Public Input on General Electric's Road Assessment Work Plan, dated June 26, 2025

June 2025 - July 2025

Public Input ended on July 30, 2025

SEMS Doc ID 693676

CITY OF PITTSFIELD
Department of Public Works – Engineering Division 70 Allen Street Pittsfield, MA (413) 499-9327

To: U.S. Environmental Protection Agency, New England Region

From: The City of Pittsfield Department of Public Works

Date: July 30, 2025

Re: Housatonic Rest of River (GECD850) Road Assessment Work Plan

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Comments on the Road Assessment Work Plan

Below are the City's comments pertaining to the contents in the road assessment work plan developed by Arcadis for General Electric Company dated June 2025.

1. In the interest of transparency, The City of Pittsfield is making it know to the U.S. Environmental Protection Agency and General Electric Company that the city has and is continuing contracted services with citylogix (f/k/a StreetScan) for road data collection which includes pavement condition indexes for city streets.
2. Specifically, what is being included under "Infrastructure" for the assessments (bridges, culverts, utility structures, etc.)?
    a. The city would like to be present for the inspection of the small culverts on Holmes Road and East New Lenox Road.
3. The Massachusetts Department of Transportation owns the railroad bridge on Holmes Road in Pittsfield; they should receive the pre and post condition assessment for that structure.
4. Will preconstruction assessments be delayed or advanced if there are changes to the timing of a construction phase? The schedule included in the report is not rigid, but the anticipated schedule.

Comments on Condition of Infrastructure in Pittsfield

1. Pomeroy Avenue (Preston to Holmes Road)
    a. Single segment PCI 84
2. Pomeroy Avenue – City Bridge P-10-023 (Between Preston Avenue and Holmes Road)
    a. Last inspected by DOT on 10-24-2023
    b. Deck Condition: Good
    c. Superstructure: Good
    d. Substructure: Good
    e. Channel and Channel Protection: Good
3. Holmes Road (Pomeroy to Lenox TL)
    a. Pomeroy to R.R. Bridge ~ 0.7 miles
        i. Paved in 2024
    b. From R.R. Bridge to Lenox TL ~ 1.1 miles
        i. PCI range 50-70
4. Utility Drive
    a. Not included in Road Data Collection
    b. Poor condition with deep ruts along the length
    c. Private rail crossing, owned by the city, has view obscured by wooden ties looking north and overgrowth to the south.
    d. Road subbase is potentially unsuitable for increase in heavy construction vehicles.
        i. Based on record drawings road is 2.5” – 3” HMA, 3” crushed stone base, and 12” gravel subbase, over sandy loam native soils.
5. East New Lenox Road
    a. Crack and fog sealed in 2024
    b. PCI ranges 80-95
6. P-10-055 Sackett Brook Culvert
    a. Last inspected 02-28-2024
    b. New construction completed in Summer 2024
        i. Excellent condition
7. Small drainage culverts
    a. 3 Holmes Road
    b. 3 East New Lenox Road

STRUCTURES INSPECTION FIELD REPORT

ROUTINE INSPECTION

2-DIST	B.I.N.	BR. DEPT. NO.
01	01R	P-10-023

CITY/TOWN	8.-STRUCTURE NO.	11-Kilo. POINT	41-STATUS	90-ROUTINE INSP. DATE
PITTSFIELD	P10023-01R-MUN-NBI	000.000	A:OPEN	OCT 24, 2023

07-FACILITY CARRIED	MEMORIAL NAME/LOCAL NAME	27-YR BUILT	106-YR REBUILT	YR REHAB'D (NON 106)
HWY POMEROY AVE		1936	1993	0000

06-FEATURES INTERSECTED	26-FUNCTIONAL CLASS	DIST. BRIDGE INSPECTION ENGINEER
WATER E BR HOUSATONIC R	Urban Collector	L. A. Briggs

43-STRUCTURE TYPE	22-OWNER	21-MAINTAINER	TEAM LEADER R. Mancari
302 : Steel Stringer/Girder	City/ Municipal Highway A	City/ Municipal Highway A	

107-DECK TYPE	WEATHER	TEMP. (air)	TEAM MEMBERS
1 : Concrete Cast-in-Place	Sunny	14°C	M. RANZONI

ITEM 58 — DECK: 7

		DEF
1.Wearing Surface	7	-
2.Deck Condition	7	-
3.Stay in place forms	8	-
4.Curbs	7	-
5.Median	N	-
6.Sidewalks	7	-
7.Parapets	N	-
8.Railing	6	-
9.Anti Missile Fence	N	-
10.Drainage System	N	-
11.Lighting Standards	N	-
12.Utilities	6	-
13.Deck Joints	6	-
14.	N	-
15.	N	-
16.	N	-

CURB REVEAL (In millimeters)	N	S
	190	160

APPROACHES

		DEF
a. Appr. Pavement Condition	7	-
b. Appr. Roadway Settlement	8	-
c. Appr. Sidewalk Settlement	6	M-P
d.	N	-

OVERHEAD SIGNS (Attached to bridge) (Y/N): N

		DEF
a. Condition of Welds	N	-
b. Condition of Bolts	N	-
c. Condition of Signs	N	-

ITEM 59 — SUPERSTRUCTURE: 7

		DEF
1.Stringers	N	-
2.Floorbeams	N	-
3.Floor System Bracing	N	-
4.Girders or Beams	7	-
5.Trusses - General	N	-
a. Upper Chords	N	-
b. Lower Chords	N	-
c. Web Members	N	-
d. Lateral Bracing	N	-
e. Sway Bracings	N	-
f. Portals	N	-
g. End Posts	N	-
6.Pin & Hangers	N	-
7.Conn Plt's, Gussets & Angles	8	-
8.Cover Plates	8	-
9.Bearing Devices	8	-
10.Diaphragms/Cross Frames	8	-
11.Rivets & Bolts	8	-
12.Welds	7	-
13.Member Alignment	8	-
14.Paint/Coating	7	-
15.	N	-

Year Painted	1993

COLLISION DAMAGE: *Please explain*
None (X) Minor ( ) Moderate ( ) Severe ( )

LOAD DEFLECTION: *Please explain*
None (X) Minor ( ) Moderate ( ) Severe ( )

LOAD VIBRATION: *Please explain*
None (X) Minor ( ) Moderate ( ) Severe ( )

Any Fracture Critical Member: **(Y/N)** N

Any Cracks: **(Y/N)** N

ITEM 60 — SUBSTRUCTURE: 7

	Dive	Cur		DEF
1. Abutments			7	
a. Pedestals	N	N		-
b. Bridge Seats	N	7		-
c. Backwalls	N	7		M-P
d. Breastwalls	N	7		-
e. Wingwalls	N	7		-
f. Slope Paving/Rip-Rap	N	8		-
g. Pointing	N	N		-
h. Footings	N	H		-
i. Piles	N	H		-
j. Scour	N	8		-
k. Settlement	N	7		-
l.	N	N		-
m.	N	N		-
2. Piers or Bents			N	
a. Pedestals	N	N		-
b. Caps	N	N		-
c. Columns	N	N		-
d. Stems/Webs/Pierwalls	N	N		-
e. Pointing	N	N		-
f. Footing	N	N		-
g. Piles	N	N		-
h. Scour	N	N		-
i. Settlement	N	N		-
j.	N	N		-
k.	N	N		-
3. Pile Bents			N	
a. Pile Caps	N	N		-
b. Piles	N	N		-
c. Diagonal Bracing	N	N		-
d. Horizontal Bracing	N	N		-
e. Fasteners	N	N		-

UNDERMINING (Y/N) If YES please explain: N

COLLISION DAMAGE:
None (X) Minor ( ) Moderate ( ) Severe ( )

SCOUR: *Please explain*
None (X) Minor ( ) Moderate ( ) Severe ( )

I-60 (Dive Report): N ***I-60 (This Report):*** 7

93B-U/W (DIVE) Insp 00/00/0000

X=UNKNOWN N=NOT APPLICABLE H=HIDDEN/INACCESSIBLE R=REMOVED

CITY/TOWN	B.I.N.	BR. DEPT. NO.	8.-STRUCTURE NO.	INSPECTION DATE
PITTSFIELD	01R	P-10-023	P10023-01R-MUN-NBI	OCT 24, 2023

ITEM 61 — CHANNEL & CHANNEL PROTECTION — 7

	Dive	Cur	DEF
1.Channel Scour	N	7	-
2.Embankment Erosion	N	8	-
3.Debris	N	8	-
4.Vegetation	N	8	-
5.Utilities	N	N	-
6.Rip-Rap/Slope Protection	N	8	-
7.Aggradation	N	8	-
8.Fender System	N	N	-

