

Rec'd 1/10/13
@Public Inf
Meeting

To CT DEEP

Re: Exide (former Battery Company) proposed SedRAP for Mill River & Southport Harbor. (April 2012)

Dt: January 10, 2013

Fr: Joy Shaw (Jocelyn T.) Shaw, 476 Old Mill Road, Fairfield, CT 06924

JAN 10 2013

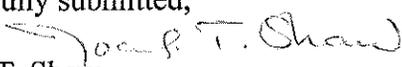
WATER PROTECTION AND LAND REUSE
REMEDIATION DIVISION

Major concerns (Public Hearing, Roger Ludlowe H.S. Jan. 10, 2013)

1. We find unacceptable the decision to allow this proposal to be exempted from the need to obtain an Inland Wetland Permit. How such a ruling can be made in a proposal concerning dredging of the main river of a coastal town has us totally puzzled and deeply concerned.
2. Why has Exide chosen to start from the downstream end of this project when such a project would normally proceed from the upstream end in order to deal with any matter sent downstream as the project proceeded?
(Could it be that Exide anticipates the possibility of angered riverside owners and stop orders that would immediately delay and raise costs of the project?)
3. Permission to continue dredging in the spawning seasons of local species of fish and crabs should be granted only if Exide agrees to use closed system cofferdams in the most seriously contaminated Areas (I, II, and III).
4. Permission for this project should also be granted only if Exide commits to refill each excavated hole with clean fill, so that the river has the capacity to recover. Leaving such deep holes to become anaerobic sumps will prevent the natural biological community of organisms from repopulating the river bottom. The bottom cannot be left unable to support life until such time as Superior Plating may be able to do further excavating to remove chromium.
5. Permission for this project should also be conditional on Exide's taking the necessary steps of photo inspection and removal of any residual lead in and around piping still in place along the railroad tracks on the east side of Area I.
6. As mitigation for the damage it has done and will be unavoidably doing further in this remedial activity, Exide should be required to provide fish ladders for both the tidemill and the Samp Mortar dams

The above listed recommendations represent only the highest priority concerns on the part of this local student of the river, in light of time limitations for this hearing. A full presentation of concerns will follow during the 30-day period allowed for public comment.

Respectfully submitted,


Jocelyn T. Shaw