

**CCC Meeting
Kent Town Hall, CT
March 26, 2008**

Meeting Highlights

Participants: Forty-nine people attended the meeting. The list of participants is included in Attachment 1.

Opening Remarks: Suzanne Orenstein, Facilitator for the CCC, opened the meeting with a round of introductions of all present. She described the goal of the meeting, which was for GE to present its proposal for Corrective Measures for the Rest of River (ROR) project in the Housatonic below the area already remediated in Pittsfield, MA. The Consent Decree and RCRA Permit require GE to evaluate corrective measures for addressing PCB contamination in the Rest of River area, and to submit a proposal for the alternative that GE believes is best suited to meet the review criteria.

Presentation on the Corrective Measures Study: The slides from the presentation are posted on EPA's web site at <http://www.epa.gov/ne/ge/publiceventsandmeetings/20080327/286036.pdf>. EPA also published a fact sheet describing the Corrective Measures Study presented at this meeting. It can be viewed at <http://www.epa.gov/region01/ge/thesite/restofriver/reports/gereportsndocs/285796.pdf>.

Andy Silfer, GE Project Manager, and Stuart Messuer from Arcadis, a consultant to GE, presented the results of GE's analysis of the alternatives for addressing the contamination in the Rest of River. Mr. Silfer reviewed the requirements of the Consent Decree, and the organization of the river into reaches for analysis and planning. He also discussed the computer model developed by EPA, which GE is required to use, along with historical and scientific data, to estimate the effectiveness of the various alternatives. He reviewed the criteria that must be used to evaluate each alternative as required in the RCRA Permit.

Mr. Silfer explained that GE identified a range of potential remediation techniques and eliminated what was not technically feasible or implementable. The remaining alternatives were studied in detail during the study. The results of the evaluation led GE to conclude that the combination of alternatives SED 3 (sediment), FP 3 (floodplain), and a local upland disposal facility would be best suited to meet the evaluation criteria in their opinion.

This combination of alternatives would involve removal with capping, of approximately 167,000 cubic yards of river sediment and bank soil over 42 acres of the river between the confluence and the vicinity of New Lenox Road (approximately 5 miles), apply monitored natural recovery (MNR) in Reach 5B (approximately 2 miles) and the upper 1.8 miles of Reach 5C, and apply enhanced monitored natural recovery through the placement of a thin-layer cap in an additional 97 acres of river in the downstream portion of Reach 5 C (approximately 1.5 miles) and Woods Pond, with MNR in the remaining areas downstream. In addition, this combination of alternatives includes the removal of approximately 60,000 cubic yards of soil from 38 acres of the floodplain. In this combination of alternatives, the river sediment and bank and floodplain soil removed would be contained in an upland disposal facility located in an area near the river but outside of the 100-year floodplain. GE estimates that following design and site preparation,

these alternatives could be implemented within 10 years at a cost of approximately \$184 million. GE noted that it has included reservation of rights to dispute resolution in the CMS Report, and that the proposal does not constitute a proposal to implement these alternatives.

Stuart Messuer, a consultant to GE on the CMS from Arcadis, presented a detailed overview of the comparison of the alternatives against the evaluation criteria. The evaluation criteria include:

- Remedial Action Objectives
 - Reduction of risks to human health
 - Reduction of risks to the environment
 - Elimination/minimization of long-term downstream transport of PCBs and control of sources of release to the river

- General Standards Specified in the Permit
 - Overall protection of human health and the environment
 - Control of Sources of Releases
 - Compliance with applicable or relevant and appropriate federal and state requirements (ARARs)

- Selection Decision Factors
 - Long-term reliability and effectiveness
 - Attainment of Interim Media Protection Goals (IMPGs)
 - Reduction of toxicity, mobility and volume of PCBs
 - Short-term effectiveness
 - Implementability
 - Cost

The full two-hour presentation is best summarized in the fact sheet and presentation slides, as noted above.

