Working Draft

GE-Pittsfield / Housatonic River Site
Rest of River

Overview of Transportation and Disposal Plan Development

June 27, 2023

Agenda

- Site Description and Transportation and Disposal Plan Overview
- Summary of EPA-Estimated Removal Volumes and Schedule
- Modes of Transportation to be Evaluated
- Estimated Truck Trips
- Quality of Life Compliance Plan Overview

Site Description

Rest of River (ROR) includes portions of the Housatonic River and its backwaters and floodplain downstream of the Confluence of the East and West Branches of the Housatonic River, and is identified according to river reach designations.

EPA's remedy includes removal of sediment, erodible banks, and/or floodplain soil from portions of Reaches 5 through 8 (Figure 1), with disposal in either the Upland Disposal Facility or at an out of state facility.

- **Reach 5: From the Confluence to Woods Pond**
  - 5A: Confluence to the Pittsfield Wastewater Treatment Plant
  - 5B: Pittsfield Wastewater Treatment Plant to Roaring Brook
  - 5C: Roaring Brook to Woods Pond
- **Reach 6: Woods Pond**
- **Reach 7: Woods Pond Dam to Rising Pond**, including eight subreaches for the various dam impoundments and river between impoundments
- **Reach 8: Rising Pond**

T&D Plan Overview

- **On December 16, 2020, EPA issued GE a final revised modification of GE's RCRA Corrective Action Permit (Revised Permit) for the ROR**
- **On September 16, 2021, EPA approved GE's Final Revised Statement of Work, describing deliverables and activities to implement ROR Remedial Action**
- **Under the EPA-approved schedule:**
  - The design for the ROR Remedial Action will use a phased approach, with the Reach 5A conceptual design due to EPA in Fall 2023. Designs for subsequent reaches are due later
  - In addition, certain plans will be developed in late 2023, including the Transportation & Disposal Plan (T&D Plan) and the Quality of Life Compliance Plan
- **The T&D Plan will describe the procedures to transport and dispose of material removed during implementation of the ROR Remedial Action including for off-site and disposal in the UDF.**
- **The Fall 2023 T&D Plan will focus mainly on Reaches 5 through 6, and will be updated later to include details related to downstream reaches**

Summary of EPA-Estimated Removal Volumes / Schedule

Reach	Description	Approximate Removal Volume
5A	Removal of sediment, certain erodible riverbanks, floodplain soil	193,000 CY sediment/banks 43,800 CY soil
5B	Removal of sediment from specific areas, certain erodible riverbanks, floodplain soil	1,000 CY sediment/banks 15,000 CY soil
5C	Removal of sediment (hydraulically, if feasible), floodplain soil	279,000 CY sediment 16,000 CY soil
5 Backwaters	Removal of sediment (some hydraulically, if feasible)	95,000 CY sediment
6 (Woods Pond)	Removal of sediment (hydraulically, if feasible), floodplain soil	285,000 CY sediment 600 CY soil
7 (Impoundments)	Removal of sediment, floodplain soil	115,000 CY sediment 3,000 CY soil
8 (Rising Pond)	Removal of sediment	87,000 CY sediment
Total Estimated Soil/Sediment Volume		**1,133,000 CY**

- Volumes shown are based on the total sediment/soil removal volumes presented in Table 2 of EPA's July 2020 Statement of Basis for its proposed ROR remedy, broken down by reach at that time. Volumes are subject to change based on ongoing pre-design sampling and design.
- Removal will start at the upstream boundary, and removal in Reaches 5 and 6 will be completed before removal begins in Reaches 7 and 8.
- Total duration of remediation estimated by EPA to be approximately 13 years, with removal in Reach 7 anticipated to start 10 years after removal starts in Reach 5A.

Modes of Transportation to be Evaluated

- **Off-Site Disposal:**
  - Truck: Truck routes to be selected to minimize impact to residential neighborhoods where feasible and avoid specific areas/roads as identified in the Revised Permit
  - Railroad: Truck to a railroad loading facility
- **On-Site Disposal:**
  - Truck: Truck routes to be selected to minimize impact to residential neighborhoods where feasible and avoid specific areas/roads as identified in the Revised Permit
  - Pipe (hydraulic removal/conveyance, if feasible): Pipe route in/adjacent to river through Reaches 5C and 6 to convey material directly to the UDF area
  - Railroad: Truck to a local railroad loading facility, truck from off-loading facility to UDF
- **See Figures 1 through 5**

Requirements for Use of Rail for On-Site Disposal

- **Construction of new rail spur loading facility(ies) along remedial area**
- **Trucks required to get material from staging areas near the river to the loading facility(ies)**
- **Construction of new rail spur unloading facility near the UDF**
- **Trucks required to get material from unloading facility to UDF**

Subject to further evaluation, it appears rail transport for on-site disposal will likely result in more material handling / truck traffic.

