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AUG 13 1999

Town of Northumberland
P.O. Box 128 - Catherine Street
Gansevoort, New York 12831

To Whom It May Concern:

This is in response to your letter to EPA Administrator Carol M. Browner and others, concerning the Hudson River PCBs Superfund site. Specifically, your letter forwards a resolution stating that the Town of Northumberland supports an independent peer review of all PCB-modeling studies developed for the Hudson River PCBs Superfund site.

With respect to the peer review process, I believe it would be useful for me to clarify for you some aspects of EPA's peer review policy to avoid any misunderstanding about the peer reviews being conducted for this site. EPA's policy generally requires the Agency to subject to peer review those major Agency technical work products, such as risk assessments and technical models, that are innovative or focus on significant emerging issues and serve to support Agency decision-making. At the Hudson River PCBs site, specific issues in EPA's scientific work are being reviewed in four distinct sessions. Two of the six reports prepared in connection with the Hudson River PCBs Reassessment -- the Data Evaluation and Interpretation Report and the Low Resolution Sediment Coring Report -- were reviewed earlier this year. EPA's Modeling Approach, including EPA's Preliminary Model Calibration Report, was peer reviewed in September 1998. The Baseline Modeling Report, which is EPA's modeling report for the site, and the Human Health and Ecological Risk Assessments, will be peer reviewed next year to ensure that all six scientific work products that support a remedy decision will receive a critical evaluation by independent experts.

The purpose of the peer review is to ensure that EPA's science is technically sound; it is not intended to be a forum in which the peer reviewers judge what they believe to be the best among two or possibly more scientific work products. EPA therefore will not provide a side-by-side peer review involving EPA's modeling report. Nevertheless, EPA has agreed to provide the peer reviewers with copies of public comments received on its reports and the Agency's responses to these comments, which are documented in responsiveness summaries. The responsiveness summary that will be provided to the peer review panel for EPA's Baseline Modeling Report will include a copy of GE's modeling report and EPA's response to that report.

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In addition, as with the prior two peer reviews for this site, the public will be invited to attend the peer review meetings for the Baseline Modeling Report, Human Health Risk Assessment and Ecological Risk Assessment. The public also will be invited to address the peer review panels for the upcoming peer reviews, just as the public was given the opportunity to address the expert panels for EPA's Modeling Approach and Data Evaluation and Interpretation Report/Low Resolution Sediment Coring Report peer reviews.

We hope that this letter addresses your concerns. EPA appreciates your interest in the Reassessment process, and we encourage you to continue to express your concerns regarding the Reassessment. If you have any questions or require more information, please feel free to contact Ann Rychlenski at (212) 637-3672.

Sincerely yours,

Richard L. Caspe, Director
Emergency and Remedial Response Division

bcc: Ann Rychlenski, CD
Douglas Fischer, ORC

TOWN OF NORTHUMBERLAND
RESOLUTION #33 OF 1999

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cc- Caspi/action

REQUESTING USEPA TO CONDUCT PEER REVIEW AND/OR
RECONCILIATION OF ALL MODELING INFORMATION RELATING TO
THE HUDSON RIVER SUPERFUND PCB REASSESSMENT PRIOR TO
DETERMINING HUMAN HEALTH AND ECOLOGICAL RISKS.

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WHEREAS, the Hudson River is a major and important water resource of the Nation, New York State and the County of Saratoga, forming the northerly and easterly boundaries of Saratoga County and the Town of Northumberland

WHEREAS, during a 30 year period ending in 1977 some 1.1 million pounds of PCB's were discharged into the Hudson River from two GE capacitor manufacturing plants located in Ft. Edward and Hudson Falls, New York; and

WHEREAS, the US Environmental Protection Agency (USEPA) has identified the Hudson River from Hudson Falls to the Battery as a federal Superfund Site and is presently conducting a federal Hudson River Superfund PCB Reassessment to determine whether remedial actions are warranted; and

WHEREAS, the County of Saratoga with the assistance of its Environmental Management Council has since 1992 been actively involved in reviewing and commenting on various Hudson River Superfund PCB reassessment reports completed by USEPA; and

WHEREAS, USEPA and GE have recently completed independent modeling reports with disparate conclusions which will be instrumental in determining the degree of health and ecological risks posed by PCB contamination of the Hudson River and ultimately the decision of whether to dredge or not; and

WHEREAS, the importance of utilizing the most scientifically correct models in reaching human health and ecological risk determinations cannot be overstated, it being one of the most critical components of the reassessment's decision-making process; and

WHEREAS, the Town of Northumberland believes there is a need to conduct a comprehensive peer review of both USEPA's and GE's Reassessment models to resolve major technical differences between them before utilizing the most scientifically correct modeling information to research human health and ecological risk determinations concerning PCB contamination of the Hudson River; and

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US EPA

WHEREAS, the USEPA has refused to incorporate GE's modeling information into the Agency's peer review process and will utilize its own models prior to any peer review process to make human health and ecological risk assessments in August 1999 which will be the basis of making a decision of whether to dredge PCB's from the upper Hudson River or not; now therefor, be it

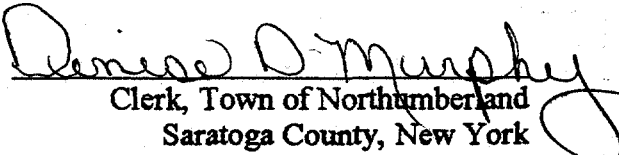
RESOLVED, the Town of Northumberland Town Board requests, due to the importance of the Hudson River resource, the US Environmental Protection Agency take the additional time necessary to conduct a comprehensive peer review and/or reconciliation of all modeling information in an effort to use the most scientifically correct Reassessment modeling information as a basis for the Hudson River Superfund PCB Reassessment decision-making before completing human health and ecological risk assessment scheduled to be released in August of 1999; and be it further

RESOLVED, the Town of Northumberland Town Board transmit copies of this Resolution to Carol Browner, Administrator, USEPA; Jeanne Fox, Region 2 Administrator, USEPA; John Cahill, Commissioner NYSDEC; the Honorable George Pataki, Governor; and all state and federal elected officials representing the Town.

**STATE OF NEW YORK
COUNTY OF SARATOGA**

I, Denise d. Murphy, Clerk for the Town of Northumberland, do hereby certify that the foregoing is a true copy, and the whole thereof, of a Resolution duly adopted by the Town Board of said County on the 12th day of July, 1999.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed hereto the official seal of said Town this 13th day of July, 1999.


Clerk, Town of Northumberland
Saratoga County, New York