EPA-GE Citizen Coordinating Council
September 13, 2006 Meeting
DRAFT 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. They noted that this meeting would kick off the 2006-2007 CCC schedule.

Update on 2006 Remediation Work

Dean Tagliaferro provided an update on the status of remediation work in Pittsfield. He presented a map showing the status of the remediation progress, which is available on the web site for the project and was distributed to CCC members after the meeting. The map is also attached to this summary.

Update on work on the river

- EPA completed remediation of the mile and one-half project in spring and is currently completing restoration activities, including tree planting at Fred Garner park;
- GE completed remediation of 36 properties and floodplains adjacent to the mile and one-half; all residential properties have also been restored. There are four recreational properties for which GE is completing restoration and, ideally, work will be completed by October.

Update on Oxbows and Site Proper

- Work has been completed in several soil action areas throughout site
- Two additional areas are in the planning stages for work in the coming year
- Newell Street 1 and 2 are completed
- Oxbows [including Oxbows J&K, A&C, and Lyman Street Commercial properties) are 98% completed and GE is in the process of backfilling and planting trees, and performing final paving
- Restoration of the GE-owned Lyman Street parking lot should be addressed in spring 2007. The area is currently being used as a staging area.
- Unkamet Brook area still in the investigation phase

Note: See the attached press release for more details on the remediation activities performed this year.

Questions and Answers on River Update

Q. When you say fully remediated and restored, are the PCBs gone from that parcel?
A. It means the remediation meets the performance standards outlined in the Consent Decree.

Q. Is there any investigation planning going on to the east of what is on the map?

A. The investigations by EPA and GE are shown on the map. Areas east of the site not covered by the consent decree may be subject to investigation and cleanup under state jurisdiction.

Q. Prior to remediation there was a pumping station at the Newell II site. Is it back in action?
A. The NAPL pumping was reactivated the last day of August and enhanced 6" wells are now pumping out DNAPL or PCB oil.

Q. We were told long ago that there is not a lot of product there, so why are we sinking more wells rather than decommissioning the one well? Why are we installing new wells?

A. That site has over four feet of product, which is not an insignificant amount, although it is well contained by the clay bowl structure of the site. New wells were installed because the existing 2" monitoring wells would have been destroyed during construction, so we took advantage of the opportunity and put in 6" wells to enhance the NAPL recovery efforts.

Q. Regarding the Lyman Street parking lot, former GE workers told us there are things buried way down, including barrels. Under the CD, how long are we going to be monitoring the banks along these sites?

A. At this time there is no end date for the monitoring efforts.

Comment by CCC member: Even though folks are conversant with the terminology, I need to clarify that "100% remediation" doesn't mean in anyway that the PCBs have been removed and now its clean ground, but that all work has been done as defined by the Consent Decree. In fact an enormous amount of PCBs have been left in place in the ground, including high levels of PCBs which are being covered up.

Update on On-Plant Consolidation Areas (OPCAs):

Along with cleanups, there are continued operations at the two OPCAs:

- Building 71 is currently at its capacity and last year GE capped about 2.8 acres of the total 5.6 acres, leaving about 2.8 acres still needing to be capped. This is currently underway and will be completed either this fall in or in early spring. If additional spaces needing fill are identified in this capping process, additional material will be added. After the capping is complete, the Building 71 OPCA will have no further activity.
- The Building 78 OPCA is not at capacity. The current schedule calls for it to reach capacity in 2008. When the capping of Building 71 is completed, there is a substantial portion of Building 78 that can receive its final cap, so that about 50% of Hill 78 should be capped next year.
- Because Building 78 is a highly visible project, EPA, in response to requests from the community, has increased the frequency of the monitoring at the Allendale School, and will continue to monitor the air there twice a week through September. Also, there is full time EPA oversight at the OPCA when GE is either placing waste or undertaking capping operations. Air monitoring is updated and posted weekly on the project web site, and the schedule of upcoming OPCA activities is sent out weekly.

Questions regarding OPCAs

Q. How deep is the sand layer in the Building 71 cap?
A. Its purpose is to make the surface smooth so that the liner doesn't get punctured. The thickness is 1 -3 inches, which is enough for this purpose.

Comment by CCC member: For point of terminology, the waste products in 71 are not simply waste products, but superfund level highly toxic PCB waste, in the middle of Pittsfield, allowed by the terms of the CD.

Q. What happens when you are remediating adjacent to a completed area? What do you do to check the completed sections?
A. We monitor the one being cleaned for migration and inspect everything at the end.

Q. What have been the results of the air monitoring at Allendale School?
A. There have been no exceedances of the action level at the school, even at the lower action level established for this site.

