

# United States Senate

March 19, 2024

Lawrence Culp, Jr.  
Chairman and Chief Executive Officer  
General Electric  
One Financial Center, Suite 3700  
Boston, MA 02110

Dear Mr. Culp,

We write to urge General Electric (GE) to revisit and revise its proposed “On-Site and Off-Site Transportation and Disposal Plan” for the Housatonic Rest of River clean-up, in order to more properly assess the project-wide benefits of using rail and hydraulics systems to transport sediment, soil, and debris. As filed with U.S. Environmental Protection Agency (EPA), the proposal is predisposed to conclude that on-site disposal options will rely heavily on truck transportation, and it fails to provide a roadmap for how GE will handle material disposal further downstream. This important remediation project demands further consideration of rail as a transport option for waste material.

According to GE’s proposal, trucks will likely move material to the upland disposal facility for nearly all reaches of the river and all types of materials, except for certain sediment from downstream areas that hydraulic pipe can easily move.<sup>1</sup> With a truck-centric focus, the proposal fails to sufficiently consider the efficiency, environmental, public health, and climate benefits of rail transportation. It also ignores both local concerns and recent statements from the state-owned Housatonic Railroad rail line, which expressed interest in working with GE to ensure that the rail infrastructure is able to transport waste material.<sup>2</sup>

Additionally, the proposal does not include an evaluation of transport systems for sites that are further downstream, despite some well-located rail siting options. As a result, we ask that GE resubmit a transportation plan that includes a full assessment of rail systems for use throughout the disposal process, including on the furthest downstream reaches of the Rest of River clean-up. Although it may be some time before clean-up begins on the downstream reaches, GE must assess and make clear how it intends to proceed with material transport throughout the process.

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<sup>1</sup> Matthew Calacone, *General Electric Company On-Site and Off-Site Transportation and Disposal Plan* at 17-18, Arcadis U.S., Inc. (Oct. 31, 2023), <https://semspub.epa.gov/work/01/677632.pdf>.

<sup>2</sup> Clarence Fanto, *Trains gaining on trucks? Push for rail making headway in Rest of River PCB transport discussion*, *Berkshire Eagle* (Dec. 12, 2023), [https://www.berkshireeagle.com/news/local/epa-promises-close-scrutiny-of-the-ge-draft-plan-for-transport-of-pcb-waste-during-the-rest-of-river-project/article\\_11be8e0c-9461-11ee-ba04-3b58298e9176.html](https://www.berkshireeagle.com/news/local/epa-promises-close-scrutiny-of-the-ge-draft-plan-for-transport-of-pcb-waste-during-the-rest-of-river-project/article_11be8e0c-9461-11ee-ba04-3b58298e9176.html).

Mr. Lawrence Culp, Jr.

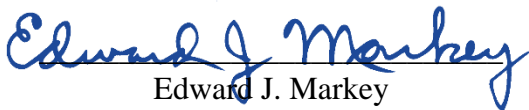
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Similarly, GE appears predisposed to use trucks instead of rail for the removal of contaminated material to the off-site disposal facility. But the proposal fails to examine any reaches in detail beyond the initial Reach 5A, leaving it unclear how GE intends to proceed for downstream removal. Although some truck traffic may be unavoidable, the proposal recognizes that “the use of rail for the transportation of material off-site for disposal would reduce the extent of truck traffic for the minimum of 100,000 [cubic yards] of material designated for off-site disposal.”<sup>3</sup>

Public officials representing six towns affected by the Rest of River clean-up have clearly expressed their support for the use of rail, stating that “[t]he paramount importance of maximizing rail transport, both to the Upland Disposal Facility (UDF) and beyond state borders, cannot be overstated.”<sup>4</sup> These leaders highlight multiple benefits of prioritizing rail transport over trucks, including reducing vehicular traffic, protecting public health, limiting disruption to residents, and decreasing wear on municipal infrastructure. We urge you to listen to these key local stakeholders, as well as to the EPA, as you continue to work on the transport proposal and remedy its inadequacies.

Sincerely,



Edward J. Markey  
United States Senator



Elizabeth Warren  
United States Senator

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<sup>3</sup> Matthew Calacone, *General Electric Company On-Site and Off-Site Transportation and Disposal Plan* at 24, Arcadis U.S., Inc. (Oct. 31, 2023), <https://sempub.epa.gov/work/01/677632.pdf>.

<sup>4</sup> Letter from Stephen Bannon, Chair, Selectboard of Great Barrington, MA, et al., to Dean Tagliaferro, Site Assessment Manager, U.S. EPA (Dec. 2023), [https://www.townoflenox.com/sites/g/files/vyhlf3341/f/uploads/draft\\_2\\_-\\_gbr-lee-lnx-sbg-shf\\_trains\\_not\\_trucks\\_ltr\\_-\\_11.10.23\\_003.pdf](https://www.townoflenox.com/sites/g/files/vyhlf3341/f/uploads/draft_2_-_gbr-lee-lnx-sbg-shf_trains_not_trucks_ltr_-_11.10.23_003.pdf).