



Timothy A. Kruppenbacher, P.E.
Operations Manager

GE
Hudson River Project Office
381 Broadway, Bldg. 40-2
Fort Edward, NY 12828

T 518 746 5247
F 518 746 5701
Timothy.Kruppenbacher@ge.com

June 18, 2013

Mr. David King, P.E.
Director, Hudson River Field Office
U.S. Environmental Protection Agency, Region 2
421 Lower Main Street
Hudson Falls, New York 12839
(Two paper copies (one unbound) and one electronic copy)

**Re: Hudson River PCBs Superfund Site
Remedial Action Consent Decree (Civil Action No.1:05 CV-1270)
Addendum No. 1 to Phase 2 Remedial Action Work Plan for 2013**

Dear Mr. King:

On April 17, 2013, GE submitted to EPA a revised version of GE's Remedial Action Work Plan for Phase 2 Dredging and Facility Operations in 2013 (2013 RAWP) and its appendices. By letter dated April 26, 2013, EPA approved the revised 2013 RAWP and appendices with the understanding that a number of specified items would be addressed. GE subsequently met with EPA on May 15, 2013, to discuss those items. Based on that discussion, EPA and GE agreed that certain portions of the 2013 RAWP and the Performance Standards Compliance Plan for 2013 (2013 PSCP) would be revised. In addition, after additional discussions with EPA, GE has made some further revisions to the main 2013 RAWP and the 2013 PSCP, as well as a table in the Phase 2 Dredging Construction Quality Control/Quality Assurance Plan for 2013 (2013 DQAP) and Section 2 of the Phase 2 Facility Operations and Maintenance Plan (2013 Facility O&M Plan).

To incorporate these revisions, GE is herewith submitting the following:

- A revised version of the text of the main body of 2013 RAWP, showing the following substantive revisions:
 - Revised Figures 2-5A, 2-5B, and 2-5C and a new a new Figure 2-5D to reflect revised anchoring locations proposed by the Dredging Contractor;
 - Revised Table 2-3 to include an additional backfill and cap material source (BJ Farms);
 - Revisions to Section 2.10.4 (Placement Methods) and Section 3.4.4 (SAV Monitoring, Re-planting and Acceptance) to address EPA comments;
 - Revisions to Section 3.4.3 (SAV Planting Procedures) to reflect changes to the planting sequence and plant delivery location;
 - Revisions to Table 2-1 (2013 Dredge Areas) and Table 4-1 (*In situ* Volume of Sediment Targeted for Removal (cy)) to include CU77 in the 2013 dredge areas; and
 - Revised Attachment 1 (Material Source Truck Routes) to add truck route from BJ Farms.

- A revised version of the 2013 PSCP, showing the following substantive revisions;
 - Revision to the last paragraph of Section 3.1.1 to reflect discussions with EPA;
 - Revisions to Section 6.2.1 to better describe routine best management practices (BMPs) being used to help control PCB emissions to the ambient air; and
 - The addition of a footnote in Section 6.3 regarding air monitoring;
- New Table A2-3 for Habitat Construction as an attachment to the 2013 DQAP; and
- A revised version of Section 2 of the text of the 2013 Facility O&M Plan showing changes to Sections 2.2.1, 2.3.1, and 2.3.2 to clarify off-loading practices as discussed with EPA.

We also note, with regard to Comment #4 in EPA's April 26, 2013 letter, that not all habitat construction areas that were constructed in 2012 will be planted in 2013, but only those listed in Section 3 of the 2013 RAWP (i.e., CUs 10 and 20 through 26). GE and EPA have agreed that the Optional Supplemental Planting Areas in these CUs will be planted, as necessary, in conjunction with the adjacent main planting areas.

Please contact me if you have any questions.

Sincerely,



Timothy A. Kruppacher
Operations Manager

Enclosures

cc:

Douglas Garbarini, Chief
Special Projects Branch
Emergency and Remedial Response Division
United States Environmental Protection Agency, Region 2
290 Broadway, 18th Floor
New York, New York 10007-1866
(One paper copy and one electronic copy)

Chief, New York/Caribbean Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, New York 10007-1866
Attn: Hudson River PCBs Superfund Site Attorney
(One electronic copy)

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
Re: DJ #90-11-2-529
(Cover letter only)

Director, Division of Environmental Remediation
New York State Department of Environmental Conservation
625 Broadway, 12th Floor
Albany, New York 12233-7011
Attn: Hudson River PCBs Superfund Site
(One paper copy and one electronic copy)

Alyce Fritz, Chief
NE/Mid-Atlantic Branch
NOAA
NOS OR&R Assessment and Restoration Division
7600 Sand Point Way, NE
Building 4 (N/ORR2)
Seattle, WA 98115
(One paper copy and one electronic copy)

Lisa Rosman
Coastal Resource Coordinator
NOAA
290 Broadway, 18th Floor
New York, NY 10007-1866
(One paper copy and one electronic copy)

Director, Bureau of Environmental Exposure Investigation
New York State Department of Health
Empire State Plaza, Corning Tower, Room 1787
Albany, NY 12238
Attn: Hudson River PCBs Superfund Site
(One paper copy and one electronic copy)

Kathryn Jahn
DOI Manager
Hudson River NRDA Case
U.S. Department of the Interior
300 Westgate Center Drive
Hadley, MA 01035
(One paper copy and one electronic copy)

bcc: J. Haggard, GE
D. DeLisle, GE
B. Gibson, GE
A. Inglis, GE
E. Merrifield, GE
J. Bieke, Sidley Austin
S. Lamb, Parsons