

**Public Input on General Electric's
Revised Quality of Life Compliance Plan, dated
November 22, 2024**

November 2024 - February 2025

Public Input ended on February 10, 2025



CITY OF PITTSFIELD

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

MEMORANDUM

To: EPA Staff
From: James McGrath, Park, Open Space, and Natural Resource Program Manager
Date: February 7, 2025
Subject: *Comments on Revised GE-Pittsfield/Housatonic River Site Quality of Life Compliance Plan*

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

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

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

The plan is of particular interest and value to the community since its focus is on the monitoring and control of quality-of-life variables of concern and represents an opportunity for the community to take an active role in forthcoming communication and monitoring activities. In general, we acknowledge that the *2024 Revised Quality of Life Compliance Plan* fulfills the requirements set forth in the Statement of Work and Revised Final Permit. We also acknowledge and appreciate the detail around project coordination as outlined in Section 3 –

Coordination with Local Governments. The City stands ready to play an active and participatory role with GE in efforts around planning, design, and construction phases.

Based on experiences observed during the first 1.5 miles of clean up, substantial remediation activities such as those to be accomplished for the Rest of River can cause community fatigue and concern as the project timeline extends. One of the methods to help circumvent the issues that can arise from this condition is to foster regular community communication and dialogue with GE, to include EPA.

To this end, the City has a keen interest in establishing a *Rest of River community group* that would meet on a quarterly basis with GE (and others as needed). The focus of the group would be to assist with the compliance of Rest of River activities quality-of-life goals complaints and concerns. The small, representative group would meet with the project community liaison and the city's Department of Community Development. The current Ward 4 city councilor has strongly endorsed this idea. The city looks forward to seeing GE represented at these important, regular meetings. This ongoing "open communication" format will help the community be engaged by having GE (and others as needed) listen to their concerns. Furthermore, the outcome would benefit GE by obtaining real-time community feedback and observations of any remediation activity concerns. This community coordination will demonstrate GE's continued commitment to accomplish its goals and maintain proactive communication.

Though we understand no hydraulic dredging will be occurring in Reach 5A, there will be mechanical dredging operations that occurs and these operations can be performed during daytime hours (7am - 9pm). The *Quality of Life* plan requires that GE minimize loud overnight work to the extent practicable. We would ask that overnight work take place only as absolutely necessary and that the city will also be informed. In these instances, we understand that GE must obtain EPA prior approval, except in the case of emergencies. If necessary, GE must also take appropriate measures to mitigate sound from impacting local households and residents with control measures such as, but not limited to, sound-attenuating walls or barriers.

Finally, we appreciate the thorough detail provided in the plan around maintaining roadway infrastructure through pre and post-construction baseline assessment work. The City's Commissioner of Public Services will be widely available to work with GE and its contractors at every step of the construction project.

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

Sincerely,

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

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



TOWN OF LEE
32 Main Street, Lee, MA 01238
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R. Christopher Brittain,
Town Administrator

February 10, 2025

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

Dear Mr. Tagliaferro:

PREFACE: In submitting the comments below, we remind the Environmental Protection Agency, the General Electric Corporation (GE), and the courts, both state and federal, that the Town of Lee is extremely dissatisfied with the proposed “remedy” for restoration of the Housatonic River. While EPA embraces “risk assessment” to justify moving forward with this plan, it is, in fact, no remedy at all for the Town of Lee. No PCBs are being neutralized or destroyed. The PCBs are simply to be redistributed or buried less than a mile from the river in an area of critical environmental concern and above a major aquifer. They remain a danger to the health and safety of the residents of the river corridor, the environment, and to future generations. Reduction of risk is really reduction of cost to GE, penalizing this and future generations for GE’s reckless policies over decades. The use of the term “environmental” and “economic justice” ring hollow and will haunt all of us for years to come.

Following, please find comments from the Town of Lee regarding the following GE documents:

- Revised Quality of Life Compliance Plan
- Phase IB Cultural Resources Survey Work Plan for Reach 6

Revised Quality of Life Compliance Plan

1. The 2024 Revised Quality of Life Compliance Plan focuses on several issues, including air quality, noise, odor, and lighting. TASC’s (EPA Technical Assistance for Communities) previous comments on the 2023 Quality of Life Compliance Plan noted that there may be other areas of interest and concern to surrounding communities, including aesthetics or visible impacts on the natural environment. Disturbances in the Housatonic River from remedial action activities are likely to have visible effects on water quality, especially turbidity, color, and sheen. In addition, occasional fish kills, destruction of other forms of aquatic life, and the removal of terrestrial vegetation during riverbank soil and upland soil remedial actions are also likely to have visible effects. These impacts

can be disturbing to surrounding communities, and it is important that GE anticipate these impacts and provide these communities with assurances about the overall improvements to be achieved by the remedial action. TASC recommends that GE allow surrounding communities to express concerns and/or record observations about visible impacts as part of the quality-of-life community coordination public input process so that GE can take steps to address significant disturbances.

The Town of Lee requests that EPA create a process whereby the community can report to GE visible disturbances during the Rest of River remedial action process.

2. Community health and safety is a priority in the 2024 Revised Quality of Life Compliance Plan. There are several more safety considerations that could be addressed in the plan. For instance, light disturbances are evaluated strictly from the perspective of their nuisance to surrounding residents. Powerful light can also be distracting to motorists and cause traffic safety concerns. Loud construction noises are a similar concern. Sudden loud noises can alarm motorists and cause traffic disturbances. The plan should discuss how intense lights and noises will be controlled to ensure traffic safety.

The Town of Lee requests that the 2024 Revised Quality of Life Compliance Plan be amended to address the impact of intense light and noise on traffic safety.

3. In line with Comment #3, it is important to clarify in the 2024 Revised Quality of Life Compliance Plan whether monitoring alarms used to indicate when monitored parameter concentrations exceed the notification level will produce a disturbing noise. The community may be sensitive to audible monitoring alarms and may perceive construction noise (such as equipment backup alarms) as the equivalent of a monitoring alarm. Furthermore, if monitoring alarms are audible, GE should post notices so the community can understand that these alarms are not cause for immediate concern and instead are part of the continuous monitoring process. The 2024 Revised Quality of Life Compliance Plan should state whether the monitoring alarms will be audible and, if so, whether they will be distinguishable from ongoing construction noise.

The Town of Lee asks EPA whether the monitoring alarms to detect site construction-related releases of particulate matter will be audible and whether GE can post notices explaining these alarms so that the community does not misinterpret them.

4. TASC previously commented on concerns about monitoring analyses that rely on time-weighted averaging procedures. Single-event or infrequently occurring disturbances created by air quality, odor, noise and light are difficult to capture through monitoring if analysis results are averaged over time. The process of

averaging dilutes the result from a single event, giving a false impression that the event is not harmful. For instance, a single burst of noise can cause harm and should therefore be acknowledged.

The Town of Lee requests that issues related to single events be addressed through communication with GE to ensure these events are controlled in the future.

