

EPA-GE Citizen Coordinating Council
April 24, 2007
Meeting Highlights

Participants: See attached list

Introduction: Suzanne Orenstein, Facilitator, and Dean Tagliaferro, EPA Project Manager, opened the meeting with a round of introductions and a review of the agenda. Topics for discussion in this meeting included:

- EPA Personnel Changes
- Status of clean up at specific Consent Decree sites in Pittsfield
 - Hill 78 status and storm drain and sewer relocation
 - OPCAs
 - Silver Lake, including monitoring of outfall to the river
 - Unkamet Brook, including flow monitoring
 - Lyman St. parking lot remediation
 - East St. Area 2-North, including Building 100 area
- West Branch
- Commercial St. (questions)
- Monitoring in River
- NPDES

EPA Personnel Change

Dean Tagliaferro noted in the introductions that there are two new project managers working on the Pittsfield project, replacing Bill Lovely and Sharon Hayes. They are Rich Fisher and Skip Hull, and both were present at this meeting. Also, Angela Bonarrigo, former community outreach specialist for EPA, has left EPA to work in the private sector. Jim Murphy has replaced her on the project, and he was also present at this meeting.

Status of Clean-Up at Specific Consent Decree Sites

Hill 78 - Remainder

Dean reported on the proposed relocation of storm and sewer drains at Hill 78, showing on a map that the storm and sewer drainage lines would be relocated around the perimeter of Hill 78 OPCA, eliminating the drainage that is currently going under the OPCA. The new storm drainage line will tie into the existing outfall south of the Hill 78 OPCA. The sanitary sewer will reconnect to the existing sanitary sewer south of the Hill 78 OPCA.

Question Will the outfall water be tested under NPDES?

Answer: If the permit currently requires testing, then sampling will, be required. Also, EPA required GE to sample the water in the drainage swale as part of the characterization of the area and it found that the PCB concentrations were very low. PCB results for the current pipes and drainage swale can be found on EPA's web site. The process also involves soil sampling for the areas where the new pipes will be located.

Update on OPCAs

Building 71 OPCA. The final cap was placed on the Building 71 OPCA last year. The cap included a membrane and two feet of clean soil, and was seeded. This year more soil will be added to complete a drainage swale to prevent erosion. In addition, minor erosion was observed after a heavy rain event in April and GE will replace soils washed out from the rain event. Additional seeding will be done as well. A formal inspection of the cap is scheduled for spring 2007.

For the Hill 78 OPCA, which is now at 85% capacity, GE will initiate final capping of a minimum of 1.9 acres starting after Memorial Day. That capping effort should take two months. At present, there is not a lot of material designated for disposal at Hill 78. GE is considering placing some building demolition debris there, which could result in Hill 78 reaching capacity in a year or two. The demolition debris will come from buildings that are ready to be demolished. Only debris with PCB concentrations under 50 ppm will go to the OPCA. Weekly air monitoring for PCBs will be performed during the capping operations, with data posted on the EPA web site regularly.

Question: What are the large piles of staged material adjacent to East Street?

Answer: These piles are material used during the 1.5-Mile construction. These materials have been tested for contaminants. Results show that this material is suitable for construction activities on the GE Facility, such as, backfill for the Lyman Street parking lot cap.

Q. Can building demolition debris be placed into Hill 78 OPCA.

A. If the material is less than 50 mg/kg total PCBs then placement into the OPCA is possible. Material greater than 50 mg/kg total PCB will be sent to an offsite disposal facility.

Q. What is the size of the building demolition debris?

A. The debris is similar to the 40s complex debris (i.e., approximately 3-inches in diameter or less).

Q. Will material excavated from Lyman Street parking lot be placed at the Hill 78 OPCA?

A. There is a possibility that a small amount of material may be placed in the Hill 78 OPCA. It would be tested and placed in the OPCA if it qualifies. (See additional information below on Lyman St. project work.)

Silver Lake

Susan Svirskey addressed questions about the monitoring of the outfall from Silver Lake during the pilot study of the capping proposal. She noted that GE is performing monthly outfall monitoring for PCBs and total suspended solids, and that they are measuring flow as well for use in developing a rating curve.

