Public Input on General Electric's Treatability Studies Summary Report for Reach 5A dated February 27, 2026

February 2026 – April 2026

Public Input Period Ended on April 17, 2026

SEMS Doc ID 700802

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 Treatability Studies Summary Report for Reach 5A.

1. The Reach 5A Treatability Studies Summary Report provides a thorough summary of the treatability test methods and results. A considerable amount of time and work has been accomplished toward achieving the start of Reach 5A RD/RA in-field work. As this in-field step approaches, it is a question if any recent RD/RA 'learned lessons' may require additional treatability study assessment. Per the initial treatability studies work plan provided in Appendix H of the Conceptual RD/RA for Reach 5A (Anchor QEA LLC, AECOM and ARCADIS, 2023), this report should present a summary of any identified data gaps. As stated in the work plan, "If alternate methods are identified as the primary means for the in-river work during final design or during an adaptive management process, additional treatability testing may be proposed (e.g., dredging elutriate testing or column-settling testing may be conducted if the in-river sediment removal operations are conducted without any hydraulic controls). Also, additional treatability testing may be proposed after a remediation contractor is selected to refine the contractor's proposed implementation methods."

The Town would like to know what (if any) additional studies are to be conducted and what changes to the initial conceptual Reach 5A RD/RA have occurred to warrant these study needs.

2. The Reach 5A Treatability Studies Summary Report provides a thorough summary of the treatability test results but is lacking information that puts these

results into context for the community. For instance, the report summarizes the gravity drainage studies, which will determine whether additional treatment is required to meet transportation and disposal facility requirements. The "requirements for transportation and disposal" are not defined in the document and are not summarized in comparison with the study results. As a result, it is difficult for a reader to draw conclusions.

The Town requests that the report be amended to summarize the conclusions drawn from each of the treatability studies.

3. The initial Treatability Studies Work Plan for Reach 5A produced as part of the Conceptual RD/RA for Reach 5A (Anchor QEA LLC, AECOM and ARCADIS, 2023) provided a table summarizing the proposed bulk sediment samples to be collected for treatability testing (shown below, taken from pdf page 11 of Appendix H of the Conceptual RD/RA for Reach 5A). EPA and GE acknowledged the differences between the estimated PCB concentrations (Table 3-1) and the actual measured concentrations (Table 2-1); and adjusted PCB concentrations by "spiking" (adding PCBs to increase the concentration) the tested sediments. This is an appropriate approach to accommodate the data gap created by the absence of a bulk sediment with high PCB concentrations. However, it seems that the use of spiked material may present an uncertainty in the results. Spiked materials may be over or under conservative in their production of representative PCB conditions.

The Town would like to know if the use of spiked bulk sample materials introduces a source of uncertainty that is of concern, and if so, EPA's recommended solution is to address this data gap.

4. The treatability studies summarized in the document are founded on samples collected from previous investigations. While those historic samples were collected to capture and characterize typical Reach 5A conditions, the river setting is a dynamic ecosystem that changes over time. As stated in the document, "the amendment dose" (of carbon-based sorptive amendment) may vary in different portions of Reach 5A depending on the level of PCB contamination. As the remedy is being applied (beginning at the start of the Reach 5A footprint and progressing downriver), it seems prudent to take sediment samples in real time to be sure the applied amendment is suitable for the contamination that is present.

The town would like to know if sampling of riverbed sediment will be conducted in real time during RD/RA amendment application to ensure that the amendment remains suitable for the residual contamination that is detected.

5. The forthcoming Final RD/RA Work Plan for Reach 5A will include the results gained from the treatability studies described in the document. It is recommended that this final work plan provide aerial maps showing the chosen amendment doses by river mile and historic PCB concentrations. It would also be useful to see this amendment footprint in relation to erosion measures (if available).

The Town requests that the forthcoming Final RD/RA Work Plan for Reach 5A include aerial maps depicting the riverbed sediment footprint in relation to the historic PCB occurrence, along with any riverbed erosion information.

6. Time is a variable that was tested as part of the treatability studies. For instance, the drainage study involved placing sediment samples within a screen and allowing the sample to drain by gravity for a period of 72 hours. During this period, samples were collected at multiple time intervals (i.e., 6, 24, 48 and 72 hours) from each sample for testing. Results for various tests indicate that the more time allotted for various steps will yield better results. It is difficult to envision how the actual Reach 5A waste collection, treatment and transport will allow for significant time requirements. It would be useful for the forthcoming Final RD/RA Work Plan for Reach 5A to show a timeline of the waste removal, treatment and disposal process that accommodates the treatability study time requirements.

