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General Electric Company

Road Assessment Work Plan

**Housatonic River – Rest of River
Pittsfield, Massachusetts**

June 2025

Road Assessment Work Plan

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**Housatonic River – Rest of River
Pittsfield, Massachusetts**

June 2025

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██████████ Standard Operating Procedure: Continuous Road Monitoring Using Video Imaging

Abbreviations

ASTM	ASTM International
CCI	Critical Condition Index
EPA	United States Environmental Protection Agency
GE	General Electric Company
GPR	ground-penetrating radar
GPS	global positioning system
Final RD/RA Work Plan	<i>Final Remedial Design/Remedial Action Work Plan</i>
Final Revised ROR SOW	<i>Final Revised Rest of River Statement of Work</i>
IRI	International Roughness Index
OCI	Overall Condition Index
PCI	Pavement Condition Index
Revised QOL Plan	<i>Revised Quality of Life Compliance Plan</i>
ROR	Rest of River
RU	remediation unit
Second Revised QOL Plan	<i>Second Revised Quality of Life Compliance Plan</i>
SIP	Supplemental Information Package
SOP	Standard Operating Procedure
UDF	Upland Disposal Facility

1 Introduction and Background

On December 16, 2020, pursuant to the 2000 Consent Decree for the GE-Pittsfield/Housatonic River Site, the United States Environmental Protection Agency (EPA) issued to the General Electric Company (GE) a final revised modification of GE's Resource Conservation and Recovery Act Corrective Action Permit (EPA 2020) for the Housatonic Rest of River (ROR), which required GE to implement the ROR Remedial Action selected by EPA to address polychlorinated biphenyls in the ROR. The ROR is that portion of the Housatonic River and its backwaters and floodplain (excluding certain residential lawn areas) located downstream of the confluence of the East and West Branches of the Housatonic River, in Pittsfield, Massachusetts. The ROR has been segmented into separate remediation units (RUs), or reaches, to manage workflow and schedule for the ROR Remedial Action. The ROR Remedial Action also includes the construction and operation of an on-site Upland Disposal Facility (UDF) for the disposal of a portion of the sediments and soils removed from the ROR area. The ROR Remedial Action is generally referred to herein as the "ROR project."

On November 22, 2024, GE submitted a *Revised Quality of Life Compliance Plan* (Revised QOL Plan; Anchor QEA, LLC and Arcadis 2024), which included a discussion of road assessment activities that will be performed to document the pre-, during-, and post-remediation conditions of local municipal roads (paved and unpaved) and associated infrastructure (e.g., bridges and culverts) that may be used for the transportation of ROR project materials. The purpose of these road assessment activities is to obtain the information necessary to evaluate whether the ROR project related transportation has had any impact on the roads and infrastructure beyond the normal wear and tear sustained by the road network during implementation of the ROR project. On April 9, 2025, EPA issued a conditional approval letter for the November 2024 Revised QOL Plan. That letter approved the general approach outlined in the plan for the monitoring of roadway infrastructure conditions (i.e., Section 6.2 of the Revised QOL Plan) and directed GE to submit, for EPA review and approval, a road assessment work plan to outline the documentation and baseline assessment of pre-existing conditions of local municipal roads and the assessment of such roads during and after construction. This Road Assessment Work Plan is being submitted to fulfill that requirement.

The April 9, 2025 conditional approval letter from EPA also directed GE to further revise the Revised QOL Plan, including minor updates to Section 6.2, and submit the revision to EPA for review and approval. That document, *Second Revised Quality of Life Compliance Plan*, was submitted to EPA on May 15, 2025 (Second Revised QOL Plan; Anchor QEA, LLC and Arcadis 2025) and was approved by EPA on May 28, 2025, 2025. This Road Assessment Work Plan was developed based on the approach outlined in Section 6.2 of the Second Revised QOL Plan for monitoring of roadway infrastructure conditions.

The timing of this Road Assessment Work Plan allows for the first pre-construction assessment to be conducted on local municipal roads associated with construction of the UDF (i.e., the first substantial ROR-related construction activity) before on-site construction work starts for the UDF. In addition, the assessment proposed in this work plan includes the local municipal roads anticipated to be associated with the Reach 5A construction. After EPA approval of this Road Assessment Work Plan, the procedures and proposed roads described herein will be reviewed periodically – e.g., after EPA approval of the Supplemental Information Package (SIP) for the UDF and/or the Final Remedial Design/Remedial Action Work Plan (Final RD/RA Work Plan) and/or SIP for each RU – to ensure that the information contained in this plan is still valid. Additional meetings with local municipalities are also anticipated during development of the future design documents to discuss potential updates to RU-specific information on specific transportation routes to the UDF, to rail loading areas, and/or from backfill sources. If additional transportation routes are identified in the SIP for the UDF and/or the Final RD/RA Work Plan or SIP for each RU, such routes will be reviewed and EPA will be advised as necessary. If the addition of such

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routes would require a revision or addendum to the EPA-approved Road Assessment Work Plan, GE will submit such revision or addendum in advance of the relevant construction activities on a schedule anticipated to allow for any required additional pre-construction assessments to be conducted prior to the associated construction activities.

2 Data Collection

This section includes a description of data collection activities that will be performed to document the conditions of local municipal roads and associated infrastructure (e.g., bridges and culverts) before, during, and after the ROR project construction activities. The data evaluation and documentation, including an evaluation of whether the ROR project-related transportation has had any impact on the assessed roads and infrastructure beyond the normal wear and tear sustained by the road network during the pertinent construction time period, are discussed in Section 3. The pre-, during-, and post-remediation road and infrastructure assessments will include approved routes identified on local municipal roads (i.e., the municipal roads leading to, but not including, the state or federal roads) in the City of Pittsfield and in the Towns of Lenox, Lee, and Great Barrington.¹ The proposed routes are illustrated on Figures 1 through 4 and summarized in Table 1. As indicated on the figures and in the table, GE intends to collect information on routes anticipated to be subject to transportation activities for the ROR project. GE also intends to collect information on routes not anticipated to be subject to transportation activities for the ROR project in order to assess background (i.e., non-project-related) conditions.² Comparison of the two groups of routes will be used to help evaluate whether assessed conditions can be attributed to road traffic associated with the ROR project, rather than normal wear and tear, as discussed in Section 3. The local municipal road routes anticipated to be subject to transportation activities for the ROR project, as illustrated on Figures 1 through 4, are based on the routes included for Scenario 4 in the *Revised On-Site and Off-Site Transportation and Disposal Plan* (Arcadis 2024), which was conditionally approved by EPA on April 29, 2025.

