

Draft

Final Third Five-Year Review Report for the Hudson River PCBs Superfund Site

APPENDIX 6 FIVE-YEAR REVIEW SITE INSPECTION CHECKLIST

Prepared by:

USEPA

July 2024

Draft

**Final Third Five-Year Review Report for the
Hudson River PCBs Superfund Site**

**APPENDIX 6-1
FIVE-YEAR REVIEW SITE INSPECTION
CHECKLIST
OU1**

Prepared by:

USEPA

July 2024

Five-Year Review Site Inspection Checklist – OU1

I. SITE INFORMATION													
Site name: Hudson River PCBs Superfund Site, OU1: Remnant Deposit Sites	Date of inspection: August 30, 2022												
Location and Region: New York, Hudson Falls and Fort Edward	EPA ID: NYD980763841												
Agency, office, or company leading the five-year review: EPA Region 2	Weather/temperature: Partly cloudy; 80° F												
Remedy Includes: (Check all that apply) <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;"><input checked="" type="checkbox"/> Landfill cover/containment</td> <td style="width: 50%;"><input type="checkbox"/> Monitored natural attenuation/recovery</td> </tr> <tr> <td><input checked="" type="checkbox"/> Access controls</td> <td><input type="checkbox"/> Groundwater containment</td> </tr> <tr> <td><input type="checkbox"/> Institutional controls</td> <td><input type="checkbox"/> Vertical barrier walls</td> </tr> <tr> <td><input type="checkbox"/> Groundwater pump and treatment</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Surface water collection and treatment</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Other:</td> <td></td> </tr> </table>		<input checked="" type="checkbox"/> Landfill cover/containment	<input type="checkbox"/> Monitored natural attenuation/recovery	<input checked="" type="checkbox"/> Access controls	<input type="checkbox"/> Groundwater containment	<input type="checkbox"/> Institutional controls	<input type="checkbox"/> Vertical barrier walls	<input type="checkbox"/> Groundwater pump and treatment		<input type="checkbox"/> Surface water collection and treatment		<input type="checkbox"/> Other:	
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<input checked="" type="checkbox"/> Access controls	<input type="checkbox"/> Groundwater containment												
<input type="checkbox"/> Institutional controls	<input type="checkbox"/> Vertical barrier walls												
<input type="checkbox"/> Groundwater pump and treatment													
<input type="checkbox"/> Surface water collection and treatment													
<input type="checkbox"/> Other:													
Attachments: <input checked="" type="checkbox"/> Inspection team roster attached <input checked="" type="checkbox"/> Site map attached													
II. INTERVIEWS (Not Applicable - See Part 4 Other Interviews)													
1. System Operations Site Manager													
<table style="width: 100%; border: none;"> <tr> <td style="width: 33%; text-align: center;">Name _____</td> <td style="width: 33%; text-align: center;">Title _____</td> <td style="width: 33%; text-align: center;">Date _____</td> </tr> <tr> <td colspan="3">Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone Phone no. _____</td> </tr> <tr> <td colspan="3">Problems, suggestions; <input type="checkbox"/> Report attached _____</td> </tr> </table>		Name _____	Title _____	Date _____	Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone Phone no. _____			Problems, suggestions; <input type="checkbox"/> Report attached _____					
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Problems, suggestions; <input type="checkbox"/> Report attached _____													
2. System Operations Staff													
<table style="width: 100%; border: none;"> <tr> <td style="width: 33%; text-align: center;">Name _____</td> <td style="width: 33%; text-align: center;">Title _____</td> <td style="width: 33%; text-align: center;">Date _____</td> </tr> <tr> <td colspan="3">Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone Phone no. _____</td> </tr> <tr> <td colspan="3">Problems, suggestions; <input type="checkbox"/> Report attached _____</td> </tr> </table>		Name _____	Title _____	Date _____	Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone Phone no. _____			Problems, suggestions; <input type="checkbox"/> Report attached _____					
Name _____	Title _____	Date _____											
Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone Phone no. _____													
Problems, suggestions; <input type="checkbox"/> Report attached _____													

