

IMPG comments - Jane Winn_BEAT.txt

From: Svirsky.Susan@epamail.epa.gov
Sent: Tuesday, November 15, 2005 4:25 PM
To: Tagliaferro.Dean@epamail.epa.gov; Conway.Tim@epamail.epa.gov
Cc: Campbell, Scott (MNH)
Subject: Fw: comments on IMPGs

Susan Svirsky
617.918.1434

----- Forwarded by Susan Svirsky/R1/USEPA/US on 11/15/2005 04:24 PM

Jane & Bruce
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Susan Svirsky/R1/USEPA/US@EPA
To
cc
Subject
comments on IMPGs

11/15/2005 03:43
PM

Please respond
to
jwinn2@berkshire
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November 15, 2005

Susan Svirsky, EPA
10 Lyman St., Suite 2,
Pittsfield, MA 01201

Dear Susan Svirsky,

Please, accept the following comments from the Berkshire Environmental Action Team (BEAT). We are asking that you make the final Interim Media Protection Goals (goals) as stringent as possible and do not accept any of General Electric's (GE) "alternative" figures. The citizens of the Housatonic River Watershed deserve a fishable, swimmable river.

The permit for setting these goals states that the goals must take into account the results of the Human Health and Ecological Risk Assessments. GE did take these results into account, but then presented an "alternative" approach that does not take these assessment results into account. They did this, they say, because they disagree with the Risk Assessments. They think the peer reviewed Risk Assessments are too conservative. All GE's "alternative" goals leave more PCBs in the soil, food, and wildlife. One shocking example of GE's goals - it would be permissible to leave fish for human consumption with 55 parts per million (ppm) PCBs. US Food & Drug Administration sets a PCB limit of 2ppm in fish (see Federal Register May 22, 1984 - 49FR21514). GE has to remediate the soil on residential properties to 2ppm average. Why would they be allowed to leave enough PCBs in the river to have fish with 55 ppm in their muscle?

BEAT disagrees with the Risk Assessments, too - but in the other direction. The Risk Assessments did not take into account synergistic effects of PCBs and other chemicals - such as pesticides - even though it looked at exposure of grounds keepers and farmers, who are often exposed to pesticides, herbicides, and fungicides, to PCBs.

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BEAT strongly urges EPA to be very conservative in setting these IMPG goals. Here are some of our thoughts:

The citizens deserve a river that provides fish that are safe to eat and water that is safe to swim in.

Remediation goals should be based on the very lowest numbers from the results of the Risk Assessments, should assume the highest exposure level that could be taking place, and should assume the most sensitive receptors. (Fetal exposure, nursing infants, people with compromised immune systems)

Remember that the Risk Assessments did not take into consideration the synergistic effects of PCBs with other chemicals. There are many other chemicals in our watershed - from pesticides, to pharmaceutical that get flushed down the toilet and are not broken down by sewage treatment plants.

People really do eat the fish they catch from this river - signs or no signs. Some of these people are "sensitive receptors", living with mental health problems or possibly compromised immune systems.

Mink eat fish and other animals in and around the river. To have our mink population recover we need a thorough "clean up". Please, use the 0.98 ppm figure or less to safeguard our mink.

Thank you for taking our comments into consideration.

Sincerely,
Jane Winn for the Berkshire Environmental Action Team

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Jane Winn

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BERKSHIRE ENVIRONMENTAL ACTION TEAM

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