
**PHASE 2 PERFORMANCE STANDARDS
COMPLIANCE PLAN FOR 2015**

Appendix D

to

**Remedial Action Work Plan for Phase 2 Dredging and
Facility Operations in 2015**

HUDSON RIVER PCBs SUPERFUND SITE



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Section 3.1.1 of the revised Statement of Work (SOW) for Remedial Action and Operations, Monitoring and Maintenance (Appendix B to the Consent Decree), issued by the United States Environmental Protection Agency (EPA) in December 2010, requires that the Remedial Action Work Plan (RAWP) for Phase 2 dredging and facility operations in each year of Phase 2 must include a Phase 2 Performance Standards Compliance Plan or updates to a previous such plan. The RAWP submitted by General Electric Company (GE) for 2014, revised in July 2014, included (as Appendix D) a *Performance Standards Compliance Plan for 2014* (2014 PSCP). That plan described the actions that GE would take during 2014 operations to address: (1) the Phase 2 Engineering Performance Standards (EPS), which consist of a Resuspension Performance Standard, a Residuals Performance Standard, and a Productivity Performance Standard; (2) the Phase 2 Quality of Life Performance Standards (QoLPS), which apply to air quality, odor, noise, lighting, and navigation; and (3) the substantive water quality requirements (WQ Requirements) issued by EPA for Phase 2, which consist of requirements relating to in-river releases of constituents not subject to the EPS and substantive requirements for discharges from the sediment processing facility to adjacent surface waters (i.e., the Champlain Canal and Bond Creek).

There are only a few substantive changes to the 2014 PSCP for the dredging and facility operations to be conducted in 2015. Accordingly, this *Performance Standards Compliance Plan for 2015* (2015 PSCP) incorporates by reference the provisions of the 2014 PSCP with the exception of a number of specific changes set forth below.

Overview of Planned Operations for 2015 and Applicable Plans

Dredging operations in 2015 will be conducted in the following areas: Certification Unit (CU) 60 in Reach 8 of the Upper Hudson River; portions of CUs 64 and 65 that were not dredged in 2014 and all of CU 66 in Reach 7 (the Landlocked Area); CUs 94 through 96 in Reach 3; and portions of CU 99 in Reach 1 that were not dredged in 2014. Dredging and related operations in CU 60, which is located near the Thompson Island Dam, are covered by a separate *Phase 2 Remedial Action Work Plan for Certification Unit 60* (CU 60 RAWP), as revised in April 2015, due to the special challenges posed by working in close proximity to the dam. Dredging and related operations in the remaining dredge areas in Landlocked Area, which is a non-navigable portion of the river, are covered by the separate *Phase 2 Remedial Action Work Plan for Reach 7 – Landlocked Area* (Reach 7 RAWP), submitted in 2014, and Addendum No. 1 to the Reach 7 RAWP, revised in April 2015, which describes updates and modifications to the Reach 7 RAWP for the 2015 season. Dredging and related operations in CUs 94 through 96 and 99 are covered by GE's *Remedial Action Work Plan for Phase 2 Dredging and Facility Operations in 2015* (2015 RAWP), to which this 2015 PSCP is an appendix.

GE's design plans for dredging in these CUs are included in the following documents: The design for dredging in CU 60 is provided in GE's *Supplemental Design Revisions for 2015* (2015 Design Revisions), as revised in April 2015; the design for dredging the remaining portions of the Landlocked Area is provided in GE's *Phase 2 Final Design Report for Reach 7 (the Landlocked Area)*, submitted and approved in 2014; the design for dredging in CUs 94 through 96 is provided in GE's *Phase 2 Final Design Report for CU85 through CU96* and Addendum No. 1 to that report, as approved by EPA in October 2014 and modified by the 2015 Design Revisions; and the design for dredging in the remaining portion of CU 99 is provided in Addenda Nos. 2 and 8 to the *Phase 2 Final Design Report for 2013*, which addressed Reaches 1 and 2 and were approved by EPA in October 2014.

