



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

April 2, 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, Upland Disposal Facility Construction Supplemental Information Package, February 18, 2026

Dear Mr. Fontaine and EPA staff:

The Town of Lenox provides this letter to convey its comments regarding the *Upland Disposal Facility Construction Supplemental Information Package* submitted by General Electric (GE) and its contractors for the planned construction of the Upland Disposal Facility (UDF) for disposal of dredged sediments and soil/sediments removed from floodplains during the remediation of the Housatonic River to be performed by GE and their subcontractors. The Supplemental Information Package (SIP) presents a comprehensive description of construction-related elements and activities to be performed by the selected contractor (Charter Environmental) for construction of the UDF and related UDF operational support areas.

As requested by the Town of Lenox ("the Town"), Weston and Sampson Engineers, Inc. ("Weston & Sampson") has reviewed the relevant SIP documents. In general, all elements and activities necessary for the construction phase of the UDF have been adequately addressed and are in general accordance with the requirements of the UDF Revised Final Design Plan. Specifically, the SIP provides a Site Construction Plan (Section 2) that addresses all elements of the construction phase from pre-construction tasks through site preparation, earthwork, baseliner system, leachate collection and management system, stormwater management system, and site utility construction activities.

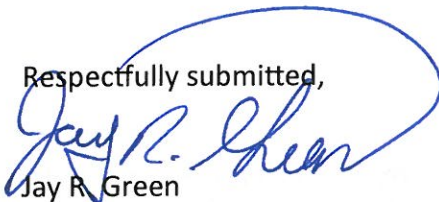
The SIP provides a Project Safety Plan (Section 3) which includes a site-specific Health and Safety Plan (provided in Appendix A) and a summary of the Spill Prevention, Control, and Countermeasures (SPCC) Plan that has been developed by Charter for the project. The SIP includes a Project Quality Plan (Section 4) which discusses best management practices (BMPs) to be implemented for control of noise, dust, lightning, and odors. The Project Quality Plan also includes a description of the field-based and laboratory-based construction quality assurance/quality control (QA/QC) systems to be implemented for the project. The SIP also

provides a project work schedule, submittal tracking procedures, and the source for backfill materials requiring import.

One potential element of the Rest of River Remedial Action project not addressed or included in the SIP is facilitation for receipt, dewatering, and processing for placement of sediment materials removed from the remediation area using hydraulic dredging methodologies and transported to the site via force main piping. In speaking with EPA staff during the conference call of March 30, 2026, the Town inquired about the absence of these items including water treatment facilities. EPA staff were aware of the absence and informed Lenox town staff that dewatering and water treatment facility construction will be addressed in a future submittal to EPA by GE and its contractors.

The Town suggests that the SIP be revised to communicate that information regarding the description and details of UDF site infrastructure (e.g., force-main piping route, dewatering area, dewatering liquid management, sediment treatment/thickening, etc.) will be provided in another submittal and at an anticipated time should receipt of hydraulically-dredged sediment at the UDF via force-main piping be implemented for the Rest of River Remedial Action project.

Respectfully submitted,

A handwritten signature in blue ink that reads "Jay R. Green". The signature is written in a cursive style and is enclosed within a blue oval shape.

Jay R. Green