Public Input on the following General Electric Documents:

- Upland Disposal Facility Revised Final Design Plan, dated December 20, 2024
- Upland Disposal Facility Revised Operation, Monitoring, and Maintenance Plan, dated December 20, 2024
- Proposed Dewatering and Water Treatment Systems for Upland Disposal Facility Area Addenda, dated December 20, 2024

December 2024 – February 2025

Public Input ended on February 10, 2025

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
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Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
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February 10, 2025

Via 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 *Conceptual Sediment Dewatering and Water Treatment Evaluation; Dewatering/Water Treatment Treatability Study Work Plan; and Sediment Dewatering and Water Treatment Systems Conceptual Operations, Monitoring, and Maintenance Plan,* prepared for General Electric Company by Arcadis – GE/Housatonic River Site

Dear Mr. Tagliaferro:

On December 20, 2024, The Massachusetts Department of Environmental Protection (Department or MassDEP) received the *Conceptual Sediment Dewatering and Water Treatment Evaluation; Dewatering/Water Treatment Treatability Study Work Plan; and Sediment Dewatering and Water Treatment Systems Conceptual Operations, Monitoring, and Maintenance Plan* (collectively the Addenda), prepared for General Electric Company (GE) by Arcadis in parallel with revisions to the Upland Disposal Facility Revised Final Design Plan. The Department has reviewed the Addenda and submits the following comments, numbered below.

Conceptual Sediment Dewatering and Water Treatment Evaluation

1. Section 2.0: The final water treatment system design should include a water budget which presents how influx from the selected dewatering technologies and precipitation events will

be stored and managed during regular operations and in the event of unanticipated water treatment system shutdown.

2. Section 4.2.3: The proposed effluent discharge criterion, including PCBs, for the water treatment system at the UDF should be consistent with the standards applied to the Pittsfield Building 64G discharge.

Dewatering/Water Treatment Treatability Study Work Plan

3. If seasonal variation in algal or microbial constituents present in Woods Pond and/or Valley Mill Pond may alter performance characteristics of either or both dewatering technologies, bench-scale testing should be performed with pond water collected at timepoints representative of this variable.

Sediment Dewatering and Water Treatment Systems Conceptual Operations, Monitoring, and Maintenance Plan

4. Operation of the UDF Water Treatment facility should be conducted by appropriately trained and licensed Wastewater Treatment System Operators in accordance with the requirements of 257 CMR 2.00: *Certification of Operators of Wastewater Treatment Facilities.*

Thank you for the opportunity to comment on this document. Please contact Ben Guidi (benjamin.guidi@mass.gov) or Jason Perry (jason.m.perry@mass.gov) if you have any questions or need clarification on these comments.

Sincerely,

/s/ Tamara Cardona-Marek

Tamara Cardona-Marek, PhD
Deputy Regional Director, MassDEP
Bureau of Waste Site Cleanup

ec: Michael J. Gorski, DEP WERO
Benjamin Gudi, DEP WERO
Jason Perry, DEP WERO

TOWN OF LENOX
6 Walker Street, Lenox, MA 01240
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Jay R. Green, J.D.
Town Manager

February 10, 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: Upland Disposal Facility Revised Final Design Plan and Revised Operation, Monitoring, and Maintenance Plans, December 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 UDF Plans (Arcadis, December 2024)

The UDF Design and OMM Plans were previously review and commented upon by the Town and Weston & Sampson and were found to be acceptable with some comments provided. Lenox is generally pleased with the information provided and the effort put into design. Comments are provided to the Air Monitoring plan that has been newly incorporated into the OMM Plan.

Air Monitoring Plan

The Ambient Air Monitoring Plan is considered to be complete but does not contain all of the details deemed necessary during ROR remediation implementation.

Comment: Lenox would like to see plans for communication of action level exceedances for PM_{10} or PCBs to the Towns or receive a commitment from EPA that they will route the written notice provided by GE to Town Governments. Lenox would also like to receive information on stop-work occurrences, the reason for the stop-work action, and the resolution that allowed for work to restart.

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

Weston & Sampson

712 Brook Street, Suite 103, Rocky Hill, CT 06067
Tel: 860.513.1473

MEMORANDUM

TO: Jay Green, Town Manager, Lenox, MA

FROM: Weston & Sampson

DATE: February 10, 2025

SUBJECT: Weston & Sampson Review of Proposed Dewatering and Water Treatment Systems for UDF Area Plan

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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:

- ***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***, Arcadis, December 2024.

In this memorandum, we provide our comments on the conceptual dewater plans presented in the document. It is understood that there is additional evaluation of means and methods required before this plan can be issued as a Draft. As such, comments have been provided to express the concerns of the Town and additional information that the Town would like to see in future dewatering documents.

For the use of geotextile tubes, Lenox would like to see design drawings for the pad on which the tubes will be stored, secondary containment measures, and the location of sumps for the collection of dewatering effluent. The Town agrees that there is likely to be sufficient space to construct the pad near the UDF but would like to see the proposed layout before providing additional comment. Lenox does not support placing geotextile tubes within the UDF to be dewatered. If this is proposed, the Town would like to review a detailed narrative as to why this is considered to be appropriate and an effective means for dewatering.

