition to the EPA's mandates.
5. If a landfill is the solution, GE can build a landfill in their own backyard and move the PCB's there. Better yet, If this dump is so safe, then GE CEO Lawrence Culp can build one in his backyard and move the PCB's there. That is what you are asking the Berkshires to do.

NO DUMP. NO TRUCKS. NO MORE COMMUNITY OR ENVIRONMENTAL SUFFERING (OR EVEN INCONVENIENCE) AT THE HANDS OF GE.

Thank you.

Elizabeth Heller, Pittsfield resident and local business owner
(whose mission is to empower kids and teens to self-manage their emotional and physical wellness through mindfulness practices. How can you possibly ask our children and their environment to live with a toxic dump?)

Elizabeth Heller
Creator and Owner





From: [Ellen Farris](#)
To: [R1Housatonic](#)
Subject: GE PCB transportation proposal
Date: Tuesday, December 26, 2023 10:17:43 AM

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

As a long time resident and employee of the town of Lenox, and recent homebuyer on [REDACTED] in Lenox Dale I am writing to express my concern over GE's intention to truck PCB waste to the disposal area. Discovering that the house I was buying was directly along the transportation route for waste from south county was quite disturbing and immediately sought more information. Like many others I feel that GE is again taking the easy way out rather than doing the right thing for the people of this community. With train tracks essentially paralleling the river being cleaned up it is essential that they use that resource. We do not need or deserve the additional noise and diesel pollution of, I believe, an estimate 38 trucks a day! Trucks present additional danger for children waiting for school buses, and walkers. It is an unacceptable solution and GE has not done their due diligence in using the already available train tracks.

Sincerely,
Ellen Farris
[REDACTED]
Lenox Dale

From: [Eric Zanconato](#)
To: [R1Housatonic](#)
Subject: Lenox/Lee UDF
Date: Thursday, January 25, 2024 7:40:03 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 Personnel:

We kindly ask that you strongly consider removing all volatile PCBs via rail far outside of the area. We feel this is the safest option available, although it may not be the most cost-effective for GE. We value public health and sustainability over cost-savings.

Thank you very much.

The Zanconato Household

From: [Eugene Zacharewicz](#)
To: [R1Housatonic](#)
Subject: Transport of PCB Material in Berkshire County
Date: Thursday, January 25, 2024 8:58:28 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,

I would like to add my voice to the other members of my community who strongly oppose General Electric's (GE) current proposal of transporting the PCB contaminated soil from various sites in Berkshire County by using trucks instead of by rail. It's ironic that after polluting our land and our waters, GE has decided their best option is to use a means of transportation that is the most polluting. On average rail is 4 times more fuel efficient than trucks and emits 75% less GHG emissions. I guess this should not come as a surprise. Since GE abandoned this area in the 1980's, it has done everything in its power to pay as little cost as possible for the damage that they have done. Even though we are the largest county in Massachusetts in terms of area, we have the smallest population, and we have limited resources. One of Berkshire County's greatest attributes is our natural setting that we have been blessed with, and which attracts people to come to our area. It is a source of income for so many businesses and people in our county. We owe it to these people and GE owes it to these people to do everything in their power to remediate this issue in a way that causes the least environmental impact.

Sincerely,

Eugene Zacharewicz
Pittsfield, MA

2-1-2024

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

RE: EPA # 677632 Comments- On-Site and Off-Site Transportation and Disposal Plan

Dear Dean and other EPA reviewers,

I support EPA's position which will require GE to provide an analysis of rail versus truck transport to out of state TSCA certified facility. In addition, I am requesting EPA to require GE to provide a net gain analysis of rail transport for all the PCB-laden soil/sediment out of state versus cost of construction of UDF and running the facility over the next 50 to 100 years. I also request EPA to put in writing who will be responsible for maintaining and running the facility and what the projected cost if any, will be to the taxpayers of Lee, Commonwealth of Massachusetts and/or the federal government. When the dump fails who will be the responsible party for mitigating the failure?

In addition, I request EPA to provide the reason why they are allowing GE to pollute over 300 plus acres of unpolluted land, which is located at the base of October Mountain between Woodland Rd and the Housatonic River within an ACEC, instead of requiring rail transport of PCB laden sediment to an already existing Certified TSCA landfill. Why has EPA waived the requirement of dumping less than or equal to 50ppm of PCB into the proposed UDF? Please demonstrate how this plan is beneficial to the health and safety of the public rather than out of state disposal.

The probability of spillage and contamination from trucking and/or hydraulic pumping to the UDF is extremely high, especially if the lines are filled with a sediment slurry and the pumps fail. How will the contaminated water be prevented from polluting the currently unpolluted land.

ARCADIS Figure 4-1 of the anticipated Travel Routes in Remediation Unit 5A shows several temporary roads and staging areas. Will there be less environmental impacts clearing of these areas than creating sidings for rail transport? Will there be additional expense for road improvements to New Lenox Rd, Roaring Brook Road, and Willow Hill Rd? If rail is used why not hydraulically pump the sediment to staging areas or treatment centers near existing and newly created sidings? The public does not want the PCBs to be trucked through their neighborhoods for concern of spillage, volatilization, road congestion, and noise.

In a previous GE report, volatilization of PCBs is going to be prevented by keeping the PCB laden sediment transported in a wet state. Yet in the Transportation and Disposal submittal, the sediment is going to be mixed with fly ash before it is moved to the UDF or transported out of state. How will volatilization be prevented? Please note that fly ash is considered an environmental hazard worldwide, since it generally contains organic pollutants, probable toxic metals like Se, As, B, Al, Pb, Hg, Cr, and radionuclides Uranium, and Thorium. I protest this dump because EPA will allow GE to dispose of many different contaminants into the dump from around the county and possibly the Commonwealth. The site is extremely permeable, with Carbonate bedrock over an aquifer. Science should take precedence over

politics. Clearly many local contractors stand to make money, but PCBs and other contaminants are forever chemicals and GE should not be allowed to dump their toxic waste on this land.

Why power wash the boulders for stream bank stabilization or stream channel use? If this activity is being conducted to remove contamination of PCBs and other hazardous compounds, where will the contaminated water go, or how will it be handled?

In conclusion, a permit has been issued prior to investigation of the UDF and the Housatonic Riverine system. The dump site monitoring has revealed high ground water so now EPA must waive the 15' separation from ground water regulation too. If the PCB clean-up is truly being done to protect the health and safety of the public, then the best situation would be to find a solution to nullify the harmful effects of the PCBs. If that is not interesting to EPA, then the dredge sediment should be shipped by rail to a Certified TSCA dump. Dredging and dumping the contaminants onto virgin ground is ludicrous. EPA states they need to get rid of PCBs right now after 40 years of GE dragging their feet with an unknown amount of money spent for lawyers and appeals until the Giant Corporate Spoiled Brats get their way to save money, by dumping hazardous waste in an unsuitable location, demonstrating total disregard for Berkshire residents, after they left the county. Using trucks for the transport of the materials into a dump, instead of rail out of state, is the least environmental protective measure one could take. In a more desirable world, research and testing studies by appropriate Universities and/or leading-edge scientific industries would be a better approach since PCBs are present worldwide.

I hope EPA will show more consideration for town and state regulations, in order to protect our citizens health, safety, and quality of life.

Sincerely,

Gail Ceresia
Professional Wetland Scientist, Registered Sanitarian

From: [Gary Mayne](#)
To: [R1Housatonic](#)
Cc: [Pignatelli, Smitty - Rep. \(HOU\)](#)
Subject: PCB Transportation Plan
Date: Monday, January 29, 2024 2:40:10 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 live in Lenox in between [REDACTED] and was alarmed reading the article in the 1/27/24 edition of the Berkshire Eagle regarding GE's transportation plan to move contaminated soil by truck to the Woods Hole Upland Disposal Facility and to out of state locations. Little did I realize when I purchased my home 7 years ago, I was moving into ground zero territory for PCB mitigation.

Doing the math, 32,000 truck loads over 13 years equates to 2,461 truck loads per year. And presumably, that is a one way trip requiring return trips back to the source. It is hard to measure the impacts to the area from the increase in traffic, noise, road wear and most of all, impacts to air quality from emissions and particulates spewed into the air from diesel exhaust. Health impacts from airborne diesel particulates include irritation to the eyes, throat and nose, heart and lung disease, and lung cancer.

Using rail would not eliminate all these impacts but would greatly reduce them. For example, according to the Association of American Railroads, railroad transport lowers greenhouse gas emissions by 75% when compared to truck transport.

I strongly urge the EPA to require GE to move contaminated soil by train, not by truck. GE should be required to use the solutions with the fewest impacts to the community and not solutions that favor GE's bottom line.

Sincerely,

Gary W Mayne

[REDACTED]
Lenox, MA [REDACTED]

From: [Holly Hardman](#)
To: [R1Housatonic](#)
Subject: On-Site and Off-Site Transportation and Disposal Plan, GE Housatonic River PCB Cleanup
Date: Tuesday, January 30, 2024 2:55:45 PM

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

January 30, 2024

Revision to mistyped acronym in my letter submitted on January 27, 2024. I mistakenly typed FDA, not EPA in the last paragraph. This has been corrected.

RE: On-Site and Off-Site Transportation and Disposal Plan

GE Housatonic River PCB Cleanup

Dear David Cash
Bryan Olson
Karen McGuire
Lynne Hamjian
James Chow
Elizabeth Deabay
Nancy Barmakian
Arthur Johnson
Carl Dierker
Ken Moraff

And EPA Region 1 Staff who are considering comments from Housatonic River and Region and Southern Berkshire County Region Stakeholders

I apologize for submitting my statement so close to the Feb. 1 deadline.

I have been following news and public conversation about the plans for the UDF in Lee, MA, and have appealed to the Great Barrington Select Board, asking members to add the topic of the proposed UDF to regular town meeting agendas. So far, they have refused. I think this will change as more details about the transport plan come to light. I will state the reasons I think this is the case.

Please read an excerpt from a letter dated May 9, 2018 to Dean Tglierro of the EPA from the Berkshire Regional Planning Commission. Note: I have put some of the text in bold type.

The Berkshire Regional Planning Commission has been working with the "Rest of River" towns to develop local information **supporting EPA's position requiring out-of-state disposal of the PCB contaminated material** to be removed from the Housatonic River site...

GE has proposed three possible landfill sites, two in the Town of Lee (Woods Pond/Lane Construction and Forest Street) and one in the Town of Great Barrington (Rising Pond). **All three sites are contrary to long-standing adopted community plans and local zoning and all three have major environmental constraints which would preclude their use as landfill sites, hazardous or otherwise.** We offer the following information to assist EPA Region 1 in following up on the Environmental Appeals Board (EAB) suggestion for "Further record development . . . on the potential impacts of a spill on environmental resources, business, and residences near the on-site disposal locations" (EAB Order, January 26, 2018, p. 136).

All three sites still play a role in the current remediation plan, even though the people of the Rest of River towns objected to all of them. What changed? I realize that the Rest of River Committee was coerced into accepting a plan that went against the will of the people, but that's for another time.

In this correspondence, I am focusing on GE's offer to use trucks to transport PCBs from the Housatonic River to the UDF in Lee via backroads and through the center of Lenox and perhaps the center of

Stockbridge.

Our ROR towns are expected to accept thirteen years of trucks navigating curvy backroads of various elevations with varying, sometimes dangerous, weather conditions. And these trucks will have beds laden with PCBs using unproven methods and materials to secure them. One of the greatest unknowns in the transport equation will be the incidence of vehicular accidents along the identified roads over the 13-year period. The law of averages demands that this be factored into the multi-year, multi-vehicle transportation equation that is full of unknowns. The estimated 32,000 trips guarantee that there will be accidents. And none of them will be incidental when (not if) PCBs are spilled into our rural landscape or in one of the ROR town residential or business areas. This prospect has not been properly contemplated.

Please consider: Not only are reported vehicular accidents common on the proposed roadways, but there are additional accident numbers that remain unreported, usually to avoid a rise in insurance premiums. All PCB-laden truck accidents would be consequential -- whether another vehicle hits one of the trucks, or one of the truck drivers loses control on an icy road, or if a PCB truck driver swerves to avoid hitting a deer, a child, or another vehicle. There are all sorts of worrisome scenarios. The long-term damage from PCB spillage would be considerable, probably disastrous. The law of averages is not on the side of GE's misthought-out trucking plan.

Even a layperson like me knows that PCBs pose a danger to human health and poison the natural environment they come into contact with, as they have already done to the avian, amphibian, and aquatic life of the Housatonic. We know that in humans PCBs cause liver and biliary cancer, serious gastrointestinal issues, and rashes that can indicate or lead to internal toxicity.

It seems wiser, from what I have learned, to explore train transport as an option. It seems that GE has failed to do so. GE has been using a lack of railroad sidings as an excuse not to use train transport. So, build them, GE. And, from what I understand, GE has made no proper effort to communicate with the railroad company that owns or operates rail transport in the region.

My understanding is that GE does not want to spend the funds for an acceptable plan. But this is not an acceptable excuse — not for any party involved in the decision-making process.

I would like to make one more point. The plan states: that "the design work plans for downstream RUs will be developed and submitted to EPA in an iterative manner in subsequent years." Am I to understand that the plans for the downstream PCBs have not been developed yet? That seems foolhardy and irresponsible.

As an agency, you at the EPA have a responsibility to the public and to yourselves. You are tasked with protecting the environment and restricting GE to a remediation plan that safeguards the region, one that does not pose further or new risk to the people and the entire Housatonic River ecosystem.

Best regards,

Holly Hardman

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Holly Hardman

Great Barrington, MA

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From: [Holly Hardman](#)
To: [R1Housatonic](#)
Subject: RE: On-Site and Off-Site Transportation and Disposal Plan/Housatonic River
Date: Saturday, January 27, 2024 10:06:38 PM

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

January 27, 2024

RE: On-Site and Off-Site Transportation and Disposal Plan
GE Housatonic River PCB Cleanup

Dear David Cash
Bryan Olson
Karen McGuire
Lynne Hamjian
James Chow
Elizabeth Deabay
Nancy Barmakian
Arthur Johnson
Carl Dierker
Ken Moraff

And EPA Region 1 Staff who are considering comments from Housatonic River and Region and Southern Berkshire County Region Stakeholders

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In this correspondence, I am focusing on GE's offer to use trucks to transport PCBs from the Housatonic River to the UDF in Lee via backroads and through the center of Lenox and perhaps the center of Stockbridge.

Our ROR towns are expected to accept thirteen years of trucks navigating curvy backroads of various elevations with varying, sometimes dangerous, weather conditions. And these trucks will have beds laden with PCBs using unproven methods and materials to secure them. One of the greatest unknowns in the transport equation will be the incidence of vehicular accidents along the identified roads over the 13-year period. The law of averages demands that this be factored into the multi-year, multi-vehicle transportation equation that is full of unknowns. The estimated 32,000 trips guarantee that there will be accidents. And none of them will be incidental when (not if) PCBs are spilled into our rural landscape or in one of the ROR town residential or business areas. This prospect has not been properly contemplated.

Please consider: Not only are reported vehicular accidents common on the proposed roadways, but there are additional accident numbers that remain unreported, usually to avoid a rise in insurance premiums. All PCB-laden truck accidents would be consequential -- whether another vehicle hits one of the trucks, or one of the truck drivers loses control on an icy road, or if a PCB truck driver swerves to avoid hitting a deer, a child, or another vehicle. There are all sorts of worrisome scenarios. The long-term damage from PCB spillage would be considerable, probably disastrous. The law of averages is not on the side of GE's mighthought-out trucking plan.

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My understanding is that GE does not want to spend the funds for an acceptable plan. But this is not an acceptable excuse — not for any party involved in the decision-making process.

I would like to make one more point. The plan states: that "the design work plans for downstream RUs will be developed and submitted to EPA in an iterative manner in subsequent years." Am I to understand that the plans for the downstream PCBs have not been developed yet? That seems foolhardy and irresponsible.

As an agency, you at the FDA have a responsibility to the public and to yourselves. You are tasked with protecting the environment and restricting GE to a remediation plan that safeguards the region, one that does not pose further or new risk to the people and the entire Housatonic River ecosystem.

