FINAL REPORT

THE EXPOSURE OF THE NEW YORK CITY WATERSHED TO PCBs EMITTED FROM THE HUDSON RIVER

October 1999

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CENTER FOR THE BIOLOGY OF NATURAL SYSTEMS Queens College, CUNY Flushing, NY 11367

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THE EXPOSURE OF THE NEW YORK CITY WATERSHED TO PCBs EMITTED FROM THE HUDSON RIVER

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SUMMARY

This project has evaluated the exposure of the New York City watershed to a hitherto unexamined source of toxic contamination: the deposition on the watershed of airborne polychlorinated biphenyls (PCBs) that are emitted from the Hudson River. Because of the 0.2 to 1.3 million pounds of PCBs (an EPA estimate) discarded into the river from nearby General Electric plants between 1957 and 1975, the river still exceeds the Federal water quality standard; fishing has been banned, and public hearings have been held to assess G.E.'s liability for the ecological damage to this major natural resource. However, the assessment has not yet considered the ecological impact on the New York City watershed of the PCBs that the river emits into the air – which in 1997 amounted to about two-thirds of the PCBs dissolved in the river.

This project is an initial effort in this direction. For this purpose, an air transport model was used to track the PCBs emitted from successive 10-mile sectors of the river to each of the reservoirs and basins that comprise the overall watershed system. The results generated by the model and by analyses of airborne PCBs sampled at a river site (Coeymans) and at a site in the Neversink watershed (Frost Valley) show that the watershed is systematically exposed to airborne PCBs emitted from the Hudson River. The model-based studies predict that the amount of airborne PCBs transported to the watershed from the river and deposited in the total volume of the 13 watershed reservoirs may result in a concentration of up to 1,050 picograms of PCB per liter of water, considerably exceeding the relevant EPA Ambient Water Quality criterion of 45 picograms per liter. If confirmed by direct reservoir measurements, this PCB level would require the same remedial action already proposed for the Hudson River: dredging the intense PCB deposits in upstream sediment that continue to contaminate not only the river but – as we now know – via the air, the watershed as well.

The results also show that the airborne PCBs that have been deposited on the watershed, chiefly the more highly chlorinated (and generally more toxic) congeners, tend to accumulate there – for example, in vegetation, soil and reservoir sediments. In warm summer temperatures the accumulated PCBs vaporize; re-emitted into the air, they give rise to the unusually high airborne PCB concentration that we have measured at Frost Valley in the Neversink watershed: 1740 picograms per cubic meter. This reflects the long-term accumulation and revolatilization process that has been underway since the Hudson River was first heavily contaminated with PCBs in 1957.

The exposures of the different watershed reservoirs and basins to the airborne PCBs emitted from the Hudson River vary considerably. The Croton/Kensico watershed lies east of the river. It is exposed to particularly large amounts of airborne PCBs from the Hudson River because, compared to the Delaware/Catskill watershed, which is west of the river, it is relatively close to it and generally subject to eastward, more intense, winds (at least during our study period). The reservoirs in this watershed,

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which account for only 21% of the volume of the total system, receive 80% of the total deposition of airborne PCBs transported from the Hudson River to both watersheds. As a result, PCB concentrations in the reservoirs of the Croton/Kensico system may be several times greater than the concentration in the Delaware/Catskill reservoirs.

The sequential events that have contaminated the watershed with airborne PCBs emitted from the Hudson River are consistent with the known facts about the physical processes that govern the environmental fate of PCB: the effect of ambient temperature on the volatility and deposition of the different PCB congeners; increased dispersion and therefore decreased deposition, with distance between the river (the source) and the watershed sites (the receptors); the impact of wind speed and direction on deposition intensity at the receptors.

In sum, these results redefine the ecological domain affected by the PCBs originally discarded into the upper Hudson River. In the river they have led to the formation of a "sink" of heavily contaminated sediment in the pool above the Thompson Island dam, which continues to release unacceptable levels of PCBs into the downstream sections. It now appears that this ecological hazard extends beyond the river itself, for the air transport model predicts that the airborne PCBs emitted from the reservoirs. And just as the accumulated PCBs have caused the river to serve as a source of airborne PCBs, so too, the accumulated PCBs in the watershed, for example at Frost Valley, have been re-emitted, accounting for most of the airborne concentration at that site. Ironically, it is likely that some of this airborne PCB, carried eastward by the prevailing winds, is redeposited in the river, thereby counteracting to a degree the PCB volatilization that has helped to reduce the PCB level in the river water.

Finally, we note that the existence of this enlarged PCB-contaminated ecological domain is thus far based on an air transport model – an inherently indirect method of assessing PCB deposition and accumulation. Accordingly, this assessment should be confirmed by direct measurements of PCB accumulation in the watershed. This can be done, for example, by measuring the PCB content of reservoir sediments and tree bark (which is known to accumulate PCBs); in both cases dating techniques can be used to delineate the history of PCB accumulation (in sediments, by serial analysis of layers; in tree bark, by comparative analysis of bark from trees of different ages).

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I. INTRODUCTION

This project was designed to assess the degree to which the New York City watershed - the source of the city's water supply - is exposed to airborne polychlorinated biphenyls (PCBs) originating in the Hudson River and the potential environmental impact of this exposure. This is a particularly timely issue. As provided by the Federal Superfund Program, New York State is now participating in a Natural Resource Damage assessment to determine the total effect of Hudson River PCB contamination on the state's natural resources. This is an important prelude to assessing the resulting liability on the part of the firms - General Electric in particular that have released large amounts of PCBs into the river. However, thus far the damage assessment has considered only the effects resulting from direct contact with contaminated river water and/or sediment. Although there is no such direct contact between the watershed and the river contaminants, it has been established that the discarded industrial PCBs have become concentrated in the Hudson River sediments, that they dissolve in the river water - and are then emitted into the air. Once in the air, PCBs could readily travel the relatively short distances that separate the Hudson River from the New York City watersheds (see Figure 1) and become deposited there. This project is an initial effort to evaluate this potentially serious environmental process.

II. BACKGROUND

PCBs are similar to a group of other chlorinated environmental pollutants such as dioxin and DDT in their persistence and toxicity. But in other ways PCBs are unusual: They were first produced and used commercially in 1929, long before most other such synthetic chlorinated compounds entered the environment; although their production was banned in 1977, more than half of the one billion pounds of PCB produced until then have been released into the environment.

In recent years, a good deal has been learned about the environmental behavior of PCBs from studies of their tendency to concentrate in the Arctic, despite the very limited PCB sources that occur in that region. It is now known that PCBs are carried in the air from sources as distant as the United States to the Arctic; there, because of the low ambient temperature, they tend to deposit and accumulate in the food chains that support people and wildlife. In the Canadian Arctic, PCBs have been associated with low birth weight and immune deficiencies in Inuit infants and with developmental abnormalities in polar bears. Relatively low temperatures also occur at high altitudes, and a recent study shows that PCBs tend to preferentially deposit from the air and accumulate in the Canadian Rockies, just as they do in northern latitudes. (1)

The environmental behavior of PCBs reflects the physical and chemical properties of this family of over 200 separate molecules (congeners). These properties

Figure 1. HUDSON RIVER AND NEW YORK CITY WATERSHED



are largely governed by each congener's molecular structure, in particular the number and location of its chlorine atoms. As a result, PCB congeners vary considerably in their properties and hence in their environmental behavior. For that reason, in this study we have evaluated the air transport characteristics of the individual congeners that comprise the molecular family of PCBs.

The degree to which a PCB congener exists as a vapor and therefore tends to remain airborne, or attaches to airborne particles (e.g. dust) and therefore tends to deposit is a particularly important property. This property varies considerably with temperature; the <u>critical temperature</u> (Tc) – the temperature at which half of the congener molecules are in the form of vapor and half attached to particles – is a useful means of characterizing this effect. (2)

In the environment - for example, dissolved in the Hudson River or airborne above it – PCBs exist as a mixture of congeners. Such a mixture can be identified by its "profile" - the relative amounts of each of the congeners, ordered according to their "BZ number." This number has been assigned by international convention to each congener and generally increases with the molecule's structural complexity and the number of chlorine atoms. The critical temperature rises with the number of chlorines, so that for a typical trichlorinated PCB (BZ19) Tc is -41°C; for a tetra-chlorinated congener (BZ52), -24°C; for a hepta-chlorinated congener (BZ180), +13°C. Thus, in the temperate climate characteristic of the New York watershed, it is chiefly the more highly chlorinated PCB congeners (BZ above 77), which, when airborne, will tend to attach to particles, deposit and accumulate. The greater the degree of chlorination and critical temperature, the greater the tendency to deposit - and the less the tendency to revolatilize from the accumulated deposit and become airborne. In the New York region, the mono-, di-, tri- and tetra-chlorinated congeners will largely exist as vapor until, by moving northward, they reach Arctic temperatures of -40°C or less and are deposited.

In temperate regions PCB congener behavior will also depend on seasonal and even daily changes in temperature. For example, especially in the warm summer months the moderate to highly chlorinated PCBs in contaminated areas will volatilize to a degree and become airborne. Carried northward – or to higher altitudes – and thus to cooler regions, the PCBs are deposited; then in the next summer they can revolatilize and again move to cooler areas, generally northward. The least chlorinated PCBs revolatilize throughout the seasons due to their low critical temperatures (Tc is -50°C for mono-chlorinated PCBs). These PCBs therefore move rapidly to the coolest regions. This process, which is now known as the "grasshopper effect," has been underway since PCBs were first produced in 1929, contaminating not only cooler regions in the United States and the Arctic, but – as they are deposited en route – to some degree every square meter of soil and vegetation.

These phenomena, and the complex ways in which they interact, govern the movement of PCB from any given source to any given receptor. As a result, the same place may serve as a source and emit PCBs into the air when it is warm and act as a receptor onto which airborne PCBs are deposited when it is cold.

