

RIVER VOICES

JULY 1994

Produced jointly by the US Environmental Protection Agency Region 2 and the members of the Hudson River PCBs Reassessment RI/FS Liaison Groups.

Schedule Update

by Doug Tomchuk, Remedial Project Manager, Hudson River PCBs Reassessment

EPA has revised its schedule for the Reassessment. While the agency recognizes the potential drawbacks of extending the schedule, additional time is necessary to complete the complex analyses that are being undertaken. These analyses are necessary to understand the fate and transport of PCBs in the Hudson River.

The Phase 2 Report will be released in five (5) volumes on different dates rather than in one massive report. This will give interested parties more of an opportunity to review and comment on the documents. The reports and the tentative release dates are shown in the box, below.

PHASE 2 REPORTS

Data Management NOV 94
(interim database)

Data Evaluation & Interpretation DEC 94
(water column, high resolution coring & geophysical)

Preliminary Model Calibration MAR 95

Ecological Risk Assessment MAY 95

Human Health Risk Assessment MAY 95

PHASE 3 REPORT SEPT 95

(low resolution coring, archived sample analysis & Feasibility Study)

PROPOSED PLAN DEC 95

EPA will take public comment on each of the Phase 2 Reports and hold public meetings (upriver and downriver) after the release of the Human Health Risk Assessment. Public meetings will also be held after the release of the Proposed Plan (which follows the Phase 3 Report). Liaison Group meetings will also be conducted. Comments on Phase 2 that may affect Phase 3 will be addressed as appropriate, although a Responsiveness Summary will not be issued until the Record of Decision. Please note that the Phase 3 Report will be released several months prior to the Proposed Plan in order to allow the public the most time possible to review the information within the Phase 3 Report before EPA proposes a remedy.

From The Editor

River Voices is an update produced jointly by the U.S. EPA and the members of the four Liaison Groups established under EPA's Community Interaction Program for the Hudson River PCBs Reassessment.

Articles appearing in **River Voices** are the sole opinion of the author whose name appears in the byline, and do not represent or reflect the opinion or policies of EPA. In addition, articles authored by Liaison Group members represent only the opinion of the author, and not the Liaison Group or membership as a whole.

Contributed articles published in **River Voices** appear as originally written, and any editing has been done for space consideration only, and with the prior consent of the author.

EPA has not estimated the date for the signing of a Record of Decision because it is dependent upon the volume of comments received on the Proposed Plan, and the time it takes to respond to and address those comments.



Agricultural Liaison Chair Tom Borden and his family on their farm in Schaghticoke.



REPORT NAME:	
REVIEWER:	
ORGANIZATION:	

[illegible]

Getting The Most Out Of Your Comments

by Ann Rychlenski, Editor, River Voices

A recurring theme in this edition of **River Voices** is public participation; and as we journey further into Phase 2 of the Reassessment that same theme is going to be a constant echo, reminding us all of the importance of public comment.

As you can see by Doug Tomchuk's article on page 1, the Phase 2 Report will be published in 5 separate volumes, coming out over a period of approximately 7 months. These volumes will deal with highly technical and complex information which will ultimately help form the foundation upon which our remedial decision is made. Public comment is an integral component to the community's role in the Superfund process, and can take the form of written comments as well as verbal comment taken down at public meetings.

Following are a few tips on how to get the best response to your written comments. Please note that these "tips" do not in any way seek to lead the public towards or away from particular areas of commentary - they are being published simply to serve as guide posts to those who have never given written comment before or who seek to refine their methods.

- 1) Be specific. Whenever possible, cite the volume, page and paragraph of the document on which your comment is based.
- 2) Do your comments in bullet fashion, so that they stand on their own in a clear and concise manner.
- 3) Keep related comments in groups. Example: if you are commenting on a number of separate issues such as results of water column studies, fish tissue analysis, and congener analysis of archived cores - confine comments to their own subject category, instead of "being all over the board."
- 4) To the greatest extent, please try not to mix technical comments or questions in with the editorial portions of your correspondence. Of course, you are free to provide us with your policy/editorial views, but we ask that they be presented in a format separate from specific technical issues.

