



October 24, 1991



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Mr. Douglas Tomchuk  
Ms. Ann Rychlenski  
Region II  
U.S. E.P.A.  
26 Federal Plaza  
New York, NY 10278

Re: Hudson River Reassessment Process

Dear Doug and Ann:

Thank you very much for meeting with us recently to discuss the Hudson River Reassessment Process.

Of the many issues we raised and discussed there are two that I would like to follow up on. The first is the need that we perceive for establishing an advisory committee to reflect lower Hudson River environmental interests. Over the almost twenty year history of this problem, the most intensive involvement has been from those who have directly felt the impact of PCB contamination -- fishermen, port interests environmentalists and citizens from the Hudson Valley. To date, those interests have not participated in the Reassessment process because of the way public participation has been structured to accommodate interests in the vicinity of remediation in the Washington County.

As I expressed to you there are several reasons to establish a separate committee that reflects downriver interests. Those reasons include.

- 1) Geographic distribution: Meetings must be held in locations which make participation convenient. We recommend a New York City location. This is the only way it will be possible to solicit input from downriver interests.

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- 2) Different interests: The interests of citizens/environmentalists from the Washington County area bear virtually no relationship to the concerns of citizens/environmentalists advocating on behalf of the resources in the "lower" Hudson. It will be neither efficient or effective to merge these diametrically different agendas. EPA will learn more from these separate constituencies if each is given a separate forum.
- 3) Established agenda of existing committee: The existing committees have already developed their own dynamics. Rather than trying to enter an existing committee late, we think it would be more productive to simply start up a new committee or a sub-committee. We are well aware of the prejudice against down-river interests that pervades the existing committee. We have no desire to pit ourselves against those sentiments.

We urge you to move forward to establish a forum for down-river interests to provide information and critique of the Reassessment. As you know, we have offered to provide names of individuals and groups who would be likely to participate in this process.

Secondly, as you know, we have serious concerns with the Phase I Report, particularly with the Executive Summary and Synopses. As we expressed at the public hearing, these are extremely important parts of the document and must accurately reflect the scope of the problem. As drafted, these sections give a skewed view of the problem of PCBs in the Hudson that we think is misleading and inappropriate. As I suggested at our meeting, we think that these sections of the Report should be redrafted to better reflect existing conditions. We will be submitting detailed comments on these sections in the next few days.

Finally, we are interested in pursuing a TAG grant for a consultant to assist us in our further review of the Phase I report as well as subsequent

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documents and would like you to provide the appropriate forms to make this request formally.

We look forward to your response on those three issues.

Sincerely,

*Cara*

Cara Lee  
Environmental Director

/gm

cc: Dennis Susckowski  
Sarah Clark  
Constantine Sidamon-Eristoff