The PCB contamination of the Hudson River has been intensively studied in recent years. EPA-sponsored studies show that most of the PCBs dumped into the upper Hudson River are now attached to the sediments in the pool behind the Thompson Dam, about 10 miles south of Hudson Falls. Over time, this deposit has released dissolved PCBs into the water, which, flowing over the dam, has carried them downstream into New York Harbor. Detailed reports prepared for EPA describe the concentrations of PCBs in sediment and water at a series of sectors along the length of the river. (3) The mixture of these congeners originally dumped into the river at the General Electric plants at Hudson Falls and Fort Edwards is distinctive in its profile. At present, the PCBs found in the river sediment are characterized by a profile which resembles that of the original mixture, but with a higher proportion of mono-, di-, tri- and tetra-chlorinated congeners – the result of partial anaerobic bacterial dechlorination of the more highly chlorinated congeners in the sediments.

In this study we have used two basic methods, which are described in the Appendix, to investigate the movement of airborne PCBs from the river to the watershed. (a) An air transport model was used to estimate the amounts of PCBs deposited on the system's reservoirs and their respective watershed basins from the airborne PCBs emitted by the Hudson River. (b) Daily samples of air were collected for chemical analysis at a site on the bank of the Hudson River and at a site in the Delaware/Catskill watershed over a four-week period in August/September 1998. The concentration of each of the congeners detected in each of these samples was determined and expressed as the amount present per cubic meter of air. This yielded the congener profile and concentration of the airborne PCBs at both sites. The studies based on these two procedures and their results are described below.

III. RESULTS

A. <u>PCB Transport from a Site on the Hudson River (at Coeymans) to a Site in</u> <u>the Neversink Watershed Basin (at Frost Valley)</u>:

In order to directly characterize the airborne PCBs at the Hudson River and in a typical watershed site, samples were taken daily from August 24,1998 to September 21, 1998, at a riverside site at the town of Coeymans just below Albany and from August 26 to September 22 at Frost Valley in the Neversink watershed. As described in the Appendix, at each site air was drawn through an adsorbent cartridge during each successive 24-hour period; the PCBs were later extracted and the concentrations of

each of the congeners detected expressed as picograms (trillionths of a gram) per cubic meter of air (pg/m³). As shown in Figure 2A, at the Coeymans site, the daily congener profiles exhibit a general similarity; they are characterized by appreciable concentrations of certain congeners in the range of BZ1-70 and by lower levels at the higher BZ numbers. In contrast, the Frost Valley congener profiles (see Figure 2B) exhibit relatively higher concentrations of congeners in the range beyond BZ77. These differences in the congener profiles from the two sites can be seen more clearly in Figure 3, in which the average congener concentrations of the daily profiles are compared. The average daily total PCB concentration was 1760 picograms per cubic meter at Coeymans and 1740 picograms per cubic meter at Frost Valley.

The profile at Coeymans reflects the composition of the PCBs originally dumped into the river, modified by the subsequent bacterial action that removed chlorine atoms from some of the highly chlorinated congeners, enhancing the levels of mono-, di-, triand tetra-chlorinated congeners. This accounts for the relatively high congener concentrations at BZ17-19 (trichlorinated) and BZ42-52 (tetra-chlorinated). Congeners above BZ77, which are present in relatively low concentrations, include the penta-, hexa- and hepta-chlorinated PCBs. In what follows, we consider the origin of the airborne PCBs at Coeymans from the river water, their transport in the air to the Frost Valley monitoring site, and their subsequent fate at that site.

1. The emission of PCBs from Hudson River water into the air: -

In assessing the transport of PCBs emitted from the Hudson River to the watershed, it is necessary to determine both the profile of the emitted congeners (i.e., their <u>relative</u> airborne concentrations) and their overall rate of emission from the river, since these data are needed to model the amounts of airborne PCB congeners that are deposited on the various watershed sites.

According to a recent EPA report (4), airborne PCB congeners collected at the Hudson River represent the PCBs that volatilize from the river water. We assume that this generalization applies as well to the airborne PCBs that we have sampled daily in August/September 1998 at the Coeymans river site. Accordingly, the average congener profile of these samples (see Figure 3) is regarded as representative of the profile of the PCBs emitted from the river as a whole.

A model-based analysis recently reported by Farley (5) characterizes the complex pathways that govern the movement of PCBs within the Hudson River. Figure 4, which is reproduced from Farley's report, describes the movement of PCBs in 1997 in the section of the river extending from Troy to the New York City line. It shows that 65% of the total PCBs in the water column was emitted into the air through volatilization. Farley's analysis of the volatilization process leads to the generalization that the rate of emission of PCBs into the air, in grams per day, is given by the amount





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FIGURE 4: THE DISTRIBUTION OF PCB IN THE HUDSON RIVER



Source: Reproduced from Farley (1999)

(in grams) of PCBs dissolved in the upper 0.5 cubic meter layer of the water column. However, in his analysis of PCBs dissolved in the water, the various congeners were not considered individually but as homolog groups consisting of all the congeners with the same number of chlorine atoms per molecule. In addition, several homolog groups were omitted from the analysis. For our purpose it was necessary to relate the total PCB emission rate to a congener-by-congener profile of the emitted material. Accordingly, Farley's emission data were modified by adding the missing homologs (mono, hepta, octa and nona) and disaggregating the homolog groups into their constituent congeners, using the congener proportionality shown in the Coeymans profile as a guide. These procedures produced, for each 10-mile section of the Hudson River analyzed by Farley, an estimated rate of emission for the complete congener profile observed in the airborne PCBs measured at Coeymans.

2. <u>The transport of airborne PCBs from the Hudson River to the</u> <u>Neversink basin at Frost Valley</u>:

As indicated earlier, the HYSPLIT model can be used to trace PCBs from any source, in this case the PCBs emitted from the river at Coeymans, to any receptor site, in this case, a monitoring station at Frost Valley in the Neversink basin. The efficiency of air transport is expressed as the Air Transport Coefficient (ATC) – that is, the fraction of a unit amount of PCBs emitted at the source that reaches the receptor as either airborne or deposited congeners.

The concentration of airborne congeners is affected by diffusion and dispersion, which sharply reduces concentration with increasing source-receptor distance, by advection (wind-impelled movement), and by destructive reactions, predominately with airborne hydroxyl radicals. The efficiency of deposition is strongly affected by the congener's physical state – particularly, whether it is in the vapor phase or bound to airborne particulates – which in turn is affected by the ambient temperature.

Deposition is considerably enhanced when the congener is bound to particles. Congeners differ sharply in this respect. The temperature coefficient (Tc) of different PCB congeners – that is, the temperature at which 50% of the congener is in the vapor phase and 50% particle-bound – varies from +30°C to -50°C. (2) Air transport efficiency is also affected by weather conditions. Wind direction determines whether PCBs emitted from the source are directed toward or away from the receptor; rain and snowfall may considerably enhance the deposition of particle-bound congeners. Finally, deposition is considerably influenced by ground conditions at the site; soil, vegetation and surface water vary considerably in their affinity for PCB vapor and particle-bound PCB.

Two sets of model runs were carried out to estimate and compare the air transport coefficients for representative PCB congeners from the same site over two

different time periods – five weeks and one year. One set of runs evaluated the ATCs for transport of eight congeners from the Coeymans site to the Frost Valley site during the period August 20 to September 25, 1998. A second set of runs evaluated the ATCs for 12 congeners, emitted from the river at the Coeymans site to Frost Valley over the one-year period, March 1998-February 1999.

The two sets of runs are governed by different conditions. In comparison with the August/September model run, the one-year run involves a wider range of weather conditions, especially with respect to rainfall and snow (the August/September 1998 test period was relatively dry) – conditions that enhance deposition. In comparison with emissions from a relatively close 10-mile sector of the river. emission from the entire river involves a longer average source-receptor distance; the ATC decreases exponentially with distance. Finally, the wider range of ambient temperature and precipitation over the one-year model run will accentuate the variable responses of the different congeners to these factors.

Despite these inherent differences in the governing conditions of the two model runs, they yielded comparable results. As shown by Figure 5A, in both cases the efficiency of air transport that culminates in congener deposition increases with the congener's critical temperature (Tc) and hence with its BZ number. In contrast, the ATC values for airborne congener concentration (see Figure 5B) is much less affected by Tc and is characterized by a maximum at congener BZ52-70. This indicates that congeners above this critical range, i.e. BZ99-180, are preferentially deposited in sufficiently high proportions to reduce the overall concentration of the airborne congeners by the time they reach Frost Valley, thereby reducing the net efficiency of air transport.

Thus, we may visualize the transport of the PCBs emitted at the Hudson River to Frost Valley in the following way. As a unit volume of air – let us say, one cubic meter – containing the mixture of PCBs characterized by the measured airborne profile at Coeymans moves through the air to Frost Valley several major changes occur. En route, the higher group of congeners (BZ99-180) tend to bind to airborne particles and therefore to deposit, so that the airborne concentration of the overall congener profile is reduced to a degree by the time Frost Valley is reached; the lower congeners are less affected by this process. When the airborne congeners reach the Frost Valley site itself, the higher congeners are preferentially deposited and contaminate the soil and vegetation at the site. At Frost Valley the lower congeners have a greater tendency to remain airborne in the vapor state and, depending on weather conditions, a greater proportion may therefore leave the site.

These model-based observations suggest that, in comparison with the measured profile of airborne PCB concentrations at the Hudson River (at Coeymans), the corresponding profile measured at Frost Valley – to the extent that it includes



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congeners transported from the river – should be somewhat depleted in its higher congeners because of their tendency to deposit en route and at the site itself. However, a comparison of the profiles based on concurrent measurements of PCB concentrations at the two sites (see Fig. 3) indicates, instead, that the concentrations of the higher congeners at Frost Valley are significantly <u>greater</u> than their concentration at Coeymans. This distinction between the higher and lower groups of congeners is delineated in Figure 6, which describes the difference between the two measured profiles as the ratio of congener concentrations: Frost Valley/Coeymans. The ratio is variable, but generally below 1.0 in the low congener group (BZ1-70), rising to a positive value (about 3.0) between BZ52 and BZ70, which is maintained as BZ number rises. This is additional, independent, evidence of the critical significance of the BZ52-70 congeners as the demarcation between the lower and higher congener groups that was suggested by the air transport coefficient data.

