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MEMORANDUM

TO: Christopher Ketchen, Town Manager, Lenox, MA

FROM: Weston & Sampson

DATE: May 20, 2024

SUBJECT: Upland Disposal Facility –Operation, Monitoring, and Maintenance Plan

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Weston and Sampson Engineers, Inc. (Weston & Sampson) has reviewed the relevant technical documents and reports pertaining to the operation, maintenance, and monitoring of the proposed Upland Disposal Facility (UDF) for the GE-Pittsfield/Housatonic Rest of River Project. In this memorandum we provide our review comments on the landfill engineering and site hydrogeology and environmental assessment aspects of the Project. The documents which were the primary focus of our review and comment efforts were as follows:

- *Upland Disposal Facility Operation, Maintenance, and Monitoring Plan*, Arcadis, February 2024.

To support this technical review, we also referred to the following documents for supporting information:

- *Upland Disposal Facility Final Design Plan*, GE-Pittsfield/Housatonic River Site; Arcadis, February 2024.

The format for this memorandum generally presents a brief bulleted synopsis of comments made on the Operation, Monitoring, and Maintenance Plan. The memorandum has two main sections focusing on Landfill Engineering and Site Hydrogeology and Environmental Assessment.

Landfill Engineering

Section 3.3 – Environmental Monitoring

- Comment #1: Air monitoring is being performed for particulate matter less than 10 microns in aerodynamic diameter (PM_{10}). This represents potentially respirable dust and should be performed. However, if dust released from the UDF is larger in aerodynamic diameter, this represents a potential release of PCBs to the environment. Continuous monitoring for total dust with an action level set based upon potential PCB concentrations in materials being placed in the landfill (e.g., 50 mg/kg) is recommended.
- Comment #2: Response actions are included in the Quality of Life (QOL) Plan. Not included in the QOL Plan is notifications to local government bodies should there be an exceedance of an Action Level that required active response and potentially poses a risk to the community.

Section 4.5 – Cover Material Management

- Comment #3: While the daily and interim cover are well explained, there should be a mechanism for periodic cover inspections. Daily cover (6" soil, plastic, or spray cover) per the plan can be in place for up to 180 days. Soil on slopes can easily erode from precipitation events and plastic sheeting can be destroyed from windstorm events. An inspection program should be described and implemented.
- Comment #4: During the use of soil for daily cover, will the cover soil be visually different from the consolidated fill material? If not, it may be hard to determine if adequate cover is in place or if the cover has eroded. Inspection of soil cover and evaluating erosion should be discussed further.
- Comment #5: It is not specified whether the daily cover soil is clean and free of contamination, or if contaminated soils will be allowed to be used. If contaminated soils are used, acceptance criteria should be provided. If clean soil is used, clean should be defined.

In general, based on our review of the OMM Plan, the UDF design meets the requirements for closure and post-closure care of a hazardous waste landfill as specified under Subtitle C of the Resource Conservation and Recovery Act (RCRA). The basic requirements of OMM for a Subtitle C landfill include:

- Installing and maintaining a final cover.
- Continuing operation of the leachate collection and removal system until leachate is no longer detected.
- Maintaining and monitoring the leak detection system.
- Maintaining ground water monitoring.
- Preventing storm water run on and runoff.
- Installing and protecting surveyed benchmarks.

In general, the OMM plan meets the above requirements, however, we recommend that GE and their contractors address the comments provided.

Site Hydrogeology and Environmental Assessment

In general, the planned groundwater monitoring well network has monitoring wells placed at appropriate locations to evaluate any potential impacts to groundwater. The planned analyses for this monitoring are appropriate for this evaluation as well. No additional comments are provided.