

March 6, 1991

COMMENTS ON: PHASE 1 WORK PLAN, WORK ASSIGNMENT 013-2N84
FROM: Celia Murray, Concerned Citizens for the
Environment, Citizen Liason Group

Altogether the outline is very complete, if anything overly ambitious for the time frame. I'd like to say that I am very pleased with the entire program thus far in terms of its accessibility to the public and its breadth. CCE has the following questions about the Phase I plan, along with a suggestion to increase the overall live data capture throughout the project. We hope that the Phase II and III work plans, when the bioremediation options will be explored, are as comprehensive in all their parts.

- 1) We think there may be a way to give recreational fishermen their sport back AND have a no cost means for DEC to gather fresh live data. We suggest that a catch and release program be initiated for the Upper Hudson, encouraging the fishermen to bring possible PCB-affected fish to one of several designated sites for testing. The fish could be checked for PCB levels and their catch point noted.
- 2) Regarding the health risk assessment, will using normal volatilization represent the maximum inhalation exposure level or would the risk be more conservatively evaluated accounting for exposure downwind of industrial facilities evaporating river water into the air from cooling towers, etc.? We feel that the standard has to be set by the maximum likely exposure.
- 3) Will the Phase I study, in accounting for other chemicals as per page 2-3, account for the increased chlorine levels or various biocides that may soon be used to address the problem of zebra mussels, as they lock down through the Hudson?
- 4) Would the islands just south of the Federal Dam, in Troy, serve as useful sites to check the accumulation of PCB's from over the dam in sediment, vegetation, and waterfowl population?
- 5) What are the procedures for "as required" press releases in terms of which newspapers will be notified, how broad an area they would cover, etc.?

CCE is concerned about the PCB's in the Hudson because of their likely transmission throughout the area of industrial projects such as cogeneration plants, that use water for cooling purposes, etc. I am personally concerned because I live in Troy, and the attractiveness of the river for recreational use is very important to our city's future economy. Obviously the Pcb's cast a shadow on that.