

HRI

Newsletter

WHERE DO WE GO FROM HERE?

On February 22, 2000, the Housatonic River Initiative, (HRI), filed a pro se motion to intervene in the lawsuit between GE, the United States, the State of Connecticut, and the Commonwealth of Massachusetts to strengthen the agreement the environmental agencies negotiated with General Electric. Soon after, as the first public intervenor, we faced a firestorm of criticism from the Berkshire Eagle, the corporate and banking community of Pittsfield, and former EPA administrator John DeVillars. We were charged with endangering any chance for a clean river; told repeatedly that GE would use such a legal challenge to walk away from the deal; and warned that the river would never be cleaned. Board Member Rep. Chris Hodgkins and HRI Executive Director Tim Gray received the harshest criticism, and were the targets of personal attack. Most of the environmental community fell silent during this period, though thankfully many of our members expressed written, financial, and vocal support.

The HRI Board of Directors was deeply affected by this, and much discussion and debate took place over the months as each Board Member tried to determine what we had won with the Consent Decree, what we had lost, and what was at stake if we should prevail in Court. We began negotiations with the governmental agencies to see whether we could win additional improvements to the Consent Decree, sitting across the table from a small army of representatives and attorneys from the U.S. Department of Justice, the U.S. EPA, the Massachusetts DEP, the Connecticut DEP,

the U.S. National Oceanographic Atmospheric Administration, and the Massachusetts Attorney General Office.

Needless to say, we were outgunned, though we brought spirit and two decades of accumulated knowledge about the site and a strong determination to get the best possible clean-up not only for the river but of the many other contaminated sites in Pittsfield. A month of exhausting negotiation resulted in a list of 11 demands the Agencies were willing to accept in return for our withdrawal of the motion to intervene.

SNAPPING TURTLE WITH EGGS

The list includes: the EPA's agreement to evaluate whether or not to conduct a pilot project for treatment technologies in the Rest of the River section; an intensified effort via meetings and the EPA's website to make public clean-up performance standards, results of sampling, etc.; actively soliciting public comment on the design for the cap system in Silver Lake; open house tours of the entire site, including on-going clean-up activities on GE property; more extensive sampling of the West Branch of the Housatonic, including the King Street dump; and EPA's agreement to provide a letter to homeowners with contaminated property, stating that the EPA would not pursue innocent homeowners for liability with respect to GE-related contamination.

Rep. Hodgkins negotiated additional support for contaminated property owners with the Pittsfield banking community, including a three million dollar fund to provide mortgages and loans.

After a meeting in late April after many hours of intense discussion, the Board voted 7-5 to withdraw the motion to intervene and to accept the negotiated agreement with EPA. Several Board Members made the point that even though we were withdrawing our court action, our official comments to the Consent Decree would still have to be considered by the EPA and would go before the Court.

Several parties are still challenging the Consent Decree in Federal District Court before Judge Ponsor, including the Housatonic Environmental Action League (HEAL) of Connecticut; the Schaghticoke Indian Tribe of Connecticut; a group of contaminated Housatonic River property owners; and owners of contaminated commercial property in Pittsfield.

On July 20, 2000 the U.S. Department of Justice officially asked Judge Ponsor to enter the Consent Decree, stating:

“The Consent Decree is a fair and reasonable resolution of claims against GE, comports with the objectives of CERCLA, RCRA and the CWA and is in the public interest. The public comments submitted in this action do not show that entry of the Decree is improper, inadequate or not in the public interest. The Court should defer to the agreements reached in the Decree, and enter the Decree as a final judgment.”

Exhibit 2 provides EPA's answers to some of our concerns: “Several commenters object to the Consent Decree on the grounds that the commenters were excluded from the negotiating process, that the negotiations were conducted in private, and that certain information regarding the negotiations continues to be maintained in confidence. It is well settled in law and policy that it is appropriate for the government to conduct private

negotiations. Without the ability to discuss the possibility of settlement, and engage in a bargaining process, settlements could not be attained. In this case, the government provided the public with more information and access to the negotiations than is required by law or policy. The commenters seek privileges or rights beyond what is contemplated by law or government policy.

