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SEP 16 1999

Harold E. Robillard, Clerk
Warren County Board of Supervisors
Municipal Center
1340 State Route 9
Lake George, New York 12845-9803

Dear Mr. Robillard:

This is in response to your letter to EPA Regional Administrator Jeanne Fox, concerning the Hudson River PCBs Superfund site. Specifically, your letter forwards a resolution stating that the Warren County Board of Supervisors 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

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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. 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

Warren County Board of Supervisors

RESOLUTION NO. 444 OF 1999

Resolution introduced by Supervisors Monroe, O'Neill, Belden, Montesi,
Center, Quintal and Bennett

SUPPORTING WASHINGTON COUNTY RESOLUTION NO. 180 OF 1999 AND TOWN OF
FORT EDWARD RESOLUTION NO. 40 OF 1999 BOTH ENTITLED, "URGING EPA TO
SUBMIT BOTH ITS AND GE'S MODEL TO SIMULTANEOUS, INDEPENDENT PEER
REVIEW"

WHEREAS, Washington County and the Town of Fort Edward have adopted resolutions
(Resolution No. 180 of 1999 and 40 of 1999, respectively), both entitled, " Urging EPA to Submit
Both Its and GE's Model to Simultaneous, Independent Peer Review", and

WHEREAS, said resolutions state that the EPA and General Electric Co. have, each, recently
developed computerized models to simulate river dynamics and forecast future progress in relation
to the Hudson River's recovery, and

WHEREAS, the models both predict future recovery for the river but differ as to the time that
recovery will take, and

WHEREAS, Congressman John Sweeney has announced his desire to have both models
reviewed by an independent panel of scientists convened by the General Accounting Office, and

WHEREAS, EPA has refused repeated requests to agree to a simultaneous scientific peer
review of both its model and the GE model by qualified, independent experts and plans to use the
projections from its model in the development of ecological and human health reports even before
the model has been examined by independent scientists, now, therefore, be it

RESOLVED, that the Warren County Board of Supervisors hereby supports Washington
County Resolution No. 180 of 1999 and Town of Fort Edward Resolution No. 40 of 1999 both
entitled, "Urging EPA to Submit Both Its and GE's Models to Simultaneous, Independent Peer
Review", and urging EPA to reverse its opposition and promptly submit both its model and the GE

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model to independent peer review simultaneously before any model projections are used as the basis for any other Hudson River reports, and be it further

RESOLVED, that the Clerk of the Board of Supervisors be, and he hereby is, authorized and directed to forward copies of this resolution to the New York State Association of Counties; Governor George E. Pataki; Senator Ronald B. Stafford; and Assemblywoman Elizabeth Little; Inter-County Legislative Committee of the Adirondacks; U.S. EPA Administrator Carol Browner; Regional EPA Administrator Jeanee Fox; U.S Senators Moynihan and Schumer; Congressman Sweeney; County of Saratoga; County of Rensselaer; and Fort Edward Town Board.

STATE OF NEW YORK)

)ss.:

COUNTY OF WARREN)

I, HAROLD E. ROBILLARD, Clerk, of the Board of Supervisors of the County of Warren, do hereby certify that the foregoing is a true and correct copy and the whole thereof of a Resolution duly adopted by the Board of Supervisors of the County of Warren, Lake George, New York on the 13th day of August, 1999.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the Board of Supervisors on this 13th day of August, 1999.



Clerk, Board of Supervisors
Warren County

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