

## 11. Conclusions and Recommendations

Previous sections of this Revised CMS Report have presented detailed evaluations of each of the ten sediment remedial alternatives, nine floodplain soil remedial alternatives, seven selected combinations of sediment and floodplain alternatives, and five treatment/disposition alternatives under the three General Standards and six Selection Decision Factors specified in the Permit. This report has also considered the estimated combined costs of the sediment and floodplain alternatives when paired with the treatment/disposition alternatives. The Permit requires that GE “shall conclude the CMS Report with a recommendation as to which corrective measure or combination of corrective measures, in [GE’s] opinion, is best suited to meet the [General Standards] in consideration of the [Selection Decision Factors], including a balancing of those factors against one another” (Special Condition II.G.3).

As noted in the Executive Summary of this Revised CMS Report, based on a critical analysis of the evidence regarding the potential human health and ecological effects of PCBs, as well as the severe ecological damage that would result from remedial construction activities in the River and floodplain, GE has concluded that continuing source control and remediation activities at and near the former GE plant site and monitoring the effect of those activities, along with the ongoing natural recovery processes in the Rest of River, constitute the best remedial alternative for the Rest of River. GE has reserved its rights (including its appeal rights under the CD and the Permit) on this issue and all other issues on which GE has presented its position to EPA during the process to date. Nevertheless, as required by the Permit, GE has conducted the evaluations presented in this Revised CMS Report taking into account EPA’s HHRA and ERA and using assumptions, procedures, and other inputs that EPA directed GE to use.

In this context, GE concluded in Section 8 that, of the combinations of sediment and floodplain remedial alternatives under evaluation, the combination of SED 10/FP 9 would meet the General Standards of the Permit and would be “best suited” to meet those standards in light of the Selection Decision Factors, including a balancing of those factors against one another. In Section 9, GE concluded that, of the treatment/disposition alternatives, TD 3 is “best suited” to meet the General Standards of the Permit, based on consideration and balancing of the Selection Decision Factors, and would be the most cost-effective alternative.<sup>558</sup> Review of the combined cost information in Section 10 confirms those conclusions, including the conclusion that a combination of SED 10/FP 9 with TD 3

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<sup>558</sup> As noted in Section 9, the extent to which TD 3 is better suited to meet the Permit criteria than TD 1 (off-site disposal) in light of these factors would increase with the volume of excavated materials to be disposed of and the duration of the implementation period, and is less pronounced with the volumes and durations at and near the lower end of the range, such as under SED 10/FP 9.



(estimated to cost \$121 to \$146 million, depending on the location of the Upland Disposal Facility) is the most cost-effective combination of alternatives. Accordingly, GE has concluded – taking into account EPA’s HHRA and ERA and using EPA’s directives for the Revised CMS, as required – that a combination of alternatives SED 10, FP 9, and TD 3 is best suited to meet the General Standards of the Permit, including protection of human health and the environment, in consideration of the Selection Decision Factors, including balancing of those factors against one another.

This combination of alternatives would constitute a major sediment and soil removal project. It would involve the removal of a total of approximately 268,000 cy of river sediments, bank soils, and floodplain soils over 76 acres of the River and floodplain, with disposition of the removed materials within a secure, engineered Upland Disposal Facility to be constructed in an area near the River but outside the 500-year floodplain. It is estimated that, following design and preparatory work, this combination of alternatives could be implemented within a 5-year period and, based on the cost estimates presented in Section 10, would cost approximately \$121 to \$146 million. However, given GE’s reservations of rights noted above, this Report does not constitute a proposal to implement these alternatives.