HOUSATONIC REST OF RIVER MUNICIPAL COMMITTEE

March 18, 2022

Dean Tagliaferro, EPA Project Manager
GE-Pittsfield/Housatonic River Site
Boston, MA
Submitted via email to R1Housatonic@epa.gov

Re: Comments on the *Overall Strategy & Schedule for Implementation of the Corrective Measures*

Dear Mr. Tagliaferro:

The Housatonic Rest of River Municipal Committee (the Committee) respectfully submits the following comments on the *Overall Strategy & Schedule for Implementation of the Corrective Measures* (hereafter referred to as the OSS). The OSS provides a thorough summary of the schedule of deliverables. The Committee recognizes the need for significant schedule overlap to achieve project goals. However, there are certain occasions where the community may wish to participate actively with the understanding of forthcoming remedial design/remedial action (RD/RA) decisions. The Committee's comments below focus on opportunities for EPA and GE to communicate with the general public and ensuring that permit requirements are incorporated into the schedule adequately.

As per the Revised Final Permit requirements for the QOL Plan, GE is to "coordinate with local governments, affected residents and landowners at or near areas impacted by remediation". It will be essential to communicate with the public during construction to make people aware of ongoing project progress, next steps, and any issues or concerns that could affect their quality of life. The OSS briefly summarizes the approach to address the outreach and public participation requirements, but there is no defined schedule for the coordination of documents for public review. EPA should consider holding a series of public presentations or producing fact sheets that describe the rationale for RD/RA approaches in community-friendly language. This outreach will be an important component to ensuring a successful RoR project. Public

presentations and fact sheets will help the public understand how remedial actions and designs were chosen, based on the investigation report results. The approaches will also assist with enabling public input during the RD/RA process. The Committee would like to engage with EPA to offer the community opportunities to understand how remedial actions and designs were selected.

The Committee's comments on the *Overall Strategy & Schedule for Implementation of the Corrective Measures* are enclosed as Attachment A.

Sincerely,
The Housatonic Rest of River Municipal Committee

Enclosure: Attachment A - Housatonic Rest of River Municipal Committee Comments on GE's Overall Strategy & Schedule for Implementation of the Corrective Measures

Enclosure: Attachment B - Technical Assistance Services for Communities Comments, February 25, 2022

ATTACHMENT A
HOUSATONIC REST OF RIVER MUNICIPAL COMMITTEE
Comments on GE's *Overall Strategy & Schedule for Implementation of the Corrective Measures*
GE/Housatonic River - Rest of River

The *Overall Strategy & Schedule for Implementation of the Corrective Measures* (hereafter referred to as the OSS) provides a thorough summary of the schedule of deliverables. The schedule and sequence of documents in the OSS has been adjusted to meet project timelines. The Committee recognizes the need for significant schedule overlap to achieve project goals. However, there are certain occasions where the community may wish to participate actively with the understanding of forthcoming remedial design/remedial action (RD/RA) decisions. The Committee's comments focus on opportunities for EPA and GE to communicate with the general public and ensuring that permit requirements are incorporated into the schedule adequately.

The OSS briefly summarizes the approach to address the outreach and public participation requirements defined by the Revised Final Permit. There is no defined schedule for the coordination of documents for public review. There are a significant number of forthcoming reach-specific (and Upland Disposal Facility) summary reports, conceptual RD/RA work plans and final RD/RA work plans that are important for the community to be able to review. To assist with this substantial effort, EPA should consider holding a series of public presentations or producing fact sheets that describe the rationale for RD/RA approaches presented in the conceptual RD/RA work plans in community friendly language. These approaches will help the public understand how remedial actions and designs were chosen, based on the investigation report results. The approaches will also assist with enabling public input during the RD/RA process.

Components of each reach's pre-design, design and construction activities overlap in order to accomplish the significant amount of remedial actions to take place along the ROR corridor. This is necessary to avoid unacceptable lag times and inefficiencies in the proposed construction process. Since pre-design investigation work plans will not be based on sampling datasets that represents stable conditions, GE should rely on conservative assumptions of possible additional contaminant occurrence from upgradient remedial actions.

