

SCENIC HUDSON



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U.S. EPA, REGION II
EMER. & REM. RES. DIV.

1999 MAY 21 AM 11:44
Protecting the Valley's Environment, Town by Town
DIRECTOR'S OFFICE

Bill McCabe
FILE

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ADM

May 19, 1999

Jeanne Fox
Regional Administrator
U.S. Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

Dear Ms. Fox:

I attended The Joint Liaison Group Meeting on Tuesday, May 18 in Albany, at which the EPA Hudson River PCBs Reassessment team discussed the results of the Phase 2 Baseline Modeling Report. I wish to bring three issues to your attention.

1) Peer Review

The presentation of findings of the modeling report turned into a debate over whether or not the General Electric model should be peer reviewed along side the EPA model. We support EPA's position not to conduct a side-by side review of the two models. We believe it is an inappropriate use of the Superfund process and Superfund dollars to provide peer review for General Electric studies. GE has claimed that their model "has undergone independent review by a panel of renowned experts." If GE wants to continue such review of their model, than it should be by their own doing, not by EPA with taxpayer or Superfund dollars.

We also question the appropriateness of General Electric supplying their studies to members of the Peer Review committee and would urge the EPA to direct committee members to disregard such information.

2) Fish Concentration Targets

There was discussion of what standard would be an appropriate to determine the Rivers' recovery. While the FDA limit of 2ppm of PCBs applies to

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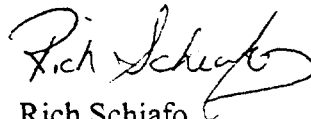
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commercially caught fish going to the market, a level of 0.1ppm is a more appropriate level in fish to protect public health and the environment, particularly fish-consuming wildlife. Many of the findings of the Baseline Modeling Report forecast when certain species of fish will reach the 2ppm level. Since this model is going to underlie the Human Health and the Ecological Risk Assessments it is unclear how levels lower than 2ppm will factor into your risk assessments. ✓

3) Lower River Meetings

As we have requested in the past, we again ask that some meetings be held in the lower river area, south of Albany, where there is community support for a Hudson River cleanup. We would be glad to assist in arranging such meetings ?

Sincerely,



Rich Schiafo
Environmental Associate

/sg

cc: Richard Caspe
Doug Tomchuk
Ann Rychlenski