

**Public Input on General Electric's
Conceptual Design Plan for Rail Transload Areas in
Reaches 5 and 6, dated February 20, 2026**

February 2026 – April 2026

Public Input ended on April 16, 2026



DIVISION OF FISHERIES & WILDLIFE

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April 16, 2026

Josh Fontaine

EPA New England, Region I

5 Post Office Square

Boston, MA 02109-3912

Submitted via email to: Fontaine.Joshua@epa.gov and R1Housatonic@epa.gov

Re: **GE-Pittsfield/Housatonic River Site
Conceptual Design Plan for Rail Transload Areas in Reaches 5 and 6**

To Whom it May Concern:

The Massachusetts Division of Fisheries and Wildlife (Division) is responsible for the conservation of freshwater fish and wildlife in the Commonwealth, including plants and animals state-listed as endangered, threatened or of special concern pursuant to the Massachusetts Endangered Species Act (MGL c. 131A) and its implementing regulations (321 CMR 10.00) (MESA). In fulfilling this role, the Division, through its Natural Heritage and Endangered Species Program, is responsible for administering the MESA as well as the certification of Vernal Pools pursuant to the Wetlands Protection Act Regulations (310 CMR 10.00) (WPA). The purpose of the MESA is to conserve and protect state-listed rare species and their habitats, and to provide a framework for review of projects or activities proposed within mapped Priority Habitat. The Division notes that MESA has been identified as an Applicable and Relevant or Appropriate Requirement (ARAR) by the Environmental Protection Agency (EPA) with respect to Rest of River (ROR) Remediation.

To conserve and manage freshwater fish and wildlife resources for the benefit of the citizens of the Commonwealth, the Division also owns and manages over 240,000 acres of conservation land in Massachusetts. The Division manages and provides wildlife-dependent recreational opportunities for the public on Wildlife Management Areas (WMAs), including hunting, fishing and trapping.

The Division has received and reviewed the General Electric's (GE) Conceptual Design Plan for Rail Transload Areas in Reaches 5 and 6 (Plan) and appreciates the opportunity to provide the following comments regarding impacts to species, their habitats, WMAs, and the public's ability to enjoy the resources under the Division's stewardship.

In addition to the site-specific comments below, the Division has several general comments on the Plan. The Division requests that all on-the-ground disturbance within Priority Habitat be georeferenced for accurate accounting of impacts. Additionally, the Division requests that any deviation from final

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approved plans within Priority Habitat regardless of ownership be reported to the Division as soon as the deviation occurs. Construction upgrades and increased use of the rail transload area's during implementation of remediation activities has the potential to introduce and or contribute to further spread of invasive species. Therefore, GE should develop and implement a plan for (a) avoiding and minimizing introduction and further spread of invasive species within and outside of the project area during construction and use of the rail transload areas; and (b) monitoring and control of any introduction or spread of invasive species that does occur. Finally, the Division once again notes that site-specific rare species information must be omitted from public documents, as such information is protected from disclosure under Massachusetts law. Site-specific locality information can directly jeopardize rare species due to illegal collection, harvest, or disturbance.

Massachusetts Endangered Species Act (MESA)

1. Utility Drive Temporary Rail Transload Area

The Division continues discussions with GE to evaluate potential short- and long-term, *direct and indirect* impacts to state-listed species and their habitats. Remediation activities in Reach 5A – including but not limited to construction and use of this rail transload area – are expected to result in a Take of state-listed species and their habitats. Therefore, we have also begun discussions with GE to develop an appropriate conservation and management plan to avoid, minimize and mitigate impacts to state-listed species and habitats within Reach 5A.

Based on our review of the Plan, the Division requests that impacts to habitat be minimized by moving all loading / staging areas and associated activities west of the proposed rail spur. The Plan only illustrates the loading area associated with the rail spur, but does not show the entire limit of work (including but not limited to staging areas) and associated direct and indirect impacts. Staging areas appear to expand the rail transload area by approximately 4 times and are largely within the 100-year floodplain (as depicted in the 4/9/26 Public Meeting slides), an area particularly vulnerable to soil compaction from heavy-equipment traffic. Restoration of soil permeability to reverse anticipated soil compaction is not addressed in the Plan, even though "*compacted structural fill or use of another stabilization technique (e.g., geogrid) will be required in some areas to support the rail transload area infrastructure (e.g., railroad bed, support area)*" (p. 13). Soil compaction resulting from construction and use of the rail transload area may result in altering hydrological connections important to floodplain habitats, and therefore may not constitute a temporary impact without minimizing and restoring unavoidable impacts to soil permeability.

Additionally, once this rail transload area is constructed the habitat west of the rail spur becomes fragmented from adjacent habitats and unusable for many species. When the size of the staging areas and habitat fragmentation west of the proposed rail spur are considered, actual impacts to some state-listed species and their habitats will likely be closer to 400-600% larger than what is depicted in the Plan. For these reasons, we request that all activities, including staging and loading, be restricted to the area west of the rail spur, and that the entire rail transload area be shifted west to the greatest extent possible. This would be an important step towards reducing impacts at this site, since "*a significant*

amount of earthwork will be required to create a level and usable area for the Utility Drive rail transload area, with both cut and fill activities anticipated across portions of the site” (p. 13).

2. Woods Pond Spur Rail Transload Area

Construction upgrades and or increased use of the site during subsequent remediation activities may result in direct or indirect impacts to state-listed species through disruption of key behaviors (e.g. nesting, breeding, foraging) within known habitats directly adjacent to the site. This is of particular concern for state-listed marsh birds and bald eagles, which can be highly sensitive to noise. We anticipate a conservation and management plan to avoid, minimize and mitigate impacts to affected species may be required for construction and use of this site.

George Darey Housatonic Valley Wildlife Management Area

The Division has previously described the importance of the George Darey WMA for public recreation, a primary purpose for which the land was conserved. Construction and use of the Utility Drive rail transload area will functionally eliminate access to approximately 170 acres of the WMA for several years. This is a loss for hunters, birders, naturalists, outdoor enthusiasts, and neighbors who frequently visit the WMA. The Plan does not include a method for analyzing or mitigating for this loss. We recognize that effectively quantifying recreational use of the WMA would require monitoring that would extend beyond the current project timeline due to seasonal variation. Therefore, we request that GE continue consultation with the Division to both develop and implement an appropriate mitigation plan to offset this loss of public use and access.

If you have any questions about the Division’s comments, please contact Dr. Everose Schlüter, Acting Director, at eve.schluter@mass.gov. The Division appreciates the opportunity to comment.

Sincerely,



Everose Schlüter, Ph.D.

Acting Director

Massachusetts Division of Fisheries & Wildlife



CITY OF PITTSFIELD

DEPARTMENT OF COMMUNITY DEVELOPMENT
CITY HALL, 70 ALLEN STREET, RM 205, PITTSFIELD, MA 01201

April 7, 2026

Alex Carli-Dorsey
Remedial Project Manager
US EPA Region 1
Superfund and Emergency Management Division
5 Post Office Square | Boston, MA 02109

Re: *Rest of River Reach 5A Conceptual Rail Transload Area Plan Comments*

Dear Alex:

The City of Pittsfield appreciates the opportunity to provide comments on the *Rest of River Conceptual Rail Transload Area Plan* which presents the proposed design for the Reach 5A Utility Drive and Woods Pond Spur rail transload areas and provides a conceptual plan for each of these areas. The need for rail transload areas to be incorporated into the Rest of River waste management strategy resulted from review and revision of the On-Site and Off-Site Transportation and Disposal Plan, which evaluated three possible waste transportation methods (truck, hydraulic and rail).

