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MAR 21 1991

Honorable Gerald R. Solomon
House of Representatives
Washington, D.C. 20515

Dear Mr. Solomon:

This is in response to your letter of March 4, 1991 concerning the Reassessment Remedial Investigation and Feasibility Study (Reassessment RI/FS) for the Hudson River PCBs Superfund site, and will confirm our discussion of last Tuesday. In that letter you requested that the U.S. Environmental Protection Agency (EPA) collect new data on the Hudson River environment prior to making its decision.

As we have indicated to you in previous correspondence and at public meetings, and as is documented in the Phase 1 Work Plan that is circulating for review (a copy of which has been provided to your office), EPA has not precluded undertaking new data collection as part of its Reassessment RI/FS. EPA has chosen to conduct the Reassessment RI/FS in a phased approach so that we can better manage the performance of this complex project. In the first phase, EPA is analyzing the existing data to determine, among other things, the extent of data collection that is necessary. The data collection will take place, if necessary, in the second phase.

I would also like to make it clear that there is other data available which is more current than the 1984 river sediment data from the Thompson Island Pool. Hudson River fish tissue samples have been collected semi-annually in recent history, and as such, EPA will utilize the most recent fish tissue data (1988) in its evaluation of human health risk via fish consumption. The U.S. Geological Survey has been conducting water column sampling at several monitoring points on the Upper Hudson on a regular basis, the data from which will also be utilized in the study. In addition, EPA is seeking any available data from other sources, such as General Electric's 1990 sediment sampling effort.

EPA believes that it is advantageous to proceed with the risk assessment at this time, rather than wait for the possible collection of new data. It is typical at sites contaminated with PCBs that affect water bodies, that the human health risk will be

HRP 001 0359

driven by the PCB-concentrations in fish tissues. Therefore, the 1988 fish tissue data should yield accurate results, based on trends which currently show that PCB concentrations in fish have leveled-off. (The 1990 fish tissue samples taken by the State of New York are currently in storage awaiting their release for PCB analyses. It has not been determined when those samples will be analyzed since their release is contingent upon the availability of funds by New York State.)

With respect to the location of future meetings, EPA intends to hold each public meeting at both an up-river and a down-river location since there are interested citizens in both areas. With respect to the groups in the Community Interaction Program, the Liaison Groups are responsible for deciding the locations of their meetings. The Steering Committee meeting, held on March 12, 1991, was in Albany. The Hudson River PCB Oversight Committee meeting to be held on April 4, 1991, will be in Poughkeepsie. These locations may vary throughout the process.

As per your request, EPA has extended an invitation to Tyler Maddry, of your staff, to participate on the Scientific and Technical Committee. We hope that his participation will further contribute to the performance of the study.

If you have any further questions or need additional information, please let me know or have your staff contact Jeane Rosianski of the Office of External Programs at (212) 264-7834.

Sincerely,

/s/

Constantine Sidamon-Eristoff
Regional Administrator

cc: Thomas Jorling, Commissioner
New York State Department of Environmental Conservation

bcc: Alice Greene
Ann Rychlenski-2OEP
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