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RIVER VOICES

SEPTEMBER 1991

Produced jointly by the US Environmental Protection Agency Region 2
and the members of the Hudson River PCB Reassessment RI/FS Liaison Groups.

From The Editor

River Voices is an update produced jointly by the U.S. EPA and the members of the four Liaison Groups established under EPA's Community Interaction Program for the Hudson River PCB Reassessment.

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Contributed articles published in **River Voices** appear as originally written, and any editing has been done for space consideration only, and with the prior consent of the author.

River Voices serves as a vehicle for the exchange of thoughts and information between U.S. EPA and the Liaison Groups, and the public at large. We encourage all those who care about the health of the Hudson River to get involved in the Community Interaction Program.

Liaison Group Activities Update

by: Ann Rychlenski, Community Relations Coordinator, U.S. EPA

In February 1991, EPA held its first meetings under the Community Interaction Program in order to form the four Liaison Groups that would become the foundation of one of the largest community outreach efforts undertaken by EPA at a Superfund site. The four groups (Environmental, Citizen, Governmental and Agricultural) were formed and each one successfully elected a Chair and two Co-Chairs. With elected officers in place the groups proceeded to the matter at hand - getting involved in EPA's Reassessment of the Hudson River PCB Superfund site.

Since those initial meetings, the groups have met on their own and with EPA to discuss the progress of the project as a whole, and to examine, question and comment on the individual facets of this monumental undertaking. The Citizen Liaison Group (chaired by Judy

Schmidt-Dean) immediately took the initiative and conducted a survey in the Upper Hudson designed to assist in understanding who uses the Hudson River and how the PCB problem has affected their use of the River.

EPA reviewed the survey, and learned an important piece of information from it. Out of 40 respondents, approximately half indicate that the "current state of the river, concerning PCB levels" does not adversely effect their use of the river - including fishing. In fact, a number of individuals responded that they continue to fish the upper Hudson despite the fishing ban that has been in effect since 1976, due to PCB levels in fish.

The preliminary risk assessment conducted for the Phase 1 Report supports the ban on fishing instituted by NYSDEC and finds it a cause for concern that despite well-publicized warnings against it, some people are still catching and eating upper Hudson River fish. It must be remembered that many pollutants that adversely effect human health are not visible to the naked eye, and to adopt an "out of sight, out of mind" attitude toward this or any other environmental ban is irresponsible and may be detrimental to your health. Fishing is banned in the upper Hudson from the Troy dam north to Ft. Edward, and a commercial ban is in effect in the lower Hudson for certain species such as the striped bass. The law is there for your protection; don't ignore it.

LIAISON GROUP CHAIRPEOPLE

AGRICULTURAL LIAISON GROUP

Chair: Tom Borden

Co-Chairs: Marilyn Pulver, Phil Griffin

CITIZEN LIAISON GROUP

Chair: Judy Schmidt-Dean

Co-Chairs: Jim Behan, Ennio Ruggi

ENVIRONMENTAL LIAISON GROUP

Chair: Bridget Barclay

Co-Chairs: Kate Larkin Reilly, Carl Deppe

GOVERNMENTAL LIAISON GROUP

Chair: Darryl Decker

Co-Chairs: Keith Griffin, Paul Lilac



LETTERS TO THE EDITOR

1. Agricultural Liaison Group Report From The Chairman

by: Tom Borden

For those of you who don't know me, I'm Tom Borden. I manage a dairy and fruit farm that I co-own with my father, two brothers, and a cousin in the town of Easton in Washington County. I have three children, ages 8 to 20 months. I am also currently Vice-President of Washington County Farm Bureau. My interest in this PCB project is that of a desire to learn more about our regulatory agencies, especially the USEPA and NYDEC, and to encourage an accountability to their actions. Hopefully we can influence a practical and realistic conclusion to this issue.

After attending meetings with other members of our group, I find we all share many of the same impressions of this project. I have had phone calls from a few members asking about the progress of the project and when our next meeting will be. I'm afraid delays in the release of the Phase 1 Report made followup meetings of our group seem unnecessary. This report is expected to be a huge volume and I will only have 3 copies to share (others are available at repositories). Anyone who wishes to study one, should let me know and I will try to accommodate as many as possible. We will have a meeting during the comment period for this report.

Briefly, to report on some of my activities:

Meetings of both the Steering Committee and the Oversight Committee have been held which have basically been organizational and have allowed the input that our group developed at our February meeting in Schuylerville. I submitted written comments at both meetings. I have copies of these comments which I can share with anyone interested.

