

**HUDSON RIVER PCB REASSESSMENT
COMMUNITY INTERACTION PROGRAM**

**HUDSON RIVER OVERSIGHT COMMITTEE MEETING
THURSDAY, APRIL 4, 1991
6:00 PM
POUGHKEEPSIE, NEW YORK**

MINUTES

The Hudson River Oversight Committee (HROC) for the Hudson River PCB Reassessment RI/FS held its initial meeting in the Fireside Lounge in the Marist College Campus Center Building, Poughkeepsie, New York. The agenda is attached. The meeting began at 6:00 PM and was attended by the following HROC members:

George Pavlou	HROC Chair, Deputy Director, ERRD, U.S. EPA, Region 2
Doug Tomchuk	Project Manager, U.S. EPA, Region 2
Ann Rychlenski	Steering Committee Chair and Community Relations Coordinator, U.S. EPA, Region 2
Albert DiBernardo	Project Manager, TAMS Consultants, Inc.
Steve Hammond	NYSDEC Director, Remedial Bureau
Judy Schmidt-Dean	Chair, Citizen Liaison Group
Bridget Barclay	Chair, Environmental Liaison Group
Thomas Borden	Chair, Agricultural Liaison Group
Daniel Abramowicz	Chair, Science & Technical Committee
Paul F. Lilac	Co-Chair, Governmental Liaison Group
John King	NYSDOT, Waterways Maintenance Division
Frank Csulak	NOAA, Coastal Resource Coordinator
Bill Patterson	Department of the Interior
John Claussen	GE, Manager, Hudson Project Team
Ron Tramontano	NYSDOH, Superfund Group
Italo Carcich	NYSDEC, Project Sponsor Group
Arthur Block	ASTDR, U.S. EPA, Region 2
Monte Greges	Army Corps of Engineers, NY District

In addition, a number of observers attended the meeting including Mel Hauptman, Section Chief, U.S. EPA; Region 2 Bill Ports, NYSDEC; Carl Deppe, Co-Chair, Environmental Liaison Group; Karen Coghlan, TAMS Community Relations Coordinator; and representatives of Scenic Hudson, CEASE, GE, and the Greene County Farm Bureau.

The meeting was opened by George Pavlou who welcomed the participants and gave a brief overview of the site history within Superfund and the reason for the current reassessment. In addition, he outlined the role of HROC as:

- (1) Oversee the Hudson River Reassessment Project;
- (2) Ensure consideration of public viewpoint in the study;
- (3) Issue technical advice and guidance; and
- (4) Identify and resolve major policy issues

In his introductory remarks, Mr. Pavlou further indicated that the role of HROC is to exchange information and resolve issues. Those issues which cannot be resolved by the HROC will be presented to upper management at EPA for resolution. Mr. Pavlou indicated that EPA has an 18-month schedule for the project, and is looking to have a scientifically credible report by August, 1992.

Albert DiBernardo of TAMS Consultants, Inc. provided an overview of the work to be performed in each of three phases. He stated that the Phase I Report is an interim report to be provided to the various committees for project input and focus. He further explained that the Site Characterization or Remedial Investigation component of the work will be performed during Phases 1 and 2. He issued and discussed a five-page hand-out describing the work activities and report format for Phase 1 (attachment B), and indicated that the goal of the Phase I report is to determine what is done on Phase 2.

At the end of the presentation, Mr. Pavlou led the discussion for each of the three major issues on the agenda which have been identified as the result of comments already made to EPA on the project:

- Data Adequacy
- Risk Assessment
- Site Boundaries

Data Adequacy

Issues raised pertaining to data adequacy and sufficiency included the following points:

- A generally perceived but undefined need for "additional data;"
- Estimated time before NYDSEC's 1990 fish data becomes available to the study;
- Problems relating to demands for seasonal sampling while trying to maintain the 18-month project schedule;
- Relative difference in efforts directed toward the lower vs. the upper Hudson;
- Changes which may have occurred over time relating to existing data already several years old;
- Not sacrificing quality of the data and credibility of the reassessment in the interest of time;
- Development and use of congener-specific data; and
- Availability of extensive and recent data in the Siting Board's hearing files which could potentially contribute to the reassessment.

