STATE OF NEW YORK COUNTY OF ST. LAWRENCE

204819

PUBLIC MEETING

GENERAL MOTORS CORPORATION

CENTRAL FOUNDRY DIVISION

SUPERFUND SITE

MASSENA, NEW YORK

APRIL 25, 1990

7:30 p.m.

STENOGRAPHIC TRANSCRIPT OF

PUBLIC MEETING held in the Village of Massena, on Wednesday, April 25, 1990, at 7:30 p.m. in the Town Hall, Massena, New York.

GMM 007 1875

RITA L. RICHER
JUSTICE COURT STENOGRAPHER
MASSENA, N.Y.

A P P E A R A N C E S

WELCOME
LILLIAN JOHNSON
Chief, Community Relations Staff
U.S. EPA, Region 2

OVERVIEW
GEORGE PAVLOU
Associate Director for New York Programs

PRESENTATION ON THE RESULTS OF THE
REMEDIAL INVESTIGATION AND FEASIBILITY
STUDY AND THE PROPOSED PLAN
LISA CARSON
Enforcement Project Manager for the
G.M. Massena Superfund Site

LILLIAN JOHNSON - My name is Lillian Johnson. I am talking to you tonight on behalf of the EPA.

Tonight, we are here to present the results of the Remedial Investigation and the Feasibility Study here for the GM Massena Site. We will also be discussing the proposed plan. As part of the Community Relations Program, we incur to you to participate in any part we are holding the meeting tonight. We also suggest that during the course of the public meeting which is a little bit later, we will ask you to stand up and state your questions of concern. But we want you to realize that this is not one of the formal hearings where we are asking people to make statements and for those of you that have prepared statements, we would suggest that you limit your time to about 3 to 5 minutes.

In an effort to keep you informed of our activities, back in around March 21st, we established a comment period which was from March 21st to May 21st to allow you an opportunity to go to the nearest repositories to review the sites and to comment. And your comments should come in the form of written comments to EPA or in form of the history tonight. However, we have extended the comment period to June 4th.

For those of you who are not aware, we established repositories in the area when the repository was established and investigations and the other repository is here in Massena at the Public Library and for the properties of the Remedial Investigations to review the studies of the proposed plans are located

at those repositories.

In addition to our public meeting here tonight, we are going to be available right here in this room tomorrow between 10:30 a.m. and 2:00. Now, what we are going to do tomorrow is have a more of an informal session, and is what we call a Public Availability Session. This is an opportunity for you to come in, sit down on a one and one or one on two, however you want to do it and discuss any aspect of the project with the EPA Representative. We will be here tomorrow in this room. I just want to emphasize it's a very informal process. You will not sit like that. As a matter of fact, you will be sitting at the table across from each other to discuss whatever areas you would like to discuss.

Now, tonight our presentation is going to be very short to allow you an opportunity to ask as many questions as you would like. But before we get into that, I would like very much to introduce to you the other EPA Representatives.

Now, George Pavlou, who is the Associate Director for New York Programs, is going to give you an overview of the Superfund Program and all the activities that occur here.

Lisa Carson who is the Project Manager on the Site is going to give you a presentation where she will go through detailed tests and results of the various studies at least here.

Many of you, I am sure, know Mel Hauptman who has been involved with the Site for a very, very long time. Mel is here tonight.

We have a few other people who will be assisting us in the profession of attorneys whose questions of attorneys that might come out and we would suggest to you, during the question and answer period, when you stand up to ask a question or read your statement or whatever, please give your name. It is a requirement that we record this particular meeting and so we do have the court stenographer here and she will need your name before making a statement. So before we get to that process, I would like to turn it over to George.

GEORGE PAVLOU - Good evening. As Captain of the EPA, I would also like to welcome you. I am very sorry about the fact that the microphones are not working, but please bear with us. We will try and speak as loud as possible.

First, I would like to thank the Town Officials and the residents of Massena for allowing us to use this hall for the public meeting.

Right now, on the screen, we are projecting the format of these public meetings. I will be making the introduction. Lisa Carson, after I finish making my comments, will describe the Site and what we are proposing for the cleanup of the G.M. Site and after her presentation, some brief statements will be made by the New York State Officials as well as the St. Regis Mohawk Tribe Representatives. And after that, we will open it up for public comments and questions.

The first thing that I would like to tell you is that this

is going to be the first of several public meetings that are designed to solicit your comments on our proposed plans. For the cleanup of the St. Lawrence River as well as the GM Massena Plant and the surrounding areas including the St. Regis Mohawk Tribe lands. Please bear in mind that EPA Regulations recognize that the Tribe is a sovereign state and require us that we apply their standards for any cleanups that we undertake on Akwesasne lands. The law is very specific in requiring EPA to apply the more stringent requirements be it State or Federal for Superfund Cleanups. I encourage you to review and comment on all of our documents.

Lillian Johnson mentioned where the repositories were. The public comment period began on March 21st, 1990 and will end on June 4th, 1990, including those two dates. Up to and including those two dates, we would be accepting your comments. All comments should be sent to Lisa Carson at 26 Federal Plaza. As Lillian mentioned, the public availability session will also be held tomorrow between 10:00 a.m. and 2 P.M. in this same room. She also mentioned that we are still in discussions with New York State and the Tribe with our proposed cleanup plan. Hopefully, we can resolve our differences before the end of the public comment period and allow us to select a remedy that is acceptable to all three governments. I should emphasize that EPA's Proposed Plan does not include a decision for the industrial landfill on the site. We are asking for your comments when

the various alternatives presented in the visibility study on how to address it, The EPA consultation with the Tribe and the State to evaluate the public comments and present its verbal alternative for the Industrial Landfill at another meeting right here in Massena, New York, and if possible, at the land of the Akwesasne as well.

The overall objective of our Proposed Cleanup Plan is to reduce the PCB concentrations to levels that are acceptable to human health and the environment.

We define the site as solvent contaminated soils, lagoon sludges, river sediments, wetlands and groundwater that have been contaminated by previous disposal practices at the plant. The boundaries of the site are defined as the end of the contaminated medium.

The purpose of the public meeting is to receive your comments and to the best of our ability, we will answer your questions. If we cannot answer any questions that you may have tonight, we will provide you with an answer in our Responsiveness Summary. A Responsiveness Summary is an integral part of our regular decision which selects a remedy for the site. The regular decision, once signed by the Regional Administrator, provides the justification and the reasons for the selection of one particular remedy over another. I should emphasize that the selection of the remedy is based on one Law, Section 121 of the Law and it requires us to comply with all applicable State

requirements or Tribal requirements, if they are appropriate, be cost effective, take into consideration long-term and short-term costs and utilize permanent solutions in alternative treatment technologies to the maximum extent practicable. There is a strong preference for remedies that employ treatment technologies that permanently or significantly reduce the mobility toxicity for volume of waste.

We have a nine criteria that we employ before we select a remedy. As you can see on the screen right there that we do have these nine criteria ranging from evaluating the remedies in terms of protecting the human health and the environment and complying with all the applicable and relevant and appropriate requirements bit it State or Federal or Tribal reducing toxicity, mobility and volume of waste. The long-term effectiveness of the remedy that we have selected. How economical it is. The short-term effectiveness. Cost, and the last two are State and Tribal acceptance as well as community acceptance.

I should emphasize that at the table as you were entering the Town Hall, we did have some handouts available detailing the Proposed Plan as well as the various treatment of technologies that we used in the Feasibility Study.

At this time, I would like to turn the floor over to Miss Carson to describe the proposed record.

LISA CARSON - Good evening. Many of you may not know me. Maybe you were familiar with my predecessor. Her name was Cristine

Bisnick and I took over the project from her in January.

I would like to say as George did that I will be going over a little bit of background on the site of our planning grounds, and then I will recite briefly our proposed methods.

The information that I am going to be discussing tonight comes from the studies that have been performed by General Motors under Administrative Order on consent which we signed in April of 1985. To date, GM has performed all of the testing and a lot of the analytical work and analysis that are part of the EPA's remedy selection process under EPA Oversite and they have been very cooperative to date.

Talk a little bit about Site Background. The site is an active facility. They produce aluminum cylinder heads, pistons and transmission casings and until 1986 they used the die casting process which used huge machines with high pressures and then high temperatures to actually mold the aluminum into the parts that we needed. Because they used high temperatures and high pressures, they used hydraulic fluids in those machines and they needed hydraulic fluids that would be resistant to fire and so they used PCBs. PCBs were used from 1959 to 1974. The environmental concerns arose nationally and PCBs are now-----(A MICROPHONE WAS PLACED NEXT TO MISS CARSON). Oh, I was wondering why I got pretty loud here. PCB is now considered a hazardous substance and a human cancer causer.

This is just a sketch of the entire area around the General

Motors facility. I thought it might be good for us to sort of get a general frame of reference. Here, we are on the St. Lawrence Seaway coming through here (INDICATING ON MAP). There are a couple of other plants in the area as you well know. One of them is the Aluminum Company of America down here, the Reynolds Metals Company and this is the General Motors facility (INDICATING ON MAP). A couple of other things to point out to you, the boarder between Canada and the United States. Here is another boarder. It's the boarder to the land of Ahwesasne, the St. Regis Mohawk Tribe Reservation boundary. This is an idea of the facility from above. This will give you an idea of some of the holding areas at the site. This area here is the river. This green area here is what we will be talking about using industrial landfill tonight. These four dark areas are the Industrial Lagoons that we will be discussing tonight. The north and east disposal areas lie here (INDICATING). This is just a schematic of what you just saw. Once again, it is just to give you an idea of the areas on the site.

I want to refer to my notes here to give you an idea of some of the sizes of these areas. We have river sediment in the area. This is the St. Lawrence River and you see that the sediments are in a light green coloring and they are hot spots. Hot spots seem to be defined as greater than 500 ppm of PCBs. Then there is a hot spot drawn here (INDICATING). It is very close to an outflow, a water discharge that General Motors has

into the St. Lawrence River. There are about 58,000 cubic yards of contaminated sediments. Those are sediments above 2 ppm and I will discuss that in a minute. In this area, there are also some flowing out into this area here, and then the Racquette River and some sediment flow along these banks and then going right into the river.

The highest concentration of PCBs that we did in the St. Lawrence River was 5700 ppm.

Ok, the next area, the North and East Disposal Areas are here and this area here (INDICATING). The North and East Dispos- Areas together have 225,000 cubic yards of materials. That's material that had PCBs contaminated of close and above 10 ppm. The highest concentration of PCBs found in this area was 31,000 ppm and the highest here is 41,000 ppm.

Reservation Soils, here they're labeled off-site soils and if you like this term, it's off-facility soils. EPA defined the site as where we find the contamination. Here are some soils, we see in this area, we have estimated about 15,000 cubic yards of highest PCBs and off in that area is 48 ppm. There are other soils on the GM property that aren't necessarily associated with any one of these particular disposal areas. The feasibility study estimates 40,000 cubic yards.

This Industrial Landfill - And it's drawn for a reason here, there are 424,000 cubic yards of material here. The highest PCBs here is 4,300 ppm. And you can see that it is an area of

concern because if this is our hot spot at greater than 500, a great quantity of that landfill appears to have very contaminated material.

The Industrial Lagoons, there are four of them. They are here (INDICATING). You can see that the smallest one is 350,000 gallon lagoon is quite contaminated. Altogether, there is 91,000 cubic yards of materials, the soils, the sediment, a mixture in the lagoon. The higher concentration of PCBs found and that was here is 750 ppm. There was also phenol, another contaminate concern, that was found in one of those lagoons had very high phenol 26,000 ppm.

One of the areas has continuous groundwater. There is water in the ground that flows under the site towards the St. Lawrence River and there is also evidence of PCB contamination there and the highest concentration determined is 1.3 ppm.

The EPA assesses risk at the site in order to determine the need for renedial action. The baseline risk assessment that was there at the site shows that from top to bottom of the high risk to low risk, or from greater risk to less risk. By following the greatest risk is from fish and wildlife that is exposed to the contaminated sediments in the St. Lawrence River. By far, a higher risk than some of the other ones while some of these are also acceptable. There are contaminated soils on the Reservation that I pointed out and there are soils under General Motors facilities and there is groundwater.

This is an Industrial Landfill, that big area (INDICATING), with a lot of concentration of PCBs presently holding to a low risk. The reason for that is there is a cap on the landfills and so there isn't much exposure. There is no direct contact exposure. There is not exposure because the stuff is not exposed on the surface and it is not giving any exposure to groundwater that is coming through that landfill. So the risks as we assess them from the landfill are low.

This is the goals of the Superfund Program. George Pavlou touched on those just a minute ago. The first and foremost, what we must do to protect human health and the environment, we must meet Federal, State and Tribal Laws or requirements or Environmental Laws, and Tribal and State Requirements. There is a strong preverence in our laws to treat waste, to permanently remove PCBs in this State. We also have a strong mandate, I guess is the word, is to use innovative technologies. Not just incineration which is a proven technology.

Before we touch on ways to treat waste, I just wanted to mention cleanup levels in the various areas that EPA has proposed and is in the documents that you probably picked up tonight. For sediments in the St. Lawrence River, we have proposed 2 ppm. You remember the highest level detected was 5,700 ppm. We propose 2 ppm as the cleanup level.

For sediments in areas on the St. Regis Mohawk Reservation and Akwesasne, we propose 0.1 ppm. A lower level. That is a

Tribal Standard and remember I said that we have to meet Tribal Standards on their land.

The soils that are on the GM property, the cleanup levels that we are proposing is 10 ppm. You remember there are areas where the PCB concentration is like 41,000 ppm for our cleanup levels. And for groundwater, you would pump the groundwater and collect it and treat it down to a level of 0.1 ppb.

Quickly, the feasibility study assessed various ways to treat PCBs to remove them. The first place, thermol treatment is also called incineration. I mentioned, incineration is much more proven. We use incineration for lots of applications way before we even though of-----so people feel more comfortable with incineration, but they are expensive.

Biological destruction is again a very innovative technology. It uses bacteria which attacks the PCB molecules and changes the form of it so that it is no longer a hazardous waste. When this is successful, the by-products together are carbon dioxide and water.

Thermal Extraction and Chemical Extraction - Extraction technology means that you've taken contaminated soil and treated it either chemically or heated with some chemicals and you get an extract. A very contaminated materials which must then be treated further so the soil that you leave behind is clean. So you extract the PCBs and you're left with an extract and you must do something further with that.

Chemical Destruction means you treat the PCBs, not with bacteria, like the biological destruction, but with chemicals to destroy the PCBs molecules. And solidification is a technology wherein you mix the material with something like a cement type material. It hardens and the idea is that it traps the PCBs in the hardened material and they cannot get out. They are not available.

The way we organized the proposed plan over an area, so that it is possible for you to understand---The first area is the contaminated sediments. By Law, you have to look at the "no action" alternative as well to evaluate that because you will see that on every slide that we will have up here tonight. We also looked at contain or capping the material in place. That is something that we do a lot of times on land, but what that would involve here is putting a layer of sand, a layer of gravel, a layer of bigger gravel on top of the contaminated sediments to keep them where they are, so that fish and other wildlife cannot reach the sediment and therefore we have made it no longer available. And this is highlighted red, increase in sediment because this is what EPA is proposing for the sediment. Red means remove the sediments with some type of dredging device, get them out of the water, treat them at the GM facilities so that they meet our cleanup levels and our cleanup goals, and put them back, not in the water, but on the land.

The treatment that we're proposing is a combination of

incineration for very high contaminated material, material over 500 ppm and biological treatment of material that is less than that. Biological treatment will have to be tested if lower than that to determine that it will indeed meet our cleanup goals.