Phase 1B Cultural Resources Survey Work Plan for Reach 6

1. The Phase 1B Cultural Resources Survey Work Plan generally acknowledges several closely located support area features associated with the Rest of River Transportation and Disposal Plan and the Reach 6 Remedial Design/Remedial Action Work Plan for Reach 6. They include a potential rail spur to the west of Woods Pond (Figure 5-3, pdf page 140), the hydraulic pipeline linking Reach 6 and transportation support areas to the Upland Disposal Facility, and the Reach 6 Woods Pond shoreline support facility (Figure 5-3, pdf page 140), which will be used for consolidation and transport of hydraulic wastes. Other available Reach 6 documents define the hydraulic pipeline location more clearly (Figures 6-1 and 6-2 of the Baseline Restoration Assessment, pdf pages 154 and 155, AECOM, 2024).

The Phase 1B Cultural Resources Survey Work Plan for Reach 6 states that the actual location of these features has yet to be finalized and any changes would result in more inventory and evaluation of cultural resources. The surrounding communities have expressed concern that the hydraulic pipeline in particular may impact areas with cultural resources and would like GE to acknowledge that this area should receive close attention. It may be appropriate for the survey to include shovel test pits in targeted locations along the proposed pipeline pathway.

The Town of Lee requests that the Phase 1B cultural resource survey efforts for Reach 6 focus on the more specific locations for support areas identified in other documents.

2. Section 2.2 of the Phase 1B Cultural Resource Survey Work Plan for Reach 6 (beginning on pdf page 15) delineates proposed areas of potential effects (APEs). The APEs appear to appropriately encompass all areas proposed for remedial activity as defined in GE's Conceptual Remedial Design/Remedial Action Work Plan for Reach 6. One APE is the shoreline support facility area (Table 3-1, pdf page 23), where proposed aquatic field investigations (Section 3.1.1, pdf page 19) and terrestrial field investigations (Section 3.1.2, pdf page 22) will involve shoreline shovel test pits confined to this area. However, as the shoreline will experience significant physical disturbance from remediation

activities to achieve the performance standard for shoreline slopes (2.e. Woods Pond (Reach 6)(1)(a), pdf page 32 of the Revised Final Permit), it may be prudent to gather additional shoreline shovel test pit profiles in a consistent spacing around the perimeter of the pond. Moreover, as wave action may have transported and deposited artifacts of interest over the years, it may be useful to dig deeper pits on the shoreline to determine if any depositing has occurred.

The Town of Lee requests that field investigations include a more robust focus on the shoreline around the entire Woods Pond perimeter as this area will be substantially impacted by remedial activities and may contain cultural resource deposits.

3. The Reach 6 area includes one potential vernal pool (6-VP-1) in the northeast area, close to the eastern shore of Woods Pond (Figure 1-3 of the Baseline Restoration Assessment Report, pdf page 146). The Phase 1B Cultural Resources Survey Work Plan for Reach 6 does not propose any Phase 1B survey approach for this feature, even though it would occur in an area with “high terrestrial sensitivity” for cultural resources (Figure 4, pdf page 20 of the Phase 1B Cultural Resource Assessment Work Plan for Reach 6). The absence of information pertaining to this vernal pool is particularly concerning since the Reach 5A Phase 1B Cultural Resource Assessment Work Plan indicated (and may set a precedent) that vernal pools and other inundated/saturated areas are to be excluded from forthcoming Phase 1B surveys.

The Town of Lee asks EPA whether the document should be amended to include a description of the proposed cultural resource survey methods to be used for the vernal pool in Reach 6.

4. The process of hydraulically transferring slurry may require the sieving of sediment to eliminate large obstructions that can encumber pipeline transport. Sieving may reveal cultural artifacts of interest and historic value to the community. The eventual disposition of these resources and may be a resource for display that demonstrates the proactive treatment of cultural resources during the Rest of River remedial action process.

The Town of Lee requests visible monitoring of sieved sediments extracted during Rest of River remediation to identify possible cultural artifacts.

Sincerely,



R. Christopher Brittain
Town Administrator

cc:

His Excellency Donald J. Trump, 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 Leigh Davis, State Representative, 3rd Berkshire

Select Board, Town of Lee

PCB Advisory Board, Town of Lee



TOWN OF LENOX
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Jay R. Green, J.D.
Town Manager

February 3, 2025

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

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

RE: Town of Lenox Comments: Revised Quality of Life Compliance Plan, November 2024

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 in development and planning. As such, it requires the full focus of the Town's attention and that of EPA Region 1.

To that end, the Town of Lenox has engaged Weston & Sampson as an independent third party for the purpose of evaluating various aspects of the Rest of River clean-up. Weston & Sampson has aided the Town in the preparation of this letter which provides comments on the Revised Quality of Life Compliance Plan (Anchor QEA, November 2024)

The Revised Quality of Life (QOL) Compliance Plan discusses 1) plans for coordination with local governments during planning and implementation of the rest of river remediation, 2) communication with the local communities concerning potential impacts to recreational activities and road usage, 3) community coordination and education during remediation, and 4) Quality of Life Standards developed for the project.

Coordination with Local Government

Coordination with local governments is discussed in Section 3 of the QOL Compliance Plan but offers only a description of the types of activities that will be performed and reference is made to further discussion of this coordination in other sections of the report as follows:

- Section 5 discusses impacts on recreational activities during remediation and possible enhancements following remediation. The Section makes reference to Remedial Design/Remedial Action (RD/RA) Work Plans that will be developed for each of the reach units to be remediated. Comments on the Reach 6 RA/RD are due on the same day as those for the QOL Compliance Plan and are provided under a separate letter, but it is noted here that the Reach 6 RA/RD Work Plan only mentions coordination with local governments without providing specifics as to the scheduling or form of any meetings.



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Jay R. Green, J.D.
Town Manager

Comment: Lenox requests that more specifics on the timing and form of meetings and coordination with local governments be provided before the Reach 6 RD/RA Work Plan is made final so that they may provide comment and that future RD/RA Work Plans include the same information. Lenox borders one side of Reach 6 and the remedial activities are of particular importance to our community.

- Section 6 discusses potential Road Usage during remediation and how the condition of roadways to be used for transport of sediments will be assessed prior to, during, and following the completion of remediation activities. Reference is again made to more specifics being provided in the Final RD/RA Work Plans to be developed for each of the Reach Units.

Comment: Lenox requests that more specifics on the timing and form of meetings and coordination with local governments be provided before the Final RD/RA Work Plans are developed so that they may provide comment and participate more actively in the development of communication plans concerning road usage. Transport of sediments to the UDF via road is a major concern for our community.

- Section 7 discusses the 1) designation of a community liaison, 2) creation of a project website, 3) hosting of public meetings by EPA, 4) distribution of project fact sheets, 4) creation of email distribution lists for project communications, 5) coordination with affected residents and landowners, and 6) creation of a complaint management system.

Comment: Lenox appreciates that GE is including these activities in their planning for the remediation. However, without more detail as to implementation, it is difficult to provide comment. Lenox requests that more detail be provided so that they may provide comment before the QOL Compliance Plan is made final.

Public Communications and Community Coordination

As described above, a description of programs deemed necessary for public communications and community coordination is provided. However, there is little detail as to the final form and implementation of these programs and it is difficult to provide comment other than to request additional detail before the QOL Compliance Plan is made final.

Quality of Life Standards

Quality of Life standards have been developed for Air Quality, Noise, Odor, and Lighting. Noise and Lighting standards have been developed to be compliant with local ordinances and no additional comment is provided for those. It is acknowledged that developing standards for Odors is difficult and that the proposed standard of “uncomfortable project-related odors,” as identified during the performance of the work is acceptable. There is discussion of odor complaints made by the public in this section and discussion of methods for the public to provide complaints via phone, email, or project website in another.

