

Presentation to Pittsfield City Council  
H & S Subcommittee

Allendale School and GE Building 71/Hill 78  
On Plant Consolidation Areas  
Update

April 27, 2023

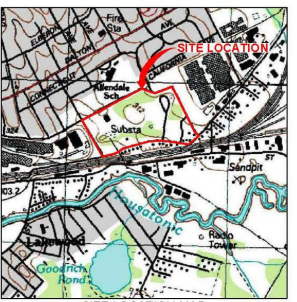
# Background

- Allendale School remediation - 1999 (w/minor additional work in 2007/2008).
- Placement of material in Hill 78 and Building 71 on-plant consolidation areas (OPCAs) was initiated in 2000/2001.
- Materials prohibited from disposal in the OPCAs included: free liquids, free product, intact drums and capacitors, other equipment that contained PCBs within its internal components, and asbestos.

# Background

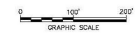
- The Building 71 OPCA was a newly constructed lined landfill designed to accept TSCA PCB and hazardous waste and was closed and capped in 2006.
- The Hill 78 OPCA was a pre-existing un-lined landfill from the 1940's which accepted additional low-level Non-TSCA PCB and non-hazardous materials and was closed and capped in 2009.
- A long-term inspection, monitoring and maintenance plan was memorialized in GE's 2011 OPCA Final Completion Report (plan incorporates review and comment from Pittsfield Health Department).

CITY OF PITTSFIELD, MASSACHUSETTS  
 DIVISION OF ENVIRONMENTAL SERVICES  
 PROJECT NAME: OPCA POST-CLOSURE GROUNDWATER MONITORING PROGRAM  
 PROJECT NUMBER: 31020022  
 DATE: 03/20/2013



- LEGEND:**
- EXISTING BUILDING OR STRUCTURE
  - EXISTING ROADS
  - ACCESS ROAD
  - NON-TSCA/NON-RCRA AREA
  - TSCA/RCRA AREA
  - LIMIT OF CONSOLIDATED MATERIALS
  - EXISTING SECURITY FENCE
  - BOUNDARY OF BUILDING 71 AND HILL 78 ON-PLANT CONSOLIDATION AREAS REMOVAL ACTION AREAS
  - BOUNDARY OF HILL 78 AREA - REMAINDER REMOVAL ACTION AREA
  - K11-7-2 TAX PARCEL ID
  - TAX PARCEL BOUNDARY

- NOTES:**
1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. - FLOWN IN APRIL 1985. DATA PROVIDED BY GENERAL ELECTRIC COMPANY, AND BLAISLAND, BOUCK & LEE, INC. (BBL) CONSTRUCTION PLANS, AND ON OBSERVATIONS DURING A SITE VISIT BY BBL PERSONNEL ON DECEMBER 3, 1997. SOIL RELOCATION FEATURES ARE BASED ON FIELD SURVEY INFORMATION OBTAINED BY SK DESIGN GROUP, INC. ON APRIL 15, 2009.
  2. SITE BOUNDARIES ARE APPROXIMATE.
  3. NOT ALL PHYSICAL FEATURES SHOWN.



GENERAL ELECTRIC COMPANY PITTSFIELD, MASSACHUSETTS <b>OPCA POST-CLOSURE GROUNDWATER          MONITORING PROGRAM</b>	
<b>ON-PLANT CONSOLIDATION AREAS          SITE PLAN</b>	
	FIGURE <b>1</b>

# Monitoring Requirements

- OPCAs (GE Performs)
  - Physical integrity of cap system (including cover, drainage and leachate components)
  - Groundwater monitoring
  - PCB Air Sampling
- Allendale School (EPA performs)
  - PCB air sampling 2 x per year

# Physical Integrity Monitoring

Inspections 2 x per year, consisting of:

- Evidence of erosion of the soil cover
- Vegetation on the soil cover
- Tree plantings
- Uneven settlement
- Damage to the geosynthetic cap/liner components
- Obstructions/blockages of drainage layers and outlet pipes
- Leachate handling and collection system
- Integrity of perimeter fencing