EPA's rationale for proposing this for Area 1 to eliminate the greatest risk posed by the site. Fish and wildlife are the greatest risk according to our acceptance. Determine and to treat and destroy the material in a combination of biological treatment and incineration upon the cost perspective.

Area 2 is kind of a lump of many areas. The North and East Disposal Areas is considered large areas. Miscellaneous soil that is at this facility that we talked about is 225,000 cubic yards of soil on the St. Regis Mohawk Reservation. We have no action to cap in place. Here, that means that except for the soils on the Reservation, the soils will stay where they are and they would be consolidated in place and a cap would be put on top of it. EPA is proposing excavation and treatment of soil similar to the sediment and go into each of these areas, pick up the soil, again a combination of incineration and biological treatment. This treatment is permanent to remove these threats and that biological treatment and incineration is cost effective. More cost effective according to our studies then some of the other technologies.

In the third area, The Industrial Landfill, the EPA has not proposed-----. There are basically three, although there are

many variations of treatment, there is no action, leave it like it is, cap it in place or excavate the material, treat it like all the rest of the material or treat it by some other technology and replace it.

The reason EPA wanted to get visual comments before we propose a remedy is because the cost of excavating and treating the large amount of material in the industrial landfill, remember the estimates are 424 cubic yards, depending on the type of treatment you use. They can go as high as 203,000,000 dollars. However, on the other hand, there are high concentrations of PCBs in the landfill. They are relatively immobile. They stick to soil, but they are very high concentrations in a large portion of the landfill.

I should note that EPA will, before we make the decision on the landfill, the final decision, we'll be back here just like we are tonight with a proposed plan that addresses that landfill and say here's what we're proposing to do and we'll take comments on that too. Then there will be a whole other cycle for the industrial landfill.

The Industrial Lagoons, we didn't look at a contain in place alternative because there is wet material, so instead we took a look at other action and different treatment scenarios. We're proposing excavation and treatment with a combination of incineration and biological treatment.

And the last area being the groundwater. We looked at no

action. We also looked at containing the groundwater by putting in slurry walls, underground walls which intercept the groundwater so that it cannot flow into the river. It is not currently used for drinking, but what we are proposing is pump the groundwater before it gets to the river, treat it to reduce the amount of PCBs in the groundwater, and then discharge the water.

The rationale here is that it will prevent migration of PCBs into the river system. If we're going to be cleaning up the river, we certainly don't want to recontaminate it in anyway that we can see. The drinking water supply for the Mohawk people, which is down the river a little ways, so e would like to make sure there is nothing going into the river that is upriver.

The total cost for everything that we saw, this is not including industrial landfills, the present work cost is $138,000,000.00.

I think that's all that I have to say.

GEORGE PAVLOU - Thank you Lisa. I should state that as Lisa mentioned, we will be doing treatability studies to determine whether or not biological treatment is an effective treatment technology to achieve our cleanup goals. If, at the end of these treatibility studies, we determine that biological treatment is not effective, then we are proposing to undertake alternative treatment technologies such as chemical extraction or thermal treatment as well. And I should emphasize that. Being

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that biological treatment is an innovative technology, but at the same time it's relatively less costly than incineration or chemical extraction or thermal extraction.

At this point in time, I should also note that all public comments made tonight will be taken by a stenographer and when you speak and you have any questions or you make any statements, please speak very clearly. State your name and affiliation since we have various groups representing various interests here. At the end of the public comment period, we project that we may be able to sign a record of decision in July sometime. After we sign a record of decision, by Law, we will begin negotiating with the Company and as Lisa mentioned, up to now, the Company has been very, very cooperative with EPA and we hope that at the end of our negotiations, we can come up to a solution for cleaning up the site.

At this point in time, I would like to acknowledge Steve Hammond who is representing the New York State Department of Environmental Conservation to make a brief statement. Steve.

STEPHEN B. HAMMOND - Good evening. My name is Stephen Hammond. I am here tonight representing the New York State Department of Environmental Conservation. The Department believes that the Proposed Remedial Action Plan for the General Motors Corporation facility at Massena, New York is a major step forward for correcting the environmental damage that has so greatly impacted this region and especially the environment of the St. Regis

Mohawk Tribe at Akwesasne.

Of particular note, the Department strongly favors the preference for permanent treatment of the various hazardous waste units.

In regards to river or other aquatic sediments, the Department supports the selection of dredging the sediments to remove contamination from these environments. We believe the dredging should be designed to remove contaminants to as low a level as technically and economically feasible with the goal of being protective of human health and the environment. We realize that the remedy that is finally selected must represent a balancing of the desire to protect public health and to restore environmental quality with the feasibility of removing PCB dontaminated sediments from the St. Lawrence River and its tributaries. As to the dredge spoils, the Department remains skeptical that bioremediation can successfully treat the contaminated dredge spoils to low levels within a reasonable period of time. Therefore, the Department requests that other technologies be tested concurrently with pilot plant and treatability studies being done for bioremediation.

As to onsite soils and sludges, the Department again supports the selection of treatment technologies to remediate these wastes and soils. During the design phase and/or implementation of the remedial alternatives, the Department believes EPA should examine and document the feasibility of reaching a lower cleanup

goal than 10 ppm PCBs.

As to the industrial lanfill, the Department believes sufficient information exists about the landfill and its environs to select at least the beginnings of a remedial action plan. Existing information dictates the need for leachate and groundwater recovery and treatment to prevent off-site migration of contaminants to Turtle Creek and the St. Lawrence River. The Department also believes further investigation in a more comprehensive nature is needed to better characterize the extent and nature of contamination with the waste mass. Additional information is especially needed to identify areas of high contamination of what we call greater than 500 ppm of PCB. Based on the collection of more complete information, the selection of an appropriate remedial alternative can be made for final remediation of the waste mass. The selected remedial action should include permanent treatment of the waste to the extent that is feasible. To summarize, about the landfill, the Department expects a comprehensive approach to the landfill that would include groundwater and leachate collection, containment and treatment; remediation of the waste pile or portions thereof as determined feasible; and lastly, a proper closure of the landfill for wastes that will remain.

The Department recognizes that remediation of the General Motors Site will involve large volumes of wastes at varying concentrations of contamination. Therefore, it is anticipated

that the treatment of the various waste streams, once they are securely removed from the environment, will involve varying types of treatment technologies. The Department supports the thermal destruction of PCB wastes greater than 500 ppm. The Department is skeptical as to the viability of bioremediations, as I spoke earlier. Therefore, should pilot plant and treatability testing be conducted for bioremediation technologies, the Department requests that other appropriate technologies be tested concurrently. In this manner, should the bioremediation treatability and pilot plant work be unsuccessful, then another remedial technology could be selected without losing time. The Department is also prepared to consider secure land burial of soils and sediments with low concentrations of PCBs, in order to get more contamination out of the environment.

In summary, the Department recognizes that considerable engineering and scientific analysis are still needed to implement the conceptual plan outlined by the EPA. Given this, the Department believes the opportunity exists to evaluate the feasibility of remediating to lower cleanup levels than EPA has proposed. It may only require a relatively small addition of funds to feasibly remediate to lower, more protective cleanup levels. However, there is no doubt that the proposed remedial action plan as outlined will remove a considerable amount of contamination from the environment as a significant step forward.

In addition to these comments, the Department will be

providing written comments before the end of the public comment period. The written comments will provide greater detail and description in the discussion of the Proposed Remedial Action Plan.

Thank you.

GEORGE PAVLOU - Thank you very much Steve. At this point, I would like to recognize Jim Ransom, a Sub-Chief for the St. Regis Mohawk Tribe and also the Environmental Director. Chief.

JAMES RANSOM - Thank you. Also, I'm a member of the Task Force on the Environment. We have assembled as a group to help us understand to address the GM Site and I just want to quickly mention some of the people that are here tonight. Doctor Henry Lickers, who is Director of Environmental Division of Mohawk Counsel of Akwesasne. Ken Jock, Biologist of our staff. Diana Henderson, Cornell-American Indian Program. Richard DuBeg who is the Environmental Counsel for the St. Regis Mohawk Tribe. Doctor Stephen Pennigroth with the New Jersey School of Medicine and Dentistry. We have two, what we call TAG Consltents here tonight. Doctor Hank Appleton with Palladin Associates out of Syracuse. They're commenting on Risk Assessment, Feasibility Study and PRAP on behalf of the Task Force. Joseph Tessitore from Cross and Tessitore out of Orlando, Florida. He is commenting on FS and PRAP. He specializes in Hazardous Waste Incineration and will be addressing that issue on behalf of the Task Force. Our TAG Consultants will be presenting reports to the Task Force

which we will make available for public comment.

St. Regis Mohawk Tribe is a governmental entity under SARA as well as one of 4 Natural Resource Trustees for the GM Site. In general, the St. Regis Mohawk Tribe is very supportive of the EPA Proposed Plan for cleanup of the GM Superfund Site.

In particular we appreciate selection of a permanent remedy for the site. Recognition of the Tribe as a sovereign enity by EPA and the State. Recognition of the Tribal ARAR.

The Mohawk people have lived along the St. Lawrence River for hundreds of years and will continue to be here for hundreds of years more. The river is the heart of our community. We have depended on fish and wildlife to feed our community for aeons. The St. Lawrence River as Lisa Carson mentioned is now the source of our public drinking water supply.

Selection of a permanent remedy for the entire GM Site is critical so that future generations of our people and others who utilize the river are not at risk from contaminats migrating from the site.

We are appreciative that EPA has recognized the Tribes sediment PCB cleanup standard as a cleanup goal for the Reservation sediments and Racquette River sediments. The Tribe's PCB cleanup standard for sediment is 0.1 ppm. The Tribe would like to see the PCB cleanup standard for sediment extended to the St. Lawrence River sediments. The St. Lawrence River from the mouth of the Grasse River to the western border

of the Reservation is part of our traditional hunting and fishing territories.

The 2 ppm PCB cleanup standard for the St. Lawrence River sediments proposed by EPA will result in a residual that will continue to impact the St. Lawrence River ecosystem. Although the Tribe's sediment PCB cleanup standard may not be technically achievable, we believe it is important to set goals that will be protective of the environment in addition to human health.

While we support the principle of selecting a permanent treatment technology as the remedy for the GM Site, we have concerns with the incineration and biological treatment technologies selected by the EPA as the preferred remedial option for this site. We believe that EPA should require GM to conduct treatability studies on other permanent treatment technologies, such as chemical destruction, chemical and thermal extraction, at the same time as treatability studies for incineration and biological treatment. We are concerned that these two technologies, one in particular, the biological treatment be proved effective unless you have an ulternate ready to go immediately, you know, cause more delays and result in more impact on the environment.

The largest waste area on the GM Site is the industrial landfill. We understand the difficult decision EPA faces in regards to the cleanup of the landfill. Depending on the remedy selected, the cost could range from 3 million dollars to 200 million dollars. Our position on the landfill is that a

permanent remedy be selected as has been for the rest of the site.

Capping of the landfill is not a permanent remedy. It represents a cover-up, not a cleanup. We are sensitive that it will be costly to cleanup the landfill. We have discussed and will continue to discuss with EPA, New York State and General Motors representatives allowing General Motors time to explore different permanent treatment technologies that could be used to cleanup the landfill. In exchange for this time, EPA should require GM to initiate interim remedial measures to isolate the landfill from the surrounding environment. In addition to the existing temporary cap, a slurry wall and groundwater control wells need to be placed to stop the horizontal flow of PCBs into the St. Lawrence River from the industrial landfill.

In summary, the Tribe will be submitting additional written comments on the Proposed Plan in regards to parts of the Proposed Plan that the Tribe is in disagreement with, as well as continuing to work with the EPA, the State of New York and General Motors to resolve our differences.

I mentioned earlier that the Tribe is one of 4 Natural Resource Trustees. The others are the National Oceanic and Atomospheric Administration under the Department of Commerce, the Department of Interior and the State of New York. John Privitera from the New York Attorney Generals Office will make a statement on behalf of the Trustees.

GMM 007 1900

JOHN PRIVITERA - Thanks Jim. Good evening folks. For those of us who work in the public interest, it is heartwarming to see how many people are here tonight and to know what public interest there is in this project. You are as much a part of this process, each one of you, as anyone else in the room. So speak what is on your mind and what you do is to ask questions.

I am an Assistant Attorney General in the New York State Department of Law in the Office of Robert Abrams, the New York State Attorney General. I am an attorney in the Environmental Protection Bureau. It's important for you folks to understand tonight, that, if it's not already quite clear, that tonight's meeting relates only to the Federal Proposal to cleanup or as is said tonight remediate or remedy certain pollution which is had and emanating from the GM facility. There is, of course, other nearby contamination in the local river system and the local environment and the local resources. Particularly in what we call the St. Lawrence-Racquette-Grasse River System. That contamination is, has, emanating from the Reynolds Metal and Alcoa Facilities. Remedies for these areas, for Reynolds and Alcoa, will be addressed separately and discussed in other public meetings from a remedial point of view.

Moreover, even as to the GM Site, the proposed remedy under discussion tonight is not to resolve all of the consequences of the pollution. According to law, in addition to the remedy under discussion and whatever remedy is implemented, Natural

Resource Damages must be addressed. As Jim Ransom mentioned, there are 4 Natural Resource Damage Trustees who have obligations to you folks, to the public at large, to see some of the natural resource damage process. They are New York State, acting through the Commissioner of the New York State Department of Environmental Conversation. That's Thomas Jorling. He is the designated trustee, designated by Governor Cuomo. Attorney General, Robert Abrams represents him as his lawyer in this matter. The other trustees are the National Oceanic and Atmospheric Administration which has Trustee obligations with respect to Marine Resources in the area. Of course, the St. Regis Mohawk Tribe is a trustee with respect to their resources. And the Department of Interior is a trustee, acting through its sub-agency or interested to its sub-agency, the United States Fish and Wildlife Service. This is certain species that are impacted in the area.

We have, we understand that we have overlapping trustee matters. We have overlapping resources and so we have decided to work together. We have coorindated our efforts. We're actively meeting together, the four of us and have organized ourselves and have come to terms in a memorandum of understanding as to how we will work together to address the damages to the natural resources above and beyond any remedies selected. That process is one that you will learn more about, but in general, that process requires the development and, at first, the

development and implementation of a plan to assess the damages for the injured, destroyed or lost natural resources. That will include that plan that will be developed. An Assessment Plan will study not only the damages from the loss to the resources from the time of the releases of the contamination to the time it's cleaned up, but will also address any residual harm to the natural resources after the remedy which is selected is implemented. It will determine the cost, we will work together to determine the cost and expenses likely to be incurred for restoration of the resources and that, in fact, is our mutual goal to restore the natural resources and beneficial uses in the entire area that has been impacted by the contamination from these treated sources. And we will ultimately determine the value of any loss of use in other matters.

This work, of course, will have to be coorindated to the maximum extent practicable with activities such as those discussed tonight that have to do with remediation. But this goal of restoration will, of course, take sometime and it will require your input.

Our first step, we anticipate commenting on tonight's remedy in consideration of the interplay, if you will, between remedial response actions and ultimately the goal addressed to restoring the natural resources. But we will also, this year, be developing an Assessment Plan. We have begun, and that study will require taking more data than what has been taken

before planning a remedy. That is to say that we will be taking more biological data. We will be trying to determine pathways of exposure and contamination to resources for the goal of restoration. We are in dialogue with these three companies with respect to our obligations to restore and our obligations to develope an Assessment Plan, and we anticipate further discussions with them this year as we work toward the goal, at first, of developing a Natural Resource Damage Assessment Plan for this entire area of concern.

