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Douglas Tomchuk
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Dear Doug,

In reviewing the HUDSON RIVER PCBs REASSESSMENT RI/FS *EVALUATION OF REMOVAL ACTION ALTERNATIVES THOMPSON ISLAND POOL EARLY ASSESSMENT*, I must commend TAMS CONSULTANTS, Inc. for doing a very comprehensive job. I would like to suggest another alternative relative to dredging.

One of the concerns with dredging is stirring up the bottom of the river (under water) and allowing the PCB-containing sediments to be carried downstream. I have observed (but not scrutinized) that, during periods of very low summer flow and during the winter when the river is drawn down to allow for spring runoff, numerous sections of the river bottom are completely exposed. During these times, sediments in the exposed areas could be removed by means of bulldozers and backhoes as a "dry" operation. I could visualize dredging a portion of the stream to a deeper channel, and then diverting the flow to this channel, thus allowing the previously inundated portion to be dredged in a similar manner. With controlled discharges from the Sacandaga Reservoir and possibly a few coffer dams, I would think that a significant portion of the river bottom could be exposed for this type of dredging. Further, if the river is deepened by dredging, there will be less likelihood of stirring up bottom sediments during future high flows.

I realize this does nothing to ameliorate the problem of disposal of such dredgings. However, if dredging is considered the best means of reducing the non-existent problem of PCBs, then I believe this idea should be investigated.

Thank you for at least considering this suggestion.

Yours truly,

Donald B. Aulenbach, PhD, P.E., DEE