

Public Input on General Electric's
Revised OnSite and OffSite Transportation and
Disposal Plan dated October 15, 2024

October 2024 January 2025

Public Input ended on January 15, 2025

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, OMAHA DISTRICT
1616 CAPITOL AVENUE
OMAHA, NE 68102-4901

CENWO-EDT-ES

14 January 2025

MEMORANDUM FOR Chief, Operations Branch, USEPA Region 1

SUBJECT: General Electric Housatonic River Revised On-Site and Off-Site Transportation and Disposal Plan

1. Reference. General Electric (GE) Housatonic River, Rest of River in Pittsfield, Massachusetts, Revised On-Site and Off-Site Transportation and Disposal Plan for the dated October 2024.
2. Review of On-Site and Off-Site Transportation and Disposal Plan by United States Army Corps of Engineers (USACE) Transportation Systems Center (TSC). The TSC agrees with technical rail assessments and conclusions. Some minor subjective assessments are not agreed with; however, the difference of opinion on the subjective assessments do not alter the overall assessment or conclusions.
3. The TSC reviewed the plan for an assessment of GE's technical design, assumptions, conclusions, and application of railroad infrastructure in support of the proposed project efforts and was not directly asked whether rail is appropriate or recommended for this site.
4. The TSC agrees with the design analysis for railcar capacity, viability for railhead sites, design limitations, and transportation processes. For the analysis to develop a rail facility at the UDF location, the TSC agrees with the assessment that the location is not practicably feasible. The Department of Defense does not construct track with a horizontal curve greater than ten-degrees on main running tracks.
5. The Upland Disposal Facility location would require significant infrastructure construction, relocation of utilities, and additional rail crossings. The introduction of additional rail crossings adds public safety concerns on top of the technical challenges.
6. Rail transportation is most efficient when there is a point-to-point transportation need. This application of rail transportation involves a distributed collection and multiple sites for onload and offload. This is not a typical application for rail transportation because of increased effort to develop multiple sites, operate at multiple locations, and the extra handling of material. It would be more typical for transportation of off-site disposal of material if the final disposal was a significant distance away and the removal was at a single source.
7. A detailed review for logistical or economic considerations for implementation was not conducted. The TSC has similar concerns that were noted in the report about

CENWO-EDT-ES

SUBJECT: General Electric Housatonic River Revised On-Site and Off-Site
Transportation and Disposal Plan

availability and reliability of the local operator to meet production demands. However, the TSC does not have the expertise on thruput and local rail service provider information to properly evaluate it.

8. The TSC recommends seeking out information from the local operator for a capabilities assessment, information regarding size and number of locomotives, production rate ability, and any competing customer needs.

9. The TSC recommends having alternative modes of transportation available if rail service is not able to maintain reasonable and competitive production relative to alternative transportation methods.

10. For execution, this application of rail transportation requires a significant up front capital investment. The TSC recommends obtaining contractual rates and commitments from the servicing railroad prior to proceeding with a rail transportation alternative.

11. Based on the information provided in the report, the TSC has full confidence in the rail design analysis completed as part of this report. The point of contact is Joshua Boeckmann, P.E., Senior Expert - Railroads, at (314) 795-4513 if you have any questions.

ANDREW P. FANCIULLO
Chief, USACE Engineering Systems
Section

CF:
Project Manager (Marie Esten)
USACE New England District



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

Bonnie Heiple
Commissioner

January 13, 2025

Via electronic submittal to:

R1Housatonic@epa.gov

Mr. Dean Tagliaferro
EPA Project Coordinator
U.S. Environmental Protection Agency
c/o HDR, Inc.
75 South Church Street, Suite 403
Pittsfield, MA 01201

Re: Comments on *Revised On-Site and Off-Site Transportation and Disposal Plan for the Rest of River, October 15, 2024*, prepared for General Electric Company by Arcadis – GE/Housatonic River Site

Dear Mr. Tagliaferro:

In October 2023, The Massachusetts Department of Environmental Protection (Department or MassDEP) received the *On-Site and Off-Site Transportation and Disposal Plan for the Rest of River* (T&D Plan), prepared for General Electric Company (GE) by Arcadis in accordance with the requirement specified in Section 4.3.1.1 of the *Final Revised Statement of Work, September 14, 2021*, prepared by Anchor QEA for GE and approved by U.S. EPA. MassDEP reviewed the T&D Plan and, on January 31, 2024, submitted comments to U.S. EPA. As outlined in our comment submittal letter, the T&D Plan required additional details to evaluate the benefits of rail vs. truck transportation of site contaminants to the Upland Disposal Facility (UDF) or off-site, out-of-state locations.

On October 15, 2024, MassDEP received the *Revised On-Site and Off-Site Transportation and Disposal Plan for the Rest of River* (Revised T&D Plan), prepared for GE by Arcadis.

This information is available in alternate format. Please contact MassDEP at 617-292-5500.

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MassDEP has reviewed the Revised T&D Plan and requests additional clarification as reflected in the following comments.

1. In Section 1.1, the Department notes a typographical error. 310 CMR 16.00 references the Massachusetts solid waste and hazardous waste facility siting and location regulations.
2. In Section 6.1, best management practices (BMPs) relative to transportation requirements applicable to on-site and off-site truck and rail/truck transport are summarized. One listed BMP states: “*Have detailed provisions for responding to transportation emergencies such as accidents, spills, releases, or other incidents*”. Please include the detailed provisions for transportation emergencies or specify in what document the provisions will be provided.
3. Section 6.3.3 states “*the amount of material transported on-site to the UDF for disposal will be documented through the estimated volume of material in each truck unloading at the UDF.*”
A more accurate volume assessment method/tools should be implemented for all transportation and disposal methods to ensure compliance with the volume limits established in the Settlement Agreement and the 2020 Revised Final Permit Modification to the 2016 Reissued RCRA Permit.
4. Section 7.1 presents the required coordination and receipt of transported materials at the UDF. This section states, “*It is currently anticipated that material delivered to the UDF by hydraulic transport will be routed to cell areas within the UDF Consolidation Area for dewatering operations (e.g., areas with geotextile filter bags where the material will undergo dewatering and consolidation or other appropriate methods).*” The Revised T&D Plan does not define, locate, or provide additional details regarding the dewatering operations.
Please include details of proposed dewatering operations at the UDF or specify in what document the details will be provided.
5. Section 7.2 presents the on-site transportation of generated liquids. It is our understanding that Reach 5A removal action will begin before any water treatment system is completed. The Revised T&D Plan proposes to truck any leachate generated during this time to Pittsfield for treatment. It is estimated that 2 truck trips per day to Pittsfield will be necessary. Once the treatment facilities are operational, the only time that trucking of leachate would be necessary is in cases of a treatment facility shut down for maintenance or repair. If that occurred, it would only be 2 trucks per day – as estimated previously. However, once hydraulic dredging begins in Reach 6, the

dewatering activities may generate 100,000 – 200,000 gallons per day of water that will need treatment. Where will this water be treated? The Revised T&D Plan does not explicitly state that the treatment facility will be operational in time for the start of hydraulic dredging in Reach 6. Please clarify if the treatment facility will be in operation prior to the start of hydraulic dredging.

Additionally, please provide a backup plan for the water resulting from dewatering activities for Reach 6 in the event that the treatment facility needs to undergo maintenance, repair, or shut down.

Thank you for the opportunity to comment on this document. Please contact Ben Guidi (benjamin.guidi@mass.gov) or Jason Perry (jason.m.perry@mass.gov) if you have any questions or need clarification on these comments.

Sincerely,

/s/ Tamara Cardona-Marek

Tamara Cardona-Marek, PhD
Deputy Regional Director, MassDEP
Bureau of Waste Site Cleanup

cc: Benjamin Guidi, MassDEP WERO
Jason Perry, MassDEP WERO



重要 महत्वपूर्ण σημαντικός
Important
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Communication for Non-English-Speaking Parties

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简体中文 Chinese Simplified

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Dokiman sa-a se yon bagay enpòtan epi yo ta dwe tradwi l imedyatman. Si ou bezwen dokimar sa a tradwi, tanpri kontakte Direktè Divèsite MassDEP la nan nimewo telefòn endike anba.

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Tài liệu này rất quan trọng và cần được dịch ngay lập tức. Nếu quý vị cần dịch tài liệu này, xin liên lạc với Giám đốc Đa dạng của MassDEP theo các số điện thoại ghi dưới đây.

ប្រទេសកម្ពុជា Khmer/Cambodian

ឯកសារនេះគឺសំខាន់ហើយគួរត្រូវបានបកប្រែភ្លាមៗ។ ប្រសិនបើអ្នកត្រូវការឱ្យគេបកប្រែឯកសារនេះ:

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Kriolu Kabuverdianu Cape Verdean

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Contact Glynis L. Bugg, Acting Diversity Director/Civil Rights 857-262-0606
Massachusetts Department of Environmental Protection
100 Cambridge Street 9th Floor Boston, MA 02114

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Русский Russian

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هذه الوثيقة مهمة ويجب ترجمتها على الفور. إذا كنت بحاجة إلى هذه الوثيقة مترجمة، يرجى الاتصال بمدير التنوع (MassDEP ٨٥٧٢٦٢٠٦٠٦) على أرقام الهواتف المدرجة أدناه.

