Kevin Mooney
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Via Electronic Mail

October 30, 2025

Mr. Jeffrey Dewey
Project Manger
U.S. Environmental Protection Agency, New England Region
5 Post Office Square – Suite 100
Boston, MA 02109-3912

Re: GE-Pittsfield/Housatonic River Site
Silver Lake Area (GECD600)
2025 Cap Maintenance Summary Report

Dear Mr. Dewey:

Pursuant to the requirements set forth in the October 2000 Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site (the Site) and the accompanying Statement of Work for Removal Actions Outside the River (SOW), the General Electric Company (GE) implemented a Removal Action at the Silver Lake Area between July 2012 and December 2013, including installation of a sediment cap. Following completion of that Removal Action, GE developed a Post-Removal Site Control (PRSC) Plan and included the plan in the Final Completion Report (FCR) for the Silver Lake Area Removal Action, which was submitted to the United States Environmental Protection Agency (EPA) on May 20, 2015 and approved by EPA on June 22, 2015.

The applicable Performance Standards for the Silver Lake post-remediation cap monitoring and evaluation were set forth in Section 2.6 and Attachment K of the Statement of Work for Removal Actions Outside the River (Appendix E to the CD) and summarized in the PRSC Plan in the FCR. In accordance with that program. GE conducted the fifth post-construction cap monitoring event in 2018, which constituted the final year of the cap monitoring program required by the PRSC Plan in the FCR; and GE concluded in its December 14, 2018 letter report that the results of the monitoring events performed to date indicated that the requirements for the Silver Lake sediment cap were substantially met with no need for corrective action. At that time, GE also proposed to perform another monitoring event in 2023 (i.e., 10 years after construction) to continue to assess the cap thickness, cap isolation layer, and polychlorinated biphenyl (PCB) deposition on the cap surface; that proposal was conditionally approved by EPA on February 14, 2019.

GE performed the scheduled 10-year post-remediation monitoring of the Silver Lake cap in September 2023 to assess cap thickness through the collection of cap material cores, and it submitted a report on those activities to EPA on February 9, 2024. In that report, GE proposed to perform additional cap thickness testing around SL-CAP-11, as that location did not meet the cap thickness performance standard of a total of 14 inches of cap material.[1] EPA approved that proposal on February 29, 2024, and GE performed the additional cap thickness testing at 12 locations around SL-CAP-11 on April 29 through May 1, 2024. Based on the thickness measurements observed during the April/May 2024 event, GE proposed to EPA on May 15, 2024 to perform a second round of cap thickness testing east of SL-CAP-11. EPA agreed with that proposal on May 29, 2024, and GE performed the additional cap thickness testing at 12 additional locations east of SL-CAP-11 on June 3 through June 6, 2024. On November 5, 2024, GE submitted a letter report to EPA presenting the results of cap thickness testing performed around SL-CAP-11, proposing definition of an area over which GE would place additional cap material, and

[1] As specified in the *Revised Final Removal Design/Removal Action Work Plan for Silver Lake Area* (August 2011) (p. 59), the EPA-approved design of the Silver Lake cap called for a total thickness of 14 inches, which included a six-inch layer for bioturbation, a six-inch isolation layer, and a two-inch mixing layer.

outlining the general means, methods, and schedule for such placement of additional cap material. EPA approved that report on November 13, 2024. Figure 1 illustrates the 2023 and 2024 sediment cap monitoring locations and the proposed cap maintenance area.

In accordance with the proposal described in GE's November 5, 2024 letter, GE submitted a work plan developed by the selected contractor to EPA on July 18, 2025, describing the means and methods for placement of additional cap material in Silver Lake over an area delineated around SL-CAP-11. In addition, the July 2025 submittal identified the selected source of cap material and provided pertinent data on the gradation and total organic carbon (TOC) content and other chemical characteristics of the selected cap material (including PCBs, inorganics, semi-volatile organic compounds, and volatile organic compounds). EPA conditionally approved the work plan submittal on August 7, 2025.

