



July 20, 1992

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Mr. Douglas Tomchuk  
Remedial Project Manager  
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Region II  
Jacob K. Javits Federal Building  
New York, NY 10278

**Re: Comments on Phase 2 Work Plan  
and Sampling Plan: Hudson River  
PCB Reassessment RI/FS**

Dear Mr. Tomchuk:

On behalf of Scenic Hudson, I attended the public information meeting on the Phase II Work Plan on June 18 and the Scientific and Technical Advisory Committee meeting on July 10. The comments herein are based both on our review of the Phase II Work Plan document and on discussions that took place at the two meetings.

**Scope of Phase II**

**\* PCB Transport and Fate**

While some aspects of the Phase II Work Plan may be to assure compliance with Superfund Reassessment guidelines, it has been clear from the outset of this process that EPA has had considerable discretion in defining the amount of information that would be required to "support an informed decision regarding which new remedy, if any, appears more appropriate than the current, no-action alternative". (Scope of Work, Hudson River PCB Reassessment RI/FS, Dec. 1990)

The scope that has been defined for the sampling plan is expansive and seeks to answer complex questions about the transport and fate of PCBs throughout the entire estuarine system.

We do not take exception with EPA/Tams preliminary assessment that the area of impact from PCBs in the upper Hudson is extensive and includes the estuarine Hudson. However, we do question the necessity for answering global questions about PCB transport and uptake in order

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Mr. Douglas Tomchuk  
July 20, 1992  
Page 2

to reach an management decision about PCBs in the upper Hudson. We are not confident that the extensive studies proposed, although time consuming, will yield definitive answers, or allow meaningful projections, about the effectiveness of PCB removal in the upper Hudson on rate of reduction of PCB levels in fish throughout the estuarine system. The fact that the upper Hudson itself is a heavily PCB-polluted environment that needs remediation in its own right should not get lost in the extensive sampling and analysis program that has been laid out in the Phase II Work Plan.

\* Other Sources of PCBs

Increasing pressure has been brought to bear on EPA to extend the sampling and analysis program to evaluate other sources of PCBs in the lower Hudson River. While we are concerned about other sources of PCBs in the Hudson and believe that they need to be studied and rectified wherever possible in the future, we strongly urge EPA to limit the scope of potential remedial activities at this time to the PCB contaminated sediments between Hudson Falls and the Federal Dam at Troy.

\* Feasibility Analyses

The final section of the Plan addresses "Feasibility Study Analyses". We believe that it is important for this analysis to be carried out concurrent with the other work presented in the Plan, as it may be necessary to alter some aspects of the sampling done to better answer questions about feasibility. If feasibility analysis is left to the end, opportunity for meeting sampling needs efficiently may be lost.

Schedule

Scenic Hudson continues to be concerned about the protracted schedule for the Hudson River PCB Reassessment. Once proposed as a twelve month Reassessment, the process is now stretching into a five year undertaking at the very least. The prolonged schedule means that additional tons of PCBs will be dispersed into the environment and with the passage of additional time, an actual clean-up seems to become ever more elusive.

Mr. Douglas Tomchuk  
July 20, 1992  
Page 3

The research agenda that is laid out in the Phase II Work Plan is extensive and clearly will take at least as long has been projected. In fact, you have already acknowledged that these projections for completion will be difficult to achieve. We urge, therefore, that every effort is made to expedite the sampling and analysis program as much as possible.

Specifically, we are aware that GE has requested that EPA hold additional (monthly) meetings to review and discuss the sampling and analysis methodologies. While clearly all the parties have countless questions about the ways EPA will conduct its work, we believe that additional meetings will only sandbag the process and that existing committee structures should provide sufficient opportunity for discussions of this sort.

We look forward to continuing to work with you in reaching a solution to the Hudson River PCB problem.

Sincerely,



Cara Lee  
Environmental Director

/rmm