

**Table GC10-1: Ecological Inventory Parameters**

**Response to EPA's Interim Comments on CMS Report, Housatonic River – Rest of River  
General Electric Company – Pittsfield, MA**

<b>General Data/Landscape Variables</b>	
<ol style="list-style-type: none"> <li>1. Size of Area</li> <li>2. Landscape Context/Connectivity/Juxtaposition</li> <li>3. Regional Scarcity/Uniqueness</li> <li>4. Watershed Land Use Conditions</li> <li>5. Rosgen Level I Classification</li> <li>6. Topographic Data</li> </ol>	
<b>Community Cover Types</b> (List all that apply, plus aerial extent)	
<b>Uplands</b>	<ol style="list-style-type: none"> <li>1. Agricultural fields</li> <li>2. Cultural Grasslands</li> <li>3. Northern Hardwoods-Hemlock-White Pine Forest</li> <li>4. Red Oak-Sugar Maple Transition Forest</li> <li>5. Rich Mesic Forest</li> <li>6. Successional Northern Hardwood Forest</li> </ol>
<b>Wetlands</b>	<ol style="list-style-type: none"> <li>1. Wet Meadow</li> <li>2. Shallow Emergent Marsh</li> <li>3. Deep Emergent Marsh/Backwater</li> <li>4. Shrub Swamp</li> <li>5. Calcareous Seepage Swamp</li> <li>6. Transitional Floodplain Forest</li> <li>7. Red Maple Swamp High Terrace Floodplain Forest</li> <li>8. High Gradient Stream</li> <li>9. Medium Gradient Stream</li> <li>10. Low Gradient Stream</li> <li>11. Moderately Alkaline Pond (or Impoundment)</li> <li>12. Riverine Point Bar/Beach</li> <li>13. Other: e.g., Vernal Pools</li> </ol>
<b>Predominant Riverine and Streambank Conditions</b>	
<ol style="list-style-type: none"> <li>1. Rosgen Level II Data Collection</li> <li>2. River Width and Depth: average and range</li> <li>3. Flow Velocity: average and range</li> <li>4. % Pools, % Riffles, %Runs, % Embeddedness of Cobble</li> <li>5. Sediment Type: dominant and subordinate</li> <li>6. Boulder abundance, size, dispersal</li> <li>7. Woody Debris: abundance, size, emergent vs submergent,</li> <li>8. Bank Physical Status: stability, slope, sediment types, undercutting, etc</li> <li>9. Bank Habitat: burrows, nesting sites, vegetative cover, overhanging trees, woody debris, rocks</li> <li>10. Aquatic plants: species, relative abundance and cover</li> <li>11. Fisheries and Shellfish: species, relative abundance</li> <li>12. Aquatic Macroinvertebrates: species, relative abundance</li> <li>13. Water Quality Characterization</li> <li>14. Special Habitats: mud flats; beaches; point bars</li> </ol>	

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<b><i>Riparian/Floodplain Zone Conditions</i></b> (Data for Each Community Type)	
<b><i>Hydrology</i></b>	<ol style="list-style-type: none"> <li>1. Water Regime: Cowardin classification</li> <li>2. Frequency of Overbank Flooding: return interval</li> <li>3. Water Level Conditions: Fluctuation and Mean Level</li> <li>4. Piezometer Data</li> <li>5. Relationship of Surface Elevation to Regional Piezometric Surface Elevation</li> <li>6. Ratio of Wetland Area to Watershed Area</li> <li>7. Evidence of Seeps and Springs</li> <li>8. Inlet/Outlet Conditions/Controls</li> </ol>
<b><i>Soils</i></b>	<ol style="list-style-type: none"> <li>1. Soil Profile Description</li> <li>2. Classification</li> <li>3. Microrelief</li> <li>4. Engineering characteristics, erodibility, etc</li> </ol>
<b><i>Plant Community</i></b>	<ol style="list-style-type: none"> <li>1. Species by Community Type and Strata</li> <li>2. Vegetative Density/Relative Dominance by Strata</li> <li>3. Vegetative Interspersion</li> <li>4. Tree Foliage % Cover and Size/Density of Trees</li> <li>5. Proportion of Wildlife Food Plants</li> <li>6. Standing Dead Trees/Wolf Trees</li> <li>7. Tree Cavities</li> </ol>
<b><i>Special Habitat Considerations</i></b>	<ol style="list-style-type: none"> <li>1. Rare Species: assess habitat suitability, records, etc.</li> <li>2. Vernal Pools: size, hydrology, flora &amp; fauna, soils, surrounding habitat, relationship to other pools, etc.</li> <li>3. Other</li> </ol>
<b><i>Wildlife</i></b>	<ol style="list-style-type: none"> <li>1. Species habitat suitability</li> <li>2. Species observed</li> </ol>

**Table GC10-3: BMP Summary Table**

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<b>BMP Type</b>	<b>Application(s)</b>	<b>Description</b>	<b>Limitations/Notes</b>
Minimization of access road width	Avoid/minimize overall impacts	Construction access roads in cross-country settings can create significant disturbances. Keeping the width of such roads to 15-20 feet will generally allow for safe passage of heavy equipment while minimizing physical impacts to soils and vegetation.	Uneven topography can provide challenges that require additional material. Pull-offs need to be provided at regular intervals to allow construction vehicles to travel in opposite directions, which will effectively double the width of roads in certain areas.
Swamp/timber mats, plywood sheets, AlturnaMATS®	Wetland/stream crossings	Timber mats are typically 12” x12” timbers bolted connected together to form single mats; usually 6-8 feet wide and 16-20 feet long; used for wetland crossings in order to minimize rutting caused by heavy machinery. Plywood sheets can be lain down in succession to allow for small vehicles with rubber tires or rubberized tracks to pass through wetlands with minimal damage. AlturnaMats are light-weight, easy to handle, half-inch thick polyethylene slip-resistant ground protection devices. They are available in dimensions up to 4 feet by 8 feet and generally weigh less than 100 pounds, therefore can be moved without heavy machinery.	Timber mats need to be installed using heavy machinery and their availability can be limited for large projects. Plywood sheets are only to be used for very small vehicles. AlturnaMats will only work for smaller to moderately-sized mechanical equipment.
Poled fords	Stream crossings	Used for perpendicular crossings with shallow water depths, stable stream bottoms, and if an historic access road exists or the crossing is at a narrow reach of the stream/wetland.	Poled fords should not be used to cross previously undisturbed streams and banks.
Rubberized tracks, wide tires, lightweight equipment, low ground pressure equipment	Minimize rutting and soil compaction	Equipment with rubberized tracks spreads the weight of vehicle equipment over a much larger surface, reducing ground pressure and enabling the vehicle to move more freely through wet, unstable substrates. Reduces rutting, soil scarification, and soil compaction in sensitive areas. For work within sensitive areas, such as wetlands, increasing the width of tires will increase traveling surface area and therefore reduce the amount of ground pressure exerted by the equipment. Reduces rutting and soil compaction as improves maneuvering of the vehicle. Impacts can be lessened by reducing the size of equipment used. This will reduce the amount of pressure to the travel surface as well as the necessary width of access ways and staging areas. Smaller, lighter equipment will minimize soil compaction, rutting, and overall disturbance. Using equipment that reduces the pressure it exerts on the ground can minimize impacts to sensitive areas. Equipment with a ground pressure of less than 3 pounds per square inch (psi) for work in wetlands/sensitive areas can help minimize soil compaction and rutting.	Rubberized tracks are not compatible with certain pieces of machinery. Wide tires may be costly and will require a wider travel surface area. Lightweight vehicles may only work for select elements of construction that don’t require larger, heavy equipment.
Long-reach excavators	Minimization of bank and aquatic habitat disturbance	These have buckets attached to a long arm, increasing the reaching ability of the equipment, allowing the equipment to be situated farther away from work, minimizing travel distance through undisturbed or unstable soils. Long-reach excavators can preclude the need to drive into a sensitive area to perform work if a stable staging area can be provided close by.	These vehicles generally require very long swing radii for the arms, which could necessitate additional and significant tree clearing in non-target remedial areas.
Straw-based materials for erosion control (e.g. hay bales, straw bales, straw wattles)	Erosion control; mulch for exposed soils	Hay bales are generally used for erosion control purposes. When used to protect areas from erosion, they are intended to slow the velocity of flows and trap sediments behind them, preventing siltation of sensitive areas; most specifically downgradient areas with open and/or flowing water. Straw bales are often favored over hay bales for use as erosion control barriers and mulch because they are composed of the dried stalks left over after a grain is harvested and they do not contain the plant’s seeds. Therefore, they will not spread growth of unwanted species. Straw wattles are constructed from a biodegradable netting sock stuffed with straw and are used as an erosion control device at unstable sites. Since they are biodegradable, they may also be left in place once construction is complete.	Hay bales can be difficult to install under frozen conditions, and can generally only be used for 6-12 months before needing replacement. Straw bales are generally more expensive than hay bales and availability can be limited in the Northeast. Straw wattles are not generally intended for steep slopes, but rather, to stabilize low to moderate grades where there is a broad area of disturbance – they are not recommended for slopes greater than 3%. All these materials may be a hindrance to small animal movement.

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<b>BMP Type</b>	<b>Application(s)</b>	<b>Description</b>	<b>Limitations/Notes</b>
Silt fencing	Erosion control	Silt fencing is constructed of a permeable geotextile fabric secured by wooden stakes driven into the ground. It is installed as a temporary barrier to mark the limits of work and to prevent sediments from flowing into an unprotected and/or sensitive area from a disturbed site. Silt fence can also be used as a temporary barrier to keep small wildlife out of a work area. Once work is complete and soils are stabilized, silt fence materials (i.e., geotextile fabric and wooden stakes) should be removed and properly disposed off-site.	Silt fences pose a serious long-term obstacle to movement of smaller, more sensitive wildlife, as the material degrades very slowly. Frozen or rocky ground makes installation difficult.
Sheet piling, coffer dams, port-a-dams, silt curtains	In-water activities; siltation control; trench wall/bank stabilization	In-water activities require protection against sediments and debris from entering the water body. This is best achieved by installing in-water barriers surrounding the work area. Sheet piling, coffer dams (often sand-filled sacks), or silt curtains can provide a means of filtering sediments out of the water and can also serve as the limits of work, prohibiting aquatic organisms from entering the area. All barriers should be removed as soon as work activities are complete, as they can impede flows and limit aquatic animal movement.	All these devices fare poorly in waters with substantial velocity, unless they can be installed parallel to the flow. Port-a Dams are not usable in greater than 8' of water, and sand bag coffer dams do not work well in water greater than 2-4' in depth.
Erosion control blankets	Soil stabilization	Erosion control blankets are generally composed of biodegradable or synthetic materials. These blankets are used as a temporary or permanent aid to prevent erosion, stabilize soils, and protect seeds from foragers while vegetation is re-colonizing.	Erosion control blankets are not recommended for very steep (i.e. greater than 15%) slopes or on rocky soils.
Temporary swales and sediment basins	Stormwater management	Used to control stormwater and/or to dewater excavation areas. Swales usually consist of a ditch lined with rip rap, trap rock, erosion control blankets, or other materials and are used to intercept, redirect, and convey surface flows in order to prevent erosion prior to discharge. Temporary sediment basins allow sediment in runoff to be filtered out before water is released into wetlands or other unprotected and/or sensitive areas.	Adequate bottom stabilization of swales is needed to prevent scouring. Sediment basins need to be adequately sized based on expected rain events and contributing drainage area.
Coffer dams	Stream flow diversion	Coffer dams placed in a stream channel parallel to flows allow for diversion of flows such that one portion of the channel can be dewatered so stream bottom sediments may be removed.	Usually need to be used in conjunction with pumps to keep groundwater from discharging into the dried portion of the streambed/work area.
Water bars and check dams	Stormwater management	These measures control water velocities into and within temporary stormwater swales. Water bars are linear features constructed across an access way to redirect water flow off of the road surface to prevent erosion. They consist of a shallow trench just upgradient of a short berm and are installed at a downward sloping angle across the road. Check dams are typically constructed of rip rap or other stone material, while short-term check dams can be constructed of staked hay bales. These structures are placed across a swale to reduce velocities.	Water bars can impede vehicular movement and must be routinely maintained. Temporary check dams should be inspected at least once per week and within 24 hours of the end of heavy precipitation events.

**Table GC12-1 - Sediment Alternatives Revised OMM Program Components**

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Monitoring Programs/Components	Sediment Alternatives							
	SED 1	SED 2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8
100-year OMM								
Visual Inspection of Channel/Impoundment Cap/Backfill	NA	NA	Once in each of the following years in affected areas: Yrs 1, 2, 3, 4, 5, 10, 15, 25, 50, 75, 100					
Water Column	NA	Quarterly sampling at 12 locations along the Housatonic River in MA and CT (Yr 1, 2, 3, 4, 5, 10, 15, 25, 50, 75, 100)						
Fish	NA	Adult sampling at 8 locations (4 locations each in MA and CT) (Yr 1, 2, 3, 4, 5, 10, 15, 25, 50, 75, 100)						
Sediment	Sampling as specified below (Yr 5, 10, 15, 25, 50, 75, 100)							
MNR and Removal/Backfill Areas	NA	100 surface sediment samples	75 surface sediment samples	50 surface sediment samples	50 surface sediment samples	50 surface sediment samples	50 surface sediment samples	100 surface sediment samples
Removal/Cap Areas	NA	NA	1 core/4-5 acres 3 samples/core	1 core/4-5 acres 3 samples/core	1 core/4-5 acres 3 samples/core	1 core/4-5 acres 3 samples/core	1 core/4-5 acres 3 samples/core	NA
Cap Areas	NA	NA	NA	1 core/4-5 acres 3 samples/core	1 core/4-5 acres 3 samples/core	1 core/4-5 acres 3 samples/core	1 core/4-5 acres 3 samples/core	NA
Thin-Layer Cap Areas	NA	NA	1 core/4-5 acres 1 sample/core	1 core/4-5 acres 1 sample/core	1 core/4-5 acres 1 sample/core	1 core/4-5 acres 1 sample/core	1 core/4-5 acres 1 sample/core	NA
Total Cores (Per Year Sampled) <sup>1</sup>	0	100	110	110	120	130	110	100
Total Samples (Per Year Sampled)	0	100	130	180	210	240	210	100
Biota Consumption Advisories	NA	Maintain signs and conduct other outreach efforts in MA and CT every other year for up to 100 years as necessary						

**Notes:**

1. Total number of sediment cores and samples estimated based on 4 cores/acre, with numbers rounded to the nearest ten.

NA = not applicable

**Table GC13-1. Summary of removal volumes, areas, costs, and PCB load reductions under all SED alternatives.**

Category		SED 1	SED 2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8
Remediation Summary <sup>1</sup>	Total Sediment Removal Volume (cy)	0	0	134,000	262,000	377,000	521,000	770,000	2,252,000
	Total Bank Removal Volume (cy)	0	0	33,000	33,000	33,000	33,000	33,000	33,000
	Total Removal Volume for Alternative (cy)	0	0	167,000	295,000	410,000	554,000	803,000	2,285,000
	Total Sediment Removal Area (acres)	0	0	42	91	126	178	219	351
	Total Thin-layer Cap Area (acres)	0	0	97	119	102	112	72	0
	Total Engineered Cap Only Area (acres)	0	0	0	37	60	45	45	0
	Years to Implement	0	0	10	15	19	21	26	52
Cost (M) <sup>2</sup>	Total Capital Cost	\$0	\$0	\$137 M	\$213 M	\$257 M	\$314 M	\$377 M	\$676 M
	OMM Cost	\$0	\$7.8 M	\$10.9 M	\$11.1 M	\$11.3 M	\$11.6 M	\$11.4 M	\$10.9 M
	Total Cost of Alternative	\$0	\$7.8 M	\$148 M	\$224 M	\$268 M	\$325 M	\$389 M	\$687 M
Percent Reduction in Current Annual PCB Load	Woods Pond Dam	37%	37%	94%	96%	97%	97%	97%	98%
	Rising Pond Dam	41%	41%	87%	89%	93%	95%	95%	97%
	Reach 5/6 Floodplain	50%	50%	97%	97%	98%	98%	98%	99%

*Notes:*

<sup>1</sup> Values presented in this table for SED 6, SED 7, and SED 8 reflect additional remediation in Reaches 7B and 7C, as discussed in Response to Specific Comment 44.

<sup>2</sup> Cost estimates presented in this table have been updated from those presented in CMS Report based on EPA's comments on the prior cost estimates.

**Table GC13-2a. Summary of reach-specific metrics for evaluating all SED alternatives (remediation summary).**

Reach	Remediation Summary <sup>1</sup>																												
	Sediment Removal Volume (cy)							Sediment Removal Area (acres)							Thin-Layer Cap Area (acres)							Engineered Cap Area Only (acres)							
	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	
5A	0	134,000	134,000	134,000	134,000	218,000	268,000	0	42	42	42	42	42	42	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
5B	0	0	39,000	88,000	88,000	109,000	153,000	0	0	12	27	27	27	27	0	0	15	0	0	0	0	0	0	0	0	0	0	0	
5C	0	0	0	66,000	186,000	186,000	279,000	0	0	0	20	57	57	57	0	0	20	0	0	0	0	0	0	0	0	0	0	0	
5D	0	0	0	0	24,000	51,000	388,000	0	0	0	0	15	32	86	0	37	61	61	55	39	0	0	0	0	0	0	0	0	
6 (WP)	0	0	89,000	89,000	89,000	148,000	575,000	0	0	37	37	37	37	60	0	60	23	0	0	0	0	0	0	0	0	23	23	23	0
7A	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7B	0	0	0	0	0	12,000	32,000	0	0	0	0	0	5	10	0	0	0	0	10	5	0	0	0	0	0	0	0	0	0
7C	0	0	0	0	0	7,000	25,000	0	0	0	0	0	3	8	0	0	0	0	8	5	0	0	0	0	0	0	0	0	0
7D	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7E	0	0	0	0	0	9,000	25,000	0	0	0	0	0	4	8	0	0	0	0	8	4	0	0	0	0	0	0	0	0	0
7F	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
7G	0	0	0	0	0	15,000	39,000	0	0	0	0	0	6	12	0	0	0	0	12	6	0	0	0	0	0	0	0	0	0
7H	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
8 (RP)	0	0	0	0	0	15,000	468,000	0	0	0	0	0	6	41	0	0	0	41	19	13	0	0	0	0	0	22	22	0	0
BBD	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LL	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LZ	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LH	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Note: \_\_\_\_\_

<sup>1</sup> Values presented in this table for SED 6, SED 7, and SED 8 reflect additional remediation in Reaches 7B and 7C, as discussed in Response to Specific Comment 44.

**Table GC13-2b. Summary of reach-specific metrics for evaluating all SED alternatives (model-predicted endpoint PCB concentrations).**

Reach	Model-Predicted Endpoint PCB Concentrations <sup>1</sup>																											
	Average Surface Water (ng/L)							Average Surface Sediment (0-6") (mg/kg)							Average Fish (whole body) (mg/kg)							Average Fish (fillet) (mg/kg)						
	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8
5A	9.0	2.6	2.5	2.5	2.5	2.9	1.8	13	0.058	0.061	0.060	0.058	0.096	0.087	36	1.3	1.3	1.3	1.3	1.5	0.86	7.3	0.25	0.26	0.26	0.26	0.29	0.17
5B	44	3.0	1.8	1.8	1.9	1.9	1.2	7.0	5.5	0.39	0.062	0.057	0.056	0.050	47	15	1.9	1.2	1.1	1.2	0.75	9.3	3.0	0.39	0.23	0.22	0.25	0.15
5C	34	4.0	1.6	1.2	1.3	1.5	0.93	20	3.0	0.44	0.14	0.18	0.16	0.12	37	9.1	2.1	0.84	0.82	0.89	0.55	7.4	1.8	0.42	0.17	0.16	0.11	
5D	---							17	15	0.34	0.31	0.21	0.20	0.11	48	31	2.0	1.8	1.8	1.9	1.4	9.5	6.3	0.40	0.36	0.35	0.39	0.29
6 (WP)	33	4.4	1.5	1.2	1.2	1.4	0.86	16	1.5	0.25	0.24	0.21	0.22	0.16	43	3.6	1.1	0.89	0.87	1.0	0.63	8.6	0.71	0.23	0.18	0.17	0.19	0.13
7A	---							0.43	0.41	0.41	0.41	0.41	0.41	0.41	32	6.3	2.5	2.1	2.0	2.1	1.7	6.4	1.3	0.50	0.42	0.40	0.42	0.34
7B	28	4.0	1.5	1.2	1.1	1.2	0.75	4.2	3.9	4.0	4.0	0.92	0.22	0.044	29	11	8.2	7.9	2.1	1.1	0.51	5.7	2.1	1.6	1.6	0.41	0.23	0.10
7C	---							4.1	4.0	4.0	4.0	0.092	0.062	0.048	32	8.9	5.6	5.2	1.0	1.0	0.61	6.3	1.8	1.1	1.0	0.20	0.20	0.12
7D	---							1.4	0.92	0.94	0.94	0.91	0.93	0.87	27	6.8	4.2	3.9	3.5	3.7	3.2	5.5	1.4	0.84	0.79	0.70	0.75	0.63
7E	15	2.2	1.0	0.92	0.82	1.0	0.75	1.2	1.2	1.3	1.3	0.44	0.29	0.014	21	5.1	3.1	2.9	1.7	1.7	0.89	4.1	1.0	0.62	0.57	0.34	0.33	0.18
7F	---							0.7	0.61	0.61	0.61	0.59	0.60	0.55	16	4.1	2.6	2.4	2.3	2.3	1.9	3.2	0.82	0.52	0.49	0.45	0.46	0.39
7G	14	2.1	1.1	1.0	0.88	1.1	0.82	5.1	4.7	5.0	5.0	1.4	1.1	0.044	18	6.4	5.3	5.1	2.0	1.7	0.77	3.5	1.3	1.1	1.0	0.40	0.35	0.15
7H	---							0.40	0.40	0.40	0.40	0.40	0.40	0.39	14	3.6	2.3	2.2	2.0	2.0	1.7	2.8	0.72	0.46	0.43	0.39	0.40	0.35
8 (RP)	13	2.3	1.4	1.0	0.87	1.1	0.81	2.9	2.7	2.7	0.35	0.13	0.031	0.070	18	7.9	6.5	1.7	1.1	1.0	0.86	3.6	1.6	1.3	0.34	0.22	0.20	0.17
BBD	1.3	0.2	0.1	0.1	0.09	0.1	0.08	0.08	0.02	0.01	0.008	0.006	0.006	0.005	0.8	0.2	0.1	0.07	0.05	0.05	0.04	0.2	0.04	0.02	0.01	0.009	0.009	0.007
LL	1.0	0.2	0.1	0.07	0.06	0.08	0.06	0.06	0.01	0.008	0.006	0.004	0.004	0.003	0.6	0.1	0.08	0.05	0.03	0.04	0.03	0.1	0.03	0.02	0.009	0.006	0.007	0.005
LZ	0.7	0.1	0.07	0.05	0.04	0.06	0.04	0.04	0.009	0.006	0.004	0.003	0.003	0.002	0.4	0.10	0.06	0.03	0.03	0.03	0.02	0.08	0.02	0.01	0.006	0.005	0.005	0.004
LH	0.6	0.1	0.07	0.05	0.04	0.05	0.04	0.04	0.009	0.005	0.004	0.003	0.003	0.002	0.4	0.09	0.05	0.03	0.02	0.02	0.02	0.08	0.02	0.01	0.006	0.004	0.004	0.003

Notes: \_\_\_\_\_

<sup>1</sup> Results presented in this table for SED 6, SED 7, and SED 8 reflect new downstream model simulations which have been revised from those presented in the CMS Report to assume remediation of more grid cells in Reaches 7B and 7C, as discussed in Response to Specific Comment 44.

