

March 14, 2006

Mayor James Ruberto
City Hall
70 Allen Street
Pittsfield, MA 01201

Dear Mayor Ruberto,

This is a follow up to our letter to you from March 7, 2006, supporting the Allendale School Task Force in requesting the halting of hazardous waste dumping at Hill 78, Building 71, and other adjacent areas. Thank you for taking the time to read this information. We wanted to expand on that letter and state why we feel we are putting our children at risk. Our concerns center on the following:

- The information regarding cancer risks, endocrine disruption, neurodevelopmental problems, to site just a few effects, continue to mount, and we believe air exposure to PCBs poses a real threat to the children and staff at Allendale School. We need to act in a preventative and precautionous manner when dealing with our children's health. Several studies have reported health effects of living near hazardous waste sites (review by Vrijheid, 2000). Evidence that humans are exposed to PCBs by air contamination continues to grow (Sergeev and Carpenter, 2005; Baibergenova et al 2003; Carpenter et al 2001,2003; Kudyakov et al 2004).
- Other PCB hazardous waste sites (Hermanson et al, 2003) have been shown to have elevated volatile PCBs, and there is no reason to expect things are different here.
- The number of air tests per year around the school has been inadequate – about 6-10 per year since 1999 North of the On Plant Consolidation Area (OCPA). Since November of 2005¹, testing has been more frequent, prompted primarily by citizens' concerns about inadequate monitoring.

¹ It is also important to note that since November, 2005 trucks were not moving, and that winter is typically a season in which PCB volatilization is relatively low compared to the warmer months. Elevated PCB ambient air levels during wintertime would be particularly worrisome as levels are typically higher during the warmer months.

- Based on performance standards used by EPA's Human Risk Assessment for the Rest of the River which used 3.4 nanograms/m³ as their threshold for excessive risk, PCB ambient air levels at the consolidation sites have indeed been elevated. On November 1-2, 2005, PCB ambient air levels North of the On Plant Consolidation Area (OPCA) were 11 and 23 nanograms/m³, and on October 6-7, 2005 the level was 18 nanograms/m³. According to Dr. Carpenter (personal communication), there is strong evidence that normal 'background' air concentrations of PCBs are about 1 to 1.5 nanogram/m³.
- The air (different than the filters meant to catch particulate matter) inside the school has only been monitored twice as best as we can tell by the DPH (November 22, 2005, and Dec 1, 2005).
- To date, there has not been any analysis of school air filters using the most up to date, congener specific methods, except by Dr. David Carpenter's Lab at the University of Albany, and his report detected PCBs in filter's from the fall of 2005).
- The methods the EPA/DPH have used to detect PCBs have not been congener specific. Congener specific testing is felt to be a more accurate way to measure PCBs, especially as PCB mixtures change over time, and is considered the current standard of measurement.
- There is a growing concern among scientists that the EPA's "alert level" of 50 nanograms/m³, and their alarm level of 100 nanograms/m³ are too high.
- The physical proximity of the waste site to the school and schoolyard is (and has been) dangerously close. This is an observation we feel does not need excessive scientific backing.

We hope this information is helpful, and also hope you can become an advocate in this movement to stop the hazardous waste dumping at the GE site.

Sincerely,

Richard Rosenfeld, M.D.

Siobhan McNally, M.D.

References

Vrijheid M 2000. Health effects of residence near hazardous waste landfill sites: a review of epidemiologic literature.

Environ Health Perspect 108 (suppl 1): 101-112.

Sergeev A V, Carpenter DO. 2005. Hospitalization rates for coronary heart disease in relation to residence near areas contaminated with persistent organic pollutants and other pollutants. Environ Health Perspect 113: 756-761.

Baibergenova A, Kudyakov R, Zdeb M, Carpenter, DO. 2003. Low birth weight and residential proximity to PCB-contaminated waste sites. Environ Health Perspect 111: 1352-1357.

Carpenter DO, Shen Y, Nguyen T, Le L, Lininger LL. 2001. Incidence of endocrine disease among residents of New York areas of concern. Environ Health Perspect 109: 845-851.

Carpenter DO, Nguyen T, Le L, Baibergenova A, Kudyakov R. 2003 Profile of health effects related to proximity to PCB –contaminated hazardous waste sites in New York. Fresenius Environ Bull 12: 173-180.

Kudyakov R Baibergenova A Zdeb M Carpenter DO. 2004. Respiratory disease in relation to patient residence near to hazardous waste sites. Environ Toxicol Pharmacol: 18:249-257.

Hermanson MH, Scholtan DA, Compher K. 2004 Variable air temperature response of gas-phase atmospheric polychlorinated biphenyls near a former manufacturing facility. Environ Sci Technol 37:4038-4042.

www.epa.gov/ne/ge/thesite/opca-reports.html

www.epa.gov/ne/ge/thesite/allendale-reports.html