한국어 Korean

이 문서는 중요하고 즉시 번역해야 합니다. 이 문서의 번역이 필요하시다면, 아래의 전화 번호로 MassDEP의 다양성 담당 이사에 문의하시기 바랍니다.

հայերէն Armenian

Այս փաստաթուղթը կարևոր է և պետք է անմիջապես թարգմանվի: Եթե Ձեզ անհրաժեշտ է այս փաստաթուղթը թարգմանել, դիմեք MassDEP-ի բազմազանության տնօրենին ստորև նշված հեռախոսահամարով:

فارسی Farsi Persian

این نامه و مدارکی که بدست شما رسیده خیلی مهم و قانونی است. اگر شما احتیاج دارید که این نامه و مدارک به زبان فارسی ترجمه بشود لطفت خیلی زود به ماساچوست سازمان محیط زیست (MassDEP) در شماره تلفن ٨٥٧٢٦٢٠٦٠٦ تماس بگیرید.

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Ελληνική Greek

Το παρόν έγγραφο είναι σημαντικό και θα πρέπει να μεταφραστεί αμέσως. Αν χρειάζεστε μετάφραση του παρόντος εγγράφου, παρακαλούμε επικοινωνήστε με τον Διευθυντή Διαφορετικότητας του MassDEP στους αριθμούς τηλεφώνου που αναγράφονται παρακάτω.

Italiano Italian

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हिन्दी Hindi

यह दस्तावेज़ महत्वपूर्ण है और इसका तुरंत अनुवाद किया जाना चाहिए. यदि आपको इस दस्तावेज़ का अनुवाद करने की आवश्यकता है, तो कृपया नीचे सूचीबद्ध टेलीफोन नंबरों पर मासडेप्स डाइवर्सिटी के निदेशक से संपर्क करें.

Contact **Glynis L. Bugg, Acting Diversity Director/Civil Rights 857-262-0606**

**Massachusetts Department of Environmental Protection
100 Cambridge Street 9th Floor Boston, MA 02114**

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Mr. Dean Tagliaferro
EPA Project Coordinator
U.S. Environmental Protection Agency
c/o HDR, Inc.
75 South Church Street, Suite 403
Pittsfield, MA 01201



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DIVISION OF FISHERIES & WILDLIFE

1 Rabbit Hill Road, Westborough, MA 01581

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January 15, 2025

Dean Tagliaferro
EPA New England, Region I
5 Post Office Square
Boston, MA 02109-3912

Submitted via email: Tagliaferro.Dean@epa.gov and R1Housatonic@epa.gov

Re: GE-Pittsfield/Housatonic River Site
Rest of River (GECD850)
On-Site and Off-Site Transportation and Disposal Plan

To Whom it May Concern:

The Massachusetts Division of Fisheries and Wildlife (the Division) is responsible for the conservation of freshwater fish and wildlife in the Commonwealth, including but not limited to plants and animals state-listed as endangered, threatened, or of special concern pursuant to the Massachusetts Endangered Species Act (MESA; MGL c. 131A) and its implementing regulations (321 CMR 10.00). 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 (WPA; 310 CMR 10.00). 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.

In order 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 these Wildlife Management Areas (WMAs), including for hunting, fishing, and trapping.

The Division has received and reviewed the On-Site and Off-Site Transportation and Disposal Plan (TDP) 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. The Division also notes that MESA has been identified as an Applicable and Relevant or Appropriate Requirement (ARAR) by the EPA with respect to Rest of River (ROR) Remediation.

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Massachusetts Endangered Species Act (MESA)

The project area contains suitable habitat for a variety of state-listed species, including grasses, sedges, dragonflies, fishes, freshwater mussels, and herptiles, and the proposed alternative has the potential to adversely impact dozens of state-listed species and their habitats. To fully understand the proposed alternative and evaluate the full scope of potential ecological impacts, we request the following additional information.

1. *A comprehensive analysis of alternatives, including their potential impacts on state-listed species and their habitats.*

The analysis should provide the rationale for evaluating the four alternatives discussed in the plan as well as reasons for exclusion of any other alternatives that were considered. Ultimately, the analysis should describe all alternatives that meet project needs and avoid or minimize short- and long-term impacts to state-listed species and their habitats. At a minimum, for each alternative GE should provide the site name, location, acreage, whether in or outside of Priority Habitat or a designated Core Habitat (see Division letter dated July 31, 2012), an overview of habitats and listed species on and in the immediate vicinity of the site, and the reason(s) for proposing or eliminating the alternative.

2. *Additional specifics regarding all plan components.*

GE should provide additional information regarding the location, timing, and duration of use, and associated site preparation activities for all components of the proposed alternative, including but not limited to staging areas, access roads, access routes, pipes, and slurry disposal. This information is necessary for the Division to fully evaluate potential impacts. For instance, the level of impact from the use of a temporary dam in reach 5A will depend on the duration of raised water levels. Likewise, removal of debris from the forest floor or along riverbanks can change the microtopography of the land so that areas become unsuitable for some species.

3. *Evaluate direct, indirect, short-, and long-term ecological impacts of the proposed alternative.*

GE has not provided an evaluation of impacts to state-listed species associated with the proposed alternative, but the Division anticipates that it will have direct and indirect impacts to state-listed species and their habitats. Direct impacts include but are not limited to direct mortality, habitat loss, and disruption of key behaviors (e.g., nesting, foraging). Immobile species, species located within and along streambanks, and herptiles with limited home ranges are especially vulnerable. Indirect impacts can result from the introduction of invasive plants, the compaction of soils, or the spread of contaminated sediments downstream, to cite a few examples. The duration of impacts will depend on the duration of use and subsequent restoration of habitats to pre-project conditions, but also on the life history, longevity, mobility, and listing status of the species impacted.

The Division requests that GE evaluate direct, indirect, short-, and long-term impacts of all aspects of the project on state-listed species and their habitats, including but not limited to transport of sediments to staging area, use of staging area, disposal and containment of slurry, building and use of access roads (for trucks), access routes (for dredging machinery), and any other components of the plan. The climate

resiliency of the proposed plan should be included in this evaluation to help fully evaluate long-term impacts associated with likely changes in hydrology. GE is strongly encouraged to proactively consult with the Division to help streamline this evaluation. Pre-construction baseline surveys will be particularly important to evaluate impacts and determine reference conditions for future restoration. We also note that the following, additional information will be necessary to fully evaluate impacts and future avoidance, minimization, and mitigation measures.

- a) A habitat assessment for state-listed species. GE must consult with the Division to confirm which species require habitat assessments, which will at a minimum include Jefferson Salamander, Wood Turtle, and several state-listed plants. A qualified biologist or biologists with extensive field experience working with the subject species must perform the assessment.
- b) Pre- (and potentially post-) construction surveys and monitoring for one or more state-listed species, depending on the results of the habitat and impact assessment(s). Surveys will be used to refine potential impacts; design appropriate measures to avoid and minimize impacts; and, if necessary, develop a plan to mitigate for impacts that cannot be avoided. Please note that surveys for state-listed species need to be conducted by a qualified biologist during a specific time or times of year, pursuant to a protocol reviewed and approved in advance by the Division.

Once the proponent has fully evaluated impacts to state-listed species and their habitats, including but not limited to performing necessary habitat assessments and or surveys, GE should consult with the Division to develop plans to avoid and minimize impacts to state-listed species and their habitats. Potential avoidance and minimization measures may include but not be limited to (a) evaluating alternative project footprint configuration/extent to minimize loss of important habitats; (b) implementing Division-approved species protection plans (e.g., time-of-year restrictions, exclusion measures, surveys, and ongoing monitoring, etc.); and (c) implementing Division-approved, long-term adaptive restoration and monitoring plans to ensure that all habitats temporarily impacted by the project are restored to suitable, high-quality habitats. Finally, once GE has sufficiently evaluated alternatives to avoid and minimize impacts, it should consult with the Division to develop a long-term net-benefit plan to mitigate for any impacts that cannot be avoided. Mitigation may include, but may not be limited to, permanent protection of suitable habitat, habitat enhancement, conservation research, and/or conservation funding.

George Darey Housatonic Valley Wildlife Management Area

The implementation of the TDP as submitted would have negative impacts on the George Darey Housatonic Valley WMA (Darey WMA). Specifically, the Division identifies the following concerns.

