Housatonic Valley Association
PROTECTING YOUR BACKYARD
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May 19th, 2008

Susan Svirsky
Rest of River Project Manager
USEPA
c/o Weston Solution
10 Lyman Street
Pittsfield, MA 01201

RE: Corrective Measures Study

Dear Susan,

The Housatonic Valley Association (HVA) is dedicated solely to protecting the environmental health of the 2,000 square-mile watershed of the Housatonic River. HVA's mission is to save the natural character and health of our communities by protecting land and water throughout the watershed from the Berkshires through western Connecticut to Long Island Sound. Since the mid-seventies, HVA has been involved with the Housatonic River PCB contamination and remediation issue. We have participated in the many aspects of this issue throughout the years including the run-up to the Consent Decree and the design and implementation of restoration projects funded with National Resource Damages moneys. We have been members of the CCC since 1999 and we are a document repository. Our comments below regarding the Corrective Measures Study, set forth by General Electric (GE), state the guiding principals, preferred treatment alternatives and additional concerns of our organization.

I. Guiding Principals

While reviewing the remediation alternatives we developed guiding principles as to what we would like to see as the end result of remediation. These are: (1) Remediation should restore the river to a 'fishable[1]' and 'swimable[2]' waterbody. (2) Cleanup should be to the best ability of technology regardless of time, money and temporary aesthetic damage. A careful and thorough cleanup may require sacrificing short-term aesthetics and use of the area in order to protect this and future generations (both person and wildlife) by providing them with clean, safe and naturally beautiful river. (3) Post-remediation PCB concentrations should meet the lower range of IMPG concentrations. (4) The river should be able to flow and move as rivers naturally do. Therefore, enough bank and flood plain material must be removed to allow some meandering, rather than leaving contaminated material behind armored banks that prevent natural movement. (5) The risk of recontamination should be minimized.

II. Recommendations

Upon reviewing the CMS document, we have determined that the following alternatives will satisfy our overarching goals. However, we are open to any alternatives that meet our guiding principals.

1) In reaches 5 through 8, we prefer sediment options (SED) 5 and 6. These provide quicker remediation to the area to satisfy a 10-6 HH risk, as well as achieving a swimable, fishable river. The suggested alternative of SED 3 is composed of much Monitored

[1] We view fishable as a habitat able to consistently producing and support healthy fish consumable at a frequency of at least 15 times a year.
[2] We see swimable as a system that can support primary contact by humans.

Natural Recovery (MNR) and Thin-Layer Capping (TLC) which are not aggressive enough within reaches 5 through 8 to achieve our guiding principles. SED 5 and 6 also offer a reduced risk of recontamination (Figure 4-16a) as they use a combination of removal and capping.

2) For remediation in the Flood Plain, we believe alternative number 7 should be the preferred technique as it brings the HH risk to 10-6 and achieves the lower bound IMPGs. When access roadways are built, we would also like to see that the areas each accesses are fully remediated. Some alternatives only remove the most highly contaminated material, leaving behind a great deal of less contaminated soils. It would make more sense to remediate all contaminated material once the access roads are built and the machines are in place.
3) For the treatment and disposal of contaminated material, in the absence of an effective remedial technology, we support the use of an upland disposal landfill as long as it is located outside of the 100 year flood plain and is seen as a temporary solution with further remediation of stored material to be done as technology allows. Removal of this material could be done via the railroad. This removal option was discounted due to the cost of retrofitting the existing infrastructure. However, the increased truck traffic on local roads will increase the road maintenance budgets of the surrounding towns. We are also requesting that EPA consider revisiting the results of biogenesis when run four or five times. It seems possible that this process could reduce contamination in the material to a level that would allow the material to be reused. Costs associated with biogenesis and with road maintenance should be analyzed and compared with the upland disposal facility option to truly determine which alternative is more cost effective and which alternative assigns cost burdens to the correct party.
4) We also request that EPA consider the following:
    a. Make sure that the solution accounts for both global warming and increases in impervious surfaces that could affect flow velocities and 100 year flooding patterns.
    b. Factor in the real potential for dam removal in the future. The study was done assuming that dams such as Woods Pond and Rising Pond would remain in place forever. However, given the huge environmental movement toward dam removal and the potential for a breech if improperly maintained, we ask that the remediation be done in such a manner that removal or breech would not release large amounts of contaminants. In the event that any dams, including those in Connecticut, require maintenance that moves instream sediment, we ask that GE be required to test the material and remove contaminated material in advance.
    c. Use a phased approach to the remediation plan to allow newer and better technologies to be incorporated as they are discovered. The remediation should be held to a strict schedule, but build in regular periodic reevaluations as more advanced technologies are found, especially if they will limit the amount of destruction done to the site while still removing PCBs.

Thank you for this opportunity to comment.

Sincerely,

Marc Taylor

Lynn Werner

Marc Taylor, Board President

Lynn Werner, Executive Director