Comment: Results of a round of sampling conducted by the DPH at the Allendale School will be posted sometime soon, perhaps on the DPH website.

Q. What percent of Hill 78 is available to accept additional waste?
A. The volume remaining to be filled is about 20%. The 50% figure refers to what may be capped next year.

Q. There was some recontamination found in the half-mile area last year. What testing is being done downstream from the half-mile?
A. Surface water is sampled monthly for 5 years up and downstream. We have found trace levels at Lyman St. and primarily non-detect at Newell St. Sediment testing is scheduled for every 5 years. Sediment testing in the ½-Mile Reach is scheduled for August 2007.

Q. How many other pumping wells are there in addition to Newell Street throughout the plant areas and elsewhere?
A. There are a fair number of wells with automated pumping of product, several of which extract oil and groundwater. Most of these are in the East Street area. There are three continuous pumps on Lyman St. In several areas GE manually removes product on a regular basis, mainly in the East Street area.

Q. Do any wells pump at Unkamet Brook or the GE facility between East St. and Dalton.
A. Yes. There are manual wells there.
DEP: Monitoring wells exist outside the areas of the CD, but none are designed to recover product.

Q. When will Unkamet Brook be addressed?
A. That portion of the site is still in the investigative stage, and will probably be a later action area to address. We don't expect any work there for at least a few years.

Q. We have heard reports of PCBs showing up in sump pumps of homes north of area 4A. Is EPA or DEP in charge of this?

A. This is a state lead. GE looked at sump pumps in about 30 residential properties in the East Street area. Sampling showed four sumps with PCBs greater than 2ppm (one was 4 ppm) and we are going to clean those sumps out. Also, one of these properties had some soil removed.

Q. Will there be periodic monitoring of the sump pumps?
A. There are a series of monitoring wells in the area that are part of the Groundwater Management Area covered by the CD. These will continue to be monitored and if there's something there it will show up in the monitoring wells.

Q. When you pull out the contents of the sump pumps, were you looking at water or residue or sediment in the filter? 4 ppm isn't huge in sediment, but it is huge in water.
A. It was sediment that was tested in all of the sumps.

Q. To provide context for new people, could you review the threshold levels of PCBs that require a response action to be taken for residential and recreational areas?
A. The clean up standard for residential property is an average of 2ppm PCBs in the surface, and if there are any exceedences above 10 ppm in the surface, remediation must occur, regardless of the average. For recreational property, the standard is 10 ppm on the surface on average and a not to exceed 50 ppm in any discreet concentration, regardless of average. The commercial standard is 25 ppm on average and a maximum of 125 ppm in any one spot requires remediation. There are additional requirements at depth.

Q. In the neighborhood bordered by East and Newell streets (Milan street neighborhood) there were at one time monitoring wells in back yards. What is the status of these wells?
A. There are 2 or 3 monitoring wells there very close to the river, which are still being monitored, but we have found no product in these wells. This is a groundwater management area associated with the consent decree.

Q. Does any one know the status of the NPDES permit? Isn't it extraordinary for the process to go on so long?
A. EPA is still reviewing comments and the response to comments is under internal review.

Update on Plans for the Coming Year

Dean described the remediation work that will be ongoing in the coming year. The Silver Lake pilot project begins this year (see the presentation description below) and the Rest of River .process continues. On the Rest of River, the peer review of the Model Validation Report occurred this past summer and EPA is preparing a Responsiveness Summary addressing the comments received from the Panel. The Responsiveness Summary should be issued in late October/early November. This triggers the requirement for GE's submittal of the Corrective Measures Study (CMS) Proposal 90 days after the Responsiveness Summary comes out.

EPA expects to finish most of the remaining field work on the mile and one-half, including restoration, by Thanksgiving.

No significant construction activity will begin at the Site again until March 2007.

Dean also announced some staffing changes. Bill Lovely and Sharon Hayes will be on the project through Oct. 1st after which they are moving into new positions at EPA.

Review of Proposed CCC Schedule & Topics

Suzanne Orenstein reviewed the CCC schedule for the 2006-2007 year. She noted that the primary focus for the year would be on the Rest of River milestones and documents, and that the meetings would be scheduled to coincide with release dates for those documents. A copy of the schedule as revised in the meeting is attached.

The following questions and comments arose during the scheduling discussion.

Q. Could you give us an idea of the public process after the Corrective Measures Study proposal hits the streets?
A. The only formal process is the public comment period that begins when EPA releases the Statement of Basis for comment. The Statement of Basis will set forth EPA's proposed remedy for the Rest of River. EPA is considering an informal public comment period on both GE's CMS proposal and GE's CMS submittal. Both informal comment periods would include presentations by GE. (The attached flow chart for the remedy selection process for the Rest of River should clarify the schedule and opportunity for formal and informal comments).

