

## Official Comments on "Rest of Housatonic River" Proposal by General Electric Company to USEPA

From: Citizens for PCB Removal (CPR)

It was immediately apparent, from the handout supplied to supplement General Electric's Powerpoint slide presentation, at the March 6, 2007 CCC Meeting in Great Barrington, MA, that it was GE's intent to prevent people from examining their proposal too closely. The size of the reproductions of the slides on the paper, four to a page, are underwhelming, difficult to read at best, and nearly impossible to decipher the maps, graphs and data. The white space on the page speaks volumes about *GE's lack of respect for and commitment to the Rest of River stakeholders, community at large, and the environment in general.*

First, GE's data, upon which this Proposal is based is suspect for its selectivity, spottiness; it is lacking scope. As pointed out at the CCC meeting, the numbers and types of fish studied do not represent the full range of the species present in the river, especially for the varying Reaches, and particularly for the fish most often caught and eaten by fishermen along the River. Additionally, wildlife (Bald Eagles, et al.!) are not known to carefully "fillet" their fish catches; discarding any parts of prey prior to testing negates the test results. Secondly, crucial and critical areas along the River, such as areas of sediment, and bank soil near bridge abutments, dams, and confluences were not properly tested and fully studied. Neither is there adequate Connecticut data. This is imperative to both the decision at hand and the end results, particularly in regard to recontamination issues from severe storm events, high water flow or turbulence and other disturbances to the environment. CPR strongly recommends further strenuous testing for these points and inclusion and careful consideration of the results in the final cleanup decision.

Of the eight sediment and seven floodplain Alternatives in this Proposal, the most ridiculous, insulting and wholly unacceptable is proposal Number 1 in each set: "Do Nothing". This is nothing more than legal maneuvering by GE and should be rejected entirely. If GE has submitted it simply to make their lesser "cleanup" Options look better, they are greatly mistaken. Its only purpose is to make "MNR" look like a viable option. It simply reflects badly, once again, upon General Electric, themselves.

The acronym "MNR" for Monitored Natural Recovery, is simply a fancy term for also Doing Nothing, and is – likewise - ridiculous, insulting, and unacceptable, and should be rejected. Appallingly, GE's only proposed Option for any part of the River below the Massachusetts border is MNR. CPR believes that this River is one whole Living Entity, and believes the Connecticut portion of it, as well as the people of Connecticut, deserve better. CPR hopes that the large portion of the Natural Resource Recovery funds negotiated by Connecticut government officials and earmarked for Connecticut do not represent a buyout by GE in lieu of better cleanup options for the River, Watershed and People in Connecticut. Under no circumstances should the EPA allow this to be so.

The proposed "52 year period" for evaluation of the two above Options is absurd and is an obvious ploy to ensure that most if not all the current players in this process will not be alive or competent to oversee the final results. We believe the use of the number "52" as opposed to a rounder number such as 50, 55, or 60 is simply an attempt to lend "scientific-sounding" legitimacy to this proposal. It does no such thing and again is ridiculous and insulting to the (non-GE) stakeholders.

As to the six CMS Alternatives Evaluation Criteria listed on page 29 of GE slide presentation, "cost" is presumed to be defined in terms of monetary expenditures alone. Although "Cost" is listed last (#6); it is our suspicion that it is GE's number one criteria. **We ask that cost in terms of money truly be considered last in importance and not equally factored in** with the rest of the criteria. Frankly, in terms of "tomorrow's" dollars - the dollars of our grandchildren's grandchildren – "cost" will be insignificant in comparison to the health and safety of those descendents. Additionally, the monetary cost of re-remediation later will undoubtedly be even higher. The long term health and safety of people and the environment is the true price ("cost") to be paid by failing to do the fully right thing now.

As CPR emphasized at the March 6, 2007 CCC Meeting in Great Barrington, MA, the most stringent of standards for cleanup possible should be followed. Based upon the two Risk Assessment studies conducted by EPA, it follows then, that the more stringent standards designed to protect human health and safety, would therefore, also most protect the wildlife and ecosystem of the River. It is absurd to say that humans can only "safely" have .002 ppm PCB's in their tissues, while allowing fish to bear as much as 55ppm, especially since that fish could be handled and

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eaten by humans. Since we know that humans do indeed fish in the Housatonic River, despite Advisories to the contrary, the best course of action is the most protective cleanup. Furthermore, while animal reproduction was studied and included in the Risk Assessment Data as a critical decision factor, human reproduction was not. How can this be ignored? What can be more a crucial and compelling factor upon which to base this decision? Since it is presumed that this will be the only and final Cleanup of the River that GE will "willingly" finance, we want the best, most aggressive, most stringently protective and thorough Cleanup that technology offers at this time.

Since we do not have the scientific expertise ourselves within CPR, to fully evaluate the data presented in this proposal, we ask that the scientific experts at the EPA, keeping our comments fully in consideration, chose the proposal that most fully cleans the River and protects both human and non-human life, on our behalf. *Or, perhaps more appropriately, EPA should present a counterproposal that would more thoroughly accomplish these goals.* This should be within the criteria we have outlined above.

We are extremely disappointed to see that, once again, alternative technologies have been excluded from this proposal. Although our name is "Citizens For PCB Removal" that does not imply simply dredging and landfilling the contamination is fully acceptable to us. Simply putting "a rug" in the river and stockpiling toxic waste anywhere, potentially and inevitably exposing and endangering other people and wildlife, is no long-term solution. What we want is a full, final and thorough solution to this problem *now*; one that does not displace the responsibility onto the shoulders of our children, grandchildren and beyond. We urge and implore the EPA to revisit options for other technologies that address this issue, i.e., Destruction or Encapsulation. Revisit alternatives that would provide more technically cutting-edge well-paying jobs for the local economy to replace those lost by GE's withdrawal from Pittsfield. Lets put Pittsfield back on the map as a forward-headed community, make the entire Housatonic River Corridor the jewel that it can be and once was, and lead the way for a permanent, healthy solution to the pollution problems around the entire United States and the world.

Hundreds of millions of dollars, hundreds of thousands of manhours and the heart and soul of a community have been expended on this project as a whole, to date. We have come a long way from the initial stages where GE begrudgingly acknowledged that there was a problem and their role in such. The citizens of Berkshire County and Connecticut as well as the MA DEP, CT DEP and the EPA, have come too far, and have fought and worked too hard to allow GE to "drop the ball" in terms of cleanup standards and actions on the River now. We deserve better.

Lets get this done right.

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