

93 Leavy Hollow Lane  
Hudson Falls, NY 12839  
December 15, 1999

Mr. Douglas Tomchuk  
USEPA-Region 2  
290 Broadway-19th Floor  
New York, NY 10007-1866

Dear Doug:

Merrilyn and I are forwarding to you our questions that we would like submitted to the Peer Reviewers of the Baseline Modeling Report.

Since Merrilyn and I are both on the Fort Edward Town Board, we are also forwarding to you the Town Board Meeting schedule for 2000. Because Fort Edward will be the community most dramatically impacted by the decision that will be rendered at the end of this process, we feel that it is imperative that we attend all meetings regarding the reassessment. We hope that by supplying you with this information, meeting conflicts will be avoided.

Meeting dates:  
January 10, 2000  
February 14, 2000  
March 13, 2000  
April 10, 2000  
May 8, 2000  
June 12, 2000  
July 10, 2000  
August 14, 2000  
September 11, 2000  
October 10, 2000  
November 13, 2000  
December 11, 2000

Yours truly,

*Sharon Ruggi*  
*Merrilyn Pulver*

Sharon Ruggi, Councilwoman & Deputy Supervisor  
Merrilyn Pulver, Supervisor

### Questions for Baseline Modeling Report Peer Review

1. A majority of PCB hotspots are buried in the TIP. EPA concludes that PCBs are moving from the buried sediments into the water column. Therefore, PCB levels in the TIP water and surface sediments should remain higher longer than further downstream. How, then, did EPA's model conclude that fish in the TIP would recover faster (in 2011) than elsewhere (2015 in Stillwater)?
2. The BMR concludes that PCBs regularly leave the sediments and enter the water column. Does this conclusion adequately describe what happens to PCBs in Hudson River sediments, the rate of natural recovery and the mechanisms by which natural recovery occurs?
3. After the Allen Mill event in the early 1990s, PCB levels in water and fish rose dramatically. After GE controlled that event, PCB levels decreased. Doesn't it make sense, then, that recent seeps, and not buried deposits, control PCB levels in water and fish. Why did EPA conclude the direct opposite—that PCB sources from Fort Edward do not control PCB levels in surface sediments?
4. GE has demonstrated that the fingerprint of PCBs in fish look like recent seeps of PCBs from the Hudson Falls plant site, not "weathered" PCBs in buried sediment. Did EPA correctly evaluate the fingerprint of PCBs found in fish?
5. If PCBs have been leaving the fine sediments at a significant rate, then why are the "hot spots" still there 25 years after the major releases ended?
6. The report concludes that scour during low flow river conditions is an important source of PCBs in the water. What evidence does EPA have that scour is occurring under these conditions?
7. EPA has acknowledged that, although it concluded in its Low Resolution Coring Report that 40% of PCBs in the TIP had washed downstream, that number can be anywhere from 5-60%. Was the 40% conclusion used in the BMR and, if so, what must be modified as a result?
8. Have the EPA models been adequately calibrated with site-specific data? Have they been validated against known historical data?