We anticipate developing that plan with your help this year and without getting too distracted from the remedy tonight under discussion, we will advise you of public meetings to be held with respect to that Assessment Plan and when we have what we think is a good Assessment Plan, that is in the public interest, we will bring it to you, we will announce the public meetings and we will ask for your input at that time. There will be other public meetings after that as we work towards the natural resource damage work. But we thought we would make these comments tonight just so you understand that there is this separate process going on and we will look to you in the future for input as to that.

Thank you.

GEORGE PAVLOU - Thank you John. I would also like to emphasize that the dredging of the river is a top priority for EPA as well, since it represents the greatest risk to human health and

the environment and we would be implementing the dredging of the river first.

To save time, I should also point out that last October EPA issued Administrative Orders to Reynolds Aluminum as well as Alcoa requiring them to undertake studies in the St. Lawrence as well as the Racquette River Eco System to determine the extent of the contamination and come up with possible alternatives for cleaning them up.

At this point in time, I would like to again recognize the public and I would be pointing to people to, you know, come up to the microphone. Again, speak clearly and slowly so that the stenographer can transcribe your comments. I am sorry. I didn't recognize you.

DANIEL GREEN - My name is Daniel Green. I am a Canadian Citizen from Montreal. We've heard today the people of the United States, your government. We've heard today people representing the Mohawks.

I guess, I feel obliged to speak for another people of this continent, the Canadian people and as an impactive Canadian, I would like to point out that Canada and my government, and there is a lot of Canadian Government representatives here, both from the Ontario Government, the Quebec Government and the Federal Government of Canada. We are also impacted from this sediment.

We would like to point out that, and we will, we are thankful to EPA for allowing our Canadian input and extended the

process, and we understand that EPA will be coming to Canada, to Cornwall, Ontario on May the 9th, to listen to Canadian concerns of the GM Site, and we are thankful of that.

We believe that, this is the first I guess, under the Superfund, the American Superfund System, and we're not aware of any other site that has this much implementation. We are also aware, and you correct me if I am wrong, that the GM Site, the National list ranking is around #40, and I would cite that, I guess we all know, the New York State Love Canals are around 200 in ranking, or is it higher than that?

GEORGE PAVLOU - Are you talking in terms of how they rank in terms of the thousands of sites that we have?

DANIEL GREEN - Yes. The 2000 sites. So my understanding is that according to EPA ranking, this site might be higher ranked than Love Canal. Is that possible?

GEORGE PAVLOU - Bear in mind that, you know, the way we rank sites determines the need for a cleanup action. When we do rank the sites, it doesn't really determine the actual risk represented by the site unless we undertake studies.

DANIEL GREEN - Well, the point is, I'm saying that a site of this ranking being 5 kms from Canadian waters. You must understand the concerns of the Canadian people and we would like the Federal American Government to recognize that Canadians are very much concerned with this site. They're concerned on remedial options. We will be presenting to you our concerns. We have developed

our own cleanup levels as you probably, ARARs. We will be presenting that to you on May the 9th. We hope to have representatives from the various governments at that meeting also, and they will be there, and this is an initiative from the Citizens Group of Canada, trying to get our governments on line. We would like, if possible, to have each area in the Canadian Government formalize a relationship, dealing with the GM Site, and ultimately dealing with the other two sites in this area impacting Canadian waters. We believe that it has been hazardous to us, we're given phone calls at the last minute, bargaining and sometimes even threatening. We would like better relations with the American Government in dealing with this common concern.

You talk about treaties. You talked about Mohawk rights. There is also a treaty between our two countries. This is called the Boundary Waters Treaty of 1909. In Article 4, this Treaty, with incredible foresight from our governments back then said "When the two parties agree not to pollute the boundary waters and not to pollute waters crossing the boundary". Looking at the data, we have a clear case of pollution crossing the boundary, and this is why Canadians are concerned and we hope to be involved, very intimately about cleanup decisions, also monitoring, and also in possible interventions when things go haywire during cleanup, so that we will be informed prior to having things appear in the newspaper or if there's ever an accident on the site during the cleanup.

Thank you.

GEORGE PAVLOU - Thank you. At this point in time, I would like to recognize some of you and please, allow me to recognize you because if we don't have any order, we will, so you know, allow me to recognize you so that we can have some kind of order in this public meeting.

BEN SCHERSCHEL - George, I want to intervene shortly. Ben Scherschel. I'm with GM and I would like to make an Opening Statement, but I first would like to point a clarification. During the introduction, many of us came here to make statements, a personal statement and you said for it to last 3 to 5 minutes. Ghat's acceptable?

GEORGE PAVLOU - Yes.

BEN SCHERSCHEL - Are you going to go by show of hands?

GEORGE PAVLOU - At this point, yes.

BEN SCHERSCHEL - Ok, thank you.

My name is Ben Scherschel. I am the Plant Manager of General Motors.

First I would like to say on behalf of General Motors for allowing me and other GM Associates to participate in this process. I would like to thank you for the involvement of the public. GM produces aluminum cylinder heads as a casting process. At one time, the foundry utilized a PCB based hydraulic fluid because of its fire characteristics in the die casting process. Waste materials from that process were deposited in locations

in locations on the plant site. Although we no longer produce automotive compotents via die casting process, and we have not purchased PCB-hydraulic fluid since 1774, whe waste products remain.

General Motors accepts responsibility for PCB materials on and near our plant site as well as the past, as that has been part of our past operations. We are prepared to accept reasonable and proper remediation costs.

Working with the EPA, DEC, DOH, SRMT and professional environmental engineers, we have proposed an effective plan to eliminate any hazards that may exist as a result of PCBs that were once used in our foundry. Our plan uses a combination of treatment and engineering controls tailored for each area to protect both human health and the environment. We are also prepared to monitor and control the site for as long as necessary, in collecting PCB containing soils on Mohawk land and the Raquette River for treatment on our plant property.

The North area which is well away from where people are living. This is to be dug up and treated. The East disposal area which is nearer to the Tribal lands, and to dig up or disturb is potentially hazardous to the people there. In addition, one-half of the material in this area is concrete slabs and construction rubble which make treatment by conventional technologies difficult. We plan to contain this deposit with a synthetic membrand and three feet of clay to keep out rain and

snow melt. We will evaluate natural biological dechlorination of PCBs in this location.

The landfill is also close to Mohawk lands. It also contains bulk debris such as old casting furnaces. It is currently protected by water-resistant cap. Our recommendation is additional protective covering for the landfill. A series of groundwater recovery wells are planned to provide a barrier between the rivers and onsite of deposits. Water collected in these wells will be processed through the state-of-art carbon column water treatment plant of our operations.

We propose to protect the aquatic life from exposure to PCB containing sediments near our outfall in the St. Lawrence with graded filter technology. Natural breakdown of PCBs is already occurring in these sediments. We propose to evaluate that process further.

Of the four on-site lagoons, two are inactive, and we propose to remove the materials they contain for treatment. The other two lagoons recirculate water on a daily basis, and we need them to provide water for the lost foam process at the plant. We propose to evaluate the natural breakdown of the residual PCBs in these lagoons. These lagoons also collect rain water requiring limited discharge. Any water removed from the working lagoons is treated by the best technology available for filtration of PCBs prior to discharge. Our discharges continue to meet EPA and State requirements.

We believe this to be a responsible plan that provides long-term protection for human health and the environment, and we are prepared to begin this remediation process immediately. We stand committed to a healthy environment, protection of human health, and future of our plant employees and our neighbors.

Thank you.

GEORGE PAVLOU - Thank you very much. Please raise your hand so that I can recognize you. State your name and affiliation?

RUSSELL NELSON - Russell Nelson and I speak for myself. I would point out that we at the GM has a fiduciary share of responsibility to their stockholders and if they do carry out that responsibility ensued by the stockholders, then GM has a very strong financial stake in producing the best cleanup of their waste as possible. And I would also like to say GM has been careless in the past of their waste. I fully support private property and if they can find a way to use their own property and not letting it escape onto other people's property then they can do so, but they have not done that. And they should not be trusted to do so in the future. This something that's based on experience and not.

And I do support the EPA's choosen remedies and I think the landfills should be cleaned up also.

Thank you for letting me make this statement.

GEORGE PAVLOU - Thank you.

CHARLES BOOTS - My name is Charlie Boots. I am the Mayor of

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Massena.

As Mayor, I am the concerned citizen and I feel it is important that I speak tonight at this meeting. Years ago when Central Foundry announced their phasedown, concerned citizens formed a group to help revitalize the economy of our area. The topic that we have tonight is about the same size that we had here a number of years ago when General Motors made the untimely announcement that they were closing. We, at that time, thought that Massena was going to go down the drain. It hasn't. It's been very, very hard to bring things back.

We have worked very hard with our industries in the last few years and with that we have been involved with their business and problems then in the past. Because of that, I feel more qualified to speak than I would have in recent years. I am also on the Citizens Advisory Committee.

Our Village and area has been incorrectly charactorized as an industrial wasteland. We have three large companies in our community that helped us to improve our tax base and with our quality of life. The companies are not running from their responsibilities in developing plans of concern. GM has developed such a plan and I support that plan. The EPA does not distinguish between the operating lagoons and the inactive lagoons. This concerns me since any action in this type of lagoon might disrupt the operations of the plant. There is no need to remediate now. The GM Plan is to evaluate natural degradation

of sediments in the area, combined with the groundwater recovery system and the filtration of any surface water discharge, there will be no invironmental impacts from these lagoons. I think it's important to know if the EPA, in its proposed plan recognizes that its preferred remedy as well as GM's remedy are protective of human health and the environment. However, to achieve this protection, EPA proposes to require the expenditure of over three times the money GM says it is necessary to do the job.

I don't pretend to represent that I understand the technical details of each and every one of these proposals. However, it is clear to me that the GM approach makes more sense. As I said before, Massena is a very good area to live in and to work in. It is not a chemical wasteland. Like many other twons, some of our industries have environmental problems. GM has one and they recognize it. They've expressed a committment to move quickly and to solve this problem and I support the Gneral Motors Plan.

Thank you.

GEORGE PAVLOU - Thank you Mr. Mayor. I should point out that those of you who have written comments, if you care to submit a copy to the stenographer, we would be more than glad to accept them. I would recognize the lady. Would you please state your name?

MARY BURNS VERLAQUE - Good evening. My name is Mary Burns Verlaque and I am the Director of the St. Lawrence County Planning Office and the St. Lawrence County Environmental Management Council.

I am here tonight to deliver the recommendation of the St. Lawrence County Environmental Management Council, we call it EMC, regarding the proposed remedial plan for the Massena General Motors Central Foundry site. The EMC may submit subsequent comments in writing prior to the close of the comment period. The EMC is a twenty-one member unit advisory board whose members are appointed by the St. Lawrence County Board of Legislators. The primary purpose of the EMC is to advise the legislature on matters affecting the environment and the county. The EMC has no regulatory power. The recommendations of the EMC are as follows: First, with regard to the industrial landfill - Area 3, to which you requested special input. The recommended alternative is to construct a properly graded and compacted composite cap, using three feet of clay, one layer of flexible membrane liner, one layer of drainage material, one layer of geotextile, 18 inches of rooting soil and six inches of topsoil. In addition, the site should be revegatated to control erosion and groundwater recovery.

The covered well and trench system should be installed to capture and treat leachate coming from the landfill. Also, at specific points in time, left to the judgement of the EPA, an assessment should be made of the quantity and quality of leachate leaving the site, and, simultaneously, the maturity of MC2 security remediation technologies which could address the contamination.

If at any time, the groundwater monitoring and recovery system showed PCB levels equal to or break those which currently exist, or in the event that future groundwater standards applicable at the time of site review are countervened, the sites would be excavated and treated using high temperature incineration and/or chemical biological methods or otherwise permanently remediated.

With regard to the other areas, the EMC concurs with the preferred alternatives of the EPA for remediating the other areas associated with the site. After dredging is completed, monitoring of the remaining river sediments should occur at defined periods during remediation of the entire site to ensure no recontamination from on-sit sources is occurring.

With regard to ongoing monitoring, the EMC recommends that a provision be written into the decision that funding be provided to the St. Regis Mohawk Tribe to permit ongoing independent monitoring of remedial actions.

Thank you for the opportunity to comment.

GEORGE PAVLOU - Thank you very much.

ROBERT MACLELLAN - My name is Robert MACLELLAN. I'm the U. S. Co-Chairman of the St. Lawrence County Restoration Council and a member of the Citizens Committee for the Massena Remedial Action Plan.

I am speaking on behalf of only myself. The first thing that I would like to do is I would like to present the petition

that has been circulated and we recognize it and present these to you.

The people of the United State, Canada and the Mohawk Nation support the proposed cleanup of the GM Superfund. We recognize that the Industrial Landfill be excavated similar to the other contaminated areas; that river sediments be treated to levels of .01 ppm and the treatment technology thermal condition to biological degradation and emission be considered.

I think it's appropriate in the State, Earth Day, to look at the pollution. Particularly, we need to excavate and treat the industrial landfill in those proposal areas, all of the lagoons. We need to address, in particularly in terms of the industrial landfill, some of the emissions from the process of excavation.

When I was looking over the Health Risk Assessment that was done by the Protection Agency, I noticed the particular high emission from sediment movement. So I looked at it a little bit closely and I felt that if they used a different truck that had 10 wheels instead of 12 and a slightly smaller load bearing capacity which actually could be purchased from Credle Equipment in Potsdam, that they could reduce by 23% emissions according to the calculations there. And that if they further, if they used their same trucks in the initial installation and reduced the speed from about 10 miles per hour, they could also be able to reduce emissions by 38%, and with this load they would be able

to reduce emissions from heavy equipment movement by 50%. I believe that there are other reductions that can be accomplished within their excavation processes. The largest increase in health risk associated with that particular site, and certainly other things should be used in other sites as well. And I bet they probably would give you a pretty good price on it, GMC.

I also would like to see the sediments in the river dredged and treated to the .01 ppm. The soil loss calculated risk assessment amounted to something like .14% of the total of 25 cubic meters. That amounts to an average total loss of 3.3 pounds total for the period of the project. Put that into prospective during a 6 months, a nine. Alcoa discharged something in the neighborhood of 15 pounds to their 001 and so it's not significant.

Finally, we would like to ask you to explore other treatments at the sametime you're looking at biological digradation thermal incineration. Certainly thermal incineration is the only technology at this point that's used, but it's track record is not all that good.

I appreciate this chance to talk to you and I wish you all the best and it's been a pleasure to work with everyone involved with it.

GEORGE PAVLOU - Thank you very much.

DONALD MONROE - My name is Donald Monroe. I am president of 465 UAW Local. I am representing the employees of the Central

Foundry Plant in Massena. I am also a twenty-two year employee at that plant and have operated and set-up the machines using the PCB oils, as well as working in the Shipping Department where I packed contaminated materials for shipment. Since the initial recognition of the dangers posted by this material, General Motors has always provided the proper protective equipment and the training necessary for job assignment in a safe and healthy environment.

I have three major concerns with the Environmental Protection Agency's Proposed Remedial Action Plan for the General Motors Site at Massena: First - I am concerned with excessive excavation at the site. I believe that where excavation is necessary and low-level rish to the health and safety of the GM employees and people in surrounding areas, excavation is the proper solution. But if health and/or safety risks are high, I believe new technologies are appropriate.

