Public Input on the following General Electric Documents:

- Revised Operations, Monitoring, and Maintenance Plan for Woods Pond Dam, dated December 19, 2024
- Revised Operations, Monitoring, and Maintenance Plan for Rising Pond Dam, dated December 19, 2024

December 2024 - April 2025

Public Input Period Ended on April 11, 2025

Comments on "Operation, Monitoring and Maintenance Plan Woods Pond Dam, GZA, Dec. 2024				
Comment #	Section	Page	Report Text	Comment
1	3.2	p. 15-16	"3.2 TOPOGRAPHIC AND BATHYMETRIC SURVEYS GE will conduct periodic topographic and bathymetric surveys of the Dam to monitor for signs of movement, settlement, erosion, and scour at the Dam. The potential scour hole noted at the toe of the spillway will be monitored during the periodic topographic and bathymetric surveys. The surveys will be conducted every five years."	This section should include supplemental surveys after significant high flow events. EPA should determine the criterion for triggering this supplemental survey work, based on the potential for significant high flow events to impact the area in the vicinity of the dam. This would also include modifying Section 8, in the tables containing inspection activities to be performed under this plan.
2	Appendix B	Figure 1	(Flow chart following page 4)	(Editorial) Figure 1 is inverted in the PDF file available for review. This should be corrected for usability in case of emergency.
3	Appendix B	p. 21	"These routine inspections will be augmented with inspections after every high-flow event, defined as a flow event with a peak river flow of 1,500 cfs or greater at the U.S. Geological Survey (USGS) gage at Coltsville or 3,650 cfs or greater at the USGS gage on the Housatonic River at Division Street in Great Barrington, or after an earthquake with reported damage in Berkshire County."	This passage in Appendix B states that inspections will be done after peak river flows of 1500 cfs or greater. This portion of Appendix B should be used to address the comment above convening supplemental surveys after high flow events.

Comments on "Operation, Monitoring and Maintenance Plan Rising Pond Dam, GZA, Dec. 2024				
Comment #	Section	Page	Report Text	Comment
1	3.2	p. 15-16	"GE will conduct periodic topographic and bathymetric surveys of the Dam to monitor for signs of movement, settlement, erosion, and scour at the Dam. The surveys will be conducted every five years."	This section should include supplemental surveys after significant high flow events. EPA should determine the criterion for triggering this supplemental survey work, based on the potential for significant high flow events to impact the area in the vicinity of the dam. This would also include modifying Section 8, in the tables containing inspection activities to be performed under this plan.
2	Appendix B	21	"These routine inspections will be augmented with inspections after every high-flow event, defined as a flow event with a peak river flow of 3,650 cfs or greater at the U.S. Geological Survey (USGS) gage on the Housatonic River at Division Street in Great Barrington, or after an earthquake with reported damage in Berkshire County."	This passage in Appendix B states that inspections will be done after peak river flows of 3650 cfs or greater. This portion of Appendix B should be used to address the comment above convening supplemental surveys after high flow events.

Technical Assistance Services *for* Communities
GE-Pittsfield/Housatonic River Site Comments on the Revised Operation, Monitoring, and Maintenance Plan for Rising Pond Dam March 3, 2025

Contract No.: 68HERH21A0018
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Technical Direction: R1 2.12.14 GE Pittsfield

Technical Assistance Services for Communities
Comments on the GE-Pittsfield/Housatonic River Site – Revised Operation, Monitoring, and Maintenance Plan for Rising Pond Dam, December 2024

Introduction

This document provides TASC comments on the 2024 GE-Pittsfield/Housatonic River – Revised Operation, Monitoring, and Maintenance Plan for Rising Pond Dam (Revised OM&M Plan for Rising Pond Dam). 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 the Revised OM&M Plan for Rising Pond Dam. Section II.B.2.j.(1)(a) of the Revised Permit requires GE to minimize the releases of polychlorinated biphenyls from the Rising Pond impoundment by "ensuring inspection, monitoring, and maintenance" of the Dam and impoundment. Section II.B.2.j.(2)(a) required GE to "operate, inspect, monitor, and maintain" Rising Pond Dam. It specifies that such activities "shall include, (i) maintaining the integrity of the dam to contain contaminated sediments and (ii) conducting materials handling and off-site disposal and engineering controls related to dam maintenance, repair, upgrades, and enhancement activities (including, but not limited to, addressing sedimentation in sluiceways,

conveyances, and other channels that transport water over, through, or around the dam; and (iii)… all other related activities."

