



B.E.A.T. Working to protect the environment of Berkshire County

April 6, 2006

Beth Nerrie
SRA International
2801 Clarendon Blvd., Suite 100
Arlington, VA 22201

Dear Beth Nerrie,

Please accept the following comments on the Model Validation Report for the General Electric Co. (GE), Pittsfield / Housatonic River Site, Rest of River, from the Berkshire Environmental Action Team, Inc. (BEAT).

BEAT does not believe that the Model Validation Report reasonably accounts for the relevant processes affecting PCB fate, transport, and bioaccumulation in the Housatonic River to a degree consistent with achieving the goals of the modeling study.

The Model Validation Report appears to accurately reflect the watershed model, with reasonably accurate predictions of flow and depth. However, the fate and transport of PCBs does not appear to us to be accurate, especially in the Woods Pond area. The model does not appear to account for the degree of sediment mixing that occurs at Woods Pond, thus we believe, under estimates the amount of PCBs that will be present in the top six inches of the sediment. This degree of mixing also points to the folly of assuming the top foot of sediment is all that matters.

There is evidence of bias in the models for bioaccumulation of PCBs in fish. In most every graph there are more data points on the under reporting half of each graph. For example - the "by species" graph. Sunfish have many more on the under reporting side including some in the under reporting by 2.5-5 fold, but none in the over reporting by the same amount. Bullhead has one in 2.5-5 under but none in same range over. Bass

has 3 in 2.5 to 5 under and one in same range over. We believe the Model is consistently under reporting. Either this should be corrected or at least stated and accounted for during any decision making process.

BEAT believes that the zero PCB concentration from the East Branch test run is not realistic at Woods Pond. There is enough turnover in the ponded area before the dam that even the top 6 inches will not become that clean.

Thank you for considering our comments.

Sincerely,

Jane Winn, Executive Director