STREAM FLOW VELOCITY:
Tidal ( ) High ( ) Moderate ( ) Low (X) None ( )

ITEM 61 (Dive Report): N ***ITEM 61 (This Report):*** 7

93b-U/W INSP. DATE: 00/00/0000

ITEM 36 — *TRAFFIC SAFETY*

	36	COND	DEF
A. Bridge Railing	0	6	-
B. Transitions	0	8	-
C. Approach Guardrail	0	7	-
D. Approach Guardrail Ends	0	8	-

WEIGHT POSTING

Not Applicable X

	H	3	3S2	Single
Actual Posting	N	N	N	N
Recommended Posting	N	N	N	N

Waived Date: 00/00/0000 **EJDMT Date:** 00/00/0000

	At bridge E	At bridge W	Other Advance E	Other Advance W
Signs In Place (Y=Yes,N=No, NR=NotRequired)				
Legibility/ Visibility				

CLEARANCE POSTING

Not X
Actual Field Measurement
Posted Clearance

	N ft	N in	S ft	S in	meter
Actual Field Measurement		0		0	
Posted Clearance		0		0	

	At bridge N	At bridge S	Advance N	Advance S
Signs In Place (Y=Yes,N=No, NR=Not Required)				
Legibility/ Visibility				

ACCESSIBILITY (Y/N/P)

	Needed	Used
Lift Bucket	N	N
Ladder	N	N
Boat	N	N
Waders	N	N
Inspector 50	Y	Y
Rigging	N	N
Staging	N	N
Traffic Control	Y	Y
RR Flagger	N	N
Police	Y	Y
Other:		
	N	N

TOTAL HOURS 8

PLANS (Y/N): Y

(V.C.R.) (Y/N): N

TAPE#: _____

List of field tests performed:

RATING

Rating Report (Y/N): Y

Date: 10/01/2002

Inspection data at time of existing rating
I 58: **8** I 59: **8** I 60: **7** Date : 10/10/2001

Recommend for Rating or Rerating (Y/N): N

If YES please give priority: HIGH ( ) MEDIUM ( ) LOW ( )

REASON: _____

CONDITION RATING GUIDE (For Items 58, 59, 60 and 61)

	CODE	CONDITION	DEFECTS
	N	NOT APPLICABLE	
G	9	EXCELLENT	Excellent condition.
G	8	VERY GOOD	No problem noted.
G	7	GOOD	Some minor problems.
F	6	SATISFACTORY	Structural elements show some minor deterioration.
F	5	FAIR	All primary structural elements are sound but may have minor section loss, cracking, spalling or scour.
P	4	POOR	Advanced section loss, deterioration, spalling or scour.
P	3	SERIOUS	Loss of section, deterioration, spalling or scour have seriously affected primary structural components. Local failures are possible. Fatigue cracks in steel or shear cracks in concrete may be present.
C	2	CRITICAL	Advanced deterioration of primary structural elements. Fatigue cracks in steel or shear cracks in concrete may be present or scour may have removed substructure support. Unless closely monitored it may be necessary to close the bridge until corrective action is taken.
C	1	"IMMINENT" FAILURE	Major deterioration or section loss present in critical structural components or obvious vertical or horizontal movement affecting structure stablility. Bridge is closed to traffic but corrective action may put it back in light service.
	0	FAILED	Out of service - beyond corrective action.

DEFICIENCY REPORTING GUIDE

DEFICIENCY: A defect in a structure that requires corrective action.

CATEGORIES OF DEFICIENCIES:

M= Minor Deficiency - Deficiencies which are minor in nature, generally do not impact the structural integrity of the bridge and could easily be repaired. Examples include but are not limited to: Spalled concrete, Minor pot holes, Minor corrosion of steel, Minor scouring, Clogged drainage, etc.

S= Severe/Major Deficiency - Deficiencies which are more extensive in nature and need more planning and effort to repair. Examples include but are not limited to: Moderate to major deterioration in concrete, Exposed and corroded rebars, Considerable settlement, Considerable scouring or undermining, Moderate to extensive corrosion to structural steel with measurable loss of section, etc.

C-S= Critical Structural Deficiency - A deficiency in a structural element of a bridge that poses an extreme unsafe condition due to the failure or imminent failure of the element which will affect the structural integrity of the bridge.

C-H= Critical Hazard Deficiency - A deficiency in a component or element of a bridge that poses an extreme hazard or unsafe condition to the public, but does not impair the structural integrity of the bridge. Examples include but are not limited to: Loose concrete hanging down over traffic or pedestrians, A hole in a sidewalk that may cause injuries to pedestrians, Missing section of bridge railing, etc.

URGENCY OF REPAIR:

I = Immediate- [Inspector(s) immediately contact District Bridge Inspection Engineer (DBIE) to report the Deficiency and to receive further instruction from him/her].

A = ASAP- [Action/Repair should be initiated by District Maintenance Engineer or the Responsible Party (if not a State owned bridge) upon receipt of the Inspection Report].

P = Prioritize- [Shall be prioritized by District Maintenance Engineer or the Responsible Party (if not a State owned bridge) and repairs made when funds and/or manpower is available].

CITY/TOWN	B.I.N.	BR. DEPT. NO.	8.-STRUCTURE NO.	INSPECTION DATE
PITTSFIELD	01R	P-10-023	P10023-01R-MUN-NBI	OCT 24, 2023

REMARKS

BRIDGE ORIENTATION
Pomeroy Avenue travels west and east. The East Branch of the Housatonic River flows from north to south. This single span structure consists of seven weathering steel beams with welded cover plates supporting a reinforced concrete deck with an asphalt wearing surface. The beams and bays are numbered from north to south, upstream to downstream, in accordance with the plans. See photos 1 & 2.

ITEM 58 - DECK

Item 58.1 - Wearing Surface
At the east deck joint, the wearing surface is pulling away from the armor, with cracking and patches. See photo 3.

Item 58.2 - Deck Condition
Both deck overhangs have randomly spaced transverse hairline cracks with efflorescence that extend up the fascias.

All bays have stay in place forms. See photo 2.

Item 58.4 - Curbs
In the south curb, all of the masonry joints have minor vegetation.

In the north curb, between the curb and sidewalk, there is a moderate amount of vegetation. See photo 4.

The southwest and northeast approach curbs are tipped toward the roadway, up to 2".

Item 58.6 - Sidewalks
The both sidewalks have longitudinal and transverse hairline cracks.

The north sidewalk, adjacent to the curb, has scaled areas, full length x up to 2" wide x 1" deep, with light vegetation growth. See photo 4.

Both sidewalk fascias have vertical hairline cracks that line up with cracks in the deck overhangs.

Item 58.8 - Railing
North Railing
The top rail has several minor dents, full length.

The 4th panel from the west has several balusters with minor damage.

The east end post, around the bottom rail, has a scaled area, 10" wide x 6" high x 2" deep.

South Railing
The 6th panel from the west has balusters that are not fully secured.

Item 58.12 - Utilities
In bay 1, the second bracket from the west is severely rusted with holes throughout the web. The utility is located directly under a set of deck weeps. See photo 5.

In bay 1, the water main insulation has been repaired.

CITY/TOWN	B.I.N.	BR. DEPT. NO.	8.-STRUCTURE NO.	INSPECTION DATE
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REMARKS

Item 58.13 - Deck Joints
The east deck joint is filled with sand and debris. See photo 3.

At the east deck joint, the steel headers have minor gouges, up to 4" wide x 1/2" deep, due to plow damage.

APPROACHES

Approaches a - Appr. Pavement Condition
At the east deck joint, the approach pavement is pulling away from the armor, with cracking and patches. See photo 3.

Approaches c - Appr. Sidewalk Settlement
The southeast corner is settled, 2".

The southwest corner is settled, 2". The approach walkway in this area is dirt / grass. See photo 6.

ITEM 59 - SUPERSTRUCTURE

Item 59.4 - Girders or Beams
Beam 1, at the east end, has minor laminating rust in the painted section near the bottom flange, 6' long. See photo 7.