The On-Site and Off-Site Transportation and Disposal Plan has been of particular interest and concern to the residents of Pittsfield because of safety concerns associated with the transport of hazardous waste. In general, the City agrees that the Conceptual Rail Transload Area Plan fulfills the requirements set forth within the Statement of Work (SOW) and Revised Final Permit. Our comments focus on areas of community concern such as safety, quality of life concerns and impacts on natural resources.

General Electric (GE) and the City of Pittsfield will need to establish a formal agreement to govern GE's use of city-owned property for access to the rail line required for their ongoing work. Such an agreement will clearly define responsibilities, access rights, and conditions of use, ensuring transparency and protection of public interests. It will also help coordinate logistics and minimize disruptions to city operations.

From the Plan, the proposed Utility Drive rail transload area will undergo significant earthwork to make it a viable site. As such, it seems prudent to review historic environmental site assessment information documenting the occurrence of any known past spills. Additionally, Section 4 of the document describes the design process and considerations. The document states that, "During construction and operation of

each rail transload area, construction-phase controls and monitoring will be implemented, including oversight, implementation of quality assurance/quality control measures, typical site controls (e.g., erosion controls).” However, the document does not provide any details describing the monitoring or oversight that would be conducted. Section 4.2 describes the site preparation and stormwater management approaches for the rail transload construction. As stated within the document, “A significant amount of earthwork will be required to create a level and usable area for the Utility Drive rail transload area, with both cut and fill activities anticipated across portions of the site.” The scope of earthwork for the Utility Drive rail transload area raises several questions:

- It is not clear if there is enough surface area within this transload area to provide storage for stockpiled surface soil, managed storage containers, transload traffic and transload operations.
- The proposed construction footprint will add impermeable surfaces that will affect stormwater pathways and volumes. It is not clear if the existing culverts are sized appropriately to manage the existing baseline flows and any anticipated additional stormwater flows.
- The document acknowledges that portions of the access road and supporting/loading area are within the footprint of the 100-year floodplain defined by the Federal Emergency Management Agency (FEMA), and therefore these areas are elevated to address flood concern. However, the potential flooding attributable to climate change is not mentioned.

Section 4.2.7 describes habitat impacts as well as measures to address them and habitat restoration considerations. The design approach for the Utility Drive rail transload area provides a comprehensive approach to avoid impacts to the existing wetlands. The impacts addressed are associated with the surface intermittent drainage (surface water) which is hydrologically connected to the wetland. The potential impacts created by the significant earthwork and subsequent effects to groundwater are not described. Given that groundwater is relatively shallow and likely a source of hydrology to the wetland, it may be prudent to manage groundwater as a resource (to the wetland) if the opportunity arises.

Section 6 describes the schedule and next steps for the rail transload area design activities. As stated in this section, “if at any time during the ROR RA [Rest of River Remedial Action] use of rail transport for material disposal cannot match target production rates for sediment and soil removal...truck transport will be utilized to supplement rail transport and convey removed materials for disposal.” The increased use of truck transport is a concern expressed by the community. It is imperative that GE communicate to the community the possible need for increased truck transport and what the threshold is for determining if additional truck transport is needed so that the City can communicate this change.

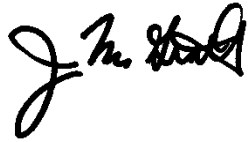
The document provides a comprehensive and concise summary of the Baseline Restoration Assessment completed for both rail transload areas. Appendix C provides a quantitative summary of the surface area composition of each habitat type within each rail transload area. However, the document does not provide quantitative estimates of habitat disturbance resulting from the rail transload construction earthwork. It would be useful to understand the quantitative impacts to each habitat type to better understand the implications to important species.

The future use of each rail transload area will be coordinated with the property owner and others at a future date when Rest of River waste transport is completed. It seems important that each area be sampled – and in the case of Pittsfield the approach driveway at the WWTP - to determine if any residual PCB-contaminated materials remain that could have been released due to incidental spills or release of dust.

This document does not mention whether post-use sampling will be completed to determine if the areas themselves require any remedial action.

Thank you for the opportunity to provide comments on this required Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "J. McGrath". The signature is stylized and cursive.

James McGrath
Park, Open Space, and Natural Resource Program Manager



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

R. Christopher Brittain,
Town Administrator

April 10, 2026

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

Dear Mr. Fontaine:

On behalf of the Select Board and PCB Advisory Committee, please see the following comments from the Town of Lee regarding the Conceptual Design Plan for Rail Transload Areas in Reaches 5 and 6.

1. The document summarizes the proposed locations for two of the rail transload areas necessary for rail transport of waste materials. It appears that the selection for each area is well founded; however, it is unclear if the required construction disturbances will pose an exposure of concern to the construction workers themselves or to any immediately adjacent communities.

Both areas are outside of targeted cleanup areas (e.g., the 1 milligram per kilogram [mg/kg] PCB soil isopleth); however, the Utility Drive rail transload area encompasses Exposure Area (EA) 12, which has PCB concentrations ranging from 1.1 to 10 mg/kg in the top one foot of surficial soil (up to one foot bgs). As a precautionary measure, it may be useful to collect soil samples for PCB screening prior to construction efforts. Given the amount of ground disturbance anticipated for construction of the rail transload features, it may be useful to understand this baseline soil conditions to design appropriate air monitoring.

The Town would like to know if the existing PCB concentrations in soil at EA 12 are of potential exposure concern for construction personnel, and requests that additional soil samples be collected in order to more thoroughly understand baseline PCB concentrations at each proposed rail transload area prior to the start of construction.

2. Both rail transload areas are associated with existing railways. The proposed Utility Drive rail transload area will undergo significant earthwork, while the Woods Pond area will receive less substantial materials management. Regardless of the amount

of earthwork to be accomplished, it seems prudent to review historic environmental site assessment information documenting the occurrence of any known past spills. Rail transportation can inadvertently release and/or spill materials over time, which may pose a concern given the proposed forthcoming construction. The Massachusetts Department of Environmental Protection (MassDEP) maintains a comprehensive public record of over 44,000 hazardous material and petroleum spill sites since the mid-1980s. This could be a resource for identifying any historical spills.

The Town recommends that both rail transload areas should be screened using standard environmental site assessment database review techniques to determine if the areas encompass historic spills or other sources of hazardous constituents.

3. The Conceptual Rail Transload Area Plan provides a good summary of the consultations with relevant parties (Section 2.5, pdf pages 15-16). A summary of coordination with Massachusetts Department of Transportation (MassDOT) describes efforts pertaining to the railroad conceptual design. However, it is not clear if MassDOT evaluated the additional truck traffic impacts associated with each rail transload area. Since each area is a focal point for materials transport, it seems important to determine if these rail features will create traffic patterns of concern.

