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October 23, 2014

Dean Tagliaferro
EPA New England
c/o Weston Solutions
10 Lyman Street, Suite 2
Pittsfield, MA 01201

Via Email: r1Housatonic@epa.gov

Dear Mr. Tagliaferro:

Thank you for the opportunity to provide the U.S. Environmental Protection Agency (EPA) with comments from the Massachusetts Department of Public Health, Bureau of Environmental Health (MDPH/BEH) regarding EPA's June 2014 Proposed Remedial Action for the 'Rest of River' component of the GE-Pittsfield/Housatonic River Site.

As you know, MDPH/BEH has been addressing public health issues related to widespread contamination in the Housatonic River area since the early 1980s. Thus, the MDPH/BEH[1] has evaluated the current EPA proposed plan (i.e. selection of Combined Sediment/Floodplain Alternative 9 and Treatment/Disposal Alternative 1) in the context of potential public health impacts. The following comments are focused on minimizing human exposure and protecting public health.

[1] This work was supported in part by funds from a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Department of Health and Human Services. This document has not been reviewed and cleared by ATSDR.

1. Human Consumption of Fish, Frogs, Turtles and Waterfowl

Consistent with our previous comments on General Electric's (GE) Revised Corrective Measures Study for the Rest of River, MDPH/BEH believes the long term goal for remedial action should include restoring the River to conditions that will allow for the consumption of fish, frogs, and turtles, and waterfowl no longer contaminated with elevated levels of polychlorinated biphenyls (PCBs). EPA's selection of Combined Sediment/Floodplain Alternative 9 is anticipated to reduce downstream transport of PCBs by 89% and result in reduced PCB biota concentrations to a performance standard of less than 1.5 mg/kg fish tissue in all reaches. However, while average fish (fillet) PCB concentrations are projected to fall below 1.0 mg/kg in some reach areas, it does not appear the proposed plan will ever completely eliminate the long-term need for consumption advisories that are protective of sensitive populations. Given the inherent uncertainty in estimated (i.e., model projected) biota concentrations, MDPH/BEH strongly recommends EPA require implementation of a robust sampling program for fish, frogs, turtles and waterfowl (e.g. duck breast) in the Housatonic River and its tributaries. The data generated from such sampling would help determine how valid the modeled concentrations of PCBs in fish are and help to ensure consumption advice remains adequately protective for all populations both during and long after completion of the Rest of River remediation. In addition, MDPH/BEH recommends EPA ensure that signage providing existing consumption advice to the public be diligently monitored and maintained during all phases of remedial action.

2. Local Impacts During Remediation

MDPH/BEH anticipates any removal and capping activities associated with remediation of sediment and floodplain soils could result in potential increased exposure opportunities and risks in the short-term if measures to minimize local impacts are not adequate. Attachment D to the Draft Permit for the draft determination lays out broad conditions that EPA has determined are protective of human health however detailed and site-specific measures are not delineated. MDPH/BEH recommends EPA and General Electric (GE) carefully coordinate with local officials (including local health departments) and conduct outreach to residents to ensure that exposure opportunities (as documented with concurrent air monitoring) or nuisance conditions that may arise during phased removal and capping activities or through temporary storage or trucking of dredged material will be effectively minimized or eliminated.

3. Human Exposure in High Priority Habitat Areas

A notable component of the EPA proposed remedial action plan is the inclusion of certain targeted measures and procedures designed to preserve and protect the river's sensitive ecosystem in core habitats for state-listed species. Such measures and procedures should include the consideration of human health to the extent they are impacted by ecological restoration activities. For example, a quantitative consideration of the impacts of uncertainty in all aspects of the "Rest of River" plan (i.e. human health and ecological risk assessments) is warranted. As the proposed efforts include the use of a secondary remediation target (e.g. 10^{-4} cancer risk), shallower removal depths, and consideration of non-excavation cleanup

methods in areas where state-listed species of concern are located, ensuring institutional controls (e.g. signage) are maintained during all phases of the remediation process is necessary. MDPH/BEH also recommends EPA take steps to ensure any eco-sensitive areas that may be accessed for recreational purposes post remediation are adequately signed to inform individuals about possible risks associated with exposure to PCBs in soils/sediment.

4. Treatment and Disposal of Excavated Materials

MDPH/BEH supports EPA's proposed treatment/disposition plan (TD1) for offsite disposal of excavated material to an existing licensed disposal facility (which currently exists out-of-state) and the use of rail transport to reduce truck traffic. However, the EPA proposal does not include specific details regarding the siting of a rail facility and/or information regarding the locations of any temporary storage or consolidation area(s) for excavated material during the phased remediation within the individual reach areas. MDPH/BEH recommends these siting decisions incorporate the use of available public health data to carefully evaluate potential health burdens to local populations.

In summary, MDPH/BEH appreciates EPA's efforts to propose a Remedial Action plan for the Rest of River that will be conducted in a manner that prioritizes protection of public health balanced with preservation of the natural ecology. As described above, more information is necessary to fully assess the adequacy of plans to protect public health in smaller geographic areas during active remediation and over the long term. MDPH recommends 1) a robust long-term monitoring plan to better understand the uncertainty of projected biota concentrations and ensure adequate protection of public health, and 2) close coordination with health officials at the local level to ensure short-term exposures are controlled and long-term exposures are reduced in the spirit of returning the Housatonic River to conditions prior to PCB contamination.

Sincerely,

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

Cc: Martha J. Steele, Deputy Director, BEH
Marc A. Nascarella, Director, BEH Environmental Toxicology Program
Meg Blanchet, Assistant Director, BEH Environmental Toxicology Program