

Proposed Action

The Proposed Action consists of the excavation and disposal of approximately 95,000 cubic yards of contaminated sediment and riverbank soil. The excavated areas will be backfilled with clean material. The remediation will consist of Sheetpiling and Pump Bypass (modified Base Alternative 2 of the EE/CA). Disposal will consist of consolidation of 50,000 cubic yards of contaminated soil and sediment at the GE On Plant Consolidation Areas ("OPCAs"), which were approved pursuant to EPA's August 4, 1999 Action Memorandum, with off-site disposal of the excess material (Option A). The Proposed Action was chosen based on what the Region believes to be the most effective and efficient approach to remediation in the 1 ½ Mile Reach based on existing data. In addition to the Proposed Action, an excavation alternative is also recommended for the lower stretch of river below approximately Transect 168: pump bypass. The excavation alternative will allow EPA the flexibility to adjust field operations to take advantage of its contractor's capabilities and experiences as well as experiences gained in observing the removal action in the Upper ½ Mile Reach currently being performed by GE. The excavation alternative would be implemented in the instance where the contractor can show, after EPA approval, that the alternate excavation method is a more effective and efficient approach to remediation. In addition to the proposed excavation activities, the Proposed Action also includes activities to minimize potential contaminant migration into the river from surface water run-off, drainage swale erosion and riverbank erosion. These activities include, but are not limited to, the construction of settling basins, overflow weirs and the lining of drainage swales with rip rap.

The Proposed Action is a modified version of Base Alternative 2. Beginning at the Lyman Street Bridge, sheetpiling will be installed in the river to prevent water flow to the areas/cells to be excavated from Transect 64 and continuing downstream to approximately Transect 96 (Figure 2). Since sheeting cannot be installed under the Lyman Street Bridge, wet excavation, with in-stream diversion, is proposed only for excavation under the bridge. Sheetpiling is proposed for this section primarily because the river abuts Oxbows A, B and C. These Oxbows were filled with material, some of which came from GE, and are contaminated with PCBs. (GE is required under the Consent Decree to further characterize the extent of contamination in these Oxbows.) The Region believes that sheetpiling will provide better excavation control in the smaller cells if an isolated pocket of Non-Aqueous Phase Liquid ("NAPL") is found in this portion of the river.

Pump bypass will be used from approximately Transect 96 to approximately Transect 168, because it is the alternative that best accommodates the difficult conditions of this portion of the 1 ½ Mile Reach. From approximately Transect 96 down to the Elm Street Bridge, the eastern banks are very high and steep. Access along this bank is also limited due to the homes and businesses making it virtually impossible to install sheetpiling or excavate from the top of bank on this side. Although the bank on the west side of the river is lower with a more moderate slope, installation of sheetpiling on the west side will greatly impact an existing business (supermarket). Bedrock below the river bed also appears to be rising toward the surface in this section of the river which further complicates the use of sheetpiling. The section of river below the Elm Street Bridge to about Transect 154 is characterized by the abundant cobbles that cover

Site: GE-004
Break: 2.9
Other: 9483

United States Environmental Protection Agency
New England
Office of Site Remediation and Restoration
One Congress Street, Suite 1100, Boston, Massachusetts 02114-2023

Enforcement-Sensitive Information Attached

Memorandum

Date: November 21, 2000

Subject: Request for Removal Action Housatonic River 1 ½-Mile Reach at the GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts—**Action Memorandum and Exemption from the Statutory \$2,000,000 and 12-Month Limits on Removal Actions**

From: Chester Janowski, Remedial Project Manager *CJ*
Office of Site Remediation and Restoration

Through: Patricia L. Meaney, Director *plm*
Office of Site Remediation and Restoration

To: Mindy S. Lubber
Regional Administrator

I. Purpose

The purpose of this Action Memorandum is to request and document approval for the proposed removal action described herein for a 1 ½-mile portion of the Housatonic River at the GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts. The proposed removal action will mitigate the human health and environmental threats posed by the existing levels of polychlorinated biphenyls (“PCBs”) and other hazardous substances in this 1 ½ mile portion of the river. This Action Memorandum also requests and documents the approval of a “consistency” exemption from the \$2 million and 12-month statutory limits for removal actions under the National Contingency Plan.

This Action Memorandum concerns the 1 ½ mile section of the East Branch of the Housatonic River and its riverbanks from Lyman Street, Pittsfield, Massachusetts to the confluence with the West Branch of the Housatonic River and is referred to in this Memorandum as the “1 ½ Mile Reach.” The 1 ½ Mile Reach does not include the actual/potential lawns and other non-riverbank portions of the floodplain properties adjacent to this Reach. As discussed below, EPA and GE will jointly finance, and EPA will perform, the required removal action activities for the sediments and riverbanks in the 1 ½ Mile Reach. GE will conduct the required removal actions on the non-bank portions of the properties adjacent to the 1 ½ Mile Reach.

9483