

May 4, 2001

MEMORANDUM FOR THE RECORD

FROM: Dona deLeon
Deputy Associate Administrator for Policy, Economics and Innovation

RE: Dredging PCBs from the Hudson

On Tuesday, May 1 Eileen McGinnis, Chief of staff and Dona deLeon met with Marilyn Pulver, Supervisor, Town of Fort Edward and her colleague about their opposition to EPA's proposed action to dredge the Hudson.

The women believe that the dredging will have significant economic impact on their community especially in the areas of boating and other recreational uses of the river, property values along the river which are estimated to be about \$150,000 per house, and agriculture. They estimated that about 17 miles of shoreline will be destroyed and that dredging will occur for 17 hours per day for about 6 ½ months per year. They further believe that no matter what EPA does, litigation will occur and the uncertainty over whether the dredging will actually occur will continue to plague the community as it has for many years already.

They suggested that instead of G.E. spending money to dredge the river that they should educate the public about PCBs and use it to fund beneficial environmental projects for the local communities.

They thought that EPA Region II should have assessed economic impacts on the upper river communities and commented that the NRD process in the state was beginning.

They were critical of EPA Region II for commenting that there was no information that could come forward during the public comment period that would make EPA change its mind.

CEASE POINTS

1. Washington County CEASE, Inc. was organized in 1981 by some local residents. It is a not for profit citizens environmental organization headquartered in Ft. Edward, New York. It is a completely volunteer organization and has no paid staff.
2. CEASE's single purpose is to make sure that the need to protect the quality of human life and the environment in the upper Hudson River area does not get lost in a narrowly focused effort to remove PCB containing mud from the bottom of the River using heavy construction methods.
3. CEASE's primary concerns with the present EPA proposal are:
 - Two 30 acre hazardous waste storage and treatment sites needed - no locations identified; no environmental impacts analyzed.
 - Huge local transportation infrastructure (waterbased, highway and rail) is required - no locations identified; no environmental impacts analyzed.
 - One or more surface mines required for backfill gravel, sand and topsoil - no locations identified; no environmental impacts analyzed.
 - A large number of fossil fueled pieces of heavy equipment required for long periods of time - no quantification of energy use or ambient air quality effects.
 - Hundreds of acres of river bed and banks, including wetlands, over a 40 mile stretch to be removed - no valid water quality or environmental impact analyses provided.
 - Introduction of a sprawling, new heavy construction and industrial project in a rural, tourist-based economy - no socio-economic analysis performed.
3. Procedurally, CEASE notes that the Feasibility Study — despite its apparent large size — didn't contain specific information about the environmental, human health and socio-economic impacts of the proposed remedial action. That makes it impossible for the (a) affected communities to make meaningful comments and participate in the process and (b) EPA decisionmakers to determine whether human health and the environment are improved or impaired by the proposed remedial action. That is why this case is not ready for decision and why the specifics of the proposed remedial action need to be developed and evaluated with real community participation and disclosure to the public, followed by an opportunity for comment.