



HVA
PROTECTING YOUR BACKYARD

March 30, 2007

Susan Svirsky
EPA Remediation Project Manager
c/o Weston Solutions
10 Lyman Street
Pittsfield MA 01201

re: CMS Comments

Dear Susan Svirsky,

I would like to send you these comments compiled by a committee from the Housatonic Valley Association. Since the process did not mandate comments for this report, we would like to thank the EPA for the opportunity to provide you with our comments and concerns over the Corrective Measures Study for the Rest of River. Overall we found the scope and the methodology proposed for the CMS to be fairly straightforward; however we do have some concerns.

Since realistically we will not see the removal of all PCBs from the river, our comments are based on minimizing additional damage to the river environment versus causing more damage to the river than what it has already gone through. Specific concerns that that we would like to address are:

Monitored Natural Recovery (MNR):

This proposal has retained MNR for evaluation for some ROR reaches. Until the CMS is submitted, we will not know whether MNR is the recommended action for any particular reach. If the CMS recommends MNR as the appropriate action, the CMS should include detailed information about the proposed scope and duration of the monitoring program. Further, if EPA ultimately approves MNR, the approval should include an ongoing public information program covering monitoring design, methods, and results.

HVA feels that monitoring should be an integral component of any remedial action, and that corrective action should be taken when monitoring data indicates a failure of the corrective measures.

Any chosen method should be considered temporary until it is proven to be effective. If it is not working, GE needs to halt activities and re-evaluate another method with EPA oversight and agreement. EPA will need to monitor the effectiveness of each method and have the ability to require corrections.

We would like to see continued monitoring of fish and habitats for at least five years or until levels are remaining the same.



We would also like to have an escrow account established to cover the costs of alternative cleanup methods if monitoring shows that remediation is warranted.

Disposal of Dredged Materials:

At this time, using backwater oxbows for disposal does not appear to us to be an acceptable alternative. Since backwaters can be highly productive habitat and critical habitat for salamanders, we feel that any such proposal be scrutinized very closely. HVA opposes wetland habitat filling and want to see no net loss of wetlands. We encourage EPA/GE to locate new landfill sites, if they are needed, in upland areas, and ideally at sites that have already been identified as being contaminated, instead of moving contaminated materials from one site to a site that is currently clean.

Dams:

For the impoundments behind dams where PCBs have already been measured, HVA believes it would be better to remove those sediments now, rather than leave them in place. We would like to see the option of restoring free-flowing stretches of the river by removing dams remain viable and not be eliminated due to the presence of PCBs behind the dam.

Regarding future maintenance, we recommend that an escrow account be established to be used in the likelihood that these dams need future maintenance, or if dredging of the dam sediment is ever required.

General comments:

We need assurances that PCB levels in the sediments won't go above IMPG standards.

We would like a clarification on why the EPA office states that "In-situ" treatment technologies are not ready to be implemented.

Restoration needs to be addressed better in the CMS and perhaps land redevelopment or redevelopment plans for these sites.

Sincerely,



Dennis Regan
Berkshire Program Director