As regards the government's decision to provide GE covenants not to sue in exchange for cleanup action and reimbursement for the monies the agencies have spent, Lois Schiffer, the Assistant Attorney General of the Environment and Natural Resources Division of the Justice Department wrote:

First, the future liability covenants not to sue provided GE do not take effect until EPA certifies that a particular removal or remedial action is complete. Second [they] are subject to satisfactory performance by GE of its obligations under the proposed Consent Decree. Third, the proposed Consent Decree includes reservations by the United States of its rights to pursue GE for future liability if new information or previously unknown conditions, together with any other information, indicate that a Removal Action or Remedial Action is not protective of human health and the environment. In addition, to respond specifically to a particular concern about PCBs being found to be a greater health risk in the future, the proposed Consent Decree addresses EPA's ability to pursue the reopening in such a situation.

The government wrote: the government weighed the benefits of the proposed settlement against the cost, time, and likelihood of success of litigation, and potential remedies associated by unilateral EPA action. In this case, the government decided that the proposed Consent Decree offers far more benefits compared to the costs and uncertainties associated with litigation.

In its Memorandum in Support of Its Motion to Enter the Consent Decree the government states: Not only is the settlement fair, it is reasonable. Reasonableness is evaluated in three ways: technical adequacy, adequacy of the settlement to compensate the public; and how well the settlement reflects litigation risks and other considerations. The Decree passes these tests with flying colors."

NORTHERN LEOPARD FROG

First, the various response actions that have been and will be performed at the Site are adequate to address the contamination. EPA used its best technical judgment and selected a series of response actions that will be protective. **The various concerns identified by commenters were considered by the Agency and do not raise any serious issues.**

Second, the settlement adequately compensates the public. The United States will recover 90% - 97% of the expected site costs through cost recovery and work. In addition, the Decree includes a natural resource damage package worth over \$25 million. The overall settlement goes far beyond what would be required to demonstrate adequacy of compensation. (Pg. 9) (Emphasis added).

ANOTHER SIDE OF THE STORY

Those who continue to challenge the Consent Decree interpret the settlement differently. According to the Amended Complaint of Moldmaster Engineering, Vincent Curro, and Vincent Stracuzzi, business commercial property owners located on Newell Street:

GE not only caused massive and widespread PCB contamination through its activities during the decades when it used PCBs at its Pittsfield, Massachusetts operations, but GE continues to do so because PCBs misused and mishandled by GE continue, and will until abated continue, to be released into the environment. The acts alleged against the United States and the Commonwealth of Massachusetts involve the entering into a settlement agreement with GE which will result in the unconstitutional taking of plaintiffs-intervenors properties, if approved by this Honorable Court.

The complaint argues:

137. The Commonwealth of Massachusetts and the United States became aware that the Quality Printing Property located on Newell Street was heavily contaminated with PCBs in 1987, and failed to require GE to conduct an extensive investigation of the Newell Street area to determine the extent and level of the contamination.

138. The Commonwealth of Massachusetts and the United States became aware in 1988 that PCB contaminated fill had been dumped by GE in the early 1940s in the entire Newell Street area stretching from Marchetois property and to the West through the Quality Printing property, and failed to require GE to conduct extensive investigation of the Newell Street area to determine the level and extent of PCB contamination.

Between 1989 and 1999 the Commonwealth of Massachusetts and the United States knew fully well that the Newell Street area, which encompasses the properties of plaintiffs-intervenors, was heavily contaminated with PCBs and presented a serious threat to the lives of plaintiffs-intervenors and their workers, and failed to take any action that would have required GE to remove the PCBs from plaintiffs-intervenors' properties.

140. In October of 1999 the Commonwealth of Massachusetts and the United States announced that they had negotiated a Consent Agreement with GE which states the levels of clean-up which GE is required to achieve for the properties of plaintiffs-intervenors and differ slightly only on whether or not GE wishes voluntarily to pay for an easement for the benefit of the United States and the Commonwealth of Massachusetts:

0 to 1 foot, a spatial average of less than 25 ppm; 1 to 6 feet, less than 200 ppm. For properties where an ERE cannot be obtained, cleanup levels are as follows: 0 to 1 foot, a spatial average of less than 25 ppm; if the spatial average, after incorporating anticipated response actions, will exceed 25 ppm at 0 to 3 feet, then GE shall remove and replace soils to achieve a less than 25 ppm average (Appendix E to Consent Decree, Volume I, Pg. 50).

141. General Electric has removed PCBs from at least 68 contaminated properties in Pittsfield down to the levels of 2 parts per million which is the Massachusetts default standard for PCB contamination. As specified above in the Consent Decree, the United States and the Commonwealth will allow General Electric to clean-up the properties of Plaintiffs Intervenors to a significant lower standard.