Secondly - If we want to produce man-made diamonds from coal, we do not incinerate, we pressurize the coal. Incineration of the coal produces acid rain. What will the incineration of PCBs produce? This is a question I want. The auto industry, as well as other industries spend millions of dollars daily on technologies to reduce emissions from vehicles and their plants to reduce the harmful effect to the ozone layer meeting government standards. Yet, Government Agencies prescribe that these same industries incinerate hazardous waste that could have an

unknown effect on the ozone layer. I remind you, that the Government recommended the use of PCB contaminated oil, not that long ago. I ask, where is the common sense to all of this? I further assure you that not one reputable environmentalist has ever favored trading-off one form of pollution for another form. I say, let us make building blocks from these contaminates, and not acid rain.

Third - I am concerned about job security of the UAW Local 465 membership, at a time that this same membership, together with Management, have proven their capabilities to become viable. Elimination, or worse yet, stagnation of these jobs would be an economic depression to the entirety of the northern New York.

I request that the Environmental Protection Agency rethink their proposal and address these concerns for the benefit of all parties involved.

Thank you.

GEORGE PAVLOU: Thank you very much.

ROBERT KLEIN - My name is Robert Klein. I am representing myself.

I appreciate the opportunity to comment on the proposed options for remediation of the Massena GM.

It is the responsibility of the EPA to decide between options for remediation of the GM Superfund Site. As I understand the situation, two basic strategies have been offered. General Motors believes that the problem would be addressed adequately by covering the sediments and capping. The Akwesasne Mohawks, who live

close to the site, have actually come up with a plan, which involves the dredging of sediments in the St. Lawrence and Racquette Rivers, plus treatment.

As a citizen with a considerable tax burden, I realize that it is the public who must pay, for at least part, of the cleanup. However, as many other practical individauls have, I have learned that when a task is performed cheaply, it may need to be repeated.

It is interesting that GM has raised the point that PCBs may be released into the water during dredging, or into the air during other clean-up operations. These concerns would tend to support their idea that capping the sediments would be safer. Happily for them, this would suggest the less expensive option. I wonder, if some degree of self interest is involved her. Hopefully, the EPA will require the job be done properly; the sediments removed and treated, and care be taken during the clean-up that additional contamination not occur.

Finally, it is my view that the EPA should allow flexibility in treatment options, rather than requiring specific biological techniques, and especially rather than requiring incineration.

In my opinion, the clean-up of Superfund Sites should be a national priority. I am one citizen who would be prepared to make sacrifices which might be necessary to insure that this task be performed properly in any region of the country.

Thank you again for the opportunity to comment.

GEORGE PAVLOU - Thank you Mr. Klein.

SHAWN GRAY - My name is Shawn Gray. I am with the Citizens Advisory Committee of the Remedial Action Committee for the area concerned here in Massena.

I I am here now, more for clarification to the record and not to offer anything as to which method of cleanup is best. The petition what was just admitted by Mr. Maclellan. The names on that petition were garnered at a booth used by our Citizens Advisory Committee. Because of the problem of public perception is that the position of the CAC supporting the more costly of the two cleanups. To make it clear for the record is that the CAC is not taking that position and wouldn't be in the future.

To reiterate my point this evening was to just let you know it's the official position of the citizens.

DARREL PAQUIN - My name is Darrel Paquin. I am a teacher in town and also a St. Lawrence County Legislator. I have questions and comments that I have prepared and I would just like to comment on things that happened earlier.

It would seem to me as common courtesy to have allowed you to recognize Representatives from General Motors. You recognized people from Akwesasne. You recognized somebody from the Attorney General's Office. It's common courtesy, it seems to me, seeing as how they have a big stake in this affair, they should have been recognized to present their comments. Secondly, I would

also like to comment as Mrs. Verlaque pointed out earlier, the proposals submitted by the Environmental Management Council isn't necessarily the recommendation or the opinion of the St. Lawrence Legislature.

My specific comments concerning your landfills, you said you are soliciting comments on alternatives for cleaning up the industrial landfill. The cancer risks you mentioned in your report are 100 times greater for excavation and incineration than they would be if the landfills were capped. Also, the cost of the excavation is about 200 million dollars more than capping. It would seem to me that if one is that much safer and that much cheaper, there should be no doubt as to which is the better approach.

Secondly, why are there no health risks shown for the different options in the other areas as you state in the option of the landfill? If excavation is a greater health risk in the industrial landfill, wouldn't that also apply to digging up the disposal areas.

Thirdly, how many total cubic yards of the dirt are you talking about that you will need to burn? What will be the environmental impact from the emissions from these portable incinerators? How much energy is necessary to run these? How long are they going to have to be run? I have heard reports that if one incinerator running 24 hours for somewhere in the neighborhood of 10 to 15 years, then that defeats the task

you're trying to set. Comparing this to how long it takes to simply cap disposal areas and provide filters to contain the sediments along the St. Lawrence River, that's more common sense to me. I believe the nine criteria that you set forth in your plan, that short-term effectiveness was one of those criterias.

The question of the feasibility of dredging the sediment in the St. Lawrence. Digging up the river bed contaminants would seem to me that they would be sent downstream. A graded filter would keep the present PCBs in place and prevent fish and other marine life from exposure to these contaminated sediments.

Please keep in mind that in your own baseline endangerment assessment for this site and "the most significant public health risk is from human ingestion of fish which have been exposed to PCB contaminants in soils", not direct contact with the soil.

It would seem to be focusing on those alternatives which prevent fish and wildlife from coming in contact with contaminated areas and you should be searching for alternatives which will accomplish this as soon as possible. To me, that suggests containment and capping, not dredging, excavation and incineration.

Thank you.

GEORGE PAVLOU - Thank you very much. Lisa would like to respond to one of the comments.

LISA CARSON - Just because we had a gentleman ask a few questions and the fact that the proposed plan in which we actually talked

about the health risk for the industrial site and was silent on the other areas because we wanted to give you the ---- information as you try to form an opinion, your opinion, about what you'd like to do about the landfill. And we thought that those opinions although they are sometimes confusing were the reasons that a lot of people are here. The other risk numbers are available in the information repositories. That's how come they weren't put in there. We just wanted to give that emphases to that area.

The other question that the gentleman asked was how long the incinerators run. Most plans estimate six years after the incinerators are constructed. I think it's 400 and some cubic yards of soil we're talking about incinerating, 100,000 cubic yards or something?

GEORGE PAVLOU - The gentleman in white.

MIKE CURRAN - It's not that I'd ever say anything to defend GM, but it's---.

GEORGE PAVLOU - Can you tell us your name Sir. I'm sorry what was your name?

MIKE CURRAN - Since we're all responsible for anything that we advocate and to the Federal Government here, set these standards and said that PCBs could be used up to a certain point. The amount that was used up to that point and the way that they were used, the companies that used them should not be held responsible for the damages that they caused. If anyone is held responsible, it should be the agency that told them to use them. You people

are also an agency. You can't come up and pull nails to contridict a private company at fault for part of the guidelines given by a Federal Agency of years ago. That is something that you should think about.

I worked down at GM a few days. If you are really serious about PCBs, checkup the life history of all the men that worked at GM and ever handled PCB oil. These hoses broke and the hot oil hit the men from head to foot. There's never been any fallow up at all of what the damage is suppose to be to these people. So it makes me think that you really are not serious of what PCBs do to you.

The Lisbon landfill, DEC got up and done their ----, but DEC officially lied to the Planning Board and told the County Planning Board that vegetable oil was going into the landfill. Until then all the PCBs and this and that was going in there and they cleaned it all up and it cost around 23 million. Again, if you were serious in having the EPA and also what was put into the Lisbon landfill, was put in by you people, oil and all and you never followed up a single one of these or anything else. It's so dangerous that you had to spend 23 million dollars. Somebody is lying and you people are.

Now, I watched the landfill for awhile. It had three little pools there and Pierce tried to make a good big job out of it. They contracted it as long as they could and so they put it all into one pool and they filled the others with all the water in

the area and it run over and purposely overflowed. There was a half million dollars worth of damage done on that. Then you come back and done it all over only you mixed potash with some other stuff together probably to hold it and there's no way you could put it in, potash to hold it. It's a material and a compound.

You had better share with GM. As far as Indians are concerned, they are good people. I have cut a lot of logs and everything down there, but there is 8000 acres there and it's the best land there is and in 100 years they haven't even learned how to raise beef and begetables and there's 10 junk cars in the dooryards down there.

Cleaning up the river first, that's the most stupid thing while the pollution is still on the land. You cleanup your land problems first and then cleanup the river afterwards.

GEORGE PAVLOU - Ok, thank you very much. We should share some of the ---in terms of treating disposals, you know, at the site. Let me say that in no way, when GM were doing the PCBs that they were doing something illegal or they were violating issues. In those days, I guess, the government as well as the private industry's actual risks posed by these oils. They're more sophisticed and knowledgeable about the risks associated with these toxic chemicals. The concern of legislation that was recognized, that if indeed we discover any sites, any disposal sites with toxic substances or hazardous waste disposal, we have

to clean them up. That is following the law.

Following the life plan for the employees, employees who work with PCBs with their bare hands, we, as EPA, we recommend that to our sister health agencies, be it the agency for toxic substances and diseases, to actually do a health study and that at this point in time, GM partially funded in, with the New York State -----so there is a health study. If any of the employees who work for GM believe that they were exposed to PCBs such that they were impacted, they can make a request and we in turn can contact the agency for Toxic Substances and Diease and request that they do an assessment, a health assessment, as the law allows for that.

TOM PLASTINO - I am a member of the County Environmental Management Plan. I am now only speaking for myself.

This is a serious environmental contamination. We're all learning a lot as the years go by. This is not going to be an exception to the particular risk sites in this region. I support the EPA and for alternatives. Primarily because I am concerned for the burden of care which the alternatives chosen by GM involves. Who is in care of the site acquired after EPA remediation efforts are completed? There will be even more constant care required if the condition by General Motors ---. That constant care as opposed to an instruction of the majority, as I think a long generation of concern that represents this area, whether Canadians, Mohawks or American Citizens should be

concerned about. I would be concerned because of technology being proposed by all parties are still in need of testing. And that we should agree that the subject was raised about stirring up oils and about emissions from incinerations are things that should be seriously addressed. At the same time, god knows how long-term, but long-term monitoring, pumping , treatment, this should be stopped.

Thank you.

GEORGE PAVLOU - Thank you. Let me also state, the law requires that if EPA, if at any time we leave any contaminants, that we reassess our remedial action, I believe, is 5 years to make sure that remedy is working properly. You're right, immediately after we complete our remedial review, we go into a phase to make sure everything is working.

In terms of, you know, concerns with respect to the dredging of the river, we fully intend to take any preventive measures that we can to prevent any migration of the sediments expended in the water problem further downstream and to minimize those as much as possible. It is our intention that we would do a conformitory monitoring to make sure we dredge down to the levels that we indicated we would be dredging and the same thing in incineration.

(RECESSED FOR 5 MINUTES)

DAVID MAC LENNAN - My name is David MacLennan and I am a resident of Massena. I should say I am an concerned resident. I teach

school here in Massena and I have for 27 years and I am also a member of the St. Lawrence County Legislature. I represent District 22 of Massena. There's no doubt that society's expectations are changing and we must stop damaging the environment and correct the mistakes that have been made in the past.

I have visited the GM plant and I have viewed the sites in question. I have reviewed the proposed remedies and I feel that GM realizes their past mistakes and is addressing the cleanup head-on and above board. I feel that they want to eliminate the environmental use and this is one of their top priorities. GM and its 300 employees are an integral part of our community and our county and as a legislator, I am called upon to make some hard and tough decisions and I just ask you to make balanced decision on these proposals.

Thank you very much.

GEORGE PAVLOU - Let me stand up because I have been getting some complaints because I am only asking a few from this side. I'll be asking, I am going to be standing up because probably I can't see people who are raising their hands from this side. Yes Sir. Also there are some people who have written statements, but they are not submitting their statements to the stenographer for the record. Please do so if you haven't done it.

RENE HART - My name is Rene Hart. I am the Financial Manager of the Central Foundry Pland and a Town Councelman for the Town of Massena. I am a lifelong resident of Massena and have worked

for General Motors for almost 25 years.

As Financial Manager, it is my responsibility to manage financial matters for the plant. I have reviewed the EPA's Proposed Plan which would require the Massena Plant to spend $138,000,000 without considering the additional industrial landfill cost. After reviewing the EPA and GM plans, it is my belief that the problems resulting from PCBs can be eliminated the the GM plan. The GM plan is safe and financially sound. The GM plan will protect fish from PCBs by eliminating their exposure to the sediments in the cove. This will be accomplished by covering the contaminated area with 4 layers of cover. You can depend on General Motors to resolve the environmental issues and to do what is best for all the people in the surrounding communities.

The General Motors Plan is sound because it addresses all of the areas of concern without completely tearing up the plant site and protects human health in the environment in a cost effective manner.

And to just briefly go over my script, it should be pointed out that the cost incurred for this project will not be taxpayers dollars. It will be General Motors' expense. Lastly, I would not, nor would General Motors sarcifice our human health or environment for jobs. What I am proposing is a common sense approach to be used by the EPA, the New York State Department of Environmental Conservation and other Governmental Agencies in

in resolving this problem.

Thank you for listening.

GEORGE PAVLOU - Thank you very much.

ED. LYNT - My name is Ed. Lynt and I am representing the Saint Lawrence Outing Club.

What I would like to address is what the head of the Foundry called a "carbon filteration technic" earlier. Now, the way I understand it, this process works, is that we take the PCB contaminated water and push it past carbon columns. Ions in the surface of the columns will exchange with the PCBs, the PCB molecules. And what you're left with is contaminated carbon columns. And what I would like to know is what General Motors plans to do with these columns and if they will be further delisted and the method of delisting will be, whether it's incerination on site or shipping the columns for treatment elsewhere?

GEORGE PAVLOU - Well, I believe at the present time, GM doesn't need to treat their waste water with the carbon absorption system which takes the molecules from the water column and adheres them onto the charcoal. They probably will dispose of them in accordance with EPA regulations, the State regulations at this point in time.

Yes, the lady first.

CHEETA LAZORE - My name is Cheeta Lazore and I am representing myself. I wanted to address one point specifically, well it could be two and it has to do with the dredging of the river and

contributory sediments. You call for a site, a silt curtain for minimizing the resuspension of the materials from the dredging and then on sheet pile curbing walls, if I am correct. Once those are in place it does not guarantee that that resuspension will not happen. Who then and it's not addressed in here, who has the legal liability? Who addresses that legal liability when that happens or when it goes downstream, past the Akwesasne or runs into the Canadian waters? Is it the EPA? Is it General Motors or is it the contractor? No where in here is legal liability addressed in the Proposal.

GEORGE PAVLOU - Certainly, we're going to try and minimize all the resuspended materials from going down stream. We do intend to do confirmatory sampling down grading from the sheet piles and the silt curtains to make sure that nothing like that happens and to follow these migrations until such time that we achieve 2 ppm in the level.

As far as liability, again you know, the goal of the Superfund Program is to allow the companies to do the cleanup utilizing their own money. If EPA is going to expend the money, then at some point in time, we're going to seek to recover our money from the company.

CHEETA LAZORE - But that to me, doesn't address the problem. You were directing the EPA and the United States Government is directing them to use that action, specifically according to what you showed that was the highlighted action to take. And if that

is the case, is there another way to prevent that? Is there another process that can be done, you know, in order to prevent that?

GEORGE PAVLOU - We'll certainly address that during the design phase and we fully intend to speak to authorities on dredging and the Corp of Engineers is certainly one of them, to see if there is anyway of doing it without causing, you know, further damage to the river. I am not sure if I am answering your question.