Additional evidence regarding the significance of this critical distinctions between the lower and higher congener groups is presented in Figure 7. This shows that there is no systematic relationship between the relative concentrations of individual congeners in the lower BZ groups measured at Coeymans and Frost Valley; the regression coefficient, R², is only 0.0031. In contrast, the relative concentrations of the higher group of congeners above BZ70 are highly correlated: R² is 0.85, signifying that 85% of the relative congener-to-congener variation within this group in the Frost Valley sample is accounted for by the comparable variation in the Coeymans sample. This close resemblance between the congener profiles above BZ70 is consistent with the transport of these higher PCB congeners from the Hudson River to Frost Valley. But the lack of correlation between the lower groups of congeners in the profiles suggests that the overall relation between the two profiles is more complex.

In sum, while there is evidence that the airborne PCBs that originate in the Hudson River water are transported through the air to the Neversink watershed basin at Frost Valley, some other process must have enhanced the airborne concentration of the higher congeners at that site. This process is considered in what follows.

3. The fate of Hudson River PCBs in the watershed:

PCBs transported in the air from the Hudson River to a watershed site such as Frost Valley arrive in the form of vapor or bound to particles. Those less-chlorinated congeners that exist as vapor at the Frost Valley ambient temperature during the August/September test period are therefore more likely to remain airborne and – subject to weather conditions – to leave the area. The less-chlorinated congeners that do adsorb to vegetation and soil in the vapor state will soon revolatilize and be carried away from the site.

The more chlorinated (higher BZ number) congeners that arrive in the particulate

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FIGURE 7: COMPARISON OF MEASURED AIRBORNE PCB CONGENER PROFILES AT HUDSON

form or become bound to particles on reaching the relatively low temperature at Frost Valley tend to deposit and become incorporated into the soil and vegetation. The higher group of congeners that tend to deposit are chemically stable and will accumulate at the site over time, beginning in the 1950s when the river was first heavily contaminated with PCBs. In sum, we can expect that in general, over time, the higher group of congeners (generally above BZ70) has accumulated at Frost Valley.

In considering the further fate of these congeners, it is useful to examine in more detail how the ambient temperature affects their physical state. As noted earlier, the ambient temperature has important effects on the environmental behavior of PCBs. Temperature governs the tendency of airborne congeners to bind to particles and hence to become deposited; binding decreases with rising temperature. Temperature also affects the volatilization of PCBs; volatilization, as indicated by vapor pressure, increases with rising temperature.

From the available data on the physical properties of PCBs, it is possible to describe the relationship between the percent of a congener that is associated with particles and the ambient temperature. This is shown in Figure 8 for each of 10 representative congeners. It is apparent that especially in the range of temperatures characteristic of the Hudson River and the Neversink watershed basin in the August/September 1998 study period, there is a sharp distinction between the behavior of the lower (BZ1-70) and higher (BZ99 and above) groups of congeners. For example, in the range that includes the ambient temperatures at Coeymans and Frost Valley, 20°-30°C (68°-86°F), the percent of the lower congeners in the particulate phase is close to zero. In contrast, at that same temperature range the percent of the higher congeners bound to particles at 20°C ranges from 3% (BZ99) to 35% (BZ180).

There is a corresponding difference in the response of the two groups of congeners to the shift in temperature between their origin at Coeymans (averaging 29°C during the test period) and their arrival at Frost Valley (averaging 26°C at the same time). The lower congeners are almost completely in the vapor phase at both sites, while the percent of the higher congeners in the particulate phase increases from an average of 17% to 23% on reaching the relatively low temperature at Frost Valley. In sum, en route from the Hudson River to Frost Valley and at that site itself, virtually only the higher group of congeners (BZ99 and above) will be bound to particles and hence likely to be deposited to the surface at a greater rate than the lower congener group.

As noted above, it has been found that in the warm summer months, PCBs in heavily contaminated areas tend to volatilize and become airborne. (6) This suggests that the airborne PCB profile measured at Frost Valley in August/September 1998 includes a mixture of airborne PCBs currently transported from the river together with congeners that were currently re-emitted from the historic deposit at that site.

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Compared with the PCBs currently emitted from the river – that is, the measured airborne congener profile at Coeymans – the measured congener profile at Frost Valley exhibits a considerable increase in the concentrations of the higher congeners. This suggests that, at least in the heat of a summer month, the congeners re-emitted from the historic deposit should dominate the airborne PCB profile at Frost Valley, while the congeners currently transported from the river play a lesser role.

This inference can be evaluated by means of the air transport model. For this purpose we have used the model to estimate the concentrations of airborne congeners transported to the Frost Valley site from the PCBs emitted by the Hudson River as a whole during the August/September study period. This yields a <u>model-based</u> congener profile of the airborne PCBs that were transported to Frost Valley from the river, averaged over the same period in which the measured profile was obtained at that site.

These two profiles are shown in Figure 9, which indicates that the model-based concentration of airborne PCBs at the Frost Valley site is considerably smaller than the measured concentration. The total PCB concentration predicted by the model is 256 picograms per cubic meter, while the measured concentration is 1,740 picograms per cubic meter; thus, <u>current</u> transport from the Hudson River accounts for only 15% of the measured total PCB concentration at Frost Valley.

In sum, it appears that the airborne PCB concentration measured at Frost Valley is largely due to PCB congeners that have followed a complex route: emitted by the river, they were first transported in the air from the Hudson River to Frost Valley; then they were deposited at this watershed site, accumulating over the years since the river was first contaminated; finally – at least in the summer heat of August/September 1998 – they were once again emitted into the air.

Although the total PCB concentration currently transported from the river to Frost Valley represents 15% of the total PCB concentration measured at that site, the corresponding relationship among the separate congeners varies considerably from this average. This is shown in Figure 10, which is a congener-by-congener plot of model-predicted congener concentration, expressed as percent of the measured concentration. In the lower congener group (BZ1-70) this value varies widely from 2% to 78% of the measured concentration. The modeled percentage of the congeners above BZ70 is quite uniformly below 10% of the measured concentration, except for a few outliers in the uppermost range (where there may be inherent inaccuracies due to the low absolute concentrations).

These results indicate that, of the total measured airborne congener concentration at Frost Valley, more than 90% of the high congener group (BZ99 and above) are <u>not</u> currently transported from the Hudson River, but represent PCBs reemitted from the historic deposit. This is in keeping with the earlier evidence that



FIGURE 9: COMPARISON OF MEASURED AND MODEL-PREDICTED AIRBORNE PCB CONGENER CONCENTRATION PROFILES AT FROST VALLEY (Aug./Sep. 1998)

19

11.1286



PCB Congener (BZ Number)

50

72.1287

congeners above this number are preferentially deposited at Frost Valley and hence chiefly responsible for the historic deposit. The behavior of the congener group below BZ70 is also in keeping with the earlier evidence that this group tends to remain airborne en route and at the Frost Valley site itself.

B. <u>The Impact of Airborne Hudson River PCBs on the Watershed Basins and</u> <u>Reservoirs</u>:

The overall New York City watershed system consists of six reservoirs and their associated basins in the Delaware/Catskill system west of the Hudson River and 13 older, more closely grouped, reservoirs in the Croton/Kensico system east of the river. Based on the foregoing results, we can regard the river as a source of airborne PCBs, which, depending on weather conditions, may be deposited on each of the watershed system's components. In order to assess the extent of this process, we have used the air transport model to estimate the degree to which each of the system's reservoirs and watershed basins was exposed to airborne PCBs emitted by the Hudson River during the August 20 to September 25, 1998, test period.

The HYSPLIT/TRANSCO model is designed to track airborne PCB congeners from their emission at geographically localized <u>sources</u>, through the intervening atmosphere, to geographically localized <u>receptors</u> (both specified by latitude and longitude). In what follows, the sources, receptors and the types of data that the model generates regarding each of the source/receptor relationships that link the river to the watershed are characterized. Further details regarding model operations are provided in the Appendix.

1. <u>Components of the air transport model</u>:

a. <u>Sources</u>: These are defined as successive 10-mile sectors of the Hudson River from Glens Falls to the New York Harbor. Each sector is defined by its total area and the latitude and longitude of its centroid point. There are a total of 21 centroid source points; all of the PCBs emitted from a given section are assumed to be emitted at its centroid point. (In some sectors, where the model required greater geographic resolution, several additional source points were included, bringing the total to 35.) For convenience the sectors are grouped according to their position into three river sections: upper (Glens Falls to Troy); middle (Troy to West Point); and lower (West Point to the Harbor).

b. <u>Receptors</u>: In the Delaware/Catskill part of the watershed each of the six reservoirs and their associated basins serve as receptors. The areas of each reservoir and each basin were disaggregated into a group of polygons that best encompasses their natural boundaries. These polygon-based areas serve as receptors in the model operations. They are necessarily slightly smaller than the natural areas of

the reservoirs and basins. However, in computing the total deposition, the computerestimated deposition flux (i.e., the amount deposited per square meter) is multiplied by the receptor's <u>natural</u> area. In the Croton/Kensico part of the watershed, the more numerous reservoirs are not assigned to individual basins. Here the receptors are defined as the 13 reservoirs and the East and West sections of the total basin. Hence, there are a total of 15 receptors in this watershed. (7)

c. <u>Model-generated data</u>: Model runs were carried out to estimate the transport of each of eight representative PCB congeners from each of the 35 source points to each of the 27 receptors. These runs generated data in the form of air transport coefficients – that is, the fraction of a unit amount of emission at the source that is received at the receptor. Then TRANSCO was used to take into account the actual rates of emission of all of the PCB congeners, using an interpolation algorithm based on the results obtained with the eight representative ones. Also incorporated in TRANSCO are algorithms that multiplied each source/receptor air transport coefficient by the appropriate PCB emission rates, congener by congener, at the sources.

