

70050

COMMENTS ON PHASE 2 WORK PLAN  
HUDSON RIVER PCB REASSESSMENT RI/FS  
AGRICULTURAL LIAISON GROUP

July 23, 1992

As chairman of the Agricultural Liaison Group, I would like to offer these comments on the Phase 2 Work Plan:

1. We were pleased to see that congener specific analysis will be done on all water and sediment samples. It was suggested in our liaison group meeting that the fish analysis should also be congener specific.
2. The number of sediment and water samples taken and their location raises some question. It seems like a small number for such a large river. Further, on page 2-8, the statement is made that "it MAY be possible to characterize sediment PCB levels extensively without having to sample intensively." When and how would the decision be made as to whether this sampling method did correctly characterize the sediments?
3. There appears to be an impressive amount of data being derived from the sediment sampling. Looking at deposition patterns, erodibility, and even carbon/nitrogen levels to detect remnants of the old Fort Edward Dam certainly shows an ambitious approach to learning the "ways of the Hudson". Hopefully this information can give an accurate picture of how the PCBs have moved.
4. Much of the perceived risks of the PCB sediments in the Hudson seems to relate to the possibility of a "100 year" flood. Given the present location of dams for flood control in the Upper Hudson, is the risk of a "100 year" flood a real one? It would seem that the chances of this are very remote. We would like to see the risk of sediment scouring carefully scrutinized with this in mind.
5. The importance of the fish analysis in this process is very great as they seem to offer the only pathway of unacceptable human health risk at this time. The fact that the NYDEC is doing all the fish sampling makes several members of our group very nervous. The NYDEC's obvious bias toward a dredging alternative for remediation gives them a strong conflict of interest.
6. We are happy to see reevaluation of the human health risk assessment. We certainly feel the level of average exposure should be reconsidered. We feel that the high assumptions of Phase 1 inflated the calculated risk of "average" fish consumption.
7. Section 8.3 introduces the aspect of this project which most directly affects agriculture. This evaluation of potential impacts of various remediation techniques will be anxiously monitored by the members of our group. We would particularly appreciate being informed of developments in this area.

In conclusion, we would hope that the sampling techniques outlined in this work plan are indeed effective in determining the concentration of PCBs in the river sediments. We applaud

efforts outlined to detect the impact of other sources of PCBs and hope that these efforts are carried far enough. Congener specific analysis is a great idea for water and sediment samples. We can also see the logic of using congener specific analysis on the fish samples, too. Perhaps this could be done later if significant amounts of "other" PCBs were detected in Lower River sediments. Finally we would like to see projected scouring and flooding considered at "realistic" levels. We believe that the threat of even a "100 year" flood may be overestimated.

Sincerely,

*Thomas A. Borden*

Thomas A. Borden  
Chairman  
Agricultural Liaison Group