CHEETA LAZORE - Well, is the EPA, do they have to get permitting from the Corp of Engineers?

GEORGE PAVLOU - No. In terms, the law is very specific that whenever we do remedial actions at any superfund site, we have to meet the technical requirements of any permit, we we don't need the permit as long as we achieve those technical requirements. So if the County or the City or the State requires certain permits from us, we don't have to go into the administrative procedures of obtaining one, as long as we certify that we are going to meet the technical requirements of that permit.

CHEETA LAZORE - Thank you. I am not sure if you answered everything, but I would like to see the legal liability addressed.

LILLIAN JOHNSON - I guess when you're asking about the liability, you're saying if we direct an action and that action causes further migration of the contamination, then if we hadn't directed any action, it would still be the responsibility of the

company to follow the contamination as far as it goes. So we try and have remedies that incorporate some mitigative measures so that further contamination would be reduced. In the worst case, example is, say we directed a company to excavate contaminated material from an old landfill and put it in another state, dispose of the contaminated material somewhere else, then that landfill became another Superfund Site, then probably the original company would still be liable. I mean, that's the way that it would work, but we're all going to try and mitigate those things from happening. Our technical people would tell you about the percentage of effectiveness that they would expect from those kinds of measures if they were installed like the silt curtain and sheet pile wall.

CHEETA LAZORE - Ok. Who provided the Directors in the dredging part of the plan? Was it EPA or General Motors itself?

GEORGE PAVLOU - As I mentioned at the beginning of the public meeting, once we sign the Record of Decision that selects the remedy, we're going to be engaged in negotiations. We certainly notify a company that we selected this remedy and we would prefer that they implement, the law allows us 120 days for the moratorium period in which we're not going to take any remedial action. Those 120 days are split into two parts. 60 days for the company to respond and offer what we call a "good faith" offer to us that they are going to implement it; and 60 days for us to negotiate with the company and reach a solution for the

implimentation of the plans. If we do not reach an agreement with the company, then it's EPA's intention to expend public money and do it and seek to recover it later on from the company.

CHEETA LAZORE - Ok, thank you very much.

J. C. MC CANN - I represent students for Environmental Awareness from the State University of New York in Potsdam. We strongly support the idea of a permanent solution to the General Motors site and that is the proposition that EPA has recommended. We wish to emphasize the importance of a permanent solution to reduce the PCB levels to as low as technologically and financially possible. Since this site will set precedents for further and future Superfund cleanups, we strongly advocate a permanent solution of the entire GM site, not capping, not hiding or other such ineffective methods. This will result in improvement of the environmental conditions which will benefit all living organisms and future generations.

Thank you

GEORGE PAVLOU - I would recognize the gentleman who is sitting down.

JOHN MONTANA - I am John Montana. I am here on behalf of myself this evening. I would like to speak about a few areas on the site.

The St. Lawrence River Sediments. The choices which face us are currently dredge and treat or cover and explore in-situ degradation. I believe that the construction of a physical

barrier around the contaminated sediments should be required no matter which ultimate remedial method is selected. Along with this measure, the outfall currently discharging into this area should be rerouted to discharge outside of the contained area.

Construction of the retaining wall, might be a sheet pile wall or some other physical barrier and more or less impervious to water. It would serve several functions. First, it would contain sediments to allow in-situ biodegradation experiments prior to more intensive management methods. Secondly, it would insure against sediment movement associated with storm events, naturally occurring storm events. Three, it would issolate the bioda to a , not total degree, but a large degree, from the surrounding river environment, and fourth, the containment device would be in place in the event that future dredging is eventually employed. Once the physical barrier is constructed, a period of time should be devoted to testing the ability of in-situ biodegration to bring the sediments down to 2 ppm or lower PCB. If after this time, the 2 ppm is not achieved, the sediments should be dredged and treated with thermal destruction biotreatment or chemical treatment methods to achieve this level.

Though I am skeptical of containment using a graded filter as an ultimate remedial method. If the in-situ biodegradation experiment does succeed in bringing remaining levels down close to 2 ppm and it can be shown that the graded filter will then present a risk from residual contamination at a level as low or

lower than simply leaving the uncovered sediments at 2 ppm, then I think the case could be made for a containment with in-situ or graded filter. Excuse me.

I am a bit troubled by the fact that the Preliminary Remedial Action Plan portrays the river sediment problem as a simplistic either/or choice, either dredge and treat or contain in place. I would hope that the record of decision would specify an approach which is more performance based and phased in over a period of time.

It is important, I believe, to perform both scale field testing of in-situ PCB by biodegradation. If successful, it could radically involve the approach technic as other PCB sites and ultimately result in a safer lower cost solution. But such experiments must be done in an area which is as isolated as possible from the rest of the environment in order to control variables and guard against accidental releases of the sediments. In the event that in-situ biodegradation cannot remediate sediments to the desired degree, a backup plan which minimizes export of PCBs via sediment and bioda must be implemented.

Groundwater - I favor the installation of a groundwater recover monitoring and treatment system using a wall and trench approach. Clearly, regardless of what else is done on the site, such a system will offer a measure of protection and early warning of pollution movement.

Industrial Landfill - The landfill should be capped with

a compsite cover as described on Page 8 of the PRAP. At specified points in time, an assessment should be made of the quantity and quality of leachate leaving the site. If, at anytime, the groundwater monitoring and recovery system shows PCB levels equal to or greater than those which currently exist, or if applicable, future groundwater standards are controvened, the landfill should be permanently remediated, using any suitable methods that will have the effect of achieving the stated soil cleanup guide line levels.

Lastly, I would like to speak about in-situ soil decontamination. Not river sediment decontamination. I think it is also important to test in-situ soil biodegradation should be tried and this is not explicitly laid out in the PRAP, but due to the potential for future sites, this method should be explored. I am not proposing it as an universal sollution for all the sediments on the site, merely at some test site on the property.

Thank you very much.

GEORGE PAVLOU - Thank you Mr. Montane. As far as the in-situ treatment for the sediments are concerned, we are not presenting it as black and white or, you know, dredged or not dredged. We simply believe that that presents the greatest risk to the environment and to human health and we need some excavative removal of the sediments as soon as possible so the ecosystem can begin revitalizing itself. In terms of how long it's going to take to prove that such a treatment works in the river

sediment. It is my opinion that that answer may lie down 3 or 4 years from now. So, you know, we don't have that luxary of waiting and testing for such a long time.

I would, I am sorry. I am trying to do my best. Please, you know, bear with me. I'll recognize the lady with the blue shirt.

HILERY OAK - My name is Hilery Oak and first off, I would like to thank the EPA for working on this site, and cleaning it up. I know it's a yuckey job and I am glad you're going to do it.

I do urge you to treat the site and carefully, as thoroughly and as permanently as possible. Don't put it off because whatever we don't do now, we'll have to deal with later and covering it, capping it, is kind of like saying, well what you can't see, wont hurt you. And I think it will hurt us sooner or later because it's not a question of cost effectiveness and I say this to GM and to the Mayor of Massena. It's not a question of cost effectiveness. What's more important, dollars, or people or the earth? What is more important and I ask each of you involved in this decision to ask yourself that question every time along the way. What's more important? The people, I hope you say the people. I have a couple of questions in addition to that question which is not a thetorical question. I can't stress that enough. I am concerned if you do incinerate the remains, garbage, what does happen if you burn it? What's released into the air?

GEORGE PAVLOU - Well, we believe if we incinerate the soils and sediments that have PCBs on them, we would safely destroy the PCBs using an efficiency of what we call 6 nines, 99.9999 percent and any air emissions that would be coming out of the incinerator would be meeting any applicable State or Federal standards.

HILERY OAK - In addition to the incinerator , the ash that comes out of the incinerator has to be like 99.9999 percent free of what went in, that material then runs back into the site, and you don't think that the soil that's emitted is going to be harmful to that degree?

GEORGE PAVLOU - Well, I don't know what you mean by harmful, but it certainly meets any criteria of regulations that we have right now that represents the safest, you know, level.

HILERY CAK - And what is the result if you biodegrade it and have there been experiments?

GEORGE PAVLOU - There have been some tests for biodegradation at this point in time. Some of them show promises. Others show that they certainly wouldn't meet our goals of achieving the cleanup levels that we propose. So it's a mis that, depending on what kind of biological treatment you're proposing. That's why we are recommending that we perform treatibility studies to make sure that the soil that we have at the plant or in the rivers will be amenable to biological treatment. There is no definitive answer at this point in time. It's an innovative

technology. It could work at this site. It could work at some other site, but you know we have indications showing that in certain areas, it doesn't work.

HILERY OAK - And I have one other comment. I urge you to set your standards at least the lowest possible thing that can be achieved at this technical feasible, to reduce the ppm to .1, I urge you to do that in every instance. There's no reason to leave it around just to save ourselves some dollars. I think we are all going to pay for it later.

Thank you.

GEORGE PAVLOU - The gentleman with the green.

STEVE MATSON - I am here as a concerned citizen of Massena, UAW Member and a GM employee.

I would like to set the record straight on the tests or the workers working with a PCB hydraulic fluid. I have worked with PCB hydraulic fire resistant fluids for approximately 26 years. The UAW and General Motors work in conjunction with the New York State Department of Labor. No, the New York State Health Department to randomly sample our members for PCB dontaminents in the bloodstream. We have got a standing order in the plant that anybody at anytime working in the plant can request to be sampled for blood samples and they will be given that blood sample. We are working at trying to find other tests that may show whatever damages could be in the human body. We haven't been able to come up with anything but the blood test for now. But all

members sampled at that time showed the men with minimal amount of PCB contaminents in the bloodstream.

GEORGE PAVLOU - Thank you.

CHARLES ROMIGH - My name is Charles Romigh, St. Lawrence County Legislature.

First off, I would like to commend all the parties involved in this. It's a very serious problem. But hopefully, by communication, we will get it solved. The one problem that I have with this, thank you for the material I picked up tonight. Right now, I have to support the GM Plant. Simply, I am reading your material. Both you and the Native Americans seem to prefer excavation, but I notice the disadvantages of that. According to your words, are, it increases the potential for the spread of contamination and also excavation could cause trapped organics to be released into the atmosphere, which also like Mr. Ransom mentioned is the incineration issue. It is something that I would prefer for the time being. This is something that we're going to have to work at. It's not going to be done, you know, in 3 months or probably 5 years. It took years to find out that PCBs caused the problems. Likewise, it's going to take us years and hopefully some of the young people that are working at the colleges will come up with some of these chemical or giological answers to eliminate these problems. Right now, I would, I personally would sooner see something contained to the best of our ability to make sure that it doesn't interfere with any,

the water, the fish or the people.

I don't like the idea of opening up Pandora's Box per se and excavating it and not knowing exactly what problems we could cause. Simply because, like you people say, then it puts some extra burden onto not only GM, but the taxpayers and the people. You know, not only the Native Americans but the people in the vicinity and our friends to the north.

Thank you.

GEORGE PAVLOU - What we did try to do actually with our handouts and the risks assessment was to find a balance. The risks associated with excavation, what they call transient risks with no permanent treatment and you know, we try to portray them as objectively as possible.

DWIGHT TUINSCRA - I represent myself.

One of the things that I hear people saying is that the more expensive cleanups will hurt GM. GM is a good cooporate neighbor. Let's be nice to them and not ask for these expensive cleanups. Perhaps we will lose business and perhaps we will lose jobs. I am not willing to accept that arguement on the face of it. What if everyone in this country said, "we want the cleanup that will best remove the problem. We want everything clean"? What if everyone said that? I am hoping we can perhaps start a trend like that here.

Maybe companies will have to charge more because it will be more expensive for them to operate and cleanup from the effects

of test operations. Consumer goods may be more expensive. Maybe we'll buy less of them. Maybe it will be good for the earth. Let's try to set a precedent here. If we're worried about the loss of jobs, let's not cut ourselves out of a good future. Let's try to communicate our vision to other communities so they can ask for the same thing.

Secondly, in the criteria that is used for selecting or disposal or your remediation technicques, there is one that seems to be missing. Perhaps the law does not write it in, but that would be applicability to nearby sites. If you decide to incinerate, very well and good, but there may be now or in the future, need for incineration in the nearby sites. They are as polluted perhaps as the GM site, and sooner or later as the gentleman from the Attorney Generals Office pointed out, we will have to deal with that. I get the feeling that this is a bit of a pilot project for this type of endeavor. So let's make sure that you do it sensibly so the answers that have come to GM can be applied to Alcoa and Reynolds.

Third - And lastly, I noticed that a lot of people have spoken up for GM because their lives are connected with that company. I would like to speak up for the Mohawk Proposals, in that I can't make a recommendation on a technical sollution. I don't know them well enough and I probably never will. The Mohawks are very concerned. They live next door to the site. Their lives are effected by it more than anyone else. They are

also internationally known for there expertise in these matters. Let's listen to them. Let's listen to what they have to say.

First of all, they do want a good cleanup, I'm for that. And there's a precedent that no one here has articulated that would be established if you did that and that is, we should listen to the people next door and the problems. We should listen to the people for being most effective because some day, it may be that a Superfund Site crops up next to my home or next to your home and in that case, I would want to be listened to. You would want to be listened to. Perhaps it would be next to your children. You would want your children to be listened to. So let's push the technology for treatment. Let's solve the problem permanently. If we do that, perhaps Massena, as the Mayor expressed his concern, will not be seen as a chemical dump or as a chemical waste land which is erroneous for anyone to see it that way. But perhaps Massena will be seen as a leader in restoring the environment that the citizens have to live in.

Thank you.

GEORGE PAVLOU - In terms of your comment, let me reiterate the fact that EPA as well as the State of New York have issued administrative orders to both Reynolds and Alcoa and they are in the middle of studing the expanse and nature of contamination on their premises as well as to the adjacent ECO System and these are our intention of some point in time to address the areas as one entity in terms of cleaning it up. I mentioned in my

opening remarks that the EPA did recognize the sovereignty of the Tribe and as a matter of fact we do recognize them as being via effective community in terms of the contamination. That, you know, they are less than 1/8 of a mile from the site and some of their land has been contaminated. I believe the Tribe has been the recipent of a technical assistance in a grant with the EPA. As a matter of fact we have the only memorandum of agreement in the country, I believe, with the tribe and the regional office of the EPA. Let me recognize the gentleman with the green shirt. Right next to the mike here.

DUANE HAZELTON - Thank you. My name is Duane Hazelton, the Massena Town Supervisor. Also, I am a retired employee from Reynolds, having worked there for 30 years, and am familiar with any of the PCB contaminants. But as we look around and as we talk about the different things and we can also look at the sun that causes cancer and so we can't live in a dark room. And we do have to become realistic. We would all like to say that we do not care how much it cost or what the overall economic impact would be, but again, I am saying we must be realistic. PCBs have been in existance for some 30 years. GM has already spent 30 million dollars, at least, to correct the problem and are proposing to spend another 37 million.

One of the cleanup proposals called for is excavating of the landfill. Now, to excavate the landfill with what reason it would fulfill and I do not know, because this landfill could be

actually one which, why you service a secure landfill that is properly covered. One thing that I could see, is and more secured, you could put it on this present landfill because people do not, there is no reason for people to be there, and children don't play around there, but it could be further, security could be placed around that.

The overall GM Proposal is cost effective and granted the EPA Proposal might say, I'm trying to stay in a jovial mood, maybe the Cadillac proposals and granted we would all like to have those, but I would hope that there is some medium that can be reached so that everybody can be granted relief or whatever and also, you know, we're all looking to the future and hoping that it also takes care of our children and we do not want to see the land. But I ask that the cleanup be done with regards to the present and the future existence of industry in this area. Economics does play a role in achievement along with correcting problems. For example, let's not excavate a landfill and an industry, but let us secure both for a better environment.

