

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**New England Office – Region I**  
**One Congress Street, Suite 1100**  
**Boston, Massachusetts 02114-2023**

April 3, 2006

Mr. Andrew T. Silfer, P.E.  
General Electric Company  
159 Plastics Avenue  
Pittsfield, Massachusetts 01201

**RE: Revised Interim Media Protection Goals Proposal**

Dear Mr. Silfer:

EPA has completed its review of GE's report entitled "Interim Media Protection Goals Proposal for Housatonic River, Rest of River" (hereinafter IMPGs or IMPG Proposal) revised March 9, 2006. GE submitted the revised IMPG Proposal to address the deficiencies and comments outlined in EPA's letter dated December 9, 2005 and to fulfill the requirement outlined in Appendix G to the Consent Decree (the Reissued RCRA permit). EPA, after review and comment by MADEP and CT DEP, approves the revised IMPG Proposal, while making the observations noted below.

As described in Special Condition II.C. of the Reissued RCRA Permit, "[the] proposed IMPGs shall consist of preliminary goals that are shown to be protective of human health and the environment. Such IMPGs are not necessarily equivalent to cleanup standards or Performance Standards, and may be modified or revised in the selection of Performance Standards and associated corrective measures." GE has paraphrased this description of the IMPGs in the Revised IMPG Proposal.

GE has adequately addressed the deficiencies and comments regarding the numerical IMPGs outlined in EPA's letter dated December 9<sup>th</sup>. However, some of the text describing the numerical risk-based media concentrations (RMCs) represents a characterization of the RMCs that is not shared by EPA, including statements regarding the conservatism or uncertainty of the values. EPA has expressed its views regarding the appropriateness of assumptions, calculations, degree of conservatism, and/or uncertainties in the Human Health and Ecological Risk Assessments, Responsiveness Summaries and

other documents; EPA's approval of the revised IMPG Proposal should not be interpreted as an endorsement of GE's characterizations of either the RMCs or these documents.

EPA notes the following points regarding the discussion and rationale provided by GE in Section 4 (Chemical-Specific ARARs) (page 74) regarding the Connecticut Remediation Standard Regulations (RSRs). First, EPA typically considers the numeric criteria established in the RSRs to be ARARs; however, a numerical Performance Standard for PCBs of 2 mg/kg for residential properties was established in the Consent Decree (to which CTDEP is a party) which constitutes the Performance Standard for residential properties in the Rest of River, including Connecticut. In addition, under the definitions in the CT RSRs, residential activity includes outdoor recreational areas; thus GE's statement regarding applicability or relevance of residential standards to recreational exposures in Connecticut is an incorrect characterization of the RSRs.

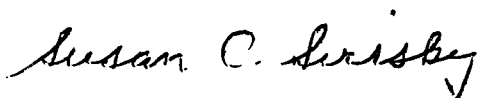
The conclusions regarding the comparison of EPCs associated with background levels in breast milk to the RMCs calculated for consumption of bass, duck breast and cow milk from backyard farms are largely correct. However, the EPCs associated with background concentrations in breast milk are lower than some of the probabilistic RMCs for bass and duck breast at a non-cancer hazard of 1. The paragraph on page 44 is correct with the addition of the phrases highlighted in bold italics:

These estimated EPCs associated with background levels in breast milk can be compared with the RMCs for total PCBs that have been calculated for the original consumption scenarios (consumption of bass, duck breast, and cow milk from backyard farms), as set forth in Tables 2-2 and 2-3 above. This comparison shows that, for both RME and CTE values, the EPCs associated with background levels in breast milk (based on EPA's own calculations) are higher than the cancer-based RMCs at the  $10^{-6}$  and  $10^{-5}$  risk levels, as well as the non-cancer-based *deterministic* RMCs, and are somewhat lower than the RMCs calculated at a cancer risk level of  $10^{-4}$  ***and some of the probabilistic bass and duck breast RMCs calculated at a non-cancer hazard of 1***. In other words, the PCB RMCs that have been calculated for the consumption scenarios (except for those based on a  $10^{-4}$  cancer risk ***and some of the probabilistic RMCs based on non-cancer hazard***) are more stringent than the back-calculated EPCs associated with background concentrations in breast milk. ***For the RMCs that are more stringent than the back-calculated EPCs***, maternal exposures to PCBs in fish, duck, or cow milk at the levels of those RMCs would not result in breast milk exposures exceeding background levels.

There is a typographical error on page 17, referring to the three target cancer risk levels used for derivation of the RMCs: "10<sup>-6</sup>, 10<sup>-5</sup>, and 10<sup>-6</sup>"; the last should read 10<sup>-4</sup>. The analysis conducted in the revised proposal reflects the correct risk level.

This approval letter for the revised IMPG Proposal constitutes EPA's establishment of the numerical IMPGs, so that GE can develop corrective measures as required under Special Condition II.E. of the Reissued RCRA Permit.

Please contact me if you have any questions.



Susan C. Svirsky, Project Manager

Rest of River

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