

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

New England
1 Congress Street, Suite 1100
Boston, MA 02114-0969

MEMORANDUM

DATE: March 3, 2005

SUBJECT: CSTAG Updated Recommendations on the Housatonic Rest of River Contaminated Sediment Superfund Site, Regional Response

FROM: Susan Svirsky, Project Manager,
GE/Housatonic Rest of River

TO: Stephen J. Ells
Leah H. Evison, Co-chairs
Contaminated Sediments Technical Advisory Group (CSTAG)

Background

On October 13, 2004, the CSTAG met in Fairhaven, MA and the Region provided the CSTAG with an update on the progress being made at the site. This meeting included a discussion of how the previous CSTAG recommendations were being addressed by the Region.

CSTAG Updated Recommendations

The CSTAG provided a series of updated recommendations to the Region in a memorandum dated 11/15/2004. Generally, the CSTAG felt that their previous recommendations are being carefully considered, and anticipate that the Region will continue to address the 11 risk management principles throughout the rest of the remedy evaluation and selection process. The CSTAG offered the following additional comments for consideration. The Region appreciates the continued input from the CSTAG and has provided a response to each of the comments below.

Principle #1, Control Sources Early

- The CSTAG urges the Region to work closely with the State concerning changes to the current NPDES permitted discharges to the River near the site. New permits should strive to minimize to the extent practicable any release of PCBs, not just require monitoring of PCB releases. PCBs in these permitted discharges could compromise some of the environmental improvements being made at the site.

Response – The Regional project staff have discussed the changes to the NPDES permit with the Regional NPDES staff. The draft permit is out for public comment. EPA and the State will issue the permit jointly.

- The CSTAG also encourages the Region to actively work with the State to quickly remediate the contaminant releases from Unkamet Brook area to the East Branch of the River as the longer contamination from this area is released to the river, the more the opportunity exists to adversely recontaminate areas that have been or are currently being cleaned up by the removal program.

Response – EPA is providing the oversight of the work being performed by GE at Unkamet Brook, and the schedule for the investigation and cleanup was established through the Consent Decree process. The Pre-Design activities by GE are underway and the report will be submitted this year. Following review of the report, GE will submit a Conceptual RD/RA Workplan, and subsequently the Final RD/RA Workplan. Remediation is scheduled to begin in 2007.

- The CSTAG also encourages the Region to work with the State in order to quickly remediate contaminant releases from the Dorothy Amos Park area to the West Branch.

Response – The State has sent a letter (with EPA input) to GE requiring that GE submit a proposed scope of work for further response actions for PCBs in riverbank soil and sediment adjacent to the Park.

Principle #5, Use an Iterative Approach in a Risk-Based Framework

- The CSTAG recommends that the project team expand its upstream biological monitoring activities in order to more fully evaluate the effectiveness of the completed upstream response actions. This information may be useful in predicting how effective sediment removal may be in the rest-of-river.

Response – The EPA project team will work with GE to continue their ongoing monitoring program. The EPA project team will develop a long-term monitoring program for the 1.5 Mile when the remediation nears completion. The project team anticipates that this plan will include some biological monitoring. Implementation of the monitoring plan will be dependent on available funding.

If you have any questions regarding our response to the CSTAG comments or any other activities please call Susan Svirsky at 617.918.1434 or Dean Tagliaferro at 617.918.1282.

cc: Rich Cavagnero, EPA NE
Larry Brill, EPA NE
Bob Cianciarulo, EPA NE

Dean Tagliaferro, EPA NE
Tim Conway, EPA NE
Michael Cook, EPA OSRTI
Charles Sutfin, EPA OSRTI
Elizabeth Southerland, EPA OSRTI
Rafael Gonzales, EPA OSRTI
Information Repositories