Q. Would comments submitted in that process become part of the record?
A. Yes. The process is informal in that we're choosing to do this rather than being required to do it. All comments will become part of the record.

Q. Are you able to provide an electronic version of a flow chart with the entire Rest of River process so that we can start getting it out to people so that they can understand what to expect and when they can plug in input and to whom?
A. We can put together something that reflects the sequencing of things, though we might not be able to put an actual date to it. Will get something for Suzanne to distribute.

Comment: Sometime in mid-November, HRI will sponsor a symposium on remedial technologies with a number of vendors and experts who will talk about options for true remediation instead of landfilling as this process moves downriver. This was originally scheduled as a CCC event, but HRI decided with permission of EPA to do this as a sidebar event. All are invited to attend. More specific information will be available shortly.

A member asked why the CCC meeting was being held in a hotel rather than a municipal or public venue. From a public participation and environmental justice standpoint, people in neighborhoods who might be affected by the project don't like to come to these kinds of settings. They prefer libraries, public venues, and neighborhood schools. The member requested that whenever possible, the CCC meet in a municipal or public setting. Suzanne Orenstein, the facilitator, explained that the hotel became necessary because the usual public meeting place at the Library was reserved for several months by the Barrington Stage Company.

Additional Updates

Sue Steenstrup of DEP provided an update to comments at the last meeting, in which CCC members had expressed an interest in DEP's action on the King Street Dump. That project is being managed by DEP's Office of Solid Waste, which will issue a provisional approval letter tomorrow. The letter addresses the capping proposal for the dump site and will be open for public comment for 21 days. Sue suggested CCC members contact Larry Hansen at DEP to obtain a copy of the letter. She also noted that the Office of Solid Waste is willing to arrange a meeting in Springfield with those who are concerned after the public comment period is over.

Questions for DEP

Q. What is the status of the plan for Dorothy Amos Park?
A. As you know, we presented information about GE's proposal at a CCC meeting in the spring. DEP is about to issue a letter in the next week or two on GE's proposal and will receive a refined proposal from GE after that.

In response to a question from a member who was contacted by a homeowner who has a hot spot on his property, DEP asked that the homeowner recontact DEP for clarification of their letter to him.

Update on Inauguration of Silver Lake Pilot Study

Andy Silfer, from GE presented an overview of the pilot study that is getting underway this fall at Silver Lake. A copy of the presentation slides are posted at www.epa.gov/ne/ge. Andy reminded the CCC that last year GE and its contractors completed a Bench-Scale study of how the lake bed might respond during a capping process. EPA approved the workplan for an in situ Pilot Study in August 2006, and the presentation today outlines the plans for the Pilot Study.

The pilot study will involve placing capping material in three contiguous areas in a one-acre portion of the site on the eastern edge of the lake. Each of the three areas is approximately 40 feet wide by 100 feet long and three different capping approaches will be tested. The area selected for the pilot is one that has fairly high levels of contamination, and it has relatively steep slope to the lake bed that allows for testing under such placement conditions.

The Pilot Study has the following objectives:

- Evaluate the selected method for placing cap material in thin lifts;
- Evaluate the response of in-situ sediments to cap material and armor stone placement;
- Evaluate the constructability of employing geotextile in cap configuration;
- Assess the potential for mixing as a result of cap placement; and
- Assess the potential water quality impacts during cap placement.

The pilot study installation will be completed in November, with additional core sampling six months later, in May, 2007. The report of the pilot results is expected to be submitted in September, 2007.

Questions about the Silver Lake Pilot Study

Q. Is there a substantial weight to geotextile material?
A. The challenge is getting the cap material to sink down to the bottom; one of the methods has cap material sandwiched between two layers of geotextile, which may help it to sink to the bottom.

Q. Are these three pilots going to happen simultaneously? How do you evaluate them?
A. The cap will be placed along all three study areas at the same time. Their being next to each other does not impact our ability to evaluate the capping pilots. We will be taking core samples from each area.

Q. What prevents areas from merging a bit?
A. They may merge, but we'll monitor that. That should not affect the usefulness of the study.

Q. Does the capping extend above the water line onto the bank?
A. Yes. It will go a few feet up onto the bank to protect the bank from wave action.

Q. Are there plants along the banks that will need replacing?
A. No, but the natural resource trustees have resources as part of the settlement for restoration work there.