After EPA approval of this Road Assessment Work Plan or any subsequent revision/addendum, but before the start of the associated on-site construction work, a pre-construction assessment will be performed to assess the baseline condition of the local municipal roads and associated infrastructure along the identified travel routes. For municipal roads where reconditioning and/or upgrading are likely to be needed prior to their use during construction (e.g., gravel portions of Roaring Brook Road, Woodland Road, and Valley Street), the pre-construction assessment will be performed before the reconditioning/upgrading is performed. The assessments conducted during and after ROR project activities will be performed on the same routes and using the same procedures and methods as those included in the pre-construction baseline assessment in order to allow for comparison of the results from each event. The schedule for the pre-, during-, and post-remediation road and infrastructure assessments is further described in Section 3.

The methods for measuring and assessing the baseline condition of the local municipal roads and associated infrastructure will include the following, as appropriate:

- Road imaging technology, including video and/or photographic technology, to document the condition of roads; and
- Photographic documentation of the condition of infrastructure associated with such roads, including bridges, culverts, or other exposed infrastructure that is not captured by road imaging technology.

Although there may be some overlap in coverage, the specific technology and process to be used to assess paved roads will be more quantitative than those used to assess unpaved roads and infrastructure, as discussed in the sections below. The processes described below will be repeated for the pre-, during-, and post-construction

¹ There are no routes currently anticipated on local municipal roads in the Town of Stockbridge; however, if a route or routes are identified in that town that require assessment, they will be included in a revision or addendum to this work plan.

² Background roads are considered comparable paved roads outside of the routes anticipated for use during the project but expected to receive similar levels of traffic not related to the ROR project.

assessments, and the data collected during the pre-construction baseline assessment will be used for comparison with the data from the during- and post-construction assessments (see Section 3).

2.1 Paved Roads

To assess the condition of paved municipal roads to be used during the ROR Remedial Action, GE will use specialized data collection vehicles equipped with sensors and instruments such as the following:

- **Laser crack measurement system:** This system will be used to detect, measure, and document the extent and severity of cracks on the pavement surface via the system's lasers and imaging techniques.
- **High-resolution cameras:** These cameras will be used to capture images of the pavement surface, providing visual data on cracks, rutting, potholes, and other defects.
- **Global positioning system (GPS):** GPS will be used to georeference pavement distress data and images to allow for the accurate mapping of pavement conditions.

These imaging and measurement technologies will document a 360-degree and three-dimensional view of the pre-existing condition of the paved municipal roads to be used during construction, as required by Section 4.3.1.3 of the *Final Revised Rest of River Statement of Work* (Final Revised ROR SOW; Anchor QEA et al. 2021). Data will be collected in accordance with ASTM International's (ASTM's) Standard Practice for Roads and Parking Lots Pavement Conditions Index Surveys (ASTM D6433).

The road-scanning sensors and instruments will continuously gather data as the data collection vehicles travel along the road segments, and the associated imagery of the surrounding areas will be extracted at 15- to 20-foot intervals. The road-scanning data will include measurements of pavement distress and other key pavement parameters. Two-way roads will receive two passes (one per lane) with the data collection vehicle, and one-way roads will receive a single pass per lane. Based on this information, ratings such as Pavement Condition Index (PCI), Critical Condition Index (CCI), International Roughness Index (IRI), and Overall Condition Index (OCI) will be created to identify and define each distress type and its severity and extent (based on the ASTM D6433 testing methodology). Experienced pavement evaluators will review the road segment's collected images for a complete and thorough evaluation of the existing pavement condition in accordance with the ASTM D6433 pavement distress rating process.

In addition, ground-penetrating radar (GPR) technology will be used where needed to assess the subsurface conditions of the paved local municipal roads before use. The need for GPR will be based on review of the preliminary results collected with road imaging technology and photographs. The Standard Operating Procedure (SOP) for the use of GPR is presented in Appendix BB to GE's latest revised Field Sampling Plan/Quality Assurance Project Plan (Arcadis 2023b).

2.2 Unpaved Roads

For unpaved municipal roads, visual assessments (i.e., imaging) will be made to document the general condition; however, the surface will not receive a quantitative rating since quantitative pavement ratings are not applicable to unpaved roads. GE will evaluate the unpaved local municipal roads from a vehicle using a high-resolution camera to capture images of the surface, providing visual data on corrugation, rutting, potholes, and other defects. The unpaved roads will be assessed in general accordance with the example SOP provided in Appendix A (or a similar SOP from a specialized vendor to administer the assessment, as applicable).

To the extent practicable, images will be georeferenced using GPS to allow for the accurate mapping of the conditions. However, given that some of the unpaved roads are remote from populated areas and that some roads may be too rough for sensitive equipment with georeferencing capabilities, georeferencing may be infeasible or impractical in some locations. In those cases, a field log will be maintained to reference approximate mileage along the unpaved road where images are collected. Two-way roads will receive two passes (one per lane) with the data collection vehicle, and one-way roads will receive a single pass per lane. Images will be collected at least every 100 feet or more often as needed to sufficiently document areas with observed defects. These images will document a 360-degree and three-dimensional view of the pre-existing condition of the unpaved local municipal roads to be used during construction, as required by Section 4.3.1.3 of the Final Revised ROR SOW.

2.3 Infrastructure

For infrastructure not captured by the imaging technology proposed for the paved and unpaved roads, GE will separately capture and archive imagery of the infrastructure. Standardized photograph locations (with position and direction) will be established in the field to document this infrastructure. The standardized photo locations will be marked on a map and the appropriate mileage along the associated road where images are collected will be noted in the field log (discussed above), and an accompanying photographic log will be established so that pre-, during-, and post-construction images can be easily compared (see Section 3).