<sup>2</sup> Results for CT impoundments are highly uncertain as they were estimated from the CT 1-D Analysis.



**Table GC13-2c. Summary of reach-specific metrics for evaluating all SED alternatives (attainment of ambient water quality criteria at end of model projections).**

Reach (Location)	Attainment of Ambient Water Quality Criteria at End of Model Projections <sup>1</sup>																					
	# Exceedances of Freshwater Chronic Aquatic Life Criterion (0.014 µg/L) <sup>2,3</sup>							Exceeds Federal and MA human health Consumption Criterion (0.064 ng/L) <sup>3</sup>							Exceeds Connecticut Consumption Criterion (0.17 ng/L) <sup>3</sup>							
	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	
5A (Holmes Road)	29	0	0	0	0	2	1	X	X	X	X	X	X	X								
5B (New Lenox Road)	274	0	0	0	0	1	0	X	X	X	X	X	X	X								
5C (WP Headwaters)	274	0	1	0	0	0	0	X	X	X	X	X	X	X								
6 (Woods Pond Dam)	274	0	0	0	0	0	0	X	X	X	X	X	X	X								
7B (Columbia Mill Dam)	274	0	1	0	0	0	0	X	X	X	X	X	X	X								
7E (Willow Mill Dam)	150	0	1	0	0	0	0	X	X	X	X	X	X	X								
7G (Glendale Dam)	72	1	1	1	0	0	0	X	X	X	X	X	X	X								
8 (Rising Pond Dam)	60	1	1	1	0	0	0	X	X	X	X	X	X	X								
Bulls Bridge	0	0	0	0	0	0	0	X	X	X	X	X	X	X	X	X						
Lake Lillinonah	0	0	0	0	0	0	0	X	X	X	X		X		X	X						
Lake Zoar	0	0	0	0	0	0	0	X	X	X					X							
Lake Housatonic	0	0	0	0	0	0	0	X	X	X					X							

**Notes:**

<sup>1</sup> Daily average water column PCB concentrations are not included in the timeseries output generated by the EPA model for Reaches 5D, 7A, 7C, 7D, 7F, and 7H; therefore no comparison of model-predicted water column PCB levels to the relevant water quality criteria has been performed in these reaches. Also, results presented in this table for SED 6, SED 7, and SED 8 reflect new downstream model simulations which have been revised from those presented in the CMS Report to assume remediation of more grid cells in Reaches 7B and 7C, as discussed in Response to Specific Comment 44.

<sup>2</sup> This criterion is a 4-day average not to be exceeded more than once every three years. Number of exceedances shown is the number of values exceeding 0.014 µg/L predicted to occur in the last three years of the model projection, based on use of 4-day block average concentrations. As discussed in Response to Specific Comment 62, GE believes that use of block averages is more appropriate than use of running average concentrations for assessing achievement of this criterion, given the dominant influence of individual high-flow events on the four-day averages and the fact that the criterion permits one allowable exceedance. However, the numbers of exceedances using the rolling average method are also presented in that response.

<sup>3</sup> Results for CT impoundments are highly uncertain as they were estimated from the CT 1-D Analysis.

**Table GC13-2d. Summary of reach-specific metrics for evaluating all SED alternatives (percent reduction in fish PCB concentration at the end of model projections and PCB mass removed).**

Reach	Other Metrics <sup>1</sup>													
	Percent Reduction in Fish Tissue PCB Concentration at End of Model Projections <sup>2</sup>							PCB Mass Removed (pounds)						
	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8
5A	60%	99%	99%	99%	99%	98%	99%	0	10,300	10,300	10,300	10,300	14,400	19,000
5B	47%	83%	98%	99%	99%	99%	99%	0	0	700	1,300	1,300	1,700	2,200
5C	48%	87%	97%	99%	99%	99%	99%	0	0	0	1,700	5,700	5,600	7,600
5D	57%	72%	98%	98%	98%	98%	99%	0	0	0	0	100	2,900	5,700
6 (WP)	44%	95%	99%	99%	99%	99%	99%	0	0	4,000	3,900	3,800	5,200	13,300
7A	52%	91%	96%	97%	97%	97%	97%	0	0	0	0	0	0	0
7B	48%	81%	85%	86%	96%	98%	99%	0	0	0	0	0	180	270
7C	50%	86%	91%	92%	98%	98%	99%	0	0	0	0	0	180	200
7D	51%	88%	93%	93%	94%	93%	94%	0	0	0	0	0	0	0
7E	54%	89%	93%	94%	96%	96%	98%	0	0	0	0	0	20	60
7F	63%	91%	94%	94%	95%	95%	96%	0	0	0	0	0	0	0
7G	45%	80%	83%	84%	94%	95%	98%	0	0	0	0	0	140	360
7H	60%	90%	93%	94%	94%	94%	95%	0	0	0	0	0	0	0
8 (RP)	43%	75%	79%	95%	97%	97%	97%	0	0	0	0	0	260	4,900
BBD	60%	91%	95%	97%	98%	98%	98%	0	0	0	0	0	0	0
LL	60%	90%	95%	97%	98%	97%	98%	0	0	0	0	0	0	0
LZ	60%	90%	94%	97%	97%	97%	98%	0	0	0	0	0	0	0
LH	60%	90%	95%	97%	98%	98%	98%	0	0	0	0	0	0	0

Notes:

<sup>1</sup> Results presented in this table for SED 6, SED 7, and SED 8 reflect new downstream model simulations which have been revised from those presented in the CMS Report to assume remediation of more grid cells in Reaches 7B and 7C, as discussed in Response to Specific Comment 44.

<sup>2</sup> Results for CT impoundments are highly uncertain as they were estimated from the CT 1-D Analysis.

**Table GC13-3a. Summary of adverse impacts on habitat for all SED alternatives.**

Category			SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8
Number of State-listed Rare Species that would be "Taken"			0	18	19	19	19	19	19
Number of State-listed Rare Species where Alternative Would Impact Significant Portion of Local Population			0	13	16	16	16	16	16
Total Acres of Impacted NHESP Priority Habitat of Rare Species <sup>1</sup>			0	213	329	333	336	337	352
Total Acres of Impacted NHESP Estimated Habitat of Rare Wildlife <sup>1</sup>			0	199	316	320	323	324	339
Summary of Affected Habitat Area (acres) from Sediment Remediation		Riverine	0	139	186	227	265	265	265
		Backwater	0	0	61	61	70	71	86
		<b>Total</b>	<b>0</b>	<b>139</b>	<b>247</b>	<b>288</b>	<b>335</b>	<b>336</b>	<b>351</b>
Summary of Affected Floodplain Habitat Area (acres) from Construction of Staging Areas and Access Roads <sup>2</sup>	Upland	Open Field	0	9	9	9	9	9	9
		Upland Forest	0	4	5	5	3	3	3
		<b>Total</b>	<b>0</b>	<b>14</b>	<b>14</b>	<b>14</b>	<b>12</b>	<b>12</b>	<b>12</b>
	Wetland	Wetland Forest	0	26	30	30	30	30	30
		Emergant Wetland	0	3	4	4	3	3	3
		Shrub Swamp	0	4	5	5	4	4	4
		Vernal Pool	0	7	7	7	7	7	7
	<b>Total</b>	<b>0</b>	<b>39</b>	<b>46</b>	<b>46</b>	<b>44</b>	<b>44</b>	<b>44</b>	

Notes:

<sup>1</sup> Acres of impacted NHESP habitat includes impacts resulting from both remediation and construction of staging areas and access roads. Area calculations assume a road width of 20 ft.

<sup>2</sup> This detailed breakdown of removal areas and volumes by habitat type was conducted using the ecological characterization of the Housatonic River between the Confluence and Woods Pond Dam performed by Woodlot Alternatives, Inc. on behalf of EPA (Woodlot, 2002). The Woodlot habitat community mapping is absent in some small portions of the PSA floodplain and in all of Reaches 7 and 8, and is therefore not included in this summary.

**Table GC13-3b. Summary of adverse impacts on habitat of State-listed rare species for all SED alternatives.**

Category		SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	Riverbank Remediation (linear feet)
Area (acres, except where otherwise noted) of State-listed Rare Species Habitat Impacted by Sediment Remediation and Construction of Staging Areas and Access Roads	Wood turtle	0	125	186	188	196	196	200	83,636
	Jefferson salamander	0	0	<1	<1	<1	<1	<1	0
	American bittern	0	118	225	229	225	225	241	46,205
	Bald eagle	0	22	75	75	62	62	72	0
	Common moorhen	0	77	151	153	145	145	158	1,665
	Water shrew	0	4	7	7	7	7	7	0
	American clam shrimp	0	0	0	0	0	0	0	0
	Arrow clubtail	0	128	240	243	238	238	252	83,636
	Brook snaketail	0	17	17	17	17	17	17	13,602
	Mustard white	0	93	128	129	134	134	137	69,905
	Riffle snaketail	0	33	36	36	36	36	36	23,059
	Triangle floater	0	39	41	41	41	41	41	28,237
	Zebra clubtail	0	126	235	239	231	231	245	83,636
	Bristly buttercup	0	15	15	15	16	16	16	9,340
	Bur oak	0	68	143	143	140	140	151	2,685
	Crooked-stem aster	0	3	4	4	7	7	7	1,401
	Culver's root	0	0	0	0	0	0	0	0
	Fen cuckoo flower	0	0	0	0	0	0	0	0
	Foxtail sedge	0	14	27	27	28	28	28	14,267
	Gray's sedge	0	9	37	37	34	34	42	0
	Hairy wild rye	0	19	19	19	19	19	19	10,058
	Hemlock parsley	0	0	0	0	0	0	0	0
	Intermediate spike-rush	0	66	98	99	100	100	103	55,235
	Long-styled sanicle	0	0	0	0	0	0	0	0
	Narrow-leaved spring beauty	0	5	11	11	11	11	11	6,110
	Straight-leaved pondweed	0	0	0	0	0	0	0	0
Wapato	0	146	253	257	254	254	269	74,536	
White adder's-mouth	0	0	0	0	2	2	0	0	





**Table GC13-6. Backwater sediment IMPGs for amphibians compared to projected sediment PCBs for all SED alternatives, including the time to achieve in years (in italics).**

Reach	Exposure Area <sup>1</sup>	Area (acres)	Average 0-6" Sediment PCB Concentration (mg/kg) <sup>2</sup>								IMPG Attainment							
			SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	Lower Bound IMPG (mg/kg)	Upper Bound IMPG (mg/kg)	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8
Small Backwaters (< 2 acres)	BWS_01	1.9	5.7	4.2	4.1	4.1	0.18	0.36	0.20	3.27	5.6	113 / 54	72 / 32	70 / 32	70 / 32	2 / 2	2 / 2	3 / 3
	BWS_02	1.8	5.9	5	0.14	0.14	0.14	0.29	0.16	3.27	5.6	109 / 57	99 / 38	3 / 3	3 / 3	3 / 3	3 / 3	4 / 4
	BWS_03	1.9	3.0	1.8	0.20	0.20	0.20	0.25	0.18	3.27	5.6	48 / 31	38 / 28	3 / 3	3 / 3	3 / 3	4 / 4	5 / 5
	BWS_04	0.30	23	22	0.087	0.087	0.12	0.24	0.19	3.27	5.6	> 250 / > 250	> 250 / > 250	3 / 3	3 / 3	3 / 3	4 / 4	5 / 5
	BWS_06	0.56	2.2	0.26	0.22	0.24	0.18	0.19	0.13	3.27	5.6	30 / 12	17 / 10	16 / 10	17 / 10	10 / 10	12 / 10	14 / 11
	BWS_07	0.12	5.4	5.4	5.4	5.4	0.030	0.027	0.11	3.27	5.6	> 250 / 4	> 250 / 4	> 250 / 4	> 250 / 4	10 / 4	12 / 4	14 / 14
	BWS_08	0.35	37	37	0.064	0.060	0.061	0.26	0.29	3.27	5.6	> 250 / > 250	> 250 / > 250	11 / 11	12 / 12	12 / 12	15 / 15	18 / 18
	BWS_09	0.28	19	19	0.11	0.098	0.098	0.17	0.21	3.27	5.6	> 250 / > 250	> 250 / > 250	11 / 11	13 / 13	13 / 13	16 / 16	18 / 18
	BWS_10	1.5	16	15	0.094	0.078	0.080	0.33	0.27	3.27	5.6	> 250 / > 250	> 250 / > 250	11 / 11	13 / 13	13 / 13	16 / 16	19 / 19
	BWS_11	0.11	2.1	0.14	0.18	0.12	0.13	0.13	0.093	3.27	5.6	10 / 5	7 / 5	7 / 5	7 / 5	7 / 5	7 / 5	8 / 5
	BWS_12	1.7	6.1	4.7	4.1	4.2	0.11	0.13	0.10	3.27	5.6	109 / 61	76 / 42	65 / 37	67 / 38	13 / 13	16 / 16	20 / 20
	BWS_13	0.37	10	9.2	8.9	8.9	0.11	0.17	0.10	3.27	5.6	> 250 / > 250	> 250 / > 250	> 250 / > 250	> 250 / > 250	13 / 13	16 / 16	20 / 20
	BWS_14	0.57	8.8	8.1	7.9	7.8	0.049	0.13	0.20	3.27	5.6	> 250 / 213	> 250 / 143	> 250 / 140	> 250 / 130	13 / 13	16 / 16	20 / 20
	BWS_15	0.90	8.9	6.7	5.5	5.6	0.10	0.14	0.12	3.27	5.6	167 / 107	116 / 69	86 / 51	86 / 52	13 / 13	16 / 16	21 / 21
	BWS_16	1.0	3.2	1.2	0.76	0.77	0.094	0.098	0.12	3.27	5.6	52 / 23	30 / 17	26 / 17	27 / 17	14 / 14	17 / 17	21 / 18
	BWS_17	0.58	2.4	0.44	0.35	0.27	0.11	0.11	0.088	3.27	5.6	32 / 6	14 / 5	14 / 5	15 / 5	14 / 5	16 / 5	16 / 6
	BWS_18	0.84	2.3	0.29	0.21	0.24	0.10	0.10	0.074	3.27	5.6	32 / 12	19 / 11	20 / 10	20 / 10	14 / 10	17 / 11	19 / 11
	BWS_19	0.99	20	20	0.089	0.074	0.072	0.15	0.11	3.27	5.6	> 250 / > 250	> 250 / > 250	11 / 11	14 / 14	14 / 14	17 / 17	23 / 23
	BWS_20	1.3	5.8	4.4	4.0	4.1	0.11	0.12	0.12	3.27	5.6	95 / 55	74 / 36	65 / 35	67 / 36	15 / 15	18 / 17	24 / 24
	Large Backwaters (> 2 acres)	BWL_01	2.1	11	11	0.11	0.11	1.5	1.6	0.15	3.27	5.6	180 / 124	166 / 115	8 / 8	8 / 8	8 / 8	10 / 10
BWL_02		5.5	5.7	4.2	3.7	3.9	0.11	0.16	0.14	3.27	5.6	97 / 54	66 / 35	57 / 32	60 / 32	12 / 12	15 / 15	17 / 17
BWL_03		2.4	3.6	2.2	1.9	1.8	0.096	0.11	0.10	3.27	5.6	58 / 25	37 / 16	33 / 16	33 / 16	13 / 13	16 / 16	19 / 18
BWL_04		2.1	4.4	2.4	1.8	1.9	0.12	0.19	0.14	3.27	5.6	81 / 32	38 / 26	32 / 25	34 / 26	14 / 14	16 / 16	21 / 21
BWL_05		12	14	12	0.23	0.22	0.25	0.19	0.11	3.27	5.6	200 / 146	147 / 108	11 / 11	14 / 14	14 / 14	17 / 17	23 / 23
BWL_07		22	20	19	0.20	0.17	0.18	0.21	0.11	3.27	5.6	> 250 / > 250	> 250 / 225	12 / 12	15 / 15	15 / 15	18 / 18	25 / 25
BWL_08		4.1	13	11	1.4	1.3	0.19	0.22	0.10	3.27	5.6	> 250 / 183	207 / 140	12 / 12	15 / 15	15 / 15	18 / 18	26 / 26
BWL_09		7.0	15	14	0.20	0.16	0.24	0.19	0.10	3.27	5.6	> 250 / 228	239 / 170	12 / 12	15 / 15	16 / 15	19 / 19	26 / 26
BWL_10		6.4	13	12	0.15	0.13	0.18	0.20	0.16	3.27	5.6	> 250 / 223	> 250 / 189	12 / 12	15 / 15	16 / 16	19 / 19	27 / 27
BWL_11		4.6	2.3	2.3	0.024	0.024	0.024	0.024	0.022	3.27	5.6	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0

Notes:

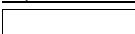


<sup>1</sup> Exposure areas represent individual backwaters

<sup>2</sup> Model endpoint concentrations after projection

IMPG = interim media protection goal

IT = Increasing trend in model extrapolation; no time-to-achieve estimated.

Key:

-  = post-remediation EPC is higher than Upper Bound IMPG
-  = post-remediation EPC is between Lower and Upper Bound IMPGs
-  = post-remediation EPC is below Lower Bound IMPG
- <value>/<value> = Time to achieve the lower bound and upper bound IMPG, respectively (years)
- <value> = time to achieve predicted by the model
- <value> = time to achieve based on highly uncertain extrapolation of the model results as described in Section 3.2.1 of the CMS Report

**Table GC13-7. Sediment IMPGs for benthic invertebrates compared to projected sediment PCBs for all SED alternatives, including the time to achieve in years (in italics).**

Reach	Exposure Area <sup>1</sup>	Average 0-6" Sediment PCB Concentration (mg/kg) <sup>2,3</sup>							IMPG Attainment								
		SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	Lower Bound IMPG (mg/kg)	Upper Bound IMPG (mg/kg)	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8
5A	R5A_01	1.9	0.33	0.33	0.33	0.33	0.17	0.11	3	10	46 / 1	1 / 1	1 / 1	1 / 1	1 / 1	1 / 1	1 / 1
	R5A_02	3.7	0.18	0.17	0.17	0.17	0.11	0.084	3	10	63 / 20	1 / 1	1 / 1	1 / 1	1 / 1	1 / 1	1 / 1
	R5A_03	6.4	0.12	0.14	0.13	0.14	0.37	0.23	3	10	67 / 40	2 / 2	2 / 2	2 / 2	2 / 2	27 / 2	2 / 2
	R5A_04	29	0.071	0.072	0.071	0.070	0.83	0.37	3	10	> 250 / > 250	2 / 2	2 / 2	2 / 2	2 / 2	3 / 2	3 / 3
	R5A_05	13	0.032	0.033	0.033	0.032	0.14	0.067	3	10	199 / 78	2 / 2	2 / 2	2 / 2	2 / 2	3 / 3	3 / 3
	R5A_06	7.7	0.043	0.048	0.044	0.045	0.067	0.28	3	10	IT / 12	3 / 2	3 / 2	3 / 2	3 / 2	4 / 3	4 / 3
	R5A_07	15	0.062	0.075	0.075	0.063	0.055	0.070	3	10	244 / 98	3 / 3	3 / 3	3 / 3	3 / 3	5 / 4	6 / 5
	R5A_08	17	0.028	0.023	0.024	0.023	0.026	0.021	3	10	> 250 / 133	4 / 4	4 / 4	4 / 4	4 / 4	5 / 5	6 / 6
	R5A_09	9.9	0.022	0.022	0.021	0.021	0.046	0.027	3	10	> 250 / 39	4 / 4	4 / 4	4 / 4	4 / 4	6 / 6	7 / 7
	R5A_10	16	0.020	0.020	0.020	0.020	0.028	0.022	3	10	> 250 / > 250	6 / 5	6 / 5	6 / 5	6 / 5	7 / 7	9 / 8
	R5A_11	18	0.023	0.026	0.026	0.022	0.029	0.026	3	10	> 250 / > 250	7 / 7	7 / 7	7 / 7	7 / 7	9 / 8	11 / 10
5B	R5B_01	9.6	9.1	0.044	0.043	0.035	0.034	0.030	3	10	> 250 / 28	> 250 / 21	9 / 8	9 / 8	9 / 8	11 / 10	13 / 12
	R5B_02	8.5	5.3	0.061	0.055	0.042	0.041	0.038	3	10	IT / 0	125 / 0	10 / 0	10 / 0	10 / 0	12 / 0	14 / 0
	R5B_03	4.7	3.2	1.1	0.058	0.060	0.066	0.050	3	10	204 / 0	61 / 0	10 / 0	10 / 0	10 / 0	12 / 0	15 / 0
	R5B_04	5.7	4.4	0.35	0.089	0.090	0.092	0.11	3	10	248 / 0	112 / 0	10 / 0	11 / 0	11 / 0	13 / 0	15 / 0
	R5B_05	5.6	3.9	0.54	0.075	0.072	0.069	0.057	3	10	115 / 0	80 / 0	10 / 0	12 / 0	12 / 0	14 / 0	16 / 0
5C	R5C_01	7.2	5.8	1.5	0.083	0.081	0.082	0.077	3	10	> 250 / 0	118 / 0	11 / 0	13 / 0	13 / 0	16 / 0	19 / 0
	R5C_02	8.0	6.4	0.11	0.12	0.12	0.12	0.090	3	10	> 250 / 8	148 / 6	11 / 6	13 / 6	13 / 6	16 / 6	20 / 7
	R5C_03	4.9	3.2	1.1	0.10	0.10	0.10	0.086	3	10	120 / 0	58 / 0	11 / 0	14 / 0	13 / 0	16 / 0	21 / 0
	R5C_04	6.1	4.4	0.10	0.11	0.12	0.12	0.088	3	10	132 / 8	79 / 6	11 / 6	14 / 6	14 / 6	17 / 7	22 / 7
	R5C_05	37	1.8	0.14	0.13	0.19	0.19	0.14	3	10	> 250 / > 250	8 / 8	12 / 11	14 / 14	14 / 14	17 / 17	24 / 23
	R5C_06	29	1.5	0.16	0.17	0.25	0.21	0.15	3	10	> 250 / 194	9 / 9	13 / 12	15 / 15	16 / 16	19 / 19	28 / 27
6	Woods Pond	16	1.5	0.25	0.24	0.21	0.22	0.16	3	10	210 / 97	10 / 10	15 / 14	18 / 17	18 / 18	22 / 21	37 / 33
7A		0.43	0.41	0.41	0.41	0.41	0.41	0.41	3	10	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0
7B		4.2	3.9	4.0	4.0	0.92	0.22	0.04	3	10	> 250 / 0	174 / 0	188 / 0	190 / 0	19 / 0	23 / 0	39 / 0
7C		4.1	4.0	4.0	4.0	0.092	0.062	0.048	3	10	> 250 / 0	> 250 / 0	> 250 / 0	> 250 / 0	19 / 0	24 / 0	40 / 0
7D		1.4	0.92	0.94	0.94	0.90	0.93	0.87	3	10	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0
7E		1.2	1.2	1.3	1.3	0.44	0.29	0.01	3	10	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0
7F		0.74	0.61	0.61	0.61	0.59	0.60	0.55	3	10	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0
7G		5.1	4.7	5.0	5.0	1.4	1.1	0.044	3	10	194 / 0	190 / 0	204 / 0	200 / 0	20 / 0	25 / 0	42 / 0
7H		0.40	0.39	0.40	0.40	0.40	0.40	0.39	3	10	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0	0 / 0
8	Rising Pond	2.9	2.7	2.7	0.35	0.13	0.031	0.070	3	10	21 / 0	25 / 0	17 / 0	17 / 0	20 / 0	17 / 0	26 / 0

Notes

<sup>1</sup> Exposure areas in Reach 5 represent EPA spatial bins (1/4 to 1/2-mile segments as defined in EPA's Model Validation Report)

<sup>2</sup> Model endpoint concentrations after projection

<sup>3</sup> Results presented in this table for SED 6, SED 7, and SED 8 reflect new downstream model simulations which have been revised from those presented in the CMS Report to assume remediation of more grid cells in Reaches 7B and 7C, as discussed in Response to Specific Comment 44.