Comment: Lenox appreciates that GE is including these methods of receiving complaints from the public in their planning for the remediation. However, without more detail as to implementation, it is difficult to provide comment. Lenox requests that more detail be provided so that they may provide comment before the QOL Compliance Plan is made final.



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Town Manager

As to Air Quality, standards have been established based upon those used for previous projects and have been reviewed by EPA and are considered to be acceptable. However, this is a topic that is of particular concern to the residents of Lenox. Monitoring will be performed and reference is made to the Ambient Air Monitoring Program (AAMP) for this project but the AAMP is not attached to the QOL Compliance Plan.

The AAMP is attached to the Revised Updated Project Operations Plan and comments on that are due February 10, 2025. Lenox will provide comment on the means and methods to be used to evaluate compliance with the proposed Air Quality standards at that time.

These comments are intended to call EPA's attention to issues important to Lenox. We look forward to seeing progress toward our concerns in these areas.

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

Sincerely,

Jay R. Green, J.D.

Citizens for PCB Removal Comments for the submittals due on February 10, 2025:

Rest of River (GECD850) Revised Quality of Life Compliance Plan

Rest of River (GECD850) Revised Updated Project Operations Plan

Rest of River (GECD850) Upland Disposal Facility Revised Final Design Plan

Rest of River (GECD850) Upland Disposal Facility Revised Operation, Monitoring, and Maintenance Plan

Rest of River (GECDSS0) Proposed Dewatering and Water Treatment Systems for Upland Disposal Facility Area: Addenda to Upland Disposal Facility Revised Final Design Plan and Upland Disposal Facility Revised Operation, Monitoring, and Maintenance Plan

EPA and GE are trying to pull the wool over our eyes. Saying that hydraulic dredging will solve all the issues that have been raised concerning transportation and removal of contaminated PCB sediment from Rest of River is only presented to make people believe that this is the ultimate solution. Having the December 4 presentation at Taconic High School where we were told of the EPA decision to allow GE to utilize hydraulic dredging as the primary sediment removal process did not give concerned stakeholders adequate time to review the 424 page document submitted to EPA by GE where it was one of four possible selections.

Additionally, EPA and GE have consistently described Hydraulic dredging as "IF FEASIBLE". If/when this method should become "NOT FEASIBLE", the fall back is truck transport on our state, municipal and private roads.

Hydraulic dredging has many issues to discuss when being considered for sediment removal from a river system. It should be noted that hydraulic dredging was considered but ruled out as a possible remediation process of the Hudson River which was also contaminated by with PCBs by GE. Many of the same issues of the Hudson should also be determined when considering this process for the Housatonic River. Most notably is it is not possible to pre-determine what lies in the sediment of the river that is not visible from a cursory look at the river. Sticks, rocks and other large debris can cause havoc on the dredging equipment, causing breakdown of the pumping equipment, expensive repairs and delays to the removal process. Ideally silt-like sediment with no debris would make this process more desirable. Another issue to consider is the length of the dredge pipes for pumping sediment. Due to the distance being considered, additional pumps will be required to transport the sediment. Each additional pump will result in sound pollution in the neighborhoods where each pump is located. These devices are extremely noisy and will emit untold levels of diesel or gasoline exhaust and corresponding petrochemical particulate matter. Hydraulic dredging can also be more effective when used for horizontal pumping, but that will not be the case for the tubes that will be used to bring sediment to the UDF area where the pumps will be required to pump uphill for considerable lengths. The more vertical pumping required, the larger and noisier pumps that will be required as well as the increased number of pumps for these locations. This noise will affect the Quality of Life for those residents and wildlife within earshot of these pumps and we know how sound travels. Additionally much of the work will occur during summer months when windows are open to our homes. *There has*

also been mentioned that hydraulic dredging may occur outside of normal daylight hours and even continue on a 24-hour basis. We all know that nighttime noises travel longer distances as they are not interrupted by the drone of daily sound pollution. As an example, I rarely hear train whistles during the day but often hear the whistles from miles away at 3 or 4 am.

CPR is very concerned that shortcuts may be made to the dewatering process, thus returning overly PCB contaminated water back to the river system. Relying on these geotextile tubes to filter the river water adequately without proper testing of the filtered water prior to its being returned to the river is irresponsible.

Also due to the amount of sediment that will be dredged, the overall level of Woods Pond will be lowered since there will not be restoration or “capping” performed for several years. This will also affect the flow of the river below Woods Pond Dam. There is also NO discussion of the continuing possibility of drought in the Berkshires that has existed in the past few years. Will work be postponed should there be lower levels of river flow due to drought? And what about erosion, should there be a unique increased rain event that could result in serious flooding?

There is one last big issue of hydraulic dredging that must be considered and should concern anyone in the towns along the river. A relatively large amount of water (~90% by weight) is sucked with the sediment to create the slurry. Using that amount of water from the normal river flow will reduce that flow significantly downstream in the river from the pumps. If you reduce the river flow, it will cause more of the river banks to be exposed to the air where it will dry out and be subject to increased dust and airborne PCB contamination to our neighborhoods and onto higher air currents that can travel vast distances to impact inhalation and terrestrial endpoints in areas far from the immediate river watershed. The lower flow will occur all along the river below where the dredging will occur from day one of this process. This issue was not considered during previous presentations by GE or EPA. The new TAG Advisor for HRI has told us that these drying sediments actually result in more PCB airborne issues than normally experienced in a river system. It should also be stated that hydraulic dredging stirs up some contaminated sediment that will be released in the river and will also flow downstream where less water in the river will result in more air drying of those sediments and more airborne PCB dust being blown into our homes, schools, workplaces, etc. *Relying on air monitoring of “work areas” alone is unacceptable as there should be monitors all along the river corridor as any work continues, and especially where the actual river flow may be affected. Additionally, there is no mention of the discharge of the water from the dredging. Will it be tested for PCB contamination before discharge? How will it be discharged and where? Will it be placed back in the river below the UDF location and will the amount of discharge cause erosion of that portion of the river? Many more questions must be answered before this process begins.*

Lastly, this decision was as a result of so many citizens and towns being unhappy with the truck transport of PCB contaminated sediments through our residential roads. That is why so much dredging is proposed to reduce that truck traffic. As with all decisions for Rest of River they are subject to change, so I believe it is a smoke screen at this time to stop the residents and towns from objecting to the truck traffic disruptions. What is still not known and for some reason not required to be presented by GE or EPA is how the removed sediment will be replaced in the river, where clean fill will be transported from, or how many trucks will still need to travel through our towns. Because

these trucks will not contain PCB sediment from the river, no one needs to address any of these issues. Yet there will be considerable truck traffic through our towns and neighborhoods and because they will contain "clean fill" there will be no controls over dust caused by these trucks. We should be informed of what the plans will be for all this traffic. *As with all submittals and agreements (whether called FINAL or not) because they are subject to change, it is our belief that hydraulic dredging will ultimately fail and the sediment will be subject to truck or train transport.*

If only one positive thing that has occurred with Rest of River issues in a long time, the EPA Challenge for Alternative Technologies has received a great response with 98 submissions from around the world. As a result, EPA has extended the evaluation deadline to February, 2025. Hopefully one of these technologies will allow a reduction in the amount of PCB contamination levels to be placed in the UDF or possibly even eliminate the need of a toxic dump the size of 10 football fields and close to 100 feet thick. *A solid review of these proposals and options should be considered before one shovelful of contamination is placed in the UDF. We must be beyond the issue of cost as the primary concern should be the ultimate protection of our citizen's health and future.* We continue to have hope that we will have a fishable and swimmable river without the need for any dumps in our area.