Summary

The Revised OM&M Plan for Rising Pond Dam has nine sections:

1. Introduction and Background
2. Operations
3. Monitoring Program
4. Maintenance and Repairs
5. Emergency Response
6. Training
7. Record-Keeping and Reporting
8. Schedule
9. References

The purpose of the Revised OM&M Plan for Rising Pond Dam is to describe the procedures to be followed by GE to operate, monitor and maintain Rising Pond Dam. The overall objective is to minimize releases of PCBs in sediments and surface water in Rising Pond that could be prevented by appropriate inspection, monitoring and maintenance activities for the dam. The Revised OM&M Plan for Rising Pond Dam is a revision of the current OM&M Plan, which was submitted on August 14, 2019, and approved by the EPA on August 29, 2019, and the subsequent amendment to it dated September 14, 2020, which was approved by the EPA on October 6, 2020.

GE's program for monitoring the releases of PCBs from Rising Pond Dam will be included in GE's general plans for surface water monitoring in the Rest of River, including GE's Second Revised Baseline Monitoring Plan (submitted by GE on January 30, 2023, and conditionally approved by the EPA on February 16, 2023) and future monitoring plans for the Rest of River, as approved by the EPA.

TASC Comments

Review of the Revised OM&M Plan for Rising Pond Dam indicates that this document adheres to the general requirements in the Final Revised Statement of Work and the Revised Final Permit. In addition, TASC concurrently reviewed and commented on the GZA GeoEnvironmental 2024 Rest of River Revised Operation, Monitoring and Maintenance Plan for Woods Pond Dam (Woods Pond Dam OM&M Plan). TASC found that certain issues identified in the Woods Pond Dam OM&M Plan also apply to the Revised OM&M Plan for Rising Pond Dam. TASC provides comments below that may be of interest to the community. The comments recommend possible coordination between the planned, forthcoming Revised Transportation and Disposal Plan (Revised T&D Plan) activities with possible construction activities to address the integrity of the dam, and potential releases of flood flows. In addition, comments were generated to cover the potential need for the Revised OM&M Plan for Rising Pond Dam to discuss appropriate monitoring methods that measure the effectiveness of the pond at retaining

contaminated sediments, and whether the plan should take potential climate change impacts into account.

Specific TASC comments are below.

1. The cover letter summarizing the document indicates that the Revised OM&M Plan for Rising Pond Dam and its appendices include many changes from the previous plan. A summary of the comments and associated changes from the previous document review may be of benefit to the community and provide an understanding of the concerns expressed by the EPA.

   The community may want to ask the EPA if this document can include a copy of the previous comments and associated changes to track the progress of this document.

2. The Rising Pond property is considered a feasible option for a potential rail loading area and has been retained for consideration in the sitewide scenarios described in the Revised T&D Plan for the Rest of River. This property has a significant available area that GE's railroad consultant has determined could be used for the construction of the infrastructure required to support rail/truck transport, including a rail siding or spur long enough to support the expected soil and sediment removal rates for the Rest of River Remedial Action and the associated supporting operational area. As per the Revised T&D Plan, the Rising Pond area will be occupied by significant traffic and waste materials management. The Revised OM&M Plan for Rising Pond Dam fails to mention these forthcoming activities. It seems important that the integrity of the dam and any impacts on the dam created by this increased activity should be inspected and monitored more routinely.

   The community may want to ask the EPA if the Revised OM&M Plan for Rising Pond Dam should acknowledge the forthcoming Rest of River transportation and disposal activities as they relate to Rising Pond Dam.

