



**STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION**



November 17, 2005

Ms. Susan Svirsky
Rest of River Project Manager
c/o Weston Solutions
10 Lyman Street
Pittsfield, MA 01201

Dear Ms. Svirsky:

The Connecticut Department of Environmental Protection (CTDEP) appreciates the opportunity to provide comments on the revised Interim Media Protection Goals Proposal for the Housatonic River submitted by the General Electric Company on September 6, 2005. This report identifies preliminary goals to be used in the evaluation and design of remedial alternatives for the Housatonic River. The Consent Decree places several requirements on the development of IMPGs, including:

1. The IMPGs must be protective of human health and the environment, taking applicable or relevant and appropriate federal and state requirements and the risk assessments into consideration.
2. IMPGs are not cleanup standards and may be modified during the Corrective Measures process.
3. IMPGs must be developed for sediments, surface water, floodplain soils, biota and air.
4. The IMPGs must include numerical concentration-based goals for the various media and may also include narrative descriptive goals.

The IMPGs presented in the report are not adequate to protect human health and the environment. Additionally, the presentation of Applicable or Relevant and Appropriate Requirements need modification. In order to address these issues, CTDEP offers the following comments:

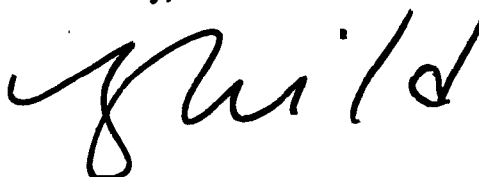
1. The IMPG ranges presented in the document do not adequately characterize environmental conditions protective of human health and the environment. Knowing that the Consent Decree acknowledges that IMPGs may be modified during the Corrective Measures process when demonstrated as necessary, it is important to begin the evaluation of remedial alternatives based on proposed environmental levels that will be protective of all sensitive receptors. The broad ranges proposed within the current document will not adequately protect the more sensitive receptors. As such, the IMPGs must be revised to reflect point estimates for PCB

concentrations in the various media that will be protective of the most sensitive receptors.

2. The IMPG document presents two complete sets of IMPG values, one set based on the peer reviewed risk assessments and the other on alternative proposals from General Electric. The peer reviewed risk assessments must be used as the basis for the IMPGs unless the need for a more conservative value is supported.
3. The CTDEP requests that the Connecticut Water Quality Standards be included in total within the narrative forms of the IMPGs. Currently, the narrative forms of the IMPGs contained within the document are too general. Specificity must be added to the narratives in order to better clarify the potential remedial goals and establish consistency with both the numeric and narrative portions of the Connecticut Water Quality Standards. As the process outlined in the Consent Decree proceeds, both CTDEP and the Connecticut Department of Public Health (CTDPH) will continue to advocate for consistency between remedial goals for the river and implementation of Connecticut's numeric criteria and narrative goals, including the restoration of the chemical and biological integrity of the Housatonic River allowing for the attainment of designated uses such as the protection and propagation of fish and wildlife as well as recreational uses of the river. Both CTDEP and CTDPH place great emphasis on the reduction of PCB concentrations in fish tissue sufficient to allow the current fish consumption advisories to be ended.

Thank you for the opportunity to provide comment on the proposed IMPGs. We look forward to working with EPA and General Electric to resolve the issues outlined above and ultimately to the restoration of environmental quality within the Housatonic River. Please contact Ms. Traci Iott at (860) 424-3082 or Ms. Susan Peterson at (860) 424-3854 with any questions you may have.

Sincerely,



Betsey Wingfield
Director
Bureau of Water Management
Planning and Standards Division

Comments have additionally been transmitted via FAX and EMAIL