The Town requests that the forthcoming Final RD/RA Work Plan for Reach 5A show a timeline of the Reach 5A waste management process.

7. Section 3.2 of the document summarizes sediment characterization results for the backwater sediment amendment jar testing. The Aroclor PCB concentrations were considerably lower than anticipated based on the Aroclor PCB concentrations measured during earlier pre-design investigation sediment sampling. As a result of these concerning analyses, EPA requested additional analysis to be conducted by a second laboratory. Eventually the discrepancy was resolved. However, this process raises the question about verification sampling in the forthcoming Final RD/RA Work Plan for Reach 5A. If future sampling is to be conducted to verify the remedy, it seems appropriate to conduct aggressive

quality assurance/quality control sampling (e.g., collection of splits, duplicates, oversight samples) to avoid questions and concerns in the final design.

The Town requests that an aggressive quality assurance/quality control program, specifically through oversite samples, is to be integrated into the future remedy verification sampling.

8. The treatability studies summarized within the document were designed to support ongoing remedial design evaluations including possible sediment amendments for the backwater areas. Similar study objectives are being accomplished as part of the vernal pool pilot testing, which is also testing sediment amendments and their ability to sequester PCB contaminants. TASC identified a possible concern related to organic carbon amendment effects to dissolved oxygen in the pilot study vernal pools. Research results indicate that activated carbon application has varying impacts on dissolved oxygen and benthic macroinvertebrate recolonization. Activated carbon may also influence the amount of oxygen in sediment. It may be important to measure sediment oxygen levels of sediment in place with the use of sediment probe instruments to ensure appropriate oxygen levels are available to support benthic macroinvertebrate recolonization once an amended sediment is put in place as part of forthcoming RD/RA activities. It is recommended that sediment pore space dissolved oxygen measurements be taken on a routine basis as part of the RD/RA monitoring program (refer to Neill et al., 2014).

The Town requests that dissolved oxygen levels in sediment and water nutrient levels should be components of the monitoring plan. Benthic macroinvertebrate activity is important for mixing capping and contaminated sediments and exposing PCB to activated carbon for adsorption. The aquatic environment must create conditions for effective benthic macroinvertebrate recolonization.

Sincerely,

R. Christopher Brittain
Town Administrator

BERKSHIRE ENVIRONMENTAL ACTION TEAM
20 Chapel St. Pittsfield, MA 01201 ● thebeatnews.org
(413) 464-9402 ● team@thebeatnews.org

Protecting the environment for wildlife in support of the natural world that sustains us all.

April 17, 2026

EPA via email at R1Housatonic@epa.gov

Re: Treatability Studies Summary Report for Reach 5A

Berkshire Environmental Action Team (BEAT) appreciates this opportunity to provide feedback on the General Electric Company's (GE's) Treatability Studies Summary Report for Reach 5A of the GE-Pittsfield/Housatonic River Site.

BEAT's mission is to work with our community to protect the environment for wildlife in support of the natural world that sustains us all.

Biological availability

EPA and GE have emphasized porewater concentrations as the primary indicator of PCB bioavailability. However, this approach implicitly assumes that dissolved-phase exposure is the dominant—or only—pathway of biological uptake. That assumption is not supported across all receptor types or exposure scenarios.

PCBs tend to bind with organic carbon in sediments and soils. While this sorption reduces dissolved concentrations in porewater, it does not eliminate bioavailability. Many organisms—particularly deposit feeders such as earthworms and benthic invertebrates—directly ingest sediment and organic matter. Through this ingestion pathway, PCBs bound to particles can be desorbed in the gut and absorbed into tissues, providing a direct route of exposure independent of porewater concentrations.

As a result, reliance on porewater alone risks underestimating total bioavailability and subsequent trophic transfer. A more complete conceptual model should account for both dissolved-phase uptake and dietary exposure pathways, particularly where sediment-ingesting organisms form the base of the food web. Ignoring these pathways may lead to an incomplete assessment of ecological and human health risk.