IMPG = interim media protection goal

IT = Increasing trend in model extrapolation; no time-to-achieve estimated.

Key:

	= post-remediation EPC is higher than Upper Bound IMPG
	= post-remediation EPC is between Lower and Upper Bound IMPGs
	= post-remediation EPC is below Lower Bound IMPG
<value>/<value>	= Time to achieve the lower bound and upper bound IMPG, respectively (years)
<value>	= time to achieve predicted by the model
<value>	= time to achieve based on highly uncertain extrapolation of the model results as described in Section 3.2.1 of the CMS Report





**Table GC13-8. IMPGs for fish protection, and consumption of fish by ecological receptors compared to projected biota tissue PCBs for all SED alternatives, including the time to achieve in years (in italics).**

Ecological Receptor	Reach	Projected Fish Concentrations (mg/kg) <sup>2</sup>							IMPG Attainment								
		SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	IMPG (mg/kg)	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	
Fish protection	Warmwater fish tissue (whole body)																
	5A	28	0.98	0.99	1.0	0.99	1.1	0.68	55	5	3	3	3	3	3	3	
	5B	36	12	1.5	0.89	0.86	0.96	0.58		8	5	5	5	5	5	5	
	5C	29	7.0	1.6	0.65	0.63	0.70	0.43		0	0	0	0	0	0	0	
	5D	36	24	1.6	1.4	1.4	1.5	1.1		36	11	11	14	15	18	24	
	6 (WP)	34	2.8	0.89	0.70	0.68	0.77	0.50		7	5	5	5	5	5	5	
	7A	25	4.8	1.9	1.6	1.5	1.6	1.3		0	0	0	0	0	0	0	
	7B	22	8.2	6.3	6.1	1.6	0.90	0.40		0	0	0	0	0	0	0	
	7C	24	6.7	4.2	4.0	0.80	0.78	0.47		0	0	0	0	0	0	0	
	7D	21	5.2	3.2	3.0	2.7	2.9	2.5		0	0	0	0	0	0	0	
	7E	16	3.9	2.3	2.2	1.3	1.3	0.71		0	0	0	0	0	0	0	
	7F	13	3.1	2.0	1.9	1.7	1.8	1.5		0	0	0	0	0	0	0	
	7G	14	4.8	4.0	3.9	1.5	1.4	0.60		0	0	0	0	0	0	0	
	7H	11	2.8	1.8	1.6	1.5	1.5	1.3		0	0	0	0	0	0	0	
	8 (RP)	14	6.0	5.0	1.3	0.84	0.78	0.67		0	0	0	0	0	0	0	
	Coldwater fish tissue (whole body) - Trout Below PSA																
	7A	25	4.8	1.9	1.6	1.5	1.6	1.3	14	107	10	11	11	19	13	15	
	7B	22	8.2	6.3	6.1	1.6	0.90	0.40		103	11	11	18	19	23	31	
	7C	24	6.7	4.2	4.0	0.80	0.78	0.47		109	11	11	18	19	23	31	
	7D	21	5.2	3.2	3.0	2.7	2.9	2.5		100	10	10	10	18	12	15	
7E	16	3.9	2.3	2.2	1.3	1.3	0.71	63		10	9	9	11	10	14		
7F	13	3.1	2.0	1.9	1.7	1.8	1.5	35		9	8	8	10	9	13		
7G	14	4.8	4.0	3.9	1.5	1.4	0.60	41		10	8	8	11	9	14		
7H	11	2.8	1.8	1.6	1.5	1.5	1.34	27		9	7	7	9	8	11		
Fish tissue (whole body)																	
5A	25	0.45	0.45	0.46	0.45	0.51	0.31	30.41		31	3	3	3	4	4	5	
5B	23	13	1.1	0.40	0.38	0.42	0.28		9	5	5	5	5	6	6		
5C	24	7.7	1.6	0.37	0.38	0.40	0.26		24	7	7	7	7	8	8		
5D	19	15	0.76	0.67	0.62	0.67	0.49		25	10	11	14	14	17	21		
6 (WP)	18	1.6	0.42	0.34	0.32	0.36	0.24		7	5	5	5	5	5	5		
7A	9.2	2.3	1.3	1.2	1.1	1.2	1.1		0	0	0	0	0	0	0		
7B	16	9.5	8.9	8.8	1.9	0.8	0.24		0	0	0	0	0	0	0		
7C	11	4.7	3.8	3.7	0.30	0.3	0.20		0	0	0	0	0	0	0		
7D	10	3.6	3.0	2.9	2.7	2.9	2.5		0	0	0	0	0	0	0		
7E	6.5	2.2	1.7	1.7	0.81	0.72	0.27		0	0	0	0	0	0	0		
7F	5.5	1.9	1.5	1.4	1.4	1.4	1.2		0	0	0	0	0	0	0		
7G	7.0	3.8	3.6	3.6	1.1	0.98	0.24		0	0	0	0	0	0	0		
7H	4.4	1.5	1.2	1.1	1.1	1.1	1.0		0	0	0	0	0	0	0		
8 (RP)	7.7	4.9	4.4	0.79	0.41	0.32	0.32		0	0	0	0	0	0	0		
Fish tissue (whole body)																	
5A	21	0.55	0.55	0.56	0.55	0.63	0.38	3.2	211	10	10	10	10	11	12		
5B	22	11	1.0	0.44	0.42	0.47	0.30		> 250	202	12	12	12	14	17		
5C	23	7.0	1.5	0.41	0.41	0.44	0.28		> 250	114	14	17	17	20	28		
5D	21	15	0.89	0.79	0.77	0.84	0.62		244	96	15	18	18	21	28		
6 (WP)	22	1.9	0.56	0.45	0.43	0.49	0.32		> 250	13	17	19	20	24	39		
7A	11	2.4	1.2	1.1	1.1	1.1	0.97		173	18	17	20	20	23	34		
7B	16	8.4	7.6	7.5	1.7	0.74	0.26		> 250	> 250	> 250	> 250	20	24	40		
7C	12	4.4	3.3	3.2	0.40	0.37	0.23		203	130	75	41	20	25	41		
7D	11	3.4	2.6	2.5	2.3	2.5	2.2		244	64	19	22	21	29	42		
7E	7.4	2.2	1.6	1.5	0.79	0.73	0.32		133	22	17	19	19	24	36		
7F	6.1	1.9	1.4	1.3	1.2	1.3	1.1		119	17	16	18	20	24	31		
7G	7.3	3.5	3.2	3.1	1.1	0.92	0.28		171	68	21	22	20	25	42		
7H	5.0	1.5	1.1	1.1	1.0	1.0	0.95		94	12	11	11	19	12	29		
8 (RP)	7.8	4.4	3.9	0.78	0.43	0.36	0.34		156	115	105	19	21	26	49		

**Notes**

<sup>1</sup> Model endpoint concentrations after projection (autumn average)  
<sup>2</sup> Results presented in this table for SED 6, SED 7, and SED 8 reflect new downstream model simulations which have been revised from those presented in the CMS Report to assume remediation of more grid cells in Reaches 7B and 7C, as discussed in Response to Specific Comment 44.  
 IMPG = interim media protection goal  
 IT = Increasing trend in model extrapolation; no time-to-achieve estimated.

**Key**

 = model prediction exceeds the IMPG  
 = model prediction is lower than the IMPG  
 <value> = Time to achieve the IMPG (years), as predicted by the model  
 <value> = Time to achieve the IMPG (years), based on highly uncertain extrapolation of the model results as described in Section 3.2.1 of the CMS Report

**Table GC13-9. Summary of percent of averaging areas attaining IMPGs.**

Risk Assessment	Exposure	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Percent of Averaging Areas Attaining IMPGs <sup>1</sup>								
						SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8		
Human Health	Sediment Direct Contact	Older Child	RME	Cancer @ 10 <sup>-6</sup>	4.5	50%	75%	88%	88%	100%	100%	100%		
				Cancer @ 10 <sup>-5</sup>	45	100%	100%	100%	100%	100%	100%			
				Cancer @ 10 <sup>-4</sup>	453	100%	100%	100%	100%	100%	100%			
				Non-Cancer	31	100%	100%	100%	100%	100%	100%			
			CTE	Cancer @ 10 <sup>-6</sup>	36	100%	100%	100%	100%	100%	100%			
				Cancer @ 10 <sup>-5</sup>	365	100%	100%	100%	100%	100%	100%			
				Cancer @ 10 <sup>-4</sup>	3,645	100%	100%	100%	100%	100%	100%			
		Adult	RME	Non-Cancer	125	100%	100%	100%	100%	100%	100%			
				Cancer @ 10 <sup>-6</sup>	1.3	13%	13%	50%	63%	88%	88%	100%		
				Cancer @ 10 <sup>-5</sup>	13	75%	100%	100%	100%	100%	100%	100%		
				Cancer @ 10 <sup>-4</sup>	135	100%	100%	100%	100%	100%	100%	100%		
			CTE	Non-Cancer	40	100%	100%	100%	100%	100%	100%			
				Cancer @ 10 <sup>-6</sup>	28	100%	100%	100%	100%	100%	100%			
				Cancer @ 10 <sup>-5</sup>	280	100%	100%	100%	100%	100%	100%			
	Reach 5/6	Fish Consumption (Bass Fillets)	Deterministic	RME	Cancer @ 10 <sup>-4</sup>	2,800	100%	100%	100%	100%	100%	100%	100%	
					Non-Cancer	152	100%	100%	100%	100%	100%	100%		
					Cancer @ 10 <sup>-6</sup>	0.0019	0%	0%	0%	0%	0%	0%		
					Cancer @ 10 <sup>-5</sup>	0.019	0%	0%	0%	0%	0%	0%		
				Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-4</sup>	0.19	0%	0%	0%	40%	40%	40%	80%
						Non-Cancer -- Child	0.026	0%	0%	0%	0%	0%	0%	0%
						Non-Cancer -- Adult	0.062	0%	0%	0%	0%	0%	0%	0%
	Cancer @ 10 <sup>-6</sup>		0.049			0%	0%	0%	0%	0%	0%	0%		
	CTE (50th percentile)		Cancer @ 10 <sup>-5</sup>		0.49	0%	20%	100%	100%	100%	100%	100%		
			Cancer @ 10 <sup>-4</sup>		4.9	0%	80%	100%	100%	100%	100%	100%		
			Non-Cancer -- Child		0.19	0%	0%	0%	40%	40%	40%	80%		
	Reach 5/6		Fish Consumption (Bass Fillets)	Probabilistic	RME (5th percentile)	Non-Cancer -- Adult	0.43	0%	20%	100%	100%	100%	100%	100%
						Cancer @ 10 <sup>-6</sup>	0.0064	0%	0%	0%	0%	0%	0%	
						Cancer @ 10 <sup>-5</sup>	0.064	0%	0%	0%	0%	0%	0%	
Cancer @ 10 <sup>-4</sup>		0.64				0%	20%	100%	100%	100%	100%			
CTE (50th percentile)		Non-Cancer -- Child			0.059	0%	0%	0%	0%	0%	0%	0%		
		Non-Cancer -- Adult			0.12	0%	0%	0%	0%	0%	0%	20%		
		Cancer @ 10 <sup>-6</sup>			0.057	0%	0%	0%	0%	0%	0%	0%		
CTE (50th percentile)	Cancer @ 10 <sup>-5</sup>	0.57		0%	20%	100%	100%	100%	100%	100%				
	Cancer @ 10 <sup>-4</sup>	5.7		0%	80%	100%	100%	100%	100%	100%				
	Non-Cancer -- Child	0.71		0%	40%	100%	100%	100%	100%	100%				
CTE (50th percentile)	Non-Cancer -- Adult	1.5		0%	40%	100%	100%	100%	100%	100%				

**Table GC13-9. Summary of percent of averaging areas attaining IMPGs.**

Risk Assessment	Exposure	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Percent of Averaging Areas Attaining IMPGs <sup>1</sup>						
						SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8
Human Health	Fish Consumption (Bass Fillets)  Reach 7/8	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019	0%	0%	0%	0%	0%	0%	0%
				Cancer @ 10 <sup>-5</sup>	0.019	0%	0%	0%	0%	0%	0%	
				Cancer @ 10 <sup>-4</sup>	0.19	0%	0%	0%	0%	0%	56%	
				Non-Cancer -- Child	0.026	0%	0%	0%	0%	0%	0%	
			Non-Cancer -- Adult	0.062	0%	0%	0%	0%	0%	0%		
			CTE	Cancer @ 10 <sup>-6</sup>	0.049	0%	0%	0%	0%	0%	0%	
				Cancer @ 10 <sup>-5</sup>	0.49	0%	0%	11%	44%	89%	89%	
				Cancer @ 10 <sup>-4</sup>	4.9	56%	100%	100%	100%	100%	100%	
		Non-Cancer -- Child		0.19	0%	0%	0%	0%	0%	56%		
		Non-Cancer -- Adult	0.43	0%	0%	0%	33%	78%	78%	89%		
		Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064	0%	0%	0%	0%	0%	0%	
				Cancer @ 10 <sup>-5</sup>	0.064	0%	0%	0%	0%	0%	0%	
				Cancer @ 10 <sup>-4</sup>	0.64	0%	0%	44%	56%	89%	100%	
				Non-Cancer -- Child	0.059	0%	0%	0%	0%	0%	0%	
			Non-Cancer -- Adult	0.12	0%	0%	0%	0%	0%	22%		
			CTE (50th percentile)	Cancer @ 10 <sup>-6</sup>	0.057	0%	0%	0%	0%	0%	0%	
	Cancer @ 10 <sup>-5</sup>			0.57	0%	0%	33%	56%	89%	89%		
	Cancer @ 10 <sup>-4</sup>			5.7	78%	100%	100%	100%	100%	100%		
	Non-Cancer -- Child	0.71		0%	0%	44%	56%	100%	89%			
	Non-Cancer -- Adult	1.5	0%	67%	89%	89%	100%	100%	100%			
	Fish Consumption (Bass Fillets)  CT <sup>2</sup>	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019	0%	0%	0%	0%	0%	0%	
				Cancer @ 10 <sup>-5</sup>	0.019	0%	0%	75%	100%	100%	100%	
				Cancer @ 10 <sup>-4</sup>	0.19	75%	100%	100%	100%	100%	100%	
				Non-Cancer -- Child	0.026	0%	50%	100%	100%	100%	100%	
			Non-Cancer -- Adult	0.062	0%	100%	100%	100%	100%	100%		
			CTE	Cancer @ 10 <sup>-6</sup>	0.049	0%	100%	100%	100%	100%	100%	
				Cancer @ 10 <sup>-5</sup>	0.49	100%	100%	100%	100%	100%	100%	
				Cancer @ 10 <sup>-4</sup>	4.9	100%	100%	100%	100%	100%	100%	
		Non-Cancer -- Child		0.19	75%	100%	100%	100%	100%	100%		
		Non-Cancer -- Adult	0.43	100%	100%	100%	100%	100%	100%			
		Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064	0%	0%	0%	50%	75%	75%	
				Cancer @ 10 <sup>-5</sup>	0.064	0%	100%	100%	100%	100%	100%	
Cancer @ 10 <sup>-4</sup>				0.64	100%	100%	100%	100%	100%	100%		
Non-Cancer -- Child				0.059	0%	100%	100%	100%	100%	100%		
Non-Cancer -- Adult			0.12	75%	100%	100%	100%	100%	100%			
CTE (50th percentile)			Cancer @ 10 <sup>-6</sup>	0.057	0%	100%	100%	100%	100%	100%		
	Cancer @ 10 <sup>-5</sup>		0.57	100%	100%	100%	100%	100%	100%			
	Cancer @ 10 <sup>-4</sup>		5.7	100%	100%	100%	100%	100%	100%			
	Non-Cancer -- Child	0.71	100%	100%	100%	100%	100%	100%				
Non-Cancer -- Adult	1.5	100%	100%	100%	100%	100%	100%					

**Table GC13-9. Summary of percent of averaging areas attaining IMPGs.**

Risk Assessment	Ecological Receptor	Medium Subject to IMPG	IMPG Type	IMPG (mg/kg)	Percent of Averaging Areas Attaining IMPGs <sup>1</sup>						
					SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8
Ecological Receptors	Benthic Invertebrates	Sediment	Lower Bound	3	22%	63%	91%	91%	100%	100%	100%
			Upper Bound	10	72%	100%	100%	100%	100%	100%	100%
	Amphibians (represented by wood frog)	Backwater sediment	Lower Bound	3.27	24%	31%	72%	72%	100%	100%	100%
			Upper Bound	5.6	34%	52%	93%	93%	100%	100%	100%
	Warmwater fish	Warmwater fish tissue (whole body)	Single value	55	100%	100%	100%	100%	100%	100%	100%
	Coldwater fish – trout below PSA	Coldwater fish tissue (whole body)	Single value	14	38%	100%	100%	100%	100%	100%	100%
	Piscivorous birds (represented by osprey)	Fish tissue (whole body)	Single value	3.2	0%	43%	79%	93%	100%	100%	100%
Threatened and endangered species (represented by bald eagle)	Fish tissue (whole body)	Single value	30.41	100%	100%	100%	100%	100%	100%	100%	

Notes:

<sup>1</sup> Results presented in this table for SED 6, SED 7, and SED 8 reflect new downstream model simulations which have been revised from those presented in the CMS Report to assume remediation of more grid cells in Reaches 7B and 7C, as discussed in Response to Specific Comment 44.

<sup>2</sup> Results for CT impoundments are highly uncertain as they were estimated from the CT 1-D Analysis.

**Table GC13-10. Adverse impacts of remediation on workers and local communities from SED alternatives<sup>1</sup>.**

Category		SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8
Truck Trips and Vehicle Miles Traveled for Importation of Cap/Backfill/Stabilization Material	Total Number of Truck Trips <sup>2</sup>	---	22,700	46,300	61,900	70,900	92,000	223,400
	Number of Truck Trips (per year) <sup>2</sup>	---	2,400	3,200	3,400	3,500	3,700	4,400
	Number of Vehicle Miles Traveled <sup>3</sup>	---	1,135,000	2,315,000	3,095,000	3,545,000	4,600,000	11,170,000
Worker Non-fatal Injuries	Total Estimated Non-fatal Injuries <sup>4</sup>	---	3.68	6.30	7.51	7.48	9.57	16.23
	Estimated Non-fatal Injuries (per year) <sup>4</sup>	---	0.38	0.43	0.41	0.37	0.38	0.32
	Probability of at Least One Non-fatal Injury <sup>5</sup>	---	97%	100%	100%	100%	100%	100%
Worker Fatalities	Total Estimated Fatalities <sup>6</sup>	---	0.03	0.05	0.07	0.08	0.12	0.26
	Estimated Fatalities (per year) <sup>6</sup>	---	0.003	0.003	0.004	0.004	0.005	0.005
	Probability of at Least One Fatality <sup>5</sup>	---	3%	5%	7%	8%	11%	23%
Fatalities and Non-fatal Injuries Related to Truck Transportation of Imported Materials	Fatality Estimate <sup>7</sup>	---	0.03	0.06	0.07	0.09	0.11	0.27
	Fatality Estimate (per year) <sup>7</sup>	---	0.003	0.004	0.004	0.004	0.004	0.005
	Probability of at Least One Fatality	---	3%	5%	7%	8%	10%	24%
	Injury Estimate <sup>8</sup>	---	0.65	1.32	1.76	2.02	2.62	6.37
	Injury Estimate (per year) <sup>8</sup>	---	0.07	0.09	0.10	0.10	0.10	0.13
	Probability of at Least One Injury	---	48%	73%	83%	87%	93%	100%

Notes:

<sup>1</sup> As discussed in Response to Specific Comment 83, the numbers presented in this table are based on the estimates presented in the CMS Report; they have not been revised to take account of revised information on total removal volumes or implementation durations for the sediment alternatives. These estimates are presented for general illustrative and comparative purposes.

<sup>2</sup> Assumes 16-ton trucks with a capacity of 12 cy for importation of cap, backfill, and bank stabilization materials.

<sup>3</sup> Assumes a 50 mile round trip.

<sup>4</sup> Sum of the estimated number of non-fatal injuries in each labor category.

<sup>5</sup> Assuming a Poisson probability distribution.

<sup>6</sup> Sum of the estimated number of fatal injuries in each labor category.

<sup>7</sup> Assumes a fatality rate of  $2.4 \times 10^{-8}$  fatalities per vehicle mile traveled.

<sup>8</sup> Assumes a non-fatal injury rate of  $5.7 \times 10^{-7}$  injuries per vehicle mile traveled.

