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May 19, 2008

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

Dear Ms. Svirsky:

The purpose of this letter is to provide the U.S. Environmental Protection Agency with formal comments from the Massachusetts Department of Public Health, Bureau of Environmental Health (MDPH/BEH) regarding the Corrective Measures Study (CMS) submitted by General Electric (GE) for the Housatonic River Site, Rest of River.

As you know, MDPH/BEH has been involved in addressing public health issues related to widespread contamination in the Housatonic River Area (HRA) since the early 1980s, when we issued a public health consumption advisory for fish, frogs, and turtles for the Housatonic River based on elevated levels of polychlorinated biphenyls (PCBs). In addition, MDPH/BEH completed a PCB Exposure Assessment Study in 1997, issued a public health waterfowl consumption advisory in 1999, convened an Expert Panel designed to address health questions regarding widespread PCB contamination in 2000, conducted a cancer incidence evaluation for five HRA communities in 2002, and has conducted more than 10 site-specific public health assessments and consultations related to GE site contamination through a cooperative agreement with the U.S. Agency for Toxic Substances and Disease Registry (ATSDR). Between 2005 and 2007, MDPH/BEH conducted an environmental exposure analysis and offered serum PCB testing to concerned members of the Allendale Elementary School community in response to PCB exposure concerns associated with the PCB consolidation area, Hill 78. MDPH/BEH continues to work closely with the Pittsfield Board of Health and our Housatonic River Area Advisory Committee (HRAAC) in responding to and evaluating community concerns related to PCB exposure opportunities.

The MDPH/BEH evaluated GE's Corrective Measures Study in the context of potential public health impacts.

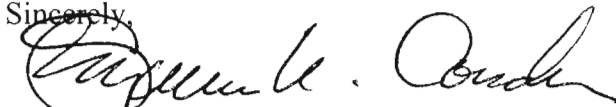
We believe that the goal of remedial activities for the Housatonic River, Rest of River should be to return the environment to conditions prior to PCB contamination by GE. As recommended in our Public Health Assessment for the Housatonic River released for public comment in November 2007, such conditions should include the ability to consume fish no longer contaminated with elevated levels of PCBs as well as a range of other recreational activities associated with this once bucolic area of our state. It is therefore disconcerting that the predicted post-remediation PCB concentrations for all presented alternatives would not be able to achieve this goal for fish consumption in Massachusetts. Thus it would appear that under all scenarios presented by GE, fish consumption advisories must remain in place in perpetuity.

MDPH/BEH also is concerned that the remediation of the Rest of River be conducted in the safest manner possible to minimize exposure opportunities to PCBs. It is expected that any dredging and removal activities would result in elevated exposures and risk and therefore, use of innovative technologies to address PCBs in place is critical.

Finally, the CMS contains no specific information regarding a location for an upland disposal facility or transportation plans for dredged sediment and floodplain soils. Without this information, it is impossible to fully evaluate potential exposures and public health impacts associated with any proposed remedial actions.

Thank you for the opportunity to submit comments on GE's proposal. If you have any questions about the above comments or wish to discuss them further, please feel free to contact us at 617-624-5757.

Sincerely,



Suzanne K. Condon, Associate Commissioner
Director, Bureau of Environmental Health

Cc: Martha J. Steele, Deputy Director, BEH
Meg Blanchet, Assistant Director, BEH Environmental Toxicology Program
Julie Cosio, Senior Environmental Analyst, BEH Environmental Toxicology Program
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