The Rest of River Committee offers the following general comments:

1. There is no mention of any deliverables anticipated during construction. As per the Revised Final Permit requirements for the QOL Plan, GE is to "coordinate with local governments, affected residents and landowners at or near areas impacted by remediation". It will be essential to communicate with the public during construction to make people aware of ongoing project progress, next steps, and any issues or concerns that could affect their

quality of life. This document should describe the anticipated deliverables to be provided to the community during construction in order to achieve Revised Final Permit requirements. Regular, detailed communications to local officials and residents during construction phase should be required. GE should propose, for EPA's approval, a continuous series of construction completion/status reports during the construction phase to keep the community apprised of the project's ongoing status.

2. The Revised Final Permit identifies several sitewide deliverables that are not acknowledged in this document. In addition, these deliverables are not described in the SOW. The documents include:
   - Restoration Corrective Measures Coordination Plan (RCMCP) (#12, pdf page 80).
   - Overall Cultural Resource Plan (#15, pdf page 80).
   - Institutional Controls and Related Requirements Plan (#20, pdf page 80).

   GE should clarify whether these deliverables are standalone requirements of the Revised Final Permit, or if they have been incorporated as part of other sitewide deliverables.

3. A requirement of conceptual RD/RA work plans is to describe "preliminary area-specific measures to address the QOL standards and potential impacts on the public". During the review of the June 2021 Revised Pre-Design Investigation Work Plan for Reach 5A Non-Residential Floodplain Exposure Areas, the city of Pittsfield identified a potential Frequently Used Subarea associated with Exposure Area 27 (EA 27). GE should clarify how new information will be used to ensure concerns are adequately addressed to meet the QOL standards and potential impacts on the public.

The Rest of River Committee highlights the following Sections:

1. Section 1.2 (pp 1-2) – The OSS states that the presented strategy and schedule are in accordance with the Final Revised Rest of River Statement of Work (SOW) and "subsequent communications with EPA". A summary or copies of correspondence should be appended to the final version of this document for future reference.

2. Section 3.1 (p 6) – The OSS states that "the remedial design and remedial action process is anticipated to take a number of years to complete", and Figure 3-1 provides a range of project phase timelines that will take up to 13 years to complete. Section 3.1 should be updated to provide a more definitive timeline of activities that follows the information provided in Figure 3-1 and describes the time required for each described phase of project activity accurately. These revisions should be subject to additional review and further comment.

3. Section 3.2 (pp 6-9) – The proposed schedule of activities recommends concurrent remediation of media (sediments, riverbanks and floodplain soils) so as to share

construction infrastructure (e.g., access roads and staging areas) to the extent feasible. In addition, remediation efforts are to begin at Reach 5A, the furthermost upgradient remediation unit. These are suitable and appropriate approaches. However, the amount of disturbance and possible release of contaminated media downgradient from construction activities is a concern. Given the significant amount of follow-on remediation activities, it would be prudent to establish effective best management practices to contain resuspended materials liberated during construction. As recommended by EPA's Contaminated Sediment Remediation Guidance for Hazardous Waste Sites, it is important to complete a pilot study of containment technologies to address resuspended contaminated materials. At a minimum EPA should require GE to follow the EPA's guidance on Contaminated Sediment Remediation.

4. Section 3.2 (p 7) - The OSS proposes to merge together Reaches 5C (flowing river and backwaters) and 6 (impounded Woods Pond) into one Remediation Unit because these reaches "will be removed and transported using a hydraulic dredging and/or hydraulic pumping approach (if feasible), with material from these areas pumped directly to the Upland Disposal Facility (UDF) or its support area for processing/dewatering." Employing the same method of sediment transport is not adequate justification for merging these river reaches that are hydrologically and ecologically different without some explanation of how habitat and water quality will be impacted, maintained or restored. Excavation and other construction activities will impact expansive aquatic, wetland, floodplain and upland habitats. The OSS does not provide detail with regard to how the schedule will allow for wildlife movement, migration and breeding. GE should be required to submit additional information regarding the justification for the merger of the two reaches and how excavation and other construction activities will be managed to minimize and mitigate impacts to the environment. EPA should carefully consider this proposed merger before approving it.