4.	Permits and Service Agreements	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	<input type="checkbox"/> Air discharge permit	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	<input type="checkbox"/> Effluent discharge	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	<input type="checkbox"/> Waste disposal, POTW	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	<input type="checkbox"/> Other permits: _____	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
Remarks: _____				
6.	Discharge Compliance Records	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	<input type="checkbox"/> Air	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	<input type="checkbox"/> Water (effluent)	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
Remarks: _____				
7.	Daily Access/Security Logs	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
Remarks: <u>Access is controlled and restricted with fences surrounding deposits.</u>				

IV. SYSTEM OPERATIONS COSTS

1.	System Operations Organization	<input type="checkbox"/> Contractor for State	<input type="checkbox"/> Contractor for PRP	
	<input type="checkbox"/> State in-house	<input type="checkbox"/> Contractor for State	<input checked="" type="checkbox"/> Contractor for PRP	
	<input checked="" type="checkbox"/> PRP in-house	<input checked="" type="checkbox"/> Contractor for PRP		
	<input type="checkbox"/> Federal Facility in-house	<input type="checkbox"/> Contractor for Federal Facility		
	<input type="checkbox"/> Other			
Remarks: <u>OM&M is performed by GE and overseen by EPA.</u>				
2.	System Operations Cost Records	<input checked="" type="checkbox"/> N/A	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date
<input checked="" type="checkbox"/> Funding mechanism/agreement in place (GE performing remedy, including O&M, pursuant to 1990 consent decree with the United States)				
Original System Operations cost estimate _____		<input type="checkbox"/> Breakdown attached		
Total annual cost by year for review period if available				
From _____	To _____	_____	<input type="checkbox"/> Breakdown attached	
Date	Date	Total cost		
From _____	To _____	_____	<input type="checkbox"/> Breakdown attached	
Date	Date	Total cost		
From _____	To _____	_____	<input type="checkbox"/> Breakdown attached	
Date	Date	Total cost		
From _____	To _____	_____	<input type="checkbox"/> Breakdown attached	
Date	Date	Total cost		
From _____	To _____	_____	<input type="checkbox"/> Breakdown attached	
Date	Date	Total cost		

V. ACCESS AND INSTITUTIONAL CONTROLS Applicable N/A

A. Fencing				
1.	Fencing damaged	<input type="checkbox"/> Location shown on site map	<input type="checkbox"/> Gates secured	<input checked="" type="checkbox"/> N/A
Remarks: <u>Fencing is inspected in the fall and spring of each year; any damage is quickly repaired.</u>				
B. Other Access Restrictions				

1. **Signs and other security measures** Location shown on site map N/A
 Remarks: OUI remnant deposit signs were inspected on August 30, 2022 and were satisfactory. These signs are inspected regularly twice a year and replaced as needed.

C. Institutional Controls (ICs)

1. **Implementation and enforcement**
 Remarks: The ROD did not identify institutional controls for the remnant deposits. However, EPA has identified institutional controls that should be implemented to restrict future use of the remnant properties to uses and activities that would not compromise the integrity of the cap system or result in unacceptable risks of exposures to contaminants. EPA, New York State, and GE are researching ownership of the remnant sites so that an appropriate institutional control can be implemented.

2. **Adequacy** ICs are adequate ICs are inadequate N/A
 Remarks: See Above.

D. General

1. **Vandalism/trespassing** Location shown on site map No vandalism evident
 Remarks: No vandalism observed during the inspection. The sites are inspected a minimum of twice a year and evidence of trespassing and vandalism are documented. It is common to find evidence of trespassing (i.e., four-wheeler ruts) but these unauthorized activities have not impacted the integrity of the cap. Ruts have been filled. Signage and fences are inspected and repaired as needed to limit trespassing to the extent practicable.