3 Schedule, Data Evaluation, and Reporting

GE will initiate the pre-construction assessment field activities described herein for the routes first associated with UDF construction after EPA approval of this Road Assessment Work Plan but before the start of the associated on-site construction work for the UDF and subject to vendor availability and weather constraints. To the extent practicable, the field assessment will be scheduled during favorable weather conditions (i.e., without leaves, rain, snow, etc. on the roadway that may impair visibility or the usability of equipment), likely in late summer/early fall. It is anticipated that the field data collection will be completed within a week, and that the associated pavement ratings will be generated by the vendor within one to two months after completing field activities. GE will make best efforts to collect data and images during the same general time of year for each subsequent assessment (i.e., during- and post-construction assessments), unless otherwise necessary to meet overall project schedule requirements.

Given that the schedules for construction of the UDF and remediation in each RU will vary (and thus associated road usage will vary), the schedules for the pre-construction, during-construction, and post-construction assessments will differ for the different road segments. Table 1 shows the remediation component (i.e., UDF or RU) for which each road (or road segment) is anticipated to be used, and thereby indicates the general schedule for when each route will undergo pre-, during-, and post-construction assessments; and it also lists the type of road assessment, if any, to be performed in 2025, 2026, and 2027 for each road (or segment). All local municipal roads (and associated infrastructure) currently anticipated to be used during the ROR project are summarized in Table 1 and shown on Figures 1 through 4.³

Site preparation at the UDF area is anticipated to start in fall 2025, and subsequent construction of the UDF is anticipated to start in spring 2026. Therefore, the local municipal roads (and associated infrastructure) currently anticipated to be used during UDF construction, as summarized in Table 1 and shown on Figures 1 and 2, will be assessed in 2025 (pre-construction assessment) and in 2026 and 2027 (during-construction assessment).⁴ Construction for the RUs will commence in 2028, beginning with Reach 5A. Therefore, in 2027, a pre-construction assessment will be performed for the local municipal roads (and associated infrastructure) currently anticipated to be used during project activities in Reach 5A (including potential contingency routes), as summarized in Table 1 and shown on Figures 1 and 3. For the remaining routes illustrated on Figures 1 through 4, the pre-construction assessments will be conducted in the year prior to the construction activities in the associated RU, as indicated in Table 1, and the during-construction assessments will be performed annually during the construction period in which these roads are used. For all local municipal roads, the same procedures and methods used to perform the pre-construction assessment will be repeated for the during-construction assessment(s) for the same roads.

After construction is completed in some areas and use of certain routes is no longer anticipated, a post-construction assessment will be performed. The same procedures and methods used to perform the pre-construction and during-construction assessments will be repeated for post-construction assessment for the same local municipal roads and infrastructure.

³ As discussed above, if additional truck routes are identified in the SIP for the UDF and/or the Final RD/RA Work Plan or SIP for a given RU, such routes will be reviewed and EPA will be notified; and if the addition of such routes would require a revision or addendum to the EPA-approved Road Assessment Work Plan, such revision or addendum will be submitted.

⁴ Although the schedule outlined in the approved Second Revised QOL Plan for the road assessments requires that during-construction assessments be repeated every two years, with a minimum of one assessment for each road (for routes anticipated to be used for less than two years), GE has elected to conduct during-construction assessments annually for all local municipal roads and infrastructure that were evaluated prior to construction (unless and until GE proposes otherwise in a revision of or addendum to this work plan).

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The results of the first during-construction assessment will be compared to those of the pre-construction assessment; and thereafter, as appropriate, the results of the during-construction assessment(s) will be compared to the results of the prior assessment(s) conducted during construction. Similarly, the results of the post-construction assessment will be compared to those of the prior assessments. During these assessments, comparisons will also be made between the results from ROR project roads and those from background roads. The purpose of these various comparisons will be to help evaluate whether the conditions of the ROR project roads can be attributed to road traffic associated with the ROR project, rather than normal wear and tear (similar to that found on the surrounding road network or anticipated on similarly constructed roads with similar traffic). The comparison process for paved and unpaved roads and infrastructure will be as follows:

- For paved roads, GE will evaluate the roadway condition based on review and comparison of standard pavement metrics (e.g., PCI, CCI, IRI, and OCI). These metrics will be compared to those from prior assessments. Further, once multiple years of data are available for a given road or road segment, a trend analysis will be performed of the different metrics, and the trend of the different metrics on the roads used for the ROR project will be compared to those on background roads. If a notable trend divergence occurs on a road or road segment subject to ROR project transportation activities, GE will conduct additional analysis to assess whether the increased rate of road degradation can be attributed to the ROR project or some other factor.
- For the unpaved roads and infrastructure, GE will evaluate the changes in conditions based on a review and comparison of the photographic log compiled during each assessment. Further, once multiple years of data are available, the evaluation will detail substantial visual differences between the most recent year's assessment results and the prior assessment(s). If notable differences are observed on unpaved roads or infrastructure being used for ROR project transportation activities, GE will conduct additional analysis, using professional engineering judgment, to assess whether these differences can be attributed to the ROR project or some other factor. As discussed above, the pre-construction assessment of the unpaved roads (and associated infrastructure) will be performed before any improvement to the roads is performed prior to their use during construction. The during-construction assessments will still be compared to the pre-construction assessment results to determine the relative condition of the road due to traffic related to the ROR Remedial Action.

Assessment of the results of the comparisons conducted during construction will be performed as described in Section 6.2.2 of the Second Revised QOL Plan, and assessment of the post-construction assessment results will be performed as described in Section 6.2.3 of that plan.

By February 15 of each year of the ROR project, GE will submit to EPA, with copies to the pertinent municipalities, an annual report summarizing the road assessment and associated evaluations performed during the prior year. In accordance with Paragraph VI.A.3 of the February 2020 Settlement Agreement, such report will include photographic documentation of the condition of assessed infrastructure and roads for review by the affected municipality as appropriate.