3. In continuation with the previous comment, it seems possible to coordinate proactive Rising Pond Dam amendments, and/or flood water control measures, with future Rest of River construction work associated with the rail loading area. The community has expressed concern associated with floodwater inundation impacts associated with dam failure. Proactive construction of dam amendments and/or flood water control features could be considered as part of the Rising Pond Rest of River construction efforts.

   The community may want to ask the EPA if there is an opportunity to ask GE to consider evaluating the flood water control measures to be constructed as part of the Rising Pond rail spur construction efforts.

4. The Revised OM&M Plan for Rising Pond Dam states the importance of the dam is to contain contaminated sediments and that GE is required to minimize the releases of PCBs from the pond by "ensuring inspection, monitoring, and maintenance" of the dam. The document provides a thorough description of routine and typical monitoring measurements that apply to the evaluation of a dam's integrity. For instance, the document describes the instrumentation relied on for monitoring, to include staff gages and observation wells (Section 3.5, pdf page 23). It seems important to monitor the goal for the pond by determining whether the impoundment contains contaminated sediments effectively. It seems appropriate to collect water quality measurements such as total suspended solids/total dissolved solids, coupled with PCB analysis of surface water samples at locations in the pond and below the outfall. The sample results in the pond and below the outfall could be compared to determine if the impoundment retains contaminated sediments successfully.

   The community may want to ask the EPA if the Revised OM&M Plan for Rising Pond Dam should include monitoring of parameters to determine if the Rising Pond Dam impoundment is achieving its goal of retaining contaminated sediments.

5. TASC has reviewed and commented on other Rest of River-related OM&M documents, including for the Columbia Mill Dam and the Willow Mill Dam. These previous documents, in addition to the Revised OM&M Plan for Rising Pond Dam and the concurrently reviewed revised Operation, Maintenance and Monitoring Plan for Woods Pond Dam lack reference to current, ongoing Rest of River activities and requirements. While these documents mention the Final Revised Statement of Work and the Revised Final Permit, they do not thoroughly describe GE's obligations or current decisions that may impact the Revised OM&M Plan for Rising Pond Dam. For instance, the Rising Pond area is a potentially important component in the Revised T&D Plan. Each of these OM&M plans is written without a thorough acknowledgment of the overarching goals to be achieved by the Rest of River remedial activities. While this is not a significant flaw in the documents, it does seem important to provide this information so that the regulatory authorities associated with dam operation, monitoring and maintenance recognize the importance of these dams to the Rest of River process. Of particular concern is the understanding that several Rest of River dams serve a 'purpose' to control and contain contaminated sediment. All dam-related regulatory agencies need to understand this purpose to eliminate any contrary management operations in the future. Furthermore, since dam maintenance requires management and removal of (potentially) contaminated sediment, the operators are now held to worker safety standards applicable to the handling of hazardous materials. This aspect is only touched on briefly in each of the dam-related OM&M documents.

   The community may want to ask the EPA if the dam-related OM&M plans should acknowledge and clearly describe the Rest of River obligations linked to the Final Revised Statement of Work and the Revised Final Permit, and to address any Rest of River Reach-specific features (such as the construction of support areas associated with

Woods Pond) that may affect Rising Pond Dam, to provide a complete understanding of the dam's purpose.

6. GE recently released the GE-Pittsfield/Housatonic River Site, Rest of River, Sustainability and Climate Adaptation Plan, which provides a conceptual understanding of how upcoming remedy efforts will accommodate potential climate change-related conditions. It seems important that the OM&M Plan also describes possible future monitoring and inspection changes that may occur as a result of climate change effects on Rising Pond Dam.

   The community may want to ask the EPA if the Revised OM&M Plan for Rising Pond Dam should incorporate an evaluation of potential climate change impacts.

7. GE provided a Qualify of Life Compliance Plan to address quality of life parameters of interest to the community (e.g., air quality, noise). GE included a 'community liaison' as part of its proposed Community Coordination and Health and Safety Program. It seems appropriate that this liaison could help monitor dam conditions and relay this information to the public. The safety of the dam is of particular interest to the community. Therefore, perhaps this person could post Rising Pond Dam status information on community information resources such as newsletters, webpages and social media.