CPR also believes that the issue of train transport has still not been completely examined and can be increased for sediment removal. Once a train car has been loaded, it should not be unloaded to transfer to truck transport to the UDF. That sediment should go out of our county.

Following this "comment" period, there are at least 9 (NINE) new submittals due for comment in the next three weeks. The GE attorneys and engineering firm has been quite busy inundating the citizen stakeholders with a tremendous amount of work. Because these new submittals are mostly considered revised editions of previously submittals, GE SHOULD BE REQUIRED TO HIGHLIGHT THE MODIFICATIONS FROM THE PREVIOUS SUBMITTALS THROUGH A SUMMARY PARAGRAPH/SECTION OF THE NEW DOCUMENT. Searching through these thousands of pages for the revisions is very time-consuming for us and a ruse to confuse the public. It would be simple for the editors to make these revisions.

CPR knows that we are on the correct side of the science that says ALL the PCB contamination should be removed from our river and communities and not placed in a local dump. It may take years before our side of the argument is proven to be right. The dump should, at the very least, have a rider that says it will be reversed and the contaminated fill in it be remediated in the future as the technology warrants such remediation. Similar activities are occurring across the country at former landfills that have proven to be problematic.

Charles Cianfarini

Interim Executive Director

Citizens for PCB Removal

Comment #	Citation	Report Text	Comment	Discussion for HRI
1	Sec 1.3, p. 4	"A central focus of this Revised QOL Compliance Plan is defining GE's proposed standards for air quality, noise, odor, and lighting to be implemented during the ROR Remedial Action. The final QOL standards will be incorporated into the remedial design and used to establish routine control measures, monitor the impacts of the remedial activities, and specify contingency response actions where necessary. An adaptive management approach will be implemented in achieving the QOL standards, such that modifications to control measures, remedial construction activities, and contingency response actions may be identified as the project proceeds, as described in GE's Revised Adaptive Management Plan submitted on June 24, 2024 (Anchor QEA 2024) and approved by EPA on November 1, 2024."	The use of adaptive management in achieving the QOL standards, while useful, will require EPA to quickly review project monitoring data in order to allow for any needed modifications to project operations to be implemented quickly, to avoid any extended violations of the QOL standards. Will EPA be reviewing the QOL monitoring data on a daily basis and taking corrective actions immediately should the QOL monitoring data show exceedances?	The constant need for EPA's attention to this issue is a critical element to protecting the public during remedial action.
2	Sec 3, p. 7	"Periodic meetings and conference calls among GE, EPA, and the local municipalities listed above will be scheduled to discuss the status of and updates related to the remediation activities as they pertain to those communities and to discuss issues that may affect the municipalities' constituencies, as well as other pertinent project-related issues. GE and EPA will coordinate with the other entities to schedule such meetings and conference calls."	The "periodic" meetings and conference calls described here are an important element of the plan. EPA should have GE commit to weekly meetings/calls with local officials so that they can be kept current on monitoring data as well as project operations and progress. While this may seem excessive at first glance, a commitment to frequent communications with local officials will ensure that project information related to QOL standard compliance and project operations is passed along in a timely manner and be useful to the local officials.	The local officials will end up being points of contact for their constituents, particularly for QOL issues as they arise.
3	Sec 3, p. 7	"Topic-specific meetings with relevant local governments (and the public as appropriate) are anticipated at various phases of the remediation. For example, GE previously participated in meetings with local governments during development of the Revised T&D Plan submitted to EPA on October 15, 2024, and will participate in a public meeting scheduled for December 4, 2024, regarding that revised plan. Additional meetings are anticipated during development of future RU-specific RD/RA work plans. In addition, during the construction phase, GE anticipates that meetings will be held with EPA and local government officials to discuss the schedule and progress of the work and to discuss issues affecting implementation and other key issues."	This paragraph describes meetings with local officials and the public during design and implementation of the remedy. There is no certainty expressed in this statement, however, with the need for the document to be specific. Suggest this rewrite: "Topic-specific meetings with relevant local governments (and the public as appropriate) will be held at various phases of the remediation. For example, GE previously participated in meetings with local governments during development of the Revised T&D Plan submitted to EPA on October 15, 2024, and will participate in a public meeting scheduled for December 4, 2024, regarding that revised plan. Additional meetings will be held during development of future RU-specific RD/RA work plans. In addition, during the construction phase, meetings will be held with EPA and local government officials to discuss the schedule and progress of the work and to discuss issues affecting implementation and other key issues."	The text in the report does not require GE to do anything other than "anticipate".
4	Sec. 4.3.3, p. 12	Air monitoring will be conducted at representative locations near the closest receptor to the work activities or between the active work areas and the closest receptor. The compliance point for attainment of the air standards will be at the closest receptor, which will vary based on the location of the active work. However, monitoring data collected closer to the source that meet the standards will be considered to show attainment.	This monitoring and data analysis approach to QOL air monitoring should be revised. The nearest receptor may or may not be down wind from the potential sources of PCB/dust to air. A compliant sample at the nearest receptor if not downwind, should not be used to establish compliance with standards.	Analysis of air monitoring results needs to account for wind direction.
5	Sec. 4.3.3, p. 13	"PM10 monitoring will be conducted daily for a minimum of 10 hours when construction (including sediment removal) is ongoing and throughout the duration of daily construction activities. If construction activities are ongoing for longer than 10 hours, particulate monitoring will continue until daily activities are complete. For particulate monitoring during sediment removal activities conducted under wet conditions (e.g., wet excavation, hydraulic dredging), if the results of such monitoring during the initial two weeks of that activity indicate PM10 levels are below the Notification Level, GE will propose to EPA that the PM10 monitoring frequency be reduced or terminated during the remainder of that activity."	The PM10 (dust) monitoring program should continue whenever there is a potential for dust to be generated. EPA should be cautious when evaluating any GE proposal to suspend or terminate monitoring, and approving such proposals should be limited in time and scope.	HRI will need to pay attention to this issue; GE will press EPA to suspend monitoring whenever possible. No broad suspensions of monitoring by EPA should be tolerated unless there is a very good reason for not doing the monitoring.
6	Sec. 4.3.3, p. 13	"As described in Section 2.4 of the revised AAMP, baseline ambient air monitoring for PCBs will be conducted to assess conditions prior to active use of the UDF or UDF support area and prior to implementation of remediation activities in each ROR RU. Baseline monitoring locations will focus on areas with the highest density and sensitivity of receptors, such as residential neighborhoods or heavily used recreational areas, provided that such areas are located within or are representative of the area(s) where remediation will be conducted. Sampling events for PCBs at baseline monitoring locations will be 24 hours in duration. The baseline monitoring data will be used, where appropriate, during the ROR Remedial Action to provide context for data response and investigation in the event of PCB Notification or Action Level exceedances. Baseline data will serve as a line of evidence to evaluate whether airborne PCBs detected through the ROR Remedial Action monitoring program are due to response activities or from other activities in the area."	Baseline air monitoring is an important element of the monitoring plan. However, the use of baseline monitoring PCB detections should not impact the enforcement of the QOL standards for PCB in air. The project must be performed in a manner which is designed and implemented such that the QOL standards are not exceeded during the project. For example, if 20 ng/cubic meter of PCB are detected at a location during baseline monitoring, then the standards does not become 120 ng/cubic meter. The standard is the standard, and project operations need to be managed to achieve the standards.	This issue is an important one. It does not matter if GE's PCBs get in to air during the project as a result of project operations or as a result of the widespread PCB contamination of the Housatonic River valley by GE. A standard has been set, and GE should be compelled to comply with the standard.
7	Sec. 4.3.3, p. 14	"During construction, PCB monitoring will initially be performed in the vicinity of potential sources of PCB emissions for two sequential 24-hour periods (i.e., two back-to-back daily events) at the start of each new type of construction activity in each construction season to confirm that representative airborne concentrations for PCBs do not exceed the designated standards. The PCB monitoring will be performed using continuous 24-hour air samplers, as described in Appendix G to the latest revised FSP/QAPP. The type of PCB air samplers to be used (i.e., high-volume samplers or low-volume samplers) will be specified in the Final RD/RA Work Plan or SIP for each RU or, for the UDF area, in the Revised UDF OMM Plan. In general, high-volume sampling will be performed at stationary locations with electrical power, and low-volume samplers (which are battery powered) will be used for the mobile locations in the vicinity of active remediation activities or at fixed locations where no power source is available. If the initial PCB monitoring indicates that air PCB levels are acceptable, one 24-hour monitoring event will then be conducted weekly for each area of active construction for the duration of that construction activity. In addition, monitoring will be reinstated when a new type of remediation activity occurs in an area."	The use of only 2 sampling events at the start of "each new type of construction activity in each construction season" to decide if monitoring is required for the rest of the season is insufficient. Changes in weather (wind speed and direction, rain vs. sun, degree of cloud cover) along with changes in source conditions (PCB concentrations in sediment, type of equipment being used, where the operations are occurring) all factor into potential significant changes in airborne PCB and dust concentrations. It is unreasonable to allow GE to avoid air monitoring to protect the public. EPA should direct GE to perform routine air monitoring regardless of whether initial monitoring results show compliance with standards.	This is also an important issue. GE will look for every excuse to not do air monitoring, to both avoid monitoring costs and to avoid gathering data which could be used to make GE change operations to protect the public.
8	Sec. 4.3.3, p. 14	"The air quality monitoring program is described further in the revised AAMP included in the revised POP. If the measured PM10 or airborne PCB concentrations exceed the Notification or Action Level described in Section 4.3.1, GE will take the actions described in the following subsections, as applicable. In the event of an air quality complaint, GE will follow the process specified for the complaint management program in Section 7.2.3 of this Revised QOL Compliance Plan. Specifically, in such a case, GE will investigate whether the complaint is related to the project. If so, GE will review the monitoring data to determine whether the Notification or Action Level has been exceeded and, if so, will conduct the appropriate actions described in the following subsections. If there was no exceedance of those levels, GE will evaluate potential mitigation measures to address the complaint, and if mitigation measures are possible and GE and EPA agree, GE will implement such measures."	Here, and in other locations in this document, GE's text states that measures will be implemented only if GE agrees with EPA that they are needed. This is unacceptable. GE should not hold veto power over EPA's direction to implement needed mitigation measures under the QOL program. Instead, the actions needed to achieve QOL compliance should be required, not up to GE.	GE's text here says that the company only has to implement mitigation measures if they agree with EPA. This is unacceptable and should be revised.
9	Sec. 4.3.3.1, p. 15	"For PCBs, any exceedance of the Notification Level will be reported to EPA as soon as practicable, but no later than 24 hours after receipt of the data showing the exceedance."	GE should be required to notify local officials of exceedances of the PCB air standard, with the same "as soon as practicable, but no later than 24 hours" requirement.	
10	Sec. 4.3.3.3, p. 16	"In addition to the results of air monitoring, other observations of conditions that could cause project-related QOL issues or complaints or result in an exceedance of the QOL standards (e.g., exceedances of the visible dust standard due to remediation activities) will trigger an evaluation of whether additional mitigation measures or BMPs, such as those listed in Section 4.3.4, should be implemented to address such observations and mitigate the potential for exceedances of QOL standards."	The process and considerations for the evaluation proposed in this passage should be defined. What would cause, or not cause, BMPs to be implemented? This evaluation should also be documented in detail, and available to the public as soon as practicable.	Implementation of BMPs to address releases should be done as needed, without protracted evaluations. These evaluations need to be public.
11	Sec. 4.3.4, p. 17	"Where prior EPA approval of additional mitigation measures is not required, GE will consult with EPA (if there is time to do so) prior to implementing such additional response actions or additional mitigation measures. If time-critical actions are needed, GE will consult with EPA as soon as practicable after implementing such actions."	This consultation between GE and EPA after implementing BMPs should be immediate, and include provision of all related monitoring data to both EPA and the public.	