   In addition, the Revised Final Permit states that the implementation of the Corrective Measures shall begin concurrently in Reach 5A and Woods Pond, unless EPA approves a proposed alternate approach. The OSS does not provide a clear justification for why the proposed remediation efforts for Woods Pond are not concurrent, as required by the Revised Final Permit. The schedule for Woods Pond remediation units should occur concurrently with Reach 5A activities, as described in the Revised Final Permit.

5. Section 3.2 (pp 8-9) According to the OSS, excavation of sediment in Reach 7 "will commence following completion of sediment and soil excavation in the Reaches 5C/6 Remediation Unit and is anticipated to be performed concurrently with capping in that upstream reach (see Figure 3-1). Removal of the Columbia Mill Dam and the Former Eagle Mill Dam will commence following completion of sediment removal in these impoundments and may be performed concurrently with capping in the two impoundments where the dams will remain." Figure 3-1 (Planned Remediation Unit Sequencing) shows sediment

removal from impoundments behind the dams in Reach 7 commencing in Year 11 of the cleanup and dam removal commencing in Year 12 of the cleanup.

The 2014 Statement of Basis shows that the estimated timeline for the cleanup is 13 years, with removal of sediment behind the Columbia Mill Dam in Reach 7B as commencing in the third or fourth year of the cleanup and removal of sediment behind the Former Eagle Mill Dam in Reach 7C as commencing in the fourth year of the cleanup. The 2020 Statement of Basis states that the cleanup is still estimated to take 13 years to complete and that the "construction timeline did not change as a result of the changes outlined in the Draft Revised Permit." GE should provide an explanation and justification for why the OSS is inconsistent with timelines proposed in EPA's 2014 and 2020 Statements of Basis.

6. Section 4 (p 13) – The Quality of Life Compliance Plan (QOL Plan), a forthcoming sitewide deliverable, is scheduled to be produced prior to or concurrently with the Reach 5A Conceptual RD/RA Work Plan, and will be updated upon completion of the Reach 5A Final RD/RA Work Plan. Documenting the QOL Plan prior to the Reach 5A Conceptual RD/RA Work Plan is important because this deliverable addresses noise, air, odor and light standards for the remedial work, in addition to:
   - Cooperative work with the city of Pittsfield and other parties to facilitate their enhancement of recreation activities such as canoeing and other water activities, and hiking and bike trails in the ROR corridor.
   - Road use, including restrictions on transport of waste material through residential areas and methods to minimize and/or mitigate transportation-related impacts on neighborhoods.
   - Coordination with local governments, affected residents and landowners at or near areas affected by remediation to take reasonable steps to minimize the adverse impact of work activities.
   - Community health and safety.

   The Reach 5A QOL Plan should be developed prior to the Reach 5A Conceptual RD/RA Work Plan to allow for community input into the Work Plan.

7. Figures 5-1 and 5-2 – These figures within the OSS identify the deliverables requiring EPA approval. EPA is not required to be a part of the contractor procurement process. However, EPA should, at a minimum, review construction specifications provided as part of the construction contracts. These specifications should describe required special considerations such as the response and treatment of encountered cultural resources, artifacts, wetlands and areas of special interest (core area habitats). It is important that the construction response procedures are clearly described for the construction contractor to comply with project Applicable or Relevant and Appropriate Requirements (ARARs) associated with the National Historic Preservation Act and regulations (54 USC 300101 et seq. 36 CFR Part 80),

the Archaeological and Historic Preservation Act (54 USC 312501 et seq.), and the Massachusetts Clean Water Act – Water Quality Certification Regulations (314 CMR 9.00 et seq., including 9.06-9.07).

