

Washington County CEASE (Citizen Environmentalists Against Sludge Encapsulation) has a ten-year history of opposition to Hudson River dredging projects. Apart from the 1984 EPA ROD recommending remediation of the remnant deposits, the only governmental solutions to the river's PCB problem that have been proposed are the three DEC dredge projects. We have opposed all of these projects because:

1. There has been a failure to demonstrate that any dredging project would effectively improve environmental quality of the river and
2. The creation of a toxic waste dump required by a dredging project would be environmentally unsound.

The purpose of the current EPA reassessment is to reevaluate the 1984 ROD in view of the scientific advances since 1984 in both our knowledge of the characteristic of PCBs and their behavior in the river and treatment technologies. We have the following comments on the Phase I report:

1. The data show that the Thompson Island pool is not the major contributor to recent PCB loading. Rather the primary loading has been occurring above the pool, probably in the remnant deposit area. Now that the remnant deposits have been remediated, it is imperative to obtain the data on the effects of the remnant remediation as early as possible in Phase II.

2. The report cites sources of PCB in the New York City metropolitan area to be more significant contributors to PCB loading in the lower river than loading from the upper river. Furthermore lower river PCBs are not the same congeners that are found in the upper river. These lower river sources must be identified and quantified in Phase II.

3. The report contains no evidence to demonstrate that a massive dredge project would significantly accelerate the improvement, which is naturally occurring, in the river, as compared to the no-action alternative. Points 1 and 2 above also point to the futility of a dredging project.

4. Although the report mentions dredging as an alternative it fails to address any of the adverse environmental impacts associated with dredging, including

- a. Massive destruction of the eco-system on the river bottom.
- b. Destruction of wetlands in shoreline depositional areas.
- c. Resuspension of sediments.
- d. Halting the naturally occurring biodegradation process.
- e. Creation of a toxic waste dump in contravention of EPA's stated policy against land burial of toxic materials.

These adverse impacts must be addressed in Phase II.

5. The preliminary health risk assessment is based on unfounded assumptions including the numbers of fishermen, amounts of fish ingested and discounting of the fishing ban. However, the most serious error is the assumption that PCBs in the upper river are aroclor 1260 when we know that they are not. To mislead the public in this way is not conservative science, but rather false science, That can also be described as political scare tactics. Before proceeding with any further health risk assessment the project group responsible for this reassessment, must seek some modification of the health risk calculation from the Regional Administrator and/or EPA Administrator Reilly so that the process will be based on reality instead of science fiction. To do otherwise when all the scientific evidence points to varying toxicity among PCB congeners, would continue a scientific travesty that undermines the credibility of the whole reassessment process.