12	Sec. 4.4.3, p. 20	<p>"If the initial monitoring indicates that noise levels are acceptable, subsequent monitoring will occur as follows: (1) monthly for each type of construction activity to verify noise levels; (2) when a new remediation activity, equipment, or reduced distance to receptors has the potential to increase noise levels; (3) if work hours are extended to the nighttime period (i.e., between 9:00 p.m. and 7:00 a.m.); and (4) in response to noise complaints. Like the initial monitoring, this subsequent monitoring will be continuous during hours of operation so that one-hour averages can be computed across the entire construction day."</p>	<p>As with Comment #7 above, noise monitoring should not be suspended simply because initial monitoring is within standards. EPA must direct GE to perform the monitoring necessary to ensure compliance with the noise standards. Changes in equipment used, wind speeds and directions, and local geography all impact the ability of the project to continually achieve the noise standards. EPA should direct that routine noise monitoring be performed even if initial monitoring is within standards.</p>
13	Sec. 4.5.2, p. 24	<p>"If a project-related odor is determined to be uncomfortable or a nuisance, GE will propose and implement mitigation measures as appropriate to reduce or eliminate the source of the odor."</p>	<p>The determination of whether or not a project-related odor is uncomfortable or a nuisance should not be left up to GE. EPA should respond promptly to odor complaints and determine the degree to which the odor is uncomfortable or a nuisance, and promptly direct GE to implement control measures as determined appropriate by EPA.</p>
14	Sec. 4.6.4, p. 27	<p>"If mitigation measures are deemed necessary to address a lighting complaint, GE will implement such measures, as appropriate."</p>	<p>As with comment 13 above, the determination of whether or not a project-related lighting issue exists should not be left up to GE. EPA should respond promptly to lighting complaints and determine the degree to which the lighting issue exists, and promptly direct GE to implement control measures as determined appropriate by EPA.</p>
15	Sec. 6 (general comment)	(No text cited)	<p>This plan here includes monitoring of roadway infrastructure conditions, but no traffic monitoring. Traffic monitoring is required in order for EPA and local officials to have the data necessary to evaluate the impact of the project traffic on overall traffic conditions. EPA should direct GE to perform such traffic monitoring as is necessary to understand, in a quantitative manner, the impact of the project on local traffic and to inform EPA's decision-making on potential changes to the project in order to address traffic concerns.</p>
16	Sec. 7.2.3, p. 40	<p>"If the complaint is determined to be project-related and the subject of the complaint has a specific numerical QOL standard (i.e., a complaint relating to air quality or noise), GE will review the relevant monitoring data or conduct monitoring to determine whether there was or is a project-related exceedance of the standard. If there was such an exceedance, GE will implement the process for responding to exceedances of those QOL standards, as described in Sections 4.3.3 and 4.3.4 or Sections 4.4.3 and 4.4.4, as applicable. If there was no such exceedance, GE will work with EPA to evaluate potential mitigation measures to address the complaint, and if mitigation measures are possible and both GE and EPA agree, GE will implement such measures."</p>	<p>Here, and in other locations in this document, GE's text states that measures will be implemented only if GE agrees with EPA that they are needed. This is unacceptable. GE should not hold veto power over EPA's direction to implement mitigation measures under the QoL program. Instead, the actions needed to achieve QoL compliance should be required, not up to GE.</p>