Thank you.

GEORGE PAVLOU - As far as PCBs are concerned, we do have insufficient data, but we do label them as probable cancer causing agents. In our proposed remedy, we are not proposing to excavate the industrial landfills. We are essentially showing you what are the risks associated with various options. If we were to cap the landfill, we would have a certain risk. However, it's

going to cost us so much money. If we were to excavate and remove and treat everything from the landfill, it's going to cost an enormous amount of money. So we laid out everything to the public so as to understand the delemia that we are in at this point in time before we can propose a remedy for it.

BONNIE PLOKEINCER - I have a few comments, but first of all in regarding the last comment, I would like to know if that landfill is secure and what you mean by secure?

GEORGE PAVLOU - Well, the landfill right now has an interm cap on top of it which GM, I believe, they completed this in 1987 or '88, I forget which year it was, they completed the capping on it. But it doesn't really fully comply with what we call the regular requirements. You know, having 3 feet of clay and a synthetic membrane liner and the rest that, you know, the hazardous waste regulations that the RECES Recovery Act requires.

Now the reason that it was labeled, you know, as interm, I believe it was the recommendation by the State of New York that we cover the landfill so that we could prevent any volatilization of the PCBs from occurring.

BONNIE PLOKEINCER - It hasn't been seeping into the river from the landfill?

GEORGE PAVLOU - I'll let Lisa answer that.

BONNIE PLOKEINCER - I just wanted to point that out. That's why I wanted to know what you mean by a secure landfill.

LISA CARSON - In general, when we use the word secure, it has a

very special meaning. We have laws and regulations that say how a landfill has to be built from the ground up. The General Motors landfill doesn't have a liner back then and I don't suppose those landfills have one that are in existence, and so it souldn't be secured to us. But in terms of is there leakage from the landfill, we have wells that look at groundwater, slow off the landfill, would show some low level PCBs. It's an issue that came up in a recent technical meeting where we'll be looking into it more before we propose a remedy for the site. But there are wells that showed some very low levels of PCBs coming in the groundwater because the landfill is so close to the river.

BONNIE FLOKEINGER - This has been stated before, but I just wanted to show my concern for incineration and emissions that come out of the stacks that are burning PCBs and also, I'm concerned about the levels, cleanup levels, of PCBs and I would like to see them developed a little lower, and the last point that I have is that I think that we have to stop pointing the finger at other people and that this is a serious problem and when we start criticizing other people, we get away from the issue, and that we should start working together and not be judging other people whether it be Indians or industry or agencies.

Thank you.

GEORGE PAVLOU - I've got to ask somebody from that side.

HOLLY CHAMBERS - My name is Holly Chambers and I am representing myself.

Mr. Hazelton earlier asked why excavate. Well, I think an answer to that could be especially regarding industrial landfill, the answer to that is that if we don't excavate and deal with it now, we have in effect a Pandora's Box in place which is going to, in 10 or 20 or 100 years down the road, going to almost certainly present problems for us. The fact that they put on a cap which is rated perhaps at 10 or 20 year lifeline, is no guarantee of safety past a certain limited rated period.

I don't happen to have children, but I'm really concerned that future generations have a safe environment.

A second point, I think that the Mohawks have the right idea in that wherever it is possible that we go down as far as possible in the levels of PCBs that are allowed to be in place. Finally, I would like to point out the issue of the increased health risk with the excavation of the industrial landsite has been brought up several times as a reason why we should not excavate or that should not be an option. But Mr. McClelland gave a few example of how the health risk if you perhaps manipulate the numbers and could change them around, you certainly get that assumptions, can be made to look quite different. So I think that the issue of the increased health risk is not as cut and dried as it might appear. And I would also like to agree with people who have previously spoken in favor of increased, looking at the kinds of options.

GEORGE PAVLOU - Let me also state some of the constraints that

EPA faces in terms of selecting remedies. The law does not prevent us from containing sites. If the cost of excavation and treatment are prohibitive, it certainly allows for that option as well, without necessarily meaning that we are going to contain the site and never revisit it. It also allows us to revisit that option at least once every 5 years to make sure that it works. As far as, you know, achieving the, you know, lowest possible levels in terms of cleanups, certainly it is the intention of EPA to try and achieve, it is an admirable goal, let's put it this way, but we face certain obstacles in doing so, maybe in terms of the technology, maybe in terms of the practicality of trying to achieve these things. But, again my constraint is that EPA has to select remedies that achieve acceptable risks. We cannot eliminate risks, but, you know, our mandate is to achieve a remedy that would produce a risk that is acceptable for humans and the environment.

Yes Sir, standing up there.

DONALD SMITH - My name is Donald Smith. I am a St. Lawrence County Legislator, also a member of the Economic Development Committee. I have been a lifelong resident of St. Lawrence County. My district is Louisville and Waddington which both towns are on the St. St. Lawrence River, but I have a great love for the river. I am also a retired General Motors Employee for almost 30 years and with my 30 years at General Motors, I visually watched how GM would attack environmental problems, and the big

air problems and any problems that come up. General Motors didn't sit back, they attacked them, now that I have listened to both programs presented twice, I would say, I still look up to them having trust and faith and also the importance of doing what we want to do to help General Motors with economic conditions.

I would support and urge you people to support their remedial cleanup package instead of EPA.

Thank you.

GEORGE PAVLOU - Thank you Sir.

BARBARA DOE - My name is Barbara Doe. Because of my environmental background, I am hoping my input might be thought provoking.

First of all, the man from UAW, is it my understanding that he is still handling PCBs? I thought they were banded in the early '70's?

GEORGE PAVLOU - I don't think he meant that. I would think the recent introduction to PCBs, maybe what he meant was that he handled specific contaminated oils or soils. I can't speak for him.

BARBARA DOE - Recently, I now that DEC said that what was coming out of the waste treatment plant, had more PCBs coming out than what was going in and so I would have to question that. Are they still using PCBs in Massena?

LISA CARSON - General Motors is not using PCB oils. They quit using PCB oils in their processing for that. They don't even use the equipment. They used to use the PCB oil. However, they

have drains underneath their plant and they have piping in their plant and because they used PCBs for so long, there are PCBs still in those lines. So what General Motors does is get the material out those lines, treat it and remove the PCBs and they now take those PCBs outside to a legally permanent facility and they have to dispose of them. And so they recognize that there is still residuals in some of their lines, but I don't believe the workers come in contact with that material.

BARBARA DOE - The other thought on PCBs, it is my understanding that once you have the river bottom sediment, PCB problem, there is actually no way of getting rid of it because they recycle themselves. They come up in the air bubbles in the river. They drop back into the autmosphere and they come back in rain. Are you familiar with that?

GEORGE PAVLOU - No, I haven't heard that.

BARBARA DOE - Alright. The other input that I would like to have is on a secure landfill. Any recent news letters on hazardous waste news, they claim that there is no such thing as a secure landfill because of ground level, lightening strikes which are quite frequent and they have documented cases where lightening strikes the ground, say in Florida, they have actually made a hole in the ground, melted the sand and penetrated the ground to a depth of 15 feet.

GEORGE PAVLOU - Well, in the terms of the useful life of landfills, we believe that they can last for as long as 30 years. In terms

of containing a site and capping a landfill, as I mentioned before, we are not going to walk away from it. We are going to have what we call "operational maintenance" to make sure that we install their remains valid and viable, you know, for the duration of the project.

BARBARA DOE - Well, I think it's a serious, serious situation and I do hope that everyone involved, you know, really studies the problem and handles it to the best of their ability.

Thank you very much.

GEORGE PAVLOU - Thank you.

BOB FRANCIS - I am Shop Chairman of UAW Local 465. I represent the hourly employees who work at Massena, and so that anything that can effect the plant employees is important to me.

I have also grown up in this area, Fort Covington, and went to school in Salmon River and some of my family still lives in the Fort. I reside in Massena. This is a wonderful place to live and work, and to keep it that way, I know that we need to act on the PCBs and other chemicals in the St. Lawrence River area.

My management counterpart, Ben Scherschel, has outlined a cleanup plan for the site that makes sense to me. It is safe for employees, and protects people who live in the area by containing and treating PCB waste. If fish and wildlife are not exposed to the PCBs, you reduce the chances of PCBs being picked up by humans.

The GM Plan for PCB materials on Mohawk lands says something about GM people. PCB materials ran off onto the Akwesasne land by accident years ago. The source of the runoff has been taken away by GM so that is can't happen again and with further remediation that has been explained.

Now, as part of the cleanup plan, GM wants to get in and replace the PCB soil on the Akwesasne land with clean earth. It's hard to eliminate PCBs altogether, but they can get it down to one part per million, which is much better than what they have to do by law. I like the GM plan because it is engineered for the Massena Plant site. Each area that contains PCBs has a plan designed specifically for it. In each case, they try to do what's right to protect the people, the community and the environment. Also, I like the plan because I am confident that GM management will do the things it says it will do.

As many of you know, the plant is operating under a survival plan mode. Labor and management share leadership responsibility with a goal of continuing plant operations here in Massena. We look together at all the so-called nuts and bolts of the business, and we count every penny together. This is a change. When you do that for many years, you develop a trust in one another that has helped start to turn our plant around and our future.

You may be aware, and just a note that Central Foundry Massena has recently been released to produce 100% of our

customer's need for lost foam aluminum cylinder heads. They gave the business to us, and took it from a foreign competitor who wasn't as good as we were. There were people who felt that we couldn't do it, but we did it.

When there is a problem at the plant, labor and management work together to take care of it, and we will work together to take care of the PCB problem as well. The GM plan to cleanup the plant site is a good plan. I hope you will approve it, and at least, give it much consideration.

Thank you.

GEORGE PAVLOU - Thank you very much. The gentleman with the blue suit.

FRANK ALGUIRE - My name is Frank Alguire. I am Director of the Massena Economic Development Council, a position I have held since March of 1988. I have environmental background as well. I received my Bachelor's in Environmental Studies, Minors in Biology and Earth Sciences, Master's in Regional Planning in Environmental Concentration, a course in Environmental Biophysics. I have some understanding of these issues that we are talking about.

My overriding concern here is the health and environment in Massena at the GM plant site, the community in general and our neighbors.

I have been fortunate to have the opportunity to be continually involved with General Motors over the last couple of years

as they looked at their problems on the site. I have tracked very closely what they have been doing. I have been impressed with the scientific impartiallity GM has required of their consultants and they've really more or less left them to their task and insured that they worked in a scientific and objective way. I have also been impressed with the things that GM has been allowed to do in terms of environmental remediation and some of the things that they have been able to do for some of their neighbors during these studies. More than that, though, I have really been impressed with the sincerity and the commitment that General Motors and both Management, UAW and the Associates have shown towards dealing with this problem.

There is no question that PCB remediation ia s complex issue, and I think we all know that. There's a lot of questions that still remain unanswered. PCBs themselves are not all alike. For instance, we know that 1260 PCBs are dangerous, but we're not really sure if 1248's and 1232's are, or, if they're dangerous at all. But then EPA considers all PCBs to be 1260, and tests them all the same. Without the importand knowledge of toxicity of degraded PCBs, 48's, 32's and 21's, I think it seems premature to require certain remediation efforts. Of course, there's considerable experimentation going on concerning not only the risk represented by various PCB molecules, but also the risk represented by various PCB remediation techniques. These seem to have been going on for a couple of years and I'm sure into the future.

I'm sure that Massena is going to play a role on how to look at these things into the future as well.

Along with the complexity of the PCB issue, we find an overwhelming alarmist approach to these issues by environmental groups who have learned how to use the media to get their anti-industry message across, regardless of what might be said. It is my firm belief that Massena is not a hazardous waste dump that needs to be cleaned up. We don't have, we're not an environmental waste land and we're certainly not a love canal in terms of toxicity. We don't know about toxicity for some of these PCB molecules. Rhetorical comments only serve to confuse the specific issues to a point that make it extremely difficult for a factual, scientific and objective approach to the issue. We need to, if we can, separate emotion and politics from our task at hand.

I was certainly pleased to see that EPA and GM agreed on a number of remediation techniques. I've looked at both proposals in detail. Nevertheless I have concerns with EPA's proposal for incineration of PCB bearing materials on site. My concern is not whether it will do the job. My concern is that incinerators are hot topics today all across the country. No one seems to want an incinerator, they don't want it within 100 miles. It is my firm belief that the permitting process for such a facility would never get built. We see this sort of process happening today with all sorts of projects. Certainly a lot of them are

much more benign than PCB incinerators. If we look at this proposal from a practical versus a theoretical base, we cannot dismiss existing anti-incinerator reality. We have a good amount of that in St. Lawrence County now as it is.

O course, other remediation proposals which would rely on the availability of such an incinerator would be questioned from that basis. EPA remediation proposals for major excavations and dredging of PCB containing materials in my belief pose environmentally unacceptable PCB mobility risks, both downstream in the river and with the prevailing westerly winds, eastward across the land. It is my belief that given the heavier than water, and from what I understand PCB molecules are heavier than water. They don't float to the surface and go up through air bubbles. They are heavier than water. They stay in place once they're in place. Given the documented degradation of 1248 molecules out in the river to less toxic 1232's, we would be much better off to leave these relatively large quantities of PCB bearing materials in place, improving containment in the best known way, and institute a rigorous program of monitoring movement as well as further chlorine degradation within the PCB deposites.

Thank you.

GEORGE PAVLOU - Thank you. Let me restate the fact that, indeed, GM has been very, very cooperative and responsive to the Agency and to the State and to the Tribe in terms of, you know, conducting the study and I would restate that. In terms of the PCB

molecules 1260's being the most toxic indeed, you know, that's true and EPA is using that as the medium for which to judge all other PCBs. However, we are at the side of conservatism and safety. In terms of incineration and permitting issues, again let me restate that we are not required by law to obtain any permits, go through the administrative procedures of obtaining permits as long as we meet the technical requirements of the permits.

I'll recognize the gentleman.

JIM TOTH - Thank you. My name is Jim Toth. I have been raised and reared in Massena, a native of Massena and I have been employed by the GM plant for 20 years. I am an Engineer by degree and I have worked at various engineering areas at the Massena Plant, although not in the environmental areas. During the past 20 years, I have been associated with many building additions and plant layouts. I am aware of large sections of roadways that have been deposited in the east disposal area that was previously discussed. Based upon my background, I feel I'm capable of evaluating plans from a technical perspective. After reviewing the data, as presented, I have concerns for the following areas:-

Dredging in the river will most likely cause resuspension of sediments. Capping the East disposal area will keep PCBs out of the groundwater. Groundwater recovery wells make sense and that of protection since any water passing through these well will be sent through water treatment.

The EPA's Plan for extensive excavation and incineration, in my estimation, will increase the health risk for cancer risk in the area.

In conclusion, I urge the EPA to favor safe and effective plans for treatment and containment and reevaluate the GM Proposal.

Thank you.

GEORGE PAVLOU - Yes Sir.

ANDREW LOPATA - My name is Andrew Lopata and I am a resident of St. Lawrence County.

GM does not care about its workers, the Mohawks, the community, or the environment. They are a Corporation. Profits are their bottom line. If the community benefits in anyway, by GM, it is merely coincidental. They layoff people here while building plants in the third world where labor is cheap and pollution laws are lax. The Mohawks are hit hardest by GM irresponsibility. Covering something up does not make it go away. If this site isn't cleaned up permanently, we are continuing the genocidal policies of our ancestors towards the natives of this land.

