

#### **IV. Endangerment Determination**

Actual or threatened releases of hazardous substances from the 1 ½ Mile Reach, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

#### **V. Exemption From Statutory Limits**

The removal action recommended in this Action Memorandum meets the requirements of CERCLA Section 104(c): a response action continued beyond twelve months and valued at over \$2 million that is otherwise appropriate and consistent with the remedial action to be taken at the Site. No additional remedial activities are expected to be performed in the 1 ½ Mile Reach. However, EPA is evaluating the need for, and the extent of, remedial actions in the Rest of the River (as defined by the Consent Decree) below the confluence of the East and West branches of the river. Excavating and removing contaminated sediment and riverbank soil upstream in the 1 ½ Mile Reach will not interfere with likely remedial alternatives to address sediment and soil contamination downstream. Accordingly, this response action is consistent with the remedial action to be taken at the Site. This removal action is also appropriate because the migration of contaminants further downstream will be minimized. The Proposed Action will contribute to the efficient, cost-effective performance of a long-term remedial action for the Housatonic River.

#### **VI. Proposed Action and Estimated Costs**

##### **A. Proposed Action**

###### ***1. Proposed Action Description***

The May 26, 1998 Combined Action and EE/CA Approval Memorandum demonstrated that high levels of PCBs were detected in surficial sediments, bank soils, and floodplain samples throughout the 1 ½ Mile Reach. Based upon the threat posed by such contamination, the following removal action objectives were established for the 1 ½ Mile Reach:

- Remove, treat, and/or manage PCB-contaminated river sediments to prevent human exposures exceeding risk-based levels by the dermal adsorption and incidental ingestion routes.
- Remove, treat, and/or manage PCB-contaminated river sediments to prevent ecological exposures exceeding risk-based levels.
- Remove, treat, and/or manage PCB-contaminated riverbank soils to prevent human exposures exceeding risk-based levels by the dermal adsorption and incidental ingestion routes.

- Remove, treat, and/or manage PCB-contaminated riverbank soils to prevent ecological exposures exceeding risk-based levels.
- Eliminate or mitigate existing riverbank soil and sediment sources of contamination to the 1 ½ Mile Reach of the Housatonic River.
- Prevent recontamination of previously remediated areas and further contamination of other areas.
- Prevent the downstream migration of contaminated sediments and bank soils.
- Minimize long- and short-term impacts on wetland and floodplain areas.
- Enhance habitat (riparian and aquatic) in a manner consistent with the above objectives.

The 1 ½ Mile Reach habitat restoration objectives are listed below and are similar to those established by the natural resource trustees for Connecticut and Massachusetts, the U.S. Fish and Wildlife Service, and the National Oceanic and Atmospheric Administration (the “Natural Resource Trustees”) for the Upper ½-Mile Reach.

- Implement the removal action for the 1 ½ Mile Reach as approved by EPA.
- Perform the restoration, including the enhancement of the river sediment and bank habitat, in accordance with the Consent Decree, to increase the diversity and productivity of the biological community.
- Restore the riverbank to provide overlying cover, in accordance with the Consent Decree, and to enhance the bank vegetation by reestablishing plantings using native species.
- Minimize the potential for erosion of residual PCB-containing bank soils and river sediments that would result in recontamination of river sediments or transport of PCBs, and which could impair the river restoration by adversely impacting the ecological receptors.

#### **Contaminated soils and sediments response actions**

Removal activities are limited to riverbank soils and sediments in the 1½-Mile Reach. As discussed previously, GE is responsible for cleanup of residential and recreational properties beyond the top of bank. For the purpose of this Action Memorandum, the top of the bank is defined as the highest point of the bank slope where the “slope breaks down.”

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.

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