4 References

- Anchor QEA, LLC, AECOM, and Arcadis. 2021. *Final Revised Rest of River Statement of Work*. Prepared for General Electric Company, Pittsfield, Massachusetts. September 14.
- Anchor QEA, LLC and Arcadis. 2024. *Revised Quality of Life Compliance Plan*. Prepared for General Electric Company, Pittsfield, Massachusetts. November 22.
- Anchor QEA, LLC and Arcadis. 2025. *Second Revised Quality of Life Compliance Plan*. Prepared for General Electric Company, Pittsfield, Massachusetts. May 15.
- Arcadis. 2023a. *Revised Site Health and Safety Plan*. Prepared for General Electric Company, Pittsfield, Massachusetts. July 17.
- Arcadis. 2023b. *Second Revised Field Sampling Plan/Quality Assurance Project Plan*. Prepared for General Electric Company, Pittsfield, Massachusetts. December 21.
- Arcadis. 2024. *Revised On-Site and Off-Site Transportation and Disposal Plan*. Prepared for General Electric Company, Pittsfield, Massachusetts. October 15.
- EPA. 2020. *Revised Final Permit Modification to the 2016 Reissued RCRA Permit and Selection of CERCLA Remedial Action and Operation & Maintenance for Rest of River*. December 16.

Table

Table 1
Anticipated Road Assessment Schedule
Housatonic River – Rest of River



Road	Paved or Unpaved	Approximate Centerline Miles	Municipality(ies)	Type of Assessment Anticipated per Year			Remediation Component for which Road is Anticipated to be Used								
				2025	2026	2027	UDF Construction	Reach 5A	Reach 6	Reach 5B	Reach 5C	Reach 7B/7C	Reach 7E	Reach 7G	Reach 8
Woodland Rd (between UDF entrance and Willow Hill Rd)	Paved	0.40	Town of Lee	Pre-Construction	During-Construction	During-Construction	✓					✓	✓		
Willow Hill Rd	Paved	0.61	Town of Lee Town of Lenox	Pre-Construction	During-Construction	During-Construction	✓					✓	✓		
Mill St (between Crystal St and Willow Hill Rd)	Paved	0.075	Town of Lee Town of Lenox	Pre-Construction	During-Construction	During-Construction	✓						✓		
Walker St (East of US-20)	Paved	1.5	Town of Lenox	Pre-Construction	During-Construction	During-Construction	✓						✓		
Mill St (South of Willow Hill Rd)	Paved	0.55	Town of Lee Town of Lenox	Pre-Construction	During-Construction	During-Construction	✓					✓			
Bradley St	Paved	0.26	Town of Lee	Pre-Construction	During-Construction	During-Construction	✓					✓			
Columbia St	Paved	0.81	Town of Lee	Pre-Construction	During-Construction	During-Construction	✓					✓			
Center St	Paved	0.34	Town of Lee	Pre-Construction	During-Construction	During-Construction	✓					✓			
Greylock St**	Paved	1.0	Town of Lee	Pre-Construction	During-Construction	During-Construction	**					**	**		
Orchard St**	Paved	0.36	Town of Lee	Pre-Construction	During-Construction	During-Construction	**					**	**		
Park St (between Orchard St. and intersection with US-20)**	Paved	0.043	Town of Lee	Pre-Construction	During-Construction	During-Construction	**					**	**		
Pomeroy Ave (between East St and Preston Ave)**	Paved	1.3	City of Pittsfield	--	--	Pre-Construction		**							
Pomeroy Ave (between Preston Ave and Holmes Rd)	Paved	0.25	City of Pittsfield	--	--	Pre-Construction		✓							
Holmes Rd	Paved	2.7	City of Pittsfield Town of Lenox	--	--	Pre-Construction		✓							
Utility Dr	Paved	0.37	City of Pittsfield	--	--	Pre-Construction		✓							
East New Lenox Rd (between Williams St and Sackett Brook)**	Paved	1.0	City of Pittsfield Town of Lenox	--	--	Pre-Construction		**		**					
East New Lenox Rd (between Sackett Brook and New Lenox Rd)	Paved	2.0	City of Pittsfield	--	--	Pre-Construction		✓		✓					
New Lenox Rd	Paved	1.8	Town of Lenox	--	--	Pre-Construction		✓		✓	✓				
Roaring Brook Rd	Paved	0.96	Town of Lenox	--	--	Pre-Construction		✓ ⁽¹⁾			✓				
Roaring Brook Rd	Unpaved	0.95	Town of Lenox	--	--	Pre-Construction		✓ ⁽¹⁾			✓				
Woodland Rd (between Roaring Brook Rd and Valley St)	Unpaved	1.5	Town of Lee	--	--	Pre-Construction		✓ ⁽¹⁾			✓				
Woodland Rd (between Valley St and entrance to UDF)	Paved	0.62	Town of Lee	--	--	Pre-Construction		✓	✓	✓	✓			✓	✓
Valley St	Unpaved	0.28	Town of Lee	--	--	Pre-Construction		✓	✓	✓	✓			✓	✓

Table 1
Anticipated Road Assessment Schedule
Housatonic River – Rest of River

Road	Paved or Unpaved	Approximate Centerline Miles	Municipality(ies)	Type of Assessment Anticipated per Year			Remediation Component for which Road is Anticipated to be Used									
				2025	2026	2027	UDF Construction	Reach 5A	Reach 6	Reach 5B	Reach 5C	Reach 7B/7C	Reach 7E	Reach 7G	Reach 8	
Valley St	Paved	0.42	Town of Lee	--	--	Pre-Construction		✓	✓	✓	✓				✓	✓
Crystal St (between Housatonic St and Schweitzer Br)	Paved	0.71	Town of Lenox	--	--	Pre-Construction		✓	✓	✓	✓				✓	✓
Crystal St (south of Schweitzer Br)	Paved	0.50	Town of Lenox	--	--	Pre-Construction		✓ ⁽¹⁾	✓ ⁽¹⁾	✓ ⁽¹⁾	✓ ⁽¹⁾				✓ ⁽¹⁾	✓ ⁽¹⁾
Willow Creek Rd (between Housatonic St and Woods Pond Spur)	Paved	0.15	Town of Lenox	--	--	Pre-Construction		✓	✓	✓	✓				✓	✓
Willow Creek Rd (Woods Pond Spur to Casella Waste Systems driveway)**	Paved	0.14	Town of Lenox	--	--	Pre-Construction		**	**	**	**				**	**
East St	Paved	0.50	Town of Lenox	--	--	--				✓						
Front St	Paved	0.28	Town of Great Barrington	--	--	--									✓	✓
Van Deusenville (north of anticipated site entrance)	Paved	0.42	Town of Great Barrington	--	--	--									✓	✓
Van Deusenville (south of anticipated site entrance)**	Paved	1.2	Town of Great Barrington	--	--	--									**	**
Total Paved Miles				6.0	6.0	19										
Total Unpaved Miles				0	0	2.7										

Notes:

1. Route included only as a contingency route.
 2. Approximate miles are rounded to two significant figures.
- ** Road is included to evaluate background conditions (i.e., road not anticipated to be used as an approved travel route during the remedial action).