The TDP does not sufficiently describe the type and placement of the infrastructure needed to transport materials to the UDF or dewatering locations. It seems certain that pipes or other conveyances will pass through and over portions of the Darey WMA, but they are not clearly identified in the plan. That infrastructure would require clearing, soil disturbance, and disruption of public access, the details of

which cannot be determined from the information provided. The Division asks that GE provide locations of hydraulic transport infrastructure, including the work needed for installation and duration.

Hunters, anglers, and other users visit and recreate on portions of the Darey WMA throughout the year. The TDP fails to describe the impact of transportation and disposal on recreational users, or any analysis used to determine that loss of access. For example, increased truck travel along Roaring Brook/Woodland Road will limit access to the eastern side of the Darey WMA where roadside parking is common. The Division asks that GE incorporate loss of recreational access into the alternatives analysis.

Perhaps the most significant impacts from the TDP to the Darey WMA will occur in the section north of Utility Drive in Pittsfield. The construction roads (Figure 4.3) and the proposed rail siding, loading, and staging areas (Figure 4-6) will substantially alter the purpose and function of the Darey WMA. In this portion of the Darey WMA, the upland habitats are managed as open field adjacent to shrublands and wetlands, which combines to produce habitat complexity important to a variety of wildlife species, including nesting birds. The grasslands are managed under a contractual agreement (valid through 2028) with a local farmer who maintains the fields. Both the access roads and the proposed siding will convert or fragment the fields, greatly reducing their function as viable habitat. The full impact of the siding cannot be evaluated because the footprint and details of construction are not adequately described.

Utility Drive is the primary public access point for more than 170 acres of the Darey WMA. The rail siding construction, truck traffic, and prolonged use as a loading site will essentially eliminate public access for an extended duration. The TDP makes no accommodations for this loss of use. The Division asks that GE describe how public access would be managed at this site and how the loss of access will be mitigated.

The Division understands that alteration and disturbance to the Darey WMA are inevitable in the remediation process. However, the long-term use of the area north of Utility Drive is a conversion of the land away from the purposes for which it was conserved, namely wildlife habitat and public recreation. The Division was not consulted regarding the proposed siding. The analysis of alternative sites is insufficient for us to compare the valuation of loss in habitat and public use versus other potential siding locations. We ask that GE describe the evaluation and analysis of alternative sites that may have lesser impact to public resources.

The George Darey Housatonic Valley Wildlife Management Area is conserved for wildlife habitat and public recreation. These purposes are protected by Article 97 of the Amendments to the Massachusetts Constitution ("Article 97"). Article 97 provides, among other things:

. . . the protection of the people in their right to the conservation, development and utilization of the agricultural, mineral, forest, water, air, and other natural resources is hereby declared to be a public purpose. . . .

[I]ands and easements taken or acquired for such purposes shall not be used for other purposes or otherwise disposed of except by laws enacted by a two thirds vote, taken by yeas and nays, of each branch of the general court.

The Division has a longstanding commitment to ensure Article 97 compliance in keeping with its substantial investments in conserving its land and natural resources, as noted above.

Most recently, An Act Preserving Open Space in the Commonwealth (Open Space Act), codified at MGL c. 3, § 5A, established requirements and a process for submission to the legislature of petitions to authorize the use for another purpose or disposition of Article 97 land. The proponent of the change in use or disposition must submit to the Executive Office of Energy and Environmental Affairs alternative analyses and proposed replacement land, or payment of money in lieu of providing replacement land.

In addition, a review through the federal Office of Conservation Investment will be required to ensure compliance and consistency with the federal Wildlife and Sport Fish Restoration Acts, which provide funds to fish and wildlife agencies of the states to restore, conserve, manage, and enhance fish and wildlife resources, including public use of and access to WMAs.

The Division will continue to review and comment on plans and documents prepared by GE associated with the ROR to assist the EPA in ensuring that impacts to state-listed species, vernal pools, and other habitats are monitored and minimized to the greatest extent practical; facilitate restoration of impacted habitats after work is completed; ensure adequate mitigation for impacts that cannot be avoided; and ensure compliance with Article 97, the Open Space Act, and the federal Wildlife and Sport Fish Restoration Acts. The Division also expects to work with the EPA and GE to ensure that unavoidable impacts to state-listed species and their habitats are adequately mitigated consistent with the status of the MESA as an ARAR.

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

Sincerely,

A handwritten signature in blue ink that reads "Mark S. Tisa". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Mark S. Tisa, Ph.D., M.B.A.

Director

Cc: Massachusetts Department of Environmental Protection, Western Region



CITY OF PITTSFIELD

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

MEMORANDUM

To: Dean Tagliaferro, EPA Project Manager Housatonic Site
Chris Smith, EPA
From: James McGrath, Park, Open Space, and Natural Resource Program Manager
Date: January 14, 2025
Subject: Comments on *Revised On-Site and Off-Site Transportation and Disposal Plan*

The City of Pittsfield appreciates the opportunity to provide additional comments on the revised transportation and disposal plan being considered as part of the Rest of River clean up. Overall, the City is pleased that the revised plan considers the use of hydraulic dredging and rail transport in a much more robust way. Our comments below pertain to clean up activities centered in Reach 5A.

We offer the following comments on the revised plan:

The City recommends a reconsideration of the current plan which trucks materials from the east side of the river (East New Lenox Rd.) and back to the Utility Drive siding on the west side of the river via New Lenox and Holmes Rd. It would seem more prudent to consider trucking these materials down Roaring Brook Road to the UDF area, thereby eliminating truck travel miles and all of the associated impacts. Alternatively, spanning the river could be considered.

The City continues to be in support of the decision to classify certain local roads in three Pittsfield neighborhoods as 'restricted use'.

The City continues to maintain that any use of Chapman Street be eliminated from any possible consideration as the intersection Chapman and Holmes has been identified as needing improvement.

The City remains committed to negotiating access agreements through the WWTP on Utility Drive for a rail siding on state land for the transport of materials to the UDF or other disposal locations.

The proposed rail siding near the WWTP is a new feature of this revised plan. It would seem appropriate for the Natural Resource Trustees to review this new design component to determine if there is a need for any mitigation of impacts on the state conservation land to species of interest from this activity.

It is strongly recommended that a communications network be implemented to connect community first responders to ongoing remedial action activities to better prepare for any potential emergency situations. This network should include first responders from Pittsfield Fire and Police Departments as well as representatives from Berkshire Health Systems. The amended transportation changes encompassed by the revised plan introduce the use of the railroad (serviced by the Housatonic Railroad Company, Inc.). It would be prudent to include representatives from the railroad as part of this safety network.

The City calls out the following statement from the 2020 *Settlement Agreement – Housatonic River, Rest of River*, Page 20 as it relates to pre-remediation road infrastructure assessment and cataloging:

GE shall document the pre-existing condition of any municipal road to be used during remediation using 360-degree road imaging technology plus 3D road surface imaging technology. GE shall also photographically document the condition of other visible infrastructure associated with such roads, including bridges culverts and other exposed infrastructure that is not captured by the road scanning process and provide that documentation for review by the affected municipality. GE and the affected municipalities will meet and confer in good faith, and in consultation with experts, regarding the need for the use of Ground Penetrating Radar (“GPR”) technology to assess subsurface conditions in particular areas where such GPR assessment may be warranted. The required Quality of Life Compliance Plan will include documentation showing how GE will repair any damage to the roads, other than normal wear and tear, caused by GE in order to allow safe public access during remediation activities. At the completion of any remediation activities affecting a specific road, GE will document the then-existing condition of the road and associated exposed infrastructure using the same technology as set forth above and provide that documentation for review by the municipality; at that time, GE and the affected municipalities will meet and confer in good faith, and in consultation with experts, regarding the need for the use of GPR technology to assess subsurface conditions in particular areas where such GPR assessment may be warranted. GE shall repair or replace any damage caused by GE.

The City would also like to remind project designers of the following statement from the 2020 *Settlement Agreement – Housatonic River, Rest of River*, Page 7, as it relates to opportunities for permanent recreational enhancements on construction access roads used during the remediation activities:

GE shall work cooperatively with the City of Pittsfield, the Towns of Great Barrington, Lee, Lenox and Stockbridge, and the State of Massachusetts to facilitate their enhancement of recreational activities, such as canoeing and other water activities, hiking, and bike trails in the Rest of River corridor. Such opportunities are possible on properties where remediation will occur and/or where temporary access roads are constructed.

We appreciate the opportunity to provide comments on the revised transportation and disposal plan as it relates to work in Reach 5A. We look forward to further collaboration on evaluation of routes and development of mitigation strategies that would lessen the possibility of negative impacts to our proximate neighborhoods.

Sincerely,

A handwritten signature in black ink, appearing to read "J. McGrath". The signature is fluid and cursive, with the first letter "J" being particularly large and stylized.

