

**HUDSON RIVER PCB REASSESSMENT RI/FS
COMMUNITY INTERACTION PROGRAM
JOINT LIAISON GROUP MEETING
JULY 16, 1991 LATHAM, NY**

Ann Rychlenski, USEPA Region 2 Community Relations Coordinator, opened the meeting at 7:14 PM by asking those present to introduce themselves (sign-in sheets are attached).

She apologized that the Phase I Report, originally scheduled for release and discussion by this meeting, was still under review by USEPA in Washington, D.C., and therefore was unavailable as yet. Ms. Rychlenski characterized the evening's meeting as a "touch-base" meeting to see how the Liaison Groups (LG) were doing, to provide a status on the project, and to give LG members an opportunity to get know each other. She mentioned the necessity of the LG members' keeping in touch with each other and with their chairpeople. To assist with that, Ms. Rychlenski will issue a letter to update all LG addresses and telephone numbers.

For the benefit of new LG members, and to clarify any misconceptions resulting from various articles and letters recently printed pertaining to the Reassessment RI/FS, Ms. Rychlenski reviewed the Reassessment project and the Community Interaction Plan. Of particular emphasis was the discussion about the reason for, and conduct of, the Reassessment. Ms. Rychlenski emphasized that the study was being conducted as though "from day one, year one." She reiterated that it is a totally independent study; it includes a wide outreach for whatever information is available, including the popular voice, scientific data, riparian and littoral issues, and research. She stressed again that the Reassessment RI/FS is "not a project about dredging or not dredging."

Doug Tomchuk, USEPA Region 2 Remedial Project Manager, reviewed the Superfund process. The first step at a Superfund site is an investigation into the nature and extent of contamination (Remedial Investigation, or RI). Following that is the Feasibility Study (FS), an evaluation of possible options and recommendation of the most feasible of these alternatives. The selected remedy is announced in what is called a Proposed Plan, which is followed by a 30-day Public Comment Period. The last step is a Record of Decision (ROD) which finalizes the selected alternative. EPA issues a Responsiveness Summary after reviewing all comments, and Remedial Action (RA) commences after the ROD.

Mr. Tomchuk pointed out that the Hudson River PCB Reassessment RI/FS follows the standard process, but has some differences. The project, therefore, is broken down differently. There is a wealth of information already available, which is unusual for an RI. This available information requires considerable analysis, primarily to determine what additional data need to be gathered. Therefore in the case of the Hudson River Reassessment, there are actually three phases to the complete RI/FS process. Phases 1 and 2 of the Reassessment will actually comprise the RI, and Phase 3 will be the FS. Phase 1 consists of an interim characterization including analysis of historical data, some modeling, and some risk assessment information. The Phase 1 Report is now scheduled for release in August. A six-week comment period will follow release of the Phase 1 Report, including public meetings and a public availability session. A sampling plan has

been prepared also, which might possibly enable collection of some data this sampling season. The Scientific and Technical Committee provided input to that plan. Mr. Tomchuk pointed out that some sampling would be done during the six-week comment period to fill in obvious data gaps. Phase 2 of the RI will be the final portion of the site characterization and analysis.

The remainder of the meeting was devoted to questions and comments from the floor, addressed both to Mr. Tomchuk and to Albert DiBernardo, Project Manager from TAMS Consultants, Inc., the contractor on the Hudson River PCB Reassessment RI/FS.

A number of questions centered around including a quantitative risk assessment, even an interim one, in the Phase 1 Report. Darryl Decker, Chairperson of the Government Liaison Group, felt that it might be too sensational to include a risk assessment in a report where there was no remediation alternative mentioned. Mr. Tomchuk explained that no quantitative risk assessment was done in 1984. He also stated that the question of whether or not to include a risk assessment is largely why the Phase 1 Report is not ready to be released. Mr. Tomchuk also added that the EPA Regional Administrator favors including the risk assessment. The issue is under discussion. Other responses to questions concerning the risk assessment in general were:

- EPA will not do a lower Hudson risk assessment at this time;
- The risk assessment will not be an aggregate number, as several exposure pathways are not quantifiable at this time;
- EPA uses standard numbers in risk assessment;
- EPA does not present risk assessments in comparative terms;
- If anything, risk assessments will be conservative and will "err on the side of safety."

In response to other questions, Mr. Tomchuk provided the following information:

- In Phase 1, EPA plans to do side scan and downward sonar surveys, confirm hot spot locations, perform some high resolution sampling, and perform some water sampling (using recently-approved methods to achieve lower detection limits. This plan for Phase 1 has been reviewed with the Science and Technical Committee.
- After the issuance of reports such as the Phase 1 Report, rather than resubmitting revised reports based on public comment, EPA will publish Responsiveness Summaries and incorporate comments as necessary and applicable into the following phases.

- EPA is not overseeing GE's current bioremediation study but will use whatever information is made available from GE. William Reilly, EPA Administrator, is in fact an advocate of bioremediation. Appropriate QA/QC will be done on any data GE submits. Mr. DiBernardo added that practical aspects of implementing a bioremediation solution will also be considered as part of the assessment of bioremediation as a potential remedy.
- EPA is concerned about scour occurring in the river, as this would maximize exposure to the PCBs.
- It is estimated that between 500,000 and 1,000,000 lbs of PCBs were discharged into the Hudson River. There is some evidence of dechlorination, but EPA at this point regulates all PCBs the same, regardless of congener variations.
- The focus of the current Reassessment is PCBs in river sediment and in fish, although some heavy metals may be looked at because of their impact on treatment technologies.
- It is possible to differentiate between chlorine waste treatment effluent and chlorine on PCB molecules in the river by standard analytical techniques.
- Introduction of a control sample of PCBs into the Hudson River is not planned. Mr. Tomchuk characterized that type of activity as research beyond the scope of Superfund and of this RI/FS.

Ann Rychlenski took the floor at the end of the Q&A session to discuss the newsletter-style update currently being planned. It is to be a joint effort of the EPA and LG members, and articles in the newsletter will be welcome from any LG members. The newsletter will be published three to four times per year, depending upon interest and response, and the first deadline for input is August 15, 1991. Articles should be submitted to Ms. Rychlenski at USEPA, 26 Federal Plaza, 9th Floor, New York, NY, 10278. Ms. Rychlenski stressed that there will be no censorship; this newsletter is to be the voice of the LG members. Editing would only be done if space becomes a problem. In those cases, edited text would be reviewed with the author before printing.

In closing, Ms. Rychlenski stated that when the Phase 1 Report is released, copies will go to all Information Repositories and three sets will be sent to each Liaison Group. She will notify all members when the reports have been distributed.

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