Best regards,
Holly Hardman

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Holly Hardman

[REDACTED]
Great Barrington, MA [REDACTED]
[REDACTED]

From: [Jay Kistler](#)
To: [R1Housatonic](#); [Tagliaferro, Dean](#)
Subject: Re: Transportation Plan
Date: Saturday, January 27, 2024 3:13:20 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,

We are full-time residents of Lenox, with a home in the center of town. We wish to add our voices to the many others in the community that are calling for rail transport and hydraulic dredging instead of truck hauls for removal of most contaminated material from the Housatonic. The benefits to Lenox and the other RoR communities of this approach are numerous and well-documented: safer streets and highways, less damage to the road infrastructure, less risk from spills, less air circulation of contaminated material, etc. Moreover, much of the necessary rail infrastructure is already in place. GE's plan was clearly driven by only one factor -- minimizing the hit to their bottom line. We urge the EPA to send them back to the drawing board and force them to consider the costs and benefits to the communities, not GE's shareholders.

Respectfully,

James Kistler and Christine Conklin
Lenox, MA

From: [REDACTED]
To: [R1Housatonic](#)
Subject: Input on Off-site and On-site Transportation and Disposal Plan
Date: Thursday, December 28, 2023 1:56:18 PM

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

December 28, 2023

To Whom It May Concern at the EPA,

We are writing to officially go on record as being opposed to General Electric's November 1, 2023 proposal to use dump trucks as its primary solution for transporting PCB laden sediment from the Housatonic River.

We agree with the multi-town leadership collective, which includes the Town of Lee, that the option of using rail transport has not been adequately explored as a more viable alternative that could lessen environmental and health impacts. The 13 year plan to convey toxic material through neighborhoods, commercial centers, near playgrounds, schools, farm fields, etc., is unacceptable when railway options could be made feasible.

The great cost to Berkshire County communities from General Electric's decision to dump PCB's in the Housatonic River should not be compounded any more than absolutely necessary with attempts to clean up some of the devastation. If the disregard of the rail option is to basically save cost to General Electric, then the Transportation and Disposal Plan is a travesty. Ultimately, caring for the health and well being of our communities is right and beneficial for everyone, GE included, and will be cost effective in the long run for all concerned.

Sincerely,

James M. Schwarz, Ed.D.
Christine Schwarz, R.N.

From: [Jane LePrevost](#)
To: [R1Housatonic](#)
Subject: Dump in Lee
Date: Tuesday, December 12, 2023 9:07:53 PM

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

From the original decision to locate the dump

In Lee to the present time I continue to be strongly opposed to the placement of the dump and the transportation via multiple truckloads over many years through my town.

Please listen to our townspeople and do the right thing which is not placing the dump in Lee. I am against the proposed plan. Jane LePrevost

Sent from my iPhone

From: [Janice Braim](#)
To: [R1Housatonic](#)
Subject: No dump No trucks
Date: Wednesday, January 31, 2024 11:12:54 PM

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

Sent from my iPhone

You guys need to step up to the plate and do the right thing. PCBs will go airborne. You need to push GE to try other ways to clean up the River! There's so many people that have passed away because of GE and their PCB's! You cannot tell me that the dump will not leak at some point! You are going to lower our property values and 13 years of trucks going through our towns, you gotta be out of your mind! Step up the plate and make GE do the right thing. It's all about money and they have money! They did this to us now it's time for us to fix what they did and fight for our lives! This is totally unacceptable!

Janice Braim

[REDACTED]
Lee, Ma [REDACTED]

From: [Jared Weber](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollection@gmail.com
Subject: Jared Weber Public Comment on Rest of River General Electric T&D Plan
Date: Sunday, January 21, 2024 1:03:32 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 am Jared Weber, a full-time resident of Lenox, Massachusetts. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed “Rest of River” Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the “Rest of River” clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE’s 13-year “Rest of River” clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

- The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.
- The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

- Greenhouse emissions (drastically reduced with rail)
- Noise pollution (drastically increased with use of trucks)
- Safety, including the risk of pedestrian accidents (rail is much safer)
- Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure
- A real feasibility study on the use of rail, which takes into account all of the relevant details, including that:
 - very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks
 - the argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

I trust that you will advocate on behalf of the environment and constituents you represent while you regulate this cleanup.

Sincerely,

Jared Weber

[REDACTED]

Lenox, MA

--

Jared Weber

[REDACTED]

From: [Jean Louis](#)
To: [R1Housatonic](#)
Subject: Housatonic River Clean-Up Concern
Date: Sunday, January 28, 2024 12:26:49 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 own a condo upriver on [REDACTED] one mile from the Rising Pond area. Because of the curve in the river, the Rising Pond area is a lot closer, and sound travels and echos easily in this area. I am concerned about the disturbance, the sound of the work as well as the danger of trucks on the road carrying contaminants. Southern Berkshire County depends on tourism and I worry about the disruption to the quality of life here.

I would prefer the river be left until humans find a better solution to dealing with PCBs than dredging. People are boating in the river, wildlife has come back. Why cause a disturbance, it's been 50 years.

Please refer to this article from the National Ocean Service.
<https://oceanservice.noaa.gov/facts/pcbs.html#:~:text=Typically%2C%20PCBs%20are%20either%20broken,found%20in%20soil%20or%20sediments.>

"Typically, PCBs are either broken down in the environment by sunlight or by microorganisms. Sunlight plays an important role in the breakdown of PCBs when they are in the air, shallow water, or surface soils. Microorganisms, such as bacteria, algae, or fungi, biodegrade PCBs when found in soil or sediments."

Thank You,
Jean

Jean Louis

[REDACTED]
Great Barrington, MA [REDACTED]
[REDACTED]

From: [Jean Louis](#)
To: [R1Housatonic](#)
Subject: Leave the River Alone
Date: Thursday, January 18, 2024 11:07:33 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 own a home a mile down the road from Rising Pond Dam and think that you should leave the river alone.

Wildlife has come back and we don't need a big mess and disturbance here. Mother nature will take care of everything in time.

Please leave the river alone.

Thank you,

Jean Louis

Great Barrington, MA

From: [Jeanne Schnackenberg](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com
Subject: River Clean Up
Date: Tuesday, January 30, 2024 7:57:32 PM
Attachments: [Doc1.docx](#)

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

Dear Mr. Dean Tagliaferro,

I am Jeanne Schnackenberg. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed “Rest of River” Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the “Rest of River” clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE’s 13-year “Rest of River” clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

- The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.
- The exclusion from the T&D Plan of fundamentally

relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

- Greenhouse emissions (drastically reduced with rail)
- Noise pollution (drastically increased with use of trucks)
- Safety, including the risk of pedestrian accidents (rail is much safer)
- Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure
- A real feasibility study on the use of rail, which takes

into account all of the relevant details, including that:

- very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks
- the argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

The impact of 40,000+ trucks transporting PCBs will negatively affect not only the psychological impact to our local families within the Berkshire Communities but also the economic impact on all of us and the businesses that rely on tourism. Many of our roads are already suffering with endless potholes to dodge and too many bridges need to be fixed

Sincerely,

Jeanne Schnackenberg, Board Member of the Lenox Land Trust

[REDACTED]

[REDACTED], Pittsfield, MA [REDACTED]

From: [Jeff Vincent](#)
To: [R1Housatonic](#)
Subject: GE-Pittsfield/Housatonic River Site Rest of River (GECD850)
Date: Friday, January 19, 2024 1:38:11 PM

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

Re: OBJECTION TO
GE-Pittsfield/Housatonic River Site
Rest of River (GECD850)
On-Site and Off-Site Transportation and Disposal Plan

To Whom It May Concern:

It is inconceivable to us that the transportation plan for the disposal of PCBs concentrated in the Housatonic River would be to truck them through residential neighborhoods. One of those neighborhoods is ours. Trucks would pass through the center of our town of Lenox/Lenox Dale and within 150 feet of our home. We strongly advocate for a much higher percentage of transportation by a means that minimizes proximity to residential areas than does the proposed method of trucking. Rail is currently in close proximity to the river and could provide a much safer transportation option. Our neighborhoods should not be put at risk of contamination by a truck carrying PCB laden material being involved in an accident. It makes no sense to risk potentially contaminating additional areas when the mandate of "The Plan" is to reduce contamination.

We are strongly opposed to the trucking plan proposed by GE because of the prolonged and increased disturbance to communities already injured by PCBs; the inefficiency of the method; the likelihood of spreading this contaminant throughout the entirety of communities who continue to bear the brunt of the harm of this toxic material. We strongly support a rail transportation option for any movement of PCBs and the avoidance of trucking through residential areas.

Respectfully,
Jeff and Sally Vincent

██████████
Lenox, MA ██████████

From: [REDACTED]
To: R1Housatonic
Subject: U.S. EPA-Housatonic@epa.gov
Date: Wednesday, January 31, 2024 12:45:13 PM

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

To begin it is evident that the mediation from the beginning was structured to keep the average citizen in the dark regarding the Proposed PCB dump in Lee and a hasty decision. Just plunk the dump down in the middle of a community where people live and a toxic dump right next to the river and contaminate another area? It appears that the EPA sides with industry over public health.

The history is obvious back to GE's 1972 agreement not to sue Monsanto for claims arising from the environmental health harm caused by the chemical it used in building power transformers and dumped into the Housatonic. Clearly GE mislead workers, customers, regulators and the public for decades.

PCB's have and continue to cause serious health problems. Now the proposed Upland Disposal Facility will jeopardize the ecological balance and health of our community.

The amount of compensation in the agreement is an insult. The homeowners property values and health hazards were not considered. There is adequate research documenting the failure rate of liners.

The argument that exploring safer and more sustainable methods won't work or are too expensive is outrageous! GE made this mess, makes a ton of money (is one of the richest companies in the world) and should be held responsible for a remedy.

Obviously I am opposed to dredging as it is an antiquated method.

There is so much more information and research needed! Rail transportation could be an option but still doesn't address the problem.

Cleaning up 30% of the PCB's accomplishes what? The river will still be contaminated. The DPH warns against eating fish, frogs, turtles and ducks from the river. Did dredging the Hudson River which continues to be contaminated and PCB levels not reduced after more than 10 years work?

Lee the gateway to the Beautiful Berkshires and home of the Upland Disposal Facility ! This is devastating to the entire Berkshire County!

Politics are driving this position! Clearly there have been bad policy choices.

I used to believe the EPA stood to safeguard our environment, now I believe they are only representing the interest of GE.

Best case scenario in my opinion would be to leave the river alone until more studies and research can be done. I see no logic in the decision to dredge and move this contaminated material to another area just above a vital aquifer.

The EPA needs to safeguard our environment and our community.

A very concerned citizen of Lee, MA

Joanne Simpson

[REDACTED]

Lee, MA [REDACTED]

From: [John McElwain](#)
To: [R1Housatonic](#)
Subject: Public Comment on Rest of River General Electric T&D Plan
Date: Sunday, January 28, 2024 1:00:33 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 am, John McElwain [REDACTED] Washington, MA [REDACTED]. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed "Rest of River" Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the publicM comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the "Rest of River" clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE's 13-year "Rest of River" clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.

The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

1. Greenhouse emissions (drastically reduced with rail)
2. Noise pollution (drastically increased with use of trucks)
3. Safety, including the risk of pedestrian accidents (rail is much safer)

4. Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure
5. A real look at what staging infrastructure and property access rights will be required, which are likely to be very similar regardless of use of rail vs trucks

The argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams.

There are also many benefits to the use of rail that are not considered, including the fact that with use of rail, remediation can begin before the dump is constructed; and the positive implications that come with long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

Thank you for your time and consideration.

Sent from my iPhone

From: [Joni Olsen](#)
To: [R1Housatonic](#)
Subject: Toxic PCB Issues
Date: Wednesday, January 31, 2024 9:40:23 PM

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

Hello,

As a longtime Lenox resident, currently residing on [REDACTED] for the past 25 years, I'm extremely concerned and frightened for my family and our health and safety. My wish is to leave it all alone. The dredging is making more of a mess, and they're only going to get about 30% of the toxic sediment out.(based on the Hudson River and others).

I will cut to the chase: I'm demanding that GE and the EPA build the railroad siding to minimize the truck usage. They have the funding and can do it, make them. Period.

Air quality studies must be done. The Berkshires are one of the most beautiful and pristine locations in the world and the dredging is going to release the TOXIC PCB particles into our air and our homes and gardens and actually spread them far past the sediment in the river.

Roaring Brook Road is obviously a much better route than East Street. Thank you.

The trucks, oh the trucks. Tonka trucks with tarps!!! We were told at the meeting in Lee right before covid, that the trucks were to be sealed. Page 41 section 5 says that the DUMP TRUCK can carry 16 tons, with a polyethylene sheeting lining the bed. THIS IS NOT A SEALED TRUCK. PICTURE A MILK OR GAS TRUCK- COMPLETELY SEALED, NO LEAKS! Anything short of that is dangerous, pointless and frankly, RECKLESS.

Demand sealed trucks.

Thank you for your time,
Joni

From: [Joyce Peirce](#)
To: [R1Housatonic](#)
Subject: waste disposal
Date: Saturday, January 6, 2024 1:35:58 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 writing to give my input about the transport of PCB waste in Berkshire County. Please require the transport to occur via secure trains rather than trucks. In my opinion this is better for our communities. Thank you.
Joyce S Peirce

--
Joyce Peirce, MELT Instructor

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Shop the MELT Method store](#)

From: [Jules Ardouin](#)
To: [R1Housatonic](#)
Subject: Public Comment on Rest of River General Electric T&D Plan
Date: Wednesday, January 31, 2024 4:33:45 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 am [Julien Arsouin, ██████████, LenoxMa]. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed “Rest of River” Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the “Rest of River” clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE’s 13-year “Rest of River” clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.

The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

To expand on the above, a revised Transportation & Disposal Plan should include an honest

and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

1. Greenhouse emissions (drastically reduced with rail)
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3. Safety, including the risk of pedestrian accidents (rail is much safer)
4. Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure
5. A real look at what staging infrastructure and property access rights will be required, which are likely to be very similar regardless of use of rail vs trucks

The argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams.

There are also many benefits to the use of rail that are not considered, including the fact that with use of rail, remediation can begin before the dump is constructed; and the positive implications that come with long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

Thank you for your time and consideration.

From: [Tooley June Sprigg](#)
To: [R1Housatonic](#)
Cc: [Laurie Kropkowski](#)
Subject: Lee Toxic Dump
Date: Tuesday, January 2, 2024 2:54:42 PM

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

I won't bore you with discussing the current arguments for using the rails instead of thousands of trucks to dump GE's Housatonic River PCBs in the proposed Toxic Dump facility in Lee. Instead, I want to ask WHY the EPA would allow any company, particularly one whose ethical and moral codes are, and have been, questionable, to decide WHERE and HOW to dispose of this toxic "Forever Chemical". I don't understand the logic of moving these highly dangerous poisons from one place in the county to another. Not only doesn't this make sense, but now you're allowing GE to contaminate another area.

Mickey Friedman, a regular contributor to the Berkshire Edge regarding the PCB project, recently wrote a three part series titled "THE OTHER SIDE: Sue Monsanto, save Lee — a modest proposal", and in Part two he poses what I think is the cornerstone question about this entire project: "How much PCB contamination will be left in the river sediments and bank soils? And what about the massive amounts that will be transferred from one part of our environment to another, to a lined dump the authorities swear will be safe from the likely increasing threats of the climate crisis?" Additionally, the plan calls for removing merely 30% of the PCBs in the river, which leaves it still - polluted with PCBs. Where is the logic in that decision? Either remove them all - and there are newer technologies that make that possible - or do nothing. Doing nothing is a much more sane and logical approach than moving a portion of poison from the river, and transporting it to another area just above a vital aquifer.

The movement of these dangerous toxins from a contaminated zone to a pristine natural area poses an inherent risk of jeopardizing the ecological balance and the health of our community, and not to mention the economic damage to the county. Such an action could potentially lead to the contamination of previously unaffected ecosystems, putting wildlife, flora, and especially our water sources at grave risk.