Have there been "lessons learned" in the Reach 5A RD/RA process to justify additional treatability studies. What new information, data gaps, or design uncertainties have emerged that might necessitate further testing?

EPA should require GE to clearly identify any specific additional studies being proposed, including their objectives, methodologies, and how the results will inform remedy selection or final design. Equally important, GE should document what has changed since the initial Reach 5A RD/RA conceptual framework—whether in site conditions, risk assumptions, modeling results, engineering feasibility, or implementation approach—that now might warrant these additional investigations.

As described in Appendix H of the Conceptual RD/RA for Reach 5A (Anchor QEA LLC, AECOM, and ARCADIS, 2023), the treatability studies work plan anticipated that the report would include a summary of identified data gaps. The work plan further states: *"If alternate methods are identified as the primary means for the in-river work during final design or during an adaptive management process, additional treatability testing may be proposed (e.g., dredging elutriate testing or column-settling testing may be conducted if the in-river sediment removal operations are conducted without any hydraulic controls). Also, additional treatability testing may be proposed after a remediation contractor is selected to refine the contractor's proposed implementation methods."*

Given this framework, it is critical to understand whether proposed additional studies would be driven by (1) newly identified data gaps, (2) a shift toward alternative remedial methods, (3) contractor-specific implementation considerations, or (4) insights gained from prior RD/RA phases. Without this clarification, it is not possible to evaluate whether the proposed studies are necessary, appropriately scoped, or consistent with the intent of the original work plan.

Real time sampling

Sampling results have historically shown variability when GE returns to previously sampled locations. Given this variability, will riverbed sediment be sampled in real time during RD/RA amendment application to confirm that the selected amendment remains appropriate for the residual contamination present at each location?

Concern about the impacts of amendments

The treatability studies summarized in this document were designed to inform ongoing remedial design evaluations, including the potential use of sediment amendments in backwater areas. Similar objectives are also being addressed through the vernal pool pilot testing, which evaluates the effectiveness of sediment amendments in sequestering PCB contaminants.

However, TASC has identified a potential concern regarding the effects of organic carbon amendments on dissolved oxygen (DO) levels within treated sediments. BEAT has raised questions about amendments causing changes in pH. Available research indicates that activated carbon can have variable impacts on both dissolved oxygen concentrations and benthic macroinvertebrate recolonization. In addition, activated carbon may alter oxygen conditions within sediment pore spaces, with implications for ecological recovery.

Given these findings, it is important to ensure that amended sediments maintain sufficient oxygen levels to support benthic community reestablishment. Accordingly, in situ measurements of sediment porewater dissolved oxygen should be conducted using appropriate sediment probe instrumentation. Routine monitoring of sediment pore space DO is recommended as part of the RD/RA performance monitoring program (see Neill et al. 2014).

Quality control procedures

Clarification is needed regarding the quality control (QC) procedures associated with material placement in the UDF. Specifically, it should be explained how the results of these treatability studies will inform any modifications to QC criteria. EPA should ensure that any such changes are clearly defined, technically justified, and incorporated into the forthcoming Supplemental Information Package for UDF operations.

Additional aerial maps

Please require that the Final RD/RA Work Plan for Reach 5A include aerial maps depicting the riverbed sediment amendment footprint in relation to the historic PCB occurrence, along with any riverbed erosion information.

Low carbon cement

Could a cement other than carbon intensive portland cement be used? Sublime Systems makes a low-carbon cement that, according to their website, "Sublime Cement® is cleaner, more durable, whiter, and is an industry-accepted replacement for today's portland cement." Sublime's first commercial manufacturing plant in Holyoke, Mass.

Thank you for considering our comments.

Sincerely,

Brittany Ebeling, Executive Director

Jane Winn, Board Member Emeritus

Technical Assistance Services *for* Communities GE-Pittsfield/Housatonic River Site Comments on Treatability Studies Summary Report for Reach 5A 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 Treatability Studies Summary Report for Reach 5A
February 2026

Introduction

This document provides TASC comments on the Treatability Studies Summary Report for Reach 5A 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 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 conducting additional pre-design investigations to support ongoing remedial design evaluations, inform development of the final remedial design and prepare for remedial action in Reach 5A.

