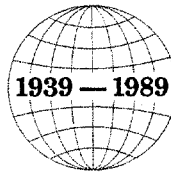


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Manhattan College
Environmental Engineering 50th Anniversary

FIFTY



YEARS

July 17, 1992

Mr. Douglas J. Tomchuk
Environmental Engineer
Emergency/Remedial Response
USEPA
26 Federal Plaza
New York NY 10278

Dear Doug:

As I mentioned to you yesterday, I just received the Phase II report and so do not have the time to review it in detail since I will be away next week. I did want to offer the following major comment which was immediately obvious to me.

There are apparently no plans to sample the aquatic biota for PCB congeners even though there is an extensively planned data collection for the water and sediment. I think this is a mistake. While I do not think the correlation analysis proposed on page 5-16 is the best approach, I do not see how this analysis can be performed without a comparable set of data for water, sediment and fish. Since the entire analysis of the water and sediment is being conducted on a congener specific basis, the statistical analysis would require comparable data for the fish. I would therefore urge that congener specific data be collected for indicator fish at the same time as the water and sediment data.

For inclusion of the sediment pathway to the BAF calculation, the authors may wish to examine the theoretical framework given in our latest paper (Thomann et al, 1992, Environ. Tox. & Chem.) to further support the statistical analysis framework that is proposed.

I appreciate the opportunity to look at the report. Please keep me on the mailing list to receive future items.

Sincerely yours,

Robert V. Thomann
Professor
Environmental Engineering & Science

Education—Research—Service