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## Facsimile Transmittal

**To:** Alison Hess, USEPA, Region 2

**Fax:** (212) 637-4439

**From:** Rich Schiafo, Scenic Hudson

**Date:** January 28, 2000

**Re:** Hudson River HHRA/ERA Addendum Comments

**Pages:** 3, including cover

Alison,

Please find attached Scenic Hudson's comments on the most recent risk assessments. This is the same statement I submitted at the January 11, 2000 meeting. I hope this format is okay.

Rich Schiafo  
Scenic Hudson

U.S. EPA, REGION II  
EMER. & REM. RES. DIV.  
2000 JAN 28 PM 4:29  
DIRECTOR'S OFFICE

10.4140



*Protecting the Valley's Environment, Town by Town*

Sent by Facsimile

January 28, 2000

Alison A. Hess, C.P.G.  
USEPA Region 2  
290 Broadway - 19<sup>th</sup> Floor  
New York, NY 10007-1866

RE: Hudson River HHRA/ERA Addendum Comments

The findings of the Human Health Risk Assessment for the Mid-Hudson River and the Ecological Risk Assessment Addendum: future risks in the lower Hudson River continue to underscore the need for an aggressive PCB cleanup of the upper Hudson River. With human health risks and ecological risks exceeding acceptable levels into the foreseeable future, for 200 miles of the Hudson River, it becomes even more critical than ever that the EPA move forward with a cleanup decision as soon as possible.

The EPA has pledged to develop and release a plan by the end of this year that will serve as the basis of a cleanup decision. In light of the most recent findings, this process must continue to move forward and no additional delays will be acceptable. Any requests for additional study or "side-by-side" peer review should in no way impede the Reassessment schedule. The EPA should move forward with peer review of EPA documents and EPA documents only, despite pressure for "side-by-side" peer review and work towards a cleanup of Hudson River PCBs.

Due to the limited effectiveness of the fish consumption advisories and the continued need for more education about the PCB contamination of fish in the Hudson River, the EPA should continue to assess the risks in the Hudson assuming that such advisories do not exist. Angler surveys have indicated that the majority of anglers eat their catch or give it to family members. In its 1996 survey, the New York State Department of Health found that "two-thirds of anglers fishing between Catskill and the Tappan Zee Bridge continued to report eating their fish at least sometimes and almost half (46%) of anglers gave fish away sometimes or frequently. More than half (57%) of anglers in this area ate more fish than advised by the NYS DOH advisories."<sup>1</sup>

<sup>1</sup>Health Consultation: 1996 Survey of Hudson River Anglers, Hudson Falls to Tappan Zee Bridge at Tarrytown, New York, Public Review Draft, February 1999, New York State Department of Health, Center for Environmental Health, prepared under a Cooperative Agreement with U.S. Department of Health & Human Services, Public Health Service, Agency for Toxic Substances and Disease Registry, p. 14.

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Alison A. Hess, C.P.G.

January 28, 2000

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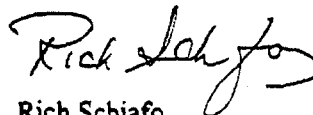
In both (the Hudson River Sloop Clearwater Survey and the NYS DOH Survey "the fish that anglers kept were among the most contaminated species in each part of the river."<sup>2</sup>

As EPA has concluded the 1996 NYS DOH Angler Survey also concluded that "Some anglers and others who eat fish from the Hudson River are being exposed to levels of PCBs that are a health concern and are at risk of adverse health effects."<sup>3</sup> Institutional controls, such as the fish advisories, are not a substitution for a cleanup of the Hudson River as has been suggested by the General Electric Company. It is important to note that due to the PCB contamination of fish, women of childbearing age and children are advised not to eat any fish, from any location along the Hudson.

New scientific information concerning non-cancer health effects of PCBs has shown that the Food and Drug Administration 2 parts per million (ppm) level, on which New York State advisories are based, is not adequately protective of human health. The scientific and public health community now advocates a much lower level. Based on EPA's most recent findings for non-cancer health risks that eating fish from the mid-Hudson results in PCB exposure that is 30 times higher than EPA Hazard Index Reference level, it is imperative that EPA adopt a much lower level than the FDA level of 2 ppm. The EPA should adopt a level no greater than 0.1 ppm as has been done recently by the State of Connecticut for their fish advisories.

The alarming reality that human health and ecological resources of the Hudson River are threatened from Fort Edward to New York City, reminds us that 200 miles of this great River is and will continue to be severely impacted by the PCB contamination that started some 60 years ago. These most recent reports, in conjunction with other EPA findings, indicate that the sediments are the dominant source of PCBs to the rest of the river system and that the natural breakdown of PCBs is inappreciable, provides compelling and irrefutable evidence for the need to remove PCB-contaminated sediment from the upper Hudson River.

Respectfully Submitted,



Rich Schiafo  
Scenic Hudson

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<sup>2</sup> Ibid.

<sup>3</sup> Ibid.