



**BOARD OF SUPERVISORS
WASHINGTON COUNTY**

Fort Edward, N.Y. 12828

Tel. (518) 747-7791

Fax (518) 747-0013

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Ann Rychlenski
Community Relations Coordinator
Office for External Programs
USEPA Region II
26 Federal Plaza
New York, New York 10278

Dear Ann,

I want to briefly summarize for you the concerns of the Government Liaison Group which were expressed at the recent Steering Committee meeting in Albany.

Generally our concern is that any information used in analysis or in developing models is recent and up-to-date data, and not some information resulting from 1986 or 1988 studies. On page 2-2 of the work plan for Phase I, Section A, last paragraph, it is indicated that certain 1990 data will not be available for Phase I, but will be evaluated in a later phase, if available. We would like to remove the words "if available", and ensure that this data will be evaluated, if not in Phase I, then for certain in a later phase.

Page 2-3, Section D, the third "bullet" indicates an inventory of "other chemicals which may impact on the current and future use of the river" will be prepared. If the purpose is to determine the problems caused to other chemicals from the corrective actions taken on PCB's then that inventory certainly is valid. But analysis and inventory of other chemicals independent of remedial impacts is not a stated purpose and the need for such appears unjustified.

On page 2-7, Section 2.3, second paragraph, we requested a comma following reassessment and adding, "and identify what additional data is needed to verify models".

On page 2-11, Section C, paragraph one, last sentence raises concern. The section addresses the development of Toxicity Assessments, yet states that Toxicity Values will be those currently accepted by EPA. It is recommended that the evaluation proposed in paragraph 2 should be reserved until such time as it is decided to pursue an approach using congener - and aroclor - specific toxicity data.

Beyond these comments I want to say that the concerns of the other Liaison Groups were of particular interest to us. We appreciate being a part to this reassessment process and look forward to our next meeting.

Respectfully,



Darryl L. Decker, Chairman
Board of Supervisors

DLD/cw

cc: Keith Griffin, Gov't. Liaison Group,
Co-Chairman
Paul F. Lilac, Gov't. Liaison Group,
Co-Chairman