Thank you.

GEORGE PAVLOU - Thank you Sir.

ED FAY - My name is ED Fay. I am a concerned St. Lawrence County person. I would just like to point out that GM, one of the longest lasting major corporation in this country, is very concerned with its employees, the communities that they are

involved in and when they commit to something, they generally get it done. They get it done right and they get it done fast. Why don't we let them do their job instead of getting all kinds of government agencies involved or we're going to end up with a bunch of $600 toilet seats.

GEORGE PAVLOU - Thank you Sir.

BRAD OAKES - My name is Brad Oakes. I am a member of the local community and I represent myself.

I would like to speak to the issues of cures for this problem. In the sense of incineration, we're going to take PCBs and change their form. Matter is not created nor destroyed, but we are going to take PCBs, and form dioxanes which will be and can be formed in the thermal oxidation process. In regards to that, we use precipitators, line scrubbers, what you want, but you still have the contaminents in that mechanism and no matter where you go, you cannot take care of it and sooner or later, you're going to have to treat it again.

In regards to the incinerator itself, if you look at the track record of incinerators across the United States, it's not very good in the sense of efficiency and in the sense of possibilities of blowing up which has happened. It caused many more problems and you're going to have that and having to retreat PCB contamination, the ashes that come out in the end is not going to be 99.9999 percent PCB treated, more than likely and at certain points it will be. But generally speaking it wont. It's

going to have to be retreated and then at that point it's hazardous waste, considered hazardous waste.

In regards to capping which has been mentioned several times, you're just sweaping dirt under the rug. Ther's no sense in regards to money. I know that it's very difficult in risk assessment to think, you want to spend the least amount possible and do a good job. But we are arguing about human's lives. We're arguing about the lives of fish and wildlife that people depend on, the whole network of feeding. You're going to cause problems if you don't spend the right amount of money. We don't want a good job, we want a really good job and we want it done right and we can't talk about money. If you want to talk about money, we have to start discussing the cost of how much it's going to cost for each fish. What is the value of the fish. What is the value of the land. We can't put a value on that. And incidently, in regards to a couple of comments that were made earlier, it's kind of difficult to raise cattle in an area that they die because of flourides.

Thank you.

GEORGE PAVLOU - On incineration and the fact, you know, that dioxanes and purines can be formed. Before we allow the incinerator to become fully operational, we intend to have trial burns to insure that what we are producing meets all applicable standards.

LORRAN THOMPSON - I am representing the family estate, the

Thompsons, adjacent to General Motors toxic dump.

I, too, am a resident, a lifetime resident of Akwesasne for years and before there was a General Motors. There use to be a beautiful farm where the plant stands today. We used to visit that farm often. It was beautiful. The bay that you're talking about used to be a bay where Racquette Point used to go to catch their fish.

You know the stories you hear before the non-indians got into this country, where there were so many fish, you could walk across the streams. Well I seen that. I use to see that in that day or you could just throw in a hook and pull out a fish they were so plentiful. You go there today, all you see is about 6" of muck. You don't see any fish in there. You see carp. In the late summer, you see carp and that's it.

We have family property and it's been there as long as I can remember. My grandfather, my father, my great-grandfather, we all lived there. A gentleman here said that we don't know how to use the land yet. My grandparents, my parents, we all made a living on that land. We all made a living off that river. We all made a living off that bay. Because of that General Motors Plant, we are not able to do that.

I lived a 1/8 of a mile from that dump. Every day, I have to come out and smell the air of General Motors. Styrene, who knows, who knows what poisons that I have to smell when I come out of my home. My child, my 7th child warned me with faulty

teeth. Her front teeth came on and two months later, they fell out. All her teeth, they are all metal. They all had to be fixed. My 8th child, we have to watch what she eats. We have to watch what she wears. She is allergic. Something that we're not accustomed to in our family, allergic. We're told that it is safe, they covered General Motors. You don't know the feeling when you look across 1/4 of a mile, 1/8 of a mile away, you see men working, you see bulldozers working and they are covered in white and they're all covered on the head, but the plant didn't tell you it's dangerous and all prevailing winds are right over your house. You call that responsibility? Where is the management there at that time? Where are all these experts that say "I know, I believe, I have the knowledge to say"? How come, nobody called us? Is it because we are only Mohawks? Is it because we're only two families? Is it because we only make $10 an hour? Why is it? It looks to me like I look over here and I look over here, it's the young and the old. The old are looking for retirement and the young want a good clean environment, but the old have the control. You know, it has taken mankind, how many decades, how many thousands of years to stand up straight, to be the handsome person, the beautiful people that we are, how long is it going to take your technology to cut the arms off of our coming generation? To cut the legs off of our coming generation, so that they wont feel what it's like to be able to walk on two feet; to be able to use two hands, your technology. That

is what it's going to.

We need clean air and we have rivers. Those rivers are the veins of our mother earth. You shoot dope into your veins everyday, you're not going to last very long and if we throw chemicals into our rivers everyday, we're not going to last very long. You say cover it up. It's a Band-Aid. That's a Band-Aid on a cancer that's going to destroy everyone, and you're talking dollars and cents. You look at your own family. When your wife, your husband or one of your children are sick, what do you say at that point as a family? Money is no object. Get her or him the best. Money is no object. Why is General Motors saying it's going to be costly. It's better if we just cover it up. I recommend, from where I sit, that it be cleaned up. The dump, the toxic waste dump which I played in when I was a child. The toxic waste dump that you say are responsible management. I see how it started. There's PCB allover that yard. It isn't only confined in that little hill that they put there. It's allover that place. I know, I played there. I spent a lot of time there. I spent almost all my life there. They used to put up signs. I remember. But within a month or two, the dump came so far that it was covered, the bulldozer covered it right over.

In a little while the kids were all playing up there again. There were never any fences around it. There was never any warnings. I seen barrels, big barrels, coming out of that place, corrosive, do not come in contact, corrosive, by the

truck loads buried up there. Not only PCBs. Dig it up. Get it out. Get it out of the way of human beings, animals. Put it in a place where living things are not going to come in contact with it.

I don't know if the incinerator is the answer or if it's not the answer, but my gosh, if you say that you have the expertise, then put it to work in trying to get rid of this stuff. Not just worry about your job and General Motors. General Motors wont exist if you have no people. Your grandchildren may not be able to work there because they are not able to. I can see that. I have lived there all my life. My family, my nieces, my nephews, our neighbors. And we're in a little different situation then you people are. We live on what they call a Reservation. United States made a law a few years back saying they are not going to make anymore Reservations, so I am tied down to where I am. I don't have the luxury of selling my property, hoping that who I sell it to, doesn't know what's going on and then moving onto a cleaner area. I can't do that. My land is worth nothing because General Motors made it worth nothing. My property is beautiful. It oversees the St. Lawrence River. My next door neighbor used to have strawberry fields as long as you could see. Raspberry fields as far as you could see, and it's long ago, 20 years ago, 25,25 years ago. We use to get 2¢ a basket to pick strawberries. Beautiful smell, strawberries. Nothing like styrene. Nothing like the toxic smell that you get from the processes that are

taken by General Motors inside the fence that they have around their plant. They have pools, swimming pools that are suppose to be working, suppose to be working to clean the water, but they are so full of sludge that they can't work and I know, I have seen them. I have been there. Not too many years ago. I am only one, but I have seen a lot there.

It's so swift on that curve of the St. Lawrence River, I wonder how you are going to cover it, but you say you're going to cover it. Very swift there. I would rather you dig it up and maybe some sediments will go downstream, but you will have gotten the larger part of the dangerous toxic chemical that you have put there, General Motors. If you were a neighbor to someone, and you throw garbage into their yard, you're responsible for cleaning up that garbage, not just to cover it up and say, "be happy". Dig it up and get it out of our way.

As Mohawks, we have no choice but to stay there. All prevailing winds are towards Akwesasne. All prevailing currents are towards Akwesasne. Everything is downstream. I ask you, taking those comments into consideration. We don't have much time. There's pollution all over. We need to move as quickly as possible. We use to have muskrats also in that bay. Ten years ago, they stopped trapping them. There are no muskrats left. There's three beaver left, but they're up further from the dump and the currents that come from their dam come towards the dump and so it doesn't really effect them other than the air. And those are

the comments that I have.

Thank you for listening.

GEORGE PAVLOU - Thank you.

WARD STONE - Lorran Thompson speaks the truth about the situation.

GEORGE PAVLOU - You will have to identify yourself.

WARD STONE - My name is Ward Stone. I am a Wildlife Pathologist for the New York State Department of Environmental Conservation. I have been in charge of that Unit for 21 years. I hold a new graduate and graduate degrees in Syracuse University in Zoology and Pathology. I went to National Navy Medical School. Published over 100 scientific papers and I have studied the situation up here for 5 years.

Beginning when Gretchin Cook, Midwife for the Mohawk Nation, asked me to comeup and take a look around because she felt that babies she was bringing forth into the world at Akwesasne were low birth weight and suffering birth abnormalties that might be due to the pollution. So I came up and I met with Chiefs and the Clan Mothers, the Thompsons and the first thing that we looked at to get an indication of whether PCBs were moving to the food chain were turtles. And we looked at them because turtles are simbolic to the Mohawk Nation because in their gensis the earth is formed on the back of the giant turtle and Gretchin felt that if I was finding turtles in other parts of the State with high levels of pollutents and they were being sickened that that might indicate that the very underpinnings of the earth

were coming apart. So we looked at a turtle and what was called the "unnamed tributary cove" which is the first cove below the discharge pipes from General Motors and adjacent to the uncovered landfill that was present in 1985. The landfill is still there, but has a temporary cap.

We looked at the turtle and we found over ppm of PCBs in it's far. A female turtle. That's a lot of PCBs if you look at US Standards for consumption of poultry. 3 ppm of PCBs or greater makes chicken unsuitable for human consumption. We looked at a male turtle and it had over 3000 ppm. It is sparsity in the data is due to the fact that female turtles have ways of getting rid of PCBs that male turtles do not. They get rid of the PCBs in their eggs each year.

Humans, human females have ways of getting rid of PCBs that human males don't. They put it in their fetus that they are carrying and they can transfer them in breast milk and that poses a problem because we found the fish and wildlife in the St. Lawrence River and Racquette River to be contaminated with PCBs and related pollutants making them unsuitable in human consumption. This threatens the very Mohawk way of life because even if we use the language, you need to carry out activities like hunting and fishing and trapping and gardening and crafts and that is threatened by the pollutions. It's really been cut back because of the pollution.

We studied on Thompson's land because the landfill was

uncovered and was still being dumped in in 1985 and 1986. And so we looked at small animals on the Thompson's land and we found high levels of PCBs. On that property, was clearly PCBs moving to the food chain. We found Shrews with up to 11000 ppm of PCBs in their fat. Now, this would mean that if you had 2.2 pounds or a kilogram of shrew fat, it would be over 11 grams of PCBs in it, that would give you a visible puddle, a large puddle of PCBs in your hand. Shrews are hard to find. We think they are being killed off at the top of the food chain in that terrestrial food chain by the PCBs and related toxics. But it was easy to find that there was lots of pollution escaping from the site and we found, in the cove, which Mr. Thompson was talking about up to 3000 ppm of PCB in the sediment.

Now, when I got there, Mohawk children were walking barefoot through those sediments, where I expect not too far in the future, consultants and workers for General Motors who will be dressed up in space suits. Boats were launched there and fishing was taking place. We found frogs that couldn't hop properly. We were out on the water one day and we noticed a frog that did not blend in with the bottom. It stayed a dark color on the light bottom and so we picked it up and brought it to shore and when it hopped, it always turned in the air and landed on it's back. It could not right itself. We looked at it. It had very high levels of PCBs in it's central nervous system. Now, although there are no controlled experiments at this point that

have been done on lethal levels. They are even higher than you see in birds that die from PCBs and we thing that the PCBs have a lot to do with the abnormal behavior and lack of frogs in that cove.

Now, this brings us to the extensive contamination of the cover in the St. Lawrence River with PCBs and I must point out there is no comprehensive study at this point done by General Motors to identify the extent of the PCB contamination from their plant in the Racquette River and certainly not in the St. Lawrence River. Therefore, there can be no accurate measurers of the quantity of PCBs to be removed from the river. There is only a small study that has been done.

I take issue also, the cleanup level that has been put forth in this case by EPA, two ppm. Scientific literature shows that if you have levels of 2 ppm in the sediments, you can expect the food chain has considerable contamination in sensitive species like mink who will not be present. They will be killed off by the PCBs moving through the food chain. You will also not be able to reach your goal of having fish and wildlife that are safe for other fish and wildlife to consume in the food chain. Nor will the Mohawks be able to freely use the fish and wildlife as a protein reasource. Therefore, it seems to me that the Mohawk level of 0.1 ppm for sediment cleanup in the St. Lawrence River is the reasonable one to go and one wonders what hypocrisy the Federal Government is using when they allow a tenth of a

paft to remain in cleanup in the Racquette, but a 2 ppm in the St. Lawrence. That is a very strange comparison especially when you consider that the St. Lawrence River is a more important fishing and hunting area. Also, it's illogical when one considers that the Mohawks have been utilizing the Mohawk River or the St. Lawrence River for thousands of years for fishing and hunting as a source of protein and very intensively at Akwesasne for the last several hundred years, and Cornwall Island, a major population place for Mohawks, is entirely surrounded by the river and utilized heavily by fishermen from there and duck hunters and it is clear that the 0.1 ppm ARAR is what should be used and what is necessary to protect the fish and wildlife and the Mohawks that are going to eat it and to pllute the whales that are further down that eat the fish such as the eels that come up and pick up PCBs and go back down the river.

So I urge you to go with the 0.1 ppm. Certainly something much lower than 2 and you also have to make sure that General Motors identifies the PCBs that they are responsible for downriver and the light sampling that they have does not do that. What you have done is something very much in favor of General Motors at 2 ppm and allows them to escape cleaning up areas that they should indeed have to cleanup. And unless you have the extensive sampling done before that, you are going to miss hot spots altogether. We don't have a good record at General Motors, and I've been here 5 years, the EPA was here before, the problem

has moved very slowly. We need to speed that up and we need scientific action, a plan that reaches the objectives that we set. The dump should be permanently remediated and is only a temporary cap really on it at this point and PCBs are still being washed from that dump through the groundwater by the evidence that we have from groundwater sampling and there is no up to date study on what's going on there, even on the runoff of surface water. And so the loss of PCBs may well be greater than we even estimate at this point and the wildlife pathology that will be taking a look at the surface water there, especially since we found leakage at the O1 discharge into the St. Lawrence River recently which has been repaired hopefully, but which was not supposed to be taking place. And the Racquette River still has a discharge of PCBs to it, to that discharge from the plants to the river even though it's supposedly sealed off. It still has PCBs going in.

So we need to speed things up there and if we don't do that, the situation will continue to get worse for the Mohawks. But cleaning the river backwards also, we should be cleaning from Alcoa down the Grasse, Reynolds and then General Motors. We've gone about this whole process in a backward fashion and we should have a comprehensive study up the river and find out wher the hot spots are and a good program in getting these things out. If you don't, I would like to see them removed. They never had any business of being on the bank of the St. Lawrence River in

the first place. I couldn't believe it when I saw it in 1985 eroding directly into the river. So I want to see a permanent remediation, for whatever that means of cleaning it up. High temperature incineration, as bioremediation gets better, that may be used for part of it, but I would like to see it totally off of the border of the Mohawk Nation. And I want to move up-river and take care of Reynolds in a similar way, and Alcoa and it is my goal to leave the Mohawk Nation with a situation where they can once again utilize the fush and wildlife for human food and where the food chain will be protected within the 10 year period that Chief Harold Tarbell called for and which is now 9 years left to get to it. If we're going to reach that, we had best get moving.

