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Mr. Douglas Tomchuk
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March 28, 1991

RE: Hudson River PCBs - Reassessment RI/FS

Dear Mr. Tomchuk:

This letter is in response to a letter from Kathleen Callahan requesting that I participate in the Scientific and Technical Committee which is being formed for this project. The letter asked that I review the Phase I Work Plan and provide comments. My comments fall in three areas and are expressed in general terms below. I expect that all comments will be further elaborated at the April 2 meeting.

The largest concern which I have about the Phase I Work Plan is that it appears that the focus of the RI/FS will be on the Upper Hudson. While it is true that the Lower Hudson encompasses a large geographic area which is subject to a number of potential PCB sources, it is also true that the Upper Hudson is one of (and probably the most significant of) these sources. I believe that the scope of the RI/FS should be expanded to include a more in depth assessment of the Lower Hudson, especially in the area of Ecological Risk Assessment (Task 4).

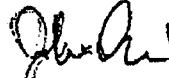
The second concern which I have about the Work Plan is that the DOT Dredge Spoils sites and the Remnant sites, which are located along the shores of the river, are not included in the RI/FS. These sites may be a continuing source of PCBs to the river through run off and groundwater. An evaluation of the input from these sources should be included in the scope of the RI/FS.

Finally, the Work Plan calls for the review and evaluation of available data and the development of a comprehensive database for the Upper and Lower Hudson River. The general quality of the analytical data already in existence will be evaluated, while a more detailed quality assurance evaluation may be performed during Phase II. I feel that these aspects of the project are

very important, since any decisions which are made will be ultimately based upon the data which is available.

I plan to attend the April 2, 1991 meeting of the Scientific and Technical Committee in Albany. I look forward to meeting you there.

Very truly yours,



John Davis
Environmental Scientist

cc: Richard Bopp - NYSDEC