Technical Assistance Services *for* Communities
Comments on GE-Pittsfield/Housatonic River Site Overall Strategy and Schedule
February 25, 2022

Contract No.: 68HERH21A0018
Call Order Number.: 68HERH22F0082 (14.0.0 OSRTI – Regional & Headquarters TASC/CI Support)
Technical Direction: R1 2.2.14 GE Pittsfield

Technical Assistance Services for Communities (TASC)
Comments on GE-Pittsfield/Housatonic River Site
Overall Strategy and Schedule for Implementation of the Corrective Measures, January 2022

Introduction

This document provides TASC comments on the GE-Pittsfield/Housatonic River Site Overall Strategy and Schedule for Implementation of the Corrective Measures. It is for the city of Pittsfield, the Berkshire Regional Planning Commission (BRPC) and municipalities to use as they develop comments to share with the U.S. Environmental Protection Agency (EPA). TASC does not make comments directly to EPA on behalf of communities. This document is funded by EPA's TASC program. The contents do not necessarily reflect the policies, actions or positions of EPA.

Pursuant to the Revised Resource Conservation and Recovery Act (RCRA) Permit Modification (Revised Final Permit) issued by EPA to the General Electric Company (GE) on December 16, 2020, for the Rest of River (ROR) portion of the GE-Pittsfield/Housatonic River site, GE must develop and submit an Overall Strategy and Schedule (OSS) to present its overall strategy for implementing the ROR remedial action. Specifically, the submittal must address: 1) coordination of sediment, riverbank and floodplain remediation; b) sequence of remediation; c) GE's project management and organizational structure, including roles and responsibilities; and d) lines of communication among GE, EPA, and state and local entities.

Summary

The January 2022 OSS has six sections:

- Introduction.
- Project Management Structure and Communication.

- Approach to Implementation of Remedial Action.
- Updated Schedule of Deliverables.
- Workflow Prior to Start of Remediation.
- References.

Section 3.2 provides definitions of the remediation units, including the order in which they will be remediated, the type of remediation that will occur and timing for activities. Section 4 provides an updated schedule of ROR deliverables, including deliverables already submitted. Many of the deliverables are based on the completion or approval of other documents. Table 4-1 provides a summary of the schedule for the submittal of deliverables. Figure 5-1 provides a flow chart showing, in the upper portion, the planned sequence of deliverables and data collection activities necessary for the construction of the Upland Disposal Facility (which needs to be completed before remediation begins in Reach 5A). Figure 5-2 provides a flow chart showing the planned sequencing for Reach 5A pre-design and design deliverables and data collection activities necessary before the start of remediation activities in Reach 5A.

TASC Comments

The OSS provides a thorough summary of the schedule of deliverables. The schedule and sequence of documents in the OSS has been adjusted to meet project timelines. TASC recognizes the need for significant schedule overlap to achieve project goals. However, there are certain occasions where the community may wish to participate actively with the understanding of forthcoming remedial design/remedial action (RD/RA) decisions. TASC comments below focus on opportunities for EPA and the PRPs to communicate with the general public and ensuring that permit requirements are incorporated into the schedule adequately.

1. Section 1.2 of the OSS states that the presented strategy and schedule are in accordance with the Final Revised Rest of River Statement of Work (SOW) and "subsequent communications with EPA" (page 1, pdf page 7). It would be useful to include a summary or copies of correspondence with the final version of this document for future reference.

   The community may want to ask EPA if it is appropriate to include the communications with EPA that are applicable to the schedule presented in this document.

2. Section 3.1 of the OSS states that "the remedial design and remedial action process is anticipated to take a number of years to complete" (pdf page 12), and Figure 3-1 provides a range of project phase timelines that will take up to 13 years to complete (pdf page 26). It seems that Section 3.1 could be updated to provide a more definitive timeline of activities that follows the information provided in Figure 3-1.

   The community may want to ask EPA if the document should be revised to describe the time required for each described phase of project activity accurately.

3. As described in the OSS Section 3.2 (pdf page 12), the proposed scheduling of activities recommends concurrent remediation of media (sediments, riverbanks and floodplain soils) so as to share construction infrastructure (e.g., access roads and staging areas) to the extent feasible. In addition, remediation efforts are to begin at Reach 5A, the furthermost upgradient remediation unit. These are suitable and appropriate approaches. However, the amount of disturbance and possible release of contaminated media downgradient from construction activities is a possible concern. Given the significant amount of follow-on remediation activities, it would be prudent to establish effective best management practices to contain resuspended materials liberated during construction. As recommended by EPA's Contaminated Sediment Remediation Guidance for Hazardous Waste Sites, it is important to complete a pilot study of containment technologies to address resuspended contaminated materials.

