Public Input on the following General Electric Documents:

- Conceptual Remedial Design/Remedial Action Work Plan for Reach 6, dated October 31, 2024
- Pre-Design Investigation Summary Report for Reach 6, dated October 31, 2024
- Baseline Restoration Assessment Report for Reach 6, dated October 31, 2024

February 2025

Public Input received after the February 3, 2025, deadline

From:	Guidi, Benjamin (DEP)
To:	Fontaine, Joshua
Cc:	Cardona-Marek, Tamara (DEP); Perry, Jason M (DEP); Fisher, Richard
Subject:	RE: EPA GE-Housatonic Site: Reach 6 Documents Open for Public Input - October 2024
Date:	Monday, February 10, 2025 10:11:31 AM
Attachments:	image004.png image005.png

Hi Josh,

I know this is late for a comment on the Reach 6 Conceptual RD/RA but we were working on a comment to the UDF Final Design Addenda and it seemed more germane to the reach-specific plans. If you're still drafting a CAL for Reach 6 Conceptual, please consider whether this idea is worth including:

In the Water Withdrawal and Uses Plan (9/2022) GE stated that water withdrawals would be analyzed in greater detail in Reach-specific plans. That document was mostly focused on existing (mostly industrial) uses of river water and how to complete the remedial actions without impinging on them. At the time hydraulic dredging was only in the beginning of feasibility analysis, and the dredging itself was not analyzed as a water withdrawal.

Based on our read of the current dredging and dewatering plans, there may be some lag between when water is entrained in the dredge slurry and when it returns to the river. This will depend on final plans and designs for the dewatering technology they haven't developed yet.

We hope that the Reach 6 **Final** RD/RA Work Plan will address whether there will be impacts on water flow in the river/Woods Pond from hydraulic dredging, and if so that it will have some written plans along the lines of for how they would throttle, modify, or suspend hydraulic dredging in the case of drought or low river flows.

Rich has pointed out this wasn't included in the ARARs but we were thinking along the lines of Massachusetts Water Resources Management regulations (310 CMR 36.00) for industrial uses.

If a conversation would be helpful, I'd be happy to talk through the idea and when/if/how to work it in to the process.

Thanks,

Ben

Benjamin Guidi
Environmental Analyst – Audits
Mass DEP - Bureau of Waste Site Cleanup
436 Dwight St.
Springfield, MA 01103
857-383-7476

From: Fontaine, Joshua <Fontaine.Joshua@epa.gov>
Sent: Tuesday, November 5, 2024 4:32 PM
To: traci.iott@ct.gov; Papp, Carol <Carol.Papp@ct.gov>; Guidi, Benjamin (DEP) <Benjamin.Guidi@mass.gov>; Perry, Jason M (DEP) <Jason.M.Perry@mass.gov>
Subject: FW: EPA GE-Housatonic Site: Reach 6 Documents Open for Public Input - October 2024

Good afternoon,

Please see the below message regarding notice of public input periods on Reach 6 related documents. EPA is requesting any comments on these documents be provided by February 3, 2025.

Let me know if you have any questions.

Sincerely,

Josh Fontaine
Remedial Project Manager
US EPA Region 1
Superfund and Emergency Management Division
5 Post Office Square (07-02) | Boston, MA 02109
Phone: 617-918-1720 | Fax: 617-918-0720
fontaine.joshua@epa.gov

EPA
United States
Environmental Protection
Agency

From: Brooks, Ashlin <Brooks.Ashlin@epa.gov>
Sent: Monday, November 4, 2024 3:43 PM

To: R1Housatonic <R1Housatonic@epa.gov>
Subject: EPA GE-Housatonic Site: Reach 6 Documents Open for Public Input - October 2024

Good Afternoon,

In accordance with the Consent Decree and the December 2020 Rest of River Permit, EPA has the approval authority over GE's Housatonic Rest of River Permit submittals for the Housatonic River cleanup work, after reasonable opportunity for review and comment by the Commonwealth of Massachusetts and the Connecticut Department of Energy and Environmental Protection (CT DEEP). Although there is no formal public comment period on Rest of River Permit submittals, EPA has committed to making certain GE's submittals are available to the public and other stakeholders prior to EPA formally responding to GE whenever practical. EPA will consider input timely received prior to responding to GE's submittal, but there will not be a formal response to input/comments received.

