### **Site Environmental Impacts**

Proposed Lee Bike Path Lee, Massachusetts February 13, 2017

#### Site Description

The Site is the approximately 0.9-mile long section of a proposed fourteen-foot-wide Bike Path beginning at the south side of the bridge over the Housatonic River on West Park Street to Park Street and extending along the river southeast to the Big Y located south of the Massachusetts Turnpike (MassPike). The proposed bike path transects approximately 13 properties used for residential, commercial and recreational purposes. Most portions of the proposed bike path are located in wooded portions of the properties. The proposed alignment of the bike path crosses undeveloped portions of the commercial and residential properties and it is located approximately ten to 160 feet to the east of the Housatonic River (in areas north of the MassPike).

#### Site History

Historic aerial photographs (from 1942 through 2014) and topographic maps (from 1888 through 2012) were reviewed for the vicinity of the Site. These images indicated that development along Park Street, Housatonic Street and Pleasant Street was concentrated close to the roadways. Over time those areas because more densely developed along the roadways. There were no streets or buildings observed along the riverfront, in the vicinity of the proposed bike path.

#### Regulatory Review

A review of Massachusetts Department of Environmental Protection (MassDEP) files identified 19 reported releases at eleven properties along Park Street, Housatonic Street and Pleasant Street (see attached sketch). Each of these documented releases of oil or hazardous material were reviewed. Based on a limited review, none of the identified MassDEP releases are likely to impact Site soils likely to be excavated during construction, other than the polychlorinated biphenyl (PCB) matter described below.

A review of federal Environmental Protection Agency (EPA) documents indicated the Site is located within the "Rest of River" portion of the Housatonic River and river floodplain impacted with PCBs from Historic General Electric (GE) operations in Pittsfield, Massachusetts. Available information about this was reviewed and in 2002 EPA collected and analyzed hundreds of samples from areas along the Housatonic River.

Approximately 45 soil samples were collected by EPA from the upper 18" of soil collected from 24 locations within approximately 25 feet of the centerline of the proposed bike path. These samples are summarized on the attached Table 1. As indicated in the Table, PCB concentrations ranged from below laboratory detection limits (<0.5 milligrams per kilogram (mg/kg)) up to 11.85 mg/kg with an average total PCB concentration of approximately 3.5 mg/kg.

Although soils are impacted with PCBs, impacts are not classified as a hazardous waste or Toxic Substances Control Act (TSCA) wastes. As such, this material is suitable for disposal at certain permitted out-of-state landfills. In our experience, soils similar to this have been

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transported under a Bill of Lading to and disposed of as a solid waste at Turnkey a Waste Management Landfill located in Rochester, New Hampshire. Additional characterization data will be required to confirm there are no other impacts to the soil outside of the landfill acceptance criteria.

Table 1
Soil Analytical Results
Total Polychlorinated Biphenyls (PCBs)
Concentrations in mg/kg

# Samples Collected within 25' of Centerline of the Proposed Lee Bike Path Lee, Massachusetts

Sample ID	Depth (Feet)	Total PCB
S-3	0-0.5	<0.5
	0.5-1	<0.5
S-4	0-0.5	<0.5
	0.5-1	<0.5
S-6	0-0.5	0.37
	0.5-1	<0.5
S-9	0-0.5	1.48
	0.5-1	<0.5
S-13	0-0.5	2.36
	0.5-1	0.59
S-14	0-0.5	1.6
	0.5-1	1.2
S-15*	0-0.5	2.4
	0.5-1	3.5
S-16	0-0.5	1.92
	0.5-1	0.83
S-17	0-0.5	1.41
	0.5-1	<0.5
S-21	0-0.5	1.03
	0.5-1	3.07
S-22	0-0.5	3.81
	0.5-1	7.71
S-23	0-0.5	0.48
S-24	0-0.5	1.07
	0.5-1	0.34
Method 1 S-1 Soil Standard		1
Method 1 S-2/3 Soil Standard		4

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Sample ID	Depth (Feet)	Total PCB
S-25	0-0.5	11.7
	0.5-1	8.14
S-26	0-0.5	0.76
S-27*	0-0.5	11.85
	0.5-1	8.39
S-28	0-0.5	0.70
	1-1.5	0.89
	2-2.5	<0.5
S-29	0-0.5	1.1
	1-1.5	2.06
	2-2.5	0.53
S-30	0-0.5	8.81
	1-1.5	11.4
	2-2.5	3.62
S-31	0-0.5	7.9
	0.5-1	8.27
S-33	0-0.5	4.7
S-34	0-0.5	0.39
	0.5-1	0.40
S-36	0-0.5	4.6
S-38	0-0.5	1.4
	0.5-1	1.6
Overall Average Concentration		3.47
0-0.5 ft Average Concentration		3.27
0.5-1.0 ft Average Concentration		3.67
Method 1 S-1 Soil Standard		1
Method 1 S-2/3 Soil Standard		4

#### Notes

1. PCB sampling was conducted in 2002 by EPA personnel for Housatonic River "Rest of River" Assessment.