The history of PCBs isn't a pretty one. Timelines show that manufacturers and users of PCBs knew by the 1930's and 1940's that PCBs caused serious health problems. Advice from physicians about the consequentially deadly effects had no bearing on these industries to stop producing and using PCBs, or from releasing PCBs into our environment contaminating our waterways, air and wildlife. It appears from the history of PCBs that several of these companies (including GE) deliberately mislead workers, customers, regulators, and the public for decades. Even though GE had clear knowledge since the 1960's that PCBs are very harmful to humans and wildlife, they did nothing. On 22 April 1998 (after PCBs were finally banned) GE CEO Jack Welch still claimed: "PCBs do not pose adverse health risks". And you want to allow these people to control the clean-up?

I implore the EPA to prioritize the protection of our Beautiful Berkshires, the health of the community, and that of future generations by rejecting General Electric's plan to dump PCBs in Lee, Massachusetts. Instead, I urge the EPA to explore safer and more sustainable alternatives for the removal, and disposal of these hazardous substances. As your website says about your Best Management Practices: "the selection (site) considerations will include community concerns". I know that the county residents have loudly expressed their concerns!

Thank you for considering my concerns. I hope the EPA will stand firm in safeguarding our environment and community by denying this detrimental project.

Sincerely,

June Tooley

From: [Kaden Kelly](#)
To: [R1Housatonic](#)
Subject: Public Comment on Rest of River General Electric T&D Plan
Date: Wednesday, January 31, 2024 3:49:59 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 am [Kaden Kelly, ██████████, Lee MA]. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed “Rest of River” Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the “Rest of River” clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE’s 13-year “Rest of River” clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

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The argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams.

There are also many benefits to the use of rail that are not considered, including the fact that with use of rail, remediation can begin before the dump is constructed; and the positive implications that come with long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

Thank you for your time and consideration.

From: [Keely Schoeny](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com
Subject: RE: Keely Flynn Schoeny's Public Comment on Rest of River General Electric T&D Plan
Date: Wednesday, December 27, 2023 9:09:39 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,

My name is Keely Flynn Schoeny- I'm a parent, resident of Pittsfield, and I work in many of our county's communities. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed "Rest of River" Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

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of transportation can be made.

-The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

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- A real feasibility study on the use of rail, which takes into account all of the relevant details, including that:
 - very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks

-the argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

On a personal note, I grew up in Pittsfield in the '80s and have firsthand knowledge of what the many rounds of cleanup looked like and felt like, and I want much better for my family.

Sincerely,

Keely Flynn Schoeny, Berkshires resident and Mom of 3

From: [kelly godwin](#)
To: [R1Housatonic](#)
Subject: Trains
Date: Thursday, February 1, 2024 10:04:27 AM

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

It's been decades at this point. Let's just get the stuff out of here already and use trains. We have suffered enough. This is our east Palestine. There shouldn't even be a dump here in the first place but if this is what a compromise looks like where the dump can malfunction or shift at any time and put us back to square 1 let's at least get the higher concentrations of PCBs out of here quickly.

From: [Kim Graham](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com
Subject: Public Comment Rest of River Cleanup
Date: Tuesday, January 30, 2024 12:53:33 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 am Kim Graham, With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed “Rest of River” Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the “Rest of River” clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE’s 13-year “Rest of River” clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.

The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public

understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

Greenhouse emissions (drastically reduced with rail)

Noise pollution (drastically increased with use of trucks)

Safety, including the risk of pedestrian accidents (rail is much safer)

Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure

A real feasibility study on the use of rail, which takes into account all of the relevant details, including that:

very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks

the argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate.

Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

-Kim Graham Lenox Dale Ma

Sent from my iPhone

From: [Laurie Kropkowski](#)
To: [R1Housatonic](#)
Subject: Dumping PCBs in Lee, MA
Date: Thursday, January 4, 2024 9:00:06 AM

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

I won't bore you with discussing the current arguments for using the rails instead of thousands of trucks to dump GE's Housatonic River PCBs in the proposed Toxic Dump facility in Lee. Instead, I want to ask WHY the EPA would allow any company, particularly one whose ethical and moral codes are, and have been, questionable, to decide WHERE and HOW to dispose of this toxic "Forever Chemical". I don't understand the logic of moving these highly dangerous poisons from one place in the county to another. Not only doesn't this make sense, but now you're allowing GE to contaminate another area.

Mickey Friedman, a regular contributor to the Berkshire Edge regarding the PCB project, recently wrote a three part series titled "THE OTHER SIDE: Sue Monsanto, save Lee — a modest proposal", and in Part two he poses what I think is the cornerstone question about this entire project: "How much PCB contamination will be left in the river sediments and bank soils? And what about the massive amounts that will be transferred from one part of our environment to another, to a lined dump the authorities swear will be safe from the likely increasing threats of the climate crisis?" Additionally, the plan calls for removing merely 30% of the PCBs in the river, which leaves it still - polluted with PCBs. Where is the logic in that decision? Either remove them all - and there are newer technologies that make that possible - or do nothing. Doing nothing is a much more sane and logical approach than moving a portion of poison from the river, and transporting it to another area just above a vital aquifer.

The movement of these dangerous toxins from a contaminated zone to a pristine natural area poses an inherent risk of jeopardizing the ecological balance and the health of our community, and not to mention the economic damage to the county. Such an action could potentially lead to the contamination of previously unaffected ecosystems, putting wildlife, flora, and especially our water sources at grave risk.

The history of PCBs isn't a pretty one. Timelines show that manufacturers and users of PCBs knew by the 1930's and 1940's that PCBs caused serious health problems. Advice from physicians about the consequentially deadly effects had no bearing on these industries to stop producing and using PCBs, or from releasing PCBs into our environment contaminating our waterways, air and wildlife. It appears from the history of PCBs that several of these companies (including GE) deliberately mislead workers, customers, regulators, and the public for decades. Even though GE had clear knowledge since the 1960's that PCBs are very harmful to humans and wildlife, they did nothing. On 22 April 1998 (after PCBs were finally banned) GE CEO Jack Welch still claimed: "PCBs do not pose adverse health risks". And you want to allow these people to control the clean-up?

I implore the EPA to prioritize the protection of our Beautiful Berkshires, the health of the community, and that of future generations by rejecting General Electric's plan to dump PCBs in Lee, Massachusetts. Instead, I urge the EPA to explore safer and more sustainable alternatives for the removal, and disposal of these hazardous substances. As your website says about your Best Management Practices: "the selection (site) considerations will include community concerns". I know that the county residents have loudly expressed their concerns!

Thank you for considering my concerns.

Sincerely,

Laurie Kropkowski | [REDACTED], Lee, MA [REDACTED]

[Laurie Kropkowski](#)

Senior Documentation/Training Consultant



Lee, Massachusetts

From: [LISA KANE](#)
To: [R1Housatonic](#)
Subject: Public Comment on Rest of River General Electric T&D Plan
Date: Tuesday, January 30, 2024 10:49:37 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 am Lisa Kane [REDACTED] t Lenox Ma, . With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed “Rest of River” Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the “Rest of River” clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE’s 13-year “Rest of River” clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.

The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

1. Greenhouse emissions (drastically reduced with rail)
2. Noise pollution (drastically increased with use of trucks)
3. Safety, including the risk of pedestrian accidents (rail is much safer)

4. Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure
5. A real look at what staging infrastructure and property access rights will be required, which are likely to be very similar regardless of use of rail vs trucks

The argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams.

There are also many benefits to the use of rail that are not considered, including the fact that with use of rail, remediation can begin before the dump is constructed; and the positive implications that come with long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

Thank you for your time and consideration.

Sent from my iPhone

From: [Lisa Nelson](#)
To: [R1Housatonic](#)
Subject: train transport, not trucks
Date: Monday, January 8, 2024 9:27:38 AM

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

Hello,

I recently learned that rail transportation is an alternative to trucking to remove debris from the PCB clean up. Our community has already suffered enough. Having lots of unnecessary truck traffic when trains are an option is undesirable, and we should not have to endure this. GE needs to pay whatever extra is needed to pursue rail transport.

Thanks you,

Lisa Nelson
Lenox, MA

From: [lucinda.hastings](#)
To: [R1Housatonic](#)
Subject: NO to trucking waste from Housatonic River
Date: Wednesday, January 31, 2024 9:51:09 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:

Years of trucks going through our villages will ruin the quality of life here. It is sickening that GE/Monsanto is able to get away with the least expensive option After polluting the beautiful Housatonic River for so many years. Given that it appears that you have not backed the option which which would be better for our community and have let GE get off with the cheaper option, better for them, worse for us, I hope you'll at least, at the very least, do your job of protecting the environment for the wildlife and people who live here by not further degrading life around here by having years of heavy trucks roll through our villages. Rail is the lesser of two evils.

Lucinda Hastings

[REDACTED]
Housatonic, Massachusetts [REDACTED]

Sent from my iPhone

From: [Marcia Slaminsky](#)
To: [R1Housatonic](#)
Subject: Letter to EPA...
Date: Sunday, January 21, 2024 1:40:50 PM
Attachments: [Letter to EPA.pdf](#)

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

Dear Ashlin...I never received an acknowledgement of your receipt of my letter. Did you receive it? Here's another copy. I am tremendously upset (to say the least!) with the EPA's decision to allow GE to destroy our Beautiful Berkshires with a TOXIC WASTE DUMP!
Thank you, Marcia Slaminsky

Marcia Slaminsky

Lee, MA

11 January 2024

Environmental Protection Agency
Office of Regional Administrator
5 Post Office Square, Suite 100
Boston, MA 02109

Subject: Opposition to General Electric's Toxic PCB Dump in Lee, MA

I won't bore you with discussing the current arguments for using the rails instead of thousands of trucks to dump GE's Housatonic River PCBs in the proposed Toxic Dump facility in Lee. Instead, I want to ask WHY the EPA would allow any company, particularly one whose ethical and moral codes are, and have been, questionable, to decide WHERE and HOW to dispose of this toxic "Forever Chemical". I don't understand the logic of moving these highly dangerous poisons from one place in Berkshire County to another. Not only doesn't this make sense, but now you'll allow GE to contaminate another area.

The movement of these dangerous toxins from a contaminated zone to a pristine natural area poses an inherent risk of jeopardizing the ecological balance and the health of our community, and not to mention the economic damage to the county. Such an action could potentially lead to the contamination of previously unaffected ecosystems, putting wildlife, flora, and especially our water sources at grave risk.

Mickey Freidman, a contributor to the Berkshire Edge, (<https://theberkshireedge.com/the-other-side-in-the-land-of-the-davids/>) poses what should be the cornerstone question about this entire project: "How much PCB contamination will be left in the river sediments and bank soils? And what about the massive amounts that will be transferred from one part of our environment to another, to a lined dump the authorities swear will be safe from the likely increasing threats of the climate crisis?" The plan calls for removing only 30% of the PCBs in the Housatonic River. I do not understand this reasoning. Either remove them all - with the available new technologies - or do nothing.

As you're aware the history of PCBs isn't a pretty one. Timelines show that manufacturers and users of PCBs knew by the 1930's and 1940's that these chemicals caused serious health problems. Advice from physicians about the consequentially deadly effects had no bearing on these industries to stop producing and using PCBs, or from releasing them into our environment

contaminating our waterways, air, and wildlife. It appears from the history of PCBs that several of these companies (including GE) deliberately mislead workers, customers, regulators, and the public for decades. Even though GE had clear knowledge since the 1960's that PCBs are very harmful to humans and wildlife, they did nothing. On 22 April 1998 (after PCBs were finally banned) GE CEO Jack Welch still claimed: "PCBs do not pose adverse health risks". And you want to allow these people to control the clean-up?

So, I implore the EPA to prioritize the protection of our Beautiful Berkshires, the health of community, and that of future generations by rejecting General Electric's plan to dump PCBs in Lee, Massachusetts. Instead, I urge the EPA to explore safer and more sustainable alternatives for the removal, and disposal of these hazardous substances. As your website professes of your Best Management Practices: "the selection (site) considerations will include community concerns". I know that the county residents have loudly expressed their concerns...and animosity!

Thank you for considering my concerns. I hope the EPA will stand firm in safeguarding our environment and community by denying this detrimental project.

Marcia Slaminsky

From: [Marie Field](#)
To: [R1Housatonic](#)
Subject: Rest of the River Clean UP/ EPA Public Comment Opportunity
Date: Friday, January 26, 2024 4:03:43 PM

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

Dear Dean Taglioferro and team,

I had the opportunity to meet all of you at a Tri-Town Health meeting last November in Lee, MA. I could see that you were all decent human beings and not the Darth Vader brigade you were made out to be. I heard you loud and clear when you stated that if the involved towns put out a collective statement protesting GE's transportation plan that that would have greater influence than single protests here and there. We took that information to our Lenox Board of Selectmen and I believe we made a difference.

Here's what I want to say to all of you. When you close your eyes and imagine the Berkshires, what do you see? What do you feel? My guess is you see nature, majestic views, cultural centers, people practicing yoga and tourists strolling down the country mainstreets of Lee, Stockbridge and Lenox. What do you feel? My guess is you feel calm, tranquility, peace and the joy of clean mountain air filling your lungs. That vision is why people visit the Berkshires, move to the Berkshires or call the Berkshires home. That sense of peace and inner well-being is how all of us should enjoy life.

When you picture the Berkshires, you don't see toxic waste dumps at the base of our beautiful mountains. You picture wildlife and trees and sounds of the forest. When you picture the Berkshires, you don't expect to hear the high decibel roar of diesel powered dump trucks hauling toxic waste through our streets, by our schools, our churches and our quaint mainstreet shops. When you picture the Berkshires, you don't expect to smell the nostril irritating, throat inflaming diesel fumes from the multiple truckloads rolling by Tanglewood and Kripalu.

You get the picture. Why is it okay for the federal government to reward GE for their decades-long destruction of our beautiful rivers by allowing them to build toxic waste dumps and run toxic waste through our beautiful towns? Why is it okay?? To save them money? How can anyone with a conscience be okay with making us pay once again for the sins of General Electric? It's like beating up a victim of physical abuse to pay for the sins of the abuser! It's ludicrous and absurd.

I know you've heard all this before. Please, do the right thing. Make GE haul all that toxic waste out on RAIL to minimize the public exposure to airborne toxins, excessive noise, diesel fumes and constant dump truck traffic in heavy pedestrian tourist areas.

If GE can't do it, we the people are counting on our EPA to 'bring good things to light'!

Respectfully,
Marie T. Field

Lenox, MA [REDACTED]

From: [REDACTED]
To: R1Housatonic
Subject: Transportation and Disposal Plan - GE housatonic
Date: Tuesday, January 30, 2024 12:11:07 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 second home owner in Lee, MA. I have a condominium at [REDACTED]
[REDACTED] This is about 2 miles from the proposed PCB dump site.

As a non-all year round -resident of Lee and Massachusetts I have no vote on any issues or elections - despite paying property taxes all year round. It is the equivalent of taxation without representation - which is ironic for a state that threw tea in the harbor over taxes without representation.

Had I - and the many, many others in this group in the Berkshires, had any vote in this matter - or the election of those who did vote for it - I can assure you that there would be no PCB dump in Lee- or anywhere in the Berkshires.

Putting that aside, I am wondering if the same trucks that will carry high-level PCB soil out of state will be the same trucks that will carry low-level PCB soil to the dump. And if they will be the same fleet of trucks, what will be the procedure to clean the trucks from any high-level soil before it goes on to carry low-level PCB. And thereby making sure no high-level PCB soil makes it into the dump. What will be the process for cleaning these trucks between trips?

Additionally, along with others, I have big concerns about the use of Lee Main street to reach the turnpike with the high or low level soil. I would only be OK with that traffic if ALL the PCB soil was going to be removed from the Berkshires and NONE go into a dump. Perhaps rail would be better.

Two wrongs do not make a right and rights - GE destroyed the river in the past, and now will destroy our communities and streets with this plan to create a dump in the bucolic Berkshires. Take all the PCBs out of state. It is shameful that GE will ruin Lee and the Berkshires by putting a dump in Lee.

I doubt anything I would say here would change the plan, but the vote I do have is my pocketbook and I will never buy GE stock - or it's subsidiaries stock - and I will never buy any GE products.