The February 2026 Treatability Studies Summary Report for Reach 5A summarizes the results of the pre-design investigations and testing described in the original September 2023 Conceptual Remedial Design/Remedial Action Work Plan for Reach 5A (Appendix H: Treatability Studies Work Plan for Reach 5a), the February 2025 Addendum to Treatability Studies Work Plan for Reach 5A, and the June 2025 Revised Addendum to Treatability Studies Work Plan for Reach 5A. EPA has reviewed and provided both feedback and conditional approvals to the original work plan and addenda.

Results reported in the current report, as well as additional data from ongoing studies, will be used to draft the Final Remedial Design/Remedial Action Work Plan for Reach 5A, anticipated for release later this year.

Summary

The February 2026 Treatability Studies Summary Report for Reach 5A has five sections:

1. Introduction
2. Sediment Dewatering Treatability Testing
3. Backwater Sediment Amendment Jar Testing
4. Chemical Isolation Layer Amendment Testing
5. References

The three treatability study areas discussed in this report have four primary objectives.

1. Evaluate different methods for separating water and solids (dewatering) in sediments to be removed from Reach 5A.
2. Assess what the potential range of polychlorinated biphenyl (PCB) concentrations may be in sediments (as excavated) and in the water resulting from the dewatering of excavated sediment.
3. Evaluate the use of different sediment amendment types, as well as how much of each amendment (dose), to find an optimal treatment option for reducing PCB concentrations in the porewater of backwater sediments.
4. Evaluate specific carbon-based amendment types, and doses, for optimal chemical isolation of PCBs in the engineered caps to be constructed in Reach 5A.

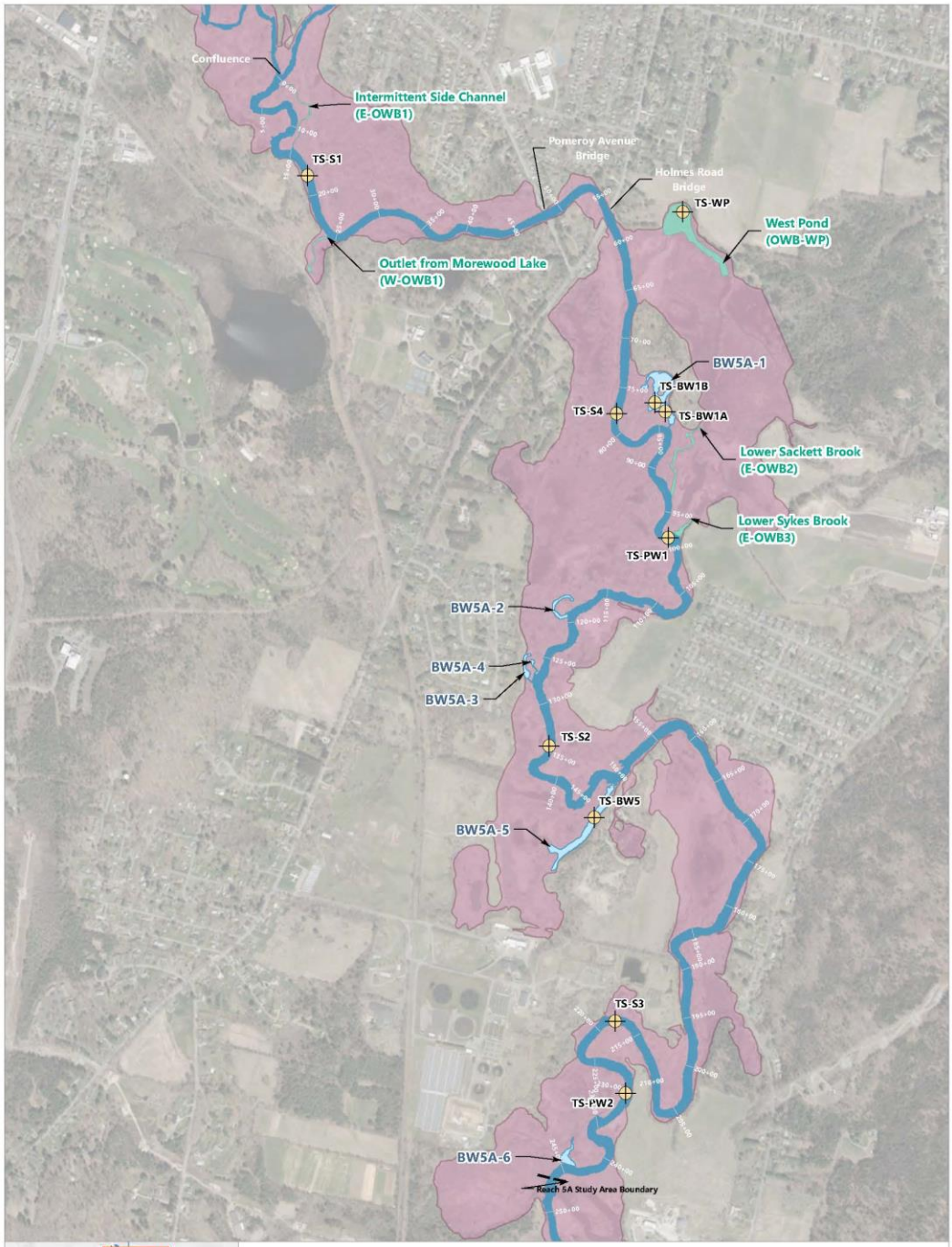
The Sediment Dewatering Treatability Testing section addresses objectives 1 and 2: effective dewatering methods, and identifying reasonable expectations for PCB concentrations in sediment removal work. Sediment and surface water samples gathered from six locations along Reach 5A were tested (Figure 1). Dewatering methods tested included samples of sediment (as removed from the environment) and samples of sediment amended using different concentrations of Type IL Portland Cement placed on filters to monitor drainage via gravity. Both options were also tested using shake or vibration testing with the goal of materials in the sediment separating into layers by particle size (stratification) and separation of excess liquid from solids. For all combinations, the liquid resulting from each sample would still pass through the filter (filtrate). Contaminant concentrations in filtrate will be used to design the treatment system for liquid that is separated and filtered from sediment solids.

