

# Housatonic Environmental Action League, Inc.

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Tuesday, May 20, 2008

Susan Svirsky  
Rest of River Project Manager  
United States Environmental Protection Agency  
c/o Weston Solutions  
10 Lyman Street  
Pittsfield, MA 01201

Sent via email to: <svirsky.susan@epamail.epa.gov>

RE: EPA GE-Housatonic River Site, Corrective Measures Study (CMS), Informal Public Comments

Dear Susan,

Please accept the following comments on behalf of HEAL's board of directors and its members. HEAL is a 501(c)(3) grassroots organization which has a broad-based membership of individual and organizational stakeholders throughout the tri-state Housatonic River watershed. We have been actively involved with this EPA hybrid Superfund site since 1995. We are an all-volunteer organization with no paid staff, and are one of the primary NGOs at the site. One of our primary goals is to attempt to keep our members, other stakeholders, citizens, elected officials and governmental agencies updated on the current events of Housatonic PCB-containment.

As we have historically, upon release of the CMS, HEAL requested an extension of the public comment period and encouraged others to do the same. The CMS and its corresponding documents are over 500 pages and were years in the making. The informal public comment period was extended to May 20th....an addition of a mere 30-days to the original 30-day published period. It appears that from the front of the CMS Fact Sheet, a request for an extension may have already been anticipated by EPA and built into the process. This site has a committed and actively involved stakeholder base, with people who do read these documents. Sixty days is not even sufficient for some of the technical experts to read, analyze and comment on the larger documents. Furthermore, it is most difficult with the time EPA allots, for the various NGOs to 1) adequately disseminate the information to stakeholders throughout the watershed, and 2) to then expect citizens in any numbers to provide meaningful comments. Please review EPA's practices at this site for public comment periods and consider allowing adequate

time, particularly on large and important documents.

HEAL, as a member of the newly formed Housatonic Clean River Coalition (HCRC), helped to draft, and is a signatory to, their CMS comment letter. We support and endorse every point and principle included in the HCRC comments. With the CMS in its current form, we see no other choice but for EPA to "unconditionally disapprove" General Electric's various recommendations for remedying their multi-generational contamination throughout Rest of River.

Dr. Peter deFur of Environmental Stewardship Concepts is the technical expert to the Housatonic River Initiative. HRI is the single EPA-chosen recipient of their Technical Assistance Grant (TAG). From the EPA website: ***"The TAG provides money for activities that helps the community participate in decision making at this eligible Superfund site."*** It is usually awarded to an actively involved NGO who demonstrates broad stakeholder support and the trust of the community. Dr. deFur's professional fees are paid for with TAG funds.

HEAL supports and endorses Dr. deFur's comments on the CMS.

We look forward to EPA generating a thoughtful "adaptive management" (AM) approach to Rest of River to include PCB-destruction technologies, pilot studies in MA and CT, phased remediation, indefinite monitoring, contingency plans and enhanced public outreach and participation in MA and CT.

We appreciate the 60-day opportunity to participate (albeit informally) during this stage of the CMS.

Respectfully submitted,

Judy Herkimer

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