Beams 1 & 2, at the west end, have laminated rust on the bottom flanges, up to 5' long, due to leakage from the deck weeps.

Item 59.9 - Bearing Devices
At the east abutment, the sliding plate bearings are in expansion toward the backwall, approximately 1" past center.

Item 59.12 - Welds
At the east end of beam 1, the cover plate welds have rust with delamination. See photo 7.

Item 59.13 - Member Alignment
Refer to Item 59.9 - Bearing Devices.

Item 59.14 - Paint/Coating
The weathering steel beams have regular dark patina.

The beam ends are painted.

Beam 1, at the east end, mostly along the bottom of the web, has peeling in the paint and patina failure, 6' long. See photo 7.

ITEM 60 - SUBSTRUCTURE

Item 60.1 - Abutments
Item 60.1.b - Bridge Seats
The west seat, at the north end, has a large amount of standing water and active leakage.

Refer to Item 60.1.d - Breastwalls.

CITY/TOWN	B.I.N.	BR. DEPT. NO.	8.-STRUCTURE NO.	INSPECTION DATE
PITTSFIELD	01R	P-10-023	P10023-01R-MUN-NBI	OCT 24, 2023

REMARKS

Item 60.1.c - Backwalls
At both backwalls, in bay 1 around the utility pipe, the bricks and mortar are deteriorated. Fill from below the approach sidewalks is spilling through in these areas. See photo 5.

East Backwall
In bays 2 - 4 & 6, there are full height vertical hairline cracks with efflorescence.

Bay 4 has a full height vertical crack, 1/16" wide.

Bay 5 has two vertical hairline cracks.

West Backwall
Bays 2, 3, 5, & 6 have full height vertical hairline cracks with efflorescence.

Bay 4 has two vertical hairline cracks with efflorescence.

Item 60.1.d - Breastwalls
Both sides, in all bays, have vertical cracks in the newer sections, 1/16" wide x 3' high. These cracks are near the steps in the seats.

The east breastwall, near the south drain pipe, has a scaled area, 1' diameter x 1" deep.

The east breastwall, at the north end, has a full length horizontal hairline crack with efflorescence at the pour joint and hairline mapcracking, 12' long.

Item 60.1.e - Wingwalls
The northeast wingwall has moderate mapcracking with efflorescence. At the end of the wingwall, the top is scaled 8' long x full width x 4" deep.

The southeast wingwall is scaled at the top, 4' long x 18" high x 1" deep, 6' from the breastwall.

Item 60.1.h - Footings
The footings are hidden by design.

Item 60.1.i - Piles
The piles are hidden by design.

TRAFFIC SAFETY

Item 36a - Bridge Railing
The bridge railings consist of type AL-3 aluminum rails, with balusters, tied into the tapered concrete end posts and mounted on the sidewalks. Refer to Item 58.8 - Railing.

Item 36b - Transitions
The transitions consist of nested steel W-beam panels tied into the concrete end posts and mounted on steel posts with steel blockouts, spaced at 3'.

Item 36c - Approach Guardrail
The approach guardrails consist of single steel W-beam panels mounted on steel posts with steel blockouts, spaced at 6'.

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PITTSFIELD	**01R**	**P-10-023**	**P10023-01R-MUN-NBI**	**OCT 24, 2023**

REMARKS

The northeast approach guardrail has minor damage to one panel.

Item 36d - Approach Guardrail Ends

The southwest and northeast approach guardrails have buried ends, swept from traffic.

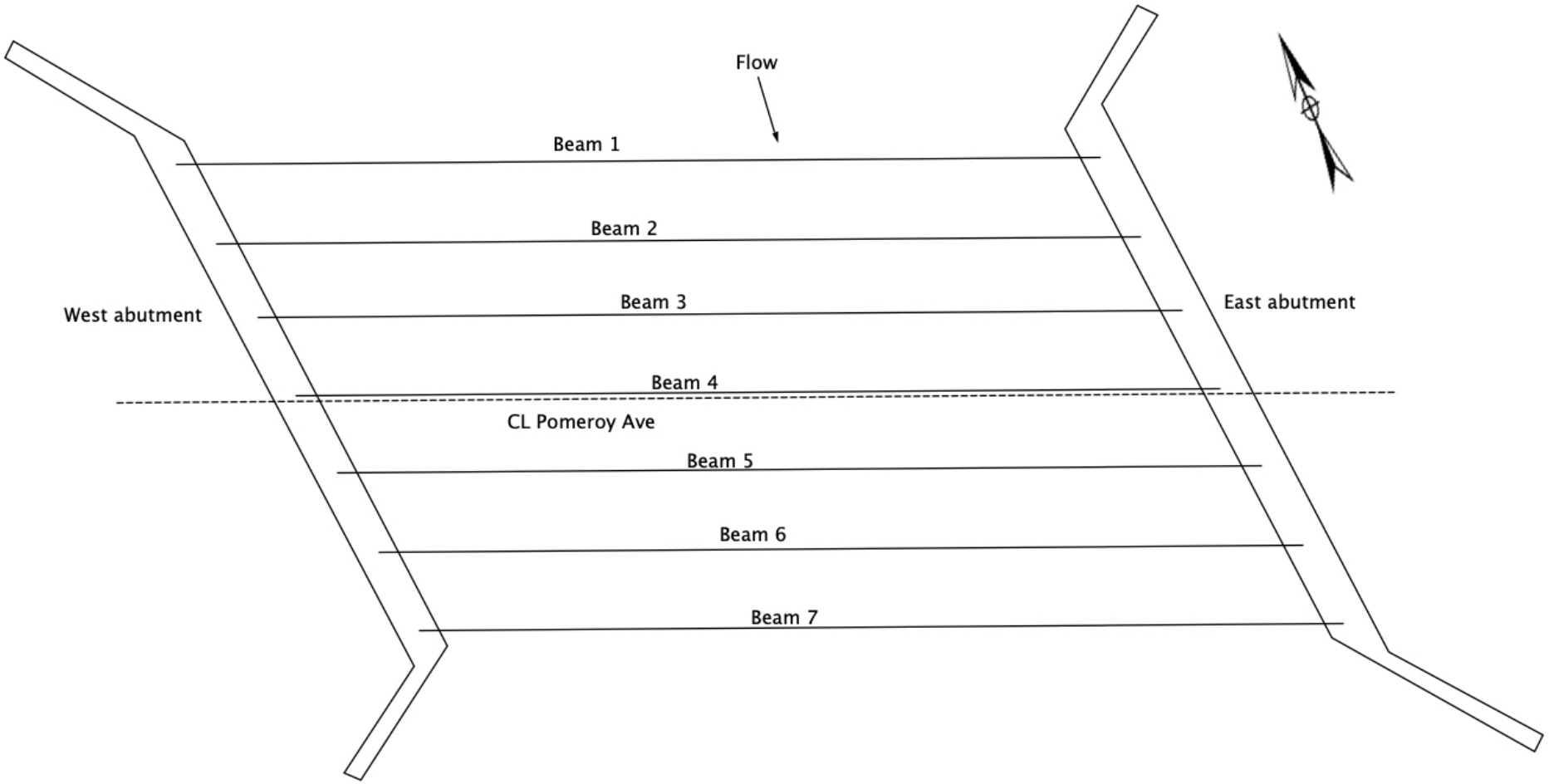
The southeast and northwest approach guardrails have steel terminal ends, swept from traffic.

Sketch / Chart / Photo Log

Sketch 1 : Framing plan.
Chart 1 : Channel profile readings.
Photo 1 : General topside, looking west.
Photo 2 : Typical underside, looking east.
Photo 3 : East deck joint filled with sand and debris. Note the approach pavement pulling away from the armor and patches.
Photo 4 : Vegetation growing between the north sidewalk and curb.
Photo 5 : Rusted utility support at the west end of bay 1. Also, note the fill spilling through the utility bay in the backwall.
Photo 6 : Approach sidewalk settlement at the west end of the south sidewalk.
Photo 7 : Rusting with delamination at the east end of beam 1. Also, note the delamination in the cover plate and the associated welds.

CITY/TOWN	B.I.N.	BR. DEPT. NO.	8.-STRUCTURE NO.	INSPECTION DATE
PITTSFIELD	**01R**	**P-10-023**	**P10023-01R-MUN-NBI**	**OCT 24, 2023**

SKETCHES



Sketch 1: Framing plan.