The Town would like to know if MassDOT evaluated potential truck traffic impacts attributable to the rail transload areas.

4. Section 4 of the document describes the design process and considerations. The document states that, “During construction and operation of each rail transload area, construction-phase controls and monitoring will be implemented, including oversight, implementation of quality assurance/quality control measures, typical site controls (e.g., erosion controls).” However, the document does not provide any details describing the monitoring or oversight that would be conducted.

The Town would like further information that describes the monitoring and oversight procedures to be followed.

5. Stockpiling surface soils is a part of the site preparation steps described within Section 4.0. In addition, storage features such as containers will be maintained within the rail transload areas. It may be useful to the community if these stockpiles and storage features could be placed within the area to minimize disturbance from noise and light.

The Town requests that rail transload stockpiles and features could be placed to minimize variables such as noise and light which can impact community quality of life.

6. Section 6 describes the schedule and next steps for the rail transload area design activities. As stated in this section, “if at any time during the ROR RA [Rest of River Remedial Action] use of rail transport for material disposal cannot match target production rates for sediment and soil removal...truck transport will be utilized to supplement rail transport and convey removed materials for disposal.” This assumption has been reviewed and approved within the Revised On-Site and Off-Site Transportation and Disposal Plan. However, the increased use of truck transport is a concern expressed by the community. It may be useful if GE were to communicate to the community the possible need for increased truck transport and what the threshold is for determining if additional truck transport is needed so that they are aware of this change.

The Town requests to be alerted when GE needs to revert to the use of truck transport due to capacity management issues related to rail transport, and what conditions may trigger this need.

7. Appendix B provides the Geotechnical Evaluation Report for Rail Transload Areas in Reaches 5 and 6. Table 2-1 (pdf page 76) summarizes groundwater levels in borings at both rail areas showing levels ranging from 10.5 to 11.7 feet bgs for the Utility Drive rail transload area and 5.0 to 6.4 feet bgs for the Woods Pond Spur rail transload area. At the Utility Drive rail transload area it is anticipated that substantial cut and fill efforts will be required. Section 4.2 of the Appendix states encountering groundwater is not anticipated. It seems possible however that groundwater may intrude into cut features and require management, which is not described in detail within this Appendix.

The Town requests further information that describes the methods by which encountered groundwater will be managed.

8. The document provides a comprehensive and concise summary of the Baseline Restoration Assessment completed for both rail transload areas. Appendix C provides a quantitative summary of the surface area composition of each habitat type within each rail transload area. However, the document does not provide quantitative estimates of habitat disturbance resulting from the rail transload construction earthwork. It would be useful to understand the quantitative impacts to each habitat type to better understand the implications to important species.

The Town requests that the document be revised to include quantitative estimates of rail transload design surface area impacts to each habitat type located within the transload areas.

10. Results of the Baseline Restoration Assessment for both the Utility Drive and Woods Pond Spur rail transload areas concluded that both areas can provide habitat for the monarch butterfly (*Danaus plexippus*), which the U.S. Fish and Wildlife Service proposed for federal listing as an endangered species in 2024. The rare butterfly surveys confirmed the presence of host plants but no adult rare butterflies were observed. Given the amount of current invasive plant species coverage within the two areas, it may be useful to eradicate the invasive species and create mitigation opportunities for the monarch butterfly, if needed.

The Town would like to know if using the monarch butterfly as a target mitigation species would be appropriate.

11. The Baseline Restoration Assessment activities included marsh bird surveys to determine the presence or absence of the American bittern or common gallinule during breeding seasons since these species have state-level protection. It should be noted that most nesting birds are protected in the United States by federal law, primarily the Migratory Bird Treaty Act (MBTA). It is illegal to destroy, possess or move an active nest—one containing eggs or chicks—without a permit from the U.S. Fish and Wildlife Service. The MBTA is not listed as an Applicable or Relevant and Appropriate Requirement (ARAR) for the Rest of River in Section 3 of this document; however, an inventory of bird nests prior to construction activities may be useful to identify trees to avoid during construction.

The Town requests that bird nest inventories be accomplished immediately prior to construction to identify features to avoid.

12. The future use of each rail transload area will be coordinated with the property owner and others at a future date when Rest of River waste transport is completed. It seems important that each area be sampled to determine if any residual PCB-contaminated materials remain that could have been released due to incidental spills or release of dust. This document does not mention whether post-use sampling will be completed to determine if the areas themselves require any remedial action.

The Town requests that rail transload media (such as soils) be sampled for PCB content to ensure that the areas are not contaminated from the historic waste management activities, and to determine if any removal actions are warranted.

13. Section 4.0, pdf page 10 of the document states that, “During construction and operation of each rail transload area, monitoring and controls will be implemented in accordance with the Revised Quality of Life Compliance Plan (Anchor QEA and Arcadis 2024) and the Ambient Air Monitoring Plan (Appendix G of GE’s revised POP)...which will include monitoring for airborne particulate matter, meteorological conditions, noise and (where necessary) lighting and odor.” The community is the most familiar with the area and may be able to provide the insightful selection of appropriate monitoring stations for rail transload air quality and any other quality of life parameters.

The Town requests the ability to provide more input about the proper placement of air monitoring and any other quality of life monitoring that is appropriate for the rail transload areas.

14. The document provides a thorough analysis and foundation for the proposed rail transload areas. These two areas will serve as focal points for the movement of wastes from both Reaches 5 and 6 within the Rest of River. The document intends to focus on Reach 5A wastes yet fails to consistently mention the association with Reach 6 waste materials. This may be due to the minimal amount of Reach 6 waste material volume that will be managed. It may be useful to the community to provide a table summarizing the Reach-specific types and sources of wastes to be managed at each transload area.

The community requests a summary of the Reach-specific types and sources of wastes to be managed at each transload area can be summarized within the document.

Sincerely,

A handwritten signature in black ink, appearing to read 'RCS', is centered below the word '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

April 16, 2026

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

[VIA EMAIL: Fontaine.Joshua@epa.gov]

Re: Town of Lenox Comments, Conceptual Design Plan for Rail Transload Area

Dear Mr. Fontaine and EPA staff:

The Town of Lenox submits this letter to communicate its concerns and comments regarding the Conceptual Design Plan for a Rail Transload Area in Reaches 5 and 6 (Arcadis/AECOM, February 2026) as it relates to the remediation of polychlorinated biphenyls (PCBs) in the Housatonic River. This facility, to be located in Lenox Dale and on the private property of the Berkshire Scenic Railway Museum, Inc., is intended to transfer PCB contaminated materials from train to truck and vice versa. Lenox recognizes that, while the remedy selection process is over, the implementation of the Rest of River permit is a critical step. Lenox and Lenox Dale will be impacted by the construction activity of the Upland Disposal Facility (UDF), the construction and operation of the rail yard, related vehicle traffic and the eventual operational activity of the Rest of River project. These actions will affect the quality of life for our residents that live near and/or use the public ways in the Woods Pond Area. Moreover, the Woods Pond Transload area will continue to be used even after the reaches of the Housatonic River within the Town of Lenox have been remediated. As such, it requires the focus of the Town's attention and that of EPA Region 1.

