

Hudson River PCBs Superfund Site



Community Advisory Group Meeting

July 27, 2006

Comments on Phase 1 Final Design Report

Contract 3: Processing Facility Construction & Operations

Contract 4: Dredging Operations

Contract 5: Habitat Construction

Contract 6: Rail Yard Operations

CHASP: Community Health and Safety Plan

EMP: Environmental Monitoring Plan

***Air related comments compiled separately**



Contracts 3 - 6

- **Public comment period ended May 24, 2006**
- **Approximately 260 public comments were received on FDR**
- **Public comments were reviewed by EPA, compiled with agency comments (NYSDEC, NYSDOH, etc.) and provided to GE. These represent the FDR comments**
- **Copies of all public comments were also provided to GE**



Contract 3 (Processing Facility Construction & Operations)

- 41 comments
- Generally comments included:
 - Baseline sediment samples in canal
 - Variety of stormwater questions
 - Equipment redundancy and reliability
 - Processing equipment rates and operation procedures
 - Enclosure or covering of processing equipment, staging areas and stockpiles
 - Site lighting
 - Modeling of noise and PCB air emissions



Contract 3

Summary of Comments & Responses

– Baseline Sediments Samples in Canal

- **Comment:** Are baseline sediment samples being collected in the canal near the wharf area prior to construction to document pre-construction conditions? Also, does GE intend to sample the sediment north of Lock 7 that will be removed for navigational purposes?
- **Response:** Environmental samples have been collected in the canal. Sediment removed from the canal near Lock 7 will be sampled prior to disposal.



Contract 3

Summary of Comments & Responses

– Stormwater

- **Comment:** Numerous comments were raised on the management/monitoring of stormwater discharges to Bond Creek.
- **Response:** Stormwater overflow into Bond Creek will be episodic and will originate from impervious surfaces in the support zone (i.e. no dredged sediment is managed in these areas). The Type 2 stormwater basins have been sized in accordance with the NYSDEC Stormwater Management Design Manual to treat stormwater for water quality. During Phase 1, GE will agree to monthly monitoring of this Type 2 stormwater for total suspended solids, oil & grease, and PCBs.



Contract 3

Summary of Comments & Responses

– Equipment Redundancy and Reliability

- **Comment:** Commenters have raised concerns over the reliability and lack of redundant equipment, most notably the use of one trommel screen.
- **Response:** A failure mode effects analysis was completed as part of the design process to evaluate the need for redundant equipment. Spare parts shall be onsite to ensure quick repair. Further, production is anticipated to occur only 6 days per week, allowing the seventh day to conduct preventative maintenance activities.



Contract 3

Summary of Comments & Responses

- **Processing Equipment Rates and Operation Procedures**
 - **Comment:** For some equipment, specify in greater detail procedures or equipment for dewatering facility
 - **Response:** Specific procedures or equipment will be developed and selected by the contractors and provided in the Remedial Action Work Plans submitted for review. EPA in consultation with the appropriate agencies will review and approve all aspects of the project to ensure that the final project will be operated in accordance with the ROD and the engineering and quality of life performance standards



Contract 3

Summary of Comments & Responses

- **Enclosure or Covering of Processing Equipment, Staging Areas, and Stockpiles**
 - **Comment:** Numerous comments were made on enclosing or covering of processing equipment, staging areas and stockpiles due to quality of life impacts.
 - **Response:**
 - Based on compliance with the QoLPS
 - Extensive monitoring as outlined in the Phase 1 Environmental Monitoring Plan will determine compliance
 - If an exceedance occurs, appropriate steps will be taken as outlined in the Community Health and Safety Plan (CHASP)



Contract 3

Summary of Comments & Responses

– Site Lighting

- **Comment:** No site lighting is shown at the barge unloading, work wharf, and railcar loading areas. Will lighting be needed at the waterfront at night and will railcar loading only take place during the daylight hours?
- **Response:**
 - Barge unloading area lighting is equipment mounted
 - Additional work wharf area lighting will be provided if necessary
 - Railcar loading is anticipated to only occur during daylight hours
 - Exchange of railcar sets can be performed without fixed lighting

Contract 3

Summary of Comments & Responses

– Modeling of Noise and PCB Air Emissions

- **Comment:** Numerous comments over what or if certain processes and equipment have been included in the noise and air modeling evaluations
- **Response:**
 - Modeling included all processes and equipment to be used
 - Separate trials will be performed to evaluate the effectiveness of the controls
 - Monitoring will be done to confirm model predictions and assumptions used in modeling
 - Mitigation measures will be in place in the event of an exceedance

Contract 4 (Dredging Operations)

- **108 Comments**
- **Generally comments included:**
 - **Yacht Basin access**
 - **Archeological / Cultural Resources**
 - **Noise (limit marine related impact noises)**
 - **Resuspension**
 - **Residuals**
 - **Feeder canal**
 - **Rogers Island water line**