On October 31, 2024, GE submitted the following Reach 6 Documents:

Conceptual Remedial Design/Remedial Action Work Plan for Reach 6
https://semspub.epa.gov/src/document/01/652552

Pre-Design Investigation Report for Reach 6
https://semspub.epa.gov/src/document/01/652551

Baseline Restoration Assessment Report for Reach 6
https://semspub.epa.gov/src/document/01/652550

Public input on these documents should be sent to R1Housatonic@epa.gov by **Monday, February 3, 2025**.

EPA may publish all comments received to a public docket and on EPA's website. By submitting a comment, you agree to public release of any information submitted. Any personally identifiable information (for example, name, home address, e-mail address, and phone number) may be publicly disclosed. Do not submit electronically any information you consider to be Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Please contact EPA for alternative submission methods if you seek to submit such information.

For all documents subject to public input, see EPA's web page button titled "Opportunities for input on Housatonic rest of River Permit Submittals" as highlighted below:

- Why cleanup the GE Site and the Housatonic River?
- What progress has been made?
- How much longer will the total cleanup take?

- Fast Facts: Housatonic River PCBs
- How do PCBs get into the environment?
- How do PCBs get into plants and animals?
- Wildlife and Human Health Effects from PCBs
- Understanding the Housatonic Rest of River and Floodplain Risk Assessments

Stay Updated!

- Opportunities for Input on Housatonic Rest of River Permit Submittals
- Follow the Housatonic Cleanup on Facebook EXIT
- Newsroom
- Public Comment, Meetings and Events
  - Public Comments and Hearing Transcripts on Draft Revised 2020 Permit
- Contact Us

Thank you very much,

Ashlin Brooks
Community Involvement Coordinator
U.S. EPA - New England, Region 1
5 Post Office Sq, Suite 100
Boston, MA 02109
Cell: (617) 913-9140

EPA United States Environmental Protection Agency

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

R. Christopher Brittain,
Town Administrator

February 4, 2025

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

Dear Mr. Tagliaferro:

The Town of Lee submitted comments for the Conceptual Remedial Design/Remedial Action Work Plan for Reach 6 (Anchor QEA, 2024) on February 3, 2025. Below, please find additional comments and questions from the Town of Lee regarding these documents:

1. How will EPA/GE determine that the remediation will comply with the future performance standards (i.e., Downstream Transport Performance Standard and Biota Performance Standard)? Is a modeling/prediction algorithm used?
2. The engineered cap in Woods Pond will not be placed until all of the upstream remediation is complete so how would PCB-contaminated sediment accumulate above the cap? If PCB-contaminated sediment is found above the cap, then it means that the remediation was ineffective/incomplete. The remediation will significantly disrupt the Woods Pond ecosystem and the surrounding communities. EPA must ensure that GE's remediation is effective, appropriately conservative, and <u>final</u> to avoid any future disruption to "re-remediate" Woods Pond.
3. The details of the engineered cap in the report are inconsistent with the construction details in Appendix C. Also, neither section shows the "geotechnical filter" referenced in the report.
4. Section 2.3.2 is somewhat vague, please confirm that no remediation of vernal pools is planned for Reach 6 based on the completed sampling program.
5. Why are the thresholds for on-site disposal higher for soils (PCB$\leq$50 mg/kg) than sediments (PCB$\leq$25 mg/kg)?

concentration was > 100 mg/kg in sediment samples SE001013 (excluded sample), SE001020, SE001390 and SE001391; however, it was concluded that all sediment from Woods Pond and the outlet channel will be transported to the UDF. Valley Mill Pond: Conversely, a footnote in Table 3, *Spatially Weighted Average PCB Summary: Valley Mill Pond – Disposal*, identifies individual sediment samples that had a total PCB concentration greater than 100 mg/kg in Valley Mill Pond, would require off-site disposal.

18. PDF pg 148 of 566: The text states that sample location S18S5 would not require surface remediation, and PDF pg 162 of 566: Table 2, *Spatially Weighted Average PCB Summary: Valley Mill Pond*, highlights sample location ID S18S5 as having a concentration below the remedial criteria. The concentration was reported to be 4.35 mg/kg; however, the remedial criteria was not provided on the table. Please provide the criteria on the table.

