

Tuesday, May 20, 2008

Susan Svirsky  
Rest of River Project Manager  
United States Environmental Protection Agency  
c/o Weston Solutions  
10 Lyman Street  
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Sent via email to: [Svirsky.Susan@epamail.epa.gov](mailto:Svirsky.Susan@epamail.epa.gov)

RE: EPA GE-HOUSATONIC RIVER SITE, CORRECTIVE MEASURES STUDY PUBLIC COMMENTS

Dear Ms. Svirsky,

We the undersigned urge the Environmental Protection Agency to reject the recommendations of General Electric's *Housatonic River "Rest of River" Corrective Measures Study*. Instead, we ask that the EPA require GE to follow a process that takes full advantage of new science and technology, includes meaningful community input throughout the cleanup process, and truly addresses the entire "rest of the river," from the sources of its ongoing PCB contamination in Berkshire County to its outlet in the Long Island Sound. We represent a broad coalition of environmentalists, sportsmen, municipal and other agencies, and ordinary families who work, play, and live along the river. While we are motivated by a wide range of interests and concerns, we are united in the principles set forth in this letter.

Our goal is simple: We want GE to return the river largely to the condition it was in before they polluted it. We want our families to be able to swim and fish in the river, as they once did, without fear of contamination. We want mink and otter and eagle to live and thrive on the river as they once did. We want the PCBs that GE left behind—which will not break down naturally in our lifetimes—to be permanently neutralized as threats to our communities and our environment. And we don't want all the trees cut down and the river bank turned into a construction site in the process.

#### **WHY GE'S PROPOSAL IS UNACCEPTABLE**

We recognize that the economic and technological challenges to achieving this goal are significant. We are not demanding a perfect solution irrespective of practicality and cost. However, GE's proposal will not meet the goal of undoing the damage they have done. Their "solution" is to dig up or cover over large swaths of the Housatonic and dump the highly persistent and highly dangerous contaminants in our communities and along the river itself, using the same techniques that would have been used when Love Canal was a new crisis. Meanwhile, the proposal ignores more than a hundred miles of contaminated river south of Woods Pond and does not eliminate the remaining sources of contamination that continue to release toxins into the river. And after the digging is completed, GE does not provide a credible plan to restore what will be left of the river.

GE's proposal relies heavily on the same methods that were employed 10 or even 20 years ago. It ignores current data and ongoing research supporting the creative use of new technologies. It also ignores the need for further study of the health impacts of the contaminants on the people who have been exposed to them in Massachusetts, Connecticut, and New York. We want to work with GE, and we don't expect miracles. But the current proposal can only be characterized as a failure of "ecomagination."

We are also skeptical that GE's proposal makes sense from a purely economic perspective. GE has not convinced us that dredging the river and moving thousands of tons of contaminated mud will be less expensive than employing new technologies that could potentially treat the PCBs in place. We also aren't convinced that monitoring and maintaining large landfills containing the contaminants for fifty years or more will be cheaper than technologies that may be more expensive at first but don't require the monitoring of toxic waste sites for decades. And we're skeptical that GE's cost estimates fully cover the potential expense and legal liability of leakage from those landfills. In addition to being a bad deal for the people of Massachusetts and Connecticut, the "Rest of River" proposal may very well be a bad deal for GE. We believe that the company could get better results for the community at lower cost if a more creative approach were taken.

#### **WHAT SHOULD BE DONE INSTEAD**

GE's proposal extends out fifty years, at the end of which the river will not be fully restored under any of the options that they provide. But we will learn a lot over the course of those fifty years that nobody could plan for today. Scientists will improve upon the new technologies that are becoming available for destroying PCBs, making them cheaper and more effective. We will also learn more about the details of the contamination and the river itself as the cleanup progresses. Even the very best engineers, scientists and computer modelers could not possibly create a plan for this cleanup today that will make sense even fifteen or twenty years from now.

There is a better way. The EPA can mandate a phased process that addresses the clean-up a few problem spots at a time. Each phase would include pilot testing of new technologies. At the end of each phase, the EPA and the community would evaluate the results of the experiments together, along with any other new developments, and adjust plans for the next phase. By requiring such a plan, the Agency would be honoring the commitment it made to the community eight years ago as part of the agreement that enabled the original consent decree to go forward. At a press conference in April 2000, Region One Director Mindy Luber explicitly acknowledged that the agreement "includes EPA's commitment to identify and potentially test new and innovative treatment technologies."

We urge the Agency to honor that commitment. Enclosed is a set of principles that we believe could be the basis for a productive and cooperative relationship with GE that would produce better results for the community while improving GE's brand and protecting its bottom line. We hope that the Agency will consider these principles as the foundations for any plan going forward.

Respectfully submitted,

Berkshire County League of Sportsmen - Mark Jester

Berkshire Environmental Action Team - Jane Winn

Berkshire Environmental Education Network - Jane S. Burke

Berkshire Natural Resource Council - Bryan Emmett

Berkshire Regional Planning Commission - Nat Karns

Berkshire-Litchfield Environmental Council - Star Childs

Citizens for PCB Removal - Charlie and Barbara Cianfarini

Community Development Corporation, South Berkshire - Tim Geller

Green Berkshires Inc, - Eleanor Tillinghast

Housatonic Environmental Action League - Audrey Cole, President

Housatonic River Commission - William Tingley, President

Housatonic River Initiative, Housatonic Riverkeeper - Timothy Gray

Lee Land Trust - Jan Kegler

Town of Lenox, Board of Health

Town of Lenox, Planning Board

Northwest Conservation District - Jean Cronauer, Executive Director

Stratford Action for the Environment - Charles Perez, President

Taconic Chapter of Trout Unlimited - Gene Chague

Town of Sheffield, Board of Selectmen

Rene Wendell, Conservation Ranger, Bartholomew's Cobble

Dr. Don Roeder, Berkshire Environmental Research Center

Jay Baver

Olga Weiss

Lynn Fowler

Woods and Mary Lou Sinclair

Sarah Flynn

Valerie Andersen

Michael Feldstein