

Subject: FW: CMS Proposal comments

Attachments: Comments on CMS for Housatonic River in Connecticut.doc

-----Forwarded by Susan Svirsky/R1/USEPA/US on 03/08/2007 08:57PM -----

To: Susan Svirsky/R1/USEPA/US@EPA
From: Curtis Read <cread@lablite.com>
Date: 03/08/2007 04:12PM
cc: 'Jean Cronauer' <jeancronauer@conservect.org>, Caprice Shaw <cshaw@hvatoday.org>, Dan McGuinness <nwccog1@snet.net>, Tim Gray <timgray@berkshire.net>
Subject: CMS Proposal comments

See attached

Curtis S. Read

Chairman, Northwest Conservation District

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Comments on CMS for Housatonic River in Connecticut

By: Curtis Read, Chairman, Northwest Conservation District, Inc.

Date: March 8, 2007

1. The model developed does not seem to have real validation procedures to determine if thin layer capping or capping works over time. There should be sampling to determine capping integrity especially after major storm events or on regular intervals into the future. This should be done at every site using this technique.
2. There has not been adequate or recent testing of sediments behind CT dams or in sediment bars, especially in Lake Lillinonah. If found in the fish, it must be in the sediments either in situ or suspended in the water column.
3. The EPA stated in the Kent meeting on March 7th that the PCB's found in CT fish could be coming from "airborne sources", just like mercury from coal fired power plant emissions. This is a highly unlikely source at levels found in fish and is not supported by literature I have reviewed. Please supply some references and discussion on this point.
4. What are the MDL's (minimum detection levels used by contract, EPA or CTDPH labs testing fish and sediments? If samples had "ND" (non detects < mdl) for individual PCB's, how were they accounted for in averaging results. If a sample was below the MDL, was it considered a 0 (zero) or was the actual MDL or PQL utilized in calculations? Please provide dates, locations, lab results and calculations for CT samples.
5. If approved by the EPA, GE will utilize dredging and/or capping to treat the known contaminated reaches and sites on the Housatonic. There should be some effort to evaluate promising alternative treatment regimes in this "real world" Housatonic River corridor. The EPA should mandate pilot experimentation.
6. Every effort should be made by the EPA to remain independent of the GE engineers to ensure a thorough and non prejudicial evaluation. GE is reimbursing EPA for a majority of its expenses and there is potential to perceive this financial relationship as a conflict of interest. The current relationship needs to be transparent and openly accountable.