

Citizen Coordinating Council
September 19, 2007
Meeting Highlights

Participants: See attached list.

Meeting Location: Crowne Plaza Hotel, Pittsfield Massachusetts

Introduction: Suzanne Orenstein, Facilitator, opened the meeting with a round of introductions and review of the agenda. Suzanne also explained the purpose of the CCC and highlighted the ground rules. The purpose of this meeting is for EPA to provide updates regarding the status of soil-related removal actions, post-remediation sampling results for the 0.5-Mile and 1.5-Mile, and EPA's Rest of River Public Outreach Program for the Corrective Measures Study Process.

Progress Report on Soil Removal and Site Remediation

Dean Tagliaferro provided a brief overview of the soil-related removal actions. Of the 19 Remedial Action Areas (RAA), 13 have been substantially completed. Among the updates he provided are the following:

- Lyman Street Parking Lot - the cap is scheduled for completion this year.
- 0.5-Mile – GE has repaired the post-remediation bank erosion by installing armor stone.
- Hill 78 Consolidation Area- Approximately three of the six total acres of Hill 78 have been capped. Hill 78 is currently at 85% capacity. Next year, Hill 78 will most likely accept building demolition debris. The final cap for Hill 78 is scheduled for 2008, with activity possible into 2009. GE has agreed to re-route the storm drain and sanitary sewer that runs under Hill 78. The storm drain and sanitary sewer will be re-routed around the perimeter of the Hill 78 footprint. GE plans to start this work in mid-October and complete the re-routing by January or February of 2008.
- East Street Area II North – GE will remove approximately 800 to 1,000 cubic yards of contaminated soil in 2007 and into 2008.
- East Street Area II South – EPA expects remedial activities in 2009 for this removal action area.
- Silver Lake - GE will submit the Silver Lake Pilot Study report by the end of September. A conceptual work plan for Silver Lake banks has been submitted for EPA review. The Silver Lake bank and sediment projects will be merged prior to the start of remedial activities. EPA expects the construction of the Silver Lake cap to begin in 2008 and finish in 2009.
- Unkamet Brook – Unkamet Brook has been divided into two areas for administrative purposes. The major components are (1) the industrial areas and (2) Unkamet Brook, the old landfill, and floodplain areas. EPA expects remedial activities in the industrial areas to start in 2010. Remedial activities for Unkamet Brook, the landfill and floodplain areas will start after the facility work has begun.

Discussion and Questions and Answers Regarding Soil-Related Activities

Q. What is the nature of the 800 cubic yards of material from East Area II North? What are the PCB concentrations and where is the material being placed for disposal?

A. Approximately 600 cubic yards of material has greater than 50 ppm PCBs, and will be going off-site to an out-of-state licensed disposal facility. The remaining 200 cubic yards of soil is contaminated with solvents, which will be characterized for disposal. Depending on the characterization, this material may go to the Hill 78 OPCA.

Q. The Lyman Street parking lot cap is increasing the height of the area. How is flood storage compensation being considered?

A. Compensation is considered on a Reach-wide basis. GE has met the compensation requirements with building demolition, soil removal, and other activities conducted within the 0.5-Mile Reach.

Q. Should there be concerns with children playing soccer and kids digging at Lakewood Park?

A. There are no safety issues in the playground. The playground was not in the area which needed soil remediation under the Consent Decree, and it was not remediated.

Q. Will the pipes under Hill 78 be removed?

A. The two lines under Hill 78 are a sanitary sewer line and a storm drain. These pipes will not be removed, but will be filled with cement and capped. The new lines will be run around the footprint of Hill 78.

Q. Will monitoring be conducted during construction activities?

A. Yes, oversight will include air monitoring and dust monitoring.

Q. How is the process able to circumvent Massachusetts law that states landfill can not be located within 2000 feet of a school?

A. The landfill at Hill 78 predated Allendale School. Hill 78 and Building 71 are within the defined site of the Consent Decree, so they did not require a permit. As part of the Consent Decree, EPA made a determination that the landfills met the protectiveness requirements, which is what is required under CERCLA/Superfund.

Q. How big are the pipes under Hill 78?

A. The storm water pipes are 48-inches in diameter, and the replacement pipes will be the same size. The existing sanitary sewer pipe is 10-inches in diameter, and the replacement will also be the same size.

Q. What are the PCB concentrations in the ground surrounding the pipes?

A. GE collected approximately 15 soil borings along the new line of the pipes. The majority of samples have very low concentrations.

Q. Are the new lines designed with sediment collection areas?

A. No, the lines have are not designed with sediment collection areas. The city is reviewing the design for the lines. The standard design is manholes at the tie-ins.

