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ENVIRONMENTAL MANAGEMENT COUNCIL

PETER BALET
CHAIRMAN

GEORGE HODGSON
DIRECTOR

July 21, 1992

Mr. Douglas Tomchuk, Remedial Project Manager, Superfund
U.S. Environmental Protection Agency, Region II, Room 747
26 Federal Plaza
New York, N.Y. 10278

Dear Mr. Tomchuk:

The Saratoga County Environmental Management Council is pleased to submit the enclosed comments regarding E.P.A.'s proposed Phase 2 Work Plan for the Hudson River PCB Reassessment Program. The enclosed comments were prepared by Mr. David Adams, P.E., who, along with other members of our Council, has taken an active interest in following the Hudson River PCB Reassessment Program. These comments were discussed and adopted by the Saratoga County Environmental Management Council at its July 15, 1992 meeting and represent the Phase 2 Work Plan concerns/recommendations of this agency.

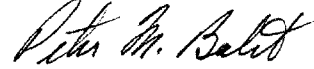
As you will note from the enclosed comments, the Saratoga County Environmental Management Council feels very strongly that due to the immense amount of highly technical information which is going to be generated as part of the Phase 2 Work Plan by way of utilizing assumptions and techniques which are not standard scientific practice, that it is absolutely imperative that the Scientific and Technical Committee be intimately involved not only in the review and evaluation of the highly technical data collected, but also in the evaluation of the Phase II methodology and process. It is also imperative that the assumptions and detailed methodology to be used in the data evaluation be given to the Committee for their review immediately.

Due to the critical importance of utilizing fish monitoring as an environmental indicator of PCB contamination within the Hudson River, the Saratoga County Environmental Management Council feels strongly that contemporaneous fish sampling, preferably to the congener specific level, be conducted in addition to water column and sediment monitoring to obtain a true "picture" of present PCB conditions within the Hudson River ecosystem.

Other concerns/comments of the Council include the ability of following Hudson River water column samples down river without the benefit of dye tracers and that impact assessment of riverine wetland areas be thoroughly evaluated before any sediment monitoring disturbances occur in these highly productive critical environmental areas. Several of our members also stated there is a need for better public definition of a "modelling protocol" in the Phase 2 Work Plan which would more clearly define risk re-assessment of the various project alternatives to be evaluated in Phase III of the project.

The Saratoga County Environmental Management Council appreciates this opportunity to comment on the future of this most important water resource of Saratoga County and New York State.

Sincerely,

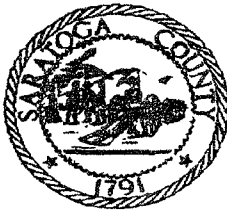


Peter M. Balet, Chairman

PB/bd

Enc.

cc: Mr. William McCabe, Deputy Director, Superfund
Ms. Ann Rychlenski, Community Relations Coordinator
Dr. William Nicholson, Facilitator, Scientific and Technical Committee
Mr. David Adams, Member-at-Large, Saratoga County Environmental
Management Council



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July 21, 1992

Subject: Comments on EPA's Hudson River PCB Reassessment Phase 2 Work Plan
Dated June, 1992

Prepared by David D. Adams, P.E.

1. My overriding comment is similar to one of GE's comments. The draft plan is too general in its presentation. There are several steps that must be gone through to go from the data to be taken in Phase 2 and the existing data base to the final result, PCB levels in fish, which will be the basis for deciding what remedial action, if any, is required. Each of these steps involves calculation procedures and assumptions which either are described inadequately or not at all.

Since these calculations and assumptions are not necessarily universally accepted practice, it is of vital importance that they be subjected to thorough scrutiny. This thorough review is made all the more important when one considers the several hundred million dollar potential cost of remediation and the worrisome thought that a wrong analysis could lead to an action which makes the future situation worse instead of better. EPA's reaction to this concern at the July 10 meeting of the Scientific and Technical Committee was that EPA's internal Quality Assurance review procedures would be sufficient. My position is that this review is so critical that the review process should be extended to include the Scientific and Technical Committee and the public who would be affected by EPA's final decision.