The overall results are expressed in the following forms at each receptor:

i) <u>Deposition flux</u>: picograms of PCB congeners deposited per day per square meter of receptor;

ii) <u>Deposition</u>: total picograms of PCB congeners deposited per day on the natural receptor area;

iii) <u>Airborne concentration</u>: picograms of PCB congener per cubic meter of air at the receptor's centroid point, 10 meters above ground level.

For the sake of simplicity, these data, generated for each of the source/receptor couples and each of the emitted congeners, have been aggregated. The sources have been aggregated into the upper, middle and lower sections of the river and their sum; for certain purposes, the separate congeners have been aggregated into total PCBs.

2. <u>Results</u>:

a. <u>Source-receptor relationships</u>:

The amount of airborne PCB emitted by the Hudson River that is received by a receptor is governed by the rate of emissions at the source, the source-receptor distance, weather conditions (especially wind velocity and direction), and the geographic relations among sources, receptors, and the wind direction. The estimated PCB emission rates for successive 10-mile sectors of the river are shown in Figure 11. The rates, in grams of PCB emitted per day, vary from sector to sector depending on

Figure 11. RELATIVE CONTRIBUTION OF AIRBORNE PCBs EMITTED FROM SUCCESSIVE HUDSON RIVER SECTORS TO PCB DEPOSITION FLUX AT NYC WATERSHED RESERVOIRS AND BASINS.

(picograms per day per square meter)



the PCB concentration in the river water and the area of the10-mile sector. Of the total PCB emissions from the river, 1,200 grams per day, 30% is due to the upper section, 42% to the middle section, and 27% to the lower section.

As shown in Figure 11, the relative impact of the three river sections on the deposition flux at the receptors is clearly influenced by the source/receptor orientation and distance. Thus, three of the four northern-most receptors – the Cannonsville and Pepacton basins and the Schoharie reservoir – receive about half or more of their deposited PCB from the upper (northern) section of the river and the rest from the middle section. The fourth northern receptor, the Schoharie basin, receives two-thirds of its deposits from the middle river, reflecting its closeness to that section. The southern-most receptors, the Neversink and Rondout reservoirs and basins, receive more than three-fourths of their PCB deposition from the middle section, to which they are closest. Similarly, the Croton receptors, which are some 40 kilometers to the south, are distinguished by a considerable contribution from the lower section of the river, and relatively little from the upper section. The Kensico reservoir, the southern-most receptor in the system, receives more than half its deposition flux from the lower section. This reflects the reservoir's proximity to the river and the relatively high rates of PCB emission from the two nearest 10-mile river sectors.

b. The role of source-receptor distance:

Several processes that occur during the air transport process result in a sharp, exponential reduction in deposition at the receptor with increasing source-receptor distance. These include dispersion, diffusion, deposition and destruction en route. This effect is illustrated by Figure 12A, which relates the airborne PCB concentration at the 13 Croton/Kensico reservoirs and the six Delaware/Catskill reservoirs (plus the Frost Valley measurement site) to their distance from the closest point of the Hudson River. The PCB concentrations at the reservoirs decline with distance from the river in keeping with a systematic exponential relationship. Similarly, Figure 12B shows the relation between deposition flux and source/receptor distance at each of the reservoirs. In both cases, apart from two outliers, the relatively high regression coefficients (R²) indicate that airborne concentration and deposition flux are systematically governed by the expected influence of the physical factors that diminish these parameters exponentially with increasing source/receptor distance.

The Kensico reservoir is a notable exception to this generalization; as an extreme outlier in the regression curves, it has not been included in the calculation of the regression coefficients for the Croton/Kensico receptors. The unusually low values at Kensico may result from limitations inherent in the HYSPLIT model that tend to introduce inaccuracies in relatively short range transport from area sources. In order to counteract this effect, which was expected to influence the model results for the Croton/Kensico receptors, the density of standard source points was increased in the

FIGURE 12A: THE VARIATION OF PCB AIR CONCENTRATION AT RESERVOIRS WITH THEIR DISTANCE FROM THE NEAREST POINT ON THE HUDSON RIVER; Aug./Sept. 1998



Distance from Reservoir to Nearest Point on Hudson River (km)

11.1292

FIGURE 12B: THE VARIATION OF PCB DEPOSITION FLUX AT RESERVOIRS WITH THEIR DISTANCE FROM THE NEAREST POINT ON THE HUDSON RIVER; Aug./Sept. 1998



26

11.1293

adjacent part of the river. However, this was not done in the region near Kensico, so that it is likely that some air transport trajectories, especially at high wind speeds, were too narrow to effectively encounter the Kensico receptor site, thereby reducing modeled airborne PCB concentration and deposition. A second reservoir, Cross River, which also has anomalously low values and lies at the southern edge of the main group of Croton/Kensico reservoirs, may be affected by this problem.

It should also be noted that the data in both Figures 12A and 12B do not take into account differences in the rate of PCB emission from the successive sectors of the river. This is most marked in the lower section, where emissions rates are significantly more variable than they are in the upper and middle sections. This may also contribute to the anomalously low deposition flux at the Kensico reservoir, which receives 58% of its PCBs from the lower section of the river, and to the Cross River reservoir anomaly as well.

In sum, the detailed differences among the receptors in both parts of the New York City watershed, with respect to the concentration and deposition of airborne PCBs originating in the Hudson River, reflect the expected relations to the weather pattern and their respective source/receptor distances.

c. The role of geographic orientation to wind speed and direction:

There is a sharp difference between the two divisions of the watersheds with respect to their geographic relation to the Hudson River. The river runs north and south, with the Delaware/Catskill watershed to the west and the Croton/Kensico watershed to the east. The significance of this orientation is evident from Figures 13A and 13B, which represent the daily wind direction and velocity during the August/ September 1998 test period in each of the watersheds. (These data are extracted from the NOAA weather model provided with HYSPLIT and therefore governed the outcome of the air transport processes. Wind direction is unadjusted from the model's polar stereographic projection.) The preponderant wind movement is eastward.

The effectiveness of the advection to which the initial PCB emissions are subjected by the wind – that is, the efficiency with which the wind carries the PCBs to the receptor – depends on both the wind speed and wind direction. It will be recalled that the air transport model follows the fate of a unit amount of PCB from a <u>point</u> of emission. During air transport this unit amount rapidly spreads into an ever-increasing volume due to advection, dispersion, vertical mixing and diffusion. As a result, the PCB concentration of the emitted unit amount (e.g., picograms of PCB per cubic meter of air) decreases with time, as does the amount of PCB available for deposition on the receptor. For this reason, if the wind speed is high, so that the source/receptor distance is traversed in a short time, the PCB concentration and the deposition flux at the receptor will be relatively high. As can be seen from Figures 13A and 13B, during

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 $e^{i - \frac{1}{2} \left(\frac{1}{2} - \frac{1}{2} + \frac{1}{2$

the study period the average Eastward wind speed (7.5 kilometers per hour at East Croton) was considerably greater than the average Westward wind speed (2.7 kilometers per hour at East Croton). Accordingly, the travel time between the river and the receptors was much shorter for those in the Croton/Kensico watershed than for those in the Delaware/Catskill watershed. Thus, as shown in Figure 12B, at the <u>same</u> source/receptor distance, the Croton/Kensico receptors receive correspondingly greater airborne PCB concentrations and deposition flux. Moreover, at East Croton, Eastward winds were 3.5 times more frequent than Westward winds, generating a greater average concentration of airborne PCBs.

Thus, receptors east of the river are expected to experience much more intense exposure than receptors to the west of the river from an equal rate of PCB emission at the river during the study period. This expectation is borne out by the results shown in Figures 14A and 14B, which present the model-predicted airborne concentrations and deposition flux at each of the watershed receptors that result from air transport of PCBs emitted from the entire river. Both forms of exposure are far more intense in the Croton/Kensico watershed than they are in the Delaware/Catskill watershed. The diminishing intensity of exposure with the receptors' distance from the river is evident, especially in the latter due to the relatively long distances involved.

It should be noted that these airborne concentrations represent <u>only the PCBs</u> <u>currently transported to the watershed from the Hudson River</u>. As shown earlier for the Frost Valley site, a much larger source of airborne PCBs are the historically deposited congeners that are re-emitted in the high summer temperatures. If this holds also true for the Croton/Kensico watershed, then the <u>actual</u> concentration of airborne PCBs in area may be even higher than the modeled estimates.

d. Total amount of PCBs deposited on the watershed:

From the areas of the receptors and their respective deposition flux, we can estimate the total amount of FCBs deposited on them during each day of the test period. The results are shown in Table I. The total watershed, including deposition on each reservoir and the associated basin, receives a total deposition of 8.26 grams of PCB per day due to emissions from the Hudson River. It is of interest to compare this level of exposure with the total amount of PCBs emitted by the river. As indicated earlier, in the August/September 1998 test period the river emitted a total of 1,200 grams of PCBs per day, of which about 0.7% was deposited on the watershed.

3. Environmental impact:

Because of their environmental effects and hazards to health, the new production and general use of PCBs was banned in the United States in 1977. Based on animal studies and some studies of human health effects, the U.S. National



11.1297

Figure 14B: MODEL-PREDICTED DEPOSITION FLUX OF AIRBORNE PCBs IN THE NYC WATERSHED DUE TO PCBs EMITTED BY THE HUDSON RIVER.

