



STATE OF NEW YORK
DEPARTMENT OF LAW
120 BROADWAY
NEW YORK, NY 10271

ROBERT ABRAMS
Attorney General

JAMES A. SEVINSKY
Assistant Attorney General in Charge
Environmental Protection Bureau

(212) 341-2482

September 18, 1991

Douglas Tomchuk
USEPA
26 Federal Plaza
New York, NY 10278

Re: Hudson River PCB Reassessment - Phase I RI Report

Dear Doug:

I have received and reviewed the Phase I report on the Hudson River reevaluation. My only comment at this time is on the Risk Assessment aspect of the Report.

The executive summary points out that PCBs in fish in the Hudson River represent unacceptable cancer and non-cancer risks. The summary further notes that a fishing ban is in effect, giving the impression that the fish contamination has no real impact on the public and the risk posed by the contamination can be ignored. However, the text of the Report states that fishing bans and recommendations against consumption of fish are regularly ignored. The baseline Risk Assessment is designed to estimate the risk posed by conditions as they exist. As such, it must be assumed that contaminated fish are consumed. While a ban on fishing may be an institutional option to be considered as part of an interim remedial response, such a ban does not represent an effective barrier to consumption. I believe that the assumption of consumption which was utilized in the Risk Assessment performed for the purposed of Phase I was proper and recommend that such an assumption be carried through the entire RI/FS procedure as far as baseline risk is concerned.

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I look forward to discussing this further at the next meeting of the Scientific and Technical Committee. If you have any questions feel free to give me a call.

Very truly yours,

John Davis
JOHN DAVIS
Environmental Scientist

cc: Dr. Richard Bopp, NYSDEC
Dr. Daniel Abromowitz, GE
Gordon Johnson, NYSDEC

lethudson.11r

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