

- MEMORANDUM -

DATE:

Date

TO:

Potential Peer Reviewer

FROM:

Tom DeCoff

RE:

Peer Review of Hudson River PCBs Reassessment Reports

Eastern Research Group, Inc. (ERG), under contract to the U.S. Environmental Protection Agency (EPA), is in the process of identifying experts with the appropriate qualifications to peer review documents on the Hudson River PCB Reassessment. After reviewing the qualifications of potential reviewers, ERG will propose 10 to 14 experts to participate in the review. The following is additional background information and an availability form and a conflict of interest screen to fill out and return to ERG.

BACKGROUND

During a 30-year period ending in 1977, approximately 1.1 million pounds of polychlorinated biphenyls (PCBs) were discharged into the Hudson River from two General Electric (GE) capacitor manufacturing plants located in Fort Edward and Hudson Falls, New York. PCBs are classified by the EPA as probable human carcinogens.

A 197-mile stretch of the Hudson River from Hudson Falls to the Battery in New York City was classified as a Superfund site in 1983. EPA made an interim no action decision in 1984. In 1990, EPA began the reassessment of the PCB-contaminated sediments in the upper Hudson River. Due to the size, complexity, and high level of public interest in this project, EPA decided to conduct the study in three phases, issuing reports to the public as the work progressed. Phase 2, the largest in scope, was further broken down into six segments. EPA's eventual remedial decision for this site will depend on the information contained in all three phases of the project and in all associated reports, and how that information fits together as a whole.

Individuals will be selected to review one of the six Phase 2 Reassessment Reports, either the Ecological Risk Assessment (ERA) or the Human Health Risk Assessment (HHRA). The other four Phase 2 reports have been peer reviewed. The ERA, released in August 1999, presents the findings of the ecological field sampling program. Correlations between PCBs in the sediments, water column, benthic organisms, and fish are analyzed through food chain modeling and empirical bioaccumulation models. The ERA also contains findings on fish tissue concentrations and how those concentrations impact other species that consume fish. The Executive Summary for the ERA can be read at http://www.epa.gov/region02/superfnd/hudson/era-exsum.htm. The ERA documents can be downloaded in PDF format from

http://www.epa.gov/region02/superfnd/hudson/reports&sched.htm.

The HHRA, also released in August 1999, presents findings on human health risks associated with the Hudson River PCB site and includes recent information on concentrations of PCBs in fish tissue and the most recent toxicity values adopted by EPA, and how they relate to the site. The Executive Summary for the HHRA can be read at

http://www.epa.gov/region02/superfnd/hudson/hhra-exsum.htm and the HHRA documents can be downloaded from http://www.epa.gov/region02/superfnd/hudson/reports&sched.htm.

REVIEWER RESPONSIBILITIES

Each reviewer will be allotted 100 hours to:

- Participate in one conference call, if requested, with ERG and EPA to discuss the peer review, the deliverables, and the agendas for the meetings.
- Review and evaluate either the ERA or HHRA. Prepare and provide detailed written comments on the report that respond to the charge, specific questions, and instructions for the reviewers, in typed hard copy and on a diskette (in WordPerfect format) by June 2000.
- Denote and, if practical, provide a copy of any relevant research that is not included in the report.
- If significant problems are observed in the use of appropriate EPA methodologies, provide specific comments, in writing, describing the problems and making appropriate suggestions. Reviewer suggestions should be specific, clear and without any ambiguity, and must conform to existing EPA methodologies and guidelines.
- Attend and actively participate in two meetings. The first is a 2-day briefing meeting and site visit to be held near the city of Albany, New York, on March 22 and 23. The second is the peer review meeting which will be held over 2 days (May 30 and 31 or June 1 and 2, 2000), in or around Albany, New York.

Please understand that this inquiry does not imply a commitment on ERG's part to use your services for this review, rather this inquiry provides us with information on your interest, availability, and qualifications to perform the review. Conversely, ERG understands that your response to our availability inquiry does not imply a commitment on your part at this time to perform the review. We hope to make our final selection of participants by February or March 2000.

Should you have any questions, please do not hesitate to contact Tom DeCoff at 781-674-7377 (phone), tdecoff@erg.com (e-mail), or 781-674-2851 (fax). I look forward to your response.