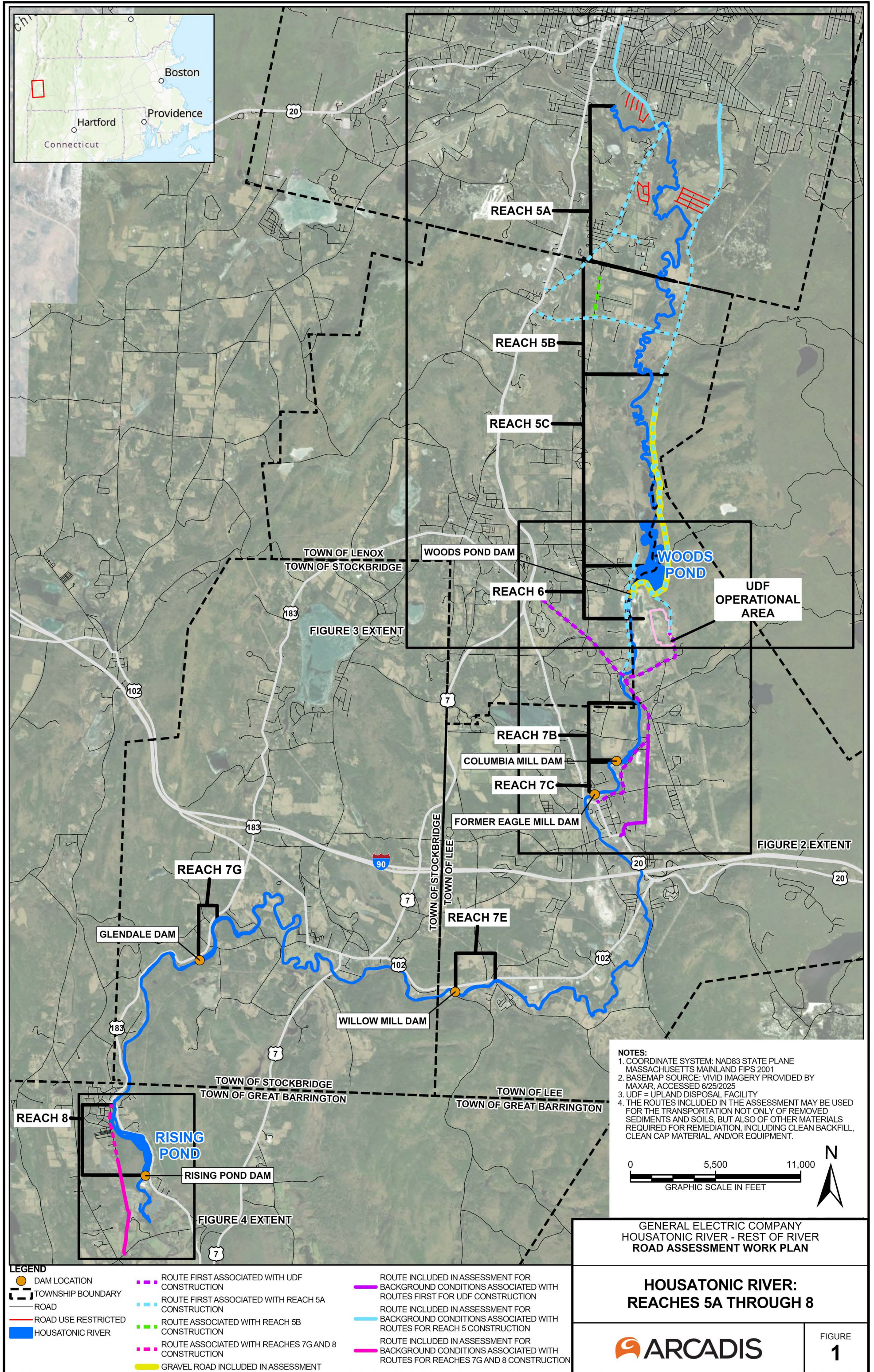
Acronyms and Abbreviations:

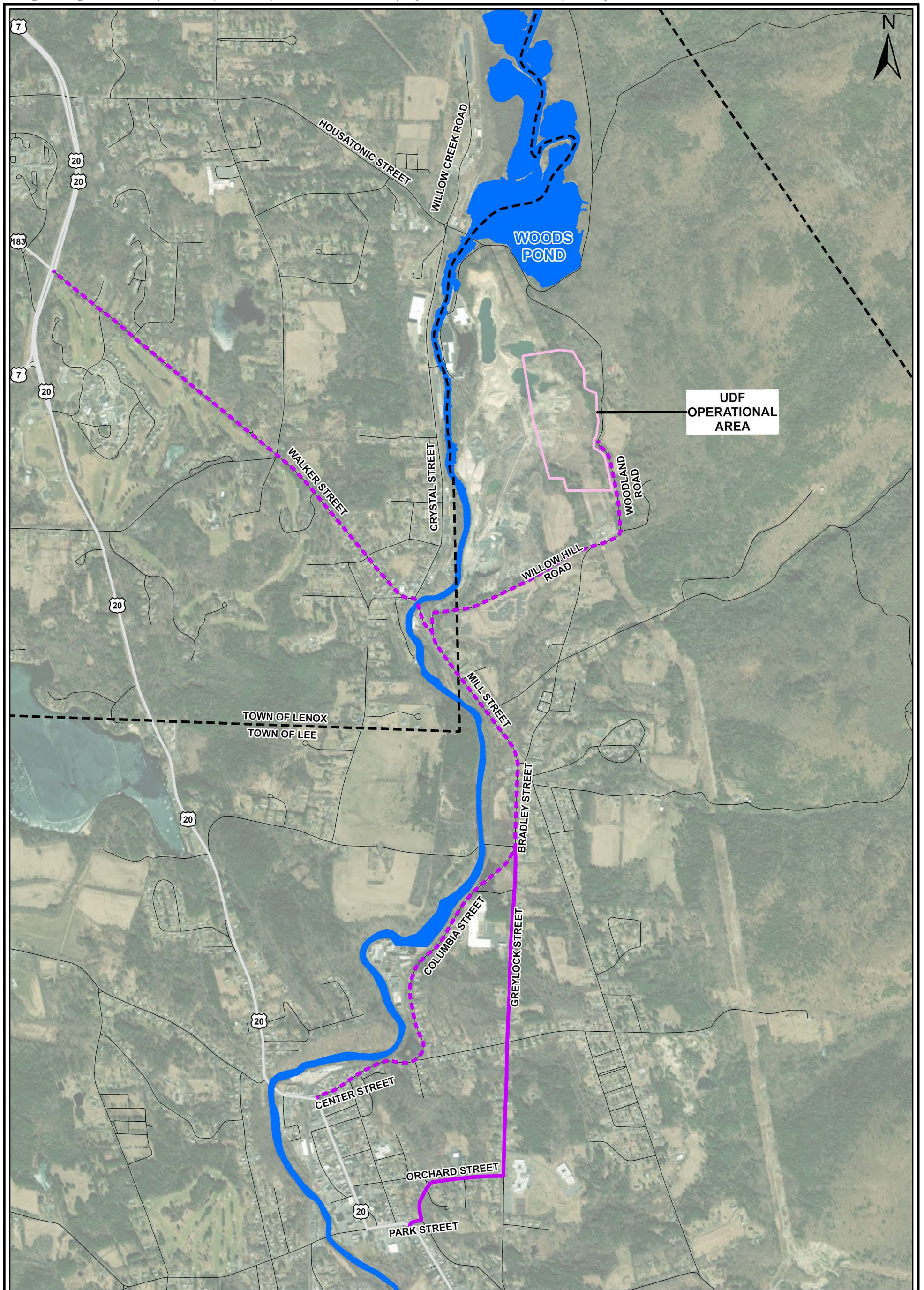
Ave = Avenue
 Dr = Drive
 Rd = Road
 St = Street
 UDF = Upland Disposal Facility

Legend:

- Route first associated with UDF construction (and associated background routes)
- Route first associated with Reach 5A construction (and associated Reach 5 background routes)
- Route associated with Reach 5B construction
- Route associated with Reaches 7G and/or 8 construction (and associated background routes)

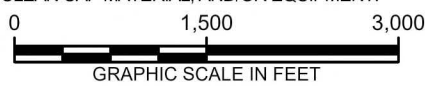
Figures





- LEGEND**
- TOWNSHIP BOUNDARY
 - ROAD
 - HOUSATONIC RIVER
 - ROUTE INCLUDED IN ASSESSMENT FOR BACKGROUND CONDITIONS ASSOCIATED WITH ROUTES FIRST FOR UDF CONSTRUCTION
 - ROUTE FIRST ASSOCIATED WITH UDF CONSTRUCTION

- NOTES:**
1. COORDINATE SYSTEM: NAD83 STATE PLANE MASSACHUSETTS MAINLAND FIPS 2001
 2. BASEMAP SOURCE: VIVID IMAGERY PROVIDED BY MAXAR, ACCESSED 6/25/2025
 3. UDF = UPLAND DISPOSAL FACILITY
 4. THE ROUTES INCLUDED IN THE ASSESSMENT MAY BE USED FOR THE TRANSPORTATION NOT ONLY OF REMOVED SEDIMENTS AND SOILS, BUT ALSO OF OTHER MATERIALS REQUIRED FOR REMEDIATION, INCLUDING CLEAN BACKFILL, CLEAN CAP MATERIAL, AND/OR EQUIPMENT.