For mechanical dewatering systems, it is mentioned that most of the treatment systems components will be housed within a building. Lenox would also like to see the design drawings for any such mechanical systems as well as the building. Narrative associated with mechanical systems should also include discussion of means and methods to reduce noise from these operations.

There is mention of potential 20 to 24 hour operation for the dewatering systems. Lenox does not support 24-hour operations and would like to review a detailed narrative of why this type of operation is required before they would concur, especially if mechanical dewatering systems are employed.

Monitoring for influent and effluent flows is discussed in general and the Town looks forward to the opportunity to review the monitoring requirements in detail. There is also mention of a treated water outfall but no proposed location is provided. The location of this discharge point is of interest to the Town.

The Town withholds any additional comments until GE has had the opportunity to complete the testing described in the conceptual plan. It is assumed that GE will publish their findings from the testing along with additional design information in a Draft Design Plan to be submitted to EPA.

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 SUBMITTIALS 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

UDF Revised OMM Plan Comments				
Comment #	Report/Section/Page	Text	Comment	Discussion for HRI
1	Sec. 2.4, p. 8	"During construction of the UDF, such monitoring will be conducted at five locations on the GE Parcel, shown on Figure 3, for a minimum of 10 hours (7 a.m. to 5 p.m.) throughout the duration of daily active construction activities. If construction activities are ongoing for longer than 10 hours in a given day, particulate monitoring will continue until daily activities are complete. The quality-of life standards for airborne particulate matter, which include Notification and Action Levels, and the actions to be taken in responses to exceedances of those levels (including notifications and contingency measures) are described in Section 4.3 of the Revised QOL Plan and in the revised AAMP."	EPA should direct GE to perform the air monitoring discussed in this section throughout the entire 24 hour period every day, regardless of construction schedule, as there is a potential for releases of airborne contaminants from the unclosed UDF whether or not the contractor is actively working in the UDF. The potential for air releases should govern air monitoring, not work schedule.	
2	Sec. 3.3.2, p. 15	At the beginning of UDF operations, PCB air monitoring will be conducted for two sequential 24-hour periods (i.e., two back-to-back daily events) to confirm that representative airborne concentrations for PCBs do not exceed the designated air quality standards for PCBs, set forth in Section 4.3 of the Revised QOL Plan and the revised AAMP. If this PCB monitoring indicates that air levels are acceptable (i.e., are below the PCB Notification Level), the monitoring frequency will be reduced to one 24-hour monitoring event weekly for the remainder of UDF operations. The procedures for collection and analysis of air samples for PCB analysis using low-volume samplers are provided in Appendix G of the FSP/QAPP. The PCB Notification and Action Levels and the actions to be taken in responses to exceedances of those levels (including notifications and contingency measures) are described in Section 4.3 of the Revised QOL Plan and in the revised AAMP.	EPA should not allow GE to reduce or suspend air monitoring as a result of two days of air data. GE should be required to perform 24 hour air monitoring at all times when there is a potential for PCB releases to air.	

Comments on Conceptual Dewatering and Water Treatment Evaluation, Dewatering / Water Treatment Treatability Study Work Plan, and Sediment Dewatering and Water Treatment Systems Conceptual Operations, Monitoring, and Maintenance Plan				
Comment #	Report Section/Page	Report Text	Comment	Discussion for HRI
1	Conceptual Dewatering and Water Treatment Evaluation Sec. 4.2.1, p. 10	PCBs are the primary COC for the ROR water treatment system at the UDF. Dissolved-phase PCB concentrations are expected to range from 0.04 micrograms per liter (µg/L) to 150 µg/L in the untreated generated water (i.e., water treatment system influent) based on concentrations observed in the 1.5-Mile Reach treatment system influent. PCBs existing as free product are not expected to be present in the water treatment system influent.	EPA should direct GE to develop plans to address the possibility that free phase PCBs may be encountered as part of the system influent, including monitoring to determine if free phase liquids are present.	
2	Dewatering/Water Treatment Treatability Study Work Plan, Sec. 2, p. 3	To achieve these overall objectives, the data quality objectives (DQOs) for the treatability studies presented herein are as follows: DQO 1. Evaluate the effectiveness of dewatering technologies in handling sediment to be hydraulically conveyed to the UDF. DQO 2. Evaluate the effect of de-sanding the sediment slurry before initiating the dewatering operations. DQO 3. Evaluate potential PCB, dewatering polymer, toxicity, and other chemical concentrations within the water generated during sediment dewatering and leachate generation at the UDF.	EPA should direct GE to add an additional DQO for this planned work. This DQO would be for the treatability study to assess the ability of the treatment technologies to meet the effluent standards set for the project. EPA's direction to GE on this issue should also include diretion that appropriate testing be specified in this plan to achieve this DQO.	
3	Sediment Dewatering and Water Treatment Systems Conceptual Operations, Monitoring, and Maintenance Plan, Sec. 4, p. 8	Compliance samples to monitor the water quality of the treatment system discharge effluent will be collected every other day during the first week of operation, weekly for the rest of the first month, and once every other week for the balance of the water treatment system operation, unless, based on proven system performance, a reduced frequency is proposed by GE and approved by EPA.	EPA should direct GE to perform compliance sampling of the discharge effluent daily, until a robust data set demonstrating proven system performance allows EPA to consider a reduced compliance sampling frequency.	