1. Additional Data for Selected Cap Material

After submittal of the July 2025 work plan, GE collected additional samples of the selected cap material for analysis of TOC and gradation. The pertinent data were provided to EPA via email on August 8, 2025 for review and approval, and were approved via email on August 13, 2025. A copy of these testing results as submitted to and approved by EPA is provided in Attachment 1. Based on review of the overall sampling results, which achieved the sample frequency for each analyte required for cap material by the August 2011 *Revised Final Remedial Design/Remedial Action Work Plan for the Silver Lake Area*, the total approved volume for cap maintenance activities was up to 1,500 cubic yards (cy) of material.

2. Summary of Completed Cap Maintenance Activities

Mobilization and site preparation activities for the cap maintenance activities commenced on August 11, 2025, with access to the maintenance area obtained through Parcel I9-9-30. Because the contractor planned to utilize a water-based approach to cap placement, there was very limited disturbance to the bank and shoreline armor system to facilitate access to the cap maintenance area. Large woody debris installed along the shoreline of the cap maintenance area at the completion of the Removal Action at the Silver Lake Area was temporarily relocated to facilitate access and placement activities.

Prior to initiation of cap material placement, a turbidity curtain was installed across the outlet from Silver Lake. The turbidity curtain was inspected throughout construction to ensure that it was functioning as intended. In addition, water quality monitoring during material placement was performed based on visual observation of turbidity inside the work area and in the outlet from the lake outside of the turbidity controls. No turbidity generated by placement activities was observed to leave the work area, nor was turbidity generated by placement activities observed at the outfall to the Housatonic River. Additionally, at no time during the work time did visual observations indicate the need for measurements of turbidity.

Between August 14 and 22, 2025, GE placed an additional six to nine inches of cap material, respectively, in the six-inch and nine-inch cap placement areas illustrated on Figure 2, covering an area of approximately 34,000 square feet. A total of nearly 1,500 cy of material was placed. Work was performed in accordance with the approved work plan by mechanically placing thin lifts of cap materials through the water column from a floating platform. Each lift was placed across the entire area proposed for maintenance before starting the next lift. Throughout cap placement activities, the area to be capped was monitored routinely to provide interim information to the contractor on cap thickness. Such monitoring consisted of use of standard geolocation technology (e.g., RTK-GPS) on the mechanical placement equipment and routine surveys.

After completion of cap installation in each area (i.e., the six-inch and nine-inch placement areas), post-installation thickness monitoring was performed by GE to confirm that thickness/extent requirements were achieved. At each location, similar to efforts made during prior routine monitoring events, a representative core was collected by physically pushing a Lexan tube to the apparent bottom of the cap and just into the native sediment and then bringing the core to the surface. The cores were processed on land and the thickness of the cap material in each

core-collection tube was measured as the distance from the interface between the cap and underlying sediment to the approximate top of the cap material, excluding observed deposition. The coring procedure provided that, if a discernible mixing layer (i.e., a layer with the visual characteristics of a transition zone between the cap and underlying sediment) with measurable thickness was observed at the bottom of the core, the thickness measurement would extend to the bottom of the mixing layer, given that the EPA-approved design for the 14-inch cap included a two-inch mixing layer. However, no separate layer with visual characteristics of a mixing layer was observed during the post-placement monitoring. The monitoring activities were led by Arcadis (on GE's behalf), and HDR, Inc. provided oversight on behalf of EPA. The thickness results are included in Table 1 and illustrated on Figure 2. Attachment 2 provides photographs of the construction activities.

For the first round of post-installation thickness monitoring, conducted on August 20, 2025, after approximately six inches of cap material had been placed across the entire cap maintenance area, GE collected the post-placement thickness monitoring cores at the four locations defined in the November 2024 letter within the six-inch cap placement area (i.e., locations SL-CAP-11-Maint-1 through -4 illustrated on Figure 2). The August 20 post-placement cores indicated that placement achieved the performance standard thickness at three of those four locations; however, cap thickness at the western-most location (SL-CAP-11-Maint-1) was measured to be 13.25 inches, which is less than the 14-inch performance standard. As a result, GE placed an additional lift of material on the western portion of the cap maintenance area, and re-collected a post-placement thickness monitoring core at SL-CAP-11-Maint-1 on August 21, 2025. The August 21 post-placement core confirmed that thickness/extent requirements were achieved for the six-inch cap placement area.