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

Christopher Rembold, AICP
Assistant Town Manager / Director of
Planning and Community Development

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TOWN OF GREAT BARRINGTON MASSACHUSETTS

OFFICE OF PLANNING AND COMMUNITY DEVELOPMENT

January 8, 2025

Comments emailed to: RIHousatonic@epa.gov

**Re: GE-Pittsfield/Housatonic River Site:
Revised Transportation and Disposal Plan, December 2024**

Dear EPA:

On behalf of the Town of Great Barrington I respectfully submit the following comments regarding the December 2024 revised Transportation and Disposal Plan (Revised T&D Plan).

This plan is substantially different than the original October 2023 T&D Plan, and we are pleased to see that rail transport has been studied more thoroughly and given more consideration than in the original T&D plan. We appreciate that the latest plan relies on hydraulic dredging and piping from Reach 7G to transport wastes to the Rising Pond siding, rather than on trucking wastes from Reach 7G to Rising Pond through Housatonic Village. As a result, this Revised T&D Plan projects far fewer truck trips per day through Housatonic Village. Hydraulic dredging is not a panacea, but is a step in the right direction.

Given the importance of hydraulic dredging, we are requesting a more thorough description of the hydraulic transportation process and its potential impacts, and more information about the dewatering process, particularly because there will have to be a dewatering facility at Rising Pond. This information should be provided, at the latest, in the Final Remedial Design/Remedial Action Work Plans for the Reach 7G and Reach 8 (Rising Pond) areas. The description should include information about how the slurry, the pipeline in the river, the pumps, and the operations will be designed, constructed, and managed in order to contain the waste and minimize spills, noise, and recreational impacts to the river and surrounding residential areas.

The Revised T&D Plan notes that due to unknown sediment sizes and compositions, the feasibility of hydraulic dredging and hydraulic transport cannot fully be known at this stage. Likewise there also may be infrastructure issues that could impact the feasibility of rail transport from Rising Pond area, but the Revised T&D Plan does not appear to acknowledge that. For example, can the railroad bridges and underpasses between Rising Pond and the UDF hold heavily burdened gondola railroad cars, and can double-stacked intermodal railroad cars fit under the road underpasses?

We hope and expect future plans will have more detail on these matters, and, if the assumptions or strategies in this Revised T&D Plan change, the Town and all parties will be informed.

To that end, we reiterate the following two comments from our January 2024 letter and hope they will be addressed as plans move forward:

We encourage EPA to require GE to develop an ROR communications network so that community safety, emergency response, and public works personnel can be linked into the communications network in order to be aware of patterns of traffic, and other possible concerns (spills, etc.) in order to be better prepared for any potential emergency. The communities can then also provide information to GE with regard to local conditions including safety concerns, road work, closures, etc.

We encourage EPA to require that GE's Adaptive Management Plan include provisions for managing the transportation and disposal options as conditions over the decades-long cleanup evolve. Some changes may be more driven by more mundane occurrences: should a bridge or road fail and an alternate transportation route be needed, how will GE address that? Other changes may be driven by technology: if electric trucks or electric rail become viable, will GE be ready to embrace these technologies which could reduce vehicle emissions even more?

Thank you for the opportunity to comment on the proposed Revised T&D Plan and for continuing to provide Technical Assistance Services for Communities (TASC) to the Rest of River municipalities.

Sincerely,



Christopher Rembold
Interim Town Manager
Assistant Town Manager / Director of Planning & Community Development



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

R. Christopher Brittain,
Town Administrator

January 15, 2025

Mr. Dean Tagliaferro
EPA New England
10 Lyman Street, Suite 2
Pittsfield, MA 01201

Dear Mr. Tagliaferro:

In submitting the comments below, we remind the Environmental Protection Agency, General Electric Corporation, and state and federal courts that the Town of Lee is extremely dissatisfied with the proposed “remedy” for restoration of the Housatonic River. While EPA embraces “risk assessment” to justify moving forward with this plan, it is, in fact, no remedy at all. No PCBs are being neutralized or destroyed. The PCBs are simply to be redistributed or buried. They remain a danger to the health and safety of the residents of the river corridor, the environment, and future generations. Reduction of risk is really reduction of cost to GE, penalizing this and future generations for GE’s reckless policies over decades. The use of the terms “environmental” and “economic justice” ring hollow and will haunt all of us for years to come.

Following please find comments from the Town of Lee regarding GE’s Revised On-Site and Off-Site Transportation and Disposal (T&D) Plan.

1. The Revised T&D Plan proposes four scenarios, each described in detail, in which approximately 22% of the anticipated waste volume for all reaches is transported to the Upland Disposal Facility (UDF) or off site by truck or a combination of truck and rail. The remaining 78% of waste is to be transported to the UDF either hydraulically (74%) or by truck (4%). GE recommends that Scenario 4 be adopted.

The Town of Lee requests that, for clarity, the Revised T&D Plan include a table for Scenario 4 showing the planned disposal of sediment, floodplain soil, and riverbank soil by disposal destination (on site or off site), transportation means (hydraulic, truck/rail, or truck only), and volume (cy).

2. The Revised T&D Plan proposes that 74% of waste be transported hydraulically to the UDF but does not offer significant detail. Since increased reliance on hydraulic transportation is a new feature of the revised plan, it is important that GE provide more information about the methods to be applied and their anticipated impacts. In particular, it is critical to understand how the hydraulic

transportation will be designed, managed, and maintained to contain the waste and minimize opportunities for spills.

The Town of Lee requests that the Revised T&D Plan and other forthcoming documents (such as remediation unit [RU]-specific plans) provide more thorough, detailed analysis of the hydraulic transportation process and its potential impacts.

3. Section 5.1 of the of the Revised T&D Plan states that 785,600 cy of sediments will be conveyed by hydraulic transport from Reaches 5C, 6, 7B, and 7C directly to the UDF. As hydraulic transport removes sediment as a slurry, and soil slurry may be assumed to be 85–90% water by weight, the implication is that approximately 2.68 trillion gallons of water will be drawn from the Housatonic River in slurry during remediation. Section 5.5 of the Revised T&D Plan states that “hydraulic transport does not require additional infrastructure and is expected to require little to no ecological disturbance in addition to the ecological impacts of the remediation.” However, the plan does not address the considerable environmental issues potentially associated with hydraulic transport, including the impact on the river’s ecology of the diversion of 2.68 trillion gallons of water, the possible erosion or depletion of species, and the impact of noise, lighting, and other intrusions on species breeding and habitation patterns.

The Town of Lee requests a more complete analysis, with evidence, of the ecological impact of the design and operation of hydraulic transport on the Housatonic River and the surrounding natural environment.

4. The Revised T&D Plan introduces the need for the UDF to accommodate more hydraulically transported wastes than described in the initial T&D Plan. It is assumed that the UDF is designed to accommodate this additional volume of waste, but it is not clear how the additional stream of hydraulically transported materials will be managed once it is brought into the UDF.

The Town of Lee requests that documents such as the Revised T&D Plan, Revised UDF Final Design Plan, and Revised UDF Operation, Monitoring, and Maintenance Plan state clearly that the additional hydraulic waste transported to and managed at the UDF can be accommodated by the UDF remedial design.

5. Both the 2023 T&D Plan and the 2024 Revised T&D Plan summarize the volume of estimated waste for on-site disposal and hydraulic transport. It is understood that the method of waste transport (e.g., dry versus wet) affects the volume of waste. However, the estimates of waste provided in the two plans vary for reasons that are not clear. The differences between the initial T&D Plan and the Revised T&D Plan are presented in the table below.

Estimated On-Site Disposal Volume (in cubic yards)

Reach	2023 T&D Plan	2024 Revised T&D Plan
5B	14,000	19,000
5C	348,000	235,000
6	256,600	531,600
7	106,000	42,500
8	78,000	6,600

Sources: General Electric Company, 2023, On-Site and Off-Site Transportation and Disposal Plan Table 2-1, , Table 3-1, and General Electric Company, 2024, Revised On-Site and Off-Site Transportation and Disposal Plan, Table 2-1.

The Town of Lee requests that the new estimates of on-site disposal volumes of waste by reach in the Revised T&D Plan be supported by explanation.

- Section 2.1 of the Revised T&D Plan states that “for Reach 5B, based on the PCB concentrations of the sediments to be removed and as required by Attachment E to the Revised Final Permit, *all* removed sediments from that reach must be disposed of off-site and may not be disposed of in the UDF” (emphasis added). However, truck transport of soil from Reach 5B to the UDF for on-site disposal is mentioned numerous times in the Revised T&D Plan (e.g., in the Executive Summary, Table 2-1, Section 3.3.2, Figure 4.1, and Section 4.2) in evident violation of the Revised Final Permit.

The Town of Lee requests clarification of the apparent contradiction of the Revised T&D Plan with the terms of the Revised Final Permit in proposing to dispose of waste from Reach 5A on site at the UDF.

