

## Technical Subcommittee Preliminary Review

April 5, 2006

*Primarily Site Work, Railroad Yard, Dewatering Facility, but also began to cover dredging, other issues.*

### Key Dates

- CAG meeting April 13 on FDR
- Technical Subcommittee meeting on bid specs/FDR sections 4 to 6 (dredging and habitat primarily) on April 20
- Comments on FDR due April 24
- CAG meeting April 27 on sections 4 to 6 and CHSP

### Overall Positive changes/findings

- Reduced structural fill 10,000 cubic yards, thus reducing truck trips, etc.
- Filter cake storage buildings have air filtration that will protect workers and the community from exposures from that particular source (concerns regarding other areas noted below).
- Self-contained storm water system, including lined railroad beds, ensures spillage is managed well on-site.
- Full rail loading capacity of 81 cars provides maximum loading on site.
- Changed access road, as requested by Ft. Edward.
- Only daylight hours for loading, thus minimizing night impacts to area.

### Clarification

- *Fill* is that brought in for the railroad bed and other needs for construction.
- *Backfill* is that clean material that will be used to replace sediment dredged from the river to restore riverbed/habitat. Such backfill will be of three types: gravel, medium sand, and medium sand amended with organic material (to increase the organic content of the backfill to make it better suited for use in promoting habitat recovery). This 3rd type of material was added to address EPA comments.
- *Capping* is using material to cap sediments in an area that has already been dredged to remove inventory (i.e., the significant contamination originally present will be removed), but still exceeds certain residual standards. One type of cap (Type A) can be placed in accordance with the residual standard when the average concentration in an area is less than or equal to 6ppm tri+ PCBs; a second more substantial type of cap (Type B) could be placed in areas that have concentrations greater than 6ppm, but only after 4 dredging passes have been completed, and only if EPA agrees that it is appropriate to place a cap in that particular area (please note that the group did not talk specifically about capping in near shore areas where the 3:1 slope provision applies).

### Issues/Questions

- **Data Availability.** What data will be readily and publicly available of all the numerous data produced? Suggestions include exceedance and monthly summary reports.
- **Full Covering of Facility Storage Sites/Bins.** Larger contaminated material (gravel, rocks, sticks, logs, etc.) will not be enclosed and could/will allow PCBs to volatilize to air. Are there are other facility areas that could allow exposure/volatilization? Furthermore, concern that air filtration in enclosed areas will only be used to meet human health exposure standards, thus, used intermittently, and, at least potentially, allowing lower levels of PCBs to volatilize to the environment. Encourage full coverage of all dredged materials not only for human health but to minimize contribution to overall environmental burden, as well as continuous air filtration.

- **Schedule.** Key issues for meeting 2007 dredging include the following. Is the lead-time for filter presses and/or other equipment a critical path item that would prevent 07 dredging? Even if this critical path is met, can the full construction get done in time for 07 dredging anyway? Will the Consent Decree, awaiting DOJ motion to enter into the court record, be completed by late May, before it becomes a critical path item? Can EPA, liaisons, the CAG, and others provide their input into the FDR/bid documents in time? Can GE revise the FDR/bid documents to EPA in sufficient time? How do we get the project started as soon as possible and also ensure project is done right and moves at pace necessary for success?
- **Dredging of canal between Locks Seven and Eight.** What sampling was done in this canal? Will the dredging of this canal for navigation purposes use an environmental dredge? Will the materials be dewatered? Shipped off-site? This is important as the first dredging of the project.
- **Noise.** Provide missing tables in hard copy. Can EPA provide tables for different receptors of sources of sounds for areas/places approaching or exceeding standards as was done in one example? Are suggested mitigations like work versus tug boats possible to simply agree to, or only as contingencies? Is more detailed modelling/analysis of potential areas of exceedances available? Newer technology for the crane and the hydrocyclones is good. Is there additional information on other pieces of equipment in terms of noise generated?
- **Traffic.** Is there any level of service analysis of traffic created by the dewatering facility, according to NYDOT standards? Is level of service degraded due to the dewatering facility construction and/or operation?
- **Emissions.** Is there any mitigation of diesel emissions from construction or on-going operations through such actions as diesel retrofits, low sulphur diesel fuel, other? Such possible mitigation efforts are technically possible. Would GE do these voluntarily? Can EPA compel them to do so?
- **Field Decisions.** How, who and where will “field” decisions be made regarding capping versus more dredging of sediments? This should be clarified in the FDR – the protocol should be clearly spelled out and understood by the CAG and the public. It is understood that there will be 4 passes of the dredge before GE/contractor can go to EPA to request capping for a Type B cap (see above), but that EPA may reserve the right to ask for more dredging. It has been clarified that Type A caps could be decided on with less than 4 dredge passes. Experience elsewhere has shown that after 4 passes, it’s unlikely further dredging will be effective.
- **Capping.** What are the different requirements/kinds of caps and how will they work? There is a need for the CAG and the public to clearly understand: 1) the difference between backfilling and capping; 2) how such decisions are made; 3) the level of total PCBs left in the River; 4) how effective the caps are; 5) what type of cap will be used when; 6) how much of the river bottom will be capped; and 7) what is life span of the cap(s) is and who will maintain them.
- **Controls on Dredging.** Are there enough contingency plans/ equipment in place given that GE states the dredging will be able to meet engineering standards without additional controls beyond the dredge technology and its operation? What kind of incentives/sanctions is GE imposing on its contractors to assure they meet the standards without controls? Can a more precautionary effort be made and controls installed prior to creating problems. Resuspension efforts should take a more preventative approach.
- **Resuspension Monitoring.** How will far and near field sampling be done, and for what (PCBs, totally suspended solids, turbidity)? Since the far field compliance point for PCBs is at least 1 mile downstream from dredging (at Thompson Island Dam for Phase I), how will the project ensure that PCB resuspended silts are not “smeared” downriver over clean or non-hot spot areas of the river? Please explain more about the study being done in Phase I to better understand this resuspension in the one-mile stretch between dredging and the compliance point.
- **Habitat.** To be discussed later.