Questions and Comments on the CMS

Q: Will there be any remediation below the Connecticut state line?

A: Not beyond monitored natural recovery.

Q: Why is there a spike in some charts showing an increase in contaminants in fish over the time of remediation?

A: The model developed by EPA includes an extreme storm event, based on input data for the largest storm on record, as gauged at Coltsville, which was a hurricane in the mid-1930s. During storm events, backfill and/or thin-layer cap material can erode

Q: How long does geotextile capping material last?

A: No geotextile is included in the ROR alternatives. For upstream portions of the river where it has been used, it is expected to last in perpetuity.

Q: Will the fish above Woods Pond travel to Bulls Bridge?

A: Based on the data from GE monitoring of fish in CT over many years and life history information on the fish species present, GE does not believe that fish from the vicinity of Woods Pond will travel to Bulls Bridge. GE and CT DEP collect trout at Cornwall every 2 years and the PCB concentrations are normally around 2 ppm.

Comment: CT is starting to loosen its fish advisories based on the results of fish monitoring.

Q: What are fish monitoring plans for CT going forward?

A: Similar to the present program – 2 species at 4 locations. For the future, GE is assuming sampling every five years, rather than the current every two years, including fish, water column and sediment sampling.

Q: What does 10^{-6} cancer risk mean?

A: It is a one in a million chance of cancer

Comment: Regarding cancer risk, there are probably a lot of people not in the statistics. Perhaps blood serum levels should be checked for PCBs along the Housatonic.

Q: What do you mean by wetland removal?

A: Removing and replanting back to the original grade.

Comment: GE should consider floodplain elevation changes due to development and landfill.

Q: Truck trips are used to worry us about traffic impacts. Why not consider using railroads to remove contaminated soil?

A: GE needed to make some assumptions for the calculations in the CMS. The railroad is not owned by GE. If asked to investigate use of railroad by EPA, GE could consider that as a possible strategy.

Q: Are all figures presented tonight in the CMS document?

A: Vast majority of figures, yes, and will post the presentation. CDs containing the full document are available tonight for those who want them.

Q: Some evaluation criteria we expected are not included, especially community acceptance.

A: Community acceptance is not a requirement of the RCRA permit. However, the purpose of the presentation tonight and the ongoing informal comment process on the CMS is to gather community input, reactions, and ideas.

Q: Can you elaborate on capping, what type of sand, what size, etc.?

A: The sand specifications would be developed in the later design phase of the project. We've made assumptions about total organic carbon and armor stone. For the Thin Layer Cap (TLC) material, grain size was assumed to be the same material as what occurs in the location being capped. TLC is designed to enhance natural recovery; it is not designed to hold PCBs in perpetuity.

Comment: This CMS is the last shot for CT to advocate for remediation in the river in CT. CT has been wiped off map by GE, CT and EPA. Write to EPA and in your comments on this CMS, ask why GE is not coming to CT to remove sediments, especially behind dams. Also request that GE abbreviate this presentation next time, as they went over the allotted time this evening.

Q: What is the half-life of PCBs? How does it effect the remediation?

A: It is very long, perhaps longer than 75 years. PCBs are very stable.

Q: Can you comment on the hot spots for PCBs behind dams?

A: GE and EPA have collected data in CT. Data is consistent, and shows no hot spots, with average concentrations very low, typically not detectable, with a few concentrations of 1 or 2 ppm.

Q: Are there any other sites this large in the country that have been cleaned up?

A: No site of this size has been completed to date. Remediation of contaminated sediment is underway in the Fox River, the Hudson River, in Commencement Bay, and in the Grass River, which is similar in size to the Housatonic and numerous other sites.