2. **Land use changes on site**
 Remarks: None.

3. **Land use changes off site**
 Remarks: None.

VI. GENERAL SITE CONDITIONS

A. Roads Applicable N/A

1. **Roads damaged** Location shown on site map Roads adequate N/A
 Remarks: No issues observed, roads are repaired on an as-needed basis to provide access to the Sites.

B. Other Site Conditions
 Remarks: A downed tree from a landslide was observed on the land-side edge of the cap for Remnant Deposit 2. The tree was subsequently removed, and GE reported no significant damage to the cap.

Inspection Roster	
Organization	Name
EPA	Michael Cheplowitz
EPA	Matt Wiener
Arcadis on behalf of General Electric	Zachary Evans

VII. OVERALL OBSERVATIONS	
A.	Implementation of the Remedy
	<p>Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).</p> <p><u>Remarks: The remedy currently protects human health and the environment as the in-place containment and cap system prevents human exposure, and perimeter fencing and signage continue to be maintained. However, in order for the remedy to be protective in the long-term, an institutional control needs to be implemented to ensure that future use of remnant deposits does not compromise the integrity of the cap system or result in unsafe exposures. Containment of contaminated sediments is functioning as expected.</u></p>
B.	Adequacy of System Operations
	<p>Remarks: <u>None.</u></p> <p>Describe issues and observations related to the implementation and scope of System Operation procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.</p> <p>Remarks: <u>None.</u></p>
C.	Early Indicators of Potential Remedy Problems
	<p>Describe issues and observations such as unexpected changes in the cost or scope of System Operations or a high frequency of unscheduled repairs that suggest that the protectiveness of the remedy may be compromised in the future.</p> <p><u>Remarks: N/A</u></p>
D.	Opportunities for Optimization
	<p>Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.</p> <p><u>Remarks: The remnant deposits have typically been mowed twice per year, once in the spring and once in the fall. There may be advantages to only mowing once per year that include increased habitat for wildlife and potential to reduce costs and emissions associated with mowing. EPA and GE will discuss if this is practical, as an annual mowing is more difficult to complete and may not be practical. NYSDEC is supportive of reducing the mowing to once per year.</u></p>

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OU1**

**ATTACHMENT A
INSPECTION PHOTO LOG**

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July 2024



Photo 1. Remnant Deposit 1 (island and nearby shallows).



Photo 2. Remnant Deposit 2 with a fallen tree in the background.



Photo 3. Remnant Deposit 2 (facing northwest from Remnant Deposit 3).



Photo 4. Remnant Deposit 3 (facing north).



Photo 5. Remnant Deposit 3 (facing south).