- The Final Permit mandates the off-site disposal “at least 100,000 cubic yards of the PCB-contaminated material, including all PCB material that averages greater than or equal to 50 pp (as determined by Attachment E to the Permit).” Attachment E to the Final Permit specifies that GE will segregate and dispose of off site any soil containing high concentrations of PCB contaminants—as found, for example, in “hot spots”—so that the remaining materials disposed of in the UDF average less than 50 mg/kg PCBs (or, in the case of Reach 5B, 25 mg/kg). Table 2 of the Revised T&D Plan shows that most of the waste from Reaches 7G and 8 are slated for off-site disposal, although they are less contaminated and “would meet the criteria for on-site disposal.” The stated reason for this approach is that off-site disposal of an estimate 58,000 cy of materials from Reaches 7G and 8 will help achieve the minimum of 100,000 cy of PCB-containing material to be sent for off-site disposal.

The Town of Lee requests that the Revised T&D Plan explain why highly contaminated materials from the upstream reaches are not prioritized for off-site disposal over less contaminated materials from Reaches 7G and 8, which currently comprise more than half of the materials slated for off-site disposal.

8. The Revised T&D Plan includes plans for hydraulic dredging and conveyance of waste directly to the UDF from Reaches 5C, 6, 7B, and 7C. However, transport of Reach 5A materials is not addressed in the Executive Summary.

The Town of Lee requests that information about the transport of materials from 5A be added to the Executive Summary.

9. The Revised T&D Plan introduces new locations to be considered for rail loading, such as the Rising Pond area (Section 3.3.1). These locations are within the Rest of River footprint, and their selection is well supported by the evaluation of alternatives. They have been inventoried for natural setting features such as core areas and unique habitats. However, it may be appropriate for Natural Resources Trustees such as the Massachusetts Division of Fisheries and Wildlife to review the proposed use of these areas to determine whether there is any need to assess seasonal construction schedules and other factors to mitigate their impacts on species of interest.

The Town of Lee requests that Natural Resources Trustees review newly introduced RU-specific transportation features (such as the locations of proposed rail loading areas, construction schedules, and operational features) to determine their potential impact on unique habitats and species of interest and recommend appropriate measures.

10. According to Section 4, wastes from Reaches 7G and 8 are to be transported hydraulically to Rising Pond for loading to rail for off-site disposal. This material will require dewatering before rail loading (as indicated in Table 3-1), and Rising Pond is labeled a “potential location for a staging area for slurring material” (Figure 3-1). The decanted water is likely to be of poor quality and will require careful management to eliminate the risk of spills. The Revised T&D Plan does not describe the dewatering operation to be located at Rising Pond, which is of particular interest in that the Rising Pond area hosts valuable habitats for species of interest.

The Town of Lee requests that more detailed information be provided in forthcoming documents (such as final remedial design and work plans and RU-specific plans) about the dewatering methods and operations to be applied at Rising Pond.

11. Section 3.3 of the Revised T&D Plan states that rail/truck transport from excavation locations to disposal sites will rely primarily on intermodal containers, each capable of holding approximately 15-20 tons of waste, rather than gondola cars, each holding approximately 100 tons of waste. The stated reason for this approach is that intermodal containers are loaded once at the point of origin and unloaded once at the final destination and thus, unlike gondola cars, do not require loading and unloading adjacent to railroad tracks. Loading and unloading material into and from gondolas directly on the railroad tracks is said to require “a large material staging area (multiple acres).” Table

3-3 of the Revised T&D Plan shows the estimated minimum area required for rail loading and offloading of intermodal containers at the various remedial units, ranging from 2.2 to 3.2 acres.

The Town of Lee requests a clearer explanation of the size of handling areas required for intermodal containers and gondola cars, which, based on the information provided, appear to be approximately the same. Given that the much larger capacity of gondola cars would reduce the required number of truck trips, are there any proposed rail loading areas at which gondola cars could be used?

12. Safety concerns related to the transportation of waste materials are of principal interest to the community. The Revised T&D Plan provides considerable scenario-specific information about possible truck traffic routes (Figures 4-3 through 4-6) and estimated transportation-related concerns such as fatalities and injuries (Section 5.3). It appears that the Revised T&D Plan relies on information from the Massachusetts Department of Transportation (MassDOT) to address traffic patterns on certain anticipated travel routes. It would be useful for MassDOT to review the scenario traffic patterns to identify any problematic spots known to pose the risks of high and risk elevated rates of accidents.

The Town of Lee requests that MassDOT be given an opportunity to review the proposed traffic scenarios in the Revised T&D Plan to identify any known high-risk traffic areas that may need to be avoided.

13. The Technical Assistance Services for Communities (TASC) group has recommended establishing a community safety watch group that would include community safety leaders such as members of area fire departments and police and staff of hospitals and other healthcare providers. Among the duties of these safety professionals would be to track in real time issues related to waste transportation. To discharge this duty, watch group members should be linked to and through a communications network so they are aware of traffic patterns and are quickly informed of and prepared to deal with spills and other emergencies. As the Revised T&D Plan introduces the use of the railroad serviced by the Housatonic Railroad Company, Inc., it would be prudent to include representatives of Housatonic Railroad as members of this watch group. In addition, the watch group should include strategic community members who can convey to GE, EPA and others responsible actors community concerns and questions as they arise during remediation. This will allow community concerns to be identified and addressed during or even before the start of remedy activities. For example, if truck speed is a community concern, GE can place speed monitors to record truck speeds and ensure that drivers are following local traffic laws or face repercussions.

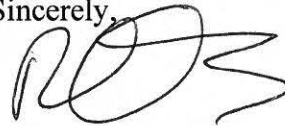
The Town of Lee requests that GE include representatives of the Housatonic Railroad Company and strategic community members in the proposed community safety watch group and that watch group members be linked in real

time to a communications network so they can better prepare for and respond to potential emergency situations and other community concerns.

14. The Revised T&D Plan introduces substantial changes from the 2023 T&D Plan, such as hydraulic transport and consideration of areas to use as rail loading areas. These changes are likely the result of guidance and comments provided by the community, EPA, and others. It may be useful to document the guidance and comments provided during the initial review to be sure all pertinent concerns were addressed. In addition, it is not clear whether the Revised T&D Plan is the final version of the T&D Plan or if further revisions will be made.

The Town of Lee requests that the Revised T&D Plan include documentation showing that all public concerns regarding the 2023 T&D Plan have been addressed.

Sincerely,



R. Christopher Brittain
Town Administrator

cc:

His Excellency Donald J. Trump, President of the United States
The Honorable Edward Markey, U.S. Senate
The Honorable Elizabeth Warren, U.S. Senate
The Honorable Richard Neal, U.S. House of Representatives
Her Excellency Maura Healey, Governor of Massachusetts
The Honorable Andrea Joy Campbell, Attorney General of Massachusetts
The Honorable Paul Mark, State Senator
The Honorable Leigh Davis, State Representative, 3rd Berkshire
Select Board, Town of Lee
PCB Advisory Board, Town of Lee

Citizens for PCB Removal Comments:

Rest of River (GECD850) - Revised On-Site and Off-Site Transportation and Disposal Plan

EPA and GE are trying to pull the wool over our eyes. Saying that hydraulic dredging will solve all the issues that have been raised concerning transportation and removal of contaminated PCB sediment from Rest of River is only presented to make people believe that this is the ultimate solution. Having the December 4 presentation at Taconic High School where we were told of the EPA decision to allow GE to utilize hydraulic dredging as the primary sediment removal process did not give concerned stakeholders adequate time to review the 424 page document submitted to EPA by GE where it was one of four possible selections.

Additionally, EPA and GE have consistently described Hydraulic dredging as "IF FEASIBLE". If/when this method should become "NOT FEASIBLE", the fall back is truck transport on our state, municipal and private roads.

Hydraulic dredging has many issues to discuss when being considered for sediment removal from a river system. It should be noted that hydraulic dredging was considered but ruled out as a possible remediation process of the Hudson River which was also contaminated by with PCBs by GE. Many of the same issues of the Hudson should also be determined when considering this process for the Housatonic River. Most notably is it is not possible to pre-determine what lies in the sediment of the river that is not visible from a cursory look at the river. Sticks, rocks and other large debris can cause havoc on the dredging equipment, causing breakdown of the pumping equipment, expensive repairs and delays to the removal process. Ideally silt-like sediment with no debris would make this process more desirable. Another issue to consider is the length of the dredge pipes for pumping sediment. Due to the distance being considered, additional pumps will be required to transport the sediment. Each additional pump will result in sound pollution in the neighborhoods where each pump is located. These devices are extremely noisy and will emit untold levels of diesel or gasoline exhaust and corresponding petrochemical particulate matter. Hydraulic dredging can also be more effective when used for horizontal pumping, but that will not be the case for the tubes that will be used to bring sediment to the UDF area where the pumps will be required to pump uphill for considerable lengths. The more vertical pumping required, the larger and noisier pumps that will be required as well as the increased number of pumps for these locations. This noise will affect the Quality of Life for those residents and wildlife within earshot of these pumps and we know how sound travels. Additionally much of the work will occur during summer months when windows are open to our homes. *There has also been mentioned that hydraulic dredging may occur outside of normal daylight hours and even continue on a 24-hour basis. We all know that nighttime noises travel longer distances as they are not interrupted by the drone of daily sound pollution. As an example, I rarely hear train whistles during the day but often hear the whistles from miles away at 3 or 4 am.*