Mr. Pavlou, Mr. Tomchuk, and Mr. DiBernardo addressed these issues. Responses are summarized as follows:

- 1) It is not the intent of Superfund to perform an endless study, rather to base analyses on enough information to enable EPA to select a remedy. If a need arises to refine the remedy that can be done. EPA does not preclude the need for more data. However, that need must be substantiated and it is premature to attempt to do so prior to the end of Phase 1. In fact, one of the purposes of Phase 1 is to assess the extent and validity of existing data and determine what additional data may be required. There was always the caveat associated with the estimated project schedule that if additional data gathering were determined appropriate, Phase 2 timeframes would be adjusted to accommodate that requirement.
- 2) The reassessment RI/FS addresses remediation of the upper Hudson. The scope of the current project does not include looking at remediation in the lower Hudson. While EPA does not preclude looking further at the lower Hudson in the future, that potential effort is undefined at present. As a natural part of the study of the upper Hudson, data will emerge regarding benefits to and impacts on the lower river.
- 3) Everyone connected with the project is committed to a quality process in support of the ultimate remediation decision. This is a primary reason for creation of the Community Interaction Program, a process which has already been extremely beneficial to the project by facilitating the identification and sharing of relevant information.
- 4) It is intended that some congener-specific data be derived from the planned fish sampling.
- 5) Action items pertaining to NYSDEC's fish data and Siting Board hearing files were identified for the next meeting (see page 5).

Risk Assessment

Discussion of risk assessment centered around the following items:

- Relevance of exposure factor default assumptions to the risk assessment in the upper Hudson;
- Possible data gaps;
- Difference in approach to risk assessment in the lower vs. the upper Hudson.

Responses are summarized as follows:

- 1) EPA will use its guidance and follow the National Contingency Plan (NCP) regarding exposure factor assumptions. In using maximum reasonable exposure scenarios, the worst consequence is that results will be conservative.
- 2) Phase 1 preliminary risk assessment will look at data and qualify any information that is not adequate. Scientists working on the risk assessment are highly qualified.
- 3) It has not been determined what will be done in the lower Hudson, but before doing anything pertaining to risk assessment in the lower Hudson, it is necessary to ensure the validity of the assumptions so that time and effort will not be wasted.

Site Boundaries

Mr. Pavlou and Mr. Tomchuk clarified the site boundaries as

- Beginning at the outfall of Hudson Falls;
- The river itself and in-river sediment, not sediment that may have been deposited onto adjoining land; and
- Not including DOT sites.

Additional Items

Several additional points were raised during the discussion and are included here for the record:

- 1) The project schedule as it currently stands is five months for Phase 1, eight to twelve months for Phase 2, and three to five months for Phase 3, with an 18-month target for completion. The Phase 1 Report is due to EPA May 31, 1991.
- 2) EPA welcomes input, comment, and analyses but will do its own analysis of all the data and draw its own conclusions. The purpose of the various Liaison Groups and Committees is not to vote and/or make decisions but rather to raise issues, exchange information in order to keep the public informed, and provide input for consideration by EPA in its final decision-making process.
- 3) Other possible sources of PCBs will be identified if possible as part of the reassessment process.
- 4) Information from EPA activities at other sites would be fed into this analysis if relevant.

- 5) The Science and Technical Committee (STC) reports to HROC and is available to Liaison Groups if necessary to help on scientific questions. Any questions to be answered or requests for meetings with STC members from Liaison Groups should be forwarded to HROC.
- 6) On May 15, TAMS task leaders will present a preliminary view of the Phase 1 work that will be formally delivered in the Phase 1 Report on May 31, 1991. This presentation will be for Steering Committee, HROC members, and STC members. The purpose of the presentation is to assist these groups in the Phase 1 report review process, which has some time constraints, by providing an early look at available material.