   The community may want to ask the EPA if the community liaison could assist with the posting of Rising Pond Dam status information on a real-time basis to help the community understand ongoing conditions.

8. Section 3.1 (pdf page 19) of the Revised OM&M Plan for Rising Pond Dam describes the visual inspections to be accomplished as part of the routine monitoring program. The schedule provided follows a standard regimen of scheduled inspections. It seems important that the inspections co-occur or are coordinated to observe any impacts potentially created by the forthcoming construction of the Rising Pond rail spur activities. A significant amount of disturbance will be created by these activities that could encumber the dam and affect outfall flows (such as the release of felled trees and brush).

   The community may want to ask the EPA if the schedule of inspections for Rising Pond Dam should be increased and/or coordinated with the forthcoming rail spur construction activities.

9. Section 3.1.3 (pdf page 20) of the Revised OM&M Plan for Rising Pond Dam describes the post-storm inspection process as part of routine maintenance. It seems prudent to observe the dam before a storm to ensure flow passage is not impeded by obstructions. While it may be difficult to predict flood flows, there may be a way to coordinate observations by reviewing upgradient stream gauges or awareness of pending storm events.

   The community may want to ask the EPA if there is a method by which dam conditions can be inspected before a storm event to ensure unimpeded flood flows through the dam.

10. Section 3.5.2 (pdf page 24) of the Revised OM&M Plan for Rising Pond Dam describes the use of the five active observation wells in the raceway embankment downstream of the dam. The water levels in these wells help determine if the dam is functioning properly. This section states that "If the measurement is outside of the expected water level range, the measurement will be repeated for verification." There is no further discussion about to what steps will be taken if the repeated measurements show a continued water level change that may be of concern.

    The community may want to ask the EPA if the Revised OM&M Plan for Rising Pond Dam should describe the steps to be taken if repeated water levels from the observation wells are found to be of concern.

11. Section 4.3 (pdf page 30) of the Revised OM&M Plan for Rising Pond Dam describes the handling, management and disposition of sediments and soils, and recognizes that these materials may be characterized as hazardous waste. The handling of hazardous materials requires special training that should be acknowledged in Section 6.0 (pdf page 33) of the plan, which outlines training requirements.

    The community may want to ask the EPA if the Revised OM&M Plan for Rising Pond Dam should include the need for special training if handling of hazardous materials (contaminated sediment and/or soils) is required of the dam personnel.

12. Section 9.0 (pdf page 37) of the Revised OM&M Plan for Rising Pond Dam lists applicable references for the plan. This reference list should include the Revised Final Permit and Final Revised Statement of Work.

    The community may want to ask the EPA if the Revised OM&M Plan for Rising Pond Dam should include references for the Revised Final Permit and the Final Revised Statement of Work.

13. Appendix B (pdf page 45) of the Revised OM&M Plan for Rising Pond Dam describes the emergency response process in the event of a dam failure. Attachment A of the plan provides the inundation maps showing the possible properties and features affected by dam-released flows (pdf pages 114 through 116). It seems important to have the property owners on an emergency call list in order of spatial priority (the first property affected is the first listed) as part of the notification system (Section 2.0, Notification Flow Chart, pdf page 53).

    The community may want to ask the EPA if a property owner call list can be generated and used as part of the emergency notification system described in Appendix B.

14. Attachment A to Appendix B describes the dam break analysis results for the Rising Pond Dam as; "The simulation calculated the peak flow through the dam breach to be approximately 24,300 cfs. At Division Street, 0.9 miles downstream of the dam, this peak flow had significantly attenuated to 7,700 cfs as a result of the relatively wide

floodplain downstream of the dam…. The flood wave is contained within the river channel by 4.3 miles downstream of the dam. Therefore, the more urbanized/developed part of the Town of Great Barrington (located approximately four miles downstream of the dam on the Housatonic River) is not anticipated to be significantly inundated by the significant hazard dam breach scenario. The rapid attenuation of the flood wave is attributed to the wide floodplains in this section of the Housatonic River." (pdf page 98).