# Integrity Monitoring Results

Repair items GE has performed in the last two years:

- Repair erosion of topsoil
- Install new surficial drainage pipes
- Fill woodchuck burrows and re-seed bare spots

# Groundwater Monitoring

- Sample 12 wells that surround the OPCAs 2 x /yr (spring & fall) for a minimum of 30 years.
- Analyze samples for an extensive list of chemicals.
- Currently sample 4 additional wells downgradient of the OPCAs as part of GMA-4 program for volatile organic compounds (VOCs) as necessary.
- Sample industrial supply well for PCBs and VOCs.
- Monitor direction of groundwater flow.





## Monitoring Wells near Allendale School

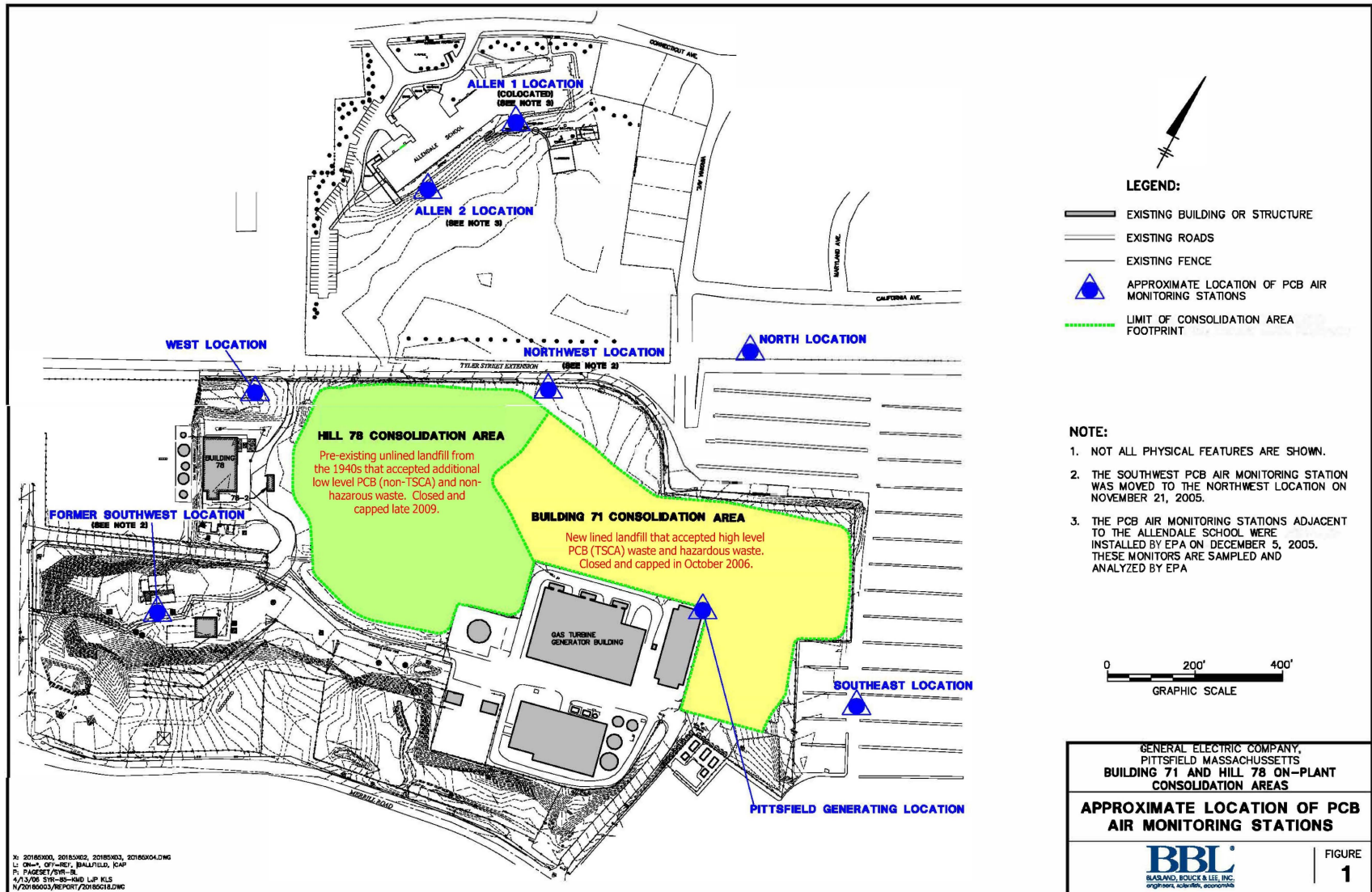
- Flow is south, towards the Housatonic River, and away from Allendale School
- There are three wells between Allendale School and the OPCAs.
- In the last 48 months, all three wells were non-detect (ND) for PCE, TCE and PCBs; and there has been no Performance Standard exceedances of any constituent.