Chairmen of the Liaison Groups were invited to attend a meeting of the Scientific and Technical Committee in May. This was interesting as members of TAMS Consultants gave some preliminary results of their Phase 1 work. Hopefully a similar meeting will be held for all of our liaison group members so that everyone can have the chance to hear basic results of the Phase 1 work. The biggest point to me was that the half-life of PCBs in the water in the upper Hudson seems to be 3 to 3½ years - in other words, the concentration decreases by HALF EVERY 3 TO 3½ YEARS. Also a study of species of aquatic life in the Hudson appears to be very similar to those present in a similar study done in the 1930s.

On July 9, I attended GE's press conference and briefing at which they gave the results of their studies and

their progress with studying biodegradation of PCBs. Most of you probably received GE's "Riverwatch" newsletter that described their findings. The PCBs have changed and the level in the water is decreasing. They also found the PCBs to have a 3-year half-life. We also visited their test site in the Hudson where they will study factors that may affect the rate of this biodegradation process. Their test platform is impressive - and expensive. It should give some interesting insight into how helpful treating PCBs with special bacteria to enhance biodegradation may be.

Apparently the Phase 1 report has been delayed most recently due to controversy over the Risk Assessment Statement that the EPA will announce as part of this report. Stating "risk" is a tricky business. Scientists recognize that there is "risk" associated with every part of our lives but stating it statistically makes any activity seem more "dangerous" to the general population. Last winter I was handed an article from "Livestock Weekly". It reported on risk analysis done by the US Bureau of Land Management as part of an environmental impact statement. A chemical would be considered a "high risk" if it gave a one-in-a-million chance of cancer in a "typical lifetime" of exposure. Interestingly, a single X-ray gives a seven-in-a-million chance of cancer. To look at it another way, how long does it take to accumulate a one-in-a-million risk of dying in "typical" living from more common causes?

<i>Cause of death</i>	<i>Length of time</i>
vehicle accident	1.5 days
a fall	6 days
drowning	10 days
fire	13 days
firearm accident	1 month
electrocution	2 months
tornado or flood	20 months
lightning	2 years
animal bite/insect sting	4 years

OR quickest yet: SMOKE TWO CIGARETTES!!

Nobody wants to add needless risk to our lives but I think it is important that we keep "risks" in perspective.

2. Three Questions

At the July 16 meeting of the combined Reassessment Liaison Groups, several pertinent questions were raised by members. Three of them in particular seemed to go to the heart of the rationale for the reassessment project. Although the EPA spokesman that evening provided partial information in answer, in my opinion the answers were not completely enlightening. I

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3. Whose Reassessment Is It?

by: Cara Lee

Environmental Director, *Scenic Hudson*

Not long after EPA began to reassess the problem of PCBs in the Hudson River, the General Electric Company began to publish a newsletter. The masthead on their new publication reads "RIVER WATCH; A Report on EPA's Reassessment of the Hudson River." As any reader of "River Voices" knows, GE is the "Potential Responsible Party" - Superfund-ese for the polluter - responsible for the severe PCB pollution that continues to disperse throughout the Hudson River ecosystem. GE's position is that it would be best to leave the PCBs in the upper Hudson River bottom. Their new newsletter attempts to use EPA's reassessment as a foil for their position.

"River Watch" articles misrepresent facts regarding health risks associated with PCBs, conditions in the Hudson River and applicability of GE's research on the existing contamination problem. For example, the lead article in the current issue states that PCB levels in upper Hudson River water have declined significantly. The article fails to mention that despite these declines, PCBs remain the sole contaminant that exceeds FDA levels or other guidelines in the Upper Hudson. The article also fails to mention EPA's acknowledgement that trends showing declines in the water column are inferred from an incomplete series of measurements, based on relatively few samples that may not reflect rapid changes in river flow.

GE goes on to report that EPA found significant declines in PCB levels in upper Hudson fish. The article overlooks that the greatest reduction was due to the initial ban on dumping PCBs and that there has been no statistically significant decline since 1981.

The Hudson River has many distinctions. Unfortunate among them is that it is considered by many to be the worst case of PCB contamination in the country, and the most studied. Despite the plethora of information, GE's selective use of available facts would lead many readers of their newsletter to believe that EPA's research indicates that the problem of PCBs in the Hudson has been exaggerated and is now self-remedying.

GE's use of misinformation raises questions about what purpose their newsletter serves. It is important that the public be given sound information in a comprehensive way so that people can participate in the decision-making process. It is disingenuous, however, for GE to claim that "River Watch" is "keeping the community informed about the PCB situation in the Hudson River."