These results indicate that the wide floodplain setting is a controlling variable affecting the footprint of the inundation maps (pdf pages 114 through 116). The maps show 'islands' of land area unaffected by flood flow releases and large inundated areas immediately below the Dam outfall. This information is difficult to envision and understand. Perhaps if the topography was better delineated with the use of topographic contours, then these maps may be easier to interpret.

The community may want to ask the EPA if the inundation maps could be amended to include topographic information in order to better understand how the inundation footprint was delineated.

References Cited

Anchor QEA (Anchor QEA, LLC), AECOM and Arcadis. Final Revised Rest of River Statement of Work. Prepared for the General Electric Company. September 2021. https://semspub.epa.gov/src/document/01/659938.pdf.

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EPA. Revised Final Permit Modification to the 2016 Reissued RCRA Permit and Selection of CERCLA Remedial Action and Operation & Maintenance for Rest of River. December 2020. https://semspub.epa.gov/src/document/01/650440.pdf.

GZA GeoEnvironmental, Inc. Operation, Monitoring, and Maintenance Plan Rising Pond Dam – MA00250. Revised December 2024. https://semspub.epa.gov/src/document/01/686856.

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Technical Assistance Services *for* Communities
GE-Pittsfield/Housatonic River Site Comments on the Revised Operation, Monitoring, and Maintenance Plan for Woods Pond Dam March 3, 2025

Contract No.: 68HERH21A0018
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Technical Direction: R1 2.12.14 GE Pittsfield

Technical Assistance Services for Communities
Comments on the GE-Pittsfield/Housatonic River Site – Revised Operation, Monitoring, and Maintenance Plan for Woods Pond Dam, December 2024

Introduction

This document provides TASC comments on the 2024 GE-Pittsfield/Housatonic River – Revised Operation, Monitoring, and Maintenance Plan for Woods Pond Dam (Revised OM&M Plan for Woods Pond Dam). 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.

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conveyances, and other channels that transport water over, through, or around the dam; and (iii)… all other related activities."

Summary

The Revised OM&M Plan for Woods Pond Dam has nine sections:

Introduction and Background
Operations
Monitoring Program
Maintenance and Repairs
Emergency Response
Training
Record-Keeping and Reporting
Schedule
References

The purpose of the Revised OM&M Plan for Woods Pond Dam is to describe the procedures to be followed by GE to operate, monitor and maintain Woods Pond Dam. The overall objective is to minimize releases of PCBs in sediments and surface water in Woods Pond that could be prevented by appropriate inspection, monitoring and maintenance activities for the dam. This Revised OM&M Plan for Woods Pond Dam is a revision of the current Operation, Monitoring, and Maintenance Plan, which was submitted on June 17, 2019, and approved by the EPA on July 17, 2019, and the subsequent amendment to it dated September 4, 2020, which was approved by the EPA on September 22, 2020.

GE's program for monitoring the releases of PCBs from Woods Pond Dam is and will be included in GE's general plans for surface water monitoring in the Rest of River, including GE's Second Revised Baseline Monitoring Plan (submitted by GE on January 30, 2023, and conditionally approved by the EPA on February 16, 2023) and future monitoring plans for the Rest of River, as approved by the EPA.

TASC Comments

Review of the Revised OM&M Plan for Woods Pond Dam indicates that this document adheres to the general requirements in the Final Revised Statement of Work and the Revised Final Permit. In addition, TASC concurrently reviewed and commented on the GZA GeoEnvironmental 2024 Rest of River Revised Operation, Monitoring and Maintenance Plan for Rising Pond (Revised OM&M Plan for Rising Pond Dam). TASC provides comments below that may be of interest to the community. The comments recommend possible coordination between the planned, forthcoming Conceptual Reach 6 Remedial Design/Remedial Action Work Plan (Reach 6 RD/RA WP) activities with possible construction activities to address dam releases of flood flows. In addition, comments were generated to cover the potential need for the Revised OM&M Plan for Woods Pond Dam to discuss appropriate monitoring methods that measure the effectiveness of the pond at retaining contaminated sediments and whether the Plan should take into account potential impacts from climate change.

