

Memorandum

To: TAMS Consultants
From: Tina Souza, Gradient Corporation
Subject: Personal Communication with R. Montione, H. Rudnick

Date: December 21, 2001

This memo will serve to document the personal communications that occurred with R. Montione at the New York State Department of Health (NYSDOH) in 2000, and H. Rudnick at the New York State Department of Agriculture and Markets (NYSDA&M) in 1999, for the Hudson River PCB Superfund Site project. The two phone conversations were between EPA Region II and NYSDOH, and EPA Region II and NYSDA&M, to discuss New York State's sampling of PCBs in cow's milk. Because phone logs of these conversations cannot be located, the content of the phone conversations are summarized below.

I attempted to contact Rudnick at NYSDA&M (518-457-5731) and was told that Dr. Rudnick had retired a couple years ago. Mr. Montione was with NYSDOH in 2000 but has since transferred to TAMS Consultants. I contacted him on Wednesday, December 19, 2001 at the TAMS New York office (518-438-3833). The following information is what he provided:

- The question re. PCBs in agricultural products arose in a conversation about the Hudson River between Montione and EPA Region II. Montione, who was at NYSDOH at the time, had contacts at NYSDA&M, so he contacted them and was put in touch with Rudnick.
- Rudnick was head of laboratories at the time and spoke to Montione about the department's standard agricultural products sampling program. He told Montione that data from this sampling program were only available on paper (*i.e.*, not in an electronic database) and were filed alphabetically by farm name. Thus, Rudnick told Montione that going through these paper copies would be very labor intensive, so he could not look up those data from the Hudson River area specifically.
- However, Rudnick pointed out that PCBs had never been detected in cow's milk anywhere in New York State. The detection limit was 0.6 ppm (lipid normalized) and was approximately half of the FDA standard. With NYSDA&M's rotating sampling plan, Rudnick stated that they would certainly have sampled dairy farms in the Hudson River area.
- Montione conveyed this information to EPA Region II. EPA Region II then also contacted Rudnick to obtain this information directly from him. The conversation between EPA Region II and Rudnick took place in 1999.
- EPA Region II later spoke again with Montione to confirm that the cow milk samples represented individual farms, not composite samples of milk from more than one farm. This conversation took place in 2000.