Comment: There is an issue with storm drains and scouring. The NPDES process showed that PCBs are migrating back into river during storms. PCB loadings continue and warning signage may have to be placed along the river in the future. GE should try to use better and more modern storm drains.

Q. Regarding the existing pipes, what drove the relocation of the pipes?

A. GE was instructed to evaluate the pipes under Hill 78. Based on the investigation of the integrity of the pipes, GE was required to either repair or re-route the pipes. GE elected to re-route them.

Q. Will there be additional sampling at the outfall?

A. The outfall was sampled previously under the Consent Decree. Additional sampling may be required under NPDES permit. EPA's NPDES office is working on the NPDES permit and currently estimates it will be issued at the end of 2007.

Q. Will the excavations be sampled down 25 feet?

A. The excavation areas were sampled in advance to depths up to 25 feet.

Q. During construction activities will there be air monitoring?

A. There will be monitoring for both dust and PCBs.

Post-Remediation Sediment Sampling for the 0.5-Mile and 1.5-Mile Reaches.

Dean Tagliaferro gave a presentation that included the results for both pre-remediation sampling of PCBs in sediment in the first two-miles of remediation in 1999 and post-remediation sampling in 2007.¹

Dean covered the following topics:

0.5-Mile Reach and 1.5-Mile Reach

- Average Pre-Remediation (pre-1999) Sediment PCB Concentrations
- Post-Remediation Sediment Sampling Results
- Percent Reductions in PCB Concentrations
- Summary of Upper Two Miles in surficial sediment PCB concentrations

Dean summarized the surficial sediment sampling results as follows:

- Sampling showed a greater than 99% reduction in PCBs in surficial (0-6 inches) sediment in the remediated areas.
- The average post-remediation surficial PCB concentration was 0.19 ppm.

¹ The complete presentation slides for this report are posted at <http://www.epa.gov/region01/ge/publiceventsandmeetings/20070919/275793.pdf>

Discussion and Questions and Answers Regarding the 0.5-Mile and 1.5-Mile Sediment Sampling Presentation

Q. Were the sampling locations on the riverbanks?

A. No, the samples were collected in the portion of the channel under water during low flow conditions.

Comment – One panel member does not believe that the 99% reduction in PCB sediment PCB concentrations is possible. EPA explained that any re-contamination of PCB is not an additive process, and that EPA's expectations are that the concentrations will continue to decrease over time.

Q. What is EPA attributing PCBs in the remediated areas to?

A. In any large scale dredging project there is always residual concentrations remaining. A goal of zero PCBs would not realistically be achievable. EPA Guidance assumes a lowest residual concentration of 1%. EPA also does not expect that there will be zero PCBs loads to the river post remediation. There are several sources of continuing PCB loads to the river that include; bank erosion, outfall pipes, and sediment upstream of the 0.5-Mile reach. In addition, there are atmospheric loads of PCBs that enter the river.

Q. Can EPA characterize the river in terms of swimmable and fishable?

A. The risk assessments determined that the Rest of River portion of the river is swimmable, as would be the two miles that have been remediated. In terms of a fishable river, contaminated fish from non-remediated areas move easily into the remediated areas. A determination regarding the fishable designation cannot be made until after any remediation occurs in Rest of River.

Q. What is the prevalence of PCBs in Pittsfield?

A. PCBs come from other sources outside of the facility. There are loads from atmospheric deposition that must be considered. During the risk assessment process, EPA detected PCBs in fish in areas outside of the basin (e.g., Three-Mile Pond). EPA realizes that there will be non-zero loads to the river from tributaries and upstream of the facility. The model for predicting remediation results assumes non-zero PCB loads in the remedial scenarios being evaluated.

Q. Were samples collected deeper than 6 inches?

A. In general in the 1.5 Mile Reach, no. Samples were collected only from the top 6-inches. In most areas, armor stone is at depth.

Q. Are there plans to test sediment below 2 feet?

A. EPA has sampled down to depths of 13 feet in the Rest of River.

Q. In a Pittsfield Gazette Article from August 7th there is an article regarding an Environmental Restriction Easement (ERE) for Lakewood Park. Why is there an ERE for this property?

A. An ERE was needed because the area did not meet residential standards, although it does meet recreational standards. The ERE is in place to prevent certain future uses that might be similar to residential use (e.g., a day care) from operating on a small portion of the property, which is located in the northwest corner of the property.

Q. The 0.5-Mile post-remediation sampling found a sample with 11 ppm PCB. Could this be indicative of other hot spots in the 0.5-Mile?

A. Possibly.

Q. Should we take a closer look?

A. The sample results are being reviewed and evaluated.

Comment – HRI observed and is concerned about a visible oil spill on the river during a rain event. The spill may have been motor oil or something else or related to the site. HRI feels that it may have been beneficial to have collected a sample. It is in our interest to know what the spill is composed of.