The Backwater Sediment Amendment Jar Testing section addresses objective 3: optimal sediment amendment composition and dose to reduce PCB concentrations in backwater sediment porewater. This test was used to simulate native environmental conditions in a laboratory for testing different treatment options. The three carbon-based treatments tested were powdered activated carbon (PAC), granular activated carbon (GAC) and activated biochar, each tested at different doses. The study found that jars amended with 2% and 5% PAC resulted in the greatest reduction of PCB concentrations in porewater at the lowest dose.

The Chemical Isolation Layer Amendment Testing section addresses objective 4: optimal amendment type and dose to isolate PCBs in planned engineered sediment caps. This study is meant to inform the design of sediment caps for Reach 5A and looked specifically at materials to use in the cap layer meant to capture dissolved PCB contamination in the porewater. The amendments tested were PAC and GAC and the report indicates data presented are preliminary as

the study remains underway. Data from this study will be used in a simulation model to determine the final chemical isolation layer thickness, amendment type (i.e., PAC versus GAC) and amendment dose needed to achieve the design target of a 99% reduction of total PCBs in porewater.

Figure 1: Sediment Sample Locations along Reach 5A



TASC Comments

The Treatability Studies Summary Report for Reach 5A (Reach 5A Treatability Studies Summary Report) presents the results from the different studies completed to help support the final remedial design/remedial action (RD/RA) for Reach 5A. Remediation in Reach 5A will include removal and capping of sediments in the riverbed and remediation of associated backwaters, riverbank soils, and floodplain soils (including those at residential properties, non-residential floodplain areas, and vernal pools) to the extent required by the applicable performance standards in the Revised Final Permit.

Soil and sediment excavated from the remediation areas will be subject to disposal at an on-site Upland Disposal Facility (UDF) or at an off-site disposal facility in accordance with the requirements specified in Attachment E to the Revised Final Permit. The work plan for the treatability studies was provided as part (Appendix H) of the Conceptual Remedial Design/Remedial Action Work Plan for Reach 5A ([Conceptual RD/RA for Reach 5A]; Anchor QEA LLC, AECOM and ARCADIS, 2023). TASC was given the opportunity to review the Conceptual RD/RA for Reach 5A and provided comments to the community (TASC, 2023). TASC did not have any comments on the treatability studies work plan portion (Appendix H) of the document.

In general, the Reach 5A Treatability Studies Summary Report fulfills the requirements set forth within the Statement of Work (SOW) and Revised Final Permit. TASC revisited comments provided to the Conceptual RD/RA for Reach 5A and the Vernal Pool Pilot Study Work Plan (Anchor QEA, 2023) because the vernal pool pilot study is founded on similar testing approaches. TASC did not identify any significant concerns regarding the report and formulated comments to help the community better understand the treatability studies results as they relate to the forthcoming Final RD/RA for Reach 5A.