# Groundwater Summary

- For all OPCA monitoring wells, monitoring continues to show no threat to occupants of existing buildings (GW-2 Standard) or surface water (GW-3 Std); and there are no drinking water wells in the area (GW-1 Std)

# PCB Air Monitoring

- GE conducts sampling at five locations on GE property two times per year (July and September)
- EPA conducts sampling at two locations on Allendale School property concurrent to GE's sampling
- Sampling to continue until GE requests, and the Agencies concur, that sampling is no longer necessary



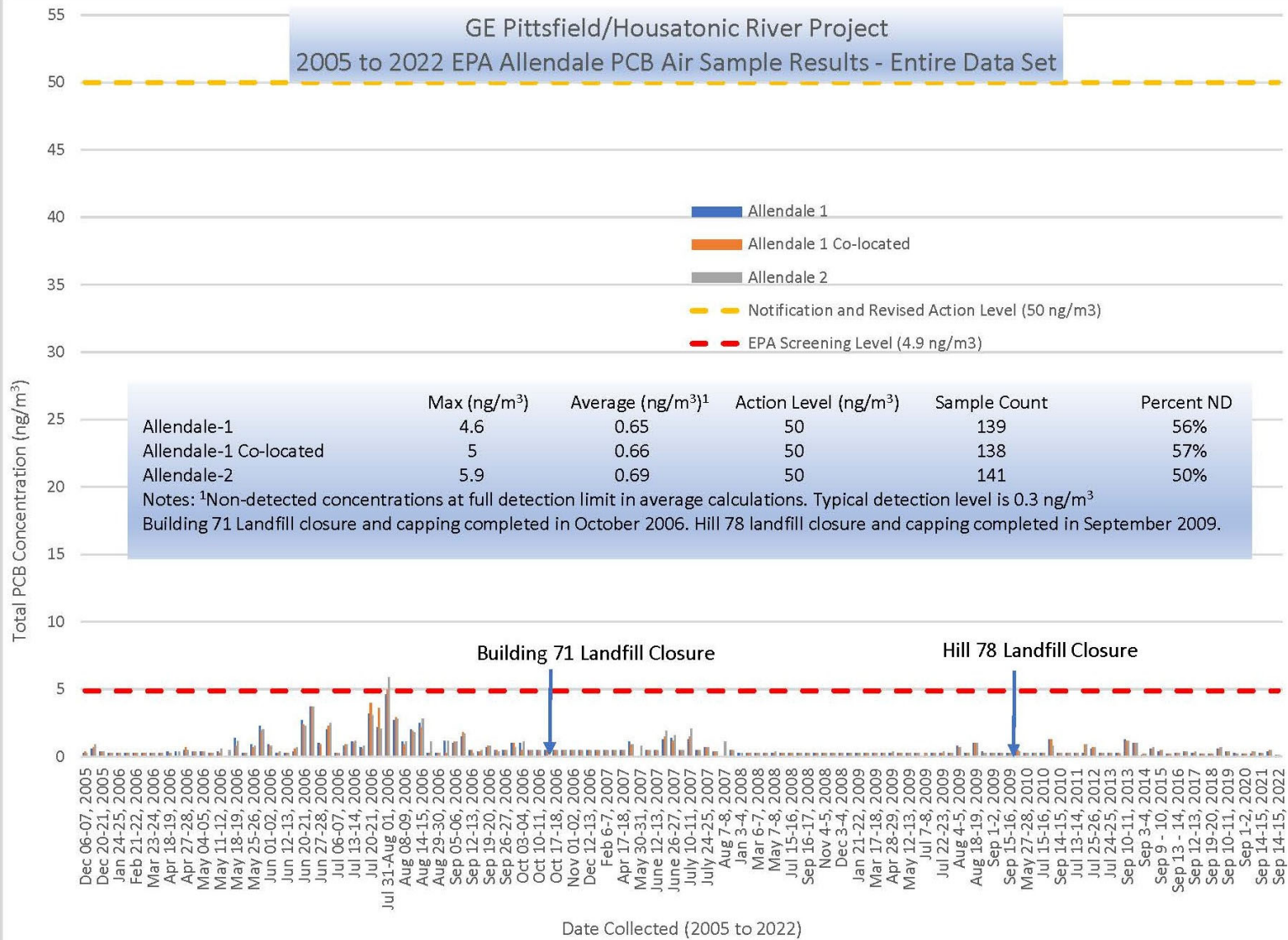
**GE–Pittsfield/Housatonic River Site  
2020, 2021 and 2022 EPA Allendale School PCB Air Sample Results**