GE continued to place material across the nine-inch cap placement area, and then placed an extra lift of material in the area around one of the previously sampled locations in that area (SL-CAP-11-5th-NE), as required by the November 2024 letter. After all of the required cap maintenance activities were completed, on August 21, 2025, GE collected the post-placement thickness monitoring cores at the two locations designated in the November 2024 letter within the nine-inch cap placement area (i.e., locations SL-CAP-11-Maint-5 and -6 illustrated on Figure 2). The core measurements indicated that placement achieved the performance standard thickness of 14 inches at all locations. However, as a conservative measure, GE placed additional cap material, up to the 1,500 cy total volume approved by EPA, across all of the nine-inch cap placement area and a portion of the six-inch cap placement area. Following installation of the additional cap material, GE re-collected post-placement thickness monitoring cores at SL-CAP-11-Maint-5 and -6 on August 22, 2025, which confirmed the total thickness of the installed cap. The final thickness results are included in Table 1 and illustrated on Figure 2.

Following completion of cap placement, the affected area of the shoreline was restored by replacing stone and large woody debris and general housekeeping of the work area used during cap placement activities. Before removal of the turbidity curtain, the turbidity outside of the turbidity curtain was visually assessed to confirm that the turbidity inside the curtain was similar to the turbidity outside of the curtain. Demobilization and general site restoration (e.g., grading and seeding) were completed by August 27, 2025. Supplemental restoration activities (e.g., relocation of the alignment of the fence along the north side of the property, supplemental plantings), performed at the request of the property owner, were completed on September 29, 2025.

3. Future Monitoring

A summary of the maintenance activities summarized above will also be presented in the next fall consolidated multi-area inspection report, due to be submitted to EPA in January 2026. As described in the November 5, 2024 letter, GE will monitor the maintenance area one year and five years after these maintenance activities were completed (i.e., in 2026 and 2030). GE anticipates that each of those monitoring events will include collection of cores at locations near the locations assessed immediately after construction (as shown on Figure 2). However, GE will submit to EPA for review and approval, at least 60 days before each of these post-maintenance monitoring events, a specific proposal for the given post-maintenance cap monitoring event. In addition, as GE proposed in its November 2024 letter and EPA approved, GE will perform another monitoring event 20 years after cap construction completion (i.e., in 2033) to continue to assess the cap thickness as well as the cap isolation layer. In the spring of 2033, GE will submit to EPA a specific proposal for that 20-year post-construction cap monitoring

event. In addition, following that monitoring event, a report will be submitted to EPA, which will present the results and include a proposal regarding whether to terminate the cap monitoring program or to perform another supplemental monitoring event (e.g., 30 years after construction).

Please contact me if you have any questions regarding the information and conclusions presented in this letter.

Sincerely yours,

Lauren Putnam for

Kevin Mooney
Senior Project Manager

Attachments

cc (via electronic mail):
Joshua Fontaine, EPA
John Kilborn, EPA
Richard Fisher, EPA
Alexander Carli-Dorsey, EPA
Christopher Ferry, ASRC Federal
Thomas Czelusniak, HDR Inc.
Scott Campbell, Taconic Ridge Environmental
Izabella Zapisek, Taconic Ridge Environmental
Michael Gorski, MassDEP
Tamara Cardona-Marek, MassDEP
Ben Guidi, MassDEP
Jason Perry, MassDEP
Michelle Craddock, MassDEP
Betsy Harper, MA AG
Traci Iott, CT DEEP
Graham Stevens, CT DEEP
Carol Papp, CT DEEP
Lori DiBella, CT AG
Danielle Perry, NOAA
James McGrath, City of Pittsfield
Andy Cambi, City of Pittsfield
Michael Coakley, PEDA
Lance Hauer, GE
Eric Merrifield, GE
Matthew Calacone, GE
Andrew Inglis, GE
Rachel Leary, GE
Mark Gravelding & Lauren Putnam, Arcadis
James Bieke, Counsel for GE
GE Internal Repository

Table

Table 1
Thickness Data for Post-Placement Monitoring - Cap Maintenance Area Around SL-CAP-11