This 2015 PSCP has been prepared as an appendix to the 2015 RAWP, but it also applies to dredging in CU 60 and in the remaining portions of the Landlocked Area.

Incorporation of 2014 PSCP and Specification of Changes

The provisions of the 2014 PSCP are incorporated by reference herein with the following exceptions:

- All references in the 2014 PSCP to 2014 should be understood to refer to 2015.
- All references in the 2014 PSCP to RAWPs and design reports should be understood to refer to the applicable RAWPs and design reports for 2015, as identified above.
- During 2015, the net PCB load criteria and Total PCB concentration criteria under the Resuspension Performance Standard, as specified in Sections 2.1.2 and 2.1.3 of the 2014 PSCP, will not be applied at the Stillwater far-field monitoring station and far-field monitoring will not be conducted at that station, since all CUs to be dredged in River Section 3 in 2015 will be downstream of that monitoring station. Further, when dredging is being performed in River Section 3 in areas that are less than one mile upstream of the Waterford monitoring station (i.e., in the southern portion of CU 99), the Waterford far-field compliance location will be moved south to water quality monitoring buoys located at River Mile 156.4, and a buoy will be added at the permanent Waterford far-field location to serve as a near-field monitoring location.
- Based on prior experience and monitoring results, routine monitoring for metals, as described in Sections 3.1 and 3.2 of the 2014 PSCP, will not be conducted in 2015.
- The procedures described in Sections 4.2 through 4.5 of the 2014 PSCP for verification of achievement of the design dredge elevation, sampling after the initial dredge pass, and evaluation of response actions under the Residuals Performance Standard will be modified for sub-unit CU 60-2 in CU 60 and sub-unit 95-2 in CU 95, as described in the CU 60 RAWP and the 2015 RAWP, respectively.

- For 2015, the capping Evaluation Level and Control Level, as described in Section 4.6.4 of the 2014 PSCP, will both be 11.0 percent for total area capped and 3.0 percent for area capped with inventory present.
- The Phase 2 target productivity volume of 350,000 cubic yards (cy) per year, specified in Section 5.1 of the 2014 PSCP under the Productivity Performance Standard, will not apply to the 2015 season because the 2015 season is anticipated to be the final year of Phase 2 dredging and there are less than 350,000 cy of sediments targeted for dredging in the remaining Phase 2 dredge areas. Rather, the target will be to remove the volume of sediments necessary to complete dredging in the Phase 2 dredge areas.
- The production schedule specified in Section 5.2 of the 2014 PSCP will be replaced by the production schedule specified in Table 4-1 of the 2015 RAWP, based on dredging in the CUs identified above.
- The reference in Section 5.5 of the 2014 PSCP to the Transportation and Disposal Plan for 2014 should be understood to refer to the last Transportation and Disposal Plan that has been approved by EPA.
- The design analysis regarding the National Ambient Air Quality Standards (NAAQS), set forth in Section 6.2.3 of the 2014 PSCP, will be supplemented by a statement that dredging and facility operations anticipated for 2015 are expected to be similar to those in 2012-2014, with no operational or equipment changes that could significantly affect emissions of pollutants subject to NAAQS, and that therefore, given the EPA-approved evaluations for prior years, a revised NAAQS analysis is not considered necessary and has not been completed for 2015, and no provisions for monitoring, control, or contingency actions for such pollutants will be necessary in 2015.
- The second paragraph in Section 11.2.1 of the 2014 PSCP will be modified to provide that, after all sediment processing for the 2015 season has been completed, the specified off-season monitoring at Outfall 001 discharge will be implemented and will extend until the water treatment plant is decommissioned as part of facility demobilization. The second paragraph in Section 11.2.2 of the 2014 PSCP will be modified to provide that, following 2015 operations, beginning two weeks after the cessation of sediment management activities at the processing facility, monitoring of Outfalls 002 and 003 will be suspended.