1. The Reach 5A Treatability Studies Summary Report provides a thorough summary of the treatability test methods and results. A considerable amount of time and work has been accomplished toward achieving the start of Reach 5A RD/RA in-field work. As this in-field step approaches, it is a question if any recent RD/RA 'learned lessons' may require additional treatability study assessment.

   Per the initial treatability studies work plan provided in Appendix H of the Conceptual RD/RA for Reach 5A (Anchor QEA LLC, AECOM and ARCADIS, 2023), this report should present a summary of any identified data gaps. As stated in the work plan, "If alternate methods are identified as the primary means for the in-river work during final design or during an adaptive management process, additional treatability testing may be proposed (e.g., dredging elutriate testing or column-settling testing may be conducted if the in-river sediment removal operations are conducted without any hydraulic controls). Also, additional treatability testing may be proposed after a remediation contractor is selected to refine the contractor's proposed implementation methods."

   If the Reach 5A RD/RA process has advanced enough to warrant further treatability study testing, the community may want to ask EPA to describe what (if any) additional studies are to be conducted and what changes to the initial conceptual Reach 5A RD/RA have occurred to warrant these study needs.

2. The Reach 5A Treatability Studies Summary Report provides a thorough summary of the treatability test results but is lacking information that puts these results into context for the community. For instance, the report summarizes the gravity drainage studies, which will determine whether additional treatment is required to meet transportation and disposal facility requirements. The "requirements for transportation and disposal" are not defined in the document and are not summarized in comparison with the study results. As a result, it is difficult for a reader to draw conclusions.

   The community may want to ask EPA if the report should be amended to summarize the conclusions drawn from each of the treatability studies.

3. The initial Treatability Studies Work Plan for Reach 5A produced as part of the Conceptual RD/RA for Reach 5A (Anchor QEA LLC, AECOM and ARCADIS, 2023) provided a table summarizing the proposed bulk sediment samples to be collected for treatability testing (shown below, taken from pdf page 11 of Appendix H of the Conceptual RD/RA for Reach 5A).

Table 3-1
Bulk Sediment Sample Summary

Treatability Sample ID	PDI Sample Location[1]	Grain Size Summary	Estimated PCB Concentration	Sediment Sample Volume	Surface Water Sample Volume
TS-S1	SE-017-96-C	Fine to coarse sand	16 mg/kg	20 gallons	10 gallons
TS-S2	SE-134-45-W	Fine to coarse sand	86 mg/kg	20 gallons	10 gallons
TS-S3	SE-217-93-E	Fine to coarse sand	157 mg/kg	20 gallons	10 gallons
TS-BW1	SE-BW5A-1-E-F-9-10	Silt with sand	43 mg/kg	5 gallons	N/A
TS-BW5	SE-BW5A-5-C-D-9-10	Silt with sand	5 mg/kg	20 gallons	10 gallons
TS-WP	SE-WP-F-G-3-4	Silt with sand	6 mg/kg	20 gallons	10 gallons

Note:
The sediment samples will be collected in the vicinity of the reference PDI sampling location to a depth of one foot below the sediment surface.

Table 2-1 of the Reach 5A Treatability Studies Summary Report provides information gathered from the collected bulk samples, which show differences in the actual PCB concentrations (taken from pdf page 14 of the summary report).

Table 2-1
Sediment Dewatering Treatability Study Bulk Sediment Sample Summary

Sample ID	Collection Location	Depth of Sample	Total PCB Concentration
TS-S1	Main channel	1 foot	19.2 mg/kg
TS-WP	West Pond	1 foot	0.0644 mg/kg
TS-S4	Main channel	2 feet	0.949 mg/kg
TS-S2	Main channel	1 foot	1.08 mg/kg
TS-BW5	Backwater area	1 foot	2.03 mg/kg
TS-S3	Main channel	1 foot	12.0 mg/kg

Notes:
Samples listed north to south.
mg/kg: milligrams per kilogram

EPA and GE acknowledged the differences between the estimated PCB concentrations (Table 3-1) and the actual measured concentrations (Table 2-1); and adjusted PCB concentrations by "spiking" (adding PCBs to increase the concentration) the tested sediments. This is an appropriate approach to accommodate the data gap created by the absence of a bulk sediment with high PCB concentrations. However, it seems that the use of spiked material may present an uncertainty in the results. Spiked materials may be over or under conservative in their production of representative PCB conditions.