**Table GC13-11. Summary of removal volumes, areas, and costs for all FP alternatives.**

Category		FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7	
Remediation Summary <sup>1</sup>	Total Removal Volume (cy)	0	22,000	74,000	121,000	104,000	320,000	631,000	
	Total Removal Area (acres)	0	13	44	72	63	197	387	
	Years to Implement <sup>2</sup>	0	0.8	3	5	4	13	24	
	Cost (M) <sup>3</sup>	Total Capital Cost	0	\$10.3 M	\$28.9 M	\$44.5 M	\$36.9 M	\$106 M	\$189 M
		OMM Cost	0	\$0.43 M	\$0.80 M	\$1.2 M	\$1.1 M	\$3.3 M	\$6.1 M
	Total Cost of Alternative	0	\$10.7 M	\$29.7 M	\$45.7 M	\$38.1 M	\$109 M	\$195 M	

*Notes:*

<sup>1</sup> Removal volumes and areas have been updated from those presented in the CMS Report due to changes made in response to EPA's Specific Comments 95, 98, 112, 113, and 115.

<sup>2</sup> The implementation durations listed in this table assume that the floodplain remedial alternatives would be implemented independently from the sediment alternatives. In fact, implementation of the selected floodplain alternative would likely be implemented in coordination with the selected sediment alternative, in which case the implementation times could be different from those listed in this table.

<sup>3</sup> Cost estimates presented in this table have been updated from those presented in CMS Report based on EPA's comments on the prior cost estimates.

**Table GC13-12a. Summary of adverse impacts on habitat for all FP alternatives.**

Category			FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7
Number of State-listed Rare Species that would be "Taken"			0	13	19	19	19	21	21
Number of State-listed Rare Species where Alternative Would Impact Significant Portion of Local Population			0	0	3	4	3	18	18
Total Acres of Impacted NHESP Priority Habitat of Rare Species <sup>1</sup>			0	23	68	106	89	229	384
Total Acres of Impacted NHESP Estimated Habitat of Rare Wildlife <sup>1</sup>			0	22	66	104	88	228	379
Summary of Affected Floodplain Habitat Area (acres) from Floodplain Remediation <sup>2</sup>	Upland	Open Field	0	3	3	4	< 1	6	16
		Upland Forest	0	0	< 1	1	< 1	3	4
		<b>Total</b>	<b>0</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>1</b>	<b>9</b>	<b>20</b>
	Wetland	Wetland Forest	0	6	14	40	31	96	172
		Emergent Wetland	0	1	7	9	17	51	53
		Shrub swamp	0	< 1	1	< 1	7	27	16
		Vernal Pools	0	0	15	15	3	10	17
		Backwater	0	0	0	0	0	0	15
	<b>Total</b>	<b>0</b>	<b>8</b>	<b>37</b>	<b>64</b>	<b>59</b>	<b>184</b>	<b>273</b>	
Summary of Affected Floodplain Habitat Area (acres) from Construction of Staging Areas and Access Roads <sup>2</sup>	Upland	Open Field	0	< 1	2	4	1	4	2
		Upland Forest	0	< 1	1	2	2	2	2
		<b>Total</b>	<b>0</b>	<b>&lt; 1</b>	<b>4</b>	<b>6</b>	<b>3</b>	<b>6</b>	<b>4</b>
	Wetland	Wetland Forest	0	5	7	9	10	9	8
		Emergent Wetland	0	< 1	3	4	2	3	2
		Shrub swamp	0	< 1	4	5	4	4	4
		Vernal Pools	0	< 1	< 1	< 1	< 1	< 1	< 1
		<b>Total</b>	<b>0</b>	<b>7</b>	<b>14</b>	<b>18</b>	<b>16</b>	<b>16</b>	<b>14</b>

Notes:

<sup>1</sup> Acres of impacted NHESP habitat includes impacts resulting from both remediation and construction of staging areas and access roads. Area calculations assume a road width of 20 ft.

<sup>2</sup> This detailed breakdown of removal areas and volumes by habitat type was conducted using the ecological characterization of the Housatonic River between the Confluence and Woods Pond Dam performed by Woodlot Alternatives, Inc. on behalf of EPA (Woodlot, 2002). The Woodlot habitat community mapping is absent in some small portions of the PSA floodplain and in all of Reaches 7 and 8, and is therefore not included in this summary.

**Table GC13-12b. Summary of adverse impacts on State-listed rare species for all FP alternatives.**

Category		FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7
Area (acres) of State-listed Rare Species Habitat Impacted by Floodplain Remediation and Construction of Staging Areas and Access Roads	Wood turtle	0	22	61	96	77	199	275
	Jefferson salamander	0	2	4	5	8	9	9
	American bittern	0	17	48	71	70	165	225
	Bald eagle	0	0	5	5	9	25	39
	Common moorhen	0	<1	9	13	18	54	71
	Water shrew	0	0	3	3	4	11	8
	American clam shrimp	0	0	0	0	0	0	0
	Arrow clubtail	0	17	51	86	71	189	273
	Brook snaketail	0	1	7	11	11	21	29
	Mustard white	0	16	43	67	43	135	198
	Riffle snaketail	0	7	14	23	14	39	58
	Triangle floater	0	8	17	28	18	47	70
	Zebra clubtail	0	17	51	86	71	189	272
	Bristly buttercup	0	4	8	14	9	26	36
	Bur oak	0	4	14	22	32	65	80
	Crooked-stem aster	0	<1	3	3	2	6	6
	Culver's root	0	0	0	0	0	0	<1
	Fen cuckoo flower	0	0	0	0	0	0	0
	Foxtail sedge	0	3	9	13	11	31	40
	Gray's sedge	0	0	1	2	5	16	20
	Hairy wild rye	0	<1	3	4	<1	6	13
	Hemlock parsley	0	0	0	0	0	0	0
	Intermediate spike-rush	0	13	39	58	46	110	161
	Long-styled sanicle	0	0	0	0	0	0	0
	Narrow-leaved spring beauty	0	<1	3	7	2	14	18
	Straight-leaved pondweed	0	0	0	0	<1	<1	<1
Wapato	0	19	56	89	75	199	276	
White adder's-mouth	0	<1	<1	<1	0	0	<1	







**Table GC13-13a. Summary of pre- and post-remediation EPCs and RME IMPGs for human direct contact exposure areas under all FP scenarios.** <sup>1</sup>

Exposure Area ID <sup>2</sup>	Area of Exposure Area (acre) <sup>3</sup>	IMPG Scenario	Pre-Remediation EPC (mg/kg) <sup>4</sup>	Post-Remediation EPC (mg/kg)							Cancer Risk @ 10 <sup>-6</sup> (RME)							Cancer Risk @ 10 <sup>-5</sup> (RME)							Cancer Risk @ 10 <sup>-4</sup> (RME)							Non-cancer (RME)										
				FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7	IMPG (mg/kg) <sup>5,6</sup>	FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7	IMPG (mg/kg) <sup>5</sup>	FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7	IMPG (mg/kg) <sup>5</sup>	FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7								
				FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7	IMPG (mg/kg) <sup>5,6</sup>	FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7	IMPG (mg/kg) <sup>5</sup>	FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7	IMPG (mg/kg) <sup>5</sup>	FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7								
74	5.3	High-use general recreation, adult	5.4	5.4	5.4	5.4	5.4	5.4	5.4	2.0	2.0							14																								
75	3.4	High-use general recreation, adult	15	15	15	14	14	15	15	2.0	2.0							14																								
76	1.1	High-use general recreation, adult	0.79	0.79	0.79	0.79	0.79	0.79	0.79	0.79	2.0							14																								
77	4.2	High-use general recreation, adult	1.2	1.2	1.2	1.2	1.2	1.2	1.2	1.2	2.0							14																								
78	6.2	High-use general recreation, older child	3.9	3.9	3.9	3.9	3.9	3.9	3.9	3.8	3.9							39																								
79	17	High-use general recreation, adult	3.1	3.1	3.1	3.1	3.1	3.1	3.1	2.0	2.0							14																								
80a	9.5	Low-use general recreation, adult	7.7	7.7	7.7	7.7	7.7	7.7	7.7	3.9	4.3							43																								
80b	20	Agricultural use (based on direct contact by farmer)	0.77	0.77	0.77	0.77	0.77	0.77	0.77	0.12	2.0							12																								
81	33	Low-use general recreation, adult	2.3	2.3	2.3	2.3	2.3	2.3	2.3	2.3	4.3							43																								
82	15	Low-use general recreation, adult	7.7	7.7	7.7	7.7	7.7	7.7	7.7	4.3	4.3							43																								
83	22	High-use commercial (groundskeeper scenario)	6.5	6.5	6.5	6.5	6.5	6.5	6.5	2.0	2.0							18																								
84	8.5	Low-use general recreation, adult	4.7	4.7	4.7	4.7	4.7	4.7	4.7	4.3	4.3							43																								
85a	0.25	Recreational canoeist	8.5	8.5	8.5	8.5	8.5	8.5	8.5	2.0	2.0							12																								
85b	10	High-use general recreation, older child	1.9	1.9	1.9	1.9	1.9	1.9	1.9	1.9	3.9							39																								
86	118	High-use commercial (groundskeeper scenario)	2.5	2.5	2.5	2.5	2.5	2.5	2.5	2.0	2.0							18																								
87	10	High-use general recreation, adult / young child (high use)	15	15	4.6	4.6	4.6	15	15	2.0	2.0							13																								
87a	0.88	Bank fishing	9.1	9.1	6.6	6.6	6.6	9.1	9.1	2.6	2.6							26																								
88	1.1	Medium-use general recreation, older child	13	13	13	13	13	13	13	5.8	5.8							58																								
89	4.3	High-use general recreation, adult	6.3	6.3	6.3	6.3	6.3	6.3	6.3	2.0	2.0							14																								
90	8.9	High-use general recreation, adult / older child	6.1	6.1	6.1	6.1	6.1	6.1	6.1	2.0	2.0							14																								
<b>Heavily Used Subareas</b>																																										
4	0.71	High-use general recreation, adult / older child / young child (low use)	67	67	67	9.3	9.3	10	5.7	0.64	2.0							14																								
12	1.5	High-use general recreation, adult / older child / young child (low use)	11	11	11	11	11	11	5.4	1.3	2.0							14																								
26a	2.2	High-use general recreation, adult / older child	1.9	1.9	1.9	1.9	1.9	1.9	1.9	0.27	2.0							14																								
37b	0.31	High-use general recreation, adult / older child	0.44	0.44	0.44	0.44	0.44	0.44	0.44	0.44	2.0							14																								
39	0.15	Marathon canoeist	52	52	52	4.9	4.9	12	10	2.0	2.0							7.8																								
40	5.2	High-use general recreation, adult / young child (low use)	90	90	90	3.5	3.5	56	18	1.4	2.0							14																								
47	0.18	Recreational canoeist	6.4	6.4	6.4	0.62	0.62	6.4	6.4	0.62	2.0							12																								
52	0.25	Recreational canoeist	6.6	6.6	6.6	4.4	4.4	6.6	6.6	2.0	2.0							12																								
53	0.35	Recreational canoeist	408	408	408	5.3	5.3	300	6.8	0.80	2.0							12																								
58	0.16	High-use general recreation, adult	22	22	22	0.59	0.59	0.59	0.59	0.59	2.0							14																								
59	0.15	High-use general recreation, adult / young child (low use)	28	28	28	1.8	1.8	28	12	0.70	2.0							14																								
60a	0.16	Recreational canoeist	7.4	7.4	7.4	7.2	7.2	7.4	7.4	0.84	2.0							12																								

Key:  
 = post-remediation EPC is higher than IMPG  
 = post-remediation EPC is lower than IMPG

Notes:  
<sup>1</sup> The information presented in this table reflects revisions to the information presented in the CMS Report due to changes made in response to EPA's Specific Comments 95, 98, 112, 113, and 115.  
<sup>2</sup> See CMS Report Figures 5-1 and 5-2 for direct contact exposure areas in Reaches 5 through 8, and Heavily Used Subareas, respectively.  
<sup>3</sup> Area only includes the portion of the exposure area within the 1 mg/kg PCB isopleth (Reaches 5/6) or the 100-year floodplain (Reaches 7/8).  
<sup>4</sup> EPC is calculated for top 1-ft floodplain soil, except in Heavily Used Subareas where it is calculated for top 3-ft floodplain soil.  
<sup>5</sup> For scenarios that contain more than one receptor (e.g., adult plus older child and/or young child), the lowest IMPG was utilized in the comparison to the post-remediation EPC.  
<sup>6</sup> IMPGs less than 2 mg/kg were set to 2 mg/kg, because that concentration is fully protective for direct contact with soil under an unrestricted use scenario.









**Table GC13-15. Summary of amphibian IMPGs and pre- and post-remediation EPCs for amphibian averaging areas (vernal pools) under all FP alternatives.<sup>1</sup>**

Vernal Pool ID <sup>2</sup>	Area of Vernal Pool (acre)	Pre-Remediation EPC (mg/kg) <sup>3</sup>	Post-Remediation EPC (mg/kg) <sup>3</sup>							IMPG Attainment								
			FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7	Lower Bound IMPG (mg/kg)	Upper Bound IMPG (mg/kg)	FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7
5-VP-3	1.9	73	73	73	5.6	5.6	25	7.7	3.1	3.27	5.6							
5-VP-1	0.044	1.7	1.7	1.7	1.7	1.7	1.7	1.7	1.7	3.27	5.6							
8-VP-5	0.043	23	23	23	5.6	5.6	23	20	0.45	3.27	5.6							
8-VP-4	0.24	3.9	3.9	3.9	3.9	3.9	3.9	3.9	3.27	3.27	5.6							
8-VP-3	0.024	7.7	7.7	7.7	0.021	0.021	7.7	7.7	0.021	3.27	5.6							
8-VP-2	0.57	69	69	69	5.6	5.6	34	4.2	3.1	3.27	5.6							
18-VP-2	0.61	7.2	7.2	7.2	5.6	5.6	7.2	7.2	3.27	3.27	5.6							
18-VP-1	0.28	8.1	8.1	8.1	5.6	5.6	8.1	8.1	3.27	3.27	5.6							
19-VP-7	0.068	0.84	0.84	0.84	0.84	0.84	0.84	0.84	0.84	3.27	5.6							
19-VP-2	0.0080	34	34	34	0.021	0.021	34	0.021	0.021	3.27	5.6							
19-VP-1	0.18	32	32	32	5.6	5.6	32	24	3.27	3.27	5.6							
19-VP-3	0.031	10	10	10	5.6	5.6	10	10	3.27	3.27	5.6							
19-VP-4	0.094	6.0	6.0	6.0	5.6	5.6	6.0	6.0	0.021	3.27	5.6							
19-VP-8	0.057	91	91	91	0.021	0.021	0.021	0.021	0.021	3.27	5.6							
19-VP-5	0.51	45	45	45	5.6	5.6	45	11	3.27	3.27	5.6							
19-VP-6	1.2	24	24	24	5.6	5.6	24	7.8	3.27	3.27	5.6							
23-VP-2	0.18	47	47	47	5.6	3.7	37	19	3.27	3.27	5.6							
23-VP-1	0.30	75	75	75	5.6	5.3	26	7.1	0.021	3.27	5.6							
23A-VP-1	0.45	10	10	10	5.6	5.6	10	10	3.27	3.27	5.6							
23B-VP-1	0.068	7.2	7.2	7.2	5.6	5.6	7.2	7.2	3.27	3.27	5.6							
23B-VP-2	0.091	0.34	0.34	0.34	0.34	0.34	0.34	0.34	0.34	3.27	5.6							
27B-VP-2	0.28	11	11	11	5.6	5.6	11	11	3.27	3.27	5.6							
27B-VP-3	0.062	16	16	16	0.021	0.021	16	16	0.021	3.27	5.6							
27B-VP-1	0.072	12	12	12	5.6	5.6	12	12	3.27	3.27	5.6							
27-VP-2	0.47	21	21	21	5.6	5.6	21	21	3.27	3.27	5.6							
27A-VP-1	0.20	31	31	31	5.6	5.6	31	11	3.27	3.27	5.6							
27-VP-1	1.3	23	23	23	5.6	5.6	23	23	3.27	3.27	5.6							
26-VP-1	0.036	40	40	40	5.6	5.6	40	15	3.27	3.27	5.6							
33-VP-1	0.022	9.5	9.5	9.5	0.021	0.021	9.5	9.5	0.021	3.27	5.6							
33-VP-2	0.12	70	70	70	5.6	4.8	46	4.8	0.021	3.27	5.6							
38-VP-1	0.43	36	36	36	5.6	5.6	28	22	3.27	3.27	5.6							
38A-VP-1	0.020	5.0	5.0	5.0	5.6	5.0	5.0	5.0	0.021	3.27	5.6							
38-VP-3	0.046	28	28	28	5.6	5.6	28	5.0	0.021	3.27	5.6							
38-VP-2	0.17	46	46	46	5.6	5.1	29	9.4	3.1	3.27	5.6							
40-VP-3	0.46	67	67	67	5.6	5.6	34	12	2.7	3.27	5.6							
40-VP-2	0.36	18	18	18	5.6	5.6	18	18	3.27	3.27	5.6							
40A-VP-1	0.11	68	68	68	5.6	5.6	48	17	3.27	3.27	5.6							
40-VP-1	0.47	57	57	57	5.6	5.6	4.2	4.2	3.27	3.27	5.6							
42-VP-1	0.22	64	64	64	5.6	5.6	4.8	0.021	2.8	3.27	5.6							
42-VP-2	0.28	46	46	46	5.6	5.6	46	1.7	3.27	3.27	5.6							
42-VP-3	0.050	41	41	41	5.6	5.6	41	1.9	0.021	3.27	5.6							
42-VP-5	0.58	73	73	73	5.6	5.6	24	24	3.27	3.27	5.6							
42-VP-4	1.0	34	34	34	5.6	5.6	26	6.2	3.27	3.27	5.6							
42A-VP-1	1.5	35	35	35	5.6	5.6	21	11	3.27	3.27	5.6							
46-VP-2	7.1	140	140	140	5.6	5.6	3.0	3.0	3.0	3.27	5.6							
46-VP-1	0.52	1.3	1.3	1.3	1.3	1.3	1.3	1.3	1.3	3.27	5.6							
46-VP-5	0.056	125	125	120	0.021	0.021	4.5	0.021	0.021	3.27	5.6							
46-VP-3	1.4	153	153	150	3.2	3.2	35	3.2	3.27	3.27	5.6							
46-VP-4	0.011	125	125	125	0.021	0.021	0.021	0.021	0.021	3.27	5.6							
49A-VP-1	0.019	16	16	16	0.021	0.021	16	16	0.021	3.27	5.6							
49-VP-1	1.2	18	18	18	5.6	5.6	18	11	3.27	3.27	5.6							
49B-VP-1	0.0044	26	26	26	0.021	0.021	26	0.021	0.021	3.27	5.6							
66A-VP-1	0.032	0.73	0.73	0.73	0.73	0.73	0.73	0.73	0.73	3.27	5.6							
69-VP-1	0.0074	12	12	12	0.021	0.021	12	12	0.021	3.27	5.6							
8-VP-6	0.086	47	47	47	5.6	5.6	47	0.021	0.021	3.27	5.6							
12-VP-1	0.080	14	14	14	0.021	0.021	14	14	0.021	3.27	5.6							
39-VP-1	2.0	39	39	39	5.6	5.6	39	1.8	2.3	3.27	5.6							
54-VP-1	0.20	21	21	21	5.6	5.6	21	21	3.0	3.27	5.6							
55-VP-1	0.59	7.6	7.6	7.6	5.6	5.6	7.6	2.2	3.27	3.27	5.6							
55A-VP-1	2.0	40	40	40	5.6	5.6	34	6.5	3.2	3.27	5.6							



**Table GC13-15. Summary of amphibian IMPGs and pre- and post-remediation EPCs for amphibian averaging areas (vernal pools) under all FP alternatives.<sup>1</sup>**

Vernal Pool ID <sup>2</sup>	Area of Vernal Pool (acre)	Pre-Remediation EPC (mg/kg) <sup>3</sup>	Post-Remediation EPC (mg/kg) <sup>3</sup>							IMPG Attainment								
			FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7	Lower Bound IMPG (mg/kg)	Upper Bound IMPG (mg/kg)	FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7
58A-VP-1	0.32	25	25	25	5.6	5.6	25	25	3.27	3.27	5.6							
67A-VP-1	0.12	51	51	51	5.6	5.6	11	11	3.27	3.27	5.6							
61A-VP-1	0.19	18	18	18	5.3	5.3	18	18	3.2	3.27	5.6							
61A-VP-2	1.2	19	19	19	5.5	5.5	19	6.2	3.27	3.27	5.6							
56A-VP-1	0.58	73	73	73	5.6	5.6	22	9.7	3.27	3.27	5.6							
23-VP-3	1.3	22	22	22	5.6	5.6	22	22	3.0	3.27	5.6							

**Key:**

- = post-remediation EPC is higher than Upper Bound IMPG
- = post-remediation EPC is between Lower and Upper Bound IMPGs
- = post-remediation EPC is below Lower Bound IMPG

**Notes:**

<sup>1</sup> The EPCs presented in this table reflect revisions to those presented in the CMS Report due to changes made in response to EPA's Specific Comments 95, 98, 112, 113, and 115.

<sup>2</sup> See CMS Report Figure 5-5 for locations of vernal pools.

<sup>3</sup> EPC is calculated for the top 1 ft of floodplain soil.

Table GC13-16. Summary of IMPGs for omnivorous/carnivorous mammals and pre- and post-remediation EPCs for relevant averaging areas under all FP alternatives.<sup>1</sup>

Averaging Area ID <sup>2</sup>	Pre-Remediation EPC (mg/kg) <sup>3</sup>	Post-Remediation EPC (mg/kg) <sup>3</sup>							IMPG Attainment								
		FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7	Lower Bound IMPG (mg/kg)	Upper Bound IMPG (mg/kg)	FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7
G1	20	20	19	14	12	12	5.2	3.3	21.1	34.3							
G2	51	51	23	18	14	14	6.0	2.7	21.1	34.3							
G3	19	19	18	17	14	16	7.3	3.5	21.1	34.3							
G4	27	27	27	24	21	20	6.5	5.0	21.1	34.3							
G5	28	28	28	23	19	11	6.5	6.3	21.1	34.3							
G6	12	12	12	12	12	9.3	4.5	7.1	21.1	34.3							
G7	18	18	17	17	14	12	6.6	8.3	21.1	34.3							

Key:

	= post-remediation EPC is higher than Upper Bound IMPG
	= post-remediation EPC is between Lower and Upper Bound IMPGs
	= post-remediation EPC is below Lower Bound IMPG

Notes:

<sup>1</sup> The EPCs presented in this table reflect revisions to those presented in the CMS Report due to changes made in response to EPA's Specific Comments 95, 98, 112, 113, and 115.

<sup>2</sup> See CMS Report Figure 5-6 for averaging areas for omnivorous/carnivorous mammals (based on short-tailed shrews).

<sup>3</sup> EPC is calculated for the top 1 ft of floodplain soil.