142. GE was allowed by the Commonwealth of Massachusetts, the United States and the City of Pittsfield, to leave PCBs in the ground beyond the levels specified by Massachusetts default standards in order for the United States and the Commonwealth to

gain significant concessions from GE in the clean-up of other areas of Pittsfield, and in addition as admitted publicly by counsel for the United States for the payment of **nineteen million dollars** to the United States, and as admitted publicly by counsel for the City of Pittsfield, for contributions equivalent to **many millions of dollars** to the City of Pittsfield through the City of Pittsfield Economic Development Authority.

V. STRACUZZI'S NEWELL STREET SIGN

143. The United States and the Commonwealth admit that the Consent Decree is in fact the taking of an easement on plaintiffs-intervenors' properties, since they have asked General Electric to compensate Plaintiffs Intervenors for the taking of the easement.

144. The values for the easements, referred to in paragraph 143, were set by the Commonwealth and the United States in totally arbitrary and capricious fashion and are an abuse of discretion.

145. The Consent Decree is also arbitrary and capricious and an abuse of discretion in that it makes it totally voluntary upon GE to pay or not pay the totally inadequate easement amounts.

146. Plaintiffs-intervenors cannot dig in their properties.

149. The United States and the Commonwealth have gained concessions from GE estimated to add to more than two hundred million dollars in clean-up costs described in the proposed Consent Decree.

150. The United States and the Commonwealth had however no right to acquire an easement on plaintiffs-intervenors' properties without adequate compensation.

151. The entering of the Consent Decree in its present form is a violation of the Fifth Amendment of the United States Constitution in that it represents a taking of an easement by the United States and the Commonwealth of Massachusetts, of plaintiffs-intervenors' properties without adequate compensation.

LATE BREAKING NEWS

On September 6, 2000, Judge Ponsor ruled in favor of the citizen intervenors, allowing them to present their concerns about the Consent Decree to the Court. They must submit written arguments on October 2, 2000, to which the EPA and the Justice Department have until October 23 to respond. Following those arguments, Judge Ponsor will decide whether or not to sign the Consent Decree.

A YES VOTE: BENNO FRIEDMAN

What we did accomplish:

The outcome of the negotiations is a ten point agreement that, in various ways, enhances and strengthens the Decree's promise to be protective of human and environmental health. In addition, we now have a written commitment from the EPA to investigate the applicability of remedial treatment technologies for the rest of the river. Of equal importance was the side agreement by the lending institutions of Pittsfield to

create a pool of funds for residential property owners who might otherwise be unable to borrow on property that still contained some level of contamination.

What we did not accomplish:

The decision to contain and monitor PCBs rather than remove and permanently destroy them, the plastic sheeting in the river, Mt. Doyle, the mountain of toxic waste 50 yards from the Allendale Schoolyard, the absurdly low figure that General Electric is coughing up to compensate us for damage to the natural resources; the failures of the Decree stand, unaffected by our motion and its withdrawal. Ultimately, the political reality, the unified and nearly universal stamp of approval that had been given the Decree by the agencies, by Pittsfield's political machine, the business community and by the near unbroken silence of Pittsfield's citizenry had its effect on our board of directors. Each one of us will revisit that decision innumerable times, measuring our decision against the continuing cleanup and its aftermath.

What is our current position?

Our objections to the Consent Decree still stand. The language and logic supporting our motion is identical to what we filed as part of the public comments to the Decree. The motion's withdrawal does not signal a change in our approach to the problems associated with PCB contamination. We stand behind our belief that it would be best to remove and render them harmless, rather than contain them under plastic, rock or earth. We are not optimistic about the success of the agencies' solutions.

However, at this juncture, limited to the specifics covered by the Decree, we have conditionally accepted their methodology. The burden of proof rests on them. It is now the agencies' responsibility to live up to the terms of the agreement; to monitor the caps, the armoring and the landfills, the river, the floodplain, and the oxbows and to employ the full extent of their regulatory authority, as defined by performance standards and other yardsticks, to revisit and correct any deficiencies that may arise in the methodology that they have chosen. On numerous occasions, agency representatives have asked for our trust. We give it to them, perhaps naively, certainly hopeful but definitely not blindly.