I hope these guidelines are of some help to you as you work your way through the Phase 2 Report. We are always open to new and better ways of doing things. On the reverse of this article is a comment form which we have put together in the hopes that it will assist you in organizing your comments and questions. In addition, if any of our readers have helpful hints on the public comment front, please send them on to me. If we receive enough of them, a follow-up to this column containing the additional commenting tips will be put together and sent out - so please share your ideas with your neighbors.

Touching Base Along The River

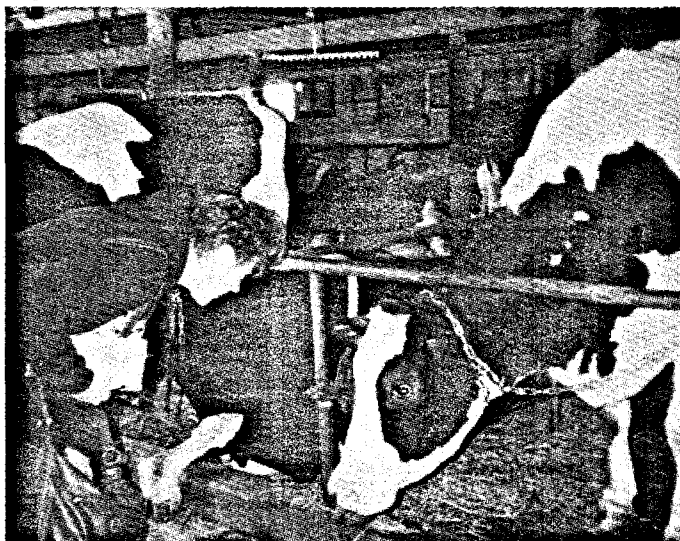
by Ann Rychlenski, Editor, River Voices

During the months of May and June, 1994, Karen Coghlan of TAMS Consultants, Inc. (EPA's contractor for the Hudson River PCBs Reassessment) and I traveled the Hudson River Valley, from Hudson Falls to Millbrook, New York, visiting with members of the public who have been active in the Reassessment and the PCB issue in general.

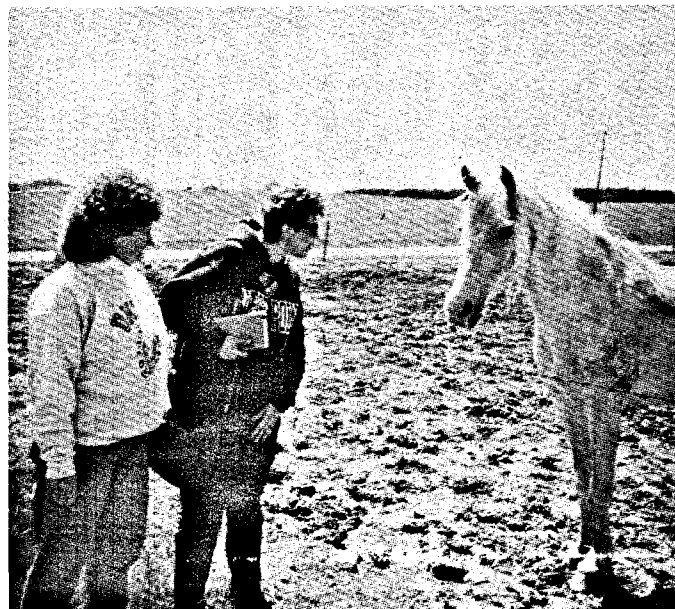
This "touch base" trip was undertaken in order to prepare the road for the activities that will be an important part of the Phase 2 public participation process. Karen and I spoke with Liaison Group Chairpersons as well as representatives of county Environmental Management Councils (EMCs), farmers and fishermen - trying to find the most effective ways of communicating the vast array of information that will be contained in the Phase 2 Report.

We got lots of helpful feedback, much of which you see reflected in the articles featured in this edition of River Voices. For instance, Paul McDowell of the Agricultural Liaison Group and New York State Farm Bureau suggested that we run a spot on public comment; and Carl Deppe felt that we should begin the public comment period with release of the first Phase 2 document, as well as share written comments received from Liaison Group participants with the rest of the membership as those comments come in.