CITY/TOWN	B.I.N.	BR. DEPT. NO.	8.-STRUCTURE NO.	INSPECTION DATE
PITTSFIELD	**01R**	**P-10-023**	**P10023-01R-MUN-NBI**	**OCT 24, 2023**

CHARTS

D01006 Channel Profile Readings										
	South Fascia					North Fascia				
DATE	**West Abutment**	**1/4 span**	**1/2 span**	**3/4 span**	**East Abutment**	**West Abutment**	**1/4 span**	**1/2 span**	**3/4 span**	**East Abutment**
10/5/23	8.8	15.8	18.0	18.0	11.3	10.0	15.3	18.0	16.3	12.0

NOTES:
*All readings in decimal feet.

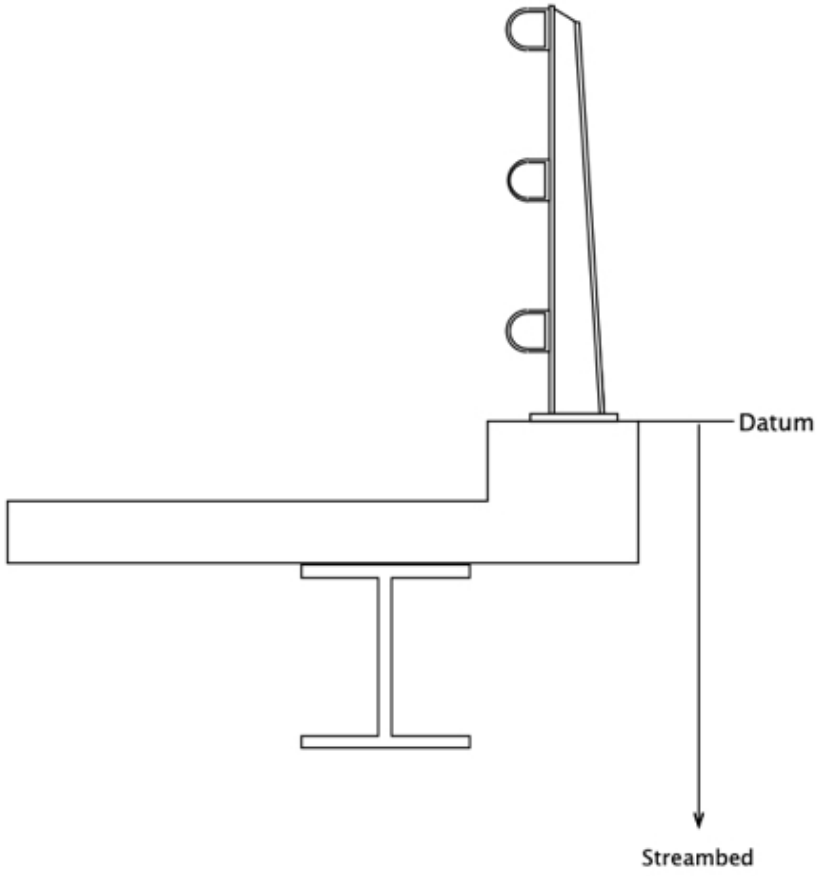


Chart 1: Channel profile readings.

CITY/TOWN	B.I.N.	BR. DEPT. NO.	8.-STRUCTURE NO.	INSPECTION DATE
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PHOTOS

Photo 1: General topside, looking west.

Photo 2: Typical underside, looking east.

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PHOTOS

Photo 3: East deck joint filled with sand and debris. Note the approach pavement pulling away from the armor and patches.

Photo 4: Vegetation growing between the north sidewalk and curb.

CITY/TOWN	B.I.N.	BR. DEPT. NO.	8.-STRUCTURE NO.	INSPECTION DATE
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PHOTOS

Photo 5: **Rusted utility support at the west end of bay 1. Also, note the fill spilling through the utility bay in the backwall.**

Photo 6: **Approach sidewalk settlement at the west end of the south sidewalk.**

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PHOTOS

Photo 7: **Rusting with delamination at the east end of beam 1. Also, note the delamination in the cover plate and the associated welds.**

STRUCTURES INSPECTION FIELD REPORT

ROUTINE INSPECTION

2-DIST	B.I.N.	BR. DEPT. NO.
01	C53	P-10-055

CITY/TOWN	8.-STRUCTURE NO.	11-Kilo. POINT	41-STATUS	90-ROUTINE INSP. DATE
PITTSFIELD	P10055-C53-MUN-DES	000.000	D:OPEN	FEB 28, 2024

07-FACILITY CARRIED	MEMORIAL NAME/LOCAL NAME	27-YR BUILT	106-YR REBUILT	YR REHAB'D (NON 106)
HWY E NEW LENOX		2023	0000	0000

06-FEATURES INTERSECTED	26-FUNCTIONAL CLASS	DIST. BRIDGE INSPECTION ENGINEER L. A. Briggs
WATER SACKETT BROOK	Urban Local	Michael PE McCabe for LAB

43-STRUCTURE TYPE	22-OWNER	21-MAINTAINER	TEAM LEADER R. Mancari
506 : Prestressed Concrete Box Beam or Girders - Single or Spread	City/ Municipal Highway A	City/ Municipal Highway A	Reed Mancari

107-DECK TYPE	WEATHER	TEMP. (air)	TEAM MEMBERS
1 : Concrete Cast-in-Place	Rain	7°C	M. RANZONI Matthew Ranzoni

ITEM 58 — DECK — 9

		DEF
1.Wearing Surface	9	-
2.Deck Condition	9	-
3.Stay in Place Forms	9	-
4.Curbs	9	-
5.Median	N	-
6.Sidewalks	N	-
7.Parapets	N	-
8.Railing	9	-
9.Anti Missile Fence	N	-
10.Drainage System	N	-
11.Lighting Standards	N	-
12.Utilities	9	-
13.Deck Joints	N	-
14.	N	-
15.	N	-
16.	N	-

CURB REVEAL (In millimeters)	E	W
	N	200

APPROACHES

		DEF
a. Appr. Pavement Condition	9	-
b. Appr. Roadway Settlement	9	-
c. Appr. Sidewalk Settlement	N	-
d.	N	-

OVERHEAD SIGNS (Attached to bridge) (Y/N) N

		DEF
a. Condition of Welds	N	-
b. Condition of Bolts	N	-
c. Condition of Signs	N	-

ITEM 59 — SUPERSTRUCTURE — 9

		DEF
1.Stringers	N	-
2.Floorbeams	N	-
3.Floor System Bracing	N	-
4.Girders or Beams	9	-
5.Trusses - General	N	-
a. Upper Chords	N	-
b. Lower Chords	N	-
c. Web Members	N	-
d. Lateral Bracing	N	-
e. Sway Bracings	N	-
f. Portals	N	-
g. End Posts	N	-
6.Pin & Hangers	N	-
7.Conn Plt's, Gussets & Angles	N	-
8.Cover Plates	N	-
9.Bearing Devices	N	-
10.Diaphragms/Cross Frames	9	-
11.Rivets & Bolts	N	-
12.Welds	N	-
13.Member Alignment	N	-
14.Paint/Coating	N	-
15.	N	-

Year Painted	N

COLLISION DAMAGE: *Please explain*
None (X) Minor ( ) Moderate ( ) Severe ( )

LOAD DEFLECTION: *Please explain*
None (X) Minor ( ) Moderate ( ) Severe ( )

LOAD VIBRATION: *Please explain*
None (X) Minor ( ) Moderate ( ) Severe ( )

Any Fracture Critical Member: (Y/N) N

Any Cracks: (Y/N) N

ITEM 60 — SUBSTRUCTURE — 9

	Dive	Cur		DEF
1. Abutments			9	
a. Pedestals	N	N		-
b. Bridge Seats	N	N		-
c. Backwalls	N	N		-
d. Breastwalls	N	9		-
e. Wingwalls	N	9		-
f. Slope Paving/Rip-Rap	N	9		-
g. Pointing	N	N		-
h. Footings	N	H		-
i. Piles	N	H		-
j. Scour	N	9		-
k. Settlement	N	9		-
l.	N	N		-
m.	N	N		-
2. Piers or Bents			N	
a. Pedestals	N	N		-
b. Caps	N	N		-
c. Columns	N	N		-
d. Stems/Webs/Pierwalls	N	N		-
e. Pointing	N	N		-
f. Footing	N	N		-
g. Piles	N	N		-
h. Scour	N	N		-
i. Settlement	N	N		-
j.	N	N		-
k.	N	N		-
3. Pile Bents			N	
a. Pile Caps	N	N		-
b. Piles	N	N		-
c. Diagonal Bracing	N	N		-
d. Horizontal Bracing	N	N		-
e. Fasteners	N	N		-