19. PDF pg 149 of 566: "Attachment E of the Revised Final Permit also requires that sediments to be disposed of in the UDF have a volume-weighted average PCB concentration of less than or equal to 25 mg/kg. **The volume-weighted average of the remaining 9,100 cy of sediments to be removed from Valley Mill Pond is approximately 46 mg/kg**, which exceeds the UDF disposal criterion in the Revised Final Permit. **As a result, approximately 5,400 cy of additional sediment with the highest PCB concentrations will be segregated for off-site disposal.** The remaining 3,700 cy (averaging 22 mg/kg) will be subject to disposal in the UDF." The first bolded sentence indicates that there is 9,100 cy of sediment that have a volume-weighted average which exceeds the permissible limit for disposal in the UDF. The second bolded sentence indicates that as a result, 5,400 cy will be disposed off-site. Why wouldn't 9,100 cy of sediment be disposed off-site?

Sincerely,

R. Christopher Brittain
Town Administrator

From: Draper, Lauren
To: Carli-Dorsey, Alexander
Subject: FW: Webform submission from: Contact Us About the GE-Pittsfield/Housatonic River Site
Date: Tuesday, February 18, 2025 12:32:07 PM

From: US EPA <drupal_admin@epa.gov>
Sent: Thursday, February 13, 2025 7:01 AM
To: Draper, Lauren <Draper.Lauren@epa.gov>
Subject: Webform submission from: Contact Us About the GE-Pittsfield/Housatonic River Site

Submitted on February 13, 2025 7:00 am EST

Submitted by: Anonymous

Submitted values are:

Where should we direct your comment?
Public Comments in Response to Public Comment Period

Comments
I again write because of my concern for the extremely long period planned for the remediation process. I am convinced that improvement in the water treatment and dewatering plan will allow similar improvement in the rates of hydraulic excavation and transport from reach 5C and Woods Pond. If the size of the dewatering area at the UDF is not a limiting factor, then the water treatment plant itself should be improved, perhaps by enlarging the filter presses or increasing their number, in order to maximize the rate that material that can be processed. If, for example, the maximum water treatment processing rate can be quadrupled, the excavation rates at both 5C and Woods Pond could be doubled and run concurrently, decreasing the time for remediation by a factor of 4.

All the waste from Rising Pond should be taken off-site by rail, as stipulated by the the 2020 Final Permit. ThRising Pond remediation can take place concurrently with 5C and Woods Pond.

Decreasing the time frame for remediation not only reduces the risks to the downstream communities and environment, and decreasing the period of nuisance for all those living and working in our towns.

Charles Kenny MD

Medical Director, Tri-Town Health Department

I'm commenting on a Web page:
{Empty}

Name
Charles Kenny MD

Organization
Medical Director, Tri-Town Health Department

State
Massachusetts

Email Address
[redacted]

Phone
[redacted]

Are you human?
Yes

Web Area
Contact Us About the GE-Pittsfield/Housatonic River Site

From: Draper, Lauren
To: Carli-Dorsey, Alexander
Subject: FW: Webform submission from: Contact Us About the GE-Pittsfield/Housatonic River Site
Date: Tuesday, February 18, 2025 12:32:01 PM

From: US EPA <drupal_admin@epa.gov>
Sent: Monday, February 10, 2025 11:36 AM
To: Draper, Lauren <Draper.Lauren@epa.gov>
Subject: Webform submission from: Contact Us About the GE-Pittsfield/Housatonic River Site

Submitted on February 10, 2025 11:36 am EST

Submitted by: Anonymous

Submitted values are:

Where should we direct your comment?
Public Comments in Response to Public Comment Period

Comments
A. To reduce the time and cost of work in areas of Woods Pond and Rising Pond, drain the ponds reducing the need for de-watering - a major problem with the slurry system which generates one trillion gallons of water as currently planned. Once drained, bail muck with several long reach wide bucket excavators. Many many times faster than the slurry system, while reducing cost
B. Use Columbia Mill property for staging and de-watering with rail access.
Will describe and elaborate if interested.
D.F. Carrington, Lee, Retired Contractor

I'm commenting on a Web page:
Pittsfield/Housatonic River Site

Name
David Carrington

Organization
Caroline Young

State
Massachusetts

Email Address
[redacted]

Phone
[redacted]

Are you human?
Yes

Web Area
Contact Us About the GE-Pittsfield/Housatonic River Site