The Town of Lenox has engaged Weston & Sampson as an independent third party for the purpose of evaluating various aspects of the Rest of River project and has aided the Town in the preparation of this letter. The Town supports efforts to improve the local railroad infrastructure for the transport of dredged sediments to the Upland Disposal Facility (UDF). Use of rail will reduce the need for trucks which is an important concern for the Town and our residents. The Town realizes that this is a Conceptual Design Plan for the rail transload areas and not an operations manual for these facilities while they are in use. However, the Town desires that the Woods Pond Rail Yard and the general facility where transload operations will occur within our community, not be negatively impacted by operations and any potential releases or spills that may occur during the handling and storage or PCB-impacted materials.

Table 3-1 of the Design Plan lists applicable or relevant and appropriate requirements (ARARs) considered for the design. The PCB Spill Cleanup Policy found in the federal PCB regulations, Code of Federal Regulations, Chapter 40, Part 761, Subpart G is mentioned as "to be considered" in that Table. This is the only mention of the PCB spill policy and spill response in the document.

The Town is requesting that any operational plans for the rail transload area include specific spill response requirements. The Town also requests that spill response requirements be included in the design of the Rail Transload Areas (e.g., construction of temporary waste storage areas for PCB wastes generated during spill response activities). Overall, Lenox and its technical consultant have found the proposed design to be acceptable, notwithstanding the absence of a specific spill response in the design plan.

Thank you in advance for your consideration and we look forward to a favorable response.

Sincerely,



Jay R. Green
Town Manager



Technical Assistance Services *for* Communities GE-Pittsfield/Housatonic River Site Comments on Conceptual Design Plan for Rail Transload Areas in Reaches 5 and 6 February 2026

Contract No.: 68HERH21A0018

Call Order Number: 68HERH22F0082 (14.0.0 OSRTI – Regional & Headquarters
TASC/CI Support)

Technical Direction: R1 2.12.14 GE Pittsfield

**Technical Assistance Services for Communities (TASC)
Comments on Conceptual Design Plan for Rail Transload Areas in Reaches 5 and 6
February 2026**

Introduction

This document provides TASC comments on the Conceptual Design Plan for Rail Transload Areas in Reaches 5 and 6 of the GE-Pittsfield/Housatonic River Site. This document is for the Berkshire Regional Planning Commission (BRPC), the city of Pittsfield, Massachusetts Audubon and other entities to use as they develop comments to share with the U.S. Environmental Protection Agency (EPA). TASC does not make comments directly to EPA on behalf of communities. This document review is funded by EPA's TASC program. The contents do not necessarily reflect the policies, actions or positions of EPA.

Pursuant to the Revised Resource Conservation and Recovery Act (RCRA) Permit Modification (Revised Final Permit) issued by EPA to the General Electric Company (GE) on December 16, 2020, for the Rest of River portion of the GE-Pittsfield/Housatonic River site, GE is required to implement EPA's selected remedial action (cleanup plan) to address polychlorinated biphenyl (PCB) contamination in the Rest of River. The cleanup plan includes construction and operation of an on-site Upland Disposal Facility for the disposal of a portion of contaminated materials removed from the Rest of River area.

On October 15, 2024, GE submitted a Revised On-Site and Off-Site Transportation and Disposal Plan describing GE's plans for the transportation and disposal of excavated material from the ROR. GE proposed constructing three rail transload areas (for loading and unloading) to transport excavated materials for disposal. On April 29, 2025, EPA issued a conditional approval letter for the GE's transload rail plan and directed GE to complete pre-design investigations for two of the three proposed transload areas: Utility Drive and Woods Pond Spur. On May 15, 2025, GE submitted a Pre-Design Investigation Work Plan for Rail Transload Areas in Reaches 5 and 6, which EPA conditionally approved on July 24, 2025. The February 2026 Conceptual Design Plan for Rail

Transload Areas in Reaches 5 and 6 (Conceptual Rail Transload Area Plan) presents the findings of these studies.

Summary

The February 2026 Conceptual Rail Transload Area Plan has seven sections:

1. Introduction and Background
2. Summary of Pre-Design Investigations
3. Applicable or Relevant and Appropriate Requirements
4. Design Process and Considerations
5. Supplemental Data Collection
6. Schedule and Next Steps
7. References

In February 2026, GE presented the findings of their pre-design investigations to support the conceptual design for two of three proposed transload areas: Utility Drive and Woods Pond Spur. Investigation into the third proposed transload location at the Rising Pond Property will be undertaken later. All three proposed transload locations are presented in Figure 1. Each rail transload area will include a rail spur or siding and an associated operational area to support the transport and disposal of contaminated materials removed during cleanup.

From July to October 2025, GE completed the following pre-design investigations:

1. Topographic Field Survey: This survey documented existing field conditions (e.g., elevations, drainage features, utilities, and existing rail locations) and overhead wires crossing the Utility Drive property to support detailed design of the rail transload areas. Survey results also informed the selection of appropriate field locations for the soil geotechnical investigation (e.g., to represent areas of anticipated cut and anticipated fill).
2. Soil Geotechnical Investigation: GE performed two soil borings to a depth of about 20-25 feet below the ground surface (bgs) at each of the two proposed transload locations. Soil data such as slope stability, bearing capacity, settlement and other geotechnical performance aspects informed design considerations.
3. Baseline Restoration Assessment: This assessment documented existing ecological conditions at both properties. Components included a wetland survey (where appropriate) and a survey of potential habitat for federally and/or state-listed threatened, endangered, and special concern species.
4. Cultural Resources Survey: GE presented the Phase IB Cultural Resources Survey Report for Reach 6 in January 2026. The survey did not locate any cultural resources or historic structures that could be adversely impacted by cleanup. An aquatic survey remains to be completed in the spring.

Locations for the soil geotechnical investigations and cultural resource survey did not all directly coincide with the proposed location footprint presented in the Pre-Design Investigation Work Plan for Rail Transload Areas in Reaches 5 and 6. This was due to incorporation of new data from the pre-design investigations as it became available, as well as coordination with relevant parties. The Woods Pond Spur transload area will require additional cultural resource survey work. The

proposed conceptual designs for the Utility Drive and Woods Pond Spur rail transload areas are included as Figures 2 and 3 below.