**Table GC13-17. Exposure / averaging area acreage attaining IMPGs for all FP alternatives. <sup>1</sup>**

Category	Exposure Assumptions	Risk Range	FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7
Human Direct Contact	RME	Cancer Risk 10 <sup>-4</sup>	100%	100%	100%	100%	100%	100%	100%
		Cancer Risk 10 <sup>-5</sup>	61%	63%	72%	100%	76%	98%	100%
		Cancer Risk 10 <sup>-6</sup> (or 2 mg/kg)	6%	6%	7%	7%	6%	17%	100%
		Non-cancer	86%	100%	100%	100%	93%	94%	100%
	CTE	Cancer Risk 10 <sup>-4</sup>	100%	100%	100%	100%	100%	100%	100%
		Cancer Risk 10 <sup>-5</sup>	100%	100%	100%	100%	100%	100%	100%
		Cancer Risk 10 <sup>-6</sup>	94%	99%	99%	100%	99%	99%	100%
		Non-cancer	100%	100%	100%	100%	100%	100%	100%
Agricultural Products Consumption	RME	Cancer Risk 10 <sup>-4</sup>	100%	100%	100%	100%	100%	100%	100%
		Cancer Risk 10 <sup>-5</sup>	100%	100%	100%	100%	100%	100%	100%
		Cancer Risk 10 <sup>-6</sup>	12%	12%	12%	12%	12%	12%	100%
		Non-cancer (Child)	100%	100%	100%	100%	100%	100%	100%
	CTE	Non-cancer (Adult)	100%	100%	100%	100%	100%	100%	100%
		Cancer Risk 10 <sup>-4</sup>	100%	100%	100%	100%	100%	100%	100%
		Cancer Risk 10 <sup>-5</sup>	100%	100%	100%	100%	100%	100%	100%
		Cancer Risk 10 <sup>-6</sup>	98%	98%	98%	98%	98%	98%	100%
Ecological Receptors <sup>2</sup>		Non-cancer (Child)	100%	100%	100%	100%	100%	100%	100%
		Non-cancer (Adult)	100%	100%	100%	100%	100%	100%	100%
		Amphibians (upper bound)	3%	3%	100%	100%	26%	41%	100%
		Amphibians (lower bound)	2%	2%	7%	7%	23%	37%	100%
		Omnivorous/carnivorous mammals (upper bound)	85%	100%	100%	100%	100%	100%	100%
		Omnivorous/carnivorous mammals (lower bound)	56%	56%	71%	100%	100%	100%	100%

*Notes:*

<sup>1</sup> Values represent percentage of the total acreage evaluated that achieve the specified IMPG. The total acreage evaluated consists of the total EA acreage for human direct contact (1,330 acres), total farm acreage for agricultural products consumption (175 acres), total vernal pool acreage for amphibians (34 acres), and total shrew evaluation area for omnivorous/carnivorous mammals (600 acres). The percentages presented in this table reflect revisions to those presented in the CMS Report due to changes made in response to EPA's Specific Comments 95, 98, 112, 113, and 115.

<sup>2</sup> Insectivorous birds and piscivorous mammals are not included since they are addressed separately for all combined SED and FP alternatives in the Response to General Comment 24.

**Table GC13-18. Adverse impacts of remediation on workers and local communities for all FP alternatives<sup>1</sup>.**

Category		FP 1	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7
Truck Trips and Vehicle Miles Traveled for Importation of Backfill Material	Total Number of Truck Trips <sup>2</sup>	0	3,700	9,500	13,400	13,300	37,700	67,100
	Number of Truck Trips (per year) <sup>2</sup>	0	3,700	3,800	3,400	3,300	2,900	3,000
	Number of Vehicle Miles Traveled <sup>3</sup>	0	185,000	475,000	670,000	665,000	1,885,000	3,355,000
Worker Non-fatal Injuries	Total Estimated Non-fatal Injuries <sup>4</sup>	0	0.28	1.08	1.55	1.57	4.65	7.86
	Estimated Non-fatal Injuries (per year) <sup>4</sup>	0	0.28	0.43	0.39	0.39	0.36	0.36
	Probability of at Least One Non-fatal Injury <sup>5</sup>	0	25%	66%	79%	79%	99%	100%
Worker Fatalities	Total Estimated Fatalities <sup>6</sup>	0	0.002	0.008	0.01	0.01	0.03	0.06
	Estimated Fatalities (per year) <sup>6</sup>	0	0.002	0.003	0.003	0.003	0.002	0.003
	Probability of at Least One Fatality <sup>5</sup>	0	0.2%	0.8%	1.0%	1.0%	3.0%	6.0%
Fatalities and Non-fatal Injuries Related to Truck Transportation of Imported Materials	Fatality Estimate <sup>7</sup>	0	0.004	0.01	0.02	0.02	0.05	0.08
	Fatality Estimate (per year) <sup>7</sup>	0	0.004	0.004	0.005	0.005	0.004	0.004
	Probability of at Least One Fatality	0	0.4%	1.0%	2.0%	2.0%	4.0%	8.0%
	Injury Estimate <sup>8</sup>	0	0.11	0.27	0.38	0.38	1.07	1.91
	Injury Estimate (per year) <sup>8</sup>	0	0.11	0.11	0.10	0.10	0.08	0.09
	Probability of at Least One Injury	0	10%	24%	32%	32%	66%	85%

*Notes:*

<sup>1</sup> As discussed in Response to Specific Comment 83, the numbers presented in this table are based on the estimates presented in the CMS Report; they have not been revised to take account of revised information on total removal volumes or implementation durations for the sediment alternatives. These estimates are presented for general illustrative and comparative purposes.

<sup>2</sup> Assumes 16-ton trucks with a capacity of 12 cy for importation of backfill materials.

<sup>3</sup> Assumes a 50 mile round trip.

<sup>4</sup> Sum of the estimated number of non-fatal injuries in each labor category.

<sup>5</sup> Assuming a Poisson probability distribution.

<sup>6</sup> Sum of the estimated number of fatal injuries in each labor category.

<sup>7</sup> Assumes a fatality rate of  $2.4 \times 10^{-8}$  fatalities per vehicle mile traveled.

<sup>8</sup> Assumes a non-fatal injury rate of  $5.7 \times 10^{-7}$  injuries per vehicle mile traveled.

**Table GC24-1. Model-predicted sediment endpoint PCB concentrations used to calculate associated target floodplain soil levels for insectivorous birds (wood duck).**

Reach	Averaging Area	Model-Predicted Sediment Endpoint PCB Concentrations (mg/kg)							Calculated Target Floodplain Soil Levels (mg/kg) <sup>1</sup>						
		SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8
5A	K1	4.3	0.20	0.21	0.20	0.21	0.12	0.089	33	54	54	54	54	54	55
	K2	11	1.8	0.80	0.80	0.093	0.42	0.36	n/a	46	51	51	55	53	53
	K3	13	1.7	0.059	0.058	0.058	0.071	0.063	n/a	46	55	55	55	55	55
	K4	15	0.020	0.020	0.020	0.020	0.033	0.024	n/a	55	55	55	55	55	55
	K5	19	0.023	0.024	0.024	0.023	0.032	0.028	n/a	55	55	55	55	55	55
5B	K6	9.7	7.4	0.054	0.053	0.31	0.32	0.051	n/a	0.3	55	55	53	53	55
	K7	6.3	4.2	0.56	0.16	0.065	0.067	0.062	8.4	24	51	54	55	55	55
	K8	7.3	5.8	1.8	1.2	0.085	0.11	0.095	1.0	12	42	46	54	54	54
5C/D	K9	7.0	5.4	1.7	1.4	0.10	0.13	0.11	42	45	52	52	55	55	55
	K10	18	7.2	0.17	0.17	0.19	0.17	0.11	21	41	55	55	55	55	55
	K11	20	12	0.42	0.40	0.20	0.19	0.11	17	32	54	54	55	55	55
6	K12	19	1.8	0.23	0.21	0.22	0.22	0.16	20	52	55	55	55	55	55

**Notes:**

(n/a) denotes IMPG values not attainable given the predicted sediment level.

<sup>1</sup> Target floodplain soil levels calculated in accordance with method described in Appendix B to the CMS Report.

**Table GC24-2. Comprehensive evaluation of IMPG attainment for insectivorous birds (wood duck) for all combinations of SED and FP alternatives.<sup>1</sup>**

Reach	Averaging Area	Post-Remediation Floodplain EPC (FP 1)	Target Floodplain Soil Level (mg/kg)								Post-Remediation Floodplain EPC (FP 2)	Target Floodplain Soil Level (mg/kg)								Post-Remediation Floodplain EPC (FP 3)	Target Floodplain Soil Level (mg/kg)							
			SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2		SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3		SED 4	SED 5	SED 6	SED 7	SED 8			
5A	K1	29	33	54	54	54	54	54	55	28	33	54	54	54	54	54	55	21	33	54	54	54	54	54	55			
	K2	9.8	n/a	46	51	51	55	53	53	7.9	n/a	46	51	51	55	53	53	7.9	n/a	46	51	51	55	53	53			
	K3	53	n/a	46	55	55	55	55	55	26	n/a	46	55	55	55	55	55	19	n/a	46	55	55	55	55	55			
	K4	16	n/a	55	55	55	55	55	55	16	n/a	55	55	55	55	55	55	15	n/a	55	55	55	55	55	55			
	K5	22	n/a	55	55	55	55	55	55	21	n/a	55	55	55	55	55	55	18	n/a	55	55	55	55	55	55			
5B	K6	25	n/a	0.3	55	55	53	53	55	25	n/a	0.3	55	55	53	53	55	24	n/a	0.3	55	55	53	53	55			
	K7	30	8.4	24	51	54	55	55	55	28	8.4	24	51	54	55	55	55	22	8.4	24	51	54	55	55	55			
	K8	24	1.0	12	42	46	54	54	54	23	1.0	12	42	46	54	54	54	18	1.0	12	42	46	54	54	54			
5C/D	K9	25	42	45	52	52	55	55	55	25	42	45	52	52	55	55	55	23	42	45	52	52	55	55	55			
	K10	13	21	41	55	55	55	55	55	13	21	41	55	55	55	55	55	12	21	41	55	55	55	55	55			
	K11	14	17	32	54	54	55	55	55	14	17	32	54	54	55	55	55	14	17	32	54	54	55	55	55			
6	K12	23	20	52	55	55	55	55	55	23	20	52	55	55	55	55	55	23	20	52	55	55	55	55	55			

Reach	Averaging Area	Post-Remediation Floodplain EPC (FP 4)	Target Floodplain Soil Level (mg/kg)								Post-Remediation Floodplain EPC (FP 5)	Target Floodplain Soil Level (mg/kg)								Post-Remediation Floodplain EPC (FP 6)	Target Floodplain Soil Level (mg/kg)							
			SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2		SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3		SED 4	SED 5	SED 6	SED 7	SED 8			
5A	K1	17	33	54	54	54	54	54	55	16	33	54	54	54	54	54	55	5.3	33	54	54	54	54	54	55			
	K2	6.7	n/a	46	51	51	55	53	53	9.3	n/a	46	51	51	55	53	53	6.2	n/a	46	51	51	55	53	53			
	K3	18	n/a	46	55	55	55	55	55	14	n/a	46	55	55	55	55	55	5.9	n/a	46	55	55	55	55	55			
	K4	12	n/a	55	55	55	55	55	55	13	n/a	55	55	55	55	55	55	6.2	n/a	55	55	55	55	55	55			
	K5	14	n/a	55	55	55	55	55	55	18	n/a	55	55	55	55	55	55	9.2	n/a	55	55	55	55	55	55			
5B	K6	19	n/a	0.3	55	55	53	53	55	22	n/a	0.3	55	55	53	53	55	6.4	n/a	0.3	55	55	53	53	55			
	K7	22	8.4	24	51	54	55	55	55	17	8.4	24	51	54	55	55	55	6.4	8.4	24	51	54	55	55	55			
	K8	18	1.0	12	42	46	54	54	54	12	1.0	12	42	46	54	54	54	5.4	1.0	12	42	46	54	54	54			
5C/D	K9	17	42	45	52	52	55	55	55	12	42	45	52	52	55	55	55	7.8	42	45	52	52	55	55	55			
	K10	12	21	41	55	55	55	55	55	10	21	41	55	55	55	55	55	5.0	21	41	55	55	55	55	55			
	K11	13	17	32	54	54	55	55	55	11	17	32	54	54	55	55	55	6.6	17	32	54	54	55	55	55			
6	K12	15	20	52	55	55	55	55	55	12	20	52	55	55	55	55	55	5.0	20	52	55	55	55	55	55			

Reach	Averaging Area	Post-Remediation Floodplain EPC (FP 7)	Target Floodplain Soil Level (mg/kg)							
			SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	
5A	K1	3.4	33	54	54	54	54	54	55	
	K2	4.6	n/a	46	51	51	55	53	53	
	K3	2.7	n/a	46	55	55	55	55	55	
	K4	4.6	n/a	55	55	55	55	55	55	
	K5	6.0	n/a	55	55	55	55	55	55	
5B	K6	5.7	n/a	0.28	55	55	53	53	55	
	K7	4.5	8.4	24	51	54	55	55	55	
	K8	4.7	1.0	12	42	46	54	54	54	
5C/D	K9	8.3	42	45	52	52	55	55	55	
	K10	7.4	21	41	55	55	55	55	55	
	K11	6.1	17	32	54	54	55	55	55	
6	K12	11	20	52	55	55	55	55	55	

**Key**  
 = IMPG is attained

**Notes:**

<sup>1</sup> The floodplain EPCs presented in this table reflect revisions to those presented in the CMS Report due to changes made in response to EPA's Specific Comments 95, 98, 112, 113, and 115.

(n/a) denotes IMPG values not attainable given the predicted sediment level.

**Table GC24-3. Model-predicted sediment endpoint PCB concentrations used to calculate associated target floodplain soil levels for piscivorous mammals (mink)**

Averaging Area	Model-Predicted Sediment Endpoint PCB Concentrations (mg/kg)							Calculated Target Floodplain Soil Levels (mg/kg)													
								Lower Bound						Upper Bound							
	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8
Reaches 5A/5B	11	2.9	0.49	0.40	0.11	0.14	0.087	n/a	n/a	6.4	6.9	8.6	8.4	8.7	n/a	5.7	20	20	22	22	22
Reaches 5C/5D/6	17	6.2	0.54	0.42	0.19	0.19	0.13	n/a	n/a	7.8	8.0	8.4	8.4	8.6	n/a	9.4	20	21	21	21	21


**Notes:**

*(n/a) denotes IMPG values not attainable given the predicted sediment level.*

<sup>1</sup> *Target floodplain soil levels calculated in accordance with method described in Appendix C to the CMS Report.*

**Table GC24-4. Comprehensive evaluation of IMPG attainment for piscivorous mammals (mink) for all combinations of SED and FP alternatives.**

Floodplain Alternative	Averaging Area	Post-Remediation Floodplain EPC	Calculated Target Floodplain Soil Levels (mg/kg)															
			Lower Bound								Upper Bound							
			SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8	SED 1/2	SED 3	SED 4	SED 5	SED 6	SED 7	SED 8		
FP 1	Reaches 5A/5B	22	n/a	n/a	6.4	6.9	8.6	8.4	8.7	n/a	5.7	20	20	22	22	22		
	Reaches 5C/5D/6	17	n/a	n/a	7.8	8.0	8.4	8.4	8.6	n/a	9.4	20	21	21	21	21		
FP 2	Reaches 5A/5B	20	n/a	n/a	6.4	6.9	8.6	8.4	8.7	n/a	5.7	20	20	22	22	22		
	Reaches 5C/5D/6	17	n/a	n/a	7.8	8.0	8.4	8.4	8.6	n/a	9.4	20	21	21	21	21		
FP 3	Reaches 5A/5B	17	n/a	n/a	6.4	6.9	8.6	8.4	8.7	n/a	5.7	20	20	22	22	22		
	Reaches 5C/5D/6	15	n/a	n/a	7.8	8.0	8.4	8.4	8.6	n/a	9.4	20	21	21	21	21		
FP 4	Reaches 5A/5B	14	n/a	n/a	6.4	6.9	8.6	8.4	8.7	n/a	5.7	20	20	22	22	22		
	Reaches 5C/5D/6	14	n/a	n/a	7.8	8.0	8.4	8.4	8.6	n/a	9.4	20	21	21	21	21		
FP 5	Reaches 5A/5B	14	n/a	n/a	6.4	6.9	8.6	8.4	8.7	n/a	5.7	20	20	22	22	22		
	Reaches 5C/5D/6	10	n/a	n/a	7.8	8.0	8.4	8.4	8.6	n/a	9.4	20	21	21	21	21		
FP 6	Reaches 5A/5B	5.8	n/a	n/a	6.4	6.9	8.6	8.4	8.7	n/a	5.7	20	20	22	22	22		
	Reaches 5C/5D/6	5.9	n/a	n/a	7.8	8.0	8.4	8.4	8.6	n/a	9.4	20	21	21	21	21		
FP 7	Reaches 5A/5B	3.4	n/a	n/a	6.4	6.9	8.6	8.4	8.7	n/a	5.7	20	20	22	22	22		
	Reaches 5C/5D/6	6.7	n/a	n/a	7.8	8.0	8.4	8.4	8.6	n/a	9.4	20	21	21	21	21		

**Key**  
 = IMPG is attained

**Notes:**  
*(n/a)* denotes IMPG values not attainable given the predicted sediment level.



**Table SC27-1 - 2008 Housatonic River Adult Largemouth Bass Sampling PCB and % Lipids Data**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

Parameter	Sample ID: Date Collected:	5B/C-LMB-1 09/03/08	5B/C-LMB-2 09/03/08	5B/C-LMB-3 09/03/08	5B/C-LMB-4 09/03/08	5B/C-LMB-5 09/03/08	5B/C-LMB-6 09/03/08	5B/C-LMB-7 09/03/08	5B/C-LMB-8 09/03/08	5B/C-LMB-9 09/03/08	5B/C-LMB-10 09/03/08
<b>PCB Congeners</b>											
Total PCB Congeners-offal		63	120	110	120	34	15	14	50	63	54
Total PCB Congeners-fillet		4.2	4.5	9.5	5.3	1.2	1.3	1.5	5.1	8.9	9.3
<b>Conventionals</b>											
%Lipids-offal		5.6	7.0	5.6	8.8	4.9	2.3	3.9	5.6	7.6	7.3
%Lipids-fillet		0.49	0.81	1.1	0.52	1.1	0.48	1.1	0.85	1.6	2.8

Parameter	Sample ID: Date Collected:	5B/C-LMB-11 09/04/08	5B/C-LMB-12 09/04/08	5B/C-LMB-13 09/04/08	5B/C-LMB-14 09/04/08	5B/C-LMB-15 09/04/08	WP-LMB-1 09/04/08	WP-LMB-2 09/04/08	WP-LMB-3 09/04/08	WP-LMB-4 09/04/08	WP-LMB-5 09/04/08
<b>PCB Congeners</b>											
Total PCB Congeners-offal		73	74	48	30	110	79	59	54	54	79
Total PCB Congeners-fillet		3.2	8.0	1.8	3.1	9.5	4.7	1.2	1.3	0.56	2.3
<b>Conventionals</b>											
%Lipids-offal		4.6	3.3	3.8	5.6	6.3	4.5	3.3	3.0	2.8	4.2
%Lipids-fillet		0.46	0.70	0.29	1.6	0.93	0.37	0.12	0.097	0.050	0.14

Parameter	Sample ID: Date Collected:	WP-LMB-6 09/04/08	WP-LMB-7 09/04/08	WP-LMB-8 09/04/08	WP-LMB-9 09/04/08	WP-LMB-10 09/04/08	WP-LMB-11 09/04/08	WP-LMB-12 09/04/08	WP-LMB-13 09/04/08	WP-LMB-14 09/04/08	WP-LMB-15 09/04/08
<b>PCB Congeners</b>											
Total PCB Congeners-offal		53	65	62	35	67	63	39	150	74	39
Total PCB Congeners-fillet		1.5	0.52	0.53	2.5 J	0.78	0.89	0.39	1.5	1.5	0.76
<b>Conventionals</b>											
%Lipids-offal		4.1	1.8	4.8	2.8	3.4	2.3	2.5	3.9	4.6	3.5
%Lipids-fillet		0.12	0.069	0.092	0.44	0.16	0.10	0.098	0.095	0.25	0.11

Parameter	Sample ID: Date Collected:	RP-LMB-1 09/04/08	RP-LMB-2 09/04/08	RP-LMB-3 09/04/08	RP-LMB-4 09/04/08	RP-LMB-5 09/04/08	RP-LMB-6 09/04/08	RP-LMB-7 09/04/08	RP-LMB-8 09/04/08	RP-LMB-9 09/04/08	RP-LMB-10 09/05/08
<b>PCB Congeners</b>											
Total PCB Congeners-offal		26	34	31	46	37	56	49	23	52	70
Total PCB Congeners-fillet		5.4	2.3	1.9	1.2	2.7	3.0	9.3	4.0	1.1	2.2
<b>Conventionals</b>											
%Lipids-offal		4.1	4.6	3.3	4.2	3.8	1.3	5.1	3.8	2.6	3.4
%Lipids-fillet		0.91	0.37	0.41	0.26	0.23	0.26	0.16	1.1	0.26	0.24

**Notes:**

1. Samples were collected by ARCADIS, and submitted to Northeast Analytical, Inc. for analysis of PCBs and % Lipids.
2. Samples have been validated as per Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP), General Electric Company, Pittsfield, Massachusetts, ARCADIS (approved March 15, 2007 and re-submitted March 30, 2007).
3. Total PCB Congeners results are presented in parts per million, ppm.
4. Sample ID prefix represents associated river reach (5B/C - reach 5B/C; WP - Woods Pond; RP - Rising Pond).

**Data Qualifiers:**

J - Indicates that the associated numerical value is an estimated concentration.

