

MASSACHUSETTS DEP

COMMENTS ON THE  
HOUSATONIC RIVER  
ECOLOGICAL RISK  
ASSESSMENT

# Focus of Comments

- Detailed DEP comments on the ERA were submitted to the panel
- Today's oral comments will focus on the risk summary and weight of evidence

# GENERAL ELECTRIC STUDIES

- Not part of the ERA work plan
- Not part of the established assessment and measurement endpoints
- Agencies were not given an opportunity to comment on study protocols before studies were begun

# GENERAL ELECTRIC STUDIES CONTINUED

- DEP does not consider GE studies valid independent lines of evidence
- Should only be included as supportive or contradictory information in the risk characterization and/or uncertainty analysis

# BENTHIC INVERTEBRATES

- Laboratory toxicity tests and sediment benchmarks provide strong evidence that concentrations of PCBs and TEQ present a high risk to benthic invertebrates

# Amphibians

- Sediment toxicity studies in late larval/metamorph life stage wood frogs provide strong evidence of high risk
- Sediment toxicity studies in leopard frog larval, late larval/metamorph, and adult life stages present strong evidence of high risk

# Fish Community

- DEP agrees with conclusion that risks are low to moderate for mortality of adult fish
- Conclusions on risk to fish community should be based on more sensitive effects to reproduction and development

# Insectivorous Birds

- Tree swallows and robins use different habitats and occupy different niches
- Should have separate assessment endpoints for terrestrial and semi-aquatic birds
- Due to tree swallow insensitivity, study should be reduced from high to medium
- Medium weight, low risk tree swallow study combined with medium weight, high risk exposure modeling results in medium risk for insectivorous birds



# Piscivorous Birds

- DEP recommends excluding GE kingfisher study from WOE due to lack of dose response, improper prey proportions, small number of burrows, and narrow range of total estimated daily intake
- Dietary modeling indicates a high magnitude of risk to both the kingfisher and osprey from PCB exposure

# Piscivorous Mammals

- DEP agrees with EPA's conclusion that risk of harm to piscivorous mammals is high
- Conclusion is well-supported by measurement endpoints

# Omnivorous and Carnivorous Mammals

- DEP agrees that the risk of harm to omnivorous and carnivorous mammals is moderate to high
- DEP believes the GE sponsored Boonstra (2002) study should not be used in the WOE due to problems listed by EPA