



B.E.A.T. Working to protect the environment of Berkshire County

March 30, 2007

[Susan Svirsky](#)

EPA Rest of River Project Manager
c/o Weston Solutions
10 Lyman Street
Pittsfield MA 01201

re: CMS Comments

Dear Susan Svirsky,

Please accept the following comments from the Berkshire Environmental Action Team, Inc.

1. Modeling - I, Jane Winn, BEAT's Executive Director, attended and spoke at the Peer Review Panel for the model "validation". At that meeting, it was absolutely clear to me that the panel said the model might be valid to use to compare technologies, but that it was not a valid predictor or any outcome. It was not clear to me that the Peer Review Panel thought the model would even be valid for comparing different technologies when it came to bioaccumulation or PCB fate and transport.
2. Alternative Technologies - From our understanding, the Consent Decree specified that alternative technologies would be considered. It appears that alternative technologies that are being used elsewhere, both in the United States and abroad, are not being considered for the Housatonic River. We feel that the people along the Housatonic are being threatened with – either go along with the do nothing option for the floodplain, or we'll destroy everything along the riverbanks and leave you with rip rap all along the riverbanks. We do not think those are the only options, but we do think that is the way this Corrective Measures Study sets up the choices. We ask EPA to put in writing that even if alternative measures won't for some reason be considered right now, that the EPA will consider any alternative remedial technologies that in the future might prove to remediate PCBs from floodplains.
3. Alternative Technologies – We would hope that EPA might consider pilot tests of

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Alternative Remedial Technologies that appear to work and have little to no potential to do harm to the environment.

4. Source Control - While BEAT is pleased to see remediation moving forward on all fronts, we are terribly discouraged that source control has not moved forward in a more timely manner. There is nothing we can do about the fact that this process did not start at the top and work down. We appreciate the fact that GE is now, finally, measuring the flow of Unkamet Brook. This will allow some calculation of how many PCBs are entering the Housatonic River at the farthest upstream source that we are aware of. We still do not have adequate flow data for the outlet of Silver Lake. This is unconscionable given the failed capping test currently under way. Please require the same kind of flow data to be collected on the outlet of Silver Lake. Every pipe that GE monitors under there expired NPDES permit was still sending PCBs into the river. Why can that not be stopped? This doesn't even take into account all the buried PCBs that may leach into the river. Source control is imperative.
5. Capping - Cover up should not be an option. The idea of capping in the river is not an option we would ever consider viable.
6. Dams - There should be thorough testing behind all the dams to determine the extent and level of PCBs behind each. Again, cover up should not be an option.

Sincerely,

Jane Winn, Executive Director