

EPA HUDSON RIVER PCB REASSESSMENT RI/FS

Citizen Liaison Committee

Initial Report on Phase I to the CIP Steering Committee

Tuesday March 12, 1991

To begin our look at the EPA HR Reassessment, the Citizen Liaison Committee used a questionnaire to poll its committee members and a meeting Tuesday March 5, to reach its conclusions. Attached you find copies of these questionnaires and other comments from members and the general public.

Our concerns begin with the uses and users of the river. Overwhelmingly, the issues were recreational, ie., fishing, boating and swimming; the rivers value as a natural resource, ie., its beauty and wildlife; its use as a water supply now and in the future to local municipalities; the river as it relates to area tourism; and the rich history of the river from the time the Iroquois Indians navigated the river through the American Revolution and Battle of Saratoga to the booming days of the Champlain Canal in the 1880's and early 1990's. All of these concerns are either directly or indirectly effected by the PCBs and the current state of the river. One case is the fishing ban between the Troy Dam and Ft. Edward which prohibits even a catch and release program, or just that feeling that people have whether they're from this area or not, that the PCBs make the river "dirty" and "bad", and make our area uninviting.

In reviewing the Phase I Work Plan, Preliminary Reassessment of Jan., 1991, we find it overall to be complete and comprehensive. We do though, have the following questions:

1. How will the EPA determine the quality and usefulness of the various data collected in Phase I (Re: Item B page 2-2, what other protocols besides USEPA CLP, if any will be used to evaluate data quality?) Are there any chemists or PCB experts on, or available to the team? Will the PCB Advisory Committee assist the team?
2. What steps will you take to be sure that you learn of all ongoing and proposed PCB research?
3. Can you find out if anyone (e.g. US Army Corps) has done an hydraulic model of the river?
4. How will Phase I address other possible contaminants in the river besides PCB?
5. In Sec. 2.1 D concerning the inventory on "other chemicals which may impact....the river", what "other chemicals" are these?
6. When and how will the EPA verify and confirm the PCB hot spot locations and concentration data?

citizen phase I - pg two

7. How will EPA identify and asses historical PCB disposal areas? Has this been addressed in other studies? by DEC? Is it possible that these old disposal areas are a continuing source of PCBs to the river? Are there other current sources of PCBs going into the river? Two examples being the NYS dredge sites along the river and the status of possible PCBs along the Old Champlain Canal which runs through the Village of Schuylerville and the Saratoga National Historical Park lands?

The Community Interaction Plan itself was received quite enthusiastically by the Citizens, although the true effectiveness of the program can not be evaluated until the end of the HR PCB Reassessment.

In the past, governmental, scientific and industrial opinions on the problems of PCBs in the Hudson River have been so diverse and at odds with each other, that the Citizens own opinion has been based solely on faith. Who do you believe? Why do you believe them? Is there really a PCB problem? Are the risks of PCB contamination really so high? And most importantly, What are the solutions?

We see this EPA HR Reassessment as the chance to finally come to some concrete and mutually agreeable conclusions by the governmental, scientific and industrial sectors.

As taxpayers and consumers, the ones not only paying for this study, but perhaps for its solution, we ask that the committment to the Community Interaction Program continue to play a major role in the HR PCB Reassessment. To put it simply, if we're the ones already using the Hudson River, and the ones who want to use it even more, and the ones paying for it, then we must play a part in any decisions made about the river.

Judith Schmidt-Dean
Chairman - Citizen Liaison Committee

James Behan
Co-Chairman - Citizen Liaison Committee

Ennio Ruggi
Co-Chairman - Citizen Liaison Committee