Collection Date	Total PCB Concentration	Total PCB Concentration	Total PCB Concentration	Temperature Range ° F	Validation Status
	( $\mu\text{g}/\text{m}^3$ )	( $\mu\text{g}/\text{m}^3$ )	( $\mu\text{g}/\text{m}^3$ )		
	Allen 1	Allen 1 Co-location	Allen 2		
July 12-13, 2022	0.0004	0.0005	0.0005	57.6 - 86.3	Tier II
September 14-15, 2022	0.0001 J	0.0001 J	0.0001 J	52.3 - 73.9	Tier II
July 20-21, 2021	0.0002 J	0.0004	0.0004	61.7 - 83.7	Tier II
September 14-15, 2021	0.0003 J	0.0003 J	0.0003 J	51.7 - 73.9	Tier II
July 15-16, 2020	0.0003 J	0.0002 J	0.0002 J	60.5 - 81.0	Tier II
September 1-2, 2020	0.0002 J	0.0002 J	0.0002 J	57.7 - 75.5	Tier II
Revised Action Level ( $\text{ug}/\text{m}^3$ )	0.0500	0.0500	0.0500		
Original Action Level ( $\text{ug}/\text{m}^3$ )	0.1000	0.1000	0.1000		
EPA Screening Level ( $\text{ug}/\text{m}^3$ )*	0.0049	0.0049	0.0049		

\*The screening levels (SLs) presented on this site are developed using risk assessment guidance from the EPA Superfund program and can be used for Superfund sites. They are risk-based concentrations derived from standardized equations combining exposure information assumptions with EPA toxicity data. SLs are considered by the Agency to be protective for humans (including sensitive groups) over a lifetime; however, SLs are not always applicable to a particular site and do not address non-human health endpoints, such as ecological impacts.

**2020-2022 PCB air levels 10 to 49 times lower than EPA’s conservative risk-based screening level for protection of human health and 100 to 500 times below the project-specific action level.**

## GE Pittsfield/Housatonic River Project 2005 to 2022 EPA Allendale PCB Air Sample Results - Entire Data Set



# Summary

- GE is conducting the long-term monitoring and maintenance program as required by Consent Decree and GE's Final Report.
- Program overseen by Federal EPA and Mass DEP, with support from Mass DPH.
- There are no significant issues and only routine maintenance and minor cap repairs have been required.
- To date, the data shows there is no health threat posed to Allendale School or the abutting neighborhood.