Silver Lake Area
General Electric Company - Pittsfield, Massachusetts

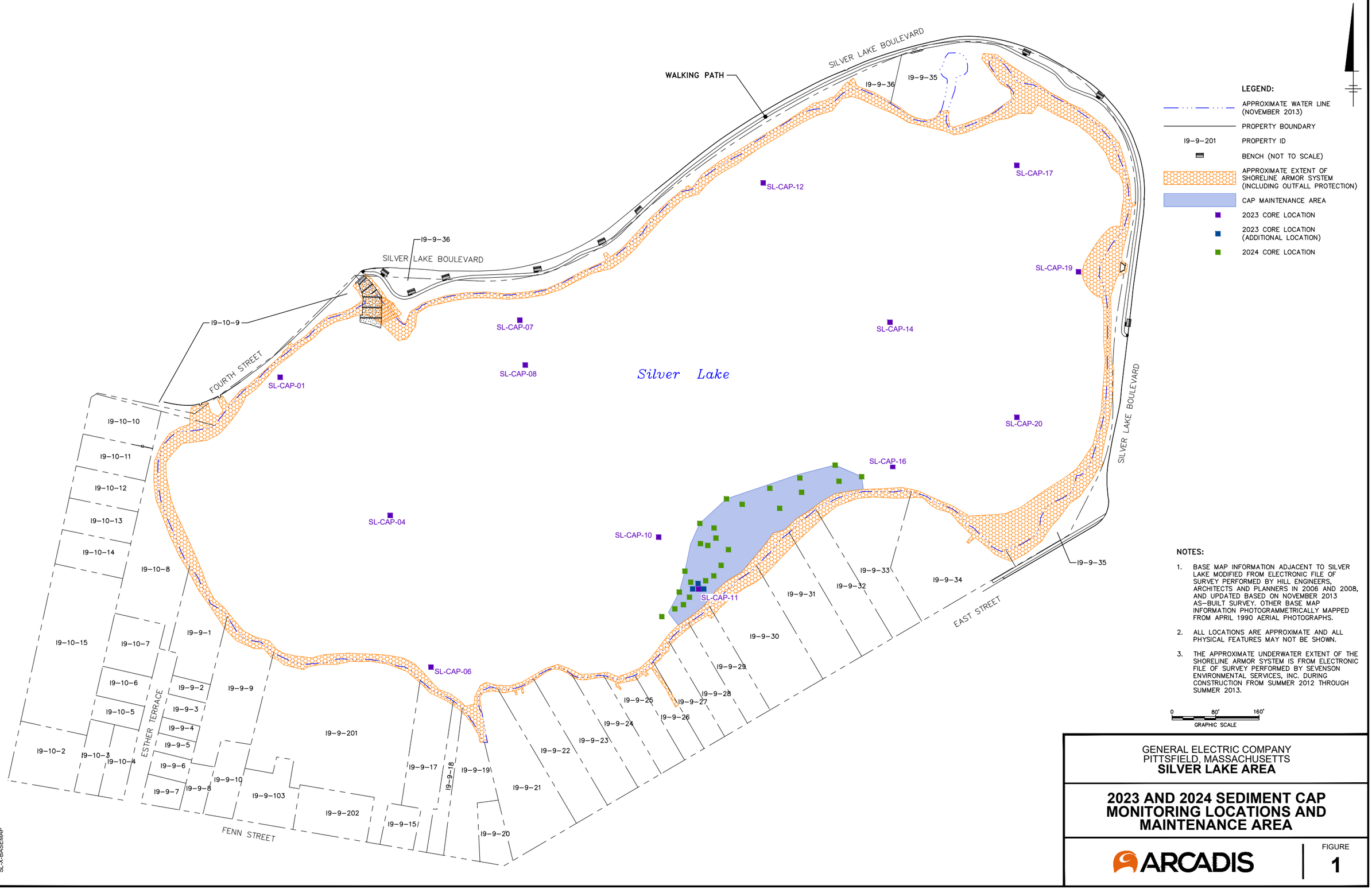
ID:	SL-CAP-11-Maint-1	SL-CAP-11-Maint-2	SL-CAP-11-Maint-3	SL-CAP-11-Maint-4
Intervals **Date:**	**8/20/2025**	**8/20/2025**	**8/20/2025**	**8/20/2025**
Water Depth (feet)	8.0	11.2	13.2	13.6
Measured Penetration (inches)	30	30	30	30
Measured Recovery (inches)	25	26	21	19
Observed Deposition (inches)	None	None	None	None
Cap Material (inches)	**13.25**	**15.50**	**14.50**	**15.25**
Mixing Layer (inches)	**None**	**None**	**None**	**None**
Native Material (inches)	9.75	10.00	6.75	4.00
Marl (inches)	2.00	None	None	None
Approximate Cap Thickness (inches)	**13.25**	**15.50**	**14.50**	**15.25**