(picograms per day per square meter)



Table I.MODEL-PREDICTED DEPOSITION OF AIRBORNE PCBs ON THE NYCWATERSHED DUE TO PCBs EMITTED BY THE HUDSON RIVER
(Daily, Aug. 20- Sept.24, 1998)

			AVERAGE	AVERAGE					
WATERSHED	VOLUME	AREA	DEPOSITION	DEPOSITION FLUX					
RECEPTORS	(billion liters)	(square kilometers)	(grams/day)	(picograms per day per square meter)					
Catskill/Delaware System									
Cannonsville Basin		1,146.8	0.057	50					
Pepacton Basin	-	942.5	0.076	80					
Schoharie Basin		808.7	0.191	236					
Ashokan Basin		632.9	0.145	229					
Rondout Basin		237.9	0.041	171					
Neversink Basin	-	234.9	0.030	130					
Catskill/Delaware Basins									
Total/Ave.		4,003.7	0.540	135					
Cannonsville Reservoir	366.1	18.7	0.003	177					
Pepacton R.	543.9	21.0	0.008	357					
Schoharie R.	74.2	4.6	0.046	9,935					
Ashokan R.	484.1	32.8	1.003	30,579					
Rondout R.	189.4	8.2	0.083	10,104					
Neversink R.	134.2	6.0	0.018	2,922					
Catskill/Delaware				•					
Reservoirs Total/Ave.	1791.9	91.3	1.160	12,704					
Croton System & Kensico		· · · · · · · · · · · · · · · · · · ·							
Croton Basin East		389.8	0.833	2,137					
Croton Basin West		389.8	1.161	2,978					
Croton Basins Total/Ave.	-	779.6	1.994	2,558					
Boyd Corners Reservoir	6.4	0.9	0.126	139,444					
West Branch R.	38.2	4.1	0.529	129,000					
Mid. Branch R.	15.1	1.6	0.173	108,375					
Croton Falls R.	53.7	4.2	0.418	99,452					
Bog Brook R.	16.7	1.6	0.157	98,250					
East Branch R.	19.8	2.3	0.211	91,565					
Diverting R.	3.4	0.5	0.048	95,020					
America R.	27.3	2.8	0.257	91,607					
Amawaik R.	20.4	2.3	0.301	130,090					
Muscoat P		3.7	0.271	111.000					
New Croton R	90.1	8.1	1 393	171 975					
Kensico B	115.8	8.4	0.336	40.048					
Croton & Kansico	1.0.0		-	101010					
Reservoirs Total/Ave	469 4	43.9	4 595	104 679					
	400.41	+0.01	4.000	104,013					
Total All Reservoirs	2,261	135	5.755	42,569					
Total All Basins		4783	2.534	530					
Total Reservoirs and Basins		4,918	8.289						

Toxicology Program has classified PCBs as "reasonably anticipated to be a human carcinogen." (8) Other health effects that may occur at environmental levels of PCBs include neurotoxicity, behavioral changes, liver damage, and injuries to the thyroid gland. In wildlife, such as fish, fish-eating birds and polar bears, environmental exposure has resulted in reproductive failure and other signs of endocrine disruption.

a. Aquatic impact:

EPA and state agencies have established "Ambient Water Quality Criteria" regarding the ingestion of water and organisms (fish and shellfish) in surface waters, including reservoirs. The present EPA criterion for the ingestion of organisms is a PCB concentration in the <u>water</u> of 4.5×10^{-5} micrograms per liter, which is equivalent to 45 picograms per liter. (4) (Due to bioaccumulation fish living in such water will have a much higher PCB concentration than the water.) This regulation is intended to limit the lifetime cancer risk from eating such fish to one per million – the so-called "acceptable" level, according to EPA. Recently, EPA has proposed to revise this regulation for "ingestion of water and organisms <u>or [emphasis added]</u> ingestion of water" to 1.7×10^{-4} micrograms per liter, or 170 picograms per liter. (4) (The risk from ingesting water alone is much less than the risk of eating fish living in that water.) For its part, the New York State Department of Environmental Conservation has issued an ambient water quality criterion based on the ingestion of fish of 0.001 micrograms per liter, or 1000 picograms per liter. (4)

In addition to these criteria for PCB concentration in aquatic environments, EPA has established a "Maximum Contaminant Level" to govern the allowable PCB concentration in drinking water – i.e., water flowing from a tap. The present regulation, established in 1998, is 0.5 micrograms (50,000 picograms of PCB per liter). However, according to EPA, this level "corresponds to a lifetime cancer risk of 10⁻⁴" (i.e., one in 10,000). (9) If the regulation were computed to correspond to the "acceptable" lifetime cancer risk as defined by EPA itself – one per million – then the allowable PCB level in drinking water would be 0.005 micrograms per liter, or 5000 picograms of PCBs per liter. The New York State drinking water standard is 0.1 micrograms of PCBs per liter, much less stringent than the Federal standard; in comparison, the drinking water standard in New Hampshire is 0.005 micrograms of PCBs per liter. (10)

In sum, the present Federal regulations applicable to the water as it occurs in the New York City reservoirs, based on the EPA-adopted (but not always honored) "acceptable" lifetime cancer risk of one per million, is 45 picograms of PCBs per liter; this risk is almost entirely due to eating fish living in the reservoir. A proposed EPA aquatic criterion that is also applicable to ingestion of the water alone is 170 picograms of PCBs per liter. Regulations directly applicable to drinking water call for a maximum concentration of 50,000 picograms of PCBs per liter. However, <u>if</u>, as would seem proper, this drinking water regulation were based on the EPA one-per-million lifetime

cancer risk standard, the regulated maximum would be 5,000 picograms per liter, a standard adopted by New Hampshire.

As an initial step, the environmental impact of the PCB concentrations in the watershed reservoirs that arise from the deposition in them of airborne PCBs emitted by the Hudson River can be compared to these existing regulatory criteria. A full evaluation of the impact would require studies as extensive as those that have been underway in recent years to evaluate the ecological impact of the PCB levels in the Hudson River itself. There, it has been recognized that the large amounts of PCBs dumped into the river from General Electric plants have created a highly concentrated "sink" of PCBs in the sediment in the Thompson Dam pool which has contaminated the downstream river, leading to unacceptable PCB levels in fish and other organisms. For example, based on our analysis of the PCB concentration in the middle and lower sections of the river (see Section B.2.a. above), the average concentration in August/September 1998 was 5,280 picograms of total PCB per liter, clearly well above the existing ambient water quality criteria.

Corresponding analyses of the environmental impact of the Hudson River airborne PCBs on the New York City watershed would require similar studies of the effect of the historic deposits of airborne PCBs in the reservoirs and their basins. At the present time, when we only have the first evidence that airborne PCBs emitted by the Hudson River have, in fact, been deposited on the watershed over the years since the river was first contaminated, it is nevertheless useful to assess the range of this exposure, as a guide to necessary full-scale studies of environmental impact.

For this purpose, we have used our model-generated data on the deposition of airborne PCBs emitted by the river to predict the resultant PCB concentrations in the watershed reservoirs. This estimate does not take into account the PCBs deposited on the watershed basins, some of which will reach the reservoirs through their tributary streams. Since the reservoir system is, of course, in constant use, the concentration that PCB added to it from the air will reach in the water depends on the steady-state condition in which the amount of PCB entering the system is equal to the amount leaving it in the same period of time. For the purpose of this initial evaluation, we consider the reservoir system as a whole in order to estimate an average steady state concentration that results from the deposition of the airborne PCBs emitted by the Hudson River. At full capacity the total system holds 598 billion gallons, or 2,264 billion liters of water; an average of 1.45 billion gallons (5.49 billion liters) is drained from the system daily to supply the New York City (and some Westchester communities) demand for water. (7) If in this hypothetical situation the airborne PCBs emitted by the Hudson River that are deposited on all of the system reservoirs, 5.76 grams per day, enter the system, then once steady-state equilibrium is reached, the same amount must leave it in that time, carried in 5.49 billion liters of water. The PCB concentration in the

water leaving the system daily, which is also the PCB concentration in the system as a whole, is therefore:

5.76×10^{12} picograms/5.49 x 10⁹ liters = 1,050 picograms per liter

This computed concentration, 1,050 picograms of PCB per liter, greatly exceeds the EPA ambient water quality criterion, and is about equal to the less stringent New York State standard of 1,000 pg/liter.

The volumes of the individual reservoirs and amounts of airborne PCBs deposited on them per day vary considerably. There is an especially striking contrast in this respect between the reservoirs in the Delaware/Catskill and Croton/Kensico systems. Although the Croton/Kensico reservoirs represent only 20% of the volume of the total reservoir system, they receive 79% of the total amount of PCBs deposited on all the reservoirs. Thus, the PCB concentrations in the reservoirs of this, more highly exposed, watershed will be considerably greater than the concentration computed above for the hypothetical case in which total volume of all the reservoirs is treated as a whole.

It should be noted that the foregoing analysis is based on <u>modeled predictions</u> of the total amount of airborne PCBs entering all the watershed reservoirs from the Hudson River and a steady-state concentration derived from the total volume and daily usage of the entire system. In reality, the complex flow pattern that links the component reservoirs will influence their respective steady-state concentrations. Moreover, the predicted PCB concentration is likely to overestimate the overall annual value, for it is based on estimated emissions from the river in August/September, when they may be relatively high. On the other hand, PCB emissions from the river in earlier years, which were much greater than they are currently, may be accumulated in reservoir sediments, adding to the concentrations predicted from current emissions.

In sum, these considerations suggest that the PCB concentrations in the watershed reservoirs, especially in the Croton/Kensico system, that result from the deposition of airborne congeners emitted by the Hudson River are likely to significantly exceed the applicable Federal regulatory criterion of 45 picograms per liter and therefore to justify the necessary remedial action.

b. Direct exposure to airborne PCBs:

Apart from the environmental impact of PCBs deposited on the watershed, people are potentially exposed to airborne PCBs through inhalation. The U.S. EPA has recently made a detailed study of this risk associated with the PCB pollution of the Hudson River north of the Troy dam. (4) We have employed their criteria for assessing the inhalation health risk to people living near the river and inhaling PCB vapor at the concentrations we have determined at Coeymans. The assessment may apply to people living in Troy, Rensselaer, Albany, Castleton, Hudson, and Poughkeepsie, the main centers of population along this stretch of the river, since PCB emissions are generally the same or higher than at Coeymans river section.