Marjorie Reed

From: [Mark](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com
Subject: Mark Pignatelli: Public Comment on Rest of River General Electric T&D Plan
Date: Monday, January 22, 2024 8:57:55 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,

My name is Mark Pignatelli, a third generation resident while my two sons are the fourth generation born and raised in Lenox, Massachusetts. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed “Rest of River” Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the “Rest of River” clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE’s 13-year “Rest of River” clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

- The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.
- The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how

lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

- Greenhouse emissions (drastically reduced with rail)
- Noise pollution (drastically increased with use of trucks)
- Safety, including the risk of pedestrian accidents (rail is much safer)
- Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure
- A real feasibility study on the use of rail, which takes into account all of the relevant details, including that:
 - very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks
 - the argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

Sincerely,
Mark Pignatelli

From: [Mary Daire](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com
Subject: Mary Daire, Public Comment on Rest of River General Electric T&D Plan
Date: Wednesday, January 3, 2024 5:05:47 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,

My name is Mary Daire, I live on [REDACTED] in Pittsfield, Ma. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed "Rest of River" Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the "Rest of River" clean-up project. In alignment with formal comments submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE's 13-year "Rest of River" clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously

explored so that a truly informed decision about the method of transportation can be made.

The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

Greenhouse emissions (drastically reduced with rail)

Noise pollution (drastically increased with use of trucks)

Safety, including the risk of pedestrian accidents (rail is much safer)

Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure

A real feasibility study on the use of rail, which takes into account all of the relevant details, including that:

very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks

The argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays —and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

Please, do the right thing for the people and environment of Berkshire County!

Sincerely,

Mary Daire

██████████, Pittsfield MA ██████████

From: [Mary Daire](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com
Subject: "Rest of River" Transportation and Disposal Plan
Date: Thursday, January 18, 2024 6:31:54 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,

My name is Mary Daire, I live on [REDACTED] in Pittsfield, Ma. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the "Rest of River" clean-up project. In alignment with formal comments submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE's 13-year "Rest of River" clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously

explored so that a truly informed decision about the method of transportation can be made.

The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

Greenhouse emissions (drastically reduced with rail)

Noise pollution (drastically increased with use of trucks)

Safety, including the risk of pedestrian accidents (rail is much safer)

Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure

A real feasibility study on the use of rail, which takes into account all of the relevant details, including that:

very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks

The argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays —and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

Please, do the right thing for the people and environment of Berkshire County!

Sincerely,

Mary Daire

██████████, Pittsfield MA ██████████

Sent from my iPhone

From: [Mary Daire](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com
Subject: "Rest of River" Transportation and Disposal Plan
Date: Tuesday, January 30, 2024 7:02:32 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,

My name is Mary Daire, I live on [REDACTED] in Pittsfield, Ma. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the "Rest of River" clean-up project. In alignment with formal comments submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE's 13-year "Rest of River" clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.

The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been

submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

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lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

Please, do the right thing for the people and environment of Berkshire County!

Sincerely,

Mary Daire

██████████, Pittsfield MA ██████████

Sent from my iPhone

From: [Mary Daire](#)
To: [R1Housatonic](#)
Subject: GE PCB Transportation and Disposal Plan for Berkshire County, Massachusetts
Date: Monday, December 11, 2023 12:06:09 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,

GE is proposing a caravan of dump trucks carrying PCB-laden loads as their primary solution to cleaning up parts of the Housatonic River that they destroyed 50 years ago. The GE PCB Transportation and Disposal Plan in regards to the Rest of the River Cleanup was published for public viewing on November 1st, 2023. This proposal outlines a cleanup plan spanning 13 years, utilizing dump trucks as the primary form of transportation for PCB-laden sediment and soil that will be dredged from sections of the Housatonic River. Transportation of toxic waste on commuter roads, through neighborhoods and downtown commercial centers, on rural routes traversing farm fields where local produce is grown, in front of playgrounds and schools, is not acceptable.

Times have changed, truck transportation is the preferred method of transport of a bygone era.

We must not rely on the way things were done in the past, nor the mindsets of the past. We demand modern solutions in this modern world.

GE's mission statement reads: "**GE's focus on sustainability is to innovate technology to lift up the quality of life for people everywhere...**" GE's current plan is void of innovation and one that poses great environmental and health risks to Berkshire County. GE, put your engineers, your scientists, the brilliant minds that you employ to work on finding a modern solution to your problem that has been Berkshire County's problem for more than half a century. Utilize your resources to propose a safe, well-engineered cleanup plan that is on brand with the modern world.

GE **AND** the EPA, this is your chance to make things right. You destroyed our region once, we will not let it happen again.

Thank you,
Mary

From: [Mary Theresa Valleri](#)
To: [R1Housatonic](#)
Subject: Against GE's PCB Dump Proposal in Lee, Massachusetts
Date: Sunday, January 28, 2024 3:22:01 PM

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

January 28th, 2024

To Whom It May Concern,

Protecting the environment is a huge responsibility.

GE churning up toxic PCBs in the Housatonic River, allowing them to circulate in the air for people to inhale, is not protecting the environment! If this GE plan goes through, you are not doing the job of protecting people. You must know that dredging is an antiquated method, and not all the PCB's will be removed anyway, some just dumped a few yards from the river on a liner that will eventually leak.

Your attitude of "It's a done deal" shows clearly you are not acting as an environmental protection agency. I was glad to hear you are asking GE to reevaluate plans for soil transportation, but I wonder, where are your loyalties? If they are indeed for the environment which includes people, then stop this dredging and dump proposal NOW! BE RESPONSIBLE! Do your research and evaluate. Among the up-to-date studies about neutralizing PCBs is the use of microbes. Find and get a plan that is safe for the people of the Berkshires! If you don't, then because I live on a street that will be used by trucks hauling contaminated soil, the only decision for me to make is to move from my home of forty years! Do you really understand what impact you have! FIGHT THE GOOD FIGHT!!!! Be responsible!

Concerned Citizen of Lee, Massachusetts,
Marytheresa Valleri

[REDACTED]

Lee, MA [REDACTED]

From: [Michael Lucia](#)
To: [R1Housatonic](#)
Subject: Public Comment for Housatonic Rest of River Transportation: Urgent Concern Regarding Intersection Use in Lenox
Date: Wednesday, January 24, 2024 11:40:19 AM

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

Dear EPA Officials,

I am writing to you as a concerned resident of Lenox to express my strong reservations about the proposed or ongoing use of the intersection at Walker Street, West Street, Main Street, and Old Stockbridge Road for large truck transportation. This intersection, which predates the advent of motor vehicles, was originally designed for horse-drawn carriages and, as such, is ill-suited to accommodate modern, heavy vehicular traffic.

The infrastructure through historic Lenox has remained largely unchanged, and it is woefully inadequate to support the demands of large truck transportation. Using this intersection for such purposes poses significant safety risks to residents and visitors alike. The narrow and archaic design of the streets, combined with the increase in heavy traffic, could lead to dangerous situations, potentially causing accidents or harm to the community.

Moreover, the introduction of large trucks through this intersection would severely disrupt the traffic flow, exacerbating congestion in an area already challenged by its outdated design. The peaceful and historic nature of our town could also be compromised by the noise and pollution associated with heavy truck traffic.

In light of these concerns, I strongly urge the EPA to conduct a comprehensive safety study of this intersection before considering or continuing its use for large truck transportation. It is imperative that we understand the full extent of the risks involved and explore alternative routes that are better equipped to handle such traffic without compromising the safety and well-being of our community.

The historic charm and safety of Lenox are of paramount importance to its residents and visitors. I trust that the EPA will consider these factors with the seriousness they deserve and take appropriate action to safeguard our community.

Thank you for your attention to this matter. I look forward to your response and to seeing positive steps taken to address these concerns.

Sincerely,

Michael Lucia

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

██████████
Lenox, MA ██████████

January 29, 2024

Dean Tagliaferro
EPA Project Manager Housatonic Site
Boston, MA
Sent via email: Tagliaferro.Dean@epa.gov R1Housatonic@epa.gov

Re: Comments on the Housatonic Rest of River Transportation & Disposal Plan

Dear Mr. Tagliaferro,

As part of the consent decree signed by GE and the EPA (ROR), a Transportation and Disposal Plan (T&D) was submitted by Arcadis (October 2023) for public comment. In reviewing this document there are several deficiencies that I would like to bring to the attention of the EPA.

GE in their T&D, focus most specifically on procedures to be used for transportation and disposal of material from Reach 5A (pg. 2). The plan “considered several factors, including efficient modes of transportation and routes of travel, professional judgment, experience on other similar projects, and community input.”

Comment: Because this plan focuses on Reach 5A, no conclusions can be made as to final transportation methods for other reaches. Yet, GE makes proposals for all areas as far south as Reach 8. GE provides little accurate information for any significant planning until a SOW or POP for each Reach is published. This will likely be too late for community response.

GE has concluded that transportation by railroad from Reach 5A to the UDF is not practicable due to no current sidings at either the UDF or Reach 5A (pg. 17). In addition, existing railroad sidings area would require complete replacement of infrastructure and the ability to obtain access to privately owned sidings is uncertain.

Comment: GE has not attempted to contact the HRRC to determine if access would be granted! While GE states that infrastructure changes required for use of rail would take significant time, there is no comparison offered for the time it will take to build the UDF. Ge has publicly stated that the UDF build out is the rate limiting step in proceeding with River clean up.

On-site and off-site truck routes “have been located to prioritize major roads, avoid the designated restricted roads, and avoid other roads through developed areas to the extent practicable” (pg. 22).

Comment:

1.) If truck transport is selected over rail transport, especially in Reach 5A, dump trucks will travel through residential areas (Holmes Rd.)

2.) Trucks traveling from Reaches 7-8 to the UDF will pass through the center of Lenox, travel on Rt. 183 adjacent to an elementary school, and pass by major tourism site (Tanglewood) that can attract 16,000 people for a single event.

3.) GE has not fully examined the geographic, economic, and cultural impact of proposed truck routes. Rather it assumes the use of dump truck ss expedient because they can be used in large numbers without significant forward planning (property access, liability coverage).

The T&D Plan states that “hydraulic transport is not considered feasible for sediments from Reaches 5A, 5B, 7, or 8 (pg. 11).

Comment: No explanation is given as to why hydraulic options are not feasible. For example, if the distance from the RU to the UDF is the issue then why not use hydraulic conveyance to a railroad staging area.

General comments about the T&D Plan.

- 1) *The T&D has been released for public comment before Reach specific work plans (other than Reach 5A) are available. Therefore, GE is not obliged to follow any of the details listed in the T&D for the remainder of the Rus.*
- 2) *There is no mention in the T&D of expected traffic due to trucks returning to the work sites (now empty), carrying supplies to the work site, idling/parking near a work site and most importantly, transporting clean fill for Reach remediation. This last point has never been addressed by GE. It is unknown how much fill and how many loads will be transported to each Reach.*
- 3) *No cost benefit analysis has been presented by GE to analyze the impact of truck vs railroad vs hydraulic conveyance of contaminated soil from a RU and staging areas to either the UDF or an off-site facility. GE's preference for trucks is based on past work at other toxic waste remediation sites. The proximity of an active rail line so close to the Housatonic River is a unique opportunity that should not be lost. It can more efficiently transport waste to both off and on site containment areas.*

Overall, I would ask that the EPA require that GE revise the T&A to accurately assess the use of rail as the best option for transporting contaminated soil from the River to a containment facility. Although the impact of the cleanup on the local residents is not addressed in the T&D but rather in the Quality of Life Compliance Plan (Arcadis, December 2023), it is important to recognize that truck transport will contribute to significant environmental and noise pollution, safety issues and exposure to PCBs. Rail transport can mitigate many of these issues.

I would like to thank the EPA for allowing me the opportunity to submit my comments for further consideration.

Your sincerely,



Michael Nancollas

Cc: (via electronic mail)

Christopher Ketchen, Manager Town of Lenox
Sen. Edward Markey
Sen. Elizabeth Warren
Rep. Richard Neal
Sen. Paul Mark
Rep. Smitty Pignatelli

From: [Michelle Young](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com
Subject: Protest against Rest of River Disposal Plan
Date: Saturday, January 27, 2024 8:02:58 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 Michelle Young, a journalist, author, professor, and Berkshires resident. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed “Rest of River” Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the “Rest of River” clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE’s 13-year “Rest of River” clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.

The exclusion from the T&D Plan of fundamentally

relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

Greenhouse emissions (drastically reduced with rail)

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Safety, including the risk of pedestrian accidents (rail is much safer)

Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure

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very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks

the argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

[Optional: finish with a personal statement about the impact of 40,000+ trucks, e.g. psychological, economic impact on you and/or your family, anything else you would like to add]

Sincerely,

Michelle Young *Founder, [Untapped New York](#)*
Professor of Architecture, Columbia University GSAPP



From: [Nancy McLaughlin](#)
To: [R1Housatonic](#)
Cc: selectboard@town.lee.ma.us; christopher.brittain@town.lee.ma.us
Subject: Comments on GE Transportation plan for the UDF planned for PCB disposal in Lee, MA
Date: Wednesday, January 31, 2024 3:30:55 PM

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

January 31, 2024

[REDACTED]
Lee, MA

EPA New England, Region 1
5 Post Office Square - Suite 100
Boston, MA 02109-3912
R1Housatonic@epa.gov

RE: Planned UDF in Lee, MA for PCB disposal: Comments on GE Transportation plan presentation on Nov. 28, 2024

I attended the EPA/GE meeting on 11/28/23 in Lee, MA where GE presented the transportation plan for transport of contaminated PCBs from the Housatonic River to the planned UDF or to an approved out of state PCB disposal site for the most contaminated sludge. The incomplete plan presented by GE was embarrassing. Not only is the planned PCB dump to be built on a site that was found unsuitable in an earlier EPA plan in 2016, but it deviates from the earlier plan that relied heavily on rail transportation to avoid accidental contact of PCBs to the public. GE protested the 2016 plan which led to confidential mediation where some representatives of the affected towns, also including the EPA, agreed to GE's preference for a local facility and increased use of trucks, without any public input. GE would compensate the towns affected with millions in settlement money for the compromised plan. A cleanup that will only partially clean the PCBs out of the river and its banks, put it in trucks to drive on public streets for 198 days per year for disposal at the UDF.

After years of knowingly dumping PCBs into the Housatonic River and covering up their actions for decades, GE expects the residents of the affected towns to accept their inadequate plan. Overall, the parts of the plan that have been slowly shared with the public include many areas that were devoid of details, and still being studied. It leaves many questions about how much time GE spent looking for the best solutions that would cause the least additional health concerns and inconvenience to the public.

It seems that the cost of the cleanup was their utmost priority. GE is proposing truck movement of the contaminated sludge with an army of trucks driving throughout the affected towns for more than a decade. The trucks in the plan will each carry 16-20 TONS of sediment on an average of 198 days per year for a proposed period of more than 10 years. (approximately 13,000 total truck trips on our roads) Some phases would have up to 30 truck trips per day traveling on local routes.

The routes include traveling on the Main Streets of Lee and Stockbridge. Past local landmarks and cultural sites that attract thousands of locals and tourists. Our tourist economy will be depressed, affecting employment in the area. Main Street in Lee has frequent pedestrian travel, residential housing along the street, restaurants with outdoor seating, the local library and town hall, parking along the road numerous small businesses and an outdoor public area with frequent activities and entertainment.

Questions about possible spills along roadways and concern about public exposure and cleanup of possible accidents was not adequately addressed. Who will handle cleanups of any sludge if there is an accident causing spills of sludge from trucks carrying up to 20 TONS of sludge, covered by a tarp? How much air monitoring will be done and is it mandated? How will these large heavy vehicles damage our roads and who will pay to fix them?

Why no rail transportation? Their answer was that trucks are typically for short distances and rail is for long distances. GE claimed that rail transportation was not feasible because GE does not own the rail sidings that are in place and evidently is not willing to either purchase, lease or build the sides needed to transport by rail. The rail is owned by the Commonwealth of Massachusetts. The railroad tracks follow the river for the planned partial cleanup of identified Reaches to be remediated. We

learned at the meeting in a submitted affidavit from the Housatonic Railroad that GE never contacted the railroad to investigate the possibility and costs of using rail transportation. Housatonic Railroad states that they could not only do the work to transport the contaminated sediment, but could do so at a lower cost and with far fewer trucks.

