



## TOWN OF LEE

32 Main Street, Lee, MA 01238  
www.lee.ma.us

R. Christopher Brittain,  
Town Administrator

January 9, 2024

Mr. Dean Tagliaferro  
EPA New England  
10 Lyman Street, Suite 2  
Pittsfield, MA 01201

The following is a list of comments from the Town of Lee regarding the Conceptual RD/RA Work Plan for Reach 5A

1. SKEO provided the following comment: Section 8 of the Conceptual RD/RA WP addresses sustainability considerations (pdf page 115). As part of this evaluation, the possible sources of greenhouse gases are to be described. TASC previously commented on the potential greenhouse gas emissions produced from the Upland Disposal Facility (UDF), which will contain disposed sediments and soils. Literature sources indicate that the anaerobic degradation of sediment organic matter leads to considerable gas production in landfills where contaminated sediments are disposed of; however, little is known about the magnitude of gas generation from dredged sediment (refer to Gebert et al., 2019; and Gebert and Knoblauch, 2017).

The town requests that the possible gas production from the UDF landfilled sediments and soils be included as part of the sustainability evaluation presented within the Conceptual RD/RA WP. In addition, the town does not feel that that current plan provided by GE provides enough consideration for climate change.

2. SKEO provided the following comment: The Upland Disposal Facility is appropriately addressed under separate documents. The Conceptual RD/RA WP provides estimates of sediment/soil removal volumes; however, it is difficult to determine if conservative estimation factors (such as a soil fluff factor resulting from excavation of dirt) were applied. In addition, it would be useful for the Conceptual RD/RA WP to mention whether the total (conservative) estimates of sediment/soil removal volumes can be addressed by the UDF capacity.

The town would like documentation to show that the estimates for managed sediment/soil waste have been conservatively estimated and can be accommodated by the UDF capacity. The town also requests clarity on where the dewatering will be conducted (on-site vs. UDF) and on the method of treatment/management of wastewater.

R. Christopher Brittain,  
Town Administrator

CC:

His Excellency Joseph Biden, President of the United States

The Honorable Edward Markey, U.S. Senate

The Honorable Elizabeth Warren, U.S. Senate

The Honorable Richard Neal, U.S. House of Representatives

Her Excellency Maura Healey, Governor of Massachusetts

The Honorable Paul Mark, State Senator

The Honorable William "Smitty" Pignatelli, State Representative, 3rd Berkshire  
Select Board, Town of Lee