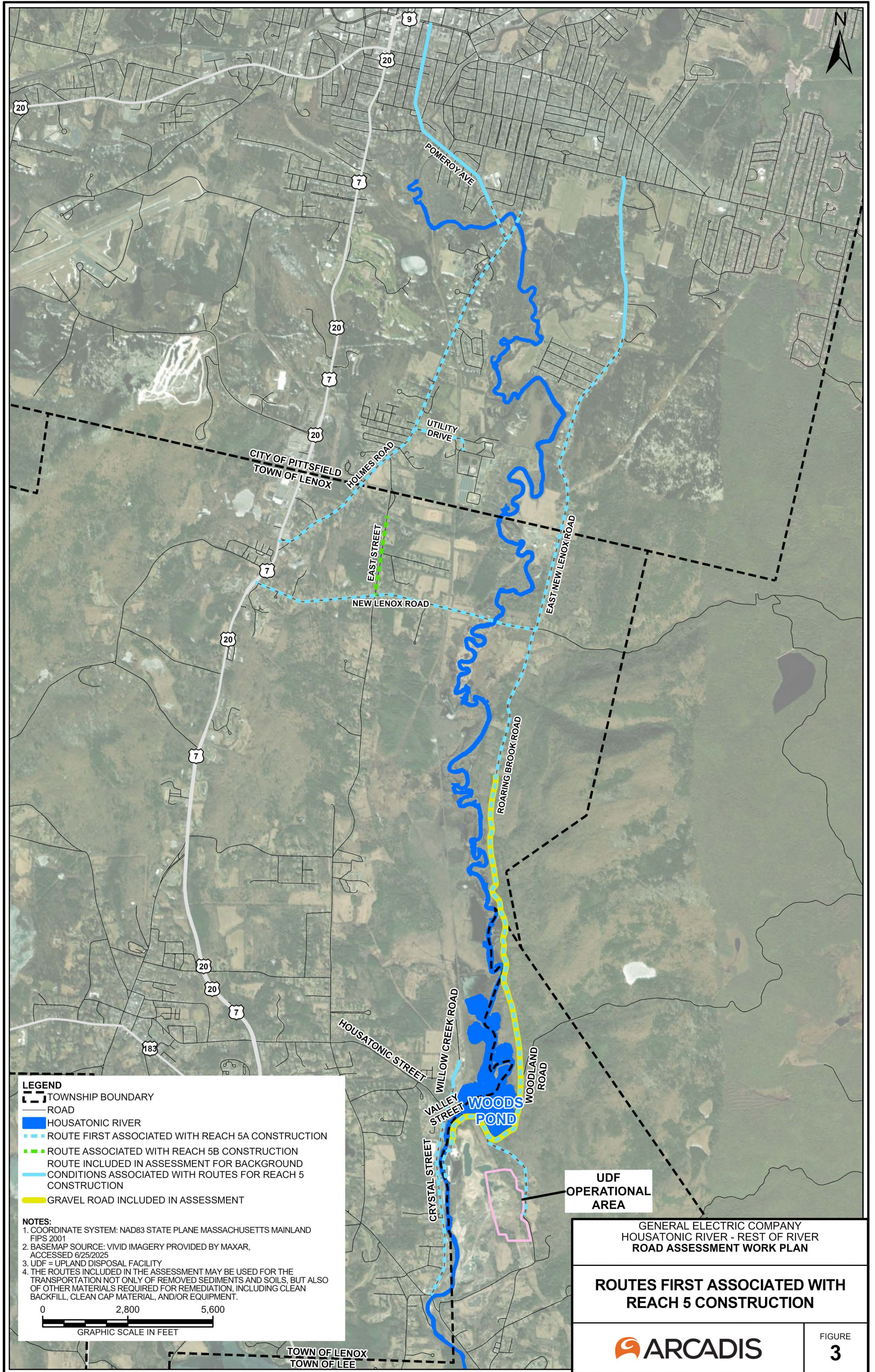


GENERAL ELECTRIC COMPANY
HOUSATONIC RIVER - REST OF RIVER
ROAD ASSESSMENT WORK PLAN

**ROUTES FIRST ASSOCIATED WITH
UDF CONSTRUCTION**



FIGURE
2

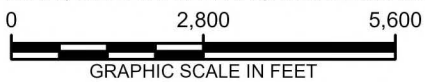


LEGEND

- TOWNSHIP BOUNDARY
- ROAD
- HOUSATONIC RIVER
- ROUTE FIRST ASSOCIATED WITH REACH 5A CONSTRUCTION
- ROUTE ASSOCIATED WITH REACH 5B CONSTRUCTION
- ROUTE INCLUDED IN ASSESSMENT FOR BACKGROUND CONDITIONS ASSOCIATED WITH ROUTES FOR REACH 5 CONSTRUCTION
- GRAVEL ROAD INCLUDED IN ASSESSMENT

NOTES:

1. COORDINATE SYSTEM: NAD83 STATE PLANE MASSACHUSETTS MAINLAND FIPS 2001
2. BASEMAP SOURCE: VIVID IMAGERY PROVIDED BY MAXAR, ACCESSED 6/25/2025
3. UDF = UPLAND DISPOSAL FACILITY
4. THE ROUTES INCLUDED IN THE ASSESSMENT MAY BE USED FOR THE TRANSPORTATION NOT ONLY OF REMOVED SEDIMENTS AND SOILS, BUT ALSO OF OTHER MATERIALS REQUIRED FOR REMEDIATION, INCLUDING CLEAN BACKFILL, CLEAN CAP MATERIAL, AND/OR EQUIPMENT.