Many feel that railroad sides should be built along each Reach to accommodate rail transportation at the sites of cleanup to the most extent possible to load directly on the railroad cars to be transported to the UDF by rail. The cost to GE of doing so is irrelevant because they are responsible for the damage to the environment and should do whatever is necessary to protect the public from exposure during the cleanup and when the UDF is operational.

It appears that GE wants to do a cut rate cleanup that will cause much inconvenience as well as further health consequences for people in the affected areas. With GE's history of secrecy and cover up, the residents do not trust that GE will monitor and proceed in the safest way possible. Who will GE answer to? When questions arose in the meeting about how GE would be monitored going forward with testing to make sure the UDF was not leaking and other concerns, EPA Project Lead Dean Tagliaferro suggested that the towns, Lee, Lenox, Stockbridge, Great Barrington and Sheffield should pool the settlement money paid to them by GE to hire a third party who could advise the towns and monitor the process of building the UDF and operational plans for the PCB dump. Maybe I am ill-informed, but I thought that was EPA's job.

It is the consensus of the majority of the public in Lee, MA that we do not accept the local PCB dump adjacent to October Mountain State Forest, to be built on top of an aquifer, near Lee's public water source and close to residential areas in Lee and Lenoxdale. And we do not endorse a transportation plan that depends on heavy, large trucks transporting toxic sludge through the streets of our beautiful towns, endangering the health of our citizens and visitors.

Sincerely,

Nancy McLaughlin

cc: selectboard@town.lee.ma.us
christopher.brittain@lee.ma.us

From: [Pamela Morehouse](#)
To: [R1Housatonic](#)
Subject: Housatonic River
Date: Tuesday, December 5, 2023 5:18:58 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 Officials,

What is the job of the Environmental Protection Agency?

According to your website, the Environmental Protection Agency "protects people and the environment from significant health risks, sponsors and conducts research, and develops and enforces environmental regulations".

For Decades, General Electric has been allowed to poison the Housatonic River running through the beautiful Berkshires of Western Massachusetts. GE will continue to poison the Berkshires with a planned PCB dump in Lee, Massachusetts, unless you DO YOUR JOB and protect the people! I plead with you to act and support a plan to put all of the dredged material on a train out of town to a certified facility that can manage the cancer causing PCB's. The citizens of Lee and the surrounding towns should not be sacrificed so that GE can save a few dollars.

Thank you in advance for your help.

Pamela Morehouse

Lee, MA

From: [patty sharaf](#)
To: [R1Housatonic](#)
Subject: Housatonic Rest of River Transportation & Disposal Plan
Date: Saturday, January 6, 2024 12:23:27 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,

Please do not put this PCB waste mud into trucks driving through our communities.
Much safer on trains.

Thanks,

Patty Sharaf

██████████, Richmond, MA ██████████

From: [Peter Hofman](#)
To: [R1Housatonic](#)
Subject: Comment on GE's PCB Transportation and Disposal Plan
Date: Sunday, January 28, 2024 3:50:27 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 EPA,

Residents of Lee, we're writing to thank EPA for rejecting GE's proposed PCB Transportation and Disposal Plan for the Rest of the River cleanup of the Housatonic River due to the plan's inadequate consideration of rail transportation. We urge you to hold GE's feet to the fire and demand a thorough, rigorous, and objective analysis of using rail for transporting PCB-laden materials. Our goal is to have the maximum use of rail and hydraulic dredging/conveyance as part of the cleanup plan, and minimal use of truck hauling.

Given GE's history of delays and focus on minimizing costs, as well as its inadequate initial attempt, we're concerned that the "reboot" of its PCB Transportation and Disposal Plan won't be serious and will be biased in favor of truck hauling. We are counting on EPA staff to use the highest standards in reviewing GE's revised plan, particularly regarding its examination of rail options. Assuming the revised plan includes the use of rail, we expect GE will also have to update its recently released Quality of Life Plan.

Dr. Charles Kenny, Chair of the Tri-Town Board of Health, as well as other members of the Board of Health, have been thorough and articulate in challenging GE's approach to the transportation plan. Dr. Kenny insightfully noted during the Board of Health-hosted public meeting held November 1 that EPA failed to study the transportation options for the ultimately agreed upon cleanup plan, even though it did an excellent job of investigating other options. Dr. Kenney also articulately criticized the plan at the November 28th public meeting in Lee, appropriately highlighting the baseless dismissal of rail as an option, which GE based upon assumptions rather than research, analysis, and facts. Selectman Bob Jones' reading of the letter from the railroad's attorney reinforced the glaring inadequacy of the plan.

Many avoidable issues exist by relying on trucks, rather than rail, to move PCB-laden materials within and outside of Berkshire County. Here are several we think are important:

- The number alone of PCB-laden trucks, if not the fear of PCBs contaminating the air or spills from accidents, which will undoubtedly occur, will stress residents, and could affect public health and safety, increase noise levels, cause traffic delays, and deteriorate air quality. Heavily burdening certain areas – such as around the two westernmost entrances to the Massachusetts Turnpike – could make such problems in these locations significantly worse.
- While GE will be required to repair roads damaged by truck traffic, it will likely only do so only periodically, meaning our roads could be in disrepair for extended periods during the cleanup process, creating potential road hazards, and potentially increasing vehicle repairs for residents, businesses, and visitors.
- The many hills in the county create challenges for trucks burdened with extremely heavy loads and could deteriorate air quality and further affect traffic.
- Some of the suggested routes do not normally have heavy truck traffic, which will increase noise levels and air quality problems, and could create safety hazards, adversely affecting the quality of life in these areas.

- The widespread knowledge that more than 900,00 cubic yards of PCB-contaminated materials will be disposed of in Lee will be bad enough to make tourists think twice about coming, which will be made far worse if the materials are transported by tens of thousands of truckloads. EPA must know how dependent our economy is on visitors/tourists. You might not know that most of our cultural venues still haven't fully recovered from the effects of COVID. The adverse effects on tourism could be far worse due to all these truckloads of PCB-laden materials traveling across the Berkshires for more than 10 years! It's one thing for the EPA to inform people at a public meeting that the transport of PCBs via truck will be safe and that any spills/accidents won't be major public health issues. It's quite another when hundreds of thousands of tourists are making personal decisions whether to come here and hear "PCBs."

From what we've heard, using rail could avoid or at least mitigate these issues and could accelerate the cleanup schedule, which would be good for the region.

Until GE completes a thorough analysis of using rail, we won't know what the cost implications are. We are concerned that GE will downplay rail if it might be more costly. As has happened too often in the past, we fear GE will argue for the cheapest approach. Once again, it will be GE's pocketbook versus public health and safety and the Berkshires' environmental and economic well-being. We already have the UDF in Lee to save GE money. If using rail is feasible, we urge EPA with all our hearts to require GE to use rail as much as possible

We need to point out that GE's complaints about cost – as in 2016 and possibly now – ring hollow, almost laughably so, if the consequences weren't so damaging. Why? From 2016 through last September, the company bought back about \$26 BILLION of its stock, \$945 million just in the first nine months of 2023, more than \$300 million each quarter. It's been more important for GE to boost its stock price using this non-productive gimmick than to clean up the Housatonic River in a way that would minimize public health, safety, environmental, and economic risks to the Berkshires. The bottom line is that GE can well afford to do what's right in cleaning up the Housatonic River. We're counting on the EPA to ensure that happens. The first step is to ensure the cleanup takes full advantage of rail transportation, where hydraulic dredging can't be used.

Thank you for your attention.

Peter and Phyllis Hofman

Lee, MA

From: [Philip McCaffrey](#)
To: [R1Housatonic](#)
Subject: Housatonic Rest of river remediation plan
Date: Tuesday, January 30, 2024 6:05:41 PM

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

I strongly urge you to employ **rail** rather than truck transport of all hazardous wastes during the remediation process.

With thanks,

Philip McCaffrey

████████████████████, Stockbridge, MA ██████████

From: [Philip Rosenberg](#)
To: [R1Housatonic](#)
Subject: Housatonic Clean-up
Date: Monday, January 29, 2024 9:48:55 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 writing to express my utter dismay over GE's proposal to transport PCBs by truck. What was GE thinking? There are railroad tacks that run along the Housatonic. Why not pump the contaminated soil to train cars that can then transport the soil along the exiting tracks? Why impose exhaust, noise, congestion and risk of accidents associated with trucking when there's an easier way to transport the soil. It's a no-brainer. I can't help but think that GE is attempting to shirk the same kind of responsibility to move soils safely that GE tried to avoid when GE opposed the clean up. Once again, it erodes any trust that the community has in GE.

From: [Philip Rosenberg](#)
To: [R1Housatonic](#)
Subject: Housatonic Rest of River Clean-Up/General Electric Transportation Proposal
Date: Wednesday, November 29, 2023 9:42:35 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 submitting this comment on General Electric's proposal to transport PCB toxic waste dredged from the Housatonic River via truck transportation. More than 55,000 truck transports. The notion of trucks trekking the narrow roads and through the small towns in the Berkshires, including Lee, Lenox, Stockbridge and Great Barrington, with tons of PCB waste brings to mind the saying: the cure is worse than the disease. Perhaps, by a stroke of luck, there are currently rail tracks that lie along the entire stretch of the River. Indeed, in vast segments, the railroad tracks are a "stone's throw" from the River. It is puzzling that General Electric has not developed a transportation plan that utilizes the existing rail infrastructure in order to avoid the disruptive, pollution-choking, noise-jarring, and accident-susceptible trucking concept. Again, puzzling.

While General Electric's slogan is that they "bring good things to life", nothing could be farther from the truth with respect to its corporate citizenship in the Berkshires. From polluting our River, expending millions of dollars to lobby against a clean-up, to proposing a half-baked transport plan that rests on corporate convenience and priorities, General Electric has demonstrated an utter disregard of the best interests of the Berkshires and its residents. General Electric must be directed to take the residents' interests into account, instead of its own myopic corporate priorities, to propose a rail transport plan that is safe, convenient and non-disruptive.

Philip Rosenberg

From: [David Eppler](#)
To: [R1Housatonic](#)
Cc: [Resa Eppler](#)
Subject: Public comment for Rest of River PCB Cleanup Project
Date: Saturday, January 27, 2024 8:06:34 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,

We are home owners and reside at [REDACTED] Stockbridge, MA [REDACTED]. We are writing to strongly oppose the original transportation plan for the upcoming Rest of River PCB cleanup project and agree with the EPA's recent statement that the plan must rely much more heavily on rail to transport the material to the local landfill and out of state.

We are deeply concerned about the health and safety impact of the use of trucks to transport PCB-laden material in the original proposal. Under that plan thousands of trucks would pass our home on Route 183, a quiet country road. We are concerned about the noise and air pollution those trucks bring and the congestion they may cause, especially as they pass important cultural and community institutions along the way such as the Berkshire Botanical Garden, Kripalu, Berkshire Country Day School, the Stockbridge Bowl Boat Ramp, Tanglewood and the approach to Lenox Town Center. We are also concerned about the health impact of trucks carrying PCB- laden material. The potential for leakage of toxic sludge taken from the river and the aerisolation of PCBs cannot be minimized or dismissed.

We embrace the EPA's revised advice, supported by each of the impacted towns and the Board of Health, that the transportation plan should favor rail and eliminate trucks to transport the polluted material. Rail authorities have confirmed that there are existing tracks to safely and efficiently move the soil from the river to the disposal sites. We hope you will consider the nearly unanimous view of the impacted community and revise the plan accordingly. We would also appreciate being informed of any changes in the proposal that are being considered.

Sincerely,

Resa and David Eppler
[REDACTED]

From: [Robert Davenport](#)
To: [R1Housatonic](#)
Subject: Housatonic river PCB transportation plan
Date: Friday, January 26, 2024 10:22:36 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:

As a resident in the town of Lenox living at [REDACTED] in Lenox Dale I am writing this letter to you to voice my concerns about the planned transport of PCBs from the Housatonic River to the planned Upland Disposal Facility (UDF) in Lee as proposed by the engineers hired by GE. There are several reasons that the use of trucks to transport the materials from the river to the UDF is problematic. First, the trucks would be traveling on roads that were not designed to have heavy repeated vehicle use. Second, as a standard railcar can transport four times the amount of material that one truckload can, using rail to transport the material would decrease the number of trips to the UDF four-fold. Third, since the rail line essentially runs right next to the river there would most likely be minimal use of trucks to transport the material to the UDF. Fourth, material that is designated to be shipped out-of-State to a remote toxic waste facility could be loaded onto rail cars directly from the dredging sites to be transported to that facility without having to transport four times as many truck loads through our towns on their way to the remote site. Fifth, high concentration materials that have been identified to be transferred to a remote facility can be transported immediately by rail without having to wait for the UDF to be completed. Sixth, having a rail line spur built directly to the UDF would serve two purposes; it would allow for a minimal amount of transfers of PCBs from the river to the UDF, and could serve as an efficient way to remove the material from the UDF to a remote toxic waste facility should that become necessary in the future.

Thank you, Robert C. Davenport email: [REDACTED]

From: [Roberta Bianco](#)
To: [Tagliaferro, Dean](#); [R1Housatonic](#)
Cc: [Clean Collective](#); [Paul.Mark@masenate.gov](#); [Tricia.Farley-Bouvier@mahouse.gov](#); [rep.smitty@mahouse.gov](#); [john.barrett@mahouse.gov](#)
Subject: Public comment on Housatonic "Rest of River" Transportation and Disposal Plan
Date: Sunday, January 28, 2024 2:30:14 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 am Roberta Bianco, [REDACTED] Lenox Ma [REDACTED]. I have lived 38 years as a full time Lenox resident. I live within 1/4 of a mile of the proposed truck routes, 1/2 mile from Willow Hill Road and approximately 1.5 miles from the PCB land fill, you refer to as the UDF.

With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed "Rest of River" Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023.

With the following comments, I support for the integration of rail transport in the "Rest of River" clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

I request GE/Arcadis should be required to include the follow in a revised proposal:

- A comprehensive cost-benefit analysis on the use of rail versus trucks.
- Greenhouse emissions data (rail vs truck)
- Noise pollution data (rail vs truck)
- Safety, including the risk of pedestrian accidents (just the town of Lee, has 17 crosswalks from the Mass Turnpike exit/entrance to Canal St. Lee)
- Revise the number of staging areas. They should be held to a minimum, ideally 2.
- Hydraulic extraction and conveyance should be mandatory to move water saturated contaminated soil to staging areas via pipe.
- Solid materials produced at South County staging area should be transported to UDF and/or out of town by rail.
- To expedite the "cleanup" immediately all contaminated materials should be transported out of state by rail, until UDF is build.
- The Quality of Life report should include data on the devaluation of homes, property and businesses on the proposed truck routes vs rail.

Lastly, I would like EPA to reconsider consider their position on the removal of only 20-30% of PCB from the River. If an oncologist told you that they would be removing only 20-30% of your cancerous tumor but not to worry because the remaining 70-80% might not kill you, would you believe them?

Roberta Bianco

From: [REDACTED]
To: R1Housatonic
Cc: cleanberkshirecollective@gmail.com; cketchen@townoflenox.com
Subject: Rest of River GE transport plan
Date: Sunday, January 7, 2024 12:07:40 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,

Maximize hydraulic removal to the fullest extent possible in all the 5A, 5B, 5C and backwaters.

Maximize rail transport not trucks.

In regard to using Roaring Brook Rd as the primary route from the north: while seemingly a short and direct route from East New Lenox and New Lenox Roads this is not a viable or reasonable alternative. It has a very sharp corner on the paved section with very poor sight lines and no room for a truck loaded with dirt to pass another large truck like a fedex, oil delivery, garbage truck etc and for a person walking on that corner. Once a truck gets onto the dirt section there is a severely (eroded down to bedrock) hill with an approximately a 20% grade. The entire rest of the road has not been maintained for years and has several wash outs. In many sections it is very narrow. It is used heavily every single day by walkers, dog walkers, hikers, cyclists, bird watchers. When its snow/ice covered its used by snowmobiles, ice fisherman and cross country skiers as well as pedestrians.