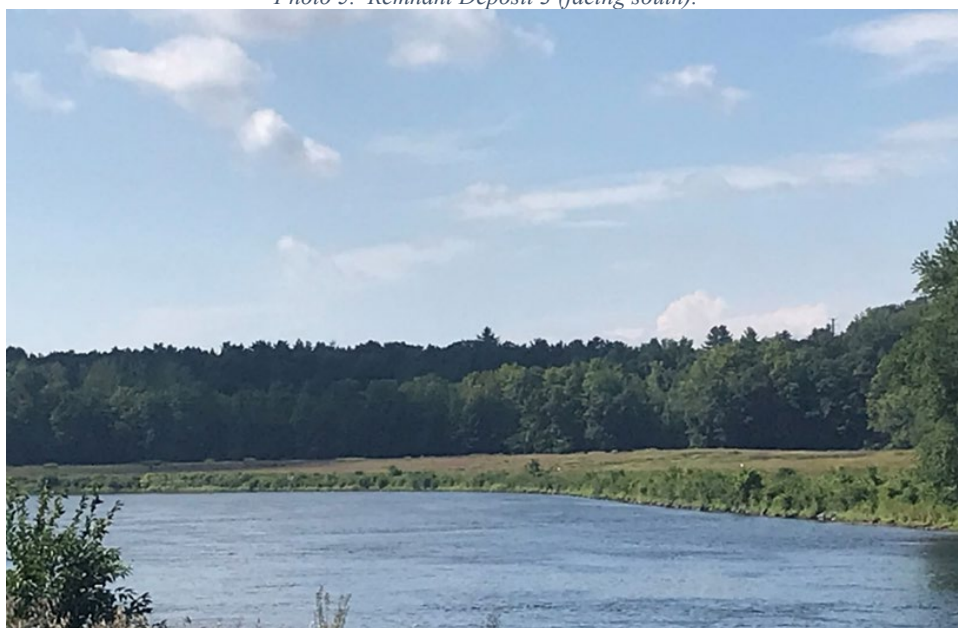


Photo 6. Remnant Deposit 4 (facing southwest from Remnant Deposit 3).



Photo 7. Remnant Deposit 4.



Photo 8. Remnant Deposit 4 (facing south).



Photo 9. Remnant Deposit 5 (facing northeast from Rogers Island).

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**Final Third Five-Year Review Report for the
Hudson River PCBs Superfund Site**

APPENDIX 6-2

**FIVE-YEAR REVIEW SITE INSPECTION
CHECKLIST
OU2**

Prepared by:

USEPA

July 2024

Five-Year Review Site Inspection Checklist – OU2

I. SITE INFORMATION										
Site name: Hudson River PCBs Superfund Site	Date of inspection: 10/5/2022									
Location and Region: New York, Hudson Falls to Battery in NYC	EPA ID: NYD980763841									
Agency, office, or company leading the five-year review: EPA Region 2	Weather/temperature: 70°F, cloudy with scattered/light rain									
Remedy Includes: (Check all that apply) <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"> <input checked="" type="checkbox"/> Landfill cover/containment (in-river caps) <input type="checkbox"/> Access controls <input checked="" type="checkbox"/> Institutional controls <input type="checkbox"/> Groundwater pump and treatment <input type="checkbox"/> Surface water collection and treatment <input checked="" type="checkbox"/> Other: <u>Dredging of contaminated sediments</u> </td> <td style="width: 50%; vertical-align: top;"> <input checked="" type="checkbox"/> Monitored natural attenuation/recovery <input type="checkbox"/> Groundwater containment <input type="checkbox"/> Vertical barrier walls </td> </tr> </table>		<input checked="" type="checkbox"/> Landfill cover/containment (in-river caps) <input type="checkbox"/> Access controls <input checked="" type="checkbox"/> Institutional controls <input type="checkbox"/> Groundwater pump and treatment <input type="checkbox"/> Surface water collection and treatment <input checked="" type="checkbox"/> Other: <u>Dredging of contaminated sediments</u>	<input checked="" type="checkbox"/> Monitored natural attenuation/recovery <input type="checkbox"/> Groundwater containment <input type="checkbox"/> Vertical barrier walls							
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Attachments: <input checked="" type="checkbox"/> Inspection team roster attached <input type="checkbox"/> Site map attached										
II. INTERVIEWS (Not Applicable - See Part 4 Other Interviews)										
1. System Operations site manager <table style="width: 100%; border: none;"> <tr> <td style="width: 33%;">Name _____</td> <td style="width: 33%;">Title _____</td> <td style="width: 33%;">Date _____</td> </tr> <tr> <td colspan="3">Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone Phone no. _____</td> </tr> <tr> <td colspan="3">Problems, suggestions; <input type="checkbox"/> Report attached _____</td> </tr> </table>		Name _____	Title _____	Date _____	Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone Phone no. _____			Problems, suggestions; <input type="checkbox"/> Report attached _____		
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Problems, suggestions; <input type="checkbox"/> Report attached _____										
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Name _____	Title _____	Date _____								
Interviewed <input type="checkbox"/> at site <input type="checkbox"/> at office <input type="checkbox"/> by phone Phone no. _____										
Problems, suggestions; <input type="checkbox"/> Report attached _____										

3. **Local regulatory authorities and response agencies** (i.e., State and Tribal offices, emergency response office, police department, office of public health or environmental health, zoning office, recorder of deeds, or other city and county offices, etc.) Fill in all that apply.

