DIVISION OF ENVIRONMENTAL SCIENCE, WADSWORTH LABORATORIES, NEW YORK STATE DEPARTMENT OF HEALTH, ALBANY NY 12201-0509

PHONE 518-473-7582   FAX 518-474-8590

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Douglas J Tomchuk
Project Manager, Hudson River PCBs Site
USEPA Region II, J K Javits Federal Building
NY NY 10278

Dear Mr Tonchuck,

These are my comments on TAMS Consultants Inc documents of December and January.

General: While Chapter 2 of the January document would provide an excellent protocol for investigating a site about which little is known, it is unnecessarily involved for the present task in which there is a great deal of published information widely available. This makes Task 1 by far the most important task in Phase 1. The Community Relations section is a most welcome. Task by task comments are as follows.

Task 1: This is the most important task and if undertaken vigorously should provide answers for most of the subsequent tasks.

Task 2: Much of this investigation has been completed and the bottom line is that the fish from all points of the Hudson River are inedible. Food chain modelling is not necessary.

Task 3: Determination of transport of PCB needs to be undertaken on a congener by congener basis. There are some adequate models already working (Manhattan College) using "total PCB". Only congener specific data will be able to address the question of microbial PCB transformation or degradation. Not enough emphasis is put in this section of transport in aqueous solution during the majority of the year, as opposed to irregular transport on sediment during scouring events.

Task 4: The use of TCDD toxicity equivalents for estimation of PCB risk determination will require a more advanced form of congener specific analysis for foodstuffs derived from the river. More emphasis will have to be placed on inhalation and dermal contact which are probably important factors in consideration of whether to use the river for recreational purposes by the population which lives around it.

Sincerely yours,

Brian Bush

Brian Bush Ph.D.