This is one of the only flat roads with almost no motorized vehicles that exists in Lenox and is especially attractive to passive recreation users. This route cannot be utilized by these large trucks without huge upgrades to the tread, width and sight lines.

GE claims that 7 trucks per day will use this route, thus to return is another 7 trips. That's 14 trips per day for at least 13 maybe more years. GE needs to utilize the railroad instead of Roaring Brook Rd. The cost of upgrading this road for intense heavy truck traffic has not been addressed nor has the impact of losing a valuable recreational resource been taken into account vs using the railroad especially since people using the river will also be losing their access to a heavily used recreational resource for many years.

Thank you

Ruth Wheeler

[REDACTED] Lenox Ma

From: [Sally Underwood-Miller](#)
To: [R1Housatonic](#)
Subject: Rail transport
Date: Sunday, January 7, 2024 9:32:33 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:

Our beautiful Berkshires have already been contaminated, literally and figuratively, by GE. I am part of a former GE family. My grandfather served as head of Public Works in Pittsfield before and during the war years. My uncle's job was Power Transformer sales for the "East Coast and the world". My father was one of the early computer programmers, fired when GE got caught with its proverbial pants down when there was the scandal with price fixing with Westinghouse. My uncle died of cancer, one of my cousins died of breast cancer, the rest of us have all battled breast cancer.

There is evidence that dogs of families living along the Housatonic have a significantly higher incidence of cancers. Human incidents are confidential.

Yet you would willingly send hundreds of truckloads of this poison through our sleepy little towns that depend on tourism -- Norman Rockwell's beautiful little Stockbridge.

The Housatonic Railroad has offered to retool to carry these toxic substances, eliminating this next potential scourge on our community. Please, for the love of all that is holy, take them up on it!

Sally Underwood-Miller
Stockbridge, MA

I don't want to protect the environment. I want to live in a world where the environment doesn't need protecting.

From: [Sandy Greenspan](#)
To: [R1Housatonic](#)
Subject: Housatonic river
Date: Thursday, December 21, 2023 11:35:22 AM

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

Dredging will only cause more pollution. I am a Stockbridge homeowner with a property on the river and I oppose all dredging.

From: [Sandra Kreis Lacey](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com
Subject: Sandy K. Lacey - Public Comment on Rest of River General Electric T&D Plan
Date: Saturday, January 27, 2024 8:57:12 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,

My name is Sandy K. Lacey and I am a resident of Lenox, MA. I have my Master's Degree in Energy & Environmental Policy from the Fletcher School at Tufts University and spent several years working on energy and environmental innovation under Governor Deval Patrick. I am taken aback by the lack of ingenuity in the entire approach to the "Rest of River" plan and believe this could be an incredible exercise in leveraging creative thought and technological breakthrough to right an environmental justice wrong.

With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed "Rest of River" Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the "Rest of River" clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE's 13-year "Rest of River" clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

- The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.
- The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

- Greenhouse emissions (drastically reduced with rail)
- Noise pollution (drastically increased with use of trucks)
- Safety, including the risk of pedestrian accidents (rail is much safer)
- Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure
- A real feasibility study on the use of rail, which takes into account all of the relevant details, including that:
 - very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks
 - the argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

Finally, the proposed trucking routes are intrusive to our community and directly threaten the health of our young children. For example, the trucking routes associated with Reaches 5b, 5c, 6 and 7 pass directly in front of Morris Elementary School, trucking right through downtown Lenox. The proposed scenario has some years in which 15.89 dump trucks a day will be rumbling down our streets, passing less than 8 yards from the school's playground. Our small town relies heavily on tourism, and is home to many cultural institutions including Tanglewood, which is also abutted by the proposed trucking routes mentioned above. If **any** trucking is proposed by GE, we demand a full and comprehensive noise pollution study, air

pollution study, and tourism impact study.

While our residents have been told that the UDF is a "done deal" and that we have to accept it, in these public comments I would also like to voice my firm dissent against the UDF and demand that the PCB remediation remove the toxins from the Berkshires entirely. The proposed UDF site is close to another school (Montessori School of the Berkshires), threatens my fellow town residents in Lenox Dale and neighbors in Lee, and threatens wildlife as it is sited in the largest state forest in Massachusetts, October Mountain State Park. I even question the validity of the 2020 Rest of River mediation agreement, as Lenox was represented by a private citizen in the closed door negotiations and not a publicly-elected official. We didn't ask for this pollution and our community, in which many of us hold deep respect for our natural environment, should not have to continue to bear the health and environmental effects of GE's negligence for generations to come.

With respect,

Sandy K. Lacey

Lenox, MA

From: [Sarah Hatch](#)
To: [R1Housatonic](#)
Subject: GE Transportation plans
Date: Tuesday, January 23, 2024 8:58:46 PM

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

To : EPA Housatonic River clean-up staff

The Housatonic River runs along the rail tracks used only once or twice a day for freight. At the same time if you sit in the towns of Lee and Stockbridge MA the truck traffic is already running one after another as they shake the buildings.

This is a tourist economy in a rural area. Does it make sense to add to this traffic?

The transport of all the contaminated slush from the river needs to be by rail as near and far as possible? It will reduce air pollution, limit the further deterioration of roads and bridges and reduce the chances of accidents and spills.

Please do the job right and not settle for the cheaper solution proposed by GE but instead stand for the best solution.

Sarah Hatch, Citizen
& Member of Lenox Land Trust BOD

[REDACTED]
Lenox MA
[REDACTED]

Sent from my iPhone

From: [Scott Olsen](#)
To: [R1Housatonic](#)
Subject: PCB transportation
Date: Wednesday, January 31, 2024 11:14:27 PM

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

GE polluted our river without a care. The EPA's job is to enforce our laws and keep our environment and citizens safe.

I do not believe your removal and transport plans will do either. Why is there so much emphasis on dump trucks when there are railroad tracks that follow the river and pass right by your proposed storage facility? I stated at a public meeting that trains should be used. I was told "we are looking into that." Based on what the Railroad told us recently, you did not. A huge amount of opposition could be alleviated by adding railroad sidings and eliminating thousands of dumptrucks full of toxins driving through our neighborhoods.

The use of Roaring Brook Road should be used as opposed to New Lenox Road and East Street. Instead of driving past dozens of neighborhoods you could take a route that passes a dozen houses and once again leads right where you want to go.

We didn't ask for this mess. We didn't get a chance to vote on any of it. We are being forced to deal with it. I cannot imagine dealing with constant dumptrucks with flimsy tarps hauling toxins through our small town. Nice walks with my son through our neighborhood will end. I have lived off of New Lenox Road for 14 years. A nice quiet place to raise a family. Trucks are excluded here, but I should trust you.

Seeing your previous work in Pittsfield tells me I should not. Your great work dredging the Hudson River tells me I should not.

Do better!

From: [REDACTED]
To: [R1Housatonic](#)
Subject: Trains over trucks.
Date: Thursday, February 1, 2024 12:09:28 AM

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

Please value you our air quality.

Sharon Gregory, [REDACTED], Great Barrington MA [REDACTED]

From: [Sherry Steiner](#)
To: [R1Housatonic](#)
Subject: GE's truck transportation plan COMMENT
Date: Tuesday, December 26, 2023 10:15:44 AM

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

PLEASE DO NOT ALLOW GE TO TRANSPORT THE PCBs THROUGH THE VILLAGE OF HOUSATONIC!
HAVEN'T THEY DONE ENOUGH DAMAGE TO OUR RIVER?

AREN'T THE PEOPLE OF HOUSATONIC SUFFERING ENOUGH WITH CONTAMINATED WATER FROM THE HWW THAT WE HAVE TO PAY FOR?

PLEASE HELP ALLEVIATE THE STRESS OF THE PEOPLE IN HOUSATONIC BY TRANSPORTING THE PCBs BY RAIL ONLY.

Sherry Steiner
Housatonic MA
since 1985

From: [Shirley Miller](#)
To: [R1Housatonic](#)
Subject: PCB cleanup
Date: Sunday, January 28, 2024 1:55:44 PM

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

To the EPA

Why are we fighting the Rest of the River contract? That is because we don't want PCBs in our river to be taken out and deposited in local landfills or carted out by truck to other places. We DO want the PCBs destroyed!

There is a better way for PCB remediation that eliminates the need to take them out of the river. Therefore the problem of transporting PCBs elsewhere is eliminated. No trucks or trains needed!

There is tested scientific evidence that there is a viable solution to destroying the PCBs in place and restoring the river.

There are a number of ways to do this. I found one in the NIH Environmental Health Sciences article in Environmental Factor: Nature-based remediation technologies help clean up PCB Contamination, July 2023 (<https://factor.niehs.nih.gov>)

A second article in Science Direct-Chemosphere, volume 78 Issue 9 Feb. 2010 Extraction of PCBs and water from river sediment using liquified dimethyl ether as a solvent (<https://doi/10.1016/j.chemosphere.2009.12.017>)

Third article: Science direct Journal of Environmental Chemical Engineering, volume 10, issue 3 June 2022 107839 Bioremediation Technologies

These are just a few publications of the information that is out there on PCB remediation.

In addition to that there is a new EPA Rule that will be effective Feb 26 2024 that could allow for changing the way the river is cleaned of PCBs.

And lastly this is a much cheaper way of handling the cleanup and will not do further damage to the environment. We can move on to the Restoration of the Watershed contract that has already been funded. Connecticut has already done this and the riverbanks are restored and useable for recreation.

From: [Stephen Lacey](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com; rep.smitty@mahouse.gov
Subject: RE: Stephen Lacey Public Comment on Rest of River General Electric T&D Plan
Date: Thursday, January 18, 2024 7:38:25 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,

My name is Stephen Lacey, and I'm a resident of Lenox, Massachusetts. I live in the center of town with my four-year-old daughter and wife — right along the route where trucks full of PCBs could be passing regularly.

I am submitting my comments about the Rest of River Transportation and Disposal Plan that was crafted by Acadis on behalf of GE in October of 2023.

I would like to express my firm request for a rewrite of the disposal plan to include a comprehensive analysis of rail for transporting these hazardous chemicals. The absence of rail from this analysis is glaring, and should be thoroughly reviewed and revised.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I am also requesting that EPA extend the public comment period to allow for robust citizen input, given the critical importance of this plan for our public health community character, and near universal local opposition to the plan.

I am concerned that the lack of analysis on rail transport leaves out critical factors such as climate pollution, local air pollution, noise pollution, pedestrian safety, infrastructure costs, and traffic problems. Rail is a much safer option that can help mitigate many of these potential harms.

I am deeply concerned about the lack of analytical rigor in the current plan. And I implore you to ask GE/Arcadis to rewrite it.

This is a community deeply connected to our natural environment. We are respectfully asking you to help us craft a plan that takes all options into consideration so that we can preserve our quality of life — so that we can clean up our legacy pollution without making new mistakes.

Sincerely,

Stephen Lacey

██████████, Lenox MA ██████████

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: [Steve Ball](#)
To: [R1Housatonic](#)
Subject: Rest of River cleanup transport
Date: Wednesday, December 6, 2023 4:50:53 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:

I attended the transportation presentation on October 31st meeting at Lee High School.

GE needs to shift to rail for all of this clean up; using roadways is atrocious. The presentation cited an insignificant increase in # of trucks per day on routes 7 & 20 in Berkshire County, but does not cite the very, very significant increase in the number of trucks on New Lenox Road, Walker Street, and other streets. The presentation also cited that the number of truck trips would double if material had to be hauled by rail - to the siding and then from the siding - also misleading because, if true, each trip would be a fraction of a mile at each end instead of several miles as presented. And the local rail company encouraged additional sidings, where the work is being done, that would then not require the added trucks at all. The local rail company is interested in helping with the addition of sidings and with connecting current railways to the new disposal area in Lee.

GE needs to change this transportation plan.

Steve

Steve Ball, Shakespeare & Company General Manager

██████████, Lenox, MA ██████████

From: [Steve Turner](#)
To: [R1Housatonic](#)
Cc: cketchen@townoflenox.com; selectboard@town.lee; jim@tritownhealth.org
Subject: PCB Transportation Plan
Date: Sunday, January 21, 2024 10:38:54 AM

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

On two occasions (11/1 and 11/28) The EPA and GE made presentations to the public regarding the transportation of PCB waste from The Housatonic River and its banks and floodplains. Both presentations emphasized the benefits of truck transportation over rail transport.

According to four of the hand-outs from GE on 11/28 (Figures 3-1,3-2,4-1,4-2), truck routes include Crofut Street, Holmes Road, East New Lenox Road and New Lenox Road, yet all of these roads are clearly posted with signs that read "Heavy Commercial Vehicles Excluded". During the 11/28 presentation, the presenter referred to one route as "that road".

On both occasions, presenters repeated that rail transportation would be met with problems of flexibility of scheduling due to a lack of rail sidings for staging vehicles and stockpiling material, yet GE's handout Figure 3-4 identifies 9 "Previously Used Railroad Siding Locations" from Pomeroy Avenue in Pittsfield to The Rising Dam in Housatonic, a distance of only 21 miles by road, probably less by rail.

The Rest of River Mandate is understood to include a clean up of material from the river from Pittsfield to the Connecticut Border, yet nothing in these two presentations discussed work in Reach 9 from the Rising Dam south through Great Barrington, Sheffield and Ashley Falls (more trucks on Route 7?).

The most glaring oversight in these two presentations was the fact that GE did not contact the Housatonic Railroad to discuss options.

It is proposed that trucking this waste will affect the communities of Hancock, Pittsfield, Lenox, Lenoxdale, Lee, Stockbridge, West Stockbridge, Housatonic, and Great Barrington (maybe Sheffield and Ashley Falls) for 13-15 years. That is 13-15 years of noise, traffic, pollution (diesel and maybe PCB particles), wear and tear on our roads and bridges, and disregard for the citizens who will be forced to endure these disruptions.

It is because of these oversights that I feel the rail transportation of PCB waste by trucks should be reviewed more thoroughly.

Steve Turner

[REDACTED]

Lenox

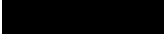
From: [Stewart Edelstein](#)
To: [R1Housatonic](#)
Subject: GE's Clean-Up of PCBs in the Berkshires: rail, not trucks
Date: Thursday, December 14, 2023 8:32:39 AM

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

To the EPA:

I live in Stockbridge, Massachusetts, on Church Street, one of the streets the EPA proposes to use to haul many truckloads of GE's toxic waste for disposal. I strongly oppose that plan, because it is harmful to my health, the health of my family, and the health and wellbeing of my neighbors, would create disruptive and unsettling noise, and cause unnecessary traffic congestion. The EPA has a far better alternative: rail.

I urge the EPA to scrap any plan for truckloads of toxic waste to be hauled through the Berkshires, and instead urge the EPA's use the more efficient and much less harmful rail option.

Stewart Edelstein

Stockbridge, Massachusetts

1/29/2024

To the Mass EPA,

This letter is in regards to the Rest of the River Housatonic cleanup.

As a member of the Berkshire Community for 50+ years and a resident of Lenox Ma for 37 of those years, I am aware of The Berkshire's rare, beautiful and natural landscape. It is a landscape that is always in need of protection from outside forces that do not have the best of intentions.

GE was an inside force at one time that did much damage to our natural beauty by dumping poisonous chemicals into the countywide Housatonic River. GE left town some 30 years ago and now they are back to clean up their mess. Seems like this should be good news for Berkshire County, However, after listening to other people who have been following this attempt by GE and the EPA, going to meetings and reading letters and articles from people who have educated themselves on the topic, it seems to me that GE has plans to take the most arcane, inexpensive and most destructive route to cleaning-up the river.

Diesel-fueled dump trucks are noisy, dirty and heavy. 6 – 15 of them making daily runs on our roadways for 10 – 15 years makes for not only a lot of noise, but pollution and lots of wear and tear on our roads. Why wasn't rail transportation looked at more carefully? I can only assume it entailed extra work and money. Why was there no discussion with the railroad personnel to see what could be worked out?

I feel this whole plan has been solely directed by GE and their objective was to watch their pocketbook, and keep the residents at bay by pretending to have our interest at the center of the plan. I hope the EPA will have GE looking at rail and hydraulic removal.