Specific TASC comments are:

1. Woods Pond is at a unique point in the Rest of River schedule since the Reach 6 RD/RA WP is being reviewed and revised for final design and approval. With Reach 6 RD/RA activities pending, it seems an opportune time to consider additional construction activities that may better manage Woods Pond Dam concerns. Specifically, the community has shared concerns about the inundation maps in Attachment A of Appendix B (pdf pages 110 to 116). These maps show the potential flooding created if the dam failed. Since significant RD/RA activities are forthcoming and will include substantial work in the pond and surrounding areas, this could be an opportunity to consider more construction activities that may help address dam failure concerns. Since Woods Pond serves the purpose of controlling contaminated sediments, it seems prudent for GE to consider additional measures to ensure the integrity of the dam and containment of flows and sediment releases. TASC recommends that GE could:
    - Thoroughly review the dam's integrity during Reach 6 RD/RA activities and accomplish proactive amendments if needed.
    - Review the watershed topography and identify areas to assimilate flood flows.
    - Find emergency flow routes from the dam outfall (to Valley Mill Pond as an example, since as per the Reach 6 RD/RA WP, "Water can bypass the dam via a raceway, and a portion of that bypass enters a downstream pond area, known as Valley Mill Pond, via a culvert." [pdf page 270]) to address flows.
    - Amend downgradient riverbanks with armoring to help protect private properties in the inundation footprint.

    The community may want to ask the EPA if GE should consider more dam improvements and possible flood flow controls as part of ongoing Reach 6 RD/RA activities to ensure the containment of flows and sediments into the future.

2. The Introduction (and other Sections) of the Revised OM&M Plan for Woods Pond Dam acknowledges the dam's importance and that GE is required to minimize the releases of PCBs from the Woods Pond impoundment by "ensuring inspection, monitoring, and maintenance" of the dam and impoundment. The document provides a thorough description of routine and typical monitoring measurements that apply to the evaluation of a dam's integrity. For instance, the plan describes the instrumentation relied on for monitoring, including staff gages and observation wells (Section 3.3, pdf page 22). It seems important to use monitoring to determine whether the impoundment is containing contaminated sediments effectively. It seems appropriate to collect water quality measurements such as total suspended solids/total dissolved solids, coupled with PCB analysis of surface water samples, at locations in the pond and below the outfall. The sample results from the pond and below the outfall could be compared to determine if the impoundment is retaining contaminated sediments successfully.

    The community may want to ask the EPA if the Revised OM&M Plan for Woods Pond Dam should include monitoring of parameters to determine if the Woods Pond impoundment is achieving its purpose of retaining contaminated sediments.

3. TASC has reviewed and commented on other Rest of River-related OM&M documents, including for the Columbia Mill Dam and the Willow Mill Dam. These previous documents, in addition to this Revised OM&M Plan for Woods Pond Dam and the concurrently reviewed Revised OM&M Plan for Rising Pond Dam, all lack reference to current, ongoing Rest of River activities and requirements. While these documents mention the Final Revised Statement of Work and the Revised Final Permit, they do not thoroughly describe GE's obligations or current decisions that may impact the Revised OM&M Plan for Woods Pond Dam. For instance, Woods Pond is on the cusp of a remedial action that involves the construction of support areas near the dam. It seems that each of these OM&M plans is written without a thorough acknowledgment of the overarching goals to be achieved by the Rest of River remedial activities. While this is not a significant flaw in the documents, it does seem important to provide this information so that the regulatory authorities associated with dam operation, monitoring and maintenance recognize the importance of these dams to the Rest of River process. Of particular concern is the understanding that several Rest of River dams serve a 'purpose' to control and contain contaminated sediment. All dam-related regulatory agencies need to understand this purpose to eliminate any contrary management operations in the future. Furthermore, since dam maintenance requires management and removal of (potentially) contaminated sediment, the operators are now held to worker safety standards applicable to the handling of hazardous materials. This aspect is only touched on briefly in each of the dam-related OM&M documents.