Agency _____
Contact _____
Name Title Date Phone no.
Problems; suggestions; Report attached _____

Agency _____
Contact _____
Name Title Date Phone no.
Problems; suggestions; Report attached _____

Agency _____
Contact _____
Name Title Date Phone no.
Problems; suggestions; Report attached _____

Agency _____
Contact _____
Name Title Date Phone no.
Problems; suggestions; Report attached _____

4. **Other interviews** (optional) Report attached.

Meetings between EPA and GE have occurred on a regular basis over the past five years, EPA oversees GEs work and interacts with GEs contractors during work.

III. ON-SITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)

1. System Operations Documents
- | | | | |
|---|---|-------------------------------------|------------------------------|
| <input checked="" type="checkbox"/> System Operations manual(s) | <input checked="" type="checkbox"/> Readily available | <input type="checkbox"/> Up to date | <input type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> As-built drawings | <input checked="" type="checkbox"/> Readily available | <input type="checkbox"/> Up to date | <input type="checkbox"/> N/A |
| <input checked="" type="checkbox"/> Maintenance logs | <input checked="" type="checkbox"/> Readily available | <input type="checkbox"/> Up to date | <input type="checkbox"/> N/A |

Remarks: Documents produced by GE and its contractors are provided to EPA and are kept at the EPA field office located at 187 Wolf Road, Albany, New York. Electronic records are also kept and stored by EPA. In 2021 EPA began the process of optimizing the OM&M work, the optimized program is being documented in the long-term OM&M work plan.

2.	Site-Specific Health and Safety Plan	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	<input type="checkbox"/> Contingency plan/emergency response plan	<input checked="" type="checkbox"/> Readily available	<input checked="" type="checkbox"/> Up to date	<input type="checkbox"/> N/A
	Remarks: Community Health and Safety Plan was also in place.			
3.	System Operations and OSHA Training Records	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	Remarks: _____			
4.	Permits and Service Agreements			
	<input type="checkbox"/> Air discharge permit	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	<input type="checkbox"/> Effluent discharge	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	<input type="checkbox"/> Waste disposal, POTW	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	<input type="checkbox"/> Other permits:	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	Remarks: _____			
6.	Discharge Compliance Records			
	<input type="checkbox"/> Air	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	<input type="checkbox"/> Water (effluent)	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	Remarks: _____			
7.	Daily Access/Security Logs	<input type="checkbox"/> Readily available	<input type="checkbox"/> Up to date	<input checked="" type="checkbox"/> N/A
	Remarks: _____			

IV. SYSTEM OPERATIONS COSTS	
1.	System Operations Organization <input type="checkbox"/> State in-house <input type="checkbox"/> Contractor for State <input checked="" type="checkbox"/> PRP in-house <input checked="" type="checkbox"/> Contractor for PRP <input type="checkbox"/> Federal Facility in-house <input type="checkbox"/> Contractor for Federal Facility <input type="checkbox"/> Other Remarks: <u>Handled by GE and their contractors.</u>

