

Housatonic River Initiative

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Dear Susan,

Please find our comments on the IMPG Goals and letter sent out to the public
Comments to the Interim Media Protection Goal Report – General Electric

1. The EPA should not allow a separate set of goals to be proposed by General Electric. A costly, very long risk assessment process was set up by the consent decree governing this site. These risk assessments were joint efforts by the USEPA, General Electric, and the public. Peer reviewers were selected and approved by GE and EPA. Why now does the EPA allow goals not based on these risk assessments to be proposed by GE? If this is allowed it is a mockery of the entire risk assessment process.
- 2) The high range of the goals that are based on the ERA interpretation are extremely problematic. These proposed numbers represent an ecological community that will be left with extreme toxicity. The FDA warns of 2ppm being the limit for interstate commerce of fish. Many states and their Departments of Health regulate PCBs in fish at these low numbers. To propose as a goal, that Woods Pond fish tissue can have 43 to 92 ppms is totally unacceptable. The 3.7 parts per million number for mink is also very curious. The EPA study conducted on mink puppies showed that half of the mink puppies die at 4 parts per million. How can this number be protective of the mink population?
- 3) Soil being excavated in Pittsfield above 50 ppm has to be disposed of in a TOSCA facility. The IPEG proposal implies that levels over 50 ppm in the wildlife will be an acceptable goal. Shouldn't animals that have levels this high be regulated under TOSCA and disposed in a proper facility?
- 4) According to Webster's Dictionary a goal is "an object or end which one strives to attain". Goals are usually set to try to obtain something worth attaining. These numbers presented in both the ERA interpretation and especially the General Electric numbers set a goal that's not even worth considering. Under GE's numbers Bald Eagles will be acceptable with 93 ppm in their bodies! More TOSCA regulated material?
- 5) HRI believes the goals should 0 parts per million. This goal may never be attainable but sets the standard very high. Something that existed before GE released all of their

contamination into the river system. The Goals proposed are entirely unacceptable and if used the future of our river will be in great peril. Why are we cleaning the river at all if these numbers will be accepted as the goals?

6) The upper range of the goals for wildlife used for human consumption should be no higher than what is considered safe under current consumption advisories.

7) Even if low range fish tissue and duck breast tissue numbers based on assumptions in the HHRA are used, there is no way an angler can determine how contaminated his catch really is. Maybe its .002 based on the HHRA and an RME. Maybe its 55ppm based on alternative assumptions and a CTE. Or maybe its 185 ppm based on alternative interpretation. The government sets limits for food consumption advisories for a reason. They should be part of this equation.

8) Wildlife left with high levels of PCB body burdens may allow them to live and even reproduce but will be highly toxic if consumed by a human

9) The EPA risk assessments did not address the synergistic effects of exposure to other chemicals at this site. The synergistic effects that might come from PCB site exposure coupled with the already increasing body burden of chemicals ingested from the food chain suggests that EPA should be extremely cautious about allowing high ppm levels in Wildlife used for human consumption.

Thank You

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