WOODS POND

A NO VOTE: MICKEY FRIEDMAN

I voted against accepting the settlement because I felt that there were too many aspects to the Consent Decree that compromised public health and the health of the environment. I wanted our day in court. In 1993 HRI published "The Housatonic Manifesto," declaring our commitment to fight for the following: "The Housatonic River and its associated tributaries and wetlands shall be cleansed of all toxins, including PCBs, and there shall be no discharge of waste into the river. Broad reaches of land along the river shall be protected by public ownership." I don't believe that the settlement either adequately removes the contamination or compensates the public.

GE will be leaving massive amounts of PCBs and other toxic contamination in underground plumes in the East Street, Lyman Street, and Newell Street neighborhoods,

beneath the Housatonic River bed and in the river banks, in Silver Lake, and will be adding more toxic material to Hill 78 and the Building 71 landfill. In return for 70 years of river contamination, GE will be paying a natural resource damage award of only \$25 million, of which approximately \$16 million is a cash payment.

In its wake, GE is leaving a city unable to use its own groundwater, a workforce that many believe has been deeply affected by daily contact with toxic chemicals., and God knows how many people with PCB blood levels higher than the national background level. We will never know for sure the price our community has truly paid, and no public health official seems willing to calculate the price we will continue to pay.

Did environmental regulators work hard to craft a settlement they believe in? Absolutely. But they are overworked and underpaid and operate in a world of very limited resources, under enormous political pressure from politicians whose elections depend on corporate campaign contributions, and they face so many other exhausting battles with polluters at other sites.

In this context we are supposed to believe that we have won a big enough victory. The cranes are in the river; significant amounts of PCBs have been removed; and 130 homes have been cleaned. We have played a major part in all this, but for me it is not enough. I have fought for treatment, not landfilling; removal not a plastic-lined cap for the river.

I see Ed Bates and Charlie Fessenden, who worked at Power Transformer and fought valiantly to learn the truth about how the workers were affected by PCBs and tried unsuccessfully to get an open and honest occupational health study; Gig Darey who has fought longer than anyone to truly clean a river he loves and to fight for public ownership of land along the river; Vinnie Curro and Vinnie Stracuzzi, whose Newell Street businesses were poisoned and rendered worthless. They have not received justice.

Compromise has become our national game; and ordinary working people are the ones who always have to make the most compromises. GE faced several billion dollars worth of cleanup costs; they settled for spending several hundred million. We may have achieved more than we dreamed we would have, but that doesn't mean we've won enough. That's the problem with these kind of unbalanced battles.

It's discouraging that former allies have turned their energies to the politically easier and less inflammatory issues of river restoration and seem far more interested in GE's restoration money than PCB removal. From my vantage point, it's premature to talk about restoration until we have a truly clean river from Pittsfield to Long Island Sound. One of the biggest mistakes we made was to give into pressure to separate our Housatonic River Restoration project from our PCB advocacy. It has shifted emphasis from clean-up to beautification, and encouraged egotism and greed. But more than that it works to isolate HRI and makes our continuing advocacy that much more difficult. It is easy to imagine GE refusing to clean the river through Lenox and Woods Pond and into Rising Pond.

When the HRI Board of Directors authorized Tim Gray to proceed with a legal challenge, and engage Cristobal Bonifaz, I believed the Board would follow through. I helped to prepare our legal challenge and believed strongly that we had made a strong and legally sound case. Though EPA and Department of Justice attorneys many times told us that GE would walk and that Judge Ponsor wouldn't consider our arguments, his

September 7, 2000 ruling proves otherwise. I'm disappointed that we didn't have the political will to carry on with that challenge, and personally embarrassed not to be there with the other intervenors.

UPDATES AND PCB NEWS

At the June meeting of the CCC, Susan Svirsky of the EPA spoke about the agency's on-going work for the Rest of the River assessing a wide range of impacts: sediment toxicity, the health of benthic invertebrates, fish reproduction, amphibian reproduction, tree swallow reproduction, as well as some important work studying the impact of PCBs on mink reproduction. The EPA is well aware of recent challenges to the risk assessment work performed on the Hudson River and has made sure to incorporate those concerns in their analysis.

Part of HRI's agreement with EPA called for the Agency to expand and improve public access to important information about the site. One of our main suggestions was to improve the EPA website, and they have done a wonderful job. Find a computer with internet access and log on to <http://www.epa.gov/region01/ge>. Many of the photographs we have used in this issue have come from the EPA site. You can download important documents, for viewing and printing with Adobe Acrobat.

