

70301

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CEASE (?) Comments
on Phase II workplan
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1. The Phase II work plan seems to be comprehensive. However, without the Phase I responsiveness summary, it is impossible to tell what gaps in information have been identified and what the specific goals of this work plan are.
2. The proposed work plan includes NYSDEC fish sampling through 1991. Will this sampling be congener specific? If now, I would strongly recommend that this be done.
3. What is the role of the Scientific and Technical Committee for Phase II. This committee played a role in reviewing the Phase IIA sampling plan and there is no indication of their role in Phase II.
4. I understand that Dr. Bopp will be responsible for some of the analysis. Dr. Bopp is a former DEC employee and vocal dredge advocate. I feel strongly that there is a need for overview of all work provided by Dr. Bopp or that a replacement be appointed. It is important to note that many people taking part in this reassessment come to the process with an agenda. However, no other person is serving in an advisory capacity.
5. We need more information on the Monte Carlo method which will take another look at the health risk assessment. I request an informational meeting to be held in the Fort Edward area to explain this method.
6. Much of the proposed Phase II sampling requires the use of archived core samples. Can you explain how you have sufficient knowledge of how these samples have been taken, stored and handled to rely on these samples for developing the type of studies you are aiming for.
7. Part of Phase II is to identify trends using the old data that ~~have~~ been collected in past studies. Can you explain how this will be possible due to the fact that new methodology would yield far different results.