In addition to creative ideas on enhancing the public's role in the project, we received offers of assistance at just about every corner turned. Local EMCs from Saratoga to Dutchess Counties, and many in between, expressed their willingness to host and help coordinate meetings, disseminate information via their groups, and get public comment received at EMC meetings passed on to EPA. These offers were echoed by environmental organizations that we met with as well.



Ann and friend at the Pulver farm. Ann wants everyone to know that the cow is the one on the right. She's Tammy, an 1800-lb. Tri-County Grand Champion Holstein.



The view from Merrilyn Pulver's farm in Ft. Edward (complete with daughter Tina's beautiful Arabian horse). Merrilyn is one of the Agricultural Liaison Group's Co-Chairs.

We would like to thank all those who found the time to meet with us and share their thoughts and insights on the Reassessment; and a very special thanks to all of you who so graciously received us in your homes. We hope to come up and touch base again before the Phase 2 Report activities go into full swing later this year. We also want to thank Fran Dunwell, DEC Hudson River Coordinator, and Barbara Kendall, Dutchess County EMC Director, for sharing their mailing list databases with us.

Hudson River Site Review and Update Available to Public

The New York State Department of Health (NYSDOH), under a cooperative agreement with the Agency for Toxic Substances and Disease Registry (ATSDR), has prepared a Site Review and Update (SRU) for the Hudson River PCB site (the Hudson River between Hudson Falls in Washington County and Troy in Rensselaer County). The purpose of the SRU is to evaluate the current conditions of the site and help determine if additional follow-up public health actions is needed (i.e. public health assessments or health consultations). The SRU is available for review at the Hudson River Reassessment RI/FS Information Repositories. For a copy of the document, please contact the NYSDOH at the toll-free number 1-800-458-1158 and ask for the operator; a copy will be sent to you.

Note from the editor: A copy of the above referenced document will be sent to the Liaison Group Chairs and Co-Chairs as soon as they are received by EPA.

An Open Letter for Public Involvement

by Darryl L. Decker, Chair, Governmental Liaison Group

Finally, following thousands of man-hours of sampling and analyzing data from the Hudson River sediments, water column, fish and adjacent areas, the Phase 2 Report is about to be released.

This multi-volume report, which will supplement existing information, will in all probability be a mind boggling plethora of techno-babble; a digest of exponential numbers expressed in negative dimensions; an attempt to consider the relevance of multi-phase partitioning; volatilization, fugacity, and even the commonly known variations of aroclors, and congener-specificity.

There will be charts for those of us who know that a diagram is worth a thousand words, and a thousand words for those of us who don't. And, lots of arrows going in all directions. Yes, lots of arrows lest someone should be able to make any sense of it all. And graphs galore to ensure that the "connect the dots" specialists have overtime.

Truly, this massive production will not be particularly entertaining reading, but, it is absolutely necessary for everyone interested in this RI/FS to thoroughly review this Phase 2 Report in its entirety. There will likely be several meetings held to explain the material and answer questions and, hopefully, these will be held both upriver and down.

We must all recognize that the information presented, once accepted and added to the existing data, WILL form the basis for Phase 3, the Feasibility Study and development of the Proposed Plan of remediation.

From the beginning of this reassessment in 1990, the Community Interaction Program has promoted public interest in this project. Now, at this juncture, everyone interested MUST actively participate in the process. This report may not be exciting or fun reading, and it won't be easy to comprehend, but we must TRY to understand its contents and its implications.

Do you believe the river is recovering naturally? Do you believe some active remediation is necessary? Do you support a particular remedial action? Before you finalize your answers, review the Phase 2 Report, and then make an informed determination. Make your opinion known to Liaison Group Chairpeople and attend the public meetings.

The Environmental Protection Agency has assured the Liaison Groups that Community Acceptance is one of the major criteria when considering their decision for this project. It is particularly important, therefore, that community members make their concerns known during the public comment period.

And finally, let's all recognize that the ultimate decision must acknowledge compromise among the varied interests. Please, get involved now! Future generations will thank you for your efforts.



Ann Rychlenski at an early morning meeting with Governmental Liaison Group Chair Darryl Decker.

