

Housatonic Environmental Action League, Inc.

Raising Awareness – Sharing Knowledge – Bridging Advocates

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November 17, 2021

From:

HEAL <healct@snet.net>

HRI <housriverkeeper@gmail.com>

To:

Dean Tagliaferro

United States Environmental Protection Agency

sent via email: <tagliaferro.dean@epa.gov>

RE: Public Comments on

Biota Consumption Advisory Outreach Plan for Housatonic Rest of River - Connecticut

Dear Mr. Tagliaferro:

Please accept these comments on behalf of Housatonic River Initiative, Inc. (HRI) and Housatonic Environmental Action League, Inc. (HEAL).

The document is difficult to read in hardcopy due to small text size.

There is no mention of measurable goals and objectives in order to develop criteria to determine if the biota consumption advisories are effective, and with the desired outcome of actually preventing harm from consuming PCB-contaminated biota. Without such metrics, how will EPA and CT know if the exercise of posting signs and handing out pamphlets is educating only, educating with avoidance action, continuing harm by consuming contaminated fish? We believe signage and pamphlets are just another vacant Institutional Control used in this case to keep Connecticut as the receiving state, and receptacle for GE's toxins.

Pamphlets should go to all fish license locations. How ineffective to have GE choose only a handful of license outlets to distribute advisories. Someone far from the Housatonic River could purchase a license in their town, with plans to fish in the Housatonic. No outlet in Naugatuck (or many other locations) are listed. Only one license outlet is listed in Danbury.

Institutional Controls are ineffective, and serve only as window dressing for GE to avoid a real comprehensive removal action. Of course, CT DEEP and DPH continue for decades to bemoan budget constraints, thus preventing them from keeping citizens safe.

How many years has CT issued consumption advisories?

Due to constantly changing demographics, additional languages (e.g. Portuguese, most prevalent African language, Pashto/Persian, etc.) need to be added to the visually overwhelming (and likely ineffective) foreign language signs.

The report needs to provide additional maps of smaller areas showing specific sign locations...maps that does not require GPS.

The provided links to web pages for the pamphlet should incorporate a counter to determine the number of hits on each page. Institutional Controls exist only for the benefit of an irresponsible RP like GE, and for EPA to close a site (albeit still contaminated) in order to satisfy both EPA Headquarters and the RP.

There are 149 Housatonic River miles in CT. It appears the CT section will get 125 signs. That's less than one sign for each mile of river, and ON ONLY ONE SIDE OF THE RIVER. Both sides of the river need to be signed in areas where anglers are able to access, WHETHER OR NOT THEY ARE LEGAL ACCESS POINTS.

The advisory signs are dumping plastic into the system as they degrade. GE has plenty of resources to come up with a sign material that biodegrades. Even metal would be more ecologically sound. Furthermore, UV ink rapidly fades. Another ink should be chosen that is as non-toxic as possible, and that does not fade as quickly.

If 2022 or later is the anticipated time frame for this dubious exercise, then there is plenty of time for CT to honor their longstanding commitment to use Universal Symbols and fish diagrams. Tell GE that Connecticut citizens, mothers, children, anglers deserve as visually impacting and easy to understand signs as other sites have that are also forced to accept Institutional Controls. See examples of more effective signs at the below links.

<https://ecoreportcard.org/report-cards/willamette-river/indicators/fish-consumption-advisories/>

<https://deohs.washington.edu/srp/fish-consumption>

<https://appliedecology.cals.ncsu.edu/fish-consumption/>

Why are not all the thermal refuge tributaries included for signage ON BOTH SIDES of the watercourses? To name a few in and close to Cornwall: Mill Brook, Push Em Up, all of Furnace Brook's parking/fishing areas, Gunn Brook, Carse Brook, Bonney Brook, etc. Also, there will apparently be a sign at the blast furnace in Norfolk below the dam. However, there is a fish ladder at the dam. There should also be signage above the dam. The Blackberry River had a GE capacitor factory abutting that river upstream from the dam; PCBs were used at that factory to fill small capacitors. That site has never been adequately characterized.

Our organizations do not want GE involved with EPA, DEEP, CT DPH, or any other state agency in order to: "support other, related educational and outreach activities"... "providing information or technical assistance"... "development of public service announcement on their website"... "holding public meetings"... "use of QR codes on the advisory signs"... etc.

All our members want is a fishable, swimmable, livable, and breathable watershed. A watershed that is reliably protective of ecological and human health.

Conclusions

The data behind the advisories are old, and getting older every day. With climate change flooding, CT is receiving untold loads of contaminated sediment. During future major removal actions in Rest of River, CT will also experience PCB spikes then (and a toxic soup of other chemicals that GE dumped, or are still leaking from numerous places from the defunct plant and other places where they dumped). A few surprising additional fish species have been added to the consumption advisory in CT over the years. More fish species (including bottom feeders), amphibians, benthics, duck, and receptor mammals should be sampled now, and during the reliable future spikes.

The signs, advisories, and pamphlets in their current form are dated, if not accurate. Using diagrams and Universal Symbols (as DEEP committed to) is easier to read, and better engages citizens, particularly those who consume fish and other species from the river system.

Thank you for the opportunity to submit comments.

Sincerely,
Judy Herkimer, HEAL
Tim Gray, HRI