UNDERMINING (Y/N) If YES please explain N

COLLISION DAMAGE:
None (X) Minor ( ) Moderate ( ) Severe ( )

SCOUR: *Please explain*
None (X) Minor ( ) Moderate ( ) Severe ( )

I-60 (Dive Report): N *I-60 (This Report):* 9

93B-U/W (DIVE) Insp 00/00/0000

X=UNKNOWN N=NOT APPLICABLE H=HIDDEN/INACCESSIBLE R=REMOVED

CITY/TOWN	B.I.N.	BR. DEPT. NO.	8.-STRUCTURE NO.	INSPECTION DATE
PITTSFIELD	C53	P-10-055	P10055-C53-MUN-DES	FEB 28, 2024

ITEM 61 — CHANNEL & CHANNEL PROTECTION — 9

	Dive	Cur	DEF
1.Channel Scour	N	9	-
2.Embankment Erosion	N	9	-
3.Debris	N	9	-
4.Vegetation	N	9	-
5.Utilities	N	N	-
6.Rip-Rap/Slope Protection	N	9	-
7.Aggradation	N	9	-
8.Fender System	N	N	-

STREAM FLOW VELOCITY:
Tidal ( ) High ( ) Moderate ( ) Low (X) None ( )

ITEM 61 (Dive Report): N **ITEM 61 (This Report):** 9

93b-U/W INSP. DATE: 00/00/0000

ITEM 36 — TRAFFIC SAFETY

	36	COND	DEF
A. Bridge Railing	0	9	-
B. Transitions	0	N	-
C. Approach Guardrail	0	N	-
D. Approach Guardrail Ends	0	N	-

WEIGHT POSTING

Not Applicable X

	H	3	3S2	Single
Actual Posting	N	N	N	N
Recommended Posting	N	N	N	N

Waived Date: 00/00/0000 **EJDMT Date:** 00/00/0000

	At bridge N	At bridge S	Other Advance N	Other Advance S
Signs In Place (Y=Yes,N=No, NR=NotRequired)				
Legibility/ Visibility				

CLEARANCE POSTING

Not X
Actual Field Measurement
Posted Clearance

	E ft	E in	W ft	W in	meter
Actual Field Measurement		0		0	
Posted Clearance		0		0	

	At bridge E	At bridge W	Advance E	Advance W
Signs In Place (Y=Yes,N=No, NR=Not Required)				
Legibility/ Visibility				

ACCESSIBILITY (Y/N/P)

	Needed	Used
Lift Bucket	N	N
Ladder	N	N
Boat	N	N
Waders	P	N
Inspector 50	N	N
Rigging	N	N
Staging	N	N
Traffic Control	N	N
RR Flagger	N	N
Police	N	N
Other:		

TOTAL HOURS 8

PLANS (Y/N): Y

(V.C.R.) (Y/N): N

TAPE#: _____

List of field tests performed:

RATING

Rating Report (Y/N): N

Date: 00/00/0000

Inspection data at time of existing rating
I 58: - I 59: - I 60: - Date : 00/00/0000

Recommend for Rating or Rerating (Y/N): N

If YES please give priority: HIGH ( ) MEDIUM ( ) LOW ( )

REASON: _____

CONDITION RATING GUIDE (For Items 58, 59, 60 and 61)

	CODE	CONDITION	DEFECTS
	N	NOT APPLICABLE	
G	9	EXCELLENT	Excellent condition.
G	8	VERY GOOD	No problem noted.
G	7	GOOD	Some minor problems.
F	6	SATISFACTORY	Structural elements show some minor deterioration.
F	5	FAIR	All primary structural elements are sound but may have minor section loss, cracking, spalling or scour.
P	4	POOR	Advanced section loss, deterioration, spalling or scour.
P	3	SERIOUS	Loss of section, deterioration, spalling or scour have seriously affected primary structural components. Local failures are possible. Fatigue cracks in steel or shear cracks in concrete may be present.
C	2	CRITICAL	Advanced deterioration of primary structural elements. Fatigue cracks in steel or shear cracks in concrete may be present or scour may have removed substructure support. Unless closely monitored it may be necessary to close the bridge until corrective action is taken.
C	1	"IMMINENT" FAILURE	Major deterioration or section loss present in critical structural components or obvious vertical or horizontal movement affecting structure stablility. Bridge is closed to traffic but corrective action may put it back in light service.
	0	FAILED	Out of service - beyond corrective action.

DEFICIENCY REPORTING GUIDE

DEFICIENCY: A defect in a structure that requires corrective action.

CATEGORIES OF DEFICIENCIES:

M= Minor Deficiency - Deficiencies which are minor in nature, generally do not impact the structural integrity of the bridge and could easily be repaired. Examples include but are not limited to: Spalled concrete, Minor pot holes, Minor corrosion of steel, Minor scouring, Clogged drainage, etc.

S= Severe/Major Deficiency - Deficiencies which are more extensive in nature and need more planning and effort to repair. Examples include but are not limited to: Moderate to major deterioration in concrete, Exposed and corroded rebars, Considerable settlement, Considerable scouring or undermining, Moderate to extensive corrosion to structural steel with measurable loss of section, etc.

C-S= Critical Structural Deficiency - A deficiency in a structural element of a bridge that poses an extreme unsafe condition due to the failure or imminent failure of the element which will affect the structural integrity of the bridge.

C-H= Critical Hazard Deficiency - A deficiency in a component or element of a bridge that poses an extreme hazard or unsafe condition to the public, but does not impair the structural integrity of the bridge. Examples include but are not limited to: Loose concrete hanging down over traffic or pedestrians, A hole in a sidewalk that may cause injuries to pedestrians, Missing section of bridge railing, etc.

URGENCY OF REPAIR:

I = Immediate- [Inspector(s) immediately contact District Bridge Inspection Engineer (DBIE) to report the Deficiency and to receive further instruction from him/her].

A = ASAP- [Action/Repair should be initiated by District Maintenance Engineer or the Responsible Party (if not a State owned bridge) upon receipt of the Inspection Report].

P = Prioritize- [Shall be prioritized by District Maintenance Engineer or the Responsible Party (if not a State owned bridge) and repairs made when funds and/or manpower is available].

CITY/TOWN	B.I.N.	BR. DEPT. NO.	8.-STRUCTURE NO.	INSPECTION DATE
PITTSFIELD	C53	P-10-055	P10055-C53-MUN-DES	FEB 28, 2024

REMARKS

BRIDGE ORIENTATION

East New Lenox Road travels north and south. Sackett Brook flows from east to west. This single span bridge is still under construction. The beams and bays are numbered from west to east, downstream to upstream, in accordance with the plans. See photos 1 & 2 and sketch 1.

GENERAL REMARKS

This structure is still under construction and many items are hidden by form work or not yet completed. The condition ratings are based on what is currently visible and carrying traffic. Temporary construction items will not be rated. Beams 1 & 2 are open to traffic. Beams 3-5 are still under construction.

ITEM 60 - SUBSTRUCTURE

Item 60.1 - Abutments
Item 60.1.h - Footings

The footings are hidden by design.

Item 60.1.i - Piles

The piles are hidden by design.

TRAFFIC SAFETY

Item 36a - Bridge Railing

The completed west portion of bridge railing consists of S3-TL4 type railing bolted to the reinforced concrete rail base. The temporary east railing consists of Jersey Barriers. Refer to item 59.9 - Railing.

Item 36b - Transitions

The permanent transitions are not built yet.

Item 36c - Approach Guardrail

The permanent approach guardrails are not built yet.