ID:	SL-CAP-11-Maint-1	SL-CAP-11-Maint-5	SL-CAP-11-Maint-6
Intervals **Date:**	**8/21/2025**	**8/21/2025**	**8/21/2025**
Water Depth (feet)	7.8	5.8	8.6
Measured Penetration (inches)	30	30	30
Measured Recovery (inches)	27	25	24
Observed Deposition (inches)	None	None	None
Cap Material (inches)	**16.50**	**14.50**	**14.25**
Mixing Layer (inches)	**None**	**None**	**None**
Native Material (inches)	10.50	5.75	10.25
Marl (inches)	None	5.00	None
Approximate Cap Thickness (inches)	**16.50**	**14.50**	**14.25**

ID:	SL-CAP-11-Maint-5	SL-CAP-11-Maint-6
Intervals **Date:**	**8/22/2025**	**8/22/2025**
Water Depth (feet)	4.8	6.6
Measured Penetration (inches)	30	30
Measured Recovery (inches)	30	27
Observed Deposition (inches)	None	None
Cap Material (inches)	**17.00**	**16.50**
Mixing Layer (inches)	**None**	**None**
Native Material (inches)	6.00	10.75
Marl (inches)	7.00	None
Approximate Cap Thickness (inches)	**17.00**	**16.50**

Notes:
1. Cores were collected by Arcadis and oversight was provided by HDR, Inc. on behalf of EPA.
2. The Approximate Cap Thickness would have included a mixing layer, but no separate layer with the visual characteristics of a mixing layer was observed. No deposition was observed, as the cores were collected immediately after placement of new material, but if deposition had been observed it would not be included in the Approximate Cap Thickness.

Figures



NOTES:

1. BASE MAP INFORMATION ADJACENT TO SILVER LAKE MODIFIED FROM ELECTRONIC FILE OF SURVEY PERFORMED BY HILL ENGINEERS, ARCHITECTS AND PLANNERS IN 2006 AND 2008, AND UPDATED BASED ON NOVEMBER 2013 AS-BUILT SURVEY. OTHER BASE MAP INFORMATION PHOTOGRAMMETRICALLY MAPPED FROM APRIL 1990 AERIAL PHOTOGRAPHS.
2. ALL LOCATIONS ARE APPROXIMATE AND ALL PHYSICAL FEATURES MAY NOT BE SHOWN.
3. THE APPROXIMATE UNDERWATER EXTENT OF THE SHORELINE ARMOR SYSTEM IS FROM ELECTRONIC FILE OF SURVEY PERFORMED BY SEVENSON ENVIRONMENTAL SERVICES, INC. DURING CONSTRUCTION FROM SUMMER 2012 THROUGH SUMMER 2013.