1.	Implementation and enforcement	
	Site conditions imply ICs not properly implemented	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
	Site conditions imply ICs not being fully enforced	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
	Type of monitoring (e.g., self-reporting, drive by) <u>Drive-by</u>	
	Enforcement: <u>Fishing license and/or enrollment in the recreational marine fishing registry required to fish in the Hudson River. New York State Department of Health (NYSDOH) issues fish advisories and New York State Department of Environmental Conservation (NYSDEC) issues regulations for fishing in the Hudson River.</u>	
	Frequency: <u>Continuous</u>	
	Responsible party/agency: <u>EPA, NYSDOH and NYSDEC.</u>	
	Contact: <u>Bridget Boyd</u>	<u>NYSDOH Public Health Specialist</u> (518) 402-7860
	<u>David Tromp</u>	<u>NYSDEC Section Chief</u> (518) 764-2401
	Name	Title
	Reporting is up-to-date	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Reports are verified by the lead agency	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Specific requirements in deed or decision documents have been met	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
	Violations have been reported	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
	Other problems or suggestions:	<input checked="" type="checkbox"/> Report attached
	<u>NYSDOH maintains an outreach program to inform the public about the advisories and restrictions. A discussion of this program is included in Appendix 8.</u>	
2.	Adequacy	<input checked="" type="checkbox"/> ICs are adequate <input type="checkbox"/> ICs are inadequate <input type="checkbox"/> N/A
	Remarks: <u>Advisories and restrictions in place, exposures to public are being controlled. However, there is evidence that some anglers disregard the advisories and restrictions and consume fish from the Hudson River.</u>	
D. General		
1.	Vandalism/trespassing	<input type="checkbox"/> Location shown on site map <input type="checkbox"/> No vandalism evident
	Remarks: <u>Signs are checked regularly, if reported missing, signs are replaced.</u>	
2.	Land use changes on site	<input checked="" type="checkbox"/> N/A
	Remarks	
3.	Land use changes off site	<input checked="" type="checkbox"/> N/A
	Remarks	
4.	Implementation of fish consumption advisories	
	Remarks: <u>Advisories and restrictions are in place. NYSDOH continues to make regular updates to the outreach program.</u>	
5.	Implementation of fishing restrictions	
	Remarks: <u>NYSDEC regulations include catch and release only for the Hudson River from the Troy Dam upstream to Bakers Falls in the village of Hudson Falls and tributaries in this section to first barrier impassable by fish, including Mohawk River below the Route 32 bridge.</u>	

VI. GENERAL SITE CONDITIONS			
A. Roads	<input type="checkbox"/> Applicable	<input checked="" type="checkbox"/> N/A	
1.	Roads damaged	<input type="checkbox"/> Location shown on site map <input type="checkbox"/> Roads adequate	<input checked="" type="checkbox"/> N/A
	Remarks:		

B. Inspections (Not Applicable)				
Name (nearby location)	Inspection Date	Purpose of Site	Identified Incomplete or Deficient Items	Follow Up
North Rogers Island	10/5/2022	Site of Former Fort Edward Dam, and a water quality sampling location	None	N/A
CUs 0 and 1	10/5/2022	Dredging location at northern end of site.	None	N/A
TD1 Fish Station	10/5/2022	Annual fish sampling location	None	N/A
Moreau Launch	10/5/2022	Barge loading area for fill and cap materials	None	N/A
TD2 Fish Station	10/5/2022	Annual fish sampling location	None	N/A
TD3 Fish Station	10/5/22	Annual fish sampling location	None	N/A
TD4 Fish Station	10/5/22	Annual fish sampling location	None	N/A
TD5 Spring fish station	10/5/22	Annual fish sampling location	None	N/A
TD5 Fall fish station	10/5/22	Annual fish sampling location	None	N/A
South Griffin Island riverine fringing wetland reconstruction	10/5/22	Riverine fringing wetland reconstruction area	None	N/A
ND3 Fish station	10/5/22	Annual fish sampling location	None	N/A
NYSDEC Hotspot 28	10/5/22	Habitat reconstruction area.	None	N/A

Inspection Roster	
Organization	Name
EPA	Daniel Wiener
EPA	Michael Cheplowitz
WSP	Michael Traynor
WSP	Juliana Atmadja
WSP	Solomon Gbondo-Tugbawa
WSP	Kenneth Takagi
Anchor QEA	Ryan Davis

