

OCT 20 1999

Pauline D. Levo, Town Clerk  
Town of Greenfield  
Town Hall  
P.O. Box 10  
Greenfield Center, New York 12833

Dear Mrs. Levo:

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 Town of Greenfield 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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SYMBOL -->	ERRD-SP/CT	ERRD-SP/CT	ERRD-DD	ERRD-D				
SURNAME -->	Hughes	Hauptman	McCabe	Caspe				
DATE -->	10/19	10/19		10/19				

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

# Town of Greenfield

FOUNDED 1793

*For  
Muszyński  
cc: Caspe / Action*



TOWN HALL  
P.O. BOX 10

GREENFIELD CENTER, NY 12833  
PHONE (518) 893-7432  
FAX (518) 893-2460

*Response due  
10/4/99  
Direct Reply*

RESOLUTION # 122 - Request USEPA to conduct peer review and/or reconciliation of all model information relating to the Hudson River Super-Fund PCB reassessment prior to determining human, health and ecological risks.

Motion: Chamberlin, C.  
Seconded: Mihalek, C.

WHEREAS, the EPA and the General Electric Co. have each recently developed computerized models to simulate river dynamics and forecast future progress in the river's recovery, and  
WHEREAS, these computer models are likely to be the best available quantitative tools on which to base future policy decisions about the river, and

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

WHEREAS, the use of inaccurate, outdated or misinterpreted data could lead the EPA to order an unnecessary and destructive dredging and dumping project with serious long-term environmental, social and economic damage to neighboring communities to the river, and

WHEREAS, an open and public access designed to narrow and reduce the risk of error and foster a higher level of public confidence in EPA's ability to make the correct decision, and

WHEREAS, Congressman John Sweeney has announced his intention to send both models for through review by an independent panel of scientists convened by the General Accounting Office, and

WHEREAS, the EPA has refused repeated requests to agree to a simultaneous scientific peer review of both its model and the General Electric Co. model by qualified, independent experts, and

WHEREAS, the EPA plans to use the projections from its model despite refusal to agree to simultaneous review in the development of ecological and human health reports, NOW,  
THEREFORE,

BE IT RESOLVED, that the Town Board of the Town of Greenfield urges the EPA to reverse its opposition and submit both its model and the GE 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 simultaneous peer review be conducted in an open public meeting with full opportunity for public comment and discussion by citizens and elected officials of the Town of Greenfield and Saratoga County and all other interested parties, and

BE IT FURTHER RESOLVED, that copies of this Resolution be sent to U.S. EPA Administrator Carol Browner, Regional EPA Administrator Jeanne Fox, U.S. Senators Moynihan and Schumer, Governor Pataki, Congressman Sweeney, State Senator Hugh Farley, Assemblyman James Tedisco, the Board of Supervisors of Saratoga County, and the Town Board of the Town of Fort Edward.

VOTE: Ayes: Stokes, Chamberlin, Mihalek

Noes: None

Absent: Sipperly, Strauss

BEFORE ME, I HEREBY CERTIFY that the above Resolution was duly adopted by the Town Board at a regular meeting held on August 12th, 1999.

1999 SEP 17 PM 12:44

US EPA

*Pauline D. Levo*  
Pauline D. Levo, Town Clerk

10.6068

Controlled Correspondence For  
REGION 2

CONTROL NO : R2-9901582

ORIG. DUE DATE: 10/04/99

STATUS: PENDING

CORRES. DATE:  
RECEIVED DATE: 09/17/99  
ASSIGNED DATE: 09/17/99  
CLOSED DATE:

FROM: LEVO, PAULINE  
ORG:  
SALUTATION:  
CONSTITUENT:

TO: FOX/JEANNE  
TO ORG: EPA- REGION 2  
SUBJECT: RESOLUTION - PCB HUSON RIVER

ASSIGNED: Emergency and Remedial Response Division

COPIES OF INCOMING PROVIDED TO: RA, DRA

SIGNATURE: DIRECT REPLY  
R2 COMMENTS:

R2 INSTRUCTIONS:

U.S. EPA. REGION II  
EMER. & REM. RES. DIV.  
1999 SEP 21 PM 4:58  
DIRECTOR'S OFFICE

Please include this control slip and extra copy of reply for CCO. (Do not include attachments with CCO copy).

If correspondence has been misdirected or if an extension is needed, please notify CCO immediately @ 3582

(ONLY FOLLOW HIGHLIGHTED INSTRUCTIONS)

	Assigned	Date Assigned	Code/Status	Date Completed by Assignee	Date Returned to R2 :
Lead	ERRD	09/17/99	ACTION	-	-

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US EPA

*Pauline D. Levo*  
Pauline D. Levo, Town Clerk

10.6070