The newsletter is propaganda that best serves GE's interests, not the public's interests. While GE has the constitutional right to print whatever they want about their work and their opinions, it would be responsible to acknowledge it for what it is, rather than exploiting EPA's credibility with the public. Otherwise, this disinformation campaign seems intentionally designed to subvert EPA's public reassessment process.

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am concerned that EPA share more fully with its Liaison Group members some answers or elaboration on these questions that were brought up on July 16:

1. *Different Types of PCBs.* One question asked was whether EPA was taking into account the varying effects of different types of PCBs. The EPA spokesman said that EPA "as an agency" recognizes PCBs only as a single substance and insists on regulating them as such.

It seems a valid question to ask why EPA has made this choice. There is scientific evidence, as the EPA spokesman agreed that evening, that PCBs with different levels of chlorine have different toxic effects. A recent issue of *Science* (the journal of the American Association for the Advancement of Science; July 26 issue) has an editorial by the former editor of the publication that says "From the standpoint of health effects there is no justification to base regulations of all PCBs on tests with Arochlor 1260." Yet, to the best of my understanding, PCBs with the high level of chlorine contained in Arochlor 1260 have never been found in the Upper Hudson.

EPA's Phase 1 Work Plan mentions (page 2-11) that the Agency is evaluating the future possibility of making distinctions in its risk assessment between the various PCB types. I think Liaison Group members would like to know more about EPA's progress in this program and its relevance to what we will read in the Phase 1 report.

2. *Old vs. New Data.* Some people expressed concern over the fact that EPA will not be including some of the presently available data in the conclusions of its Phase 1 report. The EPA spokesman indicated that

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the agency had to draw the line somewhere--but I think that answer left people wondering how accurate and timely the Phase 1 report is going to be if it fails to give us all the information that's now available.

It would be helpful if EPA would tell us what trends are indicated by the newer studies as those results become available, and tell us also how and when the agency plans to incorporate the newer data into the ongoing reassessment work.

3. **Risk Assessment.** EPA proposes to include a risk assessment in its Phase 1 report--a single number for the entire Upper Hudson. A questioner wanted to know how this would be possible when concentrations of PCBs have been so variable in different segments of the river.

I gather that "risk" equals a "worst-case" estimate of the number of cancer deaths to be expected per unit of population, given a certain concentration of PCBs present. I realize that this whole subject of risk, and the way you put a number on it, is extremely complicated; but I would ask EPA to translate any assessment it makes into terms that we can understand easily, and to be sure we also learn the probable accuracy and the degree of scientific acceptance of the way that number is calculated. As the questioner mentioned, there's the problem of which section of the river the risk figure is going to apply to. As he mentioned also, there is a real possibility of public misinterpretation of the risk figure EPA assigns to the river. This seems very likely; especially if the figure is based on data that are not complete, and based only on the most toxic form of PCB, not on the types that actually exist in the Upper Hudson.

--Eleanor F. Brown
Citizens Liaison Group

(Enclosed with this letter was a reprint of the referenced editorial from *Science* which had to be omitted due to space limitations.)

Editor's Response to "Three Questions"

The editor believes that several points in your letter require clarification within this publication. However, we urge Liaison Group members to use the many avenues of communication open to them to get answers to questions such as these.

1. As has been stated by EPA on many occasions, all PCBs are regulated as if they contained 60 percent chlorine. This is based on historical toxicological work performed by various researchers. On July 1, 1991, a

General Electric-sponsored study which concluded that PCBs can and should be regulated by Arochlor mixture was submitted to EPA. EPA is reviewing this report to determine its acceptability. The Phase 1 Report reflects the current, scientifically acceptable values for PCB toxicity.

2. EPA has included all available data in its Phase 1 Report. To the extent that new pertinent valid data becomes available during subsequent phases of the study (for example, the results of the 1990 sampling of fish in the Hudson River, which results are expected to be available in December 1991), EPA will consider such new data.

3. The Phase 1 Report explains the assumptions used for the preliminary risk assessment. The risk assessment does not yield a single value for risk, nor does it convey a "worst case" scenario. It calculates the number of increased cancer incidents expected, given certain exposure scenarios. The methods and numbers used are scientifically acceptable and employed at Superfund sites nationally. The assumptions are consistent with current regulations and policies which require the use of reasonable maximum exposure scenarios.



Get Involved!

TO JOIN A LIAISON GROUP

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