

Hudson River Oversight Committee
Agricultural Liaison Group Report
January 21, 1992

Report to :
Constantine Sidamon-Eristoff
EPA Region II Administrator

Dear Administrator Eristoff;

I'm Tom Borden, chairman of the Agricultural Liaison Group. I am a dairy and fruit farmer from Washington County and Vice-President of Washington County Farm Bureau. The Agricultural Liaison Group has many interested and concerned members. We appreciate the opportunity that EPA is giving us to contribute to this reassessment process. It certainly is an excellent idea to get community involvement in this process. This is a huge project that presents important issues. This is reflected by the membership of our committee. Many are farmers who already work long and hard hours. Many already have other commitments such as school boards, town boards, volunteer fire departments, and county Farm Bureau boards. We don't take on participation in "another" project for lack of things to do.

Through letters, phone conversations, and a meeting held last Thursday, January 16, I have become aware of many concerns that our group members have.

The first of which would be our role as a Community Interaction Group. Ann and Karen have been very helpful with meeting arrangements and Al from TAMS does an excellent job of presenting the more technical information and answering questions, but, unfortunately, it has not always been clear what is expected of us and what impact our comments have. Although we are given time to ask questions and give comments, we do not always receive timely responses to questions not easily answered by people in attendance at these committee meetings. Even at this meeting, we are to comment about Phase 1 and Phase 2 when we have not yet seen responses to some of our previous Phase 1 comments nor have we seen a Phase 2 Work Plan. It really concerns our group that we don't really know if our comments make any difference before we're asked to comment again.

To illustrate: our group still has many of the same concerns that we had last summer, I hate to keep remaking these comments, but having not seen the Phase 1 responses, I don't want to see these issues dropped at this point:

1. This assessment is said to be directed at the Upper Hudson but PCBs in the Lower Hudson are continually considered in Phase 1. If concerns about the Lower Hudson are real and it is really an improvement in Lower Hudson contamination that is sought, then ALL OTHER SOURCES have to be identified and quantified, otherwise it would be impossible to determine how much, if any, benefit could be

derived from an extremely costly remediation of Upper Hudson sediments only.

2. Is the EPA reevaluating its PCB health risk standards to reflect newer knowledge of degree of chlorination and its impact on health risks? If PCBs do not pose the health threat that was once thought, then we should certainly determine this in time to incorporate these new standards with the risk assessment on this project. Why have we waited all of these years if we will not at this point use the most up to date knowledge that is available on PCB contamination.

3. The affects of dredging, both good and bad, need to be considered before this reassessment process proceeds much further.

Hopefully part of the purpose for tonight's meeting is to respond to some of these concerns. In the future I would like to suggest that all our liaison groups' comments addressed to this committee be responded to in writing and that this written response along with a copy of the liaison group's report be mailed to ALL liaison group members. I feel that this would demonstrate a serious consideration of all issues presented to all members of the liaison groups.

Questions that arise from our meetings should be answered in a "reasonable" amount of time - within a month anyway. If a full answer is not possible, than at least a progress report should be received within this period.

Further points on procedure:

1. I know we've been told that it has to be this way, but here goes again: Why do these Oversight Committee meetings have to be in Poughkeepsie? If community interaction is seriously desired, we should at least meet as far north as Albany - which is still south of the project area. Our participation doesn't pay us mileage or expenses. I suspect most other members do.

2. I think the role of the Steering Committee and timing of its meetings should be reevaluated.

We also have questions on how a final decision on this issue will be made. Specifically, what weight will be put on the various inputs, i.e. scientific, other government agency, public, and our liaison groups? How long will it take to make such a decision? What sort of final response do our liaison groups make? Do we take a vote among our members? Does the Oversight Committee make a final recommendation and does our group have a vote in this decision?

As local farmers we have long had many concerns related to landfilling (or encapsulation) in farming areas. Even a dredging project has at least a "perceived" contamination problem with farm livestock and crops in the area. Suppose Ben & Jerry's decides they don't want PCB contaminated milk. Whether the risk is real or not, the value of the areas' crops is affected. We don't need to make problems that aren't there. We don't want New York farmland to be continually attacked with landfill and encapsulation sites

simply because it lacks the population to prevent it. In fact the area surrounding Site 10 already seems to have its fair share of waste disposal sites.

As you know, NYDEC continues to favor dredging as solution to this PCB issue. Their extremely active role and blatant bias continues to alarm our committee members. Apparently EPA doesn't consider this an issue yet, but DEC's huge expenditures to this end have tainted this reassessment and cast a cloud of doubt over the integrity of this process. In fact the total cost of a dredging project makes all taxpayers want to make sure it is absolutely necessary. I know some will say this project would cost taxpayers nothing, GE will pay. We would submit that we will all pay ultimately and areas where GE plants reside may pay more.

I also represent New York Farm Bureau, with 23,000 members. At our recent Annual Meeting we reaffirmed our opposition to "dredging PCBs from the Hudson River.

In view of the 1984 ROD and the results so far of Phase 1, we really see no way that a dredging project can be justified. However, we do want this community interaction process to work and we do want to see this process continued so that these issues can fairly and responsibly be addressed. We thank you for this opportunity to express our views and hope you will consider them as seriously as we have offered them.

Sincerely,



Thomas A. Borden