Q. Is there an intent to use activated carbon as part of the cap?
A. The plan is to have total organic carbon of 0.5% in the isolation layer. That is not activated carbon, but total organic carbon plays a similar role. The sand and topsoil blended together in the cap should give us a total organic carbon of 1%.

Comment: Some of us are disappointed in extent of the pilot project because it doesn't stretch creativity and we wanted something more adventurous. Even if you accept capping, experts have had experience using activated carbon in a capping environment to render the PCBs unavailable. That seems uniquely suited to a lake remediation. Did GE and EPA rigorously investigate use of activated carbon? This seems like a good opportunity instead of just dumping soil there – it seems like a wasted opportunity.

Q. How far down [below water] is the armored layer?
A. 2.8 vertical feet for the east/west sides of the pond. The north/south sides won't go as high. The height specification is based on the waves and the distance they are able to travel.

Q. What are the highest PCB concentrations in the lake?
A. Relatively high contaminant areas are included in the 400 cubic foot area that will be excavated as part of a removal action. The levels there are about 1,000 - 2,000 ppm PCBs. The highest levels in the rest of the lake are about 1,000 ppm PCBs.

Q. Does the WMECO property have any high tension wires?
A. There are no high tension wires in our staging area, although there are some near the site. It is an open area where they stored equipment.

Q. Will the anchoring of the armor on the bank would take up space on nearby commercial and residential properties?
A. Yes, but we haven't fully designed this. The perimeter needs some sort of armoring and nearby properties have bank soil removals planned too.

Q. What is the overall acreage of the lake?
A. 26 acres.

Q. What about inflow monitoring, and incoming outfall pipes?
A. Some outfall pipes come into the lake and one of them is monitored. One outfall pipe is being monitored under NPDES.

Q. Are there any other projects like this in the US?
A. There are others, but none exactly like this.
EPA: This is a standard technique that is done in other places. It is not experimental. In other large lakes this approach is in the planning stages, including Onondaga Lake in NY, which is about 4000 acres.

Comment: Long ago we heard rumors about missiles being tested in the lake and that munitions were dumped in the lake. In the interest of safety, keep this in mind.
Response: A side scan sonar was conducted as part of mapping the lake and we did not find anything like that.

Q. After the pilot is completed, are you pulling it up and redoing it as part of the final plan?
A. Because we are not going to core through the geotextile material, the cap can stay in place.

Q. How will you deal with underground springs?
A: We are not aware of any underground springs. Our understanding is that the lake is fed by groundwater but not springs.

Q. With the 12 inch isolation layer, will you be able to look at bioturbation.
A. We don't plan to do so, but we understand that 6 inches are needed for bioturbation, so we specified 12 inches to allow for it.

Action Items

- Provide copy of map showing status of remediation projects (distributed to CCC on Sept. 18).
- Provide a flow chart of steps in the Rest of River project, identifying opportunities for public comment.

Public Comments

Charlie Cianfarini publicly thanked Teah Quinn from Senator Nucifero's office for her work with the CCC, and he thanked Senator Nucifero for supporting the remediation project. As Senator Nucifero is retiring, this was Teah Quinn's last CCC meeting.

CCC Operating Procedures

The CCC reviewed its operating procedures, which had been accepted in September 2005, and made no changes for the coming year.

Next Steps

Suzanne Orenstein and Dean Tagliaferro briefly discussed plans for the tour of the 2006 remediation projects scheduled for October 11 at 4 PM. They promised to send details about the meeting place for the tour by email in the near future. (Details were sent to the CCC on September 25th).

The meeting adjourned at 7:30 PM.

CCC Attendance: September 13, 2006

Name	Organization	Email Address	Attended
Members			
Thelma Barzottini	Citizens for PCB Removal		X
Barbara Cianfarini	Citizens for PCB Removal	bcianfar@hotmail.com	X
Michael Carroll	GE	Michael.carroll@corporate.ge.com	X
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Dick McGrath	SHD, Inc.		X
Mike Hassett	BBL		X

2006-2007 Schedule for CCC
(as revised at of 9-13-06 meeting)

September 13	CCC kickoff meeting
October 11 (4PM)	Tour of completed remediation projects
November	CT Meeting re: 2006 work and Rest of River schedule
February (two meetings)	Corrective Measures Study Proposal plus CT meeting re: Corrective Measures Study Proposal
April 13	Restoration Methods and Options Workshop
Summer 2007 (two meetings)	Corrective Measures Study plus CT meeting re: Corrective Measures Study

All meetings from 5:30 to 7:30 PM, except for October 11.

Deleted: November[1] . . . CT Meeting re: 2006 work and Rest of River schedule¶