

AGRICULTURAL LIAISON GROUP
PHASE 1 REPORT
March 12, 1991

Our group certainly appreciates the role we are to be allowed to take in this PCB reassessment. The proximity of agricultural lands and livestock to the Hudson River Valley and the nature of possible PCB contamination certainly makes this a very important issue to the agricultural community.

Because of the economic importance of agriculture to New York state, contamination of farm lands and livestock should be of great concern to all New Yorkers. The "Community Relations Plan" (pp.10 - 11) gave only a very small indication of New York's agricultural strength. To illustrate this, here are a few statistics from the NY Department of Agriculture. Because agriculture is basically a "raw materials" producer, it also supports an extensive food processing and marketing industry plus an agricultural services industry. THE FOOD AND AGRICULTURE INDUSTRY IS NEW YORK'S NO. 1 INDUSTRY. Receipts from sale of all New York farm products amounted to \$2.61 billion in 1988. In addition, New York is our nation's 3rd largest dairy producing state, the number one producer of both creamed and low-fat cottage cheese, second in production of Italian cheeses, and third in ice cream. New York is third in production of apples, second in production of tart cherries, third in grapes, fourth in pears and sixth in strawberries. New York is also second in production of sweet corn for fresh market, third in production of snap beans for processing, and fourth in production of cauliflower for fresh market. AGRICULTURE IN NEW YORK STATE IS IMPORTANT AND WORTH PRESERVING AND PROTECTING.

While we're on the "Community Relations Plan", I noticed the "Reassessment Area of Focus" (pp. 16-17 Figure 2) includes three counties: Rensselaer, Saratoga, and Washington. Back on pages 10 to 11, Washington County was apparently overlooked for mention of level of agriculture. According to NY Agricultural Statistics in 1988, agricultural sales were over \$73 million that year with an estimated economic impact of \$190 million to the county. Forty-five percent of Washington County land is in farms compared with a state average of less than 30% and the county ranks seventh in milk production among New York counties.

Our committee met on February 28th with 23 members attending (and several others calling me with regrets of not being able to attend). We concentrated our discussion on the Phase I Work Plan we had received.

After a review of our "Mission and Purpose", it was decided that further clarification was needed for: "to enable the organized and manageable dissemination of general project information." (p.3-3) (Specifically on how we are to accomplish this).

On committee structure, it was noted that the

Agricultural Liaison Group Chairman was the only representative of Agricultural interest on the Oversight Committee. Are these committee memberships finalized?

Also, with the possible stated cost of this total project approaching \$850 million (p.6 CRP), and the widespread and complicated environmental implications, we are concerned with the final decision on this project being left up to a single individual as was indicated to us at our February 14th meeting.

We then reviewed the project by TASKS as listed:

TASK 1: On Assembling Data, will ground water, flood plain, and soil data also be considered?

When developing a data base, will data from other sources, such as Monsanto or GE, be included?

Why are data from NYDEC and USGS of 1990 not available and does it make sense to continue into Phase 2 without them?

And under "D. Prepare inventories" (p.2-3), shouldn't agricultural contamination be added as leading to potential human exposure?

TASK 2: Will we know if the bioaccumulation rate has changed over time? Are the PCBs found more recently the same strength as they were years ago?(p. 2-5)

TASK 3: No comment.

TASK 4: It appears that more recent data even questions how toxic or carcinogenic PCBs are to humans. Will this issue be addressed in conjunction with the exposure assessment?

Under "A.", page 2-10, what "other chemicals" will be identified in the monitoring data?

Where do the "background" PCBs come from?

One of the major "exposure pathways" is "inhalation...in vapors and fugitive dust". Where does this come from?

On page 2-11, "sources of PCB toxicity information" include "open literature". Will this be named and made available?

TASK 5: Will the "comprehensive list of applicable or relevant and appropriate requirements" be made available?

TASK 6: No comment.

OTHER POINTS: It became clear during study of all these documents that a glossary of all the abbreviated terms and acronyms of organizations would be very useful.

We would like to have minutes of our meetings mailed to all members of our own liaison group. We would also like to see all committee members informed of all meetings, their time and place, including other liaison committees, Steering, and Oversight. It is understood that full participation at

some of these meetings is not possible and not necessary, but it would give everyone a current "feel" for how all aspects of this study are progressing.

Finally, it was indicated in the Community Relations Plan that the main area of focus was the upper Hudson area. It would seem only fair that the meeting locations, for Steering and Oversight as well, should remain in the upper Hudson or Albany area at least. This would certainly serve the majority of the liaison group members better, as this activity is not part of our normal work schedule.

Sincerely,

Tom Borden

Thomas A. Borden
Chairman
Agricultural Liaison Group