   The community may want to ask if a pilot study evaluating suitable resuspended materials containment practices would be important to conduct as part of the Reach 5A RD/RA efforts (since it is the first reach to be remediated) and applied to the remediation of the other reaches.

4. To accomplish the significant amount of remedial actions to take place along the ROR corridor, components of each reach's pre-design, design and construction activities overlap. For instance (as summarized in Table 4-1, Pre-Design Reach 5C/6, pdf page 18), the Pre-Design Investigation Work Plan for Reaches 5C/6 will occur three years prior to anticipated completion of sediment/soil removal activities (not including capping) in Reach 5A. This indicates that the Reach 5C/6 Pre-Design Investigation Work Plan will be based on data gathered during Reach 5A remediation activities. Reach 5A remediation activities can resuspend contaminated media that could flow downgradient and affect Reach 5C/6. It would be best to complete the Reach 5C/6 Pre-Design Investigation Work Plan with a sampling dataset that represents stable conditions that would be established upon completion of Reach 5A remediation. However, this would introduce unacceptable lag times and efficiencies in the proposed construction process. Therefore, TASC recommends that all pre-design investigation work plans rely on conservative assumptions of possible additional contaminant occurrence from upgradient remedial actions.

   The community may want to ask EPA if the pre-design investigation work plans will incorporate conservative assumptions regarding possible contaminant transport from upgradient remediation activities.

5. The document briefly summarizes the approach to address the outreach and public participation requirements defined by the Revised Final Permit. There is no defined schedule for the coordination of documents for public review. There are a significant number of forthcoming reach-specific (and Upland Disposal Facility) summary reports, conceptual RD/RA work plans and final RD/RA work plans that are important for the community to be able to review. To assist with this substantial effort, TASC recommends holding a series of public presentations or producing fact sheets that summarize the

predesign investigation findings that lead to RD/RA development in community friendly language (if the community is interested). These approaches will help the public understand how remedial actions and designs were chosen, based on the investigation report results. The approaches will also assist with enabling public input during the RD/RA process.

If interested, the community may want to ask EPA to plan for a series of public presentations or fact sheets produced by GE that describes the rationale for RD/RA approaches presented in the conceptual RD/RA work plans.

6. The Revised Final Permit states that "implementation of the Corrective Measures shall begin concurrently, if feasible. Permittee shall begin such concurrent implementation in Reach 5A and Woods Pond, unless Permittee proposes, and EPA approves an alternate approach" (Subsection I. Schedule, second paragraph, page 76, pdf page 81). The document does describe reaches 5C/6 (Woods Pond) as occurring during the same time as 5A remedy actions. However, the OSS does not provide a clear justification for why the proposed remediation efforts for Woods Pond are not concurrent, as required by the Revised Final Permit.

   The community may want to ask EPA why the schedule for Woods Pond remediation units is not planned to occur concurrently with Reach 5A activities, as described in the Revised Final Permit.

7. The Quality of Life Compliance Plan (QOL Plan), a forthcoming sitewide deliverable, is scheduled to be produced prior to or concurrently with the Reach 5A Conceptual RD/RA Work Plan (Footnote #3, Table 5-1, pdf page 28 | September 16, 2023, per Table 4-1, pdf page 18), and will be updated upon completion of the Reach 5A Final RD/RA Work Plan. Documenting the QOL Plan prior to the Reach 5A Conceptual RD/RA Work Plan is important because this deliverable addresses noise, air, odor and light standards for the remedial work, in addition to:
   - Cooperative work with the city of Pittsfield and other parties to facilitate their enhancement of recreation activities such as canoeing and other water activities, and hiking and bike trails in the ROR corridor.
   - Road use, including restrictions on transport of waste material through residential areas and methods to minimize and/or mitigate transportation-related impacts on neighborhoods.
   - Coordination with local governments, affected residents and landowners at or near areas affected by remediation to take reasonable steps to minimize the adverse impact of work activities.
   - Community health and safety.

   To capture community concerns and requests for standards associated with a proposed RD/RA proactively, the QOL Plan should be documented in the near future.