There is one last big issue of hydraulic dredging that must be considered and should concern anyone in the towns along the river. A relatively large amount of water (~90% by weight) is sucked with the sediment to create the slurry. Using that amount of water from the normal river flow will reduce that flow significantly downstream in the river from the pumps. If you reduce the river flow, it will cause more of the river banks to be exposed to the air where it will dry out and be subject to increased dust and airborne PCB contamination to our neighborhoods and onto higher air currents that can travel vast distances to impact inhalation and terrestrial endpoints in areas far from the immediate river

watershed. The lower flow will occur all along the river below where the dredging will occur from day one of this process. This issue was not considered during previous presentations by GE or EPA. The new TAG Advisor for HRI has told us that these drying sediments actually result in more PCB airborne issues than normally experienced in a river system. It should also be stated that hydraulic dredging stirs up some contaminated sediment that will be released in the river and will also flow downstream where less water in the river will result in more air drying of those sediments and more airborne PCB dust being blown into our homes, schools, workplaces, etc. *Relying on air monitoring of "work areas" alone is unacceptable as there should be monitors all along the river corridor as any work continues, and especially where the actual river flow may be affected. Additionally, there is no mention of the discharge of the water from the dredging. Will it be tested for PCB contamination before discharge? How will it be discharged and where? Will it be placed back in the river below the UDF location and will the amount of discharge cause erosion of that portion of the river? Many more questions must be answered before this process begins.*

Lastly, this decision was as a result of so many citizens and towns being unhappy with the truck transport of PCB contaminated sediments through our residential roads. That is why so much dredging is proposed to reduce that truck traffic. As with all decisions for Rest of River they are subject to change, so I believe it is a smoke screen at this time to stop the residents and towns from objecting to the truck traffic disruptions. What is still not known and for some reason not required to be presented by GE or EPA is how the removed sediment will be replaced in the river, where clean fill will be transported from, or how many trucks will still need to travel through our towns. Because these trucks will not contain PCB sediment from the river, no one needs to address any of these issues. Yet there will be considerable truck traffic through our towns and neighborhoods and because they will contain "clean fill" there will be no controls over dust caused by these trucks. We should be informed of what the plans will be for all this traffic. *As with all submittals and agreements (whether called FINAL or not) because they are subject to change, it is our belief that hydraulic dredging will ultimately fail and the sediment will be subject to truck or train transport.*

If only one positive thing that has occurred with Rest of River issues in a long time, the EPA Challenge for Alternative Technologies has received a great response with 98 submissions from around the world. As a result, EPA has extended the evaluation deadline to February, 2025. Hopefully one of these technologies will allow a reduction in the amount of PCB contamination levels to be placed in the UDF or possibly even eliminate the need of a toxic dump the size of 10 football fields and close to 100 feet thick. *A solid review of these proposals and options should be considered before one shovelful of contamination is placed in the UDF. We must be beyond the issue of cost as the primary concern should be the ultimate protection of our citizen's health and future.* We continue to have hope that we will have a fishable and swimmable river without the need for any dumps in our area.

CPR also believes that the issue of train transport has still not been completely examined and can be increased for sediment removal. Once a train car has been loaded, it should not be unloaded to transfer to truck transport to the UDF. That sediment should go out of our county.

Following this "comment" period, there are at least 9 (NINE) new submittals due for comment in the next three weeks. The GE attorneys and engineering firm has been quite busy inundating the citizen stakeholders with a tremendous amount of work. Because these new submittals are mostly

considered revised editions of previously submittals, GE SHOULD BE REQUIRED TO HIGHLIGHT THE MODIFICATIONS FROM THE PREVIOUS SUBMITTALS THROUGH A SUMMARY PARAGRAPH/SECTION OF THE NEW DOCUMENT. Searching through these thousands of pages for the revisions is very time-consuming for us and a ruse to confuse the public. It would be simple for the editors to make these revisions.

CPR knows that we are on the correct side of the science that says ALL the PCB contamination should be removed from our river and communities and not placed in a local dump. It may take years before our side of the argument is proven to be right. The dump should, at the very least, have a rider that says it will be reversed and the contaminated fill in it be remediated in the future as the technology warrants such remediation. Similar activities are occurring across the country at former landfills that have proven to be problematic.

Charles Cianfarini

Interim Executive Director

Citizens for PCB Removal



TO: EPA R1Housatonic@epa.gov

Date: October 22, 2024

RE: Comments

To Whom It May Concern,

The Hoosic River Watershed Association (HooRWA) asks that the EPA require the General Electric Company (GE) to upgrade the culvert that carries Mill Brook under Roaring Brook Road in Lenox as part of their plan to “recondition and upgrade” Roaring Brook Road.

HooRWA is a citizens’ group that looks after the Hoosic River Watershed. We are dedicated to the restoration, conservation and enjoyment of the Hoosic River and its watershed, through education, research and advocacy. We envision a watershed that is ecologically sound and adds to the quality of life of its residents.

As we advocate for better stream crossings in the Hoosic River Watershed, we are adding our voice to this concern in the Housatonic River Watershed in solidarity with sibling organization Berkshire Environmental Action Team (BEAT). GE has just released its plan for transportation of the contaminated sediment and soil that will be removed from the Housatonic River watershed and transported either to the Upland Disposal Facility or out of state. As part of the plan, they will “recondition and upgrade” Roaring Brook Road. “100 year storms” are now occurring with greater frequency, so, to build in greater resiliency against flooding and stormwater damage, it is important that the culvert that carries Mill Brook under Roaring Brook Road be upgraded to meet MA River and Stream Crossing Standards for new crossings.

HooRWA advocates for cold water fisheries, and though our focus is in the Hoosic River Watershed, we stand in solidarity with other organizations seeking to protect cold water fisheries throughout New England. In the Housatonic River Watershed, Mill Brook is an important coldwater fisheries stream that is predicted to remain cool in the face of climate change. Native brook trout have been observed downstream of the Roaring Brook Road culvert, unable to pass upstream at certain stream flows. Ensuring that this crossing meets the MA River and Stream Crossing Standards will allow cold water fish to move up and down stream to meet their temperature requirements.

This undersized culvert also poses a danger to the road washing out due to higher streamflows during the extreme storms, caused by climate instability. Meeting the Massachusetts River and Stream Crossing Standards will help ensure that the crossing can pass these higher and more frequent storm flows.



Though GE has said that its proposal for reconditioning and upgrading Roaring Brook Road will be included in the Final RD/RA Work Plan, we feel strongly that the EPA must make clear that upgrading this road stream crossing to the Massachusetts River and Stream Crossing Standards is required.

Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink that reads "Arianna Alexandra Collins". The signature is fluid and cursive, with the first name being the most prominent.

Arianna Alexandra Collins
Executive Director, HooRWA

From: [Clare Lahey](#)
To: [R1Housatonic](#)
Subject: Revised On-Site and Off-Site Transportation and Disposal Plan
Date: Thursday, January 16, 2025 12:28:44 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

This GE revised plan does not present any clarification of the questions we've been asking. In fact, it introduces new aspects to the plan that were not in the works before. The revised plan still does not prove feasibility of hydraulic transport to UDF. They are claiming that *79% of the estimated total remediation volume would be transported for disposal without additional truck traffic*. IF FEASIBLE! They are now presenting facts detracting from the use of hydraulic transportation, such as the 7 booster pumps that would have to be used in 7B (in front of my home), *producing NOISE that may be annoying to neighbors*. And now we are being introduced to a *Woods Pond Shoreline Support* facility to be located on a postage stamp piece of level ground at the intersection of Woodland Road and Roaring Brook Rd. Where are the plans for this out-of-the-blue facility addition. No matter how they transport the dredged material, whether de-watered or slurry, there's obviously not enough space in the area depicted on their diagrams for operations at the UDF site to effectively collect and treat the massive amounts of leachate, especially during times of high precipitation. All the transportation problems GE is facing would be alleviated if they simply trucked all the remediation volume off-site. Forget the trains. They have clearly demonstrated in their evaluations of all the possible rail/truck and truck/rail/truck scenarios that there are significant drawbacks to all the options. They don't even show us a worse-case-scenario. Transportation to the UDF and challenges of treatment and management at that site are only complicating an already difficult cleanup and alienating the community. In addition, their evaluation of Quality of Life effects shows they have no concept of the love the community has for Roaring Brook road as a recreational asset. It's recreational value to Lee and Lenox, as well as many visitors from throughout MA, is astronomical. Not only for walking, running, cross country skiing, biking, but also provides the entrance to October Mtn. State Park, the state's designated snowmobile and off the road vehicle playground. This is the first we've heard that the UDF will also be playing the role of a solid waste landfill allowing debris from building access roads and concrete from eliminating the dams. Now they're conveniently mentioning Core Habitat areas to support their arguments against the use of some areas for rr spurs. Where was this concern when they chose the UDF site, an important natural site with a significant wetland, as depicted on their maps? Just to protect that wetland will be a tremendous challenge.

