

WASH. CO CEASE REPORT ON WORK PLAN  
PREPARED FOR STEERING COMMITTEE MEETING 3/12/91

Review of the Phase I Work Plan leads to the overall conclusion that insufficient importance is given to the necessity of obtaining the most recent and timely data in this initial phase before proceeding with the subsequent phases of the reassessment.

Every effort must be made to obtain or prepare for gathering the most recent data available at the earliest possible stage of the reassessment so that the liason groups, committees, TAMS, and EPA may achieve the following:

1. Make Phase I as efficient as possible, perhaps saving time and unnecessary work in Phase II.
2. Improve the ability to establish accurate models, trends, and patterns.
3. Avoid establishing false premises in Phase I that would lead to subsequent false avenues of pursuit in Phase II.

The following specific areas stand out as requiring additional new data in Phase I:

1. Sediment Surveys: Existing sediment surveys i.e. 1984, 1978 are dated and probably obsolete due to high flow events in the interim. Plans must be made now for at the minimum some kind of preliminary survey to be conducted during the summer of 1991, especially in the area below the Thompson Island Dam, which has not been surveyed in more than 12 years. Since the technology is available, resurveys should be congener specific.
2. Water and fish level monitorings must be updated to include 1990 and 1991, i.e. USGS and DEC data, since past studies demonstrate dynamic relationships in these levels. The remnant remediation project may have a dramatic effect on these levels.
3. Both 1 and 2 above are imperative if any kind of meaningful model is to be developed to describe PCB movement below Ft. Edward and over the Troy Dam into the estuary, as planned for Phase I.
4. Since EPA is evaluating the possibility of establishing "Toxicity Equivalent Factors" for PCBs, provisions must be made early on to allow congener specific analysis to be applied to the risk assessment study.

The above measures to improve the accuracy of Phase I work should be easily obtainable since only the raw data, not necessarily completed studies, are required from agencies and parties (DEC, USGS, G.E., etc.). TAMS and EPA can then do the required modeling.

Carl Deppe & Sharon Rygi  
Pres. J.P.