Issue

The procedures for ambient air monitoring for particulate matter and PCBs, including sampling and analytical procedures, will follow those specified in Appendix G (Standard Operating Procedure for Ambient Air Monitoring for Particulate Matter and Polychlorinated Biphenyls) to GE's latest revised Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP; Arcadis 2023), submitted on December 21, 2023, and conditionally approved by EPA on March 21, 2024

Note

Check analytical TATs for PCB air monitoring



Technical Assistance Services *for* Communities

GE-Pittsfield/Housatonic River Site

Comments on the Revised Quality of Life

Compliance Plan

January 10, 2025

Contract No.: 68HERH21A0018

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

Technical Direction: R1 2.12.14 GE Pittsfield

Technical Assistance Services for Communities

Comments on the GE-Pittsfield/Housatonic River Site – Revised Quality of Life

Compliance Plan, November 2024

Introduction

This document provides TASC comments on the GE-Pittsfield/Housatonic River – Revised Quality of Life Compliance Plan (2024 Revised Quality of Life Compliance Plan). This document is for the Berkshire Regional Planning Commission, the city of Pittsfield, the towns of Lee, Lenox, Stockbridge, Great Barrington and Sheffield, Massachusetts Audubon, the Berkshire Environmental Action Team, and other entities to use as they develop comments to share with the U.S. Environmental Protection Agency. TASC does not make comments directly to the EPA on behalf of communities. This document is funded by the EPA’s TASC program. The contents do not necessarily reflect the policies, actions or positions of the EPA.

Pursuant to the Revised Resource Conservation and Recovery Act Permit Modification (Revised Final Permit) issued by the EPA to the General Electric Company on December 16, 2020, for the Rest of River portion of the GE-Pittsfield/Housatonic River site, GE developed and submitted a Statement of Work specifying the deliverables and activities that GE will conduct to design and implement the Rest of River Remedial Action. In accordance with that requirement, GE submitted a Final Revised Rest of River Statement of Work on September 14, 2021. Section II.H.11 of the Revised Final Permit and Section 4.3.1.3 of the Final Revised SOW require that GE prepare a Quality of Life Compliance Plan that discusses how the following topics will be addressed during remediation: (1) potential air quality, noise, odor and light impacts; (2) potential impacts on recreational activities; (3) road use, including restrictions on transportation of waste material through certain residential area and methods to minimize and mitigate transportation-related impacts to neighborhoods, infrastructure, and the general public; (4) coordination with local governments and affected residents/landowners at or near areas impacted by remediation; and (5) community health and safety. On December 20, 2023, GE submitted a Quality of Life Compliance Plan. On July 22, 2024, the EPA issued a conditional approval letter

for that plan, requiring that GE submit a revised plan that addresses the EPA's conditions. The 2024 Revised Quality of Life Compliance Plan constitutes that revised plan.

Summary

The 2024 Revised Quality of Life Compliance Plan has eight sections:

- Introduction
- Description of Remedial Activities
- Coordination with Local Governments
- Quality of Life Standards
- River and Floodplain Recreational Activities
- Road Usage
- Community Coordination and Health and Safety
- References

The document is a sitewide plan that defines the standards and measures that will be applied throughout the Rest of River Remedial Action. Details regarding potential quality-of-life impacts resulting from the remediation, routine design control measures to be implemented to minimize those impacts, the approach to monitoring those impacts, and contingency methods to respond to such impacts during remediation (if necessary) will be developed during remedial design and provided in the Final Remedial Design/Remedial Action Work Plan and Supplemental Information Package for each of the remediation units.

TASC Comments

TASC reviewed the 2024 Revised Quality of Life Compliance Plan, the EPA's conditional letter of approval and previously provided TASC comments to the community from the review of the 2023 Quality of Life Compliance Plan. TASC reviewed the 2024 Revised Quality of Life Compliance Plan to determine if original comments and concerns were addressed, and also identified new topics of consideration for the community. The plan is of particular interest and value to the community since its focus is on the monitoring and control of quality-of-life variables of concern, and represents an opportunity for the community to take an active role in forthcoming communication and monitoring activities. In general, the 2024 Revised Quality of Life Compliance Plan fulfills the requirements set forth in the Statement of Work and Revised Final Permit. However, TASC identified possible future opportunities for the community to be involved. TASC comments provide recommendations to enable community involvement for the monitoring of quality-of-life parameters.

1. Substantial remediation activities such as those to be accomplished for the Rest of River can cause community fatigue and concern. One of the methods to help circumvent the issues that can arise from this condition is to foster community communication with GE and the EPA, where appropriate. TASC has several considerations to share with both the community and GE:

- Formation of a Rest of River-based community group that meets on a routine basis with GE (and others as needed). The focus of the group would be to assist with the compliance of Rest of River activities with the quality-of-life goals. The group would comprise area residents and the meetings could be coordinated through the community liaison (Section 7.1.1, pdf page 45). The Revised Quality of Life Compliance Plan focuses on parameters including monitoring of quality-of-life standards (air, noise and light) as well as impacts on recreation activities. TASC recommends the creation of a community-based organization to coordinate proactively with community leaders, GE, the EPA and others as appropriate to meet on a routine basis and discuss issues as they arise. These meetings could also be used as a platform to discuss future area reuse goals such as enhanced recreation opportunities (as described in Section 5.2 of the Post-Remediation Recreational Enhancement, pdf page 38). This ongoing “open communication” format will help the community be engaged by having GE (and others as needed) listen to their concerns. Furthermore, the outcome would benefit GE by obtaining real-time community feedback and observations of any remediation activity concerns. This community coordination will demonstrate GE’s continued commitment to accomplish its goals and maintain proactive communication.
- Provision of current Rest of River remediation information at community repositories such as town halls and libraries: GE describes its proposed routine communication notification program (Section 7.1, pdf page 45) as including emails and web-based information. While this is useful, these formats are not always available to everyone in the community. It may be prudent to post routine notices in public areas such as town halls and libraries.
- Posting of information to recruit community involvement: TASC recommends that GE post signage around Rest of River work areas (and posters or notices at public buildings) requesting community input for the determination of “future recreational possibilities” (as an example) and to ask interested community members to become involved.
- Involvement of area schools with post-remediation monitoring: Hands-on learning opportunities abound within the Rest of River footprint (where access is allowable and appropriate). Proactive coordination of monitoring with area schools would enable local understanding of the remediation recovery process. TASC recommends that the community liaison, the community group, GE and others reach out to area schools to provide opportunities for involvement where possible and appropriate.