Bringing More GE PCBs To Light

by Cara Lee, Environmental Director, Scenic Hudson

The problem of PCBs in the Hudson River - a story which came to the public's attention twenty four years ago with the discovery of elevated levels of PCBs in fish - has taken many twists and turns as government agencies have struggled to come to terms with the massive PCB pollution discharged into the River over a thirty-year period by General Electric.

The presence of PCBs in the Hudson is responsible for complete closure of the upper Hudson to fishing, closure of the valuable striped bass fishery, an "eat none" health advisory on seventeen species in the estuary for women and children, and an estimated economic loss in New York State of approximately \$40 million annually.

The new twist is that in addition to the PCB-fouled riverbed sediments - known as the "hot spots" and the focus of EPA's Reassessment - it has been discovered that more General Electric PCBs are still being released into the Hudson River. While it is now believed this may have been the case throughout the 1980s, the severity of these releases has come to light over the last two years.

The "Discovery"

Elevated PCB levels in water column samples in the Bakers Falls area in 1991 were followed in 1992 by measurements of levels in fish flesh that showed an astounding 300% increase of PCBs. The influx of PCBs was quickly traced to the General

Continued on page 4

GE PCBs *continued from page 3*

Electric Hudson Falls Plant, situated on an eighteen acre site on the east bank of the Hudson, upstream of the hot spots being studied by EPA. The plant, situated on a bluff over the river and adjacent to Baker's Falls, manufactured capacitors from 1952 to 1977. The site was also used for storage of waste chemicals. In addition, there is an abandoned mill building on the site with raceways along the river's shore.

First ordered by the New York State Department of Environmental Conservation (DEC) to investigate contamination on the site in 1986, GE's initial findings resulted in the site being designated by New York State as a Class 2 Superfund site in 1987. A Class 2 site is one that "left unremediated, poses a significant threat to the environment and human health."

Studies conducted in 1993 identified pockets of extremely contaminated groundwater, "seeps" oozing an oily substance ranging from hundreds of parts per million to 90% pure PCBs near an old PCB discharge pipe, and literally tons of heavily contaminated sediments in the raceways of the old mill building.

Studies spurred by the unexpected high levels of PCBs in water and fish levels, found samples of oily liquid taken from bedrock seeps inside the mill building and adjacent to the river to be about 72% PCBs, and that deterioration of the mill structure was responsible for significant quantities of PCBs entering the river. An underwater inspection of the Hudson also turned up seven capacitors that are suspected of having leaked PCBs into the river as well. In a news release in July 1993, [former] DEC Commissioner Jorling stated that "the evidence is clear: the Hudson Falls site is a significant source of the PCBs that continue to impact the Hudson River..."

The next news break came a few months later when DEC announced that results of soil and water samples taken from an area near the discharge outfall of GE's Fort Edward plant also showed contamination - ranging from 148 to 5,571 ppm in sediments along the shoreline - making this site an additional culprit in the on-going contamination of the river.

Actions Taken

GE removed 100 cubic yards of highly PCB-contaminated sludge from under the plant in 1989, and in July 1993, after prolonged negotiations, DEC and GE signed a consent order requiring GE to perform additional investigations and feasibility studies at the Hudson Falls site. As part of this consent order, GE agreed to remove contaminated sediments from the old mill raceways and collect PCB-contaminated seepage from all the migration pathways from the plant to the river, such as pipes and bedrock fissures, as an interim measure.

Unfortunately, the order only extended to removal of some of the contaminated sediments on the site and specifically excluded remediation of any PCBs that had already reached the river. A second consent order signed in October required GE to remove about 3,000 cubic yards of contaminated sediments [from the raceway in the Allen Mills building], at a cost of \$1.4 million.

From a Fisherman

by Jon Powell

For almost 20 years, I have been involved with the issue of PCBs in the Hudson River. My interest started as a college student when my chemistry professor made PCBs a class project. Our studies encompassed the many chemical makeups of PCBs and the various types of health problems associated with PCB contamination in a human population.

After college I moved on to other things. But again, over the last ten years my interest in PCBs resurfaced. One reason is that I am now an educator myself and have a great interest in the river. Much of what I teach deals with the river and its ecology. The second reason is I derive part of my income from commercial fishing on the river.