**Table SC27-2 - 2008 Housatonic River YOY Sample Results**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

Sample ID	Date Collected	Fish Species	Aroclor-1016 -1221, -1232 -1242, -1248 (mg/kg)	Aroclor-1254 (mg/kg)	Aroclor-1260 (mg/kg)	Total PCB (mg/kg)	Percent Lipid (%)
<b>HR2</b>							
HR2-LB-183	9/29/2008	LB	ND(5.0)	6.8	12	18.8	2.6
HR2-LB-184	9/29/2008	LB	ND(2.5)	3.7	7.3	11	2.4
HR2-LB-185	9/29/2008	LB	ND(5.0)	6.8	13	19.8	2.7
HR2-LB-186	9/29/2008	LB	ND(5.0)	6.5	12	18.5	2.8
HR2-LB-187	9/29/2008	LB	ND(5.0)	5.8	11	16.8	2.7
HR2-LB-188	9/29/2008	LB	ND(5.0)	5.4	10	15.4	2.5
HR2-LB-189	9/29/2008	LB	ND(5.0)	5.8	11	16.8	2.9
HR2-YP-190	9/29/2008	YP	ND(5.0)	5.9	11	16.9	2.8
HR2-YP-191	9/29/2008	YP	ND(6.7)	8.0	18	26	2.0
HR2-YP-192	9/29/2008	YP	ND(3.3)	5.5	9.7	15.2	2.4
HR2-YP-193	9/29/2008	YP	ND(3.3)	4.7	8.7	13.4	2.1
HR2-YP-194	9/29/2008	YP	ND(3.3)	4.8	9.0	13.8	1.7
HR2-YP-195	9/29/2008	YP	ND(5.0)	6.0	11	17	2.1
HR2-YP-196	9/29/2008	YP	ND(5.0)	ND(5.0)	9.0	9	1.8
HR2-BG-197	9/29/2008	BG	ND(2.0)	3.0	4.5	7.5	3.0
HR2-BG-198	9/29/2008	BG	ND(2.0)	3.3	5.3	8.6	3.0
HR2-BG-199	9/29/2008	BG	ND(2.0)	3.4	5.3	8.7	2.8
HR2-BG-200	9/30/2008	BG	ND(2.0)	2.9	4.6	7.5	2.6
HR2-BG-264	10/2/2008	BG	ND(1.8)	3.4	5.6	9	3.6
HR2-BG-265	10/2/2008	BG	ND(2.0)	3.2	5.5	8.7	3.3
HR2-BG-266	10/2/2008	BG	ND(1.7)	2.8	4.6	7.4	3.3
<b>Woods Pond</b>							
WP-LB-201	9/30/2008	LB	ND(5.0)	8.1	13	21.1	1.8
WP-LB-202	9/30/2008	LB	ND(5.0)	5.8	9.8	15.6	2.3
WP-LB-203	9/30/2008	LB	ND(5.0)	7.8	13	20.8	2.1
WP-LB-204	9/30/2008	LB	ND(5.0)	6.3	10	16.3	1.9
WP-LB-205	9/30/2008	LB	ND(5.0)	9.2	16	25.2	2.0
WP-LB-206	9/30/2008	LB	ND(5.0)	9.3	16	25.3	1.8
WP-LB-207	9/30/2008	LB	ND(5.0)	9.1	14	23.1	2.0
WP-YP-208	9/30/2008	YP	ND(2.5)	4.6	7.6	12.2	1.9
WP-YP-209	9/30/2008	YP	ND(5.0)	6.4	11	17.4	2.5
WP-YP-210	9/30/2008	YP	ND(5.0)	14	23	37	2.8
WP-YP-211	9/30/2008	YP	ND(5.0)	7.3	12	19.3	2.7
WP-YP-212	9/30/2008	YP	ND(5.0)	6.7	11	17.7	2.6
WP-YP-213	9/30/2008	YP	ND(5.0)	7.2	12	19.2	2.8
WP-YP-214	9/30/2008	YP	ND(5.0)	6.2	9.8	16	2.6
WP-BG-215	9/30/2008	BG	ND(3.3)	4.9	7.6	12.5	2.8
WP-BG-216	9/30/2008	BG	ND(2.5)	4.9	7.7	12.6	2.8
WP-BG-217	9/30/2008	BG	ND(3.3)	5.0	7.5	12.5	2.8
WP-BG-218	9/30/2008	BG	ND(3.3)	6.1	9.5	15.6	3.7
WP-BG-219	9/30/2008	BG	ND(1.3)	3.7	5.7	9.4	2.3
WP-BG-220	9/30/2008	BG	ND(1.3)	3.9	6.0	9.9	2.0
WP-BG-221	9/30/2008	BG	ND(3.3)	5.3	8.1	13.4	2.8

**Table SC27-2 - 2008 Housatonic River YOY Sample Results**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

Sample ID	Date Collected	Fish Species	Aroclor-1016 -1221, -1232 -1242, -1248 (mg/kg)	Aroclor- 1254 (mg/kg)	Aroclor- 1260 (mg/kg)	Total PCB (mg/kg)	Percent Lipid (%)
<b>Glendale Dam</b>							
GD-LB-243	10/1/2008	LB	ND(1.5)	2.2	4.4	6.6	2.5
GD-LB-244	10/1/2008	LB	ND(1.5)	2.3	4.1	6.4	2.3
GD-LB-245	10/1/2008	LB	ND(1.5)	2.0	3.4	5.4	2.6
GD-LB-246	10/1/2008	LB	ND(1.5)	1.7	3.0	4.7	2.3
GD-LB-247	10/1/2008	LB	ND(1.5)	1.7	2.8	4.5	2.5
GD-LB-248	10/1/2008	LB	ND(1.5)	1.9	3.2	5.1	2.5
GD-LB-249	10/1/2008	LB	ND(1.5)	2.5	4.8	7.3	2.6
GD-YP-250	10/1/2008	YP	ND(1.5)	2.4	4.2	6.6	2.1
GD-YP-251	10/1/2008	YP	ND(1.5)	2.8	4.5	7.3	2.4
GD-YP-252	10/1/2008	YP	ND(1.5)	2.3	3.9	6.2	2.4
GD-YP-253	10/1/2008	YP	ND(1.5)	1.9	3.4	5.3	1.7
GD-YP-254	10/1/2008	YP	ND(1.5)	2.3	3.8	6.1	2.4
GD-YP-255	10/1/2008	YP	R	4.3J	6.9J	11.2J	3.0
GD-YP-256	10/1/2008	YP	ND(1.5)	2.7	4.7	7.4	3.2
GD-BG-257	10/1/2008	BG	ND(1.0)	1.4	1.7	3.1	2.7
GD-BG-258	10/1/2008	BG	ND(1.0)	1.5	1.6	3.1	2.9
GD-BG-259	10/1/2008	BG	ND(1.4)	1.6	1.8	3.4	2.8
GD-BG-260	10/1/2008	BG	ND(1.0)	1.5	1.6	3.1	3.2
GD-BG-261	10/1/2008	BG	ND(1.1)	1.6	1.7	3.3	2.8
GD-BG-262	10/1/2008	BG	ND(1.0)	1.3	1.3	2.6	2.4
GD-BG-263	10/1/2008	BG	ND(1.0)	1.5	1.6	3.1	2.6
<b>HR6</b>							
HR6-LB-222	9/30/2008	LB	ND(0.33)	0.40	0.74	1.14	1.0
HR6-LB-223	9/30/2008	LB	ND(0.51)	0.84	1.7	2.54	2.6
HR6-LB-224	9/30/2008	LB	ND(1.1)	ND(1.1)	2.1	2.1	3.0
HR6-LB-225	9/30/2008	LB	ND(0.50)	0.74	1.3	2.04	2.4
HR6-LB-226	9/30/2008	LB	ND(0.52)	0.74	1.3	2.04	3.2
HR6-LB-227	9/30/2008	LB	ND(0.50)	0.80	1.4	2.2	3.0
HR6-LB-228	9/30/2008	LB	ND(0.37)	0.79	1.6	2.39	2.9
HR6-YP-229	9/30/2008	YP	ND(0.66)	1.1	2.1	3.2	2.3
HR6-YP-230	9/30/2008	YP	ND(1.0)	ND(1.0)	1.9	1.9	1.9
HR6-YP-231	9/30/2008	YP	ND(1.0)	ND(1.0)	1.9	1.9	2.0
HR6-YP-232	9/30/2008	YP	ND(1.0)	1.1	2.0	3.1	2.0
HR6-YP-233	9/30/2008	YP	ND(1.0)	ND(1.0)	1.9	1.9	2.1
HR6-YP-234	9/30/2008	YP	ND(1.0)	1.2	2.2	3.4	2.3
HR6-YP-235	9/30/2008	YP	ND(1.0)	1.0	1.9	2.9	2.3
HR6-BG-236	9/30/2008	BG	ND(0.68)	1.0	1.9	2.9	4.4
HR6-BG-237	9/30/2008	BG	ND(0.39)	0.78	1.4	2.18	3.4
HR6-BG-238	9/30/2008	BG	ND(0.40)	0.84	1.5	2.34	3.6
HR6-BG-239	9/30/2008	BG	ND(0.32)	0.69	1.2	1.89	3.7
HR6-BG-240	9/30/2008	BG	ND(0.34)	0.89	1.6	2.49	3.9
HR6-BG-241	9/30/2008	BG	ND(0.33)	0.82	1.5	2.32	3.3
HR6-BG-242	9/30/2008	BG	ND(0.31)	0.81	1.4	2.21	3.5

**Notes:**

1. Samples were collected by ARCADIS and submitted to Pace Analytical Services, Inc. for analysis of PCBs and % Lipids.
2. Samples have been validated as per Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP), General Electric Company, Pittsfield, Massachusetts, ARCADIS (approved March 15, 2007 and resubmitted March 30, 2007).
3. ND - Analyte was not detected. The number in parentheses is the associated detection limit.

**Data Qualifiers:**

- J - Indicates that the associated numerical value is an estimated concentration.
- R - Data was rejected due to a deficiency in the data generation process.

**Units:**

mg/kg - milligram per kilogram (ppm - parts per million)

**Species:**

- LB - Largemouth bass
- YP - Yellow perch
- BG - Bluegill

**Table SC27-3 - Comparison of Mean Total and Mean Lipid-Normalized PCB Concentrations in YOY Fish Tissue [1]**

Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
 General Electric Company - Pittsfield, MA

Location		Species	n	Lipid (%)	Total PCB [2,3,4] (mg/kg)	Lipid-Normalized PCB [3] (mg/kg-lipid)
Year						
<b>HR2</b>						
<b>Largemouth Bass [5]</b>						
1994	7			2.8 (0.2)	32 (3.6)	1158 (108)
1996	7			2.9 (0.3)	28 (5.4)	956 (152)
1998	7			3.0 (0.2)	19 (1.1)	651 (72)
2000	7			3.0 (1.0)	32 (6.2)	1168 (389)
2002	7			3.6 (0.2)	21 (1.6)	594 (64)
2004	7			3.2 (0.3)	20 (5.3)	615 (185)
2006	5			2.5 (0.5)	21 (2.6)	869 (138)
2008	7			2.7 (0.2)	17 (2.9)	628 (94)
<b>Yellow Perch</b>						
1994	7			2.5 (0.1)	25 (1.6)	999 (88)
1996	7			3.2 (0.2)	27 (4.0)	848 (83)
1998	7			2.8 (0.2)	26 (4.2)	939 (217)
2000	7			2.8 (0.3)	33 (3.1)	1193 (66)
2002	4			2.3 (0.5)	25 (1.8)	1118 (177)
2004	7			2.6 (0.2)	31 (3.7)	1189 (88)
2006	0			----	----	----
2008	7			2.1 (0.4)	16 (5.2)	757 (264)
<b>Bluegill/Pumpkinseed [6]</b>						
1994	7			3.8 (0.5)	25 (1.4)	665 (77)
1996	7			3.5 (0.2)	29 (1.3)	839 (63)
1998	7			3.1 (0.2)	21 (8.6)	698 (309)
2000	7			4.2 (0.3)	33 (4.6)	792 (106)
2002	7			3.0 (0.4)	13 (3.6)	442 (75)
2004	7			4.0 (0.3)	19 (2.7)	464 (61)
2006	7			2.9 (0.2)	13 (1.4)	443 (31)
2008	7			3.1 (0.3)	8.2 (0.7)	268 (29)
<b>WOODS POND</b>						
<b>Largemouth Bass</b>						
1994	7			2.1 (0.5)	23 (8.1)	1178 (444)
1996	7			3.2 (0.2)	22 (2.0)	690 (63)
1998	7			2.5 (0.3)	32 (4.6)	1323 (200)
2000	7			2.6 (0.2)	24 (2.4)	910 (73)
2002	7			2.7 (0.2)	17 (1.3)	626 (37)
2004	7			3.3 (0.4)	31 (3.9)	928 (75)
2006	7			2.5 (0.3)	32 (2.7)	1295 (252)
2008	7			2.0 (0.2)	21 (3.9)	1074 (249)
<b>Yellow Perch</b>						
1994	7			2.6 (0.7)	38 (9.3)	1836 (1574)
1996	7			4.4 (0.4)	29 (3.1)	662 (23)
1998	7			2.4 (0.2)	29 (4.4)	1235 (226)
2000	7			3.3 (0.3)	30 (2.0)	934 (104)
2002	2			2.3 (0.1)	14 (2.8)	598 (98)
2004	7			3.4 (0.1)	29 (2.8)	842 (67)
2006	7			2.8 (0.3)	25 (2.4)	903 (106)
2008	7			2.6 (0.3)	20 (7.9)	765 (248)
<b>Bluegill/Pumpkinseed [6]</b>						
1994	7			2.8 (1.0)	17 (6.4)	601 (37)
1996	7			3.9 (0.4)	22 (2.3)	563 (79)
1998	7			2.8 (0.4)	17 (2.1)	622 (178)
2000	7			4.6 (0.2)	28 (3.3)	601 (64)
2002	7			4.5 (0.3)	15 (1.5)	329 (43)
2004	7			3.4 (0.2)	17 (1.0)	497 (20)
2006	7			3.7 (0.2)	18 (1.4)	499 (46)
2008	7			2.7 (0.5)	12 (2.1)	450 (30)

**Table SC27-3 - Comparison of Mean Total and Mean Lipid-Normalized PCB Concentrations in YOY Fish Tissue [1]**

Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
 General Electric Company - Pittsfield, MA

Location					
Species		Lipid	Total PCB [2,3,4]	Lipid-Normalized PCB [3]	
Year	n	(%)	(mg/kg)	(mg/kg-lipid)	
<b>GLENDALE DAM [7]</b>					
<b>Largemouth Bass</b>					
1996	7	3.0 (0.2)	7.9 (0.9)	265 (29)	
1998	7	2.7 (0.2)	5.2 (1.3)	198 (58)	
2000	7	3.9 (0.2)	16 (1.0)	402 (36)	
2002	7	2.9 (0.3)	3.5 (0.3)	121 (8)	
2004	7	3.4 (0.1)	6.8 (0.7)	198 (25)	
2006	7	2.6 (0.2)	6.1 (0.8)	234 (26)	
2008	7	2.5 (0.1)	5.7 (1.1)	231 (42)	
<b>Yellow Perch</b>					
1996	7	3.4 (0.3)	11 (1.7)	323 (37)	
1998	7	2.8 (0.3)	11 (1.4)	382 (43)	
2000	7	3.2 (0.2)	15 (1.0)	461 (25)	
2002	0	----	----	----	
2004	7	3.3 (0.5)	14 (4.7)	403 (112)	
2006	0	----	----	----	
2008	7	2.5 (0.5)	7.2 (1.9)	292 (48)	
<b>Bluegill/Pumpkinseed [6]</b>					
1996	7	4.1 (0.2)	8.4 (1.2)	205 (23)	
1998	8	2.7 (1.0)	2.5 (0.3)	115 (79)	
2000	7	4.9 (0.5)	16 (2.1)	317 (36)	
2002	7	3.8 (0.4)	3.2 (0.7)	83 (13)	
2004	7	4.7 (0.4)	6.0 (0.2)	128 (8)	
2006	7	3.7 (1.2)	5.6 (2.3)	149 (16)	
2008	7	2.8 (0.2)	3.1 (0.3)	112 (9)	
<b>HR6</b>					
<b>Largemouth Bass</b>					
1994	7	3.2 (0.2)	4.3 (0.5)	136 (20)	
1996	7	3.6 (0.3)	3.4 (0.3)	95 (8)	
1998	7	3.0 (0.3)	2.5 (0.4)	83 (17)	
2000	7	3.2 (0.3)	3.4 (0.6)	108 (24)	
2002	7	2.9 (0.1)	1.9 (0.1)	66 (5)	
2004	7	3.1 (0.3)	2.6 (0.8)	84 (32)	
2006	7	3.2 (1.2)	2.8 (1.2)	85 (22)	
2008	7	2.6 (0.7)	2.1 (0.4)	84 (17)	
<b>Yellow Perch</b>					
1994	7	2.9 (0.2)	4.5 (0.2)	158 (13)	
1996	7	2.6 (0.2)	3.3 (0.2)	128 (20)	
1998	7	2.5 (0.2)	3.2 (0.7)	131 (34)	
2000	7	2.7 (0.2)	4.1 (0.6)	153 (18)	
2002	4	2.4 (0.4)	2.5 (0.2)	102 (14)	
2004	7	2.5 (0.2)	4.4 (0.7)	179 (29)	
2006	7	2.7 (0.4)	3.1 (1.4)	115 (46)	
2008	7	2.1 (0.2)	2.6 (0.7)	122 (27)	
<b>Bluegill/Pumpkinseed [6]</b>					
1994	7	4.2 (0.4)	3.5 (0.5)	83 (10)	
1996	7	3.7 (0.2)	1.5 (0.6)	41 (15)	
1998	5	3.8 (0.6)	2.1 (0.7)	55 (11)	
2000	8	3.9 (0.3)	3.9 (0.6)	106 (19)	
2002	7	3.0 (0.6)	1.9 (0.2)	66 (14)	
2004	7	3.7 (0.3)	2.9 (0.9)	77 (21)	
2006	7	3.4 (0.2)	3.0 (0.6)	89 (15)	
2008	7	3.7 (0.4)	2.3 (0.3)	63 (6)	

**Table SC27-3 - Comparison of Mean Total and Mean Lipid-Normalized PCB Concentrations in YOY Fish Tissue [1]**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

Notes:

- [1] Arithmetic mean concentrations (and standard deviation) for whole-body composite samples. Means (and standard deviations) were calculated from sample results. Most samples were comprised of 5 to 15 fish.
- [2] Total PCBs represented by Aroclors 1254 and 1260.
- [3] Mean total PCB and lipid-normalized PCB concentrations reported on a wet-weight basis.
- [4] Data have been reviewed and qualified following protocols contained in the Field Sampling Plan/Quality Assurance Project Plan (FSP/QAPP), General Electric Company, Pittsfield, Massachusetts, ARCADIS (approved March 15, 2007 and resubmitted March 30, 2007).
- [5] Seven largemouth bass samples from HR2 were submitted for analysis in 2006, but two of the samples were rejected during data validation, and as such, only five sample results are reported.
- [6] Pumpkinseed were collected as a substitute species for bluegill when bluegill were not available.
- [7] Glendale Dam was not sampled in 1994.

n = number of samples

mg/kg = milligram per kilogram (ppm - parts per million)

mg/kg - lipid = Total PCB divided by percent lipid times 100 (ppm - parts per million).

---- = no fish collected (the fish species was not available at the time of collection).

**Table SC38-1. IMPGs for human consumption of fish tissue compared to projected fillet-based fish PCBs calculated using EPA's "blended" fish method (top panel) and the sole use of largemouth bass (bottom panel) (SED1 / SED 2).**




Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																		
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH	
					7.9	9.5	8.0	9.8	8.6	6.0	6.0	6.1	5.3	3.9	3.1	3.4	2.6	3.6	0.2	0.1	0.08	0.08	
Blended Fish Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019																			
			Cancer @ 10 <sup>-5</sup>	0.019																			
			Cancer @ 10 <sup>-4</sup>	0.19																			
			Non-Cancer -- Child	0.026																			
		Non-Cancer -- Adult	0.062																				
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																			
			Cancer @ 10 <sup>-5</sup>	0.49																			
			Cancer @ 10 <sup>-4</sup>	4.9																			
	Non-Cancer -- Child		0.19																				
	Non-Cancer -- Adult	0.43																					
	Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064																			
			Cancer @ 10 <sup>-5</sup>	0.064																			
			Cancer @ 10 <sup>-4</sup>	0.64																			
			Non-Cancer -- Child	0.059																			
		Non-Cancer -- Adult	0.12																				
		CTE (50th percentile)	Cancer @ 10 <sup>-6</sup>	0.057																			
Cancer @ 10 <sup>-5</sup>			0.57																				
Cancer @ 10 <sup>-4</sup>			5.7																				
Non-Cancer -- Child	0.71																						
Non-Cancer -- Adult	1.5																						

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																	
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH
					7.3	9.3	7.4	9.5	8.6	6.4	5.7	6.3	5.5	4.1	3.2	3.5	2.8	3.6	0.2	0.1	0.08	0.08
Bass Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019																		
			Cancer @ 10 <sup>-5</sup>	0.019																		
			Cancer @ 10 <sup>-4</sup>	0.19																		
			Non-Cancer -- Child	0.026																		
		Non-Cancer -- Adult	0.062																			
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																		
			Cancer @ 10 <sup>-5</sup>	0.49																		
			Cancer @ 10 <sup>-4</sup>	4.9																		
	Non-Cancer -- Child		0.19																			
	Non-Cancer -- Adult	0.43																				
	Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064																		
			Cancer @ 10 <sup>-5</sup>	0.064																		
			Cancer @ 10 <sup>-4</sup>	0.64																		
			Non-Cancer -- Child	0.059																		
		Non-Cancer -- Adult	0.12																			
		CTE (50th percentile)	Cancer @ 10 <sup>-6</sup>	0.057																		
Cancer @ 10 <sup>-5</sup>			0.57																			
Cancer @ 10 <sup>-4</sup>			5.7																			
Non-Cancer -- Child	0.71																					
Non-Cancer -- Adult	1.5																					

**Notes**

<sup>1</sup> Model endpoint concentrations after 52-year projection (autumn average); whole body concentrations divided by a factor of 5.0 to convert to fillet basis. Results for CT impoundment are highly uncertain as they were estimated from the CT 1-D Analysis.  
 BBD: Bulls Bridge Dam Impoundment  
 LL: Lake Lillionah  
 LZ: Lake Zoar  
 LH: Lake Housatonic

**Key**

 = model prediction is lower than the IMPG  
 = model prediction is lower than the cancer IMPG, but is not lower than the corresponding non-cancer IMPGs  
 = model prediction exceeds the IMPG  
 CTE = central tendency exposure  
 RME = reasonable maximum exposure

**Table SC38-2. IMPGs for human consumption of fish tissue compared to projected fillet-based fish PCBs calculated using EPA's "blended" fish method (top panel) and the sole use of largemouth bass (bottom panel) (SED 3).**

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																			
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH		
Blended Fish Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019	0.24	3.5	2.1	6.4	0.73	1.2	2.5	1.9	1.4	1.0	0.84	1.4	0.72	1.7	0.04	0.03	0.02	0.02		
			Cancer @ 10 <sup>-5</sup>	0.019																				
			Cancer @ 10 <sup>-4</sup>	0.19																				
			Non-Cancer -- Child	0.026																				
			Non-Cancer -- Adult	0.062																				
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																				
			Cancer @ 10 <sup>-5</sup>	0.49																				
			Cancer @ 10 <sup>-4</sup>	4.9																				
			Non-Cancer -- Child	0.19																				
			Non-Cancer -- Adult	0.43																				
	Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064																				
			Cancer @ 10 <sup>-5</sup>	0.064																				
			Cancer @ 10 <sup>-4</sup>	0.64																				
			Non-Cancer -- Child	0.059																				
			Non-Cancer -- Adult	0.12																				
		CTE (50th percentile)	Cancer @ 10 <sup>-6</sup>	0.057																				
			Cancer @ 10 <sup>-5</sup>	0.57																				
			Cancer @ 10 <sup>-4</sup>	5.7																				
			Non-Cancer -- Child	0.71																				
			Non-Cancer -- Adult	1.5																				