Figure 1: Locations of the Three Proposed Transload Areas

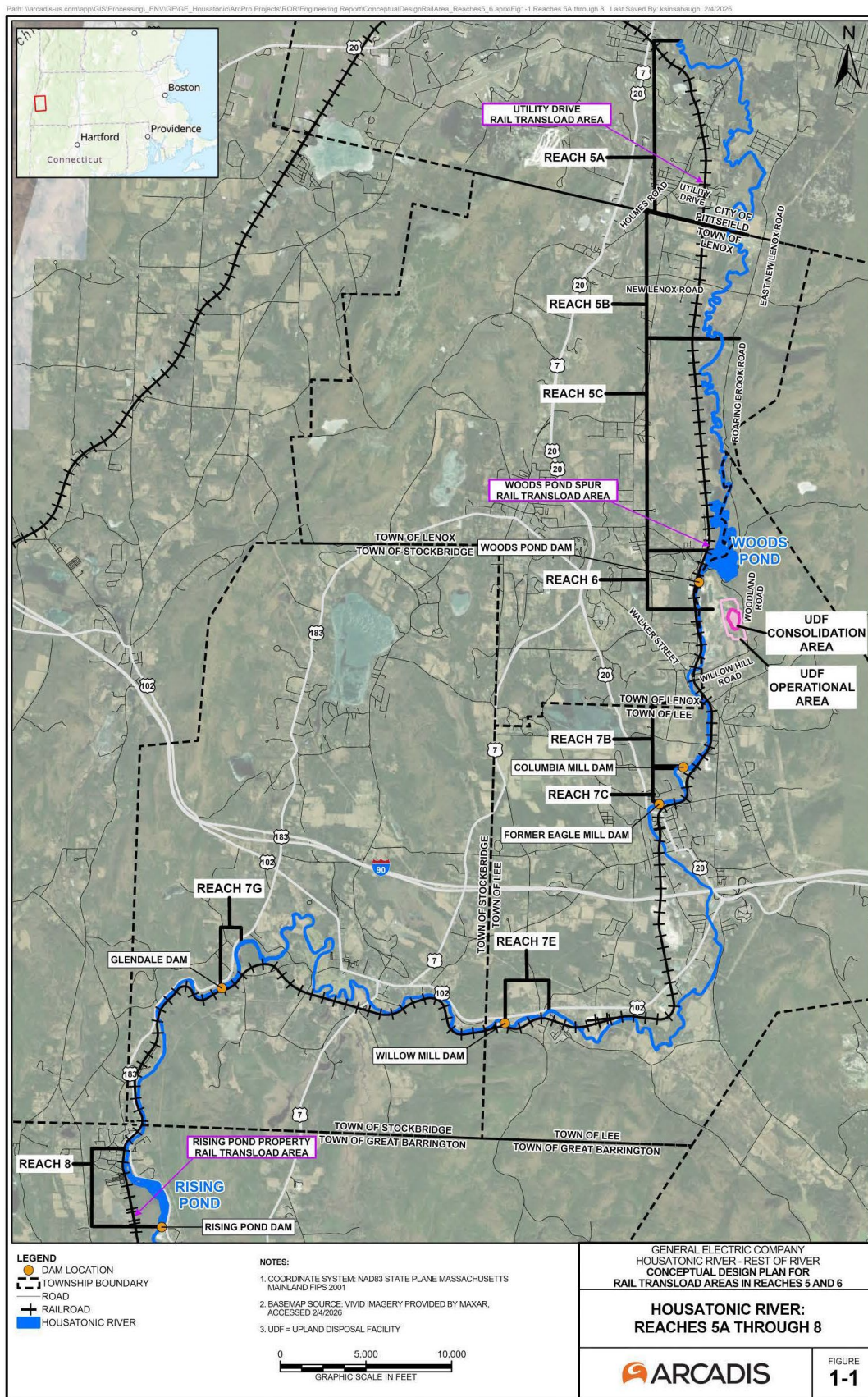


Figure 2: Conceptual Design for Utility Drive Transload Area

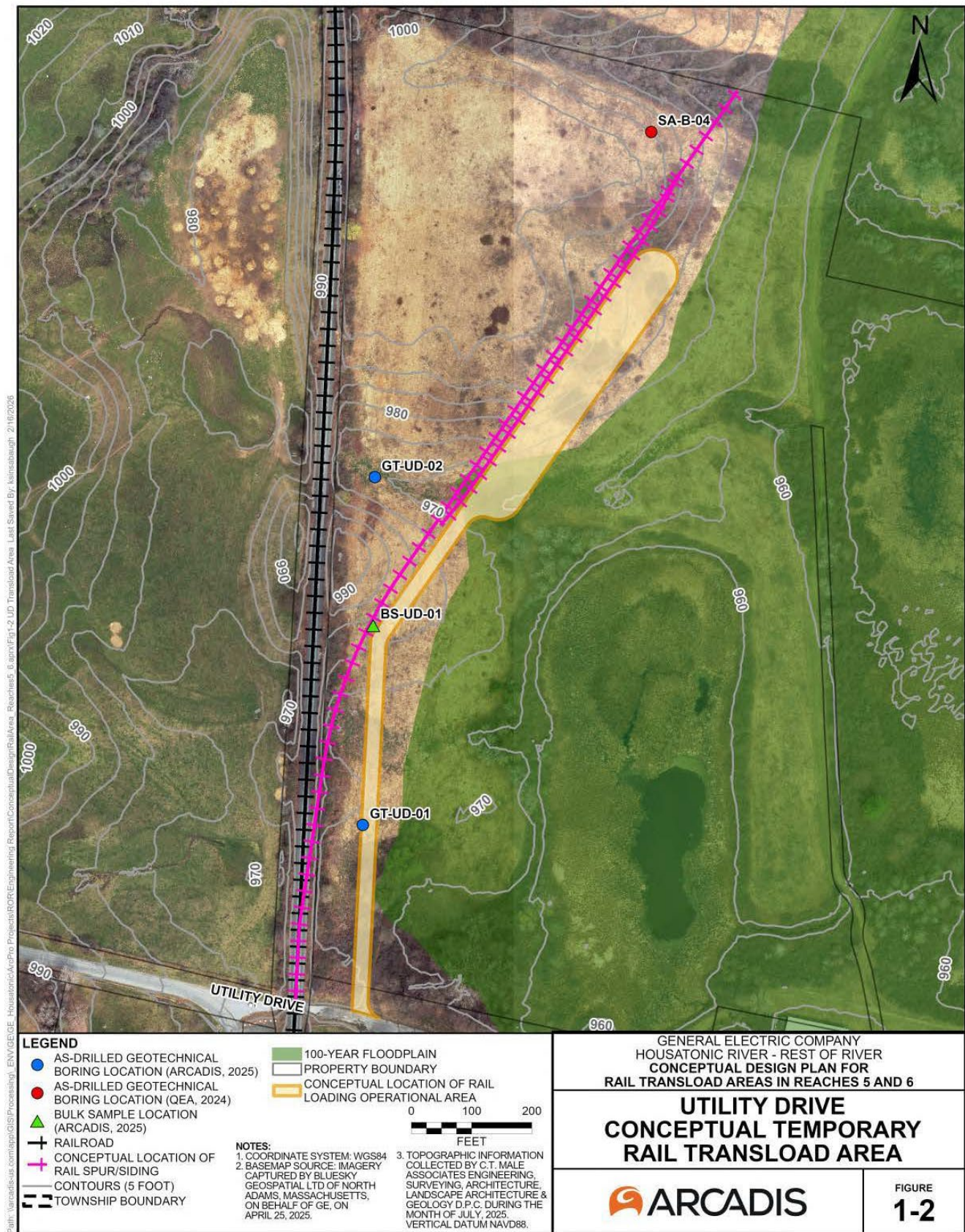
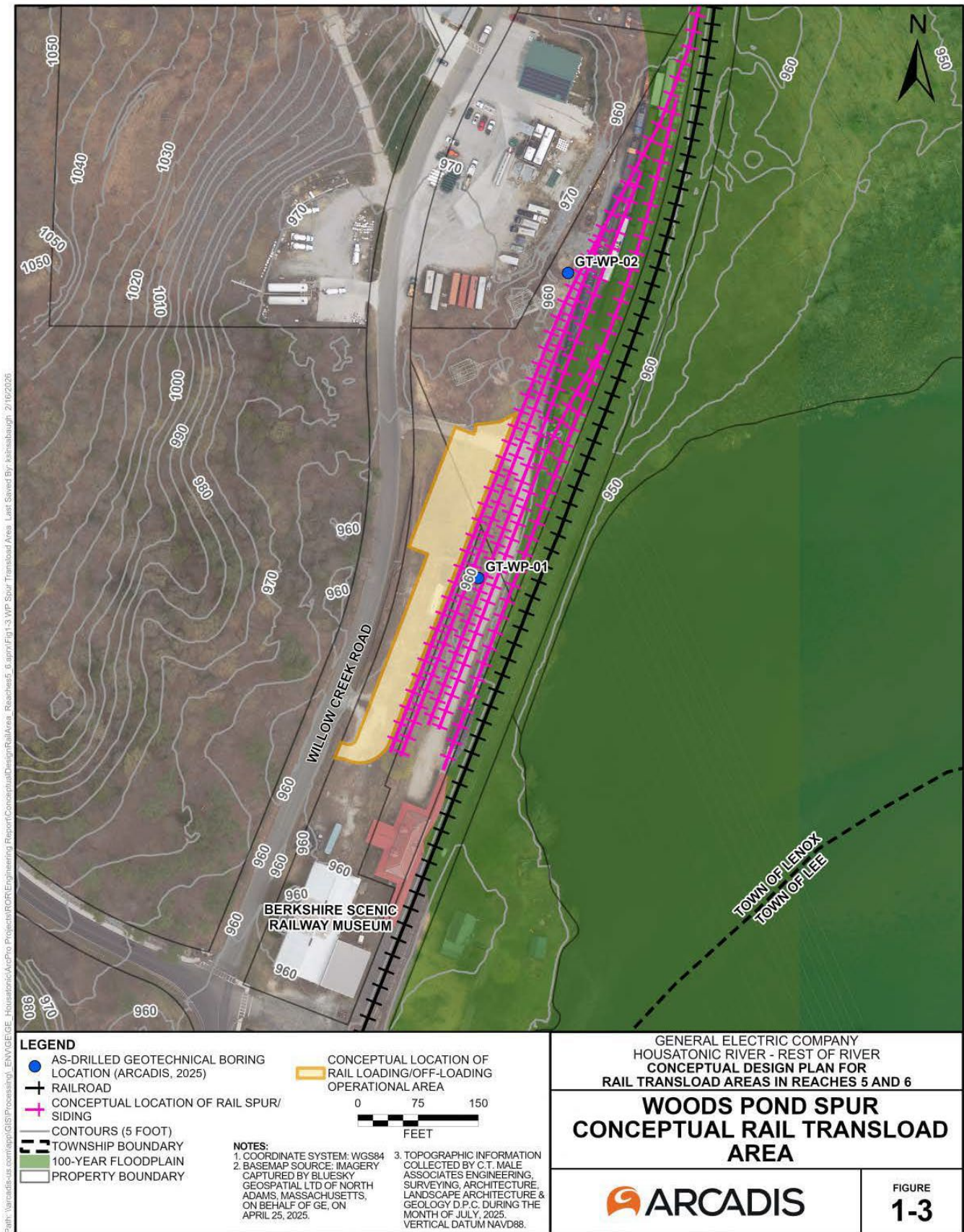