Estimated Truck Trips – Reach 5A

Description	Estimate
Duration of removal	4 years
Estimated average removal volume per year[1]	59,200 cubic yards
Average approximate truck trips per year[2]	5,000 trips
Average approximate truck trips per day[3]	25 trips

1. Based on total EPA-estimated Reach 5A volume of 236,800 cubic yards.
2. Based on 16-ton trucks for on-site transport and 20-ton trucks for off-site transport.
3. Assumes 198 days per year, based on an assumed average of 22 working days per month and a 9-month construction season.
4. Volume and duration subject to change based on sampling and design, which will change estimated number of truck trips.

Estimated Truck Trips – Reach 5B

Description	Estimate
Duration of removal	1 year
Estimated average removal volume per year[1]	16,000 cubic yards
Average approximate truck trips per year[2]	1,350 trips
Average approximate truck trips per day[3]	7 trips

1. Based on total EPA-estimated Reach 5B volume of 16,000 cubic yards.
2. Based on 16-ton trucks for on-site transport and 20-ton trucks for off-site transport.
3. Assumes 198 days per year, based on an assumed average of 22 working days per month and a 9-month construction season.
4. Volume and duration subject to change based on sampling and design, which will change estimated number of truck trips.

Estimated Truck Trips – Reach 5C

Description	Estimate
Duration of removal	3 year
Estimated average soil removal volume per year[1]	5,300 cubic yards
Average approximate truck trips per year[2]	500 trips
Average approximate truck trips per day[3]	3 trips

1. Based on total EPA-estimated Reach 5C floodplain soil volume of 16,000 cubic yards.
2. Based on 16-ton trucks for on-site transport and 20-ton trucks for off-site transport.
3. Assumes 198 days per year, based on an assumed average of 22 working days per month and a 9-month construction season.
4. As indicated in the Revised Permit, sediment from Reach 5C (279,000 cubic yards) will be transported hydraulically, if feasible, directly to the UDF. This eliminates an approximate average of 8,000 truck trips per year (40 per day average) for on-site transport. A relatively small percentage of the sediment may go off-site for disposal, requiring some truck trips.
5. Volume and duration subject to change based on sampling and design, which will change estimated number of truck trips.

Estimated Truck Trips – Reach 6

Description	Estimate
Duration of removal	3 year
Estimated average soil removal volume per year[1]	200 cubic yards
Average approximate truck trips per year[2]	20 trips
Average approximate truck trips per day[3]	0 to 1 trips

1. Based on total EPA-estimated Reach 6 floodplain soil volume of 600 cubic yards
2. Based on 16-ton trucks for on-site transport and 20-ton trucks for off-site transport.
3. Assumes 198 days per year, based on an assumed average of 22 working days per month and a 9-month construction season.
4. As indicated in the Revised Permit, sediment from Reach 6 (285,000 cubic yards) will be transported hydraulically, if feasible, directly to the UDF. This eliminates an approximate average of 8,000 truck trips per year (40 per day average) for on-site transport. A relatively small percentage of the sediment may go off-site for disposal, requiring some truck trips.
5. Volume and duration subject to change based on sampling and design, which will change estimated number of truck trips.

Estimated Truck Trips – Reaches 7 & 8

Description	Estimate
Duration of removal	3 years
Estimated average removal volume per year[1]	68,300 cubic yards
Average approximate truck trips per year[2]	6,000 trips
Average approximate truck trips per day[3]	30 trips

1. Based on total EPA-estimated volume of 205,000 cubic yards for Reaches 7 and 8. Subject to change based on sampling and design, which will change estimated number of truck trips.
2. Based on 16-ton trucks for on-site transport and 20-ton trucks for off-site transport.
3. Assumes 198 days per year, based on an assumed average of 22 working days per month and a 9-month construction season.

Quality of Life Compliance Plan Overview

- **The Quality of Life Compliance (QoL) Plan will discuss how the following will be addressed during remediation:**
  - Air quality, noise, odor, and light impacts and associated proposed standards, methods for monitoring and compliance, contingency actions, and how any complaints will be addressed
  - Impacts on river and floodplain recreational activities
  - Road use, including methods to mitigate traffic impacts, and monitoring of road conditions *(overlaps with the T&D Plan)*
  - Community health and safety
- **The QoL Plan is scheduled for submittal to EPA in December 2023**