Over the last few years, as the Reassessment process has gone on, I have been to several public hearings and have testified at most of them. One point that keeps coming forth is the great financial burden and detriment to the dairy businesses up river. These farmers fear the removal of PCBs from the river would contaminate lands used in farming communities. It has also been stated at the same time that there has been no socioeconomic impact to downriver communities and families who used to derive much of their livelihood from commercial fishing in the river. It is time to look at what has been lost because of the ban and stigma attached to PCB-tainted fish and what could be gained by a restored Hudson River fishery.

Fishing is a profession that requires a lot of on-the-job learning. Every day on the water adds to the knowledge required to be a "riverman." Being a riverman is a lifestyle and vocation using a river or body of water just as the Maine lobstermen and the Chesapeake Bay oystermen do; in fact, even as the farmer uses his land for crops and grazing. For the most part, this "traditional" or historic profession on our Hudson River is dying. The pride of an honest living and the passage of traditions and knowledge on to a son or daughter to be passed on again is vanishing before our very eyes.

I often ask myself two questions. The first is: Is there really a difference between a fisherman and a farmer? The basic things that make us the same are self-reliance, independence, pride and

Continued on page 6

In May 1994, the DEC and the NYS Attorney General's office issued a "notice of violation" against GE for the releases from the Hudson Falls and Ft. Edward sites, indicting the legal basis for further legal actions. GE and NY State signed a settlement in 1977 barring NY State from further legal action against GE for PCB contamination in the river, in return for a pledge to stop PCB discharges. The notice of violation served on GE by NY State for the ongoing releases are an indicator that the seventeen year old settlement is falling apart due to GE's continued pollution of the Hudson.

Continued on page 7

It's Here! The 1994 International Hazardous Materials Spills Conference

EPA Headquarters has asked the editor of *River Voices* to inform the public of the following:

Buffalo, NY, is hosting the 1994 International Hazardous Materials Spills Conference from October 31 through November 3, 1994, at the Hyatt Regency Hotel and Convention Center. Communities, state and local governments, industry and international guests will have the opportunity to learn more about how to prevent, prepare for, and respond to hazardous materials accidents at this important conference.

In the 10 years since the Bophal tragedy, significant strides have been made in hazardous materials safety. These positive changes resulted from proactive partnerships formed by all the vested interest groups in the private, public and international arenas. The theme for this year's conference is "Partnerships for Hazardous Materials Safety."

The conference sponsors include the National Response Team, The National Governor's Association, The Chemical Manufacturers Association and the American Institute of Chemical Engineers, in cooperation with the Canadian Chemical Producers Association and the New York State Emergency Response Commission.

If your work requires knowledge of hazardous materials safety, this is an important conference.

Registration materials will be available in the near future. To ensure that you are on the mailing list, contact Angela Moody (703) 442-9824. If you have questions regarding the conference, contact Sarah Bauer (202) 260-8247.

PCBs & Other Industrial Chemicals Linked To New Health Risks

by Bridget Barclay, Hudson River Sloop Clearwater

Concerns are growing that chlorinated organics (such as PCBs) and other chemicals with the ability to mimic natural hormones are causing cancer in adults and adverse health and reproductive effects in the offspring of both humans and wildlife.

According to a recent article in an industry publication, **Chemical and Engineering News** (April, 1993), "An increasingly prominent element of the argument against these chemicals is that many of these compounds cause non-cancer health effects - endocrine, immune and neurological problems - principally in the offspring of the exposed humans and wildlife, and seem to create these problems at extremely low exposure levels."

Recent scientific findings that support these concerns are widespread and compelling:

- Boys in Taiwan exposed to PCBs while in their mothers' wombs (their mothers had eaten rice oil contaminated with PCBs) developed smaller penises as they matured, according to a study reported in *Scientific American*.

- 115 of the Taiwanese children were evaluated 6 years after their mothers were exposed to PCBs; they were less developed than a control group of children on 32 of 33 different measures of physical and mental abilities.

- Endometriosis, a painful disease that affects women in their reproductive years, frequently leading to infertility, was formerly a very rare condition but now affects 6 to 9 million women in the U.S. Lab studies with Rhesus monkeys have shown a link between exposure to PCBs and development of endometriosis. A 1992 study revealed that endometriosis is linked with exposure to PCBs in humans.