Figure 3: Conceptual Design for Woods Pond Spur Transload Area



TASC Comments

The Conceptual Rail Transload Area Plan presents the proposed design for the Utility Drive and Woods Pond Spur rail transload areas. The document provides a conceptual plan for each of these areas based on pre-design investigation work including topographic field survey, soil geotechnical investigation, baseline restoration assessment and cultural resources surveys. The need for rail transload areas to be incorporated into the Rest of River waste management strategy resulted from review and revision of the On-Site and Off-Site Transportation and Disposal Plan, which evaluated three possible waste transportation methods (truck, hydraulic and rail).

The On-Site and Off-Site Transportation and Disposal Plan has been of particular interest and concern to the community because of safety concerns associated with the transport of hazardous waste. In general, the Conceptual Rail Transload Area Plan fulfills the requirements set forth within the Statement of Work (SOW) and Revised Final Permit. TASC revisited comments provided for previously reviewed documents, such as the Revised On-Site and Off-Site Transportation and Disposal Plan, and focused on areas of community concern such as safety, quality of life concerns and impacts to natural resources.

1. The document summarizes the proposed locations for two of the rail transload areas necessary for rail transport of waste materials. It appears that the selection for each area is well founded; however, it is unclear if the required construction disturbances will pose an exposure of concern to the construction workers themselves or to any immediately adjacent communities.

Both areas are outside of targeted cleanup areas (e.g., the 1 milligram per kilogram [mg/kg] PCB soil isopleth); however, the Utility Drive rail transload area encompasses Exposure Area (EA) 12, which has PCB concentrations ranging from 1.1 to 10 mg/kg in the top one foot of surficial soil (up to one foot bgs).¹ As a precautionary measure, it may be useful to collect soil samples for PCB screening *prior* to construction efforts. Given the amount of ground disturbance anticipated for construction of the rail transload features, it may be useful to understand this baseline soil conditions to design appropriate air monitoring.

The community may want to ask EPA if the existing PCB concentrations in soil at EA 12 are of potential exposure concern for construction personnel, and if additional soil samples should be collected in order to more thoroughly understand baseline PCB concentrations at each proposed rail transload area prior to the start of construction.

2. Both rail transload areas are associated with existing railways. The proposed Utility Drive rail transload area will undergo significant earthwork, while the Woods Pond area will receive less substantial materials management. Regardless of the amount of earthwork to be accomplished, it seems prudent to review historic environmental site assessment information documenting the occurrence of any known past spills. Rail transportation can inadvertently release and/or spill materials over time, which may pose a concern given the proposed forthcoming construction. The Massachusetts Department of Environmental Protection (MassDEP) maintains a comprehensive public record of over 44,000 hazardous

¹ See Figure 3-27a, pdf page 68 of the Pre-Design Investigation Summary Report for Reach 5A Non-Residential Floodplain Exposure Areas (Anchor QEA and Arcadis, 2023).

material and petroleum spill sites since the mid-1980s.² This could be a resource for identifying any historical spills.

The community may want to ask EPA if both rail transload areas should be screened using standard environmental site assessment database review techniques to determine if the areas encompass historic spills or other sources of hazardous constituents.

3. The Conceptual Rail Transload Area Plan provides a good summary of the consultations with relevant parties (Section 2.5, pdf pages 15-16). A summary of coordination with Massachusetts Department of Transportation (MassDOT) describes efforts pertaining to the railroad conceptual design. However, it is not clear if MassDOT evaluated the additional truck traffic impacts associated with each rail transload area. Since each area is a focal point for materials transport, it seems important to determine if these rail features will create traffic patterns of concern.