In response to questions about discharges that turned the full lake grey last summer, Susan explained that the pilot study conducted to better understand the proposed capping process involved placing a sand and loam slurry on the bottom of the lake. The

slurry was placed through a floating pipe and dispersion screen. The clean loam did not settle as quickly to the lake bottom as the sand. During this time, turbidity and total suspended solids were being monitored, and GE has data that show what the suspended soil concentrations were. These data are on the web site now, but are not summarized. EPA will ask GE to organize and present the data in a more understandable format. This data will also be part of the report that GE submits to EPA and will be the subject of a CCC meeting in September 2007. (After the meeting, GE provided a turbidity chart which is being distributed with these meeting highlights—see attached.)

Q. Is groundwater a factor leading to high turbidity during capping operations?

A. EPA does not believe groundwater is a factor. A review of data collected during the pilot study explains the turbidity issue. These data will be available in GE's September 2007 Silver Lake Pilot Capping Study Report.

Q. How has the pilot study worked to this point?

A. The study is doing what it was designed to do. GE has learned a great deal of information relating to engineering aspects of the cap. This information will provide useful during full-scale construction of the cap.

Q. Have there been positive PCB concentrations detected in the cap at the pilot site?

A. The majority of sample locations have non-detected concentrations for PCBs. There are a few areas that have PCB hits due to various factors. These factors include vandalism to equipment, movement of buoys, and thicker lift placements than anticipated, primarily in areas where material was placed with an excavator after GE's other placement equipment was vandalized.

Q. Were PCBs detected in all three cells of the pilot study?

A. Yes, PCBs were detected in certain areas of each cell. The majority of PCBs detected were from areas along the bank and are a result of thick layer placement with an excavator. This information will be useful to mitigate resuspension of PCBs during the design of the full scale cap.

Q. Were PCBs detected in the water column?

A. Yes, PCBs were detected in the water column. EPA will request GE to publicly release data associated with the pilot study.

Q. Would it be possible to drain Silver Lake to determine the presence of natural springs?

A. It would not be possible to drain Silver Lake. EPA recognizes that there is groundwater infiltration to Silver Lake. For this reason, all the cap designs in the pilot study were permeable caps, including the use of permeable geofabrics, and the final cap design will be a permeable cap.

Q. Has the fallen tree near the east bank had a negative effect on the cap integrity?

A. The effect on the cap is presently unknown.

Q. Has GE left equipment in staging areas?

A. No equipment has been left to EPA's knowledge.

Q. How long is GE required to monitor Silver Lake?

A. The long-term monitoring requirements will be a part of GE's proposal. EPA has the right to approve or disapprove the monitoring plan developed by GE

Q. Will GE be given any release from liability regarding Silver Lake?

A. GE will receive a Release of Liability if they satisfy the Consent Decree. EPA is permitted to re-open the Consent Decree in the event of unknown or new conditions.

Silver Lake Bank Remediation

Dean Tagliaferro added information about the remediation of the Silver Lake banks that will be coordinated with the capping process. He noted that sampling of the banks shows some PCB contamination, as well as heavy metal contamination including lead, chromium and cadmium. Further sampling is planned, and should be completed in May. Under the consent decree, GE is responsible for addressing all of the contamination, and can pursue other responsible parties if it desires. EPA has not identified any other PRPs.

The bank remediation and sediment cap target removals based on performance standards. GE will be required to integrate the bank remediation with the sediment cap program. For example, the recreational clean up standard for bank soils is 10-15 ppm for PCBs. The banks and the cap need to be compatible in slope. The anticipated start date for these programs is late summer or early fall of 2008.

Question: What remediation will be needed for the residential properties along the lake?

Answer: Four or five properties were remediated under the Mass DEP fill program. A few residential properties on 4th Street need to be assessed.

Question: Has the inflow to Silver Lake ever been tested for PCBs?

Answer: The inflow from GE has been evaluated and shows PCB contamination. There are also two or three outfalls from city storm drains. They may not have been sampled.

Comment: It does not make sense to spend millions of dollars on a remediation for Silver Lake and not determine if contaminants are in the inflow.

NPDES Permitting Process

Dean Talgiaferro read an update from Roger Janson at EPA on the NPDES permitting process, as follows:

The Region is continuing its effort to complete the review of the broad spectrum of comments received on the draft permit and to finalize the "Response to Comments" (RTC) document that will accompany the issuance of the final permit. A number of adjustments to the draft permit need to be made: for example, GE has eliminated approximately 17 outfalls/discharge points since the draft permit was public-noticed. Likewise, those outfalls in the draft permit that have since been transferred to PEDAs concurrent with the land transfer also need to be eliminated from final permit coverage.