Presentation on the EPA Review Process

Susan Svirsky, EPA Project Manager for the Rest of River, presented an overview of the process EPA will use to review and approve or disapprove GE's CMS. The steps include:

- An informal public comment period starting on March 22, 2008.¹
- After review of GE's submittal and receipt of the public input, EPA can: approve the GE proposed plan, conditionally approve it, or disapprove it.
- If EPA conditionally approves the CMS, GE will need to revise the CMS to meet EPA's conditions and/or requirements. If EPA disapproves the CMS, then GE must address the deficiencies or EPA will make its own modifications to the CMS.
- EPA will develop the Agency's preferred remedial alternative or set of alternatives based on the information provided in the CMS. This Preferred Alternative will undergo regional and national EPA review for consistency with remedies implemented or proposed for other hazardous waste sites and the degree of achievement of the criteria.
- After these reviews, EPA will propose the Preferred Alternative for formal public comment as a draft modification to the RCRA Permit. Following closure of the public comment period, EPA will consider the comments received and issue a final decision and a Responsiveness Summary addressing the comments received.
- Prior to the issuance of EPA's final remedy decision, GE has the right to invoke administrative dispute resolution.
- The final cleanup decision is subject to appeal by GE and the public to EPA's Environmental Appeals Board (EAB) and subsequently the US Court of Appeals. During appeals, there are provisions for design of the remedy to take place as the appeals progress.
- Upon completion of all appeals, GE is required to implement and pay for the remedial action under the Consent Decree.

Questions and Comments re: EPA Review Process

Q: What is the potential schedule for EPA's preferred alternative?

A: We are hoping to be able to announce something in the fall/winter 2008, but that is probably the best-case estimate.

Q: When EPA reviews and decides what alternatives there will be, can EPA mix and match among the alternative elements?

A: Yes

¹ The informal public comment period was extended to May 20, 2008 after the CCC meeting.

**EPA-GE Housatonic Project Citizens Coordinating Council
Attendance 3-26-08**

Name	Organization
<i>CCC Members</i>	
Michael Carroll	GE
Lynn Fowler	Housatonic River Commission
Tim Gray	Housatonic River Initiative
Judy Herkimer	Housatonic Environmental Action League
Charles Kilson	Schaghticoke Tribal Nation
Dan McGuinness	NW CT Council of Governments
Susan Peterson	CT Department of Environmental Protection
Andy Silfer	GE
Susan Svirsky	U.S. EPA
Dean Tagliaferro	U.S EPA
<i>Public</i>	
Rod McLaren	GE
Joan Gerhardt	GE
Peter O'Toole	GE
Ed Wilder	
Robert Cuthriell	John Adams Associates
John Krob	BioGenesis Enterprises
Jess Klingebiel	Housatonic River Commission
Sharee Rusnak	CT Dept. Public Health
Dennis DePaul	Kent Conservation Commission
Ryan Snyder	Reporter
Priscilla Hart Mavis	Housatonic River Comm. Secr.
Kim Herkimer	Housatonic Environmental Action League
Barbara Barrett	
Ingrid (illegible)	

Name	Organization
Jill (illegible)	
Jack Dew	Berkshire Eagle
Scott Campbell	Weston Solutions
Dick McGrath	SHD, Inc.
Rich DiNitto	SHD, Inc.
Joe Velky	Schaghticoke
Peter DeFur	Housatonic Restoration Initiative Consultant
Bart Clark	Oakwood Environmental Associates
Paula Ballentine	U.S. EPA
Tim Conway	U.S. EPA
Nancy Jackson	
Jack Murphy	
Wendy Murphy	Kent Conservation Commission
Joe S (illegible)	Kent Conservation Commission
John Sontag	BioGenesis Enterprises
Jennifer Gunther	Housatonic Valley Association
Elaine LaBella	Housatonic Valley Association
John & Charlotte Frost	
Karen Chase	Kent Goodtimes Dispatch
Chuck Harman	AMEC
Kevin Russell	QEA
Kevin Mooney	GE
Mark Gravelding	ARCADIS
Stuart Messuer	ARCADIS
Barbara Culver	