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																			
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH		
Bass Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019	0.25	3.0	1.8	6.3	0.71	1.3	2.1	1.8	1.4	1.0	0.82	1.3	0.72	1.6	0.04	0.03	0.02	0.02		
			Cancer @ 10 <sup>-5</sup>	0.019																				
			Cancer @ 10 <sup>-4</sup>	0.19																				
			Non-Cancer -- Child	0.026																				
			Non-Cancer -- Adult	0.062																				
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																				
			Cancer @ 10 <sup>-5</sup>	0.49																				
			Cancer @ 10 <sup>-4</sup>	4.9																				
			Non-Cancer -- Child	0.19																				
			Non-Cancer -- Adult	0.43																				
	Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064																				
			Cancer @ 10 <sup>-5</sup>	0.064																				
			Cancer @ 10 <sup>-4</sup>	0.64																				
			Non-Cancer -- Child	0.059																				
			Non-Cancer -- Adult	0.12																				
		CTE (50th percentile)	Cancer @ 10 <sup>-6</sup>	0.057																				
			Cancer @ 10 <sup>-5</sup>	0.57																				
			Cancer @ 10 <sup>-4</sup>	5.7																				
			Non-Cancer -- Child	0.71																				
			Non-Cancer -- Adult	1.5																				

**Notes**

<sup>1</sup> Model endpoint concentrations after 52-year projection (autumn average); whole body concentrations divided by a factor of 5.0 to convert to fillet basis. Results for CT impoundment are highly uncertain as they were estimated from the CT 1-D Analysis.  
 BBD: Bulls Bridge Dam Impoundment  
 LL: Lake Lillionah  
 LZ: Lake Zoar  
 LH: Lake Housatonic

**Key**

- = model prediction is lower than the IMPG
  - = model prediction is lower than the cancer IMPG, but is not lower than the corresponding non-cancer IMPGs
  - = model prediction exceeds the IMPG
- CTE = central tendency exposure  
 RME = reasonable maximum exposure



**Table SC38-3. IMPGs for human consumption of fish tissue compared to projected fillet-based fish PCBs calculated using EPA's "blended" fish method (top panel) and the sole use of largemouth bass (bottom panel) (SED 4).**

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																	
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH
					0.25	0.41	0.47	0.38	0.22	0.52	2.1	1.2	0.94	0.66	0.56	1.2	0.48	1.5	0.02	0.01	0.01	0.01
Blended Fish Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019																		
			Cancer @ 10 <sup>-5</sup>	0.019																		
			Cancer @ 10 <sup>-4</sup>	0.19																		
		Non-Cancer -- Child	0.026																			
		Non-Cancer -- Adult	0.062																			
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																		
	Cancer @ 10 <sup>-5</sup>		0.49																			
	Cancer @ 10 <sup>-4</sup>		4.9																			
	Non-Cancer -- Child		0.19																			
	Non-Cancer -- Adult		0.43																			
	Probabilistic		RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064																	
		Cancer @ 10 <sup>-5</sup>		0.064																		
		Cancer @ 10 <sup>-4</sup>		0.64																		
		Non-Cancer -- Child		0.059																		
		Non-Cancer -- Adult		0.12																		
		CTE (50th percentile)		Cancer @ 10 <sup>-6</sup>	0.057																	
			Cancer @ 10 <sup>-5</sup>	0.57																		
			Cancer @ 10 <sup>-4</sup>	5.7																		
Non-Cancer -- Child			0.71																			
Non-Cancer -- Adult			1.5																			

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																	
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH
					0.26	0.39	0.42	0.40	0.23	0.50	1.6	1.1	0.84	0.62	0.52	1.1	0.46	1.3	0.02	0.01	0.01	0.01
Bass Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019																		
			Cancer @ 10 <sup>-5</sup>	0.019																		
			Cancer @ 10 <sup>-4</sup>	0.19																		
		Non-Cancer -- Child	0.026																			
		Non-Cancer -- Adult	0.062																			
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																		
	Cancer @ 10 <sup>-5</sup>		0.49																			
	Cancer @ 10 <sup>-4</sup>		4.9																			
	Non-Cancer -- Child		0.19																			
	Non-Cancer -- Adult		0.43																			
	Probabilistic		RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064																	
		Cancer @ 10 <sup>-5</sup>		0.064																		
		Cancer @ 10 <sup>-4</sup>		0.64																		
		Non-Cancer -- Child		0.059																		
		Non-Cancer -- Adult		0.12																		
		CTE (50th percentile)		Cancer @ 10 <sup>-6</sup>	0.057																	
			Cancer @ 10 <sup>-5</sup>	0.57																		
			Cancer @ 10 <sup>-4</sup>	5.7																		
Non-Cancer -- Child			0.71																			
Non-Cancer -- Adult			1.5																			

**Notes**

<sup>1</sup> Model endpoint concentrations after 52-year projection (autumn average); whole body concentrations divided by a factor of 5.0 to convert to fillet basis. Results for CT impoundment are highly uncertain as they were estimated from the CT 1-D Analysis.  
 BBD: Bulls Bridge Dam Impoundment  
 LL: Lake Lillimonah  
 LZ: Lake Zoar  
 LH: Lake Housatonic

**Key**

- = model prediction is lower than the IMPG
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  - = model prediction exceeds the IMPG
- CTE = central tendency exposure  
 RME = reasonable maximum exposure

**Table SC38-4. IMPGs for human consumption of fish tissue compared to projected fillet-based fish PCBs calculated using EPA's "blended" fish method (top panel) and the sole use of largemouth bass (bottom panel) (SED 5).**

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																		
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH	
					0.25	0.22	0.17	0.35	0.18	0.45	2.0	1.2	0.89	0.61	0.52	1.1	0.45	0.35	0.01	0.009	0.006	0.006	
Blended Fish Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019																			
			Cancer @ 10 <sup>-5</sup>	0.019																			
			Cancer @ 10 <sup>-4</sup>	0.19																			
			Non-Cancer -- Child	0.026																			
			Non-Cancer -- Adult	0.062																			
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																			
			Cancer @ 10 <sup>-5</sup>	0.49																			
			Cancer @ 10 <sup>-4</sup>	4.9																			
			Non-Cancer -- Child	0.19																			
			Non-Cancer -- Adult	0.43																			
	Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064																			
			Cancer @ 10 <sup>-5</sup>	0.064																			
			Cancer @ 10 <sup>-4</sup>	0.64																			
			Non-Cancer -- Child	0.059																			
		CTE (50th percentile)	Non-Cancer -- Adult	0.12																			
			Cancer @ 10 <sup>-6</sup>	0.057																			
			Cancer @ 10 <sup>-5</sup>	0.57																			
			Cancer @ 10 <sup>-4</sup>	5.7																			
Non-Cancer -- Child	0.71																						
Non-Cancer -- Adult	1.5																						

-3.858241

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																		
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH	
					0.26	0.23	0.17	0.36	0.18	0.42	1.6	1.0	0.79	0.57	0.49	1.0	0.43	0.34	0.01	0.009	0.006	0.006	
Bass Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019																			
			Cancer @ 10 <sup>-5</sup>	0.019																			
			Cancer @ 10 <sup>-4</sup>	0.19																			
			Non-Cancer -- Child	0.026																			
			Non-Cancer -- Adult	0.062																			
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																			
			Cancer @ 10 <sup>-5</sup>	0.49																			
			Cancer @ 10 <sup>-4</sup>	4.9																			
			Non-Cancer -- Child	0.19																			
			Non-Cancer -- Adult	0.43																			
	Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064																			
			Cancer @ 10 <sup>-5</sup>	0.064																			
			Cancer @ 10 <sup>-4</sup>	0.64																			
			Non-Cancer -- Child	0.059																			
		CTE (50th percentile)	Non-Cancer -- Adult	0.12																			
			Cancer @ 10 <sup>-6</sup>	0.057																			
			Cancer @ 10 <sup>-5</sup>	0.57																			
			Cancer @ 10 <sup>-4</sup>	5.7																			
Non-Cancer -- Child	0.71																						
Non-Cancer -- Adult	1.5																						

**Notes**

<sup>1</sup> Model endpoint concentrations after 52-year projection (autumn average); whole body concentrations divided by a factor of 5.0 to convert to fillet basis. Results for CT impoundment are highly uncertain as they were estimated from the CT 1-D Analysis.  
 BBD: Bulls Bridge Dam Impoundment  
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**Key**

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  - = model prediction exceeds the IMPG
- CTE = central tendency exposure  
 RME = reasonable maximum exposure

**Table SC38-5. IMPGs for human consumption of fish tissue compared to projected fillet-based fish PCBs calculated using EPA's "blended" fish method (top panel) and the sole use of largemouth bass (bottom panel) (SED 6).**

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																	
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH
					0.25	0.21	0.16	0.34	0.17	0.42	0.50	0.19	0.80	0.35	0.49	0.43	0.41	0.22	0.009	0.006	0.005	0.004
Blended Fish Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019																		
			Cancer @ 10 <sup>-5</sup>	0.019																		
			Cancer @ 10 <sup>-4</sup>	0.19																		
			Non-Cancer -- Child	0.026																		
			Non-Cancer -- Adult	0.062																		
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																		
			Cancer @ 10 <sup>-5</sup>	0.49																		
			Cancer @ 10 <sup>-4</sup>	4.9																		
			Non-Cancer -- Child	0.19																		
	Probabilistic	(5th percentile)	Non-Cancer -- Adult	0.43																		
			Cancer @ 10 <sup>-6</sup>	0.0064																		
			Cancer @ 10 <sup>-5</sup>	0.064																		
			Cancer @ 10 <sup>-4</sup>	0.64																		
			Non-Cancer -- Child	0.059																		
		(50th percentile)	Non-Cancer -- Adult	0.12																		
			Cancer @ 10 <sup>-6</sup>	0.057																		
			Cancer @ 10 <sup>-5</sup>	0.57																		
			Cancer @ 10 <sup>-4</sup>	5.7																		
	Non-Cancer -- Child	0.71																				
	Non-Cancer -- Adult	1.5																				

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																	
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH
					0.26	0.22	0.16	0.35	0.17	0.40	0.41	0.20	0.70	0.34	0.45	0.40	0.39	0.22	0.009	0.006	0.005	0.004
Bass Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019																		
			Cancer @ 10 <sup>-5</sup>	0.019																		
			Cancer @ 10 <sup>-4</sup>	0.19																		
			Non-Cancer -- Child	0.026																		
			Non-Cancer -- Adult	0.062																		
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																		
			Cancer @ 10 <sup>-5</sup>	0.49																		
			Cancer @ 10 <sup>-4</sup>	4.9																		
			Non-Cancer -- Child	0.19																		
	Probabilistic	(5th percentile)	Non-Cancer -- Adult	0.43																		
			Cancer @ 10 <sup>-6</sup>	0.0064																		
			Cancer @ 10 <sup>-5</sup>	0.064																		
			Cancer @ 10 <sup>-4</sup>	0.64																		
			Non-Cancer -- Child	0.059																		
		(50th percentile)	Non-Cancer -- Adult	0.12																		
			Cancer @ 10 <sup>-6</sup>	0.057																		
			Cancer @ 10 <sup>-5</sup>	0.57																		
			Cancer @ 10 <sup>-4</sup>	5.7																		
	Non-Cancer -- Child	0.71																				
	Non-Cancer -- Adult	1.5																				

**Notes**

<sup>1</sup> Model endpoint concentrations after 52-year projection (autumn average); whole body concentrations divided by a factor of 5.0 to convert to fillet basis. Results for CT impoundments are highly uncertain as they were estimated from the CT I-D Analysis. Results for SED 6 reflect new downstream model simulations which have been revised from those presented in the CMS Report to assume remediation of more grid cells in Reaches 7B and 7C, as discussed in Response to Specific Comment 44.

BBD: Bulls Bridge Dam Impoundment  
 LL: Lake Lillinoah  
 LZ: Lake Zoar  
 LH: Lake Housatonic

**Key**

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- = model prediction is lower than the cancer IMPG, but is not lower than the corresponding non-cancer IMPGs
- = model prediction exceeds the IMPG

CTE = central tendency exposure  
 RME = reasonable maximum exposure

**Table SC38-6. IMPGs for human consumption of fish tissue compared to projected fillet-based fish PCBs calculated using EPA's "blended" fish method (top panel) and the sole use of largemouth bass (bottom panel) (SED 7).**

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																				
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH			
Blended Fish Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019	0.27	0.23	0.18	0.36	0.19	0.44	0.25	0.19	0.85	0.33	0.49	0.36	0.42	0.19	0.009	0.006	0.005	0.004			
			Cancer @ 10 <sup>-5</sup>	0.019																					
			Cancer @ 10 <sup>-4</sup>	0.19																					
			Non-Cancer -- Child	0.026																					
		Non-Cancer -- Adult	0.062																						
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																					
			Cancer @ 10 <sup>-5</sup>	0.49																					
			Cancer @ 10 <sup>-4</sup>	4.9																					
			Non-Cancer -- Child	0.19																					
	Non-Cancer -- Adult		0.43																						
	Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064																					
			Cancer @ 10 <sup>-5</sup>	0.064																					
			Cancer @ 10 <sup>-4</sup>	0.64																					
			Non-Cancer -- Child	0.059																					
			Non-Cancer -- Adult	0.12																					
		CTE (50th percentile)	Cancer @ 10 <sup>-6</sup>	0.057																					
			Cancer @ 10 <sup>-5</sup>	0.57																					
			Cancer @ 10 <sup>-4</sup>	5.7																					
Non-Cancer -- Child			0.71																						
Non-Cancer -- Adult	1.5																								

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																				
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH			
Bass Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019	0.29	0.25	0.18	0.39	0.19	0.42	0.23	0.20	0.75	0.33	0.46	0.35	0.40	0.20	0.009	0.006	0.005	0.004			
			Cancer @ 10 <sup>-5</sup>	0.019																					
			Cancer @ 10 <sup>-4</sup>	0.19																					
			Non-Cancer -- Child	0.026																					
		Non-Cancer -- Adult	0.062																						
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																					
			Cancer @ 10 <sup>-5</sup>	0.49																					
			Cancer @ 10 <sup>-4</sup>	4.9																					
			Non-Cancer -- Child	0.19																					
	Non-Cancer -- Adult		0.43																						
	Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064																					
			Cancer @ 10 <sup>-5</sup>	0.064																					
			Cancer @ 10 <sup>-4</sup>	0.64																					
			Non-Cancer -- Child	0.059																					
			Non-Cancer -- Adult	0.12																					
		CTE (50th percentile)	Cancer @ 10 <sup>-6</sup>	0.057																					
			Cancer @ 10 <sup>-5</sup>	0.57																					
			Cancer @ 10 <sup>-4</sup>	5.7																					
Non-Cancer -- Child			0.71																						
Non-Cancer -- Adult	1.5																								

**Notes**

<sup>1</sup> Model endpoint concentrations after 52-year projection (autumn average); whole body concentrations divided by a factor of 5.0 to convert to fillet basis. Results for CT impoundments are highly uncertain as they were estimated from the CT I-D Analysis. Results for SED 7 reflect new downstream model simulations which have been revised from those presented in the CMS Report to assume remediation of more grid cells in Reaches 7B and 7C, as discussed in Response to Specific Comment 44.

BBD: Bulls Bridge Dam Impoundment  
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**Table SC38-7. IMPGs for human consumption of fish tissue compared to projected fillet-based fish PCBs calculated using EPA's "blended" fish method (top panel) and the sole use of largemouth bass (bottom panel) (SED 8).**

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																	
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH
					0.16	0.14	0.11	0.26	0.12	0.37	1.0	1.1	0.76	0.19	0.44	0.16	0.38	0.18	0.006	0.005	0.004	0.003
Blended Fish Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019																		
			Cancer @ 10 <sup>-5</sup>	0.019																		
			Cancer @ 10 <sup>-4</sup>	0.19																		
		Non-Cancer -- Child	0.026																			
		Non-Cancer -- Adult	0.062																			
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																		
	Cancer @ 10 <sup>-5</sup>	0.49																				
	Cancer @ 10 <sup>-4</sup>	4.9																				
	Non-Cancer -- Child	0.19																				
	Non-Cancer -- Adult	0.43																				
	Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064																		
			Cancer @ 10 <sup>-5</sup>	0.064																		
			Cancer @ 10 <sup>-4</sup>	0.64																		
		Non-Cancer -- Child	0.059																			
		Non-Cancer -- Adult	0.12																			
		CTE (50th percentile)	Cancer @ 10 <sup>-6</sup>	0.057																		
	Cancer @ 10 <sup>-5</sup>	0.57																				
	Cancer @ 10 <sup>-4</sup>	5.7																				
Non-Cancer -- Child	0.71																					
Non-Cancer -- Adult	1.5																					

Tissue Type	Assessment Type	Exposure Assumptions	Risk Level	IMPG (mg/kg)	Average Fish Tissue (Fillet) PCB Concentration (mg/kg) <sup>1</sup>																	
					Reach 5A	Reach 5B	Reach 5C	Reach 5D	Reach 6	Reach 7A	Reach 7B	Reach 7C	Reach 7D	Reach 7E	Reach 7F	Reach 7G	Reach 7H	Reach 8	BBD	LL	LZ	LH
					0.17	0.15	0.11	0.29	0.13	0.34	0.10	0.12	0.63	0.18	0.38	0.15	0.35	0.17	0.006	0.005	0.004	0.003
Bass Fillets	Deterministic	RME	Cancer @ 10 <sup>-6</sup>	0.0019																		
			Cancer @ 10 <sup>-5</sup>	0.019																		
			Cancer @ 10 <sup>-4</sup>	0.19																		
		Non-Cancer -- Child	0.026																			
		Non-Cancer -- Adult	0.062																			
		CTE	Cancer @ 10 <sup>-6</sup>	0.049																		
	Cancer @ 10 <sup>-5</sup>	0.49																				
	Cancer @ 10 <sup>-4</sup>	4.9																				
	Non-Cancer -- Child	0.19																				
	Non-Cancer -- Adult	0.43																				
	Probabilistic	RME (5th percentile)	Cancer @ 10 <sup>-6</sup>	0.0064																		
			Cancer @ 10 <sup>-5</sup>	0.064																		
			Cancer @ 10 <sup>-4</sup>	0.64																		
		Non-Cancer -- Child	0.059																			
		Non-Cancer -- Adult	0.12																			
		CTE (50th percentile)	Cancer @ 10 <sup>-6</sup>	0.057																		
	Cancer @ 10 <sup>-5</sup>	0.57																				
	Cancer @ 10 <sup>-4</sup>	5.7																				
Non-Cancer -- Child	0.71																					
Non-Cancer -- Adult	1.5																					

**Notes**

<sup>1</sup> Model endpoint concentrations after 52-year projection (autumn average); whole body concentrations divided by a factor of 5.0 to convert to fillet basis. Results for CT impoundments are highly uncertain as they were estimated from the CT 1-D Analysis. Results for SED 8 reflect new downstream model simulations which have been revised from those presented in the CMS Report to assume remediation of more grid cells in Reaches 7B and 7C, as discussed in Response to Specific Comment 44.

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**Table SC83-1 - Estimated Volumes, Truck Trips, and Vehicle Miles Traveled for Sediment Remedial Alternatives Material Importation**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

	<b>SED 3</b>	<b>SED 4</b>	<b>SED 5</b>	<b>SED 6</b>	<b>SED 7</b>	<b>SED 8</b>
Volume of Material in <sup>1</sup>	226,798	462,774	618,894	708,791	919,165	2,233,391
with 20% Bulking	272,158	555,328	742,672	850,549	1,102,998	2,680,070
Number of Truck Trips <sup>2</sup>	22,700	46,300	61,900	70,900	92,000	223,400
Average Truck Trips Per Year <sup>3</sup>	2,400	3,200	3,400	3,500	3,700	4,400
Number of Vehicle Miles Traveled <sup>4</sup>	1,135,000	2,315,000	3,095,000	3,545,000	4,600,000	11,170,000
Average Vehicle Miles Traveled Per Year <sup>3</sup>	118,000	159,000	170,000	175,000	183,000	220,000

**Notes:**

1. Volume (cubic yards [cy]) of material "in" includes sand, stone and riprap used for backfill, capping, and stabilization.
2. Assumes 16-ton trucks with a capacity of 12-cy.
3. Based on total construction schedule for each Alternative.
4. Assumes a 50 mile round trip.

**Table SC83-2 - Estimated Volumes, Truck Trips, and Vehicle Miles Traveled for  
Floodplain Soil Remedial Alternatives Material Importation**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

	FP 2	FP 3	FP 4	FP 5	FP 6	FP 7
Volume of Material in <sup>1</sup>	36,285	94,899	133,757	132,485	376,972	670,434
with 20% Bulking	43,542	113,879	160,508	158,982	452,366	804,521
Number of Truck Trips <sup>2</sup>	3,700	9,500	13,400	13,300	37,700	67,100
Average Truck Trips Per Year <sup>3</sup>	3,700	3,800	3,400	3,300	2,900	3,000
Number of Vehicle Miles Traveled <sup>4</sup>	185,000	475,000	670,000	665,000	1,885,000	3,355,000
Average Vehicle Miles Traveled Per Year <sup>3</sup>	185,000	191,000	170,000	166,000	147,000	152,000

**Notes:**

1. Volume (cubic yards [cy]) of material "in" includes common fill and topsoil used for backfill.
2. Assumes 16-ton trucks with a capacity of 12-cy.
3. Based on total construction schedule for each Alternative.
4. Assumes a 50 mile round trip.