Thanks for taking my comments under consideration,

Clare Lahey, [REDACTED] Lee, MA

From: [Caroline Young](#)
To: [R1Housatonic](#)
Subject: Revised On-Site and Off-Site Transportation and Disposal Plan
Date: Monday, January 13, 2025 7:18:39 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Sir or Madam:

The following are comments regarding Revised On-Site and Off-Site Transportation and Disposal Plan:

1. Use available railroad sidings and add new ones where possible all with de-watering capability
 - a. Consider the Columbia Mill siding and property for staging and de-watering

2. Use rail as primary means of transportation for off site disposal
 - a. Trucks as well must be used but not through towns, neighborhoods and local roads unless it is the only way
 - b. Good management: use rail where rail works best and trucks where trucks work best.

3. Investigate and use alternative technology if reliable.

4. Consider quality of life and outcome of the project for local people.

5. Negotiate to eliminate the dreaded dump. It is the source of intense opposition and nearly all the problems associated
 - with the Rest of River project, and it ruins the project for everyone.

Sincerely,

David F. Carrington



Lee, MA [REDACTED]

[REDACTED]

From: [Debra Herman](#)
To: [R1Housatonic](#)
Subject: PCB clean up plan impact on Housatonic
Date: Wednesday, January 15, 2025 7:48:47 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

I find it quite disturbing that the village of Housatonic, MA must deal with the risk caused by hundreds of trucks carrying toxic waste through the center of town, as well as having to put up with noise pollution 24/7.

There must be an alternate site in Berkshire County that can tolerate this intrusion without impacting its residents. I say NO to GE's plan to use Housatonic as one of its staging areas.

Debra Herman
Housatonic MA

From: [Denitsa Hristova Balunis](#)
To: [R1Housatonic](#)
Subject: Comment Regarding Housatonic River Cleanup
Date: Sunday, December 15, 2024 11:20:44 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good morning,

I am an owner of a house on Roaring Brook Rd in Lenox.

Wanted to first alert you that the links to the documents outlining the plans for the cleanup are broken. Would be great for them to be fixed so the public can get access to the latest plans.

Additionally, the plans called for trucks with toxic materials to be transported using Roaring Brook Rd. The road is a residential one with a number of houses immediately adjacent. This is a quiet neighborhood and the trucks will be very disruptive. There is an area on the other side of the river by the railroad that is not occupied. If there is a need to transport the toxic materials, why can't they be routed that way? There is river and rail access and community impact will be minimal. Why ask the community who has been already negatively impacted by this entire situation to now put up with loud trucks and risking leaking toxic material when you can use a non-populated area and disturb fewer people?

Thanks for considering,
Denitsa

From: [Eric Gabriel](#)
To: [R1Housatonic](#)
Subject: Housatonic MA
Date: Wednesday, January 15, 2025 4:06:33 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

I would like the plan to find even more ways to limit truck traffic through Housatonic. Why can't even more contaminants be sent out by rail.. If sludge is getting pumped down from other towns why can't they be sent to their final destinations by either pumping through pipes or rail? I also worry about the amount of contaminants that will linger in the staging area. It seems fair that all towns should have equal amounts of truck traffic. Current plan has been very successful cutting it out of most but leaving the poor towns with the burden of heavy truck traffic.

Please do some more research and find a way to remove these heavy trucks from our streets.

Thank you

--

Eric Gabriel

Housatonic Ma

From: [Jean Louis](#)
To: [R1Housatonic](#)
Subject: Disturbing the Peace in Housatonic
Date: Thursday, January 16, 2025 9:27:19 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

It is disturbing that the quiet little village of Housatonic, MA, has to put up with hundreds of trucks carrying toxic waste through the center of town, as well as having to put up with noise pollution 24/7.

A better plan would be for the trucks to go out to Rte 7 from Van Deusenville Rd. There are no houses on that road. Many tourists go from Housatonic up 183 as it is a scenic drive that goes all the way to Tanglewood.

We need sleep and rest here. Please find a better solution. I say NO to GE's plan to use Housatonic as one of its staging areas.

Thank you,

Jean Louis

██████████,

Housatonic, MA ██████████

From: [berkshirehills](#)
To: [R1Housatonic](#)
Subject: Native fish populations
Date: Tuesday, December 3, 2024 7:35:05 AM


Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Thank you for an opportunity to express concerns the community may have regarding the clean up of the Housatonic River.

What studies or considerations have been given to the impact of the existing fish populations. Will GE be required to restock if clean up efforts negatively impacted native fish? Specifically populations of large and small mouth bass, pickerel and north pike could likely be killed off during dredging operations, short or long term. Also assuming efforts start upstream, will water clarity downstream be continuously impacted throughout the operations? As an avid fisherman the river north of woods pond provide great fishing opportunities for me and I'm very concerned with this work and my ability to enjoy the river. Please do what you can to consider fishing opportunities downstream and ensure that GE is held accountable and does not intend to let nature take its course regarding native fish populations.

Thank you

Michael Daoust

 Pittsfield

January 15, 2025

Public Comment submitted by

Michelle Loubert

Great Barrington, MA

Re: GE PCB Transportation Plan as it pertains to Reach 8 Rising Pond
Comments regarding transportation and neighborhood disruption

Submitted to: R1Housatonic@epa.gov

To whom it may concern:

Thank you for accepting this public comment regarding GE's most recent plans pertaining to Reach 8 in Housatonic, MA.

Although I live on Division Street, Great Barrington, my property is in the vicinity of Van Deusenville Road, Front Street, and Park Street in Housatonic, MA. I have high concern regarding GE's PCB removal plan for the Rising Pond, as well as their transportation plans. **Please note:** I have raised concerns regarding GE's plans since December 2023 with the Great Barrington Selectboard. These concerns were raised in connection with another town issue. When I requested to place my concerns on a Selectboard meeting agenda, my request was denied. Therefore, thank you for allowing me to bring forward my concerns at this time.

Of particular concern is the rail and truck transport as well as the removal of the PCBs itself. Per the Berkshire Eagle (and supported by information contained in the most recent GE document (title), "...but there will still be trucks – including an estimated 470 total trips running north on Van Deusenville Road through the village of Housatonic on Front Street, and up the curves of Route 183..." and "there will be the sound and activity of machines at the site of GE's planned rail spur and staging area off Van Deusenville. There will also be railroad noise in the night, since the railroad company can't move the cars around during "normal working hours."

What does this mean? A nightmare for the residents of the Rising Pond area (Van Deusenville, Division Street, Route 183 a/k/a Park Street North, Front Street, etc.).

Numerous neighborhood clusters surround the Rising Pond location. From what I understand, the remediation of Rising Pond will be 24/7 – and quite disruptive to the Housatonic community. While our State Representative has voiced concerns about trucks traveling down Front Street in Housatonic, she has not addressed noise and other issues that will have a safety and health impact on those residing in the Rising Pond vicinity – including my family. One should note that in many comments made during town public meetings about this project, I have not heard any mention of an affordable/senior housing project that is located directly across from

Rising Pond. Many of the residents are quite elderly and in poor health. They have nowhere else to go. The PCB project at Rising Pond is nothing short of cruel to those senior citizens.

Additionally, Housatonic neighborhoods are the home to many families – some struggling economically. They, too, have nowhere else to go. Also, there are many children living in the area – they will need to get up in the morning and go to school. How? After listening to banging and clanking all night long? This is a detriment to their education and wellbeing.

Then, we have families like my family. I was born and raised in the area. I live in the family homestead. Not only do I have “nowhere else to go” during this project – I don’t want to leave my family’s homestead to escape truck traffic, rail noise, etc.

I have deep concerns regarding the railroad transport since the railroad has taken advantage of the Van Deusenville neighborhood for years – most recently, by the dumping of debris along the side of the road (which has been there since December 2023). I am told by town officials – there’s nothing that can be done. Does this mean that neighborhood residents will be subjected to ongoing abuse by the railroad during the cleanup project? And there will be nothing we can do about it? Sounds like it.

Since December 2023, I’ve been expressing concerns regarding a “staging area” in my neighborhood. This fell on my town officials’ deaf ears – including our new State Representative (a former member of our Selectboard), Leigh Davis.

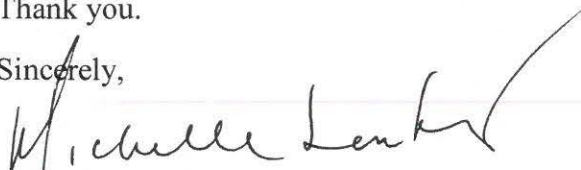
PLEASE do not destroy our community (Housatonic), our residential neighborhoods surrounding the project, and our quality of life. As someone who would like to retire in the near future, I do not want my retirement years barraged by trucks, the railroad, banging and clanging at all hours, day and night.

