

Good Afternoon,

Attached is EPA's Partial Disapproval/Conditional Approval Letter responding to GE's On-Site and Off-Site Transportation and Disposal Plan. For your convenience, we have summarized the letter below:

Brief Summary of EPA Disapproval of GE's Transportation and Disposal Plan

- Via a letter dated June 4, EPA partially disapproved and partially conditionally approved GE's On-Site and Off-Site Transportation and Disposal Plan (the "T&D Plan"). EPA disapproved the portions of the Plan that discuss or evaluate rail transportation and conditionally approved the remainder of the T&D Plan, subject to a number of conditions, summarized below.
- EPA required that GE submit an entire Revised T&D Plan, for EPA review and approval, by October 15, 2024. After GE submits the revised document, there will be a public meeting and public input period for GE's Revised T&D Plan. The dates for the public meeting and the public input period are to be determined.

The significant conditions of EPA's rejection of portions of GE's T&D Plan are as follows:

- **In the Revised T&D Plan, GE must fully evaluate the feasibility and appropriateness of using rail for off-site (out-of-state) disposal and for on-site transportation of the lower-level PCB contaminated material to the Upland Disposal Facility (UDF) to be constructed in the Town of Lee.**
 - GE must evaluate rail from Pittsfield down to Rising Pond in Great Barrington, including, but not limited to, possible rail siding locations by the Pittsfield Wastewater Treatment Plant, near Woods Pond in Lee, and adjacent to Rising Pond.
 - GE must conduct a general qualitative evaluation and description of the community impacts of rail vs. trucking vs. hydraulic pumping. GE must conduct a quantitative comparison of estimated injuries, fatalities, and accidents for rail vs. trucks and greenhouse gas emissions for rail, truck, and hydraulic pumping.
- **GE must include a robust evaluation of the use of pumped hydraulic transport of sediments.** EPA determined hydraulic pumping is feasible in at least Woods Pond and potentially from other locations; therefore, among other requirements, GE must assume that hydraulic pumping can be used from Woods Pond and River Reach 5C (immediately upstream of Woods Pond) to the UDF disposal location. Hydraulic transport can significantly reduce the amount of truck traffic, eliminating 50,000 or more truck trips.
- **EPA prohibited GE from using the following roads, except under limited circumstances with prior EPA approval:**
 - Route 183 through the center of Lenox.
 - Route 102 west through West Stockbridge.
- **EPA required that GE use Main Street (Route 20) through the center of Lee only as an alternate or secondary truck transportation route.**
- Further details regarding the required contents of GE's Revised T&D Plan can be found in EPA's letter to GE.

If you have any further questions, please direct them to Ashlin Brooks - Community Involvement Coordinator at brooks.ashlin@epa.gov.

Thank you,

Ashlin Brooks
Community Involvement Coordinator
U.S. EPA - New England, Region
15 Post Office Sq, Suite 100
Boston, MA 02109
Cell: (617) 913-9140