- Since the 1940s the incidence of female breast cancer in Western Europe and the U.S. has risen significantly. Today, the chances of a woman developing breast cancer in her lifetime are 1 in 9.

- Over the same period of time sperm counts in men worldwide have fallen about 50%, the incidence of testicular cancer has tripled and that of prostate cancer has doubled. There also appears to be a significant increase in the occurrence of birth defects of the male reproductive system.

- Female common terns nesting near a PCB-contaminated waste site in New Bedford, Massachusetts are sharing nests and exhibiting other abnormal reproductive behaviors. Research has also shown a high incidence of abnormalities in the embryos taken from these nests. Similar findings are reported for studies of shorebirds along the Great Lakes.

- Since 1987, communities of marine mammals such as dolphin, seal and whale have experienced wide-scale die-offs around the world. Some researchers believe that exposure to organochlorines weakens their immune systems, making them more susceptible to infectious disease. In some cases, this has been supported by findings of increased levels of PCBs in the tissues of dead animals.

- Studies in North Carolina found a correlation between a mother's exposure to PCBs and poor muscle tone at birth weight and poor muscle coordination in their offspring at 6 and 12 months.

- In Michigan, children born to women who ate as few as two to three meals per month of Lake Michigan fish (contaminated with PCBs) preceding their pregnancies were smaller than average at birth and had behavioral, motor and learning problems. Negative growth and behavior effects were still observable when the children were tested again at age 4.

According to a second article in **Chemical and Engineering News** (January 31, 1994), "Some scientists say at least part of the reason for the increase in these conditions may be man-made chemicals introduced to the environment since 1940 that mimic or block the action of the natural hormone estrogen. Such chemicals may act on the adult human or animal and cause cancer or endometriosis. The consequence may even be more widespread and devastating when estrogen mimics accumulate in the mother and are then transferred to the egg or the fetus, disrupting the hormone balance of the developing offspring and

Continued on page 6

Fisherman *continued from page 4*

hard work, and the relationships that develop between family and friends who hold the same values dear. But this is all but lost on this river. Fewer and fewer people work the river every year and fewer families carry on businesses that center around the river fishery.

Sons and daughters have turned their backs on their fathers' and grandfathers' once lucrative businesses in favor of "real" work away from the river in a more secure economic environment. In this day and age of high-tech, lost family values and the lost traditions of passing skills and knowledge from generation to generation, how can we afford to lose yet another traditional lifestyle?

Yeah, I hear the skeptics laughing now saying, "You people are antiques, outdated, and not needed to supply a commodity that mass production can provide -- FISH." To make it very simple, we all have to make a living, and people have to eat, and when the fishermen fish, people eat, and the fishermen get paid. It is as simple as that!

The second questions I ask is: Why New York State is allowing an honest and historic way of life to die out? The ambiance for which people stream to the Chesapeake, to Maine, to Cape Cod, to Rhode Island to be a part of is almost gone here. The docks, the "aroma," the history and the lifestyle that is a part of other states' "calling cards" are slipping through our fingers. With the rebirth and interest in the Hudson River, we have to save what through the years has been an integral part of this river.

The preservation of a way of life is as important as the economic impact felt by all fishermen past and present. Restrictions and regulations due to PCB contamination and the impact of unregulated "off-shore" fisheries have affected everyone's income. Were it not for PCB contamination, several species of fish would be legal to catch and sell for consumer consumption. Here is a list of some of the species and price per pound which are readily available in the Hudson River:

Striped Bass - \$2.00+/lb.; American Eel - \$2.00+/lb.;
White Perch - \$1.25+/lb.; Catfish/Bullheads - \$1.50/lb.;
Carp - \$1.50-2.00/lb.

How much could be made? For example, let us look at American eels. There is a great number of eels in the Hudson River with a nearly endless market, both domestic and abroad. Using various fishing techniques, it would be fairly easy to catch 500-1,000 pounds in one week. With some simple math, that relates to \$1,000-2,000 per week. With a fairly lengthy season, \$30,000-60,000 a year could be made just on eels alone. If you add in the shad and sturgeon which we are allowed to commercially fish today, along with striped bass, a comfortable living could be made from the river.

