

Good Evening,

EPA issued separate Conditional Approval Letters requiring GE resubmit for EPA approval GE's *Quality of Life (QOL) Compliance Plan* dated December 20, 2023, and GE's *Updated Project Operations Plan* dated January 25, 2024. GE must resubmit both revised plans by November 22, 2024. EPA will hold a public input period after GE resubmits the Revised Plans so that the public can provide EPA input on the Revised Plans.

EPA also issued a Fact Sheet titled *Rest of River Cleanup and the Upland Disposal Facility Will Not Pose a Health Threat from Airborne PCBs*. This Fact Sheet answers questions EPA has heard regarding the potential for the cleanup to result in airborne PCBs that could affect people's health. As stated in the Fact Sheet, air sampling for PCBs conducted over 20 years by both EPA and GE during past cleanups at the GE-Pittsfield/Housatonic River Site demonstrates that the Rest of River cleanup can be safely implemented. EPA will hold a public meeting in September or October to discuss the Fact Sheet, risk-based action levels, and data collected over 20 years at the Site.

The Quality of Life Compliance Plan or "QOL" is GE's plan for preventing and mitigating potential air quality, noise, odor, and light impacts; minimizing and mitigating transportation-related impacts; and coordinating with local governments and affected residents/landowners. The QOL Plan includes quantitative and qualitative QOL Standards for air, odor, noise, and lighting. The QOL Plan contains a stop work requirement if certain quantitative standards are exceeded.

The Updated Project Operations Plan or "POP" is a general, site-wide plan comprised of several topic-specific plans and procedures that GE must follow in implementing the Rest of River Cleanup. The POP covers topics such as Site Management, Emergency Procedures, Air Monitoring, and Construction Quality. Some of the topics covered by the POP will be covered in more detail in area specific Work Plans.

For your convenience, we have summarized the main points of EPA's letters regarding GE's QOL and POP Plans below:

EPA's required changes to GE's **Quality-of-Life** plan are as follows:

- GE must add a stop-work requirement when certain levels of airborne PCBs set by EPA are detected. In such cases, EPA must approve appropriate response actions before GE can restart work.
- GE must evaluate additional mitigation measures for conditions that could cause quality-of-life issues, complaints, or result in an exceedance of the QOL Standards. In addition to the standards already in the current plan, GE must add qualitative standards to mitigate observations of visible dust and quantitative standards for excessive noise.

- GE must obtain EPA approval prior to working before 7:00 a.m. or after 9:00 p.m., or at any time on weekends or state or federal holidays, except in the case of emergencies.
- GE is required to strengthen provisions regarding GE's assessments of public roads and GE's obligations regarding possible maintenance and/or repair of roads and other infrastructure impacted by GE's cleanup work.

EPA's required changes to GE's **Project Operations Plan** are as follows:

- EPA required modifications and further details regarding GE's plans for Waste Characterization, Soil Covers, Site Management, Air Monitoring, Construction Quality, Emergency Procedures, and Construction Monitoring.
- Examples of these modifications GE must incorporate into their revised Project Operations Plan are as follows:
  - A requirement for GE to conduct a minimum of two baseline sampling rounds for PCB air levels prior to work in remediation areas and at the UDF. Monitoring locations will focus on areas with the highest density and sensitivity of receptors, such as residential neighborhoods or heavily used recreational areas.
  - Further details regarding GE's monitoring of odor and light issues.
  - GE must coordinate and plan emergency response drills during cleanup, if requested by local municipalities.
  - Further details regarding GE's monitoring of River water for excess turbidity during cleanup.
  - GE must implement additional measures to minimize contact with impacted soil and sediment such as (i) designated clean access roads and appropriately-sized construction equipment, (ii) general practices or metrics when moving impacted equipment to subsequent remediation areas over clean access roads or public roadways (such as visual verification of the removal of impacted soil/sediment from construction equipment), and (iii) wipe sampling for equipment leaving the site to confirm that the equipment has been decontaminated.

Further details are contained in EPA's letters to GE. Both Revised Plans will have a public input period after GE submits them to EPA and prior to EPA approval.

EPA's Letter regarding GE's **Quality-of-Life** plan can be found here:

[\[https://semspub.epa.gov/src/document/01/678382\]](https://semspub.epa.gov/src/document/01/678382)

EPA's Letter regarding GE's **Project Operations Plan** can be found here:

[\[https://semspub.epa.gov/src/document/01/678383\]](https://semspub.epa.gov/src/document/01/678383)

EPA's Fact Sheet titled *Rest of River Cleanup and the Upland Disposal Facility Will Not Pose a Health Threat from Airborne PCBs* can be found here:

[\[https://semspub.epa.gov/src/document/01/678381\]](https://semspub.epa.gov/src/document/01/678381)

Thank you,

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