The community may want to consider forming a community-based group that will routinely help monitor quality-of-life parameters within Rest of River remediation areas and assist GE in identifying if any source areas need to be attended to (for instance, types of activities that cause excessive noise or dust). This group could also coordinate discussions addressing appropriate future beneficial reuse possibilities for Rest of River areas where appropriate.

2. The 2024 Revised Quality of Life Compliance Plan focuses on several parameters: air quality, noise, odor and lighting. TASC’s previous comments on the 2023 Quality of Life

Compliance Plan noted that there may be more parameters of interest and concern to the community, including aesthetics (visible impacts on the natural environment). Disturbances in the Housatonic River from remedial action activities are likely to cause visible effects on water quality in the form of turbidity, color and sheen. In addition, occasional fish kills (and other forms of aquatic life) are likely to be visible. In addition, the riverbank soils and upland soils remedial actions will remove terrestrial vegetation. These visible impacts can be disturbing to surrounding communities; therefore, it is important that GE acknowledge these impacts and provide the community with assurance about overall improvements to be achieved by the remedial action. TASC recommends that GE allow the community to express and/or record observations of aesthetic concerns as part of the quality-of-life community coordination public input process so that GE can begin to plan for how significant disturbances will be addressed.

The community may want to ask the EPA if there is a process whereby the community can report visible disturbances to GE during the Rest of River remedial action process.

3. Community health and safety is a priority in the 2024 Revised Quality of Life Compliance Plan. There are several more safety considerations that could be addressed in the plan. For instance, light disturbances are evaluated strictly from the perspective of being a nuisance to surrounding residents. Powerful light sources can also be distracting to motorists and cause traffic safety concerns. This issue is also relevant for construction noise. Sudden loud noises can cause traffic disturbances. The plan should discuss how intense lights and noises will be controlled to ensure traffic safety.

The community may want to ask the EPA if the 2024 Revised Quality of Life Compliance Plan can be amended to include light and noise impacts on traffic safety.

4. In line with the issue described in Comment #3, it may also be important to clarify in the 2024 Revised Quality of Life Compliance Plan if monitoring alarms (used to indicate whether monitored parameter concentrations exceed the notification level) will produce a disturbing noise. The community may be sensitive to audible monitoring alarms and may also perceive construction noise (equipment backup alarms) as the equivalent of a monitoring alarm. Furthermore, if the monitoring alarms are audible, GE should post notices so the community can understand that these alarms are not cause for immediate concern and instead are part of the continuous monitoring process. The 2024 Revised Quality of Life Compliance Plan should describe if the monitoring alarms are audible and if they are distinguishable from ongoing construction-related noise.

The community may want to ask the EPA if the monitoring alarms to detect site construction-related releases of particulate matter will be audible and if GE can post notices explaining these alarms so that the community does not misinterpret them.

5. TASC previously commented on concerns surrounding monitoring analysis that rely on time-weighted averaging procedures. Single-event or low frequency of occurrence disturbances created by air quality, odor, noise and light are difficult to capture using monitoring when analysis results are averaged over time. The process of averaging

dilutes the result from a single event, giving a false impression that these events are not harmful. For instance, a single burst of noise can cause harm and should therefore be acknowledged.

The community may want to ask the EPA if singular event-related issues can be addressed through communication with GE to ensure these events are controlled in the future.

References Cited

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From: [REDACTED]
To: [R1Housatonic](#)
Subject: Comment on the Revised Quality of Life Compliance Plan
Date: Friday, January 31, 2025 11:50:32 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 at the EPA,

We are residents of the Town of Lee, MA writing to express uneasiness about the "Revised Quality of Life Compliance Plan" for the Housatonic River Project. The potential risks to public and ecological health, and other quality of life aspects will remain an ongoing concern for decades. It is not clear to us how public and ecological health will be consistently monitored and studied over time. Any baseline and continuous health data collection and/or studies do not appear to be mentioned. Neither does there seem to be any plan to involve local health departments or impartial medical or ecological entities. It also seems imprudent to allow GE to be responsible for reporting data to the EPA for ANY quality of life monitoring when gross irresponsibility has been the modus operandi. The EPA must make sure there are independent long term health and quality monitoring provisions in the plan to hold GE accountable at GE's expense. No one knows for sure how this remediation project will actually play out in real life. Too much left unspecified leaves too much room for more negligence at the further expense of our Townspeople and environment.

In addition, we have had the experience of heavy laden dump trucks barreling past our house day after day. It sounded like the National Guard had been deployed and stationed down the street. We are concerned for our neighbors closer to the worksites who will be exposed to noise at far greater decibel levels than town ordinances allow. It also looks like the report allows that extended work hours between 9PM and 7AM are a possibility. That will make the situation intolerable and will certainly affect the health of residents whose sleep is disturbed. Further noise restriction is needed to keep it within town limits and time frames.

Throughout this whole process, we have lost trust that GE proposals hold Berkshire County concerns as their highest priority over self interest. Please consider that these aspects of the plan need to go back to the drawing board for more accountability regarding the health, safety and quality of life of Berkshire residents.

Sincerely,

James and Christine Schwarz

[REDACTED]
Lee, MA [REDACTED]

From: [Joshua Bloom](#)
To: [Draper, Lauren](#); [R1Housatonic](#); [Brooks, Ashlin](#)
Cc: [Tobias Berkman](#)
Subject: Request for a public hearing on GE's Revised Quality of Life Compliance Plan and Public Comments
Date: Thursday, January 9, 2025 12:49:49 PM

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

Dear Lauren, Ashlin, and EPA colleagues,

I want to request that the EPA schedule a public meeting with GE regarding their Revised Quality of Life Compliance Plan prior to the public comment deadline. I think it is crucial to specifically invite stakeholders from the Berkshires business, tourism, and hospitality industries and Berkshire public health and medical professionals. Please respond to me on this specific request.

My further public comments about GE's Revised Quality of Life Compliance Plan can be found below and are similar to my original comments about GE's original Quality of Life Plan with the exception of acknowledging that GE modified their original QoL Plan to reflect the updated draft Transportation Plan.

I am concerned that GE did not conduct outreach to the Berkshires business, tourism, and hospitality industries as it should have done as part of the preparations for their original plan and then again prior to submitting their revised plan.

It is unfathomable that GE again does not mention "health" even once in its report section on "Community Coordination and Health and Safety." There is no mention of any baseline public health data collection or longitudinal health studies. There is no mention of engaging local Departments of Health, hospitals, and medical professionals. The EPA must reject this report section and demand that GE properly address public health in its plan. The EPA must hold GE accountable to address how it will protect the health of area residents.

While GE is not beholden to municipal or state regulations related to traffic, noise, light, and smell because of the federal nature of their project, it would be respectful for GE to comply with local town noise regulations and considered disrespectful to ignore and exceed local noise regulations. GE has not adjusted its noise standards to be within the local standards in the company's Revised Quality of Life Compliance Plan. The EPA should insist that GE further restrict its noise limits to be within local standards.

