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U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric
Administration

NATIONAL OCEAN SERVICE
OFFICE OF OCEANOGRAPHY AND MARINE ASSESSMENT
OCEAN ASSESSMENTS DIVISION
Hazardous Material Response Branch
26 Federal Plaza, Room 734
New York, New York 10278

September 29, 1992

Mr. Douglas Tomchuk, Remedial Project Manager
New York/Caribbean Superfund Branch II
Emergency and Remedial Response Division
U.S. Environmental Protection Agency
26 Federal Plaza
New York, NY 10278

Re: Hudson River PCB Site Revised RI/FS Work Plan

Dear Mr. Tomchuk:

Thank you for the opportunity to review the revised Phase II RI/FS Work Plan for the Hudson River PCB Site. The following comments are submitted on behalf of NOAA:

7-1 The discussion on the Ecological Assessment states it will be performed for selected sites. We suggest the language be changed to state the "Ecological Assessment will be performed for the Hudson River using information from selected sites sampled during the investigation."

7-4 The last paragraph should read "...characterization is limited to PCBs."

7-5 What happened to the discussion of the Correlation analysis, the BAF approach? Some of that discussion from the earlier work plan on the Exposure assessment would be useful in this section.

7-5 The last paragraph implies that the benthic study will address the main endpoint of concern. As discussed previously, this is clearly not the case. We suggest the following re-wording:

"As recommended ..., a field effort will be included as part of the ecological effects component. [delete sentence starting with "This effort will..."]. Benthic community assessment will be conducted at two test sites of known high PCB concentrations and one reference area in the Upper Hudson River. [Delete "whether any PCB-related signs of stress are present"]. Study will examine community structure, presence of pollution tolerant species, absence of indicator species, etc."

7-6 Then weight of evidence approach cannot be used to "quantify ecological risks". We suggest using "evaluate" or "assess" ecological risks instead.

A-17 Previous data were to be used for well-characterized areas with very high PCB levels, such as the Thompson Island Pool, instead of relying on five samples.

A-18 The last paragraph should provide a description of characteristics of the sampling location.



A-19 The fourth sentence should read "Biomass measurements by major taxa will be used...". It is important that the reference and test stations be matched with the stations sampled for the benthic study.

Miscellaneous comments:

The objectives of the Ecological Assessment should be clearly defined. For example: Do the PCBs in the Hudson River pose a risk to ecological receptors? Is the risk higher in specific locations or for particular organisms? Would remediation in the Upper Hudson reduce this risk?

The introduction should state that though the remedial action will be limited to the upper portion of the Hudson River, an evaluation of the effect of remediation on the entire site will be conducted.

A notation should be made regarding the incorporation of the fish data to be collected by the natural resource trustees into the Ecological Assessment if they are made available to EPA at the appropriate time.

Attached you will also find some additional comments submitted by NOAA regarding recommendations for clarification of the planned activities.

Sincerely,



Frank G. Csulak and Diane E. Wehner
Coastal Resource Coordinators

cc: W. McCabe, DDNYCP
J. Field, HMRAD/NOAA
A. Giedt, OGC/NOAA

DATE: September 28, 1992

TO: Jay Field
Diane Wehner

FROM: Mary Matta *Matta*

SUBJECT: Review of Phase 2 Workplan Hudson River

Post-It™ brand fax transmittal memo 7671		# of pages <i>2</i>
To	<i>Diane Wehner</i>	
Co.	NOAA/NOS/N/CRCA3	
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This document describes a workplan for an ecological risk assessment for the Hudson River. Five tasks are described in the introduction that are generally consistent with EPA guidance on conducting risk assessments. However, the specific descriptions of work to be performed for each task are not consistent with the descriptions provided on page 7-2 of the work plan. Site Description and Characterization of Stress appear to combine to provide an Exposure Assessment. It appears that previous components of the draft workplan have been forced into the risk assessment framework and that it is not always a good fit. For example, predicting body burden concentrations does not provide exposure point concentrations. The benthic invertebrate study may not be an appropriate choice for characterizing ecological effects.

Page 7-3: Problem Formulation: In addition to describing objectives and scope and identifying pathways, receptors, and endpoints, this task will identify known ecological effects. The description of this task on page 7-2 does not include identifying known effects.

Page 7-4: Site Description and Characterization: This description focuses on selecting receptors, summarizing PCB concentrations in water, sediment, and biota, and evaluating habitats. It is unclear how habitats will be evaluated. This description is not consistent with the description of this task given on page 7-2 (potential exposure pathways will be discussed).

Page 7-4: Characterization of Stress: This task does not appear to be substantially different than the Site Description task. Receptors, exposure pathways, and exposure point concentrations will be described. On page 7-2, this task is described as quantifying exposure point concentrations. In addition, body burdens of exposed organisms will be estimated using sediment, water, and invertebrate concentrations. It is not clear how estimating body burdens will quantify exposure point concentrations.

Page 7-5: Characterization of Ecological Effects: This task will identify levels of PCBs at which adverse effects on selected receptors are observed. This will be conducted through a literature search and a benthic invertebrate study. However, on page 7-2, this task is described as defining endpoints of concern. Does this indicate that benthic community structure is the primary endpoint of

concern? If so, some justification of this conclusion should be provided. The benthic community work is also intended to assist in the evaluation of potential impacts of various remedial alternatives on the biota. This objective should be deleted since benthic community studies will not assist in the evaluation of remedial alternatives.

Page A-18. Temperature, dissolved oxygen, pH, and salinity will be measured in the field. Will these measurements be made on bottom water or on sediment pore water?

Page A-19. Baseline, maximum impact, and mid-range impact stations will be extensively sampled. It is not clear what this means or how this data will be used. Do these terms relate to sediment PCB concentrations, or to stations identified as impacted based on benthic invertebrate communities? The benthic invertebrate study should be described in more detail. The type of coring device and method of deployment should be described. The mesh size used to sieve the samples should be specified (0.5 or 1.0 mm).