

Susan Svirsky
10 Lyman St., Suite #2,
Pittsfield, Ma.

RE: Housatonic River - Rest of River Interim Media Protection Goals (IMPGs)

Dear Ms. Svirsky

We would like to thank you for the opportunity to comment on this extremely important document that will determine the range for ecological and health risk standards in the Housatonic river floodplain and riverbanks.

The Environmental Protection Agency (EPA) has done an outstanding job of overseeing implementation of the Consent Decree and remediation/cleanup in the first two miles of Housatonic River. There are remaining issues, however, including the Newell Street Area II drum and soil contamination and the timing of the Silver Lake capping proposal, and the concern about potential re-contamination of already cleaned river segments. Given this, HVA urges EPA to be as logical and efficient in the remaining remediation effort as possible.

HVA recognizes that the Housatonic River cleanup involves a complex environmental system, and that separate modeling efforts can yield different results, as is the case here. However, since the objective of the IMPGs is to protect human health and the environment, we urge EPA to be conservative. If there is any error to be made in selecting the floodplain and riverbank cleanup goals, that error should favor the protection of human health and the environment.

We therefore urge you to select the lower numbers identified via the EPA peer-reviewed Ecological and Human Health Risk Assessments. The intent of these assessments was to develop up-to-date and state-of-the-art research on human health and ecological impacts of PCB contamination. These documents are particularly relevant because they were researched and developed specifically for the Housatonic Watershed, and because they have been reviewed, critiqued and accepted by a national peer review panel as appropriate for determining acceptable remediation range limits.

Again, we appreciate this opportunity to comment and look forward to working with you as this important cleanup continues.

Sincerely,

Dennis C. Regan
Berkshire Director