Contract 4 (Dredging Operations)

- **Comments included:**
 - **Backfill in shoreline areas**
 - **Rock dike (north end Rogers Island east channel)**
 - **Docks**
 - **Navigational depth (post dredging)**



Contract 4

Summary of Comments & Responses

– Yacht Basin Access

- **Comment:** The dredging contractor will be required to identify the specific times of day for the ½ hour of non-project vessel ingress and egress from the Yacht Basin within a specified minimum timeframe. The contractor should provide such notice far enough in advance so that adequate notice may be provided to mariners.
- **Response:** The specific times of day for the ½ hour of non-project vessel ingress and egress from the Yacht Basin will be identified, where possible, 1 week in advance and will be part of the Notice to Mariners. The NYSCC will be consulted to determine what would constitute adequate advance notice.

Contract 4

Summary of Comments & Responses

– Archeological / Cultural Resources

- **Comment:** Numerous public comments have been raised regarding the protection of archeological / cultural resources.
- **Response:**
 - Dredging will avoid three of ten identified underwater resources and dredging will adequately avoid resources based on geotechnical considerations
 - Ongoing in-river resources evaluation and mitigation options



Contract 4

Summary of Comments & Responses

– Noise from dredging activities

- **Comment:** Noise modeling predicted exceedances of the noise standard during sheet piling and mooring dolphin installation. GE has indicated the presence of limited data available on mitigation measures to reduce noise during these activities.
- **Response:** GE will further investigate mitigation measures and collect noise data to determine the effectiveness of potential mitigation approaches.



Contract 4

Summary of Comments & Responses

– Resuspension

- **Comment:** Contingency equipment, such as silt curtains and sheet piling must be readily available to be put in place if needed.
- **Response:** Contract 4 specifications require the contractor to control resuspension. GE will be implementing a resuspension requirement that is lower than than the engineering performance standards. In the event of an exceedance, engineering controls and mitigation measures, including contingent resuspension control structures, will be implemented in accordance with the performance standard compliance plan.



Contract 4

Summary of Comments & Responses

– Residuals

- **Comment:** Numerous comments have been raised on the differences between inventory and residual dredging, number of re-dredging attempts.
- **Response:** The dredging specification are designed to control the contractors activities. GE will follow the requirements of the Performance Compliance Plan.



Contract 4

Summary of Comments & Responses

– Glens Falls Feeder Canal

- **Comment:** Has the capacity of the Glens Falls Feeder Canal been evaluated?
- **Response:** An evaluation of the Glens Falls Feeder Canal capacity was performed as part of the development of the Phase 1FDR. The canal's existing capacity was determined to be sufficient to handle the anticipated number of lockages per day.



Contract 4

Summary of Comments & Responses

– Rogers Island Water Line

- **Comment:** What actions are in place in the event that the Rogers Island water line is damaged
- **Response:** Precautions will be taken to prevent damage to this water line. Procedures for working near utility crossings are specified in the contractor specifications.



Contract 4

Summary of Comments & Responses

– Backfill in shoreline areas

- **Comment:** Backfill in shoreline areas does not appear to be in agreement with the language in the CD relative to restoring the original bathymetry in shoreline areas.
- **Response:** This comment is currently in dispute.



Contract 4

Summary of Comments & Responses

– Rock Dike (north end Rogers Island east channel)

- **Comment:** A standard provision of the State's permits for placing temporary fill in a river or stream requires the removal of this fill at completion of the work. Accordingly, the rock dike material will have to be removed from the river, not spread along the river bed.
- **Response:** GE is seeking approval to leave the natural materials from the rock dike in the same general area as the rock dike. GE believes the rock material will provide suitable habitat. EPA has suggested the use of the rock in restoring rip-rap along shorelines or elsewhere in the project.



Contract 4

Summary of Comments & Responses

– Docks

- **Comment:** Will advance notice be given to residents prior to dredging near docks and/or private structures.
- **Response:** The contractor is required to provide 21 days advance notice to the Construction Manager for dredging in and around docks and private structures. The Construction Manager is responsible for communication with the respective owners of the docks and private structures.



Contract 4

Summary of Comments & Responses

– Navigational Depth Post Dredging

- **Comment:** Although the ROD does not require it, when dredging is to occur within the navigation channel, it would be beneficial if the standard channel depth could be achieved
- **Response:** GE is not required to dredge to the standard channel depth (as defined in the ROD) unless inventory/residual dredging require them to do so.

*Additional navigation dredging may be completed to allow adequate vessel access to some areas including the Champlain Canal north of Lock 7



Contract 6 (Rail Yard Operations)

- **6 Comments**
- **very specific comments mostly relating to specification and drawing corrections/clarification**



Questions / Comments