The community may want to ask EPA if it would be appropriate to begin the development of the QOL Work Plan in the near future, to allow for community input into the Reach 5A Conceptual RD/RA Work Plan.

8. A requirement of conceptual RD/RA work plans is to describe "preliminary area-specific measures to address the QOL standards and potential impacts on the public" (SOW, eighth bullet statement, pdf page 63). The need for proactive community coordination prior to Reach 5A RA/RD is emphasized by the fact that during the review of the June 2021 Revised Pre-Design Investigation Work Plan for Reach 5A Non-Residential Floodplain Exposure Areas, the city of Pittsfield identified a potential Frequently Used Subarea associated with Exposure Area 27 (EA 27). Currently, the Revised Final Permit identifies suitable exposure scenario basis performance standards to address "General Recreation, adult (high use)" (Table 1, pdf page 86 of the permit), which correlate to polychlorinated biphenyl (PCB) numeric performance standards of 14 milligrams per kilogram (mg/kg) and 27 mg/kg for floodplain soil. Given the future anticipated use of EA 27, a more suitable exposure scenario of "General Recreation, young child (high use)" with a PCB performance standard of 4.6 mg/kg for floodplain soil may be appropriate. Considering these concerns prior to the development of the Reach 5A RD/RA is important.

   The community may want to ask EPA if the community's anticipated uses for EA 27 will be addressed adequately as part of the forthcoming Reach 5A RD/RA effort.

9. The Revised Final Permit identifies several sitewide deliverables that are not acknowledged in this document. In addition, these deliverables are not described in the SOW. The documents include:
   1. Restoration Corrective Measures Coordination Plan (RCMCP) (#12, pdf page 80).
   2. Overall Cultural Resource Plan (#15, pdf page 80).
   3. Institutional Controls and Related Requirements Plan (#20, pdf page 80).

   The community may want to ask if these deliverables are requirements of the Revised Final Permit, or if they have been incorporated as part of other sitewide deliverables.

10. The document does a thorough job of describing deliverables associated with pre-design, design and post-construction activities. However, there is no mention of any deliverables anticipated during construction. As per the Revised Final Permit requirements for the QOL Plan (pdf pages 79-80), GE is to "coordinate with local governments, affected residents and landowners at or near areas impacted by remediation to take reasonable steps to minimize the adverse impact of work activities…and to address community health and safety, with the maintenance of a website to provide community access to information such as data, technical reports, work plans and project fact sheets as well as updates on current and future project activities, and shall establish and maintain a system to identify and address community complaints and concerns during construction activities." It will be essential to communicate with the public during construction to make people aware of ongoing project progress, next steps, and any issues or concerns

that could affect their quality of life. This document should describe the anticipated deliverables to be provided to the community during construction in order to achieve Revised Final Permit requirements.

The community may want to ask EPA if GE can propose a continuous series of construction completion/status reports during the construction phase to keep the community apprised of the project's ongoing status.

11. Figures 5-1 and 5-2 of the OSS (pdf pages 27 and 28) identify the deliverables requiring EPA approval. EPA is not required to be a part of the contractor procurement process. However, TASC recommends that EPA review construction specifications provided as part of the construction contracts. These specifications should describe required special considerations such as the response and treatment of encountered cultural resources, artifacts, wetlands and areas of special interest (core area habitats). It is important that the construction response procedures are clearly described for the construction contractor to comply with project Applicable or Relevant and Appropriate Requirements (ARARs) associated with the National Historic Preservation Act and regulations (54 USC 300101 et seq. 36 CFR Part 80), the Archaeological and Historic Preservation Act (54 USC 312501 et seq.), and the Massachusetts Clean Water Act – Water Quality Certification Regulations (314 CMR 9.00 et seq., including 9.06-9.07).

    The community may want to ask if EPA is going to review construction specifications prior to contract awards in order to ensure ARAR compliance during construction.

References Cited

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

EPA. Office of Solid Waste and Emergency Response. Contaminated Sediment Remediation Guidance for Hazardous Waste Sites. EPA-540-R-05-012. December 2005. https://clu-in.org/download/contaminantfocus/sediments/epa-contaminated-sed-remediation-guidance.pdf.

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

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