Board Member Shep Evans suggests that people check out the website of the Environmental Defense Fund at <http://environmentaldefense.org>. Using their pollution locator ñ we entered the Pittsfield zip code 01201 - you can find information about the GE-HousatonicRiver Site.

We discovered that the site is tied for 13th place in the nation using the EPA's Hazard Rating System. One wonders what the ranking would be if every PCB dumpsite in the County ñ including those we've been told about at the Super Stop N Shop, the softball complex etc., as well as those yet to be discovered - was included.

ANNISTON, ALABAMA PCB SITE

As part of the Superfund listing, the federal Agency for Toxic Substances and Disease Registry (ATSDR) was to conduct a health assessment of the Pittsfield community.

Recently ATSDR released a draft evaluation of soil, blood and air data from a PCB site in Anniston, Alabama. One of the first manufacturers of PCBs was the Swann Chemical Company – and workers at Swann exhibited some of the first adverse effects from PCBs and journal articles in 1936 and 1937 chronicled severe skin problems and systemic effects like liver damage. Monsanto purchased Swann in 1935 and manufactured PCBs and other chemicals at its Anniston facility. As a result of community pressure, ATSDR began an assessment in 1995. A just released draft reports states:

PCBs in residential soil present a public health hazard of cancerous and non-cancerous health effects for persons with prolonged exposure. **PCBs in residential soils in some areas may present a public health hazard for thyroid and neurodevelopmental effects after exposure durations of less than 1 year.**

PCB exposures may have been more severe in the past. However, **the fact that young children have elevated levels of PCBs indicates that exposure may still be occurring at high levels.**

Persons with elevated blood levels (greater than 20 micrograms per liter) for whom there is evidence of current exposure to soil contamination should be a focus of particular attention in future environmental characterization and public health actions.

Of the 2,970 people who had blood taken, the average PCB level was 14.2 ppb, and levels ranged from non-detect to 2,111.5 ppb.

(Note: according to the ATSDR 95% of Americans have levels less than 10 µg/L (micrograms per liter or 10 ppb (parts per billion.)) But as you can see from Tim Gray's report, there is good reason to believe that this figure will be revised downward to show significantly lower levels.

You can check out the report at http://www.atsdr.cdc.gov/HAC/PHA/annpc/ann_p1.html#bloodpcb.

MONSANTO VERDICT

Extract from The AGRIBUSINESS EXAMINER Issue # 87 August 30, 2000
Monitoring Corporate Agribusiness From a Public Interest Perspective A.V.
Krebs Editor\Publisher

After listening to testimony that the danger to workers posed by PCBs was the reason state officials had to demolish and replace a 12-story state building next to the Capitol after a 1994 fire, a Philadelphia jury stunned the Monsanto Co. recently by ruling that the company should pay \$90 million in damages to the state of Pennsylvania for selling defective and toxic PCBs that left the building contaminated after a 1994 fire.

Board member Don Roeder reports: Our paper entitled "Polychlorinated Biphenyls in Tributary Fishes of the Housatonic River, Massachusetts" has been accepted for publication by the journal Freshwater Ecology and should be appearing soon. Authors are D. Roeder, D. Denefeld and R. Schmidt.

HRI recently received an Environmental Justice grant from the EPA to conduct a survey to give Pittsfield residents an opportunity to recount their experiences with PCBs, express their concerns about PCBs, and comment upon the clean-up efforts underway in local schools, parks, neighborhoods, the Housatonic River and Silver Lake. If you would like to participate, please call Tim Gray at (413) 499-6112.

We've included a copy of the survey questionnaire for those of you living in Pittsfield. Please fill one out if you live on or near PCB-contaminated land, and think you may have come in contact with contamination. Return questionnaires to HRI, 20 Bank Street, Pittsfield, MA 01201.

**FROM EXECUTIVE DIRECTOR
TIM GRAY**

For a number of years HRI has been bringing up information at the public meetings about suspected underground plumes (under-ground pools of chemicals) and buried barrel sites that were reported to our organization by former General Electric Workers.

The usual scenario when we report this information to GE and the Agencies has been a long wait to get action. At many times HRI was told that our evidence did not support the indication that these sites did indeed exist.

HRI kept bringing up the information that a barrel site was located at the Pittsfield landfill. We were told that it had been investigated thoroughly and nothing was found. The agencies told us they did specialized testing to look for the barrels and even brought a person on site to show them where to dig only to find nothing. HRI insistently continued to bring this information in front of the agencies.