Response – The Massachusetts Department of Environmental Protections (Mass DEP) is investigating and following up on the spill. Initial observations indicate that the sheen may have been gasoline. MA DEP is reviewing potential source locations with the City of Pittsfield.

Q. Didn't the mussel studies in the 1/2 Mile Removal come up positive for PCBs?

A. Yes, however, re-suspension and residual are factors during remediation. The studies were not designed to provide information regarding post-remediation conditions. The studies were designed to provide information on effects during the remediation.

Comment – There is a massive mobile plume in the area under the river. PCBs have been moved or stockpiled, but not destroyed. The river is still threatened.

2007 1.5-Mile Reach Benthic Invertebrate & Fish Surveys

Dean Tagliaferro briefly introduced Dick McGrath of Sleeman, Hanley & DiNitto, who gave a presentation on recent surveys of invertebrates and fish in the remediated portions of the river. The presentation included information on results for both pre-remediation sampling in 2000 and post-remediation sampling in 2007 and fish survey results.

Dick covered the following topics:²

Benthic Community Characterization and Value

- 2000 and 2007 1.5-Mile Sampling (post and pre-remediation)

June 2007 1.5-Mile Reach Fish Survey

² The complete presentation slides for this report are posted at <http://www.epa.gov/region01/ge/publiceventsandmeetings/20070919/275793.pdf>

- Count by Species
- Observations

In summary, Mr. McGrath presented information that showed:

- Ecosystem recovery reflects the reduction in PCB concentrations of approximately 99% as determined in the post-remediation sediment sampling.
- The benthic community has higher diversity, increased abundance, and increased presence of pollution-intolerant taxa.
- A 99% reduction in PCB tissue concentrations in the invertebrates was measured
- There is a diverse and abundant fish community now found in the 1.5-Mile Reach.

Discussion and Questions and Answers Regarding Benthic Community Sampling and Fish Survey

Q. Do the pollution-intolerant taxa (EPTs) increase over time or is there change because of the different substrate post-remediation.

A. The post-remediation habitat is playing a role but is not the only factor.

Q. Are fish tissue samples supposed to be collected at this point in Consent Decree?

A. No, fish tissue sample collections are not required in 0.5-Mile or 1.5-mile based on Consent Decree. Fish tissue samples would not provide relevant information at this point in the process given that fish can enter the area from non-remediated areas.

Q. Should a caged minnow study be implemented to study effects of re-contamination?

A. This type of study is not recommended to study effects of re-contamination. These studies are designed to measure re-suspension during remedial actions. For the Rest of River process there will be a long-term monitoring plan. There currently exists an extensive pre-remediation data set.

Q. When was the 1.5-Mile remediation considered complete?

A. The 1.5-Mile remediation was considered complete in the March to April timeframe of 2006.

Comment – A member of the CCC expressed concern that juvenile fish were not collected during the 2007 fish survey.

Response – EPA did observe juvenile fish, however, the survey techniques are not designed to collect juveniles.

Comment – A member of the CCC mentioned that the fish survey may have detected fish stocked by Mass Wildlife.

Response – Mass Wildlife stocks only brown trout in the upper portion of the Housatonic River. During the 2007 fish survey one brown trout was observed, and it presumably came from the fish stocking effort because it is not native to the remediated area.

Comment: the MA Fish and Wildlife Agency would like to see a target community developed for fish communities in the river as a restoration objective.

Update on DEP Activities

Susan Steenstrup of DEP provided the following updates on DEP activities related to the remediation.

Springside Reservoir: General Electric (GE) has agreed to inspect the interior of the reservoir, if safe access can be obtained. If sediments are encountered within the reservoir, GE has agreed to collect samples for PCB analysis. Based on what is found in the sediments, GE has agreed to consider an iterative approach to further sediment or soil sampling and evaluation of the pipe network. GE has agreed to submit a proposal to perform these evaluations within the next several weeks.

Dalton Avenue Site: An Environmental Notification Form (ENF) was filed under the Massachusetts Environmental Policy Act (MEPA) in August, with a Certificate being expected to be issued by September 21. Applications for a Water Quality Certification (under Sec. 401 of the federal Clean Water Act) and a 404 permit (under Sec. 404 of the Clean Water Act) have been submitted to MassDEP and the U.S. Army Corps of Engineers, respectively, for review and approval. GE is preparing a Notice of Intent (NOI) under the Massachusetts Wetlands Protection Act for submittal to MassDEP for review and approval. Work may commence this fall, following receipt of all necessary wetlands-related approvals.

