From: Toby Berkman
To: Tobias Berkman

Cc: Illustrious Ewhorlu; Fontaine, Joshua; Brooks, Ashlin; Dumville, Kelsey; Carli-Dorsey, Alexander; Draper, Lauren

Subject: Message from EPA on CCC Member Request Regarding EJ

Date: Tuesday, November 12, 2024 5:17:25 PM

Attachments: PastedGraphic-3.tiff

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Dear CCC members,

Please see message below from EPA.

Regards, Toby

Message from EPA:

During the October 9, 2024 meeting, a CCC member requested that Carol Tucker, EPA's Director of the Environmental Justice, Children's Health and Environmental Review Division, attend a future meeting with the CCC. The EPA Case Team met with Carol Tucker in response to this request.

While the Environmental Justice Division within EPA is new, attention to environmental justice (EJ) concerns has consistently been an integral part of the EPA's work for the GE-Pittsfield/Housatonic River Site, including Rest of River. EPA Community Involvement Coordinators have been the lead on evaluating EJ concerns, and the whole EPA Case Team has taken EJ into account throughout the site evaluation, remedy selection, and cleanup process. The EPA Case Team, including the Community Involvement Coordinators, consults with the EJ Division as needed and will continue to do so. Therefore, the EJ Division is sufficiently represented by the current EPA Case Team.

A misconception regarding EJ is that if EJ communities are present within the Berkshires, the proposed Rest of River Cleanup cannot proceed. This is incorrect. EPA evaluates areas of EJ and if EJ communities are present, EPA completes additional consideration, analysis, and/or outreach. In practice, EPA has conducted extensive outreach for the Site, as outlined in the EJ guidance. EPA is keenly aware of the impact that the cleanup may have on the community. EPA is requiring that GE take significant steps to address those concerns in GE's revised Quality-of-Life Plan, due on November 22, 2024. The revised Quality-of-Life Plan will be open for public input. Additionally, the revised On-Site and Off-Site Transportation and Disposal Plan is currently out for public input until January 15, 2025. This plan was significantly revised based on comments EPA received from the Municipalities, the CCC, and the public.

Finally, EPA notes that the selected remedy, which went through formal public comment after extensive outreach, serves all the River communities, including any EJ communities, by removing uncontrolled contaminants that present human health and environmental risks and safely consolidating the waste in the Upland Disposal Facility in the Town of Lee. EPA has conducted, and will continue to conduct, enhanced and additional outreach and public meetings well beyond what is required and similar to what would be done for EJ communities.

EPA, for example, holds public input periods on GE's technical plans and considers public input when acting on those plans. This is not done at most Superfund sites.

On another note, Ashlin Brooks will be transitioning the EPA Community Involvement Coordinator role to Kelsey Dumville and Lauren Draper at the end of the year. Please feel free to contact R1Housatonic@epa.gov if you have any questions about this transition.

Sincerely, The EPA Case Team



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