

2. Removal Action Objectives, Performance Standards, and Applicable or Relevant and Appropriate Requirements

2.1 Removal Action Objectives

USEPA's removal action objectives (RAOs) for the ½-Mile Reach of the Housatonic River have been provided to GE. While GE does not necessarily agree that these are the appropriate RAOs for the Removal Action, USEPA's RAOs are as follows:

- Mitigate the potential human health and environmental threat posed by the existing levels of PCBs in river sediments, and bank and floodplain soils;
- Minimize the potential for recontamination of previously remediated floodplain properties and further contamination of other floodplain areas;
- Minimize the potential for the downstream migration of contaminated sediments and banks soils; and
- Eliminate or mitigate existing sources of contamination to the upper ½-Mile Reach of the Housatonic River (this objective also applies to various other source control measures being undertaken by GE separately from this Removal Action).

Although GE does not necessarily accept these objectives, the "Trustees" objectives are as follows:

1. Implement the Removal Action for this reach as conditionally approved by USEPA;
2. Perform the restoration, including the enhancement of the river sediment and bank habitat as agreed to between GE, the Trustees, USEPA, the Commonwealth of Massachusetts, and the State of Connecticut, to increase the diversity and productivity of the biological community in this reach;
3. Restore the river bank to provide overlying cover as agreed to by GE, the Trustees, USEPA, the Commonwealth of Massachusetts, and the State of Connecticut and to enhance the bank vegetation by reestablishing plantings using native species; and
4. Minimize the potential for erosion of residual PCB-containing bank soils and river sediments which would result in recontamination of river sediments or transport of PCBs, and which could impair the river restoration by adversely impacting the ecological receptors.

As discussed previously in Section 1, the work described herein will result in a substantial reduction in PCB levels in the sediments and bank soils for this reach of the River. Following implementation of the sediment removal, replacement, and restoration activities, the sediment with the highest PCB concentrations will be removed and the PCB concentrations in the top foot will be reduced to less than 1 ppm. Further, the proposed sediment-related activities will effectively isolate the remaining PCB-containing sediment and minimize the potential for resuspension of sediments into the water column and for direct contact of humans and biological receptors to the sediment.

For the bank soils, following implementation of the bank soil removal and restoration activities, the bank soils with the highest PCB concentrations will be removed. As agreed, the spatial average PCB concentrations will be reduced to under 10 ppm and under 15 ppm in the top foot and 1- to 3-foot depth intervals, respectively, both in the overall ½-Mile Reach and in the specific averaging areas identified in the USEPA's letter of December 1, 1998. Further, the PCBs

United States et al. v. General Electric Company (D. Mass.)

Appendix F to Consent Decree

***Removal Action Work Plan
for Upper 1/2 Mile Reach of
Housatonic River, dated
August 1999, and EPA
approval letter dated
August 5, 1999***

Pittsfield/Housatonic River Site
General Electric Company
Pittsfield, Massachusetts

October 1999

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