Item 36d - Approach Guardrail Ends

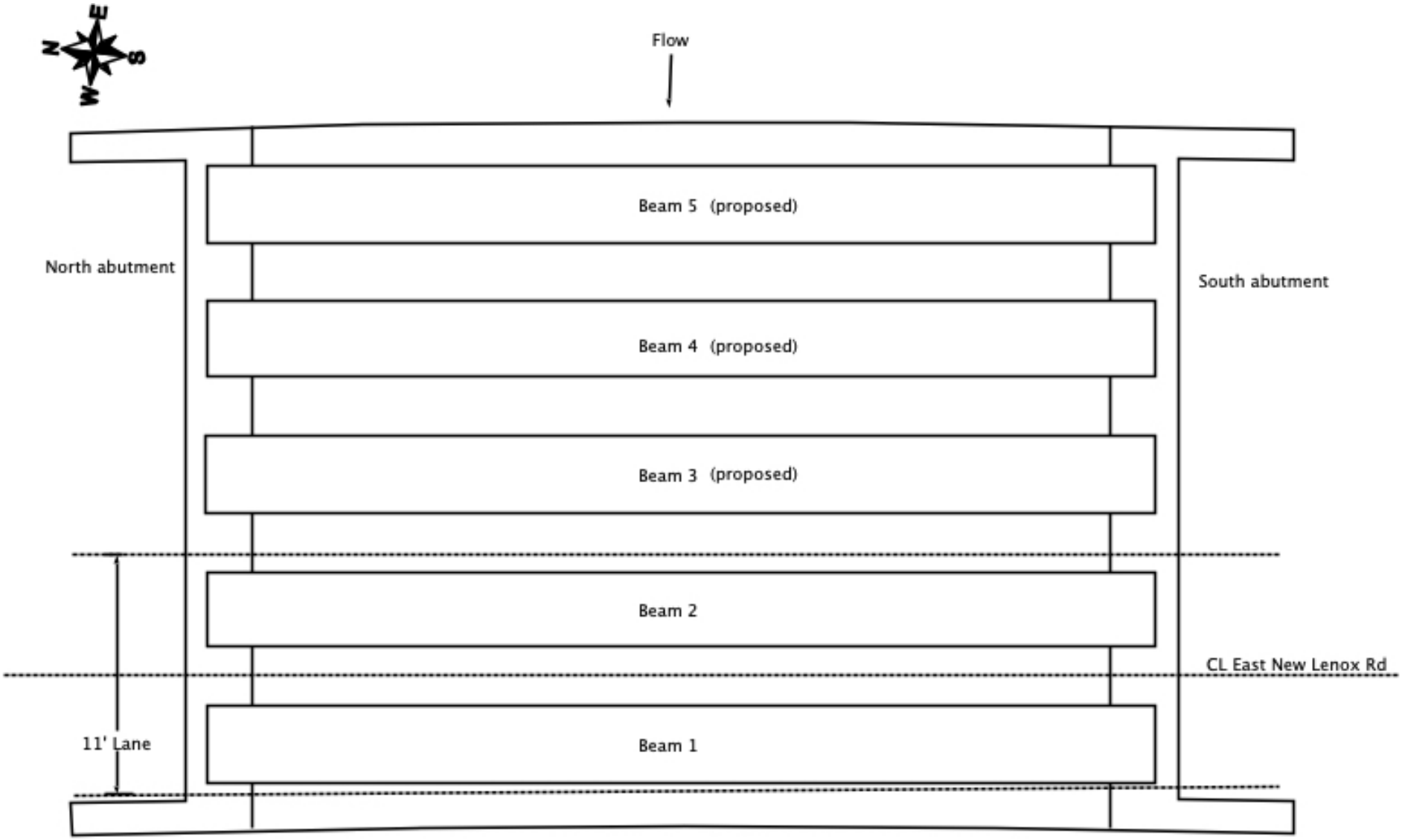
The permanent approach guardrail ends are not built yet.

Sketch / Photo Log

Sketch 1 : Framing plan.
Photo 1 : General topside, looking south.
Photo 2 : General underside, looking south.

CITY/TOWN	B.I.N.	BR. DEPT. NO.	8.-STRUCTURE NO.	INSPECTION DATE
PITTSFIELD	C53	P-10-055	P10055-C53-MUN-DES	FEB 28, 2024

SKETCHES



Sketch 1: Framing plan.

CITY/TOWN	B.I.N.	BR. DEPT. NO.	8.-STRUCTURE NO.	INSPECTION DATE
PITTSFIELD	C53	P-10-055	P10055-C53-MUN-DES	FEB 28, 2024

PHOTOS

Photo 1: General topside, looking south.

Photo 2: General underside, looking south.

National Bridge Element Inspection

BDEPT#	**P-10-055**	Date	**02/28/2024**
B.I.N.	**C53**	District Bridge Inspection Eng'r	**Laurie A. Briggs**
Item 8	**P10055-C53-MUN-DES**	Inspecting Agency	**Mass. Highway Dept.**
Span Group	**1**	Team Leader	**Reed Mancari**
Town	**Pittsfield**	Team Member(s)	**Matthew Ranzoni**
District	**1**		

El #	Element Name	Units	Env.	Total Q.	% or Q	State 1	State 2	State 3	State 4
12	**Re Concrete Deck**	sq feet	2	531.000	☐ %	531.000			
Notes :									
104	**Pre Clsd Box Girder**	feet	2	89.000	☐ %	89.000			
Notes :									
215	**Re Conc Abutment**	feet	2	14.000	☐ %	14.000			
Notes :									
310	**Elastomeric Bearing**	each	2	10	☐ %	10			
Notes :									
330	**Metal Bridge Railing**	feet	2	64.000	☐ %	64.000			
Notes :									

Report Date: February 28, 2024

State Information

BDEPT#= P10055 Agency Br.No.

Town= Pittsfield L.O.

B.I.N= C53 AASHTO= 000.0

RANK= 0 H.I.= 0 FHWA Select List= N (6/21/17)

Identification

(8) Structure Number P10055C53MUNDES

(5) Inventory Route 151000000

(2) State Highway Department District 01

(3) County Code 003 (4) Place code 53960

(6) Features Intersected **WATER SACKETT BROOK**

(7) Facility Carried **HWY E NEW LENOX**

(9) Location .7 MI S OF WILLIAM ST

(11) Kilometerpoint 0000.000

(12) Base Highway Network N

(13) LRS Inventory Route & Subroute

(16) Latitude 42 DEG 25 MIN 28.25 SEC

(17) Longitude 73 DEG 13 MIN 30.97 SEC

(98) Border Bridge State Code Share %

(99) Border Bridge Structure No. #

Structure Type and Material

(43) Structure Type Main: Prestressed Concrete Code 506

Box Beam - Spread Jointless bridge type: Not applicable

(44) Structure Type Appr: INTEGRAL (weak axis)

Code

(45) Number of spans in main unit 1 ~~000~~

(46) Number of approach spans 0000

(107) Deck Structure Type - Concrete Cast-in-Place Code 1

(108) Wearing Surface / Protective System:

A) Type of wearing surface - Code 6

B) Type of membrane - Code 3

C) Type of deck protection - Code 1

Age and Service

(27) Year Built 2023 ~~0000~~

(106) Year Reconstructed 0000

(42) Type of Service: On - Highway

Under - Waterway Code 15

(28) Lanes: On Structure 00 Under structure 00

(29) Average Daily Traffic 003621

(30) Year of ADT 2017 (109) Truck ADT 06 %

(19) Bypass, detour length 012 KM

Geometric Data

(48) Length of maximum span 13.5 ~~0000.0~~ M

(49) Structure Length 14.6 ~~00000.0~~ M

(50) Curb or sidewalk: Left 00.0 M Right .3 ~~00.0~~ M

(51) Bridge Roadway Width Curb to Curb 3.3 ~~000.0~~ M

(52) Deck Width Out to Out 4.2 ~~000.0~~ M

(32) Approach Roadway Width (w/shoulders) 3.3 ~~000.0~~ M

(33) Bridge Median - Code

(34) Skew 00 DEG (35) Structure Flared N

(10) Inventory Route MIN Vert Clear 99.9 ~~00.00~~ M

(47) Inventory Route Total Horiz Clear 3.3 ~~00.0~~ M

(53) Min Vert Clear Over Bridge Rdwy 99.9 ~~00.00~~ M

(54) Min Vert Underclear ref 00.00 M

(55) Min Lat Underclear RT ref 00.0 M

(56) Min Lat Underclear LT 00.0 M

Navigation Data

(38) Navigation Control - No navigation control on waterway Code 0

(111) Pier Protection Code

(39) Navigation Vertical Clearance 000.0 M

(116) Vert-lift Bridge Nav Min Vert Clear M

(40) Navigation Horizontal Clearance 0000.0 M

Classification

	Code
(112) NBIS Bridge Length	N
(104) Highway System	N
(26) Functional Class - Urban Local	19
(100) Defense Highway	0
(101) Parallel Structure	N
(102) Direction of Traffic - ~~2-way traffic~~ 1 lane for 2 way	2
(103) Temporary Structure	N
(105) Federal Lands Highways	0
(110) Designated National Network	N
(20) Toll - On free road	3
(21) Maintain - City/Municipal Highway A	04
(22) Owner - City/Municipal Highway A	04
(37) Historical Significance	