   The community may want to ask the EPA if the dam-related OM&M plans should acknowledge and clearly describe the Rest of River obligations linked to the Final Revised Statement of Work and the Revised Final Permit, and to address any Rest of River Reach-specific features (such as the construction of support areas associated with Woods Pond) that may affect Woods Pond Dam, to provide a complete understanding of the dam's purpose.

4. A town of Lenox wastewater treatment plant outfall is located along the western shore of the outlet channel. As stated in the Reach 6 RD/RA WP, GE will contact the town of Lenox to discuss the WWTP discharge to obtain more details about the treatment plant discharge that is regulated by a National Pollutant Discharge Elimination System permit, (pdf page 553 of the Reach 6 RD/RA WP). It is difficult to determine if the town of Lenox outfall is located in close proximity to Woods Pond Dam. There is no mention of the outfall in the Revised OM&M Plan for Woods Pond Dam. This may be an important feature to inventory and observe as part of dam inspections if the outfall flows can affect the dam.

   The community may want to ask the EPA if the location of the town of Lenox WWTP should be acknowledged as part of the Woods Pond Dam inspection process.

5. GE recently released the GE-Pittsfield/Housatonic River Site, Rest of River, Sustainability and Climate Adaptation Plan, which provides a conceptual understanding of how forthcoming remedy efforts will accommodate potential climate change-related conditions. It seems important that the Revised OM&M Plan for Woods Pond Dam also

describe possible future monitoring and inspection changes that may occur as a result of climate change impacts on the dam.

The community may want to ask EPA if the Revised OM&M Plan for Woods Pond Dam should incorporate an evaluation of potential climate change impacts, given that future monitoring and maintenance needs may vary given the potential impacts of climate change.

6. GE provided a Qualify of Life Compliance Plan to address quality of life parameters of interest to the community (e.g., air quality, noise). GE included a 'community liaison' as part of its proposed Community Coordination and Health and Safety Program. It seems appropriate that this liaison could help monitor dam conditions and relay this information to the public. The safety of the dam is of particular interest to the community. Therefore, perhaps this person could post Woods Pond Dam status information on community information resources such as newsletters, webpages and social media.

   The community may want to ask the EPA if the community liaison could assist with the posting of Woods Pond Dam status information on a real-time basis to help the community understand ongoing conditions.

7. Section 3.1 (pdf page 19) of the Revised OM&M Plan for Woods Pond Dam describes the visual inspections to be accomplished as part of the routine monitoring program. The schedule provided follows a standard regimen of scheduled inspections. It seems important that the inspections co-occur or are coordinated to observe any impacts potentially created by the forthcoming Reach 6 RA activities. A significant amount of disturbance will be created by these activities that could encumber the dam and affect outfall flows (such as the release of felled trees and brush or the release of aquatic macrophytes).

   The community may want to ask the EPA if the schedule of inspections for Woods Pond Dam should be increased and/or coordinated with the forthcoming Reach 6 RA activities.

8. Section 3.1.3 (pdf page 21) of the Revised OM&M Plan for Woods Pond Dam describes the post-storm inspection process as part of routine maintenance. It seems prudent to observe the dam before a storm to ensure flow passage is not impeded by obstructions. While it may be difficult to predict flood flows, there may be a way to coordinate observations by reviewing upgradient stream gauges or awareness of pending storm events.

   The community may want to ask the EPA if there is a method by which dam conditions can be inspected before a storm event to ensure unimpeded flood flows through Woods Pond Dam.

9. Section 3.3.2 (pdf page 22) of the Revised OM&M Plan for Woods Pond Dam describes the use of the three active observation wells in the raceway embankment downstream of the dam. The water levels in these wells help determine if the dam is functioning properly. This section states that "If the measurement is outside of the expected water

level range, the measurement will be repeated for verification." There is no further discussion as to what steps will be taken if the repeated measurements show a continued water level change that may be of concern.

The community may want to ask the EPA if the Revised OM&M Plan for Woods Pond Dam should describe what steps will be taken if repeated water levels from the observation wells are found to be of concern.