We have the potential, if managed properly, to have the finest small boat fishery in the country. We have spent a great deal of time protecting and cleaning up many environmental problems along the river. In doing so, we have created a strong,

viable river habitat system which is in strong contrast to many of the other river systems which have been dammed and polluted to the point of total destruction of aquatic life. For example, the Columbia River on the west coast and the lost salmon fishery due to dams.

Considering the large number of saleable species, this fishery has the potential with money derived from fishing and its associated industries to rival the Chesapeake Bay in economic impact on this state. With these facts, how can anyone say that PCBs have had no impact on this state? With these facts, how can anyone say that PCBs have had no economic effect on downriver communities? Wake up! Do your math and see the dollar signs! All this is a sad commentary on our society and where we are headed. The big question is: Is this fishery worth saving? My answer is an unequivocal YES! The next question is "How will it be saved, before the fisherman are all gone?" The answer for that is a little harder, but cleaning the PCBs out of the river would be a nice start!

Risks *continued from page 5*

causing reproductive abnormalities or changes that set the stage for cancer in adulthood."

According to Dr. Theo Colburn of the World Wildlife Fund, at least 45 widely-used industrial chemicals and pesticides have been shown to disrupt the endocrine system in fish, birds, and mammals, including humans. Examples of estrogen mimics are DDT, kepone, dieldrin (pesticides) and some PCBs. These chemicals all tend to be persistent and prone to accumulate in fatty tissues of animals and humans over their full lifetime. Most can cross the placental barrier and pass from the mother to the developing fetus.

Given the growing evidence of widespread and potentially devastating health effects being linked to persistent, bioaccumulative chemicals, it is clear that more needs to be done to prevent ongoing exposures to wildlife and humans. And it can be done.

The International Joint Commission (IJC), a governmental agency of representatives from Canada and the U.S. which is responsible for restoring the environmental quality in the Great Lakes, is calling for the phase-out of all persistent toxic substances (including PCBs) from the Great Lakes, a ban on the manufacture and use of chlorine, and a reversal of the policy that assumes chemicals are innocent until proven guilty. IJC's 7th Annual Report states in part, "We do not know what all of the effects of human exposure will be over many years...For the Commission, however, there is sufficient evidence now to infer a real risk of serious impacts in humans."

The same logic applied here at home would dictate a prompt and thorough clean-up of the PCBs in the Hudson River.

Information used in this article came from articles in Chemical and Engineering News (cited) and several issues of the Environmental Research Foundation's "Hazardous Waste News." Reprints of the original articles are available by contacting Clearwater's Environmental Action Program.

GE PCBs *continued from page 4*

The Results

While the Hudson Falls and Ft. Edward sites keep making the news, it is because more PCBs continue to be found, not because the problem is resolved. In other words, results to date have been disappointing despite some remedial actions on GE's part. Despite the agreements that have been signed and the removal of some contamination, PCBs continue to seep out of the Hudson Falls and Ft. Edward sites, further polluting the Hudson River.

The "newest news" at the Hudson Falls site is that more seeps of highly concentrated PCB oil were found by GE's consultants on June 22, 1994 in the river bottom below and next to the mill raceway. At about the same time PCB contamination was found in private drinking water wells at homes near the Ft. Edward plant. GE was immediately directed by the DEC and the NYS Attorney General's office to submit work plans to abate the newly discovered seeps, to divert water away from the contaminated area, to collect and treat water and oils, to step up water and fish monitoring activities and to provide homeowners with safe water.

Despite the promises, studies and agreements, the PCB problems at Hudson Falls and Ft. Edward are far from over and continue to be significant sources of pollution. Given the pervasiveness of PCBs on the site, it will be technically challenging to adequately remove them and companion toxics. Yet, without a comprehensive cleanup of this heavily contaminated site, it is clear that it will continue to hemorrhage PCBs to the river. Given that GE has been "investigating" this time-bomb site since the 1980s, it is appalling that it took disaster to spur any clean-up action.