VIII. OVERALL OBSERVATIONS	
A.	Implementation of the Remedy
	<p>Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).</p> <p><u>The goals of the remedy are to reduce the risks to humans and ecological receptors by reducing PCB levels in fish and to minimize the downstream transport of PCBs by reducing PCB concentrations in river sediments through dredging, capping, and monitored natural attenuation. Dredging as prescribed in the Record of Decision (ROD) has been completed and backfill has been completed. Habitat reconstruction has been completed and is being monitored for benchmark and success criteria. Monitoring of natural recovery in water, fish, and sediment will continue. Fish data will be assessed against the remediation targets and the remediation goal as defined in the ROD.</u></p>
B.	Adequacy of System Operations
	<p>Describe issues and observations related to the implementation and scope of System Operation procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.</p> <p><u>Land-based facilities have been demobilized and restored. OM&M sediment sampling commenced in the fall of 2021. EPA is reviewing GE's updated OM&M plan, which was submitted in 2022. OM&M plans are being reviewed on an ongoing basis. OM&M for Phase 1 and Phase 2 caps and habitat is ongoing. Reconstructed wetlands were observed on previously dredged and capped portions of the river bottom. Additional planting and habitat construction and maintenance items measures were discussed and implemented for the program. Sediment cap integrity was not assessed during the inspection, but a cap assessment is included in Appendix 4 of this five-year review.</u></p>
C.	Early Indicators of Potential Remedy Problems
	<p>Describe issues and observations such as unexpected changes in the cost or scope of System Operations or a high frequency of unscheduled repairs that suggest that the protectiveness of the remedy may be compromised in the future.</p> <p><u>Data collection for OM&M underway (i.e., sediment, fish, water). Data are being reviewed as they are received. No problems have been noted to date.</u></p>
D.	Opportunities for Optimization
	<p>Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.</p> <p><u>A new iteration of the OM&M plan is being implemented. The scope for the OM&M program is under continuous review with an adaptive approach for updates and revisions. Variability (in year and year to year) in water, fish, and sediment datasets presents a large challenge for assessing the remedy as part of OM&M. Additional adjustments to the monitoring program may be made as necessary in the future.</u></p>

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Final Third Five-Year Review Report for the Hudson River PCBs Superfund Site

APPENDIX 6-2

FIVE-YEAR REVIEW SITE INSPECTION CHECKLIST OU2

ATTACHMENT A INSPECTION PHOTO LOG

Prepared by:

USEPA

July 2024

Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 1. Water column sampling location north of Rogers Island. Remnant Deposit 5 is visible in the background.



Photo 2. Location of CUs 0 and CU 1, where silting in after dredging was observed.

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Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 3. Cove in CU8 that is included in the TD1 fish sampling area.



Photo 4. TD1 fish sampling location and CU6 (looking south).

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Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 5. NYSDEC Moreau launch and loading area during dredging (Reach 8).

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Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 6. TD2 fish sampling area. A short-term response action (shoreline stone placement) is visible along the shoreline in the background as part of the Hudson River floodplain program.

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Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 7. TD3 fish sampling location near the confluence with Snook Kill.

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Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 8. Fish sampling location TD4.

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Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 9. Fish sampling location TD5 along West Griffin Island.

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Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 10. Reconstructed wetland at the southern tip of Griffin Island.

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Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 11. Fish sampling location ND3.



Photo 12. NYSDEC Hotspot 28, which was identified as a high-priority dredging area. A monitored habitat construction area was established on top of the fill.

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Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 13. The southern extent of NYSDEC Hotspot 28.



Photo 14. Fish sampling location ND4.

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Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 15. Fish sampling location ND5 with a wetland reconstruction area in the background.



Photo 16. The Schuylerville Dix Bridge water column sampling location.

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Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 17. Fish sampling location SW1.



Photo 18. Fish sampling location SW2.

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Representative photographs with descriptions taken throughout the 40 miles of OU2.



Photo 19. Fish sampling location SW3.

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