The sediment removal areas were developed in conjunction with USEPA and MDEP, based on a detailed review of the relative concentration of PCBs present in both the River sediments and adjacent bank soils. The locations and volumes of sediment to be removed are discussed in Sections 4 and 7 of this Work Plan. It is anticipated that approximately 8,100 cubic yards (cy) of sediment will be removed. The general sediment removal and restoration approach involves diverting the River around established work areas in a phased, area-by-area approach primarily using a water diversion/containment structure such as steel sheetpiling or other appropriate means, dewatering the work cell in which work will be performed, treating the water as required, and performing sediment removal, replacement, and restoration activities. The removed sediment will be permanently consolidated with other GE site-related materials at USEPA-approved locations at the GE facility. Following removal, the sediment removal areas will be capped and armored using a multi-layer cap system. Aquatic enhancement structures will subsequently be installed as part of the ½-Mile Reach restoration activities.

The current spatial average PCB concentration for the top foot of sediment in the ½-Mile Reach is approximately 55 ppm. Following implementation of the sediment removal and replacement activities, the sediment with the highest PCB concentrations will have been removed and the spatial average PCB concentration in the surficial sediment (top foot) will be reduced to less than 1 ppm. Further, the proposed sediment replacement activities will effectively isolate any remaining PCB-containing sediment and minimize the potential for resuspension of sediments, desorption of PCB from the sediments into the water column, and direct contact of humans and biological receptors with PCB-containing sediment.

## 1.3.2 Bank Soil-Related Activities

To the extent practical, the bank soil removal activities will be conducted in coordination with the sediment removal and restoration activities. For the river bank soils, this will involve the removal of bank soils, to a maximum depth of three feet, as necessary to achieve spatial average PCB concentrations less than 10 ppm in the top foot and less than 15 ppm in the 1- to 3-foot depth increment. In accordance with the USEPA's letter of December 1, 1998, the bank soil removal actions will achieve these average PCB concentrations in each of seven river bank averaging areas specified by the USEPA. In addition, GE will remove and/or stabilize bank soil along portions of the bottom or the "toe of banks," as agreed to by GE, USEPA, and MDEP. The locations and volumes to be removed to achieve the specified cleanup levels are discussed in Sections 4 and 8 of this Work Plan. Following removal, the soil removal areas will be backfilled and the bank habitat will be restored using an engineered soil and vegetative cover, except along the lower banks at the toe of the slope, where armor stone will be placed on the bank surface for erosion protection. As with the sediments, the removed soil will be permanently consolidated with other GE site-related materials at USEPA-approved locations at the GE facility.

It is estimated that the bank soil removal activities involve the removal of approximately 4,300 cy of bank soils and the replacement and restoration of approximately 52,000 square feet of bank area. An additional 340 cubic yards of bank soil will be removed between the sheetpiling and the River at East Street Area 2 to help complete source control activities in that area. The current spatial average PCB concentrations for the top foot and 1-to 3-foot depth increment in the <sup>1</sup>/<sub>2</sub>-Mile Reach are approximately 198 ppm and 87 ppm, respectively. Following implementation of the bank soil removal and restoration activities, the bank soils with the highest PCB concentrations will have been removed and the spatial average PCB concentrations will be reduced to less than 10 ppm in the top foot and less than 15 ppm in the 1- to 3-foot depth increment, both in the overall <sup>1</sup>/<sub>2</sub>-Mile Reach and in each of the averaging areas specified by the USEPA. Further, any PCBs contained in the subsurface soil underlying the areas subject to these removal/restoration measures will be effectively isolated, thus preventing erosion from these subsurface soils and direct contact of human or biological receptors with these soils.

United States et al. v. General Electric Company (D. Mass.)

## Appendix F to Consent Decree

Removal Action Work Plan for Upper ½ Mile Reach of Housatonic River, dated August 1999, and EPA approval letter dated August 5, 1999

Pittsfield/Housatonic River Site General Electric Company Pittsfield, Massachusetts

October 1999



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