Condition

	Code
(58) Deck	9
(59) Superstructure	9
(60) Substructure	9
(61) Channel & Channel Protection	9
(62) Culverts	N

Load Rating and Posting

	Code
(31) Design Load - HL-93	A
(63) Operating Rating Method -	
(64) Operating Rating	0
(65) Inventory Rating Method -	
(66) Inventory Rating	0
(70) Bridge Posting	0
(41) Structure - Open with shoring	D

Appraisal

	Code
(67) Structural Evaluation	~~0~~ 3
(68) Deck Geometry	~~N~~ 2
(69) Underclearances, vert. and horiz.	N
(71) Waterway adequacy	7
(72) Approach Roadway Alignment	7
(36) Traffic Safety Features	0 0 0 0
(113) Scour Critical Bridges 2/28/24	

Inspections

(90) Inspection Date 00/~~00/00~~ (91) Frequency 24 ~~00~~ MO

(92) Critical Feature Inspection: (93) CFI DATE

(A) Fracture Critical Detail	N	00	MO A)	00/00/00
(B) Underwater Inspection	N	00	MO B)	00/00/00
(C) Other Special Inspection	N	00	MO C)	00/00/00
(*) Other Inspection (Lane width)	N	00	MO *)	11/~~06/23~~ 00/00/00
(*) Closed Bridge	N	00	MO *)	00/00/00
(*) UW Special Inspection	N	00	MO *)	00/00/00
(*) Damage Inspection			MO *)	00/00/00

Rating Loads

Report Date 00/00/00	H20	Type 3	Type 3S2	Type HS
Operating	0.0	0.0	0.0	0.0
Inventory	0.0	0.0	0.0	0.0

Field Posting

Status Posting Date 00/00/00

	2 Axle	3 Axle	5 Axle	Single
Actual				
Recommended				

Missing Signs N

Misc.

Bridge Name

N Anti-missile fence N Acrow Panel N Jointless Bridge

Freeze/Thaw

Stairs On/Adjacent 0 Stair Owner(s)

Accessibility (Needed/Used)

N	Liftbucket	N	Rigging	Other
N	Ladder	N	Staging	
N	Boat	N	Traffic Control	
P	Wader	N	RR Flagperson	Inspection Hours: ~~000~~ 6
N	Inspector 50	N	Police	

Report Date: October 1, 2024

State Information

BDEPT#= P10055 Agency Br.No.

Town= Pittsfield L.O.

B.I.N= C53 AASHTO= 007.0

RANK= 0 H.I.= 100.0 % FHWA Select List= N (6/21/17)

Identification

(8) Structure Number P10055C53MUNDES

(5) Inventory Route 151000000

(2) State Highway Department District 01

(3) County Code 003 (4) Place code 53960

(6) Features Intersected **WATER SACKETT BROOK**

(7) Facility Carried **HWY E NEW LENOX**

(9) Location .7 MI S OF WILLIAM ST

(11) Kilometerpoint 0000.000

(12) Base Highway Network N

(13) LRS Inventory Route & Subroute

(16) Latitude 42 DEG 25 MIN 28.25 SEC

(17) Longitude 73 DEG 13 MIN 30.97 SEC

(98) Border Bridge State Code Share %

(99) Border Bridge Structure No. #

Structure Type and Material

(43) Structure Type Main: Prestressed Concrete Code 506

Box Beam or Girders - Single or Spread Jointless bridge type: INTEGRAL (weak a

(44) Structure Type Appr:

Code

(45) Number of spans in main unit 001

(46) Number of approach spans 0000

(107) Deck Structure Type - Concrete Cast-in-Place Code 1

(108) Wearing Surface / Protective System:

A) Type of wearing surface - Bituminous Code 6

B) Type of membrane - Epoxy Code 3

C) Type of deck protection - Epoxy Coated Reinforcing Code 1

Age and Service

(27) Year Built 2023

(106) Year Reconstructed 0000

(42) Type of Service: On - Highway

Under - Waterway Code 15

(28) Lanes: On Structure 01 Under structure 00

(29) Average Daily Traffic 003621

(30) Year of ADT 2017 (109) Truck ADT 06 %

(19) Bypass, detour length 012 KM

Geometric Data

(48) Length of maximum span 0013.5 M

(49) Structure Length 00014.6 M

(50) Curb or sidewalk: Left 00.0 M Right 00.3 M

(51) Bridge Roadway Width Curb to Curb 003.3 M

(52) Deck Width Out to Out 004.2 M

(32) Approach Roadway Width (w/shoulders) 003.3 M

(33) Bridge Median - No median Code 0

(34) Skew 00 DEG (35) Structure Flared N

(10) Inventory Route MIN Vert Clear 99.99 M

(47) Inventory Route Total Horiz Clear 03.3 M

(53) Min Vert Clear Over Bridge Rdwy 99.99 M

(54) Min Vert Underclear ref N 00.00 M

(55) Min Lat Underclear RT ref N 00.0 M

(56) Min Lat Underclear LT 00.0 M

Navigation Data

(38) Navigation Control - No navigation control on waterway Code 0

(111) Pier Protection Code

(39) Navigation Vertical Clearance 000.0 M

(116) Vert-lift Bridge Nav Min Vert Clear M

(40) Navigation Horizontal Clearance 0000.0 M

Classification

	Code
(112) NBIS Bridge Length	Y
(104) Highway System	N
(26) Functional Class - Urban Local	19
(100) Defense Highway	0
(101) Parallel Structure	N
(102) Direction of Traffic - One lane for 2-way traffic	3
(103) Temporary Structure	N
(105) Federal Lands Highways	0
(110) Designated National Network	N
(20) Toll - On free road	3
(21) Maintain - City/Municipal Highway A	04
(22) Owner - City/Municipal Highway A	04
(37) Historical Significance	

Condition

	Code
(58) Deck	9
(59) Superstructure	9
(60) Substructure	9
(61) Channel & Channel Protection	9
(62) Culverts	N

Load Rating and Posting

	Code
(31) Design Load - HL 93	A
(63) Operating Rating Method -	
(64) Operating Rating	0
(65) Inventory Rating Method -	
(66) Inventory Rating	0
(70) Bridge Posting	0
(41) Structure - Open with shoring	D

Appraisal

	Code
(67) Structural Evaluation	3
(68) Deck Geometry	2
(69) Underclearances, vert. and horiz.	N
(71) Waterway adequacy	7
(72) Approach Roadway Alignment	7
(36) Traffic Safety Features	0 0 0 0
(113) Scour Critical Bridges	

Inspections

(90) Inspection Date 02/28/24 (91) Frequency 24 MO

(92) Critical Feature Inspection: (93) CFI DATE

(A) Fracture Critical Detail	N	00	MO A)	00/00/00
(B) Underwater Inspection	N	00	MO B)	00/00/00
(C) Other Special Inspection	N	00	MO C)	00/00/00
(*) Other Inspection ()	N	00	MO *)	00/00/00
(*) Closed Bridge	N	00	MO *)	00/00/00
(*) UW Special Inspection	N	00	MO *)	00/00/00
(*) Damage Inspection			MO *)	00/00/00

Rating Loads

Report Date 00/00/00	H20	Type 3	Type 3S2	Type HS
Operating	0.0	0.0	0.0	0.0
Inventory	0.0	0.0	0.0	0.0

Field Posting

Status Posting Date 00/00/00

	2 Axle	3 Axle	5 Axle	Single
Actual				
Recommended				

Missing Signs N

Misc.

