



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



June 18, 2008

Kevin G. Mooney  
Project Manager  
General Electric Company  
159 Plastics Avenue  
Pittsfield, MA 01201

RE: Housatonic River—Connecticut  
Proposed Biological Monitoring for 2008

Dear Mr. Mooney,

Thank you for your letter of May 22, 2008 and accompanying proposal entitled, *Proposed 2008 Biological Monitoring Studies on the Connecticut Portion of the Housatonic River*, prepared for the General Electric Company (GE) by the Academy of Natural Sciences of Philadelphia (ANSP) and dated May 14, 2008. The Connecticut Department of Environmental Protection (DEP) appreciates GE's willingness to voluntarily continue with the biennial monitoring of fish and benthic insects for the 2008 season although there is no longer a Cooperative Agreement in place between GE and DEP. DEP and Connecticut Department of Public Health (DPH) staff have reviewed the proposal and our comments are provided below.

DEP and DPH have no specific comments on the benthic insect portion of the monitoring proposal. We understand that ANSP is proceeding with the sampling since this normally occurs in May/June and we are comfortable with that scenario. With regard to the fish sampling which is generally conducted in late summer, we would be interested in including some supplemental species, as appropriate, at the four standard monitoring stations as well as Falls Village. Since panfish (ie. - yellow perch, white perch and sunfish) have not been sampled extensively for several years, DEP and DPH would appreciate it if these fish species could be added to the monitoring study for 2008. In addition, DEP and DPH would welcome additional data on northern pike. Data on these species is important to DPH in establishing and reassessing fish consumption advisories.

As you may know, DEP submitted comments on May 20, 2008 to the United States Environmental Protection Agency (EPA) on GE's *Corrective Measures Study Report (CMS)* for the GE-Pittsfield/Housatonic River Site – Rest of River, dated March 2008. In those comments, DEP, with the concurrence of DPH, has requested that a number of other fish species in addition to brown trout and small mouth bass, as well as benthic insects be monitored in order to

maintain a more complete, accurate and consistent record of PCB levels in fish and benthic insect groups in the Connecticut section of the Housatonic River. Our comments on the CMS also included a number of other requests. While we await responses to our comments from EPA and GE, we want to be clear that the final scope of the continued voluntary monitoring studies should in no way be construed as acceptance by DEP of a study which is not as robust as the one suggested by DEP in its comments to EPA on the CMS.

Thank you again for contacting us regarding the voluntary monitoring proposal. We look forward to discussing the fish species portion of it further with you.

Sincerely yours,



Susan C. Peterson  
Housatonic Watershed Coordinator  
Bureau of Water Protection and Land Reuse

cc: Timothy Barry (CT DEP)  
Patrick Bowe (CT DEP)  
Michael Carroll (GE)  
Gregory Chasko (CT DEP)  
Jan Czczotka (CT DEP)  
Timothy Conway (EPA)  
Lee Dunbar (CT DEP)  
Gary Ginsberg (CT DPH)  
William Hyatt (CT DEP)  
Robert Hust (CT DEP)  
Traci Iott (CT DEP)  
John Looney (CT AG)  
Edward Machowski (CT DEP)  
MaryAnn Nusom Haverstock (CT DEP)  
Robert Orciari (CT DEP)  
Edward Parker (CT DEP)  
Ernest Pizzuto (CT DEP)  
Sharee Rusnak (CT DPH)  
Andrew Silber (GE)  
Paul Stacey (CT DEP)  
Susan Steenstrup (MA DEP)  
Susan Svirsky (EPA)  
Dean Tagliaferrro (EPA)  
Brian Toal (CT DPH)  
Betsey Wingfield (CT DEP)