10. Section 4.0 (pdf page 24) of the Revised OM&M Plan for Woods Pond Dam describes the necessary maintenance and repairs required for the dam. These activities include spillway and raceway cleaning of debris and sediment and sediment removal from conveyances that interfere with the flow of water. TASC's review of the plan generated two comments on these activities:
    - Woods Pond contains an abundance of aquatic macrophytes that may pose a physical encumbrance to the proposed RD/RA sediment removal activities. As stated in the Reach 6 RD/RA WP (pdf pages 44 and 45): "Specifically, in late summer, virtually all (approximately 90%) of Woods Pond is covered with aquatic macrophytes, with approximately 75% covered with floating leaved aquatic plants." It seems that these plants may also be an issue for the function of dam features. Furthermore, TASC has raised concerns about the possible bioaccumulation of PCBs in plant tissues. If these aquatic plants are a source of 'debris' that interferes with flow of water, then they will require removal. It is unknown if these plants have accumulated enough PCBs to, in turn, be characterized as hazardous waste.
    - The necessary sediment removal that needs to be accomplished for continued dam maintenance could be timed to coordinate with ongoing Reach 6 RD/RA activities. This coordination may ensure the proper disposal of the contaminated sediments in a cost-effective manner.

    The community may want to ask the EPA if the debris removed from the spillway and raceway would be considered a waste to be managed, and if the sediment removal that is planned as part of dam maintenance could be coordinated with Reach 6 RD/RA efforts to achieve an effective disposal.

11. Section 4.1 (pdf page 24) of the Revised OM&M Plan for Woods Pond Dam describes the routine maintenance and repair activities to be conducted. Standard maintenance may require activities such as vegetative cutting from raceway embankment areas. As previously mentioned, there are Reach 6 RD/RA activities planned, and these activities may benefit from the use of any cleared vegetation to be used for reclamation, if needed.

    The community may want to ask the EPA if vegetation clearing from dam maintenance could be of benefit to any of the proposed Reach 6 RD/RA efforts.

12. Section 4.3 (pdf page 27) of the Revised OM&M Plan for Woods Pond Dam describes the handling, management and disposition of sediments and soils, and recognizes that these materials may be characterized as hazardous waste. The handling of hazardous

materials requires special training, which should be acknowledged in Section 6.0 (pdf page 29) of the plan, which outlines training requirements.

The community may want to ask the EPA if the Revised OM&M Plan for Woods Pond Dam should include the need for special training if handling of hazardous materials (contaminated sediment and/or soils) by dam personnel is required.

13. Section 9.0 (pdf page 32) of the Revised OM&M Plan for Woods Pond Dam lists applicable references for the document. This reference list should include the Revised Final Permit and the Final Revised Statement of Work.

    The community may want to ask the EPA if the Revised OM&M Plan for Woods Pond Dam should include references for the Revised Final Permit and the Final Revised Statement of Work.

14. Appendix B (pdf page 40) of the Revised OM&M Plan for Woods Pond Dam describes the emergency response process in the event of dam failure. Attachment A provides the inundation maps showing the possible properties and features affected by dam-released flows. It seems important to have the property owners on an emergency call list in order of spatial priority (the first property affected is the first listed) as part of the notification system (Section 2.0, Notification Flow Chart, pdf page 48).

    The community may want to ask the EPA if a property owner call list can be generated and used as part of the emergency notification system described in Appendix B.

15. Section 7.8 of Attachment E of Appendix B of the Revised OM&M Plan for Woods Pond Dam describes the public awareness and communication process. As stated on pdf page 72:

    "Note that the inundation maps available in Attachment E include a limited number of key landmarks within the impact area and present estimated flood zones. However, the maps do not include all possible structures and facilities that may be impacted due to a dam break of Woods Pond Dam. It is incumbent upon the towns of Lenox, Lee and Stockbridge to locate key local landmarks and modify the inundation maps, as they deem appropriate." The community has expressed concern about the projected inundation footprint and should be allowed time to thoroughly review and identify the key local landmarks that could be affected.

    The community may request more time from the EPA to thoroughly review and document the key local landmarks potentially impacted by the inundation footprint shown in Attachment E.

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