Commercial Street Site: MAA DEP approved a Phase III Remedial Action Plan (containing an alternatives evaluation of remedial options) on August 21, 2007. A Phase IV Remedy Implementation Plan is due to be submitted to MassDEP on December 21. This report will describe the design and implementation of the selected remedial alternative. The only type of wetlands permit that will be required at this site is an Order of Conditions under the Wetlands Protection Act.

Hope Street & Radcliffe Avenue: An Order of Conditions and an ENF Certificate have been issued for the project. Both 404 and 401 approvals are pending. Work is expected to take place this fall, since work must take place between the months of November and April, in order to protect an endangered species, the bittern.

West Branch: An NOI, 401 application, 404 application and Ch. 91 (Waterways) application will all be submitted in early October. Work is expected to commence next spring after all necessary federal, state and local permits and approvals have been obtained.

Q. Is the remedial work for the properties adjacent to Unkamet Brook being coordinated with the City of Pittsfield?

A. Yes, the Unkamet Brook projects are being coordinated with the City of Pittsfield.

Q. Please provide the reason for an ERE requirement for the Lakewood Playground.

A. In the Consent Decree there are three levels of remaining risk allowable. Lakewood Playground falls within a restriction allowing recreational but not residential use of the area. The ERE is needed to address those properties that do not meet residential levels. Under the Massachusetts Department of Environmental Protection regulations, the City of Pittsfield is required to have an environmental restriction based on these conditions.

Community Outreach for Rest of River

Susan Svirsky provided a presentation about EPA's plan for a community outreach effort for the Rest of River project for the Corrective Measures Study (CMS) Process.

She noted that EPA plans to communicate with the citizens in cities and towns, including Pittsfield, Lenox, Lee, Great Barrington, Sheffield and Connecticut, about the CMS and the EPA decision-making process for remediation for the Rest of River. The purpose of these outreach efforts will be to provide an opportunity for the public to interact with EPA and exchange information about the CMS process. EPA will develop a presentation for meetings and a fact sheet for general distribution. Meetings will be advertised to the general public via press releases and email notices. The meetings will be scheduled between November 2007 and March 2008.

Discussion and Question and Answers Regarding the Outreach Presentation

Q. What is the informal public comment period?

A. EPA is providing an informal comment period for the Corrective Measures Study Report. A formal public comment period is not mandated in the RCRA program.

Comment – A member of the CCC panel requested that the Crown Plaza not be used for future meetings.

Q. How much river frontage did GE acquire with the purchase of property from the Butler's and Nobel's?

A. The exact amount of frontage is not know at this time, but may be approximately one mile.

Q. Did the agricultural preserve designation for these properties transfer in such a way that agriculture can still continue?

A. Yes.

Public Comment Period

Valerie Anderson, a member of the public spoke of her father's employment of 40 years in the GE Transformer Division. She recently relocated to Pittsfield after 4 years. She thanked all the parties involved for the work completed to date. She is concerned with Hill 78 and the transfer of contaminated materials to a toxic waste dump in the middle of city. As a parent she has concerns with children playing at Allendale School. Recently

she observed her son playing at Allendale School and climbing the Hill 78 fence to retrieve balls.

She is disheartened by, what she considers to be, the general public lack of concern about the landfills. She believes that residents of Pittsfield should pressure people at GE to do something. She implored the GE representatives to have conversations with GE Corporate and provide a better clean-up for Hill 78.

Tom Fontaine, another public commenter, noted that he was in complete agreement with the first series of comments. He inquired as to why PCBs cannot be burned. His additional comments focused on the continuing water column PCB loads from Silver Lake and the projected contamination impacts from remediating the lake. Lastly, he noted that he does not believe that the Silver Lake cap will be effective in mitigating PCB loads, and that the lake will never be usable.

Q. Why were the former GE buildings on the PEDDA property demolished?

A. These building were not required to be demolished per the Consent Decree. PEDDA elected to demolish the buildings.

Schedule for CCC Meetings for 2007-2008

The proposed schedule of CCC meetings is as follows:

September 19-MA	Updates on Pittsfield remediation activities, Rest of River outreach plan, and CCC schedule
November 28-CT	Ecological Restoration following Sediment and Soil Removal, including two case studies
December 5-MA	Silver Lake Pilot Report and update on Rest of River process
March 26-27-MA & CT	Corrective Measures Study Results
June	TBD

**EPA-GE Housatonic Project Citizens Coordinating Council
Attendance 9-19-07**

Name	Organization	Email Address	Attended
Members			
Thelma Barzottini	Citizens for PCB Removal		X
Barbara Cianfarini	Citizens for PCB Removal	bcianfar@hotmail.com	X
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Additional Attendees

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