Action Items

- 1) Time frame for availability of NYSDEC 1990 fish study data will be determined by the next HROC meeting.
- 2) The Phase 1 Report will be renamed from "Preliminary Reassessment and Site Characterization" to a title which better reflects the fact that it is an evaluation and summary of existing data, with recommendations for Phase 2.
- 3) TAMS will review the Siting Board hearing files to determine if data in that testimony is relevant and useful for the current reassessment.

Next meeting of HROC

The next meeting of the Hudson River Oversight Committee will be on July 9, 1991, at a site to be announced. Agendas will be distributed prior to the meeting and suggestions for agenda items are welcome.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278

HUDSON RIVER PCBs SUPERFUND SITE

REASSESSMENT RI/FS

OVERSIGHT COMMITTEE

THURSDAY, APRIL 4, 1991

MARIST COLLEGE - POUGHKEEPSIE, NEW YORK

A G E N D A

Welcome & Introduction

George Pavlou, USEPA
Deputy Director,
Emergency and Remedial
Response Division

Introduction of Members

Committee Members

Overview of the Site History
and the Reasons for Conducting
the Reassessment RI/FS

George Pavlou, USEPA

Role of the Hudson
River Oversight Committee

George Pavlou, USEPA

Overview of the Scope of Work
and Phase 1 Work Plan

Al DiBernardo, TAMS
Project Manager

Discussion of Major Issues

- Data Needs & Sufficiency
- Site Boundaries
- Risk Assessments

Committee Members
Chair - George Pavlou

**HUDSON RIVER PCB REASSESSMENT
COMMUNITY INTERACTION PROGRAM**

SCIENCE AND TECHNICAL COMMITTEE MEETING

TUESDAY, APRIL 2, 1991

1:00 P.M.

LATHAM, NEW YORK

MINUTES

The Hudson River PCB Reassessment Science and Technical Committee held its initial meeting on Tuesday, April 2, 1991 in the Holiday Inn in Latham, New York. The meeting began at approximately 1:00 P.M. and was attended by the following:

Douglas Tomchuk - Project Manager, U.S. EPA, Region 2
Ann Rychlenski - Community Relations coordinator, U.S. EPA, Region 2
Albert DiBernardo - TAMS Consultants, Inc. (EPA's Contractor)
Dana E. Low - TAMS Consultants, Inc.
Lyle H. Hixenbaugh - TAMS Consultants, Inc.
Neil Shifrin - Gradient Corporation
Daniel Abramowicz - General Electric Company
Donald Aulenbach - Professor, RPI (formerly)
Richard Bopp - NYSDEC
Brian Bush - NYSDOH
Kenneth Darmer - Hydrologist
John Davis - NY Attorney General's Office
Anne Secord - U.S. Fish & Wildlife
Kenneth Finkelstein - NOAA
Nancy Kim - NYSDOH
Tyler Maddry - Legislative Assistant
George Putnam - SUNY - Albany
G-Yull Rhee - NYSDOH
Francis Reilly - Waterways Experiment Station

In addition, a number of observers attended the meeting, including William Ports, Fred Woodward, Ray Lupe, and Mary Werner, NYSDEC; and Robert Montione, NYSDOH.

The meeting was opened by Douglas Tomchuk, EPA Project Manager, who welcomed the participants and gave an overview of the site history and the reasons for conducting the Reassessment RI/FS. In addition, he stated the role of the Scientific and Technical Committee for the reassessment and its relationship to the Hudson River Oversight Committee.

The various Committee members introduced themselves, indicating their affiliations and specific interests in the project.