Bridge Name

N Anti-missile fence N Acrow Panel Y Jointless Bridge Freeze/Thaw

Stairs On/Adjacent 0 Stair Owner(s)

Accessibility (Needed/Used)

N / N	Liftbucket	N / N	Rigging	Other
N / N	Ladder	N / N	Staging	
N / N	Boat	N / N	Traffic Control	
P / N	Wader	N / N	RR Flagperson	Inspection Hours: 008
N / N	Inspector 50	N / N	Police	

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

R. Christopher Brittain,
Town Administrator

July 29, 2025

Mr. Josh Fontaine
EPA New England
10 Lyman Street, Suite 2
Pittsfield, MA 01201

Dear Mr. Fontaine:

Please find comments from the Town of Lee regarding the Road Assessment Work Plan:

Table 1 of the work plan lists several roads in the Town of Lee. The Town requests further details on the following:

The previously presented transportation plan indicated that reach 7 materials would be moved by hydraulic dredging. Please provide the proposed use of Columbia, Center and Bradley Streets for 7 B and C if materials are moved hydraulically. Also please indicate how Columbia, Center and Bradly Street will be used for UDF Construction with out the use of other roads in town in order to connect to a major highway. For example, if equipment or materials for the UDF need to connect to Interstate 90 through Center or Columbia Street they would also need to pass through Main Street and Housatonic Street in Lee.

Table 1 also indicated Orchard and Greylock as "included for background information – not anticipated to be used". Please clarify why these roads are being evaluated if they are not being used. The Town of Lee is particularly concerned about potential use of these roads, especially for reach 7 materials, as they are a populated residential area and include 3 schools (Lee High School, Lee Elementary School and St. Mary's School).

Sincerely,

R. Christopher Brittain
Town Administrator

TOWN OF LENOX
6 Walker Street, Lenox, MA 01240
www.townoflenox.com

Jay R. Green, J.D.
Town Manager

Mr. Josh Fontaine
Remedial Project Manager
Rest of River
5 Post Office Sq. Suite 100
Boston, MA 02109-3912

Re: Town of Lenox Comments on Road Assessment Work Plan

Dear Mr. Fontaine and EPA staff:

The Town of Lenox submits this letter to communicate its concerns and comments regarding the proposed Road Assessment Work Plan (hereinafter, work plan) by General Electric (GE) for roads identified and associated with the construction of the Upland Disposal Facility (UDF) and Rest of River (ROR) cleanup operations. Lenox will be impacted by GE trucking activity and other associated vehicular traffic during the construction of the UDF and ROR remediation work. This type of activity will affect the quality of life for our residents and businesses that live on, near and use these public ways.

The work plan indicates that some roads are not in sufficient condition to stand up to the loads that GE needs to put on them. It is assumed that GE will be responsible for the construction of new roads, the improvement of existing roads and maintaining affected roads in a state of good repair during ROR operations and at the conclusion of the ROR project. However, these responsibilities appear vague. Lenox requests that these expectations and responsibilities be clearly spelled out in order to assess accountability and responsibility.

Frequency & Type of Vehicles Anticipated to be Used

Notwithstanding the assessment methodology and scope as discussed below, Lenox requests that GE provide EPA and Lenox estimates on the number of truck trips it anticipates daily during UDF construction and identify the type of vehicles reasonably anticipated to be used for hauling UDF construction materials. Estimated weight and frequencies will help Lenox assess road construction methodologies as proposed by GE and anticipate potential road and infrastructure damage in addition to any assessment work performed by GE. Similarly, Lenox requests the same data for those vehicles proposed to be used for moving materials to the UDF from the Woods Pond rail transfer yard during the clean-up phase of work. Should rail transportation not be feasible at any given time during cleanup operations as discussed in EPA's Conditional Approval of the Transportation and Disposal Plan, these trucks will be using roadways identified as alternative routes in the Transportation and Disposal Plan to move material from work sites to the UDF.

Hours of Operation & Public Communication

Lenox also has concerns as to when truck traffic will be present on routes associated with UDF construction and cleanup operations as this will directly impact quality of life. Lenox is requesting that EPA set reasonable hours of operation and require GE to provide information on how it plans to mobilize equipment and

TOWN OF LENOX
6 Walker Street, Lenox, MA 01240
www.townoflenox.com

Jay R. Green, J.D.
Town Manager

materials for construction of the UDF. This information will assist the Town of Lenox in setting expectations, communicating to its residents and monitoring and responding to quality-of-life issues around truck traffic. Similarly, Lenox is requesting that GE provide weekly public notices via media channels and directly to municipalities on reasonably anticipated trucking activities or transportation changes during UDF construction and cleanup operations.

Comments & Concerns in Section 1 Introduction and Background

The Work Plan includes assessment of planned primary and alternative routes for trucking during the ROR project. Lenox is seeking clarity in the work plan that the same schedule of assessments be performed on alternative routes should those routes be used and notice provided to Lenox if those routes become active. The work plan should also include what controls, accountability and assessment will be put in place should non-authorized routes be used. Lenox requests that EPA and/or GE establish a method to directly receive resident/community concerns regarding ROR transportation activities.

The Town of Lenox requests that GE make a commitment to meet with municipalities regularly regarding changes to trucking routes as they are identified prior to publishing them in future design documents. Our community is very concerned about the impact to the community infrastructure and quality of life from trucking during the performance of the project. Lenox wants to be sure GE and EPA effectively communicate to its residents the where, when, why and how trucks and other traffic will be moving through their neighborhoods.

Comments & Concerns in Section 2.1 Paved Roads

The assessment methods for paved roads as proposed are considered to be insufficient to assess the totality of impact of ROR activities on the roadways, especially within the subgrade. Consistent with its previous request and contained in the Settlement Agreement, Lenox is requesting that ground penetrating radar (GPR) be used during all phases of assessment to determine if subgrade materials and/or infrastructure has been affected. Surface treatment via overlay will not address and may mask underlying failures that will eventually degrade the road.

In addition to GPR, Lenox is requesting that mobile LiDAR be used during all phases of assessment in addition to the proposed methods to document the existing and post activity surface for evaluation of rutting and shoving, which are typical roadway failure modes from heavy truck traffic, that may result from the ROR project-related transportation.

Should GE install new pavement down on a road, the proposed assessment methods will not be sufficient to evaluate damage to the road and/or subbase. Lenox is requesting the use of LiDAR to give elevation information that can better assess potential future failure.

Comments & Concerns in Section 2.3 Infrastructure

This section is unclear in what specific infrastructure will be assessed. Lenox is requesting that infrastructure such as drainage structures, culverts and manholes be clearly identified as requiring assessment. All assessments should include video inspection with internal measurements due to the potential of structural

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failure of these structures being exposed to the significantly high volume of heavy truck traffic. GE should research and consult with the municipalities to obtain any existing data as to the number, location, size, and material of any of these structures. A survey should be completed for the identified and agreed upon infrastructure to determine if settlement is occurring using accepted engineering practices, such as LiDAR, GPR, etc.

Assessment of infrastructure should also include other roadway infrastructure that may be present and affected such as guide railing, signs, drainage ditches, traffic control devices, curbing, sidewalks, sidewalk ramps, etc.

Underground utilities that serve businesses and residents may be affected by overhead truck traffic. Lenox is requesting that GE identify and inventory utility services such as lateral sewer connections and water service connections and identify an assessment methodology to identify any impact and that GE be responsible for the repair and restoration of such underground utility services.

Comments & Concerns in Section 3 Schedule, Data Evaluation, and Reporting

The proposed work plan states that "If a notable trend divergence occurs on a road or road segment subject to ROR project transportation activities, GE will conduct additional analysis to assess whether the increased rate of road degradation can be attributed to the ROR project or some other factor." The term "notable" is vague and should be further defined with clear metrics. Furthermore, "additional analysis" should also be defined. The responsibility for determining what is a "notable trend" or if the additional analysis is sufficient should be made clear. Acceptability criteria and the opportunity for municipalities to evaluate should be established.

The proposed work plan provides that by February 15 of each year of the ROR project, "GE will submit to EPA, with copies to the pertinent municipalities, an annual report summarizing the road assessment and associated evaluations performed during the prior year. In accordance with Paragraph VI.A.3 of the February 2020 Settlement Agreement, such report will include photographic documentation of the condition of assessed infrastructure and roads for review by the affected municipality as appropriate." The Town of Lenox is requesting that all data assessments, data collected, analysis and/or computations made, conclusions, results, and reports be provided to the municipality with adequate time for comment prior to acceptance. And lastly, throughout the proposed work plan, there are references that "further details will be included in future reports and communications with effected municipalities in future meetings." This language is vague and more detail and expectations should be set.

Thank you for the opportunity to comment and for your attention to these concerns.

Respectfully submitted,

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Town Manager