I am so disappointed. We know GE is worth a lot of money and they could afford to clean up their mess accurately. I no longer have faith they will do so if not forced to do it correctly. I now seriously doubt their intentions for building the dump in the first place. Aren't they the big innovators of all? Do they seriously believe in this day and age that diesel-fueled, noisy trucks, let alone a dump, is the best means of disposing poisons?

Sincerely,
Sue Turner

 . Lenox

From: [Susan May](#)
To: [R1Housatonic](#)
Subject: Rest of River Plan
Date: Tuesday, January 30, 2024 12:51:11 PM

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

The Berkshire region of Massachusetts is cherished for its beautiful natural environment. The scenery is spectacular and the closeness to nature that it fosters is immeasurable. Many people choose to live and visit here because of the scenery and the proximity to hiking and biking trails, downhill skiing and cross-country, snowshoe, swimming and boating in the many lakes, gardening, and other outdoor activities. It promotes an active and healthy life.

The economy in this area is based on tourism. There is no major industry since General Electric moved out of the area. That move caused an economic downturn with widespread unemployment, shops and businesses closing, and causing the city of Pittsfield to suffer major economic loss. Being equi-distant from New York City and Boston metropolitan areas, the landscape, outdoor activities, and cultural attractions draw many visitors who stay at hotels and bed and breakfasts, eat at restaurants, enjoy activities such as Tanglewood and shop at our local stores. The Berkshires should not have these attractions tarnished with a toxic dump being constructed and filled with toxic PCBs.

Because GE caused the economic downturn by leaving the area and polluting the Housatonic River, it should not be allowed to pollute it again by creating a toxic dump site for PCBs in the Berkshires. Nobody can predict the future and guarantee that the dump will not leak over time. All of the material dredged up should be shipped out of the area. I understand that the dump issue is no longer up for debate but if it is allowed, toxic material should be brought to it by rail instead of using trucks on the local roads. Despite precautions, there are bound to be truck accidents on the roads within the 13 year period of the cleanup. Many of the rural roads are narrow, winding, hilly, often foggy and not well lit when there is early dusk in winter. Winter also brings hazards of ice and snow on roads. Despite the towns' road crews plowing the snow, roads can melt during the day and freeze again at night, making the ice unpredictable.

Transporting the PCB waste to the dump site should be done by rail. It is less likely to have accidental spills and if there are any, they will be in less heavily trafficked areas. I live in the town of Lenox and was appalled at the idea of trucks hauling toxic waste traveling down Route 183 from Stockbridge to Lenox. Just in one small stretch of the road, it passes a private school, Kripalu (a health retreat), Tanglewood, Morris Elementary School and then through the center of Lenox. No. Please don't let this happen!

Sincerely,
Susan May
Lenox, MA

To: Environmental Protection Agency sent by email to R1Housatonic@epa.gov

Attention: Mr. Dean Tagliaferro, EPA Project Coordinator U.S. Environmental Protection Agency

Date: January 31, 2024

Re: GE-Pittsfield/Housatonic River Site Rest of River (GEC850) On-Site and Off-Site Transportation and Disposal Plan dated October 31, 2023 (“GE Transportation Plan”)

Dear Environmental Protection Agency Team:

I own real property and a home located at [REDACTED] in Lenox Dale, MA [REDACTED]. I reside there full time. The PCB contamination in the Rest of River area is a risk to my health and my property value. As a result, I am keenly concerned that the removal and disposal plans, including transportation, be conducted in a manner that is as effective, safe, and non-disruptive as possible.

I appreciate the opportunity provided by the EPA for public comment and respectfully request that my comments be considered by EPA in overseeing and regulating the Rest of River PCB removal project.

SPECIFIC CONCERNS ABOUT THE GE TRANSPORTATION PLAN

I have specific concerns that I ask the EPA to require GE to modify relating to the GE Transportation Plan.

For the safety and preservation of a reasonable living standard for Lenox residents, the GE Transportation Plan must be modified to greatly reduce the large truck traffic, especially through residential areas, by prioritizing rail over truck transportation and also evaluating the use of hydraulic dredging and conveyance measures.

The GE Transportation Plan calls for the use of tens of thousands of Large Trucks. Much of the area to be cleaned up is very near the rail tracks, yet the GE Transportation Plan proposes trucking the contaminated material away from the rail tracks, through residential areas, and then back near the rail tracks to reach the Upland Disposal Facility or the Highway. The GE Transportation Plan calls for the use of “large trucks” as defined by the Federal Highway Administration. In this letter such large trucks are referred to as “Disposal Trucks.” The GE Transportation Plan estimates that there will be 32,000-64,000 Disposal Truck trips over the life of the project, with details showing 180-360 Disposal Truck trips per day.

The Railroad Company says use of rail is feasible, yet GE failed to even ask the Railroad Company for an analysis. The Berkshire Eagle has reported that the Housatonic Railroad Company, which owns and operates the tracks that run generally alongside the Housatonic River, stated they were never contacted by GE to provide assessments about the use of rail, and that the Company could construct loading areas to facilitate the use of rail transportation. I also am baffled by the statement in the GE Transportation Plan that scheduling rail traffic may be a problem. I can hear the trains from my yard, and there is not frequent train traffic.

I have copied our Senators and Congress Representative and Secretary of Transportation to implore them to direct that some of the infrastructure bill monies be spent promptly to create the necessary rail

loading areas – after the cleanup is completed, these rail loading areas will facilitate business usage of rail transportation.

The GE Transportation Plan needs to be modified to include hydraulic dredging and conveyance as an alternative to Disposal Truck transportation where feasible, particularly through residential areas. I agree with the points made by Weston & Sampson, expert advisors to the Town of Lenox, in their draft report dated January 22, 2024 addressed to Christopher Ketchen, Town Manager regarding the benefits of such an alternative to Disposal Trucks.

To the extent Disposal Trucks are used in the project, the roads on the routes must be evaluated to assure they have adequate width, shoulder, and road base the size and for weight of the proposed Disposal Truck traffic. Certain of the roads proposed to be used in the GE Transportation Plan, including Walker Street, Housatonic Street and New Lenox Road are narrow, with only one lane for traffic in each direction and portions with no shoulder or very narrow shoulders. These roads are critical routes for traffic to schools, the transfer station, and the Lenox Dale Post Office.

Where truck transportation is used, there must be safeguards for the Town of Lenox and those residing, working, or recreating in Lenox.

US Department of Transportation data includes expected death and injury rates associated with the use of Large Trucks. For example, the *US Department of Transportation Large Truck and Bus Crash Facts 2019, published in October 2021 by the Federal Motor Carrier Safety Administration Analysis Division*, reviews large truck fatalities and injuries from 1975 to 2019. It shows that thousands of people are killed in the US each year and thousands more are injured due to large truck accidents with pedestrians, bicyclists, passenger cars, school buses and other trucks. These risks, along with air pollution and traffic congestion are reason to eliminate the use of Disposal Trucks whenever possible. When Disposal Trucks must be used, GE should be required to mitigate the risks as described below.

There must be an assessment or surcharge paid to the Town of Lenox for each mile driven on roads in Lenox by Disposal Trucks. The community will require compensation beyond the Rest of River settlement payment to cover (1) additional traffic police, signs, lights, etc., all to try to mitigate the expected deaths and injuries expected from Disposal Truck traffic in the volumes proposed by the GE Transportation Plan; (2) monitors (humans, cameras, and other technology) to ensure that the contaminated materials carried by the Disposal Trucks is well secured and not being dispersed along the route, as well as clean up teams to promptly and safely remove any contaminated materials that do end up anywhere in Lenox (whether in an accident or because a load was not well secured); and (3) repair the roads from the wear and tear associated with Disposal Trucks carrying heavy loads. EPA should direct that GE pay such assessment directly to the Town of Lenox -- while GE might pass such assessment costs on to the trucking companies, the Town should not be burdened by dealing with the various trucking companies.

EPA also should require that GE must verify that the owners of any Disposal Trucks that will travel on Lenox Streets carry adequate insurance from highly rated insurance companies so that there will be funds available for any injuries or deaths occurring in Lenox caused by accidents, negligence or other acts of the Disposal Truck owners and drivers or other PCB clean-up workers. The insurance policies should name the Town of Lenox as a covered party.

The GE Transportation Plan needs to be amended regarding the use of two Lenox streets - Walker Street and Housatonic Street. Except for a few local small businesses, the portion of these streets included in the GE Transportation Plan truck routes are residential streets. Both streets are main routes for students and teachers going to and from Lenox Memorial Middle and High School on East Street in Lenox, whether by bus, auto, bicycle or on foot. Walker Street is also the main route for students going to and from the Montessori School of the Berkshires on Patterson Street. These are also roads where we frequently see school sports teams running, and guests from local resorts bicycling. It would be preferable if both Walker and Housatonic Streets were not used at all for Disposal Trucks.

If it is not possible to avoid these streets the following reasonable safeguards to minimize potential harm should be required:

1. No Disposal Trucks should be permitted on those roads on days LMMHS or the Montessori School of the Berkshires are in session from 6am to 6pm to avoid school-related traffic. Note that in addition to the school day, both schools host sporting events and other after school activities, and the school administrators should be contacted to coordinate dates and hours when truck traffic would create too much risk to the children in our community.
2. It is well-established that truck traffic results in injuries, and fatalities, as noted in Department of Transportation data above. On any date that Disposal Trucks will travel on Housatonic, Walker, East, Golden Hill, Patterson, or Catherine Streets (and additional streets noted by school officials as student routes) during times that any students may be anticipated to be at, or traveling to/from, school, there shall be traffic police at key locations to help students cross streets, anticipate blind spots for Disposal Trucks, etc.

PLEASE REQUIRE THAT FUTURE GE DESIGN AND WORK PLANS BE COMPLETE AND REALISTIC

I also ask that the EPA direct GE to submit more complete and realistic work plans for future aspects of the project. I do not believe a reasonable person would conclude that the GE Transportation Plan was realistic, safe, or efficient. I believe one might reasonably conclude that submission of the inadequate GE Transportation Plan was a delaying tactic. The PCB contamination in the Rest of River area has existed for decades and was made worse by past GE ineffective clean-up actions. I ask EPA to press GE for a workable revised transportation plan, as well as reasonable, safe, effective, and timely work plans for future phases of the project.

Respectfully submitted,

Susan Ellen Wolf

Susan Ellen Wolf

cc: [REDACTED]
Massachusetts Department of Environmental Protection Bureau of Waste Site Cleanup, Special Projects 436 Dwight Street Springfield, Massachusetts 01103 Attention: GE Housatonic Removal Action Project Manager
Senator Elizabeth Warren
Senator Edward J. Markey
Representative Richard E. Neal
Transportation Secretary Pete Buttigieg

From: [Terry Wise](#)
To: [R1Housatonic](#)
Subject: GE river clean up
Date: Sunday, January 28, 2024 9:50:16 AM

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

To the EPA:

I have been following the news and various community meetings regarding the Rest of the River clean up of the Housatonic River of GE's PCB toxins. While I am unhappy about many aspects of the clean up proposal, there is apparently only one part of it still under open discussion — that of transport of the dredged PCB sludge to disposal facilities.

I STRONGLY oppose the use of thousands of dump truck trips through our historic towns and back roads. We cannot afford the wear and tear on our roads. Our Berkshire economy is reliant on tourism to our “quaint” lovely villages, which would be spoiled by multiple heavy dump truck trips per day through our valuable scenery.

I STRONGLY support the use of rail transport for this purpose. The state recently upgraded all tracks on the Housatonic Line, and the Housatonic Railroad leadership has expressed an interest in providing this service and to help with any siding upgrades needed.

If this is a matter of economic benefit to GE, with a new side business of trucking toxic wastes, versus increased business for a local rail freight company, I truly hope the local business wins out. GE has already taken enough from this community and left their garbage and toxins and unusable buildings behind. Please support our local economy and our local people.

Thank you,

Terry

Terry Wise
[REDACTED], Stockbridge, MA
[REDACTED]

From: [Theodore Pulfer- Terino](#)
To: [R1Housatonic](#)
Cc: selectboard@town.lee.ma.us
Subject: Housatonic PCB Dump Alternative
Date: Wednesday, November 29, 2023 3:13:49 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,

My name is Theodore Pulfer-Terino. I work for The Chamberlain Group (In Great Barrington) making and designing medical models both for hands on surgical training and for medical device companies to show their tools off to prospective clients and surgical centers.

Our innovative company enables clients to show what their products can do in real time to help better save lives. The Housatonic river is a stones throw away.

My wife Jane Burns and I live on [REDACTED] in Lee Ma. The Housatonic river is literally in our back yard where bald eagles nest and plant life and wildlife thrive. We are very concerned with GE's proposed "dredge and dump." We attended a town hall meeting last night concerning this and it was both extremely illuminating and horribly concerning.

Having just recently had asbestos remediated from our house and after seeing the term remediation being tossed around concerning the PCBs in our river, I can't help but visualize this analogy: A team comes to our house to remove old asbestos tile from our kitchen, breaking it into pieces and filling drum "liners" (garbage bags) leaving dust everywhere. The bags are then left at the side of our house. Since they are in "liners" all is fine and good. Not so much. Fortunately the team that removed the toxic tile from our house did a very expensive and professional job, tenting off the work area, having dust removal going at all times using hepa filters and removed every particle of the toxic material from where we live. This is the epitome of remediation and an illustration of the words definition. We hope to have children soon and feel safe knowing that we went through this process despite the hefty fine. We hope GE can use its powerful innovative team and vast financial resources to eradicate the PCBs from the Berkshires making the water and land healthy for future generations to thrive.

Please do not allow PCBs to be dumped on our lands. There are many proposed decisions surrounding this "cleanup" that are totally illogical but the fact that the proposed dump site is over a freshwater aquifer is absolutely dumbfounding. Please have GE clean up their mess and literally remediate the PCBs from our waters. I am not on board with the dredging since the dredging of PCBs in the Hudson River resulted in elevated levels of PCB contamination years after (according to the EPA). However, if this course is set in stone, at least listen to the residents of Berkshire county and get the toxic material out of the Berkshires and into a proper facility for disposal.

Has high heat incineration been considered? Apparently Canada and other major US states utilize this method safely. There are even mobile incinerator units that GE could use! Please see this article from the EPA website for more info:

epa.gov



Thank you for your consideration and please do not let a mess that was created long ago (that has already plagued a large community) be dumped next to the river it was dredged from.

Sent from my iPhone

From: [Thomas Lewis](#)
To: [R1Housatonic](#)
Cc: cleanberkshirecollective@gmail.com
Subject: Thomas Lewis's Public Comment on Rest of River General Electric T&D Plan
Date: Wednesday, January 31, 2024 2:42:45 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 am Thomas Lewis, a longtime resident of Berkshire County. With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed "Rest of River" Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the "Rest of River" clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE's 13-year "Rest of River" clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.

The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public

understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

Greenhouse emissions (drastically reduced with rail)

Noise pollution (drastically increased with use of trucks)

Safety, including the risk of pedestrian accidents (rail is much safer)

Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure

A real feasibility study on the use of rail, which takes into account all of the relevant details, including that:

very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks

the argument GE/Aradis makes that rail will lead to delays is misleading and almost certainly inaccurate.


Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

Professionally I am a trail guide and outdoor sports instructor and coach. I lead excursions on trails, by bicycle and water throughout the Berkshires but specifically near this area of “remediation” in central Berkshires County. The noise, emissions, traffic, and inevitable accidents that will occur with the addition of 40,000 large trucks on small county roads is unacceptable for local residents as well as the visitors whose economic spending the area depends upon.

Thank you for your time and consideration.

Thomas Lewis

Pittsfield, MA 

Sent from my iPhone

From: [Tom Farley](#)
To: [R1Housatonic](#)
Subject: Rest of River Cleanup
Date: Wednesday, January 24, 2024 8:36:59 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 ,

Please put me down as supporting Rail vs trucks . Its a no brainer. Most of the tracks in the areas we are talking about have just been

upgraded and the cost of sidings that need to be installed are easily offset by the damage that would be done to roads and towns.

Also once the materials are on the trains , KEEP GOING and take them to already existing disposal sit.