The community may want to ask EPA if MassDOT evaluated potential truck traffic impacts attributable to the rail transload areas.

4. Section 4 of the document describes the design process and considerations. The document states that, “During construction and operation of each rail transload area, construction-phase controls and monitoring will be implemented, including oversight, implementation of quality assurance/quality control measures, typical site controls (e.g., erosion controls).” However, the document does not provide any details describing the monitoring or oversight that would be conducted.

The community may want to ask EPA if further information can be provided that describes the monitoring and oversight procedures to be followed.

5. Section 4.2 describes the site preparation and stormwater management approaches for the rail transload construction. As stated within the document, “A significant amount of earthwork will be required to create a level and usable area for the Utility Drive rail transload area, with both cut and fill activities anticipated across portions of the site.” The scope of earthwork for the Utility Drive rail transload area raises several questions:
 - It is not clear if there is enough surface area within this transload area to provide storage for stockpiled surface soil, managed storage containers, transload traffic and transload operations.
 - The proposed construction footprint will add impermeable surfaces that will affect stormwater pathways and volumes. It is not clear if the existing culverts are sized appropriately to manage the existing baseline flows and any anticipated additional stormwater flows.
 - The document acknowledges that portions of the access road and supporting/loading area are within the footprint of the 100-year floodplain defined by the Federal Emergency Management Agency (FEMA), and therefore these areas are elevated to

² MassDEP’s Waste Site/Reportable Release Look Up Tool is available online at: www.mass.gov/info-details/using-the-waste-sitereportable-release-look-up-tool.

address flood concern. However, the potential flooding attributable to climate change is not mentioned.

The community may want to ask EPA if the surface area within the Utility Drive rail transload area is sufficient to accommodate all the area activities, if the existing stormwater features are sufficient to address combined stormwater flows in the future and if the design addresses potential flooding-related impacts.

6. Stockpiling surface soils is a part of the site preparation steps described within Section 4.0. In addition, storage features such as containers will be maintained within the rail transload areas. It may be useful to the community if these stockpiles and storage features could be placed within the area to minimize disturbance from noise and light.

The community may want to ask EPA if rail transload stockpiles and features could be placed to minimize variables such as noise and light which can impact community quality of life.

7. Section 4.2.7 describes habitat impacts, measures to address them and habitat restoration. The design approach for the Utility Drive rail transload area provides a comprehensive approach to avoid impacts to the existing wetlands. The impacts addressed are associated with the surface intermittent drainage (surface water) which is hydrologically connected to the wetland. The potential impacts created by the significant earthwork and subsequent effects to groundwater are not described. Given that groundwater is relatively shallow and likely a source of hydrology to the wetland, it may be prudent to manage groundwater as a resource (to the wetland) if the opportunity arises.

The community may want to ask EPA if the groundwater encountered during construction can be managed to sustain the existing wetlands associated with the Utility Drive rail transload area.

8. Section 6 describes the schedule and next steps for the rail transload area design activities. As stated in this section, “if at any time during the ROR RA [Rest of River Remedial Action] use of rail transport for material disposal cannot match target production rates for sediment and soil removal...truck transport will be utilized to supplement rail transport and convey removed materials for disposal.” This assumption has been reviewed and approved within the Revised On-Site and Off-Site Transportation and Disposal Plan. However, the increased use of truck transport is a concern expressed by the community. It may be useful if GE were to communicate to the community the possible need for increased truck transport and what the threshold is for determining if additional truck transport is needed so that they are aware of this change.

The community may want to ask EPA if they can be alerted when GE needs to revert to the use of truck transport due to capacity management issues related to rail transport, and what conditions may trigger this need.

9. Appendix B provides the Geotechnical Evaluation Report for Rail Transload Areas in Reaches 5 and 6. Table 2-1 (pdf page 76) summarizes groundwater levels in borings at both rail areas showing levels ranging from 10.5 to 11.7 feet bgs for the Utility Drive rail transload

area and 5.0 to 6.4 feet bgs for the Woods Pond Spur rail transload area. At the Utility Drive rail transload area it is anticipated that substantial cut and fill efforts will be required. Section 4.2 of the Appendix states encountering groundwater is not anticipated. It seems possible however that groundwater may intrude into cut features and require management, which is not described in detail within this Appendix.

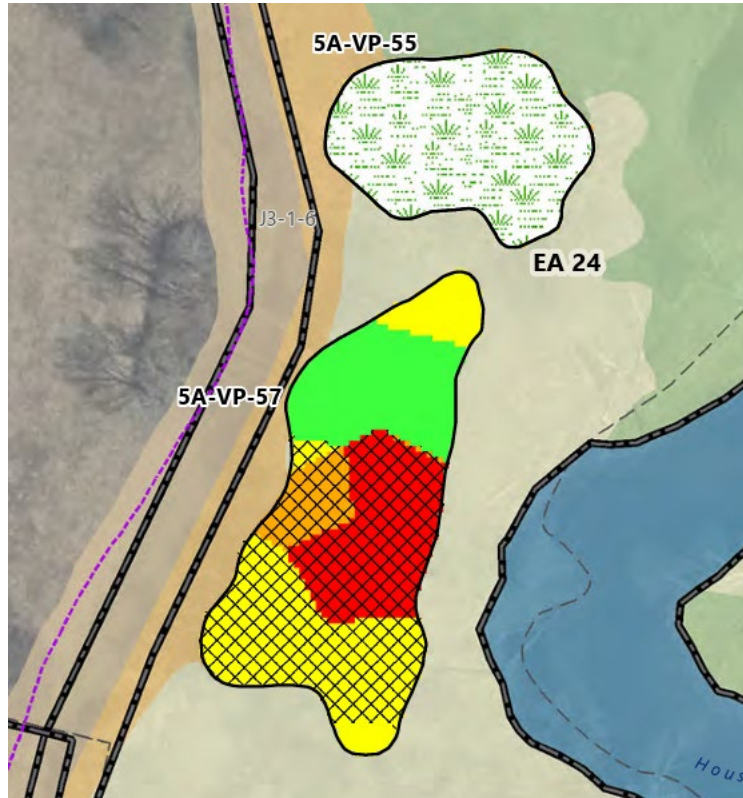
The community may want to ask EPA if further information could be provided that would describe the methods by which encountered groundwater will be managed.

10. The document provides a comprehensive and concise summary of the Baseline Restoration Assessment completed for both rail transload areas. Appendix C provides a quantitative summary of the surface area composition of each habitat type within each rail transload area. However, the document does not provide quantitative estimates of habitat disturbance resulting from the rail transload construction earthwork. It would be useful to understand the quantitative impacts to each habitat type to better understand the implications to important species.

The community may want to ask EPA if the document can be revised to include quantitative estimates of rail transload design surface area impacts to each habitat type located within the transload areas.

