



TOWN OF LENOX
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Jay R. Green, J.D.
Town Manager

March 20, 2026

Mr. Josh Fontaine
Remedial Project Manager
Rest of River
5 Post Office Sq. Suite 100
Boston, MA 02109-3912

[VIA EMAIL: Fontaine.Joshua@epa.gov]

Re: Town of Lenox Comments, Road Assessment Report, February 2026

Dear Mr. Fontaine and EPA staff:

The Town of Lenox submits this letter to communicate its concerns and comments regarding the Road Assessment by General Electric (GE) and its contractors for roads identified and associated with the construction of the Upland Disposal Facility (UDF) and Rest of River (ROR) cleanup operations. Lenox Dale will be impacted by GE trucking activity and other associated vehicular traffic during the construction of the UDF and ROR remediation work. This type of activity will affect the quality of life for our residents and businesses that live near and use these public ways.

The Town of Lenox has engaged Weston & Sampson as an independent third party for the purpose of evaluating various aspects of the Rest of River project. Weston & Sampson has aided the Town in the preparation of this letter along with feedback from its Public Works Superintendent, Land Use Director and Town Manager, all of whom have significant experience with public road maintenance and repair.

The Road Assessment Workplan (Arcadis, June 2025) was previously reviewed and commented upon by the Town and its consultant, Weston & Sampson. Deficiencies in the assessment and suggested corrections were provided. The road assessment was performed as originally scoped without modification. Lenox is concerned that, because of the limitations of the assessments being performed, the public will be left with long-term costs associated with repair of roadways and bridges that may be damaged by heavy truck traffic that the structures were not designed to handle.

Road Assessment Report Comments

Photographs of a bridge are not sufficient means of evaluating potential changes in structural integrity of a bridge.

Structural integrity of a bridge is based on the as-built materials, geometry, and current condition. Bridge evaluations should be based on National Bridge Inspection Standards (NBIS), which standardizes the inspection frequency, inspector qualifications, documentation and reporting and the AASHTO Manual for Bridge Evaluation (MBE), which provides the engineering procedures for condition evaluation, structural analysis of specific members and applicable Load Rating Methodology. **Failure to inspect a bridge using National Bridge Inspection Standards (NBIS) is not acceptable to the Town.**

The evaluations in place may fail to detect early structural weakening. Measurable Pavement Condition Index (PCI) decline may not be evident during the evaluation time frames.

The road assessment does not evaluate damage to the pavement structure of the roads caused by excessively high Equivalent Single Axle Loads (ESALs) over a short duration of time of which is beyond the roadways design parameters. Observing, measuring and evaluating surface cracking of the wearing surface is considered insufficient. While surface failures may result and be evident within the evaluation time frames, the deterioration of pavement is not linear. Only incremental signs of distress may be evident within the evaluation period. Damage from heavy truck traffic often begins in subbase layers, as repeated deflection fatigue which can occur before visible cracking appears. **Using only measurable pavement condition index (PCI) is not acceptable to the Town.**

Evaluation of structural failure of the full pavement structure is not identified.

Identifying surface cracking, or cracking of the full thickness of bound pavement can provide some indication of subbase structural failure but not conclusively and particularly with a limited time duration for the evaluation.

The Town of Lenox is concerned that the pavement subbase will fail, evaluation of the subbase is not identified, and repairs will not address the failed subbase. Superficial repairs through repaving may take place and appear sufficient and at the time the pavement is placed but may leave the taxpayer with costly long-term issues associated with failed subbase. **Not having a plan to assess subbase beyond using (PCI) is not acceptable to the Town.**

There does not appear to be a mandatory repair trigger.

Without specifying conditions that would require repair, there is ambiguity in the assignment of repair responsibilities. This is not acceptable to the Town.

There is no tracking or measuring of the traffic or ESALs these activities will add to the subject roadways.

GE does not provide an estimate for the number of trucks that will be utilized during the project and especially during construction of the Upland Disposal Facility (UDF) when it is anticipated that numerous trucks will be utilized to transport materials to the UDF site. **Lenox insists that all daily truck counts, weights, and routes traveled be provided to the Town.**

In addition, there is no proposed tracking of truck traffic, the materials they are transporting, and the overall weight of the trucks and weight of the materials they are transporting.

It is common for loads to be tracked with all the information listed above such that payment can be made for materials delivered. **Thus, the Town believes that this information will be readily available to GE and thus, should be made available to the Town.**

As mentioned above, the requests for methodology submitted during the comment period for the Road Assessment Work Plan did not make their way into the Road Assessment itself. In its settlement agreement, Lenox specified and requested that certain tools and methods such as the use of LIDAR technology be used to identify and proactively protect the condition of its roadways while GE performed its obligations. Lenox is concerned that its reasonable requests and the obligations of GE under the settlement agreement are not being enforced.

Sincerely,

Jay R. Green, J.D.
Town Manager
Town of Lenox