**Table SC83-3 - Estimated Export Volumes for Treatment/Disposition Alternatives**

Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA

Waste Classification	Parameter	TD 1		TD 2	TD 3	TD 4		TD 5A (with reuse) <sup>1</sup>		TD 5B (without reuse)	
		Minimum (SED 3 and FP 2)	Maximum (SED 8 and FP 7)			Minimum (SED 3 and FP 2)	Maximum (SED 8 and FP 7)	Minimum (SED 3 and FP 2)	Maximum (SED 8 and FP 7)	Minimum (SED 3 and FP 2)	Maximum (SED 8 and FP 7)
TSCA	In-Situ Volume (cy)	42,900	643,000	--	--	--	--	--	--	--	--
	Transport (tons) <sup>2</sup>	64,400	964,500	--	--	--	--	--	--	--	--
	Number of Truck Trips <sup>3,4</sup>	3,300	48,300	--	--	--	--	--	--	--	--
	Average Truck Trips Per Year <sup>6</sup>	340	950	--	--	--	--	--	--	--	--
	Number of Vehicle Miles Traveled <sup>7</sup>	2,376,000	34,776,000	--	--	--	--	--	--	--	--
	Average Vehicle Miles Traveled Per Year <sup>6</sup>	248,000	686,000	--	--	--	--	--	--	--	--
Non-TSCA	In-Situ Volume (cy)	143,500	2,179,300	--	--	186,400	2,822,300	153,900	2,112,300	167,800	2,540,100
	Transport (tons) <sup>2</sup>	215,200	3,268,900	--	--	279,600	4,233,400	230,900	3,168,400	251,700	3,810,100
	Number of Truck Trips <sup>3,4</sup>	10,800	163,500	--	--	14,100	211,800	11,600	158,500	12,600	190,600
	Average Truck Trips Per Year <sup>6</sup>	1,100	3,200	--	--	1,500	4,200	1,200	3,100	1,300	3,800
	Number of Vehicle Miles Traveled <sup>7</sup>	5,940,000	89,925,000	--	--	7,755,000	116,490,000	6,380,000	87,175,000	6,930,000	104,830,000
	Average Vehicle Miles Traveled Per Year <sup>6</sup>	619,000	1,774,000	--	--	808,000	2,298,000	665,000	1,719,000	722,000	2,068,000

**Notes:**

1. TD 5A volumes assume a 10% loss of material mass following treatment.
2. Transport weight includes a 20% bulking factor and an assumed density of 1.25 tons/cy.
3. Only the transport of non-TSCA materials was considered for alternatives TD 4 and TD 5. Treatment residuals, a limited volume component, were not included.
4. Assumes a 20-ton capacity truck will be used.
5. Assumes a 720 mile round trip for all trucks carrying TSCA materials.
6. Based on total construction schedule for the SED alternative associated with each TD alternative.
7. Assumes a 550 mile round trip for all trucks carrying non-TSCA materials.

**Table SC83-4 - Estimated Import Volumes for Treatment/Disposition Alternatives**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

Parameter	TD 1	TD 2		TD 3		TD 4	TD 5
		Minimum (SED 6)	Maximum (SED 8)	Minimum (SED 3 and FP 2)	Maximum (SED 8 and FP 7)		
In-Place Volume (cy) <sup>1</sup>	--	111,136	228,149	13,500	131,700	--	--
with 20% Bulking	--	133,364	273,778	16,200	158,040	--	--
Number of Truck Trips <sup>2</sup>	--	11,200	22,900	1,400	13,200	--	--
Average Truck Trips Per Year <sup>3</sup>	--	550	450	150	260	--	--
Number of Vehicle Miles Traveled <sup>4</sup>	--	560,000	1,145,000	70,000	660,000	--	--
Average Vehicle Miles Traveled Per Year <sup>3</sup>	--	28,000	23,000	7,000	13,000	--	--

**Notes:**

1. In-place volume includes sand and stone for staging/decontamination area setup; sand, stone, common fill and topsoil used for backfill/capping; and riprap for stabilization.
2. Assumes 16-ton trucks with a capacity of 12-cy.
3. Based on total construction schedule for each Alternative.
4. Assumes a 50 mile round trip.

**Table SC83-5 - Estimated Worker Fatalities and Non-Fatal Injuries for Sediment, Floodplain Soil, and Treatment/Disposition Remedial Alternatives**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

Remedial Alternative	Fatality Estimate <sup>1</sup>	Average Annual Fatality Estimate <sup>2</sup>	Probability of at Least One Fatality <sup>3</sup>	Non-Fatal Injury Estimate	Average Annual Non-Fatal Injury Estimate <sup>2</sup>	Probability of at Least One Non-Fatal Injury <sup>3</sup>
SED 3	0.03	0.003	0.03	3.68	0.38	0.97
SED 4	0.05	0.003	0.05	6.30	0.43	1.00
SED 5	0.07	0.004	0.07	7.51	0.41	1.00
SED 6	0.08	0.004	0.08	7.48	0.37	1.00
SED 7	0.12	0.005	0.11	9.57	0.38	1.00
SED 8	0.26	0.005	0.23	16.23	0.32	1.00
FP 2	0.002	0.002	0.002	0.28	0.28	0.25
FP 3	0.008	0.003	0.008	1.08	0.43	0.66
FP 4	0.01	0.003	0.01	1.55	0.39	0.79
FP 5	0.01	0.003	0.01	1.57	0.39	0.79
FP 6	0.03	0.002	0.03	4.65	0.36	0.99
FP 7	0.06	0.003	0.06	7.86	0.36	1.00
TD 2	Minimum	0.01	0.0005	1.08	0.05	0.66
	Maximum	0.03	0.001	3.26	0.06	0.96
TD 3	Minimum	0.05	0.005	8.26	0.86	1.00
	Maximum	0.15	0.003	22.34	0.44	1.00
TD 4	Minimum	0.008	0.0008	1.48	0.15	0.77
	Maximum	0.08	0.002	14.51	0.29	1.00
TD 5	Minimum	0.008	0.0008	1.48	0.15	0.77
	Maximum	0.09	0.002	16.17	0.32	1.00

**Notes:**

1. Sum of the estimated number of fatal or non-fatal injuries in each labor category.
2. Based on total construction schedule for each Alternative.
3. Assuming a Poisson probability distribution.

**Table SC83-6 - Estimated Fatalities and Non-fatal Injuries Related to Truck Transportation of Imported Materials for Sediment and Floodplain Soil Remedial Alternatives and Imported and Excavated Materials for Various Combinations of Treatment/Disposition and Sediment and Floodplain Soil Remedial Alternatives**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

Remedial Alternative	Fatality Estimate <sup>1</sup>	Average Annual Fatality Estimate <sup>2</sup>	Probability of at Least One Fatality	Injury Estimate <sup>3</sup>	Average Annual Injury Estimate <sup>4</sup>	Probability of at Least One Injury
SED 3	0.03	0.003	0.03	0.65	0.07	0.48
SED 4	0.06	0.004	0.05	1.32	0.09	0.73
SED 5	0.07	0.004	0.07	1.76	0.10	0.83
SED 6	0.09	0.004	0.08	2.02	0.10	0.87
SED 7	0.11	0.004	0.10	2.62	0.10	0.93
SED 8	0.27	0.005	0.24	6.37	0.13	1.00
FP 2	0.004	0.004	0.004	0.11	0.11	0.10
FP 3	0.01	0.004	0.01	0.27	0.11	0.24
FP 4	0.02	0.005	0.02	0.38	0.10	0.32
FP 5	0.02	0.005	0.02	0.38	0.10	0.32
FP 6	0.05	0.004	0.04	1.07	0.08	0.66
FP 7	0.08	0.004	0.08	1.91	0.09	0.85
TD 1 (SED 3 and FP 2 to SED 8 and FP 7)	Minimum	0.20	0.02	4.74	0.49	0.99
	Maximum	2.99	0.06	71.08	1.40	1.00
TD 2 (SED 6 and SED 8)	Minimum	0.01	0.0005	0.32	0.02	0.27
	Maximum	0.03	0.0006	0.65	0.01	0.48
TD 3 (SED 3 and FP 2 to SED 8 and FP 7)	Minimum	0.002	0.0002	0.04	0.004	0.04
	Maximum	0.02	0.0004	0.38	0.01	0.31
TD 4 (SED 3 and FP 2 to SED 8 and FP 7)	Minimum	0.19	0.02	4.42	0.46	0.99
	Maximum	2.80	0.06	66.40	1.31	1.00
TD 5A (SED 3 and FP 2 to SED 8 and FP 7)	Minimum	0.15	0.02	3.64	0.38	0.97
	Maximum	2.09	0.04	49.69	0.98	1.00
TD 5B (SED 3 and FP 2 to SED 8 and FP 7)	Minimum	0.17	0.02	3.95	0.41	0.98
	Maximum	2.52	0.05	59.75	1.18	1.00

**Notes:**

1. Assumes a fatality rate of  $2.4 \times 10^{-8}$  fatalities per vehicle mile traveled.
2. Based on total construction schedule for each Alternative.
3. Assumes a non-fatal injury rate of  $5.7 \times 10^{-7}$  injuries per vehicle mile traveled.
4. Based on total construction schedule for each Alternative.

**Table SC123-1 - TD Cost Modification Summary for SED 6**

Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA

SED 6							
Item #	Description	Individual Costs	TD1 Modifications	TD2 Modifications	TD3 Modifications	TD4 Modifications	TD5 Modifications
1.0	Pre-Design Investigation	\$9,268,954	\$0	-\$993,841	\$0	-\$1,183,870	\$0
2.0	Mobilization/Demobilization	\$9,268,954	\$0	-\$993,841	\$0	-\$1,183,870	\$0
3.0	Construction of Staging Areas/Access Roads	\$12,413,242	\$0	\$0	\$0	\$0	\$0
4.0	Sheeting	\$30,625,443	\$0	\$0	\$0	\$0	\$0
5.0	Dewatering	\$17,611,914	\$0	-\$10,400,000	\$0	-\$10,408,278	\$0
6.0	Water Treatment	\$20,103,973	\$0	\$0	\$0	-\$13,269,126	\$0
7.0	Debris Removal	\$1,011,500	\$0	\$0	\$0	\$0	\$0
8.0	Excavation	\$40,638,667	\$0	-\$7,116,794	\$0	\$0	\$0
9.0	Backfill Material Placement	\$35,353,665	\$0	-\$2,360,017	\$0	\$0	\$0
10.0	Bank Stabilization	\$10,061,098	\$0	\$0	\$0	\$0	\$0
11.0	Site Restoration	\$5,454,122	\$0	\$0	\$0	\$0	\$0
12.0	Transportation and Disposal (Staging/Access)	\$16,211,417	\$0	\$0	-\$16,211,417	\$0	\$0
13.0	Surveys	\$3,569,748	\$0	\$0	\$0	\$0	\$0
14.0	Environmental Monitoring	\$8,535,701	\$0	\$0	\$0	\$0	\$0
	<b>Subtotal</b>	\$220,128,398	\$0	-\$21,864,493	-\$16,211,417	-\$26,045,144	\$0
	Project/Construction Management (5%)	\$11,006,349	\$0	-\$1,093,793	-\$810,571	-\$1,302,104	\$0
	Engineering and Administration (5%)	\$11,006,349	\$0	-\$1,093,793	-\$810,571	-\$1,302,104	\$0
	Contingency (25%)	\$55,031,744	\$0	-\$5,468,966	-\$4,052,853	-\$6,510,528	\$0
	<b>SUBTOTAL</b>	\$297,172,840	\$0	-\$29,521,044	-\$21,885,412	-\$35,159,878	\$0
15.0	Annual O & M/Long Term Monitoring Program	\$1,341,340	\$0	\$0	\$0	\$0	\$0
	<b>TOTAL OMM</b>	\$14,573,780	\$0	\$0	\$0	\$0	\$0
TD							
Item #	Description	Individual Costs	TD1 Costs	TD2 Costs	TD3 Costs	TD4 Costs	TD5 Costs
1.0	Off-site Transportation and Disposal - Non-TSCA		\$61,072,875	\$30,386,250	\$0	\$82,370,795	\$82,370,795
2.0	Off-site Transportation and Disposal - TSCA		\$64,977,000	\$22,909,190	\$0	\$0	\$0
3.0	TD Capital Costs		\$0	\$5,560,000	\$21,900,000	\$13,946,765	\$14,413,619
	<b>Subtotal</b>		\$126,049,875	\$58,855,440	\$21,900,000	\$96,317,560	\$96,784,414
	Project/Construction Management (5%)		\$6,302,494	\$2,942,772	\$1,095,000	\$4,815,878	\$4,839,221
	Engineering and Administration (5%)		\$6,302,494	\$2,942,772	\$1,095,000	\$4,815,878	\$4,839,221
	Contingency (25%)		\$31,512,469	\$14,713,860	\$5,475,000	\$24,079,390	\$24,196,103
	<b>SUBTOTAL</b>		\$170,167,331	\$79,454,844	\$29,565,000	\$130,028,706	\$130,658,959
4.0	TD Daily Operations		\$0	\$7,428,480	\$10,569,345	\$92,519,445	\$60,451,827
5.0	TD Post-Closure O&M		\$0	\$6,072,000	\$12,030,000	\$0	\$0
	<b>TOTAL OMM</b>		\$0	\$13,500,480	\$22,599,345	\$92,519,445	\$60,451,827
	<b>TOTAL COST OF COMBINED ALTERNATIVE (rounded)</b>		\$482,000,000	\$396,000,000	\$334,000,000	\$499,000,000	\$502,000,000

**Table SC123-2 - TD Cost Modification Summary for FP 4**

Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
 General Electric Company - Pittsfield, MA

FP 4							
Item #	Description	Individual Costs	TD1 Modifications	TD3 Modifications	TD4 Modifications	TD5A Modifications	TD5B Modifications
1.0	Pre-Design Investigation	\$2,159,511	\$0	\$0	\$0	-\$55,528	\$0
2.0	Mobilization/Demobilization	\$1,079,756	\$0	\$0	\$0	-\$27,764	\$0
3.0	Construction of Staging Areas/Access Roads	\$3,527,970	\$0	\$0	\$0	\$0	\$0
4.0	Dewatering	\$156,000	\$0	\$0	\$0	\$0	\$0
5.0	Water Treatment	\$576,147	\$0	\$0	\$0	\$0	\$0
6.0	Excavation	\$6,001,837	\$0	\$0	\$0	\$0	\$0
7.0	Backfill Material Placement	\$4,189,565	\$0	\$0	\$0	-\$555,277	\$0
8.0	Site Restoration	\$5,109,804	\$0	\$0	\$0	\$0	\$0
9.0	Transportation and Disposal (Staging/Access)	\$4,178,128	\$0	-\$4,178,128	\$0	\$0	\$0
10.0	Topographic Surveys	\$1,009,457	\$0	\$0	\$0	\$0	\$0
11.0	Environmental Monitoring	\$1,024,331	\$0	\$0	\$0	\$0	\$0
	<b>Subtotal</b>	\$29,012,506	\$0	-\$4,178,128	\$0	-\$638,569	\$0
	Project/Construction Management (5%)	\$1,450,625	\$0	-\$208,906	\$0	-\$31,928	\$0
	Engineering and Administration (5%)	\$1,450,625	\$0	-\$208,906	\$0	-\$31,928	\$0
	Contingency (25%)	\$7,253,126	\$0	-\$1,044,532	\$0	-\$159,642	\$0
	<b>SUBTOTAL</b>	\$39,166,883	\$0	-\$5,640,473	\$0	-\$862,068	\$0
12.0	Annual O & M	\$240,000	\$0	\$0	\$0	\$0	\$0
	<b>TOTAL O &amp; M</b>	\$720,000	\$0	\$0	\$0	\$0	\$0
TD							
Item #	Description	Individual Costs	TD1 Costs	TD3 Costs	TD4 Costs	TD5A Costs	TD5B Costs
1.0	Off-site Transportation and Disposal - Non-TSCA		\$8,070,176	\$0	\$14,850,000	\$5,940,000	\$13,365,000
2.0	Off-site Transportation and Disposal - TSCA		\$14,915,613	\$0	\$0	\$0	\$0
3.0	TD Capital Costs		\$0	\$4,632,279	\$11,952,500	\$3,076,728	\$3,076,728
	<b>Subtotal</b>		\$22,985,789	\$4,632,279	\$26,802,500	\$9,016,728	\$16,441,728
	Project/Construction Management (5%)		\$1,149,289	\$231,614	\$1,340,125	\$450,836	\$822,086
	Engineering and Administration (5%)		\$1,149,289	\$231,614	\$1,340,125	\$450,836	\$822,086
	Contingency (25%)		\$5,746,447	\$1,158,070	\$6,700,625	\$2,254,182	\$4,110,432
	<b>SUBTOTAL</b>		\$31,030,815	\$6,253,576	\$36,183,375	\$12,172,583	\$22,196,333
4.0	TD Daily Operations		\$0	\$1,750,456	\$16,089,568	\$12,736,348	\$12,736,348
5.0	TD Post-Closure O&M		\$0	\$6,330,000	\$0	\$0	\$0
	<b>TOTAL OMM</b>		\$0	\$8,080,456	\$16,089,568	\$12,736,348	\$12,736,348
	<b>TOTAL COST OF ALTERNATIVE (Rounded)</b>		\$71,000,000	\$49,000,000	\$92,000,000	\$64,000,000	\$75,000,000

**Table SC124-1 - Summary of Cost Estimates for SED/TD Combinations**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

Alternative	Cost Estimates for SED/FP Combinations <sup>1,2</sup>				
	TD 1 Off-Site Disposal	TD 2 Confined Disposal Facility	TD 3 Upland Disposal Facility	TD 4 Chemical Extraction	TD 5 Thermal Desorption
<b>SED 1<sup>3</sup></b>	NA	NA	NA	NA	NA
<b>SED 2<sup>4</sup></b>	\$5 M	NA	\$5 M	\$5 M	\$5 M
<b>SED 3</b>	\$194 M	NA	\$163 M	\$238 M	\$240 M
<b>SED 4</b>	\$311 M	NA	\$248 M	\$367 M	\$382 M
<b>SED 5</b>	\$386 M	NA	\$302 M	\$453 M	\$489 M
<b>SED 6</b>	\$495 M	\$194 M	\$365 M	\$518 M	\$621 M
<b>SED 7</b>	\$642 M	\$311 M	\$440 M	\$662 M	\$813 M
<b>SED 8</b>	\$1,298 M	\$386 M	\$787 M	\$1,467 M	\$1,873 M

Notes:

1. Costs presented represent the sum of estimated capital/labor costs of implementation and the costs of post-remediation OMM and/or long-term monitoring.
2. Costs are presented in 2008 dollars. \$ M = million dollars.
3. There are no costs associated with SED 1 as that alternative would not involve remedial activities in the Rest of River.
4. There are no treatment/disposition costs for SED 2; the cost listed represents the long-term monitoring costs associated with monitored natural recovery.

**Table SC124-2 - Summary of Present Worth Cost Estimates for SED/TD Combinations**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

Alternative	Present Worth Cost Estimates for SED/TD Combinations <sup>1,2,3</sup>				
	TD 1 Off-Site Disposal	TD 2 Confined Disposal Facility	TD 3 Upland Disposal Facility	TD 4 Chemical Extraction	TD 5 Thermal Desorption
<b>SED 1<sup>4</sup></b>	NA	NA	NA	NA	NA
<b>SED 2<sup>5</sup></b>	\$2 M	NA	\$2 M	\$2 M	\$2 M
<b>SED 3</b>	\$143 M	NA	\$110 M	\$178 M	\$179 M
<b>SED 4</b>	\$197 M	NA	\$149 M	\$239 M	\$251 M
<b>SED 5</b>	\$221 M	NA	\$165 M	\$268 M	\$296 M
<b>SED 6</b>	\$266 M	\$143 M	\$187 M	\$296 M	\$361 M
<b>SED 7</b>	\$303 M	\$197 M	\$198 M	\$321 M	\$428 M
<b>SED 8</b>	\$383 M	\$221 M	\$210 M	\$442 M	\$728 M

Notes:

1. Costs presented represent the sum of estimated capital/labor costs of implementation and the costs of post-remediation OMM and/or long-term monitoring.
2. Costs are presented in 2008 dollars. \$ M = million dollars.
3. Costs have been assessed for present worth, assuming a constant 7% discount factor.
4. There are no costs associated with SED 1 as that alternative would not involve remedial activities in the Rest of River.
5. There are no treatment/disposition costs for SED 2; the cost listed represents the long-term monitoring costs associated with monitored natural recovery.



**Table SC124-3 - Summary of Cost Estimates for FP/TD Combinations**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

Alternative	Cost Estimates for FP/TD Combinations <sup>1,2</sup>					
	TD 1 Off-Site Disposal	TD 2 <sup>4</sup> Confined Disposal Facility	TD 3 Upland Disposal Facility	TD 4 Chemical Extraction	TD 5A Thermal Desorption (w/ Reuse)	TD 5B Thermal Desorption (w/o Reuse)
FP 1 <sup>3</sup>	NA	NA	NA	NA	NA	NA
FP 2	\$17 M	NA	\$25 M	\$36 M	\$23 M	\$26 M
FP 3	\$50 M	NA	\$48 M	\$74 M	\$63 M	\$70 M
FP 4	\$88 M	NA	\$66 M	\$106 M	\$96 M	\$107 M
FP 5	\$87 M	NA	\$58 M	\$93 M	\$82 M	\$92 M
FP 6	\$209 M	NA	\$142 M	\$250 M	\$232 M	\$264 M
FP 7	\$369 M	NA	\$244 M	\$458 M	\$440 M	\$498 M

Notes:

1. Costs presented represent the sum of estimated capital/labor costs of implementation and the costs of post-remediation OMM and/or long-term monitoring.
2. Costs are presented in 2008 dollars. \$ M = million dollars.
3. There are no costs associated with FP 1 as that alternative would not involve remedial activities in the Rest of River.
4. Floodplain alternatives have not been combined with TD 2 as the CDF has been assumed to be available only for the placement of hydraulically dredged sediments.

**Table SC124-4 - Summary of Present Worth Costs Estimate for FP/TD Combinations**

**Response to EPA's Interim Comments on CMS Report, Housatonic River - Rest of River  
General Electric Company - Pittsfield, MA**

Alternative	Present Worth Cost Estimates for FP/TD Combinations <sup>1,2,3</sup>					
	TD 1 Off-Site Disposal	TD 2 <sup>5</sup> Confined Disposal Facility	TD 3 Upland Disposal Facility	TD 4 Chemical Extraction	TD 5A Thermal Desorption (w/ Reuse)	TD 5B Thermal Desorption (w/o Reuse)
FP 1 <sup>4</sup>	NA	NA	NA	NA	NA	NA
FP 2	\$16 M	NA	\$17 M	\$35 M	\$23 M	\$25 M
FP 3	\$49 M	NA	\$37 M	\$67 M	\$57 M	\$63 M
FP 4	\$73 M	NA	\$51 M	\$93 M	\$85 M	\$93 M
FP 5	\$77 M	NA	\$45 M	\$84 M	\$74 M	\$82 M
FP 6	\$135 M	NA	\$88 M	\$170 M	\$162 M	\$182 M
FP 7	\$172 M	NA	\$111 M	\$229 M	\$237 M	\$263 M

Notes:

1. Costs presented represent the sum of estimated capital/labor costs of implementation and the costs of post-remediation OMM and/or long-term monitoring.
2. Costs are presented in 2008 dollars. \$ M = million dollars.
3. Costs have been assessed for present worth assuming a constant 7% discount factor.
4. There are no costs associated with FP 1 as that alternative would not involve remedial activities in the Rest of River.
5. Floodplain alternatives have not been combined with TD 2 as the CDF has been assumed to be available only for the placement of hydraulically dredged sediments.