The Committee is obviously best suited to evaluate the technical details of the calculation procedures and assumptions, but I believe making the information available to the public can also be beneficial. If nothing else, the public would have a better appreciation of how to judge EPA's final recommendation and may even have some worthwhile comments to offer.

It should not be difficult for EPA to make this information available since EPA presumably has defined their procedures in order to determine what data is needed in Phase 2. If this is not so, then an additional comment is that Phase 2 should be delayed until there is a solid basis for proceeding.

My specific comment is as follows: EPA should make the detailed calculation procedures and assumptions, including the justification of the assumptions, which will be used to go from the Phase 2 data base to EPA's final decision on remediation available immediately for review by

the Scientific and Technical Committee and to the public for information and comment. At least the Committee review should be accomplished before further expenditure of funds for Phase 2 data collection.

2. The Phase 2 Work Plan does not include taking of any fish samples to obtain data on PCB levels in fish. Rather, NYS DEC data will be used. In view of EPA's stated Phase 1 conclusion that PCB levels in fish are the controlling factor in EPA's evaluation, reliance solely on DEC data is unacceptable. First, the overwhelming significance of PCB levels in fish argues that data contemporaneous in time and space to the PCB data from water and sediment samples should be available to aid in checking the estimates of PCB levels in fish derived from the water and sediment data. Second, the DEC data will not identify specific PCB congeners. EPA's data should do this. This will provide data to use in the risk analysis if EPA should decide that PCB health risks should be on a congener specific basis and may also provide useful information in relation to the congener analysis of the water and sediment samples. An additional comment is that the DEC procedures used to obtain their data should be subjected to review by EPA's Quality Assurance Group and by the Scientific and Technical Committee.

My specific comment is as follows: EPA should include in the Phase 2 Work Plan sufficient fish samples taken at the same locations and time as the water and sediment samples. The PCB analyses of the fish should be done on a congener specific basis. Also, EPA should subject DEC's procedures for obtaining PCB levels in fish to review by EPA's Quality Assurance group and by the Scientific and Technical Committee.

3. EPA plans to take water column samples in such a manner as to follow a parcel of water as it flows downstream but is not planning to use any tracer such as dye to trace the water parcel. Without a tracer it is not clear how a water parcel can be followed. EPA should reconsider the use of dye as a tracer or justify how the parcel can be followed - use of clock time is not considered to be accurate enough for the intended use of this information.

My specific comment is as follows: EPA should reconsider the use of dye as a tracer to follow water parcels as they flow downstream or justify how the desired parcel identification can be made with sufficient accuracy in the absence of a tracer.

4. Specific Comment: Section 8.5 of the Work Plan discusses impact assessment of sediment disturbance. EPA should modify the wording of this section to insure that impact assessment to wetlands along the river bank is performed as these areas of the Hudson River are considered to be of major environmental importance.
5. Specific Comment: Page 3-15 of the Work Plan discusses using sediment PCB analyses to evaluate historic trends of PCB's in the water column. The procedure for accounting for possible PCB degradation over time in the sediments in this evaluation should be specified.

6. Specific Comment: Page 3-13 of the Work Plan states that dating by radionuclide techniques in other applications as justification for use of this method in this study but no references to these other applications is given. The references should be given so that evaluation can be made of the applicability of the use of radionuclide dating in these other situations to the Hudson River study.
7. Observation: It is noted that the GE comments on the Phase 2 Work Plan handed out at the briefing in Schuylerville on July 9 included recent information on the health effects of PCB's. This information indicated that there is a definite difference in the effects of different PCB congeners and even that the congeners found in the Hudson River may not be carcinogenic. In view of the high costs and potential risks of remedial actions, it is strongly recommended that EPA seriously evaluate this information and hopefully revise the risk assessment procedure for PCB's to recognize the difference between congeners similar to what EPA has done in evaluating the health risk of dioxins.