The permit has been designated as a "Priority Permit" by the Region and, as such, needs to be finalized as soon as practicable.

Contact information for Mr. Janson is 617/918-1621, janson.roger@epa.gov.

Lyman Street

Capping of the parking lot at the Lyman St. site will go forward this year. GE will place a two-foot cap over the majority of the parking lot. The cap will consist of an impermeable liner covered with backfill and topsoil, and it will be seeded. The project plan requires compensatory flood storage within the same flood plain to make up for the loss of impervious surface as a result of the paving. The flood storage probably will be provided in the 60s project, which is not yet underway.

The Western MA Electric Co. property will have some minor excavation with the area to be backfilled to existing grade. This is part of the Lyman St. project.

East St. Area II North

GE will conduct remediation in the Building 100 area. An estimated 1,000 cubic yards are planned for removal. The level of contamination is above 50 ppm, so the material will be disposed offsite.

Comment: Citizens for PCB removal would like Building 14 to be preserved as a museum of transformers. They have asked GE and the city many times to allow this, with no results.

Unkamet Brook

Susan Svirsky reported that EPA expects to receive GE's proposed plan for Unkamet Brook on May 23 (subsequently GE has been given a 70-day extension). She explained that for administrative reasons, the Unkamet Brook RAA was separated into two areas, Unkamet Brook West and Unkamet Brook remainder. The West area includes the western area with the buildings and parking lots. Unkamet Brook Remainder includes the former landfill, the brook and wetland areas.

EPA requested that GE develop a watershed model for the portion of Unkamet Brook subject to re-routing. GE is in the process of installing flow monitoring equipment to support the watershed study. EPA and GE are planning to coordinated future activities with the City of Pittsfield's work in the watershed upstream.

Update on the Status of Monitoring in the East Branch

Dean Tagliaferro reported on monitoring activities, explaining that this is the year that sediment monitoring is required for the ½ Mile Removal, and that sediment in the 1 ½ mile Reach would also be sampled. He noted that the sampling plan for sediment will be implemented in June 2007, in 39 locations in the ½ Mile Reach and over a 100 samples in the 1 ½ Mile Reach.

Question: How long with the monitoring of sediment go on?

Answer: GE is require to sample at five-, ten-, and 15- year intervals, and then GE is required to submit a proposal to EPA for long-term monitoring.

Question: The final report on the ½ project showed some PCB hits. What is the status?

Answer: GE has been collecting monthly water column samples (not sediment sampling) at the Newell Street and Lyman Street bridges. The majority of these sample results have been non-detect for PCB concentrations.

Question: Is EPA going to do any biota sampling?

Answer: None is required for the ½ mile. For the 1 ½ mile, EPA has identified three areas to be sampled for macroinvertebrates as part of this year's monitoring. These areas are being sampled to see if there is any bioaccumulation of PCBs in the native organisms and to compare concentrations with pre-remediation samples.

Question: Are you currently monitoring the main stem?

Answer: We find some hits in surface water at Lyman and at Newell St. Surface water sampling continues at numerous locations below the confluence. We are also testing the cap sand below the rocks in the areas that were remediated this year in order to see if there is upward migration of PCBs through the cap or whether the cap is desorbing them. The theory of the capping process is that over 100 years, PCBs will be only in the first inch of the cap, and that over 200 years, they will be only in the first six inches, and so on up to 400 years of protection. If we find that the contamination moves through the cap more quickly, the Consent Decree has a provision for reconsideration of GE's responsibility and remedy.

Commercial St. Properties

In response to a question about some monitoring that is occurring on Commercial St., Susan Steenstrup from DEP noted that DEP is investigating possible vapor intrusion at one property in that area. She noted that the investigation is ongoing, and that citizens concerned about risk should contact Joanne Flescher at DEP at 413-755-2292.