Thank you.

Peer Review of Hudson River PCBs Reassessment RI/FS Phase 2 Reports

Ecological Risk Assessment Report Human Health Risk Assessment Report

AVAILABILITY FORM

Please fill out both pages of the availability form and the attached conflict of interest screen, and fax them to 781-674-2851, Attention: Tom DeCoff.

Please fill out the following information for our records:						
Na	me:					
Tit!	le:					
Org	ganization:			And an area		
Ado	dress: (No P.C). Boxes):	· · · · · · · · · · · · · · · · · · ·			
Cit	y:		State:	Postal/Zip Co	ode:	
Cou	untry:					
Phone:		Fax:	· · · · · · · · · · · · · · · · · · ·			
Em	ail:					
Qu	estions:					
1.	Are you into	erested in participat	ting in the project?	Yes No May	be	
	If yes, pleas	se send us your curr	ent resume/CV. You m	nay fax, email, or mail	us a copy.	
2.	Are you available for approximately 100 hours of work from March to June 2000?					
	Yes	No				
		e the days you will the Albany, New Y	<i>NOT</i> be available dur ork, area:	ring March/April/May	June to attend two	
	farch 2000	April 2000	May 2000	June 2000	July 2000	
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	28 29 30 31		29 30 31 32 33	26 27 28 29 30	31	

	L = Low degree of expertise by each of the categories listed	below:	
	I. <u>Ecological Risk Assessment</u>		
	 a) Familiarity with PCBs b) Characterization of Exposure c) Ecological Effects of PCBs d) Receptor Characterization (Fish Eating Species) e) Risk Characterization f) Uncertainty Analysis 		
	II. Human Health Risk Assessment		
	a) Familiarity with PCBs b) Human Health Risk Assessment c) Human Exposure Assessment d) Risk Characterization e) Monte Carlo/Probabilistic Analysis		
4.	Do you have any potential conflicts of interest (COI) in perfor	ming th	is task?
	Yes No		
	Please fill out and sign the attached COI screening form.		
5.	If you are selected, would a fee be required?	Yes	No
	If yes, is the EPA authorized rate of \$xx/hour acceptable?	Yes	No
	If not, what is your lowest government rate?		
	Consultants will be requested to review either the ERA or the information, prepare a written summary of their comments, at the reports, for a total of 100 hours of work.		
6.	Other comments:		

Please indicate your level of expertise by placing an H = High degree; M = Medium degree; or

3.

If you have any questions, feel free to contact Tom DeCoff at 781-674-7377 (phone), tdecoff@erg.com (e-mail), or 781-674-2851 (fax). Thank you.

Peer Review of Hudson River PCBs Reassessment RI/FS Phase 2 Reports Ecological Risk Assessment Report Human Health Risk Assessment Report

CONFLICT OF INTEREST SCREEN

Full	Name:						
Fina	ancial/Professional Affiliation(s):						
	Note: An "independent peer reviewer" is an expert who was not associated with the generation of the specific work products (i.e., the Ecological Risk Assessment, Human Health Risk Assessment, or any other reports generated as part of the Hudson River PCBs Reassessment) either directly or by substantial contribution to their development or indirectly by consultation during the development of the specific product.						
1.	Are you currently employed by General Electric (GE) or have you or your company or organization received any funding, grants, contracts, or cooperative agreements from GE?						
2.	Are you currently employed by the U.S. Environmental Protection Agency (EPA) or have you or your company or organization received any funding, grants, contracts, or cooperative agreements from EPA? Have you been associated with the generation of the specific work products directly or by substantial contribution to their development? Have you been associated with the generation of the specific work products indirectly by significant consultation during the development of these specific products?						
3.							
4.							
5.	Have you been associated with a party which is directly involved in the Hudson River PCBs Reassessment site, including the New York State Department of Environmental Conservation, the U.S. Army Corps of Engineers, and TAMS Consultants?						
6.	Are there any other personal or professional circumstances that might pose a potential conflict of interest for your participation in reviewing this report?						
7.	Do you read, converse, and write in English fluently?						
	I certify that the above responses are true and understand that I am under an ongoing obligation to notify Eastern Research Group of any real or perceived conflict of interest throughout the peer review process.						
	Signature Date						