0 80' 160'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
SILVER LAKE AREA

2023 AND 2024 SEDIMENT CAP MONITORING LOCATIONS AND MAINTENANCE AREA

ARCADIS

FIGURE
1

C:\Users\LPOSENAUER\DCACCDocs\Arcadis ACC US\AUS-99999999-GE_PITTSFIELD_MA\Project Files\10_WIP\10T_ARC_ENV\2025\01-DWG\SL2024-F01-AS COLLECTED SED CAP INSPECTION.dwg LAYOUT: 1 SAVED: 10/15/2025 2:05 PM ACADVER: 25.1S (LMS TECH) PAGESETUP: ----
PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 10/17/2025 3:37 PM BY: POSENAUER, LISA
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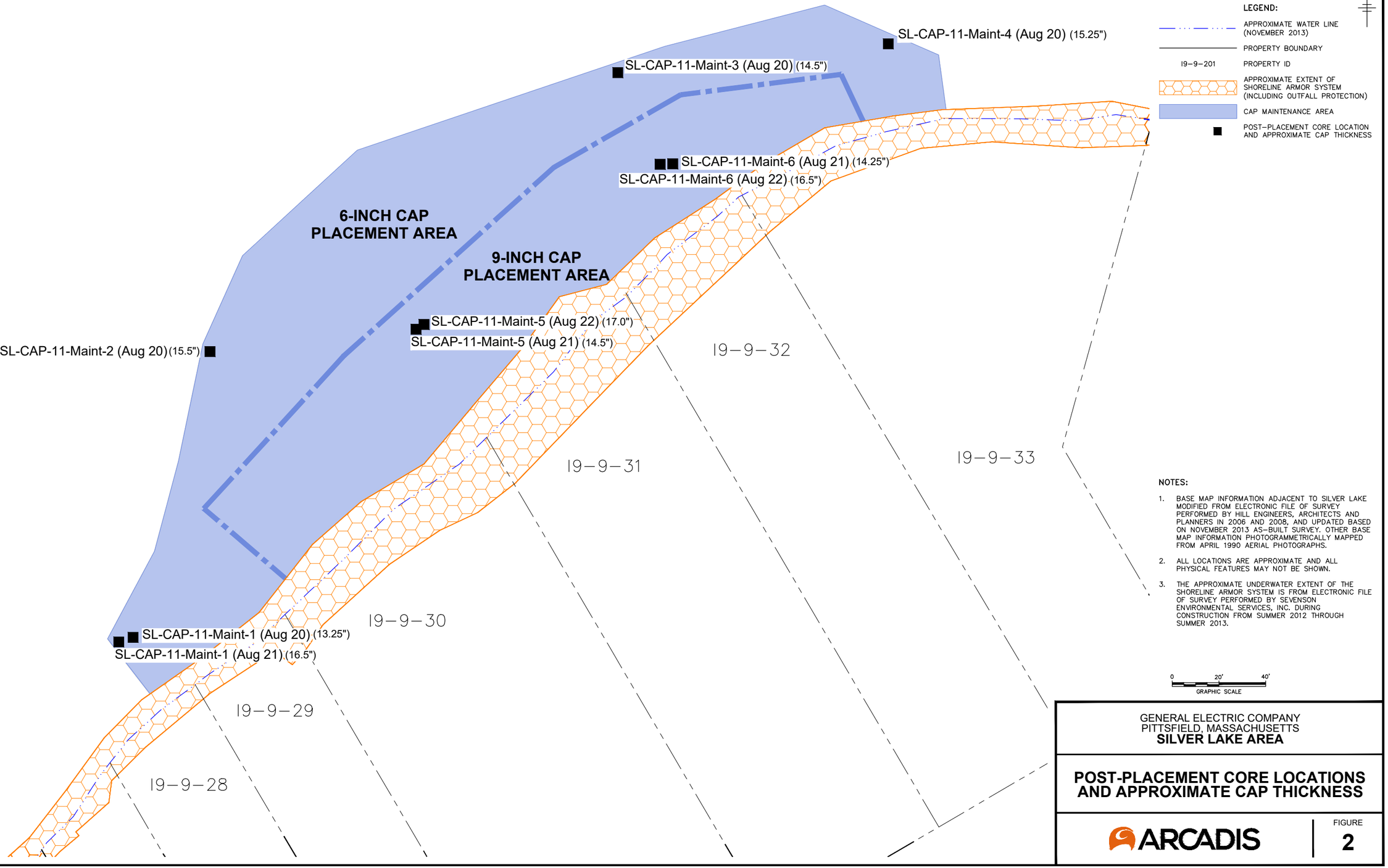
SL-X-BASEMAP



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0 20' 40'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
SILVER LAKE AREA

POST-PLACEMENT CORE LOCATIONS AND APPROXIMATE CAP THICKNESS

ARCADIS

FIGURE
2

Attachment 1

Cap Material Testing Results

Table 1
Potential Cap Material - Source Testing
Silver Lake Area - Pittsfield, MA

Location ID: Date Collected:	Units	NSG-1T-072825-1 7/28/2025
GenChem		
Percent Solids	%	85.9
Total Organic Carbon	mg/kg	13400
Total Organic Carbon	%	1.3%

Notes:
1. Sample was collected by Arcadis and submitted to SGS Analytical for analysis.

