

EPA-GE Citizen Coordinating Council Optional Meeting – December 14, 2005

Highlights

Allendale School

EPA described the results of its soil and air sampling, as follows:

- Soil sampling for the playground showed no contamination that would make the playground unsafe. Twenty samples were taken; eighteen showed non-detection of PCBs, and two samples showed 0.07 and 0.06 ppm of PCBs. The action level for PCBs in soil is 2 ppm.
- Three air monitors were placed on the Allendale School playground. Two were in the same location to provide redundancy; all were in the rear of the school (the side of the school facing the Hill 78 and Building 71 On-Plant Consolidation Areas (OPCAs)). The air samples were collected over a 24-hour period during the week of December 5 and showed only minimal traces of PCBs in the air at the school, far below levels that would trigger EPA concerns about the health of children or the public at large. EPA will continue to sample weekly when there is activity at the OPCAs, and monthly when there is no activity.

MA DEP reported that it's sampling of the crawl space under the school would be completed by Christmas. This sampling requires precautions for a confined space entry, and DEP has contracted with a sampling contractor qualified for that circumstance.

MA DEP contacted the MA Dept. of Public Health to encourage them to attend this meeting. DPH representatives noted they were willing to meet with the community at some future point, and that questions and comments about the DPH sampling inside the school could be directed to Elaine Krueger at 617/624-5757. DPH will also work with the Pittsfield Board of Health to address questions about the sampling they did.

Several parents and teachers from Allendale School attended this meeting and raised questions about the sampling methods and results.

- Members of the public advocated for weekly air sampling, even when no work was proceeding at the OPCAs. Teachers asked for information about potential activities at the OPCAs on a weekly basis, and EPA agreed to provide that info.
- There were questions about whether citizen groups could conduct their own monitoring. DEP and EPA reminded those interested that there are established quality assurance and control methods that any monitoring must meet in order to be convincing to government authorities and the public. EPA and DEP also stated that those interested in sampling would need to get permission from the affected property owner. For Allendale School, the City must grant access to the school property for any testing.
- CCC members and teachers asked GE and EPA what it would take to move the Hill 78 OPCA or the Allendale School. The response was that the data do not show the need to take those actions and that those options would be considered only if and when there were data showing that there is a contamination problem at the school.

On-Plant Consolidation Areas (OPCAs)

GE proposed enhancing operational procedures at the OPCAs. The list of changes is attached. GE explained that, notwithstanding its view that previous practices were sufficient, it was enhancing its operations in an effort to address concerns of teachers and parents at Allendale School.

Many questions were raised about the contents and characterization of Hill 78, and the state of ground water, surface water, and storm water drainage from the site. Some CCC members expressed continuing concern about recontamination of the river from storm water run off and groundwater flow. EPA responded that the Hill 78 was sufficiently characterized prior to when the remedy was agreed upon as part of the consent decree. In response to questions, EPA will provide a list of documents that characterize the Hill 78 area. Also, there is an ongoing investigation of the structural integrity of the city sanitary sewer pipes and storm drain lines that run under Hill 78.

Newell St. II

EPA provided an update on the status of the drum investigations and removal actions at the Newell St. II site. They showed a map (posted on the EPA web site) that shows that drums were found in the trench pit studies in locations consistent with the results of the geophysical investigation. EPA and GE have identified an area where more extensive removal of drums, capacitors and soil than the consent decree required will occur. In those locations, removal activities will generally extend to an approximate depth of six feet or more, rather than the 3 feet anticipated by the consent decree. The actual limits of this additional excavation and drum removal will be determined in the field based on the observed vertical and horizontal extent of the drums. GE will do the removal work, and materials removed (soil, drums, capacitors, etc.) will be disposed off-site, not at the OPCAs.

Interim Media Protection Goals (IMPG)

CCC members expressed their support for EPA's disapproval of GE's IMPG proposal. The letter of disapproval and the document outlining EPA's comments are posted on the web site. A revised plan is expected from GE in approximately 30 days.

Additional Questions

As the meeting adjourned, some additional questions arose for which there was not time to respond. The facilitator suggested that the CCC develop a process for responding to questions, including those that arise between meetings.

Action Items

- Identify sources of information about the contents of Hill 78 (EPA)
- Provide list of OPCA operational improvements (GE)
- Provide QA/QC requires for soil and air sampling to HRI (DEP)
- Post a map of Newell St. test pit results on EPA's web page.
- Contact Allendale School representatives with weekly schedule of Hill 78 activities (EPA)