70038

AGRICULTURAL LIAISON GROUP
PHASE 1 REPORT
HUDSON RIVER OVERSIGHT COMMITTEE
April 4, 1991

Our group certainly appreciates the role we are to be allowed to take in this PCB reassessment. The proximity of agricultural lands and livestock to the Hudson River Valley and the nature of possible PCB contamination certainly makes this a very important issue to the agricultural community.

Because of the economic importance of agriculture to New York state, contamination of farm lands and livestock should be of great concern to all New Yorkers. The "Community Relations Plan" (pp.10 - 11) gave only a very small indication of New York's agricultural strength. To illustrate this, here are a few statistics from the NY Department of Agriculture. Because agriculture is basically a "raw materials" producer, it also supports an extensive food processing and marketing industry plus an agricultural services industry. THE FOOD AND AGRICULTURE INDUSTRY IS NEW YORK'S NO. 1 INDUSTRY. Receipts from sale of all New York farm products amounted to $2.61 billion in 1988. In addition, New York is our nation's 3rd largest dairy producing state, the number one producer of both creamed and low-fat cottage cheese, second in production of Italian cheeses, and third in ice cream. New York is third in production of apples, second in production of tart cherries, third in grapes, fourth in pears and sixth in strawberries. New York is also second in production of sweet corn for fresh market, third in production of snap beans for processing, and fourth in production of cauliflower for fresh market. AGRICULTURE IN NEW YORK STATE IS IMPORTANT AND WORTH PRESERVING AND PROTECTING.

While we're on the "Communtiy Relations Plan", I noticed the "Reassessment Area of Focus" (pp. 16-17 Figure 2) includes three counties: Rensselaer, Saratoga, and Washington. Back on pages 10 to 11, Washington County was apparently overlooked for mention of level of agriculture. According to NY Agricultural Statistics in 1988, agricultural sales were over $73 million that year with an estimated economic impact of $190 million to the county. Forty-five percent of Washington County land is in farms compared with a state average of less than 30% and the county ranks seventh in milk production among New York counties.

Our committee met on February 28th with 23 members attending (and several others calling me with regrets of not being able to attend). We concentrated our discussion on the Phase I Work Plan we had received.

On committee structure, it was noted that the Agricultural Liaison Group Chairman was the only representative of Agricultural interest on the Oversight Committee. Since the presevation of agriculture is important to New York state economy, we look forward to consideration

of agricultural impact being given high priority in any action taken. Perhaps the scientific and technical committee can be of assistance here.

Also, with the possible stated cost of this total project approaching $850 million (p.6 CRP), and the widespread and complicated environmental implications, we are concerned with the final decision on this project being left up to a single indivdidual.

We then reviewed the project by TASKS as listed:

TASK 1: As with the other liaison groups, we favor evaluating the Hudson River with current data, taking more if necessary, to discover any changes in PCB levels that may have already occurred. The scope of this project would seem to make adhering to a "schedule" unimportant compared to making the "right" decision.

And under "D. Prepare inventories" (p.2-3) , shouldn't agricultural contamination be added as leading to potential human exposure?

TASK 2: Will we know if the bioaccumulation rate has changed over time? Are the PCBs found more recently the same strength as they were years ago?(p. 2-5)

TASK 3: No comment.

TASK 4: It appears that more recent data even questions how toxic or carcinogenic PCBs are to humans. At the Steering Committee meeting, it was stated that previously set EPA levels of acceptable contamination will be used as guidelines for determining necessary action. We believe that this level should be reevaluated by the USEPA concurrently to this study using all existing data so that the final decision takes into account ALL of our best scientific data.

Under "A.", page 2-10, what "other chemicals" will be identified in the monitoring data?

Where do the "background" PCBs come from? Will other possible sources of PCB contamination be taken into account, for instance the Mohawk River basin may be contributing to lower Hudson contamination.

One of the major "exposure pathways" is "inhalation...in vapors and fugitive dust". Will this be taken into account in any removal attempts made of PCB sediments?

On page 2-11, "sources of PCB toxicity information" include "open literature". We would like to see more recent data on toxicity evaluated into this and look forward to seeing a list of the literature used.

TASK 5: We understand that the "comprehensive list of applicable or relevant and appropriate requirements" will be made available.

TASK 6: No comment.

OTHER POINTS: Biodegradation could be a very important factor in resolving this problem. It has been suggested to our group that Dr. Lenore S. Clesceri of RPI might be an excellent source of information on this phenomenon.

A list of some studies which should be pertinent to this reassessment were previously forwarded for your consideration.

Lastly, our group still feels that meetings for this project are better serving the people most directly affected if their location remains no further south than Albany. The entire area of study still remains entirely north of this.

Sincerely,

Thomas A Borden

Thomas A. Borden
Chairman
Agricultural Liaison Group

P.S. As chairman of the Agricultural Liaison Group, I plan on attending the Oversight Committee meeting on April 4, 1991.