Hudson Falls, Ft. Edward and the Reassessment

Soon after the PCB sources were found at Hudson Falls, GE suggested that the EPA Reassessment should be stopped. It was GE's contention that remediation of the Hudson Falls site would prove to be so effective in reducing PCB levels throughout the river that it would not be necessary to remediate the hot-spots. This is a faulty and self-serving line of reasoning.

No one but GE has characterized this as an "either/or" situation. In fact, both the State of NY and EPA recognize the importance of tackling Hudson River PCBs in a comprehensive fashion as the only way to eliminate flow of PCBs into the rest of the river system. That means stopping the Hudson Falls/Ft. Edward discharges into the river and completing the analysis of the in-river PCB contaminated sediments in preparation for clean-up.

According to both EPA and GE, it is possible to differentiate between the PCBs from riverbed sediments and those from the Hudson Falls/Ft. Edward sites, so there should be little confusion about that fact that all contribute to the river's pollution and all should be subject to clean-up.

DEC and EPA have invested considerable time, money and expertise into understanding Hudson River PCBs - the inci-

dence at Hudson Falls and Ft. Edward do not make that knowledge moot. Nor does urgency to act immediately on the newly discovered discharges diminish the need to complete EPA's analysis of the "hot-spot" PCBs which continually add to the Hudson's PCB burden.

Region 2 Welcomes New Regional Administrator

U.S. EPA Region 2 is pleased to welcome Jeanne M. Fox as the agency's new Regional Administrator. Ms. Fox joined Region 2 in April of 1994.

Prior to being named EPA Regional Administrator, Ms. Fox served seven months as commissioner of the New Jersey Department of Environmental Protection and Energy (NJDEPE). She had previously served for two and one half years as deputy commissioner of the Department. She was also the New Jersey Commissioner on the federal/tri-state Delaware River Basin Commission, and served on a number of committees, including the Policy Committees of the federal Delaware River and New York Harbor Estuary Programs, the State-EPA Operations Committee, and the Superfund Policy Forum.

Ms. Fox is a graduate of Douglass College at Rutgers, The State University of New Jersey (1975) and Rutgers Law School at Camden (1979), and is a member of the Rutgers Board of Trustees and the Douglass Society.

We hope you will join us in welcoming Ms. Fox to Region 2.

If you have any comments to an article appearing in **River Voices**, are interested in joining one of the four Liaison Groups, are interested in attending one of our meetings as an observer, or if you just want to know a little more about this program, contact:

Ann Rychlenski
Community Relations Coordinator
USEPA Region II
26 Federal Plaza
New York, New York 10278
(212) 264-7214

**HUDSON RIVER PCBs REASSESSMENT
REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS)
INFORMATION REPOSITORY LOCATIONS**

Adriance Memorial Library
93 Market Street
Poughkeepsie, NY 12601

Catskill Public Library
1 Franklin Street
Catskill, NY 12414

County Clerk's Office
Washington County Office Building
Upper Broadway
Fort Edward, NY 12828

Crandall Library
City Park
Glens Fall, NY 12801

Croton Free Library
171 Cleveland Drive
Croton-on-Hudson, NY 10520

Fort Edward Town Clerk's Office
Fort Edward Town Hall
118 Broadway
Fort Edward, NY 12828

NYS Department of Environmental
Conservation (NYSDEC), Region 3
21 South Putt Corners Road
New Paltz, NY 12561

NYSDEC
Region 4
2176 Guilderland Avenue
Schenectady, NY 12406

NYSDEC
Region 5
Route 86
Ray Brook, NY 12977

NYSDEC
Division of Hazardous Waste Remediation
50 Wolf Road
Albany, NY 12233

NYSDEC
SUNY Campus
Building 40
Stony Brook, NY 11790

New York State Library
CEC Empire State Plaza
Albany, NY 12230

Saratoga Springs Public Library
320 Broadway
Saratoga Springs, NY 12866

Troy Public Library
100 Second Street
Troy, NY 12180

US Environmental Protection Agency
Superfund Records Center
26 Federal Plaza - 29th Floor
New York, NY 10278

White Plains Public Library
100 Martine Avenue
White Plains, NY 12601

U.S. Environmental Protection Agency, Region 2
26 Federal Plaza
New York, NY 10278

**PLACE
POSTAGE
HERE**

