

October 12, 1992

Ann Rychlenski
Community Relations Coordinator
U.S. EPA Region 2
26 Federal Plaza
Room 905
New York, N.Y. 10278

Dear Ann:

In reply to your letter of Oct. 1, 1992, I submit the following questions for the Scientific and Technical Committee for consideration at their upcoming meeting with the Liaison Groups:

1. To what extent have the specific algorithms and underlying assumptions to be used in using data from sediment samples to predict future PCB concentrations in fish been made available to the Committee and reviewed by the Committee? What conclusions and comments has the Committee reached on these algorithms and assumptions?
2. What is the Committee's position on the accuracy of the radioactive dating technique being used to assign calendar dates to the sediment slices made from the samples taken from the River? Does the Committee view this accuracy as sufficient to use the radioactive dating method?
3. What is the Committee's position on the adequacy of the sediment samples being taken to represent the inventory of PCBs in the entire River system sediments?
4. What is the Committee's position on the adequacy of EPA's procedures for relating PCB sediment concentrations to water concentrations to fish concentrations?
5. The approach by EPA is to use data from the past to predict future PCB concentrations in fish. It would seem that a good test of the prediction method would be to see how closely it predicts current PCB levels in fish but there are no plans to get current PCB levels in fish. Why hasn't the Committee pushed for getting current fish samples for this purpose?
6. What comments does the Committee have on the method EPA proposes to use for calculating human health risk from fish consumption?
7. What is the Committee's assessment of the uncertainty range of the final health risk assessment?

I very much desire to attend the joint meeting but will be away from Oct. 17 to Nov. 8 which means I must also miss the "field trip". If possible please schedule the joint meeting after Nov. 8.

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Please call me on 518 399-1690 if you have any questions regarding this letter. I look forward to meeting with you and the Scientific and Technical Committee in November.

Sincerely,



David D. Adams, P.E.
Member, Government Liaison Group
216 Stage Rd.
Charlton, N.Y. 12019

cc: Darryl Decker
George Hodgson, Saratoga Co. EMC

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Here are Tom Borden's questions on behalf of the Agricultural Liaison Group:

- 1) Will the combination of information previously obtained from Phase 1 and the data from Phase 2 be adequate to make an accurate judgement on remediation? If not, why not?
- 2) Does the Human Health Risk Assessment accurately and realistically reflect the actual risk the PCBs in the Hudson River pose to humans?
- 3) Does remediation of the upper river alone make any real difference to lower river health risk?

In addition, I will be bringing down to you the questions I have just received from Carl Deppe and Sharon Ruggi, as well as a question from Eleanor Brown. I have also spoken with Cara Lee and Bridget Barclay, and they will be faxing their questions in over the next day or two. The meeting announcement is going out today and tomorrow - it is on Thursday, 11/5/92 at 7:00 p.m. at the Holiday Inn Express at New Loudon Road in Latham, NY.