The EPA separates PCBs into three "tiers" for cancer risk purposes. The "High Risk and Persistent" category is defined as congeners found in Hudson River fish; these congeners were measured in the air samples taken at Coeymans. They are assigned a "slope factor" of 2 (mg/kg-day)⁻¹ which, when multiplied by the estimated lifetime daily dose, yields the risk of developing cancer per 1,000,000 people, the maximum "acceptable" risk according to EPA. (The cancer slope factor is an upper estimate of the carcinogenicity of PCBs.)

The daily lifetime dose of each congener was determined from the mean airborne PCB concentrations over the 28-day study period, and the average volume breathed by a 70 kg person. This led to an exposure of 50,000 picograms per day for "High Risk and Persistent" congeners, corresponding to a dose of 710 picograms per kilogram of body weight per day, or 0.71×10^{-6} milligrams per kilogram per day. Multiplying the dose by the slope factor yields a lifetime cancer risk of 1.42 per 1,000,000 – about equal to the maximum "acceptable" risk according to EPA. Given that the airborne PCB concentrations in the Croton/Kensico area appear to be greater than the concentration at the river (Coeymans), the risk would be correspondingly greater there.

IV. EVALUATION OF RESULTS

This section considers possible uncertainties that might limit the significance of the foregoing results.

A. Evaluation of the PCB Air Transport Model:

Like all such mathematical models, the HYSPLIT/TRANSCO model of PCB air transport represents an effort to reduce an inherently complex real-world process to a set of mathematical statements that can predict the actual outcome of that process – in this case, the amounts of airborne PCBs transported from the Hudson River to designated sites in the New York City watershed system.

A basic question naturally arises: Instead of depending on a model that indirectly estimates the amounts of PCBs at the various watershed sites, why not measure them directly? Such measurements are, of course, useful ways to estimate the local exposure to PCBs at the site. However, they do not in themselves provide information

about the <u>source(s)</u> of the exposure – which is an essential element of this project. The HYSPLIT/TRANSCO model can provide such information.

However, a second basic question then arises: How can the reliability of the model be tested? The preferred method of dealing with this situation is to compare the predicted values generated by the model with actual measurements. For example, in an earlier study the HYSPLIT/TRANSCO model was used to predict the amount of dioxin emitted from an inventory of <u>all known</u> U.S. and Canadian sources that gave rise to airborne concentration at specified sites (e.g., dairy farms). The predicted values were compared with actual measurements made at the same time at the same site and found to be reasonably accurate estimates of the actual values (11). This result testifies to the reliability of the HYSPLIT model's basic structure, which is the same whether it is adapted to dioxin or PCBs. HYSPLIT has evolved at NOAA from a relatively simple version in 1982 to version 4 in 1998, progressively incorporating the latest analyses of the relevant atmospheric, chemical and physical processes. HYSPLIT has been validated by real-world data, for example, long-range balloon tracer experiments on the Rabaul volcanic eruption and radioactive fallout from the Chernobyl accident. (12)

In the present case this direct approach to model evaluation was not possible because the sources of PCB emissions are far too numerous and widespread to be completely inventoried; they would need to include, for example, wooded areas such as Frost Valley which – at least in the summer – is a source of airborne PCBs. Nevertheless, within the data described in the preceding section are observations that, taken together, set useful limits to errors that may be inherent in the PCB air transport model. These are summarized below.

B. <u>The Reliability of Model-Estimated PCB Deposition and Airborne</u> <u>Concentration</u>:

On its face, the comparison of the measured concentration of airborne PCBs at Frost Valley with the model-estimated concentrations of PCBs transported to that site from the Hudson River might be regarded as a model validation test. But this would be so only if the Hudson River were the <u>only source</u> affecting Frost Valley. As already noted, there are in fact additional sources that influence the airborne PCB concentration at Frost Valley: certain congeners re-emitted from historic deposits of PCBs transported from the river and, to an unknown extent, "background" PCBs. Nevertheless, as shown in Figure 10, apart from two outliers, in the remaining 77 congeners, the modeled concentrations are all below the measured concentration. Accordingly, if the model does not accurately estimate the real values, it may be more likely to <u>under</u>-estimate them.

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C. <u>The Reliability of the Model's Response to Variations in Parameters That</u> <u>Influence PCB Deposition and Concentration</u>:

Figures 12A and 12B show that the model reliably reflects the distancemodulated effects on PCB air transport. As expected from physical considerations, the model-predicted airborne PCB concentration decreases exponentially with source/receptor distance. In addition, Figure 11 shows that, as expected, at each receptor the relative contributions of PCBs from the three river sections reliably reflect the receptor's proximity to them.

Figure 5 describes two sets of model-estimated air transport coefficients (ATC) for deposition of airborne PCBs emitted by the Hudson River (at Coeymans) to the Frost Valley site. The model runs involved different time periods – five weeks in August/September 1998 and a one-year period beginning in February 1998 – and hence were affected by very different weather conditions. Nevertheless, the model-generated results exhibited the expected similarities and differences. Thus, because the congeners' tendency to bind to particles – and hence to deposit – increases with their critical temperature (Tc), as expected the model-estimated increase in deposition flux with increasing BZ number follows a similar course in both tests. The larger increase observed in the one-year test reflects the fact that rainfall is, of course, greater over one year than it is in five weeks, for precipitation greatly enhances particulate deposition. Moreover, both cases show decreases in the airborne concentration ATC of the higher congeners that reflect – as they should – the influence of their preferential deposition.

These examples signify that the air transport model can reliably reflect the expected effect of source-receptor distance and the characteristic properties of the different PCB congeners.

We note that the detailed data on PCB deposition in the individual components of the watershed system are based on modeled air transport only during the five week August/September 1998 period. It is of interest, therefore, to consider how seasonal weather patterns might affect such results over the course of a full year. Seasonal effects due to variations in the PCB concentration in river water (which influences the rate of emission to the air) are unlikely since this concentration during the five-week study period was close to the yearly average for 1998. On the other hand, as noted earlier, we expect that the increased frequency of rain and snow (which facilitate deposition) over the course of a year would increase deposition of the more highly chlorinated congeners. The most significant seasonal differences among receptors are likely to arise out of their east-west orientation towards the Hudson River, due to seasonal patterns of wind direction and speed, factors we found to be important predictors of relative deposition in our five-week runs.

D. The Background Problem:

In a sense, this is perhaps the most distinctive difference between modeling PCBs and otherwise similar toxic pollutants such as dioxin. Because they are so stable and so widely varied in their physical properties, especially in response to ambient temperature, PCBs have become pervasively distributed in the environment. Over the years since they were first manufactured, the sources of PCBs have included, not only the facilities in which they have been produced or used, and disposal sites (intentional or otherwise), but also every square meter of land and surface waters that have received deposits of airborne PCBs. How, then, is it possible to identify the environmental impact of a single source of airborne PCB, such as the Hudson River, even if it is relatively intense compared with the ubiquitous background? In the present project this question applies particularly to the measured PCB concentration at Coeymans, where we have assumed that background makes only a negligible contribution.

The assumption that air concentration measurements taken at the Hudson River represent PCBs emitted from the river is supported by several EPA-sponsored studies. The results suggested that "...the PCBs detected in the air were emanating largely from the Hudson River" and that the river was characterized by an airborne PCB concentration between 1,000 and 2,000 pg/m³. (4) Thus, the airborne PCB measured at Coeymans, 1760 picograms per cubic meter, is in keeping with these independent estimates and can be regarded as largely due to congeners emitted from the river. Farley cites an airborne PCB concentration measured in a non-urban coastal area (Sandy Hook, NJ) in 1998, sufficiently close to the Hudson River estuary to be regarded as a relevant background value. That concentration, 227 picograms per cubic meter, is 13% of the measured concentration at Coeymans.

V. CONCLUSIONS

Recent studies have shown that most of the PCB in the heavily contaminated Hudson River is emitted into the air – as much as 65% in 1997. (5) Our project has evaluated the exposure of the New York City watershed to this hitherto unexamined airborne source of toxic contamination. An air transport model has been used to track the individual PCB congeners emitted from successive 10-mile sectors of the river to each of the reservoirs and basins that comprise the overall watershed system. The results generated by the model and by analyses of airborne PCBs sampled at a river site (Coeymans) and at a site in the Neversink watershed (Frost Valley) support the following conclusions.

1. The New York City watershed is systematically exposed to airborne PCBs emitted from the Hudson River, thereby expanding the ecological domain affected by

this toxic pollutant to an important natural resource beyond the river itself. Our modelbased studies predict that the amount of airborne PCBs transported to the watershed from the river and deposited in the total volume of the 13 watershed reservoirs may result in a concentration of up to 1,050 picograms of PCB per liter of water, considerably exceeding the relevant EPA Ambient Water Quality criterion of 45 picograms per liter. If confirmed by direct reservoir measurements, this PCB level would require the same remedial action already proposed for the Hudson River: dredging the intense PCB deposits in upstream sediment that continue to contaminate not only the river but – as now know – via the air, the watershed as well.

2. The airborne PCBs that have been deposited on the watershed, chiefly the more highly chlorinated (and generally more toxic congeners), tend to accumulate there – in vegetation, soil and reservoir sediments. In warm summer temperatures the accumulated PCB congeners vaporize; re-emitted into the air, they give rise to the unusually high airborne PCB concentration measured at Frost Valley in the Neversink watershed: 1740 picograms per cubic meter. Yet, the model predicts a concentration at Frost Valley of only 256 picograms per cubic meter due to PCBs <u>concurrently</u> transported from the Hudson River. Thus, the high airborne PCB concentration in the watershed reflects a long-term accumulation and revolatilization process that has been underway since the Hudson River was first heavily contaminated with PCBs in the 1950s – earlier at much higher rates than at present according to EPA studies.