The community may want to ask EPA if the use of spiked bulk sample materials introduces a source of uncertainty that is of concern, and if so, what EPA's recommended solution is to address this data gap.

4. The treatability studies summarized in the document are founded on samples collected from previous investigations. While those historic samples were collected to capture and characterize typical Reach 5A conditions, the river setting is a dynamic ecosystem that changes over time. As stated in the document, "the amendment dose" (of carbon-based sorptive amendment) may vary in different portions of Reach 5A depending on the level of PCB contamination. As the remedy is being applied (beginning at the start of the Reach 5A footprint and progressing downriver), it seems prudent to take sediment samples in real time to be sure the applied amendment is suitable for the contamination that is present.

   The community may want to ask EPA if sampling of riverbed sediment will be conducted in real time during RD/RA amendment application to ensure that the amendment remains suitable for the residual contamination that is detected.

5. The forthcoming Final RD/RA Work Plan for Reach 5A will include the results gained from the treatability studies described in the document. It is recommended that this final work plan provide aerial maps showing the chosen amendment doses by river mile and historic PCB concentrations. It would also be useful to see this amendment footprint in relation to erosion measures (if available).

   The community may want to ask EPA if the forthcoming Final RD/RA Work Plan for Reach 5A can include aerial maps depicting the riverbed sediment amendment footprint in relation to the historic PCB occurrence, along with any riverbed erosion information.

6. Time is a variable that was tested as part of the treatability studies. For instance, the drainage study involved placing sediment samples within a screen and allowing the sample to drain by gravity for a period of 72 hours. During this period, samples were collected at multiple time intervals (i.e., 6, 24, 48 and 72 hours) from each sample for testing. Results for various tests indicate that the more time allotted for various steps will yield better results. It is difficult to envision how the actual Reach 5A waste collection, treatment and transport will allow for significant time requirements. It would be useful for the forthcoming Final RD/RA Work Plan for Reach 5A to show a timeline of the waste removal, treatment and disposal process that accommodates the treatability study time requirements.

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   The community may want to ask EPA if dissolved oxygen levels in sediment and water nutrient levels should be components of the monitoring plan.

9. Table 4-1 summarizes water quality parameters for porewater samples. Results of total suspended solids (TSS), total organic carbon (TOC) and dissolved organic carbon (DOC) are shown. TOC is the sum of all organic carbon in a water sample, consisting of both particulate organic carbon (POC) and DOC. DOC, generally defined as carbon passing through a filter, is the soluble portion of TOC and often constitutes 90% or more of the total. The values in Table 4-1 show DOC concentrations greater than TOC, which is contrary to expected results.

   The community may want to ask EPA about the TOC and DOC results provided in Table 4-1 and if there is an explanation for why the DOC values are greater than the TOC values.

References Cited

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

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Anchor QEA (Anchor QEA, LLC), AECOM and ARCADIS. GE-Pittsfield/Housatonic River Site, Rest of River, Conceptual Remedial Design/Remedial Action Work Plan for Reach 5A. September 2023. https://semspub.epa.gov/work/01/677553.pdf

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

Neill, M. et al. 2014. Direct measurement of oxygen in river substrates. Water and Environment Journal 28, 566–571. http://onlinelibrary.wiley.com/doi/10.1111/wej.12072/pdf

Technical Assistance Services for Communities (TASC). Technical Assistance Services for Communities (TASC) Comments on Conceptual Remedial Design/Remedial Action Work Plan for Reach 5A, September 2023. January 18, 2023.

TASC Contact Information

Technical Advisor
Karmen King
970-852-0036
kking@skeo.com

Project Manager/Technical Advisor
Sabrina Foster
434-233-4728
sfoster@skeo.com

Branch Director
Tiffany Reed
847-786-8767
treed@skeo.com

Skeo Co-CEO and Director of Finance and Contracts
Briana Branham
434-226-4284
bbranham@skeo.com

TASC Quality Control Monitor
Bruce Engelbert
703-953-6675
bengelbert@skeo.com