West Branch Update

Susan Steenstrup of MassDEP provided an update of the status of GE's proposal to remediate the section of the West Branch adjacent to Dorothy Amos Park. She noted that at the time of the last update to the CCC, in May 2006, GE had proposed a removal program to achieve an average of 0.4 ppm in both the top foot and top three feet of sediments. That proposal underwent review by MassDEP's Office of Research and Standards (ORS). ORS concluded that the proposed sediment cleanup levels would be consistent with EPA's Ecological Risk Assessment, the Interim Media Protection Goals and previous work by ORS on food-chain modeling for PCBs and would be protective of most receptor groups. However, ORS had some concerns whether the proposed sediment cleanup levels would be protective of fish, fish-eating mammals, and human consumption of fish.

MassDEP's September 2006 conditional approval gave GE three options: 1) perform a Method 3 Risk Characterization; 2) remove all sediments in the work area with detectable levels of PCBs; or, 3) perform post-remediation fish sampling to evaluate the adequacy of the cleanup. Relative to bank soils, MassDEP approved a cleanup to PCB concentrations of 10 ppm in the top foot and 15 ppm in the 1- to 3-foot depth interval, if GE obtained an activity and use limitation (AUL) for the riverbank. Alternatively and without an AUL, GE would be required to clean riverbank soils to an average PCB concentration of 2 ppm for unrestricted use. Under the two alternatives, between 85 and 185 c.y. of riverbank soils would be removed. MassDEP's approval also required

sampling for Appendix IX constituents in bank soils and sediments, unless full sediment cleanup would be performed. MassDEP also required a contingency plan for dealing with NAPL, and design plans for stabilizing the channel and banks against erosion (e.g., rip-rap).

In October 2006, GE selected the option of removing all contaminated sediment, constituting a volume of 900 c.y. Since the decision about whether to use residential or recreational standards for the banks has not been made yet, GE proposed an Appendix IX approach for sampling and cleaning the riverbanks that was similar to that used at the Dalton Avenue Site, if a recreational cleanup (with an AUL) was selected, and to that used on the residential fill properties, if a cleanup to a PCB concentration of 2 ppm was selected. GE also proposed a surface water monitoring program that would start two weeks before the start of the remediation effort, and involve weekly sampling of PCBs and TSS. Turbidity would be monitored in 15-minute intervals, and if there is an exceedence in the surface water, instantaneous sampling would be required to determine if the exceedence is related to the remediation work. In November, 2006, DEP issued an approval letter for the project.

In February, 2007, GE submitted a proposal for additional Appendix IX and groundwater sampling, and that was approved in March 2007. In April 2007, GE submitted a proposal to further delineate lead exceedences and MassDEP approved the proposal and required the submission of the Remedial Action Work Plan by mid-May. Work is projected to begin in late summer/early fall this year. GE is working to obtain the U.S Army Corps of Engineers permit for this work in the river. This process is expected to take up to 3 months.

Question: Will the sediment be dewatered?

Answer: Yes. They will use a sheetpiling process similar to that used in the ½ and 1 ½ mile projects. Approximately 900 cubic yards of material is planned for removal.

Question: How long will the project take?

Answer: Months, not years.

Action Items from Meeting

1. EPA will work with GE to organize turbidity data from the Silver Lake TSS testing to be more user-friendly. (provided with this summary)
2. EPA will explore with the NPDES program and the City of Pittsfield to see if the City will test its storm drain going into Silver Lake for PCBs.
3. EPA will work with the City to obtain and post on the web site its proposed study of flooding from Unkamet Brook.
4. EPA will notify the CCC when updated data from macroinvertebrate sampling is posted.

Next Meeting

The next CCC meeting will be held on June 13, from 5:30 to 7:30 at the Cranwell Resort, in the Tanglewood Room, in Lenox MA. The meeting will include a technical overview of floodplain restoration methods.

The meeting adjourned at 7:30 PM.

**EPA-GE Citizen Coordinating Council
Meeting – April 24, 2007**

Participants

Thelma Barzottini, Citizens for PCB Removal (CPR)
Rich Fisher, EPA
Tim Conway, EPA
Dave Gibbs, Housatonic Restoration Initiative
Judy Herkimer, Housatonic Environmental Action League
Jane Winn, Berkshire Environmental Action Team
Barbara Cianfarini, CPR
Charlie Cianfarini, CPR
Skip Hull, EPA
Sue Steenstrup, MA DEP
Carolyn Sibner, Housatonic Valley Association
Susan Svirsky, EPA
Dean Tagliaferro, EPA
Jim, Murphy, EPA
Suzanne Orenstein, Facilitator
Dick McGrath, EPA Consultant
Scott Campbell, Weston Solutions