3. The sequential events that have contaminated the watershed with airborne PCBs emitted from the Hudson River are consistent with the known facts about the physical processes that govern the environmental fate of PCB: the effect of ambient temperature on the volatility and deposition of the different PCB congeners; increased dispersion, and therefore decreased deposition, with distance between the river (the source) and the watershed sites (the receptors); wind speed and direction.

4. The exposures of the different watershed reservoirs and basins to the airborne PCBs emitted from the Hudson River vary considerably. The Croton/Kensico watershed, which lies east of the river, is exposed to particularly large amounts of airborne PCBs from the Hudson River because, compared to the Delaware/Catskill watershed, which is west of the river, it is relatively close to it and – at least during our study period – subject to eastward, more intense, winds. The reservoirs in this watershed, which account for only 21% of the volume of the total system, receive 80% of the total deposition of airborne PCBs transported from the Hudson River to both watersheds. As a result, PCB concentrations in the reservoirs of the Croton/Kensico system may be several times greater than the concentration in the Delaware/Catskill reservoirs.

5. In sum, these results redefine the ecological domain affected by the PCBs originally discarded into the upper Hudson River. In the river they have led to the

formation of a "sink" of heavily contaminated sediment in the pool above the Thompson Island dam, which continues to release unacceptable levels of PCBs into the downstream sections. It now appears that this ecological hazard extends beyond the river itself, for the air transport model predicts that the airborne PCBs emitted from the river and deposited in the watershed may also reach unacceptable levels in the reservoirs. And just as the accumulated PCBs have caused the river to serve as a <u>source</u> of airborne PCBs, so too, the accumulated PCBs in the watershed, for example at Frost Valley, have been re-emitted, accounting for most of the airborne PCB, carried eastward by the prevailing winds, is redeposited in the river, thereby counteracting to a degree the PCB volatilization that has helped to reduce the PCB level in the river water.

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Finally, we note that the existence of this enlarged PCB-contaminated ecological domain is thus far based on an air transport model – an inherently indirect method of assessing PCB deposition and accumulation. Accordingly, this assessment should be confirmed by direct measurements of PCB accumulation in the watershed. This can be done, for example, by measuring the PCB content of reservoir sediments and tree bark (which has been shown to accumulate airborne PCBs (13)); in both cases dating techniques can be used to delineate the history of PCB accumulation (in sediments, by serial analysis of layers; in tree bark, by comparative analysis of bark from trees of different ages).

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<u>Appendix</u>

A: THE HYSPLIT/TRANSCO MODEL

We have employed the HYSPLIT-4 (Hybrid Single Particle Lagrangian Integrated Trajectory) computer model developed by the National Oceanic and Atmospheric Administration (NOAA) and adapted by Mark Cohen for Persistent Organic Pollutants as the basis for the analysis of transport, dispersion, deposition and destruction of airborne PCBs. (Draxler 1998a, b; Cohen *et al.*, 1995) The HYSPLIT model can incorporate, in considerable detail, actual weather data for the United States and southern Canada. CBNS used NOAA's "EDAS" (Eta Data Assimilation System model) meteorological data for a three-dimensional grid of points 80 km apart horizontally, with 22 atmospheric layers vertically (HYSPLIT-4 reaches up to 12,000 km), tabulated at three-hour intervals. (Rolph 1998) NOAA has archived various data for the years 1991 to present for use with transport modeling. EDAS has been available since 1997, and we chose 1998 for our analysis.

The program computes the transport and dispersion of material emitted at a given geographical location (designated by latitude and longitude), by estimating the atmospheric behavior of one gram "puffs" of pollution (injected into the air at intervals from source locations), based on the detailed weather data. Each puff's movement and behavior is estimated individually. In our primary scenario, 888 such puffs were emitted at each source site, and then tracked, over the 37 day study period. This process is illustrated schematically in Fig. A-1.

In operation, HYSPLIT is capable of estimating the fraction of a given gaseous or particulate material emitted into the air, at a given geographic location that will be deposited to ground level at any specified location in the United States or Canada. We used a version of HYSPLIT-3 adapted to dioxin and atrazine that Mark Cohen developed at NOAA based on work he did on HYSPLIT-4 at CBNS (Cohen et al., 1995). However, to obtain the data required by this project, it was necessary to adapt the original model to PCBs' chemical characteristics; most importantly, for a series of representative PCB congeners, the basic HYSPLIT program was modified to reflect the distribution of the substance between the vapor phase and its attachment to atmospheric particles during transport. The modification included the effects of the physico-chemical properties of the substance (e.g. its vapor pressure), the nature of the atmospheric particulate, and temperature on vapor/particle partitioning. We used Falconer and Bidleman's (1998) temperature-dependent PCB congener parameters to determine vapor particle partitioning in HYSPLIT at the temperature of each puff. As noted in the main report, the different PCB congeners have very different vapor/particle partitioning characteristics. The model was also adapted to PCBs' tendency to partition to water, molecular diffusivity, and tendency to destruction in the atmosphere by

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hydroxyl radicals. We used Dunnivant *et al.*'s (1992) QSARs (Quantitative Structure-Activity Relationships) estimates for Henry's Law constants (PCB congeners' tendency to partition to water) along with experimental data. Molecular diffusivity was estimated by the method of Fuller, Schettler and Giddings recommended by Lyman *et al.* (1990). Hydroxyl radical reactions were estimated by QSAR computer algorithms developed by William Meylan (1999) based on the work of Roger Atkinson and others.

The overall operation of the modified HYSPLIT model is diagramed in Figure A-2. In our configuration, beginning with the emission of an initial 1 g puff of material, the program computes the transport, dispersion, and destruction of the material over a five minute period, at the end of which the puff's new location, size and mass, and the amount of material deposited to the ground, are recorded. At the same time, the program determines the degree to which the area represented by the size of the puff overlaps with the area of the receptor (e.g., reservoir) and the amount of the material deposited into it is thereby computed and recorded. For the model resolution we needed, this cycle is repeated every five minutes over the entire five-week period. Puffs are emitted at one-hour intervals over the five-week period, and all of them are tracked separately by the model. Puffs which have undergone extensive dispersion, deposition and destruction resulting in extremely low concentration of PCBs are dropped from the model.

The modified HYSPLIT program is therefore capable of the following basic operation: For a given PCB congener, characterized with respect to its temperaturedependent vapor/particle partitioning, periodically emitted in the form of "puffs" into the air at any location, the model will compute the airborne concentration, PCB destruction in the air, and the amount of the material deposited at any other location over time. The results of these calculations can be expressed as the percent of the emitted material that is deposited at a given second location over the five-week period; we use the term Air Transfer Coefficient (ATC) to designate this value.

For the purpose of this project, emission locations were selected at three-mile intervals of the Hudson River in segments close to the watershed and ten-mile intervals further away. Each model run computed the fraction of the material emitted at each of these 35 locations for each congener that was deposited over the area of each of the watershed reservoirs and of their respective basins.

Each such run required a significant amount of computational resources, so that it would have been impractical to analyze the transport of all 209 congeners from each of the 35 source sites. In order to carry out the computations needed to estimate source input data, a separate data-processing/interpolation computer program was created: TRANSCO (Transfer Coefficient). As shown in the main report, there was a systematic relationship between each congener's air transfer coefficient and its vapor/particle partitioning. This enabled us to enter factors for each of the PCB congeners into the TRANSCO program, so that it was then capable of estimating separate air transfer coefficients for each of them.

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Appendix A: References

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B. ANALYSIS OF AIRBORNE PCBS: METHODOLOGY

1. Sampling Sites:

Sampling at two sites was carried out for 28 days at each. The first was at Frosty Acres, a YMCA property SW of Slide Mountain in Frost Valley in the Catskill Mountains, at approximately 3400 feet. The other was beside the Hudson River at Coeymans NY (near Ravena) river mile 132. Identical air sampling systems were set up at both sites. At Coeymans, air flow rates and changing times were recorded by SUNY staff; at Frosty Acres members of the local scientific teaching staff carried out the experiment.

2. PCB Analysis:

a. <u>Sampling procedures</u>:

To achieve a sensitivity of 0.01 nanograms (ng = 10^{-9} grams) PCB congener/ cubic meter of air, 30 cubic meters per day were collected on Florisil by using three cartridges (each containing 0.5 grams of Florisil), which were designed and tested specifically for this study. Each batch of three cartridges was accompanied by a field blank comprised of one cartridge. Hence, there were 56 field blank cartridges at the end of the experiment, controlling for field contamination, handling contamination and laboratory contamination during cartridge preparation and extraction.

To achieve 30 cubic meters per day one Gast pump was used (rated at 42 liters per minute (L/min): 21 L/min being the required flow). Flow rates were determined at the beginning and end of each 24 hour period with a calibrated rotameter.

b. PCB analysis:

i. <u>Chemicals, standards, and glassware</u>:

All solvents were purchased by lot and a specimen from the lot was analyzed prior to receipt to ensure purity. The solvent (500mL) was evaporated to 0.5 milliliters (mL), and analyzed by Gas Chromatography with Electron Capture Detection (GC/ECD) using a Hewlett-Packard 5890 chromatograph with robotic injection and a Schimatzu laboratory information system. Florisil was purchased by lot being fully activated in 1 kilogram (kg) jars from US Silica. Deactivation was performed by dropwise addition with continuous shaking of distilled/deionized water to a final concentration of 4%, followed by rolling for at least 4 hours. The Florisil was calibrated by the addition of 1 mL of 20 micrograms per milliliter (µg/mL) of each of Aroclors 1221, 1016, 1254 and 1260 to a 10g column of Florisil contained in a 1 centimeter (cm)

individually analyzed by GC/ECD to determine the volume necessary to elute all congeners. This value was indelibly marked on the bottle and the label was signed by the technician performing the calibration. Anhydrous sodium sulfate (Malinckrodt) was extracted in a soxhlet extractor for 24 hours, placed in a 100 degrees Celsius (°C) vacuum oven for 24 hours, and then stored in a hexane-washed narrow necked bottle with a Teflon-lined cap.

