

New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233 7010



Thomas C. Jorling
Commissioner

NOV - 8 1991

Ms. Kathleen C. Callahan
Director
Emergency & Remedial Response Division
U.S. Environmental
Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Dear Ms. Callahan:

RE: Hudson River PCB Reassessment RI/FS
Site No.: 5-46-031

This letter concerns the Hudson River PCB Reassessment RI/FS project. We are generally pleased with the thorough presentation of the existing data in the "Phase 1 Report - Review Copy, Interim Characterization and Evaluation, Hudson River PCB Reassessment RI/FS." However, we believe that a more rigorous analysis of the data needs to be made. Further, the conclusions and their relationship to the proposed Phase 2 Sampling Program needs to be explained. We understand that it is the United States Environmental Protection Agency's (USEPA) intention to discuss the purpose of the additional sampling in its Phase 2 Work Plan, which is intended for release soon. Issuance of this work plan is an excellent opportunity to clearly state the need for the additional data. This is especially true given the public comments on the report that focused on delays with the project. We believe it is very important to explain what the new data will add to our understanding of the existing problem. To assist you in this matter, we recommend that you provide us an opportunity to review the language in the work plan so that it will meet this objective.

In addition, we are still concerned with the proposed sediment transport modeling work on the project. To address this concern, we are requesting a meeting at the project management level to discuss the proposed modeling work. The purpose of the meeting would be to discuss data needs, the current focus and limitations of the proposed modeling efforts.

We look forward to continuing to assist USEPA on this important project. We remain pleased with USEPA's objective approach despite the various outside pressures being applied, and trust that our comments assist in providing meaningful input throughout the Reassessment Project.

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Ms. Kathleen C. Callahan

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Mr. William T. Ports will be contacting Mr. Douglas Tomchuk to arrange a meeting to discuss these issues.

Sincerely,



Michael J. O'Toole, Jr., P.E.
Director
Division of Hazardous Waste Remediation

cc: W. McCabe
C. Peterson
D. Tomchuk

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