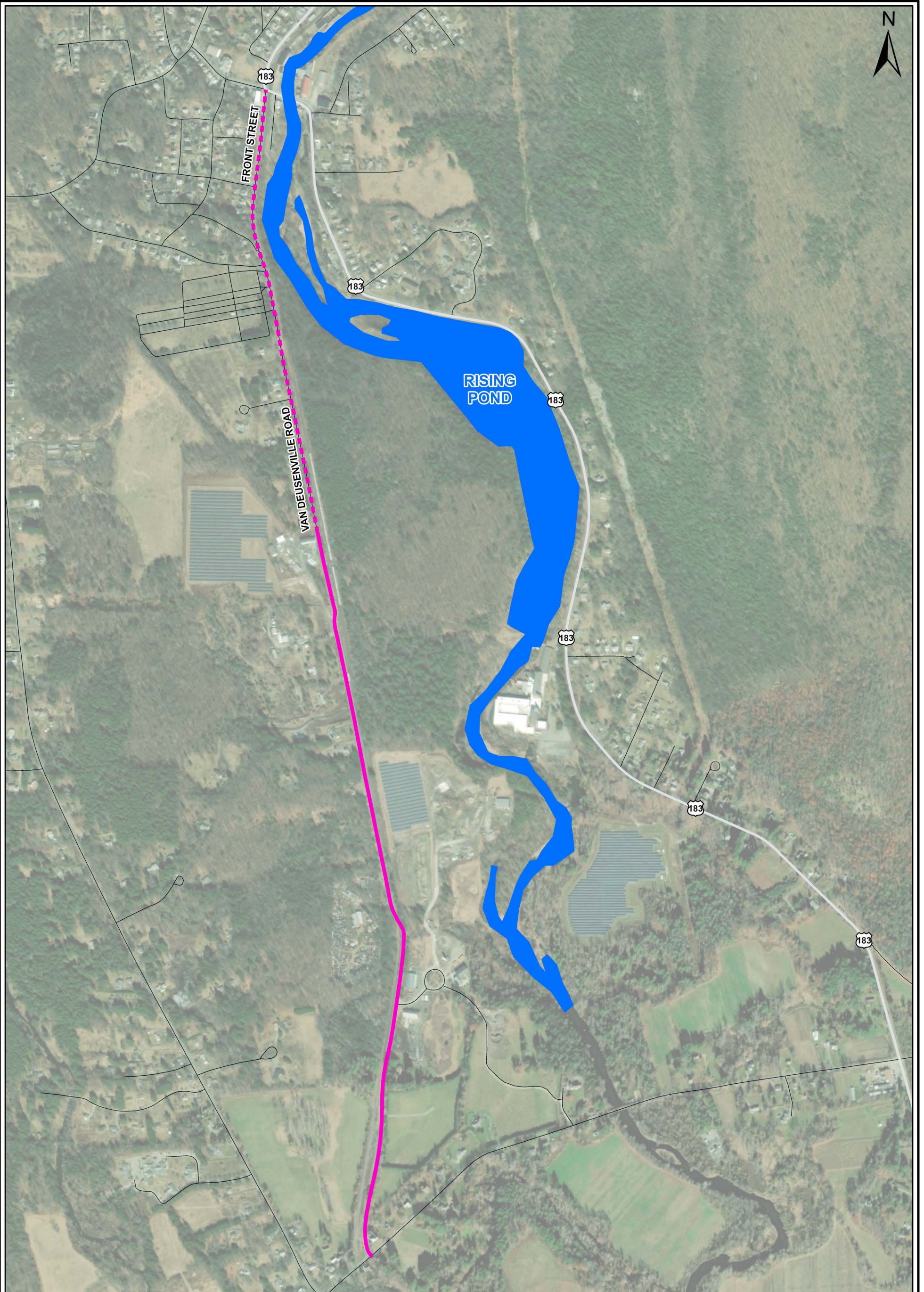
UDF OPERATIONAL AREA

GENERAL ELECTRIC COMPANY
HOUSATONIC RIVER - REST OF RIVER
ROAD ASSESSMENT WORK PLAN

ROUTES FIRST ASSOCIATED WITH REACH 5 CONSTRUCTION



FIGURE
3

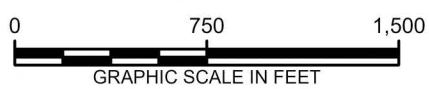


LEGEND

- ROAD
- HOUSATONIC RIVER
- ROUTE INCLUDED IN ASSESSMENT FOR BACKGROUND CONDITIONS ASSOCIATED WITH ROUTES FOR REACHES 7G AND 8 CONSTRUCTION
- ROUTE ASSOCIATED WITH REACHES 7G AND 8 CONSTRUCTION

NOTES:

1. COORDINATE SYSTEM: NAD83 STATE PLANE MASSACHUSETTS MAINLAND FIPS 2001
2. BASEMAP SOURCE: VIVID IMAGERY PROVIDED BY MAXAR, ACCESSED 6/25/2025
3. THE ROUTES INCLUDED IN THE ASSESSMENT MAY BE USED FOR THE TRANSPORTATION NOT ONLY OF REMOVED SEDIMENTS AND SOILS, BUT ALSO OF OTHER MATERIALS REQUIRED FOR REMEDIATION, INCLUDING CLEAN BACKFILL, CLEAN CAP MATERIAL, AND/OR EQUIPMENT.



GENERAL ELECTRIC COMPANY
HOUSATONIC RIVER - REST OF RIVER
ROAD ASSESSMENT WORK PLAN

**ROUTES ASSOCIATED WITH
REACHES 7G AND/OR 8 CONSTRUCTION**



FIGURE
4

Appendix A

Standard Operating Procedure: Continuous Road Monitoring Using Video Imaging

Standard Operating Procedure: Continuous Road Monitoring Using Video Imaging

Rev: 0 | Rev Date: June 2025

Scope and Application

This standard operating procedure describes procedures for conducting a continuous road monitoring survey using video imaging technology.

Equipment List

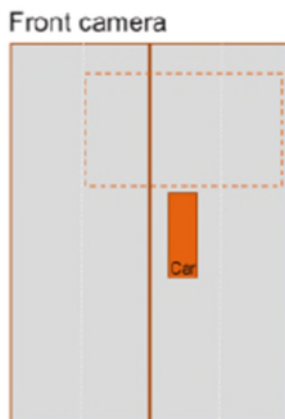
The following materials, as required, will be available during this procedure:

- GoPro Hero8 (or newer) video recorder, or equivalent, with the following minimum requirements:
 - Appropriate suction cup mounting device;
 - Global positioning system (GPS) capabilities; and
 - A minimum frame rate of 7 frames per second (FPS).
- Digital camera.

Procedure

The procedures are as follows:

1. Schedule road survey to avoid capturing data at night, or during periods of high glare (typically early morning or late afternoon) and to avoid capturing data while road is wet (or snow covered).
2. Before starting the survey, ensure the device is properly charged (and re-charged as necessary during collection) or directly connected to a power source.
3. Before starting the survey, ensure the device has proper available memory for job size.
4. Unless otherwise required by the work plan, video recorder configuration shall be a single forward-facing camera, as follows:



5. Based on road width and vehicle capabilities, select appropriate video recorder setup. Options include:
 - a. Mount video recorder on roof or hood of car – potential risk to lose/damage video recorder, particularly at high speeds.
 - b. Mount video recorder on inside of car on dash/windshield – less risk to lose/damage video recorder; however, there may be distortion of the images due to the view through the window and it may be difficult to get the required viewing angle.

6. Mount the video recorder using the appropriate suction cup mount and based on manufacturer recommendations.
7. Position video recorder on its mount so that it is orientated towards the road surface at approximately a 30° angle as measured down from the horizon. Ensure at least 50% of the video recorder view is of the road surface, thus minimizing obstruction by any portion of the vehicle the video recorder is mounted upon.
8. Enable the GPS such that captured video will be georeferenced. If GPS coverage is not available or reliable, maintain a field log to reference approximate mileage along the unpaved road where video is collected.
9. Turn on the video recorder and drive the assigned route at no more than 50 miles per hour. Images will be collected at least every 100 feet or more often as needed to sufficiently document areas with observed defects.
10. For infrastructure (e.g., culverts) adjacent to the road not captured in the view of the video recorder, stop and exit vehicle at the nearest available safe location, walk to such infrastructure, and collect images using a digital camera. Standardized photograph locations (with position and direction) will be established in the field to document the infrastructure. The standardized photo locations will be marked on a map and the approximate mileage along the unpaved road where images are collected will be noted in the field log.

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