

Housatonic Environmental Action League, Inc.

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860-672-6867

February 7, 2005

Alison Wolfe
Marasco Newton Group
2801 Clarendon Blvd., Suite 100
Arlington, VA 22201

Sent via email to: GEPittsfield@sra.com

RE: MODEL CALIBRATION: MODELING STUDY OF PCB CONTAMINATION
IN THE HOUSATONIC RIVER, DCN: GE-122304-ACMG, Environmental Remediation Contract
GE/Housatonic River Project, Pittsfield, Massachusetts

Dear Ms. Wolfe,

The Housatonic Environmental Action League, Inc. (HEAL) is a non-profit 501(c)(3) coalition of citizens and organizations dedicated to the protection of the Housatonic River watershed and corridor. HEAL acts as a government and corporate watchdog on river protection issues and is involved with the ongoing issue of longstanding polychlorinated biphenyl (PCB) pollution and other toxins that contaminate the river system. As an advocate for the natural environment, HEAL identifies and responds to potential environmental crises, educates the community for greater awareness of relationships with the environment, and participates in shaping the decisions that affect the environment.

Please enter HEAL's comments into consideration for the Modeling Study:

- HEAL fully supports and endorses the comments submitted by Steven W. Effler, Ph.D., Director of Research at the Upstate Freshwater Institute, Syracuse, NY. Dr. Effler was contracted by the Housatonic River Initiative (HRI) who is the single recipient of the EPA's Technical Assistance Grant (TAG). HEAL appreciates the opportunity afforded our organization to provide input to Dr. Effler during his expert review of the Modeling Study.
- The Connecticut section of the Housatonic River has been essentially ignored during this process. There has been woefully inadequate sampling and testing completed in CT.
- The study is saying that the transport of toxins exclusively travels in a linear, horizontal direction. The transport of toxins in a vertical direction (up and down) has barely been touched upon.
- Stocked trout in the CT section of Rest of River have measurable levels of PCBs within two weeks of entering the system. Obviously, PCBs are being transported from Massachusetts to Connecticut.
- The CT Department of Public Health has issued fish consumption advisories for all species in the Housatonic River. All fish species are contaminated from PCBs that originate and continue to enter CT from upriver. The fate and transport of PCBs in the CT section of the river has been poorly studied.

- Volatilization of PCBs is a known and important pathway of transport throughout the globe. There is inadequate study to this form of transport.

Thank you for the opportunity to comment on this document.

Sincerely,

Judith A. Herkimer, Director