Advance Testing

3348 Route 208, Campbell Hall, NY 10916
Phone: 845-496-1600 Fax: 845-496-1398
12960 Commerce Lake Drive, A14, Fort Myers, FL 33913
42 Day Farm Road, West Stockbridge, MA 01266
1813 State Route 7, Harpursville, NY 13787
877 US-4, Schuylerville, NY 12871

Client:	**Nichols Sand & Gravel**	**Project:**	2025 Quality Control
Item:	GE Topsoil	**Project Number:**	250469
Source:	Nichols Sand & Gravel	**Lab Number:**	25-1034A
Date Sampled:	7/29/2025	**Sampled By:**	Client
Date Tested:	8/1/2025	**Tested By:**	Ethan Hart

GRADATION (SIEVE ANALYSIS) OF SOIL OR AGGREGATE

Test Method(s): ASTM D422, C136, C117; AASHTO T88, T27, T11

Lab Number	Sample Type	Sampling Location	Specification
25-1034A	GE Topsoil	Stockpile	No Specification

Sieve Size		%	%	Spec. %	
mm	Inches	Retained	Passing	Pass	
100.0 mm	4"	0.0	100		
75.0 mm	3"	0.0	100		
63.0 mm	2 1/2"	13.3	87		
50.0 mm	2"	8.5	78		
37.5 mm	1 1/2"	5.1	73		
25.0 mm	1"	4.9	68		6.7
19.0 mm	3/4"	3.3	65		4.5
12.5 mm	1/2"	6.4	59		8.8
6.3 mm	1/4"	12.3	46		16.8
4.75 mm	#4	4.9	41		6.7
2.00 mm	#10	9.0	32		12.3
0.850 mm	#20	7.3	25		10.1
0.600 mm	#30	3.4	22		4.7
0.425 mm	#40	2.2	19		3.0
0.150 mm	#100	9.0	10		12.3
0.075 mm	#200	4.9	5.5		6.7
Pan		5.5			7.5

% retained after screening

43% gravel

49% sand

8% silt/clay

Comments:

Minus #200 by wash-sieve method.

Report Reviewed By Emily J. Rodriguez

The simple acceptance/rejection decision rule is utilized to determine in-tolerance and out of tolerance or pass/fail conditions and no measurement of uncertainty is applied in this determination.

PDF

Attachment 2

Photograph Log

Photograph Log

GE-Pittsfield/Housatonic River Site
Silver Lake Area (GECD600)
2025 Cap Maintenance Summary Report

Photograph: 1

Description: Mobilization of equipment

Date: 8/11/2025

Photograph: 2

Description: Mobilization of equipment

Date: 8/12/2025

Photograph Log

GE-Pittsfield/Housatonic River Site
Silver Lake Area (GECD600)
2025 Cap Maintenance Summary Report

Photograph: 3

Description: Cap placement activities

Date: 8/14/2025

Photograph: 4

Description: Cap placement activities

Date: 8/14/2025

Photograph Log

GE-Pittsfield/Housatonic River Site
Silver Lake Area (GECD600)
2025 Cap Maintenance Summary Report

Photograph: 5

Description: Arial view of cap placement activities

Date: 8/14/2025

Photograph: 6

Description: View of staging area during cap placement activities

Date: 8/15/2025

Photograph Log

GE-Pittsfield/Housatonic River Site
Silver Lake Area (GECD600)
2025 Cap Maintenance Summary Report

Photograph: 7

Description: Cap placement activities

Date: 8/18/2025

Photograph: 8

Description: Arial view of cap placement activities

Date: 8/21/2025

Photograph Log

GE-Pittsfield/Housatonic River Site
Silver Lake Area (GECD600)
2025 Cap Maintenance Summary Report

Photograph: 9

Description: Demobilization of equipment/materials

Date: 8/25/2025

Photograph: 10

Description: View of similar water clarity on both sides of turbidity curtain, after completion of cap placement activities and before removal of turbidity curtain

Date: 8/25/2025

Photograph Log

GE-Pittsfield/Housatonic River Site
Silver Lake Area (GECD600)
2025 Cap Maintenance Summary Report

Photograph: 11

Description: Restored bank access area

Date: 8/27/2025

Photograph: 12

Description: Replaced large woody debris

Date: 8/27/2025

Photograph Log

GE-Pittsfield/Housatonic River Site
Silver Lake Area (GECD600)
2025 Cap Maintenance Summary Report

Photograph: 13

Description:
Demobilization of equipment/materials and restoration of access area

Date: 8/27/2025