The City of Pittsfield was moving at a record pace to cap over the landfill and bring it to final closure under DEP regulations. At the final moments the bulldozer hit a barrel. This prompted DEP to order a full investigation. In the final analysis over 850 barrels were found at this site directly on the banks of the Housatonic. This would have been a time-bomb waiting to further pollute the river.

For almost two years I doggedly brought up more information about the Newell Street area and the well known "fax-yard" reported to HRI by GE workers. Once again we were led to believe that the agencies had sampled these areas and there was no indication that these sites were as problematic as HRI was asserting. That is until EPA finally made GE sink more sampling wells. At the Newell Street parking lot GE finally reported that over 15,000 gallons of a toxic mixture of chemicals had recently been pumped from this site in the weeks after discovery. Some of these plumes have PCB levels as high as 300,000 PPM. They continue to play down the information as a "small pocket" even though GE workers assert this area was a major dumping ground for GE and that barrels and pure chemicals were buried there.

When I asked EPA if under the consent decree settlement they would make GE excavate the barrels and clean up the mess from the bottom up I was told no. EPA will make GE "pump and treat" the chemicals. We worry because these sites are the banks of the Housatonic River and border a residential neighborhood already highly polluted because GE gave away free fill saturated with PCBs and other chemicals.

In the first 1/2 mile clean up GE and EPA have encountered at least three plumes in or on the banks of the river that they were not aware of. One of these plumes is directly next to the "fax yard" that HRI has been asking for years for the agencies to investigate. This plume has extremely high levels of chemicals.

**LYMAN ST PARKING AREA
SITS ABOVE PLUME**

Close to two years ago HRI members also brought to the agencies attention an oily substance they observed directly next to the Lyman Street bridge. HRI was told that

this oil was a naturally occurring substance brought about by the breakdown of organic compounds in the river system. It was nothing to worry about. Over a year went by but HRI members remained skeptical of this assessment. At the last citizen's coordinating council meeting EPA announced that they had found a problem directly in this area connected to the highly contaminated Lyman Street area. It now appears that this oil was not a naturally occurring substance but instead another surprise to the EPA.

HRI does not have a lot of faith in the pump and treat system GE uses. GE has been pumping these chemicals for over 15 years. Recently EPA said GE had pumped millions of gallons out of the ground over this extended period of time. After twenty years it is apparent that we still do not know all of the plume sites and EPA's assertion that all of this information was known seems to be a major miscalculation on their part. Only recently has EPA started talking about the unknowns that will occur in the clean up.

Over two years ago the MA Dept. of Public Health (MDPH) promised a study to help determine the toxic effects of PCBs and answer some of the questions that HRI posed to the Department and address the questions local citizens had regarding GE's claim that PCBs were not problematic.

HRI was particularly concerned about getting the latest, most scientifically up-to-date assessment of what background levels of PCBs in the blood are in the amount most Americans have in their blood who have not been exposed to out of the ordinary concentrations of PCBs. We were particularly concerned with the study the MDPH did of residents living along the Housatonic River corridor. That study, published in September 1997 concluded that "The serum PCB levels found among participants with the highest risk of exposure to PCBs in this study were generally within the background range reported for the non-occupationally exposed population in the U.S."

HRI was concerned that the data they based this decision on was from the 1980's. Upon further research HRI found that the most recent data was supporting a much lower national PCB blood level. If true, this would show people's blood levels in our area were indeed elevated, and of concern.

If you check out the report in this issue on the Anniston Alabama PCB site, you can see the importance of what the federal agencies regard as background levels. In the MDPH study they used the figure of 4 to 8 ppb (parts per billion). What if the background levels are now 2 ppb. That means someone with 8 ppb in their blood has as much as 4 times the amount of PCBs in their blood as the typical American.

HRI had hopes of timely answers to some of our questions. It is now over two years later and the report is still being held up by the MDPH. There is no excuse for the delay. MDPH representatives sent to the Citizen Coordinating meeting have been uninformed, and unable to answer our questions. The people of Berkshire County deserve better than they're getting from MDPH.

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HRI exists on a tiny budget; and we donate hundreds and hundreds of hours of work. Please support our important advocacy by donating whatever you can.

Housatonic River Initiative
20 Bank Row
Pittsfield, MA 01201

Address Correction Requested

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WORKING

**FOR A FISHABLE,
SWIMMABLE
HOUSATONIC
SINCE 1992**