



***Working to protect the environment of Berkshire County, MA***

October 19, 2006

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Massachusetts Department of Environmental Protection, WERO  
436 Dwight Street  
Springfield, MA 01103

Please accept these comments from the Berkshire Environmental Action Team (BEAT) on the Provisional Comprehensive Site Assessment Review 06-236-003.

Departmental Determinations

#1 BEAT strongly agrees with DEP's request for more sampling and we urge DEP to set strong guidelines for the sampling to ensure that the samples are taken to sufficient depth that the consultants do not have to keep going back after each round is analyzed to do more sampling. In other areas this has lead to years of delay.

Additional sampling for PCBs should be required. BEAT believes there are two locations where PCB sampling should be conducted. These two locations may be one in the same location.

1. Samples should be taken to determine the vertical and horizontal extent of PCB contamination found in the GE sampling. These samples should be taken to a depth of at least 12 feet, although the deeper samples can be held pending results of the 4-6, and 6-8 foot levels. Much of this sampling will be below the water table. If the results show PCBs in the water table, BEAT feels it is especially important to remove this contamination so it will not eventually make its way to the river.
2. The second area where BEAT believes must be tested is around the end of the paper road leading into the dump as shown on the City of Pittsfield Topographic map G11. BEAT believes that this is the road that GE workers have reported to the Housatonic River Initiative, that they drove tanker trucks full of PCB laden oil down, and emptied the tank at the end of the road.

#4 BEAT would ask that the CAAA report should evaluate additional remedial alternatives:

1. Full removal of all fill and restoring the entire wetland at an elevation more consistent with the probable elevations before the area was filled. This would likely eliminate flooding at the Wahconah Park parking lot and ballfield. Both the likely effects of this action as well as a ballpark cost estimate should be included.
2. Partial removal of fill along the river to create a remediated wetland buffer between the river and the landfill. Riprap or sheet piling might then be used to separate the contaminated landfill from the restored wetland. Again, this wetland would be at an elevation consistent with pre-fill conditions.

3. Other partial removal of fill and wetland restoration to relieve flooding at Wahconah Park and create a functional wetland with associated wildlife habitat.
4. Consideration of creating, possibly in partnership with one of the local environmental organizations, a raised boardwalk above the restored wetland with associated educational material about the values of wetlands and the hazards of dumping.
5. Treatment of the contamination.

Other comments on alternatives – BEAT would not want to see this area leveled as part of any remediation. Why not remove selected contaminated areas, or remove the top foot of soil over the entire site, but retain mature trees – or stands of mature trees – depending on the level of contamination at the surface?

The impact to neighboring property values should be taken into account. If this area can be restored to create a recreation or wildlife viewing area, it might add substantial value to the property values. It is a lovely area to look across right now – if you ignore the chain link fence – and watch great blue heron fishing in the distance.

#6. Groundwater samples why not PCBs? Just because they are ND now doesn't mean they won't migrate! Repeatedly it has been shown that PCBs do migrate with groundwater and they do volatilize.

Thank you for considering our comments.

Sincerely,

Jane Winn