Thank you.

GEORGE PAVLOU - The levels for the Tribal lands, both the GM and the EPA Proposals recommend that we cleanup down to the Tribal requirements. And so any contamination in the Akwesasne lands will be dealt with according to the Tribe's standards. You took issue with the 2 ppm proposal of EPA and called it hyprocrisy and I take strong exception to that and objection as well. We did recognize the standards of the Akwesasne as being standards, whereas the State of New York does not have such a standard, a promolgated standard. We defined this study as imcomplete and I agree to disagree with you on that one as well. We believe that we definitely defined the extent of the contamination downgrading

it from the site at this point in time.

Unless you have anymore questions or comments to make, the stenographer need another 5 minute break. Are there a few more questions that we can continue? Two more questions, alright.

JAMES HANNON - In regards to the EPA proposed PCB levels of 2 ppm in soil or in the river and 10 ppm in the soil, I strongly urge the EPA to reconsider and a opt the Akwesasne Environmental Council of Akwesasne of .1 ppm so as to avoid any problem with biocumulation in the future. It seems to me that by reducing the PCB levels to that particular level, we may delay the process of bioaccumulation, but you will no doubt not avoid it entirely.

Secondly, in regards to the request, from various individuals, to keep in mind the technologic feasibility in the cost of various remediation problems and suggestions. I would urge the EPA to keep in mind the technology forcing nature of its other various statutes and rules and regulations and to apply the various particular standards to this situation.

Third, in response to the man who suggested that we keep emotion out of politics and not consider the emotion in this particular situation, it seems to me that to promote that sort of a schism within people and to remove half of what makes us human from the political process is to ignore the business of politics which is a conflict resolution and if the conflict arises because of emotions or the conflict arises because of rationality, it doesn't matter. And to ignore that, would be to

ignore the problem.

I confer with everybody who suggested that permanence is proper alternative here and I further promote the idea of removing all possible PCBs from the land of the Mohawk Nation. Again as Mr. Stone said, it has no business being there in the first place.

Thank you.

GEORGE PAVLOU - Let me clarify that. Le me clarify how we arrived at the 2 ppm. We based our cleanup number for the sediment on the basis of a risk assessment that illustrated that 2 ppm would be an acceptable risk for the environment and the public health. If any new data comes forward to us to prove to EPA that our risk assessment was faulty in anyway, we're certainly glad to entertain it, and we would be accepting any problems that you have along those lines. Because it's getting late, I can stay as long as you want, but unless somebody has to offer any new data or new comments, I am going to have --- two more questions and that is it.

CRIS NEURATH - I have one question and a comment or two. I understand that tests were supposed to be made of dioxane and purine levels on the site, but that there was some mess up in the laboratory analysis and there are no real data on dioxane and purine levels. Is that correct or are their levels?

LISA CARSON - I believe there was on anyalysis that shows it.

CRIS NEURATH - Just one and is there more than one test made?

LISA CARSON - I am not sure. I'll have to check into that.

CRIS NEURATH - Ok. Well, my understanding is that if that test at the site has not been charactorized as to dioxane and purine and the point that I was going to make was that as Ward Stone mentioned some of the wildlife has had very high levels of dioxanes and purines found in them and as I am sure, you know, these substances are much more toxic than PCBs per weight and I have studied some of the literature on toxicity of PCBs and, for example, Japan you show poisoning where people ate oil, a food type oil, which has been contaminated with PCBs and dozens of them had severe illnesses as the result of that and from my readings, many scientists consider that health effects were not from PCBs but contaminants which are purines and perhaps dioxanes which tend to form in high temperatures of PCBs. I have see also where, a good example, was in Binghamton, New York, State Office Building where a PCB filled incinerator caught on fire and the entire building was contaminated with furanes and dioxanes and years later, it is still not useable because of those substances, extreme toxicity.

So I am concerned that no study has been done about dioxanes and furanes on the site. I realize that it's expensive to do these tests, but I believe there is a lot of evidence that the health risk from those could be much higher than the PCBs and there is definitly evidence that they exist on the sites. And that also relates to the remediation plans. I do fully agree

that a permanent solution is the only one which would make environmental sense as well as economic sense. The PCBs are very long-lived in the soil and I understand there is also heavy metals involved, and as I said, dioxanes and furanes, all of these substances last a long time , and a 30 year capping, just does not seem to be adequate for me. We're just putting it onto another generation.

As far as the remediation with incineration, I am concerned that you may destroy the PCBs 99.999, whatever the percent is. However, as I said dioxanes and furanes are created in some of this, in high temperatures and so you maybe creating small amounts of much more toxic materials.

And just one final comment on the aspect of jobs which I know people in Massena are very concerned about. I understand that. Perhaps in the Remediation Plan there could be a stipulation that some of the tens of millions of dollars, a certain fraction that will independently be spent on this cleanup, be spent locally hiring local people.

Thank you.

george pavlou - Thank you.

DOUB PREMO - My name is Doug Premo. I am an Engineer at the General Motors Plant in Massena. Today, I speak as a citizen of Massena. I have been a citizen here all my life. I would like to remain a good citizen of Massena.

In the past few years that I have been involved in our

Superfund Project. The EPA, the DEC, Department of Health, Ken Jock, Jim Ransom and the Tribe have been very professional with me and with General Motors and I want to thank them for that. We want to continue working with the EPA, with the Tribe and with the State Agencies and we are eager to get started and put a plan in place as soon as possible. We think that the GM Plan is the appropriate plan, but again we are willing to work with the State, the EPA and the Tribe to develop a resolution to the site that can be started as soon as possible. We hope that we do not get into any unnecessary delays or any hurdles that we cannot, working together, overcome.

I want to set the record straight on a couple of things that were brought up previously. GM is committed to cleanup the site, is not predicated on what the ranking on the NPL is. The ranking is over 400. However, regardless of whether it is 40 or 400, GM is committed to cleaning up the site because we want to do what is right.

Secondly a gentleman asked about spent carbon from our carbon filteration. It is disposed of in an EPA approved disposal facility.

Very briefly, I am just going to review the major items I see from the GM position. The site must be addressed. We all agree with that. The GM Plan meets all the EPA criteria that's stipulated in the National Contingency Plan. Specifically in this current March of '90 Guidance does say "taylor from

mediation of specific areas", that it's appropriate to use a mixture of treatment and containment and we agree with that. To use treatment where you can do it without providing risk. Where treatment has it risk, do not use treatment, but use a containment alternative and if there is a way in that containment to do a reduction of PCB contained material, and thus a reduction of toxicity, mobility and volume, use that type of treatment.

GM is committed to long-term maintenance of the site and again we want to work with the Agencies to develop that and we want to work through the EPA Regulations as they are set forth in the NCP.

Thank you.

GEORGE PAVLOU - One more question and that is it. I want to remind you that we will be here tomorrow from 10 to 2.

WALTER BASMAJIAN - My name is Walter Basmajian. I am a resident of Massena, a prior real estate broker. I used to be active in the political arena.

I am not too familiar with what you're talking about here today. I have been reading about it. I would just like to make a comment diverse from what the criticisms have been here about General Motors, about Reynolds and Alcoa. I do not blame the companies for what happened here in Massena or throughout this country. I blame our Government. I blame the people who sat in your seat years ago who issued the building permits for these companies to allow them and now they are bad corporate comapnies.

They are not bad corporate companies. Our Government was wrong in what it did.

I am an Arminian. Just 75 years ago yesterday, a million and a half Arminians were annihilated by the Government, the Turkish Government. Not the people, the Government. What has What has happened here in Massena and through all our country is not the fault of the corporation. It's the fault of you and I. The politicians. The people, who sat in your seat, who issued the building permits for these people to build in Massena and now we are saying they are bad corporate companies in our area. They are not. This should be corrected. It should be corrected by our Government. They allowed it. They should pay for it. They allowed General Motors to build in Massena. They allowed Reynolds to build in Massena. They allowed Alcoa to expand in Massena. They allowed them all over.

I am not critical of the companies that build in foreign countries. Let us be realistic and I am not talking pollution. I am talking facts. It's our Government who allowed these things to go on. It was our Government who allowed 300 Marines to be killed in Beirut, Lebanon. This has nothing to do with this. It's our Government.

Thank you very much.

GEORGE PAVLOU - Let me state, in no way in our presentation did we label GM a bad corporate citizens. As a matter of fact.

WALTER BASMAJIAN - I don't agree with you.

GEORGE PAVLOU - As a matter of fact, we applauded their cooperation and responsiveness. With respect to blaming the government, I guess, that's an opinion and I need your opinions. On the other hand, I disagree with it. Again, as I mentioned before, as we gain more understanding in terms of the risks, threats and toxic pollutants exposed to the environment, we have to act responsive and take care of it.

Sir, you are the last commentor.

RONDALD McDOUGALL - I am Ron McDougall. I am a Health and Safety Rep at General Motors and I am responsible for UAW people who work there.

I am a life-long resident of St. Lawrence County, in the general area, and I am also President of the Central Labor Council for Jefferson, Lewis and St. Lawrence County.

I would like to thank you for extending one more person to come up here and thank you for your tolerance in coming to the Town Hall tonight. You know, it has been a bad week for Massena and some may seem as being worse not only for Massena but our general area, but we will perceive.

You know organized labor which I am from and which I am the head of in this area has been responsible for carrying the sword for years and years when it comes to environmental issues and the general environmental concerns of this country. However, organized labor has always had the history of looking at all sides of all issues. We want to be fair. We want to be reasonable and

we want to negotiate.

You know, it's good to have all the news media here and some of them have left, whatever tonight, but there wasn't any news media at the UAW Hall this morning and we've got a good number of people here, but there were a lot more people over there, over here on the sidewalks, hundreds of them and I am sorry to say some of them are UAW laid off people. Some of them are Aluminum, Brick and Glass laid off people. Some of them are Native-Americans. Needy people and in need of Social Assistance and in need of food and we're glad to provide that service. A lot more people over there than over here, partly because of some of the industrial jobs that was lost in this Town.

With this in mind, we must strike a bargain. We must really do that. We must have a balance, a fair balance. I believe that the GM Feasibility Study does this.

Off-site - When I first became aware of this several years ago, Loran Thompson's land and some of the other Native American land was polluted. PCBs obviously from the studies. It was General Motors' problem. It was General Motors' responsibility. The Feasibility Study addresses that and we should have been over there a long time ago doing that. Unfortunately, with studies and being locked into one area, I realize that is impossible.

The river, there is nothing I would like better than to see that river dredged. However, the safety factor, the silt curtain and I've heard some different figures thrown around, but some of

the figures that I heard was only 80% first time capable so to speak. So we could lose 20% of those polluted sediments down to our good neighbors down in the Indian Reservationa and right next to their watering thing. Now, I really fear for the safety of that. The feasibility study contains and its provisions, of course, in the law that allow the GM plants to monitor the situation continually. GM is committed to do its environmental share.

When they speak, someone earlier spoke of thirty million dollars, that's correct. GM has spent over thirty million dollars already. Another 40 or whatever the figure happens to be, that's 70 million dollars. Now, people say, you don't look at cost, don't look at this, well unfortunately, corporations have to. They have to to survive. Maybe the Federal Governmental doesn't have to and I realize 70 million dollars isn't much money, maybe it's money to you, but Federal Government and State Government, 70 Million dollars isn't much money anymore and it seems, you know, when you're dealing with a trillion dollar budget deficit, I can understand some people's thinking.

You know, I have heard some other things about GM did this, UAW people did this and they didn't do that, their not midnight helpers. We don't have midnight helpers down there and we never did. You know, GM has been fair. They have been open and, you know, I have enjoyed good working relationship, I have seen it foster with Jim Ransom and he's right here. I don't see Kenny

Jock, but I can assure you that what Doug Premo says, even they can assure you that it's been a good working relationship. I hope it continues. You know, an example of this, is the drinking water that was provided to the Racquette Point and some residents over there and I am not sure how many, but there is one thing that I am sure of is the bill. You know, there was only a suspect case. There was nothing justified. Those wells were tested and retested and I have had people from EPA tell me, not you Sir, tell me that's the most, those set of wells are the most tested wells in this United States of America. I have no way of knowing if that is true or not, but it was retested and retested and therefore, drinking water was stopped. But I don't know if I am free to say that the dollar figure or not, but well, it doesn't matter, I am going to say it anyway, $200,000 to provide drinking water. A little over $200,000 just because of a possibility that the wells were defective.

You know, the Native Americans have been our neighbors and I have fully represented hundreds of them in all three plants because as head of the Labor Council, I represent people in all three plants. The Native Americans on this Reservation are good neighbors. They need help. They need prayers. They have got the situation and I don't even pretend to understand or know about. But one thing that we can reward them with is the fact that, you know, we're going to dig up this dump. You know, a lot of you think dig it up, dig it up. Are we digging up dumps all

over the country? Are we digging up the dump at Louisville and Waddington and in Fort Covington? For all we know, the only reason it's even being considered was some EPA insiders, because it happens to be next to an Indian Native-American Reservation.

You know, I feel very badly about that. What they really need is Government help. Federal Government help and I am not talking about just the environment. I am talking about Federal and State Government helping the situation we have with our neighbors and they also need our prayers.

You know, a few weeks ago, there was another environmental problem. The union officials here, locally, talk about a possibility of meeting some other regulations, not EPA regulations, State regulations and these are probably put in the newspaper and passed around Albany and wherever, you know. When they talk about Reynolds specifically, the plant is going to have to shut down and the answer from an outside source, probably somebody that doesn't care about Massena or anybody in Massena or the Reservation was they always say that. Oh, I'm not sure how often plant managers or unions or other people threaten to shut plants down, but I do know one thing, they do shut them down. That's for sure. You know, there's been some people leave. It's unfortunate, but we ought to take the time to look at our economic stability. There's pictures right back on the wall. Those 3 plants back there are the economic stability of our area. So I ask for a fair assessment. I ask for a negotiated settlement

and I ask for you to consider approving the GM Feasibility Study.

Thank you your kindness in letting me come up here last. I appreciate it.

GEORGE PAVLOU - Thank you Mr. McDougal. You made some statements which, you know, require a response from me at this point in time.

Let me state that the cost of EPA needing protectiveness. The protectiveness criteria of protecting human health in the environment. We do not assign costs, you know, to those remedies. We must achieve the protectiveness levels to the point where we achieve acceptable risks. Those cases where we cannot achieve that level then we label our remedies interm remedies. The other point that I wanted to make is that EPA does not negotiate remedies. We may allow for a few resolutions of certain issues, but we do not deviate from meeting, again, the protectiveness criteria.

With this, I would like to end the meeting and reiterate that we are going to be here at 10:00 tomorrow morning and we are going to be here to 2:00 and it's going to be a less formal setting where we can answer questions on the one to one basis and getting into more detail if you would like to. I would like to thank all of you, you know, for acting in a civilized manner and not letting this meeting get out of control and again, I appreciate all of your comments.

Thank you very much.

C E R T I F I C A T I O N

I, Rita L. Richer, St. Lawrence County Justice Court Reporter, do hereby certify that the foregoing is a true and correct transcript of the public meeting in the above-entitled matter as taken by me stenographically at the time and place noted in the heading hereof, to the best of my knowledge and ability of the said notes.

Rita L. Richer

Rita L. Richer

Dated: May 11, 1990
Massena, New York

GMM 007 1989