



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

*Signed 11/15/2004*

MEMORANDUM

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

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

TO: Susan Svirsky, Site Project Manager  
Region 1

**Background**

OSWER Directive 9285.6-08, *Principles for Managing Contaminated Sediment Risks at Hazardous Waste Sites* (Feb. 12, 2002), established the CSTAG as a technical advisory group to “monitor the progress of and provide advice regarding a small number of large, complex, or controversial contaminated sediment Superfund sites.” The main purpose of the CSTAG is to help Regional site project managers appropriately manage their sites throughout the Superfund process in accordance with the 11 risk management principles set forth in the OSWER Directive. The Directive also stated that the CSTAG should provide annual follow-up on these sites until the ROD is signed and then periodically thereafter until all the remedial action objectives have been met.

On October 13, 2004, the CSTAG met in Fairhaven, MA and the site project manager provided us 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 project manager.

**CSTAG Updated Recommendations**

Based upon the information provided to the CSTAG, we feel that, generally, our previous recommendations are being carefully considered, and we anticipate that the site project manager will continue to address the 11 risk management principles throughout the rest of the remedy evaluation and selection process. We do, however, offer the following additional comments for consideration. The project manager should provide a short response to the CSTAG within 30 days. As with the initial recommendations they, and the Regional response will be posted on the CSTAG web site.

### 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.
- 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.
- 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.

### 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.

cc: Rich Cavagnero, Region 1  
Larry Brill, Region 1  
Dean Tagliaferro, Region 1  
Michael Cook, OSRTI  
Charles Sutfin, OSRTI  
Elizabeth Southerland, OSRTI  
Rafael Gonzales, OSRTI