Please show some understanding and consideration to the residents of Housatonic during this project.

On another note, I am enclosing something that may interest you regarding a 1983 permit for a gravel bed abutting the Housatonic River and possessing “a strong likelihood for containing prehistoric archaeological sites and possibly unmarked human burials.” Doing some research on this, I could not determine if an archeological survey was ever done. But I’m assuming this should be considered before this project begins at the Rising Pond area (a/k/a Reach 8).

Thank you.

Sincerely,



Michelle Loubert



July 21, 1989

William Nolan
Oak St.
W. Stockbridge, MA 01266

RE: Proposed subdivision, VanDeusenville Rd. & Division St.,
Great Barrington

Dear Mr. Nolan:

It has recently come to the attention of the Massachusetts Historical Commission that you are currently seeking a permit for gravelling at the site of the proposed project referenced above.

The project area is considered to possess a strong likelihood for containing prehistoric archaeological sites and possibly unmarked human burials. Since the area has not been systematically surveyed by archaeologists, no archaeological sites have yet been recorded within the project area. In New England, archaeological sites are usually buried in the soil and thus require systematic test excavations to be identified.

The sensitivity of the project area is principally defined by its favorable environmental characteristics, including its proximity to the Housatonic River and its proximity to known archaeological sites. Prehistoric human burials have been discovered in similar environmental settings in the Berkshires. The proposed gravelling operations and other earth-moving activities required for utilizing and developing the parcel may result in the inadvertant disturbance of unmarked human burials. Burials are protected under several state statutes (see enclosures).

Unmarked human burials that may be located within the project area can only be identified through the completion of an archaeological survey. The MHC recommends that an archaeological survey be conducted to locate and identify unmarked human burials and other archaeological remains that may be located within the project area. The survey should include subsurface testing and background research, and should be conducted as early as possible in the planning stages of the project. The results of the survey will enable you to take prudent and feasible steps to avoid impacting any burials that may be discovered during the archaeological survey and allow the project to continue in an efficient and cost-effective manner.

Massachusetts Historical Commission, Valerie A. Talmage, *Executive Director, State Historic Preservation Officer*
80 Boylston Street, Boston, Massachusetts 02116 (617) 727-8470

Office of the Secretary of State, Michael J. Connolly, *Secretary*

William Nolan
July 21, 1989
Page 2 of 2

If the proposed project requires any state or federal approvals, permits, or funding (e.g., EOE/MEPA, MDPW, DEQE, EOCD, or Army Corps of Engineers), the project must be reviewed by the MHC in compliance with the National Historic Preservation Act of 1966 as amended, and M.G.L. Ch 9, ss. 26-27c as amended by Ch. 254 of the Acts of 1988 (950 CMR 71). Even if the project does not require review, consultation with the MHC can provide substantial benefits to developers. Staff of the MHC would be happy to assist you in developing an appropriate strategy to identify and protect significant archaeological resources that are likely to be present in the project area.

These comments are provided in compliance with M.G.L. Ch. 114, ss. 17, Ch. 659 of the Acts of 1983, and Ch. 9, ss. 26-27c as amended by Ch. 254 of the Acts of 1988 (950 CMR 71). Please contact Ed Bell of my staff if you have any questions or require further assistance.

Sincerely,

Brona Simon

Brona Simon
Deputy State Historic Preservation Officer
State Archaeologist
Director, Technical Services Division
Massachusetts Historical Commission

Enclosure

xc: Great Barrington Board of Selectmen
Great Barrington Planning Board
Great Barrington Conservation Commission
Great Barrington Historical Commission
Ellen L. Ginzel, Great Barrington
Secretary John P. DeVillars, EOE/MEPA
DEQE, Western Regional Office
Mass. Dept. of Food & Agriculture, Land Use Division
John Peters, Commissioner on Indian Affairs

From: Ron Bisiewicz
To: [R1Housatonic](#)
Subject: Housatonic and GE River Cleanup
Date: Tuesday, January 14, 2025 8:46:22 AM

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I find it quite disgusting that the quiet little village of Housatonic, MA, has to put up with hundreds of trucks carrying toxic waste through the center of town, as well as having to put up with noise pollution 24/7.

There has to be somewhere else in Berkshire County that can tolerate this intrusion without impacting its residents. I say NO to GE's plan to use Housatonic as one of its staging areas.

Ron Bisiewicz
Housatonic Resident

Sent from my iPad

From: [Simone](#)
To: [R1Housatonic](#)
Subject: NO to GE'S plan to use Housatonic as staging area
Date: Thursday, January 16, 2025 8:24:23 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

To whom it may concern,

I find it extremely disturbing and unacceptable that the quaint little village of Housatonic, MA has been made to put up with hundreds of trucks carrying toxic waste through the center of town. Additionally, residents are forced to tolerate noise pollution all day, every day.

There has to be somewhere else in Berkshire County that can tolerate this intrusion without impacting its residents. I say NO to GE's plan to use Housatonic as one of its staging areas.

Simone Shieh
Great Barrington

From: [Steve Ball](#)
To: [R1Housatonic](#)
Subject: Feedback on Transportation Plan
Date: Tuesday, January 14, 2025 1:36:18 PM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

I am a Lenox Dale, MA resident writing to express concerns about the GE Rest of River Clean Up transportation plan.

I am excited about the significant increased use of trains for the removal of sediment. I would like to hear that the same system will be required to be utilized to ship needed fill to replace the sediment (instead of hundreds or thousands of truck trips with clean fill on our roadways).

I would like to know what plans are in place for the construction of the UDF in Lee - how much will train be utilized for bringing materials in and taking materials out for that significant portion of the project across these next 13 years, and especially in the initial pre-dredging years? I would like to hear that there will be a significant use of trains to transport the needed fill and/or any removal from the UDF during its construction phase.

My third question centers around one of the stated goals being to minimize the carbon footprint of the transportation, and yet the shortest and flattest route for trucking to and from the UDF is being overlooked or averted in favor of a much longer route that has significant inclines (more fuel used, more emissions created). The path from the UDF to the Mass Pike is shortest along Mill Street and Columbia Street and Center Street and Main Street in Lee - less than 5 miles total of travel with no significant incline or topography change. This 5-mile route, mixed industrial area, business area, and residential area, has served the industrial corridor along Crystal Street in Lenox Dale and the listed streets above in Lee for generations (though there is need for repair of one bridge on Mill Street at this time). The proposed route involves travelling 2 miles up and down hill on Walker Street in Lenox Dale, then 7 miles up and down hill on route 7 to Stockbridge, then 5 miles on route 102 to the Mass Pike - also a mixture of residential, business and industrial zoning, but approximately 14 or 15 miles total (notably 3x the direct distance, and considerably more hills to be conquered). I do not understand any reasoning behind the longer haul, the increase of fuel usage and emissions, time, wear and tear on the roadways, passing many more homes and businesses, added disruption of traffic, etc. - all increases by hundreds of percentage points by opting for this 300% longer, more round-about way to access the Mass Pike from the UDF. I would like to hear that the required truck route from UDF to Mass Pike will be the shortest route including Mill Street, Columbia Street, Center Street, and Main Street - all in Lee - to significantly reduce the emissions, number of miles and amount of time trucks will spend on the roadways in Berkshire County.

Steve

Steve Ball, Shakespeare & Company General Manager

██████████, Lenox, MA ██████████ • ██████████

From: [Susan Friedman](#)
To: [R1Housatonic](#)
Subject: Location of of Revised GE Remediation transportation plan
Date: Tuesday, December 3, 2024 8:00:28 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear Sir, or Madam:

As I live off of Holmes Road in the Southview Condominiums I am particularly interested in knowing what the revised GE remediation transportation routes will be in this new plan. I did not see that mentioned in the Berkshire Eagle article. where might I find out that information?

From what I read in the article in the Eagle the proposed decibel and particulates levels are unacceptable. I wonder if GE's executives would tolerate this travesty in their neighborhoods. Because we are a lower income community than the places where they probably, live they think that this is an adequate solution. Shame on them and shame on our local public officials should they allow this to happen.

Susan Friedman,
President, Southview Condominium Association

From: [Tom O'Leary](#)
To: [R1Housatonic](#)
Subject: Housatonic river clean up
Date: Tuesday, January 14, 2025 7:55:11 AM

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

My family lives in Housatonic. From what I've read the clean up and transportation of the sludge will be around the clock. This will make life unbearable. Rail and truck traffic noise with the accompanying dust and spills will destroy our small village.

This brings us to another point. Who is accountable for this work? How do we get anyone to listen when something happens (and it will). Will the EPA be on site 24/7 because those of us living here will be.

Thank you
The O'Leary family

Sent from [Mail](#) for Windows