Aroclors 1221, 1016, 1254, and 1260 for use in standards were obtained as neat liquids from Monsanto Chemical Co. in the year 1968 and as solutions in hexane from AccuStandard, Inc. (New Haven, CT). Hexachlorobenzene (HCB), 1,1-dichloro-2,2-bis(p-chlorophenyl)ethylene (DDE), mirex, and 3,4,3',4'-tetrachlorobiphenyl (IUPAC 77) were also obtained as neat materials or standard solutions from AccuStandard, as were five individual mixtures of non-coeluting PCB congeners designated by George Frame (1996). A mixture of 3,4,5,2',6'-pentachlorobiphenyl (IUPAC 125) and 2,3,4,5,6,3',5'-heptachlorobiphenyl (IUPAC 192) in acetone (1 μ g/mL each) for use as a surrogate standard and a solution of 2,4,6,2',6'-pentachlorobiphenyl (IUPAC 104) in hexane (5 μ g/mL) for use as internal standard were custom prepared by AccuStandard, Inc.

Each technician was assigned separate glassware. All reusable glassware (sample tubes, concentrator bottles, flasks, chromatography columns) was soap and water washed, rinsed with acetone and hexane, and dried to minimize residual contamination.

ii. Sample extraction and concentration:

Sample tubes were extracted with hexane (15mL) in threes collecting the 45 mL of hexane in a concentrator bottle after the addition of surrogate standards. The sample extract was transferred to a 600 mL evaporator bottle with 1.5 mL stem (Labconco, Inc.) and reduced in volume (N₂ pressure 2 psi, 65°C, vortex speed 70%, ~20 min) on an N₂ evaporator unit (RapidVap, Labconco, Inc.) to exactly 0.5 mL, transferred to a hexane-washed glass GC vial, and capped following addition of internal standard (IUPAC 104; 1 µL of a 1 ng/µL solution in hexane).

iii. Instrumentation and analysis:

High-resolution, congener-specific analysis of up to 83 individual PCB congeners and 18 congeners as pairs or triplets (total of 101 congeners), in addition to HCB, DDE, and mirex, was performed by parallel dual-column (splitless injection) GC with ECD. The columns employed were a Hewlett-Packard Ultra II 5% phenylmethyloctadecylsilyl bonded (DB-5) fused silica (25 m, 0.33 µm film, 0.25 mm i.d.) capillary column and a fused silica Apiezon L (30 m, 0.25 µm film, 0.25 mm i.d.) column. Instrumentation consisted of a Hewlett-Packard 5890 gas chromatographs equipped with dual ⁶³Ni EC detectors, Hewlett-Packard Model 7673 robotic injectors, Hewlett-Packard Model 3396 Series II integrators, and analog/digital (A/D) conversion boards (Shimadzu Scientific Instruments, Inc.) for automated data transfer to an acquisition computer. The integrators were employed only to control the GC operating parameters and run start; data collection and peak integration were performed using dedicated chromatography software (see below). Helium carrier gas flow was approximately 2 mL/min with a linear flow rate of 30 cm/s. The column temperature was programmed as follows: 100°C hold for 2 minutes (min), 10°C/min to 160°C, 1°C/min to 190°C, and 2°C/min to 270°C, with a 10 min hold until the end of run. Injector and detector temperatures were maintained at 250°C and 300°C, respectively.

The sequence of each analytical batch consisted of a hexane blank, Quality Control (QC) check standard, method blank (blank collection tube), and unknown samples (maximum of five). The QC check standard was prepared by pippeting 0.5 mL of check standard solution (see below) into a vial and adding 1 µl of internal standard solution. Three microliters of each sample were injected into the GC per run.

iv. Calibration:

A 1:1:1:1 mixture of Aroclors 1221, 1016, 1254, and 1260 (20 ng/mL of each in hexane), fortified with HCB, DDE, and Mirex at 1 ng/mL each, in addition to 3,4,3',4'tetrachlorobiphenyl (IUPAC 77) at 2 ng/mL, was employed as a calibration standard. Levels of individual congeners in this mixed Aroclor standard were originally determined by dual column GC/MS/FTIR and were recalculated prior to the start of this study using commercially available primary congener standards (i.e., "Frame" mixes 1-5; AccuStandard, Inc.). The mixed Aroclor standard included essentially all of the PCB congeners originally distributed in the environment plus certain non-Aroclor congeners formed during microbial dehalogenation of more highly chlorinated PCBs. The stock standard solution (200 µg/mL) was diluted in hexane to create a series of working solutions at 20, 40, 50, 100, 200, 300, and 400 ng/mL of each Aroclor. Seven-point calibration curves, bracketing the expected sample concentrations, were generated at biweekly intervals. Response factors for each calibrated peak were automatically updated by the chromatography software. A QC check standard solution, which was an identical mixed Aroclor solution except that it was prepared from Aroclors originally. obtained directly from Monsanto Chemical Corporation, was also utilized.

v. Data collection and processing:

Raw GC/ECD, following A/D conversion, were stored in a Pentium PC. Integration, calibration, editing and reprocessing of individual sample data, and production of final chromatograms and reports were carried out using Class VP Chromatography Data System software (Version 4.2; Shimadzu Scientific Instruments, Inc.). Data for each batch of analyzed samples were initially processed by the software and then reviewed by technical staff for appropriate integration and identification of each peak. Editing and reprocessing of the initial chromatogram was carried out if required to manually correct any deficiencies in the initial integration parameters.

Edited data were exported into an Excel spreadsheet for compilation of individual column data and then into a Lotus 123 spreadsheet via a custom-designed macro program to validate and combine the individual data sets to produce a final report. The macro program included a provision to confirm the presence of peaks for a given congener (or co-eluting pair) on both columns as a condition of reporting a data value. The decision paradigm used by the software was as follows: 1) A peak containing a specific congener must appear on both columns within the expected retention time window; if not, it was assumed that the signal arose from an interfering compound and the data were censored. 2) Individual congeners that were resolved on DB-5 but not on Apiezon L were reported using the results from DB-5. 3) Individual congeners that were resolved on Apiezon L but not on DB-5 were reported using the results from Apiezon L. 4) Individual congeners that were resolved on both columns were reported using results from the column exhibiting the better resolution and reproducibility. 5) Congeners that were not resolved on either column were reported as pairs or triplets. The macro also automatically performed a comparison of calculated levels for selected major congeners/pairs that elute cleanly on both columns (IUPAC 52, 74, 90+101, 99, 118, 177, 187, 194, 199). Between-column variation for these congeners was assessed for QC purposes as a relative difference parameter (mean of congener level calculated for each column divided by arithmetic difference between column values). Finally, the macro software produced a final report containing values for total PCB (sum of individual congener levels), individual congener concentrations, recoveries for both surrogates, and internal standard areas for every sample within the analytical batch.

vi. Quality Assurance and Quality Control (QA/QC) procedures:

The QA/QC program in use in the laboratory was developed in consultation with outside scientists in the field of PCB analysis and according to recommendations in relevant publications. The laboratory maintains a comprehensive and ongoing QA/QC program to ensure the validity of reported data. This program included provisions for internal and surrogate standards, routine QC check standard verification, method blanks, trip blanks, field blanks, duplicates, and interim and final data reviews.

QC limits to internal standard areas for each column were set as two (control limit) and three (warning limit) SDs from the mean of 14 replicate injections of Aroclor standard in hexane. Statistical control was assured by inputting all internal standard data into spreadsheets and plotting control charts of internal standard areas. Samples where the areas exceeded warning limits were rejected. If the QC check standard internal standard area exceeded warning limits, the entire analytical batch was rejected. Recovery data for each surrogate were also input into spreadsheets and monitored by QC charts. As discussed above, the QC check standards were mixed Aroclors prepared from an independent source and calibrated against the AccuStandard mixed Aroclor preparation. For a batch to pass QC, the levels of several major congeners (IUPAC 4+2, 18, 74, 99, 118, 138, 153, and 180) and 80% of the remaining congeners in the QC check standard must have been within $\pm 15\%$ of the expected value for each column. Acceptable samples must have <30% average difference between the

congener levels determined using the DB-5 vs. Apiezon column areas. Data from method blanks were similarly compiled for QC purposes.

Raw sample data underwent several levels of QC review prior to being released in final form. Each technician verified internal standard areas as acceptable for each sample as the initial check, followed by verification of QC check standard acceptability, manual editing of data if necessary, data export to spreadsheets, and final processing via Lotus macro. Hard copies of chromatograms, individual and combined column data reports, QC check standard reports, batch sample reports, and chain of custody forms were included in each sample batch file. Electronic files of original and edited chromatograms and data reports were archived by tape or "zip" drive. The batch files were then reviewed by a QC technician, who confirmed (by checklist) the acceptability of internal and QC check standards in addition to the presence of several expected congeners in human serum samples. The QC technician then signed off on the file and passed it on to the lab manager for final review. The lab manager performed a final overall review for unexpected or unusual results and approved the data for release. This three-step QC review process ensured a high confidence in the quality of reported data and directly involved the technical staff in QA/QC procedures.

c. <u>Data analysis</u>:

Quality control of spurious contamination was achieved using the field blanks. Ten randomly selected blank tubes have been analyzed (representing 10 cubic meters each). Less than 0.01 ng of any PCB congener was detected representing less than 0.001 ng/cubic meter of air, with the exception of sporadic appearance of 5 PCB congeners at approximately 0.2 ng or 0.02 ng/cubic meter of air.

To discriminate global PCB air pollution from Hudson River-derived PCB, scatter plots were employed. These allowed differences to be visualized and also quantitatively assessed using the correlation coefficient R. The method was used successfully at the Akwesasne Mohawk Nation comparing sites and also comparing PCB composition reported in the literature for Bermuda.

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