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#### Modeling Study Calibration Phase

These comments are general and for the record. HRI's technical advisor has submitted detailed modeling comments for the Housatonic River Initiative.

In leaving out the the approximately 100 mile portion of the river from Woods Pond in Lenox to the Derby dam in Connecticut the EPA is ignoring the entire picture of " Fate and Transport of PCBs in the Housatonic River."

Below Woods Pond the river is posted from eating fish and frogs all the way to the Derby Dam. It is also well known that deposits of PCBs exist at dam sites throughout this portion of the river. Certainly these PCBs were deposited by transport through the river system and are posing enough of a threat to keep these advisories in effect. EPA has arbitrarily decided that they will not address this section of the river even though risks are associated with the PCB levels.

It is well documented that PCBs are being detected at increasing levels in the arctic and that Housatonic PCBs as well as PCBs from other sources are contributing to the worldwide fate and transport of PCBs within the global food chain, air, and water.

EPA's consideration of Fate and Transport in a River System should include all locations that are contaminated and also consider the Transport of PCBs into the oceans.

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