

R. Christopher Brittain Town Administrator

TO: EPA/GE

FROM: Town of Lee DATE: July 12, 2023

RE: Preliminary Comments to PCB Transportation Plans

The Town of Lee would like to submit the following preliminary comments regarding the draft PCB transportation plans presented by General Electric on June 27, 2023.

- 1. We request that the public comment period for this plan be extended to 120 days.
- 2. The Town would like more details and clarification on the number of trips required for material that will be brought to an out of state facility. Specifically, we request a breakdown of the average number of trips per day for each reach of the project (for example: Reach 5a will take 3 years and will average 10 trips per day to the Mass Pike).
- 3. The Town prohibits the use trucks for out of state transport on Main Street in Lee. Although Main Street is part of a numbered state route it is managed and maintained solely by the Town of Lee.
- 4. We request that the south end of Woodland Rd and all of Willow Hill Road be avoided for unnecessary truck transportation. This residential area will be greatly affected by the placement of the proposed UDF and limiting additional truck traffic to these residents is necessary.
- 5. The Town requests that all <u>out of state</u> transport be made by railroad. The list below contains locations of existing railroad sidings that could be used as a loading facility:
  - a. Lenox Dale Willow creek
  - b. Columbia Mill Lee

- c. Greylock Mill Lee
- d. Onyx Mill Lee
- e. Stockbridge Train Station Stockbridge
- d. Rising Mill Great Barrington
- e. Glendale Stockbridge
- f. Sheffield Adjacent to Fire Station

We consider locations a or b to be an ideal location for out of state loading of materials north of Lee and location e to be a potential location for materials south of Lee. The Town of Lee would also like to discuss further possibilities for the Columbia Mill area in a separate meeting.

- 6. If railroad is not the chosen method of transport for out of state materials the Town of Lee requests that all materials enter the Turnpike in West Stockbridge following the routes proposed in Attachment A of this document.
- 7. The Town requests further details on the hydraulic pumping system including the following specifications:
  - a. size and length of pipe
  - b. location of booster pumps
  - c. decibels of noise created by the equipment
  - d. ratio of solids to liquids
  - e. dewatering plan/locations

In addition, we would like to better understand the likelihood that the hydraulic pumping system will be the chosen method of transport and what the alternative trucking impacts would be if it is not utilized.

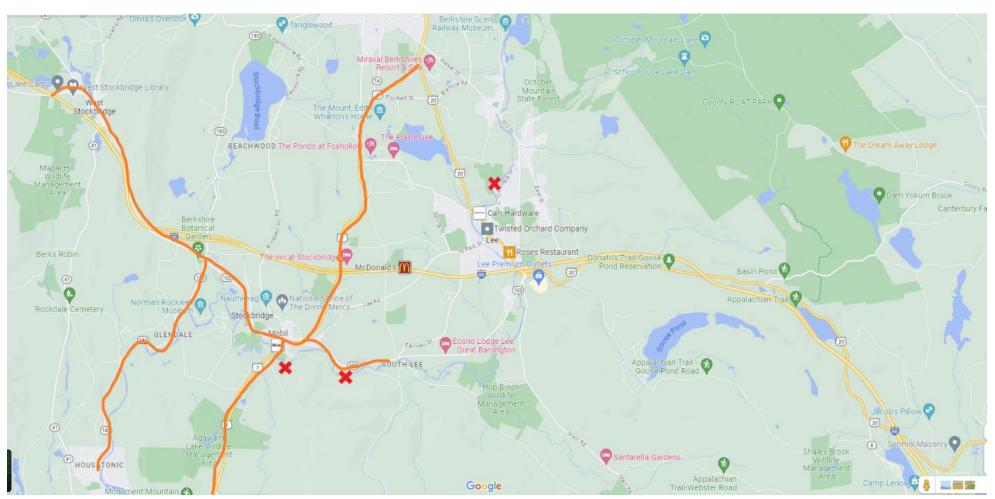
- 8. The Town would like to once again stress that the EPA consider the use of alternative treatment methods that would reduce the number of truck trips and overall capacity of the proposed UDF.
- 9. We also request any available dewatering locations that may coincide with transportations routes (not just for hydraulic dredging).

- 10. The GE presentation was made in a public meeting and needs to be entered into the record and made available to the public. We request that the slides be provided to the town as soon as possible.
- 11. The maps that were provided do not have street names for all roads. Can the maps be shown in layers on a Google map so we can view adjacent streets?
- 13. In the chart provided by EPA, it says "Lenox and Lee (Reach 5C excluding Woods Pond)" 30%. We request that the EPA and/or GE break this out separately for Lee and Lenox.

## ATTACHMENT A – Trucking Routes

Town of Lee, MA - Proposed Truck Routes of Out of State PCB Transport

NOTE: West Stockbridge entrance to route 90 would require a special access point (or service entrance) for west bound traffic OR Route 90 could be accessed at B3 (New York)



**KEY:** ORANGE LINES: Potential truck routes

RED "X" Location of railroad sidings