11. In regard to vernal pools, the document states, “An evaluation was conducted for the possible presence of vernal pools at both rail transload properties. This evaluation was performed as part of an overall evaluation of potential vernal pools in the Reach 5A floodplain in 2018 and 2019, which included an inspection of wetland areas using procedures employed by the Massachusetts Natural Heritage and Endangered Species Program (MNHESP) for determining whether a pool meets the criteria for a certified vernal pool (AECOM 2020). No potential vernal pools were identified at either the Utility Drive property or the Woods Pond Spur property.” However, it seems important to note that there are several vernal pools immediately adjacent to the Utility Drive rail transload area (Figure 4). While there may not be any vernal pools within the area itself, it seems important to understand the implication of earthwork impacts to the adjacent pools. Of particular concern may be the impacts from construction to the groundwater levels, which could be hydrologically linked to the pools.

Figure 4: Cropped Figure 4-6 Pilot Study Vernal Pools: Test Pools (5A-VP-52; 5A-VP-57); Control Pool (5A-VP-55) Vernal Pool Pilot Study Work Plan Housatonic River – Rest of River (pdf page 59 Anchor QEA, 2023). These pools are immediately to the East of the Utility Drive rail transload area.



The community may want to ask EPA if there is any potential impact to adjacent vernal pools associated with the Utility Drive rail transload area due to construction impacts to groundwater.

12. Results of the Baseline Restoration Assessment for both the Utility Drive and Woods Pond Spur rail transload areas concluded that both areas can provide habitat for the monarch butterfly (*Danaus plexippus*), which the U.S. Fish and Wildlife Service proposed for federal listing as an endangered species in 2024.³ The rare butterfly surveys confirmed the presence of host plants but no adult rare butterflies were observed. Given the amount of current invasive plant species coverage within the two areas, it may be useful to eradicate the invasive species and create mitigation opportunities for the monarch butterfly, if needed.

The community may want to ask EPA if using the monarch butterfly as a target mitigation species would be appropriate.

13. The Baseline Restoration Assessment activities included marsh bird surveys to determine the presence or absence of the American bittern or common gallinule during breeding seasons since these species have state-level protection. It should be noted that most nesting birds are protected in the United States by federal law, primarily the Migratory Bird Treaty Act (MBTA). It is illegal to destroy, possess or move an active nest—one containing eggs or chicks—without a permit from the U.S. Fish and Wildlife Service. The MBTA is not listed as an Applicable or Relevant and Appropriate Requirement (ARAR) for the Rest of River in Section 3 of this document; however, an inventory of bird nests prior to construction activities may be useful to identify trees to avoid during construction.

The community may want to ask EPA if bird nest inventories can be accomplished immediately prior to construction to identify features to avoid.

14. The Phase IB Cultural Resources Survey Report for Reach 6 (AECOM, 2026) documented the historical architectural surveys that included a background review and field surveys of the rail transload areas. The survey of the Woods Pond Spur rail transload area identified one previously identified National Register of Historic Places-listed resource: the Berkshire Scenic Railway Museum. It was determined that the resource would not be adversely affected by the remediation project, including rail transload activities. This conclusion raises several questions as follows:

- The Woods Pond Spur Track Plan and Profile Plan RT-202 (pdf page 62) shows a building associated with the museum that is designated to be “relocated museum shelter.”
- Plan RT-202 shows “bumpers” to be installed to brake railcar movement. These are near with the museum building.
- The use of the rail transload area will introduce additional forms of seismic (ground vibration) disturbance that the historic feature may not be designed to withstand.

The community may want to ask EPA if there are potential impacts to the Berkshire Scenic Railway Museum given the proposed removal of a building, the placement of railcar bumpers adjacent to the building and the introduction of new ground vibration disturbance (truck traffic).

³ Fish and Wildlife Service Proposes Endangered Species Act Protection for Monarch Butterfly; Urges Increased Public Engagement to Help Save the Species: www.fws.gov/press-release/2024-12/monarch-butterfly-proposed-endangered-species-act-protection.

15. The Woods Pond spur rail transload area is immediately adjacent to the Berkshire Scenic Railway Museum. It seems important to install perimeter fencing to preclude trespass and to prevent public contact with this area.

The community may want to ask EPA if GE intends to surround the Woods Pond spur rail transload area with fencing.

16. Trains can ignite fires through sparks generated by brakes, exhaust or faulty equipment. This can happen during emergency braking, or because of wear-and-tear on the brake components. The increased amount of train traffic in the rail transload areas may require additional fire prevention equipment and practices.

The community may want to ask EPA if the rail transload areas will be equipped with fire response equipment.

17. The future use of each rail transload area will be coordinated with the property owner and others at a future date when Rest of River waste transport is completed. It seems important that each area be sampled to determine if any residual PCB-contaminated materials remain that could have been released due to incidental spills or release of dust. This document does not mention whether post-use sampling will be completed to determine if the areas themselves require any remedial action.

The community may want to ask EPA if rail transload media (such as soils) will be sampled for PCB content to ensure that the areas are not contaminated from the historic waste management activities, and to determine if any removal actions are warranted.

18. Section 4.0, pdf page 10 of the document states that, “During construction and operation of each rail transload area, monitoring and controls will be implemented in accordance with the Revised Quality of Life Compliance Plan (Anchor QEA and Arcadis 2024) and the Ambient Air Monitoring Plan (Appendix G of GE’s revised POP)...which will include monitoring for airborne particulate matter, meteorological conditions, noise and (where necessary) lighting and odor.” The community is the most familiar with the area and may be able to provide the insightful selection of appropriate monitoring stations for rail transload air quality and any other quality of life parameters.

The community may want to reach out to EPA and GE about the proper placement of air monitoring and any other quality of life monitoring that is appropriate for the rail transload areas.

19. The document provides a thorough analysis and foundation for the proposed rail transload areas. These two areas will serve as focal points for the movement of wastes from both Reaches 5 and 6 within the Rest of River. The document intends to focus on Reach 5A wastes yet fails to consistently mention the association with Reach 6 waste materials. This may be due to the minimal amount of Reach 6 waste material volume that will be managed. It may be useful to the community to provide a table summarizing the Reach-specific types and sources of wastes to be managed at each transload area.

The community may want to ask EPA if a summary of the Reach-specific types and sources of wastes to be managed at each transload area can be summarized within the document.

20. TASC recently reviewed the Phase IB Cultural Resources Survey Report for Reach 6 (AECOM, 2026). As stated in this document, the planned archaeological survey for aquatic areas and for a submerged floodplain could not be completed as planned and was deferred to spring 2026. Once the remaining aquatic survey activities are completed, the results will be presented in an addendum to the January 2026 Phase IB Cultural Resources Survey Report for Reach 6. The Conceptual Rail Transload Area Plan does not mention this outlying amendment, which may be due to minimal anticipated impacts to aquatic resources attributable to the proposed rail transload designs. Regardless, this document should acknowledge this pending document and summarize whether the findings will affect the rail transload designs.

The community may want to ask EPA if the document should be revised to include information about whether the pending Reach 6 aquatic cultural resource inventory results will affect the rail transload designs.

21. Figure 3 above (Figure 1-3 in the document) shows a pink highlighted near the Berkshire Scenic Railway Museum. However, this feature is not defined in the legend. Furthermore, the figure shows the conceptual location of the rail spur/siding. The scale of the rail makes the lines appear to overlap. It may be useful to adjust the scale of these features.

The community may want to ask EPA if Figure 1-3 can be amended to define the feature associated with the museum and to provide scale to the overlapping rail lines.

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