Thank you for your time

Tom Farley . Stockbridge, Ma.

A METAPHOR

Someones dog Relieved themselves by the RIVER on the trail going up to Lauras Tower. The Owner did the right thing and cleaned it up but then left the bag next to a tree.

IT ALWAYS COSTS MORE IN TIME AND MONEY TO DO IT WRONG

This reminds me of the **Rest of the River Towns. From the 40's thru the 1970's** GE decided to relieve itself of its PCB's into the river. Now they say they will clean it up but will leave part of it in LEE at the proposed dump site. It will be Wrapped and Sealed in Butyl Membrane they say, so it wont leak. They Cannot guarantee us this 100%. These things never end well. Future generations will have to clean the dump up at some point. My 31 year old Son when reading this said " THANKS DAD , your generation is leaving a lot for us to clean up ."

You don't cleanup your kitchen by sweeping the dirt into the Living Room.

So when this is all finished GE will have to double its effort and cleanup what they left in Lee.

IT ALWAYS COSTS MORE IN TIME AND MONEY TO DO IT WRONG These things never end well

Stockbridge , Lenox , Sheffield , Great Barrington – This is not a done deal !!

What happens when they get to a hotspot at the Glendale dam or a dam in Great Barrington and decide they have to bury some of that in your town? They have gone back on their word before.

IT ALWAYS COSTS MORE IN TIME AND MONEY TO DO IT WRONG.

GE and THE EPA are doing it wrong and it will cost ALL OF US in the end. A GOOD START WOULD BE FOR THE REST OF THE TOWNS TO TALK WITH THE TOWN OF LEE. As a constituent of Stockbridge I would like our board of Selectmen to do just that. If anyone else feels the same way, let your representatives know now !!!

Thank you ,

TOM Farley

PS-When Bob Jones decided to move to Lee it was a Great Loss to the Town of Stockbridge and a

GREAT GAIN for the town of LEE. To describe Bob - Take your Thesaurus and start with Honorable , Intelligent Trustworthy and go from there. He is asking OUR help with Lee s battle to stop the dump.

WE IGNORE HIM AT OUR PERIL.

PSS- Yes I picked up the bag. It was leaking. I divided it up and took a piece of it to GB, Sheffield and Lenox .Dont worry ,Its wrapped according to EPA standards – some of it is in your backyard. I cant promise you 100% but WHAT CAN GO WRONG ?

FUN FACTS - General Electric annual gross profit for 2022 was \$21.02B,

Rest of the River Cleanup \$576M

576 million is 2.54743% of 22.61100 billion

Pocket Change.

From: [Tracy](#)
To: [R1Housatonic](#)
Subject: Rest of River Plan - Full rewrite required
Date: Friday, January 19, 2024 10:42:52 AM

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

Dear Dean,

I am Tracy Reis, a long time Lenox resident, and parent of a son [REDACTED]

With this public comment submission, I am asking that representatives from R1 of the EPA require a full rewrite of the currently proposed “Rest of River” Transportation and Disposal Plan that was released by Arcadis on behalf of GE on October 31, 2023, and also that the EPA extend the public comment period to allow for robust citizen input, given the critical importance of the matter and near universal local opposition to the plan.

With the following comments, I aim to articulate my resolute support for the integration of rail transport in the “Rest of River” clean-up project. In alignment with formal comment submitted by the five RoR towns and West Stockbridge, I believe rail should be elevated to the status of the primary mode of transport - a prioritization not reflected in the existing plan.

Furthermore, the plan as currently written lacks critical information and offers a misleading and incomplete view of the factors necessary to determine the optimal method of transportation of PCB-contaminated materials during GE’s 13-year “Rest of River” clean-up of the Housatonic River and surrounding floodplains. Because of the following key omissions from the plan, it is impossible to accurately come to the conclusion that trucking should be considered the preferred method of transportation for both on-site and off-site disposal:

The Transportation & Disposal Plan was produced without GE/Arcadis having done the key step of a comprehensive cost-benefit analysis on the use of rail versus trucks. The absence of a detailed and thorough analysis is glaring in this plan, particularly given that there are a number of factors that suggest rail is in fact a superior option for the transport of PCB-contaminated soil and sediment (see below for some examples). This option must be seriously explored so that a truly informed decision about the method of transportation can be made.

The exclusion from the T&D Plan of fundamentally relevant considerations on quality of life impacts further contributes to its incompleteness. The newly submitted

Quality of Life Compliance Plan should have been submitted to the public concurrent with, or better yet as part of, the T&D Plan because information it contains is directly pertinent to how the public understands the consequences of the specifics outlined in the T&D Plan, most notably its reliance on the use of trucks. I will be submitting comments separately for the QOL Compliance Plan, which is extremely troubling to read.

EPA must require GE/Arcadis to do a full revision of their T&D Plan that includes 1) the completion and presentation of a thorough cost-benefit analysis on the use of rail versus truck, rectifying the omissions, assumptions, and misleading rationales of the current plan, and 2) incorporates a revised Quality of Life analysis into a fully revised, rail-reliant transportation plan, rather than having it as a separate submission.

I also implore the EPA to extend the deadline for comment on the existing plan, given how lacking the current proposal is in terms of substance and important details. Because it is so incomplete, and because the Quality of Life Compliance Plan was not submitted concurrently, the deadline of February 1, 2024 for public comment is woefully inadequate.

To expand on the above, a revised Transportation & Disposal Plan should include an honest and complete analysis and investigation of at least the following areas of concern in the comparison on use of trucks versus rail:

Greenhouse emissions (drastically reduced with rail)

Noise pollution (drastically increased with use of trucks)

Safety, including the risk of pedestrian accidents (rail is much safer)

Mental health toll on the community over perceived fears of exposure to volatilized PCBs due to truck traffic, as well as the potential of real exposure

A real feasibility study on the use of rail, which takes into account all of the relevant details, including that:

very similar staging infrastructure and property access rights will be required regardless of use of rail vs trucks

the argument GE/Arcadis makes that rail will lead

to delays is misleading and almost certainly inaccurate. Summer traffic patterns and increases in extreme weather patterns due to climate change throughout all four seasons mean that trucks will certainly experience significant delays—and potentially seek unauthorized routes to avoid traffic jams

There are also many benefits to the use of rail that are not considered, including the long-term investment in local infrastructure and increased regional connectivity, since improvement of the rail system will enable its use, including for passenger trains, long after the conclusion of this cleanup. Furthermore, the cost of infrastructure damage and repair requirements for the roads is inadequately addressed.

GE has a history of acting in GE's interests only. You can stop this as an impartial representative rather than a "shill for GE" which have said you are not. Although both Jackson and John graduated from LMMHS in 2016, you can protect the Lenox schools for future Lenox and choice students.

Sincerely,

Tracy Reis

██████████

Lenox, MA ██████████

From: [REDACTED]
To: [R1Housatonic](#)
Subject: PCB situation
Date: Wednesday, January 31, 2024 10:42:03 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,

The current proposal to use trucks over trains must be reviewed. The trucks that you're suggesting to use will leak contaminated toxic materials along our roadways. I live in section 5B and will be subject to years of these non-sealed trucks rumbling by for close to 10 years.

The quality of life, my home value, and the air quality will all be drastically reduced due to the dredging of the river. More steps need to be taken to force GE to find a safer way to dredge or wait for the science to catch up to clean the river in a safer manner. If this is to go through GE MUST build railroad sidings which will greatly reduce the number of trucks being used. GE has the money to do this, they must be held accountable for their actions and they must do the job properly and with the least amount of harm to the humans and animals that call this place home. GE clearly does not care however we as a community should care and the river cleanup should be halted until they can provide a plan that leaves no possibility of harm to the community they had previously poisoned.

Thanks,
Trevor

From: [Trish Ross](#)
To: [R1Housatonic](#)
Subject: Lee resident opinion
Date: Sunday, January 14, 2024 9:28:30 PM

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

I live in Lee, MA and would like to let you know I am not happy with the situation regarding the pub cleanup in the Berkshires. My main concern is the transporting of the dangerous pcbs. I'm not sure our roads can withstand the trucks that will be traveling over them. Another concern is who is monitoring the whole operation? It can't be GE...for obvious reasons. I'm also not happy about leaving the "not as dangerous" materials in a dump ion our town. The property values of our houses will be negatively affected for sure. Please reconsider this whole thing and let the residents vote on it.
Thank you.
Trish Ross

[Sent from Yahoo Mail for iPad](#)

From: [Verena Smith](#)
To: [R1Housatonic](#)
Subject: Comment on the Transportation Plan
Date: Wednesday, January 31, 2024 11:04:54 PM

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

My name is Verena Smith and I live on [REDACTED] in Lenox.

I hope that GE and the EPA fulfill their responsibility toward the residents of Berkshire County by doing everything in their power to protect them from harmful PCBs.

The Housatonic River Clean Up plan in its current format is NOT what is best for the people of Berkshire County.

I am horrified to think of thousands of trucks filled with contaminated soil driving by my house for the next 12-15 years. Without a doubt, PCBs will be released into the air and every time we step outside or walk our dogs along Walker Street, we will have to worry about PCBs in the air and maybe even on the ground from some leaked materials off the trucks. My main concern of

of course is my son. He is 13 years old and this could have devastating effects on his health and his future.

I am concerned about all the students at LMMHS, Morris Elementary and the Montessori school who will be exposed to airborne PCBs every day with this current plan. They are our future and we have a responsibility to protect them.

The Tri Town Health Department and many others have expressed strong concerns about the proposed trucking plan and suggest a rail alternative. Let's take that a step further and transport all dredged materials out of state by train to approved disposal facilities because the proposed UDF site in Lee is inappropriate as it sits on an aquifer that will be contaminated not if but when the plastic liners of the UDF fail.

GE's plan should have never been signed without public input. The plan as it stands is unacceptable because it will only clean up a small part of the contamination. It will not solve the problem. We must

demand that GE considers and actually tries alternative cleanup methods, some of which already exist.

Please protect our land and our people!

Thank you!

Verena Smith

From: [William Fisher](#)
To: [R1Housatonic](#)
Subject: Transportation of Dredged Materials from the Housatonic River, Lee, MA
Date: Monday, January 29, 2024 1:03:30 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:

We are grievously concerned about the plan proposed by General Electric to transport dredged PCBs from the Housatonic River in Lee by truck or by rail. As many commentators and health officials have realized recently and stated in various fora, GE did not complete an adequate analysis of the rail option. The truck option will clearly bring added stresses to the area in many forms: large trucks traversing local roads over many years, additional pollution from exhaust emanated from these large trucks, increased dangers to pedestrians and other vehicles, effects on traffic and retail establishments, etc.

As life-long visitors to the town of Lee and the Berkshires, and now owners of property in Lee, we implore the EPA to consider all options, and to press GE to better consider and detail the rail option, which will minimize public exposure to the transportation of materials. From the open meeting held on November 28, 2023 at Lee High School, which I attended, it appeared that the local rail authority was willing to assist in designing staging and additional requirements for rail transportation of the materials.

In actuality, we are also extremely concerned about the planned use of the Upland Storage Facility, to be built in Lee (indeed, already begun to be built), where a good deal of the dredged PCB materials will be interred. The facility is near an aquifer and all storage facilities leak over time; it is also near the largest state forest, with hiking and recreation facilities, in Massachusetts, October Mountain State Forest. While we understand that the decision to use this storage facility is not the current topic for public comment, we urge the EPA (and GE) to reconsider the original plan, which was, as we understand it, to remove all dredged materials out of state to an approved storage facility -- and to use rail to do this.

We believe the local towns of the Berkshires and their residents -- those who have been affected by GE's wanton discharge of carcinogenic materials into the Housatonic over decades, and that will be affected by this procedure, whatever form it takes -- have not been sufficiently involved, or invited to be involved, or consulted, over the past several years. Please correct this omission going forward, consider rail for any transportation of the materials that occurs, and, again, consider removing all dredged contaminated materials out of the area completely.

Sincerely,

William T. Fisher, Jr., Ed.D., M.S.W., Professor Emeritus, Social Work, Springfield College, Springfield, MA

and

Lynn T. Gordon, B.S.N., R.N., M.P.A., Community Nurse, Greater Springfield, Holyoke, Chicopee, MA, Area

[REDACTED]
Lee, MA [REDACTED]

Lee, MA
January 31, 2024

Dean Tagliaferro
United States Environmental Protection Agency
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Dear Mr Tagliaferro,

As a Lee resident, I wish to remark on two aspects of PCB transportation relative to the proposed dump site in Lee. The first aspect has to do with the truck routes, the second involves the slurry line.

Truck Routes

The November 28th meeting in Lee presented GE's proposed routes for PCB transportation to and from the dump, mostly focused on transportation by truck.

For the trucks headed out-of-state for disposal there are four fairly direct routes through the town of Lee from the proposed dump site to Westbound Interstate 90 (Massachusetts Turnpike). All four routes have significant drawbacks, none are commendable.

The Main St route intersects 18 pedestrian crosswalks, many with limited sight-lines, before reaching the Turnpike entrance.

High Street is the location of the town's largest Senior Housing facility and joins Park Street at the single most dangerous intersection in Lee.

Greylock Street passes directly in front of Lee's Elementary, Middle, and High School complex and risks collisions with parents driving their children to and from school.

And East Street borders some of Lee's largest populations of children and toddlers.

Deflecting audience resistance to the Main Street route, the GE representatives mentioned using Route 183 instead.

Massachusetts Route 183 southbound starts in Lenox at the intersection of Walker and the Veterans' Memorial Highway (familiarily known as the Route 7 bypass) and proceeds past Lenox Town Hall, down West Street to Tanglewood and then south through Stockbridge and Great Barrington.

Remarkably, Google Maps actually *does* show that once you are on 183 in Lenox the best route to Interstate 90 westbound is past Tanglewood and Kripalu, winding through the switchbacks to Olivia's Overlook and then down into West Stockbridge before joining the Interstate over the border in New York State at Route 22.

The GE maps provided at the meeting improve slightly on Google's suggested route by instead continuing on Rt 183 to Rt 102 at the Berkshire Botanical Garden just north of the Norman Rockwell Museum and thence westward into West Stockbridge.

There is a pressing reason why EPA/GE should want to altogether eliminate Route 183 outbound. West Street drops down to Tanglewood in the steepest continuous downhill in Lenox. Midway down that hill is Morris Elementary School with school traffic stopped waiting to enter the driveway.

It should not take much mental effort to imagine the possibility of a PCB-laden truck losing its brakes and plowing into the cars waiting to turn.

The November 28 meeting was held in Lee. Although they were invited there was very little audience participation from other towns.

It would really be helpful if EPA/GE would take positive steps to present its route plans to an audience of every Berkshire town that the proposed routes pass through. The feedback would certainly steer those routes away from our downtowns; away from populations of children; away from our schools; and away from our cultural sites.

Slurry Line

At the November 28 meeting mention was also made of the proposed slurry line that would transport dredged river material from the area between New Lenox Road and Woods Pond. Considerable doubt was expressed by GE that the slurry line could actually work; in which case trucks would be used instead.

Slurry lines are notorious for requiring enormous amounts of water – far in excess of the amount contained in the dredged mud.

Anyone familiar with the Housatonic knows that the river often slows to a trickle in summer months. And anyone familiar with the proposed dump knows that it is located like a red bulls-eye on top of the largest aquifer in Berkshire County.

Can the EPA guarantee that GE will not be allowed to tap that aquifer for slurry water? Sixty years ago, Quabbin Reservoir was so depleted that a drought emergency was enforced in Boston. Given the uncertain models of global warming, we have no assurance that the droughts now devastating the Southwest will not visit the Northeast later this century.

Worldwide, most mining operations disdain slurries, preferring to use conveyor belts or narrow-gauge mining carts. To date, discussion of transportation options for the Housatonic PCBs inevitably snaps back to trucks.

The information on EPA's website regarding other PCB transportation alternatives is piecemeal, scattered, buried, or simply non-existent. It would be useful in any further presentations to have a rigorous cost-benefit tradeoff of all potential modalities both in spreadsheets and as narratives.

Respectfully,

A handwritten signature in black ink, appearing to read "William D Mathews". The signature is fluid and cursive, with a large initial "W" and "M".

William D Mathews