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Dear Mike,

Below is my response to General Electric's comments on Volume 2E Baseline Ecological Risk Assessment, Hudson River PCBs Reassessment RI/FS.

1. GE suggests that I developed 'threshold values' in my review on the effects of PCBs on reproduction and development in fish. This is incorrect. My review demonstrated that a RANGE of PCB concentrations from 5.0 ppm in whole body of larvae reduces larval survival and from 25-75 ppm in the livers (equivalent to 25-75 ppm in whole body of adults, and half that in fillets) interferes with proper function of the reproductive system. GE refers to 25 ppm as a threshold value. This is NOT a threshold value, and was not developed as such. The value is the low end of the range of A1254 concentrations reported to have reproductive or developmental effects, they are not necessarily the lowest effective concentrations – which is an important distinction when developing threshold values.

In addition, when comparing these values to EPA's TRVs they do not consider that in many cases because of interspecies differences EPA use a 10X-uncertainty factor because they are developing TRVs. The goal of my review was to summarize the available data, NOT to come up with threshold numbers or TRVs. Had that been the case then it is possible that some sort of uncertainty factor may be applied resulting in lower effective concentrations.

Finally, the TRVs were based on adults and offspring (hatchability). The range developed in my report did include reduced survival in larvae (5 ppm) which was not discussed by GE.

2. GE refers to my report and quotes my conclusion that '...it is currently not possible to evaluate the risk to Hudson River fish larvae from exposure to co-planar PCBs using the TEQ method.' The quote referred to the NOAA data set. I concluded that the TEQ analyses may UNDERestimate the TEQ for Hudson River fish because not all of the Ah-active congeners were analyzed, in ADDITION to the potential for large interspecies differences. GE only refers to the problems of interspecies differences.

(original signed)

Emily Monosson, Ph. D.