The Quality of Life Compliance Plan addresses recreational activities along the river, but only takes into consideration recreational activities in the river (boating and fishing) and immediately on the banks of the river (walking and biking trails) where remediation work is being actively conducted, but fails to address the impact of municipal parks and playgrounds located along where PCB contamination impacts our communities. At a time when river trails are being expanded in the Berkshires, it is important to know if GE bears any financial responsibility toward those projects or towards park and playground enhancements. GE may want to consider voluntarily underwriting costs of the river trail in the Southern Berkshires.

Sincerely,
Joshua Bloom

Lee, MA

CCC Member

former Housatonic Rest of River Municipal Committee Member

January 27th, 2025

U.S. Environmental Protection Agency, New England Region
Five Post Office Square
Suite 100
Boston, MA 02109

RE: COMMENTS ON GENERAL ELECTRIC'S REVISED QUALITY OF LIFE COMPLIANCE PLAN FOR THE REST OF RIVER REMEDIAL ACTION

I am writing to comment on General Electric's (GE) submitted Revised Quality of Life Compliance Plan for the Rest of River Remedial Action. A hazard is anything that could cause harm, whereas risk is the likelihood of that harm actually occurring. EPA officials identify fish consumption from the Housatonic River—under a biota consumption advisory for PCB contamination—as the most significant hazard, yet an avoidable risk if individuals simply choose not to consume it. However, the cleanup process introduces an unavoidable hazard: breathing air that may contain contaminated particulates (including PCBs) and diesel emissions. In effect, **the plan asks residents to exchange an avoidable exposure pathway (eating fish) for a potentially unavoidable one (breathing polluted air)**. Therefore, I urge the EPA to strengthen short-term, actionable air-quality monitoring and mitigation requirements, ensuring that the public is not burdened by a new and immediate source of unavoidable risk.

1. AIR QUALITY STANDARDS AND THE NEED FOR REAL-TIME MONITORING

The described Air Quality Standard in the compliance plan **is not protective** because it fails to provide timely warnings or enable prompt remedial actions. **A consumer-level, real-time air monitoring device would offer more immediate and protective data for the community than the current proposal.** The current proposal relies on laboratory analyses that can take weeks to yield results, and even longer for that information, if ever, to reach the public.

The current lack of adequate EPA Air Quality Index monitoring in Lee or Lenox coupled with significant delays in obtaining air sample results as described, paints a dreary

picture for the ability to provide adequate public warning regarding airborne pollutants produced as a result of this project. There is a desperate need for additional real-time monitoring stations closer to the UDF in Lenox or Lee.

In addition to measuring for airborne PCBs, and particulate matter, sampling should include NO₂, CO, O₃, and SO₂. Realtime air monitoring should be started immediately to establish reliable background readings. Reliable background measurements are critical, as they provide a well-documented baseline for determining whether any increase in pollutants stems from remedial activities or another source.

2. EMISSION ACCOUNTABILITY FOR COMMERCIAL VEHICLES

On page 31 of the Revised Quality of Life Plan, the listed restricted roads pertain only to Pittsfield, overlooking areas that will be directly impacted by the Rest of River cleanup. In keeping with the Revised Final Permit's requirement to restrict waste transport through residential areas and minimize transportation-related impacts, we respectfully request that **the plan be updated to prohibit transport through the Lenox Village Historic District**, specifically at the intersection of Walker Street, Main Street, West Street, and Old Stockbridge Road. This junction—over 250 years old and originally an animal trail used by Native Americans—remains a delicate, overworked hub never designed to handle modern traffic volumes, let alone the strain from large commercial vehicles involved in this project.

Further, large commercial vehicles exceeding 3,000 pounds GVW will pose significant diesel exhaust and safety concerns when used during the cleanup process. Idling restrictions must be strictly enforced, particularly near homes, schools, and environmentally sensitive areas to limit both health and environmental impacts from diesel exhaust and noise pollution. Because residents must share narrow, historically designed New England roads with large commercial vehicles, it is essential for the cleanup project to maintain a comprehensive and regularly updated registry (e.g., a spreadsheet) of all trucks as they come into service. **All commercial vehicles entering or exiting remediation sites must be clearly marked**, enabling the public to lodge complaints when necessary.

3. LOCAL HIRING REQUIREMENTS

GE would foster greater trust and shared responsibility within the community by considering a local hiring requirement to ensure that communities disproportionately affected by the contamination and ensuing cleanup efforts benefit economically from the remediation process. This can be achieved by prioritizing the hiring of local residents and contractors whenever possible, documenting recruitment efforts (including local job postings, community outreach, and job fairs), and transparently explaining any shortfalls in meeting established hiring targets, supported by data on the number of local applicants compared to overall hires.

4. PROTECTING PROPERTY VALUES: A CORNERSTONE OF QUALITY OF LIFE

“Quality of life” extends far beyond environmental metrics and must also encompass the welfare of local homeowners, whose property often represents their most significant lifetime investment. Any decline in property values due to remediation activities would not only burden individual residents but also erode the tax base on which critical public services—such as schools, infrastructure, and safety—depend. This risk effectively undermines the very notion of an improved quality of life if the broader community’s resources become strained. It is therefore essential for the report to recognize and address potential impacts on property values, and for GE to propose clear, transparent mitigation measures that protect both individual homeowners and the wider economic and social fabric of the region.

5. PRESERVING SCENIC VISTAS IN THE BERKSHIRES

The cleanup plan must prioritize minimizing the visual impact of its operations to protect the Berkshires' breathtaking vistas, which are central to the region’s cultural, economic, and aesthetic identity. These sweeping mountain and river views define the area, attracting visitors, supporting local businesses, and sustaining communities. The proposed UDF and its associated reaches risk intruding on the scenic panoramas visible from downtown Lee and Lenox, threatening the natural beauty that defines the Berkshires. The visual impact from the street must be carefully addressed, as any

degradation of these landscapes would likely weaken the region's character and the economy that relies on its unspoiled charm. Preserving these vistas is essential to maintaining the Berkshires' enduring appeal and vitality.

In conclusion, while the Revised Quality of Life Compliance Plan for the Rest of River Remedial Action represents a critical step toward addressing PCB contamination in the Housatonic River, it falls short in safeguarding the community from new and immediate risks introduced by the cleanup process. **The plan must prioritize real-time air quality monitoring, stricter road safety and emission controls, local hiring initiatives, protection of property values, and preservation of the Berkshires' scenic vistas to truly uphold its promise of improving quality of life.** These measures are not merely optional enhancements but essential safeguards to ensure that the remediation effort does not inadvertently harm the very community it seeks to protect. I urge the EPA and GE to adopt these recommendations, fostering a cleanup process that is not only environmentally responsible but also equitable, transparent, and respectful of the region's unique cultural, economic, and ecological heritage. Only then can this plan achieve its intended goal of restoring the Housatonic River while preserving the health, well-being, and prosperity of the communities it impacts.

Sincerely,

A handwritten signature in blue ink that reads "Michael Lucia". The signature is fluid and cursive, with the first name "Michael" being larger and more prominent than the last name "Lucia".

Michael Lucia

[REDACTED]
Lenox, MA [REDACTED]