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October 24, 2014

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

Subject: Comments to Rest of River Remediation Plan

Dear Mr. Tagliaferro;

We believe the subject plan as described in the Draft Permit and Statement of Basis is incomplete and does not justify our support.

Our objection is the plan does not contain detailed implementation requirements and/or constraints on the remediation activities that could affect the quality of life in our neighborhood and other neighborhoods in Berkshire County located near the river. In particular the Permit does not describe in any detail:

- + Major public roads and residential streets to be used for the transport of PCB sediment and clean fill
- + The location of temporary roads, access points, staging areas and temporary storage sites
- + A plan for staging the clean up into small sections of the river in order to minimize individual neighborhood disturbance
- + Limitations on working hours, noise levels and traffic load
- + A system to monitor and report on PCBs and other pollutants released into the atmosphere; and PCB contaminated soil spilled on highways and residential streets during the clean-up process
- + Comprehensive communication methods, in addition to a web site, to inform the residents of remediation activities and status
- + A process to involve state and local officials and concerned citizens in clean up activities
- + The pathway PCB sediment is to travel from the river site to the final disposal area

These concerns are, in part, mentioned in the Permit Section 11 describing the SOWs and in the Potential Community Impacts Section on Page 10 of the Statement of Basis. The key word here is "mentioned". There are no specific proposals to address these issues in the Permit or the Statement of Basis. Only vague generalities are contained in these documents.

As shown in Figure 1 (Summary of Rest of River Consent Decree Process) in the Statement of Basis, the Final Cleanup Decision is based on the Proposed Plan, which is subject to Public Comment and an Appeals Process. Once the final clean up decision is made, remediation begins. The time to identify and alleviate potential neighborhood concerns is now during this consent decree process. Correcting problems raised in the future by neighborhood residents during the actual remediation will become more difficult to resolve than if potential issues were anticipated and addressed before the final clean up decision.

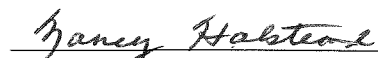
A new section should be added to the Permit or Statement of Basis to address our concerns. The Housatonic River from Fred Garner Park to Woods Pond has been studied, surveyed and mapped in great detail. The EPA is staffed with competent environmental scientists, engineers and managers some of whom are sure to have extensive experience with this type of project. We do not understand why our concerns cannot be addressed.

Attached to this letter are additional comments to the plan.

Thank you for your consideration.

Sincerely,

  
\_\_\_\_\_  
Thomas Halstead

  
\_\_\_\_\_  
Nancy Halstead

Attachment: Additional Comments to Rest of River Plan.

**GE Facility Map in Attachment A of the Permit**

This map should be updated to show removed buildings, new buildings and new ownership of some of the property, or the text should refer to the "Former GE Facility".

**Measurement of PCB Flux At Woods and Rising Pond**

The technique for measuring PCB flow over the dams should be described. How results are to be measured is an important consideration of a specification.

**Woods Pond Filter**

The Statement of Basis on Page 7 solicits comments on other Woods Pond options. A potential option could be to explore the use of a mechanical filter on the overflow. PCBs are not in the water column but in the sediment. The filter would shuttle clear water down river and leave behind sediment, which could be processed to remove PCBs or sent by rail to a disposal site.

**Differences in Corrective Measures between Reaches 5A, 5B and 5C**

The rationale for the difference in the corrective measures for each of the three sub-reaches should be described in the Statement of Basis. For example, riverbed sediment in Reach 5A >5ppm is removed. In Reach 5B, sediment >50ppm is removed. The boundaries dividing the reaches do not appear to have anything to do with contamination levels or distinctive attributes of each sub-reach, which could justify the differences in the cleanup standards.

**Use of Climate Change as a Design Parameter for the Engineered Cap Erosion Protection Layer**

The concern is river flow may greatly increase as a potential result of climate change and damage the cap. A quantitative safety factor should be specified. For example, "the cap should withstand X times the present maximum river flow" could be used rather than using a term like "climate change" whose definition in regards to river water flow is open ended.

**50-PPM Cleanup Standard**

Throughout the Permit 50-PPM is used as a threshold number for action to be taken. For example, on Backwaters if contamination is >50 PPM, sediment is replaced. Apparently, if less than 50-PPM cleanup is not required. The Statement of Basis should discuss this number's origin.

Another issue is what happens when a flood occurs. For example, will sediment of 40 PPM in back waters end up in flood plains whose cleanup standard is less than 40 PPM?

### **Complexity of Flood Plain Standards**

Using Table 1 and Figure 3 to understand the level of clean up to the flood plains is difficult. The computations for RME and HI and the resulting Cleanup Standard for each Exposure Scenario are impossible to understand. A few computational examples would increase the understanding of these numbers for the general public.

The exposure areas on the figures are broken down into too many sub sets. On the tables they seem to end up in large groupings for a specific area. It is difficult to go from the figure to the table in order to determine clean up levels.

To simplify, define three types of flood plain sections with a cleanup standard for each area. The first type would be used by young children and have a cleanup standard of 5ppm, which is the standard for children in Table 1. A second type would be the frequently used flood plain sections with a clean up standard of 10ppm, which is slightly less than the average of the standards in Table 2. The third type would be all of the rest of the flood plain with a cleanup standard of 25ppm, which is half of the 50-PPM threshold mentioned above.