Albert DiBernardo, Project Manager for TAMS Consultants, Inc. (EPA's Contractor), provided an overview of the Scope of Work, Phase I Work Plan and the CERCLA RI/FS process. He stated that the work is to be performed in three phases, namely: Phase 1 - Preliminary Reassessment; Phase 2 - Further Sampling and Analysis; Phase 3 - Feasibility Study. Mr. DiBernardo provided a formal presentation of the work to be performed in each phase; copies of the overheads presented at the meeting are attached to these minutes.

A brief synopsis of the comments and questions raised by the members is presented in the following sections.

Date Gathering and Analysis

There was general agreement that sufficient efforts were being made during Phase I to collect and interpret the data collected on the project in previous years. Brian Bush and Richard Bopp offered additional data which had not previously been provided to EPA. In addition, Robert Montione will provide data for contamination north of Baker's Falls and Glens Falls and monitoring data at the remnants.

There was general agreement that there are gaps in the existing data, and that additional data would be necessary to further define PCB distribution and loading as well as the types of PCBs and biological activities occurring in the sediment. There was some concern raised that there may not be sufficient time in the EPA schedule to meet the sampling needs for the project, and that the quality of the data may be jeopardized by the time constraint (EPA schedule calls for completion in August, 1992).

Modeling

There was broad concern over the use of computer models to predict sediment transport and bioaccumulation in fish. It was mentioned that over one million dollars was spent to model the New Bedford Harbor PCB site with only limited success. The key factors in modeling are the relationships between fish, water, and sediments. It was mentioned that empirical statistical models will be developed with the existing data during Phase I. Francis Reilly indicated that the U. S. Army's Waterways Experiment Station has numerous sediment transport models available for use.

General Electric has contracted HydroQual to perform modelling of the Upper Hudson River which is planned to be more extensive than the work proposed in the Phase I Work Plan.

Risk Assessments

It was recommended that an Ecological Assessment of the lower river be performed during Phase I. EPA indicated that this would be performed in a later phase of the project, if warranted.

There was some concern over performing a human health risk assessment for the upper river during Phase I since it will be performed on old data and before the GE-sponsored

liver tissue reread project is complete. There was some feeling that premature reporting of the risks could diminish scientific credibility. EPA indicated that the risk assessment will be qualified to indicate the uncertainties at this time with the risk calculations.

It was recommended that direct contact routes such as dermal and inhalation exposures be considered in the human health assessment.

It was agreed that an overview of previous risk assessment studies would be included in the Phase I report.

Other Issues/Concerns

Other issues and concerns addressed at the meeting included:

- 1) It was mentioned that TAMS Consultants, Inc. plans to use Lamont-Doherty and Richard Bopp to assist in the sediment sampling testing, and interpretation of results. Dr. Bopp indicated that he would make available archived samples for General Electric's use.
- 2) The main focus of this project from a risk assessment and cleanup standpoint will be PCBs. Other chemicals will be considered as appropriate.
- 3) Ciba-Geigy is currently negotiating a Consent Decree to perform an RI/FS at their facility. It is uncertain as to whether their study will consider contaminants in the river sediments.
- 4) Some concern was expressed about not including the NYSDOT dredge spoil sites in this reassessment.
- 5) Daniel Abramowicz elaborated on the in-river aerobic treatment study planned at the H-7 site this summer, and a separate anaerobic in-river study proposed for 1992. He mentioned that there were problems and delays in getting the necessary TSCA permit for the 1991 study. He will provide EPA with a narrative of the proposed 1992 study.
- 6) Administrative - EPA issued a letter to the members providing instructions for submitting meeting expenses to TAMS. EPA, through TAMS, will pay for all reasonable expenses in accordance with the April 1991 travel regulations.

At the completion of the technical discussion, Ms. Ann Rychlenski, EPA's Community Relations Coordinator for the site, conducted elections for Chair and Co-Chair of the Science and Technical Committee. The members voted Dr. Daniel Abramowicz and Dr. Richard Bopp as Chair and Co-Chair, respectively.

Mr. Douglas Tomchuk adjourned the meeting at approximately 4:00 P.M.