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MEMO

Review Copy
Phase 1 - Work Plan
Preliminary Reassessment
Hudson River PCB Reassessment RI/FS

18 March 1991

Comments on Review Copy

1-1

For the sake of accuracy, The tidal effect ends at the Ford Dam.

PCB,s were discharged by a number of operations as well as the General Electric. In all fairness this should be addressed.

Some review may be warranted as to the contribution of the PCB,s from the Mohawk drainage basin. They could possibly be large.

An assesment of the toxicity of PCB,s in light of recent and older studies certainly would be prudent.

2-1

2.1 The data collection performed in the last year by DEC and private operations certainly should be included. i.e. HES studies for GE.

2-2

2.1 The influences of newly generated PCB's on the fish database may lend interesting information.

A. It would be an unpardonable breach of good engineering not to include the recent fish information even if some other source of moneys for the analysis has to be found. Present day costs and speed of analysis is not a serious consideration.

2-4

2.2 We need demographic studies of the net influence on humans. Has the rate of cancer increased, decreased or stayed the same since the removal of the dam. A study of the dam was made for Niagara Mohawk the reports should be somewhere. DEC should have the information.

The total bioaccumulation in the food chain may possible exceed the amount discharged. A mass balance of the fish population alone over the 14 years could be revealing. Why do we change the allowable fish content over the years?

2-11

C. The toxicity assessment begs the question: are PCB's a significant threat to human health ? This in light of recent laboratory studies with cultured human tissue cells.

The biodegradation of PCB's being a fact that was established by the Japanese, a realistic look should be made as to how far this has progressed in the river. Their studies addressed the aerobic degradation.

The Rensselaer Polytechnic Institute has an excellent group that understands biodegradation. I would suggest that you contact Dr. Lenore S. Clesceri. The phone number is 518 276 6481.

Some suggested studies.

The Electric Power Research Institute has many interests in the area of study and their Database could be of interest.

Monsanto Chemical Corporation and the General Electric studies should be included in the assessments.

The risk assessment studies of Roger Ames could provide interesting insights to this whole process.

The NSF studies of the Fort Edward Water Supply.
Technical Report NSF Grant No. SPI 78-03499.

Degradation of Polychlorinated Biphenyls by Microorganisms.
National Institute for Environmental Studies Japan
Published in the Journal of the Water Pollution Control
Federation May 1980.

William D. Bradley