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To: Douglas Tomchuk, EPA Region II

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Comments on the Hudson River PCB Reassessment RI/FS Work Plan and Scope of Work

On the whole, the scope of work and work plan are well thought out and appropriate to the issues. Some suggestions I would make to TAMS Consultants are as follows:

1. In the baseline ecological risk assessment, look into the importance of food vs water and sediments as a major route of uptake of PCBs by fish at different trophic levels.
2. As much as is possible, use data on specific congeners in doing risk assessments. It is possible that the major congeners present are of low toxicity or of high toxicity - this will make an enormous difference in the outcomes of the risk assessments.
3. Do not just focus only on the upper Hudson River - remember that the migratory fish, such as striped bass, move into the estuaries far from the source of the PCBs and take the PCBs with them. The ban on commercial fishing for striped bass due to PCBs has had an enormous economic impact on the local fishermen in eastern Long Island.
4. I have read recently that lime may be useful as a remedial technique for PCBs. I assume you will be looking into the possibilities of this alternative.